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# Société de Banque Suisse Schweizerischer Bankverein Società di Banca Svizzera Swiss Bank Corporation

42, Avenue du Casino Téléphone 021/62 31 51 Télégrammes Suisbanque Telex 453141 bsmx ch Adresse SWIFT SBCOCH GG 18D

Office des chèques postaux

1800 Vevey

Votre réf.

n. service/réf.

TITRES/JI/et

Tél. interne

1820 Montreux

le 6 octobre 1981

Concerne: compte no 18-7393 au nom du Dr Paul Brunton, décédé le 27 juillet 1981

Messieurs,

En qualité d'exécuteur testamentaire, vous vous remettons une photocopie de la déllaration du Greffe de Paix de La Tour-de-Peilz et vous prions de bien vouleir clôturer le compte poséal susmentionné et de nous transférer le solde.

En vous en remerciant par avance, nous vous présentons, Messieurs, nos salutations distinguées.

SOCIETE DE BANQUE SUISSE

Annexes: -1- photocopie

-l- bulletin de versement



# Société de Banque Suisse Schweizerischer Bankverein Società di Banca Svizzera Swiss Bank Corporation

42, Avenue du Casino Teléphone 021/62 31 51 Télégrammes Suisbanque Telex 453141 bsmx ch Adresse SWIFT SBCOCH 6G 18D

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SOCIETE DE BANQUE SUISSE

Annexes: -1- photocopie

-I- bulletin de versement

Mr. George april 19, 1982 - Dat duty paid in Feb. 82 - Final statement in March SF 1800 (for autorities) - will transfer the addount, (Howar certificate for account) = How Certificate & Heir (Robate)
(a general certificate) Dear Duly = 5F 14,000

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/isa-Dossler **Portefeuille** Portafoglio Dr Paul BRUNTON Avenue des Alpes 107 ompte onto onto ccount 1814 LA TOUR-DE-PEILZ otre lettre du 522'739.5 or Brief vom Montreux, le 7.7.1981/ds ostra lettera del our letter of ous nous avez remis les appoints ci-dessous Sie sandten uns folgende Rimessen, Ci avete rimesso gli effetti sottoindicati, We received your remittance as specified below. ientionnés dont nous vous créditons s. b. f. wofür wir Sie, E. v., erkennen. per i quali vi diamo credito a. b. f. for which we credit you under the usual reserves. Nominal Chéques Place Déductions Net à votre crédit Nominal Checks Platz Abzūge Netto in Ihr Haben Val. Nominale Assegni Plazza Deduzioni Netto a vostro credito Nominal Cheques Place Deductions Net to your credit \$US 373.70 ch United States Treasury 6. -r. \*765.70 14.7. "au cours de 2.065" "Montant reçu de l'Embassy of the United States of America, Bern" I - Encalsaement P - Ports et frais Vos dévoués / Hochachtungsvoll / Con stima / Yours faithfully Inkasso Portl und Spesen Société de Banque Suisse / Schweizerischer Bankverein Incasso Porti et spese Società di Banca Svizzera / Swiss Bank Corporation Collection Postages and charges Formule sans signature Formular ohne Unterschrift Modulo senza firma

Form without signature

7182 N 2/4



Portefeullie Portafoglio

> Succession du Dr Paul BRUNTON

C

otre lettre du

Montreux, le 7.8.1981/ds Date Ort/Datum Luogo/Data Place Lieu / Date Place / Date

522'739.9

ous nous avez remis les appoints ci-dessous

Sie sandten uns folgende Rimessen,

Ci avete rimesso gli effetti sottoindicati,

We received your remittance as specified below,

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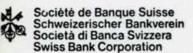
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Vos dévoués / Hochachtungsvoll / Con stima / Yours faithfully

Société de Banque Suisse / Schweizerlscher Bankverein Società di Banca Svizzera / Swiss Bank Corporation

Formule sans signature Formular ohne Untersch Modulo senza firma Form without signature

7182 N 1/4 2.80 30000



Bureau des chèques/Checkbüro/Ufficio Assegni/Cheque Department

Montreux, le 12.8.1981/ds ate Ort/Datum Luogo/Data Place/Date

eu/Date

← Réf./Rif.

alon vos instructions du emāss Ihrem Auftrag vom ome da vostre istruzioni del s per your instructions of

> Succession du Dr Paul BRUNTON

522'739.9

nous avons envoyé le chèque mentionné ci-dessous à haben wir folgenden Check gesandt an abbiamo spedito il seguente assegno a we have sent the following cheque to

SOCIAL SECURITY ADMINISTRATION c/o Embassy of the United States of America A l'att. de Monsieur Grander Jubiläumstrasse 93

3000 BERNE

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Importo	Piazza	Cambio	Spese	Netto a vostro debito	
Amount	Place	Rate	Charges	Net to your debit	
\$US 373.70	New York		3.15	\$US *376.85	Val. 12.8.1981

chèque no 11230 "Remboursement pension juillet"

Vos dévoués/Hochachtungsvoll/Con stima/Yours faithfully

Société de Banque Suisse/Schweizerischer Bankverein Società di Banca Svizzera/Swiss Bank Corporation

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ont nous vous débitons ofür wir Sie belasten cui vi addebitiamo. ir which we debit you.

7354 N 1/6 2.80 20000

# Duplicata

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1820 MONTREUX

5.10.81

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\*2,010.00 VAL. 5.10.81

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MONTANT RECU :

Au HOK

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Duplicata

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-2.010.00 VAL.

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1820 MONTREUX

5.10.81

28084 00045 59063

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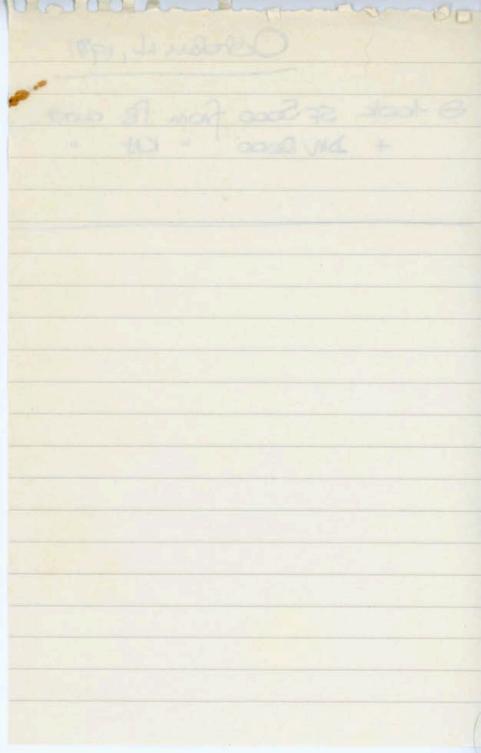
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With our kinder fregurals

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Avec les compliments de la



#### SOCIÉTÉ DE BANQUE SUISSE

1820 MONTREUX

Avenue du Casino 42 Tél. (021) 62 31 51

Jontre

wiss Ban hweizeri cietà di été de Banque Suisse chweizerischer Bankverein Società di Banca Svizzera Swiss Bank Corporation

SUCCESSION DU DR PAUL BRUNTON

C

Réf. / Rif.

Montreux, le 4.11.82/fb

Date / Datum / Data / Date

Selon vos instructions du Gemäss Ihrem Auftrag vom Come da vostre istruzioni del As per your instructions of

G5-522'739.9

nous vous remettons ci-joint erhalten Sie als Beilage vi rimettiamo qui unito we remit you herewith nous vous avons délivré à nos guichets haben wir Ihnen an der Kasse ausgeliefert vi abbiamo consegnato ai nostri sportelli we have delivered at our counters nous vous avons envoyé par commissionnaire sandten wir Ihnen durch Boten vi abbiamo spedito per corriere we sent you by messenger

le(s) chèque(s) suivant(s), dont nous vous débitons:

folgende(n) Check(s), wofür wir Sie belasten:

i seguenti assegni, del cui controvalore vi diamo debito in conto the following cheque(s), for which we debit you:

Net à votre débit Montant Place Cours Frais Kurs Spesen Netto in Ihr Soll Betrag Platz Netto a vostro debito Corso Spese Importo Piazza Amount Place Rate Charges Net to your debit \$US 1'062.45 New York 3.24 \$US 1'065.69 chèque no 011900 Val. 4.11.82

Vos dévoués/Hochachtungsvoll/Con stima/Yours faithfully

Société de Banque Suisse/Schweizerischer Bankverein Società di Banca Svizzera/Swiss Bank Corporation

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SUCCESSION DU DR PAUL BRUNTON

Bureau des chéques/Checkburo/Ufficio assegni/Cheque Dagartment

65-5221739.9

69°590, T 505 chèque no 011900 Va 4.11.82

Société de Banque Suisse/Schweizerischer Hankverein

PASCAL PITTET

(SUCCESSEUR DE ME M. CHESSEX)

CH-1820 MONTREUX LE 24 juin 1982 RUE DU THEATRE 3

ANCIENNE ÉTUDE M. CHESSEX - P. PITTET TÉL (021) 62 44 12

COMPTE DE CHÉQUES POSTAUX 18 - 359

Monsieur Kenneth Hurst Prentice/Hall International Englewood Cliffs New Jersey 67632 U.S.A.

conc. succ. de M. Paul Brunton

## HONORAIRES et DÉBOURSÉS

Fr. 284.-

Fr. 6.-

Février à Octobre 1981 Conférences Téléphones Correspondance Photocopies

TOTAL Fr. 290.-

Acquitté, le 1er octobre 1982

Avec nos remerciements. PASCAL PITTET

Avec les compliments

de Marc CHESSEX

p/a

du notaire Lascal Littet

Montreux

Monal sur Kenneth Surat

### PAUL BRUNTON #22

Dans l'event de mon mort, s.v.p. communiquer avec:

1. Dr. Jean Morier-Geneud Avenue de Blonay, 14 1800 Vevey

Tel: 54-12-77

2. M. Marc Chessex (Advocat)
rue du Theatre 3,
1820 Montreux

Tel: 62-31-51

62-44-12

3. M. Andre Gefeller
SOCIETE DE BANQUE SUISSE
Avenue du Caséno, 42
Montreux 1820

Tel: 62-31-51

## PAUL BRUNTON 122

Dans l'event de mon mort, s.v.p. communiquerravec:

Avenue de Blonay, 14 1800 Vevey

Tell 54-12-77

M. Marc Chessex (Advocat) rue du Theatre 3, CAN 1820 Montreux

Tell 62-31-53

TI-JUL-FO

M. Andre Gefeller SOCIETE, DE BANQUE SUISSE Avenue du Caséno, 42 Montreux 1820

TR-12-53 +1eT

May 19, 1982 M. IMHOF Sold 50 14 May KH Rod. SF/95 +191 432,000 May 14 TOTAL \$ 513,454 \$0,000 SF Coft = \$5000. will beid book - or Hoealing visit in Sept. 90 Swiss Bank Cop NYC \$195 343

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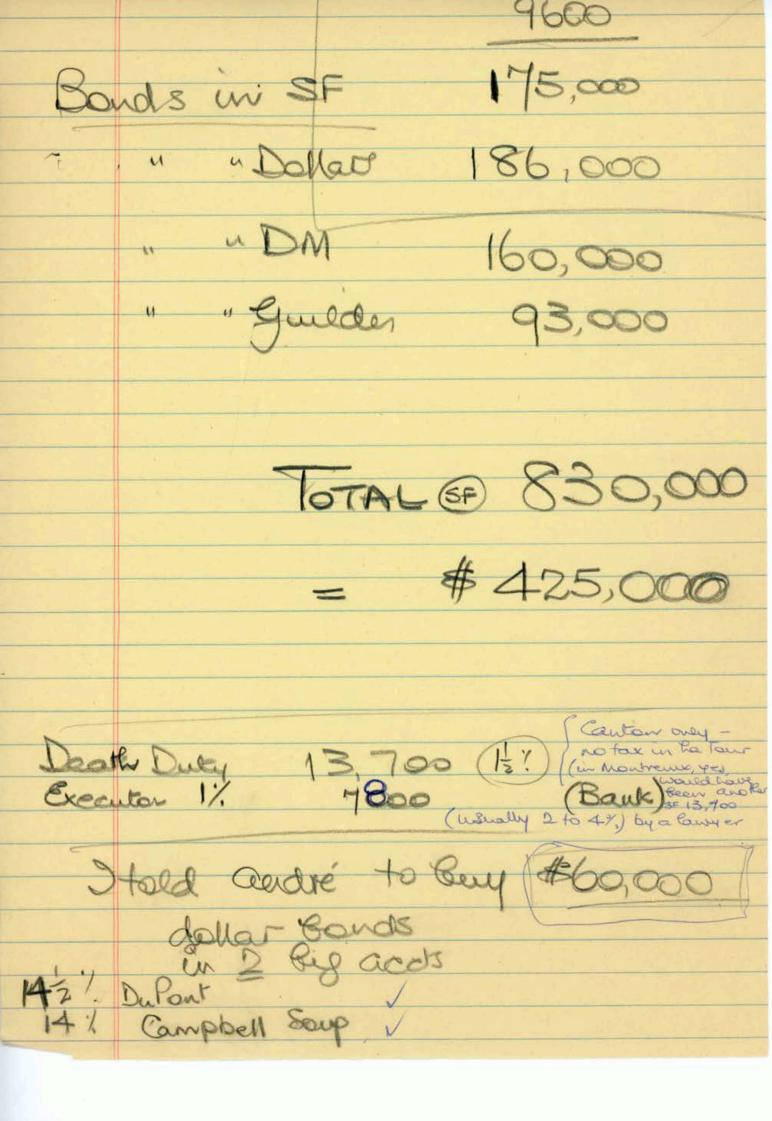
# N/V MONTREUX

- 1) Bank Collect 10,000 SF (\$5000)
- 2) Collect Safe Deposit Box items
- 3) Collect original g Certificate d'alhoritier (Probate g Court)
- 4) Collect Bank papers + destroy
- 5) Collect PB's mail to PB.
- 6) Buy Watch (\$2000)

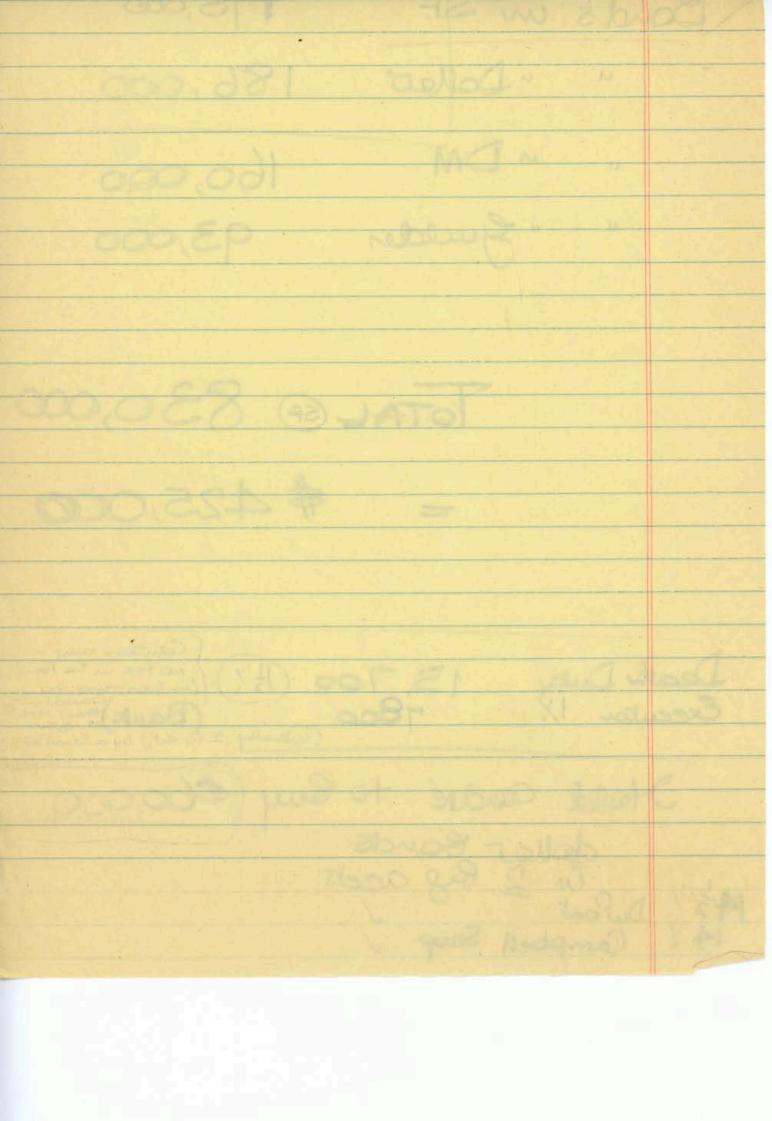
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## Société de Banque Suisse Schweizerischer Bankverein Società di Banca Svizzera Swiss Bank Corporation

Ropie golf. Hurst

42, Avenue du Casino Téléphone 021/62 31 51 Télégrammes Suisbanque Telex 453141 bsmx ch Adresse SWIFT SBCOCH GG 18D

GREFFE DE PAIX DE LA TOUR-DE-PEILZ ET VEVEY Place de l'Ancien Port 6 1800 VEVEY 1

Votre réf.

n. service/réf. AG/cb

Tél. interne

1820 Montreux

le 9 décembre 1981

Concerne : Succession de M. Paul BRUNTON

Messieurs,

Nous accusons réception de votre correspondance du ler décembre 1981 et vous retournons par la présente :

- la déclaration d'acceptation de succession dûment signée.

