

FIDELITY TRUST COMPANY

OF HOUSTON

LEGAL DEPARTMENT

W. W. MOORE, General Counsel
J. Y. POWELL, General Attorney
T. J. ARNOLD, General Attorney
C. S. HARRINGTON
W. W. MOORE, JR.

Houston, Texas,
February 4, 1931.

HOUSTON NEGRO HOSPITAL
Nurses Home

CONFIDENTIAL

Mr. J. S. Cullinan,
Building.

Dear Sir:

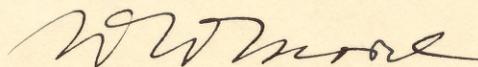
This owns receipt of your letter of February 4th.

The statute provides that taxpayer may deduct up to fifteen per cent of net income each year for contributions made for certain purposes, i.e., Red Cross, Community Chest, Houston Negro Hospital, etc.

Pledged but unpaid contributions for such purposes are not deductible until paid, where taxpayer keeps his books on cash receipts and disbursements basis.

Such deductions do not apply to estates under administration, except in so far as the will directs such contributions. Accordingly, in your case your deductions can be charged only against your separate earnings.

Very truly yours,



WWM:EL

JSC(HO)-JYP (c)