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ACCOUNT NO.	:	12000000	0195
REFERENCE	:	766247	4375876
AUTHORIZATION	:	(ANA)	Jene .
COST LIMIT	:	\$ 70.00	- Marine

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ORDER DATE : August 14, 2017

ORDER TIME : 3:42 PM

ORDER NO. : 766247-005

CUSTOMER NO: 4375876

DOMESTIC FILING

NAME: DRS. KIRAN & PALLAVI PATEL 2017 FAMILY FOUNDATION, INC.

EFFECTIVE DATE:

 XX
 ARTICLES OF INCORPORATION

 CERTIFICATE OF LIMITED PARTNERSHIP

 ARTICLES OF ORGANIZATION

PLEASE RETURN THE FOLLOWING AS PROOF OF FILING:

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- _____ CERTIFICATE OF GOOD STANDING

CONTACT PERSON: Melissa Zender - EXT.

EXAMINER'S INITIALS:

ARTICLES OF INCORPORATION

OF

DRS. KIRAN & PALLAVI PATEL 2017 FAMILY FOUNDATION, INC.

The undersigned natural person of the age of eighteen (18) years or more, for the purpose of forming a corporation under the Florida Not For Profit Corporation Act, hereby adopts the following Articles of Incorporation:

ARTICLE I: NAME OF CORPORATION

The name of the Corporation is DRS. KIRAN & PALLAVI PATEL 2017 FAMILY FOUNDATION, Inc. (the "Corporation"). The principal place of business and mailing address of the corporation is 5600 Mariner Street, Tampa, Florida 33609.

ARTICLE II: DURATION

The duration of the Corporation is perpetual.

ARTICLE III: REGISTERED AGENT AND OFFICE

The name of the Corporation's initial registered agent, and the address of the Corporation's registered office in the state of Florida is:

Rupesh R. Shah 5600 Mariner Street Tampa, Florida 33609

ARTICLE IV: MEMBERS

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The Corporation shall not have members.

ARTICLE V: INCORPORATOR

The name and address of the incorporator is:

Dr. Kiran C. Patel 5600 Mariner Street Tampa, Florida 33609

ARTICLE VI: DIRECTORS

The initial Board of Directors shall be seven (7) in number. The names and addresses of the initial Directors are:

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Dr. Kiran C. Patel 5600 Mariner Street Tampa, Florida 33609

Dr. Pallavi K. Patel 5600 Mariner Street Tampa, Florida 33609

Dr. Sheetal K. Patel 520 S. Armenia Ave., Unit 1239E Tampa, Florida 33609

Dr. Sonali K. Judd 4728 N. Habana Ave., Suite 202 Tampa, Florida 33614

Shilen Patel 5509 W. Gray Street, Suite 200 Tampa, Florida 33609

Rupesh Shah 5600 Mariner Street Tampa, Florida 33609

Hitesh John Adhia 1408 North Westshore Boulevard Tampa, Florida 33607

Directors shall be elected, serve, and be removed as further provided in the Corporation's Bylaws.

ARTICLE VII: CORPORATION'S PURPOSES

The purposes for which the Corporation is organized are as follows:

A. The Corporation is organized and is to be operated exclusively for charitable purposes, including the conduct of activities that qualify as exempt under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended, or the corresponding provision of any future United States Internal Revenue Law (the "Code") and the receiving of gifts and grants and the making of distributions thereof for charitable purposes (hereinafter

4942(g)(4)(A)(i) or (ii) of the Code) by reason of Treasury Regulation Sections 53.4942(a)-3(a)(6) and 53.4945-5(a)(5); or (ii) such organization is a foreign government, or any agency or instrumentality thereof, or an international organization designated as such by Executive order under 22 USC 288, even if it is not described in section 501(c)(3), provided that any grant to such an organization must be made exclusively for charitable purposes as described in Code Section 170(c)(2)(B).

