

Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

Data Release

The Federal tax system includes taxes for the right to transfer tangible and intangible property. The estate tax, which is part of transfer taxes, is incurred when transferring property at death. This tax applies to the estates of U.S. citizens, resident aliens, and nonresident aliens who die owning property in the United States. The estate tax, whether incurred on estates of U.S. citizens, resident aliens, or nonresident aliens, is not a tax on an inheritance nor on property. Instead, it is a tax on the right to transfer property at death.

The estate tax for U.S. citizens and resident aliens is incurred on estates in which the decedent owned \$600,000 or more in gross assets, for Filing Year 1997. However, the filing threshold of \$600,000 was increased to \$625,000 in 1998 as a result of the passage of the Economic Recovery Tax Act (ERTA) of 1997. The estates of nonresident alien decedents have a filing threshold of \$60,000 in U.S. gross assets. This threshold, established in 1988, was not increased with ERTA 1997. Tangible property owned by nonresident aliens and physically located in the United States comprises the asset part of the nonresident alien's U.S. gross estate. Intangible property is included in a nonresident alien's estate based on the characteristics of the issuer or obligor. If the issuer or obligor is a U.S. citizen or U.S. resident, then the property is considered part of the nonresident alien's U.S. gross assets.

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

In the combined years of 1997 and 1998, some 727 Federal estate tax forms were filed for nonresi-

dent alien decedents (see Figure A) [1]. There were 381 Federal estate tax forms filed in 1997 and 346 Federal estate tax forms filed in the following year. Combined U.S. gross estate of nonresident aliens in 1997 was \$142 million and dropped in 1998 to over \$110 million. The worldwide gross estate (combined gross estate inside and outside the United States) for nonresident alien filers was \$485 million for 1997 and \$334 million for 1998.

For both years, the highest percentage of nonresident alien estates was in the size of U.S. gross estate range, \$100,000 under \$250,000. In 1997, about 35.7 percent of filers were in this range, and the percentage rose in 1998 to 37.6 percent. In the category of the largest estate size, \$1 million or more, only 7.6 percent of filers fit this category for 1997 and even less for 1998, 6.6 percent.

For 1997, 237 nonresident alien estates incurred estate tax liability, and 222 estates incurred tax liabilities for 1998. The estate tax for 1997 was nearly \$20.9 million, and dropped to \$16.2 million for 1998.

Citizenship Data

During 1997 and 1998, U.S. estate tax returns were filed for citizens of 66 foreign countries. For 1997, there were 56 countries represented in the filing population, and for 1998, there were 60 countries. During 1997, Canada led these countries in the number of estate tax returns filed with 154 returns (see Figure B). Germany had the second highest total for 1997 with 47 returns. Japan and the United Kingdom tied for the third place with 22 returns each. Finally, for 1997, Mexico came in fifth with 17 Federal estate tax returns filed. During Filing Year 1998, Canada again led the group with 142 returns filed. Germany also held second place in 1998 with 60 returns filed. The U.S. Possessions, excluding Puerto Rico and the U.S. Virgin Islands, had the third highest returns filed in 1998 with 17. Mexico had 16 filers for 1998, making this country fourth, followed by Venezuela with 14 U.S. estate tax returns filed.

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Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

Figure A

Nonresident Alien Estates: Number of Returns and U.S. Total Gross Estate, by Size of U.S. Total Gross Estate, Filing Years 1997 and 1998

Size of U.S. total gross estate	1997			1998		
	Number of returns	Percent of total	U.S. total gross estate ¹ (dollars)	Number of returns	Percent of total	U.S. total gross estate ¹ (dollars)
	(1)	(2)	(3)	(4)	(5)	(6)
Total	381	100.0	142,014,662	346	100.0	110,294,299
Less than \$60,000.....	25	6.6	823,589	29	8.4	1,206,061
\$60,000 under \$100,000.....	100	26.3	7,656,374	81	23.4	6,458,797
\$100,000 under \$250,000.....	136	35.7	21,704,123	130	37.6	20,542,740
\$250,000 under \$500,000.....	58	15.2	20,467,289	60	17.3	20,993,450
\$500,000 under \$1 million.....	33	8.7	24,383,766	23	6.6	15,187,513
\$1 million or more.....	29	7.6	66,979,521	23	6.6	45,905,738

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

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

Figure B

Nonresident Alien Estates: Top Countries of Citizenship in Number of Returns Filed, Filing Years 1997 and 1998

Country	1997 Number of returns	Country	1998 Number of returns
All	381	All.....	346
Canada.....	154	Canada.....	142
Germany.....	47	Germany.....	60
Japan.....	22	U.S. Possessions ¹	17
United Kingdom.....	22	Mexico.....	16
Mexico.....	17	Venezuela.....	14

¹ The category U.S. possessions excludes Puerto Rico and the U.S. Virgin Islands.

