

# Charitable Remainder Trusts, 1999

## Data Release

Charitable remainder annuity trusts reported holding over \$9.7 billion in total assets (book value) at the end of Reporting Year 1999, a 12.2-percent increase from Reporting Year 1998. Charitable remainder unitrusts reported end-of-year total assets (book value) in excess of \$67.2 billion, a 23.8-percent increase from Reporting Year 1998 (Figure A). There were a total of 21,630 returns filed by annuity trusts, and 78,239 returns filed by unitrusts, a 7.4-percent and 20.5-percent increase in the number of returns filed by each type, respectively. Interestingly, the amount of total net capital gain income reported by annuity trusts decreased by 13.0 percent, from \$876 million for 1998 to \$762 million for 1999; distributions also decreased, from \$748 million (1998) to \$620 million (1999), a 17.2-percent drop. Unitrusts, however, saw no such decrease in total net capital gains or distributions. The amount of total net capital gain income reported by unitrusts increased by 28.9 percent, from \$8.2 billion for 1998 to \$10.5 billion for 1999; distributions increased by 6.9 percent, from \$4.4 billion (1998) to \$4.7 billion (1999). All data were collected from Form 5227, *Split Interest Trust Information Return*.

Split interest trusts file Form 5227 annually to report financial activity and to determine if the trust should be treated as a private foundation. Split interest trusts are complex trusts whose interests are charitable and non-charitable. They are not recognized as tax-exempt by the Internal Revenue Service, but, nonetheless, retain many characteristics of tax-exempt entities.

There are three main types of split interest trusts that file Form 5227: pooled income funds, charitable remainder trusts, and charitable lead trusts. Pooled income funds are entities created and managed by a charitable organization. Multiple donors contribute assets to a chosen fund, which then pays lifetime interest to those donors. All remaining interest is retained by the organization. In comparison, charitable lead trusts are established and maintained by a donor. The trust pays an annuity to a selected charitable organization for a limited number of years, after

which time all remaining assets are transferred to a noncharitable beneficiary. For the purposes of this study, data were collected only for the third type of split interest trusts, charitable remainder trusts [1]. There are two kinds of charitable remainder trusts—charitable remainder annuity trusts (CRAT's) and charitable remainder unitrusts (CRUT's).

Annuity trusts pay a *fixed amount* of their assets to a non-charitable beneficiary for a specified number of years, or until the beneficiary dies. The amount to be paid is determined when the trust is created, and is calculated by applying a specified percentage (not less than 5 percent nor greater than 50 percent) to the fair market value of the net assets initially placed in the trust. At the conclusion of the trust, the remaining assets are transferred to a selected charity (or charities). At the time of the trust's creation, the donor receives a tax deduction based on the estimated amount to be donated to charity in the future. Regulations require that the amount ultimately given to charity is 10 percent or more of the fair market value of the net assets initially placed in trust.

Charitable remainder unitrusts, similarly, determine the annual payment amount to non-charitable beneficiaries as a percentage of total net assets. However, unitrusts determine the payment amount by applying a specified percentage to the amount of net assets as they are valued each year. As with annuity trusts, the percentage used is determined when the trust is created, and can range from 5 percent to 50 percent. Also, the amount given to charity at the conclusion of the trust must be at least 10 percent of the fair market value of net assets initially placed in the trust.

There are two subsets of unitrusts that can also affect the payout amount to noncharitable beneficiaries. One variation is the net income CRUT (NI-CRUT). A NI-CRUT has the option to pay either the percentage of the fair market value of net assets, or the amount of income earned during the year, whichever is less. Under this arrangement, if the income earned (and thus paid) is less than the per-

Total net capital gain income reported by annuity trusts decreased by 13.0 percent; ... total net capital gain income reported by unitrusts increased by 28.9 percent.

*This data release was written by Melissa Belvedere, an economist with the Special Studies Special Projects Section, under the direction of Michael Alexander, Chief.*

# Charitable Remainder Trusts, 1999

Figure A

## Profile of Charitable Remainder Trusts, by Type of Trust, 1998 and 1999

[Money amounts are in thousands of dollars]

Item	Annuity trusts			Unitrusts		
	1998	1999	Percent change	1998	1999	Percent change
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns</b> .....	<b>20,137</b>	<b>21,630</b>	<b>7.4</b>	<b>64,923</b>	<b>78,239</b>	<b>20.5</b>
Net ordinary income <sup>1</sup> .....	315,951	334,978	6.0	1,810,023	2,291,729	26.6
Total net capital gains (losses) <sup>2</sup> .....	876,021	762,137	-13.0	8,182,883	10,545,419	28.9
Distributions <sup>3</sup> .....	748,448	619,667	-17.2	4,431,828	4,738,180	6.9
Total assets at end of year:						
Book value.....	8,648,497	9,706,993	12.2	54,283,685	67,208,886	23.8
Fair market value.....	N/A	N/A	N/A	64,304,568	81,181,933	26.2

N/A--Not applicable.

