

# Federal Taxation of Wealth Transfers, 1992-1995

by Martha Britton Eller

**T**he estate tax, applied to wealth transfers at death, is the fundamental component in the Federal transfer tax system, a system which acts as the only vehicle for wealth taxation in the U. S. tax structure. Modern transfer taxes, which also include gift and generation-skipping transfer taxes, were enacted by Congress to meet a number of legislative objectives: to reduce concentration of wealth, to reduce erosion of the Federal income tax base, and to yield Federal revenue. Estate tax data collected by the Statistics of Income Division (SOI) of the Internal Revenue Service facilitate the study of these legislative goals and provide a glimpse into various forms of individual economic behavior, including wealth accumulation and charitable giving.

The Federal estate tax is applied to estates for which gross assets, at a decedent's date of death, exceed the \$600,000 filing threshold established by the Economic Recovery Tax Act (ERTA) of 1981 and effectively introduced in 1987. For 1992, the latest year of death estimates available from SOI, 60,082 individuals died with gross estates at or above the estate tax filing threshold [1]. Combined total gross estate, wealth accumulated, for these estate tax decedents exceeded \$104.4 billion, a 19.3 percent increase since year of death 1989, with its combined total gross estate of \$87.6 billion. The number of returns filed in each of six gross estate categories, as well as the combined total gross estate for each category, also increased between 1989 and 1992 (see Figure A). The largest growth in number of returns filed occurred in the \$600,000 to \$1 million category, with a 21.4 percent increase between 1989 and 1992. The \$20 million and above category experienced the largest growth in combined total gross estate, with a 23.9 percent increase between 1989 and 1992.

The number of estate tax returns filed increased annually between filing years 1992 and 1995. An estimated 59,176 estate tax returns were filed for decedents in 1992, 60,207 were filed in 1993, 68,595 were filed in 1994, and 69,772 were filed in 1995. The combined total gross estate for all estate tax decedents also increased annually during this period, although the rate of increase slowed with each year. For 1995, combined assets for estate tax decedents reached \$117.7 billion, a 19.1 percent increase over 1992, a 13.5 percent increase over 1993 and a 0.6 percent increase over 1994.

In terms of Federal revenue, estate and gift tax inlays represent an estimated 1 to 2 percent of annual Federal budget receipts from 1955 to 1995, according to the Office

of Management and Budget [2]. Estate tax receipts for filing years 1992, 1993, 1994, and 1995 totaled \$10.1 billion, \$10.3 billion, \$12.4 billion, and \$11.8 billion, respectively, according to recent estimates [3]. The number of returns with estate tax liability increased each year between filing years 1992 and 1994 but decreased between filing years 1994 and 1995. An estimated 27,397 returns with tax liability were filed in 1992, while 27,506 were filed in 1993, and 31,918 were filed in 1994. The number of returns with tax liability decreased, by 354, to 31,564 returns in filing year 1995.

For year of death 1992, Federal estate tax revenue exceeded \$10.5 billion, up 17.1 percent over year of death 1989 [4]. The number of estates with estate tax liability also increased, by 18.3 percent, between years of death 1989 and 1992. For 1989, 23,034 estates paid estate tax, while 27,243 estates paid the tax for 1992 death transfers.

## Estate Taxation A Brief History

The modern transfer tax system follows a long history of death taxation which began as early as 700 B.C. in ancient Egypt [5]. Some seven centuries later, at the turn of the 1st century A.D., Roman Emperor Caesar Augustus imposed the *Vicesima Hereditatium*, a transfer tax on successions and legacies to all but close relatives [6]. During the Middle Ages in feudal England, the king owned all real property, and he granted its use to certain individuals during their lifetimes. At the death of a grantee, the king permitted the grantee's estate to retain the property if an estate tax was paid. Otherwise, the granted property returned to the king [7].

In America, the first death tax was enacted by the Stamp Act of 1797, which provided for revenue to finance the undeclared naval war with France in 1794. Federal stamps were required on wills offered for probate, on inventories, letters of administration, receipts, and discharges for legacies and intestate distributions of property [8]. A Federal inheritance tax, enacted by the Tax Act of 1862, provided revenue for the funding of the Civil War. The 1862 Act included a document tax on the probate of wills and letters of administration, as well as a tax on the privilege of inheritance. In 1864, Congress reenacted the 1862 Revenue Act with the Internal Revenue Law of 1864, which added a succession tax, a tax on bequests of real property; an increase in legacy tax rates applied to transfers of personal property; and a tax applied to transfers of real property made during a decedent's life for less than adequate consideration, the nation's first gift tax.

The 1864 Act introduced several features which later formed the foundation of the modern transfer tax system: the exemption of small estates, the taxation of certain

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**Figure A**

## Number of Returns and Total Gross Estate, by Size of Gross Estate, 1989 and 1992 Decedents

[Money amounts are in thousands of dollars]

Size of gross estate	1989		1992		Percent of change	
	Number	Total gross estate	Number	Total gross estate	Number	Total gross estate
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Total.....</b>	<b>50,434</b>	<b>87,589,286</b>	<b>60,082</b>	<b>104,453,728</b>	<b>19.1</b>	<b>19.3</b>
Size of gross estate						
\$600,000 under \$1 million.....	26,142	19,981,434	31,724	24,329,330	21.4	21.8
\$1 million under \$2.5 million.....	18,486	27,209,505	21,489	31,600,054	16.2	16.3
\$2.5 million under \$5 million.....	3,691	12,494,565	4,469	15,276,723	21.1	22.3
\$5 million under \$10 million.....	1,408	9,451,483	1,608	10,925,991	14.2	15.6
\$10 million under \$20 million.....	459	6,211,867	529	7,155,584	15.2	15.2
\$20 million or more.....	248	12,240,433	263	15,166,045	6.0	23.9

lifetime transfers that were testamentary in nature, the special treatment of bequests to the surviving spouse, and tax deductions for bequests to charitable organizations [9]. The 1864 tax was repealed in 1870. In 1898, Congress passed the War Revenue Act of 1898, which reintroduced a transfer tax to provide revenue for the Spanish American War. The 1898 tax was applied to the estate of the decedent, not to the bequests of estate beneficiaries. The tax was repealed in 1902 at the end of the war.

While Congressional debate surrounding the place of transfer taxation continued, no further legislative action was taken until 1916 when the Federal Government faced a mounting deficit, the result of World War I. On September 8, 1916, the U.S. Congress passed legislation to address the fiscal crisis. Congress enacted the Revenue Act of 1916, which introduced the modern Federal estate tax [10]. The estate tax was applied to the net estate, defined as gross estate less deductions, at the death of a decedent. Gross estate included personal and real property owned by the decedent, as well as life insurance payable to the estate, certain lifetime transfers, and transfers which took effect on or after death. Also included in the gross estate was all joint property, unless proof could be supplied supporting the contribution of a co-owner. A deduction was allowed for administrative expenses and losses, debts, claims, and funeral costs, as well as for expenses incurred for the support of the decedent's dependents during the estate's administration. The tax rates were graduated from 1 percent on the first \$50,000 of net estate to 10 percent on the portion exceeding \$5 million.

Since 1916, the basic structure of the modern Federal estate tax, as well as the law from which it is derived, has remained largely unchanged. However, in the eight decades that followed the Revenue Act of 1916, Congress has enacted several important additions to, and revisions of, the modern estate tax structure (see Figure D). The

most common revisions have been adjustments to the filing threshold, tax brackets, and marginal tax rates (see Figure C).

Recent legislative action that affects 1992-1995 estate tax statistics includes the passage of the 1993 Revenue Reconciliation Act. The 1993 Act, effective for death, *inter-vivos*, and generation-skipping transfers completed after Dec. 31, 1992, restored top marginal estate and gift tax rates to previous levels. Congress reinstated the top marginal rates, due to expire at the end of 1992 under the Omnibus Budget Reconciliation Act (OBRA) of 1987, "to raise revenue to address the Federal deficit, to improve tax equity, and to make the tax system more progressive," according to U.S. House and Senate committee reports [11]. Under the 1993 Act, the estate and gift tax rate applied to the portion of taxable transfers between \$2.5 million and \$3 million is 53 percent, while the tax applied to the portion of taxable transfers more than \$3 million is 55 percent. In addition, under the 1993 Act, the phase-out of graduated rates and unified credit applies to cumulative taxable transfers between \$10 million and \$21,040,000, instead of cumulative taxable transfers between \$10 million and \$18,340,000 under the 1987 OBRA [12].

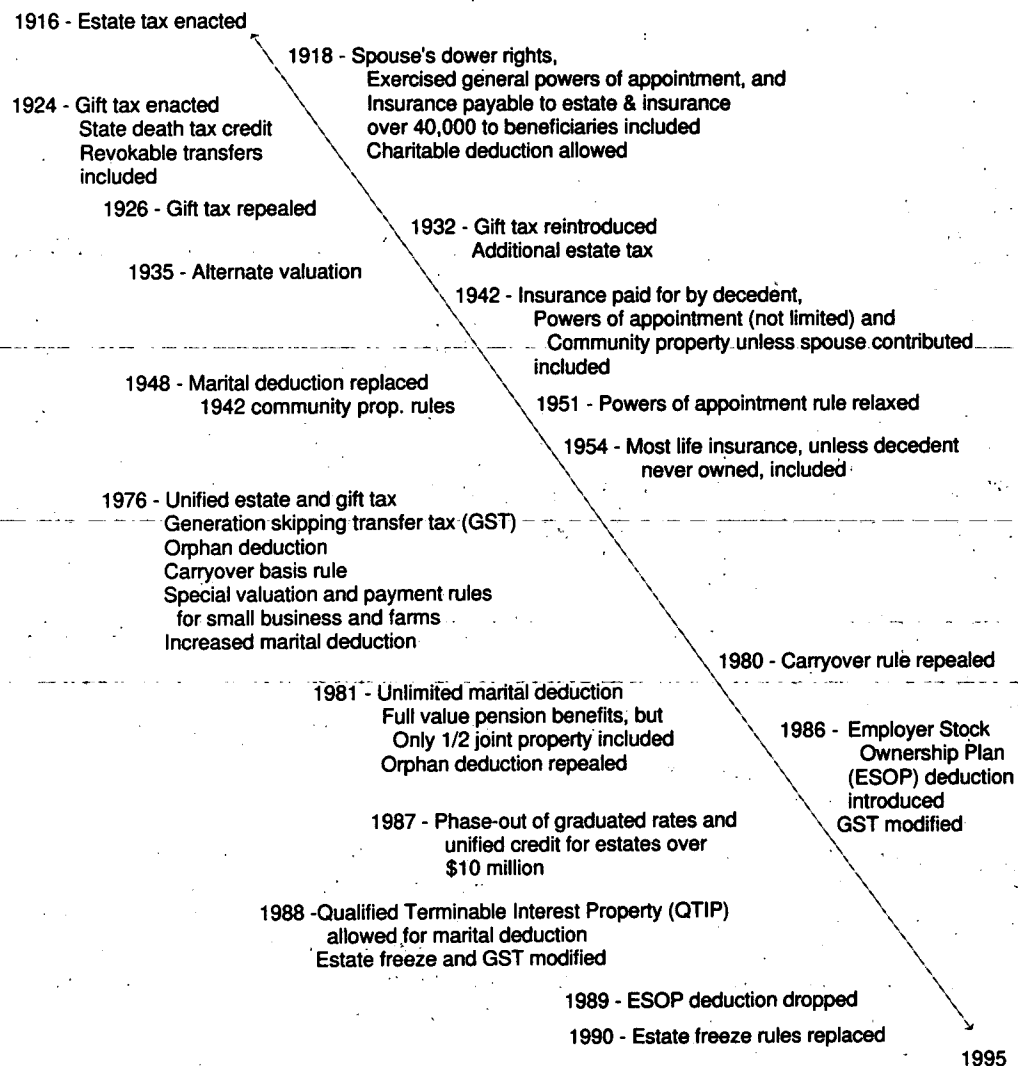
### Current Federal Estate Tax Law

The estate tax is one of three taxes that comprise the Federal unified transfer tax system, which also includes gift and generation-skipping transfer taxes. The Federal estate tax, described in Internal Revenue Code (IRC) section 2001, is neither a tax on property nor an inheritance tax on the receipt of property. Rather, the estate tax is a tax on the right to transfer property at death [13]. The modern gift tax, applied to lifetime transfers, or gifts, of property, was imposed by the Revenue Act of 1932 to

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**Figure B**

## Significant Tax Law Changes, 1916 - 1995



prevent estate tax avoidance schemes. Since passage of the Economic Recovery Tax Act of 1981, an individual may give up to \$10,000 per year with no Federal gift tax liability. The generation-skipping transfer (GST) tax, imposed by the Tax Reform Act (TRA) of 1976, ensures that the "transmission of hereditary wealth is taxed at each generation level" [14]. This additional tax is applied to the value of property placed in trust for the benefit of an individual or individuals two or more generations below that of the decedent. Prior to TRA of 1976, assets transferred into a GST trust were taxed only at the deaths of the trust's ultimate beneficiaries; intervening beneficiaries

paid no estate tax on trust assets. The 1976 tax act provided for treating the creation of GST trusts as taxable events; distributions from the principal of GST trusts and the termination of income interests in such trusts are also taxable events under generation-skipping tax law. Qualifying transfers in excess of \$1 million at the decedent's date of death are subject to the generation-skipping transfer tax. Since passage of TRA of 1976, estate and gift taxes have shared a unified framework of graduated and progressive tax rates, while the generation-skipping transfer tax applies the maximum Federal estate tax rate to taxable generation-skipping transfers.

# Federal Taxation of Wealth Transfers, 1992-1995

**Figure C**

## Estate Tax Filing Requirements and Tax Rates, 1916-1995

Year	Basic tax				Supplemental tax			
	Exemption amount	Initial rate (percent)	Top rate (percent)	Top bracket amount	Exemption amount	Initial rate (percent)	Top rate (percent)	Top bracket amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1916.....	50,000	1	10	5,000,000	N/A	N/A	N/A	N/A
1917.....	50,000	2	25	10,000,000	N/A	N/A	N/A	N/A
1918-23.....	50,000	1	25	10,000,000	N/A	N/A	N/A	N/A
1924-25.....	50,000	1	40	10,000,000	N/A	N/A	N/A	N/A
1926-31.....	100,000	1	20	10,000,000	N/A	N/A	N/A	N/A
1932-33.....	100,000	1	20	10,000,000	50,000	1	45	10,000,000
1934.....	100,000	1	20	10,000,000	50,000	1	60	10,000,000
1935-39.....	100,000	1	20	10,000,000	40,000	2	70	50,000,000
1940 <sup>1</sup> .....	100,000	1	20	10,000,000	40,000	2	70	50,000,000
1941.....	100,000	1	20	10,000,000	40,000	3	77	10,000,000
1942-53.....	100,000	1	20	10,000,000	60,000	3	77	10,000,000
1954-76.....	60,000	3	77	10,000,000	N/A	N/A	N/A	N/A
1977 <sup>2</sup> .....	120,000	18	70	5,000,000	N/A	N/A	N/A	N/A
1978.....	134,000	18	70	5,000,000	N/A	N/A	N/A	N/A
1979.....	147,000	18	70	5,000,000	N/A	N/A	N/A	N/A
1980.....	161,000	18	70	5,000,000	N/A	N/A	N/A	N/A
1981.....	175,000	18	70	5,000,000	N/A	N/A	N/A	N/A
1982.....	225,000	18	65	4,000,000	N/A	N/A	N/A	N/A
1983.....	275,000	18	60	3,500,000	N/A	N/A	N/A	N/A
1984.....	325,000	18	55	3,000,000	N/A	N/A	N/A	N/A
1985.....	400,000	18	55	3,000,000	N/A	N/A	N/A	N/A
1986.....	500,000	18	55	3,000,000	N/A	N/A	N/A	N/A
1987-95 <sup>3,4</sup> .....	600,000	18	55	3,000,000	N/A	N/A	N/A	N/A

N/A-Not applicable.

<sup>1</sup> 10 percent war surtax added.

<sup>2</sup> Unified credit replaces exemption.

<sup>3</sup> Tax rate was to be reduced to 50 percent on amounts beginning in 1988, but was postponed until 1992, then repealed retroactively in 1993 and set permanently to the 1987 levels.

<sup>4</sup> Graduated rates and unified credits phased out for estates over \$10,000,000.

The estate tax is applied to estates for which gross assets, at a decedent's date of death, exceed the \$600,000 filing threshold effectively introduced in 1987. For estate tax purposes, the value of property included in gross estate is fair market value, defined as "the price at which the property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or to sell and both having reasonable knowledge of all relevant facts," according to Regulation 20.2031-1(b) of the Internal Revenue Code [15]. The gross estate comprises all property, whether real or personal, tangible, or intangible, including "all property in which the decedent had an interest at the time of his death and certain property transferred during the lifetime of the decedent without adequate consideration; certain property held jointly by the decedent with others; property over which the decedent had a general power of appointment; proceeds of certain insurance policies on the decedent's life; dower or curtesy of a surviving spouse; and certain life estate property for which the marital deduction was previously allowed" [16]. Specific items of gross estate include real estate, cash, stocks, bonds, businesses, and decedent-

owned life insurance policies. Assets of gross estate are valued at a decedent's date of death, unless the estate's executor or administrator elects to value assets at an alternate valuation date, within six months of the date of death, described in IRC section 2032. Alternate value may be elected only if the value of the estate, as well as the estate tax, is reduced between the date of death and the alternate date.

Next in the application of estate tax is the calculation of taxable estate, defined as gross estate less allowable deductions. Included in allowable deductions are administrative expenses, indebtedness, taxes, casualty loss, and charitable and marital transfers (IRC sections 2053, 2055, and 2056). Taxable estate and post-1976 taxable lifetime transfers are added together to yield the tentative tax base, or adjusted taxable estate, to which unified estate and gift tax rates are applied. An initial rate of 18 percent is applied to the first \$10,000 of adjusted taxable estate, while the maximum tax rate, 55 percent, is applied to that portion of adjusted taxable estate which exceeds \$3 million. The tentative estate tax is determined by the appropriate marginal tax rates and the tentative tax base. Gift

taxes paid on post-1976 transfers, as well as allowable credits against the estate tax, are subtracted from the tentative estate tax. Included in allowable credits are a credit for Federal gift taxes paid on pre-1977 transfers that are included in gross estate and credits for state death taxes, foreign estate taxes, taxes on prior transfers, and the unified credit (IRC sections 2010, 2014, and 2013). Since 1987, the unified credit of \$192,800 means an exemption for estates of \$600,000 or less. The residual of the tentative estate tax less post-1976 gift taxes and other allowable credits is the net Federal estate tax payable. An estate tax return, Form 706, is due nine months from the date of the decedent's death, although a 6-month extension may be allowed. Both estate tax liabilities and generation-skipping transfer tax liabilities are reported on Form 706.

## 1992 Decedents: Demographic Data

In 1992, 60,082 individuals died with gross estates at or above the estate tax filing threshold of \$600,000 in gross assets. Estate tax decedents represented less than 1 percent of the total U.S. population in 1992, according to the U.S. Bureau of the Census, and the deaths of estate tax decedents represented 2.8 percent of all deaths that occurred during 1992 for resident Americans, according to the U.S. National Center for Health Statistics [17]. While females comprised 51.2 percent of the total U.S. resident population during 1992, the 1992 population of estate tax decedents included only 26,115 females, 43.5 percent of estate tax decedents, compared to 33,967 males, 56.5 percent of estate tax decedents. This pattern, exaggerated among estate tax decedents, reflects a sex-specific trend in the general U.S. population. Indeed, more American males than females die in every year, including 1992, according to data released by the U.S. National Center for Health Statistics [18]. In 1992, about 52 percent of the more than 2.1 million deaths for resident Americans were male deaths.

The ages of 1992 estate tax decedents follow life expectancy patterns observed in the U.S. population, with females outliving their male counterparts. However, the longevity of American women, evidenced in the general U.S. population, is even more pronounced in the population of 1992 estate tax decedents. While American women, on average, live 79.1 years, according to 1992 life expectancy data from the National Center for Health Statistics, female estate tax decedents lived, on average, 80.2 years [19]. Male estate tax decedents lived, on average, 74.6 years, almost six years less than female estate tax decedents. Yet, male estate tax decedents did exceed the life expectancy of their non-estate tax counterparts, since the average expected age at death for Ameri-

can males in 1992 was 72.3 years.

While the majority of the 1992 estate tax decedent population was male (56.5 percent), female decedents held a disproportionate share of the combined estate tax liability. Estate tax data for year of death 1992 reveal that, although male decedents held 61.5 percent of the more than \$104.4 billion in total gross estate for all estate tax decedents, female decedents assumed 55 percent of the combined net estate tax liability (see Figure D). Female decedents paid almost \$5.8 billion in combined estate taxes, while male decedents paid \$4.7 billion, although the average estate tax payment by female decedents who paid estate tax was \$369,552 and the average estate tax payment by male decedents who paid estate tax was \$407,548. At least part of this sex-specific differential in combined estate tax liability is attributable to the unlimited marital deduction, available to decedents who are married at death. Under the marital deduction, the first spouse to die may leave an unlimited amount of property to the surviving spouse and, thereby, postpone payment of estate taxes until the death of the second spouse. And, since the largest group of male decedents in the 1992 estate tax decedent population was married males, it seems reasonable that these male decedents used the marital deduction to avoid estate taxation, at least until the deaths of their surviving spouses.

Indeed, 22,336 estate tax decedents, 65.8 percent of male estate tax decedents and 37.2 percent of all estate tax decedents, were married males, with an average total gross estate of \$2.0 million (See Figure E). Only 6,247 females were married at death, representing 23.9 percent of female estate tax decedents and 10.4 percent of all estate tax decedents. The average total gross estate for these married females was more than \$1.5 million. The majority of female decedents (16,063 women) were widowed at death.

**Figure D**

## 1992 Estate Tax Decedents, Selected Items by Sex of Decedent

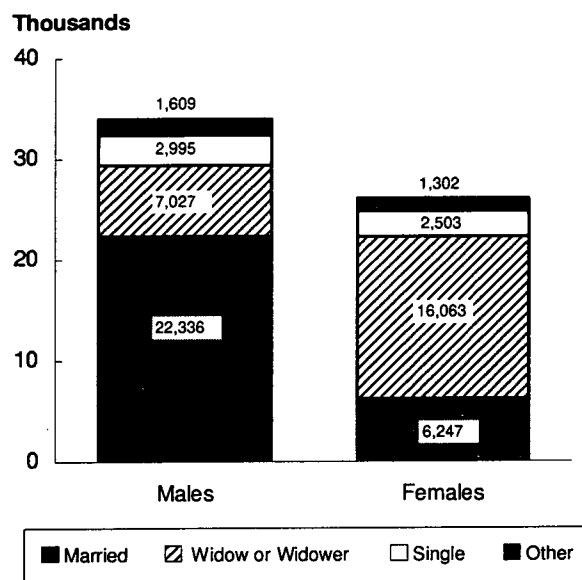
(Money amounts are in thousands of dollars)

Item	All decedents	Male decedents	Female decedents
	(1)	(2)	(3)
Number of returns.....	60,082	33,967	26,115
Gross estate, date-of-death.....	104,453,728	64,284,415	40,169,312
Allowable deductions.....	47,337,924	36,411,755	10,926,167
Net estate tax.....	10,507,768	4,727,965	5,779,803

NOTE: Detail may not add to totals because of rounding.

**Figure E**

## 1992 Estate Tax Decedents, by Sex and Marital Status of Decedent



These women represented 61.5 percent of female estate tax decedents and 26.7 percent of all decedents. Their average total gross estate was \$1.6 million. The estates of these women, probable recipients of non-taxable marital bequests by previously deceased husbands, were responsible for postponed estate tax liabilities.

The marital status of 1992 estate tax decedents follows expected patterns for individuals in their later years. While 47.6 percent of 1992 estate tax decedents were married at death, 38.4 percent were widowed. In the general U.S. population of adults 25 or older, 64.3 percent are married or married with spouse absent, while only 8.1 percent are widowed, according to 1994 estimates by the U.S. Bureau of the Census [20]. The third largest group of estate tax decedents, 9.2 percent of all decedents, were single, while 14.6 percent of the general U.S. adult population is single. The remaining less than 5 percent of estate tax decedents were separated, divorced or marital status unknown. About 13 percent of the adult population in the U.S. is separated or divorced.

### 1992 Decedents: Asset Data

In the course of the Estate Study, detailed asset data are extracted from each estate tax return included in the study. Assets are assigned to one of more than 20 asset categories, which allows estimates of total holdings by asset type for the population of estate tax decedents to be produced. Asset data provide a glimpse into wealth-holding patterns

of the wealthy, individuals with at least \$600,000 in gross assets at death.

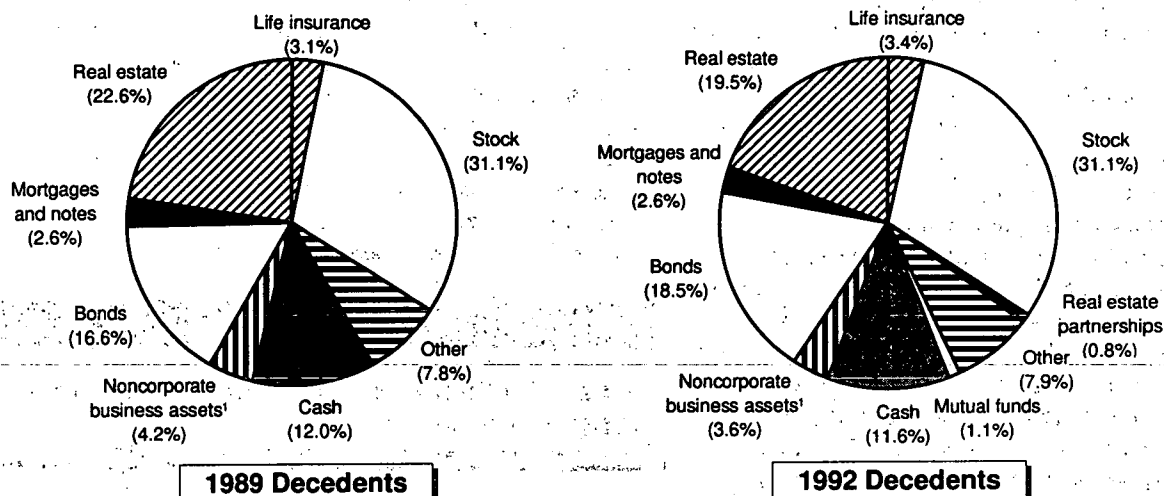
The population of 1992 estate tax decedents held more than \$32.4 billion in corporate stock, an investment which represented 31.1 percent of combined gross estate and the largest total investment for 1992 estate tax decedents. Stock holdings included a total investment of \$8.1 billion in the stock of closely held corporations (see Figure F). The second largest investment category for 1992 was real estate, which includes the value of personal residences. Decedents held 19.5 percent of combined gross estate in real estate, a total investment of more than \$20.3 billion. Holdings in a variety of bonds was the third largest total investment for 1992 estate tax decedents, at 18.5 percent of combined gross estate. Included in the bonds category are corporate, foreign, Federal, State, and local bonds. Also included are mixed bond funds, mutual funds composed of a combination of bond types. Decedents invested more than \$13.0 billion, 67.4 percent of bond holdings, in tax-exempt State and local bonds. The fourth largest investment category was cash, with total cash holdings that exceeded \$12.0 billion, 11.6 percent of combined total gross estate. Remaining investments for 1992 estate tax decedents were distributed fairly evenly between non-corporate business assets, mortgages and notes, life insurance, and other assets, a category which includes annuities, art, depletable and intangible assets, such as copyrights, and assets not included in other categories.

Three asset categories were introduced for study years 1992-1995: bond funds (see above), real estate partnerships, and unclassifiable mutual funds. Included in the real estate partnership category are all partnerships or noncorporate businesses based in the ownership of real estate. Real estate partnerships were less than 1 percent of combined gross estate for 1992 estate tax decedents. The unclassifiable mutual funds category includes mutual funds which contain a variety of investment instruments, as well as mutual funds comprised of unknown assets. Only 1.1 percent of combined gross estate was held in these mutual funds. Data collected for future study years will allow comparisons with 1992 figures in these new categories.

The composition of combined gross estate for 1992 decedents did not change significantly from the composition of gross estate for 1989 year of death decedents (see Figure F). In fact, the four largest investment categories in 1989 appeared as the largest categories in 1992. Corporate stock holdings, the largest asset category, did not change as a percentage of gross estate between 1989 and 1992 (31.1 percent). Real estate investments, which accounted for 22.6 percent of combined gross estate in 1989, dropped to 19.4 percent of combined gross estate in

**Figure F**

## Composition of Gross Estates, 1989 and 1992 Decedents



1992. The addition of a real estate partnerships category for 1992-1994 may account for some portion of the decrease in real estate holdings. The third-largest category, bond investments, comprised 18.5 percent of gross estate for 1992, up from 16.6 percent in 1989. This result was unexpected, because the addition of an unclassifiable mutual funds category for year of death 1992 should have reduced the holdings in bond investments between 1989 and 1992, since most assets included in that category were included in State and local bonds in 1989. The fourth largest asset category, cash holdings, did not experience a significant change between 1989 and 1992, 12.0 percent of gross estate in 1989 compared to 11.6 percent in 1992.

### 1992 Decedents: Selected Data for Farms and Closely Held Businesses

Under Internal Revenue Code section 2032A, an estate may elect to value a decedent's farm or closely held business realty at its "special," or current, use rather than at its fair market value. While fair market value is determined on the basis of the property's highest and best use, the special use value is the property's value as a farm or closely held business [21]. For example, the highest and best use for a real estate property may be its use as a housing development site, which could inflate the current value of the property. Special use valuation, then, is an attempt to capture the value of the property to the decedent, and qualified heir, at the time of the decedent's

death. The special use valuation cannot reduce the value of the gross estate by more than \$750,000 for decedents dying in or after 1983.

Of course, an estate must meet certain requirements to qualify for special use valuation. The decedent must have been a U.S. citizen or resident and the real property must be located in the United States. The real and personal property of the farm or closely held business must be at least 50 percent of the gross estate, less expenses, and 25 percent of the adjusted value of the gross estate [22]. The real property must pass to a qualified heir—a spouse, child, or close relative, and the property must have been owned by the decedent or a family member and used as a farm or in the closely held business for five of the last eight years before the decedent's death. Finally, the decedent, or a member of his or her family, must have materially participated in the farm or business operations in five out of the eight years prior to the decedent's death [23]. An estate's election of special use valuation is a binding agreement under local law. Therefore, if the qualified heir sells or transfers the property to nonfamily members within 10 years of the decedent's death, or if the property is no longer used for farming or other closely held business purposes, the estate tax benefits of the original special use election are recaptured.

While 32,752 estates of 1992 estate tax decedents held more than \$12.8 billion in real estate assets, including any farm real estate that could be separated from the value of

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farm businesses, only 305 estates (1.1 percent of estates with tax liability) elected special use valuation for farm or closely held business realty under IRC section 2032A. For estates with \$600,000 to \$1 million in gross assets, 175 estates elected special use valuation, while only 130 estates of \$1 million or more in gross assets elected the special use valuation (see Figure G). The total fair market value of special use property was more than \$300.8 million, while the adjusted, special use value of that property was more than \$128.4 million, representing a \$172.4 million dollar reduction in combined total gross estate.

Under section 6166 of the Internal Revenue Code, an estate may elect to defer all or part of its estate tax liability if the gross estate includes the value of an interest in a closely held business, and the value of that interest exceeds 35 percent of the adjusted gross estate. The estate tax payable on the value of the closely held business may be deferred for up to 14 years, including annual interest payments for four years, followed by up to 10 annual installments of principal and interest [24].

An estate may qualify for estate tax deferral in three ways. The closely held business interest may be an "interest as a proprietor in a business carried on as proprietorship," an "interest as a partner in a partnership carrying on a trade or business if at least 20 percent of the total capital interest in the partnership is included in the gross estate or the partnership had 15 or fewer partners," according to IRC section 6166(b)(1) [25]. Finally, a decedent's "stock in a corporation carrying on a trade or business can qualify if at least 20 percent in value of the voting stock of the corporation is included in the decedent's gross estate or the corporation had 15 or fewer shareholders," [26].

Again, as with the election of special use valuation, only a small number of estates for 1992 decedents elected to defer estate tax payments under IRC section 6166. Only 716 estates, 2.6 percent of estates with tax liability, elected the deferral (see Figure H). The gross estate category with

the largest number of section 6166 deferrals was the \$1 million to \$5 million category, with 462 deferrals—64.5 percent of all elected deferrals. More than \$519.0 million in estate taxes were deferred by 1992 estate tax decedents, representing 61.5 percent of estate taxes paid by those decedents who elected tax deferrals plans and only 5.0 percent of estate taxes paid by all 1992 estate tax decedents. Estates in the \$5 million or more gross estate category deferred 66.3 percent of all deferred estate taxes. And, of decedents electing deferrals, decedents in the \$5 million or more category paid the largest percentage of total estate tax, at 67.6 percent.

