

TPT credit

- Two decedents must die within 10 years of each other
 - Credit scaled back for every two years that 2d decedent survives 1st
- Base credit subject to two limits
 - Amount of estate tax paid by 1st decedent's estate on property left to 2d decedent (using average rate)
 - Amount of estate tax saved in 2d decedent's estate by subtracting value of property received from 1st decedent (using marginal rate)
- Property transferred by 1st decedent does not need to be in 2d decedent's estate
 - Credit applies even if property has been sold, given away, or consumed
 - Use values in 1st decedent's estate - IRC § 2013(d)
- Credit applies to life estate created by 1st decedent in favor 2d decedent
 - Use actuarial value of life estate as of 1st decedent's death