

1st Ethical Charitable Trust

Research Paper on: *Islamic Wills & Death Tax Planning*

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www.1stethical.com

All praise is for Allah, Creator of the Heavens and the Earth, and owner of the Day of Judgement. We bear witness there is none worthy of worship except Allah (SWT), and we bear witness Muhammed (SAW) is his messenger.

A. INTRODUCTION

Many can speculate as to why Islam has placed such emphasis on both the laws of inheritance and making a will. One could argue it prevents family conflicts on death, others may feel it represents a means via which needy relatives can benefit from a wealthy family member. Whatever Allah (SWT)'s wisdom is, it has been praised internationally from various quarters. Consider the following analysis of the inheritance laws by a leading British University Professor:-

"The Muslim law of inheritance comprises beyond question the most refined and elaborate set of rules for the devolution of property that is known to the civilised world"

Professor Almaric Rumsey, King's College, London

The Shariah of course states in no uncertain terms the importance of making a will. In the Muwatta of Imam Malik, we find what is arguably the most commonly quoted Hadith on this subject;

*"It is the duty of a Muslim who has anything to bequeath not to let **2 nights** pass without writing a will"*

Narrated by Ibn Umar (contained in Muwatta)

Ibn Umar then noted that 'not one night has passed without me having my will with me'.

We also find the following compelling Hadith purporting the importance of making a will:-

"A man may do good deeds for seventy years but if he acts unjustly when he leaves his last testament, the wickedness of his deed will be sealed upon him, and he will enter the Fire. If, (on the other hand), a man acts wickedly for seventy years but is just in his last will and testament, the goodness of his

deed will be sealed upon him, and he will enter the Garden."

(Ahmad and Ibn Majah)

With such compelling instruction in Shariah, one would expect every adult Muslim to give priority to ensuring he/she makes a will. Unfortunately though as with so much in our faith these days, Muslims have largely neglected the *Sunnah* of making a will.

This apathy is compounded by two additional factors for Muslims who reside in the UK. Firstly, the UK tax authorities impose a death tax of a whopping 40% on assets held on death, over a certain threshold. (£275,000 for tax year 2006/2007) Secondly, if one passes away without a valid Will in place, English Law dictates the 'Law of Intestacy' will apply, which effectively distributes assets in a pre determined, unIslamic fashion to the heirs. Invariably this predetermined distribution will not be tax efficient and often will be contrary to both the wishes of the family of the deceased as well as contrary to Shariah.

There are also practical considerations concerning Islamic rites of burial such as janazah (funeral prayer), ghusl (ritual washing), kafn (burial shroud), dafn (burial not cremation) along with any wasiyyah (bequests) such as avoiding post mortem etc. and also fidya (compensation for missed fasts / prayers etc.) to consider.

All of the factors above make the preparation of a valid Will not just an Islamic obligation, but also a vital action required to mitigate tax, protect one's assets, ensure one's wishes are followed after death, and finally ensure the prospects of family disputes are minimised.

The aim of this chapter is to explain further the key aspects involved with preparing a Will from a shariah, legal and tax perspective. We will then look at solutions, which have successfully managed to seamlessly intertwine legal, tax and shariah concerns.

B. SHARIAH CONCERNS

There are many practicalities in terms of ensuring one is given a Muslim burial. It is not our intention to go through these per se. Muslims have though, for generations documented any wassiyah and fidya in writing and this type of Will is one which the Companions of the Prophet (PBUH) used to possess. Indeed the famous hadith quoted before and mentioned again below refers specifically to wasiyyah (bequests)

*"It is the duty of a Muslim who has anything to bequeath no to let **2 nights** pass without writing a will"*

Narrated by Ibn Umar (contained in Muwatta)

Historically, bequests (wasaiyyah) were exhortations from the deceased to family and friends to take heed from the passing of a loved one and accordingly encourage them to better prepare for their own death, as well as advice on specific issues. In contemporary times, especially when one is living in a non Muslim country, bequests take on even greater importance.

As part of a bequest, one should be very clear on the precise details of burial and express a desire to have a Muslim funeral encompassing ghusl (washing), kafn (shroud), janazah (funeral prayer) and dafn (burial in a Muslim cemetery).

