



LLC NIMCRUT

**An Illustration of the Use of a Net Income with Makeup
Charitable Remainder Unitrust Funded with a
Limited Liability Company Interest**

AN ANALYSIS PREPARED EXCLUSIVELY FOR

Jack & Jill Flash

Transfer of \$10M LLC Interest to 20-Year Spigot NIMCRUT

Disclaimer

This financial plan is designed to provide educational and/or general information and is not intended to provide specific legal, accounting and/or tax advice. Any comparisons and projections including expected rates of return are presented for purposes of illustration only. Nevertheless, we believe that the comparisons as well as the other projections shown provide an important and valid basis for consideration when planning for your financial future.

IMPORTANT: *The projections or other information generated by this financial plan regarding the likelihood of various investment outcomes are hypothetical in nature, do not reflect actual investment results and are not guarantees of future results. Results herein may vary with each use of the software tool(s) used to generate this financial plan and over time.*

The financial plan may contain ideas for your consideration concerning aspects of your life such as tax, retirement and estate planning, but these are not presented as, and must not be taken for, legal or tax advice. It is your responsibility to determine if, and how, the suggestions contained in the financial plan should be implemented or otherwise followed. You must carefully consider all relevant factors in making these types of decisions. For specific advice on these aspects of your overall financial plan, you should consult your professional tax and legal advisors. The report that follows is based upon:

- information and assumptions that you have provided or reviewed;
- current tax laws;
- appropriate financial planning concepts;
- historic asset class characteristics;
- additional assumptions and information discussed with your advisor.

The outcome of the analysis will be dependent to a significant extent upon the information and the reasonableness of the planning assumptions. It is your responsibility to provide accurate and complete information. Please contact your advisor with any changes to your information and/or planning assumptions. Inaccurate information and/or unreasonable planning assumptions can materially impact the results of this financial plan.

The simulation of returns at the individual asset, account and/or portfolio level drives the investment projections and proposed financial plan. In all cases investment projections are not to be considered definitive estimates of how the individual assets you own now or in the future will perform. Therefore, it is important that you recognize that the comparisons shown may include comparisons of two asset allocation models—the asset allocation of your current portfolio and the asset allocation projected in our proposed plan—and not comparisons of the individual securities you own. Model comparisons and the projected rates of return are based on past performance of the relevant asset classes. Past performance is not a guarantee of future results. No future rate of return can be predicted with certainty.

The report that follows does not make specific investment recommendations or analyze particular securities. Rather, the report typically contains a proposed asset allocation model based upon your stated risk tolerance, age, current asset allocation and value of your assets. The asset allocation models we use are continuously re-evaluated and are periodically changed as a result. We are under no obligation to revise any financial planning report already prepared if an allocation model is changed after it is issued to you.

Actual results are influenced by events that are both within and outside of your control. The rates actually returned by asset classes will differ from our projections. The rates actually returned by any allocation model noted within the financial plan will likely differ from those returned by any individual portfolio of securities constructed to follow a specific allocation model. Any rate of return shown or used in the financial plan is not intended to predict nor guarantee the actual results of an investment product.



Disclaimer

IMPORTANT: *Investments in stocks, bonds, mutual funds, and other securities are not bank products, are not FDIC insured, and may be subject to loss of principal.*

We have read and understand the above information and disclosures. We understand the basis upon which the report that follows was prepared. We recognize the nature of the asset allocation comparisons and estimated returns as illustrations only. We acknowledge that the report may contain a recommendation for adjusting the asset allocation of our current investment portfolio(s), but it does not provide any guaranteed rates of return, advice on particular securities or any specific legal, tax or accounting advice.

Customer Signature



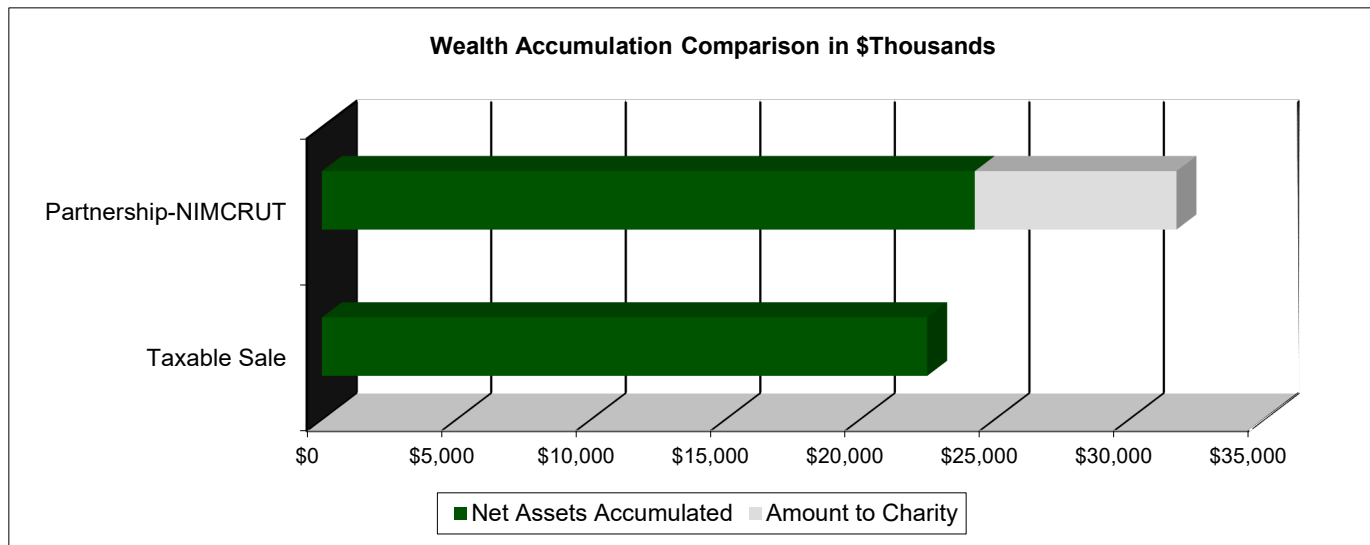
Summary

Jack & Jill Flash

| Projected Results in 2042 | Taxable Sale | Inter Vivos NIMCRUT | NIMCRUT Adv/ -Disadv | PV of Adv/ -Disadv |
|--|-------------------|---------------------|----------------------|--------------------|
| Charitable deduction | NA | 750,150 | 301,560 | 292,862 |
| Cap gains and Medicare taxes on initial sale | 2,430,000 | 0 | 2,430,000 | 2,430,000 |
| Pretax value accumulated | 23,419,192 | 24,900,204 | 1,481,013 | 820,067 |
| Deferred capital gains and Medicare taxes | -922,604 | -634,439 | 288,165 | 159,563 |
| Net assets accumulated | 22,496,588 | 24,265,766 | 1,769,178 | 979,630 |
| Amount to charity | 0 | 7,500,000 | 7,500,000 | 1,609,451 |
| Combined wealth accumulation | 22,496,588 | 31,765,766 | 9,269,178 | 2,589,081 |

| | |
|-------------------------|-----------|
| Undistributed arrearage | 7,928,367 |
|-------------------------|-----------|

On the basis of current assumptions, utilizing a NIMCRUT in this manner will maximize the income beneficiary's after-tax wealth starting in 2039.



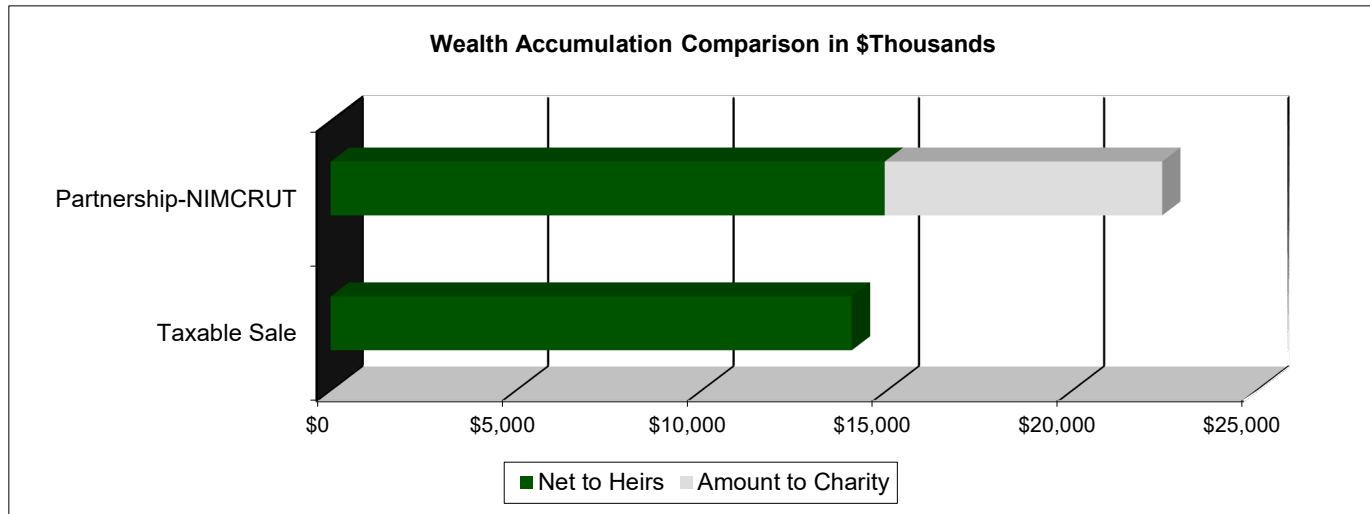
Wealth Transfer Summary

Jack & Jill Flash

| Projected Results in 2042 | Taxable Sale | Inter Vivos NIMCRUT | NIMCRUT Adv/ -Disadv | PV of Adv/ -Disadv |
|--|-------------------|---------------------|----------------------|--------------------|
| Charitable deduction | NA | 750,150 | 301,560 | 292,862 |
| Cap gains and Medicare taxes on initial sale | 2,430,000 | 0 | 2,430,000 | 2,430,000 |
| Pretax value accumulated | 23,419,192 | 24,900,204 | 1,481,013 | 820,067 |
| Estate taxes | -9,367,677 | -9,960,082 | -592,405 | -328,027 |
| Net to heirs | 14,051,515 | 14,940,123 | 888,608 | 492,040 |
| Amount to charity | 0 | 7,500,000 | 7,500,000 | 1,609,451 |
| Combined wealth transfer | 14,051,515 | 22,440,123 | 8,388,608 | 2,101,491 |

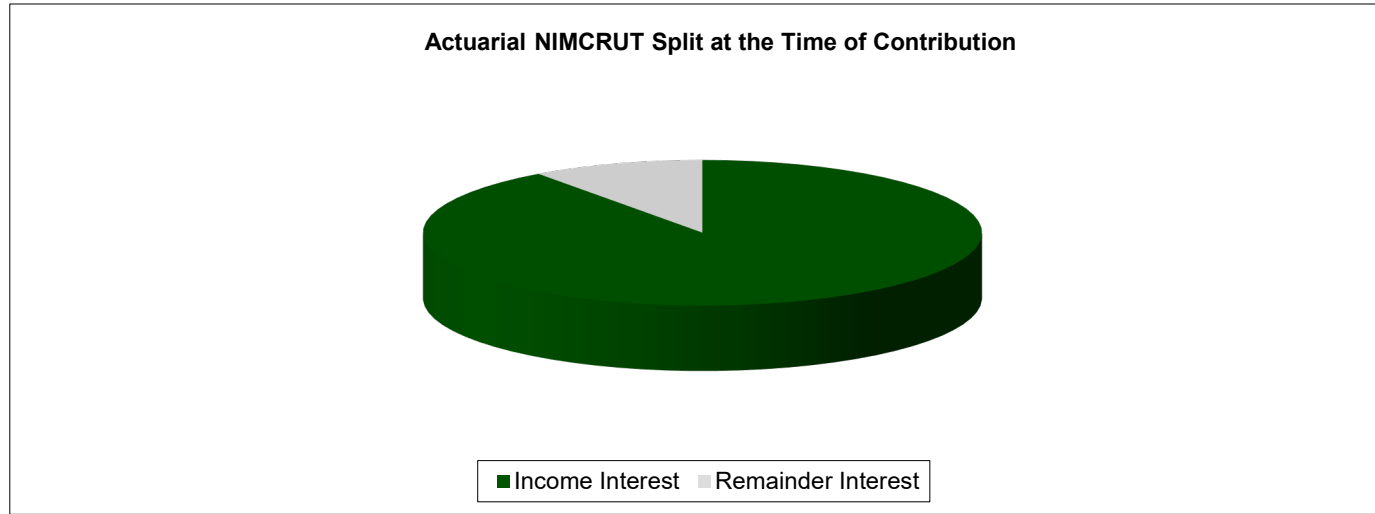
| | |
|-------------------------|-----------|
| Undistributed arrearage | 7,928,367 |
|-------------------------|-----------|

On the basis of current assumptions, utilizing a NIMCRUT in this manner will maximize the family's after-tax wealth starting in 2040.



