

USING FINANCIAL MODELING TO EXPLAIN THE ESTATE TAX BENEFITS OF A PLANNING TECHNIQUE AND EVALUATE THE GRANTOR'S OBLIGATION TO PAY



APRIL 13
11 AM - 12 PM



BRANDON KETRON



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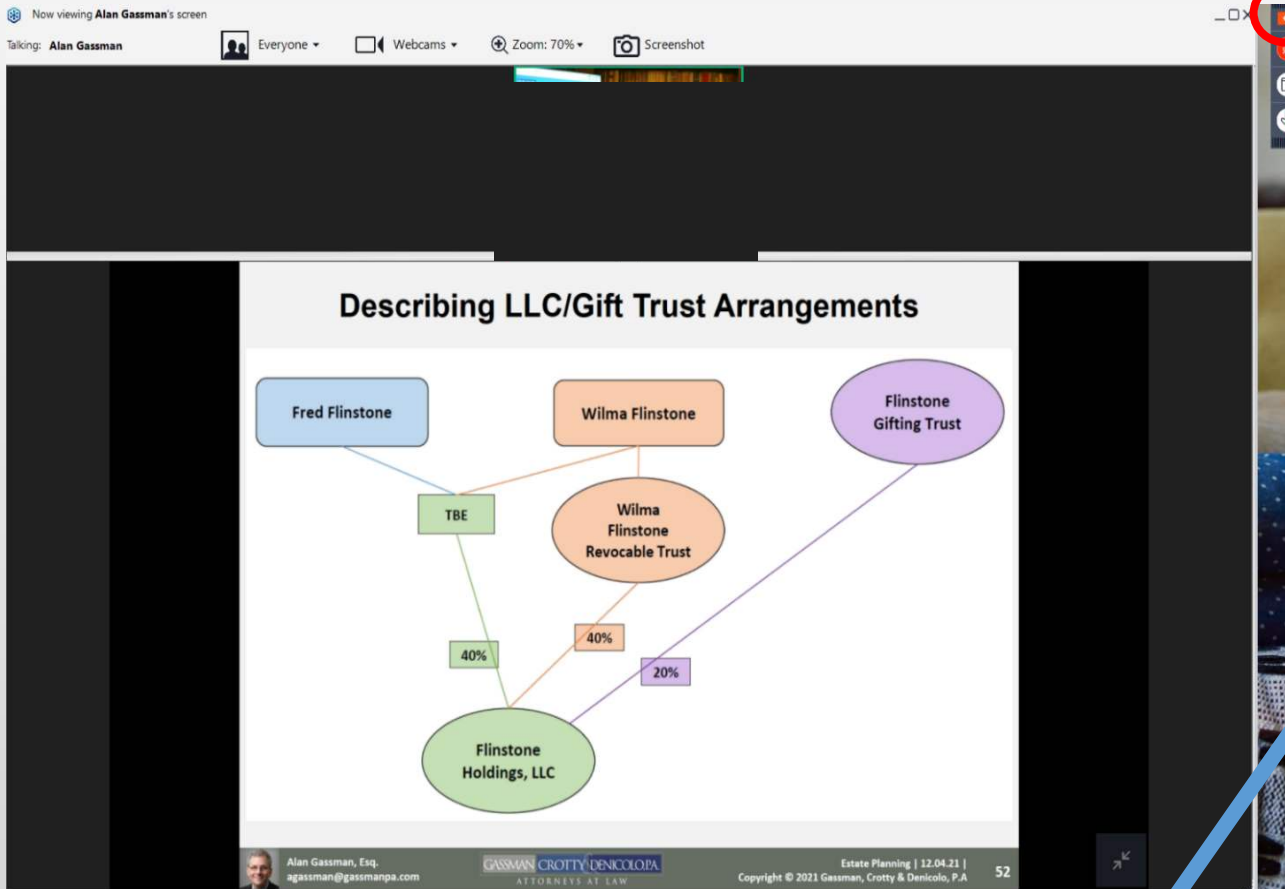
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Tools and Strategies to Avoid Estate Planning Tragedies - Part II Saturday, June 11, 2022 From 11:00 AM to 12:00 PM EDT (60 minutes) Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 59:52	Regulation - What To Do Now And Demystification Plus Other Hot Topics Thursday, April 28, 2022 10:00 to 10:30 AM EDT (30 minutes) Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 1:02:39	The Mathematics of Estate Tax Planning Saturday, May 14, 2022 From 11:00 AM to 12:00 PM EDT (60 minutes) Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 1:08:06	The New Florida SLAT Law Friday, May 21, 2022 From 11:00 AM to 12:00 PM EDT (60 minutes) Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 36:54	Tools and Strategies to Avoid Estate Planning Tragedies Saturday, May 14, 2022 From 11:00 AM to 12:00 PM EDT (60 minutes) Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 1:04:40	Part 2 Estate Tax Planning For The Wealthy - What You Need To Know Saturday, May 7, 2022 From 11:00 AM to 12:00 PM EDT (60 minutes) Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 1:02:02
Tools and Strategies to Avoid Estate Planning Tragedies... Alan Gassman 523 views • 1 year ago	IRS Proposed Clawback Regulation - What To Do No... Alan Gassman 272 views • 1 year ago	THE MATHEMATICS OF ESTATE TAX PLANNING Alan Gassman 657 views • 1 year ago	THE NEW FLORIDA SLAT LAW Alan Gassman 392 views • 1 year ago	Tools and Strategies to Avoid Estate Planning Tragedies -... Alan Gassman 574 views • 1 year ago	Part 2 Estate Tax Planning For The Wealthy Alan Gassman 249 views • 1 year ago

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PLANIFICACION PATRIMONIAL PARA FAMILIAS LATINOAMERICANAS Presented by: Luis A. Silva, Esq., Estates & Trusts Practice Group 26:37	Estate Planning For The Korean American Family Presented by: Andy Whang, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 46:35	THE LATIN AMERICAN CLIENT Monday, June 20, 2022 From 12:00 PM to 12:30 PM ET (30 minutes or More) Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 34:28	Jewish Families Thursday, June 9th 2022 3:00 PM ET (60-Minutes) Presented by: Shoshana (Shosh) Mower, Esq., and Special Guest Rabbi Ari Margulies Moderated by: Alan Gassman, Esq. 47:57	WHAT ESTATE PLANNERS NEED TO KNOW ABOUT AFRICAN AMERICAN FUNERALS Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 54:56	WHAT ESTATE PLANNERS NEED TO KNOW ABOUT JEWISH FUNERALS Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 26:24
PLANIFICACION PATRIMONIAL PARA... Alan Gassman 38 views • 1 year ago	Andy Cho: Estate Planning For The Korean American... Alan Gassman 182 views • 1 year ago	Estate Planning for the Latin American Family Alan Gassman 75 views • 1 year ago	Planning For Orthodox Jewish Families Alan Gassman 438 views • 1 year ago	What Estate Planners Need To Know About African... Alan Gassman 48 views • 1 year ago	What Estate Planners Need To Know About Jewish... Alan Gassman 81 views • 1 year ago

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Blow Forms 1065 (and 1120-S) Out of Orbit 1:05:55	PCF Social Justice Fund Activating Trust-Based... Presented by: Alan Gassman, Esq., LL.M. (Tax/Trust), AEP (Estate Planning) 41:09	Don Bryan: The Biggest Mistakes Ventriloquists Make Don (Gaylord) Bryan, THE BIGGEST MISTAKE INVENTOR MAKE 1:00:18	PASSING ON THE FAMILY BUSINESS TO KEY EMPLOYEES By: Jerry Hesch Saturday, May 7, 2022 1:00 to 2:00 PM EDT (60 minutes) 1:01:22	Human Aspects of Estate Planning PART 2 By: Martin M. Shenkman, Esq. 33:46	Human Aspects of Estate Planning By: Martin M. Shenkman, Esq. 30:07
Schedule K-2 and K-3 Blow Forms 1120-S and 1065 Out... Alan Gassman 1.2K views • 1 year ago	PCF Social Justice Fund Activating Trust-Based... Alan Gassman 40 views • 1 year ago	Don Bryan: The Biggest Mistakes Ventriloquists Make Alan Gassman 191 views • 1 year ago	Jerry Hesch: Passing On The Family Business To A Key... Alan Gassman 127 views • 1 year ago	Marty Shenkman: PART 2 Human Aspects Of Estate... Alan Gassman 104 views • 1 year ago	Marty Shenkman: Human Aspects of Estate Planning... Alan Gassman 213 views • 1 year ago

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Using Financial Modeling to Explain the Estate Tax Benefits of
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Illustrations Provided Using EstateView Planning Software

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Introduction

- When discussing estate planning strategies with clients, it is imperative to discuss the benefits of planning versus not planning. Sometimes the benefits can be showcased with an easy example or two, as when discussing the use of the lifetime exemption to make taxable gifts with no gift taxes.
- In addition to explaining the gift and estate tax benefits of a proposed planning technique, another objective of financial modeling is to communicate these tax benefits in an understandable manner.
- The first example covered is a gift of an income-producing asset to a grantor trust. Even a gift to a grantor trust can be confusing because the grantor has to pay the income taxes on the grantor trust's income.



Brandon Ketron, Esq.
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The Four Factors Designed To Shift Value To A Trust That Is Not Exposed To The Estate Tax Without Having to Use The Gift Or Estate Exemptions

1. Valuation discounts.
 2. Financial leverage.
 3. Freeze current value.
 4. Using grantor trusts (**the “burn”**).
 5. Secondary objective: Step-up in basis at death.
- **Example:** Value of Senior’s asset is \$1,000,000. Discounted value is \$800,000. Senior sells the discounted asset to a grantor trust for an \$800,000 promissory note at 4.0% annual interest, or \$32,000 each year. The \$1,000,000 asset generates \$60,000 of annual income. After paying the \$32,000 of note interest, the grantor trust nets \$28,000. At a 40% income tax rate, the income taxes on \$60,000 are \$24,000. Because the grantor has to pay the income taxes on the \$60,000 of income, the grantor depletes his retained assets by \$24,000. Therefore, the aggregate wealth shift is **\$52,000** (\$28,000 net in trust + \$24,000 depletion of grantor’s remaining assets) each year.
 - If the sale was to a non-grantor trust, the trust would receive \$60,000 of income, deduct its \$32,000 interest payment, paid \$11,200 of income taxes on \$28,000 of income and would netted after its interest payment and income tax payment only **\$16,800**. Instead, as a grantor trust, the trust netted \$28,000.



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Financial Modeling Not Only Explains How The Gift In Trust Works In An Understandable Manner, But Also can be used To Have The Client Actively Participate In the Design of A Proposed Strategy.

- Clients want to know “the hard numbers” in order to gauge whether moving forward with a particular strategy makes financial and emotional sense.
- Imagine explaining how the four factors that shift wealth work together using the installment sale to a grantor trust without having a spreadsheet illustrating the numbers on a page in front of them. It can be difficult and confusing, but when there are numbers on a page, strategies often come alive.



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Modeling Strategies Not Only Provides Tangible Numerical Data For Clients, But Also Provides Insights Into How The Proposed Strategies Work. Financial Modeling Highlights Those Insights And Provides A Vehicle To Help Their Clients Make Better Decisions Around Their Planning, Ones That Align More Closely With Their Personal Needs And Their Financial Goals.

- An often overlooked concern is the financial impact on the grantor's retained assets of grantor trust treatment for income tax purposes. As time goes by, the grantor is often concerned with the obligation to continue to pay the income taxes on the grantor trust's income.
- When we illustrate the gift to a grantor trust, and later the installment sale to a grantor trust, you need to consider **"how to minimize the impact of the grantor having to pay the income taxes on the grantor trust's income."**
- As the financial illustrations demonstrate, the financial impact of the "burn" compounds and increases over time. .
- Using financial modeling allows one to address alternatives to consider that reduce the burn.
- A list of those alternatives is provided later in these materials.



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Illustrating the “Burn”

Assume the following facts:

Senior, age 70 and single, currently has \$20,000,000 of income producing investment assets. This year Senior spent \$500,000 of his investment income for personal living expenses in addition to spending the income from social security and his pension plan. It is estimated that his person living expenses will increase 3% each year.

Assume an effective 30% Federal and state income tax rate for a combination of capital gains and ordinary income.

Senior wants to make a gift to a trust for the benefit of his children and asks how much he can give away given the above assumptions. The gift tax exemption for 2024 is \$13,610,000.

For purposes of the illustrations, assume a conservative rate of return of 5% on Senior’s investment assets.

Financial modeling allows the planner to consider the depletion of the grantor’s retained assets by: (1) the grantor paying the income taxes on the grantor trust’s income and (2) the amounts the grantor spends on personal living expenses.

Each of the following gift examples is designed to illustrate the point in time when these two wealth depletion factors exhaust all of the grantor’s retained assets while the grantor is still alive. In the first example, the grantor gifts \$10,000,000 and retains \$10,000,000. The exhaustion of Senior’s retained assets occurs at age 86. Knowing this, one can gift less of the \$20,000,000 and retain more of the \$20,000,000



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Illustrating the “Burn” – Scenario One

Gift of \$10,000,000

- In the first year, Senior received \$500,000 of income from the retained \$10,000,000 of assets, and paid \$150,000 of taxes on that income. After paying \$150,000 of taxes on the Trust’s income and spending \$500,000 on personal consumption, Senior had to invade \$300,000 of his retained \$10,000,000.
- The payment of the income taxes by Senior on his income and the Trust’s income (the “burn”) and Senior’s personal consumption totals \$800,000, and that amount exceeds Senior’s \$500,000 of income from his retained investments.
- If Senior survives past the age of 86, he will run out of assets. The probability of survival column in the spreadsheet shows that the probability of Senior age 70, surviving to age 86 is 44%.



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Jerry Hesch, Esq.

Illustrating the “Burn” – Scenario One

Gift of \$10,000,000, leaving Senior with \$10,000,000

Year #	Grantor Age	Prob Survival Through Year	Year One Gift	Grantor's Income Before Taxes	Income Taxes on Grantor's Income	Net Income (After Taxes)	Income Tax (Burn) on Trust Income	Annual Savings / (Spending)	End of Year Investments Value	Beginning Trust Value	Trust Growth	Income Tax on Trust Income	End Trust Value
0	70	100.00%	\$0	\$0	\$0	\$0	\$0	\$0	\$20,000,000	\$0	\$0	\$0	\$0
0	70	100.00%	\$10,000,000	\$0	\$0	\$0	\$0	\$0	\$10,000,000	\$0	\$0	\$0	\$10,000,000
1	71	95.95%	\$0	\$500,000	(\$150,000)	\$350,000	(\$150,000)	(\$500,000)	\$9,700,000	\$10,000,000	\$500,000	\$0	\$10,500,000
2	72	93.70%	\$0	\$485,000	(\$145,500)	\$339,500	(\$157,500)	(\$515,000)	\$9,367,000	\$10,500,000	\$525,000	\$0	\$11,025,000
3	73	91.30%	\$0	\$468,350	(\$140,505)	\$327,845	(\$165,375)	(\$530,450)	\$8,999,020	\$11,025,000	\$551,250	\$0	\$11,576,250
4	74	88.73%	\$0	\$449,951	(\$134,985)	\$314,966	(\$173,644)	(\$546,364)	\$8,593,978	\$11,576,250	\$578,813	\$0	\$12,155,063
5	75	86.00%	\$0	\$429,699	(\$128,910)	\$300,789	(\$182,326)	(\$562,754)	\$8,149,687	\$12,155,063	\$607,753	\$0	\$12,762,816
6	76	83.09%	\$0	\$407,484	(\$122,245)	\$285,239	(\$191,442)	(\$579,637)	\$7,663,847	\$12,762,816	\$638,141	\$0	\$13,400,956
7	77	80.00%	\$0	\$383,192	(\$114,958)	\$268,235	(\$201,014)	(\$597,026)	\$7,134,041	\$13,400,956	\$670,048	\$0	\$14,071,004
8	78	76.70%	\$0	\$356,702	(\$107,011)	\$249,691	(\$211,065)	(\$614,937)	\$6,557,731	\$14,071,004	\$703,550	\$0	\$14,774,554
9	79	73.22%	\$0	\$327,887	(\$98,366)	\$229,521	(\$221,618)	(\$633,385)	\$5,932,248	\$14,774,554	\$738,728	\$0	\$15,513,282
10	80	69.54%	\$0	\$296,612	(\$88,984)	\$207,629	(\$232,699)	(\$652,387)	\$5,254,791	\$15,513,282	\$775,664	\$0	\$16,288,946
11	81	65.68%	\$0	\$262,740	(\$78,822)	\$183,918	(\$244,334)	(\$671,958)	\$4,522,416	\$16,288,946	\$814,447	\$0	\$17,103,394
12	82	61.65%	\$0	\$226,121	(\$67,836)	\$158,285	(\$256,551)	(\$692,117)	\$3,732,033	\$17,103,394	\$855,170	\$0	\$17,958,563
13	83	57.48%	\$0	\$186,602	(\$55,980)	\$130,621	(\$269,378)	(\$712,880)	\$2,880,395	\$17,958,563	\$897,928	\$0	\$18,856,491
14	84	53.11%	\$0	\$144,020	(\$43,206)	\$100,814	(\$282,847)	(\$734,267)	\$1,964,095	\$18,856,491	\$942,825	\$0	\$19,799,316
15	85	48.61%	\$0	\$98,205	(\$29,461)	\$68,743	(\$296,990)	(\$756,295)	\$979,553	\$19,799,316	\$989,966	\$0	\$20,789,282
16	86	44.02%	\$0	\$48,978	(\$14,693)	\$34,284	(\$311,839)	(\$778,984)	(\$76,985)	\$20,789,282	\$1,039,464	\$0	\$21,828,746
17	87	39.38%	\$0	(\$3,849)	\$1,155	(\$2,694)	(\$327,431)	(\$802,353)	(\$1,209,464)	\$21,828,746	\$1,091,437	\$0	\$22,920,183
18	88	34.77%	\$0	(\$60,473)	\$18,142	(\$42,331)	(\$343,803)	(\$826,424)	(\$2,422,022)	\$22,920,183	\$1,146,009	\$0	\$24,066,192
19	89	30.26%	\$0	(\$121,101)	\$36,330	(\$84,771)	(\$360,993)	(\$851,217)	(\$3,719,002)	\$24,066,192	\$1,203,310	\$0	\$25,269,502
20	90	25.91%	\$0	(\$185,950)	\$55,785	(\$130,165)	(\$379,043)	(\$876,753)	(\$5,104,963)	\$25,269,502	\$1,263,475	\$0	\$26,532,977
21	91	21.80%	\$0	(\$255,248)	\$76,574	(\$178,674)	(\$397,995)	(\$903,056)	(\$6,584,687)	\$26,532,977	\$1,326,649	\$0	\$27,859,626
22	92	18.00%	\$0	(\$329,234)	\$98,770	(\$230,464)	(\$417,894)	(\$930,147)	(\$8,163,192)	\$27,859,626	\$1,392,981	\$0	\$29,252,607
23	93	14.56%	\$0	(\$408,160)	\$122,448	(\$285,712)	(\$438,789)	(\$958,052)	(\$9,845,745)	\$29,252,607	\$1,462,630	\$0	\$30,715,238
24	94	11.51%	\$0	(\$492,287)	\$147,686	(\$344,601)	(\$460,729)	(\$986,793)	(\$11,637,868)	\$30,715,238	\$1,535,762	\$0	\$32,250,999
25	95	8.89%	\$0	(\$581,893)	\$174,568	(\$407,325)	(\$483,765)	(\$1,016,397)	(\$13,545,355)	\$32,250,999	\$1,612,550	\$0	\$33,863,549



