STATE OF NORTH CAROLINA	IN THE GENERAL COURT OF JUSTICE
COUNTY OF CARTERET	SUPERIOR COURT DIVISION
	CASE NO. 22-CVS-446
AMBER STYRON,	
ADMINISTRATRIX OF THE ESTATE)
OF NOAH LEE STYRON,)
,)
Plaintiff,)
,) <u>COMPLAINT</u>
V.)
) (JURY TRIAL DEMANDED)
EDP MANAGEMENT GROUP, LLC;)
DILLON'S AVIATION, INC.; and)
GREEN ASSETS, INC.	DATE FILED: May 24, 2022
Defendants.	

NOW COMES Plaintiff AMBER STYRON, Administratrix of the ESTATE OF NOAH

LEE STYRON, complaining of the Defendants, and alleges and says as follows:

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PRELIMINARY STATEMENT

1. This is a wrongful death action seeking compensatory damages pursuant to N.C.G.S. § 28A-18-2 stemming from an airplane crash in Carteret County, North Carolina, on or about February 13, 2022, which resulted in the death of Noah Lee Styron.

PLAINTIFF

- 2. Plaintiff Amber Styron brings this wrongful death action in her fiduciary capacity as Administratrix of the Estate of Noah Lee Styron, deceased.
- 3. Plaintiff Amber Styron was duly appointed as Administratrix of the Estate of Noah Lee Styron, deceased, on April 28, 2022, by the Carteret County Clerk of Superior Court.
 - 4. Plaintiff Amber Styron is a citizen and resident of Carteret County, North Carolina.

PLAINTIFF'S DECEASED

5. Plaintiff Amber Styron's deceased, Noah Lee Styron, age 15, died from injuries sustained in the subject airplane crash of February 13, 2022.

DEFENDANT EDP MANAGEMENT GROUP, LLC

- 6. Defendant EDP Management Group, LLC (hereinafter "EDP Management") is a Delaware Corporation with its principal place of business and headquarters located at 7655 Market St, Suite B, Wilmington, NC 28411-9458. *See* Exhibit A.
- 7. Defendant EDP Management's officers, directors, owners, and corporate activities are headquartered at 7655 Market St, Suite B, Wilmington, NC 28411-9458.
- 8. Defendant EDP Management may be served through its Registered Agent, Corporation Service Company, 1201 Hays Street, Tallahassee, FL, 32301-2525.
- 9. At all times relevant herein, Defendant EDP Management maintained its principal office within the State of North Carolina and regularly conducted and continues to conduct substantial business within the State of North Carolina.
- 10. At all times relevant herein, Defendant EDP Management has availed itself of the laws and jurisdiction of the State of North Carolina.
- 11. At all times relevant hereto, the subject aircraft was owned by Defendant EDP Management.
- 12. On February 13, 2022, at the time of the subject airplane crash, Ernest "Teen" Durwood Rawls was employed by EDP Management, and he was acting within the course and scope of his employment with EDP Management when serving as the pilot-in-command of the subject aircraft.

DEFENDANT DILLON'S AVIATION, INC.

- 13. Defendant Dillon's Aviation, Inc. (hereinafter "Dillon's Aviation") is a North Carolina corporation with its principal place of business located at 1105 N. Memorial Drive, Greenville, NC 27834-1404. *See* Exhibit B.
- 13. At all relevant times, Defendant Dillon's Aviation maintained its principal office within the State of North Carolina and regularly conducted and continues to conduct substantial business activities within the State of North Carolina.
- Defendant Dillon's Aviation may be served through its Registered Agent, Stuart D.
 Dillon, 1105 N. Memorial Drive, Greenville, NC 27824-1404.
- 15. On February 13, 2022, at the time of the subject airplane crash, Ernest "Teen" Durwood Rawls was employed by Defendant Dillon's Aviation, and he was acting within the course and scope of his employment with Defendant Dillon's Aviation when serving as the pilotin-command of the subject aircraft.
- 16. On February 13, 2022, at the time of the subject airplane crash, Ernest "Teen" Durwood Rawls was employed by Defendant Dillon's Aviation, and he was acting within the course and scope of his employment with Defendant Dillon's Aviation when serving as an instructor for student pilot Jeffery Worthington Rawls at the time of the subject aircraft.

DEFENDANT GREEN ASSETS, INC.

