

Estate of: Michael Kim	Decedent's social security number 123 45 6789
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SCHEDULE O—Charitable, Public, and Similar Gifts and Bequests

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

	Yes	No
1a If the transfer was made by will, has any action been instituted to contest or have interpreted any of its provisions affecting the charitable deductions claimed in this schedule? If "Yes," full details must be submitted with this schedule.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b According to the information and belief of the person or persons filing this return, is any such action planned? If "Yes," full details must be submitted with this schedule.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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).	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Item number	Name and address of beneficiary	Character of institution	Amount
1	None		0
Total from continuation schedules (or additional statements) attached to this schedule			0

3 Total			3
4a Federal estate tax 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 4a, 4b, and 4c			4d
5 Net value of property interests listed above (subtract item 4d from item 3). Also enter on Part 5—Recapitulation, page 3, at item 22			5

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

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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 U.S. 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)	1	
2 Value of the gross estate (adjusted, if necessary, according to the instructions)	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)	3	
4 Tax imposed by section 2001 reduced by the total credits claimed under sections 2010 and 2012 (see instructions)	4	
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.)	5	
6 Credit for death taxes imposed in the country named above (the smaller of item 1 or item 5). Also enter on line 13 of Part 2—Tax Computation	6	

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, and C
	A	B	C	
1 Transferee's tax as apportioned (from worksheet, (line 7 ÷ line 8) × 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 line 2, whichever is smaller)				
4 Percentage allowed (each column) (see instructions)	%	%	%	
5 Credit allowable (line 3 × line 4 for each column)				
6 TOTAL credit allowable (add columns A, B, and C of line 5). Enter here and on line 14 of Part 2—Tax Computation				

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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 that 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.

The GST tax is imposed on taxable transfers of interests in property located outside the United States as well as property located inside the United States. See instructions.

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

You no longer need to check a box to make a section 2652(a)(3) (special QTIP) election. If you list qualifying property in Part 1, line 9, below, you will be considered to have made this election. See instructions for details.

1 Maximum allowable GST exemption	1	
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 inter vivos 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 statement. See instructions	10	

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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

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 3.5)	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 17 of Part 2—Tax Computation	10	

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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 0.40). Enter here and on Schedule R, Part 2, line 9	8	

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SCHEDULE U—Qualified Conservation Easement Exclusion

Part 1. Election

Note: The executor is deemed to have made the election under section 2031(c)(6) if he or she files Schedule U and excludes any qualifying conservation easements from the gross estate.

Part 2. General Qualifications

- 1 Describe the land subject to the qualified conservation easement. See instructions _____
- 2 Did the decedent or a member of the decedent's family own the land described above during the 3-year period ending on the date of the decedent's death? Yes No
- 3 Describe the conservation easement with regard to which the exclusion is being claimed. See instructions.

Part 3. Computation of Exclusion

4	Estate tax value of the land subject to the qualified conservation easement (see instructions)	4	
5	Date of death value of any easements granted prior to decedent's death and included on line 10 below (see instructions)	5	
6	Add lines 4 and 5	6	
7	Value of retained development rights on the land (see instructions)	7	
8	Subtract line 7 from line 6	8	
9	Multiply line 8 by 30% (0.30)	9	
10	Value of qualified conservation easement for which the exclusion is being claimed (see instructions) Note: If line 10 is less than line 9, continue with line 11. If line 10 is equal to or more than line 9, skip lines 11 through 13, enter "0.40" on line 14, and complete the schedule.	10	
11	Divide line 10 by line 8. Figure to 3 decimal places (for example, "0.123") Note: If line 11 is equal to or less than 0.100, stop here; the estate does not qualify for the conservation easement exclusion.	11	
12	Subtract line 11 from 0.300. Enter the answer in hundredths by rounding any thousandths up to the next higher hundredth (that is, 0.030 = 0.03, but 0.031 = 0.04)	12	
13	Multiply line 12 by 2.0	13	
14	Subtract line 13 from 0.40	14	
15	Deduction under section 2055(f) for the conservation easement (see instructions)	15	
16	Amount of indebtedness on the land (see instructions)	16	
17	Total reductions in value (add lines 7, 15, and 16)	17	
18	Net value of land (subtract line 17 from line 4)	18	
19	Multiply line 18 by line 14	19	
20	Enter the smaller of line 19 or the exclusion limitation. See instructions. Also enter this amount on item 12, Part 5—Recapitulation, page 3	20	

