

ESTATE PLANNING

GENERATION SKIPPING TRANSFERS

In General:

The Generation Skipping Transfer Tax is the consummation of a projected begun years ago by a government desirous of stopping the vast transfer of wealth from generation to generation that was beyond the reach of the transfer tax system. That “system” was traditionally comprised of the Federal Estate Tax and the Federal Gift Tax. Because of the way those codes were devised, transfers in which intervening generations had only “limited” interests, those interests escaped the reach of these excise taxes. For instance, §2033 of the Estate Tax Code reached only interests held by a decedent to the extent of those interests. If a father created a trust and in that trust gave his children an income interest for their lives with the remainder continuing for the next generation, and so forth, those intervening generations had no “interest” in the previously created trust because that interest (only a right to income for life) expired on the death of the individual beneficiary in favor of the next generation.

The first real attempt to close this loophole came with the Tax Reform Act of 1976. The Generation Skipping Transfer Tax envisioned in that law was quite cumbersome (more so than the present law) and attempted to assess a tax which would be equal in amount to the estate tax avoided by the use of carefully drafted trusts. Unfortunately, the tax was so complicated that no generation skipping tax returns were ever filed because no one knew how to compute the tax. In 1986, with the total revamp of the Internal Revenue Code, the present Chapter 13 was introduced into the Code in essentially the format we employ today. It is that version of the Generation Skipping Transfer Tax that we will explore in this course.

Terminology:

As with most legal subjects, the Generation Skipping Transfer Tax has its own set of unique terms. What follows are the most important concepts for understanding the operation of this tax system.

Transferor: The person who makes the transfer which is immediately or ultimately subject to the GSTT is the “transferor.” The transferor may change as estate or gift tax is incurred with respect to trust interests. A trust may have multiple transferors (grantors/settlers). If it does, the portion of the trust attributable to each transferor’s contributions will be treated for GSTT purposes as a separate trust.

Members of the Family: Certain generation assignments are determined by reference to family relationships. We’ll call these people in those relationships

“members of the family.” The following people are the members of a transferor’s family: *descendants of transferor’s grandparents; the transferor’s spouse and his ex-spouse(s); descendants of the spouses and ex-spouse’s grandparents; and the spouses and ex-spouses of all categories of persons previously listed.*

Interest: Who has an interest –

Individuals – an individual has an interest in a trust if he is at the time a permissible *distributee of income or principal from the trust.*

Charities - *A charity has an interest in a trust only if it has a present right to distributions (as opposed to being a permissible distributee of discretionary distributions*

Ability to Have Support Obligations Paid: *If an individual’s support obligations may be satisfied through mandatory distributions of trust income or principal then that individual is deemed to have an interest in the trust.*

If support obligations may be satisfied through discretionary distributions, however, the individual will not be deemed to have an interest.

EXAMPLE:

Child is the parent of Grandchild. Trust A provides that the trustee shall distribute income and principal for Grandchild’s support, without regard to Child’s duty or ability to support Grandchild. Grandchild is a minor. Child has an interest in the trust. If Trust A contained the word “may” instead of “shall” Child would not have an interest.

Court ordered support obligations: *Suppose a child is a divorced parent who has judicially or contractually imposed child support obligations exceeding basic state law requirements for parental support. What if the trust allows those child-support obligations to be satisfied from the trust funds? The regulation providing Child has no interest solely due to the trust’s ability to satisfy his obligations speaks of “support obligations” and does not specify whether support means the basic state law standard of support or whether it includes a broader standard imposed by a court (or a contractual settlement agreement incident to a divorce). If the term “support” means basic state law standards, and the trust permits trust funds to be used to make Child’s support payments of \$10,000 a month, Child may have an interest in the trust because trust funds could be distributed on child’s behalf.*

Custodial Accounts (UGMA or MTMA)

LOOK THROUGH RULES

If a corporation, partnership, estate, trust, or other entity (but not a charity or a government) holds an interest in property, individuals who have a beneficial interest in the entity are treated as having an interest in the property.

EXAMPLE:

Mom owns a receivable from Corporation. The stock of corporation is owned by a trust for Grandchild. If Mom forgoes payment due on the loan, then under certain circumstances, she may be treated as having made a gift. If so, the gift will be a direct skip and may give rise to a GSTT.

