



## ***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 NIMCRUT***

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## 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.



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## 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.

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Customer Signature

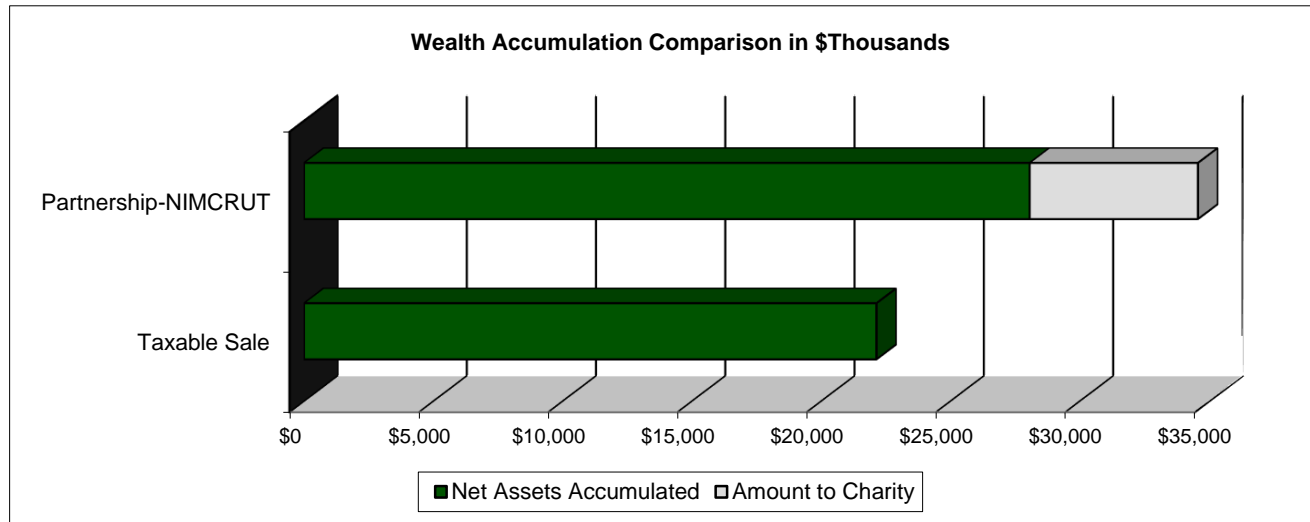


## Summary

Jack & Jill Flash

Projected Results in 2037	Taxable Sale	Inter Vivos NIMCRUT	NIMCRUT Adv/ -Disadv	PV of Adv/ -Disadv
Charitable deduction	NA	650,130	261,352	261,352
Cap gains and Medicare taxes on initial sale	2,565,000	0	2,565,000	2,565,000
Pretax value accumulated	23,051,662	28,102,156	5,050,493	2,796,562
Deferred capital gains and Medicare taxes	-908,104	-31,921	876,183	485,161
<b>Net assets accumulated</b>	<b>22,143,558</b>	<b>28,070,234</b>	<b>5,926,676</b>	<b>3,281,723</b>
Amount to charity	0	6,500,000	6,500,000	1,394,857
<b>Combined wealth accumulation</b>	<b>22,143,558</b>	<b>34,570,234</b>	<b>12,426,676</b>	<b>4,676,580</b>
Undistributed arrearage		10,561,098		

On the basis of current assumptions, utilizing a NIMCRUT in this manner will maximize the income beneficiary's after-tax wealth starting in 2031.

