EXHIBIT 2
Using Split-Dollar Loan to Fund Insurance Premiums and a GRAT to Pay Off the Split-Dollar Loan

Client or Client-Related Entity

Loan to ILIT to Pay Premiums
Note interest accrued or paid annually
Year 7: loan repaid by ILIT

Irrevocable Life Insurance Trust (ILIT)

Assets
Income Paid for 7 Years

GRAT Remainder
Paid to ILIT After Year 7

GRAT*

Source: Wealth Partners LLC

* Assumes a 7 Year GRAT. May also use CLAT or QPRT in lieu of GRAT. May also consider use of discounted assets to fund the GRAT (for example, shares of an FLP, LLC, or subchapter S corporation)