Form **1023**

(Rev. January 2020)

Department of the Treasury
Internal Revenue Service

Application for Recognition of Exemption
Under Section 501(c)(3) of the Internal Revenue Code

Do not enter social security numbers on this form as it may be made public.

Go to www.irs.gov/Form1023 for instructions and the latest information.

OMB No. 1545-0047

Note: *If exempt status is approved, this application will be open for public inspection.*

Use the "?" buttons throughout this form for help in completing this application. For additional help, call IRS Exempt Organizations Customer Account Services toll-free at 1-877-829-5500.

If you cannot complete required responses within the textbox limits throughout this form, upload your additional narratives with the other required documents.

Part I Identification of Applicant

1a Full Name of Organization (exactly as it appears in your organizing document)	b Care of Name (if applicable)
TIPPECANOE EMERGENCY AMBULANCE SERVICES INC	

c Mailing Address (Number, street and room/suite)	d City	e Country
1701 SOUTH CREASY LANE	LAFAYETTE	United States

f State	g Zip Code + 4	h Foreign Province (or State)	i Foreign Postal Code
Indiana	47904		

2 Employer Identification Number	3 Month Tax Year Ends	4 Person to Contact if More Information is Needed (officer, director, trustee, or authorized representative)
46-3253742	DECEMBER	ERIC MCNEIL

5 Contact Telephone Number	6 Fax Number (optional)	7 User Fee Submitted
267-977-0790	765-423-6608	$600.00

8 Organization's Website (if available): www.franciscanhealth.org

9 List the names, titles, and mailing addresses of your officers, directors, and/or trustees.

First Name: DANIEL	Last Name: WICKERT MD	Title: CHAIRPERSON/DIRECTOR
Mailing Address: 1701 SOUTH CREASY LANE	City: LAFAYETTE	
State (or Province): IN	Zip Code (or Foreign Postal Code): 47905	
First Name: CHRISTOPHER	Last Name: MANSFIELD MD	Title: VICE CHAIR./DIRECTOR
Mailing Address: 5165 MCCARTY LANE	City: LAFAYETTE	
State (or Province): IN	Zip Code (or Foreign Postal Code): 47905	
First Name: JAMES	Last Name: SIEMERS	Title: SECRETARY/DIRECTOR
Mailing Address: 1701 SOUTH CREASY LANE	City: LAFAYETTE	
State (or Province): IN	Zip Code (or Foreign Postal Code): 47905	
First Name: TODD	Last Name: WILLIAMS	Title: TREASURER/DIRECTOR
Mailing Address: 5165 MCCARTY LANE	City: LAFAYETTE	
State (or Province): IN	Zip Code (or Foreign Postal Code): 47905	
First Name: TOM	Last Name: MURTAUGH	Title: CLASS B DIRECTOR
Mailing Address: 20 NORTH 3RD STREET	City: LAFAYETTE	
State (or Province): IN	Zip Code (or Foreign Postal Code): 47901	

☐ Check here to add more officers, directors, and/or trustees.

Brian Alkire - Class C Director, 443 North 4th Street, Lafayette, IN 47901. Jeff Need - Class C Director, 300 North Street, Lafayette, IN 47906.

Part II Organizational Structure

1 You must be a corporation, limited liability company (LLC), unincorporated association, or trust to be tax exempt.

Select your type of organization.

(●) Corporation

At the end of this form, you must upload a copy of your articles of incorporation (and any amendments) that shows proof of filing with the appropriate state agency.

( ) Limited Liability Company (LLC)

At the end of this form, you must upload a copy of your articles of organization (and any amendments) that shows proof of filing with the appropriate state agency. Also, if you adopted an operating agreement, upload a copy, along with any amendments.

( ) Unincorporated Association

At the end of this form, you must upload a copy of your articles of association, constitution, or other similar organizing document that is dated and includes at least two signatures. Include signed and dated copies of any amendments.

( ) Trust

At the end of this form, you must upload a signed and dated copy of your trust agreement. Include signed and dated copies of any amendments.

2 Enter the date you formed. (MM/DD/YYYY) 04/26/2013

3 Select your state (or U.S. territory) of incorporation or other formation. If you were formed under the laws of a foreign country, select Foreign Country. Indiana

4 Have you adopted bylaws? If "Yes," at the end of this form, upload a current copy showing the date of adoption. If "No," explain how you select your officers, directors, or trustees. (●) Yes ( ) No

5 Are you a successor to another organization? ( ) Yes (●) No

Answer "Yes" if you have taken or will take over the activities of another organization, you took over 25% or more of the fair market value of the net assets of another organization, or you were established upon the conversion of an organization from for-profit to nonprofit status. If "Yes," complete Schedule G.

Part III Required Provisions in Your Organizing Document

Part III helps ensure that, when you submit this application, your organizing document contains the required provisions to meet the organizational test under section 501(c)(3).

If you cannot check "Yes" in both Lines 1 and 2, your organizing document does not meet the organizational test. DO NOT file this application until you have amended your organizing document. Remember to upload your original and amended organizing documents at the end of this form.

1 Section 501(c)(3) requires that your organizing document limit your purposes to one or more exempt purposes within section 501(c)(3), such as charitable, religious, educational, and/or scientific purposes.

The following is an example of an acceptable purpose clause: The organization is organized exclusively for charitable, religious, educational, and scientific purposes under section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code.

Does your organizing document meet this requirement? (●) Yes ( ) No

1a State specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document (Page/Article/Paragraph):

PAGE 2, ARTICLE II, SECTION 4

2 Section 501(c)(3) requires that your organizing document provide that upon dissolution, your remaining assets be used exclusively for section 501(c)(3) exempt purposes, such as charitable, religious, educational, and/or scientific purposes. Depending on your entity type and the state in which you are formed, this requirement may be satisfied by operation of state law.

The following is an example of an acceptable dissolution clause: Upon the dissolution of this organization, assets 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.

Does your organizing document meet this requirement? (●) Yes ( ) No

2a State specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document (Page/Article/Paragraph) or indicate that you rely on state law.

PAGE 3, ARTICLE VII

Part IV Your Activities

1 Describe completely and in detail your past, present, and planned activities. Do not refer to or repeat the purposes in your organizing document.

For each past, present, or planned activity, include information that answers the following questions:

a. What is the activity?
b. Who conducts the activity?
c. Where is the activity conducted?
d. What percentage of your total time is allocated to the activity?
e. How is the activity funded (for example, donations, fees, etc.) and what percentage of your overall expenses is allocated to this activity?
f. How does the activity further your exempt purposes?

See attached statement.

Part IV **Your Activities** *(continued)*

2 Enter the 3-character NTEE Code that best describes your activities.

Or check here if you want the IRS to select the NTEE Code that best describes your activities. ☐

3 Do any of your programs limit the provision of goods, services, or funds to a specific individual or group of specific individuals? For example, answer "Yes" if goods, services, or funds are provided only for a particular individual, your members, individuals who work for a particular employer, or graduates of a particular school. If "Yes," explain the limitation and how recipients are selected for each program. ○ Yes ◉ No

4 Do any individuals who receive goods, services, or funds through your programs have a family or business relationship with any officer, director, trustee, or with any of your highest compensated employees or highest compensated independent contractors? If "Yes," explain how these related individuals are eligible for goods, services, or funds. ○ Yes ◉ No

5 Do you or will you support or oppose candidates in political campaigns in any way? If "Yes," explain. ○ Yes ◉ No

6 Do you or will you attempt to influence legislation? If "Yes," explain how you attempt to influence legislation. ○ Yes ◉ No

Part IV **Your Activities** *(continued)*

6a Did you or will you make an election to have your legislative activities measured by expenditures by filing Form 5768? If "No," describe whether your attempts to influence legislation are a substantial part of your activities. Include the time and money spent on your attempts to influence legislation as compared to your total activities. ○ Yes ○ No

7 Do you or will you publish, own, or have rights in music, literature, tapes, artworks, choreography, scientific discoveries, or other intellectual property? If "Yes," describe who owns or will own any copyrights, patents, or trademarks, whether fees are or will be charged, how the fees are determined, and how any items are or will be produced, distributed, and marketed. ○ Yes ◉ No

8 Do you or will you provide educational information to the general public on budgeting, personal finance, financial literacy, saving and spending practices, the sound use of consumer credit, and/or assist individuals and families with financial problems such as credit card debt and foreclosure by providing them with counseling? If "Yes," explain. ○ Yes ◉ No

9 Do you or will you make grants, loans, or other distributions to organizations? If "Yes," describe the type and purpose of the grants, loans, or distributions, how you select your recipients including submission requirements (such as grant proposals or application forms), and the criteria you use or will use to select recipients. Also describe how you ensure the grants, loans, and other distributions are or will be used for their intended purposes (including whether you require periodic or final reports on the use of funds and any procedures you have if you identify that funds are not being used for their intended purposes). Finally, describe the records you keep with respect to grants, loans, or other distributions you make and identify any recipient organizations and any relationships between you and the recipients. If "No," continue to Line 10. ○ Yes ◉ No

Part IV **Your Activities** *(continued)*

9a Do you or will you make grants, loans, or other distributions to organizations that are not recognized by the IRS as tax exempt under section 501(c)(3)? If "Yes," name and/or describe the non-section 501(c)(3) organizations to whom you do or will make distributions and explain how these distributions further your exempt purposes. ◯ Yes ◯ No

9b Do you or will you make grants, loans, or other distributions to foreign organizations? If "Yes," name each foreign organization (if not already provided), the country and region within each country in which each foreign organization operates, any relationship you have with each foreign organization, and whether the foreign organization accepts contributions earmarked for a specific country or organization (if so, specify which countries or organizations). If "No," continue to Line 10. ◯ Yes ◯ No

9c Do your contributors know that you have ultimate authority to use contributions made to you at your discretion for purposes consistent with your exempt purposes? If "Yes," describe how you relay this information to contributors. ◯ Yes ◯ No

9d Do you or will you make pre-grant inquiries about the recipient organization? If "Yes," describe these inquiries, including whether you inquire about the recipient's financial status, its tax-exempt status under the Internal Revenue Code, its ability to accomplish the purpose for which the resources are provided, and other relevant information. ◯ Yes ◯ No

9e Do you or will you use any additional procedures to ensure that your distributions to foreign organizations are used in furtherance of your exempt purposes? If "Yes," describe these procedures, including periodic reporting requirements, auditing grantees, site visits by your employees or compliance checks by impartial experts, etc., to verify that grant funds are being used appropriately. ◯ Yes ◯ No

Part IV **Your Activities** *(continued)*

9f Do you share board members or other key personnel with the recipient organization(s)? If "Yes," identify the relationships. ◯ Yes ◯ No

9g When you make grants, loans, or other distributions to foreign organizations, will you check the OFAC List of Specially Designated Nationals and Blocked Persons for names of individuals and entities with whom you are dealing to determine if they are included on the list? Describe any other practices you will engage in to ensure that foreign expenditures or grants are not diverted to support terrorism or other non-charitable activities. ◯ Yes ◯ No

9h Will you comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in violation of economic sanctions administered by OFAC? ◯ Yes ◯ No

9i Will you acquire from OFAC the appropriate license and registration where necessary? ◯ Yes ◯ No

10 Do you or will you operate in a foreign country or countries? If "Yes," name each foreign country and region within each country in which you do or will operate and describe your operations in each one. If "No," continue to Line 11. ◯ Yes ◉ No

10a When you conduct activities in foreign countries, will you check the OFAC List of Specially Designated Nationals and Blocked Persons for names of individuals and entities with whom you are dealing to determine if they are included on the list? Describe any other practices you will engage in to ensure that foreign expenditures or grants are not diverted to support terrorism or other non-charitable activities. ◯ Yes ◯ No

10b Will you comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in violation of economic sanctions administered by OFAC? ◯ Yes ◯ No

10c Will you acquire from OFAC the appropriate license and registration where necessary? ◯ Yes ◯ No

Part IV **Your Activities** *(continued)*

11 Are you a sponsoring organization that maintains one or more donor advised funds? If yes, please provide a complete description of your program, including the specific advice that such donors may provide. Describe in detail the control you maintain (or will maintain) over the use of the funds. ○ Yes ◉ No

12 Do you or will you operate a school? If "Yes," complete Schedule B. ○ Yes ◉ No

13 Is your principal purpose or function to provide hospital or medical care? If "Yes," complete Schedule C. ○ Yes ◉ No

14 Do you or will you provide low-income housing? If "Yes," complete Schedule F. ○ Yes ◉ No

15 Do you or will you provide scholarships, fellowships, educational loans, or other educational grants to individuals, including grants for travel, study, or other similar purposes? If "Yes," complete Schedule H - Section I. ○ Yes ◉ No

16 Check any of the following fundraising activities that you will undertake (check all that apply):

- ☐ Website, mail, email, personal, and/or phone solicitations
- ☐ Receive donations from another organization's website
- ☐ Bingo
- ☐ Other (describe)
- ☐ Foundation grant solicitations
- ☐ Government grant solicitations
- ☐ Other (non-bingo) gaming activities
- ■ We will not engage in fundraising activities.

17 Do you or will you engage in fundraising activities for other organizations? If "Yes," describe these arrangements, including the names or descriptions of the organizations for which you raise funds. ○ Yes ◉ No

Part V Compensation and Other Financial Arrangements

1 Do you or will you compensate officers, directors, or trustees, or do or will you have highest compensated employees, or highest compensated independent contractors? If "No," continue to Line 2. (●) Yes ( ) No

In establishing compensation for your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors:

1a Do or will the individuals that approve compensation arrangements follow a conflict of interest policy? (●) Yes ( ) No

1b Do or will you approve compensation arrangements in advance of paying compensation? (●) Yes ( ) No

1c Do or will you document in writing the date and terms of approved compensation arrangements? (●) Yes ( ) No

1d Do or will you record in writing the decision made by each individual who decided or voted on compensation arrangements? (●) Yes ( ) No

1e Do or will you approve compensation arrangements based on information about compensation paid by similarly situated taxable or tax-exempt organizations for similar services, current compensation surveys compiled by independent firms, or actual written offers from similarly situated organizations? (●) Yes ( ) No

1f Do or will you record in writing both the information on which you relied to base your decision and its source? (●) Yes ( ) No

1g Do or will you have any other practices you use to set reasonable compensation? If "Yes," describe these practices. ( ) Yes (●) No

2 Have you adopted a conflict of interest policy consistent with the sample conflict of interest policy in Appendix A to the instructions? If you are a hospital, answer "Yes" if your conflict of interest policy includes provisions consistent with the additional healthcare related provisions in the sample document. If "No," describe the procedures you will follow to ensure that persons who have a conflict of interest will not have influence over setting their own compensation or regarding business deals with themselves. (●) Yes ( ) No

3 Do you or will you compensate any of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors through non-fixed payments, such as discretionary bonuses or revenue-based payments? If "Yes," describe all non-fixed compensation arrangements, including how the amounts are determined, who is eligible for such arrangements, whether you place a limitation on total compensation, and how you determine or will determine that you pay no more than reasonable compensation for services. ( ) Yes (●) No

Part V **Compensation and Other Financial Arrangements** *(continued)*

4 Do you or will you purchase or sell any goods, services, or assets from or to: (i) any of your officers, directors, or trustees; (ii) any family of any of your officers, directors, or trustees; (iii) any organizations in which any of your officers, directors, or trustees are also officers, directors, or trustees, or in which any individual officer, director, or trustee owns more than a 35% interest; (iv) your highest compensated employees; or (v) your highest compensated independent contractors? If "Yes," describe any such transactions that you made or intend to make, with whom you make or will make such transactions, how the terms are or will be negotiated at arm's length, and how you determine you pay no more than fair market value or you are paid at least fair market value.

