Form **709**

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

(For gifts made during calendar year 2006)

OMB No. 1545-0020

2006

Department of the Treasury

See senarate instructions

IIIICI	nan i	tevenue	e del vice	P dec separate instructions.							
			r's first name and middle initial	2 Donor's last name	3 Donor's s	social secui	rity number				
	FRANKLIN Z. ADELL - Hypothetical				999 99 9999						
							icile) (county and s	tate)			
						Michigan	1				
	6	City	state, and ZIP code		7 Citizenshi						
	ľ	Oity,	state, and Zii code	Ollizerisiii	Ρ						
E C							1				
Ĕ	8	lf '	the donor died during the year, check here	3-2006	,	Yes	No				
Ë	9		you extended the time to file this Form 709								
5	10) Er	nter the total number of donees listed on Sc								
<u>l</u>	11	a Ha	ave you (the donor) previously filed a Form 709	11b		V					
=	11		the answer to line 11a is "Yes," has your addre								
5	12 Gifts by husband or wife to third parties. Do you consent to have the gifts (including generation-skipping transfers) made										
ž	12 Gifts by husband or wife to third parties. Do you consent to have the gifts (including generation-skipping transfers) made										
Ğ	8 If the donor died during the year, check here 9 If you extended the time to file this Form 709, check here 10 Enter the total number of donees listed on Schedule A. Count each person only once. 11a Have you (the donor) previously filed a Form 709 (or 709-A) for any other year? If "No," skip line 11b. 11b If the answer to line 11a is "Yes," has your address changed since you last filed Form 709 (or 709-A)? 12 Gifts by husband or wife to third parties. Do you consent to have the gifts (including generation-skipping transfer by you and by your spouse to third parties during the calendar year considered as made one-half by each of you instructions.) (If the answer is "Yes," the following information must be furnished and your spouse must sign the shown below. If the answer is "No," skip lines 13–18 and go to Schedule A)										
				ving information must be furnished and your							
				es 13–18 and go to Schedule A.)							
Part	13 Name of consenting spouse 14 SSN										
┻│	15	15 Were you married to one another during the entire calendar year? (see instructions)									
	16 If 15 is "No," check whether ☐ married ☐ divorced or ☐ widowed/deceased, and give date (see instructions) ▶										
	17	' W	ill a gift tax return for this year be filed by y	our spouse? (If "Yes," mail both returns in the	e same enve	elope.) .					
	18 Consent of Spouse. I consent to have the gifts (and generation-skipping transfers) made by me and by my spouse to third parties during the calendar year										
		CO	ensidered as made one-half by each of us. We are	both aware of the joint and several liability for tax	created by the	e execution	of this consent.				
	Cc	nsent	ing spouse's signature ▶			Date ▶					
\exists				Proceedings		1	6,655,018	00			
		1	•	line 11		2	818,567	45			
		2	Enter the amount from Schedule B, line 3			_					
		3	Total taxable gifts. Add lines 1 and 2 .	3	7,473,585	45					
		4	Tax computed on amount on line 3 (see Ta	4	3,298,649	31					
		5	Tax computed on amount on line 2 (see Ta	5	275,041	31					
		6	Balance. Subtract line 5 from line 4	6	3,023,608	00					
		7	Maximum unified credit (nonresident aliens	7	345,800	00					
	احا	8	,	•		8	211,300	00			
	<u>ō</u>	9	· ·	er the unified credit against tax allowable for all prior periods (from Sch. B, line 1, col. C) ance. Subtract line 8 from line 7							
	tat			9	134,500	00					
	omputation	10	, , , , , , , , , , , , , , , , , , , ,								
	Ē		1976, and before January 1, 1977 (see inst	10	124 500	00					
	2	11	Balance. Subtract line 10 from line 9 .	11	134,500	00					
	S	12	Unified credit. Enter the smaller of line 6 or	line 11		12	134,500	00			
	<u>T</u> ax	13	Credit for foreign gift taxes (see instruction	s)		13	0				
	ш										
	4	14	Total credits. Add lines 12 and 13			14	134,500	00			
	Part	15		ot enter less than zero		15	2,889,108	00			
'	ď	16	Generation-skipping transfer taxes (from Se			16	0				
oj.		10	Generation-skipping transfer taxes (norm Si	chedule o, Fart 3, col. 11, Total)		1.0					
ē						17	2,889,108	00			
7		17					2,003,100	- 00			
g		18	Gift and generation-skipping transfer taxes	prepaid with extension of time to file $\ \ .$		18	U				
þ											
e		19	If line 18 is less than line 17, enter balance	e due (see instructions)		19	2,889,108	00			
9											
or money order here.		20	If line 18 is greater than line 17, enter amo		20	0					
				ave examined this return, including any accompanying							
쑹			knowledge and belief, it is true, correct, and any knowledge.	or) is based of	n all intorma	ition of which prepa	arer has				
Pe		ign	any momoage.								
2	Н	Here									
Attach check			Signature of donor		 Date	Nate					
ij	\vdash		, ,		Date		T				
4	Pa	iid	Preparer's signature		Check if						
		epare	er's				self-employed				
		Use Only Firm's name (or yours if self-employed),									
			to the control of th		I Di						