**Figure H**

### Estates of 1992 Decedents Electing a Code Section 6166 Tax Deferral

[All figures are estimates based on samples—money amounts are in whole dollars]

Size of gross estate	Number	Tax deferred	Estate tax
	(1)	(2)	(3)
Total.....	716	519,044,420	844,289,070
\$600,000 under \$1 million.....	119	8,520,670	12,689,080
\$1 million under \$5 million.....	462	166,302,270	260,742,970
\$5 million or more.....	135	344,221,480	570,857,020

### The Macroeconomy and Federal Estate Taxation, 1989-1992

Between year of death 1989 and year of death 1992, the number of estate tax filers, as well as their combined total gross estate, increased overall and for each gross estate category (see Figure A). Total estate tax filers increased 19.1 percent between 1989 and 1992, while combined gross estate increased 19.3 percent. With the exception of the \$20 million or more category, which grew by 6 percent in number of returns filed, all gross estate categories increased between 14.2 percent and 21.4 percent in number of returns filed between 1989 and 1992. Growth in combined total gross estate paralleled the growth in number of returns filed in all categories, except the top category, where the percentage increase in total gross estate (23.9 percent) far exceeded growth in the number of filers (6 percent). Price increases during the period 1989-1992 may explain a portion of the increased asset valuations for estates in 1992 and, therefore, the increased number of 1992 estate tax filers.

Inflation, defined as an increase in the overall national price level, increased between 1989 and 1992. The chain-type price index for gross domestic product (GDP), one measure of inflation, increased 11.5 percent between 1989 and 1992 [27]. Stock prices also increased over the period

**Figure G**

### Estates of 1992 Decedents Electing Special Use Valuation

[All figures are estimates based on samples—money amounts are in whole dollars]

Size of gross estate	Number	Fair market value	Adjusted value	Reduction in value
	(1)	(2)	(3)	(4)
Total.....	305	300,814,050	128,462,300	172,351,750
\$600,000 under \$1 million....	175	134,749,630	44,621,240	90,128,390
\$1 million or more.....	130	166,064,420	83,841,060	82,223,360



1989-1992. The composite common stock price index for the N.Y. Stock Exchange reached 180.1 for 1989, its highest level since at least 1980 [28]. Then, between 1989 and 1992, the stock price index increased in every year. The 1992 composite stock price index was 229.0, a 27.2 percent increase since 1989. Bond prices dropped and then rose between 1989 and 1992, producing an overall increase in bond prices during the period. The yearly high for 1992 bond prices was 103.9, while the yearly low was 98.4, up 10.3 percent and 12.6 percent, respectively, since 1989, where yearly high and yearly low figures are based on a Dow Jones average price of 10 utility bonds and 10 industrial bonds [29].

Assets included in a decedent's gross estate are valued at their fair market values. Therefore, price indices for the period 1989-1992 provide a measure of the expected change in asset valuations. Price indices for goods and services, as measured by the chain-type price index for GDP, and for stocks and bonds suggest that asset valuations should have increased between 1989 and 1992.

And, in fact, they did. Combined total gross estate increased for each gross estate category. Increased valuations moved 1992 decedents into the population of estate tax filers with gross assets at or above \$600,000. And, growth in the number of filers was observed in each of the other gross estate categories, as well. While different patterns of individual economic behavior, especially wealth accumulation, may have characterized decedents in 1989 and 1992, at least some portion of the increased wealth of the decedent population since 1989 is attributable to macroeconomic forces, such as increasing prices.

## 1992 Decedents: Deduction Data

Deductions allowed in the calculation of taxable estate, defined as gross estate less deductions, include funeral expenses, executors' commissions, attorneys' fees, other administrative expenses and losses, debts and mortgages, medical debts, bequests to surviving spouses, and charitable contributions. For 1992 estate tax decedents, total deductions exceeded \$47.3 billion, representing 45.3 percent of combined total gross estate. Estates with tax liabilities deducted \$16.1 billion from gross estate, while estates with no tax liabilities deducted \$31.2 billion from gross estate (see Figures I and J). The deduction for bequests to surviving spouse was the largest deduction taken by 1992 estate tax decedents. These marital bequests comprised 67.8 percent of combined deductions for all decedents. For nontaxable estates, marital bequests represented 79.2 percent of combined deductions, while such bequests represented only 45.7 percent of combined deductions for taxable estates. The deduction for marital

bequests, then, contributed to, if not determined, the tax status of estate tax returns for 1992 decedents.

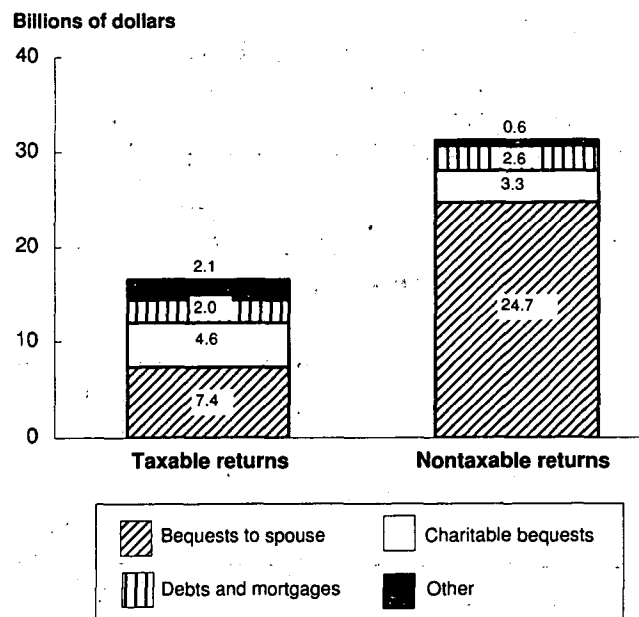
The deduction for charitable contributions, the second largest deduction category, accounted for 16.9 percent of combined deductions for all decedents. The charitable deduction was 10.7 percent of combined deductions for non-taxable estates and 28.8 percent of combined deductions for taxable estates. Other deductions from gross estate for 1992 estate tax decedents include \$4.5 billion for other debts and mortgages, \$330.3 million for funeral expenses, \$1.7 billion for executor and attorney fees, and \$737.9 million for other administrative expenses.

Deduction patterns for 1992 decedents followed those for 1989 decedents, with a few exceptions. For year of death 1989, combined deductions, \$38.6 billion, accounted for 44.0 percent of combined gross estate, compared to 45.3 percent in 1992. The deduction for marital bequests and the deduction for charitable contributions were the largest and second largest deduction categories, respectively, for both years of death. The marital bequest deduction accounted for 69.0 percent of all deductions for 1989 decedents, compared to 67.8 percent in 1992. Charitable contributions were 14.7 percent of total deductions in 1989 and 16.9 percent in 1992.

Data by tax status reveal that deduction patterns for marital and charitable bequests did not change between 1989 and 1992 years of death for non-taxable estates. The

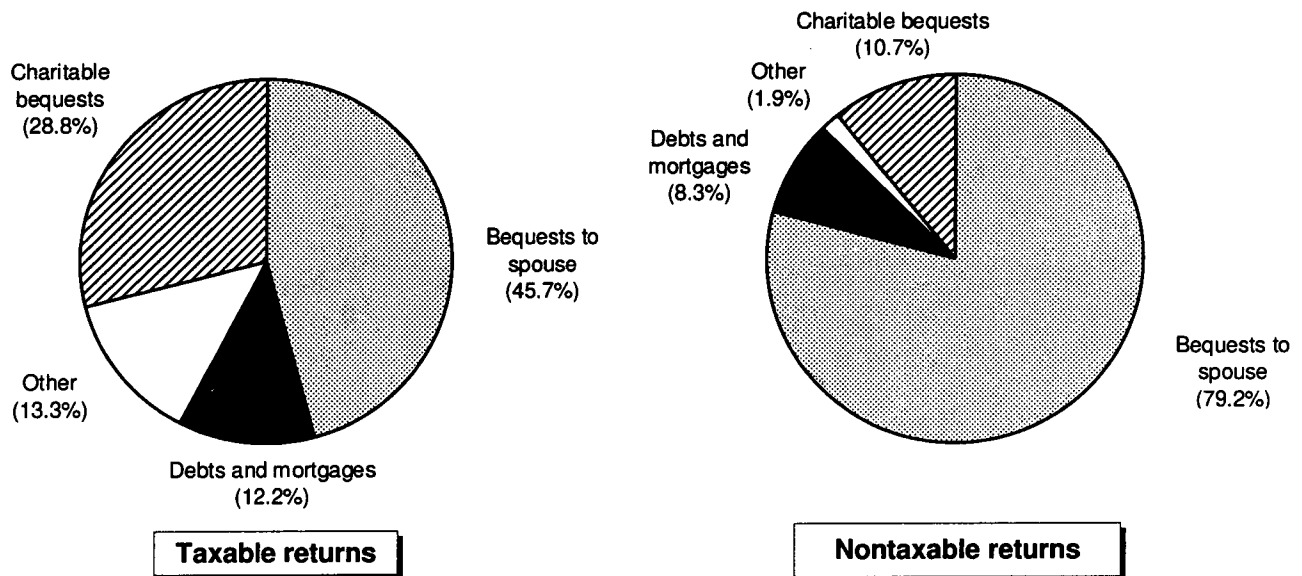
Figure I

## Deductions Claimed for 1992 Decedents, by Tax Status of Estate



**Figure J**

## Deductions as a Percentage of Total Deductions, by Tax Status of Estate



percentage of total deductions for marital bequests and charitable bequests were 79.2 percent and just over 10.5 percent, respectively, for both years. For taxable estates, however, a shift from marital deductions to charitable deductions was observed between 1989 and 1992. Marital bequests represented a smaller percentage of combined deductions in 1992 compared to 1989, 45.7 percent and almost 50.0 percent, respectively. And, charitable bequests for taxable estates represented a larger percentage of combined deductions in 1992 compared to 1989, 28.8 percent compared to 22.5 percent, respectively. The observed shift from marital to charitable bequests may be due to the increasing number and variety of planned-giving options available to estates, including charitable remainder trusts and charitable lead trusts, both of which provide estate tax benefits [30].

### 1992 Decedents: Charitable Giving Data

Under Internal Revenue Code section 2055, the "value of the taxable estate shall be determined by deducting from the value of the gross estate the amount of all bequests, legacies, devises or transfers" (IRC section 2055) to qualifying charitable institutions, including organizations which conduct religious, charitable, scientific, literary and educational activities, among others. As part of the Estate Study, detailed data on gross charitable contributions by estate tax decedents are collected. Each contribution is

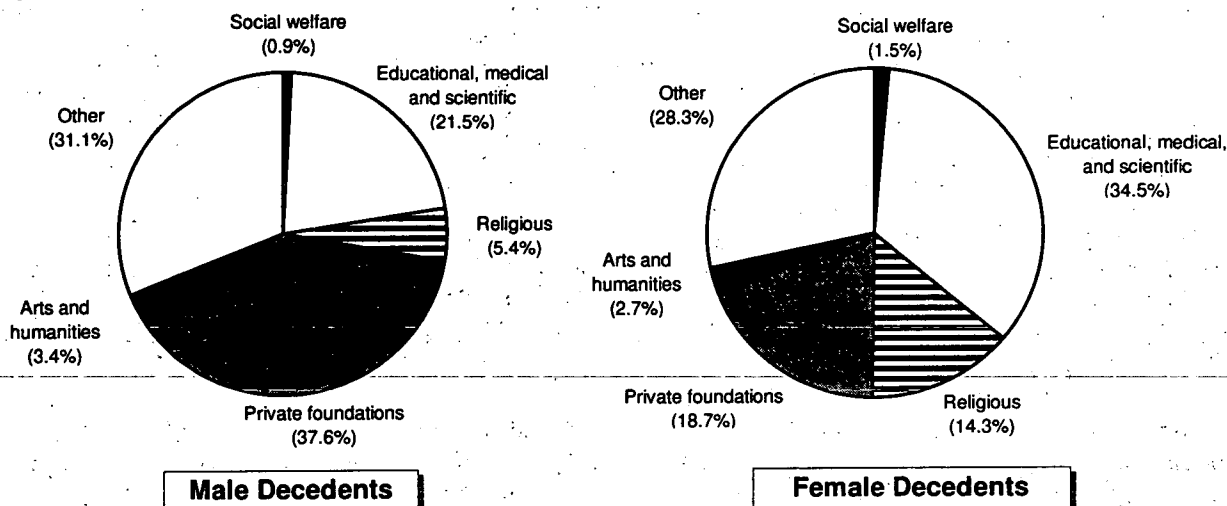
assigned to one of six contribution categories, and each category describes a general activity performed by qualifying charitable institutions. Categories include: education, medicine, and science; religion; social welfare; private foundations; arts and humanities; and other, a category for contributions to charitable organizations not includable elsewhere.

For year of death 1992, 11,236 decedents (18.7 percent of the estate tax decedent population) contributed to charitable organizations. Gross contributions exceeded \$8.4 billion. The largest combined contribution, \$2.5 billion, went to organizations in the other category, representing 29.8 percent of gross charitable contributions. The second largest combined contribution, \$2.4 billion, was to private foundations, a combined gift which represented 28.8 percent of gross charitable contributions. Educational, medical, and scientific organizations received the third largest combined contribution, \$2.3 billion, or 27.5 percent of gross contributions. The largest number of contributions, 6,843, were made to religious organizations.

Charitable contribution data by sex suggest that male and female decedents, as charitable donors, ascribe to different giving patterns. While both men and women most often contributed to religious organizations, 2,649 contributions by men and 4,194 contributions by women, the average size of religious contributions was much larger for women than for men. Men contributed, on average,

Figure K

## Recipients of Charitable Bequests, by Sex of 1992 Decedents



NOTE: All percentages are based on amounts of charitable bequests made by decedents.

\$92,585 to religious organizations, while women, on average, contributed \$134,833. In terms of contribution amounts, men gave the largest percentage of their gross contributions (37.6 percent) to private foundations. Women, however, gave the largest percentage of their gross contributions (34.5 percent) to educational organizations (see Figure K).

The size of individual charitable contributions by both male and female donors was most often less than \$250,000. In fact, 72.8 percent of contributions by men and 65.9 percent of contributions by women were less than \$250,000 (see Figure L). Contributions of \$10 million or more were made by 1.2 percent of male donors and 0.9 percent of female donors.

Charitable contribution data by size of net worth, defined as assets less liabilities, reveal that 1992 estate tax

decedents who were donors contributed 27.1 percent of their total net worth to charitable organizations (see Figure M). Male donors contributed 26.7 percent of their combined net worth, while female donors contributed 27.6 percent of their combined net worth. The largest percentage of net worth (35.9 percent) was contributed by decedents with \$10 million or more in net worth. Decedents in this top net worth category gave \$4.4 billion in total contributions.

Marital status also influences a decedent's charitable giving. Single female decedents and single male decedents were most likely to contribute to charities. More than 41 percent of all single female decedents and almost a third of all single male decedents gave to charities. Widowed female decedents were the third most philanthropic group, followed by widowed male decedents, with 29.3 percent of

Figure L

## Charitable Donors by Size of Bequest and Sex of Donor, 1992

Size of bequest	All donors		Male donors		Female donors	
	Number	Percent	Number	Percent	Number	Percent
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Total</b> .....	11,236	100.0	4,655	100.0	6,581	100.0
Under \$250,000.....	7,728	68.8	3,389	72.8	4,338	65.9
\$250,000 under \$500,000.....	1,020	9.1	400	8.6	621	9.4
\$500,000 under \$1 million.....	1,372	12.2	405	8.7	967	14.7
\$1 million under \$10 million.....	1,002	8.9	403	8.7	599	9.1
\$10 million or more.....	115	1.0	58	1.2	57	0.9

NOTE: Detail may not add to totals because of rounding.

# Federal Taxation of Wealth Transfers, 1992-1995

**Figure M**

## Charitable Bequests as a Percentage of Net Worth, by Sex and Size of Net Worth, 1992 Donors

[Money amounts are in thousands of dollars]

Size of net worth	All donors			Male donors			Female donors		
	Number	Bequest amount	Percent of net worth	Number	Bequest amount	Percent of net worth	Number	Bequest amount	Percent of net worth
	(1)	(2)	(3)	(7)	(8)	(9)	(4)	(5)	(6)
<b>Total.....</b>	<b>11,236</b>	<b>7,982,106</b>	<b>27.1</b>	<b>4,655</b>	<b>4,304,195</b>	<b>26.7</b>	<b>6,581</b>	<b>3,677,911</b>	<b>27.6</b>
Under \$600,000.....	174	14,467	15.7	90	9,877	19.6	84	4,590	11.1
\$600,000 under \$1 million.....	5,160	814,934	20.5	1,890	211,056	14.3	3,270	603,878	24.2
\$1 million under \$5 million.....	5,058	2,031,613	21.0	2,225	757,341	17.4	2,833	1,274,272	23.9
\$5 million under \$10 million.....	506	730,509	21.0	265	338,263	18.2	242	392,246	24.1
\$10 million or more.....	338	4,390,584	35.9	186	2,987,658	35.5	152	1,402,925	36.9

Note: Detail may not add to totals because of rounding.

all widowed females and 25.1 percent of all widowed males contributing to charitable organizations. In contrast, married decedents were much less likely to make charitable contributions. Only 8.5 percent of married female decedents and 7.5 percent of married male decedents gave to charities. Faced with the decision to bequeath to charitable organizations or to family members, single decedents choose bequests to charities, while married decedents choose bequests to family.

In terms of monetary contributions, 1992 estate tax decedents who were widowed at death gave 55.2 percent of total charitable contributions, with more than \$4.6 billion in charitable bequests (see Figure N). Widowed males and widowed females gave \$1.6 billion and \$3.0 billion, respectively. However, in terms of net worth, males who were separated, divorced, or status unknown (other category) and single women gave the largest percentages of net worth for males and females, respectively. Males in the other category gave 33.2 percent of their

combined net worth to charities, and single women gave 21.3 percent of their combined net worth.

Age at death also is a factor in charitable giving by decedents. Decedents between ages 80 and 90 represented 45.6 percent of all contributors, with \$3.4 billion in gross contributions (see Figure O). The largest percentage of net worth, 33.8 percent, was given by decedents between ages 60 and 70.

Charitable giving patterns for 1992 estate tax decedents followed those for 1989 decedents. In 1989, 19.4 percent of estate tax decedents contributed to charitable organizations, while 1992 saw contributions by 18.7 percent of all estate tax decedents. For both years of death, men and women contributed most often to private foundations and educational organizations, respectively. Men's contributions to private foundations dropped slightly from 1989 to 1992, from 41.3 percent to 37.6 percent of gross contributions. Women's contributions to educational organizations remained fairly constant between the two years, from 33.5

**Figure N**

## Charitable Bequests as a Percentage of Net Worth, by Sex and Marital Status, 1992 Decedents

[Money amounts are in thousands of dollars]

Marital status	All decedents		Male decedents		Female decedents	
	Bequest amount	Percent of net worth	Bequest amount	Percent of net worth	Bequest amount	Percent of net worth
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Total.....</b>	<b>8,473,542</b>	<b>8.5</b>	<b>4,525,272</b>	<b>7.5</b>	<b>3,948,271</b>	<b>10.1</b>
Married.....	1,209,248	2.4	1,056,219	2.6	153,030	1.6
Widowed.....	4,674,014	12.6	1,646,391	13.7	3,027,623	12.1
Single.....	1,313,213	18.8	691,435	17.0	621,778	21.3
Other <sup>1</sup> .....	1,277,067	24.0	1,131,228	33.2	145,840	7.6

<sup>1</sup> "Other" includes legally separated, divorced, and marital status unknown.

Note: Detail may not add to totals because of rounding.

**Figure 0****Charitable Bequests as a Percentage of Net Worth, by Sex and Age, 1992 Donors**

(Money amounts are in thousands of dollars)

Age at death	All donors			Male donors			Female donors		
	Number	Bequest amount	Percent of net worth	Number	Bequest amount	Percent of net worth	Number	Bequest amount	Percent of net worth
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
<b>Total</b> .....	<b>11,236</b>	<b>8,473,542</b>	<b>28.8</b>	<b>4,655</b>	<b>4,525,272</b>	<b>28.0</b>	<b>6,581</b>	<b>3,948,271</b>	<b>29.7</b>
Under 50.....	157	76,375	22.6	111	57,742	24.4	46	18,633	18.6
50 under 60.....	184	120,681	22.7	125	83,887	20.1	60	36,794	32.3
60 under 70.....	724	778,923	33.8	458	616,054	38.2	266	162,869	23.6
70 under 80.....	1,972	1,587,495	23.5	914	1,069,006	22.9	1,058	518,489	24.7
80 under 90.....	5,118	3,356,456	29.1	1,926	1,321,312	25.0	3,192	2,035,144	32.6
90 and over.....	3,081	2,553,612	32.0	1,123	1,377,270	35.0	1,959	1,176,342	29.0

Note: Detail may not add to totals because of rounding.

percent of gross contributions in 1989 to 34.5 percent in 1992.

**Data Sources and Limitations**

Analysts in the Special Projects Section of SOI's Special Studies and Publications Branch, with SOI staff in the Ogden (Utah) Internal Revenue Service Center, conduct the Estate Study, which extracts demographic, financial, asset, and bequest data from Form 706, the Federal estate tax return. The Estate Study is conducted on an annual basis, which allows production of filing year data on estate taxation. By focusing on a single year of death for a period of three years, the study also allows production of year of death estimates. A single year of death is examined for three years in order to sample estate tax returns filed in years subsequent to the year of death. The Estate Study for the period 1992-1994 concentrates on year of death 1992, the latest year of death estimates available. Study years 1995-1997 will concentrate on year of death 1995.

For each study year, 1992-1995, a sample was selected from returns filed. Samples were limited to returns filed for decedents who died after 1981 with total gross estates of at least \$500,000. The \$500,000 threshold was used in order to include any delinquent returns filed for decedents dying before 1987. The sample for the 1992 filing year included 7,557 returns out of a total population of 59,176. In 1993, the year in which most returns for 1992 decedents were filed, 12,467 returns were sampled out of a total of 60,207. There were 8,506 returns out of 68,595 sampled during filing year 1994, and 8,903 returns out of 69,772 sampled during filing year 1995. Of the 28,530 returns sampled during 1992-1994, there were 11,943 returns filed for 1992 decedents.

Estate tax returns were sampled while the returns were being processed for administrative purposes, but before any audit examination. Returns were selected on a flow basis, using a stratified random probability sampling method, whereby the sample rates were preset based on the desired sample size and an estimate of the population. The design had three stratification variables: year of death, age at death, and size of total gross estate. For the 1992-1994 filing years, the year of death variable was separated into two categories: 1992 year of death and non-1992 year of death. Age was disaggregated into five categories: under 40, 40 under 50, 50 under 65, 65 under 75, and 75 and older (including age unknown). Total gross estate was limited to three categories: \$500,000 under \$1 million, \$1 million under \$5 million, and \$5 million or more. Sampling rates ranged from 3 percent to 100 percent. Returns for over half of the strata were selected at the 100 percent rate.

An examination of returns filed between 1982 and 1992 revealed that almost 99 percent of all returns for decedents who die in a given year are filed by the end of the second calendar year following the year of death. Further, the decedent's age at death and the length of time between the decedent's date of death and the filing of an estate tax return are related. Therefore, it was possible to predict the percentage of unfilled returns within age strata. The sample weights were adjusted accordingly, in order to account for returns for 1992 decedents not filed by the end of the 1994 filing year.

Since estate tax returns are processed after revenue processing but prior to audit, a new study has commenced at SOI to examine adjustments to estate tax figures during audit. This study, the 1992 Estate Post-Audit Study, investigates audit adjustments to estate tax returns filed

## Federal Taxation of Wealth Transfers, 1992-1995

during 1992 [31].

### Summary

The Federal estate tax, one of only three wealth transfer taxes in the modern U.S. tax structure, is applied to an estate for which gross assets, at date of death, exceed the \$600,000 filing threshold effective since 1987. For year of death 1992, 60,082 individuals, less than 1 percent of the total U.S. population in 1992, died with gross estates at or above the estate tax filing threshold. More than 56 percent of the 1992 decedent population were males, although females assumed 55 percent of the combined estate tax liability.

Combined total gross estate for all estate tax filers exceeded \$104.4 billion. The number of returns filed in each of six gross estate categories, as well as the combined total gross estate for each category, increased between 1989 and 1992. The number of estate tax filers increased 19.1 percent between 1989 and 1992, while combined gross estate increased 19.3 percent. At least some portion of the increased wealth between the two years of death is attributable to increasing price levels.

Investment in corporate stock, the largest total investment for 1992 estate tax decedents, represented 31.1 percent of combined gross estate. Decedents held 19.5 percent of combined gross estate in real estate, 18.5 percent in corporate, foreign, Federal, State, and local bonds, and 11.6 percent in cash.

More than 18 percent of the estate tax decedent population contributed to charitable organizations. Gross contributions exceeded \$8.4 billion. Men contributed the largest percentage of their gross contributions, 37.6 percent, to private foundations. Women gave the largest percentage of their gross contributions, 34.5 percent, to educational organizations.

### Explanation of Selected Terms

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

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

*Adjusted taxable gifts.*--Certain gifts made during the life of an individual who died before 1982 were automatically included in the 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."

*Bequests to surviving spouse.*--This was 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."

*Charitable deduction.*--This was the deduction allowable for 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 paid on a gift 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.

*Net estate tax.*--This was the tax liability of the estate remaining after subtraction of credits for State death taxes, foreign death taxes, credit for tax on prior transfers, and Federal gift taxes previously paid. In addition, a "unified credit," graduated according to the year of death and a "credit" for gift taxes paid on post-1976 gifts, is allowed (see also "unified credit").

*Net worth.*--Net worth was equal to total gross estate less mortgages and other debts calculated at decedent date of death.

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

*Other tax credits.*--This is the sum of all tax credits for foreign death taxes, Federal gift taxes and taxes on prior transfers taken as a deduction against the estate tax before credits.

*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 is the base to which the graduated Federal estate tax rates are 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.

**Total gross estate.**--An estate tax return was required in the case of every decedent whose gross estate at the time of death exceeded the legal filing requirement in effect for the year of death. For estate tax purposes, the gross estate included all property or interest in property before reduction by debts (except policy loans against insurance) and mortgages, or administrative expenses. Included in the gross estate were such items as real estate, tangible and intangible personal property, certain lifetime gifts made by the decedent, property in which the decedent had a general power of appointment, the decedent's interest in annuities receivable by the surviving beneficiary, the decedent's share in community property, life insurance proceeds (even though payable to beneficiaries other than the estate), dower or courtesy of the surviving spouse (inherited property) and, with certain exceptions, joint estates with right of survivorship and tenancies by the entirety. In this article, total gross estate refers to the value of assets at the date of the decedent's death.

**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] Because one year of death is the focus for a period of three years, in order to sample estate tax returns filed in years subsequent to the year of death, 1992 estate tax data are the latest year of death data available. This article concentrates primarily on year of death data for 1992. Filing year data for 1992-1995 also are available from Statistics of Income Division and provided in attached data tables, although few filing year data are discussed in the text of the article.
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- [3] For complete 1992-1993 filing year data, see tables at end of this article, or see Barry Johnson, "Estate Tax Returns, 1992-1993," *Statistics of Income Bulletin*, Spring 1995, Volume 14, Number 4.
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between 1989 estimates previously published and those that appear in the current article are the result of an improvement in population adjustment methodology.

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- [21] *United States Tax Reporter, Estate and Gift Taxes*, *ibid*.
- [22] See Internal Revenue Code section 2032A(e)(10) for an explanation of adjusted value.
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- [24] *Ibid*.
- [25] *Ibid*.
- [26] *Ibid*.
- [27] *Economic Report of the President*, United States Government Printing Office, Washington, D.C., 1996, p. 284, Table B-3, "Chain-type price indexes for gross domestic product, 1959-1995." Original data published by Department of Commerce, Bureau of Economic Analysis.
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# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1a.--Estate Tax Returns Filed in 1992: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Gross estate, tax purposes <sup>1</sup>		Type of property					
			Personal residence		Other real estate		Closely held stock	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All returns, total.....</b>	<b>59,176</b>	<b>98,850,462</b>	<b>33,793</b>	<b>7,130,902</b>	<b>34,618</b>	<b>13,670,391</b>	<b>7,504</b>	<b>6,101,496</b>
\$600,000 under \$1,000,000.....	31,374	24,117,000	16,646	2,455,534	17,351	3,775,030	2,251	476,744
\$1,000,000 under \$2,500,000.....	21,232	31,231,883	12,908	2,831,314	12,769	4,785,901	3,267	1,176,048
\$2,500,000 under \$5,000,000.....	4,310	14,708,242	2,719	929,786	2,863	2,136,506	1,176	1,029,914
\$5,000,000 under \$10,000,000.....	1,474	9,850,266	998	429,916	1,034	1,209,976	490	876,240
\$10,000,000 under \$20,000,000.....	531	7,291,498	350	251,162	397	920,546	211	735,430
\$20,000,000 or more.....	255	11,651,573	173	233,189	204	842,431	109	1,807,119
<b>Taxable returns, total.....</b>	<b>27,397</b>	<b>56,980,570</b>	<b>14,121</b>	<b>3,427,264</b>	<b>15,121</b>	<b>6,567,350</b>	<b>2,802</b>	<b>3,481,195</b>
\$600,000 under \$1,000,000.....	11,955	9,726,968	5,537	832,070	6,243	1,452,951	471	77,795
\$1,000,000 under \$2,500,000.....	11,333	16,667,625	6,071	1,446,131	6,226	2,275,638	1,285	458,597
\$2,500,000 under \$5,000,000.....	2,582	8,803,494	1,516	550,159	1,586	1,130,786	576	516,997
\$5,000,000 under \$10,000,000.....	930	6,265,986	612	259,143	615	618,632	250	400,222
\$10,000,000 under \$20,000,000.....	388	5,396,573	245	163,936	281	519,054	138	480,125
\$20,000,000 or more.....	209	10,119,925	141	175,825	169	570,288	81	1,547,459
<b>Nontaxable returns, total.....</b>	<b>31,779</b>	<b>41,869,892</b>	<b>19,671</b>	<b>3,703,638</b>	<b>19,497</b>	<b>7,103,042</b>	<b>4,702</b>	<b>2,620,300</b>
\$600,000 under \$1,000,000.....	19,419	14,390,032	11,109	1,623,464	11,108	2,322,079	1,780	398,949
\$1,000,000 under \$2,500,000.....	9,899	14,564,258	6,837	1,385,183	6,542	2,510,264	1,981	717,452
\$2,500,000 under \$5,000,000.....	1,728	5,904,748	1,203	379,627	1,277	1,005,719	599	512,917
\$5,000,000 under \$10,000,000.....	543	3,584,281	386	170,773	419	591,344	240	476,018
\$10,000,000 under \$20,000,000.....	143	1,894,925	104	87,227	117	401,492	73	255,305
\$20,000,000 or more.....	46	1,531,649	32	57,364	35	272,144	28	259,659

Size of gross estate	Type of property--Continued							
	Other stock		State and local bonds		Federal savings bonds		Other Federal bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>All returns, total.....</b>	<b>45,810</b>	<b>22,295,868</b>	<b>32,220</b>	<b>11,908,260</b>	<b>8,694</b>	<b>452,678</b>	<b>18,715</b>	<b>4,263,348</b>
\$600,000 under \$1,000,000.....	23,110	3,978,617	14,966	2,256,899	4,767	202,908	9,208	973,102
\$1,000,000 under \$2,500,000.....	17,009	6,374,175	12,627	3,716,098	3,209	186,708	7,038	1,243,798
\$2,500,000 under \$5,000,000.....	3,663	3,528,818	2,982	2,162,903	486	41,871	1,446	503,331
\$5,000,000 under \$10,000,000.....	1,300	2,547,602	1,050	1,404,427	159	17,622	617	467,970
\$10,000,000 under \$20,000,000.....	487	2,170,215	398	968,784	49	2,402	269	374,562
\$20,000,000 or more.....	241	3,696,441	197	1,399,149	24	1,166	138	700,587
<b>Taxable returns, total.....</b>	<b>22,258</b>	<b>15,420,687</b>	<b>16,229</b>	<b>7,788,406</b>	<b>4,142</b>	<b>258,464</b>	<b>9,549</b>	<b>2,837,795</b>
\$600,000 under \$1,000,000.....	9,236	1,963,232	5,886	1,005,286	1,776	76,166	3,607	411,297
\$1,000,000 under \$2,500,000.....	9,404	4,052,205	7,287	2,274,351	1,876	132,344	4,287	804,620
\$2,500,000 under \$5,000,000.....	2,222	2,424,125	1,885	1,455,416	318	33,347	908	334,487
\$5,000,000 under \$10,000,000.....	838	1,792,294	698	1,062,016	111	13,486	409	347,267
\$10,000,000 under \$20,000,000.....	358	1,810,885	307	775,879	**60	**3,121	216	314,802
\$20,000,000 or more.....	200	3,377,945	167	1,215,458	**	**	121	625,322
<b>Nontaxable returns, total.....</b>	<b>23,552</b>	<b>6,875,181</b>	<b>15,991</b>	<b>4,119,854</b>	<b>4,552</b>	<b>194,213</b>	<b>9,167</b>	<b>1,425,553</b>
\$600,000 under \$1,000,000.....	13,874	2,015,385	9,080	1,251,613	2,991	126,742	5,601	561,804
\$1,000,000 under \$2,500,000.....	7,605	2,321,969	5,340	1,441,748	1,333	54,365	2,750	439,177
\$2,500,000 under \$5,000,000.....	1,441	1,104,693	1,098	707,487	168	8,524	538	168,844
\$5,000,000 under \$10,000,000.....	462	755,308	352	342,411	47	4,136	208	120,703
\$10,000,000 under \$20,000,000.....	129	359,329	91	192,905	**13	**447	52	59,759
\$20,000,000 or more.....	41	318,496	30	183,690	**	**	17	75,265

