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

Date: JUL 0 8 2016

ROMAN CATHOLIC ARCHBISHOP OF BOSTON A CORPORATION SOLE C/O WILMERHALE AMY A NULL 60 STATE ST BOSTON, MA 02109 Employer Identification Number:

04-2106175

DLN:

170070280888016

Person to Contact:

JOSEPH A CHICK ID# 31365

Contact Telephone Number:

(513) 263-4582

Plan Name:

PENSION PLAN OF THE ROMAN CATHOLIC

ARCHODIOCESE OF BOSTON

Plan Number: 001

Dear Applicant:

Based on the information you provided, we are issuing this favorable determination letter for your plan listed above. However, our favorable determination only applies to the status of your plan under the Internal Revenue Code and is not a determination on the effect of other federal or local statutes. To use this letter as proof of the plan's status, you must keep this letter, the application forms, and all correspondence with us about your application.

Your determination letter does not apply to any qualification changes that become effective, any guidance issued, or any statutes enacted after the dates specified in the Cumulative List of Changes in Plan Requirements (the Cumulative List) for the cycle you submitted your application under, unless the new item was identified in the Cumulative List.

Your plan's continued qualification in its present form will depend on its effect in operation (Section 1.401-1(b)(3) of the Income Tax Regulations). We may review the status of the plan in operation periodically.

You can find more information on favorable determination letters in Publication 794, Favorable Determination Letter, including:

The significance and scope of reliance on this letter,
The effect of any elective determination request in your application
materials,
The reporting requirements for qualified plans, and
Examples of the effect of a plan's operation on its qualified status.

You can get a copy of Publication 794 by visiting our website at www.irs.gov/formspubs or by calling 1-800-TAX-FORM (1-800-829-3676) to request a copy.

This letter considered the 2014 Cumulative List of Changes in Plan Qualification Requirements.

This determination letter applies to the amendments dated on

Letter 5274

ROMAN CATHOLIC ARCHBISHOP OF BOSTON

1/21/16 & 6/1/14.

This determination letter also applies to the amendments dated on 11/16/11.

This determination letter expresses no opinion as to the federal tax consequences of the replacement, or proposed replacement, of any joint and survivor, single life or other annuity being paid with a lump sum payment or other accelerated form of distribution.

If you submitted a Form 2848, Power of Attorney and Declaration of Representative, or Form 8821, Tax Information Authorization, with your application and asked us to send your authorized representative or appointee copies of written communications, we will send a copy of this letter to him or her.

If you have any questions, you can contact the person listed at the top of this letter.

Sincerely

Karen D. Truss

Karen S. Zms

Director, EP Rulings & Agreements

Addendum

ROMAN CATHOLIC ARCHBISHOP OF BOSTON

This determination letter is based solely on your assertion that the plan is entitled to be treated as a church plan under section 414(e) of the Internal Revenue Code.