

Calculating Estate Tax Portability Exemption Amount: The Nuts and Bolts of DSUE Computations

Planning Opportunities and Compliance Challenges in Reporting the Deceased Spouse Unused Exemption Amount

WEDNESDAY, JANUARY 20, 2016, 1:00-2:50 pm Eastern

IMPORTANT INFORMATION

This program is approved for 2 CPE credit hours. To earn credit you must:

- **Participate in the program on your own computer connection (no sharing)** - if you need to register additional people, please call customer service at 1-800-926-7926 x10 (or 404-881-1141 x10). Strafford accepts American Express, Visa, MasterCard, Discover.
- **Listen on-line** via your computer speakers.
- **Respond to five prompts during the program plus a single verification code.** You will have to write down only the final verification code on the attestation form, which will be emailed to registered attendees.
- To earn full credit, you must remain connected for the entire program.

WHO TO CONTACT

For Additional Registrations:

-Call Strafford Customer Service 1-800-926-7926 x10 (or 404-881-1141 x10)

For Assistance During the Program:

-On the web, use the chat box at the bottom left of the screen

If you get disconnected during the program, you can simply log in using your original instructions and PIN.

Department of the Treasury Internal Revenue Service

2002

See separate instructions.

Part 1—General Information

1 Donor's first name and middle initial: Lori
2 Donor's last name: Silpada
3 Donor's social security number: 999 99 9999
4 Address: 15 Hawthorn Lane
5 Legal residence: Delaware County, PA
6 City, state, and ZIP code: Garrett Hill, PA 19010
7 Citizenship: USA
8-10: Donor information questions
11a-11b: Previous filing and address change
12: Consent to gifts to third parties
13: Name of consenting spouse
14: SSN
15: Married during the year?
16: If not married, check marital status
17: Will a gift tax return be filed by your spouse?
18: Consent of Spouse

Consenting spouse's signature Date

Part 2—Tax Computation

Table with 20 rows for tax computation. Columns include line number, description, and amounts. Total tax (line 17) is 210,000.00.

Attach check or money order here.

Sign Here: Declaration of preparer and signature of donor.
Paid Preparer's Use Only: Preparer's signature, firm's name, address, ZIP code, phone number, and self-employed checkbox.

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"> 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 EIN and attach a description or copy of the trust instrument (see instructions) If the gift was of securities, give CUSIP number 	C Donor's adjusted basis of gift	D Date of gift	E Value at date of gift
1	<p>Monica Silpada (sister) 22 Jump Street Beverly Hills, CA 90210 cash gift</p>	1,511,000	2/2/2002	1,511,000 00

Total of Part 1 (add amounts from Part 1, column E) ▶ 1,511,000.00

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"> 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 EIN and attach a description or copy of the trust instrument (see instructions) If the gift was of securities, give CUSIP number 	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	1,511,000	00
2	One-half of items attributable to spouse (see instructions)	2	0	00
3	Balance (subtract line 2 from line 1)	3	1,511,000	00
4	Gifts of spouse to be included (from Schedule A, Part 3, line 2 of spouse's return—see instructions)	4	0	00
	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	1,511,000	00
6	Total annual exclusions for gifts listed on Schedule A (including line 4, above) (see instructions)	6	11,000	00
7	Total included amount of gifts (subtract line 6 from line 5)	7	1,500,000	00
Deductions (see instructions)				
8	Gifts of interests to spouse for which a marital deduction will be claimed, based on items of Schedule A	8		
9	Exclusions attributable to gifts on line 8	9		
10	Marital deduction—subtract line 9 from line 8	10		
11	Charitable deduction, based on items less exclusions	11		
12	Total deductions—add lines 10 and 11	12	0	00
13	Subtract line 12 from line 7	13	1,500,000	00
14	Generation-skipping transfer taxes payable with this Form 709 (from Schedule C, Part 3, col. H, Total)	14	0	00
15	Taxable gifts (add lines 13 and 14). Enter here and on line 1 of the Tax Computation on page 1	15	1,500,000	00

(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 4 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
NONE				
1 Totals for prior periods		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	1,100,000
2	Total exemption used for periods before filing this return	2	0
3	Exemption available for this return (subtract line 2 from line 1)	3	1,100,000
4	Exemption claimed on this return (from Part 3, col. C total, below)	4	0
5	Exemption allocated to transfers not shown on Part 3, below. You must attach a Notice of Allocation. (See instructions.)	5	0
6	Add lines 4 and 5	6	0
7	Exemption available for future transfers (subtract line 6 from line 3)	7	1,100,000

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					50% (.50)		
2					50% (.50)		
3					50% (.50)		
4					50% (.50)		
5					50% (.50)		
6					50% (.50)		
					50% (.50)		
					50% (.50)		
					50% (.50)		
					50% (.50)		

Total exemption claimed. Enter here and on line 4, Part 2, above. May not exceed line 3, Part 2, above

Total generation-skipping transfer tax. Enter here, on line 14 of Schedule A, Part 3, and on line 16 of the Tax Computation on page 1



United States Estate (and Generation-Skipping Transfer) Tax Return

OMB No. 1545-0015

Department of the Treasury
Internal Revenue Service

▶ **Estate of a citizen or resident of the United States (see instructions). To be filed for decedents dying after December 31, 2012.**
▶ **Information about Form 706 and its separate instructions is at www.irs.gov/form706.**

Part 1 - Decedent and Executor	1a Decedent's first name and middle initial (and maiden name, if any) Lori		1b Decedent's last name Silpada		2 Decedent's social security no. 999-99-9991
	3a City, town, or post office; county; state or province; country; and ZIP or foreign postal code. Miami Miami-Dade County FL 33154-		3b Year domicile established 2003	4 Date of birth 08/12/1921	5 Date of death 01/03/2014
	6a Name of executor (see instructions) Friendly Trust Company		6b Executor's address (number and street including apartment or suite no.; city, town, or post office; state or province; country; and ZIP or foreign postal code) and phone no. 45 Dolphin Drive Miami, FL 33514		
	6c Executor's social security number (see instructions) 99-9999996		Phone no. () -		
	6d If there are multiple executors, check here <input type="checkbox"/> and attach a list showing the names, addresses, telephone numbers, and SSNs of the additional executors.				
	7a Name and location of court where will was probated or estate administered Circuit Court of Dade County, Florida				7b Case number
	8 If decedent died testate, check here <input type="checkbox"/>		9 If you extended the time to file this Form 706, check here <input checked="" type="checkbox"/>		X
	10 If Schedule R-1 is attached, check here <input type="checkbox"/>		11 If you are estimating the value of assets included in the gross estate on line 1 pursuant to the special rule of Reg. section 20.2010-2T(a) (7)(i), check here <input checked="" type="checkbox"/>		X

Part 2 - Tax Computation	1 Total gross estate less exclusion (from Part 5 - Recapitulation, item 13)	1	3,000,000
	2 Tentative total allowable deductions (from Part 5 - Recapitulation, item 24)	2	2,000,000
	3a Tentative taxable estate (subtract line 2 from line 1)	3a	1,000,000
	b State death tax deduction	3b	0
	c Taxable estate (subtract line 3b from line 3a)	3c	1,000,000
	4 Adjusted taxable gifts (see instructions)	4	1,500,000
	5 Add lines 3c and 4	5	2,500,000
	6 Tentative tax on the amount on line 5 from Table A in the instructions	6	945,800
	7 Total gift tax paid or payable (see instructions)	7	200,000
	8 Gross estate tax (subtract line 7 from line 6)	8	745,800
	9a Basic exclusion amount	9a	5,340,000
	9b Deceased spousal unused exclusion (DSUE) amount from predeceased spouse(s), if any (from Section D, Part 6 - Portability of Deceased Spousal Unused Exclusion)	9b	0
	9c Applicable exclusion amount (add lines 9a and 9b)	9c	5,340,000
	9d Applicable credit amount (tentative tax on the amount in 9c from Table A in the instructions)	9d	2,081,800
	10 Adjustment to applicable credit amount (May not exceed \$6,000. See instructions.)	10	0
	11 Allowable applicable credit amount (subtract line 10 from line 9d)	11	2,081,800
	12 Subtract line 11 from line 8 (but do not enter less than zero)	12	0
	13 Credit for foreign death taxes (from Schedule P). (Attach Form(s) 706-CE.)	13	0
	14 Credit for tax on prior transfers (from Schedule Q)	14	0
	15 Total credits (add lines 13 and 14)	15	0
16 Net estate tax (subtract line 15 from line 12)	16	0	
17 Generation-skipping transfer (GST) taxes payable (from Schedule R, Part 2, line 10)	17	0	
18 Total transfer taxes (add lines 16 and 17)	18	0	
19 Prior payments (explain in an attached statement)	19	0	
20 Balance due (or overpayment) (subtract line 19 from line 18)	20	0	

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer other than the executor is based on all information of which preparer has any knowledge.

Sign Here	Signature of executor _____	Date _____
	Signature of executor _____	Date _____

Paid Preparer Use Only	Print/Type preparer's name _____	Preparer's signature _____	Date _____	Check <input type="checkbox"/> if self-employed	PTIN _____
	Firm's name ▶ _____	Firm's EIN ▶ _____		Phone no. _____	
	Firm's address ▶ _____				

Decedent's social security number
999-99-9991

Estate of: Lori Silpada

Part 3 - Elections by the Executor

Note. For information on electing portability of the decedent's DSUE amount, including how to opt out of the election, see Part 6-Portability of Deceased Spousal Unused Exclusion.

Note. Some of the following elections may require the posting of bonds or liens.

Please check "Yes" or "No" box for each question (see instructions).

	Yes	No
1 Do you elect alternate valuation?		<input checked="" type="checkbox"/>
2 Do you elect special-use valuation? If "Yes," you must complete and attach Schedule A-1		<input checked="" type="checkbox"/>
3 Do you elect to pay the taxes in installments as described in section 6166? If "Yes," you must attach the additional information described in the instructions. Note. By electing section 6166 installment payments, you may be required to provide security for estate tax deferred under section 6166 and interest in the form of a surety bond or a section 6324A lien.		<input checked="" type="checkbox"/>
4 Do you elect to postpone the part of the taxes due to a reversionary or remainder interest as described in section 6163?		<input checked="" type="checkbox"/>

Part 4 - General Information

Note. Please attach the necessary supplemental documents. **You must attach the death certificate.** (See instructions)

Authorization to receive confidential tax information under Reg. section 601.504(b)(2)(i); to act as the estate's representative before the IRS; and to make written or oral presentations on behalf of the estate:

Name of representative (print or type)	State	Address (number, street, and room or suite no., city, state, and ZIP code)	
----------------------------------------	-------	----------------------------------------------------------------------------	--

I declare that I am the attorney/ certified public accountant/ enrolled agent (check the applicable box) for the executor. I am not under suspension or disbarment from practice before the Internal Revenue Service and am qualified to practice in the state shown above.

