Administration and Investment Strategies for a Charitable Remainder Trust

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ADMINISTRATION AND INVESTMENT STRATEGIES FOR A CHARITABLE REMAINDER TRUST

Charitable remainder trusts are unique. Unlike the vast majority of other irrevocable trusts, every charitable remainder trust is a tax exempt entity that requires special – and somewhat unusual – accounting, investment, administrative and tax reporting procedures.

Although charitable remainder trusts can be quite flexible, there are restrictions and investment strategies that can be very different from other irrevocable trusts. In addition, there are special rules governing the taxation of distributions to beneficiaries and every trustee of a charitable remainder trust must file annual informational tax returns that reflect the uniqueness of this trust arrangement.

Clearly, a client serving as the trustee of a charitable remainder trust (typically the donor of the trust) should be reasonably familiar with the special restrictions and requirements of charitable remainder trusts. He or she should understand investment strategies, distribution requirements and the need for accurate and detailed accounting records. To facilitate the ability of the trustee to comply with all the complex administrative, investment and accounting requirements, the trust agreement can – and generally should – authorize the trustee to employ and compensate legal, accounting and investment professionals.

In this booklet we will look at: (a) the various forms of charitable remainder trusts from an administrative viewpoint; (b) the restrictions and requirements of which the trustee should be aware (c) the special accounting procedures; (d) investment strategies for different forms of charitable remainder trusts and (e) tax reporting requirements.

UNDERSTANDING THE GENERAL NATURE OF A CHARITABLE REMAINDER TRUST

Every charitable remainder trust will be in the form of either: (1) an annuity trust; (2) a unitrust; (3) an income only unitrust or (4) a flip unitrust. The specific administrative requirements, investment strategies and accounting methods will vary with the form of the trust.

Charitable Remainder Annuity Trusts

A charitable remainder annuity trust will direct the trustee to distribute a specific dollar amount to designated beneficiaries every year during the life of the trust. The distribution must be made from principal if income is not sufficient.

The annuity trust is clearly the most simple trust arrangement from an administrative and investment viewpoint. The trustee knows the exact amount that must be distributed to the beneficiaries annually, semiannually, quarterly or otherwise as the trust agreement may direct. Investments can be planned to provide adequate cash to make the required distributions. This can be especially important for year end distributions, which must be made before the end of the calendar year (the taxable year of the trust).

As noted above, it is not necessary to plan investments that will produce enough dividend and interest income to make the annuity distributions. Principal can be used where income is not sufficient. The trustee can raise the needed cash by selling investments or the trust can maintain a modest cash account to make the required distributions. Indeed,

property owned by the trust can be distributed in payment of the annuity amount.

To carry out the philanthropic objectives of the grantor and to assure the ability to make annuity payments, it is important that the trustee invest in a way that the principal will not be depleted by making the annuity payments. This is generally accomplished by investing for growth as well as for income.

All annuity payments will be taxed to the beneficiary under the so-called "four tier" system (explained on page 6). In many cases, investments will be planned so as to provide the best possible tax consequences to the beneficiary. The trustee must maintain accurate records that show the exact tax consequences of every annual annuity distribution and facilitate the filing of annual tax returns.

Charitable Remainder Unitrusts

The administration of a charitable remainder unitrust is generally more complex than the administration of an annuity trust.

Rather than provide for the annual payment of a specified dollar amount, a charitable remainder unitrust agreement requires the trustee to fix the value of the trust assets every year and to distribute a specified percentage of this value to the income beneficiary during the year – and before the end of the year.

Example: A unitrust funded with $120,000 can direct that the income beneficiary be paid 7% of the value of the trust each year for his or her lifetime. The amount distributed in the first year will be $8,400 (7% of $120,000). If the value of the trust increases to $130,000 in the second year (because income and growth was $18,400), the trustee will distribute $9,100 to the income beneficiary. And if the value of the trust increases to $150,000 in the third year, the distribution will be $10,500.

The trustee of a unitrust has the added responsibility of determining the fair market value of the trust assets every year and maintaining records to substantiate this valuation. In many cases, there will be more encouragement for the trustee to grow the value of a unitrust than there is to grow the value of an annuity trust.

As with an annuity trust, the trustee of a unitrust must also inform the beneficiary of the tax consequences of each distribution and must maintain records to justify these tax consequences and to file the required tax returns.

Charitable Remainder Unitrusts with Income Only Provisions

Income only unitrusts generally present additional administrative and investment complexities.