Nous vous rappelons que nous vous avons adressé antérieurement la photocopie d'une pièce d'état civil.

En ce qui concerne la clôture de l'inventaire de la succession de M.P.Brunton nous vous informons que nous sommes d'accord avec l'inventaire que vous nous avez établi le ler décembre 1981, à la date du décès de M. Brunton c'est-à-dire le 27 juillet 1981 et déclarons qu'il n'existe pas à notre connaissance, d'autres biens à y faire figurer.

Nous faisons parvenir au contrôleur du droit de mutation une liste de diverses factures concernant M. Brunton à faire valoir dans les déductions de la succession en question.

Dans l'attente de vos nouvelles, nous vous présentons, Messieurs, nos salutations distinguées.

~ ~ ~

DE BANQUE

P.MERINAT

A.GFELLER

Chef de succursale Fondé de pouvoirs

Annexe : ment.

Société de Banque Suleze Schreikzerfscher Bankverein Societé di Bance Svizzern Bertes Bank Corporation

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Concerns : Successful de M. Paul Billerin

ATTION DESIGNATION.

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dens l'attante de vos nouvelles, nous vous trisentons, fensionée, nos maluta-

scened knows addresses

CALIFFORM TAXABLE AND ADDRESS OF TAXABLE AND

Arme I second



- 1 7 MARS 1982

#### GREFFE DE PAIX

DE LA TOUR-DE-PEILZ ET VEVEY

Place de l'Ancien Port 6 Case postale 26 1800 Vevey 1

> CCP 18 - 891 Tél. 021 / 51 03 25

Vevey, le 16 mars 1982/fe

SOCIETE DE BANQUE SUISSE Avenue du Casino 42

1820 MONTREUX

Monsieur,

Concerne : succession de M. Paul BRUNTON

Les opérations de liquidation concernant la succession susmentionnée, étant terminées en ce qui concerne l'Office de Paix, je vous adresse avec la présente, notre liste de frais s'élevant à fr. 1'821.- , montant dont vous voudrez bien me couvrir à votre convenance.

A réception de ce montant, je vous enverrai les pièces y relatives.

Veuillez agréer, Monsieur , mes salutations distinguées.

Figle 6 18.3.8n

LE GREFFIER DE PAIX :

Annexes : ment.

+ 1 bul. vers.

SBS Montreux

GREFFE DE PAIX

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Place de l'Ascien Port I Cres postore (8 1900 Vever 1

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SOCIETY DE SANOTE SUITES

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PAYE 8 Milis 1982 Ses Montteux

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Liste de frais pour la succession de M. Paul BRUNTON

décédé le 27 juillet 1981

19	Tarif			Juge	Greffier	Huissier	Déboursés
	99	mesures conservatoires, inventaire, scellés,	( heure(s)	36	24	21.50	
	99	travaux préparatoires	( heure(s)		90		
	100	réception et homologation de testament		246	164	10	
	102	certificat d'héritier		527.40	351.60	10	
	102	attestation exécuteur testamentaire		3	2		2
	148	service à l'audience					
	149	assistance à					
	107a	attestations d'héritier		24.30	16.30		
	107b	déclarations de transfert					
	112	déclarations		3	2		2
	101	ordonnance d					
	103	enregistrement d					
	104	prononcé sur					10
	139	recherches au registre foncier, à l'état civil, aux archi	ves ( heure(s)		12		
	139	réquisition et retrait d'état descriptif					
	141	présentation et retrait au registre foncier					
	160	garde de valeurs					
	126	réception et conservation du testament					
	133	légalisations		4			
	140	annulation d'estampilles			8	.	
	134	1					
	81	procès-verbaux, extraits, copies, écritures	( page(s)		104.40		2.20
	82	lettres, correspondance	( page(s)		56		3.50
	154/2	transports	0 0 0 0	6.40	******	3.20	3.20
	143	liste de frais			8		
	154	déboursés, ports, téléphones					75
			Juge	850.10	838.30	44.70	87.90
r. 1'82	21 à faire p	parvenir franco	Greffier	838.30	Payé, le		
u Greffe de j	paix à Vev	ey , dans les 10 jours.	Huissier	44.70	ZW		
			Déboursés	87.90			
V	Vevey, le 1	6 mars 19 82		1821			
e juge de pa	ix. h	Ae greffier :	TOTAL Fr.	1021			

PAYÉ 1 8 MARS 1982 **SBS Montreux** 

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PAYE 1 8 MARS 1982 SBS Montreux Copie pour 17. Hunt

Commission d'impôts A l'att. de M.Eric Horisberger Contrôleur du droit de mutation Cour au Chantre

1800 VEVEY

AG/cb

le 11 décembre 1981

Concerne : Succession de M. Paul BRUNTON, La Tour-de-Peilz

Monsieur,

Nous référant à la lettre du ler décembre 1981 du Greffe de Paix de La Tour-de-Peilz concernant la succession susmentionnée, nous vous donnons ci-dessous la liste des diverses factures à faire valoir dans les déductions de la succession en question :

	Dr Guido Fisch, Lausanne	Frs.	340
29.07.81	Hôpital du Samaritain, Vevey	Frs.	1'603.30
14.08.81	M. Jean MORIER-Genoud, Vevey	Frs.	250
20.08.81	R. Ducrest, Pompes Funèbres Générales		1'805.90
10.09.81	Direction des téléphones, Lausanne	Frs.	752
24.09.81	PTT	Frs.	600
24.09.81	Gérances Stoudmann & Cie, Lausanne	Frs.	129
		Frs.	5'480.20

Ci-joint vous trouverez photocopies des justificatifs.

En outre, nous vous signalons que nos honoraires d'exécuteur testamentaire s'élèveront à Fr. 8'000.- ce dont nous vous prions de prendre également en considération.

Veuillez agréer, Monsieur, nos salutations distinguées.

SOCIETE DE BANQUE SUISSE

P.MERINAT J-P MATTI

Chef de succursale Fondé de pouvoirs

Annexes :mnet

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Cominsion d'impôts à l'att. de H.Eris Horisberger Contrôleur de droit de motation Deur pu Chantre

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COLUMN TO ADMINISTRATION AND ADDRESS.

Communical Dissessation do N. Paul Schutter, La Tour-de-Paille

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ASSESSMENT OF PERSONS ASSESSMENT

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Société de Banque Suisse Schweizerischer Bankverein Società di Banca Svizzera Swiss Bank Corporation

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DIV

R000001\*

1820 MONTREUX

29.07.81

SAVINGS ACCOUNT

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Réf./Rif. + 620/G5-13208.GA 0002/27565

DEBIT ADVICE

WE HAVE DEBITED YOUR ACCOUNT AS

SUCCESSION DU C 4

S.FR.

AMOUI

ORDER: VPD 29.07.81

FISCH, DR GUIDO

HOPITAL DU SAMARITAIN

B.C.V. LAUSANNE 1800 VEVEY

449280

340.0

DEBIT

1,943.3

VAL

29.07.81

FORM WITHOUT SIGNATURE

11000 N 181 4000000

COMPTE DE LA CUCO POSTA DE LA COMPTE

¿UIDO FISCH ecine Générale one (021) 37 35 12

1004 LAUSANNE, le 2h . 7 . 1981 SB Chemin du frêne 11

Monsieur
Brunton Paul
Av. des Alpes 107
1814 LA TOUR DE PEILZ

Le Docteur Guido Fisch vous présente ses compliments et vous informe du montant de ses honoraires pour soins donnés du 6. 7. 1981 au 20. 7. 1981

Fr. 340.-

THE REAL PROPERTY.

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HOPITAL DU SAMARITAIN

CCP : 18-992 VEVEY BCV VEVEY: 18-600 C774.624 **FACTURE N°** 

84432/8107

(ce numéro doit être rappelé dans toute correspondance)

1800 VEVEY, LE

27.07.81

A., Mme, Mile

, BRUNTON PAUL

AV. DES ALPES 107 1814 TOUR-DE-PEILZ Concerne:

DO

27.11.98

SANS ASSURANCE

Date		Description	Quantité	Prix unit.	Montant
5.07 5.07 5.07 5.07 6.07 6.07 6.07 6.07	LABORATOIRE	(1 LIT) AU 27.07.81 SURVEILLANCE PERMANENTE 1660 1661 1643 1647 1331 DR BERGER,  1718 1602 1609 1660 1661 1643 1643	3 3 1 1	140,00	
our d'ent	trée et le jour de sortie sont facturés inté	gralomont	REPORTER	TŎŤAĽX	1034,90

our d'entrée et le jour de sortie sont facturés intégralement. illez conserver cette facture pour votre déclaration d'impôts. is tiendrons compte de votre dépôt lors du règlement final. able à 30 jours ou par acomptes selon entente préalable.

Gestronic Service Bureau

HOPITAL DU SAMARITAIN 1800 VEVEY

: 18-992 VEVEY

BCV VEVEY: 18-600 C774.624

M., Mme, Mlle

BRUNTON PAUL

AV. DES ALPES 107 1814 TOUR-DE-PEILZ **FACTURE N°** 

84432/8107

PAGE

(ce numéro doit être rappelé dans toute correspondance)

1800 VEVEY, LE

27.07.8

Concerne:

DO

27.11.5

#### SANS ASSURANCE

Date	Description	Quantité	Prix unit.	Montant
	REPORT	41		1034,9
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jour d'entrée et le jour de sortie sont facturés intégralement. uillez conserver cette facture pour votre déclaration d'impôts. us tiendrons compte de votre dépôt lors du règlement final. yable à 30 jours ou par acomptes selon entente préalable.

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Société de Banque Suisse Schweizerischer Bankverein Società di Banca Svizzera Swiss Bank Corporation 1.4

AOI

M000001\*: R 1541

1820 MONTROUX

14.00.61

SAVINGS ACCOUNT

Réf./Rif.→620/G5-13402.0001 27565

DEBIT ADVICE

WE HAVE DEBITED YOUR ACCOUNT AS FELLOWS:

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I DU RUNTON	С	. 4
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S.FR.

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- ORDER: VPO 13.08.E1

IN FAVOUR ACC.
MONSIEUR
AVENUE DE BLONAY 14

JEAN MORIER-GENEUD 1800 VEVEY DEBIT

250.

HUNDRAIRES DU 5.8.81

VAL

14.08.81

DOCTEUR JEAN MORIER-GENOUD V

VEVEY, LE 5.8.81

AVENUE DE BLONAY 14 1800 VEVEY TEL. (021) 51 54 97

# NOTE D'HONORAIRES

POUR SOINS DONNÉS A Monsieur Paul Brunton du 14.11.80 su 1.5.81

250.-

PAYÉ 1 + ASUT 1981 · SS3 Montroux

COMPTE DE CHÉQUES POSTAUX 18-5413

O. O. C. Donney

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20.08.81

SAVINGS ACCOUNT

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27565

G5-522,739.5

DEBIT ADVICE

WE HAVE DEBITED YOUR ACCOUNT AS FOLLOWS:

SUCCESSION DU DR PAUL BRUNTON

C

S.FR.

AMOUNT

ORDER: VPO 20.08.81

IN FAVOUR PC-NO 18-2339

OMPES FUNEBRES

MONTR EUX

DEBIT

1,805.90

ACTURE NO 4936

VAL

20.08.81

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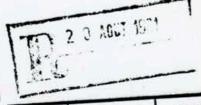
THUOSON 2001 PARTY ACCOUNT ACC



# FACTURE N

TELEPH. 021 / 61 21 29 CHÉQUES POST. 18-2339 RUE DE LA GARE 20

S B S A l'att. de M. IMHOF Avenue du Casino 1820 MONTREUX



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orbillard Montre		ir la Malson	et Honoraires
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The Roman way of the VAUDOISE CRÉMATION

Indée en 1890

1021) 22 15 33

Viaux 10 - 826

1000 Lausanne, le 1 mars 1972

٦

Longieur Poul BELATON-Class 14, chemin de Ballalay

1820 L U N T L F U X

M onsieur,

L

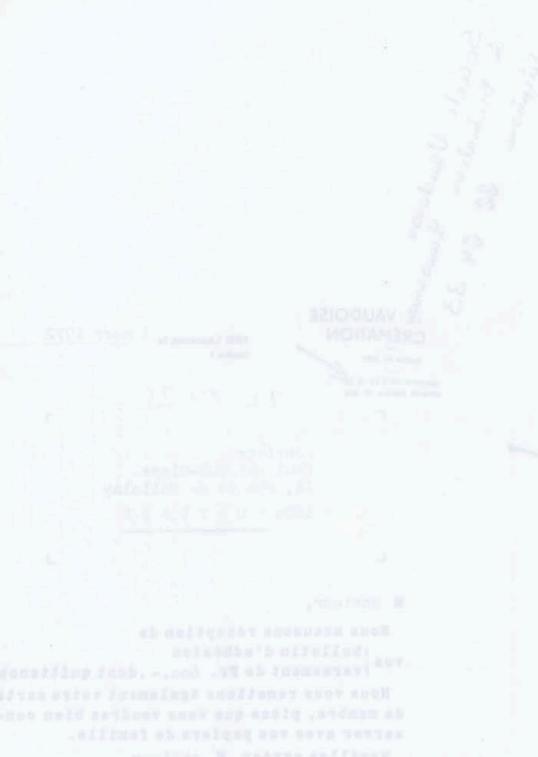
Nous accusons réception de bulletin d'adhésion vos versement de Fr. 600.- .dont quittance.

Nous vous remettons également votre carte de membre, pièce que vous voudrez bien conserver avec vos papiers de famille.

Veuillez agréer, M onsieur, nos salutations distinguées.

SOCIÉTÉ VAUDOISE DE CRÉMATION

Annexe:



En cas de décès, avertir immédiatement une entreprise de pompes funètres.

### Listes des fournisseurs de la Société

LAUSANNE
POMPES FUNEBRES GÉNÉRALES S.A.
Rue du Maupas 6
Tél. (021) 20 38 01 Adr. télégr.: NECROS Lausanne
POMPES FUNÉBRES OFFICIELLES DE LA VILLE DE
LAUSANNE. Beau-Séjour 8
Tél. permanent (021) 20 42 51

POMPES FUNÉBRES DE SAINT-LAURENT S. A. Rue Saint-Laurent 12 Edmond Monney, directeur. Tél. (021) 22 54 10.

VEVEY
POMPES FUNÈBRES GAVILLET & BRUNET
Rue du Conseil 25 Tél. permanent (021) 51 41 80.

