

Office of the Clerk Treasurer

201 Delafield Street
Waukesha, Wisconsin 53188-3633

Gina Kozlik, Clerk Treasurer

clerktreas@waukesha-wi.gov

1-262-524-3550

February 27, 2023

To: Natalie Driebel, Accounting Clerk, Finance Department

Re: Claim for Appeal of Tax Exemption Denial

**Submitted by: Global Assist Campus, Inc
Todd Nelson, Business Manager
915 N. Hartwell Ave.
Waukesha, WI 53186**

Date Claim Received: February 27, 2023

The enclosed is being sent to you to provide to our insurance or as needed for your review.

Sincerely,

**Gina Kozlik
City of Waukesha Clerk-Treasurer**

Cc: Clerk (original) / Finance / Attorney / Assessor



February 27, 2023

Gina Kozlik, CMC/WCMC
Waukesha City Clerk
201 Delafield Street, First Floor
Waukesha, WI 53188

RE: Appeal of tax exemption denial for 606 Beechwood, WAKC1302286.

We filed paperwork for a property tax exemption as a non-profit for the referenced property (see PR-230 included) on February 24, 2023. The tax exemption request for 606 Beechwood was denied. The specific reason(s) of the denial was not detailed to us in the denial letter dated February 24, 2023. Without specifics to the denial, I can only guess at what in our application needed clarification.

Per the procedure given me by Samuel A. Walker, I am filing an appeal to this decision allowed by Wisconsin statute 74.35 (for an unlawful tax). Global Assist Campus, Inc. is an integrated auxiliary of Ethnos360, Inc. and is a recognized public charity by the IRS and is exempt by the IRS as a 501(c)(3). We are a non-profit religious organization operating a collegiate level Bible school to prepare students for missionary service.

The occupant of our property, Garran Dick, is an ordained missionary member of Ethnos360 and serves at the school as a supported missionary. The role that he and his family play in preparing students for missionary service provide critical support of the educational effort of our Bible school. His ministry at the school is an integral part of the training ministry we have here at Ethbnos360 Bible Institute. Garran serves with student interns in his department and has interns into his home, all providing multiple training opportunities.

Further, his wife, Hannah Dick, serves in our Online Education Department handling enrollment, course registration, and student finances. It should also be noted that Hannah performs 60% to 75% of her ministry duties while in her home. She also mentors a student intern that serves in our Online Department. Both Garran and Hannah have a chapel small group that meets in their home.

I am attaching the original application for tax exemption and the letter of denial of the exemption request.

I appreciate your attention to this and look forward to answering any questions you may have.

Sincerely,

Todd Nelson
Business Manager



City Assessor's Office
201 Delafield Street
Waukesha, Wisconsin 53188-3633

Samuel A. Walker, Assessor
assessors@waukesha-wi.gov
(262) 524-3510

Friday, February 24, 2023

Global Assist Campus, Inc
Todd Nelson, Business Manager
915 N. Hartwell Ave.
Waukesha, WI 53186

RE: Denial of Tax Exemption Request

The Assessor's Office received the request for property tax exemption for the property listed below.

Parcel ID	1302.286.000
Property Address	606 Beechwood Ave

We evaluated the request to verify that the property qualified for property tax exemption under Wis Stats 70.11. However, after careful consideration and review of all information provided, it does not appear that the property qualifies and, therefore, the tax exemption request has been denied.

Sincerely,

Samuel A. Walker
MBA • MSML • AAS • RES • CPM
Waukesha City Assessor



STATE OF WISCONSIN PROPERTY TAX EXEMPTION REQUEST

State law requires owners seeking exemption of a property for the current assessment year to file this form along with any necessary attachments. Failure to complete this form in its entirety may result in denial of exemption. The completed form and attachments must be filed with the assessor in the taxation district where the property is located by March 1 to be eligible for the current assessment year. See sec. 70.11, Wis. Stats., and the [Wisconsin Property Assessment Manual](#) for additional property tax exemption information. If more space is needed for any questions, use the "Additional Information" box on page 4 or attach additional sheets.

SECTION 1 – APPLICANT INFORMATION

1. Applicant Name **Global Assist Campus, Inc.** Date **02 / 23 / 2023**

2. Applicant is Sole proprietorship WI Chapter 181 corporation WI unincorporated nonprofit association
 Other (please explain): **501(c)(3) Religious non-profit**

3. Contact person: **Todd Nelson**
 Address: **915 N Hartwell Ave
 Waukesha, WI 53186**
 Telephone number(s): **262-832-7323**
 Email: **todd_nelson@ntm.org**
 Relationship to applicant: **Business Manger**

4. Registered agent:
 Address:
 Telephone number(s):
 Email:

5. Mailing address and phone number of Applicant if different than Contact Person:
Global Assist Campus, Inc. 312 W 1st Street, Sanford, FL 32771 407-323-3430

