

Split-Interest Trusts, Filing Year 2009

by Lisa Schreiber Rosenmerkel

Form 5227, the *Split-Interest Trust Information Return*, is filed by trusts with both charitable and noncharitable beneficiaries. A Form 5227 must be submitted for each calendar year in which a split-interest trust exists; it must be filed with the Internal Revenue Service (IRS) by April 15 of the year following the calendar year described in the return.¹ Because Form 5227 is an information return, it is used to disclose the financial activities of the trust, but not to calculate tax liability.

A split-interest trust can be created by a will or a trust instrument. The trust instrument specifies the term of the trust, designates the trustee(s) and beneficiaries, and provides parameters for managing assets and distributing income. The instrument usually specifies the contents of the trust. The individual who owns, and then transfers, the assets that make up the trust corpus is known as the grantor. The individuals and entities that receive income are known as beneficiaries.

A trustee is charged with holding, investing, and distributing the income and assets of the trust. A trustee may be an individual, a group of individuals, or an entity, such as a bank or charity. Each trustee must ensure that all transactions, including distributions, conform to the requirements of the trust document and to any applicable laws. Additionally, trustees must coordinate the preparation, verification, and submission of all required State and Federal tax forms.

In Filing Year 2009, 122,541 Forms 5227 were filed, primarily for Tax Year 2008 (Figure A).^{2,3} There are three distinct types of split-interest trusts: charitable remainder trusts, charitable lead trusts, and pooled income funds. As in prior years, charitable

remainder trusts were the most common 5227 filers, accounting for 114,500 returns in 2009. Under a charitable remainder trust (CRT) agreement, an income stream is distributed annually to one or more noncharitable beneficiaries of the trust for a defined period.^{4,5} At the conclusion of the period, the trust is dissolved, and the remaining assets are distributed to predetermined charitable beneficiaries.⁶ There are two types of charitable remainder trusts. Charitable remainder annuity trusts (CRATs) and charitable remainder unitrusts (CRUTs) are differentiated by the calculation of the noncharitable distribution amount. Charitable remainder annuity trusts annually distribute a fixed percentage, between 5 percent and 50 percent, of the *initial* fair market value of the property in the trust. Charitable remainder unitrusts distribute a fixed percentage of the fair market value of the trust property, *valued annually*. This percentage is called the “unitrust percentage” and must be between 5 percent and 50 percent.

Trustees of charitable lead trusts filed 6,626 returns in Filing Year 2009. Under a charitable lead trust (CLT) agreement, annual distributions are made to a predetermined charitable beneficiary. The amount of CLT distributions is not constrained by minimum or maximum payout restrictions. At the conclusion of the trust’s predetermined life, the remaining income and assets are distributed to the designated noncharitable beneficiary.

Pooled income funds are the least common type of split-interest trust, with 1,415 returns filed in 2009 (Figure A). Under a pooled income fund (PIF) arrangement, donors to a charitable organization contribute to a pool of donated assets and in return receive income payments for the remainder of the grantors’ lifetimes.⁷ The transfer of assets to the fund must be irrevocable, meaning the assets cannot be removed or replaced with other assets without consent of the beneficiary. The donee charity, commonly a large educational institution, is responsible for the

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¹ Split-interest trusts created before May 27, 1969, are exempt from the requirement to file a Form 5227, as long as no amounts have been transferred to the trust since May 27, 1969.

² A filing year includes all returns submitted to IRS processing between January 1 and December 31.

³ Figure A includes data for six charitable remainder unitrusts that otherwise distorted the analysis presented in this article. Data for these trusts are also included in the aggregate tables presented at the conclusion of this article, as well as the online versions. All other figures and calculations in this article exclude data for these six trusts.

⁴ The period may be either a fixed duration, statutorily limited to 20 years, or the lifetime of a noncharitable beneficiary. For more information on the allowable duration of charitable remainder trusts, see Internal Revenue Code section 664(d)(1)(A) and 664(d)(2)(A).

⁵ In order to qualify, the individual or individuals must be the donor, the donor’s spouse, a linear ancestor of a noncharitable beneficiary, or the spouse of a linear ancestor of a noncharitable beneficiary. For more information, see Treasury Regulations 1.1170A-6(c)(2)(i).

⁶ The qualifications for a “charitable beneficiary” are detailed in Internal Revenue Code section 170(c).

⁷ Pooled income funds are further discussed under Internal Revenue Code section 642(c)(5).

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Figure A

Split-Interest Trusts, by Type of Trust, Filing Years 2008 and 2009

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

Item	All			Charitable remainder trusts		
	2008	2009	Percent change	2008	2009	Percent change
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	123,498	122,541	-0.8	115,489	114,500	-0.9
Net asset value, end-of-year [1]	128,080,488	123,792,276	-3.3	106,974,054	104,200,449	-2.6
Book value of assets, end-of-year [2]	130,148,699	125,680,010	-3.4	108,473,185	105,577,412	-2.7
Book value of liabilities, end-of-year [2]	2,068,211	1,887,735	-8.7	1,499,131	1,376,963	-8.1

Item	Charitable lead trusts			Pooled income funds		
	2008	2009	Percent change	2008	2009	Percent change
	(7)	(8)	(9)	(10)	(11)	(12)
Number of returns	6,521	6,626	1.6	1,488	1,415	-4.9
Net asset value, end-of-year [1]	19,648,472	18,274,043	-7.0	1,457,962	1,317,783	-9.6
Book value of assets, end-of-year [2]	20,024,009	18,633,726	-6.9	1,651,505	1,468,871	-11.1
Book value of liabilities, end-of-year [2]	375,537	359,683	-4.2	193,543	151,088	-21.9

[1] Calculated as the end-of-year book value of assets (Form 5227, Part IV, line 50, column (b)) minus the end-of-year book value of liabilities (line 56, column (b)).

[2] Reported on Form 5227, Part IV, column (b).

NOTE: Figure A includes data for six charitable remainder unitrusts that otherwise distorted the analysis presented in this article. Data for these trusts are also included in the aggregate tables presented at the conclusion of this article, as well as on SOIs Tax Stats web site. All other figures and calculations in this article exclude data for these six trusts. Detail may not add to totals due to rounding.

maintenance of the fund, including investing assets and making distributions to beneficiaries. Each year, grantors receive a distribution from the fund based on the ratio of their contributions to the value of the investment pool and the return on the fund assets for that year. At the time of the donor's death, the charity receives the grantor's prorated share of the value of the PIF.

Filing Information

In 2009, the majority of returns were filed for ongoing trusts, in neither the first nor last year of existence. Ongoing trusts accounted for 94.1 percent of all Forms 5227 filed in 2009. Just 2.3 percent of the population comprised initial returns, which were filed for newly created trusts. Final returns were slightly more common; in 2009, preparers for terminating trusts filed 4,464 returns, or 3.6 percent of the total population. Of the three types of SITs, charitable lead trusts were the most likely to file both initial and final returns, with returns for ongoing trusts making up only 86.4 percent of the CLTs filed.

The average lifetime of a terminating trust in Filing Year 2009 was approximately 15 years. Terminating pooled income funds had the longest average

lifetime of all the SIT types, slightly more than 21 years. This extended lifetime could be explained by the institutional structure of PIFs, in which a single charity oversees the assets of multiple donors. Charitable lead trusts terminating in 2009 had an average lifetime of 16 years. Charitable remainder trusts usually have shorter lifetimes given their temporary nature. Charitable remainder unitrusts terminating in Filing Year 2009 had an average lifetime of 15 years. Charitable remainder annuity trusts had the shortest average lifetime, approximately 13 years.