(d) Distributions to Non-Charitable Organizations in Limited Circumstances. An organization which is not described or treated as described in Section 501(c)(3) of the Code also shall be considered as a "charitable organization" for purposes of distributions made by the Corporation, but only if such distributions are made in compliance with applicable provisions of the Code, including, without limitation, the following: (i) requiring that distributions to said organizations be for exclusively charitable purposes, and (ii) meeting the expenditure responsibility requirements of Sections 4945(d) and (h) of the Code (and the Regulations issued under said Code Sections) and the requirements of Treasury Regulation Section 53.4945-6(c).

B. Notwithstanding anything herein to the contrary:

1. No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation except as may be permitted by Section 501(h) of the Code, and the Corporation shall not participate in, or intervene in (including the publishing or distribution of statements), any political campaign on behalf of or in opposition to any candidate for public office.

2. The Corporation shall not carry on any activities not permitted to be carried on by (a) a corporation exempt from the Federal income tax under Section 501(c)(3) of the Code, and (b) by a corporation, contributions to which are deductible under Section 170(c)(2) of the Code, and (c) by a corporation organized under the Florida Not For Profit Corporation Act as now existing or hereafter amended.

3. No part of the net earnings of this Corporation shall inure or be payable to or for the benefit of any private individual or shareholder as defined by Treas. Reg. Section 1.501(a)-1(c), provided that the Board of Directors shall be entitled to reimbursement from the Corporation for reasonable and necessary expenses incurred in the performance of their duties as such.

4. No gift, bequest, devise, or other transfer of any property shall be received or accepted if it is conditioned or limited in a manner (a) as to require a disposition of the income or its principal to any person or organization other than a charitable organization or for other than charitable purposes, or (b) as shall in the opinion of the Board of Directors, jeopardize the federal income tax exemption of the Corporation pursuant to Section 501(c)(3) of the Code.

5. The Board of Directors shall not exercise any power conferred upon them under the provisions hereof in a manner that jeopardizes the federal income taxation of the

Corporation under Section 501(c)(3) of the Code; and, (ii) for as long as the Corporation is classified as a private foundation within the meaning of Section 509 of the Code, the Board of Directors shall: (a) distribute the assets of the Corporation for each taxable year at such time and in such manner as to avoid liability for the tax on undistributed net income imposed by Section 4942 of the Code; (b) not engage in any act of self-dealing as defined in Section 4941(d) of the Code; (c) not retain any excess business holdings as defined in Section 4943(c) of the Code; (d) not make any taxable expenditures as defined in Section 4945(d) of the Code; and (e) not make any investments in such manner as to incur tax liability under Section 4944 of the Code.

C. Subject to the foregoing, the Corporation may engage in any lawful, charitable activity for which corporations may be organized under the Florida Not For Profit Corporation Act.

ARTICLE VIII: GIFTS SUBJECT TO RESTRICTIONS OR CONDITIONS

In accomplishing the charitable purposes of the Corporation, as set forth in Article VII of these Articles of Incorporation, the Corporation may, in its discretion, seek, accept, and administer contributions from a range of potential donors; to accumulate and maintain such contributions in one or more funds, and to distribute the income and/or principal from such funds and from the Corporation's other assets to or on behalf of charitable organizations, to accomplish the Corporation's charitable purposes. With respect to any gift to the Corporation that is subject to restrictions or conditions, the Corporation shall have all of the powers conferred upon it by the Florida Not For Profit Corporation Act and all of the powers set forth in this Article VIII. The enumeration of specific powers in this Article VIII shall not be construed to limit or be in derogation of such statutory powers: provided, however, that none of the powers of the Corporation shall be exercised to carry on activities which are not in themselves in furtherance of the purposes of an organization exempt from Federal income tax under Section 501(c)(3) of the Code, and described in Section 509(a) of the Code, and contributions to which are deductible for income, gift, and estate tax purposes.

