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Florida Department of State  
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To: Division of Corporations  
Fax Number : (850)617-6383

From: Account Name : MELAND RUSSIN & BUDWICK, P.A.  
Account Number : I20040000113  
Phone : (305)358-6363  
Fax Number : (305)358-1221

\*\*Enter the email address for this business entity to be used for annual report mailings. Enter only one email address please.\*\*

Email Address: \_\_\_\_\_

SECRETARY OF STATE  
TALLAHASSEE, FLORIDA

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FLORIDA LIMITED LIABILITY CO.  
CJS Checkers Orlando, LLC

Certificate of Status	1
Certified Copy	0
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J. SAULSBERRY  
EXAMINER  
MAR 1 2013

ARTICLES OF ORGANIZATION  
OF  
CJS CHECKERS ORLANDO, LLC

ARTICLE I - Name

The name of the company is CJS CHECKERS ORLANDO, LLC, a Florida limited liability company (the "Company").

ARTICLE II - Address

The mailing address and street address of the principal office of the Company

9406 West Broadview Drive  
Bay Harbour Islands, Florida 33154

ARTICLE III - Initial Registered Office and Agent

The name of the initial registered agent of the Company and the street address of the registered office of this Company is:

Meland Russin & Budwick, P.A.  
200 South Biscayne Boulevard  
Suite 3200  
Miami, Florida 33131

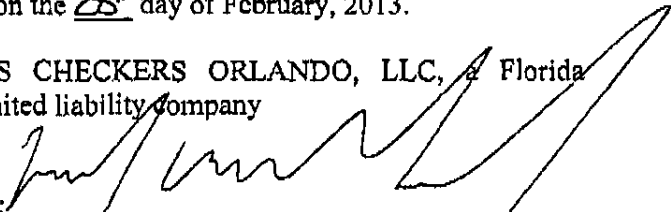
ARTICLE IV - Manager

The initial Manager of the Company is as follows:

JCS Triple Net Holdings, LLC

IN WITNESS WHEREOF, I have hereunto affixed my hand, as an authorized representative of this limited liability company on the 28<sup>th</sup> day of February, 2013.

CJS CHECKERS ORLANDO, LLC, a Florida limited liability company

By:   
Mark S. Meland, as authorized representative

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REGISTERED AGENT/REGISTERED OFFICE

PURSUANT TO THE PROVISIONS OF SECTION 608.415 OR 608.507, FLORIDA STATUTES, THE UNDERSIGNED LIMITED LIABILITY COMPANY, ORGANIZED UNDER THE LAWS OF THE STATE OF FLORIDA, SUBMITS THE FOLLOWING STATEMENT IN DESIGNATING THE REGISTERED OFFICE/REGISTERED AGENT, IN THE STATE OF FLORIDA.

- 1) The name of the Limited Liability Company is:

CJS CHECKERS ORLANDO, LLC,  
a Florida limited liability company

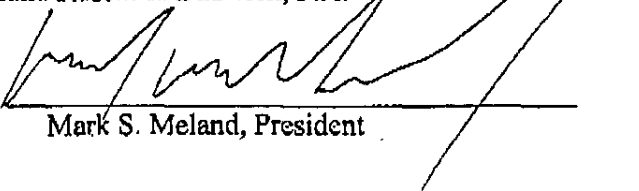
- 2) The name and address of the registered agent and office is:

Meland Russin & Budwick, P.A.  
200 South Biscayne Boulevard  
Suite 3200  
Miami, Florida 33131

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Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the designation as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

Meland Russin & Budwick, P.A.

By:   
Mark S. Meland, President

2/28/13  
Date