MONTREUX
POMPES FUNÉBRES GÉNÉRALES S. A.
Grand'Rue 73. M. Roger Ducret, directeur
Tel. (021) 61 21 29. Adr. télégr.: NECROS, Montreux

AIGLE
POMPES FUNÉBRES D'AIGLE Av. des Ormants 16.
Tel. (025) 2 23 63.

MORGES
POMPES FUNÉBRES ARNOLD FRÉRES, MORGES
Tel. (021) 71 23 43. Rue Ls de Savole 30.

ORBE
POMPES FUNÈBRES BOURGEOIS, succ. M. Perusset
Tél. permanent (024) 7 22 78.
En cas de non-réponse (024) 7 29 27.

LES CHARBONNIÈRES
POMPES FUNÉBRES DE LA VALLÉE ET ENVIRONS
Robert Rochat. Tél. (021) 85 12 53.
En cas de non réponse (021) 85 13 37.

Y V E R D O N
POMPES FUNÉBRES FRANÇOIS SCHNEITER
Rue d'Orbe 53 bis Tél. (024) 2 46 97

SOCIÉTÉ VAUDOISE DE CRÉMATION

# Carte de membre

№ 19029

M \_onciour

Paul Maulich-Gless
L., chemin de ballalay
Luce L U L T L E U L

Lausanne, le 23 fevei r 1972

Le Président :

Le Secrétaire :

Achura By Bonzon

Carte à conserver

dans le même pli que l'acte de nalssance, l'acte de mariage ou le livret de famille.

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ÉTÉ VAUDOISE JE CRÉMATION

Fondée en 1890

Téléphone 021 Chéques postaux 10-826

1f

1003 Lausanne, le 5 octobre 1981 Caroline 1

Monsieur IMHOF Société de Banque Suisse Avenue du Casino 42 1820 MONTREUX

Concerne: Incinération de Monsieur le docteur Pierre BRUNTON-

Monsieur,

Suite à votre téléphone de ce jour, nous vous remettons ci-inclus photocopies de la facture des Pompes Funèbres Générales de Montreux et de la commune de Vevey, payées par nous.

Veuillez agréer, Monsieur, nos salutations distinguées.

Société vaudeisa de cremanad :

- n Le Commit Forestier

annexes:ment.

BELOGUAY STA. HE CREMATION

1901 militar ? s'assauries

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Mentalin de Gentee Sulare Anglie de Gentee Sulare Anglie de Cantas 42

Concerned Lacindration or Monateur le doctour Pierry UNUITON-

Reng Learn.

Duite A votes toldplane de ce jour, nous vous remetimes ol-inclus placescopies de la facture des Pompes Pumblires desdriches de Nontreus et de la commune de Vevey, paydes par noués

Peutites agréer, Monitour, nos calutarions distinguissa.

Annual or the second of the last

JOHN BYRTHE

VILLE DE VEVEY



## **DIRECTION DE POLICE**

Telephone 51 00 21 Chèques postaux 18-4

at

Cimetière et crématoire

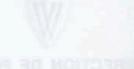
Facture Nº D 8847

Delai de paiement: 3 septembre 1981

SOCIETE VAUDOISE DE CREMATION Caroline 1

1000 LAUSANNE

Renouvellement Emolument Texte Organiste Incinération A PAYER Inhumation Divers conce on marbrier





R. DUCREST, Dir.

Concessionnaires Officiels du Corbillard Montreux Vertaux

# PHOTOCOPIE PHOTOCOPIE

FACTURE Nº 4935 GG/cc

TÉLÉPH. 021 / 61 21 29 CHÉQUES POST. 18 - 2339 RUE DE LA GARE 20

SCTE VAUDOISE DE CREMATION 1, rue de la Caroline 1003 LAUSANNE

		Débours avancés par la Maison	Fournitures et Honoraire
07 81	Décès de Monsieur BRUNTON Paul Dr		
	Fourniture d'un cercueil pour inciné- ration  Transfert du corps de l'hôpital des Sa- maritains au centre funéraire de Vevey		300
	TOTAL NET	FR	410
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AND PERSONS ASSESSED.

# PHOTOCOPIE

WATER OF STREET

To Find the Land Line

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Société de Banque Suisse Schweizerischer Bankverein Società di Banca Svizzera Swiss Bank Corporation

1820 MONTREUX

10.09.81

SAVINGS ACCOUNT

COL

Réf./Rif.→ 620/G5-13727.0001

27558

65-522,739.5

DEBIT ADVICE

WE HAVE DEBITED YOUR ACCOUNT AS FULLOWS:

SUCCESSION DU DR PAUL BRUNTON

S.FR.

AMOUN

ORDER: VPG 10.09.81

IN FAVOUR PC-NO 103000 DIR.ARROND.TELEPHONE

LAUSANNE -103000-

DEBIT

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SEPTEMBRE 81 021/54.96.71 VAL

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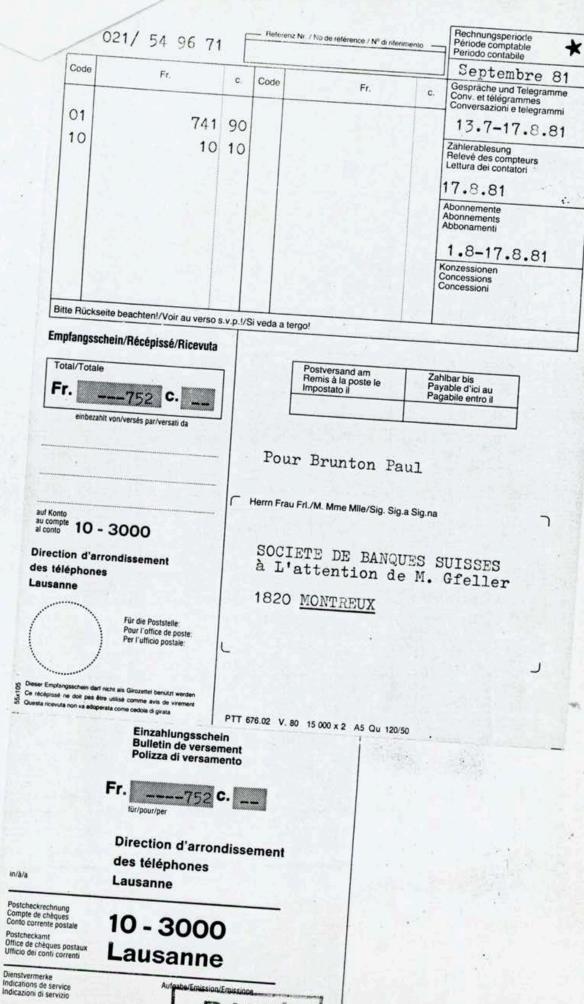
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DEPARTMENT OF THE PROPERTY OF

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#### Facture des taxes de télécommunications celecomunicazioni



105



Société de Banque Suisse Scriweizèrischer Bankverein Società di Banca Svizzera Swiss Bank Corporation

1828 M D N T R E U X

24.09.81

27559 00003 60941

PRELEVEMENT A LA CHARGE DE

BRUNTON PAUL FEU TOUR

G5-522,739.5 SAVINGS ACCOUNT

FR.S.

\*600.00 VAL. 24.09

COMPLEMENT PAIEMENT LOYER 1.7.80/SEL.RAPT.PTT.ANN.

MONTANT RECU :

l'exécuteur testamentaire

BBS, Mentreux

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ost-, Telephon- und Telegraphenbetriebe es postes, téléphones et télégraphes suisses a svizzera delle poste, dei telefoni e dei telegrafi

Telegramm-Adresse Adresse télégraphique Indirizzo telegrafico

Postcheckkonto Compte de chèques postaux Conto corrente postale Monsieur Gfeller c/o S.B.S 1820 Montreux

40 \_\_\_\_\_

Ihre Zeichen Votre signe ihre Nachricht vom Votre communication du Vostra comunicazione del Unsere Zeichen Ir/mo Notre signe Nostro riferimento Datum 23.9.81

#### Concerne versement de Monsieur Brunten

Gegenstand Objet Oggetto du 1.7.81

Monsieur,

En confirmation de notre entretien oral à nos guichets, nous vous remettons une photocopie de la feuille de jeu de guichet sur laquelle il apparaît bien que le versement de Monsieur Brunten a bien été encaissé et comptabilisé pour Fr. 140.- et non pour Fr. 740.-. Monsieur Brunten a payé avec un billet de Fr. 1.000.- et notre demoiselle lui a rendu Fr. 860.- sans qu'il y ait eu réaction de sa part quant à la somme rendue.

Veuillez agréer, Monsieur, l'expression de notre considération distinguée.

OFFICE DE POSTE DE VEVEY

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Société de Banque Suisse Schweizerischer Bankverein Società di Banca Svizzera **Swiss Bank Corporation** 

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M000001# Z1 R 2138

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1820 MONTREUX

24.09.81

SAVINGS ACCOUNT

Réf./Rif. > 620/65-13830.0001

27558

G5-522,739.5

C

S.FR.

DEBIT ADVICE

WE HAVE DEBITED YOUR ACCOUNT AS FOLLOWS:

SUCCESSION DU DR PAUL BRUNTON

ORDER: VPO 23.09.81

IN FAVOUR PC-NO 10-998 GERANCES STOUDMANN

LAUSANNE

& CIE

DEBIT

129.00

AMOUNT

VAL

24-09-81

FACT. DU 23.9.81

FORM WITHOUT SIGNATURE

F 41000 N 5.81 10000000

THE PROPERTY OF STREET THE STREET STR



### GERANCES P. STOUDMANN - SOCIÉTÉ DE GESTION IMMOBILIÈRE



S22739 /5 .

Monsieur
Paul BRUNTON
Av. des Alpes 107
1814 LA TOUR-DE-PEILZ

Bus du Maugas 9. Bare postein 2020 1839 Saucentes 76 Despris 221 - 40 52 02 Chèques posteus 10 - 1027

Réf. 64/ 12 b Dossier 2169

Lausanne, le

2 3 8 19 1931

Immeuble: Av. des Alpes 107, LA TOUR-DE-PEILZ

COMPTE DE CHAUFFAGE ET D'EAU CHAUDE

du 1er juillet 1980 au 30 juin 1981

Coût total : Fr. 23'999.--

Prix du m3 : chauffage

eau chaude Fr. 6.1330

5) Votre participation :

Taux d'oc- Coeffi- A CLASCEP

Chauffage

m3 à

%

Eau chaude

m3 à

158

x Fr. 6,1330

969.--

840 . --

Acomptes

F

F

F

Solde en votre faveur

Solde en notre faveur

F 129.--

- a) Montant que nous vous adresserons dans les 30 jours, sous déduction des frais de port, aucune retenue ne devant être faite sur le prochain paiement de votre loyer.
- b) Montant que vous voudrez bien nous faire parvenir dans les 30 jours, au moyen du bulletin de versement ci-joint.

Le compte détaillé, avec pièces justificatives, est à votre disposition à nos bureaux pour y être consulté <u>sur rendez-vous</u>, dans les 30 jours.

GERANCEE R. STOUDHALM SOCH S.

La compte détaillé, avec pièces justificatives, est à votre dispo-sition à mes beresus pour y être consilté mis innées-vous, dans les



## POMPES FUNÈBRES GÉNÉRALES S.A. LAUSANNE

SIÈGE SOCIAL LAUSANNE MAUPAS 6 NOUVEAU NUMERO DES LE 1er AVRIL 1971 (021) 20 38 01

Lausanne, date du timbre postal.

M.,

Nous avons appris que vous aviez donné récemment votre adhésion à la Société Vaudoise de Crémation, choisissant ainsi l'incinération pour votre sépulture.

A cette occasion, nous prenons la liberté de vous informer que notre entreprise, fondée en 1870, est concessionnaire depuis toujours de la Société Vaudoise de Crémation. Dès sa création, elle a été chargée de la fourniture des cercueils et des transports funèbres aux crématoires.

Pour obtenir ses services quand survient le décès d'un membre de la Société Vaudoise de Crémation, il suffit de téléphoner immédiatement au N° (021) 22 92 01 à Lausanne, en vue de la fixation, sans frais supplémentaires, du jour du convoi et de l'heure de la cérémonie.

Vous pouvez également appeler l'une des personnes ci-après désignées si vous n'habitez pas Lausanne :

				and the second second			
Aigle :	M. Rossier	Tél.	2 26 58	Monthey:	M. Delacoste	Tél.	4 24 18
Aubonne :	M. Moinat	Tél.	76 50 82	Montreux et			
Avenches:	M. Guillod	Tél.	8 32 99	Vevey:	M. Ducret	Tél.	61 21 29
Bex:	M. Bruguier	Tél.	5 23 24	Moudon:	M. Faucherre	Tél.	95 21 17
Bulle :	M. Barras	Tél.	2 85 57	Nyon:	M. Rossier	Tél.	61 25 16
Châtillens :	M. Piretti	Tél.	93 71 08	Oron :	M. Destraz	Tél.	93 71 60
		Tél.	93 71 09	Payerne:	M. Burger-Dupperrex	Tél.	6 26 66
Cossonay:	M. Rochat	Tél.	87 16 85	Rolle :	M. Chaney	Tél.	75 17 50
Fribourg :	M. Bugnard	Tél.	2 39 95		M. Ulliel	Tél.	75 17 58
Leysin:	M. Nicod	Tél.	6 21 51	Sion:	M. Voeffray	Tél.	2 28 30
Lucens:	M. L'Eplattenier	Tél.	95 82 22	Yverdon:	M. Schmidhauser	Tél.	2 21 79
Martigny:	M. Naefen	Tél.	6 12 95		M. Nicolier	Tél.	2 29 10

Afin d'éviter des recherches fastidieuses aux membres de votre famille quand vous décéderez, nous nous permettons de vous remettre, en annexe, une pochette destinée à réunir les actes d'état civil et la carte de membre de la Société Vaudoise de Crémation donnant droit aux diverses prestations gratuites.

Veuillez agréer, M., nos salutations très distinguées.

POMPES FUNÈBRES GÉNÉRALES S.A. LAUSANNE

Concessionnaires de la Société Vaudoise de Crémation



## POMPES FUNEBRES GENERALES SA.

LEVING MOST

COLUMN AT

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None avons appria que vous aviaz danné récemment votre adhésion à la Société Vaudoine de Crémation, cholalesant ginei l'incinération pour votre sépulture.

A cella occasion, note prenone la illanté de vous informer que notes antreprise, fondée en 1970, est concessionneire depuis toejours de la Société Veudoine de Crémation. Dies se création, elle a été chargée de la fourniture des cercuelle et des remisporte fundome aux crématoines.

Pour obtacir use aerices quant survierd le décès d'un membre de la Société Vaudoies de Coimellon, il suffit de téléphones immédiatement su NP (021) 22 92 01 à Leutenne, en vue de la facilion, sans trais augolòmentaires, que jour du convoi et de l'heure de la cérémonie.

Vous pouvez Applicated appellar l'una des parsonnes el après déalgrans el vous n'habites pas Lausannes

energial A				Algle: Anhense:

Afts d'éviter des recherches factifiques aux membres de votre families quand vous décédens, nous nous permettons de vous remettre, un aucess, une posteute destinée à réunir les actes d'état civil et la carre de membre de la Societé Vandoise de Colonation donness droit aux diverses prestations gratuites.

Vesilles aproer, M., nos salutations très distinguêns.

POMPES FUNIENCS OGNÉRALES G.A. LAVBANNE

Consessionestree de la Sontité Vaudutes de Crémittes

SOCIÉTÉ VAUDOISE DE CRÉMATION

Fondée en 1890

Téléphone 021 Chèques postaux 10-826

1f

1003 Lausanne, le 5 octobre 1981 Caroline 1

Monsieur IMHOF Société de Banque Suisse Avenue du Casino 42 1820 MONTREUX

Concerne: Incinération de Monsieur le docteur Pierre BRUNTON-

Monsieur,

Suite à votre téléphone de ce jour, nous vous remettons ci-inclus photocopies de la facture des Pompes Funèbres Générales de Montreux et de la commune de Vevey, payées par nous.

Veuillez agréer, Monsieur, nos salutations distinguées.

