

SECTION VIII PROBATE LAW

[For a more detailed discussion of Probate Law topics, see the Ohio State Bar Association's legal handbook for citizens, The Law & You, Part 9.]

The probate division of the court of common pleas (often referred to simply as the “probate court”) in each of Ohio’s 88 counties is one of the busiest in the court system. The first and best-known duty of this court is administering the estates that are left behind when people die. Such administration includes, among other things, payment of the decedent’s taxes and debts and the transfer of all probate estate property to the appropriate individuals or entities.

The probate division is also responsible for protecting people who need care, safeguarding personal and property rights, and supervising people in positions of trust. In performing those duties probate courts handles:

- the issuance of marriage licenses;
- adoption;
- appointment of guardians to care for children and other persons who cannot care for themselves or their property;
- proper care and treatment for the mentally ill, mentally retarded, or persons suffering from developmental or physical disabilities; and
- name changes.

Protecting individuals in need of care

Some people need special protection, including children who are orphaned, parents who are unable to care for their children and individuals suffering from mental illness, developmental disabilities and physical disabilities. Additionally, age or illness can affect an individual’s physical ability or mental capacity, or both, including the ability to care for one’s self or one’s property. In Ohio, the probate court has the jurisdiction (the obligation and authority) to supervise the protection of minors and those with physical or mental disabilities. For example, the probate court appoints guardians for both minors and adults, manages adoptions, and the court handles applications to hospitalize persons to address apparent mental illnesses.

Safeguarding personal and property rights

When an individual dies, his or her property must be transferred to:

- the person or persons named in that individual’s last will and testament;
- heirs designated according to Ohio law, when there is no will; or
- the person(s) identified in a will substitute, such as the survivor designated in a survivorship deed, or the person designated in a payable-on-death arrangement.

Supervising those in positions of trust

Individuals serving in positions of trust, whether they are executors, administrators, guardians, conservators, trustees, attorneys-in-fact, or other persons who act on behalf of third persons, are called *fiduciaries*. Fiduciaries owe a special duty to those whose interests and property they control or manage. When, for example, an executor or administrator is appointed

to settle an estate, or a guardian is appointed to look after the affairs of a child or a person who has become incompetent, it is important that the fiduciary's conduct be supervised. Fiduciaries are in positions of trust, and historically, many types of fiduciaries act under the supervision of the probate court. They must regularly report their activities, particularly their financial activities, to the probate court. However, trustees serving under trust agreements created outside a will generally are not subject to probate court supervision.

Wills

The current owner of private property can dictate who is to be the future owner when the current owner dies. The most common device to transfer ownership upon death is a *will*, or more formally, a *last will and testament*. Increasingly, people are using *will substitutes* such as *living trusts* to transfer private property to surviving spouses, heirs or other beneficiaries without going through the probate process.

Who can make a will

Under Ohio law, any person age 18 or older who has a sound mind and memory, and is not under restraint, can make a valid will.

The requirement of *sound mind and memory* does not mean that the *testator* (the individual making the will) must be in total possession of his or her faculties. The testator's mind may be dulled by pain or sickness or enfeebled by age; he or she may even suffer to some extent from mental deficiency or mental illness. So long as the testator knows who his or her family members are, generally knows the nature and extent of what he or she owns, and understands that the document is a will, the testator has the legal capacity to make a will.

The fact that a will makes an apparently unfair or unequal distribution of a testator's property does not necessarily indicate that the testator lacked the mental capacity to make the will. A testator's will may disregard family and friends of long standing and still be valid.

The requirement that a testator not be under restraint means that testator must be free to choose to make a will and to make it the way he or she wants, and is not coerced, defrauded, or improperly influenced to do so.

Requirements for making a will

1. For a will to be valid, it must be in writing and signed by the testator, and the signing must be confirmed by two competent and impartial witnesses. (Those witnesses do not have to know the contents of the will, but only that the testator signed it voluntarily.) These basic requirements are strictly enforced, although there is some leeway in how the requirements can actually be met.

2. The will may be typed or handwritten, or the will may even be partially typed and partially handwritten. Another individual may sign the will for the testator, provided this person does so at the testator's specific direction and in the presence of the testator and the two independent witnesses. (Please note that a will does not have to be notarized.)