Filing Year 1997 and 1998 Decedents

Demographic Data

For Filing Years 1997 and 1998, some 727 Federal estate tax forms were filed for nonresident alien decedents. This population total is modest considering world population for 1997 and 1998 was 5.8 billion and 5.9 billion, respectively [2]. In both filing years, there were more male decedents than female decedents (see Figure C). In Filing Year 1997, the number of male decedents totaled 271 (71.1 percent), while female decedents equaled 110 (28.9 percent). Male decedents for Filing Year 1998 totaled 234 (67.6 percent), and female decedents totaled 112, (32.4 percent).

The burden of the estate tax fell heavier on the estates of male decedents. This is representative of the number of male decedents in the filing population for 1997 and 1998. The estates of male decedents in Filing Year 1997 assumed 77 percent of total estate tax liability compared to 23 percent assumed by female decedents. The 1997 estate tax payable for male decedents totaled \$16.2 million, and for female decedents, \$4.7 million. This trend continued for Filing Year 1998. The estates of male decedents were responsible for 66 percent of the estate tax compared to the estates of female decedents at 34 percent. This represents almost \$10.8 million for male decedents and \$5.5 million for female decedents.

The average age of death for this nonresident alien population was 71 years for both filing years (see Figure C). The World Health Report from 1998

Figure C

Nonresident Alien Estates: Number of Returns Filed and Average Age at Death, by Sex of Decedent, Filing Years 1997 and 1998

Sex of decedent	1997		1998	
	Number of returns	Average age	Number of returns	Average age
	(1)	(2)	(3)	(4)
All	381	71	346	71
Male.....	271	70	234	70
Female.....	110	74	112	74

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The World Health Report from 1998 lists the average life expectancy for the world as 65 years.

lists the average life expectancy for the world as 65 years [3]. Therefore, the average age of death for the population of nonresident alien decedents exceeded the world average for life expect-

ancy. However, the average for nonresident alien decedents did not exceed the life expectancy for U.S. residents. According to the National Center for Health Statistics, the average life expectancy for a person in the United States in 1997 was 76.5 years [4]. Yet nonresident alien decedents and U.S. residents did have some commonalities in life expectancy. In both populations, females had a higher average life expectancy. Females in the United States had a life expectancy of 79.4 years compared to males with only 73.6 years. By comparison, female nonresident alien decedents had an average life expectancy of 74 years compared to male decedents with 70 years. This relationship held for both Filing Years 1997 and 1998.

Asset Data

The estate tax is applied to the assets of nonresident aliens living in the United States at time of death. For estate tax purposes, the value of the nonresident alien decedent's U.S. assets is based on the fair market value at one of two dates. The decedent's executor or administrator can value the assets at the date of death of the decedent or at an alternate valuation date within 6 months after the decedent's date of death [5].

The 1997 filing year population of nonresident alien estate tax decedents held almost \$65 million in real estate, which represented 45 percent of combined U.S. total gross assets. This was the largest U.S. investment for 1997 decedents (see Figure D). Real estate investments were also the investment of choice for nonresident alien estates in 1998 with over \$44 million. However, the percentage of holdings in real estate compared to other assets in the United States dropped from 45 percent in 1997 to 41 percent in 1998. Real estate holdings included personal residences, as well as the value of real estate partnerships or noncorporate businesses based on the ownership of real estate. For both 1997 and 1998, the second largest holding of assets was in the form

of stocks. For 1997, stock investments in the United States approached \$50 million. This represented 35 percent of total U.S. holdings in gross estate for that year. In 1998, the amount of assets held in stock was over \$32 million, or 29 percent of total U.S. holdings. In both years, the third largest holdings were in the "other" category. This category includes the net value of insurance, depletables/intangibles, annuities, art, and assets that do not fit into any of the categories. In 1997, the other group was over \$9 million, which was 7 percent of total assets for the estates. This figure rose in 1998 to over \$10 million, which captured 9 percent of total assets for the estates. The subgroup within the other category that captured the largest amount of holdings was in the form of annuities for 1997 decedents. For this year, this subgroup totaled \$4.6 million, which represented 3.3 percent of total assets. The other category includes assets that did not fall into the classification system used by SOI, and these nonclassified assets were the largest for the other category in 1998. Assets not classified elsewhere accumulated almost \$4.5 million of total holdings for 1998 assets and accounted for almost 4.1 percent. The final large category for both 1997 and 1998 was the bond category. This grouping included the value of Federal, State, and local government bonds, as well as corporate and foreign bonds. Nonresident alien estates held 5 percent of their assets in the form of bonds in 1997 and 6 percent in 1998. In both years, estates held \$6.9 million in bonds.

