Loan-Based Private Split Dollar (with Premium Reserve Account)

For: Tom and Donna Anthony


Presented By:
[Licensed user's name appears here]

# This arrangement involves a promissory note between a Lender -- usually a parent or grandparent -- and an irrevocable trust formed on behalf of children or grandchildren. 

Promissory Note: The one-time loan associated with the arrangement is evidenced by a promissory note between the Lender and the trust, and the life insurance policy is assigned as collateral security for the loan. The loan is a term loan, i.e., it is due at the end of a specific period of years; however, the promissory note calls for the acceleration of repayment should the insured die prior to the date of scheduled loan repayment.

Loan Interest: The interest rate for the loan must bear interest equal to or greater than the Applicable Federal Rate ("AFR") established under IRC Sections 7872(f)(2)(A) and 1274(d) at the inception of the loan.

If no interest or an inadequate rate of interest is charged on a loan, the IRS recharacterizes the loan into an "arms-length" transaction and imputes an interest rate that is deemed to have been received by the Lender and paid by the trust. The rate is published monthly and is determined by the length of the loan transaction, i.e., either the short-term rate (3 years or less), the mid-term rate (over 3 years but not over 9 years), or the long-term rate (over 9 years).

So long as the loan interest rate is equal to or exceeds the Applicable Federal Rate, no interest is imputed by the IRS on the transaction.

The accompanying calculations assume the trust is a so-called "intentionally defective" grantor trust, and additional gifts to the trust are usually scheduled to offset any loan interest due by the trust. The Lender is assumed to be the grantor of the trust and, due to grantor trust rules, there is no income tax due by the Lender on such loan interest received, i.e., the Lender and the trust are a single income tax entity. (IRC Section 671 and 675, IRS Reg. 1.671-2(c) and Rev. Rul. 85-13.) Thus, if gifts for loan interest are made, they are returned as non-taxable loan interest.

Applicable Federal Rates for April 2017<br>Long-term loans (over 9 years): 2.82\%<br>Mid-term loans (over 3 years; not over 9): 2.12\%<br>Short-term loans (3 years or less): 1.11\%


#### Abstract

Annual Gift Exclusions and Lifetime Gift Exemptions: The loaned funds should not apply against the Lender's (and his/her spouse's) lifetime gift exemption or annual gift exclusions; therefore, significantly greater amounts than usual can typically be allocated to the trust without incurring gift or estate taxes.


Taxation At Death: The life insurance payable to the trust should be free of all estate transfer taxes as the presence of the loan to the trust should not contaminate the estate tax free nature of the life insurance death benefit (PLR 9809032). The promissory note is repayable by the trust at the end of the term of years specified in the promissory note or at the death of the Lender, whichever occurs first, and repayment proceeds triggered by the death of the Lender will be subject to estate settlement costs in the estate of the Lender. If there is any accrued loan interest included in the repayment proceeds, there should be no income tax consequences to the Lender's estate on the loan interest component since, as indicated above, the Lender and the trust are a single income tax entity.

Premium Reserve Account: Although the loan to the trust involves a one-time transfer of funds from the Lender to the trust, the life insurance policy in the accompanying material bears multiple scheduled premiums due to the more favorable taxation of policies not funded with a single premium. The loaned funds in excess of the dollars needed to pay the policy's initial premium are reserved by the trustee in a Premium Reserve Account ("PRA") and used to pay the stream of multiple premiums required for the most favorable taxation of policy values. Taxable interest on the PRA from an outside source

Preface (continued)
is taxable to the Lender (grantor trust rules do not apply to such interest). Due to this, a tax exempt account is often the preferred vehicle for the PRA.

Policy Loans: The trustee can borrow cash values for loan repayment or loan interest payments only for amounts that are in excess of those cash values that collateralize the promissory notes.

## Important Notes

A rise in the AFR at the renewal of a demand, short-term or mid-term loan may result in an

## Borrower and Policy Owner: Anthony Family Trust

 Insured: Tom Anthony/Donna Anthonyunattractive loan interest rate. With a financial arrangement of many years, a long-term loan produces more stable interest rates that can be renegotiated down should the AFR decline, but are capped at rates that are known as each loan is made. Due to this you may want to establish your plan using a long-term loan.