◉ Yes ○ No

TEAS contracts with service providers, including its members, for shared services in furtherance of its charitable purposes. All agreements will be negotiated at arms length and for fair value.

5 Do you or will you have any leases, contracts, loans, or other agreements with: (i) your officers, directors, or trustees; (ii) any family of any of your officers, directors, or trustees; (iii) any organizations in which any of your officers, directors, or trustees are also officers, directors, or trustees, or in which any individual officer, director, or trustee owns more than a 35% interest; (iv) your highest compensated employees; or (v) your highest compensated independent contractors? If "Yes," describe any written or oral arrangements that you made or intend to make, with whom you have or will have such arrangements, how the terms are or will be negotiated at arm's length, and how you determine you pay no more than fair market value or you are paid at least fair market value.

○ Yes ◉ No

6 Do you or will you contract with another organization to develop, build, market, or finance your facilities? If "Yes," describe each facility, the role of the other organization, and any business or family relationship between the organization and your officers, directors, or trustees. Explain how that entity is selected, how the terms of any contract(s) are negotiated at arm's length, and how you determine you will pay no more than fair market value for services.

○ Yes ◉ No

Part V Compensation and Other Financial Arrangements *(continued)*

7 Does or will someone other than your own employees or volunteers manage your activities or facilities? ○ Yes ◉ No

If "Yes," describe the activities or facilities that will be managed by others, the names of the persons or organizations that manage or will manage your activities or facilities, and any business or family relationship between the organization and your officers, directors, or trustees. Explain how these managers were or will be selected, how the terms of any contracts or other agreements were or will be negotiated, and how you determine you will pay no more than fair market value for services.

8 Do you participate in any joint ventures, including partnerships or limited liability companies treated as partnerships, in which you share profits and losses with partners? If "Yes," state your ownership percentage in each joint venture, list your investment in each joint venture, describe the tax status of other participants in each joint venture (including whether they are section 501(c)(3) organizations), describe the activities of each joint venture, describe how you exercise control over the activities of each joint venture, and describe how each joint venture furthers your exempt purposes. ○ Yes ◉ No

Part VI Financial Data

1 Select the option that best describes you to determine the years of revenues and expenses you need to provide.

○ You completed less than one tax year.

Provide a total of three years of financial information (including the current year and two future years of reasonable and good faith projections of your future finances) in the following Statement of Revenues and Expenses.

○ You completed at least one tax year but fewer than five.

Provide a total of four years financial information (including the current year and three years of actual financial information or reasonable and good faith projections of your future finances) in the following Statement of Revenues and Expenses.

◉ You completed five or more tax years.

Provide financial information for your five most recent tax years (including the current year) in the following Statement of Revenues and Expenses.

Part VI **Financial Data** *(continued)*

A. Statement of Revenues and Expenses

Type of revenue	Current tax year	4 prior tax years or 2 succeeding tax years			
	From: 01/01/2024 To: 12/31/2024	From: 01/01/2025 To: 12/31/2025	From: 01/01/2026 To: 12/31/2026	From: 01/01/2027 To: 12/31/2027	From: 01/01/2028 To: 12/31/2028
1 Gifts, grants, and contributions received (do not include unusual grants)					
2 Membership fees received					
3 Gross investment income					
4 Net unrelated business income					
5 Taxes levied for your benefit					
6 Value of services or facilities furnished by a governmental unit without charge (not including the value of services generally furnished to the public without charge)					
7 Any revenue not otherwise listed above or in lines 9 - 12 below (provide an itemized list below)					
8 Total of lines 1 through 7	$0.	$0.	$0.	$0.	$0.
9 Gross receipts from admissions, merchandise sold or services performed, or furnishing of facilities in any activity that is related to your exempt purposes (provide an itemized list below)	$6,340,000.	$6,599,000.	$6,599,000.	$6,599,000.	$6,599,000.
10 Total of lines 8 and 9	$6,340,000.	$6,599,000.	$6,599,000.	$6,599,000.	$6,599,000.
11 Net gain or loss on sale of capital assets (provide an itemized list below)					
12 Unusual grants (provide an itemized list below)					
13 Total Revenue (add lines 10 through 12)	$6,340,000.	$6,599,000.	$6,599,000.	$6,599,000.	$6,599,000.
Type of expense	**Current tax year**	**4 prior tax years or 2 succeeding tax years**			
14 Fundraising expenses					
15 Contributions, gifts, grants, and similar amounts paid out (provide an itemized list below)					
16 Disbursements to or for the benefit of members (provide an itemized list below)					
17 Compensation of officers, directors, and trustees					
18 Other salaries and wages					
19 Interest expense					
20 Occupancy (rent, utilities, etc.)					
21 Depreciation and depletion	$370,000.	$416,000.	$416,000.	$416,000.	$416,000.
22 Professional fees	$4,321,000.	$4,321,000.	$4,321,000.	$4,321,000.	$4,321,000.
23 Any expense not otherwise classified, such as program services (provide an itemized list below)	$1,350,000.	$1,377,000.	$1,403,000.	$1,431,000.	$1,459,000.
24 Total Expenses (add lines 14 through 23)	$6,041,000.	$6,114,000.	$6,140,000.	$6,168,000.	$6,196,000.

25 Itemized financial data

TEAS has had zero activity since its incorporation in 2013. As a result, TEAS is presenting the projected activity for 2024 - 2028. Please see attached exhibit for itemized financial data.

Part VI **Financial Data** *(continued)*

B. Balance Sheet (for your most recently completed tax year)	Year End: 12/31/2023
Assets	
1 Cash	$0.
2 Accounts receivable, net	$0.
3 Inventories	
4 Bonds and notes receivable (provide an itemized list below)	
5 Corporate stocks (provide an itemized list below)	
6 Loans receivable (provide an itemized list below)	
7 Other investments (provide an itemized list below)	
8 Depreciable assets (provide an itemized list below)	$0.
9 Land	
10 Other assets (provide an itemized list below)	
11 Total Assets (add lines 1 through 10)	$0.
Liabilities	
12 Accounts payable	$0.
13 Contributions, gifts, grants, etc. payable	
14 Mortgages and notes payable (provide an itemized list below)	
15 Other liabilities (provide an itemized list below)	
16 Total Liabilities (add lines 12 through 15)	$0.
Fund Balances or Net Assets	
17 Total fund balances or net assets	$0.
18 Total Liabilities and Fund Balances or Net Assets (add lines 16 and 17)	$0.

19 Itemized financial data

Part VII Foundation Classification

Part VII is designed to classify you as an organization that is either a private foundation or a public charity. Public charity classification is a more favorable tax status than private foundation classification. If you are a private foundation, this part will further determine whether you are a private operating foundation.

1 Select the foundation classification you are requesting from the list below.

- ☐ You are described in 509(a)(1) and 170(b)(1)(A)(vi) as an organization that receives a substantial part of its financial support in the form of contributions from publicly supported organizations, from a governmental unit, or from the general public.
- ■ You are described in 509(a)(2) as an organization that normally receives not more than one-third of its financial support from gross investment income and receives more than one-third of its financial support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions).
- ☐ You are described in 509(a)(1) and 170(b)(1)(A)(i) as a church or a convention or association of churches. Complete Schedule A.
- ☐ You are described in 509(a)(1) and 170(b)(1)(A)(ii) as a school. Complete Schedule B.
- ☐ You are described in 509(a)(1) and 170(b)(1)(A)(iii) as a hospital, a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital. Complete Schedule C.
- ☐ You are described in 509(a)(1) and 170(b)(1)(A)(iv) as an organization operated for the benefit of a college or university that is owned or operated by a governmental unit.
- ☐ You are described in 509(a)(1) and 170(b)(1)(A)(ix) as an agricultural research organization directly engaged in the continuous active conduct of agricultural research in conjunction with a college or university.
- ☐ You are described in 509(a)(3) as an organization supporting either one or more organizations described in 509(a)(1) or 509(a)(2) or a publicly supported section 501(c)(4), (5), or (6) organization. Complete Schedule D.
- ☐ You are described in 509(a)(4) as an organization organized and operated exclusively for testing for public safety.
- ☐ You are a publicly supported organization and would like the IRS to decide your correct classification.
- ☐ You are a private foundation.

1a As a private foundation, section 508(e) requires special provisions in your organizing document in addition to those that apply to all organizations described in section 501(c)(3). Check this box to confirm that your organizing document includes these provisions or you rely on state law. ☐

State specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document (Page/Article/Paragraph) or state that you rely on state law.

1b Do you or will you provide scholarships, fellowships, educational loans, or other educational grants to individuals, including grants for travel, study, or other similar purposes? ○ Yes ○ No
If "Yes," complete Schedule H - Section II.

1c Are you a private operating foundation? ○ Yes ○ No

To be a private operating foundation you must engage directly in the active conduct of charitable, religious, educational, and similar activities, as opposed to indirectly carrying out these activities by providing grants to individuals or other organizations.

Part VII Foundation Classification *(continued)*

1d Describe how you meet the requirements for private operating foundation status, including how you meet the income test and either the assets test, the endowment test, or the support test. If you've been in existence for less than one year, describe how you are likely to satisfy the requirements for private operating foundation status.

2 If you have been in existence more than 5 years, you must confirm your public support status. To confirm your qualification as a public charity described in 509(a)(1) and 170(b)(1)(A)(vi) in existence for five or more tax years, you must have received one-third or more of your total support from governmental agencies, contributions from the general public, and contributions or grants from other public charities; or 10% or more of your total support from governmental agencies, contributions from the general public, and contributions or grants from other public charities and the facts and circumstances indicate you are a publicly supported organization. Calculate whether you meet this support test for your most recent five-year period.

i. Did you receive contributions from any person, company, or organization whose gifts totaled more than the 2% amount of line 8 in Part VI-A? ○ Yes ○ No

If "Yes," identify each person, company, or organization by letter (A, B, C, etc.) and indicate the amount contributed by each. Keep a list showing the name of and amount contributed by each of these donors for your records.

ii. Based on your calculations, did you receive at least one-third of your support from public sources or did you normally receive at least 10 percent of your support from public sources and you have other characteristics of a publicly supported organization? ○ Yes ○ No

2a If you have been in existence more than 5 years, you must confirm your public support status. To confirm your qualification as a public charity described in 509(a)(2) in existence for five or more tax years, you must have normally received more than one-third of your support from contributions, membership fees, and gross receipts from activities related to your exempt functions, or a combination of these sources, and not more than one-third of your support from gross investment income and net unrelated business income. Calculate whether you meet this support test for your most recent five-year period.

i. Did you receive amounts from any disqualified persons? ○ Yes ◉ No

If "Yes," identify each disqualified person by letter (A, B, C, etc.) and indicate the amount contributed by each. Keep a list showing the name of and amount contributed by each of these donors for your records.

ii. Did you receive amounts from individuals or organizations other than disqualified persons that exceeded the greater of $5,000 or 1% of the amount on line 10 of Part VI-A Statement of Revenues and Expenses? ○ Yes ◉ No

If "Yes," identify each individual or organization by letter (A, B, C, etc.) and indicate the amount contributed by each. Keep a list showing the name of and amount contributed by each of these donors for your records.

iii. Based on your calculations, did you normally receive more than one-third of your support from a combination of gifts, grants, contributions, membership fees, and gross receipts (from permitted sources) from activities related to your exempt functions and normally receive not more than one-third of your support from investment income and unrelated business taxable income? ◉ Yes ○ No

Part VIII Effective Date

In general, a determination letter recognizing exemption of an organization described in section 501(c)(3) is effective as of the date of formation of an organization if: (1) its purposes and activities prior to the date of the determination letter have been consistent with the requirements for exemption; and (2) it has filed an application for recognition of exemption within 27 months from the end of the month in which it was organized.

1 Are you submitting this application within 27 months of the end of the month in which you were legally formed? ☐ Yes ■ No

If "No," complete Schedule E.

Part IX Annual Filing Requirements

If you fail to file a required information return or notice for three consecutive years, your exempt status will be automatically revoked.

1 Certain organizations are not required to file annual information returns or notices (Form 990, Form 990-EZ, or Form 990-N, e-Postcard). If you are granted tax-exemption, are you claiming to be excused from filing Form 990, Form 990-EZ, or Form 990-N? ☐ Yes ■ No

If "Yes," are you claiming you are excepted from filing because you are:

- ☐ A church or association of churches
- ☐ An integrated auxiliary (such as a men's or women's organization, religious school, mission society, or religious group)
- ☐ A church-affiliated organization (other than a section 509(a)(3) organization) that is exclusively engaged in managing funds or maintaining retirement programs and is described in Revenue Procedure 96-10, 1996-1 C.B. 577
- ☐ A school below college level affiliated with a church or operated by a religious order
- ☐ A mission society (other than a section 509(a)(3) supporting organization) sponsored by, or affiliated with, one or more churches or church denominations, if more than half of the society's activities are conducted in, or directed at, persons in foreign countries
- ☐ An affiliate of a governmental unit that meets the requirements of Revenue Procedure 95-48, 1995-2 C.B. 418 (other than a section 509(a)(3) supporting organization)
- ☐ Other (describe)

Part X Signature

☐ I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and that I have examined this application, and to the best of my knowledge it is true, correct, and complete.

(Type name of signer)

(Type title or authority of signer)

03/29/2024

(Date)

Upload checklist:

- [x] Organizing document (and any amendments)
- [x] Bylaws, if adopted
- [x] Form 2848, Power of Attorney and Declaration of Representative (if applicable)
- [ ] Form 8821, Tax Information Authorization (if applicable)
- [ ] Supplemental responses (if applicable)
- [ ] Expedited handling request (if applicable)

Schedule A. Churches

1 Do you have a written creed, statement of faith, or summary of beliefs? If "Yes," describe your written creed, statement of faith, or summary of beliefs. ◯ Yes ◯ No

2 Do you have a literature of your own? If "Yes," describe your literature. ◯ Yes ◯ No

3 Do you have a formal code of doctrine and discipline? If "Yes," describe your code of doctrine and discipline. ◯ Yes ◯ No

4 Describe your religious hierarchy or ecclesiastical government.

5 Are you part of a group of churches with similar beliefs and structures? If "Yes," explain. ◯ Yes ◯ No

6 Do you have a form of worship? If "Yes," describe your form of worship. ◯ Yes ◯ No

7 Do you have regularly scheduled religious services? If "Yes," describe the nature of the services. ◯ Yes ◯ No

7a What is the average attendance at your regularly scheduled religious services?

8 Do you have an established place of worship? If "Yes," describe your established place of worship or where you meet to hold regularly scheduled religious services. ◯ Yes ◯ No

Schedule A. Churches *(continued)*

9 Do you have an established congregation or other regular membership group? If "No," continue to Line 10. ◯ Yes ◯ No

9a How many members do you have?

