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UBCHEA ARCHIVES
COLLEGE FILES
RG 11

Nanking
Corres.
United Evangelical Church 1922
United States Dept. of State 1928-1937
United States Treasury Dept. 1935

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United Evangelical church

02 15

UNIVERSITY OF
NANKING
TRUSTEES

150 Fifth Avenue,
January 4, 1922.

Rev. B.H. Niebel, D.D.
Harrisburg, Pa.

My dear Dr. Niebel:-

Evangelical Association

The services which the Department of Missionary Training of the University of Nanking, more commonly known as the "Nanking Language School," has been rendering to more than twenty-eight of the missionary societies in giving indispensable instruction and assistance to their missionaries in their first year of service are well known. In the last ten years more than 720 have received training, the enrolment at the beginning of the current year being 133.

It has been the fact, however, that during this entire period there has been no charge for rent, the fees paid covering only board and tuition. Furthermore, the housing of the students has been hitherto almost entirely in the homes which the missionary community have generously opened to the students. (One dormitory now provides for twenty-two students.) Conditions have now become so congested that it is imperative that these students no longer be housed in missionary homes in such large numbers. Your attention is directed to the attached statement by Mr. C.S. Keen, Director of the Language School, on this matter, the gravity of which has long been recognized by missionaries and Board Secretaries, cognizant of the facts.

It has become distressingly urgent that more dormitories be erected and that increased facilities for the school be provided. The University has already set apart the site now used by the school. Plans are ready for two additional dormitories which, with the one now in use (a gift to the University) will provide for 100 students. These dormitories will cost approximately \$120,000 Local Currency.

The Trustees of the University believe that the boards whose missionaries are trained in the school will recognize the propriety of a request for assistance in building these dormitories. The school is a service school for the boards only. It is the care of their missionaries that is at stake. For missionaries in stations it is the custom of the board to provide accommodations or rent. Surely the same should be done for these new missionaries.

The Trustees accordingly desire to suggest that your board provide \$3000 Local Currency for the erection of these dormitories. This sum is calculated as follows: The annual average number of all students for the last five years (for all the boards having an average of one or more students a year) is seventy-two. The average number of students from your board in the last five years is 1 and 8/10. Accordingly the Trustees ask you to provide 1 and 8/10 seventy-seconds of \$120,000 or \$3000.

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This sum should be paid within a period of eighteen months in order that the erection of the buildings may proceed without delay. Payments may be made in three instalments, within two or possibly three of your fiscal years, but within a calendar period of eighteen months.

The boards which thus contribute to the building fund will have first call upon dormitory facilities.

In order to accumulate further sums for the administration and recitation building, only less necessary than the dormitories, the Trustees have voted to charge (1) a fixed rent for each student and (2) a property charge for each student. These charges will operate as follows:

- (1) Rent of \$100 Local Currency for the academic residential year to be paid by all students to the school. Where such students are resident in missionary homes, the School will transfer to the mission providing housing the exact sum of the rent. Rents from students in School Dormitories will be accumulated in a building fund. There will be no remission of this charge.
- (2) A Property Fund Charge of \$200 Local Currency a year will be made to each board for each student it has in the School. When a board has put up capital for the buildings, its annual Property Fund Charges will be reduced by ten per cent of the capital paid in by the beginning of each term. Thus a board having in one year ten students will be charged \$2000 Local Currency. If it shall have paid in \$10,000 Local Currency for the building the charge will be reduced by \$1000. The receipts from these Property Fund Charges will be accumulated in a fund for the building needed.

It should be noted further that the action of the Trustees provides for the elimination of the charges for property fund as soon as the funds for completing the buildings needed are in hand.

The effect of these actions is simply to condense the payments of rent, which would otherwise be spread over a very long period into a few years in order that your students may now have the use of proper facilities at the earliest possible moment. A financial statement of the project is attached herewith showing its working in detail.

For purposes of explanation of this matter and the answering of inquiries a conference upon it will be called during the Foreign Missions Conference at Atlantic City. I trust, however, that, if possible, you will present the matter to your board and will be able to bring to Atlantic City a favorable reply to the suggestion of the Trustees looking to the immediate building of dormitories.

Cordially yours,

EMN:RB

Secretary

✓
Home and Foreign Missionary Society of the United Evangelical Church
AND
Board of Church Extension of the United Evangelical Church

Rooms 207 and 208 Evangelical Building

REV. B. H. NIEBEL, D.D.
CORRESPONDING SECRETARY

8
Harrisburg, Pa., Jan. 7, 1922.

Board of Trustees, University of Nanking.
150 Fifth Avenue,
New York City.