6. Identify each organizational officer, the officer's address, the telephone number and the position held within the requesting organization. See additional information on page 4

7a. Please identify the use of the property:

<input type="checkbox"/> Agricultural Fair	<input type="checkbox"/> Library	<input type="checkbox"/> Rehabilitation	<input type="checkbox"/> Fraternity
<input type="checkbox"/> YMCA/YWCA	<input type="checkbox"/> Fire Company	<input type="checkbox"/> Military	<input type="checkbox"/> Hospital
<input type="checkbox"/> Cemetery	<input type="checkbox"/> Lions Camp	<input type="checkbox"/> Bible Camp	<input type="checkbox"/> Memorial
<input type="checkbox"/> Farmer's Temple	<input type="checkbox"/> Archaeological Site	<input type="checkbox"/> Art Gallery	<input type="checkbox"/> Charity
<input type="checkbox"/> Held for Public Interest	<input checked="" type="checkbox"/> Housing	<input type="checkbox"/> Disability Camps	<input type="checkbox"/> Labor Temple
<input type="checkbox"/> Industrial Development Agencies	<input type="checkbox"/> Waste Treatment	<input type="checkbox"/> Radio Station	<input type="checkbox"/> Medical Research
<input type="checkbox"/> Sports/Entertainment	<input type="checkbox"/> Humane Society	<input type="checkbox"/> Youth Hockey	<input type="checkbox"/> Theater
<input type="checkbox"/> Mental/Physical Disabled Camp	<input type="checkbox"/> Railroad Historic Society	<input type="checkbox"/> Youth Baseball Association	<input type="checkbox"/> Benevolent
<input type="checkbox"/> Local Exposition	<input type="checkbox"/> Historic/Architectural	<input type="checkbox"/> Dependent & Development Disability	<input type="checkbox"/> Professional Sport/Entertainment Stadium
<input checked="" type="checkbox"/> Educational	<input checked="" type="checkbox"/> Religious	<input type="checkbox"/> Other (please explain in the "Additional information" box on page 4)	
<input type="checkbox"/> Women's Club	<input type="checkbox"/> Historical Society		

7b. Identify the precise statutory reference and language supporting the exemption. Wisconsin Statute 70.11 - See pg. 4

8. State the organization's purpose, mission, and primary goal: **Establish believers in the foundational truths of the Bible with an emphasis on Church planting among people w/o access to the Gospel**

9. Describe the services provided by the organization: **Spiritual education and discipleship**

10. List the primary beneficiaries of the services: **Young men and women seeking to serve in full-time ministry**

11. Is there a fee charged, or revenue earned, for services provided? Yes No N/A
 If Yes, what is the amount of the fee charged or revenue earned? **approx. \$6,000 per semester**

12. Do you provide any free service? Yes No N/A
 If Yes, explain: **Laundry services**

13. What percent of recipients receive free service (on an annual basis) N/A 100 %

14. Do you provide service to anyone at below market or reduced rates? Yes No N/A
 If Yes, explain:

15. What percentage of annual recipients receive services at below or reduced rates? N/A _____ %

16. Are you under any obligation to provide services to those who cannot pay? Yes No N/A
If Yes, explain:

17. Does Applicant receive any subsidies, grants, or low or no interest loans to operate or otherwise provide its services? If Yes, identify sources and amounts and how monies are applied or used. Yes No N/A

18. How much of Applicant's annual gross income or revenue is derived from donations? \$ _____
What percentage is that of Applicant's total annual income or revenue? N/A _____ %

SECTION 2 – SUBJECT PROPERTY INFORMATION

* N/A

* If N/A, explain in the "Additional information" box on page 4 of this form.

19. Property for which exemption is being applied ("Subject Property"):
Address: 606 Beechwood
Tax parcel number: WAKC1302286 Number of acres: <1
Legal description: Lot 13, in block "C", in Randles Addition to the City of Waukesha, being a part of the northwest 1/4 of section 2, township 6 north, range 19 east, in the City of Waukesha, Waukesha County, Wisconsin.

20. Estimated fair market value of Subject Property: \$ 265,000
If based on an independent appraisal, identify the appraiser and the purpose of the appraisal below.
Appraiser: _____ as of ____ / ____ / ____
Purpose of Appraisal: _____

21. Owner of Subject Property: Global Assist Campus, Inc.
If Owner is different from Applicant, explain and identify the relationship between Applicant and Owner.

