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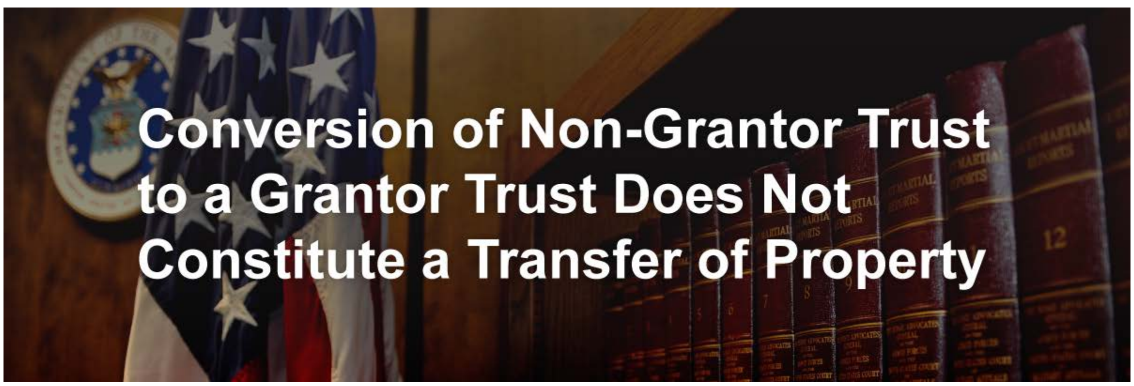

In a series of PLRs, the IRS ruled on the implications of converting a non-grantor charitable lead annuity trust ("**CLAT**") into a grantor CLAT by amending the trust agreement to include the power of substitution. The IRS determined that (1) the conversion did not constitute a transfer of property from the settlor to the trust; (2) the appointment of settlor's sibling as substitutor was not an act of self-dealing subject to excise taxes because siblings are not included in the definition of disqualified persons under the private foundation rules (which also apply to the CLAT); and (3) because the conversion was not a transfer of property, the settlor would not be entitled to a charitable income tax deduction in the year of the conversion. (*See* PLR 201730012, PLR 201730017, and PLR 201730018).

[View PLR 201730012]

[View PLR 201730017]

[View PLR 201730018]

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