Furthermore, unIslamic cultural traditions (should as flying the body abroad for burial) should be rejected by stating one is to be buried as soon as possible after death, in the cemetery closest to one's actual place of death, along with a preference to avoid post mortem examination if possible. In this regard, body scans may be performed as a legally acceptable alternative to post mortem. Body scans can diagnose the cause of death without the need to actually cut open the body, thereby better adhering to Shariah. These scans however, do cost approximately £2,500, hence the wasiyyah should ask for this cost to be deducted from the assets of the deceased.

In so far as distribution assets, Shariah Law initially requires any debts owed to others by the deceased to be fully cleared. If the assets are insufficient to clear debts fully, then these debts cannot be transferred to the heirs under Shariah. The heirs however, are strongly advised to settle the debts of their own free will, if affordable, as these debts will have to be otherwise accounted for by the deceased on the Day of Judgement.

After any outstanding debts have been settled, the costs of the funeral itself can be deducted from the value of the assets. Scholars typically allow only the costs of the kafn and dafn to be deducted. There is a difference of opinion over where the costs of the body scan can be deducted if this is not specifically expressed in the Will.

Once the debts and funeral expenses have been settled, Shariah allows the deceased to bequeath upto $\frac{1}{3}$ of his/her estate to whomever they wish, on condition the recipient is not someone entitled to a share from the remaining $\frac{2}{3}$ rds. It is not compulsory to use this $\frac{1}{3}^{\text{rd}}$ and any amount up to $\frac{1}{3}$ can be used. We will look at how the $\frac{2}{3}^{\text{rd}}$ s are allocated later.

Regarding the $\frac{1}{3}$, the costs of the body scan can be taken from this share, assuming the cost of the scan is less than $\frac{1}{3}$ of the value of the assets. Typically, the $\frac{1}{3}$ of assets also represents an opportunity to assist a poor relative who otherwise would not qualify for a share. If one has outstanding compulsory prayer (salaah) or fasts (saum), then a request for compensation (fidya) for these can also be made from the $\frac{1}{3}^{\text{rd}}$.

The 1/3 of assets is also a good opportunity to benefit a close non-Muslim relative or friends. Please note non Muslims **cannot** inherit from the remaining 2/3 estate. Usamah reported that the Prophet (SAW) said

'The followers from 2 different religions may not inherit from each other'

Recorded by Abu Dawud

As for the principle of 1/3, it is derived from the occasion where Sa'd Bin Abi Waqqas was struck by severe illness in Makkah. With death on his mind, he asked the Prophet (SAW) how much of his vast wealth to bequeath as a gift. Sa'd only had one daughter who could be an heir in accordance with Shariah principles. The Prophet (SAW) agreed on 1/3 sighting the following as reasoning – *'You had better leave your inheritors rich after you than leave them as a burden, begging people'*. The Hadith is found in Bukhari.

On the basis of this hadith the scholarly consensus is a maximum of 1/3. (Many scholars hold that 1/4 is more preferable, but agree that 1/3 is the maximum permissible)

Gifts from the 1/3rd can also be given to Muslim charities either as outright donations of *Waqf* or as a form of Sadaqa Jariyya with the intention they will benefit the deceased in years to come. There are many charities who operate this principle in the U.K. Contact details for these can be found in the Muslim Directory. Gifts made to UK registered charities are also exempt from inheritance tax.

HEIRS TO THE ESTATE

After any gifts from up to 1/3 of the assets have been distributed (if applicable), the heirs to a Muslim's estate as defined in Shariah can be classified as follows:

- 1) **Fixed Share Inheritors** – These are heirs for whom Surah Nisa has made an explicit percentage provision eg wife (1/4 or 1/8, dependent upon children), Husband (1/2 or 1/4 dependent upon children) etc.
- 2) **Residuary Inheritors** – These are heirs whose exact percentage is not fixed, but rather receive the balance of an estate once the fixed shares have been calculated. Examples of these are sons and daughters (usually).

