Because of the potential cost involved in litigating a real estate tax case with either MIT or Harvard on the matter of technology transfer, and due to the likelihood of limited tax revenues even if such litigation is successful, the Board of Assessors will request a meeting with both major universities to review issues related to technology transfer in greater detail.

Very truly yours,

Robert W. Healy
City Manager

RWH/mec
Attachment

MEMORANDUM

To: Sally Powers, Director of Assessment
From: Wayne E. Hartwell, Esquire
Date: December 7, 1998

Re: Potential Taxation of University-Owned Real Estate Occupied for the Production of Royalties from Technology Transfer Arrangements.

Introduction.

Pursuant to the City Council Order of April 27, 1998, you have inquired as to "what steps the city can take to levy property taxes on University-owned properties which are currently tax-exempt and which are used for the research and development of patents and other products which profit University employees and the Universities themselves." The following outlines the results of preliminary research into that issue and is not intended to be definitive nor conclusive. Before it could be recommended that any further steps be initiated, additional research—of both a legal and a factual nature—would be necessary.

Statement of Facts.

As stated in the City Council's April 27, 1998 Order, "individuals, academic [institutions] and other non-profit institutions are reaping substantial profits from the sale of . . . patents developed through research conducted at area universities and hospitals . . . ." The term generally employed to describe these activities is "technology transfer." The source of the funding for the research can be either private corporations or governmental. One of the prevalent forms of technology transfer is patent licensing, in which a university licenses a patent of other valuable right to a corporation; in exchange for the grant of the license or right, the university receives fixed or contingent royalty payments annually or on some other negotiated basis: the university capitalizes on a new revenue stream and the corporation gains access to untapped technologies that might otherwise be prohibitively expensive to develop in its own laboratories.[1] In addition, in 1980, Congress passed landmark legislation known as the Bayh-Dole Act.[2] This law

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[1] *See generally*, Peter D. Blumberg, *"From 'Publish or Perish' to 'Profit or Perish': Revenues form University Technology Transfer and the § 501(c)(3) Tax Exemption,"* 145 U. PA. L. REV. 89, 90 (1996).

[2] Pub. L. No. 96-517, 94 Stat. 3018 (1980)(codified as amended at 35 U.S.C. §§ 200-212 [1998]).

permits universities take title to all inventions and discoveries arising from federally-funded research. The ability to "take title" affords universities the opportunity to license patented or patentable technologies, and in most cases the school is entitled to a share of the receipts. Bayh-Dole also requires universities to make every effort to ensure that these inventions were brought into public use as soon as practicable. Universities have found that, in most cases, the most efficient way to meet this latter requirement is by having commercial firms develop, manufacture and distribute products based on its researchers' discoveries. Lastly, Bayh-Dole also requires that if a university intends to take title to and license an invention, the professor-inventor *must* receive some portion of the proceeds.[3]

The technology transfer activities of two prominent Cambridge institutions, Harvard University and the Massachusetts Institute of Technology, will be examined briefly below.

Harvard.

Harvard recognizes the importance and benefits of technology transfer and encourages scientifically-productive research collaborations between its scientists and for-profit companies. (Source: http://www.techtransfer.harvard.edu/Research-Discovery.html#How Does Technology).

Harvard's Office for Technology and Trademark Licensing (OTTL) and Harvard Medical School's Office of Technology Licensing and Industry-Sponsored Research (OTL) are the two entities at Harvard which work cooperatively to transfer University technology to the commercial sector for development of products. (Source:http://www.techtransfer.harvard.edu/Research-Discovery.html#OTTL and OTL: Resources). The OTTL and OTL offices are staffed by licensing professionals who are both generalists in technology management, and specialists in specific fields of research. *Id.* OTTL and OTL exercise full control over the technology transfer process, including seeking appropriate protection for intellectual property, managing the licensing process, and collecting and distributing associated fees and royalties. *Id.* Not insignificantly, all legal expenses associated with patent filing and prosecution, and their administration, are borne by OTTL and OTL. *Id.*

The "Mission Statement" of the Office of Technology Licensing & Industry-Sponsored Research (Harvard Medical School) states that its objectives are:

> To benefit humankind by actively promoting the timely introduction of Medical School advances in biomedical technology into the commercial market place while, at the same time,

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[3] 35 U.S.C. § 202(c)(7)(B) (1998).

