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## Rahul Aggarwal (Manager) Aahi Enterprises, LLC

1227 Egret Circle South, Jupiter FL 33458 [ 561-319-3771 [ rvaggarwal@hotmail.com

#### 11/26/2017

Florida Dept of State Registration Section Division of Corporations P.O. Box 6327 Tallahassee, FL 32314

#### Dear Florida Dept of State:

I am filing an amendment to the Articles of Organization for Aahi Enterprises, LLC. The amendment is to comply with the new IRS Partnership Representative rules under the Bipartisan Budget Act of 2015.

Sincerely,

Rahul Aggarwal

#### **COVER LETTER**

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SUBJECT:	Aahi Enterprises, LLC					
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The enclosed	f Articles of	Amendment and fee(s) are sub	mitted for filing.			
Please-return	all correspo	ndence concerning this matter	to the following:			
		Rahul Aggarwal				
		· · · · · · · · · · · · · · · · · · ·	Name of Person			
		Aahi Enterprises, LLC				
			Firm/Company			
		1227 Egret Circle South				
			Address			
		Jupiter, FL 33458				
		rvaggarwal@hotmail.com	City/State and Zip Code			
		E-mail address: (	to he used for future annual report notifi	cation)		
For further in	iformation co	oncerning this matter, please co	all:			
Rahul Aggar	rwal		561 319-3771			
	Name of	Person	Area Code Daytime	Telephone Number		
Enclosed is a	check for th	e following amount:				
■ \$25.00 F	iling Fee	☐ \$30.00 Filing Fee & Certificate of Status	☐ \$55.00 Filing Fee & Certified Copy (additional copy is enclosed)	☐ \$60.00 Filing Fee, Certificate of Status & Certified Copy (additional copy is enclosed)		

MAILING ADDRESS: Registration Section Division of Corporations P.O. Box 6327 Tallahassee, FL 32314 STREET/COURIER ADDRESS:

Registration Section
Division of Corporations
Clifton Building
2661 Executive Center Circle
Tallahassee, Ft. 32301

### ARTICLES OF AMENDMENT TO ARTICLES OF ORGANIZATION OF

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SECRETA:	PA 2:40  HOF STATE EE. FLORID:
""ASS	ÉE, FLORIO

Aahi Enterprises, LLC

(Name of the Limited Liability Company as it now appears on our records.)
(A Florida Limited Liability Company)

The Articles of Organization for this Limited Liability Company were filed on Inne 29, 2010 and assigned Florida document number L10000069193  This amendment is submitted to amend the following:  A. If amending name, enter the new name of the limited liability company here:  The new name must be distinguishable and contain the words "Limited Liability Company," the designation "L.L.C." or the abbreviation "L.L.C."  Enter new principal offices address, if applicable:  (Principal office address MUST BE A STREET ADDRESS)  Enter new mailing address, if applicable:  (Mailing address MAY BE A POST OFFICE BOX)  B. If amending the registered agent and/or registered office address on our records, enter the name of the	(A Florida Lin	nited Liability Company)	MASSEE. FLORIDA
Enter new mailing address, if applicable:  (Mailing address MAY BE A POST OFFICE BOX)  B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address	The Articles of Organization for this Limited Liability Com	pany were filed on June 29, 2010	
A. If amending name, enter the new name of the limited liability company here:  The new name must be distinguishable and contain the words "Limited Liability Company," the designation "LLC" or the abbreviation "LLC."  Enter new principal offices address, if applicable:  (Principal office address MUST BE A STREET ADDRESS)  Enter new mailing address, if applicable:  (Mailing address MAY BE A POST OFFICE BOX)  B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address	Florida document number L10000069193		
The new name must be distinguishable and contain the words "Limited Liability Company," the designation "L.C." or the abbreviation "L.L.C."  Enter new principal offices address, if applicable:  (Principal office address MUST BE A STREET ADDRESS)  Enter new mailing address, if applicable:  (Mailing address MAY BE A POST OFFICE BOX)  B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent:  New Registered Office Address:  Enter Florada street address	This amendment is submitted to amend the following:		
Enter new principal offices address, if applicable:  (Principal office address MUST BE A STREET ADDRESS)  Enter new mailing address, if applicable:  (Mailing address MAY BE A POST OFFICE BOX)  B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address	A. If amending name, enter the new name of the limited	liability company here:	
(Principal office address MUST BE A STREET ADDRESS)  Enter new mailing address, if applicable: (Mailing address MAY BE A POST OFFICE BOX)  B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent: New Registered Office Address:  Enter Florida street address	The new name must be distinguishable and contain the words "Limited	Liability Company," the designation "LLC"	or the abbreviation "L.L.C."
Enter new mailing address, if applicable:  (Mailing address MAY BE A POST OFFICE BOX)  B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address	Enter new principal offices address, if applicable:		
B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address	(Principal office address MUST BE A STREET ADDRES	<u></u>	
B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address			
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B. If amending the registered agent and/or registered office address on our records, enter the name of the registered agent and/or the new registered office address here:  Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address	••	<del></del>	
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Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address			
Name of New Registered Agent:  New Registered Office Address:  Enter Florida street address	B. If amending the registered agent and/or registered	ed office address on our records,	enter the name of the no
New Registered Office Address:  Enter Florida street address	registered agent and/or the new registered ornce address	s nere:	
Enter Florida street address	Name of New Registered Agent:	_	
Enter Florida street address	New Registered Office Address		
	New Registered Office Address.	Enter Florida street address	
City Zip Code		, Florida	
		City	Zip Code
	l hereby accept the appointment as registered agent and	agree to act in this capacity. I furt	ther agree to comply with i

I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relative 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 Chapter 605, F.S. Or, if this document is being filed to merely reflect a change in the registered office address, I hereby confirm that the limited liability company has been notified in writing of this change.