You should consult with your legal and tax advisers before entering into this or any other arrangement involving tax, legal, and economic considerations.


Note: Cash Value and Death Benefit includes Trust's Premium Reserve Account in years 1-5.
This graphic assumes the non-guaranteed values shown continue in all years. This is not likely, and actual results may be more or less favorable.

## Loan-Based Private Split Dollar Using Indexed Survivor UL

Borrower and Policy Owner: Anthony Family Trust Insureds: Tom Anthony/Donna Anthony

*This is an InsMark supplemental illustration for indexed survivor universal life. In an actual presentation, this footnote refers to an accompanying basic illustration from a specific life insurance company with important details, caveats, and guarantees.

## Loan-Based Private Split Dollar Using Indexed Survivor UL

|  |  | Indexed Survivor UL Interest Rate 7.00\% |  | Initial <br> Premium <br> 360,000 | Initial Policy Death Benefit 10,000,000 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Year | $\begin{aligned} & \text { M/F } \\ & \text { Ages } \end{aligned}$ | (1) <br> Policy Premium | (2) <br> Pre-Tax Policy Cash Flow | (3) <br> Year End Accum Value* | (4) <br> Year End Cash Value* | (5) <br> Death <br> Benefit |
| 31 | 85/80 | 0 | 0 | 10,019,513 | 10,019,513 | 20,019,513 |
| 32 | 86/81 | 0 | 0 | 10,580,488 | 10,580,488 | 20,580,488 |
| 33 | 87/82 | 0 | 0 | 11,137,306 | 11,137,306 | 21,137,306 |
| 34 | 88/83 | 0 | 0 | 11,679,591 | 11,679,591 | 21,679,591 |
| 35 | 89/84 | 0 | 0 | 12,197,709 | 12,197,709 | 22,197,709 |
| 36 | 90/85 | 0 | 0 | 12,678,542 | 12,678,542 | 22,678,542 |
| 37 | 91/86 | 0 | 0 | 13,110,457 | 13,110,457 | 23,110,457 |
| 38 | 92/87 | 0 | 0 | 13,478,812 | 13,478,812 | 23,478,812 |
| 39 | $93 / 88$ | 0 | 0 | 13,767,522 | 13,767,522 | 23,767,522 |
| 40 | 94/89 | 0 | 0 | 13,959,869 | 13,959,869 | 23,959,869 |

*This is an InsMark supplemental illustration for indexed survivor universal life. In an actual presentation, this footnote refers to an accompanying basic illustration from a specific life insurance company with important details, caveats, and guarantees.

## Loan-Based Private Split Dollar Funded With Indexed Survivor UL

## Flow Chart

## Lender's Activity



## Trust Receives

Step 5b


## Loan-Based Private Split Dollar Funded With Indexed Survivor UL

## Summary

Borrower and Policy Owner: Anthony Family Trust Insureds: Tom Anthony/Donna Anthony

| Indexed Survivor UL | Initial Policy | Assumed Long-Term AFR | Promissory Note |
| :---: | :---: | :---: | :---: |
| Interest Rate | Death Benefit | for All Years Illustrated | Interest Rate |
| $7.00 \%$ | $10,000,000$ | $2.82 \%$ | $2.82 \%$ |