> *generating a stable and growing income stream from corporate sources for the support of basic medical research.*

(Source: http://www.techtransfer.harvard.edu/GenInfoOTL.html)(emphasis supplied)

The "Mission Statement" of the Office for Technology and Trademark Licensing states that its goals are to:

> bring University-generated intellectual property into public use as rapidly as possible while protecting academic freedoms and *generating a financial return to the University, inventors and their departments*. To serve as a resource to faculty and staff on interactions with industry.
>
> To protect and control uses of Harvard's names and symbols (shields) and to license their use on approved merchandise, *generating income for support of undergraduate financial aid.*

(Source:http://www.techtransfer.harvard.edu/GenInfoOTTL.html)(emphasis supplied)

In furtherance of those goals and objectives, in 1997 for example, OTTL and OTL received 119 new invention disclosures from Harvard faculty, filed 61 patent applications on their behalf, and concluded 67 license agreements with industry. (Source: http://www.techtransfer.harvard.edu/FAQ.html). For 1997 revenue was $16.5 million in royalties and fees from licenses and options, which amount does not include reimbursements of legal fees. *Id.* Pursuant to Harvard's "Statement of Policy in Regard to Inventions, Patents and Copyrights," inventors receive thirty-five percent of net royalty income up to $50,000 and twenty-five percent of amounts in excess of $50,000 (cumulative). *Id.* For 1996, OTTL and OTL collected—and distributed—7.6 million in royalties. *Id.*

M.I.T.

The M.I.T. Technology Licensing Office (TLO) is a department of the university, reporting to the Vice President of Research, who in turn reports to the Provost. (Source: http://web.mit.edu/afs/athena.mit.edu/org/t/tlo/www/qfa.html). The TLO has a staff of 26 (11 licensing professionals and 14 administrative and support personnel) who are responsible for identifying marketable technologies, managing the patenting and copyrighting of these technologies, finding license[e]s to develop the technologies and negotiating licenses. *Id.*

The "Mission Statement" of the M.I.T. TLO is:

> to benefit the public by moving results of M.I.T. research into societal use via technology licensing, through a process which is consistent with academic principles, demonstrates a concern for the welfare of students and faculty, and conforms to the highest ethical standards.
>
> This process will benefit the public by creating new products and promoting economic development.
>
> It will help M.I.T.:
>
> show tangible benefits of taxpayers' support for fundamental research
> attract faculty and students; generate industrial support of research
> *generate discretionary income*
> generate new job opportunities for graduates
>
> [M.I.T.] will continue to be a world class model of excellence in university technology licensing.

(Source: http://web.mit.edu/afs/athena.mit.edu/org/t/tlo/www/mission.html) (emphasis supplied).

Stated differently, "The mission of the . . . (TLO) is to facilitate the transfer of technology from MIT (and the Whitehead Institute) to industry, and thereby to benefit the public good through the development and subsequent sale of commercial products. *A secondary goal is to generate unrestricted funds to motivate inventors and to support research and education at MIT.*" (Source: http://web.mit.edu/communications/pres97/06.1/html) (emphasis supplied).

Fiscal Year 1997 was a record-breaking year for the TLO, with income of $21.2 Million, of which $5.7 Million was cash-in of equity (the previous record year was FY '92, with $16.2 Million, of which $8.9 Million was cash-in of equity). *Id.* The remaining $15.0 Million of non-equity-related income in FY '97 was a very substantial increase over FY '96 of $10.2 Million and was due to a number of major events, in addition to continuing business, including cash-in of equity in three startup companies and substantial increases in royalties from several products on the market. *Id.*

During Fiscal Year 1997, the TLO consummated 59 new technology licenses, and 11 new option agreements and currently has 455 active licensees. *Id.* The TLO also sold 96 end-use software licenses and signed up 20 new trademark licensees in FY '97, and started 8 new companies. *Id.* With 455 active licenses in house and about 115 startup companies extant (with equity in about 25 of them), the TLO expects that royalty streams will continue to mature and companies will reach equity liquidity. *Id.* The stream of new inventions continues constant at about 350 per year (359 in this fiscal year), refilling the pipe line. *Id.*

At M.I.T, inventors share one-third of royalties after deduction of a fifteen percent administration fee and any un-reimbursed patent expenses. There is no cap on inventor royalties. In 1997, over 4.6 million dollars was distributed to inventors. (http://web.mit.edu/afs/athena.mit.edu/org/t/tlo/www/qfa.html).