Data Sources and Limitations

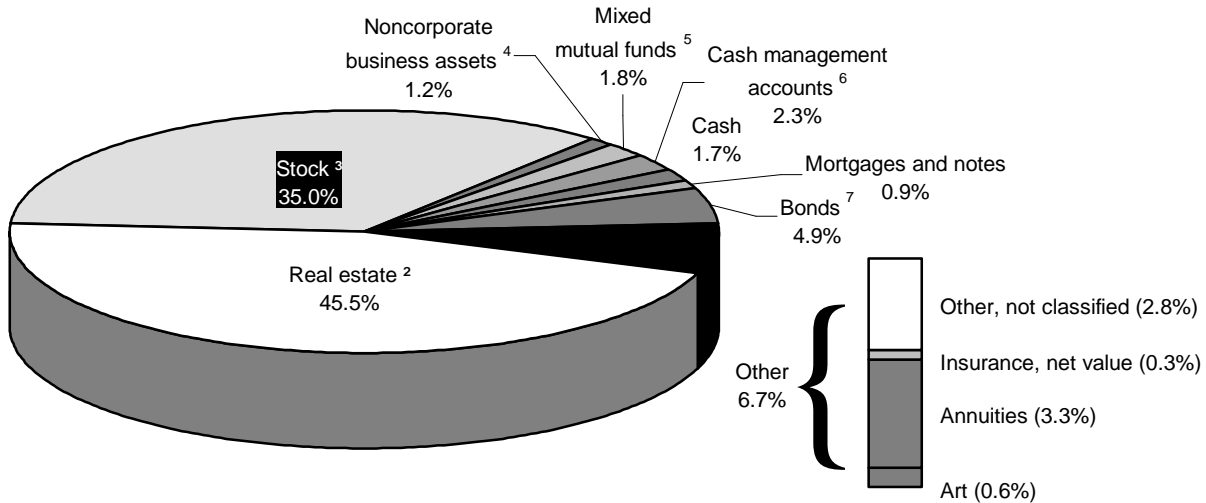
Since 1995, SOI has conducted an annual study of Federal estate tax returns filed for nonresident aliens (Forms 706NA). The demographic, financial, and asset information for Filing Years 1997 and 1998 was extracted from the Forms 706NA that are filed in the Philadelphia Service Center. For each year, nonresident alien estate tax returns were examined for the population of filers. Therefore, the amounts shown in this data release are not estimates but rather pre-audit population figures.

The United States maintains estate and gift tax treaties with a number of countries. These treaties are in place to help avoid double taxation and to provide mutual administrative assistance between the United States and its treaty partners. The United States has Estate Tax Treaties with Australia, Aus-

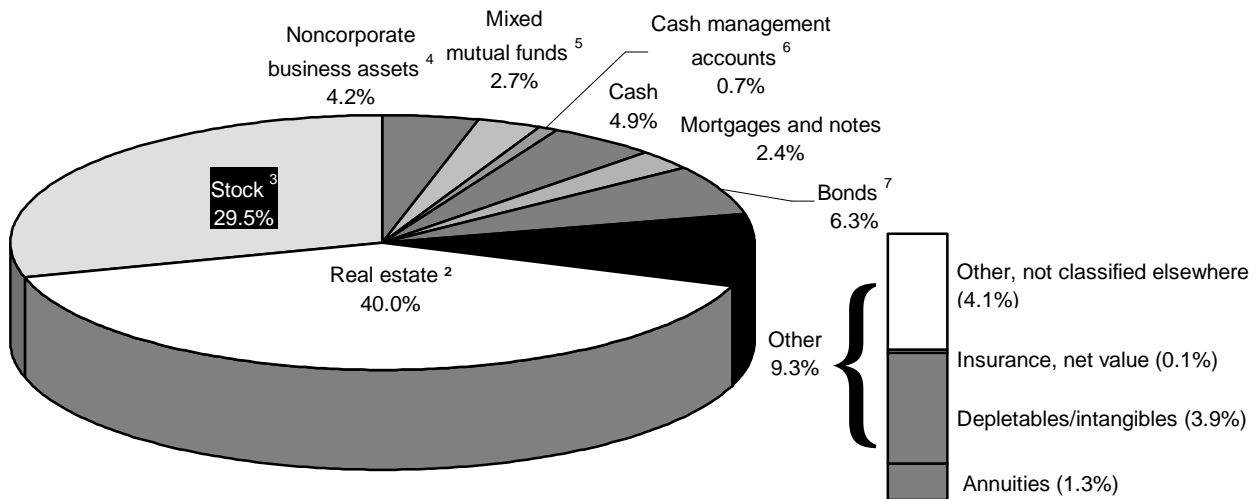
Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

Figure D

Nonresident Alien Estates: Composition of U.S. Gross Estates, Filing Year 1997¹



Nonresident Alien Estates: Composition of U.S. Total Gross Estates, Filing Year 1998¹



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

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

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

⁴ The noncorporate business category includes the value of farm assets, limited partnerships, and other noncorporate business assets.

