

Wyden Amendment #1 – Perfecting Amendment

Wyden Amendment #1 to the United States-Taiwan Expedited Double-Tax Relief Act

Short Title: Perfecting amendment

Description of Amendment: To be determined.

Menendez Amendment #1 to the United States-Taiwan Expedited Double-Tax Relief Act

Short Title: Requirement for tax agreement between US and Taiwan

Description of Amendment: This amendment would state that the provisions of the Act take effect upon entry into force of a tax agreement between the US and Taiwan.

Menendez Amendment #2 to the United States-Taiwan Expedited Double-Tax Relief Act

Short Title: Sunset in the absence of Congressionally-approved agreement

Description of Amendment: This amendment would provide that the provisions of the Act shall terminate after two years, unless the Congress has approved a tax agreement between the U.S. and Taiwan that, at minimum, covers the provisions included in the Act.

Whitehouse-Warren Amendment #1 to the United States-Taiwan Expedited Double-Tax Relief Act

Short Title: Briefing Congress on efforts to establish a program for the exchange of tax information between the U.S. and Taiwan.

Description of Amendment: Requires the Secretary to brief Congress 24 months after the date of enactment on the efforts between the United States and Taiwan to establish a program for the exchange of tax information. If the United States and Taiwan have already established such a program by that time, no such briefing is required.

Cortez Masto/Blackburn Amendment #1 to the Chairman’s Mark of the “United States-Taiwan Expedited Double-Tax Relief Act”

Short Title: Avoiding Double Taxation on Entertainment Income

Description of Amendment: Where the amount of the gross receipts derived by an entertainer or athlete, including expenses reimbursed to him or borne on his behalf, from personal activities as such exercised in the United States does not exceed thirty thousand United States dollars (30,000) for the taxable year of the payment, such income will be included within the scope of qualified wages.

Where income in respect of activities exercised by such entertainer or athlete in the United States in such entertainer’s or athlete’s capacity accrues not to the entertainer or athlete but to another person, that income is not within the scope of qualified wages, unless the contract pursuant to which the personal activities are performed allows that other person to designate the individual who is to perform the personal activities.

Provides that such benefits only apply once the Treasury Secretary has confirmed reciprocity requirements are met.

Notes: Proposed amendment is substantially similar to Article 16 of the 2016 U.S. Model Income Tax Convention.

Crapo #1 to the United States-Taiwan Expedited Double-Tax Relief Act

Short Title: Placeholder/TBD

Description of Amendment: Placeholder/TBD

Offset: TBD

Cornyn Amendment #1 to the United States-Taiwan Expedited Double-Tax Relief Act.

Short Title: Terminate the United States-People's Republic of China Income Tax Convention if the People's Liberation Army initiates an armed attack against Taiwan.

Description of Amendment:

SECTION 1. CONDITIONAL TERMINATION OF THE UNITED STATES-PEOPLE'S REPUBLIC OF CHINA INCOME TAX CONVENTION.

- (a) IN GENERAL.—The Secretary of the Treasury shall provide written notice to the People's Republic of China through diplomatic channels of the United States' intent to terminate the United States-The People's Republic of China Income Tax Convention, done at Beijing April 30, 1984 and entered into force January 1, 1987, as provided by Article 28 of the Convention, not later than 30 days after the President notifies the Secretary of the Treasury that the People's Liberation Army has initiated an armed attack against the Republic of China (commonly known as "Taiwan").
- (b) CONGRESSIONAL NOTIFICATION.—The President shall submit written notification of a termination described in subsection (a) to—
- (1) the Committee on Foreign Relations of the Senate; and
 - (2) the Committee on Finance of the Senate.

Offset: Not necessary.

Cornyn Amendment #2 to the United States-Taiwan Expedited Double-Tax Relief Act.

Short Title: To make certain improvements to the United States-Taiwan Expedited Double-Tax Relief Act.

Description of Amendment: TBD.

Offset: TBD.

Cornyn Amendment #3 to the United States-Taiwan Expedited Double-Tax Relief Act.

Short Title: To make certain improvements to the United States-Taiwan Expedited Double-Tax Relief Act.

Description of Amendment: TBD.

Offset: TBD.