

FRANCHISE TAX BOARD

1025 P STREET

SACRAMENTO, CALIFORNIA 95814

May 26, 1969

Asian Art Foundation of San Francisco
McCutchen, Doyle, Brown & Enersen
601 California Street
San Francisco, CA 94108

Re: Exemption from franchise tax

Gentlemen:

It is the opinion of this office, based upon the evidence presented, that you are exempt from State franchise tax under the provisions of Section 23701d of the Revenue and Taxation Code, as it is shown that you are organized and operated exclusively as a charitable and educational organization.

Accordingly, you will not be required to file franchise tax returns unless you change the character of your organization, the purposes for which you were organized, or your method of operation. Any such changes should be reported immediately to this office in order that their effect upon your exempt status may be determined.

If in any year your gross income exceeds \$25,000, you are required to file an information return on Form 199 on or before the 15th day of the 5th month following the close of your fiscal year. These forms will be mailed to you if you provide us with your current postal address.

If you have income from an unrelated trade or business that is taxable under the provisions of Section 23731 of the Revenue and Taxation Code, you must file a return on Form 109 on or before the 15th day of the 3rd month following the close of your fiscal year. Copies of this form may be obtained from this office or any of its branches.

Contributions made to you are deductible by the donors in arriving at their taxable net income in the manner and to the extent provided by Sections 17214, 17215, 17216, and 24357 of the Revenue and Taxation Code.

If the organization is not yet incorporated or has not yet qualified to do business in California, this approval will expire unless incorporation or qualification is completed within 30 days.

Very truly yours,

James C. Stewart
James C. Stewart

Tax Counsel

JCS:sma

cc: Secretary of State

(D) Registrar of Charitable Trusts

FTB 4212 (4-68)



Internal Revenue Service
Washington, DC 20224

Date:

In reply refer to

JULY 17, 1972

ASIAN ART FOUNDATION OF SAN
FRANCISCO
1 MARITIME PLAZA GOLDEN GATEWAY CIR
SAN FRANCISCO, CAL 94119

Gentlemen:

Based on the information you recently submitted, we have classified your organization as one that is not a private foundation as defined in section 509(a) of the Internal Revenue Code because you are an organization described in the following Code Section:

- Sec. 509(a)(1)
- Sec. 509(a)(2)
- Sec. 509(a)(3)
- Sec. 509(a)(4)

This classification is based on the assumption that your operations will continue as stated in your notification. All changes in your purposes, character, or method of operation must be reported to your District Director so he can consider their effect on your status.

Sincerely yours,

J. J. [Signature]
Chief, Rulings Section
Exempt Organizations Branch

Address any reply to: P.O. Box 36040 San Francisco, Calif. 94102

US Treasury Department

District Director
Internal Revenue Service

Date: JUL 31 1969

In reply refer to:
L-178, Code 414

SF:EO:69-635



▶ Asian Art Foundation of
San Francisco
One Maritime Plaza
Golden Gateway Center, 24th Floor
San Francisco, CA 94119

Purpose: Charitable and educational
Address Inquiries and File Returns with District
Director of Internal Revenue: San Francisco
Form 990-A Required: Yes No
Accounting Period Ending: December 31

Gentlemen:

On the basis of your stated purposes and the understanding that your operations will continue as evidenced to date or will conform to those proposed in your ruling application, we have concluded that you are exempt from Federal income tax as an organization described in section 501(c)(3) of the Internal Revenue Code. Any changes in operation from those described, or in your character or purposes, must be reported immediately to your District Director for consideration of their effect upon your exempt status. You must also report any change in your name or address.

You are not required to file Federal income tax returns so long as you retain an exempt status, unless you are subject to the tax on unrelated business income imposed by section 511 of the Code, in which event you are required to file Form 990-T. Our determination as to your liability for filing the annual information return, Form 990-A, is set forth above. That return, if required, must be filed on or before the 15th day of the fifth month after the close of your annual accounting period indicated above.

Contributions made to you are deductible by donors as provided in section 170 of the Code. Bequests, legacies, devises, transfers or gifts to or for your use are deductible for Federal estate and gift tax purposes under the provisions of section 2055, 2106 and 2522 of the Code.

You are not liable for the taxes imposed under the Federal Insurance Contributions Act (social security taxes) unless you file a waiver of exemption certificate as provided in such act. You are not liable for the tax imposed under the Federal Unemployment Tax Act. Inquiries about the waiver of exemption certificate for social security taxes should be addressed to this office, as should any questions concerning excise, employment or other Federal taxes.

This is a determination letter.

Very truly yours,

Joseph M. Cullen
Joseph M. Cullen
District Director *RCY*

**ENDORSED
FILED**

In the office of the Secretary of State
of the State of California

SEP 17 1982

MARCH FONG EU, Secretary of State
By JAMES E. HARRIS
Deputy

**CERTIFICATE OF AMENDMENT
OF
ARTICLES OF INCORPORATION**

GEORGE F. JEWETT, JR. and HOPE TARPEY BRADY certify that:

1. They are the president and secretary, respectively, of ASIAN ART FOUNDATION OF SAN FRANCISCO, a California non-profit corporation.

2. At a meeting of the Board of Trustees of the corporation, duly held at the Asian Art Museum, Golden Gate Park, in the City and County of San Francisco, State of California, on September 14, 1982, the following resolution was adopted:

"RESOLVED, that Article FIRST of the Articles of Incorporation is amended to read as follows:
'The name of this corporation is ASIAN ART MUSEUM FOUNDATION OF SAN FRANCISCO.'"

3. The Board of Trustees of the corporation constitutes all of the members of the corporation, the Trustees are authorized by the Articles of Incorporation of the corporation to exercise all of the powers of the members thereof, and each Trustee is entitled to one vote.

4. The number of Trustee/members who voted affirmatively for the adoption of the resolution is 11, and the number of Trustee/members constituting a quorum is 8.

George F. Jewett, Jr.
George F. Jewett, Jr., President

Hope Tarpey Brady
Hope Tarpey Brady, Secretary

The undersigned declare under penalty of perjury that the matters set forth in the foregoing certificate are true of their own knowledge. Executed at San Francisco, California on September 14, 1982.

George F. Jewett, Jr.
George F. Jewett, Jr.

Hope Tarpey Brady
Hope Tarpey Brady

District Director

Date: July 07, 1983

Date of Exemption: July 31, 1969

Internal Revenue Code Section: 501(c)(3)

Refer Reply to: RM: CSB: P-III

▷ Asian Art Museum Foundation of San
Francisco
60 Corte Real #6
Greenbrae, CA 94904

Gentlemen:

Thank you for submitting the information shown below. We have made it a part of your file.

The changes indicated do not adversely affect your exempt status and the exemption letter issued to you continues in effect.

Please let us know about any future change in the character, purpose, method of operation, name or address of your organization. This is a requirement for retaining your exempt status.

Thank you for your cooperation.

Sincerely yours,

Michael Sami

District Director

Item Changed

From

To

NAME

Asian Art Foundation of
San Francisco

Asian Art Museum Foundation of
San Francisco