

**LOUIS S. HARRISON**  
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Employment

Partner, Harrison & Held (formerly, partner, Lord, Bissell & Brook, Chairperson, Trusts and Estates Group)

Education

Colgate University, B.A. in Mathematics, *Magna Cum Laude*.

Duke University School of Law, J.D., with High Honors.

University of Chicago School of Business, M.B.A , with Honors in Finance

Teaching Experience (former)

Adjunct Professor of Tax Law, DePaul University Law School, Estate and Gift Taxation and Fiduciary Income Taxation.

Adjunct Professor of Law, University of Chicago-Kent College of Law, Estate Planning.

Adjunct Professor of Law, Northwestern University School of Law, Estate and Gift Tax Planning.

Editorial Boards

Senior Editor, *Duke-Alaska Law Review* (1983-84).

Contributing Editor, *Tax Companion* (Dearborn Publishing 1990-1996).

Tax and Estate Planning Professional Publications

Co-author, "Recent Developments in Illinois Law," *28th Annual Estate Planning Short Course* (IICLE 1985).

Co-author, "Recent Developments in Illinois Law: Cases, Trends and Statutes," *29th Annual Estate Planning Short Course* (IICLE, 1986).

Co-author, "Recent Developments in Illinois Law: Cases, Trends and Statutes," *30th Annual Estate Planning Short Course* (IICLE, 1987).

Co-author, "Recent Developments in Illinois Law: Cases, Trends and Statutes," *31st Annual Estate Planning Short Course* (IICLE, 1988).

Author, "Planning Techniques After the Tax Reform Act of 1986," *Fiduciary Income Tax Practice* (IICLE, 1989).

Author, "Obtaining 501(c)(3) Status for Economic Development Organizations: A Guide for Attorneys" (Community Economic Development Law Project, 1989).

Author, "Analysis of Recent Statutory and Other Developments and Their Impact on Completing the New Form 706," *Advanced Estate Administration Program* (IICLE, 1989).

Author, "The Viability of Hanging Powers In Trusts After TAM 8901004; and Reducing Estate Taxes By Naming Beneficiaries as Fiduciaries," *Advanced Estate Planning Program* (IICLE, 1989).

Author, "Picking Up the Pieces of Post-Mortem Income Tax Planning: An Examination of Traditional Planning Strategies in Light of the Tax Reform Act of 1986 and Its Aftermath," *Estate and Financial Planning Reporter* (Commerce Clearing House, 1989).

Author, "Lapse of Crummey Power Need Not Result in Taxable Gift if Hanging Power is Used," *17 Estate Planning* 140 (Warren, Gorham & Lamont Inc., May/June 1990).

Author, "Issues Likely to Confront the Preparer of an Estate Income Tax Return -- Distinguishing Characteristics from Trust Income Tax Returns," *Fiduciary Income Tax Practice* (IICLE, 1990).

Author, "Major Recent Developments Impacting on the Preparation of Fiduciary Income Tax Returns," *Fiduciary Income Tax Practice* (IICLE, 1990).

Author, "How to Use Grantor Retained Income Trusts to Reduce The Gross Estate," *Successful Estate Planning Strategies And Ideas* (Prentice-Hall, 1990).

Author, "What Every Estate Administration Lawyer Positively, Absolutely, Definitely has to Know About Tax Returns," *Estate Administration Program* (IICLE, 1990).

Author, "The Effective Use of GRITs To Reduce the Gross Estate," *68 Taxes -- the Tax Magazine* 524 (Commerce Clearing House, July, 1990).

Author, "IRS Rulings Demand More Careful Use of Revocable Trusts to Make Gifts," *17 Estate Planning* 332 (Warren, Gorham & Lamont Inc., November/December, 1990).

Author, "The Viability of Grantor Retained Interest Trusts to Reduce Transfer Tax Exposure in Light of the Revenue Reconciliation Act of 1990," *8 Boston University Journal of Tax Law* 1 (1990).

Co-Author, "Protection Afforded Uncompensated Directors and Officers of Illinois Not for Profit Corporations -- Fact or Fiction?" 79 *Illinois Bar Journal* 172 (April, 1991).

Author, "The Strategic Use of Lifetime Gifting Programs to Reduce Estate Taxes in Light of Recent Congressional and Internal Revenue Service Antipathy Towards Transfer Tax Reduction Devices," 39 *De Paul Law Review* 365 (1991).

Co-Author, "Valuation of Closely Held Stock for Transfer Tax Purposes: The Current Status of Minority Discounts for Intra-Family Transfers in Family Controlled Corporations," 69 *Taxes - the Tax Magazine* 309 (Commerce Clearing House, May, 1991).

Author, "Estates and Trusts File the Same Return, But Under Different Rules," 47 *Journal of Taxation for Accountants* 172 (Warren, Gorham & Lamont Inc., September, 1991).

Author, "Corporate and Partnership Estate Freezes in Light of Chapter 14 and the Proposed Regulations," 18 *Estate Planning* 259 (Warren, Gorham & Lamont Inc., September/October, 1991).

Author, "Grantor Retained Interest Trusts and Planning Strategies Under Chapter 14 and the Proposed Regulations," 18 *Estate Planning* 329 (Warren, Gorham & Lamont Inc., November/December, 1991).

Co-Author, Chapter 18, "Probate and Estate Planning," Annual Survey of 1991 Illinois Law (IICLE, 1991).

Co-Author, "Proposed Regulations Address Adjustments and Lapsing Rights," 19 *Estate Planning* 3 (Warren, Gorham & Lamont Inc., January/February, 1992).

Co-Author, "Maximizing the Use of the State Death Tax Credit in Minimizing the Overall Estate Tax Burden," 19 *Estate Planning* 104 (Warren, Gorham & Lamont Inc., March/April, 1992).