Paid preparers completed 76.8 percent of returns filed in 2009 (Figure B). Of those returns that did not indicate a paid preparer, 89.0 percent reported institutions, such as banks or charities, as the trustee. When entities such as these act as trustee, it is likely that the return was professionally prepared, even if a paid preparer did not sign the return. For example, while paid preparers completed only 55.2 percent of the returns filed for pooled income funds, institutional trustees were reported for 95.0 percent of the PIF returns that did not indicate a paid preparer. Returns for CLTs were most likely to report being completed by a paid preparer. In 2009, only 16.6 percent of returns filed for CLTs did not utilize a paid preparer.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Income and Deductions

In total, split-interest trust filers reported \$12.3 billion in gross income, defined as the sum of all income from any source prior to deductions (Figure C). Charitable remainder unitrusts, which represented the majority of returns filed, also accounted for the highest amount of gross income, \$9.1 billion. However, returns filed for charitable lead trusts reported the highest average gross income per return. The 6,376 CLT returns reported gross income of \$2.4 billion, or approximately \$374,000 per return. Charitable remainder annuity trust preparers reported the lowest average gross income per return, approximately \$36,000.

Charitable remainder trusts that incurred any unrelated business taxable income were required to file Form 4720, *Return of Certain Excise Taxes Under Chapters 41 and 42 of the Internal Revenue Code*.⁸

In Filing Year 2009, filers of 147 charitable remainder trust returns reported unrelated business income (UBI) on Form 5227. Nearly 98 percent of those reporting UBI were CRUTs.

Trust income is divided into three income categories: ordinary income, capital gains, and nontaxable income. Income reported for all trust types fell between the 2008 and 2009. Ordinary income made up the majority of trust income for all trust types (Figure D). This is primarily the result of a sharp decline in capital gains. Total capital gains reported in 2009 was negative for all trust types. While long-term capital gains were positive for most trust types, short-term capital gains were negative for each trust type. Dividends and business income made up the largest portion of ordinary income for all trust types, while farm income was the smallest component of ordinary income. Interest earned on bonds issued by

Figure B

Utilization of Paid Preparers and Distribution of Trustee Type, by Type of Trust, Filing Year 2009

[All figures are estimates based on samples]

Preparer status, type of trustee	All	Charitable remainder annuity trusts	Charitable remainder unitrusts	Charitable lead trusts	Pooled income funds
	(1)	(2)	(3)	(4)	(5)
All returns	122,535	18,572	95,922	6,626	1,415
Paid preparer [1]	94,120	12,230	75,584	5,524	781
Unpaid preparer	28,415	6,342	20,338	1,101	634
Institutional trustee	25,295	5,874	17,898	920	602
Non-institutional trustee	3,120	468	2,440	181	32

[1] The presence of a paid preparer is indicated on page 6 of Form 5227.

Figure C

Gross Income, by Type of Trust, Filing Year 2009

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

Item	All	Charitable remainder annuity trusts	Charitable remainder unitrusts	Charitable lead trusts	Pooled income funds
	(1)	(2)	(3)	(4)	(5)
Number of returns	122,535	18,572	95,922	6,626	1,415
Number of returns with gross income	117,790	18,197	91,844	6,376	1,373
Amount of gross income reported	12,280,496	666,281	9,144,921	2,382,614	86,681

NOTE: Detail may not add to totals due to rounding.

⁸ Any income that a charitable remainder trust received that is the result of a trade or business that is not substantially related to its exempt purpose is subject to tax. One example of unrelated business income is debt financed income, which includes dividends from stock purchased through a margin account. For more information, see IRS Publication 598, *Tax on Unrelated Business Income of Exempt Organizations*.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Figure D

Income and Deductions, by Type of Trust, Filing Year 2009

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

Item	Charitable remainder annuity trusts	Charitable remainder unitrusts	Charitable lead trusts	Pooled income funds
	(1)	(2)	(3)	(4)
Number of returns	18,572	95,922	6,626	1,415
Total net income [1]	197,019	3,125,935	N/A	N/A
Net ordinary income [2]	210,474	3,650,181	N/A	N/A
Total ordinary income	271,530	4,374,407	1,203,112	69,855
Interest income	85,940	809,451	240,583	23,479
Dividends and business income (loss)	162,124	1,780,220	936,970	45,929
Rents, royalties, partnerships, other estates and trusts, etc.	14,091	182,803	41,706	* 333
Farm income (loss)	* 97	* 1	* 53	0
Ordinary gain (loss)	100	9,839	-46,449	0
Other income	9,179	1,592,092	30,249	114
Deductions allocable to ordinary income [3]	61,056	724,226	N/A	N/A
Net capital gains (losses) [4]	-45,938	-632,839	N/A	N/A
Total capital gains (losses)	-43,825	-494,217	-46,461	-29,589
Total short-term capital gains (losses)	-174,958	-1,819,821	-533,456	-15,051
Total long-term capital gains (losses)	131,133	1,325,604	486,995	-14,537
Deductions allocable to capital gains [3]	2,112	138,621	N/A	N/A
Net nontaxable income [5]	32,482	108,593	N/A	N/A
Total nontaxable income	37,187	134,981	39,467	* 1
Tax-exempt interest	35,380	110,573	38,517	* 1
Other nontaxable income	1,807	24,408	950	0
Deductions allocable to nontaxable income [3]	4,705	26,388	N/A	N/A
Total deductions [6]	68,347	907,719	274,425	9,344
Interest	1,049	49,586	36,593	* 71
Taxes	1,227	13,707	38,006	41
Trustee fees	38,616	230,316	35,833	3,761
Attorney, accountant, and return preparer fees	8,029	66,680	13,578	231
Other allowable deductions	19,426	547,430	150,415	5,240

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

N/A: Value not available. Items related to net income and deductions are not reported for CLTs or PIFs.

[1] Calculated as the sum of "net ordinary income" (Form 5227, Part I, Section E, line 24b), "net capital gains (losses)" (line 25b), and "net nontaxable income" (line 26b).

[2] Reported on Form 5227, Part I, Section E, line 24b.

[3] Included in "total deductions" amount given on Form 5227, Part I, Section D, line 22.

[4] Reported on Form 5227, Part I, Section E, line 25b.

[5] Reported on Form 5227, Part I, Section E, line 26b.

[6] Reported on Form 5227, Part I, Section D, line 22. Deductions shown are for informational purposes only and are included in the deduction items above for CRATs and CRUTs.

State and local governments represented the majority of nontaxable income.

Total deductions between from 2008 and 2009, as well. Charitable remainder annuity trust filers reported trustee's fees as the largest deduction (Figure D). Deductions for interest and taxes are the smallest deductions reported for charitable remainder trusts and pooled income funds. Attorney, accountant, and return preparer fees are the smallest deductions reported for charitable lead trusts.

Balance Sheet

Overall, the total end-of-year assets, which include cash, receivables, and investments, reported for split-interest trusts declined by 11.7 percent between 2008 and 2009 (Figure E). Total investments followed a similar trend, declining by 13.5 percent. Corporate stock remained the largest investment category; however, the reported amounts declined 10.1 percent between 2008 and 2009. Other investments declined the most, 19.9 percent, from \$42.2 billion to \$33.8

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

billion.⁹ The only investment category that did not notably decline was land, buildings, and equipment, remaining at \$1.2 billion.

The value of land, buildings, and equipment for charitable remainder annuity trusts and charitable remainder unitrusts increased 13.4 percent and 4.0 percent, respectively. Charitable remainder unitrusts reported the greatest decline in total investment values, falling 14.8 percent from 2008. Total investments reported for charitable lead trusts declined only 8.4 percent. Unlike other filers, trustees of pooled income funds reported increases in both U.S. and State government obligations and corporate stock. Overall, liabilities declined 9.5 percent from \$2.1 billion in 2008 to \$1.9 billion in 2009.

