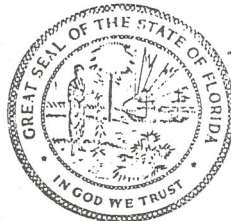


4u

State of Florida

Department of State



I, Tom Adams, Secretary of State of the State of Florida,
Do Hereby Certify That the following is a true and correct copy of

Certificate of Incorporation
of

INDEPENDENT CHURCH OF GOD, INC.

a corporation not for profit organized and existing under the Laws of the
State of Florida, filed on the 29th day of July,
A.D., 19 70, as shown by the records of this office.

Given under my hand and the Great Seal of the
State of Florida, at Tallahassee, the Capital,
this the 29th day of July,
A.D. 19 70.



Tom Adams
Secretary of State

ARTICLES OF INCORPORATION

-of-

INDEPENDENT CHURCH OF GOD, INC.
(a non-profit organization)

The undersigned, all of lawful age and citizens of the United States of America, hereby associate ourselves together for the purpose of becoming a corporation, not for profit, under the laws of the State of Florida.

ARTICLE I

The name of the corporation shall be:
INDEPENDENT CHURCH OF GOD, INC.

ARTICLE II

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

- A. To establish a spiritual association that will uplift and inspire the consciousness of its members, students and the interested public at large.
- B. To conduct for religious worship and instruction churches, schools, pastoriums, and other institutions connected therewith of a religious, educational, charitable and benevolent character to the end that its own members and others may be generally instructed and guided.
- C. To study, teach and exemplify the doctrines of both Old and New Testaments, especially the teachings of Jesus; and to present Christianity in its modern setting.
- D. To study and practice spiritual healing, as set forth in the Bible.
- E. To establish other churches in due course of time; to ordain and certify duly qualified Ministers, teachers and counsellors, as they fulfill periods of instruction, give evidence of qualification and are found to be worthy.

FILED
JUN 29 6 54 1970
CORPORATION DIVISION
MIAMI, FLORIDA

F. To establish and distribute lessons, discourses, bulletins, magazines, books and other educational material in pursuance of the above objectives.

G. To make a worthy contribution to the spiritual, religious, cultural and educational life of all geographical locations in which the Church or its members are active.

ARTICLE III

This corporation shall have all of the corporate powers set forth under the provisions of the 1969 Florida Statutes as they now exist and as they may be amended from time to time, including the power to raise and expend funds for the carrying out of the purposes of this corporation, including mail solicitation, advertising campaigns in any of the media, fund-raising by personal solicitation and otherwise; the borrowing of money, pledging of property as security; the right to own personal property and real property in this state or any other state; the power to sign and enter into contracts and all other legal instruments; and the right to sell any of its property at any time upon such terms as the corporation deems desirable.

ARTICLE IV

The membership of the Church shall consist of individuals who are interested in the study and application of the nature and objectives of this Church, who may be admitted upon expressing a desire to join and a willingness to abide by any by-laws that may be adopted.

ARTICLE V

The Church shall have perpetual existence.

ARTICLE VI

The names and residences of the subscribers are as follows:

Frank A. Sturgis 2515 N. W. 122nd Street
Miami, Florida

Janet H. Sturgis 2515 N. W. 122nd Street
Miami, Florida

Doris E. Hunt 1632 N. W. 112th Street
Miami, Florida

ARTICLE VII

The officers of the corporation by which the affairs of the Church shall be managed are: President, Vice-President, Secretary and Treasurer. Elections by all officers shall be held annually in accordance with the By-Laws; with the exception of the President, who shall have life tenure.

ARTICLE VIII

The names and addresses of the officers and persons constituting the first Board of Directors until the first election are as follows:

President	Frank Sturgis	2515 N. W. 122nd Street Miami, Florida
Vice President	Doris E. Hunt	1632 N. W. 112th Street Miami, Florida
Secretary-Treasurer	Janet H. Sturgis	2515 N. W. 122nd Street Miami, Florida

ARTICLE IX

The corporation shall have its location at 2515 N. W. 122nd Street, Miami, Florida, and at such further offices as may be hereafter required.

ARTICLE X

The By-Laws of the corporation are to be made, altered or rescinded by two-thirds (2/3) majority vote of the active members in good standing present at any meeting, provided that the purpose of the meeting and the change in the By-Laws to be voted on has been plainly stated in the notice of the meeting mailed to the membership at least seven (7) days prior to the time of such meeting.

