FIRM RESUME

SJBT is a boutique law firm of attorneys wholly dedicated to providing sophisticated estate planning advice to our clients. SJBT attorneys are leaders in the field of international tax, estate, and asset protection planning. We are sought after by wealth management advisors, CPAs, family office managers, and other professionals for guidance on the complex legal, tax, and compliance issues faced by multi-jurisdictional and high net worth clients. In addition to this niche practice, our attorneys possess a broad range of experience in traditional tax, estate, and business planning, as well as trust and estate administration and probate. We provide significant value in our representations, with decades of experience in each of our practice areas and by maintaining and cultivating close relationships with professionals in almost 30 foreign jurisdictions as well as in nearly every state in the U.S.

We take pride in proactively and conscientiously pursuing our clients' goals within the strictest boundaries of the legal profession. In doing so, we recognize that our representation often involves deeply personal issues that require a tremendous measure of personal respect and we strive to always communicate in a way that brings honor to those relationships that our clients place in our care. As a firm, we are committed to adhering to the highest standards of honesty and integrity, always putting our clients' needs first.

Clients

The core clientele of the firm is high net worth individuals. Many of the firm's domestic estate planning clients reside in Texas, although the majority of the firm's international estate planning clients reside outside of Texas, throughout the United States, and abroad. The firm also advises certain financial service providers on matters related to U.S. tax, asset protection, life insurance, and estate planning issues, as well as counsels various charitable organizations, both public and private, on a wide variety of matters.

Attorneys

The firm was founded in April 2009 by a group of four attorneys who had practiced together for many years at another estate planning firm. The firm currently consists of five attorneys, each possessing the highest academic credentials and ability to render client service consistent with the firm's standards of excellence. The firm's attorneys actively participate in the development of their practice areas as writers and speakers; they also are regularly asked to consult with major financial institutions, accounting firms, and other professional organizations on matters related to their areas of expertise.

Qualifications

The firm is AV rated in all of its practice areas. In addition, all of the firm's senior attorneys are board certified by the Texas Board of Legal Specialization in their practice areas. Schurig, Jetel, Beckett & Tackett is listed in the Martindale Hubbell Bar Register of Preeminent Lawyers under Asset Protection, Tax Law, Trusts and Estates, Wills and Probate.

Practice Areas and Specialties

International Estate and Asset Protection Planning. Given the current economic, legal, and sociopolitical environment, SJBT believes that estate planning attorneys have a duty to advise all clients on the necessity of, and the techniques for achieving, asset protection. Thus, the attorneys at SJBT have extensive knowledge of, and practical experience implementing, the various techniques available to preserve individual wealth from threats such as divorce, litigation, future creditors, and investment risk. These techniques include the optimization of state and federal exemptions for assets, such as homestead, retirement plans, annuities and life insurance, marital property planning, the use of *inter vivos* marital, dynasty, and children's trusts, and tax and entity planning. In addition, SJBT is one of the leading firms in providing advice regarding wealth preservation and risk management through the implementation of foreign trust and related business, investment, and life insurance structures, and assisting clients with the tax planning and compliance aspects of such structures. The firm's four-volume treatise, *Asset Protection: Domestic and International Law and Tactics*, first published by Thomson/West Group in 1995 and updated quarterly, remains the foremost treatise in the area of asset protection. The attorneys at SJBT maintain strong relationships with fiduciaries, money managers, and attorneys in more than eleven foreign jurisdictions, and ensure the continued integrity of international planning by conforming to strict due diligence and "know your client" policies. In the area of "out bound" international estate planning, SJBT attorneys are experienced in assisting U.S. clients with settling offshore trusts and forming various foreign entities that provide clients with a comfortable balance of control and protection of assets, allowing clients to manage their family's wealth risk and accumulate assets for future generations. With respect to "inbound" international estate planning, attorneys at SJBT assist U.S. taxpayers and non-U.S. trustees with managing the complex U.S. tax aspects of foreign non-grantor trusts, and provide advice on the multi-jurisdictional tax and treaty issues applicable to international private clients. In this regard, SJBT attorneys have formulated estate and business plans for individuals and families with ties to Australia, the Bahamas, Canada, the Channel Islands of Jersey and Guernsey, China, Costa Rica, the Czech Republic, Dubai, France, Germany, India, the Isle of Man, Israel, Italy, Liechtenstein, Mexico, Nepal, the Netherlands, New Zealand, Oman, Panama, Portugal, Spain, Switzerland, and the United Kingdom.