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Illustrating the “Burn” on the grantor – Scenario One

Gift of \$10,000,000, leaving Senior with \$10,000,000

Year #	Grantor Age	Prob Survival Through Year	Year One Gift	Grantor's Income Before Taxes	Income Taxes on Grantor's Income	Net Income (After Taxes)	Income Tax (Burn) on Trust Income	Annual Savings / (Spending)	End of Year Investments Value
0	70	100.00%	\$10,000,000	\$0	\$0	\$0	\$0	\$0	\$20,000,000
0	70	100.00%	\$10,000,000	\$0	\$0	\$0	\$0	\$0	\$10,000,000
1	71	95.95%	\$10,000,000	\$500,000	(\$150,000)	\$350,000	(\$150,000)	(\$500,000)	\$9,700,000
2	72	93.70%	\$10,000,000	\$485,000	(\$145,500)	\$339,500	(\$157,500)	(\$515,000)	\$9,367,000
3	73	91.30%	\$10,000,000	\$468,350	(\$140,505)	\$327,845	(\$165,375)	(\$530,450)	\$8,999,020
4	74	88.73%	\$10,000,000	\$449,951	(\$134,985)	\$314,966	(\$173,644)	(\$546,364)	\$8,593,978
5	75	86.00%	\$10,000,000	\$429,699	(\$128,910)	\$300,789	(\$182,326)	(\$562,754)	\$8,149,687
6	76	83.09%	\$10,000,000	\$407,484	(\$122,245)	\$285,239	(\$191,442)	(\$579,637)	\$7,663,847
7	77	80.00%	\$10,000,000	\$383,192	(\$114,958)	\$268,235	(\$201,014)	(\$597,026)	\$7,134,041
8	78	76.70%	\$10,000,000	\$356,702	(\$107,011)	\$249,691	(\$211,065)	(\$614,937)	\$6,557,731
9	79	73.22%	\$10,000,000	\$327,887	(\$98,366)	\$229,521	(\$221,618)	(\$633,385)	\$5,932,248
10	80	69.54%	\$10,000,000	\$296,612	(\$88,984)	\$207,629	(\$232,699)	(\$652,387)	\$5,254,791
11	81	65.68%	\$10,000,000	\$262,740	(\$78,822)	\$183,918	(\$244,334)	(\$671,958)	\$4,522,416
12	82	61.65%	\$10,000,000	\$226,121	(\$67,836)	\$158,285	(\$256,551)	(\$692,117)	\$3,732,033
13	83	57.48%	\$10,000,000	\$186,602	(\$55,980)	\$130,621	(\$269,378)	(\$712,880)	\$2,880,395
14	84	53.11%	\$10,000,000	\$144,020	(\$43,206)	\$100,814	(\$282,847)	(\$734,267)	\$1,964,095
15	85	48.61%	\$10,000,000	\$98,205	(\$29,461)	\$68,743	(\$296,990)	(\$756,295)	\$979,553
16	86	44.02%	\$10,000,000	\$48,978	(\$14,693)	\$34,284	(\$311,839)	(\$778,984)	-\$76,985
17	87	39.38%	\$10,000,000				(\$327,431)	(\$802,353)	-\$1,209,464
18	88	34.77%	\$10,000,000				(\$343,803)	(\$826,424)	-\$2,422,022
19	89	30.26%	\$10,000,000				(\$360,993)	(\$851,217)	-\$3,719,002
20	90	25.91%	\$10,000,000				(\$379,043)	(\$876,753)	-\$5,104,963
21	91	21.80%	\$10,000,000				(\$397,995)	(\$903,056)	-\$6,584,687
22	92	18.00%	\$10,000,000				(\$417,894)	(\$930,147)	-\$8,163,192
23	93	14.56%	\$10,000,000				(\$438,789)	(\$958,052)	-\$9,845,745
24	94	11.51%	\$10,000,000				(\$460,729)	(\$986,793)	-\$11,637,868
25	95	8.89%	\$10,000,000				(\$483,765)	(\$1,016,397)	-\$13,545,355



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Illustrating the wealth shift to the grantor trust – Scenario One

Gift of \$10,000,000, leaving Senior with \$10,000,000

Year #	Beginning Trust Value	Trust Growth	Income Tax on Trust Income	End Trust Value	Estate Tax Savings
0	\$0	\$0	\$0	\$0	
0	\$0	\$0	\$0	\$10,000,000	\$0
1	\$10,000,000	\$500,000	\$0	\$10,500,000	\$200,000
2	\$10,500,000	\$525,000	\$0	\$11,025,000	\$410,000
3	\$11,025,000	\$551,250	\$0	\$11,576,250	\$630,500
4	\$11,576,250	\$578,813	\$0	\$12,155,063	\$862,025
5	\$12,155,063	\$607,753	\$0	\$12,762,816	\$1,105,126
6	\$12,762,816	\$638,141	\$0	\$13,400,956	\$1,360,383
7	\$13,400,956	\$670,048	\$0	\$14,071,004	\$1,628,402
8	\$14,071,004	\$703,550	\$0	\$14,774,554	\$1,909,822
9	\$14,774,554	\$738,728	\$0	\$15,513,282	\$2,205,313
10	\$15,513,282	\$775,664	\$0	\$16,288,946	\$2,515,579
11	\$16,288,946	\$814,447	\$0	\$17,103,394	\$2,841,357
12	\$17,103,394	\$855,170	\$0	\$17,958,563	\$3,183,425
13	\$17,958,563	\$897,928	\$0	\$18,856,491	\$3,542,597
14	\$18,856,491	\$942,825	\$0	\$19,799,316	\$3,919,726
15	\$19,799,316	\$989,966	\$0	\$20,789,282	\$4,315,713
16	\$20,789,282	\$1,039,464	\$0	\$21,828,746	\$4,731,498
17	\$21,828,746	\$1,091,437	\$0	\$22,920,183	\$5,168,073
18	\$22,920,183	\$1,146,009	\$0	\$24,066,192	\$5,626,477
19	\$24,066,192	\$1,203,310	\$0	\$25,269,502	\$6,107,801
20	\$25,269,502	\$1,263,475	\$0	\$26,532,977	\$6,613,191
21	\$26,532,977	\$1,326,649	\$0	\$27,859,626	\$7,143,850
22	\$27,859,626	\$1,392,981	\$0	\$29,252,607	\$7,701,043
23	\$29,252,607	\$1,462,630	\$0	\$30,715,238	\$8,286,095
24	\$30,715,238	\$1,535,762	\$0	\$32,250,999	\$8,900,400
25	\$32,250,999	\$1,612,550	\$0	\$33,863,549	\$9,545,420



Brandon Ketron, Esq.
Jerry Hesck, Esq.

Although it seemed intuitive to maximize the gift tax exemption when advising the client, the illustrations demonstrate that to maximize the gift tax exemption, Senior would need more than the existing \$20,000,000 of investment assets

- The next example demonstrates the impact of the wealth depletion factors if Senior gifted \$6,000,000 of assets and retained \$14,000,000 of Senior's income-producing assets. In this situation, Senior's retained assets are exhausted if Senior is living at age 95.



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Illustrating the “Burn” – Scenario Two

Gift of \$6,000,000, Leaving Senior with \$14,000,000 to Age 95

Year #	Grantor Age	Prob Survival Through Year	Year One Gift	Grantor's Income Before Taxes	Income Taxes on Grantor's Income	Net Income (After Taxes)	Income Tax (Burn) on Trust Income	Annual Savings / (Spending)	End of Year Investments Value	Beginning Trust Value	Trust Growth	Income Tax on Trust Income	End Trust Value
0	70	100.00%	\$0	\$0	\$0	\$0	\$0	\$0	\$20,000,000	\$0	\$0	\$0	\$0
0	70	100.00%	\$6,000,000	\$0	\$0	\$0	\$0	\$0	\$14,000,000	\$0	\$0	\$0	\$6,000,000
1	71	95.95%	\$0	\$700,000	(\$210,000)	\$490,000	(\$90,000)	(\$500,000)	\$13,900,000	\$6,000,000	\$300,000	\$0	\$6,300,000
2	72	93.70%	\$0	\$695,000	(\$208,500)	\$486,500	(\$94,500)	(\$515,000)	\$13,777,000	\$6,300,000	\$315,000	\$0	\$6,615,000
3	73	91.30%	\$0	\$688,850	(\$206,655)	\$482,195	(\$99,225)	(\$530,450)	\$13,629,520	\$6,615,000	\$330,750	\$0	\$6,945,750
4	74	88.73%	\$0	\$681,476	(\$204,443)	\$477,033	(\$104,186)	(\$546,364)	\$13,456,003	\$6,945,750	\$347,288	\$0	\$7,293,038
5	75	86.00%	\$0	\$672,800	(\$201,840)	\$470,960	(\$109,396)	(\$562,754)	\$13,254,814	\$7,293,038	\$364,652	\$0	\$7,657,689
6	76	83.09%	\$0	\$662,741	(\$198,822)	\$463,918	(\$114,865)	(\$579,637)	\$13,024,230	\$7,657,689	\$382,884	\$0	\$8,040,574
7	77	80.00%	\$0	\$651,211	(\$195,363)	\$455,848	(\$120,609)	(\$597,026)	\$12,762,443	\$8,040,574	\$402,029	\$0	\$8,442,603
8	78	76.70%	\$0	\$638,122	(\$191,437)	\$446,686	(\$126,639)	(\$614,937)	\$12,467,553	\$8,442,603	\$422,130	\$0	\$8,864,733
9	79	73.22%	\$0	\$623,378	(\$187,013)	\$436,364	(\$132,971)	(\$633,385)	\$12,137,561	\$8,864,733	\$443,237	\$0	\$9,307,969
10	80	69.54%	\$0	\$606,878	(\$182,063)	\$424,815	(\$139,620)	(\$652,387)	\$11,770,369	\$9,307,969	\$465,398	\$0	\$9,773,368
11	81	65.68%	\$0	\$588,518	(\$176,556)	\$411,963	(\$146,601)	(\$671,958)	\$11,363,774	\$9,773,368	\$488,668	\$0	\$10,262,036
12	82	61.65%	\$0	\$568,189	(\$170,457)	\$397,732	(\$153,931)	(\$692,117)	\$10,915,458	\$10,262,036	\$513,102	\$0	\$10,775,138
13	83	57.48%	\$0	\$545,773	(\$163,732)	\$382,041	(\$161,627)	(\$712,880)	\$10,422,992	\$10,775,138	\$538,757	\$0	\$11,313,895
14	84	53.11%	\$0	\$521,150	(\$156,345)	\$364,805	(\$169,708)	(\$734,267)	\$9,883,821	\$11,313,895	\$565,695	\$0	\$11,879,590
15	85	48.61%	\$0	\$494,191	(\$148,257)	\$345,934	(\$178,194)	(\$756,295)	\$9,295,266	\$11,879,590	\$593,979	\$0	\$12,473,569
16	86	44.02%	\$0	\$464,763	(\$139,429)	\$325,334	(\$187,104)	(\$778,984)	\$8,654,513	\$12,473,569	\$623,678	\$0	\$13,097,248
17	87	39.38%	\$0	\$432,726	(\$129,818)	\$302,908	(\$196,459)	(\$802,353)	\$7,958,609	\$13,097,248	\$654,862	\$0	\$13,752,110
18	88	34.77%	\$0	\$397,930	(\$119,379)	\$278,551	(\$206,282)	(\$826,424)	\$7,204,455	\$13,752,110	\$687,605	\$0	\$14,439,715
19	89	30.26%	\$0	\$360,223	(\$108,067)	\$252,156	(\$216,596)	(\$851,217)	\$6,388,799	\$14,439,715	\$721,986	\$0	\$15,161,701
20	90	25.91%	\$0	\$319,440	(\$95,832)	\$223,608	(\$227,426)	(\$876,753)	\$5,508,228	\$15,161,701	\$758,085	\$0	\$15,919,786
21	91	21.80%	\$0	\$275,411	(\$82,623)	\$192,788	(\$238,797)	(\$903,056)	\$4,559,164	\$15,919,786	\$795,989	\$0	\$16,715,776
22	92	18.00%	\$0	\$227,958	(\$68,387)	\$159,571	(\$250,737)	(\$930,147)	\$3,537,851	\$16,715,776	\$835,789	\$0	\$17,551,564
23	93	14.56%	\$0	\$176,893	(\$53,068)	\$123,825	(\$263,273)	(\$958,052)	\$2,440,350	\$17,551,564	\$877,578	\$0	\$18,429,143
24	94	11.51%	\$0	\$122,018	(\$36,605)	\$85,412	(\$276,437)	(\$986,793)	\$1,262,532	\$18,429,143	\$921,457	\$0	\$19,350,600
25	95	8.89%	\$0	\$63,127	(\$18,938)	\$44,189	(\$290,259)	(\$1,016,397)	\$65	\$19,350,600	\$967,530	\$0	\$20,318,130



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Illustrating the “Burn” – Scenario Two

Gift of \$6,000,000, Leaving Senior with \$14,000,000 to Age 95

Year #	Grantor Age	Prob Survival Through Year	Year One Gift	Grantor's Income Before Taxes	Income Taxes on Grantor's Income	Net Income (After Taxes)	Income Tax (Burn) on Trust Income	Annual Savings / (Spending)	End of Year Investments Value
0	70	100.00%	\$6,000,000	\$0	\$0	\$0	\$0	\$0	\$20,000,000
0	70	100.00%	\$6,000,000	\$0	\$0	\$0	\$0	\$0	\$14,000,000
1	71	95.95%	\$6,000,000	\$700,000	(\$210,000)	\$490,000	(\$90,000)	(\$500,000)	\$13,900,000
2	72	93.70%	\$6,000,000	\$695,000	(\$208,500)	\$486,500	(\$94,500)	(\$515,000)	\$13,777,000
3	73	91.30%	\$6,000,000	\$688,850	(\$206,655)	\$482,195	(\$99,225)	(\$530,450)	\$13,629,520
4	74	88.73%	\$6,000,000	\$681,476	(\$204,443)	\$477,033	(\$104,186)	(\$546,364)	\$13,456,003
5	75	86.00%	\$6,000,000	\$672,800	(\$201,840)	\$470,960	(\$109,396)	(\$562,754)	\$13,254,814
6	76	83.09%	\$6,000,000	\$662,741	(\$198,822)	\$463,918	(\$114,865)	(\$579,637)	\$13,024,230
7	77	80.00%	\$6,000,000	\$651,211	(\$195,363)	\$455,848	(\$120,609)	(\$597,026)	\$12,762,443
8	78	76.70%	\$6,000,000	\$638,122	(\$191,437)	\$446,686	(\$126,639)	(\$614,937)	\$12,467,553
9	79	73.22%	\$6,000,000	\$623,378	(\$187,013)	\$436,364	(\$132,971)	(\$633,385)	\$12,137,561
10	80	69.54%	\$6,000,000	\$606,878	(\$182,063)	\$424,815	(\$139,620)	(\$652,387)	\$11,770,369
11	81	65.68%	\$6,000,000	\$588,518	(\$176,556)	\$411,963	(\$146,601)	(\$671,958)	\$11,363,774
12	82	61.65%	\$6,000,000	\$568,189	(\$170,457)	\$397,732	(\$153,931)	(\$692,117)	\$10,915,458
13	83	57.48%	\$6,000,000	\$545,773	(\$163,732)	\$382,041	(\$161,627)	(\$712,880)	\$10,422,992
14	84	53.11%	\$6,000,000	\$521,150	(\$156,345)	\$364,805	(\$169,708)	(\$734,267)	\$9,883,821
15	85	48.61%	\$6,000,000	\$494,191	(\$148,257)	\$345,934	(\$178,194)	(\$756,295)	\$9,295,266
16	86	44.02%	\$6,000,000	\$464,763	(\$139,429)	\$325,334	(\$187,104)	(\$778,984)	\$8,654,513
17	87	39.38%	\$6,000,000	\$432,726	(\$129,818)	\$302,908	(\$196,459)	(\$802,353)	\$7,958,609
18	88	34.77%	\$6,000,000	\$397,930	(\$119,379)	\$278,551	(\$206,282)	(\$826,424)	\$7,204,455
19	89	30.26%	\$6,000,000	\$360,223	(\$108,067)	\$252,156	(\$216,596)	(\$851,217)	\$6,388,799
20	90	25.91%	\$6,000,000	\$319,440	(\$95,832)	\$223,608	(\$227,426)	(\$876,753)	\$5,508,228
21	91	21.80%	\$6,000,000	\$275,411	(\$82,623)	\$192,788	(\$238,797)	(\$903,056)	\$4,559,164
22	92	18.00%	\$6,000,000	\$227,958	(\$68,387)	\$159,571	(\$250,737)	(\$930,147)	\$3,537,851
23	93	14.56%	\$6,000,000	\$176,893	(\$53,068)	\$123,825	(\$263,273)	(\$958,052)	\$2,440,350
24	94	11.51%	\$6,000,000	\$122,018	(\$36,605)	\$85,412	(\$276,437)	(\$986,793)	\$1,262,532
25	95	8.89%	\$6,000,000	\$63,127	(\$18,938)	\$44,189	(\$290,259)	(\$1,016,397)	\$65



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Illustrating the “Burn” – Scenario Two

Gift of \$6,000,000, Leaving Senior with \$14,000,000 to Age 95

Year #	Beginning Trust Value	Trust Growth	Income Tax on Trust Income	End Trust Value	Estate Tax Savings
0	\$0	\$0	\$0	\$0	
0	\$0	\$0	\$0	\$6,000,000	
1	\$6,000,000	\$300,000	\$0	\$6,300,000	\$120,000
2	\$6,300,000	\$315,000	\$0	\$6,615,000	\$246,000
3	\$6,615,000	\$330,750	\$0	\$6,945,750	\$378,300
4	\$6,945,750	\$347,288	\$0	\$7,293,038	\$517,215
5	\$7,293,038	\$364,652	\$0	\$7,657,689	\$663,076
6	\$7,657,689	\$382,884	\$0	\$8,040,574	\$816,230
7	\$8,040,574	\$402,029	\$0	\$8,442,603	\$977,041
8	\$8,442,603	\$422,130	\$0	\$8,864,733	\$1,145,893
9	\$8,864,733	\$443,237	\$0	\$9,307,969	\$1,323,188
10	\$9,307,969	\$465,398	\$0	\$9,773,368	\$1,509,347
11	\$9,773,368	\$488,668	\$0	\$10,262,036	\$1,704,814
12	\$10,262,036	\$513,102	\$0	\$10,775,138	\$1,910,055
13	\$10,775,138	\$538,757	\$0	\$11,313,895	\$2,125,558
14	\$11,313,895	\$565,695	\$0	\$11,879,590	\$2,351,836
15	\$11,879,590	\$593,979	\$0	\$12,473,569	\$2,589,428
16	\$12,473,569	\$623,678	\$0	\$13,097,248	\$2,838,899
17	\$13,097,248	\$654,862	\$0	\$13,752,110	\$3,100,844
18	\$13,752,110	\$687,605	\$0	\$14,439,715	\$3,375,886
19	\$14,439,715	\$721,986	\$0	\$15,161,701	\$3,664,680
20	\$15,161,701	\$758,085	\$0	\$15,919,786	\$3,967,914
21	\$15,919,786	\$795,989	\$0	\$16,715,776	\$4,286,310
22	\$16,715,776	\$835,789	\$0	\$17,551,564	\$4,620,626
23	\$17,551,564	\$877,578	\$0	\$18,429,143	\$4,971,657
24	\$18,429,143	\$921,457	\$0	\$19,350,600	\$5,340,240
25	\$19,350,600	\$967,530	\$0	\$20,318,130	\$5,727,252



Brandon Ketron, Esq.
Jerry Hesck, Esq.