<sup>1</sup> "Net ordinary income" is taken from Form 5227, line 13, Ordinary Income Less Deductions.

<sup>2</sup> "Total net capital gains (losses)" are the sum of line 16 (net short-term capital gains) and line 19 (net long-term capital gains) from Form 5227.

<sup>3</sup> "Distributions" have been calculated as the difference between "Total accumulations" (sum of columns (a) through (d), line 22) and "Undistributed at end of tax year" (sum of columns (a) through (d), line 23).

centage amount, the distribution deficiency is not made up in future years. In contrast, a net income with makeup CRUT (NIM-CRUT) allows for the payment of the distribution deficiency in future years when the trust's actual income exceeds the percentage amount [2].

### Data Sources and Limitations

Tables 1, 2, and 3 present 1999 data for charitable remainder annuity trusts; Tables 4, 5, 6, and 7 present the same data for charitable remainder unitrusts.

All statistics presented in this data release were based on a sample of Forms 5227, *Split Interest Trust Information Return*, filed for Reporting Year 1999. Any charitable remainder trust having operations during Calendar Year 1999, and described under Internal Revenue Code (IRC) section 664, was required to file. The sample includes partial-year returns for trusts in which 1999 was either an initial or final reporting period. Returns included in the sample were computer-designated at the IRS Ogden Submission Processing Center after posting to the IRS Master File. The 1999 Study Year 1999 sample was stratified based on the type of organization (either annuity trust or unitrust) and the reported end-of-year fair market value of assets.

The sample rates for charitable remainder annuity trusts ranged from 0.31 percent for trusts with assets less than \$500,000 to 100 percent for trusts with assets of \$1,500,000 or more. Unitrusts sampling

rates ranged from 0.06 percent for trusts with assets less than \$1,000,000 to 100 percent for trusts holding assets worth at least \$3,000,000. The final sample size (excluding returns originally picked for the sample but later rejected) was 5,967. There were 1,357 annuity trusts and 4,610 unitrusts included in the sample. The population size was 99,869, of which there were 21,630 annuity trusts and 78,239 unitrusts. Returns were rejected if they were filed by a trust other than an annuity or unitrust, or if money amounts were unreported. Coefficients of variation are shown in Figure B, as a measure of sampling error.

Figure B

## Coefficients of Variation for Selected Items, by Type of Trust, 1999

Item	Annuity trusts	Unitrusts
	Coefficients of variation (percentages)	
Total ordinary income.....	5.94	9.28
Total deductions to ordinary income.....	11.06	14.00
Net ordinary income.....	6.72	10.08
Net short-term capital gains.....	35.59	19.81
Net long-term capital gains.....	19.81	15.90
End of year total assets (book value).....	4.43	4.43
End of year total assets (FMV).....	N/A	3.73
End of year total liabilities (book value).....	6.41	13.72
End of year total liabilities (FMV).....	N/A	8.27

N/A--Not applicable.

NOTE: "FMV" is the abbreviation for fair market value.

## Charitable Remainder Trusts, 1999

Due to the unreliability of data from Part III (Current Distributions Schedule), distribution amounts presented are derived from Part II (Accumulation Schedule).

The samples were designed to provide reliable estimates of financial activity. All data were collected from original returns as they were filed. All edited returns were subjected to comprehensive testing and data verification procedures to ensure the highest quality data possible. Changes made to the return, either by the taxpayer (by filing an amended return) or by administrative processing, were generally not incorporated. A complete discussion of the reliability of estimates based on samples, methods for evaluating the magnitude for both sampling and nonsampling error, and the precision of sample estimates are found in the Appendix in this issue of the *SOI Bulletin*.

### Explanation of Selected Terms

*Split interest trust*, according to the *1999 Instructions for Form 5227*.--A trust that "is not exempt from tax under section 501(a);...has some unexpired interests that are devoted to purposes other than religious, charitable, or similar purposes described in section 170(c)(2)(B);...and has amounts transferred in trust after May 26, 1969, for which a deduction was allowed under one of the Code sections listed in section 4947(a)(2)."

*Charitable*.--Refers to tax-exempt organizations with purposes that are charitable, educational, scientific, literary, or religious in nature.

Data for both annuity trusts and unitrusts are presented in terms of the size of fair market value of end-of-year assets. When discussing the size of trusts, the fair market value of assets used is the value reported on Line C of the first page of Form 5227; the size of the trust is *not* taken from the balance sheet. This is significant because annuity trusts do not have to provide information on the fair market value of their assets on the balance sheet (as opposed to unitrusts).

When looking at the tables presented, it appears as though a greater number of annuity trusts have either zero or unreported assets. This is not necessarily the case. Often, taxpayers inadvertently leave Line C on the first page blank if the trust in question is a unitrust, however, then the requisite information is determined from the balance sheet or its related attachments. No such correction is possible when an annuity trust leaves Line C blank.

