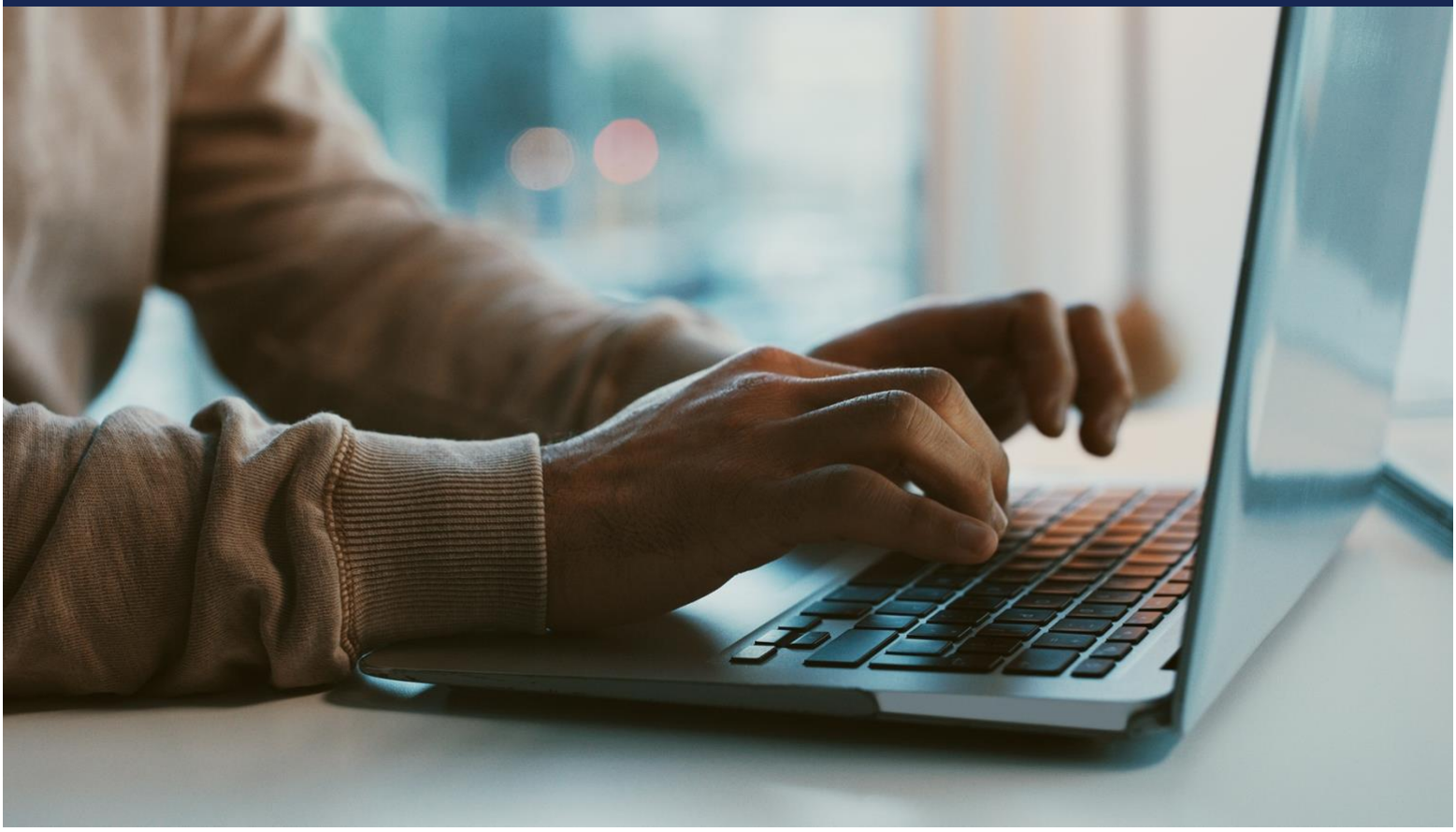
DIGITAL ASSETS AND 21ST CENTURY ESTATE PLANNING: THE REVISED UNIFORM FIDUCIARY ACCESS TO DIGITAL ASSETS ACT