SKIP PERSON

The Generation Skipping Transfer Tax applies to transfers to **skip persons**, directly or through a trust. A “skip person” with respect to a transferor includes:

- A family member who is in the generation of the transferor’s grandchildren or a younger generation – e.g. the transferor’s grandchild and step-grandchild (and their spouses);
- A person who is more than 37 ½ years younger than the transferor and is not a member of the transferor’s family;
- A trust, if the only beneficiaries who have interests in the trust are skip persons (or skip persons and charities, if the trust is a charitable remainder trust); and
- A trust that has no permissible current beneficiaries and that can never distribute property to anyone but skip persons (e.g., a trust that must accumulate income until Mom’s grandchild is 21 and then terminate in favor of the grandchild or other skip persons).

NON-SKIP PERSON

A “non-skip person” is a person who is not a skip person. Thus, any person in a generation above the transferor’s grandchild’s generation is a non-skip person, and a charity or a governmental entity is a non-skip person.

HOW TO IDENTIFY “SKIP” AND “NON-SKIP” PERSONS

Family Members:

Generations are determined by relationship to the transferor, in the case of a family member: (1) The transferor’s spouse and ex-spouses are assigned to the transferor’s generation; (2) a spouse or ex-spouse of a relative of the transferor (by blood or adoption) is assigned to the same generation as the relative; (3) a family member who is a member of more than one generation is assigned to the **youngest applicable generation.**[26 U.S.C. §2651(f)(1)]

EXAMPLE:

Mom [the transferor] has adopted her granddaughter. The granddaughter is assigned to the grandchild’s generation, even though she is also Mom’s adopted child.

Other Persons:

A person who is not a family member is assigned a generation based on the difference between his age and the transferor’s age –

- A person who is no more than 12 ½ years younger than the transferor is in the transferor’s generation
- A person who is more than 12 ½ years younger than the transferor (but no more than 37 ½ younger) is in the transferor’s children’s generation, and so on every twenty-five years.

MORE LOOK THROUGH RULES:

Persons who have interests under the “look-through” rules are assigned to generations accordingly.

EXAMPLE:

Mom establishes Trust X. Trust X can distribute funds to Trust Y, which can currently distribute to A and B. A and B, who are unrelated individuals, have interests in Trust X under the look-through rules. A, who is 35 years younger than Mom, is a non-skip person. B, who is 40 years younger than Mom is a skip person.

GENERATION ASSIGNMENT CHANGES

Generation assignments can be changed by marriage, divorce, or adoption, sometimes. This can happen by bringing a non-family member into the family by marriage or adoption. Other than these two, generation assignments will not be affected by family changes.

- **Marriage.** If Mom's boy friend is 40 years younger than she is, then transfers by Mom to Boyfriend or his children will be generation-skipping transfers. If Mom marries boyfriend, however, Boyfriend and his children will no longer be skip persons.
- **Divorce.** If Mom's step grandchildren are 15 years younger than Mom, can she step up their grandchildren's generation assignment to her children's generation by divorcing her husband (i.e., their grandfather), and having the unrelated persons rules apply? NO. If Mom and Husband divorce, Husband and his descendants will retain whatever generation assignments they had when Mom and Husband were married. [26 U.S.C. §2651(b)(2)]
- **Adoption.** If Mom is 40 years old, and she adopts an unrelated three day old baby, the baby is in her child's generation. [§2651(b)(3)(A)] If Mom adopts her three day old biological grandchild, the adopted grandchild remains in the grandchild's generation. [§2651(f)(1)]

DIRECT SKIPS

A transfer of an interest in property that is (1) subject to gift or estate tax and (2) is made directly to a skip person is a "direct skip." A transfer can be subject to gift or estate tax even if no tax is actually payable. This could happen, for example, if Mom makes a gift to a grandchild that uses her applicable exclusion amount.

PREDECEASED ANCESTOR EXCEPTION

The predeceased ancestor rule applies in certain situations where deaths occur "out of order."

As a working definition, the term "transferor group" refers to the transferor, the transferor's spouse, and the transferor's ex-spouse.

- **Descendants of Members of the Transferor Group.** The predeceased ancestor exception generally applies when a descendant of a member of the transferor group had predeceased the transferor. In such a case, the descendants of the predeceased person will "move up" a generation. [26 U.S.C. §2651(e)(1); Reg. §26.2612-1(a)(2)(i)]

EXAMPLE:

Mom transfers property to Grandchild. Grandchild's parent is deceased at the time. Under the predeceased ancestor exception, Grandchild will "move up" to Child's generation, so that the transfer will not be a direct skip.