Illustrating the “Burn” – Scenario Two

Gift of \$6,000,000, Leaving Senior with \$14,000,000 to Age 95

- At age 95 Senior has \$65 of assets remaining.
- What if Senior lives past the age of 95?
- The next example assumes that Senior lives to age 100 so that \$14,000,000 of retained income producing assets is not enough.
- Note that the probability of Senior living past age 95 is only 6.69%.



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Illustrating the “Burn” – Scenario Three

Gift of \$6,000,000 to Age 100

Year #	Grantor Age	Prob Survival Through Year	Year One Gift	Grantor's Income Before Taxes	Income Taxes on Grantor's Income	Net Income (After Taxes)	Income Tax (Burn) on Trust Income	Annual Savings / (Spending)	End of Year Investments Value	Beginning Trust Value	Trust Growth	Income Tax on Trust Income	End Trust Value
0	70	100.00%	\$0	\$0	\$0	\$0	\$0	\$0	\$20,000,000	\$0	\$0	\$0	\$0
0	70	100.00%	\$6,000,000	\$0	\$0	\$0	\$0	\$0	\$14,000,000	\$0	\$0	\$0	\$6,000,000
1	71	95.95%	\$0	\$700,000	(\$210,000)	\$490,000	(\$90,000)	(\$500,000)	\$13,900,000	\$6,000,000	\$300,000	\$0	\$6,300,000
2	72	93.70%	\$0	\$695,000	(\$208,500)	\$486,500	(\$94,500)	(\$515,000)	\$13,777,000	\$6,300,000	\$315,000	\$0	\$6,615,000
3	73	91.30%	\$0	\$688,850	(\$206,655)	\$482,195	(\$99,225)	(\$530,450)	\$13,629,520	\$6,615,000	\$330,750	\$0	\$6,945,750
4	74	88.73%	\$0	\$681,476	(\$204,443)	\$477,033	(\$104,186)	(\$546,364)	\$13,456,003	\$6,945,750	\$347,288	\$0	\$7,293,038
5	75	86.00%	\$0	\$672,800	(\$201,840)	\$470,960	(\$109,396)	(\$562,754)	\$13,254,814	\$7,293,038	\$364,652	\$0	\$7,657,689
6	76	83.09%	\$0	\$662,741	(\$198,822)	\$463,918	(\$114,865)	(\$579,637)	\$13,024,230	\$7,657,689	\$382,884	\$0	\$8,040,574
7	77	80.00%	\$0	\$651,211	(\$195,363)	\$455,848	(\$120,609)	(\$597,026)	\$12,762,443	\$8,040,574	\$402,029	\$0	\$8,442,603
8	78	76.70%	\$0	\$638,122	(\$191,437)	\$446,686	(\$126,639)	(\$614,937)	\$12,467,553	\$8,442,603	\$422,130	\$0	\$8,864,733
9	79	73.22%	\$0	\$623,378	(\$187,013)	\$436,364	(\$132,971)	(\$633,385)	\$12,137,561	\$8,864,733	\$443,237	\$0	\$9,307,969
10	80	69.54%	\$0	\$606,878	(\$182,063)	\$424,815	(\$139,620)	(\$652,387)	\$11,770,369	\$9,307,969	\$465,398	\$0	\$9,773,368
11	81	65.68%	\$0	\$588,518	(\$176,556)	\$411,963	(\$146,601)	(\$671,958)	\$11,363,774	\$9,773,368	\$488,668	\$0	\$10,262,036
12	82	61.65%	\$0	\$568,189	(\$170,457)	\$397,732	(\$153,931)	(\$692,117)	\$10,915,458	\$10,262,036	\$513,102	\$0	\$10,775,138
13	83	57.48%	\$0	\$545,773	(\$163,732)	\$382,041	(\$161,627)	(\$712,880)	\$10,422,992	\$10,775,138	\$538,757	\$0	\$11,313,895
14	84	53.11%	\$0	\$521,150	(\$156,345)	\$364,805	(\$169,708)	(\$734,267)	\$9,883,821	\$11,313,895	\$565,695	\$0	\$11,879,590
15	85	48.61%	\$0	\$494,191	(\$148,257)	\$345,934	(\$178,194)	(\$756,295)	\$9,295,266	\$11,879,590	\$593,979	\$0	\$12,473,569
16	86	44.02%	\$0	\$464,763	(\$139,429)	\$325,334	(\$187,104)	(\$778,984)	\$8,654,513	\$12,473,569	\$623,678	\$0	\$13,097,248
17	87	39.38%	\$0	\$432,726	(\$129,818)	\$302,908	(\$196,459)	(\$802,353)	\$7,958,609	\$13,097,248	\$654,862	\$0	\$13,752,110
18	88	34.77%	\$0	\$397,930	(\$119,379)	\$278,551	(\$206,282)	(\$826,424)	\$7,204,455	\$13,752,110	\$687,605	\$0	\$14,439,715
19	89	30.26%	\$0	\$360,223	(\$108,067)	\$252,156	(\$216,596)	(\$851,217)	\$6,388,799	\$14,439,715	\$721,986	\$0	\$15,161,701
20	90	25.91%	\$0	\$319,440	(\$95,832)	\$223,608	(\$227,426)	(\$876,753)	\$5,508,228	\$15,161,701	\$758,085	\$0	\$15,919,786
21	91	21.80%	\$0	\$275,411	(\$82,623)	\$192,788	(\$238,797)	(\$903,056)	\$4,559,164	\$15,919,786	\$795,989	\$0	\$16,715,776
22	92	18.00%	\$0	\$227,958	(\$68,387)	\$159,571	(\$250,737)	(\$930,147)	\$3,537,851	\$16,715,776	\$835,789	\$0	\$17,551,564
23	93	14.56%	\$0	\$176,893	(\$53,068)	\$123,825	(\$263,273)	(\$958,052)	\$2,440,350	\$17,551,564	\$877,578	\$0	\$18,429,143
24	94	11.51%	\$0	\$122,018	(\$36,605)	\$85,412	(\$276,437)	(\$986,793)	\$1,262,532	\$18,429,143	\$921,457	\$0	\$19,350,600
25	95	8.89%	\$0	\$63,127	(\$18,938)	\$44,189	(\$290,259)	(\$1,016,397)	\$65	\$19,350,600	\$967,530	\$0	\$20,318,130
26	96	6.69%	\$0	\$3	(\$1)	\$2	(\$304,772)	(\$1,046,889)	(\$1,351,594)	\$20,318,130	\$1,015,906	\$0	\$21,334,036
27	97	4.90%	\$0	(\$67,580)	\$20,274	(\$47,306)	(\$320,011)	(\$1,078,296)	(\$2,797,206)	\$21,334,036	\$1,066,702	\$0	\$22,400,738
28	98	3.49%	\$0	(\$139,860)	\$41,958	(\$97,902)	(\$336,011)	(\$1,110,645)	(\$4,341,764)	\$22,400,738	\$1,120,037	\$0	\$23,520,775
29	99	2.41%	\$0	(\$217,088)	\$65,126	(\$151,962)	(\$352,812)	(\$1,143,964)	(\$5,990,501)	\$23,520,775	\$1,176,039	\$0	\$24,696,814
30	100	1.62%	\$0	(\$299,525)	\$89,858	(\$209,668)	(\$370,452)	(\$1,178,283)	(\$7,748,904)	\$24,696,814	\$1,234,841	\$0	\$25,931,654



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Illustrating the “Burn” – Scenario Three

Gift of \$6,000,000 to Age 100

Year #	Grantor Age	Prob Survival Through Year	Year One Gift	Grantor's Income Before Taxes	Income Taxes on Grantor's Income	Net Income (After Taxes)	Income Tax (Burn) on Trust Income	Annual Savings / (Spending)	End of Year Investments Value
0	70	100.00%	\$6,000,000	\$0	\$0	\$0	\$0	\$0	\$20,000,000
0	70	100.00%	\$6,000,000	\$0	\$0	\$0	\$0	\$0	\$14,000,000
1	71	95.95%	\$6,000,000	\$700,000	(\$210,000)	\$490,000	(\$90,000)	(\$500,000)	\$13,900,000
2	72	93.70%	\$6,000,000	\$695,000	(\$208,500)	\$486,500	(\$94,500)	(\$515,000)	\$13,777,000
3	73	91.30%	\$6,000,000	\$688,850	(\$206,655)	\$482,195	(\$99,225)	(\$530,450)	\$13,629,520
4	74	88.73%	\$6,000,000	\$681,476	(\$204,443)	\$477,033	(\$104,186)	(\$546,364)	\$13,456,003
5	75	86.00%	\$6,000,000	\$672,800	(\$201,840)	\$470,960	(\$109,396)	(\$562,754)	\$13,254,814
6	76	83.09%	\$6,000,000	\$662,741	(\$198,822)	\$463,918	(\$114,865)	(\$579,637)	\$13,024,230
7	77	80.00%	\$6,000,000	\$651,211	(\$195,363)	\$455,848	(\$120,609)	(\$597,026)	\$12,762,443
8	78	76.70%	\$6,000,000	\$638,122	(\$191,437)	\$446,686	(\$126,639)	(\$614,937)	\$12,467,553
9	79	73.22%	\$6,000,000	\$623,378	(\$187,013)	\$436,364	(\$132,971)	(\$633,385)	\$12,137,561
10	80	69.54%	\$6,000,000	\$606,878	(\$182,063)	\$424,815	(\$139,620)	(\$652,387)	\$11,770,369
11	81	65.68%	\$6,000,000	\$588,518	(\$176,556)	\$411,963	(\$146,601)	(\$671,958)	\$11,363,774
12	82	61.65%	\$6,000,000	\$568,189	(\$170,457)	\$397,732	(\$153,931)	(\$692,117)	\$10,915,458
13	83	57.48%	\$6,000,000	\$545,773	(\$163,732)	\$382,041	(\$161,627)	(\$712,880)	\$10,422,992
14	84	53.11%	\$6,000,000	\$521,150	(\$156,345)	\$364,805	(\$169,708)	(\$734,267)	\$9,883,821
15	85	48.61%	\$6,000,000	\$494,191	(\$148,257)	\$345,934	(\$178,194)	(\$756,295)	\$9,295,266
16	86	44.02%	\$6,000,000	\$464,763	(\$139,429)	\$325,334	(\$187,104)	(\$778,984)	\$8,654,513
17	87	39.38%	\$6,000,000	\$432,726	(\$129,818)	\$302,908	(\$196,459)	(\$802,353)	\$7,958,609
18	88	34.77%	\$6,000,000	\$397,930	(\$119,379)	\$278,551	(\$206,282)	(\$826,424)	\$7,204,455
19	89	30.26%	\$6,000,000	\$360,223	(\$108,067)	\$252,156	(\$216,596)	(\$851,217)	\$6,388,799
20	90	25.91%	\$6,000,000	\$319,440	(\$95,832)	\$223,608	(\$227,426)	(\$876,753)	\$5,508,228
21	91	21.80%	\$6,000,000	\$275,411	(\$82,623)	\$192,788	(\$238,797)	(\$903,056)	\$4,559,164
22	92	18.00%	\$6,000,000	\$227,958	(\$68,387)	\$159,571	(\$250,737)	(\$930,147)	\$3,537,851
23	93	14.56%	\$6,000,000	\$176,893	(\$53,068)	\$123,825	(\$263,273)	(\$958,052)	\$2,440,350
24	94	11.51%	\$6,000,000	\$122,018	(\$36,605)	\$85,412	(\$276,437)	(\$986,793)	\$1,262,532
25	95	8.89%	\$6,000,000	\$63,127	(\$18,938)	\$44,189	(\$290,259)	(\$1,016,397)	\$65
26	96	6.69%	\$6,000,000	\$3	(\$1)	\$2	(\$304,772)	(\$1,046,889)	(\$1,351,594)
27	97	4.90%	\$6,000,000				(\$320,011)	(\$1,078,296)	(\$2,797,206)
28	98	3.49%	\$6,000,000				(\$336,011)	(\$1,110,645)	(\$4,341,764)
29	99	2.41%	\$6,000,000				(\$352,812)	(\$1,143,964)	(\$5,990,501)
30	100	1.62%	\$6,000,000				(\$370,452)	(\$1,178,283)	(\$7,748,904)



Brandon Ketron, Esq.
Jerry Hesch, Esq.



Using Financial Modeling to Explain the Estate Tax Benefits of
a Planning Technique and Evaluate the Grantor's Obligation
to Pay | Saturday | 4.13.24

Illustrating the “Burn” – Scenario Three

Gift of \$6,000,000 to Age 100

Year #	Beginning Trust Value	Trust Growth	Income Tax on Trust Income	End Trust Value	Estate Tax Savings
0	\$0	\$0	\$0	\$0	
0	\$0	\$0	\$0	\$6,000,000	
1	\$6,000,000	\$300,000	\$0	\$6,300,000	\$120,000
2	\$6,300,000	\$315,000	\$0	\$6,615,000	\$246,000
3	\$6,615,000	\$330,750	\$0	\$6,945,750	\$378,300
4	\$6,945,750	\$347,288	\$0	\$7,293,038	\$517,215
5	\$7,293,038	\$364,652	\$0	\$7,657,689	\$663,076
6	\$7,657,689	\$382,884	\$0	\$8,040,574	\$816,230
7	\$8,040,574	\$402,029	\$0	\$8,442,603	\$977,041
8	\$8,442,603	\$422,130	\$0	\$8,864,733	\$1,145,893
9	\$8,864,733	\$443,237	\$0	\$9,307,969	\$1,323,188
10	\$9,307,969	\$465,398	\$0	\$9,773,368	\$1,509,347
11	\$9,773,368	\$488,668	\$0	\$10,262,036	\$1,704,814
12	\$10,262,036	\$513,102	\$0	\$10,775,138	\$1,910,055
13	\$10,775,138	\$538,757	\$0	\$11,313,895	\$2,125,558
14	\$11,313,895	\$565,695	\$0	\$11,879,590	\$2,351,836
15	\$11,879,590	\$593,979	\$0	\$12,473,569	\$2,589,428
16	\$12,473,569	\$623,678	\$0	\$13,097,248	\$2,838,899
17	\$13,097,248	\$654,862	\$0	\$13,752,110	\$3,100,844
18	\$13,752,110	\$687,605	\$0	\$14,439,715	\$3,375,886
19	\$14,439,715	\$721,986	\$0	\$15,161,701	\$3,664,680
20	\$15,161,701	\$758,085	\$0	\$15,919,786	\$3,967,914
21	\$15,919,786	\$795,989	\$0	\$16,715,776	\$4,286,310
22	\$16,715,776	\$835,789	\$0	\$17,551,564	\$4,620,626
23	\$17,551,564	\$877,578	\$0	\$18,429,143	\$4,971,657
24	\$18,429,143	\$921,457	\$0	\$19,350,600	\$5,340,240
25	\$19,350,600	\$967,530	\$0	\$20,318,130	\$5,727,252
26	\$20,318,130	\$1,015,906	\$0	\$21,334,036	\$6,133,614
27	\$21,334,036	\$1,066,702	\$0	\$22,400,738	\$6,560,295
28	\$22,400,738	\$1,120,037	\$0	\$23,520,775	\$7,008,310
29	\$23,520,775	\$1,176,039	\$0	\$24,696,814	\$7,478,725
30	\$24,696,814	\$1,234,841	\$0	\$25,931,654	\$7,972,662



Brandon Ketron, Esq.
Jerry Hesck, Esq.

Illustrating the “Burn” – Scenario Three

Gift of \$4,000,000 to Age 100

- At age 96, Senior runs out of assets again.
- The next example illustrates Senior gifts \$4,000,000 of assets and retains \$16,000,000. At age 100 Senior still has \$894,981 of retained assets.
- Now Senior feels financially comfortable.
- If Senior’s investment assets were more than \$20,000,000, say \$30,000,000, then Senior can consider using the entire \$13,610,000 gift tax exemption for 2024.



Brandon Ketron, Esq.
Jerry Hesche, Esq.