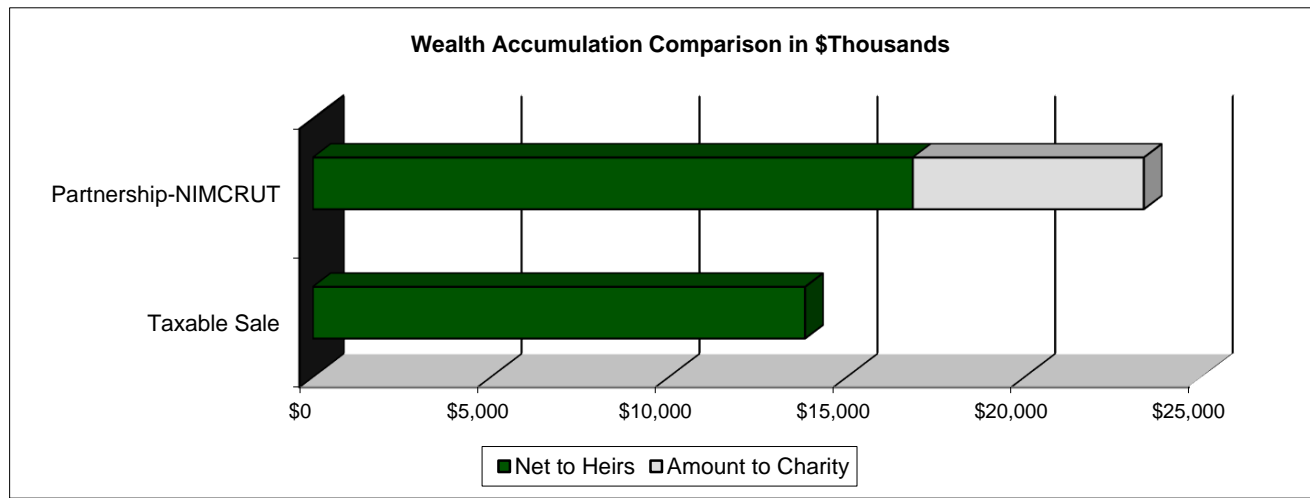


## Wealth Transfer Summary

Jack & Jill Flash

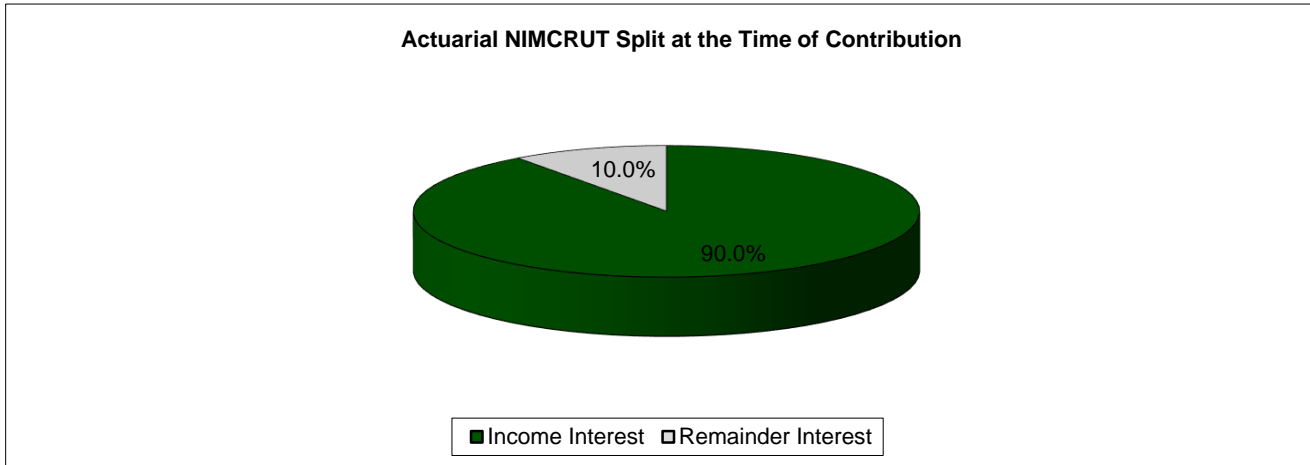
Projected Results in 2037	Taxable Sale	Inter Vivos NIMCRUT	NIMCRUT Adv/ -Disadv	PV of Adv/ -Disadv
Charitable deduction	NA	650,130	261,352	261,352
Cap gains and Medicare taxes on initial sale	2,565,000	0	2,565,000	2,565,000
Pretax value accumulated	23,051,662	28,102,156	5,050,493	2,796,562
Estate taxes	-9,220,665	-11,240,862	-2,020,197	-1,118,625
<b>Net to heirs</b>	<b>13,830,997</b>	<b>16,861,293</b>	<b>3,030,296</b>	<b>1,677,937</b>
Amount to charity	0	6,500,000	6,500,000	1,394,857
<b>Combined wealth transfer</b>	<b>13,830,997</b>	<b>23,361,293</b>	<b>9,530,296</b>	<b>3,072,794</b>
Undistributed arrearage		10,561,098		

On the basis of current assumptions, utilizing a NIMCRUT in this manner will maximize the family's after-tax wealth starting in 2032.



## Actuarial Summary

Jack & Jill Flash



Relevant Actuarial Calculations & Applicable Tests	
NIMCRUT payout rate	11.158%
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	6,500,000
Total percentage of remainder interest deductible	100.0%
Remainder factor	10.002%
<b>Charitable deduction</b>	<b>650,130</b>



## Assumptions

Jack & Jill Flash

### Planning Illustration

Transfer date	01-Jan-2018
Type of analysis	Inter vivos
Transferor	Jack
Tax laws to apply - income taxes	TCJA provisions sunset after 2025
Tax laws to apply - estate, gift & GST	TCJA provisions sunset after 2025
Type of trust	Term
Trust term	20 years
NIMCRUT payout rate method	Maximum
NIMCRUT payout rate	11.158%
NIMCRUT valuation date	Start of year
Months valuation date precedes payout	12
NIMCRUT payout frequency	Annual

### Limited Liability Company-NIMCRUT Arrearage

Limited liability company distributions	All in last year
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### 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	1

### Tax Rates

	Baseline	NIMCRUT
<b>Senior Generation</b>		
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
Baseline rate	2.0%	6.0%
Percentage subject to tax	100.0%	25.0%
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



## Assumptions

*Jack & Jill Flash*

<b>Medicare Surtax</b>	<b>Baseline</b>	<b>NIMCRUT</b>
% 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%

<b>Other</b>	
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
2018	7,950,060	90,335	7,859,724	279,457	3,175	276,282	3,126,250	-4,457,192	10,800,000	6,342,808
2019	8,471,106	164,345	8,306,762	297,773	5,777	291,996	3,733,638	-4,281,128	11,664,000	7,382,872
2020	9,003,922	226,182	8,777,739	316,502	7,951	308,552	4,382,444	-4,086,743	12,597,120	8,510,377
2021	9,553,321	279,034	9,274,287	335,815	9,809	326,006	5,077,776	-3,870,504	13,604,890	9,734,385
2022	10,123,408	325,349	9,798,059	355,854	11,437	344,418	5,824,701	-3,628,941	14,693,281	11,064,340
2023	10,717,764	367,011	10,350,753	376,747	12,901	363,846	6,628,354	-3,358,553	15,868,743	12,510,190
2024	11,339,599	405,479	10,934,120	398,605	14,253	384,352	7,494,030	-3,055,738	17,138,243	14,082,505
2025	11,991,867	441,885	11,549,982	421,534	15,533	406,001	8,427,258	-2,716,723	18,509,302	15,792,579
2026	12,671,355	473,581	12,197,774	445,419	16,647	428,771	9,397,551	-2,371,451	19,990,046	17,618,595
2027	13,385,890	508,002	12,877,888	470,536	17,857	452,679	10,474,506	-1,950,703	21,589,250	19,638,547
2028	14,138,083	542,436	13,595,648	496,976	19,067	477,909	11,636,790	-1,480,948	23,316,390	21,835,442
2029	14,930,534	577,332	14,353,202	524,832	20,294	504,538	12,891,436	-957,228	25,181,701	24,224,473
2030	15,765,869	613,061	15,152,808	554,196	21,550	532,646	14,245,988	-374,174	27,196,237	26,822,063
2031	16,646,769	649,932	15,996,837	585,161	22,846	562,315	15,708,555	274,033	29,371,936	29,645,969
2032	17,575,995	688,209	16,887,785	617,825	24,192	593,633	17,287,865	993,712	31,721,691	32,715,404
2033	18,556,408	728,123	17,828,284	652,288	25,595	626,693	18,993,323	1,791,732	34,259,426	36,051,159
2034	19,590,989	769,883	18,821,106	688,655	27,063	661,592	20,835,071	2,675,557	37,000,181	39,675,738
2035	20,682,854	813,679	19,869,175	727,036	28,602	698,434	22,824,049	3,653,307	39,960,195	43,613,502
2036	21,835,269	859,695	20,975,574	767,545	30,220	737,325	24,972,061	4,733,812	43,157,011	47,890,823
2037	23,051,662	908,104	22,143,558	28,102,156	31,921	28,070,234	0	5,926,676	6,500,000	12,426,676



