

Form C-102 Corporation Not For Profit  
Prescribed by Secretary of State — Anthony J. Celebrezze, Jr.

F106-1879

APPROVED  
FOR FILING  
By [Signature]  
Date 7-21-82  
Amount 25.00  
FOR OFFICIAL  
USE ONLY

# Articles of Incorporation

-OF-

OHIO PARKS RECREATION AND TOURISM FOUNDATION

(Name of Corporation)

The undersigned, desiring to form a corporation, not for profit, under Sections 1702.01 et seq., Revised Code of Ohio, do hereby certify:

FIRST. The name of said corporation shall be OHIO PARKS RECREATION AND TOURISM  
FOUNDATION

SECOND. The place in Ohio where the principal office of the corporation is to be located is  
COLUMBUS, FRANKLIN County.  
(City, Village or Township)

THIRD. The purpose or purposes for which said corporation is formed are:

The purposes for which the corporation is organized are to receive and maintain real or personal property, or both, and, subject to the restrictions and limitations hereinafter set forth, to use and apply the whole or any part of the income therefrom and the principal thereof exclusively for charitable, literary, or educational purposes either directly or by contributions to organizations that qualify as exempt organizations under Section 501 (c) (3) of the Internal Revenue Code and its Regulations as they now exist or as they may hereafter be amended.

No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to, any Trustee or Officer of the corporation, or any member of the corporation or any other private individual (except that reasonable compensation may be paid for services rendered to or for the corporation affecting one or more of its purposes), and no Trustee or Officer of the corporation, or any private individual shall be entitled to share in the distribution of any of the corporate assets on dissolution of the corporation. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publication or distribution of statements) any political campaign on behalf of any candidate for public office.

The corporation shall distribute its income for each taxable year at such time and in such manner as not to become subject to tax on undistributed income imposed by Section 4942 of the Internal Revenue Code of 1954, or corresponding provisions of any subsequent federal tax laws.

The corporation shall not engage in any act of self-dealing as defined in Section 4941 (d) of the Internal Revenue Code of 1954, or corresponding provisions of any subsequent federal tax laws.

The corporation shall not retain any excess business holdings as defined in Section 4943 (c) of the Internal Revenue Code of 1954, or corresponding provisions of any subsequent federal tax laws.

The corporation shall not make any investments in such manner as to subject it to tax under Section 4944 of the Internal Revenue Code of 1954, or corresponding provisions of any subsequent federal tax laws.

The corporation shall not make any taxable expenditures as defined in Section 4945 (d) of the Internal Revenue Code of 1954, or corresponding provisions of any subsequent federal tax laws.

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Notwithstanding any other provision of these Articles of Incorporation, the corporation shall not conduct or carry on any activities not permitted to be conducted or carried on by an organization exempt from taxation under Section 501 (c) (3) of the Internal Revenue Code and its Regulations as they now exist or as they may hereafter be amended, or by an organization, contributions to which are deductible under Section 170 (c) (2) of the Internal Revenue Code and Regulations as they now exist or as they may hereafter be amended.

Upon the dissolution of the corporation, the Board of Trustees shall, after paying or making provision for the payment of all of the liabilities of the corporation, dispose of all of the assets of the corporation exclusively for the purposes of the corporation in such manner, or to such organization or organizations organized and operated exclusively for charitable, educational, religious, or scientific purposes as shall at the time qualify as an exempt organization or organizations under Section 501 (c) (3) of the Internal Revenue Code of 1954 (or the corresponding provision of any future United States Internal Revenue Law), as the Board of Trustees shall determine. Any of such assets not so 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.

To have and exercise all the rights and powers conferred on nonprofit corporations under the Ohio Nonprofit Corporation Law, as such law is now in effect or may at any time hereafter be amended.

To do all other acts necessary or expedient for the administration of the affairs and attainment of the purposes of this corporation.

*Purpose Clause: To promote the development of parks, recreation  
AND TOURISM IN THE STATE OF OHIO.*

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FOURTH. The following persons, not less than three, shall serve said corporation as trustees until the first annual meeting or other meeting called to elect trustees.

GIVE STREET AND POST OFFICE ADDRESS

James J. Lowry ----- 3329 Riverside Drive, Columbus, Ohio 43221

Joseph H. Holmwood ----- 2447 Hemphill Rd., Kettering, Ohio 45440

Peter C. Colgan ----- 137 Crestview Rd., Columbus, Ohio 43202

IN WITNESS WHEREOF, We have hereunto subscribed our names, this 21 day of July, 19 82

James J. Lowry *James J. Lowry*

Joseph H. Holmwood *Joseph H. Holmwood*

Peter C. Colgan *P. C. Colgan*

(INCORPORATORS' NAMES SHOULD BE TYPED OR PRINTED BELOW SIGNATURES)

N. B. Articles will be returned unless accompanied by Form C-103 designating statutory agent.

See Section 1702.06, Revised Code.