⁵ The mixed mutual funds category contains the value of funds from assets that are not identified. Therefore, this category may contain the value of stocks, bonds, and other assets in mutual funds.

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

⁷ The bonds category contains the value of Federal, State, and local government bonds, as well as foreign and corporate bonds. The value of mutual funds that are comprised of Federal, State, local government, foreign, and corporate bonds is also included.

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

Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

tria, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Japan, Netherlands, Norway, Republic of South Africa, Sweden, Switzerland, and the United Kingdom. Reporting on these returns varies among countries. Therefore, information extracted from the 227 Forms 706NA explicitly identified as treaty returns in Filing Years 1997 and 1998 is not included in this data release.

Explanation of Selected Terms

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

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

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

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

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

Federal gift taxes previously paid.—Credit was allowed against the estate tax for the Federal gift tax paid on gifts made by a decedent before 1977. No credit, apart from the unified credit, was allowed for any gift tax paid on gifts made after 1976.

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

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

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

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

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

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

Unified credit.—The unified credit, so called because it is used for both estate and gift tax purposes, is applied as a dollar-for-dollar reduction of the estate tax. (The unified credit represents the amount

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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] The data in this paper exclude information pertaining to estates of nonresident aliens who filed estate tax returns from a country that has an estate tax treaty with the United States. See

the Data Sources and Limitations section for more information.

- [2] U.S. Bureau of the Census, International Data Base, 1998.
- [3] World Health Report 1998: Global Health Situations and Trends 1955-2065, 1998.
- [4] National Center for Health Statistics, Table 28, 1999.
- [5] See Internal Revenue Code section 2032 for a full explanation of alternate value.

SOURCE: IRS, Statistics of Income Bulletin, Summer 2000, Publication 1136 (Rev. 8-2000)

Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

Table 1.--Nonresident Alien Estate Tax Returns Filed in 1997: Gross Estate in the U.S., Outside U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits by Tax Status and Size of Gross Estate

[Money amounts are in whole dollars]

Tax status, size of gross estate, U.S.	Total gross estate, U.S. tax purposes ¹		Total gross estate, outside U.S.		Total gross estate, worldwide		Real estate ²	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns.....	381	142,014,662	381	343,102,033	381	485,116,692	256	64,663,195
Less than \$100,000.....	125	8,479,963	125	52,835,684	125	61,315,645	83	5,678,771
\$100,000 under \$500,000.....	194	42,171,412	194	183,762,405	194	225,933,815	137	24,578,818
\$500,000 or more.....	62	91,363,287	62	106,503,944	62	197,867,232	36	34,405,606
Nontaxable returns, total.....	144	47,959,483	144	87,284,154	144	135,243,635	95	19,244,083
Less than \$100,000.....	64	3,759,222	64	29,811,571	64	33,570,791	41	2,535,220
\$100,000 under \$500,000.....	59	11,925,332	59	26,733,018	59	38,658,350	42	7,137,784
\$500,000 or more.....	21	32,274,929	21	30,739,565	21	63,014,494	12	9,571,079
Taxable returns, total.....	237	94,055,179	237	255,817,879	237	349,873,057	161	45,419,112
Less than \$100,000.....	61	4,720,741	61	23,024,113	61	27,744,854	42	3,143,551
\$100,000 under \$500,000.....	135	30,246,080	135	157,029,387	135	187,275,465	95	17,441,034
\$500,000 or more.....	41	59,088,358	41	75,764,379	41	134,852,738	24	24,834,527