## Annual Net to Heirs Comparison

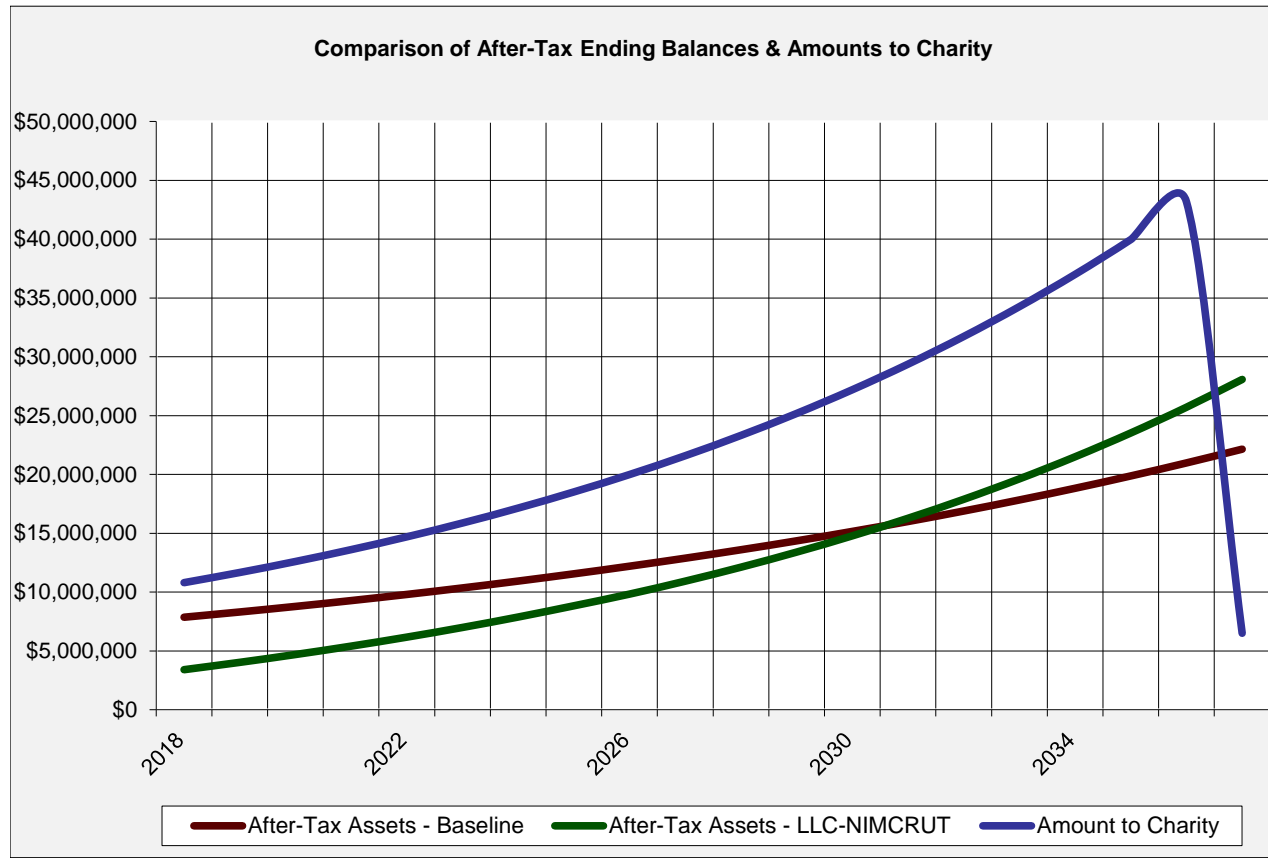
Jack & Jill Flash

Year	Taxable Sale Scenario			Limited Liability Company-NIMCRUT Scenario						LLC-NIMCRUT Adv-/Disadv	
	Ending Balance	Estate Tax	Net to Heirs	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
2018	7,950,060	3,180,024	4,770,036	279,457	3,126,250	3,405,707	1,362,283	2,043,424	10,800,000	-2,726,611	8,073,389
2019	8,471,106	3,388,443	5,082,664	297,773	3,733,638	4,031,411	1,612,564	2,418,846	11,664,000	-2,663,818	9,000,182
2020	9,003,922	3,601,569	5,402,353	316,502	4,382,444	4,698,947	1,879,579	2,819,368	12,597,120	-2,582,985	10,014,135
2021	9,553,321	3,821,329	5,731,993	335,815	5,077,776	5,413,591	2,165,436	3,248,155	13,604,890	-2,483,838	11,121,051
2022	10,123,408	4,049,363	6,074,045	355,854	5,824,701	6,180,555	2,472,222	3,708,333	14,693,281	-2,365,712	12,327,569
2023	10,717,764	4,287,106	6,430,658	376,747	6,628,354	7,005,101	2,802,040	4,203,060	15,868,743	-2,227,598	13,641,145
2024	11,339,599	4,535,840	6,803,759	398,605	7,494,030	7,892,635	3,157,054	4,735,581	17,138,243	-2,068,178	15,070,064
2025	11,991,867	4,796,747	7,195,120	421,534	8,427,258	8,848,792	3,539,517	5,309,275	18,509,302	-1,885,845	16,623,457
2026	12,671,355	5,068,542	7,602,813	445,419	9,397,551	9,842,970	3,937,188	5,905,782	19,990,046	-1,697,031	18,293,015
2027	13,385,890	5,354,356	8,031,534	470,536	10,474,506	10,945,042	4,378,017	6,567,025	21,589,250	-1,464,509	20,124,741
2028	14,138,083	5,655,233	8,482,850	496,976	11,636,790	12,133,767	4,853,507	7,280,260	23,316,390	-1,202,590	22,113,800
2029	14,930,534	5,972,214	8,958,321	524,832	12,891,436	13,416,269	5,366,507	8,049,761	25,181,701	-908,559	24,273,142
2030	15,765,869	6,306,348	9,459,522	554,196	14,245,988	14,800,184	5,920,074	8,880,110	27,196,237	-579,411	26,616,826
2031	16,646,769	6,658,708	9,988,061	585,161	15,708,555	16,293,716	6,517,486	9,776,229	29,371,936	-211,832	29,160,104
2032	17,575,995	7,030,398	10,545,597	617,825	17,287,865	17,905,690	7,162,276	10,743,414	31,721,691	197,817	31,919,508
2033	18,556,408	7,422,563	11,133,845	652,288	18,993,323	19,645,611	7,858,244	11,787,367	34,259,426	653,522	34,912,948
2034	19,590,989	7,836,396	11,754,593	688,655	20,835,071	21,523,726	8,609,490	12,914,236	37,000,181	1,159,642	38,159,823
2035	20,682,854	8,273,142	12,409,712	727,036	22,824,049	23,551,084	9,420,434	14,130,651	39,960,195	1,720,938	41,681,133
2036	21,835,269	8,734,107	13,101,161	767,545	24,972,061	25,739,606	10,295,842	15,443,764	43,157,011	2,342,602	45,499,613
2037	23,051,662	9,220,665	13,830,997	28,102,156	0	28,102,156	11,240,862	16,861,293	6,500,000	3,030,296	9,530,296



