

Federal Estate Tax Returns Filed for Nonresident Aliens, 1999 and 2000

by Darien Berkowitz Jacobson

The Federal tax system includes taxes on the right to transfer tangible and intangible property. The estate tax, part of the transfer taxes, is incurred when transferring property at death. This tax applies to the estates of U.S. citizens, resident aliens, and nonresident aliens who die owning property in the United States. The estate tax, whether incurred by estates of U.S. citizens, resident aliens, or nonresident aliens, is not a tax on an inheritance or on property. Instead, it is a tax on the right to transfer property at death.

For Filing Year 1999, the estate tax for U.S. citizens and resident aliens was incurred by estates in which decedents owned \$650,000 or more in gross assets. However, the filing threshold of \$650,000 increased to \$675,000 in 2000 as a result of the Economic Recovery Tax Act (ERTA) of 1997. The estates of nonresident alien decedents have a filing threshold of \$60,000 in U.S. gross assets. This threshold, established in 1988, did not increase with the ERTA of 1997. Tangible or real property that is owned by a nonresident alien and is physically located in the United States makes the asset part of the nonresident alien's U.S. gross estate. Intangible property, such as stocks or debt obligations, is included in a nonresident alien's estate based on the characteristics of the issuer or obligor. If the issuer of stock is a domestic corporation, or if the obligor of debt is a U.S. citizen or resident, domestic corporation, partnership, or Governmental unit, then the property is considered part of the nonresident alien's U.S. gross assets.

Although filing thresholds for estates of nonresident aliens differ from those of U.S. citizens and resident aliens, the same graduated and progressive tax rate structure is applied. The rate begins with 18 percent for the first \$10,000 of adjusted taxable estate and continues to rise until it tops out at 55 percent for adjusted taxable estates of more than \$3,000,000. The data collected by the Statistics of Income Division (SOI) of the Internal Revenue Service provide a snapshot of information about nonresident alien decedents, as well as the type and value of property that they hold in the United States.

For Filing Years 1999 and 2000, there were 990 Federal estate tax Forms 706NA filed for nonresident alien decedents. The returns received in 1999 and 2000 were not uniform in scope; therefore, different categories were created for analysis. The filing population of returns was broken into the following three categories: regular returns, treaty status returns, and incomplete or out-of-scope returns. Regular returns are filed by the estates of nonresident alien decedents who held assets in the United States worth \$60,000 or more at the time of death. Treaty status returns were filed for nonresident aliens who held assets in the United States worth \$60,000 or more at the time of death, but were domiciled in countries in which the United States has an applicable estate tax treaty. This means that these estates have different tax options that are not offered to regular return filers, such as a higher unified credit, or special deductions. Treaty status returns are often filed without dollar amounts or less information than regular returns, in part, due to varying reporting practices among countries. The incomplete returns are filed with missing pages or dollar amounts that prevent SOI review. Returns are considered out-of-scope if the estate held less than \$60,000 in U.S. assets. For Filing Year 1999, SOI received 126 regular returns, 350 treaty status returns, and 76 incomplete or out-of-scope returns. SOI saw 113 regular returns, 290 treaty status returns, and 35 incomplete or out-of-scope returns for Filing Year 2000 (see Figure A). In this article, the incomplete and out-of-scope returns are excluded. The population is then comprised

Figure A

Form 706NA Returns Filed in 1999 and 2000, by Type of Return

Type of return	1999		2000	
	Number of returns	Percentage of total	Number of returns	Percentage of total
	(1)	(2)	(3)	(4)
Total	552	100.0	438	100.0
Regular.....	126	22.8	113	25.8
Treaty status.....	350	63.4	290	66.2
Incomplete/out-of-scope.....	76	13.8	35	8.0

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of regular and treaty returns. However, due to filing differences between these two types of returns, data tables will refer only to the regular returns, unless otherwise stated.

Regular Returns

The number of nonresident alien decedents whose estates filed a regular Form 706NA was 126 in 1999 and 113 in 2000 (see Figure B). However, the total gross estate in the United States of those that filed rose approximately from \$60.7 million in 1999 to \$132.4 million in 2000.

For both years, the highest percentage of nonresident alien estates was in the size of U.S. gross estate category \$100,000 under \$250,000. In 1999, about 37.3 percent of estates were in this range, while, in 2000, this percentage dropped to 35.4 percent. In 1999, about 15.9 percent of filers were in the largest gross estate category, \$1 million or more, and this percentage dropped only slightly in 2000 to 15.0 percent.

For 1999, some 116 nonresident alien estates incurred an estate tax liability, and only 88 estates incurred tax liabilities for 2000. The estate tax for 1999 was nearly \$14.7 million, while it increased greatly in 2000 to almost \$30.8 million.

Citizenship Data

In Filing Year 1999, the average size of U.S. total gross estate was \$552,541, where U.S. total gross estate is defined as the value of assets held in the

United States and held by the decedent at the date of death (see Figure C). Afghanistan residents had the highest average size of U.S. total gross estate, almost \$3.0 million, and a net estate tax of \$765,829. Morocco had the second highest average gross estate, \$2.1 million, and a higher net estate tax burden than Afghanistan, \$818,646. The country with the third largest average U.S. gross estate was Portugal, which reported about \$1.8 million in average gross estate. Israel had the fourth largest average size of U.S. total estate, \$1.1 million, and a net estate tax liability of \$1.4 million.

For Filing Year 2000, the average size of U.S. total gross estate increased to almost \$1.5 million, and net estate tax liability rose to about \$30.8 million. In Filing Year 2000, there were no estates that filed a Form 706NA from Afghanistan, the leader from 1999. Morocco had the largest average U.S. gross estate for 2000, almost \$22.3 million, representing a large increase from the previous year. Morocco also had an increase in net estate tax liability, rising to \$11.1 million from Filing Year 1999. In 2000, Israel had the second largest average U.S. gross estate, \$18.2 million, and its net estate tax increased to \$5.1 million. Hong Kong had the third largest average U.S. gross estate with about \$2.7 million in gross assets, and a net estate tax liability of almost \$3.7 million. Russia had the fourth largest average U.S. gross estate, just under \$2 million, and a net estate tax of \$746,200.

Figure B

Form 706NA Returns Filed in 1999 and 2000: Number of Returns and U.S. Total Gross Estate, by Size of U.S. Total Gross Estate

Size of U.S. total gross estate	U.S. total gross estate, tax purposes					
	1999			2000		
	Number of returns	Percentage of total	Amount	Number of returns	Percentage of total	Amount
Total	126	86.5	60,687,546	113	100.0	132,394,135
Less than \$60,000 ¹	**	**	**	--	--	--
\$60,000 under \$100,000.....	**17	**13.5	**1,364,556	24	21.2	1,862,003
\$100,000 under \$250,000.....	47	37.3	7,820,708	40	35.4	6,056,061
\$250,000 under \$500,000.....	24	19.0	8,747,254	19	16.8	6,639,538
\$500,000 under \$1 million.....	18	14.3	12,761,792	13	11.5	8,577,795
\$1 million or more.....	20	15.9	29,993,236	17	15.0	109,258,738

** Data deleted or combined to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

¹ Due to alternate valuation, some estates fall below the filing threshold.

