

# ARTICLES OF INCORPORATION

OF

J. EPSTEIN VIRGIN ISLANDS FOUNDATION, INC.

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CORPORATIONS

We, the undersigned natural persons of the age of twenty-one years or more, all of whom are bona fide residents of the Virgin Islands of the United States, acting as incorporators of a corporation to be named J. Epstein Virgin Islands Foundation, Inc., do adopt the following Articles of Incorporation for such corporation pursuant to the Nonprofit Corporations Law of the Virgin Islands (Chapter 3, Title 13, Sections 491 et seq. of the Virgin Islands Code), as the same may be amended from time to time, do make and file these Articles of Incorporation in writing and do certify:

## ARTICLE I

The name of the corporation (hereinafter referred to as the "Corporation") is J. EPSTEIN VIRGIN ISLANDS FOUNDATION, INC.

## ARTICLE II

The principal office of the Corporation in the Virgin Islands is located at 41-42 Kongens Gade, St. Thomas, Virgin Islands, and the name of the resident agent of the Corporation at that address is Paul Hoffman.

## ARTICLE III

A. The Corporation is organized exclusively for charitable, educational and scientific purposes within the meaning of section 501(c)(3) of the Internal Revenue Code of 1986 (or the corresponding provision of subsequent tax law). Notwithstanding any other provision of these Articles, the Corporation shall not carry on any activities not permitted to be carried on (i) by a corporation exempt from federal income tax under Section 501(c)(3), or (ii) by a corporation, contributions to which are deductible under Sections 170(c)(2), 2055(a)(2), 2106(a)(2)(A)(ii), 2522(a)(2) or 2522(b)(2).

B. No part of the net earnings of the Corporation shall inure to the benefit of any individual. The Corporation shall, however, be authorized and empowered to pay reasonable compensation for services rendered and to make payments in furtherance of its purposes. The Corporation may carry on propaganda or otherwise attempt to influence legislation but only to the extent permitted by the Internal Revenue Code. The Corporation shall not participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of or in opposition to any candidate for public office.