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1a.--Estate Tax Returns Filed in 1992: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds		Cash	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
<b>All returns, total.....</b>	<b>15,560</b>	<b>890,185</b>	<b>2,265</b>	<b>157,526</b>	<b>11,102</b>	<b>987,739</b>	<b>58,376</b>	<b>12,770,991</b>
\$600,000 under \$1,000,000.....	7,870	318,048	1,113	51,356	5,528	333,379	30,950	5,131,140
\$1,000,000 under \$2,500,000.....	5,544	214,701	861	71,536	4,349	333,513	20,928	4,226,829
\$2,500,000 under \$5,000,000.....	1,366	97,075	196	17,556	761	114,892	4,251	1,485,289
\$5,000,000 under \$10,000,000.....	485	109,183	65	4,919	316	94,942	1,466	834,969
\$10,000,000 under \$20,000,000.....	194	53,930	21	4,832	103	58,182	527	536,439
\$20,000,000 or more.....	102	97,248	8	7,326	45	52,831	254	556,305
<b>Taxable returns, total.....</b>	<b>8,298</b>	<b>537,413</b>	<b>1,149</b>	<b>110,235</b>	<b>5,044</b>	<b>584,321</b>	<b>27,154</b>	<b>7,708,019</b>
\$600,000 under \$1,000,000.....	3,640	137,760	471	22,904	1,919	150,787	11,815	2,441,496
\$1,000,000 under \$2,500,000.....	3,303	141,149	501	63,186	2,393	193,188	11,265	2,723,820
\$2,500,000 under \$5,000,000.....	823	58,947	116	10,727	412	71,577	2,554	1,001,214
\$5,000,000 under \$10,000,000.....	303	78,749	39	4,231	202	69,556	927	621,969
\$10,000,000 under \$20,000,000.....	149	42,971	**22	**9,187	80	47,749	385	413,991
\$20,000,000 or more.....	79	77,836	**	**	38	51,465	208	505,529
<b>Nontaxable returns, total.....</b>	<b>7,263</b>	<b>352,772</b>	<b>1,115</b>	<b>47,291</b>	<b>6,058</b>	<b>403,419</b>	<b>31,222</b>	<b>5,062,972</b>
\$600,000 under \$1,000,000.....	4,229	180,288	642	28,452	3,609	182,593	19,135	2,689,643
\$1,000,000 under \$2,500,000.....	2,241	73,552	360	8,350	1,956	140,326	9,663	1,503,009
\$2,500,000 under \$5,000,000.....	543	38,128	80	6,829	349	43,315	1,697	484,075
\$5,000,000 under \$10,000,000.....	182	30,434	27	688	114	25,385	539	213,020
\$10,000,000 under \$20,000,000.....	45	10,959	**7	**2,973	22	10,434	142	122,448
\$20,000,000 or more.....	22	19,412	**	**	7	1,366	46	50,776

Size of gross estate	Type of property--Continued							
	Insurance, face value		Insurance, policy loans		Farm assets		Limited partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
<b>All returns, total.....</b>	<b>32,731</b>	<b>3,581,549</b>	<b>4,686</b>	<b>113,207</b>	<b>3,949</b>	<b>382,236</b>	<b>7,503</b>	<b>954,683</b>
\$600,000 under \$1,000,000.....	16,900	1,181,979	2,174	39,680	2,182	97,397	2,625	96,496
\$1,000,000 under \$2,500,000.....	12,158	1,486,760	1,826	40,615	1,354	138,930	3,151	180,414
\$2,500,000 under \$5,000,000.....	2,371	507,952	433	13,363	254	61,791	942	114,030
\$5,000,000 under \$10,000,000.....	870	251,645	174	9,273	91	63,140	482	192,527
\$10,000,000 under \$20,000,000.....	290	101,146	53	5,626	42	5,049	201	152,264
\$20,000,000 or more.....	142	52,068	26	4,651	26	15,929	103	218,951
<b>Taxable returns, total.....</b>	<b>12,629</b>	<b>1,005,562</b>	<b>1,231</b>	<b>38,809</b>	<b>1,826</b>	<b>154,503</b>	<b>3,213</b>	<b>529,152</b>
\$600,000 under \$1,000,000.....	5,335	227,036	333	5,683	853	26,843	832	47,959
\$1,000,000 under \$2,500,000.....	5,333	392,089	578	13,933	700	47,638	1,431	68,994
\$2,500,000 under \$5,000,000.....	1,179	180,919	178	6,374	160	29,062	468	48,905
\$5,000,000 under \$10,000,000.....	472	115,304	93	4,694	61	31,957	266	87,537
\$10,000,000 under \$20,000,000.....	192	43,083	32	3,842	29	3,703	137	103,576
\$20,000,000 or more.....	118	47,131	18	4,283	23	15,299	79	172,180
<b>Nontaxable returns, total.....</b>	<b>20,102</b>	<b>2,575,988</b>	<b>3,455</b>	<b>74,398</b>	<b>2,123</b>	<b>227,733</b>	<b>4,290</b>	<b>425,531</b>
\$600,000 under \$1,000,000.....	11,565	954,943	1,841	33,997	1,329	70,554	1,793	48,536
\$1,000,000 under \$2,500,000.....	6,824	1,094,671	1,249	26,682	654	91,291	1,720	111,419
\$2,500,000 under \$5,000,000.....	1,193	327,033	255	6,989	93	32,730	475	65,125
\$5,000,000 under \$10,000,000.....	398	136,341	81	4,579	30	31,182	216	104,991
\$10,000,000 under \$20,000,000.....	98	58,063	21	1,784	13	1,345	64	48,688
\$20,000,000 or more.....	24	4,937	8	367	3	630	23	46,772

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1a.--Estate Tax Returns Filed in 1992: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Other noncorporate businesses		Mortgages and notes		Annuities		Depletables/intangibles	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
<b>All returns, total.....</b>	<b>9,720</b>	<b>2,324,102</b>	<b>17,607</b>	<b>2,613,526</b>	<b>22,738</b>	<b>4,095,263</b>	<b>4,433</b>	<b>395,465</b>
\$600,000 under \$1,000,000.....	3,373	229,222	7,992	642,182	11,464	1,262,077	1,924	74,971
\$1,000,000 under \$2,500,000.....	4,211	629,843	6,641	820,268	8,715	1,730,715	1,582	124,668
\$2,500,000 under \$5,000,000.....	1,227	324,976	1,809	430,113	1,708	640,522	539	67,751
\$5,000,000 under \$10,000,000.....	550	411,701	711	260,001	571	242,318	254	53,972
\$10,000,000 under \$20,000,000.....	242	290,726	286	171,144	190	139,293	79	46,225
\$20,000,000 or more.....	117	437,634	167	289,818	89	80,338	55	27,878
<b>Taxable returns, total.....</b>	<b>3,829</b>	<b>1,045,502</b>	<b>8,384</b>	<b>1,421,705</b>	<b>7,735</b>	<b>1,279,009</b>	<b>2,343</b>	<b>226,343</b>
\$600,000 under \$1,000,000.....	1,076	31,720	3,054	264,913	3,229	327,631	837	32,787
\$1,000,000 under \$2,500,000.....	1,563	169,213	3,500	392,937	3,292	457,052	877	49,804
\$2,500,000 under \$5,000,000.....	625	135,798	1,048	240,352	720	229,392	343	39,978
\$5,000,000 under \$10,000,000.....	301	190,640	431	147,376	303	117,209	176	39,318
\$10,000,000 under \$20,000,000.....	167	190,447	214	116,126	121	77,905	59	36,763
\$20,000,000 or more.....	98	327,684	137	260,001	70	69,820	51	27,694
<b>Nontaxable returns, total.....</b>	<b>5,891</b>	<b>1,278,599</b>	<b>9,223</b>	<b>1,191,820</b>	<b>15,003</b>	<b>2,816,254</b>	<b>2,090</b>	<b>169,122</b>
\$600,000 under \$1,000,000.....	2,297	197,501	4,939	377,269	8,235	934,446	1,087	42,184
\$1,000,000 under \$2,500,000.....	2,649	460,631	3,141	427,331	5,423	1,273,663	705	74,864
\$2,500,000 under \$5,000,000.....	602	189,178	762	189,761	988	411,130	197	27,773
\$5,000,000 under \$10,000,000.....	249	221,061	280	112,625	268	125,109	78	14,654
\$10,000,000 under \$20,000,000.....	75	100,279	72	55,019	69	61,387	20	9,461
\$20,000,000 or more.....	19	109,949	30	29,817	19	10,518	4	185

Size of gross estate	Type of property--Continued				Type of deductions			
	Art		Other assets		Funeral expenses		Executors' commissions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
<b>All returns, total.....</b>	<b>1,514</b>	<b>886,562</b>	<b>53,139</b>	<b>3,100,918</b>	<b>54,105</b>	<b>315,181</b>	<b>21,246</b>	<b>876,110</b>
\$600,000 under \$1,000,000.....	442	39,813	27,323	579,794	28,483	147,052	9,812	185,913
\$1,000,000 under \$2,500,000.....	568	47,989	19,556	952,296	19,479	116,624	8,180	277,597
\$2,500,000 under \$5,000,000.....	296	49,457	4,072	477,073	4,016	28,765	2,065	142,200
\$5,000,000 under \$10,000,000.....	92	29,347	1,421	357,103	1,379	12,740	741	96,536
\$10,000,000 under \$20,000,000.....	59	77,265	518	237,529	505	5,281	293	77,265
\$20,000,000 or more.....	56	642,692	248	497,123	242	4,718	155	96,600
<b>Taxable returns, total.....</b>	<b>794</b>	<b>791,116</b>	<b>24,685</b>	<b>1,845,341</b>	<b>26,385</b>	<b>151,642</b>	<b>16,568</b>	<b>744,748</b>
\$600,000 under \$1,000,000.....	138	22,143	10,150	179,874	11,475	58,188	6,405	123,289
\$1,000,000 under \$2,500,000.....	321	15,403	10,589	523,200	10,943	61,273	7,279	254,427
\$2,500,000 under \$5,000,000.....	179	21,085	2,457	296,595	2,491	16,852	1,835	126,112
\$5,000,000 under \$10,000,000.....	59	22,138	904	251,635	896	7,832	642	82,505
\$10,000,000 under \$20,000,000.....	49	71,306	380	182,050	380	3,901	271	70,404
\$20,000,000 or more.....	48	639,042	205	411,987	201	3,597	137	88,012
<b>Nontaxable returns, total.....</b>	<b>720</b>	<b>95,446</b>	<b>28,454</b>	<b>1,255,577</b>	<b>27,720</b>	<b>163,538</b>	<b>4,678</b>	<b>131,362</b>
\$600,000 under \$1,000,000.....	304	17,670	17,174	399,920	17,009	88,865	3,406	62,624
\$1,000,000 under \$2,500,000.....	247	32,586	8,967	429,096	8,537	55,352	901	23,169
\$2,500,000 under \$5,000,000.....	118	28,372	1,616	180,478	1,526	11,913	231	16,088
\$5,000,000 under \$10,000,000.....	33	7,209	517	105,468	483	4,908	100	14,031
\$10,000,000 under \$20,000,000.....	10	5,959	138	55,479	125	1,380	22	6,862
\$20,000,000 or more.....	8	3,650	43	85,137	41	1,121	18	8,588

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1a.--Estate Tax Returns Filed in 1992: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of deductions--Continued							
	Attorneys' fees		Other expenses/losses		Debts and mortgages		Bequests to surviving spouse	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns, total.....	36,396	813,368	43,095	748,428	46,603	4,379,207	26,583	29,125,727
\$600,000 under \$1,000,000.....	18,770	222,572	22,566	140,155	23,452	696,330	12,897	4,658,307
\$1,000,000 under \$2,500,000.....	13,187	279,286	15,455	243,271	17,304	1,579,603	10,145	8,919,231
\$2,500,000 under \$5,000,000.....	2,840	125,584	3,275	109,216	3,810	694,492	2,255	5,230,936
\$5,000,000 under \$10,000,000.....	1,006	70,131	1,125	77,529	1,300	549,041	837	3,923,886
\$10,000,000 under \$20,000,000.....	391	53,957	445	69,165	495	393,532	304	2,700,613
\$20,000,000 or more.....	202	61,837	228	109,091	243	466,206	144	3,692,755
Taxable returns, total.....	23,857	633,978	26,556	618,516	24,169	1,908,283	3,516	6,727,801
\$600,000 under \$1,000,000.....	10,266	133,598	11,576	81,331	10,031	148,626	781	67,033
\$1,000,000 under \$2,500,000.....	9,976	230,152	11,059	207,708	10,198	541,098	1,409	623,839
\$2,500,000 under \$5,000,000.....	2,297	107,764	2,483	95,452	2,469	348,911	691	1,003,966
\$5,000,000 under \$10,000,000.....	807	59,602	872	70,062	888	273,732	353	1,210,507
\$10,000,000 under \$20,000,000.....	334	47,346	369	64,270	379	216,863	183	1,311,195
\$20,000,000 or more.....	177	55,515	197	99,692	204	379,054	101	2,511,260
Nontaxable returns, total.....	12,538	179,389	16,538	129,912	22,435	2,470,924	23,067	22,397,927
\$600,000 under \$1,000,000.....	8,504	88,974	10,990	58,824	13,421	547,705	12,117	4,591,275
\$1,000,000 under \$2,500,000.....	3,211	49,134	4,396	35,563	7,106	1,038,506	8,737	8,295,392
\$2,500,000 under \$5,000,000.....	543	17,820	792	13,764	1,340	345,580	1,565	4,226,969
\$5,000,000 under \$10,000,000.....	198	10,529	253	7,467	412	275,309	484	2,713,378
\$10,000,000 under \$20,000,000.....	57	6,610	76	4,895	116	176,670	122	1,389,417
\$20,000,000 or more.....	25	6,322	31	9,399	39	87,154	43	1,181,495

Size of gross estate	Type of deductions--Continued				Taxable estate		Adjusted taxable gifts	
	Charitable deduction		Total allowable deductions					
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(57)	(58)	(59)	(60)	(61)	(62)	(63)	(64)
All returns, total.....	11,052	6,785,352	59,091	43,035,775	54,973	56,159,899	6,352	1,843,767
\$600,000 under \$1,000,000.....	5,129	793,038	31,306	6,842,275	28,872	17,304,951	1,899	210,809
\$1,000,000 under \$2,500,000.....	4,122	1,424,941	21,215	12,837,260	19,812	18,643,419	2,455	453,757
\$2,500,000 under \$5,000,000.....	1,009	750,834	4,310	7,078,817	4,106	7,655,071	963	289,660
\$5,000,000 under \$10,000,000.....	440	610,071	1,474	5,339,934	1,421	4,544,901	585	325,490
\$10,000,000 under \$20,000,000.....	220	767,519	531	4,067,332	513	3,226,344	280	189,022
\$20,000,000 or more.....	132	2,438,948	255	6,870,157	249	4,785,212	169	375,030
Taxable returns, total.....	5,961	3,545,325	27,326	14,328,984	27,397	42,651,582	4,494	1,603,060
\$600,000 under \$1,000,000.....	1,926	37,022	11,901	649,085	11,955	9,077,881	1,194	173,787
\$1,000,000 under \$2,500,000.....	2,684	251,091	11,316	2,169,589	11,333	14,498,034	1,735	366,041
\$2,500,000 under \$5,000,000.....	697	253,433	2,582	1,951,183	2,582	6,852,311	724	242,861
\$5,000,000 under \$10,000,000.....	339	272,988	930	1,977,228	930	4,288,758	464	301,932
\$10,000,000 under \$20,000,000.....	193	513,501	388	2,227,480	388	3,169,093	228	175,895
\$20,000,000 or more.....	122	2,217,289	209	5,354,419	209	4,765,506	149	342,544
Nontaxable returns, total.....	5,092	3,240,027	31,765	28,706,792	27,576	13,508,316	1,857	240,707
\$600,000 under \$1,000,000.....	3,203	756,017	19,405	6,193,190	16,917	8,227,070	705	37,021
\$1,000,000 under \$2,500,000.....	1,438	1,173,850	9,899	10,667,671	8,479	4,145,385	721	87,716
\$2,500,000 under \$5,000,000.....	312	497,400	1,728	5,127,635	1,524	802,760	239	46,799
\$5,000,000 under \$10,000,000.....	101	337,083	543	3,362,706	491	256,143	121	23,558
\$10,000,000 under \$20,000,000.....	27	254,018	143	1,839,852	125	57,251	51	13,127
\$20,000,000 or more.....	10	221,659	46	1,515,738	40	19,707	20	32,486

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1a.--Estate Tax Returns Filed in 1992: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Adjusted taxable estate		Tentative estate tax		Gift tax		Estate tax before credits	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(65)	(66)	(67)	(68)	(69)	(70)	(71)	(72)
<b>All returns, total.....</b>	<b>55,060</b>	<b>58,003,662</b>	<b>55,060</b>	<b>22,718,253</b>	<b>1,112</b>	<b>356,347</b>	<b>54,975</b>	<b>22,361,901</b>
\$600,000 under \$1,000,000.....	28,890	17,515,757	28,890	5,705,265	242	14,864	28,843	5,690,399
\$1,000,000 under \$2,500,000.....	19,830	19,097,175	19,830	6,797,054	305	31,608	19,804	6,765,444
\$2,500,000 under \$5,000,000.....	4,133	7,944,731	4,133	3,328,717	175	15,471	4,121	3,313,246
\$5,000,000 under \$10,000,000.....	1,432	4,870,391	1,432	2,301,665	175	69,834	1,432	2,231,831
\$10,000,000 under \$20,000,000.....	522	3,415,366	522	1,760,199	111	50,794	522	1,709,404
\$20,000,000 or more.....	252	5,160,242	252	2,825,353	105	173,775	252	2,651,578
<b>Taxable returns, total.....</b>	<b>27,397</b>	<b>44,254,640</b>	<b>27,397</b>	<b>18,344,790</b>	<b>920</b>	<b>327,019</b>	<b>27,397</b>	<b>18,017,769</b>
\$600,000 under \$1,000,000.....	11,955	9,251,667	11,955	3,088,389	194	10,204	11,955	3,078,183
\$1,000,000 under \$2,500,000.....	11,333	14,864,074	11,333	5,450,256	220	25,528	11,333	5,424,727
\$2,500,000 under \$5,000,000.....	2,582	7,095,172	2,582	3,054,254	140	13,068	2,582	3,041,186
\$5,000,000 under \$10,000,000.....	930	4,590,690	930	2,212,136	162	69,267	930	2,142,868
\$10,000,000 under \$20,000,000.....	388	3,344,988	388	1,737,757	103	50,307	388	1,687,450
\$20,000,000 or more.....	209	5,108,049	209	2,801,998	101	158,643	209	2,643,355
<b>Nontaxable returns, total.....</b>	<b>27,662</b>	<b>13,749,022</b>	<b>27,662</b>	<b>4,373,463</b>	<b>192</b>	<b>29,329</b>	<b>27,578</b>	<b>4,344,132</b>
\$600,000 under \$1,000,000.....	16,935	8,264,090	16,935	2,616,877	48	4,660	16,888	2,612,215
\$1,000,000 under \$2,500,000.....	8,497	4,233,101	8,497	1,346,797	84	6,080	8,471	1,340,717
\$2,500,000 under \$5,000,000.....	1,551	849,558	1,551	274,463	36	2,403	1,539	272,060
\$5,000,000 under \$10,000,000.....	502	279,701	502	89,530	12	567	502	88,963
\$10,000,000 under \$20,000,000.....	134	70,378	134	22,442	8	488	134	21,954
\$20,000,000 or more.....	43	52,193	43	23,354	4	15,132	43	8,223

Size of gross estate	Allowable unified credit		State death tax credit		Other tax credits		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(73)	(74)	(75)	(76)	(77)	(78)	(79)	(80)
<b>All returns, total.....</b>	<b>57,778</b>	<b>11,093,231</b>	<b>31,802</b>	<b>2,609,726</b>	<b>1,078</b>	<b>106,950</b>	<b>27,397</b>	<b>10,108,873</b>
\$600,000 under \$1,000,000.....	30,619	5,882,472	15,165	272,019	399	6,891	11,955	531,485
\$1,000,000 under \$2,500,000.....	20,683	3,966,745	12,194	586,466	469	41,204	11,333	2,647,563
\$2,500,000 under \$5,000,000.....	4,230	811,743	2,827	412,329	131	23,844	2,582	2,122,082
\$5,000,000 under \$10,000,000.....	1,463	281,655	1,006	344,752	47	25,088	930	1,594,900
\$10,000,000 under \$20,000,000.....	528	101,491	397	338,147	23	7,117	388	1,267,628
\$20,000,000 or more.....	255	49,124	212	656,013	9	2,805	209	1,945,216
<b>Taxable returns, total.....</b>	<b>27,389</b>	<b>5,270,917</b>	<b>26,535</b>	<b>2,555,617</b>	<b>904</b>	<b>82,355</b>	<b>27,397</b>	<b>10,108,873</b>
\$600,000 under \$1,000,000.....	11,955	2,304,393	11,437	239,229	282	3,074	11,955	531,485
\$1,000,000 under \$2,500,000.....	11,331	2,176,103	11,045	571,625	422	29,433	11,333	2,647,563
\$2,500,000 under \$5,000,000.....	2,576	496,232	2,547	407,304	124	15,568	2,582	2,122,082
\$5,000,000 under \$10,000,000.....	930	179,197	920	343,695	**	**	930	1,594,900
\$10,000,000 under \$20,000,000.....	388	74,763	380	337,942	**76	**34,280	388	1,267,628
\$20,000,000 or more.....	209	40,228	206	655,823	**	**	209	1,945,216
<b>Nontaxable returns, total.....</b>	<b>30,388</b>	<b>5,822,314</b>	<b>5,267</b>	<b>54,109</b>	<b>174</b>	<b>24,595</b>	<b>--</b>	<b>--</b>
\$600,000 under \$1,000,000.....	18,664	3,578,079	3,728	32,791	117	3,817	--	--
\$1,000,000 under \$2,500,000.....	9,352	1,790,642	1,149	14,841	47	11,771	--	--
\$2,500,000 under \$5,000,000.....	1,653	315,511	280	5,025	7	8,277	--	--
\$5,000,000 under \$10,000,000.....	532	102,458	87	1,058	**	**	--	--
\$10,000,000 under \$20,000,000.....	140	26,728	17	205	**3	**730	--	--
\$20,000,000 or more.....	46	8,896	6	189	**	**	--	--

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1a.--Estate Tax Returns Filed in 1992: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Generation-skipping tax		Community property		Full value, property held with spouse		Total lifetime transfers	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(81)	(82)	(83)	(84)	(85)	(86)	(87)	(88)
<b>All returns, total.....</b>	<b>154</b>	<b>51,272</b>	<b>6,696</b>	<b>17,795,116</b>	<b>21,130</b>	<b>10,364,078</b>	<b>15,353</b>	<b>19,789,981</b>
\$600,000 under \$1,000,000.....	6	65	3,388	4,429,337	10,229	3,353,486	6,686	3,254,386
\$1,000,000 under \$2,500,000.....	28	2,320	2,474	5,878,176	8,247	4,184,621	6,030	5,618,853
\$2,500,000 under \$5,000,000.....	44	9,611	538	3,083,712	1,717	1,463,768	1,550	3,092,880
\$5,000,000 under \$10,000,000.....	14	7,434	198	2,040,935	627	731,689	659	2,586,976
\$10,000,000 under \$20,000,000.....	31	19,006	69	1,214,753	218	321,868	268	1,957,910
\$20,000,000 or more.....	29	12,827	29	1,148,204	92	308,646	161	3,278,976
<b>Taxable returns, total.....</b>	<b>153</b>	<b>51,263</b>	<b>701</b>	<b>2,987,455</b>	<b>2,719</b>	<b>1,358,172</b>	<b>7,445</b>	<b>12,497,797</b>
\$600,000 under \$1,000,000.....	6	65	215	273,268	563	99,696	2,292	1,149,992
\$1,000,000 under \$2,500,000.....	28	2,320	255	522,249	1,155	332,357	3,390	3,313,351
\$2,500,000 under \$5,000,000.....	44	9,611	120	560,740	532	286,555	986	2,064,434
\$5,000,000 under \$10,000,000.....	14	7,434	61	587,410	269	275,509	430	1,608,988
\$10,000,000 under \$20,000,000.....	31	19,006	33	425,370	130	144,630	209	1,555,935
\$20,000,000 or more.....	29	12,827	18	618,418	71	219,425	138	2,805,098
<b>Nontaxable returns, total.....</b>	<b>--</b>	<b>--</b>	<b>5,996</b>	<b>14,807,662</b>	<b>18,410</b>	<b>9,005,906</b>	<b>7,908</b>	<b>7,292,184</b>
\$600,000 under \$1,000,000.....	--	--	3,173	4,156,069	9,666	3,253,789	4,394	2,104,394
\$1,000,000 under \$2,500,000.....	--	--	2,219	5,355,927	7,093	3,852,264	2,640	2,305,502
\$2,500,000 under \$5,000,000.....	--	--	418	2,522,972	1,185	1,177,213	564	1,028,446
\$5,000,000 under \$10,000,000.....	--	--	137	1,453,525	358	456,180	229	977,988
\$10,000,000 under \$20,000,000.....	--	--	36	789,383	88	177,238	58	401,975
\$20,000,000 or more.....	--	--	11	529,786	21	89,221	23	473,878

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

\*\*Data deleted or combined to prevent disclosure of individual taxpayer data.

Note: Detail may not add to totals because of rounding.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1b.--Estate Tax Returns Filed in 1993: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Gross estate, tax purposes <sup>1</sup>		Type of property					
			Personal residence		Other real estate		Closely held stock	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All returns, total.....</b>	<b>60,207</b>	<b>103,692,092</b>	<b>36,625</b>	<b>7,615,373</b>	<b>33,923</b>	<b>13,851,168</b>	<b>7,643</b>	<b>8,233,887</b>
\$600,000 under \$1,000,000.....	31,952	24,526,565	18,698	2,963,679	16,235	3,451,433	2,306	441,707
\$1,000,000 under \$2,500,000.....	21,551	31,541,199	13,458	2,741,425	13,037	4,975,066	3,372	1,181,897
\$2,500,000 under \$5,000,000.....	4,390	14,964,205	2,886	944,326	2,957	2,207,866	1,132	870,858
\$5,000,000 under \$10,000,000.....	1,551	10,528,123	1,043	491,068	1,102	1,368,413	494	857,746
\$10,000,000 under \$20,000,000.....	507	6,905,917	348	243,177	387	846,996	204	778,030
\$20,000,000 or more.....	257	15,226,084	191	231,698	204	1,001,394	135	4,103,649
<b>Taxable returns, total.....</b>	<b>27,506</b>	<b>59,157,067</b>	<b>14,846</b>	<b>3,615,019</b>	<b>14,353</b>	<b>6,471,619</b>	<b>2,595</b>	<b>4,027,380</b>
\$600,000 under \$1,000,000.....	12,054	9,777,059	6,063	1,064,591	5,467	1,191,184	423	113,170
\$1,000,000 under \$2,500,000.....	11,222	16,601,770	6,036	1,302,941	6,109	2,192,811	1,177	409,434
\$2,500,000 under \$5,000,000.....	2,646	9,039,684	1,688	574,917	1,678	1,139,780	496	346,030
\$5,000,000 under \$10,000,000.....	1,014	6,950,667	656	309,067	670	721,502	264	416,712
\$10,000,000 under \$20,000,000.....	364	5,035,016	248	164,265	266	478,175	135	547,755
\$20,000,000 or more.....	205	11,752,871	155	199,237	164	748,166	101	2,194,279
<b>Nontaxable returns, total.....</b>	<b>32,701</b>	<b>44,535,025</b>	<b>21,779</b>	<b>4,000,354</b>	<b>19,570</b>	<b>7,379,549</b>	<b>5,048</b>	<b>4,206,507</b>
\$600,000 under \$1,000,000.....	19,897	14,749,506	12,635	1,899,088	10,769	2,260,248	1,883	328,538
\$1,000,000 under \$2,500,000.....	10,329	14,939,428	7,423	1,438,484	6,928	2,782,255	2,195	772,463
\$2,500,000 under \$5,000,000.....	1,744	5,924,521	1,199	369,409	1,280	1,068,086	637	524,827
\$5,000,000 under \$10,000,000.....	537	3,577,456	387	182,001	433	646,910	230	441,034
\$10,000,000 under \$20,000,000.....	143	1,870,901	100	78,912	121	368,821	69	230,275
\$20,000,000 or more.....	52	3,473,213	36	32,461	40	253,228	34	1,909,370

Size of gross estate	Type of property--Continued							
	Other stock		State and local bonds		Federal savings bonds		Other Federal bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>All returns, total.....</b>	<b>46,557</b>	<b>24,358,469</b>	<b>33,101</b>	<b>12,886,992</b>	<b>9,285</b>	<b>477,176</b>	<b>20,341</b>	<b>4,367,909</b>
\$600,000 under \$1,000,000.....	23,420	4,433,524	14,948	2,267,295	5,408	238,742	10,198	981,637
\$1,000,000 under \$2,500,000.....	17,235	6,346,684	13,282	4,121,375	3,121	198,424	7,330	1,210,914
\$2,500,000 under \$5,000,000.....	3,828	3,876,321	3,143	2,353,322	534	26,188	1,754	627,427
\$5,000,000 under \$10,000,000.....	1,374	3,060,940	1,148	1,674,234	154	10,898	661	435,138
\$10,000,000 under \$20,000,000.....	460	1,993,619	389	1,006,531	50	2,147	244	304,427
\$20,000,000 or more.....	240	4,647,381	191	1,464,234	18	778	154	808,365
<b>Taxable returns, total.....</b>	<b>22,556</b>	<b>17,142,665</b>	<b>16,987</b>	<b>8,677,096</b>	<b>4,537</b>	<b>284,522</b>	<b>10,284</b>	<b>2,942,406</b>
\$600,000 under \$1,000,000.....	9,370	2,174,487	6,180	996,101	2,260	129,794	4,021	434,411
\$1,000,000 under \$2,500,000.....	9,367	4,052,259	7,490	2,524,786	1,782	127,396	4,317	749,860
\$2,500,000 under \$5,000,000.....	2,366	2,645,934	2,057	1,703,147	346	16,206	1,156	459,739
\$5,000,000 under \$10,000,000.....	922	2,364,985	808	1,258,962	101	8,821	476	342,255
\$10,000,000 under \$20,000,000.....	336	1,605,092	288	825,630	35	1,611	181	251,313
\$20,000,000 or more.....	195	4,299,908	165	1,368,470	13	695	132	704,828
<b>Nontaxable returns, total.....</b>	<b>24,002</b>	<b>7,215,804</b>	<b>16,114</b>	<b>4,209,896</b>	<b>4,747</b>	<b>192,654</b>	<b>10,058</b>	<b>1,425,503</b>
\$600,000 under \$1,000,000.....	14,050	2,259,036	8,769	1,271,194	3,147	108,948	6,177	547,226
\$1,000,000 under \$2,500,000.....	7,868	2,294,425	5,792	1,596,590	1,339	71,027	3,013	461,054
\$2,500,000 under \$5,000,000.....	1,463	1,230,388	1,086	650,174	188	9,982	597	167,688
\$5,000,000 under \$10,000,000.....	452	695,954	340	415,272	53	2,077	185	92,883
\$10,000,000 under \$20,000,000.....	124	388,527	101	180,901	15	535	63	53,114
\$20,000,000 or more.....	45	347,474	26	95,764	5	83	22	103,537

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1b.--Estate Tax Returns Filed in 1993: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds		Cash	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
<b>All returns, total.....</b>	<b>13,931</b>	<b>872,883</b>	<b>5,242</b>	<b>350,242</b>	<b>13,301</b>	<b>1,090,238</b>	<b>59,510</b>	<b>11,900,416</b>
\$600,000 under \$1,000,000.....	6,853	256,502	2,742	151,315	6,620	419,020	31,552	4,628,577
\$1,000,000 under \$2,500,000.....	5,060	234,866	1,914	125,726	5,032	327,459	21,317	4,232,501
\$2,500,000 under \$5,000,000.....	1,281	106,665	423	40,603	1,109	139,028	4,337	1,242,619
\$5,000,000 under \$10,000,000.....	478	57,713	113	15,653	367	83,029	1,541	800,580
\$10,000,000 under \$20,000,000.....	158	55,983	30	2,179	112	42,586	505	466,459
\$20,000,000 or more.....	102	161,155	21	14,766	60	79,117	257	529,681
<b>Taxable returns, total.....</b>	<b>7,016</b>	<b>564,887</b>	<b>2,744</b>	<b>221,395</b>	<b>6,366</b>	<b>635,389</b>	<b>27,381</b>	<b>7,161,741</b>
\$600,000 under \$1,000,000.....	2,720	94,202	1,197	81,493	2,702	182,909	11,987	2,098,387
\$1,000,000 under \$2,500,000.....	2,949	160,577	1,147	81,167	2,628	205,450	11,179	2,794,454
\$2,500,000 under \$5,000,000.....	826	74,153	281	29,545	660	81,082	2,633	843,346
\$5,000,000 under \$10,000,000.....	318	36,217	83	13,047	246	60,327	1,013	575,344
\$10,000,000 under \$20,000,000.....	116	42,028	20	1,761	83	30,040	364	374,468
\$20,000,000 or more.....	87	157,710	17	14,381	47	75,581	205	475,742
<b>Nontaxable returns, total.....</b>	<b>6,915</b>	<b>307,996</b>	<b>2,499</b>	<b>128,847</b>	<b>6,934</b>	<b>454,849</b>	<b>32,129</b>	<b>4,738,675</b>
\$600,000 under \$1,000,000.....	4,133	162,300	1,545	69,821	3,918	236,111	19,565	2,530,189
\$1,000,000 under \$2,500,000.....	2,110	74,289	768	44,559	2,404	122,009	10,138	1,438,047
\$2,500,000 under \$5,000,000.....	455	32,512	142	11,057	449	57,946	1,704	399,273
\$5,000,000 under \$10,000,000.....	159	21,495	30	2,606	121	22,702	528	225,236
\$10,000,000 under \$20,000,000.....	42	13,955	10	418	29	12,546	141	91,991
\$20,000,000 or more.....	15	3,445	4	385	13	3,536	52	53,939

Size of gross estate	Type of property--Continued							
	Insurance, face value		Insurance, policy loans		Farm assets		Limited partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
<b>All returns, total.....</b>	<b>32,739</b>	<b>3,626,887</b>	<b>4,780</b>	<b>111,366</b>	<b>4,090</b>	<b>370,106</b>	<b>7,426</b>	<b>895,287</b>
\$600,000 under \$1,000,000.....	16,972	1,118,732	2,145	30,849	2,347	157,490	2,778	97,245
\$1,000,000 under \$2,500,000.....	12,198	1,532,771	1,912	40,445	1,318	123,055	2,892	150,716
\$2,500,000 under \$5,000,000.....	2,347	504,504	489	20,174	264	47,754	1,058	117,289
\$5,000,000 under \$10,000,000.....	797	242,844	147	10,353	99	23,056	417	149,962
\$10,000,000 under \$20,000,000.....	279	116,083	61	6,245	39	12,073	180	79,434
\$20,000,000 or more.....	146	111,953	27	3,301	24	6,679	101	300,643
<b>Taxable returns, total.....</b>	<b>12,357</b>	<b>1,004,913</b>	<b>1,359</b>	<b>39,917</b>	<b>1,898</b>	<b>160,629</b>	<b>3,235</b>	<b>532,046</b>
\$600,000 under \$1,000,000.....	5,295	219,473	418	3,640	1,014	68,345	901	28,959
\$1,000,000 under \$2,500,000.....	5,145	394,861	600	14,811	617	35,043	1,324	54,321
\$2,500,000 under \$5,000,000.....	1,168	164,724	207	9,695	158	27,673	550	63,750
\$5,000,000 under \$10,000,000.....	446	96,085	72	7,014	62	15,430	257	63,996
\$10,000,000 under \$20,000,000.....	192	55,777	41	3,239	27	7,952	120	44,855
\$20,000,000 or more.....	111	73,994	21	1,518	20	6,186	83	276,164
<b>Nontaxable returns, total.....</b>	<b>20,382</b>	<b>2,621,974</b>	<b>3,421</b>	<b>71,450</b>	<b>2,192</b>	<b>209,478</b>	<b>4,191</b>	<b>363,241</b>
\$600,000 under \$1,000,000.....	11,677	899,259	1,727	27,208	1,333	89,145	1,877	68,286
\$1,000,000 under \$2,500,000.....	7,054	1,137,910	1,311	25,634	701	88,012	1,568	96,394
\$2,500,000 under \$5,000,000.....	1,179	339,780	281	10,478	106	20,081	508	53,539
\$5,000,000 under \$10,000,000.....	350	146,759	75	3,340	36	7,625	160	85,966
\$10,000,000 under \$20,000,000.....	87	60,306	20	3,006	12	4,121	60	34,579
\$20,000,000 or more.....	35	37,959	6	1,783	4	493	18	24,478

Footnotes at end of table.



# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1b.--Estate Tax Returns Filed in 1993: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Other noncorporate businesses		Mortgages and notes		Annuities		Depletables/intangibles	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
<b>All returns, total.....</b>	<b>8,519</b>	<b>1,755,553</b>	<b>18,337</b>	<b>2,665,907</b>	<b>24,341</b>	<b>4,541,368</b>	<b>4,583</b>	<b>691,807</b>
\$600,000 under \$1,000,000.....	2,844	135,815	8,485	671,315	12,447	1,392,777	2,032	91,780
\$1,000,000 under \$2,500,000.....	3,605	411,311	6,879	859,740	9,191	1,864,397	1,670	100,710
\$2,500,000 under \$5,000,000.....	1,231	298,041	1,796	378,311	1,775	690,637	486	56,973
\$5,000,000 under \$10,000,000.....	501	242,342	737	260,907	617	371,744	234	52,112
\$10,000,000 under \$20,000,000.....	202	231,908	278	212,492	201	147,734	100	60,198
\$20,000,000 or more.....	137	436,136	162	283,142	110	74,098	61	330,034
<b>Taxable returns, total.....</b>	<b>3,463</b>	<b>811,659</b>	<b>8,022</b>	<b>1,377,843</b>	<b>8,138</b>	<b>1,422,794</b>	<b>2,217</b>	<b>220,255</b>
\$600,000 under \$1,000,000.....	748	23,823	3,008	263,464	3,517	347,580	823	49,965
\$1,000,000 under \$2,500,000.....	1,547	132,870	3,249	420,524	3,338	525,218	797	38,717
\$2,500,000 under \$5,000,000.....	637	137,263	995	189,941	758	236,424	326	30,350
\$5,000,000 under \$10,000,000.....	293	120,112	447	144,143	319	161,024	146	30,826
\$10,000,000 under \$20,000,000.....	129	131,873	190	117,753	123	100,340	76	24,935
\$20,000,000 or more.....	109	265,717	133	242,018	84	52,209	49	45,461
<b>Nontaxable returns, total.....</b>	<b>5,057</b>	<b>943,894</b>	<b>10,315</b>	<b>1,288,064</b>	<b>16,203</b>	<b>3,118,593</b>	<b>2,366</b>	<b>471,552</b>
\$600,000 under \$1,000,000.....	2,096	111,992	5,476	407,851	8,930	1,045,198	1,209	41,815
\$1,000,000 under \$2,500,000.....	2,058	278,440	3,631	439,216	5,854	1,339,179	873	61,993
\$2,500,000 under \$5,000,000.....	594	160,777	800	188,370	1,017	454,213	160	26,622
\$5,000,000 under \$10,000,000.....	208	122,230	291	116,764	298	210,720	88	21,286
\$10,000,000 under \$20,000,000.....	73	100,035	88	94,739	78	47,395	24	35,263
\$20,000,000 or more.....	28	170,419	29	41,124	26	21,889	12	284,573

Size of gross estate	Type of property--Continued				Type of deductions			
	Art		Other assets		Funeral expenses		Executors' commissions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
<b>All returns, total.....</b>	<b>1,509</b>	<b>450,395</b>	<b>54,512</b>	<b>2,801,403</b>	<b>55,301</b>	<b>332,643</b>	<b>20,625</b>	<b>855,647</b>
\$600,000 under \$1,000,000.....	491	11,914	28,338	646,928	29,356	161,132	9,391	161,348
\$1,000,000 under \$2,500,000.....	543	31,121	19,795	811,498	19,642	121,211	8,006	260,743
\$2,500,000 under \$5,000,000.....	222	18,646	4,154	437,005	4,126	29,692	2,030	143,661
\$5,000,000 under \$10,000,000.....	125	45,927	1,483	294,172	1,455	12,194	779	102,467
\$10,000,000 under \$20,000,000.....	67	68,032	490	242,074	474	4,706	282	68,729
\$20,000,000 or more.....	61	274,756	252	369,726	247	3,709	138	118,699
<b>Taxable returns, total.....</b>	<b>746</b>	<b>275,993</b>	<b>24,777</b>	<b>1,646,741</b>	<b>26,853</b>	<b>158,026</b>	<b>15,901</b>	<b>736,510</b>
\$600,000 under \$1,000,000.....	204	2,754	10,335	215,610	11,847	62,361	6,009	104,114
\$1,000,000 under \$2,500,000.....	217	7,750	10,377	406,144	10,879	63,322	6,996	231,031
\$2,500,000 under \$5,000,000.....	139	4,883	2,534	280,494	2,590	17,729	1,817	130,017
\$5,000,000 under \$10,000,000.....	89	20,080	974	198,744	986	8,036	701	94,042
\$10,000,000 under \$20,000,000.....	47	40,121	354	192,512	353	3,453	248	63,615
\$20,000,000 or more.....	49	200,405	203	353,236	198	3,124	130	113,692
<b>Nontaxable returns, total.....</b>	<b>763</b>	<b>174,402</b>	<b>29,736</b>	<b>1,154,661</b>	<b>28,448</b>	<b>174,617</b>	<b>4,725</b>	<b>119,137</b>
\$600,000 under \$1,000,000.....	287	9,160	18,004	431,317	17,509	98,771	3,382	57,235
\$1,000,000 under \$2,500,000.....	325	23,371	9,418	405,354	8,763	57,889	1,011	29,712
\$2,500,000 under \$5,000,000.....	83	13,763	1,620	156,511	1,536	11,963	212	13,644
\$5,000,000 under \$10,000,000.....	36	25,847	509	95,428	469	4,158	77	8,426
\$10,000,000 under \$20,000,000.....	20	27,911	136	49,562	121	1,252	34	5,113
\$20,000,000 or more.....	12	74,350	49	16,490	49	585	8	5,007

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1b.--Estate Tax Returns Filed in 1993: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of deductions--Continued							
	Attorneys' fees		Other expenses/losses		Debts and mortgages		Bequests to surviving spouse	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns, total.....	37,052	779,172	44,162	748,289	47,149	4,534,097	27,501	32,798,155
\$600,000 under \$1,000,000.....	19,355	209,824	23,159	145,000	23,980	766,759	12,915	5,013,974
\$1,000,000 under \$2,500,000.....	13,184	262,451	15,746	226,391	17,218	1,364,299	11,013	9,418,233
\$2,500,000 under \$5,000,000.....	2,876	116,503	3,381	141,171	3,856	759,351	2,272	5,188,387
\$5,000,000 under \$10,000,000.....	1,069	76,061	1,230	87,362	1,380	706,729	875	4,020,087
\$10,000,000 under \$20,000,000.....	373	52,257	422	61,702	468	366,977	280	2,658,051
\$20,000,000 or more.....	196	62,076	224	86,662	246	569,981	145	6,499,424
Taxable returns, total.....	24,074	599,838	26,608	608,455	24,429	1,795,902	3,601	8,086,457
\$600,000 under \$1,000,000.....	10,651	122,105	11,607	81,485	10,310	162,875	506	54,521
\$1,000,000 under \$2,500,000.....	9,733	205,831	10,925	186,322	10,105	499,007	1,764	791,503
\$2,500,000 under \$5,000,000.....	2,324	98,891	2,567	122,614	2,507	307,810	694	1,000,145
\$5,000,000 under \$10,000,000.....	876	66,553	967	77,249	957	260,426	381	1,338,461
\$10,000,000 under \$20,000,000.....	315	47,230	350	57,267	352	207,998	155	1,202,097
\$20,000,000 or more.....	174	59,228	192	83,519	198	357,785	101	3,699,730
Nontaxable returns, total.....	12,978	179,334	17,554	139,833	22,720	2,738,195	23,901	24,711,698
\$600,000 under \$1,000,000.....	8,703	87,719	11,553	63,516	13,670	603,884	12,410	4,959,453
\$1,000,000 under \$2,500,000.....	3,451	56,620	4,821	40,069	7,113	865,292	9,249	8,626,730
\$2,500,000 under \$5,000,000.....	551	17,611	813	18,557	1,349	451,541	1,579	4,188,242
\$5,000,000 under \$10,000,000.....	192	9,508	263	10,113	424	446,303	494	2,681,626
\$10,000,000 under \$20,000,000.....	58	5,028	72	4,435	116	158,979	125	1,455,954
\$20,000,000 or more.....	22	2,848	32	3,143	48	212,196	44	2,799,693

Size of gross estate	Type of deductions--Continued				Taxable estate		Adjusted taxable gifts	
	Charitable deduction		Total allowable deductions					
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(57)	(58)	(59)	(60)	(61)	(62)	(63)	(64)
All returns, total.....	11,119	7,292,066	60,192	47,337,334	56,121	57,030,288	6,749	1,963,222
\$600,000 under \$1,000,000.....	5,091	767,971	31,936	7,225,236	29,564	17,649,143	1,852	267,905
\$1,000,000 under \$2,500,000.....	4,064	1,327,981	21,551	12,979,839	20,132	18,664,087	2,650	487,071
\$2,500,000 under \$5,000,000.....	1,164	768,638	4,390	7,146,910	4,216	7,914,827	1,154	325,499
\$5,000,000 under \$10,000,000.....	476	708,034	1,551	5,712,935	1,470	4,928,842	654	345,474
\$10,000,000 under \$20,000,000.....	184	562,382	507	3,774,805	491	3,144,093	266	262,314
\$20,000,000 or more.....	140	3,157,060	257	10,497,610	248	4,729,296	174	274,959
Taxable returns, total.....	6,121	4,106,000	27,506	16,090,880	27,500	43,067,165	4,976	1,681,331
\$600,000 under \$1,000,000.....	1,887	48,339	12,054	635,801	12,054	9,141,256	1,314	219,560
\$1,000,000 under \$2,500,000.....	2,691	308,124	11,222	2,285,139	11,222	14,316,629	1,918	399,945
\$2,500,000 under \$5,000,000.....	882	248,681	2,646	1,925,579	2,640	7,115,089	856	275,056
\$5,000,000 under \$10,000,000.....	377	407,748	1,014	2,252,515	1,014	4,698,152	520	301,135
\$10,000,000 under \$20,000,000.....	157	366,514	364	1,948,175	364	3,086,841	219	226,789
\$20,000,000 or more.....	128	2,726,595	205	7,043,672	205	4,709,199	149	258,846
Nontaxable returns, total.....	4,997	3,186,066	32,686	31,246,454	28,621	13,963,122	1,773	281,892
\$600,000 under \$1,000,000.....	3,204	719,633	19,882	6,589,435	17,510	8,507,887	538	48,345
\$1,000,000 under \$2,500,000.....	1,373	1,019,857	10,329	10,694,700	8,910	4,347,458	731	87,126
\$2,500,000 under \$5,000,000.....	282	519,957	1,744	5,221,332	1,576	799,738	298	50,444
\$5,000,000 under \$10,000,000.....	99	300,287	537	3,460,419	455	230,690	134	44,339
\$10,000,000 under \$20,000,000.....	27	195,868	143	1,826,630	127	57,252	47	35,526
\$20,000,000 or more.....	12	430,465	52	3,453,938	43	20,098	25	16,113

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1b.—Estate Tax Returns Filed in 1993: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of gross estate	Adjusted taxable estate		Tentative estate tax		Gift tax		Estate tax before credits	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(65)	(66)	(67)	(68)	(69)	(70)	(71)	(72)
<b>All returns, total.....</b>	<b>56,257</b>	<b>58,994,881</b>	<b>56,247</b>	<b>23,114,761</b>	<b>1,049</b>	<b>310,473</b>	<b>56,199</b>	<b>22,804,285</b>
\$600,000 under \$1,000,000.....	29,625	17,917,047	29,625	5,834,144	159	11,904	29,583	5,822,239
\$1,000,000 under \$2,500,000.....	20,156	19,151,156	20,151	6,808,878	299	15,621	20,147	6,793,256
\$2,500,000 under \$5,000,000.....	4,234	8,240,326	4,229	3,465,264	182	17,955	4,228	3,447,309
\$5,000,000 under \$10,000,000.....	1,490	5,274,884	1,490	2,503,552	194	69,046	1,490	2,434,506
\$10,000,000 under \$20,000,000.....	497	3,407,211	497	1,768,788	117	84,254	496	1,684,534
\$20,000,000 or more.....	255	5,004,255	255	2,734,135	98	111,693	254	2,622,442
<b>Taxable returns, total.....</b>	<b>27,506</b>	<b>44,748,495</b>	<b>27,506</b>	<b>18,590,266</b>	<b>853</b>	<b>277,870</b>	<b>27,506</b>	<b>18,312,395</b>
\$600,000 under \$1,000,000.....	12,054	9,360,816	12,054	3,127,540	78	3,395	12,054	3,124,144
\$1,000,000 under \$2,500,000.....	11,222	14,716,573	11,222	5,400,217	257	13,680	11,222	5,386,537
\$2,500,000 under \$5,000,000.....	2,646	7,390,144	2,646	3,193,546	158	16,200	2,646	3,177,346
\$5,000,000 under \$10,000,000.....	1,014	4,999,287	1,014	2,413,060	170	64,001	1,014	2,349,059
\$10,000,000 under \$20,000,000.....	364	3,313,630	364	1,734,460	104	72,858	364	1,661,602
\$20,000,000 or more.....	205	4,968,045	205	2,721,442	86	107,735	205	2,613,707
<b>Nontaxable returns, total.....</b>	<b>28,752</b>	<b>14,246,386</b>	<b>28,741</b>	<b>4,524,495</b>	<b>196</b>	<b>32,603</b>	<b>28,693</b>	<b>4,491,891</b>
\$600,000 under \$1,000,000.....	17,570	8,556,232	17,570	2,706,604	80	8,508	17,529	2,698,095
\$1,000,000 under \$2,500,000.....	8,934	4,434,583	8,929	1,408,661	43	1,941	8,926	1,406,719
\$2,500,000 under \$5,000,000.....	1,588	850,182	1,583	271,718	24	1,755	1,582	269,963
\$5,000,000 under \$10,000,000.....	476	275,598	476	90,492	24	5,045	476	85,447
\$10,000,000 under \$20,000,000.....	133	93,581	133	34,328	13	11,396	132	22,932
\$20,000,000 or more.....	50	36,211	50	12,692	12	3,958	49	8,735

Size of gross estate	Allowable unified credit		State death tax credit		Other tax credits		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(73)	(74)	(75)	(76)	(77)	(78)	(79)	(80)
<b>All returns, total.....</b>	<b>58,831</b>	<b>11,322,403</b>	<b>31,690</b>	<b>2,652,597</b>	<b>919</b>	<b>95,823</b>	<b>27,506</b>	<b>10,335,463</b>
\$600,000 under \$1,000,000.....	31,155	5,992,781	15,029	274,112	285	5,908	12,054	555,205
\$1,000,000 under \$2,500,000.....	21,034	4,051,200	12,103	578,700	439	28,521	11,222	2,637,058
\$2,500,000 under \$5,000,000.....	4,355	838,548	2,901	430,760	113	21,351	2,646	2,219,891
\$5,000,000 under \$10,000,000.....	1,523	293,171	1,066	384,671	53	21,751	1,014	1,759,384
\$10,000,000 under \$20,000,000.....	506	97,228	378	333,963	16	8,087	364	1,250,181
\$20,000,000 or more.....	257	49,474	213	650,391	13	10,204	205	1,913,743
<b>Taxable returns, total.....</b>	<b>27,486</b>	<b>5,296,910</b>	<b>26,636</b>	<b>2,601,353</b>	<b>837</b>	<b>78,662</b>	<b>27,506</b>	<b>10,335,463</b>
\$600,000 under \$1,000,000.....	12,049	2,322,737	11,524	241,734	238	4,465	12,054	555,205
\$1,000,000 under \$2,500,000.....	11,208	2,160,326	10,943	564,871	408	24,279	11,222	2,637,058
\$2,500,000 under \$5,000,000.....	2,645	509,154	2,615	426,950	113	21,351	2,646	2,219,891
\$5,000,000 under \$10,000,000.....	1,014	195,193	995	383,816	**65	**18,363	1,014	1,759,384
\$10,000,000 under \$20,000,000.....	364	70,046	357	333,678	**	**	364	1,250,181
\$20,000,000 or more.....	205	39,454	203	650,306	13	10,204	205	1,913,743
<b>Nontaxable returns, total.....</b>	<b>31,345</b>	<b>6,025,493</b>	<b>5,054</b>	<b>51,244</b>	<b>81</b>	<b>17,160</b>	<b>--</b>	<b>--</b>
\$600,000 under \$1,000,000.....	19,106	3,670,044	3,506	32,378	47	1,442	--	--
\$1,000,000 under \$2,500,000.....	9,826	1,890,874	1,161	13,830	31	4,242	--	--
\$2,500,000 under \$5,000,000.....	1,710	329,395	286	3,810	.	.	--	--
\$5,000,000 under \$10,000,000.....	509	97,977	71	855	**3	**11,475	--	--
\$10,000,000 under \$20,000,000.....	142	27,182	21	286	**	**	--	--
\$20,000,000 or more.....	52	10,020	10	86	--	--	--	--

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1b.--Estate Tax Returns Filed in 1993: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Generation-skipping tax		Community property		Full value, property held with spouse		Total lifetime transfers	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(81)	(82)	(83)	(84)	(85)	(86)	(87)	(88)
<b>All returns, total.....</b>	<b>259</b>	<b>108,225</b>	<b>7,092</b>	<b>20,288,197</b>	<b>21,237</b>	<b>10,052,175</b>	<b>17,241</b>	<b>23,198,316</b>
\$600,000 under \$1,000,000.....	28	659	3,321	4,327,563	10,166	3,112,149	7,855	3,961,891
\$1,000,000 under \$2,500,000.....	28	1,708	2,936	6,830,583	8,440	4,273,182	6,535	6,083,868
\$2,500,000 under \$5,000,000.....	93	11,787	533	2,730,695	1,690	1,412,918	1,734	3,573,141
\$5,000,000 under \$10,000,000.....	43	11,411	220	2,219,459	631	749,816	705	2,851,928
\$10,000,000 under \$20,000,000.....	34	16,133	57	1,219,052	208	279,349	258	1,811,420
\$20,000,000 or more.....	34	66,527	25	2,960,846	102	224,760	154	4,916,067
<b>Taxable returns, total.....</b>	<b>255</b>	<b>108,213</b>	<b>732</b>	<b>4,487,332</b>	<b>2,633</b>	<b>1,349,897</b>	<b>8,042</b>	<b>14,471,675</b>
\$600,000 under \$1,000,000.....	24	647	156	209,664	340	54,238	2,801	1,497,348
\$1,000,000 under \$2,500,000.....	28	1,708	348	668,374	1,355	394,039	3,339	3,355,161
\$2,500,000 under \$5,000,000.....	93	11,787	121	564,517	468	332,944	1,093	2,241,859
\$5,000,000 under \$10,000,000.....	43	11,411	68	525,672	283	266,439	481	1,947,610
\$10,000,000 under \$20,000,000.....	34	16,133	20	403,809	121	142,458	193	1,322,488
\$20,000,000 or more.....	34	66,527	19	2,115,295	65	159,779	135	4,107,208
<b>Nontaxable returns, total.....</b>	<b>4</b>	<b>12</b>	<b>6,360</b>	<b>15,800,864</b>	<b>18,604</b>	<b>8,702,278</b>	<b>9,200</b>	<b>8,726,641</b>
\$600,000 under \$1,000,000.....	4	12	3,164	4,117,898	9,826	3,057,911	5,054	2,464,543
\$1,000,000 under \$2,500,000.....	--	--	2,588	6,162,209	7,084	3,879,143	3,196	2,728,707
\$2,500,000 under \$5,000,000.....	--	--	412	2,166,177	1,222	1,079,974	641	1,331,282
\$5,000,000 under \$10,000,000.....	--	--	152	1,693,786	348	483,377	225	904,317
\$10,000,000 under \$20,000,000.....	--	--	37	815,243	87	136,891	65	488,933
\$20,000,000 or more.....	--	--	6	845,551	37	64,981	19	808,859

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

\*\*Data deleted or combined to prevent disclosure of individual taxpayer data.

Note: Detail may not add to totals because of rounding.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1c.--Estate Tax Returns Filed in 1994: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Gross estate, tax purposes <sup>1</sup>		Type of property					
			Personal residence		Other real estate		Closely held stock	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All returns, total.....</b>	<b>68,595</b>	<b>117,025,524</b>	<b>40,462</b>	<b>8,090,020</b>	<b>39,386</b>	<b>14,572,448</b>	<b>8,569</b>	<b>8,207,844</b>
\$600,000 under \$1,000,000.....	36,633	28,059,355	20,401	3,013,415	19,498	3,981,685	2,627	456,101
\$1,000,000 under \$2,500,000.....	24,401	35,894,629	15,046	3,035,775	14,548	5,086,933	3,789	1,335,031
\$2,500,000 under \$5,000,000.....	5,056	17,273,705	3,315	1,050,313	3,564	2,304,150	1,255	929,867
\$5,000,000 under \$10,000,000.....	1,656	11,317,768	1,117	564,670	1,131	1,408,515	536	943,671
\$10,000,000 under \$20,000,000.....	568	7,724,698	395	243,996	421	822,497	229	863,366
\$20,000,000 or more.....	280	16,755,369	187	181,851	224	968,669	133	3,679,808
<b>Taxable returns, total.....</b>	<b>31,918</b>	<b>69,387,319</b>	<b>17,223</b>	<b>3,934,965</b>	<b>17,263</b>	<b>6,887,824</b>	<b>3,035</b>	<b>5,111,828</b>
\$600,000 under \$1,000,000.....	13,899	11,298,278	6,932	1,071,431	6,909	1,413,314	639	104,051
\$1,000,000 under \$2,500,000.....	13,132	19,273,847	7,199	1,555,578	7,072	2,301,471	1,276	448,263
\$2,500,000 under \$5,000,000.....	3,117	10,751,859	1,911	596,397	2,075	1,247,392	556	402,780
\$5,000,000 under \$10,000,000.....	1,094	7,408,152	725	376,518	698	680,909	295	447,322
\$10,000,000 under \$20,000,000.....	446	6,108,270	300	190,383	328	525,869	165	588,769
\$20,000,000 or more.....	230	14,546,913	155	144,659	181	718,869	104	3,120,643
<b>Nontaxable returns, total.....</b>	<b>36,677</b>	<b>47,638,205</b>	<b>23,239</b>	<b>4,155,055</b>	<b>22,123</b>	<b>7,684,624</b>	<b>5,534</b>	<b>3,096,016</b>
\$600,000 under \$1,000,000.....	22,734	16,761,077	13,469	1,941,984	12,590	2,568,370	1,988	352,050
\$1,000,000 under \$2,500,000.....	11,269	16,620,782	7,847	1,480,197	7,476	2,785,462	2,513	886,768
\$2,500,000 under \$5,000,000.....	1,939	6,521,847	1,403	453,917	1,488	1,056,758	699	527,087
\$5,000,000 under \$10,000,000.....	562	3,909,616	392	188,152	433	727,605	241	496,349
\$10,000,000 under \$20,000,000.....	122	1,616,429	95	53,613	93	296,629	64	274,597
\$20,000,000 or more.....	50	2,208,455	32	37,192	43	249,800	29	559,165

Size of gross estate	Type of property--Continued							
	Other stock		State and local bonds		Federal savings bonds		Other Federal bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>All returns, total.....</b>	<b>53,518</b>	<b>28,529,071</b>	<b>39,508</b>	<b>15,712,859</b>	<b>11,730</b>	<b>610,955</b>	<b>22,574</b>	<b>4,654,869</b>
\$600,000 under \$1,000,000.....	27,077	5,061,533	18,644	3,028,120	6,620	273,212	11,180	1,100,412
\$1,000,000 under \$2,500,000.....	19,794	7,694,446	15,327	4,949,322	4,214	281,826	8,486	1,403,894
\$2,500,000 under \$5,000,000.....	4,366	4,590,011	3,591	2,778,341	662	44,816	1,810	582,184
\$5,000,000 under \$10,000,000.....	1,487	3,216,512	1,265	1,982,102	164	6,582	692	369,976
\$10,000,000 under \$20,000,000.....	527	2,555,986	456	1,250,640	50	1,933	260	341,413
\$20,000,000 or more.....	267	5,410,582	224	1,724,334	19	2,587	146	856,991
<b>Taxable returns, total.....</b>	<b>25,826</b>	<b>20,258,227</b>	<b>20,173</b>	<b>10,481,722</b>	<b>5,829</b>	<b>371,063</b>	<b>12,220</b>	<b>3,147,506</b>
\$600,000 under \$1,000,000.....	10,432	2,379,060	7,279	1,326,332	2,612	136,374	4,730	545,190
\$1,000,000 under \$2,500,000.....	10,966	4,908,004	9,063	3,156,369	2,605	193,459	5,464	945,978
\$2,500,000 under \$5,000,000.....	2,785	3,295,623	2,391	2,005,514	442	33,890	1,214	430,851
\$5,000,000 under \$10,000,000.....	1,004	2,467,851	884	1,454,279	119	5,484	472	264,713
\$10,000,000 under \$20,000,000.....	415	2,194,367	371	1,040,356	39	1,304	219	292,760
\$20,000,000 or more.....	224	5,013,321	185	1,498,872	12	552	120	668,014
<b>Nontaxable returns, total.....</b>	<b>27,692</b>	<b>8,270,844</b>	<b>19,334</b>	<b>5,231,137</b>	<b>5,901</b>	<b>239,893</b>	<b>10,355</b>	<b>1,507,363</b>
\$600,000 under \$1,000,000.....	16,645	2,682,473	11,365	1,701,788	4,008	136,838	6,450	555,222
\$1,000,000 under \$2,500,000.....	8,827	2,786,442	6,264	1,792,953	1,609	88,367	3,022	457,916
\$2,500,000 under \$5,000,000.....	1,582	1,294,388	1,200	772,828	220	10,926	596	151,333
\$5,000,000 under \$10,000,000.....	483	748,661	381	527,822	45	1,098	220	105,263
\$10,000,000 under \$20,000,000.....	112	361,619	85	210,284	11	629	41	48,653
\$20,000,000 or more.....	43	397,260	39	225,462	7	2,035	26	188,976

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1c.--Estate Tax Returns Filed in 1994: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds		Cash	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
<b>All returns, total.....</b>	<b>13,735</b>	<b>819,970</b>	<b>8,567</b>	<b>543,164</b>	<b>17,374</b>	<b>1,482,726</b>	<b>67,742</b>	<b>13,108,841</b>
\$600,000 under \$1,000,000.....	6,804	229,772	4,839	246,945	9,230	563,523	36,160	5,139,050
\$1,000,000 under \$2,500,000.....	4,993	213,896	2,942	181,839	6,133	548,815	24,077	4,474,660
\$2,500,000 under \$5,000,000.....	1,259	95,917	544	63,389	1,344	183,869	5,025	1,543,570
\$5,000,000 under \$10,000,000.....	402	75,560	153	18,008	444	77,995	1,635	760,337
\$10,000,000 under \$20,000,000.....	182	40,537	55	8,103	137	61,211	565	507,512
\$20,000,000 or more.....	94	164,288	33	24,880	86	47,313	280	683,713
<b>Taxable returns, total.....</b>	<b>7,019</b>	<b>529,137</b>	<b>4,037</b>	<b>316,723</b>	<b>7,882</b>	<b>829,175</b>	<b>31,728</b>	<b>8,112,649</b>
\$600,000 under \$1,000,000.....	2,800	115,174	1,780	110,402	3,357	238,698	13,839	2,487,888
\$1,000,000 under \$2,500,000.....	2,924	120,190	1,754	122,049	3,163	334,358	13,027	2,903,668
\$2,500,000 under \$5,000,000.....	813	56,412	324	38,604	881	116,617	3,104	1,108,954
\$5,000,000 under \$10,000,000.....	263	59,359	104	14,831	296	47,861	1,084	559,890
\$10,000,000 under \$20,000,000.....	148	27,550	49	7,152	112	54,578	445	435,654
\$20,000,000 or more.....	71	150,452	26	23,685	72	37,063	230	616,597
<b>Nontaxable returns, total.....</b>	<b>6,716</b>	<b>290,833</b>	<b>4,529</b>	<b>226,441</b>	<b>9,492</b>	<b>653,550</b>	<b>36,014</b>	<b>4,996,191</b>
\$600,000 under \$1,000,000.....	4,004	114,598	3,058	136,544	5,873	324,825	22,321	2,651,161
\$1,000,000 under \$2,500,000.....	2,070	93,706	1,188	59,790	2,969	214,457	11,051	1,570,992
\$2,500,000 under \$5,000,000.....	446	39,505	220	24,785	464	67,251	1,921	434,616
\$5,000,000 under \$10,000,000.....	139	16,200	50	3,176	147	30,133	551	200,447
\$10,000,000 under \$20,000,000.....	34	12,987	6	951	25	6,633	120	71,858
\$20,000,000 or more.....	23	13,836	7	1,195	14	10,250	50	67,117

