Steve Leimberg's Estate Planning Email Newsletter - Archive Message #2848

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From: Steve Leimberg's Estate Planning Newsletter

Subject: Joy Matak, Sandra D. Glazier & Martin M. Shenkman - Estate Planning Si Series for Late 2020, Part 6: Parting Thoughts on Planning and Practical Re

2020 (the little that is left of it) may very well be the best opportunity to implement planning strategies to mitigate federal estate taxes and accomplish estate, asset protection and other objectives.

As the final weeks turn into the final days of 2020, the bustle of the holidays and the promise of an effective COVID vaccine bring joy to the hearts of weary Americans, many estate planners are still crushed with last minute projects. Hopefully, some of the idea outlined in this series will have been helpful:

- *Leveraging wealth out of a large estate using COVID-affected valuations*
- *Considering variations on Domestic Asset Protection Trusts, Spousal Lifetime Access Trusts, Life Insurance Trusts, Grantor Retained Annuity Trusts*
- *Refinancing intra-family loans or making new low interest intra-family loans*
- *Factoring in basis step-up planning through the possible use of Community Property trusts and Upstream planning*

- *Using enhanced techniques for installment note sales to accomplish various planning objectives*
- *Incorporating Non-Grantor trusts into estate plans*

Using the currently high temporary exemptions is at the heart of planning in late 2020 for moderate wealth clients. This planning rings similar in many ways to the crush of planning in late 2012 when there was a similar fear that the exemption might be reduced substantially in the following year.

The stakes in these last few days of 2020 could be extremely high. With a $900 billion COVID stimulus package passing Congress in the waning days of 2020, and the expectation that the incoming Biden administration will seek additional COVID stimulus in order to address the widespread consequences of the pandemic, some form of increases in taxes to meet the ever burgeoning deficit may be anticipated. Control of the Senate hangs in the balance as two contentious Senatorial races in Georgia head towards a runoff on January 5, 2021. President-elect Biden has outlined his priorities, setting forth a wish list that will require funding to accomplish. It is quite possible that the federal government will remain divided following the conclusion of the January 2021 runoff in the two Georgia races that will decide control of the Senate. If the federal government remains divided for the coming years then the prospect of making the current lifetime exemptions permanent is diminished. Any changes to the estate tax with a divided Congress may not happen. Perhaps a Biden administration will do whatever it can through regulatory means to implement its objectives.

Even naysayers dismissing the possibility of massive tax legislation early in the Biden presidency, regardless of the results in the Georgia Senate runoffs, concede that there is still so much that remains unknown about the future of taxes. Career politicians in Washington understand that the failure to deliver comprehensive measures to address the unemployment, housing, and food crises facing the nation□s populace could lead to a massive progressive wave in 2022 on a scale that could rival the 2018 elections. It is quite likely that there will be some change in the nation□s tax laws to address increasing deficits resulting the pandemic and related stimulus packages.

This final installment of the planning series offers some parting thoughts and practical reminders:

1. *Incorporate state income tax planning into a comprehensive estate plan*
2. *Revisit credit shelter basis planning*
3. *Last minute GST tax planning*
4. *Recommendations for safer estate planning.*

Joy Matak, JD, LLM, Sandra D. Glazier, Esq. and **Martin M. Shenkman, Esq.** provide members with the final installment of their 6 part series, which includes parting thoughts on planning and practical reminders.[iii] Members will find their commentary most helpful as it contains a number of sample drafting clauses.

Here is their commentary:
COMMENT:
State Income Tax Planning for Clients and Trusts Planning PostCOVID
State income tax planning for clients individually and for their non-grantor trusts may be evolving because of the pandemic. Even though it appears no place was safe from the spread of COVID, there appears to be a developing dynamic of clients exiting large congested urban areas for what,
in a time of pandemic era, may be viewed as safer suburb and rural areas. This creates an opportunity for residency and domicile planning that may not have existed previously. Clients who may have been unwilling to entertain the thought of moving to a lower tax jurisdiction may now embrace it. As remote work environments have become common and ZOOM-time has replaced face time, clients may no longer feel tethered to their downtown office locations. In fact, many clients will be leading the change of domicile discussion for personal, not tax, reasons.
Declines in state revenues due to shutdowns and the increasing costs of addressing food and housing insecurity, healthcare disparities, the effects of systemic racism, policing issues and more, may lead to an increase in taxation by some state and local jurisdictions. In addition, it is not clear how
the incoming Biden administration might foster the reinstatement of state and local tax ("SALT") federal income tax deductions or other changes.
For these reasons, trust income tax planning warrants increased attention. The Supreme Court's decision in the Kaestner caseii has already been