9b Do you have a process by which an individual becomes a member? If "Yes," describe the process. ◯ Yes ◯ No

9c Do your members have voting rights, rights to participate in religious functions, or other rights? If "Yes," describe the rights your members have. ◯ Yes ◯ No

9d May your members be associated with another denomination or church? ◯ Yes ◯ No

9e Are all of your members part of the same family? ◯ Yes ◯ No

10 Do you conduct baptisms, weddings, funerals, or other religious rites? ◯ Yes ◯ No

11 Do you have a school for the religious instruction of the young? ◯ Yes ◯ No

12 Do you have ministers or religious leaders? If "Yes," describe these roles and explain whether the ministers or religious leaders are ordained, commissioned, or licensed after a prescribed course of study. ◯ Yes ◯ No

13 Do you have schools for the preparation of your ordained ministers or religious leaders? ◯ Yes ◯ No

14 Do you ordain, commission, or license ministers or religious leaders? If "Yes," describe the requirements for ordination, commission, or licensure. ◯ Yes ◯ No

15 Do you have other information you believe should be considered regarding your status as a church? If "Yes," explain. ◯ Yes ◯ No

Schedule B. Schools, Colleges, and Universities

1 Do you normally have a regularly scheduled curriculum, a regular faculty of qualified teachers, a regularly enrolled student body, and facilities where your educational activities are regularly carried on? ◯ Yes ◯ No

2 Is the primary function of your school the presentation of formal instruction? If "No," continue to Line 3. ◯ Yes ◯ No

2a Select the best description(s) of your school:

- ☐ Elementary school
- ☐ Secondary school
- ☐ Charter school
- ☐ College or university
- ☐ Technical school
- ☐ Other school (describe)

3 Are you a public school because you are operated by a state or subdivision of a state or operated wholly or predominantly from government funds or property? If "Yes," explain how you are operated by a state or subdivision of a state. Do not complete the remainder of Schedule B. ◯ Yes ◯ No

4 Were you formed or substantially expanded at the time of public school desegregation in the school district or county in which you are located? ◯ Yes ◯ No

5 Has a state or federal administrative agency or judicial body ever determined that you are racially discriminatory? If "Yes," explain. ◯ Yes ◯ No

6 Has your right to receive financial aid or assistance from a governmental agency ever been revoked or suspended? If "Yes," explain. ◯ Yes ◯ No

Information Required by Revenue Procedure 75-50 as Modified by Revenue Procedure 2019-22

7 Have you adopted a racially nondiscriminatory policy as to students in your organizing document, bylaws, or by resolution of your governing body? ◯ Yes ◯ No

State where the policy is located or if adopted by resolution of your governing body.

8 Do your brochures, application forms, advertisements, and catalogues dealing with student admissions, programs, and scholarships contain a statement of your racially nondiscriminatory policy? If "Yes," continue to Line 9. ◯ Yes ◯ No

8a ☐ By checking this box, you agree that all future printed materials, including website content, will contain the required nondiscriminatory policy statement.

Schedule B. Schools, Colleges, and Universities *(continued)*

9 Have you made your racially nondiscriminatory policy known to all segments of the general community you serve by: a) publishing a notice of your policy in a newspaper of general circulation that serves all racial segments of the community; b) publicizing your policy over broadcast media in a way that is reasonably expected to be effective; or c) displaying a notice of your policy at all times on your primary, publicly accessible internet home page in a manner reasonably expected to be noticed by visitors to the homepage? If "Yes," continue to Line 10. ◯ Yes ◯ No

9a ☐ By checking this box, you agree that you will publicize your nondiscriminatory policy in a way that meets the requirements of Revenue Procedure 75-50, 1975-2 C.B. 587, as modified by Revenue Procedure 2019-22, I.R.B. 1260.

10 Do or will you (or any department or division of your organization) discriminate in any way on the basis of race with respect to admissions, use of facilities or exercise of student privileges, faculty or administrative staff, or scholarship or loan programs? If "Yes," for any of the above, explain fully. ◯ Yes ◯ No

11 Complete the table below to show the racial composition for the current academic year and projected for the next academic year. If you are not operational, submit an estimate based on the best information available (such as the racial composition of the community you serve).

For each racial category, enter the number of (a) students, (b) faculty, and (c) administrative staff. Provide actual numbers rather than percentages for each racial category.

Racial Category	(a) Student Body		(b) Faculty		(c) Administrative Staff	
	Current Year	Next Year	Current Year	Next Year	Current Year	Next Year
Total	0	0	0	0	0	0

12 In the table below, enter the number and amount of loans and scholarships awarded to enrolled students by racial categories. Provide actual numbers rather than percentages for each racial category.

☐ Check here if you will not provide any loans or scholarships to students.

Racial Category	Number of Loans		Amount of Loans		Number of Scholarships		Amount of Scholarships	
	Current Year	Next Year	Current Year	Next Year	Current Year	Next Year	Current Year	Next Year
Total	0	0	$0.	$0.	0	0	$0.	$0.

Schedule B. Schools, Colleges, and Universities *(continued)*

13 List your incorporators, founders, board members, and donors of land or buildings, whether individuals or organizations.

14 Do any of your incorporators, founders, board members, and donors of land or buildings, whether individuals or organizations, have an objective to maintain segregated public or private school education? If "Yes," explain. ◯ Yes ◯ No

15 Will you maintain records according to the nondiscrimination provisions contained in Revenue Procedure 75-50? If "No," explain. ◯ Yes ◯ No

Schedule C. Hospitals and Medical Research Organizations

1 Are you a medical research organization (an organization whose principal purpose or function is medical research and which is directly engaged in the continuous active conduct of medical research) operated in conjunction with a hospital? If "No," continue to Line 2. ◯ Yes ◯ No

1a Name the hospitals with which you have a relationship and describe the relationship.

1b List your assets showing their fair market value and the portion of your assets directly devoted to medical research.

Do not complete the remainder of Schedule C.

2 Are you applying for exemption as a cooperative hospital service organization described in section 501(e)? If "Yes," explain. ◯ Yes ◯ No

Do not complete the remainder of Schedule C.

3 Are all the doctors in the community eligible for staff privileges? If "No," give the reasons why and explain how the medical staff is selected. ◯ Yes ◯ No

Schedule C. Hospitals and Medical Research Organizations *(continued)*

4 Do or will you provide medical services to all individuals in your community who can pay for themselves or are able to pay through some form of insurance? If "No," explain. ◯ Yes ◯ No

5 Do you or will you maintain a full-time emergency room? If "Yes," continue to Line 6. ◯ Yes ◯ No

5a Are you a specialty hospital or would emergency services be duplicative based on your region or locality? ◯ Yes ◯ No

6 Do you provide free or below cost services? If "Yes," describe your policy for determining when and to whom you provide these services and how these services promote the organization's benefit to the community. ◯ Yes ◯ No

7 Do you or will you carry on a formal program of medical training or medical research? If "Yes," describe such programs, including the type of programs offered, the scope of such programs, and affiliations with other hospitals or medical care providers with which you carry on the medical training or research programs. ◯ Yes ◯ No

8 Do you or will you carry on a formal program of community education? If "Yes," describe such programs, including the type of programs offered, the scope of such programs, and affiliation with other hospitals or medical care providers with which you offer community education programs. ◯ Yes ◯ No

Schedule C. Hospitals and Medical Research Organizations *(continued)*

9 Is your board of directors composed of a majority of individuals who are representative of the community you serve, or do you operate under a parent organization whose board of directors is composed of a majority of individuals who are representative of the community you serve? If "Yes," continue to Line 10. ◯ Yes ◯ No

9a List each board member's name and business, financial, or professional relationship with the hospital. Also, identify each board member who is representative of the community and describe how that individual is a community representative. If you operate under a parent organization whose board of directors is not composed of a majority of individuals who are representative of the community you serve, provide the requested information for your parent's board of directors as well.

10 Do you operate a facility which is required by a state to be licensed, registered, or similarly recognized as a hospital? If "No," do not complete the rest of Schedule C. ◯ Yes ◯ No

10a Do you conduct a community health needs assessment (CHNA) at least once every three years and adopt an implementation strategy to meet the community health needs identified in the assessment as required by section 501(r)(3)? If "No," explain. ◯ Yes ◯ No

10b Do you have a written financial assistance policy (FAP) and a written policy relating to emergency medical care as required by section 501(r)(4)? If "No," explain. ◯ Yes ◯ No

Schedule C. Hospitals and Medical Research Organizations *(continued)*

10c Do you both (1) limit amounts charged for emergency or other medically necessary care provided to individuals eligible for assistance under your FAP to not more than amounts generally billed to individuals who have insurance covering such care, and (2) prohibit use of gross charges as required by section 501(r)(5)? If "No," explain. ◯ Yes ◯ No

10d Do you make reasonable efforts to determine whether an individual is FAP-eligible before engaging in extraordinary collection actions as required by section 501(r)(6)? If "No," explain. ◯ Yes ◯ No

Schedule D. Section 509(a)(3) Supporting Organizations

1 List the names, addresses, and EINs of the organizations you support.

2 Are all your supported organizations public charities under section 509(a)(1) or (2)? If "Yes," continue to Line 3. ◯ Yes ◯ No

2a Are your supported organizations tax exempt under section 501(c)(4), 501(c)(5), or 501(c)(6) and do your supported organizations meet the public support test under section 509(a)(2)? If "No," explain how each organization you support is a public charity under section 509(a)(1) or 509(a)(2). ◯ Yes ◯ No

3 Which of the following describes your relationship with your supported organization(s)?

◯ A majority of your governing board or officers are elected or appointed by your supported organization(s). (Type I supporting organization)

◯ Your control or management is vested in the same persons who control or manage your supported organization(s). (Type II supporting organization)

◯ One or more of your officers, directors, or trustees are elected or appointed by the officers, directors, trustees, or membership of your supported organization(s), or one or more of your officers, directors, trustees, or other important office holders, are also members of the governing body of your supported organization(s), or your officers, directors, or trustees maintain a close and continuous working relationship with the officers, directors, or trustees of your supported organization(s). (Type III supporting organization)

4 Describe how your governing board and officers are selected. If you are a Type III organization, also describe how your officers, directors, or trustees maintain a close and continuous working relationship with the officers, directors, or trustees of your supported organization(s).

Schedule D. Section 509(a)(3) Supporting Organizations *(continued)*

5 Do any persons who are disqualified persons (except individuals who are disqualified persons only because they are foundation managers) with respect to you or persons who have a family or business relationship with any disqualified persons appoint any of your foundation managers? If "Yes," (1) describe the process by which disqualified persons appoint any of your foundation managers, (2) provide the names of these disqualified persons and the foundation managers they appoint, and (3) explain how control is vested over your operations (including assets and activities) by persons other than disqualified persons. ◯ Yes ◯ No

6 Do any persons who are disqualified persons (except individuals who are disqualified persons only because they are foundation managers) have any influence regarding your operations, including your assets or activities? If "Yes," (1) provide the names of these disqualified persons, (2) explain how influence is exerted over your operations (including assets and activities), and (3) explain how control is vested over your operations (including assets and activities) by individuals other than disqualified persons. ◯ Yes ◯ No

7 Does your organizing document specify your supported organization(s) by name? ◯ Yes ◯ No
If "Yes" and you selected Type I above, continue to Line 8.
If "Yes," and you selected Type II, do not complete the rest of Schedule D.
If "No" and you selected Type III above, amend your organizing document to specify your supported organization(s) by name or you will not meet the organizational test and need to reconsider your requested public charity classification; then continue to Line 8.

7a Does your organizing document name a similar purpose or charitable class of beneficiaries as to your supported organization(s)? If "No," amend your organizing document to specify your supported organization(s) by name, purpose, or class or you will not meet the organizational test and need to reconsider your requested public charity classification. ◯ Yes ◯ No

If you selected Type II above, do not complete the rest of Schedule D.

8 Do you or will you receive contributions from any person who alone, or combined with family members or an entity at least 35% controlled by that person, controls any of your supported organizations, or will you receive contributions from any family member of, or an entity at least 35% controlled by, any person who controls any of your supported organizations? If "Yes," explain. ◯ Yes ◯ No

If you selected Type I above, do not complete the rest of Schedule D.

Schedule D. Section 509(a)(3) Supporting Organizations *(continued)*

9 Do the officers, directors, or trustees of your supported organization have a significant voice in your investment policies, the timing and making of grants, the selection of grant recipients, and in otherwise directing the use of your income or assets? If "Yes," explain. ◯ Yes ◯ No

10 In each taxable year, do you or will you provide each of your supported organizations with (a) a written notice addressed to a principal officer of the supported organization describing the type and amount of all of the support you provided to the supported organization during the immediately preceding taxable year, (b) a copy of your most recently filed Form 990-series return or notice, and (c) a copy of your governing documents? If 'No,' explain. ◯ Yes ◯ No

11 Do you exercise a substantial degree of direction over the policies, programs, and activities of your supported organization(s) and appoint or elect (directly or indirectly) a majority of the officers, directors, or trustees of your supported organization(s)? If "Yes," explain. ◯ Yes ◯ No

12 Do substantially all of your activities directly further the exempt purposes of one or more supported organizations to which you are responsive by performing the functions of, or carrying out the purposes of, such supported organization(s) and but for your involvement would normally be engaged in by such supported organization(s). If "Yes," explain and do not complete the rest of Schedule D. ◯ Yes ◯ No

Schedule D. Section 509(a)(3) Supporting Organizations *(continued)*

13 Do you distribute at least 85% of your annual net income or 3.5% of the aggregate fair market value of all of your non-exempt-use assets (whichever is greater) to your supported organization(s)? If "No," explain. ◯ Yes ◯ No

13a How much do you contribute annually to each supported organization?

13b What is the total annual revenue of each supported organization?

13c Do you or the supported organization(s) earmark your funds for support of a particular program or activity? If "Yes," explain. ◯ Yes ◯ No

Schedule E. Effective Date

1 Are you applying for reinstatement of exemption after being automatically revoked for failure to file required returns or notices for three consecutive years? If "No," continue to Line 2. ○ Yes ◉ No

1a Revenue Procedure 2014-11, 2014-1 C.B. 411, provides procedures for reinstating your tax-exempt status. Select the section of Revenue Procedure 2014-11 under which you want us to consider your reinstatement request.

○ Section 4. You are seeking retroactive reinstatement under section 4 of Revenue Procedure 2014-11. By selecting this line, you attest that you meet the specified requirements of section 4, that your failure to file was not intentional, and that you have put in place procedures to file required returns or notices in the future. Do not complete the rest of Schedule E.

○ Section 5. You are seeking retroactive reinstatement under section 5 of Revenue Procedure 2014-11. By selecting this line, you attest that you meet the specified requirements of section 5, that you have filed required annual returns, that your failure to file was not intentional, and that you have put in place procedures to file required returns or notices in the future.

Describe how you exercised ordinary business care and prudence in determining and attempting to comply with your filing requirements in at least one of the three years of revocation and the steps you have taken or will take to avoid or mitigate future failures to file timely returns or notices. Do not complete the rest of Schedule E.

○ Section 6. You are seeking retroactive reinstatement under section 6 of Revenue Procedure 2014-11. By selecting this line, you attest that you meet the specified requirements of section 6, that you have filed required annual returns, that your failure to file was not intentional, and that you have put in place procedures to file required returns or notices in the future.

Describe how you exercised ordinary business care and prudence in determining and attempting to comply with your filing requirements in each of the three years of revocation and the steps you have taken or will take to avoid or mitigate future failures to file timely returns or notices. Do not complete the rest of Schedule E.

○ Section 7. You are seeking reinstatement under section 7 of Revenue Procedure 2014-11, effective the date you are filling this application. Do not complete the rest of Schedule E.

2 Generally, if you did not file Form 1023 within 27 months of formation, the effective date of your exempt status will be the date you filed Form 1023 (submission date). Requests for an earlier effective date may be granted when there is evidence to establish you acted reasonably and in good faith and the grant of relief will not prejudice the interests of the government.

◉ Check this box if you accept the submission date as the effective date of your exempt status. Do not complete the rest of Schedule E.

○ Check this box if you are requesting an earlier effective date than the submission date.