UNIVERSITY OF
NANKING
TRUSTEES

Attention: Eric M. North.

TRANSFER

Dear Mr. North:

I have your favor of January fourth in which you give a very clear detailed statement of a plan for ~~building~~ ^{erection of} missionary buildings and equipment for the Nanking Language School. I was of course aware that a matter of this kind would be brought to the attention of the various Boards, for I had heard it presented by Mr. Keen at a meeting of the Committee of Reference and Counsel. The only thing that I can do in the matter, is to hold it over for presentation at the Annual meeting of our Board of Missions. This is the only body in our church that can take definite action in a matter of this kind. I shall present it to our Board for consideration.

Thanking you again for your letter and statement,

I am,

Sincerely yours,

B. H. Niebel

*Our Board meets in the
month of October,*

SEARCHED	INDEXED
SERIALIZED	FILED
1/9/22	
BY BHN/MS.	
BY	FILED
DATE	DATE

0218

Home and Foreign Missionary Society of the United Evangelical Church
AND
Board of Church Extension of the United Evangelical Church
Rooms 207 and 208 Evangelical Building

TRANSFER

REV. B. H. NIEBEL, D.D.
CORRESPONDING SECRETARY

Harrisburg, Pa.,

May 11, 1922



Nanking

Mr. Eric M. North, Sec'y.
University of Nanking
Nanking, China

Dear Mr. North:

I have your favor of May 9th addressed to the Mission Boards sending students to the Nanking Language School and which calls our attention to a rental charge and a property fund charge for missionaries.

Replying to the same will say that I shall bring the matter before our Executive Committee at its first meeting, and I have no doubt that proper attention will be given to it.

Thanking you for this notice and with every good wish,
I am

Sincerely yours,

B. H. Niebel

RECEIVED BY **BHN:MV**
ERIC M, NORTH ()
(DATE)
6/30/22
TO REFERRED DATE
BY ANSWERED DATE
BY PASSED TO FILE DATE
BY FILED DATE

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U.S. Dept of State
1928, 1937

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INDEXED

Nanking

TRANSFER

September 17, 1929

us

Dr. Stanley K. Hornbeck,
Department of State,
Washington, D.C.

My dear Dr. Hornbeck,

There has recently come up in connection with the University of Nanking a problem on which I should deeply appreciate your informal assistance.

The Board of Directors in Nanking and the Board of Trustees here in New York are at the present time giving serious study to the question whether or not any statement of losses at the University at the time of the incident of March 24, 1927, and during the subsequent months, should be filed with the State Department at Washington, and whether, if such a statement is filed, it should be made the basis for claims for the repayment of such losses. As far as we can judge, the feeling of the Board of Directors on the field seems to be that the repayment of losses through diplomatic channels might have an unfavorable effect on the work which would more than offset the recompense received. The Board of Trustees have not as yet taken formal action.

There are two specific questions on which I should very much like to have your advice:

1. Has any date been set by which statements of losses and claims for repayment must be filed with the State Department if such statements and claims are to receive recognition?
2. Would the filing of a statement of losses in any way commit an institution to accept payment for such losses later on, or would such statement be considered by the Department as informational only until and unless it were followed later by a formal request for such repayment?

Your advice on these two points will greatly assist the Board of Trustees in formulating its policy, and I will greatly appreciate whatever assistance you may be able to give.

Very sincerely yours,

BAG-H

Secretary

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0221



W
DEPARTMENT OF STATE
WASHINGTON

Nanking

In reply refer to
FE

October 1, 1928

INDEXED

TRANSFER

ack. 10/17/28.

Mr. B. A. Garside,
150 Fifth Avenue,
New York City.

Sir:

The Department has received your letter of September 17, 1928, regarding the subject of reparations for the University of Nanking for losses suffered by it at the time of the incident of March 24, 1927.

In reply to the two specific questions asked in your letter, you are informed that the meetings of the Sino-American Joint Commission began on August 27, 1928, and it is hoped that the work of the Commission will be concluded by November 27, 1928. Requests for the payment of reparations will be received by this Department or by the American consular offices at Nanking or Shanghai at any time before the Commission concludes its discussions, but if such requests are presented to the

Department

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Department for transmission they should reach the Department before October 20, in order to allow time for consideration and mailing. Delayed presentation obviously will impede the work of the Commission, and may possibly result in excluding requests from consideration by the Joint Commission.

