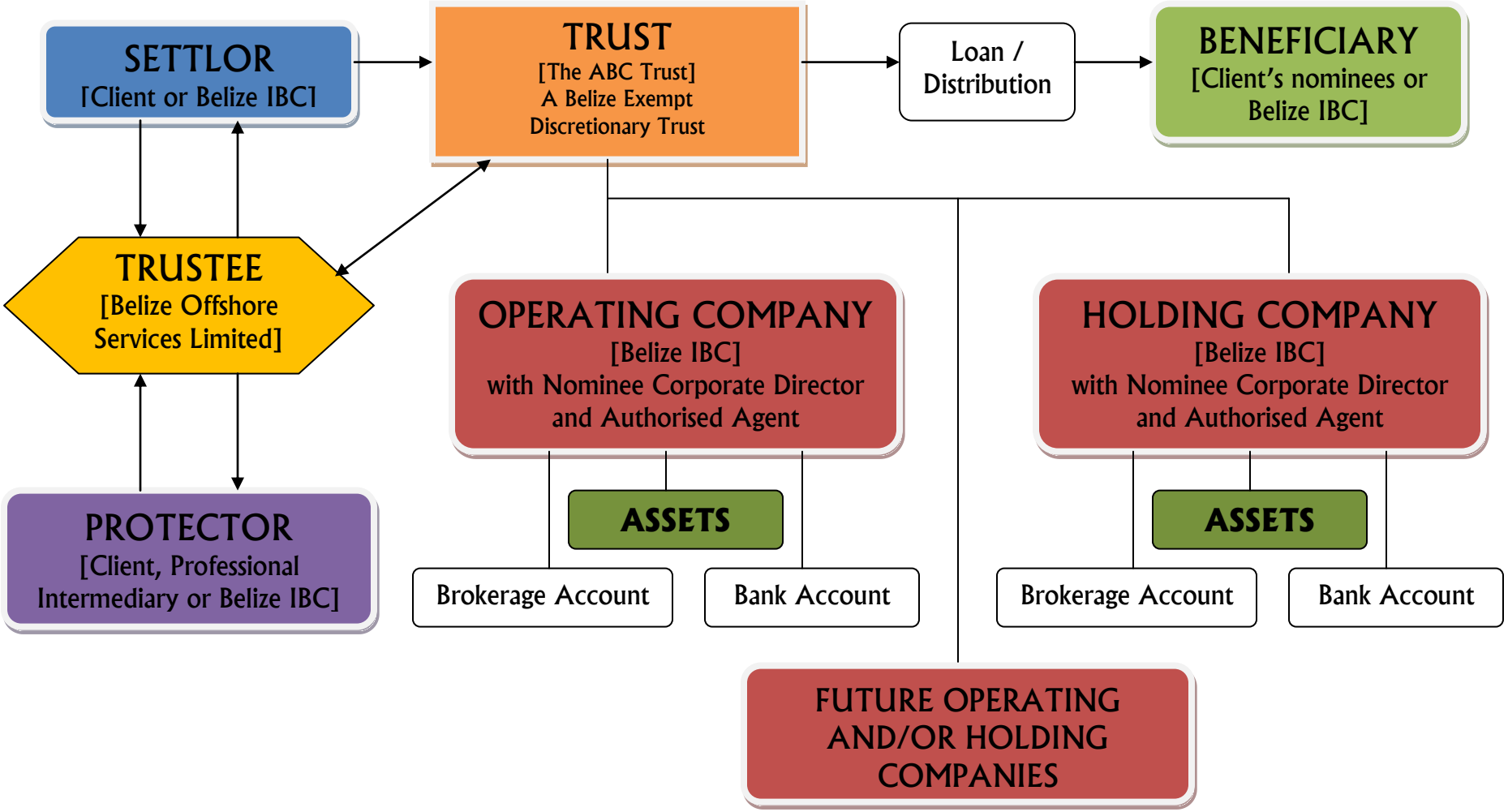SUGGESTED IBC / TRUST STRUCTURE