## Annual After-Tax Assets Illustration

Jack & Jill Flash

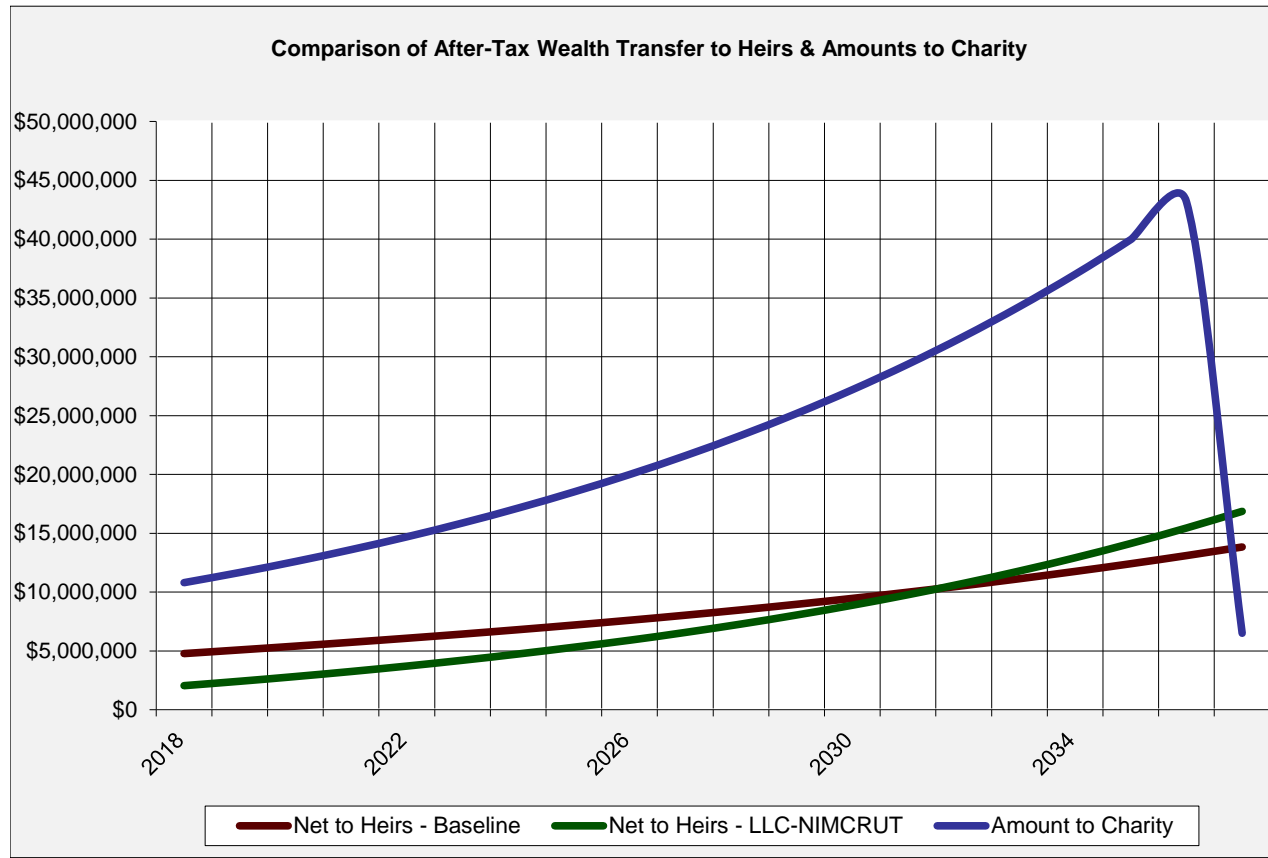


The illustration above compares the after-tax assets available to the income beneficiaries of the NIMCRUT with the assets accumulated by the family in the baseline scenario. The annual year-end values of the NIMCRUT are also shown.



## Annual Net to Heirs Illustration

Jack & Jill Flash



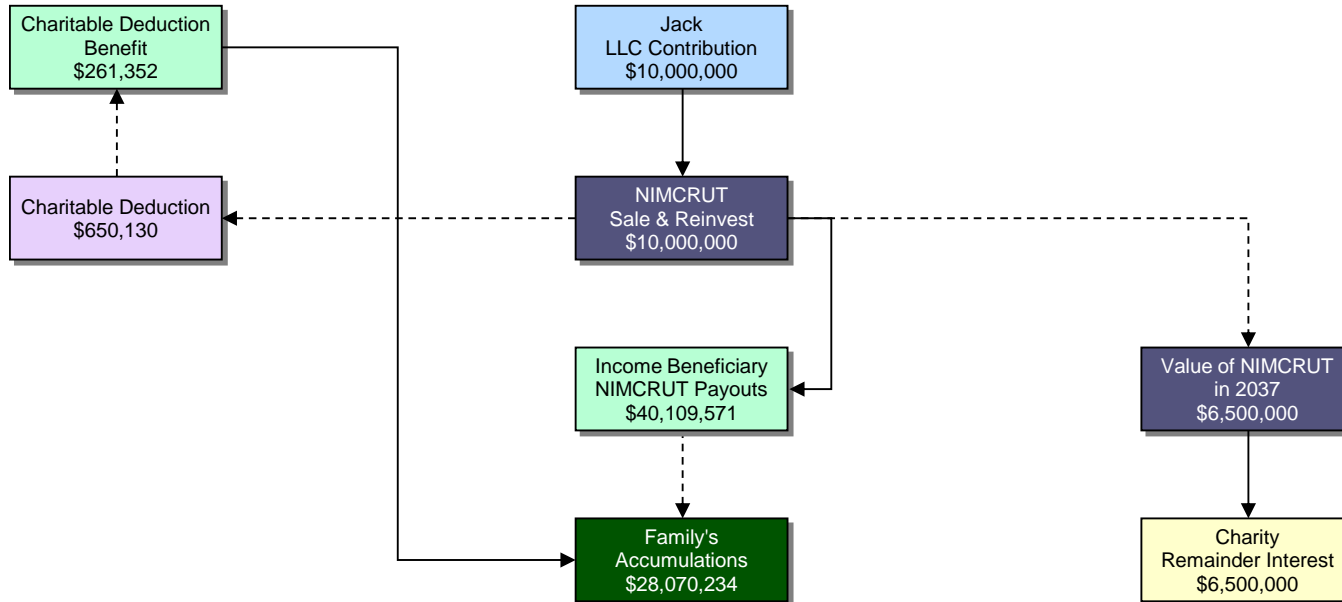
The illustration above compares the after-tax wealth transferred to heirs with a NIMCRUT to the net transfer to heirs in the baseline scenario. The annual year-end values of the NIMCRUT are also shown.