Illustrating the “Burn” – Scenario Three

Gift of \$4,000,000, leaving Senior with \$16,000,000 to Age 100

Year #	Grantor Age	Prob Survival Through Year	Year One Gift	Grantor's Income Before Taxes	Income Taxes on Grantor's Income	Net Income (After Taxes)	Income Tax (Burn) on Trust Income	Annual Savings / (Spending)	End of Year Investments Value	Beginning Trust Value	Trust Growth	Income Tax on Trust Income	End Trust Value
0	70	100.00%	\$0	\$0	\$0	\$0	\$0	\$0	\$20,000,000	\$0	\$0	\$0	\$0
0	70	100.00%	\$4,000,000	\$0	\$0	\$0	\$0	\$0	\$16,000,000	\$0	\$0	\$0	\$4,000,000
1	71	95.95%	\$0	\$800,000	(\$240,000)	\$560,000	(\$60,000)	(\$500,000)	\$16,000,000	\$4,000,000	\$200,000	\$0	\$4,200,000
2	72	93.70%	\$0	\$800,000	(\$240,000)	\$560,000	(\$63,000)	(\$515,000)	\$15,982,000	\$4,200,000	\$210,000	\$0	\$4,410,000
3	73	91.30%	\$0	\$799,100	(\$239,730)	\$559,370	(\$66,150)	(\$530,450)	\$15,944,770	\$4,410,000	\$220,500	\$0	\$4,630,500
4	74	88.73%	\$0	\$797,239	(\$239,172)	\$558,067	(\$69,458)	(\$546,364)	\$15,887,016	\$4,630,500	\$231,525	\$0	\$4,862,025
5	75	86.00%	\$0	\$794,351	(\$238,305)	\$556,046	(\$72,930)	(\$562,754)	\$15,807,377	\$4,862,025	\$243,101	\$0	\$5,105,126
6	76	83.09%	\$0	\$790,369	(\$237,111)	\$553,258	(\$76,577)	(\$579,637)	\$15,704,421	\$5,105,126	\$255,256	\$0	\$5,360,383
7	77	80.00%	\$0	\$785,221	(\$235,566)	\$549,655	(\$80,406)	(\$597,026)	\$15,576,644	\$5,360,383	\$268,019	\$0	\$5,628,402
8	78	76.70%	\$0	\$778,832	(\$233,650)	\$545,183	(\$84,426)	(\$614,937)	\$15,422,463	\$5,628,402	\$281,420	\$0	\$5,909,822
9	79	73.22%	\$0	\$771,123	(\$231,337)	\$539,786	(\$88,647)	(\$633,385)	\$15,240,217	\$5,909,822	\$295,491	\$0	\$6,205,313
10	80	69.54%	\$0	\$762,011	(\$228,603)	\$533,408	(\$93,080)	(\$652,387)	\$15,028,159	\$6,205,313	\$310,266	\$0	\$6,515,579
11	81	65.68%	\$0	\$751,408	(\$225,422)	\$525,986	(\$97,734)	(\$671,958)	\$14,784,452	\$6,515,579	\$325,779	\$0	\$6,841,357
12	82	61.65%	\$0	\$739,223	(\$221,767)	\$517,456	(\$102,620)	(\$692,117)	\$14,507,171	\$6,841,357	\$342,068	\$0	\$7,183,425
13	83	57.48%	\$0	\$725,359	(\$217,608)	\$507,751	(\$107,751)	(\$712,880)	\$14,194,290	\$7,183,425	\$359,171	\$0	\$7,542,597
14	84	53.11%	\$0	\$709,714	(\$212,914)	\$496,800	(\$113,139)	(\$734,267)	\$13,843,684	\$7,542,597	\$377,130	\$0	\$7,919,726
15	85	48.61%	\$0	\$692,184	(\$207,655)	\$484,529	(\$118,796)	(\$756,295)	\$13,453,122	\$7,919,726	\$395,986	\$0	\$8,315,713
16	86	44.02%	\$0	\$672,656	(\$201,797)	\$470,859	(\$124,736)	(\$778,984)	\$13,020,262	\$8,315,713	\$415,786	\$0	\$8,731,498
17	87	39.38%	\$0	\$651,013	(\$195,304)	\$455,709	(\$130,972)	(\$802,353)	\$12,542,646	\$8,731,498	\$436,575	\$0	\$9,168,073
18	88	34.77%	\$0	\$627,132	(\$188,140)	\$438,993	(\$137,521)	(\$826,424)	\$12,017,694	\$9,168,073	\$458,404	\$0	\$9,626,477
19	89	30.26%	\$0	\$600,885	(\$180,265)	\$420,619	(\$144,397)	(\$851,217)	\$11,442,699	\$9,626,477	\$481,324	\$0	\$10,107,801
20	90	25.91%	\$0	\$572,135	(\$171,640)	\$400,494	(\$151,617)	(\$876,753)	\$10,814,824	\$10,107,801	\$505,390	\$0	\$10,613,191
21	91	21.80%	\$0	\$540,741	(\$162,222)	\$378,519	(\$159,198)	(\$903,056)	\$10,131,089	\$10,613,191	\$530,660	\$0	\$11,143,850
22	92	18.00%	\$0	\$506,554	(\$151,966)	\$354,588	(\$167,158)	(\$930,147)	\$9,388,372	\$11,143,850	\$557,193	\$0	\$11,701,043
23	93	14.56%	\$0	\$469,419	(\$140,826)	\$328,593	(\$175,516)	(\$958,052)	\$8,583,398	\$11,701,043	\$585,052	\$0	\$12,286,095
24	94	11.51%	\$0	\$429,170	(\$128,751)	\$300,419	(\$184,291)	(\$986,793)	\$7,712,732	\$12,286,095	\$614,305	\$0	\$12,900,400
25	95	8.89%	\$0	\$385,637	(\$115,691)	\$269,946	(\$193,506)	(\$1,016,397)	\$6,772,774	\$12,900,400	\$645,020	\$0	\$13,545,420
26	96	6.69%	\$0	\$338,639	(\$101,592)	\$237,047	(\$203,181)	(\$1,046,889)	\$5,759,751	\$13,545,420	\$677,271	\$0	\$14,222,691
27	97	4.90%	\$0	\$287,988	(\$86,396)	\$201,591	(\$213,340)	(\$1,078,296)	\$4,669,707	\$14,222,691	\$711,135	\$0	\$14,933,825
28	98	3.49%	\$0	\$233,485	(\$70,046)	\$163,440	(\$224,007)	(\$1,110,645)	\$3,498,494	\$14,933,825	\$746,691	\$0	\$15,680,517
29	99	2.41%	\$0	\$174,925	(\$52,477)	\$122,447	(\$235,208)	(\$1,143,964)	\$2,241,770	\$15,680,517	\$784,026	\$0	\$16,464,542
30	100	1.62%	\$0	\$112,089	(\$33,627)	\$78,462	(\$246,968)	(\$1,178,283)	\$894,981	\$16,464,542	\$823,227	\$0	\$17,287,770



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Illustrating the “Burn” – Scenario Three

Gift of \$4,000,000, leaving Senior with \$16,000,000 to Age 100

Year #	Grantor Age	Prob Survival Through Year	Year One Gift	Grantor's Income Before Taxes	Income Taxes on Grantor's Income	Net Income (After Taxes)	Income Tax (Burn) on Trust Income	Annual Savings / (Spending)	End of Year Investments Value
0	70	100.00%	\$4,000,000	\$0	\$0	\$0	\$0	\$0	\$20,000,000
0	70	100.00%	\$4,000,000	\$0	\$0	\$0	\$0	\$0	\$16,000,000
1	71	95.95%	\$4,000,000	\$800,000	(\$240,000)	\$560,000	(\$60,000)	(\$500,000)	\$16,000,000
2	72	93.70%	\$4,000,000	\$800,000	(\$240,000)	\$560,000	(\$63,000)	(\$515,000)	\$15,982,000
3	73	91.30%	\$4,000,000	\$799,100	(\$239,730)	\$559,370	(\$66,150)	(\$530,450)	\$15,944,770
4	74	88.73%	\$4,000,000	\$797,239	(\$239,172)	\$558,067	(\$69,458)	(\$546,364)	\$15,887,016
5	75	86.00%	\$4,000,000	\$794,351	(\$238,305)	\$556,046	(\$72,930)	(\$562,754)	\$15,807,377
6	76	83.09%	\$4,000,000	\$790,369	(\$237,111)	\$553,258	(\$76,577)	(\$579,637)	\$15,704,421
7	77	80.00%	\$4,000,000	\$785,221	(\$235,566)	\$549,655	(\$80,406)	(\$597,026)	\$15,576,644
8	78	76.70%	\$4,000,000	\$778,832	(\$233,650)	\$545,183	(\$84,426)	(\$614,937)	\$15,422,463
9	79	73.22%	\$4,000,000	\$771,123	(\$231,337)	\$539,786	(\$88,647)	(\$633,385)	\$15,240,217
10	80	69.54%	\$4,000,000	\$762,011	(\$228,603)	\$533,408	(\$93,080)	(\$652,387)	\$15,028,159
11	81	65.68%	\$4,000,000	\$751,408	(\$225,422)	\$525,986	(\$97,734)	(\$671,958)	\$14,784,452
12	82	61.65%	\$4,000,000	\$739,223	(\$221,767)	\$517,456	(\$102,620)	(\$692,117)	\$14,507,171
13	83	57.48%	\$4,000,000	\$725,359	(\$217,608)	\$507,751	(\$107,751)	(\$712,880)	\$14,194,290
14	84	53.11%	\$4,000,000	\$709,714	(\$212,914)	\$496,800	(\$113,139)	(\$734,267)	\$13,843,684
15	85	48.61%	\$4,000,000	\$692,184	(\$207,655)	\$484,529	(\$118,796)	(\$756,295)	\$13,453,122
16	86	44.02%	\$4,000,000	\$672,656	(\$201,797)	\$470,859	(\$124,736)	(\$778,984)	\$13,020,262
17	87	39.38%	\$4,000,000	\$651,013	(\$195,304)	\$455,709	(\$130,972)	(\$802,353)	\$12,542,646
18	88	34.77%	\$4,000,000	\$627,132	(\$188,140)	\$438,993	(\$137,521)	(\$826,424)	\$12,017,694
19	89	30.26%	\$4,000,000	\$600,885	(\$180,265)	\$420,619	(\$144,397)	(\$851,217)	\$11,442,699
20	90	25.91%	\$4,000,000	\$572,135	(\$171,640)	\$400,494	(\$151,617)	(\$876,753)	\$10,814,824
21	91	21.80%	\$4,000,000	\$540,741	(\$162,222)	\$378,519	(\$159,198)	(\$903,056)	\$10,131,089
22	92	18.00%	\$4,000,000	\$506,554	(\$151,966)	\$354,588	(\$167,158)	(\$930,147)	\$9,388,372
23	93	14.56%	\$4,000,000	\$469,419	(\$140,826)	\$328,593	(\$175,516)	(\$958,052)	\$8,583,398
24	94	11.51%	\$4,000,000	\$429,170	(\$128,751)	\$300,419	(\$184,291)	(\$986,793)	\$7,712,732
25	95	8.89%	\$4,000,000	\$385,637	(\$115,691)	\$269,946	(\$193,506)	(\$1,016,397)	\$6,772,774
26	96	6.69%	\$4,000,000	\$338,639	(\$101,592)	\$237,047	(\$203,181)	(\$1,046,889)	\$5,759,751
27	97	4.90%	\$4,000,000	\$287,988	(\$86,396)	\$201,591	(\$213,340)	(\$1,078,296)	\$4,669,707
28	98	3.49%	\$4,000,000	\$233,485	(\$70,046)	\$163,440	(\$224,007)	(\$1,110,645)	\$3,498,494
29	99	2.41%	\$4,000,000	\$174,925	(\$52,477)	\$122,447	(\$235,208)	(\$1,143,964)	\$2,241,770
30	100	1.62%	\$4,000,000	\$112,089	(\$33,627)	\$78,462	(\$246,968)	(\$1,178,283)	\$894,981



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Illustrating the “Burn” – Scenario Three

Gift of \$4,000,000, leaving Senior with \$16,000,000 to Age 100

Year #	Beginning Trust Value	Trust Growth	Income Tax on Trust Income	End Trust Value	Estate Tax Savings
0	\$0	\$0	\$0	\$0	
0	\$0	\$0	\$0	\$4,000,000	
1	\$4,000,000	\$200,000	\$0	\$4,200,000	\$80,000
2	\$4,200,000	\$210,000	\$0	\$4,410,000	\$164,000
3	\$4,410,000	\$220,500	\$0	\$4,630,500	\$252,200
4	\$4,630,500	\$231,525	\$0	\$4,862,025	\$344,810
5	\$4,862,025	\$243,101	\$0	\$5,105,126	\$442,051
6	\$5,105,126	\$255,256	\$0	\$5,360,383	\$544,153
7	\$5,360,383	\$268,019	\$0	\$5,628,402	\$651,361
8	\$5,628,402	\$281,420	\$0	\$5,909,822	\$763,929
9	\$5,909,822	\$295,491	\$0	\$6,205,313	\$882,125
10	\$6,205,313	\$310,266	\$0	\$6,515,579	\$1,006,231
11	\$6,515,579	\$325,779	\$0	\$6,841,357	\$1,136,543
12	\$6,841,357	\$342,068	\$0	\$7,183,425	\$1,273,370
13	\$7,183,425	\$359,171	\$0	\$7,542,597	\$1,417,039
14	\$7,542,597	\$377,130	\$0	\$7,919,726	\$1,567,891
15	\$7,919,726	\$395,986	\$0	\$8,315,713	\$1,726,285
16	\$8,315,713	\$415,786	\$0	\$8,731,498	\$1,892,599
17	\$8,731,498	\$436,575	\$0	\$9,168,073	\$2,067,229
18	\$9,168,073	\$458,404	\$0	\$9,626,477	\$2,250,591
19	\$9,626,477	\$481,324	\$0	\$10,107,801	\$2,443,120
20	\$10,107,801	\$505,390	\$0	\$10,613,191	\$2,645,276
21	\$10,613,191	\$530,660	\$0	\$11,143,850	\$2,857,540
22	\$11,143,850	\$557,193	\$0	\$11,701,043	\$3,080,417
23	\$11,701,043	\$585,052	\$0	\$12,286,095	\$3,314,438
24	\$12,286,095	\$614,305	\$0	\$12,900,400	\$3,560,160
25	\$12,900,400	\$645,020	\$0	\$13,545,420	\$3,818,168
26	\$13,545,420	\$677,271	\$0	\$14,222,691	\$4,089,076
27	\$14,222,691	\$711,135	\$0	\$14,933,825	\$4,373,530
28	\$14,933,825	\$746,691	\$0	\$15,680,517	\$4,672,207
29	\$15,680,517	\$784,026	\$0	\$16,464,542	\$4,985,817
30	\$16,464,542	\$823,227	\$0	\$17,287,770	\$5,315,108



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Jerry Hesch, Esq.

1. As the gift examples demonstrate, using financial spreadsheets allows the advisor to explain the planning technique using simple to follow numerical examples, achieving the first objective of communicating the estate tax benefits in an understandable manner
- The second objective is to allow the advisor to change the assumptions so that the advisor and the client can both participate in the design of the planning proposal. Without the spreadsheets one would think that someone with \$20,000,000 of income producing assets could take advantage to the 2024 \$13,610,000 gift tax exemption by gifting \$10,000,000 and retaining \$10,000,000.
 - As the gifting examples demonstrate, by changing the assumptions using spreadsheets, the financial result the client feels comfortable with is only a \$4,000,000 gift and retaining \$16,000,000.
 - At the end of the materials, we provide a list of several alternatives that can be implemented when the estate plan is first implemented or afterwards while the grantor is living to reduce or eliminate the impact of the “burn.”



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Jerry Hesch, Esq.

Illustrating the Financial Impacts of an Installment Sale to Grantor Trust

- Assume the following facts:
- Senior age 60 has \$100,000,000 of income producing assets in a LLC, and needs \$1,500,000 this year for personal consumption after social security and pension payments. Assume Senior's living expenses increase at a 3% annual rate
- Assume a 35% valuation discount applies to the LLC membership interests.
- Senior gifts an 18.5% non-voting membership interest in the LLC with an \$18,500,000 capital account to a grantor Trust as a seed gift. Applying a valuation discount, the gift of an 18.5% interest uses \$12,025,000 of Senior's \$13,610,000 gift tax exemption for 2024.
- Senior sells a 57.5% non-voting membership interest with a \$57,500,000 capital account to the grantor Trust in exchange for a \$37,375,000 (assumes a 35% discount applies) 20-year, interest only promissory note bearing interest at 4.18% (\$1,562,000 annual interest).
- Senior retains a 24% membership interest with a \$24,000,000 capital account.
- Assume a 6% investment rate of return on the \$100,000,000 of income producing assets, and a 30% effective Federal and state income tax rate on capital gains and ordinary income.
- The spreadsheet shows that the \$37,375,000 note is paid at maturity in year 20.



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Llc's Capital Accounts After The Gift In Trust And The Installment Sale To The Trust

- The grantor retains a 24% interest with a \$24,000,000 capital account and a \$37,375,000 promissory note for a combined \$61,375,000 of income producing assets

Capital Accounts	Capital Account Value	Discounted Value of non-voting membership interest
Senior (24% interest)	\$24,000,000	NA
Trust by gift (18.5% interest)	\$18,500,000	\$12,025,000 (after discount)
Trust by purchase (57.5% interest)	<u>\$57,500,000</u>	\$37,375,000 (after discount)
Total	<u>\$100,000,000</u>	



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Jerry Hesch, Esq.

In The First Year The Income On The \$24,000,000 Of Retained Partnership Interest Is \$1,440,000. At A 30% Income Tax Rate, The Income Taxes Are \$432,000. The Grantor Nets \$1,008,000 After Taxes.

- The grantor receives \$1,562,275 note interest that is not taxable income.
- The grantor spends \$1,500,000 on personal consumption.
- The trust cannot deduct its interest expense.
- The grantor must pay \$1,368,000 of income taxes on the trust's \$4,560,000 of taxable income.
- The grantor has to invade principal the first year as the revenues the grantor receives the first year are less than the expenses for the first year.
- Personal consumption and the combined income taxes during the first year depletes retained assets by \$297,725.
- In the next year, with the depletion of the retained assets, the income is decreased.



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EstateView Inputs

General Info

Grantor's Age	-	60	+
Initial Assets	-	\$100,000,000	+
Annual Saving/Spending	-	(\$1,500,000)	+
Annual Growth Rate	-	6.00%	+
Income Tax Rate (Times Growth Amount)	-	30.00%	+
Lifetime Exemption Already Used	-	\$0	+

Sale/Note Info

Year One Gift	-	\$18,500,000	+	Year One Gift Discount Rate	-	35.00%	+
Sale Value before Discount	-	\$57,500,000	+	Discount Rate	-	35.00%	+
Sale Value after Discount	-	\$37,375,000	+	Note Amount (Equal to Sale Value after Discount Unless Grossed Up SCIN)	-	\$37,375,000	+
Note Interest Rate (AFR Unless Grossed Up for SCIN)	-	4.18%	+	Type of Note	☒ Conventional ☐ Self-Canceling		

[Go to SCIN Calculator to determine rate for self-canceling note.](#)

 Look Up AFR

Other Info

Estate Tax Rate	-	40.00%	+
Consumer Price Index Growth Rate	-	3.00%	+
Note Term (Number of Years until Balloon Payment)	-	20	+
Year to Toggle Off Grantor Trust Status	-	-1	+
Number of Years to Project	-	36	+

