

Qualified Personal Residence Trust

Case Name	<input type="text" value="Default Case"/>		
Client's First Name	<input type="text" value="John"/>	Growth Rate of Principal	<input type="text" value="10.0%"/>
Client's Last Name	<input type="text" value="Doe"/>	Average Estate Tax Rate	<input type="text" value="50.0%"/>
Date of Transfer	<input type="text" value="12/27/2002"/>	Elect Gift Splitting?	<input type="text" value="No"/>
Section 7520 Rate	<input type="text" value="8.0%"/>	Client: Post-76 Taxable Gifts	<input type="text" value="0"/>
Beginning Principal	<input type="text" value="1,000,000"/>	Client: Used Unified Credit	<input type="text" value="0"/>
Basis	<input type="text" value="0"/>	Spouse: Post-76 Taxable Gifts	<input type="text" value="0"/>
Trust Term	<input type="text" value="10"/>	Spouse: Used Unified Credit	<input type="text" value="0"/>
Reversion Option	<input type="text" value="Retained"/>	First Term Comparison	<input type="text" value="10"/>
Number of Lives	<input type="text" value="One Life"/>	Increment	<input type="text" value="1"/>
Client's Nearest Age	<input type="text" value="65"/>	Gift Tax Law To Apply	<input type="text" value="Sunset"/>
Spouse's Nearest Age	<input type="text" value="0"/>		

Qualified Personal Residence Trust

General Analysis

John Doe - Default Case

General

Type of Trust	Shorter Of
Date of Transfer	12/27/2002
Section 7520 Rate	8.0%
Beginning Principal	1,000,000
Basis	0
Trust Term	10
Client's Nearest Age	65
Life Status	Single

Interest Breakdown

Income Interest	486,490
Pre-Term Remainder Interest (Reversion)	161,400
Post-Term Remainder Interest	352,110

Taxable Gift

Reversion Option	Retained
Total Interest	1,000,000
Retained Interest	647,890
Taxable Gift	352,110

Gift Tax Payable

Elect Gift Splitting?	No
Client's Post-76 Taxable Gifts	0
Client's Used Unified Credit	0
Gift Tax Payable	0

Ending Values

Years of Client's Life Expectancy	17.2
Years of Trust Duration (Term)	10
Average Estate Tax Rate	50.0%
Growth Rate of Principal	10.0%
Ending Principal	2,593,742
Built-in Gain	2,593,742
Estimated Estate Tax Savings	1,120,816

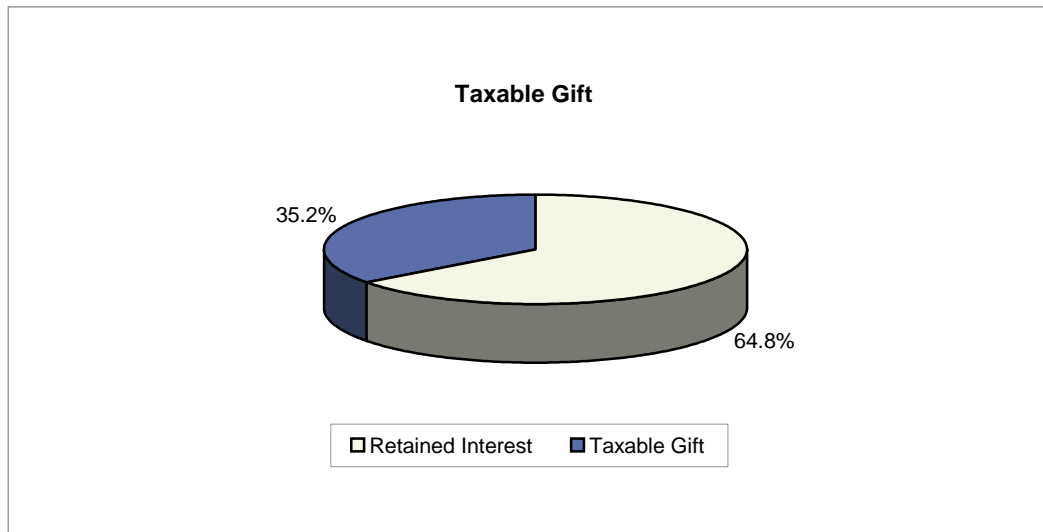
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Taxable Gift

