



20191223000475370 1/2 \$166.00
Shelby Cnty Judge of Probate, AL
12/23/2019 01:41:35 PM FILED/CERT

STATE OF ALABAMA)
 :
COUNTY OF SHELBY)

**CERTIFICATE OF FORMATION
OF
OPP19, LLC**

1. The name of the limited liability company formed hereby is Opp19, LLC, hereinafter sometimes referred to in this Certificate of Formation as the "Company."

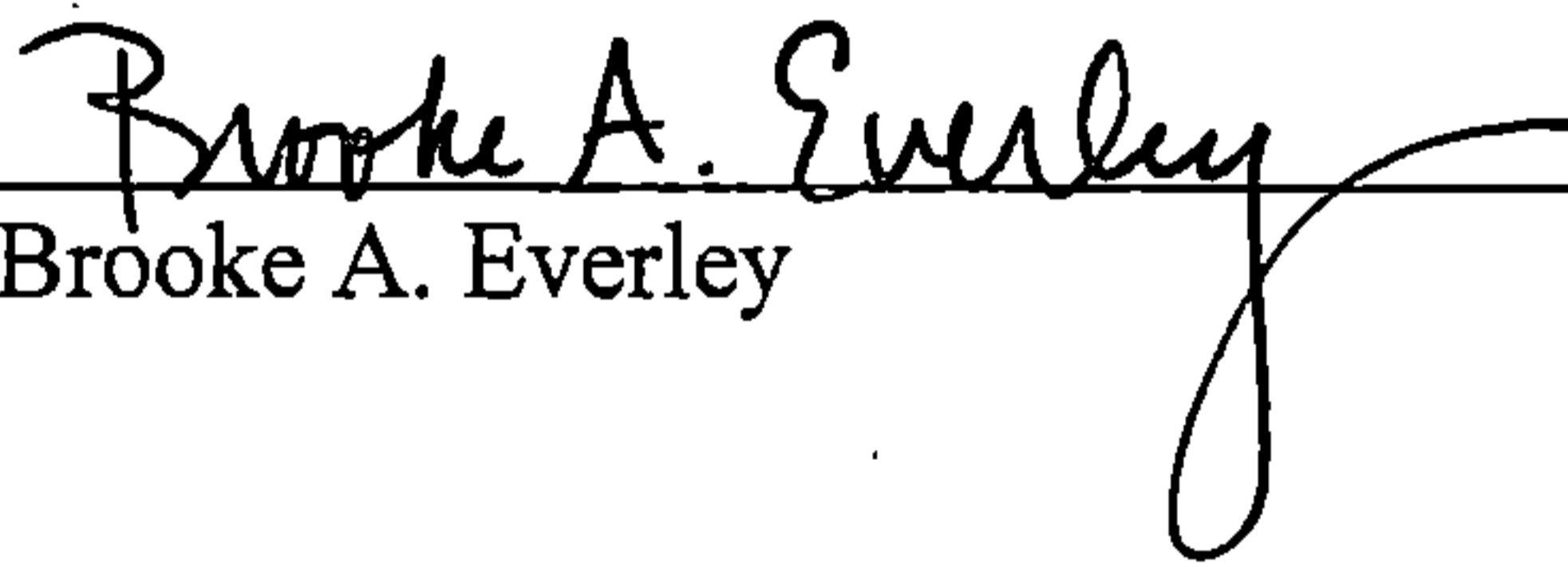
2. The location and mailing address of the initial registered office of the Company is 4900 Coshatt Drive, Hoover, AL 35244. The name of its initial registered agent at that address is Jeffrey Scott Gale.

3. There is at least one member of the Company.

4. The Company is organized with the purpose of becoming a Qualified Opportunity Fund (defined in Section 1400Z-2(d)(1) of the Code). Accordingly, the Company will invest in Qualified Opportunity Zone Property (as defined in Section 1400Z-2(d)(2)(A) – (D) of the Code) and Qualified Opportunity Zone Businesses (as defined in Section 1400Z-2(d)(3) of the Code).

5. The name and mailing address of the Organizer of the Company is Brooke A. Everley and 2100 1st Avenue North, Suite 600, Birmingham, Alabama 35203.

The undersigned, acting as an organizer of the limited liability company named herein, executes this Certificate of Formation as of this 19th day of December, 2019.



Brooke A. Everley

This instrument prepared by:
Brooke A. Everley, Esq.
Everley Law, LLC
The Landmark Center, Suite 600
2100 First Avenue North
Birmingham, AL 35203

John H. Merrill
Secretary of State

P.O. Box 5616
Montgomery, AL 36103-5616

STATE OF ALABAMA

I, John H. Merrill, Secretary of State of Alabama, having custody of the Great and Principal Seal of said State, do hereby certify that

pursuant to the provisions of Title 10A, Chapter 1, Article 5, Code of Alabama 1975, and upon an examination of the entity records on file in this office, the following entity name is reserved as available:

Opp19, LLC

This name reservation is for the exclusive use of Jeffrey Scott Gale, 4900 Coshatt Drive, Hoover, AL 35244 for a period of one year beginning December 19, 2019 and expiring December 19, 2020



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In Testimony Whereof, I have hereunto set my hand and affixed the Great Seal of the State, at the Capitol, in the city of Montgomery, on this day.

December 19, 2019

Date

John H. Merrill

Secretary of State



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