Actuarial Summary

Jack & Jill Flash



| Relevant Actuarial Calculations & Applicable Tests | |
|--|-------------------|
| NIMCRUT payout rate | 11.375% |
| Income factor | 89.998% |
| Remainder factor | 10.002% |
| 10% actuarial remainder test under IRC sec. 664(d) | Passed |
| Calculation of Charitable Deduction | |
| Amount on which charitable deduction is based | Fair market value |
| Undiscounted value of transfer | 10,000,000 |
| Discounted value of transfer | 7,500,000 |
| Total percentage of remainder interest deductible | 100.0% |
| Remainder factor | 10.002% |
| Tentative deduction | 750,150 |
| Amount deducted each year during the 3-year period starting with the year of transfer | 250,050 |



Assumptions

Jack & Jill Flash

Planning Illustration

| | |
|------------------|-------------|
| Transfer date | 01-Jan-2023 |
| Type of analysis | Inter vivos |
| Transferor | Jack |

Tax Calculations

| | |
|--|------------------------|
| Tax laws to apply - income taxes | TCJA provisions sunset |
| Tax laws to apply - estate, gift & GST | TCJA provisions sunset |

Effective Year for Tax Law Changes

| | |
|--------------------|------|
| Income taxes | 2026 |
| Estate, gift & GST | 2026 |

Trust Assumptions

| | |
|---------------------------------------|---------------|
| Type of trust | Term |
| Trust term | 20 years |
| NIMCRUT payout rate method | Maximum |
| NIMCRUT payout rate | 11.375% |
| NIMCRUT valuation date | Start of year |
| Months valuation date precedes payout | 12 |
| NIMCRUT payout frequency | Annual |
| \$7520 mortality table | 2000CM |

Limited Liability Company-NIMCRUT Arrearage

| | |
|--|-----------|
| Limited liability company distributions | Spigot |
| If applicable, first year of distributions | 11 |
| If Spigot, last year of distributions | 20 |
| If Spigot, first year distribution amount | 2,500,000 |
| If Spigot, inc/-dec rate of distribution amounts | 0.0% |

Charitable Deduction

| | |
|--|-------------------|
| Deduction is based on fair market value or tax basis | Fair market value |
| Total percentage of remainder interest deductible | 100.0% |
| Years needed to utilize deduction | 3 |



Assumptions

Jack & Jill Flash

| Tax Rates | Baseline | NIMCRUT |
|--|-----------------|--------------------|
| Senior Generation | | |
| Federal tax bracket | See schedule | See schedule |
| Federal capital gains tax rate | See schedule | See schedule |
| Federal tax rate on initial sale | 20.0% | NA |
| State income tax rate | 5.0% | 5.0% |
| Charitable income tax deduction rate | NA | See schedule |
| NIMCRUT Investment Rates | | |
| | Income | Growth |
| Pretax rates of return | 2.0% | 6.0% |
| Percentage subject to tax | 100.0% | 50.0% |
| Qualified dividend percentage | 100.0% | NA |
| Other Investment Rates | | |
| | NIMCRUT | Non-NIMCRUT |
| Taxable income rate | Above | 2.0% |
| Qualified dividend percentage | Above | 100.0% |
| Growth rate | Above | 6.0% |
| Tax-exempt income rate | Above | 0.0% |
| Portfolio turnover rate | Above | 25.0% |
| % of short-term capital gains | 50.0% | 50.0% |
| Present value discount rate | NA | 3.0% |
| Discount rate for remainder interest | 8.0% | NA |
| Medicare Surtax | | |
| | Baseline | NIMCRUT |
| % of taxable income and realized gains subject to Medicare surtax in trust | NA | 100.0% |
| % of taxable income and realized gains subject to Medicare surtax outside of trust | 100.0% | 100.0% |
| Other | | |
| Post-contribution gains are allocated to income | | Yes |
| Year initial valuation discount is allocated to fiduciary accounting income | | 1 |
| Show summary results net of deferred capital gains and Medicare taxes | | Yes |



Annual After-Tax Assets Comparison

Jack & Jill Flash

| Year | Taxable Sale Scenario | | | Limited Liability Company-NIMCRUT Scenario - Combined Interests | | | | Limited Liability Company-NIMCRUT Summary | | |
|------|-----------------------|---|-------------------|---|---|-------------------|--------------------------------------|---|-------------------|----------------------|
| | Ending Balance | Deferred Capital Gains & Medicare Taxes | After-Tax Balance | Ending Balance | Deferred Capital Gains & Medicare Taxes | After-Tax Balance | After-Tax Distributable LLC Earnings | NIMCRUT Adv/-Disadv to Income Bene | Amount to Charity | Combined Adv/-Disadv |
| 2023 | 8,094,412 | 91,976 | 8,002,436 | 107,484 | 1,221 | 106,262 | 2,383,500 | -5,512,674 | 10,800,000 | 5,287,326 |
| 2024 | 8,624,919 | 167,329 | 8,457,591 | 222,012 | 3,443 | 218,569 | 2,973,930 | -5,265,092 | 11,664,000 | 6,398,908 |
| 2025 | 9,167,409 | 230,289 | 8,937,120 | 343,743 | 6,501 | 337,242 | 3,605,219 | -4,994,658 | 12,597,120 | 7,602,462 |
| 2026 | 9,723,293 | 281,997 | 9,441,296 | 365,310 | 8,985 | 356,325 | 4,269,614 | -4,815,357 | 13,604,890 | 8,789,532 |
| 2027 | 10,299,380 | 328,760 | 9,970,620 | 387,504 | 11,145 | 376,359 | 4,993,421 | -4,600,840 | 14,693,281 | 10,092,441 |
| 2028 | 10,899,338 | 370,781 | 10,528,557 | 410,494 | 13,032 | 397,463 | 5,774,214 | -4,356,881 | 15,868,743 | 11,511,863 |
| 2029 | 11,526,436 | 409,532 | 11,116,904 | 434,431 | 14,724 | 419,706 | 6,617,010 | -4,080,187 | 17,138,243 | 13,058,055 |
| 2030 | 12,183,667 | 446,158 | 11,737,510 | 459,445 | 16,283 | 443,162 | 7,527,000 | -3,767,347 | 18,509,302 | 14,741,955 |
| 2031 | 12,873,842 | 481,553 | 12,392,288 | 485,656 | 17,753 | 467,903 | 8,509,675 | -3,414,710 | 19,990,046 | 16,575,336 |
| 2032 | 13,599,657 | 516,423 | 13,083,233 | 513,178 | 19,172 | 494,006 | 9,570,907 | -3,018,320 | 21,589,250 | 18,570,930 |
| 2033 | 14,363,757 | 551,329 | 13,812,427 | 2,372,119 | 20,568 | 2,351,551 | 8,887,008 | -2,573,868 | 20,816,390 | 18,242,522 |
| 2034 | 15,168,777 | 586,724 | 14,582,053 | 4,113,232 | 44,033 | 4,069,198 | 8,401,630 | -2,111,225 | 19,981,701 | 17,870,476 |
| 2035 | 16,017,380 | 622,978 | 15,394,401 | 5,800,956 | 82,631 | 5,718,326 | 8,034,542 | -1,641,533 | 19,080,237 | 17,438,704 |
| 2036 | 16,912,286 | 660,403 | 16,251,882 | 7,588,675 | 131,933 | 7,456,743 | 7,621,547 | -1,173,593 | 18,106,656 | 16,933,064 |
| 2037 | 17,856,297 | 699,265 | 17,157,032 | 9,644,859 | 190,469 | 9,454,390 | 6,994,398 | -708,243 | 17,055,189 | 16,346,945 |
| 2038 | 18,852,318 | 739,795 | 18,112,523 | 11,971,128 | 259,169 | 11,711,959 | 6,163,150 | -237,413 | 15,919,604 | 15,682,190 |
| 2039 | 19,903,376 | 782,206 | 19,121,171 | 14,440,821 | 338,748 | 14,102,072 | 5,265,402 | 246,304 | 14,693,172 | 14,939,476 |
| 2040 | 21,012,636 | 826,689 | 20,185,947 | 17,060,738 | 428,218 | 16,632,521 | 4,295,834 | 742,408 | 13,368,626 | 14,111,034 |
| 2041 | 22,183,413 | 873,429 | 21,309,984 | 19,838,478 | 526,916 | 19,311,562 | 3,248,701 | 1,250,279 | 11,938,116 | 13,188,395 |
| 2042 | 23,419,192 | 922,604 | 22,496,588 | 24,900,204 | 634,439 | 24,265,766 | 0 | 1,769,178 | 7,500,000 | 9,269,178 |



Annual Net to Heirs Comparison

Jack & Jill Flash

Part 1 of 2

| Year | Taxable Sale Scenario | | |
|------|-----------------------|------------|--------------|
| | Ending Balance | Estate Tax | Net to Heirs |
| 2023 | 8,094,412 | 3,237,765 | 4,856,647 |
| 2024 | 8,624,919 | 3,449,968 | 5,174,952 |
| 2025 | 9,167,409 | 3,666,964 | 5,500,445 |
| 2026 | 9,723,293 | 3,889,317 | 5,833,976 |
| 2027 | 10,299,380 | 4,119,752 | 6,179,628 |
| 2028 | 10,899,338 | 4,359,735 | 6,539,603 |
| 2029 | 11,526,436 | 4,610,574 | 6,915,861 |
| 2030 | 12,183,667 | 4,873,467 | 7,310,200 |
| 2031 | 12,873,842 | 5,149,537 | 7,724,305 |
| 2032 | 13,599,657 | 5,439,863 | 8,159,794 |
| 2033 | 14,363,757 | 5,745,503 | 8,618,254 |
| 2034 | 15,168,777 | 6,067,511 | 9,101,266 |
| 2035 | 16,017,380 | 6,406,952 | 9,610,428 |
| 2036 | 16,912,286 | 6,764,914 | 10,147,371 |
| 2037 | 17,856,297 | 7,142,519 | 10,713,778 |
| 2038 | 18,852,318 | 7,540,927 | 11,311,391 |
| 2039 | 19,903,376 | 7,961,351 | 11,942,026 |
| 2040 | 21,012,636 | 8,405,054 | 12,607,581 |
| 2041 | 22,183,413 | 8,873,365 | 13,310,048 |
| 2042 | 23,419,192 | 9,367,677 | 14,051,515 |