22. Date Owner acquired Subject Property: 4/22 / 2022

23. Person or entity from whom Owner acquired Subject Property: Benjamin and Darci Lindstrom

24. Date Owner first began using and occupying Subject Property: 4/22 / 2022

25. Date Applicant first began using and occupying the Subject Property: 4/22 / 2022

26. Explain precisely how Applicant actually uses the Subject Property: See pg. 4 for details

27. Explain in detail why Applicant feels the Subject Property qualifies for property tax exemption. Finally, describe precisely how applicant and the Subject Property fit within that statutory language.
We are a non-profit religious organization operating a collegiate level Bible school to prepare students for missionary service. The roles that the Dick family play in that effort provide critical support of the educational effort.

SECTION 3 – TENANT INFORMATION

N/A

28. Identify all persons and entities other than Owner who have the right to use and occupy any part of the Subject Property. Include all tenants, licensees, and concessionaires of the Subject Property. Use the space provided on page 4 or attach additional pages as necessary. For each, include:

- a. Name of tenant or occupant. Garran and Hannah Dick
- b. Their mailing address and phone number. 915 N Hartwell Ave, Waukesha, WI 53186 719-217-4933
- c. Their interest in the Subject Property. Renter
- d. A precise and detailed explanation of how they actually use the Subject Property. Residence
- e. The date from which they began occupancy of the Subject Property. July 2023
- f. The monthly rate or fee they pay to use or occupy the Subject Property. \$372 plus utilities
- g. An explanation of how rent or other fees they pay to use and occupy the Subject Property are used and applied. Maintenance
- h. The portion of the Subject Property they use or occupy. 100%

Indicate number of users other than owner, if there are no other users, enter "None". Number of other users: None

29. Identify the percentage of the Subject Property that is used or occupied by persons other than owner. _____ 0 %

30. Was the subject Property used in an unrelated trade or business for which the Owner was subject to taxation under section 511 to 515 of the Internal Revenue Code? If Yes, explain: Yes No

SECTION 4 – ATTACHMENTS

31. ATTACH COPIES OF THE FOLLOWING DOCUMENTS:

A. Documents regarding applicant, owner, tenant(s), or occupant(s) of the Subject Property (where applicable):


1. Proof of non-profit status (e.g. Determination Letter under I.R.C. 501(c)(3)).
2. Partnership Agreement, Association Documents, Articles of Incorporation, Charter and By-laws, including any amendments thereto.
3. Latest annual report filed with State Department of Financial Institutions.
4. Curriculum of educational courses offered.
5. Part II of Form 1023 (Application for Recognition of Exemption) filed with the Internal Revenue Service.
6. Form 990 (Return of Organization Exempt from Income Tax).
7. Form 990T (Exempt Organization Business Income Tax Return).
8. Ordination papers for the occupants if the Subject Property is to be considered eligible as housing for pastors and their ordained assistants, members of religious order and communities, or ordained teachers.
9. Leases and subleases affecting the Subject Property or any part thereof, including all amendments thereto.
10. Concessionaire agreements, license agreements, and other documents regarding the use of occupancy of the Subject Property or any part thereof, including all amendments thereto.
11. Covenants, restrictions, rules and regulations (recorded or unrecorded), and all amendments thereto, affecting use or occupancy of the Subject Property or title thereto and all amendments thereto.
12. Mortgages (recorded or unrecorded) affecting the Subject Property.
13. Copy of the documents listed in 1 through 12 above as the same relate to any tenant or occupant of the property.
14. Any other information that would aid in determining exempt status.

B. Documents regarding the Subject Property:

1. Survey of the Subject Property. This includes certified survey maps and subdivision maps and plats.
2. An Appraisal of the Subject Property.
3. Deeds or instruments of conveyance by which organization acquired interest in the Subject Property.
4. Any other information that would aid in determining exempt status.


SECTION 5 – AFFIDAVIT

Under penalties of perjury, I, on behalf of the above-named organization/Applicant, hereby certify that I am authorized to sign and submit this application, and that the information and documents submitted herewith are true and correct to the best of my knowledge and belief.

Title Business Manager	Telephone (262) 832 – 7323	Date 2/24/2023
Signature 	Name (printed) Todd Nelson	

STATE OF WISCONSIN
 COUNTY OF: Wisconsin

Subscribed and sworn to before me this 24 day of February, 2023


 Notary Public
 My Commission expires on Feb 5, 2026

W. Dean Mundy
 Notary Public
 State of Wisconsin

Note: The following text is an excerpt from Stat., Sec. 70.11. Refer to current Wisconsin Statutes for the complete language or sections applicable to the exemption of property from taxation.

