

**FORM #16**

[Irrevocable Trust. Settlor is married. Designed to hold insurance on joint lives of settlor and spouse of settlor. *Crummey* powers. Contingent payment of taxes. Creates management-style trusts until stated ages.]

**IRREVOCABLE TRUST AGREEMENT**

Made October 20, 2004.

**ARTICLE I**

**Purpose**

I, EDWARD S. ZIEGLER, of Peoria, Illinois, transfer to MARY Q. ZIEGLER, of Peoria, Illinois, as Trustee, ten dollars and other consideration. The Trustee agrees to administer this property, together with any additions and changes, according to this instrument.

**ARTICLE II**

**Disposition Until Death of Survivor  
of My Wife and Me**

Until the death of the survivor of my wife and me, the Trustee shall administer the trust estate as provided in this Article.

Section 2.01. Lifetime Trust. The Trustee shall set the trust estate apart, in a separate trust to be known as the "Lifetime Trust" and to be administered as provided in this Section.

(A) Distributions. The Trustee shall pay to any one or more of my descendants, without any duty of equalization, so much or all, if any, of the trust estate as the Independent Trustee in its sole and absolute discretion determines to be advisable from time to time, considering or not considering resources otherwise available, for any purpose or reason whatsoever, including the termination of the trust.

(B) Right to Withdraw. Notwithstanding any other provision of this instrument, the Trustee shall pay to each person (the "donee") who is a descendant of mine so much or all, if any, of the trust estate as the donee has a right to withdraw according to paragraph (1) and directs in writing before the right lapses according to paragraph (3).

(1) Whenever any donor makes a contribution to the Trustee, each donee shall have the right to withdraw so much of the trust estate as has a value equal to (i) the value of the contribution to such extent as the contribution, if given outright to the donee and gifts were split to the maximum extent according to Section 2513(a) of the Code, would be excluded (according to Section 2503(b) of the Code) from taxable gifts for purposes of determining United States gift tax or, if less, (ii) the product of (I) the value of the contribution and (II) a fraction of which the numerator is the amount that is described in (i) with respect to the donee and of which the denominator is the aggregate of the amounts that are described in (i) with respect to all donees. Notwithstanding the preceding portion of this paragraph (1), the donor by direction delivered to the Trustee before or with any particular contribution may increase (to such extent as all rights to withdraw arising because of the contribution do not exceed the contribution) or decrease or eliminate any right to withdraw that, but for the direction, would arise because of the contribution.

(2) The property subject to the donee's right to withdraw shall be from such number of separate portions as there are contributions which empower the donee to withdraw some amount. Each separate portion shall consist of a particular contribution (and its proceeds but not any income or accretion), to such extent (if any) as the contribution empowers the donee (or, as the case may be, the donee and any one or more others) to withdraw. The donee shall have the right to withdraw from each portion the amount that the contribution to which the portion is attributable empowers the donee to withdraw; provided, no donee at any particular time shall have the right to withdraw from any property subject to withdrawal any amount greater than (i)(a) the amount (determined without regard to this

provisory clause) that the donee then can withdraw from the property divided by (b) the amount (determined without regard to this provisory clause) that all donees then can withdraw from the property, multiplied by (ii) the value of the property at such time.

(3) The donee's right to withdraw shall lapse only upon the first to occur of

(a) The donee's death; and

(b) To such extent as the right is attributable to a particular contribution and the lapse of the donee's right during the calendar year does not exceed the greater of (I) five thousand dollars and (II) five percent of the value at the time of lapse of the property from which the Trustee can satisfy the right, the end (or as soon as possible after the end) of the four hundred tenth day after the contribution is made; provided, this clause (b) shall apply (i) to each portion of a right (compared to each other portion) in the same sequence as the contribution to which the portion is attributable (compared to each other contribution), so that any lapse of the portion that is attributable to the particular contribution shall occur at such time and in such amount as if no gift were made after the particular contribution, and (ii) as if any right created according to another instrument were created according to this subsection (B).

Notwithstanding the preceding portion of this paragraph (3), the donor by direction delivered to the Trustee before or with any particular contribution may increase or decrease what, but for the direction, would be the duration of any right to withdraw that is attributable to the contribution.

