

Estate Tax

IRS

Estate Tax Extension

Application for Extension of Time To File a Return and/or Pay U.S. Estate (and Generation-Skipping Transfer) Taxes

OMB No. 1545-0181
Expires 7-31-93

Department of the Treasury
Internal Revenue Service

(For filers of Forms 706, 706-A, and 706NA)

Note: Use Form 2758 to request an extension for Forms 706GS(D) and 706GS(T).

Part I Identification

Decedent's first name and middle initial Jean M.	Decedent's last name O'Connell	Date of death Sept. 15, 1991
Name of application filer Edward J. White and Jean M. Nader, Co-Executors		Decedent's social security number 230 50 6044
Address of application filer (Number and street) 118 South Royal St.		Estate tax return due date June 15, 1992
City, state, and ZIP code Alexandria, Va. 22314		

Part II Extension of Time To File (Sec. 6081)

You must attach your written statement to explain in detail why it is impossible or impractical to file a reasonably complete return within 9 months after the date of the decedent's death	Extension date requested Sept. 15, 1992
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Part III Extension of Time To Pay (Sec. 6161)

You must attach your written statement to explain in detail why it is impossible or impractical to pay the full amount of the estate (or GST) tax by the return due date. If the taxes cannot be determined because the size of the gross estate is unascertainable, check here <input type="checkbox"/> and enter ".0." or other appropriate amount on Part IV, line 3. You must attach an explanation	Extension date requested
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Part IV Payment To Accompany Extension Request

1 Amount of estate and GST taxes estimated to be due	1	175,000	
2 Amount of cash shortage (complete Part III)	2		
3 Balance due (subtract line 2 from line 1) (Pay with this application.)	3	175,000	

Signature and Verification

If filed by executor—Under penalties of perjury, I declare that to the best of my knowledge and belief, the statements made herein and attached are true and correct.

Edward J. White
 Executor's signature
EDWARD J. WHITE

..... Co-Executors June 11, 1992 ..
 Title Date

If filed by someone other than the executor—Under penalties of perjury, I declare that to the best of my knowledge and belief, the statements made herein and attached are true and correct, that I am authorized by the executor to file this application, and that I am (check box(es) that applies):

- A member in good standing of the bar of the highest court of (specify jurisdiction) ▶
- A certified public accountant duly qualified to practice in (specify jurisdiction) ▶
- A person enrolled to practice before the Internal Revenue Service
- A duly authorized agent holding a power of attorney. (The power of attorney need not be submitted unless requested.)

Filer's signature (other than the executor)

Date

Part V Notice to Applicant—To be completed by Internal Revenue Service

1 The application for extension of time to file (Part II) is: <input type="checkbox"/> Approved <input type="checkbox"/> Not approved because	2 The application for extension of time to pay (Part III) is: <input type="checkbox"/> Approved <input type="checkbox"/> Not approved because
<input type="checkbox"/> Other	<input type="checkbox"/> Other

Internal Revenue Service official	Date	Internal Revenue Service official	Date
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ESTATE OF JEAN M. O'CONNELL

PART II EXTENSION OF TIME TO FILE

1. The decedent was a part owner of a tract of ground the value of which is to be determined by an appraisal in progress. The enclosed payment is based on the maximum value for the property and will be changed.

2. The estate does not at this date possess full data for certain gifts and debts of the estate and other needed information.

Application for Extension of Time To File a Return and/or Pay U.S. Estate (and Generation-Skipping Transfer) Taxes

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Rev. August 1990

Department of the Treasury Internal Revenue Service

(For filers of Forms 706, 706-A, and 706NA)

Note: Use Form 2758 to request an extension for Forms 706GS(D) and 706GS(T).

Part I Identification

Decedent's first name and middle initial: Jean M. Decedent's last name: O'Connell Date of death: Sept. 15, 1991 Name of application filer: Edward J. White and Jean M. Nader, Co-Executors Decedent's social security number: 230 50 6044 Address of application filer: 118 South Royal St. Estate tax return due date: June 15, 1992 City, state, and ZIP code: Alexandria, Va. 22314

Part II Extension of Time To File (Sec. 6081)

You must attach your written statement to explain in detail why it is impossible or impractical to file a reasonably complete return within 9 months after the date of the decedent's death. Extension date requested: Sept. 15, 1992

Part III Extension of Time To Pay (Sec. 6161)

You must attach your written statement to explain in detail why it is impossible or impractical to pay the full amount of the estate (or GST) tax by the return due date. Extension date requested: [blank]

Part IV Payment To Accompany Extension Request

Table with 3 rows: 1 Amount of estate and GST taxes estimated to be due: 119,000; 2 Amount of cash shortage (complete Part III); 3 Balance due (subtract line 2 from line 1) (Pay with this application.): 119,000

Signature and Verification

If filed by executor—Under penalties of perjury, I declare that to the best of my knowledge and belief, the statements made herein and attached are true and correct.

Signature: Edward J. White, Jean M. Nader Co-Executors Date: June 11, 1992

If filed by someone other than the executor—Under penalties of perjury, I declare that to the best of my knowledge and belief, the statements made herein and attached are true and correct, that I am authorized by the executor to file this application, and that I am (check box(es) that applies):

- A member in good standing of the bar of the highest court of (specify jurisdiction)
A certified public accountant duly qualified to practice in (specify jurisdiction)
A person enrolled to practice before the Internal Revenue Service.
A duly authorized agent holding a power of attorney. (The power of attorney need not be submitted unless requested.)

Filer's signature (other than the executor)

Date

Part V Notice to Applicant—To be completed by Internal Revenue Service

1 The application for extension of time to file (Part II) is: [] Approved [] Not approved because [] Other
2 The application for extension of time to pay (Part III) is: [] Approved [] Not approved because [] Other

Internal Revenue Service official Date Internal Revenue Service official Date

4768

Application for Extension of Time To File a Return and/or Pay U.S. Estate (and Generation-Skipping Transfer) Taxes

OMB No. 1545-0181 Expires 7-31-93

(Rev. August 1990)

Department of the Treasury Internal Revenue Service

(For filers of Forms 706, 706-A, and 706NA)

Note: Use Form 2758 to request an extension for Forms 706GS(D) and 706GS(T).

Part I Identification

Decedent's first name and middle initial: Jean M. Decedent's last name: O'Connell Date of death: Sept. 15, 1991 Name of application filer: Edward J. White and Jean M. Nader, Co-Executors Decedent's social security number: 230 50 6044 Address of application filer: 118 South Royal St. City, state, and ZIP code: Alexandria, Va. 22314

Part II Extension of Time To File (Sec. 6081)

Written statement to explain in detail why it is impossible or impractical to file by the date of the decedent's death. Extension date requested: Sept. 15, 1992

Form 2363 (Rev. 12-79) Use "Rev. 10-78" first. Includes sections for Name Control, Filing Requirements, and Name Lines. Includes handwritten entries for DLN and various codes.

Prepared by: [Signature] Org: [Signature] State: VA ZIP Code: 22314 DO Area: [Signature] Prepared from (Doc and DLN): [Signature] Routing to: [Signature]

Internal Revenue Service official: [Signature] Date: 7-15-92 Internal Revenue Service official: [Signature] Date: [Signature]

Estate Tax Return

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

Estate of a citizen or resident of the United States (see separate instructions). To be filed for decedents dying after December 31, 1989, and before January 1, 1993. For Paperwork Reduction Act Notice, see page 1 of the instructions.

Part 1 - Decedent and Executor. 1a Decedent's first name and middle initial (and maiden name, if any) Jean M. 1b Decedent's last name O'Connell 2 Decedent's social security no. 230 50 6044 3a Domicile at time of death (county and state) Fairfax County, Virginia 3b Year domicile established pre 1960 4 Date of birth 2/1/12 5 Date of death 9/15/91 6a Name of executor (see instructions) Edward J. White Co-Executor 6b Executor's address (number and street including apartment number or rural route; city, town, or post office; state; and ZIP code) 118 South Royal St. Alexandria, Va. 22314 7a Name and location of court where will was probated or estate administered Circuit Court Fairfax Co., Va. 7b Case number 49160 8 If decedent died testate, check here [X] and attach a certified copy of the will. 9 If Form 4768 is attached, check here [X] 10 If Schedule R-1 is attached, check here []

Part 2 - Tax Computation. Table with 28 rows and 3 columns. Row 1: Total gross estate 1,041,017.55. Row 2: Total allowable deductions 108,803.52. Row 3: Taxable estate 932,214.03. Row 4: Adjusted taxable gifts 42,600.00. Row 5: Add lines 3 and 4 974,814.03. Row 6: Tentative tax on the amount on line 5 from Table A in the instructions 335,977.47. Row 7a: If line 5 exceeds \$10,000,000, enter the lesser of line 5 or \$21,040,000. Row 7b: Subtract \$10,000,000 from line 7a. Row 7c: Enter 5% (.05) of line 7b. Row 8: Total tentative tax (add lines 6 and 7c) 335,977.47. Row 9: Total gift tax payable with respect to gifts made by the decedent after December 31, 1976. Row 10: Gross estate tax (subtract line 9 from line 8) 327,153.47. Row 11: Unified credit against estate tax from Table B in the instructions 192,800. Row 12: Adjustment to unified credit. (This adjustment may not exceed \$6,000. See instructions.) Row 13: Allowable unified credit (subtract line 12 from line 11) 192,800.00. Row 14: Subtract line 13 from line 10 (but do not enter less than zero) 134,353.47. Row 15: Credit for state death taxes. Do not enter more than line 14. Compute credit by using amount on line 3 less \$60,000. See Table C in the instructions and attach credit evidence (see instructions) 29,403.99. Row 16: Subtract line 15 from line 14 104,949.99. Row 17: Credit for Federal gift taxes on pre-1977 gifts (section 2012)(attach computation) Row 18: Credit for foreign death taxes (from Schedule(s) P). (Attach Form(s) 706CE) Row 19: Credit for tax on prior transfers (from Schedule Q). Row 20: Total (add lines 17, 18, and 19) Row 21: Net estate tax (subtract line 20 from line 16) 104,949.99. Row 22: Generation-skipping transfer taxes (from Schedule R, Part 2, line 10) Row 23: Section 4980A increased estate tax (from Schedule S, Part I, line 17) (see instructions) Row 24: Total transfer taxes (add lines 21, 22, and 23) 175,000.00. Row 25: Prior payments. Explain in an attached statement. Row 26: United States Treasury bonds redeemed in payment of estate tax. Row 27: Total (add lines 25 and 26) 175,000.00. Row 28: Balance due (or overpayment) (subtract line 27 from line 24). OVERPAYMENT (70,050.51)

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.

Signature(s) of executor(s) [Signature] Date 9/2/92 9-8-92

Signature of preparer other than executor Address (and ZIP code) Date

Estate of: JEAN M. O'CONNELL

Part 3.—Elections by the Executor

Please check the "Yes" or "No" box for each question.		Yes	No
1	Do you elect alternate valuation?		X
2	Do you elect special use valuation? If "Yes," you must complete and attach Schedule A-1		X
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.		X
4	Do you elect to postpone the part of the taxes attributable to a reversionary or remainder interest as described in section 6163?		X

Part 4.—General Information (Note: Please attach the necessary supplemental documents. You must attach the death certificate.)