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Estate Planning & Elder Law
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Digital Assets and 21st Century Estate Planning: The Revised Uniform Fiduciary Access to Digital Assets Act

by
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After years of wrangling with how to handle digital assets in the process of estate planning and settling estates, lawyers in Ohio now have tools to effectively manage and pass on digital assets as part of their clients' estate planning. Effective April 6, 2017, the State of Ohio became the 42nd state to enact the Revised Uniform Fiduciary Access to Digital Assets Act of 2015 (RUFADAA).[1] This new law was based on a set of model laws introduced by the National Conference of Commissioners on Uniform State Laws (NCCUSL). The NCCUSL is an organization of academics, lawyers, judges, and other professionals who recommend law changes for state legislatures to consider and to adopt either as-is or with changes.

It would be an understatement to say that enactment of RUFADAA was a game changer for consumers and lawyers. Prior to this law, consumers were at the mercy of each website custodian or custodian of electronic communications, about future fiduciary access to accounts of deceased or incapacitated users, and how to pass on digital assets as part of an estate plan.[2] That created unexpected challenges because there was no established way to handle digital assets, or uniformity from company to company because each could set its own rules. Nor were there guidelines for courts to follow.

Now, there is a legal blueprint for drafting Trust Agreements, Wills, and Powers of Attorney to allow your future fiduciaries access to your digital assets, and to transfer them at your death to your heirs. But if your legal documents do not comply with your state's laws on digital assets, they will be ineffective to provide your future fiduciaries access to your digital assets. The results of that can be unpredictable and costly.

If there are no Digital Asset provisions in your legal documents, or if your legal documents have provisions written before your state adopted its version of RUFADAA, then wording should be added or changed to comply with RUFADAA. Even if you live in a state that has not adopted the Act, you can still use the Act as part of your estate planning.

This paper will discuss planning for Digital Assets under RUFADAA. It will start with the basics and then work its way to RUFADAA and modern planning. It will also consider whether the RUFADAA goes far enough to address all estate planning issues with respect to digital assets, and what other steps you can take on your own.

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1 According to the website of the National Conference of Commissioners on Uniform State Laws as of October 2, 2017. As of that date, Indiana had adopted a version of the law, and Kentucky had not yet considered it.

2 The term "digital assets" is defined below.

Settling an estate used to be a predictable, routine process. Once a person died, family members would notify that person's estate planning attorney so they could begin settling the estate. Understanding the decedent's finances and property were a first step to successful and uneventful estate administration and distribution. The estate fiduciary would enter the decedent's home and review all the decedent's personal effects, books and records, and incoming mail. Sometimes the fiduciary and his or her lawyer would combine forces to piece together a picture of the decedent's financial and property status at the time of death, based on paper records of assets, accounts, incoming mail, and income tax returns. Once the estate assets were identified, the fiduciary (Trustee or Executor) could then take possession or control of the assets and begin the next step of carrying out the decedent's wishes about passing on the assets.

This is a somewhat simplified description and there are smaller steps and details that differ case by case. But the overall picture is appropriate.

Today, looking through files and incoming mail may not reveal everything that the estate fiduciary and estate lawyer need to know about a deceased person's affairs. That is because a growing amount of the essential financial and legal information affecting consumers today is not communicated or stored in paper form. Rather, it is communicated and stored electronically in digital format. "Digital" can describe information stored in online accounts ("in the cloud"), on a computer, on a tablet computer such as an iPad, on a smart phone, or on another digital media such as a USB thumb drive. Many people also pay their bills online or have regularly occurring bills paid through automatic deductions from a bank account. Paper records may not likely disclose these facts or the necessary information so that the fiduciary can manage or terminate such automatic services.

You own the contents of your electronic communications and data. Even the information necessary to access those accounts is considered your digital property. But your access to those records and data is controlled by whoever owns and maintains the website or email service where your data resides. Your pipeline to that data is the internet, including access to cloud-based electronic data and applications. There are privacy laws that apply to protect your data and your identity, which is desirable. But those privacy laws can prove to be problematic when you pass away or if you become incapacitated and someone else tries to access your protected information on your behalf.

For example, we have all experienced the frustration of trying to gain access to our information by phone, or access to our online accounts when our login name and password will not work, or where we have forgotten them. Our future fiduciaries will have the same obstacles, and also the task of convincing a custodian of electronic communications or online data that they legally have the right access to your accounts and information. If we do not properly equip them in advance, then estate settlement and management of our affairs during incapacitation can be extra complicated.

