

Refund based on such credits may (despite the provisions of sections 910 to 912, inclusive) be made if claim therefor is filed within the period above provided. Any such refund shall be made without interest."

53 Stat. 138, 139.  
26 U. S. C. §§ 910, 912.

(b) CREDIT AGAINST ADDITIONAL ESTATE TAX.—Section 936 (relating to credits against estate tax) is hereby amended by adding at the end thereof the following new subsection:

53 Stat. 142.  
26 U. S. C. § 936.

"(c) ESTATE, ETC., TAXES PAID TO FOREIGN COUNTRIES.—

"(1) IN GENERAL.—In the case of the estate of a citizen or resident of the United States, the tax imposed by section 935 shall be credited with the amount of any estate, inheritance, legacy, or succession taxes actually paid to any foreign country in respect of any property situated within such foreign country and included in the gross estate (not including any such taxes paid with respect to the estate of a person other than the decedent). If the decedent at the time of his death was not a citizen of the United States, credit shall not be allowed under this subsection unless the foreign country of which such decedent was a citizen or subject, in imposing such taxes, allows a similar credit in the case of a citizen of the United States resident in such country. The determination of the country within which property is situated shall be made in accordance with the rules applicable under Part III of subchapter A in determining whether property is situated within or without the United States.

53 Stat. 129.  
26 U. S. C. § 860 et seq.

"(2) LIMITATIONS ON CREDIT.—The credit provided in this subsection with respect to such taxes paid to any foreign country—

"(A) shall not exceed the amount by which such taxes paid to the foreign country exceed the amount of the credit allowed therefor under section 813 (c); and

*Ante*, p. 563.

"(B) shall not exceed an amount which bears the same ratio to the tax imposed by section 935 (after deducting from such tax the credit provided by subsection (b) of this section) as the value of property which is—

"(i) situated within such foreign country,

"(ii) subjected to the taxes of such foreign country,

and

"(iii) included in the gross estate

bears to the value of the entire gross estate reduced by the aggregate amount of the deductions allowed under subsections (c), (d), and (e) of section 812.

"(3) SAME—SPECIAL RULES.—

53 Stat. 123; 62 Stat. 117.  
26 U. S. C. § 812.

"(A) For the purposes of paragraph (2) (A), 'such taxes paid to the foreign country' shall, with respect to any tax paid to the foreign country, be the amount computed under section 813 (c) (2) (A).

*Ante*, p. 563.

"(B) The values referred to in the ratio stated in paragraph (2) (B) are the values determined under this chapter; but, in applying such ratio, the value of any property described in clauses (i), (ii), and (iii) thereof shall be reduced by such amount as will properly reflect, in accordance with regulations prescribed by the Secretary, the deductions allowed in respect of such property under subsections (c), (d), and (e) of section 812.

"(4) PROOF OF CREDIT.—

"For provisions relating to proof of credit, see section 813

(c) (4).

*Ante*, p. 564.

"(5) PERIOD OF LIMITATION.—

"For provisions relating to period of limitation on claiming