Size of gross estate	Type of property--Continued							
	Insurance, face value		Insurance, policy loans		Farm assets		Limited partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
<b>All returns, total.....</b>	<b>36,465</b>	<b>3,868,822</b>	<b>4,773</b>	<b>102,986</b>	<b>4,618</b>	<b>936,880</b>	<b>7,287</b>	<b>1,210,610</b>
\$600,000 under \$1,000,000.....	18,998	1,138,356	2,206	26,406	2,570	158,564	2,658	57,660
\$1,000,000 under \$2,500,000.....	13,337	1,680,606	1,815	39,492	1,550	187,159	2,950	120,839
\$2,500,000 under \$5,000,000.....	2,848	646,480	504	19,279	325	80,042	975	173,209
\$5,000,000 under \$10,000,000.....	857	240,410	165	11,529	104	37,788	423	156,368
\$10,000,000 under \$20,000,000.....	284	93,626	59	3,637	42	7,278	169	98,801
\$20,000,000 or more.....	140	69,343	24	2,644	27	466,050	112	603,734
<b>Taxable returns, total.....</b>	<b>14,317</b>	<b>1,085,884</b>	<b>1,445</b>	<b>45,335</b>	<b>1,743</b>	<b>614,801</b>	<b>2,927</b>	<b>890,598</b>
\$600,000 under \$1,000,000.....	6,271	237,328	520	7,917	668	24,297	759	11,145
\$1,000,000 under \$2,500,000.....	5,723	428,983	561	17,438	743	65,275	1,179	48,750
\$2,500,000 under \$5,000,000.....	1,505	213,294	216	7,355	197	33,911	500	87,825
\$5,000,000 under \$10,000,000.....	491	98,796	88	8,605	77	21,726	257	89,197
\$10,000,000 under \$20,000,000.....	210	59,829	43	2,269	37	6,939	136	72,060
\$20,000,000 or more.....	115	47,653	16	1,752	21	462,653	94	581,622
<b>Nontaxable returns, total.....</b>	<b>22,147</b>	<b>2,782,938</b>	<b>3,328</b>	<b>57,651</b>	<b>2,875</b>	<b>322,079</b>	<b>4,360</b>	<b>320,012</b>
\$600,000 under \$1,000,000.....	12,727	901,028	1,686	18,489	1,902	134,267	1,898	46,515
\$1,000,000 under \$2,500,000.....	7,614	1,251,623	1,254	22,054	807	121,884	1,770	72,089
\$2,500,000 under \$5,000,000.....	1,342	433,186	287	11,924	128	46,131	474	85,384
\$5,000,000 under \$10,000,000.....	366	141,615	77	2,924	27	16,063	166	67,171
\$10,000,000 under \$20,000,000.....	74	33,797	16	1,368	5	338	33	26,741
\$20,000,000 or more.....	25	21,690	8	892	6	3,397	18	22,112

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1c.--Estate Tax Returns Filed in 1994: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Other noncorporate businesses		Mortgages and notes		Annuities		Depletables/intangibles	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
<b>All returns, total.....</b>	<b>8,764</b>	<b>1,742,643</b>	<b>19,586</b>	<b>3,029,492</b>	<b>28,752</b>	<b>5,771,360</b>	<b>4,917</b>	<b>512,352</b>
\$600,000 under \$1,000,000.....	3,132	181,058	8,934	757,097	14,924	1,820,251	2,229	129,832
\$1,000,000 under \$2,500,000.....	3,613	378,191	7,331	874,906	10,553	2,362,509	1,798	122,740
\$2,500,000 under \$5,000,000.....	1,219	246,194	2,061	529,559	2,294	938,160	530	49,157
\$5,000,000 under \$10,000,000.....	477	244,147	791	332,812	661	371,051	210	63,050
\$10,000,000 under \$20,000,000.....	207	167,095	298	222,731	214	154,190	99	33,644
\$20,000,000 or more.....	114	525,958	171	312,387	105	125,199	51	113,927
<b>Taxable returns, total.....</b>	<b>3,288</b>	<b>1,042,345</b>	<b>8,867</b>	<b>1,650,429</b>	<b>9,661</b>	<b>1,762,058</b>	<b>2,363</b>	<b>294,957</b>
\$600,000 under \$1,000,000.....	723	36,714	2,984	284,354	4,006	429,867	757	45,322
\$1,000,000 under \$2,500,000.....	1,382	146,139	3,811	415,174	4,021	637,057	965	50,176
\$2,500,000 under \$5,000,000.....	648	136,736	1,203	329,993	1,029	312,776	365	36,238
\$5,000,000 under \$10,000,000.....	292	130,920	499	172,396	369	171,832	147	59,903
\$10,000,000 under \$20,000,000.....	145	96,755	225	160,881	159	115,762	86	25,554
\$20,000,000 or more.....	98	495,079	145	287,630	77	94,765	42	77,763
<b>Nontaxable returns, total.....</b>	<b>5,475</b>	<b>700,298</b>	<b>10,719</b>	<b>1,379,063</b>	<b>19,091</b>	<b>4,009,302</b>	<b>2,554</b>	<b>217,395</b>
\$600,000 under \$1,000,000.....	2,409	144,343	5,950	472,743	10,919	1,390,384	1,471	84,511
\$1,000,000 under \$2,500,000.....	2,231	232,052	3,520	459,731	6,532	1,725,452	833	72,564
\$2,500,000 under \$5,000,000.....	571	109,457	857	199,566	1,266	625,384	164	12,919
\$5,000,000 under \$10,000,000.....	186	113,227	293	160,417	292	199,220	64	3,147
\$10,000,000 under \$20,000,000.....	62	70,340	72	61,850	55	38,428	13	8,090
\$20,000,000 or more.....	16	30,879	26	24,757	28	30,434	9	36,164

Size of gross estate	Type of property--Continued				Type of deductions			
	Art		Other assets		Funeral expenses		Executors' commissions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
<b>All returns, total.....</b>	<b>1,625</b>	<b>583,155</b>	<b>61,284</b>	<b>3,140,452</b>	<b>62,497</b>	<b>381,507</b>	<b>24,381</b>	<b>977,100</b>
\$600,000 under \$1,000,000.....	457	27,673	31,894	721,513	33,264	181,457	11,746	200,874
\$1,000,000 under \$2,500,000.....	627	38,528	22,164	962,214	22,115	139,371	8,966	291,939
\$2,500,000 under \$5,000,000.....	273	42,705	4,795	421,055	4,741	36,386	2,362	173,497
\$5,000,000 under \$10,000,000.....	151	83,837	1,605	375,907	1,557	14,512	820	113,552
\$10,000,000 under \$20,000,000.....	56	34,902	551	218,874	549	5,651	329	79,995
\$20,000,000 or more.....	60	355,510	275	440,890	270	4,130	158	117,243
<b>Taxable returns, total.....</b>	<b>844</b>	<b>223,087</b>	<b>28,840</b>	<b>1,887,681</b>	<b>30,817</b>	<b>182,076</b>	<b>18,433</b>	<b>842,107</b>
\$600,000 under \$1,000,000.....	182	15,748	12,169	293,507	13,532	67,545	7,167	133,995
\$1,000,000 under \$2,500,000.....	324	15,567	11,976	494,778	12,517	74,012	7,911	261,508
\$2,500,000 under \$5,000,000.....	154	23,833	2,962	251,574	3,037	22,849	2,145	159,788
\$5,000,000 under \$10,000,000.....	90	43,022	1,073	249,948	1,068	9,915	760	105,224
\$10,000,000 under \$20,000,000.....	43	17,452	433	196,564	438	4,477	305	75,563
\$20,000,000 or more.....	51	107,463	227	401,311	225	3,278	144	106,029
<b>Nontaxable returns, total.....</b>	<b>781</b>	<b>360,068</b>	<b>32,445</b>	<b>1,252,771</b>	<b>31,680</b>	<b>199,432</b>	<b>5,949</b>	<b>134,993</b>
\$600,000 under \$1,000,000.....	276	11,925	19,725	428,007	19,732	113,912	4,579	66,880
\$1,000,000 under \$2,500,000.....	304	22,961	10,189	467,436	9,598	65,360	1,056	30,431
\$2,500,000 under \$5,000,000.....	119	18,871	1,833	169,481	1,705	13,537	217	13,708
\$5,000,000 under \$10,000,000.....	61	40,814	532	125,959	489	4,597	59	8,328
\$10,000,000 under \$20,000,000.....	13	17,450	118	22,310	111	1,174	24	4,432
\$20,000,000 or more.....	9	248,047	48	39,579	45	852	14	11,214

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1c.--Estate Tax Returns Filed in 1994: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of deductions--Continued							
	Attorneys' fees		Other expenses/losses		Debts and mortgages		Bequests to surviving spouse	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns, total.....	43,236	881,031	49,227	634,755	53,707	5,226,785	29,967	33,253,041
\$600,000 under \$1,000,000.....	22,760	248,085	26,268	157,609	27,528	839,890	14,137	4,959,460
\$1,000,000 under \$2,500,000.....	15,375	311,730	17,340	189,574	19,467	1,926,514	11,827	10,302,455
\$2,500,000 under \$5,000,000.....	3,287	136,805	3,658	105,435	4,429	888,661	2,672	6,000,640
\$5,000,000 under \$10,000,000.....	1,156	75,334	1,256	70,224	1,478	568,644	886	4,316,203
\$10,000,000 under \$20,000,000.....	447	46,226	473	44,420	537	364,661	303	2,616,432
\$20,000,000 or more.....	210	62,851	233	67,493	267	638,414	143	5,057,851
Taxable returns, total.....	27,682	667,594	29,929	514,779	28,222	2,263,032	4,062	8,198,596
\$600,000 under \$1,000,000.....	11,985	139,659	13,155	95,775	11,855	172,508	771	118,500
\$1,000,000 under \$2,500,000.....	11,460	248,518	12,293	158,050	11,732	632,064	1,737	855,265
\$2,500,000 under \$5,000,000.....	2,704	116,037	2,867	95,303	2,933	411,414	894	1,317,546
\$5,000,000 under \$10,000,000.....	957	63,801	1,006	60,049	1,047	272,036	362	1,180,797
\$10,000,000 under \$20,000,000.....	389	42,555	408	42,124	431	230,832	197	1,451,414
\$20,000,000 or more.....	187	57,025	200	63,478	224	544,180	101	3,275,075
Nontaxable returns, total.....	15,554	213,436	19,298	119,976	25,485	2,963,752	25,905	25,054,445
\$600,000 under \$1,000,000.....	10,775	108,426	13,112	61,834	15,673	667,382	13,366	4,840,960
\$1,000,000 under \$2,500,000.....	3,916	63,212	5,047	31,524	7,736	1,294,450	10,090	9,447,190
\$2,500,000 under \$5,000,000.....	583	20,768	790	10,132	1,496	477,247	1,779	4,683,094
\$5,000,000 under \$10,000,000.....	198	11,533	250	10,175	431	296,609	524	3,135,406
\$10,000,000 under \$20,000,000.....	58	3,671	65	2,296	106	133,830	105	1,165,019
\$20,000,000 or more.....	23	5,826	33	4,015	43	94,234	42	1,782,776

Size of gross estate	Type of deductions--Continued				Taxable estate		Adjusted taxable gifts	
	Charitable deduction		Total allowable deductions					
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(57)	(58)	(59)	(60)	(61)	(62)	(63)	(64)
All returns, total.....	11,869	9,329,704	68,502	50,632,966	64,372	66,895,387	8,111	3,093,658
\$600,000 under \$1,000,000.....	5,537	980,573	36,546	7,564,695	34,102	20,569,267	2,334	358,989
\$1,000,000 under \$2,500,000.....	4,329	1,430,542	24,395	14,575,693	22,997	21,670,820	3,099	889,746
\$2,500,000 under \$5,000,000.....	1,116	769,268	5,056	8,095,515	4,870	9,192,615	1,412	533,645
\$5,000,000 under \$10,000,000.....	504	607,675	1,656	5,750,051	1,584	5,622,694	735	531,227
\$10,000,000 under \$20,000,000.....	245	825,166	568	3,982,550	550	3,744,569	330	269,753
\$20,000,000 or more.....	137	4,716,479	280	10,664,462	269	6,095,423	202	510,297
Taxable returns, total.....	6,515	6,046,888	31,893	18,714,895	31,918	50,672,417	5,935	2,759,903
\$600,000 under \$1,000,000.....	2,111	71,629	13,875	799,611	13,899	10,498,664	1,455	306,097
\$1,000,000 under \$2,500,000.....	2,808	294,500	13,131	2,523,916	13,132	16,749,930	2,303	778,109
\$2,500,000 under \$5,000,000.....	852	349,972	3,117	2,472,732	3,117	8,279,126	1,135	464,377
\$5,000,000 under \$10,000,000.....	414	343,013	1,094	2,034,835	1,094	5,373,317	577	466,448
\$10,000,000 under \$20,000,000.....	207	568,743	446	2,415,708	446	3,692,562	287	247,638
\$20,000,000 or more.....	122	4,419,031	230	8,468,095	230	6,078,819	177	497,234
Nontaxable returns, total.....	5,354	3,282,816	36,609	31,918,071	32,453	16,222,970	2,176	333,755
\$600,000 under \$1,000,000.....	3,426	908,944	22,672	6,765,085	20,203	10,070,603	878	52,892
\$1,000,000 under \$2,500,000.....	1,521	1,136,043	11,263	12,051,777	9,865	4,920,890	796	111,637
\$2,500,000 under \$5,000,000.....	264	419,297	1,939	5,622,783	1,752	913,489	277	69,269
\$5,000,000 under \$10,000,000.....	91	264,662	562	3,715,216	490	249,377	158	64,779
\$10,000,000 under \$20,000,000.....	38	256,422	122	1,566,843	104	52,007	42	22,115
\$20,000,000 or more.....	15	297,449	50	2,196,367	39	16,604	25	13,063

Footnotes at end of table.



# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1c.—Estate Tax Returns Filed in 1994: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Adjusted taxable estate		Tentative estate tax		Gift tax		Estate tax before credits	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(65)	(66)	(67)	(68)	(69)	(70)	(71)	(72)
<b>All returns, total.....</b>	<b>64,587</b>	<b>69,989,046</b>	<b>64,551</b>	<b>27,650,447</b>	<b>1,533</b>	<b>651,023</b>	<b>64,534</b>	<b>26,999,423</b>
\$600,000 under \$1,000,000.....	34,138	20,928,256	34,137	6,822,904	228	18,209	34,120	6,804,695
\$1,000,000 under \$2,500,000.....	23,095	22,560,566	23,063	8,075,097	486	145,192	23,063	7,929,905
\$2,500,000 under \$5,000,000.....	4,905	9,726,261	4,902	4,108,375	277	60,324	4,902	4,048,051
\$5,000,000 under \$10,000,000.....	1,614	6,153,921	1,614	2,945,350	260	128,383	1,614	2,816,967
\$10,000,000 under \$20,000,000.....	560	4,014,322	560	2,079,008	148	70,747	560	2,008,261
\$20,000,000 or more.....	275	6,605,720	275	3,619,714	134	228,169	275	3,391,545
<b>Taxable returns, total.....</b>	<b>31,918</b>	<b>53,432,321</b>	<b>31,918</b>	<b>22,382,900</b>	<b>1,262</b>	<b>619,509</b>	<b>31,918</b>	<b>21,763,391</b>
\$600,000 under \$1,000,000.....	13,899	10,804,761	13,899	3,612,180	162	11,743	13,899	3,600,437
\$1,000,000 under \$2,500,000.....	13,132	17,528,039	13,132	6,473,341	367	141,847	13,132	6,331,493
\$2,500,000 under \$5,000,000.....	3,117	8,743,503	3,117	3,792,283	246	55,704	3,117	3,736,579
\$5,000,000 under \$10,000,000.....	1,094	5,839,765	1,094	2,841,550	224	118,232	1,094	2,723,318
\$10,000,000 under \$20,000,000.....	446	3,940,200	446	2,053,823	138	66,193	446	1,987,629
\$20,000,000 or more.....	230	6,576,053	230	3,609,724	124	225,790	230	3,383,934
<b>Nontaxable returns, total.....</b>	<b>32,669</b>	<b>16,556,725</b>	<b>32,633</b>	<b>5,267,547</b>	<b>272</b>	<b>31,514</b>	<b>32,616</b>	<b>5,236,032</b>
\$600,000 under \$1,000,000.....	20,239	10,123,495	20,238	3,210,724	66	6,465	20,220	3,204,258
\$1,000,000 under \$2,500,000.....	9,963	5,032,528	9,931	1,601,756	119	3,344	9,931	1,598,412
\$2,500,000 under \$5,000,000.....	1,787	982,757	1,784	316,092	31	4,620	1,784	311,471
\$5,000,000 under \$10,000,000.....	521	314,156	521	103,800	35	10,151	521	93,649
\$10,000,000 under \$20,000,000.....	114	74,121	114	25,186	10	4,554	114	20,631
\$20,000,000 or more.....	45	29,667	45	9,990	10	2,379	45	7,611

Size of gross estate	Allowable unified credit		State death tax credit		Other tax credits		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(73)	(74)	(75)	(76)	(77)	(78)	(79)	(80)
<b>All returns, total.....</b>	<b>67,613</b>	<b>13,015,880</b>	<b>37,688</b>	<b>3,204,648</b>	<b>953</b>	<b>110,205</b>	<b>31,918</b>	<b>12,391,437</b>
\$600,000 under \$1,000,000.....	36,050	6,943,077	18,210	320,062	277	4,723	13,899	650,004
\$1,000,000 under \$2,500,000.....	24,045	4,626,365	14,294	683,914	421	37,327	13,132	3,105,826
\$2,500,000 under \$5,000,000.....	5,025	966,543	3,364	501,313	142	23,071	3,117	2,623,138
\$5,000,000 under \$10,000,000.....	1,647	317,199	1,138	441,575	68	16,241	1,094	2,056,982
\$10,000,000 under \$20,000,000.....	568	109,297	453	401,431	30	5,642	446	1,495,005
\$20,000,000 or more.....	278	53,399	229	856,353	15	23,201	230	2,460,482
<b>Taxable returns, total.....</b>	<b>31,864</b>	<b>6,139,551</b>	<b>30,765</b>	<b>3,137,308</b>	<b>846</b>	<b>95,088</b>	<b>31,918</b>	<b>12,391,437</b>
\$600,000 under \$1,000,000.....	13,862	2,671,998	13,067	274,817	225	3,614	13,899	650,004
\$1,000,000 under \$2,500,000.....	13,123	2,529,414	12,887	667,037	396	29,214	13,132	3,105,826
\$2,500,000 under \$5,000,000.....	3,111	597,788	3,076	497,240	119	18,412	3,117	2,623,138
\$5,000,000 under \$10,000,000.....	1,094	210,638	1,071	440,688	**92	**20,648	1,094	2,056,982
\$10,000,000 under \$20,000,000.....	446	85,773	437	401,214	**	**	446	1,495,005
\$20,000,000 or more.....	229	43,940	226	856,312	15	23,201	230	2,460,482
<b>Nontaxable returns, total.....</b>	<b>35,749</b>	<b>6,876,329</b>	<b>6,923</b>	<b>67,340</b>	<b>107</b>	<b>15,118</b>	<b>--</b>	<b>--</b>
\$600,000 under \$1,000,000.....	22,188	4,271,078	5,143	45,245	52	1,108	--	--
\$1,000,000 under \$2,500,000.....	10,922	2,096,952	1,406	16,876	25	8,114	--	--
\$2,500,000 under \$5,000,000.....	1,914	368,754	289	4,073	23	4,659	--	--
\$5,000,000 under \$10,000,000.....	553	106,561	67	888	**6	**1,237	--	--
\$10,000,000 under \$20,000,000.....	122	23,524	16	217	**	**	--	--
\$20,000,000 or more.....	49	9,459	3	41	--	--	--	--

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1c.--Estate Tax Returns Filed in 1994: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Generation-skipping tax		Community property		Full value, property held with spouse		Total lifetime transfers	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(81)	(82)	(83)	(84)	(85)	(86)	(87)	(88)
<b>All returns, total.....</b>	<b>245</b>	<b>129,617</b>	<b>7,438</b>	<b>20,431,379</b>	<b>23,663</b>	<b>11,214,914</b>	<b>21,459</b>	<b>28,789,623</b>
\$600,000 under \$1,000,000.....	--	--	3,661	5,000,582	11,352	3,394,292	10,230	5,451,111
\$1,000,000 under \$2,500,000.....	47	2,386	2,880	7,035,515	9,359	4,613,821	7,807	7,010,789
\$2,500,000 under \$5,000,000.....	101	16,413	614	3,460,329	2,022	1,694,118	2,130	4,179,463
\$5,000,000 under \$10,000,000.....	22	6,003	193	2,181,582	628	750,466	804	3,111,575
\$10,000,000 under \$20,000,000.....	40	19,951	65	1,196,620	204	380,283	304	2,244,696
\$20,000,000 or more.....	35	84,864	26	1,556,751	97	381,934	183	6,791,989
<b>Taxable returns, total.....</b>	<b>245</b>	<b>129,617</b>	<b>791</b>	<b>3,984,508</b>	<b>3,159</b>	<b>1,729,550</b>	<b>10,591</b>	<b>19,266,242</b>
\$600,000 under \$1,000,000.....	--	--	205	216,147	706	81,772	4,094	2,385,160
\$1,000,000 under \$2,500,000.....	47	2,386	315	608,978	1,358	636,812	4,154	3,899,772
\$2,500,000 under \$5,000,000.....	101	16,413	152	768,228	653	384,573	1,354	2,770,537
\$5,000,000 under \$10,000,000.....	22	6,003	70	721,110	243	216,414	573	2,132,413
\$10,000,000 under \$20,000,000.....	40	19,951	32	567,094	132	216,695	254	1,849,118
\$20,000,000 or more.....	35	84,864	16	1,102,951	66	193,284	161	6,229,242
<b>Nontaxable returns, total.....</b>	<b>--</b>	<b>--</b>	<b>6,648</b>	<b>16,446,870</b>	<b>20,504</b>	<b>9,485,364</b>	<b>10,868</b>	<b>9,523,381</b>
\$600,000 under \$1,000,000.....	--	--	3,455	4,784,434	10,645	3,312,520	6,136	3,065,951
\$1,000,000 under \$2,500,000.....	--	--	2,565	6,426,537	8,001	3,977,010	3,653	3,111,017
\$2,500,000 under \$5,000,000.....	--	--	462	2,692,102	1,370	1,309,545	776	1,408,926
\$5,000,000 under \$10,000,000.....	--	--	123	1,460,472	385	534,052	231	979,162
\$10,000,000 under \$20,000,000.....	--	--	33	629,526	72	163,588	50	395,578
\$20,000,000 or more.....	--	--	10	453,800	31	188,649	22	562,747

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

\*\*Data deleted or combined to prevent disclosure of individual taxpayer data.

Note: Detail may not add to totals because of rounding.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1d.--Estate Tax Returns Filed in 1995: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Gross estate, tax purposes <sup>1</sup>		Type of property					
			Personal residence		Other real estate		Closely held stock	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All returns, total.....</b>	<b>69,772</b>	<b>117,735,156</b>	<b>42,383</b>	<b>8,368,602</b>	<b>39,154</b>	<b>14,956,820</b>	<b>9,258</b>	<b>7,924,664</b>
\$600,000 under \$1,000,000.....	37,329	28,556,829	21,660	3,241,239	19,177	3,927,753	2,797	546,917
\$1,000,000 under \$2,500,000.....	24,558	36,077,544	15,520	3,059,726	14,546	4,959,228	4,049	1,418,226
\$2,500,000 under \$5,000,000.....	5,331	18,105,550	3,473	1,074,520	3,578	2,375,339	1,478	1,165,298
\$5,000,000 under \$10,000,000.....	1,683	11,654,534	1,127	511,710	1,152	1,554,383	541	894,438
\$10,000,000 under \$20,000,000.....	571	7,862,146	384	252,646	449	954,299	248	885,179
\$20,000,000 or more.....	300	15,478,551	219	228,760	252	1,185,818	145	3,014,606
<b>Taxable returns, total.....</b>	<b>31,564</b>	<b>67,183,128</b>	<b>17,367</b>	<b>3,843,540</b>	<b>16,473</b>	<b>7,207,250</b>	<b>3,264</b>	<b>4,344,022</b>
\$600,000 under \$1,000,000.....	13,830	11,195,554	7,154	1,148,056	6,416	1,384,913	639	82,817
\$1,000,000 under \$2,500,000.....	12,710	18,845,531	7,064	1,427,208	6,715	2,255,183	1,303	439,572
\$2,500,000 under \$5,000,000.....	3,298	11,288,768	2,035	618,240	2,130	1,318,917	744	524,608
\$5,000,000 under \$10,000,000.....	1,105	7,769,030	685	303,179	714	847,755	320	458,374
\$10,000,000 under \$20,000,000.....	390	5,366,395	259	170,981	304	548,009	151	533,855
\$20,000,000 or more.....	231	12,717,850	169	175,876	194	852,473	106	2,304,797
<b>Nontaxable returns, total.....</b>	<b>38,207</b>	<b>50,552,028</b>	<b>25,017</b>	<b>4,525,062</b>	<b>22,681</b>	<b>7,749,570</b>	<b>5,994</b>	<b>3,580,642</b>
\$600,000 under \$1,000,000.....	23,498	17,361,275	14,506	2,093,184	12,762	2,542,840	2,158	464,099
\$1,000,000 under \$2,500,000.....	11,849	17,232,013	8,456	1,632,518	7,830	2,704,045	2,746	978,655
\$2,500,000 under \$5,000,000.....	2,032	6,816,782	1,439	456,280	1,448	1,056,422	734	640,690
\$5,000,000 under \$10,000,000.....	578	3,885,505	442	208,531	438	706,629	221	436,065
\$10,000,000 under \$20,000,000.....	182	2,495,751	124	81,665	145	406,290	96	351,324
\$20,000,000 or more.....	68	2,760,702	49	52,883	57	333,345	39	709,809

Size of gross estate	Type of property--Continued							
	Other stock		State and local bonds		Federal savings bonds		Other Federal bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>All returns, total.....</b>	<b>54,131</b>	<b>25,955,990</b>	<b>39,836</b>	<b>16,811,051</b>	<b>11,992</b>	<b>633,444</b>	<b>23,073</b>	<b>4,224,893</b>
\$600,000 under \$1,000,000.....	27,358	4,785,902	18,709	2,968,942	7,304	333,777	11,577	1,082,079
\$1,000,000 under \$2,500,000.....	19,879	7,311,512	15,169	4,621,397	3,816	246,338	8,322	1,291,970
\$2,500,000 under \$5,000,000.....	4,587	4,398,870	3,979	2,882,810	629	38,189	2,099	628,304
\$5,000,000 under \$10,000,000.....	1,507	3,326,603	1,314	2,041,939	176	10,025	695	479,129
\$10,000,000 under \$20,000,000.....	516	2,266,787	432	1,284,145	41	4,193	245	294,564
\$20,000,000 or more.....	284	3,866,316	234	3,011,817	26	922	134	448,848
<b>Taxable returns, total.....</b>	<b>25,717</b>	<b>17,672,905</b>	<b>19,611</b>	<b>11,224,666</b>	<b>5,839</b>	<b>358,537</b>	<b>11,730</b>	<b>2,731,205</b>
\$600,000 under \$1,000,000.....	10,606	2,220,507	6,989	1,238,054	3,118	149,039	4,570	447,506
\$1,000,000 under \$2,500,000.....	10,647	4,654,046	8,562	2,756,440	2,128	168,064	4,931	858,242
\$2,500,000 under \$5,000,000.....	2,871	3,137,365	2,655	2,069,404	412	32,197	1,452	484,241
\$5,000,000 under \$10,000,000.....	1,010	2,518,621	894	1,489,369	130	5,192	481	320,777
\$10,000,000 under \$20,000,000.....	364	1,687,131	320	1,005,216	30	3,180	184	216,352
\$20,000,000 or more.....	219	3,455,234	192	2,666,183	20	865	111	404,087
<b>Nontaxable returns, total.....</b>	<b>28,414</b>	<b>8,283,086</b>	<b>20,225</b>	<b>5,586,385</b>	<b>6,153</b>	<b>274,908</b>	<b>11,344</b>	<b>1,493,688</b>
\$600,000 under \$1,000,000.....	16,752	2,565,394	11,720	1,730,888	4,185	184,738	7,007	634,572
\$1,000,000 under \$2,500,000.....	9,232	2,657,466	6,607	1,864,957	1,688	78,275	3,391	433,728
\$2,500,000 under \$5,000,000.....	1,715	1,261,505	1,324	813,406	216	5,992	647	144,062
\$5,000,000 under \$10,000,000.....	498	807,982	420	552,570	46	4,833	214	158,352
\$10,000,000 under \$20,000,000.....	152	579,656	112	278,930	11	1,013	61	78,212
\$20,000,000 or more.....	64	411,082	41	345,634	6	57	23	44,762

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1d.--Estate Tax Returns Filed in 1995: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds		Cash	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
<b>All returns, total.....</b>	<b>12,686</b>	<b>767,842</b>	<b>8,675</b>	<b>534,656</b>	<b>18,409</b>	<b>1,467,938</b>	<b>68,821</b>	<b>13,386,664</b>
\$600,000 under \$1,000,000.....	5,787	208,811	4,421	206,906	9,358	549,155	36,697	5,262,208
\$1,000,000 under \$2,500,000.....	4,856	260,286	3,155	179,814	6,749	485,168	24,308	4,596,465
\$2,500,000 under \$5,000,000.....	1,376	133,697	746	73,756	1,562	218,030	5,275	1,657,905
\$5,000,000 under \$10,000,000.....	409	47,263	249	46,370	504	128,405	1,670	816,287
\$10,000,000 under \$20,000,000.....	156	43,382	70	9,441	136	43,902	571	462,482
\$20,000,000 or more.....	101	74,403	35	18,370	100	43,278	300	591,317
<b>Taxable returns, total.....</b>	<b>6,203</b>	<b>454,920</b>	<b>4,250</b>	<b>337,849</b>	<b>8,235</b>	<b>817,893</b>	<b>31,437</b>	<b>8,052,096</b>
\$600,000 under \$1,000,000.....	2,031	84,569	1,743	95,211	3,252	194,293	13,783	2,564,365
\$1,000,000 under \$2,500,000.....	2,830	155,165	1,783	116,770	3,535	305,353	12,655	2,886,316
\$2,500,000 under \$5,000,000.....	873	100,696	453	61,140	928	138,595	3,278	1,168,737
\$5,000,000 under \$10,000,000.....	284	34,651	190	40,050	344	108,240	1,099	613,649
\$10,000,000 under \$20,000,000.....	105	20,516	53	7,800	96	36,223	390	342,973
\$20,000,000 or more.....	80	59,322	29	16,878	79	35,189	231	476,056
<b>Nontaxable returns, total.....</b>	<b>6,483</b>	<b>312,923</b>	<b>4,425</b>	<b>196,807</b>	<b>10,174</b>	<b>650,045</b>	<b>37,384</b>	<b>5,334,568</b>
\$600,000 under \$1,000,000.....	3,756	124,242	2,678	111,695	6,106	354,863	22,914	2,697,843
\$1,000,000 under \$2,500,000.....	2,027	105,122	1,372	63,045	3,213	179,815	11,653	1,710,149
\$2,500,000 under \$5,000,000.....	504	33,001	293	12,616	634	79,435	1,997	489,169
\$5,000,000 under \$10,000,000.....	125	12,611	59	6,319	160	20,165	571	202,638
\$10,000,000 under \$20,000,000.....	51	22,865	17	1,641	40	7,679	182	119,509
\$20,000,000 or more.....	21	15,081	6	1,491	21	8,088	68	115,261

Size of gross estate	Type of property--Continued							
	Insurance, face value		Insurance, policy loans		Farm assets		Limited partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
<b>All returns, total.....</b>	<b>38,079</b>	<b>4,361,414</b>	<b>4,231</b>	<b>121,820</b>	<b>5,050</b>	<b>662,021</b>	<b>9,308</b>	<b>1,227,127</b>
\$600,000 under \$1,000,000.....	20,269	1,286,035	1,860	32,821	2,466	180,492	3,490	133,073
\$1,000,000 under \$2,500,000.....	13,635	1,953,902	1,761	57,358	2,033	251,512	3,626	243,024
\$2,500,000 under \$5,000,000.....	2,780	599,819	379	17,503	348	116,778	1,317	191,843
\$5,000,000 under \$10,000,000.....	929	237,627	136	7,304	109	30,734	512	178,906
\$10,000,000 under \$20,000,000.....	307	184,191	59	3,383	61	39,023	224	191,891
\$20,000,000 or more.....	158	99,840	36	3,451	33	43,483	139	288,391
<b>Taxable returns, total.....</b>	<b>14,135</b>	<b>1,257,849</b>	<b>1,147</b>	<b>42,818</b>	<b>2,104</b>	<b>319,286</b>	<b>3,807</b>	<b>667,450</b>
\$600,000 under \$1,000,000.....	6,134	276,552	361	7,338	829	44,907	1,004	47,474
\$1,000,000 under \$2,500,000.....	5,762	532,837	495	23,208	939	109,513	1,556	116,847
\$2,500,000 under \$5,000,000.....	1,391	201,777	166	6,316	213	75,324	666	93,601
\$5,000,000 under \$10,000,000.....	536	125,827	68	3,298	55	18,037	318	86,128
\$10,000,000 under \$20,000,000.....	193	61,508	35	1,199	42	30,821	155	141,026
\$20,000,000 or more.....	118	59,347	22	1,459	25	40,683	107	182,375
<b>Nontaxable returns, total.....</b>	<b>23,945</b>	<b>3,103,565</b>	<b>3,084</b>	<b>79,002</b>	<b>2,946</b>	<b>342,735</b>	<b>5,501</b>	<b>559,677</b>
\$600,000 under \$1,000,000.....	14,135	1,009,483	1,499	25,484	1,636	135,585	2,486	85,599
\$1,000,000 under \$2,500,000.....	7,873	1,421,065	1,266	34,150	1,094	141,999	2,070	126,177
\$2,500,000 under \$5,000,000.....	1,389	398,042	213	11,187	135	41,454	651	98,242
\$5,000,000 under \$10,000,000.....	394	111,800	68	4,006	54	12,697	194	92,778
\$10,000,000 under \$20,000,000.....	113	122,683	24	2,184	19	8,201	68	50,865
\$20,000,000 or more.....	40	40,492	14	1,992	8	2,799	32	106,016

