Bond Case Briefs

Municipal Finance Law Since 1971

IRS PLR: Intergovernmental Organization Qualified as Wholly Owned Instrumentality of Member Cities.

Intergovernmental organization requested a letter ruling that donations to the organization are tax deductible under § 170 because the organization, as a consolidated department of all incorporated cities in the State, is a wholly owned instrumentality of political subdivisions of the State.

The IRS ruled that the organization qualified as a wholly owned instrumentality of its member cities of the State within the meaning of Rev. Rul. 57-128.

Read the Private Letter Ruling.

Copyright © 2026 Bond Case Briefs | bondcasebriefs.com