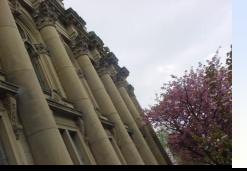


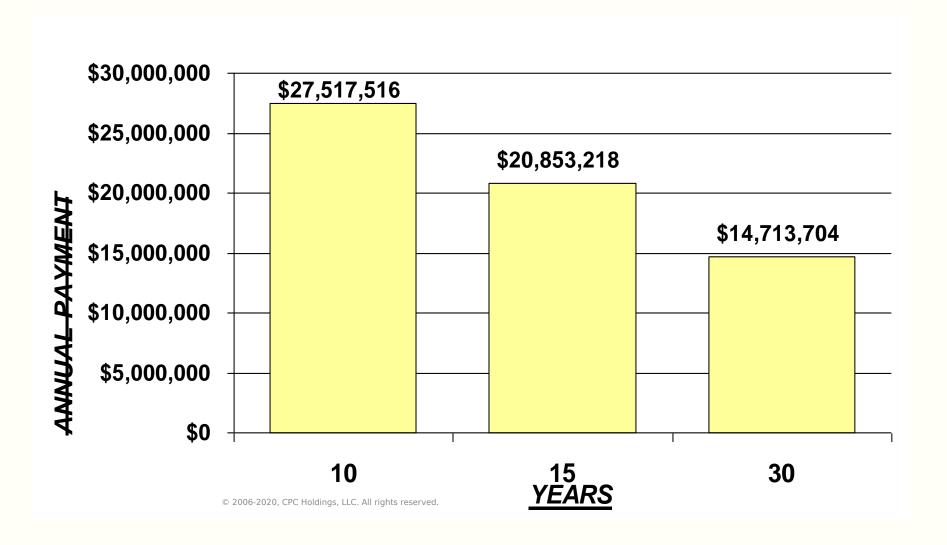
Emanuel J. Kallina, II, Esquire Kallina & Associates, LLC Baltimore, Maryland