Authorization to receive confidential tax information under Regulations section 601.502(c)(3)(ii), to act as the estate's representative before the Internal Revenue Service, and to make written or oral presentations on behalf of the estate if return prepared by an attorney, accountant, or enrolled agent for the executor:

Name of representative (print or type)	State	Address (number, street, and room or suite no., city, state, and ZIP code)
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I declare that I am the attorney accountant enrolled agent (you must check the applicable box) for the executor and prepared this return 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
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1 Death certificate number and issuing authority (attach a copy of the death certificate to this return).
607 City of Alexandria, Virginia

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

3 Marital status of the decedent at time of death:

Married

Widow or widower—Name, SSN and date of death of deceased spouse Harold M. O'Connell 577-58-9813 died 6/20/86

Single

Legally separated

Divorced—Date divorce decree became final ▶

4a Surviving spouse's name	4b Social security number	4c Amount received (see instructions)
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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). For Privacy Act Notice (applicable to individual beneficiaries only), see the instructions for Form 1040.

Name of individual, trust, or estate receiving \$5,000 or more	Identifying number	Relationship to decedent	Amount (see instructions)
Jean M. Nader	225 50 9052	daughter	\$265,953
Sheila O'Connell-Shevenell	224 54 7273	daughter	\$265,953
Anthony M. O'Connell	225 52 7637	son	\$265,953

All unascertainable beneficiaries and those who receive less than \$5,000	▶	797,860
Total		797,860

(Continued on next page)

Part 4.—General Information (continued)

Please check the "Yes" or "No" box for each question.		Yes	No
6	Does the gross estate contain any section 2044 property (qualified terminable interest property (QTIP) from a prior gift or estate)(see instructions)?		X
7a	Have Federal gift tax returns ever been filed? If "Yes," please attach copies of the returns, if available, and furnish the following information:	X	
7b	Period(s) covered 1988, 89, 90, 91		
7c	Internal Revenue office(s) where filed Philadelphia		
If you answer "Yes" to any of questions 8-16, you must attach additional information as described in the instructions.			
8a	Was there any insurance on the decedent's life that is not included on the return as part of the gross estate?		X
b	Did the decedent own any insurance on the life of another that is not included in the gross estate?		X
9	Did the decedent at the time of death own any property as a joint tenant with right of survivorship in which (1) one or more of the other joint tenants was someone other than the decedent's spouse, and (2) 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
10	Did the decedent, at the time of death, own any interest in a partnership or unincorporated business or any stock in an inactive or closely held corporation?		X
11a	Did the decedent make any transfer described in section 2035, 2036, 2037, or 2038 (see the instructions for Schedule G)? If "Yes," you must complete and attach Schedule G		X
b	If "Yes," was it a valuation freeze subject to section 2036(c)?		
12	Were there in existence at the time of the decedent's death:		
a	Any trusts created by the decedent during his or her lifetime?		X
b	Any trusts not created by the decedent under which the decedent possessed any power, beneficial interest, or trusteeship?		X
13	Did the decedent ever possess, exercise, or release any general power of appointment? If "Yes," you must complete and attach Schedule H.		X
14	Was the marital deduction computed under the transitional rule of Public Law 97-34, section 403(e)(3) (Economic Recovery Tax Act of 1981)? If "Yes," attach a separate computation of the marital deduction, enter the amount on item 18 of the Recapitulation, and note on item 18 "computation attached."		X
15	Was the decedent, immediately before death, receiving an annuity described in the "General" paragraph of the instructions for Schedule I? If "Yes," you must complete and attach Schedule I.		X
16	Did the decedent have a total "excess retirement accumulation" (as defined in section 4980A(d)) in qualified employer plans and individual retirement plans? If "Yes," you must complete and attach Schedule S.		X

Part 5.—Recapitulation

Item number	Gross estate	Alternate value	Value at date of death	
1	Schedule A—Real Estate		161,701	80
2	Schedule B—Stocks and Bonds		278,061	24
3	Schedule C—Mortgages, Notes, and Cash		531,136	80
4	Schedule D—Insurance on the Decedent's Life (attach Form(s) 712)			
5	Schedule E—Jointly Owned Property (attach Form(s) 712 for life insurance)		40,796	81
6	Schedule F—Other Miscellaneous Property (attach Form(s) 712 for life insurance)		29,320	90
7	Schedule G—Transfers During Decedent's Life (attach Form(s) 712 for life insurance)			
8	Schedule H—Powers of Appointment			
9	Schedule I—Annuities			
10	Total gross estate (add items 1 through 9). Enter here and on line 1 of the Tax Computation.		1,041,017	55
Item number	Deductions	Amount		
11	Schedule J—Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims		52,043	39
12	Schedule K—Debts of the Decedent		56,760	13
13	Schedule K—Mortgages and Liens			
14	Total of items 11 through 13		108,803	52
15	Allowable amount of deductions from item 14 (see the instructions for item 15 of the Recapitulation)		108,803	52
16	Schedule L—Net Losses During Administration			
17	Schedule L—Expenses Incurred in Administering Property Not Subject to Claims			
18	Schedule M—Bequests, etc., to Surviving Spouse			
19	Schedule O—Charitable, Public, and Similar Gifts and Bequests			
20	Total allowable deductions (add items 15 through 19). Enter here and on line 2 of the Tax Computation.		108,803	52

Estate of: JEAN M. O'CONNELL

SCHEDULE A—Real Estate

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

(Real estate that is part of a sole proprietorship should be shown on Schedule F. Real estate that is included in the gross estate under section 2035, 2036, 2037, or 2038 should be shown on Schedule G. Real estate that is included in the gross estate under section 2041 should be shown on Schedule H.)

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

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
1	<p>53.9006% interest in 15 acres of undeveloped land in Fairfax County Virginia, Tax Map #90 4 1 17</p> <p>Appraisal attached. the appraisal refers to the value of the entire tract as \$300,000. Decedent owned a partial interest in the whole.</p>			161,701.80
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				
TOTAL (Also enter on Part 5, Recapitulation, page 3, at item 1.)				161,701.80

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

Instructions for Schedule A.— Real Estate

If the total gross estate contains any real estate, you must complete Schedule A and file it with the return.

On Schedule A list real estate the decedent owned or had contracted to purchase. Number each parcel in the left-hand column.

Describe the real estate in enough detail so that IRS can easily locate it for inspection and valuation. For each parcel of real estate, report the area and, if the parcel is improved, describe the improvements. For city or town property, report the street and number, ward, subdivision, block and lot, etc. For rural property, report the township, range, landmarks, etc.

If any item of real estate is subject to a mortgage for which the decedent's estate is liable, that is, if the indebtedness may be charged against other property of the estate that is not subject to that mortgage, or if the decedent was personally liable for that mortgage, you must report the full value of the property in the value column.

Enter the amount of the mortgage under "Description" on this schedule. The unpaid amount of the mortgage may be deducted on Schedule K. If the decedent's estate is NOT liable for the amount of the mortgage, report only the value of the equity of redemption (or value of the property less the indebtedness) in the value column as part of the gross estate. Do not enter any amount less than zero. Do not deduct the amount of indebtedness on Schedule K.

Also list on Schedule A real property the decedent contracted to purchase. Report the full value of the property and not the equity in the value column. Deduct the unpaid part of the purchase price on Schedule K.

Report the value of real estate without reducing it for homestead or other exemption, or the value of dower, curtesy, or a statutory estate created instead of dower or curtesy.

Explain how the reported values were determined and attach copies of any appraisals.

Schedule A Examples

In this example the alternate valuation is not adopted; the date of death is January 1, 1990.

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
1	House and lot, 1921 William Street NW, Washington, DC (lot 6, square 481). Rent of \$2,700 due at end of each quarter, February 1, May 1, August 1, and November 1. Value based on appraisal, copy of which is attached.			108,000
	Rent due on item 1 for quarter ending November 1, 1989, but not collected at date of death			2,700
	Rent accrued on item 1 for November and December 1989			1,800
2	House and lot, 304 Jefferson Street, Alexandria, VA (lot 18, square 40). Rent of \$300 payable monthly. Value based on appraisal, copy of which is attached			36,000
	Rent due on item 2 for December 1989, but not collected at date of death			300

In this example alternate valuation is adopted; the date of death is January 1, 1990.

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
1	House and lot, 1921 William Street NW, Washington, DC (lot 6, square 481). Rent of \$2,700 due at end of each quarter, February 1, May 1, August 1, and November 1. Value based on appraisal, copy of which is attached. Not disposed of within 6 months following death	7/1/90	90,000	108,000
	Rent due on item 1 for quarter ending November 1, 1989, but not collected until February 1, 1990	2/1/90	2,700	2,700
	Rent accrued on item 1 for November and December 1989, collected on February 1, 1990	2/1/90	1,800	1,800
2	House and lot, 304 Jefferson Street, Alexandria, VA (lot 18, square 40). Rent of \$300 payable monthly. Value based on appraisal, copy of which is attached. Property exchanged for farm on May 1, 1990	5/1/90	30,000	36,000
	Rent due on item 2 for December 1989, but not collected until February 1, 1990	2/1/90	300	300

Estate of:

SCHEDULE A-1—Section 2032A Valuation

Part 1.—Type of Election:

- Protective election (Regulations section 20.2032A-8(b)).—Complete Part 2, line 1, and column A of lines 3 and 4. (See instructions.)
- Regular election.—Complete all of Part 2 (including line 11, if applicable) and Part 3. (See instructions.)

Part 2.—Notice of Election (Regulations section 20.2032A-8(a)(3))

Note: All real property entered on lines 2 and 3 must also be entered on Schedules A, E, F, G, or H, as applicable.

- 1 Qualified use—check one
 - Farm used for farming, or
 - Trade or business other than farming
- 2 Real property used in a qualified use, passing to qualified heirs, and to be specially valued on this Form 706.

A Schedule and item number from Form 706	B Full value (without section 2032A(b)(3)(B) adjustment)	C Adjusted value (with section 2032A(b)(3)(B) adjustment)	D Value based on qualified use (without section 2032A(b)(3)(B) adjustment)
Totals			

Attach a legal description of all property listed on line 2.
 Attach copies of appraisals showing the column B values for all property listed on line 2.

- 3 Real property used in a qualified use, passing to qualified heirs, but not specially valued on this Form 706.

A Schedule and item number from Form 706	B Full value (without section 2032A(b)(3)(B) adjustment)	C Adjusted value (with section 2032A(b)(3)(B) adjustment)	D Value based on qualified use (without section 2032A(b)(3)(B) adjustment)
Totals			

If you checked "Regular election," you must attach copies of appraisals showing the column B values for all property listed on line 3.
 (Continued on next page)

4 Personal property used in a qualified use and passing to qualified heirs.

A Schedule and Item number from Form 706	B Adjusted value (with section 2032A(b)(3)(B) adjustment)	A (continued) Schedule and Item number from Form 706	B (continued) Adjusted value (with section 2032A(b)(3)(B) adjustment)
		"Subtotal" from Col. B, below left
Subtotal		Total adjusted value	

5 Enter the value of the total gross estate as adjusted under section 2032A(b)(3)(A). ▶ _____

6 Attach a description of the method used to determine the special value based on qualified use.

7 Did the decedent and/or a member of his or her family own all property listed on line 2 for at least 5 of the 8 years immediately preceding the date of the decedent's death? Yes No

8 Were there any periods during the 8-year period preceding the date of the decedent's death during which the decedent or a member of his or her family:

	Yes	No
a Did not own the property listed on line 2 above?		
b Did not use the property listed on line 2 above in a qualified use?		
c Did not materially participate in the operation of the farm or other business within the meaning of section 2032A(e)(6)?		

If "Yes" to any of the above, you must attach a statement listing the periods. If applicable, describe whether the exceptions of sections 2032A(b)(4) or (5) are met.

9 Attach affidavits describing the activities constituting material participation and the identity and relationship to the decedent of the material participants.

10 Persons holding interests. Enter the requested information for each party who received any interest in the specially valued property.

	Name	Address		
A				
B				
C				
D				
E				
F				
G				
H				
	Identifying number	Relationship to decedent	Fair market value	Special use value
A				
B				
C				
D				
E				
F				
G				
H				

You must attach a computation of the GST tax savings attributable to direct skips for each person listed above who is a skip person. (See Instructions.)

11 Woodlands election.—Check here if you wish to make a woodlands election as described in section 2032A(e)(13). Enter the Schedule and item numbers from Form 706 of the property for which you are making this election ▶ _____

You must attach a statement explaining why you are entitled to make this election. The IRS may issue regulations that require more information to substantiate this election. You will be notified by IRS if you must supply further information.

Part 3.—Agreement to Special Valuation Under Section 2032A

Estate of: _____	Date of Death _____	Decedent's Social Security Number _____
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We (list all qualified heirs and other persons having an interest in the property required to sign this agreement)

_____ ,
 _____ ,
 being all the qualified heirs and _____

_____ ,
 being all other parties having interests in the property which is qualified real property and which is valued under section 2032A of the Internal Revenue Code, do hereby approve of the election made by _____ ,
 Executor/Administrator of the estate of _____ ,
 pursuant to section 2032A to value said property on the basis of the qualified use to which the property is devoted and do hereby enter into this agreement pursuant to section 2032A(d).

The undersigned agree and consent to the application of subsection (c) of section 2032A of the Code with respect to all the property described on line 2 of Part 2 of Schedule A-1 of Form 706, attached to this agreement. More specifically, the undersigned heirs expressly agree and consent to personal liability under subsection (c) of 2032A for the additional estate and GST taxes imposed by that subsection with respect to their respective interests in the above-described property in the event of certain early dispositions of the property or early cessation of the qualified use of the property. It is understood that if a qualified heir disposes of any interest in qualified real property to any member of his or her family, such member may thereafter be treated as the qualified heir with respect to such interest upon filing a Form 706-A and a new agreement.

The undersigned interested parties who are not qualified heirs consent to the collection of any additional estate and GST taxes imposed under section 2032A(c) of the Code from the specially valued property.

If there is a disposition of any interest which passes or has passed to him or her or if there is a cessation of the qualified use of any specially valued property which passes or passed to him or her, each of the undersigned heirs agrees to file a Form 706-A, United States Additional Estate Tax Return, and pay any additional estate and GST taxes due within 6 months of the disposition or cessation.

It is understood by all interested parties that this agreement is a condition precedent to the election of special use valuation under section 2032A of the Code and must be executed by every interested party even though that person may not have received the estate (or GST) tax benefits or be in possession of such property.

Each of the undersigned understands that by making this election, a lien will be created and recorded pursuant to section 6324B of the Code on the property referred to in this agreement for the adjusted tax differences with respect to the estate as defined in section 2032A(c)(2)(C).

As the interested parties, the undersigned designate the following individual as their agent for all dealings with the Internal Revenue Service concerning the continued qualification of the specially valued property under section 2032A of the Code and on all issues regarding the special lien under section 6324B. The agent is authorized to act for the parties with respect to all dealings with the Service on matters affecting the qualified real property described earlier. This authority includes the following:

- To receive confidential information on all matters relating to continued qualification under section 2032A of the specially valued real property and on all matters relating to the special lien arising under section 6324B.
- To furnish the Service with any requested information concerning the property.
- To notify the Service of any disposition or cessation of qualified use of any part of the property.
- To receive, but not to endorse and collect, checks in payment of any refund of Internal Revenue taxes, penalties, or interest.
- To execute waivers (including offers of waivers) of restrictions on assessment or collection of deficiencies in tax and waivers of notice of disallowance of a claim for credit or refund.
- To execute closing agreements under section 7121.
- Other acts (specify) ► _____

By signing this agreement, the agent agrees to provide the Service with any requested information concerning this property and to notify the Service of any disposition or cessation of the qualified use of any part of this property.

_____ Name of Agent	_____ Signature	_____ Address
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The property to which this agreement relates is listed in Form 706, United States Estate (and Generation-Skipping Transfer) Tax Return, and in the Notice of Election, along with its fair market value according to section 2031 of the Code and its special use value according to section 2032A. The name, address, social security number, and interest (including the value) of each of the undersigned in this property are as set forth in the attached Notice of Election.

IN WITNESS WHEREOF, the undersigned have hereunto set their hands at _____ ,
 this _____ day of _____ .
 Qualified Heirs _____

Other Interested Parties _____

Instructions for Schedule A-1.—Section 2032A Valuation

The election to value certain farm and closely held business property at its special use value is made by checking "Yes" to line 2 of Part 3, Elections by the Executor. Schedule A-1 is used to report the additional information that must be submitted to support this election. In order to make a valid election, you must complete Schedule A-1 and attach all of the required statements and appraisals.

For definitions and additional information concerning special use valuation, see section 2032A and the related regulations.

Part 1.—Type of Election

Estate and GST Tax Elections.—If you elect special use valuation for the estate tax, you must also elect special use valuation for the GST tax and vice versa.

You must value each specific property interest at the same value for GST tax purposes that you value it at for estate tax purposes.

Protective Election.—To make the protective election described in the separate instructions for line 2 of Part 3, Elections by the Executor, you must check this box, enter the decedent's name and social security number in the spaces provided at the top of Schedule A-1, and complete line 1 and column A of lines 3 and 4 of Part 2. For purposes of the protective election, list on line 3 all of the real property that passes to the qualified heirs even though some of the property will be shown on line 2 when the additional notice of election is subsequently filed. You need not complete columns B–D of lines 3 and 4. You need not complete any other line entries on Schedule A-1. Completing Schedule A-1 as described above constitutes a Notice of Protective Election as described in Regulations section 20.2032A-8(b).

Part 2.—Notice of Election

Line 10.—Because the special use valuation election creates a potential tax liability for the recapture tax of section 2032A(c), you must list each person who receives an interest in the specially valued property on Schedule A-1. If there are more than 8 persons who receive interests, use an additional sheet that follows the format of line 10. In the columns "Fair market value" and "Special use value," you should enter the total respective values of all the specially valued property interests received by each person.

GST Tax Savings.—To compute the additional GST tax due upon disposition (or cessation of qualified use) of the property, each "skip person" (as defined in the instructions to Schedule R) who receives an interest in the specially valued property must know the total GST tax savings on all of the interests in specially valued property received. This GST tax savings is the difference between the total GST tax that was imposed on all of the interests in specially valued property received by the skip person valued at their special use value and the total GST tax that would have been imposed on the same interests received by the skip person had they been valued at their fair market value.

Because the GST tax depends on the executor's allocation of the GST exemption and the grandchild exclusion, the skip person who receives the interests is unable to compute this GST tax savings. Therefore, for each skip person who receives an interest in specially valued property, you must attach worksheets showing the total GST tax savings attributable to all of that person's interests in specially valued property.

How To Compute the GST Tax Savings.—Before computing each skip person's GST tax savings, you must complete Schedules R and R-1 for the entire estate (using the special use values).

For each skip person, you must complete two Schedules R (Parts 2 and 3 only) as worksheets, one showing the interests in specially valued property received by the skip person at their special use value and one showing the same interests at their fair market value.

If the skip person received interests in specially valued property that were shown on Schedule R-1, show these interests on the Schedule R, Parts 2 and 3 worksheets, as appropriate. Do not use Schedule R-1 as a worksheet.

Completing the Special Use Value Worksheets.—On lines 2–4 and 6, enter "-0-".

Completing the Fair Market Value Worksheets.—*Lines 2 and 3, fixed taxes and other charges.*—If valuing the interests at their fair market value (instead of special use value) causes any of these taxes and charges to increase, enter the increased amount (only) on these lines and attach an explanation of the increase. Otherwise, enter "-0-".

Line 6—GST exemption.—If you completed line 10 of Schedule R, Part 1, enter on line 6 the amount shown for the skip person on the *line 10 special use allocation schedule* you attached to Schedule R. If you did not complete line 10 of Schedule R, Part 1, enter "-0-" on line 6.

Total GST Tax Savings.—For each skip person, subtract the tax amount on line 10, Part 2 of the special use value worksheet from the tax amount on line 10, Part 2 of the fair market value worksheet. This difference is the skip person's total GST tax savings.

Part 3.—Agreement to Special Valuation Under Section 2032A

The agreement to special valuation by persons with an interest in property is required under section 2032A(a)(1)(B) and (d)(2) and must be signed by all parties who have any interest in the property being valued based on its qualified use as of the date of the decedent's death.

An interest in property is an interest that, as of the date of the decedent's death, can be asserted under applicable local law so as to affect the disposition of the specially valued property by the estate. Any person who at the decedent's death has any such interest in the property, whether present or future, or vested or contingent, must enter into the agreement. Included are owners of remainder and executory interests; the holders of general or special powers of appointment; beneficiaries of a gift over in default of exercise of any such power; joint tenants and holders of similar undivided interests when the decedent held only a joint or undivided interest in the property or when only an undivided interest is specially valued; and trustees of trusts and representatives of other entities holding title to, or holding any interests in the property. An heir who has the power under local law to caveat (challenge) a will and thereby affect disposition of the property is not, however, considered to be a person with an interest in property under section 2032A solely by reason of that right. Likewise, creditors of an estate are not such persons solely by reason of their status as creditors.

If any person required to enter into the agreement either desires that an agent act for him or her or cannot legally bind himself or herself due to infancy or other incompetency, or due to death before the election under section 2032A is timely exercised, a representative authorized by local law to bind the person in an agreement of this nature may sign the agreement on his or her behalf.

The Internal Revenue Service will contact the agent designated in the agreement on all matters relating to continued qualification under section 2032A of the specially valued real property and on all matters relating to the special lien arising under section 6324B. It is the duty of the agent as attorney-in-fact for the parties with interests in the specially valued property to furnish the IRS with any requested information and to notify the IRS of any disposition or cessation of qualified use of any part of the property.

Estate of: JEAN M. O'CONNELL

SCHEDULE B—Stocks and Bonds

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

Item number	Description including face amount of bonds or number of shares and par value where needed for identification. Give CUSIP number if available.	Unit value	Alternate valuation date	Alternate value	Value at date of death
1	200 sh Washington Gas Light Co common CUSIP 938837 10 1	31.875			6,375.00
2	66 sh Virginia Commonwealth Corp common (now Signet)	21 7/8			1,443.75
3	33 sh Virginia Commonwealth Bankshares common (now Signet)	21.875			721.875
4	99 sh Bank Of Virginia common (now Signet) CUSIP 065446	21.875			2,165.625
5	3861.447 sh Investment Company of America Fund 04	17.005			65,663.91
6	2961.152 sh Kemper Municipal Bond Fund	10.265			30,396.23
7	4556.413 sh Franklin Virginia Tax Free Income Fund	11.085			50,507.84
8	Fairfax County Virginia Industrial Dev Auth Rev bond, 8/15/02 6.4%				109,587.00
9	700 units Nuveen Premium Income Municipal Fund	16.00			11,200.00
		6,375.00 +			
		1,443.75 +			
		721.875 +			
		2,165.625 +			
		65,663.91 +			
		30,396.23 +			
		50,507.84 +			
		109,587.00 +			
		11,200.00 +			
		278,061.23			
		278,061.23			
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule					
TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 2.)					278,061.24

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
 (The instructions to Schedule B are in the separate instructions.)

