

AMENDMENT

OFFERED BY MR. BRADY OF TEXAS

Strike section 441 (relating to surcharge on high income individuals).

Strike section 443 (relating to delay in application of worldwide allocation of interest).

Strike section 451 (relating to limitation on treaty benefits for certain deductible payments).

Strike section 452 (relating to codification of economic substance doctrine).

Strike section 453 (relating to penalties for underpayments).

