



STATE OF DELAWARE  
DEPARTMENT OF FINANCE  
DIVISION OF REVENUE  
601 Delaware Avenue  
Wilmington, Delaware 19899

DIVISION OF REVENUE  
TAX RULING 77-5

May 18, 1977

- Valuation of Interests in Charitable Remainder  
Unitrusts. (Inheritance Tax, Chapter 13, Title 30)

A question has been raised regarding the method of valuation of the remainder interest of a charitable remainder unitrust as defined in Section 664 (d) (2) of the Federal Internal Revenue Code for purposes of the Delaware Inheritance Tax.

It is the position of the Division of Revenue that the method of valuation set forth in the Federal Code and Regulations for valuing the life income beneficiary interest and the charitable remainder interests are appropriate and acceptable methods of valuation for purposes of the Delaware Inheritance Tax.

A handwritten signature in cursive script, appearing to read "Robert R. Smyers".

Robert R. Smyers  
Acting Director of Revenue

mrs

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