Estate of: JEAN M. O'CONNELL

SCHEDULE C—Mortgages, Notes, and Cash

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

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
1				
1	ck Wash Gas Light Co. 8/1/91			
2	ck Signet 8/5/91			105.00
3	ck A. G. Edwards 8/15/91			39.60
4	ck Kemper Mun Bond Fund 4/30/91			2,346.63
5	ck Kemper Mun Bond Fund 5/31/91			162.86
6	ck Kemper Mun Bond Fund 7/31/91			162.86
7	ck Kemper Mun Bond Fund 8/30/91			162.86
8	Ck Nuveen Fund 3/1/91			162.86
9	Ck Nuveen Fund 5/1/91			63.00
10	ck Nuveen Fund 6/3/91			63.00
11	ck Nuveen Fund 8/1/91			63.00
12	ck Nuveen Fund 9/3/91			66.50
13	ck American Funds 9/9/91			66.50
14	Deed of Trust note, dated 4/21/88, made by Lynch Properties Limited Partnership, face amount \$625,940.86, secured by 6541 Franconia Rd., Springfield, Va., due on 4/21/95, interest @ 9% (value is not discounted) sum represents principal due at DOD (int as IRD in Sched F)			424.76
15	Travelers Check			500,752.69
16	USAA Subscriber savings acct			20.00
17	Ck Am Funds 5/10/91			25.10
18	Sovran Bank, Virginia #4536-2785, MMA			326.60
19	First Virginia Bank, #4076-1509, MMA			3,310.46
				22,812.52
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				
TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 3.)				531,136.80

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

Estate of: **JEAN M. O'CONNELL**

SCHEDULE D—Insurance on the Decedent's Life

You must attach a Form 712 for each policy.

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
1	NONE			
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				
TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 4.)				

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

Instructions for Schedule D.— Insurance on the Decedent's Life

If there was any insurance on the decedent's life, whether or not included in the gross estate, you must complete Schedule D and file it with the return.

Insurance you must include on Schedule D.—Under section 2042 you must include in the gross estate:

- Insurance on the decedent's life receivable by or for the benefit of the estate; and
- Insurance on the decedent's life receivable by beneficiaries other than the estate, as described below.

The term "insurance" refers to life insurance of every description, including death benefits paid by fraternal beneficiary societies operating under the lodge system, and death benefits paid under no-fault automobile insurance policies if the no-fault insurer was unconditionally bound to pay the benefit in the event of the insured's death.

Insurance in favor of the estate.—Include on Schedule D the full amount of the proceeds of insurance on the life of the decedent receivable by the executor or otherwise payable to or for the benefit of the estate. Insurance in favor of the estate includes insurance used to pay the estate tax, and any other taxes, debts, or charges which are enforceable against the estate. The manner in which the policy is drawn is immaterial as long as there is an obligation, legally binding on the beneficiary, to use the proceeds to pay taxes, debts, or charges. You must include the full amount even though the premiums or other consideration may have been paid by a person other than the decedent.

Insurance receivable by beneficiaries other than the estate.—Include on Schedule D the proceeds of all insurance on the life of the decedent not receivable by or for the benefit of the decedent's estate if the decedent possessed at death any of the incidents of ownership, exercisable either alone or in conjunction with any person.

Incidents of ownership in a policy include:

- The right of the insured or estate to its economic benefits;
- The power to change the beneficiary;

- The power to surrender or cancel the policy;
- The power to assign the policy or to revoke an assignment;
- The power to pledge the policy for a loan;
- The power to obtain from the insurer a loan against the surrender value of the policy;
- A reversionary interest if the value of the reversionary interest was more than 5% of the value of the policy immediately before the decedent died. (An interest in an insurance policy is considered a reversionary interest if, for example, the proceeds become payable to the insured's estate or payable as the insured directs if the beneficiary dies before the insured.)

Life insurance not includible in the gross estate under section 2042 may be includible under some other section of the Code. For example, a life insurance policy could be transferred by the decedent in such a way that it would be includible in the gross estate under section 2036, 2037, or 2038. (See the instructions to Schedule G for a description of these sections.)

Completing the Schedule

You must list **every policy** of insurance on the life of the decedent, whether or not it is included in the gross estate.

Under "Description" list:

- Name of the insurance company
- Number of the policy

For every policy of life insurance listed on the schedule, you must request a statement on Form 712, Life Insurance Statement, from the company which issued the policy. Attach the Form 712 to the back of Schedule D.

If the policy proceeds are paid in one sum, enter the net proceeds received (from Form 712, line 24) in the value (and alternate value) columns of Schedule D. If the policy proceeds are not paid in one sum, enter the value of the proceeds as of the date of the decedent's death (from Form 712, line 25).

If part or all of the policy proceeds are not included in the gross estate, you must explain why they were not included.

Estate of: **JEAN M. O'CONNELL**

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))

Item number	Description For securities, give CUSIP number, if available.	Alternate valuation date	Alternate value	Value at date of death
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				
1a	Totals		1a	
1b	Amounts included in gross estate (one-half of line 1a)		1b	

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 sheet.

Name	Address (number and street, city, state, and ZIP code)
A. Jean M. Nader	350 Fourth Ave.
B.	New Kensington, Pa. 15068
C.	

Item number	Enter letter for co-tenant	Description (including alternate valuation date if any) For securities, give CUSIP number, if available.	Percentage Includible	Includible alternate value	Includible value at date of death
1	A	Savings acct Hallmark Bank, Springfield Va. 31107849600 CD 66211061	100		40,796.81 11,208.22 <hr/> 52,005.03
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule					
2b	Total other joint interests		2b		40,796.81
3	Total includible joint interests (add lines 1b and 2b). Also enter on Part 5, Recapitulation, page 3, at item 5				40,796.81

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

Instructions for Schedule E.— Jointly Owned Property

You must complete Schedule E and file it with the return if the decedent owned any joint property at the time of death, whether or not the decedent's interest is includible in the gross estate.

Enter on this schedule all property of whatever kind or character, whether real estate, personal property, or bank accounts, in which the decedent held at the time of death an interest either as a joint tenant with right to survivorship or as a tenant by the entirety.

Do not list on this schedule property that the decedent held as a tenant in common, but report the value of the interest on Schedule A if real estate, or on the appropriate schedule if personal property. Similarly, community property held by the decedent and spouse should be reported on the appropriate Schedules A through I. The decedent's interest in a partnership should not be entered on this schedule unless the partnership interest itself is jointly owned. Solely owned partnership interests should be reported on Schedule F, "Other Miscellaneous Property."

Part 1.—Qualified joint interests held by decedent and spouse.—Under section 2040(b)(2), a joint interest is a qualified joint interest if the decedent and the surviving spouse held the interest as:

- Tenants by the entirety; or
- Joint tenants with right of survivorship if the decedent and the decedent's spouse are the *only* joint tenants.

Interests which meet either of the two requirements above should be entered in Part 1. Joint interests that do not meet either of the two requirements above should be entered in Part 2.

Under "Description," describe the property as required in the instructions for Schedules A, B, C, and F for the type of property involved. For example, jointly held stocks and bonds should be described using the rules given in the instructions to Schedule B.

Under "Alternate value" and "Value at date of death," enter the *full value* of the property.

Note: You can not claim the special treatment under section 2040(b) for property held jointly by a decedent and a surviving spouse who is not a U.S. citizen. You must report these joint interests on Part 2 of Schedule E, not Part 1.

Part 2.—Other joint interests.—All joint interests that were not entered in Part 1 must be entered in Part 2.

For each item of property, enter the appropriate letter A, B, C, etc., from line 2a to indicate the name and address of the surviving co-tenant.

Under "Description," describe the property as required in the instructions for Schedules A, B, C, and F for the type of property involved.

In the "Percentage includible" column, enter the percentage of the total value of the property that you intend to include in the gross estate.

Generally, you must include the full value of the jointly owned property in the gross estate. However, the full value should not be included if you can show that a part of the property originally belonged to the other tenant or tenants and was never received or acquired by the other tenant or tenants from the decedent for less than an adequate and full consideration in money or money's worth, or unless you can show that any part of the property was acquired with consideration originally belonging to the surviving joint tenant or tenants. In this case, you may exclude from the value of the property an amount proportionate to the consideration furnished by the other tenant or tenants. Relinquishing or promising to relinquish dower, curtesy, or statutory estate created instead of dower or curtesy, or other marital rights in the decedent's property or estate is not consideration in money or money's worth. See the Schedule A instructions for the value to show for real property that is subject to a mortgage.

If the property was acquired by the decedent and another person or persons by gift, bequest, devise, or inheritance as joint tenants, and their interests are not otherwise specified by law, include only that part of the value of the property that is figured by dividing the full value of the property by the number of joint tenants.

If you believe that less than the full value of the entire property is includible in the gross estate for tax purposes, you must establish the right to include the smaller value by attaching proof of the extent, origin, and nature of the decedent's interest and the interest(s) of the decedent's co-tenant or co-tenants.

In the "Includible alternate value" and "Includible value at date of death" columns, you should enter only the values that you believe are includible in the gross estate.

Estate of: **JEAN M. O'CONNELL**

SCHEDULE F—Other Miscellaneous Property Not Reportable Under Any Other Schedule

(For jointly owned property that must be disclosed on Schedule E, see the Instructions for Schedule E.)
 (If you elect section 2032A valuation, you must complete Schedule F and Schedule A-1.)

	Yes	No
1 Did the decedent at the time of death own any articles of artistic or collectible value in excess of \$3,000 or any collections whose artistic or collectible value combined at date of death exceeded \$10,000? If "Yes," full details must be submitted on this schedule.		X
2 Has the decedent's estate, spouse, or any other person, received (or will receive) any bonus or award as a result of the decedent's employment or death? If "Yes," full details must be submitted on this schedule.		X
3 Did the decedent at the time of death have, or have access to, a safe deposit box? If "Yes," state location, and if held in joint names of decedent and another, state name and relationship of joint depositor.	X	

If any of the contents of the safe deposit box are omitted from the schedules in this return, explain fully why omitted.

Item number	Description For securities, give CUSIP number, if available.	Alternate valuation date	Alternate value	Value at date of death
1	1988 Plymouth Van			8,000.00
	INCOME WITH RESPECT TO DECEDENT			
2	Interest owed on Lynch Properties Note described in Schedule C			18,150.57
3	Virginia 1990 tax refund			1,605.58
4	Blue Cross payment due			88.78
4	Interest due Harold O'Connell Trust			816.00
5	Debt due from Harold O'Connell Trust			659.97
	(TOTAL IRD 21,320.90)			
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				29,320.90
TOTAL (Also enter on Part 5, Recapitulation, page 3, at Item 6.)				29,320.90

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

Instructions for Schedule F.— Other Miscellaneous Property

You must complete Schedule F and file it with the return.