2a Explain why you did not file Form 1023 within 27 months of formation, how you acted reasonably and in good faith, and how granting an earlier effective date will not prejudice the interests of the Government.

You may want to include the events that led to the failure to timely file Form 1023 and to the discovery of the failure, any reliance on the advice of a qualified tax professional and a description of the engagement and responsibilities of the professional as well as the extent to which you relied on the professional, a comparison of (1) what your aggregate tax liability would be if you had filed this application within the 27-month period with (2) what your aggregate liability would be if you were exempt as of your formation date, or any other information you believe will support your request for relief.

Schedule F. Low-Income Housing

1 Describe each facility including the type of facility, whether you own or lease the facility, how many residents it can accommodate, the current number of residents, and whether the residents purchase or rent housing from you.

2 Describe who qualifies for your housing in terms of income levels or other criteria and explain how you select residents.

3 Do you meet the safe harbor requirements outlined in Revenue Procedure 96-32, 1996-1 C.B. 717, which provides guidelines for providing low-income housing that will be treated as charitable, including for each project that (a) at least 75 percent of the units are occupied by residents that qualify as low-income and (b) either at least 20 percent of the units are occupied by residents that also meet the very low-income limit for the area or 40 percent of the units are occupied by residents that also do not exceed 120 percent of the area's very low-income limit, and less than 25 percent of the units are provided at market rates to persons who have incomes in excess of the low-income limit? ◯ Yes ◯ No

4 Is your housing affordable to low-income residents? If "Yes," describe how your housing is made affordable to low-income residents. ◯ Yes ◯ No

5 Do you impose any restrictions to make sure that your housing remains affordable to low-income residents? If "Yes," describe these restrictions. ◯ Yes ◯ No

Schedule F. Low-Income Housing *(continued)*

6 In addition to rent or mortgage payments, do residents pay periodic fees or maintenance charges? If "Yes," describe what these charges cover and how they are determined. ◯ Yes ◯ No

7 Do you provide social services to residents? If "Yes," describe these services. ◯ Yes ◯ No

8 Do you participate in any government housing programs? If "Yes," describe these programs. ◯ Yes ◯ No

Schedule G. Successors to Other Organizations

1 List the name, last address, and EIN of your predecessor organization and describe its activities.

2 List the owners, partners, principal stockholders, officers, and governing board members of your predecessor organization. Include their names, addresses, and share/interest in the predecessor organization (if for-profit).

3 Are you a successor to a for-profit organization? If "Yes," explain your relationship with the predecessor organization that resulted in your creation and explain why you took over the activities or assets of a for-profit organization or converted from for-profit to nonprofit status; continue to Line 4. ◯ Yes ◯ No

3a Explain your relationship with the other organization that resulted in your creation and why you took over the activities or assets of another organization.

Schedule G. Successors to Other Organizations *(continued)*

4 Do or will you maintain a working relationship with any of the persons listed in question 2 or with any for-profit organization in which these persons own more than a 35% interest? If "Yes," describe the relationship. ◯ Yes ◯ No

5 Were any assets transferred, whether by gift or sale, from the predecessor organization to you? If "Yes," provide a list of assets, indicate the value of each asset, explain how the value was determined, and attach an appraisal, if available. For each asset listed, also explain if the transfer was by gift, sale, or combination thereof and describe any restrictions that were placed on the use or sale of the assets. ◯ Yes ◯ No

6 Were any debts or liabilities transferred from the predecessor for-profit organization to you? If "Yes," provide a list of the debts or liabilities that were transferred to you, indicating the amount of each, how the amount was determined, and the name of the person to whom the debt or liability is owed. ◯ Yes ◯ No

7 Will you lease or rent any property or equipment to or from the predecessor organization or any persons listed in Line 2 or a for-profit organization in which these persons own more than a 35% interest? If "Yes," describe the arrangement(s) including how the lease or rental value was determined. ◯ Yes ◯ No

Schedule H. Organizations Providing Scholarships, Fellowships, Educational Loans, or Other Educational Grants to Individuals and Private Foundations Requesting Advance Approval of Individual Grant Procedures

Section I **Public charities and private foundations complete lines 1 through 8 of this section.**

1 Describe the types of educational grants you provide to individuals, such as scholarships, fellowships, loans, etc., including the purpose, number and amount(s) of grants, how the program is publicized, and if you award educational loans, the terms of the loans.

2 Do you maintain case histories showing recipients of your scholarships, fellowships, educational loans, or other educational grants, including names, addresses, purposes of awards, amount of each grant, manner of selection, and relationship (if any) to officers, trustees, or donors of funds to you? If "No," explain. ◯ Yes ◯ No

3 Describe the specific criteria you use to determine who is eligible for your program (for example, eligibility selection criteria could consist of graduating high school students from a particular high school who will attend college, writers of scholarly works about American history, etc.).

4 Describe the specific criteria you use to select recipients (for example, specific selection criteria could consist of prior academic performance, financial need, etc.).

Schedule H. Organizations Providing Scholarships, Fellowships, Educational Loans, or Other Educational Grants to Individuals and Private Foundations Requesting Advance Approval of Individual Grant Procedures *(continued)*

5 Describe any requirement or condition you impose on recipients to obtain, maintain, or qualify for renewal of a grant (for example, specific requirements or conditions could consist of attendance at a four-year college, maintaining a certain grade point average, teaching in public school after graduation from college, etc.).

6 Describe your procedures for supervising the scholarships, fellowships, educational loans, or other educational grants. Explain whether you obtain reports and grade transcripts from recipients, or you pay grants directly to a school under an arrangement whereby the school will apply the grant funds only for enrolled students who are in good standing. Also, describe your procedures for taking action if the terms of the award are violated.

7 How do you determine who is on the selection committee for the awards made under your program?

8 Are relatives of members of the selection committee, or of your officers, directors, or substantial contributors eligible for awards made under your program? If "Yes," what measures do you take to ensure unbiased selections? ◯ Yes ◯ No

Do not complete the rest of Schedule H. If you are a private foundation, you will be directed to complete Section II of Schedule H later in the application.

Schedule H. Organizations Providing Scholarships, Fellowships, Educational Loans, or Other Educational Grants to Individuals and Private Foundations Requesting Advance Approval of Individual Grant Procedures *(continued)*

Section II **Private foundations complete lines 1 through 7 of this section. Public charities do not complete this section.**

1 As a private foundation, do you want this application to be considered as a request for advance approval of grant making procedures? ◯ Yes ◯ No

If "No," do not complete the rest of Schedule H.

1a Check the box(es) indicating under which section(s) you want your grant making procedures to be considered.

☐ 4945(g)(1) - Scholarship or fellowship grant to an individual for study at an educational institution

☐ 4945(g)(3) - Other grants, including loans, to an individual for travel, study, or other similar purposes, to enhance a particular skill of the grantee or to produce a specific product

2 Do you represent that you will (1) arrange to receive and review grantee reports annually and upon completion of the purpose for which the grant was awarded, (2) investigate diversions of funds from their intended purposes, and (3) take all reasonable and appropriate steps to recover diverted funds, ensure other grant funds held by a grantee are used for their intended purposes, and withhold further payments to grantees until you obtain grantees' assurances that future diversions will not occur and that grantees will take extraordinary precautions to prevent future diversions from occurring? ◯ Yes ◯ No

3 Do you represent that you will maintain all records relating to individual grants, including information obtained to evaluate grantees, identify whether a grantee is a disqualified person, establish the amount and purpose of each grant, and establish that you undertook the supervision and investigation of grants described in Line 2? ◯ Yes ◯ No

4 Do you or will you award scholarships, fellowships, and educational loans to attend an educational institution based on the status of an individual being an employee of a particular employer? ◯ Yes ◯ No

If "No," do not complete the rest of Schedule H.

5 Will you comply with the seven conditions and either the percentage tests or facts and circumstances test for scholarships, fellowships, and educational loans to attend an educational institution as set forth in Revenue Procedures 76-47, 1976-2 C.B. 670, and 80-39, 1980-2 C.B. 772, which apply to inducement, selection committee, eligibility requirements, objective basis of selection, employment, course of study, and other objectives? ◯ Yes ◯ No

6 Do you or will you provide scholarships, fellowships, or educational loans to attend an educational institution to employees of a particular employer? If "No," continue to Line 7. ◯ Yes ◯ No

6a Will you award grants to 10% or fewer of the eligible applicants who were actually considered by the selection committee in selecting recipients of grants in that year as provided by Revenue Procedures 76-47 and 80-39? ◯ Yes ◯ No

7 Do you provide scholarships, fellowships, or educational loans to attend an educational institution to children of employees of a particular employer? ◯ Yes ◯ No

If "No," do not complete the rest of Schedule H.

7a Will you award grants to 25% or fewer of the eligible applicants who were actually considered by the selection committee in selecting recipients of grants in that year as provided by Revenue Procedures 76-47 and 80-39? ◯ Yes ◯ No

If "Yes," do not complete the rest of Schedule H.

Schedule H. Organizations Providing Scholarships, Fellowships, Educational Loans, or Other Educational Grants to Individuals and Private Foundations Requesting Advance Approval of Individual Grant Procedures *(continued)*

7b Will you award grants to 10% or fewer of the number of employees' children who can be shown to be eligible for grants (whether or not they submitted an application) in that year, as provided by Revenue Procedures 76-47 and 80-39? If "Yes," describe how you will determine who can be shown to be eligible for grants without submitting an application, such as by obtaining written statements or other information about the expectations of employees' children to attend an educational institution; do not complete the rest of Schedule H.

◯ Yes ◯ No

7c Will you award grants based on facts and circumstances that demonstrate that the grants will not be considered compensation for past, present, or future services or otherwise provide a significant benefit to the particular employer? If "Yes," describe the facts and circumstances you believe will demonstrate that the grants are neither compensatory nor a significant benefit to the particular employer. In your explanation, describe why you cannot satisfy either the 25% test or the 10% test in questions 7a and 7b.

◯ Yes ◯ No

TIPPECANOE EMERGENCY AMBULANCE SERVICES, INC.
FORM 1023 APPLICATION

EXHIBIT A – ARTICLES OF INCORPORATION

State of Indiana
Office of the Secretary of State

CERTIFICATE OF INCORPORATION

of

TIPPECANOE EMERGENCY AMBULANCE SERVICE, INC.

I, CONNIE LAWSON, Secretary of State of Indiana, hereby certify that Articles of Incorporation of the above Non-Profit Domestic Corporation have been presented to me at my office, accompanied by the fees prescribed by law and that the documentation presented conforms to law as prescribed by the provisions of the Indiana Nonprofit Corporation Act of 1991.

NOW, THEREFORE, with this document I certify that said transaction will become effective Friday, April 26, 2013.

In Witness Whereof, I have caused to be affixed my signature and the seal of the State of Indiana, at the City of Indianapolis, April 26, 2013.

Connie Lawson

CONNIE LAWSON,
SECRETARY OF STATE

2013042900796 / 2013042907580

APPROVED AND FILED
Connie Lawson
IND. SECRETARY OF STATE

IND. SECRETARY OF STATE
RECEIVED
2013 APR 26 PM 2:45

ARTICLES OF INCORPORATION OF TIPPECANOE EMERGENCY AMBULANCE SERVICE, INC.

The undersigned incorporator(s), desiring to form a corporation (hereinafter referred to as the "Corporation") pursuant to the provisions of the Indiana Nonprofit Corporation Act of 1991 (hereinafter referred to as the "Act"), execute the following Articles of Incorporation.

Article I

The name of the Corporation is Tippecanoe Emergency Ambulance Service, Inc., whose principal office address is 1501 Hartford Street, Lafayette, Indiana 47904.

Article II - Purposes

Section 1. The Corporation shall be incorporated under the laws of the State of Indiana as a not-for-profit organization operated exclusively for one of the purposes specified in Sec. 501(c)(3) of the Internal Revenue Code, or any corresponding section of any future federal tax code.

Section 2. The specific purpose of the corporation is to provide emergent transportation and pre-hospital care incident to that transportation and medical transport for primarily Tippecanoe County, Indiana, and to engage in other lawful purposes related thereto.

Section 3. The term for which the corporation is organized shall be perpetual.

Section 4. Notwithstanding any other provision of this certificate, the Corporation is organized exclusively for charitable purposes and shall not carry on any activities not permitted to be carried on by a corporation exempt from Federal income tax under Section 501(c)(3) of the Code. The Corporation is not formed for pecuniary profit or for financial gain and no part of its assets, income or profit shall inure to the benefit of, or be distributed to its members, trustees, directors, officers, or other private persons, except that the Corporation shall be authorized to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of one or more of its tax-exempt purposes. No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, except to the extent permitted by the Code pursuant to an election under Section 501(h) of the Code or otherwise, and the Corporation shall not participate in or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office. In any taxable year in which the Corporation is a private foundation as described in Section 509(a) of the code, the Corporation shall distribute its income for said period at such time and manner as not to subject it to tax under Section 4942 of the Code, and the Corporation shall not engage in any act of self-dealing as defined in Section 4941(d) of the Code, retain any excess business holdings as defined in Section 4943(c) of the Code, make any investments in such manner as to subject the Corporation to tax under Section 4944 of the Code, or make any taxable expenditures as defined in Section 4945(d) of the Code or corresponding provisions of any subsequent Federal tax laws.

Article III – Type of Corporation

The Corporation is a public benefit corporation, which is organized for a public or charitable purpose.

Article IV – Registered Agent and Registered Office

The registered agent for the Corporation and Registered Office for service of process is: Sr. Jane Marie Klein, OSF, whose principal office address is 1515 Dragoon Trail, Mishawaka, IN 46544.

Article V – Membership/Director Management

The Corporation will have two (2) Class A members: Franciscan Alliance, Inc., an Indiana Non-Profit corporation ("Franciscan"), and Indiana University Health Arnett, Inc. ("IU Health"); and one (1) Class B member: Tippecanoe County, Indiana (hereinafter "County"); and two (2) Class C members: the City of Lafayette, Indiana, an Indiana Municipal Corporation (hereinafter "Lafayette"), and the City of West Lafayette, Indiana, an Indiana Municipal Corporation (hereinafter "West Lafayette"). The Corporation shall be managed by its seven (7) Directors. The rights, duties, and obligations of the Class A and Class B and Class C members will be as outlined in the Bylaws of the Corporation.

Article VI – Incorporators

The name and address of the incorporator of the Corporation is:

Eric H. Burns
WITHERED BURNS, LLP
8 North 3rd St., Suite 401
P.O. Box 499
Lafayette, Indiana 47902-499

Article VII – Distribution of Assets on Dissolution or Final Liquidation

Upon the dissolution of the Corporation, the Board of Directors shall, after paying or making provisions for the payment of all of the liabilities of the Corporation, distribute all of the assets of the Corporation to one or more not-for-profit organizations as described in Section 501(c)(3) of the Internal Revenue Code, which are operated exclusively for charitable, scientific or educational purposes. Any of such assets not so distributed shall be distributed in accordance with the direction of any court having jurisdiction in the county in which the principal office of the Corporation is then located, exclusively for the aforesaid purposes of the Corporation or to such qualified organization or organizations as said court shall determine.

Article VIII – Other Provisions

Section 1. It is intended that this Corporation shall have and continue to have the status of a corporation which is exempt from Federal income taxation under Section 501 of the Code as an organization described in Section 501(c)(3) of the Code, and these Articles shall be construed

accordingly, and all powers and activities hereunder shall be limited accordingly. The Corporation shall not carry on any activity, which would result in the loss of exemption under Section 501(c)(3) of the Code.