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Figure C

Form 706NA Returns: Average Size of U.S. Total Gross Estate and Net Estate Tax, by Domicile at Death, Filing Years 1999 and 2000

Domicile at death	1999		2000	
	U.S. total gross estate, average ¹	Net estate tax	U.S. total gross estate, average ¹	Net estate tax
	(1)	(2)	(3)	(4)
All countries.....	552,541	14,680,834	1,470,131	30,781,044
Afghanistan.....	2,952,405	765,829	--	--
Antibes.....	--	--	1,539,781	510,519
Argentina.....	179,181	139,209	474,202	277,102
Bahamas.....	294,426	130,680	349,875	91,758
Belgium.....	220,567	146,859	519,299	565,665
Bermuda.....	--	--	283,465	45,655
Bolivia.....	302,391	75,612	--	--
Brazil.....	754,464	1,125,505	114,230	11,530
Chile.....	--	--	183,621	28,770
China.....	133,420	--	--	--
Colombia.....	206,059	861,969	133,776	63,715
Costa Rica.....	58,452	--	--	--
Crans-Pres-Celgny.....	180,000	35,400	--	--
Cyprus.....	200,991	71,828	--	--
Czech Republic.....	--	--	136,111	21,633
Dubai.....	61,094	284	1,248,649	--
Ecuador.....	--	--	118,125	25,400
El Salvador.....	227,053	146,708	--	--
Ethiopia.....	--	--	141,671	23,301
Guatemala.....	302,500	71,970	--	--
Honduras.....	113,000	14,596	--	--
Hong Kong.....	676,252	896,343	2,692,105	3,764,342
India.....	651,880	198,996	202,154	171,360
Iran.....	215,000	45,040	--	--
Israel.....	1,139,686	1,361,064	18,216,554	5,107,149
Jamaica.....	--	--	74,750	--
Korea.....	77,500	4,550	--	--
Lebanon.....	160,654	29,209	725,611	--
Mexico.....	272,510	819,457	413,908	523,620
Morocco.....	2,103,768	818,646	22,279,520	11,127,286
New Zealand.....	717,081	890,857	564,144	105,186
Nicaragua.....	--	--	171,350	31,890
Nigeria.....	490,000	--	--	--
Orient.....	--	--	200,753	37,223
Pakistan.....	--	--	289,432	71,207
Panama.....	--	--	119,205	29,259
Peru.....	--	--	76,029	4,168
Philippines.....	174,550	95,179	90,130	4,829
Portugal.....	1,780,000	543,067	--	--
Puerto Rico.....	727,586	1,923,275	87,166	5,027,829
Rua Alvorado.....	--	--	480,560	136,190
Russia.....	909,872	823,458	1,952,000	746,200
San Pedro.....	--	--	61,250	325
San Salvador.....	--	--	787,970	453,390
Saudi Arabia.....	939,763	133,203	737,024	494,750
Singapore.....	--	--	233,056	103,956
Spain.....	599,950	1,166,827	345,158	327,146
Sri Lanka.....	408,691	80,214	--	--
Taiwan.....	604,488	478,001	410,367	43,771
Tokelau.....	--	--	151,425	23,456
Trinidad.....	--	--	92,265	17,657
Venezuela.....	245,976	687,978	256,415	763,807
Virgin Islands.....	98,894	8,641	382,023	--
West Indies.....	711,388	90,380	--	--

¹ Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of date of death or within 6 months thereafter (i.e., alternate valuation method).

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Figure D

Form 706NA Returns Filed in 1999 and 2000: Selected Items, by Sex of Decedent

Sex of decedent	U.S. total gross estate, tax purposes ¹						Net estate tax			
	1999			2000			1999		2000	
	Number of returns	Percentage of total	Amount	Number of returns	Percentage of total	Amount	Amount	Percentage of total	Amount	Percentage of total
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total.....	126	100.0	60,687,546	113	100.0	132,394,135	14,680,834	100.0	30,781,044	100.0
Female.....	30	23.8	8,609,791	24	21.2	13,373,923	1,848,811	12.6	3,371,196	11.0
Male.....	96	76.2	52,077,755	89	78.8	119,020,212	12,832,023	87.4	27,409,848	89.0

¹ Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of date of death or within 6 months thereafter (i.e., alternate valuation method).

Demographic Data

For 1999 and 2000, the IRS received 126 and 113 regular returns, respectively. In both filing years, there were more male nonresident alien decedents than female nonresident alien decedents (see Figure D). For Filing Year 1999, the number of male decedents totaled 96 (76.2 percent of the total population of regular returns), while female decedents totaled only 30 (23.8 percent). Male decedents for Filing Year 2000 totaled 89 (78.8 percent of the total population of regular returns), and female decedents totaled only 24 (21.2 percent).

The burden of estate tax fell heavier on the estates of male decedents. This is due to the higher number of male decedents in the filing population for both 1999 and 2000. The estates of male decedents had 87.4 percent of the estate tax liability for Filing Year 1999, while the estates of female decedents held only 12.6 percent of the estate tax liability for 1999. The estates of male decedents reported \$12.8 million in estate tax liability for 1999, and the estates of female decedents reported almost \$1.9 million. This trend continued for Filing Year 2000. The estates of male decedents were responsible for 89 percent of the combined estate tax liability compared to the estates of female decedents, which were responsible for 11 percent. This represents \$27.4 million in reported estate tax liability for male decedents and almost \$3.4 million in reported liability for female decedents.

For Filing Year 1999, the average age at death for this nonresident alien estate tax population was 68 years (see Figure E). Average age at death in-

creased by one year, to 69, for Filing Year 2000. The average life expectancy for the world in 2000 was 66 years, according to the *World Health Report* from 2001 [1]. Therefore, the population of nonresident aliens exceeded the world average life expectancy. However, the population of nonresident aliens did not exceed the life expectancy of U.S. residents. The average life expectancy for a U.S. resident in 2000 was 76.7, according to the National Center for Health Statistics [2].

Asset Data

For the nonresident alien, the estate tax is applied to assets located in the United States at the time of death. For estate tax purposes, the values of the nonresident alien decedent's U.S. assets are based on the fair market value at one of two dates. The decedent's executor or administrator can value the assets at the date of the decedent's death or at an

Figure E

Form 706NA Returns Filed in 1999 and 2000, by Sex of Decedent and Average Age

Sex of decedent	1999		2000	
	Number of returns	Average age	Number of returns	Average age
	(1)	(2)	(3)	(4)
All.....	126	68	113	69
Female.....	30	68	24	72
Male.....	96	68	89	68

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alternate valuation date within 6 months after the date of the decedent's death [3].