## Wealth Accumulation with a Limited Liability Company-NIMCRUT

Jack & Jill Flash

### Limited Liability Company-NIMCRUT Illustration



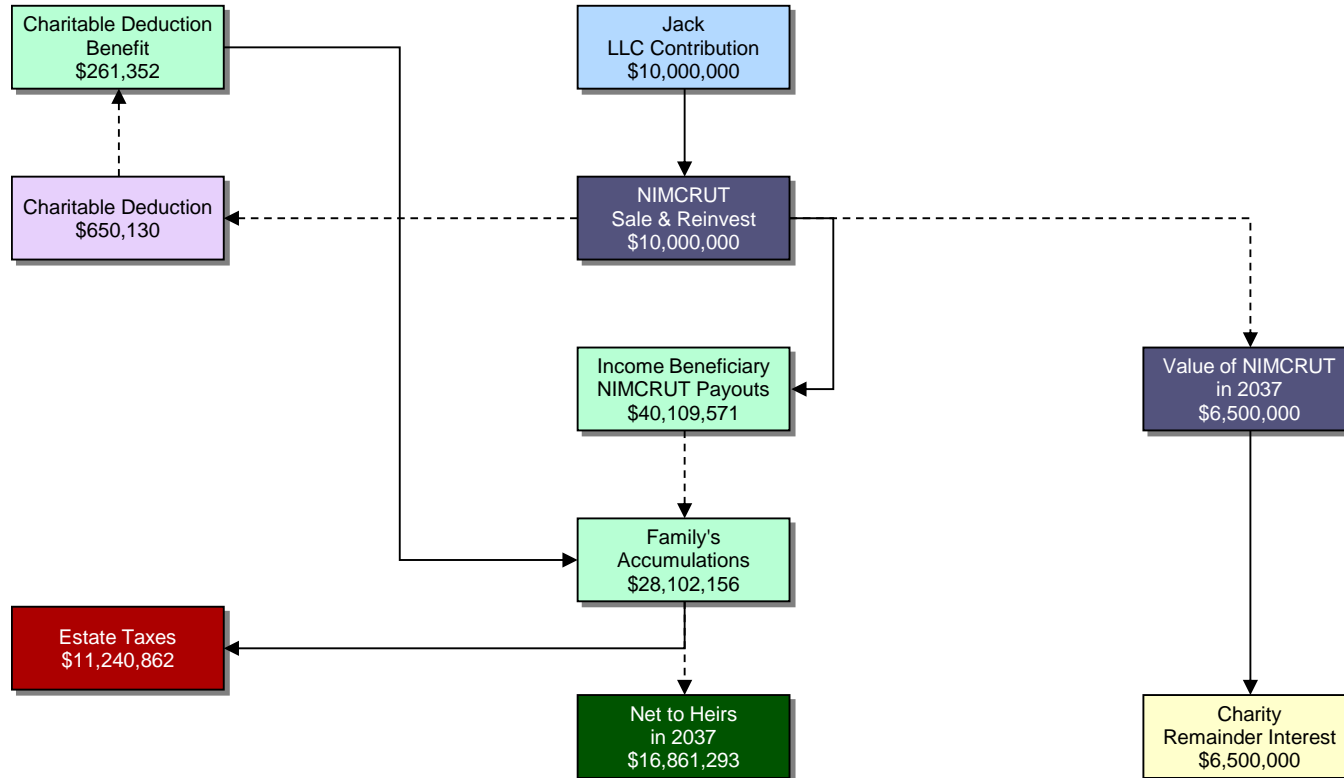
On the basis of current assumptions, utilizing a NIMCRUT in the illustrated manner is projected to produce a net after-tax advantage of \$5,926,676 in 2037, or \$3,281,723 in today's dollars, not including the amount that ultimately passes to charity.



## 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 \$3,030,296 in 2037, or \$1,677,937 in today's dollars, not including the amount that ultimately passes to charity.





## ***LLC NIMCRUT***

Sensitivity Analyses

AN ANALYSIS PREPARED EXCLUSIVELY FOR

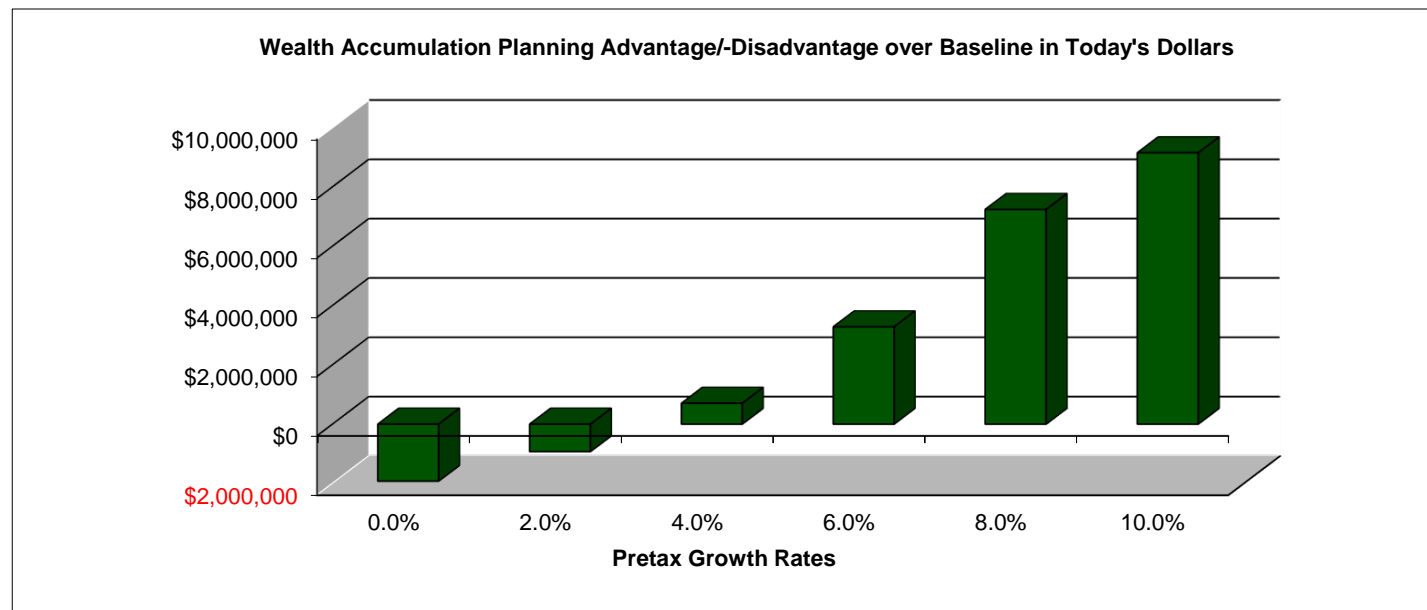
**Jack & Jill Flash**

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

## Wealth Accumulation Sensitivity Analysis - Growth Rates

Jack & Jill Flash

2037 Growth	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%	9,939,936	8,359,474	6,468,540	6,500,000	-3,471,396	-1,922,184
2.0%	12,937,476	15,411,231	11,263,051	6,500,000	-1,674,425	-927,164
4.0%	16,901,174	25,571,355	18,174,200	6,500,000	1,273,026	704,901
6.0%	22,143,558	40,109,571	28,070,234	6,500,000	5,926,676	3,281,723
8.0%	29,075,661	60,774,999	42,148,683	6,500,000	13,073,022	7,238,801
10.0%	38,236,711	80,005,585	54,762,624	16,457,346	16,525,913	9,150,738



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.