| Year |  | Gift and Loan Summary |  |  |  | Trust's Values |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | M/F <br> Ages | (1) <br> Gift to Trust for Premium | (2) <br> Loan to Trust for Premium | (3) <br> Year End Balance of Loan | (4) <br> Year End Premium Reserve Account* | (5) <br> Year End Policy Accum Value** | (6) <br> Year End Policy Cash Value** | (7) <br> Year End Policy Cash Value** $\dagger$ Net of Loan | (8) <br> Year End Policy Death Benefit† Net of Loan |
| 1 | 55/50 | 0 | 1,698,155 | 1,698,155 | 1,378,300 | 326,263 | 0 | -319,855 | 10,006,408 |
| 2 | 56/51 | 0 | 0 | 1,698,155 | 1,048,849 | 675,258 | 283,658 | -365,648 | 10,025,952 |
| 3 | $57 / 52$ | 0 | 0 | 1,698,155 | 709,514 | 1,048,661 | 692,661 | -295,980 | 10,060,020 |
| 4 | 58/53 | 0 | 0 | 1,698,155 | 360.000 | 1,448,160 | 1,127,760 | -210,395 | 10,110,005 |
| 5 | 59/54 | 0 | 0 | 1,698,155 | 0 | 1,875,577 | 1,590,777 | -107,378 | 10,177,422 |
| 6 | 60/55 | 0 | 0 | 1,698,155 | 0 | 1,970,755 | 1,721,555 | 23,400 | 10,272,600 |
| 7 | 61/56 | 0 | 0 | 1,698,155 | 0 | 2,072,513 | 1,858,913 | 160,758 | 10,374,358 |
| 8 | 62/57 | 0 | 0 | 1,698,155 | 0 | 2,181,290 | 2,003,290 | 305,135 | 10,483,135 |
| 9 | 63/58 | 0 | 0 | 1,698,155 | 0 | 2,297,566 | 2,155,166 | 457,011 | 10,599,411 |
| 10 | 64/59 | 0 | 0 | 1,698,155 | 0 | 2,421,826 | 2,315,026 | 616,871 | 10,723,671 |
| 11 | 65/60 | 0 | 0 | 1,698,155 | 0 | 2,569,600 | 2,498,400 | 800,245 | 10,871,445 |
| 12 | 66/61 | 0 | 0 | 1,698,155 | 0 | 2,728,358 | 2,692,758 | 994,603 | 11,030,203 |
| 13 | 67/62 | 0 | 0 | 1,698,155 | 0 | 2,934,576 | 2,934,576 | 1,236,421 | 11,236,421 |
| 14 | 68/63 | 0 | 0 | 1,698,155 | 0 | 3,156,075 | 3,156,075 | 1,457,920 | 11,457,920 |
| 15 | 69/64 | 0 | 0 | 1,698,155 | 0 | 3,393,932 | -3,393,932 | 1,695,777 | 11,695,777 |
| 16 | 70/65 | 0 | 0 | 1,698,155 | 0 | 3,649,240 | 3,649,240 | 1,951,085 | 11,951,085 |
| 17 | 71/66 | 0 | 0 | 1,698,155 | 0 | 3,923,049 | 3,923,049 | 2,224,894 | 12,224,894 |
| 18 | 72/67 | 0 | 0 | 1,698,155 | 0 | 4,216,466 | 4,216,466 | 2,518,311 | 12,518,311 |
| 19 | 73/68 | 0 | 0 | 1,698,155 | 0 | 4,530,553 | 4,530,553 | 2,832,398 | 12,832,398 |
| 20 | 74/69 | 0 | 0 | 1,698,155 | 0 | 4,866,330 | 4,866,330 | 3,168,175 | 13,168,175 |
| 21 | 75/70 | 0 | 0 | 1,698,155 | 0 | 5,224,617 | 5,224,617 | 3,526,462 | 13,526,462 |
| 22 | 76/71 | 0 | 0 | 1,698,155 | 0 | 5,605,991 | 5,605,991 | 3,907,836 | 13,907,836 |
| 23 | 77/72 | 0 | 0 | 1,698,155 | 0 | 6,010,887 | 6,010,887 | 4,312,732 | 14,312,732 |
| 24 | 78/73 | 0 | 0 | 1,698,155 | 0 | 6,439,306 | 6,439,306 | 4,741,151 | 14,741,151 |
| 25 | 79/74 | 0 | 0 | 1,698,155 | 0 | 6,890,753 | 6,890,753 | 5,192,598 | 15,192,598 |
| 26 | 80/75 | 0 | 0 | 1,698,155 | 0 | 7,364,882 | 7,364,882 | 5,666,727 | 15,666,727 |
| 27 | 81/76 | 0 | 0 | 1,698,155 | 0 | 7,861,015 | 7,861,015 | 6,162,860 | 16,162,860 |
| 28 | 82/77 | 0 | 0 | 1,698,155 | 0 | 8,377,807 | 8,377,807 | 6,679,652 | 16,679,652 |
| 29 | 83/78 | 0 | 0 | 1,698,155 | 0 | 8,912,629 | 8,912,629 | 7,214,474 | 17,214,474 |
| 30 | 84/79 | 0 | 0 | 1,698,155 | 0 | 9,461,845 | 9,461,845 | 7,763,690 | 17,763,690 |
|  |  | 0 | 1,698,155 |  |  |  |  |  |  |