ARTICLE XI

Amendments to the Articles of Incorporation may be proposed by a majority vote of the Board of Directors at any meeting, and shall be adopted by a two-thirds (2/3) majority vote of the active members in good standing

present at any meeting, provided that the purpose of the meeting and the amendments to the Articles of Incorporation to be voted on have been plainly stated in the notice of the meeting mailed to the membership at least seven (7) days prior to the time of such meeting.

WITNESS the hands and seals of the incorporators this 22 day of July, 1970, at Miami, Dade County, Florida.

s/ FRANK A. STURGIS (SEAL)
Frank A. Sturgis

s/ JANET H. STURGIS (SEAL)
Janet H. Sturgis

s/ DORIS E. HUNT (SEAL)
Doris E. Hunt

STATE OF FLORIDA)
 : ss.
COUNTY OF DADE)

BEFORE ME, a Notary Public in and for the State of Florida, this day personally appeared FRANK A. STURGIS, JANET H. STURGIS and DORIS E. HUNT, to me well known and known to me to be the persons described in and who executed the foregoing Articles of Incorporation and acknowledged before me the execution thereof for the uses and purposes therein stated and expressed.

WITNESS my hand and official seal at Miami, Dade County, Florida, on this 22 day of July, 1970.

/s/ SHERRI L. GRANT
Notary Public, State of Florida at
Large.
My Commission Expires: June 11, 1974

(Notarial Stamp)

4u

ARTICLES OF INCORPORATION

-of-

INDEPENDENT CHURCH OF GOD, INC.

(a non-profit organization)

The undersigned, all of lawful age and citizens of the United States of America, hereby associate ourselves together for the purpose of becoming a corporation, not for profit, under the laws of the State of Florida.

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C. To study, teach and exemplify the doctrines of both Old and New Testaments, especially the teachings of Jesus; and to present Christianity in its modern setting.

D. To study and practice spiritual healing, as set forth in the Bible.

E. To establish other churches in due course of time; to ordain and certify duly qualified Ministers, teachers and counsellors, as they fulfill periods of instruction, give evidence of qualification and are found to be worthy.

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JUN 29 6 54 AM '70
COUNTY CLERK
MIAMI, FLORIDA

Frank A. Sturgis 2515 N. W. 122nd Street
Miami, Florida

Janet H. Sturgis 2515 N. W. 122nd Street
Miami, Florida

Doris E. Hunt 1832 N. W. 112th Street
Miami, Florida

ARTICLE VII

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present at any meeting, provided that the purpose of the meeting and the amendments to the Articles of Incorporation to be voted on have been plainly stated in the notice of the meeting mailed to the membership at least seven (7) days prior to the time of such meeting.

WITNESS the hands and seals of the incorporators this 22 day of July, 1970, at Miami, Dade County, Florida.

S/ FRANK A. STURGIS (SEAL)
Frank A. Sturgis

S/ JANET H. STURGIS (SEAL)
Janet H. Sturgis

S/ DORIS E. HUNT (SEAL)
Doris E. Hunt

STATE OF FLORIDA)
 : ss.
COUNTY OF DADE)

BEFORE ME, a Notary Public in and for the State of Florida, this day personally appeared FRANK A. STURGIS, JANET H. STURGIS and DORIS E. HUNT, to me well known and known to me to be the persons described in and who executed the foregoing Articles of Incorporation and acknowledged before me the execution thereof for the uses and purposes therein stated and expressed.

WITNESS my hand and official seal at Miami, Dade County, Florida, on this 22 day of July, 1970.

/s/ SHERRI L. GRANT
Notary Public, State of Florida
Large.
My Commission Expires: June 11, 1974

(Notarial Stamp)

HW

I, the undersigned Secretary of INDEPENDENT CHURCH OF GOD, INC.

a corporation organized and existing under the laws of the State of Florida

DO HEREBY CERTIFY that at a meeting of the Board of Directors of said corporation, duly held on July 22, 1970 a quorum being present, the following resolutions were adopted and that the said resolutions have been entered upon the regular minute book of said corporation, are in accordance with the By-Laws and are now in full force and effect, to wit:

RESOLVED, that Commercial Bank & Trust Company Miami, Florida, be and it hereby is designated as a depository of this corporation subject to the rules and regulations set forth in the passbook and signature cards of said Bank, and any amendments thereto, and that the officers of this corporation or either or any of them and they hereby are authorized to open a bank account or accounts with the said Commercial Bank & Trust Company for and in the name of this corporation, and to deposit with the said Bank in the said account from time to time any and all checks, notes, drafts, bills of exchange, monies, acceptances, orders and other items of any kind.

