

## UNITED STATES TAX COURT

ESTATE OF WILLIAM M. DAVIDSON, )  
 DECEASED, JONATHAN S. AARON, AND )  
 ERIC L. GARBER, CO-PERSONAL )  
 REPRESENTATIVES, )  
 )  
 )  
 ) Petitioners, )  
 )  
 ) Docket No. 13748-13  
 )  
 )  
 ) COMMISSIONER OF INTERNAL REVENUE, )  
 )  
 ) Respondent. )

## DECISION

Pursuant to the agreement of the parties in this case, it is

ORDERED AND DECIDED: That there are deficiencies in gift tax due from petitioners and additions to tax thereon, in the following amounts:

Year	Gift Tax Deficiency	Addition to tax pursuant to I.R.C. § 6651(a) (1)	Addition to tax pursuant to I.R.C. § 6651(a) (2)
2005	\$5,428.00	\$679.00	None
2006	\$139,014.00	\$17,377.00	None
2007	\$919,085.00	\$114,856.00	None
2008	\$7,582,245.00	None	None
2009	\$177,981,016.00	None	None

That there is a deficiency in estate tax due from petitioners in the following amount:

Date of Death	Estate Tax Deficiency	Penalty pursuant to I.R.C. § 6662(a)
3/13/2009	\$152,490,896	None

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That there are deficiencies in generation-skipping transfer tax due from petitioners in the following amounts:

Year	Generation-Skipping Transfer Tax Deficiency
2008	\$2,329,050.00
2009	\$46,275,432.00
Date of Death: 3/13/2009	None

(Signed) David Gustafson  
Judge

Entered:  -6 2015

\* \* \* \* \*

It is stipulated that the following reflects petitioners' estate and generation-skipping transfer (GST) tax liability for transfers reported on Form 706 (United States Estate (and Generation-Skipping Transfer) Tax Return) (Date of Death 3/13/2009 period):

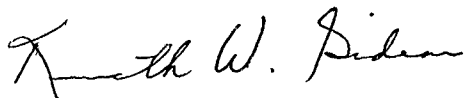
Assessment on Form 706	
Estate tax	\$139,411,144
GST tax	\$29,071,193
TOTAL	\$168,482,337
Deficiency (to be assessed)	
Estate tax	\$152,490,896
GST tax (overassessment)	(\$450,000)
TOTAL	\$152,040,896
Revised Liability	
Estate tax	\$291,902,040
GST tax	\$28,621,193
TOTAL	\$320,523,233

It is hereby stipulated that the Court may enter the foregoing decision.

It is further stipulated that interest will accrue and be assessed as provided by law on the deficiencies and additions to tax due from petitioners.

It is further stipulated that, effective upon the entry of this decision by the Court, petitioners waive the restrictions contained in I.R.C. § 6213(a) prohibiting assessment and collection of the deficiencies and additions to tax (plus statutory interest) until the decision of the Tax Court becomes final.

WILLIAM J. WILKINS  
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Date: June 24, 2015

Date: 6-26-2015