- 17. Defendant Green Assets, Inc. (hereinafter "Green Assets") is a Delaware corporation with its principal place of business and global headquarters located at 7655 Market Street, Wilmington, NC 28411-9458. *See* Exhibit C.
- 18. Defendant Green Asset's officers, directors, owners, and corporate activities are headquartered at 7655 Market St, Suite B, Wilmington, NC 28411-9458.

- 19. Defendant Green Assets shares a principal place of business and headquarters with Defendant EDP Management.
- 20. Defendant Green Assets may be served through its Registered Agent, Bailey Evans,7655 Market St., Wilmington, NC 28441-9458.
- 21. At all times relevant herein, Defendant Green Assets maintained its principal office within the State of North Carolina and regularly conducted substantial business activities within the State of North Carolina.
- 22. At all times relevant herein, Defendant Green Assets has availed itself to the laws and jurisdiction of the State of North Carolina.
- 23. On February 13, 2022, at the time of the subject airplane crash, Ernest "Teen" Durwood Rawls was employed by Defendant Green Assets, and Ernest "Teen" Durwood Rawls was acting within the course and scope of his employment with Defendant Green Assets when serving as the pilot-in-command of the subject aircraft.

IDENTIFICATION OF AIRCRAFT

- 24. This subject aircraft involved in this action is a 2017 Pilatus Aircraft LTD PC-12/47E, tail number N79NX.
 - 25. All times pertinent hereto, the subject aircraft was owned by EDP Management.

JURISDICTION

- 26. This Court has jurisdiction over the subject matter and causes of action complained of herein.
- 27. Pursuant to N.C.G.S. §1-75.4, this Court has personal jurisdiction over all Defendants named in this action

- 28. All Defendants in this action are residents and/or corporations that maintain their principal place of business and/or corporate headquarters in North Carolina. All Defendants to this action perform substantial business activities within the State of North Carolina.
 - 29. All Defendants are residents of North Carolina.
 - 30. Plaintiff is a citizen and resident of the State of North Carolina.
- 31. Defendant EDP Management maintains its principal place of business in North Carolina, and North Carolina is the place where its officers direct, control, and coordinate the corporation's activities. Jurisdiction over EDP Management in North Carolina is proper under N.C.G.S. § 1-75.4.
- 32. Defendant Green Assets maintains its principal place of business in North Carolina, and North Carolina is the place where its officers direct, control, and coordinate the corporation's activities. Jurisdiction over Defendant Green Assets in North Carolina is proper under N.C.G.S. § 1-75.4.
- 33. Defendant Dillon's Aviation maintains its principal place of business in North Carolina, and North Carolina is the place where its officers direct, control, and coordinate the corporation's activities. Jurisdiction over Defendant Dillon's Aviation in North Carolina is proper under N.C.G.S. § 1-75.4.
- 34. The subject airplane crash occurred on February 13, 2022 in Carteret County, North Carolina.

VENUE

35. Venue is proper in Carteret County Superior Court. *See* N.C.G.S. § 1-80; N.C.G.S. §1-82.

36. The Superior Court division is the proper division for the trial of this action because the amount in controversy exceeds the sum of twenty-five thousand dollars (\$25,000). *See* N.C.G.S. § 7A-243.

GENERAL ALLEGATIONS

Plaintiff re-alleges and re-incorporates the allegations in paragraphs 1-36.

- 37. On or about February 13, 2022, Noah Lee Styron was a passenger on the subject aircraft, tail no. N79NX.
- 38. The subject flight was piloted by Ernest "Teen" Durwood Rawls and Mr. Rawls' son, Jeffrey Worthington Rawls, who was acting as a student pilot during the subject flight and was seated in the right seat of the cockpit.
- 39. At approximately 1:35 p.m., the subject aircraft departed from Hyde County Airport (7W6) in Engelhard, North Carolina, en route to Michael J. Smith Airport (MFH) in Beaufort, North Carolina.
- 40. At approximately 1:38 p.m., the air traffic controller advised the pilot of the subject aircraft that nearby restricted airspace was active. The pilot confirmed that the aircraft would remain clear of the restricted airspace.
- 41. At approximately 1:41 p.m., the controller called the pilot and indicated that the airplane was about to enter the restricted airspace. After multiple calls with no response from the pilot, the controller instructed the military aircraft in the restricted airspace to remain above 4,000 ft msl.
- 42. At approximately 1:49 p.m., the pilot called the controller and requested RNAV approach to MFH, but was denied the request because of the active restricted airspace. The controller also queried the pilot as to why he did not respond to the earlier radio calls, to which the

pilot responded that he "was trying to get out" and was unable to receive the radio transmissions.

- 43. At approximately 2:01 p.m., the controller called the airplane and asked what altitude it was at because the airplane was at 4,700 ft msl and climbing quickly. There was no response. Radar contact was lost with the airplane at 2:02 p.m. Throughout the communication with air traffic control, there were no distress calls or a declaration of emergency from the airplane.
- 44. The airplane impacted the Atlantic Ocean within three miles of the North Carolina coast, near Drum Inlet.
 - 45. Noah Lee Styron was fatally injured in the airplane crash.

FIRST CAUSE OF ACTION VICARIOUS LIABILITY OF DEFENDANT EDP MANAGEMENT GROUP, LLC

Plaintiff re-alleges and re-incorporates the allegations in paragraphs 1-45.

- 46. On February 13, 2022, at the time of the subject airplane crash, Ernest "Teen" Durwood Rawls was employed by Defendant EDP Management, and he was acting within the course and scope of his employment with Defendant EDP Management when serving as the pilotin-command of the subject aircraft.
- 47. Defendant EDP Management, by and through its agents and employees, had a duty to use the degree of care that an ordinarily careful and prudent company would use under the same or similar circumstances.
- 48. The employees and agents of Defendant EDP Management, including its employee Ernest "Teen" Durwood Rawls, owed a duty of reasonable, ordinary, and prudent care in the operation of the subject aircraft.
- 49. Defendant EDP Management is vicariously liable, by operation of law, for any and all acts or omissions of Ernest "Teen" Durwood Rawls for his negligent and careless piloting and operation of the subject airplane under the theories of *respondeat superior* and agency.

- 50. Defendant EDP Management is vicariously liable for Mr. Rawls' acts or omissions in the following respects:
 - a. Mr. Rawls failed to fly the subject aircraft safely;
 - b. Mr. Rawls failed to maintain control over the subject aircraft;
 - c. Mr. Rawls improperly flew into IFR conditions;
 - d. Mr. Rawls failed to properly avoid restricted airspace, leading to an erratic and irregular flight path;
 - e. Mr. Rawls failed to maintain adequate communication with air traffic control;
 - f. Mr. Rawls failed to conduct a proper weight and balance evaluation prior to take off;
 - g. Mr. Rawls' negligent piloting led to his subsequent spatial disorientation; and
 - h. Mr. Rawls failed to properly and safely operate the aircraft, resulting in a crash.
- 51. Defendant EDP Management's negligent breach of its duty to Plaintiff's decedent, by and through its employee or agent, caused the fatal injuries and resulting damages complained of herein.
- 52. Plaintiff's deceased, Noah Lee Styron, was killed as a direct and proximate cause of the negligent conduct of Defendant EDP Management by and through its employee agent, Mr. Ernest "Teen" Durwood Rawls.

SECOND CAUSE OF ACTION VICARIOUS LIABILITY OF DEFENDANT DILLON'S AVIATION, INC.

Plaintiff re-alleges and re-incorporates the allegations in paragraphs 1-52.

- 53. On February 13, 2022, at the time of the subject airplane crash, Ernest "Teen" Durwood Rawls was employed by Defendant Dillon's Aviation, and he was acting within the course and scope of his employment with Defendant Dillon's Aviation when serving as the pilotin-command of the subject aircraft.
- 54. During the subject flight, Mr. Rawls' son, Jeffrey Worthington Rawls, was seated in the cockpit at the right-hand seat.
- 55. During the subject flight, Jeffrey Worthington Rawls was acting as a student pilot. At the time of the subject crash, Mr. Worthington Rawls held a student pilot certificate and had reported twenty (20) hours of flight experience.
- 56. At all relevant times, Jeffery Worthington Rawls was a student of Defendant Dillion's Aviation.
- 57. During the subject flight, Mr. Rawls' training of the student pilot occurred pursuant to the course and scope of Mr. Rawls' employment as a flight instructor at Defendant Dillon's Aviation.
- 58. Defendant Dillon's Aviation, by and through its agents and employees, had a duty to use the degree of care that an ordinarily careful and prudent company would use under the same or similar circumstances.
- 59. The employees and agents of Defendant Dillion's Aviation, including its employee Ernest "Teen" Durwood Rawls owed a duty of reasonable, ordinary, and prudent care in the operation of the subject aircraft.