On Schedule F list all items that must be included in the gross estate that are not reported on any other schedule, including:

- Debts due the decedent (other than notes and mortgages included on Schedule C)
- Interests in business
- Insurance on the life of another (obtain and attach Form 712, Life Insurance Statement, for each policy)
Note for single premium or paid-up policies: *In certain situations, for example where the surrender value of the policy exceeds its replacement cost, the true economic value of the policy will be greater than the amount shown on line 56 of Form 712. In these situations you should report the full economic value of the policy on Schedule F. See Rev. Rul. 78-137, 1978-1 C.B. 280 for details.*
- Section 2044 property
- Claims (including the value of the decedent's interest in a claim for refund of income taxes or the amount of the refund actually received)
- Rights
- Royalties
- Leaseholds
- Judgments
- Reversionary or remainder interests
- Shares in trust funds (attach a copy of the trust instrument)

- Household goods and personal effects, including wearing apparel
- Farm products and growing crops
- Livestock
- Farm machinery
- Automobiles

If the decedent owned any interest in a partnership or unincorporated business, attach a statement of assets and liabilities for the valuation date and for the 5 years before the valuation date. Also attach statements of the net earnings for the same 5 years. You must account for goodwill in the valuation. In general, furnish the same information and follow the methods used to value close corporations. See the instructions for Schedule B.

All partnership interests should be reported on Schedule F unless the partnership interest, itself, is jointly owned. Jointly owned partnership interests should be reported on Schedule E.

If real estate is owned by the sole proprietorship, it should be reported on Schedule F and not on Schedule A. Describe the real estate with the same detail required for Schedule A.

Line 1.—If the decedent owned at the date of death articles with artistic or intrinsic value (for example, jewelry, furs, silverware, books, statuary, vases, oriental rugs, coin or stamp collections), check the "Yes" box on line 1 and provide full details. If any one article is valued at more than \$3,000, or any collection of similar articles is valued at more than \$10,000, attach an appraisal by an expert under oath and the required statement regarding the appraiser's qualifications (see Regulations section 20.2031-6(b)).

Estate of: **JEAN M. O'CONNELL**

SCHEDULE G—Transfers During Decedent's Life

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

Item number	Description For securities, give CUSIP number, if available.	Alternate valuation date	Alternate value	Value at date of death
A.	Gift tax paid 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(c))	X X X X X		
B.	Transfers includible under section 2035(a), 2036, 2037, or 2038:			
1	NONE			
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				
TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 7.)				

SCHEDULE H—Powers of Appointment

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

Item number	Description	Alternate valuation date	Alternate value	Value at date of death
1	NONE			
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				
TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 8.)				

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
 (The instructions to Schedules G and H are in the separate instructions.)

Estate of: **JEAN M. O'CONNELL**

SCHEDULE I—Annuities

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

A Are you excluding from the decedent's gross estate the value of a lump-sum distribution described in section 2039(f)(2)?
 If "Yes," you must attach the information required by the instructions.

Yes	No

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	NONE			
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				
TOTAL (Also enter on Part 5, Recapitulation, page 3, at item 9.)				

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
 (The instructions to Schedule I are in the separate instructions.)

Estate of: **JEAN M. O'CONNELL**

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

Note: Do not list on this schedule expenses of administering property not subject to claims. For those expenses, see the instructions for Schedule L. 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 if a waiver is filed to waive the deduction on Form 706 (see the Form 1041 instructions).

Item number	Description	Expense amount	Total Amount
A. Funeral expenses:			
1	Demaine Funeral Home		5,206.54
2	Sheila O'Connell Shevenell for cemetary bill		475.00
3	C. Shaw funeral flowers		102.00
4	Rev. Andrews funeral service		100.00
	Total funeral expenses		5,883.54
B. Administration expenses:			
1	Executors' commissions—amount estimated/agreed upon/paid. (Strike out the words that do not apply.)		43,513.70
2	Attorney fees—amount estimated/agreed upon/paid. (Strike out the words that do not apply.)		
3	Accountant fees—amount estimated/agreed upon/paid. (Strike out the words that do not apply.)		
4	Miscellaneous expenses:	Expense amount	
	Fairfax Co. Va. Circuit Ct. letters	14.00	
	Probate tax	1,269.00	
	Checks	15.89	
	Inventory fee	61.00	
	Bond for lost certificate Nuveen Account	169.26	
	Processing fee lost Nuveen Certificate	20.00	
	Accounting fee to Commissioner of Accts	1,097.00	
	Total miscellaneous expenses from continuation schedule(s) (or additional sheet(s)) attached to this schedule	2,446 x 15	2,646.15
	Total miscellaneous expenses		5,243 x 39
TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 11.)			52,043.39

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

Instructions for Schedule J.— Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims

General.— You must complete and file Schedule J if you claim a deduction on Item 11 of Part 5, Recapitulation.

On Schedule J itemize funeral expenses and expenses incurred in administering property subject to claims. List the names and addresses of persons to whom the expenses are payable and describe the nature of the expense. **Do not list expenses incurred in administering property not subject to claims on this schedule. List them on Schedule L instead.**

Funeral Expenses.—Itemize funeral expenses on line A. Deduct from the expenses any amounts that were reimbursed, such as death benefits payable by the Social Security Administration and the Veterans Administration.

Executors' Commissions.—When you file the return, you may deduct commissions which have actually been paid to you or which you expect will be paid. You may not deduct commissions if none will be collected. If the amount of the commissions has not been fixed by decree of the proper court, the deduction will be allowed on the final examination of the return, provided that:

- The District Director is reasonably satisfied that the commissions claimed will be paid;
- The amount entered as a deduction is within the amount allowable by the laws of the jurisdiction where the estate is being administered;
- It is in accordance with the usually accepted practice in that jurisdiction for estates of similar size and character.

If you have not been paid the commissions claimed at the time of the final examination of the return, you must support the amount you deducted with an affidavit or statement signed under the penalties of perjury that the amount has been agreed upon and will be paid.

You may not deduct a bequest or devise made to you instead of commissions. If, however, the decedent fixed by will the compensation payable to you for services to be rendered in the administration of the estate, you may deduct this amount to the extent it is not more than the compensation allowable by the local law or practice.

Do not deduct on this schedule amounts paid as trustees' commissions whether received by you acting in the capacity of a trustee or by a separate trustee. If such amounts were paid in administering property not subject to claims, deduct them on Schedule L.

Note: *Executors' commissions are taxable income to the executors. Therefore, be sure to include them as income on your individual income tax return.*

Attorney Fees.—Enter the amount of attorney fees that have actually been paid or which you reasonably expect to be paid. If on the final examination of the return the fees claimed have not been awarded by the proper court and paid, the deduction will be allowed provided the District Director is reasonably satisfied that the amount claimed will be paid and that it does not exceed a reasonable payment for the services performed, taking into account the size and character of the estate and the local law and practice. If the fees claimed have not been paid at the time of final examination of the return, the amount deducted must be supported by an affidavit, or statement signed under the penalties of perjury, by the executor or the attorney stating that the amount has been agreed upon and will be paid.

Do not deduct attorney fees incidental to litigation incurred by the beneficiaries. These expenses are charged against the beneficiaries personally and are not administration expenses authorized by the Code.

Estate of **JEAN M. O'CONNELL**

SCHEDULE K—Debts of the Decedent, and Mortgages and Liens

Item number	Debts of the Decedent—Creditor and nature of claim, and allowable death taxes	Amount unpaid to date	Amount in contest	Amount claimed as a deduction
1	Colonial Emergency Physicians			10.40
2	Fairfax Co., Va. 1991 pers prop tax			428.44
3	VISA bill of decedent			643.44
4	Woodward & Lothrop debt			77.92
5	Goodwin House debt (rent)			1,363.64
6	Newspaper subscription debt			16.10
7	Car insurance debt			340.35
8	Choice ambulance service			185.00
9	Goodwin House health care bill			95.87
10	Sovran Bank car loan payoff			1,364.97
11	IRS 1991 income tax			15,332.00
12	Virginia 1991 income tax			2,856.00
13	IRS 1991 amended return	50,234		28,334.00
14	Virginia 1991 amended return			5,712.00

Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule

~~85,758.13~~

TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 12.)

56,760.13

Item number	Mortgages and Liens—Description	Amount
1	NONE	

Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule

TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 13.)

56,760.13

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

(The instructions to Schedule K are in the separate instructions.)

Estate of: JEAN M. O'CONNELL

SCHEDULE L—Net Losses During Administration and Expenses Incurred in Administering Property Not Subject to Claims

Item number	Net losses during administration <i>(Note: Do not deduct losses claimed on a Federal income tax return.)</i>	Amount
1	NONE	

Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule

TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 16.)

Item number	Expenses incurred in administering property not subject to claims <i>(Indicate whether estimated, agreed upon, or paid.)</i>	Amount
1		

Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule

TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 17.)

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

(The instructions to Schedule L are in the separate instructions.)

Estate of: JEAN M. O'CONNELL

SCHEDULE M—Bequests, etc., to Surviving Spouse

Terminable Interest (QTIP) Marital Deduction.—If you elect to claim a marital deduction for qualified terminable interest property (QTIP) under section 2056(b)(7), you MUST list on Part 2 of Schedule M all of the property for which you are making the election. Listing property on Part 2 constitutes the making of the QTIP election. No marital deduction will be allowed for any terminable interest property that is listed on Part 1 of Schedule M.

	Yes	No
1 Did any property pass to the surviving spouse as a result of a qualified disclaimer? <i>If "Yes," attach a copy of the written disclaimer required by section 2518(b).</i>		X
2 Is the surviving spouse a U.S. citizen?		
3 Qualified Domestic Trust. —Do you elect under section 2056A(d) to treat any trusts reported on Schedule M as qualified domestic trusts? (see instructions)		
4 Election out of QTIP Treatment of Annuities. —Do you elect under section 2056(b)(7)(C)(ii) to not 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)		

Part 1.—Property Interests Which Are Not Subject to a QTIP Election

(Note: A marital deduction will NOT be allowed for any terminable interest property (QTIP) that is listed on Part 1 of Schedule M.)

Item number	Description of property interests passing to surviving spouse	Value
1	NONE	
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule		
Total value of property interests not subject to a QTIP election (enter here and on line 1 of Part 3 on the next page)		

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

(The instructions to Schedule M are in the separate instructions.)

Part 2.—Property Interests Which Are Subject to a QTIP Election

(Note: Listing terminable interest property on Part 2 of Schedule M constitutes the making of a QTIP election for that property under section 2056(b)(7). A marital deduction will not be allowed for any terminable interest property that is not listed on Part 2. If you use a continuation page for Part 2, be sure that it is clearly labeled as Schedule M, Part 2.)

Item number	Description of property interests passing to surviving spouse (Describe portion of trust for which allocation is made.)	Value
1		
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule		

A. Total value of property interests subject to a QTIP election **A**

Part 3.—Reconciliation

1	Enter the total from part 1	1
2	Total interests passing to surviving spouse (add lines A and 1, above)	2
3a	Federal estate taxes (including section 4980A taxes) payable out of property interests listed on Parts 1 and 2	3a
b	Other death taxes payable out of property interests listed on Parts 1 and 2	3b
c	Federal and state GST taxes payable out of property interests listed on Parts 1 and 2	3c
d	Add items a, b, and c	3d
4	Net value of property interests listed on Schedule M (subtract 3d from 2). Also enter on Part 5, Recapitulation, page 3, at Item 18	4

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

Estate of: **JEAN M. O'CONNELL**

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

	Yes	No
1a If the transfer was made by will, has any action been instituted to have interpreted or to contest the will or 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 the 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	NONE		

Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule.