Statements of losses filed with the Department or its representatives in China by American citizens or concerns in connection with the incident of March 24, 1927, will not be presented to the Joint Commission against the expressed wishes of the claimants, and the Department and its officials in China will, when so advised, treat the statements as having been submitted solely for informational purposes. The decision arrived at in this instance is without prejudice to the general right reserved by the Department to protest to the Chinese authorities against the destruction of American property, when this occurs, and to include in such protests reservation of its rights to file claims therefor.

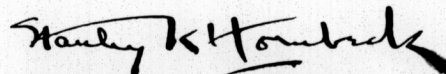
Itemized statements of losses filed either with the Department or with a consular office should be sworn to in quadruplicate. The affidavit should include a statement regarding the manner in which the losses were sustained, a reference to the American citizenship of
the person

the person who suffered the damage and a statement of how it was acquired, or, in the case of an organization, a reference to its American nationality and to its manner of incorporation, the time and manner in which the property for which claim is made was acquired, the exact location of the property when it was lost, the original cost of the property in American dollars, its estimated sale value at the time of loss in American dollars, and its estimated replacement value in American dollars. Such documentary evidence as may be available should be submitted for the support of any statements made in the affidavit. It is important that separate itemized lists of losses submitted in connection with a sworn statement of claim should be in quadruplicate and that each copy of the list be sworn to.

I am, Sir,

Your obedient servant,

For the Secretary of State:



Stanley K. Hornbeck,
Chief,
Division of Far Eastern Affairs.

the person who suffered the damage and a statement of how it was acquired, or, in the case of an organization, a reference to its American nationality and to its manner of incorporation, the time and manner in which the property for which claim is made was acquired, the exact location of the property when it was lost, the original cost of the property in American dollars, its estimated sale value at the time of loss in American dollars, and its estimated replacement value in American dollars. Such documentary evidence as may be available should be submitted for the support of any statements made in the affidavit. It is important that separate itemized lists of losses submitted in connection with a group statement of claim should be in quadruplicate and that each copy of the list be sworn to.

I am, Sir,

Your obedient servant,

Stanley K. Harbeck
 Stanley K. Harbeck
 Chief
 Division of Far Eastern Affairs

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 UNIVERSITY
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October 8, 1928

TRANSFER

Dr. Stanley K. Hornbeck,
Department of State,
Washington, D.C.

My dear Dr. Hornbeck:

We are grateful for your letter of October 1st - reference
FE - in which you give us valuable information in regard to the sub-
ject of reparations for the University of Nanking losses. We will
bring this information to the attention of the Executive Committee
of the Board of Trustees of the University of Nanking at an early
date.

Faithfully yours,

Secretary

BAG-H

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0226

NANKING

October 7, 1936

Dr. Stanley K. Hornbeck
Chief of Division of Far Eastern Affairs
Department of State
Washington, D. C.

My dear Dr. Hornbeck:

At a meeting of the Board of Founders of the University of Nanking held on September 24th, 1936, very thorough consideration was given to the important questions involved in the latest request of the Chinese Governmental authorities for the registration of the real estate belonging to and occupied by the University of Nanking. As the outcome of its deliberations the Board of Founders adopted the following actions:-

"VOTED that the Board of Founders of the University of Nanking authorize the Board of Directors of the University to register the property, including both land and buildings, of the University of Nanking with the Chinese Government in the name of the Board of Directors, with the understanding that the Board of Directors will give the Board of Founders, representing the original donors, formal assurance of their acceptance of the trust to carry on the University in accordance with the purpose for which it was founded."

The Board of Founders instructed me to transmit a copy of this action to the United States Department of State in Washington and to the American Embassy in Peiping.

Respectfully yours,

HAG:MP

Secretary

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DEPARTMENT OF STATE
WASHINGTON

In reply refer to
FE 393.1164/176

October 15, 1936

N.S.

F

My dear Mr. Garside:

The receipt is acknowledged of your letter of October 7, 1936, in regard to the action taken at a meeting of the Board of Founders of the University of Nanking, held September 24, 1936, on the question of the registration with the Chinese Government of the real estate belonging to and occupied by the University of Nanking.

Your courtesy in informing the Department of the action taken in this matter is appreciated.

Sincerely yours,

Stanley K. Hornbeck,
Chief,
Division of Far Eastern Affairs.

Mr. B. A. Garside,

Secretary and Assistant Treasurer,

Board of Founders of the University
of Nanking,

150 Fifth Avenue,

New York, New York.