The tables include information from trusts whose value of assets is zero at the end of the year (from the front page and/or the balance sheet). These trusts are possibly final-year filers. Final-year filers often report income and the values of their assets at the beginning of the year.

*Investments*.--Refer to the sum of Government obligations; corporate stock; corporate bonds; land, buildings, and equipment that is not held for charitable purposes; and other investments. "Securities" include Government obligations, corporate stock, and corporate bonds.

Data for net short-term capital gains should be used with caution because of the large coefficient of variation (CV) associated with them.

### Notes and References

- [1] Data for Reporting Year 1999 were collected using returns filed by charitable remainder trusts only, as were data from 1998. Beginning with Reporting Year 2000, the study will include for the first time charitable lead trust and pooled income fund data. An article containing data from the Reporting Year 2000 study is scheduled to appear in the Winter 2002-2003 *Bulletin*.
- [2] For detailed information and data on charitable remainder trusts for 1998, see Belvedere, Melissa, "Charitable Remainder Trusts, 1998," *Statistics of Income Bulletin*, Winter 2000-2001, Volume 20, Number 3.

Source: IRS Statistics of Income Bulletin, Summer 2002, Publication 1136 (Rev. 08-2002.)

# Charitable Remainder Trusts, 1999

**Table 1.--Charitable Remainder Annuity Trusts: Selected Income Information, by Size of Fair Market Value of Total Assets, 1999**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets					
		Zero or not reported <sup>1</sup>	\$1 under \$500,000	\$500,000 under \$1,500,000	\$1,500,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Number of returns.....</b>	<b>21,630</b>	<b>*1,607</b>	<b>15,752</b>	<b>3,026</b>	<b>713</b>	<b>425</b>	<b>108</b>
<b>Total net income.....</b>	<b>1,097,114</b>	<b>*13,765</b>	<b>128,494</b>	<b>358,717</b>	<b>161,266</b>	<b>209,289</b>	<b>225,584</b>
<b>Ordinary income:</b>							
<b>Gross ordinary income.....</b>	<b>387,067</b>	<b>*7,403</b>	<b>71,939</b>	<b>99,134</b>	<b>43,386</b>	<b>55,088</b>	<b>110,117</b>
Interest income.....	201,331	*5,628	51,289	39,791	20,274	28,577	55,773
Dividends.....	156,439	*1,775	18,602	38,397	19,127	24,314	54,225
Business income (loss).....	*188	--	--	--	*-31	*219	--
Rents, royalties, partnerships, other estates and trusts.....	4,802	--	*2,047	*-136	1,955	881	54
Farm income (loss).....	*569	--	--	--	*561	*8	--
Ordinary gain (loss).....	*88	--	--	--	*89	*-1	--
Other income.....	23,648	--	--	*21,081	1,411	1,091	65
<b>Total allocable deductions.....</b>	<b>52,084</b>	<b>*1,490</b>	<b>4,695</b>	<b>15,966</b>	<b>6,552</b>	<b>8,766</b>	<b>14,614</b>
Interest.....	221	--	*1	*87	91	*26	*16
Taxes.....	1,387	--	*162	*612	185	218	210
Other deductions.....	50,490	*1,490	4,532	15,266	6,289	8,523	14,389
<b>Net ordinary income <sup>2</sup>.....</b>	<b>334,978</b>	<b>*5,912</b>	<b>67,243</b>	<b>83,168</b>	<b>36,834</b>	<b>46,318</b>	<b>95,502</b>
<b>Capital gain (loss):</b>							
<b>Short-term capital gain (loss):</b>							
Gross gain (loss).....	8,112	*-190	240	-2,284	1,518	3,191	5,636
Allocable deductions.....	487	--	*1	*1	141	170	*174
Net gain (loss) <sup>3</sup> .....	7,625	*-190	238	-2,285	1,378	3,021	5,461
<b>Long-term capital gain (loss):</b>							
Gross gain (loss).....	766,173	*8,042	61,885	285,757	124,289	161,100	125,100
Allocable deductions.....	12,011	--	*872	*7,923	1,236	1,500	480
Net gain (loss) <sup>4</sup> .....	754,512	*8,042	61,013	277,834	123,054	159,950	124,621

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>1</sup> Includes returns that do not report the fair market value of their assets on the first page of Form 5227, or that report this amount as zero. Often, this amount is reported as zero for those trusts filing a final return. In these cases, the trusts report having assets at the beginning of the year but nothing at the end of the year.

<sup>2</sup> Taken from "ordinary income less deductions" on line 13 of Form 5227. This amount may not equal "total ordinary income" (line 8) less "total deductions allocable to ordinary income" (line 12) due to taxpayer reporting error.

<sup>3</sup> Taken from Form 5227, line 16.

<sup>4</sup> Taken from Form 5227, line 19.

NOTE: Details may not add to total due to rounding and taxpayer reporting discrepancies.