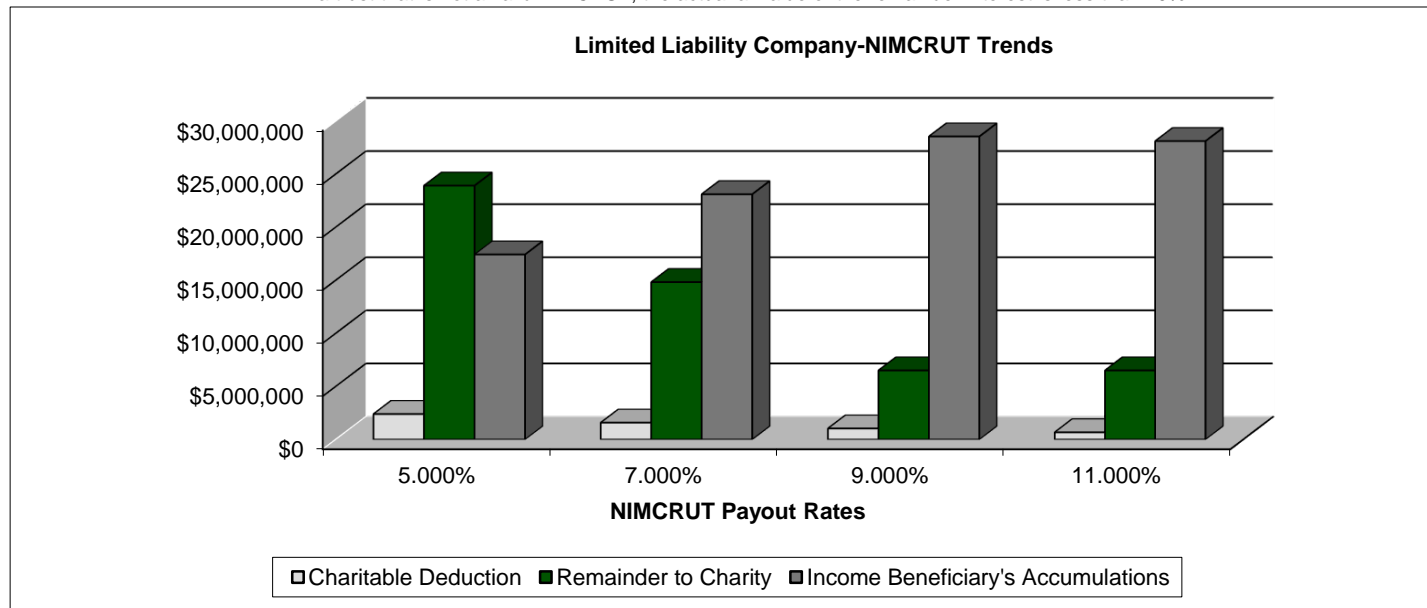


## Wealth Accumulation Sensitivity Analysis - Payout Rates

Jack & Jill Flash

2037 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%	2,393,723	23,903,589	22,705,982	17,418,360	-4,725,198	-2,616,439
7.000%	1,581,704	14,821,196	31,788,375	23,094,464	950,907	526,536
9.000%	1,036,393	6,500,000	40,109,571	28,532,695	6,389,137	3,537,797
11.000%	672,971	6,500,000	40,109,571	28,097,581	5,954,023	3,296,865
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.





## ***LLC NIMCRUT***

Supporting Schedules for  
**BASELINE SCENARIO**

**AN ANALYSIS PREPARED EXCLUSIVELY FOR**

**Jack & Jill Flash**

***Transfer of \$10M LLC Interest to 20-Year 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	9,500,000	0	361,000	0	2,204,000	7,435,000
2018	7,435,000	148,700	446,100	55,763	55,763	334,575	9,889	22,417	47,435	7,950,060
2019	7,950,060	159,001	477,004	101,447	101,447	608,684	13,752	40,782	60,424	8,471,106
2020	8,471,106	169,422	508,266	139,619	139,619	837,713	17,049	56,127	71,697	9,003,922
2021	9,003,922	180,078	540,235	172,244	172,244	1,033,461	19,933	69,242	81,739	9,553,321
2022	9,553,321	191,066	573,199	200,833	200,833	1,204,995	22,524	80,735	90,921	10,123,408
2023	10,123,408	202,468	607,404	226,550	226,550	1,359,300	24,912	91,073	99,532	10,717,764
2024	10,717,764	214,355	643,066	250,296	250,296	1,501,774	27,168	100,619	107,799	11,339,599
2025	11,339,599	226,792	680,376	272,769	272,769	1,636,613	29,349	109,653	115,898	11,991,867
2026	11,991,867	239,837	719,512	294,516	294,516	1,767,093	31,497	125,464	122,901	12,671,355
2027	12,671,355	253,427	760,281	315,922	315,922	1,895,531	33,640	134,583	130,950	13,385,890
2028	13,385,890	267,718	803,153	337,336	337,336	2,024,013	35,811	143,705	139,162	14,138,083
2029	14,138,083	282,762	848,285	359,037	359,037	2,154,224	38,032	152,950	147,614	14,930,534
2030	14,930,534	298,611	895,832	381,257	381,257	2,287,542	40,323	162,415	156,370	15,765,869
2031	15,765,869	315,317	945,952	404,187	404,187	2,425,121	42,700	172,184	165,486	16,646,769
2032	16,646,769	332,935	998,806	427,991	427,991	2,567,945	45,179	182,324	175,013	17,575,995
2033	17,575,995	351,520	1,054,560	452,813	452,813	2,716,879	47,772	192,898	184,997	18,556,408
2034	18,556,408	371,128	1,113,384	478,783	478,783	2,872,697	50,490	203,962	195,480	19,590,989
2035	19,590,989	391,820	1,175,459	506,020	506,020	3,036,117	53,347	215,564	206,503	20,682,854
2036	20,682,854	413,657	1,240,971	534,636	534,636	3,207,817	56,351	227,755	218,107	21,835,269
2037	21,835,269	436,705	1,310,116	564,742	564,742	3,388,449	59,515	240,580	230,333	23,051,662