Benefits to the Charity



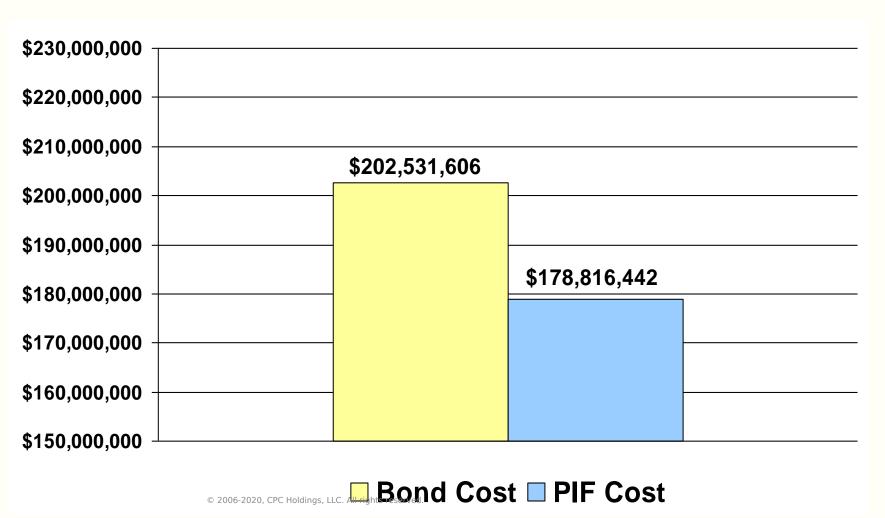
\$200,000,000 Bond Financing @ 6%





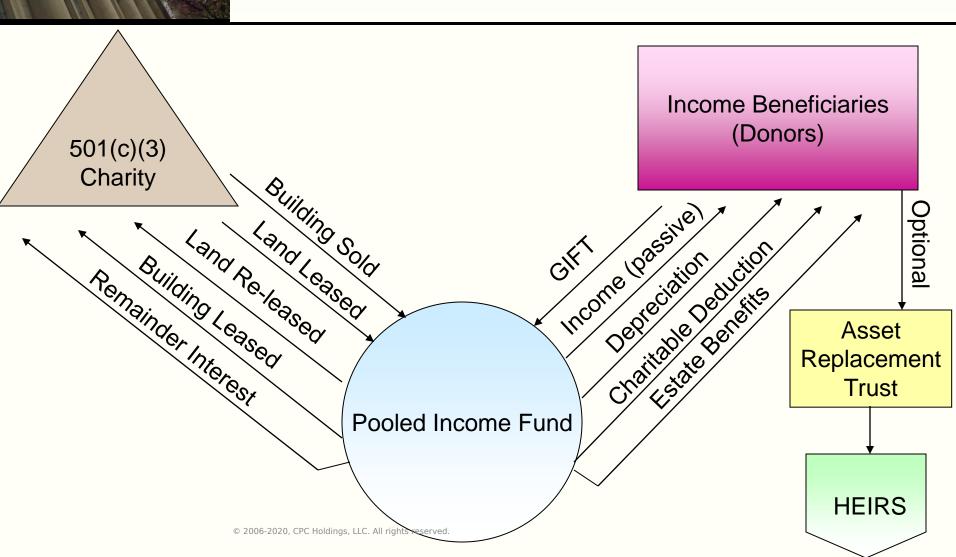
Bond vs. PIF Financing

\$200,000,000 Financing Bond @ 6% vs. PIF @ 7%



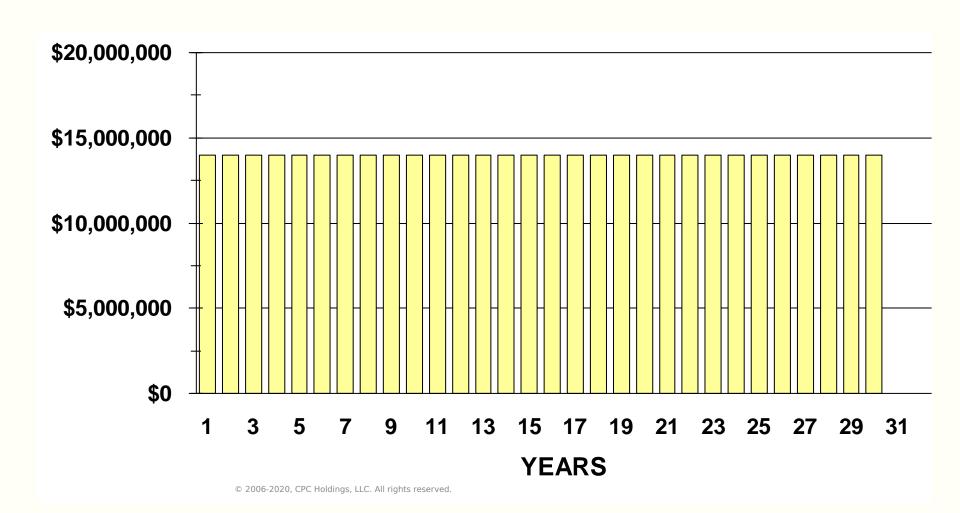


The Real Estate Pooled Income Fund



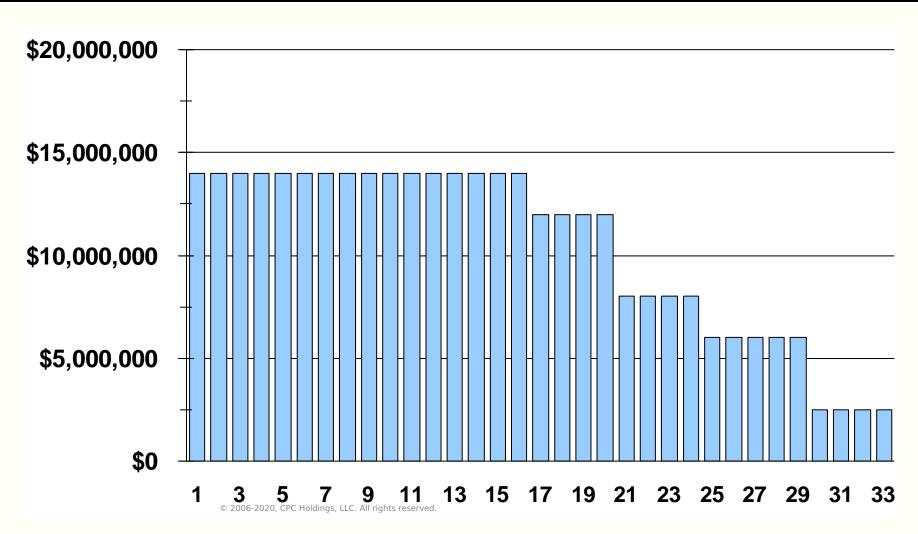


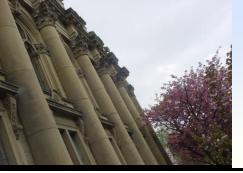
\$200,000,000 Bond Financing 30 YEAR BOND @ 6%



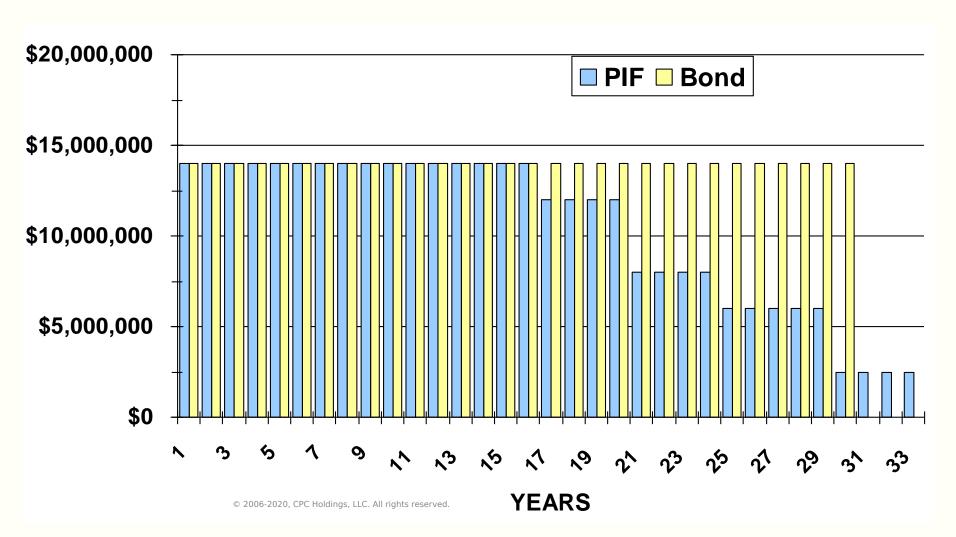


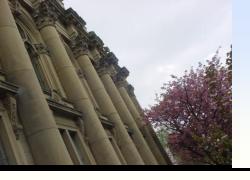
\$200,000,000 PIF Financing 33 Year PIF @ 7%





30 Year Bond @ 6% vs. 33 Year PIF @ 7%





Bond vs. Pooled Income Fund

Bond Financing:

Principal Amount

Less Cost @ 1.25%

Goal

Interest Rate

Amortization Period 10 Years 15 Years 30 Years \$202,531,646 (\$2,531,646) \$200,000,000

6.00%

Annual Debt \$27,517,561 \$20,853,218 \$14,713,704



Bond vs. Pooled Income Fund

Pooled Income Fund:

Principal Amount:

Less Cost @ 3.00%

Goal

Interest (Lease) Rate

\$206,185,567

(\$6,185,567)