A. Without in any way limiting the generality of the foregoing, the Corporation shall have, with respect to every gift and bequest received, the following powers, to be exercised in the best interests of the Corporation, and which in all cases shall be interpreted to comply with Treasury Regulation § 1.170A-9(f)(11)(ii) through (vi) (or the corresponding provisions of any successor regulations thereto) so that all funds meeting the requirements of Treasury Regulation §1.170A-9(f)(11)(ii) (or any successor provision) shall be treated as component parts hereof:

(1) to modify any restriction or condition on the distribution of funds for any specified charitable purposes or to specified organizations if in the sole judgment of the governing body (without the necessity of the approval of any participating trustee, custodian, or agent), such restriction or condition becomes, in effect, unnecessary, incapable of fulfillment, or inconsistent with the charitable needs of the community or area served;

(2) to replace any participating trustee, custodian, or agent for breach of fiduciary duty under Florida law; and

(3) to replace any participating trustee, custodian, or agent for failure to produce a reasonable (as determined by the governing body) return of net income (within the meaning of Treasury Regulation § 1.170A-9(f)(11)(v)(F) (or the corresponding provisions of any successor regulations thereto) over a reasonable period of time (as determined by the Board of Directors of the Corporation).

B. The Corporation also shall have the power to employ (or discharge) one or more investment advisors, brokerage firms or others as the Corporation may select, as agent or in another capacity, to hold, manage, invest and reinvest each and every gift and bequest received by it, and may distribute such amounts, whether from income or principal, to such one or more charitable organizations, institutions, or agencies, in such manner and at such times as the Board of Directors of the Corporation shall from time to time determine as shall be consistent with the provisions of Article VII hereof.

C. Any other provisions notwithstanding in these Articles or any instrument of transfer, the determination as to whether there is a reasonable return of net income with respect to the exercise of the power described above may be made separately with respect to each restricted trust or fund and may be made in the aggregate with respect to unrestricted trusts or funds of the Corporation. In the discretion of the Board of Directors of the Corporation. The Board of Directors shall obtain information and take other appropriate steps with the view to seeing that each participating trustee, custodian, or agent, with respect to each restricted trust or fund that is, and with respect to the aggregate of the unrestricted trusts or funds that are, a component part of the Corporation, administers such trust or fund in accordance with the terms of the Corporation's Articles of Incorporation and accepted standards of fiduciary conduct to produce a reasonable return of net income (or appreciation where not inconsistent with the Corporation's need for current income), with due regard to safety of principal, in furtherance of the exempt purposes of the Corporation (except for assets held for the active conduct of the Corporation's exempt activities).

D. For purposes of this Article VIII, any income that has been designated by the donor of the gift or bequest to which such income is attributable as being available only for the use or benefit of a broad charitable purpose, such as the encouragement of higher education or the promotion of better health care in the community, will be treated as unrestricted. However, any income that has been designated for the use or benefit of a named charitable organization or agency or for the use or benefit of a particular class of charitable organizations or agencies, the members of which are readily ascertainable and are less than five in number, will be treated as restricted.

E. If it appears that there may be grounds for exercising the power described in subparagraphs (2) or (3) of paragraph A of this Article VIII with respect to any fund or trust, the Board of Directors shall notify the participating trustee, custodian or agent involved and provide a reasonable opportunity for explanation and/or correction. Before exercising the powers granted to the Board of Directors under subparagraphs (2) or (3) of paragraph A of this Article VIII, the Board may seek advice of legal counsel as to whether a breach or failure has been committed under the laws of the State of Florida. The Board shall exercise a power described in subparagraphs (2) or (3) of paragraph A of this Article VIII only upon the vote of a majority of the Board of Directors. Upon the exercise of the foregoing power to replace any participating trustee, custodian or agent, the Board of Directors shall have the power, subject to the approval of any applicable court, when required, to

select a successor trustee, custodian or agent to which the fund or funds held by the former trustee, custodian or agent shall be transferred.