Tax status, size of gross estate, U.S.	Stock ³		Bonds ⁴		Mixed mutual funds ⁵		Cash	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All returns.....	116	49,673,772	30	6,915,617	22	2,600,815	70	2,402,692
Less than \$100,000.....	25	1,523,871	5	186,167	**	**	10	72,346
\$100,000 under \$500,000.....	60	9,929,149	12	1,780,198	**13	**770,727	40	1,010,379
\$500,000 or more.....	31	38,220,752	13	4,949,252	9	1,830,088	20	1,319,967
Nontaxable returns, total.....	37	15,920,040	12	2,227,133	7	1,214,750	25	1,034,688
Less than \$100,000.....	10	589,616	**	**	--	--	5	59,849
\$100,000 under \$500,000.....	18	2,162,546	**9	**936,009	4	358,309	13	354,889
\$500,000 or more.....	9	13,167,878	3	1,291,124	3	856,441	7	619,950
Taxable returns, total.....	79	33,753,732	18	4,688,484	15	1,386,065	45	1,368,004
Less than \$100,000.....	15	934,255	**	**	**	**	5	12,497
\$100,000 under \$500,000.....	42	7,766,603	**8	**1,030,356	**9	**412,418	27	655,490
\$500,000 or more.....	22	25,052,874	10	3,658,128	6	973,647	13	700,017

Tax status, size of gross estate, U.S.	Cash management accounts ⁶		Insurance, net value		Noncorporate businesses ⁷		Mortgages and notes	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All returns.....	24	1,704,718	--	--	25	3,286,505	6	1,283,130
Less than \$100,000.....	4	177,981	--	--	6	375,855	**	**
\$100,000 under \$500,000.....	8	511,372	--	--	13	1,071,939	--	--
\$500,000 or more.....	12	1,015,365	--	--	6	1,838,711	**6	**1,283,130
Nontaxable returns, total.....	11	779,275	--	--	6	1,219,184	3	370,888
Less than \$100,000.....	**	**	--	--	**	**	**	**
\$100,000 under \$500,000.....	**6	**181,113	--	--	**6	**1,219,184	--	--
\$500,000 or more.....	5	598,162	--	--	**	**	**3	**370,888
Taxable returns, total.....	13	925,443	--	--	19	2,067,321	3	912,242
Less than \$100,000.....	**	**	--	--	**	**	**	**
\$100,000 under \$500,000.....	**6	**508,240	--	--	**19	**2,067,321	--	--
\$500,000 or more.....	7	417,203	--	--	**	**	**3	**912,242

Footnotes at end of table.

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Table 1.--Nonresident Alien Estate Tax Returns Filed in 1997: Gross Estate in the U.S., Outside U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits by Tax Status and Size of Gross Estate--Continued

[Money amounts are in whole dollars]

Tax status, size of gross estate, U.S.	Other assets		Funeral expenses		Executors' commissions		Attorneys' fees	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All returns.....	81	9,484,521	112	1,205,578	30	2,019,471	101	2,976,728
Less than \$100,000.....	17	407,692	28	142,650	3	13,882	22	179,868
\$100,000 under \$500,000.....	47	2,541,407	63	910,903	16	535,480	56	1,370,389
\$500,000 or more.....	17	6,535,422	21	152,025	11	1,470,109	23	1,426,471
Nontaxable returns, total.....	28	5,949,442	41	385,406	6	71,717	29	396,824
Less than \$100,000.....	8	195,591	16	94,880	**	**	12	77,206
\$100,000 under \$500,000.....	13	748,441	19	251,377	**6	**71,717	12	104,919
\$500,000 or more.....	7	5,005,410	6	39,149	**	**	5	214,699
Taxable returns, total.....	53	3,535,079	71	820,172	24	1,947,754	72	2,579,904
Less than \$100,000.....	9	212,101	12	47,770	**	**	10	102,662
\$100,000 under \$500,000.....	34	1,792,966	44	659,526	**24	**1,947,754	44	1,265,470
\$500,000 or more.....	10	1,530,012	15	112,876	**	**	18	1,211,772

Tax status, size of gross estate, U.S.	Other expenses and losses		Debts and mortgages		Marital and charitable deductions		Total allowable deductions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All returns.....	158	14,896,545	90	34,483,288	51	37,361,598	234	53,658,517
Less than \$100,000.....	40	1,131,001	23	1,266,403	6	3,334,267	62	3,884,400
\$100,000 under \$500,000.....	86	5,694,225	50	17,782,543	22	7,324,252	123	11,802,663
\$500,000 or more.....	32	8,071,319	17	15,434,342	23	26,703,079	49	37,971,454
Nontaxable returns, total.....	55	4,093,182	39	14,849,990	35	30,354,986	95	38,533,977
Less than \$100,000.....	22	888,766	12	1,003,511	6	3,334,267	36	3,720,837
\$100,000 under \$500,000.....	22	816,572	19	6,135,621	14	6,723,935	38	9,020,799
\$500,000 or more.....	11	2,387,844	8	7,710,858	15	20,296,784	21	25,792,341
Taxable returns, total.....	103	10,803,363	51	19,633,298	16	7,006,612	139	15,124,540
Less than \$100,000.....	18	242,235	11	262,892	--	--	26	163,563
\$100,000 under \$500,000.....	64	4,877,653	31	11,646,922	8	600,317	85	2,781,864
\$500,000 or more.....	21	5,683,475	9	7,723,484	8	6,406,295	28	12,179,113

