

115TH CONGRESS  
1ST SESSION

**S.** \_\_\_\_\_

To amend the Internal Revenue Code of 1986 to clarify that all provisions shall apply to legally married same-sex couples in the same manner as other married couples, and for other purposes.

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IN THE SENATE OF THE UNITED STATES

Mr. WYDEN (for himself, Mr. MENENDEZ, Ms. HIRONO, Ms. BALDWIN, Ms. WARREN, Mr. WHITEHOUSE, Mrs. FEINSTEIN, Mr. BENNET, Mr. BOOKER, Mr. DURBIN, Mr. KAINE, Mr. BROWN, Mr. LEAHY, Mr. FRANKEN, Mr. HEINRICH, Mr. CASEY, Ms. CORTEZ MASTO, Mr. CARDIN, Ms. HASSAN, Mr. CARPER, Mr. VAN HOLLEN, Mr. COONS, Mrs. MCCASKILL, Mrs. MURRAY, Ms. HARRIS, Ms. STABENOW, Mr. REED, Ms. KLOBUCHAR, Mr. SANDERS, Mr. SCHUMER, Mr. BLUMENTHAL, Ms. CANTWELL, Mr. DONNELLY, Ms. DUCKWORTH, Mr. PETERS, Mr. UDALL, Mr. MARKEY, Mr. MURPHY, Ms. HEITKAMP, Mrs. SHAHEEN, Mrs. GILLIBRAND, Mr. MERKLEY, Mr. NELSON, Mr. KING, Mr. SCHATZ, Mr. WARNER, Mr. TESTER, and Mr. MANCHIN) introduced the following bill; which was read twice and referred to the Committee on

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**A BILL**

To amend the Internal Revenue Code of 1986 to clarify that all provisions shall apply to legally married same-sex couples in the same manner as other married couples, and for other purposes.

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

1 **SECTION 1. SHORT TITLE.**

2 This Act may be cited as the “Equal Dignity for Mar-  
3 ried Taxpayers Act of 2017”.

4 **SEC. 2. RULES RELATING TO ALL LEGALLY MARRIED COU-  
5 PLES.**

6 (a) IN GENERAL.—The Internal Revenue Code of  
7 1986 is amended—

8 (1) in section 21(d)(2)—

9 (A) by striking “HIMSELF” in the heading  
10 and inserting “SELF”; and

11 (B) by striking “any husband and wife”  
12 and inserting “any married couple”;

13 (2) in section 22(e)(1)—

14 (A) by striking “husband and wife who  
15 live” and inserting “married couple who lives”;  
16 and

17 (B) by striking “the taxpayer and his  
18 spouse” and inserting “the taxpayer and the  
19 spouse of the taxpayer”;

20 (3) in section 38(c)(6)(A), by striking “husband  
21 or wife who files” and inserting “married individual  
22 who files”;

23 (4) in section 42(j)(5)(C), by striking clause (i)  
24 and inserting the following new clause:

25 “(i) MARRIED COUPLE TREATED AS 1  
26 PARTNER.—For purposes of subparagraph

1 (B), individuals married to one another  
2 (and their estates) shall be treated as 1  
3 partner.”;

4 (5) in section 62(b)(3)—

5 (A) in subparagraph (A)—

6 (i) by striking “husband and wife who  
7 lived apart” and inserting “married couple  
8 who lived apart”; and

9 (ii) by striking “the taxpayer and his  
10 spouse” and inserting “the taxpayer and  
11 the spouse of the taxpayer”; and

12 (B) in subparagraph (D), by striking “hus-  
13 band and wife” and inserting “married couple”;

14 (6) in section 121—

15 (A) in subsection (b)(2), by striking “hus-  
16 band and wife who make” and inserting “mar-  
17 ried couple who makes”; and

18 (B) in subsection (d)(1), by striking “hus-  
19 band and wife make” and inserting “married  
20 couple makes”;

21 (7) in section 165(h)(4)(B), by striking “hus-  
22 band and wife” and inserting “married couple”;

23 (8) in section 179(b)(4), by striking “a husband  
24 and wife” and inserting “individuals married to one  
25 another”;

1           (9) in section 213(d)(8), by striking “status as  
2           husband and wife” and inserting “marital status”;

3           (10) in section 219(g)(4), in the matter pre-  
4           ceding subparagraph (A), by striking “A husband  
5           and wife” and inserting “Married individuals”;

