

# Certificate of Limited Partnership

A23000000314  
FILED  
June 20, 2023  
Sec. Of State  
msolomon

Name of Limited Partnership:

678 107TH AVENUE NORTH, LTD

Street Address of Limited Partnership:

919 NOTTINGHAM DRIVE  
NAPLES, FL. 34109

Mailing Address of Limited Partnership:

919 NOTTINGHAM DRIVE  
NAPLES, FL. 34109

The name and Florida street address of the registered agent is:

JOHN N BRUGGER  
600 5TH AVENUE S  
SUITE 207  
NAPLES, FL. 34102

I certify that I am familiar with and accept the responsibilities of registered agent.

Registered Agent Signature: JOHN N BRUGGER

The name and address of all general partners are:

Title: G  
DREW JOSEPHSON  
919 NOTTINGHAM DRIVE  
NAPLES, FL. 34109

The effective date for this Limited Partnership shall be:

06/20/2023

Signed this Twentieth day of June, 2023

I (we) declare the I (we) have read the foregoing and know the contents thereof and that the facts stated herein are true and correct.

General Partner Signature: DREW JOSEPHSON

The individual(s) signing this document affirm(s) that the facts stated herein are true and the individual(s) is/are aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

A23000000314

ATTORNEY'S AFFIDAVIT

STATE OF FLORIDA

COUNTY OF COLLIER

BEFORE ME, the undersigned authority, on this 21<sup>st</sup> day of June, 2023, personally appeared JOHN N. BRUGGER, who is to me well known and having been sworn upon oath, deposes and states:

1. My name is JOHN N. BRUGGER, I am over the age of twenty-one (21) years, am otherwise *sui juris*, and have personal knowledge of the facts asserted herein.
2. I am a licensed attorney, Florida Bar #340502, authorized to practice law in Florida and am currently practicing law in the State of Florida. My business address is 600 Fifth Avenue South, Suite 207, Naples, FL 34102. My business telephone number is (239) 263-6000. My business mailing address is 600 Fifth Avenue South, Suite 207, Naples, FL 34102.
3. This Affidavit is given with regard to the filing of a Certificate of Limited Partnership for 678 107<sup>th</sup> Avenue, North, LTD, a Florida limited partnership (the "LTD").
4. The principals involved in the LTD are one and the same as the principals who caused the filing of the Articles of Organization for 678 107<sup>th</sup> Avenue North, LLC, a Florida limited liability company, as Document Number L23000234451 on June 12, 2023 (the "LLC").
5. It is the intent of the principals to acquire and develop real estate with the intent of generating profits.
6. It was recently determined that one of more of the intended principals of the LLC are Canadian citizens and that Canadian law classifies an LLC as a corporation for tax purposes resulting in double taxation of any profits.
7. In order to avoid double taxation of income in Canada, the principals have elected to conduct business in the form of a Florida limited partnership, which would avoid a corporate tax on profits in Canada.
8. The ownership interest in the LLC will be vested in an American principal and the LLC will be designated as the general partner of the LTD,
9. All business activity will be conducted in the LTD.
10. The principals of the LLC have authorized the use of the name 678 107<sup>th</sup> Avenue North, LTD by the Florida limited partnership, of which 678 107<sup>th</sup> Avenue North, LLC shall be the general partner.
11. Affiant further states that the information contained in this Affidavit is true, correct and current as of the date this Affidavit is given.

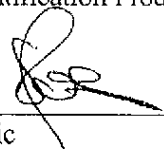
FURTHER AFFIANT SAYETH NAUGHT.

DATED this 21<sup>st</sup> day of June, 2023

  
\_\_\_\_\_  
JOHN N. BRUGGER, ATTORNEY AT LAW

SUBSCRIBED AND SWORN to before me this 21<sup>st</sup> day of June 2023, by JOHN N. BRUGGER,  
who is ☒ personally known to me as \_\_\_\_\_ OR who ☐ produced identification  
\_\_\_\_\_.

Type of Identification Produced \_\_\_\_\_

  
\_\_\_\_\_  
Notary Public  
My Commission Expires:

MARIA ROSE  
\_\_\_\_\_  
Printed, Typed or Stamped Name of Notary



Prepared by: John N. Brugger, Esq.  
Forsyth & Brugger, P.A.  
600 Fifth Avenue South,  
Suite 207  
Naples, FL 34102