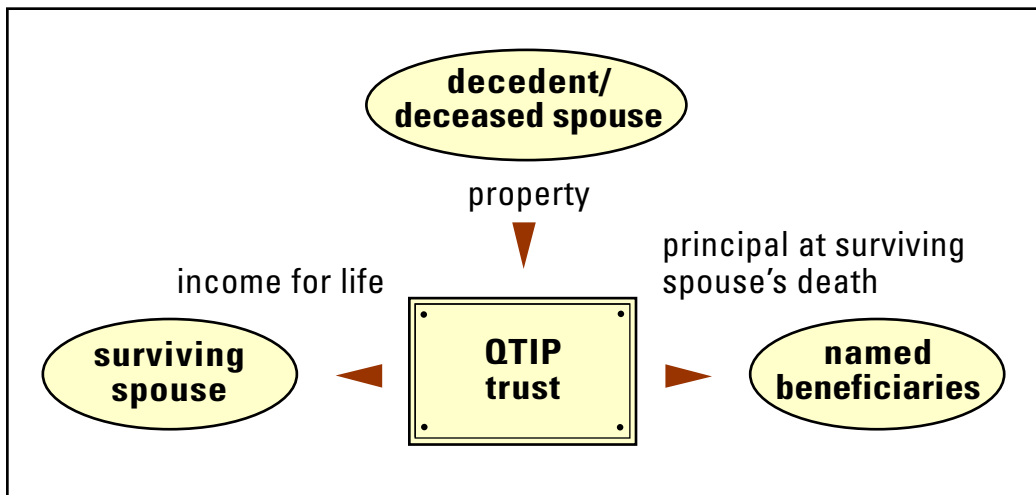


HOW THE QTIP TRUST WORKS



The first spouse to die directs by will that certain property be placed in a QTIP trust. The executor must elect whether to qualify the property for the marital deduction in the deceased spouse's estate.

All of the income from the trust must be paid to the surviving spouse no less frequently than annually.

The trust principal passes to beneficiaries designated by the first spouse after the death of the surviving spouse.

The surviving spouse has the right to force conversion of nonproductive property into productive property.

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