70.11 Property exempted from taxation. The property described in this section is exempted from general property taxes if the property is exempt under sub. (1), (2), (18), (21), (27) or (30); if it was exempt for the previous year and its use, occupancy or ownership did not change in a way that makes it taxable; if the property was taxable for the previous year, the use, occupancy or ownership of the property changed in a way that makes it exempt and its owner, on or before March 1, files with the assessor of the taxation district where the property is located a form that the department of revenue prescribes or if the property did not exist in the previous year and its owner, on or before March 1, files with the assessor of the taxation district where the property is located a form that the department of revenue prescribes. Except as provided in subs. (3m)(c), (4)(b), (4a) (f), and (4d), leasing a part of the property described in this section does not render it taxable if the lessor uses all of the leasehold income for maintenance of the leased property, construction debt retirement of the leased property or both and if the lessee would be exempt from taxation under this chapter if it owned the property. Any lessor who claims that leased property is exempt from taxation under this chapter shall, upon request by the tax assessor, provide records relating to the lessor's use of the income from the leased property.

Additional information:

Question 6 - President: Dean C Hess, 312 W 1st Street, Sanford, FL, 32771, 407-547-2369. Chairman: Chris Saber, 312 W 1st Street, Sanford, FL, 32771, 407-323-3430. Member: Danny L Kreider, 312 W 1st Street, Sanford, FL 32771, 407-547-2364, Member: Dallan W Anderson, 312 W 1st Street, Sanford, FL 32771, 407-323-3430, Secretary: Timothy W Miesel, 312 W 1st Street, Sanford, FL 32771, 407-323-3430.

Question 7b - Precise Statutory Language: Wisconsin Statute 70.11 (4) Educational, Religious, and Benevolent Institutions; women's clubs; Historical Societies; Fraternities; Libraries (a)Property owned and used exclusively by educational institutions offering regular courses 6 months in the year, or by churches or religious ...

We operate a Bible school, providing religious education and our offering of courses exceed 6 months in a year.

Question 26 - Garran Dick serves in building, grounds and maintenance. He serves with 6 student interns which involves discipleship during ministry hours. He also has those same interns into his home for further discipleship. Hannah serves in our Online education department and handles enrollment, course registration and finances. She mentors a student intern in the home who serves in our Online department. Both Garran and Hannah have a chapel small group of 11 students that meet in their home.

“Set for the Defense of the Gospel”

**This is to certify that after a satisfactory
testimony of his Christian experience,
call to the ministry,
and view of Bible doctrine,**

GARRAN DAWSON DICK

Is ordained to the work of

The Gospel Ministry

this 1st day of February, 2016

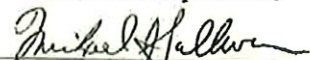
by

**New Tribes Mission, Inc.
Sanford, Florida, U.S.A.**




Chairman/CEO


Director of Operations


Director of Church Relations


General Secretary

Valid only for duration of service with New Tribes Mission.

**This is to certify that after a satisfactory
testimony of her Christian experience,
call to missionary service,
and view of Bible doctrine,**

HANNAH KRISTINE DICK

Is commissioned to the work of

Missionary Ministry

this 1st day of February, 2016


by

**New Tribes Mission, Inc.
Sanford, Florida, U.S.A**





Chairman/CEO



Director of Operations



Director of Church Relations



General Secretary

Valid only for duration of service with New Tribes Mission

Date of this notice: 12-13-2013

Employer Identification Number:
46-4304322

Form: SS-4

Number of this notice: CP 575 E

GLOBAL ASSIST CAMPUS INC
1000 E FIRST STREET
SANFORD, FL 32771

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN 46-4304322. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it's very important that you use your EIN along with your complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information shown above isn't correct, please send us the correction using the attached tear-off stub.

Annual filing requirements

Most organizations with an EIN have an annual filing requirement, even if they engage in minimal or no activity.

A. If you are tax exempt, you may be required to file one of the following returns or notices:

- Form 990, Return of Organization Exempt From Income Tax
- Form 990-EZ, Short Form Return of Organization Exempt From Income Tax
- Form 990-PF, Return of Private Foundation
- Form 990-N, e-Postcard (available online only)

Additionally, you may be required to file your annual return electronically.

If an organization required to file a Form 990, Form 990-PF, Form 990-EZ, or Form 990-N does not do so for three consecutive years, its tax-exempt status is automatically revoked as of the due date of the third return or notice.

Please refer to www.irs.gov/990filing for the most current information on your filing requirements.

B. If you are not tax-exempt, you may be required to file one of the following returns:

- Form 1120, U.S. Corporation Income Tax Return
- Form 1041, U.S. Income Tax Return for Estates and Trusts
- Form 1065, U.S. Return of Partnership Income

Please refer to Publication 1635, Understanding Your EIN, for more information about which forms you may be required to file.

Applying for Tax-Exempt Status

Receiving an EIN from the IRS is not the same thing as receiving IRS recognition of tax-exempt status. To apply for formal recognition of tax-exempt status, most organizations will need to complete either Form 1023, *Application for Recognition Under Section 501(c)(3) of the Internal Revenue Code*, or Form 1024, *Application for Recognition of Exemption Under Section 501(a)*. Submit the completed form, all applicable attachments, and the required user fee to:

Internal Revenue Service
PO Box 12192
Covington, KY 41012-0192

Publication 557, *Tax Exempt Status for Your Organization*, has details on the application, process as well as information on returns you may need to file.