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SCHE	DULE A Computation of Taxable Gi	fts (Inc	luding transfer	s in trus	st) (see instru	ctions)	
	s the value of any item listed on Schedule A reflect a			· ·			Yes No No
В	◆ Check here if you elect under section 529(c)(2)(B) to over a 5-year period beginning this year. See instruct Output Description: Des	o treat a ions. Att	iny transfers made ach explanation.	this year	to a qualified tu	ition program as	made ratably
Part 1-	-Gifts Subject Only to Gift Tax. Gifts less politica	ıl organi	zation, medical, a	and educa	ational exclusion	ns. See instruct	ions.
A Item number	B • Donee's name and address • Relationship to donor (if any) • Description of gift • If the gift was of securities, give CUSIP no. • If closely held entity, give EIN	С	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter ½ of column F	H Net transfer (subtract col. G from col. F)
1	Son			2006	6,667,018	0	6,667,018
Gifts ma	ade by spouse—complete only if you are splitting	gifts wit	h your spouse ar	nd he/she	also made gifts	S	
Total o	f Part 1. Add amounts from Part 1, column H .					•	
Part 2-	-Direct Skips. Gifts that are direct skips and are sunological order.						ust list the gifts
A Item number	B Donee's name and address Relationship to donor (if any) Description of gift If the gift was of securities, give CUSIP no. If closely held entity, give EIN	C 2632(b) election out	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter ½ of column F	H Net transfer (subtract col. G from col. F)
1							
Gifts ma	ade by spouse—complete only if you are splitting	gifts wit	h your spouse ar	id he/she	also made gifts	S.	
Total o	f Part 2. Add amounts from Part 2, column H .					🕨	0
	-Indirect Skips. Gifts to trusts that are currently sut these gifts in chronological order.	bject to	gift tax and may	later be s	ubject to genera	ation-skipping tr	ansfer tax. You
A Item number	B • Donee's name and address • Relationship to donor (if any) • Description of gift • If the gift was of securities, give CUSIP no. • If closely held entity, give EIN	C 2632(c) election	D Donor's adjusted basis of gift	E Date of gift	F Value at date of gift	G For split gifts, enter ½ of column F	H Net transfer (subtract col. G from col. F)
1							
J:#-		-::	<u></u>	-1.11.1	-1 1 '6'		
its mi	ade by spouse—complete only if you are splitting	gιπs wit 	n your spouse ar	ia ne/she 	aiso made gifts	S.	