3 Total		3
4a Federal estate tax (including section 4980A taxes) payable out of property interests listed above	4a	
b Other death taxes payable out of property interests listed above	4b	
c Federal and state GST taxes payable out of property interests listed above	4c	
d Add items a, b, and c		4d
5 Net value of property interests listed above (subtract 4d from 3). Also enter on Part 5, Recapitulation, page 3, at item 19		5

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
(The instructions to Schedule O are in the separate instructions.)

Estate of: JEAN M. O'CONNELL

SCHEDULE P—Credit for Foreign Death Taxes

List all foreign countries to which death taxes have been paid and for which a credit is claimed on this return.

If a credit is claimed for death taxes paid to more than one foreign country, compute the credit for taxes paid to one country on this sheet and attach a separate copy of Schedule P for each of the other countries.

The credit computed on this sheet is for the _____
(Name of death tax or taxes)

imposed in _____
(Name of country)

Credit is computed under the _____
(Insert title of treaty or "statute")

Citizenship (nationality) of decedent at time of death

(All amounts and values must be entered in United States money)

1	Total of estate, inheritance, legacy, and succession taxes imposed in the country named above attributable to property situated in that country, subjected to these taxes, and included in the gross estate (as defined by statute)	
2	Value of the gross estate (adjusted, if necessary, according to the instructions for item 2)	
3	Value of property situated in that country, subjected to death taxes imposed in that country, and included in the gross estate (adjusted, if necessary, according to the instructions for item 3)	
4	Tax imposed by section 2001 reduced by the total credits claimed under sections 2010, 2011, and 2012 (see instructions)	
5	Amount of Federal estate tax attributable to property specified at item 3. (Divide item 3 by item 2 and multiply the result by item 4.)	
6	Credit for death taxes imposed in the country named above (the smaller of item 1 or item 5). Also enter on line 18 of Part 2, Tax Computation	

SCHEDULE Q—Credit for Tax on Prior Transfers

Part 1.—Transferor Information

	Name of transferor	Social security number	IRS office where estate tax return was filed	Date of death
A				
B				
C				

Check here if section 2013(f) (special valuation of farm, etc., real property) adjustments to the computation of the credit were made (see instructions).

Part 2.—Computation of Credit (see instructions)

Item	Transferor			Total A, B, & C
	A	B	C	
1	Transferee's tax as apportioned (from worksheet, (line 7 + line 8) x line 35 for each column)			
2	Transferor's tax (from each column of worksheet, line 20)			
3	Maximum amount before percentage requirement (for each column, enter amount from line 1 or 2, whichever is smaller)			
4	Percentage allowed (each column) (see instructions)	%	%	
5	Credit allowable (line 3 x line 4 for each column)			
6	TOTAL credit allowable (add columns A, B, and C of line 5). Enter here and on line 19 of Part 2, Tax Computation			

Schedule R.—Generation-Skipping Transfer Tax

Note: To avoid application of the deemed allocation rules, Form 706 and Schedule R should be filed to allocate the GST exemption to trusts which may later have taxable terminations or distributions under section 2612 even if the form is not required to be filed to report estate or GST tax.

Part 1.— GST Exemption Reconciliation (Section 2631) and Section 2652(a)(3) (Special QTIP) Election

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

1 Maximum allowable GST exemption	1	\$1,000,000
2 Total GST exemption allocated by the decedent against decedent's lifetime transfers	2	
3 Total GST exemption allocated by the executor, using Form 709, against decedent's lifetime transfers	3	
4 GST exemption allocated on line 6 of Schedule R, Part 2	4	
5 GST exemption allocated on line 6 of Schedule R, Part 3	5	
6 Total GST exemption allocated on line 4 of Schedule(s) R-1	6	
7 Total GST exemption allocated to <i>intervivos</i> transfers and direct skips (add lines 2-6)	7	
8 GST exemption available to allocate to trusts and section 2032A interests (subtract line 7 from line 1)	8	
9 Allocation of GST exemption to trusts (as defined for GST tax purposes):		

A Name of trust	B Trust's EIN (if any)	C GST exemption allocated on lines 2-6, above (see instructions)	D Additional GST exemption allocated (see instructions)	E Trust's inclusion ratio (optional—see instructions)

9D Total. May not exceed line 8, above	9D	
10 GST exemption available to allocate to section 2032A interests received by individual beneficiaries (subtract line 9D from line 8). You must attach special use allocation schedule (see instructions)	10	

(The instructions to Schedule R are in the separate instructions.)

Estate of: **JEAN M. O'CONNELL**

Part 2.—Direct Skips Where the Property Interests Transferred Bear the GST Tax on the Direct Skips

Name of skip person	Description of property interest transferred	Estate tax value
NONE		

1 Total estate tax values of all property interests listed above	1	
2 Estate taxes, state death taxes, and other charges borne by the property interests listed above	2	
3 GST taxes borne by the property interests listed above but imposed on direct skips other than those shown on this Part 2. (See instructions.)	3	
4 Total fixed taxes and other charges. (Add lines 2 and 3.)	4	
5 Total tentative maximum direct skips. (Subtract line 4 from line 1.)	5	
6 GST exemption allocated	6	
7 Subtract line 6 from line 5	7	
8 GST tax due (divide line 7 by 2.818182)	8	
9 Enter the amount from line 8 of Schedule R, Part 3	9	
10 Total GST taxes payable by the estate. (Add lines 8 and 9.) Enter here and on line 22 of the Tax Computation on page 1	10	

Estate of:

Part 3.—Direct Skips Where the Property Interests Transferred Do Not Bear the GST Tax on the Direct Skips

Name of skip person	Description of property interest transferred	Estate tax value

1 Total estate tax values of all property interests listed above	1
2 Estate taxes, state death taxes, and other charges borne by the property interests listed above	2
3 GST taxes borne by the property interests listed above but imposed on direct skips other than those shown on this Part 3. (See instructions.)	3
4 Total fixed taxes and other charges. (Add lines 2 and 3.)	4
5 Total tentative maximum direct skips. (Subtract line 4 from line 1.)	5
6 GST exemption allocated	6
7 Subtract line 6 from line 5	7
8 GST tax due (multiply line 7 by .55). Enter here and on Schedule R, Part 2, line 9	8

Estate of: **JEAN M. O'CONNELL**

SCHEDULE S—Increased Estate Tax on Excess Retirement Accumulations

(Under section 4980A(d) of the Internal Revenue Code)

Part I Tax Computation

- 1 Check this box if a section 4980A(d)(5) spousal election is being made
You must attach the statement described in the instructions.
- 2 Enter the name and employer identification number (EIN) of each qualified employer plan and individual retirement account in which the decedent had an interest at the time of death:

	Name	EIN
Plan #1		
Plan #2		
Plan #3		
IRA #1		
IRA #2		
IRA #3		

	A Plan #1	B Plan #2	C Plan #3	D All IRAs
3 Value of decedent's interest				
4 Amounts rolled over after death				
5 Total value (add lines 3 and 4)				
6 Amounts payable to certain alternate payees (see instructions)				
7 Decedent's investment in the contract under section 72(f)				
8 Excess life insurance amount				
9 Decedent's interest as a beneficiary				
10 Total reductions in value (add lines 6, 7, 8, and 9)				
11 Net value of decedent's interest (subtract line 10 from line 5)				
12 Decedent's aggregate interest in all plans and IRAs (add columns A–D of line 11)				12
13 Present value of hypothetical life annuity (from Part III, line 4)		13		
14 Remaining unused grandfather amount (from Part II, line 4)		14		
15 Enter the greater of line 13 or line 14				15
16 Excess retirement accumulation (subtract line 15 from line 12)				16
17 Increased estate tax (multiply line 16 by 15%). Enter here and on line 23 of the Tax Computation on page 1.				17

(The instructions to Schedule S are in the separate instructions.)

Part II Grandfather Election

1 Was a grandfather election made on a previously filed Form 5329? ▶ Yes No
 If "Yes," complete lines 2-4 below. You may not make or revoke the grandfather election after the due date (with extensions) for filing the decedent's 1988 income tax return. If "No," enter "-0-" on line 4 and skip to Part III.

2 Initial grandfather amount	2	
3 Total amount previously recovered	3	
4 Remaining unused grandfather amount (subtract line 3 from line 2). Enter here and on Part I, line 14, on page 33	4	

Part III Computation of Hypothetical Life Annuity

1 Decedent's attained age at date of death (in whole years, rounded down)	1	
2 Applicable annual annuity amount (see instructions)	2	
3 Present value multiplier (see instructions)	3	
4 Present value of hypothetical life annuity (multiply line 2 by line 3). Enter here and on Part I, line 13, on page 33.	4	

Estate Tax Amendment

1

ESTATE OF JEAN M. O'CONNELL

ADDENDUM TO AMENDED RETURN

The amendment to this return is due to the discovery of a jointly owned certificate of deposit, held by the decedent and Jean M. Nader.

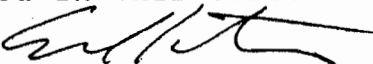
The amended return shows this as Item 2 on Part 2 of Schedule E. The estate's check in the amount of \$3629.09 for the additional tax is enclosed.

The certificate was held by Perpetual Savings Bank of the District of Columbia and Northern Virginia. That institution was declared insolvent and was taken over by the RTC. The accounts of Perpetual were transferred to Crestar Bank on January 10, 1972. Enclosed is a copy of a letter from Crestar Bank outlining the discovery of this account and its subsequent payment to the Co-holder, Jean M. Nader in the late Spring of 1993.

On March 16, 1992, within the nine months period for filing the 706 return, the undersigned went to Crestar to check if there were any outstanding accounts in the name of the decedent. At that time Crestar could find no such accounts, but stated that the Perpetual accounts received by Crestar were in very poor condition, and that much confusion existed concerning Perpetual's paperwork.

The decedent died on September 15, 1991. Crestar sent the payoff check to the decedent on January 24, 1992 apparently to the wrong address, as she had moved into a nursing home prior to her death.

In view of the fact that efforts had been made to ascertain the existence of all assets of the estate, and the fact that the Co-Executors had no knowledge of this account, it is requested that penalties and interest be waived in this case.


Edward J. White
Co-Executor



Department of the Treasury
Internal Revenue Service
PHILADELPHIA, PA 19255

Date of this notice: SEP. 13, 1993
Taxpayer Identifying Number: 230-50-6044
Form: 706 Tax Period:



JEAN M OCONNELL ESTATE
EDWARD J WHITE
118 S ROYAL ST
ALEXANDRIA VA 22314-3328183

For assistance you may call us at:

649-2361 LOCAL RICHMOND
1-800-829-1040 OTHER VA

Or you may write to us at the address shown at the left. If you write, be sure to attach the bottom part of this notice.