For Filing Year 1999, the estates of nonresident alien decedents held \$25.9 million in real estate, which represented 44 percent of the combined U.S. total gross assets (see Figure F). Real estate holdings included personal residences, as well as the value of real estate partnerships or noncorporate businesses based on the ownership of real estate. This was the largest U.S. investment for this filing population. The second most prevalent asset type for this filing year of nonresident alien decedent population was stock. Stock accounted for \$22.1 million of the combined U.S. gross assets, 36 percent of total assets for Filing Year 1999. The bonds and cash categories were the third largest of all the asset categories. These categories accounted for 5 percent of U.S. assets held by the estates of nonresident alien decedents in Filing Year 1999. Assets held in the form of bonds and cash totaled \$3.1 million and almost \$3.0 million, respectively.

For Filing Year 2000, stock not real estate was the largest category of assets held in the United States by the estates of nonresident alien decedents. Stock accounted for \$57.8 million or 44 percent of the total U.S. assets held by the estates of nonresident alien decedents. Assets in the form of real estate were the second largest category of assets for Filing Year 2000. Assets in this form totaled \$50.6 million or 38 percent of the total U.S. assets held by the estates of nonresident alien decedents. For Filing Year 2000, the "other" category had the third largest holdings. This category included the net value of insurance, depletable and intangibles, annuities, art, and assets that do not fit into any of the categories. The "other" category totaled \$11.2 million, which equaled 9 percent of total assets for the estates of nonresident aliens.

Treaty Status Returns

The United States holds estate tax treaties with 18 countries: Australia, Austria, Canada, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Japan, Netherlands, Norway, Scotland, South Africa, Sweden, Switzerland, and the United Kingdom. The treaties may differ among countries, but the basic provisions provide mutual administration assistance between the U.S. and each country and avoid double taxation. This does not mean that the estates are not

required to pay estate tax, but that they are given more tools to reduce the tax burden and, in some situations, reduce the tax burden to zero. Since these returns are different than the returns filed by estates from other non-treaty status countries, they are separated out for this study. They also exhibit different reporting practices, since executors follow the rules of the treaty and are not always required to list the dollar amount of assets. Figures G through J refer to returns with treaty status that reported dollar amounts.

Citizenship Data

Filing Year 1999 had 59 more treaty status returns than Filing Year 2000. This increase in returns filed was consistent across countries. Canada had the most decedents who owned assets in the United States at the date of death, 127 for 1999 and 124 for 2000 (see Figure G). The second highest number of estate filers came from Germany, with 70 returns for 1999 and 61 returns for 2000. The country with the third highest number of returns was the United Kingdom, with 59 returns for 1999 and 34 returns for 2000.

Canada, Germany, and the United Kingdom had the most filers for Filing Years 1999 and 2000. However, out of these three countries, Canada, with the largest number of returns filed, had the smallest average size of U.S. gross estate, only \$220,721 for 1999 and \$38,414 for 2000 (see Figure H). The United Kingdom ranked third for both 1999 and 2000 in the number of returns filed, but had the largest average size of U.S. gross estate, almost \$4.6 million for 1999 and \$695,760 for 2000.

The estates of United Kingdom decedents had the largest average size of U.S. gross estate. However, these estates had the smallest net estate tax liability for both 1999 and 2000. The net estate tax payable by United Kingdom estates for 1999 was \$547,633 compared to the net estate tax payable for Canada, \$5.0 million, and Germany, \$3.4 million. For Filing Year 2000, the United Kingdom had a net estate tax liability of \$293,309, while Canada and Germany had net estate tax liabilities of \$1.7 million and \$635,069, respectively.

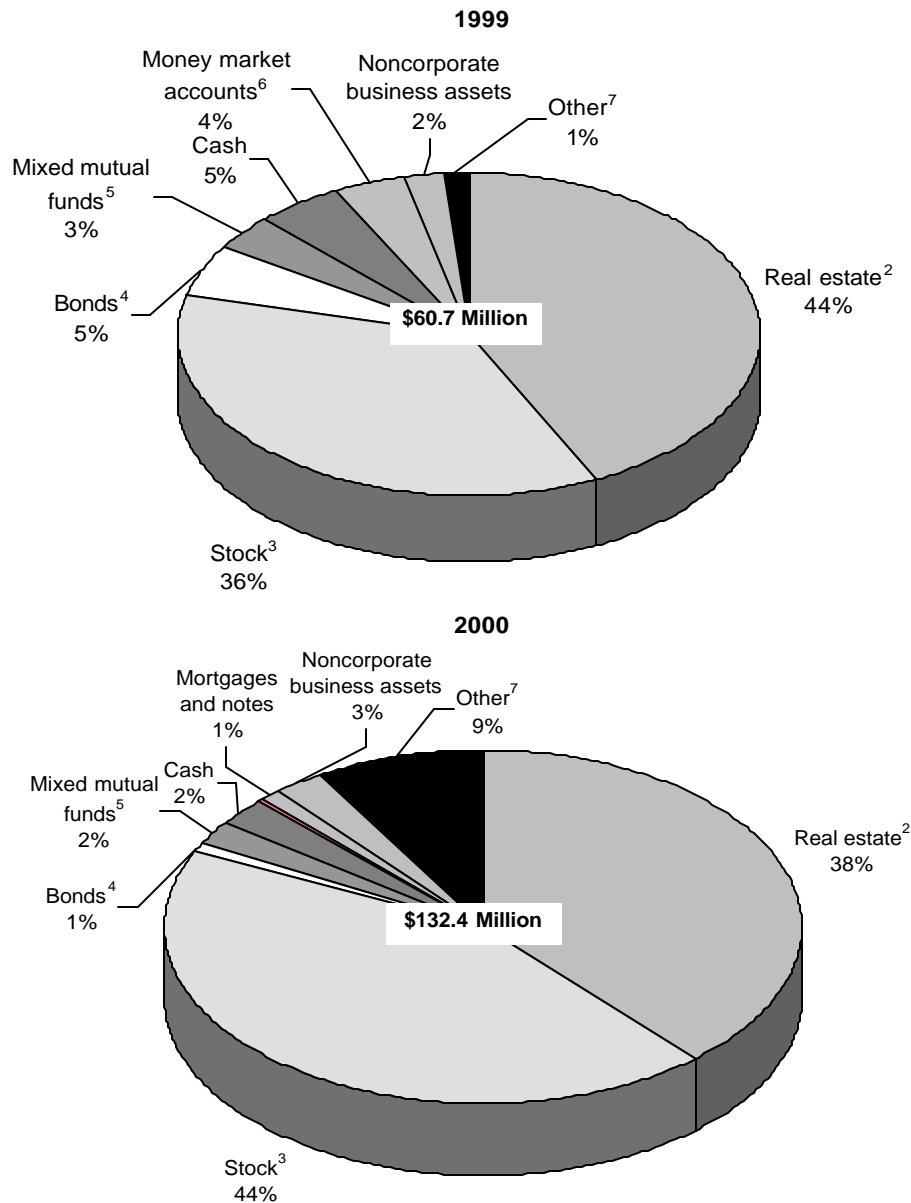
Unified Credit

Part 2, line 7 of Form 706NA is the line on which the estate of the decedent reports the unified credit. The unified credit is applied against the tax imposed on the estate. In general, the maximum unified credit is \$13,000; however, the maximum unified credit may

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Figure F

Form 706NA Returns: Composition of U.S. Total Gross Estate, Filing Years 1999 and 2000¹



¹ Gross estate is shown at the value used to determine estate tax liability. The value can be calculated at the date of death or within 6 months thereafter (i.e., alternate valuation method).

