<b>F</b>	7	N	g
Form		υ	1

# United States Gift (and Generation-Skipping Transfer) Tax Return

(Section 6019 of the Internal Revenue Code) (For gifts made during calendar year 1999)

Don	ortm	ant of the Treasury	(Section 6019	of the Internal Revenue Code) (For gifts made during cal	endar year 199	9)	199	9
		nent of the Treasury Revenue Service	See separate instr	ructions. For Privacy Act Notice, see the Instru	ctions for Fo	orm 1040.		
	1	Donor's first name		2 Donor's last name	3 Donor's		5	
		FRANKLIN Z.		ADELL - Hypothetical	999		9999V	<u> </u>
	4	Address (number, s	street, and apartment number)	r)	5 Legal res Michic		iicile) (county and s	state)
	4	City state and 710						
	0	City, state, and ZIP	coue		7 Citizensh	ih		
ion							Yes	No
Jat	8			K here ► □ and enter date of death is Form 709, check here ► □ and attach the Form 4			· · · · · · · · · · · · · · · · · · ·	
L L	10			ees listed on Schedule A—count each person only				
f	11	a Have you (the	donor) previously filed a For	rm 709 (or 709-A) for any other year? If the answer is	"No." do not	complete li	ine 11b	~
all	11			ir address changed since you last filed Form 709 (or				
1—General Information	12	2 Gifts by husba	and or wife to third parties.	Do you consent to have the gifts (including gene	eration-skippi	ng transfer	s) made	
Gel		by you and by	your spouse to third part	rties during the calendar year considered as made	one-half by	each of yo	ou? (See	
Ĭ		, ,		e following information must be furnished and you	•	0		
ť	13			kip lines 13–18 and go to Schedule A.)		• • •		
Part	15		5 1					
	16		15 is "No," check whether	married divorced or widowed, and give d				
	17	7 Will a gift tax	return for this calendar yea	ear be filed by your spouse?	•			
	18	3 Consent of Spo	use—I consent to have the gi	ifts (and generation-skipping transfers) made by me and b	y my spouse t	o third partie	es during the calen	dar yea
		considered as in	lade one-hall by each of us.	We are both aware of the joint and several liability for tax	c created by th	e execution	or this consent.	
	Co	onsenting spouse's	signature <b>&gt;</b>			Date ►		
		1 Enter the a	mount from Schedule A, F	Part 3, line 15		1	818,567	
			mount from Schedule B, li			2	<u> </u>	-
			le gifts (add lines 1 and 2)			3	275,041	31
		-		(see Table for Computing Tax in separate instructi		5	0	-
			ubtract line 5 from line 4)	(see Table for Computing Tax in separate instructi	0115)	6	275,041	
			unified credit (nonresident			7	211,300	00
	_		•	llowable for all prior periods (from Sch. B, line 1, c		8	0	
	Computation		-			9	211,300	
	uta	10 Enter 20%	(.20) of the amount allowed	ed as a specific exemption for gifts made after Se	eptember 8,			
	ndr		before January 1, 1977 (se			10	0	_
	Š			)		11	211,300	_
			dit (enter the smaller of lin			12	211,300	
	2—Тах	13 Credit for f	oreign gift taxes (see instru	ructions)		13	0	
	2	14 Total credit	s (add lines 12 and 13)			14	211,300	
	Part		,	) (do not enter less than zero)		15	63,741	-
	م			rom Schedule C, Part 3, col. H, Total)		16	0	
order here.								
er h		17 Total tax (a	dd lines 15 and 16) .			17	63,741	-
Drd		18 Gift and ge	neration-skipping transfer	taxes prepaid with extension of time to file		18	0	
						10	63,741	31
ů		19 If line 18 is	less than line 17, enter B	BALANCE DUE (see instructions)		19	03,741	
or money		20 If line 18 is	greater than line 17, enter	er AMOUNT TO BE REFUNDED		20	0	
		Under penalties of pe	erjury, I declare that I have exa	amined this return, including any accompanying schedules	and statements	s, and to the	best of my knowle	edge
check	'	and belief it is true, c	orrect, and complete. Declarat	tion of preparer (other than donor) is based on all informat	on of which pro	eparer has a	ny knowledge.	
	Do	onor's signature			<u> </u>	Date 🕨		
Attach		eparer's signature						
Att	(ot	ther than donor) <b>&gt;</b>			I	Date 🕨		
		eparer's address ther than donor)						

For Paperwork Reduction Act Notice, see page 8 of the separate instructions for this form.