The income only unitrust agreement provides that the beneficiary is to be paid the lesser of the specified percentage of income or the income actually earned by the trust during the taxable year. With this limitation, the trustee will often feel the need to invest the trust assets in such a way as to earn dividend and interest income equal to the specified percentage of value – a strategy that could severely restrict the growth of the trust. And it is obviously necessary to maintain accounts showing the exact nature of the income realized by the trust.

In many cases, the income only unitrust agreement will also provide that, to the extent the full specified percentage of value is not paid because of the income limitation, the deficit can be paid in a later year from income that is in excess of the specified percentage of value. This form of trust is often used to defer distributions until after the beneficiary has retired and is in a lower tax bracket. Again, investment strategies will be limited and there will be additional accounting responsibilities for the trustee. The IRS has issued regulations regarding the definition of "trust income" for net income unitrusts. Net income unitrusts may not define trust income by reference to a fixed percentage of the annual fair market value of the trust property, even where state law would allow. Post-contribution capital gains may be allocated to income, under the terms of a net income unitrust, if not prohibited under local law. Trustees may be granted discretionary power to allocate post-contribution gain to income, but only if permitted under state law.

Distributions do not have to be made before the end of the calendar year but can be made within a reasonable time after the close of the year (generally before the time for filing a tax return for the trust).

Charitable Remainder Flip Unitrusts

The flip unitrust is a variation of the standard unitrust. It directs the payment of the lesser of the specified percentage of value or trust income until such time as certain trust properties are sold or the happening of some other "trigger event." The income limitation is automatically eliminated in the year after such a sale or other trigger event and the trust thereafter functions as a straight unitrust.

This form of trust can create significantly greater investment and accounting responsibilities for the trustee. Equally important, the trustee should have some familiarity with the complex rules for determining when the income only provision will be eliminated and the specified percentage of value will be payable from principal to the extent income is not sufficient.

RESTRICTIONS AND PROHIBITIONS IN ADMINISTRATION OF A CHARITABLE REMAINDER TRUST

In most cases, a charitable remainder trust can be invested and administered with the same flexibility as other irrevocable trusts. There are, however, some restrictions and prohibitions of which the trustee needs to be aware.

The trustee needs to know that additional contributions cannot be made to a charitable remainder annuity trust. If the grantor wants to place additional properties in a charitable remainder annuity trust, a new and separate trust entity must be created. Unitrusts, on the other hand, can accept additional contributions if the trust agreement so provides.

The other restrictions the trustee should be aware of are the prohibition against self dealing and the consequences of unrelated business taxable income (or debt related income) in the administration of the trust.

Prohibition against Self Dealing

Every charitable remainder trust must contain a specific prohibition against self dealing. Essentially, the trustee is prohibited from having any dealings that might possibly benefit a "disqualified person"– roughly defined as the grantor, the grantor's spouse, ancestors or lineal descendants or a corporation or trust controlled by the grantor or other disqualified person.

It is clear that, subject to minor exceptions, the trustee cannot sell, lease or exchange property with a disqualified person. Similarly, the trustee cannot make loans to disqualified persons or make any payments – other than reasonable compensation payments – to such persons. There are limited exceptions. One important exception permits a charitable remainder trust to transfer stock to a disqualified corporation for redemption.

There are other, less obvious, transactions that can also be prohibited forms of self dealing. For example, actions by the trust that manipulate the value of properties held by a disqualified person will be self dealing. Employing a charitable remainder trust to satisfy legal obligations of the grantor also will be self dealing. Examples: satisfying alimony obligations with trust payments or using the remainder interest to satisfy an outstanding irrevocable pledge.

The self dealing rules are very detailed and complex and it might be wise to caution the trustee to consult counsel before taking any steps other than prudently investing the trust assets and making the required annual distributions.

Unrelated Business Taxable Income

Before 2007, a charitable remainder trust that had *any* unrelated business taxable income (UBTI) – even one dollar – lost its exemption from income taxes. Loss of tax-exempt status affected the current year only, but if the trust sold business assets while nonexempt, heavy taxes could occur. Congress has changed the law to provide that, after 2006, UBTI will be subject to a 100% excise tax, but the trust keeps its tax-exempt status.

Donors now might consider transferring business interests to a unitrust with confidence that the trust can sell the assets without recognizing gain, even if it receives some business income prior to the sale. A farmer, for example, could transfer a working farm to a unitrust, or a business partner or LLC owner could place their interests in a CRT, and capital gains taxes would be avoided, so long as sale by the trustee to a particular buyer was not prearranged.