² Real estate category includes the value of all real estate, the value of personal residences, and the value of real estate partnerships.

³ Stock category contains the value of corporate stock and stock in a closely held corporation. The value of mutual funds that are comprised mainly of stock is also included.

⁴ Bonds category contains the value of Federal, State, and local government bonds, as well as foreign and corporate bonds. The value of mutual funds that are comprised of Federal, State, local, foreign and corporate bonds are also included.

⁵ Mixed mutual funds category contains the value of funds that contain assets that are not identified. Therefore, this category may contain the value of stock, bonds, and other assets in mutual funds.

⁶ Money market accounts category contains cash management accounts, ready asset accounts, and other banking or checking type accounts held as mutual funds.

⁷ Other category contains net value of insurance, depletable and intangibles, art, and assets not classified elsewhere.

NOTE: Detail may not add to totals due to rounding.

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Figure G

Form 706NA Treaty Status Returns, Filing Years 1999 and 2000, by Domicile at Death

Domicile at death	Number of returns	
	1999	2000
All countries.....	350	290
Australia.....	5	--
Austria.....	6	4
Canada.....	127	124
Denmark.....	**	**
Finland.....	3	**
France.....	8	8
Germany.....	70	61
Greece.....	**	**
Ireland.....	--	3
Italy.....	13	3
Japan.....	35	31
Netherlands.....	**	6
Norway.....	--	**
Scotland.....	--	**
South Africa.....	**	--
Sweden.....	3	**
Switzerland.....	14	9
United Kingdom.....	59	34

**Data deleted to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

be more than \$13,000 if, on the decedent's date of death, he or she was domiciled in a country that holds a treaty with the United States. The tax code allows for these estates to use a unified credit equal to the amount equivalent to the same ratio of credit allowed to the estate of a U.S. citizen. The numerator of the ratio is the value of the decedent's gross estate located within the United States, and the denominator is the decedent's entire gross estate wherever situated. This ratio allows the estates of these nonresident alien decedents to lower their total gross estates and thus lower the estate tax.

The estates of nonresident alien decedents domiciled in Australia at the date of death had the highest average unified credit for Filing Year 1999, about \$82,099 (see Figure I). Returns filed with estates domiciled in Switzerland had the second highest average unified credit, \$50,872 for Filing Year 1999. The third highest average unified credit was from estates domiciled in Italy, with \$42,079.

For Filing Year 2000, the top two countries with the highest average unified credit were different than those from the previous year. Estates from Japan had the highest average unified credit, with \$34,699, and the second highest average unified credit of \$27,658 was from estates domiciled in Canada. Switzerland,

Figure H

Average Size of U.S. Total Gross Estate and Net Estate Tax for Form 706NA Treaty Status Returns Filed in 1999 and 2000, by Domicile at Death

Domicile at death	1999		2000	
	U.S. total gross estate, average ¹	Net estate tax	U.S. total gross estate, average ¹	Net estate tax
	(1)	(2)	(3)	(4)
All countries.....	962,835	22,916,723	214,366	7,464,058
Australia.....	438,417	261,328	--	--
Austria.....	101,615	15,671	526,944	11,163
Canada.....	220,721	5,060,150	38,414	1,658,773
Finland.....	176,603	9,012	**	**
France.....	215,143	151,422	361,220	320,147
Germany.....	356,897	3,417,584	176,481	635,069
Greece.....	**	**	**	**
Ireland.....	**	**	168,922	91,500
Italy.....	554,849	1,062,960	201,898	54,125
Japan.....	856,395	10,351,462	389,488	1,860,580
Netherlands.....	**	**	469,858	494,772
Scotland.....	--	--	**	**
South Africa.....	**	**	--	--
Sweden.....	50,262	12,992	**	**
Switzerland.....	960,882	2,026,509	767,825	2,044,620
United Kingdom.....	4,560,245	547,633	695,760	293,309

** Data deleted to prevent individual taxpayer data. However, the data are included in the appropriate tables.

¹ Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of date of death or within 6 months thereafter (i.e., alternate valuation method).

Figure I

Average Unified Credit for Form 706NA Treaty Status Returns Filed in 1999 and 2000, by Domicile at Death

Domicile at death	Average U.S. unified credit ¹	
	1999	2000
Australia.....	82,099	--
Austria.....	13,000	13,000
Canada.....	38,844	27,658
Finland.....	38,339	--
France.....	11,336	13,000
Germany.....	15,084	11,779
Greece.....	13,000	--
Ireland.....	--	13,000
Italy.....	42,079	24,250
Japan.....	32,536	34,699
Netherlands.....	13,000	13,000
Scotland.....	--	13,000
South Africa.....	8,113	--
Sweden.....	13,000	--
Switzerland.....	50,872	26,492
United Kingdom.....	21,994	14,929

¹ Unified credit is not present on all treaty returns.

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which had the third highest average unified credit in 2000, about \$26,492, dropped from having the second highest average unified credit in 1999.

Asset Data

The population of nonresident alien decedents domiciled in a country that maintains an estate tax treaty with the United States reported owning a total of \$123.7 million in U.S. assets at the date of death, or within 6 months thereafter, for Filing Year 1999. Out of the total assets from treaty status returns, \$43.5 million or 49 percent were in the form of real estate (see Figure J). This is the same percentage as for returns filed by the estates of nonresident alien decedents who were not domiciled in a treaty status country at the date of death.

Stock was the second largest type of asset held in the United States, almost \$26.3 million, or 30 percent of the total. However, the similarities between the regular return filers and the treaty status filers end with the third largest category of assets, which was the noncorporate business assets category. For Filing Year 1999, noncorporate business assets totaled \$6.8 million, which was 8 percent of total assets held in United States treaty status estates.

For Filing Year 2000, the total U.S. assets reported by estates of nonresident alien decedents domiciled in a country in which an estate tax treaty is held with the United States were lower than the previous year, down to \$74.3 million from \$123.7 million. There were some similarities between nonresident alien estates filing in 1999 and 2000; however, the top three categories with the largest amount of assets were not the same for the treaty status returns and the regular returns for Filing Year 2000. The largest type of asset reported on treaty status returns in Filing Year 2000 was real estate, which amounted to \$39.5 million and comprised 55 percent of total assets. The second largest type of asset held in 2000 for treaty status returns was stock. The total value of the stock held was \$17.8 million, and this was 24 percent of total assets held in the United States by treaty status nonresident aliens at death. The third largest category of assets was in the forms of “other” and noncorporate business assets. This is a slight change from the previous year in which the “other” category was the sole asset in this position. Both of these assets accounted for 7 percent of total assets. Noncorporate business assets totaled \$4.9

million, whereas “other” assets totaled \$5.2 million.