## ***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 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)		
2018	279,457	11,761	3,175	276,282	3,126,250	516,697	516,697	792,979	10,074,730
2019	297,773	21,396	5,777	291,996	3,733,638	1,373,061	1,373,061	1,665,057	9,733,666
2020	316,502	29,447	7,951	308,552	4,382,444	2,290,763	2,290,763	2,599,315	9,365,317
2021	335,815	36,328	9,809	326,006	5,077,776	3,276,501	3,276,501	3,602,508	8,967,500
2022	355,854	42,358	11,437	344,418	5,824,701	4,337,065	4,337,065	4,681,483	8,537,857
2023	376,747	47,782	12,901	363,846	6,628,354	5,479,448	5,479,448	5,843,294	8,073,844
2024	398,605	52,790	14,253	384,352	7,494,030	6,710,953	6,710,953	7,095,305	7,572,709
2025	421,534	57,530	15,533	406,001	8,427,258	8,039,276	8,039,276	8,445,276	7,031,483
2026	445,419	62,116	16,647	428,771	9,397,551	9,397,551	9,397,551	9,826,323	6,500,000
2027	470,536	66,631	17,857	452,679	10,474,506	10,474,506	10,474,506	10,927,185	6,500,000
2028	496,976	71,147	19,067	477,909	11,636,790	11,636,790	11,636,790	12,114,699	6,500,000
2029	524,832	75,724	20,294	504,538	12,891,436	12,891,436	12,891,436	13,395,974	6,500,000
2030	554,196	80,411	21,550	532,646	14,245,988	14,245,988	14,245,988	14,778,634	6,500,000
2031	585,161	85,247	22,846	562,315	15,708,555	15,708,555	15,708,555	16,270,869	6,500,000
2032	617,825	90,267	24,192	593,633	17,287,865	17,287,865	17,287,865	17,881,498	6,500,000
2033	652,288	95,503	25,595	626,693	18,993,323	18,993,323	18,993,323	19,620,016	6,500,000
2034	688,655	100,980	27,063	661,592	20,835,071	20,835,071	20,835,071	21,496,664	6,500,000
2035	727,036	106,724	28,602	698,434	22,824,049	22,824,049	22,824,049	23,522,482	6,500,000
2036	767,545	112,760	30,220	737,325	24,972,061	24,972,061	24,972,061	25,709,386	6,500,000
2037	28,102,156	119,109	31,921	28,070,234	0	0	0	28,070,234	6,500,000



**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				9,500,000	0
2018	10,000,000	200,000	600,000	75,000	3,575,000	450,000
2019	10,800,000	216,000	648,000	137,250	137,250	823,500
2020	11,664,000	233,280	699,840	190,418	190,418	1,142,505
2021	12,597,120	251,942	755,827	237,292	237,292	1,423,749
2022	13,604,890	272,098	816,293	280,005	280,005	1,680,032
2023	14,693,281	293,866	881,597	320,204	320,204	1,921,222
2024	15,868,743	317,375	952,125	359,168	359,168	2,155,010
2025	17,138,243	342,765	1,028,295	397,913	397,913	2,387,478
2026	18,509,302	370,186	1,110,558	437,255	437,255	2,623,527
2027	19,990,046	399,801	1,199,403	477,866	477,866	2,867,197
2028	21,589,250	431,785	1,295,355	520,319	520,319	3,121,914
2029	23,316,390	466,328	1,398,983	565,112	565,112	3,390,673
2030	25,181,701	503,634	1,510,902	612,697	612,697	3,676,182
2031	27,196,237	543,925	1,631,774	663,494	663,494	3,980,967
2032	29,371,936	587,439	1,762,316	717,910	717,910	4,307,462
2033	31,721,691	634,434	1,903,301	776,345	776,345	4,658,073
2034	34,259,426	685,189	2,055,566	839,205	839,205	5,035,229
2035	37,000,181	740,004	2,220,011	906,905	906,905	5,441,430
2036	39,960,195	799,204	2,397,612	979,880	979,880	5,879,281
2037	43,157,011	863,140	2,589,421	1,058,588	7,410,114	0



**Limited Liability Company-NIMCRUT Illustration**

Jack & Jill Flash

Part 2 of 3

Year	Valuation for Payout	End of Year Scheduled Payout 11.158%	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	0	10,000,000
2018	6,500,000	725,270	3,850,000	0	0	0	725,270	0	10,800,000
2019	10,800,000	1,205,064	4,340,500	0	0	725,270	0	1,930,334	11,664,000
2020	11,664,000	1,301,469	4,954,615	0	0	1,930,334	0	3,231,803	12,597,120
2021	12,597,120	1,405,587	5,681,140	0	0	3,231,803	0	4,637,390	13,604,890
2022	13,604,890	1,518,034	6,513,249	0	0	4,637,390	0	6,155,423	14,693,281
2023	14,693,281	1,639,476	7,447,522	0	0	6,155,423	0	7,794,900	15,868,743
2024	15,868,743	1,770,634	8,483,233	0	0	7,794,900	0	9,565,534	17,138,243
2025	17,138,243	1,912,285	9,621,824	0	0	9,565,534	0	11,477,819	18,509,302
2026	18,509,302	2,065,268	10,866,519	0	0	11,477,819	0	13,543,087	19,990,046
2027	19,990,046	2,230,489	12,222,052	0	0	13,543,087	0	15,773,576	21,589,250
2028	21,589,250	2,408,929	13,694,476	0	0	15,773,576	0	18,182,505	23,316,390
2029	23,316,390	2,601,643	15,291,028	0	0	18,182,505	0	20,784,148	25,181,701
2030	25,181,701	2,809,774	17,020,056	0	0	20,784,148	0	23,593,922	27,196,237
2031	27,196,237	3,034,556	18,890,969	0	0	23,593,922	0	26,628,478	29,371,936
2032	29,371,936	3,277,321	20,914,229	0	0	26,628,478	0	29,905,799	31,721,691
2033	31,721,691	3,539,506	23,101,354	0	0	29,905,799	0	33,445,305	34,259,426
2034	34,259,426	3,822,667	25,464,952	0	0	33,445,305	0	37,267,972	37,000,181
2035	37,000,181	4,128,480	28,018,765	0	0	37,267,972	0	41,396,452	39,960,195
2036	39,960,195	4,458,759	30,777,730	0	0	41,396,452	0	45,855,211	43,157,011
2037	43,157,011	4,815,459	40,109,571	40,109,571	40,109,571	45,855,211	40,109,571	10,561,098	6,500,000



**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	9,500,000
2018	0	0	0	0	200,000	75,000	9,575,000
2019	0	0	0	0	416,000	212,250	9,712,250
2020	0	0	0	0	649,280	402,668	9,902,668
2021	0	0	0	0	901,222	639,959	10,139,959
2022	0	0	0	0	1,173,320	919,964	10,419,964
2023	0	0	0	0	1,467,186	1,240,168	10,740,168
2024	0	0	0	0	1,784,561	1,599,336	11,099,336
2025	0	0	0	0	2,127,326	1,997,249	11,497,249
2026	0	0	0	0	2,497,512	2,434,504	11,934,504
2027	0	0	0	0	2,897,312	2,912,370	12,412,370
2028	0	0	0	0	3,329,097	3,432,689	12,932,689
2029	0	0	0	0	3,795,425	3,997,801	13,497,801
2030	0	0	0	0	4,299,059	4,610,498	14,110,498
2031	0	0	0	0	4,842,984	5,273,993	14,773,993
2032	0	0	0	0	5,430,423	5,991,903	15,491,903
2033	0	0	0	0	6,064,857	6,768,249	16,268,249
2034	0	0	0	0	6,750,045	7,607,453	17,107,453
2035	0	0	0	0	7,490,049	8,514,358	18,014,358
2036	0	0	0	0	8,289,253	9,494,238	18,994,238
2037	9,152,393	9,152,393	10,552,826	20,404,352	0	0	6,000,000





