

- Mortgage loans related to the underlying exempt property, 0804014 (Apr. 28, 2008);
- Accounts receivable from real estate or other business (Sept. 1, 1999);
- A facility, mode of transportation, or other tangible personal property exempt under 802.2(d). Informal Int. 0700014 (6/1/00, 2007) and Informal Int. 0800013 (6/1/11, 2008)
- Goodwill associated with the acquisition of homebuilding assets, exempt under 802.2(d). Informal Int. 0503022 (Mar. 29, 2005) and Informal Int. 9602016 (6/1/96, 2000)
- Intangible personal property, including patents, trademarks, and copyrights, exempt under 802.2(d). Informal Int. 0800013 (6/1/11, 2008)
- Financial services business (title insurance), exempt under 802.2(d), and
- A corporate airplane.

Other than the corporate airplane, (Mar. 29, 2005), we believe the assets of the trust are exempt from the definition of CC. If the trust's exempt assets is below \$112,000 and as such, the trust is not required to file a return.

We would be glad to discuss this further.

Thank you,

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