Charitable Distributions

Trustees for all split-interest trusts must report any trust distributions of principal or income for charitable purposes on Form 5227. In 2009, distributions

of principal were made more frequently and in higher dollar amounts than distributions of income. Some 17,079 distributions of principal totaling \$1.5 billion were made to charities in Filing Year 2009 (Figure F). This is a decline of more than 22 percent from the values reported in 2008. Charitable lead trusts continued to make the highest number of distributions of principal, largely due to the annual charitable distributions required by their trust structures. However, charitable remainder unitrusts distributed the largest dollar amount of principal distributions, \$931.3 million. This large amount is primarily the result of the final distributions made by charitable remainder trusts at the end of their lifetimes. Final distributions include all assets remaining in the trust and totaled \$762.4 million in Filing Year 2009. Education-related charities received the highest number of distributions of principal, some 4,017 or 23.5 percent of total distributions; however, charities related to public or societal benefit received the largest amount

Figure E

Investment Allocations, by Type of Trust, Filing Years 2008 and 2009

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

Item	All		Charitable remainder annuity trusts		Charitable remainder unitrusts		Charitable lead trusts		Pooled income funds	
	2008 (1)	2009 (2)	2008 (3)	2009 (4)	2008 (5)	2009 (6)	2008 (7)	2009 (8)	2008 (9)	2009 (10)
Total book value of assets at end-of-year	130,148,699	114,879,772	9,089,552	8,232,133	99,383,633	86,545,042	20,024,009	18,633,726	1,651,505	1,468,871
Total investments	114,872,033	99,331,100	7,781,648	6,977,811	88,920,579	75,744,415	16,648,955	15,244,402	1,520,851	1,364,472
U.S. and State government obligations [1]	7,198,512	6,409,166	1,018,574	1,006,956	5,405,613	4,640,086	662,199	619,023	112,126	143,101
Corporate stock [2]	54,685,522	49,148,928	4,250,440	3,701,494	42,978,885	38,798,487	7,115,414	6,286,435	340,783	362,512
Corporate bonds [3]	9,562,480	8,760,517	1,075,405	933,412	7,350,600	6,730,154	681,189	687,883	455,286	409,068
Land, buildings, and equipment [4]	1,230,744	1,233,968	95,898	108,707	879,894	914,942	192,156	182,174	* 62,796	* 28,145
Other investments [5]	42,194,774	33,778,521	1,341,331	1,227,241	32,305,586	24,660,746	7,997,997	7,468,887	549,860	421,647
Total book value of liabilities	2,068,212	1,887,734	157,979	92,360	1,341,153	1,284,603	375,537	359,683	193,543	151,088

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

[1] Reported on Form 5227, Part IV, line 45a, column (b).

[2] Reported on Form 5227, Part IV, line 45b, column (b).

[3] Reported on Form 5227, Part IV, line 45c, column (b).

[4] Reported on Form 5227, Part IV, line 46, column (b).

[5] Reported on Form 5227, Part IV, line 47, column (b).

NOTE: Detail may not add to totals due to rounding and taxpayer reporting discrepancies.

⁹ Other investments includes all investment holdings that could not be classified as a government obligation, corporate stock, corporate bonds, or land, buildings, and equipment. Examples include obligations issued by foreign governments and shares of hedge funds.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Figure F

Charitable Distributions of Principal, by Type of Trust and Charity Type, Filing Year 2009

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

Charity type	All		Charitable remainder annuity trusts		Charitable remainder unitrusts		Charitable lead trusts		Pooled income funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total	17,079	1,509,314	2,019	175,708	6,972	931,322	7,500	358,217	588	44,067
Arts, culture, and humanities	1,373	58,846	328	35,143	200	12,767	830	10,635	* 14	* 301
Education	4,017	455,612	678	89,489	1,869	270,163	1,232	71,511	239	24,449
Environment, animals	562	28,518	* 84	* 9,897	212	12,760	229	2,994	37	2,867
Health	2,104	222,858	179	8,306	806	183,676	1,087	29,894	* 32	* 983
Human services	3,118	130,759	270	10,552	1,180	72,323	1,619	42,725	49	5,159
International, foreign affairs	187	1,017	* 16	* 74	* 4	* 112	165	442	* 2	* 388
Public, societal benefit	2,539	463,047	138	10,101	971	278,479	1,409	167,581	* 20	* 6,887
Religion related	2,724	127,581	293	11,709	1,600	97,830	641	15,089	191	2,954
Mutual membership benefit organizations	* 64	* 31	0	0	* 60	* 12	* 4	* 20	0	0
Other	389	21,044	* 33	* 437	* 68	* 3,201	284	17,326	* 4	* 80

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

NOTES: "Number" shown in the heading for columns 1, 3, 5, etc. refers to the number of unique distributions. Detail may not add to totals because of rounding.

of principal distributions, some \$463.0 million or 30.7 percent of the total.

Distributions of income to charity were less frequent and smaller in amount than those derived from principal. In total, 13,827 distributions of income were made to charitable beneficiaries totaling \$1.0 billion (Figure G). As would be expected given their structures, charitable lead trusts dominated both the number and amount of charitable distributions of income, comprising 74.8 percent and 83.8 percent, respectively. As with principal distributions, education-oriented charities received the highest number of distributions of income from split-interest trusts overall, while charities organized for public or societal benefit received the largest amount of income distributions.

Noncharitable Distributions

Noncharitable distribution amounts of charitable remainder unitrusts are based on a fixed percentage of the fair market value of the trust property, *valued annually*. This percentage is called the "unitrust percentage" and must be between 5 percent and 50 percent. The majority, 86.4 percent, of 2009 filings for CRUTs reported unitrust percentages between 5 and

10 percent (Figure H). Less than 1 percent of filings reported unitrust percentages greater than 20 percent.

In Filing Year 2009, the majority of all CRUT trustees reported calculating noncharitable distributions using the standard structure. The standard structure requires them to distribute the unitrust amount, calculated as the unitrust percentage multiplied by the net fair market value of assets, to beneficiaries (Figure I). This ensures the most stable payment for beneficiaries; however, in years of poor investment performance, the trustee may have to liquidate trust assets to make the payment. In addition to the standard charitable remainder unitrust structure, two common variants allow for added flexibility of noncharitable distributions. The net income charitable remainder unitrust (NI-CRUT) variant permits the trustee to distribute only the amount of trust income earned in that year, when that amount is less than the distribution that would otherwise be required.¹⁰ By allowing the trustee to limit distributions in years when the trust's income is low, depletion of the trust corpus can be avoided. Only 4.8 percent of CRUTs were identified as NI-CRUTs. The net income with makeup charitable remainder unitrust (NIM-CRUT) variant works like a NI-CRUT,

¹⁰ For more information regarding net income charitable remainder unitrusts, see Internal Revenue Code section 664(d)(3)(A).

Figure G

Charitable Distributions of Income, by Type of Trust and Charity Type, Filing Year 2009

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

Charity type	All		Charitable remainder annuity trusts		Charitable remainder unitrusts		Charitable lead trusts		Pooled income funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total	13,827	1,030,234	871	13,426	2,357	151,784	10,348	863,696	251	1,328
Arts, culture, and humanities	1,591	32,798	232	1,071	156	14,069	1,192	17,656	* 11	* 2
Education	3,062	113,779	211	4,884	583	24,576	2,152	83,391	116	928
Environment, animals	797	13,673	* 21	* 47	* 52	* 98	709	13,520	* 14	* 7
Health	1,705	69,722	132	1,786	136	30,705	1,385	37,182	* 53	* 51
Human services	2,144	50,085	133	2,158	433	23,068	1,550	24,849	28	10
International, foreign affairs	146	2,171	* 3	* 69	* 3	* 5	139	2,093	* 2	* 5
Public, societal benefit	2,001	685,148	65	2,849	268	39,956	1,656	642,341	* 12	* 1
Religion related	1,853	39,353	70	553	662	17,808	1,107	20,669	* 13	* 324
Mutual membership benefit organizations	* 25	* 65	* 1	* 1	* 20	* 63	* 4	* 1	0	0
Other	503	23,440	* 4	* 8	* 44	* 1,438	453	21,995	* 2	[1]

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

[1] Amount less than \$500.