# Charitable Remainder Trusts, 1999

**Table 2.--Charitable Remainder Annuity Trusts: Accumulation Information, by Size of Fair Market Value of Total Assets, 1999 <sup>1</sup>**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets					
		Zero or not reported <sup>2</sup>	\$1 under \$500,000	\$500,000 under \$1,500,000	\$1,500,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
		(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns.....</b>	<b>21,630</b>	<b>*1,607</b>	<b>15,752</b>	<b>3,026</b>	<b>713</b>	<b>425</b>	<b>108</b>
<b>Total accumulations.....</b>	<b>5,411,632</b>	<b>*109,168</b>	<b>677,394</b>	<b>1,381,417</b>	<b>692,183</b>	<b>1,068,919</b>	<b>1,482,552</b>
Ordinary income.....	606,985	*5,912	129,086	112,182	66,797	110,845	182,162
Net short-term capital gain income.....	40,392	*-190	1,212	2,398	8,469	11,623	16,879
Net long-term capital gain income.....	4,453,353	*89,123	528,527	1,195,569	591,081	896,416	1,152,636
Nontaxable income.....	310,903	*14,322	18,569	*71,268	25,836	50,034	130,874
<b>Prior year undistributed income.....</b>	<b>4,142,449</b>	<b>*81,081</b>	<b>536,563</b>	<b>1,016,123</b>	<b>524,838</b>	<b>841,157</b>	<b>1,142,686</b>
Ordinary income.....	272,007	--	61,843	*29,014	29,963	64,527	86,660
Net short-term capital gain income.....	32,764	--	*970	*4,683	7,091	8,602	11,418
Net long-term capital gain income.....	3,698,843	*81,081	467,517	917,735	468,027	736,466	1,028,016
Nontaxable income.....	138,835	--	*6,233	*64,691	19,756	31,562	16,593
<b>Current year net income.....</b>	<b>1,269,183</b>	<b>*28,087</b>	<b>140,830</b>	<b>365,293</b>	<b>167,346</b>	<b>227,762</b>	<b>339,865</b>
Ordinary income.....	334,978	*5,912	67,243	83,168	36,834	46,318	95,502
Net short-term capital gain income.....	7,624	*-190	238	-2,285	1,378	3,021	5,461
Net long-term capital gain income.....	754,512	*8,042	61,013	277,834	123,054	159,950	124,621
Nontaxable income.....	172,069	*14,322	*12,337	*6,577	6,080	18,472	114,281
<b>Current year distributions <sup>3</sup>.....</b>	<b>619,667</b>	<b>*23,752</b>	<b>102,395</b>	<b>145,392</b>	<b>66,160</b>	<b>102,527</b>	<b>179,439</b>
Ordinary income.....	320,659	*5,912	60,868	76,022	34,207	42,614	101,036
Net short-term capital gain income.....	250	*76	-1,199	594	1,269	2,787	-3,276
Net long-term capital gain income.....	230,563	*3,722	29,944	62,088	26,744	50,431	57,585
Nontaxable income.....	68,195	*13,993	12,782	*6,689	3,940	6,695	24,095
<b>Undistributed at end of tax year.....</b>	<b>4,791,965</b>	<b>*85,416</b>	<b>574,998</b>	<b>1,236,024</b>	<b>626,023</b>	<b>966,392</b>	<b>1,303,112</b>
Ordinary income.....	286,326	--	68,217	*36,160	32,590	68,232	81,127
Net short-term capital gain income.....	40,141	*-265	*2,411	*1,804	7,201	8,836	20,155
Net long-term capital gain income.....	4,222,789	*85,352	498,582	1,133,481	564,337	845,985	1,095,052
Nontaxable income.....	242,709	*329	*5,787	*64,578	21,896	43,339	106,779

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>1</sup> All information presented in this table is taken from Part II, the Accumulation Schedule, Form 5227.

<sup>2</sup> Includes returns that do not report the fair market value of their assets on the first page of Form 5227, or that report this amount as zero. Often, this amount is reported as zero for those trusts filing a final return. In these cases, the trusts report having assets at the beginning of the year but nothing at the end of the year.

<sup>3</sup> All reported distribution amounts are calculated as the difference of "total accumulations" (line 22) less "undistributed at end of tax year" (line 23).

NOTE: Details may not add to total due to rounding and taxpayer reporting discrepancies.