The predeceased ancestor does not have to be the transferor's child. Thus if Mom transfers property to Great-grandchild, and if Child and Grandchild are deceased at the time, the transfer to Great Grandchild will not be a direct skip, due to the "move up" rule.

- **Eligible Collaterals.** In limited situations, the predeceased ancestor exception applies to collateral relatives. An eligible collateral relative is: (1) a person who is not a descendant of a transferor group member, but (2) who is a **descendant of a parent of a transferor group member**. In such a case, the collateral transferee will "move up" a generation if the transferor has no living lineal descendants at the earliest time that the transfer (from which an interest of the transferee is derived or established) is subject to gift or estate tax imposed upon the transferor.

EXAMPLE:

Great Uncle Joe has no living descendants. His sister has one deceased child and one living grandson by the deceased child. If Joe makes a gift to his sister's grandson, the predeceased ancestor provision will apply. Joe's grandnephew will be considered to be his nephew for purposes of the GSTT and the transfer will not be considered a direct skip. [The Grandson is NOT a descendant of a transferor group member BUT is a descendant of a parent of a transferor group member]

- **Ninety Day Survival Rule.** For purposes of the predeceased ancestor exception, if Child (for example) dies within 90 days after Mom's transfer to Grandchild or lower generation descendant, Child will be treated as predeceasing Mom to the extent that the governing instrument or local law provides that Child is deemed to predecease Mom.

EXAMPLE:

Mom dies. She leaves her estate to Child, but provides in her will that if Child does not survive her by at least 90 days, Child will be treated as predeceasing her, and Grandchild will take the estate. If Child dies 60 days after Mom dies, Grandchild will "move up" a generation, and the transfer to Grandchild will not result in a GSTT

Transfers to Trust After a Beneficiary Dies

The predeceased ancestor exception can apply to transfers to a trust in which the deceased ancestor once had an interest.

EXAMPLE:

Mom transfers property to a trust for Child and Grandchild. Child dies two years later, while Mom is still alive. Child's death is a taxable termination, and Mom will "move down" a generation with respect to the property in the trust at Child's death. If Mom makes new transfers to the trust after Child's death, those transfers will be deemed to be made to a separate trust, and Grandchild will move up a generation for purposes of those new transfers, which would otherwise be considered direct skips.

Effect of Disclaimers

- The predeceased ancestor exception only applies when the ancestor in question is actually deceased (or actually dies within 90 days of his own ancestor, as discussed above). Subject to the 90 day rule, the predeceased ancestor exception does not apply if the ancestor is actually alive and is simply treated as if he were deceased under local law for other reasons (e.g., disclaimers)
- A disclaimer can, however, result in a direct skip. If the transferor's remaining GSTT exemption is not sufficient to cover the transfer of the disclaimed property or is not allocated to the property, a GSTT will be due. The GSTT will be payable from the disclaimed property, in the absence of a contrary apportionment clause specifically referring to the GSTT and directing that it be paid out of other property. Many apportionment clauses specifically direct that the GSTT on a direct skip be paid out of the residuary estate, which may not be desirable in the case of disclaimers.

EXAMPLE:

Mom leaves her residuary estate in equal shares to Son and Daughter. If a child predeceases Mom or disclaims, that child's share is to go to the deceased or disclaiming child's children. Daughter disclaims, creating a direct skip from Mom's estate to Daughter's children. If the apportionment clause in Mom's will directs that GSTT on all direct skips paid by the residuary estate, then Son will bear one-half of the GSTT with respect to the direct skip to Daughter's children.

Transfers Subject to Withdrawal Powers

A transfer to a trust that gives a skip person withdrawal powers is not a direct skip unless the trust is otherwise a skip person. Accordingly, if Mom contributes \$30,000 to a pot trust for Mom's descendants, and the trust provides that Son, Daughter, and Grandchild each have a right to withdraw \$10,000, the transfer is not a direct skip to any extent.

Look Through Rules

The look through rules that generally apply to entities do not apply in determining whether a transfer to a trust is a direct skip. Said another way, a transfer to a trust is not a direct skip unless the trust itself is a skip person.

