

PlanWiz, LLP



GRAT vs. Sale to Grantor Trust

**An Illustration Comparing the Use of a Grantor Retained Annuity
Trust with an Installment Sale to a Grantor Trust**

AN ANALYSIS PREPARED EXCLUSIVELY FOR

John & Mary Sample

Estate Freeze Planning Comparison for ShopRight, Inc. Stock

Disclaimer

This financial plan is designed to provide educational and/or general information and is not intended to provide specific legal, accounting and/or tax advice. Any comparisons and projections including expected rates of return are presented for purposes of illustration only. Nevertheless, we believe that the comparisons as well as the other projections shown provide an important and valid basis for consideration when planning for your financial future.

IMPORTANT: *The projections or other information generated by this financial plan regarding the likelihood of various investment outcomes are hypothetical in nature, do not reflect actual investment results and are not guarantees of future results. Results herein may vary with each use of the software tool(s) used to generate this financial plan and over time.*

The financial plan may contain ideas for your consideration concerning aspects of your life such as tax, retirement and estate planning, but these are not presented as, and must not be taken for, legal or tax advice. It is your responsibility to determine if, and how, the suggestions contained in the financial plan should be implemented or otherwise followed. You must carefully consider all relevant factors in making these types of decisions. For specific advice on these aspects of your overall financial plan, you should consult your professional tax and legal advisors. The report that follows is based upon:

- information and assumptions that you have provided or reviewed;
- current tax laws;
- appropriate financial planning concepts;
- historic asset class characteristics;
- additional assumptions and information discussed with your advisor.

The outcome of the analysis will be dependent to a significant extent upon the information and the reasonableness of the planning assumptions. It is your responsibility to provide accurate and complete information. Please contact your advisor with any changes to your information and/or planning assumptions. Inaccurate information and/or unreasonable planning assumptions can materially impact the results of this financial plan.

The simulation of returns at the individual asset, account and/or portfolio level drives the investment projections and proposed financial plan. In all cases investment projections are not to be considered definitive estimates of how the individual assets you own now or in the future will perform. Therefore, it is important that you recognize that the comparisons shown may include comparisons of two asset allocation models—the asset allocation of your current portfolio and the asset allocation projected in our proposed plan—and not comparisons of the individual securities you own. Model comparisons and the projected rates of return are based on past performance of the relevant asset classes. Past performance is not a guarantee of future results. No future rate of return can be predicted with certainty.

The report that follows does not make specific investment recommendations or analyze particular securities. Rather, the report typically contains a proposed asset allocation model based upon your stated risk tolerance, age, current asset allocation and value of your assets. The asset allocation models we use are continuously re-evaluated and are periodically changed as a result. We are under no obligation to revise any financial planning report already prepared if an allocation model is changed after it is issued to you.

Actual results are influenced by events that are both within and outside of your control. The rates actually returned by asset classes will differ from our projections. The rates actually returned by any allocation model noted within the financial plan will likely differ from those returned by any individual portfolio of securities constructed to follow a specific allocation model. Any rate of return shown or used in the financial plan is not intended to predict nor guarantee the actual results of an investment product.

Disclaimer

IMPORTANT: *Investments in stocks, bonds, mutual funds, and other securities are not bank products, are not FDIC insured, and may be subject to loss of principal.*

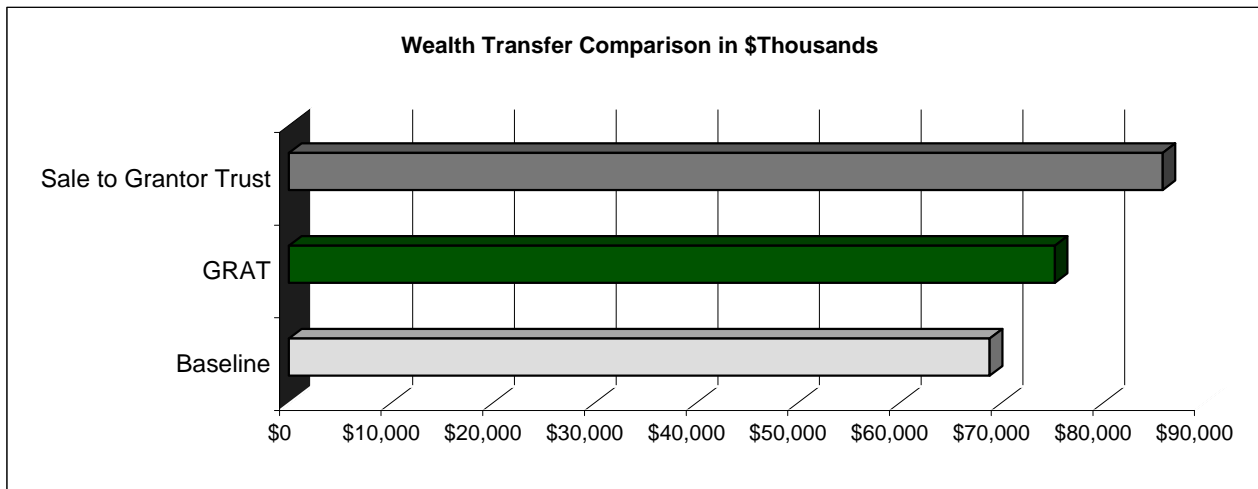
We have read and understand the above information and disclosures. We understand the basis upon which the report that follows was prepared. We recognize the nature of the asset allocation comparisons and estimated returns as illustrations only. We acknowledge that the report may contain a recommendation for adjusting the asset allocation of our current investment portfolio(s), but it does not provide any guaranteed rates of return, advice on particular securities or any specific legal, tax or accounting advice.

Customer Signature

Summary

John & Mary Sample

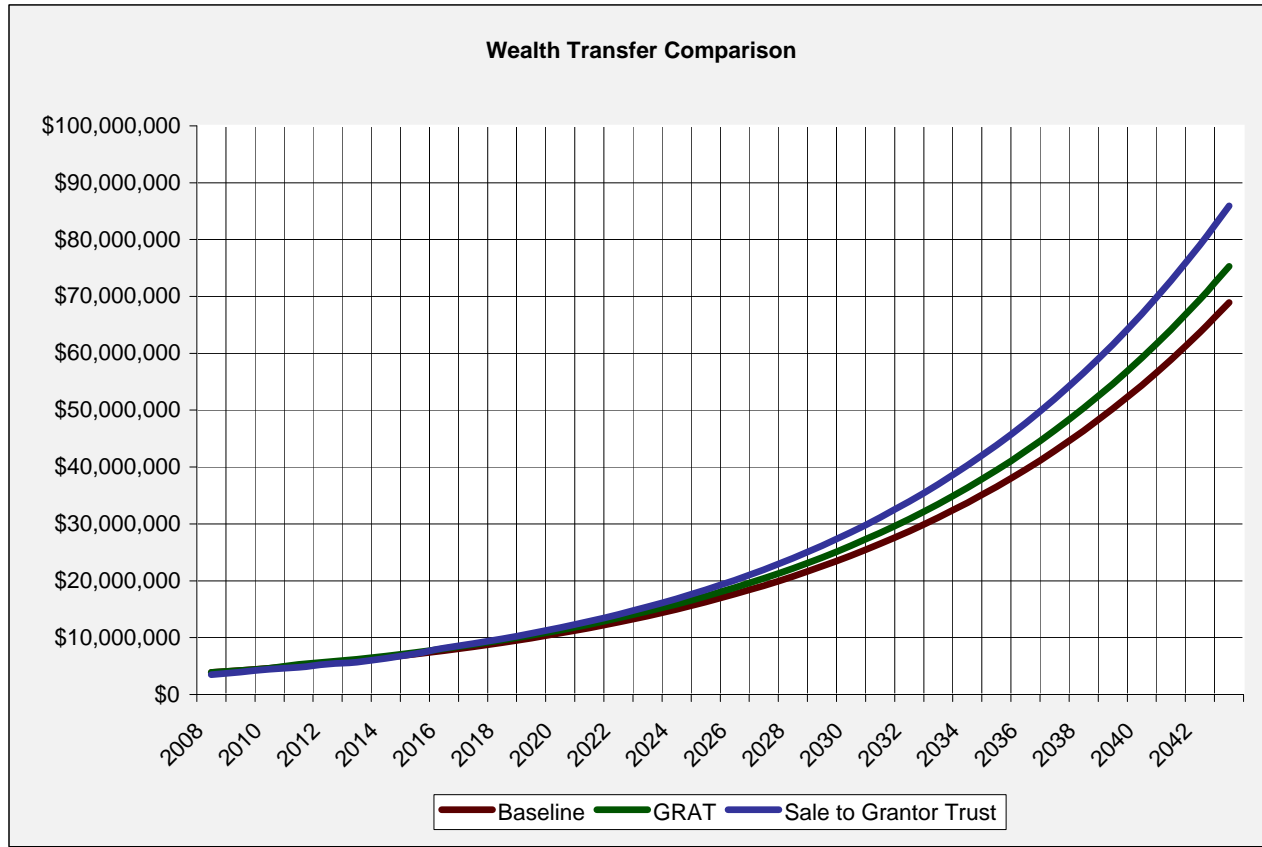
At John's Death in 2043	Baseline	GRAT	Sale to Grantor Trust
Taxable gift	NA	0	325,000
Value of trust at the end of the GRAT or note term	NA	1,885,834	8,285,212
Grantor's accumulations/-estate depletion	108,950,563	79,449,880	22,954,084
Total transferable value in 2043	108,950,563	108,950,563	108,950,563
Estate taxes or tax savings	-40,031,399	-29,344,692	-9,587,839
Deferred capital gains and Medicare taxes	-15,308,083	-4,289,058	-13,435,170
Net to heirs	68,919,164	75,316,814	85,927,554
Planning advantage/-disadvantage over baseline		6,397,650	17,008,390
Present value of advantage/-disadvantage @ 3.0%		2,207,397	5,868,446



NOTE: Please refer to the accompanying reports illustrating the GRAT and installment sale to grantor trust planning techniques for the detailed schedules, charts and planning assumptions used for this comparative analysis.

Annual Net to Heirs Comparison

John & Mary Sample



The chart above compares a GRAT and an installment sale to a grantor trust to the baseline over the planning horizon.



Grantor Retained Annuity Trust

An Illustration of the Use of a Grantor Retained Annuity Trust

AN ANALYSIS PREPARED EXCLUSIVELY FOR

John & Mary Sample

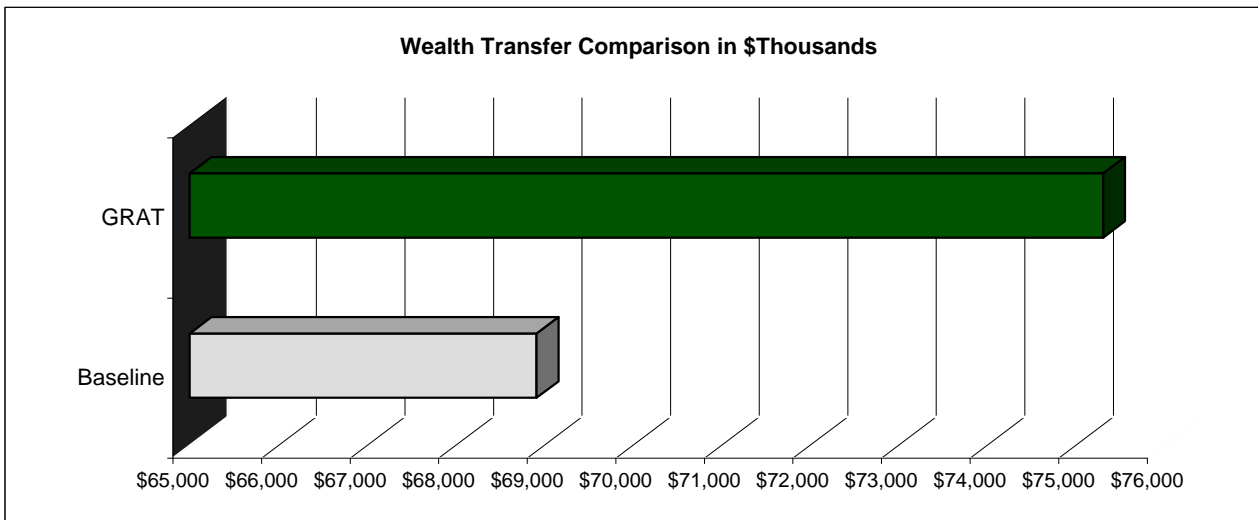
Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

Grantor Retained Annuity Trust - Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

Summary

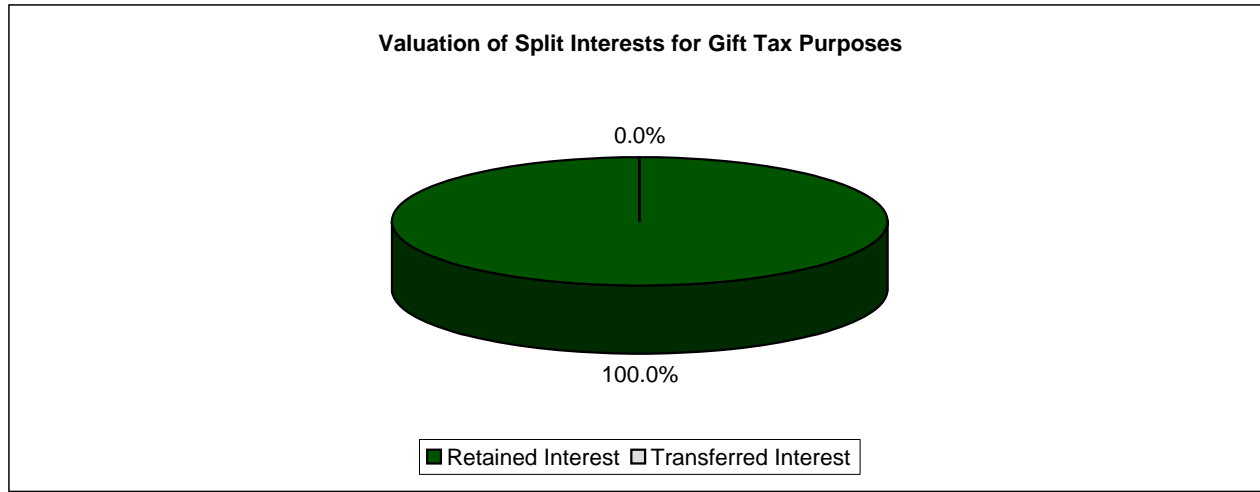
John & Mary Sample

At John's Death in 2043	Baseline	GRAT
Taxable gift	NA	0
Value of GRAT at the end of 4 years in 2011	NA	1,885,834
Grantor's GRAT-related accumulations/-estate depletion	108,950,563	79,449,880
Total transferable value in 2043	108,950,563	108,950,563
Estate taxes or tax savings	-40,031,399	-29,344,692
Deferred capital gains and Medicare taxes	0	-4,289,058
Net to heirs	68,919,164	75,316,814
Planning advantage/-disadvantage over baseline		6,397,650
Present value of advantage/-disadvantage @ 3.0%		2,207,397