- 60. Defendant Dillon's Aviation is vicariously liable, by operation of law, for any and all actions of Ernest "Teen" Durwood Rawls, and/or its student pilot—Jeffery Worthington Rawls, for their negligent and careless piloting and operation of the subject airplane.
- 61. Defendant Dillon's Aviation is vicariously liable, by operation of law, for Mr. Rawls' act or omissions in the following respects:
 - a. Mr. Rawls failed to fly the subject aircraft safely;
 - b. Mr. Rawls failed to maintain control over the subject aircraft;
 - c. Mr. Rawls improperly flew into IFR conditions;
 - d. Mr. Rawls failed to properly avoid restricted airspace, leading to an erratic and irregular flight path;
 - e. Mr. Rawls improperly relied on a co-pilot with inadequate training and experience to fly around the restrict airspace, and to fly in the weather conditions that were present on the day of the subject flight;
 - f. Mr. Rawls' training of Jeffery Worthington Rawls during the subject flight diverted Mr. Rawls's attention from flying the aircraft safely;
 - g. Mr. Rawls failed to maintain adequate communication with air traffic control;
 - h. Mr. Rawls failed to conduct a proper weight and balance evaluation prior to take off;
 - i. Mr. Rawls' negligent piloting led to his subsequent spatial disorientation; and
 - j. Mr. Rawls failed to properly and safely operate the aircraft, resulting in a crash.
- 62. Defendant Dillon's Aviation's negligent breach of its duty to Plaintiff's decedent, by and through its employees and agents, caused the fatal injuries and resulting damages complained of herein.

63. Plaintiff's deceased, Noah Lee Styron, was killed as a direct and proximate cause of the negligent conduct of Defendant Dillion's Aviation by and through its employees or agents, Mr. Ernest "Teen" Durwood Rawls and Mr. Jeffrey Worthington Rawls.

THIRD CAUSE OF ACTION VICARIOUS LIABILITY OF DEFENDANT GREEN ASSETS, INC.

Plaintiff re-alleges and re-incorporates the allegations in paragraphs 1-63.

- 64. On February 13, 2022, at the time of the subject airplane crash, Ernest "Teen" Durwood Rawls was employed by Defendant Green Assets, and he was acting within the course and scope of his employment with Defendant Green Assets when serving as the pilot-in-command of the subject aircraft.
- 65. Defendant Green Assets scheduled the subject flight and requested that Mr. Rawls pilot the subject aircraft on February 13, 2022.
- 66. Defendant Green Assets, by and through its agents and employees, had a duty to use the degree of care that an ordinarily careful and prudent company would use under the same or similar circumstances.
- 67. The employees and agents of Defendant Green Assets, including its employee Ernest "Teen" Durwood Rawls owed a duty of reasonable, ordinary, and prudent care in the operation of the subject aircraft.
- 68. Defendant Green Assets is vicariously liable, by operation of law, for any and all acts or omissions of Ernest "Teen" Durwood Rawls for his negligent and careless piloting and operation of the subject airplane under the theories of *respondeat superior* and agency.
- 69. Defendant Green Assets is vicariously liable, by operation of law, for Mr. Rawls' acts or omissions in the following respects:
 - a. Mr. Rawls failed to fly the subject aircraft safely;

- b. Mr. Rawls failed to maintain control over the subject aircraft;
- c. Mr. Rawls improperly flew into IFR conditions;
- d. Mr. Rawls failed to properly avoid restricted airspace, leading to an erratic and irregular flight path;
- e. Mr. Rawls failed to maintain adequate communication with air traffic control;
- f. Mr. Rawls failed to conduct a proper weight and balance evaluation prior to take off;
- g. Mr. Rawls' negligent piloting led to his subsequent spatial disorientation; and
- h. Mr. Rawls failed to properly and safely operate the aircraft, resulting in a crash.
- 70. Defendant Green Asset's negligent breach of its duty to Plaintiff's decedent, by and through its employee or agent, caused the fatal injuries and resulting damages complained of herein.
- 71. Plaintiff's deceased, Noah Lee Styron, was killed as a direct and proximate cause of the negligent conduct of Defendant Green Assets by and through its employee agent, Mr. Ernest "Teen" Durwood Rawls.

DAMAGES

Plaintiff re-alleges and re-incorporates the allegations in paragraphs 1-71.