EXAMPLE:

Mom gives property to trust. Trustee can make current distributions to Son and Grandchild in any proportion. The look-through rules do not apply to cause Mom's transfer to be treated as in part as a direct skip to Grandchild.

Remember, tax on direct skips is normally paid by the transferor (if a lifetime gift) or by the transferor's estate (in the case of a direct skip taking effect at the transferor's death). If a direct skip occurring at the transferor's death is made from non-probate property, the executor has a right to recover the tax.

TAXABLE AMOUNT

The amount of a direct skip is generally the amount that the transferee actually receives. However, the IRS has ruled that a reduction in the amount actually received by the transferee due to payment of interest on an underpayment of GSTT applicable to a direct skip does not reduce the amount of a direct skip. Similarly, according to the IRS, neither the interest payable on estate tax underpayment nor the interest earned on an estate tax overpayment affects the taxable amount of the direct skip.

TAXABLE DISTRIBUTION

A distribution of property to a skip person from a trust that can currently distribute to a non-skip person is a taxable distribution.

THE PREDECEASED ANCESTOR EXCEPTION DOES NOT NORMALLY APPLY TO TAXABLE DISTRIBUTIONS. IT WILL, HOWEVER, APPLY IF THE PREDECEASED ANCESTOR IS DEAD AT THE EARLIEST TIME THAT THE TRANSFER ESTABLISHING THE BENEFICIARY'S INTEREST IS SUBJECT TO GIFT OR ESTATE TAX.

EXAMPLE:

Grandpa has one deceased Child and one living Grandson by the deceased Child. If Grandpa establishes a trust for Grandma and Grandson, a distribution to Grandson during Grandma's life will not be a taxable distribution because the child was deceased when the trust was created.

Deemed Distributions – Withdrawal Rights

If estate or gift tax is imposed on a beneficiary with respect to a trust interest, that trust interest is treated as being distributed to the beneficiary to the extent that the interest is subject to estate or gift tax.

EXAMPLE:

Mom contributes \$27,000 to a new trust. Son, Daughter, and Grandchild each have a right to withdraw \$9,000. The rights of withdrawal lapse at the end of the year. In this case, a lapse of a general power of appointment is a gift to the trust to the extent that it exceeds \$5,000. Assume that no beneficiary has a power of appointment that would prevent the lapse from being considered a taxable gift, and that applicable law would not result in a beneficiary's interest being available to his creditors on account of the lapse. Mom makes no other transfers to any beneficiary in that year. For GSTT purposes, the lapses will be treated as a \$4,000 distribution from the trust to each beneficiary. The deemed distribution resulting from the lapse of Grandchild's withdrawal right will be deemed a taxable distribution to Grandchild, followed by a deemed taxable gift by Grandchild to the trust of the lapsed amount.

A skip person's exercise of a withdrawal right over a trust may also result in a taxable distribution.

EXAMPLE:

Mom contributes \$27,000 to a new trust. Son, Daughter, and Grandchild each have a right to withdraw \$9,000. Unexercised rights of withdrawal lapse at the end of the year. If Grandchild allows his right to lapse, the lapse will be treated as a taxable distribution from the trust only to the extent it exceeds \$5,000. However, if Grandchild exercises his withdrawal right over \$9,000, then the entire actual withdrawal (not just \$4,000) is treated as a taxable distribution.

Summary:

The lapse of a skip person's withdrawal right (in excess of a five/five power) is a taxable gift by the skip person (although it will be incomplete if the skip person retains a limited power of appointment or if the lapse renders the lapsed amount subject to the skip person's creditors). If the lapse is a completed gift, it will also be a taxable distribution from the trust (or a direct skip from the trust as the case may be).

The exercise of a skip person's withdrawal right is a taxable distribution (or direct skip, as the case may be).

If the donor wants to avoid a generation skipping transfer in such situation, his GSTT exemption must be allocated to the trust or the trust must be structured to qualify for the GSTT annual exclusion requirements.

Distribution from One Trust to Another Trust

If a distribution is made from one trust to another trust, a taxable distribution will only occur if the distributing trust **IS NOT** a skip person and the recipient trust **IS** a skip person.

EXAMPLE:

Mom creates a pot trust for her grandchildren that lasts until the youngest is age 25. At that point, the trust divides into a separate trust for each then living grandchild. The division of the pot trust assets into separate trusts is not a taxable distribution (or other taxable transfer).