Rents, interest, dividends and capital gains are not considered business income, but income from the sale of debt-financed property will be taxed as UBTI. Essentially, this means that the trustee of a charitable remainder trust should be careful about borrowing money or mortgaging or pledging any trust properties. Later sale of these assets will cause some of the gain to be taxed – at a 100% rate.

A charitable remainder trust with small amounts of unrelated business income will be protected from having unrelated business *taxable* income because of an allowable $1,000 specific deduction. UBTI Code §512 defines UBTI as unrelated business income minus allowable deductions and a $1,000 exemption.

ACCOUNTING PROCEDURES FOR CHARITABLE REMAINDER TRUSTS

Basic accounting principles for a charitable remainder trust are quite similar to accounting principles for other irrevocable trusts. The accounting must show ordinary income (broken down into dividends, interest, business income, rents, etc.); ordinary and necessary expenses (for interest, taxes and other deductions); long and short term capital gains, and amounts distributed to beneficiaries for each taxable year. (All charitable remainder trusts must be on a calendar year basis.)

In other respects, the uniqueness of charitable remainder trusts requires special and additional accounting procedures.

Accounting for the "Four Tier" System of Taxing Distributions

Distributions to the individual beneficiaries of a charitable remainder trust are taxed under the following four tier system:

First, as ordinary income to the extent the trust had ordinary income in the taxable year or ordinary income in a prior year that had not been distributed to the beneficiaries.

Second, as capital gains to the extent the trust had capital gains in the taxable year or capital gains in a prior year that had not been distributed to the beneficiary. Short term gains are deemed to be distributed before long term gains and long term gains taxed at the highest maximum rate are deemed to be the first long term gains distributed.

Third, as "other income" (tax-exempt interest).

Fourth, as a tax free payment of principal.

Recent changes in the tax rates for capital gains and "qualified dividends" have further complicated the "four tier" system. Revised regulations, which took effect March 16, 2005, treat qualified dividends (taxed at a maximum 15% rate) as Tier 1 (ordinary income), but provide that they will be taken into account only after interest, rents, royalties and other ordinary income. Qualified dividends, however, are considered before Tier 2 payments (capital gain category), including gain that is taxed at rates higher than 15%, such as short term gain, 28% gain (collectibles) and 25% gain (unrecaptured §1250 gain).

The 15% capital gains rate is "grandfathered," with a few exceptions, for distributions of gains realized prior to May 6, 2003. Qualified dividend treatment (15% tax rate) will not apply to undistributed dividends received by a charitable remainder trust prior to January 1, 2003.

The regulations also speak to the changeable nature of tax rates for capital gains and dividends. The final regulations state that the rate to be used will be the tax rates applicable in the year in which the distribution is *required to be made*, not the tax rates applicable to the various classes of income in the year the income is received by the trust.

Because of this unique method of taxing distributions (and the special tax returns that must be filed), the accounts of a charitable remainder trust should show a running balance of all ordinary income, short term capital gains, long term capital gains and tax free income that has not been distributed to the beneficiaries.

Example: A charitable remainder annuity trust that is required to pay $8,000 a year to the individual beneficiary has the following income and gains – with no offsetting expenses:

Year One: $2,000 of interest income and $7,000 of 15% long term gain.

Year Two: $10,000 of interest income; $3,000 of short term gain and $2,000 of 15% long term gain.

Year Three: $4,000 of interest income and $12,000 of 15% long term gain.

The special accounting required to reflect this "four tier" system for taxing distributions would show:

ORDINARY INCOME

Year	Received	Distributed	Balance
1	$2,000	$2,000	0
2	$10,000	$8,000	$2,000
3	$4,000	$6,000	0

SHORT TERM CAPITAL GAINS

Year	Received	Distributed	Balance
1	0	0	0
2	$3,000	0	$3,000
3	0	$2,000	$1,000

LONG TERM CAPITAL GAINS

Year	Received	Distributed	Balance
1	$7,000	$6,000	$1,000
2	$2,000	0	$3,000
3	$12,000	0	$15,000

TAXATION OF DISTRIBUTIONS

Year	Ordinary Income	Short Term Gain	Long Term Gain
1	$2,000	0	$6,000
2	$8,000	0	0
3	$6,000	$2,000	0

We have used a simplified example that involves only ordinary interest, short term capital gains and long term capital gains subject to a maximum rate of 15%. Suppose during the three years that the trust had received some qualified dividends (taxed at a maximum rate of 15%) and capital gain from the sale of a painting (taxed at 28%). As ordinary income, the 15% dividends would still have been distributed before the short term gain (taxable as high as 35%), but after any ordinary interest (also taxed at the beneficiary's highest rates). And long term gain from sale of the painting would be considered distributed before any gain that is taxed at a maximum rate of 15%. Obviously, the revised tax rates and regulations have added another layer of complexity to trust accounting.