Data Sources and Limitations

Since 1995, SOI has conducted an annual study of Federal estate tax returns filed for nonresident aliens (Forms 706NA). The demographic, financial, and asset information for the 1999 and 2000 filing years was extracted from Forms 706NA that are filed in the Philadelphia Submission Processing Center. For each year, nonresident alien estate tax returns were examined for the population of filers. Therefore, the amounts shown in this article are not estimates but rather pre-audit population figures.

The United States maintains estate and gift tax treaties with a number of countries. These treaties are in place to help avoid double taxation and to provide mutual administrative assistance between the United States and its treaty partners. The reporting on these returns varies among the countries. Therefore, the information extracted from these Forms 706NA explicitly identified as treaty returns in Filing Years 1999 and 2000 is separated from the regular returns.

Explanation of Selected Terms

Brief definitions of some of the terms used in the text and tables are provided below:

Adjusted taxable estate.--Adjusted taxable estate is equal to the sum of taxable estate and adjusted taxable gifts.

Adjusted taxable gifts.--Certain gifts of tangible or intangible property located in the United States and made during the life of an individual who died before 1982 were automatically included in gross estate. However, for the estate of an individual who died after 1981, these gifts were not generally included in the gross estate. Instead, they were added to the taxable estate, creating the “adjusted taxable estate” for the purposes of determining the “estate tax before credits.”

Charitable deduction.--This was the deduction allowable for a decedent’s contributions to qualifying charitable organizations.

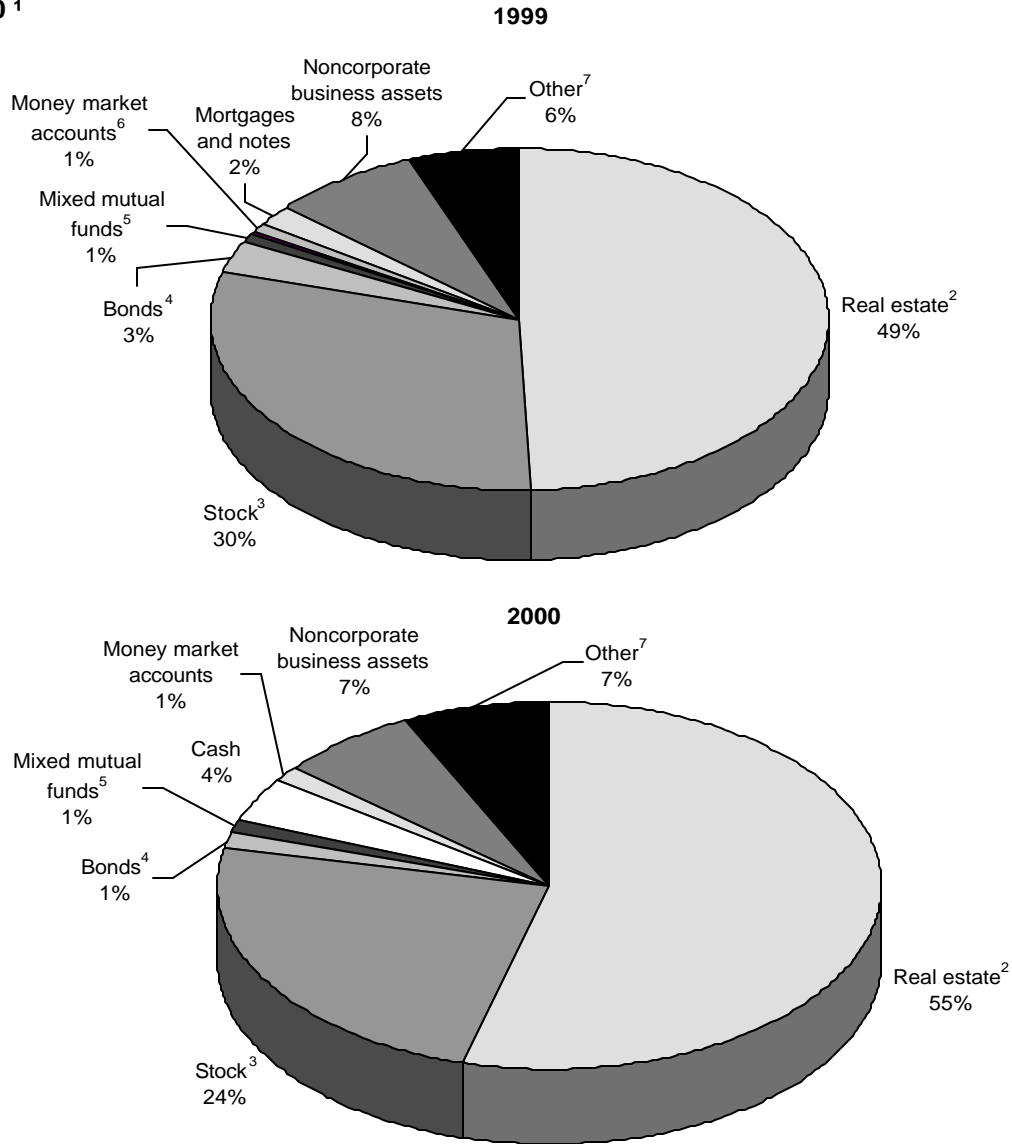
Estate tax before credits.--This was the tax obtained by applying the graduated estate tax rates to the adjusted taxable estate reduced by the amount of Federal gift taxes previously paid.

Federal gift taxes previously paid.--Credit was allowed against the estate tax for the Federal gift tax

Federal Estate Tax Returns Filed for Nonresident Aliens, 1999 and 2000

Figure J

Form 706NA Returns with Treaty Status: Composition of U.S. Total Gross Estate, Filing Years 1999 and 2000 ¹



¹ Gross estate is shown at the value used to determine estate tax liability. The value can be calculated at the date of death or within 6 months thereafter (i.e., alternate valuation method).

² Real estate category includes the value of all real estate, the value of personal residences, and the value of real estate partnerships.

³ Stock category contains the value of corporate stock and stock in a closely held corporation. The value of mutual funds that are comprised mainly of stock is also included.

⁴ Bonds category contains the value of Federal, State, and local government bonds, as well as foreign and corporate bonds. The value of mutual funds that are comprised of Federal, State, local, foreign and corporate bonds is also included.

⁵ Mixed mutual funds category contains the value of funds that contain assets that are not identified. Therefore, this category may contain the value of stock, bonds, and other assets in mutual funds.

⁶ Money market accounts category contains cash management accounts, ready asset accounts, and other banking or checking type accounts held as mutual funds.

⁷ Other category contains net value of insurance, depletable and intangibles, art, and assets not classified elsewhere.

NOTE: Detail may not add to totals due to rounding.

Federal Estate Tax Returns Filed for Nonresident Aliens, 1999 and 2000

paid on gifts made by a decedent before 1977. No credit, apart from the unified credit, was allowed for any gift tax paid on gifts made after 1976.

Marital deduction.--This is equal to the value of property interests passing from the decedent to the surviving spouse and was taken as a deduction from the "total gross estate." Unless an estate tax treaty allows otherwise, the marital deduction was allowed only if the surviving spouse was a U.S. citizen or if the property passed to a qualified domestic trust (QDOT) described in IRC section 2056A.