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0228



ack. 10/29/28.

TRANSFER

October 19, 1928

Dr. Stanley K. Hornbeck,
Department of State,
Washington, D.C.

My dear Dr. Hornbeck:

In continuance of our correspondence on the matters discussed in my letter of September 17, 1928, and your reply of October 1, 1928 (Reference FE), I now have the honor to report that at a meeting held on October 17, 1928, the Executive Committee of the Board of Trustees of the University of Nanking took the action shown in the appended document.

I am also attaching for your information a copy of the letter we are today addressing to the Board of Directors in Nanking.

Thanking you for the courteous interest you have given to these matters, I am

Very truly yours,

BAG-H

Secretary

Enc.

CC: Hon. Alfred Sao-ke Sse,

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INDEXED

DEPARTMENT OF STATE
WASHINGTON

Nanking

October 29, 1928

In reply refer to
FE 493.11 University of Nanking/4

TRANSFER

Mr. B. A. Garside,
Secretary, University of Nanking,
150 Fifth Avenue,
New York, New York.

Sir:

The Department acknowledges the receipt of your letter of October 19, 1928, transmitting an extract from the Minutes of the Executive Committee, Board of Trustees of the University of Nanking, dated October 17, 1928.

The Department has learned with interest of the action taken in regard to reparation for losses sustained at the time of the Nanking incident of March 24, 1927. It is noted that you are writing to the Board of Directors in Nanking in this connection. It does not appear that you have telegraphed, however, and in order to obviate the possibility of any confusion in the matter the Department has telegraphed to the American members of the Joint Commission that portion of the Resolution beginning with

the

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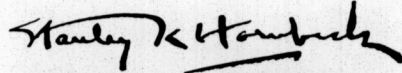
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the words "that no statement of losses or claims" and ending with "Joint Commission".

I am, Sir,

Your obedient servant,

For the Secretary of State:



Stanley K. Hornbeck,
Chief,
Division of Far Eastern Affairs.

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the words "that no statement of losses or claims" and
ending with "Joint Commission".

I am, Sir,

Your obedient servant,

For the Secretary of State:

Stanley K. Hornbeck
Stanley K. Hornbeck,
Chief,
Division of Far Eastern Affairs.

RECEIVED
UNIVERSITIES
OCT 30 1928
JOINT OFFICE

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0232

ADDRESS OFFICIAL COMMUNICATIONS TO
THE SECRETARY OF STATE
WASHINGTON, D. C.



DEPARTMENT OF STATE ✓
WASHINGTON

In reply refer to
FA 393.1115/2185

December 17, 1937

Mr. W. Reginald Wheeler,
University of Nanking,
150 Fifth Avenue,
New York, New York.

Sir:

Receipt is acknowledged of your letter of December 18, 1937, requesting information regarding the safety of members of the faculty of the Nanking University and the University Hospital staff at Nanking.

A telegram from the American Embassy at Nanking dated December 9 reported that eighteen American citizens were planning to remain in Nanking indefinitely in connection with hospital, safety zone and newspaper work. Among the eighteen Americans listed were M. Searle Bates, 3 Ping Tsang Hsiang; C. H. Riggs, 23 Hankow Road; Lewis S. C. Smythe, 3 Ping Tsang Hsiang; Miss Grace Bauer, University Hospital; Miss Iva Hynds, University Hospital; Dr. S. C. Trimmer, University Hospital; and Dr. Robert Wilson, University Hospital.

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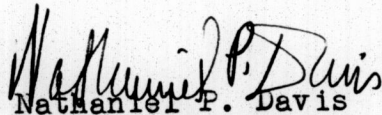
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A telegram from the Embassy at Nanking November 23 reported that Dr. Richard F. Brady was remaining at Nanking. A telegram has been sent making inquiry concerning his present whereabouts and welfare.

With reference to the other persons mentioned in your letter you are informed that a telegram from the American Consul General at Hankow dated December 13 reported Oliver Johnson Caldwell well in Hankow. A telegram from the Embassy at Nanking dated December 2 reported Peter J. Bannon left Nanking, and a telegram dated December 3 from the Embassy reported that J. Claude Thomson left Nanking for upriver.

Very truly yours,

For the Secretary of State:


Nathaniel P. Davis
Chief, Division of
Foreign Service Administration

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U.S. Treasury Dept
1935

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0235

Nanking

January 26, 1935

-K-98/35

24
Commissioner of Internal Revenue
Treasury Department
Washington, D.C.

Re: IT:E:RR:MM

Dear Sir:

This is an application for exemption from federal income taxation for the University of Nanking located in Nanking, China, with offices at 150 Fifth Avenue, New York City.

