

114TH CONGRESS  
1ST SESSION

# H. R. 961

To amend the Internal Revenue Code of 1986 to permanently extend the subpart F exemption for active financing income.

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## IN THE HOUSE OF REPRESENTATIVES

FEBRUARY 12, 2015

Mr. TIBERI (for himself, Mr. NEAL, Mr. KIND, Mr. LARSON of Connecticut, Mr. PASCRELL, Mr. THOMPSON of California, Mr. REED, Mr. ROSKAM, Mr. YOUNG of Indiana, and Mr. BOUSTANY) introduced the following bill; which was referred to the Committee on Ways and Means

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## A BILL

To amend the Internal Revenue Code of 1986 to permanently extend the subpart F exemption for active financing income.

1 *Be it enacted by the Senate and House of Representa-*  
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. PERMANENT SUBPART F EXEMPTION FOR AC-**  
4 **TIVE FINANCING INCOME.**

5 (a) BANKING, FINANCING, OR SIMILAR BUSI-  
6 NESSES.—Section 954(h) of the Internal Revenue Code of  
7 1986 (relating to special rule for income derived in the  
8 active conduct of banking, financing, or similar busi-  
9 nesses) is amended by striking paragraph (9).

1       (b) INSURANCE BUSINESSES.—Section 953(e) of  
2 such Code (relating to exempt insurance income) is  
3 amended by striking paragraph (10) and by redesignating  
4 paragraph (11) as paragraph (10).

5       (c) EFFECTIVE DATE.—The amendments made by  
6 this section shall apply to taxable years of a foreign cor-  
7 poration beginning after December 31, 2014, and to tax-  
8 able years of United States shareholders with or within  
9 which such taxable years of such foreign corporation end.

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