\$200,000,000

7.00%

200 Equal Investors:

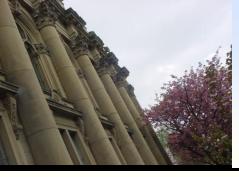
40 At Age 50 Life Expectancy = 33 Years

40 At Age 55 Life Expectancy = 29 Years

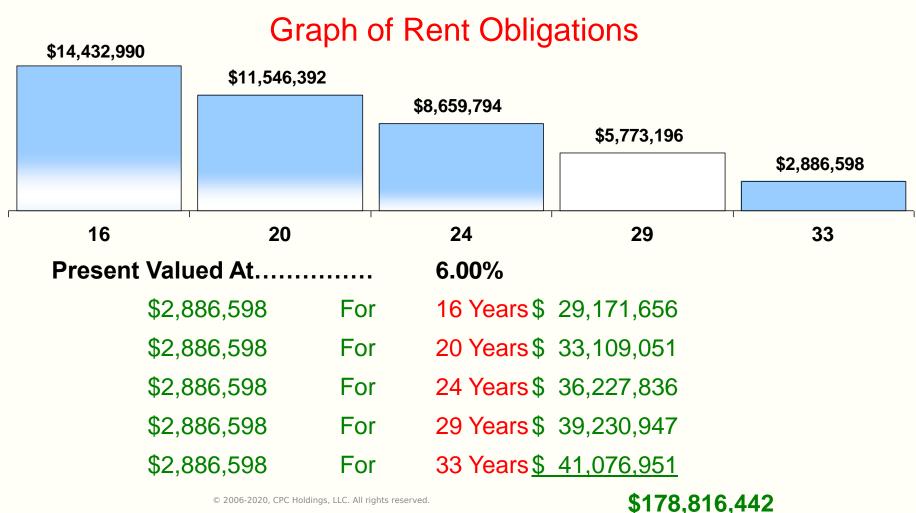
40 At Age 60 Life Expectancy = 24 Years

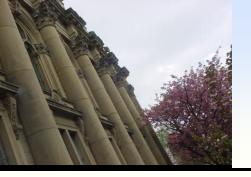
40 At Age 65 Life Expectancy = 20 Years

40 At Age 70 Life Expectancy = 16 Years



Bond vs. Pooled Income Fund





Bond vs. Pooled Income Fund

Bond Financing Cost: \$202,531,646

Pooled Income Fund Cost: \$178,816,442

NET SAVINGS:

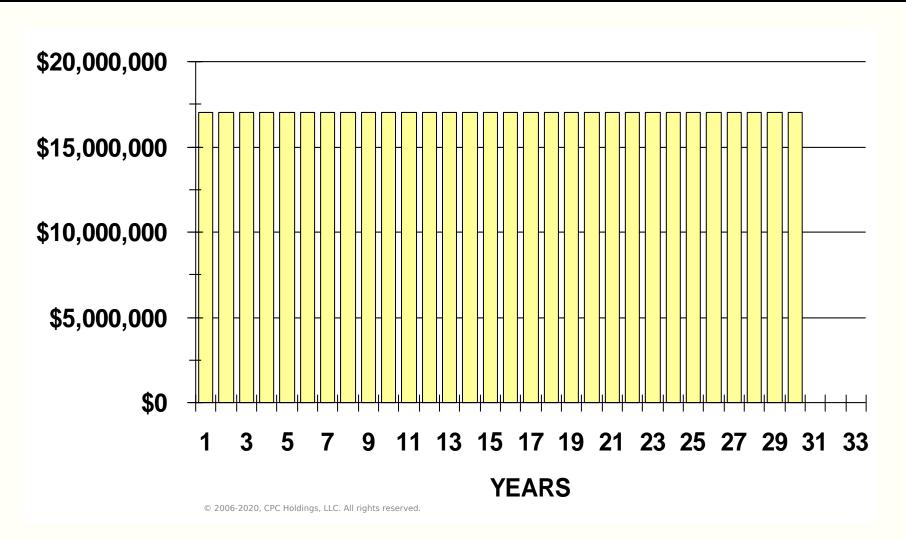
Pooled Income Fund Over Bond Financing





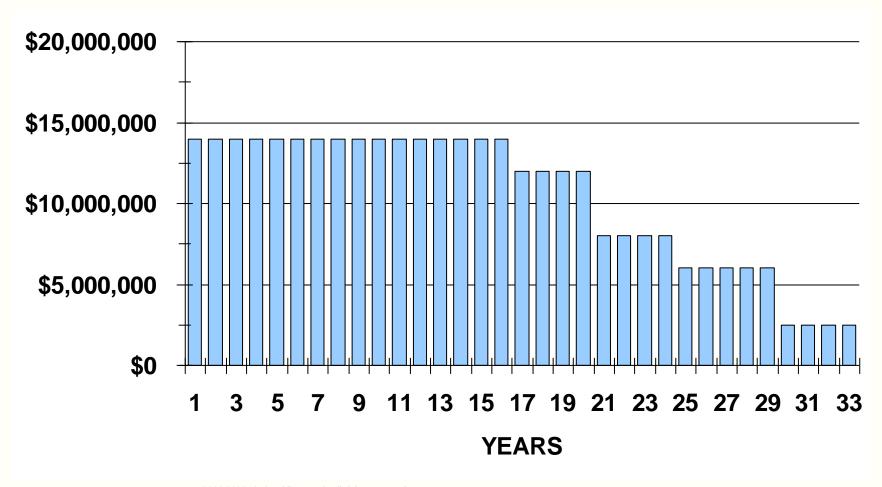
\$200,000,000 Bond Financing

30 Year Bond @ 7.5%



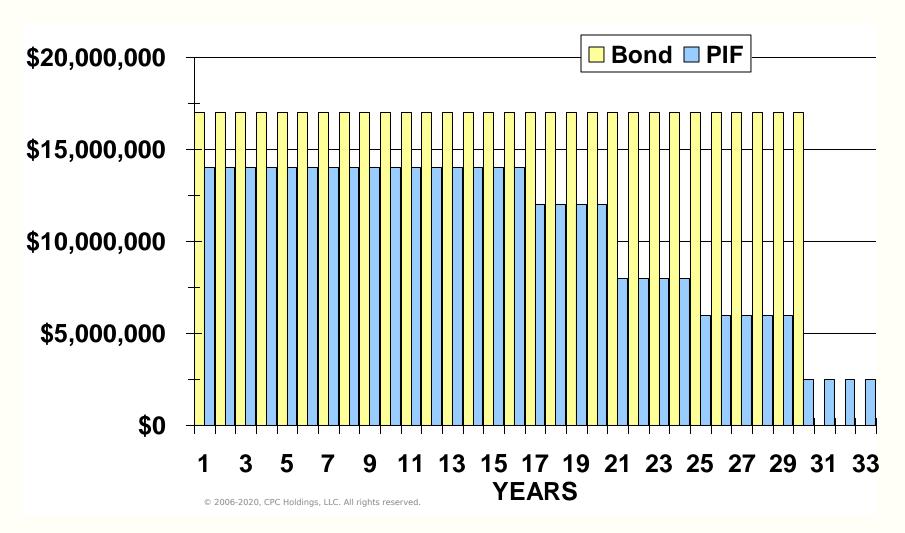


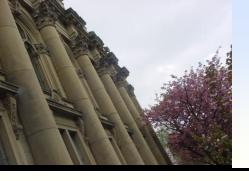
\$200,000,000 PIF Financing 33 Year PIF @ 6%





30 Year Bond @ 7.5% vs. 33 Year PIF @ 6%





Bond vs. Pooled Income Fund

Bond Financing:

Principal Amount

Less Cost @ 1.25%

Goal

\$202,531,646

(\$2,531,646)

\$200,000,000

Interest Rate

7.50%

Amortization Period:

10 Years

15 Years

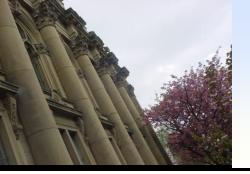
30 Years

Annual Debt

\$29,506,011

\$22,944,250

\$17,148,605



Bond vs. Pooled Income Fund

Pooled Income Fund:

Principal Amount:

Less Cost @ 3.00%

Goal

Interest (Lease) Rate

\$206,185,567

(\$6,185,567)

\$200,000,000

6.00%

200 Equal Investors

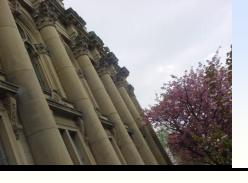
40 At Age 50 Life Expectancy = 33 Years

40 At Age 55 Life Expectancy = 29 Years

40 At Age 60 Life Expectancy = 24 Years

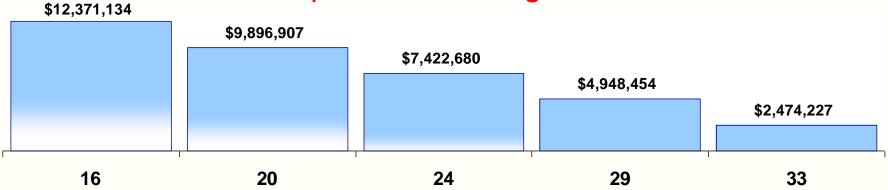
40 At Age 65 Life Expectancy = 20 Years

40 At Age 276@10, CPC Holding Life on Expectancy = 16 Years

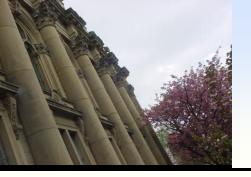


Bond vs. Pooled Income Fund

Graph of Rent Obligations



Present Valued At		6.00%	
\$2,474,227	For	16 Years \$ 22,618,161	
\$2,474,227	For	20 Years \$ 25,223,484	
\$2,474,227	For	24 Years \$ 27,174,351	
\$2,474,227	For	29 Years \$ 28,938,966	
\$2,474,227	For	33 Years \$ 29,956,506	



Bond vs. Pooled Income Fund

Bond Financing Cost:

\$202,531,646

Pooled Income Fund Cost:

\$133,911,467

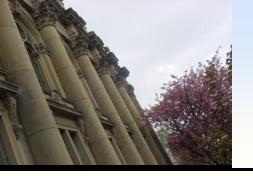
NET SAVINGS:

Pooled Income Fund Over Bond Financing





Benefits to the IRS



PROJECTION #1

(Net income earned from investments is SAVED)

Older Beneficiary DOB: 01/01/37 Date: 5/17/92

Younger Beneficiary DOB: 02/01/37

ASSUMPTIONS FOR JOINT BENEFICIARIES

#1 – Income Tax Rate	33.33%
#2 – Estate Tax Rate	50.00%
#3 – Investment Return (sell/reinvest)	7.00%
#4 – PIF Return	7.00%
#5 – Investment A/T Return	4.67%
#6 – Life Expectancy (yrs.)	34
#7 – Current Investment Return	2.50%

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PROJECTION #1

(Net income earned from investments is SAVED)

I. HOLD THE PROPERTY UNTIL DEATH

A. Fair Market Value

A. Fall Market Value

B. Annual Income (#7 x I.A)

C. Net Income A/T (1-#1 x I.B)

D. Future Values of I.C @ Death

E. Taxable Estate (I.D + I.A)

F. Estate Tax (#2 x I.E)

\$1,000,000

\$25,000

\$16,667

\$1,327,703

\$2,327,703

<u>(\$1,163,851)</u>

 ~ 200 Eq. (1.E - 1.F)

\$1,163,851



PROJECTION #1

(Net income earned from investments is SAVED)

```
II. SELL THE PROPERTY & REINVEST
```

```
A. Sale Price $1,000,000
```

B. Adjusted Price (\$100,000)

C. Taxable Gain (II.A – II.B) \$900,000

D. Income Tax (#1 x II.C) (\$300,000)

E. Net Proceeds (II.A – II.D) \$700,000

F. Annual Income (#3 x II.E) \$49,000

G. Net Income A/T (1-#1xII.F) \$32,667

H. Future Value of II.G @ Death \$2,602,271

I. Taxable Estate (II.E + II.H) \$3,302,271

J. Estate Tax (#2 x II.J) (\$1,651,136) (\$1,651,136)

NET TO HEIRS (II.I – II.J)

\$1,163,851

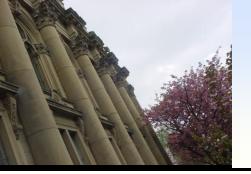


PROJECTION #1

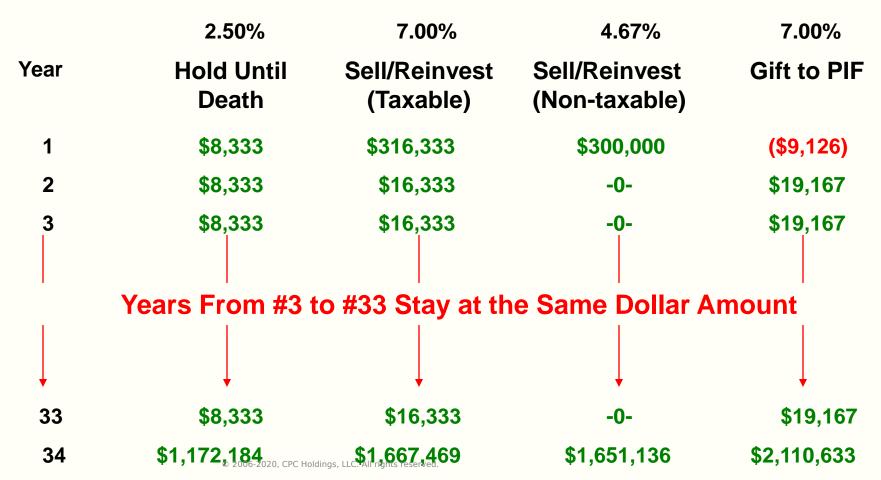
(Net income earned from investments is SAVED)