# Charitable Remainder Trusts, 1999

**Table 3.--Charitable Remainder Annuity Trusts: Book Value Balance Sheet Information, by Size of Fair Market Value of Total Assets, 1999**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets					
		Zero or not reported <sup>1</sup>	\$1 under \$500,000	\$500,000 under \$1,500,000	\$1,500,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Number of returns.....</b>	<b>21,630</b>	<b>*1,607</b>	<b>15,752</b>	<b>3,026</b>	<b>713</b>	<b>425</b>	<b>108</b>
<b>Total net assets (end of year) <sup>2</sup>.....</b>	<b>9,155,295</b>	<b>*474,419</b>	<b>1,575,182</b>	<b>2,243,504</b>	<b>1,132,026</b>	<b>1,637,498</b>	<b>2,092,667</b>
<b>Total liabilities and net assets</b>							
<b>(end of year) <sup>3</sup>.....</b>	<b>9,645,618</b>	<b>*475,162</b>	<b>1,617,232</b>	<b>2,258,598</b>	<b>1,148,819</b>	<b>1,657,526</b>	<b>2,488,280</b>
<b>Total assets (end of year).....</b>	<b>9,706,993</b>	<b>*475,162</b>	<b>1,617,268</b>	<b>2,262,095</b>	<b>1,148,692</b>	<b>1,666,749</b>	<b>2,537,027</b>
Cash.....	262,522	*3,647	43,990	*105,955	21,337	25,108	62,484
Savings and temporary cash investments.....	605,047	*18,038	70,695	92,187	81,548	127,964	214,614
Net accounts receivable.....	16,484	--	*52	*286	341	2,740	*13,065
Receivables from disqualified persons.....	*1,501	--	--	--	*1,501	--	--
Net other notes receivable.....	388,060	--	*85,921	*250,075	26,645	11,667	*13,751
Inventories for sale or use.....	--	--	--	--	--	--	--
Prepaid expenses.....	1,103	--	--	--	*123	*919	*61
Total investments.....	8,110,767	*453,410	1,411,183	1,812,719	985,654	1,424,672	2,023,129
Securities.....	6,507,806	*453,410	1,072,019	1,460,072	791,604	1,150,785	1,579,915
Government obligations.....	1,898,638	*321,140	324,570	*335,182	187,706	293,814	436,228
Corporate stock.....	3,269,479	*67,923	418,490	834,288	466,711	656,261	825,806
Corporate bonds.....	1,339,689	*64,348	328,959	290,602	137,187	200,710	317,882
Land, buildings, and equipment.....	58,696	--	*27,312	--	13,884	17,462	*38
Other investments.....	1,544,265	--	311,851	*352,647	180,165	256,426	443,176
Charitable purpose land, buildings, and equipment.....	16,388	--	--	--	6,341	9,960	*87
Other assets.....	305,117	*67	5,425	*872	25,200	63,718	209,836
<b>Total liabilities (end of year).....</b>	<b>477,418</b>	<b>*743</b>	<b>42,086</b>	<b>*15,095</b>	<b>7,488</b>	<b>20,042</b>	<b>391,964</b>
Accounts payable, accrued expenses.....	8,214	--	*2,521	--	1,600	3,229	*864
Deferred revenue.....	16,874	--	--	--	*1,530	*3,838	*11,506
Loans from disqualified persons.....	*222	--	*147	--	*75	--	--
Mortgages and notes payable.....	3,172	--	*10	--	*552	*2,575	*35
Other liabilities.....	448,936	*743	*39,408	*15,095	3,731	10,400	379,559

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>1</sup> Includes returns that do not report the fair market value of their assets on the first page of Form 5227, or that report this amount as zero. Often, this amount is reported as zero for those trusts filing a final return. In these cases, the trusts reporting having assets at the beginning of the year but nothing at the end of the year.

<sup>2</sup> Taken from "total net assets" (line 46, column (b)) of Form 5227.

<sup>3</sup> Taken from "total liabilities and net assets" (line 47, column (b)) of Form 5227. This amount may not equal "total liabilities" (line 43, column (b)) plus total net assets (line 46, column (b)) due to taxpayer reporting error.

NOTE: Details may not add to total due to rounding and taxpayer reporting discrepancies.