NOTES: "Number" shown in the heading for columns 1, 3, 5, etc. refers to the number of unique distributions. Detail may not add to totals because of rounding.

in that the trustee is allowed to distribute the lesser of the trust income or the required percentage of fair market value.¹¹ However, the reductions in required distributions accumulate, and the trustee must make up for previous distribution deficiencies when trust

income permits. Approximately 17.3 percent of CRUTs were identified as NIM-CRUTs. CRUTs with \$3 million or more in end-of-year book value assets were more likely than those with fewer assets to be NIM-CRUTs.

The *Current Distributions Schedule* on Schedule A of Form 5227 details current-year noncharitable distributions made by trustees of both CRATs and CRUTs. Overall, the amount of noncharitable distributions declined only slightly between 2008 and 2009, likely the result of the fixed distributions required by many charitable remainder trusts agreements. As in 2008, long-term capital gains dominated the distributions for both CRATs and CRUTs in 2009 (Figure J). Ordinary income, primarily interest and dividends, was the second most common distribution. Nontaxable income comprised the smallest portion of all distributions. Distributions from corpus comprised a higher percentage of total distributions for CRATs than it did for CRUTs. This may be the result of the strict distribution requirements that typify CRAT agreements. Since the noncharitable distribution amount is fixed throughout the trust's life, trustees may find it necessary to liquidate assets in the corpus to meet the requirement.

Figure H

Charitable Remainder Unitrusts: Reported Unitrust Percentage, Filing Year 2009

[All figures are estimates based on samples]

Unitrust percentage	Number of returns	Percent of total
All returns [1]	95,922	100.0
5 percent, under 10 percent	82,870	86.4
5 percent under 6 percent	21,316	22.2
6 percent under 7 percent	18,390	19.2
7 percent under 8 percent	19,464	20.3
8 percent under 9 percent	18,749	19.5
9 percent under 10 percent	4,951	5.2
10 percent under 20 percent	12,416	12.9
20 percent under 35 percent	502	0.5
35 percent to 50 percent	133	0.1

[1] Includes 1,742 returns for which an invalid unitrust percentage was reported and efforts made to correct the unitrust percentage were not successful.

NOTES: Detail may not add to totals due to rounding.

¹¹ For more information regarding net income with makeup charitable remainder unitrusts, see Internal Revenue Code section 664(d)(3)(B).

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Asset Donation

The *Assets and Donor Information* section of Schedule A, Form 5227, details both initial and additional asset contributions to the trust, as well as the date and source of the contribution. Some 5.0 percent of all split-interest trust filers reported asset contributions of some kind (Figure K). Of the 6,133 returns that reported asset contributions, 48.8 percent were initial returns. These initial returns also reported 82.3 percent of the total value of all contributions. Stocks composed 29.6 percent of overall contributions by value. Bonds were by far the least common contribution, making up only 1.5 percent of the total. Pooled income fund trustees were the most likely of any SIT type to report contributions. This may be explained by the structure of a pooled income fund, in which multiple donors join the fund over its lifetime, contributing assets as they join.

Summary

In 2009, 122,535 *Split-Interest Trust Information Returns* (Form 5227) were filed for charitable remainder trusts, charitable lead trusts, and pooled income funds. In total, split-interest trust filers reported \$12.3 billion in gross income and \$115.0 billion in end-of-year assets. Trustees reported approximately \$2.5 billion in charitable distributions and \$6.6 billion in noncharitable distributions. Split-interest

trusts received more than \$4.2 billion in asset contributions throughout the year.

Data Sources and Limitations

The data presented in this article were collected from a sample of Forms 5227, *Split-Interest Trust Information Returns*, selected during Filing Year 2009. A filing year includes returns received by IRS for processing between January 1 and December 31 of a given year and primarily comprises returns for the tax year immediately prior. However, it may include late-filed returns for numerous other tax years. For Filing Year 2009, approximately 97.8 percent of returns included in the sample were for Tax Year 2008, while Tax Year 2007 returns comprised 1.7 percent of the sampled returns. Partial year returns, for either initial or final reporting periods, were included in the SOI sample. All returns included in the sample were computer-designated at the IRS Ogden Submission Processing Center after posting to the IRS Master File.

For Filing Year 2009, a sample of 12,262 returns was drawn from an estimated population of 123,198. The sample size excluded returns that were selected for the sample but later rejected. Returns could be rejected if they were not one of the four types of trusts included in the study or if no money amounts were reported. The sample was stratified by the type of the trust (charitable remainder annuity trust, charitable remainder unitrust, charitable lead trust,

Figure I

Charitable Remainder Unitrust (CRUT) Types, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

CRUT type	All		Size of end-of-year book value of total assets					
	Number of returns	Percent of total	Under \$500,000 [1]		\$500,000 under \$3 million		\$3 million or more	
			Number of returns	Percent of total	Number of returns	Percent of total	Number of returns	Percent of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All CRUTs	95,922	100.0	66,548	100.0	25,671	100.0	3,702	100.0
Standard CRUT	74,689	77.9	52,108	78.3	20,011	78.0	2,570	69.4
Net income CRUT	4,617	4.8	3,443	5.2	1,041	4.1	133	3.6
Net income with makeup CRUT	16,616	17.3	10,997	16.5	4,619	18.0	999	27.0

[1] Includes returns that did not report end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero.

Often, these zero amounts are explained by trusts filing a final return.

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Figure J

Noncharitable Distributions, by Charitable Remainder Trust Type, Filing Year 2009

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

Item	All charitable remainder trusts		Charitable remainder annuity trusts		Charitable remainder unitrusts	
	Number or amount	Percent of total	Number or amount	Percent of total	Number or amount	Percent of total
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	114,494	N/A	18,572	N/A	95,922	N/A
Total noncharitable distributions [1]	6,568,505	100.0	734,959	100.0	5,833,546	100.0
Ordinary income [2]	2,238,357	34.1	205,613	28.0	2,032,745	34.8
Short-term capital gains [3]	139,283	2.1	5,866	0.8	133,417	2.3
Long-term capital gains [4]	3,430,176	52.2	317,054	43.1	3,113,122	53.4
Nontaxable income [5]	88,574	1.3	31,093	4.2	57,481	1.0
Corpus [6]	672,114	10.2	175,332	23.9	496,782	8.5

[1] May include distributions made after December 31 of the tax year and therefore may not be reflected on the accumulation schedule.

[2] Reported on Form 5227, Schedule A, Part II-A, column (d).

[3] Reported on Form 5227, Schedule A, Part II-A, column (e).

[4] Reported on Form 5227, Schedule A, Part II-A, column (f).

[5] Reported on Form 5227, Schedule A, Part II-A, column (g).

[6] Reported on Form 5227, Schedule A, Part II-A, column (h).

NOTE: Detail may not add to totals due to rounding.

Figure K

Asset Contributions, by Type of Trust and Asset Type, Filing Year 2009

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

Item	All	Charitable remainder annuity trusts	Charitable remainder unitrusts	Charitable lead trusts	Pooled income funds
	(1)	(2)	(3)	(4)	(5)
Number of returns	122,535	18,572	95,922	6,626	1,415
Number of trusts with asset contributions [1]	6,133	542	4,773	592	226
Total asset contributions	4,206,011	320,551	2,526,499	1,352,121	6,841
Cash and money market accounts	1,199,329	89,940	471,234	635,980	2,175
Stocks [2]	1,244,724	** 230,610	1,078,028	115,174	** 4,666
Bonds	61,699	**	* 18,952	** 50,649	0
Real estate [3]	404,191	**	351,010	**	0
Other assets [4]	1,296,069	**	607,275	550,318	**

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

**Data are combined to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

[1] Asset contributions are reported on Form 5227, Schedule A, Part III and include both initial contributions made when the trust is created and additional contributions made during the lifetime of the trust.

[2] The value of stock includes both publicly traded and closely held stocks.

[3] The value given for real estate includes traditional real estate as well as real estate mutual funds and partnerships.

[4] Other assets includes such items as retirement assets, annuities, partnerships, insurance assets, and art.

