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# **Executive Summary**

- This is an illustration of a Charitable Remainder Annuity Trust (CRAT), which involves the creation of a lifetime Trust with a gift of \$20,000,000, which will pay the Grantor 5.00% annually (\$1,000,000) for the longer of the lives of Bob (age 70) and Mary (age N/A).
- The Internal Revenue Code expressly provides for each Grantor to make a gift of a remainder interest in property in the form of a CRAT, while retaining a qualified retained annual payment right.
- In this case, the Grantor receives **annual** payments, for a specified number of years, based upon a percentage of the initial fair market value of the assets placed in trust. Additionally, the gift to the Trust will usually generate an income tax charitable deduction for the Grantor.
- The slide entitled "CRAT Details," projects the income tax savings and some other financial numbers on a yearly basis for **a term of 19 years** years.





#### Important Characteristics of CRATs, CRUTs, and NIMCRUTs

	CRAT	CRUT	Flip-NIMCRUT
Minimum Annual Payment	Yes	No 👎	No 🖣
Pays Greater Amounts if Values Increase	No	Yes	Yes
Annual Valuations Required *If there is an independent Trustee, real estate (and other non-marketable assets) may be valued by the Trustee instead of by a current qualified appraisal.	No	Yes	Yes
Payments Can Be Deferred (NIMCRUT and Flip-NIMCRUT)	No	No	Yes
<b>"5% Probability of</b> Exhaustion Test" Applies	Yes 🖣	Yes	No
10% Minimum Remainder Requirement	Yes 🖣	Yes 📲	Yes



# **Assumptions Overview**

Transfer Date:	10/19/2024	Payout Rate:	5.00%
Highest Available § 7520 Rate:	5.20%		
Number of Lives:	One	Annual Growth Rate:	5.20%
Grantor Age (Nearest	70		
Birthday):		Income Tax Rate:	37.00%
2nd Life Age (Nearest Birthday):	N/A		
Table Life Expectancy:	15.4	Trust Value:	\$20,000,000
Term of CRAT:	19 years	Time Value of Money,	6.20%
Grantor Yr of Death:	89	Illustration, Rate:	
2nd Life Yr of Death:	N/A		
Mortality Table:	Table2010CM		









Donor transfers \$20,000,000 assets to CRAT and receives income tax charitable deduction of approximately \$8,109,257. The Donor may also receive a gift tax charitable deduction if the contribution is considered to be a completed gift. Note that the gift is not complete if the Donor retains the right to change the charity with the remainder interest.

Assets may include:

- Cash
- Stocks & Bonds
- Real Estate

Not suitable for:

• Property subject to debt (unless the debt or the Grantor's liability for the debt is removed before the transfer)

<u>Note regarding valuations:</u> If unmarketable assets are transferred, the annual valuation must be performed by either an independent trustee or a qualified appraisal from a qualified appraiser. Therefore, if unmarketable assets are transferred to the trust it is likely advisable to select an independent trustee to avoid the annual costs associated with hiring an appraiser.

Trust makes payments of a fixed annual (semi annual, quarterly or monthly) dollar amount of \$1,000,000 to the Donor or other non-charitable beneficiaries for Donor's lifetime or a term of a term of 19 years years.

The total payments to the Donor or other noncharitable beneficiaries are projected to be \$19,797,260.

The CRAT is a tax-exempt entity and does not pay tax on the gain from the sale of an appreciated asset. But be aware that CRATs are subject to the 100% tax on unrelated business taxable income.

Beneficiaries are taxed on distributions from the trust. The income from the trust is considered to come out "worst-first," with distributions meaning from the highest tax-rate class first.





The Remainder Value is projected to be **\$21,246,697** which is transferred directly to one or more charities.



allowed.

0.00%.

The probability of exhaustion is



CRAT is funded after death of Grantor with specific or residual estate assets worth **\$20,000,000**. The Estate of Donor receives an estate tax charitable deduction of approximately **\$8,109,257**.

Assets may include:

- Cash
- Stocks & Bonds
- Real Estate

Not suitable for:

• Property subject to debt (unless the debt or the Estate's liability for the debt is removed before the transfer)

Note regarding valuations: If unmarketable assets are transferred, the annual valuation must be performed by either an independent trustee or a qualified appraisal from a qualified appraiser. Therefore, if unmarketable assets are transferred to the trust it is likely advisable to select an independent trustee to avoid the annual costs associated with hiring an appraiser. Trust makes payments of a **5.00%** fixed percentage of the net fair market value of the property under the trust, valued and paid **Term**, to non-charitable beneficiaries for a term of **19 years**.