72. As a direct and proximate result of the above-described negligence, and the ensuing injury and death of Noah Lee Styron, his next of kin have been deprived of society, companionship, comfort, guidance, kindly offices, and advice and other damages for which Plaintiff is entitled to compensatory damages.

- 73. This action is brought pursuant to N.C.G.S. § 28A-18-2, and other applicable North Carolina laws in effect on the date of the death of Noah Lee Styron.
- 74. Plaintiff, in her fiduciary capacity as Administratrix of the Estates of Noah Lee Styron, seeks to recover all compensatory and other damages resulting from the wrongful death of Noah Lee Styron, including but not limited to the following:
 - a. Compensation for pain and suffering of the deceased;
 - b. The present monetary value of the decedent to the persons entitled to receive the damages recovered, including, but not limited to, compensation for the loss of the reasonably expected;
 - (i) Net income of the deceased,
 - (ii) Services, protection, care and assistance of the deceased, whether voluntary or obligatory to the persons entitled to the damages recovered, and
 - (iii) Society, companionship, comfort, guidance, kindly offices and advise of the decedent to the persons entitled to the damages recovered.
 - c. Medical, funeral and other expenses; incident to and resulting from the injuries to and the death of the decedent; and
 - d. Such punitive damages as the decedent could have recovered pursuant to Chapter 1D of the General Statutes of North Carolina had the decedent survived, and punitive damages for wrongfully causing the death of the decedent through malice or willful or wanton conduct, as defined by North Carolina law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays this Honorable Court for the following relief:

- That Plaintiff Amber Styron have and recover from the Defendants, jointly 1. and severally, damages in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), plus interest thereon as allowed by law, for the wrongful death of Noah Lee Styron;
- 2. That the cost of this action be taxed against the Defendants;
- For such other and further relief to which Plaintiffs may be entitled and 3. which this Court deems just and proper; and
- Plaintiff demands a jury trial in this matter. 4.

Respec	etfully	submitted this	day	of Ma	y, 2022

GARY C. ROBB (Pending Pro Hac Vice) ANITA PORTE ROBB (Pending Pro Hac Vice) ANDREW C. ROBB (Pending Pro Hac Vice) BRITTANY S. ROBB (Pending Pro Hac Vice)

ROBB & ROBB LLC

One Kansas City Place, Suite 3900 1200 Main Street Kansas City, Missouri 64105

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J. WILLIAM OWEN MUSSELWHITE, MUSSELWHITE

BRANCH & GRANTHAM, P.A. NC Bar No. 47994

606 N. Elm Street

Lumberton, North Carolina 28359

Telephone: (910) 738-5277 Facsimile: (910) 738-3678

wowen@mmbglaw.com

ATTORNEYS FOR PLAINTIFF

EXHIBIT A



Department of State / Division of Corporations / Search Records / Search by Entity Name /

Detail by Entity Name

Foreign Limited Liability Company

EDP MANAGEMENT GROUP, LLC

Filing Information

Document Number

M20000011559

FEI/EIN Number

85-3996390

Date Filed

12/14/2020

State

DE

Status

ACTIVE

Principal Address

7655 MARKET ST, SUITE B WILMINGTON, NC 28411

Changed: 01/21/2021

Mailing Address

7655 MARKET ST, SUITE B WILMINGTON, NC 28411

Changed: 01/21/2021

Registered Agent Name & Address

CORPORATION SERVICE COMPANY 1201 HAYS STREET TALLAHASSEE, FL 32301-2525

Authorized Person(s) Detail

Name & Address

Title Authorized Representative

PARKS, Douglas H. 7655 MARKET ST, SUITE B WILMINGTON, NC 28411

Title Authorized Representative

FLOYD, LYNN 7655 MARKET ST, SUITE B WILMINGTON, NC 28411

Title Manager

DHP Investments, LLC 7655 MARKET ST, SUITE B WILMINGTON, NC 28411

Annual Reports

Report Year	Filed Date
2021	01/21/2021
2022	04/15/2022

Document Images

04/15/2022 ANNUAL REPORT	View image in PDF format
01/21/2021 ANNUAL REPORT	View image in PDF format
12/14/2020 Foreign Limited	View image in PDF format

Florida Department of Clate, Drivin in of Corporations

2022 FOREIGN LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# M20000011559

Entity Name: EDP MANAGEMENT GROUP, LLC

Current Principal Place of Business:

7655 MARKET ST, SUITE B WILMINGTON, NC 28411

Current Mailing Address:

7655 MARKET ST, SUITE B WILMINGTON, NC 28411 US

FEI Number: 85-3996390

Certificate of Status Desired: No

FILED Apr 15, 2022

Secretary of State

3508628393CC

Name and Address of Current Registered Agent:

CORPORATION SERVICE COMPANY 1201 HAYS STREET TALLAHASSEE, FL 32301-2525 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail:

Title AUTHORIZED REPRESENTATIVE

Title

AUTHORIZED REPRESENTATIVE

Name PAF

PARKS, DOUGLAS H.