3. Witnesses cannot be beneficiaries under a will, meaning they cannot accept any gifts listed in a will by the testator. The reason for this rule is to make sure witnesses remain unbiased. However, if the witness is also an heir, the witness may receive a portion of the gift in the will equal to what he or she would have received as an heir. This rule affects only the particular gift; it does not mean that the entire will becomes invalid simply because a witness is named in the

will to receive a gift. However, a will would be invalid if the only beneficiaries under the will are also the witnesses to the will.

Further, a murderer cannot inherit from his or her victim, and a gift to such a murderer in the deceased person's will is ignored when the estate is distributed.

4. While people can draft their own wills, certain precise concepts and legal language must be used, to ensure that the will is valid and complete. Some do-it-yourself forms and computer programs may be adequate, but these one-size-fits-all documents often are prepared for nationwide distribution, and they may not fully conform to Ohio law or to the testator's wishes. Clearly, use of such forms does not give the testator the benefit of the interview process, and the ideas that a professional can bring to the estate planning process. Therefore, an individual should consult a lawyer about writing and signing a will. It should be noted that lawyers who draft wills are under professional limitations similar to those of witnesses. In general, the lawyer who drafts a will cannot be a beneficiary.

5. There is only one exception to the requirement that a will be in writing. An oral, or *nuncupative* will is valid to transfer personal property—not real property—under certain conditions. The conditions are:

- the will is made in a “deathbed” situation by a testator who knows he or she is dying;
- the testator states his or her will to two competent, impartial witnesses of the testator's choosing;
- the witnesses write out the will and sign it within 10 days of the testator's statement; and
- the written will is filed with the probate court within six months after the testator's death.

A testator can *modify* the terms of an earlier written will (for example, to change the beneficiary of a particular item of personal property) by making an oral will during his or her last illness, but he or she cannot *revoke* a written will by making an oral will.

A will must be probated

Ohio law states that a will cannot govern the distribution of the testator's property unless the will is filed with the probate court. Stated another way, this means that the court must admit a will to probate before it can control the distribution of a testator's property, so a will left in a drawer at home is not effective. Under the law, anyone knowing of a decedent's will is required to notify the probate court of its existence and location.

What Happens When There Is No Will?

Some individuals simply choose not to make a will, while others do not make a will because they may not want to offend their relatives, or because they believe that the distribution required by law is appropriate for their situations. Others may feel wills are important, but never get around to writing them. Some people make wills that dispose of only part of their property, while some wills are invalid in whole or in part. And finally, some surviving spouses choose not to take the share provided in the will.

In any case, when an individual dies owning property not governed by a valid will, Ohio law dictates how his or her property must be distributed.

Statute of descent and distribution

The basic provisions governing inheritance of *intestate property* (or property not governed by a will or will substitutes) are found in a law called the *statute of descent and distribution*. For the most part, the statute (*Revised Code* § 2105.06) favors the nearest relatives surviving the deceased. It provides a very detailed schedule for distribution of intestate property starting with a surviving spouse and children and continuing (if no spouse or children survive the deceased person) with other relatives according to their relationships to the deceased.

Administration of Estates

The purposes of the administration of estates are to ensure that all of a deceased individual's property is identified and assembled, that his or her debts are paid, and that the balance of his or her property is distributed to those entitled to it.

Estates subject to administration

All estates must be settled according to the standard probate procedures for administering estates, according to Ohio law. However, estates totaling \$50,000 or less (or \$100,000 or less if everything is going to a surviving spouse) may be relieved from most of the formal steps of administration when the probate court is satisfied that the deceased individual's debts will be paid and his or her property will be given to those entitled to it. Relief from administration means substantial savings in time and court costs.

Probating the will

When a person dies leaving a will (*testate*), the first step in administering the estate is to admit the will to probate. Under this procedure, the will is filed in the probate court. The court then examines the document to determine if it is a valid will. It may admit the will or, if there is some doubt about the validity, the court may order the witnesses to the will to appear and testify about the genuineness of the deceased individual's signature, or the deceased's condition at the time the will was signed, etc. If the witnesses cannot be located, their signatures may be validated by other testimony. The court will accept the will (*admit it to probate*) when it is satisfied the will is valid.