6           (11) in section 274(b)(2)(B), by striking “hus-  
7           band and wife” and inserting “married couple”;

8           (12) in section 643(f), by striking “husband  
9           and wife” and inserting “married couple”;

10          (13) by striking section 682 and inserting the  
11          following new section:

12       **“SEC. 682. INCOME OF AN ESTATE OR TRUST IN CASE OF DI-**  
13                               **VORCE, ETC.**

14       “(a) INCLUSION IN GROSS INCOME OF SEPARATED  
15       INDIVIDUAL.—There shall be included in the gross income  
16       of an individual who is divorced or legally separated under  
17       a decree of divorce or of separate maintenance (or who  
18       is separated under a written separation agreement) the  
19       amount of the income of any trust which such individual  
20       is entitled to receive and which, except for this section,  
21       would be includible in the gross income of the spouse of  
22       such individual, and such amount shall not, despite any  
23       other provision of this subtitle, be includible in the gross  
24       income of such spouse. This subsection shall not apply to  
25       that part of any such income of the trust which the terms

1 of the decree, written separation agreement, or trust in-  
2 strument fix, in terms of an amount of money or a portion  
3 of such income, as a sum which is payable for the support  
4 of minor children of such spouse. In case such income is  
5 less than the amount specified in the decree, agreement,  
6 or instrument, for the purpose of applying the preceding  
7 sentence, such income, to the extent of such sum payable  
8 for such support, shall be considered a payment for such  
9 support.

10 “(b) SEPARATED INDIVIDUAL CONSIDERED BENE-  
11 FICIARY.—For purposes of computing the taxable income  
12 of the estate or trust and the taxable income of an indi-  
13 vidual to whom subsection (a) applies, such individual  
14 shall be considered as the beneficiary specified in this part.

15 “(c) SPOUSE.—For purposes of this section, if the  
16 spouses referred to are divorced, wherever appropriate to  
17 the meaning of this section, the term ‘spouse’ shall read  
18 ‘former spouse’.”;

19 (14) in section 761(f)—

20 (A) in paragraph (1), by striking “husband  
21 and wife” and inserting “married couple”; and

22 (B) in paragraph (2)(A), by striking “hus-  
23 band and wife” and inserting “married couple”;

24 (15) in section 911—

1 (A) in subsection (b)(2), by striking sub-  
2 paragraph (C) and inserting the following new  
3 subparagraph:

4 “(C) TREATMENT OF COMMUNITY IN-  
5 COME.—In applying subparagraph (A) with re-  
6 spect to amounts received from services per-  
7 formed by a married individual which are com-  
8 munity income under community property laws  
9 applicable to such income, the aggregate  
10 amount which may be excludable from the gross  
11 income of such individual and such individual’s  
12 spouse under subsection (a)(1) for any taxable  
13 year shall equal the amount which would be so  
14 excludable if such amounts did not constitute  
15 community income.”; and

16 (B) in subsection (d)(9)(A), by striking  
17 “where a husband and wife each have” and in-  
18 serting “where both spouses have”;

19 (16) in section 1244(b)(2), by striking “a hus-  
20 band and wife filing”;

21 (17) in section 1272(a)(2)(E), by striking  
22 clause (iii) and inserting the following new clause:

23 “(iii) TREATMENT OF A MARRIED  
24 COUPLE.—For purposes of this subpara-  
25 graph, a married couple shall be treated as

1           1 person. The preceding sentence shall not  
2           apply where the spouses lived apart at all  
3           times during the taxable year in which the  
4           loan is made.”;

5           (18) in section 1313(c)(1), by striking “hus-  
6           band and wife” and inserting “an individual and the  
7           individual’s spouse”;

8           (19) in section 1361(e)(1)(A)(i), by striking “a  
9           husband and wife” and inserting “individuals mar-  
10          ried to one another”;

11          (20) in section 2040(b), by striking “CERTAIN  
12          JOINT INTERESTS OF A HUSBAND AND WIFE” in  
13          the heading and inserting “CERTAIN JOINT INTER-  
14          ESTS OF A MARRIED COUPLE”;

15          (21) in section 2513—

16                (A) by striking “**GIFT BY HUSBAND OR**  
17                **WIFE TO THIRD PARTY**” in the heading and  
18                inserting “**GIFT BY SPOUSE TO THIRD**  
19                **PARTY**”; and

20                (B) by striking paragraph (1) of sub-  
21                section (a) and inserting the following new  
22                paragraph:

23                “(1) IN GENERAL.—A gift made by one indi-  
24                vidual to any person other than such individual’s  
25                spouse shall, for the purposes of this chapter, be

1 considered as made one-half by the individual and  
2 one-half by such individual's spouse, but only if at  
3 the time of the gift each spouse is a citizen or resi-  
4 dent of the United States. This paragraph shall not  
5 apply with respect to a gift by an individual of an  
6 interest in property if such individual creates in the  
7 individual's spouse a general power of appointment,  
8 as defined in section 2514(c), over such interest. For  
9 purposes of this section, an individual shall be con-  
10 sidered as the spouse of another only if the indi-  
11 vidual is married to the individual's spouse at the  
12 time of the gift and does not remarry during the re-  
13 mainder of the calendar year.”;

14 (22) in section 2516—

15 (A) by striking “Where a husband and  
16 wife enter” and inserting the following:

17 “(a) IN GENERAL.—Where a married couple enters”;

18 and

19 (B) by adding at the end the following new  
20 subsection:

21 “(b) SPOUSE.—For purposes of this section, if the  
22 spouses referred to are divorced, wherever appropriate to  
23 the meaning of this section, the term ‘spouse’ shall read  
24 ‘former spouse’.”;



1 (23) in section 5733(d)(2), by striking “hus-  
2 band or wife” and inserting “married individual”;

3 (24) in section 6013—

4 (A) by striking “**JOINT RETURNS OF IN-**  
5 **COME TAX BY HUSBAND AND WIFE**” in the  
6 heading and inserting “**JOINT RETURNS OF**  
7 **INCOME TAX BY A MARRIED COUPLE**”;

8 (B) in subsection (a), in the matter pre-  
9 ceeding paragraph (1), by striking “husband and  
10 wife” and inserting “married couple”;

11 (C) in subsection (a)(1), by striking “ei-  
12 ther the husband or wife” and inserting “either  
13 spouse”;

14 (D) in subsection (a)(2)—

15 (i) in the first sentence, by striking  
16 “husband and wife” and inserting  
17 “spouses”; and

18 (ii) in the second sentence, by striking  
19 “his taxable year” and inserting “such  
20 spouse’s taxable year”;

21 (E) in subsection (a)(3)—

22 (i) in the first sentence, by striking  
23 “his executor or administrator” and insert-  
24 ing “the decedent’s executor or adminis-  
25 trator”;

1 (ii) in the first sentence, by striking  
2 “with respect to both himself and the dece-  
3 dent” and inserting “with respect to both  
4 the surviving spouse and the decedent”;  
5 and

6 (iii) in the second sentence, by strik-  
7 ing “constitute his separate return” and  
8 inserting “constitute the survivor’s sepa-  
9 rate return”;

10 (F) in subsection (b), by striking para-  
11 graph (1) and inserting the following new para-  
12 graph:

13 “(1) IN GENERAL.—Except as provided in para-  
14 graph (2), if an individual has filed a separate re-  
15 turn for a taxable year for which a joint return  
16 could have been made by the individual and the indi-  
17 vidual’s spouse under subsection (a) and the time  
18 prescribed by law for filing the return for such tax-  
19 able year has expired, such individual and such  
20 spouse may nevertheless make a joint return for  
21 such taxable year. A joint return filed under this  
22 subsection shall constitute the return of the indi-  
23 vidual and the individual’s spouse for such taxable  
24 year, and all payments, credits, refunds, or other re-  
25 payments made or allowed with respect to the sepa-

1 rate return of either spouse for such taxable year  
2 shall be taken into account in determining the extent  
3 to which the tax based upon the joint return has  
4 been paid. If a joint return is made under this sub-  
5 section, any election (other than the election to file  
6 a separate return) made by either spouse in a sepa-  
7 rate return for such taxable year with respect to the  
8 treatment of any income, deduction, or credit of  
9 such spouse shall not be changed in the making of  
10 the joint return where such election would have been  
11 irrevocable if the joint return had not been made. If  
12 a joint return is made under this subsection after  
13 the death of either spouse, such return with respect  
14 to the decedent can be made only by the decedent's  
15 executor or administrator.”;

16 (G) in subsection (c), by striking “husband  
17 and wife” and inserting “spouses”;

18 (H) in subsection (d)(1), by striking “sta-  
19 tus as husband and wife” and inserting “the  
20 marital status with respect to each other”;