Tax status, size of gross estate, U.S.	Taxable estate		Adjusted taxable estate		Tentative estate tax		Estate tax before credits	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All returns.....	352	95,468,291	353	95,792,623	348	31,614,773	348	31,557,076
Less than \$100,000.....	117	7,651,003	117	7,651,003	116	1,663,806	117	1,682,222
\$100,000 under \$500,000.....	185	33,630,182	185	33,913,264	181	9,299,096	181	9,231,483
\$500,000 or more.....	50	54,187,106	51	54,228,356	51	20,651,871	50	20,643,371
Nontaxable returns, total.....	115	16,540,268	116	16,706,518	113	5,306,751	111	5,231,151
Less than \$100,000.....	56	3,093,824	56	3,093,824	56	670,962	56	670,962
\$100,000 under \$500,000.....	50	6,165,843	50	6,290,843	47	1,644,056	46	1,576,956
\$500,000 or more.....	9	7,280,601	10	7,321,851	10	2,991,733	9	2,983,233
Taxable returns, total.....	237	78,928,023	237	79,086,105	235	26,308,022	237	26,325,925
Less than \$100,000.....	61	4,557,179	61	4,557,179	60	992,844	61	1,011,260
\$100,000 under \$500,000.....	135	27,464,339	135	27,622,421	134	7,655,040	135	7,654,527
\$500,000 or more.....	41	46,906,505	41	46,906,505	41	17,660,138	41	17,660,138

Footnotes at end of table.

Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

Table 1.--Nonresident Alien Estate Tax Returns Filed in 1997: Gross Estate in the U.S., Outside U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits by Tax Status and Size of Gross Estate--Continued

[Money amounts are in whole dollars]

Tax status, size of gross estate, U.S.	Allowable unified credit		State death tax credit		Other credits		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns.....	339	6,470,298	88	1,325,607	18	3,185,110	237	20,885,441
Less than \$100,000.....	113	1,552,879	**	**	4	14,149	61	273,715
\$100,000 under \$500,000.....	179	3,704,509	**62	**149,937	10	338,031	135	5,189,747
\$500,000 or more.....	47	1,212,910	26	1,175,670	4	2,832,930	41	15,421,979
Nontaxable returns, total.....	111	2,611,181	4	102,497	8	2,826,850	--	--
Less than \$100,000.....	56	821,279	**	**	**	**	--	--
\$100,000 under \$500,000.....	46	1,582,725	**4	**102,497	**8	**2,826,850	--	--
\$500,000 or more.....	9	207,177	**	**	**	**	--	--
Taxable returns, total.....	228	3,859,117	84	1,223,110	10	358,260	237	20,885,441
Less than \$100,000.....	57	731,600	**	**	**	**	61	273,715
\$100,000 under \$500,000.....	133	2,121,784	**84	**1,223,110	**10	**358,260	135	5,189,747
\$500,000 or more.....	38	1,005,733	**	**	**	**	41	15,421,979

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

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

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

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

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

⁵ The mixed mutual funds category contains the value of funds from assets that are not identified. Therefore, this category may contain the value of stocks, bonds, and other assets in mutual funds.

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

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

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

Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

Table 2.--Nonresident Alien Estate Tax Returns Filed in 1998: Gross Estate in the U.S., Outside U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits by Tax Status and Size of U.S. Gross Estate

[Money amounts are in whole dollars]

