

**CERTIFIED COPY OF RESOLUTION OF  
COUNCIL OF THE TAXATION SECTION  
OF THE  
STATE BAR OF MICHIGAN**

WHEREAS, on April 23, 2018, a sub-committee, comprised of Mike Monaghan, Bill Lentine and Thomas Fabbri, recommended to council to make the following grants (collectively, the "Grants"):

- Accounting Aid Society's Low Income Taxpayer Clinic - \$1,667
- Michigan State University College of Law – Alvin L. Storrs Low-Income Taxpayer Clinic - \$1,667
- University of Michigan Low Income Taxpayer Clinic - - \$1,666

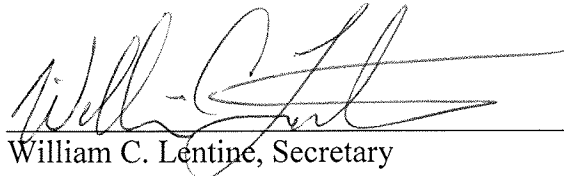
I, William C. Lentine, Secretary of the Council of the Taxation Section of the State Bar of Michigan, hereby certify that upon motion of Council Chair Carolee Smith, seconded by Council member Thomas Fabbri, the following resolution was adopted by the electronic vote of a majority of Council members entitled to vote following the circulation, in lieu of a meeting, of an electronic message describing the resolution to all members entitled to vote:

It is resolved that the Grants should be awarded as first written above.

Of the 14 voting members of the Council, the vote was:

In favor: 13  
Opposed: 0  
Abstaining: 1  
Not voting: 0

IN WITNESS WHEREOF, I have affixed my signature this 23 day of July, 2018.

  
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William C. Lentine, Secretary