Co-Author, "A Taxpayer's Death Triggers Many Filing Requirements," 50 *Taxation for Accountants* 187 (Warren, Gorham & Lamont Inc., March, 1993).

Co-Author, "Reconciling Post-Mortem Returns and Tax Penalty Exposure: A Guide Through the Maze," 71 *Taxes* 497 (Commerce Clearing House, August, 1993).

Co-Author, "Illinois Estate Tax Practice Pointers" 81 *Illinois Bar Journal* 590 (1993).

Author, "Towards an Elimination of Internal Revenue Code Abuses: The Real Implications of the New Transfer Tax Valuation Rules: Success or Failure" 47 *Tax Lawyer* 885 (Georgetown Law School, Summer, 1994).

Co-Author, "The Case for the Retention of the State Death Tax Credit in the Federal Transfer Tax Scheme: 'Just Say No' to a Deduction," 21 *Pepperdine Law Review* 695 (Summer, 1994).

Author, "Using a Multi-Class Corporation to Achieve Estate and Gift Tax Savings: Does It Work After Chapter 14?," 44 *Syracuse Law Review* 1153 (1993).

Co-Author, "The Strategic Allocation of Estate Planning Fees to Achieve Tax Savings," 22 *Taxation for Lawyers* 218 (Warren, Gorham & Lamont Inc., January 1994)

Co-Author, "Personal Liability of Corporate Officers and Directors," *Legal Checklists*, 7-19.1 (1993).

Author, "Reducing the New Transfer Tax Valuation Rules to Their Basics: Can Partnerships be Used for Practical Gift Leveraging?" 11 *Journal of Partnership Taxation* 239 (Warren, Gorham & Lamont, Inc., Fall, 1994).

Author, "Calculating the Potential for Transfer Tax Savings in Personal Residence Retained Interest Trusts," 80 *the Journal of Taxation* 232 (Warren, Gorham & Lamont, Inc., 1994).

Co-Author, "Informing Clients of the Deductibility of Estate Planning Fees: An Old Strategy Revisited," 8 *Probate and Property* 32 (September/October 1994).

Co-Author, "The Florida Estate Tax: Beware the Nuances," 68 *Florida Bar Journal* 48 (December 1994).

Author, "Partnerships as the Answer to an Archaic Tax Provision: Retaining Interests in Gifted Assets in a Permissible Way to Avoid Estate Tax," 19 *Estates, Gifts and Trusts Journal* 205 (1994).

Co-Author, "Drafting and Payment Considerations Under the South Carolina Estate Tax", 6 *South Carolina Lawyer* 34 (1995).

Co-Author, "Deductibility of Estate Planning Fees: an Old Strategy Revisited," republished in *The Monthly Digest of Tax Articles*, April, 1995.

Author, "Coordinating Buy-outs and Installment Payment of Estate Tax," 22 *Estate Planning* 139 (Warren, Gorham & Lamont, Inc., May/June 1995).

Author, "Structuring Trusts to Permit the Donor to Act as Trustee," 22 *Estate Planning* 331 (Warren, Gorham & Lamont, Inc., November/December 1995).

Co-Author, "The Case for the Retention of the State Death Tax Credit in the Federal Transfer Tax Scheme: 'Just Say No' to a Deduction," republished in *The Monthly Digest of Tax Articles*, 1995.

Author, "Proper Premortem Allocation of Assets to Maximize Estate and Income Tax Planning - Part 1," *Journal of Asset Protection*, January/February (1996).

Author, "Proper Premortem Allocation of Assets to Maximize Estate and Income Tax Planning - Part 2," *Journal of Asset Protection*, March/April (1996).

Author, "Income Tax Planning Essentials for Estate Planning," *Basic Estate Planning Seminar* (IICLE, 1995).

Author, "Protecting Fiduciaries from Liability," *Estate Planning Short Course* (IICLE, 1996).

Author, "The Income Tax Essentials for a Family Limited Partnership," *Family Limited Partnerships* (IICLE, 1996).

Author, "Grafting a Leverage partnership onto a Family Limited Partnership," *Family Limited Partnerships* (IICLE, 1996).

Author, "When to Use a Family Limited Partnership," *Family Limited Partnerships* (IICLE, 1996).

Co-Author, "The Michigan Estate Tax: Effective Drafting and Payment Techniques," *Michigan Bar Journal*, 1996.

Author, "The Real Implications of the New Transfer Tax Valuation Rules--Success or Failure," Part of Synopsis of Federal Estate and Gift Tax Anthology, 1997 (Anderson Publishing Company)

Author, "An Examination of the Fully Phased-in Massachusetts Estate Tax: Drafting and Payment Techniques," 83 *Massachusetts Law Review* 97(Winter 1998).

Author, "Using Non-Qualified Stock Options in Estate Planning," *Taxes*, Vol. 7, No. 3 (January 1999).

Author, "Using Options to Allow Donees to Have the Donor's Cake and Eat It, Too," 77 *Taxes - The Tax Magazine* 277 (March, 1999).

Author, "Creative and Strategic Estate Planning for Transfer of Qualified Retirement Assets," 87 *Illinois Bar Journal* 9, 445-504 (September, 1999).

Author, "Defensive Strategies for Potential Will and Trust Contests," *Probate & Property* (November, December 1999)

Author, "Fiduciary Liability Concerns," presented at the DuPage County Annual Bar Association Mega Meeting on January, 1999.

Author, "Introduction to Forms: Review of Marital Deduction Formula," presented at the IICLE Estate Planning and Practice Seminar in Chicago, and Champaign Springfield, in January, 1999.

Author, "Review of Qualified Personal Residence Trust Form," presented at the IICLE Estate Planning and Practice Seminar in Chicago, and Champaign, in January, 1999.

