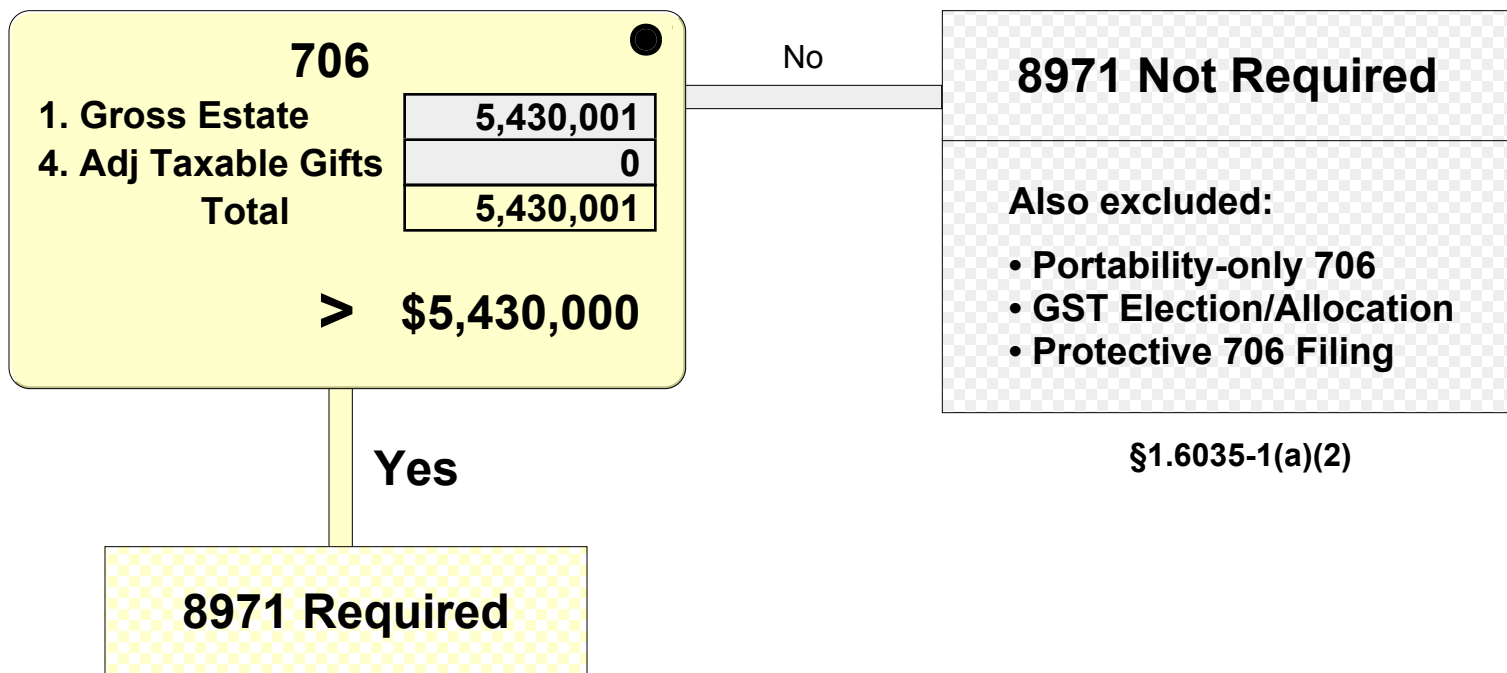


1

Who Must File



* 2014: \$5,340,000
2015: \$5,430,000
2016: \$5,450,000

Date of death

01/01/2015

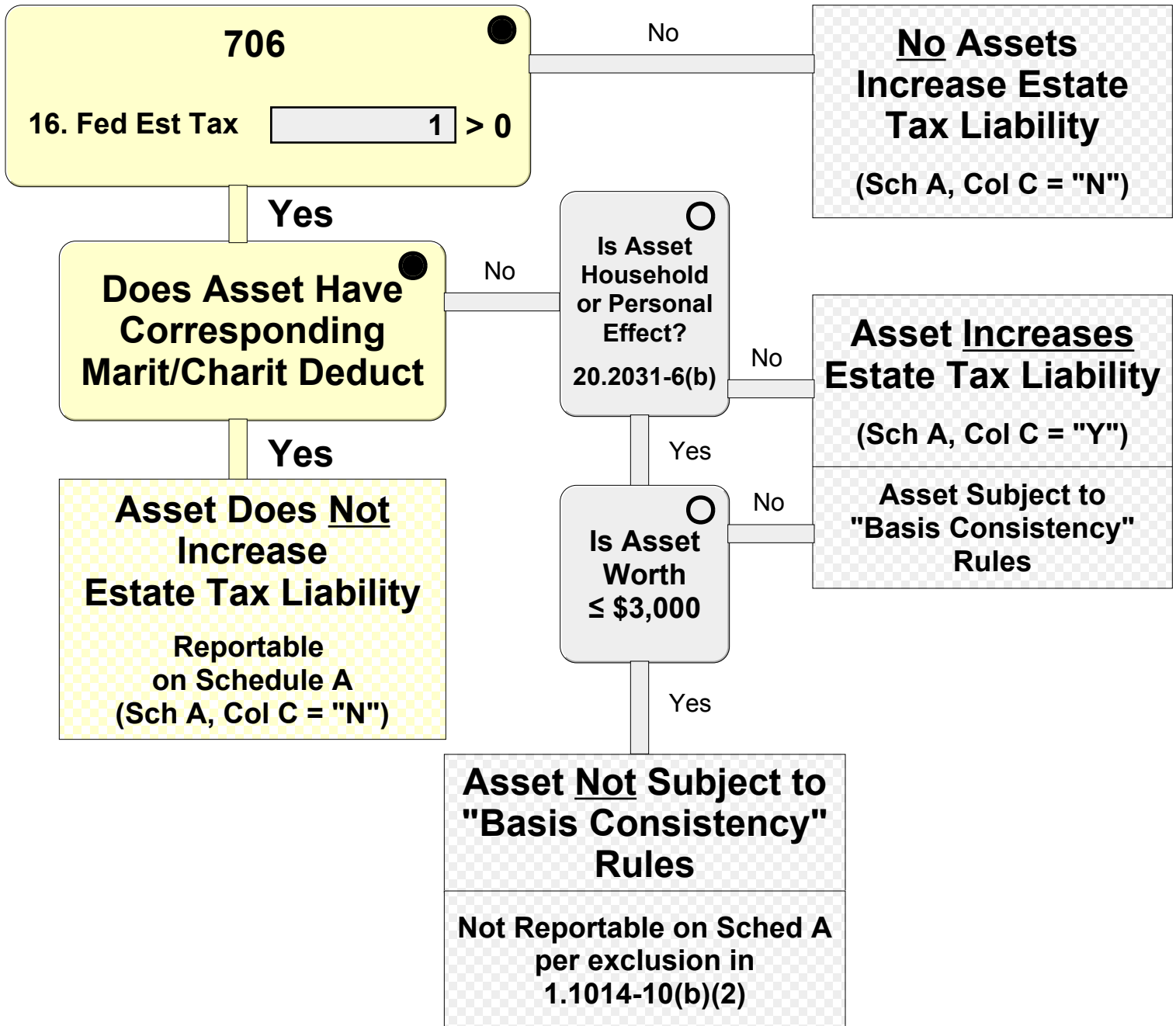
Basic Exclusion*

5,430,000

2

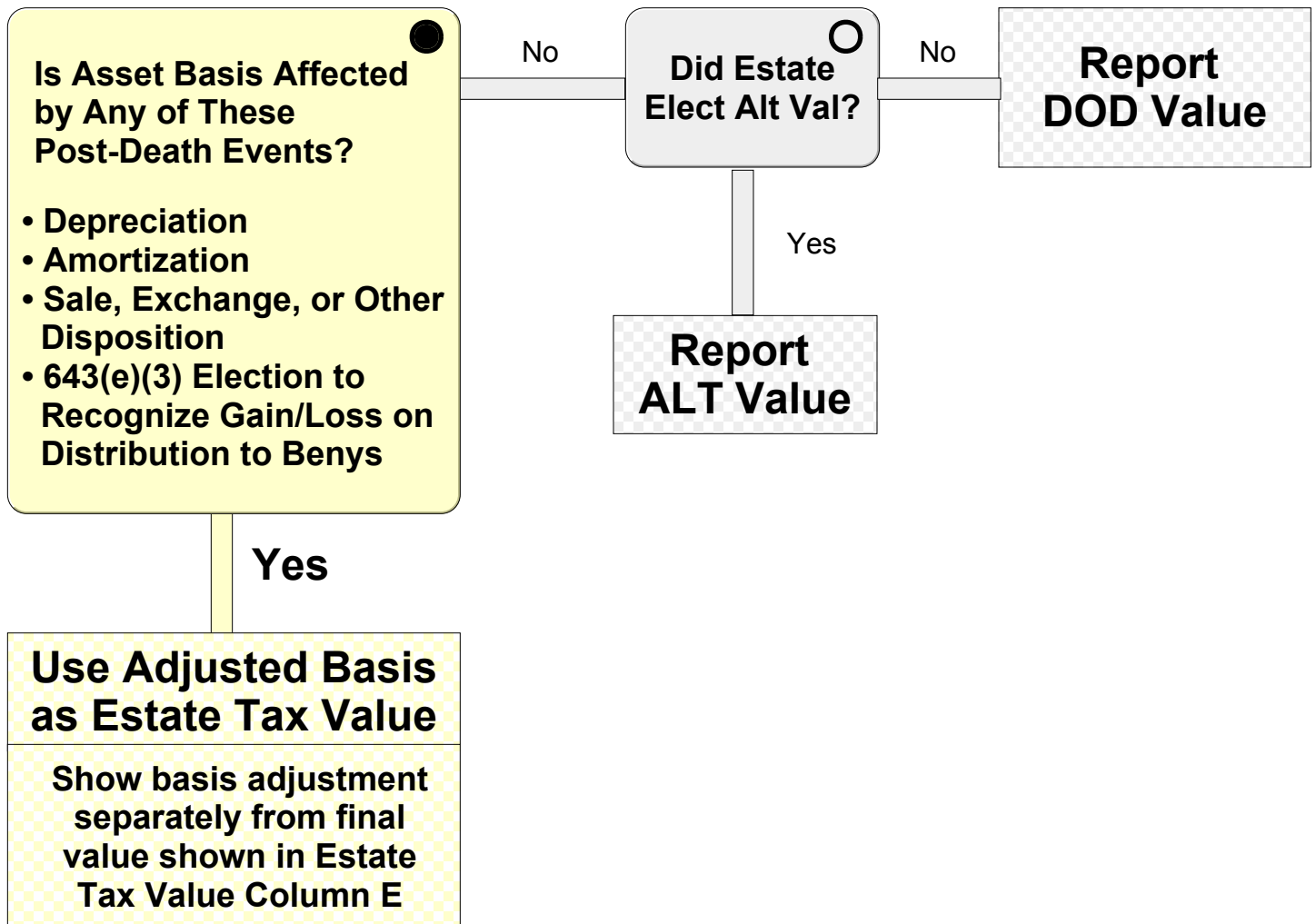
Asset Increases Estate Tax Liability

("Basis Consistency")



3

Estate Tax Value



4

Final Value

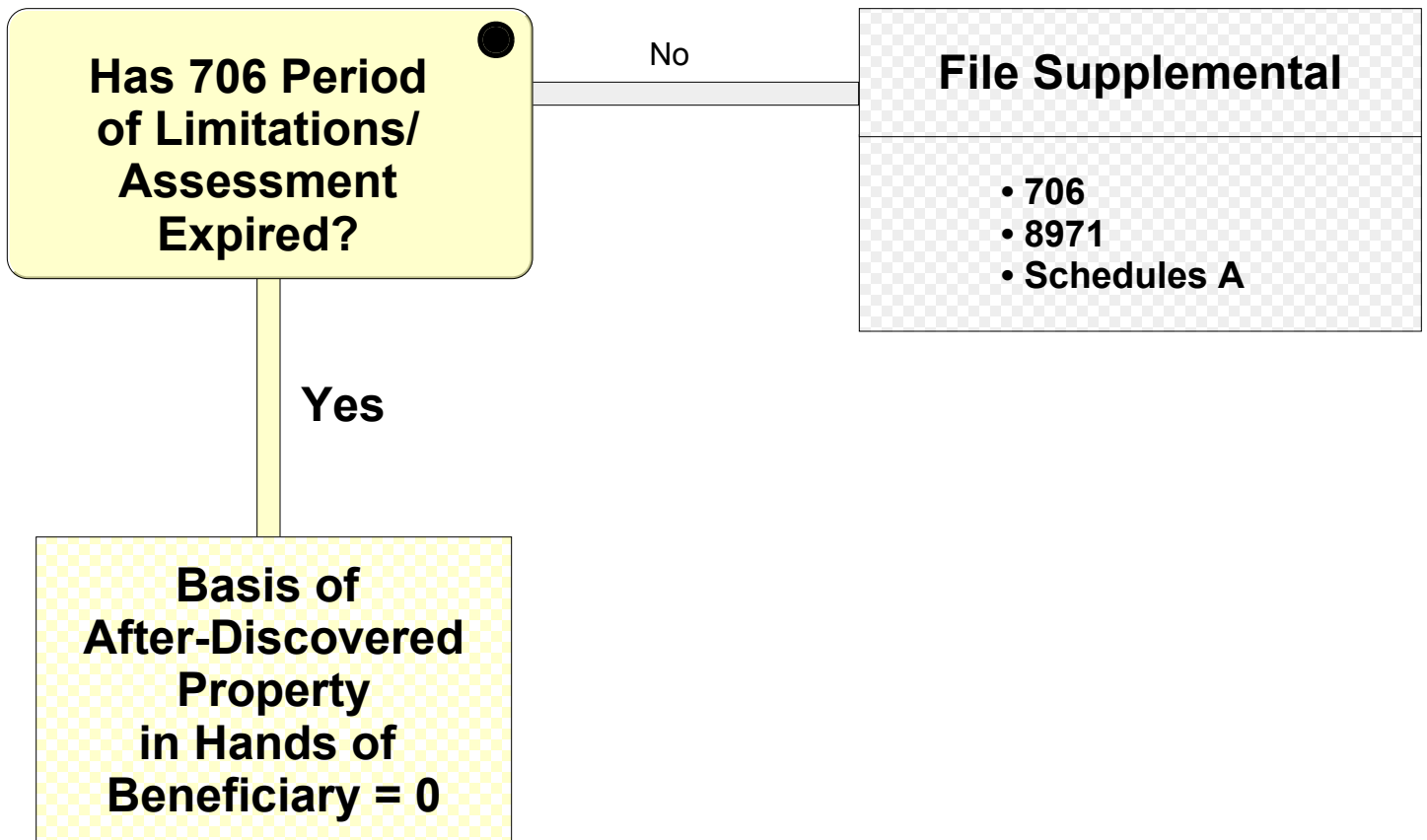
Does value meet any of the following?

- **Reported on 706 for which assessment period expired (and not timely contested by IRS)**
- **Determined by IRS once assessment period expired (and not timely contested by taxpayer)**
- **Determined in an agreement that is binding on all parties**
- **Determined by a court**