(4) Upon the death of the survivor of my wife and me, the Trustee shall allocate to, and charge as an advancement against, any share (as of the time as of which the share is created) of the Family Trust that the Trustee then is to set apart with respect to the donee according to Section 4.01, to the extent of the share, the fair market value of any of the trust estate that, at the time as of which the share is set apart, the donee can withdraw.

(5) The Trustee shall notify the donee (and any person described in the next sentence) about all rights granted to the donee pursuant to this subsection (B). A person described in subsection (F) of Section 7.03 may exercise the rights for any legally incapacitated donee.

(C) Insurance. The Trustee may apply any of the trust estate to the payment of premiums on policies of insurance on my life, the life of my wife or each (or both) of our lives.

(D) Termination. Unless sooner terminated by distribution or expenditure according to the foregoing, the Lifetime Trust shall terminate upon the death of the survivor of my wife and me, and, subject to any remaining portion of any right to withdraw granted according to subsection (B) of this Section, the Trustee shall administer the trust estate of the Lifetime Trust according to the subsequent provisions of this instrument.

### ARTICLE III

#### Taxes

Section 3.01. Taxes. If any of the trust estate is included in my gross estate for purposes of determining the United States estate tax payable because of my death, the Trustee shall pay estate and inheritance taxes (including any interest and penalty) payable because of my death, in such amount, if any, as these items are increased because of inclusion of the trust estate in my estate for such death tax purposes. The Trustee shall make the payments directly or to my personal representative, without apportionment or reimbursement, from principal of the trust estate so included, as an expense of administration. Notwithstanding anything to the contrary, the Trustee shall not make any payment from any property that is excluded from my gross estate for purposes of determining the United States estate tax payable because of my death. If any of the trust estate is included in the gross estate of my wife for purposes of determining the United States estate tax payable because of the death of my wife, the Trustee shall pay estate and inheritance taxes (including any interest and penalty) payable because of the death of my wife, in such amount, if any, as the taxes are increased because of inclusion of the trust estate in the estate of my wife for such death tax purposes. The Trustee shall make the payments directly

or to the personal representative of my wife, without apportionment or reimbursement, from principal of the trust estate so included, as an expense of administration. Notwithstanding anything to the contrary, the Trustee shall not make any payment from any property that is excluded from the gross estate of my wife for purposes of determining the United States estate tax payable because of her death.

#### ARTICLE IV

#### Disposition Upon Death of Survivor of My Wife and Me

Upon the death of the survivor of my wife and me, the Trustee shall administer the trust estate as provided in this Article.

Section 4.01. Family Trust. The Trustee shall set apart, in a separate trust to be known as the “Family Trust” and to be administered as provided in this Section, the remainder of the trust estate (after satisfaction of all dispositions and payments under prior provisions of this instrument). Upon the death of the survivor of my wife and me, the Trustee shall divide the trust estate of the Family Trust into shares, and set the shares apart, on a per stirpital basis with respect to my descendants who then are living. Any share so set apart with respect to a descendant of mine shall be held in a separate trust, to be known as the “Family Trust” preceded by the name of the descendant and to be administered as provided in this Section. Any share inuring to a descendant of mine according to the last sentence of subsection (C) of this Section shall be held in a separate trust, to be known as the “Family Trust” preceded by the name of the descendant and to be administered as provided in this Section. Each trust is primarily for the benefit of the descendant with respect to whom the trust is created, and I would approve (but do not direct) the exercise of each power (determined as if this sentence did not exist) to the maximum extent in favor of the descendant. References to “the descendant” in succeeding provisions of this Section are references to my descendant with respect to whom the particular trust is created.

(A) Distributions. The Trustee shall pay to the descendant so much or all, if any, of the trust estate as the Trustee determines to be necessary or advisable from time to time, considering resources otherwise available, to provide for the descendant’s health, education and support in the manner of living to which accustomed. Additionally, the Trustee shall pay to the descendant so much or all, if any, of any balance of the trust estate as the Independent Trustee in its sole and absolute discretion determines to be advisable from time to time, considering or not considering resources otherwise available, for any purpose or reason whatsoever, including the termination of the trust.

(B) Right to Withdraw. The Trustee shall pay to the descendant so much or all, if any, of the trust estate as the descendant directs in writing at any time and from time to time after attaining twenty-five years of age, not before the descendant attains thirty years of age to exceed in value one-third, and not before the descendant attains thirty-five years of age to exceed in value two-thirds, of the value of the trust estate at the time as of which the right commences.