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1d.--Estate Tax Returns Filed in 1995: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Other noncorporate businesses		Mortgages and notes		Annuities		Depletables/intangibles	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
<b>All returns, total.....</b>	<b>7,460</b>	<b>2,389,697</b>	<b>20,160</b>	<b>3,151,950</b>	<b>30,938</b>	<b>6,632,429</b>	<b>4,788</b>	<b>573,365</b>
\$600,000 under \$1,000,000.....	2,376	124,863	9,122	786,693	15,983	2,102,404	1,878	89,021
\$1,000,000 under \$2,500,000.....	3,138	332,307	7,648	1,092,321	11,408	2,684,618	1,957	150,035
\$2,500,000 under \$5,000,000.....	1,173	317,345	2,129	454,014	2,424	1,095,117	588	55,686
\$5,000,000 under \$10,000,000.....	445	185,481	772	309,432	750	422,479	208	39,402
\$10,000,000 under \$20,000,000.....	199	195,779	316	212,359	253	219,304	94	76,491
\$20,000,000 or more.....	129	1,233,923	173	297,132	120	108,506	63	162,730
<b>Taxable returns, total.....</b>	<b>2,856</b>	<b>1,503,729</b>	<b>9,137</b>	<b>1,614,207</b>	<b>11,266</b>	<b>2,305,011</b>	<b>2,532</b>	<b>236,518</b>
\$600,000 under \$1,000,000.....	654	25,711	3,277	275,058	4,916	634,324	800	30,477
\$1,000,000 under \$2,500,000.....	1,152	95,322	3,744	585,048	4,482	804,792	1,089	89,776
\$2,500,000 under \$5,000,000.....	592	130,175	1,250	255,680	1,201	441,086	397	39,792
\$5,000,000 under \$10,000,000.....	236	71,252	531	188,596	436	230,451	136	23,576
\$10,000,000 under \$20,000,000.....	126	117,077	208	113,234	150	121,689	63	26,464
\$20,000,000 or more.....	95	1,064,192	127	196,591	81	72,670	47	26,434
<b>Nontaxable returns, total.....</b>	<b>4,604</b>	<b>885,969</b>	<b>11,023</b>	<b>1,537,743</b>	<b>19,671</b>	<b>4,327,418</b>	<b>2,256</b>	<b>336,847</b>
\$600,000 under \$1,000,000.....	1,722	99,152	5,845	511,634	11,067	1,468,080	1,078	58,544
\$1,000,000 under \$2,500,000.....	1,985	236,985	3,904	507,273	6,925	1,879,826	868	60,260
\$2,500,000 under \$5,000,000.....	581	187,170	879	198,334	1,223	654,031	191	15,894
\$5,000,000 under \$10,000,000.....	209	114,229	241	120,836	314	192,028	72	15,826
\$10,000,000 under \$20,000,000.....	73	78,702	107	99,125	102	97,615	31	50,027
\$20,000,000 or more.....	34	169,731	46	100,541	39	35,837	16	136,296

Size of gross estate	Type of property--Continued				Type of deductions			
	Art		Other assets		Funeral expenses		Executors' commissions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
<b>All returns, total.....</b>	<b>1,878</b>	<b>412,317</b>	<b>62,620</b>	<b>3,414,119</b>	<b>63,720</b>	<b>414,003</b>	<b>23,403</b>	<b>982,113</b>
\$600,000 under \$1,000,000.....	538	18,831	32,686	754,562	33,887	198,001	10,530	176,622
\$1,000,000 under \$2,500,000.....	790	51,399	22,437	945,665	22,444	146,552	9,127	306,759
\$2,500,000 under \$5,000,000.....	282	57,660	5,032	588,077	4,997	41,703	2,491	183,198
\$5,000,000 under \$10,000,000.....	149	56,993	1,611	344,232	1,585	14,908	811	107,803
\$10,000,000 under \$20,000,000.....	69	57,551	561	187,922	529	6,603	283	69,009
\$20,000,000 or more.....	50	169,883	293	593,661	278	6,236	160	138,722
<b>Taxable returns, total.....</b>	<b>944</b>	<b>268,189</b>	<b>28,502</b>	<b>2,008,832</b>	<b>30,445</b>	<b>197,386</b>	<b>17,811</b>	<b>840,900</b>
\$600,000 under \$1,000,000.....	167	1,726	12,026	257,334	13,277	74,921	6,477	111,997
\$1,000,000 under \$2,500,000.....	409	24,622	11,649	487,628	12,265	76,453	7,942	269,930
\$2,500,000 under \$5,000,000.....	167	19,767	3,147	383,743	3,227	26,291	2,259	168,925
\$5,000,000 under \$10,000,000.....	111	42,325	1,071	246,280	1,087	10,306	732	96,832
\$10,000,000 under \$20,000,000.....	50	43,527	382	140,013	370	4,198	251	59,971
\$20,000,000 or more.....	40	136,222	228	493,834	219	5,218	149	133,246
<b>Nontaxable returns, total.....</b>	<b>934</b>	<b>144,128</b>	<b>34,117</b>	<b>1,405,287</b>	<b>33,274</b>	<b>216,617</b>	<b>5,592</b>	<b>141,213</b>
\$600,000 under \$1,000,000.....	371	17,105	20,660	497,227	20,610	123,080	4,053	64,625
\$1,000,000 under \$2,500,000.....	381	26,777	10,788	458,037	10,179	70,099	1,185	36,830
\$2,500,000 under \$5,000,000.....	114	37,893	1,885	204,334	1,770	15,412	232	14,273
\$5,000,000 under \$10,000,000.....	39	14,668	541	97,952	497	4,602	80	10,972
\$10,000,000 under \$20,000,000.....	19	14,024	180	47,909	159	2,405	31	9,037
\$20,000,000 or more.....	10	33,661	64	99,827	58	1,017	11	5,476

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1d.--Estate Tax Returns Filed in 1995: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of deductions--Continued							
	Attorneys' fees		Other expenses/losses		Debts and mortgages		Bequests to surviving spouse	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns, total.....	43,340	895,347	49,027	698,279	54,099	6,099,714	31,351	35,729,317
\$600,000 under \$1,000,000.....	22,607	252,814	25,887	160,901	27,522	1,880,279	14,902	5,390,208
\$1,000,000 under \$2,500,000.....	15,388	298,797	17,259	215,601	19,670	1,585,623	12,271	10,512,192
\$2,500,000 under \$5,000,000.....	3,521	137,419	3,918	102,157	4,605	854,338	2,799	6,318,204
\$5,000,000 under \$10,000,000.....	1,194	82,662	1,284	77,841	1,484	675,601	890	4,238,256
\$10,000,000 under \$20,000,000.....	403	46,674	440	45,594	533	394,742	321	3,205,128
\$20,000,000 or more.....	226	76,980	239	96,185	285	709,131	169	6,065,329
Taxable returns, total.....	27,993	679,972	29,559	563,187	27,839	2,081,399	4,127	8,813,231
\$600,000 under \$1,000,000.....	12,308	144,881	12,943	95,842	11,606	199,014	733	75,842
\$1,000,000 under \$2,500,000.....	11,343	237,601	12,004	178,816	11,496	548,973	1,779	889,471
\$2,500,000 under \$5,000,000.....	2,843	116,705	3,038	92,148	3,083	401,126	962	1,474,347
\$5,000,000 under \$10,000,000.....	968	72,198	1,020	65,419	1,051	327,875	386	1,354,920
\$10,000,000 under \$20,000,000.....	335	39,129	349	39,015	378	194,593	158	1,229,295
\$20,000,000 or more.....	196	69,457	206	91,946	224	409,817	108	3,789,356
Nontaxable returns, total.....	15,348	215,376	19,468	135,091	26,260	4,018,315	27,224	26,916,086
\$600,000 under \$1,000,000.....	10,299	107,933	12,944	65,059	15,916	1,681,264	14,169	5,314,366
\$1,000,000 under \$2,500,000.....	4,045	61,196	5,255	36,785	8,174	1,036,650	10,491	9,622,721
\$2,500,000 under \$5,000,000.....	678	20,714	880	10,009	1,522	453,211	1,837	4,843,857
\$5,000,000 under \$10,000,000.....	227	10,464	265	12,422	433	347,726	504	2,883,336
\$10,000,000 under \$20,000,000.....	68	7,545	91	6,579	155	200,149	162	1,975,833
\$20,000,000 or more.....	30	7,523	33	4,239	60	299,314	61	2,275,972

Size of gross estate	Type of deductions--Continued				Taxable estate		Adjusted taxable gifts	
	Charitable deduction		Total allowable deductions					
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(57)	(58)	(59)	(60)	(61)	(62)	(63)	(64)
All returns, total.....	13,063	8,706,603	69,752	53,418,117	65,088	65,606,946	8,564	3,308,764
\$600,000 under \$1,000,000.....	5,829	976,317	37,315	9,028,327	34,433	20,535,340	2,449	446,794
\$1,000,000 under \$2,500,000.....	4,955	1,762,817	24,553	14,739,544	23,077	21,390,972	3,195	783,942
\$2,500,000 under \$5,000,000.....	1,385	938,840	5,331	8,572,597	5,148	9,574,165	1,637	797,423
\$5,000,000 under \$10,000,000.....	542	956,914	1,683	6,147,284	1,607	5,627,390	748	503,688
\$10,000,000 under \$20,000,000.....	206	652,453	571	4,419,932	534	3,449,630	336	333,158
\$20,000,000 or more.....	146	3,419,261	300	10,510,435	288	5,029,448	199	443,760
Taxable returns, total.....	6,877	4,979,759	31,545	18,147,516	31,564	49,035,606	5,955	2,708,837
\$600,000 under \$1,000,000.....	2,224	58,389	13,816	760,886	13,830	10,434,666	1,495	337,176
\$1,000,000 under \$2,500,000.....	2,932	441,045	12,704	2,642,082	12,710	16,203,447	2,145	610,643
\$2,500,000 under \$5,000,000.....	1,003	374,050	3,298	2,653,589	3,298	8,635,178	1,276	625,596
\$5,000,000 under \$10,000,000.....	415	475,052	1,105	2,395,900	1,105	5,373,129	604	413,770
\$10,000,000 under \$20,000,000.....	170	415,424	390	1,981,626	390	3,384,769	265	292,994
\$20,000,000 or more.....	133	3,215,800	231	7,713,432	231	5,004,417	168	428,658
Nontaxable returns, total.....	6,186	3,726,844	38,207	35,270,602	33,523	16,571,340	2,609	599,927
\$600,000 under \$1,000,000.....	3,605	917,928	23,498	8,267,441	20,603	10,100,675	953	109,617
\$1,000,000 under \$2,500,000.....	2,023	1,321,773	11,849	12,097,462	10,368	5,187,525	1,050	173,299
\$2,500,000 under \$5,000,000.....	382	564,790	2,032	5,919,008	1,850	938,987	361	171,827
\$5,000,000 under \$10,000,000.....	127	481,862	578	3,751,384	502	254,261	144	89,917
\$10,000,000 under \$20,000,000.....	36	237,029	182	2,438,305	145	64,861	70	40,164
\$20,000,000 or more.....	13	203,462	68	2,797,003	56	25,031	31	15,102

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1d.—Estate Tax Returns Filed in 1995: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of gross estate	Adjusted taxable estate		Tentative estate tax		Gift tax		Estate tax before credits	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(65)	(66)	(67)	(68)	(69)	(70)	(71)	(72)
<b>All returns, total.....</b>	<b>65,303</b>	<b>68,915,710</b>	<b>65,282</b>	<b>27,009,059</b>	<b>1,565</b>	<b>623,048</b>	<b>65,218</b>	<b>26,386,010</b>
\$600,000 under \$1,000,000.....	34,480	20,982,134	34,480	6,838,958	295	27,736	34,418	6,811,221
\$1,000,000 under \$2,500,000.....	23,163	22,174,914	23,142	7,885,782	333	49,047	23,140	7,836,735
\$2,500,000 under \$5,000,000.....	5,181	10,371,588	5,181	4,395,383	396	145,314	5,181	4,250,069
\$5,000,000 under \$10,000,000.....	1,635	6,131,077	1,635	2,933,138	271	108,707	1,635	2,824,431
\$10,000,000 under \$20,000,000.....	550	3,782,789	550	1,966,064	150	100,414	550	1,865,651
\$20,000,000 or more.....	295	5,473,208	295	2,989,733	119	191,829	295	2,797,904
<b>Taxable returns, total.....</b>	<b>31,564</b>	<b>51,744,443</b>	<b>31,564</b>	<b>21,515,167</b>	<b>1,252</b>	<b>522,260</b>	<b>31,564</b>	<b>20,992,906</b>
\$600,000 under \$1,000,000.....	13,830	10,771,842	13,830	3,603,152	112	13,572	13,830	3,589,580
\$1,000,000 under \$2,500,000.....	12,710	16,814,090	12,710	6,176,586	273	48,493	12,710	6,128,092
\$2,500,000 under \$5,000,000.....	3,298	9,260,774	3,298	4,017,901	371	99,269	3,298	3,918,632
\$5,000,000 under \$10,000,000.....	1,105	5,786,900	1,105	2,811,164	249	78,774	1,105	2,732,390
\$10,000,000 under \$20,000,000.....	390	3,677,763	390	1,929,907	135	91,982	390	1,837,925
\$20,000,000 or more.....	231	5,433,075	231	2,976,458	112	190,170	231	2,786,287
<b>Nontaxable returns, total.....</b>	<b>33,739</b>	<b>17,171,267</b>	<b>33,718</b>	<b>5,493,891</b>	<b>312</b>	<b>100,787</b>	<b>33,653</b>	<b>5,393,104</b>
\$600,000 under \$1,000,000.....	20,650	10,210,292	20,650	3,235,806	183	14,165	20,587	3,221,641
\$1,000,000 under \$2,500,000.....	10,453	5,360,824	10,432	1,709,196	60	553	10,430	1,708,643
\$2,500,000 under \$5,000,000.....	1,883	1,110,814	1,883	377,482	25	46,045	1,883	331,436
\$5,000,000 under \$10,000,000.....	530	344,178	530	121,974	23	29,933	530	92,041
\$10,000,000 under \$20,000,000.....	161	105,026	161	36,157	15	8,432	161	27,726
\$20,000,000 or more.....	63	40,133	63	13,276	7	1,659	63	11,617

Size of gross estate	Allowable unified credit		State death tax credit		Other tax credits		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(73)	(74)	(75)	(76)	(77)	(78)	(79)	(80)
<b>All returns, total.....</b>	<b>68,958</b>	<b>13,286,444</b>	<b>37,084</b>	<b>3,016,316</b>	<b>890</b>	<b>166,842</b>	<b>31,564</b>	<b>11,841,034</b>
\$600,000 under \$1,000,000.....	36,747	7,078,939	17,872	319,429	165	1,901	13,830	651,160
\$1,000,000 under \$2,500,000.....	24,361	4,696,541	13,890	667,104	480	56,298	12,710	2,999,760
\$2,500,000 under \$5,000,000.....	5,312	1,022,621	3,520	527,951	124	23,921	3,298	2,748,165
\$5,000,000 under \$10,000,000.....	1,678	323,159	1,156	446,922	80	22,449	1,105	2,053,433
\$10,000,000 under \$20,000,000.....	561	107,886	408	374,253	30	4,376	390	1,384,768
\$20,000,000 or more.....	298	57,298	237	680,657	11	57,898	231	2,003,748
<b>Taxable returns, total.....</b>	<b>31,534</b>	<b>6,077,553</b>	<b>30,658</b>	<b>2,932,391</b>	<b>735</b>	<b>141,922</b>	<b>31,564</b>	<b>11,841,034</b>
\$600,000 under \$1,000,000.....	13,806	2,661,423	13,229	276,477	115	517	13,830	651,160
\$1,000,000 under \$2,500,000.....	12,704	2,448,307	12,515	642,081	391	37,942	12,710	2,999,760
\$2,500,000 under \$5,000,000.....	3,298	635,650	3,223	513,287	121	21,530	3,298	2,748,165
\$5,000,000 under \$10,000,000.....	1,105	212,785	1,080	446,075	70	20,096	1,105	2,053,433
\$10,000,000 under \$20,000,000.....	389	74,830	383	373,999	**38	**61,838	390	1,384,768
\$20,000,000 or more.....	231	44,558	228	680,471	**	**	231	2,003,748
<b>Nontaxable returns, total.....</b>	<b>37,424</b>	<b>7,208,891</b>	<b>6,425</b>	<b>83,925</b>	<b>155</b>	<b>24,919</b>	<b>--</b>	<b>--</b>
\$600,000 under \$1,000,000.....	22,941	4,417,516	4,644	42,952	50	1,384	--	--
\$1,000,000 under \$2,500,000.....	11,657	2,248,234	1,376	25,023	89	18,356	--	--
\$2,500,000 under \$5,000,000.....	2,014	386,971	297	14,664	4	2,391	--	--
\$5,000,000 under \$10,000,000.....	573	110,373	76	847	10	2,353	--	--
\$10,000,000 under \$20,000,000.....	173	33,056	25	254	**3	**435	--	--
\$20,000,000 or more.....	66	12,740	8	186	**	**	--	--

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 1d.—Estate Tax Returns Filed in 1995: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of gross estate	Generation-skipping tax		Community property		Full value, property held with spouse		Total lifetime transfers	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(81)	(82)	(83)	(84)	(85)	(86)	(87)	(88)
<b>All returns, total.....</b>	<b>205</b>	<b>85,125</b>	<b>7,787</b>	<b>21,032,974</b>	<b>24,577</b>	<b>12,023,696</b>	<b>21,164</b>	<b>26,648,371</b>
\$600,000 under \$1,000,000.....	14	24	3,678	4,900,559	11,994	3,707,342	9,778	5,054,826
\$1,000,000 under \$2,500,000.....	10	647	3,090	7,452,356	9,464	4,376,065	7,791	7,365,580
\$2,500,000 under \$5,000,000.....	52	5,871	699	3,630,554	2,082	1,693,312	2,209	4,406,432
\$5,000,000 under \$10,000,000.....	61	10,871	204	1,991,032	671	763,521	860	3,160,925
\$10,000,000 under \$20,000,000.....	31	12,688	72	1,355,509	245	538,595	318	2,552,672
\$20,000,000 or more.....	36	55,025	43	1,702,964	120	944,861	209	4,107,936
<b>Taxable returns, total.....</b>	<b>205</b>	<b>85,125</b>	<b>889</b>	<b>3,837,490</b>	<b>3,264</b>	<b>1,718,510</b>	<b>9,802</b>	<b>16,072,566</b>
\$600,000 under \$1,000,000.....	14	24	225	281,530	701	89,618	3,407	1,859,518
\$1,000,000 under \$2,500,000.....	10	647	332	709,993	1,409	457,060	4,059	4,173,782
\$2,500,000 under \$5,000,000.....	52	5,871	225	1,113,880	668	401,564	1,339	2,686,181
\$5,000,000 under \$10,000,000.....	61	10,871	53	414,988	289	367,437	582	2,073,265
\$10,000,000 under \$20,000,000.....	31	12,688	32	563,735	120	169,610	239	1,903,017
\$20,000,000 or more.....	36	55,025	22	753,364	77	233,222	175	3,376,803
<b>Nontaxable returns, total.....</b>	<b>--</b>	<b>--</b>	<b>6,897</b>	<b>17,195,484</b>	<b>21,313</b>	<b>10,305,186</b>	<b>11,362</b>	<b>10,575,805</b>
\$600,000 under \$1,000,000.....	--	--	3,453	4,619,030	11,294	3,617,724	6,371	3,195,308
\$1,000,000 under \$2,500,000.....	--	--	2,758	6,742,363	8,055	3,919,005	3,732	3,191,798
\$2,500,000 under \$5,000,000.....	--	--	474	2,516,674	1,414	1,291,747	870	1,720,252
\$5,000,000 under \$10,000,000.....	--	--	151	1,576,044	382	396,085	277	1,087,660
\$10,000,000 under \$20,000,000.....	--	--	40	791,775	124	368,985	78	649,655
\$20,000,000 or more.....	--	--	21	949,600	43	711,639	33	731,132

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

\*\*Data deleted or combined to prevent disclosure of individual taxpayer data.

Note: Detail may not add to totals because of rounding.



# Federal Taxation of Wealth Transfers, 1992-1995

**Table 2.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Gross estate, date-of-death <sup>1</sup>		Type of property					
			Personal residence		Other real estate		Real estate partnerships	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All returns, total.....</b>	<b>60,082</b>	<b>104,453,728</b>	<b>36,389</b>	<b>7,454,466</b>	<b>32,752</b>	<b>12,873,806</b>	<b>3,194</b>	<b>809,709</b>
\$600,000 under \$1,000,000.....	31,724	24,329,330	18,330	2,771,926	15,886	3,345,708	1,053	67,665
\$1,000,000 under \$2,500,000.....	21,489	31,600,054	13,503	2,749,522	12,343	4,677,798	1,356	162,053
\$2,500,000 under \$5,000,000.....	4,469	15,276,723	2,934	930,329	2,863	2,054,439	466	139,676
\$5,000,000 under \$10,000,000.....	1,608	10,925,991	1,073	534,574	1,082	1,276,671	197	125,572
\$10,000,000 under \$20,000,000.....	529	7,155,584	364	242,903	380	786,062	72	78,791
\$20,000,000 or more.....	263	15,166,045	185	225,211	197	733,128	50	235,952
<b>Taxable returns, total.....</b>	<b>27,243</b>	<b>59,822,421</b>	<b>14,948</b>	<b>3,562,520</b>	<b>13,653</b>	<b>6,068,368</b>	<b>1,375</b>	<b>385,845</b>
\$600,000 under \$1,000,000.....	11,659	9,471,822	6,015	985,345	5,234	1,131,167	344	17,034
\$1,000,000 under \$2,500,000.....	11,244	16,731,177	6,138	1,327,419	5,754	2,125,375	573	42,709
\$2,500,000 under \$5,000,000.....	2,667	9,170,580	1,688	546,469	1,572	1,108,214	268	52,634
\$5,000,000 under \$10,000,000.....	1,083	7,432,809	698	355,810	670	685,722	101	52,646
\$10,000,000 under \$20,000,000.....	382	5,246,951	260	162,811	266	445,488	51	44,842
\$20,000,000 or more.....	208	11,769,083	149	184,667	156	572,402	38	175,980
<b>Nontaxable returns, total.....</b>	<b>32,839</b>	<b>44,631,307</b>	<b>21,442</b>	<b>3,891,945</b>	<b>19,099</b>	<b>6,805,439</b>	<b>1,819</b>	<b>423,864</b>
\$600,000 under \$1,000,000.....	20,065	14,857,508	12,316	1,786,580	10,651	2,214,541	709	50,631
\$1,000,000 under \$2,500,000.....	10,246	14,868,877	7,366	1,422,104	6,589	2,552,423	782	119,345
\$2,500,000 under \$5,000,000.....	1,802	6,106,143	1,246	383,860	1,291	946,224	198	87,042
\$5,000,000 under \$10,000,000.....	525	3,493,183	375	178,764	412	590,949	96	72,926
\$10,000,000 under \$20,000,000.....	147	1,908,634	103	80,093	115	340,574	21	33,949
\$20,000,000 or more.....	55	3,396,962	35	40,545	41	160,727	12	59,972

Size of gross estate	Type of property--Continued							
	Closely held stock		Other stock		State and local bonds		Federal savings bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>All returns, total.....</b>	<b>7,643</b>	<b>8,108,778</b>	<b>46,592</b>	<b>24,370,660</b>	<b>33,047</b>	<b>13,015,873</b>	<b>9,117</b>	<b>454,395</b>
\$600,000 under \$1,000,000.....	2,248	460,947	23,231	4,391,335	14,776	2,346,575	5,250	238,900
\$1,000,000 under \$2,500,000.....	3,361	1,204,110	17,320	6,543,043	13,301	4,099,551	3,085	165,434
\$2,500,000 under \$5,000,000.....	1,173	869,214	3,890	3,956,832	3,164	2,342,513	541	32,399
\$5,000,000 under \$10,000,000.....	517	979,272	1,416	3,109,794	1,193	1,742,722	174	14,351
\$10,000,000 under \$20,000,000.....	207	800,067	489	2,144,061	414	1,080,557	46	1,717
\$20,000,000 or more.....	137	3,795,169	246	4,225,595	199	1,403,954	21	1,595
<b>Taxable returns, total.....</b>	<b>2,638</b>	<b>3,797,543</b>	<b>22,387</b>	<b>16,885,742</b>	<b>16,897</b>	<b>8,677,495</b>	<b>4,327</b>	<b>246,531</b>
\$600,000 under \$1,000,000.....	369	102,929	9,069	2,116,084	6,005	1,048,080	2,028	105,363
\$1,000,000 under \$2,500,000.....	1,216	430,273	9,418	4,161,799	7,523	2,505,737	1,766	105,837
\$2,500,000 under \$5,000,000.....	528	376,660	2,371	2,690,627	2,037	1,642,026	353	21,401
\$5,000,000 under \$10,000,000.....	287	497,220	975	2,428,246	854	1,354,287	129	11,891
\$10,000,000 under \$20,000,000.....	139	539,845	355	1,734,001	310	887,397	36	1,289
\$20,000,000 or more.....	99	1,850,616	199	3,754,985	167	1,239,968	15	751
<b>Nontaxable returns, total.....</b>	<b>5,005</b>	<b>4,311,235</b>	<b>24,206</b>	<b>7,484,917</b>	<b>16,151</b>	<b>4,338,378</b>	<b>4,791</b>	<b>207,864</b>
\$600,000 under \$1,000,000.....	1,879	358,017	14,162	2,275,251	8,771	1,298,495	3,222	133,536
\$1,000,000 under \$2,500,000.....	2,145	773,837	7,903	2,381,244	5,777	1,593,814	1,319	59,597
\$2,500,000 under \$5,000,000.....	645	492,554	1,519	1,266,205	1,128	700,488	188	10,998
\$5,000,000 under \$10,000,000.....	230	482,052	442	681,548	339	388,435	45	2,460
\$10,000,000 under \$20,000,000.....	68	260,222	134	410,060	105	193,160	10	428
\$20,000,000 or more.....	38	1,944,552	47	470,611	31	163,986	6	844

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 2.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Other Federal bonds		Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
<b>All returns, total.....</b>	<b>20,375</b>	<b>4,603,842</b>	<b>14,390</b>	<b>938,327</b>	<b>4,987</b>	<b>309,062</b>	<b>13,277</b>	<b>1,135,304</b>
\$600,000 under \$1,000,000.....	10,315	982,930	7,083	287,548	2,490	112,109	6,491	408,402
\$1,000,000 under \$2,500,000.....	7,206	1,226,149	5,226	236,400	1,832	112,782	5,105	339,579
\$2,500,000 under \$5,000,000.....	1,755	626,719	1,318	109,213	466	46,243	1,113	183,328
\$5,000,000 under \$10,000,000.....	676	463,287	487	59,321	140	20,940	389	84,405
\$10,000,000 under \$20,000,000.....	265	351,037	167	60,318	37	6,662	116	58,978
\$20,000,000 or more.....	157	953,720	109	185,527	21	10,326	62	60,612
<b>Taxable returns, total.....</b>	<b>10,187</b>	<b>3,147,500</b>	<b>7,314</b>	<b>600,644</b>	<b>2,529</b>	<b>204,076</b>	<b>6,342</b>	<b>666,279</b>
\$600,000 under \$1,000,000.....	3,902	416,804	2,847	108,192	1,048	64,935	2,544	170,540
\$1,000,000 under \$2,500,000.....	4,290	777,133	3,094	163,522	1,017	71,124	2,748	215,943
\$2,500,000 under \$5,000,000.....	1,162	442,682	826	74,415	322	37,028	650	121,229
\$5,000,000 under \$10,000,000.....	498	377,124	338	41,293	97	17,154	267	59,518
\$10,000,000 under \$20,000,000.....	203	279,135	120	41,263	28	6,116	85	40,610
\$20,000,000 or more.....	130	854,623	89	171,959	16	7,720	48	58,439
<b>Nontaxable returns, total.....</b>	<b>10,188</b>	<b>1,456,341</b>	<b>7,076</b>	<b>337,682</b>	<b>2,458</b>	<b>104,986</b>	<b>6,936</b>	<b>469,026</b>
\$600,000 under \$1,000,000.....	6,413	566,126	4,236	179,356	1,442	47,175	3,948	237,861
\$1,000,000 under \$2,500,000.....	2,916	449,016	2,132	72,877	815	41,659	2,357	123,636
\$2,500,000 under \$5,000,000.....	593	184,037	492	34,799	144	9,215	464	62,100
\$5,000,000 under \$10,000,000.....	178	86,163	149	18,028	43	3,786	123	24,887
\$10,000,000 under \$20,000,000.....	62	71,901	47	19,055	9	546	30	18,369
\$20,000,000 or more.....	26	99,097	20	13,568	5	2,605	14	2,173

Size of gross estate	Type of property--Continued							
	Cash		Insurance, face value		Insurance, policy loans		Farm assets	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
<b>All returns, total.....</b>	<b>59,377</b>	<b>12,072,825</b>	<b>33,143</b>	<b>3,669,101</b>	<b>4,883</b>	<b>120,771</b>	<b>4,230</b>	<b>859,170</b>
\$600,000 under \$1,000,000.....	31,279	4,622,368	17,277	1,152,589	2,125	36,223	2,410	153,640
\$1,000,000 under \$2,500,000.....	21,292	4,261,131	12,176	1,548,193	1,980	40,962	1,365	136,099
\$2,500,000 under \$5,000,000.....	4,425	1,272,452	2,407	533,661	531	23,676	281	75,003
\$5,000,000 under \$10,000,000.....	1,592	822,457	844	265,059	165	13,136	110	29,606
\$10,000,000 under \$20,000,000.....	526	514,577	294	95,705	56	3,485	39	9,530
\$20,000,000 or more.....	263	579,840	145	73,894	27	3,289	25	455,291
<b>Taxable returns, total.....</b>	<b>27,084</b>	<b>7,214,767</b>	<b>12,321</b>	<b>1,012,425</b>	<b>1,307</b>	<b>41,065</b>	<b>1,987</b>	<b>629,918</b>
\$600,000 under \$1,000,000.....	11,560	2,081,436	5,150	214,150	334	3,896	1,033	70,011
\$1,000,000 under \$2,500,000.....	11,204	2,752,202	5,186	401,571	610	14,227	668	43,747
\$2,500,000 under \$5,000,000.....	2,652	851,363	1,179	172,764	223	9,615	170	37,325
\$5,000,000 under \$10,000,000.....	1,078	605,078	491	113,462	81	8,656	69	21,362
\$10,000,000 under \$20,000,000.....	382	406,638	202	51,043	39	2,205	27	5,233
\$20,000,000 or more.....	208	518,051	112	59,436	21	2,466	21	452,239
<b>Nontaxable returns, total.....</b>	<b>32,293</b>	<b>4,858,057</b>	<b>20,822</b>	<b>2,656,676</b>	<b>3,576</b>	<b>79,705</b>	<b>2,243</b>	<b>229,252</b>
\$600,000 under \$1,000,000.....	19,719	2,540,932	12,127	938,439	1,791	32,327	1,377	83,629
\$1,000,000 under \$2,500,000.....	10,087	1,508,930	6,990	1,146,622	1,370	26,735	697	92,352
\$2,500,000 under \$5,000,000.....	1,772	421,089	1,228	360,898	308	14,061	112	37,678
\$5,000,000 under \$10,000,000.....	514	217,379	353	151,597	84	4,479	41	8,244
\$10,000,000 under \$20,000,000.....	144	107,939	91	44,661	17	1,280	12	4,297
\$20,000,000 or more.....	55	61,789	32	14,458	6	823	4	3,052