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

or pooled income fund) and the reported end-of-year book value of total assets. Figure L details the sampling strata and rates. The magnitude of sampling error for selected items, measured by coefficients of variation, is shown in Figure M.

All 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 of data. Changes that were made to the return after filing, either by the taxpayer (on an amended return) or during IRS processing, generally were not incorporated. A complete discussion of the reliability of estimates based on samples, methods for evaluating the magnitude of both sampling and nonsampling error, and the precision of the sample estimates can be found in SOI Sampling Methodology and Data Limitations later in this issue of the *SOI Bulletin* or at www.irs.gov/pub/irs-soi/sampling.pdf.

Figure L

Population, Sample, and Sampling Rates, by Type of Split-Interest Trust and Size of End-of-Year Book Value of Total Assets, Filing Year 2009

Type of trust, item	All	Reported end-of-year book value of total assets [1]		
		Less than \$1 million	\$1 million under \$10 million	\$10 million or more
	(1)	(2)	(3)	(4)
Charitable remainder annuity trusts:				
Population [2]	18,681	17,087	1,527	67
Sample	1,722	1,046	609	67
Sampling rate (percentage)	9.2	6.1	39.9	100.0
Charitable remainder unitrusts:				
Population [2]	96,332	82,371	13,153	808
Sample	9,265	4,089	4,368	808
Sampling rate (percentage)	9.6	5.0	33.2	100.0
Charitable lead trusts:				
Population [2]	6,741	4,463	1,998	280
Sample	1,037	246	511	280
Sampling rate (percentage)	15.4	5.5	25.6	100.0
Pooled income funds:				
Population [2]	1,444	1,230	188	26
Sample	238	117	95	26
Sampling rate (percentage)	16.5	9.5	50.5	100.0

[1] This is the value the tax preparer reported on Form 5227, Part IV, line 50, column (b). "Less than \$1 million" includes returns that did not report end-of-year book value of total assets from the balance sheet, or that reported the amount as zero.

[2] These population totals include returns that were rejected during the editing process. Returns could be rejected if they were not one of the four types of trusts included in the study or if no money amounts were reported. As a result, these totals may not match totals presented elsewhere in the article.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Figure M

Coefficients of Variation for Selected Items, by Type of Split-Interest Trust and Size of End-of-Year Book Value of Total Assets, Filing Year 2009

Type of trust, Item	All	Size of end-of-year book value of total assets		
		Under \$500,000 [1]	\$500,000 under \$3 million	\$3 million or more
	Coefficient of variation (percentage)			
	(1)	(2)	(3)	(4)
Charitable remainder annuity trusts:				
Number of returns	0.54	1.27	5.22	5.20
Net ordinary income [2]	2.85	6.76	5.18	4.62
Net capital gains [3]	13.43	30.18	23.75	18.82
Net capital losses [4]	4.90	9.47	8.18	9.07
Net nontaxable income [5]	9.35	25.65	12.92	14.79
End-of-year total assets (book value) [6]	1.82	3.77	3.91	3.35
End-of-year total liabilities (book value) [7]	13.39	21.75	25.68	10.32
Charitable remainder unitrusts:				
Number of returns	0.10	0.74	1.92	2.09
Net ordinary income [2]	0.93	5.39	3.98	0.60
Net capital gains [3]	1.23	10.42	6.89	1.10
Net capital losses [4]	3.47	9.21	3.89	5.85
Net nontaxable income [5]	13.91	13.70	27.11	4.97
End-of-year total assets (book value) [6]	0.46	1.46	1.38	0.69
End-of-year total assets (fair market value) [8]	4.64	9.44	8.52	6.44
End-of-year total liabilities (book value) [7]	0.87	2.20	2.81	0.76
Charitable lead trusts:				
Number of returns	0.36	3.98	5.03	3.77
Total ordinary income	27.27	81.55	8.12	2.35
Total capital gains	3.84	23.73	14.89	3.98
Total capital losses	6.28	24.77	16.07	5.82
Total nontaxable income	5.79	50.39	16.15	3.37
End-of-year total assets (book value) [6]	1.29	8.00	4.12	1.73
End-of-year total liabilities (book value) [7]	6.63	34.08	27.27	5.60
Pooled income funds:				
Number of returns	0.17	2.62	13.75	6.98
Total ordinary income	2.45	10.04	8.99	3.47
Total capital gains	8.83	41.47	27.43	9.03
Total capital losses	5.28	19.51	17.67	6.30
Total nontaxable income	3.66	N/A	N/A	3.66
End-of-year total assets (book value) [6]	2.52	9.47	9.27	3.63
End-of-year total liabilities (book value) [7]	0.81	43.78	63.69	0.27

N/A denotes a coefficient of variation that could not be calculated due to a lack of information.

[1] Includes returns that did not report end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing final returns.

[2] Reported on Form 5227, Part I, line 24b.

[3] Reported on Form 5227, Part I, line 25b where the value is positive.

[4] Reported on Form 5227, Part I, line 25b where the value is negative.

[5] Reported on Form 5227, Part I, line 26b.

[6] Reported on Form 5227, Part IV, line 50, column (b).

[7] Reported on Form 5227, Part IV, line 56, column (b).

[8] For charitable remainder unitrusts, taken from an estimated end-of-year fair market value.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 1. Charitable Remainder Annuity Trusts: Income and Deductions, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	18,572	15,017	2,010	1,174	307	65
Total net income [3]	197,019	28,133	41,830	44,299	48,915	33,841
Net ordinary income [4]	210,474	47,453	32,260	45,193	38,497	47,071
Total ordinary income	271,530	65,185	43,766	59,225	49,320	54,034
Interest income	85,940	18,100	15,787	19,682	14,892	17,478
Dividends and business income (loss)	162,124	40,865	26,750	34,163	27,001	33,345
Rents, royalties, partnerships, other estates and trusts, etc.	14,091	2,266	* -44	2,685	6,734	2,450
Farm income (loss)	* 97	0	0	* 97	0	0
Ordinary gain (loss)	100	* -33	0	[2]	* 142	-8
Other income	9,179	3,986	1,273	2,599	552	769
Deductions allocable to ordinary income [5]	61,056	17,732	11,506	14,031	10,823	6,964
Net capital gains (losses) [6]	-45,938	-26,308	3,371	-7,696	-308	-14,997
Total capital gains (losses)	-43,825	-25,353	3,873	-7,406	-46	-14,894
Total short-term capital gains (losses)	-174,958	-20,089	-32,862	-31,191	-39,736	-51,080
Total long-term capital gains (losses)	131,133	-5,264	36,735	23,786	39,690	36,186
Deductions allocable to capital gains [5]	2,112	956	* 502	291	261	103
Net nontaxable income [7]	32,482	6,989	6,198	6,802	10,725	1,767
Total nontaxable income	37,187	7,974	7,643	7,657	11,975	1,937
Tax-exempt interest	35,380	7,177	7,627	7,596	11,095	1,885
Other nontaxable income	1,807	798	* 16	* 61	* 880	52
Deductions allocable to nontaxable income [5]	4,705	985	1,444	855	1,250	170
Total deductions [8]	68,347	19,981	13,524	15,227	12,379	7,236
Interest	1,049	* 277	* 8	89	663	13
Taxes	1,227	112	204	203	549	159
Trustee fee	38,616	10,170	9,897	9,528	6,093	2,927
Attorney, accountant, and return preparer fees	8,029	4,595	1,234	1,300	675	225
Other allowable deductions	19,426	4,827	2,181	4,106	4,399	3,912

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Value is less than \$500.

[3] Calculated as the sum of "net ordinary income" (Form 5227, Part I, Section E, line 24b), "net capital gains (losses)" (line 25b), and "net nontaxable income" (line 26b).

[4] Taken from Form 5227, Part I, Section E, line 24b.

[5] Included in "total deductions" amount given on Form 5227, Part I, Section D, line 22.

[6] Taken from Form 5227, Part I, Section E, line 25b.