For these reasons and others beyond the scope of this paper, estate planning today must take into consideration how your future fiduciaries will access your electronic

communications, access records of electronic communications and data, and manage your accounts that are accessed only "in the cloud". This requires understanding how your future fiduciaries can lawfully access digital assets when they take over your affairs after death or incapacitation, and then executing the appropriate legal documents *now* to allow them to do their jobs without delay and court intervention, or disputes with the custodians of your electronic communications and data.

WHAT ARE DIGITAL ASSETS? DO YOU HAVE ANY?

There are legal definitions of Digital Assets, but I offer a simple explanation:

> Any information which, to access, view, use, download, or transfer, requires five things - a keyboard, a screen or monitor, the internet or some electronic connection, a login name, and a password.

In today's world it is hard to visualize life without some sort of Digital Assets, but some people claim that to be their status. Over time, the segment of our population who are not truly connected via the internet or the cloud is likely to dwindle as more and more financial institutions require customers to be connected, and if not, then to pay extra costs to continue to receive paper account statements. Another factor is that people of all generations have embraced internet usage. Indeed, both my father and my father-in-law, who died at ages 88 and 89, were both surfing the web and using email. Likewise, as our elderly age and their children and younger family members help with their care, they will rely on the internet and the "cloud" for their elders' affairs.

Furthermore, digital options for personal business continue to expand. Social media continues to grow, and consumers often use social media to record the events of their lives. Many people even rely on the internet to store photos, videos and personal family information that was once passed from one generation to the next via paper or printed media. Families who cannot access such records after the deaths of their loved ones may suffer losses dearer than money.

In addition, recent surveys indicate that the monetary value of Digital Assets globally averages between $35,000-$55,000 per individual. Thus, I believe that every consumer - even those who believe they do not have Digital Assets - should include provisions for Digital Assets in their estate plan.

Below are some examples of electronic assets you may have. The list could be expanded, and it grows every day. In no particular order, they include:

- Online financial accounts
- Email accounts through an ISP or webmail
- Social media accounts
- Online brokerage or financial accounts
- Online accounts sponsored by "brick and mortar" stores
- Online bill payment services (e.g. utility accounts, car and mortgage loans, insurance)

- Accounts, systems and data collection points accessible via username and PIN or Password. (e.g. voicemail, home or office alarm systems, cell phones, contact lists, address books)
- Credit card accounts
- ATM cards and PINs
- Loyalty programs
- E-Commerce accounts, such as Amazon, PayPal, etc.
- Tax and legal records or documents
- Domain names used in a business, websites and blogs
- Literary works, copyrighted materials
- Accounts on photo-sharing websites
- Documents and other files stored "in the cloud"
- Music, video, and eBook collections and accounts

TRACKING YOUR DIGITAL ASSETS

As already pointed out, the proliferation of Digital Assets has complicated estate planning and estate settlement processes. If your Trustee, Executor, and Power of Attorney agent cannot identify or access your digital assets, then carrying out your wishes about inheritance of your estate - or caring for your affairs if you are incapacitated - can be difficult or even impossible.

Each company that has an online presence controls your access to, and use of, the account through the internet. How does one react to and manage the differing requirements and policies of each company?

The state-by-state enactment of RUFADAA creates more or less uniform standards, which is the legal aspect of handling digital assets. Legal issues aside, the initial step in Digital Estate Planning is tracking those assets.

Planning for Digital Assets begins with making a complete list of your Digital Assets by name with your login names and passwords. (We provide our clients with a form.) Whatever form you use, store it securely so that no one can obtain it and steal your identity and Digital Assets. Make sure to keep the record in a convenient location, in case you need to update your data as it changes, or if your fiduciaries need to access it. There are online services and applications that can be installed on smart phones and tablet computers or PCs that offer various secure record-storage options. Some are better than others, so be discerning. Some will not only store and protect your login names and passwords but will also supply your credentials to websites on-demand. New products and services are offered from time to time by well-known companies with a record of customer service and longevity in the market.