Further, RESOLVED, that the President signing singly and their successors in office (or either) (or any of them) be and they are hereby authorized to sign any and all checks, drafts, notes, acceptances, bills of exchange, orders or other instruments for the payment and withdrawal of any and all monies, credits, items and property at any time held by the said Commercial Bank & Trust Company, for account of this corporation.

Further, RESOLVED, that Commercial Bank & Trust Company is hereby authorized to pay or cash any check or other order for the payment of money drawn by this corporation on any bank and payable to any officer (including the signing officer) of this corporation without inquiry and is further authorized to pay or cash any check or other order for the payment of money payable to or held by this corporation drawn on or payable through Commercial Bank & Trust Company or any bank when endorsed in the name of this corporation by the President, signing singly and to receive any such checks or other orders for the payment of money for credit to the account of any holder (including any officer of this corporation) without inquiry as to the circumstances of issue or endorsement thereof or the disposition of the proceeds, and even though the same be tendered in payment of the individual obligation of a signing officer.

Further, RESOLVED, that the President of this corporation are hereby authorized to borrow money and to obtain credit for this corporation from said Bank on such terms as may seem to them advisable, and to make and deliver notes, drafts, acceptances, agreements and any other obligations of this corporation therefor, in form satisfactory to said bank, signed by the President and as security therefor to pledge and trustee, withdrawal, exchange and substitute any stocks, bonds, bills and accounts receivable, bills of lading, warehouse receipts or any other property of this corporation, with full authority to endorse or guarantee the same in the name of this corporation, to execute and deliver all instruments and assignments and transfer and to affix the corporate seal; and also to discount any bills receivable or paper of any kind (negotiable or otherwise) with full authority to endorse same in the name of this corporation.

Further, RESOLVED, that endorsements on behalf of this corporation upon any and all commercial paper of any kind deposited by or on behalf of this corporation with the said Bank for credit or for collection or otherwise may be made by any one of the foregoing officers, or by rubber stamp.

Further, RESOLVED, that the foregoing authorized officials or any of them and their successors in office or any of them be and they are hereby authorized (a) for and on behalf of this corporation to lease from the Commercial Bank & Trust Company, a safe deposit box or boxes and enter into for and on behalf of this corporation and with the Commercial Bank & Trust Company, is required standard form of Safe Deposit Box Lease for corporations, and (b) for and on behalf of this corporation to have access to said box or boxes, in accordance with the terms, conditions, agreements, rules and regulations of the said Lease.

Further, RESOLVED, that all the foregoing authorities shall be and continue in full force and effect until revoked or modified by written notice actually received by said Commercial Bank & Trust Company, setting forth a resolution to that effect to have been adopted by the Board of Directors of this corporation and signed by the secretary or assistant secretary of this corporation and bearing this corporation's seal; and said Commercial Bank & Trust Company is hereby authorized and directed to at all times rely upon the last notice received by it of any resolution as to the foregoing authorities and as to the persons who from time to time are its officers, and their signatures, when such notice bears this corporation's seal and is signed by one purporting to be its secretary or assistant secretary.

I FURTHER CERTIFY that the foregoing resolutions are fully in accord with and pursuant to the By-Laws of said corporation.

I FURTHER CERTIFY that the following persons, whose genuine signatures appear below, are officers of said corporation in the capacity set opposite their respective signatures, to-wit:

<u>Freak Sturgis</u>	President
<u>Doris E. Hunt</u>	Vice-President
<u>Janet H. Sturgis</u>	Secretary <u>Treasurer</u>

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the seal of said corporation, this 15 day of December, 1970

(Seal of Corporation)

Freak Sturgis President.

Janet H. Sturgis Secretary.

Hu

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AFFIDAVIT UNDER FICTITIOUS NAME STATUTE

STATE OF FLORIDA)
COUNTY OF DADE) ss:

The undersigned, under oath, says; It is the intention of the undersigned to engage in a business enterprise under the fictitious name of _____

located at HELP THE HOMELESS FUND
2515 N.W. 133 STREET

in the city of MIAMI, Dade County, Florida.

Those interested in said enterprise, and the extent of the interest of each, is as follows:

<i>Print or type name</i>	<i>Signature</i>	<i>Interest</i>
<u>INDEPENDENT CHURCH</u>	<u>[Signature]</u>	<u>[Interest]</u>
<u>OF GOD, INC</u>	<u>[Signature]</u>	<u>[Interest]</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Sworn to and subscribed to before me, at MIAMI
day of NOV, 1971.