The above types of heirs and their respective percentages are meticulously dealt with in the following quran ayah:-

Fixed share Inheritors

Allah has decreed the shares of a deceased's offspring and parents in the following *ayah* (*Surah Nisa v11*):

Allah instructs you concerning your children's (inheritance): a male receives a share equal to that of two females. But if they (the children) are only women, and are more than (or equal to) two, their share is two thirds of that which he (the deceased) had left. And if there is only one woman, her share is half (of the estate). And for his parents, each one's share is a sixth of that which he left if he had children. But if he had no children, and the parents inherit from him, the mother's share is one third. And if he had siblings, the mother's share is a sixth. (These distributions should be done) after the payment of any bequeathals that he may have made or debts (that he may have had). Your parents and offspring – you do not know which among them are nearest to you in benefit. (These shares are) an ordainment imposed by Allah. Indeed, Allah is Knowing and Wise.

The *ulama* derive many important instructions from this *ayah*, the most relevant of which to our discussion are the following:

1. The debts and bequests are taken out of the estate before dividing the rest among the heirs.
2. A deceased's offspring share in his estate, a son receiving twice as much as a daughter. This is done after taking out any ordained shares.
3. If the deceased's offspring are only females (two or more), they receive two-thirds of the estate, which is then equally divided among them.
4. If the deceased is survived by only one daughter, she receives one half of the estate.
5. In the presence of children, the parents receive one-sixth each.
6. In the absence of children, if the deceased leaves brothers or sisters – full paternal, or maternal, then the mother receives one-sixth.
7. In the absence of children and siblings, the mother receives one-third.

Spouses and Maternal Siblings

The following *ayah* (*Surah Nisa v 12*) deals with the share in the inheritance of the spouses and maternal siblings:

You receive one half of that which your wives leave if they have no child. If they have a child, you receive one fourth of what they leave – after payment of any bequeathals that they had made or debts (that they had). And they receive one fourth of that which you leave if you have no child. If you have a child, they receive one eighth of what you leave – after payment of any bequeathals that you had made or debts (that you had). If the man or woman whose inheritance is in question has neither ascendants nor descendants, but has a (maternal) brother or sister, each one of them two receives a sixth; and if they were more than two, they share a third – after payment of any bequeathals that had been made or debts (that are owed), and that are not intended to cause harm (to the legal inheritors). This is a commandment from Allah; and Allah is ever Knowing and Tolerant.

Amongst the instructions that we derive from this *ayah* are the following:

1. A husband receives one-half of his wife's estate if she does not have any offspring. Otherwise, he receives one-fourth.
2. A wife is a woman who was married to the deceased when he dies, or that was divorced by him a non-final (third) time and had not completed her *'iddah* (waiting period). If there is more than one wife (maximum four) for a deceased, their share is divided equally among them.
3. The wives receive one-fourth of their husband's estate if he does not have any offspring – from them or other women, immediate or grandchildren, otherwise, they receive one-eighth.
4. There is a consensus among the *ulama* that the brothers and sisters mentioned in this *ayah* are the maternal siblings, because the shares of the other siblings are mentioned in the *ayah* at the end of *Surat an-Nisa* (4:176).
5. The shares of males and females of the same rank (brother and sisters, uncles and aunts, sons and daughters, etc.) are such that a male receives twice as much as a female.
6. The maternal siblings are the only exception to the above rule. If there is only one maternal sibling, he (or she) receives one-sixth. If there are two or more, they share one third.

Inheritance rules can get incredibly complex, once we go beyond the scope of most scenarios and delve into half brothers and agnate relatives, which are family relations which occur when a man has families with multiple wives. It is beyond the scope of this paper to delve into such complexities. One is advised to contact a local scholar to establish the shares of the heirs, or to log onto the website displayed below.

RULES SUMMARY

There are 6 simple rules which if borne in mind will allow any individual to calculate shares probably 90% of the cases that occur. The rules are as follows:-

1. Wife receives $\frac{1}{8}$ or $\frac{1}{4}$ of husband's estate, with or without children respectively.
2. Husband receives $\frac{1}{4}$ or $\frac{1}{2}$ of wife's estate, with or without children respectively.
3. Mother and father receive $\frac{1}{6}$ each if client has children. If client has no children, then mother get $\frac{1}{3}$
4. Sons get twice what daughters receive of the residual estate after fixed share inheritors receive their shares.
5. If 2 or more daughters exist, they receive $\frac{2}{3}$ of the estate. One daughter alone receives $\frac{1}{2}$ the estate.

