



NEWS, Practitioner's Strategies, **Trust Planning for the 21st Century: An Introduction to the Inheritor's Trust/**

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Even the most novice among estate planners will ordinarily provide for a bypass trust at the death of the first to die of a married couple. This type of planning is used even in instances where the ability to control the disposition of the property at the death of the surviving spouse is not a factor. The benefits derived from a bypass trust include (1) avoiding estate tax at the death of the surviving spouse, (2) providing protection against creditors of the surviving spouse, and (3) creating opportunities for the surviving spouse to shift value to the bypass trust in order to reduce the taxes that will be payable at the death of the surviving spouse. The perceived "cost" of this approach is negligible, because, typically, all of the assets of the bypass trust are controlled by the surviving spouse and available to the surviving spouse to the extent that they are needed.¹

However, the question must be asked, can the basic bypass trust concept be improved and expanded upon? The affirmative answer to that question comes in the form of the Inheritor's Trust/. The Inheritor's Trust can be viewed as a bypass trust for beneficiaries other than a surviving spouse who, in most instances is controlled either immediately or upon attaining maturity, by the primary beneficiary of the trust, e.g., a child (the "Inheritor"). For the same reasons that the bypass trust is "too good to pass up," the authors believe that at least one Inheritor's Trust should be included in virtually every estate plan. Also, as this article will demonstrate, the Inheritor's Trust is superior to the typical bypass trust in a number of important ways.

What is an "Inheritor's Trust"?

The Inheritor's Trust, like many bypass trusts, is designed to give the inheritor control and beneficial enjoyment of the trust property, as close to outright ownership as possible, without compromising the ability to avoid transfer taxes at the beneficiary's death as well as the ability to protect the trust assets from creditors. The over-riding concept is that assets *received* and *retained* in trust are protected from unnecessary exposure to the beneficiary's predators - including a divorcing spouse, a creditor, or the IRS. This trust must be funded by someone other than the inheritor.

The design of the Inheritor's Trust(s) generally includes all or most of the following attributes:

1. Beneficiary has full control.

It has been our experience that clients are extremely pleased that their descendants and other objects of their bounty (and, if they respond candidly, themselves) can receive protection from creditors and from taxation, to the extent property is received in the form of an Inheritor's Trust. In most instances, however, the trust vehicle is desirable to the inheritor only if he or she is either placed in control, (or, if the inheritor is not sufficiently mature, if he or she will eventually be

placed in control of the trust) and the Inheritor understands the virtues of receiving property in a trust he or she controls. The two vital components of control are managerial control and control of the office of trusteeship.

Management control —generally, the beneficiary will be in “full control” of the trust as trustee, except that an independent (or special) trustee will have tax sensitive powers. Therefore, the beneficiary will have all investment and management control in his capacity of trustee just like he would have if the property were owned outright, except for life insurance on his own life. Although the beneficiary can even have the power to make distributions to himself based on an ascertainable standard, such as support, health and education, without considering any other resources that might be available, we recommend against that structure since it might compromise some of the tax savings, as well as the creditor protection.

There are several variations as to the choice of trustee. For example, many clients use professional trustees, such as a trust company as the independent trustee. Some clients place full investment control in the hands of the primary beneficiary/trustee, some clients appoint the trust company to manage the assets while other clients shift the investment control to the inheritor in stages as the inheritor matures. The variations are virtually unlimited, so long as any tax sensitive powers do not ever become lodged in a beneficiary/trustee’s hands in a manner that would result in adverse tax or creditor exposure. The use of an experienced professional trustee often makes sense so that the integrity of the trust vehicle is never compromised.

Control of identity of trustees —typically, the inheritor will be (at the appropriate time) the trustee in charge of all non-tax sensitive decisions. At such time as the grantor desires, the beneficiary will generally control the identity of the independent trustee. The ability to fire and replace the trustee need be limited only by the restrictions necessary to preserve the tax status, i.e., the beneficiary cannot appoint a trustee who is related or subordinate pursuant to Code Sec. 672(c) (see Rev. Rul. 95-58, 1995-2 CB 191). There is no requirement that a confrontational relationship exist. The office of independent trustee may be occupied by the beneficiary’s best friend.