Actuarial Summary

John & Mary Sample



Relevant Actuarial Calculations & Applicable Tests	
Retained interest factor	100.0000%
Reversion factor	0.0000%
Annuity exhaustion test of the Sec. 7520 Regs & Rev. Rul. 77-454	Passed
Taxable gift	0

Grantor Retained Annuity Trust - Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

Assumptions

John & Mary Sample

Personal	John	Mary
Age	54.0	51.0
Calculated life expectancy	85.4	85.2
Life expectancy override	90.0	90.0
Year of death	2043	2046
Post-1976 adjusted taxable gifts	0	0
Unified credit used	0	0

Planning Illustration

Transfer date		01-Jan-2008
Tax laws to apply - EGTRRA 2001	New law provisions sunset after 2010	
Tax laws to apply - JGTRRA 2003	New law provisions sunset after 2010	
Tax laws to apply - estate, gift & GST	2009 tax rates and exemptions apply indefinitely	
Transferor		John
Gift-splitting		No
Type of trust		Fixed term
Annuity is valued as an interest for a term certain		Yes
Trust term		4 years
Planning term	Transferor's life expectancy	
Calculation of GRAT annuity		Optimized
GRAT annuity factor		4.7789
First-year annuity payout rate		20.92532%
Annual increase in annuity rate		20.0%
GRAT payment frequency		Annual
Contingent spousal annuity		No
Section 7520 rate		4.4%
Section 7520 mortality table		90CM

Property Transferred

Undiscounted value of property		5,000,000
Basis of property		1,500,000
Type of property transferred	S corporation stock	
Gift tax valuation discount		35.0%
Estate tax valuation discount		35.0%
Apply estate tax valuation discount in baseline scenario		Yes

Sale of GRAT Property

GRAT sale during trust term		No
Grantor tax reimbursement		NA

Grantor Retained Annuity Trust - Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

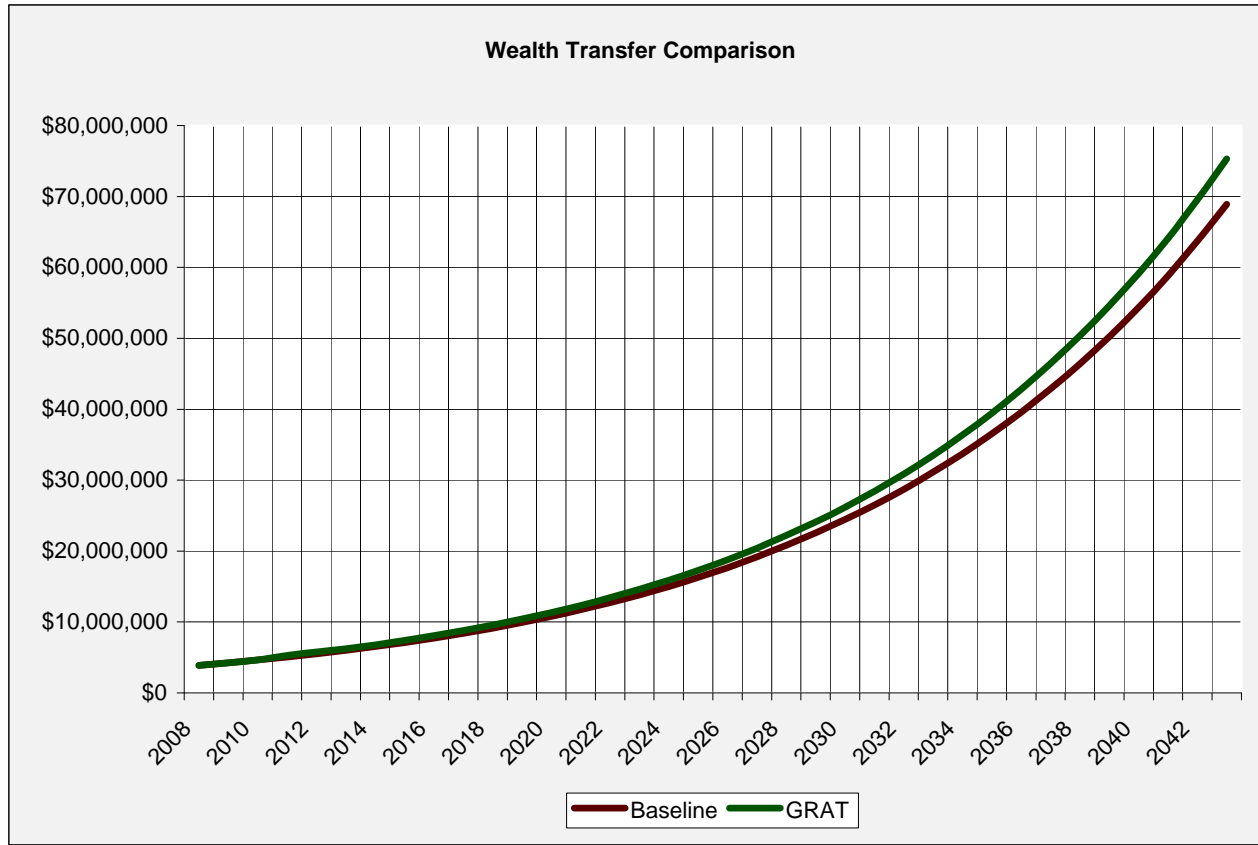
Assumptions

John & Mary Sample

Tax Rates	John	Transferee
Federal tax bracket	See schedule	See schedule
Federal capital gains tax rate	See schedule	See schedule
State income tax rate	5.0%	5.0%
Estate tax rate	See schedule	NA
Investment Rates	S corp	Other
Current cash yield	5.0%	2.0%
Inc/-dec rate of cash yield	0.0%	NA
Tax yield multiple	100.0%	NA
Qualified dividend percentage	0.0%	100.0%
Base growth rate	7.0%	8.0%
Percentage of taxable income and realized gains subject to Medicare surtax	100.0%	100.0%
Present value discount rate	NA	3.0%
Other		
Property distributions from the trust are grossed up for valuation discounts		Yes
Distribute corpus to grantor trust after GRAT term		No
Summary results are shown net of deferred capital gains and Medicare taxes		Yes

Annual Net to Heirs Comparison

John & Mary Sample



The illustration above compares a GRAT to the baseline over the planning horizon.

Grantor Retained Annuity Trust - Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

Annual Net to Heirs Comparison

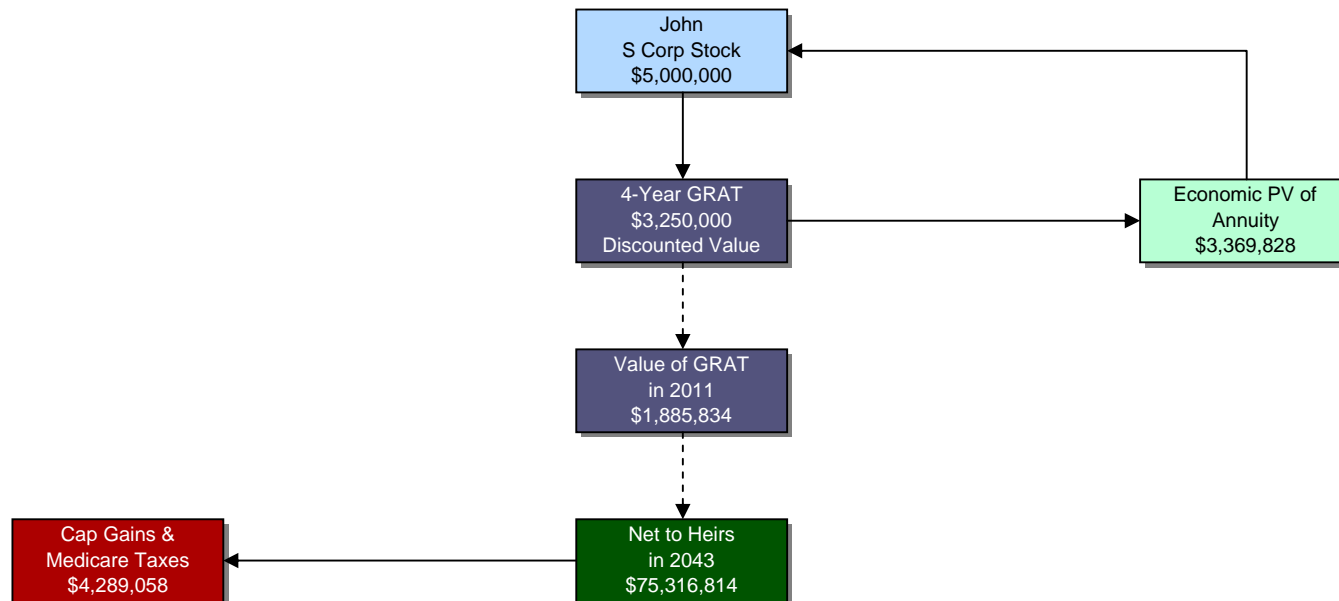
John & Mary Sample

Year Ending In	Net to Heirs		Comparison	
	Baseline Scenario	GRAT Scenario	Projected GRAT Adv-/Disadv	Present Value GRAT Adv-/Disadv 3.0%
2008	3,869,963	3,869,963	0	0
2009	4,232,629	4,232,629	0	0
2010	4,628,179	4,628,179	0	0
2011	5,049,745	5,266,880	217,134	192,921
2012	5,507,953	5,757,694	249,741	215,429
2013	5,996,485	6,215,432	218,947	183,365
2014	6,526,347	6,778,526	252,178	205,044
2015	7,100,929	7,390,467	289,538	228,564
2016	7,723,888	8,055,326	331,439	254,020
2017	8,399,176	8,777,508	378,332	281,515
2018	9,131,060	9,561,770	430,710	311,154
2019	9,924,148	10,413,259	489,110	343,052
2020	10,783,416	11,337,533	554,116	377,326
2021	11,714,235	12,340,600	626,365	414,101
2022	12,722,402	13,428,953	706,551	453,508
2023	13,814,178	14,609,606	795,428	495,684
2024	14,996,318	15,890,137	893,819	540,775
2025	16,276,113	17,278,730	1,002,616	588,931
2026	17,661,432	18,784,226	1,122,794	640,314
2027	19,160,766	20,416,174	1,255,408	695,089
2028	20,783,275	22,184,884	1,401,609	753,434
2029	22,538,846	24,101,491	1,562,645	815,533
2030	24,438,142	26,178,016	1,739,874	881,580
2031	26,492,668	28,427,438	1,934,771	951,779
2032	28,714,833	30,863,768	2,148,935	1,026,343
2033	31,118,022	33,502,129	2,384,107	1,105,498
2034	33,716,671	36,358,844	2,642,173	1,189,477
2035	36,526,351	39,451,533	2,925,181	1,278,529
2036	39,563,851	42,799,205	3,235,355	1,372,911
2037	42,847,275	46,422,379	3,575,104	1,472,896
2038	46,396,146	50,343,190	3,947,044	1,578,767
2039	50,231,511	54,585,523	4,354,011	1,690,824
2040	54,376,064	59,175,144	4,799,080	1,809,379
2041	58,854,266	64,139,851	5,285,584	1,934,761
2042	63,692,491	69,509,627	5,817,136	2,067,314
2043	68,919,164	75,316,814	6,397,650	2,207,397

Grantor Retained Annuity Trust Illustration

John & Mary Sample

Assumes an Increasing Annuity and No Sale of Transferred Property during the GRAT Term



Assuming the transferred property is sold following John's death, the use of a GRAT in this manner is projected to produce a net after-tax benefit of \$6,397,650, or \$2,207,397 in today's dollars.

If, however, the property is not sold, the projected benefit of a GRAT would be \$10,686,708, or \$3,687,261 in today's dollars.



Grantor Retained Annuity Trust

Sensitivity Analyses

AN ANALYSIS PREPARED EXCLUSIVELY FOR

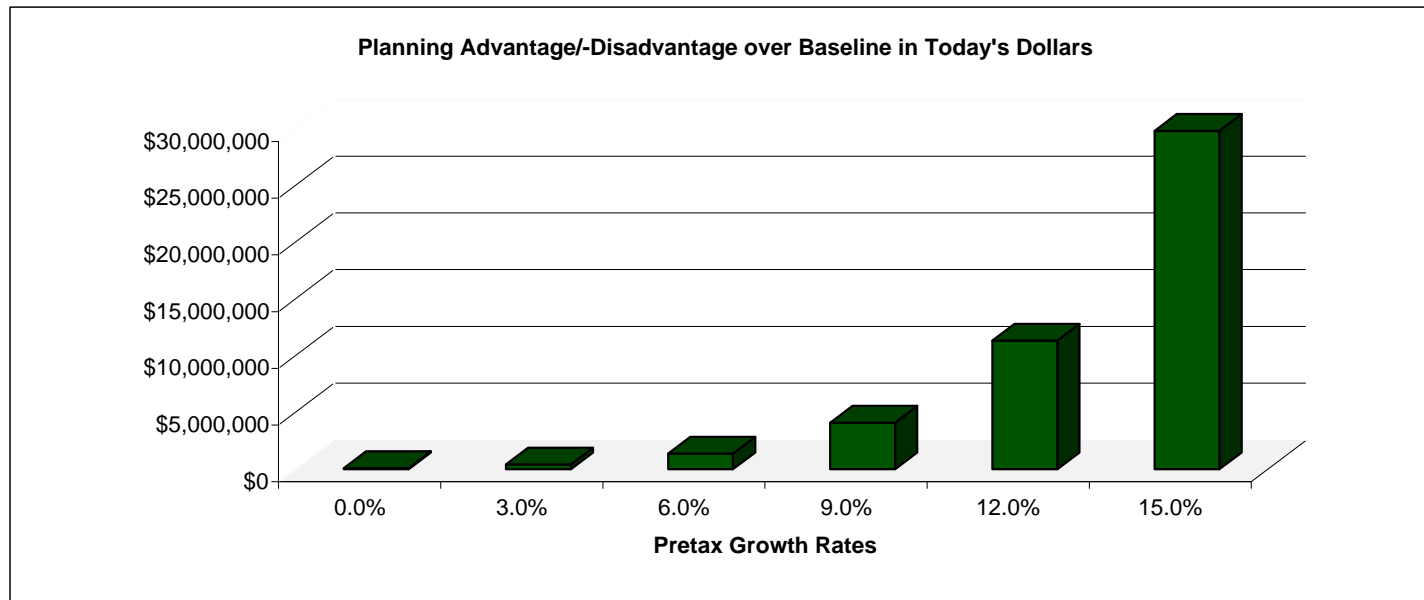
John & Mary Sample

Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

Sensitivity Analysis - Growth Rates

John & Mary Sample

2043 Growth	Net to Heirs		Comparison to Baseline	
	Baseline	GRAT	Projected Adv/-Disadv	PV of Adv/-Disadv
0.0%	6,819,974	7,119,754	299,780	103,434
3.0%	18,212,768	19,438,266	1,225,497	422,836
6.0%	47,820,748	51,836,187	4,015,439	1,385,457
9.0%	123,360,074	135,232,924	11,872,850	4,096,518
12.0%	312,496,739	345,335,214	32,838,475	11,330,339
15.0%	777,197,277	863,615,703	86,418,426	29,817,159



The illustration above shows the impact of pretax growth rate assumptions on the projected results. The graph shows the advantages or disadvantages of a GRAT, as compared to the baseline scenario, in today's dollars.