Société vaudoise de cremation:

annexes: ment.

SOCIÉTÉ VAUDOISE DE CRÉMATION

1003 Laurence, in 5 October 1981

CORP. no. oktoor?

Printed St. American

H

Monsteur IMHOF Société de Banque Buisse Avenue du Casino 42 1820 MONTREUX

Concerns: Incinération de Monsieur le Mocteur Pierre BRUNTOR-

Noneleur,

Suite à votre téléphone de ce jour, nous vous remettons el-inclus photocopies de la facture des Pompes Funébres Générales de Montreux et de la commune de Vevey, payées par nous.

Ventiles egrypta Moneteur, nos salutations distinguées.

Comments so exister attends

.Jusm: mexenue

VILLE DE VEVEY



#### DIRECTION DE POLICE

Téléphone 51 00 21 Chèques postaux 18-4

at

#### Cimetière et crématoire

Facture Nº **D** 8847

Délai de paiement: 3 septembre 1981

SOCIETE VAUDOISE DE CREMATION Caroline 1

1000 LAUSANNE

Date	Texte	Organiste	Incinération	Inhumation	Renouvellement concession	Emolument marbrier	Divers	A PAYER
3.8.1981	Incinération du corps de M. Paul BRUNTON le 29 juillet 1981, décédé le 27 juillet 1981	501.4356	606.4342		•			- 65

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Concessionnaires Officiels du

# PHOTOCOPIE

FACTURE Nº 4935 GG/cc

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SCTE VAUDOISE DE CREMATION 1, rue de la Caroline 1003 LAUSANNE

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S.V.P. dans l'event de la mort du Dr. Paul Brunton, communiquer a Kenneth T. Hurst par:

- (1) <u>Telex</u> 135423 New Jersey
  Attention Kenneth Hurst
- (2) <u>Cable PRENHALL</u> Englewood Cliffs, New Jersey
  Attention Kenneth Hurst
- (3) <u>Telephone a son bureau</u>

  (201) 592-2911--(in Englewood Cliffs, New Jersey, U.S.A.)
- (4) Telephone a son domecile

  (914) 358-6692--(in Valley Cottage, New York, U.S.A.)
- \*\*\*Please note the local U.S.A. time is 5-6 hours behind Swiss time.

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ENGLISH	SPEAKING	LAWYERS

	FUGUIOU SLEWIT	NG THA	TENO	Professional Specialities
	GENEVA		Tel. No	apart from normal legal Activities
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/	Me Michael BRANDON, MA, LL.M., Le Feuillerage, route de Coppet, COMMUGNY Nr GENEVA	Ħ	76.14.00	English Law in general/ Wills/Testamentary dis- positions.
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(	Me Bernard KRAYENBUEHL, 7 av. du Théâtre	11	20.37.37	Building Rights/ Divorce/Marriage/ Family Rights.
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1	Me Marc CHESSEX, 3 rue du Théâtre	(021)	62.44.12	Notarial.)
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	Me Roger ROGNON, 26 Grand Rue	it	61.21.74	Notarial.
	Me Alfred VOGELSANG, 8 rue de la Paix	н	61.44.44	Financial Matters, Residence permits,

#### VEVEY

Me Jean-David DENEREAZ, 29 av.
Général Guisan (021) 51.90.58 Notarial.

Me Bernard PFEIFFER, 1 rue de la Clergère "51.12.41 Real Estate.

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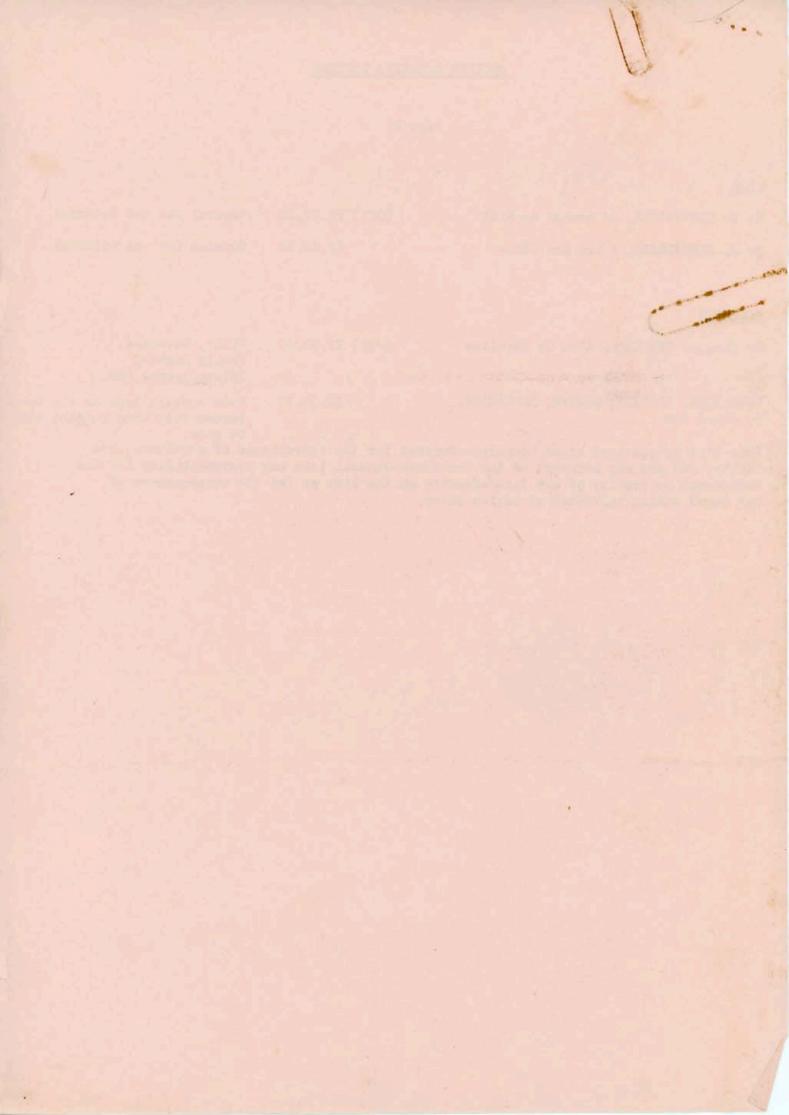
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Page 2

SION

Me E. TAUGWALDER, 14 avenue du Midi	(027) 22.22.22	General Law and Notarial.
Me J. ZIMMERMANN, 5 rue des Cèdres	" 22.20.20	General Law and Notarial.
FRIBOURG		
Me Jacques THIEMARD, 6 bd de Pérolles	(037) 22.90.60	Wills, Divorces, Family Rights, International Law.
MMes LENZ, SCHLUEP, BRINER, DE COULON, 56 Grand Rue	" 22.97.17	Same specialities as the Geneva bureau with whom contact should be made.

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Income Tax

### Canton de Vaud

# Impôt spécial dû par les étrangers

1981

Durée de l'assujettissement: 207 jours (lorsqu'elle est inférieure à une année)

Commune: LA TOUR-DE-PEILZ

Bordereau expédié le	No de référence
10.9.1981	226.626/Etr

30070-1							Montant <del>debu de</del>
Revenu calculé	Elémei	nts bruts		Impôts		A déduire:	montant 200 30
sur la dépense	Revenu	Fortune	COMMUNE	CANTON	Total	impôt anticipé	
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No de référence 226.626/Etr M., Mme, Mlle Succession de BRUNTON Paul p.a. M. André Gfeller Société de Banque Suisse Recette de district 1800 Vevey MONTREUX 1820 Cour-au-Chantre Ch. post. 18 - 5 Tél. (021) 51 04 31

348.10 à déduire impôt défense nationale : Net à payer à la poste ou à la Recette . . Perçu en trop remboursé par poste .

Net à payer à la poste ou à la recette - CR Net à rembourser par poste

225.067.40

RECETTE DE L'ÉTAT VEVEY 1 0 SEP. 1981 ACQUITTE

Délai de paiement : 30 jours dès l'échéance.

Intérêt de retard légal réservé dès la fin du délai de paiement.

Recours: Lorsque la décision de taxation n'a pas fait l'objet d'une notification spéciale, le présent bordereau vaut comme notification et ouvre la voie d'un recours contre la taxation. Le contribuable peut légalement recourir contre les décisions prises par l'autorité de perception (erreurs de calcula, de report, etc.).Les recours doivent être motivés et adressés à la Commission d'impôt de district, dans les

Récépissé	A conserver s. v. p.
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auf Konto au compte 18 - 5

Recette de district Vevey

> Für die Poststelle: Pour l'office de poste: Per l'ufficio postale:

#### IMPOT FÉDÉRAL **POUR LA DÉFENSE NATIONALE** 2le

Notification de la taxation et invitation au paiement

Personnes physiques

Commune: LA TOUR-DE-PEILZ

Canton de Vaud

période 1981-1982

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Recette de district

1800 Vevey

Cour-au-Chantre

Ch. post. 18 - 5

Tél. (021) 51 04 31

Montant déterminant pour fixer le taux 1	● Taux ¹ %	Montant imposable <sup>2</sup>	Impôt pour 1 année	jours <sup>8</sup>	• Impôt 1981 payable jusqu'au 30 jours	jours <sup>9</sup>	• Impôt 1982 - payable jusqu'au	Total pour les 2 années
		37'700	605.40 -	207	348.10.			348.10 .

No de référence : 226.626/Etr

Bordereau expédié le :

10.9.1981

226.626/Etr No de référence M., Mme, Mile Succession de BRUNTON Paul p.a. M. André Gfeller Société de Banque Suisse MONTREUX 1820

Motif de la taxation (lorsqu'elle s'écarte de la déclaration):

Montant total:

à déduire excédent impôt anticipé

348.10

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solde à payer :

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Nous vous invitons à payer le montant ci-dessus dans le délai indiqué.

Si l'impôt est payé après ce délai, il sera majoré d'un intérêt de 5% l'an.

Commission d'impôt de district

226.974.10

Empfangschein 1 Récépissé Ricevuta

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Impôt fédéral pour la défense nationale période

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RECETTE DE L'ÉTAT VEVEY 1 0 SEP. 1981 · ACQUITTÉ

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Recette de district

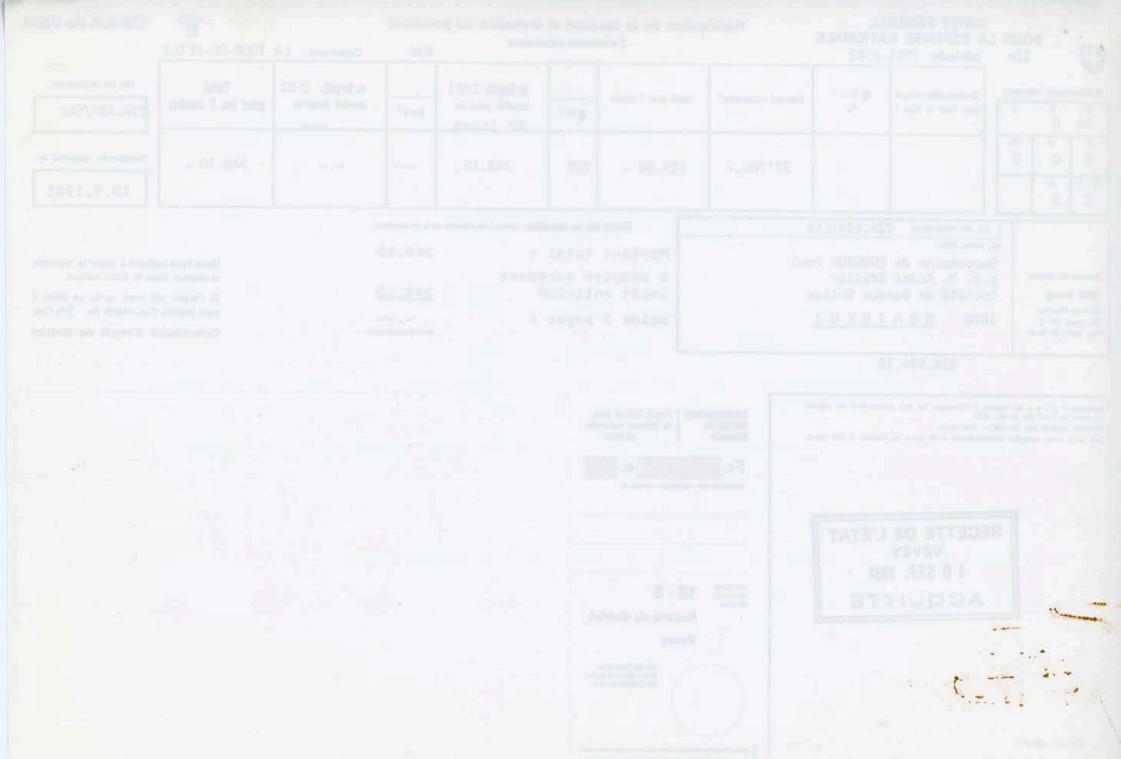
Vevey

Für die Poststelle: Pour l'office de poste : Per l'ufficio postale:

<sup>1</sup> Seulement s'il y a du revenu à l'étranger ou des prestations en capital au sens de l'art. 40, 2e al., AIN.

<sup>\*</sup> Montant arrondi aux Fr. 100.- inférieurs.

Les mois sont comptés uniformément à 30 jours et l'année à 360 jours.





La Tour de Peilz

le: 21.9.79

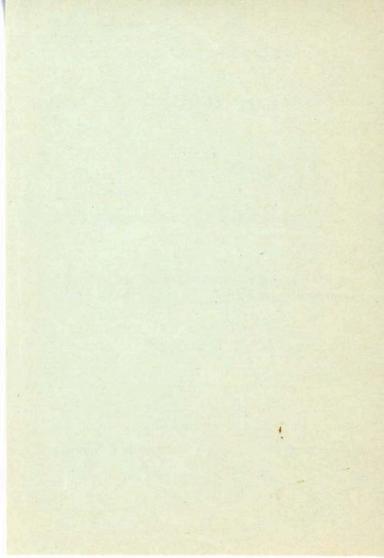
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#### COMMUNE DE LA TOUR DE PEILZ

### QUITTANCE No 6690

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Pour la Commune :



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A000001\* ZV R 2955

G5-522,739.5

S.FR.

AMOUNT

44.00

90 .--

1820 MONTREUX

2.03.81

SAVINGS ACCOUNT

DEBIT ADVICE

RZGE

WE HAVE DEBITED YOUR ACCOUNT AS FOLLOWS:

DR PAUL BRUNTON

AVENUE DES ALPES 107 1814 LA TOUR-DE-PEILZ

CHARGE FOR TAX STATEM. DEPOSIT-NO 522739

Charges for various photocopies and filling up the tax return 1981/82

DEBIT

VAL

2.03.81

FORM WITHOUT SIGNATURE



FORM KITHOUT SIGNATURE

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## Récépissé de dépôt

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Le soussigné,

Marc Chessex

notaire à

Montreux

déclare avoir reçu en dépôt les dispositions de dernières volontés de

Monsieur Paul Brunton, Montreux

le

29 février 1972

En cas de décès, envoyer immédiatement le présent récépissé au notaire susdésigné, après avoir rempli les rubriques ci-après :

Lieu du décès :	Date du décès :
Domicile du défunt :	
Nom et adresse d'un des héritiers :	

# Récépissé de dépôt

Le soussigné,

Marc Chessex

notaire à

Montreux

déclare avoir reçu en dépôt les dispositions de dernières volontés de

Monsieur Paul Brunton

le 29 mars 1973

En cas de décès, envoyer immédiatement le présent récépissé au notaire susdésigné, après avoir rempli les rubriques ci-après :

rempli les rubriques ci-après :

Lieu du décès : Date du décès :

Domicile du défunt :

Nom et adresse d'un des héritiers :

Cu mos mugo MARC CHESSEX, NOTAIRE RUE DU THÉATRE 3 1820 MONTREUX (021) 62 44 12 M. Chassex 1) Give Rassport + Livrer (give KH receipt) 2) KH notify UK + USA consulates 3) Safe doposis key to Bank

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# [¶15,501] INTRODUCING THE U.S. ESTATE AND GIFT TAXATION OF NONRESIDENT ALIENS

By Richard J. Bushelon, Assistant Vice President, United States Trust Company of New York, New York City.