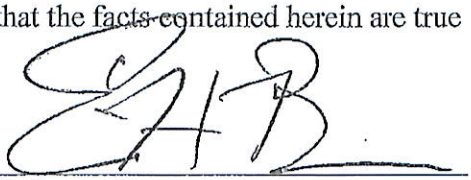
Section 2. The territory in which the Corporation's operations are to be conducted is the United States.

Section 3. Any reference in these Articles to a section of the Code shall be interpreted to include a reference to the corresponding provisions of any applicable future United States Internal Revenue Code.

Section 4. These Articles may be amended only by unanimous vote of the Class A members of the Corporation.

Section 5. The initial Board of Directors shall consist of the following seven (7) persons: Two (2) designees from each of the two (2) Class A members, one (1) designee from the one (1) Class B member and one (1) designee from each of the two (2) Class C members.

IN WITNESS WHEREOF, the undersigned incorporator of said Corporation executes this document and verifies subject to penalties of perjury that the facts contained herein are true this 24th day of April, 2013.



Eric H. Burns, Incorporator
WITHERED BURNS, LLP
8 North 3rd St., Suite 401
P.O. Box 499
Lafayette, Indiana 47902-0499

This instrument prepared by: Eric H. Burns (4032-79), Withered Burns, LLP, 8 North Third Street, Suite 401, P.O. Box 499, Lafayette, IN 47902-0499, Telephone: 765-742-1988.

TIPPECANOE EMERGENCY AMBULANCE SERVICES, INC.
FORM 1023 APPLICATION

EXHIBIT B - BYLAWS

Amended December 17, 2013 and April 22, 2014, Section 2. Administrative Titles.
February 18, 2015, Exhibits A, B, C. June 9, 2015, Exhibits A, B, C

BYLAWS

OF

TIPPECANOE EMERGENCY AMBULANCE SERVICE, INC.

Amended December 17, 2013
Section 2. Administrative Titles

Amended April 22, 2014
Section 2. Administrative Titles

Amended February 18, 2015
Exhibits A, B, C.

Amended June 9, 2015
Exhibits A, B, C

ARTICLE I

General

Section 1. Name. The name of the corporation is "Tippecanoe Emergency Ambulance Service, Inc." (the "Corporation").

Section 2. Fiscal Year. The fiscal year of the Corporation shall begin on the first day of January and end on the last day of December next succeeding.

Section 3. Mission, Philosophy, Goals and Objectives. The Corporation shall be driven by values and beliefs that are consistent with those of its Class A Members, Franciscan Alliance, Inc., an Indiana nonprofit corporation ("Franciscan Alliance"), and Indiana University Health Arnett, Inc. ("IU Health"). The goals and objectives of the Corporation are as follows:

(a) To operate or provide a business to be known as "Tippecanoe Emergency Ambulance Service" ("TEAS") that provides governance for emergent transportation, pre-hospital care incident to emergent transportation, and medical transport services

primarily serving Tippecanoe County and that engages in other lawful purposes related thereto ("Ambulance Services");

(b) To provide leadership and facilitate coordination in the provision of Ambulance Services and other services related thereto, including professional education, research, centralized strategic planning, capital finance, marketing, entering into mutual aid agreements, securing accreditation of the Ambulance Services, and such other administrative and management activities as shall be identified in order to enhance quality, reduce unnecessary duplication of resources, and increase efficiencies in the provision of Ambulance Services in Tippecanoe County;

(c) To accomplish the goals and objectives set forth herein as efficiently and effectively as possible; and

(d) To achieve such other goals and objectives as the members and Board of Directors of the Corporation shall establish.

Section 4. Operations. The Corporation shall adopt policies and procedures that will not conflict with the missions and goals of the Class A members, including without limitation the official teachings and canon law of the Roman Catholic Church and the Ethical and Religious Directives for Catholic Health Care Services as approved by the National Conference of Catholic Bishops, as the same may be amended or revised from time to time and interpreted by the Bishop of the Diocese of Lafayette-in-Indiana, or any successor diocese. Notwithstanding the foregoing, except as expressly set forth elsewhere herein, the Class A Members shall maintain and operate their respective independent operations in accordance with their respective independent identities.

Section 5. Agreement. The purpose of these Bylaws and the Corporation's Articles of Incorporation is to effectuate the provisions, terms and conditions of that certain Memorandum of Understanding Between the Class A, Class B, and Class C Members dated as of April 1st, 2013 (the "MOU") and shall be construed, at all times and under all circumstances, to be in furtherance of the goals and objectives of the MOU.

ARTICLE II

Membership

Section 1. Members. The Corporation shall have three (3) classes of members, the Class A membership class, Class B membership class, and the Class C membership class.

(a) Class A Members. The Class A membership class shall consist of and be limited to Franciscan Alliance and IU Health (the "Class A Members"). The Class A Members shall have the sole and exclusive right and power to elect their respective directors as provided herein. The Class A Members shall have unlimited voting rights, and each Class A Member shall be entitled to two (2) votes on all matters on which the Class A Members are entitled to vote upon under the Articles, the Bylaws or applicable law. Class A Members shall be entitled to equal allocations of the Corporation's profit and losses and to distributions as provided herein.

(b) Class B Member. The Class B membership class shall consist of and be limited to Tippecanoe County, Indiana (the "Class B Member"). The Class B Member shall have the sole and exclusive right and power to elect its director as provided herein. The Class B Member shall have limited voting rights as specified herein, and the Class B Member shall be entitled to one (1) vote on all matters on which the Class B Member is entitled to vote upon under the Articles, the Bylaws or applicable law. The Class B

Member shall not be entitled to any allocation of the Corporation's profit and losses or to any distributions.

(c) Class C Members: The Class C membership class shall consist of and be limited to the City of Lafayette, Indiana and the City of West Lafayette, Indiana (the "Class C Members"). The Class C Members shall have the sole and exclusive right and power to elect their respective directors as provided herein. The Class C Members shall have limited voting rights as specified herein, and each Class C Member shall be entitled to one (1) vote on all matters on which the Class C Members are entitled to vote upon under the Articles, the Bylaws, or applicable law. Class C Members shall not be entitled to any allocation of the Corporation's profit and losses or to any distributions.

Section 2. Voting. For all matters requiring the affirmative vote of the members of the Corporation, the Class A Members, Class B Member, and the Class C Members shall vote as independent classes of members and, except as provided in Article III, Section 2 hereof, any such matter shall require the approval of a majority of the Class A, Class B, and Class C Members. The individuals, who serve as the respective Chairpersons of the Boards of Directors of Franciscan Alliance and IU Health, or their respective designees, shall cast the votes of each respective Class A Member. The individual who serves as President of the Tippecanoe County Commissioners, or its respective designee shall cast the vote of the Class B member; the Mayor of the City of Lafayette, Indiana, and the Mayor of the City of West Lafayette, Indiana, or their respective designees, shall cast the votes of each respective Class C Members.

Section 3. Annual Meeting of Members. An annual meeting of the members of the Corporation shall be held within six (6) months after the end of the Corporation's fiscal year for the purposes of electing the directors of the Corporation and of transacting such other business as

may come before the meeting. If the election of directors shall not be held on the day so designated, it shall be held at a special meeting of the members called as soon thereafter as may be convenient.

Section 4. Special Meetings of Members. Special meetings of the members may be called at any time by a Class A Member.

Section 5. Place of Meetings. All meetings of the members of the Corporation shall be held at the Corporation's principal office in Indiana, or at such other place as shall be designated in the call of the meeting.

Section 6. Notice of Meetings. Regular meetings of the members shall be scheduled for one calendar year which schedule shall be presented at the January meeting of the Board for approval. This shall serve as notification of regularly scheduled meetings. The first meeting and schedule shall occur during the month that the Corporation is incorporated. Written or printed notice of every meeting of the members, stating the place, date and hour of the meeting, shall be delivered to each member, personally, by mail, or by electronic mail by the Secretary of the Corporation at the direction of the person or persons calling the meeting, not less than ten (10) nor more than forty (40) days before the date of the meeting. When the meeting is special or when required by the Indiana Nonprofit Corporation Act of 1991 (IC 23-17-1), as amended (the "Act"), or any other law or these Bylaws, the purpose for which the meeting is called shall be stated in the notice. If mailed, the notice of a meeting shall be deemed delivered when deposited in the United States mail addressed to each member at its address shown on the records of the Corporation, with postage prepaid. Electronic mail notifications shall only be for those regularly scheduled meetings approved in advance by the members or as an additional means of notification for special meetings.

Section 7. Organization. At all meetings of the members, the Chairperson of the Board of Directors, or in the Chairperson's absence, the Vice Chairperson, or in the absence of both such persons, a person chosen by the members of the Corporation, shall preside. The Secretary, or in the Secretary's absence, the Assistant Secretary, or in the absence of both such persons, a person appointed by the presiding officer of the meeting, shall act as Secretary of the meeting and shall keep a record of the proceedings and of attendance at the meeting.

Section 8. Informal Action by Members. Any action required by the provisions of the Act or any other law or by the Corporation's Articles of Incorporation or these Bylaws to be taken at a meeting of the members of the Corporation, or which may be taken at such a meeting, may be taken without a meeting if, prior to such action, a consent in writing setting forth the action to be taken shall be signed by the members with respect to the subject matter thereof and such written consent is filed with the minutes of the proceedings of the Corporation.

Section 9. Transferability of Membership. Membership in either class of the Corporation shall not be transferable or assignable, provided that a Class A Member may transfer or assign its Class A membership interest to the other Class A Member and, provided further, that either Class A Member may at any time and from time to time, without the consent of the other or the Class B & C Members, transfer or assign membership interest to (a) an affiliate, subsidiary or parent of the Class A Member, (b) an entity with which the Class A Member is merged or consolidated, or (c) an entity which purchases all or a substantial portion of a Class A Member's assets or stock provided that any such successor entity is qualified as an organization under Section 501(c)(3) of the Code. To the extent necessary to affect the transfer or assignment permitted under the provisions of this Section 9, the members and the Board of Directors shall

adopt such actions and execute such documents, including one or more amendments to these Bylaws, as shall be necessary to affect such permitted transfer or assignment.

Section 10. Contributions. The Class A Members shall contribute capital to the Corporation.

The Class B Member shall be entitled to make contributions to the Corporation from time to time, subject to the acceptance of such contributions by the Board of Directors and the other members of the Corporation, but any such contributions shall not be capital contributions and shall not entitle a Class B Member to any equity position in the Corporation, to any portion of the Corporations profit or losses, or to any distributions from the Corporation. The Class B member shall make the contributions set forth in paragraphs 7 and 9 of the MOU.

Section 11. Distributions. Franciscan Alliance will initially absorb all retained earnings or losses of TEAS, Inc. A fifty percent (50%) Profit/Loss interest will be shared with IU Health on a quarterly basis thereafter, and upon joint operations of the organization.

Section 12. Dissolution. Upon the dissolution of the Corporation or the winding up of its affairs, and after the satisfaction of all of the obligations and liabilities of the Corporation as required by law, the assets of the Corporation shall be distributed to its Class A Members. Furthermore, the assets held by Franciscan that have been financed through capital contributions of the Class A Member ("Class A Assets") shall also be distributed to its Class A Members. Each Class A Member shall be entitled to fifty percent (50%) of (i) the fair market value of the Class A Assets purchased or otherwise acquired that are still in use since the start of the Corporation; and (ii) the cash and accounts receivable of the business operations under the governance of the Corporation. If, at such time, any Class A Member is not existing and

qualified as an organization under 501(c)(3) of the Code, then the assets that would have been distributable to such entity if it were existing and so qualified shall be distributed as follows:

(a) In the case of Franciscan Alliance, to Sisters of Saint Francis of Perpetual Adoration, Inc. (Eastern Province), an Indiana nonprofit corporation (the "Eastern Province"), if then existing and so qualified. If, at such time, the Eastern Province is not existing and so qualified, then the assets that would have been distributable to it if it were existing and so qualified shall be distributed to the Roman Catholic Diocese of Lafayette-in-Indiana, or any successor diocese, to be used as directed by the Bishop of such diocese for the health and education purposes of the diocese.

(b) In the case of IU Health, to such qualified successor as may be designated by IU Health pursuant to the Corporation's Articles of Incorporation and as permitted by the Act and the Code.

Section 13. Member Activities. With the exception of transfers to a higher level of patient care, during the term of this Agreement, no member, either directly or indirectly, shall engage in the provision of any form of Ambulance Services in Tippecanoe County, Indiana or any of the immediately adjacent counties that is materially competitive to emergency response ground transportation services, programs or operations of the Corporation.

Section 14. Right to Withdraw. Any member shall have the right to withdraw from the Corporation for any reason upon 120 days' prior written notice to the other members. Any remaining members shall have thirty (30) days after receiving written notice to send notice of its or their intent to withdraw.

ARTICLE III

Board of Directors

Section 1. General Powers of the Board of Directors. Subject to any specific limitations or restrictions imposed by the Act or any other law, by the Corporation's Articles of Incorporation or these Bylaws, including the provisions of Section 2 below, as either may be amended from time to time, and by the requirements of the Code, the business and affairs of the Corporation shall be managed, controlled, operated and conducted by, and under the supervision of, the Board of Directors, and the Board of Directors shall have exclusive responsibility for the determination of policy for the Corporation. The Board of Directors has the ultimate authority to set the general outlines of procedures essential to implement policy, but the administration of the ordinary activities of the Corporation shall be conducted by the Corporation's officers and other persons appointed by such officers for that purpose.

Section 2. Limitation of Powers. Notwithstanding the provisions of Section 1 above, action by the Board of Directors on certain matters shall require, in addition to all other actions and approvals required by the Act, the Corporation's Articles of Incorporation and these Bylaws, the approval of the members of the Corporation as specified below:

(a) Approval of the Class A Members. The following matters require the approval of all voting Class A Members of the Corporation:

(1) Approving, amending, and repealing the Corporation's Articles of Incorporation or these Bylaws, including, without limitation, Section 4 of Article I and Section 5 of Article VII of these Bylaws;

(2) Approving any major changes in the operations of the Corporation that will impact the scope of services provided by the Corporation or any of its controlled entities that differ from the operations and services of the Corporation described in the Corporation's Articles of Incorporation or Article I of these Bylaws;

(3) Approving any debt incurred or borrowing of funds by the Corporation in excess of the limits established by the members, from time to time, or as required by canon law, or authorizing, approving, or entering into any agreement for the

Corporation to serve as a guarantor, surety or co-obligor with respect to the indebtedness of any other party;

(4) Authorizing the Corporation to enter into affiliations, joint ventures and alliance arrangements with any third parties, whether in the form of contractual joint ventures, new entity joint ventures, or other joint venture forms;

(5) Approving any sale, transfer or other disposition of any asset of the Corporation constituting an alienation of Roman Catholic Church stable patrimony under canon law for which the approval of the Holy See is required;

(6) Approving the acquisition, sale, lease, transfer, or other alienation of property of the Corporation, where such action is not in the usual and regular course of the Corporation's business and where such action deals with property with an aggregate value of $10,000 or more;

(7) Authorizing the acquisition by the Corporation of an ownership interest in, or substantially all the assets of, any other business or entity;

(8) Approving any additional capital contribution by any member;

(9) Approving the annual budget, capital plan, long-range strategic plan of the Corporation or any major changes in the operations of the Corporation that will impact the scope of services provided by the Corporation;

(10) Approving the merger, dissolution, consolidation or reorganization of the Corporation or the sale or transfer of substantially all of the assets of the Corporation;

(11) Taking any action which would be inconsistent with the governing documents of the Corporation.

(12) Admitting any additional members to the Corporation, except as otherwise provided for in these Bylaws; and

(13) Settling litigation involving the Corporation.