Sometimes, clients are concerned about “burdening” their children with a trust. They are accustomed to the idea of phased outright distributions of principal (e.g., 1/3 at ages 25, 30, and 35) or their children are already adults who they perceive as ready to receive their inheritances outright.

Fortunately, if the advisor does a good job explaining the operation of the bypass trust (surviving spouse can control) and the benefits of the bypass trust (estate tax avoided on whatever it may grow to and creditor protection), the client will see that, essentially, the Inheritor’s Trust can be a bypass trust that does not have to wait for a spouse to die in order to be created and that can provide tax savings and creditor protection for multiple generations.

Obviously, for many beneficiaries it makes sense to defer control until they are sufficiently mature. Fortunately, it is easy to achieve this result by deferring control until the age(s) that the beneficiary would have otherwise received outright distribution. Indeed, for an *inter vivos* Inheritor’s Trust the grantor may retain this decision, as well as the decision as to the identity of the trustee without transfer tax exposure (Rev. Rul. 95-58).

2. Changeable

Generally, the inheritor will be given broad, special powers of appointment (re-write powers) that allow the inheritor to change the terms of the Inheritor’s Trust or even to terminate the trust.

The re-write power is tax neutral so long as a general power of appointment is not created. Therefore, the inheritor/power holder may amend the trust by exercising the power in favor of anyone other than himself, his estate or the creditors of either, in trust or outright, without transfer tax exposure Code Sec. 2041(b)(1), and Code Sec. 2514(c). Generally, this amendment power is given to the descendants on a per stirpital basis.

The restrictions necessary to avoid general power of appointment status are for practical reasons meaningless. Although the beneficiary cannot exercise the power to benefit his estate, he may exercise it to benefit the beneficiaries of his estate or to a trust (designed by the power holder himself) for the benefit of such beneficiaries. Furthermore, the trust can authorize a non-beneficiary to hold such a power to make distributions not subject to an ascertainable standard or to amend the trust. This person could be an independent trustee or a "trust protector" whose identity can be determined by the primary beneficiary provided that any person designated by the beneficiary must be a non-related, non-subordinate person who could be a substitute trustee as described in Rev. Rul. 95-98.

A broad special power of appointment is also helpful in protecting the beneficiary who controls his trust against interference from subordinate beneficiaries. Because such beneficiary can re-write the trust, it is unlikely that there will be any interference with the client's managerial and other functions by an adverse beneficiary whose participation could be eliminated.

3. Separate Exempt and Non-exempt Subtrusts

The Inheritor's Trust generally provides for separate GST tax-exempt and non-exempt subtrusts with inclusion ratios of either zero or one. This allows more efficient use of the grantor's GST exemption, for example, by allowing the trustee to make distributions to non-skip persons from a nonexempt subtrust, or to pay medical and educational expenses to the provider, a payment which is protected from GST exposure.

4. Perpetual

The Inheritor's Trust is dynastic, designed to continue for as long as applicable law permits. Clients may also forum shop to obtain a longer perpetuities period than would be otherwise available, by selecting a trust company with offices in a state that has abolished the rule against perpetuities.

5. Flexibility in Deciding Who Will Pay Income Tax

Separate trusts can be set up for (a) gifts where the transferor is treated as the owner (the typical income tax defective trust under Code Secs. 671-677 or Code Sec. 679); (b) gifts whereby the beneficiary is treated as the owner under Code Sec. 678; (c) trusts whereby someone (perhaps a child of the beneficiary or other "low-bracket" taxpayer) would be taxed as to the income; and, (d) transfers whereby the trust is taxed as a separate entity under Subchapter J. It is also important to avoid mixing different income tax results, which can create an accounting nightmare, and create mixed results.

Usually, defective trusts are structured so a wealthy taxpayer intentionally violates the grantor trust rules to be treated as the owner of the trust income and, thereby, reduce his estate by the income taxes paid. This enables the trust to grow income tax free and also enables the grantor to transact with the trust without income taxes to himself, his spouse or the trust (see Rev. Rul. 85-13, 1985-1 CB 184; Code Sec. 1041(a)(1)).

Another aspect to consider is tax bracket arbitrage. If a client has a parent (or grandparent) who is in a low income tax bracket, such parent (or grandparent) could fund an Inheritor's Trust in a manner to create grantor trust status as to the parent (or grandparent). If the trust corpus is invested in a favorable business opportunity which throws off income, that income would be taxed to the parent (or grandparent), taking advantage of the bracket differential.