$\dagger \dagger$ Cash value less loans due Lender.
**This is an InsMark supplemental illustration for indexed survivor universal life. In an actual presentation, this footnote refers to an accompanying basic illustration from a specific life insurance company with important details, caveats, and guarantees.

## Loan-Based Private Split Dollar Funded With Indexed Survivor UL

## Summary

Borrower and Policy Owner: Anthony Family Trust Insureds: Tom Anthony/Donna Anthony

| Indexed Survivor UL | Initial Policy | Assumed Long-Term AFR | Promissory Note |
| :---: | :---: | :---: | :---: |
| Interest Rate | Death Benefit | for All Years Illustrated | Interest Rate |
| $7.00 \%$ | $10,000,000$ | $2.82 \%$ | $2.82 \%$ |



40 Year Analysis

|  | Living Values $^{\dagger \dagger}$ |  |  |
| :---: | ---: | ---: | ---: |
|  |  | Death Benefit |  |
| Indexed Survivor UL: | $13,959,869$ |  | $23,959,869$ |
| Loan Repayment Due: | $1,698,155$ |  | $1,698,155$ |
| Value to Policy Owner: | $12,261,714$ |  | $22,261,714$ |

$\dagger \dagger$ Cash value less loans due Lender.

## Loan-Based Private Split Dollar Funded With Indexed Survivor UL

Premium Reserve Account (PRA) Analysis Using a Tax Exempt Account

Borrower and Policy Owner: Anthony Family Trust Insureds: Tom Anthony/Donna Anthony

PRA's Assumed Tax Exempt Yield 3.00\%


Borrower and Policy Owner: Anthony Family Trust Insureds: Tom Anthony/Donna Anthony

|  |  | Assumed Longfor All Years Il 2.82\% | rm AFR strated | Promissory Note Interest Rate 2.82\% |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Year | $\begin{aligned} & \text { M/F } \\ & \text { Ages } \end{aligned}$ | (1) <br> Loan from Lender to Trust for Premium* | (2) <br> Loan Interest Due Lender from Trust | (3) <br> Gift to <br> Trust to Apply on Loan Interest Due Lender | (4) <br> Year End Balance of Loan |
| 1 | 55/50 | 1,698,155 | 47,888 | 47,888 | 1,698,155 |
| 2 | 56/51 | 0 | 47,888 | 47,888 | 1,698,155 |
| 3 | 57/52 | 0 | 47,888 | 47,888 | 1,698,155 |
| 4 | 58/53 | 0 | 47,888 | 47,888 | 1,698,155 |
| 5 | 59/54 | 0 | 47,888 | 47,888 | 1,698,155 |
| 6 | 60/55 | 0 | 47,888 | 47,888 | 1,698,155 |
| 7 | 61/56 | 0 | 47,888 | 47,888 | 1,698,155 |
| 8 | 62/57 | 0 | 47,888 | 47,888 | 1,698,155 |
|  | 63/58 | 0 | 47,888 | 47,888 | 1,698,155 |
| 10 | 64/59 | 0 | 47,888 | 47,888 | 1,698,155 |
| 11 | 65/60 | 0 | 47,888 | 47,888 | 1,698,155 |
| 12 | 66/61 | 0 | 47,888 | 47,888 | 1,698,155 |
| 13 | 67/62 | 0 | 47,888 | 47,888 | 1,698,155 |
| 14 | 68/63 | 0 | 47,888 | 47,888 | 1,698,155 |
| 15 | 69/64 | 0 | 47,888 | 47,888 | 1,698,155 |
| 16 | 70/65 | 0 | 47,888 | 47,888 | 1,698,155 |
| 17 | 71/66 | 0 | 47,888 | 47,888 | 1,698,155 |
| 18 | 72/67 | 0 | 47,888 | 47,888 | 1,698,155 |
| 19 | 73/68 | 0 | 47,888 | 47,888 | 1,698,155 |
| 20 | 74/69 | 0 | 47,888 | 47,888 | 1,698,155 |
| 21 | 75/70 | 0 | 47,888 | 47,888 | 1,698,155 |
| 22 | 76/71 | 0 | 47,888 | 47,888 | 1,698,155 |
| 23 | 77/72 | 0 | 47,888 | 47,888 | 1,698,155 |
| 24 | 78/73 | 0 | 47,888 | 47,888 | 1,698,155 |
| 25 | 79/74 | 0 | 47,888 | 47,888 | 1,698,155 |
| 26 | 80/75 | 0 | 47,888 | 47,888 | 1,698,155 |
| 27 | 81/76 | 0 | 47,888 | 47,888 | 1,698,155 |
| 28 | 82/77 | 0 | 47,888 | 47,888 | 1,698,155 |
| 29 | 83/78 | 0 | 47,888 | 47,888 | 1,698,155 |
| 30 | 84/79 | 0 | 47,888 | 47,888 | 1,698,155 |
|  |  | 1,698,155 | 1,436,640 | 1,436,640 |  |