Name

FLOYD, LYNN

Address

7655 MARKET ST, SUITE B

Address

7655 MARKET ST, SUITE B

City-State-Zip:

WILMINGTON NC 28411

City-State-Zip:

WILMINGTON NC 28411

Title

MANAGER

Name

DHP INVESTMENTS, LLC

Address

7655 MARKET ST, SUITE B

City-State-Zip:

WILMINGTON NC 28411

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: FLOYD, LYNN

OFFICE MGR

04/15/2022

@Green Assets

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Q

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Get In Touch With Us

Contact us to join our Mailing List or to receive more details on Carbon Offset Development.

Green Assets, Inc.

Wilmington

7655 Market St. – Suite B Wilmington, NC 28411 1-855-331-TREE (8733)

Morgantown

48 Donley St. Suite 701 Morgantown, WV 26501

Website URL

www.green-assets.com



Name (required)

Phone

E-mail (required)

Comments or questions are welcome.

SEND MESSAGE

■GreenAssets'

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■GreenAssets

CONTACT INFO

Wilmington

We design and implement carbon offset projects and other conservation initiatives that meaningfully address today's environmental challenges.

7655 Market St. - Suite B Wilmington, NC 28411 1-855-331-TREE (8733)

Morgantown 48 Donley St. Suite 701 Morgantown, WV 2650 I

www.green-assets.com

OUR SERVICES

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Forest Carbon Offset Development
Forest & Soil Stratification Analysis
Conservation Easements
GIS Analysis & Mapping Services
Habitat Restoration & Biodiversity
Consultation

Name *

Phone

E-mail *

Sustainable Forest Management Planning & Certification

Comments or questions are welcome.

SENO MESSAGE

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@Green Assets

HOME SERVICES ABOUT

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0

Department of State: Division of Corporations

Allowable Characters

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:

4201849

Incorporation Date / Formation Date:

11/20/2020 (mm/dd/yyyy)

Entity Name:

EDP MANAGEMENT GROUP, LLC

Entity Kind:

Limited Liability

Entity Type: General

Residency:

Company **Domestic**

State: **DELAWARE**

REGISTERED AGENT INFORMATION

Name:

CORPORATION SERVICE COMPANY

Address:

251 LITTLE FALLS DRIVE

County: New Castle

City: State:

DE

Postal Code: 19808

Phone:

302-636-5401

WILMINGTON

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like O Status

Status, Tax & History Information

Submit

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New Entity Search

For help on a particular field click on the Field Tag to take you to the help area.

