



JOINT COMMITTEE ON TAXATION

July 6, 2016

JCX-64-16

**DESCRIPTION OF AN AMENDMENT IN THE NATURE OF
A SUBSTITUTE TO THE PROVISIONS OF H.R. 5523, THE
“CLYDE-HIRSCH-SOWERS RESPECT ACT”**

The Chairman’s amendment in the nature of a substitute modifies H.R. 5523. The Chairman’s amendment in the nature of a substitute replaces “paid” with “received” on pages 4 and 5 at line 19 and line 1, respectively, and in the new entry for the Code table of sections following line 13 of H.R. 5523.

The Chairman’s amendment in the nature of a substitute also replaces “I.R.S.” with “Internal Revenue Service” on page 4, line 20, and on page 5, line 2, and in the new entry for the Code table of sections following line 13 of H.R. 5523.

The Chairman’s amendment in the nature of a substitute replaces “139F” with “139G” on page 4, line 10, and in the new entry for the Code table of sections following line 13 of H.R. 5523.

The Chairman’s amendment in the nature of a substitute revises section 3 of H.R. 5523 at page 4, at lines 14 through 19, to clarify that the interest that may be excludible from income is all interest “...received from the Federal Government in connection with an action to recover property seized by the Internal Revenue Service pursuant to section 5317(c)(2) of title 31, United States Code, by reason of a claimed violation of section 5324 of such title.”

The proposal is estimated to reduce Federal fiscal year budget receipts by less than \$500,000 for the period 2017 through 2026.