

ADVANTAGES (CONTINUED)

DISADVANTAGES (Continued)

The Foundation within the Trust is controlled completely by the Trustees to strengthen the purpose of the Trust to take advantage of Not-For-Profit procedures to qualify for tax exemption.

The Trust Foundation may receive any properties or benefits in any amounts at any time without tax consequences from another Not-For-Profit qualified tax exempt Foundation. Gifts or endowments received by the Trust Foundation are not considered income under the Internal Revenue Code.

The Trust through the Trust Foundation may receive and retain disbursements of accumulated income from a State Chartered Private Foundation and yet remain legally independent and separate from this State Chartered Foundation. While State Chartered Foundations may be subject to change, the Trust is not so affected and may operate regardless of changes in N-F-P corporate proceedings.

A Trust is in a position to take advantage of favorable changes in N-F-P practices through the use of a multiple Foundation system.

On a \$10,000,000 estate, a Trust can save \$6,886,200. In the State of Illinois, the Attorney General estimated on an estate of \$1,000,000, for state taxes alone, an estate would pay \$106,296.00. Estimates of Federal taxation on \$1,000,000 estate could amount to as much as \$320,000 or more - a Trust would save all of this.