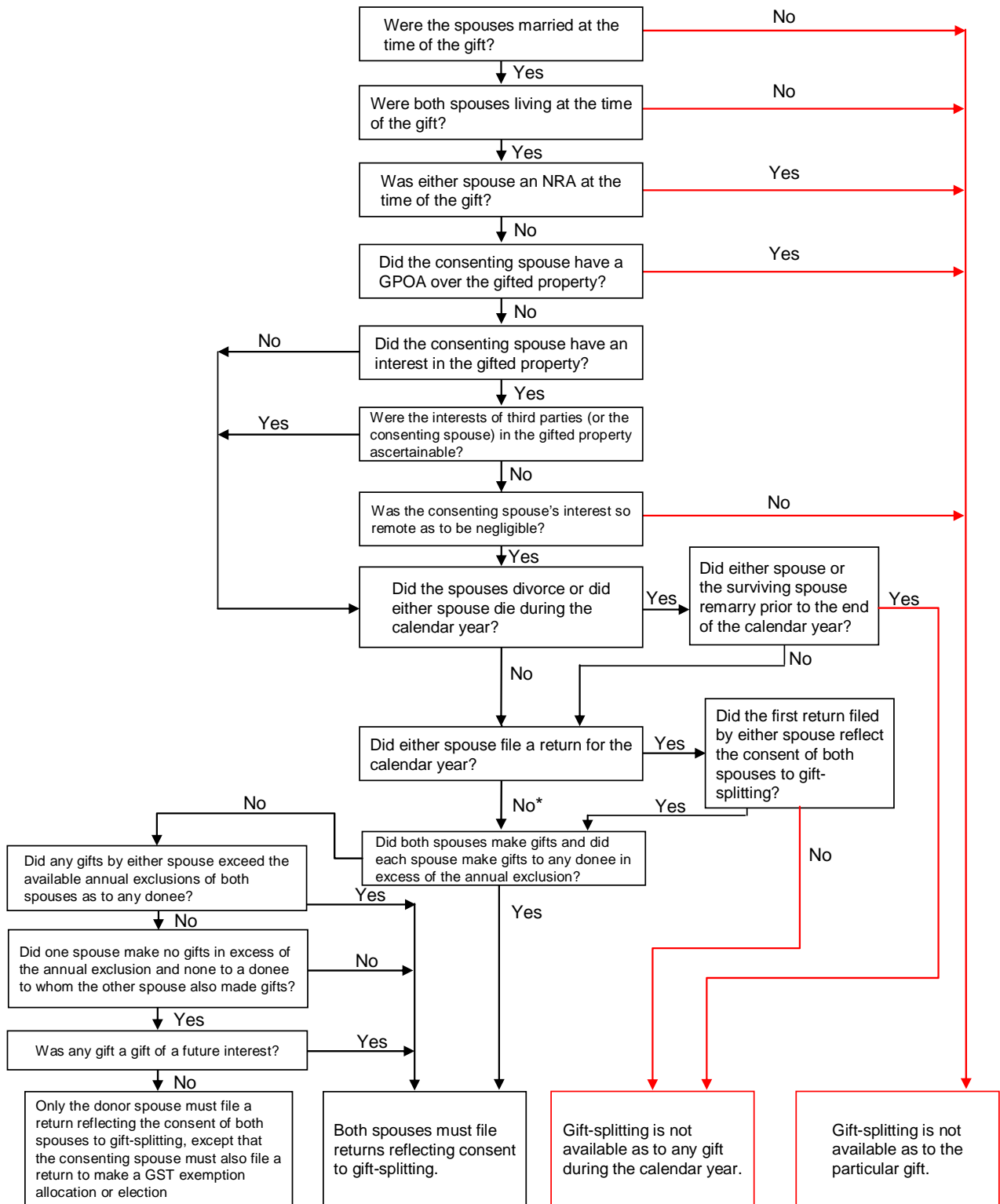


Gift-Splitting Decision Tree♦

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*If a notice of deficiency has been issued gift splitting is not available as to any gift.

♦ This flowchart assumes that a determination has been made that gift-splitting is appropriate and indicates whether gift-splitting is available and if so whether only one or both spouses must file gift tax returns to make an effective election.