

THE RUST GROUP

The Rust Group is a partnership that has developed over the past 20 years in London, England and Austin, Texas. The Group's partners have a wide range of backgrounds and disciplines as well as extensive commercial experience in both Europe and the USA across several sectors including Property, Healthcare, Telecommunications, Renewable Energy and Conventional Energy.

The Partners can draw on their knowledge to provide clients with multi-disciplined business consultancy and advisory services.

The Rust Group can also assist with:

- Business Plans
- Information Memoranda
- Tax Efficient Company Structures
- Fund Raising
- Mergers & Acquisitions

The Group can also assist companies looking for an introduction to the Alternative Investment Market of the London Stock Exchange.

The Group has clients from a wide range of industries and backgrounds and has largely been introduced through personal recommendation.

THE TEAM

Jack Crosby

Jack has been an active venture capitalist and cable television pioneer and professional for over thirty years. He was a founder of the Austin based venture capital firm Austin Ventures and has been CEO of a variety of entertainment and media ventures including Orion Pictures and Imagine Films Entertainment.

Michael Woolley

Michael is a Chartered accountant and is primarily responsible for investment appraisals and corporate and tax structuring activities. Michael has specialist knowledge of international tax and financial reporting, and in that capacity has acted as an advisor to Moodys as well as the World Bank and other major banking organizations worldwide.

Michael Lehrter

Michael spent over a decade as a senior executive with Dell Inc. spearheading the development of their European business holding marketing and general management roles in the UK, South Africa and Emerging Markets territories. Michael splits his time between London and Austin and is now the lead partner in the Life Settlements Management business.

Adrian Loader

Adrian is a former Coutts banker and oversees the partnership's statutory and financial management functions. He has a particular knowledge of the real estate and hospitality industries but has considerable experience in the auto components and storage industries.

Ian Hazeel

Ian, a Chartered Secretary, worked for many years in the City of London in corporate finance and as a senior officer in the investment management sector. A co-founder of one of the UK's largest property finance broking companies and a consultant to venture capital groups, he is presently executive chairman of or an active director in a variety of companies.

Management of Off-Shore Life Settlements Structures



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The Life Settlement market is growing in popularity with investors across the world with most investment centering on US based life insurance products. The Rust Group uses its international management expertise and US and EU locations to offer a full range of support services to life settlement funds wishing to take advantage of “Off-Shore” management structures and their associated structural and tax benefits.

STRUCTURAL BENEFITS

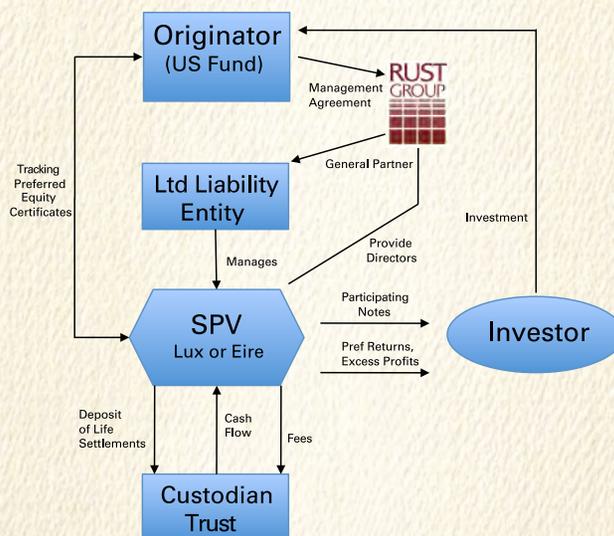
US based Life Settlement Portfolio investors may benefit significantly by domiciling the management of their portfolios off-shore in jurisdictions with double tax treaties with the USA. For example, funds that are using leverage for purchasing of Life Settlements may take advantage of favorable tax treatment of premium payments and other costs which can be aggregated across a portfolio to defer taxation to later stages of portfolio payout. In this way, in the early years of portfolio development, cash flows to investors and funds can be significantly enhanced.

The Rust Group works in partnership with advisors in the US and the EU that can advise investors and fund managers in the US on appropriate structures to maximize these benefits. In particular, tax treaties that currently exist between the

USA and Luxembourg and/or Ireland provide a framework to facilitate management and maximization of investor returns in Life Settlement Portfolios.

Careful structuring and management of entities to achieve these benefits is essential. The Rust Group can direct you to effective advisors in this area and can then assist in the setup and management of all structures required in European territories to manage and maintain tax effective treatment for Life Settlements portfolios.

TYPICAL OFFSHORE STRUCTURE



The Rust Group is currently engaged with several US based investors / fund managers to achieve these benefits and is actively managing a Life Settlements portfolio of over 270 policies through a series of UK and Luxembourg based companies. The Rust Group was fundamental in the creation of this structure and takes responsibility for all management and reporting necessary to ensure compliance with US / European double taxation treaties. Further details of these structures and procedures can be provided upon request.

VALUE ADDED SERVICES

Whilst normal domiciliation services are available through a number of sources and institutions in various European territories, few have specific experience relative to Life Settlements. In contrast, the Rust Group has assisted in developing and completing purchase of policies to make up the current portfolios under management and as such, has significant market specific knowledge and expertise. It is our belief that this specific expertise puts the Rust Group in an ideal position to customize the service required for a variety of situations whilst protecting the compliance with US / European double taxation treaties.

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