Grantor's Estate

Year	Age	Assets (w/ Note)	Assets (w/o Note)	After Tax Income on Retained Assets	Personal Consumption	Annual Note Payments Received	Income Tax on Trust Income	Taxable Estate	Estate Tax Savings Over No Planning
2024	60	\$100,000,000	\$0	\$0	\$0	\$0	\$0	\$100,000,000	\$0
2024	60	\$81,500,000	\$0	\$0	\$0	\$0	\$0	\$81,500,000	\$2,590,000
2024	60	\$61,375,000	\$24,000,000	\$0	\$0	\$0	\$0	\$61,375,000	\$10,640,000
2025	61	\$61,375,000	\$24,000,000	\$1,008,000	(\$1,500,000)	\$1,562,275	(\$1,368,000)	\$61,077,275	\$11,839,090
2026	62	\$61,077,275	\$23,702,275	\$995,496	(\$1,545,000)	\$1,562,275	(\$1,421,959)	\$60,668,087	\$15,036,125
2027	63	\$60,668,087	\$23,293,087	\$978,310	(\$1,591,350)	\$1,562,275	(\$1,479,156)	\$60,138,165	\$16,295,423
2028	64	\$60,138,165	\$22,763,165	\$956,053	(\$1,639,091)	\$1,562,275	(\$1,539,784)	\$59,477,619	\$17,635,558
2029	65	\$59,477,619	\$22,102,619	\$928,310	(\$1,688,263)	\$1,562,275	(\$1,604,050)	\$58,675,891	\$19,057,382
2030	66	\$58,675,891	\$21,300,891	\$894,637	(\$1,738,911)	\$1,562,275	(\$1,672,172)	\$57,721,720	\$20,566,035
2031	67	\$57,721,720	\$20,346,720	\$854,562	(\$1,791,078)	\$1,562,275	(\$1,744,382)	\$56,603,097	\$22,170,967
2032	68	\$56,603,097	\$19,228,097	\$807,580	(\$1,844,811)	\$1,562,275	(\$1,820,924)	\$55,307,218	\$23,869,955
2033	69	\$55,307,218	\$17,932,218	\$753,153	(\$1,900,155)	\$1,562,275	(\$1,902,058)	\$53,820,433	\$25,681,122
2034	70	\$53,820,433	\$16,445,433	\$690,708	(\$1,957,160)	\$1,562,275	(\$1,988,060)	\$52,128,196	\$27,598,959
2035	71	\$52,128,196	\$14,753,196	\$619,634	(\$2,015,875)	\$1,562,275	(\$2,079,223)	\$50,215,007	\$29,638,347
2036	72	\$50,215,007	\$12,840,007	\$539,280	(\$2,076,351)	\$1,562,275	(\$2,175,856)	\$48,064,356	\$31,798,578
2037	73	\$48,064,356	\$10,689,356	\$448,953	(\$2,138,641)	\$1,562,275	(\$2,278,286)	\$45,658,657	\$34,095,382
2038	74	\$45,658,657	\$8,283,657	\$347,914	(\$2,202,801)	\$1,562,275	(\$2,386,862)	\$42,979,182	\$36,532,955
2039	75	\$42,979,182	\$5,604,182	\$235,376	(\$2,268,885)	\$1,562,275	(\$2,501,953)	\$40,005,995	\$39,119,983
2040	76	\$40,005,995	\$2,630,995	\$110,502	(\$2,336,951)	\$1,562,275	(\$2,623,949)	\$36,717,872	\$41,865,672
2041	77	\$36,717,872	(\$657,128)	\$0	(\$2,407,060)	\$1,562,275	(\$2,753,265)	\$33,119,822	\$44,772,742
2042	78	\$33,119,822	(\$1,255,178)	\$0	(\$2,479,271)	\$1,562,275	(\$2,890,340)	\$29,312,485	\$47,793,669
2043	79	\$29,312,485	(\$1,862,515)	\$0	(\$2,553,650)	\$1,562,275	(\$3,035,640)	\$25,285,471	\$50,937,342
2044	80	\$25,285,471	(\$2,489,529)	\$0	(\$2,630,259)	\$38,937,275	(\$3,189,657)	\$21,027,830	\$54,314,883
2045	81	\$21,027,830	\$21,027,830	\$883,169	(\$2,709,167)	\$0	(\$2,680,166)	\$16,521,666	\$57,870,195
2046	82	\$16,521,666	\$16,521,666	\$693,910	(\$2,790,442)	\$0	(\$2,840,975)	\$11,584,159	\$61,639,153
2047	83	\$11,584,159	\$11,584,159	\$486,535	(\$2,874,155)	\$0	(\$3,011,434)	\$6,185,105	\$65,634,591
2048	84	\$6,185,105	\$6,185,105	\$259,774	(\$2,960,380)	\$0	(\$3,192,120)	\$292,379	\$69,265,064
2049	85	\$292,379	\$292,379	\$12,280	(\$3,049,191)	\$0	(\$3,383,647)	(\$6,128,179)	\$73,422,864
2050	86	(\$6,128,179)	(\$6,128,179)	\$0	(\$3,140,667)	\$0	(\$3,586,666)	(\$12,855,512)	\$77,816,789
2051	87	(\$12,855,512)	(\$12,855,512)	\$0	(\$3,234,887)	\$0	(\$3,801,866)	(\$19,892,265)	\$74,651,596
2052	88	(\$19,892,265)	(\$19,892,265)	\$0	(\$3,331,934)	\$0	(\$4,029,978)	(\$27,254,177)	\$76,528,037
2053	89	(\$27,254,177)	(\$27,254,177)	\$0	(\$3,431,892)	\$0	(\$4,271,777)	(\$34,957,845)	\$78,442,866
2054	90	(\$34,957,845)	(\$34,957,845)	\$0	(\$3,534,848)	\$0	(\$4,528,083)	(\$43,020,777)	\$80,400,831
2055	91	(\$43,020,777)	(\$43,020,777)	\$0	(\$3,640,894)	\$0	(\$4,799,768)	(\$51,461,439)	\$82,398,677
2056	92	(\$51,461,439)	(\$51,461,439)	\$0	(\$3,750,121)	\$0	(\$5,087,754)	(\$60,299,314)	\$84,441,141
2057	93	(\$60,299,314)	(\$60,299,314)	\$0	(\$3,862,624)	\$0	(\$5,393,020)	(\$69,554,957)	\$86,528,955
2058	94	(\$69,554,957)	(\$69,554,957)	\$0	(\$3,978,503)	\$0	(\$5,716,601)	(\$79,250,061)	\$88,654,842
2059	95	(\$79,250,061)	(\$79,250,061)	\$0	(\$4,097,858)	\$0	(\$6,059,597)	(\$89,407,516)	\$90,831,514
2060	96	(\$89,407,516)	(\$89,407,516)	\$0	(\$4,220,794)	\$0	(\$6,423,173)	(\$100,051,482)	\$93,047,673



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Grantor Trust							
Assets	Note Balance	Annual Income	Income Taxes Paid By Trust	Annual Note Payment	Net Assets	Year	Notes
\$0	\$0	\$0	\$0	\$0	\$0	2024	Initial Values
\$18,500,000	\$0	\$0	\$0	\$0	\$0	2024	Year One Gift to Trust
\$76,000,000	\$37,375,000	\$0	\$0	\$0	\$38,625,000	2024	Sale of Assets to Trust
\$76,000,000	\$37,375,000	\$4,560,000	\$0	(\$1,562,275)	\$41,622,725	2025	
\$78,997,725	\$37,375,000	\$4,739,864	\$0	(\$1,562,275)	\$44,800,314	2026	
\$82,175,314	\$37,375,000	\$4,930,519	\$0	(\$1,562,275)	\$48,168,557	2027	
\$85,543,557	\$37,375,000	\$5,132,613	\$0	(\$1,562,275)	\$51,738,896	2028	
\$89,113,896	\$37,375,000	\$5,346,834	\$0	(\$1,562,275)	\$55,523,454	2029	
\$92,898,454	\$37,375,000	\$5,573,907	\$0	(\$1,562,275)	\$59,535,087	2030	
\$96,910,087	\$37,375,000	\$5,814,605	\$0	(\$1,562,275)	\$63,787,417	2031	
\$101,162,417	\$37,375,000	\$6,069,745	\$0	(\$1,562,275)	\$68,294,887	2032	
\$105,669,887	\$37,375,000	\$6,340,193	\$0	(\$1,562,275)	\$73,072,805	2033	
\$110,447,805	\$37,375,000	\$6,626,868	\$0	(\$1,562,275)	\$78,137,399	2034	
\$115,512,399	\$37,375,000	\$6,930,744	\$0	(\$1,562,275)	\$83,505,867	2035	
\$120,880,867	\$37,375,000	\$7,252,852	\$0	(\$1,562,275)	\$89,196,444	2036	
\$126,571,444	\$37,375,000	\$7,594,287	\$0	(\$1,562,275)	\$95,228,456	2037	
\$132,603,456	\$37,375,000	\$7,956,207	\$0	(\$1,562,275)	\$101,622,389	2038	
\$138,997,389	\$37,375,000	\$8,339,843	\$0	(\$1,562,275)	\$108,399,957	2039	
\$145,774,957	\$37,375,000	\$8,746,497	\$0	(\$1,562,275)	\$115,584,179	2040	
\$152,959,179	\$37,375,000	\$9,177,551	\$0	(\$1,562,275)	\$123,199,455	2041	
\$160,574,455	\$37,375,000	\$9,634,467	\$0	(\$1,562,275)	\$131,271,647	2042	
\$168,646,647	\$37,375,000	\$10,118,799	\$0	(\$1,562,275)	\$139,828,171	2043	
\$177,203,171	\$0	\$10,632,190	\$0	(\$38,937,275)	\$148,898,086	2044	
\$148,898,086	\$0	\$8,933,885	\$0	\$0	\$157,831,972	2045	
\$157,831,972	\$0	\$9,469,918	\$0	\$0	\$167,301,890	2046	
\$167,301,890	\$0	\$10,038,113	\$0	\$0	\$177,340,003	2047	
\$177,340,003	\$0	\$10,640,400	\$0	\$0	\$187,980,403	2048	
\$187,980,403	\$0	\$11,278,824	\$0	\$0	\$199,259,228	2049	
\$199,259,228	\$0	\$11,955,554	\$0	\$0	\$211,214,781	2050	
\$211,214,781	\$0	\$12,672,887	\$0	\$0	\$223,887,668	2051	
\$223,887,668	\$0	\$13,433,260	\$0	\$0	\$237,320,928	2052	
\$237,320,928	\$0	\$14,239,256	\$0	\$0	\$251,560,184	2053	
\$251,560,184	\$0	\$15,093,611	\$0	\$0	\$266,653,795	2054	
\$266,653,795	\$0	\$15,999,228	\$0	\$0	\$282,653,023	2055	
\$282,653,023	\$0	\$16,959,181	\$0	\$0	\$299,612,204	2056	
\$299,612,204	\$0	\$17,976,732	\$0	\$0	\$317,588,936	2057	
\$317,588,936	\$0	\$19,055,336	\$0	\$0	\$336,644,273	2058	
\$336,644,273	\$0	\$20,198,656	\$0	\$0	\$356,842,929	2059	
\$356,842,929	\$0	\$21,410,576	\$0	\$0	\$378,253,505	2060	



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What Can Be Done To Reduce The “Burn?”

1. Tax reimbursement clauses. May not be practical as cannot use it every year.
2. Terminate grantor trust treatment for the trust after the note is paid in full. Can have it automatically occurred by a clause in the trust agreement as the trustee may not be willing to terminate because of the duty of loyalty to only the beneficiaries. Or bifurcate grantor trust into a grantor trust and a non-grantor trust.
3. A larger interest rate on the note up to 5.0% above the AFR. See section 163(i). If increase the interest rate, the additional interest covers the SCIN risk premium.
4. Invest some of the trust's assets in municipal bonds or assets that appreciate and that will not be sold while the grantor is living.
5. Invest trust assets in high cash value, low death benefit life insurance that does not produce taxable income.



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What Can Be Done To Reduce The “Burn?”

6. Distribute some of the trust’s income producing assets to the beneficiaries.
7. Use a private annuity sale to continue payments to grantor for life.
8. Invest trust assets in encumbered real estate to shelter taxable income with depreciation losses, such as bonus depreciation.
9. If Senior were married could use a SLAT so that trust distributions can be made to the grantor’s spouse (viable if the grantor’s spouse does not predecease the grantor).
10. Give the independent trustee the discretionary power to add the grantor as a beneficiary in a state like Nevada that has legislation that the grantor’s creditors cannot go after trust assets.
11. Prepay the note in whole or in part before maturity date.
12. Given that the discount is less significant than the burn, reduce the size of the valuation discount to say the 20% to 25 % that the IRS is more likely to accept and minimize the audit exposure.



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What Can Be Done To Reduce The “Burn?”

Alternative One – Reduce the Discount Rate to 30%

General Info

Grantor's Age

- 60 +

Initial Assets

- \$100,000,000 +

Annual Saving/Spending

- (\$1,500,000) +

Annual Growth Rate

- 6.00% +

Income Tax Rate (Times Growth Amount)

- 30.00% +

Lifetime Exemption Already Used

- \$0 +

Sale/Note Info

Year One Gift

- \$18,500,000 +

Sale Value before Discount

- \$57,500,000 +

Sale Value after Discount

- \$40,250,000 +

Note Interest Rate
(AFR Unless Grossed Up for SCIN)

- 4.18% +

Year One Gift Discount Rate

- 30.00% +

Discount Rate

- 30.00% +

Note Amount
(Equal to Sale Value after Discount Unless Grossed Up SCIN)

- \$40,250,000 +

Type of Note

☒ Conventional ☐ Self-Canceling

[Go to SCIN Calculator to determine rate for self-canceling note.](#)

Other Info

Estate Tax Rate

- 40.00% +

Consumer Price Index Growth Rate

- 3.00% +

Note Term
(Number of Years until Balloon Payment)

- 20 +

Year to Toggle Off Grantor Trust Status

- -1 +

Number of Years to Project

- 36 +

Look Up AFR

Grantor's Estate

Year	Age	Assets (w/ Note)	Assets (w/o Note)	After Tax Income on Retained Assets	Personal Consumption	Annual Note Payments Received	Income Tax on Trust Income	Taxable Estate	Estate Tax Savings Over No Planning
2024	60	\$100,000,000	\$0	\$0	\$0	\$0	\$0	\$100,000,000	\$0
2024	60	\$81,500,000	\$0	\$0	\$0	\$0	\$0	\$81,500,000	\$2,220,000
2024	60	\$64,250,000	\$24,000,000	\$0	\$0	\$0	\$0	\$64,250,000	\$9,120,000
2025	61	\$64,250,000	\$24,000,000	\$1,008,000	(\$1,500,000)	\$1,682,450	(\$1,368,000)	\$64,072,450	\$10,271,020
2026	62	\$64,072,450	\$23,822,450	\$1,000,543	(\$1,545,000)	\$1,682,450	(\$1,419,796)	\$63,790,647	\$13,787,101
2027	63	\$63,790,647	\$23,540,647	\$988,707	(\$1,591,350)	\$1,682,450	(\$1,474,700)	\$63,395,755	\$14,992,387
2028	64	\$63,395,755	\$23,145,755	\$972,122	(\$1,639,091)	\$1,682,450	(\$1,532,897)	\$62,878,338	\$16,275,271
2029	65	\$62,878,338	\$22,628,338	\$950,390	(\$1,688,263)	\$1,682,450	(\$1,594,587)	\$62,228,328	\$17,636,407
2030	66	\$62,228,328	\$21,978,328	\$923,090	(\$1,738,911)	\$1,682,450	(\$1,659,978)	\$61,434,979	\$19,080,731
2031	67	\$61,434,979	\$21,184,979	\$889,769	(\$1,791,078)	\$1,682,450	(\$1,729,293)	\$60,486,826	\$20,617,475
2032	68	\$60,486,826	\$20,236,826	\$849,947	(\$1,844,811)	\$1,682,450	(\$1,802,766)	\$59,371,646	\$22,244,184
2033	69	\$59,371,646	\$19,121,646	\$803,109	(\$1,900,155)	\$1,682,450	(\$1,880,648)	\$58,076,402	\$23,978,735
2034	70	\$58,076,402	\$17,826,402	\$748,709	(\$1,957,160)	\$1,682,450	(\$1,963,203)	\$56,587,198	\$25,815,359
2035	71	\$56,587,198	\$16,337,198	\$686,162	(\$2,015,875)	\$1,682,450	(\$2,050,711)	\$54,889,224	\$27,768,660
2036	72	\$54,889,224	\$14,639,224	\$614,847	(\$2,076,351)	\$1,682,450	(\$2,143,470)	\$52,966,701	\$29,837,640
2037	73	\$52,966,701	\$12,716,701	\$534,101	(\$2,138,641)	\$1,682,450	(\$2,241,794)	\$50,802,817	\$32,037,718
2038	74	\$50,802,817	\$10,552,817	\$443,218	(\$2,202,801)	\$1,682,450	(\$2,346,017)	\$48,379,668	\$34,372,761
2039	75	\$48,379,668	\$8,129,668	\$341,446	(\$2,268,885)	\$1,682,450	(\$2,456,494)	\$45,678,185	\$36,851,107
2040	76	\$45,678,185	\$5,428,185	\$227,984	(\$2,336,951)	\$1,682,450	(\$2,573,600)	\$42,678,068	\$39,481,593
2041	77	\$42,678,068	\$2,428,068	\$101,979	(\$2,407,060)	\$1,682,450	(\$2,697,732)	\$39,357,705	\$42,277,589
2042	78	\$39,357,705	(\$892,295)	\$0	(\$2,479,271)	\$1,682,450	(\$2,829,311)	\$35,731,573	\$45,226,034
2043	79	\$35,731,573	(\$4,518,427)	\$0	(\$2,553,650)	\$1,682,450	(\$2,968,786)	\$31,891,587	\$48,294,896
2044	80	\$31,891,587	(\$8,358,413)	\$0	(\$2,630,259)	\$41,932,450	(\$3,116,629)	\$27,827,149	\$51,489,156
2045	81	\$27,827,149	\$27,827,149	\$1,168,740	(\$2,709,167)	\$0	(\$2,548,843)	\$23,737,879	\$54,733,710
2046	82	\$23,737,879	\$23,737,879	\$996,991	(\$2,790,442)	\$0	(\$2,701,773)	\$19,242,655	\$58,205,755
2047	83	\$19,242,655	\$19,242,655	\$808,192	(\$2,874,155)	\$0	(\$2,863,880)	\$14,312,812	\$62,013,508
2048	84	\$14,312,812	\$14,312,812	\$601,138	(\$2,960,380)	\$0	(\$3,035,713)	\$8,917,857	\$66,049,921
2049	85	\$8,917,857	\$8,917,857	\$374,550	(\$3,049,191)	\$0	(\$3,217,855)	\$3,025,361	\$70,328,719
2050	86	\$3,025,361	\$3,025,361	\$127,065	(\$3,140,667)	\$0	(\$3,410,927)	(\$3,399,168)	\$72,816,789
2051	87	(\$3,399,168)	(\$3,399,168)	\$0	(\$3,234,887)	\$0	(\$3,615,582)	(\$10,249,637)	\$74,651,596
2052	88	(\$10,249,637)	(\$10,249,637)	\$0	(\$3,331,934)	\$0	(\$3,832,517)	(\$17,414,087)	\$76,528,037
2053	89	(\$17,414,087)	(\$17,414,087)	\$0	(\$3,431,892)	\$0	(\$4,062,468)	(\$24,908,447)	\$78,442,866
2054	90	(\$24,908,447)	(\$24,908,447)	\$0	(\$3,534,848)	\$0	(\$4,306,216)	(\$32,749,512)	\$80,400,831
2055	91	(\$32,749,512)	(\$32,749,512)	\$0	(\$3,640,894)	\$0	(\$4,564,589)	(\$40,954,995)	\$82,398,677
2056	92	(\$40,954,995)	(\$40,954,995)	\$0	(\$3,750,121)	\$0	(\$4,838,465)	(\$49,543,580)	\$84,441,141
2057	93	(\$49,543,580)	(\$49,543,580)	\$0	(\$3,862,624)	\$0	(\$5,128,772)	(\$58,534,976)	\$86,528,955
2058	94	(\$58,534,976)	(\$58,534,976)	\$0	(\$3,978,503)	\$0	(\$5,436,499)	(\$67,949,978)	\$88,654,842
2059	95	(\$67,949,978)	(\$67,949,978)	\$0	(\$4,097,858)	\$0	(\$5,762,689)	(\$77,810,525)	\$90,831,514
2060	96	(\$77,810,525)	(\$77,810,525)	\$0	(\$4,220,794)	\$0	(\$6,108,450)	(\$88,139,769)	\$93,047,673