THE GATEWAY DIGITAL ASSETS – EMAIL AND CELL PHONE

Your email accounts are an important Digital Asset, since they are the primary means by which you receive your account information, in lieu of paper mailings. Your fiduciary (trustee, executor, power of attorney agent) may not be able to access digital asset

information if he or she cannot get into your email accounts. Indeed, email access may be the only way to even identify financial assets in the first place, let alone access your financial data, if there are no paper statements or records.

Your email accounts are critical Digital Assets for another reason. If you lose or forget a login name or password, the account information will be recovered or reset by email. If your fiduciary cannot access the email account used when your online account was set up, which is where that password reset information will be sent, then the information is locked up. Access to that information - assuming the online account can even be identified - may require probate court involvement, which means delays and costs.

For these reasons, your email account is considered a **Gateway Digital Asset.** Access to email opens the door to other digital assets.

Also, more and more companies are relying on two-factor identification to use a website or change a lost password. That means access to your email account may not be enough. Two-factor identification involves first proving your identity on the website, and then instantly receiving a code from the website administrator to access the website as a second factor. You may receive this code via your email, a text message on your cell phone, or a phone call to a number you provide when you set up an account.

Therefore, your cell phone also acts like a **Gateway Digital Asset.** This means that you should make your cell phone accessible to your future fiduciaries, who should have your login and password.

THE FATE OF YOUR SOCIAL MEDIA AND NON-FINANCIAL ONLINE ACCOUNTS

Social media accounts are digital assets because they involve electronic communications. What happens to those accounts when you die?

There are aspects of digital assets not necessarily tied to money. Giving personal property to your heirs is different in today's world because some of our most valuable property is not tangible or physical. Instead, our personal property is often nothing more than a bunch of ones and zeroes stored on a hard drive or online.

You may, for example, have personal photographs, videos, or documents that only exist on your computer or online. Witness the popularity of Facebook, Twitter, Instagram, and other photo and video sites and applications for electronic devices. *If a loved one were to pass away, those photos, videos and other online information become priceless and irreplaceable, even though they have no economic value.*

If no one knows those photos and videos exist, or how to access them, that would be a significant problem to the estate settlement process. For younger couples, and those who are very involved in the digital world, these assets can be significant and very meaningful. They can tell a life's story, especially the pictures and videos of young children as they grow up. Transferring them after death will be difficult if you do not take adequate precautions now.

An example of an online account that may have economic value would be accounts for buying books and music. You might not buy physical books anymore. Instead, you buy the permission to use electronic copies and read them on a digital reading device such as your tablet computer or Kindle device. Over your lifetime you could accumulate thousands of dollars of literature in this fashion. How are these types of digital assets handled in estate planning? How do you leave them to your heirs?

For example, if you purchase an eBook from Amazon for use on a Kindle device, you receive a digital file that is tied to your specific Amazon account. If you buy a digital movie from Amazon, you do not even download a copy of the movie. When you want to watch the movie, you log into your Amazon account and stream the movie to your computer, TV, or mobile device.

These online purchases and numerous others that could be identified, are arguably property rights of a deceased account holder under long-established law in our country. Therefore, we should be able to pass them to our heirs through a will or bequest under a Living Trust. But the access to such property, and the rights to leave such property to heirs is controlled by the custodian of the online account. They define what happens to the account when you die.

It is not always clear what happens to social media accounts when the owner dies. Some companies have paid attention to this legal situation and implemented policies and procedures to allow customers to plan for their Digital Estate. The leading example is Google, the 800-pound gorilla of the digital world. In 2013, Google announced its new feature called Inactive Account Manager to use with all Google related accounts such as Gmail, Google Drive (online document storage), YouTube, or Google+ (a Social Media network like Facebook). To access this service, you must have a Google account, which can be created at no cost. Access your account settings and look for "Account Management". Then follow the instructions. Facebook offers a way to appoint a Legacy Contact to memorialize an account when an owner dies. (Search for "what happens to my Facebook account when I die" using your web browser.) Undoubtedly, many other websites have similar processes.

This is a different issue than access to electronic communications. The RUFADAA allows a way for future fiduciaries to access online accounts but does not override the right of a website owner to control those accounts when an account owner dies.

