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

Date: NOV 08 2017

ROBERT NELSON FOUNDATION C/O JEFFREY SIEGEL 1055 WILSHIRE BLVD STE 1710 LOS ANGELES, CA 90017

Employer Identification Number: 82-1673538 DLN: 17053191305007 Contact Person: PETER A ORLETT ID# 31436 Contact Telephone Number: (877) 829-5500 Accounting Period Ending: April 30 Form 990-PF Required: Yes Effective Date of Exemption: May 16, 2017 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).

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 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. 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.

ROBERT NELSON FOUNDATION

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

Sincerely,

stephen a. martin

Director, Exempt Organizations Rulings and Agreements