

801.1(c)

Michael Verne

From: [REDACTED]
Sent: Tuesday, April 08, 2003 7:57 AM
To: Michael Verne
Subject: Question about trusts

Grantor establishes an irrevocable annuity trust, which pays the grantor annual income for life, with trust corpus payable to designated third party beneficiary upon grantor's death. Is the annual income a "reversionary interest in the corpus" for purposes of 801.1(c)(3)? I would think not, in which case this type of trust would qualify as a separate person for HSR purposes? Do you agree?

[REDACTED]

AGREE THIS DOES NOT CONSTITUTE
A REVERSIONARY INTEREST IN THE
TRUST.

B. Mell
4/8/03

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