Domestic Estate Planning. The design and implementation of estate and wealth-transfer plans is an essential component of the firm's practice. In addition to comprehensive wills and management trust vehicles crafted to meet client's goals regarding the testamentary disposition of property and minimize the exposure of assets to estate, gift, income, and generation-skipping transfer taxes at death, the attorneys at SJBT employ various tools, such as revocable and irrevocable trusts, life insurance trusts, grantor trusts, qualified personal residence trusts, generation-skipping trusts, and beneficiary designation planning for IRAs, qualified plans, and other employee benefit plans in order to maximize the value of assets that can be transferred to successive generations. An integrated estate plan also involves tax and entity planning and charitable planning, and in some cases, offshore life insurance planning and international estate planning is appropriate. SJBT provides expertise in all of these areas.

SJBT also provides clients with the peace of mind that comes from proper disability planning. Because the average life expectancy is longer, more of us can expect to spend some part of our lives unable to manage our own affairs. Therefore, no estate plan is complete without disability planning. The attorneys at SJBT regularly prepare financial and medical powers of attorney and other related documents that allow for the smooth and low-cost management of a client's affairs in the event of a disability.

Probate, Trust, and Estate Administration. The firm's probate, trust, and estate administration practice encompasses all aspects of administration of decedents' and fiduciary estates. The firm's probate practice involves submitting wills to the court for probate or assisting the decedent's family with alternative heirship proceedings when the decedent died without a will. Once the will is probated, or heirs are determined, SJBT attorneys assist the family with administrative matters such as gathering, inventorying, and valuing assets in the estate, and preparing federal estate tax returns, state death tax returns, and state and federal gift or generation-skipping transfer tax returns. For clients who have just lost a loved one, estate administration can be a daunting task. The attorneys at SJBT provide thoughtful, competent assistance in meeting court filing deadlines and federal tax filing deadlines, thereby making a difficult time much easier to endure. The firm's trust and estate administration practice involves advising fiduciaries on the legal and practical aspects of the administration of trusts, decedent's estates, and the estates of minors and incapacitated persons. SJBT attorneys also represent beneficiaries of estates in negotiating settlements of estates, protecting beneficiaries' rights with regard to monitoring costs of administration, and advising in contested matters.

Tax and Entity Planning. A complete understanding of tax and entity issues is essential to an effective estate planning practice, both international and domestic. The attorneys at SJBT understand the intricacies and nuances of state and federal income tax, estate and gift tax, state franchise tax, and the various charitable tax regimes, and work with clients to define their goals, and to design and implement creative strategies to achieve those goals, while at the same time working toward the optimum tax results. The attorneys at SJBT strive to use their understanding of tax issues to meet each client's individual needs within the context of all relevant taxing statutes. SJBT attorneys specialize in each facet of tax law, allowing the firm to address the tax implications that arise from each individual or business transaction.

The attorneys at SJBT are also experienced in both the federal and international tax aspects of using alternative structures for the ownership of business and investment property, as well as in the formation and taxation of pass-through entities, such as trusts and family limited partnerships. When helping a client choose the proper entity through which to conduct their business or hold investments, we tailor the entity to the client by considering such factors as (1) the client's personal preferences, (2) the level of control the client wishes to maintain over the business operation, (3) the degree of liability protection needed by the client, (4) the desired federal income tax treatment (e.g., separate corporate taxation, flow-through tax treatment, or disregarded entity treatment), (5) the preferred entity form based on the type of business or investment operations, and (6) the appropriate state law jurisdiction (e.g., Texas or Delaware). By taking into account each of these factors, SJBT can structure the entity form—whether it is a corporation, a limited partnership, an LLC, or an LLP—to fit each client's individual situation. After helping the client implement a business entity, we continue to educate and assist the client in the proper administration of the entity, and to facilitate business succession planning to ensure the longevity of the business.

A significant aspect of SJBT's tax practice involves the representation of clients with tax controversies pending before the Internal Revenue Service and state tax agencies. SJBT frequently deals with IRS examining agents and appeals officers in audits and administrative hearings. The firm's attorneys are intimately familiar with tax filing requirements, and are experienced in the preparation, examination, and appeal of various federal and state tax and information returns.

