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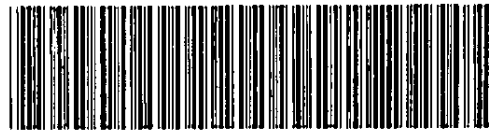
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NAME: BP TAX ADVISORY LLC

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ARTICLES OF ORGANIZATION

Article I. Name

The name of this Florida Limited Liability Company is:

BP TAX ADVISORY LLC

Article II. Address

The Company's street and mailing address is:

Dr. Luis Bonavita 1294 of 1202,
WTC FZ, Montevideo, Uruguay

Article III. Registered Agent

The name and Street Address of the Company's registered agent is:

MELPAK, INC.
13727 152 STREET #501
MIAMI, FL 33177

Article IV. Transferability of Membership Interests

No members shall have the right to assign their membership interests in the Company without the written agreement of all of the membership interests, unless otherwise provided in the Company's Operating Agreement. If the assignment is not approved by all of the membership interests, the assignee shall have no right to become a member, to participate in the management of the Company, or to exercise any other rights or powers of a member. The assignee shall merely be entitled to receive the share of profits and other distributions and the allocation of income, gain, loss deduction, credit or similar item to which the assignor was entitled, to the extent assigned.

American Incorporators Ltd.
1013 Centre Rd., Suite 403-A
Wilmington, DE 19805

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Article V. Management

The name of the member is:

VINEGIA S.A.

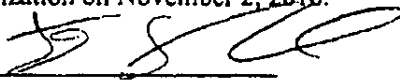
The name of the manager is:

Bruno Gil Peixoto

Article VI. Company Existence

The Company's existence shall begin effective as of November 2, 2016.

The undersigned authorized representative of a member executed these Articles of Organization on November 2, 2016.



Jeff Tindall
Authorized Representative

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**CERTIFICATE OF DESIGNATION
REGISTERED AGENT/OFFICE**

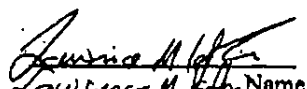
LIMITED LIABILITY COMPANY:

BP TAX ADVISORY LLC

REGISTERED AGENT/OFFICE

MELPAK, INC.
13727 152 STREET #501
MIAMI, FL 33177

I agree to act as registered agent to accept service of process for the
Limited Liability Company named above at the place designated in this Certificate.
I agree to comply with the provisions for all statutes relating to the
proper and complete performance of the registered agent duties. I am
familiar with and accept the obligations of the registered agent position.


Lawrence M. Kohn Name
Date: November 2, 2016

American Incorporators Ltd.
1013 Centre Rd., Suite 403-A
Wilmington, DE 19805
800-421-2661