Signature	CAF number	Date	Telephone number
			- -

1 Death certificate number and issuing authority (attach a copy of the death certificate to this return).

FLA 3629 Florida Department of Health and Vital Statistics

2 Decedent's business or occupation. If retired, check here and state decedent's former business or occupation.

Stage Performer

3a Marital status of the decedent at time of death:

Married Widow/widower Single Legally separated Divorced

3b For all prior marriages, list the name and SSN of the former spouse, the date the marriage ended, and whether the marriage ended by annulment, divorce, or death. Attach additional statements of the same size if necessary.

(1) Lawrence Fine SSN: 111-11-1111 Date of Death 12/7/1945

4a Surviving spouse's name Fred M. Crooger	4b Social security number 222-22-2222	4c Amount received (see instructions) 0
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5 Individuals (other than the surviving spouse), trusts, or other estates who receive benefits from the estate (do not include charitable beneficiaries shown in Schedule O) (see instructions).

Name of individual, trust, or estate receiving \$5,000 or more	Identifying number	Relationship to decedent	Amount (see instructions)
Moses Fine	444-44-4444	Son	1,000,000

All unascertainable beneficiaries and those who receive less than \$5,000	0
Total	1,000,000

If you answer "Yes" to any of the following questions, you must attach additional information as described.

	Yes	No
6 Is the estate filing a protective claim for refund? If "Yes," complete and attach two copies of Schedule PC for each claim.		<input checked="" type="checkbox"/>
7 Does the gross estate contain any section 2044 property (qualified terminable interest property (QTIP) from a prior gift or estate)? (see instructions)		<input checked="" type="checkbox"/>
8a Have federal gift tax returns ever been filed? If "Yes," attach copies of the returns, if available, and furnish the following information:	<input checked="" type="checkbox"/>	
b Period(s) covered	c Internal Revenue office(s) where filed	
See Attached	See Attached	
9a Was there any insurance on the decedent's life that is not included on the return as part of the gross estate?		<input checked="" type="checkbox"/>
b Did the decedent own any insurance on the life of another that is not included in the gross estate?		<input checked="" type="checkbox"/>

Estate of: Lori Silpada

999-99-9991

Page 2, Part 4 - General Information, lines 8b and 8c

2002 Cincinnati, OH

Decedent's social security number

Estate of: **Lori Silpada**

999-99-9991

Part 4 - General Information (continued)

If you answer "Yes" to any of the following questions, you must attach additional information as described.

	Yes	No
10 Did the decedent at the time of death own any property as a joint tenant with right of survivorship in which (a) one or more of the other joint tenants was someone other than the decedent's spouse, and (b) less than the full value of the property is included on the return as part of the gross estate? If "Yes," you must complete and attach Schedule E		X
11a Did the decedent, at the time of death, own any interest in a partnership (for example, a family limited partnership), an unincorporated business, or a limited liability company; or own any stock in an inactive or closely held corporation?		X
b If "Yes," was the value of any interest owned (from above) discounted on this estate tax return? If "Yes," see the instructions on reporting the total accumulated or effective discounts taken on Schedule F or G		X
12 Did the decedent make any transfer described in sections 2035, 2036, 2037, or 2038? (see instructions) If "Yes," you must complete and attach Schedule G		X
13a Were there in existence at the time of the decedent's death any trusts created by the decedent during his or her lifetime?	X	
b Were there in existence at the time of the decedent's death any trusts not created by the decedent under which the decedent possessed any power, beneficial interest, or trusteeship?		X
c Was the decedent receiving income from a trust created after October 22, 1986, by a parent or grandparent? If "Yes," was there a GST taxable termination (under section 2612) on the death of the decedent?		X
d If there was a GST taxable termination (under section 2612), attach a statement to explain. Provide a copy of the trust or will creating the trust, and give the name, address, and phone number of the current trustee(s).		
e Did the decedent at any time during his or her lifetime transfer or sell an interest in a partnership, limited liability company, or closely held corporation to a trust described in lines 13a or 13b? If "Yes," provide the EIN for this transferred/sold item. ▶		X
14 Did the decedent ever possess, exercise, or release any general power of appointment? If "Yes," you must complete and attach Schedule H		X
15 Did the decedent have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account, or other financial account?		X
16 Was the decedent, immediately before death, receiving an annuity described in the "General" paragraph of the instructions for Schedule I or a private annuity? If "Yes," you must complete and attach Schedule I	X	
17 Was the decedent ever the beneficiary of a trust for which a deduction was claimed by the estate of a predeceased spouse under section 2056(b)(7) and which is not reported on this return? If "Yes," attach an explanation		X

Part 5 - Recapitulation. Note. If estimating the value of one or more assets pursuant to the special rule of Reg. section 20.2010-2T(a)(7)(ii), enter on both lines 10 and 23 the amount noted in the instructions for the corresponding range of values. (See instructions for details.)

Item no.	Gross estate	Alternate value	Value at date of death
1	Schedule A - Real Estate	1	0
2	Schedule B - Stocks and Bonds	2	0
3	Schedule C - Mortgages, Notes, and Cash	3	0
4	Schedule D - Insurance on the Decedent's Life (attach Form(s) 712)	4	1,000,000
5	Schedule E - Jointly Owned Property (attach Form(s) 712 for life insurance)	5	0
6	Schedule F - Other Miscellaneous Property (attach Form(s) 712 for life insurance)	6	0
7	Schedule G - Transfers During Decedent's Life (att. Form(s) 712 for life insurance)	7	0
8	Schedule H - Powers of Appointment	8	0
9	Schedule I - Annuities	9	0
10	Estimated value of assets subject to the special rule of Reg. section 20.2010-2T(a)(7)(ii)	10	0
11	Total gross estate (add items 1 through 10)	11	3,000,000
12	Schedule U - Qualified Conservation Easement Exclusion	12	0
13	Total gross estate less exclusion (subtract item 12 from item 11). Enter here and on line 1 of Part 2 - Tax Computation	13	3,000,000
Item no.	Deductions	Amount	
14	Schedule J - Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims	14	0
15	Schedule K - Debts of the Decedent	15	0
16	Schedule K - Mortgages and Liens	16	0
17	Total of items 14 through 16	17	0
18	Allowable amount of deductions from item 17 (see the instructions for item 18 of the Recapitulation)	18	0
19	Schedule L - Net Losses During Administration	19	0
20	Schedule L - Expenses Incurred in Administering Property Not Subject to Claims	20	0
21	Schedule M - Bequests, etc., to Surviving Spouse	21	0
22	Schedule O - Charitable, Public, and Similar Gifts and Bequests	22	0
23	Estimated value of deductible assets subject to the special rule of Reg. section 20.2010-2T(a)(7)(ii)	23	2,000,000
24	Tentative total allowable deductions (add items 18 through 23). Enter here and on line 2 of the Tax Computation	24	2,000,000

Estate of: <u>Lori Silpada</u>	Decedent's social security number <u>999-99-9991</u>
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Part 6 - Portability of Deceased Spousal Unused Exclusion (DSUE)

Portability Election

A decedent with a surviving spouse elects portability of the deceased spousal unused exclusion (DSUE) amount, if any, by completing and timely-filing this return. No further action is required to elect portability of the DSUE amount to allow the surviving spouse to use the decedent's DSUE amount.

Section A. Opting Out of Portability

The estate of a decedent with a surviving spouse may opt out of electing portability of the DSUE amount. Check here and do not complete Sections B and C of Part 6 only if the estate opts **NOT** to elect portability of the DSUE amount.

Section B. QDOT

Are any assets of the estate being transferred to a qualified domestic trust (QDOT)? **Yes** **No**
 If "Yes," the DSUE amount portable to a surviving spouse (calculated in Section C, below) is preliminary and shall be redetermined at the time of the final distribution or other taxable event imposing estate tax under section 2056A. See instructions for more details.

Section C. DSUE Amount Portable to the Surviving Spouse (To be completed by the estate of a decedent making a portability election.)

Complete the following calculation to determine the DSUE amount that can be transferred to the surviving spouse.

1 Enter the amount from line 9c, Part 2 - Tax Computation	1	5,340,000
2 Reserved	2	
3 Enter the value of the cumulative lifetime gifts on which tax was paid or payable (see instructions)	3	500,000
4 Add lines 1 and 3	4	5,840,000
5 Enter amount from line 10, Part 2 - Tax Computation	5	0
6 Divide amount on line 5 by 40% (0.40) (do not enter less than zero)	6	0
7 Subtract lines 6 from line 4	7	5,840,000
8 Enter the amount from line 5, Part 2 - Tax Computation	8	2,500,000
9 Subtract line 8 from line 7 (do not enter less than zero)	9	3,340,000
10 DSUE amount portable to surviving spouse (Enter lesser of line 9 or line 9a, Part 2 - Tax Computation)	10	3,340,000

Section D. DSUE Amount Received from Predeceased Spouse(s) (To be completed by the estate of a deceased surviving spouse with DSUE amount from predeceased spouse(s))

Provide the following information to determine the DSUE amount received from deceased spouses.

A Name of Deceased Spouse (dates of death after December 31, 2010, only)	B Date of Death (enter as mm/dd/yy)	C Portability Election Made?		D If "Yes," DSUE Amount Received from Spouse	E DSUE Amount Applied by Decedent to Lifetime Gifts	F Year of Form 709 Reporting Use of DSUE Amount Listed in col E	G Remaining DSUE Amount, if any (subtract col. E from col. D)
		Yes	No				
Part 1 - DSUE RECEIVED FROM LAST DECEASED SPOUSE							
Part 2 - DSUE RECEIVED FROM OTHER PREDECEASED SPOUSE(S) AND USED BY DECEDENT							
Total (for all DSUE amounts from predeceased spouse(s) applied)							

Add the amount from Part 1, column D and the total from Part 2 column E. Enter the result on line 9b, Part 2-Tax Computation ▶ 0

Estate of:

Lori Silpada

Decedent's social security number

999-99-9991

SCHEDULE D - Insurance on the Decedent's Life

You must list all policies on the life of the decedent and attach a Form 712 for each policy.

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T(a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entries in the last three columns.

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
1	Transworld Life Insurance Policy No. 165 Beneficiary: Moe Fine (son)			1,000,000
Total from continuation schedules (or additional statements) attached to this schedule.				0
TOTAL. (Also enter on Part 5 - Recapitulation, page 3, at item 4.)				1,000,000

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Estate of: Lori Silpada	Decedent's social security number 999-99-9991
------------------------------------------	----------------------------------------------------------------

SCHEDULE E - Jointly Owned Property

(If you elect section 2032A valuation, you must complete Schedule E and Schedule A-1.)

