

N1500000 9554

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

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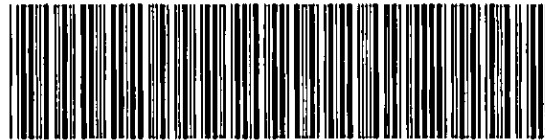
(Business Entity Name)

(Document Number)

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R. WHITE  
SEP 10 2018

2018 SEP -5 PM 1:04  
SECRETARY OF STATE  
TALLAHASSEE, FL

FILED

**COVER LETTER**

**TO:** Amendment Section  
Division of Corporations

**NAME OF CORPORATION:**

CHAMPIONSHIP ACADEMY OF DISTINCTION AT DAVIE HIGH  
SCHOOL, INC.

**DOCUMENT NUMBER:**

NI5000009554

The enclosed *Articles of Amendment* and fee are submitted for filing.

Please return all correspondence concerning this matter to the following:

ROBERT WALKER CPA

(Name of Contact Person)

ROBERT WALKER CPA

(Firm/ Company)

2803 w. BUSCH BLVD. STE 106

(Address)

TAMPA, FL 33618

(City/ State/ and Zip Code)

For further information concerning this matter, please call:

ROBERT WALKER CPA

(Name of Contact Person)

813-892-4274

(Area Code & Daytime Telephone Number)

Enclosed is a check for the following amount:



\$35.00 Filing Fee



\$43.75 Filing Fee &  
Certificate of Status



\$43.75 Filing Fee &  
Certified Copy  
(Additional copy is  
enclosed)



\$52.50 Filing Fee  
Certificate of Status  
Certified Copy  
(Additional Copy  
is enclosed)

**Mailing Address**

Amendment Section  
Division of Corporations  
P.O. Box 6327  
Tallahassee, FL 32314

**Street Address**

Amendment Section  
Division of Corporations  
409 E. Gaines Street  
Tallahassee, FL 32314

Articles of Amendment  
to  
Articles of Incorporation  
of

**FILED**

2018 SEP -5 PM 1:04

SECRETARY OF STATE  
TALLAHASSEE, FL

**NAME OF CORPORATION:**

CHAMPIONSHIP ACADEMY OF DISTINCTION AT DAVIE HIGH  
SCHOOL, INC.

**DOCUMENT NUMBER:**

N15000009554

Pursuant to the provisions of section 617.1006, Florida Statutes, this Florida Not For Profit Corporation adopts the following amendment(s) to its Articles of Incorporation:

**AMENDMENTS ADOPTED:**

**ARTICLE X**

**ADDITIONAL PROVISIONS REQUIRED TO BE EXEMPT FROM FEDERAL INCOME TAX**

This nonprofit corporation is organized exclusively for charitable, religious, educational, and scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations that qualify as exempt organizations under section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code.

No part of the net earnings of this nonprofit corporation shall inure to the benefit of, or be distributable to its members, trustees, officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in the purpose clause hereof. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the organization shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of any candidate for public office. Notwithstanding any other provision of this document, the organization shall not carry on any other activities not permitted to be carried on (a) by an organization exempt from federal income tax under section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or (b) by an organization, contributions to which are deductible under section 170 (c) (2) of the Internal Revenue Code, or corresponding section of any future federal tax code.

Upon dissolution of this corporation, assets shall be distributed for one or more exempt purposes within the meaning of section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not disposed of shall be disposed of by the Court of Common Pleas of the county in which the principal office of the corporation is then located, exclusively for such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.

The date of adoption of the amendments was: August 10, 2018

**Adoption of Amendments**

There were no members or members entitled to vote on the amendments. The amendments were adopted by the board of directors.

Signed this 10th day of August, 2018.

Signature:



Print Name:

Melissa Bustamante

Title:

Vice President



Department of the Treasury  
Internal Revenue Service  
Tax Exempt and Government Entities  
PO Box 2508  
Cincinnati, OH 45201

ROBERT WALKER CPA  
2803 W BUSH BLVD STE 106  
TAMPA, FL 33618

**RE: CHAMPIONSHIP ACADEMY OF DISTINCTION AT  
DAVIE HIGH SCHOOL INC**

**Date:**

August 7, 2018

**Employer ID number:**

81-2749877

**Person to contact / ID number:**

Mrs. Hein

ID# 0203179

**Contact telephone number:**

513-975-6402

**Contact fax number:**

855-349-2188

**Response due date:**

September 4, 2018

Dear Applicant:

**Why you are receiving this letter**

We need more information to consider your determination letter request.

**What you must do**

Please provide the information requested and follow the submission instructions. You must submit your response by the due date above.

**If you don't respond**

If you don't respond to the Information Request by the due date, or don't provide all the requested information, we may close your case without making a determination. If so, we won't refund any user fee you paid, and you'll need to submit a new request and any applicable user fee payment if you want us to reconsider your request. Alternatively, if you haven't established that you meet the requirements for exemption for the subsection requested, we may make an adverse determination.

