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December 12, 2011

Mr. John Carlson
Principal Administrator
2, rue Andre-Pascal
75775 Paris Cedex 16
France

Re: ACTEC Comments following the FATF Consultative Forum
Meeting in Milan, December 5 and 6, 2011

Dear Mr. Carlson,

On behalf of The American College of Trust and Estate Counsel ("ACTEC"), we are responding to FATF's request for comments following the Consultative Forum meeting in Milan on December 5th and 6th, 2011. Rather than submit separate comments, ACTEC adopts, endorses, and supports the position taken by STEP in its follow-up letter to the FATF on Interpretive Notes to Recommendation 5 and Recommendation 34 dated September 12, 2011.

ACTEC is a national professional association of approximately 2,600 lawyers elected to membership by their peers on the basis of professional reputation and ability in the field of trusts and estates and on the basis of having made substantial contributions to these fields through lecturing, writing, teaching, and bar activities. Fellows of ACTEC have extensive experience in rendering advice to taxpayers on matters of federal taxes, with a focus on estate and gift tax planning and compliance. ACTEC offers technical comments about the law and its effective administration, but does not take positions on matters of policy or political objectives.

Principal responsibility for preparation of these comments was exercised by Duncan E. Osborne, of Osborne, Helman, Knebel & Deleery LLP in Austin, Texas (512) 542-2010, Leigh-Alexandra Basha, of Holland & Knight LLP in McLean, Virginia (703) 720-8081, Robert C. Lawrence III of Cadwalader, Wickersham & Taft LLP in New York, New York (212) 504-6211, and Henry Christensen, III of McDermott, Will & Emery in New York, New York (212) 547-5658. Members of your staff may contact any of them for more information regarding these comments.

Sincerely,

Mary F. Radford
ACTEC President