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EXHIBIT B



Allison D Dillon

BUSINESS CORPORATION ANNUAL REPORT

ECRETARY OF STATE ID NUMBER:	0250172	STATE OF FORMATION:	NC	Filing Office Use Only
REPORT FOR THE FISCAL YEAR EN	D: 12/31/2021	AMENDING DOC ID		E - Filed Annual Repo 0250172 CA202207406353 3/15/2022 02:45
ECTION A: <u>REGISTERED AGENT'S I</u>	NFORMATION			X Changes
1. NAME OF REGISTERED AGEN	T: DILLON, STUA	RT D		
2. SIGNATURE OF THE NEW REC	GISTERED AGENT:	SIGNATURE CONSTITUTE	ES CONSENT TO THE APF	OINTMENT
3. REGISTERED AGENT OFFICE	STREET ADDRESS & C	OUNTY 4. REGISTERED	AGENT OFFICE MA	ILING ADDRESS
1105 N. Memorial Drive 1105 N. Memorial Drive			norial Drive	
Greenville, NC 27834-140	4 Pitt County	Greenville, N	NC 27834-1404	
4. PRINCIPAL OFFICE STREET AI	<u>, , , , , , , , , , , , , , , , , , , </u>	5. PRINCIPAL O	5. PRINCIPAL OFFICE MAILING ADDRESS	
2. PRINCIPAL OFFICE PHONE NU	JMBER: <u>(252)</u> 757-1	3. PRINCIPAL C	OFFICE EMAIL: Priv	acy Redaction
4. PRINCIPAL OFFICE STREET AI	DDRESS			RESS
1105 N Memorial Dr		1105 N Mem		
Greenville, NC 27834-1404		Greenville, N	C 27834-1404	
6. Select one of the following in	f applicable. (Optiona eran-owned small bus	•		
The company is a ser		owned small business		
The company is a ser	al officers in Section E.)		NAME:	
The company is a ser	al officers in Section E.) NAME: Allise	owned small business on D Dillon retary	NAME: TITLE:	
The company is a ser ECTION C: OFFICERS (Enter addition NAME: Stuart D Dillion	al officers in Section E.) NAME: Allise	on D Dillon		
The company is a ser ECTION C: OFFICERS (Enter addition NAME: Stuart D Dillion TITLE: President	al officers in Section E.) NAME: Alliso TITLE: Secr	on D Dillon retary	TITLE:	
The company is a ser ECTION C: OFFICERS (Enter addition NAME: Stuart D Dillion TITLE: President ADDRESS:	al officers in Section E.) NAME: Alliso TITLE: Secr ADDRESS:	on D Dillon retary lia Drive	TITLE:	
The company is a ser ECTION C: OFFICERS (Enter addition NAME: Stuart D Dillion TITLE: President ADDRESS: 157 Magnolia Drive	al officers in Section E.) NAME: Alliso TITLE: Sect ADDRESS: 157 Magno Winterville,	on D Dillon retary lia Drive NC 28590	TITLE: ADDRESS:	on/business

Print or Type Name of Officer

Secretary

Print or Type Title of Officer

EXHIBIT C



Bailey Evans

BUSINESS CORPORATION ANNUAL REPORT

NAME OF BUSINESS CORPORATION:	Green Assets, Inc.		
ECRETARY OF STATE ID NUMBER: 11538 REPORT FOR THE FISCAL YEAR END: 12 ECTION A: REGISTERED AGENT'S INFOR	832 STATE 2/31/2021	OF FORMATION: <u>DE</u>	Filing Office Use Only E - Filed Annual Report 1153832 CA202212303971 5/3/2022 03:30
1. NAME OF REGISTERED AGENT: E			Changes
2. SIGNATURE OF THE NEW REGISTER	RED AGENT:	NATURE CONSTITUTES CONSENT TO THE	APPOINTMENT
3. REGISTERED AGENT OFFICE STREET ADDRESS & COUNTY		4. REGISTERED AGENT OFFICE MAILING ADDRESS	
7655 Market St.		7655 Market St.	
Wilmington, NC 28411-9458 No	ew Hanover County	Wilmington, NC 28411-94	58
4. PRINCIPAL OFFICE STREET ADDRES	ss	5. PRINCIPAL OFFICE MAILING ADDRESS	
2. PRINCIPAL OFFICE PHONE NUMBE	R : (910) 431-5338 x	3. PRINCIPAL OFFICE EMAIL:	Privacy Redaction
4. PRINCIPAL OFFICE STREET ADDRE	SS	5. PRINCIPAL OFFICE MAILING ADDRESS	
7655 Market St.		7655 Market St.	
Wilmington, NC 28411-9458		Wilmington, NC 28411-945	8
6. Select one of the following if app	licable. (Optional see in	nstructions)	
The company is a veteran- The company is a service-of the company is a veteran-	disabled veteran-owned	small business	
The company is a service-of	disabled veteran-owned	small business NAME:	
The company is a service-of	disabled veteran-owned		
The company is a service-of th	disabled veteran-owned cers in Section E.) NAME:	NAME:	
The company is a service-of th	disabled veteran-owned cers in Section E.) NAME: TITLE:	NAME:	
The company is a service-of ECTION C: OFFICERS (Enter additional officential NAME: Bailey Evans TITLE: Chief Executive Officer ADDRESS:	disabled veteran-owned cers in Section E.) NAME: TITLE:	NAME:	

This Annual Report has been filed electronically.

MAIL TO: Secretary of State, Business Registration Division, Post Office Box 29525, Raleigh, NC 27626-0525

Print or Type Name of Officer

Chief Executive Officer

Print or Type Title of Officer