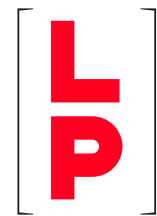


U.S. Estate and Gift Tax Treaties



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Country	Estate Tax Treaty Only	Gift Tax Treaty Only	Combined Estate and Gift Tax Treaty	Other	Transfers made on or after	Comments	
Australia	No	Yes	No	No	12/14/1953		PR-UC
Australia	Yes	No	No	No	01/07/1954	old*	PR-UC
Austria	No	No	Yes	No	07/01/1983	new*	
Belgium	Yes	No	No	No	not yet	old	no effect
Canada	No	No	No	1955 Protocol	11/09/1995**	estate tax only	PR-UC
Denmark	No	No	Yes	No	11/07/1984	new	
Finland	Yes	No	No	No	12/18/1952	old	PR-UC
France	No	No	Yes	No	10/01/1980	new	PR-UC (Protocol)
Germany	No	No	Yes	No	01/01/1979	new	PR-UC (Protocol)
Greece	Yes	No	No	No	12/30/1953	old	PR-UC
Ireland	Yes	No	No	No	12/20/1951	old	
Italy	Yes	No	No	No	10/26/1956	old	PR-UC
Japan	No	No	Yes	No	04/01/1955	old	PR-UC
Netherlands	Yes	No	No	No	02/03/1971	new	
Norway	Yes	No	No	No	12/11/1951	old	PR-UC
South Africa	Yes	No	No	No	07/15/1952	old	
Sweden	No	No	Yes	No	09/05/1984 (through 12/31/2007)	new (terminated 01/01/2008)	
Switzerland	Yes	No	No	No	09/17/1952	old	PR-UC
U.K.	No	No	Yes	No	11/11/1979	new	



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From a U.S. Perspective: General Treatment of Assets of Non-Citizen, Non-Domiciled for U.S. Tax Purposes

Asset Class	Considered U.S. Situs for Estate Tax Purposes	Not Considered U.S. Situs for Estate Tax Purposes	Considered U.S. Situs for Gift Tax Purposes	Not Considered U.S. Situs for Gift Tax Purposes
Foreign Situs Assets		X		X
U.S. Real Property	X		X	
Foreign Real Property		X		X
U.S. Real Property Held by Foreign Corporation		X		X
U.S. Bank Deposits (checking, savings, CD)		X	X	
U.S. Brokerage Deposits	X			X
U.S. Money Market Accounts	X			X
U.S. Mutual Funds	X			X
Tangible Personal Property Located in United States	X		X	
Works of Art on Loan for Exhibition in United States		X		X
Currency/Cash Located in United States	X		X	
Stock U.S. Corporation	X			X
Stock Foreign Corporation; American Depository Receipt Foreign Corporation		X		X
Intangible Personal Property Issued by or Enforceable Against U.S. Resident, Corporation or Governmental Unit	X			X
Qualified U.S. Portfolio Debt Obligations		X		X
Proceeds of Life Insurance on the Life of a Non-Citizen Non-Domiciliary		X		X