If Changing Registered Agent, Signature of New Registered Agent

If amending Authorized Person(s) authorized to manage, enter the title, name, and address of each person being added or removed from our records:

MGR = Manager AMBR = Authorized Member		Address Section Sectio		
<u>Title</u>	<u>Name</u>	Address SECRETARY 25	Type of Action	
		SECRETARY OF STATE TALLAHASSEE, FLORIDA	□ Add	
			Aemove	
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			Remove	
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			Change	

Amending Article 3: addition of a Section 3:11	
see attached document for details of Section 3.11	· LED
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	TALLAHASSEE, FLORID
	ALLAHASSEE STATE
ffective date, if other than the date of filing:	(optional)
an effective date is listed, the date must be specific and cannot be prior to date of fili Note: If the date inserted in this block does not meet the applicable statuto:	
ocument's effective date on the Department of State's records.	
e record specifies a delayed effective date, but not an effec	tive time, at 12:01 a.m. on the earlier of:
The 90th day after the record is filed.	
Pated Nov 26 2017  Signature of a pheroper or authorized representations and appearance of authorized representations and authorized representations and authorized representations are appearance of authorized representation and authorized representations are appearance of authorized representation and authorized representations are appearance of authorized representation and authorized rep	
ated	
Ralul Masawa	
Signature of a sheroper or authorized repres	entative of a member
Rahul Aggarwal  Typed or printed name of si	

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#### 3.11 Partnership Representative

This Section 3.11 shall apply for tax years ending after December 31, 2017.

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SECRETARY DESMITE 3.11.1 For purposes of this Section 1, unless otherwise specified, all references the Code shall be to such provisions as enacted by the Bipartisan Budget Act of 2015 as such URIDA provisions may subsequently be modified.

- 3.11.2 The Manager shall be the Company's designated "partnership representative" within the meaning of Code Section 6223 (the "Tax Representative") with sole authority to act on behalf of the Company for purposes of Subchapter C of Chapter 63 of the Code and any comparable provisions of state or local income tax laws.
- 3.11.3 If the Company qualifies to elect pursuant to Code Section 6221(b) (or successor provision) to have Subchapter C of Chapter 63 of the Code not apply to any federal income tax audits and other proceedings, the Manager shall cause the Company to make such election.[4]
- 3.11.4 If any "partnership adjustment" (as defined in Code Section 6241(2)) is determined with respect to the Company, the Tax Representative shall promptly notify the Members upon the receipt of a notice of final partnership adjustment, and shall take such actions as directed by a majority of the Members in writing within 10 business days after the receipt of such notice, including whether to file a petition in Tax Court, cause the Company to pay the amount of any such adjustment under Code Section 6225, or make the election under Code Section 6226.[5]
- 3.11.5 If any "partnership adjustment" (as defined in Code Section 6241(2)) is finally determined with respect to the Company and the Tax Representative has not caused the Company to make the election under Code Section 6226, then (i) the Members shall take such actions requested by the Tax Representative, including filing amended tax returns and paying any tax due in accordance with Code Section 6225(c)(2); (ii) the Tax Representative shall use commercially reasonable efforts to make any modifications available under Code Section 6225(c)(3), (4) and (5), and (iii) any "imputed underpayment" (as determined in accordance with Code Section 6225) or partnership adjustment that does not give rise to an imputed underpayment shall be apportioned among the Members of the Company for the taxable year in which the adjustment is finalized in such manner as may be necessary (as determined by the Tax Representative in good faith) so that, to the maximum extent possible, the tax and economic consequences of the partnership adjustment and any associated interest and penalties are borne by the Members based upon their interests in the Company for the reviewed year.
- 3.11.6 If any subsidiary of the Company (i) pays any partnership adjustment under Code Section 6225; (ii) requires the Company to file an amended tax return and pay associated taxes to reduce the amount of a partnership adjustment imposed on the subsidiary, or (iii) makes an election under Code Section 6226, the Tax Representative shall cause the Company to make the administrative adjustment request provided for in Code Section 6227 consistent with the principles and limitations set forth in Sections 1(d)-(e) above for partnership adjustments of the Company, and the Members shall take such actions reasonably requested by the Tax

Representative in furtherance of such administrative adjustment request.

3.11.7 The obligations of each Member or former Member under this Section 1 shall survive the transfer or redemption by such Member of its Membership Interest and the termination of this Agreement or the dissolution of the Company.

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