Because the parent's (or grandparent's) income tax exposure will increase, fairness would dictate that the parent's (or grandparent's) income tax exposure be protected assuming they are unable to comfortably absorb the deficiency. One way to protect the situation would be to permit the trust to reimburse the parent (or grandparent) for tax liability incurred as a result of the grantor trust status (Rev Rul. 2004-64, IRB 2004-27, 7).

If the trust reimburses the parent, the growth of the trust will be adversely affected. Because most Inheritor's Trusts will be generation skipping, the adverse impact of such "leakage" will be accentuated. An alternative would be for the client to make annual exclusion gifts as well as to make medical payments directly to the provider, up to the amount of the shortfall. Another alternative would be for the client or the trust to make loans to the parent.

Additional benefits might be obtained with this structure. If the business or investment opportunity matured as anticipated, the parent (or grandparent) could exchange higher basis property of equal value (even cash or a note) with the low-basis investment so that there will be a basis step-up at the death of the parent (or grandparent).

Alternatively, the parent (or grandparent) could retain (or be given) a power, such as a power of appointment, that would cause estate inclusion at the parent's (or grandparent's) death. This could result in inclusion for estate tax purposes, and a step-up in basis, but would not result in any estate tax paid because it would be protected by the unified credit.

Another alternative would involve a beneficiary defective trust. An Inheritor's Trust can also be designed to be defective as to the beneficiary (via Code Sec. 678). We call such a trust a Beneficiary Defective Inheritor's Trust. Beneficiary-grantor trust status can be achieved by funding the trust solely with gifts subject to a power of withdrawal, provided that the grantor is not taxable on the trust income. Code Sec. 678(a) sets forth the general rule that a person other than the grantor will be treated as the owner of any portion of a trust for income tax purposes if that person has the power exercisable solely by himself to vest the corpus or the income in himself, or if that person has previously partially released or otherwise modified this power, and after the release or modification retained such control as would, within the principles of the grantor trust rules with respect to the trust creator, subject the grantor of the trust to treatment as the owner.

The Beneficiary Defective Inheritor's Trust can achieve a result whereby the power holder, who is treated as the owner, will have a trust with which he or she can transact business, including selling property to the trust, tax free, and take advantage of the same estate planning opportunities the grantor would have in a trust defective as to the grantor. Moreover, the power holder/beneficiary may be the trustee and also, as beneficiary, enjoy the benefits of the trust assets. The trust assets would be transfer tax exempt as well as, be protected against spouses, divorce, and creditors.

6. Creditor Protection.

An essential part of estate planning is asset protection. Thus, the Inheritor's Trust is designed to protect the trust property against claims of the beneficiary's creditors, including ex-spouses. In

light of our increasingly successfully litigious society and the fact that more marriages terminate by divorce than by death, informed clients generally want to incorporate protective measures in their estate planning.

In our experience, most clients faced with the simple inquiry —do you desire that your children's and grandchildren's inherited wealth be sheltered from loss to the IRS, or other creditors, including a disgruntled spouse —would answer in the affirmative. A candid client who is asked if he or she would like his or her own assets to be insulated from the same potential claimants usually also desires such protection.

Each of us has met clients who desire creditor protection and who inquire into the usefulness of either an off-shore or domestic asset protection planning trust. The jury is out on many aspects of those self-settled trusts. Clearly, the creditor protection (as well as the tax benefits) afforded by an Inheritor's Trust are superior to that of a self-settled trust. Even if we assume that the family unit will not do anything to cause liability, we all know that there is a reprehensible segment of our population, including ethically challenged lawyers, who will take advantage of the vagrancies and risks inherent in the judicial system. Why expose the wealth to the wrongful decision of a judge or jury?

Benefits from Inducing a Third Party to Create an Inheritor's Trust for Your Client

As planners, we tend to focus on planning for our clients' assets to eventually pass to the next generation. Ironically, the most powerful tool for achieving this objective in many cases is a tool that our clients can never hold in their own hands —the ability to create Inheritor's Trusts for themselves. The shelter of the Inheritor's Trust is only available if the trust is created and funded by someone other than the beneficiary and the trust assets remain segregated from the recipients' other assets.

