

CERTIFICATE OF INDEPENDENT REVIEW

I, _____(attorney's name), have reviewed the
_____ (name of instrument), and counseled my client,
_____ (name of client), on the nature of the transfer, or transfers,
of property to _____ (name of potentially disqualified person)
contained in the instrument. I am so disassociated from the interest of the transferee as to be in a
position to advise my client impartially and confidentially as to the consequences of the transfer. On
the basis of this counsel, I conclude that the transfer, or transfers, in the instrument that otherwise
might be invalid under Section 21350 of the Probate Code are valid because such transfer, or
transfers, are not the product of fraud, menace, duress, or undue influence.

(Name of Attorney)

(Date)