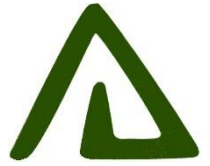




**Your Outdoor Classroom – River Otters**  
328 Bethel Road, Fincastle, Virginia 24090  
YourOutdoorClassroom@gmail.com  
www.CampBethelVirginia.org/YOC



Pursuant to your request, the purpose of this letter is to explain why, in our view, our company is exempt from registering in Ohio under Chapter • 1706 of the Ohio Revised Code (ORC).

\_\_ Camp Bethel \_\_ is an \_\_ 501c \_\_ limited liability company with offices at \_\_ Fincastle, Va \_\_ that develops, markets and sells products to customers around the world.

Camp Bethel \_\_ does not have any offices or employees in Ohio and does not conduct a substantial part of its business in Ohio. Thus, in our view, our operations do not meet the definition of "transacting business" in the state under ORC §1706.512.

Ohio courts have held that a foreign entity is transacting business in the state when it engages in "some substantial part of its ordinary or customary business, usually continuous in the sense that it may be distinguished from merely casual, sporadic, or occasional transactions and isolated acts," and that "a foreign corporation's activities must be permanent, continuous, and regular to constitute 'doing

Business.'" (see, e.g., Premier Capital, L.L. C. v. Baker, 972 N.E.2d 1125, 1131 (Ohio App. 11th Dist. 2012)).

Since \_\_ Paddlesports \_\_ activities in Ohio do not constitute "transacting business" in the state, it is our position that we are not required to register as a foreign LLC. If you have any questions, please contact Hannah Jarrett, the undersigned, at \_\_ 540-556-2594 or 540-992-2940 \_\_.

Signed,

Date:

June 10, 2026