Additional information

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you don't have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.

IMPORTANT REMINDERS:

- * Keep a copy of this notice in your permanent records. **This notice is issued only one time and the IRS will not be able to generate a duplicate copy for you.** You may give a copy of this document to anyone asking for proof of your EIN.
- * Use this EIN and your name exactly as they appear at the top of this notice on all your federal tax forms.
- * Refer to this EIN on your tax-related correspondence and documents.
- * Provide future officers of your organization with a copy of this notice.

If you have questions about your EIN, you can contact us using the phone number or address shown at the top of this notice. If you write, please tear off the stub at the bottom of this notice and send it along with your letter. If you don't need to write us, please don't complete and return this stub.

Your name control associated with this EIN is GLOB. You will need to provide this information, along with your EIN, if you file your returns electronically.

Thank you for your cooperation.



TWO-YEAR ACADEMIC PROGRAM

FIRST SEMESTER

Course #	Course Name	Credit Hours
TH 125	Bibliology	1
BI 101	Biblical Foundations	1
BI 111	Pentateuch	4
BI 112	Old Testament History	3
BI 114	Proverbs	1
EV123	Evangelism in a Postmodern World	2
BI122	Hermeneutics I	3

SECOND SEMESTER

Course #	Course Name	Credit Hours
TH 125	Theology	1
TH 176	Anthropology/Hamartiology	1
TH 177	Christology	1
BI 167	Prophets	3
BI 194	Life of Christ	3
BI 195	Acts	2
BI 198	1 Corinthians	2
MI 173	Bible Basis of Missions	1
BI 172	Hermeneutics II	1



THIRD SEMESTER

Course #	Course Name	Credit Hours
TH 225	Soteriology	1
TH 226	Pneumatology	1
TH 227	Angelology	1
BI 231	Romans	3
BI 238	II Corinthians	1
BI 235	Hebrews	2
BI 232	Galatians	1
BI 234	Ephesians	1
BI 236	James and Jude	1
BI 237	1 and 2 Peter	1
SO 228	Family Relationships	1
MI 252	Missions in Church History	1

FOURTH SEMESTER

Course #	Course Name	Credit Hours
TH 275	Eschatology	1
TH 276	Ecclesiology	1
MN 278	Public Speaking	1
BI 293	Philippians	1
BI 295	Colossians and Philemon	1
BI 294	Pastoral Epistles	2
BI 292	1 and 2 Thessalonians	1
BI 296	1, 2, and 3 John	1
BI 297	Daniel and Revelation	2
BI 272	Christian Life	2
MI 273	Intro to Cross-Cultural Church Planting	1

Electives – In addition to the core classes listed above, students must choose an additional 5 elective credits for a total of 64 credits.

13 DEC 11 AM 11:01

**ARTICLES OF INCORPORATION
OF
GLOBAL ASSIST CAMPUS, INC.**

The undersigned incorporator, being competent to contract, subscribes to these Articles of Incorporation (the "Articles") to form a corporation not-for-profit under the laws of the State of Florida.

ARTICLE I - Name

The name of the Corporation shall be:

Global Assist Campus, Inc. (the "Corporation").

ARTICLE II - Principal Office and Mailing Address

The principal office and mailing address of the Corporation is 1000 E. First Street, Sanford, Florida 32771.

ARTICLE III - Purpose

A. The Corporation is organized exclusively for charitable, religious or educational purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended (or the corresponding provision of any future United States Internal Revenue law) (the "Code"), and in particular:

(a) To operate exclusively for the benefit of New Tribes Mission, Inc., a Florida not-for-profit corporation that is exempt from federal income tax under Section 501(c)(3) of the Code (the "Supported Organization");

(b) To own property, including real property, tangible and intangible property, to be operated, invested and otherwise used for the benefit of or on behalf of the Supported Organization;

(c) To make distributions to or on behalf of the Supported Organization for its religious, charitable, and educational purposes, determined from time to time by the directors of the Corporation, in their sole and exclusive discretion; and

(d) To engage in any and all lawful activities to accomplish the foregoing purposes except as restricted herein.

B. The Corporation is organized for purposes of engaging in any activity or business permitted under the laws of the United States and of the State of Florida and shall have all of the powers enumerated in the Florida Not For Profit Corporation Act, as the same now exists and as hereafter amended, and all such other powers as are permitted by applicable law; provided,

however, that the Corporation shall not carry on any other activities not permitted to be carried on by organizations that constitute "supporting organizations" under Section 509(a)(3) of the Code.