In this connection I am enclosing the following:-

1. General statement covering the activities of the University
2. Copy of certificate of incorporation
3. Copy of By-laws
4. Annual report of the Treasurer as of June 30, 1934

Nanking University's fiscal year is from July 1st to June 30th, and therefore I am enclosing a report covering this period. This has been audited by certified public accountants, Messrs. Chambellan, Berger & Welti.

The treasurer's report includes a list of securities held at the close of the year, an analysis of the budget, and the closing trial balance sheet. The report itself reviews the financial activities of the year in the various sections of our bookkeeping.

I trust this information will be ample for your purpose, but we will be glad to furnish any other additional data which might be required.

Very truly yours,

CAB:RC
Enc.

*See
"From Ref."*

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0236

1934 RETURN

OF
CAPITAL-STOCK TAX
 For year ending June 30, 1934

TRIPPLICATE
 TO BE RETAINED BY TAXPAYER

(Collection district)
 Assessment List, Form 23A

(Month) _____ (Year) _____

(Page) _____ (Line) _____

DOMESTIC CORPORATIONS

(Sec. 701, Revenue Act of 1934, 73d Congress, Public, No. 216)

This return must be filed with the Collector of Internal Revenue for your district on or before July 31, 1934, and the tax must be paid on or before that date.

To be stamped by collector, showing district and date received

Examined by: _____

1. Name University of Banking
(Print name of corporation, joint-stock company, or association)
2. Address 150 Fifth Avenue, New York, N.Y.
(The address must be that of the principal place of business. Give "Street and number", "City or town", and "State")
3. Name of parent company, if any none (District filed _____)
4. Name of subsidiary, if any none No. shares held _____ (District filed _____)
(Or attach list and state number of shares held; also districts where filed)
5. Nature of business in detail Christian educational work in Banking, China
6. Incorporated or organized in State of New York Month April 19 Year 1911

DECLARATION OF THE VALUE OF THE CAPITAL STOCK

IMPORTANT.—Before declaring a value for the capital stock, carefully read the instructions below, as a value once declared cannot later be amended.

If you file your income tax return on a calendar year basis, or would do so if subject to income tax, declare in the space below a value for the entire capital stock of your corporation as of December 31, 1933, which you are willing to have accepted in this and subsequent years, as a basis, subject to statutory adjustments, on which to pay capital-stock tax and excess-profits tax.

If you file your income-tax return on a fiscal year basis, or would do so if subject to income tax, declare the value as of the close of such fiscal year.

If your corporation was organized during the year July 1, 1933, to June 30, 1934, both dates inclusive, and if neither the first calendar year nor the first fiscal year for income-tax purposes has ended during the year July 1, 1933, to June 30, 1934, both dates inclusive, declare the value as of the date of organization.

If your corporation is without a capital stock represented by shares, declare a value for the net worth of the corporation.

(See INSTRUCTION No. 3 for additional information)

7. * VALUE OF ENTIRE CAPITAL STOCK \$ none

* A specific and unqualified value must be shown in this space. If the capital stock is of no value insert the word "None."

EXEMPTIONS. (See INSTRUCTION No. 4)

8. Is exemption from the tax claimed? Answer Yes or No (Yes).
9. If exemption is claimed, check the block which shows basis of claim and furnish the information required on page 2.
 - Section 101, Revenue Act of 1934.
 - Insurance company.
 - Not doing business.

COMPUTATION OF TAX	For use of Taxpayer				For use of Department			
10. Amount shown in item 7.....	\$				\$			
11. Tax at rate of \$1 for each full \$1,000 in item 10 (omit cents).....								
12. Penalty of 25 percent for delinquency in filing return.....								
13. Interest.....								
14. Total tax, penalty, and interest.....								

AFFIDAVIT

We, the undersigned, president (or vice president, or other principal officer) and treasurer (assistant treasurer or chief accounting officer) of the corporation for which this return is made, being severally duly sworn, each for himself deposes and says that this return, including the accompanying schedules and statements, has been examined by him and is, to the best of his knowledge and belief, a true and complete return, made in good faith, for the taxable year stated, pursuant to the Revenue Act of 1934 and the Regulations issued thereunder.

Sworn to and subscribed before me this _____ day of _____, 1934.

