902 OPINIONS

to incorporate savings societies', passed April 16, 1867" elects, by virtue of the provisions of Section 710-145 of the General Code, to continue its business under the provisions of the general banking law of Ohio, it may thereafter engage in business as a savings bank, subject to the provisions of law applicable thereto, but this authority does not extend to such society the right to engage in commercial banking.

Respectfully,
EDWARD C. TURNER,
Attorney General.

1966.

APPROVAL, BONDS OF LIVERPOOL TOWNSHIP, MEDINA COUNTY, OHIO—\$5,100.00.

COLUMBUS, OHIO, April 13, 1928.

Industrial Commission of Ohio, Columbus, Ohio.

1967.

TAXATION—EXEMPTION OF PROPERTY BELONGING TO MISSIONS—CHURCH SCHOOLS—ORPHANS' AND OLD PEOPLE'S HOMES.

SYLLABUS:

Property belonging to missions, church extension work, orphans' and old people's homes and church schools used exclusively for charitable purposes is exempt from taxation in Ohio.

The Tax Commission of Ohio, Columbus, Ohio.

Gentlemen:—This will acknowledge receipt of your recent communication, which reads:

"Enclosed you will find a letter our office has received from Reverend R. A. S. In this letter he has asked us a question concerning the taxability of certain annuities here in Ohio.

The question 'Are Annuities to Missions, Church Extension Work, Orphans' and Old People's Homes, and Church Schools taxable in Ohio?' We would like an official opinion from your office covering this question and would indeed be pleased if your office perhaps can give special attention to this matter."