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

Date: MAY 3 1 2005

JOHN WILLIAM POPE CIVITAS INSTITUTE INC 3401 GRESHAM LAKE RD RALEIGH, NC 27615 Employer Identification Number:
20-2454741

DLN:
17053111003045

Contact Person:
JOAN C KISER ID# 31217

Contact Telephone Number:
(877) 829-5500

Accounting Period Ending:
JUNE 30

Effective Date of Exemption:
MARCH 9, 2005

Dear Applicant:

We are pleased to inform you that upon review of your application for tax exempt status we have determined that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code. Contributions to you are deductible under section 170 of the Code. You are also qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Code. Because this letter could help resolve any questions regarding your exempt status, you should keep it in your permanent records.

Based on the information you submitted with your application, we have determined you are likely to qualify as a private operating foundation described in section 4942(j)(3) of the Code. Accordingly, you are treated as a private operating foundation for your first year. After that, you will be treated as a private operating foundation as long as you continue to meet the requirements of section 4942(j)(3). You are required to file Form 990-PF annually.

Please see enclosed Information for Private Foundations Exempt Under Section 501(c)(3) for some helpful information about your responsibilities as an exempt organization. You can obtain information about private foundation status by requesting Publication 578, Tax Information for Private Foundations and Foundation Managers.

JOHN WILLIAM POPE CIVITAS INSTITUTE

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

Sincerely,

Lois G. Lerner

Director, Exempt Organizations

Rulings and Agreements

Enclosure: Information for Private Foundations Exempt Under Section 501(c)(3)