[7] Taken from Form 5227, Part I, Section E, line 26b.

[8] Taken from Form 5227, Part I, Section D, line 22.

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 2. Charitable Remainder Annuity Trusts: Accumulation and Distribution Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	18,572	15,017	2,010	1,174	307	65
Total accumulations of income [2]	5,153,398	1,460,055	651,234	969,998	932,620	1,139,491
Net ordinary income	433,300	88,646	45,805	86,967	110,906	100,976
Net capital gains (losses)	4,516,957	1,301,339	575,642	850,495	759,037	1,030,444
Net nontaxable income	203,141	70,069	29,787	32,536	62,678	8,071
Prior-year undistributed income [3]	4,956,379	1,431,921	609,404	925,699	883,705	1,105,650
Net ordinary income	222,826	41,193	13,545	41,774	72,409	53,905
Net capital gains (losses)	4,562,894	1,327,648	572,270	858,191	759,344	1,045,441
Net nontaxable income	170,659	63,080	23,589	25,734	51,952	6,303
Current year net income [4]	197,019	28,133	41,830	44,299	48,915	33,841
Net ordinary income	210,474	47,453	32,260	45,193	38,497	47,071
Net capital gains (losses)	-45,938	-26,308	3,371	-7,696	-308	-14,997
Net nontaxable income	32,482	6,989	6,198	6,802	10,725	1,767
Distributions of income [5]	561,405	192,161	91,175	108,820	83,416	85,833
Net ordinary income	205,744	56,291	32,844	43,334	31,733	41,543
Net capital gains (losses)	324,434	128,175	48,903	60,581	43,182	43,593
Net nontaxable income	31,226	7,695	9,428	4,905	8,502	698
Undistributed at end of year [6]	4,591,993	1,267,893	560,059	861,178	849,204	1,053,658
Net ordinary income	227,556	32,355	12,961	43,633	79,173	59,433
Net capital gains (losses)	4,192,522	1,173,164	526,738	789,913	715,855	986,852
Net nontaxable income	171,915	62,374	20,359	27,632	54,176	7,373

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Taken from Form 5227, Part II, line 29.

[3] Taken from Form 5227, Part II, line 27.

[4] Taken from Form 5227, Part II, line 28.

[5] Taken from Form 5227, Schedule A, Part I, line 2b.

[6] Taken from Form 5227, Schedule A, Part I, line 3.

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 3. Charitable Remainder Annuity Trusts: Book Value Balance Sheet Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	18,572	15,017	2,010	1,174	307	65
Total net assets [2]	8,139,773	1,638,437	1,461,339	1,831,411	1,567,803	1,640,783
Total assets [3]	8,232,133	1,687,129	1,466,421	1,850,100	1,575,371	1,653,112
Cash	150,731	34,576	47,836	38,095	22,930	7,295
Savings and temporary cash investments	655,093	105,057	124,833	155,615	134,874	134,713
Accounts receivable	5,238	2,823	* 591	998	* 26	800
Receivables due from officers, directors, trustees, etc.	18,864	9,680	* 384	* 988	0	7,812
Other notes and loans receivable	152,247	22,255	* 28,320	44,994	* 2,503	54,175
Inventories for sale or use	* 156	0	0	* 156	0	0
Prepaid expenses and deferred charges	560	* 88	* 68	* 402	* 2	0
Total investments	6,977,811	1,435,595	1,205,442	1,539,549	1,383,619	1,413,607
Securities	5,641,863	1,150,284	1,041,196	1,246,907	1,204,173	999,303
Government obligations	1,006,956	135,648	173,785	230,075	324,289	143,159
Corporate stock	3,701,494	796,064	681,168	801,862	688,201	734,199
Corporate bonds	933,412	218,572	186,243	214,970	191,683	121,944
Land, buildings, and equipment	108,707	* 16,442	0	48,896	* 29,694	13,675
Other investments	1,227,241	268,869	164,245	243,745	149,752	400,629
Charitable purpose land, buildings, and equipment	48,151	* 3,640	0	* 14,139	* 20,862	9,510
Other assets	223,277	73,413	58,948	55,162	* 10,553	25,200
Total liabilities [4]	92,360	48,692	5,082	18,689	7,568	12,330
Accounts payable and accrued expenses	14,233	9,654	* 2,866	1,641	* 50	21
Deferred revenue	* 5,313	* 1,539	0	* 3,774	0	0
Loans from officers, directors, trustees, etc.	* 1,370	* 103	0	* 837	* 430	0
Mortgages and other notes payable	* 5,750	* 5,293	0	* 238	* 218	0
Other liabilities	65,695	32,103	2,215	12,199	6,870	12,308

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Taken from Form 5227, Part IV, line 59, column (b). This is the excess of total assets over total liabilities. This value may deviate from the calculated value of total assets (line 50, column (b)) less total liabilities (line 56, column (b)) due to taxpayer reporting discrepancies.

[3] Taken from Form 5227, Part IV, line 50, column (b).

[4] Taken from Form 5227, Part IV, line 56, column (b).

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 4. Charitable Remainder Unitrusts: Income and Deductions, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	95,928	66,548	15,294	10,378	2,916	792
Total net income [2]	7,153,125	56,080	-4,560	196,760	-5,282	6,910,127
Net ordinary income [3]	3,650,181	294,393	262,810	408,058	324,701	2,360,219
Total ordinary income	5,853,173	437,156	355,964	539,043	439,750	4,081,259
Interest income	1,336,440	100,014	93,726	152,540	122,747	867,414
Dividends and business income (loss)	2,059,555	302,701	232,946	361,413	306,223	856,272
Rents, royalties, partnerships, other estates and trusts, etc.	855,245	17,063	14,350	12,965	10,220	800,646
Farm income (loss)	* 1	0	0	0	* 1	0
Ordinary gain (loss)	9,839	6,196	* 2,179	675	239	551
Other income	1,592,092	11,183	12,762	11,451	319	1,556,377
Deductions allocable to ordinary income [4]	2,202,991	142,763	93,154	130,985	115,049	1,721,040
Net capital gains (losses) [5]	3,394,351	-250,084	-297,773	-235,798	-352,951	4,530,958
Total capital gains (losses)	3,652,523	-240,814	-294,000	-226,523	-348,962	4,762,823
Total short-term capital gains (losses)	2,942,004	-241,317	-314,996	-470,064	-468,055	4,436,437
Total long-term capital gains (losses)	710,519	504	20,995	243,541	119,094	326,386
Deductions allocable to capital gains [4]	258,171	9,270	3,772	9,274	3,990	231,865
Net nontaxable income [6]	108,593	11,772	30,403	24,500	22,968	18,951
Total nontaxable income	134,981	15,057	33,315	34,481	27,980	24,148
Tax-exempt interest	110,573	11,296	16,291	31,881	27,713	23,393
Other nontaxable income	24,408	3,761	17,024	2,600	267	756
Deductions allocable to nontaxable income [4]	26,388	3,285	2,912	9,981	5,013	5,197
Total deductions [7]	2,506,034	158,386	99,939	151,445	124,152	1,972,111
Interest	608,317	720	1,071	1,864	3,449	601,213
Taxes	14,100	2,302	2,128	3,130	2,264	4,275
Trustee fee	231,036	64,728	49,032	57,922	36,780	22,574
Attorney, accountant, and return preparer fees	66,680	25,521	12,550	12,931	9,761	5,918
Other allowable deductions	1,585,901	65,115	35,158	75,598	71,899	1,338,131

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Calculated as the sum of "net ordinary income" (Form 5227, Part I, Section E, line 24b), "net capital gains (losses)" (line 25b), and "net nontaxable income" (line 26b).

[3] Taken from Form 5227, Part I, Section E, line 24b.

[4] Included in "total deductions" amount given on Form 5227, Part I, Section D, line 22.

[5] Taken from Form 5227, Part I, Section E, line 25b.

[6] Taken from Form 5227, Part I, Section E, line 26b.

[7] Taken from Form 5227, Part I, Section D, line 22.