Author, "Essential Income Tax Issues in the Formation and Operation of the Partnership," presented at IICLE's, "Using Pro Rata Partnerships for Advanced Estate Planning Purposes: a Practitioner's Guide," seminar in May, 1999.

Author, "Post-Mortem," presented at the Illinois CPA Society in May, 1999.

Author, "Using Non-Qualified Stock Options to Achieve Estate Tax Savings," presented at the 23<sup>rd</sup> Annual American Institute on Federal Taxation Seminar, Birmingham, Alabama on June 24, 1999.

Author, "Using Aggressive Estate Tax Strategies in an Age of Estate Tax Uncertainty," presented on Behalf of the Tax Committee of the Chicago Bar Association Seminar on Tax Planning on September 28, 1999.

Author, "Estate Planning and ESOP's: Innovative Opportunities for Business Owners," presented on behalf of the Young Lawyers Section of the Chicago Bar Association on October 6, 1999.

Author, "Post-mortem Tax Planning," presentation at the McGladrey & Pullen Tax Conference, Kansas City, MO on October 22, 1999.

Author, "Charitable Lead & Charitable Remainder Trusts," presentation at the McGladrey & Pullen Tax Conference, Kansas City, MO on October 23, 1999.

Author, "Estate Planning in an Uncertain Environment," presented at the Hickory Point Bank and Trust, FSB seminar in Decatur, Illinois on November 4, 1999.

Author, "The Basics of Estate Planning," IICLE seminar in Springfield, Illinois, on November 5, 1999.

Author, "Financial Analysis of Charitable Lead & Charitable Remainder Trusts," presented at the Chicago Botanical Garden and Children's Memorial Foundation Veteran's Day Charitable Planning Workshop: "Hot Topics" for the Planning Professional on November 11, 1999.

Author, "The Basics of Estate Planning," IICLE seminar in Chicago, Illinois, on November 12, 1999.

Author, "Family Limited Partnerships," Northwest Suburban Estate Planning Council on November 18, 1999.

Author, "Creative and Defensive Planning When Qualified Retirement Assets Constitute the Bulk of the Family's Wealth," Greater Chicago Society of the ICFP on December 14, 1999.

Author, "Private Annuities and Their Use in Creative Estate Planning," presentation at the Harris Bank Financial Group seminar, January, 2000.

Author, "To Sell or GRAT: Selecting Between Grantor Trust Sales and Grantor Retained Annuity Trust Selections," presented to the Business Valuation Association (BVA) on February 24, 2000.

Author, "Defensive Strategies for Potential Will and Trust Contests," *GPSolo*, Best of ABA Sections, Vol. 17, No. 2 (March, 2000).

Author, "Expanding the Frontiers of Creative Estate Planning: Avant Garde Techniques Your Father Didn't Tell You About," presented at the Chicago-Kent College of Law's 19<sup>th</sup> Annual Federal Tax Institute, May 4-5, 2000.

Author, "Post-Mortem for Income Taxes," presented at the Illinois CPA Society's 2000 Estate & Gift Tax Conference on May 16, 2000.

Author, "Living with a Living Trust," *Home Furnishings Retailer* (July, 2001).

Co-Author, "Fees in Estate Administration and Guardianship Matters," chapter 7, Contested Estates (Illinois Institute of Continuing Legal Education Treatise, 2002).

Co-Author, "Estate, Generation and Gift Tax Procedures," chapter 8, Estate Administration (Illinois Institute of Continuing Legal Education Treatise, 2003).

Co-Author, "The Sham Transaction Doctrine," Trusts and Estates Magazine (February, 2003).

Co-Author, "Total Return Trusts Give Trustees Flexibility in Ever-changing Markets," Illinois Bar Journal (May, 2003).

Author, "Estate Administration Value Added Billing," Chicago Bar Record (May, 2003).

Author, "Behavioral Finance and Portfolio Management as they Related to the Validity of Family Limited Partnerships," Trusts and Estates (November, 2003).

Author, "Behavioral Finance and Portfolio Management as they Related to the Validity of Family Limited Partnerships," reprinted in the Tax Law Abstracts: Practitioners Series (Legal Scholarship network, 2003).

Author, "The Treasury Creates Good Vibrations: The Final Regulations Under Code Sec. 643," Journal of Passthrough Entities (January-February 2005).

Author, "Kimball and Thompson: The Federal Appellate Courts Diverge in Belief," Journal of Passthrough Entities (May-April 2005).

Author, "Insuring the Efficacy of Your Irrevocable Life Insurance Trust," Journal of Passthrough Entities: (January-February 2005)

Co-Author, "The Interplay of Behavior Economics and Portfolio Management with the Current Examination of Family Partnerships by the Courts," Real Property, Probate and Trust Journal, Volume 40, Number 1 Spring 2005

Author, "We know it When We See it: How to Draft GRATs to Zero Them Out for Gift Tax Purposes," Journal of Passthrough Entities (September-October 2005)

Co-Author, "Oral Trusts: Are They Valid? Along with Nuncupative (Oral), Holographic (Written) and Joint (Mutual) Wills, While not Good Estate Planning, They May Correct

Previous Mistakes. What About Joint Revocable Trusts?," for use at the National Law Foundation's 2006 Mid-Winter Estate Planning Conference (St. Croix, U.S. Virgin Islands).

Author, "The Federal Government Giveth and the State Government Taketh: Drafting for Decoupled State Death Taxes," (January/February, 2006) Journal of Passthrough Entities.

Author, "Funding Buy-Out Obligations for the Closely Held Business Owner," Wealth Watch (2006)

### Books

Co-Author, *Sorting out Life's Complexities: What You Really Need to Know about Taxes, Wills, Trusts, Powers of Attorney, Retirement Plans, and Health Care Decisions* (Simon & Schuster Higher Education Group, 1992).