NOTARIAL SEAL

(Signature of officer administering oath)

(Title)

CORPORATE SEAL

(President or other principal officer)

(State title)

(Treasurer, Assistant Treasurer, or chief accounting officer)

(State title)

(See INSTRUCTION No. 7)

0237

2273845

INSTRUCTIONS

1. **Nature of the tax.**—The capital-stock tax imposed by section 701 of the Revenue Act of 1934 is an excise tax imposed on corporations with respect to carrying on or doing business for any part of each year ending June 30. The tax due and payable during July 1934, is with respect to carrying on or doing business for any part of the period between the date of the enactment of the act, namely, May 10, 1934, and June 30, 1934, both dates inclusive, and is based on the value declared by the corporation for its capital stock.

2. **Filing return.**—Every domestic corporation must file a return for the year ended June 30, 1934, in order that the Commissioner may determine its liability to the tax. The return shall be filed in duplicate with the collector for the district in which is located its principal place of business. If a corporation has no principal place of business in the United States, it will file with the Collector at Baltimore, Md. The return should be carefully prepared and should be complete in every respect.

3. **Declared value.**—The greatest care should be exercised in making the original or initial declaration of value under section 701 of the Revenue Act of 1934 for three reasons: (1) The right to declare a value for the capital stock does not recur, (2) once the value has been declared it may not be changed or amended either by the taxpayer or the Commissioner, and (3) the value declared in the first return filed by the corporation adjusted in accordance with section 701 (f) of title V will form the basis for the computation of the capital-stock tax payable for subsequent years. The term "first return" used in subsection (f) of section 701 means the first capital-stock tax return filed by the corporation in point of time for the taxable year rather than its choice of a number of returns filed by it for the first year in which the company is subject to the capital-stock tax imposed by the Revenue Act of 1934.

The act prohibits an amendment or change in the value declared for the capital stock on the first return filed for the first year for which it is liable for the tax, and restricts adjustments for subsequent taxable years to those specifically enumerated in section 701 (f) of the act. In making its original or initial declaration of value in its return under this act the corporation is in no manner bound by any prior declaration of value that may have been made under the provisions of section 215 of the National Industrial Recovery Act. Authorized but unissued capital stock is not a relevant factor and should not be included.

If a corporation fails to make a return (which includes the declaration of value) the deputy collector, collector, or Commissioner may make the return.

4. **Exemptions.**—Three classes of corporations or organizations are exempt from the tax: (1) Corporations specifically exempt under provisions of section 101 of the Revenue Act of 1934, (2) insurance companies taxed under the provisions of section 201, section 204, or section 207 of the Revenue Act of 1934, and (3) corporations not carrying on or doing business. If exemption is claimed under section 101, information as indicated under (A) on page 2 should be prepared and attached to the return. An insurance company will indicate under (B) on page 2 the section of the act under which it makes returns of income tax. If it is claimed that the corporation is not doing business, the information indicated under (C) on page 2 should be prepared in affidavit form and attached to the return. In preparing this information, it should be borne in mind that matters perfectly obvious to the officials of the corporation who have knowledge of all the corporate affairs may not be obvious to the examiner unless all pertinent facts are disclosed. If information other than that indicated in (C) on page 2 appears pertinent and will clarify the situation, such information should be included and made a part of the affidavit. If exemption is claimed and such claim is subsequently rejected by the Commissioner, interest accrues at the rate of 1 percent a month from the date the tax was due (July 31, 1934), to the date of payment and not from date of rejection to date of payment.

5. **Adjustments.**—The adjustments provided under subsection (f) of section 701 do not apply in making the declaration of value in the first or initial capital-stock tax return filed under title V of the Revenue Act of 1934. A CORPORATION MAY DECLARE ANY VALUE WHICH IN ITS JUDGMENT IS PROPER, PROVIDED IT IS AS OF THE DATE REQUIRED. Subsection (f) of the law should be considered to ascertain its effect on the adjusted declared value which will be required on subsequent capital-stock tax returns.

6. **Penalties.**—Failure to file on time, 25 percent of tax; failure to pay on time before assessment, interest at the rate of 1 percent a month; failure to pay within 10 days after issuance of notice and demand based on assessment approved by the Commissioner, 5 percent penalty and 1 percent interest a month on assessment. Severe penalties for willful failure to pay tax, keep records, file returns, or for false or fraudulent returns are imposed by law.

7. **Signatures and verification.**—The return shall be sworn to by the president, vice president, or other principal officer, and by the treasurer, assistant treasurer, or chief accounting officer. If receivers, trustees in bankruptcy, or assignees are operating the property or business of the corporation, such receivers, trustees, or assignees shall execute the return for such corporation.