Tax status, size of gross estate, U.S.	Total gross estate, U.S. tax purposes ¹		Total gross estate, outside U.S.		Total gross estate, worldwide		Real estate ²	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All returns.....	346	110,294,299	346	223,309,391	346	333,603,684	217	44,068,562
Less than \$100,000.....	110	7,664,858	110	46,044,353	110	53,709,211	68	4,639,683
\$100,000 under \$500,000.....	190	41,536,190	190	107,275,069	190	148,811,254	125	22,181,293
\$500,000 or more.....	46	61,093,251	46	69,989,969	46	131,083,219	24	17,247,586
Nontaxable returns, total.....	124	31,822,165	124	56,986,744	124	88,808,904	81	14,872,324
Less than \$100,000.....	64	3,928,836	64	22,459,360	64	26,388,196	40	2,357,957
\$100,000 under \$500,000.....	51	11,087,682	51	26,354,648	51	37,442,326	35	6,115,950
\$500,000 or more.....	9	16,805,647	9	8,172,736	9	24,978,382	6	6,398,417
Taxable returns, total.....	222	78,472,134	222	166,322,647	222	244,794,780	136	29,196,238
Less than \$100,000.....	46	3,736,022	46	23,584,993	46	27,321,015	28	2,281,726
\$100,000 under \$500,000.....	139	30,448,508	139	80,920,421	139	111,368,928	90	16,065,343
\$500,000 or more.....	37	44,287,604	37	61,817,233	37	106,104,837	18	10,849,169
Tax status, size of gross estate, U.S.	Stock ³		Bonds ⁴		Mixed mutual funds ⁵		Cash	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All returns.....	103	32,453,264	26	6,897,904	17	2,992,294	52	5,366,852
Less than \$100,000.....	18	1,246,632	3	115,841	**	**	13	229,265
\$100,000 under \$500,000.....	56	9,205,080	14	1,281,206	**14	**1,086,788	25	981,750
\$500,000 or more.....	29	22,001,552	9	5,500,857	3	1,905,506	14	4,155,837
Nontaxable returns, total.....	30	9,528,711	6	340,253	6	358,015	21	623,715
Less than \$100,000.....	9	569,432	**	**	**	**	10	37,345
\$100,000 under \$500,000.....	17	2,880,773	**6	**340,253	**6	**358,015	8	189,601
\$500,000 or more.....	4	6,078,506	--	--	**	**	3	396,769
Taxable returns, total.....	73	22,924,553	20	6,557,651	11	2,634,279	31	4,743,137
Less than \$100,000.....	9	677,200	**	**	**	**	3	191,920
\$100,000 under \$500,000.....	39	6,324,307	**11	**1,056,794	**11	**2,634,279	17	792,149
\$500,000 or more.....	25	15,923,046	9	5,500,857	**	**	11	3,759,068
Tax status, size of gross estate, U.S.	Cash management accounts ⁶		Insurance, net value		Noncorporate businesses ⁷		Mortgages and notes	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All returns.....	22	803,016	3	124,251	36	4,658,054	8	2,697,651
Less than \$100,000.....	**	**	--	--	12	840,535	**	**
\$100,000 under \$500,000.....	**17	**609,528	3	124,251	**24	**3,817,519	**4	**453,665
\$500,000 or more.....	5	193,488	--	--	**	**	4	2,243,986
Nontaxable returns, total.....	5	350,272	**	**	12	750,843	--	--
Less than \$100,000.....	**	**	--	--	9	621,285	--	--
\$100,000 under \$500,000.....	**5	**350,272	**	**	3	129,558	--	--
\$500,000 or more.....	--	--	--	--	--	--	--	--
Taxable returns, total.....	17	452,744	**	**	24	3,907,211	8	2,697,651
Less than \$100,000.....	**	**	--	--	3	219,250	**	**
\$100,000 under \$500,000.....	**12	**259,256	**	**	**21	**3,687,961	**4	**453,665
\$500,000 or more.....	5	193,488	--	--	**	**	4	2,243,986

Footnotes at end of table.

Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

Table 2.--Nonresident Alien Estate Tax Returns Filed in 1998: Gross Estate in the U.S., Outside U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits by Tax Status and Size of U.S. Gross Estate--Continued

[Money amounts are in whole dollars]

Tax status, size of gross estate, U.S.	Other assets		Funeral expenses		Executors' commissions		Attorneys' fees	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All returns.....	79	10,232,473	96	656,685	14	808,715	57	1,740,295
Less than \$100,000.....	25	274,132	26	120,065	**	**	10	54,848
\$100,000 under \$500,000.....	47	2,117,354	52	335,114	**8	**522,826	32	489,740
\$500,000 or more.....	7	7,840,987	18	201,506	6	285,889	15	1,195,707
Nontaxable returns, total.....	32	4,930,952	38	252,980	4	63,664	21	209,909
Less than \$100,000.....	15	173,252	16	73,827	**4	**63,664	7	28,887
\$100,000 under \$500,000.....	**17	**4,757,700	19	121,210	--	--	11	154,599
\$500,000 or more.....	**	**	3	57,943	**	**	3	26,423
Taxable returns, total.....	47	5,301,521	58	403,705	10	745,051	36	1,530,386
Less than \$100,000.....	10	100,880	10	46,238	--	--	3	25,961
\$100,000 under \$500,000.....	**37	**5,200,641	33	213,904	**10	**745,051	21	335,141
\$500,000 or more.....	**	**	15	143,563	**	**	12	1,169,284

