INTERNAL REVENUE SERVICE P. 0. BOX 2508

CINCINNATI, OH 45201

Date: **AUG122m9**

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C/O REED SMITH LLP CHERYL HO REED SMITH

101 2ND STREET SUITE 1800 SAN FRANCISCO, CA 94105

DEPARTMENT OF THE TREA SURY

Employe r Identifi cation Number: 83-1 737141

DLN:

29053196308009

Contact Person:

MICHAEL T UPSHAW ID# 17310

Cont act Telephone Number: (877) 829- 5500

Accounting Period Ending: July 31

Public Charity Status: 170(b)(1)(A)(vi)

Form 990 /99 0- EZ/99 0- N Requ ired : Yes

Effective Date of Exempt ion: April 03, 2018

Contribution Deductibility: Yes

Addendum Applies: No

Dear Applicant:

We're pleased to tell you we determined you' re exempt from federal income tax under Int ernal Revenue Code (!RC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under

Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a publi c charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/9 90- EZ/990- N, our records show you're req uired to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990 - N, thee-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to [www.irs.gov](http://www.irs.gov/) / charities. Enter "4221-PC" in the search ba r to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

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We sent a copy of this letter to your representative as indicated in your

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power of attorney.

Sincerely,

Director, Exempt Organizations Rulings and Agreements