21 (I) in subsection (d)(2), by striking “his  
22 spouse” and inserting “the spouse of the indi-  
23 vidual”;

24 (J) in subsection (f)(2)(B), by striking  
25 “such individual, his spouse, and his estate

1 shall be determined as if he were alive” and in-  
2 serting “such individual, as well as of the  
3 spouse and estate of the individual, shall be de-  
4 termined as if the individual were alive”; and

5 (K) in subsection (f)(3)—

6 (i) in subparagraph (A), by striking  
7 “for which he is entitled” and inserting  
8 “for which such member is entitled”; and

9 (ii) in subparagraph (B), by striking  
10 “for which he is entitled” and inserting  
11 “for which such employee is entitled”;

12 (25) in section 6014(b), by striking “husband  
13 and wife” and inserting “a married couple”;

14 (26) in section 6017, by striking “husband and  
15 wife” and inserting “married couple”;

16 (27) in section 6096(a), by striking “of hus-  
17 band and wife having” and insert “reporting”;

18 (28) in section 6166(b)(2), by striking subpara-  
19 graph (B) and inserting the following new subpara-  
20 graph:

21 “(B) CERTAIN INTERESTS HELD BY MAR-  
22 RIED COUPLE.—Stock or a partnership interest  
23 which—

24 “(i) is community property of a mar-  
25 ried couple (or the income from which is

1 community income) under the applicable  
2 community property law of a State, or

3 “(ii) is held by a married couple as  
4 joint tenants, tenants by the entirety, or  
5 tenants in common,

6 shall be treated as owned by 1 shareholder or  
7 1 partner, as the case may be.”;

8 (29) in section 6212(b)(2)—

9 (A) by striking “return filed by husband  
10 and wife” and inserting “return”; and

11 (B) by striking “his last known address”  
12 and inserting “the last known address of such  
13 spouse”;

14 (30) in section 7428(c)(2)(A), by striking “hus-  
15 band and wife” and inserting “married couple”;

16 (31) in section 7701(a)—

17 (A) by striking paragraph (17); and

18 (B) in paragraph (38), by striking “hus-  
19 band and wife” and inserting “married couple”;  
20 and

21 (32) in section 7872(f), by striking paragraph  
22 (7) and inserting the following new paragraph:

23 “(7) MARRIED COUPLE TREATED AS 1 PER-  
24 SON.—A married couple shall be treated as 1 per-  
25 son.”.

1 (b) CONFORMING AMENDMENTS.—

2 (1) The table of sections for subchapter B of  
3 chapter 12 of the Internal Revenue Code of 1986 is  
4 amended by striking the item relating to section  
5 2513 and inserting the following new item:

“Sec. 2513. Gift by spouse to third party.”.

6 (2) The table of sections for subpart B of part  
7 II of subchapter A of chapter 61 of such Code is  
8 amended by striking the item relating to section  
9 6013 and inserting the following new item:

“Sec. 6013. Joint returns of income tax by a married couple.”.

10 **SEC. 3. RULES RELATING TO THE GENDER OF SPOUSES,**  
11 **ETC.**

12 (a) IN GENERAL.—The following provisions of the In-  
13 ternal Revenue Code of 1986 are each amended by strik-  
14 ing “his spouse” each place it appears and inserting “the  
15 individual’s spouse”:

16 (1) Subsections (a)(1) and (d) of section 1.

17 (2) Section 2(b)(2)(A).

18 (3) Subsections (d)(1)(B) and (e)(3) of section  
19 21.

20 (4) Section 36(c)(5).

21 (5) Section 71(b)(1)(C).

22 (6) Section 179(d)(2)(A).

23 (7) Section 318(a)(1)(A)(i).

24 (8) Section 408(d)(6).

1 (9) Section 469(i)(5)(B)(ii).

2 (10) Section 507(d)(2)(B)(iii).

3 (11) Clauses (ii) and (iii) of section  
4 613A(c)(8)(D).

5 (12) Section 672(e)(2).

6 (13) Section 704(e)(2).

7 (14) Subparagraphs (A) and (B)(ii) of section  
8 911(c)(3).

9 (15) Section 1235(c)(2).

10 (16) Section 1400C(e)(2)(A)(i).

11 (17) Section 1563(e)(5).

12 (18) Section 3121(b)(3)(B).

13 (19) Section 4946(d).

14 (20) Section 4975(e)(6).