(C) Termination. Unless sooner terminated by distribution or expenditure according to the foregoing, the trust shall terminate upon the descendant’s death, and the Trustee shall distribute the trust estate of the trust to such one or more appointees, other than the estate, creditors and creditors of the estate of the descendant, in such amounts and portions and subject to such trusts, terms and conditions as the descendant may appoint by Will specifically referring to this power; provided, if the United States generation-skipping tax is in effect at the death of the descendant, the Trustee shall distribute the Appointive Portion additionally to such one or more members of a group consisting exclusively of the creditors and the estate and the creditors of the estate of the descendant in such amounts and portions and subject to such trusts, terms and conditions as the descendant may appoint by Will specifically referring to this power. Except to such extent (if any) as the Independent Trustee in its sole and absolute discretion has released this authority, the Independent Trustee in its sole and absolute discretion at any time and from time to time may revoke or restore all or any of the power granted according to the

provisory clause of the preceding sentence, by means of a signed instrument delivered before the death of the descendant to the descendant or (if the descendant is legally incapacitated) a person described in subsection (F) of Section 7.03. The Independent Trustee shall not have any responsibility for any exercise of, or any failure to exercise, any authority granted in the preceding sentence. The Appointive Portion is any of the trust estate of the trust with respect to which a generation-skipping transfer would occur upon the death of the descendant if the descendant did not possess any power of appointment. To such extent, if any, as the trust estate of the trust is not effectively appointed, the Trustee shall distribute the trust estate of the trust to the descendant's then living descendants, per stirpes, or, if no descendant of the descendant then is living, to the then living descendants, per stirpes, of the descendant's nearest ancestor who is I or a descendant of mine and of whom one or more descendants then are living; provided, any share thus inuring to a descendant of mine shall be held in a separate trust (then or previously created with respect to the descendant under this Section) to be administered as provided in this Section.

(D) Special Assets Family Trust. Notwithstanding the preceding portion of this Section, the Trustee shall set apart in (or, as the case may be, pay to) a separate trust, to be known as the "Special Assets Family Trust" preceded by the name of the descendant and to be identical to the Family Trust named for the descendant, except that the Trustee shall not pay any of the trust estate to other than the descendant during the life of the descendant and that subsection (A) of this Section shall not apply and instead the Trustee shall pay the net income to the descendant quarter-annually from and after such time (if any) as the Independent Trustee in its sole and absolute discretion determines and until such time (if any) as the Independent Trustee in its sole and absolute discretion determines but (if the Independent Trustee makes the former determination) at least until the end of the calendar year in which the Independent Trustee makes the latter determination, so much or all, if any, of the trust estate (or what absent this subsection (D) would be the trust estate) of the Family Trust named for the descendant as the Independent Trustee in its sole and absolute discretion determines to be advisable from time to time.

## ARTICLE V

### Additional Dispositive Provisions

Section 5.01. Distributions to Certain Persons. Property becoming payable to or for the benefit of a person who is under a minority or other legal disability or who is unable properly to manage it shall be paid in the discretion of the Trustee (i) directly to the person or (ii) to the guardian or conservator of the person's estate or (iii) to any custodian for the person under any applicable Uniform Gifts or Transfers to Minors Act or (iv) directly for the benefit of the person (including in reimbursement for amounts properly advanced for the person's benefit).

Section 5.02. Limitation of Duration. The rule against perpetuities does not and shall not, and (to the maximum extent possible) all other rules of law limiting the duration of trusts do not and shall not, apply to any trust that is created by this instrument or, directly or indirectly, by exercise of any power of appointment granted in this instrument. Without limiting the generality of the preceding sentence, the Trustee (or other person to whom the power properly is granted or delegated) has the power to sell, lease and mortgage property for any period of time beyond the period of the rule against perpetuities and (to the maximum extent possible) beyond the period of the limitation of all other rules of law limiting the duration of trusts. Each trust that is created by this instrument or, directly or indirectly, by exercise of any power of appointment granted in this instrument is a qualified perpetual trust (within the meaning of the Statute Concerning Perpetuities (765 ILCS 305)). Solely to such extent (if any) as, notwithstanding the preceding portion of this Section, applicable law limits the duration of any trust that is created by this instrument (or, directly or indirectly, by exercise of any power of appointment granted in this instrument) and that is not terminated before the end of the period of the limitation, the trust shall terminate at the end of the period of the limitation, and the Trustee shall