Yes

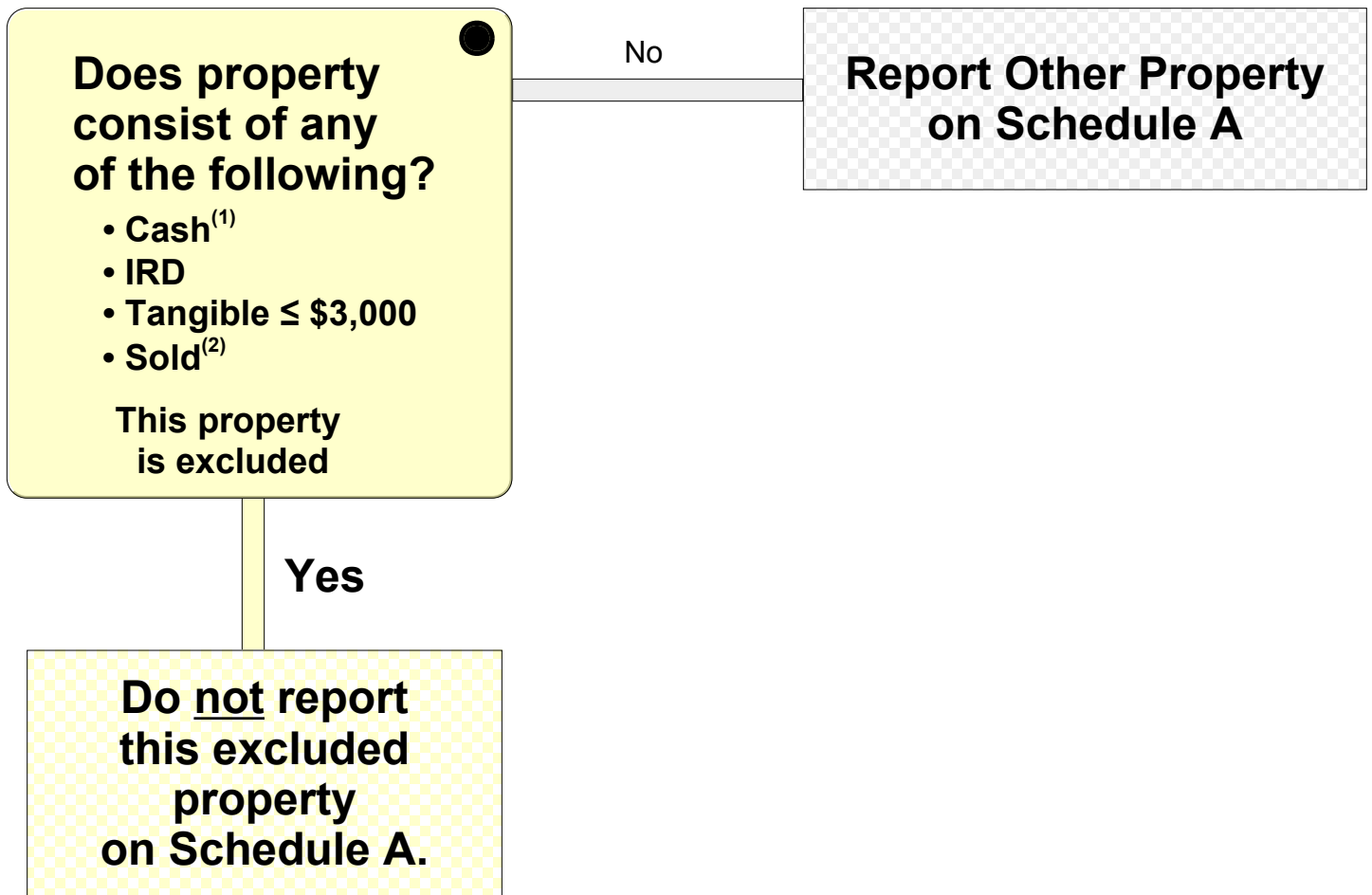
Use That Value

5 After-Discovered or Omitted Property



6

What Property to Include

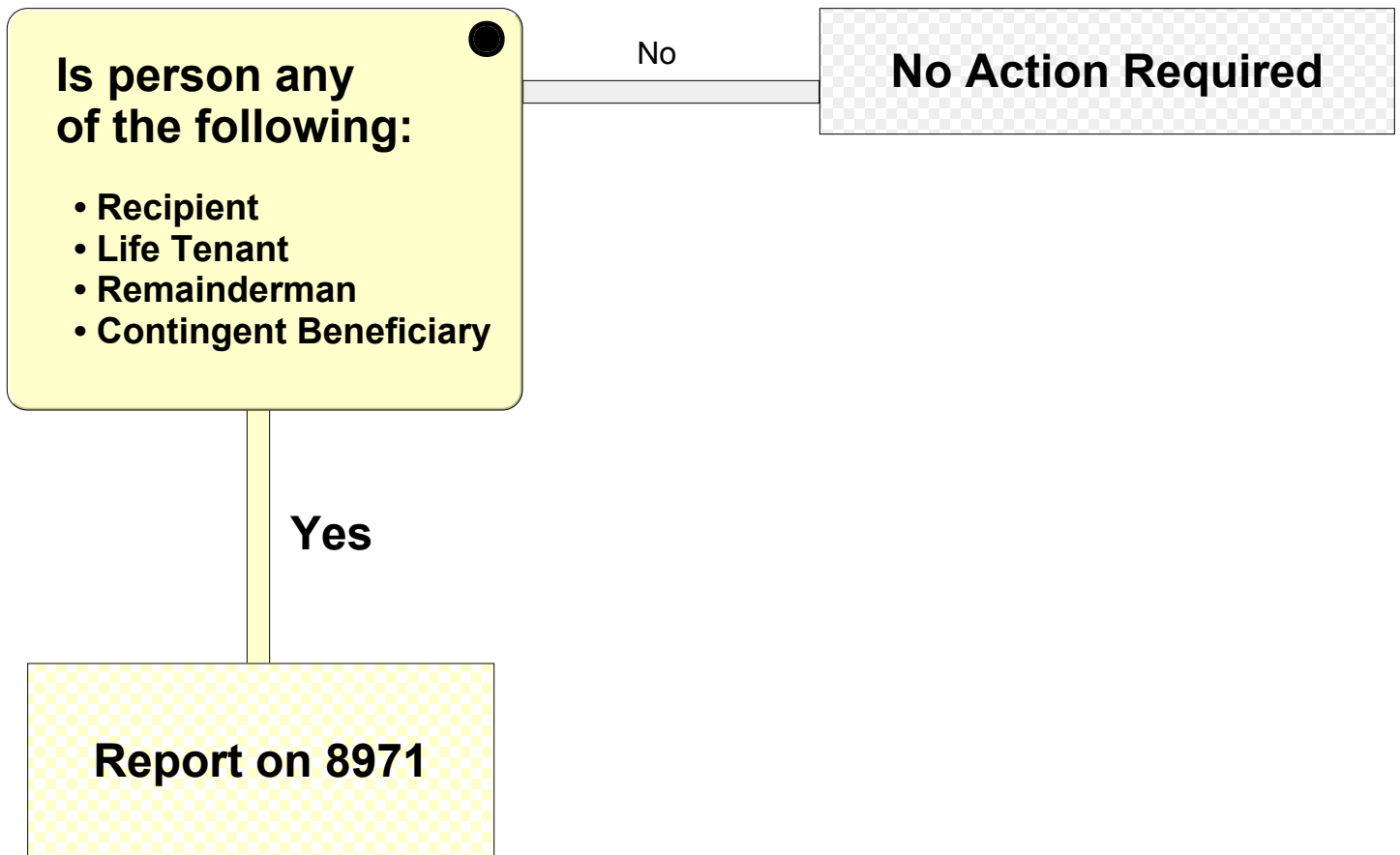


⁽¹⁾ Other than coins or paper bills with numismatic value

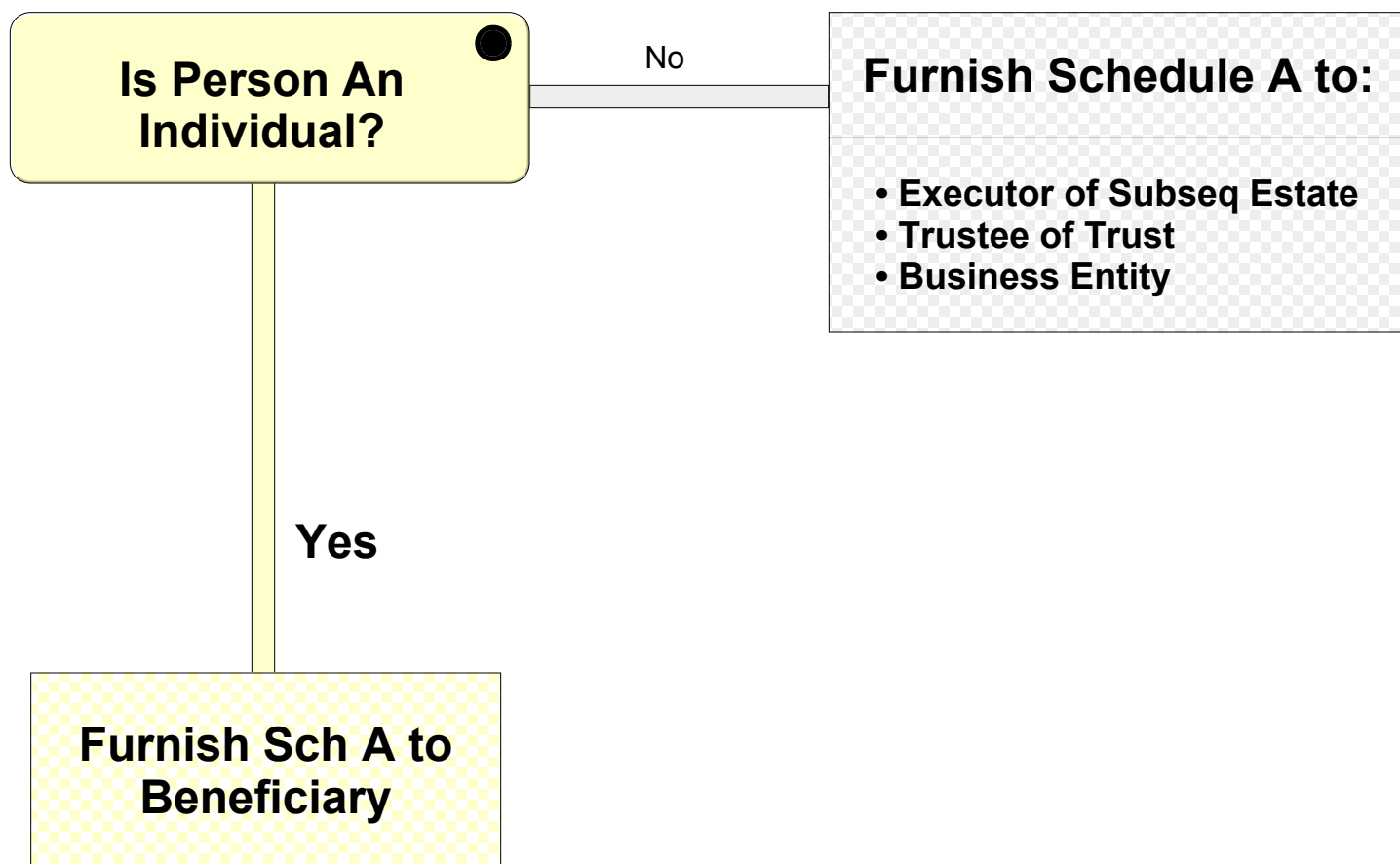
⁽²⁾ Or otherwise disposed of in a transaction in which capital gain or loss is recognized

7

Beneficiary Defined



8 Beneficiary Not an Individual



9 Beneficiary Not Determined

Has Executor determined what property will be used to satisfy interests of each beneficiary?