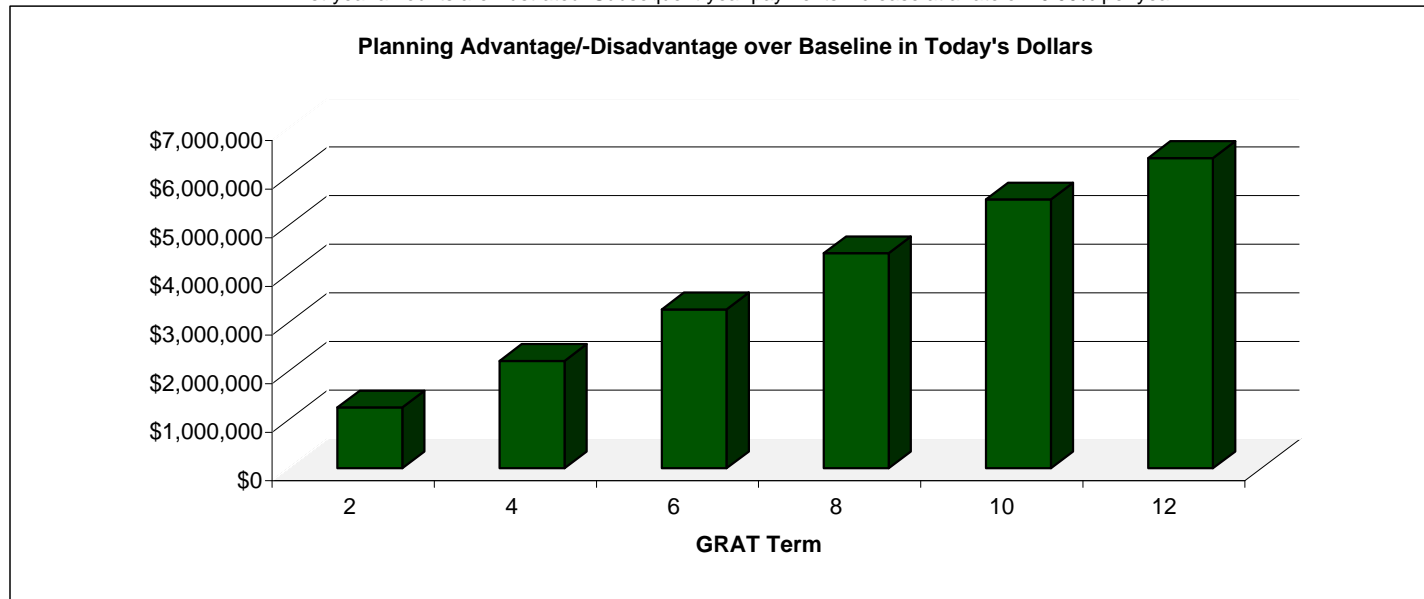
Note that all other assumptions are the same as those listed on the Assumptions schedule.

Sensitivity Analysis - GRAT Term

John & Mary Sample

2043 GRAT Term	GRAT Summary		Comparison to Baseline	
	Annuity *	Net to Heirs	Projected Adv/-Disadv	PV of Adv/-Disadv
2	1,578,589	72,542,810	3,623,646	1,250,275
4	680,073	75,316,814	6,397,650	2,207,397
6	388,166	78,387,122	9,467,957	3,266,752
8	247,702	81,728,734	12,809,569	4,419,717
10	167,582	84,933,779	16,014,615	5,525,561
12	117,409	87,404,450	18,485,286	6,378,023

* First-year amounts are illustrated. Subsequent-year payments increase at a rate of 20.00% per year.



The illustration above shows the impact of the GRAT term (in years) on the projected results. The graph shows the advantages or disadvantages of a GRAT, as compared to the baseline scenario, in today's dollars. All other assumptions are the same as those listed on the Assumptions schedule.

PlanWiz, LLP



Grantor Retained Annuity Trust

Supporting Schedules for
GRANTOR RETAINED ANNUITY TRUST SCENARIO

AN ANALYSIS PREPARED EXCLUSIVELY FOR

John & Mary Sample

Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

GRAT Illustration - Wealth Transfer Summary

John & Mary Sample

Part 1 of 2

Year Ending In	GRAT Property & Investments				Grantor GRAT-Derived Accumulations		
	GRAT S Corp Stock	Gross Estate Value 65.0%	GRAT Investments	GRAT Unrealized Gains	Grantor S Corp Stock	Gross Estate Value 65.0%	Grantor Investments/-Defunding
2008	4,688,350	3,047,427	0	3,373,859	661,650	430,073	154,250
2009	4,121,657	2,679,077	0	3,041,653	1,602,843	1,041,848	331,900
2010	3,220,601	2,093,391	0	2,431,910	2,904,614	1,887,999	535,617
2011	1,885,834	0	0	1,454,226	4,668,146	3,034,295	750,553
2012	2,017,842	0	54,123	1,586,234	4,994,916	3,246,696	939,380
2013	2,159,091	0	111,951	1,727,483	5,344,560	3,473,964	1,138,323
2014	2,310,228	0	177,571	1,878,620	5,718,680	3,717,142	1,360,421
2015	2,471,944	0	251,787	2,040,336	6,118,987	3,977,342	1,607,931
2016	2,644,980	0	335,479	2,213,372	6,547,316	4,255,756	1,883,318
2017	2,830,128	0	429,606	2,398,520	7,005,628	4,553,658	2,189,262
2018	3,028,237	0	535,217	2,596,629	7,496,022	4,872,415	2,528,685
2019	3,240,214	0	653,454	2,808,606	8,020,744	5,213,484	2,904,766
2020	3,467,029	0	785,563	3,035,421	8,582,196	5,578,427	3,320,964
2021	3,709,721	0	932,903	3,278,113	9,182,950	5,968,917	3,781,043
2022	3,969,401	0	1,096,955	3,537,793	9,825,756	6,386,742	4,289,097
2023	4,247,260	0	1,279,332	3,815,651	10,513,559	6,833,813	4,849,575
2024	4,544,568	0	1,481,791	4,112,960	11,249,508	7,312,180	5,467,317
2025	4,862,687	0	1,706,243	4,431,079	12,036,974	7,824,033	6,147,580
2026	5,203,076	0	1,954,772	4,771,467	12,879,562	8,371,715	6,896,075
2027	5,567,291	0	2,229,641	5,135,683	13,781,131	8,957,735	7,719,008
2028	5,957,001	0	2,533,314	5,525,393	14,745,811	9,584,777	8,623,115
2029	6,373,991	0	2,868,470	5,942,383	15,778,017	10,255,711	9,615,712
2030	6,820,171	0	3,238,020	6,388,563	16,882,479	10,973,611	10,704,739
2031	7,297,583	0	3,645,131	6,865,975	18,064,252	11,741,764	11,898,814
2032	7,808,413	0	4,093,241	7,376,805	19,328,750	12,563,687	13,207,286
2033	8,355,002	0	4,586,086	7,923,394	20,681,762	13,443,145	14,640,297
2034	8,939,853	0	5,127,724	8,508,244	22,129,486	14,384,166	16,208,848
2035	9,565,642	0	5,722,561	9,134,034	23,678,550	15,391,057	17,924,867
2036	10,235,237	0	6,375,379	9,803,629	25,336,048	16,468,431	19,801,287
2037	10,951,704	0	7,091,369	10,520,096	27,109,571	17,621,221	21,852,127
2038	11,718,323	0	7,876,165	11,286,715	29,007,241	18,854,707	24,092,578
2039	12,538,606	0	8,735,877	12,106,998	31,037,748	20,174,536	26,539,106
2040	13,416,308	0	9,677,133	12,984,700	33,210,391	21,586,754	29,209,547
2041	14,355,450	0	10,707,122	13,923,842	35,535,118	23,097,827	32,123,223
2042	15,360,331	0	11,833,637	14,928,723	38,022,576	24,714,675	35,301,061
2043	16,435,554	0	13,065,129	16,003,946	40,684,157	26,444,702	38,765,724

GRAT Illustration - Wealth Transfer Summary

John & Mary Sample

Part 2 of 2

Year Ending In	Net to Heirs				
	GRAT Value +/- Grantor Investments/-Defunding	Gross Estate	Estate Tax	Capital Gains & Medicare Taxes on Trust Property	Net to Heirs
2008	5,504,250	3,631,750	1,634,288	0	3,869,963
2009	6,056,400	4,052,825	1,823,771	0	4,232,629
2010	6,660,832	4,517,007	2,032,653	0	4,628,179
2011	7,304,533	3,784,848	1,703,182	334,472	5,266,880
2012	8,006,262	4,186,075	1,883,734	364,834	5,757,694
2013	8,753,927	4,612,288	2,075,529	462,966	6,215,432
2014	9,566,899	5,077,563	2,284,903	503,470	6,778,526
2015	10,450,649	5,585,273	2,513,373	546,810	7,390,467
2016	11,411,093	6,139,073	2,762,583	593,184	8,055,326
2017	12,454,625	6,742,920	3,034,314	642,803	8,777,508
2018	13,588,162	7,401,099	3,330,495	695,897	9,561,770
2019	14,819,177	8,118,249	3,653,212	752,706	10,413,259
2020	16,155,751	8,899,391	4,004,726	813,493	11,337,533
2021	17,606,616	9,749,960	4,387,482	878,534	12,340,600
2022	19,181,209	10,675,838	4,804,127	948,129	13,428,953
2023	20,889,726	11,683,389	5,257,525	1,022,595	14,609,606
2024	22,743,184	12,779,498	5,750,774	1,102,273	15,890,137
2025	24,753,485	13,971,613	6,287,226	1,187,529	17,278,730
2026	26,933,485	15,267,791	6,870,506	1,278,753	18,784,226
2027	29,297,071	16,676,743	7,504,534	1,376,363	20,416,174
2028	31,859,241	18,207,892	8,193,551	1,480,805	22,184,884
2029	34,636,190	19,871,423	8,942,140	1,592,559	24,101,491
2030	37,645,409	21,678,350	9,755,258	1,712,135	26,178,016
2031	40,905,780	23,640,578	10,638,260	1,840,081	28,427,438
2032	44,437,690	25,770,973	11,596,938	1,976,984	30,863,768
2033	48,263,148	28,083,443	12,637,549	2,123,470	33,502,129
2034	52,405,910	30,593,014	13,766,856	2,280,210	36,358,844
2035	56,891,620	33,315,925	14,992,166	2,447,921	39,451,533
2036	61,747,951	36,269,719	16,321,373	2,627,373	42,799,205
2037	67,004,771	39,473,348	17,763,007	2,819,386	46,422,379
2038	72,694,308	42,947,285	19,326,278	3,024,840	50,343,190
2039	78,851,337	46,713,643	21,021,139	3,244,675	54,585,523
2040	85,513,379	50,796,301	22,858,336	3,479,900	59,175,144
2041	92,720,913	55,221,050	24,849,472	3,731,590	64,139,851
2042	100,517,606	60,015,736	27,007,081	4,000,898	69,509,627
2043	108,950,563	65,210,426	29,344,692	4,289,058	75,316,814

Grantor Retained Annuity Trust - Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

GRAT Illustration - Annuity Payments

John & Mary Sample

Year Ending In	Required Annuity Payment		Source of Annuity Payment			Present Value of Annuity Payments 3.0%
	Annuity Rate	Annuity Payment	Cash from S Corp Stock	GRAT Property Distribution	Undiscounted Value of Property Distribution	
2008	20.92532%	680,073	250,000	430,073	661,650	660,265
2009	25.11038%	816,087	234,417	581,670	894,877	769,241
2010	30.13246%	979,305	206,083	773,222	1,189,572	896,203
2011	36.15895%	1,175,166	161,030	1,014,136	1,560,209	1,044,120