PART 1. Qualified Joint Interests - Interests Held by the Decedent and His or Her Spouse as the Only Joint Tenants (Section 2040(b)(2))

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T (a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entries in the last three columns.

Item number	Description. For securities, give CUSIP number. If trust, partnership, or closely held entity, give EIN	Alternate valuation date	Alternate value	Value at date of death
1	House and lot located at 4 Sunfish Circle, Miami, Florida 33154			0
Total from continuation schedules (or additional statements) attached to this schedule				0
1a Totals			1a	0
1b Amounts included in gross estate (one-half of line 1a)			1b	0

PART 2. All Other Joint Interests

2a State the name and address of each surviving co-tenant. If there are more than three surviving co-tenants, list the additional co-tenants on an attached statement.

Name	Address (number and street, city, state, and ZIP code)
A.	
B.	
C.	

Item number	Enter letter for co-tenant	Description (including alternate valuation date if any). For securities, give CUSIP number. If trust, partnership, or closely held entity, give EIN	Percentage includible	Includible alternate value	Includible value at date of death
		None			
Total from continuation schedules (or additional statements) attached to this schedule					0
2b Total other joint interests			2b		0
3 Total includible joint interests (add lines 1b and 2b). Also enter on Part 5 - Recapitulation, page 3, at item 5			3		0

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Estate of: Lori Silpada	Decedent's social security number 999-99-9991
------------------------------------------	----------------------------------------------------------------

SCHEDULE G - Transfers During Decedent's Life

(If you elect section 2032A valuation, you must complete Schedule G and Schedule A-1.)

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T(a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entries in the last three columns.

Item number	Description. For securities, give CUSIP number. If trust, partnership, or closely held entity, give EIN	Alternate valuation date	Alternate value	Value at date of death
A.	Gift tax paid or payable by the decedent or the estate for all gifts made by the decedent or his or her spouse within 3 years before the decedent's death (section 2035(b)).	X X X X X		0
B.	Transfers includible under section 2035(a), 2036, 2037, or 2038:			
1	DECEDENT EXECUTED THE SILPADA CHARITABLE REMAINDER UNITRUST DATED 6/14/2001. Decedent received the annuity payments for her lifetime. The trust now terminates to the Germantown YMCA (a charity)			0
Total from continuation schedules (or additional statements) attached to this schedule				0
TOTAL. (Also enter on Part 5 - Recapitulation, page 3, at item 7.)				0

SCHEDULE H - Powers of Appointment

(Include "5 and 5 lapsing" powers (section 2041(b)(2)) held by the decedent.)
(If you elect section 2032A valuation, you must complete Schedule H and Schedule A-1.)

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T(a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entries in the last three columns.

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
	None			
Total from continuation schedules (or additional statements) attached to this schedule				0
TOTAL. (Also enter on Part 5 - Recapitulation, page 3, at item 8.)				0

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Estate of: Lori Silpada	Decedent's social security number 999-99-9991
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SCHEDULE I - Annuities

Note. Generally, no exclusion is allowed for the estates of decedents dying after December 31, 1984 (see instructions).

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T (a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entries in the last three columns.

A Are you excluding from the decedent's gross estate the value of a lump-sum distribution described in section 2039(f)(2) (as in effect before its repeal by the Deficit Reduction Act of 1984)?

Yes	No

If "Yes," you must attach the information required by the instructions.

Item number	Description. Show the entire value of the annuity before any exclusions	Alternate valuation date	Includible alternate value	Includible value at date of death
1	Friendly Trust Company IRA Account 00014 Beneficiary: Surviving spouse			0
Total from continuation schedules (or additional statements) attached to this schedule				0
TOTAL. (Also enter on Part 5 - Recapitulation, page 3, at item 9.)				0

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Estate of: <u>Lori Silpada</u>	Decedent's social security number <u>999-99-9991</u>
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SCHEDULE M - Bequests, etc., to Surviving Spouse

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T(a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entry in the last column.

		Yes	No
1 Did any property pass to the surviving spouse as a result of a qualified disclaimer? If "Yes," attach a copy of the written disclaimer required by section 2518(b).	1		X
2a In what country was the surviving spouse born? <u>USA</u>			
b What is the surviving spouse's date of birth? <u>01/01/1920</u>			
c Is the surviving spouse a U.S. citizen?	2c	X	
d If the surviving spouse is a naturalized citizen, when did the surviving spouse acquire citizenship? _____			
e If the surviving spouse is not a U.S. citizen, of what country is the surviving spouse a citizen? _____			
3 Election Out of QTIP Treatment of Annuities. Do you elect under section 2056(b)(7)(C)(ii) not to treat as qualified terminable interest property any joint and survivor annuities that are included in the gross estate and would otherwise be treated as qualified terminable interest property under section 2056(b)(7)(C)? (see instructions)	3		X

Item number	Description of property interests passing to surviving spouse. For securities, give CUSIP number. If trust, partnership, or closely held entity, give EIN	Amount
QTIP property:		
	None	
All other property:		
2A	50% of House and lot located at 4 Sunfish Circle, Miami, Florida 33154	0
2B	100% of Friendly Trust Company IRA Account 00014 Beneficiary: Surviving spouse	0
Total from continuation schedules (or additional statements) attached to this schedule		
4	Total amount of property interests listed on Schedule M	0
5a	Federal estate taxes payable out of property interests listed on Schedule M	0
b	Other death taxes payable out of property interests listed on Schedule M	0
c	Federal and state GST taxes payable out of property interests listed on Schedule M	0
d	Add items 5a, 5b, and 5c	0
6	Net amount of property interests listed on Schedule M (subtract 5d from 4). Also enter on Part 5 - Recapitulation, page 3, at item 21	0

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Estate of:

Lori Silpada

Decedent's social security number

999-99-9991

SCHEDULE O - Charitable, Public, and Similar Gifts and Bequests

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T (a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entry in the last column.

	Yes	No
1a If the transfer was made by will, has any action been instituted to contest or have interpreted any of its provisions affecting the charitable deductions claimed in this schedule? If "Yes," full details must be submitted with this schedule.		
b According to the information and belief of the person or persons filing this return, is any such action planned? If "Yes," full details must be submitted with this schedule.		
2 Did any property pass to charity as the result of a qualified disclaimer? If "Yes," attach a copy of the written disclaimer required by section 2518(b).		

Item number	Name and address of beneficiary	Character of institution	Amount
1	Germantown YMCA 100% of DECEDENT EXECUTED THE SILPADA CHARITABLE REMAINDER UNITRUST DATED 6/14/2001. Decedent received the annuity payments for her lifetime. The trust now terminates to the Germantown YMCA (a charity)	Educational	0

Total from continuation schedules (or additional statements) attached to this schedule 0

3 Total	3	0
4a Federal estate tax payable out of property interests listed above	4a	0
b Other death taxes payable out of property interests listed above	4b	0
c Federal and state GST taxes payable out of property interests listed above	4c	0
d Add items 4a, 4b, and 4c	4d	0
5 Net value of property interests listed above (subtract 4d from 3). Also enter on Part 5 - Recapitulation, page 3, at item 22	5	0

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Worksheet TG - Taxable Gifts Reconciliation

Total taxable gifts made before 1977 0

Line 4 - Taxable gifts made after 1976

Calendar year or quarter (a)	Total taxable gifts for period (b)	Taxable amount included in gross estate (c)	Amount qualifying as special treatment gifts (d)	Gift tax paid by decedent (e)	Gift tax paid by spouse (f)
2002	1,500,000	0	0	0	0
Totals	1,500,000	0	0	0	0
1. Taxable gifts made after 1976 (from column b)					1,500,000
2. Taxable gifts made after 1976 included in gross estate (from column c)				0	
3. Taxable gifts made after 1976 that qualify for "special treatment" (from column d)				0	
4. Add lines 2 and 3					0
5. Adjusted taxable gifts					1,500,000

Worksheet TG - Taxable Gifts Reconciliation

Line 7 Worksheet Part A

(a) Tax Period	Pre-1977	2002
(b) Taxable Gifts for Applicable Period	0	1,500,000
(c) Taxable Gifts for Prior Periods	-	0
(d) Cumulative Taxable Gifts Including Applicable Period	0	1,500,000
(e) Tax at Date of Death Rates for Prior Gifts	-	0
(f) Tax at Date of Death Rates for Cumulative Gifts including Applicable Period	0	545,800
(g) Tax at Date of Death Rates for Gifts in Applicable Period	-	545,800
(h) Total DSUE applied from Prior Periods and Applicable Period	-	0
(i) Basic Exclusion Amount for Applicable Period	-	1,000,000
(j) Basic Exclusion amount plus Total DSUE applied in prior periods and applicable period	-	1,000,000
(k) Maximum Applicable Credit amount based on Row (j)	-	345,800
(l) Applicable Credit amount used in Prior Periods	-	0
(m) Available Credit in Applicable Period	-	345,800
(n) Credit Allowable	-	345,800
(o) Tax paid or payable at Date of Death rates for Applicable Period	-	200,000
(p) Tax on Cumulative Gifts less tax paid or payable for Applicable Period	-	345,800
(q) Cumulative Taxable Gifts less Gifts in the Applicable Period on which tax was paid or payable based on Row (p)	-	1,000,000
(r) Gifts in the Applicable Period on which tax was payable	-	500,000

Line 7 Worksheet Part B

1. Total gift taxes payable on gifts made after 1976 (add amounts in row (o))	200,000
2. Gift tax paid by the decedent on gifts that qualify for "special treatment" (from Line 4 worksheet, column e)	0
3. Subtract line 2 from line 1	200,000
4. Gift tax paid by the decedent's spouse on split gifts (from Line 4 worksheet, column f)	0
5. Add lines 3 and 4. Enter here and on Part 2-Tax Computation, line 7	200,000
6. Cumulative lifetime gifts on which tax was paid or payable. Enter this amount on line 3, Section C, Part 6 of Form 706. (sum of amounts in Row (r))	500,000

Department of the Treasury
Internal Revenue Service

Information about Form 709 and its separate instructions is at www.irs.gov/form709

(For gifts made during calendar year 2014)

See instructions.