Net estate tax.--This was the estate's tax liability after credits for State death taxes, foreign death taxes, tax on prior transfers, and Federal gift taxes previously paid were subtracted from gross estate tax. In addition to these credits, a "unified credit," graduated according to the year of death, and a "credit" for gift taxes paid on post-1976 gifts, are allowed (see also "unified credit").

Nonresident alien decedent.--A nonresident alien decedent is neither domiciled in, nor a citizen of, the United States at the time of death. According to IRS definition, a citizen of a U.S. possession is not a U.S. citizen.

Nontaxable returns.--Nontaxable returns were those with no estate tax liability after credits.

Other tax credits.--This was the sum of the tax credits for death taxes paid to foreign governments and Federal gift taxes previously paid. It also included a tax credit for Federal estate tax paid on property received by the decedent or the estate from a transferor who died within 10 years before, or 2 years after, the decedent. This credit was intended to lessen the burden of double taxation between successive estates whose owners had died within a short period of time. Depending on the time that elapsed between the deaths, a credit was allowed for all or part of the Federal estate tax paid by the transferor's estate with respect to the transfer.

Tax on prior transfers.--A tax credit was allowed for Federal estate tax paid on property received by the decedent or the estate from a transferor who died within 10 years before, or 2 years after, the decedent. The credit was intended to

lessen the burden of double taxation between successive estates whose owners had died within a short period of time. Depending on the time that elapsed between the deaths, a credit was allowed for all or part of the Federal estate tax paid by the transferor's estate with respect to the transfer.

Taxable estate.--Taxable estate was the base to which the graduated Federal estate tax rates were applied in computing the estate tax before credits. Taxable estate is equal to the value of the "total gross estate" less deductions for the following: funeral and administrative expenses; casualty and theft losses; debts, mortgages, losses, and other claims against the estate, including pledges to charitable organizations; bequests to the surviving spouse; and the "employee stock ownership plan" (ESOP) deduction (included in the statistics for "other expenses and losses").

Taxable returns.--Taxable returns were those with estate tax liability after credits.

Unified credit.--The unified credit, so called because it is used for both estate and gift tax purposes, is applied as a dollar-for-dollar reduction of the estate tax. (The unified credit represents the amount of tax on that part of gross estate which is below the filing requirement.) The credit must be used to offset gift taxes on lifetime transfers made after 1976. However, to the extent it is so used, the amount of credit available at death is reduced.

Notes and References

- [1] *World Health Report 1998: Global Health Situations and Trends 1955-2065*, 1998. This information is available from the World Wide Web, at <http://www.who.int/whr/2001/archives/1998/factse.htm>
- [2] National Center for Health Statistics. This information is available from the World Wide Web, at <http://www.cdc.gov/nchs/datawh/statab/pubd.htm>
- [3] See Internal Revenue Code section 2032 for a full explanation of alternate value.

IRS Statistics of Income Bulletin, Summer 2002, Publication 1136 (Rev. 08-2002.)

Federal Estate Tax Returns Filed for Nonresident Aliens, 1999 and 2000

Table 1.--Nonresident Alien Estate Tax Returns Filed in 1999: Gross Estate in the U.S., Outside the U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Tax Status and Size of U.S. Gross Estate

[Money amounts are in whole dollars]

Tax status, size of U.S. gross estate	Total gross estate, U.S., tax purposes ¹		Total gross estate, outside the U.S.		Total gross estate, worldwide		Real estate ²	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns, total.....	126	60,687,546	126	61,263,445	126	121,950,991	84	25,891,245
Less than \$100,000.....	17	1,364,556	17	13,265,172	17	14,629,728	12	904,772
\$100,000 under \$500,000.....	71	16,567,962	71	27,215,168	71	43,783,130	52	6,233,316
\$500,000 or more.....	38	42,755,028	38	20,783,105	38	63,538,133	20	14,383,157
Nontaxable returns, total.....	10	2,746,878	10	1,108,636	10	3,855,514	7	1,623,670
Less than \$100,000.....	**	**	**	**	**	**	**	**
\$100,000 under \$500,000.....	**10	**2,746,878	**10	**1,108,636	**10	**3,855,514	**7	**1,623,670
\$500,000 or more.....	**	**	**	**	**	**	**	**
Taxable returns, total.....	116	57,940,668	116	60,154,809	116	118,095,477	77	24,267,575
Less than \$100,000.....	15	1,242,354	15	12,865,172	15	14,107,526	11	841,022
\$100,000 under \$500,000.....	64	14,780,479	64	26,506,532	64	41,287,011	47	9,518,396
\$500,000 or more.....	37	41,917,835	37	20,783,105	37	62,700,940	19	13,908,157

Tax status, size of U.S. gross estate	Stock ³		Bonds ⁴		Mixed mutual funds ⁵		Cash	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All returns, total.....	53	22,062,058	21	3,079,029	7	2,056,733	22	2,951,047
Less than \$100,000.....	**	**	3	52,000	--	--	**	**
\$100,000 under \$500,000.....	**27	**4,452,978	5	161,706	**	**	**8	**446,378
\$500,000 or more.....	26	17,609,080	13	2,865,323	**7	**2,056,733	14	2,446,217
Nontaxable returns, total.....	**	**	--	--	**	**	**	**
Less than \$100,000.....	**	**	--	--	**	**	**	**
\$100,000 under \$500,000.....	**	**	--	--	**	**	**	**
\$500,000 or more.....	**	**	--	--	**	**	**	**
Taxable returns, total.....	53	22,062,058	21	3,079,029	7	2,056,733	22	2,951,047
Less than \$100,000.....	**	**	3	52,000	**	**	--	**
\$100,000 under \$500,000.....	**27	**4,452,978	5	161,706	**	**	**8	**446,378
\$500,000 or more.....	26	17,609,080	13	2,865,323	**7	**2,056,733	14	2,446,217

Tax status, size of U.S. gross estate	Money market accounts ⁶		Insurance, net value		Noncorporate business assets ⁷		Mortgages and notes	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All returns, total.....	13	2,313,658	**	**	5	1,382,567	6	96,544
Less than \$100,000.....	**	**	**	**	**	**	**	**
\$100,000 under \$500,000.....	**6	**944,809	**	**	**	**	**6	**96,544
\$500,000 or more.....	7	1,368,849	**	**	**5	**1,382,567	--	--
Nontaxable returns, total.....	**	**	--	--	**	**	**	**
Less than \$100,000.....	**	**	--	--	**	**	**	**
\$100,000 under \$500,000.....	**	**	--	--	**	**	**	**
\$500,000 or more.....	**	**	--	--	**	**	**	**
Taxable returns, total.....	**13	**2,313,658	**	**	5	1,382,567	6	96,544
Less than \$100,000.....	**	**	**	**	**	**	**	**
\$100,000 under \$500,000.....	**6	**944,809	**	**	**	**	**6	**96,544
\$500,000 or more.....	7	1,015,740	**	**	**5	**1,382,567	--	--

Footnotes at end of table.

