

**QUALIFIED
PERSONAL
RESIDENCE TRUST
(QPRT)**



Personal residence is gifted into trust and is held for the use by, and benefit of, the grantor for a term of years (the “QPRT Term”). If grantor survives QPRT Term, all assets pass estate tax free.

At End of QPRT Term,
If Grantor Survives:

FAMILY TRUST

All assets will be held in the Family Trust for the benefit of grantor’s surviving spouse and/or descendants. The surviving spouse will have sole right to use the residence after the QPRT Term. Upon the death of the surviving spouse, or upon the expiration of the QPRT Term if there was no surviving spouse, the grantor reserves the right to lease the residence from the Family Trust for fair market rent. Rent payments are NOT considered additional gifts to the QPRT.

Assets allocated GST exemption at end of QPRT Term will flow to the GST Exempt Trusts. All other assets will flow to the GST Non-Exempt Trusts.

At Death of Both Spouses:

LIFETIME TRUSTS FOR BENEFICIARIES (GST NON-EXEMPT)

GST non-exempt portion subject to estate tax at each beneficiary’s death. Otherwise, assets may provide income and/or principal to beneficiaries.

LIFETIME TRUSTS FOR BENEFICIARIES (GST EXEMPT)

GST exempt portion not subject to estate tax at each beneficiary’s death. Assets may provide income and/or principal to beneficiaries.