The importance of social media accounts is a new phenomenon, and the law has not had time to totally catch up with this development. It is up to each individual social media company to establish and enforce its own policies. Who will have access to the accounts? Can electronic purchases such as books, music, or videos, be passed to heirs? Will the company terminate the account once it learns of the death of the account owner, thus destroying the contents?

For the time being, until the law further develops, it is prudent to look at the Terms of Use or End User License Agreement for all online accounts you use for purchase of electronic media and utilize the tools they offer. It may also be prudent to include specific bequests

in wills and trusts of such media. For example, "I leave my iTunes account of music purchases to my daughter, Sally."

THE TECHNICAL STUFF, AND HOW RUFADAA HELPS

As seen, Digital Assets present an eclectic assortment of legal issues. Until RUFADAA, this area of law was like the Wild West of estate planning—a lack of applicable laws applying to these issues, and no uniformity from account to account about procedures to follow and rights of the estate of a deceased account holder.

Before RUFADAA was enacted, those issues could be especially thorny for online financial accounts for example. Suppose you have a money market account online that you set up with an online bank. There is no "brick and mortar" bank branch you can visit; the bank only has an online presence. Also, suppose you opened an online stock and mutual funds account with a company that has no physical offices for consumers to visit. Their sole presence is in the cloud.

These types of accounts are increasingly popular. You do not receive paper account statements in the mail. Your account statements are only available by email. All financial transactions are done online. Another example is the trend even for banks and financial institutions who have a "bricks and mortar" local presence to charge a monthly fee for paper account statements, but cost-free statements by email. Many consumers refuse to pay a fee for something they used to get free (paper account statements) and choose to go digital.

In short, you own the money and stocks in your accounts, but you do not own the *access* to that property. Here's why.

The Internet is the pipeline for accessing and moving your property into and out of your accounts. You do not own the account, just what the account holds. You have the right to access the accounts under what is legally called a license. You as the account holder have a *license* to use that pipeline, but companies that provide your accounts define and limit your rights, based on their Terms of Use—generally called the End User License Agreement, or EULA. EULAs are very lengthy and written in dense legal terms.

Most of us don't bother to read EULAs. But if you take the time to do so, you may be unpleasantly surprised at how limited your rights are to access your digital assets. Your license rights are typically non-assignable and terminate upon death. If you do not accept a company's terms, you cannot create an account in the first place. They are not negotiable.

If an online company learns of your death, will they shut down the account access? If so, how will your future fiduciary know what you have, and how can he or she gain access without you? Even if your fiduciary knows what online accounts you may have when you pass away, how can he or she access those assets without your email account addresses, login names and passwords? Even if they have your account credentials and can log on to your accounts, will they be *violating state and federal privacy laws and stealing your data?* This is where proper planning can help.

Returning to our hypothetical example, if you were to die or become incapacitated, how will your Trustee, Power of Attorney Agent, or Executor gain access to your online bank accounts and stock account? Assuming you made your account credentials available to your fiduciaries after your death or incapacitation, using that information could be a criminal offense. But what if the financial institution learns of your death and terminates online access? Will court litigation be necessary? How does an estate fiduciary even do her job if she cannot see what a decedent owned?

Because of these and other concerns, there was a clear need for legislation about digital assets after the death of an account owner.

THE REVISED UNIFORM FIDUCIARY ACCESS TO DIGITAL ASSETS ACT TO THE RESCUE

Thanks to the adoption of RUFADAA in Ohio effective April 6, 2017, Ohioans can provide in their legal estate planning documents for their future fiduciaries to access their digital accounts. Here's an overview of how the new law helps you plan your affairs and control you digital assets.

There are three scenarios where a fiduciary may have to act on your behalf:

1. You are unable to take care of your financial and legal affairs because you are incapacitated (e.g. a stroke that has affected your cognitive abilities, or dementia.) Your Agent under your Power of Attorney must act on your behalf and take over for you out of necessity.

2. When you wish to voluntarily give someone else the power to manage your affairs. The legal document for that is also your Property Power of Attorney.

3. Your death. The relevant legal documents at that time would be your will or your trust agreement.

The Act establishes what provisions must be in your Trust, Will, and Property Power of Attorney for your fiduciary (your Trustee, Executor, or Agent) to access and act as to your digital assets. If your legal documents meet those statutory requirements, and if the fiduciary follows proper procedures, then the company or website where your digital assets are found must comply with requests by your fiduciary.