Federal Estate Tax Returns Filed for Nonresident Aliens, 1999 and 2000

Table 1.--Nonresident Alien Estate Tax Returns Filed in 1999: Gross Estate in the U.S., Outside the U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Tax Status and Size of U.S. Gross Estate--Continued

(Money amounts are in whole dollars)

Tax status, size of U.S. gross estate	Other assets		Funeral expenses		Executors' commissions		Attorneys' fees	
	Number (25)	Amount (26)	Number (27)	Amount (28)	Number (29)	Amount (30)	Number (31)	Amount (32)
All returns, total.....	28	492,290	35	271,463	10	918,772	40	1,109,096
Less than \$100,000.....	3	47,061	5	31,058	--	--	4	14,210
\$100,000 under \$500,000.....	18	227,561	17	97,786	4	601,772	21	240,144
\$500,000 or more.....	7	217,668	13	142,619	6	317,000	15	854,742
Nontaxable returns, total.....	--	--	3	30,820	**	**	5	26,425
Less than \$100,000.....	--	--	**	**	**	**	**	**
\$100,000 under \$500,000.....	--	--	**3	**30,820	**	**	**5	**26,425
\$500,000 or more.....	--	--	--	--	**	**	--	--
Taxable returns, total.....	28	492,290	32	240,643	**10	**918,772	35	1,082,671
Less than \$100,000.....	3	47,061	4	14,588	--	--	3	13,485
\$100,000 under \$500,000.....	18	227,561	13	83,466	**4	**601,772	17	214,444
\$500,000 or more.....	7	217,668	15	142,619	6	317,000	15	854,742

Tax status, size of U.S. gross estate	Other expenses/losses		Debts and mortgages		Marital and charitable deductions		Total allowable deductions	
	Number (33)	Amount (34)	Number (35)	Amount (36)	Number (37)	Amount (38)	Number (39)	Amount (40)
All returns, total.....	56	2,510,638	33	6,826,005	9	3,211,518	64	9,235,166
Less than \$100,000.....	7	463,337	**	**	**	**	7	25,535
\$100,000 under \$500,000.....	28	1,160,770	**21	**1,909,868	**	**	34	3,148,870
\$500,000 or more.....	21	886,531	12	4,916,280	**9	**3,211,518	23	7,060,761
Nontaxable returns, total.....	4	30,099	6	883,204	3	1,068,181	7	1,787,771
Less than \$100,000.....	**	**	**	**	**	**	**	**
\$100,000 under \$500,000.....	**4	**30,099	**6	**883,204	**	**	**7	**1,787,771
\$500,000 or more.....	--	--	--	--	**3	**1,068,181	**	**
Taxable returns, total.....	52	2,480,539	27	5,942,801	6	2,143,337	57	7,447,395
Less than \$100,000.....	6	454,669	**	**	**	**	6	20,758
\$100,000 under \$500,000.....	25	1,139,339	**15	**1,026,521	**	**	29	1,203,069
\$500,000 or more.....	21	886,531	12	4,916,280	**6	**2,143,337	22	6,223,568

Tax status, size of U.S. gross estate	Taxable estate		Adjusted taxable estate		Estate tax before credits		Allowable unified credit	
	Number (41)	Amount (42)	Number (43)	Amount (44)	Number (45)	Amount (46)	Number (47)	Amount (48)
All returns, total.....	124	51,500,230	124	51,600,309	122	16,830,610	123	1,627,804
Less than \$100,000.....	**17	**1,339,024	17	1,339,024	17	293,219	17	211,354
\$100,000 under \$500,000.....	70	14,466,941	70	14,567,020	68	3,844,724	69	905,980
\$500,000 or more.....	37	35,694,265	37	35,694,265	37	12,692,667	37	510,470
Nontaxable returns, total.....	8	1,006,956	8	1,006,956	6	65,270	7	79,554
Less than \$100,000.....	**	**	**	**	**	**	**	**
\$100,000 under \$500,000.....	**5	**446,398	**8	**1,006,956	**6	**65,270	**7	**79,554
\$500,000 or more.....	3	560,766	--	--	--	--	--	--
Taxable returns, total.....	116	50,493,274	116	50,593,353	116	16,765,340	116	1,548,250
Less than \$100,000.....	15	1,221,599	15	1,221,599	15	267,837	15	185,600
\$100,000 under \$500,000.....	64	13,577,410	64	7,764,489	64	3,804,836	64	849,180
\$500,000 or more.....	37	35,694,265	37	35,694,262	37	12,692,667	37	510,470

Footnotes at end of table.

Federal Estate Tax Returns Filed for Nonresident Aliens, 1999 and 2000

Table 1.--Nonresident Alien Estate Tax Returns Filed in 1999: Gross Estate in the U.S., Outside the U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Tax Status and Size of U.S. Gross Estate--Continued

[Money amounts are in whole dollars]

Tax status, size of U.S. gross estate	State death tax credit		Other credits		Estate tax	
	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)
All returns, total.....	50	518,717	**	**	116	14,680,834
Less than \$100,000.....	**	**	**	**	15	81,363
\$100,000 under \$500,000.....	**34	**69,215	**	**	64	2,866,777
\$500,000 or more.....	16	449,502	**	**	37	11,732,694
Nontaxable returns, total.....	--	--	--	--	--	--
Taxable returns, total.....	50	518,717	**	**	116	14,680,834
Less than \$100,000.....	**	**	**	**	15	81,363
\$100,000 under \$500,000.....	**34	**69,215	**	**	64	2,866,777
\$500,000 or more.....	16	449,502	**	**	37	11,732,694

** Data deleted or combined to prevent disclosure of individual taxpayer data. However, the data are included in the appropriate totals.

¹ Gross estate is shown at the value used to determine estate tax liability. The value can be calculated at the date of death or within 6 months thereafter (alternate valuation method).

² Real estate category includes the value of all real estate, the value of personal residences, and the value of real estate partnerships.

³ Stock category contains the value of corporate stock and stock in a closely held corporation. The value of mutual funds that are comprised mainly of stock is also included.

⁴ Bonds category contains the value of Federal, State, and local government bonds, as well as foreign and corporate bonds. The value of mutual funds that are comprised of Federal, State, local government, foreign, and corporate bonds are also included.

⁵ Mixed mutual funds category contains the value of funds that contain assets that are not identified. Therefore, this category may contain the value of stock, bonds, and other assets in mutual funds.

⁶ Money market accounts category contains cash management accounts, ready asset accounts, and other banking or checking type accounts held as mutual funds.

⁷ The noncorporate business category includes the value of farm assets, limited partnerships, and other noncorporate business assets.

NOTE: Detail may not add to totals due to rounding.