The following link accesses a computer package which will instantly work out your heir's entitlement – www.islamicsoftware.org/irth.html

C. PRACTICAL EXAMPLES

Try the following example to confirm your knowledge of the basic principles.

1. Imran married to Rehana, Imran passes away with his Mother still living and 1 child, a boy. Estate divided into 24 parts, 3 to wife ($\frac{1}{8}$), 4 to mother ($\frac{1}{6}$) and 17 parts to Son.
2. Jameel married to Rizwana, Jameel passes away with no mother but 2 children, a boy and girl. Estate again divided into 24 parts with Wife receiving $\frac{3}{24}$ ($\frac{1}{8}$) whilst children share in ratio of 2:1. Boy receives $\frac{14}{24}$ parts and girl gets $\frac{7}{24}$ parts.
3. Try your own scenario and then double-check it with the above link.

SUMMARY OF SHARIAH PRINCIPLES

The above principles are clearly not recognised by UK law. To overcome this issue, 1st Ethical recommend all clients prepare wills which contain within them trusts into which all assets are placed automatically on death. These trusts are then controlled by Trustees who are appointed by the deceased in his or her lifetime. It is of crucial importance the trustees are honest and possess integrity as they will be responsible for distributing assets. It is also possible for spouse and other heirs to be trustees.

The trustees are guided by a legal document known as a 'letter of wishes' whereby the deceased can advise them how to distribute assets. This letter of

wishes clearly indicates the trustees must have primary regard for shariah when distributing assets. This mechanism allows shariah concerns to be addressed in a legally valid manner.

We can now look at the legal consequences of not having a will on place before addressing inheritance tax concerns.

D. LEGAL CONCERNS - THE LAWS OF INTESTACY & PROBATE

If somebody dies without having made a will, the laws of Intestacy apply. These say that the first £125,000 plus chattels are given to the wife and half the remainder of the estate is placed in Trust giving the wife a right to income for life. On death the assets pass to children if they are above 18. If not then assets are still held under Trust. The remaining half of the estate is held in Trust for the children until they are 18.

As is evident, the above approach is neither Islamic nor logical. The assets will certainly not be distributed by Shariah and worse still the children's shares may be trapped under Trust until certain time in the future. This aspect quite often involves the Court of Protection's consent when administering any of the child's assets.

It is also worth stressing the above rules will apply if there is a dispute between the inheritors, as this will lead to a legal case being pursued by one or more heirs, which in turn would lead to court involvement.

If all the heirs mutually agree on a way to share the assets, then there is no need for matters to reach the court as the family will resolve matters between them – however, this is something which no one can guarantee, especially where assets are considerable, hence we would strongly discourage simply 'hoping for the best.'

Once the death occurs, all authorities, (banks, investment companies, etc.) will freeze the assets of the deceased until such time as a probate of certificate is received by them. Please note where bank accounts are held jointly, banks will normally allow the surviving partner to continue to use the account even if one partner has passed away. This will not apply however to accounts held in sole names.

If a will has been left by the deceased, the executors named in the Will need to fill in a probate form and attend a meeting at the local family court where they will receive a probate certificate.

If the deceased did not leave a will, then normally the spouse and one or more child will need to submit a form to the local family court and apply for letters of administration. Once the application has been processed, the executors are also granted a certificate of probate.

Once the certificate of probate has been granted, the executors, upon sending a copy of the certificate to the relevant authorities will be authorised to manage the assets of the deceased with a view to transferring them into the ownership of the rightful heirs.

The process of probate can be completed in a matter of months if the assets are not large (less than £150,000) and also if there is no inheritance tax concerns. If the value of the assets is considerable, and furthermore the paperwork relating to the assets is easily traceable, then probate often take a number of years to conclude.

If there is an inheritance tax liability, the probate certificate will only be issued once the tax has been paid. Given the assets are frozen from the date of death until such time as the probate certificate has been granted, this often creates serious cash flow issues as the executors cannot afford to pay the tax without access to the assets, and are therefore compelled to take a short term interest based bridging loan from the bank. There are ways to resolve this situation and both manage the probate process efficiently from an Islamic as well as legal perspective. Please contact 1st Ethical if advice is required.

