



## **WRNewswire**

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**Trust Reformation and Modification to Correct a Scrivener’s Error Will Not Result in Gift, Estate, or GST Tax Consequences**

The banner features a dark background with a light-colored document and a pen resting on it. The text is centered and written in a bold, white, sans-serif font.

In PLR 201732029, the IRS ruled on the gift, estate, and GST tax consequences of a judicial trust reformation and modification resulting from a scrivener’s error that omitted descendants of a predeceased child from the class of beneficiaries. The IRS determined that reformation and modification of the trust was necessary to carry out the settlor’s intent and that the trust would not lose its GST exempt status. Additionally, the trust reformation

and modification will not result in any gift or estate tax liability to any of the trust beneficiaries as the reformation does not constitute an exercise of any right to an interest in the trust or retention of power or control over trust property. See PLR 201732029.

**[View PLR 201732029](#)**

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