Federal Estate Tax Returns Filed for Nonresident Aliens, 1999 and 2000

Table 2.--Nonresident Alien Estate Tax Returns Filed in 2000: Gross Estate in the U.S., Outside the U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits by Tax Status and Size of U.S. Gross Estate

[Money amounts are in whole dollars]

Tax status, size of U.S. gross estate	Total gross estate, U.S., tax purposes ¹		Total gross estate, outside the U.S.		Total gross estate, worldwide	
	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
All returns, total.....	113	132,394,135	113	73,527,680	113	205,921,814
Less than \$100,000.....	24	1,862,003	24	4,379,557	24	6,241,560
\$100,000 under \$500,000.....	59	12,695,599	59	53,626,712	59	66,322,309
\$500,000 or more.....	30	117,836,533	30	15,521,411	30	133,357,945
Nontaxable returns, total.....	25	9,532,632	25	31,942,357	25	41,474,989
Less than \$100,000.....	9	676,841	9	846,112	9	1,522,953
\$100,000 under \$500,000.....	10	2,646,195	10	29,643,132	10	32,289,327
\$500,000 or more.....	6	6,209,596	6	1,453,113	6	7,662,709
Taxable returns, total.....	88	122,861,503	88	41,585,323	88	164,446,825
Less than \$100,000.....	15	1,185,162	15	3,533,445	15	4,718,607
\$100,000 under \$500,000.....	49	10,049,404	49	23,983,580	49	34,032,982
\$500,000 or more.....	24	111,626,937	24	14,068,298	24	125,695,236
Tax status, size of U.S. gross estate	Real estate ²		Stock ³		Bonds ⁴	
	Number	Amount	Number	Amount	Number	Amount
	(7)	(8)	(9)	(10)	(11)	(12)
All returns, total.....	65	50,664,178	55	57,848,565	16	1,162,256
Less than \$100,000.....	18	1,235,395	7	330,955	**	9,893
\$100,000 under \$500,000.....	26	4,423,081	30	5,451,434	**13	**894,393
\$500,000 or more.....	18	44,637,379	17	51,668,516	3	267,863
Nontaxable returns, total.....	20	4,609,573	8	3,257,879	4	365,492
Less than \$100,000.....	8	564,830	**	**	--	--
\$100,000 under \$500,000.....	8	1,832,155	**3	**522,842	**4	**365,492
\$500,000 or more.....	4	2,212,000	5	2,735,037	**	**
Taxable returns, total.....	45	46,054,605	47	54,590,686	12	796,764
Less than \$100,000.....	11	735,169	6	231,226	**	**
\$100,000 under \$500,000.....	30	2,894,645	28	5,028,321	**12	**796,764
\$500,000 or more.....	14	42,424,791	13	49,331,139	**	**
Tax status, size of U.S. gross estate	Mixed mutual funds ⁵		Cash		Money market accounts ⁶	
	Number	Amount	Number	Amount	Number	Amount
	(13)	(14)	(15)	(16)	(17)	(18)
All returns, total.....	8	2,964,136	25	3,148,123	11	430,914
Less than \$100,000.....	**	**	4	80,176	**	**
\$100,000 under \$500,000.....	**8	**2,964,136	13	397,761	**11	**430,914
\$500,000 or more.....	**	**	8	2,670,186	**	**
Nontaxable returns, total.....	**	**	3	142,611	**	**
Less than \$100,000.....	**	**	**	**	**	**
\$100,000 under \$500,000.....	**	**	**3	**142,611	**	**
\$500,000 or more.....	**	**	**	**	**	**
Taxable returns, total.....	**8	**2,964,136	22	3,005,512	**11	**430,914
Less than \$100,000.....	**	**	3	78,594	**	**
\$100,000 under \$500,000.....	**8	**2,964,136	12	289,869	**11	**430,914
\$500,000 or more.....	**	**	7	2,637,049	**	**

Footnotes at end of table.

Federal Estate Tax Returns Filed for Nonresident Aliens, 1999 and 2000

Table 2.--Nonresident Alien Estate Tax Returns Filed in 2000: Gross Estate in the U.S., Outside the U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits by Tax Status and Size of U.S. Gross Estate--Continued

[Money amounts are in whole dollars]

Tax status, size of U.S. gross estate	Insurance, net value		Noncorporate business assets ⁷		Mortgages and notes	
	Number (19)	Amount (20)	Number (21)	Amount (22)	Number (23)	Amount (24)
All returns, total.....	**	**	9	3,436,590	3	1,480,626
Less than \$100,000.....	**	**	**	**	**	**
\$100,000 under \$500,000.....	**	**	**	**	**3	**1,480,626
\$500,000 or more.....	**	**	**9	**3,436,590	**	**
Nontaxable returns, total.....	--	--	3	173,650	--	--
Less than \$100,000.....	--	--	--	--	--	--
\$100,000 under \$500,000.....	--	--	**	**	--	--
\$500,000 or more.....	--	--	**	**	--	--
Taxable returns, total.....	**	**	6	3,262,940	3	1,480,626
Less than \$100,000.....	**	**	**	**	**	**
\$100,000 under \$500,000.....	**	**	**	**	**3	**1,480,626
\$500,000 or more.....	**	**	**6	**3,262,940	**	**

Tax status, size of gross estate, U.S.	Other assets		Funeral expenses		Executors' commissions	
	Number (25)	Amount (26)	Number (27)	Amount (28)	Number (29)	Amount (30)
All returns, total.....	21	10,495,844	28	186,388	7	294,398
Less than \$100,000.....	3	10,753	4	10,040	--	--
\$100,000 under \$500,000.....	10	309,994	14	73,580	**	**
\$500,000 or more.....	8	10,175,097	10	102,768	**7	**294,398
Nontaxable returns, total.....	5	368,110	6	36,381	--	--
Less than \$100,000.....	**	**	3	8,140	--	--
\$100,000 under \$500,000.....	**5	**368,110	3	28,241	--	--
\$500,000 or more.....	**	**	--	--	--	--
Taxable returns, total.....	16	10,127,734	22	150,007	7	294,398
Less than \$100,000.....	**	**	**	**	--	--
\$100,000 under \$500,000.....	**9	**302,322	**12	**47,239	**	**
\$500,000 or more.....	7	9,825,412	10	102,768	**7	**294,398

Tax status, size of U.S. gross estate, U.S.	Attorneys' fees		Other expenses/losses		Debts and mortgages	
	Number (31)	Amount (32)	Number (33)	Amount (34)	Number (35)	Amount (36)
All returns, total.....	21	307,590	50	1,938,247	19	2,895,367
Less than \$100,000.....	**	**	10	49,784	6	340,896
\$100,000 under \$500,000.....	**14	**138,874	25	549,685	6	324,137
\$500,000 or more.....	6	168,716	15	1,338,778	5	2,230,334
Nontaxable returns, total.....	6	32,353	14	1,061,730	8	437,732
Less than \$100,000.....	**	**	6	13,858	**8	**437,732
\$100,000 under \$500,000.....	**6	**32,353	**7	**1,017,872	**	**
\$500,000 or more.....	--	--	**	**	**	**
Taxable returns, total.....	15	275,237	36	876,517	11	2,457,635
Less than \$100,000.....	--	--	4	35,926	--	--
\$100,000 under \$500,000.....	9	106,521	19	367,980	6	227,301
\$500,000 or more.....	6	168,716	13	472,611	5	2,230,334

Footnotes at end of table.