Cost Basis for Contributed Assets

A charitable remainder trust takes the grantor's cost basis for all assets transferred to the trust during the grantor's life. For example, a grantor transfers real property worth $110,000 to a charitable remainder unitrust. His adjusted cost basis is $40,000. A year later, the trust sells the property for $115,000. The trust has a capital gain of $65,000 (ignoring other possible adjustments).

Because the trust is tax exempt (assuming it does not have unrelated business income in the taxable year), it does not pay a tax on either its income or its capital gains.

Annual Valuation of Unitrust Assets

Every charitable remainder unitrust agreement requires the trustee to determine the fair market value of the assets of the trust annually – and on a specific day or days of the year. Clearly, the record keeping procedures of the trust must include maintaining an inventory of all the assets of the trust and the details of the fair market value of each of these assets. These records should be maintained for at least six years.

The trustee will have no problem determining the value of publicly traded stock. The fair market value is the mean between the high and low trading price on the valuation date. Mutual fund shares can also be easily valued at their bid price on the valuation date.

Other assets, however, can pose valuation problems – especially if the grantor also serves as trustee. In that case, a qualified appraisal of assets other than publicly traded stocks and bonds will be required each year. Alternatively, a special disinterested trustee may be appointed for the sole purpose of fixing the value of trust assets (and, perhaps, controlling the disposition of these assets).

Trust Accounting for Income Only Unitrusts

As previously noted, a charitable remainder unitrust agreement may limit annual distributions to the income actually earned by the trust during the year. In some cases, the term "trust income" can be ambiguous and it is often specifically defined in the trust agreement.

The IRS has accepted a grantor's right to define trust income in the trust instrument (assuming this is permitted by local law). But the IRS takes the position that, even where the trust agreement defines realized capital gains as "trust income," the amount of appreciation in the value of the property prior to the gift to the trust must be treated as principal, rather than as income.

Example: Property worth $120,000 is given to a charitable remainder unitrust. The grantor's cost basis is $62,000. Two years later, the property is sold for $135,000. The $73,000 gain can be treated as trust income only to the extent of $15,000 – the "post-contribution" gain – and only if the trust agreement permits this allocation.

Can the trustee be provided with flexibility in deciding whether to allocate post-contribution gains to income or principal? The regulations leave that up to state law: "A discretionary power to make this allocation may be granted to the trustee under the terms of the governing instrument but only to the extent that the state statute permits the trustee to make adjustments between income and principal to treat beneficiaries impartially."

If the income only unitrust has a "make-up provision," the accounting should clearly show the amount distributed each year that was less than the specified percentage of value and the cumulative deficit in distributing the specified percentage of value from the creation of the trust to date.

INVESTMENT STRATEGIES FOR CHARITABLE REMAINDER TRUSTS

Our tax laws clearly provide that the trustee of a charitable remainder trust must be free to invest the trust assets in a manner that could result in a reasonable amount of income or gain from the sale of trust assets.

The trust agreement, for example, cannot require the trustee to invest solely in municipal bonds. But the trust agreement can impose reasonable restrictions such as prohibiting investments in real property or closely held corporations.

In short, applicable tax laws give the trustee of a charitable remainder trust very broad investment discretion. The Uniform Prudent Investor Act, which has been adopted by many states, also allows significant flexibility in trust investments. Under this Act, the test of a prudent investment is applied to the total trust portfolio rather than to a single investment in the portfolio. There is no absolute

prohibition on any type of investment but there is a rather general requirement for diversification. Because the test for prudence is based on the trade off between risk and return, the Act tends to permit trustees to choose somewhat risky investments – provided the expected return balances the risk.

With such a huge range of investment options available, there obviously is no best way to invest the assets of every charitable remainder trust. However, some of the following observations may be helpful to trustees.

Charitable Remainder Annuity Trust Investment Strategies

The trustee of a charitable remainder annuity trust will generally have these three investment objectives: (1) providing the cash flow needed to make timely distributions; (2) providing favorable tax consequences for distributions to individual beneficiaries and (3) increasing the value of the trust assets so as to provide the greatest benefit to the war against cancer. The investments selected by the trustee cannot affect the amount of the annuity payments, which are fixed in the trust agreement.