The Massachusetts Real Property Tax Exemption for Educational Institutions *v.* the Profit Motive.

The exemption from liability for local personal property and real estate taxes which is afforded to educational institutions is found in clause Third of section five of chapter fifty-nine of the Massachusetts General Laws, which provides in pertinent part:

> Third, Personal property of a charitable organization, which term, as used in this clause, shall mean . . . a literary, benevolent, charitable or scientific institution . . . incorporated in the commonwealth . . . and real estate owned by . . . a charitable organization and occupied by it or its officers for the purposes for which it is organized or by another charitable organization or organizations or its or their officers for the purposes of such other charitable organization or organizations [shall be exempt]; . . . provided, however, that:—
>
> (a) If any of the income or profits of the business of the charitable organization is divided among the stockholders, the trustees or the members, or is used or appropriated for other than literary, benevolent, charitable, [or] scientific purposes . . . its property shall not be exempt . . . .

The three key elements are, therefore, (1) ownership by the charitable institution; (2) occupancy for the charitable purposes for which the institution is organized; and (3) no private participation in income or profits or use of those funds for other than charitable purposes.

It is not apparent at this juncture that any issues regarding ownership of particular real property are presented by the City Council's April 27 Order. Concerning the second element, Massachusetts case law is quite emphatic that occupancy by a charitable institution for its charitable purposes is essential to the exemption.

"It is the character of the use to which the property is put, and not of the party who uses it, that settles the question of exemption from taxation." *Assessors of Quincy* v. *Cunningham Foundation*, 305 Mass. 411, 417 (1940). Thus an ostensibly charitable organization is not entitled to exemption from the real estate tax pursuant to G.L. c. 59, § 5, Third unless its real estate is occupied for the charitable purposes for which it is organized: "[s]uch occupancy . . . signifies an active appropriation to the immediate uses of the charitable cause for which the owner was organized . . . [and] the nature of the occupation must be such as to contribute immediately to the promotion of the charity and physically to participate in the forwarding of its beneficent objects." *Babcock* v. *Leopold Morse Home for Infirm Hebrews & Orphanage*, 225 Mass. 418, 421-22 (1917).

Occupancy of real estate by a charitable institution for the purposes of generating income to advance the institution's charitable objectives does not satisfy clause Third. As the Supreme Judicial Court made clear in *Hairenik Association, Inc.* v. *Boston*, 313 Mass. 274, 279 (1943):

> "The exemption provided for in the statute is of real estate occupied by charitable and certain other institutions for the purposes for which they were incorporated, that is, for the literary, benevolent, charitable or scientific purposes for which they were incorporated. It is settled that the 'occupation of real estate by an institution which entitles it to exemption of such real estate is occupation directly for the charitable purposes for which it is incorporated and *not occupation for profit even if such profit is used for such charitable purposes.*' *Assessors of Boston* v. *Garland School of Home Making*, 296 Mass. 378, 391 [1937], and cases cited. The 'distinction is between activities primarily commercial in character carried on to obtain revenue to be used for charitable purposes . . . and activities carried on to accomplish directly the charitable purposes of the corporation, incidentally yielding revenue.' *McKay* v. *Morgan Memorial Co-operative Industries & Stores, Inc.* 272 Mass. 121, 124 [1930], and cases cited."

(emphasis supplied). Thus, if an educational institution "seeks to promote its educational and charitable objects by obtaining profit from its property and filling its treasury for future use, that purpose is not within the exempting clause" of G.L. c. 59, § 5, Third. *Mount Hermon Boys' School* v. *Gill*, 145 Mass. 139, 148

(1887) (charitable boarding school's use of its farm to raise provisions for consumption by its scholars, with some incidental sales of unneeded products, "is to be distinguished from the use of [the farm] to increase the funds in its treasury, and thereby enable it to do its charitable work."). *Accord Trustees of the Wesleyan Academy* v. *Inhabitants of Wilbraham*, 99 Mass. 599, 604 (1868)(If charitable boarding house "carried on [its] farm and sold the produce at its market price for the use of the students, in order to make a profit as farmers or as dealers in milk and vegetables[,]" the real estate would not be exempt. "But, as it is managed, the object not being to make a profit to the funds of the institution, but to benefit the students [by furnishing cheap board], it is . . . used for the purpose for which the institution was incorporated . . . ."). "An occupation and use of real estate to produce income to be expended for the purposes for which the institution was incorporated in not within the statute, while an occupation whose dominant purpose is directly to accomplish some one of the objects for which the corporation was established is within it." *Emerson* v. *Trustees of Milton Academy*, 185 Mass. 414, 415 (1904).