2014

Part 1 - General Information

1 Donor's first name and middle initial FRED M		2 Donor's last name CROOGER		3 Donor's social security number 444-44-4444	
4 Address (number, street, and apartment number) 4 SUNFISH CIRCLE				5 Legal residence (domicile) MIAMI-DADE	
6 City or town, state or province, country, and ZIP or foreign postal code MIAMI, FL 33154				7 Citizenship (see instructions) UNITED STATES	
8 If the donor died during the year, check here <input type="checkbox"/> and enter date of death _____, _____, _____. Yes No					
9 If you extended the time to file this Form 709, check here <input checked="" type="checkbox"/>					
10 Enter the total number of donees listed on Schedule A. Count each person only once. 1					
11a Have you (the donor) previously filed a Form 709 (or 709-A) for any other year? If "No," skip line 11b X					
11b Has your address changed since you last filed Form 709 (or 709-A)?					
12 Gifts by husband or wife to third parties. Do you consent to have the gifts (including generation-skipping transfers) made by you and by your spouse to third parties during the calendar year considered as made one-half by each of you? (see instructions.) (If the answer is "Yes," the following information must be furnished and your spouse must sign the consent shown below. If the answer is "No," skip lines 13-18.)					
13 Name of consenting spouse				14 SSN	
15 Were you married to one another during the entire calendar year? (see instructions)					
16 If 15 is "No," check whether <input type="checkbox"/> married <input type="checkbox"/> divorced or <input type="checkbox"/> widowed/deceased, and give date					
17 Will a gift tax return for this year be filed by your spouse? (If "Yes," mail both returns in the same envelope.)					
18 Consent of Spouse. I consent to have the gifts (and generation-skipping transfers) made by me and by my spouse to third parties during the calendar year considered as made one-half by each of us. We are both aware of the joint and several liability for tax created by the execution of this consent.					
Consenting spouse's signature				Date	
19 Have you applied a DSUE amount received from a predeceased spouse to a gift or gifts reported on this or a previous Form 709? If "Yes," complete Schedule C X					

Part 2 - Tax Computation

1	Enter the amount from Schedule A, Part 4, line 11	1	2,000,000.
2	Enter the amount from Schedule B, line 3	2	
3	Total taxable gifts. Add lines 1 and 2	3	2,000,000.
4	Tax computed on amount on line 3 (see Table for Computing Gift Tax in instructions)	4	745,800.
5	Tax computed on amount on line 2 (see Table for Computing Gift Tax in instructions)	5	
6	Balance. Subtract line 5 from line 4	6	745,800.
7	Applicable credit amount. If donor has DSUE amount from predeceased spouse(s), enter amount from Schedule C, line 4; otherwise, see instructions	7	2,881,800.
8	Enter the applicable credit against tax allowable for all prior periods (from Sch. B, line 1, col. C)	8	
9	Balance. Subtract line 8 from line 7. Do not enter less than zero	9	2,881,800.
10	Enter 20% (.20) of the amount allowed as a specific exemption for gifts made after September 8, 1976, and before January 1, 1977 (see instructions)	10	
11	Balance. Subtract line 10 from line 9. Do not enter less than zero	11	2,881,800.
12	Applicable credit. Enter the smaller of line 6 or line 11	12	745,800.
13	Credit for foreign gift taxes (see instructions)	13	
14	Total credits. Add lines 12 and 13	14	745,800.
15	Balance. Subtract line 14 from line 6. Do not enter less than zero	15	0.
16	Generation-skipping transfer taxes (from Schedule D, Part 3, col. H, Total)	16	
17	Total tax. Add lines 15 and 16	17	0.
18	Gift and generation-skipping transfer taxes prepaid with extension of time to file	18	
19	If line 18 is less than line 17, enter balance due (see instructions)	19	0.
20	If line 18 is greater than line 17, enter amount to be refunded	20	

Attach check or money order here.

Under penalties of perjury, I declare that I have examined this return, including any accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than donor) is based on all information of which preparer has any knowledge.

May the IRS discuss this return with the preparer shown below (see instructions)? **Yes** **No**

Sign Here Signature of donor _____ Date _____

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name THE GLENMEDE TRUST COMPANY, N.A.	Firm's EIN 32 0274136	Phone no. (215) 419-6000		
Firm's address 1650 MARKET STREET, SUITE 1200 PHILADELPHIA, PA 19103-7391				

SCHEDULE A Computation of Taxable Gifts (Including transfers in trust) (see instructions)

A Does the value of any item listed on Schedule A reflect any valuation discount? If "Yes," attach explanation Yes No

B Check here if you elect under section 529(c)(2)(B) to treat any transfers made this year to a qualified 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 ● Donee's name and address ● Relationship to donor (if any) ● Description of gift ● If the gift was of securities, give CUSIP no. ● If closely held entity, give EIN	C	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter 1/2 of column F	H Net transfer (subtract col. G from col. F)
1	JANET CROOGER DAUGHTER CASH GIFT		2,014,000.	06/01/14	2,014,000.		2,014,000.

Gifts made by spouse - complete *only* if you are splitting gifts with your spouse and he/she also made gifts.

A Item number	B ● Donee's name and address ● Relationship to donor (if any) ● Description of gift ● If the gift was of securities, give CUSIP no. ● If closely held entity, give EIN	C	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter 1/2 of column F	H Net transfer (subtract col. G from col. F)

Total of Part 1. Add amounts from Part 1, column H **2,014,000.**

Part 2 - Direct Skips. 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.

A Item number	B ● Donee's name and address ● Relationship to donor (if any) ● Description of gift ● If the gift was of securities, give CUSIP no. ● If closely held entity, give EIN	C 2632(b) election out	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter 1/2 of column F	H Net transfer (subtract col. G from col. F)

Gifts made by spouse - complete *only* if you are splitting gifts with your spouse and he/she also made gifts.

A Item number	B ● Donee's name and address ● Relationship to donor (if any) ● Description of gift ● If the gift was of securities, give CUSIP no. ● If closely held entity, give EIN	C 2632(b) election out	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter 1/2 of column F	H Net transfer (subtract col. G from col. F)

Total of Part 2. Add amounts from Part 2, column H **0.**

Part 3 - Indirect Skips. Gifts to trusts that are currently subject to gift tax and may later be subject to generation-skipping transfer tax. You must list these gifts in chronological order.

A Item number	B ● Donee's name and address ● Relationship to donor (if any) ● Description of gift ● If the gift was of securities, give CUSIP no. ● If closely held entity, give EIN	C 2632(c) election	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter 1/2 of column F	H Net transfer (subtract col. G from col. F)

Gifts made by spouse - complete *only* if you are splitting gifts with your spouse and he/she also made gifts.

A Item number	B ● Donee's name and address ● Relationship to donor (if any) ● Description of gift ● If the gift was of securities, give CUSIP no. ● If closely held entity, give EIN	C 2632(c) election	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter 1/2 of column F	H Net transfer (subtract col. G from col. F)

Total of Part 3. Add amounts from Part 3, column H **0.**

(If more space is needed, attach additional statements.)

Part 4 - Taxable Gift Reconciliation

1	Total value of gifts of donor. Add totals from column H of Parts 1, 2, and 3	1	2,014,000.
2	Total annual exclusions for gifts listed on line 1 (see instructions)	2	14,000.
3	Total included amount of gifts. Subtract line 2 from line 1	3	2,000,000.
Deductions (see instructions)			
4	Gifts of interests to spouse for which a marital deduction will be claimed, based on item numbers _____ of Schedule A	4	
5	Exclusions attributable to gifts on line 4	5	
6	Marital deduction. Subtract line 5 from line 4	6	
7	Charitable deduction, based on item nos. _____ less exclusions	7	
8	Total deductions. Add lines 6 and 7	8	
9	Subtract line 8 from line 3	9	2,000,000.
10	Generation-skipping transfer taxes payable with this Form 709 (from Schedule D, Part 3, col. H, Total)	10	
11	Taxable gifts. Add lines 9 and 10. Enter here and on page 1, Part 2 - Tax Computation, line 1	11	2,000,000.

Terminable Interest (QTIP) Marital Deduction. (see instructions for Schedule A, Part 4, line 4)

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 Schedule A, Part 4, line 4, 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 Parts 1 and 3 of Schedule A is entered as a deduction on line 4, 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 Schedule A, Part 4, line 6. The denominator is equal to the total value of the trust (or other property) listed in Parts 1 and 3 of Schedule A.

If you make the QTIP election, the terminable interest property involved will be included in your spouse's gross estate upon his or her death (section 2044). See instructions for line 4 of Schedule A. 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 Received From Spouse* in the instructions.

12 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 Schedules C or D, if applicable). Complete Schedule A before beginning Schedule B. See instructions for recalculation of the column C amounts. Attach calculations.

A	B	C	D	E
Calendar year or calendar quarter (see instructions)	Internal Revenue office where prior return was filed	Amount of applicable credit (unified credit) against gift tax for periods after December 31, 1976	Amount of specific exemption for prior periods ending before January 1, 1977	Amount of taxable gifts
1	Totals for prior periods	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 on line 1, column E and amount, if any, on line 2. Enter here and on page 1, Part 2 - Tax Computation, line 2	3		

(If more space is needed, attach additional statements.)

SCHEDULE C Deceased Spousal Unused Exclusion (DSUE) Amount

Provide the following information to determine the DSUE amount and applicable credit received from prior spouses. Complete Schedule A before beginning Schedule C.

A Name of Deceased Spouse (dates of death after December 31, 2010 only)	B Date of Death	C Portability Election Made?		D If "Yes," DSUE Amount Received from Spouse	E DSUE Amount Applied by Donor to Lifetime Gifts (list current and prior gifts)	F Date of Gift(s) (enter as mm/dd/yy for Part 1 and as yyyy for Part 2)
		Yes	No			
Part 1 - DSUE RECEIVED FROM LAST DECEASED SPOUSE						
LORI SILPADA	01/03/14	X		3,340,000.	2,000,000.	06/01/14
Part 2 - DSUE RECEIVED FROM PREDECEASED SPOUSE(S)						
TOTAL (for all DSUE amounts applied from column E for Part 1 and Part 2)				2,000,000.		

1 Donor's basic exclusion amount (see instructions)	1	5,340,000.
2 Total from column E, Parts 1 and 2	2	2,000,000.
3 Add lines 1 and 2	3	7,340,000.
4 Applicable credit on amount in line 3 (See <i>Table for Computing Gift Tax</i> in the instructions). Enter here and on line 7, Part 2 - Tax Computation	4	2,881,800.

SCHEDULE D 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 D.

Part 1 - Generation-Skipping Transfers

A Item No. (from Schedule A, Part 2, col. A)	B Value (from Schedule A, Part 2, col. H)	C Nontaxable Portion of Transfer	D Net Transfer (subtract col. C from col. B)
Gifts made by spouse (for gift splitting only)			

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

Check here 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	5,340,000.
2	Total exemption used for periods before filing this return	2	
3	Exemption available for this return. Subtract line 2 from line 1	3	5,340,000.
4	Exemption claimed on this return from Part 3, column C total, below	4	
5	Automatic allocation of exemption to transfers reported on Schedule A, Part 3. To opt out of the automatic allocation rules, you must attach an "Election Out" statement. (see instructions)	5	
6	Exemption allocated to transfers not shown on line 4 or 5, above. You must attach a "Notice of Allocation." (see instructions)	6	
7	Add lines 4, 5, and 6	7	
8	Exemption available for future transfers. Subtract line 7 from line 3	8	5,340,000.

Part 3 - Tax Computation

A Item No. (from Schedule D, Part 1)	B Net Transfer (from Schedule D, Part 1, col. D)	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)
					40% (.40)		
					40% (.40)		
					40% (.40)		
					40% (.40)		
					40% (.40)		
					40% (.40)		
Gifts made by spouse (for gift splitting only)							
					40% (.40)		
					40% (.40)		
					40% (.40)		
					40% (.40)		
					40% (.40)		
Total exemption claimed. Enter here and on Part 2, line 4, above. May not exceed Part 2, line 3, above					Total generation-skipping transfer tax. Enter here; on page 3, Schedule A, Part 4, line 10; and on page 1, Part 2 - Tax Computation, line 16		

(If more space is needed, attach additional statements.)

***** NOTICE *****

The forms and schedules included in this release have a Revised Date of August 2013. As of this date, the IRS is not planning on updating forms for 2015 Dates of Death.

Note: 2015 706 instructions have not yet been released by the IRS.

For applicable states, these forms may be used as an attachment to your State estate tax return. However, please review the product release notes, as not all 2015 state calculations are included in this release.

If the IRS does release updated forms and schedules, we will incorporate them into the program at that time.

United States Estate (and Generation-Skipping Transfer) Tax Return

OMB No. 1545-0015

Department of the Treasury
Internal Revenue Service

▶ **Estate of a citizen or resident of the United States (see instructions). To be filed for decedents dying after December 31, 2012.**
▶ **Information about Form 706 and its separate instructions is at www.irs.gov/form706.**

Part 1 - Decedent and Executor	1a Decedent's first name and middle initial (and maiden name, if any) Lisa		1b Decedent's last name Vanderflatts		2 Decedent's social security no. 888-88-7777	
	3a City, town, or post office; county; state or province; country; and ZIP or foreign postal code. Miami Miami-Dade FL 33154-		3b Year domicile established 1963	4 Date of birth 07/04/1963	5 Date of death 02/02/2015	
	6a Name of executor (see instructions) Friendly Trust Company		6b Executor's address (number and street including apartment or suite no.; city, town, or post office; state or province; country; and ZIP or foreign postal code) and phone no. 45 Dolphin Drive Miami, FL 33514			
	6c Executor's social security number (see instructions) 99-9999996		Phone no. () -			
	6d If there are multiple executors, check here <input checked="" type="checkbox"/> and attach a list showing the names, addresses, telephone numbers, and SSNs of the additional executors.					
	7a Name and location of court where will was probated or estate administered Circuit Court of Dade County, Florida				7b Case number 99998	
	8 If decedent died testate, check here <input checked="" type="checkbox"/>		9 If you extended the time to file this Form 706, check here <input checked="" type="checkbox"/>		11 If you are estimating the value of assets included in the gross estate on line 1 pursuant to the special rule of Reg. section 20.2010-2T(a) (7)(i), check here <input type="checkbox"/>	
	10 If Schedule R-1 is attached, check here <input type="checkbox"/>					

Part 2 - Tax Computation	1 Total gross estate less exclusion (from Part 5 - Recapitulation, item 13)	1	9,500,000
	2 Tentative total allowable deductions (from Part 5 - Recapitulation, item 24)	2	8,500,000
	3a Tentative taxable estate (subtract line 2 from line 1)	3a	1,000,000
	b State death tax deduction	3b	0
	c Taxable estate (subtract line 3b from line 3a)	3c	1,000,000
	4 Adjusted taxable gifts (see instructions)	4	0
	5 Add lines 3c and 4	5	1,000,000
	6 Tentative tax on the amount on line 5 from Table A in the instructions	6	345,800
	7 Total gift tax paid or payable (see instructions)	7	0
	8 Gross estate tax (subtract line 7 from line 6)	8	345,800
	9a Basic exclusion amount	9a	5,430,000
	9b Deceased spousal unused exclusion (DSUE) amount from predeceased spouse(s), if any (from Section D, Part 6 - Portability of Deceased Spousal Unused Exclusion)	9b	0
	9c Applicable exclusion amount (add lines 9a and 9b)	9c	5,430,000
	9d Applicable credit amount (tentative tax on the amount in 9c from Table A in the instructions)	9d	2,117,800
	10 Adjustment to applicable credit amount (May not exceed \$6,000. See instructions.)	10	0
	11 Allowable applicable credit amount (subtract line 10 from line 9d)	11	2,117,800
	12 Subtract line 11 from line 8 (but do not enter less than zero)	12	0
	13 Credit for foreign death taxes (from Schedule P). (Attach Form(s) 706-CE.)	13	0
	14 Credit for tax on prior transfers (from Schedule Q)	14	0
	15 Total credits (add lines 13 and 14)	15	0
16 Net estate tax (subtract line 15 from line 12)	16	0	
17 Generation-skipping transfer (GST) taxes payable (from Schedule R, Part 2, line 10)	17	0	
18 Total transfer taxes (add lines 16 and 17)	18	0	
19 Prior payments (explain in an attached statement)	19	0	
20 Balance due (or overpayment) (subtract line 19 from line 18)	20	0	

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer other than the executor is based on all information of which preparer has any knowledge.

Sign Here	Signature of executor _____	Date _____
	Signature of executor _____	Date _____

Paid Preparer Use Only	Print/Type preparer's name _____	Preparer's signature _____	Date _____	Check <input type="checkbox"/> if self-employed	PTIN _____
	Firm's name ▶ _____	Firm's EIN ▶ _____		Phone no. _____	
	Firm's address ▶ _____				

Decedent's social security number
888-88-7777

Estate of: Lisa Vanderflatts

Part 3 - Elections by the Executor

Note. For information on electing portability of the decedent's DSUE amount, including how to opt out of the election, see Part 6-Portability of Deceased Spousal Unused Exclusion.

Note. Some of the following elections may require the posting of bonds or liens.

Please check "Yes" or "No" box for each question (see instructions).

	Yes	No
1 Do you elect alternate valuation?		<input checked="" type="checkbox"/>
2 Do you elect special-use valuation? If "Yes," you must complete and attach Schedule A-1		<input checked="" type="checkbox"/>
3 Do you elect to pay the taxes in installments as described in section 6166? If "Yes," you must attach the additional information described in the instructions. Note. By electing section 6166 installment payments, you may be required to provide security for estate tax deferred under section 6166 and interest in the form of a surety bond or a section 6324A lien.		<input checked="" type="checkbox"/>
4 Do you elect to postpone the part of the taxes due to a reversionary or remainder interest as described in section 6163?		<input checked="" type="checkbox"/>

Part 4 - General Information

Note. Please attach the necessary supplemental documents. **You must attach the death certificate.** (See instructions)

Authorization to receive confidential tax information under Reg. section 601.504(b)(2)(i); to act as the estate's representative before the IRS; and to make written or oral presentations on behalf of the estate:

Name of representative (print or type)	State	Address (number, street, and room or suite no., city, state, and ZIP code)	
----------------------------------------	-------	----------------------------------------------------------------------------	--

I declare that I am the attorney/ certified public accountant/ enrolled agent (check the applicable box) for the executor. I am not under suspension or disbarment from practice before the Internal Revenue Service and am qualified to practice in the state shown above.

Signature	CAF number	Date	Telephone number
			- -

1 Death certificate number and issuing authority (attach a copy of the death certificate to this return).

FLA 6666 Florida Department of Health and Vital Statistics

2 Decedent's business or occupation. If retired, check here and state decedent's former business or occupation.

Restaurateur, Actress, Housewife

3a Marital status of the decedent at time of death:

Married Widow/widower Single Legally separated Divorced

3b For all prior marriages, list the name and SSN of the former spouse, the date the marriage ended, and whether the marriage ended by annulment, divorce, or death. Attach additional statements of the same size if necessary.

4a Surviving spouse's name Fred M. Crooger	4b Social security number 222-22-2222	4c Amount received (see instructions) 8,450,000
------------------------------------------------------	-------------------------------------------------	-----------------------------------------------------------

5 Individuals (other than the surviving spouse), trusts, or other estates who receive benefits from the estate (do not include charitable beneficiaries shown in Schedule O) (see instructions).

Name of individual, trust, or estate receiving \$5,000 or more	Identifying number	Relationship to decedent	Amount (see instructions)
Jiggy Vanderflatts	666-66-6666	Son	1,000,000

All unascertainable beneficiaries and those who receive less than \$5,000	0
Total	1,000,000

If you answer "Yes" to any of the following questions, you must attach additional information as described.

