

tion 2511 (relating to situs rule for stock in a corporation)
is amended to read as follows:

“(b) *INTANGIBLE PROPERTY*.—For purposes of this chapter, in the case of a nonresident not a citizen of the United States who is excepted from the application of section 2501(a)(2)—

“(1) shares of stock issued by a domestic corporation, and

“(2) debt obligations of—

“(A) a United States person, or

“(B) the United States, a State or any political subdivision thereof, or the District of Columbia, which are owned by such nonresident shall be deemed to be property situated within the United States.”

(c) *EFFECTIVE DATE*.—The amendments made by this section shall apply with respect to the calendar year 1967 and all calendar years thereafter.

SEC. 110. *TREATY OBLIGATIONS.*

No amendment made by this title shall apply in any case where its application would be contrary to any treaty obligation of the United States. For purposes of the preceding sentence, the extension of a benefit provided by any amendment made by this title shall not be deemed to be contrary to a treaty obligation of the United States.