F. The Corporation shall have the power to accept gifts, subject to such restrictions as the Board of Directors may determine to be reasonable and not inconsistent with the purposes of the Corporation, including requirements that a portion of the income or principal of such gift be used outside the Corporation's metropolitan area as now or hereafter constituted, provided that:

(1) no such restriction or condition shall constitute, directly or indirectly, any material restriction or condition within the meaning of Treasury Regulation § 1.507-2(a)(7) (or any successor provisions);

(2) all funds accepted by the Corporation shall be subject to its Articles of Incorporation and Bylaws; and

(3) the Board of Directors or a committee empowered by the Board shall be responsible for directing or, in the case of a fund designated for specified beneficiaries, monitoring, the distribution of all of the funds exclusively for charitable purposes (within the meaning of section 170(c)(1) or section 170(c)(2)(B) of the Code).

G. The Corporation shall prepare periodic financial reports treating all of the funds which are held by the Corporation, either directly or in component parts, as funds of the Corporation.

ARTICLE IX: INDEMNIFICATION; INSURANCE

A. The Corporation shall indemnify any person who is or was a Director, Officer, employee, volunteer or agent of the Corporation or is or was serving at the request of the Corporation as a director, officer, partner, trustee, employee, volunteer, or agent of another foreign or domestic business or nonprofit corporation, partnership, joint venture, trust, employee benefit plan, or other enterprise against any liability asserted against him or her or incurred by him or her in such capacity or arising out of his or her status as such, to the full extent, under the circumstances permitted by and pursuant to the procedures specified by the Florida Not For Profit Corporation Act, as in effect and applicable from time to time; provided, however, that, unless required by law, (i) the Corporation shall have no obligation to pay any amounts hereunder with respect to any settlement to which it has not previously agreed in writing and (ii) the Corporation shall not provide any indemnification for taxes, interest on such taxes, and penalties with respect to such taxes.

B. Subject to the provisions of Section 4941 of the Code and the Regulations thereunder, the Corporation is authorized to expend funds of the Corporation to obtain such one or more policies of insurance as may be appropriate to fund the reasonable costs and expenses (including attorneys' fees) arising in connection with any judicial or administrative proceeding involving: (A) chapter 42 of subtitle D of the Code; or (B) laws relating to mismanagement of funds of charitable organizations. Any expenditures for insurance pursuant to the preceding sentence shall be treated as compensation to the members of the Board of Directors pro rata to the extent required by Section 4941 of the Code, and the Regulations thereunder.

ARTICLE X: DISSOLUTION

In the event of the dissolution of the Corporation or the winding up of its affairs, or other liquidation of its assets, all of the assets of the Corporation remaining after the payment of the Corporation's debts shall be conveyed or distributed to one or more charitable organizations, in such portions and amounts among them, as the Board of Directors may determine. Any such assets not so disposed of shall be disposed of by the Circuit Court of the County in which the Corporation's principal office is then located, exclusively for charitable purposes, or to such charitable organization or charitable organizations as such Court shall then determine.

ARTICLE XI: BYLAWS

The Board of Directors shall adopt Bylaws for the regulation and management of the Corporation and such Bylaws shall be consistent with these Articles of Incorporation and the Florida Not For Profit Corporation Act.

ARTICLE XII: AMENDMENT OF ARTICLES

These Articles of Incorporation may be amended to delete the names and addresses of the original Directors, to delete the name and address of the initial registered agent or registered office if a statement of change is on file with the secretary of state, or to change the corporate name by substituting the word "corporation," "incorporated," "company," "limited," or the abbreviation "corp.," "inc.," "co.," or "ltd.," for a similar word or abbreviation in the name, or by adding, deleting or changing a geographical attribution to the name upon approval by the Board of Directors.

B. These Articles of Incorporation may be amended to alter the number of Directors, the composition of the Board, the term of office of Directors, or the way in which Directors are elected (or chosen), and any other amendments may be made to these Articles of Incorporation upon approval by a majority of the Board of Directors.

IN AFFIRMATION of the facts stated above,

Dated: ALISUST 5,2017

Dr. Kiran C. Patel, Incorporator

Having been named as registered agent to accept service of process for the above stated corporation at the place designated in this certificate, I am familiar with and accept the appointment as registered agent and agree to act in this capacity

N/L ____

Rupesh R. Shah, Registered Agent

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Date