John Doe - Default Case

Taxable Gift

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Total Interest	1,000,000
Retained Interest	647,890
Taxable Gift	352,110



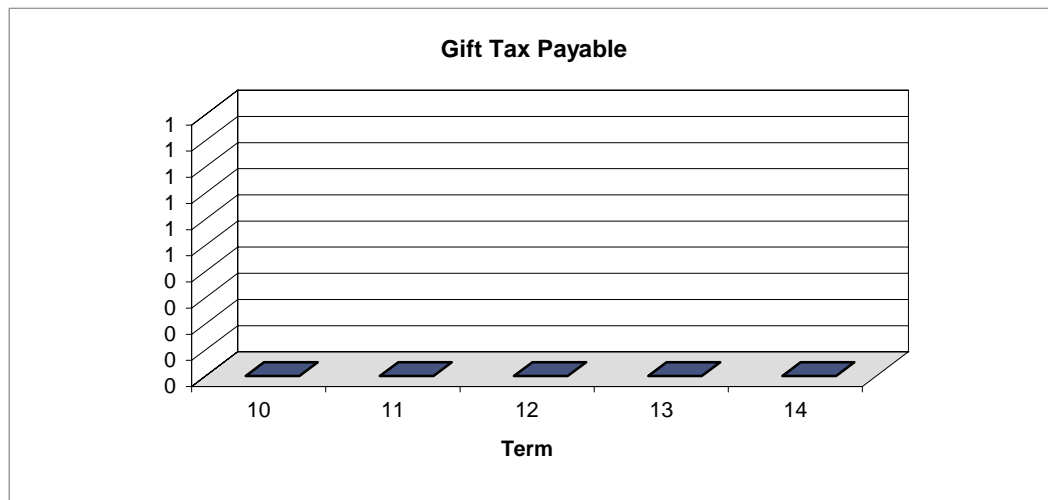
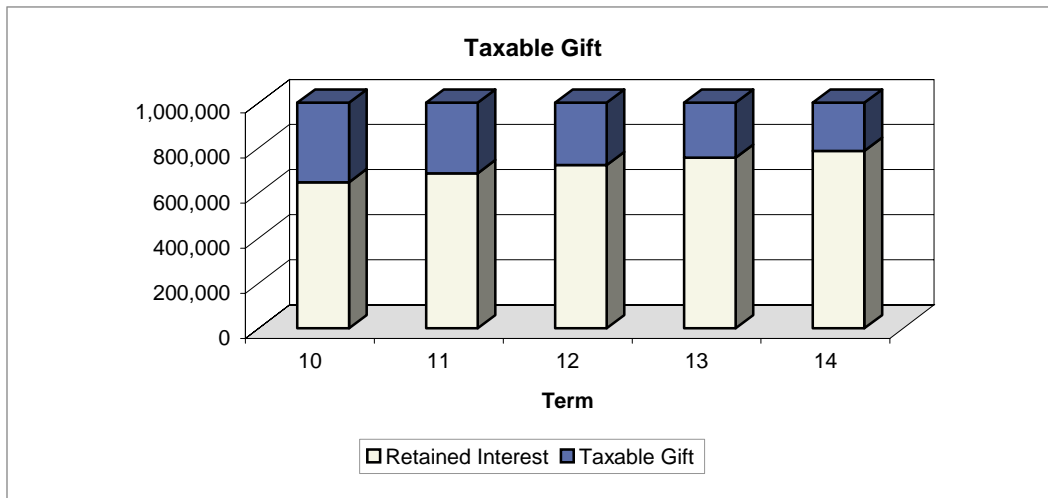
General

Type of Trust	Shorter Of
Date of Transfer	12/27/2002
Section 7520 Rate	8.0%
Beginning Principal	1,000,000
Basis	0
Trust Term	10
Client's Nearest Age	65

Term Comparisons

John Doe - Default Case

Term	Retained Interest	Taxable Gift	Gift Tax Payable
10	647,890	352,110	0
11	687,420	312,580	0
12	723,470	276,530	0
13	756,300	243,700	0
14	786,170	213,830	0



General

Beginning Principal	1,000,000
Elect Gift Splitting?	No
Client's Post-76 Taxable Gifts	0
Client's Used Unified Credit	0