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 2.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of property--Continued							
	Limited partnerships		Other noncorporate businesses		Mortgages and notes		Annuities	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
<b>All returns, total.....</b>	<b>7,468</b>	<b>992,989</b>	<b>8,689</b>	<b>1,929,443</b>	<b>18,294</b>	<b>2,674,355</b>	<b>24,558</b>	<b>4,674,334</b>
\$600,000 under \$1,000,000.....	2,828	93,408	2,931	151,460	8,432	677,073	12,536	1,439,508
\$1,000,000 under \$2,500,000.....	2,851	143,644	3,666	400,154	6,802	821,423	9,209	1,878,899
\$2,500,000 under \$5,000,000.....	1,077	150,552	1,267	298,903	1,847	420,428	1,868	729,690
\$5,000,000 under \$10,000,000.....	427	148,174	499	232,043	762	272,259	633	388,470
\$10,000,000 under \$20,000,000.....	183	74,287	198	181,692	282	200,652	203	140,117
\$20,000,000 or more.....	100	382,923	128	665,192	169	282,520	109	97,650
<b>Taxable returns, total.....</b>	<b>3,219</b>	<b>630,323</b>	<b>3,535</b>	<b>1,089,762</b>	<b>8,101</b>	<b>1,357,914</b>	<b>8,232</b>	<b>1,492,597</b>
\$600,000 under \$1,000,000.....	908	27,227	798	24,292	2,964	231,040	3,436	352,174
\$1,000,000 under \$2,500,000.....	1,285	53,014	1,568	153,138	3,310	407,592	3,453	534,369
\$2,500,000 under \$5,000,000.....	559	74,472	627	130,483	1,025	215,582	796	253,212
\$5,000,000 under \$10,000,000.....	263	84,054	307	138,810	467	153,031	340	190,668
\$10,000,000 under \$20,000,000.....	123	43,785	131	112,412	200	108,703	127	96,829
\$20,000,000 or more.....	81	347,770	103	530,626	134	241,965	80	65,345
<b>Nontaxable returns, total.....</b>	<b>4,248</b>	<b>362,666</b>	<b>5,154</b>	<b>839,682</b>	<b>10,193</b>	<b>1,316,441</b>	<b>16,326</b>	<b>3,181,736</b>
\$600,000 under \$1,000,000.....	1,920	66,181	2,133	127,167	5,468	446,033	9,100	1,087,334
\$1,000,000 under \$2,500,000.....	1,566	90,630	2,098	247,016	3,492	413,831	5,756	1,344,530
\$2,500,000 under \$5,000,000.....	518	76,080	640	168,420	822	204,845	1,072	476,478
\$5,000,000 under \$10,000,000.....	165	64,120	191	93,233	296	119,228	293	197,802
\$10,000,000 under \$20,000,000.....	60	30,502	67	69,280	81	91,949	76	43,288
\$20,000,000 or more.....	19	35,153	24	134,566	34	40,556	28	32,305

Size of gross estate	Type of property--Continued						Type of deductions	
	Depletables/intangibles		Art		Other assets		Funeral expenses	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
<b>All returns, total.....</b>	<b>4,579</b>	<b>387,827</b>	<b>1,402</b>	<b>436,406</b>	<b>54,275</b>	<b>2,803,855</b>	<b>55,215</b>	<b>330,311</b>
\$600,000 under \$1,000,000.....	2,075	75,767	437	7,575	27,966	578,134	29,007	156,001
\$1,000,000 under \$2,500,000.....	1,622	100,681	460	26,803	19,762	807,579	19,739	120,482
\$2,500,000 under \$5,000,000.....	475	46,318	238	39,657	4,239	442,831	4,212	31,757
\$5,000,000 under \$10,000,000.....	242	38,654	139	47,530	1,537	283,967	1,512	12,649
\$10,000,000 under \$20,000,000.....	99	45,739	65	60,897	511	224,720	496	4,894
\$20,000,000 or more.....	65	80,668	62	253,944	260	466,624	249	4,527
<b>Taxable returns, total.....</b>	<b>2,230</b>	<b>201,126</b>	<b>716</b>	<b>280,125</b>	<b>24,458</b>	<b>1,711,990</b>	<b>26,475</b>	<b>154,359</b>
\$600,000 under \$1,000,000.....	809	28,719	180	1,968	9,874	178,228	11,365	57,520
\$1,000,000 under \$2,500,000.....	805	39,939	184	8,109	10,428	424,856	10,870	62,580
\$2,500,000 under \$5,000,000.....	320	26,124	154	19,814	2,536	285,671	2,614	18,713
\$5,000,000 under \$10,000,000.....	165	30,032	101	22,720	1,043	201,338	1,056	8,604
\$10,000,000 under \$20,000,000.....	77	21,390	49	31,081	370	189,244	373	3,620
\$20,000,000 or more.....	54	54,924	48	196,433	207	432,653	198	3,323
<b>Nontaxable returns, total.....</b>	<b>2,349</b>	<b>186,701</b>	<b>686</b>	<b>156,281</b>	<b>29,817</b>	<b>1,091,865</b>	<b>28,740</b>	<b>175,952</b>
\$600,000 under \$1,000,000.....	1,266	47,049	257	5,607	18,092	399,906	17,642	98,481
\$1,000,000 under \$2,500,000.....	817	60,742	276	18,695	9,334	382,722	8,870	57,902
\$2,500,000 under \$5,000,000.....	155	20,194	84	19,842	1,703	157,161	1,599	13,045
\$5,000,000 under \$10,000,000.....	78	8,622	38	24,810	494	82,629	456	4,045
\$10,000,000 under \$20,000,000.....	22	24,349	16	29,816	141	35,475	123	1,274
\$20,000,000 or more.....	11	25,745	14	57,511	53	33,971	51	1,205

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 2.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Type of deductions--Continued							
	Executors' commissions		Attorneys' fees		Other expenses/losses		Debts and mortgages	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
<b>All returns, total.....</b>	<b>20,665</b>	<b>888,264</b>	<b>36,755</b>	<b>795,986</b>	<b>43,832</b>	<b>737,943</b>	<b>46,949</b>	<b>4,547,611</b>
\$600,000 under \$1,000,000.....	9,336	158,116	19,087	210,506	22,687	133,738	23,659	717,843
\$1,000,000 under \$2,500,000.....	7,980	260,511	12,986	262,256	15,778	231,908	17,171	1,355,282
\$2,500,000 under \$5,000,000.....	2,083	152,164	2,955	122,868	3,404	120,284	3,955	790,997
\$5,000,000 under \$10,000,000.....	815	105,124	1,128	80,123	1,289	89,598	1,429	670,918
\$10,000,000 under \$20,000,000.....	309	77,413	398	52,453	445	61,800	482	375,608
\$20,000,000 or more.....	141	134,936	202	67,781	229	100,615	253	636,963
<b>Taxable returns, total.....</b>	<b>16,025</b>	<b>770,436</b>	<b>23,934</b>	<b>616,507</b>	<b>26,395</b>	<b>608,327</b>	<b>24,047</b>	<b>1,967,873</b>
\$600,000 under \$1,000,000.....	5,935	104,118	10,378	121,258	11,253	75,460	9,870	147,094
\$1,000,000 under \$2,500,000.....	7,062	234,650	9,718	211,295	10,967	192,441	10,067	494,250
\$2,500,000 under \$5,000,000.....	1,877	138,060	2,384	101,909	2,581	106,515	2,521	314,986
\$5,000,000 under \$10,000,000.....	745	97,402	941	71,342	1,031	79,765	1,022	263,680
\$10,000,000 under \$20,000,000.....	277	71,821	338	47,023	370	57,492	367	227,674
\$20,000,000 or more.....	129	124,385	175	63,681	193	96,654	201	520,189
<b>Nontaxable returns, total.....</b>	<b>4,640</b>	<b>117,829</b>	<b>12,821</b>	<b>179,479</b>	<b>17,437</b>	<b>129,616</b>	<b>22,902</b>	<b>2,579,738</b>
\$600,000 under \$1,000,000.....	3,401	53,997	8,709	89,248	11,433	58,278	13,790	570,749
\$1,000,000 under \$2,500,000.....	919	25,862	3,268	50,961	4,811	39,467	7,104	861,032
\$2,500,000 under \$5,000,000.....	206	14,105	571	20,959	823	13,770	1,434	476,012
\$5,000,000 under \$10,000,000.....	70	7,722	187	8,781	259	9,833	407	407,238
\$10,000,000 under \$20,000,000.....	32	5,592	60	5,430	75	4,308	116	147,934
\$20,000,000 or more.....	12	10,551	26	4,100	35	3,960	52	116,774

Size of gross estate	Type of deductions--Continued						Taxable estate	
	Bequests to surviving spouse		Charitable deduction		Total allowable deductions			
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(57)	(58)	(59)	(60)	(61)	(62)	(63)	(64)
<b>All returns, total.....</b>	<b>27,751</b>	<b>32,075,747</b>	<b>11,230</b>	<b>7,982,106</b>	<b>60,052</b>	<b>47,337,924</b>	<b>56,160</b>	<b>57,493,590</b>
\$600,000 under \$1,000,000.....	13,145	5,067,924	5,221	802,609	31,694	7,244,321	29,393	17,405,464
\$1,000,000 under \$2,500,000.....	10,975	9,332,842	4,004	1,301,836	21,489	12,854,031	20,172	18,782,631
\$2,500,000 under \$5,000,000.....	2,326	5,306,255	1,134	739,576	4,469	7,257,360	4,295	8,063,554
\$5,000,000 under \$10,000,000.....	867	3,991,499	518	721,525	1,608	5,671,437	1,540	5,309,418
\$10,000,000 under \$20,000,000.....	288	2,608,460	207	664,949	529	3,845,577	508	3,285,342
\$20,000,000 or more.....	150	5,768,765	145	3,751,611	263	10,465,197	252	4,647,182
<b>Taxable returns, total.....</b>	<b>3,645</b>	<b>7,360,057</b>	<b>6,090</b>	<b>4,639,602</b>	<b>27,213</b>	<b>16,116,770</b>	<b>27,238</b>	<b>43,422,435</b>
\$600,000 under \$1,000,000.....	545	41,547	1,933	42,026	11,630	589,024	11,659	8,867,209
\$1,000,000 under \$2,500,000.....	1,765	777,790	2,588	277,585	11,244	2,250,591	11,244	14,401,939
\$2,500,000 under \$5,000,000.....	689	998,768	854	227,673	2,667	1,906,230	2,662	7,217,675
\$5,000,000 under \$10,000,000.....	384	1,365,616	409	406,222	1,083	2,292,631	1,083	5,081,984
\$10,000,000 under \$20,000,000.....	160	1,160,275	175	421,388	382	1,989,294	382	3,227,574
\$20,000,000 or more.....	102	3,016,062	131	3,264,707	208	7,089,001	208	4,626,053
<b>Nontaxable returns, total.....</b>	<b>24,106</b>	<b>24,715,690</b>	<b>5,140</b>	<b>3,342,505</b>	<b>32,839</b>	<b>31,221,154</b>	<b>28,922</b>	<b>14,071,155</b>
\$600,000 under \$1,000,000.....	12,600	5,026,377	3,289	760,582	20,065	6,655,297	17,734	8,538,255
\$1,000,000 under \$2,500,000.....	9,210	8,555,052	1,416	1,024,251	10,246	10,603,440	8,928	4,380,692
\$2,500,000 under \$5,000,000.....	1,638	4,307,488	281	511,903	1,802	5,351,130	1,634	845,878
\$5,000,000 under \$10,000,000.....	483	2,625,884	109	315,303	525	3,378,807	457	227,433
\$10,000,000 under \$20,000,000.....	128	1,448,185	31	243,561	147	1,856,283	126	57,768
\$20,000,000 or more.....	48	2,752,703	14	486,904	55	3,376,197	44	21,129

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 2.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Adjusted taxable gifts		Adjusted taxable estate		Tentative estate tax		Gift tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(65)	(66)	(67)	(68)	(69)	(70)	(71)	(72)
<b>All returns, total.....</b>	<b>6,722</b>	<b>1,933,441</b>	<b>56,373</b>	<b>59,428,422</b>	<b>56,364</b>	<b>23,334,017</b>	<b>1,091</b>	<b>309,706</b>
\$600,000 under \$1,000,000.....	1,867	220,267	29,496	17,625,729	29,495	5,733,241	152	11,946
\$1,000,000 under \$2,500,000.....	2,622	508,095	20,220	19,290,725	20,214	6,864,472	332	18,768
\$2,500,000 under \$5,000,000.....	1,159	335,067	4,314	8,398,621	4,312	3,530,863	178	29,342
\$5,000,000 under \$10,000,000.....	632	348,989	1,566	5,658,985	1,566	2,690,348	198	69,037
\$10,000,000 under \$20,000,000.....	268	251,785	515	3,537,942	515	1,832,966	125	76,763
\$20,000,000 or more.....	174	269,238	262	4,916,420	262	2,682,127	105	103,850
<b>Taxable returns, total.....</b>	<b>4,837</b>	<b>1,624,861</b>	<b>27,243</b>	<b>45,047,294</b>	<b>27,243</b>	<b>18,767,104</b>	<b>860</b>	<b>272,580</b>
\$600,000 under \$1,000,000.....	1,255	170,114	11,659	9,037,323	11,659	3,018,177	70	2,414
\$1,000,000 under \$2,500,000.....	1,869	408,085	11,244	14,810,024	11,244	5,439,769	261	16,522
\$2,500,000 under \$5,000,000.....	837	273,899	2,667	7,491,574	2,667	3,239,862	155	24,190
\$5,000,000 under \$10,000,000.....	507	304,974	1,083	5,386,959	1,083	2,602,013	171	63,640
\$10,000,000 under \$20,000,000.....	225	216,456	382	3,444,030	382	1,798,556	113	65,258
\$20,000,000 or more.....	144	251,332	208	4,877,385	208	2,668,727	90	100,556
<b>Nontaxable returns, total.....</b>	<b>1,885</b>	<b>308,580</b>	<b>29,130</b>	<b>14,381,128</b>	<b>29,121</b>	<b>4,566,914</b>	<b>231</b>	<b>37,126</b>
\$600,000 under \$1,000,000.....	612	50,153	17,837	8,588,407	17,836	2,715,064	82	9,532
\$1,000,000 under \$2,500,000.....	753	100,009	8,977	4,480,701	8,971	1,424,703	71	2,246
\$2,500,000 under \$5,000,000.....	322	61,168	1,647	907,046	1,645	291,001	24	5,152
\$5,000,000 under \$10,000,000.....	126	44,015	483	272,026	483	88,335	26	5,397
\$10,000,000 under \$20,000,000.....	43	35,329	133	93,912	133	34,411	12	11,505
\$20,000,000 or more.....	29	17,907	54	39,035	54	13,400	15	3,294

Size of gross estate	Estate tax before credits		Allowable unified credit		State death tax credit		Other tax credits	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(73)	(74)	(75)	(76)	(77)	(78)	(79)	(80)
<b>All returns, total.....</b>	<b>56,322</b>	<b>23,024,308</b>	<b>58,983</b>	<b>11,352,128</b>	<b>31,678</b>	<b>2,704,499</b>	<b>977</b>	<b>95,677</b>
\$600,000 under \$1,000,000.....	29,455	5,721,293	31,081	5,979,971	14,733	267,840	323	8,124
\$1,000,000 under \$2,500,000.....	20,214	6,845,703	21,084	4,059,436	12,243	585,034	458	28,889
\$2,500,000 under \$5,000,000.....	4,312	3,501,521	4,436	854,033	2,962	440,846	104	20,453
\$5,000,000 under \$10,000,000.....	1,566	2,621,311	1,591	306,395	1,124	415,800	52	12,454
\$10,000,000 under \$20,000,000.....	514	1,756,203	528	101,651	400	352,648	24	9,159
\$20,000,000 or more.....	261	2,578,277	263	50,643	215	642,331	14	16,598
<b>Taxable returns, total.....</b>	<b>27,243</b>	<b>18,494,521</b>	<b>27,223</b>	<b>5,246,789</b>	<b>26,414</b>	<b>2,651,002</b>	<b>866</b>	<b>88,956</b>
\$600,000 under \$1,000,000.....	11,659	3,015,762	11,659	2,247,449	11,169	235,253	247	5,257
\$1,000,000 under \$2,500,000.....	11,244	5,423,246	11,226	2,163,816	10,963	569,813	424	25,035
\$2,500,000 under \$5,000,000.....	2,667	3,215,672	2,665	513,449	2,643	436,444	104	20,453
\$5,000,000 under \$10,000,000.....	1,083	2,538,372	1,083	208,488	1,057	414,984	52	12,454
\$10,000,000 under \$20,000,000.....	382	1,733,298	382	73,501	376	352,384	24	9,159
\$20,000,000 or more.....	208	2,568,172	208	40,086	206	642,124	14	16,598
<b>Nontaxable returns, total.....</b>	<b>29,079</b>	<b>4,529,787</b>	<b>31,760</b>	<b>6,105,339</b>	<b>5,264</b>	<b>53,497</b>	<b>111</b>	<b>6,721</b>
\$600,000 under \$1,000,000.....	17,796	2,705,531	19,422	3,732,522	3,564	32,588	76	2,867
\$1,000,000 under \$2,500,000.....	8,971	1,422,457	9,858	1,895,620	1,281	15,221	35	3,854
\$2,500,000 under \$5,000,000.....	1,645	285,849	1,771	340,583	318	4,402	--	--
\$5,000,000 under \$10,000,000.....	483	82,938	508	97,907	67	816	--	--
\$10,000,000 under \$20,000,000.....	132	22,905	146	28,150	24	264	--	--
\$20,000,000 or more.....	53	10,106	55	10,557	9	208	--	--

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 2.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits, by Size of Gross Estate--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of gross estate	Net estate tax		Generation-skipping tax		Community property	
	Number	Amount	Number	Amount	Number	Amount
	(81)	(82)	(83)	(84)	(85)	(86)
<b>All returns, total.....</b>	<b>27,243</b>	<b>10,507,768</b>	<b>289</b>	<b>89,442</b>	<b>7,142</b>	<b>18,753,255</b>
\$600,000 under \$1,000,000.....	11,659	527,801	24	650	3,435	4,472,580
\$1,000,000 under \$2,500,000.....	11,244	2,664,578	38	2,691	2,832	6,569,879
\$2,500,000 under \$5,000,000.....	2,667	2,245,325	114	15,848	582	3,056,286
\$5,000,000 under \$10,000,000.....	1,083	1,902,446	46	11,424	207	2,100,397
\$10,000,000 under \$20,000,000.....	382	1,298,254	40	16,924	62	1,231,035
\$20,000,000 or more.....	208	1,869,364	27	41,904	25	1,323,078
<b>Taxable returns, total.....</b>	<b>27,243</b>	<b>10,507,768</b>	<b>289</b>	<b>89,442</b>	<b>749</b>	<b>3,329,116</b>
\$600,000 under \$1,000,000.....	11,659	527,801	24	650	186	269,253
\$1,000,000 under \$2,500,000.....	11,244	2,664,578	38	2,691	331	587,851
\$2,500,000 under \$5,000,000.....	2,667	2,245,325	114	15,848	122	604,930
\$5,000,000 under \$10,000,000.....	1,083	1,902,446	46	11,424	69	554,571
\$10,000,000 under \$20,000,000.....	382	1,298,254	40	16,924	23	371,199
\$20,000,000 or more.....	208	1,869,364	27	41,904	18	941,312
<b>Nontaxable returns, total.....</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>6,393</b>	<b>15,424,139</b>
\$600,000 under \$1,000,000.....	--	--	--	--	3,249	4,203,326
\$1,000,000 under \$2,500,000.....	--	--	--	--	2,500	5,982,028
\$2,500,000 under \$5,000,000.....	--	--	--	--	460	2,451,356
\$5,000,000 under \$10,000,000.....	--	--	--	--	138	1,545,826
\$10,000,000 under \$20,000,000.....	--	--	--	--	39	859,836
\$20,000,000 or more.....	--	--	--	--	7	381,766

<sup>1</sup> Gross estate and asset values shown at their value at the decedents date-of-death.

Note: Detail may not add to totals because of rounding.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 3.—Estate Tax Returns Filed for 1992 Decedents: Gross Estate, Debts, Net Worth, Type of Property, Charitable Deduction, and Estate Tax, by Size of Net Worth <sup>1</sup>**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of net worth	Gross estate, date-of-death <sup>3</sup>		Debts and mortgages		Net worth <sup>1</sup>	
	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)
<b>All returns, total.....</b>	<b>60,082</b>	<b>104,453,728</b>	<b>46,949</b>	<b>4,547,611</b>	<b>60,082</b>	<b>99,906,116</b>
Under \$600,000 <sup>2</sup> .....	1,985	1,670,180	1,985	910,140	1,985	760,040
\$600,000 under \$1,000,000.....	31,323	24,740,113	23,259	831,753	31,323	23,908,360
\$1,000,000 under \$2,500,000.....	20,351	30,975,408	16,032	1,079,441	20,351	29,895,967
\$2,500,000 under \$5,000,000.....	4,190	14,889,973	3,675	608,837	4,190	14,281,136
\$5,000,000 under \$10,000,000.....	1,494	10,471,819	1,315	312,379	1,494	10,159,440
\$10,000,000 under \$20,000,000.....	490	6,856,738	443	248,080	490	6,608,658
\$20,000,000 or more.....	249	14,849,496	239	556,980	249	14,292,516
<b>Taxable returns, total.....</b>	<b>27,243</b>	<b>59,822,421</b>	<b>24,047</b>	<b>1,967,873</b>	<b>27,243</b>	<b>57,854,547</b>
Under \$600,000 <sup>2</sup> .....	10	7,216	10	1,425	10	5,790
\$600,000 under \$1,000,000.....	12,162	10,060,254	10,372	281,295	12,162	9,778,959
\$1,000,000 under \$2,500,000.....	10,918	16,702,723	9,741	532,172	10,918	16,170,551
\$2,500,000 under \$5,000,000.....	2,564	9,133,130	2,418	331,929	2,564	8,801,201
\$5,000,000 under \$10,000,000.....	1,030	7,261,990	968	180,492	1,030	7,081,498
\$10,000,000 under \$20,000,000.....	360	5,094,648	345	177,096	360	4,917,552
\$20,000,000 or more.....	199	11,562,460	192	463,465	199	11,098,995
<b>Nontaxable returns, total.....</b>	<b>32,839</b>	<b>44,631,307</b>	<b>22,902</b>	<b>2,579,738</b>	<b>32,839</b>	<b>42,051,569</b>
Under \$600,000 <sup>2</sup> .....	1,975	1,662,965	1,975	908,715	1,975	754,250
\$600,000 under \$1,000,000.....	19,161	14,679,858	12,886	550,458	19,161	14,129,400
\$1,000,000 under \$2,500,000.....	9,433	14,272,685	6,292	547,269	9,433	13,725,416
\$2,500,000 under \$5,000,000.....	1,625	5,756,843	1,257	276,908	1,625	5,479,935
\$5,000,000 under \$10,000,000.....	464	3,209,829	347	131,887	464	3,077,942
\$10,000,000 under \$20,000,000.....	130	1,762,090	98	70,984	130	1,691,106
\$20,000,000 or more.....	50	3,287,036	47	93,516	50	3,193,520

Size of net worth	Type of property							
	Personal residence		Real estate		Real estate partnerships		Closely held stock	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
<b>All returns, total.....</b>	<b>36,389</b>	<b>7,454,466</b>	<b>32,752</b>	<b>12,873,806</b>	<b>3,194</b>	<b>809,709</b>	<b>7,643</b>	<b>8,108,778</b>
Under \$600,000 <sup>2</sup> .....	1,440	313,903	1,409	517,639	88	28,682	305	47,797
\$600,000 under \$1,000,000.....	17,998	2,716,680	15,698	3,432,336	1,109	90,567	2,332	514,010
\$1,000,000 under \$2,500,000.....	12,727	2,622,371	11,503	4,521,427	1,273	150,825	3,188	1,213,177
\$2,500,000 under \$5,000,000.....	2,723	868,840	2,618	1,931,539	437	127,964	1,042	863,866
\$5,000,000 under \$10,000,000.....	990	497,089	994	1,126,574	171	103,772	459	943,022
\$10,000,000 under \$20,000,000.....	336	216,893	345	695,696	67	74,175	192	752,938
\$20,000,000 or more.....	176	218,689	186	648,597	47	233,725	126	3,773,969
<b>Taxable returns, total.....</b>	<b>14,948</b>	<b>3,562,520</b>	<b>13,653</b>	<b>6,068,368</b>	<b>1,375</b>	<b>385,845</b>	<b>2,638</b>	<b>3,797,543</b>
Under \$600,000 <sup>2</sup> .....	**6,316	**1,054,256	10	1,768	--	--	--	--
\$600,000 under \$1,000,000.....	--	--	5,552	1,281,440	388	31,836	478	122,166
\$1,000,000 under \$2,500,000.....	5,969	1,312,131	5,580	2,122,320	556	41,887	1,181	446,389
\$2,500,000 under \$5,000,000.....	1,619	530,535	1,484	1,096,352	260	53,663	494	396,538
\$5,000,000 under \$10,000,000.....	655	332,640	628	631,199	88	39,814	261	474,933
\$10,000,000 under \$20,000,000.....	246	152,392	248	382,222	47	42,801	131	524,393
\$20,000,000 or more.....	142	180,565	149	553,066	37	175,844	92	1,833,124
<b>Nontaxable returns, total.....</b>	<b>21,442</b>	<b>3,891,945</b>	<b>19,099</b>	<b>6,805,439</b>	<b>1,819</b>	<b>423,864</b>	<b>5,005</b>	<b>4,311,235</b>
Under \$600,000 <sup>2</sup> .....	**13,123	**1,976,327	1,399	515,870	88	28,682	305	47,797
\$600,000 under \$1,000,000.....	--	--	10,146	2,150,896	722	58,731	1,854	391,843
\$1,000,000 under \$2,500,000.....	6,758	1,310,240	5,922	2,399,107	717	108,937	2,007	766,787
\$2,500,000 under \$5,000,000.....	1,104	338,305	1,133	835,187	178	74,301	548	467,329
\$5,000,000 under \$10,000,000.....	334	164,449	366	495,375	83	63,958	198	468,089
\$10,000,000 under \$20,000,000.....	89	64,500	96	313,473	20	31,373	61	228,545
\$20,000,000 or more.....	33	38,124	37	95,531	10	57,881	33	1,940,845

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 3.—Estate Tax Returns Filed for 1992 Decedents: Gross Estate, Debts, Net Worth, Type of Property, Charitable Deduction, and Estate Tax, by Size of Net Worth<sup>1</sup>—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Size of net worth	Type of property—Continued							
	Other stock		State and local bonds		Federal savings bonds		Other Federal bonds	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)
<b>All returns, total.....</b>	<b>46,592</b>	<b>24,370,660</b>	<b>33,047</b>	<b>13,015,873</b>	<b>9,117</b>	<b>454,395</b>	<b>20,375</b>	<b>4,603,842</b>
Under \$600,000 <sup>2</sup> .....	1,066	108,395	424	27,893	109	2,331	360	19,766
\$600,000 under \$1,000,000.....	23,228	4,469,988	14,725	2,346,741	5,254	237,429	10,200	996,835
\$1,000,000 under \$2,500,000.....	16,582	6,491,776	13,090	4,125,243	3,004	166,602	7,067	1,205,059
\$2,500,000 under \$5,000,000.....	3,694	3,957,892	3,070	2,333,624	520	31,375	1,685	630,039
\$5,000,000 under \$10,000,000.....	1,332	3,071,215	1,153	1,736,152	166	13,347	657	458,067
\$10,000,000 under \$20,000,000.....	453	2,109,276	391	1,054,105	45	1,716	253	343,953
\$20,000,000 or more.....	236	4,162,118	194	1,392,114	19	1,594	153	950,122
<b>Taxable returns, total.....</b>	<b>22,387</b>	<b>16,885,742</b>	<b>16,897</b>	<b>8,677,495</b>	<b>4,327</b>	<b>246,531</b>	<b>10,187</b>	<b>3,147,500</b>
Under \$600,000 <sup>2</sup> .....	**9,453	**2,182,586	--	--	--	--	8	126
\$600,000 under \$1,000,000.....	**	**	6,150	1,063,759	2,069	105,579	4,028	440,897
\$1,000,000 under \$2,500,000.....	9,174	4,160,074	7,457	2,531,854	1,742	105,789	4,213	758,336
\$2,500,000 under \$5,000,000.....	2,290	2,696,466	1,996	1,626,759	340	22,210	1,123	448,572
\$5,000,000 under \$10,000,000.....	941	2,433,701	835	1,356,501	126	10,914	491	374,677
\$10,000,000 under \$20,000,000.....	337	1,721,093	297	870,494	36	1,288	196	272,849
\$20,000,000 or more.....	191	3,691,821	162	1,228,128	14	751	127	852,043
<b>Nontaxable returns, total.....</b>	<b>24,206</b>	<b>7,484,917</b>	<b>16,151</b>	<b>4,338,378</b>	<b>4,791</b>	<b>207,864</b>	<b>10,188</b>	<b>1,456,341</b>
Under \$600,000 <sup>2</sup> .....	**14,841	**2,395,797	424	27,893	109	2,331	351	19,640
\$600,000 under \$1,000,000.....	**	**	8,575	1,282,982	3,186	131,850	6,172	555,938
\$1,000,000 under \$2,500,000.....	7,408	2,331,702	5,634	1,593,389	1,262	60,813	2,854	446,722
\$2,500,000 under \$5,000,000.....	1,404	1,261,425	1,074	706,865	180	9,166	562	181,467
\$5,000,000 under \$10,000,000.....	391	637,514	318	379,652	40	2,433	166	83,390
\$10,000,000 under \$20,000,000.....	117	388,183	94	183,611	9	428	57	71,104
\$20,000,000 or more.....	45	470,296	31	163,986	5	843	25	98,079

Size of net worth	Type of property—Continued							
	Corporate and foreign bonds		Bond funds		Unclassifiable mutual funds		Cash	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)
<b>All returns, total.....</b>	<b>14,390</b>	<b>938,327</b>	<b>4,987</b>	<b>309,062</b>	<b>13,277</b>	<b>1,135,304</b>	<b>59,377</b>	<b>12,072,825</b>
Under \$600,000 <sup>2</sup> .....	203	5,412	109	1,053	252	4,804	1,886	122,913
\$600,000 under \$1,000,000.....	7,157	292,756	2,416	111,584	6,489	418,998	30,944	4,673,000
\$1,000,000 under \$2,500,000.....	5,046	232,274	1,839	113,651	4,943	329,494	20,176	4,166,710
\$2,500,000 under \$5,000,000.....	1,265	107,715	433	45,879	1,050	180,372	4,152	1,243,598
\$5,000,000 under \$10,000,000.....	452	65,423	132	19,908	373	84,840	1,481	804,004
\$10,000,000 under \$20,000,000.....	162	64,208	38	6,688	111	57,151	488	489,129
\$20,000,000 or more.....	105	170,538	20	10,299	59	59,647	249	573,471
<b>Taxable returns, total.....</b>	<b>7,314</b>	<b>600,644</b>	<b>2,529</b>	<b>204,076</b>	<b>6,342</b>	<b>666,279</b>	<b>27,084</b>	<b>7,214,767</b>
Under \$600,000 <sup>2</sup> .....	8	1,099	--	--	--	--	10	2,365
\$600,000 under \$1,000,000.....	2,991	112,973	1,064	65,409	2,640	174,316	12,058	2,171,439
\$1,000,000 under \$2,500,000.....	2,996	160,601	1,031	71,658	2,696	213,777	10,882	2,702,511
\$2,500,000 under \$5,000,000.....	793	73,143	297	37,034	625	121,594	2,550	838,444
\$5,000,000 under \$10,000,000.....	320	42,142	92	16,139	255	60,307	1,024	599,260
\$10,000,000 under \$20,000,000.....	120	49,713	29	6,142	80	38,623	360	387,165
\$20,000,000 or more.....	86	160,974	15	7,694	46	57,661	199	513,583
<b>Nontaxable returns, total.....</b>	<b>7,076</b>	<b>337,682</b>	<b>2,458</b>	<b>104,986</b>	<b>6,936</b>	<b>469,026</b>	<b>32,293</b>	<b>4,858,057</b>
Under \$600,000 <sup>2</sup> .....	195	4,313	109	1,053	252	4,804	1,876	120,547
\$600,000 under \$1,000,000.....	4,165	179,783	1,352	46,175	3,848	244,682	18,885	2,501,561
\$1,000,000 under \$2,500,000.....	2,050	71,673	807	41,993	2,247	115,717	9,294	1,464,200
\$2,500,000 under \$5,000,000.....	472	34,573	136	8,845	425	58,778	1,602	405,154
\$5,000,000 under \$10,000,000.....	133	23,281	40	3,768	119	24,532	457	204,744
\$10,000,000 under \$20,000,000.....	42	14,495	9	546	30	18,527	128	101,963
\$20,000,000 or more.....	19	9,564	5	2,605	13	1,985	50	59,888

Footnotes at end of table.