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Grantor Trust

Assets	Note Balance	Annual Income	Income Tax on Trust Income	Annual Note Payment	Net Assets	Year	Notes
\$0	\$0	\$0	\$0	\$0	\$0	2024	Initial Values
\$18,500,000	\$0	\$0	\$0	\$0	\$0	2024	Year One Gift to Trust
\$76,000,000	\$40,250,000	\$0	\$0	\$0	\$35,750,000	2024	Sale of Assets to Trust
\$76,000,000	\$40,250,000	\$4,560,000	\$0	(\$1,682,450)	\$38,627,550	2025	
\$78,877,550	\$40,250,000	\$4,732,653	\$0	(\$1,682,450)	\$41,677,753	2026	
\$81,927,753	\$40,250,000	\$4,915,665	\$0	(\$1,682,450)	\$44,910,968	2027	
\$85,160,968	\$40,250,000	\$5,109,658	\$0	(\$1,682,450)	\$48,338,176	2028	
\$88,588,176	\$40,250,000	\$5,315,291	\$0	(\$1,682,450)	\$51,971,017	2029	
\$92,221,017	\$40,250,000	\$5,533,261	\$0	(\$1,682,450)	\$55,821,828	2030	
\$96,071,828	\$40,250,000	\$5,764,310	\$0	(\$1,682,450)	\$59,903,688	2031	
\$100,153,688	\$40,250,000	\$6,009,221	\$0	(\$1,682,450)	\$64,230,459	2032	
\$104,480,459	\$40,250,000	\$6,268,828	\$0	(\$1,682,450)	\$68,816,836	2033	
\$109,066,836	\$40,250,000	\$6,544,010	\$0	(\$1,682,450)	\$73,678,396	2034	
\$113,928,396	\$40,250,000	\$6,835,704	\$0	(\$1,682,450)	\$78,831,650	2035	
\$119,081,650	\$40,250,000	\$7,144,899	\$0	(\$1,682,450)	\$84,294,099	2036	
\$124,544,099	\$40,250,000	\$7,472,646	\$0	(\$1,682,450)	\$90,084,295	2037	
\$130,334,295	\$40,250,000	\$7,820,058	\$0	(\$1,682,450)	\$96,221,903	2038	
\$136,471,903	\$40,250,000	\$8,188,314	\$0	(\$1,682,450)	\$102,727,767	2039	
\$142,977,767	\$40,250,000	\$8,578,666	\$0	(\$1,682,450)	\$109,623,983	2040	
\$149,873,983	\$40,250,000	\$8,992,439	\$0	(\$1,682,450)	\$116,933,972	2041	
\$157,183,972	\$40,250,000	\$9,431,038	\$0	(\$1,682,450)	\$124,682,560	2042	
\$164,932,560	\$40,250,000	\$9,895,954	\$0	(\$1,682,450)	\$132,896,064	2043	
\$173,146,064	\$0	\$10,388,764	\$0	(\$41,932,450)	\$141,602,378	2044	
\$141,602,378	\$0	\$8,496,143	\$0	\$0	\$150,098,521	2045	
\$150,098,521	\$0	\$9,005,911	\$0	\$0	\$159,104,432	2046	
\$159,104,432	\$0	\$9,546,266	\$0	\$0	\$168,650,698	2047	
\$168,650,698	\$0	\$10,119,042	\$0	\$0	\$178,769,740	2048	
\$178,769,740	\$0	\$10,726,184	\$0	\$0	\$189,495,924	2049	
\$189,495,924	\$0	\$11,369,755	\$0	\$0	\$200,865,679	2050	
\$200,865,679	\$0	\$12,051,941	\$0	\$0	\$212,917,620	2051	
\$212,917,620	\$0	\$12,775,057	\$0	\$0	\$225,692,677	2052	
\$225,692,677	\$0	\$13,541,561	\$0	\$0	\$239,234,238	2053	
\$239,234,238	\$0	\$14,354,054	\$0	\$0	\$253,588,292	2054	
\$253,588,292	\$0	\$15,215,298	\$0	\$0	\$268,803,590	2055	
\$268,803,590	\$0	\$16,128,215	\$0	\$0	\$284,931,805	2056	
\$284,931,805	\$0	\$17,095,908	\$0	\$0	\$302,027,714	2057	
\$302,027,714	\$0	\$18,121,663	\$0	\$0	\$320,149,376	2058	
\$320,149,376	\$0	\$19,208,963	\$0	\$0	\$339,358,339	2059	
\$339,358,339	\$0	\$20,361,500	\$0	\$0	\$359,719,839	2060	

What Can Be Done To Reduce The “Burn?”

Alternative Two – Reduce the Discount Rate to 25%

General Info	
Grantor's Age	- 60 +
Initial Assets	- \$100,000,000 +
Annual Saving/Spending (\$1,500,000)	- (\$1,500,000) +
Annual Growth Rate	- 6.00% +
Income Tax Rate (Times Growth Amount)	- 30.00% +
Lifetime Exemption Already Used	- \$0 +

Sale/Note Info	
Year One Gift	- \$18,500,000 +
Year One Gift Discount Rate	- 25.00% +
Sale Value before Discount	- \$57,500,000 +
Discount Rate	- 25.00% +
Note Amount (Equal to Sale Value after Discount Unless Grossed Up SCIN)	- \$43,125,000 +
Sale Value after Discount	- \$43,125,000 +
Note Interest Rate (AFR Unless Grossed Up for SCIN)	- 4.18% +
Type of Note	☒ Conventional ☐ Self-Canceling

[Go to SCIN Calculator to determine rate for self-canceling note.](#)

Other Info	
Estate Tax Rate	- 40.00% +
Consumer Price Index Growth Rate	- 3.00% +
Note Term (Number of Years until Balloon Payment)	- 20 +
Year to Toggle Off Grantor Trust Status	- -1 +
Number of Years to Project	- 36 +

 Look Up AFR



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Grantor's Estate

Year	Age	Assets (w/ Note)	Assets (w/o Note)	After Tax Income on Retained Assets	Personal Consumption	Annual Note Payments Received	Income Tax on Trust Income	Taxable Estate	Estate Tax Savings Over No Planning
2024	60	\$ 100,000,000	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$100,000,000	\$ 0
2024	60	\$ 81,500,000	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$81,500,000	\$1,956,000
2024	60	\$ 67,125,000	\$ 24,000,000	\$ 0	\$ 0	\$ 0	\$ 0	\$67,125,000	\$7,706,000
2025	61	\$ 67,125,000	\$ 24,000,000	\$1,008,000	(\$1,500,000)	\$1,802,625	(\$1,368,000)	\$67,067,625	\$3,702,950
2026	62	\$ 67,067,625	\$ 23,942,625	\$1,005,590	(\$1,545,000)	\$1,802,625	(\$1,417,633)	\$66,913,208	\$12,538,077
2027	63	\$ 66,913,208	\$ 23,788,208	\$999,105	(\$1,591,350)	\$1,802,625	(\$1,470,243)	\$66,653,344	\$13,689,352
2028	64	\$ 66,653,344	\$ 23,528,344	\$988,190	(\$1,639,091)	\$1,802,625	(\$1,526,011)	\$66,279,058	\$14,914,983
2029	65	\$ 66,279,058	\$ 23,154,058	\$972,470	(\$1,688,263)	\$1,802,625	(\$1,585,124)	\$65,780,766	\$16,215,432
2030	66	\$ 65,780,766	\$ 22,655,766	\$951,542	(\$1,738,911)	\$1,802,625	(\$1,647,784)	\$65,148,237	\$17,595,428
2031	67	\$ 65,148,237	\$ 22,023,237	\$924,976	(\$1,791,078)	\$1,802,625	(\$1,714,204)	\$64,370,556	\$19,063,983
2032	68	\$ 64,370,556	\$ 21,245,556	\$892,313	(\$1,844,811)	\$1,802,625	(\$1,784,609)	\$63,436,074	\$20,618,412
2033	69	\$ 63,436,074	\$ 20,311,074	\$853,065	(\$1,900,155)	\$1,802,625	(\$1,859,239)	\$62,332,371	\$22,276,347
2034	70	\$ 62,332,371	\$ 19,207,371	\$806,710	(\$1,957,160)	\$1,802,625	(\$1,938,346)	\$61,046,200	\$24,031,758
2035	71	\$ 61,046,200	\$ 17,921,200	\$752,690	(\$2,015,875)	\$1,802,625	(\$2,022,199)	\$59,563,441	\$25,898,973
2036	72	\$ 59,563,441	\$ 16,438,441	\$690,415	(\$2,076,351)	\$1,802,625	(\$2,111,084)	\$57,869,046	\$27,876,702
2037	73	\$ 57,869,046	\$ 14,744,046	\$619,250	(\$2,138,641)	\$1,802,625	(\$2,159,302)	\$55,980,054	\$29,980,054
2038	74	\$ 55,946,978	\$ 12,821,978	\$538,523	(\$2,202,801)	\$1,802,625	(\$2,305,172)	\$53,780,153	\$32,212,567
2039	75	\$ 53,780,153	\$ 10,655,153	\$447,516	(\$2,268,885)	\$1,802,625	(\$2,411,036)	\$51,350,375	\$34,582,231
2040	76	\$ 51,350,375	\$ 8,225,375	\$345,466	(\$2,336,951)	\$1,802,625	(\$2,523,250)	\$48,638,264	\$37,097,515
2041	77	\$ 48,638,264	\$ 5,513,264	\$231,557	(\$2,407,060)	\$1,802,625	(\$2,642,198)	\$45,623,188	\$39,771,396
2042	78	\$ 45,623,188	\$ 2,498,188	\$104,924	(\$2,479,271)	\$1,802,625	(\$2,768,283)	\$42,283,183	\$42,605,389
2043	79	\$ 42,283,183	(\$ 841,817)	\$ 0	(\$2,553,650)	\$1,802,625	(\$2,901,933)	\$38,630,226	\$45,599,440
2044	80	\$ 38,630,226	(\$ 4,494,774)	\$ 0	(\$2,630,259)	\$44,927,625	(\$3,043,601)	\$34,758,991	\$48,716,419
2045	81	\$ 34,758,991	\$ 34,758,991	\$1,459,878	(\$2,709,167)	\$ 0	(\$2,417,520)	\$31,092,181	\$51,791,989
2046	82	\$ 31,092,181	\$ 31,092,181	\$1,305,872	(\$2,790,442)	\$ 0	(\$2,562,571)	\$27,045,040	\$55,052,801
2047	83	\$ 27,045,040	\$ 27,045,040	\$1,135,892	(\$2,874,155)	\$ 0	(\$2,716,326)	\$22,590,451	\$58,510,453
2048	84	\$ 22,590,451	\$ 22,590,451	\$948,799	(\$2,960,380)	\$ 0	(\$2,879,305)	\$17,699,565	\$62,185,238
2049	85	\$ 17,699,565	\$ 17,699,565	\$743,382	(\$3,049,191)	\$ 0	(\$3,052,063)	\$12,341,692	\$66,232,187
2050	86	\$ 12,341,692	\$ 12,341,692	\$518,351	(\$3,140,667)	\$ 0	(\$3,235,187)	\$6,484,189	\$70,541,114
2051	87	\$ 6,484,189	\$ 6,484,189	\$272,336	(\$3,234,887)	\$ 0	(\$3,429,298)	\$92,340	\$74,651,596
2052	88	\$ 92,340	\$ 92,340	\$3,878	(\$3,331,934)	\$ 0	(\$3,635,056)	(\$6,870,772)	\$78,528,037
2053	89	(\$ 6,870,772)	(\$ 6,870,772)	\$ 0	(\$3,431,892)	\$ 0	(\$3,853,160)	(\$14,155,823)	\$82,442,866
2054	90	(\$ 14,155,823)	(\$ 14,155,823)	\$ 0	(\$3,534,848)	\$ 0	(\$4,084,349)	(\$21,775,021)	\$86,400,831
2055	91	(\$ 21,775,021)	(\$ 21,775,021)	\$ 0	(\$3,640,894)	\$ 0	(\$4,329,410)	(\$29,745,324)	\$90,398,677
2056	92	(\$ 29,745,324)	(\$ 29,745,324)	\$ 0	(\$3,750,121)	\$ 0	(\$4,589,175)	(\$38,084,620)	\$94,441,141
2057	93	(\$ 38,084,620)	(\$ 38,084,620)	\$ 0	(\$3,862,624)	\$ 0	(\$4,864,525)	(\$46,811,769)	\$98,528,955
2058	94	(\$ 46,811,769)	(\$ 46,811,769)	\$ 0	(\$3,978,503)	\$ 0	(\$5,156,397)	(\$55,946,669)	\$102,654,842
2059	95	(\$ 55,946,669)	(\$ 55,946,669)	\$ 0	(\$4,097,858)	\$ 0	(\$5,465,781)	(\$65,510,308)	\$106,831,514
2060	96	(\$ 65,510,308)	(\$ 65,510,308)	\$ 0	(\$4,220,794)	\$ 0	(\$5,793,727)	(\$75,524,829)	\$111,047,673



Brandon Ketron, Esq.
Jerry Hesch, Esq.

Grantor Trust							
Assets	Note Balance	Annual Income	Income Tax on Trust Income	Annual Note Payment	Net Assets	Year	Notes
\$0	\$0	\$0	\$0	\$0	\$0	2024	Initial Values
\$18,500,000	\$0	\$0	\$0	\$0	\$0	2024	Year One Gift to Trust
\$76,000,000	\$43,125,000	\$0	\$0	\$0	\$32,875,000	2024	Sale of Assets to Trust
\$76,000,000	\$43,125,000	\$4,560,000	\$0	(\$1,802,625)	\$35,632,375	2025	
\$78,757,375	\$43,125,000	\$4,725,443	\$0	(\$1,802,625)	\$38,555,193	2026	
\$81,680,193	\$43,125,000	\$4,900,812	\$0	(\$1,802,625)	\$41,653,379	2027	
\$84,778,379	\$43,125,000	\$5,086,703	\$0	(\$1,802,625)	\$44,937,457	2028	
\$88,062,457	\$43,125,000	\$5,283,747	\$0	(\$1,802,625)	\$48,418,579	2029	
\$91,543,579	\$43,125,000	\$5,492,615	\$0	(\$1,802,625)	\$52,108,569	2030	
\$95,233,569	\$43,125,000	\$5,714,014	\$0	(\$1,802,625)	\$56,019,958	2031	
\$99,144,958	\$43,125,000	\$5,948,697	\$0	(\$1,802,625)	\$60,166,031	2032	
\$103,291,031	\$43,125,000	\$6,197,462	\$0	(\$1,802,625)	\$64,560,867	2033	
\$107,685,867	\$43,125,000	\$6,461,152	\$0	(\$1,802,625)	\$69,219,394	2034	
\$112,344,394	\$43,125,000	\$6,740,664	\$0	(\$1,802,625)	\$74,157,433	2035	
\$117,282,433	\$43,125,000	\$7,036,946	\$0	(\$1,802,625)	\$79,391,754	2036	
\$122,516,754	\$43,125,000	\$7,351,005	\$0	(\$1,802,625)	\$84,940,134	2037	
\$128,065,134	\$43,125,000	\$7,683,908	\$0	(\$1,802,625)	\$90,821,417	2038	
\$133,946,417	\$43,125,000	\$8,036,785	\$0	(\$1,802,625)	\$97,055,577	2039	
\$140,180,577	\$43,125,000	\$8,410,835	\$0	(\$1,802,625)	\$103,663,787	2040	
\$146,788,787	\$43,125,000	\$8,807,327	\$0	(\$1,802,625)	\$110,668,489	2041	
\$153,793,489	\$43,125,000	\$9,227,609	\$0	(\$1,802,625)	\$118,093,474	2042	
\$161,218,474	\$43,125,000	\$9,673,108	\$0	(\$1,802,625)	\$125,963,957	2043	
\$169,088,957	\$0	\$10,145,337	\$0	(\$44,927,625)	\$134,306,670	2044	
\$134,306,670	\$0	\$8,058,400	\$0	\$0	\$142,365,070	2045	
\$142,365,070	\$0	\$8,541,904	\$0	\$0	\$150,906,974	2046	
\$150,906,974	\$0	\$9,054,418	\$0	\$0	\$159,961,392	2047	
\$159,961,392	\$0	\$9,597,684	\$0	\$0	\$169,559,076	2048	
\$169,559,076	\$0	\$10,173,545	\$0	\$0	\$179,732,620	2049	
\$179,732,620	\$0	\$10,783,957	\$0	\$0	\$190,516,578	2050	
\$190,516,578	\$0	\$11,430,995	\$0	\$0	\$201,947,572	2051	
\$201,947,572	\$0	\$12,116,854	\$0	\$0	\$214,064,427	2052	
\$214,064,427	\$0	\$12,843,866	\$0	\$0	\$226,908,292	2053	
\$226,908,292	\$0	\$13,614,498	\$0	\$0	\$240,522,790	2054	
\$240,522,790	\$0	\$14,431,367	\$0	\$0	\$254,954,157	2055	
\$254,954,157	\$0	\$15,297,249	\$0	\$0	\$270,251,407	2056	
\$270,251,407	\$0	\$16,215,084	\$0	\$0	\$286,466,491	2057	
\$286,466,491	\$0	\$17,187,989	\$0	\$0	\$303,654,480	2058	
\$303,654,480	\$0	\$18,219,269	\$0	\$0	\$321,873,749	2059	
\$321,873,749	\$0	\$19,312,425	\$0	\$0	\$341,186,174	2060	



Brandon Ketron, Esq.
Jerry Hesck, Esq.

What Can Be Done To Reduce The “Burn?”

Alternative Three – Increase Interest Rate by 5% to 7.8%

General Info		Sale/Note Info		Other Info	
Grantor's Age	- 60 +	Year One Gift	- \$18,500,000 +	Year One Gift Discount Rate	- 35.00% +
Initial Assets	- \$100,000,000 +	Sale Value before Discount	- \$57,500,000 +	Discount Rate	- 35.00% +
Annual Saving/Spending	- (\$1,500,000) +	Note Amount	- \$37,375,000 +	Note Term	- 20 +
Annual Growth Rate	- 6.00% +	(Equal to Sale Value after Discount Unless Grossed Up SCIN)	- \$37,375,000 +	Year to Toggle Off Grantor Trust Status	- -1 +
Income Tax Rate (Times Growth Amount)	- 30.00% +	Note Interest Rate	- 7.80% +	Number of Years to Project	- 36 +
Lifetime Exemption Already Used	- \$0 +	(AFR Unless Grossed Up for SCIN)	- 7.80% +		
		Type of Note	- ☒ Conventional ☐ Self-Canceling		
		Go to SCIN Calculator to determine rate for self-canceling note.			
		Look Up AFR			



Brandon Ketron, Esq.
Jerry Hesche, Esq.

