**Prospect Curator**

This section should present a bulleted list of client types that would be ideal candidates for this strategy, based on the content of the input text.  
The examples below illustrate potential client profiles, but they should not be considered exhaustive. The final list must reflect specific insights extracted from the input document.

* Ultra-High-Net-Worth (UHNW)
* Clients with Liquidity Risk
* Individuals Facing Transfer Tax Exposure
* Real Estate Professionals
* Clients of Advanced Age or Uninsurable Status
* Individuals with Low Exemption
* Private Equity Investors
* Real Estate Developers
* Closely-Held Business Owners
* Any other relevant client types or characteristics identified in the input text as appropriate for this strategy

**Back of the Napkin**

This section will eventually display an AI-generated image that visually represents the strategy. Until then, output the following placeholder text: "Placeholder for AI Generated 'Back of the Napkin' Image"

**The Pitch**

**Paragraph 1 – Strategy Summary (Elevator Pitch):**

* Begin with a clear, concise definition of the strategy.
* Treat this paragraph as an executive summary or elevator pitch.
* Describe *who* is involved and *how* funds flow between the parties, or what process is involved.
* The tone should be compelling, direct, and easily understandable.
* The goal is to quickly capture the reader's attention with a high-level view of the strategy.

**Paragraph 2 – Key Elements or Structure Details:**

* Build upon the first paragraph without repeating it.
* Describe the second or third parts of the structure, or highlight key relationships, elements, or expected outcomes.
* Keep the explanation moderately detailed—avoid overwhelming the reader.
* Full technical details should be reserved for Page 2.
* Ensure that the overall purpose and mechanics of the strategy are evident.

**Paragraph 3 – Single Sentence Value Proposition:**

* Must be **exactly one sentence**.
* Should deliver a powerful, concise value proposition.
* Do **not** use semicolons, conjunctions, or compound sentences.
* This sentence should stand alone as a bold, final takeaway.

**Rewards**

This section should display a bulleted list of the types of rewards that may result from this strategy, based on the information provided in the input text.

The examples below represent potential rewards from a different subject area and are included only to guide formatting and structure. **Do not use these examples unless they are directly relevant to the content of the input document.**

* Legacy Asset Preservation
* Creditor Protection
* Tax Savings
* Strategic Wealth Transfer
* Tax Minimization
* Optimization for Next Generation
* Any other relevant rewards identified in the input document as potential benefits of this strategy

**Client Needs**

This section should describe the client’s situation, including their current reality, competing interests, practical concerns, and both present and future risks.

It should also convey the significance or gravity of these facts to clearly demonstrate the client's needs.

There is space for only four lines, use three to four compelling sentences to make the needs clear and immediate.

**The Elixir**

Without repeating content from the other sections - ‘The Pitch,’ ‘Rewards,’ or ‘Client Needs’ - this paragraph should serve as a bridge from ‘Client Needs’ to the proposed solution.

It should provide an eloquent and concise description of the positive impact or anticipated result of the strategy.

This must be achieved in three to four clear, convincing sentences that make the client’s needs, the solution, and the strategic point unmistakably clear.

**Insurance+**

This paragraph should identify and briefly describe the type(s) of insurance product(s) that support or enhance the effectiveness of the proposed solution.

Rather than listing general product benefits, focus on explaining why specific categories or types of insurance are particularly suitable and appropriate for this strategy.

Some explanation and detail are welcome, but the main purpose is to clearly connect the solution to the role of insurance in amplifying its impact.

**Landmines**

Every strategy includes legal boundaries, inherent risks, and potential vulnerabilities. Case studies often reveal critical mistakes and “bad facts” that should be avoided during both the planning and execution phases.  
This section should present a bulleted list of **landmines** the client must avoid.

- Landmine 1

- Landmine 2

- Landmine 3  
(*Add up to 7 total, based on relevant findings in the input text*)

You must list a **minimum of 3** and a **maximum of 7** landmines, depending on how many are identified in the input text.

The examples below are from unrelated cases and are provided only as reference to guide the format and level of detail. **Do not use these examples unless they are directly relevant to the input text.**

* **Tax Avoidance Purposes** - The IRS scrutinizes transactions lacking economic substance or structured purely for tax benefits. The I-SDA must be motivated by legitimate business or legacy planning goals.
* **Retained Powers** - To prevent estate tax inclusion, a senior family member must not retain unilateral control over the I-SDA. An independent ILIT trustee or investment director must act solely in the interest of ILIT beneficiaries.
* **Unrealistic Valuation Discounts** - Courts reject unsupported valuation discounts applied to I-SDA receivables that are not aligned with market standards.