	Yes	No
6 Is the estate filing a protective claim for refund? If "Yes," complete and attach two copies of Schedule PC for each claim.		<input checked="" type="checkbox"/>
7 Does the gross estate contain any section 2044 property (qualified terminable interest property (QTIP) from a prior gift or estate)? (see instructions)		<input checked="" type="checkbox"/>
8a Have federal gift tax returns ever been filed? If "Yes," attach copies of the returns, if available, and furnish the following information:		<input checked="" type="checkbox"/>
b Period(s) covered	c Internal Revenue office(s) where filed	
9a Was there any insurance on the decedent's life that is not included on the return as part of the gross estate?		<input checked="" type="checkbox"/>
b Did the decedent own any insurance on the life of another that is not included in the gross estate?		<input checked="" type="checkbox"/>

Decedent's social security number

Estate of: Lisa Vanderflatts

888-88-7777

Part 4 - General Information (continued)

If you answer "Yes" to any of the following questions, you must attach additional information as described.		Yes	No
10	Did the decedent at the time of death own any property as a joint tenant with right of survivorship in which (a) one or more of the other joint tenants was someone other than the decedent's spouse, and (b) less than the full value of the property is included on the return as part of the gross estate? If "Yes," you must complete and attach Schedule E		X
11a	Did the decedent, at the time of death, own any interest in a partnership (for example, a family limited partnership), an unincorporated business, or a limited liability company; or own any stock in an inactive or closely held corporation?		X
	b If "Yes," was the value of any interest owned (from above) discounted on this estate tax return? If "Yes," see the instructions on reporting the total accumulated or effective discounts taken on Schedule F or G		X
12	Did the decedent make any transfer described in sections 2035, 2036, 2037, or 2038? (see instructions) If "Yes," you must complete and attach Schedule G		X
13a	Were there in existence at the time of the decedent's death any trusts created by the decedent during his or her lifetime?		X
	b Were there in existence at the time of the decedent's death any trusts not created by the decedent under which the decedent possessed any power, beneficial interest, or trusteeship?		X
	c Was the decedent receiving income from a trust created after October 22, 1986, by a parent or grandparent? If "Yes," was there a GST taxable termination (under section 2612) on the death of the decedent?		X
	d If there was a GST taxable termination (under section 2612), attach a statement to explain. Provide a copy of the trust or will creating the trust, and give the name, address, and phone number of the current trustee(s).		
	e Did the decedent at any time during his or her lifetime transfer or sell an interest in a partnership, limited liability company, or closely held corporation to a trust described in lines 13a or 13b? If "Yes," provide the EIN for this transferred/sold item. ▶		X
14	Did the decedent ever possess, exercise, or release any general power of appointment? If "Yes," you must complete and attach Schedule H		X
15	Did the decedent have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account, or other financial account?		X
16	Was the decedent, immediately before death, receiving an annuity described in the "General" paragraph of the instructions for Schedule I or a private annuity? If "Yes," you must complete and attach Schedule I		X
17	Was the decedent ever the beneficiary of a trust for which a deduction was claimed by the estate of a predeceased spouse under section 2056(b)(7) and which is not reported on this return? If "Yes," attach an explanation		X

Part 5 - Recapitulation. Note. If estimating the value of one or more assets pursuant to the special rule of Reg. section 20.2010-2T(a)(7)(ii), enter on both lines 10 and 23 the amount noted in the instructions for the corresponding range of values. (See instructions for details.)

Item no.	Gross estate	Alternate value	Value at date of death
1	Schedule A - Real Estate	1	0
2	Schedule B - Stocks and Bonds	2	9,500,000
3	Schedule C - Mortgages, Notes, and Cash	3	0
4	Schedule D - Insurance on the Decedent's Life (attach Form(s) 712)	4	0
5	Schedule E - Jointly Owned Property (attach Form(s) 712 for life insurance)	5	0
6	Schedule F - Other Miscellaneous Property (attach Form(s) 712 for life insurance)	6	0
7	Schedule G - Transfers During Decedent's Life (att. Form(s) 712 for life insurance)	7	0
8	Schedule H - Powers of Appointment	8	0
9	Schedule I - Annuities	9	0
10	Estimated value of assets subject to the special rule of Reg. section 20.2010-2T(a)(7)(ii)	10	
11	Total gross estate (add items 1 through 10)	11	9,500,000
12	Schedule U - Qualified Conservation Easement Exclusion	12	0
13	Total gross estate less exclusion (subtract item 12 from item 11). Enter here and on line 1 of Part 2 - Tax Computation	13	9,500,000

Item no.	Deductions	Amount
14	Schedule J - Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims	14 50,000
15	Schedule K - Debts of the Decedent	15 0
16	Schedule K - Mortgages and Liens	16 0
17	Total of items 14 through 16	17 50,000
18	Allowable amount of deductions from item 17 (see the instructions for item 18 of the Recapitulation)	18 50,000
19	Schedule L - Net Losses During Administration	19 0
20	Schedule L - Expenses Incurred in Administering Property Not Subject to Claims	20 0
21	Schedule M - Bequests, etc., to Surviving Spouse	21 8,450,000
22	Schedule O - Charitable, Public, and Similar Gifts and Bequests	22 0
23	Estimated value of deductible assets subject to the special rule of Reg. section 20.2010-2T(a)(7)(ii)	23
24	Tentative total allowable deductions (add items 18 through 23). Enter here and on line 2 of the Tax Computation	24 8,500,000

Estate of: Lisa Vanderflatts Decedent's social security number 888-88-7777

Part 6 - Portability of Deceased Spousal Unused Exclusion (DSUE)

Portability Election

A decedent with a surviving spouse elects portability of the deceased spousal unused exclusion (DSUE) amount, if any, by completing and timely-filing this return. No further action is required to elect portability of the DSUE amount to allow the surviving spouse to use the decedent's DSUE amount.

Section A. Opting Out of Portability

The estate of a decedent with a surviving spouse may opt out of electing portability of the DSUE amount. Check here and do not complete Sections B and C of Part 6 only if the estate opts NOT to elect portability of the DSUE amount.

Section B. QDOT

Are any assets of the estate being transferred to a qualified domestic trust (QDOT)? Yes No

If "Yes," the DSUE amount portable to a surviving spouse (calculated in Section C, below) is preliminary and shall be redetermined at the time of the final distribution or other taxable event imposing estate tax under section 2056A. See instructions for more details.

Section C. DSUE Amount Portable to the Surviving Spouse (To be completed by the estate of a decedent making a portability election.)

Complete the following calculation to determine the DSUE amount that can be transferred to the surviving spouse.

Table with 10 rows for calculations: 1 Enter the amount from line 9c, Part 2 - Tax Computation (5,430,000), 2 Reserved, 3 Enter the value of the cumulative lifetime gifts on which tax was paid or payable (0), 4 Add lines 1 and 3 (5,430,000), 5 Enter amount from line 10, Part 2 - Tax Computation (0), 6 Divide amount on line 5 by 40% (0.40) (0), 7 Subtract lines 6 from line 4 (5,430,000), 8 Enter the amount from line 5, Part 2 - Tax Computation (1,000,000), 9 Subtract line 8 from line 7 (4,430,000), 10 DSUE amount portable to surviving spouse (4,430,000)

Section D. DSUE Amount Received from Predeceased Spouse(s) (To be completed by the estate of a deceased surviving spouse with DSUE amount from predeceased spouse(s))

Provide the following information to determine the DSUE amount received from deceased spouses.

Table with 7 columns: A Name of Deceased Spouse, B Date of Death, C Portability Election Made?, D If "Yes," DSUE Amount Received from Spouse, E DSUE Amount Applied by Decedent to Lifetime Gifts, F Year of Form 709 Reporting Use of DSUE Amount, G Remaining DSUE Amount. Includes sections for Part 1 (Last Deceased Spouse) and Part 2 (Other Predeceased Spouse(s)).

Total (for all DSUE amounts from predeceased spouse(s) applied) ... Add the amount from Part 1, column D and the total from Part 2 column E. Enter the result on line 9b, Part 2-Tax Computation ... 0

Estate of:

Lisa Vanderflatts

Decedent's social security number

888-88-7777

SCHEDULE B - Stocks and Bonds

(For jointly owned property that must be disclosed on Schedule E, see instructions.)

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entries in the last four columns.

Item number	Description, including face amount of bonds or number of shares and par value for identification. Give CUSIP number. If trust, partnership, or closely held entity, give EIN	CUSIP number or EIN, where applicable	Unit value	Alternate valuation date	Alternate value	Value at date of death
1	Friendly Trust Company Brokerage Account 99-91234 Valuation attached		0.0000			9,500,000
Total from continuation schedules (or additional statements) attached to this schedule						0
TOTAL. (Also enter on Part 5 - Recapitulation, page 3, at item 2.)						9,500,000

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Estate of: Lisa Vanderflatts Decedent's social security number 888-88-7777

SCHEDULE J - Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims

▶ Use Schedule PC to make a protective claim for refund due to an expense not currently deductible.
 For such a claim, report the expense on Schedule J but without a value in the last column.

Note. Do not list expenses of administering property not subject to claims on this schedule. To report those expenses, see instructions.

If executors' commissions, attorney fees, etc., are claimed and allowed as a deduction for estate tax purposes, they are not allowable as a deduction in computing the taxable income of the estate for federal income tax purposes. They are allowable as an income tax deduction on Form 1041, U.S. Income Tax Return for Estates and Trusts, if a waiver is filed to forgo the deduction on Form 706 (see Instructions for Form 1041).

Are you aware of any actual or potential reimbursement to the estate for any expense claimed as a deduction on this schedule? Yes No
 If "Yes," attach a statement describing the expense(s) subject to potential reimbursement. (see instructions)

Item number	Description	Expense amount	Total amount
A. Funeral expenses:			
	None		
Total from continuation schedules		0	
Total funeral expenses			0

B. Administration expenses:

1 Executors' commissions - amount estimated/agreed upon/paid. (Strike out the words that do not apply.)	0
2 Attorney fees - amount estimated/agreed upon/paid. (Strike out the words that do not apply.)	50,000
3 Accountant fees - amount estimated/agreed upon/paid. (Strike out the words that do not apply.)	0

Item number	Description	Expense amount	Total amount
4 Miscellaneous expenses:			
	None		
Total miscellaneous expenses from continuation schedules (or additional statements) attached to this schedule		0	
Total miscellaneous expenses			0
TOTAL. (Also enter on Part 5 - Recapitulation, page 3, at item 14.)			50,000

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Computation of Residue

1. Gross Estate		9,500,000
2. Bequests / Devises		
Jiggy Vanderflatts	1,000,000	

Total Bequests/Devises		1,000,000
3. Debts & Administration expenses		
Gift tax paid within 3 years of death from schedule G	0	
Schedule J	50,000	
Schedule K	0	
Schedule L	0	
Transmission expenses deducted on 1041	0	

Total Debts & Administration Expenses		50,000
4. Adjustment to residue		0

5. Pre-tax residue before reduction for state estate taxes		8,450,000
6. State estate, inheritance, succession & other transfer taxes		0
7. Residue before reduction for federal estate & GST taxes		8,450,000
8. Federal estate & GST taxes		
Federal estate tax	0	
GST Taxes	0	

Total federal estate & GST taxes		0

9. Post-tax residue		8,450,000
		=====

United States Estate (and Generation-Skipping Transfer) Tax Return

OMB No. 1545-0015

Department of the Treasury
Internal Revenue Service

▶ **Estate of a citizen or resident of the United States (see instructions). To be filed for decedents dying after December 31, 2012.**
▶ **Information about Form 706 and its separate instructions is at www.irs.gov/form706.**

