

A Comparison of Inheritance Rights and the Ability to Disinherit Heirs -- in France and the U.S.

	FRANCE	USA
Surviving Spouse	Protected by the "contract de mariage" (marriage contract)	Retirement accounts
	Donation entre époux (inter-spousal gift) or bequest in a Will	Bequest in a Will
	Reserve héréditaire (elective share) limits the gift	Unlimited + controlled through marital trust
	Can be disinherited	Right to Elect against the estate unless waived in the prenuptial agreement
	Créance alimentaire (maintenance claim)	Family allowance
Children	Reserve héréditaire (elective share)	No protection against being disinherited
	Trust for disabled and rule of Fiduciary	Controlled by creating a trust