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### FLORIDA/FOREIGN LIMITED LIABI

CR Tax Investments I, LLC

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#### ARTICLES OF ORGANIZATION OF <u>CR TAXINVESTMENTS</u> 1, LLC

The undersigned Member or Authorized Representative of a Member signs these Articles of Organization and forms a limited liability company (the "Company") under the Florida Limited Liability Company Act (the "Act"), as follows:

# ARTICLE I.

The name of the Company is: CR Tax Investments I, LLC.

## ARTICLE II. EXISTENCE

The date when the Company's existence will commence is April 7, 2009, in accordance with Section 608.409(1) of the Act.

## ARTICLE III. MAILING ADDRESS AND STREET ADDRESS

The mailing address and street address of the principal office of the Company is: 75 N.E. 6th Avenue, Suite 101, Delray Beach, Florida 33483

## ARTICLE IV. INITIAL REGISTERED OFFICE AND AGENT

The name and street address of the initial registered agent and office of the Company are: David A. Beyer, c/o DLA Piper LLP (US), 100 North Tampa Street, Suite 2200, Tampa, Florida 33602-5809.

Signature of a member or an authorized representative of a member

(In accordance with Section 608.408(3) of the Act, the execution of this document constitutes an affirmation under the penalties of perjury that the facts stated herein are true.)

David A. Bever

(Typed or printed name of signee)

#### ACCEPTANCE BY REGISTERED AGENT

Having been named as registered agent and to accept service of process for the above stated limited liability company at the place designated in these Articles, I accept the appointment as registered agent of the Company 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 as provided for in the Act.

David A. Beyer