(14) Selecting, hiring, and or terminating the Corporation's Medical Director and EMS Director.

(b) Approval of the Members. The following matters require a simple majority of affirmative votes (of the seven (7) total votes) from the Members of the Corporation without regard to class of membership:

(1) Electing and removing the Chairperson and Vice Chairperson of the Board of Directors of the Corporation; and

(2) Approving, interpreting and changing the mission, philosophy, goals, objectives, role or purposes, or any statement thereof, of the Corporation.

(3) Routine approval of Board meeting minutes, activities, financial and operational reports.

Section 3. Prohibited Actions. Notwithstanding anything to the contrary in this Article III, under no circumstances shall the Board of Directors of the Corporation authorize any of the following actions:

(a) No director, officer, member, agent or employee of the Corporation, or any private individual, corporation or group, may receive any pecuniary profit or benefit, or any part of the capital or earnings of the Corporation, from the Corporation, except such compensation as may be allowed for services actually rendered or such distribution, as may be permitted or required pursuant to the Corporation's Articles of Incorporation, Sections 11 or 12 of Article II above or Sections 1 or 5 of Article VII below;

(b) Except as specifically permitted or authorized by both of the members, no advancement on account of services to be performed in the future, nor any loan of money or property to any director or officer of the Corporation shall be made;

(c) No substantial part of the activities of the Corporation shall be devoted to the influence of legislation, as provided in Section 501(c)(3) of the Code; and

(d) The Corporation shall not participate or intervene (including the publication or distribution of statements) in any political campaign on behalf of or in opposition to any candidate for public office.

Section 4. Number and Term. The Corporation shall have, at all times, a number of directors consisting of a minimum of four (4) and a maximum of seven (7), provided, however, that the exact number of directors shall be prescribed in these Bylaws, as may be amended from time to time. The terms of all directors shall be of two (2) year duration and until their successors are duly elected and qualified. Any director may serve any number of consecutive or nonconsecutive terms. In order to create staggered terms for the Class A Member directors of the Corporation, after the first two (2) year term of the initial Class A Member directors, those directors shall be divided into two (2) groups, with equal representation of each of the Class A Member directors provided for in Section 5 below, to serve terms of one (1), and two (2) years per group (i.e., one (1) of each of the Class A Member directors shall serve for a one (1) year term; and one (1) of each of the Class A Member directors shall serve for two (2) year term).

Section 5. Initial Directors upon Effective Date. The Corporation shall have an initial number of seven (7) directors upon the effective date of these Bylaws set forth in Section 5 of Article IX below. These initial seven (7) directors shall be: (i) two (2) individuals appointed by each Class A Member (the "Class A Directors"); (ii) one individual nominated by the Class B Member (the "Class B Director"); (iii) two (2) individuals one of each appointed by each Class C Member (the "Class C Directors"); provided, however, that the Class B and C Directors shall be approved and elected by the Members, and provided further that the Class A Members shall have the absolute right to remove any Class B and/or C Director or eliminate and/or reinstate the Class B or C Director seat or seats on the board in their sole discretion and without further amending these Bylaws. Upon the effective date of these Bylaws set forth in Section 5 of Article IX below, the initial directors (including the Chairperson and the Vice Chairperson of the Board of

Directors, see also Sections 8 and 9 below) of the Corporation shall be the individuals set forth on Exhibit A attached hereto and shall serve for initial terms of two (2) years.

Section 6. Election of Directors. With the exception of the initial directors upon the effective date of these Bylaws provided for in Section 5 above, each Class A Member shall elect two (2) of the Class A Directors by a vote of such Class A Member. The Class B Director and Class C Directors shall be elected by the Members as provided herein. Successors shall be elected and vacancies in the Board of Directors arising by virtue of the expiration of a term, resignation, death or otherwise, shall be filled by a vote solely of the Class A Member that appointed such Class A Director, or, in the case of the Class B Director and Class C Directors, the Members in accordance with the above provision.

Section 7. Duties of Directors. It is the duty of all directors to participate actively in the affairs of the Corporation, to attend at least two-thirds (2/3) of the meetings of the Board of Directors and at least one-half (1/2) of the meetings of committees of the Board of Directors on which they are serving, to take part in the programs sponsored by the Corporation for the orientation and continuing education of members of the Board of Directors and to be actively involved in any accreditation of facilities of the Corporation that may be undergoing accreditation review. Failure to comply with these requirements shall constitute cause for removal.

Section 8. Chairperson of the Board of Directors. The Chairperson of the Board of Directors, who must be a Class A Director of the Corporation, shall be selected by the members of the Corporation and shall preside at all meetings of the Board of Directors, shall provide liaison between the Board of Directors and the officers, shall have such other duties as may be prescribed by the Board of Directors and shall retain the right to vote on all matters presented to

the Board of Directors. In addition to the provisions of Sections 4 and 5 above, the initial Chairperson of the Board of Directors, or his or her successor as selected in the same manner as the Chairperson, shall serve for the initial three (3) years of the Corporation's existence.

Section 9. Vice Chairperson of the Board. The Vice Chairperson of the Board, who must be a Class A Director of the Corporation, shall be selected by the members and shall perform all the duties of the Chairperson of the Board of Directors in the absence or disability of the Chairperson. The Vice Chairperson shall have such other duties as may be prescribed by the Board of Directors. In addition to the provisions of Sections 4 and 5 above, the initial Vice Chairperson of the Board of Directors, or his or her successor as selected in the same manner as the Vice Chairperson by the same Class A Member that selected the initial Vice Chairperson, shall serve for the initial three (3) years of the Corporation's existence.

Section 10. Treasurer. The Treasurer of the Board, who must be a Class A Director of the Corporation, shall be selected by the members of the Corporation, and shall have charge and provide for the custody of all funds and securities of the Corporation. In general, the Treasurer shall perform all the duties ordinarily incident to the office of treasurer of a corporation and such other duties as may be prescribed by the Board of Directors or by the Chairperson in the absence of action by the Board of Directors. If required by the Board of Directors, the Treasurer shall give a bond for the faithful discharge of his or her duties, in such sum and with such surety or sureties as the Board of Directors may determine.

Section 11. Secretary. The Secretary of the Board, who must be a Class A Director of the Corporation, shall be selected by the members of the Corporation, and shall ensure the keeping of minutes of all meetings of the members and the Board of Directors and any committees of the Board of Directors, see that all notices are duly given in accordance with the

provisions of the Act or any other law or these Bylaws, be custodian of the corporate books and records and keep a register of the post office addresses of the all of the members and directors of the Corporation. In general, the Secretary shall perform all duties ordinarily incident to the office of secretary of a corporation and such other duties as may be prescribed by the Board of Directors or by the Chairperson in the absence of action by the Board of Directors.

Section 12. Annual and Regular Meetings. An annual meeting of the Board of Directors shall be held at such time as may be designated by the Board of Directors, and the Board of Directors may fix the dates for additional regular meetings to be held prior to the next annual meeting. There shall be regular meetings of the Board of Directors to be held at such time designated by the Board of Directors, but no less often than quarterly. The annual meeting and all regular meetings shall be held at the Corporation's principal office in Indiana, or at such other place as shall be designated in the call of the meeting.

Section 13. Special Meetings. Special meetings of the Board of Directors may be called at any time by or at the request of the Chairperson, or a majority of the directors or by either Class A Member. All special meetings shall be held at the Corporation's registered office in Indiana, or at such other place as shall be designated in the call of the meeting. The notice of the meeting shall be deemed delivered when deposited in the United States mail addressed to each member at its address shown on the records of the Corporation, with postage prepaid. Electronic mail notifications shall only be for those regularly scheduled meetings approved in advance by the members or as an additional means of notification for special meetings.

Section 14. Notice. Notice of all meetings of the Board of Directors, including special meetings, shall be given at least ten (10) days prior to the meeting by written notice, delivered personally, by mail, or electronic mail, telegram or facsimile to the directors at their addresses as

shown on the records of the Corporation. If mailed, the notice shall be deemed to be delivered when deposited in the United States mail in a sealed envelope so addressed, with postage prepaid. If by electronic mail, it shall be deemed to be delivered upon electronic confirmation of delivery. If notice is given by facsimile, it shall be deemed to be delivered when transmission is confirmed. Any director may waive notice of a meeting. The attendance of a director at a meeting shall constitute a waiver of notice of the meeting, except where he or she attends a meeting for the express purpose of objecting to the transaction of any business because the meeting has not been lawfully called or convened. The business to be transacted at any meeting of the Board of Directors and the purpose of the meeting shall be specified in the notice or waiver of notice of the meeting, provided, however, that the omission or possible insufficiency of the description of such business or purpose shall not be grounds to contest or set aside any action of the Board of Directors, unless specifically required by the Act or any other law or these Bylaws.

Section 15. Quorum Except as otherwise provided by the Act or any other law by the Corporation's Articles of Incorporation or elsewhere in these Bylaws, the in person or electronic live connection, presence at a meeting of a majority of the directors elected or appointed by each Class A Member shall be necessary to constitute a quorum for the transaction of business of the Board of Directors. If a quorum is not present at a meeting, a majority of the Class A Directors present may adjourn the meeting from time to time without further notice.

A Director may appear at a meeting only by another Director appointed by duly executed written proxy with the same force and effect as if the Director was present at the meeting in person. The form of the proxy shall be as attached hereto as Exhibit E.

Section 16. Manner of Acting. Except as otherwise provided by these Bylaws, the act of a majority of the directors present in person or via electronic live connection at a meeting at which a quorum is present shall be the act of the Board of Directors,.

Section 17. Removal. Any director may be removed by the members of the Corporation at any time, with or without cause, in accordance with the provisions of the Act, whenever in the judgment of the members the best interests of the Corporation would be served thereby, provided, however, that no such removal shall be effective until notice thereof is given to the director so removed in the same manner as notice is given regarding meetings of the Board of Directors and, provided further, that a Class A Member, each in its respective individual capacity and sole discretion, may remove and replace any and all Class A Directors elected by such Class A Member at any time for any reason whatsoever, and the Class B Member may remove and nominate a replacement Class B Director nominated by such Class B Member at any time for any reason whatsoever, and each Class C Member may remove and nominate a replacement Class C Director nominated by such Class C Member at any time for any reason whatsoever, subject always to the Members' reserved rights with respect to the Class B Director as specified elsewhere herein and subject also to the notice provision set forth above. Any member removing a director elected by such member shall provide the other members prompt written notice of such removal and any replacement (or nominee in the case of the Class B or C Members).

Section 18. Vacancies. Any vacancy occurring on the Board of Directors and any directorship to be filled by reason of an increase in the number of directors shall be filled by the members of the Corporation or the Class B and Class C Members in accordance with Section 6

above. A director elected to fill a vacancy shall serve for the unexpired term of his or her predecessor in office.

Section 19. Compensation. Directors shall not receive any compensation for their services as such, but shall be entitled to reimbursement for reasonable expenses incurred in attending meetings or performing other duties as directors of the Corporation. This provision shall not preclude any director from serving the Corporation as an officer or employee and receiving compensation therefor.

Section 20. Informal Action by Directors. Any action required to be taken at a meeting of directors may be taken without a meeting if prior to such action a consent in writing setting forth the action shall be signed by all of the directors of the Corporation and such written consent is filed with the minutes of proceedings of the Board of Directors.

Section 21. Participation by Telephone. Directors may participate in and act at any meeting of the Board of Directors through the use of a conference telephone or other communications equipment by means of which all persons participating in the meeting can simultaneously communicate with one another. Such participation shall constitute attendance and presence in person at the meeting.

ARTICLE IV

Officers

Section 1. Officers. The officers of the Corporation shall be The Chairperson, Vice-Chairperson, Secretary, and Treasurer of the Board of Directors. Officers of The Board may only be Class A Members. The Board of Directors may also provide for the appointment of other officers, including one or more Assistant Secretaries and one or more Assistant Treasurers, and

such other officers shall have the authority and perform the duties prescribed by these Bylaws or by the Board of Directors. Any two or more offices may be held by the same person for a period not to exceed ninety (90) days, except the offices of Chairperson and Vice-Chairperson.

Section 2. Administrative Titles. Administrative titles may be used in addition to the corporate titles specified by Section 1 above, but all administrative titles and appointments, including without limitation the hiring and appointment of a Medical Director and EMS Director shall be approved, authorized or ratified by the Board of Directors (and the Members, if such Member approval, authorization, or ratification is required elsewhere herein) of the Corporation. All other hiring and appointment decisions regarding TEAS employees or volunteers shall rest with the EMS Director of TEAS. If disputes and conflicts occur between TEAS employee(s) and TEAS Director, resolution shall rest with the Class A entity that employs the individual(s).

Section 3. Election and Term of Office. Subject to the provisions of Section 2 of Article III above, all of the officers of the Corporation shall be elected by the Board of Directors at the annual meeting of directors. If the election of officers shall not be held at such meeting, it shall be held as soon thereafter as may be convenient.

Section 4. Removal. Subject to the provisions of Section 2 of Article III above when applicable, the officers and individuals holding the administrative titles of Medical Director and EMS Director of the Corporation may be removed only by the Board of Directors at any time, with or without cause, whenever in the judgment of the Board of Directors, the best interests of the Corporation would be served thereby. Such removal shall be without prejudice to the contract rights, if any, of the person or persons so removed, but election to office shall not of itself create any contract rights.

Section 5. Vacancies. Subject to the provisions of Section 2 of Article III above when applicable, vacancies in all offices or in the positions of Medical Director and EMS Director of the Corporation shall be filled by the Board of Directors. Persons elected to fill vacancies shall serve for the unexpired term of their predecessors in office.

Section 6. Employment Contracts. Every employment for personal services to be rendered to the Corporation shall be at the pleasure of the Corporation unless the employment is for a specified term and pursuant to a written contract approved, authorized or amended in advance by the Board of Directors of the Corporation.

Section 7. Control by Board. The powers and duties of officers of the Corporation as prescribed by this Article IV or elsewhere in these Bylaws are subject to alteration or suspension by the Board of Directors, in specific instances or for specific purposes, as set forth in the resolution effecting such alteration or suspension. In addition, any and all actions taken by officers and individuals holding the administrative titles of Medical Director and EMS Director of the Corporation with respect to the following matters must be approved or authorized in advance by the Board of Directors of the Corporation:

(a) Entering into any agreement or arrangement with any director, officer, member or employee of the Corporation; any physician who holds or will hold staff privileges at any hospital operated by a member, or any business enterprise affiliated with any such physician; any family member or spouse of any such party; or any non tax-exempt enterprise that is owned, operated or controlled, directly or indirectly, by any such party;

(b) Forming or acquiring an ownership interest in any new enterprise; and

(c) Entering into any unbudgeted agreement or arrangement that commits the Corporation to expend more than $10,000 or, in the case of any type of lease or rental arrangement, has a term (including by virtue of any options or renewal periods) of greater than five (5) years. Additionally, on a monthly basis, the Board shall be informed of any unbudgeted agreement or arrangement that commits the Corporation to expend more than $10,000. For purposes of this Section 8, (i) "family member" shall mean husband or wife; natural or adoptive parent, child or sibling; stepparent, stepchild, stepbrother or stepsister; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law or sister-in-law; grandparent or grandchild; and spouse of a grandparent or grandchild, and (ii) "enterprise" shall mean any entity, including without limitation, any corporation, partnership, firm, joint venture, association, limited liability company, joint-stock company, trust or unincorporated organization. Notwithstanding the foregoing, any director, officer, member or employee of the Corporation involved, either directly or indirectly, in the provision of certain services to the Corporation without competitive bid pursuant to Section 5 of Article VII below shall be exempted from the provisions of this Section 7 with respect to the provision of such services only.

