

ARTICLES OF INCORPORATION

OF

Broad Run Crew Inc.

The undersigned, pursuant to Chapter 10 of Title 13.1 of the Code of Virginia, state(s) as follows:

FIRST. The name of the corporation is Broad Run Crew Inc.

SECOND. The corporation is to have one class of members. The members' rights and privileges will be specified in the corporate bylaws.

THIRD. Said organization is organized exclusively for the charitable, religious, educational, and scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under the section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code. The business activity for said organization is as follows: The organization will develop and promote amateur rowing at Broad Run High School in Ashburn, Virginia and in Loudoun County, Virginia.

No part of the net earnings of this organization shall inure to the benefit of, or be distributable to, its members, trustees, officers, or other private persons, except that the organization 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 this organization shall be the carrying on propaganda, or otherwise attempting to influence legislation, and this 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 provisions of this document, the corporation shall not carry on any other activity not permitted to be 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 the corresponding section of any future federal tax code.

Upon dissolution of this corporation, assets remaining 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 by the Court of Common Pleas of 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.

FOURTH. The directors of the corporation shall be elected or appointed by existing directors.

FIFTH. The name of the corporation's initial registered agent is United States Corporation Agents, Inc. The initial registered agent is a domestic or foreign stock or nonstock corporation, limited liability company, or registered limited liability partnership authorized to transact business in Virginia. The corporation's initial registered office address, which is the business office of the initial registered agent, is 4445 Corporation Lane, Ste. 259, Virginia Beach, VA 23462. The registered office is physically located in the county of Princess Anne.

SIXTH. The initial business office of the registered agent is 4445 Corporation Lane, Suite 259, Virginia Beach, VA 23462.

SEVENTH. The initial directors of the corporation are:

Aimee Love
Michael Reynolds
David Burke

EIGHTH. The Incorporator of the corporation is David Burke, 20584 Snowshoe Square, Ste. 201, Ashburn, VA 20147.

IN WITNESS WHEREOF, the undersigned incorporator has executed these Articles of Incorporation on the date below.

Date: June 19, 2018

Incorporator

David Burke, Assistant Secretary
20584 Snowshoe Square, Ste. 201
Ashburn, VA 20147