Generally speaking, those who prepare for death with a properly prepared will, as well as a folder containing details of all their assets, will leave their executors with a greatly simplified responsibility of managing the probate process, than those who do not prepare a will and do not keep a central record of all their assets.

E. INCORPORATING SHARIAH WITHIN THE U.K TAXATION FRAMEWORK

WHAT IS INHERITANCE TAX

Inheritance tax (IHT) is payable at a rate of 40% on certain assets within a deceased person's estate in excess of £275,000. (for the tax year 2006/2007) This individual allowance is revised annually and known as the 'Nil Rate Band' (NRB).

There are a number of relatively straight-forward steps which can substantially reduce or even eliminate any IHT liability, if arranged prior to death. Whilst there are many exemptions and relief's available, the following is a summary of the most relevant principles.

GIFTS

Gifts of any value, made by the deceased to the surviving spouse, before or on death, are exempt from IHT. However, these gifts may be liable to IHT on death of the surviving spouse. It is important to note that English law does not recognise the Islamic Nikkah ceremony as having legal force, if undertaken in the United Kingdom, except where those performing the ceremony have been

granted a license to issue marriage certificates. Consequently, it is important for clients wishing to use this exemption to possess a civil marriage certificate. If required, these can be obtained by attending a marriage ceremony at a local registry office. If the surviving spouse is not UK domiciled, the inter-spouse exemption is limited to £55,000.

A popular use of this exemption is to ensure on death all assets in excess of the NRB are passed to the surviving spouse.

LIFETIME TRANSFERS

Gifts of any value are deemed to be exempt from IHT, if made seven or more years prior to death. IHT is payable in full on gifts made less than three years prior to death, and on a sliding scale, on gifts made between three and seven years prior to death. Gifts in which the donor retains some beneficial interest (e.g. a house in which the donor continues to reside rent free) are considered to be 'Gifts with Reservation'. They are liable to pay IHT in full, irrespective of when the gift was made.

BUSINESS PROPERTY RELIEF

The transfer of shares in an on going business concern are exempt from IHT, if the shares have been owned for two or more years by the deceased. This relief is of crucial importance to business owners, as the vast majority of trading companies and partnerships will qualify for this relief. Investment companies, or properties, both commercial and residential, generating rental income normally do not qualify for Business Property Relief.

ANNUAL EXEMPTION

A single gift of £3,000 per annum can be made which is exempt from IHT. Any unused annual exemption can be carried forward one tax year enabling a maximum £6,000 to be gifted.

GIFTS

Gifts of any value made to a U.K. registered charity are exempt from inheritance tax (IHT).

DEEDS OF VARIATION

The Beneficiaries of an estate are able to retrospectively revise a Will after death usually for religious, family or tax reasons. In order for a Deed of Variation to be accepted by the Inland Revenue, all Beneficiaries must be over 18 and sane, and give their written consent within two years of death. Deeds of Variations are typically very costly and time-consuming.

F. ADVANCED INHERITANCE TAX PLANNING

Where a client's assets are considerable, the above rules will need to be augmented to ensure tax is mitigated. The following is a list of some of the more popular advanced techniques and typically apply to those whose assets are valued in excess of £1 Million. Quite often these methods involve some form of capital gains tax planning. Please note we have not included many of the more complex solutions and those mentioned are in summary format. No action should therefore be taken without first taking professional advice.

1) Transfers into a DT & IIP on death – This allows for assets to be transferred into a Discretionary Trust (DT) either on death. As mentioned before 1st Ethical use trust based wills to ensure shariah compliance therefore these trust are mostly used on death through applying the appropriate clause within a Will. The DT also allows assets up to the NRB, (£275,000) to be exempt from paying Inheritance Tax. Assets over this amount owned by the deceased are placed into another type of Trust, an Interest in Possession (IIP) Trust, which also allows for tax mitigation.

With regards to the IIP, technically the assets in the trust are held for the benefit of the spouse, although the trustees will only give the spouse what she is due under shariah. Consequently, once the trustees distribute the assets from the IIP, a potentially exempt transfer lasting for seven years is created on the spouse.