EXAMPLE:

Mom creates a pot trust for her children and descendants of a child who died prior to the trust's creation. The trust lasts until her youngest child is age 25. Any distributions to a deceased child's descendant who is under age 18 are made to a separate trust for that descendant. The trustee's distribution of property to a trust for a minor descendant of the deceased child will not be a taxable distribution [predeceased ancestor exception]

EXAMPLE:

Mom creates a pot trust for her descendants. The trust lasts until her youngest child is age 25. At that point, the trust property is divided among Mom's children and descendants of any deceased child, with each individual's share being held in a separate trust for the benefit of that individual and his or her descendants. All of Mom's children are alive at the time she creates the pot trust. When the pot trust terminates, any share allocated to a trust for a child of Mom and that child's descendants will not result in a taxable distribution, because the child (a non-skip person) still has an interest in the trust. Any allocation to a trust for a grandchild of Mom and the grandchild's descendants should be considered a taxable distribution because the distributing trust is NOT a skip person and the recipient trust itself IS a skip person (that is, a non-skip person has an interest in the trust).

Multi-character Distribution

A distribution that could also be characterized as a direct skip or a taxable termination will not be considered a taxable distribution.

EXAMPLE:

Mom creates a trust for benefit of Child and Grandchild. The Trustee may distribute income and principal to either Child or Grandchild in Trustee's discretion. Trustee distributes all of the trust assets to Grandchild. Although this distribution could be viewed as a taxable distribution, it is also a taxable termination and will be treated as such.

Payment of the tax on a taxable distribution will be paid by the distributee. A deduction is allowed for expenses incurred by the distributee in connection with the determination, collection, or refund of the GSTT on the distribution. If the trust pays the tax with respect to a taxable distribution, the tax payment will be considered an additional taxable distribution made on the last day of the taxable year in which the original taxable distribution was made.

Taxable Terminations

A termination of a person's interest in a trust is a taxable termination if:

The only persons left with an interest in the trust are skip persons
OR

No beneficiaries of the trust have an interest and there is less than a five percent likelihood that a distribution to a non-skip person will ever occur.

EXAMPLE:

Mom establishes a trust for the life of Child with the remainder on Child's death to be held in trust for Grandchild and Great Grandchild. Child's death during Grandchild's life is a taxable termination of Child's interest. If the trustee subsequently distributes the entire trust property to Great-Grandchild, the distribution is a taxable termination of Grandchild's interest.

A TAXABLE TERMINATION WILL TYPICALLY OCCUR IF A TERMINATION OF ANY NON-SKIP PERSON'S INTEREST IN A TRUST OCCURS UNLESS:

- **THE PROPERTY IN TRUST IS THE SUBJECT OF A TAXABLE TRANSFER FOR ESTATE OR GIFT TAX PURPOSES ON THE TERMINATION**
- **A NON-SKIP PERSON STILL HAS AN INTEREST IN THE TRUST**

OR

- **IT CAN BE ACTUARILLY ASCERTAINED THAT THE PROBABILITY THAT A DISTRIBUTION WILL EVER BE MADE TO A SKIP PERSON IS LESS THAN FIVE PERCENT.**
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- A TAXABLE TERMINATION DOES NOT INCLUDE ANY TERMINATION TO THE EXTENT THAT A TRANSFER SUBJECT TO ESTATE OR GIFT TAX OCCURS WITH RESPECT TO THE PROPERTY HELD IN TRUST AT THE TIME OF THE TERMINATION.
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- A TRANSFER THAT WOULD OTHERWISE BE CONSIDERED A GENERATION SKIPPING TRANSFER WILL NOT BE TREATED AS SUCH IF:

- (1) THE PROPERTY TRANSFERRED HAS ALREADY BEEN SUBJECT TO GSTT;
- (2) THE PREVIOUS RECIPIENT WAS IN THE SAME GENERATION AS, OR A LOWER GENERATION THAN, THE CURRENT RECIPIENT

AND

- (3) THE TRANSFER DOES NOT HAVE THE EFFECT OF AVOIDING GSTT

AFTER A GST OCCURS:

ONCE A GST TAKES PLACE WITH RESPECT TO PROPERTY IN A TRUST, THE TRANSFEROR WILL BE GIVEN A NEW GENERATION ASSIGNMENT. HE WILL BE DEEMED TO BE IN THE FIRST GENERATION ABOVE THE HIGHEST GENERATION OF ANY PERSON WHO HAS AN INTEREST IN THE TRUST.

