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

Date: MAR 2 9 2006

SPARTAN ALUMNI ROWING ASSOCIATION C/O TIMOTHY A MARCOVY 1468 W NINTH ST STE 700 CLEVELAND, OH 44113

Employer Identification Number: 03-0531306 DLN: 17053031038016 Contact Person: ID# 31228 GERALD MINK Contact Telephone Number: (877) 829-5500 Accounting Period Ending: DECEMBER 31 Public Charity Status: 170(b)(1)(A)(vi) Form 990 Required: YES Effective Date of Exemption: NOVEMBER 13, 2003 Contribution Deductibility: YES Advance Ruling Ending Date: DECEMBER 31, 2007

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.

Organizations exempt under section 501(c)(3) of the Code are further classified as either public charities or private foundations. During your advance ruling period, you will be treated as a public charity. Your advance ruling period begins with the effective date of your exemption and ends with advance ruling ending date shown in the heading of the letter.

Shortly before the end of your advance ruling period, we will send you Form 8734, Support Schedule for Advance Ruling Period. You will have 90 days after the end of your advance ruling period to return the completed form. We will then notify you, in writing, about your public charity status.

Please see enclosed Information for Exempt Organizations Under Section 501(c)(3) for some helpful information about your responsibilities as an exempt organization.

SPARTAN ALUMNI ROWING ASSOCIATION

Lois G. Lerner Director, Exempt Organizations Rulings and Agreements

Enclosures: Information for Organizations Exempt Under Section 501(c)(3)

Statute Extension

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

Date:

APR 0 9 2006

SPARTAN ALUMNI ROWING ASSOCIATION C/O TIMOTHY A MARCOVY 1468 W NINTH ST STE 700 CLEVELAND, OH 44113

Employer Identification Number:

03-0531306

DLN:

17053082819098

Contact Person:

ID# 31494 CARLY D YOUNG

Contact Telephone Number:

(877) 829-5500

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

Our letter dated March 2006, stated you would be exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code, and you would be treated as a public charity, rather than as a private foundation, during an advance ruling period.

Based on the information you submitted, you are classified as a public charity under the Code section listed in the heading of this letter. Since your exempt status was not under consideration, you continue to be classified as an organization exempt from Federal income tax under section 501(c)(3) of the Code.

Publication 557, Tax-Exempt Status for Your Organization, provides detailed information about your rights and responsibilities as an exempt organization. You may request a copy by calling the toll-free number for forms, (800) 829-3676. Information is also available on our Internet Web Site at www.irs.gov.

If you have general questions about exempt organizations, please call our toll-free number shown in the heading.

Please keep this letter in your permanent records.

Sincerely yours,

Robert Choi Director, Exempt Organizations Rulings and Agreements