A general overview of RUFADAA in Ohio must start with the definitions of terms used in the Act. Critical definitions for purposes of this article include:

Digital Asset is an "electronic record in which an individual has a right or interest." The record is the Digital Asset, not the contents, unless the underlying asset or liability is itself an electronic record.

Electronic means relating to technology having electrical, digital, magnetic, wireless, optical, electromagnetic, or similar capabilities. Thus, the Act applies to the internet and cloud services.

Record is information that is inscribed on a tangible medium or that is stored in an electronic or other medium and is retrievable in perceivable form.

Electronic Communication includes any transfer of signs, signals, writing, images, sounds, data, or intelligence.

Electronic-Communication Service is a custodian that provides to a user the ability to send or receive an electronic communication.

User is a person (or entity) who has an account with a custodian.

Custodian is a person who carries, maintains, processes, receives, or stores a digital asset of a user.

There are other terms used in the Act that are specifically defined, but these definitions make it clear that the Act applies to websites, email accounts, financial accounts online, social media accounts, and all types of Digital Assets discussed in this article.

The Act allows users of Digital Assets to grant legal authority to others to gain access to those Digital Assets and/or the *content* of electronic communications. This is an important distinction. For example, access to an incapacitated or deceased person's email account may be permitted so that a fiduciary can see the sender and subject lines as well as dates and times or other recipients. But the fiduciary may not view the *contents of the emails* unless the user specifically grants that permission in the legal document appointing and granting the powers of the fiduciary. That document us the user's will or trust if deceased, or Property Power of Attorney if living.

The Act expands the authority that an agent could have under a Property Power of Attorney to include dealing with digital assets and electronic communications.

Users of Digital Assets may allow or prohibit in a will, trust, Property Power of Attorney, or "other record," the disclosure of some or all the user's digital assets to a fiduciary, including the contents of electronic communications sent or received by the user.

The Act authorizes use of an "online tool" that may be offered by a custodian of digital assets under which the user can direct the custodian to disclose or not to disclose some or all the user's digital assets to a fiduciary, including electronic communications to or from the user. The directives in an online tool will supersede the authority given a fiduciary under the user's legal documents. For example, if you have an email or other online account that you use for personal or business reasons, you may not wish the contents of communications or the communications themselves to be disclosed if you were to die. Examples of online tools would be Google's Inactive Account Manager and the Facebook Legacy Contact mentioned above.

The Act requires a custodian to comply with a request from a fiduciary not later than 60 days after it is made. If the request is not complied with, the Act provides for court-ordered relief.

Now, your future fiduciaries can have the same access to and powers over your digital assets as any other asset—if your trust agreement, will, and property power of attorney include the proper terms. You can even control how much authority and access to the contents of digital assets your future fiduciaries will have. They will have the tools they need to identify and access your digital assets and online accounts so that they can properly settle your estate.

If you have digital assets that have value in and of themselves that you created and own (intellectual property), e.g. literary or audio/visual works, photographs, etc., you can pass those to heirs just like non-digital "things".

If you are receiving this article as part of the delivery of your new estate plan or estate plan update, then we have provided the appropriate language in your legal documents to comply with RUFADAA. If you have older documents that do not have wording for RUFADA, or have wording about digital assets written before RUFADAA, then your documents will not meet the RUFADAA standards and should be updated. Contact us for information.

Here are the steps to take to ensure your digital assets are appropriately addressed:

1. Include language specific to digital assets in your legal documents.

2. Create a Digital Asset Inventory as discussed above. (The form that we provide our clients is called a Confidential Record of digital assets and Passwords. This is a hard copy form that you can manually complete and modify as needed. It includes identifying information and online credentials for all digital assets.) There are websites and applications for computers and mobile devices to securely store this information.

   If your legal documents have RUFADAA provisions but your future fiduciaries do not have information about digital assets, then their jobs will be more difficult. Keeping this record will help them. Be sure to keep the original form intact and make copies to work from. If you would like an electronic copy, send us an email request and we'll reply with a Microsoft Word file attachment which allows you to interact, edit or print the form.

3. Provide a method for your future fiduciaries to access your Digital Asset Inventory after your death or incapacitation.

