Internal Revenue Service

Date: October 26, 2004

Benton Hall Corporation Benton Hall School 2420 Bethlehem Loop Road Franklin, TN 37069 Department of the Treasury P. O. Box 2508 Cincinnati, OH 45201

Person to Contact:

Ronnie Clemons 31-04020 Customer Service Representative

Toll Free Telephone Number: 8:00 a.m. to 6:30 p.m. EST 877-829-5500

Fax Number: 513-263-3756

Federal Identification Number: 62-1012762

Dear Sir or Madam:

This is in response to your request of October 26, 2004, regarding your organization's taxexempt status.

In June 1978, we issued a determination letter that recognized your organization as exempt from federal income tax. Our records indicate that your organization is currently exempt under section 501(c)(3) of the Internal Revenue Code.

Our records indicate that your organization is also classified as a public charity under sections 509(a)(1) and 170(b)(1)(A)(ii) of the Internal Revenue Code.

Our records indicate that contributions to your organization are deductible under section 170 of the Code, and that you are qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Internal Revenue Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,

Janna K. Skufer

Janna K. Skufca, Director, TE/GE Customer Account Services