The DT can also be used to reduce the assets of someone who pro actively wishes to reduce the value of their estate during their life time. Typically in this scenario one is discouraged from making gifts, as gifts made to any person apart from spouse will automatically trigger a capital gains tax charge. The value of a DT is the CGT charge can be deferred by placing assets into the trust.

2) Declaration of Trust – This allows for ownership of an asset to be deemed as shared by a group of individuals rather than just the legal owner (or indeed just one individual other than the legal owner). For married couples, it crucially allows both NRB's to be applied to the value of the family home if it was initially purchased in a sole name. For example if the husband initially purchased a house now valued at £500,000, this would exceed his NRB by some £225,000. By completing a DoT on this property, which allows for half the property to be owned by his wife, two sets of NRB can be offset against the value of the property. These would be worth £550,000, which is greater than the value of the property at £500,000, thereby eliminating any tax charge.

3) Offshore Planning – this is principally the ability to hold assets in a environment where they are exempt from both Inheritance and Capital Gains Tax, and relies on one obtaining a non domicile status. These strategies are generally only for the very wealthy. If your assets are above the £5 million mark, then this may be relevant. Please contact 1st Ethical if more information is required.

4) Converting Jointly Owned assets to Tenants in Common

Many couples own their family home jointly as joint tenants. This would result in the house automatically passing to the surviving spouse on death regardless of any provisions made in the will. This situation is not according to shariah and would likely lead to a tax charge on the subsequent death of the spouse. For example if a couple owned a house with £500,000 as joint tenants and the husband dies, the house passes to his wife who is now the sole owner. On her death, a tax charge will arise.

A couple can continue to own a house jointly, but own it as tenants in common. This allows for the half owned by one partner to be included as an asset in their will on death instead of passing to the surviving spouse. This arrangement not only allows shariah to be applied to the half owned by the deceased, but also avoids a tax charge on the death of the surviving partner as their share is now worth £250,000 which is less than the Nil Rate Band.

Example

The following is a real life case study of a client with wealth exceeding £575,000 (2 Nil Rate Bands). The solution documents both the potential tax liability and then a step-by-step approach to reducing the liability and distributing the estate Islamically.

Estate Value exceeds £575,000 but not £1.5 Million

Scenario - Yusuf and Aisha are married with 1 son and two daughters. Yusuf's Estate value is £920,000. This does not include Business property (Yusuf's Telecom's Firm which he founded and still owns) valued at £1 Million. Aisha has an estate worth £275,000. Yusuf's Personal Pension fund is worth £200,000.

Questions :

1. What is their potential IHT liability
2. How can this liability be reduced
3. How can they distribute their estate Islamically via their wills?