Annual Net to Heirs Comparison

Jack & Jill Flash

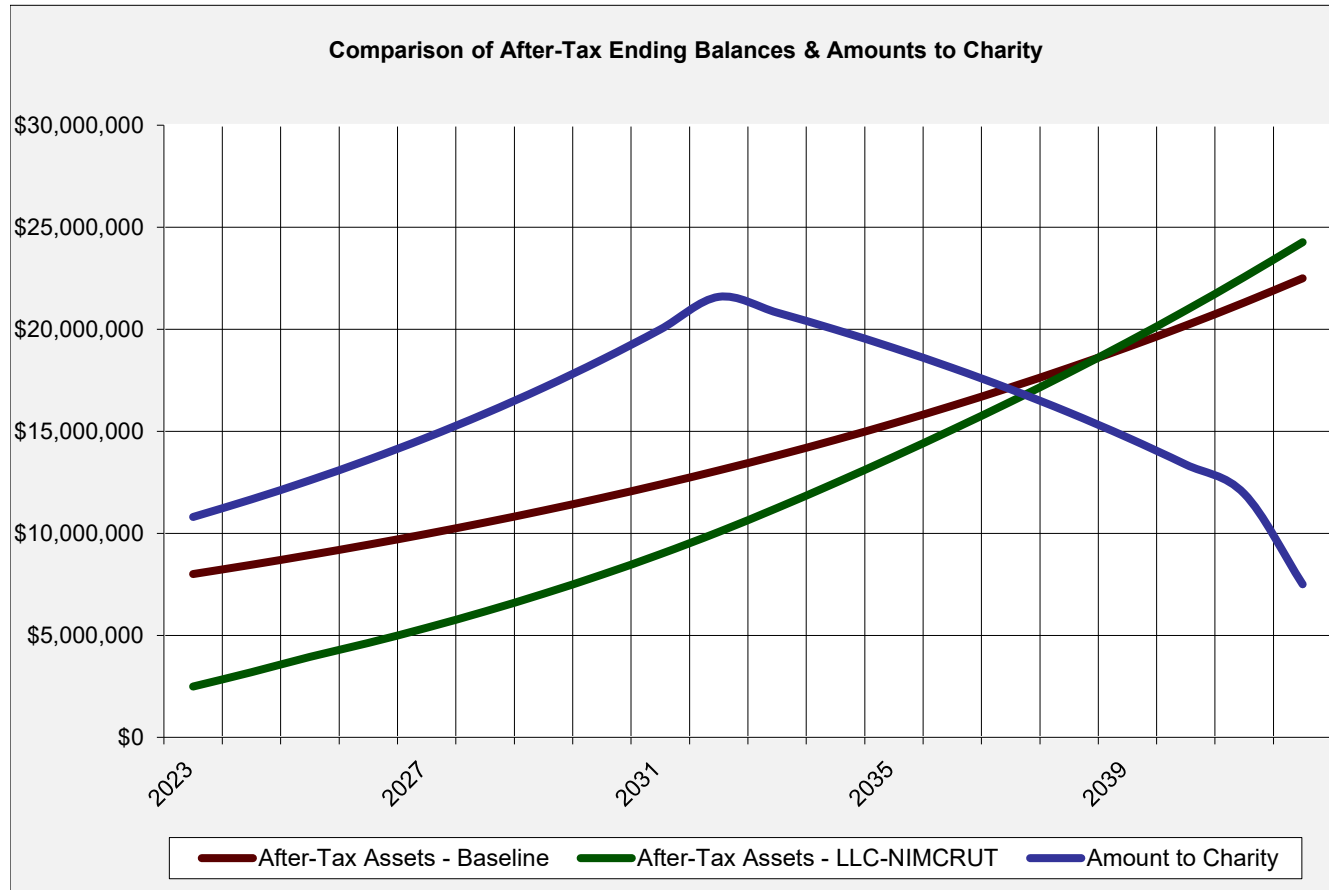
Part 2 of 2

| Year | Limited Liability Company-NIMCRUT Scenario | | | | | | LLC-NIMCRUT Adv/-Disadv | |
|------|--|--------------------------------------|------------------|------------|--------------|-------------------|-----------------------------|-----------------------------|
| | Income Beneficiary Accumulations | After-Tax Distributable LLC Earnings | Combined Balance | Estate Tax | Net to Heirs | Amount to Charity | Excluding Amount to Charity | Including Amount to Charity |
| 2023 | 107,484 | 2,383,500 | 2,490,984 | 996,393 | 1,494,590 | 10,800,000 | -3,362,057 | 7,437,943 |
| 2024 | 222,012 | 2,973,930 | 3,195,942 | 1,278,377 | 1,917,565 | 11,664,000 | -3,257,387 | 8,406,613 |
| 2025 | 343,743 | 3,605,219 | 3,948,963 | 1,579,585 | 2,369,378 | 12,597,120 | -3,131,068 | 9,466,052 |
| 2026 | 365,310 | 4,269,614 | 4,634,925 | 1,853,970 | 2,780,955 | 13,604,890 | -3,053,021 | 10,551,869 |
| 2027 | 387,504 | 4,993,421 | 5,380,925 | 2,152,370 | 3,228,555 | 14,693,281 | -2,951,073 | 11,742,208 |
| 2028 | 410,494 | 5,774,214 | 6,184,708 | 2,473,883 | 3,710,825 | 15,868,743 | -2,828,778 | 13,039,965 |
| 2029 | 434,431 | 6,617,010 | 7,051,441 | 2,820,576 | 4,230,864 | 17,138,243 | -2,684,997 | 14,453,246 |
| 2030 | 459,445 | 7,527,000 | 7,986,445 | 3,194,578 | 4,791,867 | 18,509,302 | -2,518,333 | 15,990,969 |
| 2031 | 485,656 | 8,509,675 | 8,995,331 | 3,598,133 | 5,397,199 | 19,990,046 | -2,327,106 | 17,662,940 |
| 2032 | 513,178 | 9,570,907 | 10,084,085 | 4,033,634 | 6,050,451 | 21,589,250 | -2,109,343 | 19,479,907 |
| 2033 | 2,372,119 | 8,887,008 | 11,259,127 | 4,503,651 | 6,755,476 | 20,816,390 | -1,862,778 | 18,953,612 |
| 2034 | 4,113,232 | 8,401,630 | 12,514,862 | 5,005,945 | 7,508,917 | 19,981,701 | -1,592,349 | 18,389,352 |
| 2035 | 5,800,956 | 8,034,542 | 13,835,499 | 5,534,199 | 8,301,299 | 19,080,237 | -1,309,129 | 17,771,109 |
| 2036 | 7,588,675 | 7,621,547 | 15,210,222 | 6,084,089 | 9,126,133 | 18,106,656 | -1,021,238 | 17,085,418 |
| 2037 | 9,644,859 | 6,994,398 | 16,639,257 | 6,655,703 | 9,983,554 | 17,055,189 | -730,224 | 16,324,965 |
| 2038 | 11,971,128 | 6,163,150 | 18,134,278 | 7,253,711 | 10,880,567 | 15,919,604 | -430,824 | 15,488,780 |
| 2039 | 14,440,821 | 5,265,402 | 19,706,223 | 7,882,489 | 11,823,734 | 14,693,172 | -118,292 | 14,574,880 |
| 2040 | 17,060,738 | 4,295,834 | 21,356,572 | 8,542,629 | 12,813,943 | 13,368,626 | 206,362 | 13,574,988 |
| 2041 | 19,838,478 | 3,248,701 | 23,087,179 | 9,234,871 | 13,852,307 | 11,938,116 | 542,259 | 12,480,375 |
| 2042 | 24,900,204 | 0 | 24,900,204 | 9,960,082 | 14,940,123 | 7,500,000 | 888,608 | 8,388,608 |



Annual After-Tax Assets Illustration

Jack & Jill Flash

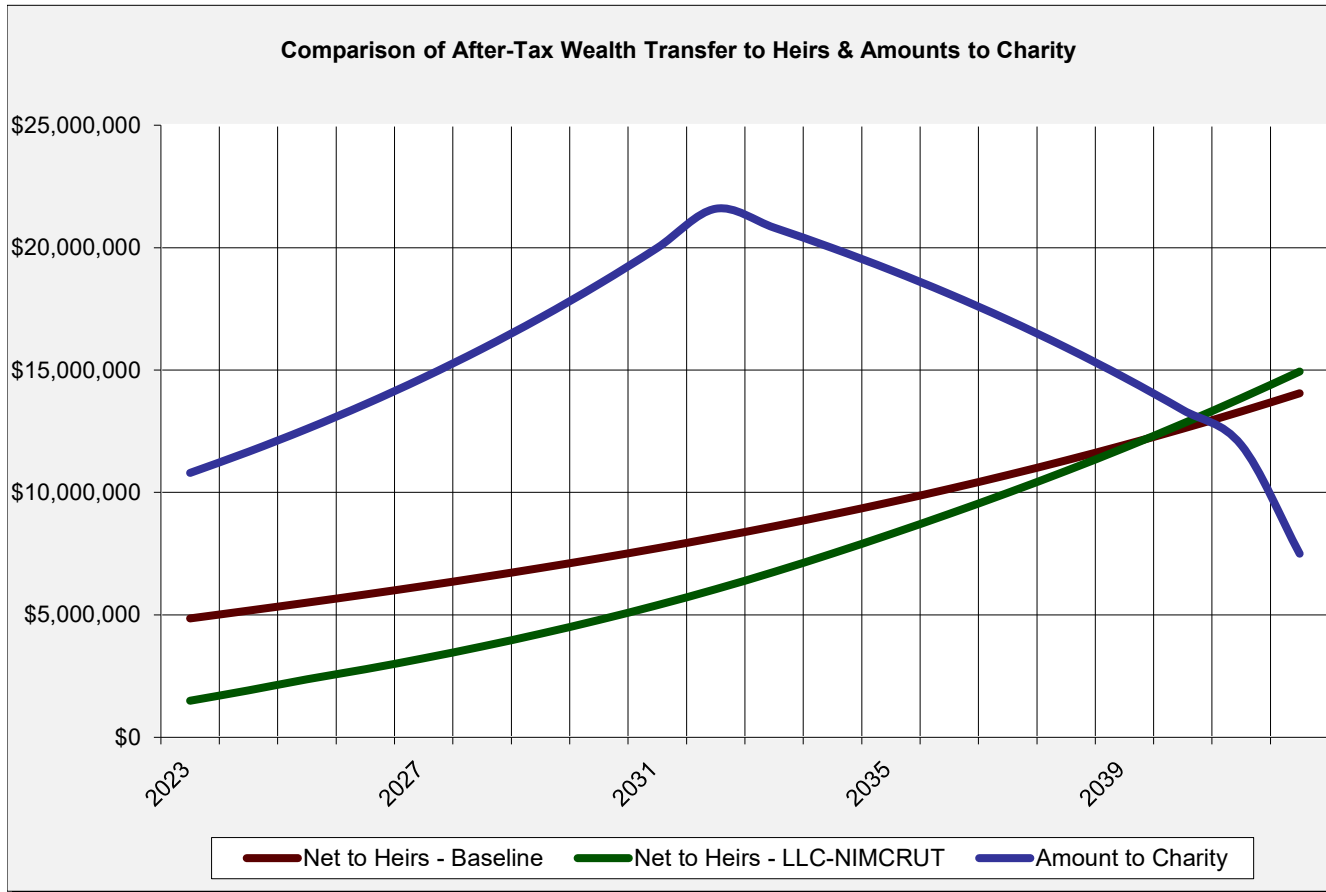


The illustration above compares the after-tax assets available to the income beneficiaries of the NIMCRUT with the assets accumulated by the family in the baseline scenario. The annual year-end values of the NIMCRUT are also shown.



Annual Net to Heirs Illustration

Jack & Jill Flash



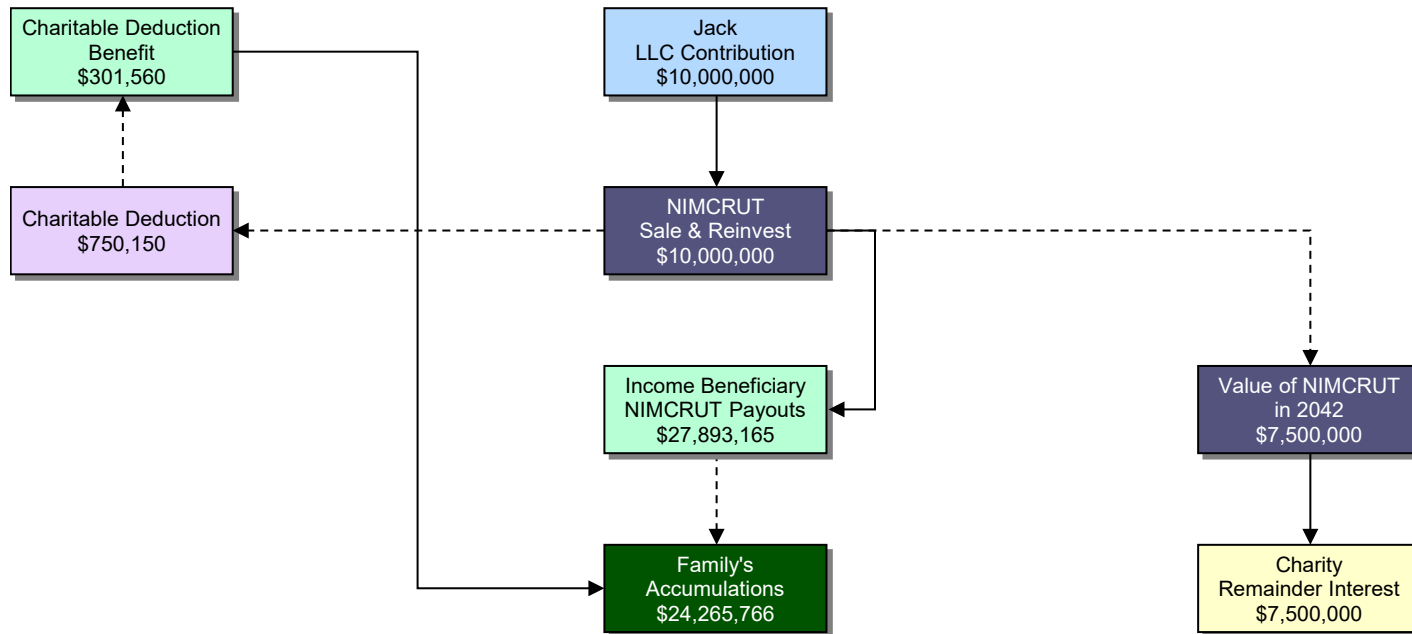
The illustration above compares the after-tax wealth transferred to heirs with a NIMCRUT to the net transfer to heirs in the baseline scenario. The annual year-end values of the NIMCRUT are also shown.