8. **Regulations.**—For further information regarding the tax, see Capital Stock Tax Regulations, No. 64, (1934 Edition).

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1. Date of Incorporation. The University of Nanking was incorporated under the laws of the State of New York on April 19, 1911, with amendments giving additional powers on May 2, 1912, December 12, 1912, and October 18, 1923.

2. Detailed Explanation of Actual Activities. The University of Nanking began with the union effected in February, 1910, of the higher educational work in Nanking of the Board of Foreign Missions of the Methodist Episcopal Church, of the United Christian Missionary Society, and of the Board of Foreign Missions of the Presbyterian Church in the United States of America. Previous to the union, these three missions had been developing schools independently for about twenty-two years. The American Baptist Foreign Mission Society entered the union in 1911, cooperating in the College of Agriculture. For the purposes of administration, the University is organized into administrative units, each with a separate Dean or corresponding officer, and with its separate faculty or staff. Present administrative units take rank and precedence in the following order:-

- a. College of Arts
- b. College of Science
- c. College of Agriculture
- d. University Library
- e. University Hospital and School of Nursing
- f. University Middle School

The work of the University is of the highest grade, the Agricultural Department being outstanding in its particular field, and has been closely allied with the Chinese government in the working out of agricultural problems. The Board of Founders is the holding organization in America, the Board of Managers being the administrative body in China. The New York offices of the Board of Founders carry on the executive work required in America, such as handling of endowment funds, the solicitation and collection of gifts for the maintenance of the University, the purchase of supplies, and the selection of personnel for the University staff.

3. Sources From Which Income is Derived and Its Disposition. Income for the work of the University is derived from endowment funds, gifts from living donors, and fees from students to the University. The Chinese government has also contributed for work at the University in

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China. The income received from all sources is sent to China for the use of the University, with the exception of a very small amount used for the maintenance of the New York office.


4. Payments of Interest or Dividends on Capital Stock.

There is no capital stock, and no dividends or interest in any form are paid. The officers of the Board serve without remuneration.

5. Is Income Credited to Surplus, or May It Inure to the Benefit of Any Private Shareholder or Individual? No income or surplus accrues to the benefit of any private shareholder or individual.

6. Other Facts. Because of its outstanding achievement in agricultural lines and in Famine Relief work, the University has been awarded the control of the balance of the China Famine Funds, which until recently were under the control of the China Famine Fund Committee. A large portion of these funds are now in the hands of the National Savings & Trust Company, Washington, D.C. for safe-keeping.

I do hereby affirm that the foregoing is a true statement of the work of the University of Nanking and that the attached papers are exact copies of the original documents.

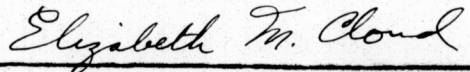


President, Board of Trustees

STATE OF NEW YORK)
) SS
CITY AND COUNTY OF NEW YORK)

Subscribed and sworn to before me this 25th day of

January 1935



NOTARY PUBLIC IN NEW YORK COUNTY
New York Co. District No. 10, Reg. No. 540-107
Certificate of Qualification
Commission Expires March 26th, 1935

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UNIVERSITY OF THE STATE OF NEW YORK

Charter of

THE UNIVERSITY OF NANKING

THIS INSTRUMENT WITNESSETH: That the Regents of the University of the State of New York have granted this charter incorporating Ralph E. Diffendorfer, Eben B. Cobb, Stephen J. Corey, F. Watson Hannan, Louis H. Severance, Archibald McLean, Frank A. Horne, Robert E. Speer, Joab H. Banton, and their associates and successors, under the corporate name of The University of Nanking, to be located in the city of Nanking, in the Province of Kiangsu, in the Empire of China, with nine trustees to be at first the persons named as incorporators to hold in the order of their naming, the first three for the year 1911, the second three for the year 1912, and the last three for the year 1913, and their successors to hold for terms of three years, to be chosen three each year--one by the Board of Foreign Missions of the Methodist Episcopal Church, one by the Foreign Christian Missionary Society, and one by the Board of Foreign Missions of the Presbyterian Church in the United States of America.

