

1 classes of stock entitled to vote of a foreign corporation;
 2 and

3 “(2) if such decedent owned (within the mean-
 4 ing of section 958(a)), or is considered to have owned
 5 (by applying the ownership rules of section 958(b)),
 6 at the time of his death, more than 50 percent of the
 7 total combined voting power of all classes of stock en-
 8 titled to vote of such foreign corporation;

9 then that proportion of the fair market value of the stock of
 10 such foreign corporation owned (within the meaning of sec-
 11 tion 958(a)) by such decedent at the time of his death;
 12 which the fair market value of any assets owned by such for-
 13 eign corporation and situated in the United States, at the time
 14 of his death, bears to the total fair market value of all assets
 15 owned by such foreign corporation at the time of his death;
 16 shall be included in the gross estate of such decedent. For
 17 purposes of the preceding sentence; a decedent shall be
 18 treated as owning stock of a foreign corporation at the time
 19 of his death if, at the time of a transfer, by trust or otherwise,
 20 within the meaning of sections 2035 to 2038, inclusive, he
 21 owned such stock.

22 “(c) CREDITS.—The tax imposed by subsection (a)
 23 shall be credited with the amounts determined in accordance
 24 with section 2102.