Wealth Accumulation with a Limited Liability Company-NIMCRUT

Jack & Jill Flash

Limited Liability Company-NIMCRUT Illustration



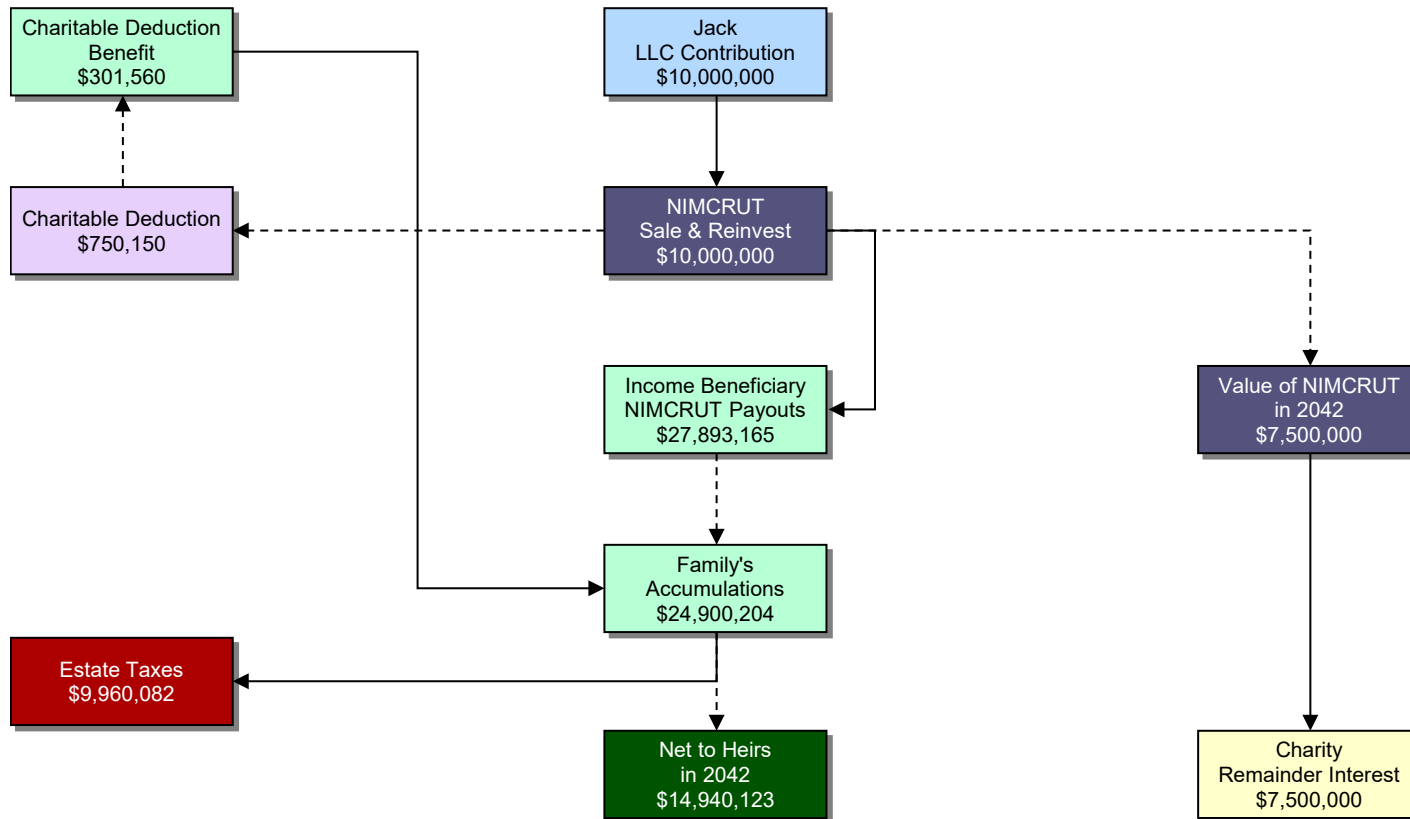
On the basis of current assumptions, utilizing a NIMCRUT in the illustrated manner is projected to produce a net after-tax advantage of \$1,769,178 in 2042, or \$979,630 in today's dollars, not including the amount that ultimately passes to charity.



Wealth Transfer with a Limited Liability Company-NIMCRUT

Jack & Jill Flash

Limited Liability Company-NIMCRUT Illustration



On the basis of current assumptions, utilizing a NIMCRUT in the illustrated manner is projected to produce a net after-tax advantage of \$888,608 in 2042, or \$492,040 in today's dollars, not including the amount that ultimately passes to charity.





LLC NIMCRUT

Sensitivity Analyses

AN ANALYSIS PREPARED EXCLUSIVELY FOR

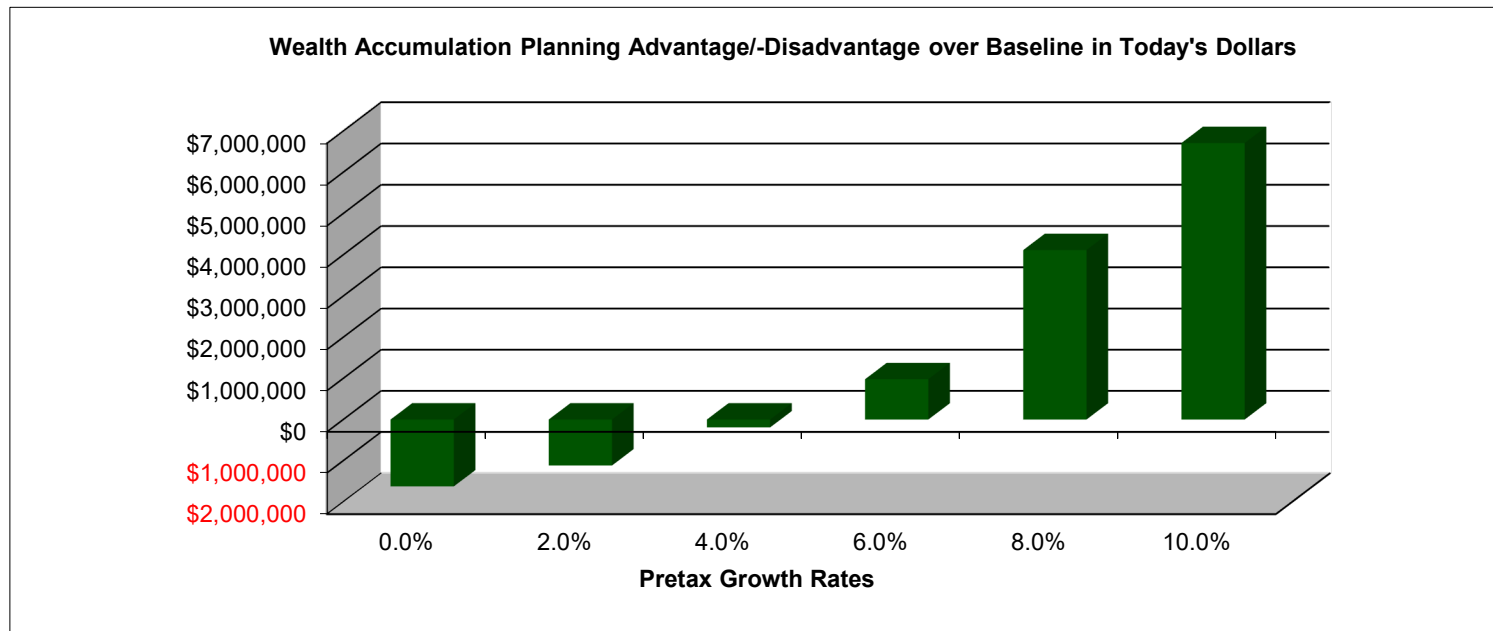
Jack & Jill Flash

Transfer of \$10M LLC Interest to 20-Year Spigot NIMCRUT

Wealth Accumulation Sensitivity Analysis - Growth Rates

Jack & Jill Flash

| 2042 | Limited Liability Company-NIMCRUT Ending Values | | | | Planning Adv-/Disadv | |
|--------|---|--------------------|--------------------|------------|--------------------------|-------------------|
| Growth | Baseline | Cumulative Payouts | Income Beneficiary | Charity | Projected to Income Bene | PV to Income Bene |
| 0.0% | 10,122,414 | 8,305,764 | 7,187,257 | 5,203,607 | -2,935,157 | -1,625,257 |
| 2.0% | 13,164,005 | 12,538,330 | 11,146,744 | 5,538,980 | -2,017,261 | -1,116,999 |
| 4.0% | 17,183,490 | 18,690,861 | 16,838,100 | 5,819,069 | -345,390 | -191,249 |
| 6.0% | 22,496,588 | 27,893,165 | 24,265,766 | 7,500,000 | 1,769,178 | 979,630 |
| 8.0% | 29,518,384 | 44,931,438 | 36,948,306 | 7,500,000 | 7,429,922 | 4,114,101 |
| 10.0% | 38,793,240 | 63,786,349 | 50,906,806 | 13,804,744 | 12,113,567 | 6,707,531 |



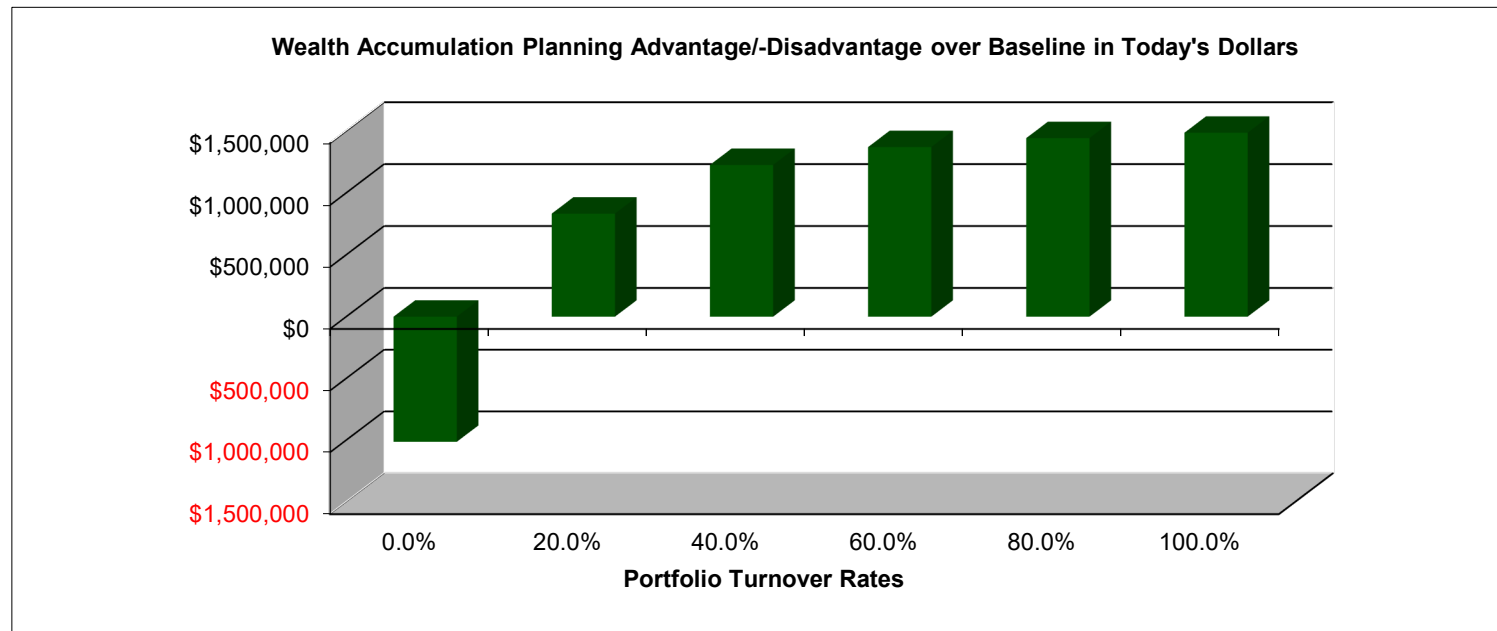
The illustration above shows the impact of pretax growth rate assumptions (inside and outside the trust) on the projected results. The graph shows the advantages or disadvantages of a NIMCRUT, as compared to the baseline scenario, in today's dollars. Note that all other assumptions are the same as those listed on the Assumptions schedule.



Wealth Accumulation Sensitivity Analysis - Turnover Rates

Jack & Jill Flash

| 2042 Turnover | Baseline | Limited Liability Company-NIMCRUT Ending Values | | | Planning Adv/-Disadv | |
|------------------|------------|---|--------------------|-----------|--------------------------|-------------------|
| | | Cumulative Payouts | Income Beneficiary | Charity | Projected to Income Bene | PV to Income Bene |
| 0.0% | 26,688,074 | 27,893,165 | 24,857,662 | 7,500,000 | -1,830,412 | -1,013,537 |
| 20.0% | 22,836,151 | 27,893,165 | 24,339,356 | 7,500,000 | 1,503,205 | 832,356 |
| 40.0% | 21,895,280 | 27,893,165 | 24,108,449 | 7,500,000 | 2,213,169 | 1,225,477 |
| 60.0% | 21,509,665 | 27,893,165 | 23,983,565 | 7,500,000 | 2,473,901 | 1,369,850 |
| 80.0% | 21,302,512 | 27,893,165 | 23,907,248 | 7,500,000 | 2,604,736 | 1,442,296 |
| 100.0% | 21,173,393 | 27,893,165 | 23,856,290 | 7,500,000 | 2,682,898 | 1,485,576 |



The illustration above shows the impact of portfolio turnover rate assumptions (inside and outside the trust) on the projected results. The graph shows the advantages or disadvantages of a NIMCRUT, as compared to the baseline scenario, in today's dollars. Note that all other assumptions are the same as those listed on the Assumptions schedule.

