

PRINCETON UNIVERSITY

PRINCETON NEW JERSEY

PRESIDENT'S ROOM

May 1, 1961

Commissioner of Internal Revenue
Washington 25, D. C.

Re: Marie H. Robertson - Proposed Gift to
The Robertson Foundation

Dear Sir:

I am advised that the Internal Revenue Service has raised a question with respect to Princeton University's control of the Robertson Foundation. A statement on this question is requested of me.

From the very inception of the proposal to enlarge and strengthen the graduate division of the Woodrow Wilson School of Public and International Affairs, the prospective donor has fully understood and agreed that the University must have the responsibility for the direction, maintenance and operation of the School in all its aspects.

The incorporation of the Robertson Foundation as the vehicle for the gift implements this agreement by the stipulation that the majority of the Trustees of the Foundation, 4 out of 7, are to be University representatives. This is essential, since no university could plan so many permanent appointments to its faculty and develop an expanded program of this magnitude unless both policy control and continuous financial support for the program were assured to it. Also, the Certificate of Incorporation clearly states (paragraph 3) that the benefits of the Foundation shall accrue "to or for the use of Princeton University." The distribution of the earnings of the Foundation will be in the hands of the Trustees of the Foundation of whom, as stated, Princeton University has a controlling majority. Finally, only if Princeton ceases to be a tax exempt organization may the Foundation direct its funds to any other institution.

Thus, there is no question but that the donor intends this gift to be for the sole use of Princeton University. Indeed, the Trustees of Princeton University would not have agreed to accept this gift, and authorized this most important and greatly expanded program of post-graduate instruction for the public service, if they had not been advised and believed that the University controlled the Foundation through its majority representation.

Sincerely yours,

Robert F. Goheen

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