

1 (g) *ESTATE TAX RETURNS*.—Paragraph (2) of sec-
 2 tion 6018(a) (relating to estates of nonresidents not citi-
 3 zens) is amended by striking out “\$2,000” and inserting in
 4 lieu thereof “\$30,000”.

5 (h) *CLERICAL AMENDMENT*.—The table of sections for
 6 subchapter B of chapter 11 (relating to estates of nonresi-
 7 dents not citizens) is amended by adding at the end thereof
 8 the following:

 “Sec. 2107. *Expatriation to avoid tax.*

 “Sec. 2108. *Application of pre-1967 estate tax provisions.*”

9 (i) *EFFECTIVE DATE*.—The amendments made by this
 10 section shall apply with respect to estates of decedents dying
 11 after the date of the enactment of this Act.

12 **SEC. 109. TAX ON GIFTS OF NONRESIDENTS NOT CITI-**
 13 **ZENS.**

14 (a) *IMPOSITION OF TAX*.—Subsection (a) of section
 15 2501 (relating to general rule for imposition of tax) is
 16 amended to read as follows:

17 “(a) *TAXABLE TRANSFERS*.—

18 “(1) *GENERAL RULE*.—For the calendar year
 19 1955 and each calendar year thereafter a tax, computed
 20 as provided in section 2502, is hereby imposed on the
 21 transfer of property by gift during such calendar year by
 22 any individual, resident or nonresident.

23 “(2) *TRANSFERS OF INTANGIBLE PROPERTY*.—

24 Except as provided in paragraph (3), paragraph (1)