

note-IRS5p

The Lynch note is reported to the IRS as if it had not been paid off in full on April 21, 1992, but still scheduled to mature on April 21, 1995. The documentation here is from the Second Amendment to the Estate Tax Return of April 10, 1995.

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

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
2	INCOME WITH RESPECT TO DECEDENT 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.)

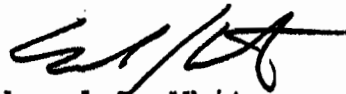
ESTATE OF JEAN M. O'CONNELL

ADDENDUM TO AMENDED RETURN

The amendment to this return is due to the discovery of the presence of two cemetery 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