If the client funded such a trust for the benefit of himself there would be estate tax inclusion. See Code Sec. 2036 and Code Sec. 2038. The so-called "string sections" of the Code include in a decedent's estate transfers for less than adequate consideration where the decedent had retained an interest in such transferred property. In addition to adverse tax consequences, a self-settled trust in most states would be accessible by creditors to the maximum amount that could be paid to the beneficiary, which would be the entire trust.

From a wealth conservation prospective, no other technique offers as much protection from taxes and creditors as an irrevocable trust, set up and funded by someone other than the beneficiary. This is true even though the beneficiary has the full use and beneficial enjoyment of the "in trust" property, including virtually "full control" over the property.

Dramatic Expansion of Planning Opportunities

An often overlooked opportunity is that even the affluent client should receive gifts and inheritances from others, virtually irrespective of size, in trust. By having an Inheritor's Trust in place, or having one set up in conjunction with the planning process of setting up the business or investment opportunity, the estate planning process can be simplified, and the client's goal of full control and enjoyment of the property can be achieved.

For our clients (many of whom are savvy in business and often so sufficiently affluent that they do not need the inheritance), most of whom are potential inheritors, and often recipients of periodic outright gifts, we suggest the Inheritor's Trust as the recipient of gifts and subsequent bequests rather than the client individually (or as some advisors suggest by passing the client

entirely or relying on the use of disclaimers). If you conclude that some (or any) of the many benefits illustrated in this article make sense, consideration should be given to having the client approach the potential transferor and request that gifts and bequests be made in trust, whereby the client/inheritor would control the design of the trust. Certainly, a transferor who would be inclined to transfer property outright should not object to making the transfer to an Inheritor's Trust which would be designed by the inheritor with rights and controls that would give the inheritor enjoyment virtually tantamount to (and as a result of predator protection benefits in excess of) outright ownership. It has been our experience that with proper counseling as to how an "in trust" gift or bequest improves the transfer, almost all potential donor/transferors will cooperate with the advised course of action.

When the client is about to embark on a new venture or has an investment opportunity with significant potential, consideration should be given to having the client's parent(s) or grandparent(s) (or any other person, including a spouse) create and fund a trust for the client. Money placed in a dynastic Beneficiary Controlled Inheritor's Trust/ funded by the client's parent(s) or grandparent(s) would provide the "seed" money for any such anticipated business venture or investment.

If the Inheritor's Trust is most advantageously designed, the entity may be placed in (1) an income tax defective trust so that the parent or grandparent is taxed; (2) a beneficiary defective trust so that the client is taxed; (3) a traditionally taxed trust; or, (4) interests in the entity may be allocated among the various trusts set forth above in (1) through (3).

As long as the client is not the original source of the "seed" money, (which course of action would result in the transaction being recast as a trust that was created by the client under the step transaction or agency theories), the normal rules of taxation should apply and the existence of the trust should be respected for both tax and asset protection purposes. Thus, the client can control the trust by being trustee, and can benefit from the trust assets as the primary beneficiary.

Maximizing the Benefits From An Inheritor's Trust

We will now discuss some "classic" strategies that work especially well in conjunction with Inheritor's Trusts.

1. Opportunity Shifting

One of the best, yet often overlooked, techniques to avoid the transfer tax system is the shifting of the opportunity to generate wealth from the client to others, including trusts. For planning purposes, it is far simpler, less risky, and more tax efficient to shift the opportunity to create wealth at the inception of an undertaking than to move wealth once value has become substantial.

For example, when a new business is formed or the family has an investment opportunity, a new entity may be formed and some or all of the equity interests in the new entity can be placed in irrevocable trusts. In many instances, the "seed" money is negligible in order to enable the recipient of the opportunity to acquire a significant interest in a venture that might explode in value. Obviously, transferring the opportunity while it has a low value ("tiny acorn") can avoid a huge amount of transfer taxes as compared with waiting until the value is very high ("mighty oak tree").