The total payments to non-charitable beneficiaries are projected to be **\$19,797,260**.

The CRAT is a tax-exempt entity and does not pay tax on the gain from the sale of an appreciated asset. But be aware that CRATs are subject to the 100% tax on unrelated business taxable income.

Beneficiaries are taxed on distributions from the trust. The income from the trust is considered to come out "worst-first" with distributions, meaning from the highest tax-rate class first.

The remaining assets after the payment term are transferred to charity or charities.







## **CRAT Summary**

CRAT #II <th></th>											
In the second of the second o	CRAT #		Те	rm of CRAT	Number	of Lives		Grantor	Age	S	Survivor Age
IRS Table Life ExpectancyYear of DeathActual Life ExpectancyGrowth RateTotal Annuity PaymentsIllustrated End ValueYear 1 Income Tax Savings15.4 $Year'$ $Actual LifeExpectancyGrowth RateTotalAnnuityPaymentsIllustratedEnd ValueYear 1Income TaxSavings15.4191105.0\%$19,797,260$21,246,697$3,000,425Annual AnnuityAmountAnnuity Factor7520 ReportableValue of Annuity7520 ReportableRemainderProbability ofExhaustion$1,000,00011.8907$11,890,743$8,109,2570.00\%Actual Present ValueDiscount RateYr 1 Tax Savings + ActualPV of AnnuityActual Present Value ofActual Present Value ofRemainderActual Present Value ofRemainderActual Present Value ofRemainder$	#2			19	0	ne		70			N/A
$ \begin{array}{c c c c c c c c c c c c c c c c c c c $						-		7520 Rate			
Life ExpectancyYear of DeathActual Life ExpectancyGrowth RateAnnuity PaymentsIllustrated End ValueIncome Tax Savings15.419105.20%\$19,797,260\$21,246,697\$3,000,425Annual Annual Annual Annual Annuaty AmountAnnuity Factor7520 Reportable Value of Annuity7520 Reportable RemainderProbability of Exhaustion\$1,000,00011.8907\$11,890,743\$8,109,2570.00%Actual Present Value Discount RateYr 1 Tax Savings + Actual PV of AnnuityActual Present Value of AnnuityActual Present Value of AnnuityActual Present Value of RemainderActual Present Value of RemainderActual Present Value of Remainder				\$20,000,000	5.0	0%		5.20%			
Annual Annuity Amount Annuity Factor 7520 Reportable Value of Annuity 7520 Reportable Charitable Remainder Probability of Exhaustion   \$1,000,000 11.8907 \$11,890,743 \$8,109,257 0.00%   Actual Present Value Discount Rate Yr 1 Tax Savings + Actual PV of Annuity Actual Present Value of Annuity Actual Present Value of Annuity Actual Present Value of Annuity	Life				Growt	h Rate	[	Annuity			Income Tax
Annual Annuity Amount Annuity Factor 7520 Reportable Value of Annuity Charitable Remainder Probability of Exhaustion   \$1,000,000 11.8907 \$11,890,743 \$8,109,257 0.00%   Actual Present Value Discount Rate Yr 1 Tax Savings + Actual PV of Annuity Actual Present Value of Annuity Actual Present Value of Actual Present Value of	15.4		19	110	5.2	20%	<b>\$</b> :	19,797,260	\$21	,246,697	\$3,000,425
Actual Present Value Discount RateYr 1 Tax Savings + Actual PV of AnnuityActual Present Value of AnnuityActual Present Value of Remainder		ity	An	nuity Factor		-		Charita	ble	Р	-
Discount Rate PV of Annuity Annuity Remainder	\$1,000,000	)		11.8907	\$11,89	90,743		\$8,109,	257		0.00%
6.20%   \$14,419,970   \$11,419,545   \$7,708,620	Discount	Rate	ie	PV of Ann	uity		Α	nnuity	of	Re	mainder
	6.20%	/ 0		\$14,419,9	970	ç	511	.,419,545		\$7,	,708,620