Let's assume that a client creates a charitable remainder annuity trust with $200,000 of securities in which he has a cost basis of $120,000. The trust is to pay the client $12,000 a year for as long as he may live. The securities provide qualified dividend income of $3,000 a year. How could the trustee invest to achieve the above objectives?

The trustee could retain the securities and sell approximately $9,000 of the securities every year to raise the $12,000 required to make the annual distributions. This will provide a tax favored income for the client because $3,000 will be qualified dividend income, $3,600 will be capital gain and $5,400 will be tax free.

It would be reasonable to anticipate that the securities will increase in value by more than the 6% distributed to the client. So the American Institute for Cancer Research would reasonably receive more than $200,000 at the death of the client. The beneficiary cannot benefit from growth in the value of the trust because the annuity amount is fixed and unchangeable. But investing for growth will certainly be beneficial to our ongoing war against cancer.

Another strategy might be to sell the securities and invest the proceeds in a mixed portfolio of growth stock, dividend stocks and tax free municipal bonds.

Charitable Remainder Unitrust Investment Strategies

The trustee of a charitable remainder unitrust will generally have essentially the same investment objectives as the trustee of an annuity trust, but with this important difference: He or she will want to invest in a way that will increase the value of the trust assets – and therefore increase the unitrust amount distributed to the beneficiary.

In the above example of a gift of $200,000 to a charitable remainder trust, if the investment strategy provided a return of 8%, the value of the trust would increase to $244,000 in ten years and nearly $300,000 in 20 years. The unitrust amount payable to the client would increase from $12,000 to $14,640 in the tenth year and to $18,000 in the twentieth year. And, of course, there would be a major increase in the amount distributed to the American Institute for Cancer Research.

Again, income is not a major consideration because assets can be sold to raise the cash needed to make the required distributions. (Distributions could also be made in property, but the tax result would be the same as if the assets were sold and the cash proceeds were used to make the distribution.)

Income Only Unitrust Investment Strategies

Investment strategies for an income only unitrust are generally more complex, and more sophisticated, than the strategies for an annuity trust or standard unitrust.

Investment strategies will depend on whether the trust is funded with real property (or other assets that are not readily saleable) which does not produce adequate income to pay the specified percentage of value to the individual beneficiary, or whether the trust is funded with marketable securities but the grantor wants to defer the receipt of income until some later time, such as his or her retirement.

In both cases the trust agreement will generally provide that to the extent the full percentage of value is not paid because of the income limitation, it will be paid (or made-up) in a later year from income in excess of the specified percentage of value.

Trust Funded with Real Property. Where a trust is funded with a low income and hard-to-market property, there will be nothing other than the property to invest until the property is sold. The trustee will generally want to invest the sales proceeds in a way that will provide dividend, interest or other income equal to or greater than the specified percentage of value.

In the case of a standard unitrust, the grantor will transfer enough cash or liquid assets to the trust to permit the payment of the unitrust amount until the property is sold.

Assume, for example, that a client gives real property worth $200,000 to an income only unitrust (with make-up provisions) that is to pay her 6% of the value of the trust every year for as long as she lives. The trust sells the property for $200,000 two years after the trust was created. At this point there is a deficit of $24,000 that can be paid out of income in excess of 6% of value.

The trustee might decide to invest in high yield bonds that could provide an income of 7% or even a little higher. Or if the trust agreement provided that realized gains in excess of pre-gift appreciation would be treated as trust income, the trustee might want to invest in growth securities which could be sold to generate capital gains.

In many cases, the objectives of providing favorable tax consequences, increasing the unitrust amounts distributed each year and providing the largest possible gift to the war against cancer have to be secondary to the need for realizing current trust income or capital gain (if the agreement provides that this will be treated as income).

Deferring Distributions of Unitrust Amount. The typical investment strategy in a charitable remainder unitrust designed to permit the deferral of income is to: (a) invest in a way that produces growth of principal but little or no income until such time as the beneficiary retires (or otherwise wants distributions to begin) and (b) invest for a very high income in the years after retirement.

A "flip" unitrust, invested to produce long term capital gains (growth stock, for example) may be extremely tax efficient for the donor/beneficiary who wants to defer income.

Example: Dr. King, 45, transfers assets worth $100,000 to a net income unitrust that will pay him the lesser of the trust's net income or 6% annually. The trust contains a "flip" provision that will cause the trust to change to a standard unitrust in the year following his 69th birthday. In the year he sets up the trust, Dr. King can deduct a charitable contribution of $18,278 (6.0% AFR). The trustee invests entirely in growth stock that is expected to appreciate in value by 9% a year. Dr. King's trust will have grown to $862,300 by the time he retires at age 70 (returns based on historical standards). By then he will enjoy 6% annual payments of nearly $52,000 that will be part tax free, part capital gain, assuming the trustee sells just enough growth stock each year to make the 6% payout.

Note: If Dr. King wishes, he can add even more each year to his "retirement unitrust" – $25,000, for example – and receive additional deductions and even more income.

Other Investments

Tax-Exempt Securities. The question frequently arises as to whether it is permissible to fund or invest a charitable remainder trust with tax exempt securities. The answer is yes, with certain qualifications. The IRS has stated that to require the trustee to invest in tax-exempt bonds or to keep tax-exempt bonds originally transferred to the trust will disqualify the trust as an annuity trust or unitrust. Why? Because such a requirement impermissibly interferes with the trustee's investment powers. Investing in tax-exempts also may violate state "Prudent Investor" rules that require diversified portfolios and even-handed treatment of both income and remainder beneficiaries. Having said that, tax-exempt securities seemingly could be part

of the trust investments. It may make sense to ask the charitable remaindermen to grant written permission if the plan is to invest the trust largely in munis.

Foreign Securities. The IRS gave approval to the trustees of a unitrust to invest some of the trust assets in stocks and bonds of foreign corporations that are not controlled corporations. The IRS stated that the foreign source of income of the trust would be treated under tax rules set out in IRC §901, which provides, in general, for a pass-through of foreign taxes to the trust beneficiaries.

TAX REPORTING AND RECORD KEEPING BY A CHARITABLE REMAINDER TRUST

Even though a charitable remainder trust may not be subject to any tax for the taxable year, it must file certain forms with the IRS. The trust is required to file additional forms if it is subject to the income tax (i.e., because it has some unrelated business taxable income) or if it incurs a private foundation excise tax.

A charitable remainder trust is required to file the following forms with the IRS:

• Form 1041-A – but only if the trust is not required to distribute all of its current net income for the taxable year (e.g., where current net income is $6,000 and the annuity amount is $5,000).

• Form 4720 – but only if the trust is liable for a private foundation excise tax.

• Form 5227 – in all cases.

Form 1041-A is an information return concerned with accumulation of charitable amounts. Schedule PF (1041) is used by all "section 4947(a) trusts" (which include charitable remainder trusts) to determine liability for "Chapter 42 tax" (private foundation excise taxes). Form 5227 is generally required to be filed by any "section 4947(a) trust." A charitable remainder trust reports distribution of income and corpus under the "four tier system" by means of schedule K-1 (See Form 5227 instructions).

Every charitable remainder trust must have an employer identification number, which should be applied for as soon as the trust is created.

We should note that the trustee will be required to file a Form 8282 reporting the details of the sale of any property given to the trust (other than publicly traded securities or cash equivalents) if the sale occurs within three years after the gift to the trust.

The War Against Cancer

When you have the occasion to draft a trust or a bequest for a client who wants part of his or her estate to support the war against cancer, our correct legal name is:

"The American Institute for Cancer Research, a not-for-profit corporation located in Washington, DC."

Please feel free to contact our Gift Planning Office for additional information about the mission and the future plans of the American Institute for Cancer Research.

Our Gift Planning Office will be pleased to help you plan a trust or bequest that will accomplish the specific objectives of your client. We can also provide the exact tax consequences of any trust arrangement a client may want to consider. There is no other obligation for this service.

Information for the Attorney or Advisor

- AICR's official name:
  The American Institute for Cancer Research
- AICR's mailing address:
  1759 R Street, NW
  Washington, DC 20009
- AICR's phone number:
  202-328-7744 or 800-843-8114
- AICR's identification:
  A not-for-profit organization under Section 501(c)(3)
  of the Internal Revenue Service Code
- AICR's tax-exempt IRS number:
  52-1238026

The information and examples provided in this booklet are for information and discussion purposes only. The examples are hypothetical, and the facts and tax consequences of individual transactions may vary from person to person. Each estate planning professional must independently determine and evaluate the tax and financial consequences of each individual situation.

Gift Planning Office

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