**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%			
2018	0	261,352	5,227	15,681	1,960	1,960	11,761
2019	279,457		5,589	16,767	3,566	3,566	21,396
2020	297,773		5,955	17,866	4,908	4,908	29,447
2021	316,502		6,330	18,990	6,055	6,055	36,328
2022	335,815		6,716	20,149	7,060	7,060	42,358
2023	355,854		7,117	21,351	7,964	7,964	47,782
2024	376,747		7,535	22,605	8,798	8,798	52,790
2025	398,605		7,972	23,916	9,588	9,588	57,530
2026	421,534		8,431	25,292	10,353	10,353	62,116
2027	445,419		8,908	26,725	11,105	11,105	66,631
2028	470,536		9,411	28,232	11,858	11,858	71,147
2029	496,976		9,940	29,819	12,621	12,621	75,724
2030	524,832		10,497	31,490	13,402	13,402	80,411
2031	554,196		11,084	33,252	14,208	14,208	85,247
2032	585,161		11,703	35,110	15,045	15,045	90,267
2033	617,825		12,356	37,069	15,917	15,917	95,503
2034	652,288		13,046	39,137	16,830	16,830	100,980
2035	688,655		13,773	41,319	17,787	17,787	106,724
2036	727,036		14,541	43,622	18,793	18,793	112,760
2037	767,545		15,351	46,053	19,852	19,852	119,109



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

**Limited Liability Company-NIMCRUT Income Beneficiary Illustration**

Jack & Jill Flash

Part 2 of 2

Year	NIMCRUT Payouts			Taxes			Ending Balance
	Qualified Dividends	Short-Term Capital Gains	Long-Term Capital Gains	Income & Medicare Taxes	Short-Term Capital Gains Taxes	Long-Term Capital Gains Taxes	
2018	0	0	0	348	788	1,667	279,457
2019	0	0	0	483	1,434	2,124	297,773
2020	0	0	0	599	1,973	2,520	316,502
2021	0	0	0	701	2,434	2,873	335,815
2022	0	0	0	792	2,838	3,196	355,854
2023	0	0	0	876	3,201	3,499	376,747
2024	0	0	0	955	3,537	3,789	398,605
2025	0	0	0	1,032	3,854	4,074	421,534
2026	0	0	0	1,107	4,410	4,320	445,419
2027	0	0	0	1,183	4,731	4,603	470,536
2028	0	0	0	1,259	5,051	4,892	496,976
2029	0	0	0	1,337	5,376	5,189	524,832
2030	0	0	0	1,417	5,709	5,497	554,196
2031	0	0	0	1,501	6,053	5,817	585,161
2032	0	0	0	1,588	6,409	6,152	617,825
2033	0	0	0	1,679	6,781	6,503	652,288
2034	0	0	0	1,775	7,170	6,871	688,655
2035	0	0	0	1,875	7,577	7,259	727,036
2036	0	0	0	1,981	8,006	7,667	767,545
2037	9,152,393	10,552,826	20,404,352	1,526,256	4,503,961	6,806,148	28,102,156



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

## 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
		Qualified Dividends	Short-Term Capital Gains	Post-Contribution Long-Term Capital Gains	Total		
Start	0			6,000,000		6,500,000	3,500,000
2018	4,300,000	200,000	75,000	10,025,000	10,300,000	6,500,000	4,300,000
2019	5,164,000	416,000	212,250	10,535,750	11,164,000	6,500,000	5,164,000
2020	6,097,120	649,280	402,668	11,045,173	12,097,120	6,500,000	6,097,120
2021	7,104,890	901,222	639,959	11,563,708	13,104,890	6,500,000	7,104,890
2022	8,193,281	1,173,320	919,964	12,099,996	14,193,281	6,500,000	8,193,281
2023	9,368,743	1,467,186	1,240,168	12,661,389	15,368,743	6,500,000	9,368,743
2024	10,638,243	1,784,561	1,599,336	13,254,346	16,638,243	6,500,000	10,638,243
2025	12,009,302	2,127,326	1,997,249	13,884,727	18,009,302	6,500,000	12,009,302
2026	13,490,046	2,497,512	2,434,504	14,558,031	19,490,046	6,500,000	13,490,046
2027	15,089,250	2,897,312	2,912,370	15,279,567	21,089,250	6,500,000	15,089,250
2028	16,816,390	3,329,097	3,432,689	16,054,603	22,816,390	6,500,000	16,816,390
2029	18,681,701	3,795,425	3,997,801	16,888,475	24,681,701	6,500,000	18,681,701
2030	20,696,237	4,299,059	4,610,498	17,786,680	26,696,237	6,500,000	20,696,237
2031	22,871,936	4,842,984	5,273,993	18,754,960	28,871,936	6,500,000	22,871,936
2032	25,221,691	5,430,423	5,991,903	19,799,365	31,221,691	6,500,000	25,221,691
2033	27,759,426	6,064,857	6,768,249	20,926,321	33,759,426	6,500,000	27,759,426
2034	30,500,181	6,750,045	7,607,453	22,142,682	36,500,181	6,500,000	30,500,181
2035	33,460,195	7,490,049	8,514,358	23,455,788	39,460,195	6,500,000	33,460,195
2036	36,657,011	8,289,253	9,494,238	24,873,520	42,657,011	6,500,000	36,657,011
2037	0	0	0	6,000,000	6,000,000	6,500,000	0





## ***LLC NIMCRUT***

Supporting Schedules for  
**TAX RATES**

AN ANALYSIS PREPARED EXCLUSIVELY FOR

**Jack & Jill Flash**

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

### Tax Rates

Jack & Jill Flash

Year	Baseline Scenario					LLC-NIMCRUT Scenario					
	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 LT Cap Gains Tax Rate	Charitable Deduction Tax Rate	Estate Tax Rate
2018	37.0%	3.2%	40.2%	23.2%	40.0%	37.0%	3.2%	40.2%	23.2%	40.2%	40.0%
2019	37.0%	3.2%	40.2%	23.2%	40.0%	37.0%	3.2%	40.2%	23.2%		40.0%
2020	37.0%	3.2%	40.2%	23.2%	40.0%	37.0%	3.2%	40.2%	23.2%		40.0%
2021	37.0%	3.2%	40.2%	23.2%	40.0%	37.0%	3.2%	40.2%	23.2%		40.0%
2022	37.0%	3.2%	40.2%	23.2%	40.0%	37.0%	3.2%	40.2%	23.2%		40.0%
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%