[Signature]
Notary Public, State of Florida at Large
My Commission Expires _____



[Proof of publication of this intention to register, is filed herewith, pursuant to the provisions of Chapter 20953, Laws of 1941 (865.09 FSA)]

ATTACH PROOF OF PUBLICATION

NOTARY PUBLIC STATE OF FLORIDA
COMMISSION EXPIRES _____

FORM SS-4
(3-69)
PART 4

NOTICE OF EMPLOYER
IDENTIFICATION NUMBER

Please make a separate
record of this number for
use in case this notice is
lost or destroyed.

74 7132911

INDEPENDENT CHURCH OF GOD INC
HELP THE HOMELESS FUND
2515 N.W. 122 ST
MIAMI, FLA. 33167

The Identification Number shown above will be used by the Internal Revenue Service to identify your Federal tax returns, and other documents, i.e., 1120, 940, 941, etc., and your payments of the taxes reported on such returns. Your Identification Number should be shown on such returns, documents, and on any related forms or correspondence.

**MIAMI REVIEW
AND DAILY RECORD**

*Published Daily except Saturday, Sunday and
Legal Holidays*

Miami, Dade County, Florida.

STATE OF FLORIDA
COUNTY OF DADE:

Before the undersigned authority personally ap-
peared Martha Drobnie, who on oath says that she
is the Office Manager of the Miami Review and
Daily Record, a daily (except Saturday, Sunday and
Legal Holidays) newspaper, published at Miami in
Dade County, Florida; that the attached copy of adver-
tisement, being a Legal Advertisement or Notice in
the matter of

HELP THE HOMELESS FUND

Fictitious Name

in the X X X Court,
was published in said newspaper in the issues of
November 3, 10, 17 and 24, 1971

Affiant further says that the said Miami Review
and Daily Record is a newspaper published at Miami,
in said Dade County, Florida, and that the said news-
paper has heretofore been continuously published in
said Dade County, Florida, each day (except Saturday,
Sunday and Legal Holidays) and has been entered as
second class mail matter at the post office in Miami,
in said Dade County, Florida, for a period of one year
next preceding the first publication of the attached
copy of advertisement; and affiant further says that
she has neither paid nor promised any person, firm
or corporation any discount, rebate, commission or
refund for the purpose of securing the advertisement
for publication in the said newspaper.

MAARTHA DROBNI
NOTARY
Sworn to and subscribed before me this 24th
day of November 1971
Maart Drobnie
Notary Public, State of Florida at Large.

(SEAL)
My Commission expires April 15, 1973.

RECORDED IN OFFICIAL RECORDS BOOK
OF DADE COUNTY, FLORIDA
RECORD VERIFIED

E. B. LEATHERMAN,
CLERK CIRCUIT COURT
E. B. Leatherman
ST. J. 11/24/71 D.C.

**NOTICE UNDER
FICTITIOUS NAME LAW
NOTICE IS HEREBY GIVEN**
that the undersigned, desiring to
engage in business under the
fictitious name of
HELP THE HOMELESS FUND
at
2315 N.W. 120 Street,
in the City of
Miami, Florida,
intends to register the said name
with the Clerk of the Circuit
Court of Dade County, Florida.
Filed at Miami, Florida, this
15th day of October, 1971.
**INDEPENDENT
CHURCH OF GOD, INC.**
A non-profit Florida
Corporation
By: **FRANK ST. JOHN,**
Pres.
11/5-19-17-29 Ad. No. 11126

District Director
Internal Revenue Service

Date: JUN 14 1972 In reply refer to: 411-12:00:2210



Independent Church of God, Inc.
2315 N.W. 122 Street
Miami, Florida 33167

Gentlemen:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code.

We have further determined you are not a private foundation within the meaning of section 509(a) of the Code, because you are an organization described in section 170(b)(1)(C)(i).

You are not liable for social security (FICA) taxes unless you file a waiver of exemption certificate as provided in the Federal Insurance Contributions Act. You are not liable for the taxes imposed under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you are not subject to the excise taxes under Chapter 42 of the Code. However, you are not automatically exempt from other Federal excise taxes.

~~Donors may deduct contributions~~ to you as provided in section 170 of the Code. ~~Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible~~ for Federal estate and gift tax purposes under sections 2055, 2106, and 2522 of the Code.

If your purposes, character, or method of operation is changed, you must let us know so we can consider the effect of the change on your exempt status. Also, you must inform us of all changes in your name or address.

You are not required to file Form 990, Return of Organization Exempt From Income Tax.

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

Please keep this determination letter in your permanent records.

Sincerely yours,

W. T. Coppinger
W. T. Coppinger
District Director

This determination letter is conditional upon you amending your Articles of Incorporation to limit your powers to those of an organization described in section 501(c)(3) of the Internal Revenue Code.