BEYOND RUFADAA

The introductory section of this report raised the question whether the RUFADAA goes far enough to address all estate planning issues with respect to digital assets, and what other steps you can take on your own. The law is a major step forward, but it does not address inheritance issues as to purchases made online. Examples used were book or video purchases on Amazon.com, or music in an iTunes account. These are top of mind examples, and there are surely many other such accounts. The disposition of those property rights (where you did not create the intellectual property) is not settled by RUFADAA. Until the law develops, use the online tools offered by each website, if any. To find those tools, look for options applicable at the death of the user or account owner.

THE FUTURE

Recently, one of our lawyers attended a Continuing Legal Education program at which digital asset planning was a topic. Out of a group of about a hundred lawyers and legal

professionals, we were one of only a handful who indicated they include Digital Asset powers in legal documents they prepare for their clients.

We have been working on digital assets solutions since 2011, when we first became aware of the issues. Due to the rapidly changing and fluid nature of the digital world, developments can occur quickly and randomly. Information that is current and up to date one day can become obsolete the next. Laws change, and company policies evolve. This report is intended to raise consciousness and sensitivity to the issues and the currently available solutions, based on the status of the law as of this writing.

Barry H. Zimmer

THE ZIMMER LAW FIRM, LLC January 8, 2018

ABOUT THE ZIMMER LAW FIRM

Zimmer Law Firm, LLC is a charter member of the American Academy of Estate Planning Attorneys. It is the only member firm in Southwestern Ohio. The Firm has been providing quality estate planning services since it was founded in 1993. The fastest growing demand for its services has been asset protection from the cost of long term nursing care. Whether you need an Elder Law attorney, an attorney for general estate planning with trusts or wills, or an attorney to help settle an estate, our team of qualified staff are here to help you and your loved ones.

In these turbulent times, access to an experienced lawyer to protect your estate and accomplish your goals is more important than ever. If you or your family would like a complimentary consultation to discuss your estate plan or how to protect your estate from depletion to pay for long term nursing care, call us today at **513-721-1513** or visit our website at **www.zimmerlawfirm.com**. Check our website for upcoming seminars, or learn more about the firm at www.avvo.com where you will also find testimonials from our clients. See why *Cincinnati Magazine* recognizes us as a Five Star Wealth Manager. If you would like to receive email announcements for upcoming seminars, call to be added to our seminar mailing list.

A MESSAGE FROM THE FIRM FOUNDER

The goals of Zimmer Law Firm are to make asset protection and estate planning pleasant, easy, and understandable processes for clients. We believe that planning is much more than just creating legal documents. Rather it is about establishing relationships with clients and their family by providing a continuum of services through the passages of their lives. What we do makes an important difference and we take great professional pride and satisfaction in that.

If you or your loved ones would like a complimentary consultation to review your estate plan or to implement a plan, visit our website at www.zimmerlawfirm.com or call us today at 513-721-1513 (Toll-Free 1-866-799-4050) to schedule an appointment. See for yourself why *Cincinnati Magazine* has recognized the Firm as a Five Star Wealth Manager. For the latest news about estate planning or upcoming law firm events, subscribe to our blog and "like" us on Facebook. Check our website for upcoming educational events. We continue to expand our capabilities and services to meet the demands of a complex and changing estate planning world. Our experience has shown us what was a solution yesterday may no longer be adequate to fully protect our clients today.

This report reflects the opinion of the Zimmer Law Firm. It is based on our understanding of state and federal laws and is intended only as a simple overview of the planning issues. We recommend you do not base your own planning on the contents of this report alone. Review your estate planning goals with a qualified estate planning attorney.

ABOUT THE ACADEMY

AMERICAN ACADEMY | OF ESTATE PLANNING ATTORNEYS

The Academy is a national organization dedicated to promoting excellence in estate planning by providing its exclusive membership of attorneys with up-to-date research on estate and tax planning, educational materials, and other important resources to empower them to provide superior estate planning services. The Academy expects members to have at least 36 hours of legal education each year specifically in estate, tax, probate and/or elder law subjects.. The Academy has also been recognized as a consumer legal source by *Money Magazine and Consumer Reports Money Adviser,* and its Education Department has been quoted by other consumer press.

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