We created this trust to facilitate the management of our assets during our lifetimes, to provide a structured method of caring for us if we become incapacitated, and to establish the manner and time in which we want our assets to be distributed to our beneficiaries. In addition, our specific intentions in creating this trust include, but are not limited to the following:

To the extent permitted by law, having the assets of the trust estate excluded for federal estate tax purposes from our gross estate and the gross estates of our trust beneficiaries except to the extent we have explicitly granted a general power of appointment to a trust beneficiary;

To the extent permitted by law to maximize the basis step-up on trust assets in the event of the death of a Trustor or a trust beneficiary (without generating estate tax);

To promote income tax efficiency with respect to trust assets and distributions from the trust; and

The assets in this trust not be subject to the claims of any beneficiary’s creditors.