Co-Author, *Sorting out Life's Complexities: What You Really Need to Know about Taxes, Wills, Trusts, Powers of Attorney, Retirement Plans, and Health Care Decisions* Second Edition (Simon & Schuster Higher Education Group, 1994).

Co-Author, *Drafting Wills and Trusts in Illinois* (Illinois Institute of Continuing Legal Education (1997)). (Awarded one of two "Awards of Outstanding Achievement" by the Association for Continuing Legal Education, 1998.)

### Lectures

"Planning Techniques After the Tax Reform Act of 1986," presented at the Fiduciary Income Tax Practice Seminar on January 20, 1989.

"Obtaining 501(c)(3) Status for Economic Development Organizations: A Guide for Attorneys" (Community Economic Development Law Project, 1989).

"Analysis of Recent Statutory and Other Developments and Their Impact on Completing the New Form 706," presented at the IICLE Advanced Estate Administration Program on June 9, 1989.

"The Viability of Hanging Powers In Trusts After TAM 8901004; and Reducing Estate Taxes By Naming Beneficiaries as Fiduciaries," presented at the IICLE Advanced Estate Planning Program on October 18, 1989.

"Issues Likely to Confront the Preparer of an Estate Income Tax Return -- Distinguishing Characteristics from Trust Income Tax Returns," presented at the IICLE Fiduciary Income Tax Practice Seminar on January 25, 1990.

"Major Recent Developments Impacting on the Preparation of Fiduciary Income Tax Returns," presented at the IICLE Fiduciary Income Tax Practice Seminar on January 25, 1990.

“What Every Estate Administration Lawyer Positively, Absolutely, Definitely Has to Know About Tax Returns,” presented at the IICLE Estate Administration Program in June, 1990.

“Reducing the Gross Estate -- True Safe Harbors.” presented to the Chicago Bar Association, Trust Law Committee in 1990.

“Personal Income Tax Planning: An Overview of Hidden Pitfalls and Available Planning Strategies,” presented to various groups.

“An Introduction to Charitable Gifting,” presented on behalf of the Art Institute of Chicago.

“Revocable Lifetime Trusts,” presented to various church groups.

“An Examination of the Effectiveness of Grantor Retained Interest Trusts as Transfer Tax Reduction Devices after the Revenue Reconciliation Act of 1990,” presented to the Chicago Bar Association, Tax Law Committee and Probate Practice Committee, and the Fox Valley Estate Planning Council in 1990.

“Use of Discount Limited Partnerships and Other Planning Opportunities for Closely Held Business Owners,” presented at the VECO annual seminar and to the Fox Valley Estate Planning Council, 1991.

“A Decade of Changes in Estate Tax Laws and Their Impact on the General Tax Practitioner,” presented to the Chicago Bar Association Taxation Committee on March 23, 1993.

“Using Partnerships for Estate Planning Purposes,” ISBA Federal Taxation Section, Law Ed Series, on January 10 and January 24, 1994 (Peoria and Chicago).

“Partnerships and Estate Planning: Beyond the Basics,” presented to the Chicago Bar Association Taxation Committee on October 6, 1994.

“A Practical Guide to Estate Administration,” presented at the National Business Institute, Inc. May, 1994 and November 1994

“Applying Sophisticated Estate Tax Reduction Strategies to the Limited Liability Company Format”, presented at the Illinois Limited Liability Company Seminar Sponsored by the Chicago Bar Association Federal Taxation Committee October 6, 1994.

“Use of Partnerships in Estate Planning,” presented at the American Conference Institute, on Business Succession Planning on October 4, 1994.

“The Ten Essentials for the Non-Estate Planning Tax Practitioner,” presented to the Chicago Bar Association Taxation Committee on January 24, 1995.

“Marital Deduction Planning Beyond the Marital Clause - Partial QTIP Elections,” presented to the Chicago Bar Association Trust Law Committee, Division II, March 20, 1995.

“Split Dollar Life Insurance,” presented to the Chicago Bar Association Trust Law Committee, Division II, April, 1995.

“Closely Held Business Planning,” presented at the Chicago Bar Association seminar on Business Succession on April 17, 1996.

“Protecting Fiduciaries from Liability: New Opportunities and Challenges for Estate Planning Professionals: Considerations in the Drafting of Estate Plan Documents and Administration of Trusts and Estates,” presented at the American National Bank on April 9, 1997.

“Protecting Fiduciaries from Liability,” presented at the Illinois Institute of Continuing Legal Education Estate Planning Short Course in the April and May of 1996.

“The Initial Estate Planning Conference,” presented at the North Suburban Bar Association Seminar on Estate Planning in March, 1997.

“Closely Held Business Planning For the C Corporation,” presented at the Chicago Bar Association Seminar on C Corporations in September, 1996.

“Donors Acting as Trustees,” presented at the American College of Trust and Estate Counsel Regional Meeting in Mackinac Island, August 1996.

“Protecting Fiduciaries From Liability,” presented at the Chicago Estate Planning Council in December, 1996.

“The Income Tax Essentials for a Family Limited Partnership,” presented at the IICLE Seminar on Family Limited Partnerships, in October, 1996.

“Income Tax Aspects of Post-Mortem Administration,” presented at the Chicago Bar Association Seminar on Basic Probate Primer: Decedent’s Estates on January 15, 1997.

“Grafting a Leverage partnership onto a Family Limited Partnership,” presented at the IICLE Seminar on Family Limited Partnerships, in October, 1996.

“When to Use a Family Limited Partnership,” presented at the IICLE Seminar on Family Limited Partnerships, in October, 1996.