No

"Duplicate Reporting"

Report on Schedule A 100% of the property that Executor **could** use to satisfy beneficiaries' interests *

Beny A Apple Inc	100,000
Beny B Apple Inc	100,000
Beny C Apple Inc	100,000

Yes

Prepare Schedule A Accordingly

Example
Apple Estate Tax Value
\$100,000

Beny A Apple Inc Fractional Int 40%	40,000
Beny B Apple Inc Fractional Int 35%	35,000
Beny C Apple Inc Fractional Int 25%	25,000

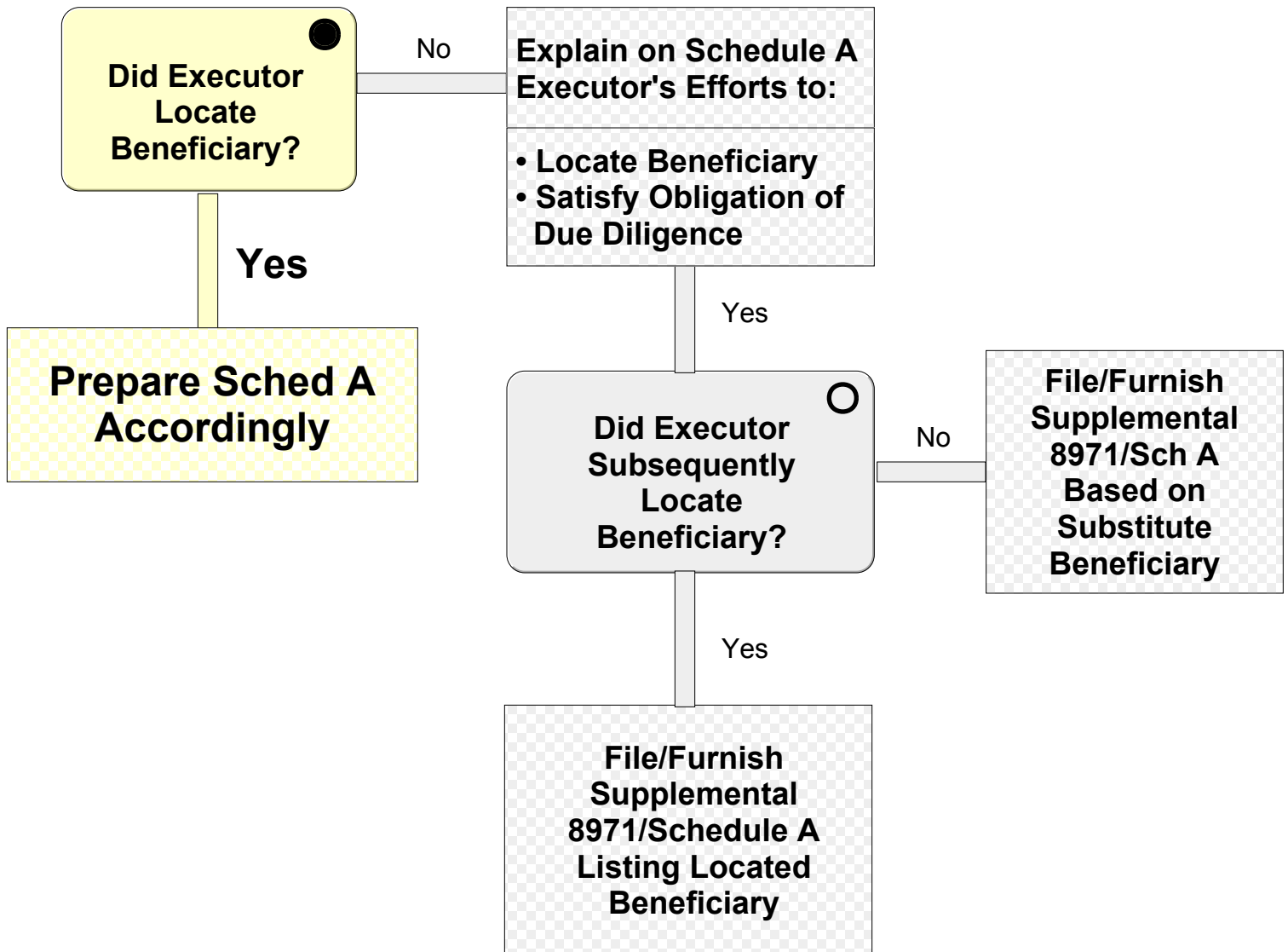
* 8971 Instructions: **should** file
Proposed Regulations: **may** file

Proposed Regulations probably supersede the earlier Instructions.

