

**Amendment to the Amendment in the Nature of a Substitute to Subtitle I. Budget
Reconciliation Legislative Recommendations Relating to Responsibly Funding Our Priorities
Offered by Mr. Nunes of California**

This amendment would delay GILTI changes until China enacts a global minimum tax and would prohibit the GILTI rate from increased to a rate than that in China. (The Stop Shipping Jobs to China Amendment.)

AMENDMENT

OFFERED BY Mr. Nunes

In section 138126, amend subsection (g)(2) by striking “The” and inserting “Except as provided in this subsection, the”.

In section 138126, amend subsection (g) by adding at the end the following new paragraph:

1 (3) REQUIRED CERTIFICATION.—The amend-
2 ments made by this section shall not apply to any
3 taxable year beginning before the date on which the
4 Secretary of the Treasury certifies that China has a
5 tax substantially similar to the tax established under
6 section 951A in effect. Notwithstanding any other
7 provision of law, no tax imposed under such section
8 may be imposed at a rate higher than the rate at
9 which a substantially similar tax is imposed in
10 China, as determined by such Secretary.