In most instances, the client, given a choice, would have the entire entity (as well as the fruits of the entity) available to him (as well as other family members), but in his full control. Even

though the more traditional planning could permit the client to obtain complete control of the entity regardless of the fact that he owns only a small portion of it by being a controlling general partner of a limited partnership, manager of an LLC, or holder of the only voting stock in a corporation, clients would be better served by having control of the entity (and preferably the entire entity) in a Beneficiary Controlled Trust. This leads to the counter-intuitive result that full management, use and enjoyment of property in an Inheritor's Trust will avoid transfer tax exposure under Code Sec. 2036 (See *A. Strangi*, 115 TC 478, CCH Dec. 54,135, etc.) in the foregoing planning arrangements. In addition, the Inheritor's Trust strategy would avoid creditor and divorce exposure based upon an argument that there was an "understanding" that the original estate owner would receive benefits from transferred property if he needed to access the property.

2. Valuation Planning

In many instances the client is willing to part with an interest in property, but desires to retain control over the property. A classic example of this is where the client forms a family limited partnership (FLP) and is willing to transfer limited partnership interests, provided the client can control the partnership through the retention of the general partnership interest. The property transferred will receive a significant valuation reduction for gift tax purposes by virtue of being a non-controlling interest; however, if the client has retained liquidation control, the value of the underlying assets held by the limited partnership interests retained at death will very likely be included and aggregated as part of the control block because of the control of the general partner. Thus, for example, assume a family limited partnership has a one-percent general partnership interest and a 99-percent limited partnership interest and that the client owns the one-percent general partnership interest and a 39-percent limited partner interest. In that case, the client would be deemed by the IRS to own the 40 percent as part of a control block.

The use of an Inheritor's Trust can resolve this problem. The Inheritor's Trust can be the general partner of the client's FLP. Even if the client is the trustee of the Inheritor's Trust, and as a result, controls the FLP in that capacity, the fiduciary control will not be imputed to him at death for estate tax purposes. Control held in a fiduciary capacity is not attributed to the decedent in his individual capacity. See *M. Bright Est.*, CA-5, 81-2 ustr ¶13,436, 658.F.2d 999; *L. Bonner, Sr. Est.*, CA-5, 96-2 ustr ¶60,237, 84.F.3d 196; *H. Mellinger Est.*, 112 TC 26, CCH Dec. 53,218, acq. 1999-2 CB xvi. Thus, all the decedent owned would be non-controlling interests, which would reduce the transfer tax significantly.

The same result should be obtained if other entities are used. For instance, if the Inheritor's Trust owned the one share of voting stock of a corporation and the 99-percent non-voting stock was owned outright by the client, the estate tax should be imposed upon only the fair market value of the non-voting shares, irrespective of the fact that the decedent had full control of the corporation as trustee.

3. The Inheritor's Trust Personal Retirement Plan Scenario

Cash value life insurance is attractive because it provides tax free compounding. The Inheritor's Trust can offer a superior vehicle for purchasing life insurance benefits that will not be included in the insured's estate. Estate tax avoidance can be accomplished by appointing an independent trustee over any life insurance in the trust on the inheritor's life and elimination of the inheritor's power of appointment over the life insurance on his own life. The inheritor may be given the power to remove and replace the insurance trustee (see IRS Letter Ruling 9832039). Also, the inheritor can be in full control of the trust if the life insurance is on the life of someone other than the inheritor.

The dilemma often faced with cash value life insurance used for retirement planning is that the estate owner wants both access to the internal build-up and also desires to keep the death benefits outside of the estate tax system. The estate tax exposure can be finessed by using an Inheritor's Trust that is be created by someone other than the client.

Taking advantage of the tax-free build-up in a policy that qualifies as a life insurance policy under Code Sec. 7702 can be preferable to its primary alternatives —pension plans and net income with make up unitrusts (NIMCRUTs). These latter two techniques are tax deferral (as distinguished from tax-free) strategies where a tax will be due when the fund is accessed. The life insurance alternative, on the other hand, can be superior since the internal buildup is available tax free by loans or partial withdrawals during the life of the insured provided that the policy is not a modified endowment contract (MEC). At death, the potential income tax exposure disappears.

4. Business Buy-Out

An Inheritor's Trust can open up some considerable planning alternatives when used in conjunction with a buy-sell agreement. In most instances, a cross-purchase is the method of choice because the acquirer will obtain a basis step-up. A problem often occurs because the last surviving purchaser will own 100 percent of the entity, and, in the absence of additional planning, the entire business, including all appreciation, will be included in such survivor's taxable estate.

