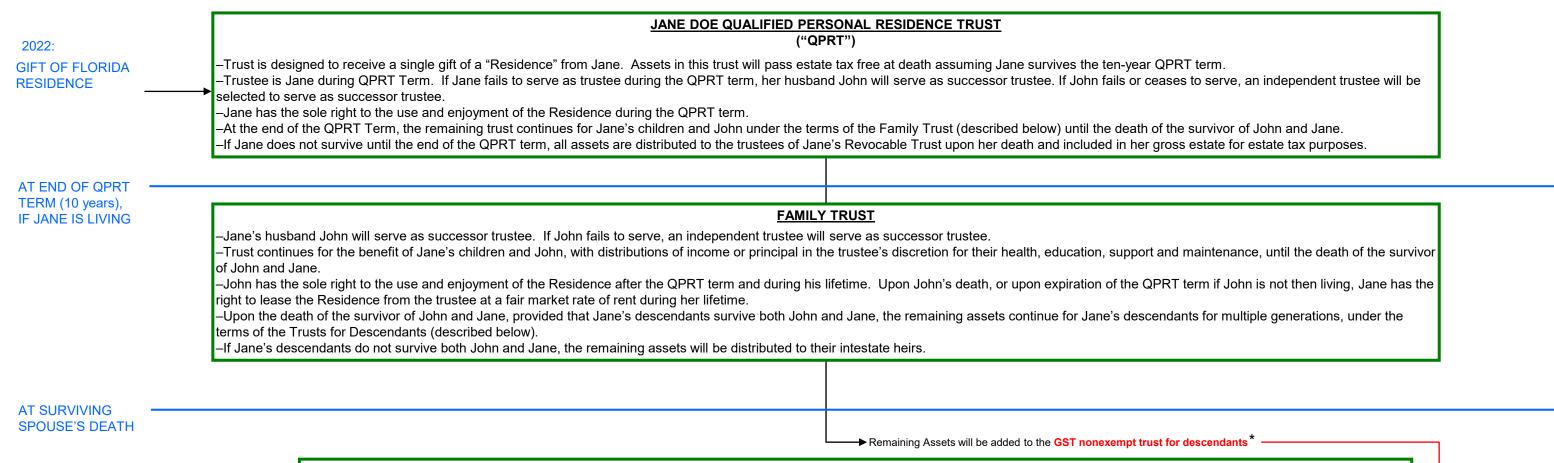
Jane Doe Qualified Personal Residence Trust 2022



TRUSTS FOR DESCENDANTS (GST EXEMPT)

-Assets sheltered by Jane's own GST exemption at her death will be held for her children under the GST Exempt portion of this trust.

-GST exempt portion is <u>not</u> subject to estate tax and <u>not</u> subject to the general power to appoint to the creditors of the descendant's estate at each descendant's death; otherwise identical terms as the GST nonexempt portion.

TRUSTS FOR DESCENDANTS (GST NONEXEMPT)

-All remaining assets at the death of the survivor of John and Jane will be GST nonexempt and will be held for Jane's children in the GST nonexempt portion of this trust.

-Jane's children will serve as sole trustee of their separate trusts and may remove and appoint an independent trustee or co-trustee, if desirable. Other descendants may become co-trustee of their respective trust with the successor trustees named above at age 35 and may become sole trustee at age 40 with the ability to appoint a successor independent trustee.

-Income and principal from each beneficiary's share may be distributed to such beneficiary in the trustee's discretion for the beneficiary's health, education, support and maintenance.

-Upon a beneficiary's death, subject to his or her special power to appoint assets to Jane's other descendants, his or her trust is divided into shares for his or her children and held in further trust for multiple generations under the terms of the Trusts for Descendants.

-All assets will be subject to estate tax at Jane's children's death. Any portion *not* covered by Jane's children's own GST exemption will also be taxed in the estates of their future children. The balance will be held for their children under the **GST Exempt portion** and will pass to Jane's children's future grandchildren estate tax free.

Estate Tax-Free at both your deaths, and multiple generations of grandchildren and their descendants

^{*} GST exemption can be allocated after the Estate Tax Inclusion Period expires (in this case, the ten-year QPRT term)

[■] Estate Taxable at each descendant's death