Part 1 - Decedent and Executor	1a Decedent's first name and middle initial (and maiden name, if any) Fred M		1b Decedent's last name Crooger		2 Decedent's social security no. 222-22-2222
	3a City, town, or post office; county; state or province; country; and ZIP or foreign postal code. Miami Miami-Dade FL 33154-		3b Year domicile established 1946	4 Date of birth 07/04/1946	5 Date of death 12/31/2015
	6a Name of executor (see instructions) Friendly Trust Company		6b Executor's address (number and street including apartment or suite no.; city, town, or post office; state or province; country; and ZIP or foreign postal code) and phone no. 45 Dolphin Drive Miami, FL 33514		
	6c Executor's social security number (see instructions) 99-9999996		Phone no. () -		
	6d If there are multiple executors, check here <input checked="" type="checkbox"/> and attach a list showing the names, addresses, telephone numbers, and SSNs of the additional executors.				
	7a Name and location of court where will was probated or estate administered Circuit Court of Dade County, Florida				7b Case number 552346
	8 If decedent died testate, check here <input checked="" type="checkbox"/> and attach a certified copy of the will.		9 If you extended the time to file this Form 706, check here <input checked="" type="checkbox"/>		
	10 If Schedule R-1 is attached, check here <input type="checkbox"/>		11 If you are estimating the value of assets included in the gross estate on line 1 pursuant to the special rule of Reg. section 20.2010-2T(a) (7)(i), check here <input type="checkbox"/>		

Part 2 - Tax Computation	1 Total gross estate less exclusion (from Part 5 - Recapitulation, item 13)	1	18,000,000
	2 Tentative total allowable deductions (from Part 5 - Recapitulation, item 24)	2	250,000
	3a Tentative taxable estate (subtract line 2 from line 1)	3a	17,750,000
	b State death tax deduction	3b	0
	c Taxable estate (subtract line 3b from line 3a)	3c	17,750,000
	4 Adjusted taxable gifts (see instructions)	4	2,000,000
	5 Add lines 3c and 4	5	19,750,000
	6 Tentative tax on the amount on line 5 from Table A in the instructions	6	7,845,800
	7 Total gift tax paid or payable (see instructions)	7	0
	8 Gross estate tax (subtract line 7 from line 6)	8	7,845,800
	9a Basic exclusion amount	9a	5,430,000
	9b Deceased spousal unused exclusion (DSUE) amount from predeceased spouse(s), if any (from Section D, Part 6 - Portability of Deceased Spousal Unused Exclusion)	9b	6,430,000
	9c Applicable exclusion amount (add lines 9a and 9b)	9c	11,860,000
	9d Applicable credit amount (tentative tax on the amount in 9c from Table A in the instructions)	9d	4,689,800
	10 Adjustment to applicable credit amount (May not exceed \$6,000. See instructions.)	10	0
	11 Allowable applicable credit amount (subtract line 10 from line 9d)	11	4,689,800
	12 Subtract line 11 from line 8 (but do not enter less than zero)	12	3,156,000
	13 Credit for foreign death taxes (from Schedule P). (Attach Form(s) 706-CE.)	13	0
	14 Credit for tax on prior transfers (from Schedule Q)	14	0
	15 Total credits (add lines 13 and 14)	15	0
16 Net estate tax (subtract line 15 from line 12)	16	3,156,000	
17 Generation-skipping transfer (GST) taxes payable (from Schedule R, Part 2, line 10)	17	0	
18 Total transfer taxes (add lines 16 and 17)	18	3,156,000	
19 Prior payments (explain in an attached statement)	19	0	
20 Balance due (or overpayment) (subtract line 19 from line 18)	20	3,156,000	

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer other than the executor is based on all information of which preparer has any knowledge.

Sign Here		

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

Decedent's social security number
222-22-2222

Estate of: Fred M Crooger

Part 3 - Elections by the Executor

Note. For information on electing portability of the decedent's DSUE amount, including how to opt out of the election, see Part 6-Portability of Deceased Spousal Unused Exclusion.

Note. Some of the following elections may require the posting of bonds or liens.

Please check "Yes" or "No" box for each question (see instructions).

	Yes	No
1 Do you elect alternate valuation?		<input checked="" type="checkbox"/>
2 Do you elect special-use valuation? If "Yes," you must complete and attach Schedule A-1		<input checked="" type="checkbox"/>
3 Do you elect to pay the taxes in installments as described in section 6166? If "Yes," you must attach the additional information described in the instructions. Note. By electing section 6166 installment payments, you may be required to provide security for estate tax deferred under section 6166 and interest in the form of a surety bond or a section 6324A lien.		<input checked="" type="checkbox"/>
4 Do you elect to postpone the part of the taxes due to a reversionary or remainder interest as described in section 6163?		<input checked="" type="checkbox"/>

Part 4 - General Information

Note. Please attach the necessary supplemental documents. **You must attach the death certificate.** (See instructions)

Authorization to receive confidential tax information under Reg. section 601.504(b)(2)(i); to act as the estate's representative before the IRS; and to make written or oral presentations on behalf of the estate:

Name of representative (print or type)	State	Address (number, street, and room or suite no., city, state, and ZIP code)	
----------------------------------------	-------	----------------------------------------------------------------------------	--

I declare that I am the attorney/ certified public accountant/ enrolled agent (check the applicable box) for the executor. I am not under suspension or disbarment from practice before the Internal Revenue Service and am qualified to practice in the state shown above.

Signature	CAF number	Date	Telephone number
			- -

1 Death certificate number and issuing authority (attach a copy of the death certificate to this return).

FLA 12354 Florida Department of Health and Vital Statistics

2 Decedent's business or occupation. If retired, check here and state decedent's former business or occupation.

Actor

3a Marital status of the decedent at time of death:

Married Widow/widower Single Legally separated Divorced

3b For all prior marriages, list the name and SSN of the former spouse, the date the marriage ended, and whether the marriage ended by annulment, divorce, or death. Attach additional statements of the same size if necessary.

1. Lori Silpada, Date of Death: 1/3/14 999-99-9991

2. Lisa Vanderflatts, Date of Death: 2/2/2015 888-88-7777

4a Surviving spouse's name None	4b Social security number	4c Amount received (see instructions) 0
-------------------------------------------	---------------------------	---------------------------------------------------

5 Individuals (other than the surviving spouse), trusts, or other estates who receive benefits from the estate (do not include charitable beneficiaries shown in Schedule O) (see instructions).

Name of individual, trust, or estate receiving \$5,000 or more	Identifying number	Relationship to decedent	Amount (see instructions)
Janet Crooger	987-65-4321	Daughter	17,750,000

All unascertainable beneficiaries and those who receive less than \$5,000	0
Total	17,750,000

If you answer "Yes" to any of the following questions, you must attach additional information as described.

	Yes	No
6 Is the estate filing a protective claim for refund? If "Yes," complete and attach two copies of Schedule PC for each claim.		<input checked="" type="checkbox"/>
7 Does the gross estate contain any section 2044 property (qualified terminable interest property (QTIP) from a prior gift or estate)? (see instructions)		<input checked="" type="checkbox"/>
8a Have federal gift tax returns ever been filed? If "Yes," attach copies of the returns, if available, and furnish the following information:	<input checked="" type="checkbox"/>	
b Period(s) covered	c Internal Revenue office(s) where filed	
See Attached	See Attached	
9a Was there any insurance on the decedent's life that is not included on the return as part of the gross estate?		<input checked="" type="checkbox"/>
b Did the decedent own any insurance on the life of another that is not included in the gross estate?		<input checked="" type="checkbox"/>

Estate of: Fred M Crooger

222-22-2222

Page 2, Part 4 - General Information, lines 8b and 8c

2014 Cincinnati, OH

Decedent's social security number

Estate of: **Fred M Crooger**

222-22-2222

Part 4 - General Information (continued)

If you answer "Yes" to any of the following questions, you must attach additional information as described.		Yes	No
10	Did the decedent at the time of death own any property as a joint tenant with right of survivorship in which (a) one or more of the other joint tenants was someone other than the decedent's spouse, and (b) less than the full value of the property is included on the return as part of the gross estate? If "Yes," you must complete and attach Schedule E		X
11a	Did the decedent, at the time of death, own any interest in a partnership (for example, a family limited partnership), an unincorporated business, or a limited liability company; or own any stock in an inactive or closely held corporation?		X
	b If "Yes," was the value of any interest owned (from above) discounted on this estate tax return? If "Yes," see the instructions on reporting the total accumulated or effective discounts taken on Schedule F or G		X
12	Did the decedent make any transfer described in sections 2035, 2036, 2037, or 2038? (see instructions) If "Yes," you must complete and attach Schedule G		X
13a	Were there in existence at the time of the decedent's death any trusts created by the decedent during his or her lifetime?		X
	b Were there in existence at the time of the decedent's death any trusts not created by the decedent under which the decedent possessed any power, beneficial interest, or trusteeship?		X
	c Was the decedent receiving income from a trust created after October 22, 1986, by a parent or grandparent? If "Yes," was there a GST taxable termination (under section 2612) on the death of the decedent?		X
	d If there was a GST taxable termination (under section 2612), attach a statement to explain. Provide a copy of the trust or will creating the trust, and give the name, address, and phone number of the current trustee(s).		
	e Did the decedent at any time during his or her lifetime transfer or sell an interest in a partnership, limited liability company, or closely held corporation to a trust described in lines 13a or 13b? If "Yes," provide the EIN for this transferred/sold item. ▶		X
14	Did the decedent ever possess, exercise, or release any general power of appointment? If "Yes," you must complete and attach Schedule H		X
15	Did the decedent have an interest in or a signature or other authority over a financial account in a foreign country, such as a bank account, securities account, or other financial account?		X
16	Was the decedent, immediately before death, receiving an annuity described in the "General" paragraph of the instructions for Schedule I or a private annuity? If "Yes," you must complete and attach Schedule I		X
17	Was the decedent ever the beneficiary of a trust for which a deduction was claimed by the estate of a predeceased spouse under section 2056(b)(7) and which is not reported on this return? If "Yes," attach an explanation		X

Part 5 - Recapitulation. Note. If estimating the value of one or more assets pursuant to the special rule of Reg. section 20.2010-2T(a)(7)(ii), enter on both lines 10 and 23 the amount noted in the instructions for the corresponding range of values. (See instructions for details.)