Grantor's Estate

Year	Age	Assets (w/ Note)	Assets (w/o Note)	After Tax Income on Retained Assets	Personal Consumption	Annual Note Payments Received	Income Tax on Trust Income	Taxable Estate	Estate Tax Savings Over No Planning
2024	60	\$ 100,000,000	\$ 0	\$0	\$0	\$0	\$0	\$100,000,000	\$ 0
2024	60	\$ 81,500,000	\$ 0	\$0	\$0	\$0	\$0	\$81,500,000	\$ 2,590,000
2024	60	\$ 61,375,000	\$ 24,000,000	\$0	\$0	\$0	\$0	\$61,375,000	\$ 10,640,000
2025	61	\$ 61,375,000	\$ 24,000,000	\$1,008,000	(\$1,500,000)	\$2,915,250	(\$1,368,000)	\$62,430,250	\$ 11,297,900
2026	62	\$ 62,430,250	\$ 25,055,250	\$1,052,321	(\$1,545,000)	\$2,915,250	(\$1,397,606)	\$63,455,215	\$ 13,921,274
2027	63	\$ 63,455,215	\$ 26,080,215	\$1,095,369	(\$1,591,350)	\$2,915,250	(\$1,428,987)	\$64,445,497	\$ 14,572,490
2028	64	\$ 64,445,497	\$ 27,070,497	\$1,136,961	(\$1,639,091)	\$2,915,250	(\$1,462,252)	\$65,396,365	\$ 15,268,060
2029	65	\$ 65,396,365	\$ 28,021,365	\$1,176,897	(\$1,688,263)	\$2,915,250	(\$1,497,513)	\$66,302,736	\$ 16,006,643
2030	66	\$ 66,302,736	\$ 28,927,736	\$1,214,965	(\$1,738,911)	\$2,915,250	(\$1,534,889)	\$67,159,151	\$ 16,791,062
2031	67	\$ 67,159,151	\$ 29,784,151	\$1,250,934	(\$1,791,078)	\$2,915,250	(\$1,574,508)	\$67,959,749	\$ 17,628,306
2032	68	\$ 67,959,749	\$ 30,584,749	\$1,284,559	(\$1,844,811)	\$2,915,250	(\$1,616,504)	\$68,698,244	\$ 18,513,544
2033	69	\$ 68,698,244	\$ 31,323,244	\$1,315,576	(\$1,900,155)	\$2,915,250	(\$1,661,019)	\$69,367,896	\$ 19,462,137
2034	70	\$ 69,367,896	\$ 31,992,896	\$1,343,702	(\$1,957,160)	\$2,915,250	(\$1,708,206)	\$69,961,482	\$ 20,465,645
2035	71	\$ 69,961,482	\$ 32,586,482	\$1,368,632	(\$2,015,875)	\$2,915,250	(\$1,758,224)	\$70,471,265	\$ 21,535,844
2036	72	\$ 70,471,265	\$ 33,096,265	\$1,390,043	(\$2,076,351)	\$2,915,250	(\$1,811,243)	\$70,888,965	\$ 22,668,734
2037	73	\$ 70,888,965	\$ 33,513,965	\$1,407,587	(\$2,138,641)	\$2,915,250	(\$1,867,443)	\$71,263,717	\$ 23,876,558
2038	74	\$ 71,205,717	\$ 33,830,717	\$1,420,890	(\$2,202,801)	\$2,915,250	(\$1,927,015)	\$71,412,041	\$ 25,159,812
2039	75	\$ 71,412,041	\$ 34,037,041	\$1,429,556	(\$2,268,885)	\$2,915,250	(\$1,990,162)	\$71,497,801	\$ 26,523,261
2040	76	\$ 71,497,801	\$ 34,122,801	\$1,433,158	(\$2,336,951)	\$2,915,250	(\$2,057,097)	\$71,452,161	\$ 27,971,956
2041	77	\$ 71,452,161	\$ 34,077,161	\$1,431,241	(\$2,407,060)	\$2,915,250	(\$2,128,048)	\$71,263,544	\$ 29,515,254
2042	78	\$ 71,263,544	\$ 33,888,544	\$1,423,319	(\$2,479,271)	\$2,915,250	(\$2,203,256)	\$70,919,585	\$ 31,150,829
2043	79	\$ 70,919,585	\$ 33,544,585	\$1,408,873	(\$2,553,650)	\$2,915,250	(\$2,282,977)	\$70,407,080	\$ 32,888,699
2044	80	\$ 70,407,080	\$ 33,032,080	\$1,387,347	(\$2,630,259)	\$40,290,250	(\$2,367,481)	\$69,711,937	\$ 34,841,240
2045	81	\$ 69,711,937	\$ 32,927,901	\$2,927,901	(\$2,709,167)	\$0	(\$1,784,306)	\$68,146,366	\$ 37,220,315
2046	82	\$ 68,146,366	\$ 68,146,366	\$2,862,147	(\$2,790,442)	\$0	(\$1,891,364)	\$66,326,707	\$ 39,742,134
2047	83	\$ 66,326,707	\$ 66,326,707	\$2,785,722	(\$2,874,155)	\$0	(\$2,004,846)	\$64,233,428	\$ 42,415,262
2048	84	\$ 64,233,428	\$ 64,233,428	\$2,697,804	(\$2,960,380)	\$0	(\$2,125,137)	\$61,845,715	\$ 45,248,778
2049	85	\$ 61,845,715	\$ 61,845,715	\$2,597,520	(\$3,049,191)	\$0	(\$2,252,645)	\$59,141,399	\$ 48,252,304
2050	86	\$ 59,141,399	\$ 59,141,399	\$2,483,939	(\$3,140,667)	\$0	(\$2,387,804)	\$56,096,867	\$ 51,436,042
2051	87	\$ 56,096,867	\$ 56,096,867	\$2,356,068	(\$3,234,887)	\$0	(\$2,531,072)	\$52,686,977	\$ 54,810,805
2052	88	\$ 52,686,977	\$ 52,686,977	\$2,212,853	(\$3,331,934)	\$0	(\$2,682,936)	\$48,884,960	\$ 58,388,053
2053	89	\$ 48,884,960	\$ 48,884,960	\$2,053,168	(\$3,431,892)	\$0	(\$2,843,912)	\$44,662,325	\$ 62,179,936
2054	90	\$ 44,662,325	\$ 44,662,325	\$1,875,818	(\$3,534,848)	\$0	(\$3,014,547)	\$39,988,747	\$ 66,199,333
2055	91	\$ 39,988,747	\$ 39,988,747	\$1,679,527	(\$3,640,894)	\$0	(\$3,195,420)	\$34,831,960	\$ 70,459,893
2056	92	\$ 34,831,960	\$ 34,831,960	\$1,462,942	(\$3,750,121)	\$0	(\$3,387,145)	\$29,157,637	\$ 74,976,086
2057	93	\$ 29,157,637	\$ 29,157,637	\$1,224,621	(\$3,862,624)	\$0	(\$3,590,374)	\$22,929,260	\$ 79,763,251
2058	94	\$ 22,929,260	\$ 22,929,260	\$963,029	(\$3,978,503)	\$0	(\$3,805,796)	\$16,107,990	\$ 84,837,646
2059	95	\$ 16,107,990	\$ 16,107,990	\$676,536	(\$4,097,858)	\$0	(\$4,034,144)	\$8,652,523	\$ 90,216,505
2060	96	\$ 8,652,523	\$ 8,652,523	\$363,406	(\$4,220,794)	\$0	(\$4,276,193)	\$518,943	\$ 93,047,673



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Using Financial Modeling to Explain the Estate Tax Benefits of
a Planning Technique and Evaluate the Grantor's Obligation
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Grantor Trust							
Assets	Note Balance	Annual Income	Income Tax on Trust Income	Annual Note Payment	Net Assets	Year	Notes
\$0	\$0	\$0	\$0	\$0	\$0	2024	Initial Values
\$18,500,000	\$0	\$0	\$0	\$0	\$0	2024	Year One Gift to Trust
\$76,000,000	\$37,375,000	\$0	\$0	\$0	\$38,625,000	2024	Sale of Assets to Trust
\$76,000,000	\$37,375,000	\$4,560,000	\$0	(\$2,915,250)	\$40,269,750	2025	
\$77,644,750	\$37,375,000	\$4,658,685	\$0	(\$2,915,250)	\$42,013,185	2026	
\$79,388,185	\$37,375,000	\$4,763,291	\$0	(\$2,915,250)	\$43,861,226	2027	
\$81,236,226	\$37,375,000	\$4,874,174	\$0	(\$2,915,250)	\$45,820,150	2028	
\$83,195,150	\$37,375,000	\$4,991,709	\$0	(\$2,915,250)	\$47,896,609	2029	
\$85,271,609	\$37,375,000	\$5,116,297	\$0	(\$2,915,250)	\$50,097,655	2030	
\$87,472,655	\$37,375,000	\$5,248,359	\$0	(\$2,915,250)	\$52,430,764	2031	
\$89,805,764	\$37,375,000	\$5,388,346	\$0	(\$2,915,250)	\$54,903,860	2032	
\$92,278,860	\$37,375,000	\$5,536,732	\$0	(\$2,915,250)	\$57,525,342	2033	
\$94,900,342	\$37,375,000	\$5,694,021	\$0	(\$2,915,250)	\$60,304,112	2034	
\$97,679,112	\$37,375,000	\$5,860,747	\$0	(\$2,915,250)	\$63,249,609	2035	
\$100,624,609	\$37,375,000	\$6,037,477	\$0	(\$2,915,250)	\$66,371,836	2036	
\$103,746,836	\$37,375,000	\$6,224,810	\$0	(\$2,915,250)	\$69,681,396	2037	
\$107,056,396	\$37,375,000	\$6,423,384	\$0	(\$2,915,250)	\$73,189,530	2038	
\$110,564,530	\$37,375,000	\$6,633,872	\$0	(\$2,915,250)	\$76,908,151	2039	
\$114,283,151	\$37,375,000	\$6,856,989	\$0	(\$2,915,250)	\$80,849,891	2040	
\$118,224,891	\$37,375,000	\$7,093,493	\$0	(\$2,915,250)	\$85,028,134	2041	
\$122,403,134	\$37,375,000	\$7,344,188	\$0	(\$2,915,250)	\$89,457,072	2042	
\$126,832,072	\$37,375,000	\$7,609,924	\$0	(\$2,915,250)	\$94,151,746	2043	
\$131,526,746	\$0	\$7,891,605	\$0	(\$40,290,250)	\$99,128,101	2044	
\$99,128,101	\$0	\$5,947,686	\$0	\$0	\$105,075,787	2045	
\$105,075,787	\$0	\$6,304,547	\$0	\$0	\$111,380,334	2046	
\$111,380,334	\$0	\$6,682,820	\$0	\$0	\$118,063,154	2047	
\$118,063,154	\$0	\$7,083,789	\$0	\$0	\$125,146,944	2048	
\$125,146,944	\$0	\$7,508,817	\$0	\$0	\$132,655,760	2049	
\$132,655,760	\$0	\$7,959,346	\$0	\$0	\$140,615,106	2050	
\$140,615,106	\$0	\$8,436,906	\$0	\$0	\$149,052,012	2051	
\$149,052,012	\$0	\$8,943,121	\$0	\$0	\$157,995,133	2052	
\$157,995,133	\$0	\$9,479,708	\$0	\$0	\$167,474,841	2053	
\$167,474,841	\$0	\$10,048,490	\$0	\$0	\$177,523,332	2054	
\$177,523,332	\$0	\$10,651,400	\$0	\$0	\$188,174,731	2055	
\$188,174,731	\$0	\$11,290,484	\$0	\$0	\$199,465,215	2056	
\$199,465,215	\$0	\$11,967,913	\$0	\$0	\$211,433,128	2057	
\$211,433,128	\$0	\$12,685,988	\$0	\$0	\$224,119,116	2058	
\$224,119,116	\$0	\$13,447,147	\$0	\$0	\$237,566,263	2059	
\$237,566,263	\$0	\$14,253,976	\$0	\$0	\$251,820,239	2060	



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Jerry Hesck, Esq.

What Can Be Done To Reduce The “Burn?”

Alternative Four – Turn Off Grantor Trust Status in Year 20 After Note is Repaid

General Info		
Grantor's Age	- 60 +	
Initial Assets	- \$100,000,000 +	
Annual Saving/Spending	- (\$1,500,000) +	
Annual Growth Rate	- 6.00% +	
Income Tax Rate (Times Growth Amount)	- 30.00% +	
Lifetime Exemption Already Used	- \$0 +	

Sale/Note Info			
Year One Gift	- \$18,500,000 +	Year One Gift Discount Rate	- 35.00% +
Sale Value before Discount	- \$57,500,000 +	Discount Rate	- 35.00% +
Sale Value after Discount	- \$37,375,000 +	Note Amount (Equal to Sale Value after Discount Unless Grossed Up SCIN)	- \$37,375,000 +
Note Interest Rate (AFR Unless Grossed Up for SCIN)	- 4.18% +	Type of Note	☒ Conventional ☐ Self-Canceling

[Go to SCIN Calculator to determine rate for self-canceling note.](#)

Other Info		
Estate Tax Rate	- 40.00% +	
Consumer Price Index Growth Rate	- 3.00% +	
Note Term (Number of Years until Balloon Payment)	- 20 +	
Year to Toggle Off Grantor Trust Status	- 20 +	
Number of Years to Project	- 36 +	

 Look Up AFR



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Grantor's Estate

Year	Age	Assets (w/ Note)	Assets (w/o Note)	After Tax Income on Retained Assets	Personal Consumption	Annual Note Payments Received	Income Tax on Trust Income	Taxable Estate	Estate Tax Savings Over No Planning
2024	60	\$100,000,000	\$0	\$0	\$0	\$0	\$0	\$100,000,000	\$0
2024	60	\$81,500,000	\$0	\$0	\$0	\$0	\$0	\$81,500,000	\$2,590,000
2024	60	\$61,375,000	\$24,000,000	\$0	\$0	\$0	\$0	\$61,375,000	\$10,640,000
2025	61	\$61,375,000	\$24,000,000	\$1,008,000	(\$1,500,000)	\$1,562,275	(\$1,368,000)	\$61,077,275	\$11,839,090
2026	62	\$61,077,275	\$23,702,275	\$995,496	(\$1,545,000)	\$1,562,275	(\$1,421,959)	\$60,668,087	\$15,036,125
2027	63	\$60,668,087	\$23,293,087	\$978,310	(\$1,591,350)	\$1,562,275	(\$1,479,156)	\$60,138,165	\$16,295,423
2028	64	\$60,138,165	\$22,763,165	\$956,053	(\$1,639,091)	\$1,562,275	(\$1,539,784)	\$59,477,619	\$17,635,558
2029	65	\$59,477,619	\$22,102,619	\$928,310	(\$1,688,263)	\$1,562,275	(\$1,604,050)	\$58,675,891	\$19,057,382
2030	66	\$58,675,891	\$21,300,891	\$894,637	(\$1,738,911)	\$1,562,275	(\$1,672,172)	\$57,721,720	\$20,566,035
2031	67	\$57,721,720	\$20,346,720	\$854,562	(\$1,791,078)	\$1,562,275	(\$1,744,382)	\$56,603,097	\$22,170,967
2032	68	\$56,603,097	\$19,228,097	\$807,580	(\$1,844,811)	\$1,562,275	(\$1,820,924)	\$55,307,218	\$23,869,955
2033	69	\$55,307,218	\$17,932,218	\$753,153	(\$1,900,155)	\$1,562,275	(\$1,902,058)	\$53,820,433	\$25,681,122
2034	70	\$53,820,433	\$16,445,433	\$690,708	(\$1,957,160)	\$1,562,275	(\$1,988,060)	\$52,128,196	\$27,598,959
2035	71	\$52,128,196	\$14,753,196	\$619,634	(\$2,015,875)	\$1,562,275	(\$2,079,223)	\$50,215,007	\$29,638,347
2036	72	\$50,215,007	\$12,840,007	\$539,280	(\$2,076,351)	\$1,562,275	(\$2,175,856)	\$48,064,356	\$31,798,578
2037	73	\$48,064,356	\$10,689,356	\$448,953	(\$2,138,641)	\$1,562,275	(\$2,278,286)	\$45,658,657	\$34,095,382
2038	74	\$45,658,657	\$8,283,657	\$347,914	(\$2,202,801)	\$1,562,275	(\$2,386,862)	\$42,979,182	\$36,532,955
2039	75	\$42,979,182	\$5,604,182	\$235,376	(\$2,268,885)	\$1,562,275	(\$2,501,953)	\$40,005,995	\$39,119,983
2040	76	\$40,005,995	\$2,630,995	\$110,502	(\$2,336,951)	\$1,562,275	(\$2,623,949)	\$36,717,872	\$41,865,672
2041	77	\$36,717,872	(\$657,128)	\$0	(\$2,407,060)	\$1,562,275	(\$2,753,265)	\$33,119,822	\$44,772,742
2042	78	\$33,119,822	(\$4,255,178)	\$0	(\$2,479,271)	\$1,562,275	(\$2,890,340)	\$29,312,485	\$47,793,669
2043	79	\$29,312,485	(\$8,062,515)	\$0	(\$2,553,650)	\$1,562,275	(\$3,035,640)	\$25,285,471	\$50,937,342
2044	80	\$25,285,471	(\$12,089,529)	\$0	(\$2,630,259)	\$38,937,275	(\$3,189,657)	\$21,027,830	\$54,314,883
2045	81	\$21,027,830	\$21,027,830	\$883,169	(\$2,709,167)	\$0	\$0	\$19,201,832	\$56,798,128
2046	82	\$19,201,832	\$19,201,832	\$806,477	(\$2,790,442)	\$0	\$0	\$17,217,867	\$59,385,670
2047	83	\$17,217,867	\$17,217,867	\$723,150	(\$2,874,155)	\$0	\$0	\$15,066,862	\$62,081,888
2048	84	\$15,066,862	\$15,066,862	\$632,808	(\$2,960,380)	\$0	\$0	\$12,739,291	\$64,891,347
2049	85	\$12,739,291	\$12,739,291	\$535,050	(\$3,049,191)	\$0	\$0	\$10,225,150	\$67,818,804
2050	86	\$10,225,150	\$10,225,150	\$429,456	(\$3,140,667)	\$0	\$0	\$7,513,939	\$70,869,214
2051	87	\$7,513,939	\$7,513,939	\$315,585	(\$3,234,887)	\$0	\$0	\$4,594,638	\$74,047,741
2052	88	\$4,594,638	\$4,594,638	\$192,975	(\$3,331,934)	\$0	\$0	\$1,455,679	\$76,528,037
2053	89	\$1,455,679	\$1,455,679	\$61,139	(\$3,431,892)	\$0	\$0	(\$1,915,074)	\$78,442,866
2054	90	(\$1,915,074)	(\$1,915,074)	\$0	(\$3,534,848)	\$0	\$0	(\$5,449,922)	\$80,400,831
2055	91	(\$5,449,922)	(\$5,449,922)	\$0	(\$3,640,894)	\$0	\$0	(\$9,090,816)	\$82,398,677
2056	92	(\$9,090,816)	(\$9,090,816)	\$0	(\$3,750,121)	\$0	\$0	(\$12,840,936)	\$84,441,141
2057	93	(\$12,840,936)	(\$12,840,936)	\$0	(\$3,862,624)	\$0	\$0	(\$16,703,560)	\$86,528,955
2058	94	(\$16,703,560)	(\$16,703,560)	\$0	(\$3,978,503)	\$0	\$0	(\$20,682,063)	\$88,654,842
2059	95	(\$20,682,063)	(\$20,682,063)	\$0	(\$4,097,858)	\$0	\$0	(\$24,779,921)	\$90,831,514
2060	96	(\$24,779,921)	(\$24,779,921)	\$0	(\$4,220,794)	\$0	\$0	(\$29,000,715)	\$93,047,673