It's an old saying that "Nothing is certain but death and taxes." And most people have learned that the transfer of property at death is subject to tax. But there are different rules for U.S. citizen or resident estates and non-U.S. citizen, nonresident estates.

A U.S. citizen or resident is generally subject to U.S. estate tax on all the property he owns at death, wherever located. A nonresident alien is generally subject to U.S. estate tax only on his U.S. property. For income tax purposes, an alien's residence is the controlling factor, but for estate tax purposes, domicile is the key. So the alien who is temporarily in the United States isn't automatically subject to U.S. estate tax if he should die during his stay here. He must do something more than merely be physically present in the United States to become a domiciliary. And since there is a special U.S. estate tax form, rate, and method of figuring the tax for NRAs, it makes a major financial difference what conclusion is reached regarding a decedent's domicile.

The same question of domicile must be answered for gift tax purposes. The NRA is subject to gift tax only on U.S. property.

[¶15,501.1]

#### DOMICILE

#### (1) General Rule

The estate tax Regulations divide decedents into two categories; residents or citizens and nonresidents not citizens. A nonresident decedent is one who, at the time of his death, wasn't a U.S. citizen and had his domicile outside the United States.<sup>3</sup>

#### (2) Residents in U.S. Possessions

A U.S. citizen living in a U.S. possession at the time of his death is considered an NRA if U.S. citizenship was acquired solely because he was a citizen of the possession, or because he was born or lived in the possession.<sup>4</sup> You have to be careful in these cases because special credit rules apply.<sup>5</sup>

#### (3) Expatriates

The estate of an NRA dying within 10 years after loss of U.S. citizenship will be taxed at the same rate as the estate of a U.S. citizen unless the executor can prove that the avoidance of U.S. taxes was not one of the principal purposes for the loss of citizenship.<sup>6</sup> This provision doesn't apply to persons who lose their U.S. citizenship for other reasons, such as dual citizenship.<sup>7</sup>

As with NRAs generally, only U.S. property owned by the expatriate at the date of death is included in his gross estate. His U.S. tax base, however, is broadened in certain respects.

Ownership tests: For the special provision to apply, the expatriate must have met the following ownership tests at the time of death:

- The expatriate owned (directly or through a foreign corporation, partnership, trust, or estate) 10 percent or more of the total combined voting power of all classes of stock entitled to vote in the foreign corporation, and
- The expatriate owned (directly or constructively through family members) more than 50 percent of the total combined voting power if all classes of stock entitled to vote in the foreign corporation.<sup>9</sup>

The same shares of stock may not be counted more than once in determining whether the 50 percent test has been met.

In addition, in determining whether the tests are met, and the portion of U.S. property owned by the foreign corporation, the expatriate is treated as owning the stock of a foreign corporation (at the time of his death) that he transferred during his life if the transfer, under U.S. estate tax law, isn't effective in excluding property from a gross estate.<sup>10</sup>

**SECTION SET UP:** The estates of NRA expatriates taxed under this special provision are entitled not only to credits for state death taxes, gift taxes, and taxes on prior transfers, but also to a unified credit of  $$13,000.^{11}$ 

#### [¶15,501.2] FIGURING GROSS ESTATE

An NRA's gross estate consists of that portion of the entire gross estate (determined in the same manner as for a U.S. citizen)<sup>12</sup> that is situated in any of the States or the District of Columbia.<sup>13</sup> The executor or the legal representative of the estate must therefore concern himself not only with property owned outright, but also with transfers in contemplation of death, powers of appointment, joint interests, and all the other considerations usually given a domestic estate.

Obviously, to arrive at the taxable estate, you must determine which of those assets making up the entire gross estate are situated in the United States. If the general situs rules for property always applied, the task would be simple. However, this is not the case. In special situations, the Code and Regulations provide specific rules, while many estate tax treaties set up different ones. So in some cases, no easy answer is available.

#### (1) U.S. Property

Unless an applicable estate tax treaty contains a contrary provision, the following assets are considered to be located in the United States, subjecting them to U.S. estate tax.

- Stock of a domestic corporation, regardless of the physical location of the certificates.<sup>14</sup>
- Debt obligations of a domestic corporation, the United States, a State or political subdivision thereof, the District of Columbia, or any other U.S. person.<sup>15</sup>

- Real property located in the United States.<sup>17</sup>
- Tangible personal property physically located in the United States.<sup>18</sup>
  - >>>> EXCEPTION → The personal property of an NRA who dies while in the United States on a trip is not subject to U.S. estate tax. 19

Property transferred before death: If within three years of death, the NRA transferred property located in the United States at the time of the transfer or at the time of death, the property is considered located in the United States for estate tax purposes. Property that the NRA transferred at any time before death that is includable in the gross estate is considered located in the United States if it was so located either at the time of the transfer or at the time of death. These transfers include a transfer with a retained life estate, 1 a transfer with a reversionary interest, 2 and a revocable transfer.

Some other property interests have been considered located in the United States by the Revenue Service in addition to those specifically listed in the Code.

Partnership interest: A partnership interest in a partnership whose business is carried on in the United States is considered U.S. property. If the partnership's business is carried on partly in the United States and partly abroad, it would seem logical that only the NRA partner's share of the U.S. business should be included in his U.S. estate. But the Revenue Service has ruled that the deceased NRA partner's total interest is taxable, with no consideration given to the underlying assets. The fact that some of the partnership's assets are foreign property would not reduce the taxable interest. This result could lead to double taxation unless a treaty provided otherwise. However, the Revenue Service's position has been neither challenged nor cited yet.

Revocable trusts: A revocable trust with U.S. property as the trust assets is considered U.S. property. On the theory that the grantor of a revocable trust owns the assets, the Revenue Service says that you must look to each of the underlying assets. This, as you can see, differs from the entity theory applied to partnership interests. If the trust contains both U.S. and foreign property, only the U.S. property is includable in the NRA's estate. That the trust property is held in the United States and is administered by a U.S. trustee does not change the result. If the NRA owns only a partial interest in a U.S. trust, it would seem logical that the same rule should apply. So the interest should be included only to the extent of the percentage of ownership.

Income interests in trusts: An income interest in a trust should probably be included to the extent there is income from U.S. property<sup>26</sup> (although this point isn't definitely settled). This is an extension of the rule that you determine the amount of includable trust interest by looking to the location of the underlying assets.

**>>>> QUERY** → What if the trust is a foreign trust? The result should be the same. As of the time of writing, however, there is no answer.

Power of appointment: U.S. property over which the NRA had a general power of appointment at death, or over which the NRA exercised or released the general power

of appointment during his life, is includable in the gross estate. A general power of appointment means that the decedent must have had a power exercisable in favor of himself, his estate, his creditors, or the creditors of his estate.<sup>27</sup>

#### (2) Non-U.S. Property

The following items are not considered to be located in the United States and therefore are not subject to U.S. estate tax:

- Stock issued by a non-U.S. corporation, regardless of the location of the certificates. 28
  - Real property not located in the United States. 29
- Debt obligations of all foreign obligors. In addition, a debt obligation of a U.S. corporation that has realized less than 20 percent of its gross income from U.S. sources during the three-year period before the NRA's death is treated as foreign property. 30
- Tangible personal property located outside the United States. In addition, works
  of art physically in the United States because they were imported or lent for exhibition purposes are treated as foreign property.<sup>31</sup>
- Insurance proceeds on the life of an NRA decedent, even if paid by a U.S. insurance company.<sup>32</sup>

Bank deposits. Deposits in a U.S. bank or savings and loan not connected with a U.S. trade or business are considered non-U.S. property. A deposit with an insurance company under an agreement to pay interest on it is also non-U.S. property, as is a deposit with the foreign branch of a U.S. bank. But deposits in the U.S. branch of a foreign bank are included in the NRA's estate.<sup>33</sup>

While the list isn't all inclusive, it does give you an idea of some of the problems to consider. Obviously, the most important determination to be made is the location of the property in the estate. Unless certain deductions are claimed, information is specifically requested, or the NRA is an expatriate for whom special rules apply, only U.S. property need be listed on the return.<sup>34</sup>

#### [¶15,501.3]

Tavable estate

#### ESTATE TAX

#### (1) Rates

The Code provides special tax rates for NRA estates.<sup>35</sup> Though an NRA's estate is computed differently from a resident's taxable estate, the tax imposed on the NRA is lower. Here are the rates:

Taxable estate	Tax equals
Not over \$100,000	6% of such amount
Over \$100,000, but not over \$500,000	\$6,000 plus 12% of amount over \$100,000
Over \$500,000 but not over \$100,000,000	\$54,000 plus 18% of amount over \$500,000
Over \$1,000,000 but not over \$2,000,000	\$144,000 plus 24% of amount over \$1,000,000
Over \$2,000,000	\$384,000 plus 30% of amount over \$2,000,000

#### (2) Deductions

An NRA estate is entitled to deductions for administration expenses, debts, taxes, casualty losses, and bequests to a U.S. charity.<sup>36</sup> No marital deduction is allowed, however, except for the estates of French domiciliaries.<sup>37</sup> The deductions are allowed even if the expenses were not incurred in the United States. But before any of these deductions can be taken, the value of the entire gross estate (wherever situated) must be revealed. While the full charitable deduction may be taken, the other expenses can be deducted only to a limited extent using this formula:<sup>38</sup>

Gross estate in United States
Total gross estate wherever situated × Expenses = Deduction

#### (3) Unified Credit

A \$3,600 credit against the estate tax is provided for an NRA's U.S. estate.<sup>39</sup> This credit is applied after figuring the tentative estate tax less the tax on lifetime gifts made by the NRA.

A special rule applies to the estates of citizens of U.S. possessions that are treated as NRA estates.<sup>40</sup> The estates of such individuals may qualify for a credit that is the *greater* of:

- \$3,600, or
- \$13,388 multiplied by the ratio that the value, at death, of the decedent's U.S. estate bears to the entire value of the decedent's world-wide gross estate.<sup>41</sup>

In no case may the credit exceed the amount of the estate tax.

#### (4) Other Credits

No credit is allowed for foreign death taxes. The credits for state death taxes, U.S. gift taxes, and the U.S. estate tax paid on prior transfers of property, which are included in the decedent's estate, are allowed.<sup>42</sup> The credit for state taxes cannot exceed a fraction of the amount available to U.S. citizens, computed from Table C, Form 706. Here is the fraction:<sup>43</sup>

Value of property on which state taxes were paid

Value of gross estate situated in the United States

#### (5) Valuation

As with the estate of a U.S. citizen, an NRA estate is valued as of the date of death. An alternate valuation date may be elected. 44 If it is necessary to include the value of foreign property (because deductions are claimed), the same valuation date for all estate property wherever located must be used. If the alternate valuation date is elected, any property disposed of within six months of the NRA's death must be valued as of the date of disposition. Any property not disposed of within six months of the NRA's death must be valued as of the date which is six months after the date of the NRA's death. 45

#### (6) Estate Tax Return

The personal representative must file Form 706NA with payment of the tax within nine months after the decedent's death if the value of U.S. property exceeds \$60,000.<sup>46</sup> The return and payment should be submitted to the Internal Revenue Service Center, Philadelphia, Pa. 19255.

11-12-80

#### [¶15,501.4]

#### TREATY EFFECTS

The primary purpose of treaties is to eliminate, where practical, the double taxation that would result from taxing the same estate or gift transaction because of overlapping taxing jurisdiction.

>>>> NOTE -> Tax treaties take precedence over the Code itself. 47 Should you find, however, that the general Code rules produce a more beneficial result, the treaty rules shouldn't be used—but you can't mix the rules.

Current treaties: Listed below are the countries with which the United States has an estate tax treaty. The provisions are applicable for decedents dying on or after the date indicated.<sup>48</sup>

Country	Effective Date	Notes
Australia	1/7/54	1,2
Canada	1/1/59	
Finland	12/18/52	1
France	10/1/80	1, 3, 4
Greece	12/30/53	1,5
Ireland	12/20/51	
Italy	10/26/56	Desilva Xe1. Lt.
Japan	4/1/55	
Netherlands	2/3/71	
Norway	12/11/51	1
Switzerland	9/17/52	1,2
Republic of South Africa	7/15/52	o credit is allowed
United Kingdom	11/11/79	
	The state of the s	

Belgium-Negotiations concluded, ratified by Senate, but not yet effective.

<sup>(1)</sup> Noncitizens of the United States who died *resident* in these countries were entitled to the pre-Tax Reform Act \$30,000 exemption or, if higher, the following:

Value of property with a U.S. situs	6000	\$60,000
Value of all property wherever situated	×	\$60,000

Now that there are no flat exemptions, but only credits, it is logical to assume that for decedents dying after December 31, 1976, either the \$3,600 credit or a proportionate part of the credit available to citizens and residents can be taken.

- (2) Citizens of these countries may claim same exemption as in (1) regardless of residence at time of death (as long as not in the United States).
  - (3) Provides for a marital deduction.
- (4) Allow a share (U.S. situs property ÷ total estate) of all deductions (i.e. gifts to foreign charities) allowed a U.S. citizen.
  - (5) Same as (4), except that the marital deduction is specifically excluded.

#### [¶15,501.5]

#### FORM 706 NA

Here is a filled-out Form 706NA based on the following-

**Example:** Jose Manuel, a nonresident alien, died in Madrid on May 1, 1980. At the time of his death, he owned the following:

10 Acres of undeveloped Real Estate in Rockland County, New York An investment management account of which the underlying assets are:

1,000 shares A Corp. (U.S. corporation) 500 shares B Corp. (U.S. corporation)

b We for	o6NA (Rev. 1-79)  If the decedent die testate?  If the decedent die testate?  If the estate?	Yes X X	No	7 Did the decedent m without an adequat or money's worth, it the United States e the time of the dece if "Yes," attach Scr 8 Were there in existe	e and full cons any part of whi other at the tin edent's death? hedule G from f ence at the time	ideration ch was s se of tra- form 706	in money situated in risfer or at 5. decedent's	Yes	X
a Rei b Sto c Del the	If the decedent, at the time of death, own any— all property located in the United States?	X	<u>x</u>	death any trusts cre time, any part of the in the United States or at the time of the II "Yes," attach Sch 9a Did the decedent, at eral power of appor which was situated if If "Yes," attach Sch	ne property of a either when the e decedent's de nedule G from F t the time of de- intment over pr in the United St.	which was e trust w eath? . form 706 ath, poss operty a ates? .	is situated as created is sess a gen- ny part of	10.25 10.25	_x
3 Wa Sta 4 Did thr the	is the decedent engaged in business in the United stes at date of death? If the decedent at date of death personally or ough an agent have access to a safe deposit box in United States? If the time of death, own any prop-		x	b Or, at any time, exer If "Yes," attach Sch A general power of an appointment exercisable decedent's estate, the often of the tors of the decedent's e- beneficiary to appropria	rcise or release nedule H from F opointment me le in favor of decedent's cred estate, and incli ate or consume	the power orm 706 ans any the dece itors, or udes the the prin	power of edent, the the credi- right of a scipal of a		_ X
ert rigi wit	y situated in the United States as a joint tenant with hit of survivorship or as a tenant by the entirety or th surviving Spouse as community property?		x x	trust. For complete del Code.  10a Have Federal gift ti b Period(s) covered c Internal Revenue o	ax returns ever	been file			X
	u elect to have the gross estate of the decedent vi id by section 2032 of the Internal Revenue Code?	-	at a		A			Yes X	
his e d) sho (a) Item	lection cannot be exercised unless it is shown on ould not be furnished unless the reply to this question (b) Complete description of property and sto	on is "		(c) Alternate	(d) Alternate v	alue in	(Value at d		deat
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(a) she (b) she (c) sh	could not be furnished unless the reply to this questic  (b)  Complete description of property and sto  CUSIP number if available  1,000 shares A Corp., common, no \$100 unit value, N.Y. Stock Excl  500 shares B Corp., common, \$10 ; \$90 unit value, N.Y. Stock Exch  \$50,000 - New York State, Y%, 20- due 1985. Interest payable quar  Jan. 1, Apr. 1, July 1, and Oct.  Stock Exchange  10 acres undeveloped land, Route  Spring Valley, Rockland County, 1  (if more space is needed, attach additional	par hange par, ange par, a	r boolly of N.Y.	(c) Alternate valuation date  11/1/80  11/1/80  11/1/80  11/1/80  d  9/1/80  d  submitted, deduction on I	45 42 42 42 42 45 46 47 48 48 48 48 48 48 48 48 48 48 48 48 48	alue in s dollars , 000 , 000 , 000 , 000 , 000	Value at din United \$ \$140, 44, 40, 100, \$324, \$ 28, 71, 1,000, 60	,000 ,000 ,000 ,000	deat dolla

Detach at perforation and file only pages 1 and 2.