discussed extensively in professional literature and this article will not delve
into the specifics of the case or provide a recitation of the facts. Rather, this
article seeks only to highlight the important message of the Kaestner decision.
Ultimately, in the Kaestner decision, the Court failed to settle whether it is acceptable for a state to tax a non-grantor trust based on the residency of the beneficiary. Instead, the Court merely identified facts that would not allow a state to tax a trust based on the beneficiary's residency.iii The Kaestner Court was particularly persuaded that a trust should not be taxed as a North Carolina resident trust solely on the basis of the beneficiary's residence where the beneficiary had no control over the assets of the trust, could not demand any trust income, and did not actually receive any income from the trust during the years in question.
There are important factors gleaned from Kaestner which might provide a rubric of issues to consider when structuring estate plans before the end of 2020:
• Decant trusts with mandatory distributions
Given the Court's emphasis on the beneficiary's inability to demand distributions, practitioners may consider decanting trusts, when terms of the instrument and governing law permit, to make the trust wholly discretionary.
The holding in Kaestner might suggest that a state may tax a trust based on the beneficiary's residency where the beneficiary can demand a distribution of the greater of 5% of the corpus of the trust or $5,000, as described more specifically in Section 2514(e) (commonly referred to as a "5 and 5 power").
The Kaestner decision might be construed to suggest that North Carolina, or any state with a similarly worded statute, might be able to tax any trust that requires distributions for health, education, maintenance and support (a so-called "HEMS standard"). Even a trust with an independent trustee could cause a state income tax under Kaestner because the beneficiary is eligible for distributions under a definite standard.
A state may be able to tax a trust where a beneficiary is entitled to distributions on the achievement of certain ages or milestones, under the holding in Kaestner.
In each of these circumstances, the safer course may be to decant

the trust into one that only permits discretionary distributions as determined by an independent trustee and does not provide for distributions at any specified age. If a decanting is still being completed for 2020 planning, then the above factors might also warrant consideration. If there is no decanting currently in process it is unlikely that it can be initiated before year end, nonetheless these ideas may be useful for 2021 follow up projects.

• Consider judicial modification without beneficiary approval

The trust at issue in the Kaestner case had been previously decanted from a trust that terminated at a specified age. Consider whether effectuating a non-judicial modification to curtail beneficiary control might taint the result as evidencing beneficiary control (in contrast to a decanting effectuated by the trustee). If the beneficiary must consent (or, at least, not object) to a non-judicial modification, might a court view that as the beneficiary actively participating in or controlling the decision? In contrast, it might be possible for decanting to be effectuated by the trustee with no beneficiary involvement. When evaluating structuring a trust transaction as a non-judicial modification (in which all involved may consent or not object) versus a decanting, a decanting may be preferable to avoid an issue of beneficiary involvement. This may also be an important factor in a divorce.iv

• Avoid making distributions

If possible, avoid making distributions to a beneficiary who resides in a state where such a distribution would trigger an undesired state income tax. For example, assume that a state determines taxability of the trust based on the residency of the beneficiary. The terms of the trust may permit loans to the beneficiary, which may address shortterm cash needs. Any loan must carry adequate interest and be memorialized with appropriate documentation evidencing an intent on the part of the beneficiary to pay the loan back. Actual payments by the beneficiary to the trust may be needed. The loan may need to be secured by the beneficiary's property. It is advisable the trust avoid making regular or periodic loans to the beneficiary that look more like distributions than loans.

Alternatively, there may be opportunities for the trust to make payments on behalf of the beneficiary without causing taxability of the trust in the state of the beneficiary's residence. By way of example, if the trust were to acquire a property outside the beneficiaries' home

state and allow the beneficiary to live in it, this would not necessarily cause the trust to be taxable under the state law at issue in Kaestner (though it may cause inclusion if the property were located within the state).

Theoretically, if a person in a non-fiduciary capacity directed the trustee to transfer funds from the trust to a named person, pursuant to a power of appointment, such a payment may not be deemed a "distribution" and the recipient might not be deemed a "beneficiary" in a traditional sense because, generally, only a fiduciary can make distributions to a beneficiary. However, it is unclear how the taxability of the trust under such circumstances would be determined under the Kaestner holding.