Protective Claim for Refund

OMB No. 1545-0015

▶ **To be used for decedents dying after December 31, 2011. File 2 copies of this schedule with Form 706 for each pending claim or expense under section 2053.**

- Timely filing a protective claim for refund preserves the estate's right to claim a refund based on the amount of an unresolved claim or expense that may not become deductible under section 2053 until after the limitation period ends.
- Schedule PC can be used to file a protective claim for refund and, once the claim or expense becomes deductible, Schedule PC can be used to notify the IRS that a refund is being claimed.
- Schedule PC can be used by the estate of a decedent dying after 2011.
- Schedule PC must be filed with Form 706 and cannot be filed separately. (To file a protective claim for refund or notify the IRS that a refund is being claimed in a form separate from the Form 706, instead use Form 843, Claim for Refund and Request for Abatement.)
- Each separate claim or expense requires a separate Schedule PC (or Form 843, if not filed with Form 706).
- Schedule PC must be filed in duplicate (two copies) for each separate claim or expense.

Part 1. General Information

1. Name of decedent	2. Decedent's social security no.
3. Name of fiduciary	4. Date of death
5a. Address (number, street, and room or suite no.)	5b. Room or suite no.
5c. City or town, state, and ZIP or postal code	6. Daytime telephone number

7. Number of Claims. Enter number of Schedules PC being filed with Form 706. _____

If the number is greater than one OR if another Schedule PC or Form 843 was previously filed by or on behalf of the estate, complete Part 3 of this Schedule PC.

8. Fiduciary Check here if this Schedule PC is being filed with the original Form 706 or is being filed by the same fiduciary who filed the original Form 706 for decedent's estate. If a different fiduciary is filing this Schedule PC, see instructions for establishing the legal authority to pursue the claim for refund on behalf of the estate.

Part 2. Claim Information

Check the box that applies to this claim for refund.

a. Protective claim for refund made for unresolved claim or expense.

Amount in contest: _____

b. Partial refund claimed: partial resolution and/or satisfaction of claim or expense for which a protective claim for refund has been filed previously.

Date protective claim for refund filed for this claim or expense: _____

Amount of claim or expense partially resolved and/or satisfied and presently claimed as a deduction under section 2053 (do not include amounts previously deducted): _____

c. Full and final refund claimed for this claim or expense: resolution and/or satisfaction of claim or expense for which a protective claim for refund has been filed previously.

Date protective claim for refund filed for this claim or expense: _____

Amount of claim or expense finally resolved and/or satisfied and presently claimed as a deduction under section 2053 (do not include amounts previously deducted): _____

Estate of: _____ Decedent's social security number _____

A Form 706 Schedule and item number	B Identification of the claim • Name or names of the claimant(s) • Basis of the claim or other description of the pending claim or expense • Reasons and contingencies delaying resolution • Status of contested matters • Attach copies of relevant pleadings or other documents	C Amount, if any, deducted under Treas. Reg. sections 20.2053-1(d)(4) or 20.2053-4(b) or (c) for the identified claim or expense	D Amount presently claimed as a deduction under section 2053 for the identified claim	E Ancillary expenses estimated/ agreed upon/paid (Please indicate)	F Amount of tax to be refunded

Part 3. Other Schedules PC and Forms 843 Filed by Estate

If a Schedule PC or Form 843 was previously filed by the estate, complete Part 3 to identify each claim for refund reported.

A Date of death	B Internal Revenue office where filed	C Date filed	D Indicate whether (1) Protective Claim for Refund, (2) Partial Claim for Refund, or (3) Full and Final Claim for Refund	E Amount in Contest
1				

To inquire about the receipt and/or processing of the protective claim for refund, please call 866-699-4083.

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CONTINUATION SCHEDULE

Continuation of Schedule

(Enter letter of schedule you are continuing.)

Item number	Description. For securities, give CUSIP number. If trust, partnership, or closely held entity, give EIN.	Unit value (Sch. B, E, or G only)	Alternate valuation date	Alternate value	Value at date of death or amount deductible
TOTAL (Carry forward to main schedule.)					

