

Summary of Contents

CAPSULE SUMMARY	V
APPROACH TO EXAMS	XLIII
Chapter One. Introduction	1
Chapter Approach	2
A. The Estate Tax	2
B. The Gift Tax	4
C. Coordination of the Federal Estate and Gift Taxes	4
D. The Generation-Skipping Transfer Tax	5
E. Taxing Jurisdiction	6
F. Portability of the Deceased Spousal Exclusion Amount (“Portability”)	7
G. The Tax Cuts and Jobs Act	7
Chapter Two. Substantive Aspects of the Estate Tax	9
Chapter Approach	10
A. Gross Estate	10
B. Deductions	111
Chapter Three. Substantive Aspects of the Gift Tax	135
Chapter Approach	136
A. Taxable Gifts	136
B. Exclusions	149
C. Deductions	154
Chapter Four. Miscellaneous Gift Tax Rules	161
Chapter Approach	162
A. Powers of Appointment	162
B. Disclaimers	164
C. Gift Splitting	166
Chapter Five. Valuation	169
Chapter Approach	170
A. Introductory Comments	170
B. Rules of Law Relating to Valuation	170
C. Valuation Methods	185
D. Valuation of Some Specific Items	187
Chapter Six. Computation of Tax	191
Chapter Approach	192
A. Gift Tax Computations	192
B. Estate Tax Computations	197
C. Deceased Spousal Unused Exclusion Amount (“Portability”)	203
Chapter Seven. Tax on Generation-Skipping Transfers	205
Chapter Approach	206
A. Background and Introduction	206
B. Transfers to Which the Tax Applies	208
C. Amount Taxable	211
D. Computation of Tax	212
E. Payment of Tax	213

Chapter Eight. Returns and Payment of Tax.....	215
Chapter Approach	216
A. Gift Tax	216
B. Estate Tax	218
REVIEW QUESTIONS AND ANSWERS	223
Review Questions	224
Answers to Review Questions	233
EXAM QUESTIONS AND ANSWERS	243
TABLE OF CASES.....	251
TABLE OF INTERNAL REVENUE CODE SECTIONS.....	253
INDEX	257