III. GIFT TO POOLED INCOME FUND

```
A. Amount of Gift to PIF
                                     $1,000,000
B. Income from PIF (#4 x III.A)
                                        $70,000
C. Depreciation (III.A / 80)
                                       ($12,500)
D. Taxable Income (III.B - III.C)
                                        $57,000
E. Income Tax (#1 x III.D)
                                       ($19,167)
F. Net Income to Spend (II.G)
                                           -0-
G. Net Income A/T (III.B-III.E-III.F)
                                        $50,833
H. Future Value of III.G @ Death
                                                 $4,049,385
I. Char. Inc. Tax Deduction
                                         8.488%
J. Char. Deduct. (III.A x III.J)
                                        $84,880
K. Tax Savings (III.J x #1)
                                        $28,293
L. Future Value of III.K @ Death
                                                   $133,547
M. Taxable Estate (III.H + III.L)
                                                             $4,182,932
N. Estate Tax (#2 x III.M)
                                                             ($2,091,466)
               NET TO HEIRS (III.M — III.N)
                                                                          $2.091.466
```

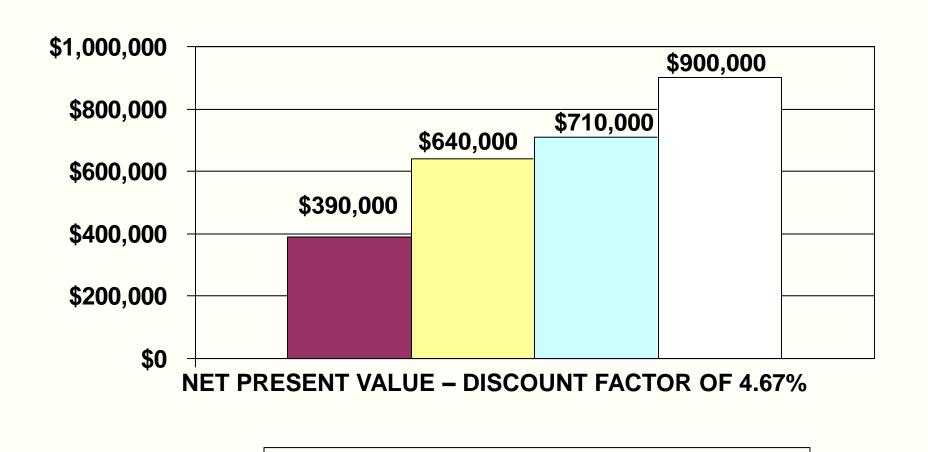


Taxes Paid to the Internal Revenue Service

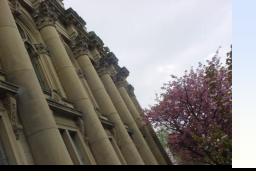




Taxes Paid to IRS The IRS Likes Planned Giving (or it should!)



■ Hold □ Sell/Nontaxable □ PIF □ Sell/Taxable



Pooled Income Fund (PIF)

Pooled Investment

Income Payment Based on the PIF's Rate of Return

For the Life of the Donor (and Spouse)

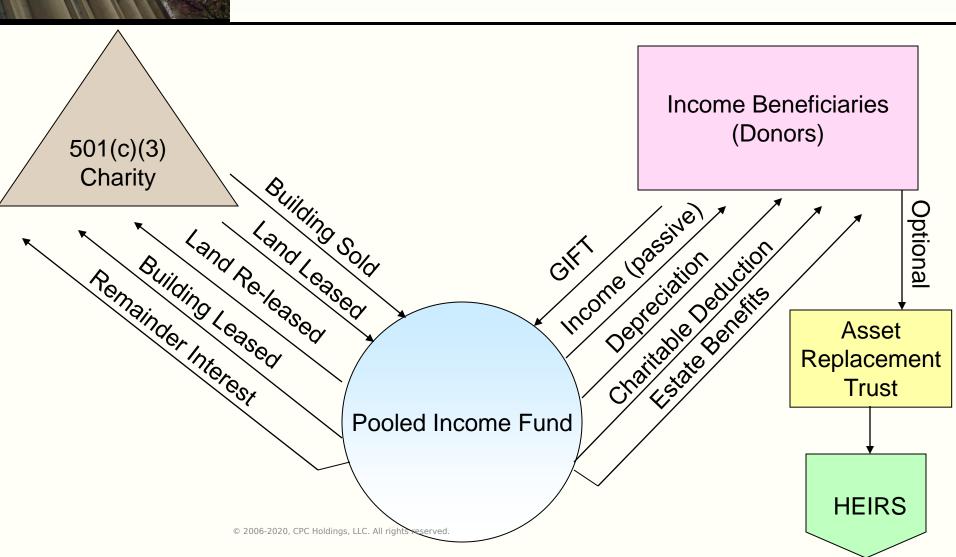
Maintained by the Charitable Remainderman

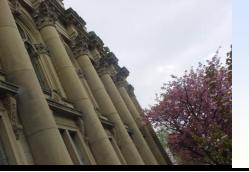


Benefits to the Donor



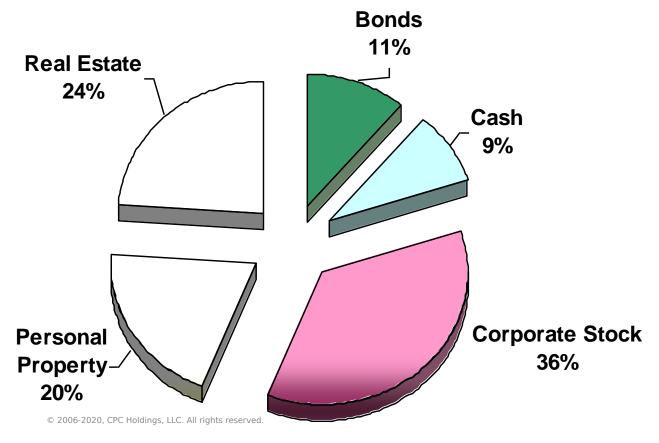
The Real Estate Pooled Income Fund





Portfolios of the Wealthy







Real Estate

Stocks & Bonds

...to
Your
Investments?

PC Holdings, LLC. All rights reserved.