ARTICLE V

Executive Committee

Section 1. Appointment and Powers. The Board of Directors may from time to time designate three (3) or more of its members to serve as the Executive Committee, which Committee shall have such duties and powers as the Board of Directors may delegate to it in the resolution designating such Committee; provided, however, that any such Executive Committee

shall consist of at least two (2) Class A Directors, that the respective Class A Members shall be equally represented on such Executive Committee, that the chairperson of such Executive Committee shall be a Class A Director of the Corporation, and that there shall be one (1) Class B Director on such Executive Committee. Class C Directors are not eligible to serve on the Executive Committee. Such Executive Committee shall keep regular minutes of its meetings and shall cause them to be reported to the Board of Directors at or prior to the next meeting of said Board. The Class A Members of the Board of Directors shall have the authority to appoint, modify, and terminate the appointment of an Executive Committee.

ARTICLE VI

Other Committees

Section 1. Medical Advisory Committee. The Corporation shall establish a committee to be known as the Medical Advisory Committee. Its purpose shall be to provide advice as to the Corporation's patient care guidelines and to make recommendations to the Medical Director concerning them. The Medical Advisory Committee shall consist of six (6) members of such persons as the Board of Directors may in its discretion appoint, provided, however, that the Committee shall have the following standing members: (i) one Class A Director representing each Class A Member; (ii) the Chief Medical officer of each Class A Member (or his or her physician designees), and (iii) one individual representing the nursing leadership of each Class A Member's respective emergency department as designated by the respective Class A Member. Upon the effective date of these Bylaws set forth in Section 5 of Article IX below, the initial members of the Medical Advisory Committee shall be the individuals set forth on Exhibit C attached. Each member of the Medical Advisory Committee

shall serve on the committee for one (1) year, unless sooner removed, and until his or her successor shall have been duly elected and qualified. The chairperson of the Medical Advisory Committee shall be a Class A Director of the Corporation, and such chairmanship shall rotate on an annual basis between the Class A Directors representing each Class A Member; provided, however, that so long as an employee contracted by or on the medical staff of one Class A Member serves as the Medical Director, the chairperson of the Medical Advisory Committee shall be designated by the other Class A Member.

Section 2. Regular and Special Committees. The Board of Directors, in its discretion, may establish from time to time other regular and special committees of the Board of Directors having the designations and functions specifically set forth by the Board of Directors. Such committees may exercise such powers, authority, responsibilities and duties as may be delegated or assigned to them by the Board of Directors in accordance with the Act. The Board of Directors may appoint individuals who are not directors of the Corporation to serve on such committees, provided, however, that any such committee shall consist of at least two (2) Class A Directors, that the respective Class A Members shall be equally represented on such committee, and that the chairperson of each such committee shall be a Class A Director of the Corporation.

Section 3. Requirements. The creation, appointment of members and operation of any and all committees of the Board of Directors shall be undertaken in accordance with the Act and all applicable provisions of Article III above.

ARTICLE VII

Financial. Audit and Related Matters

Section 1. Checks and Drafts. Since all finances are done by Franciscan Alliance there will be no need for checks, drafts, other orders or deposits for the payment of money.

Section 2. Audit Review Procedure. The annual audit of the operational activities of Franciscan Alliance on behalf of the Corporation shall be presented to the Chairperson and, thereafter, to the Board of Directors and members of the Corporation.

Section 3. Receipt of Gifts. Subject to the provisions of Article II relating to contributions by Class B Members, the Board of Directors may accept on behalf of the Corporation any donation of money or property, either inter vivos or testamentary, to be used for the benefit of the Corporation and, with the consent of the members of the Corporation, may designate any agency or foundation to receive, hold or administer such donation.

Section 4. Certain Services. The members acknowledge and agree that each of them, as part of their respective nonprofit health services systems, utilizes various administrative services provided by certain other affiliated entities. The Corporation may continue to utilize certain of such administrative services provided by certain member-affiliated entities as described herein. The officers of the Corporation may purchase without competitive bid from appropriate member-affiliated nonprofit entities, at the same rates charged to other member-affiliated entities, (i) information services, collection agency services, and group purchasing services; and (ii) professional liability and medical malpractice coverage. The management of the Corporation shall, from time to time, evaluate the fair market prices of the foregoing services purchased without competitive bid.

ARTICLE VIII

Indemnification and Conflicts of Interest

Section 1. Indemnification by the Corporation. To the fullest extent permitted by the Act or any other law, or, if not permitted, then to any extent not prohibited by the Act or any other law, the Corporation shall indemnify any person, and such person's heirs, executors,

administrators and legal representatives, who was or is made or threatened to be made a party to any claim, action, suit or proceeding (whether civil, criminal, administrative or investigative) by reason of the fact that (i) such person serves or served as a director, officer or member of the Corporation or (ii) such person serves or service on any formally constituted advisory body or voluntary committee of the Corporation or for the Board of Directors or (iii) such person serves or served at the request of the Corporation as a director, member, officer, shareholder, manager, partner, trustee, employee or agent of any other corporation, business corporation, partnership, joint venture, trust, association or any other enterprise against expenses (including attorney fees), judgments, fines and amounts paid in settlement actually and reasonably incurred by the person in connection with such action, suit or proceeding.

Section 2. Advancement of Expenses. Expenses incurred with respect to any claim, action, suit or proceeding may be advanced by the Corporation prior to the final disposition thereof upon receipt of an undertaking by or on behalf of the recipient to repay such amount unless he or she is entitled to indemnification.

Section 3. Purchase of Insurance. The Board of Directors is authorized and empowered to purchase insurance covering the Corporation's liabilities and obligations under this Article VIII and insurance protecting the Corporation's directors or officers or other persons.

Section 4. Conflicts of Interest. No director, officer, member or employee of the Corporation shall willfully become involved in any situation in which he or she may be subject to a conflict of interest and each director, officer, member or employee shall make every effort to avoid the appearance of such conflict of interest. It shall be the duty of any director, officer, member or employee who finds such condition possible to inform the Corporation and the Board of Directors fully about such condition. Any director who has a financial interest in any way in

any matter under consideration by the Board of Directors, or any committee thereof, shall be disqualified from participating in deliberations involving such matter and shall excuse himself or herself from the room while such deliberations and voting are underway. Any person who serves on any formally constituted advisory body or voluntary committee of the Corporation shall have the same duty under this Section 4. The Corporation shall not enter into any business relationship with any non tax exempt enterprise that is owned, operated or controlled, directly or indirectly, by a director, officer, member or employee of the Corporation, or any of their respective agents or family members, without full prior disclosure to the Board of Directors of the Corporation of the terms, conditions and costs associated with such relationship. Notwithstanding the foregoing, any director, officer, member or employee of the Corporation involved, either directly or indirectly, in the provision of certain services to the Corporation without competitive bid from member-affiliated nonprofit entities pursuant to Section 5 of Article VII above, shall be exempted from the provisions of this Section 4 with respect to the provision of such services only. The Board of Directors shall ensure the annual completion of a Conflict of Interest Statement (Exhibit D) by all Board Members, Officers, Managers, Medical Directors, and any other individuals with the authority to make financial decisions and enter into agreements on behalf of the organization.

ARTICLE IX

Miscellaneous

Section 1. Books and Records. The books and records of the Corporation shall be kept at the principal office of Franciscan Alliance in Lafayette, Indiana.

Section 2. Seal. The Board of Directors may adopt a corporate seal for the Corporation which shall be circular in form and mounted upon a metal die, suitable for

impressing on paper, and which shall have inscribed thereon the name of the Corporation and the words "Corporate Seal, Indiana." Any such corporate seal may be used by causing it or a facsimile thereof to be impressed, affixed or in any manner reproduced.

Section 3. Amendments. Subject to the provisions of Section 2 of Article III above, these Bylaws may be altered, amended or repealed in whole or in part and new bylaws may be adopted by a vote of the Class A members of the Board of Directors at a regular or special meeting, provided, however, that notice of such meeting shall contain notice of such proposed changes and, provided further, that any such alteration, amendment or repeal must be approved by the members of the Corporation.

Section 4. Successors. The duties, obligations, interests, rights, responsibilities and functions of Franciscan Alliance and IU Health and the members of the Corporation under these Bylaws shall inure to the benefit of and be binding upon their respective successors at 12:01 a.m. on the effective date of any such succession in interest.

Section 5. Effective Date. The effective date of these Bylaws is _____, 2013.

DATED:

_____, 2013

ADOPTED:

By: _____

Name: _____
Title: Chairperson

By: _____

Name: _____
Title: Secretary

Amended December 17, 2013 and April 22, 2014, Section 2. Administrative Titles. February 18, 2015, Exhibits A, B, C. June 9, 2015, Exhibits A, B, C

EXHIBIT A

Directors - Effective June 9, 2015

Franciscan Alliance Class A Directors (2): Jim Siemers (COO), Daniel Wickert, MD (CMO)

IU Health Class A Directors (2): Brian T. Shockney, (COO), Cara Breidster (CFO)

Tippecanoe County, Indiana Class B Director (1): Tom Murtaugh – County Commissioner

City of Lafayette, Indiana Class B Director (1): Richard Doyle

City of West Lafayette, Indiana Class B Director (1): Timothy Heath

Amended December 17, 2013 and April 22, 2014, Section 2. Administrative Titles. February 18, 2015, Exhibits A, B, C. June 9, 2015, Exhibits A, B, C

EXHIBIT B

Officers of the Board of Directors and Corporation Effective June 9, 2015

Chairperson: Jim Siemers

Vice Chairperson: Brian T. Shockney

Secretary: Daniel Wickert, MD

Treasurer: Ms. Cara Breidster

EXHIBIT C

June 9, 2015 Members of the Medical Advisory Committee

Franciscan Alliance (1): Daniel Wickert, MD (Chairperson)

IU Health (1): Brian Shockney (Vice Chairperson)

IU Health (1): Kishan Patel, MD

Franciscan Alliance ED/RN (1): Regina Nuseibeh

IU Health ED/RN (1): Amanda Rardon, RN

EXHIBIT D

Conflict of Interest Policy and Certification

Tippecanoe Emergency Ambulance Service, Inc.
Conflict of Interest Policy

SUBJECT: **Conflict of Interest**

PREFACE: All business transactions must be conducted with honesty and integrity. Transactions between all interested persons and healthcare providers must be just and reasonable. Interested persons must refrain from self-dealing and avoid conflict of interest situations.

PURPOSE: The purpose of the conflict of interest policy is to protect the Corporation's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Corporation. This policy is intended to supplement but not replace any applicable state laws governing conflict of interest applicable to nonprofit and charitable corporations.

POLICY: The Board of Directors of Tippecanoe Emergency Ambulance Service, Inc. requires members of the Corporation, members of the Board, employees, and committee members to declare in writing a list of all business or other organizations of which she/he or any of her/his immediate family member is an officer, member, 5% or more owner, or employee for which she/he acts as an agent, with which the Corporation or any of its healthcare facilities or other subsidiary corporations has, or might reasonably in the future enter into, a relationship or a transaction in which the declarant would have conflicting interests.

DEFINITIONS **Interested Person:** Any director, principal officer, or member of a committee with board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person. If a person is an interested person with respect to any entity in the health care system of which the Corporation is a part, she/he is an interested person with respect to all entities in the health care system.

Financial Interest: A person has a financial interest if the person has, directly or indirectly, through business, investment, or family –

- An ownership or investment interest in any entity with which the Corporation has a transaction or arrangement, or
- A compensation arrangement with the Corporation or with any entity or individual with which the Corporation has a transaction or arrangement, or
- A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Corporation is negotiating a transaction or arrangement. Compensation includes direct

and indirect remuneration as well as gifts or favors that are substantial in nature.

A financial interest is not necessarily a conflict of interest. Any person who has a financial interest may have a conflict of interest only if the appropriate board or committee decides that a conflict of interest exists.

PROCEDURE:

A. Duty to disclose: In connection with any actual or possible conflicts of interest, an interested person must disclose the existence and nature of her/his financial interest to the directors and members of committees with board delegated powers considering the purposed transactions or arrangements.
B. Determining Whether a Conflict of Interest Exists: After disclosure of the financial interest, the interested person shall leave the board or committee meeting while the financial interest is discussed and vote taken. The remaining board or committee members shall decide if a conflict of interest exists.
C. Addressing the Conflict of Interest:
    1. An interested person may make a presentation at the board or committee meeting, but after such presentation, she/he shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement that results in the conflict of interest.
    2. The chairperson of the board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
    3. After exercising due diligence, the board or committee shall determine whether the Corporation can obtain a more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest.
    4. If a more advantageous transaction or arrangement is not reasonably attainable under circumstances that would not give rise to a conflict of interest, the board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Corporation's best interest and for its own benefit and whether the transaction is fair and reasonable to the Corporation and shall make its decision as to whether to enter into the transaction or arrangement in conformity with such determination.
D. Violation of the Conflict of Interest Policy
    1. If the board or committee has reasonable cause to believe that a member has failed to disclose actual or possible conflicts of interest, it

shall inform the member of the basis of such belief and afford the member an opportunity to explain the alleged failure to disclose.

2. If, after hearing the response of the member and making such further investigation as may be warranted in the circumstances, the board or committee determines that the member has in fact failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

E. Records of Proceedings – The minutes of the board and all committees with board-delegated powers shall contain:
   1. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or potential conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the board's or committee's decision as to whether a conflict of interest in fact existed.
   2. The names of the persons who were present for discussion and cotes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection therewith.

F. Compensation
   1. A voting member of the board of directors who receives compensation, directly or indirectly, from the corporation for services is precluded from voting on matters pertaining to that member's compensation.
   2. A voting member of any committee whose jurisdiction included compensation matters and who receives compensation, directly or indirectly, from the Corporation for services is precluded from voting on matters pertaining to that member's compensation.

G. Annual Statements – Each director, principal officer and member of a committee with board designated powers shall annually sign a statement which affirms that such person:
   1. has received a copy of the conflict of interest policy,
   2. has read and understands the policy,
   3. has agreed to comply with the policy, and
   4. understands that the Corporation is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities, which accomplish one or more of its tax-exempt purposes.

H. Periodic Reviews – To make certain that the Corporation operates in a manner consistent with its charitable purposes and that it does not engage in activities that could jeopardize its status as an organization exempt from federal income tax, periodic reviews shall be conducted. The periodic review shall, at minimum, include the following subjects:
    1. Whether compensation arrangements and benefits are reasonable and is the result of an arm's-length bargaining.
    2. Whether partnership and joint venture arrangements and arrangements with management service organizations and physician hospital organizations conform to written policies, are properly recorded, reflect reasonable payments for goods and services, further the Corporation's charitable purposes and do not result in inurement or impermissible private benefit.
    3. Whether agreements to provide health care and agreements with other health care providers, employees, and third party payors further the Corporation's charitable purposes and do not result in in inurement or impermissible private benefit.

I. Use of Outside Experts – In conducting the periodic reviews provided for in (H), the Corporation may , but need not, use outside advisors. If outside experts are used, their use shall not relieve the board of its responsibility for ensuring that periodic reviews are conducted.

Amended December 17, 2013 and April 22, 2014, Section 2. Administrative Titles.
February 18, 2015, Exhibits A, B, C. June 9, 2015, Exhibits A, B, C

CONFLICT OF INTEREST
ANNUAL DECLARATION

I have read, understand, and agree to abide by the Corporation's Conflict of Interest Policy.