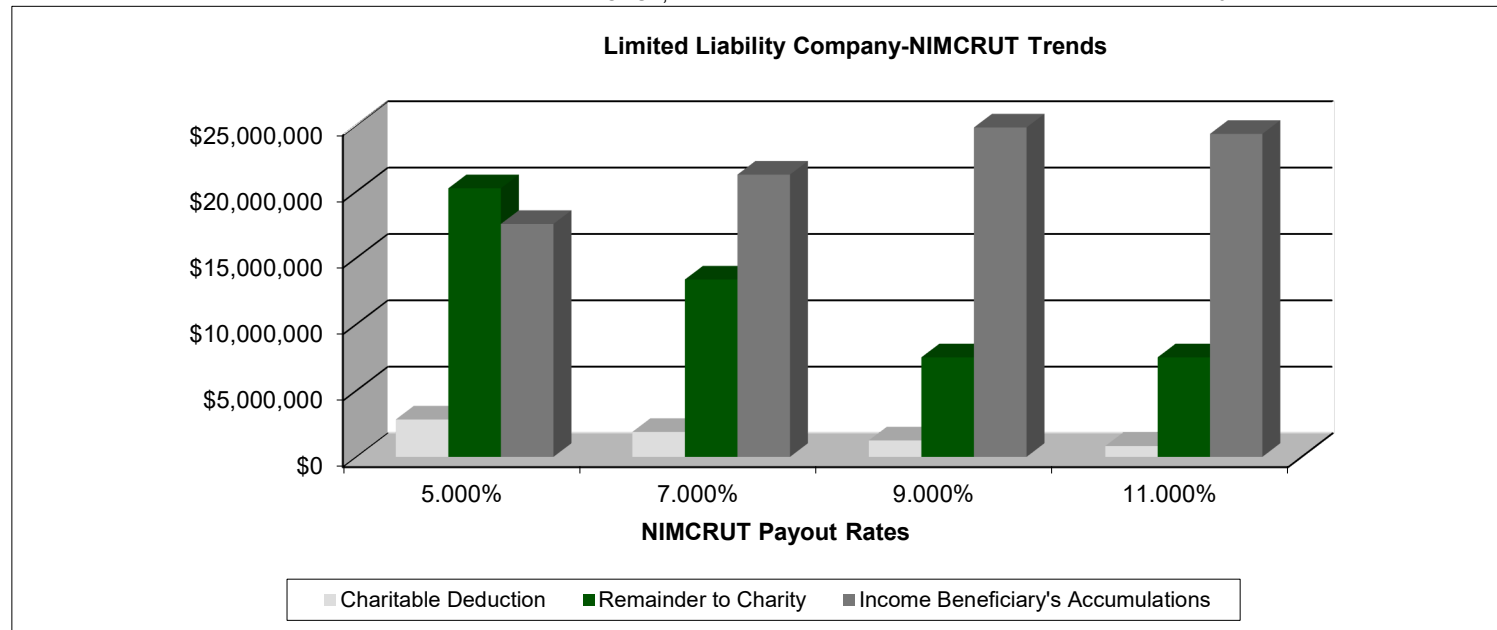


Wealth Accumulation Sensitivity Analysis - Payout Rates

Jack & Jill Flash

| 2042 Payout | Charity | | Income Beneficiary | | Planning Adv/-Disadv | |
|----------------|----------------------|-----------------|--------------------|--------------|--------------------------|-------------------|
| | Charitable Deduction | Remainder Value | Cumulative Payouts | Ending Value | Projected to Income Bene | PV to Income Bene |
| 5.000% | 2,816,168 | 20,238,834 | 16,731,390 | 17,552,910 | -4,943,678 | -2,737,416 |
| 7.000% | 1,877,295 | 13,362,062 | 22,134,435 | 21,269,034 | -1,227,554 | -679,722 |
| 9.000% | 1,240,545 | 7,500,000 | 27,893,165 | 24,821,113 | 2,324,525 | 1,287,137 |
| 11.000% | 812,963 | 7,500,000 | 27,893,165 | 24,336,898 | 1,840,310 | 1,019,017 |
| 13.000% | NA | NA | NA | NA | NA | NA |
| 15.000% | NA | NA | NA | NA | NA | NA |

NA = a trust that is not a valid NIMCRUT; the actuarial value of the remainder interest is less than 10%.



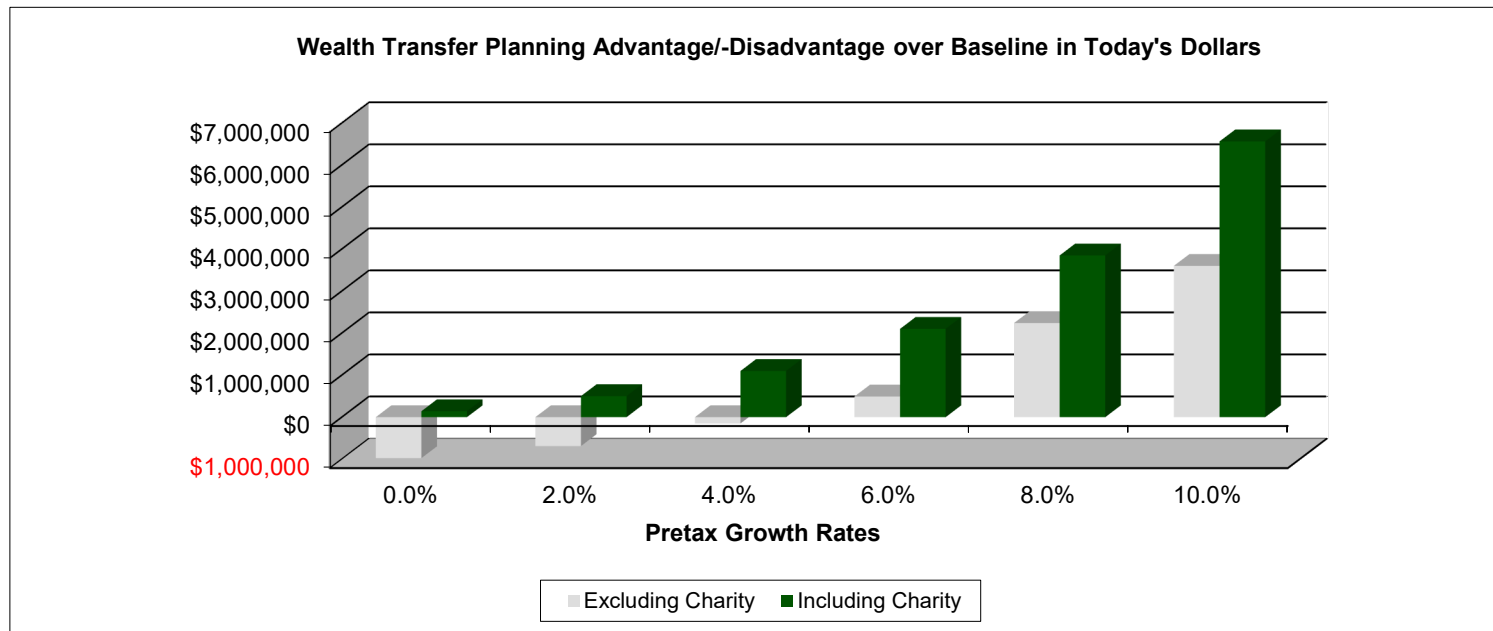
The illustration above shows the impact of the NIMCRUT payout rate assumption on the projected results. The graph shows the relationship between the NIMCRUT payout rate and a) the charitable deduction, b) the ending value to charity and c) the income beneficiary's accumulations. All other assumptions are the same as those listed on the Assumptions schedule.



Wealth Transfer Sensitivity Analysis - Growth Rates

Jack & Jill Flash

| 2042 Growth | Baseline Net to Heirs | Wealth Transfer with NIMCRUT | | | Projected NIMCRUT Adv/-Disadv | |
|----------------|-----------------------------|------------------------------|----------------------|----------------------|--------------------------------|--------------------------------|
| | | Net to Heirs | Amount to Charity | Combined Transfer | Excluding Amount to Charity | Including Amount to Charity |
| 0.0% | 6,073,449 | 4,312,354 | 5,203,607 | 9,515,962 | -1,761,094 | 3,442,513 |
| 2.0% | 8,014,107 | 6,772,056 | 5,538,980 | 12,311,036 | -1,242,051 | 4,296,929 |
| 4.0% | 10,601,935 | 10,332,527 | 5,819,069 | 16,151,595 | -269,408 | 5,549,660 |
| 6.0% | 14,051,515 | 14,940,123 | 7,500,000 | 22,440,123 | 888,608 | 8,388,608 |
| 8.0% | 18,646,365 | 22,689,405 | 7,500,000 | 30,189,405 | 4,043,040 | 11,543,040 |
| 10.0% | 24,760,038 | 31,261,224 | 13,804,744 | 45,065,968 | 6,501,186 | 20,305,931 |



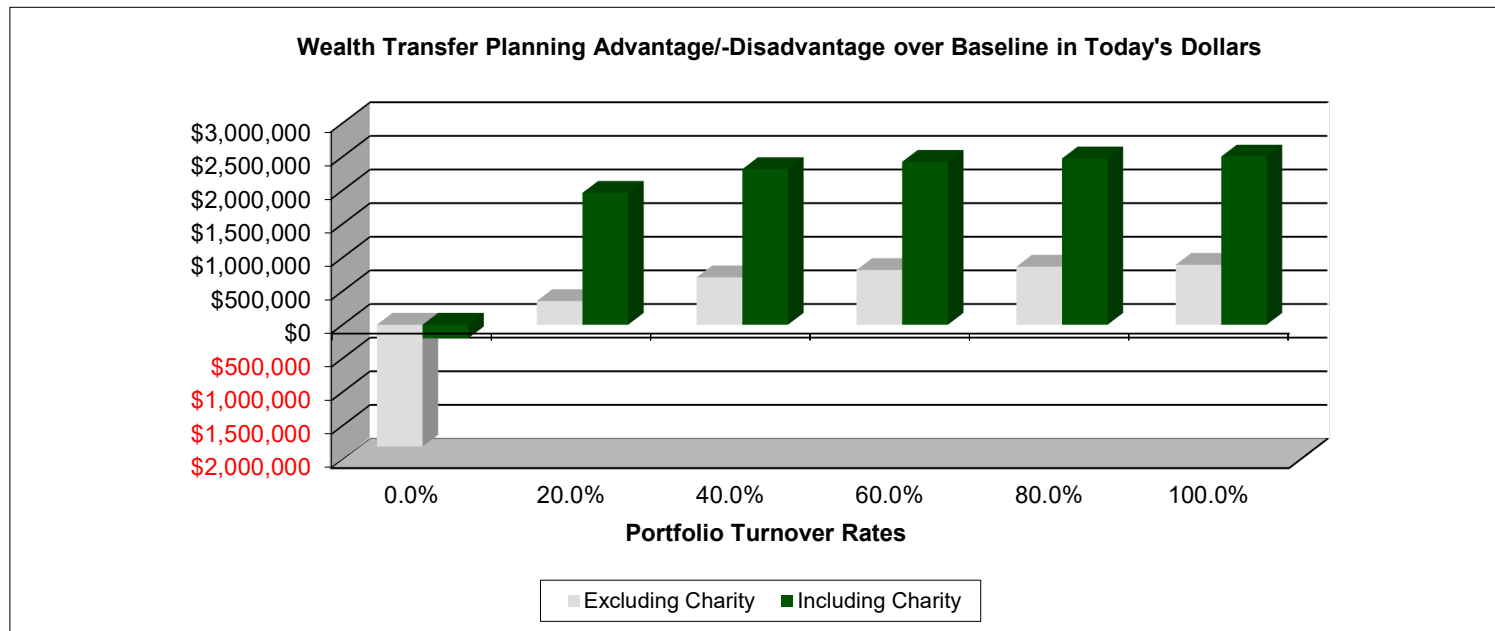
The illustration above shows the impact of pretax growth rate assumptions (inside and outside the trust) on the projected results. The graph shows the advantages or disadvantages of a NIMCRUT, as compared to the baseline scenario, in today's dollars. Note that all other assumptions are the same as those listed on the Assumptions schedule.



Wealth Transfer Sensitivity Analysis - Turnover Rates

Jack & Jill Flash

| 2042 Turnover | Baseline Net to Heirs | Wealth Transfer with NIMCRUT | | | Projected NIMCRUT Adv/-Disadv | |
|------------------|-----------------------------|------------------------------|----------------------|----------------------|--------------------------------|--------------------------------|
| | | Net to Heirs | Amount to Charity | Combined Transfer | Excluding Amount to Charity | Including Amount to Charity |
| 0.0% | 19,162,787 | 15,891,049 | 7,500,000 | 23,391,049 | -3,271,737 | 4,228,263 |
| 20.0% | 14,421,099 | 15,056,777 | 7,500,000 | 22,556,777 | 635,678 | 8,135,678 |
| 40.0% | 13,422,241 | 14,693,933 | 7,500,000 | 22,193,933 | 1,271,692 | 8,771,692 |
| 60.0% | 13,034,106 | 14,502,990 | 7,500,000 | 22,002,990 | 1,468,884 | 8,968,884 |
| 80.0% | 12,829,882 | 14,388,836 | 7,500,000 | 21,888,836 | 1,558,954 | 9,058,954 |
| 100.0% | 12,704,036 | 14,313,774 | 7,500,000 | 21,813,774 | 1,609,739 | 9,109,739 |



The illustration above shows the impact of portfolio turnover rate assumptions (inside and outside the trust) on the projected results. The graph shows the advantages or disadvantages of a NIMCRUT, as compared to the baseline scenario, in today's dollars. Note that all other assumptions are the same as those listed on the Assumptions schedule.