“Introduction to Forms: Review of Marital Deduction Formula,” presented at the IICLE Estate Planning and Practice Seminar in Chicago, Peoria, and Collinsville, in May/June 1997.

“Review of Qualified Personal Residence Trust Form,” presented at the IICLE Estate Planning and Practice Seminar in Chicago, Peoria, and Collinsville, in May/June 1997.

“Review of QTIP Form Annotated,” presented at the IICLE Estate Planning and Practice Seminar in Chicago, Peoria, and Collinsville, in May/June 1997.

“The Qualified Personal Residence Trust.” (Presented to Coleman, Epstein & Berlin (June, 1997).

“Protecting the Fiduciary Holding a Closely Held Business from Liability,” presented at the National Trust Association of Closely Held Business Annual Meeting, Lake Geneva, Wisconsin (September 26, 1997)

“Selecting the Correct Business Format for Advanced Estate Tax Planning,” presented at the Chicago Bar Association’s Seminar on New Developments in using Entities in Business and Estate Planning, on October 6, 1997.

“Income Tax Planning for Partnerships,” presented at the Illinois Institute of Continuing Legal Education Seminar on Practical Guidance for Family Limited Partnerships, in Peoria and Chicago (October 9 and October 17, 1997).

“Fee Arrangements and Ethical Responsibilities for Family Limited Partnerships,” presented at the Illinois Institute of Continuing Legal Education Seminar on Practical Guidance for Family Limited Partnerships, in Peoria and Chicago (October 9 and October 17, 1997).

“IRS’s New Weapon -- Business Purpose,” presented at the Chicago Bar Association Federal Taxation meeting, October 28, 1977.

“New Estate Planning Opportunities Under the 1997 Tax Plan,” presented at the Epilepsy Foundation Annual meeting (November 19, 1997).

“Protection of the Executor from Liability,” presented at the Chicago Bar Association Probate Practice Seminar (November 12, 1997).

“Protection of the Executor from Liability,” presented at the Greater North Shore Estate Planning Council on November 19, 1997.

“Dynasty Trust Presentation: A New Law (the Illinois updated rule against perpetuities) Provides New Options,” presented at the Chicago Bar Association Trust Law Committee (November 17, 1997).

“Income Tax Aspects of Post-Mortem Administration,” presented at the Chicago Bar Association Seminar on Basic Probate Primer: Decedent’s Estates on March 2, 1998.

“Introduction to Forms: Review of Marital Deduction Formula,” presented at the IICLE Estate Planning and Practice Seminar in Chicago, and Springfield, in January, 1998.

“Review of Qualified Personal Residence Trust Form,” presented at the IICLE Estate Planning and Practice Seminar in Chicago, and Springfield, in January, 1998.

“Review of QTIP Form Annotated,” presented at the IICLE Estate Planning and Practice Seminar in Chicago, and Springfield, 1998.

“Valuation Overview of Fractional Interests in Estate Planning,” presented at the 18th Annual Chicago Kent School of Law Tax Conference, in May 1998.

“Representing the Green Trustee,” presented at the 41st annual IICLE Estate Planning Short Course in Chicago and Champaign, May, 1998.

“Using Sales to Grantor Trusts as an Effective Means to Gift Discounted Assets,” presented at the Chicago Bar Association Gift and Estate Tax Subcommittee, May, 1998.

“Practical Drafting to Minimize Fiduciary Liability” presented at the Illinois CPA Society/Foundation 1998 CPA Estate & Gift Tax Conference, Rosemont, IL in May, 1998.

“Representing the Individual Trustee,” presented at the International Accounting Association Annual Meeting, Chicago, IL in June, 1998.

“Navigating Chaotic Waters: Defensive Strategies in Anticipation of Litigation,” presented at the Illinois Institute of Continuing Legal Education Program: “Estate Planning for Subsequent Marriages: Alternative Living Arrangements,” Fall, 1998.

“Creative and Defensive Planning When Qualified Retirement Assets Constitute the Bulk of the Family’s Wealth,” Presented at the Illinois State Bar Association Program:

“Estate Planning: Important Recent Developments,” Fall, 1998.

“The Top Ten Hot Estate Planning Techniques,” presented at the Chicago Bar Association Federal Taxation Committee Meeting, September 29, 1998.

“Using Non Qualified Stock Options to Achieve Estate Tax Savings,” to be presented at the University of Chicago Annual Tax Conference, Fall, 1998.

“Fiduciary Liability Concerns,” presented at the DuPage County Annual Bar Association Mega Meeting on January, 1999.

“Introduction to Forms: Review of Marital Deduction Formula,” presented at the IICLE Estate Planning and Practice Seminar in Chicago, and Champaign Springfield, in January, 1999.

“Review of Qualified Personal Residence Trust Form,” presented at the IICLE Estate Planning and Practice Seminar in Chicago, and Champaign, in January, 1999.

“Essential Income Tax Issues in the Formation and Operation of the Partnership,” presented at IICLE’s Using Pro Rata Partnerships for Advanced Estate Planning Purposes: a Practitioner’s Guide Seminar in May, 1999.

“Post-Mortem,” presented at the Illinois CPA Society in May, 1999.

“Using Non-Qualified Stock Options to Achieve Estate Tax Savings,” presented at the 23<sup>rd</sup> Annual American Institute on Federal Taxation Seminar, Birmingham, Alabama on June 24, 1999.

“Using Aggressive Estate Tax Strategies in an Age of Estate Tax Uncertainty,” presented on Behalf of the Tax Committee of the Chicago Bar Association Seminar on Tax Planning on September 28, 1999.

“Estate Planning and ESOP’s: Innovative Opportunities for Business Owners,” presented on behalf of the Young Lawyers Section of the Chicago Bar Association on October 6, 1999.