The fact that an institution's activities may generate some amount of incidental profit is not fatal to the exemption, so long as profits are not the dominant objective of occupancy. "If incidentally there are results of the use which would not entitle to property to exemption, that is immaterial, so long as the dominant purpose of the occupation is within [G.L. c. 59, § 5, Third]." *Assessors of Boston* v. *Garland School*, 296 Mass. 378, 393 (1937)(where occupation of premises directly for educational purposes resulted indirectly in profit from tuition, which was added to capital account, result was "incidental.").

The basic rule derived from the cases, then, is that where the substantial use and occupation of a charitable organization's real estate is for the purpose of deriving income from it, it makes no difference whether that income is expended to further the organization's charitable purposes, the property is subject to taxation nonetheless. *Salem Lyceum* v. *Salem*, 154 Mass. 15, 17 (1891)(exemption "does not extend to estate owned by [a charity], and allowed by it to be occupied by others, with the purpose of deriving income to expend in" advancing its charitable purposes.").

The third element of the exemption under clause Third of G. L. c. 59, Section 5—that there be no private participation in the income or profits of a charity nor use of those funds for other than charitable purposes—has been discussed only rarely by Massachusetts appellate courts and no case has been discovered in which an organization's expenditures fell within the "used or appropriated" language of G. L. c. 59, § 5, Third (a).

It is clear, at least by implication, that operating expenses of the charitable organization, even if they support further income production, do not invoke G. L.

c. 59, § 5, Third (a), and thereby cause complete loss of tax-exempt status, so long as the resulting income is used for charitable purposes. *New England Legal Foundation v. Boston,* 423 Mass. 602, 612 (1996). *See Brockton Knights of Columbus Bldg. Ass'n* v. *Assessors of Brockton*, 321 Mass. 110, 113-114 (1947) (particular income-producing property may not be exempt despite charitable nature of taxpayer). Similarly, capital expenditures that enable an expansion of charitable activities do not invoke this exception. *New England Legal Foundation v. Boston, supra* at 612-13; *Assessors of Boston* v. *Garland School*, 296 Mass. 378, 393 (1937). On the other hand, the prohibition against inurement to "insiders" would preclude, for example, exemption for the property of a group medical practice or clinic where, for example, the physicians "employed" by it serve on its board or otherwise exert control over its finances. *See Harvard Community Health Plan* v. *Assessors of Cambridge*, 384 Mass. 536, 541 (1981). *See also Fisher School* v. *Assessors of Boston*, 325 Mass. 529, 535 (1950)(where several family members appeared on payroll of school seeking exemption, it was open to Appellate Tax Board to consider whether salaries were reasonable and paid for services actually rendered or whether they were merely a "cloak" to conceal distribution of profits).[4]

In evaluating whether the royalty cut which faculty-inventors receive might operate to invoke the prohibition of clause Third (a), either as private inurement or as use of university profits for other than charitable educational purposes, it should be noted that professors and instructors are "officers" of an educational institution within the terms of G.L. c. 59, § 5, Third. *Williams College* v. *Williamstown*, 167 Mass. 505, 508 (1897); *Phillips Academy* v. *Andover*, 175 Mass. 118, 121 (1900).

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[4] Some early commentary hinted that the "used or appropriated" language was a residual clause to ensure that any form of attempted distribution by a charitable organization caused loss of tax-exempt status. *See* P. NICHOLS, TAXATION IN MASSACHUSETTS 244 (3d ed. 1938): "Some controversies have arisen when assessors have contended that profits have been divided through the device of excessive salaries to the officers of an educational institution . . . . If such practices were demonstrated to exist, doubtless the exemption would be lost." (footnote omitted). The referenced case was *Suffolk Law School* v. *Assessors of Boston*, 2 Mass. Bd. Tax App. Rep. 242 (1935), *rev'd sub nom,* 295 Mass. 489 (1936). There Board member Lincoln, in dissent, argued that Suffolk Law School exhibited "all the earmarks of a private business enterprise, conducted primarily for the benefit of [the founder and] Dean . . . and his family[]" where his compensation "went far beyond the amount customarily paid as salary for similar services." *Id.* at 259-60.

