



ARTICLES OF INCORPORATION
OF
THE GAFFOOR FOUNDATION

For Office Use Only

-FILED-

File No.: 6452254

Date Filed: 11/4/2024

ARTICLE I
Corporate Name

The name of the corporation (the "Corporation") is: The Gaffoor Foundation.

ARTICLE II
Corporate Purpose

Section 2.01. Corporate Form and Purpose. This Corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for charitable purposes.

Section 2.02. Exempt Purpose. This Corporation is organized and operated exclusively for religious, charitable, scientific, literary, and educational purposes within the meaning of Internal Revenue Code (the "Code") § 501(c)(3) (or the corresponding provision of any future federal tax law). This Corporation will hold, invest, and administer assets received as charitable gifts, bequests, and contributions, and use such assets, or the income therefrom, to make grants, loans, and other distributions in furtherance of this Corporation's religious, charitable, scientific, literary, and educational purposes, including, without limitation, to support the activities and projects of other organizations operated exclusively for charitable, religious, scientific, literary, or educational purposes.

ARTICLE III
Service of Process

The name and California street address of this Corporation's initial agent for service of process are:

Casey S. Hale
Brown & Streza LLP
40 Pacifica, Suite 1500
Irvine, CA 92618

ARTICLE IV
Corporate Address

The initial street and mailing address of this Corporation is:

10745 Equestrian Drive
Santa Ana, CA 92705

B3154-1551 11/04/2024 5:00 PM Received by California Secretary of State

ARTICLE V

Membership

This Corporation will have members. The authorized number, qualification, and classes of members, if any, and their rights, preferences, privileges, and restrictions will be set forth in the Corporation's bylaws.

ARTICLE VI

Duration

The Corporation's duration is perpetual.

ARTICLE VII

Powers

This Corporation is a nonprofit public benefit corporation and has all of the powers, duties, authorizations, and responsibilities as provided in the Nonprofit Public Benefit Corporation Law. Notwithstanding any other provision of these Articles, this Corporation may not, except to an insubstantial degree, engage in any activities or exercise any powers that are not in furtherance of the purposes of the Corporation. Notwithstanding any other provision in these Articles, this Corporation may not carry on any other activities not permitted to be carried on by a corporation exempt from federal income tax under Code § 501(c)(3) or by a corporation contributions to which are deductible under Code § 170(c)(2).

ARTICLE VIII

Private Foundation Status

Notwithstanding any other provision of these Articles of Incorporation, as long as this Corporation is, or is determined to be, a private foundation as described in Code § 509(a), then this Corporation must distribute assets in each taxable year at the time and in a manner that will avoid tax under Code § 4942(b), and this Corporation is expressly prohibited from engaging in any act of self-dealing as defined in Code § 4941(d), from retaining any excess business holdings as defined in Code § 4943(c), from making any investments in a manner that will subject the Corporation to tax under Code § 4944, and from making any taxable expenditures as defined in Code § 4945(d).

ARTICLE IX

Tax-Exempt Status

Section 9.01. Political Activities. No substantial part of the activities of this Corporation may consist of carrying on propaganda or otherwise attempting to influence legislation, and this Corporation may not participate or intervene in any political campaign (including the publishing or distribution of statements) on behalf of any candidate for public office.

Section 9.02. Private Inurement. The property of this Corporation is irrevocably dedicated to religious, charitable, scientific, literary, and educational purposes and no part of the net income or assets of this Corporation will ever inure to the benefit of any director, officer, or member thereof or to the benefit of any private person.

Section 9.03. Dissolution. Upon the dissolution or winding up of this Corporation, its assets remaining after payment, or provision for payment, of all debts and liabilities of this Corporation will be distributed to a nonprofit fund, foundation, or corporation that is organized and operated exclusively for charitable, educational, and and/or religious purposes and which has established its tax-exempt status under Code § 501(c)(3).

Dated: October 30, 2024

F. M. L.
Fahiem Gaffoor, Incorporator