C. No part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to, the Corporation's directors, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable amounts for services rendered and to make payments and distributions in furtherance of the purposes set forth in this Article III. 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, or in opposition to, any candidate for public office.

ARTICLE IV - Term of Existence

The effective date upon which the Corporation shall come into existence shall be the date of filing of these Articles, and it shall exist perpetually thereafter unless dissolved according to law.

ARTICLE V - Initial Registered Office and Agent

The street address of the initial registered office of the Corporation is 1000 E. First Street, Sanford, Florida 32771, and the name of the initial registered agent of the Corporation at that address is Scott Ross.

ARTICLE VI - Directors

- A. The initial number of directors of the Corporation shall be three (3).
- B. The number of directors may be either increased or diminished from time to time in accordance with the Bylaws of the Corporation, but there shall always be at least three directors.
- C. Directors, as such, shall not receive any compensation for their services. The board of directors may authorize and require the payment of reasonable expenses incurred by directors in attending meetings of the board of directors.
- D. Nothing in this Article VI shall be construed to preclude the directors from serving the Corporation in any other capacity and receiving compensation therefor.
- E. The names and street addresses of the initial members of the board of directors are:

<u>Name</u>	<u>Street Address</u>
Dan Kreider	1000 E. First Street Sanford, Florida 32771
Russ Harris	1000 E. First Street Sanford, Florida 32771

<u>Name</u>	<u>Street Address</u>
Scott Ross	1000 E. First Street Sanford, Florida 32771

E Directors shall be elected, appointed, and removed as provided in the Bylaws of the Corporation, and shall have the qualifications set forth in the Bylaws.

ARTICLE VII - Incorporator

The name and street address of the incorporator signing these Articles is:

<u>Name</u>	<u>Street Address</u>
Dan Kreider	1000 E. First Street Sanford, Florida 32771

ARTICLE VIII - Members

The Corporation shall not have members.

ARTICLE IX - Amendment to Articles and Bylaws

A. These Articles and the Bylaws of the Corporation may be amended in any manner permitted by law; provided, however, that any such amendment that effects the purpose of the Corporation, the transfer or disposition of real property, the relationship between the Corporation and the Supported Organization, the manner in which directors are appointed, director qualifications, limitations to corporate power, or the requirements for amending these Articles or the Bylaws of the Corporation shall not be effective or filed unless approved by the board of directors of the Corporation and the board of directors of the Supported Organization.

B. Notwithstanding the foregoing, upon the occurrence of a Triggering Event (as defined below), the board of directors of the Corporation may amend the Articles and/or the Bylaws without the approval of the board of directors of the Supported Organization, including amendments that identify a new tax exempt entity or entities to be supported or that eliminate the supporting organization purpose of the Corporation.

For purposes of this Article IX, a Triggering Event shall mean:

- (a) the dissolution of the Supported Organization by any means, other than an administrative dissolution that is corrected by reinstatement promptly after the Supported Organization becomes aware of such administrative dissolution,
- (b) the bankruptcy or insolvency of the Supported Organization, other than an involuntary bankruptcy that is dismissed within ninety (90) days after being filed,

(c) the Supported Organization loses its tax exempt status, or

(d) a judgment is entered against the Supported Organization either (a) permanently enjoining the operations of the Supported Organization, or (b) for damages in an amount that, according to the Board of Directors of the Supported Organization, would, or is likely to, render the Supported Organization insolvent or otherwise unable to continue the ministry activities of the Supported Organization in a manner consistent with their current practices.

ARTICLE X – Dissolution

A. Upon the dissolution of the Corporation, the board of directors shall, after paying or making provision for the payment of all of the liabilities of the Corporation, dispose of all the assets of the Corporation exclusively to the Supported Organization, if the Supported Organization is then exempt under Section 501(c)(3) of the Internal Revenue Code. If the Supported Organization is not then exempt, the remaining assets shall be distributed exclusively to such organization or organizations that at such time qualify as an exempt organization or organizations under Section 501(c)(3) of the Code, and that are organized and operated for a purpose consistent with the purpose of the Supported Organization.

B. Any assets not disposed of by the board of directors as provided herein, shall be disposed of by a court of competent jurisdiction in the county in which the principal office of the Corporation is then located, exclusively to the Supported Organization if possible or, if not possible, to one or more organizations that qualify as an exempt organization under Section 501(c)(3) of the Code and are organized and operated for a purpose consistent with the purpose of the Supported Organization.

