

INTERNAL REVENUE SERVICE  
P. O. BOX 2508  
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: **JAN 08 2016**

THE KAPANI FAMILY CHARITABLE  
FOUNDATION  
C/O REBECCA S MARICONE  
1750 TYSONS BLVD STE 1000  
MCLEAN, VA 22102

Employer Identification Number:  
47-2298390  
DLN:  
17053218307025  
Contact Person:  
S J YINGLING ID# 31698  
Contact Telephone Number:  
(877) 829-5500  
Accounting Period Ending:  
December 31  
Form 990-PF Required:  
Yes  
Effective Date of Exemption:  
November 7, 2014  
Addendum Applies:  
No

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) 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 private foundation within the meaning of Section 509(a).

We're approving your individual grant-making procedures under IRC Section 4945(g)(1). This means scholarships you grant according to your submitted procedures won't be taxable expenditures under Section 4945(d)(3). We determined awards made under these procedures are "scholarship or fellowship grants" within the meaning of Section 117(a) and are excludable from the recipient's gross income, subject to the limitations provided in Section 117(b) including to the extent that such grants are actually used for qualified tuition and related expenses within the meaning of Section 117(b)(2).

We're approving your individual grant-making procedures under IRC Section 4945(g)(3). This means grants or educational loans awarded according to your submitted procedures won't be taxable expenditures under Section 4945(d)(3).

You're required to file Form 990-PF, Return of Private Foundation or Section 4947(a)(1) Trust Treated as Private Foundation, annually, whether or not you have income or activity during the year. 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

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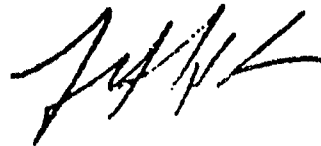
THE KAPANI FAMILY CHARITABLE

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/charities](http://www.irs.gov/charities). Enter "4221-PF" in the search bar to view Publication 4221-PF, Compliance Guide for 501(c)(3) Private Foundations, which describes your recordkeeping, reporting, and disclosure requirements.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey I. Cooper". The signature is stylized with a large, sweeping "J" and a long horizontal stroke at the end.

Jeffrey I. Cooper  
Director, Exempt Organizations  
Rulings and Agreements