**U.S. Estate Tax Return for
 Qualified Domestic Trusts**
 Calendar Year 2021

OMB No. 1545-1212

▶ Go to www.irs.gov/Form706QDT for instructions and the latest information.

Part I General Information

1a Name of trust Michael Kim, QDOT		1b EIN of trust 88-xxxxxxx
2a Name of trustee/designated filer (see instructions) Peter Kim		2b SSN or EIN of trustee/designated filer xxx-xx-xxxx
2c Address of trustee/designated filer xxxxxxxxxxxxxxxxxxx, San Francisco, CA 94123		
3a Name of surviving spouse (see Definitions in the instructions) Grace Kim		3b TIN of surviving spouse xxx-xx-xxxx
3c Surviving spouse's date of death (if applicable)		3d Surviving spouse's current marital status Single
4a Name of decedent Michael Kim	4b SSN of decedent 123-45-6789	4c Decedent's date of death April 15, 2020

Part II Elections by the Trustee/Designated Filer (see instructions)

Please check the "Yes" or "No" box for each question.

	Yes	No
1 Do you elect alternate valuation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2 Do you elect special use valuation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If "Yes," you must complete and attach Schedule A-1 of Form 706.		
3 Do you elect to pay the taxes in installments as described in section 6166?	<input type="checkbox"/>	<input type="checkbox"/>
If "Yes," you must attach the additional information described in the instructions.		
Note: By electing section 6166, you may be required to provide security for estate tax deferred under section 6166 and interest in the form of a surety bond or a section 6324A lien.		
4 If the surviving spouse has become a U.S. citizen, does he or she elect under section 2056A(b)(12)(C) to treat all prior taxable distributions as taxable gifts and to treat any of the decedent's unified credit applied to the QDOT tax on those distributions as the surviving spouse's unified credit used under section 2505? (If not a U.S. citizen, enter "N/A")	<input type="checkbox"/>	<input type="checkbox"/>

Part III Tax Computation

1 Current taxable trust distributions (total from Part II of Schedule A)	1	0
2 Value of taxable trust property at date of death (if applicable) (total from Part III of Schedule A)	2	
3 Add lines 1 and 2	3	0
4 Charitable and marital deductions. See Schedule B instructions (total from col. D, Part IV of Sch. A)	4	0
5 Net tentative taxable amount. Subtract line 4 from line 3	5	0
6 Prior taxable events (total from Part I of Schedule A)	6	0
7 Taxable estate of the decedent. See instructions	7	0
8 Add lines 6 and 7	8	0
9 Add lines 5 and 8	9	0
10 Recomputation of decedent's estate tax based on the amount on line 9. See instructions. Attach computation	10	0
11 Recomputation of decedent's estate tax based on the amount on line 8. See instructions. Attach computation	11	0
12 Net estate tax. Subtract line 11 from line 10	12	0
13 Payment made with request for extension, if any, and credit under section 2056A(b)(2)(B)(ii)	13	0
14 Tax due. (If the amount on line 12 exceeds the amount on line 13, enter the difference here.) ▶	14	0
15 Overpayment. (If the amount on line 13 exceeds the amount on line 12, enter the difference here.)	15	0

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

Sign Here	Signature _____		Date _____	
	Print/Type preparer's name Hyunsoo K. Ahn	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed
Paid Preparer Use Only	Firm's name ▶ H. Kenneth Ahn, Esq., A professional Corporation	Firm's EIN ▶ 45-4580125	PTIN P00289070	
	Firm's address ▶ 1426 Fillmore Street Ste 305, San Francisco, CA 94115	Phone no. (415) 474 8160		

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Schedule B To be completed by trustee. (continued)

Part IV Taxable Property in Trust at Death of Surviving Spouse

A Item No.	B Description	C Alternate Valuation Date	D Value
	Surviving spouse is still living		0
Total			▶

Part V Marital Deductions

A Item No.	B Description of Property Interests Passing to Spouse	C Value
	All properties of \$5,783,986 passing to Grace Kim, QDOT trust	
Total		▶

Part VI Charitable Deductions

A Item No.	B Description	C Name and Address of Beneficiary	D Character of Institution	E Amount
	None			None
Total				▶

Part II Living Insured

(File with Form 709, United States Gift (and Generation-Skipping Transfer) Tax Return. May also be filed with Form 706, United States Estate (and Generation-Skipping Transfer) Tax Return, or Form 706-NA, United States Estate (and Generation-Skipping Transfer) Tax Return, Estate of nonresident not a citizen of the United States, where decedent owned insurance on life of another.)

