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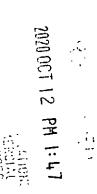
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# FLORIDA LIMITED LIABILITY CO.

Capco Opportunity Zone Fund, LLC

Certificate of Status	0
Certified Copy	1
Page Count	02
Estimated Charge	\$155.00



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#### ARTICLES OF ORGANIZATION

**OF** 

### CAPCO OPPORTUNITY ZONE FUND, LLC

The undersigned executes these Articles of Organization of Capeo Opportunity Zone Fund, LLC to form a limited liability company pursuant to the Florida Revised Limited Liability Company Act:

## ARTICLE I. NAME

The name of the limited liability company is Capeo Opportunity Zone Fund, LLC.

#### **ARTICLE II. ADDRESS**

The mailing and street address of the principal office of the limited liability company is 1320 E. 9th Ave., 2nd Floor, Tampa, FL 33605.

## ARTICLE III. REGISTERED AGENT AND OFFICE

The street address of the initial registered office of the limited liability company is 101 E. Kennedy Blvd, Suite 3700, Tampa, FL 33602, and the name of the limited liability company's initial registered agent at that address is Jonathan P. Jennewein.

Having been named to accept service of process for the above stated limited liability company at the place designated in this certificate, 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 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.

/s/ Jonathan P. Jennewein
Jonathan P. Jennewein

## **ARTICLE IV. MANAGEMENT OF COMPANY**

The limited liability company is a manager-managed limited liability company-

## ARTICLE V. PURPOSE

The purpose of the limited liability company is to invest as a member in Ybor Apartments, LLC and to engage in other activities incidental or related thereto. The members of the limited liability company intend to cause it to qualify as a "qualified opportunity fund" and to cause Ybor Apartments, LLC to meet the requirements for a "qualified opportunity zone business" (each as defined in Section 1400Z-2 of the Internal Revenue Code of 1986, as amended). In addition to the foregoing, the limited liability company may engage in any other business permitted under

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applicable law so long as such activities continue to permit the limited liability company to qualify as a "qualified opportunity fund."

EXECUTED: October 12, 2020 /s/ Jonathan P. Jennewein

Jonathan P. Jennewein,

Authorized Representative of Member