28506-263-00506-2

STATEMENT OF ADJUSTMENT TO YOUR ACCOUNT		
OVERPAYMENT ON ACCOUNT BEFORE ADJUSTMENT		\$3,629.09
TAX-INCREASE	ADJUSTMENT COMPUTATION	\$3,629.60
- INTEREST CHARGED ON AMENDED RETURN		283.88
NET ADJUSTMENT CHARGE	JN.	3,913.48
BALANCE DUE		\$284.39

Burke & Herbert Bank & Trust Co. Alexandria, Va.		No. 115
PAY TO THE ORDER OF <u>IRS</u>		<u>Set 13 1993</u> 68-108/560
		\$ <u>284.39</u>
<u>Two Hundred Eight Four & 39/100</u>		DOLLARS
FOR <u>Amended 706 Interest</u>		ESTATE OF JEAN M. O'CONNELL EDWARD J. WHITE & JEAN M. NADER, CO-EXECUTORS
<u>SSN 230-50-6044</u>		<u>Jean M. Nader</u>
⑈00000115⑈ ⑆056001066⑆ ⑆0190376⑈4⑈		

\$283.88 INTEREST - SEE ENCLOSED NOTICE, CODE 09
PAYMENTS - SEE ENCLOSED NOTICE, CODE 16
ADDITIONAL INTEREST CHARGES - SEE ENCLOSED NOTICE, CODE 19
MISCELLANEOUS - SEE ENCLOSED NOTICE, CODE 25

To make sure that IRS employees give courteous responses and correct information to taxpayers, a second IRS employee sometimes listens in on telephone calls.
Keep this part for your records

Overlay 6 Form 8488 (Rev. 11-87)

Return this part to us with your check or inquiry

Your telephone number
()

Best time to call

AMOUNT YOU OWE.....\$284.39

TAX-INCREASE

ADJUSTMENT COMPUTATION

\$3,629.60

INTEREST CHARGED ON AMENDED RETURN
NET ADJUSTMENT CHARGE 283.88

3,913.48

BALANCE DUE

\$284.39

Duke & Herbert Bank & Trust Co.
Alexandria, Va.

No. 115

Set 13 1983

68-108/580

PAY TO THE ORDER OF

IRS

\$ 284.39

DOLLARS

FOR

Two Hundred Eight Four & 39/100

Amended 706 Interest

SSN 230-50-6044

ESTATE OF JEAN M. O'CONNELL
EDWARD J. WHITE &
JEAN M. NADER, CO-EXECUTORS

Handwritten signature: Jean M. Nader

⑈00000115⑈ ⑆056001066⑆ ⑈01⑈90376⑈4⑈

\$283.88 INTEREST - SEE ENCLOSED NOTICE, CODE 09
PAYMENTS - SEE ENCLOSED NOTICE, CODE 16
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Your telephone number
() -

Best time to call

AMOUNT YOU OWE.....\$284.39

LESS PAYMENTS NOT INCLUDED.\$ _____

PAY ADJUSTED AMOUNT.....\$ _____

230506044 WC OCON 52 0 0000 670 00000028439



INTERNAL REVENUE SERVICE
PHILADELPHIA, PA 19255

JEAN M OCONNELL ESTATE
EDWARD J WHITE
118 S ROYAL ST
ALEXANDRIA VA 22314-3328183

226



Department of the Treasury
Internal Revenue Service
PHILADELPHIA, PA 19255

Date of this notice: SEP. 13, 1993
Taxpayer Identifying Number: 230-50-6044
Form: 706 Tax Period:



JEAN M OCONNELL ESTATE
EDWARD J WHITE
118 S ROYAL ST
ALEXANDRIA VA 22314-3328183

For assistance you may call us at:

649-2361 LOCAL RICHMOND
1-800-829-1640 OTHER VA

Or you may write to us at the address shown at the left. If you write, be sure to attach the bottom part of this notice.

28506-263-00506-2

STATEMENT OF ADJUSTMENT TO YOUR ACCOUNT

OVERPAYMENT ON ACCOUNT BEFORE ADJUSTMENT \$3,629.09

TAX-INCREASE ADJUSTMENT COMPUTATION \$3,629.60

INTEREST CHARGED on AMENDED RETURN 283.88
NET ADJUSTMENT CHARGE 3,913.48

BALANCE DUE \$284.39

Duke & Herbert Bank & Trust Co.
Alexandria, Va.

No. 115

SEP 13 1993

68-106/580

PAY TO THE ORDER OF

IRS

\$ 284.39

Two Hundred Eight Four & 39/100

DOLLARS

FOR

Amended 706 Return
SSN 230-50-6044

ESTATE OF JEAN M. O'CONNELL
EDWARD J. WHITE &
JEAN M. NADER, CO-EXECUTORS

John M. Nader

⑈00000115⑈ ⑆056001066⑆ ⑈011190376⑈

\$283.88 INTEREST - SEE ENCLOSED NOTICE, CODE 09
PAYMENTS - SEE ENCLOSED NOTICE, CODE 16
ADDITIONAL INTEREST CHARGES - SEE ENCLOSED NOTICE, CODE 19
MISCELLANEOUS - SEE ENCLOSED NOTICE, CODE 25

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Keep this part for your records

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Return this part to us with your check or inquiry

Your telephone number
() -

Best time to call

AMOUNT YOU OWE.....\$284.39

Return this part to us with your check or inquiry

Your telephone number
() -

Best time to call

AMOUNT YOU OWE.....\$284.39

LESS PAYMENTS NOT INCLUDED.\$

PAY ADJUSTED AMOUNT.....\$

230506044 WC OCON 52 0 0000 670 00000028439



INTERNAL REVENUE SERVICE
PHILADELPHIA, PA 19255

JEAN M OCONNELL ESTATE
EDWARD J WHITE
118 S ROYAL ST
ALEXANDRIA VA 22314-3328183

Estate Tax Amendment 2

Form 706 (Rev. August 1993)

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

OMB No. 1545-0015 Expires 12-31-95

Department of the Treasury Internal Revenue Service

Estate of a citizen or resident of the United States (see separate instructions). To be filed for decedents dying after October 8, 1990. For Paperwork Reduction Act Notice, see page 1 of the instructions.

Part 1 - Decedent and Executor. 1a Decedent's first name and middle initial (and maiden name, if any) JEAN M. 1b Decedent's last name O'CONNELL 2 Decedent's social security no. 230 150 6004 3a Domicile at time of death (county and state, or foreign country) FAIRFAX COUNTY, VA 3b Year domicile established pre 1960 4 Date of birth 2/1/12 5 Date of death 9/15/91 6a Name of executor (see instructions) EDWARD J. WHITE, Co-Executor 6b Executor's address (number and street including apartment or suite no. or rural route; city, town, or post office; state; and ZIP code) 118 SOUTH ROYAL ST. ALEXANDRIA, VA 22314 7a Name and location of court where will was probated or estate administered Fairfax County, Va. Circuit Court 7b Case number 49160 8 If decedent died testate, check here [X] and attach a certified copy of the will. 9 If Form 4768 is attached, check here [] 10 If Schedule R-1 is attached, check here []

Part 2 - Tax Computation. Table with 28 rows and 3 columns. Row 1: Total gross estate (from Part 5, Recapitulation, page 3, Item 10) 1,053,884 60. Row 2: Total allowable deductions (from Part 5, Recapitulation, page 3, item 20) 108,803 52. Row 3: Taxable estate (subtract line 2 from line 1) 945,081 08. Row 4: Adjusted taxable gifts (total taxable gifts (within the meaning of section 2503) made by the decedent after December 31, 1976, other than gifts that are includible in decedent's gross estate (section 2001(b))) 42,600. Row 5: Add lines 3 and 4 947,681 08. Row 6: Tentative tax on the amount on line 5 from Table A in the instructions. 340,995 62. Row 7a: If line 5 exceeds \$10,000,000, enter the lesser of line 5 or \$21,040,000. If line 5 is \$10,000,000 or less, skip lines 7a and 7b and enter -0- on line 7c. 7a: [] 7b: [] 7c: 840,995 62. Row 8: Total tentative tax (add lines 6 and 7c) 340,995 62. Row 9: Total gift tax payable with respect to gifts made by the decedent after December 31, 1976. Include gift taxes by the decedent's spouse for such spouse's share of split gifts (section 2513) only if the decedent was the donor of these gifts and they are includible in the decedent's gross estate (see instructions) 8,824 00. Row 10: Gross estate tax (subtract line 9 from line 8) 332,171 62. Row 11: Maximum unified credit against estate tax 11: 192,800 00. Row 12: Adjustment to unified credit. (This adjustment may not exceed \$6,000. See page 6 of the instructions.) 12: [] Row 13: Allowable unified credit (subtract line 12 from line 11) 13: 192,800. Row 14: Subtract line 13 from line 10 (but do not enter less than zero) 14: 139,371 62. Row 15: Credit for state death taxes. Do not enter more than line 14. Compute the credit by using the amount on line 3 less \$60,000. See Table B in the instructions and attach credit evidence (see instructions) 15: 30,124 54. Row 16: Subtract line 15 from line 14 16: 109,247 08. Row 17: Credit for Federal gift taxes on pre-1977 gifts (section 2012) (attach computation) 17: [] Row 18: Credit for foreign death taxes (from Schedule(s) P). (Attach Form(s) 706CE) 18: [] Row 19: Credit for tax on prior transfers (from Schedule Q). 19: [] Row 20: Total (add lines 17, 18, and 19) 20: [] Row 21: Net estate tax (subtract line 20 from line 16) 21: 109,247 08. Row 22: Generation-skipping transfer taxes (from Schedule R, Part 2, line 10) 22: [] Row 23: Section 4980A increased estate tax (from Schedule S, Part I, line 17) (see instructions) 23: [] Row 24: Total transfer taxes (add lines 21, 22, and 23) 24: 109,247 08. Row 25: Prior payments. Explain in an attached statement 25: 108,579.08. Row 26: United States Treasury bonds redeemed in payment of estate tax 26: [] Row 27: Total (add lines 25 and 26) 27: 108,579 08. Row 28: Balance due (or overpayment) (subtract line 27 from line 24) 28: 668 00.

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.

