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PGM Anywhere & Charitable Remainder Trusts

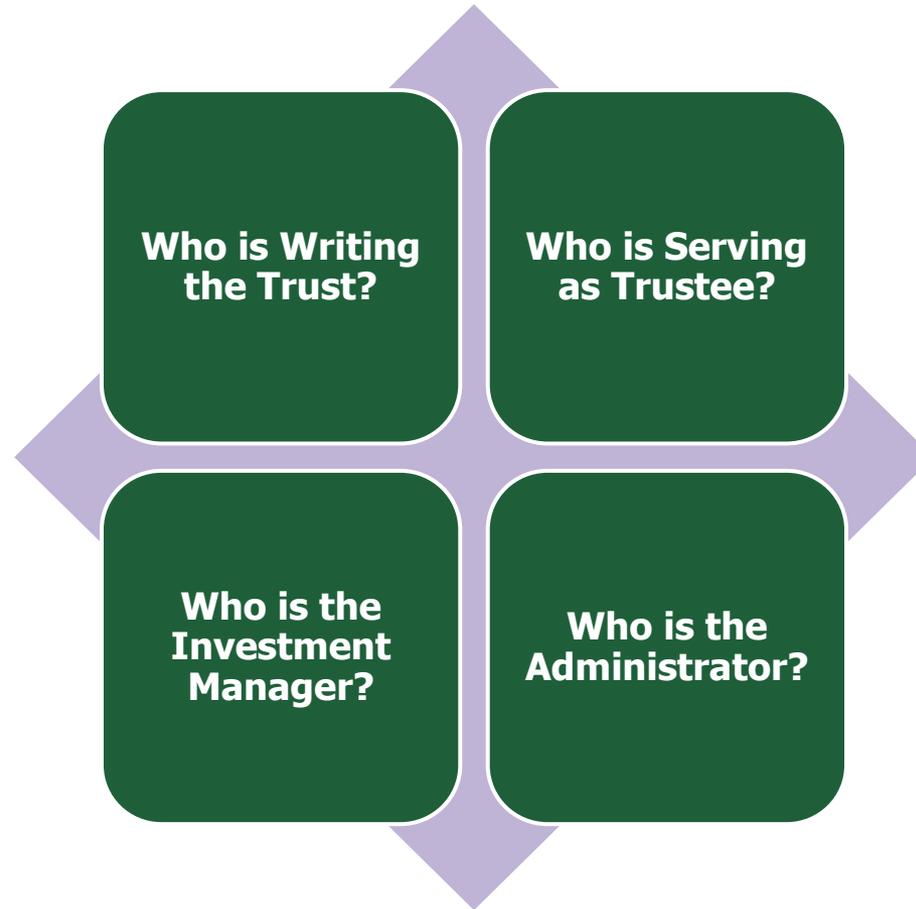
Case-Based Training

February 11-12, 2026

Jeffrey Frye, Associate Director for Gift Planning

Molly McGowan, Associate Director of Client Services

Four Essential Questions for Establishing a CRT



Case One: Key Learning Points

Funding with cash vs.
appreciated securities

Tax bracket
assumptions for donors
and beneficiaries

Investment
assumptions and
projected outcomes

Taxation of payments
with focus on CRUT
eight-tier system

Case One: CRUT vs. CGA

Robert and Alice Johnson, late 60s, retired and financially comfortable

Objective: Increase retirement income and benefit charity

Assets: \$500,000 appreciated securities (\$75,000 cost basis)

Comparison: CGA vs. CRUT funded with securities and cash

Case One: Discussion Prompts

What are the main differences between the CGA and the CRT?

Why would the Johnsons choose the CGA over the CRT?

Conversely, why would they choose the CRT over the CGA?

What are the additional costs and challenges for establishing a CRT instead of a CGA?

Case Two: Key Learning Points



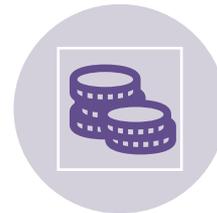
Review of tax and investment assumptions



Special rules and limitations for CRATs



5% probability test and Rev. Proc. 2016-42



Comparison of payment amounts and taxation

Case Two: CRUT vs. CGA vs. CRAT

Marie D'Aville, age
72, values
predictable income

Objective: Fixed
lifetime payments

Assets: \$400,000
appreciated
securities (\$100,000
cost basis)

Comparison across
three gift vehicles

Case Two: Discussion Prompt

What are the major differences between the 3 gift options presented to the donor? CGA, CRUT, and CRAT

Why would the CGA be preferable in some situations?

Which gift option makes the most sense for Ms. D'Aville?

What are the additional costs and requirements in choosing a CRT over a gift annuity?

Case Three: Key Learning Points

Overview of traditional IRAs and recent legislation

Unique tax considerations of QCD-funded CRTs

Quarterly payments from a CRUT

Limited but strategic donor appeal

Case Three: CRT Funded with Legacy IRA QCD

Ezra and Gladys
Edelman, early
70s

Concerned about
large IRA required
minimum
distributions

Use of Qualified
Charitable
Distribution (QCD)

\$55,000 or
\$111,000 one-
time funding

Case Three: Discussion Prompt

Is it permissible for the Edelmans to combine their \$55,000 QCDs in 2026 to establish a single Charitable Remainder Trust?

Would it make sense for each donor to establish their own CRT for \$55,000?

What is the group of donors for whom the QCD-funded CRTs make the most sense?

What are the additional costs and requirements for establishing a CRT that is funded with a QCD transfer from an IRA?

Case Four: Key Learning Points



Special aspects of Flip CRUTs



Comparison of pre-flip vs. post-flip payments



Changing investment assumptions over time



Impact of funding asset choice

Case Four: Flip CRUT – Retirement

Benjamin (59)
and Sarah Cohen
(58)

Objective:
Supplement
retirement
income

Assets: \$250,000
cash or \$500,000
appreciated
securities

Flip CRUT
triggered at
retirement

Case Four: Discussion Prompt

How do the calculations for a FLIP CRUT differ from the calculations for a standard CRUT?

How do the results for the securities-funded FLIP CRUT differ from the results of the cash-funded FLIP CRUT?

What are the options if the Cohens decide to retire sooner than planned, or later than planned?

How does the FLIP CRUT differ from a deferred gift annuity? And a flexible deferred gift annuity?

Case Five: Key Learning Points



Funding with illiquid assets such as real estate



Zero income prior to sale of property



Effect of sale costs and timing of flip



Comparison of pre-flip and post-flip income

Case Five: Flip CRUT with Illiquid Assets

NATHAN AND
DENISE RUSSELL,
AGES 73 AND 70

ASSET: SECOND
HOME WORTH
\$800,000 (\$200,000
COST BASIS)

CONCERN ABOUT
CAPITAL GAINS TAX
ON SALE

USE OF FLIP CRUT
FOR REAL ESTATE

Case Five: Discussion Prompt

How do the calculations for a FLIP CRUT differ from the calculations for a standard CRUT?

How do the results for the securities-funded FLIP CRUT differ from the results of the cash-funded FLIP CRUT?

What are the options if the Cohens decide to retire sooner than planned, or later than planned?

How does the FLIP CRUT differ from a deferred gift annuity? And a flexible deferred gift annuity?

Thank You



Thank you for attending this online training session



We hope this case-based overview was helpful and informative



PG Calc Client Services: 1-888-474-2252



Email: support@pgcalc.com