Appointing an executor or administrator

Once the will is admitted to probate, the court appoints an *executor* (named in the will) of the estate. The executor is responsible for seeing that the estate is properly settled according to law. If an individual died without a will (or if the will fails to appoint an executor who is able to serve), the court appoints an *administrator* (whose duties are essentially the same as an executor). Executors and administrators are *fiduciaries*, meaning that they are authorized to act on behalf of others and are entrusted to properly handle others' estate assets. Although the probate court is not bound to appoint the person named by the testator, the court will normally appoint that person if the person is qualified to act as executor.

For intestate estates, the court prefers that relatives of the deceased act as estate administrators, although administrators must live in the state where the estate is being settled. An appointment of an executor or administrator is complete when the appointee accepts, acknowledges his or her duties and liabilities and posts a bond for the faithful performance of those

duties. The purpose of the bond is to protect the estate's beneficiaries and creditors against the possibility that the executor or administrator will not honestly administer the estate.

Wills often contain a provision specifically asking the court to dispense with the bond for estate executors, indicating a certain level of trust in the executor named in the will to faithfully perform the necessary duties. And while the court is not bound by such a request, it will usually grant it. If a bond is required, the premium is paid out of the estate's assets. When the appointment is complete, the court will send the executor or administrator a written authorization to act on behalf of the estate. This authorization is called *letters testamentary* or *letters of authority* when issued to an executor and *letters of administration* when issued to an administrator.

When an executor or administrator dies, becomes ill, otherwise is unable to complete his or her duties, or does not properly perform those duties, he or she must be replaced. A successor or replacement executor is often named in a will. If the will does not name a successor, or if individuals named in the will cannot serve or are not suitable to serve as executor, the court will name an individual to perform those duties (also called an *administrator, W.W.A.*, or *administrator with the will annexed.*)

Finding, assembling and appraising the estate property

The first duties of the executor or administrator are to locate all estate property, take an inventory of the property and, if necessary, have the property appraised or valued by one or more impartial appraisers. Although professional appraisers are not required if the property is easy to value (stocks, bank accounts, etc.), their services are required when the estate includes real estate, jewelry, antiques, etc. When the inventory and appraisal is complete, it is filed with the probate court.

Most estates include non-probate assets. These assets include insurance policies, joint and survivorship and payable-on-death (POD) accounts, transfer-on-death (TOD) accounts, and deeds and securities or pension plans with named beneficiaries. The proceeds of these assets are part of the *taxable estate* for estate tax purposes, but generally need not be listed in the inventory filed with the court.

The executor or administrator also has other duties. For example, the deceased may have been involved in a lawsuit as a plaintiff or defendant at the time of death, or the deceased (or the estate) may have a legal claim or cause of action against another party. The executor or administrator must see that the pending lawsuit is prosecuted, defended, or settled. Similarly, where the deceased had a claim or cause of action, which was not asserted, or only partially asserted, the executor or administrator must completely assert the claim and, if necessary, file a lawsuit in a timely manner. For example, if the deceased was killed in a traffic accident, the executor or administrator may have to file a lawsuit to collect damages for wrongful death. In addition, the executor or administrator must pay legal debts, taxes, costs, etc., from the estate's assets, and must distribute the assets of the estate to the proper person(s) or entity(ies).

Paying debts, taxes, costs and other expenses

The executor or administrator must determine what, if any, debts the deceased owed. Creditors have one year after the deceased's death to present claims against the estate. These claims should be sent to the executor or administrator by certified mail. Any claim not made within one year is barred forever.

Debts of the estate may include debts the deceased incurred before death, or debts incurred by the estate, such as utility bills, salaries and other expenses for maintaining estate assets. Examples of common estate debts are hospital and funeral expenses. Other obligations of the estate occur following death, such as probate court costs, attorney fees, appraiser fees and the allowance the executor or administrator may take for his or her services, and sometimes, depending upon the value of the estate, estate taxes.

Certain debts have priority. Generally, taxes, funeral expenses and costs and expenses of administering the estate must be paid first. Usually, debts, costs and expenses will be paid out of cash in the estate. If there is not enough cash, it will be necessary to sell some of the estate property. Personal property will be sold first. If there is not enough personal property, real property (house/land) will be sold. The sale of personal estate property may be conducted in various ways. The sale might be a public or private sale of individual items, or it might be some form of auction. Unless the decedent authorized the executor to sell assets, the probate court must grant permission to conduct a sale.

