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Executive Summary

- This is an illustration of a Charitable Remainder UniTrust (CRUT) for a term of years (maximum number of years is 20 or life), in this case a term of 18 years, which involves the lifetime creation of a CRUT with \$20,000,000. The CRUT pays to the grantor(s) or others 5.20% of the value of the CRUT each year, determined annually.
- The CRUT is expressly provided for in the Internal Revenue Code and permits a grantor to effectively make a gift of a remainder interest in property while retaining an annual payment right in the form of at least an annual (can be quarterly, monthly, biannual, or annual) payment based upon a fixed percentage of the fair market value of the assets placed in trust, determined annually. The grantor will usually receive an income tax charitable contribution deduction on inception.





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 두	No	Yes
"5% Probability of Exhaustion Test" Applies	Yes 🗣	Yes 🖣	No
10% Minimum Remainder Requirement	Yes 🖣	Yes 🖣	Yes 🖣



Assumptions Overview

Transfer Date:	10/19/2024	Payout Schedule:	Annual		
Highest Available § 7520 Rate:	5.20%	Number of Months before First Payment:	12		
Number of Lives:	One	Trust Value:	\$20,000,000		
Grantor Age (Nearest	70	Use FLIP NIMCRUT?:	False		
Birthday):		NIMCRUT # Of Deferral	N/A		
2nd Life Age (Nearest	N/A	Years:			
Birthday):		Percent of Payment	N/A		
Table Life Expectancy:	15.4	Deferred:			
Term of CRUT:	18 years	Use Explosive Asset?:	N/A		
Grantor Yr of Death:	85	Day 1 Value (Included in Trust Value above):	\$20,000,000		
2nd Life Yr of Death:	N/A	Years Until Sale:	N/A		
		Value On Sale:	N/A		
Mortality Table:	2010 CM				
Payout Rate:	5.20%	Time Value of Money, Illustration, Rate:	5.80%		
Annual Growth Rate:	0.00%	Remainder Factor	Interpolation		
Income Tax Rate:	37.00%	Calculation Method:			



<u>CRUT – Calculation Results</u>





Donor transfers **\$20,000,000** assets to CRUT and receives income tax charitable deduction of approximately **\$8,031,640**.

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 **5.20%** fixed percentage of the net fair market value of the property under the trust, valued and paid **Annual**, to the Donor or other non-charitable beneficiaries for Donor's lifetime or a term of **18 years**.

The total payments to the Donor or other noncharitable beneficiaries are projected to be \$12,346,805.

The CRUT is a tax-exempt entity and does not pay tax on the gain from the sale of an appreciated asset. But be aware that CRUTs 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 \$7,653,195 which is transferred directly to one or more charities.



Pre-plan to Create a Testamentary CRUT



CRUT 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 **\$8,031,640**.

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)

<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 **5.20%** fixed percentage of the net fair market value of the property under the trust, valued and paid **Annual**, to non-charitable beneficiaries for a term of **18 years**.

The total payments to non-charitable beneficiaries are projected to be **\$12,346,805**.

The CRUT is a tax-exempt entity and does not pay tax on the gain from the sale of an appreciated asset. But be aware that CRUTs 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.





one or more charities.



CRUT Summary Table

Life	T # 3 Dution Dunt 00,000 Year of Death	Term of CR 18 years Payout Ra 5.20% 1st Year Payment	S	Number Or Payout S Ann	ne Schedule	Month	70 70 s Before F ayment 12	irst	Survivor N/A 7520 Ra		
Contribu Amou \$20,000 IRS Table Life Expectancy 15.4 Table F Adjustmet	oution ount 00,000 Year of Death	Payout Ra 5.20% 1 st Year	ate	Payout S	Schedule		s Before F ayment	irst	7520 Ra		
Amou \$20,000 IRS Table Life Expectancy 15.4 Table F Adjustmet	ount 00,000 Year of Death	5.20% 1 st Year		•			ayment	irst		ite	
IRS Table Life Expectancy 15.4 Table F Adjustmen	Year of Death	1 st Year	Total	Ann	nual		12				
Life Expectancy 15.4 Table F Adjustme	Death		Total						5.20%		
Table F Adjustme			Payment	Illusti s End V		Year 1 Income Tax Savings	Grow Rate		Гуре of CRUT	YR of FLI	
Adjustme	15	\$208,000	\$12,346,8 5	30 \$7,653	3,195	\$2,971,707	0.00%		CRUT	N/A	
Tuctor	ent A	Adjusted Payout Rate (Table F)	Income	e Factor		ainder Ictor	Charitat		7520 Rep Value of Inter	Unitrust	
0.950570	70	4.943	0.59	8418	0.401582 \$3 Actual Present Value of Annuity Payments		\$8,031,640		\$11,968,360		
Actual Life	fe Expectar	ncv	al Present viscount Ra					of Actual Prese Remai			
			5.80%		\$7,785,258			5	\$2,621,894		