PROJECTION #1

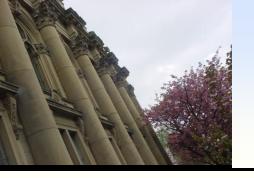
(Net income earned from investments is SAVED)

Older Beneficiary DOB: 01/01/37 Date: 5/17/92

Younger Beneficiary DOB: 02/01/37

ASSUMPTIONS FOR JOINT BENEFICIARIES

#1 – Income Tax Rate	33.33%
#2 – Estate Tax Rate	50.00%
#3 – Investment Return (sell/reinvest)	7.00%
#4 – PIF Return	7.00%
#5 – Investment A/T Return	4.67%
#6 – Life Expectancy (yrs.)	34
#7 – Current Investment Return © 2006-2020, CPC Holdings, LLC. All rights reserved.	2.50%



PROJECTION #1

(Net income earned from investments is SAVED)

I. HOLD THE PROPERTY UNTIL DEATH

A. Fair Market Value

B. Annual Income (#7 x I.A)

C. Net Income A/T (1-#1 x I.B)

D. Future Values of I.C @ Death

E. Taxable Estate (I.D + I.A)

F. Estate Tax (#2 x I.E)

\$1,000,000

\$25,000

\$16,667

\$1,327,703

\$2,327,703

<u>(\$1,163,851)</u>

NET TO HEIRS (1.E - 1.F)

\$1,163,851

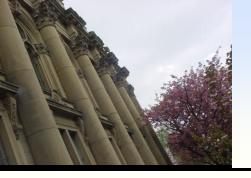
STOCK

WORTH \$1,000,000



BASIS \$100,000



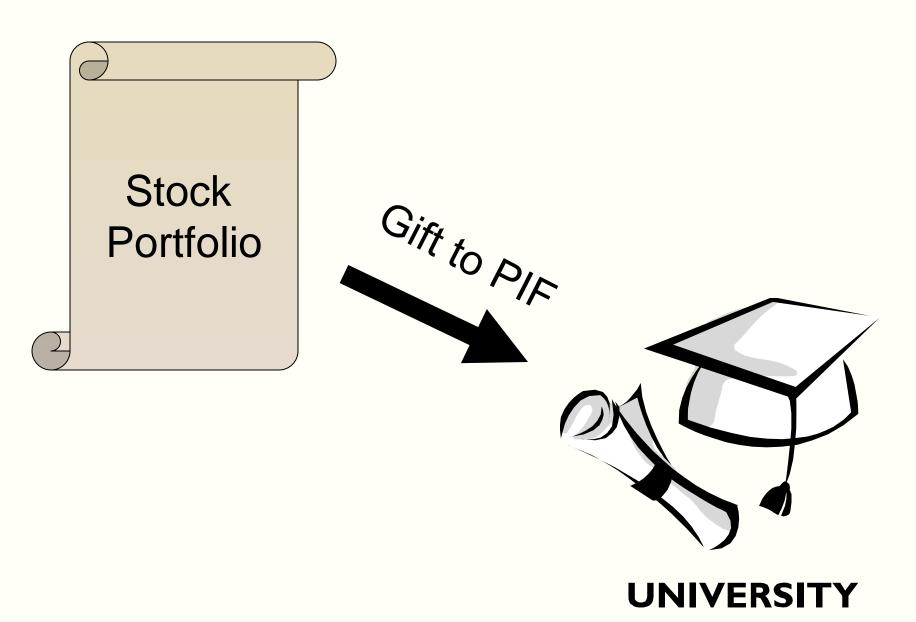


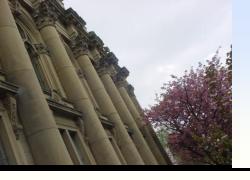
PROJECTION #1

(Net income earned from investments is SAVED)

```
II. SELL THE PROPERTY & REINVEST
```

```
A. Sale Price
                              $1,000,000
B. Adjusted Price
                               <u>($100,000)</u>
C. Taxable Gain (II.A – II.B)
                              $900,000
D. Income Tax (#1 x II.C)
                          ($300,000)
E. Net Proceeds (II.A – II.D) $700,000
F. Annual Income (#3 x II.E) $49,000
G. Net Income A/T (1-#1xII.F) $32,667
H. Future Value of II.G @ Death
                                         $2,602,271
I. Taxable Estate (II.E + II.H)
                                                $3,302,271
J. Estate Tax (#2 x II.J) ($1,651,136)
                                                <u>($1,651,136)</u>
                     NET TO HEIRS (II.I – II.J)
                                                        $1,163,851
```

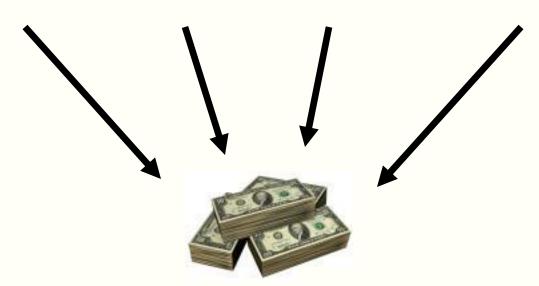


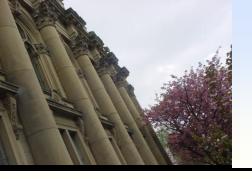


Advantages of Stepping Into a PIF

Depreciation Cash Income Tax Estate

Deduction Flow Deduction Benefits Flow





PROJECTION #1

(Net income earned from investments is SAVED)

III. GIFT TO POOLED INCOME FUND

A. Amount of Gift to PIF \$1,000,000
B. Income from PIF (#4 x III.A) \$70,000
C. Depreciation (III.A / 80) (\$12,500)
D. Taxable Income (III.B - III.C) \$57,000
E. Income Tax (#1 x III.D) (\$19,167)
F. Net Income to Spend (II.G) -0-

G. Net Income A/T (III.B-III.E-III.F) \$50,833

H. Future Value of III.G @ Death \$4,049,385

I. Char. Inc. Tax Deduction 8.488%
J. Char. Deduct. (III.A x III.J) \$84,880

K. Tax Savings (III.J x #1) \$28,293

L. Future Value of III.K @ Death \$133,547

M. Taxable Estate (III.H + III.L)

N. Estate Tax (#2 x III.M)

• 2NE27, CTCOdiHEIRSh(III.M - III.N)