Item no.	Gross estate	Alternate value	Value at date of death
1	Schedule A - Real Estate	1	0
2	Schedule B - Stocks and Bonds	2	0
3	Schedule C - Mortgages, Notes, and Cash	3	18,000,000
4	Schedule D - Insurance on the Decedent's Life (attach Form(s) 712)	4	0
5	Schedule E - Jointly Owned Property (attach Form(s) 712 for life insurance)	5	0
6	Schedule F - Other Miscellaneous Property (attach Form(s) 712 for life insurance)	6	0
7	Schedule G - Transfers During Decedent's Life (att. Form(s) 712 for life insurance)	7	0
8	Schedule H - Powers of Appointment	8	0
9	Schedule I - Annuities	9	0
10	Estimated value of assets subject to the special rule of Reg. section 20.2010-2T(a)(7)(ii)	10	
11	Total gross estate (add items 1 through 10)	11	18,000,000
12	Schedule U - Qualified Conservation Easement Exclusion	12	0
13	Total gross estate less exclusion (subtract item 12 from item 11). Enter here and on line 1 of Part 2 - Tax Computation	13	18,000,000
Item no.	Deductions	Amount	
14	Schedule J - Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims	14	250,000
15	Schedule K - Debts of the Decedent	15	0
16	Schedule K - Mortgages and Liens	16	0
17	Total of items 14 through 16	17	250,000
18	Allowable amount of deductions from item 17 (see the instructions for item 18 of the Recapitulation)	18	250,000
19	Schedule L - Net Losses During Administration	19	0
20	Schedule L - Expenses Incurred in Administering Property Not Subject to Claims	20	0
21	Schedule M - Bequests, etc., to Surviving Spouse	21	0
22	Schedule O - Charitable, Public, and Similar Gifts and Bequests	22	0
23	Estimated value of deductible assets subject to the special rule of Reg. section 20.2010-2T(a)(7)(ii)	23	
24	Tentative total allowable deductions (add items 18 through 23). Enter here and on line 2 of the Tax Computation	24	250,000

Decedent's social security number		
222	22	2222

Estate of: Fred M Crooger

Part 6—Portability of Deceased Spousal Unused Exclusion (DSUE)

Portability Election

A decedent with a surviving spouse elects portability of the deceased spousal unused exclusion (DSUE) amount, if any, by completing and timely-filing this return. No further action is required to elect portability of the DSUE amount to allow the surviving spouse to use the decedent's DSUE amount.

Section A. Opting Out of Portability

The estate of a decedent with a surviving spouse may opt out of electing portability of the DSUE amount. Check here and do not complete Sections B and C of Part 6 only if the estate opts **NOT** to elect portability of the DSUE amount.

Section B. QDOT

Are any assets of the estate being transferred to a qualified domestic trust (QDOT)?

Yes	No

 If "Yes," the DSUE amount portable to a surviving spouse (calculated in Section C, below) is preliminary and shall be redetermined at the time of the final distribution or other taxable event imposing estate tax under section 2056A. See instructions for more details.

Section C. DSUE Amount Portable to the Surviving Spouse (To be completed by the estate of a decedent making a portability election.)

Complete the following calculation to determine the DSUE amount that can be transferred to the surviving spouse.

1	Enter the amount from line 9c, Part 2—Tax Computation	1		
2	Reserved	2		
3	Enter the value of the cumulative lifetime gifts on which tax was paid or payable (see instructions)	3		
4	Add lines 1 and 3	4		
5	Enter amount from line 10, Part 2—Tax Computation	5		
6	Divide amount on line 5 by 40% (0.40) (do not enter less than zero)	6		
7	Subtract line 6 from line 4	7		
8	Enter the amount from line 5, Part 2—Tax Computation	8		
9	Subtract line 8 from line 7 (do not enter less than zero)	9		
10	DSUE amount portable to surviving spouse (Enter lesser of line 9 or line 9a, Part 2—Tax Computation)	10		

Section D. DSUE Amount Received from Predeceased Spouse(s) (To be completed by the estate of a deceased surviving spouse with DSUE amount from predeceased spouse(s))

Provide the following information to determine the DSUE amount received from deceased spouses.

A Name of Deceased Spouse (dates of death after December 31, 2010, only)	B Date of Death (enter as mm/dd/yy)	C Portability Election Made?		D If "Yes," DSUE Amount Received from Spouse	E DSUE Amount Applied by Decedent to Lifetime Gifts	F Year of Form 709 Reporting Use of DSUE Amount Listed in col E	G Remaining DSUE Amount, if any (subtract col. E from col. D)
		Yes	No				
Part 1 — DSUE RECEIVED FROM LAST DECEASED SPOUSE							
Lisa Vanderflatts	2/2/2015	✓		4,430,000	0	0	4,430,000
Part 2 — DSUE RECEIVED FROM OTHER PREDECEASED SPOUSE(S) AND USED BY DECEDENT							
Lori Silpada	1/3/2014	✓		3,340,000	2,000,000	2014	
Total (for all DSUE amounts from predeceased spouse(s) applied)					2,000,000		

Add the amount from Part 1, column D and the total from Part 2, column E. Enter the result on line 9b, Part 2—Tax Computation ▶ 6,430,000

Estate of:

Fred M Crooger

Decedent's social security number

222-22-2222

SCHEDULE C - Mortgages, Notes, and Cash

(For jointly owned property that must be disclosed on Schedule E, see instructions.)

Note. If the value of the gross estate, together with the amount of adjusted taxable gifts, is less than the basic exclusion amount and the Form 706 is being filed solely to elect portability of the DSUE amount, consideration should be given as to whether you are required to report the value of assets eligible for the marital or charitable deduction on this schedule. See the instructions and Reg. section 20.2010-2T (a)(7)(ii) for more information. If you are not required to report the value of an asset, identify the property but make no entries in the last three columns.

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
1	Cash under mattress			18,000,000
Total from continuation schedules (or additional statements) attached to this schedule				0
TOTAL. (Also enter on Part 5 - Recapitulation, page 3, at item 3.)				18,000,000

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Estate of: <u>Fred M Crooger</u>	Decedent's social security number <u>222-22-2222</u>
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SCHEDULE J - Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims

▶ Use Schedule PC to make a protective claim for refund due to an expense not currently deductible.
For such a claim, report the expense on Schedule J but without a value in the last column.

Note. Do not list expenses of administering property not subject to claims on this schedule. To report those expenses, see instructions.

If executors' commissions, attorney fees, etc., are claimed and allowed as a deduction for estate tax purposes, they are not allowable as a deduction in computing the taxable income of the estate for federal income tax purposes. They are allowable as an income tax deduction on Form 1041, U.S. Income Tax Return for Estates and Trusts, if a waiver is filed to forgo the deduction on Form 706 (see Instructions for Form 1041).

Are you aware of any actual or potential reimbursement to the estate for any expense claimed as a deduction on this schedule?	Yes	No
If "Yes," attach a statement describing the expense(s) subject to potential reimbursement. (see instructions)		

Item number	Description	Expense amount	Total amount
	A. Funeral expenses:		
	None		
	Total from continuation schedules	0	
	Total funeral expenses		0

B. Administration expenses:

1 Executors' commissions - amount estimated/agreed upon/paid. (Strike out the words that do not apply.)	125,000
2 Attorney fees - amount estimated/agreed upon/paid. (Strike out the words that do not apply.)	125,000
3 Accountant fees - amount estimated/agreed upon/paid. (Strike out the words that do not apply.)	0

Item number	Description	Expense amount	Total amount
	4 Miscellaneous expenses:		
	None		
	Total miscellaneous expenses from continuation schedules (or additional statements) attached to this schedule	0	
	Total miscellaneous expenses		0
	TOTAL. (Also enter on Part 5 - Recapitulation, page 3, at item 14.)		250,000

(If more space is needed, attach the continuation schedule from the end of this package or additional statements of the same size.)

Computation of Residue

1. Gross Estate		18,000,000
2. Bequests / Devises		
Total Bequests/Devises		0
3. Debts & Administration expenses		
Gift tax paid within 3 years of death from schedule G	0	
Schedule J	250,000	
Schedule K	0	
Schedule L	0	
Transmission expenses deducted on 1041	0	
Total Debts & Administration Expenses	-----	250,000
4. Adjustment to residue		0
5. Pre-tax residue before reduction for state estate taxes		17,750,000
6. State estate, inheritance, succession & other transfer taxes		0
7. Residue before reduction for federal estate & GST taxes		17,750,000
8. Federal estate & GST taxes		
Federal estate tax	3,156,000	
GST Taxes	0	
Total federal estate & GST taxes	-----	3,156,000
9. Post-tax residue		14,594,000
		=====

Worksheet TG - Taxable Gifts Reconciliation

Total taxable gifts made before 1977 0

Line 4 - Taxable gifts made after 1976

Calendar year or quarter (a)	Total taxable gifts for period (b)	Taxable amount included in gross estate (c)	Amount qualifying as special treatment gifts (d)	Gift tax paid by decedent (e)	Gift tax paid by spouse (f)
2014	2,000,000	0	0	0	0
Totals	2,000,000	0	0	0	0

1. Taxable gifts made after 1976 (from column b)					2,000,000
2. Taxable gifts made after 1976 included in gross estate (from column c)				0	
3. Taxable gifts made after 1976 that qualify for "special treatment" (from column d)				0	
4. Add lines 2 and 3					0
5. Adjusted taxable gifts					2,000,000

Worksheet TG - Taxable Gifts Reconciliation

Line 7 Worksheet Part A

(a) Tax Period	Pre-1977	2014
(b) Taxable Gifts for Applicable Period	0	2,000,000
(c) Taxable Gifts for Prior Periods	-	0
(d) Cumulative Taxable Gifts Including Applicable Period	0	2,000,000
(e) Tax at Date of Death Rates for Prior Gifts	-	0
(f) Tax at Date of Death Rates for Cumulative Gifts including Applicable Period	0	745,800
(g) Tax at Date of Death Rates for Gifts in Applicable Period	-	745,800
(h) Total DSUE applied from Prior Periods and Applicable Period	-	2,000,000
(i) Basic Exclusion Amount for Applicable Period	-	5,340,000
(j) Basic Exclusion amount plus Total DSUE applied in prior periods and applicable period	-	7,340,000
(k) Maximum Applicable Credit amount based on Row (j)	-	2,881,800
(l) Applicable Credit amount used in Prior Periods	-	0
(m) Available Credit in Applicable Period	-	2,881,800
(n) Credit Allowable	-	745,800
(o) Tax paid or payable at Date of Death rates for Applicable Period	-	0
(p) Tax on Cumulative Gifts less tax paid or payable for Applicable Period	-	745,800
(q) Cumulative Taxable Gifts less Gifts in the Applicable Period on which tax was paid or payable based on Row (p)	-	2,000,000
(r) Gifts in the Applicable Period on which tax was payable	-	0

Line 7 Worksheet Part B

1. Total gift taxes payable on gifts made after 1976 (add amounts in row (o))	0
2. Gift tax paid by the decedent on gifts that qualify for "special treatment" (from Line 4 worksheet, column e)	0
3. Subtract line 2 from line 1	0
4. Gift tax paid by the decedent's spouse on split gifts (from Line 4 worksheet, column f)	0
5. Add lines 3 and 4. Enter here and on Part 2-Tax Computation, line 7	0
6. Cumulative lifetime gifts on which tax was paid or payable. Enter this amount on line 3, Section C, Part 6 of Form 706. (sum of amounts in Row (r))	0