

*EXHIBIT 2*

District Director

Internal Revenue Service

Date: In reply refer to:

April 8, 1970 416



Maddox Foundation  
601 Broadway  
Nashville, Tennessee 37203

Gentlemen:

Purpose: Charitable

Accounting Period Ending: December 31

On the basis of the stated purpose of the above-named trust and the understanding that its operations will continue as evidenced to date or will conform to those proposed in the ruling application filed in its behalf, we have concluded that the trust is exempt from Federal income tax as an organization described in section 501(c)(3) of the Internal Revenue Code. Any changes in operations from those described, or in its character or purposes, must be reported immediately to the District Director for consideration of their effect upon its exempt status. You must also report any change in its name or address.

In this letter we are not determining whether you are a private foundation as defined in new section 509(a) of the Code. Your attention is invited to new section 508(b) of the Code which sets forth requirements for establishing that an organization exempt under section 501(c)(3) is not a private foundation. When procedures are developed to implement these new requirements, we will advise you how to proceed to notify the Internal Revenue Service if you do not believe yourself to be a private foundation.

For years beginning prior to January 1, 1970, you are required to file the annual information return, Form 990-A. For each subsequent year, please refer to the instructions accompanying the Form 990-A for that particular year to determine whether you are required to file. If filing is required, you must file the Form 990-A by the 15th day of the fifth month after the end of your annual accounting period.

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T. In this letter we are not determining whether any

Maddox Foundation

of your present or proposed activities are an unrelated trade or business as defined in section 513 of the Code.

You are not liable for Federal Unemployment Taxes. You are liable for Social Security Taxes only if you have filed waiver of exemption certificates as provided in the Federal Insurance Contributions Act.

Contributions made to you are deductible by donors as provided in section 170 of the Code. Bequests, legacies, devises, transfers or gifts to or for your use are deductible for Federal estate and gift tax purposes under the provisions of section 2055, 2106 and 2522 of the Code.

Every exempt organization is required to have an Employer Identification Number, regardless of whether it has any employees. This number should be entered in the designated space on all Federal returns which should be filed with the Mid-Atlantic Service Center in Philadelphia, Pennsylvania, and referred to on all correspondence which should be addressed to the District Director in Atlanta, Georgia. If you do not have such a number, our Service Center will assign one to you in the near future and notify you of the number assigned.

This ruling is based on evidence that your funds are dedicated to the purposes set out in section 501(c)(3) of the Code. To assure your continued exemption, you should maintain records to show that funds are expended only for those purposes. If you distribute funds to other organizations, your records should show whether they are exempt under section 501(c)(3). In cases where the recipient organization is not exempt under section 501(c)(3), there should be positive evidence that the funds remain dedicated to the required purposes and that they will be used for those purposes by the recipient.

This is a determination letter.

Sincerely yours,

*A. C. Ross*

A. C. Ross  
District Director

Form 51-4  
10/87  
P. 214

NOTICE OF EMPLOYER  
IDENTIFICATION NUMBER

Please make a separate  
record of this number for  
use in case the notice  
should be lost or destroyed.

237017790

Maddox Foundation

601 Broadway, Nashville, Tennessee 37203

Davidson

The Identification Number shown above will be used by the Internal Revenue Service to identify your Federal tax returns, and other documents, i.e., 1120, 940, 941, etc., and your payments of the taxes reported on such returns. Your Identification Number should be shown on such returns, documents, and on any related forms or correspondence.