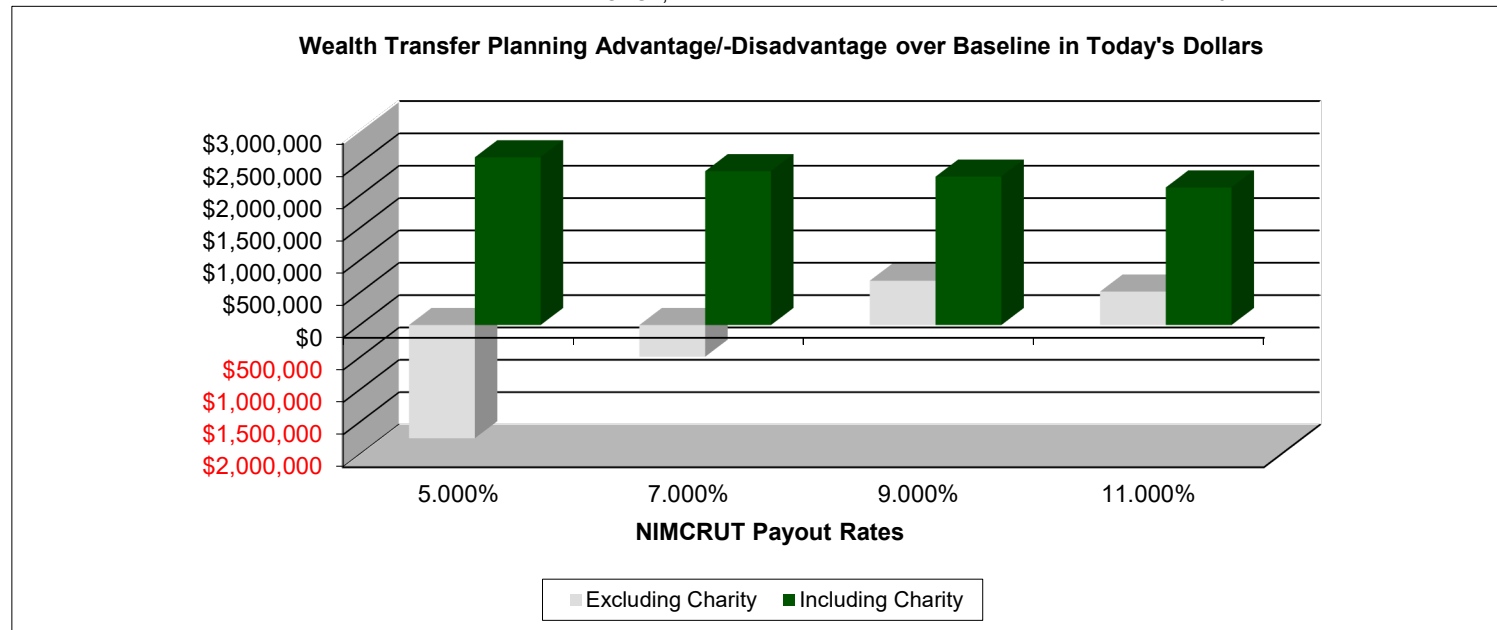


Wealth Transfer Sensitivity Analysis - Payout Rates

Jack & Jill Flash

| 2042 Payout | Wealth Transfer with NIMCRUT | | Projected NIMCRUT Adv/-Disadv | | Projected NIMCRUT Adv/-Disadv | |
|----------------|------------------------------|-------------------|-------------------------------|-----------------------------|-------------------------------|-----------------------------|
| | Net to Heirs | Amount to Charity | Excluding Amount to Charity | Including Amount to Charity | Excluding Amount to Charity | Including Amount to Charity |
| 5.000% | 10,890,623 | 20,238,834 | -3,160,892 | 17,077,941 | -1,750,251 | 2,592,869 |
| 7.000% | 13,166,631 | 13,362,062 | -884,884 | 12,477,178 | -489,979 | 2,377,432 |
| 9.000% | 15,286,988 | 7,500,000 | 1,235,472 | 8,735,472 | 684,106 | 2,293,557 |
| 11.000% | 14,984,551 | 7,500,000 | 933,036 | 8,433,036 | 516,641 | 2,126,092 |
| 13.000% | NA | NA | NA | NA | NA | NA |
| 15.000% | NA | NA | NA | NA | NA | NA |

NA = a trust that is not a valid NIMCRUT; the actuarial value of the remainder interest is less than 10%.



The illustration above shows the impact of NIMCRUT payout rate assumptions on the projected results. The graph shows the advantages or disadvantages of a NIMCRUT, as compared to the baseline scenario, in today's dollars. Note that all other assumptions are the same as those listed on the Assumptions schedule.





LLC NIMCRUT

Supporting Schedules for
BASELINE SCENARIO

AN ANALYSIS PREPARED EXCLUSIVELY FOR

Jack & Jill Flash

Transfer of \$10M LLC Interest to 20-Year Spigot NIMCRUT

Taxable Sale Illustration

Jack & Jill Flash

| Year | Beginning Balance | Current-Year Returns | | Realized Short-Term Capital Gains 12.5% | Realized Long-Term Capital Gains 12.5% | Unrealized Gains | Taxes | | | Ending Balance |
|-------|-------------------|----------------------|-------------|---|--|------------------|-------------------------|--------------------------------|-------------------------------|----------------|
| | | Ordinary Income 2.0% | Growth 6.0% | | | | Income & Medicare Taxes | Short-Term Capital Gains Taxes | Long-Term Capital Gains Taxes | |
| Start | 10,000,000 | 0 | 0 | 0 | 9,000,000 | 0 | 342,000 | 0 | 2,088,000 | 7,570,000 |
| 2023 | 7,570,000 | 151,400 | 454,200 | 56,775 | 56,775 | 340,650 | 10,068 | 22,824 | 48,297 | 8,094,412 |
| 2024 | 8,094,412 | 161,888 | 485,665 | 103,289 | 103,289 | 619,736 | 14,002 | 41,522 | 61,521 | 8,624,919 |
| 2025 | 8,624,919 | 172,498 | 517,495 | 142,154 | 142,154 | 852,923 | 17,359 | 57,146 | 72,999 | 9,167,409 |
| 2026 | 9,167,409 | 183,348 | 550,045 | 175,371 | 175,371 | 1,052,226 | 20,295 | 74,708 | 82,505 | 9,723,293 |
| 2027 | 9,723,293 | 194,466 | 583,398 | 204,453 | 204,453 | 1,226,718 | 22,928 | 87,097 | 91,751 | 10,299,380 |
| 2028 | 10,299,380 | 205,988 | 617,963 | 230,585 | 230,585 | 1,383,510 | 25,352 | 98,229 | 100,412 | 10,899,338 |
| 2029 | 10,899,338 | 217,987 | 653,960 | 254,684 | 254,684 | 1,528,103 | 27,639 | 108,495 | 108,714 | 11,526,436 |
| 2030 | 11,526,436 | 230,529 | 691,586 | 277,461 | 277,461 | 1,664,767 | 29,847 | 118,198 | 116,838 | 12,183,667 |
| 2031 | 12,183,667 | 243,673 | 731,020 | 299,473 | 299,473 | 1,796,840 | 32,020 | 127,576 | 124,924 | 12,873,842 |
| 2032 | 12,873,842 | 257,477 | 772,430 | 321,159 | 321,159 | 1,926,953 | 34,192 | 136,814 | 133,086 | 13,599,657 |
| 2033 | 13,599,657 | 271,993 | 815,979 | 342,867 | 342,867 | 2,057,199 | 36,394 | 146,061 | 141,418 | 14,363,757 |
| 2034 | 14,363,757 | 287,275 | 861,825 | 364,878 | 364,878 | 2,189,269 | 38,647 | 155,438 | 149,995 | 15,168,777 |
| 2035 | 15,168,777 | 303,376 | 910,127 | 387,424 | 387,424 | 2,324,546 | 40,973 | 165,043 | 158,884 | 16,017,380 |
| 2036 | 16,017,380 | 320,348 | 961,043 | 410,699 | 410,699 | 2,464,192 | 43,386 | 174,958 | 168,141 | 16,912,286 |
| 2037 | 16,912,286 | 338,246 | 1,014,737 | 434,866 | 434,866 | 2,609,197 | 45,903 | 185,253 | 177,816 | 17,856,297 |
| 2038 | 17,856,297 | 357,126 | 1,071,378 | 460,072 | 460,072 | 2,760,431 | 48,536 | 195,991 | 187,955 | 18,852,318 |
| 2039 | 18,852,318 | 377,046 | 1,131,139 | 486,446 | 486,446 | 2,918,677 | 51,298 | 207,226 | 198,603 | 19,903,376 |
| 2040 | 19,903,376 | 398,068 | 1,194,203 | 514,110 | 514,110 | 3,084,660 | 54,199 | 219,011 | 209,801 | 21,012,636 |
| 2041 | 21,012,636 | 420,253 | 1,260,758 | 543,177 | 543,177 | 3,259,064 | 57,251 | 231,394 | 221,589 | 22,183,413 |
| 2042 | 22,183,413 | 443,668 | 1,331,005 | 573,759 | 573,759 | 3,442,551 | 60,465 | 244,421 | 234,008 | 23,419,192 |





LLC NIMCRUT

Supporting Schedules for
LIMITED LIABILITY COMPANY-NIMCRUT SCENARIO

AN ANALYSIS PREPARED EXCLUSIVELY FOR

Jack & Jill Flash

Transfer of \$10M LLC Interest to 20-Year Spigot NIMCRUT

Annual After-Tax Wealth to NIMCRUT Income Beneficiaries & Charity

Jack & Jill Flash

| Year | Income Beneficiaries' After-Tax Accumulations | | | | Potential Distributions to Beneficiaries | | | Aggregate Income Beneficiaries' Wealth | Remainder Interest to Charity |
|------|---|------------------|---|-------------------|--|---------------------------------|----------------------|--|-------------------------------|
| | Ending Balance | Unrealized Gains | Deferred Capital Gains & Medicare Taxes | After-Tax Balance | After-Tax LLC Earnings (A) | After-Tax NIMCRUT Arrearage (B) | Lesser of (A) or (B) | | |
| 2023 | 107,484 | 4,523 | 1,221 | 106,262 | 2,383,500 | 597,281 | 597,281 | 703,544 | 9,946,875 |
| 2024 | 222,012 | 12,753 | 3,443 | 218,569 | 2,973,930 | 1,453,796 | 1,453,796 | 1,672,365 | 9,582,375 |
| 2025 | 343,743 | 24,078 | 6,501 | 337,242 | 3,605,219 | 2,372,457 | 2,372,457 | 2,709,700 | 9,188,715 |
| 2026 | 365,310 | 33,527 | 8,985 | 356,325 | 4,269,614 | 3,344,687 | 3,344,687 | 3,701,012 | 8,763,562 |
| 2027 | 387,504 | 41,584 | 11,145 | 376,359 | 4,993,421 | 4,404,602 | 4,404,602 | 4,780,961 | 8,304,397 |
| 2028 | 410,494 | 48,626 | 13,032 | 397,463 | 5,774,214 | 5,548,392 | 5,548,392 | 5,945,855 | 7,808,499 |
| 2029 | 434,431 | 54,942 | 14,724 | 419,706 | 6,617,010 | 6,617,010 | 6,617,010 | 7,036,716 | 7,500,000 |
| 2030 | 459,445 | 60,756 | 16,283 | 443,162 | 7,527,000 | 7,527,000 | 7,527,000 | 7,970,162 | 7,500,000 |
| 2031 | 485,656 | 66,242 | 17,753 | 467,903 | 8,509,675 | 8,509,675 | 8,509,675 | 8,977,579 | 7,500,000 |
| 2032 | 513,178 | 71,536 | 19,172 | 494,006 | 9,570,907 | 9,570,907 | 9,570,907 | 10,064,913 | 7,500,000 |
| 2033 | 2,372,119 | 76,745 | 20,568 | 2,351,551 | 8,887,008 | 8,887,008 | 8,887,008 | 11,238,559 | 7,500,000 |
| 2034 | 4,113,232 | 164,304 | 44,033 | 4,069,198 | 8,401,630 | 8,401,630 | 8,401,630 | 12,470,828 | 7,500,000 |
| 2035 | 5,800,956 | 308,323 | 82,631 | 5,718,326 | 8,034,542 | 8,034,542 | 8,034,542 | 13,752,868 | 7,500,000 |
| 2036 | 7,588,675 | 492,286 | 131,933 | 7,456,743 | 7,621,547 | 7,621,547 | 7,621,547 | 15,078,290 | 7,500,000 |
| 2037 | 9,644,859 | 710,705 | 190,469 | 9,454,390 | 6,994,398 | 6,994,398 | 6,994,398 | 16,448,788 | 7,500,000 |
| 2038 | 11,971,128 | 967,047 | 259,169 | 11,711,959 | 6,163,150 | 6,163,150 | 6,163,150 | 17,875,109 | 7,500,000 |
| 2039 | 14,440,821 | 1,263,986 | 338,748 | 14,102,072 | 5,265,402 | 5,265,402 | 5,265,402 | 19,367,474 | 7,500,000 |
| 2040 | 17,060,738 | 1,597,827 | 428,218 | 16,632,521 | 4,295,834 | 4,295,834 | 4,295,834 | 20,928,355 | 7,500,000 |
| 2041 | 19,838,478 | 1,966,103 | 526,916 | 19,311,562 | 3,248,701 | 3,248,701 | 3,248,701 | 22,560,263 | 7,500,000 |
| 2042 | 24,900,204 | 2,367,309 | 634,439 | 24,265,766 | 0 | 0 | 0 | 24,265,766 | 7,500,000 |