International Residency and Citizenship Planning. In the new global environment, international business, personal mobility, and technological interconnectivity have created lives that transcend borders—particularly for the high net worth individual. It is therefore understandable that every year, thousands of Americans decide to move their place of residence to a foreign country, or even to obtain a foreign citizenship. Depending on the jurisdiction, having a wide-ranging portfolio of passports, legal citizenships, and residencies can enhance tax planning, international travel, personal safety, and disaster planning. SJBT is well-versed in the most advantageous jurisdictions for foreign residency and citizenship, as well as the various means of obtaining legal status abroad. Our network of global contacts with immigration attorneys and financial planners in over 30 countries assists us in tailor-making each residency or citizenship solution to the client's unique needs and objectives. Services can include immigration applications and advocacy, qualitative research regarding jurisdictions, expatriation law, tax planning in light of multiple or foreign citizenships, facilitation of economic citizenship applications, real estate consulting and acquisition, international networking, and travel advising.

SJBT believes that a person's citizenship is one of their most precious commodities, and will never advocate a citizenship or residency program that puts our clients at risk. As a result, SJBT only deals in government programs that are well-proven and ethical, avoiding "shortcuts" to citizenship that are often confidence scams or the product of systemic corruption. Also, SJBT advises its international clients with regard to their personal safety, evaluating the geopolitical security factors that play a key role in choosing a particular jurisdiction for residency or expatriation and recommending them to contacts in the personal security community. Even after a client settles in a foreign jurisdiction, SJBT continues to monitor open-source intelligence and assess security factors in order to warn the client of possible risks.

Charitable Planning and Administration. Charitable planning can play an integral role in a client's overall estate plan. Whether a client is motivated by potential tax savings, or has purely philanthropic goals, SJBT attorneys utilize a number of tools to help clients make charitable gifts, such as charitable lead or remainder trusts, testamentary charitable trusts, private foundations, private operating foundations, supporting organizations, and dedicated funds at community foundations. SJBT attorneys not only help clients determine which tool will best meet a client's objectives, but they also assist the client with the documents and forms necessary to create and implement the new trust or non-profit corporation and, where necessary, prepare and file the required forms with the Internal Revenue Service and governing state to have the new entity recognized as being tax exempt.

SJBT attorneys also assist the firm's clients with the administration of existing and newly created structures. This includes assistance not only with the preparation and filing of applicable federal and state tax returns, but also with the annual or more periodic trust and corporate documentation necessary to maintain proper books and records under state and federal law. The firm's attorneys also assist clients with identifying and selecting permissible public charities to whom charitable grants might be made, as well as the paperwork required to properly select and document such grants. SJBT attorneys have also had extensive experience in assisting clients with their international charitable grants and giving to charities created outside of the United States.

Complex Structure Administration. Because SJBT approaches client representations in a holistic manner, we understand that the careful administration of complex legal structures is the next logical step following planning and implementation. Accordingly, the firm offers a comprehensive suite of services that assist clients and their other advisors in the administration of international estate planning, private placement life insurance, and business structures. Depending on the level of administrative support that SJBT clients receive from their family offices, accountants, or other legal advisors, SJBT's administrative services can be tailored to encompass virtually all administrative needs or they can be limited to only a few areas. The scope of administrative services includes tax reporting, reporting to local administrative bodies, liaison services with trustees, protectors, asset managers, and custodians, maintenance of corporate or partnership books and records, facilitating contributions to or withdrawals from structures, and general transactional assistance. SJBT has developed proprietary filing and record-keeping systems in all of the areas with respect to which the firm offers administrative support services, and such systems provide clients with ready access to historical data when it is required. In order to ensure optimal cost-effectiveness of these administrative services, the majority of the work is performed by non-lawyer professionals and SJBT charges for administrative services at a reduced hourly rate schedule as compared to its charges for planning and implementation projects.

Strategic Financial Planning Alternatives (Legal and Tax Matters). SJBT approaches the representation of wealthy individuals from a “big picture” perspective, and we believe that means becoming knowledgeable of, and involved in, the client’s overall financial picture, the centerpiece of which is typically a multi-asset class investment portfolio. Whether the portfolio is a mature, well-diversified mix of investment types, a single-stock position situation, or a recently liquidated portfolio consisting of mostly cash, SJBT lawyers have the knowledge and experience to work side by side with the client’s investment advisors to address portfolio-related challenges. Accordingly, we offer legal and tax representation in a very broad range of investment-oriented transactions, including portfolio tax-efficiency planning, such as private placement life insurance and deferred annuities, liquidity and diversification planning techniques, and structural planning for non-US investments. SJBT lawyers have long-standing, senior executive-level relationships with a large and diverse group of US and non-US investment management firms (in both traditional and alternative investment areas), investment consultants, private banks, brokers, and custodians. Our commitment to maintaining and expanding such relationships has allowed us in many cases to leverage them in order to obtain preferential fee and capacity arrangements for SJBT’s client base. Moreover, we demonstrate our dedication to understanding and participating in our clients’ investment portfolio issues through professional alliances with the investment management community, such as Elizabeth Schurig’s tenure as a faculty member of the Investment Management Consultant’s Association (IMCA) Chartered Private Wealth Advisor program, sponsored by a partnership of the University of Chicago Graduate School of Business, and speaking engagements in investment-oriented educational forums.