*The promissory note between the parties is presumed to be secured by a collateral assignment of the policy and the premium reserve account.

The promissory note associated with this plan is due in 40 years or at the prior death of the insureds.

## Loan-Based Private Split Dollar Funded With Indexed Survivor UL

Presented By: [Licensed user's name appears here]
Lender and Trust Grantor: Tom Anthony

Borrower and Policy Owner: Anthony Family Trust
Insureds: Tom Anthony/Donna Anthony

|  |  | Assumed Long-Term AFR for All Years Illustrated 2.82\% |  | Promissory Note Interest Rate 2.82\% |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Year | $\begin{aligned} & \text { M/F } \\ & \text { Ages } \end{aligned}$ | (1) <br> Loan from Lender to Trust for Premium* | (2) <br> Loan Interest Due Lender from Trust | (3) Gift to Trust to Apply on Loan Interest Due Lender | Year End Balance of Loan |
| 31 | 85/80 | 0 | 47,888 | 47,888 | 1,698,155 |
| 32 | 86/81 | 0 | 47,888 | 47,888 | 1,698,155 |
| 33 | 87/82 | 0 | 47,888 | 47,888 | 1,698,155 |
| 34 | 88/83 | 0 | 47,888 | 47,888 | 1,698,155 |
| 35 | 89/84 | 0 | 47,888 | 47,888 | 1,698,155 |
| 36 | 90/85 | 0 | 47,888 | 47,888 | 1,698,155 |
| 37 | 91/86 | 0 | 47,888 | 47,888 | 1,698,155 |
| 38 | 92/87 | 0 | 47,888 | 47,888 | 1,698,155 |
| 39 | 93/88 | 0 | 47,888 | 47,888 | 1,698,155 |
| 40 | 94/89 | 0 | 47,888 | 47,888 | 1,698,155 |

[^0]See the accompanying supplemental report entitled "Loan-Based Private Split Dollar (Preface)" for remarks regarding loan interest rates used in this illustration.

The promissory note between the parties is presumed to be secured by a collateral assignment of the policy and the premium reserve account.

The promissory note associated with this plan is due in 40 years or at the prior death of the insureds.