SECTION A—General Information

36 First name and middle initial of donor (or decedent)	37 Last name	38 Social security number
39 Date of gift for which valuation data submitted ▶		
40 Date of decedent's death for which valuation data submitted ▶		

SECTION B—Policy Information

41 Name of insured	42 Sex	43 Date of birth	
44 Name and address of insurance company			
45 Type of policy	46 Policy number	47 Face amount	48 Issue date
49 Gross premium		50 Frequency of payment	
51 Assignee's name			52 Date assigned
53 If irrevocable designation of beneficiary made, name of beneficiary	54 Sex	55 Date of birth, if known	56 Date designated
57 If other than simple designation, quote in full. Attach additional sheets if necessary.			

58 If policy is not paid up: a Interpolated terminal reserve on date of death, assignment, or irrevocable designation of beneficiary b Add proportion of gross premium paid beyond date of death, assignment, or irrevocable designation of beneficiary c Add adjustment on account of dividends to credit of policy d Total. Add lines 58a, b, and c. e Outstanding indebtedness against policy f Net total value of the policy (for gift or estate tax purposes). Subtract line 58e from line 58d	58a		
	58b		
	58c		
			58d
			58e
			58f
59 If policy is either paid up or a single premium: a Total cost, on date of death, assignment, or irrevocable designation of beneficiary, of a single-premium policy on life of insured at attained age, for original face amount plus any additional paid-up insurance (additional face amount \$ _____) (If a single-premium policy for the total face amount would not have been issued on the life of the insured as of the date specified, nevertheless, assume that such a policy could then have been purchased by the insured and state the cost thereof, using for such purpose the same formula and basis employed, on the date specified, by the company in calculating single premiums.) b Adjustment on account of dividends to credit of policy c Total. Add lines 59a and 59b d Outstanding indebtedness against policy e Net total value of policy (for gift or estate tax purposes). Subtract line 59d from line 59c.	59a		
	59b		
			59c
			59d
			59e

The undersigned officer of the above-named insurance company (or appropriate federal agency or retirement system official) hereby certifies that this statement sets forth true and correct information.

Signature ▶

Title ▶

Date of Certification ▶

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Instructions

Statement of insurer. This statement must be made, on behalf of the insurance company that issued the policy, by an officer of the company having access to the records of the company.

For purposes of this statement, a facsimile signature may be used in lieu of a manual signature and if used, shall be binding as a manual signature.

Separate statements. File a separate Form 712 for each policy.

Line 13. Report on line 13 the annual premium, not the cumulative premium to date of death.

If death occurred after the end of the premium period, report the last annual premium.

Paperwork Reduction Act Notice. We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to give us the information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number.

Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law.

Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file this form will vary depending on individual circumstances.

The estimated average time is:

- Recordkeeping** 18 hrs., 11 min.
- Learning about the form** 6 min.
- Preparing the form** 23 min.

If you have comments concerning the accuracy of these time estimates or suggestions for making this form simpler, we would be happy to hear from you.

See the instructions for the tax return with which this form is filed. Do not send the tax form to that office. Instead, return it to the executor or representative who requested it.

Qualified
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Estate
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Systems 27
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18 21

Checklists for Completing Form 706

To ensure a complete return, review the following checklists before filing Form 706.

Attachments . . .

- Death Certificate.
- Certified copy of the will—if decedent died testate, you must attach a certified copy of the will. If not certified, explain why.
- Appraisals—attach any appraisals used to value property included on the return.
- Copies of all trust documents where the decedent was a grantor or a beneficiary.
- Form 2848 or 8821, if applicable.
- Copy of any Form(s) 709 filed by the decedent, with "Exhibit to Estate Tax Return" entered across the top of the first page(s).
- Copy of Line 7 Worksheet, if applicable, with "Exhibit to Estate Tax Return" entered across the top of the page(s).
- Form 712, if any policies of life insurance are included on the return.
- Form 706-CE, if claiming a foreign death tax credit.