• Choose an institutional trustee in a tax-friendly jurisdiction

The residence of individual trustees is a crucial factor in determining a state's ability to tax income of a trust. In the Kaestner case, no trustee lived in North Carolina. Consider choosing an institutional general trustee based in a tax friendly jurisdiction in lieu of a friend or family trustee in the taxing jurisdiction. Doing so could be helpful in avoiding state taxation. When drafting trusts in late 2020, there can be an advantage creating such trusts with situs in trust friendly jurisdictions as opposed to the high tax home state of a client. However, given the time that it generally takes for corporate fiduciaries to review and accept appointments, it may be difficult to get an institutional trustee to accept a nomination to act as trustee before year-end. Therefore, if a client wishes to have an irrevocable trust created before the end of 2020, a family member or friend may need to be initially appointed with the goal of replacing the trustee next year with an institutional trustee located in a tax friendly situs. That approach, however, has to be implemented carefully as once a trust is formed in a particular state, it may be "stickier" to move it out than had it been initially formed in a trust friendly jurisdiction.

It may prove much less costly to pay an institutional trustee to serve as trustee in a state with no tax. This may be particularly so because an institutional trustee is generally better than an individual acting as trustee in making sure a trust adheres to formalities that could bolster the trust's defenses against a challenge by a beneficiary's state attempting to tax the trust's income.

Even if the trust has named an institutional trustee to serve as trustee, there are still some ways to allow family members to

participate in the administration of the trust:
1. Ensure that the family member is not a resident of a jurisdiction where such residency would be used to create a state tax which would not otherwise be owed by the trust and name that person as Trust Protector.
2. Give such person only the power to act in a non-fiduciary capacity. Though the array of positions and powers in a modern trust might still give rise to state taxation as the law in that regards develops.
3. Organize an LLC in a tax-friendly jurisdiction. Name the LLC as trust protector and outline the specific powers and responsibilities such entity would have over the trust. Identify one or more family members to serve as manager(s) of the LLC, with the power to make decisions on behalf of the LLC. Be mindful, and caution clients, that having your sister-in-law as manager of an LLC performing services in your home state may not suffice (using the LLC shield) to negate state taxation. While use of an LLC provides a layer of protection, the nature of the tasks, the involvement, the administration of the structure and other factors may all prove relevant in determining tax situs. However, using an LLC in the trust's tax friendly jurisdiction may be an improvement. Documenting that actions are taken outside the home state may be better still. But the bottom line is that there may still be uncertainty.

It would seem that taking these extra steps – and adhering to the rules established by the forum– may avoid state income taxation of the trust, or at least reduce the risk of home state taxation.

• Avoid certain contacts with the taxing jurisdiction

In the Kaestner case, the Court pointed out that the trust lacked several contacts with North Carolina. Though it was not entirely clear that the holding of the case hinged on the lack of these contacts, a safer course for any trust seeking to avoid state taxation would be to take note of these points:

1. In Kaestner, the trust records were physically located outside of North Carolina. It is not clear whether this inquiry will continue to be relevant in the modern digital age. In any event, Kaestner makes clear that a trustee should not store physical records in the taxing jurisdiction whose authority to

tax is sought to be avoided.
2. Trust asset custodians were located in a state other than the taxing state in Kaestner. Might it be possible to select an office or division of a particular custodian or manager that will help strengthen the nexus (or lack of nexus) argument?
3. The trustee should try to engage investment advisors physically located outside of the taxing jurisdiction and prefer advisors which do not have locations within the jurisdiction if possible.
4. The trust should avoid renting or owning an office in the taxing state.
5. The trust should avoid owning real property or tangible personal property in the taxing state. Therefore, if the trust acquires property for the beneficial use of a beneficiary, consider dividing the trust so as to avoid tainting the entire trust corpus for taxation purposes. Alternatively, creating an LLC to own that real or tangible property may transmute the property into an intangible asset thereby reducing or even negating the issue.
6. The trust should not have any direct investments in the taxing state. Some states take the position that any active business in their state will taint the entire income of the trust as taxable. If that situation affects a trust, consideration may be given to dividing the trust. Many trust documents permit the trustee to divide the trust for a variety of reasons. If not, state law might permit division. If that is not the case, decanting may provide another possible way to cure this state tax issue.
7. The number of meetings between the trustee and beneficiary may be relevant. The Court noted: “the trustee’s contacts with Kaestner were ‘infrequent.’” Therefore, consider having beneficiary meetings in a tax neutral location. Where is a Zoom meeting based?

Credit Shelter Basis Planning Risk

Once high lifetime exemptions from gift and estate tax were introduced and
incorporated into the estate planning rules, some practitioners may have advised clients to consider terminating credit shelter trusts or distribute appreciated assets out of a credit shelter trust in order to garner a basis

step-up on the death of the surviving spouse.
Now that the country is facing a potential drop in lifetime exemptions, terminating or distributing assets out of a credit shelter trust to gain a basis step-up might prove to be a very costly gamble if the surviving spouse dies after the exemption drops.
Practitioners who worked with clients on this type of planning may wish to revisit those arrangements before the end of 2020 – and the potential decrease of the exemption from its current high of $11.58 million. A gift back to a similar trust to use exemption might be worthwhile.
Maximize GST Tax Planning Before Potential Changes
Another foundation of planning has been to shift value to an irrevocable trust and allocate generation skipping transfer ("GST") tax exemption to the
trust. Properly done, under the current system, the value of assets in that GST exempt trust, no matter how much those assets appreciate, should avoid future estate transfer taxation. The compounding of wealth outside the estate tax system can provide incredible wealth shifting opportunities. When this is coupled with a long-term trust (dynastic trust), wealth may (under the current tax regime) compound outside a client's estate forever.
Progressive proposals, such as that introduced by Sen. Sanders (VT) (S. 309), would appear to limit application of the GST exemption to a maximum
of 50 years. Gridlock in Washington could usher in a progressive wave in 2022 and force the incoming Biden administration to the left, making it possible for this type of proposal to gain traction at some future date, even if not in 2021.
Such a change would hinder GST-type planning and might result in a costly
tax after 50 years of a trust's existence. If a change along the same lines as
the Sen. Sanders' proposal is enacted, but if it "grandfathers" existing trusts
(i.e., the new restrictions only apply to trusts formed after the new law), many people, even those of moderate wealth, might benefit from creating long-term irrevocable dynastic trusts now.
Making a late allocation of GST exemption to trusts that were not GST exempt may still be feasible in the waning days of 2020. Even if there is inadequate time to decant an older trust into an improved trust before year end, if GST is allocated to make the trust exempt, the decanting may be

addressed in 2021.

Practice Safer Estate Planning

The closer to the end of the year, and the more last minute a plan, the more cautious practitioners may need to be. If a practitioner will even undertake planning in late December for a current or new client, it may be advisable to question why such last-minute decisions are being made. Try to gain some understanding as to the client's reasoning, what delayed the planning, and whether the client is really understanding and comfortable with rushed last minute planning. If commitments already made make it impractical or improbable for the planning objective to be met on a timely basis, perhaps the engagement should be declined.

The current lifetime exemption of $11.58 million per person could very well decline to $5 million (adjusted for inflation) or lower. For many clients, making gifts in smaller amounts is insufficient to address their concerns about changes in the law that could be lurking on the horizon. For this reason, so many clients are contemplating dramatic transfers that could severely reduce their personal wealth level.

Thus, the goal to practice safer may be even greater than it may have been in 2012. Before working with clients to move substantial swaths of wealth out of their taxable estates, it could be helpful to analyze whether the client will retain sufficient assets to provide for lifestyle expenses and to lower the risk of a fraudulent conveyance challenge. Further, it may be more important than ever to use structures that preserve potential access to the assets transferred (for all but the uber-wealthy clients) because of the large dollar value of many of these last minute gifts. Perhaps it is advisable to incorporate a disclaimer provision in irrevocable trusts to permit a trustee or beneficiaries to disclaim gift transfers.v Even if the practitioner has concerns with that mechanism, other mechanisms which might provide the client with an "out" have been discussed in earlier segments of this series.

Malpractice risks and issues are significant. Safer practice is worth considering by all advisers, including not just attorneys and CPAs, but banks, trust companies, wealth advisers and more. Despite (or perhaps especially because of) significant pressure placed on billable hours and revenue generation (whether as hours billed or assets under management or otherwise) every one of the allied professions might wish to reassess

practice methods and disclaimers included in memorandum, etc.