In addition, if you don't provide the requested information by the due date, you may lose your rights to get a declaratory judgment. Under Internal Revenue Code (IRC) Section 7428(b)(2), you must exhaust all administrative remedies available to you within the IRS before a court will issue a declaratory judgment about your exempt status. This requirement means you must take all reasonable steps in a timely manner to secure a determination under IRS procedures, including providing the information we need to act on your request. If you fail to timely provide the requested information, you may lose your rights to obtain a declaratory judgment under Section 7428.

**Additional information**

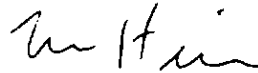
If you have questions or need additional time to respond, call me at the number at the top of this letter. If you have concerns after speaking with me, you can call my supervisor Janine Estes at 513-975-6233.

Championship Academy of Distinction at Davie High School, Inc.  
81-2749877

The Taxpayer Advocate Service (TAS) is an independent organization within the IRS that can help protect your taxpayer rights. TAS can offer you help if your tax problem is causing a hardship or you've tried but haven't been able to resolve your problem with the IRS. If you qualify for TAS assistance, which is always free, TAS will do everything possible to help you. Visit [taxpayeradvocate.irs.gov](http://taxpayeradvocate.irs.gov) or call 1-877-777-4778.

We sent a copy of this letter to your representative as indicated in your power of attorney.

Sincerely,



Mrs. Hein  
Exempt Organizations Specialist

Enclosure:  
Information Request

## Information Request First Request

### Information we need to make our determination

1. Your organizing document does not meet the organizational test of IRC Section 501(c)(3). To meet these requirements, you must amend your organizing document to include adequate purpose and dissolution clauses then sign below to verify you completed the amendment. The following is an example of acceptable purpose and dissolution clauses:

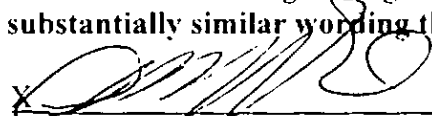
**Said organization is organized exclusively for charitable, religious, educational, and scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations described under Section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code.**

**Upon the dissolution of the organization, assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not disposed of shall be disposed of by a court of competent jurisdiction in the county in which the principal office of the organization is then located, exclusively for such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.**

See page 7 of the *Instructions for Form 1023* at [www.irs.gov](http://www.irs.gov) for more details and examples of specific language that meets the requirements. A corporation must file an amendment with the appropriate state agency.

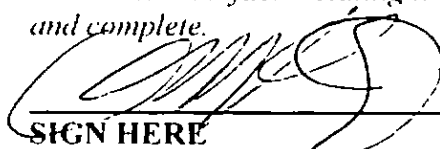
Note: You don't need to submit a copy of your amendment.

**We amended our organizing document as indicated to include the above provisions or other substantially similar wording that meets the requirements of Section 501(c)(3).**

  
\_\_\_\_\_  
**SIGN HERE**

2. Include the following declaration with your response, signed and dated by an officer, director, trustee, or other governing body member (not an authorized representative). You can sign and date the statement below or reproduce it in the body of your signed response. The declaration must accompany responses per Revenue Procedure 2018-5.

*Under penalties of perjury, I declare that I have examined this information, including accompanying documents, and, to the best of my knowledge and belief, the information contains all the relevant facts relating to the request for the information, and such facts are true, correct, and complete.*

  
\_\_\_\_\_  
**SIGN HERE**

8/31/18  
**Date**

Championship Academy of Distinction at Davie High School, Inc.  
81-2749877

### How to submit the requested information (do's and don'ts)

- **Don't include** any personal identifying information like bank account or social security numbers that could result in identity theft or other adverse consequences if publicly disclosed. If we approve your application for exemption, we're generally required by law to make the application and the information you submit in response to this letter available for public inspection. If you have questions about the public inspection of your request or other documents, please call me.
- **Do include** the following declaration with your response, signed by one of your principal officers or directors:

**Under penalties of perjury, I declare that I have examined this request, or this modification to the request, including accompanying documents, and to the best of my knowledge and belief, the request or modification contains all the relevant facts relating to the request, and such facts are true, correct, and complete.**

- **Do attach** a copy of the cover letter to your response. This enables us to quickly and accurately associate your response with your case file.
- **Do fax or mail** your response to:

**Fax:**

855-849-2188  
ATT: Mrs. Hein  
Room 4511  
Group 7827

**US Mail:**

Internal Revenue Service  
Exempt Organizations  
P. O. Box 2508  
Cincinnati, OH 45201  
ATT: Mrs. Hein  
Room 4511  
Group 7827

**Street Address (delivery service):**

Internal Revenue Service  
Exempt Organizations  
550 Main Street  
Cincinnati, OH 45202  
ATT: Mrs. Hein  
Room 4511  
Group 7827

- **Don't provide** multiple copies of your response. Providing more than a single response may result in unnecessary delays in processing your response. We must process, assign, and review each piece of correspondence submitted (whether fax or mail).
- **Do allow** adequate processing time if you want to call to verify we received your response. If you fax your response, allow a minimum of three workdays from the day you fax it. If you mail your response, allow a minimum of seven workdays from the day you mail it.