Mediation. Mediation can play an essential role in successfully resolving disputes involving estates, probates, trusts, marital property, charitable organizations, and estate, gift, and generation-skipping transfer tax issues. When there is a conflict among family members, economic disparity among heirs, mentally or physically challenged children, divorce and multiple marriages, entrepreneurial or closely held business, or any other scenario that lends itself to future litigation, the use of a Qualified Independent Third Party or mediator reduces this probability. The mediation process is designed to achieve successful resolution of highly emotional and contentious conflicts that arise among individuals, distributees, heirs, beneficiaries, fiduciaries, and/or taxpayers in a manner that seeks to avoid or reduce the significant economic and personal costs incurred by the parties to such disputes.

Attorney Curriculum Vitae Summaries

Elizabeth M. Schurig (eschurig@sjbt.com) Ms. Schurig represents a wide array of clients faced with multi-jurisdictional tax, estate, and business planning issues. She is experienced in the design of complex estate and business plans for U.S., non-U.S., and dual-citizen clients, and in assisting such clients with their pre-immigration and expatriation tax planning. Ms. Schurig frequently advises clients on the resolution of international tax and treaty issues in connection with their estate and business planning, and serves as outside counsel to several high net worth family offices. She has formulated and administered estate and business plans for individuals and entities with ties to Australia, the Bahamas, Canada, the Channel Islands of Jersey and Guernsey, China, Costa Rica, the Czech Republic, Dubai, France, Germany, India, the Isle of Man, Israel, Italy, Liechtenstein, Mexico, Nepal, the Netherlands, New Zealand, Oman, Panama, Portugal, Spain, Switzerland, and the United Kingdom. In addition to her expertise in the design, administration, and tax compliance of both inbound and outbound foreign trust and business structures, she has an extensive background in traditional probate, trust, and estate administration. A frequent author and speaker in the areas of domestic and international estate planning, asset protection, and foreign trust planning and tax compliance, Ms. Schurig has been quoted in various publications, including Practical Accountant and Bloomberg Wealth Manager. She is a contributing author (since 1995) and co-editor (since

2000) of the four-volume treatise, *Asset Protection: Domestic and International Law and Tactics* (Thomson/West Group, updated quarterly). Ms. Schurig is Board Certified in Estate Planning and Probate Law (Texas Board of Legal Specialization), is a member of STEP (Society of Trust and Estate Practitioners), was named a Texas Super Lawyer in 2003 through 2009 by *Texas Monthly* and *Law & Politics* magazines, is listed in The Best Lawyers in America, and was named in *Worth* Magazine's Top 100 Attorneys list for 2006, 2007, 2008, and 2009. Ms. Schurig graduated from The University of Texas School of Law in 1988 after receiving her B.A. in English from Baylor University in 1984.

Amy P. Jetel (ajetel@sjbt.com) Ms. Jetel focuses primarily on the design, implementation, and administration of outbound and inbound foreign trust and related business, investment, and life insurance structures, including the tax planning and compliance aspects of such structures. Ms. Jetel also provides essential research and analysis for the resolution of international tax and treaty issues for the firm's clients, and assists in the support of several high net worth family offices. Ms. Jetel practices in the areas of traditional estate and disability planning, probate and estate administration, and entity formation and governance. She has formulated and administered estate and business plans for individuals and entities with ties to Australia, the Bahamas, Canada, the Channel Islands of Jersey and Guernsey, China, Costa Rica, the Czech Republic, Dubai, France, Germany, India, the Isle of Man, Israel, Italy, Liechtenstein, Mexico, Nepal, the Netherlands, New Zealand, Oman, Panama, Portugal, Spain, Switzerland, and the United Kingdom. Ms. Jetel has written various articles on estate planning, asset protection, and international taxation and compliance, and serves as a contributing author of the four-volume treatise, *Asset Protection: Domestic and International Law and Tactics* (Thomson/West Group, updated quarterly). She is a member of STEP (Society of Trust and Estate Planning Practitioners) and was named as a Texas Rising Star in 2005 through 2009 by Texas Monthly and Law & Politics magazines. Ms. Jetel graduated from The University of Texas School of Law in 2002 after receiving her B.A. in English, with honors, from The University of Texas at Austin in 1998 and is a veteran of the U.S. Navy.