GRAT Illustration - Trust Flows

John & Mary Sample

Part 1 of 2

Year Ending In	S Corp Stock						
	Beginning Property Value	Cash Yield	Growth	Unrealized Gains Distributed	Ending Unrealized Gains	Distribution to Satisfy Annuity	Ending Property Value
2008	5,000,000	250,000	350,000	476,141	3,373,859	661,650	4,688,350
2009	4,688,350	234,417	328,184	660,391	3,041,653	894,877	4,121,657
2010	4,121,657	206,083	288,516	898,259	2,431,910	1,189,572	3,220,601
2011	3,220,601	161,030	225,442	1,203,126	1,454,226	1,560,209	1,885,834
2012	1,885,834	94,292	132,008	0	1,586,234	0	2,017,842
2013	2,017,842	100,892	141,249	0	1,727,483	0	2,159,091
2014	2,159,091	107,955	151,136	0	1,878,620	0	2,310,228
2015	2,310,228	115,511	161,716	0	2,040,336	0	2,471,944
2016	2,471,944	123,597	173,036	0	2,213,372	0	2,644,980
2017	2,644,980	132,249	185,149	0	2,398,520	0	2,830,128
2018	2,830,128	141,506	198,109	0	2,596,629	0	3,028,237
2019	3,028,237	151,412	211,977	0	2,808,606	0	3,240,214
2020	3,240,214	162,011	226,815	0	3,035,421	0	3,467,029
2021	3,467,029	173,351	242,692	0	3,278,113	0	3,709,721
2022	3,709,721	185,486	259,680	0	3,537,793	0	3,969,401
2023	3,969,401	198,470	277,858	0	3,815,651	0	4,247,260
2024	4,247,260	212,363	297,308	0	4,112,960	0	4,544,568
2025	4,544,568	227,228	318,120	0	4,431,079	0	4,862,687
2026	4,862,687	243,134	340,388	0	4,771,467	0	5,203,076
2027	5,203,076	260,154	364,215	0	5,135,683	0	5,567,291
2028	5,567,291	278,365	389,710	0	5,525,393	0	5,957,001
2029	5,957,001	297,850	416,990	0	5,942,383	0	6,373,991
2030	6,373,991	318,700	446,179	0	6,388,563	0	6,820,171
2031	6,820,171	341,009	477,412	0	6,865,975	0	7,297,583
2032	7,297,583	364,879	510,831	0	7,376,805	0	7,808,413
2033	7,808,413	390,421	546,589	0	7,923,394	0	8,355,002
2034	8,355,002	417,750	584,850	0	8,508,244	0	8,939,853
2035	8,939,853	446,993	625,790	0	9,134,034	0	9,565,642
2036	9,565,642	478,282	669,595	0	9,803,629	0	10,235,237
2037	10,235,237	511,762	716,467	0	10,520,096	0	10,951,704
2038	10,951,704	547,585	766,619	0	11,286,715	0	11,718,323
2039	11,718,323	585,916	820,283	0	12,106,998	0	12,538,606
2040	12,538,606	626,930	877,702	0	12,984,700	0	13,416,308
2041	13,416,308	670,815	939,142	0	13,923,842	0	14,355,450
2042	14,355,450	717,772	1,004,881	0	14,928,723	0	15,360,331
2043	15,360,331	768,017	1,075,223	0	16,003,946	0	16,435,554

GRAT Illustration - Trust Flows

John & Mary Sample

Part 2 of 2

Year Ending In	Investments									Total Ending GRAT Value
	Beginning Investment Balance	Current Income 2.0%	Growth 8.0%	Cash from S Corp Stock	Distribution to Satisfy Annuity	Qualified Dividends + Ordinary Income	Income & Medicare Taxes	Capital Gains Tax	Ending Investment Balance	
2008	0	0	0	250,000	250,000	250,000	0	0	0	4,688,350
2009	0	0	0	234,417	234,417	234,417	0	0	0	4,121,657
2010	0	0	0	206,083	206,083	206,083	0	0	0	3,220,601
2011	0	0	0	161,030	161,030	161,030	0	0	0	1,885,834
2012	0	0	0	94,292	0	94,292	40,168	0	54,123	2,071,966
2013	54,123	1,082	4,330	100,892	0	101,975	47,481	996	111,951	2,271,043
2014	111,951	2,239	8,956	107,955	0	110,194	51,470	2,060	177,571	2,487,799
2015	177,571	3,551	14,206	115,511	0	119,063	55,785	3,267	251,787	2,723,731
2016	251,787	5,036	20,143	123,597	0	128,633	60,451	4,633	335,479	2,980,459
2017	335,479	6,710	26,838	132,249	0	138,959	65,497	6,173	429,606	3,259,735
2018	429,606	8,592	34,369	141,506	0	150,099	70,952	7,905	535,217	3,563,454
2019	535,217	10,704	42,817	151,412	0	162,116	76,849	9,848	653,454	3,893,668
2020	653,454	13,069	52,276	162,011	0	175,080	83,224	12,024	785,563	4,252,592
2021	785,563	15,711	62,845	173,351	0	189,063	90,113	14,454	932,903	4,642,624
2022	932,903	18,658	74,632	185,486	0	204,144	97,559	17,165	1,096,955	5,066,356
2023	1,096,955	21,939	87,756	198,470	0	220,409	105,605	20,184	1,279,332	5,526,591
2024	1,279,332	25,587	102,347	212,363	0	237,950	114,298	23,540	1,481,791	6,026,358
2025	1,481,791	29,636	118,543	227,228	0	256,864	123,690	27,265	1,706,243	6,568,931
2026	1,706,243	34,125	136,499	243,134	0	277,259	133,835	31,395	1,954,772	7,157,848
2027	1,954,772	39,095	156,382	260,154	0	299,249	144,794	35,968	2,229,641	7,796,932
2028	2,229,641	44,593	178,371	278,365	0	322,957	156,630	41,025	2,533,314	8,490,315
2029	2,533,314	50,666	202,665	297,850	0	348,516	169,413	46,613	2,868,470	9,242,461
2030	2,868,470	57,369	229,478	318,700	0	376,069	183,216	52,780	3,238,020	10,058,191
2031	3,238,020	64,760	259,042	341,009	0	405,769	198,120	59,580	3,645,131	10,942,713
2032	3,645,131	72,903	291,610	364,879	0	437,782	214,212	67,070	4,093,241	11,901,654
2033	4,093,241	81,865	327,459	390,421	0	472,285	231,584	75,316	4,586,086	12,941,088
2034	4,586,086	91,722	366,887	417,750	0	509,472	250,337	84,384	5,127,724	14,067,576
2035	5,127,724	102,554	410,218	446,993	0	549,547	270,578	94,350	5,722,561	15,288,203
2036	5,722,561	114,451	457,805	478,282	0	592,733	292,425	105,295	6,375,379	16,610,616
2037	6,375,379	127,508	510,030	511,762	0	639,269	316,002	117,307	7,091,369	18,043,073
2038	7,091,369	141,827	567,310	547,585	0	689,413	341,445	130,481	7,876,165	19,594,488
2039	7,876,165	157,523	630,093	585,916	0	743,439	368,899	144,921	8,735,877	21,274,483
2040	8,735,877	174,718	698,870	626,930	0	801,648	398,522	160,740	9,677,133	23,093,441
2041	9,677,133	193,543	774,171	670,815	0	864,358	430,481	178,059	10,707,122	25,062,572
2042	10,707,122	214,142	856,570	717,772	0	931,915	464,958	197,011	11,833,637	27,193,968
2043	11,833,637	236,673	946,691	768,017	0	1,004,689	502,150	217,739	13,065,129	29,500,683

GRAT Illustration - Grantor

John & Mary Sample

Part 1 of 2

Year Ending In	S Corp Stock						
	Beginning Property Value	Cash Yield	Growth	Gains Transferred In	Unrealized Gains	GRAT Annuity Payment	Ending Property Value
2008	0	0	0	476,141	476,141	661,650	661,650
2009	661,650	33,083	46,316	660,391	1,182,847	894,877	1,602,843
2010	1,602,843	80,142	112,199	898,259	2,193,305	1,189,572	2,904,614
2011	2,904,614	145,231	203,323	1,203,126	3,599,754	1,560,209	4,668,146
2012	4,668,146	233,407	326,770	0	3,926,524	0	4,994,916
2013	4,994,916	249,746	349,644	0	4,276,168	0	5,344,560
2014	5,344,560	267,228	374,119	0	4,650,288	0	5,718,680
2015	5,718,680	285,934	400,308	0	5,050,595	0	6,118,987
2016	6,118,987	305,949	428,329	0	5,478,924	0	6,547,316
2017	6,547,316	327,366	458,312	0	5,937,237	0	7,005,628
2018	7,005,628	350,281	490,394	0	6,427,631	0	7,496,022
2019	7,496,022	374,801	524,722	0	6,952,352	0	8,020,744
2020	8,020,744	401,037	561,452	0	7,513,804	0	8,582,196
2021	8,582,196	429,110	600,754	0	8,114,558	0	9,182,950
2022	9,182,950	459,147	642,806	0	8,757,364	0	9,825,756
2023	9,825,756	491,288	687,803	0	9,445,167	0	10,513,559
2024	10,513,559	525,678	735,949	0	10,181,116	0	11,249,508
2025	11,249,508	562,475	787,466	0	10,968,582	0	12,036,974
2026	12,036,974	601,849	842,588	0	11,811,170	0	12,879,562
2027	12,879,562	643,978	901,569	0	12,712,740	0	13,781,131
2028	13,781,131	689,057	964,679	0	13,677,419	0	14,745,811
2029	14,745,811	737,291	1,032,207	0	14,709,625	0	15,778,017
2030	15,778,017	788,901	1,104,461	0	15,814,087	0	16,882,479
2031	16,882,479	844,124	1,181,774	0	16,995,860	0	18,064,252
2032	18,064,252	903,213	1,264,498	0	18,260,358	0	19,328,750
2033	19,328,750	966,437	1,353,012	0	19,613,370	0	20,681,762
2034	20,681,762	1,034,088	1,447,723	0	21,061,094	0	22,129,486
2035	22,129,486	1,106,474	1,549,064	0	22,610,158	0	23,678,550
2036	23,678,550	1,183,927	1,657,498	0	24,267,656	0	25,336,048
2037	25,336,048	1,266,802	1,773,523	0	26,041,180	0	27,109,571
2038	27,109,571	1,355,479	1,897,670	0	27,938,850	0	29,007,241
2039	29,007,241	1,450,362	2,030,507	0	29,969,356	0	31,037,748
2040	31,037,748	1,551,887	2,172,642	0	32,141,999	0	33,210,391
2041	33,210,391	1,660,520	2,324,727	0	34,466,726	0	35,535,118
2042	35,535,118	1,776,756	2,487,458	0	36,954,184	0	38,022,576
2043	38,022,576	1,901,129	2,661,580	0	39,615,765	0	40,684,157

GRAT Illustration - Grantor

John & Mary Sample

Part 2 of 2

Year Ending In	Investments and/or Estate Defunding									Total Combined Value
	Beginning Investment Balance	Current Income 2.0%	Growth 8.0%	Cash from S Corp Stock	GRAT Annuity Payment	Qualified Dividends + Ordinary Income	Income & Medicare Taxes	Capital Gains Tax	Ending Investment Balance	
2008	0	0	0	0	250,000	250,000	95,750	0	154,250	815,900
2009	154,250	3,085	12,340	33,083	234,417	270,585	102,453	2,823	331,900	1,934,743
2010	331,900	6,638	26,552	80,142	206,083	292,863	109,624	6,074	535,617	3,440,231
2011	535,617	10,712	42,849	145,231	161,030	316,973	135,031	9,855	750,553	5,418,699
2012	750,553	15,011	60,044	233,407	0	248,418	105,826	13,810	939,380	5,934,296
2013	939,380	18,788	75,150	249,746	0	268,533	127,455	17,285	1,138,323	6,482,884
2014	1,138,323	22,766	91,066	267,228	0	289,994	138,018	20,945	1,360,421	7,079,100
2015	1,360,421	27,208	108,834	285,934	0	313,142	149,434	25,032	1,607,931	7,726,918
2016	1,607,931	32,159	128,635	305,949	0	338,108	161,770	29,586	1,883,318	8,430,634
2017	1,883,318	37,666	150,665	327,366	0	365,032	175,100	34,653	2,189,262	9,194,890
2018	2,189,262	43,785	175,141	350,281	0	394,067	189,502	40,282	2,528,685	10,024,707
2019	2,528,685	50,574	202,295	374,801	0	425,375	205,061	46,528	2,904,766	10,925,510
2020	2,904,766	58,095	232,381	401,037	0	459,133	221,868	53,448	3,320,964	11,903,160
2021	3,320,964	66,419	265,677	429,110	0	495,529	240,021	61,106	3,781,043	12,963,993
2022	3,781,043	75,621	302,483	459,147	0	534,768	259,627	69,571	4,289,097	14,114,853
2023	4,289,097	85,782	343,128	491,288	0	577,070	280,799	78,919	4,849,575	15,363,135
2024	4,849,575	96,992	387,966	525,678	0	622,669	303,661	89,232	5,467,317	16,716,826
2025	5,467,317	109,346	437,385	562,475	0	671,822	328,346	100,599	6,147,580	18,184,554
2026	6,147,580	122,952	491,806	601,849	0	724,800	354,996	113,115	6,896,075	19,775,637
2027	6,896,075	137,922	551,686	643,978	0	781,900	383,765	126,888	7,719,008	21,500,139
2028	7,719,008	154,380	617,521	689,057	0	843,437	414,820	142,030	8,623,115	23,368,925
2029	8,623,115	172,462	689,849	737,291	0	909,753	448,340	158,665	9,615,712	25,393,729
2030	9,615,712	192,314	769,257	788,901	0	981,215	484,516	176,929	10,704,739	27,587,218
2031	10,704,739	214,095	856,379	844,124	0	1,058,219	523,556	196,967	11,898,814	29,963,066
2032	11,898,814	237,976	951,905	903,213	0	1,141,189	565,684	218,938	13,207,286	32,536,036
2033	13,207,286	264,146	1,056,583	966,437	0	1,230,583	611,141	243,014	14,640,297	35,322,059
2034	14,640,297	292,806	1,171,224	1,034,088	0	1,326,894	660,185	269,381	16,208,848	38,338,334
2035	16,208,848	324,177	1,296,708	1,106,474	0	1,430,651	713,097	298,243	17,924,867	41,603,417
2036	17,924,867	358,497	1,433,989	1,183,927	0	1,542,425	770,177	329,818	19,801,287	45,137,335
2037	19,801,287	396,026	1,584,103	1,266,802	0	1,662,828	831,748	364,344	21,852,127	48,961,698
2038	21,852,127	437,043	1,748,170	1,355,479	0	1,792,521	898,160	402,079	24,092,578	53,099,820
2039	24,092,578	481,852	1,927,406	1,450,362	0	1,932,214	969,789	443,303	26,539,106	57,576,855
2040	26,539,106	530,782	2,123,129	1,551,887	0	2,082,670	1,047,038	488,320	29,209,547	62,419,938
2041	29,209,547	584,191	2,336,764	1,660,520	0	2,244,710	1,130,343	537,456	32,123,223	67,658,341
2042	32,123,223	642,464	2,569,858	1,776,756	0	2,419,220	1,220,173	591,067	35,301,061	73,323,638
2043	35,301,061	706,021	2,824,085	1,901,129	0	2,607,150	1,317,033	649,540	38,765,724	79,449,880



Grantor Retained Annuity Trust

Supporting Schedules for
TAX RATES

AN ANALYSIS PREPARED EXCLUSIVELY FOR

John & Mary Sample

Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

Grantor Retained Annuity Trust - Transfer \$5MM ShopRight, Inc. to 4-Year GRAT

Tax Rates

John & Mary Sample

Year Ending In	John					Transferee				
	Federal Ordinary Income Tax Rate	Effective State Income Tax Rate 5.0%	Combined Ordinary Income Tax Rate	Combined Capital Gains Tax Rate	Estate Tax Rate	Federal Ordinary Income Tax Rate	Effective State Income Tax Rate 5.0%	Combined Ordinary Income Tax Rate	Combined Capital Gains Tax Rate	
2008	35.0%	3.3%	38.3%	18.3%	45.0%	35.0%	3.3%	38.3%	18.3%	
2009	35.0%	3.3%	38.3%	18.3%	45.0%	35.0%	3.3%	38.3%	18.3%	
2010	35.0%	3.3%	38.3%	18.3%	45.0%	35.0%	3.3%	38.3%	18.3%	
2011	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2012	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2013	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2014	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2015	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2016	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2017	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2018	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2019	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2020	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2021	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2022	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2023	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2024	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2025	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2026	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2027	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2028	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2029	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2030	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2031	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2032	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2033	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2034	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2035	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2036	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2037	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2038	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2039	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2040	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2041	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2042	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2043	39.6%	3.0%	42.6%	23.0%	45.0%	39.6%	3.0%	42.6%	23.0%	



Sale to Grantor Trust

An Illustration of the Use of a Sale of Appreciating
Property to a Grantor Trust

AN ANALYSIS PREPARED EXCLUSIVELY FOR

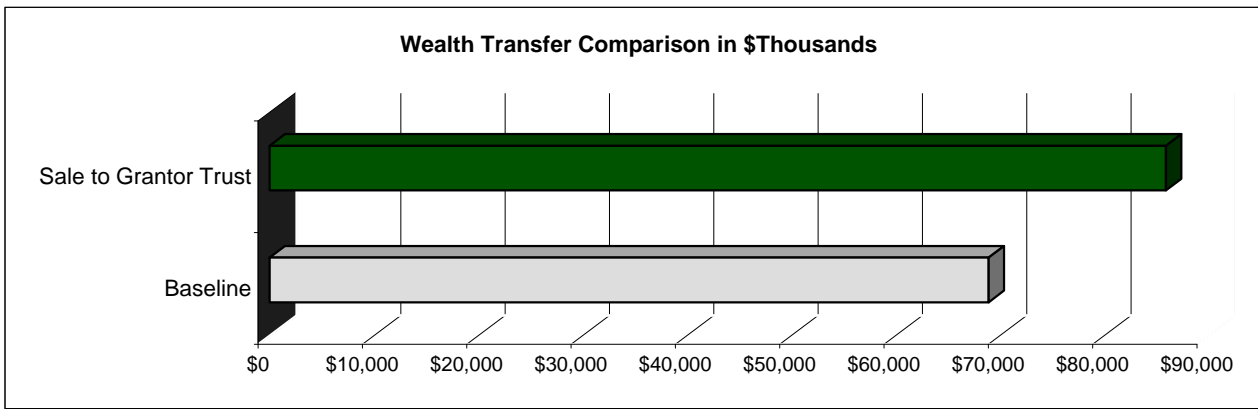
John & Mary Sample

Gift & Sell \$5MM ShopRight, Inc. to IDGT for 9-Year Balloon Note

Summary

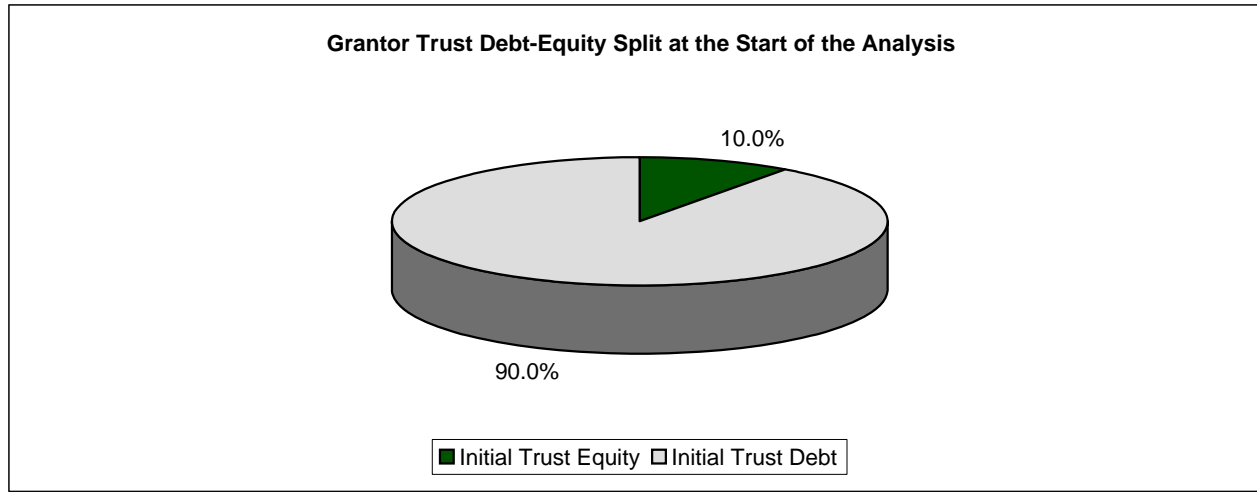
John & Mary Sample

At John's Death in 2043	Baseline	Sale to Grantor Trust
Taxable gift	NA	325,000
Value of grantor trust at the end of 9 years in 2016	NA	8,285,212
Grantor's trust-related accumulations/-estate depletion	108,950,563	22,954,084
Total transferable value in 2043	108,950,563	108,950,563
Estate taxes or tax savings	-40,031,399	-9,587,839
Deferred capital gains and Medicare taxes	0	-13,435,170
Net amount to 2nd generation	68,919,164	85,927,554
Planning advantage/-disadvantage to 2nd generation		17,008,390
Present value of advantage/-disadvantage @ 3.0%		5,868,446



Transaction Summary

John & Mary Sample



Transaction Summary	
Undiscounted value of property sold	4,500,000
Gift tax valuation discount	-1,575,000
Discounted value of property sold/face amount of note	2,925,000
Target percentage of trust equity	10.0%
Target equity	325,000
Less: Current value of existing trust property	0
Total taxable gift	325,000
Undiscounted value of property used to seed the trust	500,000

Assumptions

John & Mary Sample

Personal	John	Mary
Age	54.0	51.0
Calculated life expectancy	85.4	85.2
Life expectancy override	90.0	90.0
Year of death	2043	2046
Post-1976 adjusted taxable gifts	0	0
Unified credit used	0	0
Planning Illustration		
Transfer date		01-Jan-2008
Tax laws to apply - EGTRRA 2001	New law provisions sunset after 2010	
Tax laws to apply - JGTRRA 2003	New law provisions sunset after 2010	
Tax laws to apply - estate, gift & GST	2009 tax rates and exemptions apply indefinitely	
Transferor	John	
Gift-splitting	Yes	
If Yes, adjust estate tax for consenting spouse's share	Yes	
Note term	9 years	
Planning term	Transferor's life expectancy	
Interest rate on note	3.50%	
Amortization of note	Balloon	
Excess trust cash flows are first applied to . . .	Debt service	
Property Transferred		
Undiscounted value of property sold	4,500,000	
Basis of property sold	1,350,000	
Type of property sold	S corp	
Gift tax valuation discount	35.0%	
Estate tax valuation discount	35.0%	
Apply estate tax valuation discount in baseline scenario	Yes	
Target percentage of trust equity	10.0%	
Target percentage is based on which value	Total value transferred	
Face amount of note	2,925,000	
Type of property used to seed trust	S corp	
Value of property used to seed trust	500,000	
Value of taxable gift associated with seeding the trust	325,000	

Sale to Grantor Trust - Gift & Sell \$5MM ShopRight, Inc. to IDGT for 9-Year Balloon Note

Assumptions

John & Mary Sample

Sale of Trust Property

Trust sale during note term	No
Grantor tax reimbursement	NA
Reduce tax reimbursement by debt service payments	NA

Tax Rates

	John	Transferee
Federal tax bracket	See schedule	See schedule
Federal capital gains tax rate	See schedule	See schedule
State income tax rate	5.0%	5.0%
Estate tax rate	See schedule	NA
IRD deduction rate	See schedule	0.0%

Investment Rates

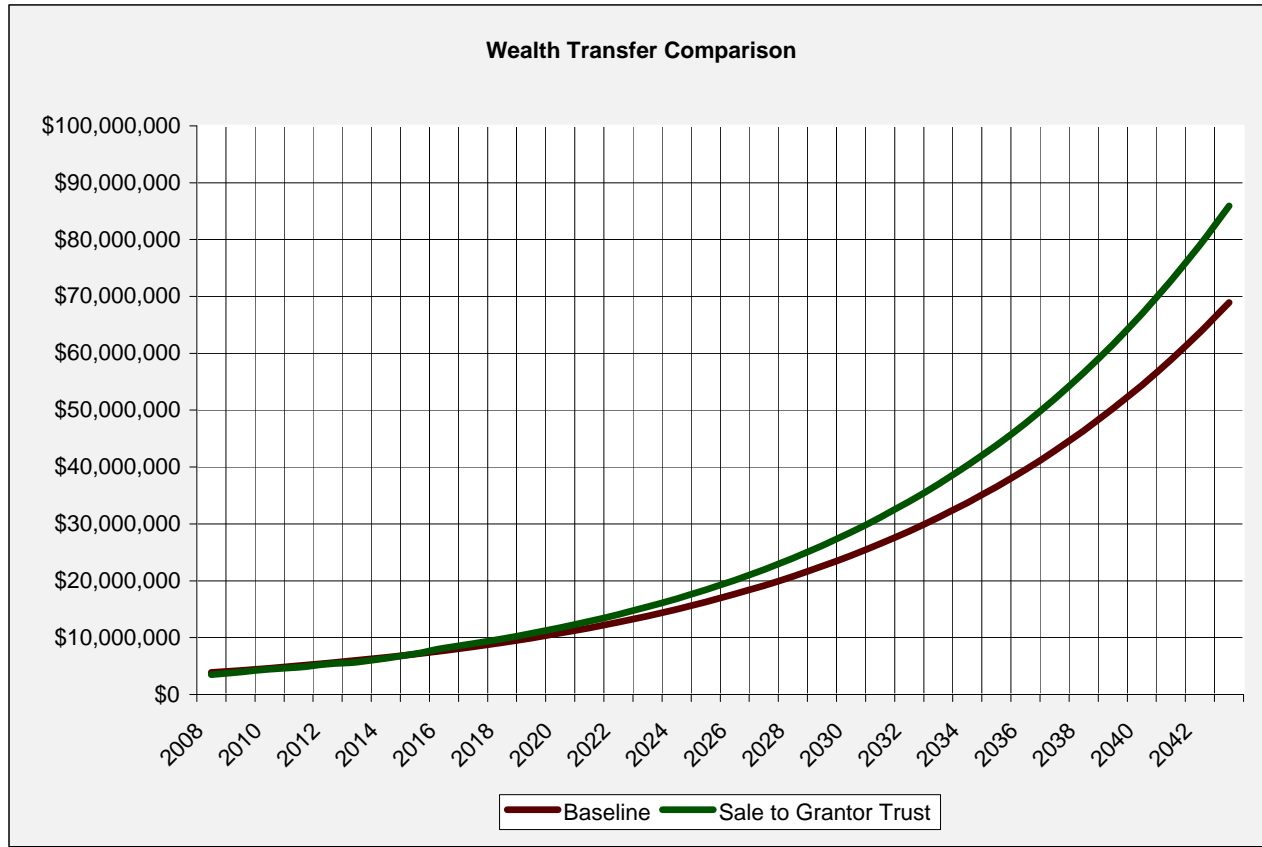
	S corp	Other
Current cash yield	5.0%	2.0%
Inc/-dec rate of cash yield	0.0%	NA
Tax yield multiple	100.0%	NA
Qualified dividend percentage	0.0%	100.0%
Base growth rate	7.0%	8.0%
Percentage of taxable income and realized gains subject to Medicare surtax	100.0%	100.0%
Present value discount rate	NA	3.0%
Inflation rate	NA	3.0%

Other

Property distributions from the trust are grossed up for valuation discounts	Yes
Maintain grantor trust status after note term	No
Grantor's premature death triggers taxes	Heirs
Summary results are shown net of deferred capital gains and Medicare taxes	Yes

Annual Net to Heirs Comparison

John & Mary Sample



The illustration above compares an installment sale to a grantor trust to the baseline over the planning horizon.

Sale to Grantor Trust - Gift & Sell \$5MM ShopRight, Inc. to IDGT for 9-Year Balloon Note

Annual Net to Heirs Comparison

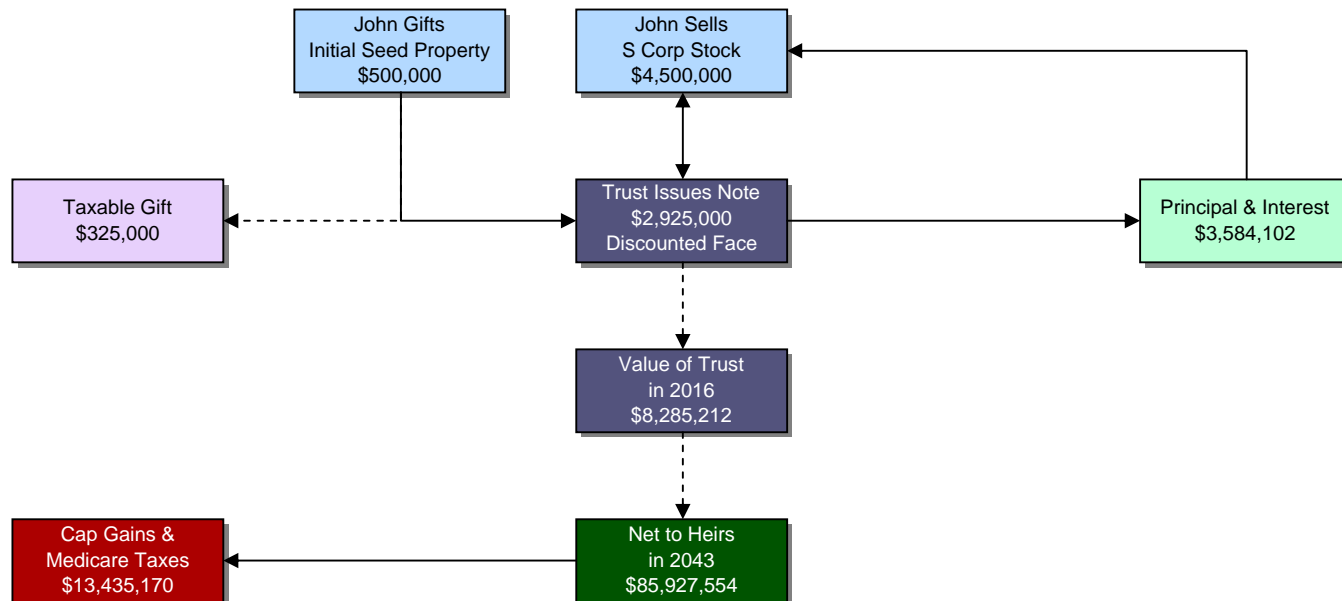
John & Mary Sample

Year Ending In	Net to Heirs		Comparison	
	Baseline Scenario	Sale to Grantor Trust Scenario	Projected Sale to Grantor Trust Adv/-Disadv	Present Value Sale to Trust Adv/-Disadv 3.0%
2008	3,869,963	3,466,486	-403,477	-391,725
2009	4,232,629	3,926,519	-306,110	-288,538
2010	4,628,179	4,431,724	-196,455	-179,784
2011	5,049,745	4,755,938	-293,808	-261,045
2012	5,507,953	5,324,004	-183,950	-158,677
2013	5,996,485	5,711,492	-284,993	-238,677
2014	6,526,347	6,376,139	-150,208	-122,133
2015	7,100,929	7,124,047	23,119	18,250
2016	7,723,888	8,142,957	419,069	321,181
2017	8,399,176	8,932,373	533,198	396,749
2018	9,131,060	9,793,298	662,238	478,415
2019	9,924,148	10,731,861	807,713	566,514
2020	10,783,416	11,754,702	971,286	661,399
2021	11,714,235	12,869,007	1,154,773	763,441
2022	12,722,402	14,082,555	1,360,153	873,030
2023	13,814,178	15,403,764	1,589,586	990,577
2024	14,996,318	16,841,744	1,845,426	1,116,513
2025	16,276,113	18,406,352	2,130,239	1,251,291
2026	17,661,432	20,108,251	2,446,818	1,395,386
2027	19,160,766	21,958,974	2,798,209	1,549,300
2028	20,783,275	23,970,997	3,187,722	1,713,558
2029	22,538,846	26,157,811	3,618,965	1,888,711
2030	24,438,142	28,534,002	4,095,860	2,075,338
2031	26,492,668	31,115,341	4,622,674	2,274,049
2032	28,714,833	33,918,880	5,204,047	2,485,482
2033	31,118,022	36,963,046	5,845,024	2,710,307
2034	33,716,671	40,267,758	6,551,087	2,949,228
2035	36,526,351	43,854,543	7,328,192	3,202,982
2036	39,563,851	47,746,660	8,182,809	3,472,345
2037	42,847,275	51,969,242	9,121,967	3,758,130
2038	46,396,146	56,549,442	10,153,296	4,061,188
2039	50,231,511	61,516,589	11,285,078	4,382,414
2040	54,376,064	66,902,367	12,526,303	4,722,745
2041	58,854,266	72,740,992	13,886,726	5,083,165
2042	63,692,491	79,069,420	15,376,929	5,464,705
2043	68,919,164	85,927,554	17,008,390	5,868,446

Sale to Grantor Trust Illustration - 2nd Generation Transfer

John & Mary Sample

Assuming a 9-Year Balloon Note and No Sale of Transferred Property during the Note Term



Assuming the transferred property is sold following John's death, the use of an installment sale to a grantor trust in this manner is projected to produce a net after-tax benefit of \$17,008,390, or \$5,868,446 in today's dollars.

If, however, the property is not sold, the projected benefit of an installment sale to a grantor trust would be \$30,443,560, or \$10,504,015 in today's dollars.



Sale to Grantor Trust

Sensitivity Analyses

AN ANALYSIS PREPARED EXCLUSIVELY FOR

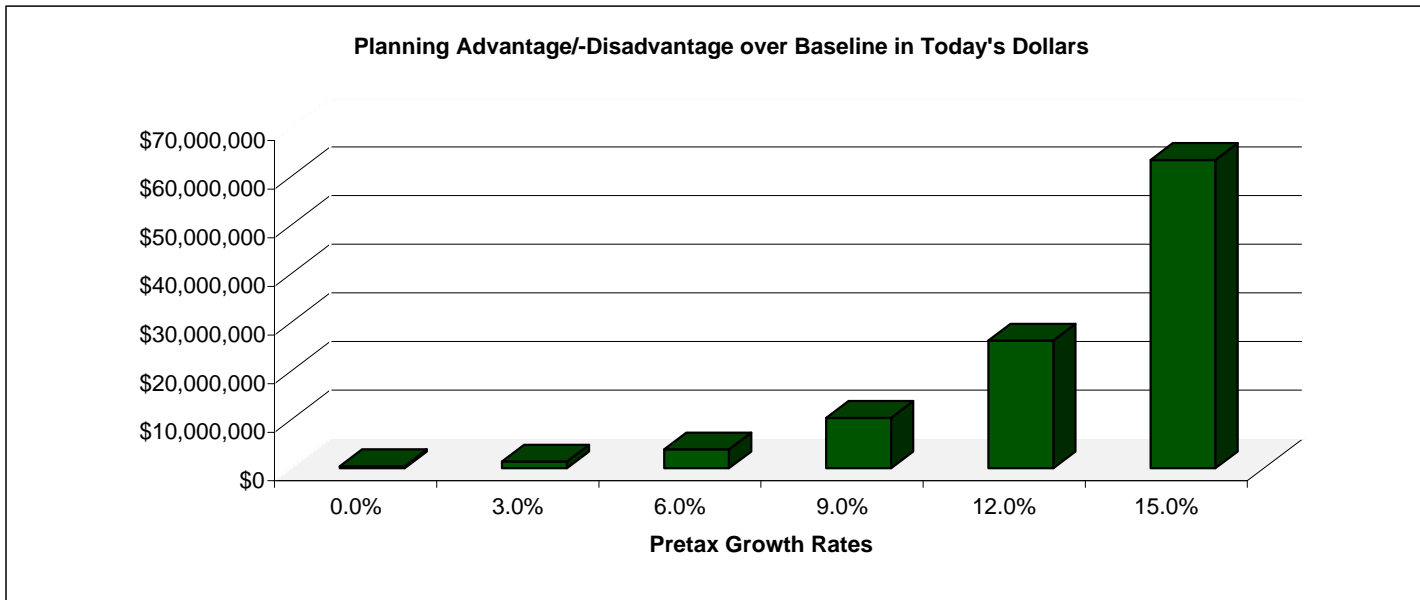
John & Mary Sample

Gift & Sell \$5MM ShopRight, Inc. to IDGT for 9-Year Balloon Note

Sensitivity Analysis - Growth Rates

John & Mary Sample

2043 Growth	Net to Heirs		Comparison to Baseline	
	Baseline	Sale to Grantor Trust	Projected Adv/-Disadv	PV of Adv/-Disadv
0.0%	6,819,974	8,044,696	1,224,722	422,569
3.0%	18,212,768	22,162,913	3,950,144	1,362,928
6.0%	47,820,748	59,076,684	11,255,936	3,883,663
9.0%	123,360,074	153,389,632	30,029,558	10,361,171
12.0%	312,496,739	388,537,496	76,040,757	26,236,527
15.0%	777,197,277	960,882,723	183,685,446	63,377,435

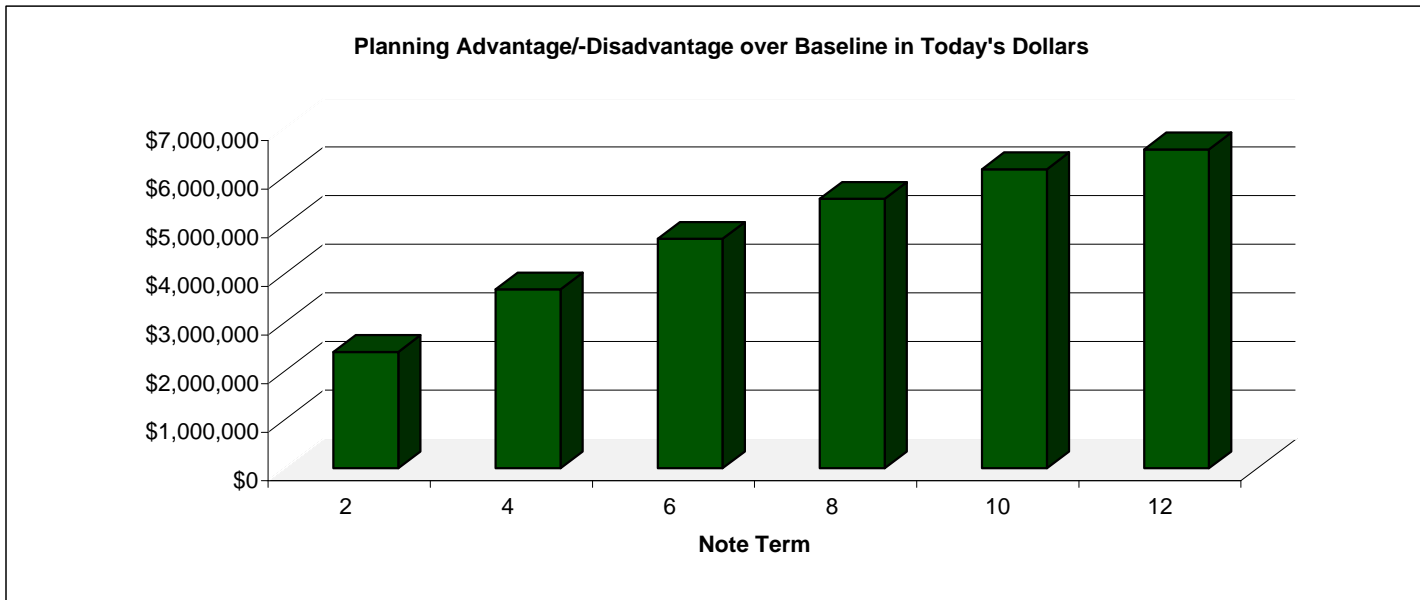


The illustration above shows the impact of pretax growth rate assumptions on the projected results. The graph shows the advantages/-disadvantages of a sale to a grantor trust, as compared to the baseline scenario in today's dollars. All other assumptions are the same as those listed on the Assumptions schedule.

Sensitivity Analysis - Note Term

John & Mary Sample

2043 Note Term	Sale to Grantor Trust Summary		Comparison to Baseline	
	Total Interest	Net to Heirs	Projected Adv/-Disadv	PV of Adv/-Disadv
2	199,583	75,849,843	6,930,679	2,391,309
4	375,255	79,575,701	10,656,537	3,676,851
6	519,787	82,593,367	13,674,203	4,718,043
8	624,637	84,970,214	16,051,050	5,538,133
10	679,738	86,739,544	17,820,379	6,148,609
12	685,010	87,918,231	18,999,067	6,555,294



The illustration above shows the impact of the note term (in years) on the projected results. The graph shows the advantages/-disadvantages of a sale to a grantor trust, as compared to the baseline scenario, in today's dollars. All other assumptions are the same as those listed on the Assumptions schedule.



Sale to Grantor Trust

Supporting Schedules for
SALE TO GRANTOR TRUST SCENARIO

AN ANALYSIS PREPARED EXCLUSIVELY FOR

John & Mary Sample

Gift & Sell \$5MM ShopRight, Inc. to IDGT for 9-Year Balloon Note

Sale to Grantor Trust Illustration - Wealth Transfer Summary

John & Mary Sample

Part 1 of 2

Year Ending In	Trust Property & Investments						Grantor Trust-Derived Accumulations		
	Trust S Corp Stock	Trust Investments	Trust Unrealized Gains	Note Face Amount	Combined Net Trust Value	Gross Estate Value	Grantor S Corp Stock	Gross Estate Value 65.0%	Grantor Investments/-Defunding
2008	5,350,000	0	3,850,000	2,777,375	2,572,625	2,777,375	0	0	154,250
2009	5,724,500	0	4,224,500	2,607,083	3,117,417	2,607,083	0	0	331,900
2010	6,125,215	0	4,625,215	2,412,106	3,713,109	2,412,106	0	0	535,617
2011	6,553,980	0	5,053,980	2,190,269	4,363,711	2,190,269	0	0	750,553
2012	7,012,759	0	5,512,759	1,939,229	5,073,529	1,939,229	0	0	993,503
2013	7,503,652	0	6,003,652	1,656,465	5,847,187	1,656,465	0	0	1,250,275
2014	8,028,907	0	6,528,907	1,339,258	6,689,649	1,339,258	0	0	1,537,992
2015	8,590,931	0	7,090,931	984,687	7,606,244	984,687	0	0	1,859,718
2016	8,285,212	0	6,933,230	0	8,285,212	0	907,084	589,604	2,218,797
2017	8,865,177	222,044	7,513,195	0	9,087,221	0	970,579	630,877	2,396,825
2018	9,485,740	475,014	8,133,758	0	9,960,753	0	1,038,520	675,038	2,588,888
2019	10,149,742	762,140	8,797,760	0	10,911,882	0	1,111,216	722,291	2,796,079
2020	10,860,223	1,086,955	9,508,241	0	11,947,178	0	1,189,002	772,851	3,019,572
2021	11,620,439	1,453,313	10,268,457	0	13,073,752	0	1,272,232	826,951	3,260,633
2022	12,433,870	1,865,426	11,081,888	0	14,299,296	0	1,361,288	884,837	3,520,625
2023	13,304,241	2,327,890	11,952,259	0	15,632,131	0	1,456,578	946,776	3,801,017
2024	14,235,538	2,845,720	12,883,556	0	17,081,258	0	1,558,538	1,013,050	4,103,388
2025	15,232,025	3,424,384	13,880,043	0	18,656,409	0	1,667,636	1,083,964	4,429,439
2026	16,298,267	4,069,844	14,946,285	0	20,368,111	0	1,784,371	1,159,841	4,781,003
2027	17,439,146	4,788,596	16,087,164	0	22,227,742	0	1,909,277	1,241,030	5,160,052
2028	18,659,886	5,587,719	17,307,904	0	24,247,605	0	2,042,926	1,327,902	5,568,709
2029	19,966,078	6,474,921	18,614,096	0	26,440,999	0	2,185,931	1,420,855	6,009,260
2030	21,363,703	7,458,595	20,011,721	0	28,822,298	0	2,338,946	1,520,315	6,484,165
2031	22,859,163	8,547,874	21,507,181	0	31,407,036	0	2,502,672	1,626,737	6,996,071
2032	24,459,304	9,752,696	23,107,322	0	34,212,000	0	2,677,859	1,740,609	7,547,831
2033	26,171,455	11,083,872	24,819,473	0	37,255,327	0	2,865,309	1,862,451	8,142,511
2034	28,003,457	12,553,158	26,651,475	0	40,556,615	0	3,065,881	1,992,823	8,783,414
2035	29,963,699	14,173,333	28,611,717	0	44,137,032	0	3,280,493	2,132,320	9,474,095
2036	32,061,158	15,958,289	30,709,176	0	48,019,447	0	3,510,127	2,281,583	10,218,377
2037	34,305,439	17,923,118	32,953,457	0	52,228,557	0	3,755,836	2,441,294	11,020,378
2038	36,706,820	20,084,217	35,354,838	0	56,791,037	0	4,018,745	2,612,184	11,884,526
2039	39,276,297	22,459,395	37,924,315	0	61,735,692	0	4,300,057	2,795,037	12,815,589
2040	42,025,638	25,067,986	40,673,656	0	67,093,624	0	4,601,061	2,990,690	13,818,694
2041	44,967,433	27,930,983	43,615,451	0	72,898,416	0	4,923,135	3,200,038	14,899,362
2042	48,115,153	31,071,169	46,763,171	0	79,186,322	0	5,267,755	3,424,040	16,063,529
2043	51,483,214	34,513,266	50,131,232	0	85,996,479	0	5,636,497	3,663,723	17,317,587

Sale to Grantor Trust Illustration - Wealth Transfer Summary

John & Mary Sample

Part 2 of 2

Year Ending In	Transfer to Heirs							
	Total Transferable Value	Gross Estate	Trust Taxable Gift	Estate Tax Base	Estate Tax	Present Value of Taxes Associated with Early Death	Capital Gains & Medicare Taxes on Trust Property	Net to Heirs
2008	5,504,250	2,931,625	325,000	3,256,625	1,465,481	101,493	470,790	3,466,486
2009	6,056,400	2,938,983	325,000	3,263,983	1,468,792	90,601	570,487	3,926,519
2010	6,660,832	2,947,723	325,000	3,272,723	1,472,725	76,884	679,499	4,431,724
2011	7,304,533	2,940,822	325,000	3,265,822	1,469,620	75,322	1,003,654	4,755,938
2012	8,006,262	2,932,732	325,000	3,257,732	1,465,980	49,367	1,166,912	5,324,004
2013	8,753,927	2,906,739	325,000	3,231,739	1,454,283	21,106	1,567,046	5,711,492
2014	9,566,899	2,877,250	325,000	3,202,250	1,441,012	0	1,749,747	6,376,139
2015	10,450,649	2,844,405	325,000	3,169,405	1,426,232	0	1,900,369	7,124,047
2016	11,411,093	2,808,401	325,000	3,133,401	1,410,030	0	1,858,106	8,142,957
2017	12,454,625	3,027,701	325,000	3,352,701	1,508,716	0	2,013,536	8,932,373
2018	13,588,162	3,263,926	325,000	3,588,926	1,615,017	0	2,179,847	9,793,298
2019	14,819,177	3,518,370	325,000	3,843,370	1,729,516	0	2,357,800	10,731,861
2020	16,155,751	3,792,423	325,000	4,117,423	1,852,840	0	2,548,209	11,754,702
2021	17,606,616	4,087,584	325,000	4,412,584	1,985,663	0	2,751,947	12,869,007
2022	19,181,209	4,405,463	325,000	4,730,463	2,128,708	0	2,969,946	14,082,555
2023	20,889,726	4,747,793	325,000	5,072,793	2,282,757	0	3,203,205	15,403,764
2024	22,743,184	5,116,438	325,000	5,441,438	2,448,647	0	3,452,793	16,841,744
2025	24,753,485	5,513,403	325,000	5,838,403	2,627,281	0	3,719,852	18,406,352
2026	26,933,485	5,940,844	325,000	6,265,844	2,819,630	0	4,005,604	20,108,251
2027	29,297,071	6,401,082	325,000	6,726,082	3,026,737	0	4,311,360	21,958,974
2028	31,859,241	6,896,611	325,000	7,221,611	3,249,725	0	4,638,518	23,970,997
2029	34,636,190	7,430,115	325,000	7,755,115	3,489,802	0	4,988,578	26,157,811
2030	37,645,409	8,004,479	325,000	8,329,479	3,748,266	0	5,363,141	28,534,002
2031	40,905,780	8,622,808	325,000	8,947,808	4,026,514	0	5,763,924	31,115,341
2032	44,437,690	9,288,439	325,000	9,613,439	4,326,048	0	6,192,762	33,918,880
2033	48,263,148	10,004,962	325,000	10,329,962	4,648,483	0	6,651,619	36,963,046
2034	52,405,910	10,776,237	325,000	11,101,237	4,995,557	0	7,142,595	40,267,758
2035	56,891,620	11,606,415	325,000	11,931,415	5,369,137	0	7,667,940	43,854,543
2036	61,747,951	12,499,960	325,000	12,824,960	5,771,232	0	8,230,059	47,746,660
2037	67,004,771	13,461,672	325,000	13,786,672	6,204,002	0	8,831,526	51,969,242
2038	72,694,308	14,496,710	325,000	14,821,710	6,669,770	0	9,475,097	56,549,442
2039	78,851,337	15,610,626	325,000	15,935,626	7,171,032	0	10,163,716	61,516,589
2040	85,513,379	16,809,384	325,000	17,134,384	7,710,473	0	10,900,540	66,902,367
2041	92,720,913	18,099,400	325,000	18,424,400	8,290,980	0	11,688,941	72,740,992
2042	100,517,606	19,487,570	325,000	19,812,570	8,915,656	0	12,532,530	79,069,420
2043	108,950,563	20,981,310	325,000	21,306,310	9,587,839	0	13,435,170	85,927,554

Sale to Grantor Trust - Gift & Sell \$5MM ShopRight, Inc. to IDGT for 9-Year Balloon Note

Sale to Grantor Trust Illustration - Note Amortization & Debt Service

John & Mary Sample

Year Ending In	Original Note Face Amount = \$2,925,000							Source of Note Payments			
	Interest 3.50%	Scheduled Principal	Additional Principal	Total Principal	Total Planned Payment	Total Actual Payment	Outstanding Note Balance	Cash from S Corp Stock	Trust Property Distribution	Undiscounted Value of Property Distribution	Present Value of Note Payments 3.0%
2008	102,375	0	147,625	147,625	250,000	250,000	2,777,375	250,000	0	0	242,718
2009	97,208	0	170,292	170,292	267,500	267,500	2,607,083	267,500	0	0	252,144
2010	91,248	0	194,977	194,977	286,225	286,225	2,412,106	286,225	0	0	261,936
2011	84,424	0	221,837	221,837	306,261	306,261	2,190,269	306,261	0	0	272,109
2012	76,659	0	251,040	251,040	327,699	327,699	1,939,229	327,699	0	0	282,676
2013	67,873	0	282,765	282,765	350,638	350,638	1,656,465	350,638	0	0	293,654
2014	57,976	0	317,206	317,206	375,183	375,183	1,339,258	375,183	0	0	305,058
2015	46,874	0	354,571	354,571	401,445	401,445	984,687	401,445	0	0	316,905
2016	34,464	984,687	0	984,687	1,019,151	1,019,151	0	429,547	589,604	907,084	781,094

Sale to Grantor Trust Illustration - Grantor Trust Flows

John & Mary Sample

Part 1 of 2

Year Ending In	S Corp Stock						
	Beginning Property Value	Cash Yield	Growth	Unrealized Gains Distributed	Ending Unrealized Gains	Distribution to Satisfy Debt Service	Ending Property Value
Start	5,000,000				3,500,000		
2008	5,000,000	250,000	350,000	0	3,850,000	0	5,350,000
2009	5,350,000	267,500	374,500	0	4,224,500	0	5,724,500
2010	5,724,500	286,225	400,715	0	4,625,215	0	6,125,215
2011	6,125,215	306,261	428,765	0	5,053,980	0	6,553,980
2012	6,553,980	327,699	458,779	0	5,512,759	0	7,012,759
2013	7,012,759	350,638	490,893	0	6,003,652	0	7,503,652
2014	7,503,652	375,183	525,256	0	6,528,907	0	8,028,907
2015	8,028,907	401,445	562,024	0	7,090,931	0	8,590,931
2016	8,590,931	429,547	601,365	759,066	6,933,230	907,084	8,285,212
2017	8,285,212	414,261	579,965	0	7,513,195	0	8,865,177
2018	8,865,177	443,259	620,562	0	8,133,758	0	9,485,740
2019	9,485,740	474,287	664,002	0	8,797,760	0	10,149,742
2020	10,149,742	507,487	710,482	0	9,508,241	0	10,860,223
2021	10,860,223	543,011	760,216	0	10,268,457	0	11,620,439
2022	11,620,439	581,022	813,431	0	11,081,888	0	12,433,870
2023	12,433,870	621,693	870,371	0	11,952,259	0	13,304,241
2024	13,304,241	665,212	931,297	0	12,883,556	0	14,235,538
2025	14,235,538	711,777	996,488	0	13,880,043	0	15,232,025
2026	15,232,025	761,601	1,066,242	0	14,946,285	0	16,298,267
2027	16,298,267	814,913	1,140,879	0	16,087,164	0	17,439,146
2028	17,439,146	871,957	1,220,740	0	17,307,904	0	18,659,886
2029	18,659,886	932,994	1,306,192	0	18,614,096	0	19,966,078
2030	19,966,078	998,304	1,397,625	0	20,011,721	0	21,363,703
2031	21,363,703	1,068,185	1,495,459	0	21,507,181	0	22,859,163
2032	22,859,163	1,142,958	1,600,141	0	23,107,322	0	24,459,304
2033	24,459,304	1,222,965	1,712,151	0	24,819,473	0	26,171,455
2034	26,171,455	1,308,573	1,832,002	0	26,651,475	0	28,003,457
2035	28,003,457	1,400,173	1,960,242	0	28,611,717	0	29,963,699
2036	29,963,699	1,498,185	2,097,459	0	30,709,176	0	32,061,158
2037	32,061,158	1,603,058	2,244,281	0	32,953,457	0	34,305,439
2038	34,305,439	1,715,272	2,401,381	0	35,354,838	0	36,706,820
2039	36,706,820	1,835,341	2,569,477	0	37,924,315	0	39,276,297
2040	39,276,297	1,963,815	2,749,341	0	40,673,656	0	42,025,638
2041	42,025,638	2,101,282	2,941,795	0	43,615,451	0	44,967,433
2042	44,967,433	2,248,372	3,147,720	0	46,763,171	0	48,115,153
2043	48,115,153	2,405,758	3,368,061	0	50,131,232	0	51,483,214

Sale to Grantor Trust Illustration - Grantor Trust Flows

John & Mary Sample

Part 2 of 2

Year Ending In	Investments									Outstanding Note Balance	Total Ending Trust Value	
	Beginning Investment Balance	Current Income 2.0%	Growth 8.0%	Cash from S Corp Stock	Distribution to Satisfy Debt Service	Qualified Dividends + Ordinary Income	& Medicare Taxes	Capital Gains Tax	Ending Investment Balance			
Start	0									0	2,925,000	2,075,000
2008	0	0	0	250,000	250,000	250,000	0	0	0	0	2,777,375	2,572,625
2009	0	0	0	267,500	267,500	267,500	0	0	0	0	2,607,083	3,117,417
2010	0	0	0	286,225	286,225	286,225	0	0	0	0	2,412,106	3,713,109
2011	0	0	0	306,261	306,261	306,261	0	0	0	0	2,190,269	4,363,711
2012	0	0	0	327,699	327,699	327,699	0	0	0	0	1,939,229	5,073,529
2013	0	0	0	350,638	350,638	350,638	0	0	0	0	1,656,465	5,847,187
2014	0	0	0	375,183	375,183	375,183	0	0	0	0	1,339,258	6,689,649
2015	0	0	0	401,445	401,445	401,445	0	0	0	0	984,687	7,606,244
2016	0	0	0	429,547	429,547	429,547	0	0	0	0	0	8,285,212
2017	0	0	0	414,261	0	414,261	192,217	0	222,044	0	0	9,087,221
2018	222,044	4,441	17,763	443,259	0	447,700	208,408	4,086	475,014	0	0	9,960,753
2019	475,014	9,500	38,001	474,287	0	483,787	225,921	8,740	762,140	0	0	10,911,882
2020	762,140	15,243	60,971	507,487	0	522,730	244,864	14,023	1,086,955	0	0	11,947,178
2021	1,086,955	21,739	86,956	543,011	0	564,750	265,348	20,000	1,453,313	0	0	13,073,752
2022	1,453,313	29,066	116,265	581,022	0	610,088	287,499	26,741	1,865,426	0	0	14,299,296
2023	1,865,426	37,309	149,234	621,693	0	659,002	311,448	34,324	2,327,890	0	0	15,632,131
2024	2,327,890	46,558	186,231	665,212	0	711,770	337,338	42,833	2,845,720	0	0	17,081,258
2025	2,845,720	56,914	227,658	711,777	0	768,691	365,324	52,361	3,424,384	0	0	18,656,409
2026	3,424,384	68,488	273,951	761,601	0	830,089	395,571	63,009	4,069,844	0	0	20,368,111
2027	4,069,844	81,397	325,588	814,913	0	896,310	428,260	74,885	4,788,596	0	0	22,227,742
2028	4,788,596	95,772	383,088	871,957	0	967,729	463,584	88,110	5,587,719	0	0	24,247,605
2029	5,587,719	111,754	447,018	932,994	0	1,044,749	501,750	102,814	6,474,921	0	0	26,440,999
2030	6,474,921	129,498	517,994	998,304	0	1,127,802	542,984	119,139	7,458,595	0	0	28,822,298
2031	7,458,595	149,172	596,688	1,068,185	0	1,217,357	587,528	137,238	8,547,874	0	0	31,407,036
2032	8,547,874	170,957	683,830	1,142,958	0	1,313,916	635,642	157,281	9,752,696	0	0	34,212,000
2033	9,752,696	195,054	780,216	1,222,965	0	1,418,019	687,609	179,450	11,083,872	0	0	37,255,327
2034	11,083,872	221,677	886,710	1,308,573	0	1,530,250	743,731	203,943	12,553,158	0	0	40,556,615
2035	12,553,158	251,063	1,004,253	1,400,173	0	1,651,236	804,335	230,978	14,173,333	0	0	44,137,032
2036	14,173,333	283,467	1,133,867	1,498,185	0	1,781,652	869,773	260,789	15,958,289	0	0	48,019,447
2037	15,958,289	319,166	1,276,663	1,603,058	0	1,922,224	940,425	293,633	17,923,118	0	0	52,228,557
2038	17,923,118	358,462	1,433,849	1,715,272	0	2,073,734	1,016,699	329,785	20,084,217	0	0	56,791,037
2039	20,084,217	401,684	1,606,737	1,835,341	0	2,237,025	1,099,036	369,550	22,459,395	0	0	61,735,692
2040	22,459,395	449,188	1,796,752	1,963,815	0	2,413,003	1,187,910	413,253	25,067,986	0	0	67,093,624
2041	25,067,986	501,360	2,005,439	2,101,282	0	2,602,642	1,283,832	461,251	27,930,983	0	0	72,898,416
2042	27,930,983	558,620	2,234,479	2,248,372	0	2,806,991	1,387,354	513,930	31,071,169	0	0	79,186,322
2043	31,071,169	621,423	2,485,694	2,405,758	0	3,027,181	1,499,068	571,710	34,513,266	0	0	85,996,479

Sale to Grantor Trust Illustration - Grantor-Seller

John & Mary Sample

Part 1 of 2

Year Ending In	S Corp Stock						
	Beginning Property Value	Cash Yield	Growth	Gains Transferred In	Unrealized Gains	Grantor Trust Debt Service	Ending Property Value
Start	0				0		
2008	0	0	0	0	0	0	0
2009	0	0	0	0	0	0	0
2010	0	0	0	0	0	0	0
2011	0	0	0	0	0	0	0
2012	0	0	0	0	0	0	0
2013	0	0	0	0	0	0	0
2014	0	0	0	0	0	0	0
2015	0	0	0	0	0	0	0
2016	0	0	0	759,066	759,066	907,084	907,084
2017	907,084	45,354	63,496	0	822,561	0	970,579
2018	970,579	48,529	67,941	0	890,502	0	1,038,520
2019	1,038,520	51,926	72,696	0	963,198	0	1,111,216
2020	1,111,216	55,561	77,785	0	1,040,984	0	1,189,002
2021	1,189,002	59,450	83,230	0	1,124,214	0	1,272,232
2022	1,272,232	63,612	89,056	0	1,213,270	0	1,361,288
2023	1,361,288	68,064	95,290	0	1,308,560	0	1,456,578
2024	1,456,578	72,829	101,960	0	1,410,520	0	1,558,538
2025	1,558,538	77,927	109,098	0	1,519,618	0	1,667,636
2026	1,667,636	83,382	116,735	0	1,636,353	0	1,784,371
2027	1,784,371	89,219	124,906	0	1,761,259	0	1,909,277
2028	1,909,277	95,464	133,649	0	1,894,908	0	2,042,926
2029	2,042,926	102,146	143,005	0	2,037,913	0	2,185,931
2030	2,185,931	109,297	153,015	0	2,190,928	0	2,338,946
2031	2,338,946	116,947	163,726	0	2,354,654	0	2,502,672
2032	2,502,672	125,134	175,187	0	2,529,841	0	2,677,859
2033	2,677,859	133,893	187,450	0	2,717,291	0	2,865,309
2034	2,865,309	143,265	200,572	0	2,917,863	0	3,065,881
2035	3,065,881	153,294	214,612	0	3,132,475	0	3,280,493
2036	3,280,493	164,025	229,634	0	3,362,109	0	3,510,127
2037	3,510,127	175,506	245,709	0	3,607,818	0	3,755,836
2038	3,755,836	187,792	262,909	0	3,870,727	0	4,018,745
2039	4,018,745	200,937	281,312	0	4,152,039	0	4,300,057
2040	4,300,057	215,003	301,004	0	4,453,043	0	4,601,061
2041	4,601,061	230,053	322,074	0	4,775,117	0	4,923,135
2042	4,923,135	246,157	344,619	0	5,119,737	0	5,267,755
2043	5,267,755	263,388	368,743	0	5,488,479	0	5,636,497

Sale to Grantor Trust Illustration - Grantor-Seller

John & Mary Sample

Part 2 of 2

Year Ending In	Investments and/or Estate Defunding									Total Combined Value
	Beginning Investment Balance	Current Income 2.0%	Growth 8.0%	Cash from S Corp Stock	Grantor Trust Debt Service	Qualified Dividends + Ordinary Income	Income & Medicare Taxes	Capital Gains Tax	Ending Investment Balance	
Start	0							0	0	0
2008	0	0	0	0	250,000	250,000	95,750	0	154,250	154,250
2009	154,250	3,085	12,340	0	267,500	270,585	102,453	2,823	331,900	331,900
2010	331,900	6,638	26,552	0	286,225	292,863	109,624	6,074	535,617	535,617
2011	535,617	10,712	42,849	0	306,261	316,973	135,031	9,855	750,553	750,553
2012	750,553	15,011	60,044	0	327,699	342,710	145,994	13,810	993,503	993,503
2013	993,503	19,870	79,480	0	350,638	370,508	174,936	18,280	1,250,275	1,250,275
2014	1,250,275	25,005	100,022	0	375,183	400,188	189,488	23,005	1,537,992	1,537,992
2015	1,537,992	30,760	123,039	0	401,445	432,205	205,219	28,299	1,859,718	1,859,718
2016	1,859,718	37,194	148,777	0	429,547	466,741	222,221	34,219	2,218,797	3,125,880
2017	2,218,797	44,376	177,504	45,354	0	89,730	48,380	40,826	2,396,825	3,367,404
2018	2,396,825	47,936	191,746	48,529	0	96,465	52,046	44,102	2,588,888	3,627,408
2019	2,588,888	51,778	207,111	51,926	0	103,704	55,989	47,636	2,796,079	3,907,295
2020	2,796,079	55,922	223,686	55,561	0	111,482	60,228	51,448	3,019,572	4,208,573
2021	3,019,572	60,391	241,566	59,450	0	119,842	64,786	55,560	3,260,633	4,532,865
2022	3,260,633	65,213	260,851	63,612	0	128,824	69,687	59,996	3,520,625	4,881,913
2023	3,520,625	70,413	281,650	68,064	0	138,477	74,956	64,780	3,801,017	5,257,595
2024	3,801,017	76,020	304,081	72,829	0	148,849	80,621	69,939	4,103,388	5,661,926
2025	4,103,388	82,068	328,271	77,927	0	159,995	86,712	75,502	4,429,439	6,097,075
2026	4,429,439	88,589	354,355	83,382	0	171,971	93,260	81,502	4,781,003	6,565,374
2027	4,781,003	95,620	382,480	89,219	0	184,839	100,299	87,970	5,160,052	7,069,329
2028	5,160,052	103,201	412,804	95,464	0	198,665	107,867	94,945	5,568,709	7,611,635
2029	5,568,709	111,374	445,497	102,146	0	213,520	116,002	102,464	6,009,260	8,195,191
2030	6,009,260	120,185	480,741	109,297	0	229,482	124,748	110,570	6,484,165	8,823,111
2031	6,484,165	129,683	518,733	116,947	0	246,631	134,148	119,309	6,996,071	9,498,743
2032	6,996,071	139,921	559,686	125,134	0	265,055	144,254	128,728	7,547,831	10,225,690
2033	7,547,831	150,957	603,826	133,893	0	284,850	155,116	138,880	8,142,511	11,007,820
2034	8,142,511	162,850	651,401	143,265	0	306,116	166,791	149,822	8,783,414	11,849,296
2035	8,783,414	175,668	702,673	153,294	0	328,962	179,340	161,615	9,474,095	12,754,588
2036	9,474,095	189,482	757,928	164,025	0	353,507	192,828	174,323	10,218,377	13,728,505
2037	10,218,377	204,368	817,470	175,506	0	379,874	207,325	188,018	11,020,378	14,776,214
2038	11,020,378	220,408	881,630	187,792	0	408,199	222,906	202,775	11,884,526	15,903,271
2039	11,884,526	237,691	950,762	200,937	0	438,628	239,652	218,675	12,815,589	17,115,645
2040	12,815,589	256,312	1,025,247	215,003	0	471,315	257,649	235,807	13,818,694	18,419,755
2041	13,818,694	276,374	1,105,496	230,053	0	506,427	276,991	254,264	14,899,362	19,822,497
2042	14,899,362	297,987	1,191,949	246,157	0	544,144	297,777	274,148	16,063,529	21,331,284
2043	16,063,529	321,271	1,285,082	263,388	0	584,658	320,115	295,569	17,317,587	22,954,084

Sale to Grantor Trust - Gift & Sell \$5MM ShopRight, Inc. to IDGT for 9-Year Balloon Note

Sale to Grantor Trust Illustration - Deferred Capital Gains & Medicare Tax Calculations

John & Mary Sample

Year Ending In	S Corp Stock In Trust			Grantor's Death During Note Term				Deferred Taxes		
	Trust S Corp Stock	Ending Basis	Unrealized Gains	Face Amount of Note	Gain on Deemed Sale	IRD Deduction	Heirs' Capital Gains & Medicare Taxes	Present Value of Heir's Taxes 3.0%	Balance of Unrealized Gains	Deferred Capital Gains & Medicare Taxes
2008	5,350,000	1,500,000	3,850,000	2,777,375	1,277,375	574,819	128,568	101,493	2,572,625	470,790
2009	5,724,500	1,500,000	4,224,500	2,607,083	1,107,083	498,187	111,428	90,601	3,117,417	570,487
2010	6,125,215	1,500,000	4,625,215	2,412,106	912,106	410,448	91,803	76,884	3,713,109	679,499
2011	6,553,980	1,500,000	5,053,980	2,190,269	690,269	310,621	87,319	75,322	4,363,711	1,003,654
2012	7,012,759	1,500,000	5,512,759	1,939,229	439,229	197,653	55,563	49,367	5,073,529	1,166,912
2013	7,503,652	1,500,000	6,003,652	1,656,465	156,465	70,409	23,063	21,106	5,847,187	1,567,046
2014	8,028,907	1,500,000	6,528,907	1,339,258	0	0	0	0	6,528,907	1,749,747
2015	8,590,931	1,500,000	7,090,931	984,687	0	0	0	0	7,090,931	1,900,369
2016	8,285,212	1,351,982	6,933,230	0	0	0	0	0	6,933,230	1,858,106
2017	8,865,177	1,351,982	7,513,195	0	0	0	0	0	7,513,195	2,013,536
2018	9,485,740	1,351,982	8,133,758	0	0	0	0	0	8,133,758	2,179,847
2019	10,149,742	1,351,982	8,797,760	0	0	0	0	0	8,797,760	2,357,800
2020	10,860,223	1,351,982	9,508,241	0	0	0	0	0	9,508,241	2,548,209
2021	11,620,439	1,351,982	10,268,457	0	0	0	0	0	10,268,457	2,751,947
2022	12,433,870	1,351,982	11,081,888	0	0	0	0	0	11,081,888	2,969,946
2023	13,304,241	1,351,982	11,952,259	0	0	0	0	0	11,952,259	3,203,205
2024	14,235,538	1,351,982	12,883,556	0	0	0	0	0	12,883,556	3,452,793
2025	15,232,025	1,351,982	13,880,043	0	0	0	0	0	13,880,043	3,719,852
2026	16,298,267	1,351,982	14,946,285	0	0	0	0	0	14,946,285	4,005,604
2027	17,439,146	1,351,982	16,087,164	0	0	0	0	0	16,087,164	4,311,360
2028	18,659,886	1,351,982	17,307,904	0	0	0	0	0	17,307,904	4,638,518
2029	19,966,078	1,351,982	18,614,096	0	0	0	0	0	18,614,096	4,988,578
2030	21,363,703	1,351,982	20,011,721	0	0	0	0	0	20,011,721	5,363,141
2031	22,859,163	1,351,982	21,507,181	0	0	0	0	0	21,507,181	5,763,924
2032	24,459,304	1,351,982	23,107,322	0	0	0	0	0	23,107,322	6,192,762
2033	26,171,455	1,351,982	24,819,473	0	0	0	0	0	24,819,473	6,651,619
2034	28,003,457	1,351,982	26,651,475	0	0	0	0	0	26,651,475	7,142,595
2035	29,963,699	1,351,982	28,611,717	0	0	0	0	0	28,611,717	7,667,940
2036	32,061,158	1,351,982	30,709,176	0	0	0	0	0	30,709,176	8,230,059
2037	34,305,439	1,351,982	32,953,457	0	0	0	0	0	32,953,457	8,831,526
2038	36,706,820	1,351,982	35,354,838	0	0	0	0	0	35,354,838	9,475,097
2039	39,276,297	1,351,982	37,924,315	0	0	0	0	0	37,924,315	10,163,716
2040	42,025,638	1,351,982	40,673,656	0	0	0	0	0	40,673,656	10,900,540
2041	44,967,433	1,351,982	43,615,451	0	0	0	0	0	43,615,451	11,688,941
2042	48,115,153	1,351,982	46,763,171	0	0	0	0	0	46,763,171	12,532,530
2043	51,483,214	1,351,982	50,131,232	0	0	0	0	0	50,131,232	13,435,170

PlanWiz, LLP



Sale to Grantor Trust

Supporting Schedules for
TAX RATES

AN ANALYSIS PREPARED EXCLUSIVELY FOR

John & Mary Sample

Gift & Sell \$5MM ShopRight, Inc. to IDGT for 9-Year Balloon Note

Tax Rates

John & Mary Sample

Year Ending In	John						Transferee				
	Federal Ordinary Income Tax Rate	Effective State Income Tax Rate 5.0%	Combined Ordinary Income Tax Rate	Combined Capital Gains Tax Rate	Estate Tax Rate	IRD Deduction Tax Rate	Federal Ordinary Income Tax Rate	Effective State Income Tax Rate 5.0%	Combined Ordinary Income Tax Rate	Combined Capital Gains Tax Rate	
2008	35.0%	3.3%	38.3%	18.3%	45.0%	45.0%	35.0%	3.3%	38.3%	18.3%	
2009	35.0%	3.3%	38.3%	18.3%	45.0%	45.0%	35.0%	3.3%	38.3%	18.3%	
2010	35.0%	3.3%	38.3%	18.3%	45.0%	45.0%	35.0%	3.3%	38.3%	18.3%	
2011	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2012	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2013	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2014	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2015	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2016	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2017	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2018	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2019	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2020	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2021	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2022	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2023	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2024	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2025	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2026	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2027	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2028	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2029	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2030	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2031	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2032	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2033	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2034	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2035	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2036	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2037	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2038	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2039	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2040	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2041	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2042	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	
2043	39.6%	3.0%	42.6%	23.0%	45.0%	45.0%	39.6%	3.0%	42.6%	23.0%	