А

## SCHEDULE A Computation of Taxable Gifts (Including Transfers in Trust)

Does the value of any item listed on Schedule A reflect any valuation discount? If the answer is "Yes," see instructions ... Yes 🗌 No 🗌

B ☐ < Check here if you elect under section 529(c)(2)(B) to treat any transfers made this year to a qualified state tuition program as made ratably over a 5-year period beginning this year. See instructions. Attach explanation.

<b>A</b>	<ul> <li>B</li> <li>Donee's name and address</li> <li>Relationship to donor (if any)</li> <li>Description of gift</li> <li>If the gift was made by means of a trust, enter trust's identifying number and attach a copy of the trust instrument</li> <li>If the gift was of securities, give CUSIP number</li> </ul>	C	D	E	
Item		Donor's adjusted	Date	Value at	
number		basis of gift	of gift	date of gift	
1			1999	828,567	45

Part 2—Gifts That are Direct Skips and are Subject to Both Gift Tax and Generation-Skipping Transfer Tax. You must list the gifts in chronological order. *Gifts less political organization, medical, and educational exclusions—see instructions. (Also list here direct skips that are subject only to the GST tax at this time as the result of the termination of an "estate tax inclusion period." See instructions.)* 

			•			
A Item number	B • Donee's name and address • Relationship to donor (if any) • Description of gift • If the gift was made by means of a trust, enter trust's identifying number and attach a copy of the trust instrument • If the gift was of securities, give CUSIP number	Donee's name and address     Donor's adjusted     Date       Relationship to donor (if any)     basis of gift     of gift       Description of gift     If the gift was made by means of a trust, enter trust's identifying     number and attach a copy of the trust instrument			E Value at date of gift	
1						
Total o	F Part 2 (add amounts from Part 2, column E)					
	-Taxable Gift Reconciliation					
		2)		1	828,567	45
	otal value of gifts of donor (add totals from column E of Parts 1 and ne-half of itemsattrik			2	0	
	alance (subtract line 2 from line 1)			3	828,567	45
	ifts of spouse to be included (from Schedule A, Part 3, line 2 of spo			4	0	
	•					
	any of the gifts included on this line are also subject to the gene ere $\blacktriangleright$ and enter those gifts also on Schedule C, Part 1.	ration-skipping trans	ier tax, check			
	otal gifts (add lines 3 and 4)			5	828,567	45
	otal annual exclusions for gifts listed on Schedule A (including line 4			6	10,000	
	otal included amount of gifts (subtract line 6 from line 5)		,	7	818,567	45
	ions (see instructions)					
<b>8</b> G	ifts of interests to spouse for which a marital deduction will be claime n items of Schedule A	8	0			
<b>9</b> E	xclusions attributable to gifts on line 8					
10 N	larital deduction—subtract line 9 from line 8	10	0			
<b>11</b> C	haritable deduction, based on itemsless exclusio	ns <b>11</b>	0			
<b>12</b> T	otal deductions—add lines 10 and 11			12	0	
<b>13</b> S	ubtract line 12 from line 7		13	818,567	45	
	eneration-skipping transfer taxes payable with this Form 709 (from S		14	0	<u> </u>	
15 T	axable gifts (add lines 13 and 14). Enter here and on line 1 of the Ta	x Computation on pa	nge 1	15	818,567	45

(If more space is needed, attach additional sheets of same size.)

### SCHEDULE A Computation of Taxable Gifts (continued)

16 Terminable Interest (QTIP) Marital Deduction. (See instructions for line 8 of Schedule A.)

If a trust (or other property) meets the requirements of qualified terminable interest property under section 2523(f), and

a. The trust (or other property) is listed on Schedule A, and

b. The value of the trust (or other property) is entered in whole or in part as a deduction on line 8, Part 3 of Schedule A,

then the donor shall be deemed to have made an election to have such trust (or other property) treated as qualified terminable interest property under section 2523(f).

If less than the entire value of the trust (or other property) that the donor has included in Part 1 of Schedule A is entered as a deduction on line 8, the donor shall be considered to have made an election only as to a fraction of the trust (or other property). The numerator of this fraction is equal to the amount of the trust (or other property) deducted on line 10 of Part 3, Schedule A. The denominator is equal to the total value of the trust (or other property) listed in Part 1 of Schedule A.