### **CRAT Details Table**

Show	Every	- 1	+ Year(s)	🛑 Year Of [	Death 🛛 🔵 End Of	Term			
Year	Year #	Survivor Age	Beginning Value	Growth	Annuity Amount*	End Value	Yr 1 Pmt Rate	PV of Annuity Payments	PV of Remainder
2025	1	0	\$20,000,000.00	\$208,000.00	\$200,000.00	\$20,008,000.00	5.00%	\$190,114.07	\$19,019,011.41
2026	2	0	\$20,008,000.00	\$1,040,416.00	\$1,000,000.00	\$20,048,416.00	5.00%	\$1,093,698.05	\$18,115,427.43
2027	3	0	\$20,048,416.00	\$1,042,517.63	\$1,000,000.00	\$20,090,933.63	5.00%	\$1,952,618.18	\$17,256,507.30
2028	4	0	\$20,090,933.63	\$1,044,728.55	\$1,000,000.00	\$20,135,662.18	5.00%	\$2,769,082.18	\$16,440,043.30
2029	5	0	\$20,135,662.18	\$1,047,054.43	\$1,000,000.00	\$20,182,716.61	5.00%	\$3,545,188.64	\$15,663,936.83
2030	6	0	\$20,182,716.61	\$1,049,501.26	\$1,000,000.00	\$20,232,217.87	5.00%	\$4,282,932.43	\$14,926,193.04
2031	7	0	\$20,232,217.87	\$1,052,075.33	\$1,000,000.00	\$20,284,293.20	5.00%	\$4,984,209.79	\$14,224,915.68
2032	8	0	\$20,284,293.20	\$1,054,783.25	\$1,000,000.00	\$20,339,076.45	5.00%	\$5,650,823.25	\$13,558,302.22
2033	9	0	\$20,339,076.45	\$1,057,631.98	\$1,000,000.00	\$20,396,708.43	5.00%	\$6,284,486.24	\$12,924,639.23
2034	10	0	\$20,396,708.43	\$1,060,628.84	\$1,000,000.00	\$20,457,337.27	5.00%	\$6,886,827.48	\$12,322,297.99
2035	11	0	\$20,457,337.27	\$1,063,781.54	\$1,000,000.00	\$20,521,118.81	5.00%	\$7,459,395.20	\$11,749,730.27
2036	12	0	\$20,521,118.81	\$1,067,098.18	\$1,000,000.00	\$20,588,216.99	5.00%	\$8,003,661.10	\$11,205,464.37
2037	13	0	\$20,588,216.99	\$1,070,587.28	\$1,000,000.00	\$20,658,804.27	5.00%	\$8,521,024.12	\$10,688,101.35
2038	14	0	\$20,658,804.27	\$1,074,257.82	\$1,000,000.00	\$20,733,062.09	5.00%	\$9,012,814.06	\$10,196,311.41
2039	15	0	\$20,733,062.09	\$1,078,119.23	\$1,000,000.00	\$20,811,181.32	5.00%	\$9,480,294.99	\$9,728,830.47
2040	16	0	\$20,811,181.32	\$1,082,181.43	\$1,000,000.00	\$20,893,362.75	5.00%	\$9,924,668.50	\$9,284,456.96
2041	17	0	\$20,893,362.75	\$1,086,454.86	\$1,000,000.00	\$20,979,817.61	5.00%	\$10,347,076.78	\$8,862,048.68
2042	18	0	\$20,979,817.61	\$1,090,950.52	\$1,000,000.00	\$21,070,768.13	5.00%	\$10,748,605.56	\$8,460,519.90
2043	19	0	\$21,070,768.13	\$1,095,679.94	\$1,000,000.00	\$21,166,448.07	5.00%	\$11,130,286.91	\$8,078,838.55
2044	20	0	\$21,166,448.07	\$877,508.75	\$797,260.27	\$21,246,696.55	5.00%	\$11,419,544.87	\$7,708,619.67

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## **Conclusion**

#### Thank you!

Taking the time to learn about Charitable Remainder Annuity Trusts (CRATs) is an important step to understanding your estate plan.

This presentation was generated by EstateView, software crafted to measure, design, illustrate & educate planners and their clients.

#### Do you have any questions or comments about the plan covered in this presentation?

We encourage you to reach out to discuss your specific situation in more detail with your trusted advisors:

[Planner Name] – [Planner Title] [Planner's firm name] [Planner email address]