Distribution of estate assets

When all debts, taxes, costs and expenses have been paid, the balance of the estate must be distributed to either the individuals named in the will or, if there is no will, to those identified in the statute of descent and distribution. Distribution may be in cash or *in kind*, if the will authorizes the executor to distribute in kind, or if the administrator of an intestate estate gets court permission to do so. In-kind distribution is the transfer of something in particular to a beneficiary. For example, the will may state that the deceased's daughter is to receive a wedding ring and a silver tea service. If a sale is not necessary to obtain funds to pay debts, taxes, costs and expenses, or to obtain the necessary cash to pay all the heirs, the executor or administrator may transfer the wedding ring and tea service directly to the daughter. Sometimes a will explicitly authorizes the executor to make distribution in-kind. The executor or administrator will usually consult the heirs to determine if they want cash or the particular property.

When authorized by the probate court, partial distribution of the estate property may be made to one or more heirs before the estate is completely settled and closed. Partial distribution is often made when the property involved is such that it should not go unused until the estate is settled (automobiles are often transferred under a partial distribution because they lose their value quickly and may suffer if not driven). Also, partial distribution is common in large estates, which may remain open for some time. Partial distribution, however, should not be made unless the administrator or executor is sure enough property will be left in the estate to pay debts, taxes, costs and expenses.

The administrator or executor must notify those who receive partial distribution of estate assets—personal property, real property, cash, or cash developed from the sale of estate assets—which they may have to return these assets, or their value, if funds are needed to satisfy a claim against the estate. For example, creditors have one year to make a claim against an estate. If a partial distribution is made before the one-year deadline and then an unexpected large claim is made against the estate, beneficiaries of the partial distribution may have to return the amount or its value so that the claim can be paid.

Accounting of estate assets

When the estate is closed, the executor or administrator is required to file an account showing the estate assets, income, costs, expenses and distribution. If settling the estate takes more than

15 months, the executor or administrator may be required to file one or more interim accounts, plus a final account. When the probate court approves the final account of an executor or administrator, some courts will explicitly release the executor or administrator from his or her fiduciary duties.

Health Care Planning

While advanced medical techniques have made it possible to prolong the lives of individuals with health conditions, they also raise practical, moral and legal questions. Concern for these life-and-death issues, and the burden and potential liability they place on the family and medical providers, has led to the development of various legal devices. The *health care power of attorney* and the *living will* are among these devices.

• Durable powers of attorney

The word “attorney” simply means *representative agent*. A *power of attorney* is a document that appoints someone as an agent, either for limited purposes or for very broad, all-inclusive purposes.

Generally, when someone becomes incompetent (for instance, when injury, age or a condition such as Alzheimer’s disease takes away the person’s ability to handle his or her own affairs and make medical decisions), any power of attorney that he or she has previously executed becomes null and void.

However, a power of attorney can be drafted in a way that it remains valid if it includes a provision specifically stating that it should not be terminated even after a person becomes incompetent. Such a provision makes it a *durable* power of attorney. One type of *durable power of attorney* is intended to permit an agent to make health care decisions if the person signing the power of attorney becomes sick or injured.

• Health care power of attorney

The health care power of attorney authorizes another person (the *attorney-in-fact* or *agent*) to make health-care decisions for a person. The individual establishing the power of attorney grants this power knowing that at some time in the future he or she may not be able to make such decisions. That person gives the agent directives on what to do.

Though the agent may be given full power, the law imposes certain restrictions. The health care power of attorney must be:

- executed by a competent adult;
- signed and dated by the person granting the power;
- witnessed by two disinterested and legally competent individuals or acknowledged before a notary public who will attest the individual appears to be of sound mind and not under or subject to duress, fraud, or undue influence.

A health care power of attorney becomes effective when the individual’s physician determines he or she has lost the capacity to make informed health-care decisions.

• Living will

The living will is an individual’s (*declarant’s*) own statement and choice about the specifics and extent of treatment he or she wishes to receive when he or she is no longer able to make those decisions. The living will does not appoint another person to make these decisions.

The individual can state that the living will is applicable when he or she is in a *terminal condition*, a *permanently unconscious state*, or both, and cannot express his or her own wishes about health care. As with the health care power of attorney, a living will has certain limitations. A living will becomes operative only when:

- the attending physician and a second physician determine the person is in a terminal condition or a permanently unconscious state;
- the attending physician determines the person is not able to make informed decisions regarding treatment, and there is no reasonable possibility that he or she will regain the capacity to make these decisions.