# Charitable Remainder Trusts, 1999

**Table 4.--Charitable Remainder Unitrusts: Selected Income Information, by Size of Fair Market Value of Total Assets, 1999**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets					
		Zero or not reported <sup>1</sup>	\$1 under \$500,000	\$500,000 under \$1,500,000	\$1,500,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Number of returns.....</b>	<b>78,239</b>	<b>*1,728</b>	<b>45,275</b>	<b>21,467</b>	<b>5,682</b>	<b>3,270</b>	<b>816</b>
<b>Total net income.....</b>	<b>12,837,148</b>	<b>*-2,470</b>	<b>1,766,440</b>	<b>3,343,391</b>	<b>1,592,528</b>	<b>2,504,778</b>	<b>3,632,481</b>
<b>Ordinary income:</b>							
<b>Gross ordinary income.....</b>	<b>2,738,643</b>	<b>*751</b>	<b>370,905</b>	<b>747,785</b>	<b>404,495</b>	<b>475,078</b>	<b>739,629</b>
Interest income.....	1,014,872	--	107,297	211,945	157,286	187,369	350,974
Dividends.....	1,140,374	*751	108,686	329,751	164,460	217,780	318,945
Business income (loss).....	-2,717	--	*-4,248	--	--	1,468	*64
Rents, royalties, partnerships, other estates and trusts.....	196,483	--	*6,736	114,460	9,366	24,648	41,273
Farm income (loss).....	*-207	--	--	--	--	-168	*-40
Ordinary gain (loss).....	2,293	--	--	--	*-3	2,726	*-430
Other income.....	387,544	--	*152,435	91,628	73,385	41,254	28,843
<b>Total allocable deductions.....</b>	<b>446,911</b>	<b>*3,939</b>	<b>28,296</b>	<b>85,002</b>	<b>115,586</b>	<b>76,214</b>	<b>137,876</b>
Interest.....	31,212	--	--	*668	1,181	1,554	27,809
Taxes.....	6,848	--	*2	1,058	1,916	1,778	2,094
Other deductions.....	409,216	*3,939	28,293	83,275	112,489	73,075	108,144
<b>Net ordinary income <sup>2</sup>.....</b>	<b>2,291,729</b>	<b>*-3,187</b>	<b>342,608</b>	<b>662,783</b>	<b>288,908</b>	<b>398,864</b>	<b>601,754</b>
<b>Capital gain (loss):</b>							
<b>Short-term capital gain (loss):</b>							
Gross gain (loss).....	605,456	*126	57,211	219,427	53,182	101,805	173,706
Allocable deductions.....	28,733	--	*1,232	14,889	2,015	2,814	7,784
Net gain (loss) <sup>3</sup> .....	576,723	*126	55,979	204,538	51,167	98,992	165,922
<b>Long-term capital gain (loss):</b>							
Gross gain (loss).....	10,046,303	*591	1,376,012	2,489,271	1,260,350	2,022,769	2,897,309
Allocable deductions.....	77,606	--	8,157	13,201	7,897	15,847	32,504
Net gain (loss) <sup>4</sup> .....	9,968,695	*591	1,367,853	2,476,071	1,252,453	2,006,922	2,864,805

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>1</sup> Includes returns that do not report the fair market value of their assets on the first page of Form 5227, or that report this amount as zero. Often, this amount is reported as zero for those trusts filing a final return. In these cases, the trusts report having assets at the beginning of the year but nothing at the end of the year.

<sup>2</sup> Taken from "ordinary income less deductions" on line 13 of Form 5227. This amount may not equal "total ordinary income" (line 8) less "total deductions allocable to ordinary income" (line 12) due to taxpayer reporting error.

<sup>3</sup> Taken from Form 5227, line 16.

<sup>4</sup> Taken from Form 5227, line 19.

NOTE: Details may not add to total due to rounding and taxpayer reporting discrepancies.

# Charitable Remainder Trusts, 1999

**Table 5.--Charitable Remainder Unitrusts: Accumulation Information, by Size of Fair Market Value of Total Assets, 1999 <sup>1</sup>**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets					
		Zero or not reported <sup>2</sup>	\$1 under \$500,000	\$500,000 under \$1,500,000	\$1,500,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
		(1)	(2)	(3)	(4)	(5)	(6)
<b>Number of returns.....</b>	<b>78,239</b>	<b>*1,728</b>	<b>45,275</b>	<b>21,467</b>	<b>5,682</b>	<b>3,270</b>	<b>816</b>
<b>Total accumulations.....</b>	<b>49,747,763</b>	<b>*-5,155</b>	<b>5,067,960</b>	<b>11,096,257</b>	<b>6,739,074</b>	<b>10,240,852</b>	<b>16,608,774</b>
Ordinary income.....	3,425,750	*-12,454	417,668	773,034	482,794	567,189	1,197,520
Net short-term capital gain income.....	1,425,967	*563	67,738	233,382	167,368	255,186	701,730
Net long-term capital gain income.....	44,129,833	*6,755	4,235,888	10,043,512	6,054,135	9,309,299	14,480,245
Nontaxable income.....	766,213	*-19	346,666	46,330	34,778	109,179	229,279
<b>Prior year undistributed income.....</b>	<b>36,623,189</b>	<b>*2,685</b>	<b>3,278,930</b>	<b>7,740,565</b>	<b>5,143,145</b>	<b>7,671,212</b>	<b>12,792,023</b>
Ordinary income.....	1,134,021	*-9,267	75,060	110,251	193,885	168,325	595,766
Net short-term capital gain income.....	849,244	*437	11,759	28,844	116,202	156,194	535,808
Net long-term capital gain income.....	34,151,904	*6,164	2,868,033	7,567,441	4,801,681	7,293,145	11,615,440
Nontaxable income.....	488,020	*-19	*324,077	34,029	31,376	53,548	45,009
<b>Current year net income.....</b>	<b>13,124,615</b>	<b>*-2,470</b>	<b>1,789,027</b>	<b>3,355,692</b>	<b>1,595,929</b>	<b>2,569,685</b>	<b>3,816,752</b>
Ordinary income.....	2,291,730	*-3,187	342,608	662,783	288,909	398,864	601,754
Net short-term capital gain income.....	576,723	*126	55,979	204,538	51,166	98,992	165,922
Net long-term capital gain income.....	9,977,971	*591	1,367,853	2,476,071	1,252,453	2,016,198	2,864,805
Nontaxable income.....	278,191	--	*22,587	12,301	3,402	55,631	184,271
<b>Current year distributions <sup>3</sup>.....</b>	<b>4,738,180</b>	<b>*-5,155</b>	<b>643,416</b>	<b>1,252,645</b>	<b>790,361</b>	<b>927,274</b>	<b>1,129,639</b>
Ordinary income.....	2,048,462	*-12,454	345,371	692,432	297,528	372,233	353,352
Net short-term capital gain income.....	288,280	*563	44,767	100,016	28,491	37,712	76,731
Net long-term capital gain income.....	2,287,167	*6,755	233,940	457,155	463,758	489,797	635,761
Nontaxable income.....	114,270	*-19	19,338	3,042	584	27,531	63,795
<b>Undistributed at end of tax year.....</b>	<b>45,009,584</b>	<b>--</b>	<b>4,424,544</b>	<b>9,843,612</b>	<b>5,948,713</b>	<b>9,313,579</b>	<b>15,479,135</b>
Ordinary income.....	1,377,288	--	72,297	80,602	185,265	194,956	844,168
Net short-term capital gain income.....	1,137,686	--	22,971	133,365	138,877	217,473	624,999
Net long-term capital gain income.....	41,842,667	--	4,001,948	9,586,357	5,590,376	8,819,502	13,844,483
Nontaxable income.....	651,943	--	327,328	43,288	34,194	81,647	165,485