If you make the QTIP election (see instructions for line 8 of Schedule A), the terminable interest property involved will be included in your spouse's gross estate upon his or her death (section 2044). If your spouse disposes (by gift or otherwise) of all or part of the qualifying life income interest, he or she will be considered to have made a transfer of the entire property that is subject to the gift tax (see Transfer of Certain Life Estates on page 3 of the instructions).

#### 17 Election Out of QTIP Treatment of Annuities

Check here if you elect under section 2523(f)(6) **NOT** to treat as qualified terminable interest property any joint and survivor annuities that are reported on Schedule A and would otherwise be treated as qualified terminable interest property under section 2523(f). (See instructions.) Enter the item numbers (from Schedule A) for the annuities for which you are making this election  $\blacktriangleright$ 

#### SCHEDULE B Gifts From Prior Periods

If you answered "Yes" on line 11a of page 1, Part 1, see the instructions for completing Schedule B. If you answered "No," skip to the Tax Computation on page 1 (or Schedule C, if applicable).

C	A B Calendar year or calendar quarter (see instructions) B B Internal Revenue office where prior return was filed		C Amount of unified credit against gift tax for periods after December 31, 1976	D Amount of specific exemption for prior periods ending before January 1, 1977	E Amount of taxable gifts				
				Schuchy F, F/F					
1		eriods (without adjustment for reduced specific							
2		by which total specific exemption, line 1, column D	, is more than \$30,000 .	2					
3	Total amount of taxable gifts for prior periods (add amount, column E, line 1, and amount, if any, on line 2). (Enter here and on line 2 of the Tax Computation on page 1.)       3								

(If more space is needed, attach additional sheets of same size.)

Form 709 (1999)

## SCHEDULE C Computation of Generation-Skipping Transfer Tax

**Note:** Inter vivos direct skips that are completely excluded by the GST exemption must still be fully reported (including value and exemptions claimed) on Schedule C.

Part 1—Generation-Skipping Transfers											
A B Item No. Value (from Schedule A, Part 2, col. A) Part 2, col. E)			C Split Gifts ter ½ of col. B) te instructions)	Subtract	D Subtract col. C from col. B		E Nontaxable portion of transfer		F Net Transfer (subtract col. E from col. D)		
1											
<u></u>											
was required to fil (see the instructio must enter all of t	splitting and your spouse le a separate Form 709 ns for "Split Gifts"), you he gifts shown on 2, of your spouse's Form	S Spo	plit gifts from use's Form 709 er item number)			Nontaxable portion of transfer		Net transfer (subtract col. E from col. D)			
709 here.		<u>S</u> -						<b>.</b>			
	r the item number of eacl appears in column A of										
your spouse's Scl	hedule A, Part 2. We have										
	fix "S-" to distinguish you nbers from your own whe	n									
you complete colu	umn A of Schedule C,	<u>S-</u>									
Part 3.	each gift, enter the amoun										
reported in colum	n C, Schedule C, Part 1,	of <u>&gt;-</u>									
your spouse's For		S-									
	Exemption Reconcili							<b>I</b>			
Check box ►											
	numbers (from Schedu			· ·							
1 Maximum	allowable exemption	(see instruct	ions)			• •		1			
2 Total exer	mption used for period	s before filir	ng this return .					2			
3 Exemption	n available for this retu	ırn (subtract	line 2 from line	e 1)				3			
4 Exemption	n claimed on this retur	n (from Part	3, col. C total,	, below)				4			
	n allocated to transfer: ns.)					ce of Al	llocation. (See	5			
6 Add lines	4 and 5							6			
				<b>1</b> ' 0)							
Part 3—Tax C	n available for future to	ransters (su	otract line 6 fro	om line 3)				7			
	B		T	F			G	<u> </u>			
A Item No. (from Schedule C, Part 1)	Net transfer (from Schodulo C GS	C T Exemption Allocated	D Divide col. C by col. B	E Inclusion Ratio (subtract col. D from 1.000)	F Maximum E Tax Ra		Applicable Rate (multiply col. E by col. F)		H eneration-Skipping Transfer Tax tiply col. B by col. G)		
1					55% (.5	55)		ļ			
2					55% (.5	55)		ļ			
3					55% (.5	55)					
4					55% (.5	1					
5					55% (.5	1					
6					55% (.5						
					55% (.5	1					
					55% (.5	1					
					55% (.5	1					
					55% (.5	00)					
Total exemption			Total games	tion chine in a to	ancfor toy -	ntor bo-	o on line 14 of				
here and on labove. May not				ation-skipping tra Part 3, and on I							
Part 2, above			page 1 .								

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