Limited Liability Company-NIMCRUT Illustration

Jack & Jill Flash

Part 1 of 3

| Year | Beginning Balance | Current-Year Returns | | Realized Short-Term Capital Gains | Realized Long-Term Capital Gains | Unrealized Gains |
|-------|-------------------|----------------------|-----------|-----------------------------------|----------------------------------|------------------|
| | | Taxable Income | Growth | | | |
| Start | 10,000,000 | | | | 9,000,000 | 0 |
| 2023 | 10,000,000 | 200,000 | 600,000 | 150,000 | 2,650,000 | 300,000 |
| 2024 | 10,800,000 | 216,000 | 648,000 | 237,000 | 237,000 | 474,000 |
| 2025 | 11,664,000 | 233,280 | 699,840 | 293,460 | 293,460 | 586,920 |
| 2026 | 12,597,120 | 251,942 | 755,827 | 335,687 | 335,687 | 671,374 |
| 2027 | 13,604,890 | 272,098 | 816,293 | 371,917 | 371,917 | 743,833 |
| 2028 | 14,693,281 | 293,866 | 881,597 | 406,358 | 406,358 | 812,715 |
| 2029 | 15,868,743 | 317,375 | 952,125 | 441,210 | 441,210 | 882,420 |
| 2030 | 17,138,243 | 342,765 | 1,028,295 | 477,679 | 477,679 | 955,357 |
| 2031 | 18,509,302 | 370,186 | 1,110,558 | 516,479 | 516,479 | 1,032,958 |
| 2032 | 19,990,046 | 399,801 | 1,199,403 | 558,090 | 558,090 | 1,116,180 |
| 2033 | 21,589,250 | 431,785 | 1,295,355 | 602,884 | 602,884 | 1,205,768 |
| 2034 | 20,816,390 | 416,328 | 1,248,983 | 613,688 | 613,688 | 1,227,376 |
| 2035 | 19,981,701 | 399,634 | 1,198,902 | 606,569 | 606,569 | 1,213,139 |
| 2036 | 19,080,237 | 381,605 | 1,144,814 | 589,488 | 589,488 | 1,178,977 |
| 2037 | 18,106,656 | 362,133 | 1,086,399 | 566,344 | 566,344 | 1,132,688 |
| 2038 | 17,055,189 | 341,104 | 1,023,311 | 539,000 | 539,000 | 1,078,000 |
| 2039 | 15,919,604 | 318,392 | 955,176 | 508,294 | 508,294 | 1,016,588 |
| 2040 | 14,693,172 | 293,863 | 881,590 | 474,545 | 474,545 | 949,089 |
| 2041 | 13,368,626 | 267,373 | 802,118 | 437,802 | 437,802 | 875,603 |
| 2042 | 11,938,116 | 238,762 | 716,287 | 397,973 | 1,193,918 | 0 |



Limited Liability Company-NIMCRUT Illustration

Jack & Jill Flash

Part 2 of 3

| Year | Valuation for Payout | End of Year Scheduled Payout 11.375% | NIMCRUT Accounting | | | | | | Ending Balance |
|-------|----------------------|--------------------------------------|----------------------------|-------------------|-----------------------------|-----------------------------|---------------|-----------------------|----------------|
| | | | Undistributed LLC Earnings | LLC Distributions | Fiduciary Accounting Income | Beginning of Year Arrearage | Actual Payout | End of Year Arrearage | |
| Start | | | 0 | | | | | 0 | 10,000,000 |
| 2023 | 7,500,000 | 853,125 | 3,000,000 | 0 | 0 | 0 | 0 | 853,125 | 10,800,000 |
| 2024 | 10,800,000 | 1,228,500 | 3,690,000 | 0 | 0 | 853,125 | 0 | 2,081,625 | 11,664,000 |
| 2025 | 11,664,000 | 1,326,780 | 4,510,200 | 0 | 0 | 2,081,625 | 0 | 3,408,405 | 12,597,120 |
| 2026 | 12,597,120 | 1,432,922 | 5,433,516 | 0 | 0 | 3,408,405 | 0 | 4,841,327 | 13,604,890 |
| 2027 | 13,604,890 | 1,547,556 | 6,449,447 | 0 | 0 | 4,841,327 | 0 | 6,388,884 | 14,693,281 |
| 2028 | 14,693,281 | 1,671,361 | 7,556,028 | 0 | 0 | 6,388,884 | 0 | 8,060,244 | 15,868,743 |
| 2029 | 15,868,743 | 1,805,070 | 8,755,823 | 0 | 0 | 8,060,244 | 0 | 9,865,314 | 17,138,243 |
| 2030 | 17,138,243 | 1,949,475 | 10,053,945 | 0 | 0 | 9,865,314 | 0 | 11,814,789 | 18,509,302 |
| 2031 | 18,509,302 | 2,105,433 | 11,457,089 | 0 | 0 | 11,814,789 | 0 | 13,920,222 | 19,990,046 |
| 2032 | 19,990,046 | 2,273,868 | 12,973,070 | 0 | 0 | 13,920,222 | 0 | 16,194,090 | 21,589,250 |
| 2033 | 21,589,250 | 2,455,777 | 14,610,622 | 2,500,000 | 2,500,000 | 16,194,090 | 2,500,000 | 16,149,867 | 20,816,390 |
| 2034 | 20,816,390 | 2,367,864 | 13,754,326 | 2,500,000 | 2,500,000 | 16,149,867 | 2,500,000 | 16,017,731 | 19,981,701 |
| 2035 | 19,981,701 | 2,272,919 | 12,867,098 | 2,500,000 | 2,500,000 | 16,017,731 | 2,500,000 | 15,790,650 | 19,080,237 |
| 2036 | 19,080,237 | 2,170,377 | 11,927,680 | 2,500,000 | 2,500,000 | 15,790,650 | 2,500,000 | 15,461,027 | 18,106,656 |
| 2037 | 18,106,656 | 2,059,632 | 10,922,501 | 2,500,000 | 2,500,000 | 15,461,027 | 2,500,000 | 15,020,659 | 17,055,189 |
| 2038 | 17,055,189 | 1,940,028 | 9,841,604 | 2,500,000 | 2,500,000 | 15,020,659 | 2,500,000 | 14,460,687 | 15,919,604 |
| 2039 | 15,919,604 | 1,810,855 | 8,676,584 | 2,500,000 | 2,500,000 | 14,460,687 | 2,500,000 | 13,771,542 | 14,693,172 |
| 2040 | 14,693,172 | 1,671,348 | 7,419,537 | 2,500,000 | 2,500,000 | 13,771,542 | 2,500,000 | 12,942,890 | 13,368,626 |
| 2041 | 13,368,626 | 1,520,681 | 6,062,513 | 2,500,000 | 2,500,000 | 12,942,890 | 2,500,000 | 11,963,571 | 11,938,116 |
| 2042 | 11,938,116 | 1,357,961 | 5,393,165 | 5,393,165 | 5,393,165 | 11,963,571 | 5,393,165 | 7,928,367 | 7,500,000 |



Limited Liability Company-NIMCRUT Illustration

Jack & Jill Flash

Part 3 of 3

| Year | NIMCRUT Payouts | | | | Undistributed Baskets | | |
|-------|---------------------------------------|---------------------|--------------------------|-------------------------|---------------------------------------|--------------------------|-------------------------|
| | Qualified Dividends + Ordinary Income | Qualified Dividends | Short-Term Capital Gains | Long-Term Capital Gains | Qualified Dividends + Ordinary Income | Short-Term Capital Gains | Long-Term Capital Gains |
| Start | | | | | 0 | 0 | 9,000,000 |
| 2023 | 0 | 0 | 0 | 0 | 200,000 | 150,000 | 9,150,000 |
| 2024 | 0 | 0 | 0 | 0 | 416,000 | 387,000 | 9,387,000 |
| 2025 | 0 | 0 | 0 | 0 | 649,280 | 680,460 | 9,680,460 |
| 2026 | 0 | 0 | 0 | 0 | 901,222 | 1,016,147 | 10,016,147 |
| 2027 | 0 | 0 | 0 | 0 | 1,173,320 | 1,388,064 | 10,388,064 |
| 2028 | 0 | 0 | 0 | 0 | 1,467,186 | 1,794,421 | 10,794,421 |
| 2029 | 0 | 0 | 0 | 0 | 1,784,561 | 2,235,631 | 11,235,631 |
| 2030 | 0 | 0 | 0 | 0 | 2,127,326 | 2,713,310 | 11,713,310 |
| 2031 | 0 | 0 | 0 | 0 | 2,497,512 | 3,229,789 | 12,229,789 |
| 2032 | 0 | 0 | 0 | 0 | 2,897,312 | 3,787,879 | 12,787,879 |
| 2033 | 2,500,000 | 2,500,000 | 0 | 0 | 829,097 | 4,390,762 | 13,390,762 |
| 2034 | 1,245,425 | 1,245,425 | 1,254,575 | 0 | 0 | 3,749,875 | 14,004,450 |
| 2035 | 399,634 | 399,634 | 2,100,366 | 0 | 0 | 2,256,079 | 14,611,020 |
| 2036 | 381,605 | 381,605 | 2,118,395 | 0 | 0 | 727,172 | 15,200,508 |
| 2037 | 362,133 | 362,133 | 1,293,516 | 844,351 | 0 | 0 | 14,922,501 |
| 2038 | 341,104 | 341,104 | 539,000 | 1,619,896 | 0 | 0 | 13,841,604 |
| 2039 | 318,392 | 318,392 | 508,294 | 1,673,314 | 0 | 0 | 12,676,584 |
| 2040 | 293,863 | 293,863 | 474,545 | 1,731,592 | 0 | 0 | 11,419,537 |
| 2041 | 267,373 | 267,373 | 437,802 | 1,794,826 | 0 | 0 | 10,062,513 |
| 2042 | 238,762 | 238,762 | 397,973 | 4,756,430 | 0 | 0 | 6,500,000 |



Limited Liability Company-NIMCRUT Income Beneficiary Illustration

Jack & Jill Flash

Part 1 of 2

| Year | Beginning Balance | Charitable Deduction Benefit | Current-Year Returns | | Realized Short-Term Capital Gains 12.5% | Realized Long-Term Capital Gains 12.5% | Unrealized Gains |
|------|-------------------|------------------------------|----------------------|-------------|---|--|------------------|
| | | | Taxable Income 2.0% | Growth 6.0% | | | |
| 2023 | 0 | 100,520 | 2,010 | 6,031 | 754 | 754 | 4,523 |
| 2024 | 107,484 | 100,520 | 4,160 | 12,480 | 2,125 | 2,125 | 12,753 |
| 2025 | 222,012 | 100,520 | 6,451 | 19,352 | 4,013 | 4,013 | 24,078 |
| 2026 | 343,743 | | 6,875 | 20,625 | 5,588 | 5,588 | 33,527 |
| 2027 | 365,310 | | 7,306 | 21,919 | 6,931 | 6,931 | 41,584 |
| 2028 | 387,504 | | 7,750 | 23,250 | 8,104 | 8,104 | 48,626 |
| 2029 | 410,494 | | 8,210 | 24,630 | 9,157 | 9,157 | 54,942 |
| 2030 | 434,431 | | 8,689 | 26,066 | 10,126 | 10,126 | 60,756 |
| 2031 | 459,445 | | 9,189 | 27,567 | 11,040 | 11,040 | 66,242 |
| 2032 | 485,656 | | 9,713 | 29,139 | 11,923 | 11,923 | 71,536 |
| 2033 | 513,178 | | 10,264 | 30,791 | 12,791 | 12,791 | 76,745 |
| 2034 | 2,372,119 | | 47,442 | 142,327 | 27,384 | 27,384 | 164,304 |
| 2035 | 4,113,232 | | 82,265 | 246,794 | 51,387 | 51,387 | 308,323 |
| 2036 | 5,800,956 | | 116,019 | 348,057 | 82,048 | 82,048 | 492,286 |
| 2037 | 7,588,675 | | 151,774 | 455,321 | 118,451 | 118,451 | 710,705 |
| 2038 | 9,644,859 | | 192,897 | 578,692 | 161,175 | 161,175 | 967,047 |
| 2039 | 11,971,128 | | 239,423 | 718,268 | 210,664 | 210,664 | 1,263,986 |
| 2040 | 14,440,821 | | 288,816 | 866,449 | 266,304 | 266,304 | 1,597,827 |
| 2041 | 17,060,738 | | 341,215 | 1,023,644 | 327,684 | 327,684 | 1,966,103 |
| 2042 | 19,838,478 | | 396,770 | 1,190,309 | 394,551 | 394,551 | 2,367,309 |