“Post-mortem Tax Planning,” presentation at the McGladrey & Pullen Tax Conference, Kansas City, MO on October 22, 1999.

“Charitable Lead & Charitable Remainder Trusts,” presentation at the McGladrey & Pullen Tax Conference, Kansas City, MO on October 23, 1999.

“Estate Planning in an Uncertain Environment,” presented at the Hickory Point Bank and Trust, FSB seminar in Decatur, Illinois on November 4, 1999.

“The Basics of Estate Planning,” IICLE seminar in Springfield, Illinois, on November 5, 1999.

“Financial Analysis of Charitable Lead & Charitable Remainder Trusts,” presented at the Chicago Botanical Garden and Children’s Memorial Foundation Veteran’s Day Charitable Planning Workshop: “Hot Topics” for the Planning Professional on November 11, 1999.

“The Basics of Estate Planning,” IICLE seminar in Chicago, Illinois, on November 12, 1999.

“Family Limited Partnerships,” Northwest Suburban Estate Planning Council on November 18, 1999.

“Creative and Defensive Planning When Qualified Retirement Assets Constitute the Bulk of the Family’s Wealth,” Greater Chicago Society of the ICFP on December 14, 1999.

“Private Annuities and Their Use in Creative Estate Planning,” presentation at the Harris Bank Financial Group seminar, January, 2000.

“To Sell or GRAT: Selecting Between Grantor Trust Sales and Grantor Retained Annuity Trust Selections,” presented to the Business Valuation Association on February 24, 2000.

“Expanding the Frontiers of Creative Estate Planning: Avant Garde Techniques Your Father Didn’t Tell You About,” presented at the Chicago-Kent College of Law’s 19<sup>th</sup> Annual Federal Tax Institute, May 4-5, 2000.

“Post-Mortem for Income Taxes,” presented at the Illinois CPA Society’s Annual Estate & Gift Tax Conference held on May 16, 2000.

“Issues to examine on the Audit of Estate Tax Returns based on Creative Estate Planning,” presented in 5 parts during the Internal Revenue Service’s Annual Tax Seminar for its Estate Tax Attorneys, held in Chicago on July 11-12, 2000.

“Advanced Tax Planning,” presented at the BDO Seidman Advanced Family Income and Wealth Transfer Tax Planning Program on July 17, 2000.

“Case and Valuation Update, Including an Analysis of the Estate Planning Strategies Used by Practitioners that Create Valuation Controversies,” presented at the NACVA 2000 Regional Symposium on Current Issues in Gift and Estate Tax Valuations in Annapolis, Maryland, on September 1, 2000.

“Judicial Meddling in Estate and Gift Tax Valuations: A Review of New Valuation Cases and What They Mean to Practitioners,” presented on behalf of the Tax Committee of the Chicago Bar Association Seminar on Tax Planning on September 28, 2000.

“Gift and Estate Taxes: Planning Opportunities Associated with the Granting of Non-qualified Equity Options,” presented at the Chicago Bar Association’s Seminar entitled, “Tax Considerations for the Receipt of Property as Compensation for Services,” in Chicago on October 26, 2000.

“Estate Tax Repeal: What Will It Mean to the Estate Planning Professional? The Importance of Valuation in the Current Uncertain Estate Tax,” presented at the Hickory Point Bank Annual Recent Estate Planning Developments Seminar on November 2, 2000.

“Expanding the Frontiers of Creative Estate Planning: Avant Garde Techniques Your Father Didn’t Tell You About,” presented at the McGladrey & Pullen, LLP 2000 Annual Tax Conference on November 11, 2000.

“Hot Topics for Estate Planning Professionals Estate Tax Repeal: What Will It Mean to the Estate Planning Professional?,” presented at the Chicago Botanic Garden 2<sup>nd</sup> Annual Veteran’s Day Charitable Planning Workshop on November 13, 2000.

“Judicial Meddling in Estate and Gift Tax Valuations: a Review of New Valuation Cases and What They Mean to Practitioners,” presented on behalf of the Greater North Shore Estate Planning Council on November 15, 2000.

“Case and Valuation Update, Including an Analysis of the Estate Planning Strategies Used by Practitioners That Create Valuation Controversies,” presented at the NACVA 2000 Regional Symposium on Current Issues in Gift and Estate Tax Valuations in Las Vegas, Nevada on December 1, 2000.

“Planning in an Age of Uncertainty,” presented at the CBA Estate and Gift Tax Division Meeting on December 7, 2000.

“A Review of the Estate Administration Attorney’s Role in Tax Planning and Tax Preparation Post-Mortem,” presented at the Chicago Bar Association Seminar Series entitled “Basic Tax Primer: Decedent’s Estates” on March 2, 2001.

“The Practical Lawyer’s Update on Using Family Limited Partnerships in 2001 and Beyond,” presented with Igor Potym at the 44<sup>th</sup> Annual IICLE Estate Planning Short Course on April 20, 2001 in Chicago and May 4, 2001 in Champaign.

“Year 2001: What’s Really New (and Important) in Estate Planning?,” presented at the 20<sup>th</sup> Annual Chicago-Kent College of Law Illinois Institute of Technology Federal Tax Institute on May 4, 2001.

“Advanced Partnership Planning Techniques,” presented at the annual Illinois CPA 2001 Estate & Gift Tax Conference on May 9, 2001.

“The Practical Update on Using Family Limited Partnerships in 2001 and Beyond, Including Post-mortem Partnerships,” presented at the annual TAG International Seminar in San Diego, CA on May 17, 2001.

“Estate Planning under the New Estate Tax Law Frontier: Its Real Impact on Our Current Practice (On Forms, Strategies, Demeanor and Clients),” presented at the Chicago Bar Association, Federal Taxation Committee Seminar on September 25, 2001.

