

Department of the Treasury Internal Revenue Service

See separate instructions. For Privacy Act Notice, see the Instructions for Form 1040.

Part 1 - General Information. Lines 1-18. Donor: FRANKLIN Z. ADELL - Hypothetical, 999 99 9999V, Michigan, 99999. Includes consent of spouse section.

Part 2 - Tax Computation. Table with 20 rows and 3 columns (line number, amount, tax). Total tax: 63,741.31.

Declaration and signature section. Includes donor's signature, preparer's signature, and preparer's address.

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

**A** 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.

**Part 1—Gifts Subject Only to Gift Tax.** *Gifts less political organization, medical, and educational exclusions—see instructions*

A Item number	B <ul style="list-style-type: none"> <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 Donor's adjusted basis of gift	D Date of gift	E Value at date of gift
1			1999	828,567 45

Total of Part 1 (add amounts from Part 1, column E) . . . . . ▶

**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 <ul style="list-style-type: none"> <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 Donor's adjusted basis of gift	D Date of gift	E Value at date of gift
1				

Total of Part 2 (add amounts from Part 2, column E) . . . . . ▶

**Part 3—Taxable Gift Reconciliation**

1	Total value of gifts of donor (add totals from column E of Parts 1 and 2) . . . . .	1	828,567	45
2	One-half of items . . . . . attributable to spouse (see instructions)	2	0	
3	Balance (subtract line 2 from line 1) . . . . .	3	828,567	45
4	Gifts of spouse to be included (from Schedule A, Part 3, line 2 of spouse's return—see instructions) . . . . .	4	0	
If any of the gifts included on this line are also subject to the generation-skipping transfer tax, check here <input type="checkbox"/> and enter those gifts also on Schedule C, Part 1.				
5	Total gifts (add lines 3 and 4) . . . . .	5	828,567	45
6	Total annual exclusions for gifts listed on Schedule A (including line 4, above) (see instructions) . . . . .	6	10,000	
7	Total included amount of gifts (subtract line 6 from line 5) . . . . .	7	818,567	45
<b>Deductions</b> (see instructions)				
8	Gifts of interests to spouse for which a marital deduction will be claimed, based on items . . . . . of Schedule A . . . . .	8	0	
9	Exclusions attributable to gifts on line 8 . . . . .	9		
10	Marital deduction—subtract line 9 from line 8 . . . . .	10	0	
11	Charitable deduction, based on items . . . . . less exclusions . . . . .	11	0	
12	Total deductions—add lines 10 and 11 . . . . .	12	0	
13	Subtract line 12 from line 7 . . . . .	13	818,567	45
14	Generation-skipping transfer taxes payable with this Form 709 (from Schedule C, Part 3, col. H, Total) . . . . .	14	0	
15	Taxable gifts (add lines 13 and 14). Enter here and on line 1 of the Tax Computation on page 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 ▶

**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).

A Calendar year or calendar quarter (see instructions)	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
1 Totals for prior periods (without adjustment for reduced specific exemption) . . . . .		1		
2 Amount, if any, 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.)*

**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 Item No. (from Schedule A, Part 2, col. A)	B Value (from Schedule A, Part 2, col. E)	C Split Gifts (enter 1/2 of col. B) (see instructions)	D Subtract col. C from col. B	E Nontaxable portion of transfer	F Net Transfer (subtract col. E from col. D)
1					
2					
3					
4					
5					
6					
If you elected gift splitting and your spouse was required to file a separate Form 709 (see the instructions for "Split Gifts"), you must enter all of the gifts shown on Schedule A, Part 2, of your spouse's Form 709 here. In column C, enter the item number of each gift in the order it appears in column A of your spouse's Schedule A, Part 2. We have preprinted the prefix "S-" to distinguish your spouse's item numbers from your own when you complete column A of Schedule C, Part 3. In column D, for each gift, enter the amount reported in column C, Schedule C, Part 1, of your spouse's Form 709.		Split gifts from spouse's Form 709 (enter item number)	Value included from spouse's Form 709	Nontaxable portion of transfer	Net transfer (subtract col. E from col. D)
S-					
S-					
S-					
S-					
S-					
S-					
S-					
S-					

**Part 2—GST Exemption Reconciliation (Section 2631) and Section 2652(a)(3) Election**

Check box  if you are making a section 2652(a)(3) (special QTIP) election (see instructions)

Enter the item numbers (from Schedule A) of the gifts for which you are making this election ▶ .....

1	Maximum allowable exemption (see instructions) . . . . .	1
2	Total exemption used for periods before filing this return . . . . .	2
3	Exemption available for this return (subtract line 2 from line 1) . . . . .	3
4	Exemption claimed on this return (from Part 3, col. C total, below) . . . . .	4
5	Exemption allocated to transfers not shown on Part 3, below. <b>You must attach a Notice of Allocation.</b> (See instructions.) . . . . .	5
6	Add lines 4 and 5 . . . . .	6
7	Exemption available for future transfers (subtract line 6 from line 3) . . . . .	7

**Part 3—Tax Computation**

A Item No. (from Schedule C, Part 1)	B Net transfer (from Schedule C, Part 1, col. F)	C GST Exemption Allocated	D Divide col. C by col. B	E Inclusion Ratio (subtract col. D from 1.000)	F Maximum Estate Tax Rate	G Applicable Rate (multiply col. E by col. F)	H Generation-Skipping Transfer Tax (multiply col. B by col. G)
1					55% (.55)		
2					55% (.55)		
3					55% (.55)		
4					55% (.55)		
5					55% (.55)		
6					55% (.55)		
					55% (.55)		
					55% (.55)		
					55% (.55)		
					55% (.55)		
Total exemption claimed. Enter here and on line 4, Part 2, above. May not exceed line 3, Part 2, above . . . . .			<b>Total generation-skipping transfer tax.</b> Enter here, on line 14 of Schedule A, Part 3, and on line 16 of the Tax Computation on page 1 . . . . .				

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

