

Internal Revenue Service  
District Director

Department of the Treasury  
Entered in PCG

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JUN 26 1990

PATTERSON, BELKNAP, WEBB & TYLER  
R. H. M. F.

31 HOPKINS PLAZA  
BALTIMORE, MD 21201

Date: JUN 20 1990

SABRE FOUNDATION INC  
C/O ROBERT H M FERGUSON  
PATTERSON BELKNAP WEBB & TYLER  
30 ROCKEFELLER PLAZA  
NEW YORK, NY 10112

Employer Identification Number:  
23-7042881  
Contact Person:  
MS. L. HOWERTON  
Contact Telephone Number:  
(202) 376-0035  
Our Letter Dated:  
May 3, 1985  
Addendum Applies:  
Yes

Dear Applicant:

This modifies our letter of the above date in which we stated that you would be treated as an organization which is not a private foundation until the expiration of your advance ruling period.

Your exempt status under section 501(a) of the Internal Revenue Code as a organization described in section 501(c)(3) is still in effect. Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the code because you are an organization of the type described in section 509(a)(1) and 170(b)(1)(A)(vi).

Grantors and contributors may rely on this determination unless the Internal Revenue Service publishes notice to the contrary. However, if you lose your section 509(a)(1) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act, or the substantial or material change on the part of the organization that resulted in your loss of such status, or if he or she acquired knowledge that the Internal Revenue Service had given notice that you would no longer be classified as a section 509(a)(1) organization.

As of January 1, 1984, you are liable for taxes under the Federal Insurance Contributions Act (social Security taxes) on remuneration of \$100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

You are required to file Form 990 only if your gross receipts each year are normally more than \$25,000. For guidance in determining whether your gross receipts are "normally" more than \$25,000, see the instructions for Form 990. If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. A penalty of \$10 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$5,000 or 5 percent of your gross receipts for the year, whichever is less. This penalty may also be charged if a return is not complete, so please be sure your return is complete before you file it.

If we have indicated in the heading of this letter that an addendum applies, the addendum enclosed is an integral part of this letter.

Letter 1050(DO/CG)

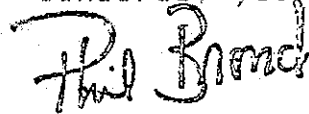
SABRE FOUNDATION INC

Because this letter could help resolve any questions about your private foundation status, please keep it in your permanent records.

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

If you have any questions, please contact the person whose name and telephone number are shown above.

Sincerely yours,



District Director

Note: This letter supersedes our letter dated May 29, 1990 to correct the classification from section 509(a)(2) to 509(a)(1) and 170(b)(1)(A)(vi).