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 5. Charitable Remainder Unitrusts: Accumulation and Distribution Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	95,928	66,548	15,294	10,378	2,916	792
Total accumulations of income [2]	76,535,528	7,321,098	6,697,569	11,523,965	11,255,675	39,737,222
Net ordinary income	9,271,093	431,825	363,188	714,417	619,177	7,142,486
Net capital gains (losses)	66,662,731	6,819,655	6,235,446	10,631,588	10,491,473	32,484,568
Net nontaxable income	601,705	69,618	98,935	177,960	145,024	110,167
Prior-year undistributed income [3]	69,382,404	7,265,018	6,702,130	11,327,205	11,260,957	32,827,094
Net ordinary income	5,620,912	137,432	100,378	306,358	294,476	4,782,268
Net capital gains (losses)	63,268,379	7,069,739	6,533,219	10,867,386	10,844,425	27,953,611
Net nontaxable income	493,113	57,848	68,533	153,460	122,056	91,216
Current year net income [4]	7,153,125	56,080	-4,560	196,760	-5,282	6,910,127
Net ordinary income	3,650,181	294,393	262,810	408,058	324,701	2,360,219
Net capital gains (losses)	3,394,351	-250,084	-297,773	-235,798	-352,951	4,530,958
Net nontaxable income	108,593	11,772	30,403	24,500	22,968	18,951
Distributions of income [5]	5,613,632	1,004,423	729,652	1,189,695	1,043,720	1,646,142
Net ordinary income	2,045,051	336,098	266,715	432,027	347,058	663,153
Net capital gains (losses)	3,511,096	657,765	451,937	742,487	683,201	975,706
Net nontaxable income	57,485	10,561	11,000	15,181	13,461	7,283
Undistributed at end of year [6]	70,921,895	6,316,673	5,967,918	10,334,270	10,211,955	38,091,080
Net ordinary income	7,226,042	95,726	96,473	282,390	272,120	6,479,333
Net capital gains (losses)	63,151,633	6,161,889	5,783,509	9,889,101	9,808,272	31,508,862
Net nontaxable income	544,220	59,058	87,936	162,779	131,563	102,884

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Taken from Form 5227, Part II, line 29.

[3] Taken from Form 5227, Part II, line 27.

[4] Taken from Form 5227, Part II, line 28.

[5] Taken from Form 5227, Schedule A, Part I, line 2b.

[6] Taken from Form 5227, Schedule A, Part I, line 3.

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 6. Charitable Remainder Unitrusts: Book Value Balance Sheet Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	95,928	66,548	15,294	10,378	2,916	792
Total net assets [2]	96,060,677	11,799,211	10,677,407	16,618,751	14,499,762	42,465,546
Total assets [3]	97,345,279	11,951,242	10,829,255	16,881,469	14,778,595	42,904,719
Cash	1,457,079	250,540	193,805	367,968	316,576	328,190
Savings and temporary cash investments	6,272,621	834,365	906,461	1,341,532	1,240,291	1,949,972
Accounts receivable	134,824	22,885	28,025	30,110	22,589	31,216
Receivables due from officers, directors, trustees, etc.	41,248	1,485	* 2,101	8,089	* 10,892	18,681
Other notes and loans receivable	1,007,184	124,995	143,753	258,996	262,110	217,329
Inventories for sale or use	* 52	0	0	* 52	0	0
Prepaid expenses and deferred charges	8,293	848	* 1,771	4,400	830	445
Total investments	86,542,973	10,363,343	9,183,865	14,436,052	12,543,227	40,016,486
Securities	50,168,727	8,158,819	7,486,442	11,579,943	9,388,998	13,554,525
Government obligations	4,640,086	421,827	643,304	1,097,351	1,089,551	1,388,053
Corporate stock	38,798,487	6,492,419	5,645,935	8,979,602	7,196,411	10,484,120
Corporate bonds	6,730,154	1,244,573	1,197,203	1,502,990	1,103,036	1,682,352
Land, buildings, and equipment	914,942	119,476	135,777	260,857	214,228	184,605
Other investments	35,459,305	2,085,048	1,561,646	2,595,253	2,940,001	26,277,357
Charitable purpose land, buildings, and equipment	281,109	44,347	* 47,125	100,881	* 59,186	29,571
Other assets	1,599,878	308,421	322,346	333,388	322,893	312,831
Total liabilities [4]	1,284,603	152,031	151,848	262,718	278,832	439,173
Accounts payable and accrued expenses	175,802	22,839	25,147	44,013	41,581	42,222
Deferred revenue	26,281	* 4,174	* 650	8,147	* 2,409	10,900
Loans from officers, directors, trustees, etc.	6,424	3,897	* 366	1,129	* 204	827
Mortgages and other notes payable	98,071	* 525	* 5,437	* 11,269	* 42,056	38,783
Other liabilities	978,026	120,594	120,249	198,160	192,581	346,441

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Taken from Form 5227, Part IV, line 59, column (b). This is the excess of total assets over total liabilities. This value may deviate from the calculated value of total assets (line 50, column (b)) less total liabilities (line 56, column (b)) due to taxpayer reporting discrepancies.

[3] Taken from Form 5227, Part IV, line 50, column (b).

[4] Taken from Form 5227, Part IV, line 56, column (b).

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 7. Charitable Remainder Unitrusts: End-of-Year Fair Market Value Asset Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	95,928	66,548	15,294	10,378	2,916	792
Total assets [2]	92,165,720	11,362,431	9,689,991	15,902,358	13,607,517	41,603,422
Cash	1,709,862	262,810	203,532	562,180	308,895	372,445
Savings and temporary cash investments	6,229,897	820,591	879,651	1,331,800	1,248,729	1,949,127
Accounts receivable	130,616	22,463	27,761	29,847	21,583	28,962
Receivables due from officers, directors, trustees, etc.	38,524	1,452	* 54	7,799	* 10,892	18,327
Other notes and loans receivable	952,434	120,245	123,989	250,872	257,487	199,841
Inventories for sale or use	* 37	0	0	* 37	0	0
Prepaid expenses and deferred charges	7,395	* 502	* 1,743	4,173	543	434
Total investments	80,786,240	9,504,713	8,032,872	13,260,752	11,358,025	38,629,878
Securities	47,140,280	7,334,129	6,392,499	10,566,501	8,487,685	14,359,466
Government obligations	4,540,711	398,439	624,364	1,103,147	1,071,485	1,343,277
Corporate stock	36,764,393	5,853,696	4,731,411	8,154,848	6,411,757	11,612,682
Corporate bonds	5,835,176	1,081,994	1,036,725	1,308,507	1,004,443	1,403,507
Land, buildings, and equipment	1,302,109	325,355	237,539	307,354	240,490	191,371
Other investments	32,343,851	1,845,230	1,402,834	2,386,897	2,629,850	24,079,041
Charitable purpose land, buildings, and equipment	526,296	220,071	* 94,346	121,201	59,260	31,418
Other assets	1,784,402	409,572	326,042	333,694	342,104	372,990

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Taken from Form 5227, Part IV, line 50.

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 8. Charitable Lead Trusts: Income, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	6,626	3,120	1,183	1,362	679	282
Total income [3]	1,196,118	352,865	-21,583	26,791	82,506	755,540
Total ordinary income	1,203,112	401,893	31,100	92,563	150,956	526,601
Interest income	240,583	37,011	7,259	20,086	33,672	142,556
Dividends and business income (loss)	936,970	369,902	21,246	63,764	89,249	392,810
Rents, royalties, partnerships, other estates and trusts, etc.	41,706	15,039	2,214	8,926	26,489	-10,962
Farm income (loss)	* 53	0	0	0	* 53	0
Ordinary gain (loss)	-46,449	* -20,336	* -48	170	-565	-25,670
Other income	30,249	278	* 429	-382	2,058	27,867
Total capital gains (losses)	-46,461	-52,774	-54,599	-68,995	-73,167	203,074
Total short-term capital gains (losses)	-533,456	-49,464	-35,696	-80,273	-108,596	-259,427
Total long-term capital gains (losses)	486,995	-3,309	-18,903	11,277	35,429	462,501
Total nontaxable income	39,467	3,746	1,916	3,223	4,717	25,865
Tax-exempt interest	38,517	3,746	1,497	3,223	4,709	25,342
Other nontaxable income	950	0	* 419	[2]	* 8	523

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Value is less than \$500.