Rather than have the interest acquired by the surviving owner, the planner should consider structuring the transaction whereby the purchase is made by an Inheritor's Trust. Where the buyout is insurance funded, the life insurance on the other owners would be acquired by the Inheritor's Trust. Upon the death of a co-owner, the decedent's interest would be transferred to a vehicle outside the reach of the transfer tax system, even though the control is in the hands of the surviving owner.

5. Avoiding or Deferring State Income Taxes

Do state income taxes apply to an Inheritor's Trust, and if so, can anything be done about it? The answer to the question is largely a matter of state law. Thus, an Inheritor's Trust with a trustee in a state with no income taxes, can be used to escape (or defer) substantial state income taxes. For example, if a New York City domiciliary created a trust with a trustee in a state that did not have income tax, and the trust contained income producing intangible assets, both state and city taxes could be avoided. See Randall W. Roth, "The Intentional Use of Tax -Defective Trusts," 1992 U. Miami 26th Inst. on Est. Plan, Ch 4.

Alternatively, if the trust situs is in a state that taxes trusts, whether as a result of a change of law or otherwise, the problem may still be fixable. A properly drafted Inheritor's Trust should contain powers to change the trust situs, in addition to the power to create subtrusts. Therefore, it may not only be possible, but beneficial to change the trust situs to a jurisdiction that does not tax trusts. Since it may be necessary to change the trustee as well, in order to obtain these benefits (as in the New York example above), the client may want to create a subtrust with the assets that would otherwise be subject to state income tax, and to transfer those assets to another jurisdiction, perhaps appointing another trustee, but retaining a local trustee (e.g., the beneficiary) for other assets not likely to generate taxable income.

6. Step-Up in Basis Opportunities Through Exercise of Powers of Appointment

If the grantor has a relatively small estate and is expected to have unused unified credit, the grantor might consider retaining a special power of appointment over the property in the trust, which would cause the trust to be taxable in the grantor's estate under Code Sec. 2038, resulting in a basis step-up. If the dispositive provisions of the Inheritor's Trust prohibit distributions without the consent of an adverse party, the trust would not be a grantor trust for income tax purposes (see IRS Letter Ruling 20148028). So, just as it is possible to have a grantor trust that is not in the grantor's estate, it is possible to have a non-grantor trust that is in the grantor's estate.

CONCLUSION: The Inheritor's Trust, in all its Varieties and with all its Uses, Should be the Centerpiece of the 21st Century Estate Planner's Tool Box

The Inheritor's Trust can assume many forms. Nevertheless, there are several characteristics that one would commonly expect to find in an Inheritor's Trust. First, and primary, the trust would be "beneficiary controlled" (the functional equivalent of outright ownership). Second, the trust would be changeable (re-write power). Third, the Trust would efficiently use any GST tax exemption allocated by the grantor. Fourth, the trust would be "dynastic," i.e., designed to last as long as the law permits. This perpetuity provision would, in addition, virtually always be coupled with liberal and creative powers of appointment (re-write powers). Fifth, income taxes would be memorialized through analysis and planning for who should be taxable on trust income. Sixth, the Independent Trustee (whose identity is controlled by the beneficiary) will usually be given a power to merge or terminate the trust, including the power to create subtrusts, perhaps with separate trustees and separate tax and investment objectives. Seventh, the Trust would provide protector against transfer taxes, ex-spouses and creditors.

Due to its protean nature, the Inheritor's Trust can be designed to solve just about any estate planning problem for families who are trying to preserve wealth without losing control and flexibility.

The Inheritor's Trust can achieve: (1) estate tax savings; (2) GST tax savings; (3) ordinary income tax savings by shifting the ordinary income to the individual or the trust that produces the lowest rate; (4) state income tax deferral or savings, by shifting the trust domicile to a state that does not tax trusts; (5) provisions that cause capital gains to be either unrealized, or stepped up to fair market value without recognition at all; (6) creditor/predator protection; and (7) last, but perhaps just as important, *the beneficiary of the Inheritor's Trust can use the trust to achieve virtually all of his or her personal non-tax estate planning objectives and needs* through access to trust funds through loans or rent-free use of trust property and through use of pervasive powers of appointment. The Inheritor's Trust can provide all of this, and more, while simultaneously reposing in the beneficiary virtually total control. Finally, and not to be overlooked, while the Inheritor's Trust is especially beneficial for the super-wealthy, it is also a worthwhile option for clients of moderate wealth, and their families.

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