\$4,182,932

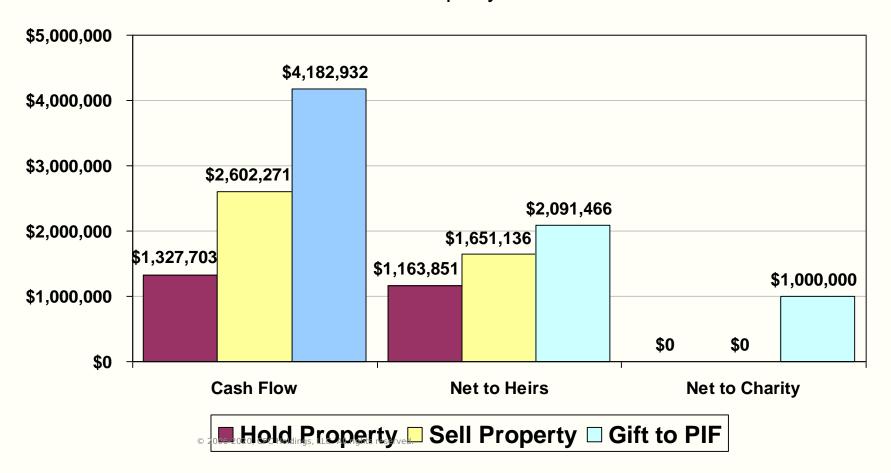
<u>(\$2,091,466)</u>

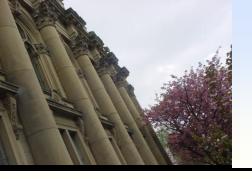
\$2,091,466



Comparison of Benefits

Projection #1 – Cash is Saved FMV of Property = \$1 Million





PROJECTION #1

(Net income earned from investments is SAVED)

IV	AD\	/AN	TAGES	SOF	PIF.
. v .	<i>,</i> , , ,	v / vi 4	1/10-	<i>.</i>	

A. Cash to Donor

B. Net to Heirs

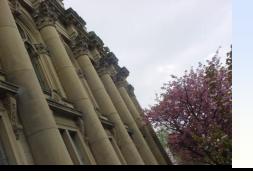
C. Gift to Charity

10, 110 ED 1110. 10, 0 E E E 1110	VS. HOL	DING:	VS.	SELLING
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\$2,855,230 \$1,580,661

\$927,615 \$440,330

\$1,000,000 \$1,000,000



PROJECTION #2

(Net income earned from investments is SPENT)

IV. ADVANTAGES OF PIF:

A. Cash to Donor

B. Net to Heirs

C. Gift to Charity

VS. HOLDING: VS. SELLING:

\$2,855,230

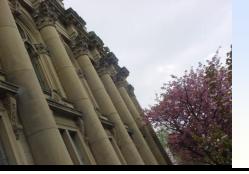
\$927,615

\$1,000,000

\$1,580,661

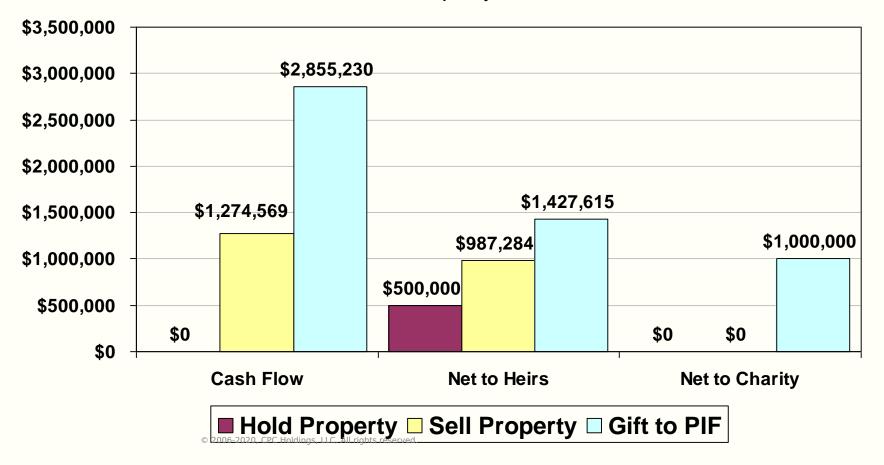
\$440,330

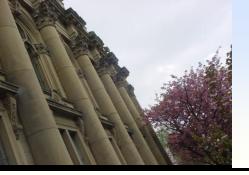
\$1,000,000



Comparison of Benefits

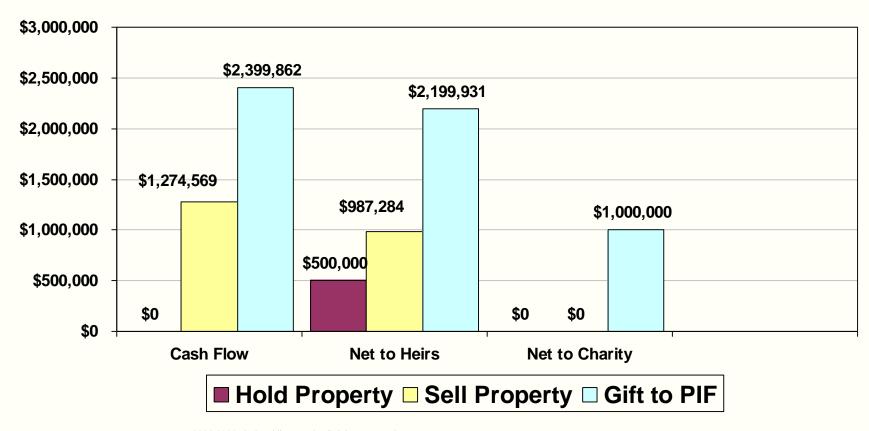
Projection #2 – Cash is Saved FMV of Property = \$1 Million

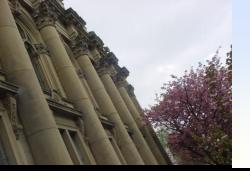




Comparison of Benefits

Projection #3 – Insurance is Purchased FMV of Property = \$1 Million





PROJECTION #3

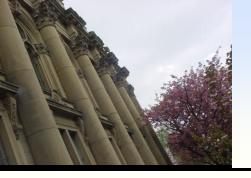
(Net income earned from investments is SPENT and INSURANCE IS PURCHASED)

Older Beneficiary DOB: 01/01/37 Date: 05/17/92

Younger Beneficiary DOB: 02/01/37

ASSUMPTIONS FOR JOINT BENEFICIARIES

#1 – Income Tax Rate	33.33%
#2 - Estate Tax Rate	50.00%
#3 - Investment Return (sell/reinvest)	7.00%
#4 – PIF Return	7.00%
#5 - Investment A/T Return	4.67%
#6 - Life Expectancy (yrs)	34
#7 - Current Investment Return	2.50%
#8 – Insurance Premiums per Year	\$12,295
#9 – Years Premium Paid	10
#10 - Face Amount of Insurance	\$1,000,000



PROJECTION #3

(Net income earned from investments is SPENT and INSURANCE IS PURCHASED)

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1 V -	\mathcal{L}	/ / \I N		I - C	\mathcal{O}		_