# Federal Taxation of Wealth Transfers, 1992-1995

**Table 3.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate, Debts, Net Worth, Type of Property, Charitable Deduction, and Estate Tax, by Size of Net Worth<sup>1</sup>--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of net worth	Type of property--Continued							
	Life insurance <sup>4</sup>		Farm assets		Limited partnerships		Other noncorporate businesses	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)
<b>All returns, total.....</b>	<b>33,143</b>	<b>3,548,330</b>	<b>4,230</b>	<b>859,170</b>	<b>7,468</b>	<b>992,989</b>	<b>8,689</b>	<b>1,929,443</b>
Under \$600,000 <sup>2</sup> .....	1,342	179,598	211	33,672	285	8,485	273	19,806
\$600,000 under \$1,000,000.....	17,094	1,164,017	2,384	153,276	2,756	107,966	3,043	170,470
\$1,000,000 under \$2,500,000.....	11,315	1,397,651	1,228	115,282	2,747	161,261	3,451	417,252
\$2,500,000 under \$5,000,000.....	2,227	462,948	254	68,664	1,011	130,089	1,165	293,342
\$5,000,000 under \$10,000,000.....	758	199,886	92	23,857	408	136,078	459	218,415
\$10,000,000 under \$20,000,000.....	267	76,371	36	11,798	168	78,814	176	156,619
\$20,000,000 or more.....	138	67,860	24	452,621	94	370,296	121	653,539
<b>Taxable returns, total.....</b>	<b>12,321</b>	<b>971,360</b>	<b>1,987</b>	<b>629,918</b>	<b>3,219</b>	<b>630,323</b>	<b>3,535</b>	<b>1,089,762</b>
Under \$600,000 <sup>2</sup> .....	10	687	--	--	8	247	--	--
\$600,000 under \$1,000,000.....	5,499	258,407	1,084	76,510	955	27,979	900	31,430
\$1,000,000 under \$2,500,000.....	4,939	372,648	631	41,461	1,270	57,860	1,521	175,912
\$2,500,000 under \$5,000,000.....	1,122	160,863	166	37,573	545	82,759	613	136,361
\$5,000,000 under \$10,000,000.....	455	88,778	60	17,237	250	73,630	282	129,666
\$10,000,000 under \$20,000,000.....	186	34,229	24	4,899	114	43,410	121	92,499
\$20,000,000 or more.....	109	55,748	21	452,239	77	344,438	98	523,893
<b>Nontaxable returns, total.....</b>	<b>20,822</b>	<b>2,576,971</b>	<b>2,243</b>	<b>229,252</b>	<b>4,248</b>	<b>362,666</b>	<b>5,154</b>	<b>839,682</b>
Under \$600,000 <sup>2</sup> .....	1,332	178,911	211	33,672	277	8,237	273	19,806
\$600,000 under \$1,000,000.....	11,596	905,610	1,300	76,766	1,801	79,987	2,144	139,040
\$1,000,000 under \$2,500,000.....	6,376	1,025,003	597	73,821	1,477	103,401	1,930	241,339
\$2,500,000 under \$5,000,000.....	1,106	302,085	88	31,091	466	47,330	552	156,981
\$5,000,000 under \$10,000,000.....	303	111,109	32	6,620	158	62,448	177	88,750
\$10,000,000 under \$20,000,000.....	81	42,141	12	6,899	54	35,404	55	64,120
\$20,000,000 or more.....	28	12,112	3	382	17	25,858	23	129,647

Size of net worth	Type of property--Continued							
	Mortgages and notes		Annuities		Depletables/intangibles		Art	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(39)	(40)	(41)	(42)	(43)	(44)	(45)	(46)
<b>All returns, total.....</b>	<b>18,294</b>	<b>2,674,355</b>	<b>24,558</b>	<b>4,674,334</b>	<b>4,579</b>	<b>387,827</b>	<b>1,402</b>	<b>436,406</b>
Under \$600,000 <sup>2</sup> .....	607	63,119	946	112,178	142	2,030	38	1,548
\$600,000 under \$1,000,000.....	8,513	717,774	12,354	1,451,566	2,054	80,827	457	8,235
\$1,000,000 under \$2,500,000.....	6,360	787,455	8,704	1,839,219	1,559	98,719	422	27,528
\$2,500,000 under \$5,000,000.....	1,716	407,998	1,685	692,533	447	49,615	229	37,541
\$5,000,000 under \$10,000,000.....	685	266,007	579	353,117	230	31,697	136	49,374
\$10,000,000 under \$20,000,000.....	255	156,049	186	132,575	86	67,744	59	69,250
\$20,000,000 or more.....	158	275,953	102	93,146	61	57,195	60	242,930
<b>Taxable returns, total.....</b>	<b>8,101</b>	<b>1,357,914</b>	<b>8,232</b>	<b>1,492,597</b>	<b>2,230</b>	<b>201,126</b>	<b>716</b>	<b>280,125</b>
Under \$600,000 <sup>2</sup> .....	**3,196	**254,968	9	326	--	--	--	--
\$600,000 under \$1,000,000.....	--	--	3,654	383,256	836	29,713	196	2,169
\$1,000,000 under \$2,500,000.....	3,180	408,302	3,324	532,114	806	40,965	174	8,494
\$2,500,000 under \$5,000,000.....	977	216,702	729	234,191	309	29,547	155	19,511
\$5,000,000 under \$10,000,000.....	435	149,982	322	187,608	159	25,202	99	23,017
\$10,000,000 under \$20,000,000.....	185	89,949	117	91,854	68	39,031	45	41,472
\$20,000,000 or more.....	127	238,013	77	63,248	51	36,667	47	185,463
<b>Nontaxable returns, total.....</b>	<b>10,193</b>	<b>1,316,441</b>	<b>16,326</b>	<b>3,181,736</b>	<b>2,349</b>	<b>186,701</b>	<b>686</b>	<b>156,281</b>
Under \$600,000 <sup>2</sup> .....	**5,924	**525,925	937	111,851	142	2,030	38	1,548
\$600,000 under \$1,000,000.....	--	--	8,700	1,068,310	1,218	51,114	261	6,066
\$1,000,000 under \$2,500,000.....	3,180	379,153	5,380	1,307,105	753	57,754	248	19,034
\$2,500,000 under \$5,000,000.....	739	191,296	956	458,342	138	20,067	73	18,031
\$5,000,000 under \$10,000,000.....	249	116,025	258	165,509	70	6,495	37	26,357
\$10,000,000 under \$20,000,000.....	70	66,100	69	40,721	18	28,714	14	27,778
\$20,000,000 or more.....	30	37,940	25	29,898	10	20,528	13	57,467

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 3.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate, Debts, Net Worth, Type of Property, Charitable Deduction, and Estate Tax, by Size of Net Worth<sup>1</sup>--Continued**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Size of net worth	Type of property--Continued		Charitable deduction		Estate tax before credits		Net estate tax	
	Other assets							
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(47)	(48)	(49)	(50)	(51)	(52)	(53)	(54)
All returns, total.....	54,275	2,803,855	11,230	7,982,106	56,322	23,024,308	27,243	10,507,768
Under \$600,000 <sup>2</sup> .....	1,792	49,160	174	14,467	1,695	233,751	10	681
\$600,000 under \$1,000,000.....	27,605	585,070	5,156	814,934	29,121	5,761,189	12,162	564,609
\$1,000,000 under \$2,500,000.....	18,765	792,443	3,956	1,291,507	19,251	6,730,655	10,918	2,699,947
\$2,500,000 under \$5,000,000.....	3,968	424,542	1,101	740,106	4,064	3,461,911	2,564	2,248,086
\$5,000,000 under \$10,000,000.....	1,425	269,975	504	730,509	1,465	2,590,022	1,030	1,888,712
\$10,000,000 under \$20,000,000.....	474	241,591	198	677,947	479	1,700,866	360	1,259,906
\$20,000,000 or more.....	246	441,073	140	3,712,636	247	2,545,915	199	1,845,827
Taxable returns, total.....	24,458	1,711,990	6,090	4,639,602	27,243	18,494,521	27,243	10,507,768
Under \$600,000 <sup>2</sup> .....	9	130	--	--	10	2,737	10	681
\$600,000 under \$1,000,000.....	10,315	189,633	1,992	43,393	12,162	3,161,045	12,162	564,609
\$1,000,000 under \$2,500,000.....	10,162	437,644	2,578	284,224	10,918	5,398,904	10,918	2,699,947
\$2,500,000 under \$5,000,000.....	2,434	274,315	826	235,169	2,564	3,200,385	2,564	2,248,086
\$5,000,000 under \$10,000,000.....	989	194,643	399	396,937	1,030	2,514,579	1,030	1,888,712
\$10,000,000 under \$20,000,000.....	350	208,127	168	454,136	360	1,680,084	360	1,259,906
\$20,000,000 or more.....	198	407,498	127	3,225,744	199	2,536,787	199	1,845,827
Nontaxable returns, total.....	29,817	1,091,865	5,140	3,342,505	29,079	4,529,787	--	--
Under \$600,000 <sup>2</sup> .....	1,783	49,029	174	14,467	1,685	231,015	--	--
\$600,000 under \$1,000,000.....	17,290	395,437	3,164	771,541	16,959	2,600,144	--	--
\$1,000,000 under \$2,500,000.....	8,603	354,799	1,379	1,007,283	8,333	1,331,751	--	--
\$2,500,000 under \$5,000,000.....	1,533	150,227	276	504,938	1,500	261,526	--	--
\$5,000,000 under \$10,000,000.....	435	75,332	105	333,572	435	75,442	--	--
\$10,000,000 under \$20,000,000.....	125	33,464	29	223,812	120	20,781	--	--
\$20,000,000 or more.....	48	33,575	13	486,892	48	9,128	--	--

<sup>1</sup> Net worth is calculated as "total gross estate" less "debts and mortgages." Negative values of net worth were constrained to zero.

<sup>2</sup> Includes estates with negative net worth.

<sup>3</sup> Gross estate and asset values shown at their value on the decedent's date-of-death.

<sup>4</sup> Life insurance is shown net of any outstanding policy loans and associated interest and penalties.

\*\* Data deleted or combined to prevent disclosure of individual taxpayer data.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 4.—Estate Tax Returns Filed for 1992 Decedents Making Charitable Bequests: Net Worth, Charitable Bequests, and Recipients of Charitable Bequests, by Sex and Marital Status of Decedent <sup>1</sup>**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Sex, marital status	Net worth <sup>1</sup>		Gross charitable bequests		Type of recipient			
					Arts and humanities		Religious	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All decedents</b>								
Total.....	11,236	29,462,299	11,236	8,473,542	1,149	259,619	6,843	810,747
Married.....	2,211	9,252,779	2,211	1,209,248	171	27,897	1,133	79,290
Widow or widower.....	6,474	14,617,155	6,474	4,674,014	587	125,539	4,232	477,007
Single.....	1,979	3,155,237	1,979	1,313,213	323	71,606	1,179	233,193
Other <sup>2</sup> .....	572	2,437,128	572	1,277,067	68	34,577	298	21,256
<b>Female decedents</b>								
Total.....	6,581	13,309,029	6,581	3,948,271	740	104,649	4,194	565,489
Married.....	531	1,427,154	531	153,030	59	1,375	248	29,452
Widow or widower.....	4,708	9,768,598	4,708	3,027,623	455	59,161	3,128	372,780
Single.....	1,048	1,450,965	1,048	621,778	176	29,795	634	153,307
Other <sup>2</sup> .....	293	662,312	293	145,840	51	14,319	183	9,950
<b>Male decedents</b>								
Total.....	4,655	16,153,271	4,655	4,525,272	409	154,970	2,649	245,257
Married.....	1,680	7,825,625	1,680	1,056,219	113	26,523	885	49,838
Widow or widower.....	1,765	4,848,557	1,765	1,646,391	132	66,378	1,104	104,227
Single.....	931	1,704,272	931	691,435	147	41,811	545	79,886
Other <sup>2</sup> .....	279	1,774,816	279	1,131,228	17	20,259	115	11,306
<b>Type of recipient—Continued</b>								
Sex, marital status	Educational, medical, and science <sup>1</sup>		Social welfare		Private foundations		Other	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>All decedents</b>								
Total.....	5,955	2,334,347	602	100,949	325	2,442,683	5,023	2,525,197
Married.....	1,044	200,393	65	10,750	107	476,567	873	414,351
Widow or widower.....	3,603	1,484,761	394	71,531	135	1,366,863	3,033	1,148,313
Single.....	1,020	461,443	135	18,620	48	194,114	916	334,237
Other <sup>2</sup> .....	287	187,750	8	47	35	405,139	201	628,297
<b>Female decedents</b>								
Total.....	3,473	1,362,919	300	58,158	140	739,042	3,071	1,118,013
Married.....	223	30,163	33	592	11	31,157	272	60,291
Widow or widower.....	2,610	1,080,421	259	57,495	86	638,765	2,192	819,001
Single.....	497	194,293	**9	**70	18	43,429	**606	**238,721
Other <sup>2</sup> .....	141	58,043	**	**	25	25,692	**	**
<b>Male decedents</b>								
Total.....	2,482	971,428	302	42,791	185	1,703,641	1,952	1,407,184
Married.....	820	170,230	32	10,158	96	445,410	601	354,060
Widow or widower.....	993	404,340	136	14,036	49	728,098	840	329,312
Single.....	523	267,150	**134	**18,598	30	150,685	**511	**723,812
Other <sup>2</sup> .....	146	129,708	**	**	10	379,447	**	**

<sup>1</sup> Net worth is calculated as "total gross estate" less "debts and mortgages." Negative values of net worth were constrained to zero.

<sup>2</sup> "Other" includes legally separated, divorced, and marital status unknown.

\*\*Data deleted or combined to prevent disclosure of individual taxpayer data.

Note: Detail may not add to totals because of rounding.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 5.--Estate Tax Returns Filed for 1992 Decedents: Gross Estate, Deductions, and Estate Tax, by State of Residence**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

State of residence	Number of returns	Gross estate, tax purposes <sup>1</sup>	Total allowable deductions		State death tax credit		Net estate tax	
			Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>Total.....</b>	<b>60,082</b>	<b>104,155,224</b>	<b>60,052</b>	<b>47,337,924</b>	<b>31,678</b>	<b>2,704,499</b>	<b>27,243</b>	<b>10,507,768</b>
Alabama.....	537	956,476	537	366,919	291	30,980	244	125,091
Arizona.....	934	1,413,637	934	507,608	458	42,574	461	164,322
Arkansas.....	277	2,040,007	277	1,785,953	142	9,616	139	41,940
California.....	10,048	16,406,167	10,027	7,149,092	4,568	376,064	4,332	1,514,679
Colorado.....	631	1,019,199	631	466,651	333	22,359	293	96,592
Connecticut.....	1,086	2,256,927	1,086	941,963	681	89,105	507	307,797
Delaware.....	176	268,122	176	127,781	109	6,364	66	23,107
District of Columbia.....	222	699,561	222	288,384	146	37,194	114	119,097
Florida.....	5,423	10,165,009	5,423	4,605,505	2,796	275,252	2,593	1,136,966
Georgia.....	1,318	2,051,880	1,318	789,211	806	57,758	760	226,590
Hawaii.....	415	1,183,039	415	760,616	184	18,807	185	77,636
Idaho.....	181	236,484	181	98,901	62	2,825	62	10,893
Illinois.....	3,149	5,549,716	3,141	2,781,546	1,697	144,855	1,616	579,602
Indiana.....	878	1,337,971	878	586,591	506	34,679	398	128,675
Iowa.....	833	861,061	833	336,030	472	12,912	346	45,790
Kansas.....	529	856,598	529	367,451	294	24,603	206	91,156
Kentucky.....	474	713,517	474	313,838	263	21,489	213	83,789
Louisiana.....	588	999,501	588	460,620	370	26,429	302	98,795
Maine.....	280	370,423	280	172,908	123	6,674	117	30,102
Maryland.....	1,136	1,919,569	1,136	763,648	682	58,562	495	225,941
Massachusetts.....	1,648	2,699,380	1,648	1,283,627	967	64,420	680	249,168
Michigan.....	1,311	1,928,824	1,311	917,246	711	40,366	472	146,417
Minnesota.....	805	1,188,922	805	524,138	335	29,688	304	115,749
Mississippi.....	228	388,707	228	215,909	108	5,431	94	19,982
Missouri.....	1,089	1,853,717	1,089	853,352	546	49,563	530	190,926
Montana.....	324	350,052	324	112,937	153	5,955	108	25,747
Nebraska.....	510	717,673	510	234,321	270	22,411	236	81,243
Nevada.....	308	627,465	308	300,004	145	22,093	97	75,739
New Hampshire.....	239	372,282	239	152,127	117	9,479	87	36,184
New Jersey.....	2,313	3,619,824	2,313	1,680,694	1,152	72,175	1,105	301,388
New Mexico.....	240	381,542	240	155,045	112	12,354	85	44,171
New York.....	5,111	10,953,467	5,111	5,299,549	2,903	342,615	2,252	1,253,546
North Carolina.....	1,276	2,010,534	1,276	865,385	601	43,691	532	192,518
North Dakota.....	262	267,269	262	121,107	82	3,746	82	12,582
Ohio.....	2,433	4,180,671	2,433	1,967,759	1,407	104,795	1,091	396,070
Oklahoma.....	557	916,864	557	464,951	328	15,144	254	61,712
Oregon.....	556	1,281,718	556	633,424	282	41,091	237	137,977
Pennsylvania.....	2,506	4,020,600	2,506	1,442,783	1,820	134,172	1,239	495,721
Rhode Island.....	236	359,856	236	127,611	138	9,826	114	42,722
South Carolina.....	679	1,049,668	679	545,883	271	17,752	243	74,545
South Dakota.....	182	208,956	182	65,597	123	3,794	113	16,104
Tennessee.....	939	1,370,905	939	511,823	500	33,359	463	135,519
Texas.....	3,112	5,385,781	3,112	2,236,761	1,685	153,477	1,590	633,575
Utah.....	155	236,294	155	103,383	70	5,981	84	18,376
Virginia.....	1,330	2,114,062	1,330	896,200	705	50,844	672	212,440
Washington.....	1,083	1,501,597	1,083	606,996	449	32,214	427	127,508
West Virginia.....	322	543,094	322	174,001	136	27,995	131	87,580
Wisconsin.....	871	1,243,996	871	521,403	482	25,908	381	96,670
Wyoming.....	72	128,222	72	49,975	21	3,156	20	15,589
Other areas <sup>2</sup> .....	181	354,567	181	209,756	34	1,646	30	18,010

<sup>1</sup> Gross estate is shown at the value used to determine estate tax liability. The value could be determined as of date-of-death or six months thereafter (i.e. alternate valuation method).

<sup>2</sup> Includes Alaska, U.S. territories, and U.S. citizens domiciled abroad.

Note: Detail may not add to totals because of rounding.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 6.--Estate Tax Returns Filed for 1992 Female Decedents: Gross Estate and Estate Tax, by Age and Marital Status of Decedent and Size of Gross Estate**

[All figures are estimates based on samples--money amounts are in thousands of dollars]

Marital status, size of gross estate	Total				Age of decedent			
					Under 50 years			
	Gross estate, tax purposes <sup>1</sup>		Net estate tax		Gross estate, tax purposes <sup>1</sup>		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All decedents, total.....</b>	<b>26,115</b>	<b>40,014,049</b>	<b>15,641</b>	<b>5,779,803</b>	<b>414</b>	<b>609,547</b>	<b>132</b>	<b>41,975</b>
\$600,000 under \$1,000,000.....	14,875	11,344,375	7,362	349,950	212	166,620	45	1,509
\$1,000,000 or more.....	11,239	28,669,674	8,278	5,429,853	202	442,927	87	40,466
<b>Married decedents, total.....</b>	<b>6,247</b>	<b>9,739,029</b>	<b>1,185</b>	<b>468,646</b>	<b>246</b>	<b>381,498</b>	<b>17</b>	<b>13,119</b>
\$600,000 under \$1,000,000.....	3,259	2,525,013	379	11,431	127	101,271	4	108
\$1,000,000 or more.....	2,988	7,214,015	806	457,215	119	280,227	13	13,011
<b>Widowed decedents, total.....</b>	<b>16,063</b>	<b>25,343,236</b>	<b>11,766</b>	<b>4,693,568</b>	<b>37</b>	<b>49,074</b>	<b>26</b>	<b>5,579</b>
\$600,000 under \$1,000,000.....	9,227	6,978,627	5,457	274,229	21	16,003	11	473
\$1,000,000 or more.....	6,837	18,364,609	6,310	4,419,339	16	33,071	14	5,106
<b>Single decedents, total.....</b>	<b>2,503</b>	<b>2,950,519</b>	<b>1,596</b>	<b>283,153</b>	<b>63</b>	<b>85,358</b>	<b>44</b>	<b>10,921</b>
\$600,000 under \$1,000,000.....	1,631	1,250,483	952	41,286	33	25,679	17	608
\$1,000,000 or more.....	872	1,700,036	644	241,868	30	59,678	27	10,313
<b>Other decedents, total <sup>2</sup>.....</b>	<b>1,302</b>	<b>1,981,265</b>	<b>1,094</b>	<b>334,436</b>	<b>68</b>	<b>93,617</b>	<b>46</b>	<b>12,355</b>
\$600,000 under \$1,000,000.....	759	590,252	574	23,004	31	23,667	12	319
\$1,000,000 or more.....	543	1,391,013	520	311,432	37	69,950	34	12,036

Marital status, size of gross estate	Age of decedent--Continued							
	50 under 60 years				60 under 70 years			
	Gross estate, tax purposes <sup>1</sup>		Net estate tax		Gross estate, tax purposes <sup>1</sup>		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>All decedents, total.....</b>	<b>953</b>	<b>1,485,804</b>	<b>307</b>	<b>88,977</b>	<b>3,000</b>	<b>4,707,891</b>	<b>1,241</b>	<b>484,158</b>
\$600,000 under \$1,000,000.....	524	404,301	135	5,293	1,628	1,260,566	551	26,892
\$1,000,000 or more.....	429	1,081,503	173	83,684	1,372	3,447,325	690	457,267
<b>Married decedents, total.....</b>	<b>558</b>	<b>953,745</b>	<b>51</b>	<b>15,215</b>	<b>1,613</b>	<b>2,530,085</b>	<b>151</b>	<b>86,862</b>
\$600,000 under \$1,000,000.....	281	215,469	5	82	827	628,602	27	659
\$1,000,000 or more.....	277	738,276	47	15,133	787	1,901,484	124	86,202
<b>Widowed decedents, total.....</b>	<b>162</b>	<b>244,021</b>	<b>120</b>	<b>44,437</b>	<b>956</b>	<b>1,456,102</b>	<b>770</b>	<b>264,000</b>
\$600,000 under \$1,000,000.....	96	75,933	58	2,896	556	441,850	381	20,191
\$1,000,000 or more.....	66	168,088	61	41,541	400	1,014,253	389	243,809
<b>Single decedents, total.....</b>	<b>94</b>	<b>100,947</b>	<b>35</b>	<b>9,057</b>	<b>142</b>	<b>174,968</b>	<b>78</b>	<b>20,497</b>
\$600,000 under \$1,000,000.....	70	51,359	19	640	90	68,514	32	1,511
\$1,000,000 or more.....	24	49,588	16	8,417	52	106,453	46	18,986
<b>Other decedents, total <sup>2</sup>.....</b>	<b>139</b>	<b>187,091</b>	<b>101</b>	<b>20,268</b>	<b>289</b>	<b>546,735</b>	<b>242</b>	<b>112,800</b>
\$600,000 under \$1,000,000.....	77	61,540	53	1,676	156	121,600	111	4,530
\$1,000,000 or more.....	62	125,551	48	18,592	134	425,135	132	108,269

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 6.—Estate Tax Returns Filed for 1992 Female Decedents: Gross Estate and Estate Tax, by Age and Marital Status of Decedent and Size of Gross Estate—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Marital status, size of gross estate	Age of decedent—Continued							
	70 under 80 years				80 years and over			
	Gross estate, tax purposes <sup>1</sup>		Net estate tax		Gross estate, tax purposes <sup>1</sup>		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
<b>All decedents, total.....</b>	<b>5,995</b>	<b>8,733,683</b>	<b>3,507</b>	<b>1,095,494</b>	<b>15,752</b>	<b>24,477,124</b>	<b>10,454</b>	<b>4,069,199</b>
\$600,000 under \$1,000,000.....	3,240	2,487,920	1,568	75,314	9,271	7,024,968	5,064	240,943
\$1,000,000 or more.....	2,755	6,245,763	1,938	1,020,180	6,482	17,452,156	5,390	3,828,256
<b>Married decedents, total.....</b>	<b>2,130</b>	<b>3,198,373</b>	<b>510</b>	<b>155,328</b>	<b>1,700</b>	<b>2,675,327</b>	<b>455</b>	<b>198,121</b>
\$600,000 under \$1,000,000.....	1,114	858,567	205	7,833	910	721,105	138	2,748
\$1,000,000 or more.....	1,016	2,339,806	305	147,495	790	1,954,222	318	195,373
<b>Widowed decedents, total.....</b>	<b>3,084</b>	<b>4,521,634</b>	<b>2,416</b>	<b>805,340</b>	<b>11,825</b>	<b>19,072,404</b>	<b>8,435</b>	<b>3,574,211</b>
\$600,000 under \$1,000,000.....	1,644	1,254,863	1,042	52,067	6,911	5,189,978	3,964	198,602
\$1,000,000 or more.....	1,440	3,266,771	1,374	753,273	4,914	13,882,426	4,471	3,375,610
<b>Single decedents, total.....</b>	<b>483</b>	<b>563,554</b>	<b>314</b>	<b>61,987</b>	<b>1,721</b>	<b>2,025,693</b>	<b>1,125</b>	<b>180,692</b>
\$600,000 under \$1,000,000.....	306	235,884	177	9,194	1,132	869,047	708	29,334
\$1,000,000 or more.....	177	327,670	138	52,792	589	1,156,646	417	151,359
<b>Other decedents, total <sup>2</sup>.....</b>	<b>299</b>	<b>450,122</b>	<b>266</b>	<b>72,839</b>	<b>507</b>	<b>703,700</b>	<b>439</b>	<b>116,174</b>
\$600,000 under \$1,000,000.....	177	138,606	144	6,219	318	244,838	254	10,259
\$1,000,000 or more.....	122	311,516	122	66,620	188	458,862	184	105,914

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

<sup>2</sup> "Other decedents" includes decedents who were legally separated or divorced at date-of-death, as well as decedents whose marital status at death is unknown.

Note: Detail may not add to totals because of rounding.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 7.—Estate Tax Returns Filed for 1992 Male Decedents: Gross Estate and Estate Tax, by Age and Marital Status of Decedent and Size of Gross Estate**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Marital status, size of gross estate	Total				Age of decedent			
					Under 50 years			
	Gross estate, tax purposes <sup>1</sup>		Net estate tax		Gross estate, tax purposes <sup>1</sup>		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
<b>All decedents, total.....</b>	<b>33,967</b>	<b>64,141,175</b>	<b>11,602</b>	<b>4,727,965</b>	<b>1,584</b>	<b>2,593,461</b>	<b>390</b>	<b>98,323</b>
\$600,000 under \$1,000,000.....	16,928	13,041,186	4,368	184,264	726	566,884	116	4,091
\$1,000,000 or more.....	17,039	51,099,989	7,234	4,543,701	858	2,026,577	274	94,232
<b>Married decedents, total.....</b>	<b>22,336</b>	<b>43,644,915</b>	<b>3,002</b>	<b>1,398,624</b>	<b>1,027</b>	<b>1,818,585</b>	<b>62</b>	<b>15,218</b>
\$600,000 under \$1,000,000.....	10,540	8,181,215	563	25,844	437	343,437	6	221
\$1,000,000 or more.....	11,796	35,463,700	2,438	1,372,780	589	1,475,148	56	14,997
<b>Widowed decedents, total.....</b>	<b>7,027</b>	<b>12,381,558</b>	<b>5,418</b>	<b>2,279,229</b>	<b>20</b>	<b>40,261</b>	<b>13</b>	<b>4,096</b>
\$600,000 under \$1,000,000.....	3,899	2,964,833	2,468	105,862	9	6,861	4	24
\$1,000,000 or more.....	3,128	9,416,725	2,950	2,173,367	10	33,400	9	4,072
<b>Single decedents, total.....</b>	<b>2,995</b>	<b>4,278,693</b>	<b>2,086</b>	<b>538,702</b>	<b>378</b>	<b>539,437</b>	<b>226</b>	<b>62,667</b>
\$600,000 under \$1,000,000.....	1,595	1,209,975	885	33,750	189	145,923	73	2,782
\$1,000,000 or more.....	1,400	3,068,718	1,201	504,952	189	393,514	153	59,885
<b>Other decedents, total <sup>2</sup>.....</b>	<b>1,609</b>	<b>3,836,009</b>	<b>1,097</b>	<b>511,410</b>	<b>159</b>	<b>195,177</b>	<b>89</b>	<b>16,343</b>
\$600,000 under \$1,000,000.....	893	685,164	451	18,807	90	70,662	34	1,064
\$1,000,000 or more.....	715	3,150,845	646	492,602	69	124,515	55	15,279

Marital status, size of gross estate	Age of decedent—Continued							
	50 under 60 years				60 under 70 years			
	Gross estate, tax purposes <sup>1</sup>		Net estate tax		Gross estate, tax purposes <sup>1</sup>		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
<b>All decedents, total.....</b>	<b>2,687</b>	<b>4,963,209</b>	<b>534</b>	<b>144,691</b>	<b>6,538</b>	<b>11,957,280</b>	<b>1,468</b>	<b>516,784</b>
\$600,000 under \$1,000,000.....	1,132	889,421	147	3,921	3,054	2,381,918	544	19,420
\$1,000,000 or more.....	1,554	4,073,788	386	140,770	3,485	9,575,362	924	497,363
<b>Married decedents, total.....</b>	<b>2,085</b>	<b>4,129,897</b>	<b>138</b>	<b>53,438</b>	<b>5,105</b>	<b>9,536,913</b>	<b>440</b>	<b>187,991</b>
\$600,000 under \$1,000,000.....	825	654,811	9	116	2,232	1,748,859	58	555
\$1,000,000 or more.....	1,259	3,475,086	130	53,321	2,873	7,788,054	381	187,436
<b>Widowed decedents, total.....</b>	<b>47</b>	<b>86,189</b>	<b>47</b>	<b>12,422</b>	<b>446</b>	<b>633,885</b>	<b>328</b>	<b>93,058</b>
\$600,000 under \$1,000,000.....	13	10,583	13	356	251	193,978	138	5,997
\$1,000,000 or more.....	34	75,606	34	12,066	195	439,907	191	87,061
<b>Single decedents, total.....</b>	<b>270</b>	<b>319,928</b>	<b>177</b>	<b>31,470</b>	<b>611</b>	<b>807,354</b>	<b>442</b>	<b>99,502</b>
\$600,000 under \$1,000,000.....	157	120,410	79	2,412	347	269,329	229	9,550
\$1,000,000 or more.....	113	199,518	97	29,058	264	538,025	212	89,952
<b>Other decedents, total <sup>2</sup>.....</b>	<b>284</b>	<b>427,196</b>	<b>171</b>	<b>47,362</b>	<b>376</b>	<b>979,128</b>	<b>258</b>	<b>136,232</b>
\$600,000 under \$1,000,000.....	136	103,618	45	1,036	224	169,753	118	3,319
\$1,000,000 or more.....	148	323,578	126	46,325	152	809,375	140	132,914

Footnotes at end of table.

# Federal Taxation of Wealth Transfers, 1992-1995

**Table 7.—Estate Tax Returns Filed for 1992 Male Decedents: Gross Estate and Estate Tax, by Age and Marital Status of Decedent and Size of Gross Estate—Continued**

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Marital status, size of gross estate	Age of decedent—Continued							
	70 under 80 years				80 years and over			
	Gross estate, tax purposes <sup>1</sup>		Net estate tax		Gross estate, tax purposes <sup>1</sup>		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
<b>All decedents, total.....</b>	<b>9,631</b>	<b>19,097,963</b>	<b>2,859</b>	<b>1,139,754</b>	<b>13,527</b>	<b>25,529,262</b>	<b>6,351</b>	<b>2,828,413</b>
\$600,000 under \$1,000,000.....	4,947	3,780,066	1,068	41,496	7,069	5,422,897	2,493	115,336
\$1,000,000 or more.....	4,684	15,317,897	1,791	1,098,259	6,458	20,106,365	3,858	2,713,076
<b>Married decedents, total.....</b>	<b>7,072</b>	<b>14,332,916</b>	<b>946</b>	<b>373,723</b>	<b>7,046</b>	<b>13,826,605</b>	<b>1,416</b>	<b>768,255</b>
\$600,000 under \$1,000,000.....	3,450	2,641,935	144	5,926	3,595	2,792,174	346	19,026
\$1,000,000 or more.....	3,622	11,690,981	802	367,797	3,451	11,034,431	1,069	749,229
<b>Widowed decedents, total.....</b>	<b>1,538</b>	<b>2,373,845</b>	<b>1,162</b>	<b>442,813</b>	<b>4,977</b>	<b>9,247,379</b>	<b>3,867</b>	<b>1,726,840</b>
\$600,000 under \$1,000,000.....	959	724,954	605	23,455	2,667	2,028,457	1,708	76,031
\$1,000,000 or more.....	579	1,648,891	557	419,358	2,310	7,218,922	2,159	1,650,810
<b>Single decedents, total.....</b>	<b>583</b>	<b>753,133</b>	<b>445</b>	<b>99,020</b>	<b>1,153</b>	<b>1,858,840</b>	<b>797</b>	<b>246,043</b>
\$600,000 under \$1,000,000.....	285	220,984	182	6,138	617	453,329	322	12,869
\$1,000,000 or more.....	298	532,149	263	92,882	536	1,405,511	475	233,174
<b>Other decedents, total <sup>2</sup>.....</b>	<b>438</b>	<b>1,638,069</b>	<b>307</b>	<b>224,198</b>	<b>351</b>	<b>596,438</b>	<b>272</b>	<b>87,275</b>
\$600,000 under \$1,000,000.....	253	192,194	137	5,976	190	148,937	117	7,412
\$1,000,000 or more.....	185	1,445,876	169	218,222	161	447,501	155	79,863

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

<sup>2</sup> "Other decedents" includes decedents who were legally separated or divorced at date-of-death, as well as decedents whose marital status at death is unknown.

Note: Detail may not add to totals because of rounding.