Add Caveats to Letters and Memorandum

Consider using caveats to caution clients about the uncertainty of 2020 planning and the uncertainty of what, if any, tax law changes might occur:

• It is impossible to predict what tax law changes may occur, or not, or what the effective date (e.g. grandfathering) of any future legislation may be.

• Planning done in anticipation of a certain outcome or legislative action may prove worthless, and even worse due to tax audit risk, transaction costs, and reduction or loss of access to assets, flexibility, etc.

• A wealth tax, capital gains tax on death, elimination of basis step up on death, lower gift, estate and GST tax exemptions, may be enacted. GRATs may be restricted, discounts reduced or eliminated, assets in grantor trusts included in the grantor's estate, and more.

The uncertainties of future legislative changes are impossible to predict, and transactions undertaken prior to knowing such legislative changes may
not achieve the intended goals.

General Caveats to Consider

Consider the following:

• Adding cautionary language to cover letters.

Sample Clause: "Estate planning is inherently complex and subject to varying interpretations. Applicable federal, state and local laws change frequently. Ongoing review and maintenance of every plan and document is essential. There is no assurance that any particular result will be realized. There are risks and negative consequences to every planning step and technique. It is impossible to enumerate all of the risks and consequences in any communication. There is a possibility that a planning strategy implemented today will be nullified by a new rule, law and/or a court case tomorrow. By proceeding with this planning, you accept these risks."

• Adding cautionary language to retainer agreements or footers on bills, or both.

Sample Clauses:

Risks; No Guarantees: You understand and acknowledge that the results of any plan are never guaranteed. Numerous aspects of many, if not most, estate and related plans are not

only uncertain, but subject to a wide spectrum of different views by other advisers, the courts, the IRS, and other authorities. Most strategies have negative consequences (e.g. save estate tax, lose basis step-up). Many common strategies, techniques and transactions are subject to tax, legal, financial, and other risks and uncertainties. While we endeavor to identify some of the risks of a plan, all risks and issues with each component of a plan are not possible to identify or communicate. Creating a collaborative team may help identify more issues with your plan. Further, the fact that we communicate verbally or in writing certain risks should never be interpreted as an indication that any such listing or communication is a complete listing of every risk involved. The risks of any transaction can be further compounded by improper administration of the plan, failure to meet annually to review and update the plan, or changes in family dynamics, the tax and/or other laws may reduce (or eliminate) any projected benefits. Such risks may even result in more costly results than had no planning been pursued.

The above caveat about “no guarantees” and “risks” in every transaction may have particular relevance for 2020 planning. There is simply no way any practitioner can predict what might occur. If no changes in the law occur, or if the effective dates do not provide for grandfathering, it is possible that current planning could prove worse than had no action been taken.

Audit and other Risks: Any estate or transaction may be subjected to audit which creates a risk of undesired or unintended consequences. Possible challenges may emanate from risks we communicated to you, while others may not have been discussed. Challenges by the government as part of the audit process might cause inclusion of assets previously transferred out of your estate in your estate. After audit, assets that had been transferred out of the estate as part of recommended strategies may be adjusted to their date of death value, which could result in tax related liabilities such as those attendant to capital gains, depreciation recapture, and/or a negative capital account. You agree that we shall not be liable for any assessments of tax, interest, or penalties resulting from our recommendation or your decision to implement any strategy.”vi

Adding cautionary language as a preamble to estate planning and other memorandum.

Sample Clauses:

Disclaimer Statements and Risks:

Information Will Not Suffice to Avoid Tax Penalties or Interest Charges: The information in this memorandum, in any attachment, or cover letter (including previous and subsequent correspondence during this engagement) are not intended to be or used to: i) avoid any penalties imposed by the IRS or any state tax authority; or, ii) promote, market or recommend to any other party any tax-related matter such as an investment, product, service, advice or position.