“Drafting Issues Under the New Tax Law,” presented as part of the ISBA Law Ed Series Primer on New Tax Law and Other Developments on September 28, 2001.

“Probate Practice: An Update on Recent Developments, Part I,” presented as part of the Chicago Bar Association CLE Seminar on October 17, 2001.

“Expanding the Frontiers of Creative Estate Planning: Avant Garde Techniques Your Father Didn’t Tell You About, Part 3,” presented at the McGladrey & Pullen LLP 2001 Annual Tax Conference, Milwaukee, WI, on November 9, 2001.

“Sophisticated Estate Planning for Physicians,” presented at the Harris Bank presentation, “Effective Trust and Financial Planning for Physicians in Today’s Environment: Accumulating and Protecting Assets for your Family,” in Chicago, IL, on November 13, 2001

“Estate Planning Under the New Estate Tax Law Frontier: Its Real Impact on Our Current Practice (On Forms, Strategies, Demeanor and Clients),” presented at the Hickory Point Bank and Trust, FSB seminar in Decatur, Illinois on November 14, 2001.

“Planning For Business Succession In An Evolving Business And Tax World: A Methodology for The Estate Planning Process presented at the Chicago Bar Association Seminar on “Planning for Business Succession,” on February 7, 2002.

Presentations on “A New Approach to Drafting,” “Marital Deduction Planning,” and “QTIP Trusts” for the 2002 IICLE Seminar on Drafting For Contemporary Estate Plans on February 20, 2002 and March 7, 2002.

“A Review of the Estate Administration Attorney’s Role in Tax Planning and Tax Preparation Post-Mortem,” presented at the Chicago Bar Association Seminar Series entitled “Basic Tax Primer: Decedent’s Estates” on March 7, 2002.

“Self-Canceling Installment Notes” presented before the Chicago Financial Planning Group on April 24, 2002.

“Funding Trusts: Practical Studies of Common Provisions” presented as part of IICLE’s Spring 2002 Estate Planning Short Course w/Stacy Singer in Champaign on May 2, 2002.

“Some Random (and not so random) thoughts on Estate Planning after EGTRAA 2001,” presented at the Chicago-Kent 21st Annual Federal Tax Institute on May 3, 2002.

“Timely Tax Topics” presented during RSM McGladrey’s Estate Planning Web Conference on July 25, 2002.

“IRAs and Family Limited Partnerships” presented before the Chicago Loop Council of the Financial Planning Association with Robert S. Held on August 28, 2002.

“The 15 Most Important Recent Developments And Their Impact On Our Estate Planning Practice: Expected And Unexpected, September, 2001 to September, 2002,” presented with Robert S. Held before the Federal Taxation Committee of the Chicago Bar Association on September 24, 2002.

“Estate and Gift Tax for the Experts,” presented on October 22, 2002, along with Irwin Goldstein at the RSM McGladrey 2002 Tax Conference.

“Creative Estate Planning,” presented on October 23, 2002, at the RSM McGladrey 2002 Tax Conference.

“Funding Credit Shelter/Marital Deduction Trusts: Practical Studies of Common Provisions and a Pragmatic Approach to the Area,” presented before the Chicago Estate Planning Council on October 23, 2002

“The Steps to Effective Funding of Marital and Credit Shelter Trusts,” presented at the Hickory Point Bank 2002 Annual Presentation on November 6, 2002.

“Alternative Billing Arrangements In Estate Administration: How to Demonstrate Value and Obtain Value Added Billing in the Current Estate Administration Fee Structure: A Consideration Of Alternatives,” presented as part of the Attorney Fees In Probate And Estate Planning Chicago Bar Association Probate Practice Committee Seminar on November 7, 2002.

“The 15 Most Important Recent Developments and Their Impact on Our Estate Planning Practice: Expected and Unexpected,” presented on November 12, 2002 at the Charitable Planning Workshop For Estate Planning Professionals sponsored by Bank One, Chicago Botanic Garden and the Greater North Shore Estate Planning Council.

"Tax Savings with Individual Retirement Accounts and Family Limited Partnerships," presented along with Robert S. Held at the Harris Bank Estate Planning for Retirement Benefits 2002 Seminar on December 4, 2002.

"Lifetime Gifting," presented along with Robert S. Held at the Illinois CPA Foundation's Estate & Gift Tax Conference on May 6, 2003.

"Family Partnerships in Estate Planning: The Basics and the Not so Basics," presented at IICLE's 46th Annual Estate Planning Short Course held on May 8-9, 2003.

"Issues Involving Estate Planning for Foreign Citizens", presented at the ABA Annual Tax Conference on June 21, 2003.

"The Sale to the Grantor Trust Strategy," presented at the Hickory Point Bank and Trust, FSB seminar in Decatur, Illinois, on November 14, 2003

"Gifts: From A to C: About Basics Complications," presented before the Chicago Bar Association.

"The Optimist (§643 Regulation), the Pessimist (The FLP Landscape) and the Lawyer (Circular 230)," presented at the CBA Federal Taxation Committee Meeting on February 24, 2004.

"Family Partnerships in Estate Planning: The Not so Basics: Where are We in a Post *Strangi II* World?" presented along with Robert S. Held before the Harris Bank Financial Advisory Group on February 10, 2003.

Practical Issues Involving Family Limited Partnerships," presented before the DuPage Estate Planning Counsel on February 17, 2003.

"Basic Probate Primer: The A, B, C's of How to be a Probate Attorney," presented at the Chicago Bar Association Probate Primer Seminar on March 4, 2004.

