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property acquired by gift is the donor's basis plus an appropriate portion of any gift tax paid on the transfer. Since no gift tax was incurred (probably due to the application of the unified transfer tax credit), the Johnsons have an income tax basis in the Teton tract of \$50,000 (i.e., the father's basis).



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are married and file a joint return. The return for 2012 included a Form 2106 for each of them.

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specified in his will that his nephew John  
should serve as executor of Fred's  
estate. John received \$10,000 for  
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