1. Potential IHT Liability

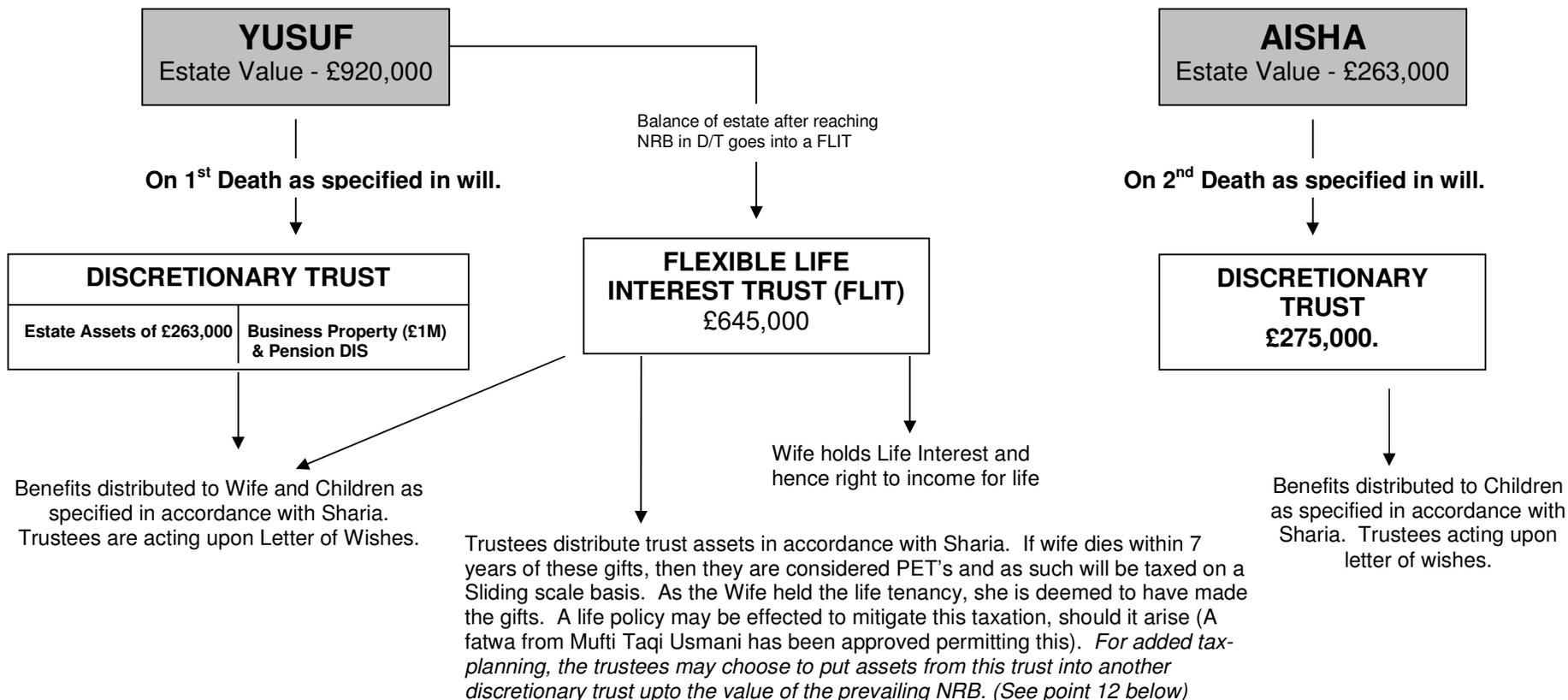
Estate Value = £920,000
 Less NRB = (£275,000)
 Taxable Estate = £645,000
IHT Liability = £645,000 * 40% = £258,000.

2 & 3. Reducing IHT liability and distributing estate Islamically

Answer – In this instance, the clients need to prepare wills in accordance with sharia and ensure 2 key trusts are inserted into the will. Firstly, a discretionary trust (see definition above) into which assets equivalent to

the Nil Rate Band will pass on death (Referred to as a Nil Rate Band Discretionary Trust) .

- Secondly a Interest in Possession Trust (IIP).
- **KEY TERM** - This is a Trust in which the surviving spouse has a life tenancy. A life tenancy simply means a right to income for life. As the wife holds a life tenancy in the IIP, all transfers to the IIP are free if inheritance tax on death. A transfer to a IIP is essentially the same as an inter-spouse exemption for taxation purposes. Naturally then, the balance above the Nil rate band on 1st death will be passed into the IIP to avoid any taxation. Please refer to the following diagram:



H. Summary

It is clearly very important for a Muslim to plan adequately for his financial affairs prior to death. The Shariah strongly supports this view. For Muslims owning substantial wealth, the Islamic philosophy however must be accompanied by sophisticated Trust based Tax planning in line with U.K Taxation Laws. Failure to achieve this may render the entire Islamic Planning void, and result in a 40% tax charge.

1st Ethical recommend Muslims utilise trust based will solutions. These are legally valid, thereby avoiding the laws of intestacy. Furthermore, by placing assets on death into trust, the trustees are able to ensure an Islamic distribution occurs. Finally, certain types of trust are effective at also mitigating inheritance tax as well as providing asset protection.

Careful drafting of one's will including the right type of shariah compliant, tax effect trusts, along with choosing honest trustees, will allow one to prepare a legally valid, tax efficient and shariah compliant will.

We pray the Almighty is pleased with the paper, and it is a means through which we can gain His pleasure. If there are any errors they are solely from ourselves, whilst any guidance can only be from Allah (SWT).

Sources:

- 1. The Islamic will – Ahmad Thomson**
- 2. Will writing and Islamic Inheritance Planning – 1st Ethical**
- 3. The Islamic Laws of Inheritance – Dr Abid Hussain**
- 4. The final Bequest – Mohammed Al-Jibaly**