15 (21) Subparagraphs (A)(iv) and (B) of section  
16 6012(a)(1).

17 (22) Section 7703(a).

18 (b) CONFORMING AMENDMENTS.—

19 (1) The following provisions of the Internal  
20 Revenue Code of 1986 are each amended by striking  
21 “his spouse” each place it appears and inserting  
22 “the taxpayer’s spouse”:

23 (A) Section 2(a)(2)(B).

24 (B) Subparagraphs (B) and (C) of section  
25 2(b)(2).

1 (C) Paragraphs (2) and (6) of section  
2 21(e).

3 (D) Section 36B(e)(1).

4 (E) Section 63(e)(3)(B).

5 (F) Section 86(c)(1)(C)(ii).

6 (G) Section 105(c)(1).

7 (H) Section 135(d)(3).

8 (I) Section 151(b).

9 (J) Subsections (a) and (d)(7) of section  
10 213.

11 (K) Section 1233(e)(2)(C).

12 (L) Section 1239(b)(2).

13 (M) Section 6504(2).

14 (2) The following provisions of the Internal  
15 Revenue Code of 1986 are each amended by striking  
16 “his spouse” each place it appears and inserting  
17 “the employee’s spouse”:

18 (A) Section 132(m)(1).

19 (B) Section 401(h)(6).

20 (C) Subparagraphs (B), (D), and (E)(i) of  
21 section 3402(f)(1).

22 (D) Section 3402(l)(3).

23 (3) The following provisions of the Internal  
24 Revenue Code of 1986 are each amended by striking



1 “his taxable year” each place it appears and insert-  
2 ing “the individual’s taxable year”:

3 (A) Section 2(b)(1).

4 (B) Section 7703(a)(1).

5 (4) The following provisions of the Internal  
6 Revenue Code of 1986 are each amended by striking  
7 “his taxable year” each place it appears and insert-  
8 ing “the taxpayer’s taxable year”:

9 (A) Subparagraphs (B) and (C) of section  
10 2(b)(2) (as amended by paragraph (1)(B)).

11 (B) Section 63(f)(1)(A).

12 (5) The following provisions of the Internal  
13 Revenue Code of 1986 are each amended by striking  
14 “his home” and inserting “the individual’s home”:

15 (A) Section 2(b)(1)(A).

16 (B) Section 21(e)(4)(A)(i).

17 (C) Section 7703(b)(1).

18 (6) The Internal Revenue Code of 1986, as  
19 amended by this section, is amended—

20 (A) in section 2(a)(1)(A), by striking “his  
21 two taxable years” and inserting “the tax-  
22 payer’s two taxable years”;

23 (B) in section 2(a)(1)(B), by striking “his  
24 home” and inserting “the taxpayer’s home”;

1 (C) in paragraphs (1)(A) and (2)(A) of  
2 section 63(f), by striking “for himself if he”  
3 both places it appears and inserting “for the  
4 taxpayer if the taxpayer”;

5 (D) in section 63(f)(4), by striking “his”  
6 both places it appears and inserting “the indi-  
7 vidual’s”;

8 (E) in section 105(b)—

9 (i) by striking “his spouse, his de-  
10 pendants” and inserting “the taxpayer’s  
11 spouse, the taxpayer’s dependents”; and

12 (ii) by striking “by him”;

13 (F) in the heading of section 119(a), by  
14 striking “, HIS SPOUSE, AND HIS DEPEND-  
15 ENTS” and inserting “AND THE EMPLOYEE’S  
16 SPOUSE AND DEPENDENTS”;

17 (G) in section 119(a), by striking “him, his  
18 spouse, or any of his dependents by or on be-  
19 half of his employer” and inserting “the em-  
20 ployee or the employee’s spouse or dependents  
21 by or on behalf of the employer of the em-  
22 ployee”;

23 (H) in section 119(a)(2), by striking “his”  
24 both places it appears and inserting “the em-  
25 ployee’s”;

1 (I) in section 119(d)(3)(B), by striking  
2 “his spouse, and any of his dependents” and in-  
3 sserting “the employee’s spouse, and any of the  
4 employee’s dependents”;

5 (J) in section 129(b)(2), by striking “him-  
6 self” and inserting “the spouse’s self”;

7 (K) in section 170(b)(1)(F)(iii)—

8 (i) by striking “his spouse” and in-  
9 sserting “the spouse of such donor”; and