Signature(s) of executor(s) [Signature] Date 4-10-95

Signature of preparer other than executor Address (and ZIP code) Date

Part 4.—General Information (continued)

Please check the "Yes" or "No" box for each question.		Yes	No
6 Does the gross estate contain any section 2044 property (qualified terminable interest property (QTIP) from a prior gift or estate) (see page 5 of the instructions)?			X
7a Have Federal gift tax returns ever been filed? If "Yes," please attach copies of the returns, if available, and furnish the following information:		X	
7b Period(s) covered	7c Internal Revenue office(s) where filed		
If you answer "Yes" to any of questions 8–16, you must attach additional information as described in the instructions.			
8a Was there any insurance on the decedent's life that is not included on the return as part of the gross estate?			X
b Did the decedent own any insurance on the life of another that is not included in the gross estate?			X
9 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
10 Did the decedent, at the time of death, own any interest in a partnership or unincorporated business or any stock in an inactive or closely held corporation?			X
11 Did the decedent make any transfer described in section 2035, 2036, 2037, or 2038 (see the instructions for Schedule G)? If "Yes," you must complete and attach Schedule G.			X
12 Were there in existence at the time of the decedent's death:			
a Any trusts created by the decedent during his or her lifetime?			X
b Any trusts not created by the decedent under which the decedent possessed any power, beneficial interest, or trusteeship?			X
13 Did the decedent ever possess, exercise, or release any general power of appointment? If "Yes," you must complete and attach Schedule H.			X
14 Was the marital deduction computed under the transitional rule of Public Law 97-34, section 403(e)(3) (Economic Recovery Tax Act of 1981)? If "Yes," attach a separate computation of the marital deduction, enter the amount on item 18 of the Recapitulation, and note on item 18 "computation attached."			X
15 Was the decedent, immediately before death, receiving an annuity described in the "General" paragraph of the instructions for Schedule I? If "Yes," you must complete and attach Schedule I.			X
16 Did the decedent have a total "excess retirement accumulation" (as defined in section 4980A(d)) in qualified employer plans and individual retirement plans? If "Yes," you must complete and attach Schedule S.			X

Part 5.—Recapitulation

Item number	Gross estate	Alternate value	Value at date of death	
1	Schedule A—Real Estate		161,701	80
2	Schedule B—Stocks and Bonds		278,061	24
3	Schedule C—Mortgages, Notes, and Cash		531,136	80
4	Schedule D—Insurance on the Decedent's Life (attach Form(s) 712)			
5	Schedule E—Jointly Owned Property (attach Form(s) 712 for life insurance)		51,663	86
6	Schedule F—Other Miscellaneous Property (attach Form(s) 712 for life insurance)	AMENDED ITEM	39,320	90
7	Schedule G—Transfers During Decedent's Life (attach Form(s) 712 for life insurance)			
8	Schedule H—Powers of Appointment			
9	Schedule I—Annuities			
10	Total gross estate (add items 1 through 9). Enter here and on line 1 of the Tax Computation		1,053,884	60
Item number	Deductions	Amount		
11	Schedule J—Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims		52,043	39
12	Schedule K—Debts of the Decedent		56,760	13
13	Schedule K—Mortgages and Liens			
14	Total of items 11 through 13		108,803	52
15	Allowable amount of deductions from item 14 (see the instructions for item 15 of the Recapitulation)		108,803	52
16	Schedule L—Net Losses During Administration			
17	Schedule L—Expenses Incurred in Administering Property Not Subject to Claims			
18	Schedule M—Bequests, etc., to Surviving Spouse			
19	Schedule O—Charitable, Public, and Similar Gifts and Bequests			
20	Total allowable deductions (add items 15 through 19). Enter here and on line 2 of the Tax Computation		108,803	52

State of: JEAN M. O'CONNELL

SCHEDULE F—Other Miscellaneous Property Not Reportable Under Any Other Schedule

(For jointly owned property that must be disclosed on Schedule E, see the Instructions for Schedule E.)
 (If you elect section 2032A valuation, you must complete Schedule F and Schedule A-1.)

	Yes	No
1 Did the decedent at the time of death own any articles of artistic or collectible value in excess of \$3,000 or any collections whose artistic or collectible value combined at date of death exceeded \$10,000? If "Yes," full details must be submitted on this schedule.		X
2 Has the decedent's estate, spouse, or any other person, received (or will receive) any bonus or award as a result of the decedent's employment or death? If "Yes," full details must be submitted on this schedule.		X
3 Did the decedent at the time of death have, or have access to, a safe deposit box? If "Yes," state location, and if held in joint names of decedent and another, state name and relationship of joint depositor.	X	

If any of the contents of the safe deposit box are omitted from the schedules in this return, explain fully why omitted.

Item number	Description For securities, give CUSIP number, if available	Alternate valuation date	Alternate value	Value at date of death
1	1988 Plymouth Van			8,000.00
	INCOME WITH RESPECT TO DECEDENT			
2	Interest owed on Lynch Properties Note described in Schedule C			18,150.57
3	Virginia 1990 tax refund			1,605.58
4	Blue Cross payment due			88.78
4	Interest due Harold O'Connell Trust			816.00
5	Debt due from Harold O'Connell Trust			659.97
	(TOTAL IRD 21,320.90)			
6	TWO CEMETARY LOTS FAIRFAX MEMORIAL PARK FAIRFAX VIRGINIA <u>AMENDED ITEM</u>			2,000.00
Total from continuation schedule(s) (or additional sheet(s)) attached to this schedule				200,000.00
TOTAL (Also enter on Part 5, Recapitulation, page 3, at item 6.)				31,320.90

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

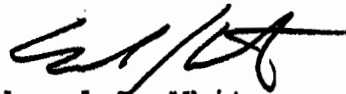
ESTATE OF JEAN M. O'CONNELL

ADDENDUM TO AMENDED RETURN

The amendment to this return is due to the discovery of the presence of two cemetary lots owned by the decedent, which were unknown to the Co-Executors.

The amended return shows this as Item 6 of Schedule F. The estate's check in the amount of \$668.00 for the additional tax is enclosed.

In view of the fact that efforts had been made to ascertain the existence of all assets of the estate, and the fact that the Co-Executors had no knowledge of these lots, it is requested that penalties and interest be waived in this case.



Edward J. White
Co-Executor

Virginia

Estate Tax Extension Virginia

EDWARD J. WHITE
ATTORNEY AT LAW
118 SOUTH ROYAL STREET
ALEXANDRIA, VIRGINIA 22314

TELEPHONE 836-5444

June 11, 1992

Virginia Department of Taxation
Estate Tax Section
P.O. Box 768
Richmond, Va. 23206

Re: Estate of Jean M. O'Connell
SSN 230 50 6044
Filing Extension Request

Gentlemen:

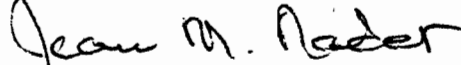
Enclosed is a copy of IRS Form 4768 with attachment and the Estate's check in the amount of \$31,000.00.

An extension of the filing date is requested.

Sincerely,



Edward J. White



Jean M. Nader

Co-Executors

EJW/e
Encl.

Bank & Trust Co. & Trust Co.
Alexandria, Va.

No. 18

68-108/580

June 11 1992

PAY TO THE ORDER OF Va. Dept. of Taxation

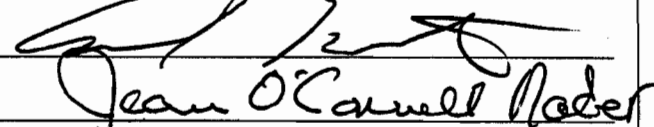
\$ 31,000.00

Thirty One Thousand & 00/100

DOLLARS

FOR Est. Tax
SSN 230-50-6044

ESTATE OF Jean M. O'Connell



Jean O'Connell Nader

⑆056001066⑆ 01⑆90376⑆4⑆ Co-Executors

Estate Tax Return Virginia

FORM EST-80

Check Appropriate Box(es)

- Resident Return
- Nonresident Return
- Alien Return
- Amended Return
- Extension Granted

VIRGINIA

Estate Tax Return

This form used only for
estates of decedents who
died after December 31,
1979.

(Space for use of Department of Taxation)

DATE RECEIVED

Decedent's Name JEAN M. O'CONNELL Date of Death Sept. 15, 1991
FIRST NAME MIDDLE INITIAL LAST NAME

Domicile at Date of Death Fairfax County Social Security Number 230 50 6044

Name and Address of Personal Representative Edward J. White and Jean M. Nader
c/o 118 South Royal St., Alexandria, Va. 22314

(Number and Street or Rural Route, City, Town or Post Office, State and Zip Code)

Name and Address of Attorney _____

(Number and Street or Rural Route, City, Town or Post Office, State and Zip Code)

A COPY OF THE FEDERAL ESTATE TAX RETURN MUST BE FILED WITH THIS RETURN

1. Virginia Estate Tax	(State death tax credit from Federal Form 706. If the federal gross estate consists of real estate or tangible property located outside Virginia or if the decedent was a nonresident, enter tax from appropriate line on Page 2 of this form.)	29,403.99
2. Penalty If Applicable	NOTE: extension filed and \$31,000.00 paid with extension. Refund of \$1596.01 due.	
3. Interest If Applicable		
4. Total Tax, Penalty and Interest		29,403.99

The Virginia Estate tax is due and payable by the Personal Representative at the time the Virginia Estate Tax Return is required to be filed. If the tax is not paid on time, a penalty in the amount of 5% of the tax is due. Also, interest is due on the tax and penalty at the rate established by Section 58.1-15.

Checks should be made payable to the Virginia Department of Taxation and mailed with the Virginia Estate Tax Return to the following address:

VIRGINIA DEPARTMENT OF TAXATION
 PROCESSING SERVICES DIVISION
 P.O. BOX 6-L
 RICHMOND, VIRGINIA 23282

Under penalty of law, I declare that I have examined this return, and to the best of my knowledge and belief, it is a true, correct, and complete return.

Edward J. White, P. Nader 9/21/92

Signature of Personal Representative _____ Date _____ Telephone No. _____

Signature of preparer if other than Personal Representative, etc. Jean M. Nader Date 9-8-92 Address and Zip Code _____ Telephone No. _____

Estate Tax Amendment

1

Estate Tax Amendment 2

(Space for use of Department of Taxation)

FORM EST-80

VIRGINIA Estate Tax Return

This form used only for
estates of decedents who
died after December 31,
1979.

DATE RECEIVED

Check Appropriate Box(es)

- Resident Return
- Nonresident Return
- Allen Return
- Amended Return
- Extension Granted

Decedent's Name JEAN M. O'CONNELL Date of Death 9/15/91
FIRST NAME MIDDLE INITIAL LAST NAME

Domicile at Date of Death FAIRFAX COUNTY Social Security Number 230 50 6044

Name and Address of Personal Representative EDWARD J. WHITE AND JEAN M. NADER
c/o 118 SOUTH ROYAL ST., ALEXANDRIA, VA 22314

(Number and Street or Rural Route, City, Town or Post Office, State and Zip Code)

Name and Address of Attorney _____

(Number and Street or Rural Route, City, Town or Post Office, State and Zip Code)

A COPY OF THE FEDERAL ESTATE TAX RETURN MUST BE FILED WITH THIS RETURN

1. Virginia Estate Tax	(State death tax credit from Federal Form 706. If the federal gross estate consists of real estate or tangible property located outside Virginia or if the decedent was a nonresident, enter tax from appropriate line on Page 2 of this form.)	<u>30,124.54</u>
2. Penalty If Applicable	NOTE: \$29,403.99 paid with extension request and refund. \$608.55 paid with first amendment. \$112.00 is the additional tax owed and submitted herewith	<u> </u>
3. Interest If Applicable		<u> </u>
4. Total Tax, Penalty and Interest		<u>30,124.54</u>

The Virginia Estate tax is due and payable by the Personal Representative at the time the Virginia Estate Tax Return is required to be filed. If the tax is not paid on time, a penalty in the amount of 5% of the tax is due. Also, interest is due on the tax and penalty at the rate established by Section 58.1-15.

Checks should be made payable to the Virginia Department of Taxation and mailed with the Virginia Estate Tax Return to the following address:

VIRGINIA DEPARTMENT OF TAXATION
 PROCESSING SERVICES DIVISION
 P.O. BOX 6-L
 RICHMOND, VIRGINIA 23282

Under penalty of law, I declare that I have examined this return, and to the best of my knowledge and belief, it is a true, correct, and complete return.

Edward J. White - G. Nader 4/19/95 Jean M. Nader 4-10-95
Signature of Personal Representative Date Telephone No.

Signature of preparer if other than Personal Representative, etc. Address and Zip Code Telephone No.