IVEN R. TAUB

ATTORNEY AT LAW

Of Counsel Timothy W. Lewis $^{\Delta}$

Schwartzman Garelik Walker & Troy, P.C. $^{\Delta\Delta}$

[∆]Member Admitted in New York and Massachusetts ^{∆∆} Members Admitted in New York and New Jersey 355 LEXINGTON AVENUE 20TH FLOOR NEW YORK, NEW YORK 10017

TEL: (212) 286-7700 (212) 686-6866

FAX: (212) 481-2488 E-mail: Ivenesq@aol.com Website: www.ivenesq.com WESTCHESTER OFFICE

550 MAMARONECK AVENUE SUITE 401 HARRISON, NEW YORK 10528

TEL: (914) 835-7100 FAX: (914) 835-7466 BY APPOINTMENT ONLY

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TO: CLIENTS AND THEIR ADVISORS

RE: 2014 ESTATE AND GIFT TAX PLANNING LIMITS

The following is a Desk Reference Summary of the most relevant 2014 annual estate and gift tax planning limits and how they compare with the limits for 2012 and 2013, as a result of these limits being indexed for annual cost of living adjustments.

	<u>2012</u>	<u>2013</u>	2014
Applicable Exclusion Amount for Estate & Gift Tax	\$5,120,000	\$5,250,000	\$5,340,000
Estate and Gift Tax Rates	35%	40%	40%
Annual Gift Exclusion Amount	13,000	14,000	14,000
Exemption Amount of Gifts to a US Citizen Spouse	139,000	143,000	145,000
Generation Skipping Tax Exemption Amount	5,120,000	5,250,000	5,340,000
2% Interest Limitation Amount on § 6166 IRC Estate Tax Installment Payments	1,390,000	1,430,000	1,450,000
Nonresident Estate Tax Exemption	60,000	60,000	60,000
New York Estate Tax Exclusion Amount	1,000,000	1,000,000	2,062,500*

Our office is available to assist you or your clients in exploring these and other sophisticated gift and estate tax planning opportunities including family limited partnerships, qualified personal residence trusts and charitable scenarios which will assist in the preservation of wealth for future generations. Our other areas of specialization include real estate, tax dispute resolution, business and employment law representation and retirement planning issues.

^{*}Effective April 1, 2014 – March 31, 2015. The Exclusion Amount is phased down to \$0 when the taxable estate exceeds \$2,165,625. The Exclusion Amount will increase to \$3,125,000 on April 1, 2015 but is phased down to \$0 when the taxable estate exceeds \$3,281,250.