Page 3

#### Instructions

(Refc. ences are to the Internal Revenue Code, unless otherwise noted.)

General.—The United States estate tax is imposed by chapter 11 on the transfer of the taxable estate of the decedent and not on the receipt of any particular legacy, devise, or dis-tributive share.

receipt of any particular legacy, devise, or distributive share.

The first step in computing the tax liability for a nonresident not a citizen of the United States is an enteresident not a citizen of the United States is used. The second step is to determine the part of the gross estate situated in the United States, which must be itemized in Schedule A. The third of the gross estate situated in the United States, which must be itemized in Schedule A. The third set is to determine the amount of the deductions authorized, which should be entered on Schedule estate situated in the United States in order to determine the taxable estate. The fourth step is to compute the tax and any allowable credit in general, the estate tax is determined by applying the compute the tax and any allowable credit in general, the estate tax is determined by applying the interest of the compute the tax and any allowable credit in general, the estate tax is determined by applying the compute the tax and any allowable credit on an attached Schedule G (Form 706). Transfers doring the other than the gross estate are reported on an attached Schedule G (Form 706). Transfers doring like other than these includible in the gross estate in the computer of the credit of interest properties of the credit applicable for the year of the decedent's celest. Enter the amount of the credit on line 7, page 1.

of the credit on line 7, page 1.

The references to the deceased person's residence generally mean the deceased person's dominicial, and the expression nonmesident not a citizen of the United States refers to a decedent who at the time of death was neither demicided in nor a citizen of the United States and to a decedent who acquired United States (citizenship solely by reason of the decedent's connection with a United States passion.

States possession. For purpose of this form, personal representative means the executor, executin, administrative means the executor, executing sealed, if no executing executing, administrative means to executing exe

Information concerning transfer certificates for United States assets may be obtained by writing to Director of International Operations, P.O. Box 896, Benjamin Franklin Station, Washington, D.C. 20044.

20044.

2. Who must file.—The personal representative must file form 706NA for the estate of a non-resident not a citizen of the United States if the must file form 706NA for the estates if the state of the 10 file o

3. When and where to file.—File Form 706NA within 9 months after the date of the decedent's death unless an extension of time to file has been granted. If an extension has been granted, attach a copy of Form 476B. Please mail the return to the internal Revenue Service Center, Philadelpha, PA 19255.

4. Payment of tax.—Pay the tax within 9 months after the date of the decedent's death unless an extension of time for payment has been granted. Make check or money order payable to the literial Revenue Service and collectible in U.S. the literial Revenue Service and collectible in U.S. change or other charges and decident for exchange or other charges and collectible of the charge or other charges and the charge or other charges and the charge or other charges are considered to the charge of the charges are charged to the charge of the charges are considered to the charge of the charges are charged to the charge of the charges are charged to the charge of the charges are charged to the charge of the charge

sued before March 4, 1971) have been redeemed at par plus accrued interest in payment of the tax any Federal Reserve bank, the office of the Ireasurer of the United States, or the Bureau of Public Debt, as explained in Rev. Proc. 69–19, internal Revenue Cumulative Bulletin 1969–2, page 300, attach a Statement to Form 706Ah to include these facts. If an extension of time to pay has been granted, attach a copy of Form 47CB.

been granted, atton a copy or form 476.

5. Penalites.—Section 6651 provides for additions to the tax for both delinquent returns and for delinquent payments of tax unless due to reasonable cause. The law also provides penalites for wildful failure to make and file a return on time and for willful failure to make and file a return on time and for willful failure to revade or defeat payment.

of task.
6. Entire gross estate wherever situated.—The entire gross estate wherever situated for a non-time gross estate wherever situated for a non-time gross estate of a citizen or resident and includes all property brenticially owned by the decedent. The following are examples of the various property interests which are includible.

are examples of the various property interests which are includible.

(a) All property owned by decedent at time of death either as a joint tenant with right of survivorship or as a tenant by the entirety. The full value can be as a tenant by the entirety. The full value exists a state of the control of t

(e) Several classes of transfers made by the decedent prior to death, without an adequate and full consideration in money or money's worth.

(f) Property in which the decedent (1) possessed a general power of appointment at time of death or (2) exercised or released (in a specified manner) the general power of appointment during the decedent's lifetime. decedent's interme.

(g) Certain annuities received by a beneficiary by reason of surviving the decedent. For additional information concerning annuities, life insurance, transfers during life, and general powers of appointment, see the Estate Tax Regulations and the instructions for Form 706.

Jations and the instructions for form 706.

7. Property situated in the United States.—The part of the gross estate situated within the United States are stated in the United States.—The part of the gross estate situated within the United States. When used in a geographic form of the United States are states and the District of Columbia. Prophyty transferred during the decelerats lists, and includible in the entire gross estate wherever situated, is deemed situated within the United States of the property was so situated of death. The time of the transfer of at the time of death, the time of the transfer of at the time of each the time of the transfer of at the time of property is stuated in the United States.

(a) Real estate and tangible personal property are within the U.S. if Physically located in the United States.

someon states.

(b) Irrespective of where the stock certificates are physically located, (1) stocks of corporations organized in or under the laws of the U.S. constitute property within the U.S., and (2) stocks of all other corporations constitute property outside the U.S.

side the U.S. (c) Debt obligations (not otherwise covered in paragraph (e)) of (1) a linited Stares person (see section 790 (a)(30)), or (2) the United State or any political subdivision or the District of Columbia, are deemed properly within the United States, whether on not the written evidence

is treated as being the property itself. However, if the United \* ates person is a domestic corporation, the die-in-obligation may quality for treatment as property deemed situated outside the United States if the interest on the obligation, had it States if the interest of the obligation, had in which we have been treated as to me of death, would have been treated set at the obligation without the United States by reason of sections 851(a)(1)(8), 861(a)(1)(6), or 861(a)(1)(1)(1) refers to demestic corporations with less than 20% of gross income from sources within the United States for the 3 taxable years within the United States for the 3 taxable years within the United States for the 3 taxable years within the United States for the 3 taxable years within the United States for the 3 taxable years within the United States for the 3 taxable years depth of the states of th

(d) Proceeds of insurance policies on the life of a decedent who was neither a citizen nor a resident of the United States as of the date of death are not situated in the United States.

death are not situated in the United States.

(a) Amounts not effectively connected with the conduct or a trade or business within the United States by the decedent (1) deposited with domentic persons carrying on the banking business (including a domestic banking branch of a foreign corporation), (2) deposited with a domestic savings, and loan or similar association covered by section 591, or (3) held by a domestic insurance company, under an agreement to pay interest, company under an agreement to pay interest, become properly without the United States. Depositions or domestic partnership, branch is engaged in the commercial banking business, are deemed property without the United States.

(9) For situs of works of art, owned by a non-

(f) For situs of works of art, owned by a non-resident not a citizen of the U.S., which were imported into the U.S. for exhibition purposes, see section 2.05(c).

8. Death duty conventions are in effect will each of the countries listed below. The provision of a convention apply in the case of a deceder dying on or after the effective date shown.

Country	Effective Date
Australia	January 7, 1954
*Canada	January 1, 1959
Finland	December 18, 1952
France	October 17, 1949
Greece	December 30, 1953
Ireland	December 20, 1951
Italy	October 26, 1956
Japan	April 1, 1955
Netherlands	February 3, 1971
Norway	December 11, 1951
Switzerland	September 17, 1952
Union of South Africa	July 15, 1952
United Kingdom	July 25, 1946

sates of decedents dying on or after January 1, 1972.

9. Property description.—Describe the property itemzed in Schedule A in sufficient detail to enable the Internal Revenue Service to identify it. Description of stocks must include number it. Description of stocks must include the property of the stocks of t

(Cuntinued on page 4)

263-209-1

Form 706NA (Rev. 1-79)

#### Instructions (Continued)

joint interest as defined in sections 2040(b) and 2040(d) of the Code was created within 3 years of death (and after December 31, 1976), report the qualified joint interest on Part A of Schedule G-from Form 706, rather than on Schedule A to facilitate the inclusion of the gift tax in the gross

facilitate the inclusion of the gift tax in the gross estate.

10. Property valuation date—Unless the election is properly made at the time the return is timely field to adopt the alternate valuation authorized to the state of the decedent's death. In this case the information indicated by the columns of Schedule A headed "Alternate valuation adate" and "Alternate value in U.S. dollars" need not achieve and the space in U.S. dollars" need not shown, and the space in U.S. dollars" need not shown, and the space in these columns may be if the person filling the return elects the valuation authorized by section 2032, the election must be expressly indicated in the space provided under Schedule A, and the return must be timely filed. If the election is made, (1) any property of the color of the space of the decedent's death must be valued as of the date of the distribution. Sale: exchange, or other disposition, whichever first occurs, and (2) any property not distributed as a columns of the decedent's death. In the scale all columns of Schedule A must be completed to all property included in the gross estate on the decedent's detection, if exercised, must be applied to all property included in the gross estate on the decedent's death. In the case all columns of Schedule A must be completed.

columns of Schedule A must be completed.

11. Deduction for administration expenses, claims, etc...—Deduct the proportion of the following expenses, claims, etc. that the volue of the part of the prost estate situated in the United wherever studed: (1) furnarial expenses, (2) administration expenses; (3) claims against the estate; (4) unpaid mortgages and other lenses and (5) losses incurred during the settlement of the other casalities, or from them, to the composition of the casalities, or from their, to the most compensated for by insurance or otherwise.

other casualties, or from theft, to the extent not compeniated for by insurance or otherwise. It is immaterial whether the amounts deducted wire incurred or expended within or without the discrete of the control of t

sional proof may be required in specific cases. The total amount of expenses, claims, etc. en-tered on Schedule B, line 4 must be supported by an itemized schedule. The schedule must show the exact nature and amount of each expense or claim and the name of the creditor. Other dedoctions must be fully described and, if relating to particu-lar property the property must be identified. Death far property taxes on recover a time reach, and property taxes on recover and the result and property taxes on recovery.

to any extent deductible. If a claim against the estate or a mortgage is based on a promise or agreement, the amount included on line 4 must be limited to the amount which was contracted to the amount which was contracted to the amount of the state of the consideration in money or money's uses and full consideration in money or money's use of the property undiminished by the amount of indebteness secured by the mortgage is included in the entire gross estate wherever situated. Except as other-deductions entered on 2003, the amount of deductions entered on the contract of the contract of the value of the property included in the entire gross estate wherever situated, which is subject to claims.

to claims.

If a marital deduction is claimed under the United States France Death Tax Convention for the United States France Death Tax Convention for the ast the time of death, including the state of the convention of the shown of the computation of the showout of the marital defluction.

amount of the marital deduction.

12. Charitable deduction—If a charitable deduction is claimed on schedule 8, line 6, attach
schedule 0, from Form 70% 50 separate
schedule 0 from Form 70% 50 separate
charitable deduction may be
claimed only if the transfer was to a domestic
entity or for use within the United States as described in section 2106(a)2. If a charitable deduction is claimed under the United States-France
creece Death Tax Convention the United StatesGreece Death Tax Convention to the United States
decedent who at the time of death was domiciled
in France or Greece or was subject of Greece, attach Schedule 0 from Form 706 together with an
attached sheet showing the computation of the
advanced of the charitable deduction. For the rules
and the charitable deduction, for the rules
are successful to the computation of the
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cont

Code.

13. Unified credit.—Except for section 2107 expatriales and section 2209 residents, the credit \$3,500. section 2107 expatriales, the credit \$13,000. section 2107 expatriales, the credit is \$13,000. United Step 100 expatriales, the credit is \$15,000. United Step 100 expatriales, the credit is the greater of () \$3,600 or (0) or (0)

Date of death					Amo
During 1977					. \$ 8.
During 1978					10.
During 1979					110
During 1980					13.
After 1980					15.

14. Tax computation.—Use the following rate unless the decedent was an "expatriate" within the meaning of section 2107. For "expatriates" use the rates in section 2001 for decedents who were citizens or residents of the United States; these rates may also be found in Table A in the instructions for Form 706.

(A) Taxable estate equaling—	(B) Taxable estate not exceeding—	Tax on amount in column (A)	Hate of tax on excess over amount in column (A)	
\$100,000 500,000 1,000,000	\$100,000 500,000 1,000,000 2,000,000	\$6,000 54,000 144,000	Percent 6 12 18 24	

THE PARTNAMENT PRINTING OFFICE - 1979 17-263-219

- Page 4

  15. Credit for estate, inheritance, legacy, or succession taxes paid to a State, or the District of Columbia.—The States and the District of Columbia.—The States and the District of Columbia.—The States and the District of Columbia generally impose inheritance or other death taxes. If these taxes are paid in respect of properties of the states of the states are paid in respect of properties of the states of the states are paid in respect of properties of the states of the states are the same ratio to the credit computed using Table C in the Instructions for Form 706 based on the Federal district estate ratio to the credit computed using Table State ratio to the credit computed of the property upon which State das the value of the property upon which State das the value of the proper type was included in the gross estate situated in the United States. The credit is also imitted to such taxes as were actually paid and credit claimed to such taxes as were actually paid and credit claimed to such taxes as were actually paid and credit claimed on the states. For allowance of the credit, a certificate of the proper officer of the taxing State, showing the information required by the Estate Tax Regulations, must be submitted. If possible, please file if as soon thereafter as the properties of the appropriate district director within 30 days in accordance with the decedent file of the properties of the properties of the properties of the properties of the de
- thereunder.

  16. Supplemental documents.—If the decedent died testate, a certified copy of the will must be attached to the return, For onselv be attached to the return, For onselv be attached to the return, For onselv be stock of a corporation, attach the belance sheets, stock of a corporation, attach the belance sheets, so and the state of the return of the retu
- gift tax returns filed by decedent.

  17. Former United States citizens.—If the snower to question 6 on page 2, is "Yes." but it is contended that tax avoidance was not one of the principal purposes for the loss of United States citizenship, supplemental documents to sustain the contention should be attached to the return. If the loss of United States citizenship had for one of its principal purposes the avoidance of the state, the special tax computation rules in section tax, the special tax computation rules in section tax, the special tax computation rules in section tax, the special tax computation rules described therein which was sowed or transferred by the decedent may be required to be included in the gross estate if the foreign corporation owned assets situated in the United States.
- 18. Declarations.—If there is more than one personal representative, each must verify and sign the return, if the return is prepared for the personal representative by another, the return must also be signed by the return preparer. Form 2848. Power of Attorney, may be used to author-ize a qualified representative (see 26 C.F.R. 601.502) to represent the personal representative before the internal Revenue Service.
- Publication,—Publication 448, A Guide to Federal Estate and Gift Taxation, which is ex-pected to be available in the early part of 1979, contains additional information.

