

ATTACHMENT "C"

2500 AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

Before me, the undersigned authority, personally appeared Christian A. Yepes ("Affiant"), who, being first duly sworn, says:

1. That Affiant is a Manager of 2500-34Th ST, LLC, a Florida limited liability company ("2500"), and is authorized to make this Affidavit on 2500's behalf.

2. That 2500 is the "Developer" under that certain "Developer's Ground Lease Reservation Agreement With An Option To Purchase" between 2500 and Pinellas County (the "County") and is the "Landlord" under that certain "Lease With Option to Purchase" between 2500 and the County (collectively "the Leases"). Both Leases affect the real property (the "Property") which is more particularly described on Exhibit "A" hereto

3. That since the effective date of those Leases, being the same date County acquired fee title to the Property, there have been no documents recorded in the Public Records of the County by or at the direction of 2500, other than those documents related to the Iberia Bank Loan to 2500 which is being satisfied in connection with the transaction for which this Affidavit is given. The foregoing excludes documents requested of 2500 by third parties and executed by County as part of the development and construction of the Building and Improvements for the County under the Leases.

4. That there are no mechanics', materialmen's' or laborers' liens against the Property, or any part thereof, which liens would have been created or incurred by virtue of an obligation of 2500, and that no contractor, subcontractor, laborer, materialman, architect, engineer or surveyor has any lien or right to lien against the Property, or any part thereof, by virtue of any unpaid obligation created or incurred by 2500.

5. That there are no claims, demands, contract rights, liens or judgments outstanding against the Property by virtue of any obligation of 2500, and that 2500 is not indebted to anyone for the Property except Iberia Bank, whose lien will be released simultaneously with the closing of the transaction for which this Affidavit is given.

6. That to the best of Affiant's knowledge there are no easements or claims of easements on the Property not shown in the Public Records of the County.

7. That to the best of Affiant's knowledge there are no outstanding rights or claims of any parties in possession not shown on the Public Records of the County except the County.

8. That this Affidavit is given to induce County to close the purchase of 2500's interest in the improvements on the Property pursuant to its exercise of it Option to Purchase in the "Lease With Option to Purchase".

9. That Section 1445 of the Internal Revenue Code of 1954, as amended (“Code”), provides that a transferee of a United States real property interest (as defined in Section 897(c) of the Code) must withhold a tax equal to ten percent (10%) of the amount realized on the transfer if the transferor is a foreign person as defined in the Code. For U.S. tax purposes (including Section 1445) the owner of a disregarded entity (which has legal title to a U.S. real property interest under local law) will be the transferor of the property and not the disregarded entity. To inform the transferee that withholding of tax is not required upon the disposition of a U.S. real property interest by 2500, the undersigned hereby certifies the following to the transferee of title to the Property, the title agent and the closing agent on behalf of 2500:

(a) That 2500 is the owner of such a United States real property interest described above.

(b) That Owner is not a foreign corporation, foreign partnership, foreign trust, foreign estate or foreign person (as those terms are defined in the Internal Revenue Code and Income Tax Regulations promulgated thereunder);

(c) That Owner is not a disregarded entity as defined in § 1.1445-2(b)(2)(iii);

(d) That Owner’s United States taxpayer identification number is 47-5256078.

(e) That Owner’s primary address is 6654 – 78th Avenue N., Pinellas Park, FL 33781.

(f) That this Affidavit and/or the contents hereof may be disclosed to the Internal Revenue Service by the transferee.

Christian A. Yepes

Sworn to and subscribed before me by means of ☐ physical presence or ☐ on-line notarization, this ___ day of _____, 2024, by Christian A. Yepes, who ☐ is personally known to me or ☐ has produced his Florida Driver’s License as identification.

(Affix Notary Seal)

NOTARY PUBLIC

Print Name: _____