CRUT Details Table

Show E	very	- 1	+	Year(s) 🛑 Year Of De	eath 🛛 End Of Term	Flip NIMCRU	JT Year								Ô	Export to Excel
Year	Year #	Grantor Age	Survivor Age	Probability Survival To Year	Probability Of Death Each Year	Beginning Value	Growth	Payout Rate	Annual Payment Amount	Actual Payment Made	Make-Up Payment Owed	Make-Up Payment Made	Cumulative Make-Up Owed	End Value	PV of Annuity Payments	PV of Remainder
2025	1	71	0	98.04%	2.09%	\$20,000,000.00	\$0.00	5.20%	\$208,000.00	\$208,000.00	\$0.00	\$0.00	\$0.00	\$19,792,000.00	\$196,597.35	\$18,706,994.33
2026	2	72	0	95.95%	2.24%	\$19,792,000.00	\$0.00	5.20%	\$1,029,184.00	\$1,029,184.00	\$0.00	\$0.00	\$0.00	\$18,762,816.00	\$1,116,033.75	\$16,762,032.73
2027	3	73	0	93.70%	2.40%	\$18,762,816.00	\$0.00	5.20%	\$975,666.43	\$975,666.43	\$0.00	\$0.00	\$0.00	\$17,787,149.57	\$1,939,876.57	\$15,019,288.30
2028	4	74	0	91.30%	2.57%	\$17,787,149.57	\$0.00	5.20%	\$924,931.78	\$924,931.78	\$0.00	\$0.00	\$0.00	\$16,862,217.79	\$2,678,064.65	\$13,457,736.59
2029	5	75	0	88.73%	2.73%	\$16,862,217.79	\$0.00	5.20%	\$876,835.33	\$876,835.33	\$0.00	\$0.00	\$0.00	\$15,985,382.47	\$3,339,503.50	\$12,058,539.02
2030	6	76	0	86.00%	2.91%	\$15,985,382.47	\$0.00	5.20%	\$831,239.89	\$831,239.89	\$0.00	\$0.00	\$0.00	\$15,154,142.58	\$3,932,172.71	\$10,804,815.68
2031	7	77	0	83.09%	3.09%	\$15,154,142.58	\$0.00	5.20%	\$788,015.41	\$788,015.41	\$0.00	\$0.00	\$0.00	\$14,366,127.16	\$4,463,222.26	\$9,681,441.65
2032	8	78	0	80.00%	3.30%	\$14,366,127.16	\$0.00	5.20%	\$747,038.61	\$747,038.61	\$0.00	\$0.00	\$0.00	\$13,619,088.55	\$4,939,058.71	\$8,674,864.54
2033	9	79	0	76.70%	3.48%	\$13,619,088.55	\$0.00	5.20%	\$708,192.60	\$708,192.60	\$0.00	\$0.00	\$0.00	\$12,910,895.95	\$5,365,422.56	\$7,772,941.01
2034	10	80	0	73.22%	3.68%	\$12,910,895.95	\$0.00	5.20%	\$671,366.59	\$671,366.59	\$0.00	\$0.00	\$0.00	\$12,239,529.36	\$5,747,457.47	\$6,964,790.24
2035	11	81	0	69.54%	3.86%	\$12,239,529.36	\$0.00	5.20%	\$636,455.53	\$636,455.53	\$0.00	\$0.00	\$0.00	\$11,603,073.83	\$6,089,772.30	\$6,240,662.71
2036	12	82	0	65.68%	4.03%	\$11,603,073.83	\$0.00	5.20%	\$603,359.84	\$603,359.84	\$0.00	\$0.00	\$0.00	\$10,999,713.99	\$6,396,496.74	\$5,591,822.54
2037	13	83	0	61.65%	4.17%	\$10,999,713.99	\$0.00	5.20%	\$571,985.13	\$571,985.13	\$0.00	\$0.00	\$0.00	\$10,427,728.86	\$6,671,331.12	\$5,010,442.13
2038	14	84	0	57.48%	4.37%	\$10,427,728.86	\$0.00	5.20%	\$542,241.90	\$542,241.90	\$0.00	\$0.00	\$0.00	\$9,885,486.96	\$6,917,591.04	\$4,489,507.69
2039	15	85	0	53.11%	4.50%	\$9,885,486.96	\$0.00	5.20%	\$514,045.32	\$514,045.32	\$0.00	\$0.00	\$0.00	\$9,371,441.64	\$7,138,247.37	\$4,022,734.68
2040	16	86	0	48.61%	4.59%	\$9,371,441.64	\$0.00	5.20%	\$487,314.97	\$487,314.97	\$0.00	\$0.00	\$0.00	\$8,884,126.68	\$7,335,962.12	\$3,604,491.94
2041	17	87	0	44.02%	4.63%	\$8,884,126.68	\$0.00	5.20%	\$461,974.59	\$461,974.59	\$0.00	\$0.00	\$0.00	\$8,422,152.09	\$7,513,120.51	\$3,229,733.80
2042	18	88	0	39.38%	4.61%	\$8,422,152.09	\$0.00	5.20%	\$437,951.91	\$437,951.91	\$0.00	\$0.00	\$0.00	\$7,984,200.18	\$7,671,859.79	\$2,893,939.17
2043	19	89	0	34.77%	4.52%	\$7,984,200.18	\$0.00	5.20%	\$331,005.25	\$331,005.25	\$0.00	\$0.00	\$0.00	\$7,653,194.93	\$7,785,258.26	\$2,621,893.75



Conclusion

Thank you!

Taking the time to learn about Charitable Remainder Unitrusts (CRUTs) 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:



