U.S. Legacy
Income Trusts®

Comparing Split-Interest Vehicles

Charitable remainder trusts (CRTs) and charitable gift annuities (CGAs) are often used by donors seeking to make a contribution to charity while preserving an income stream and potentially gaining estate planning benefits. While they work in similar ways, there are key differences. Here's a side-by-side comparison to help you find the right strategy for your philanthropic goals and financial situation. It also includes a comparison to the U.S. Legacy Income Trusts® (Trusts), pooled income funds maintained by U.S. Charitable Gift Trust® (Gift Trust). Similar to CRTs and CGAs, the Trusts are split-interest vehicles that provide a lifetime income stream to designated individual beneficiaries and a gift to charity.

	U.S. LEGACY INCOME TRUSTS® (TRUSTS)	CHARITABLE REMAINDER UNITRUSTS (CRUTS)/ANNUITY TRUSTS (CRATS)	CHARITABLE GIFT ANNUITIES (CGAS)
Establishing an Account			
Startup Cost[1]	No	No if charity serving as trustee Yes if donor independently establishes the trust	No
Minimum Contribution Amount	$20,000	Typically, $100,000 or more if charity serving as trustee	Typically, $5,000 or more
Minimum Age Requirement of Individual Beneficiaries	Any living individual	Set by charity if charity serving as trustee, but typically 45+ years old for CRUTs and 70+ years old for CRATs; additional minimum age requirements imposed by law	Set by charity but typically 60 years old
Additional Contributions Permitted	Yes, so long as the Trust is still accepting additional contributions	Yes, for CRUTs No, for CRATs	No
Federal Income Tax Treatment Try the Charitable Income Tax Deduction Comparison Calculator at uscharitablegifttrust.org/USLITcalculator.			
Charitable Income Tax Deduction	Partial income tax deduction Factors that determine the deduction include, among others: ■ Assumed rate of return of 4.0% for contributions made in 2025[2] ■ Income beneficiaries' life expectancies	Partial income tax deduction Factors that determine the deduction include, among others: ■ Applicable Code Section 7520 rate (for example, 5.20% for January 2025)[3] ■ Payout rate ■ Individual beneficiaries' life expectancies and/or term of the CRT	Partial income tax deduction Factors that determine the deduction include, among others: ■ Applicable Code Section 7520 interest rate[3] ■ Annuity amount ■ Annuitants' life expectancies
Income Taxation of Distributions	Distributions expected to qualify primarily for qualified dividend income (QDI) tax treatment currently taxable at federal income tax rates of up to 23.8% for individuals subject to the 3.8% net investment income tax (as compared to up to 40.8% for ordinary income))	Tiered tax treatment Distributions taxed first as ordinary income to the extent of the trust's ordinary income, then successively as QDI, short-term capital gains, long-term capital gains and other income (including nontaxable income), each to the extent of the trust's current-year and undistributed prior-year earnings of like character, then finally as a tax-free return of principal to the extent distributions exceed the trust's total current-year and undistributed prior-year income and gains	Tax treatment based on type of asset used to fund CGA Annuity payments from a CGA funded with cash are treated partially as tax-free return of principal and partially as ordinary income; annuity payments from a CGA funded with appreciated property are treated partially as capital gains and partially as ordinary income and may also be treated partially as tax-free return of principal

	U.S. LEGACY INCOME TRUSTS® (TRUSTS)	CHARITABLE REMAINDER UNITRUSTS (CRUTS)/ANNUITY TRUSTS (CRATS)	CHARITABLE GIFT ANNUITIES (CGAS)
Individual Distributions			
Payout Structure	All Trust income must be distributed annually; income distributions to a particular beneficiary are based on the number of Trust units allocable to the beneficiary	CRUTs pay a fixed percentage of the value of the trust's assets each year, as determined annually; CRATs pay a fixed amount annually based on the initial value of the contributed assets; because CRATs offer a fixed payment, they involve potential inflation risk	Fixed annual annuity payment; because CGAs offer a fixed payment, they involve potential inflation risk
Term	Lifetime payout	Term of years or lifetime payout	Lifetime payout
Distribution Rates	Distribution rates of the common trust fund in which the Trusts invest ranged from 6.02-6.73% as of 12/31/24[4] and are expected to increase or decrease over time depending on investment returns	Distribution percentage may not be less than 5% or more than 50% and is ordinarily based on charity's policy, taking into account beneficiaries' ages; actual CRUT distributions vary depending on investment returns	Annuity rate based on American Council on Gift Annuities (ACGA) rates or charity's published rate, taking into account annuitants' ages
Charitable Remainder			
Charitable Beneficiaries	The Gift Trust is the remainder beneficiary, and the remainder of a donor's contribution is added to a donor-advised fund (DAF) account maintained by the Gift Trust, which offers several charitable distribution options and potential family involvement.	Any one or more charitable organizations, including DAF sponsoring organizations, can be designated as the remainder beneficiary; if DAF is remainder beneficiary, various charitable distribution options and potential family involvement available	Sponsor charity; ordinarily no family involvement
Remainder Value	The remainder of a Trust need not have a minimum value, but the Trusts must be managed for the benefit of both the income and charitable beneficiaries	Value of remainder interest must equal at least 10% of value of property transferred to CRUT/CRAT on date of contribution; there also cannot be a more than 5% chance of a CRAT's assets being exhausted by the annuity payments	Value of annuity must be less than 90% of contributed property; CGAs are also typically managed to provide an average gift to charity equal to 50% of the amount originally contributed

[1] All donors to the Trusts, CRTs and CGAs are encouraged to consult their own attorneys or other tax advisors prior to making gifts, which may generate costs to the donor.

[2] A pooled income fund's rate of return is determined annually, based on the age of the pooled income fund and its investment history. For pooled income funds with less than 3 years of operating history, such as the Trusts, an assumed rate of return is used that equals the highest annual average of the monthly Internal Revenue Code (Code) Section 7520 rates over the three calendar years preceding the donor's gift, minus one percent and rounded to the nearest two-tenths of one percent. The assumed rate of return for a contribution to a young pooled income fund in 2025 is 4.0%.

[3] A donor to a CRT or CGA may choose to use the Code Section 7520 rate in effect for the month the gift is made or the two preceding months.

[4] The Trusts were established on January 1, 2025 and therefore have no operating history. The Trusts invest through a common trust fund (Fund), and the performance information provided is therefore historical information from the Fund. Past distribution rates are not an indicator/guarantee of future distribution rates. The distribution rates are for the stated time period only; due to market volatility, the Trusts' distributions may be lower or higher than quoted. In addition, distributions to the income beneficiaries of a Trust are limited to the Trust's net income.

DEFINITIONS

U.S. Legacy Income Trusts® - The Trusts are pooled income funds (PIFs) established in 2025 by the Gift Trust, a tax-exempt public charity offering DAFs. Under Section 642(c)(5) of the U.S. Internal Revenue Code of 1986, as amended, a PIF is a trust maintained by a qualified public charity to which donors transfer qualifying property for investment on a commingled basis with property transferred by other donors. Each donor to a PIF designates one or more beneficiaries to receive an income interest for life based on the returns of the trust, and irrevocably commits the remainder interest upon the death of the donor's last-surviving individual income beneficiary to or for the use of the sponsoring charity.

Charitable Remainder Unitrust - A CRUT is a trust that pays one or more beneficiaries designated by the donor(s) an amount annually equal to a fixed percentage, not less than 5%, of the net fair market value of the trust assets as determined annually for the beneficiaries' lifetime or a term of years, after which the remaining trust property passes to one or more designated charitable organizations.

Charitable Remainder Annuity Trust - A CRAT is a trust that pays one or more beneficiaries designated by the donor(s) an amount annually equal to a fixed percentage, not less than 5%, of the initial net fair market value of the assets contributed to the trust for the beneficiaries' lifetime or a term of years, after which the remaining trust property passes to one or more designated charitable organizations.

Charitable Gift Annuity - A CGA is a contractual arrangement between a donor(s) and a charitable organization by which the donor(s) makes a contribution to the charitable organization in return for the charity's promise to make annuity payments to up to two individuals for their lifetimes. After the death of all of the annuitants, the remaining assets are retained by the charitable organization.

IMPORTANT INFORMATION AND DISCLOSURES

All Trust activities and the participation of donors and income beneficiaries in the Trusts are subject to the requirements of state and federal law, the terms and conditions of the Trusts' Declarations of Trust, the Trusts' current Information Statements (Information Statements) and the completed Application and/or Additional Contribution Forms submitted by each donor. The Board of Directors of the Gift Trust (Board of Directors) reserves the right to modify the Trusts' program at any time, subject to the provisions of the Trusts' Declarations of Trust and state and federal law.

To comply with federal law applicable to PIFs, the Trusts do not accept contributions of federally tax-exempt securities or shares of funds holding federally tax-exempt securities. The Trusts also do not accept contributions of securities that have been held by a donor for one year or less and do not ordinarily accept privately held or restricted stock. All transferred property must also be free and clear of any liens, encumbrances or other adverse claims.

Any contribution to a Trust, once accepted by Eaton Vance Trust Company as trustee of the Trusts (Trustee), represents an irrevocable commitment. Contributions cannot be rescinded or changed, and are subject to the exclusive legal control of the Trusts, the Trustee and the Board of Directors. Donors to the Trusts should be motivated by charitable intent. As charitable giving vehicles, the Trusts should not be treated as, and are not designed to compete with, investments made for private gain. An intention to benefit the Gift Trust and one or more qualified charitable organizations eligible for support by the Gift Trust should be a significant part of the decision to contribute to a Trust. The tax consequences of contributing to a Trust will vary based on individual circumstances. For instance, depending on a donor's relationship to his or her designated income beneficiaries, a contribution to a Trust may have gift or estate tax consequences for the donor; naming certain individuals as income beneficiaries may also have generation-skipping transfer tax implications for the donor or income beneficiaries. See "Tax Considerations" in the Information Statements. The tax treatment of distributed income may also vary. Prospective donors should consult their own tax advisors. Nothing in this document or the Information Statements should be construed as tax advice.

Distributions to income beneficiaries are not guaranteed by any party, are subject to investment risk, may fluctuate with changes in economic conditions, may not grow over time at rates consistent with inflation and may decline. In considering potential changes in target annual distribution rates to income beneficiaries, the Trustee will assess the Trusts' long-term earnings potential and seek to balance the interests of current and future income beneficiaries and the charitable remainder interests. Neither the Trusts nor the Gift Trust has been registered under federal securities laws, pursuant to available exemptions. Neither the Trusts nor the Gift Trust is guaranteed or insured by the United States or any of its agencies or instrumentalities. Contributions are not insured by the Federal Deposit Insurance Corporation and are not deposits or other obligations of, or guaranteed by, any depository institution.

Eaton Vance Distributors, Inc. (Placement Agent) is a paid solicitor of certain Trusts and the Gift Trust, receiving compensation as described in the Information Statements and in the Gifting Booklet of the Gift Trust's donor-advised funds.

The Trustee and the Placement Agent are indirect, wholly-owned subsidiaries of Morgan Stanley.

To learn more about the U.S. Legacy Income Trusts®, visit uslegacyincometrusts.org.

RO 4178474t Exp. 01/31/2026 40079 02/06/2025 24Q40405 LTR