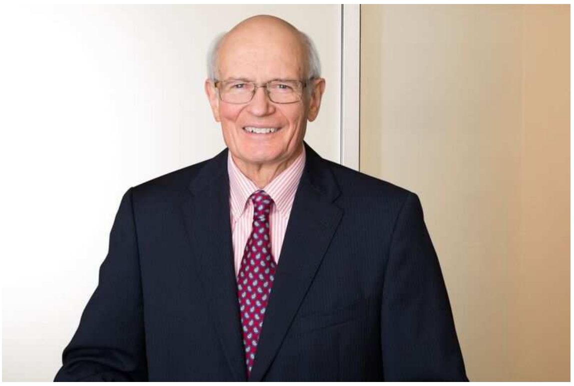

Livingston Wernecke

Of Counsel
206.268.8679
lwernecke@bpmlaw.com

PRACTICE AREAS

Estate Planning and Probate, Business and Corporate Law, Commercial Transactions, Real Estate and Taxation

OVERVIEW

Liv Wernecke is of counsel with more than 30 years' experience at Betts Patterson Mines, he heads the Estate Planning and Probate practice area and also is a member of the firm's Business Transactions Practice Group.

Mr. Wernecke's practice covers estate planning, succession planning for closely held business, real estate and investment entities, compensation and retirement arrangements, probate, trust creation and administration, individual, estate and entity taxation, guardianships, and certain aspects of international trade.

He was co-counsel of a successful Washington Supreme Court case upholding the application of the equal protection clause to state taxes and has lectured at Golden Gate University in taxation of S Corporations, partnerships and estates.

REPRESENTATIVE TRANSACTIONS

Estate plans drafted for

- Couple requiring minimal language in federally taxable estate
- Couple with federally taxable estate composed of illiquid encumbered real property
- Couple with federally taxable estate largely in Individual Retirement Accounts
- Couple with federally taxable Estate using grantor retained annuity trusts and qualified personal residence trusts
- Couple requiring gifts in closely held business ownerships
- Beneficiary of a taxable trust and a difficult business/trust arrangement

Estate/Trust administration

- Deceased spouse with JTWROS accounts, real estate and disclaimers to reduce survivor's estate
- Substantial charitable bequests distributed in several months
- Deceased spouse with disclaimer to reduce estate taxes
- Estate requiring real property sales for distribution
- Assist attorneys with probate litigation and dispute resolution

Business Entities

- Draft Buy-Sell Agreement
- Draft Buy-Sell Agreement for elderly shareholders
- Draft private foundation documents
- Draft limited liability agreements for business succession

Real Property (often in trusts or Estates)

- Prepare sale and security documents for commercial buildings
- Assist with clean up and sale of contaminated properties

Taxation

- Change large IRS estate tax claim in to equally large refund on real estate sold during estate administration
- Dealt with IRS retirement plan claims
- Dealt with audit on real estate values

EDUCATION

New York University, LL.M. in Taxation, 1973
University of Washington, J.D., 1972
University of Washington, B.A., 1965

ADMISSIONS

Washington State Bar, 1973
United States District Court, Western District of Washington
United States Court of Appeals, Ninth Circuit
United States Supreme Court
United States Tax Court
United States Court of International Trade

PROFESSIONAL RECOGNITION

AV®, Peer Review Rated by Martindale-Hubbell
Washington Law & Politics, “Super Lawyers” (2003, 2005-7, 2010 & 2013)
Seattle Met Magazine, "Top Lawyers", Estate Planning Practice Area (2010)
‘Top Attorney’ in *Washington CEO*, “Top Washington 2007"
Washington CEO, "League of Justice" (2006)

PROFESSIONAL & CIVIC AFFILIATIONS

American Bar Association
Washington State Bar Association
  Member, Real Property, Probate and Trust Section
  Member, Taxation Law Section
  Member, Estate and Gift Tax Committee
King County Bar Association
Estate Planning Council of Seattle

He served in Vietnam in 1966-1967 as an Army officer.