[¶15,501.6]

#### GIFT TAX

Gifts by NRAs are subject to gift tax if the gift property is located in the United States. The tax applies to real or tangible personal property, whether the transfer is direct or indirect. If the donor acquired U.S. citizenship as a result of birth, residence, or citizenship in a U.S. possession, he is considered an NRA for gift tax purposes. 49

>>> SPECIAL RULES → Gifts of intangible personal property, regardless of location, are not taxed. But if the donor is an expatriate who lost U.S. citizenship for tax avoidance purposes, he is taxed on gifts of intangibles located in the United States. These gifts include stock in a U.S. corporation and debt obligations of a U.S. person. 50

Filing requirements: A gift tax return on Form 709 is required on a quarterly basis only when all taxable gifts made during the quarter plus all other gifts during the year for which no return has been filed exceed \$12,500.51 If all gifts don't exceed \$12,500, a return is required by the fifteenth day of the second month following the close of the fourth calendar quarter of the calendar year-February 15. 1980, for 1979 gifts.

Deductions and exclusions: Deductions are allowed for gifts to U.S. charities or charitable trusts that must use the gift within the United States. The deduction is for

the full value of the gift, with no proration necessary as under the estate tax rules. 52 The marital deduction generally isn't available to NRAs. But if the donor spouse is a U.S. citizen, a marital deduction is allowed.<sup>53</sup> And NRA donors may not avail themselves of gift splitting.54 The annual \$3,000 exclusion (per donee) for the gift of a present interest is available. 55

Treaties: The United States is a party to gift tax treaties with Australia and Japan. Each treaty has rules for determining the location of property. The treaties allow credits for gift taxes paid to each country by citizens, residents, and NRAs of each country.56

#### CONSULT TABLE UNDER THE TAB CARD "CROSS REFERENCE TABLE" FOR OTHER ARTICLES AND NEW DEVELOPMENTS RELATED TO THIS SUBJECT

#### TABLE OF CITATIONS

Listed below are references cited in the preceding analysis.

#### Footnote

#### References

- (1) Reg. Sec. 1.871-2.
- (2) Reg. Sec. 20.0-1(b)(2).
- (3) IRC, Sec. 2101.
- (4) IRC, Secs. 2208; 2209.
- (5) IRC, Sec. 2102(c).
- (6) IRC, Sec. 2107(a).
- (7) Reg. Sec. 20.2107-1(d).
- (8) IRC, Sec. 2107(b).
- (9) IRC, Secs. 958; 2107(b).
- (10) IRC, Secs. 2035-2038.
- (11) IRC, Sec. 2107(c).
- (12) IRC, Secs. 2031-2044.
- (13) Reg. Sec. 20.2103-1.
- (14) IRC, Sec. 2104(a).
- (15) IRC, Sec. 2104(c).
- (16) Reg. Sec. 20.2104-1(a)(4).
- (17) Reg. Sec. 20.2104-1(a)(1).
- (18) Reg. Sec. 20.2104-1(a)(2).
- (19) Delaney v. Murchie (CA-1, 1949), 177 F2d 444, 38 AFTR 792.
- (20) IRC, Sec. 2035.
- (21) IRC, Sec. 2036.
- (22) IRC, Sec. 2037. (23) IRC, Sec. 2038.
- (24) Rev. Rul. 55-701, 1955-2 Cum. Bull. 836.
- (25) Rev. Rul. 55-163, 1955-1 Cum. Bull. 674.
- (26) Commissioner v. Nevius (CCA-2, 1935), 76 F.2d 109, 15 AFTR 401.
- (27) IRC, Sec. 2041(b)(1).
- (28) Reg. Sec. 20.2105-1(f).
- (29) Reg. Sec. 20.2105-1(a)(1).
- (30) IRC, Sec. 2104(c).
- (31) IRC, Sec. 2105(c); Reg. Secs. 20.2105-1(a)(2), (b).
- (32) IRC, Sec. 2105(a); Reg. Sec. 20.2105-1(g).
- (33) IRC, Sec. 2105(b).
- (34) Reg. Sec. 20.2103-1.
- (35) IRC, Sec. 2101(d).
- (36) Reg. Sec. 20.2106-1(a).
- (37) U.S.-France Estate Tax Treaty, Art. 11., P-H Tax Treaties, ¶38,530.
- (38) IRC, Secs. 2053; 2054. Reg. Sec. 20.2106-2.

Strike two: To be creditable, a foreign income tax must be imposed on gain actually realized. The Ontario mining tax allowed the tax to be imposed on unrealized income.

\*\*\*\*\*TEMPORARY REGS \rightarrow Under temporary and proposed Regs issued in November, a foreign charge is an income tax only if it (1) isn't compensation for a specific economic benefit, (2) is based on realized net income, and (3) follows reasonable rules of the taxing jurisdiction [T.D. 7739, 11-17-80]. The standard for determining whether a foreign charge is an income tax is still the U.S. income tax, so apparently the result for Inland Steel would be the same.

# FIGURING THE ESTATE TAX DEDUCTION FOR FOREIGN CLAIMS AND EXPENSES

[¶ 5.3] Filing an estate tax return can be a long, complicated process for the executor, especially if the estate includes foreign property. For one thing, you have to convert foreign administration expenses and claims against the estate into U.S. dollars. Recently, the IRS ruled on what exchange rate to use [Rev. Rul. 80-260, IRB 1980-39]. Take this—

Example: Isabela Lopez, a U.S. citizen, died in New York City on September 27, 1980. Her estate included a house on the Costa del Sol, Spain, worth 65 million pesetas, subject to a mortgage of 35 million pesetas. The executor was billed 100,000 pesetas for attorney's fees to settle the estate in Spain.

Administration expenses: The amount allowable is the amount actually paid by the estate [Sec. 2053(a)]. You must use the exchange rate in effect on the date the attorney's fees are paid to figure the dollar amount of the deduction. Say the payment was made on February 19, 1981, and the exchange rate was \$0.0115/peseta. The administration expense deduction would be \$1,150 (100,000 pesetas × \$0.0115 = \$1,150).

The estate tax return is due nine months after the date of death—here, June 27, 1981. In special circumstances, the executor can get an extension of up to six months [Sec. 6081]. If the attorney's fees aren't paid by the date of the return, you can estimate the deduction using the then current rate. If the rate changes between the date of the return and the actual payment date, you must notify the IRS for a recomputation of the estate tax due [Reg. Sec. 20.2053-1(b)(3)].

Claims against the estate: Generally, a claim against the estate is valued as of the date of death. So you use the exchange rate in effect on that date to figure the dollar amount of the claim and deduction. You can choose an alternate valuation date—that is, up to six months after death [Sec. 2032]. In that case, you use the rate in effect on that date.

How to figure it: On September 27, 1980, the mortgage balance on the house in Spain was 35 million pesetas. First, you find the exchange rate for pesetas to dollars on September 27, 1980—assume 0.0115/peseta. Then you multiply the mortgage balance by that rate to find the dollar figure (35 million pesetas  $\times$  0.0115 = 402,500).

**>>>** ENGLISH REQUIRED → Remember, if any backup documents to be filed aren't in English, you must provide an English translation. You file the original document and translation with the estate tax return [Form 706, Instructions].

#### G-4 VISA DOESN'T ALWAYS DECIDE TAX STATUS

[¶5.4] An officer or an employee of an international organization such as the United Nations is usually classified as a nonimmigrant alien and given a G-4 visa [Immigration and Nationality Act, 8 USCA 1101(15)]. For income tax purposes, the person with a G-4 visa is considered a non-resident alien. The IRS has recently ruled that, for estate tax purposes, that person will be considered a U.S. resident if he intended to stay in the United States indefinitely [Rev. Rul. 80-363, IRB 1980-52, revoking Rev. Rul. 74-364, 1974-2 Cum. Bull. 321].

Why resident status? While a nonresident estate is taxed only on its U.S. property and a resident estate is taxed on its worldwide property, resident status may be better in some cases. The nonresident estate can't take advantage of benefits such as the marital deduction, gift tax credit, or gift-splitting provisions.

Let's see what happened to one taxpayer's estate.

Facts: Pablo Domingo, a Venezuelan citizen, worked for an international organization until his death in 1978. In 1765, Domingo moved to the United States on a G-4 visa. He had decided to stay in the United States indefinitely and had not changed his mind before his death.

For Domingo's estate to be taxed at U.S. resident rates, he had to have a U.S. domicile at the time of his death. You acquire a domicile by living in a place with no present intention of moving. Residence without the necessary intention to stay won't be enough for domicile [Reg. Sec. 20.0-1(b)].

Earlier ruling: In Revenue Ruling 74-364, the IRS had resolved the question of resident/nonresident estate on the basis of immigration law. There, a French citizen who worked for an international organization in Washington, D.C., had entered the United States on a G-4 visa as a non-immigrant alien. Immigration law regulations require a nonimmigrant alien to agree to leave the United States when his admission visa expires. The IRS said that by accepting that condition the nonimmigrant alien couldn't form the intent to remain. Result: Nonresident status for the estate.

Why did the IRS change its position? In 1978, the Supreme Court held that a nonimmigrant alien holding a G-4 visa has the legal capacity to establish domicile [Elkins v. Moreno (1978), 435 U.S. 647]. The Court noted that because the immigration law didn't restrict intent or length of

studies King's Coll., U. Durham, 1941-30; mem. stall Manchester public libraries, 1950-55; dep. librarian, then librarian Trainty Coll., Dublin, 1958-67; librarian New U. Ulater, Coleraine, No. Ireland, 1967—. Served with Brit. Army, 1941-45. Asso. Library Assn.; mem. Nat. Book League, Royal Dublin Soc., Royal Zool. Soc. Ireland, Assn. U. Tchrs; hon. fellow Library Assn. Ireland. Clubs: Kildare St. and University (Dublin), Royal Irish Yacht. Editor: Treasures of Trinity College, Dublin, 1961; contbr. articles to newspapers, profi. jours. Homes: 72 Bellywillan Rd Portrush Northern Ireland BT36 83N-UK. Office: New Univ Ulster Coleraine Northern Ireland BT352 15A UK.

HURST, KENNETH THURSTON, publisher, b. London, Apr. 3, 1923; came to U.S., 1947, naturalized, 1953; s. Ralph Thurston and Karen (Tottrup) H.; student pvt. schs. Account exec. Hutzler Advt. Agy, Dayton, Ohio, 1948-53; advt. and promotion mgr. McGraw-Hill Book Co., N.Y.C., 1953-58; advt. and publicity mgr. Hawthorn Books, Inc., N.Y.C., 1958-61; gen. mgr. Prentice-Hall Internat., Inc., Englewood Cliffs, N.J., 1963-70, exec. v.p., 1970, now pres; dir. Internat. Book Distbr., Ltd., Prentice-Hall S.E. Asia Ltd., Prentice-Hall India Ltd., State Dept. adviser to Brazil; cons. U. N.C., etc. N.Y. U. Trustee, Valley Cottage Free Library. Served with Royal Navy, 1942-47. Recipient Presdl. E award. Mem. Asia Soc., St. John's Old Boys' Asan, Assn. Am. Pubs. (chmi. internat. div., chmm. del. to India 1979). Am. Mgmt. Assn., Inst. Bus. Planning. Mensa. Republican. Episcopalian. Clubs. Rotary, Englewood, Publishers. Co-author: Books for National Growth, 1965; Indian Publishing since Independence, 1980; contbr. articles to prof. jours. Home: Mountainview East 696 Sierra Vista Ln Valley Cottage NY 10989 Office: Prentice-Hall Inc Englewood Cliffs NJ 07632

HURST, WILLIAM DONALD, cons. civil engr.; b. Winnipeg, Man. Can., Mar. 15, 1908; s. William and Magdalene (Unger) H.; B.S. in Civil Engring, U. Man., 1930; M.S. in Civil Engring, Va. Poly. Inst. and State U.; 1931; m. Gytha Johnson, June 2, 1934; children—Marilyn Ragna (Mrs. Paul C. White). William Helgi Donald. Teaching fellow civil engring. Va. Poly. Inst., 1930-31; resident engr. Office Engr., Engr. Water Works, City of Winnipeg, 1931-44, asst. city engr., 1944. commr. pub. works and bldgs., 1944-72, spl. cons., 1972; pvt. cons., 1973—; sr. research asso. Am. Pub. Works Assn., 1973—; sec., engr., bd. engrs. Greater Winnipeg San. Dist., 1935-39; chmn. bd. commrs. Greater Winnipeg San. Dist., 1935-39; chmn. bd. commrs. Greater Winnipeg Water and San. Dists., 1948-60; commr. winnipeg Sa. Boniface Harbor Commn., until 1972; commr., mem. exec. com., chmn. land com. Nat. Capital Commn., Ottawa, 1970-76; chmn. River and Streams Authority, 1952-71. Chmn. Winnipeg Parking Authority, 1960-72; mem Winnipeg Traffic Commn., until 1972, Man. Floodway Authority, until 1972. Bd. govs. Winnipeg unit Shriners Hosp. Crippled Children, 1972-77; vice chmn. bd. dirs. Miseracordia Gen. Hosp., Winnipeg, 1972-76, bon. counsellor, 1976—Served to capt. Royal Can. Engrs. Res., 1939-44. Decorated Order of Can., 1972; named one of Top 10 Public Works Man of Year, Kiwanis Internat. and Am. Pub. Works Assn., 1962. Registered engr., Man., Minn.; chartered engr., Gr. Britain. Diplomate Am. Acad. San. Engrs. Fellow ASCE; mem Assn. Froff. Engrs. Province Man. (hon. life mem., pres. 1951), Engring. Inst. Can. (chmn. Winnipeg br. 1938, 51, councillor 1958-59), Am. Pub. Works Assn. (Samuel A. Greeley award 1961, pres. 1958-59, vice chmn. research found. 1968-73), Am. Water Works Assn. (pres. 1966-67, hon. mem.), Instn. Water Engrs. Gt. Britain (hon.), Winnipeg Symphony Orch. (pres. 1955-56, hon. counsellor), Phi. Delta Theta. Mem. United Church of Can. Mason (33 deg., Shriner). Clubs: Manitoba. Carieton. Scientific (Winnipeg); Collectors (N.Y.C.)