Other incorporated missionary organizations may, at any time, be affiliated with and made constituent, trustee-electing members of the corporation of the university, by the favoring vote of the managing boards of all of its then existing such constituent bodies; and each such so added constituent body shall be entitled to choose, as its representative, or representatives, to hold for a term of three years, an additional associate member, or members, not exceeding three, as the vote of affiliation shall provide, on the Board of Trustees of the University, and to choose, each three years, a successor, or successors, to such representative trustee, or trustees, to hold for a like term.

The trustees elected in accordance with the provisions of the charter granted April 19, 1922, and under the amendment to said charter granted December 12, 1912, may elect additional trustees to such a number that the total membership of the board shall not exceed twenty-four. The terms of office of one-third of the number of trustees thus elected for terms of three years each. After the first election of said additional trustees, their successors shall be elected by the entire Board of Trustees.

The University shall have power to acquire by grant, gift, purchase, devise or bequest, and hold and dispose of such real and personal property as the purposes of the corporation shall require. It may have departments of elementary, secondary and higher education, and may affiliate with its work other schools giving instruction in either of the said departments; but it shall not have power to confer degrees, except as shall be hereafter authorized or approved by the Regents of the University of the State of New York.

SEAL St. Clair McKelway, Vice Chancellor
A.S. Draper, Commissioner of Education
Granted April 19, 1911, by the Regents of the University of the State of New York, executed under their seal and recorded in their office. Number 2132.

SEAL St. Clair McKelway, Vice Chancellor
Amended May 2, 1912, by the Regents of the University of the State of New York, executed under their seal and recorded in their office. Number 2257.

SEAL St. Clair McKelway, Vice Chancellor, A.S. Draper, Commissioner of Education
Amended December 12, 1912, by the Regents of the University of the State of New York, executed under their seal and recorded in their office. Number 2309.

UNIVERSITY OF THE STATE OF NEW YORK
Charter of THE UNIVERSITY OF BANKING

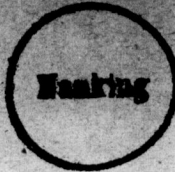
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SEAL Chester D. Lord
Chancellor
Frank P. Graves,
President of the
University.

Amended October 18, 1923, by the Regents
of the University of the State of New
York, executed under their seal and re-
corded in their office.
Number 3301.

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University of Banking

May 9, 1955

Commissioner of Internal Revenue
Treasury Department
Washington, D. C.

Re: IT:ES:RR:MM

Dear Sirs:

We greatly appreciate your letter of May 8th dealing with the application of University of Banking for exemption from federal income taxation.

In gratefully acknowledging this decision, may we assure you that in case any change in the charter is made, or if the status of our institution is altered, we will immediately notify your Department.

Very truly yours,

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TREASURY DEPARTMENT

OFFICE OF
COMMISSIONER OF INTERNAL REVENUE

WASHINGTON

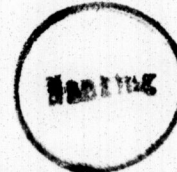
ADDRESS REPLY TO
COMMISSIONER OF INTERNAL REVENUE
AND REFER TO

MT:CST:LEE
584869

DEC 3 1935

IND

University of Nanking,
150 Fifth Avenue,
New York, New York.



Gentlemen:

Your capital stock tax return, Form 707, filed for the taxable year ended June 30, 1934, has been reviewed, and it appears that exemption from the tax is claimed for the reason that the corporation is one of the organizations enumerated in section 101 of the Revenue Act of 1934.

In accordance with the provisions of section 701(c) (1) of the Revenue Act of 1934, corporations enumerated in section 101 of that Act are not subject to the capital stock tax.

The claim for exemption from capital stock tax is sustained for the reason that the corporation has been held to be exempt from the Federal income tax under section 101 of the Revenue Act of 1934 or a similar section of a prior revenue act.

The corporation will not be required to file capital stock tax returns for subsequent taxable years as long as its income tax status remains unchanged.

By direction of the Commissioner.

Respectfully,

D. S. Bliss
D. S. Bliss,
Deputy Commissioner.

cc-Customhouse,
New York, New York.
MT:CST:110

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December 4, 1935

Commissioner of Internal Revenue
Treasury Department
Washington, D. C.

Attention: Mr. D. S. Bliss

Gentlemen:

We greatly appreciate your letter of December 3rd, NY:CST:LEE-584889, giving us information that the University of Banking is exempt from capital stock tax, and that hereafter form 707 need not be filled out.

We note that in the event of the status of the University changing at any time we are required to notify you; and in case it does happen, we shall be very glad indeed to notify you.

We are also advised that this information has been passed on to the Custom House in New York City.

Very truly yours,

CAE:BC

Assistant Treasurer

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