

If the taxable estate is:**The tax shall be:**

Over \$1,500,000 but not over \$2,000,000---	\$528,200, plus 45 % of excess over \$1,500,000.
Over \$2,000,000 but not over \$2,500,000---	\$753,200, plus 49 % of excess over \$2,000,000.
Over \$2,500,000 but not over \$3,000,000---	\$998,200, plus 53 % of excess over \$2,500,000.
Over \$3,000,000 but not over \$3,500,000---	\$1,263,200, plus 56 % of excess over \$3,000,000.
Over \$3,500,000 but not over \$4,000,000---	\$1,543,200, plus 59 % of excess over \$3,500,000.
Over \$4,000,000 but not over \$5,000,000---	\$1,838,200, plus 63 % of excess over \$4,000,000.
Over \$5,000,000 but not over \$6,000,000---	\$2,468,200, plus 67 % of excess over \$5,000,000.
Over \$6,000,000 but not over \$7,000,000---	\$3,138,200, plus 70 % of excess over \$6,000,000.
Over \$7,000,000 but not over \$8,000,000---	\$3,838,200, plus 73 % of excess over \$7,000,000.
Over \$8,000,000 but not over \$10,000,000--	\$4,568,200, plus 76 % of excess over \$8,000,000.
Over \$10,000,000-----	\$6,088,200, plus 77 % of excess over \$10,000,000.

SEC. 2002. LIABILITY FOR PAYMENT.

The tax imposed by this chapter shall be paid by the executor.

PART II—CREDITS AGAINST TAX

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SEC. 2014. CREDIT FOR FOREIGN DEATH TAXES.

(a) **IN GENERAL.**—The tax imposed by section 2001 shall be credited with the amount of any estate, inheritance, legacy, or succession taxes actually paid to any foreign country in respect of any property situated within such foreign country and included in the gross estate (not including any such taxes paid with respect to the estate of a person other than the decedent). **[If the decedent at the time of his death was not a citizen of the United States, credit shall not be allowed under this section unless the foreign country of which such decedent was a citizen or subject, in imposing such taxes, allows a similar credit in the case of a citizen of the United States resident in such country.]** The determination of the country within which property is situated shall be made in accordance with the rules applicable under subchapter B (sec. 2101 and following) in determining whether property is situated within or without the United States.

(b) **LIMITATIONS ON CREDIT.**—The credit provided in this section with respect to such taxes paid to any foreign country—

(1) shall not, with respect to any such tax, exceed an amount which bears the same ratio to the amount of such tax actually paid to such foreign country as the value of property which is—