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Using Financial Modeling to Explain the Estate Tax Benefits of
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Grantor Trust							
Assets	Note Balance	Annual Income	Income Tax on Trust Income	Annual Note Payment	Net Assets	Year	Notes
\$0	\$0	\$0	\$0	\$0	\$0	2024	Initial Values
\$18,500,000	\$0	\$0	\$0	\$0	\$0	2024	Year One Gift to Trust
\$76,000,000	\$37,375,000	\$0	\$0	\$0	\$38,625,000	2024	Sale of Assets to Trust
\$76,000,000	\$37,375,000	\$4,560,000	\$0	(\$1,562,275)	\$41,622,725	2025	
\$78,997,725	\$37,375,000	\$4,739,864	\$0	(\$1,562,275)	\$44,800,314	2026	
\$82,175,314	\$37,375,000	\$4,930,519	\$0	(\$1,562,275)	\$48,168,557	2027	
\$85,543,557	\$37,375,000	\$5,132,613	\$0	(\$1,562,275)	\$51,738,896	2028	
\$89,113,896	\$37,375,000	\$5,346,834	\$0	(\$1,562,275)	\$55,523,454	2029	
\$92,898,454	\$37,375,000	\$5,573,907	\$0	(\$1,562,275)	\$59,535,087	2030	
\$96,910,087	\$37,375,000	\$5,814,605	\$0	(\$1,562,275)	\$63,787,417	2031	
\$101,162,417	\$37,375,000	\$6,069,745	\$0	(\$1,562,275)	\$68,294,887	2032	
\$105,669,887	\$37,375,000	\$6,340,193	\$0	(\$1,562,275)	\$73,072,805	2033	
\$110,447,805	\$37,375,000	\$6,626,868	\$0	(\$1,562,275)	\$78,137,399	2034	
\$115,512,399	\$37,375,000	\$6,930,744	\$0	(\$1,562,275)	\$83,505,867	2035	
\$120,880,867	\$37,375,000	\$7,252,852	\$0	(\$1,562,275)	\$89,196,444	2036	
\$126,571,444	\$37,375,000	\$7,594,287	\$0	(\$1,562,275)	\$95,228,456	2037	
\$132,603,456	\$37,375,000	\$7,956,207	\$0	(\$1,562,275)	\$101,622,389	2038	
\$138,997,389	\$37,375,000	\$8,339,843	\$0	(\$1,562,275)	\$108,399,957	2039	
\$145,774,957	\$37,375,000	\$8,746,497	\$0	(\$1,562,275)	\$115,584,179	2040	
\$152,959,179	\$37,375,000	\$9,177,551	\$0	(\$1,562,275)	\$123,199,455	2041	
\$160,574,455	\$37,375,000	\$9,634,467	\$0	(\$1,562,275)	\$131,271,647	2042	
\$168,646,647	\$37,375,000	\$10,118,799	\$0	(\$1,562,275)	\$139,828,171	2043	
\$177,203,171	\$0	\$10,632,190	\$0	(\$38,937,275)	\$148,898,086	2044	
\$148,898,086	\$0	\$8,933,885	(\$2,680,166)	\$0	\$155,151,806	2045	
\$155,151,806	\$0	\$9,309,108	(\$2,792,733)	\$0	\$161,668,182	2046	
\$161,668,182	\$0	\$9,700,091	(\$2,910,027)	\$0	\$168,458,246	2047	
\$168,458,246	\$0	\$10,107,495	(\$3,032,248)	\$0	\$175,533,492	2048	
\$175,533,492	\$0	\$10,532,010	(\$3,159,603)	\$0	\$182,905,898	2049	
\$182,905,898	\$0	\$10,974,354	(\$3,292,306)	\$0	\$190,587,946	2050	
\$190,587,946	\$0	\$11,435,277	(\$3,430,583)	\$0	\$198,592,640	2051	
\$198,592,640	\$0	\$11,915,558	(\$3,574,668)	\$0	\$206,933,531	2052	
\$206,933,531	\$0	\$12,416,012	(\$3,724,804)	\$0	\$215,624,739	2053	
\$215,624,739	\$0	\$12,937,484	(\$3,881,245)	\$0	\$224,680,978	2054	
\$224,680,978	\$0	\$13,480,859	(\$4,044,258)	\$0	\$234,117,579	2055	
\$234,117,579	\$0	\$14,047,055	(\$4,214,116)	\$0	\$243,950,518	2056	
\$243,950,518	\$0	\$14,637,031	(\$4,391,109)	\$0	\$254,196,439	2057	
\$254,196,439	\$0	\$15,251,786	(\$4,575,536)	\$0	\$264,872,690	2058	
\$264,872,690	\$0	\$15,892,361	(\$4,767,708)	\$0	\$275,997,343	2059	
\$275,997,343	\$0	\$16,559,841	(\$4,967,952)	\$0	\$287,589,231	2060	



Brandon Ketron, Esq.
Jerry Hesck, Esq.

What Can Be Done To Reduce The “Burn?”

Alternative Five – Retain Additional Assets

\$50,000,000 Retained

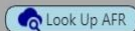
General Info		
Grantor's Age		
-	60	+
Initial Assets		
-	\$100,000,000	+
Annual Saving/Spending		
-	(\$1,500,000)	+
Annual Growth Rate		
-	6.00%	+
Income Tax Rate (Times Growth Amount)		
-	30.00%	+
Lifetime Exemption Already Used		
-	\$0	+

Sale/Note Info

Year One Gift		Year One Gift Discount Rate	
-	\$18,500,000	+	35.00%
Sale Value before Discount		Discount Rate	
-	\$31,500,000	+	35.00%
Sale Value after Discount		Note Amount (Equal to Sale Value after Discount Unless Grossed Up SCIN)	
-	\$20,475,000	+	\$20,475,000
Note Interest Rate (AFR Unless Grossed Up for SCIN)		Type of Note	
-	4.18%	+	☒ Conventional ☐ Self-Canceling

[Go to SCIN Calculator to determine rate for self-canceling note.](#)

<i>Other Info</i>		
Estate Tax Rate		
-	40.00%	+
Consumer Price Index Growth Rate		
-	3.00%	+
Note Term		
(Number of Years until Balloon Payment)		
-	20	+
Year to Toggle Off Grantor Trust Status		
-	-1	+
Number of Years to Project		
-	36	+



Grantor's Estate

Year	Age	Assets (w/ Note)	Assets (w/o Note)	After Tax Income on Retained Assets	Personal Consumption	Annual Note Payments Received	Income Tax on Trust Income	Taxable Estate	Estate Tax Savings Over No Planning
2024	60	\$100,000,000	\$0	\$0	\$0	\$0	\$0	\$100,000,000	\$ 0
2024	60	\$81,500,000	\$0	\$0	\$0	\$0	\$0	\$81,500,000	\$ 2,590,000
2024	60	\$70,475,000	\$50,000,000	\$0	\$0	\$0	\$0	\$70,475,000	\$ 7,000,000
2025	61	\$70,475,000	\$50,000,000	\$2,100,000	(\$1,500,000)	\$855,855	(\$900,000)	\$71,030,855	\$ 7,857,658
2026	62	\$71,030,855	\$50,555,855	\$2,123,346	(\$1,545,000)	\$855,855	(\$938,595)	\$71,526,461	\$ 10,692,775
2027	63	\$71,526,461	\$51,051,461	\$2,144,161	(\$1,591,350)	\$855,855	(\$979,505)	\$71,955,623	\$ 11,568,440
2028	64	\$71,955,623	\$51,480,623	\$2,162,186	(\$1,639,091)	\$855,855	(\$1,022,870)	\$72,311,704	\$ 12,501,924
2029	65	\$72,311,704	\$51,836,704	\$2,177,142	(\$1,688,263)	\$855,855	(\$1,068,837)	\$72,587,600	\$ 13,492,698
2030	66	\$72,587,600	\$52,112,600	\$2,188,729	(\$1,738,911)	\$855,855	(\$1,117,561)	\$72,775,712	\$ 14,544,438
2031	67	\$72,775,712	\$52,300,712	\$2,196,630	(\$1,791,078)	\$855,855	(\$1,169,210)	\$72,867,909	\$ 15,665,042
2032	68	\$72,867,909	\$52,392,909	\$2,200,502	(\$1,844,811)	\$855,855	(\$1,223,957)	\$72,855,498	\$ 16,850,643
2033	69	\$72,855,498	\$52,380,498	\$2,199,981	(\$1,900,155)	\$855,855	(\$1,281,989)	\$72,729,190	\$ 18,117,619
2034	70	\$72,729,190	\$52,254,190	\$2,194,676	(\$1,957,160)	\$855,855	(\$1,343,503)	\$72,479,059	\$ 19,458,614
2035	71	\$72,479,059	\$52,004,059	\$2,184,170	(\$2,015,875)	\$855,855	(\$1,408,708)	\$72,094,502	\$ 20,886,549
2036	72	\$72,094,502	\$51,619,502	\$2,168,019	(\$2,076,351)	\$855,855	(\$1,477,825)	\$71,564,200	\$ 22,398,640
2037	73	\$71,564,200	\$51,089,200	\$2,145,746	(\$2,138,641)	\$855,855	(\$1,551,089)	\$70,876,072	\$ 24,008,416
2038	74	\$70,876,072	\$50,401,072	\$2,116,845	(\$2,202,801)	\$855,855	(\$1,628,749)	\$70,017,222	\$ 25,717,739
2039	75	\$70,017,222	\$49,542,222	\$2,080,773	(\$2,268,885)	\$855,855	(\$1,711,068)	\$68,973,898	\$ 27,532,822
2040	76	\$68,973,898	\$48,498,898	\$2,036,954	(\$2,336,951)	\$855,855	(\$1,798,327)	\$67,731,428	\$ 29,460,249
2041	77	\$67,731,428	\$47,256,428	\$1,984,770	(\$2,407,060)	\$855,855	(\$1,890,821)	\$66,274,173	\$ 31,511,002
2042	78	\$66,274,173	\$45,799,173	\$1,923,565	(\$2,479,271)	\$855,855	(\$1,988,865)	\$64,585,456	\$ 33,684,480
2043	79	\$64,585,456	\$44,110,456	\$1,852,639	(\$2,553,650)	\$855,855	(\$2,092,792)	\$62,647,509	\$ 35,992,527
2044	80	\$62,647,509	\$42,172,509	\$1,771,245	(\$2,630,259)	\$21,330,855	(\$2,202,954)	\$60,441,397	\$ 38,549,457
2045	81	\$60,441,397	\$60,441,397	\$2,538,539	(\$2,709,167)	\$0	(\$1,951,176)	\$58,319,593	\$ 41,151,024
2046	82	\$58,319,593	\$58,319,593	\$2,449,423	(\$2,790,442)	\$0	(\$2,068,246)	\$55,910,328	\$ 43,908,685
2047	83	\$55,910,328	\$55,910,328	\$2,348,234	(\$2,874,155)	\$0	(\$2,192,341)	\$53,192,066	\$ 46,831,807
2048	84	\$53,192,066	\$53,192,066	\$2,234,067	(\$2,960,380)	\$0	(\$2,323,881)	\$50,141,872	\$ 49,930,315
2049	85	\$50,141,872	\$50,141,872	\$2,105,959	(\$3,049,191)	\$0	(\$2,463,314)	\$46,735,325	\$ 53,214,734
2050	86	\$46,735,325	\$46,735,325	\$1,962,884	(\$3,140,667)	\$0	(\$2,611,113)	\$42,946,429	\$ 56,696,218
2051	87	\$42,946,429	\$42,946,429	\$1,803,750	(\$3,234,887)	\$0	(\$2,767,780)	\$38,747,512	\$ 60,386,591
2052	88	\$38,747,512	\$38,747,512	\$1,627,396	(\$3,331,934)	\$0	(\$2,933,847)	\$34,109,127	\$ 64,298,386
2053	89	\$34,109,127	\$34,109,127	\$1,432,583	(\$3,431,892)	\$0	(\$3,109,877)	\$28,999,942	\$ 68,444,890
2054	90	\$28,999,942	\$28,999,942	\$1,217,998	(\$3,534,848)	\$0	(\$3,296,470)	\$23,386,621	\$ 72,840,183
2055	91	\$23,386,621	\$23,386,621	\$982,238	(\$3,640,894)	\$0	(\$3,494,258)	\$17,233,707	\$ 77,499,194
2056	92	\$17,233,707	\$17,233,707	\$723,816	(\$3,750,121)	\$0	(\$3,703,914)	\$10,503,489	\$ 82,437,746
2057	93	\$10,503,489	\$10,503,489	\$441,147	(\$3,862,624)	\$0	(\$3,926,149)	\$3,155,862	\$ 86,528,955
2058	94	\$3,155,862	\$3,155,862	\$132,546	(\$3,978,503)	\$0	(\$4,161,717)	(\$4,851,812)	\$ 88,654,842
2059	95	(\$4,851,812)	(\$4,851,812)	\$0	(\$4,097,858)	\$0	(\$4,411,421)	(\$13,361,090)	\$ 90,831,514
2060	96	(\$13,361,090)	(\$13,361,090)	\$0	(\$4,220,794)	\$0	(\$4,676,106)	(\$22,257,990)	\$ 93,047,673



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Grantor Trust							
Assets	Note Balance	Annual Income	Income Tax on Trust Income	Annual Note Payment	Net Assets	Year	Notes
\$0	\$0	\$0	\$0	\$0	\$0	2024	Initial Values
\$18,500,000	\$0	\$0	\$0	\$0	\$0	2024	Year One Gift to Trust
\$50,000,000	\$20,475,000	\$0	\$0	\$0	\$29,525,000	2024	Sale of Assets to Trust
\$50,000,000	\$20,475,000	\$3,000,000	\$0	(\$855,855)	\$31,669,145	2025	
\$52,144,145	\$20,475,000	\$3,128,649	\$0	(\$855,855)	\$33,941,939	2026	
\$54,416,939	\$20,475,000	\$3,265,016	\$0	(\$855,855)	\$36,351,100	2027	
\$56,826,100	\$20,475,000	\$3,409,566	\$0	(\$855,855)	\$38,904,811	2028	
\$59,379,811	\$20,475,000	\$3,562,789	\$0	(\$855,855)	\$41,611,745	2029	
\$62,086,745	\$20,475,000	\$3,725,205	\$0	(\$855,855)	\$44,481,094	2030	
\$64,956,094	\$20,475,000	\$3,897,366	\$0	(\$855,855)	\$47,522,605	2031	
\$67,997,605	\$20,475,000	\$4,079,856	\$0	(\$855,855)	\$50,746,606	2032	
\$71,221,606	\$20,475,000	\$4,273,296	\$0	(\$855,855)	\$54,164,048	2033	
\$74,639,048	\$20,475,000	\$4,478,343	\$0	(\$855,855)	\$57,786,536	2034	
\$78,261,536	\$20,475,000	\$4,695,692	\$0	(\$855,855)	\$61,626,373	2035	
\$82,101,373	\$20,475,000	\$4,926,082	\$0	(\$855,855)	\$65,696,600	2036	
\$86,171,600	\$20,475,000	\$5,170,296	\$0	(\$855,855)	\$70,011,041	2037	
\$90,486,041	\$20,475,000	\$5,429,162	\$0	(\$855,855)	\$74,584,349	2038	
\$95,059,349	\$20,475,000	\$5,703,561	\$0	(\$855,855)	\$79,432,054	2039	
\$99,907,054	\$20,475,000	\$5,994,423	\$0	(\$855,855)	\$84,570,623	2040	
\$105,045,623	\$20,475,000	\$6,302,737	\$0	(\$855,855)	\$90,017,505	2041	
\$110,492,505	\$20,475,000	\$6,629,550	\$0	(\$855,855)	\$95,791,200	2042	
\$116,266,200	\$20,475,000	\$6,975,972	\$0	(\$855,855)	\$101,911,317	2043	
\$122,386,317	\$0	\$7,343,179	\$0	(\$21,330,855)	\$108,398,641	2044	
\$108,398,641	\$0	\$6,503,918	\$0	\$0	\$114,902,560	2045	
\$114,902,560	\$0	\$6,894,154	\$0	\$0	\$121,796,714	2046	
\$121,796,714	\$0	\$7,307,803	\$0	\$0	\$129,104,516	2047	
\$129,104,516	\$0	\$7,746,271	\$0	\$0	\$136,850,787	2048	
\$136,850,787	\$0	\$8,211,047	\$0	\$0	\$145,061,835	2049	
\$145,061,835	\$0	\$8,703,710	\$0	\$0	\$153,765,545	2050	
\$153,765,545	\$0	\$9,225,933	\$0	\$0	\$162,991,477	2051	
\$162,991,477	\$0	\$9,779,489	\$0	\$0	\$172,770,966	2052	
\$172,770,966	\$0	\$10,366,258	\$0	\$0	\$183,137,224	2053	
\$183,137,224	\$0	\$10,988,233	\$0	\$0	\$194,125,457	2054	
\$194,125,457	\$0	\$11,647,527	\$0	\$0	\$205,772,985	2055	
\$205,772,985	\$0	\$12,346,379	\$0	\$0	\$218,119,364	2056	
\$218,119,364	\$0	\$13,087,162	\$0	\$0	\$231,206,526	2057	
\$231,206,526	\$0	\$13,872,392	\$0	\$0	\$245,078,917	2058	
\$245,078,917	\$0	\$14,704,735	\$0	\$0	\$259,783,652	2059	
\$259,783,652	\$0	\$15,587,019	\$0	\$0	\$275,370,671	2060	



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Jerry Hesck, Esq.

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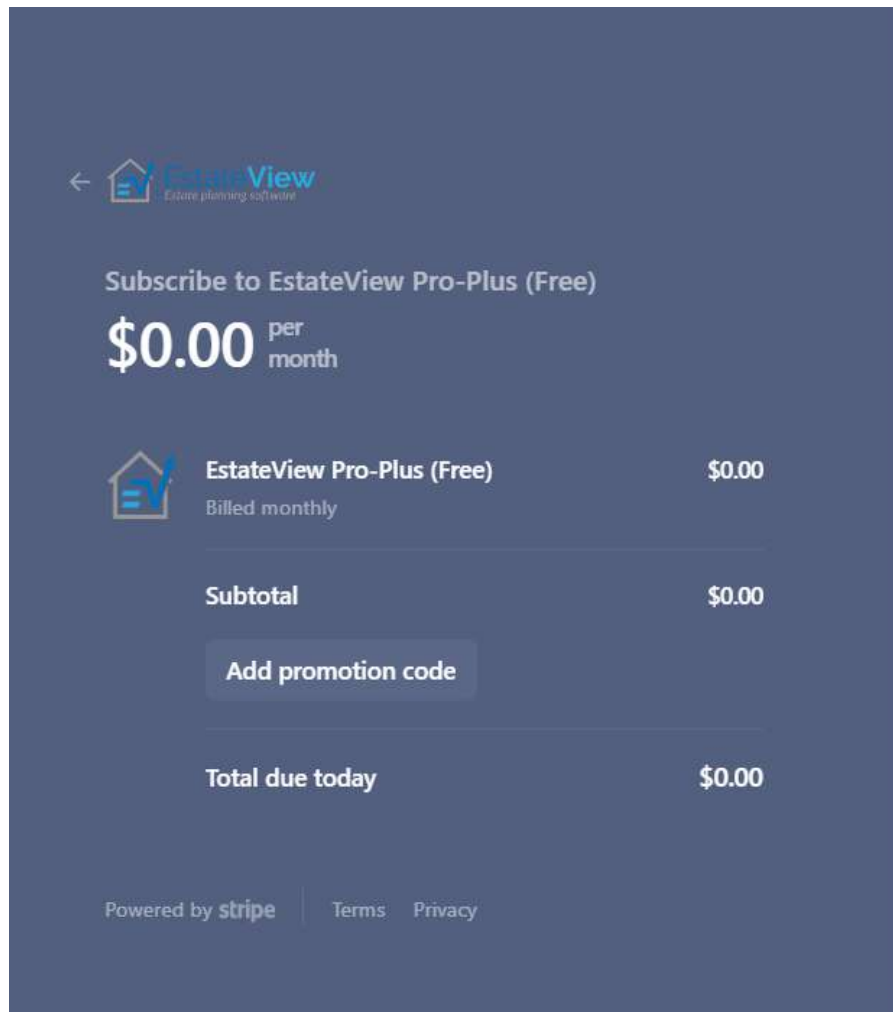
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