## Loan-Based Private Split Dollar Funded With Indexed Survivor UL

Trust's 40 Year Analysis

Borrower and Policy Owner: Anthony Family Trust
Insureds: Tom Anthony/Donna Anthony


At Year 40
Trust's Cash Value Less Cum. Loan Due Lender
\$12,261,714
Trust's Estate Tax Free Death Benefit Less Cum. Loan Due Lender
\$22,261,714

## Loan-Based Private Split Dollar Funded With Indexed Survivor UL

| Annual Gift | Beginning Lifetime |
| :---: | :---: |
| Exclusions | Gift Exemption |
| 6 | $10,980,000$ |


| Year | $\begin{aligned} & \text { M/F } \\ & \text { Ages } \end{aligned}$ | (1) <br> Lifetime Gift Exemption* | (2) <br> Annual Gift Exclusion Indexed @ 3.00\% | (3) <br> Maximum Tax Free Gifts Available $(1)+(2)$ | (4) <br> Gift to Trust for Premium | (5) <br> Gift to <br> Trust for Loan Interest | (6) <br> Total Gift to Trust $(4)+(5)$ | (7) <br> Remaining Tax Free Gifts Available (3) - (6) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 55/50 | 10,980,000 | 84,000 | 11,064,000 | 0 | 47,888 | 47,888 | 11,016,112 |
| 2 | 56/51 | 11,320,000 | 90,000 | 11,410,000 | 0 | 47,888 | 47,888 | 11,362,112 |
| 3 | 57/52 | 11,660,000 | 90,000 | 11,750,000 | 0 | 47,888 | 47,888 | 11,702,112 |
| 4 | 58/53 | 12,000,000 | 96,000 | 12,096,000 | 0 | 47,888 | 47,888 | 12,048,112 |
| 5 | 59/54 | 12,360,000 | 96,000 | 12,456,000 | 0 | 47,888 | 47,888 | 12,408,112 |
| 6 | 60/55 | 12,740,000 | 102,000 | 12,842,000 | 0 | 47,888 | 47,888 | 12,794,112 |
| 7 | 61/56 | 13,120,000 | 102,000 | 13,222,000 | 0 | 47,888 | 47,888 | 13,174,112 |
| 8 | 62/57 | 13,520,000 | 108,000 | 13,628,000 | 0 | 47,888 | 47,888 | 13,580,112 |
| 9 | 63/58 | 13,920,000 | 108,000 | 14,028,000 | 0 | 47,888 | 47,888 | 13,980,112 |
| 10 | 64/59 | 14,340,000 | 114,000 | 14,454,000 | 0 | 47,888 | 47,888 | 14,406,112 |
| 11 | 65/60 | 14,760,000 | 120,000 | 14,880,000 | 0 | 47,888 | 47,888 | 14,832,112 |
| 12 | 66/61 | 15,220,000 | 120,000 | 15,340,000 | 0 | 47,888 | 47,888 | 15,292,112 |
| 13 | 67/62 | 15,660,000 | 126,000 | 15,786,000 | 0 | 47,888 | 47,888 | 15,738,112 |
| 14 | 68/63 | 16,140,000 | 132,000 | 16,272,000 | 0 | 47,888 | 47,888 | 16,224,112 |
| 15 | 69/64 | 16,620,000 | 132,000 | 16,752,000 | 0 | 47,888 | 47,888 | 16,704,112 |
| 16 | 70/65 | 17,120,000 | 138,000 | 17,258,000 | 0 | 47,888 | 47,888 | 17,210,112 |
| 17 | 71/66 | 17,640,000 | 144,000 | 17,784,000 | 0 | 47,888 | 47,888 | 17,736,112 |
| 18 | 72/67 | 18,160,000 | 144,000 | 18,304,000 | 0 | 47,888 | 47,888 | 18,256,112 |
| 19 | 73/68 | 18,700,000 | 150,000 | 18,850,000 | 0 | 47,888 | 47,888 | 18,802,112 |
| 20 | 74/69 | 19,260,000 | 156,000 | 19,416,000 | 0 | 47,888 | 47,888 | 19,368,112 |
| 21 | 75/70 | 19,840,000 | 162,000 | 20,002,000 | 0 | 47,888 | 47,888 | 19,954,112 |
| 22 | 76/71 | 20,440,000 | 162,000 | 20,602,000 | 0 | 47,888 | 47,888 | 20,554,112 |
| 23 | $77 / 72$ | 21,060,000 | 168,000 | 21,228,000 | 0 | 47,888 | 47,888 | 21,180,112 |
| 24 | 78/73 | 21,680,000 | 174,000 | 21,854,000 | 0 | 47,888 | 47,888 | 21,806,112 |
| 25 | 79/74 | 22,340,000 | 180,000 | 22,520,000 | 0 | 47,888 | 47,888 | 22,472,112 |
| 26 | 80/75 | 23,000,000 | 186,000 | 23,186,000 | 0 | 47,888 | 47,888 | 23,138,112 |
| 27 | 81/76 | 23,700,000 | 192,000 | 23,892,000 | 0 | 47,888 | 47,888 | 23,844,112 |
| 28 | 82/77 | 24,420,000 | 198,000 | 24,618,000 | 0 | 47,888 | 47,888 | 24,570,112 |
| 29 | 83/78 | 25,140,000 | 204,000 | 25,344,000 | 0 | 47,888 | 47,888 | 25,296,112 |
| 30 | 84/79 | 25,900,000 | 210,000 | 26,110,000 | 0 | 47,888 | 47,888 | 26,062,112 |
|  |  |  | 4,188,000 |  | 0 | 1,436,640 | 1,436,640 |  |