Analogous Federal Law: the Internal Revenue Code § 501(c)(3) Income Tax Exemption for University Technology Transfer Revenues.

Under § 501(a) of the Internal Revenue Code ("I.R.C."), an organization that is described under I.R.C. § 501(c) is granted an exemption from the income tax on corporations. Provided that an organization is both organized and operated exclusively for one or more of the charitable purposes listed in § 503(c), it will be classified as an exempt organization. Section 501(c)(3) specifically exempts "[corporations] . . . organized exclusively for . . . charitable, scientific . . . or educational purposes." Since most research universities engage in both scientific and educational activities, they qualify for exempt status and as a result the majority of their revenues are not subject to taxation.

Not *all* of a charitable organization's income from all the activities in which it might participate is exempt, however. If a university engages in activities that are unrelated to the charitable purposes for which the initial tax exemption was granted, the appropriate income tax will be imposed through the "unrelated business income tax" under I.R.C. § 511(a)(1) ("UBIT"). *See, e.g., Iowa State Univ. of Sci. & Tech.* v. *United States*, 500 F.2d 508, 516 (Ct. Cl. 1974). The imposition of the tax on unrelated business income was a Congressional response to the concern that tax-exempt organizations were competing unfairly with taxable businesses. *E.g., Sierra Club, Inc.* v. *Commissioner*, 86 F.3d 1526, 1533 (9th Cir. 1996).

To establish that a charity is earning unrelated business income, the Internal Revenue Service ("I.R.S.") must demonstrate that its activities: (1) comprise a trade or business; (2) which is regularly carried on; and (3) which is not substantially related to the organization's tax-exempt purpose. *E.g., State Police Ass'n of Massachusetts* v. *Commissioner*, 125 F.2d 1, 5 (1st Cir. 1997). Legal commentators have concluded that most of the research undertaken by a university directed at technology transfer would be considered a trade or business if it were conducted by a commercial enterprise. *E.g.*, Consuelo L. Kertz, "*Tax Exempt Organizations and Commercially Sponsored Scientific Research*," From the description of the activities of Harvard and M.I.T. relating to their technology transfer efforts, it would be fair to characterize those efforts as "regularly carried on." As for the third element, other commentators have concluded that a great deal of technology transfer may be so attenuated from the original exempt purposes of universities—for, among other reasons, the facts that universities may be drawing income from activities that do not provide an educational benefit for enrolled students and that the promised rewards may compromise the pursuit of basic (non-revenue-producing) science that the exemption was intended to foster—that the revenue ought to be subject to taxation. *See, e.g.*, Peter D. Blumberg, *supra*, n.1 at 120-147. While that may be debated as a matter of sound tax policy, the fact is at the present time revenues from technology (assuming they would otherwise constitute unrelated business income) are expressly exempted from Federal income taxation.

The first exemption is contained in I.R.C. § 512(b)(8), which states that "[I]n the case of a college, university, or hospital, there shall be excluded all income derived from research performed for any person . . . ." The other relevant exclusion from UBIT is found in I.R.C. § 512 (b)(2), which excludes "all royalties . . . whether measured by production or by gross or taxable income." Research universities are thus not liable to income taxation for revenues flowing from research activities (*i.e.*, research conducted with private funding) or from the licensing of patents.

What is relevant about the Federal taxation scheme of taxation relating to university royalty income is not that the revenues are, by statute, exempt, but the analysis that would be applied were those revenues not so expressly exempt. That is, are the universities conducting basic research conformable to their charitable, educational purposes or has the research effort, to a greater or lesser extent, shifted toward those areas and projects which show the greatest potential for commercial return? The so-called "Mission Statements" of Harvard ("generating a financial return to the University, inventors and their departments;" "generating income for support of undergraduate financial aid;" "generating a stable and growing income stream from corporate sources for the support of basic medical research") and M.I.T. ("generate discretionary income") indicate that such an analysis may disclose facts sufficient to support a conclusion that some university real estate houses "activities primarily commercial in character carried on to obtain revenue to be used for charitable purposes . . . ." *McKay* v. *Morgan Memorial Co-operative Industries & Stores, Inc.* 272 Mass. 121, 124 (1930). That would place the particular real estate outside the exemption from taxation contemplated by § 5, clause Third.