A. Cash to Donor

B. Net to Heirs

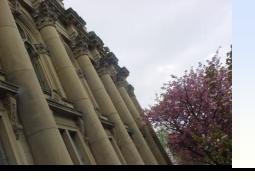
C. Gift to Charity

VS. HOLDING: V	S.	SELLING
----------------	----	----------------

\$2,399,862 \$1,125,293

\$1,699,931 \$1,212,647

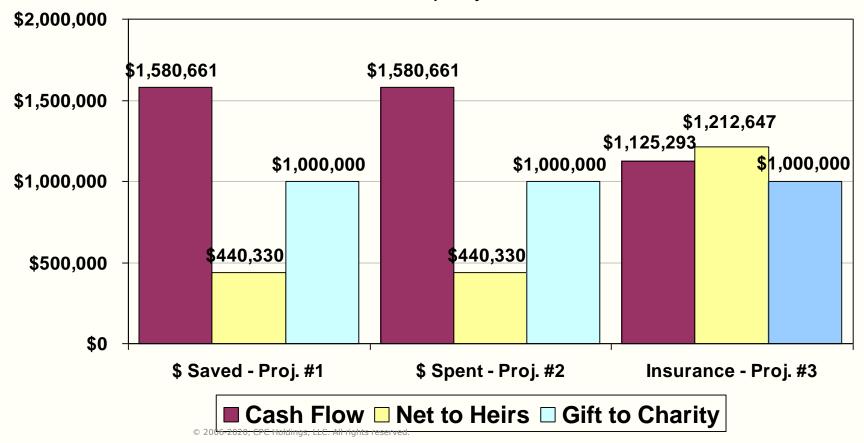
\$1,000,000 \$1,000,000

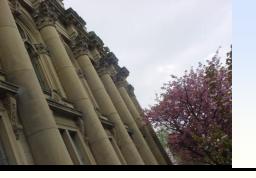


Sale of Property vs. Gift to Pooled Income Fund

Advantages of PIF over Holding

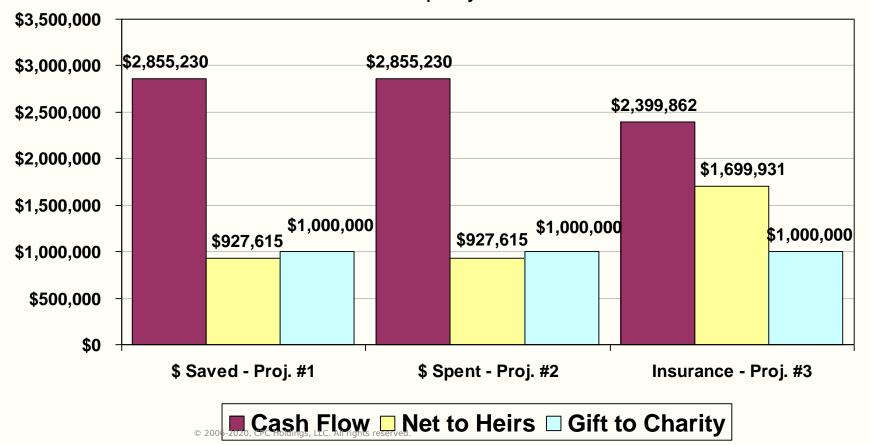
Projections 1, 2 & 3 FMV of Property = \$1 Million

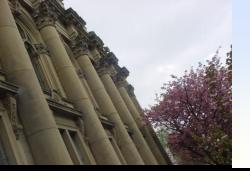




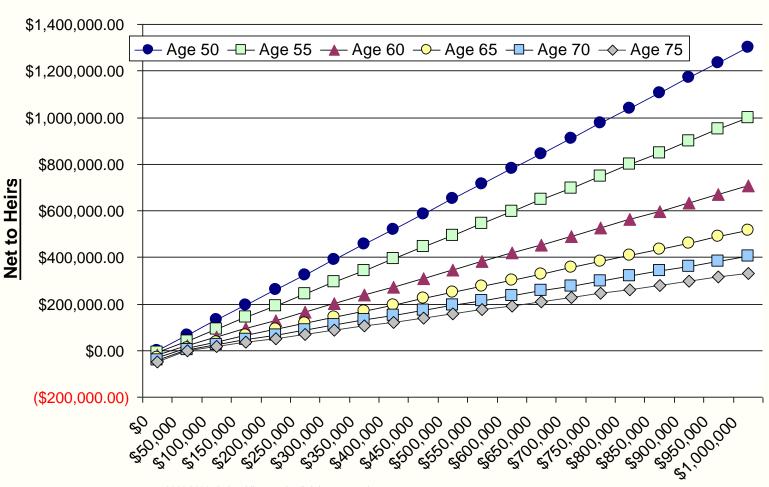
Advantages of PIF over Holding

Projections 1, 2 & 3 FMV of Property = \$1 Million





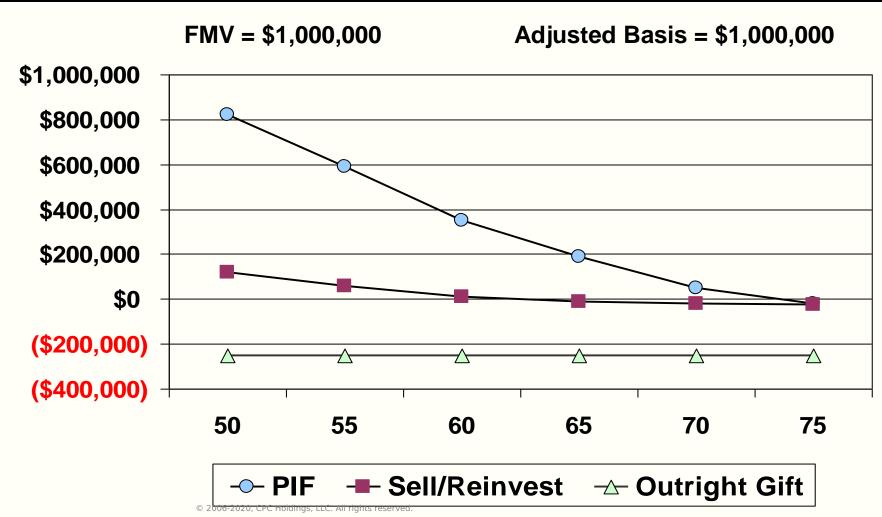
Sell & Reinvest Net Proceeds



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PIF vs. Sell/Reinvest vs. Outright Gift





PIF vs. Sell/Reinvest vs. Outright Gift