ARTICLE XI – Compliance with Facts and Circumstances Test

A. Organizational Test.

(a) General. These Articles hereby: (i) limit the purpose of the Corporation to one or more of the purposes set forth in Code Section 509(a)(3)(A); (ii) do not expressly empower the Corporation to engage in activities that are not in furtherance of the purposes referred to in subdivision (i) of this paragraph; (iii) state, that the "specified" publicly supported organization on whose behalf this Corporation is to be operated (within the meaning of Reg. §1.509(a)-4(d) is New Tribes Mission, Inc., an organization described in section 501(c)(3) of the Code, and such organizations permitted within the meaning of Reg. §1.509(a)-4(d); and (iv) do not empower the Corporation to operate to support or benefit any organization other than the Supported Organization and such organizations permitted within the meaning of Reg. §1.509(a)-4(d).

(b) Purpose. The Corporation is formed "for the benefit of" (within the meaning of Reg. §1.509(a)-4(c) (2)) the Supported Organization and, as may be permitted herein, such other organizations permitted within the meaning of Reg. § 1.509(a)-4(d).

(c) Limitations. These Articles do not and shall not permit the Corporation to operate, support, or benefit any organization other than the Supported Organization or, as may be permitted herein, such other organizations permitted within the meaning of Reg. § 1.509(a)-4(d).

B. Specified Organizations. The "specified" publicly supported organization on whose behalf the Corporation is to be operated shall be the Supported Organization or, as may be permitted herein, such other organizations permitted within the meaning of Reg. § 1.509(a)-4(d).

C. Nondesignated Publicly Supported Organizations.

(a) General. In the event the Corporation shall benefit an organization other than the Supported Organization, such organizations shall be only those organizations that are of the class to be benefited by the Supported Organization and are consistent with the purposes of the Supported Organization.

(b) Scope. These Articles shall (i) permit the substitution of one publicly supported organization within the same class to be benefited by the Supported Organization and consistent with the purposes of the Supported Organization; (ii) permit the Corporation to operate for the benefit of new or additional publicly supported organizations of the same class to be benefited by the Supported Organization and consistent with the purposes of the Supported Organization; or (iii) permit the Corporation to vary the amount of its support among different publicly supported organizations within the same class as benefited by the Supported Organization and consistent with the purposes of the Supported Organization, but only if the Supported Organization is not permitted by applicable law to receive such support. Otherwise, all support must be paid or otherwise provided to the Supported Organization.

D. Operational Test.

(a) Permissible Beneficiaries. The Corporation shall engage solely in activities that support or benefit the Supported Organization. Such activities may include making payments to or for the use of, or providing services or facilities for, individual members of the charitable class benefited by the Supported Organization; or supporting or benefiting an organization, other than a private foundation that is described in section 501(c)(3) and is operated, supervised, or controlled directly by or in connection with the Supported Organization. No part of the activities of the Corporation shall be in furtherance of a purpose other than supporting or benefiting the Supported Organization.

(b) Permissible Activities. The Corporation shall not be required to pay over its income to the Supported Organization in order to meet the operational test (as defined in Treas. Reg. § 1.509(a)-4(e)). It may satisfy the test by using its income to carry on an independent activity or program that supports or benefits only the Supported Organization; provided, however, that all such support must be limited to permissible beneficiaries under subparagraph (a) of this section D, Article XI.

E. Nature of Relationship between Organizations. The Corporation shall be "supervised or controlled in connection with" the Supported Organization through the presence of common directors, as set forth in the Bylaws of the Corporation.

F. Meaning of "Supervised or Controlled in Connection With". The Corporation shall be under common supervision or control by the persons supervising and controlling the Supported Organization to ensure that the Corporation will be responsive to the needs and requirements of the Supported Organization. Without limiting the foregoing, and to satisfy the requirement that the Corporation be under common supervision or control by the persons supervising and controlling the Supported Organization, a majority of the directors of the Corporation shall also serve as directors of the Supported Organization, as set forth in the Bylaws of the Corporation.

G. Control by Disqualified Persons.

(a) In General. In compliance with Section 509(a)(3)(C), the Corporation may not be controlled directly or indirectly by one or more disqualified persons (as defined in section 4946) other than foundation managers and other than the Supported Organization. If a person is a disqualified person with respect to the Corporation, such as a substantial contributor to the Corporation, is appointed or designated as a foundation manager of the Corporation by the Supported Organization to serve as the representative of the Supported Organization, then for purposes of this paragraph such person will be regarded as a disqualified person, rather than as a representative of the Supported Organization. An organization will be considered "controlled," for purposes of section 509(a)(3)(C), if the disqualified persons, by aggregating their votes or positions of authority, may require such organization to perform any act that significantly affects its operation or may prevent such organization from performing such act. This includes, but is not limited to, the right of any substantial contributor or his spouse to designate annually the recipients, of the income attributable to his contribution to the Corporation. Except as provided in subparagraph (b) of this paragraph, the Corporation will be considered to be controlled directly or indirectly by one or more disqualified persons if the voting power of such persons is 50 percent or more of the total voting power of the organization's governing body or if one or more of such persons have the right to exercise veto power over the actions of the Corporation.