Any competent adult may execute a living will and the formalities are the same as those of a health care power of attorney.

Anyone interested in a health care power of attorney or a living will should review the forms for each developed by the Ohio State Bar Association with the Ohio State Medical Association, the Ohio Hospital Association, the Ohio Osteopathic Association and the Ohio Hospice & Palliative Care Organization. The forms conform to the requirements of the law and are available from the Ohio Hospice & Palliative Care Organization through its Web site at <http://www.hospiceoh.org/home>. It is not necessary to use the standard forms. However, for either document to be valid, it must include certain specific language spelled out in the *Ohio Revised Code*. Most physicians and attorneys have copies of the standard forms.

• **DNR orders**

In medical circles, the term *DNR* stands for *Do Not Resuscitate*. A DNR order is a physician order written into a patient's medical records that says cardiopulmonary resuscitation (CPR) is not to be administered. Doctors are required by their code of ethics to do everything they can to keep a patient alive, unless (a) the patient will not be able to recover any kind of meaningful life, and (b) the patient specifically requests that he or she not be revived in the event of a catastrophic illness.

A person can obtain a DNR order by asking his or her physician to write such an order. If, after consulting with the person, a physician determines that both of the necessary conditions exist, the physician will write the DNR order into the person's medical records. It will go into effect immediately.

A person also can pre-authorize a physician to write a DNR order in the event that he or she becomes terminally ill or permanently unconscious. A person may use the following two documents to authorize and request that his or her physician write a DNR order:

- a living will; or
- a health care power of attorney authorizing an agent to request such action.

It is important to understand, however, that a person's *authorization* or *request* does not constitute an actual DNR order; and that such an order is actually in place **ONLY** when a physician has specifically written a DNR order into the patient's medical records at the time of the patient's terminal illness or permanent unconsciousness.

Because a living will takes effect only if and when a person is terminally ill or in a permanently unconscious state, a DNR order that is authorized by a living will cannot be issued until the person is determined to be so afflicted in the opinion of two physicians, one of whom must be a specialist. Similarly, a person may give an agent the authority, through a health care

power of attorney, to direct a physician to issue a DNR order—but that power of attorney takes effect only when the patient is unable to communicate his or her own wishes and is in a terminal condition or a permanently unconscious state according to the opinions of two physicians.

Other Duties of the Probate Court

Commitment of the mentally ill and retarded, appointment and supervision of guardians, supervision of adoptions, and the issuance of marriage licenses are among other important duties of the probate court.

Commitment of the mentally ill or retarded

When individuals suffering from mental illness or mental retardation pose a danger to themselves or others or need special care that they refuse or are unable to get for themselves, they may be brought before the probate court for the purpose of committing them to a hospital or institution for care or treatment. The probate judge may commit such an individual to a public or private hospital or institution only after carefully assessing the evidence of that person's mental status.

Guardianships

A *guardian* is an individual appointed by the probate court to be responsible for another person, or for another person's property, or both. (The individual for whom the guardian is appointed is called the *ward*.) The basis for appointment of a guardian is a disability on the part of the ward in the handling of his or her affairs. The disability may be due to youth, advanced age, mental condition or physical condition. A guardianship may be voluntary (that is, the guardian is appointed at the ward's request) or it may be involuntary. A guardian is a fiduciary and must take charge of his or her ward's property and give a periodic accounting of the ward's condition and financial affairs to the probate court.

Ohio allows the probate court to appoint *limited guardians* and *conservators*. In general, where a person is incompetent, but the nature of what he or she owns or his or her personal situation does not require the guardian to perform all of the duties of living, the court can appoint a *limited guardian* to perform only those functions that are necessary. This might be the case, for example, where a person has only an interest in real estate that needs to be managed, but the cost and mechanics of his or her personal care is being covered by a spouse. In such a case, the court might appoint a limited guardian who is only responsible to take care of the real estate, and does not have to handle other affairs; a family member or friend might be willing to assume this kind of limited duty, but not other duties that a guardian normally would have to perform.

Where an individual is mentally capable but physically infirm, the court can appoint a *conservator* to assist the individual in handling his or her affairs, either temporarily or permanently. Where a conservatorship is established, the judge sets forth the particular duties that the conservator is to perform. Thus, if someone were injured in an automobile accident and were in a full body cast for four months, the court might appoint a conservator to make deposits, sign checks, handle mail, and do other day-to-day things (with input from the injured person) until the cast was removed and the injured person was again able to resume control.