Carolyn M. Beckett (cbeckett@sjbt.com) Ms. Beckett specializes in the U.S. and international tax aspects of using alternative structures for the ownership of business and investment property, with particular emphasis on the use of partnerships and other pass-through entities such as trusts and family limited partnerships. Due to Ms. Beckett's extensive background in federal income taxation for both individuals and entities, she brings significant value to the proper analysis of international tax and treaty issues for the firm's multi-jurisdictional clients. She also advises clients concerning the tax considerations involved in the purchase and sale of real estate and the use of like-kind exchanges and other complex arrangements relating to real estate structure and tax issues. Ms. Beckett has experience advising on tax issues for individuals and entities with ties to Australia, the Bahamas, Canada, the Channel Islands of Jersey and Guernsey, China, Costa Rica, the Czech Republic, Dubai, France, Germany, India, the Isle of Man, Israel, Italy, Liechtenstein, Mexico, Nepal, the Netherlands, New Zealand, Oman, Panama, Portugal, Spain, Switzerland, and the United Kingdom. Ms. Beckett is a contributing author of the four-volume treatise, *Asset Protection: Domestic and International Law and Tactics* (Thompson/West Group, updated quarterly) and co-author of Federal Tax Aspects of Cancellation of Indebtedness and Foreclosure, (Shepard's/McGraw-Hill, 1993). She is licensed to practice law in Texas and New York, is Board Certified in Tax Law (Texas Board of Legal Specialization), is licensed as a Certified Public Accountant by the State of Texas, and was named a Texas Super Lawyer in 2004 through 2009 by *Law & Politics* and *Texas Monthly* magazines. Ms. Beckett graduated with honors from The University of Texas School of Law in 1972 after receiving her B.B.A. in Accounting from The University of Texas at Austin in 1969.

Steven J. Tackett (stackett@sjbt.com) Mr. Tackett's practice covers all aspects of estate planning, probate, and transfer tax law, including the design and implementation of traditional and non-traditional estate plans for both U.S. and non-U.S. clients and the probate of wills and the determination of heirship of decedents dying without wills. Mr. Tackett is highly experienced in mediation of probate disputes and in the judicial construction, reformation, modification and termination of trusts and in the administration, settlement, and distribution of estates and trusts. Mr. Tackett represents clients with tax controversies pending before the Internal Revenue Service and assists in the preparation, examination, and appeal of federal estate, gift, and generation-skipping transfer tax returns. Mr. Tackett is Board Certified in Estate Planning and Probate Law (Texas Board of Legal Specialization), a Fellow of the American College of Trust and Estate Planning Counsel (ACTEC), was named a Texas Super Lawyer in 2003 through 2009 by *Law & Politics* and *Texas Monthly* magazines, and is listed in *The Best Lawyers in America.* Mr. Tackett graduated from The University of Texas School of Law in 1971 after receiving his Bachelor of Arts in Government from The University of Texas at Austin in 1968.

Michelle Rosenblatt (mrosenblatt@sjbt.com) Ms. Rosenblatt practices in the areas of domestic and international estate planning, and entity formation and governance. She assists in the design and implementation of both traditional and sophisticated estate plans, including drafting of wills, trusts, disability documents, and partnership and limited liability company agreements. Ms. Rosenblatt graduated from Pepperdine University School of Law in 2005 after receiving her B.A. in psychology from The University of Texas at Austin, with honors, in 1998.

Morgan Barsi (mbarsi@sjbt.com) Mr. Barsi assists in the design, implementation, and administration of foreign trust and related business and investment structures, including taxation and compliance aspects of such structures. Mr. Barsi also assists with traditional estate and disability planning, and facilitates the probate of wills and the preparation of estate and gift tax returns. A graduate of Goizueta Business School at Emory University with a B.B.A. in Finance (with distinction), he also minored in Asian Studies before he went on to receive his J.D. from the University of Texas at Austin.