A second point of Federal law which is analogous is the "Private Benefit Rule" mandated by I.R.C. § 501(c)(3) and which provides that in order to qualify for exempt status, no part of the net earnings of an organization may inure to the benefit of a private individual, which closely parallels § 5, clause Third (a). One suggested scenario in which that rule might be invoked concerns excessive compensation, as follows:

> Faculty researchers are often able to supplement their salaries through a contracted-for share of subsequent licensing, royalty and other technology-transfer income. . . . One could certainly envision a private benefit inquiry . . . if the Service were to determine that the compensation of the professoriate so closely resembled that of researchers in the private sector that there existed no discernible

> difference between the compensation of, for example, a Harvard professor and a for-profit researcher. If technology-transfer growth were to result in such identical compensation levels, the Service might find a violation of the private benefit rule and potentially could revoke the school's general tax-exempt status.

Peter D. Blumberg, *supra*, n.1 at 107 (footnotes omitted). See also Bertrand M. Harding, Jr. & Edgar D. McClellan, "*Unreasonable Compensation: the Hidden Issue in the IRS College and University Examination Guidelines*," 20 J. Coll. & Univ. Law 111 (1993). While it should not be reasonably contemplated that the general tax-exempt status of Harvard or M.I.T. under § 5, clause Third might be placed in jeopardy, inquiry into the levels of faculty-inventors' compensation may nonetheless be warranted as bearing on the "commerciality" of their research endeavors as opposed to basic research which truly serves an educational purpose.

Conclusion.

As stated at the outset, the foregoing is preliminary. Proceeding further toward a resolution of the issues framed by the City Council's April 27 Order would entail, it should be obvious, a rather massive factual investigation. It must also be emphasized that in the end all that will be subject to real estate taxation are those identifiable portions, if any, of the universities' real estate which can be demonstrated to be occupied predominantly for other than their charitable educational and scientific purposes. There is at this juncture no means to estimate the extent to which the universities' real estate may be occupied for other than qualifying charitable purposes nor to forecast any level of potential tax dollars attributable to such occupancy.

10.

CITY OF CAMBRIDGE
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EXECUTIVE DEPARTMENT
ROBERT W. HEALY
City Manager

RICHARD C. ROSSI
Deputy City Manager

December 14, 1998

To The Honorable, The City Council:

In response to Awaiting Report Item No. 1, regarding a report on what steps the City can take to levy property taxes on University owned properties which are currently tax-exempt, please find attached a memorandum prepared by Wayne Hartwell an attorney for the Assessor's Department, which discusses the issues surrounding the potential taxation of university owned real estate which is occupied for the production of royalties from technology transfers.

As the memorandum states both Harvard and MIT have offices designated for the licensing of technology transfers for the purpose of moving inventions and technology into the broader world. While the memorandum reviews these offices and applicable federal tax laws, it is the section beginning on page 5 that deals with applicable Massachusetts property tax laws regarding exemptions. To qualify for exemptions from real estate taxes in Massachusetts, a building owned by a literary, benevolent, charitable or scientific institution must meet three basic requirements: ownership by the organization; occupancy by the organization; and no private participation in income or profits or use of those funds for other than charitable purposes. It is in the third requirement concerning no private participation in income where the Board of Assessors would have reason to consider removing real estate tax exemptions, due to the fact that professors involved in technology development and licensing can and do receive financial gain.

However, this does not mean that the Board will move quickly to tax university buildings involved in the development of technology which results in royalties or income to individual professors. The levying of property taxes on such a building would first require factual investigation (perhaps massive) at a cost which even after successful litigation would produce limited tax revenues due to the fact only those portions of a building which proved to be occupied in part for other than charitable and scientific purposes can be taxed not the whole building. Additionally, as both Harvard and MIT are already major taxpayers in Cambridge, litigation that found such portions of previously exempt buildings taxable would most likely only lead to such programs merely being moved to a building already taxed thus generating no additional tax revenue for the City.

Consent Agenda #10 8325

8325

Relative to AW Report #1,
regarding a report on what
steps the City can take to levy
property taxes on University
owned properties, which are
currently tax-exempt.

Hearing scheduled 2/4/99
Hearing not held due to
Hearing Cancelled
hearing to be rescheduled

In City Council December 14, 1998

Referred to
Finance Committee on
Motion of C. Born
12/15/98
Sent to C. Sullivan