Limited Liability Company-NIMCRUT Income Beneficiary Illustration

Jack & Jill Flash

Part 2 of 2

| Year | NIMCRUT Payouts | | | | Taxes | | | Ending Balance |
|------|-----------------|---------------------|--------------------------|-------------------------|-------------------------|--------------------------------|-------------------------------|----------------|
| | Ordinary Income | Qualified Dividends | Short-Term Capital Gains | Long-Term Capital Gains | Income & Medicare Taxes | Short-Term Capital Gains Taxes | Long-Term Capital Gains Taxes | |
| 2023 | 0 | 0 | 0 | 0 | 134 | 303 | 641 | 107,484 |
| 2024 | 0 | 0 | 0 | 0 | 320 | 854 | 1,458 | 222,012 |
| 2025 | 0 | 0 | 0 | 0 | 550 | 1,613 | 2,428 | 343,743 |
| 2026 | 0 | 0 | 0 | 0 | 686 | 2,380 | 2,866 | 365,310 |
| 2027 | 0 | 0 | 0 | 0 | 804 | 2,952 | 3,274 | 387,504 |
| 2028 | 0 | 0 | 0 | 0 | 910 | 3,452 | 3,647 | 410,494 |
| 2029 | 0 | 0 | 0 | 0 | 1,008 | 3,901 | 3,994 | 434,431 |
| 2030 | 0 | 0 | 0 | 0 | 1,100 | 4,314 | 4,327 | 459,445 |
| 2031 | 0 | 0 | 0 | 0 | 1,188 | 4,703 | 4,653 | 485,656 |
| 2032 | 0 | 0 | 0 | 0 | 1,275 | 5,079 | 4,976 | 513,178 |
| 2033 | 0 | 2,500,000 | 0 | 0 | 96,362 | 5,449 | 580,303 | 2,372,119 |
| 2034 | 0 | 1,245,425 | 1,254,575 | 0 | 98,884 | 546,114 | 303,658 | 4,113,232 |
| 2035 | 0 | 399,634 | 2,100,366 | 0 | 102,031 | 916,647 | 122,656 | 5,800,956 |
| 2036 | 0 | 381,605 | 2,118,395 | 0 | 105,644 | 937,389 | 133,324 | 7,588,675 |
| 2037 | 0 | 362,133 | 1,293,516 | 844,351 | 109,770 | 601,498 | 339,643 | 9,644,859 |
| 2038 | 0 | 341,104 | 539,000 | 1,619,896 | 114,579 | 298,274 | 532,467 | 11,971,128 |
| 2039 | 0 | 318,392 | 508,294 | 1,673,314 | 120,109 | 306,276 | 561,612 | 14,440,821 |
| 2040 | 0 | 293,863 | 474,545 | 1,731,592 | 126,214 | 315,602 | 593,533 | 17,060,738 |
| 2041 | 0 | 267,373 | 437,802 | 1,794,826 | 132,870 | 326,097 | 628,152 | 19,838,478 |
| 2042 | 0 | 238,762 | 397,973 | 4,756,430 | 250,003 | 337,615 | 1,330,898 | 24,900,204 |



After-Tax Limited Liability Company-NIMCRUT Payout Illustration

Jack & Jill Flash

| Year | NIMCRUT Payouts | | | | Taxes | | | After-Tax NIMCRUT Payouts |
|------|-----------------|---------------------|--------------------------|-------------------------|-------------------------|--------------------------------|-------------------------------|---------------------------|
| | Ordinary Income | Qualified Dividends | Short-Term Capital Gains | Long-Term Capital Gains | Income & Medicare Taxes | Short-Term Capital Gains Taxes | Long-Term Capital Gains Taxes | |
| 2023 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2024 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2025 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2026 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2027 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2028 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2029 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2030 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2031 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2032 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2033 | 0 | 2,500,000 | 0 | 0 | 95,000 | 0 | 575,000 | 1,830,000 |
| 2034 | 0 | 1,245,425 | 1,254,575 | 0 | 95,000 | 534,449 | 286,448 | 1,584,103 |
| 2035 | 0 | 399,634 | 2,100,366 | 0 | 95,000 | 894,756 | 91,916 | 1,418,328 |
| 2036 | 0 | 381,605 | 2,118,395 | 0 | 95,000 | 902,436 | 87,769 | 1,414,795 |
| 2037 | 0 | 362,133 | 1,293,516 | 844,351 | 95,000 | 551,038 | 277,491 | 1,576,471 |
| 2038 | 0 | 341,104 | 539,000 | 1,619,896 | 95,000 | 229,614 | 451,030 | 1,724,356 |
| 2039 | 0 | 318,392 | 508,294 | 1,673,314 | 95,000 | 216,533 | 458,092 | 1,730,374 |
| 2040 | 0 | 293,863 | 474,545 | 1,731,592 | 95,000 | 202,156 | 465,855 | 1,736,989 |
| 2041 | 0 | 267,373 | 437,802 | 1,794,826 | 95,000 | 186,504 | 474,306 | 1,744,191 |
| 2042 | 0 | 238,762 | 397,973 | 4,756,430 | 204,940 | 169,536 | 1,148,894 | 3,869,794 |



Distributable Limited Liability Company Earnings

Jack & Jill Flash

| Year | Undistributed LLC Earnings + Unrealized Gains | Distributable Limited Liability Company Earnings | | | | | Minimum Charitable Remainder Interest | Remaining Distributable LLC Earnings |
|-------|---|--|---------------------|--------------------------|---|------------|---------------------------------------|--------------------------------------|
| | | Ordinary Income | Qualified Dividends | Short-Term Capital Gains | Post-Contribution Long-Term Capital Gains | Total | | |
| Start | 0 | | | | 6,500,000 | | 7,500,000 | 2,500,000 |
| 2023 | 3,300,000 | 0 | 200,000 | 150,000 | 9,450,000 | 9,800,000 | 7,500,000 | 3,300,000 |
| 2024 | 4,164,000 | 0 | 416,000 | 387,000 | 9,861,000 | 10,664,000 | 7,500,000 | 4,164,000 |
| 2025 | 5,097,120 | 0 | 649,280 | 680,460 | 10,267,380 | 11,597,120 | 7,500,000 | 5,097,120 |
| 2026 | 6,104,890 | 0 | 901,222 | 1,016,147 | 10,687,520 | 12,604,890 | 7,500,000 | 6,104,890 |
| 2027 | 7,193,281 | 0 | 1,173,320 | 1,388,064 | 11,131,897 | 13,693,281 | 7,500,000 | 7,193,281 |
| 2028 | 8,368,743 | 0 | 1,467,186 | 1,794,421 | 11,607,136 | 14,868,743 | 7,500,000 | 8,368,743 |
| 2029 | 9,638,243 | 0 | 1,784,561 | 2,235,631 | 12,118,051 | 16,138,243 | 7,500,000 | 9,638,243 |
| 2030 | 11,009,302 | 0 | 2,127,326 | 2,713,310 | 12,668,667 | 17,509,302 | 7,500,000 | 11,009,302 |
| 2031 | 12,490,046 | 0 | 2,497,512 | 3,229,789 | 13,262,746 | 18,990,046 | 7,500,000 | 12,490,046 |
| 2032 | 14,089,250 | 0 | 2,897,312 | 3,787,879 | 13,904,059 | 20,589,250 | 7,500,000 | 14,089,250 |
| 2033 | 13,316,390 | 0 | 829,097 | 4,390,762 | 14,596,530 | 19,816,390 | 7,500,000 | 13,316,390 |
| 2034 | 12,481,701 | 0 | 0 | 3,749,875 | 15,231,826 | 18,981,701 | 7,500,000 | 12,481,701 |
| 2035 | 11,580,237 | 0 | 0 | 2,256,079 | 15,824,158 | 18,080,237 | 7,500,000 | 11,580,237 |
| 2036 | 10,606,656 | 0 | 0 | 727,172 | 16,379,484 | 17,106,656 | 7,500,000 | 10,606,656 |
| 2037 | 9,555,189 | 0 | 0 | 0 | 16,055,189 | 16,055,189 | 7,500,000 | 9,555,189 |
| 2038 | 8,419,604 | 0 | 0 | 0 | 14,919,604 | 14,919,604 | 7,500,000 | 8,419,604 |
| 2039 | 7,193,172 | 0 | 0 | 0 | 13,693,172 | 13,693,172 | 7,500,000 | 7,193,172 |
| 2040 | 5,868,626 | 0 | 0 | 0 | 12,368,626 | 12,368,626 | 7,500,000 | 5,868,626 |
| 2041 | 4,438,116 | 0 | 0 | 0 | 10,938,116 | 10,938,116 | 7,500,000 | 4,438,116 |
| 2042 | 0 | 0 | 0 | 0 | 6,500,000 | 6,500,000 | 7,500,000 | 0 |



Limited Liability Company Distribution Alternatives

Jack & Jill Flash

| Year | Distribution Alternatives | | | | | | | Actual LLC Distributions |
|------|---------------------------|--------------------|-----------------------|----------------|-----------|--|--------------------------------|--------------------------|
| | All In Last Year | Fixed Amortization | Variable Amortization | Current Income | Spigot | Undistributed LLC Earnings Now Plus Deferral | Maximum Acceleration Each Year | |
| 2023 | 0 | 0 | 0 | 0 | 0 | 853,125 | 853,125 | 0 |
| 2024 | 0 | 0 | 0 | 0 | 0 | 0 | 2,081,625 | 0 |
| 2025 | 0 | 0 | 0 | 0 | 0 | 0 | 3,408,405 | 0 |
| 2026 | 0 | 0 | 0 | 0 | 0 | 0 | 4,841,327 | 0 |
| 2027 | 0 | 0 | 0 | 0 | 0 | 0 | 6,388,884 | 0 |
| 2028 | 0 | 0 | 0 | 0 | 0 | 0 | 7,556,028 | 0 |
| 2029 | 0 | 0 | 0 | 0 | 0 | 0 | 8,755,823 | 0 |
| 2030 | 0 | 0 | 0 | 0 | 0 | 0 | 10,053,945 | 0 |
| 2031 | 0 | 0 | 0 | 0 | 0 | 0 | 11,457,089 | 0 |
| 2032 | 0 | 0 | 0 | 0 | 0 | 0 | 12,973,070 | 0 |
| 2033 | 0 | 0 | 1,619,409 | 1,637,553 | 2,500,000 | 0 | 14,610,622 | 2,500,000 |
| 2034 | 0 | 0 | 1,614,987 | 1,643,703 | 2,500,000 | 0 | 13,754,326 | 2,500,000 |
| 2035 | 0 | 0 | 1,601,773 | 1,612,773 | 2,500,000 | 0 | 12,867,098 | 2,500,000 |
| 2036 | 0 | 0 | 1,579,065 | 1,560,581 | 2,500,000 | 0 | 11,927,680 | 2,500,000 |
| 2037 | 0 | 0 | 1,546,103 | 1,494,821 | 2,500,000 | 0 | 10,922,501 | 2,500,000 |
| 2038 | 0 | 0 | 1,502,066 | 1,419,103 | 2,500,000 | 0 | 9,841,604 | 2,500,000 |
| 2039 | 0 | 0 | 1,446,069 | 1,334,980 | 2,500,000 | 0 | 8,676,584 | 2,500,000 |
| 2040 | 0 | 0 | 1,377,154 | 1,242,953 | 2,500,000 | 0 | 7,419,537 | 2,500,000 |
| 2041 | 0 | 0 | 1,294,289 | 1,142,976 | 2,500,000 | 0 | 6,062,513 | 2,500,000 |
| 2042 | 5,393,165 | 0 | 1,196,357 | 1,830,653 | 2,500,000 | 5,393,165 | 5,393,165 | 2,500,000 |





LLC NIMCRUT

Supporting Schedules for
TAX RATES

AN ANALYSIS PREPARED EXCLUSIVELY FOR

Jack & Jill Flash

Transfer of \$10M LLC Interest to 20-Year Spigot NIMCRUT

Tax Rates - Baseline Scenario

Jack & Jill Flash

| Year | Jack | | | | | Heirs | | | | |
|------|----------------------------------|--------------------------------------|-----------------------------------|--------------------------------|-----------------|----------------------------------|--------------------------------------|-----------------------------------|---------------------------------|-----------------|
| | Federal Ordinary Income Tax Rate | Effective State Income Tax Rate 5.0% | Combined Ordinary Income Tax Rate | Combined LT Cap Gains Tax Rate | Estate Tax Rate | Federal Ordinary Income Tax Rate | Effective State Income Tax Rate 5.0% | Combined Ordinary Income Tax Rate | Combined Capital Gains Tax Rate | Estate Tax Rate |
| 2023 | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% |
| 2024 | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% |
| 2025 | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% |
| 2026 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2027 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2028 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2029 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2030 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2031 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2032 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2033 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2034 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2035 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2036 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2037 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2038 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2039 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2040 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2041 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2042 | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |



Tax Rates - NIMCRUT Scenario

Jack & Jill Flash

| Year | Jack | | | | | | Heirs | | | | |
|------|----------------------------------|--------------------------------------|-----------------------------------|--------------------------------|-------------------------------|-----------------|----------------------------------|--------------------------------------|-----------------------------------|---------------------------------|-----------------|
| | Federal Ordinary Income Tax Rate | Effective State Income Tax Rate 5.0% | Combined Ordinary Income Tax Rate | Combined LT Cap Gains Tax Rate | Charitable Deduction Tax Rate | Estate Tax Rate | Federal Ordinary Income Tax Rate | Effective State Income Tax Rate 5.0% | Combined Ordinary Income Tax Rate | Combined Capital Gains Tax Rate | Estate Tax Rate |
| 2023 | 37.0% | 3.2% | 40.2% | 23.2% | 40.2% | 40.0% | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% |
| 2024 | 37.0% | 3.2% | 40.2% | 23.2% | 40.2% | 40.0% | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% |
| 2025 | 37.0% | 3.2% | 40.2% | 23.2% | 40.2% | 40.0% | 37.0% | 3.2% | 40.2% | 23.2% | 40.0% |
| 2026 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2027 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2028 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2029 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2030 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2031 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2032 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2033 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2034 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2035 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2036 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2037 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2038 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2039 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2040 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2041 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |
| 2042 | 39.6% | 3.0% | 42.6% | 23.0% | | 40.0% | 39.6% | 3.0% | 42.6% | 23.0% | 40.0% |