Law Changes: The suggestions, analysis, and discussions contained in this Planning Memorandum are based upon the applicable federal, state and local tax and other laws in effect as of the date of this Planning Memorandum unless otherwise noted. Such authority may change in the future, and such change may be applied retroactively. A change in state law may impact income, estate or other tax consequences. [Law Firm] assumes no responsibility to update this memorandum, or notify you in any manner, if the applicable law changes. Federal and state taxing authorities, regulatory agencies, the IRS, and the courts are not bound by the analysis herein and may take very different views or interpretations of the law, the facts or both. The analysis contained herein supersedes all prior oral and written discussions, if any, pertaining to the issues involved and may be modified by subsequent communications. Various strategies may have been recommended, but there is no assurance that the IRS or state tax authorities, other governmental agencies, regulatory bodies or courts will accept the analysis provided. While a number of associated risks have been discussed, possible challenges could be asserted which may not have been discussed or even contemplated. [Law Firm] is are not responsible or liable, to any extent, for any gift tax, income tax or estate deficiencies or assessments,

interest, or penalties that may arise, or the results of any court holding including the piercing or disregarding of entities, trusts or transactions.vii There may now be proposed Federal, state tax or other legislation which, if enacted, could modify or eliminate the benefits of many strategies if not grandfathered. The IRS, state tax authorities, opposing counsel, and others have, and may continue to, attack various strategies and techniques that may be suggested in this Planning Memorandum.

Your Responsibilities: [Law Firm] has relied upon your assertion that the information, facts and assumptions provided are true, correct, and complete. However, [Law Firm] has not independently audited or otherwise verified any of the information, facts or assumptions. A misstatement or omission of any fact or a change or amendment in any of the assumptions relied upon may require a modification of all or a part of the discussions or suggestions contained in the Planning Memorandum. In addition, the suggestions provided and discussions had were based on the facts and assumptions as asserted to [Law Firm] by you and are at best only current as of the date of this Planning Memorandum. [Law Firm] has no responsibility to update this Planning Memorandum, or otherwise notify you, for events, circumstances or changes in any of the facts or assumptions occurring after the date of this Planning Memorandum or the date of any communication to you. It is the responsibility of the client to engage [Law Firm] or another adviser to revisit these matters from time to time, especially if: there is a change in (i) your planning, (ii) the assumptions upon which these matters were based, (iii) your circumstances which impacts the discussions or suggestions contained in this Planning Memorandum; or, there is a notification via general communication from our office or through the general media which indicates a change has or may occur that could impact your plan. It is your responsibility to consider all communications [Law Firm] disseminates as well as general media coverage of events and contact [Law Firm] should any perhaps apply to you, your

planning or this Planning Memorandum.
Options; Your Decision: Although [Law Firm] has attempted to aid you in the decision-making process, and may have suggested alternative recommendations verbally or in writing to help you achieve your objectives, and assist you in understanding how well each alternative might meet your estate planning objectives, the responsibility for estate planning decisions is solely yours. These services are not designed, and should not be relied upon, as a substitute for your own judgment, nor are they meant to mitigate the necessity of ongoing review. These services are designed to supplement your own planning and analysis and aid you in achieving your objectives.
Planners might provide a further caveat or add to sample language provided above, in order to reflect that for plans done late in 2020 time limitations may limit viable estate planning options as well as the time available to fully analyze, discuss and/or implement options.
Finally, practitioners might consider cautioning clients as to the concerns that rushed planning may create. One such concern might relate to the valuation process. At this late date, appraisers may not be able to complete a formal report in 2020, however, some may be willing to provide values to use followed by a later report. Some may not be able to even provide a value before year-end. So, for late December planning estimates of some sort might have to be used. That introduces a new element of risk into a plan. Will a valuation mechanism be respected if based on a mere estimate and not a formal appraisal? Perhaps transfers might have been or be (for the little time remaining) consummated on estimated values. Practitioners might document to clients the increased risks that these transfers, and the mechanisms used to address them, entail.

Conclusion

It remains important for Practitioners still engaged in late 2020 planning to inform and educate clients as to the unique nuances of the current late 2020 planning environment, and the changes that may be in the offing (or not). The potential for massive tax changes under the incoming Biden administration and by state legislatures across the country is unpredictable but yet vital for many clients to consider when attempting to engage in

proactive steps now. In this environment there are a range of planning considerations that affect how practitioners might practice estate tax minimization planning, income tax planning and more. Hopefully, this Roadmap series has been helpful in outlining some strategies to consider, opportunities to incorporate and options for planning safer.

HOPE THIS HELPS YOU HELP OTHERS MAKE A *POSITIVE* DIFFERENCE!

Joy Matak
Sandra Glazier
Martin Shenkman

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