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>1</sup> All information presented in this table is taken from Part II, the Accumulation Schedule, Form 5227.

<sup>2</sup> Includes returns that do not report the fair market value of their assets on the first page of Form 5227, or that report this amount as zero. Often, this amount is reported as zero for those trusts filing a final return. In these cases, the trusts report having assets at the beginning of the year but nothing at the end of the year.

<sup>3</sup> All reported distribution amounts are calculated as the difference of "total accumulations" (line 22) less "undistributed at end of tax year" (line 23).

NOTE: Details may not add to total due to rounding and taxpayer reporting discrepancies.



# Charitable Remainder Trusts, 1999

**Table 6.--Charitable Remainder Unitrusts: Book Value Balance Sheet Information, by Size of Fair Market Value of Total Assets, 1999**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets					
		Zero or not reported <sup>1</sup>	\$1 under \$500,000	\$500,000 under \$1,500,000	\$1,500,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Number of returns.....</b>	<b>78,239</b>	<b>1,728</b>	<b>45,275</b>	<b>21,467</b>	<b>5,682</b>	<b>3,270</b>	<b>816</b>
<b>Total net assets (end of year) <sup>2</sup>.....</b>	<b>65,920,122</b>	--	<b>7,278,839</b>	<b>16,074,209</b>	<b>9,681,492</b>	<b>12,710,065</b>	<b>20,175,517</b>
<b>Total liabilities and net</b>							
<b>assets (end of year) <sup>3</sup>.....</b>	<b>67,077,469</b>	--	<b>7,423,684</b>	<b>16,197,277</b>	<b>9,897,689</b>	<b>12,952,869</b>	<b>20,605,951</b>
<b>Total assets (end of year).....</b>	<b>67,208,886</b>	--	<b>7,423,684</b>	<b>16,106,490</b>	<b>10,035,313</b>	<b>13,031,736</b>	<b>20,611,664</b>
Cash .....	1,955,218	--	648,496	203,102	402,695	263,973	436,953
Savings and temporary cash investments.....	5,564,095	--	1,135,084	1,145,145	786,371	1,095,036	1,402,460
Net accounts receivable.....	108,157	--	*20,538	2,713	9,284	26,204	49,418
Receivables from disqualified persons.....	16,308	--	--	--	*13	1,983	*14,311
Net other notes receivable.....	1,137,703	--	*225,187	*16,559	419,221	255,387	221,350
Inventories for sale or use.....	--	--	--	--	--	--	--
Prepaid expenses.....	14,903	--	*1	27	*1,451	4,625	8,799
<b>Total investments.....</b>	<b>54,298,570</b>	--	<b>4,670,399</b>	<b>13,402,075</b>	<b>7,970,293</b>	<b>10,672,874</b>	<b>17,582,930</b>
<b>Securities.....</b>	<b>38,472,663</b>	--	<b>2,879,989</b>	<b>11,074,514</b>	<b>6,325,018</b>	<b>8,261,248</b>	<b>9,931,893</b>
Government obligations.....	4,954,320	--	*517,119	1,087,591	752,616	1,211,796	1,385,198
Corporate stock.....	28,153,627	--	1,881,903	8,868,503	4,549,527	5,928,654	6,925,039
Corporate bonds.....	5,364,716	--	480,966	1,118,420	1,022,875	1,120,798	1,621,656
Land, buildings, and equipment.....	813,085	--	*140,930	*323,652	*121,905	119,275	107,322
Other investments.....	15,012,822	--	1,649,479	2,003,909	1,523,369	2,292,351	7,543,714
Charitable purpose land, buildings, and equipment.....	228,850	--	--	*7,384	*76,900	72,534	*72,033
Other assets.....	3,799,218	--	*723,967	1,329,486	369,084	563,139	813,542
<b>Total liabilities (end of year).....</b>	<b>1,106,361</b>	--	<b>144,832</b>	<b>119,846</b>	<b>216,186</b>	<b>207,318</b>	<b>418,180</b>
Accounts payable, accrued expenses.....	265,735	--	*33,069	36,024	63,154	61,616	71,871
Deferred revenue.....	27,356	--	--	--	*5,391	15,920	*6,044
Loans from disqualified persons.....	*1,080	--	--	--	--	*904	*177
Mortgages and notes payable.....	200,997	--	--	*17,214	*4,157	17,998	*161,629
Other liabilities.....	611,193	--	*111,762	66,608	143,483	110,881	178,459