**Path to Close**

**Head Start on Diligence**  
The following information and samples will sustain momentum toward closing:

* **Proof of Concept** - Review a case study. Share it with the client.
* **Client Letter re: Next Steps** - Summarize the value proposition and gather info to proceed.
* **Balance Sheet** - Complete the form. Identify legacy assets to be preserved.
* **Cash Flow Analysis** - Does the financial model show premiums can be paid from excess cash flow (i.e., cash not needed for living expenses, gifts, capital calls, and taxes)?
* **Transfer Tax Exposure** - How much estate tax would be owed today, at life expectancy?
* **Educate Centers of Influence** - Follow the Levine case. Do not be the next Morrissette or Cahill.

**What Will Clients Ask?**

This section should present a list of client questions and answers, drawn directly from the insights in the input text. Follow the structure and tone below precisely.

Q. Insert a simple but important client question here.

A. The first question should be answered in two lines. It should not be a simple yes/no question, but instead should reflect a meaningful concern, with a response that provides clarity and insight.

Q. An important question that deserves a longer answer should be placed here.

A. This question should address a higher-level issue - something strategic, big-picture, or focused on a controllable factor that impacts outcomes. The answer should be thoughtful and grounded in risk/reward, maximizing utility, and tangible or intangible value creation.

Use this space to briefly compare pros and cons or add perspective, then tie the explanation back to the client’s goals and situation in the final sentence or two.

The following are only formatting examples and must not be used unless they are directly relevant to the input document:

Q. How much value can the strategy create?

A. Though facts differ in each case, the Tax Court upheld a $2.1 million estate tax valuation on a $6.5 million Gen-Skip receivable for a $17+ million face policy - a tax-free wealth transfer of $15+ million.

Q. What are the risks? What are the keys to success?

A. The strategy must be motivated by non-tax purposes, for example, the desire to increase liquidity and preserve illiquid family legacy assets for future generations. The Gen-Skip ILIT must have a truly independent trustee, and the client cannot retain any rights in the ILIT or the power to terminate the SDA either alone or with the consent of another. Premiums paid must not be needed to support the lifestyle of the client. The ILIT should be signed and seeded before the insurance application is created, and the ILIT trustee should be the applicant from the outset.

**Sustain Success**

**Stay in Contact**  
Every strategy has best practices, along with periodic administrative and maintenance requirements. Filings, notices, reviews, and reports matter. Set reminders. Check in and follow up. Build trust.

Now provide a **bulleted list** of relevant ongoing actions or administrative responsibilities based on the content of the input text.

The list must reflect actual needs from the input document and may include items such as scheduled filings, notice delivery, periodic audits, and client reviews.

* *Bullet item 1 based on text findings*
* *Bullet item 2 based on text findings*
* *(Continue with 3-7 total bullets as appropriate to the case)*

Below are example items from other subject areas meant to **inspire formatting only**. Do **not use these unless they are explicitly relevant** to the input document:

* **Withdrawal Notices and Gift Tax Returns** - Record Crummey Notices. File annual Gift Tax Returns.
* **Policy Audit** — Schedule annual update discussions with the client. Is the life insurance product performing as initially illustrated? If so, great! If not, are any changes appropriate?

**Look Ahead**

**Look Ahead**  
What is on the horizon, what is next? Are there other strategies the client might consider? What are others saying about this topic? What are the new questions, opportunities, and forward-looking views?

Then provide a **bulleted list** that addresses:

* Emerging developments or anticipated changes in law, policy, or market conditions
* Additional strategies that may be relevant based on the input document
* What peers, experts, or commentators are currently saying or doing in this space
* New questions or topics the client should expect to encounter
* Opportunities for deeper discussion, training, or further exploration - **include links where available**
* *Bullet item 1 informed by the input text*
* *Bullet item 2 informed by the input text*
* *(Continue as needed with 3–6 forward-looking insights)*

Below are sample items **only for inspiration**, and should not be used unless they align with the actual content of the input text:

* **Look out for new I-SDA cases to pivot proactively**
* **Hold regular recurring sessions (at least annually) with client and lawyer to actively manage the plan**
* **Ensure life insurance is maintained in proper amounts as the private holdings appreciate in value**