"The Essence Of Family Partnerships: The Basics and the Not So Basics," presented at the IICLE 47<sup>th</sup> Annual Estate Planning Short Course (May, 2004)

"Estate Tax Returns and Analysis," presented before the IICLE Estate Administration Program on May 25, 2004.

"Creative but Basic Estate Planning: The ABC's, But Not as Simple as Do Re Mi," presented on June 21, 2004 at the RSM McGladrey 2004 Tax Conference.

"Fees in Estates and Trusts," presented at the Estate, Trust and Guardianship Litigation course by IICLE on September 1, 2004.

"FLP Chaos and GRAT Planning - What's an Estate Planner To Do?" presented at the Chicago Bar Association's Federal Taxation Full Committee Meeting on September 28, 2004.

"The Estate Planners' Guide to Valuing the Closely Held Business: Cutting Through the Patina to the Real Deal," presented on October 7, 2004, at the 30th Annual Notre Dame Tax and Estate Planning Institute.

"GRATs: The New Viagra of Estate Planning," presented on October 8, 2004, at the 30th Annual Notre Dame Tax and Estate Planning Institute.

"Life Insurance and Annuity Arbitrage," presented at the day long ACTEC seminar for the Fall Meeting in Pittsburgh.

"Business Valuation (and Valuation Discounts) Made Understandable for Estate Planners," presented as part of the 14th Annual Estate Planning with the Masters Series on October 26, 2004.

"A Good Idea Comes of Age in 2004: Why GRATs Are the Sophisticated Estate Tax Planning Strategy of Choice" and "How to Avoid Self-Dealing When a Family Member Is the CEO of Your Private Foundation," presented at the Charitable Planning Workshop for Estate Planning Professionals, Chicago Botanic Garden, on December 9, 2004, sponsored by JP Morgan.

"How to effectively optimize and integrate FLP and FLLC structures for Advanced Estate planning," presented at the Mastering Tax & Estate Planning - Ensuring Successful Wealth Transfer, Institute for International Research seminar on January 26, 2005 in Coral Gables, Florida.

"Valuation and Planning with Non Qualified Options," presented before the American College of Trust and Estate Council Annual Meeting Employee Benefits Committee, February 27, 2005, in Orlando, Florida.

"Review and Analysis of Pending Developments Regarding Partnership," presented before the DuPage County Bar Association, March 1, 2005.

"Joint Trust and Their Use," presented as part of the CBA Trust Law Seminar on "Dealing with New Complexities in Estate Planning," March 29, 2005

"The Top 10 Income Tax Strategies for Estate Planners," presented at the 48th Annual Estate Planning Short Course, sponsored by the Illinois Institute for Continuing Legal Education on April 28th, 2005.

"Valuation Essentials for Estate Planners," presented on May, 2005, to the Estate and Gift Annual Meeting of the Illinois CPA Society.

"Casey Jones, Who's Driving that Insurance Train: Letting an Investor Bet on When You'll Die,," presented at the Summer Meeting of the American College of Trust and Estate Council in June, 2005. Co-Author, "The Interplay of Behavior Economics and Portfolio Management with the Current Examination of Family Partnerships by the Courts," Real Property, Probate and Trust Journal, Volume 40, Number 1 Spring 2005

"We know it When We See it: How to Draft GRATs to Zero Them Out for Gift Tax Purposes," Journal of Passthrough Entities (September-October 2005)

"The Federal Government Giveth and the State Government Taketh: Drafting for Decoupled State Death Taxes," (February, 2006) Journal of Passthrough Entities.

Author, "Funding Buy-Out Obligations for the Closely Held Business Owner," Wealth Watch

"Estate Tax Preparation," presented at the IICLE Estate Administration Course (2005).

"Basic Probate Primer: The A, B, C's of Tax Filings in Estate Administration," presented as Part of the Chicago Bar Association's Probate Primer Seminar on September 7, 2005

"Implications of *Strangi* on FLPs," presented on September 13, 2005, via teleconference as part of IICLE's Continuing Legal Education Program.

"Better Than Sliced Bread? How to Use Joint Trusts," presented at the 31st Annual Notre Dame Tax and Estate Planning Institute, September, 2005.

"The Drafting Police: Here to Protect and Serve," presented at the 31st Annual Notre Dame Tax and Estate Planning Institute, September, 2005.

"The Drafting Police: Here to 'Protect and Serve'," presented at the Chicago Bar Association's Probate Practice Seminar on November 16, 2005.

"Joint Trusts in Separate Property States: Just Say 'Yes' . . . Sometimes," presentation on March 16, 2006, at the Greater North Shore Estate & Financial Planning Council seminar.

Joint Trusts and Life Insurance, presentation on May 10, 2006, at the Ohio State Bar Association's 17<sup>th</sup> Annual Estate Planning Conference on Wealth Transfer.

"Federal Estate and Gift Tax Considerations," presentation on June 8, 2006, at the IICLE Probate Maze.

"Premium Finance and Other Emerging Strategies Used to Acquire Life Insurance," presentation on September 22, 2006, at the 41<sup>st</sup> Annual Southern Federal Tax Institute.

### Memberships and Activities

Past-Commissioner of Lawyers Softball Association; Chicago Bar Association: Federal Taxation Committee (Past-Chairperson of the Estate and Gift Tax Division), and Trust Law Committee; Illinois Bar Association; American Bar Association; Chicago Estate Planning Council; Federal Tax Institute Advisory Board; Experience as Expert Witness; Standard Club, American College of Trust and Estate Counsel (Illinois State Chair).

Honors and Professional Achievements

Fellow, American College of Trust and Estate Counsel; Elected, Best Lawyers in America.com; Elected, Advisory Committee (<1% of all Illinois attorneys); Leading Lawyers.com; Elected, Illinois Super Lawyers; Elected, Worth Magazine's 100 Top Estate Planning Lawyers.