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>1</sup> Includes returns that do not report the fair market value of their assets on the first page of Form 5227, or that report this amount as zero. Often, this amount is reported as zero for those trusts filing a final return. In these cases, the trusts report having assets at the beginning of the year but nothing at the end of the year.

<sup>2</sup> Taken from "total net assets" (line 46, column (b)) of Form 5227.

<sup>3</sup> Taken from "total liabilities and net assets" (line 47, column (b)) of Form 5227. This amount may not equal "total liabilities" (line 43, column (b)) plus total net assets (line 46, column (b)) due to taxpayer reporting error.

NOTE: Details may not add to total due to rounding and taxpayer reporting discrepancies.

# Charitable Remainder Trusts, 1999

**Table 7.--Charitable Remainder Unitrusts: Fair Market Value Balance Sheet Information, by Size of Fair Market Value of Total Assets, 1999**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets					
		Zero or not reported <sup>1</sup>	\$1 under \$500,000	\$500,000 under \$1,500,000	\$1,500,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<b>Number of returns.....</b>	<b>78,239</b>	<b>1,728</b>	<b>45,275</b>	<b>21,467</b>	<b>5,682</b>	<b>3,270</b>	<b>816</b>
<b>Total assets (end of year).....</b>	<b>81,181,933</b>	--	<b>8,145,574</b>	<b>18,365,736</b>	<b>11,694,537</b>	<b>16,500,650</b>	<b>26,475,436</b>
Cash .....	1,546,757	--	369,425	258,587	219,886	263,291	435,568
Savings and temporary cash investments.....	5,459,195	--	887,513	1,367,884	564,932	1,098,922	1,539,945
Net accounts receivable.....	102,048	--	*10,423	1,469	13,121	31,410	45,626
Receivables from disqualified persons.....	15,860	--	--	--	*102	2,341	*13,416
Net other notes receivable.....	1,184,238	--	*209,410	*11,051	454,120	247,692	261,964
Inventories for sale or use.....	*138	--	--	--	--	*138	--
Prepaid expenses.....	11,153	--	*1	*850	*1,471	3,545	5,285
Total investments.....	67,549,170	--	5,764,798	15,092,888	9,748,923	13,997,299	22,945,262
Securities.....	49,105,374	--	4,137,037	11,778,798	7,709,269	11,214,063	14,266,207
Government obligations.....	5,171,969	--	*539,468	1,147,493	730,536	1,220,238	1,534,234
Corporate stock.....	39,568,814	--	3,073,072	10,155,087	6,083,987	8,890,090	11,366,578
Corporate bonds.....	4,364,591	--	524,497	476,217	894,746	1,103,735	1,365,395
Land, buildings, and equipment.....	1,770,120	--	*283,849	*861,842	197,017	247,755	179,657
Other investments.....	16,673,676	--	1,343,912	2,452,248	1,842,637	2,535,481	8,499,398
Charitable purpose land, buildings, and equipment.....	850,315	--	*172,758	*157,029	*277,727	126,113	116,687
Other assets.....	4,450,384	--	*731,238	1,475,977	414,253	729,837	1,099,078
<b>Total liabilities (end of year).....</b>	<b>1,030,280</b>	--	<b>*46,330</b>	<b>48,043</b>	<b>120,202</b>	<b>177,118</b>	<b>638,587</b>
Accounts payable, accrued expenses.....	224,728	--	*46,236	12,498	33,536	70,407	62,051
Deferred revenue.....	9,043	--	--	--	*4,941	2,609	*1,493
Loans from disqualified persons.....	*1,309	--	--	--	--	*386	*923
Mortgages and notes payable.....	174,588	--	--	*9,569	*62	14,578	*150,380
Other liabilities.....	620,611	--	*93	25,977	81,664	89,138	423,740

\* Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>1</sup> Includes returns that do not report the fair market value of their assets on the first page of Form 5227, or that report this amount as zero. Often, this amount is reported as zero for those trusts filing a final return. In these cases, the trusts report having assets at the beginning of the year but nothing at the end of the year.

NOTE: Details may not add to total due to rounding and taxpayer reporting discrepancies.