[3] Calculated as the sum of "total ordinary income" (Form 5227, Part I, Section A, line 8), "total capital gains (losses)" (Section B, line 13), and "total nontaxable income" (Section C, line 16).

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 9. Charitable Lead Trusts: Book Value Balance Sheet Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	6,626	3,120	1,183	1,362	679	282
Total net assets [3]	18,274,043	463,178	844,018	2,286,647	3,521,162	11,159,038
Total assets [4]	18,633,726	499,134	861,755	2,320,442	3,575,610	11,376,785
Cash	429,116	37,632	31,496	46,728	72,635	240,626
Savings and temporary cash investments	1,595,261	56,321	54,094	209,308	358,997	916,541
Accounts receivable	34,810	* 264	* 35	1,220	20,376	12,914
Receivables due from officers, directors, trustees, etc.	* 17,516	0	0	* 6,398	* 505	10,613
Other notes and loans receivable	199,820	* 782	* 14,267	35,592	* 26,517	122,661
Inventories for sale or use	0	0	0	0	0	0
Prepaid expenses and deferred charges	4,306	* 28	* 407	* 275	* 813	2,783
Total investments	15,244,402	395,415	727,172	1,881,364	2,978,297	9,262,154
Securities	7,593,341	293,806	518,665	1,365,609	1,577,545	3,837,716
Government obligations	619,023	19,625	44,727	95,562	139,613	319,496
Corporate stock	6,286,435	241,377	441,118	1,112,177	1,229,933	3,261,830
Corporate bonds	687,883	32,805	32,820	157,870	207,999	256,389
Land, buildings, and equipment	182,174	* 8,146	* 13,795	* 12,378	* 33,688	114,167
Other investments	7,468,887	93,462	194,712	503,377	1,367,064	5,310,271
Charitable purpose land, buildings, and equipment	* 16,134	0	* 5	* 4,692	* 11,413	24
Other assets	1,092,361	8,693	* 34,279	134,864	106,057	808,467
Total liabilities [5]	359,683	35,955	* 17,737	33,796	54,448	217,747
Accounts payable and accrued expenses	78,541	* 1,711	* 116	2,455	* 12,286	61,972
Deferred revenue	[2]	0	0	0	0	[2]
Loans from officers, directors, trustees, etc.	* 3,571	* 2,011	* 67	* 743	0	750
Mortgages and other notes payable	40,007	* 2,607	0	* 4,354	* 1,246	31,800
Other liabilities	237,564	29,626	* 17,554	26,244	40,915	123,225

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by trusts filing a final return.

[2] Value is less than \$500.

[3] Taken from Form 5227, Part IV, line 59, column (b). This is the excess of total assets over total liabilities. This value may deviate from the calculated value of total assets (line 50, column (b)) less total liabilities (line 56, column (b)) due to taxpayer reporting discrepancies.

[4] Taken from Form 5227, Part IV, line 50, column (b).

[5] Taken from Form 5227, Part IV, line 56, column (b).

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 10. Pooled Income Funds: Income, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	1,415	1,105	* 95	122	69	25
Total income [3]	40,267	3,315	* 1,739	3,104	9,543	22,567
Total ordinary income	69,855	5,363	* 2,689	9,397	16,854	35,552
Interest income	23,479	1,540	* 854	4,143	9,422	7,519
Dividends and business income (loss)	45,929	3,750	* 1,835	5,211	7,429	27,704
Rents, royalties, partnerships, other estates and trusts, etc.	* 333	0	0	* 7	0	326
Farm income (loss)	0	0	0	0	0	0
Ordinary gain (loss)	0	0	0	0	0	0
Other income	114	72	0	* 36	* 2	3
Total capital gains (losses)	-29,589	-2,048	* -950	-6,293	-7,311	-12,986
Total short-term capital gains (losses)	-15,051	-732	* -70	-1,970	-5,082	-7,198
Total long-term capital gains (losses)	-14,537	-1,317	* -880	-4,323	-2,230	-5,788
Total nontaxable income	* 1	0	0	0	[2]	1
Tax-exempt interest	* 1	0	0	0	[2]	1
Other nontaxable income	0	0	0	0	0	0

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by funds filing a final return.

[2] Value is less than \$500.

[3] Calculated as the sum of "total ordinary income" (Form 5227, Part I, Section A, line 8), "total capital gains (losses)" (Section B, line 13), and "total nontaxable income" (Section C, line 16).

NOTE: Detail may not add to totals due to rounding.

Split-Interest Trusts, Filing Year 2009

Statistics of Income Bulletin | Winter 2011

Table 11. Pooled Income Funds: Book Value Balance Sheet Information, by Size of End-of-Year Book Value of Total Assets, Filing Year 2009

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

Item	Total	Size of end-of-year book value of total assets				
		Under \$500,000 [1]	\$500,000 under \$1,000,000	\$1,000,000 under \$3,000,000	\$3,000,000 under \$10,000,000	\$10,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)
Number of returns	1,415	1,105	* 95	122	69	25
Total net assets [2]	1,317,783	125,308	* 67,368	198,138	381,393	545,577
Total assets [3]	1,468,871	125,543	* 67,427	199,886	382,356	693,659
Cash	8,341	1,169	* 213	2,022	1,621	3,315
Savings and temporary cash investments	48,625	11,278	* 3,467	13,843	6,476	13,562
Accounts receivable	777	* 6	* 56	* 6	* 10	699
Receivables due from officers, directors, trustees, etc.	0	0	0	0	0	0
Other notes and loans receivable	* 12,343	0	0	* 36	0	12,307
Inventories for sale or use	0	0	0	0	0	0
Prepaid expenses and deferred charges	* 55	0	0	0	* 55	0
Total investments	1,364,472	98,472	* 56,817	179,647	374,194	655,343
Securities	914,681	77,593	* 48,572	152,826	262,222	373,468
Government obligations	143,101	11,183	* 522	14,162	24,285	92,949
Corporate stock	362,512	28,436	* 13,894	49,122	106,423	164,637
Corporate bonds	409,068	37,974	* 34,156	89,542	131,514	115,882
Land, buildings, and equipment	* 28,145	0	0	0	0	28,145
Other investments	421,647	20,879	* 8,245	26,821	111,972	253,730
Charitable purpose land, buildings, and equipment	* 8,259	0	0	0	0	8,259
Other assets	26,000	14,618	* 6,874	* 4,332	0	175
Total liabilities [4]	151,088	* 235	* 60	* 1,748	* 963	148,082
Accounts payable and accrued expenses	3,982	* 39	* 60	* 14	0	3,869
Deferred revenue	* 110,338	0	0	* 1,620	0	108,717
Loans from officers, directors, trustees, etc.	0	0	0	0	0	0
Mortgages and other notes payable	* 32,403	0	0	0	0	32,403
Other liabilities	4,366	* 196	0	* 113	* 963	3,093

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

[1] Includes returns that did not report the end-of-year book value of total assets (Form 5227, Part IV, line 50, column (b)) from the balance sheet, or that reported the amount as zero. Often, these zero amounts are explained by funds filing a final return.

[2] Taken from Form 5227, Part IV, line 59, column (b). This is the excess of total assets over total liabilities. This value may deviate from the calculated value of total assets (line 50, column (b)) less total liabilities (line 56, column (b)) due to taxpayer reporting discrepancies.

[3] Taken from Form 5227, Part IV, line 50, column (b).

[4] Taken from Form 5227, Part IV, line 56, column (b).

NOTE: Detail may not add to totals due to rounding.