§1.6035-1(b)(3)

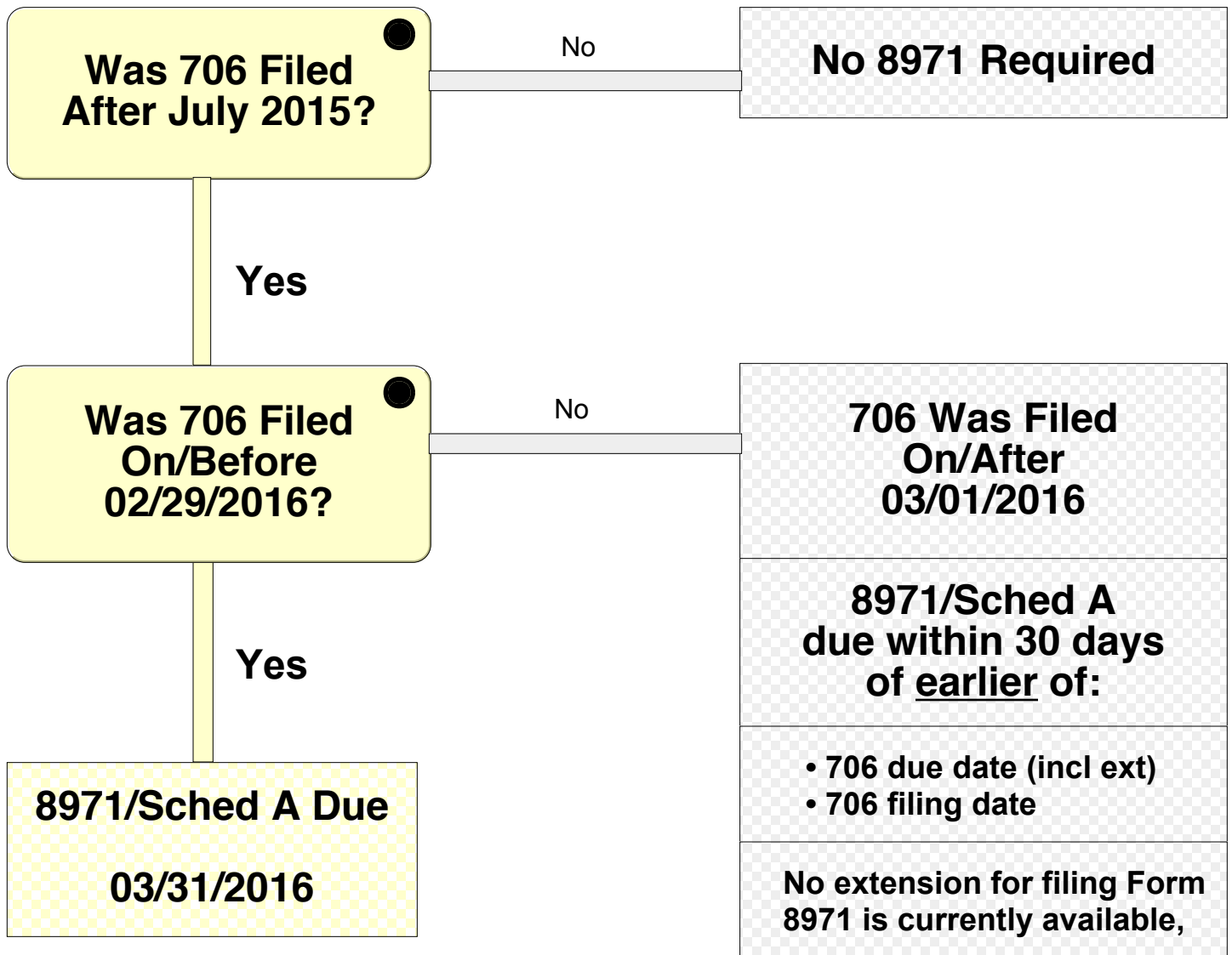
10

Beneficiary Not Located



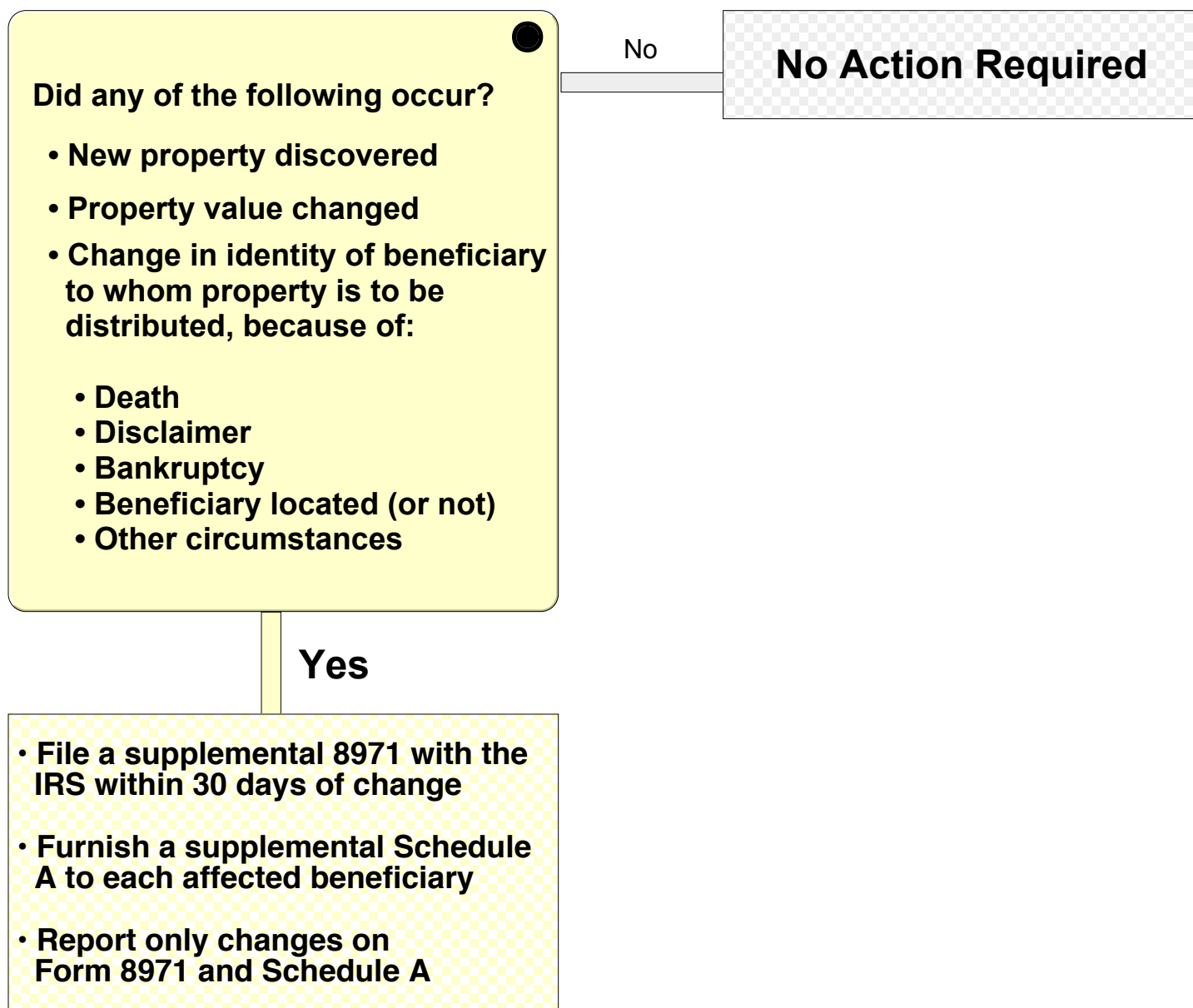
11