(b) Proof of Independent Control. Notwithstanding subparagraph (a) of this paragraph, the organization is permitted to establish to the satisfaction of the Commissioner of Internal Revenue that the disqualified persons do not directly or indirectly control it.

ARTICLE XII-Limitations to Corporate Power

Any purchase, mortgage, lease, or sale of real estate to any third-party other than New Tribes Mission, Inc. or a supporting organization (as defined under the Code) of New Tribes Mission, Inc. shall require the approval of the board of directors of New Tribes Mission, Inc.

DEC. 11. 2013 4:16PM

NO. 5564 P. 8
FILED
SECRETARY OF STATE
DIVISION OF CORPORATIONS

13 DEC 11 AM 11:04

ARTICLE XIII - Other Provisions

Notwithstanding any other provision set forth in these Articles, at any time during which it is deemed a private foundation, the Corporation shall not engage in any act of self dealing as defined in Section 4941(d) of the Internal Revenue Code of 1986; the Corporation shall distribute its income for each taxable year at such time and in such manner as not to become subject to the tax on undistributed income imposed by Section 4942 of the Internal Revenue Code of 1986; the Corporation shall not own any excess business holdings that would subject it to tax under Section 4943 of the Internal Revenue Code of 1986; the Corporation shall not make any investment in such manner as to subject it to the tax imposed by Section 4944 of the Internal Revenue Code of 1986; and the Corporation shall not make any taxable expenditures as defined in Section 4945(d) of the Internal Revenue Code of 1986. Any reference in these Articles to any section of the Internal Revenue Code of 1986 shall be deemed to incorporate by reference the corresponding provisions of any subsequent federal tax laws.

WHEREOF, the undersigned Incorporator has executed these Articles this 11th day of December, 2013.


Dan Kreider, Incorporator.

DEC. 11. 2013 4:16PM

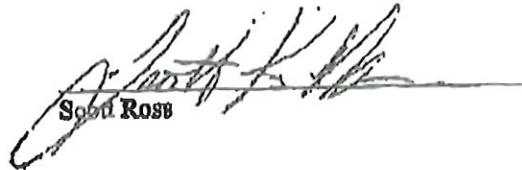
NO. 5564 P. 9

FILED
SECRETARY OF STATE
DIVISION OF CORPORATIONS

13 DEC 11 AM 11:01

ACCEPTANCE OF APPOINTMENT AS REGISTERED AGENT

The undersigned is familiar with the obligations of the registered agent and hereby accepts the appointment to serve as the initial Registered Agent of Global Assist Campus, Inc.


Scott Ross



December 12, 2013

FLORIDA DEPARTMENT OF STATE
Division of Corporations

GLOBAL ASSIST CAMPUS, INC.
1000 E FIRST ST
SANFORD, FL 32771

The Articles of Incorporation for GLOBAL ASSIST CAMPUS, INC. were filed on December 11, 2013, and assigned document number N13000011047. Please refer to this number whenever corresponding with this office.

Enclosed is the certification requested. To be official, the certification for a certified copy must be attached to the original document that was electronically submitted and filed under FAX audit number H13000271956.

To maintain "active" status with the Division of Corporations, an annual report must be filed yearly between January 1st and May 1st beginning in the year following the file date or effective date indicated above. It is your responsibility to remember to file your annual report in a timely manner.

A Federal Employer Identification Number (FEI/EIN) will be required when this report is filed. Contact the IRS at 1-800-829-4933 for an SS-4 form or go to www.irs.gov.

Please be aware if the corporate address changes, it is the responsibility of the corporation to notify this office.

Should you have questions regarding corporations, please contact this office at (850) 245-6052.

Pamela Smith
Regulatory Specialist II
New Filings Section
Division of Corporations

Letter Number: 613A00028268

P.O BOX 6327 -- Tallahassee, Florida 32314



State of Florida

Department of State

I certify from the records of this office that GLOBAL ASSIST CAMPUS, INC. is a corporation organized under the laws of the State of Florida, filed on December 11, 2013.

The document number of this corporation is N13000011047.

I further certify that said corporation has paid all fees due this office through December 31, 2013, and its status is active.

I further certify that said corporation has not filed Articles of Dissolution.

I further certify that this is an electronically transmitted certificate authorized by section 15.16, Florida Statutes, and authenticated by the code, 613A00028268-121213-N13000011047-1/1, noted below.

Authentication Code: 613A00028268-121213-N13000011047-1/1

Given under my hand and the
Great Seal of the State of Florida,
at Tallahassee, the Capital, this the
Twelfth day of December, 2013



Ken Detzner
Ken Detzner
Secretary of State