THE BLY LAW FIRM

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To Whom It May Concern:

It has been brought to the attention of this firm that it is the opinion of certain banks and others that the trust package produced and distributed by Trusts Unlimited is a business trust or as they are sometimes known *Massachusetts Business Trusts*. Presumably, this is because the beneficiary designations are evidenced by Certificates of Interests which also happens to be utilized by Massachusetts Business Trusts.

Upon complete review of the trust documents, this is not a correct assumption. First, interests of business trusts are freely transferable or *alienable*. A close reading of the master trust document not only does not provide for this, but alienation is expressly forbidden. Second, a business trust because it functions like a corporation is taxable at corporate tax rates. In this trust package, the master document provides that *all* income of the trust is required to be distributed to the beneficiaries and there is a provision in that document that specifically states that the trust is a pass-through entity for purposes of taxation. Simply put, the beneficiaries are liable for whatever income tax is due at individual tax rates. Since the trust is required to distribute all income, the trust does not incur taxes, either at the corporate or trust tax rate.

The trust package is simply a self-settled asset protection trust formed under the laws of the state of Wyoming, with various sub-trusts designed to hold different types of property the Settlor/grantors choose to place within them and nothing more. It is not designed to evade or ignore income taxes, nor any other illegal purpose. It is hoped that this corrects any confusion which has been caused.

For the firm:

Robert M. Bly