July 12, 1991

Ms. Barbara Bohmann, Treasurer-Manager Auburn University Federal Credit Union Donahue & Thach Auburn University Alabama 36849-5326

Re: Tax-exempt Status of Federal Credit Unions (Your June 28, 1991 Letter)

Dear Ms. Bohmann:

You asked whether federally chartered credit unions qualify as Section 501(c) organizations under the Internal Revenue Code. Please be advised that federal credit unions are ex- empt from taxation pursuant to I.R.C. Section 501(c)(1), 26 U.S.C. $\sim 501(c)(1)$.

Sincerely,

James J. Engel Deputy General Counsel

GC/MRS:sg SSIC 3000 91-0710