

1 *terminated as provided in section 2106, of every decedent non-*
 2 *resident not a citizen of the United States:*

"If the taxable estate is:

The tax shall be:

<i>Not over \$100,000-----</i>	<i>5% of the taxable estate.</i>
<i>Over \$100,000 but not over</i> <i>\$500,000-----</i>	<i>\$5,000, plus 10% of excess over</i> <i>\$100,000.</i>
<i>Over \$500,000 but not over</i> <i>\$1,000,000-----</i>	<i>\$45,000, plus 15% of excess over</i> <i>\$500,000.</i>
<i>Over \$1,000,000 but not over</i> <i>\$2,000,000-----</i>	<i>\$120,000, plus 20% of excess over</i> <i>\$1,000,000.</i>
<i>Over \$2,000,000-----</i>	<i>\$320,000, plus 25% of excess over</i> <i>\$2,000,000."</i>

3 *(b) CREDITS AGAINST TAX.—Section 2102 (relating*
 4 *to credits allowed against estate tax) is amended to read as*
 5 *follows:*

6 ***"SEC. 2102. CREDITS AGAINST TAX.***

7 *"(a) IN GENERAL.—The tax imposed by section 2101*
 8 *shall be credited with the amounts determined in accordance*
 9 *with sections 2011 to 2013, inclusive (relating to State death*
 10 *taxes, gift tax, and tax on prior transfers), subject to the*
 11 *special limitation provided in subsection (b).*

12 *"(b) SPECIAL LIMITATION.—The maximum credit*
 13 *allowed under section 2011 against the tax imposed by sec-*
 14 *tion 2101 for State death taxes paid shall be an amount*
 15 *which bears the same ratio to the credit computed as pro-*
 16 *vided in section 2011(b) as the value of the property, as*
 17 *determined for purposes of this chapter, upon which State*