

**LIFETIME TRANSFERS: INSTALLMENT SALES TO GRANTOR TRUSTS, GRATS, AND MORE**

**TABLE OF CONTENTS**

	<b><u>Page</u></b>
I. Installment Sales to Grantor Trusts.....	1
A. General.....	1
B. Grantor Trusts.....	2
C. Sale to a Grantor Trust.....	9
D. Tax Consequences.....	14
E. Death of Grantor Before Satisfaction of Note.....	18
F. Using Formulas to Define Transfers.....	20
G. Potential IRS Challenges.....	23
H. Conclusion.....	25
II. Alternatives to Installment Sales.....	25
A. Preferred Equity Interests.....	25
B. GRATs.....	33
C. Self Canceling Installment Note.....	38
D. Private Annuities.....	41
E. Financed Net Gifts.....	47