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

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Part 4—Taxable Giff	t Reconciliation				
1 Total value of gi	fts of donor. Add totals from column H of Parts 1, 2	, and 3	1	6,667,018	00
2 Total annual exc	clusions for gifts listed on line 1 (see instructions) .		2	12,000	
3 Total included a	mount of gifts. Subtract line 2 from line 1		3	6,655,018	00
Deductions (see instru	uctions)				
4 Gifts of interests	to spouse for which a marital deduction will be claim	ed, based			
on item numbers	s of Schedule	1 1			
5 Exclusions attrib	outable to gifts on line 4				
6 Marital deductio	n. Subtract line 5 from line 4				
7 Charitable deduce	ction, based on item nos less exclu	usions . 7			
8 Total deductions	s. Add lines 6 and 7			0	
9 Subtract line 8 f			9	6,655,018	00
	ping transfer taxes payable with this Form 709 (from add lines 9 and 10. Enter here and on page 1, Part 2			6,655,018	00
	QTIP) Marital Deduction. (See instructions for Sche		<u> </u>	0,000,010	00
a. The trust (or other b. The value of the shall be deemed to ha 2523(f). If less than the entire on line 4, the donor straction is equal to the of the trust (or other properties). See institute in the content of the trust (or other properties). See institute in the content of the trust (or other properties). See institute in the content of the trust (or other properties). See institute in the content of t	perty) meets the requirements of qualified terminable or property) is listed on Schedule A, and trust (or other property) is entered in whole or in parawe made an election to have such trust (or other property) walue of the trust (or other property) that the donor hall be considered to have made an election only as a amount of the trust (or other property) deducted or property) listed in Parts 1 and 3 of Schedule A. election, the terminable interest property involved we structions for line 4 of Schedule A. If your spouse did be considered to have made a transfer of the entire of Spouse on page 4 of the instructions. TIP Treatment of Annuities For and would otherwise be treated as qualified term of Schedule A for the annuities for which you are made at the considered to the second	rt as a deduction on Scoperty) treated as qualificated in Parts 1 to a fraction of the true in Schedule A, Part 4, limited by the included in your seposes (by gift or other exproperty that is subject field terminable interest innable interest property aking this election	hedule A, Part 4, line ied terminable interes and 3 of Schedule A ist (or other property). The 6. The denominator pouse's gross estate wise) of all or part of the to the gift tax. See in property any joint and or under section 2523(f	4, then the donor to property under sections and deduction of the numerator of this respectively. The numerator of the respective of the total upon his or her deat the qualifying life incorransfer of Certain List survivor annuities the contraction of the contr	ction s I value h h oome fe nat are
1 Totals for prior p	periods	211,300	0	818,567	45

Amount, if any, by which total specific exemption, line 1, column D, is more than \$30,000

Total amount of taxable gifts for prior periods. Add amount on line 1, column E and amount, if any, on line 2. Enter here and on page 1, Part 2—Tax Computation, line 2

818,567

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SCHEDULE C **Computation of Generation-Skipping Transfer Tax**

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

	naimed) on ochedo								
Part 1—Gen	eration-Skipping 1	ransfers							
A B Item No. (from Schedule A, Part 2, col. A) A B Value (from Sched Part 2, col. H			e A,				D at Transfer (subtract col. C from col. B)		
1									
Gifts made	by spouse (for gift s	plitting only)		1					
Part 2—GST	Exemption Recor	nciliation (Sect	ion 2631) an	d Section 2652(:	a)(3) Flection				
Check here ▶	_								
	numbers from Sch	_		cial QTIP) election					
	mallowable exempt	•					1		
ı ıvıaxımu	m allowable exempl	ion (see instruct	ioris)				<u> </u>		
2 Total ex	emption used for pe	vriade bafara filir	na this roturn				2		
2 Total ex	emption used for pe	silous belore IIIII	ig tills return				_		
3 Exempt	on available for this	return Subtract	line 2 from lir	ne 1			3		
o Exempt	on available for this	return. Gubtraci	inio 2 non in						
4 Exempt	ion claimed on this r	eturn from Part	3. column C t	total, below			4		
			o, oo.a o .						
5 Automa	tic allocation of exer	nption to transfe	ers reported o	n Schedule A, Par	t 3 (see instructions)	5		
-	(see instructions)								
7 Add line	es 4, 5, and 6						7		
	ion available for futu	ire transfers. Su	btract line 7 fi	rom line 3			8		
	Computation			_			1		
A Item No.	B Net transfer	C CCT Evernation	D Divide cel C	E Inclusion Ratio	F Maximum Fatata	G Applicable Rate	G	H eneration-Skipping	
(from Schedule C, Part 1)	(from Schedule C, Part 1, col. D)	GST Exemption Allocated	Divide col. C by col. B	(subtract col. D from 1.000)	Maximum Estate Tax Rate	(multiply col. E by col. F)		Transfer Tax tiply col. B by col. G)	
. ,	rait i, coi. b)			110111 1.000)	400/ (40)	by col. 1)	(mai	upiy coi. B by coi. a)	
1					46% (.46) 46% (.46)				
					46% (.46)				
					46% (.46)				
					46% (.46)				
					46% (.46)				
Gifts made	by spouse (for gift s	plitting only)				·			
	, , ,				46% (.46)				
					46% (.46)				
					46% (.46)				
					46% (.46)				
					46% (.46)				
					46% (.46)				
Total exemption	on claimed. Enter								
here and on	Part 2, line 4,		Total gener	ration-skipping tr	ansfer tax. Enter he	ere; on page 3,			
	ot exceed Part 2,		Schedule A, Part 4, line 10; and on page 1, Part 2—Tax						
line 3, above			Computation, line 16						