

**Amendment to the Amendment in the Nature of a Substitute to H. Con. Res. 14  
Offered by Rep. Moore**

The Mom and Pop Tax Relief Amendment

This amendment would replace the existing 199A deduction with a small business deduction of \$25,000 on Qualifying Business Income phasing-out for business owners with over \$200,000 in income for single filers and over \$400,000 in income for joint filers.

**AMENDMENT****OFFERED BY M**\_\_\_\_.

Section 110005 is amended by striking subsections (b), (c), and (e).

Section 110005(d)(1) is amended by striking “Subsections (b)(1)(B) and” and inserting “Subsection”.

Section 110005(d) is amended by striking paragraph (2).

Section 110005 is amended by inserting after subsection (e) the following new subsections:

1       (f) DEDUCTION ALLOWED FOR FIRST \$25,000 OF  
2 QUALIFIED BUSINESS INCOME.—

3           (1) IN GENERAL.—Section 199A(b)(1) is  
4 amended to read as follows:

5           “(1) IN GENERAL.—The term ‘combined qualified  
6       qualified business income amount’ means, with respect to  
7       any taxable year, an amount equal to the lesser of—

8           “(A) the sum of the taxpayer’s qualified  
9       business income for each qualified trade or  
10       business carried on by the taxpayer, or

11           “(B) \$25,000.”.

12       (2) CONFORMING AMENDMENTS.—

1 (A) Section 199A(a)(2) is amended by  
2 striking “20 percent of”.

3 (B) Section 199A(b) is amended by strik-  
4 ing paragraph (2).

5 (g) CONSOLIDATED TAXPAYER LEVEL ADJUSTED  
6 GROSS INCOME LIMITATION.—Section 199A(b) of such  
7 Code is amended—

8 (1) by striking paragraph (3), and

9 (2) by inserting after paragraph (1) the fol-  
10 lowing new paragraph:

11 “(2) ADJUSTED GROSS INCOME LIMITATION.—  
12 The combined qualified business income of the tax-  
13 payer for the taxable year shall be reduced (but not  
14 below zero) by so much of the amount by which the  
15 adjusted gross income of the taxpayer exceeds  
16 \$200,000 (\$400,000 in the case of a joint return).”.

17 (h) SIMPLIFICATION WITH RESPECT TO LOSS CAR-  
18 RYOVER.—Section 199(c) is amended by striking para-  
19 graph (2).

20 (i) OTHER CONFORMING AMENDMENTS.—

21 (1)(A) Section 199A(b) is amended by striking  
22 paragraph (4).

23 (B) Section 199A(g)(1)(B)(ii) is amended to  
24 read as follows: