

Grantor Trusts Demystified

Subtleties and nuances

Why attend?

The grantor trust rules under I.R.C. § 671-677 can be confusing. Understanding how these complicated code provisions work is a daunting task. A grantor trust is a trust in which the income is taxable to the settler (the grantor) because the settler has retained substantial control and is deemed by the code to be the owner of the trust assets. Thus, when a grantor retains such an interest or discretionary power over such a trust, practitioners must be careful to avoid the reach of § 671-677. The sophisticated estate planner and administrator must have a thorough knowledge of the subtleties and nuances of these complex rules. In this program, experienced practitioners guide you through the intricacies of the grantor trust rules, explaining how they work, so that you can serve your clients better.

The new revenue ruling analyzing the use of the power of substitution without triggering estate tax inclusion is also addressed.

You will learn...

- ▶ How the grantor trust rules work
- ▶ How to create intentionally "defective" grantor trusts
- ▶ How to use these rules in structuring grantor trusts for: QPRTs; Trusts to hold S-corporation stock; GRATs; Installment sales transactions and life insurance trusts

Agenda and written materials

- ▶ Analysis of § 671-677
- ▶ Avoiding Treatment as a Grantor Trust
- ▶ Specific Drafting Issues
- ▶ Payment of Income Tax on Income and Gain of Grantor Trusts as Nontaxable Transfers
- ▶ "Ask the Experts" Q&A Session

FACULTY

Ellen S. Berkowitz, Esq., Chair
Holland & Knight LLP, Boston
Lisa W. Burns, Esq.
Rackemann, Sawyer & Brewster, PC, Boston
George L. Cushing, Esq.
K&L Gates LLP, Boston
Nancy T. Hegarty, Esq.
Holland & Knight LLP, Boston

BOSTON

8:30 a.m. – 12:30 p.m.,
Thursday, July 9, 2009
MCLE Conference Center,
10 Winter Place, via Winter Street
Program No. 2090537P01

4 Substantive Credits

TUITION includes written materials

- ▶ MCLE Sponsor Members \$175
- ▶ MBA/BBA Members \$195
- ▶ All Others \$225

SPECIAL NEW LAWYER DISCOUNT

For new lawyers admitted after 2004, pending admittees, and law students who are

- ▶ MCLE Sponsor Members \$95
- ▶ MBA/BBA Members \$125

CAN'T ATTEND?

Available after July 16

-  Written materials
 - ▷ MCLE Sponsor Members . . . \$85
 - ▷ Nonmembers \$95
-  Audio CD
 - ▷ MCLE Sponsor Members . . \$120
 - ▷ Nonmembers \$135

Choose from 5 easy ways to register and order!

- ▶ **MAIL** this order form with payment to MCLE, Ten Winter Place, Boston, MA 02108-4751.
- ▶ **FAX** your credit card order 24 hours a day to 617-482-9498.
- ▶ **ONLINE** enter your credit card order at www.mcle.org.
- ▶ **CALL IN** your credit card order to 800-966-6253, Monday – Friday, 8:30 a.m. – 5:30 p.m.
- ▶ **WALK UP** on the day of the program or **DROP IN** to MCLE’s bookstore, Monday – Friday, 8:30 a.m. – 5:30 p.m.

1 CUSTOMER INFORMATION

Year Admitted to MA Bar _____ Title (if any) _____ BBO# _____

Last Name _____ First Name _____ Middle Initial _____

Firm/Agency _____

Street Address _____ Suite/Floor _____

City _____ State _____ ZIP+4 _____

Telephone _____ Fax _____

2 ORDER DETAILS

- PROGRAM:** Grantor Trusts Demystified; 2090537P01; Boston \$ _____
- PROGRAM MATERIALS:** Grantor Trusts Demystified; 2090537PMA \$ _____
- AUDIO CD:** Grantor Trusts Demystified; 2090537PCD \$ _____

▶ **Apply the discounted MCLE Sponsor Member prices to my order and sign me up as a Sponsor Member!**
 \$35 for lawyers admitted after 2004; \$95 for all others. To learn more, contact MCLE’s Sponsor Membership customer service representative at 1-800-966-6253 \$ _____

▶ **Scholarships are available for attorneys with financial need who certify that they are unable to attend a seminar without financial aid** by writing, faxing 617-482-9498 or e-mailing scholarships@mcle.org at least two weeks before the program.

Total \$ _____

3 PAYMENT METHOD

▶ **Order confirmation?** Enter your email address: _____

- Check payable to MCLE enclosed    

Card number _____ Expiration date _____

Cardholder’s name _____ Cardholder’s signature _____

MCLE

Keep raising the bar.®

PROGRAMS

BOSTON
 8:30 a.m. – 12:30 p.m.
 Thursday
 July 9, 2009

REGISTER...By mail, e-mail, phone, online, or at the door!

Subtleties and nuances

Grantor Trusts Demystified