Tax status, size of gross estate, U.S.	Other expenses and losses		Debts and mortgages		Marital and charitable deductions		Total allowable deductions	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All returns.....	137	7,420,802	93	14,186,581	49	22,771,249	208	34,748,442
Less than \$100,000.....	40	836,200	24	1,442,845	9	343,659	61	804,656
\$100,000 under \$500,000.....	71	3,814,093	51	6,403,285	27	4,196,198	107	8,423,843
\$500,000 or more.....	26	2,770,509	18	6,340,451	13	18,231,392	40	25,519,943
Nontaxable returns, total.....	54	2,531,990	35	4,658,289	29	17,094,653	90	22,482,916
Less than \$100,000.....	26	576,784	16	646,204	9	343,659	44	685,870
\$100,000 under \$500,000.....	23	1,156,841	**19	**4,012,085	14	3,032,323	37	5,420,839
\$500,000 or more.....	5	798,365	**	**	6	13,718,671	9	16,376,207
Taxable returns, total.....	83	4,888,812	58	9,528,292	20	5,676,596	118	12,265,526
Less than \$100,000.....	14	259,416	8	796,641	--	--	17	118,786
\$100,000 under \$500,000.....	48	2,657,252	**50	**8,731,651	13	1,163,875	70	3,003,004
\$500,000 or more.....	21	1,972,144	**	**	7	4,512,721	31	9,143,736

Tax status, size of gross estate, U.S.	Taxable estate		Adjusted taxable estate		Tentative estate tax		Estate tax before credits	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All returns.....	335	77,615,407	335	77,630,407	332	23,742,063	332	23,713,263
Less than \$100,000.....	110	6,860,200	110	6,860,200	109	1,492,125	109	1,479,125
\$100,000 under \$500,000.....	183	34,197,819	183	34,212,819	181	9,228,568	181	9,212,768
\$500,000 or more.....	42	36,557,388	42	36,557,388	42	13,021,370	42	13,021,370
Nontaxable returns, total.....	113	11,408,813	113	11,408,813	110	2,750,390	110	2,750,390
Less than \$100,000.....	64	3,242,965	64	3,242,965	63	678,916	63	678,916
\$100,000 under \$500,000.....	44	6,752,319	44	6,752,319	42	1,638,673	42	1,638,673
\$500,000 or more.....	5	1,413,529	5	1,413,529	5	432,801	5	432,801
Taxable returns, total.....	222	66,206,594	222	66,221,594	222	20,991,673	222	20,962,873
Less than \$100,000.....	46	3,617,235	46	3,617,235	46	813,209	46	800,209
\$100,000 under \$500,000.....	139	27,445,500	139	27,460,500	139	7,589,895	139	7,574,095
\$500,000 or more.....	37	35,143,859	37	35,143,859	37	12,588,569	37	12,588,569

Footnotes at end of table.

Federal Estate Tax Returns Filed for Nonresident Aliens, 1997 and 1998

Table 2.--Nonresident Alien Estate Tax Returns Filed in 1998: Gross Estate in the U.S., Outside U.S., and Worldwide, and U.S. Gross Estate by Type of Property, Deductions, Taxable Estate, Estate Tax, and Tax Credits by Tax Status and Size of U.S. Gross Estate--Continued

[Money amounts are in whole dollars]

Tax status, size of gross estate, U.S.	Allowable unified credit		State death tax credit		Other credits		Net estate tax	
	Number	Amount	Number	Amount	Number	Amount	Number	Amount
	(49)	(50)	(51)	(52)	(53)	(54)	(55)	(56)
All returns.....	327	6,612,804	83	710,763	13	388,032	222	16,241,847
Less than \$100,000.....	107	1,239,522	3	11,044	5	30,965	46	232,225
\$100,000 under \$500,000.....	178	3,869,125	66	264,289	**8	**357,067	139	5,089,446
\$500,000 or more.....	42	1,504,157	14	435,430	**	**	37	10,920,176
Nontaxable returns, total.....	110	2,663,858	5	105,683	9	221,034	--	--
Less than \$100,000.....	63	675,130	**	**	**	**	--	--
\$100,000 under \$500,000.....	42	1,597,054	**5	**105,683	**9	**221,034	--	--
\$500,000 or more.....	5	391,674	--	--	**	**	--	--
Taxable returns, total.....	217	3,948,946	78	605,080	4	166,998	222	16,241,847
Less than \$100,000.....	44	564,392	**	**	**	**	46	232,225
\$100,000 under \$500,000.....	136	2,272,071	**64	**169,650	**4	**166,998	139	5,089,446
\$500,000 or more.....	37	1,112,483	14	435,430	**	**	37	10,920,176

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

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

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

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

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

⁵ The mixed mutual funds category contains the value of funds from assets that are not identified. Therefore, this category may contain the value of stocks, bonds, and other assets in mutual funds.

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

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