HURT, ROBERT GLENN, investment banker; b. Pasadena, Calif., Jan. 31, 1919; s. Leslie Milton and Effic Mee (McKim) H.; A.B., U. So. Calif., 1940; postgrad. Harvard, 1941. With sales dept. Calvin Bullock, Ltd., N.Y.C. and Los Angeles, 1946-50, No. Calif. mgr., San Francisco, 1950-65, west coast mgr. San Francisco, 1965-66, v.p., then sr. v.p. Western U.S., San Francisco, 1967—, Served from pvt. to lt. col., AUS, 1941-46. Mem. San Francisco Stock Exchange Club,

Letters; mem. Am. Music Center (Yaddo fel Contemporary Music, French Soc. Composers, A Belgian Royal Acad. Arts and Scis. (asso.), Kapp Kappa Kappa Psi (hon.), Delta Omicron Symphony, 1953; Fantasies for Orchestra, 195 Symphony, 1953; Fantasies for Orchestra, 195 Brass, 1959; Poem for Viola and Orchestra, 1959 for Saxophone and Orchestra, 1961; Mosaiques Fresque for Orchestra, rev., 1964; Sonatina for P Violin and Piano, 1945; Sonata for Piano, 1 Slovakis for Clarinet, Viola and Cello, 1951; Ei 1955; Twelve Moravian Songs, 1956; Poem for V Serenade for Woodwind Quintet and Orchestra, Serenage for woodwind Quinter and Orchestra, Brass Quinter and Orch., 1965; Two Preliu bassoon), 1966; Music for Percussion, 196 saxophone, concert band), 1967; String Quarter, 1969), 1968; Music for Prague, for Band, 196 Apotheosis of this Earth for Winds, 1970; Con. and Winds, 1971; Two Sonnets from Michelang Concerto for Trumphet and Wind Orch., 1973 Earth for Chorus and Orch., 1973, Sonata for 1972-73; The Steadfast Tin Soldier for narrate Sonata for Piano, No. 2, 1975; Monodrama, ballet American Te Deum for mixed chorus, baritone so 1976; also others; commns. from UNESCO, Ki Nat. Endowment for Arts, Friends of Music at Found. Chgo., Butler U., Washington Music S others. Editor French Barok Music: Reconstruc Barok works by Lully and Deialande, 1961-68. He Rd Ithaca NY 14850

HUSAIN, ABUL BASHER MUSHARAF, ed Bangladesh, Sept. 1, 1934; s. Abdur Rahman and 1 (Shaikh) Sarker; B.A. with honors, U. Dacca, 1958 with honors, U. Endon, 1958, P.D., 1960; m. Sept. 27, 1958; children:—Rayhan Mehdi, Muin Rukh, Sr. lectr. Islamic history U. Rajshahi, Bareader in Islamic history, 1961-73, head dep 1961-62, 71-73, prof., 1973—chmn. dept., 1973—arts, 1978—gov Inst Bangladesh Studies, 197 Mem. central adv. bd. archaeology Pakistan Arts mem. Hist. Records and Archives Commn., Pak Varendra Research Mus., U. Rajshahi, 1977; mem for Study of Bengal Art, Dacca Mus., 1976—; me Scholarships Selection com. in history, Islamic h Polit. Sci. and Pub. Adminstrn., 1976, 77. Nuffi 1965; U. London Sch. Oriental and African Studie (v.p. 1975—); mem. Asiatic Soc. Bangiadesh. Islan An Introduction to the History of Muslim Culcontbr. articles to profi. jours. Home: Village Di Dhampti Dist Comilla Bangladesh Office: Dept Isl Rajshahi Bangladesh Office: Dept Isl Rajs

HUSAIN, SYED ABUL BASHER MAHMI Bangladesh, b. Sylhet, Bangladesh, Feb. 1, 191 Mutakabbir Abul Hasan and Salema Khatun Chow U., 1935, LL B., 1939; m. Suña Begum, Dec. 1936, to bar, 1940; pleader Judge's Ct., Dacca, 1940-Habiganj, 1943-48; advocate, then sr. advocate, 1 pleader High Ct. E. Pakistan, 1952-56, sr. govt. acting adv. gen., 1964; judge high Ct. E. Pakistan, Bangladesh, 1972; judge appellate div. High Ct. Supreme Ct. Bangladesh, 1972-75; chief justice Bamem, bar council High Ct. Dacca, 1958-66; chmn. Pakistan Bar Council, 1966-69. Sec. Sundiv. Mu councillor Assam Provincial Muslim League, 1944 India Muslim League, 1945-47, All Pakistan 1947-55; mem. 1st Constituent Assembly Pakista Commonwealth Parliamentary Assn., 1950-54, fn Union, 1950-54; hon supt. Darul Ulum Govt., 19 bd. Habiganj, 1944-50; exec. council Dacca U. Pakistan Tea Bd., 1951-55; mem. local adv. com. 1 dir. Pakistan Refugee Rehab Fin. Corp., 1953-54; r

HUBA, KAREL, composer, conder, 'ed, Czechoslovakir, Aug. 7, 1921; a Karel and Boxil diploma summa cum hude, Conservatory and A 1945; 47; grad. Conservators de Paris, 1947; D. Nu Conducting Ecole Normale de Paris, 1947; D. Nu Conducting Ecole Normale de Paris, 1947; D. Nu Elizabeth, Caroline, Came to 11.5, 1952; children-Biragheth, Caroline, Came to 11.5, 1954, natur. Paris, Zurioh, Sulese Romande, London, Mar Paris, Zurioh, Sulese Romande, London, Mar Paris, Caronell U., Ithace, N. 7, 1954., prof. isculy Connell U., Ithace, N. 7, 1954., prof. isculy Connell U., Ithace, N. 7, 1954., prof. in the sule of the prof. 1954.

HURTIG, SERGE, educator; b. Buchateat, Rung, A. Ackander and Anna (Stern) H.; student of Coregerown U.; 1946-48, Inaz. Polit. Studies. Offergiener, Initial profession Natural Documentation Networks are in 1971-6, ich studies and research grad present politicates, Paris, 1931, asso dit, 1957-69, ich polit. Sels. Polit. Studies, 1935-769, ich present present

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HURST, DENVIS, edni adminatr., b. Whitehaven, Cumbria, U.K., Nov. 16, 1926; s. James and Edith Margery H.; B.S. in Agr. with honors, Durham U.; 1920; M.S. in Adminat Hubandray (Kellogg fellow, 1992). 60; U. Idaho, 1990; m. Mergery Helem Morgan, Mar. 22, 1952; 1992; editleren-bon David, Robert James, Richard George, Susan Margaret, Asar, agit, edn eduter, Salop County Council, Shrewabury, Margaret, Asar, agit, edn eduter, Parker, U.K., 1954-64; prin Bishop Burton Coll, Rg., Beverley, North Humberside, U.K., 1964—Served With Royal Army, 1944-47. Fellow Yorkshire Agit, Adventuers, with Royal Army, 1944-47. Fellow Yorkshire Agit, Adventuers, Served Margaret, P. M., Agit, Bon, Morgan, J. M., 1954-64; prin Bishop Morgan, Agit, Soc. Eng. (council), Mem. Ch. of Eng. Club; Internat. 1909; Internat. Rotsty. Agit, Soc. Eng. (council), Mem. Ch. of Eng. Club; Internat. Sotsty. Segulate on the conference of Adventuers and vasectomy in tems in U.K. Home: 31 Higheroff Cherry Burton College, of Agriculture Bishop Burton Gollege, of Agriculture Bishop Burton Beverley U.

HÜRLIMANN, HANS, Swiss politicism and lawyer; b. Walchwil. Sug, Apr. 6, 1918; ed. univas Fibourg and Berner. m. Maire: Fletes DMI, 1949; mem. legis. chamber Zug, 1946; legal adv., 1946, town clk., 1949; mem. legis. chamber Zug Canon, 1946; head dept. justice, politics and milit editarie. Connecil Sovie, 1946-46, cdn., cultural and mili adiaris. 1945-73; mem. Council O'Susc, 1966-73; mem. Fed. Council Depts., 196-68; Conf. Heads of Cantonel Mili Suscing Council Swiss Fed. Inst. Tech., 1970-73; former mem. exec. bd. Depts., 196-66. The Council Swiss Fed. Inst. Tech., 1970-73; former mem. exec. bd. Statis. Proceedings of the Council Swiss Fed. Inst. Tech., 1968-73; mem. Swisser. Sw

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> Pepping, Dec. 26, 1937; children—Michael Keith, Patricia Ann-Instr., U. Houston, 1940-42; asst. prof., asso. prof. Okla. U., 1945-49, faculty Iowa State U., Ames, 1949—, prof. geology, 1954-79, prof.

Nous confirmons avoir reçu de

Mr. Kenneth Thurston HURST

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le livret pour étrangers C 223.98.458.153

du Dr Paul BRUNTON, décédé le 27 juillet 1981 (son père)

Montreux, le 28 juillet 1981

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Montreux, le 48 juillet 1981

## PROCURATION

Par la présente, je donne plein pouvoir à la Société de Banque Suisse à Montreux, afin que celle-ci puisse me représenter dans la liquidation de la succession de mon père, Dr Paul BRUNTON, décédé le 27 juillet 1981.

Course Thuston Hurst.
Kenneth Thurston Hurst

Montreux, le 30 juillet 1981

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#### ARVI A. KARISTO OY

Hämeenlinna, Finland

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### ARVI A. KARISTO OY

Hümeenlinns, Finland

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St (up fune 18) (201) 379-6872 Bruce Kendall 20 Great Oak Drive Short Hills, NJ (near Summit) 07078 z offered to help on PB's work « in wheeldair

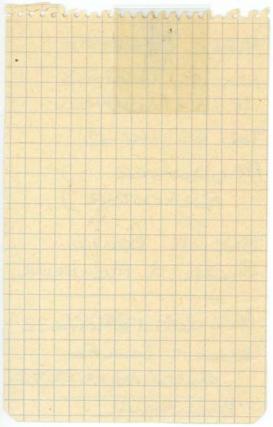
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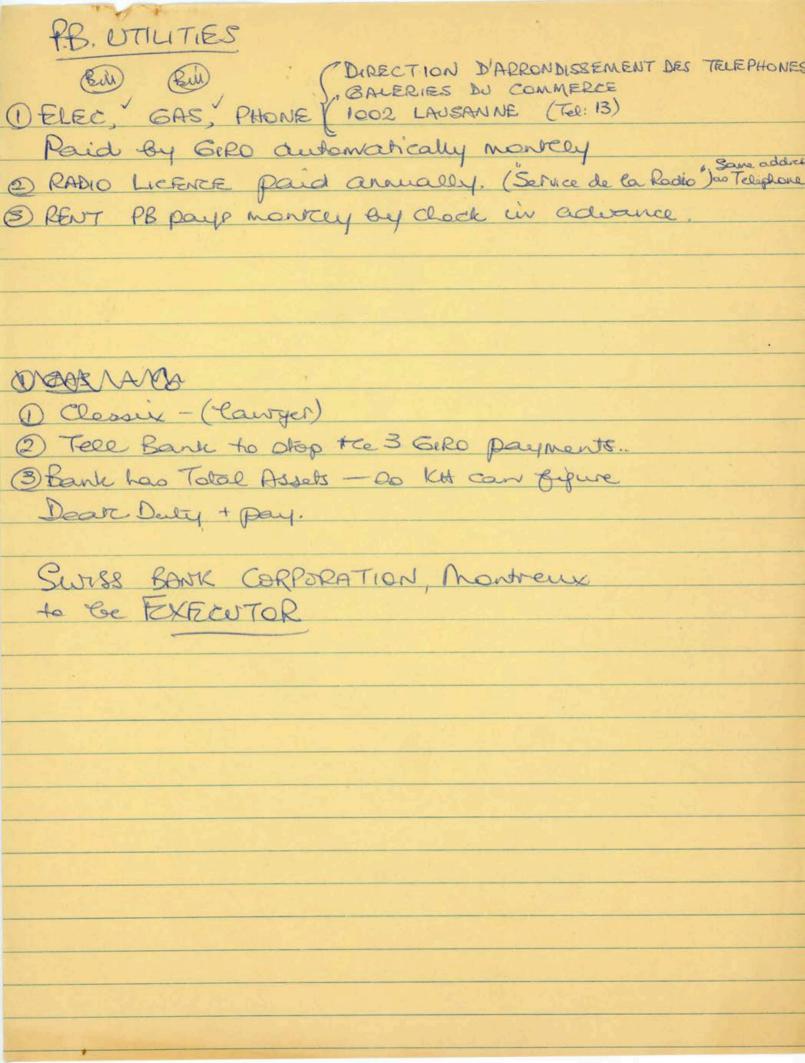
Sunder Narayanan 2201 B Melrose Dr. Champaign IL 61820 Seen 6/22 Seen 6/22

January 20, 1992

E. Long 102 Patricia St. Auburndale, Fl. 33823

MARC CHESSEX rue du! Théâtre 3 1820 Montreux Tel: 62-44-12 PB CAESOFER ) - REXECUTOR ) Sociale Barque Suisse à Montreux low dated \$ 28 fee 72 Codesia e Bank Ex, classed March 22,73 Montreux





ADTION PLAN (1) Eva well cable me + inform lawyer MARC CHESSEX 2 Les BAPES FUNÈBRES GÉNÉRALES S.A., MONTPEUX 61-21-29, Muddla gate 20. 3 Banki (Société Banque Suisse de Montreux) et Ken pap all outstanding Bills (light, water, gas, kent) + takes over Keys to apart ment - Get/copies Dear Certificing

(It fly t see Funeral Parlor + wake arrangements

No minister

For cremation services levels Eva + Beau + artur.

S and register he dear in montreux, Keopashes in an insulation.

(3) Bank has list of all contents of flat (needed for Municipality capital weals tax) so key was cleak + I can use to clock nothing oussuf. (6) Sevetelland does have don't duties. @ Gave E+B aloice of furneture + household extended + Deal Ke rest. I Give Ken Kein Begnests.

Prove Cureur to come for a week + Dlay dr plan + anange to

B) Have Balance — Object d'ant + Books they + Files

(in apparate cantons), Hoydar w. Njack.

packed + Oheppad to me c/o Prentice - Hall. (1) ANDRE EFELER (Asst. Mpr.)

(2) A Bank will notify me of balance monies due. Tell tem to transfer to Nate, Westminster Holborn direct. (10) KH notigy feders + Duttons, to send me royalties / in future - + Devol deale certificate. (Check PH Logal Dept. - How do it) LOR BANK to do? Yes. - Ket to Dee the Bank here re above done. KH inform Piders to forward/Correspondence to me + 904 Dend Mineral Cetter.

Accorded to the opening courses of the second of the secon - Kell to Dee 150 Book hore 10 above done

# ACTION PLAN PB

1) Noër to cable 14t. KH fly Twich, meet Ken and come onto Montreson (or arrange meet Ken in Montreux). 3) KH Contact M. JETZER, GA Avenue Laplandos, - Montreux agent for SociETÉ VAUDOISE de CREMATION re Carte de Membre # 19029 (See #7 BELOW) arrange were M. Jetzler for cremation at 4) POMPES FUNEBRES GENERALES 22-92-01 (203801)
MAUPAS 6, LAUSANNE. (021) 61-21-29. tuneral cremation pervice? 5) KH take ables (buy nice un from funcal home) 6) RE #3 ABOUR - SOCIETÉ VAUDOISE DE CREMATION, 7) CAROLINE I, 1000 LAUSANNE. (021) 22-15-33. (PB Lat paid ten 600 SF.) 8) KH SEE MARC CHESSEX, MARNIE AUTHORITHMAN MONTHERN (021) 62-44-12 re PB's genal + valid WILL of March 1972. It Duporcedes all oros. CHESSES Probates Will. The JUDGE grants to 9) the EXECUTOR (KH) the automy to proceed once Will is proven. KA viset Rider (as executor) explain PB's 10) now to be paid to netown). They are currently paid into National Grindlays; No BRITISH TAX 18 WITHELD. Rider have a Certificate of Exemption (as a working autor) from Inland Revenue from tax.

-> Find out if por-resident has royalty tax willield

EN SEE MARK CHESSEY, DORNAL MARKETHAN MAN WAS IN

# ACTION PLAN PB.

- Noër to cable KH. 2) KH fly Turich, meet Ken and come onto MONTREW (or arrange meet Ken in Montreux). KH Contact M. JETZER, GA Avenue Laplandos, 3) - Montreux agent for SociETÉ VAUDOISE de CREMATION re Carte de Membre # 19029 (See #7 BELOU) arrange were M. Jetzler for crenation at 4) POMPES FUNEBRES GÉNÉRALES 20 RUE DE LA GARE, MONTREUX. MAUDOS E, LAUSANNE. (021) 61-21-29. tuneral demotion Dervice? 5) KH take asles (buy rice un from funeral home) 6) POLITICE #3 ABOUE - SOCIETÉ VAUDOIRE DE CREMATION,

  MUNICIPIUX

  CAROLINE 1, 1000 LAUSANNE. (021) 22-15-33. 7) (PB has paid Ken 600 SF.) KH See MARC CHESSEX, ADEMUE DU CASING 11, MONTPEUX 8) (021) 62-44-12 re PB's genal + valid WILL of March 1972. It Dispercedes all orces. CHESSES Probates Will. The JUDGE grants to 9) the EXECUTOR (KH) the authority to proceed Once Will is proven. (Do I have to oppear in person?) NOW to be paid to me (town). They are currently 10) paid into National Grindlays; No BRITISH TAX 18 WITHELD. Rider have a Certificate of Exemption (as a working autor) from Inland Revenue from tax.
  - 11) Vell Duttons re royalties.

    12) EIRO automatically pays elec, gas, plane Bills monthly.

    13) PB Dands Pays oney IRIL RENT, monrey in advance.

Funda Committees Convice ? KH take appear (buy never wan from Finance home THE RE #3 ABOUR -- SOCIETÉ VAUDOISE DE CREMATION PS LOW DOUGH TEAM GOO EF.) KH SOC MARC CHESSRY, BELLENGISHIN, MULTIPLY March 1972! It Duporoudes all writing CHESSEL PROBLED WILL. The JUDGE GRENTS to the Extension (Kit) the authority to proposed now to the point to me the way are of war Exemption (as a washing an interfigure