When to File



12

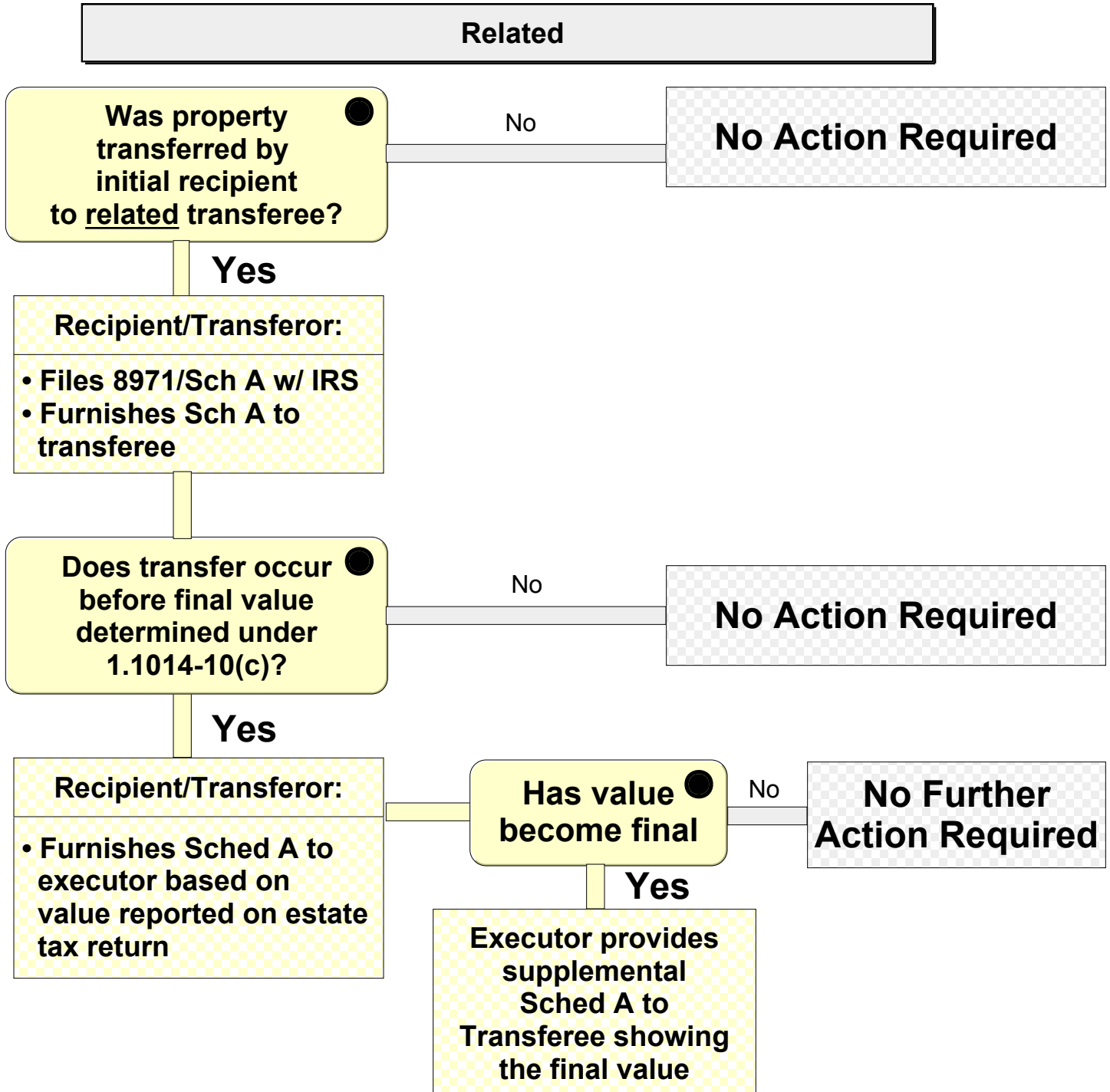
Supplemental Filing



13

Subsequent Transfers

Transferee



§1.6035-1(f)