I agree that at such time any matter comes before a meeting of the Corporation in such a way as to give rise to a conflict of interest, I shall make known the potential conflict, whether or not disclosed on this written declaration, and after answering any questions that might be asked, withdraw from the meeting for so long as the matter shall continue under discussion. Should the matter be brought to a vote, I shall not vote on it. Notwithstanding the foregoing, it is understood that my relationship as a member, director, officer, employee or agent of Tippecanoe Emergency Ambulance Service, Inc. does not constitute a conflict of interest under the Corporation's Conflict of Interest Policy, and I hereby confirm that such relationship will not divert me from my duty to further the interest of the Corporation.

The following is a list of all business or other organizations of which I, or any member of my immediate family is an officer, member, 5% or more owner, or employee or for which she/he acts as an agent, with which the Corporation or any of its hospitals or other subsidiary corporations has, or might reasonably in the future enter into a financial relationship or transaction in which I would have a conflicting interest. Should any additional conflict of interest later arise, I agree to provide immediate notice thereof to the Corporation.

If no conflict exists, write "None".

1._____

2._____

3._____

4._____

_____ Date: _____
Signature

_____
Printed Name

EXHIBIT E

Director's Limited Proxy

_____*(board members name)*, a Director of Tippecanoe Emergency Ambulance Service, Inc. herewith appoints and designates as my proxy _____*(print name of Director as proxy holder)*, a duly appointed and current Director for a meeting of the Board of Directors scheduled for _____, with the full right and authority to vote in my place provided, however, that there is no right of substitution. For attendance and quorum purposes, I should be counted as in attendance.

_____ I authorize and instruct my proxy to use his or her best judgment on all matters which properly come before the meeting and for which a general power may be used.

_____ I specifically authorize and instruct my proxy holder to cast my vote in reference to the following matters as indicated below: *(indicate specific questions or issues to be voted on)*

_____

_____ _____
(Signature of Designated Director/Proxy) (Date)

_____ _____
(Signature of Director authorizing proxy) (Date)

TIPPECANOE EMERGENCY AMBULANCE SERVICES, INC.
FORM 1023 APPLICATION

EXHIBIT C - FORM 2848

Form **2848** (Rev. January 2021)
Department of the Treasury
Internal Revenue Service

Power of Attorney and Declaration of Representative

▶ Go to *www.irs.gov/Form2848* for instructions and the latest information.

OMB No. 1545-0150

For IRS Use Only
Received by:
Name
Telephone
Function
Date / /

Part I Power of Attorney

Caution: A separate Form 2848 must be completed for each taxpayer. Form 2848 will not be honored for any purpose other than representation before the IRS.

1 Taxpayer information. Taxpayer must sign and date this form on page 2, line 7.

Taxpayer name and address	Taxpayer identification number(s)	
TIPPECANOE EMERGENCY AMBULANCE SERVICES, INC. 1701 SOUTH CREASY LANE LAFAYETTE, IN 47904	46-3253742	
	Daytime telephone number 317-250-1460	Plan number (if applicable)

hereby appoints the following representative(s) as attorney(s)-in-fact:

2 Representative(s) must sign and date this form on page 2, Part II.

Name and address	CAF No. / PTIN / Telephone No. / Fax No. / Check if new
ERIC M. MCNEIL, PWC US TAX LLP 2001 MARKET STREET, SUITE 1800 **Check if to be sent copies of notices and communications** ☒	CAF No. 0200-07413R PTIN P00460263 Telephone No. (267) 977-0790 Fax No. Check if new: Address ☐ Telephone No. ☐ Fax No. ☐
LINDSAY B. JOHNSON, PWC US TAX LLP 2001 MARKET STREET, SUITE 1800 **Check if to be sent copies of notices and communications** ☒	CAF No. 031562757R PTIN P02455898 Telephone No. (267) 254-7596 Fax No. 918-574-6176 Check if new: Address ☐ Telephone No. ☐ Fax No. ☐
Name and address (**Note:** IRS sends notices and communications to only two representatives.)	CAF No. PTIN Telephone No. Fax No. Check if new: Address ☐ Telephone No. ☐ Fax No. ☐
Name and address (Note: IRS sends notices and communications to only two representatives.)	CAF No. PTIN Telephone No. Fax No. Check if new: Address ☐ Telephone No. ☐ Fax No. ☐

to represent the taxpayer before the Internal Revenue Service and perform the following acts:

3 Acts authorized (you are required to complete line 3). Except for the acts described in line 5b, I authorize my representative(s) to receive and inspect my confidential tax information and to perform acts I can perform with respect to the tax matters described below. For example, my representative(s) shall have the authority to sign any agreements, consents, or similar documents (see instructions for line 5a for authorizing a representative to sign a return).

Description of Matter (Income, Employment, Payroll, Excise, Estate, Gift, Whistleblower, Practitioner Discipline, PLR, FOIA, Civil Penalty, Sec. 4980H Shared Responsibility Payment, etc.) (see instructions)	Tax Form Number (1040, 941, 720, etc.) (if applicable)	Year(s) or Period(s) (if applicable) (see instructions)
FORM 1023 APPLICATION FOR EXEMPTION	1023	N/A

4 Specific use not recorded on the Centralized Authorization File (CAF). If the power of attorney is for a specific use not recorded on CAF, check this box. See *Line 4. Specific Use Not Recorded on CAF* in the instructions . . . . . ▶ ☐

5a Additional acts authorized. In addition to the acts listed on line 3 above, I authorize my representative(s) to perform the following acts (see instructions for line 5a for more information): ☐ Access my IRS records via an Intermediate Service Provider;
☐ Authorize disclosure to third parties; ☒ Substitute or add representative(s); ☐ Sign a return; AUTHORITY IS HEREBY PROVIDED TO SUBSTITUTE OR DELEGATE AUTHORITY TO OTHER REPRESENTATIVES.

☒ Other acts authorized: AUTHORITY IS HEREBY GRANTED FOR REPRESENTATIVES TO E-FILE ON BEHALF OF THE TAXPAYER AND FOR REPRESENTATIVES TO SEND AND RECEIVE DOCUMENTS BY FAX.

b **Specific acts not authorized.** My representative(s) is (are) not authorized to endorse or otherwise negotiate any check (including directing or accepting payment by any means, electronic or otherwise, into an account owned or controlled by the representative(s) or any firm or other entity with whom the representative(s) is (are) associated) issued by the government in respect of a federal tax liability.
List any other specific deletions to the acts otherwise authorized in this power of attorney (see instructions for line 5b):

6 **Retention/revocation of prior power(s) of attorney.** The filing of this power of attorney automatically revokes all earlier power(s) of attorney on file with the Internal Revenue Service for the same matters and years or periods covered by this form. If you do not want to revoke a prior power of attorney, check here . . . . . ▶ ☐

YOU MUST ATTACH A COPY OF ANY POWER OF ATTORNEY YOU WANT TO REMAIN IN EFFECT.

7 **Taxpayer declaration and signature.** If a tax matter concerns a year in which a joint return was filed, each spouse must file a separate power of attorney even if they are appointing the same representative(s). If signed by a corporate officer, partner, guardian, tax matters partner, partnership representative (or designated individual, if applicable), executor, receiver, administrator, trustee, or individual other than the taxpayer, I certify I have the legal authority to execute this form on behalf of the taxpayer.

▶ **IF NOT COMPLETED, SIGNED, AND DATED, THE IRS WILL RETURN THIS POWER OF ATTORNEY TO THE TAXPAYER.**

Signature	Date	Title (if applicable)
	03/28/2024	

Print name	Print name of taxpayer from line 1 if other than individual
JAMES M. SIEMERS	TIPPECANOE EMERGENCY AMBULANCE SERVICES, INC.

Part II Declaration of Representative

Under penalties of perjury, by my signature below I declare that:

- I am not currently suspended or disbarred from practice, or ineligible for practice, before the Internal Revenue Service;
- I am subject to regulations in Circular 230 (31 CFR, Subtitle A, Part 10), as amended, governing practice before the Internal Revenue Service;
- I am authorized to represent the taxpayer identified in Part I for the matter(s) specified there; and
- I am one of the following:

a Attorney—a member in good standing of the bar of the highest court of the jurisdiction shown below.

b Certified Public Accountant—a holder of an active license to practice as a certified public accountant in the jurisdiction shown below.

c Enrolled Agent—enrolled as an agent by the IRS per the requirements of Circular 230.

d Officer—a bona fide officer of the taxpayer organization.

e Full-Time Employee—a full-time employee of the taxpayer.

f Family Member—a member of the taxpayer's immediate family (spouse, parent, child, grandparent, grandchild, step-parent, step-child, brother, or sister).

g Enrolled Actuary—enrolled as an actuary by the Joint Board for the Enrollment of Actuaries under 29 U.S.C. 1242 (the authority to practice before the IRS is limited by section 10.3(d) of Circular 230).

h Unenrolled Return Preparer—Authority to practice before the IRS is limited. An unenrolled return preparer may represent, provided the preparer (1) prepared and signed the return or claim for refund (or prepared if there is no signature space on the form); (2) was eligible to sign the return or claim for refund; (3) has a valid PTIN; and (4) possesses the required Annual Filing Season Program Record of Completion(s). **See Special Rules and Requirements for Unenrolled Return Preparers *in the instructions for additional information.***

k Qualifying Student or Law Graduate—receives permission to represent taxpayers before the IRS by virtue of his/her status as a law, business, or accounting student, or law graduate working in a LITC or STCP. See instructions for Part II for additional information and requirements.

r Enrolled Retirement Plan Agent—enrolled as a retirement plan agent under the requirements of Circular 230 (the authority to practice before the Internal Revenue Service is limited by section 10.3(e)).

▶ **IF THIS DECLARATION OF REPRESENTATIVE IS NOT COMPLETED, SIGNED, AND DATED, THE IRS WILL RETURN THE POWER OF ATTORNEY. REPRESENTATIVES MUST SIGN IN THE ORDER LISTED IN PART I, LINE 2.**

Note: For designations d–f, enter your title, position, or relationship to the taxpayer in the "Licensing jurisdiction" column.

Designation—Insert above letter (a–r).	Licensing jurisdiction (State) or other licensing authority (if applicable)	Bar, license, certification, registration, or enrollment number (if applicable)	Signature	Date
a	PA	86151	Eric M. McNeil	3/27/2024
a	PA	332307	Lindsay Johnson	3/27/2024

TIPPECANOE EMERGENCY AMBULANCE SERVICES, INC.
FORM 1023 APPLICATION

EXHIBIT D - Supplemental Responses

Part I, Line 8

Tippecanoe Emergency Ambulance Services, Inc. (TEAS) full website address is: www.franciscanhealth.org/patient-resouces/programs-and-support/teas

Part IV, Line 1

Tippecanoe Emergency Ambulance Services, Inc. (TEAS) will provide the community with 24-hour, state-of-the-art emergency care and treatment of ill and injured patients in the pre-hospital setting in Tippecanoe County in Indiana. Also, TEAS provides governance for emergent transportation, pre-hospital care incident to emergent transportation, and medical transport services. TEAS provides leadership and facilitates coordination in the provision of ambulance services and other services related thereto, including professional education, research, centralized strategic planning, capital finance, marketing, entering into mutual aid agreements, securing accreditation of the ambulance services, and such other administrative and management activities as identified in order to enhance quality, reduce unnecessary duplication resources, and increase efficiencies in the provision of ambulance services in Tippecanoe County.

TEAS's service area covers 500 square miles, and it will serve the pre-hospital emergency medical needs of more than 186,000 city and county residents, in addition to the many visitors and travelers through Tippecanoe County. TEAS will also respond to police and fire standbys for all volunteer and paid departments in Tippecanoe County. TEAS also will transfer distressed newborns from hospitals in the surrounding counties to a Level III Neonatal Intensive Care Unit.

TEAS will staff the following: (i) four paramedic ALS ambulances, 24 hours a day, seven days a week, (ii) one ambulance 16 hours a day, (iii) one paramedic ALS ambulance 12 hours a day, seven days a week, and (iv) two administrative chase cars staffed 24 hours a day, seven days a week. The emergency ambulances are staffed by at least one Emergency Medical Technician and one paramedic according to state statutes.

Moreover, TEAS will provide various training activities. Specifically, pre-hospital emergency medicine is still a relatively new field in medicine. Therefore, emergency personnel are required to continually expand their knowledge base to stay current on the latest life-saving techniques. Their expertise must span from infants to the elderly patient, each with his or her own needs and influenced by many multicultural backgrounds. TEAS will provide professional education opportunities to meet these needs. In addition, TEAS will operate an EMS Ambulance Sim Lab. The EMS Ambulance Sim Lab features everything you would have on an ambulance still in use. This EMS Ambulance Sim Lab is used for training new hires but is also available for use by anyone who wants to do pre-hospital first aid training that works with TEAS, like volunteer fire departments, paid fire departments, etc.

In Revenue Ruling 74- 361, 1974-2 C.B. 159, the IRS found that a nonprofit organization that was organized and operated as a fire company to provide fire protection and ambulance and rescue services to a community qualified for exemption as a charitable organization under IRC section 501(c)(3). In that ruling, the IRS cited that the provision of fire and rescue service for the general community has been held to be a charitable purpose because it lessens the burden of government. See, e.g., Sherman v. Richmond Hose Co., 130 N.E. 613 (1921); Magill v. Brown, Fed. Case No. 8952 (C.C. E.D. Pa., 1833); Roy G. McKenna, 5 T.C. 712 (1945), acq., 1950-2 C.B. 3.

Through providing ambulance services to the Tippecanoe County community, TEAS is lessening government burdens of government. Moreover, TEAS is providing education on pre-medical emergency medicine to emergency personnel as well as providing access to the EMS Ambulance Sim Lab. All these activities are charitable purposes within the meaning of IRC section 501(c)(3).

TEAS was incorporated in 2013, but it had no activity since its incorporation through the filing of this application. The ambulance services have been provided by one of its members, Franciscan Alliance, Inc., through its division Franciscan Health – Lafayette. Franciscan Alliance, Inc. is exempt from Federal

income tax under IRC section 501(a) because it is described in IRC section 501(c)(3). TEAS will be initially funded through a contribution by Franciscan Alliance, Inc. of cash, equipment, and other fixed assets.

Part VI, Line 23/Line 25, Itemized Financial Data

Description	From: 01/01/2024 To: 12/31/2024	From: 01/01/2025 To: 12/31/2025	From: 01/01/2026 To: 12/31/2026	From: 01/01/2027 To: 12/31/2027	From: 01/01/2028 To: 12/31/2028
Total Line 23	**1,350,000**	**1,377,000**	**1,403,000**	**1,431,000**	**1,459,000**

Line 25, Itemized Financial Data

Description	From: 01/01/2024 To: 12/31/2024	From: 01/01/2025 To: 12/31/2025	From: 01/01/2026 To: 12/31/2026	From: 01/01/2027 To: 12/31/2027	From: 01/01/2028 To: 12/31/2028
Drugs & Pharmaceuticals	31,000	31,000	31,000	31,000	31,000
Medical Supplies	244,000	256,000	268,000	281,000	294,000
Utilities	7,000	7,000	7,000	7,000	7,000
Repairs and Maintenance	80,000	80,000	80,000	80,000	80,000
Purchased Services	373,000	382,000	391,000	400,000	409,000
Insurance	133,000	133,000	133,000	133,000	133,000
Other Expense	482,000	488,000	493,000	499,000	505,000
Total Line 25	**1,350,000**	**1,377,000**	**1,403,000**	**1,431,000**	**1,459,000**