EXAMPLE:

Mom establishes a trust that provides for successive life interests in Child, Grandchild, and Great Grandchild. Child dies, causing a taxable termination. Mom will be moved down to Child's generation. This means that Grandchild will become a non-skip person, and subsequent distributions to Grandchild will not be treated as taxable distributions. When Grandchild dies, there will be a taxable termination of his interest and Mom will be moved down to Grandchild's generation.

BASIS ADJUSTMENT

GENERAL RULE:

THE BASIS OF PROPERTY THAT IS THE SUBJECT OF A GST IS INCREASED (UP TO ITS FAIR MARKET VALUE) BY A PORTION OF THE GSTT. THAT PORTION IS THE AMOUNT OF GSTT ATTRIBUTABLE TO THE PROPERTY'S APPRECIATION. THE PROPERTY'S APPRECIATION IS THE EXCESS OF ITS FMV OVER ITS BASIS AT THE TIME OF THE GST. THIS BASIS RULE APPLIES AFTER TAKING ANY ADJUSTMENT FOR GIFT TAX PAID ON THE APPRECIATION INTO ACCOUNT

ALLOCATION RULES

Allocation Rules are set forth generally in 26 U.S.C. §2632

An allocation may be made by an individual of his Generation Skipping Tax Exemption under §2631(a) at any time on or before the date prescribed for filing the estate tax return (Form 706) for such individual's estate (determined with regard to extensions), regardless of whether such a return is required to be filed. This allocation can also be made on a timely filed Gift Tax Return (Form 709).

Deemed allocation to certain lifetime direct skips: If an individual makes a direct skip during his lifetime, any unused portion of such individual's GST exemption shall be allocated to the property transferred to the extent necessary to make the inclusion ratio for such property zero. If the amount of the direct skip exceeds such unused portion, the entire unused portion shall be allocated to the property transferred. *An individual may elect not to have this automatic allocation rule apply.*

Deemed allocation of certain lifetime transfers to GST trusts: If an individual makes an indirect skip during such individual's lifetime, any unused portion of such individual's GST exemption shall be allocated to the property transferred to the extent necessary to make the inclusion ratio for such property zero. If the amount of the indirect skip exceeds such unused portion, the entire unused portion shall be allocated to the property transferred.

The unused portion of an individual's GST exemption is that portion of such exemption which has not previously been:

- (A) Allocated by such individual,*
- (B) Treated as allocated under subsection (b) of §2032 with respect to a direct skip occurring during or before the calendar year in which the indirect skip is made, or*
- (C) Treated as allocated under paragraph (1) with respect to a prior indirect skip.*

PROCEDURE:

DIRECT SKIPS. *The exemption is automatically allocated to a direct skip made during the transferor's lifetime unless the transferor elects otherwise. The automatic allocation is irrevocable after the due date of the return reporting the transfer. Some practitioners like to make the allocation on the gift tax return for purposes of the record. An affirmative allocation to a direct skip is made on Form 709, Schedule C, Part 3. An election not to allocate the exemption is also made on a timely filed gift tax return. Alternatively, the timely filing of a gift tax return, together with payment of the GSTT with respect to the direct skip will prevent automatic allocation of the exemption. An election not to allocate is generally irrevocable.*

INDIRECT SKIPS. *The exemption is automatically allocated to indirect skips for transfers made and estate tax inclusion periods ending after 2000 and before 2010, and if EGTRRA is extended, after 2010*

Defined. The concept of an indirect skip was introduced by EGTRRA in June 2001. It is defined as any transfer of property subject to the gift tax (other than a direct skip) made to a GST Trust.

GST Trust – General Rule. *A GST Trust is any trust that could have a generation skipping consequence with respect to the transferor unless the trust meets one of six exceptions:*

One: Trust required to distribute to non-skip person under age 46 . The automatic allocation does not apply if the instrument

Some examples used in this document are taken from or based upon information contained in *Estate Planning and Wealth Preservation, Abridged Edition for Student Use*, by Kathryn G. Henkel, Warren, Gorham & Lamont, 1998 (as updated by supplement)

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