The court also may appoint an *interim guardian* or an *emergency guardian* in special situations such as a temporary disability, or until a full hearing can be arranged to determine whether a full guardianship is necessary. Interim and emergency guardians only serve for short periods. Under the law, the court must take the “least restrictive alternative” in establishing the appropriate care for the ward.

Adoptions

Adoption is the legal method by which a single adult, a husband and wife, or life partners gain full responsibility for rearing and caring for someone else’s minor child. Through adoption, the child legally becomes the child of the adoptive parent or parents following approval by the probate court.

The probate court evaluates the prospective parents (or parent) to determine if the proposed adoption is in the child’s best interest. If so, the probate court approves the adoption. A child of any age up to 18 can be adopted. (Under certain circumstances a disabled adult can be adopted.)

Adoptions occur in various situations. A stepchild may be adopted by his or her stepparent; orphans, abandoned children, children placed for adoption by their parents, and children whose legal relationship with their parents has been ended by a court also may be adopted.

Marriage licenses

The probate court supervises the issuance of marriage licenses. In summary, the probate court will not issue marriage licenses to a prospective married couple if either:

- is underage;
- is under the influence of alcohol or a controlled substance at the time of application; or
- suffers from a communicable form of syphilis.

Blood tests are not required to obtain a marriage license in Ohio. If an applicant is underage, a license can be issued if appropriate parental consent is provided and the court is satisfied that suitable counseling has been received. If a girl is under 16 and pregnant, the juvenile court may grant permission to marry.

Web Links

OSBA’s *Law You Can Use* articles:

<http://www.ohioabar.org/conres/lawyoucanuse/article.asp?ID=237> “Estate Tax Relief Does Not Reduce Need for Planning”

<http://www.ohioabar.org/conres/lawyoucanuse/article.asp?ID=223> “Forming Agreements Can Protect Same-Sex Couples”

<http://www.ohioabar.org/conres/lawyoucanuse/article.asp?ID=191> “New Property Deed Avoids Probate”

<http://www.ohioabar.org/conres/lawyoucanuse/article.asp?ID=249> “New Law Affects Probate Process”

<http://www.ohioabar.org/conres/lawyoucanuse/article.asp?ID=240> “New State Law Sparks Interest in Trust Options”

<http://www.ohiobar.org/conres/lawyoucanuse/article.asp?ID=226> “Unmarried Couples Should Get Legal Protection”

<http://www.ohiobar.org/conres/lawyoucanuse/article.asp?ID=236> “New Forms Simplify Health Care Planning”

OSBA’s *LawFacts* pamphlets:

<http://www.ohiobar.org/conres/pamphlets/article.asp?ID=1> “Administering an Estate Without a Will”

<http://www.ohiobar.org/conres/pamphlets/article.asp?ID=10> “Guardianships”

<http://www.ohiobar.org/conres/pamphlets/article.asp?ID=12> “Living Trusts”

<http://www.ohiobar.org/conres/pamphlets/article.asp?ID=17> “Probate”

<http://www.ohiobar.org/conres/pamphlets/article.asp?ID=19> “Wills”

<http://www.ohiobar.org/conres/pamphlets/article.asp?ID=13> “Living Wills and Health Care Powers of Attorney”

<http://www.ohiobar.org/conres/pamphlets/article.asp?ID=25> “DNR Orders”

From Findlaw.com:

<http://consumer.pub.findlaw.com/newcontent/willsestates/content.html> Guide to wills and estates

<http://www.findlaw.com/01topics/31probate/index.html> “Wills, Trusts, Estates and Probate” page

From Hieros Gamos:

<http://www.hg.org/estate.html> “Estate and Trust” page

From Nolo.com:

http://www.nolo.com/category/ep_home.html?t=0030LFNAV03202000 “Wills and Estate Planning” page

From Cornell Law School Legal Information Institute:

http://www.law.cornell.edu/topics/estate_planning.html

http://www.law.cornell.edu/topics/estates_trusts.html

From “It’s Legal” Web site:

<http://www.itslegal.com/infonet/wills/Estate1.asp>

<http://www.itslegal.com/infonet/estates/estatemain.asp>