*Client's Unified Credit Equivalent is indexed for inflation at $3.00 \%$.
Values in Column (3) are based on client input assumptions.

## Loan-Based Private Split Dollar Funded With Indexed Survivor UL

| Annual Gift | Beginning Lifetime |
| :---: | :---: |
| Exclusions | Gift Exemption |
| 6 | $10,980,000$ |


| Year | $\begin{aligned} & \text { M/F } \\ & \text { Ages } \end{aligned}$ | (1) <br> Lifetime Gift Exemption* | (2) <br> Annual Gift Exclusion Indexed @ 3.00\% | (3) <br> Maximum Tax Free Gifts Available $(1)+(2)$ | (4) <br> Gift to Trust for Premium | (5) <br> Gift to Trust for Loan Interest | (6) <br> Total Gift to Trust $(4)+(5)$ | (7) <br> Remaining Tax Free Gifts Available (3) - (6) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 85/80 | 26,680,000 | 216,000 | 26,896,000 | 0 | 47,888 | 47,888 | 26,848,112 |
| 32 | 86/81 | 27,480,000 | 222,000 | 27,702,000 | 0 | 47,888 | 47,888 | 27,654,112 |
| 33 | 87/82 | 28,300,000 | 228,000 | 28,528,000 | 0 | 47,888 | 47,888 | 28,480,112 |
| 34 | 88/83 | 29,140,000 | 234,000 | 29,374,000 | 0 | 47,888 | 47,888 | 29,326,112 |
| 35 | 89/84 | 30,020,000 | 240,000 | 30,260,000 | 0 | 47,888 | 47,888 | 30,212,112 |
| 36 | 90/85 | 30,920,000 | 252,000 | 31,172,000 | 0 | 47,888 | 47,888 | 31,124,112 |
| 37 | 91/86 | 31,840,000 | 258,000 | 32,098,000 | 0 | 47,888 | 47,888 | 32,050,112 |
| 38 | 92/87 | 32,800,000 | 264,000 | 33,064,000 | 0 | 47,888 | 47,888 | 33,016,112 |
| 39 | 93/88 | 33,780,000 | 276,000 | 34,056,000 | 0 | 47,888 | 47,888 | 34,008,112 |
| 40 | 94/89 | 34,800,000 | 282,000 | 35,082,000 | 0 | 47,888 | 47,888 | 35,034,112 |

6,660,000
$0 \quad 1,915,520$
$1,915,520$
*Client's Unified Credit Equivalent is indexed for inflation at 3.00\%.
Values in Column (3) are based on client input assumptions.


[^0]:    $\mathbf{1 , 6 9 8}, 155 \quad 1,915,520 \quad 1,915,520$