10 (ii) by striking “his death or after the  
11 death of his surviving spouse” and insert-  
12 ing “the death of the donor or after the  
13 death of the donor’s surviving spouse”;

14 (L) in section 213(e)(1)—

15 (i) by striking “his estate” and insert-  
16 ing “the estate of the taxpayer”; and

17 (ii) by striking “his death” and insert-  
18 ing “the death of the taxpayer”;

19 (M) in section 213(d)(7), by striking “he”  
20 and inserting “the taxpayer”;

21 (N) in section 217(g)—

22 (i) by striking “, his spouse, or his de-  
23 pendents” in paragraph (2) and inserting  
24 “or the spouse or dependents of such mem-  
25 ber”;

1 (ii) by striking “his dependents” in  
2 paragraph (3) and inserting “dependents”;  
3 and

4 (iii) by striking “his spouse” each  
5 place it appears in paragraph (3) and in-  
6 serting “the member’s spouse”;

7 (O) in section 217(i)(3)(A), by striking  
8 “his”;

9 (P) in section 267(c), by striking “his”  
10 each place it appears and inserting “the individ-  
11 ual’s”;

12 (Q) in section 318(a)(1)(A)(ii), by striking  
13 “his” and inserting “the individual’s”;

14 (R) in section 402(l)(4)(D), by striking “,  
15 his spouse, and dependents” and inserting “and  
16 the spouse and dependents of such officer”;

17 (S) in section 415(l)(2)(B), by striking “,  
18 his spouse, or his dependents” and inserting  
19 “or the participant’s spouse or dependents”;

20 (T) in section 420(f)(6)(A), by striking  
21 “his covered spouse and dependents” each place  
22 it appears and inserting “the covered spouse  
23 and dependents of such retiree”;

24 (U) in section 424(d)(1), by striking “his”  
25 and inserting “the individual’s”;

1 (V) in section 544(a)(2), by striking “his”  
2 each place it appears and inserting “the individ-  
3 ual’s”;

4 (W) in section 911(c)(3), by striking  
5 “him” each place it appears in subparagraphs  
6 (A) and (B)(ii) and inserting “the individual”;

7 (X) in section 1015(d)(3), by striking “his  
8 spouse” and inserting “the donor’s spouse”;

9 (Y) in section 1563(e)—

10 (i) by striking “his children” both  
11 places it appears in paragraphs (5)(D) and  
12 (6)(A) and inserting “the individual’s chil-  
13 dren”; and

14 (ii) by striking “his parents” both  
15 places it appears in subparagraphs (A) and  
16 (B) of paragraph (6) and inserting “the  
17 individual’s parents”;

18 (Z) in section 1563(f)(2)(B), by striking  
19 “him” and inserting “the individual”;

20 (AA) in section 2012(e), by striking “his  
21 spouse” and inserting “the decedent’s spouse”;

22 (BB) in section 2032A(e)(10), by striking  
23 “his surviving spouse” and inserting “the dece-  
24 dent’s surviving spouse”;

25 (CC) in section 2035(b)—

1 (i) by striking “his estate” and insert-  
2 ing “the decedent’s estate”; and

3 (ii) by striking “his spouse” and in-  
4 sserting “the decedent’s spouse”;

5 (DD) in subsections (a) and (b)(5) of sec-  
6 tion 2056, by striking “his”;

7 (EE) in section 2523(b)—

8 (i) by striking “(or his heirs or as-  
9 signs) or such person (or his heirs or as-  
10 signs)” in paragraph (1) and inserting  
11 “(or the donor’s heirs or assigns) or such  
12 person (or such person’s heirs or assigns)”;

13 (ii) by striking “himself” in para-  
14 graph (1) and inserting “the donor’s self”;

15 (iii) by striking “he” in paragraph (2)  
16 and inserting “the donor”; and

17 (iv) by striking “him” each place it  
18 appears in the matter following paragraph  
19 (2) and inserting “the donor”;

20 (FF) in section 2523(d), by striking “him-  
21 self” and inserting “the donor’s self”;

22 (GG) in section 2523(e), by striking “his  
23 spouse” and inserting “the donor’s spouse”;

24 (HH) in section 3121(b)(3)—

1 (i) by striking “his father” in sub-  
2 paragraph (A) and inserting “the child’s  
3 father”;

4 (ii) by striking “his father” in sub-  
5 paragraph (B) and inserting “the individ-  
6 ual’s father”; and

7 (iii) by striking “his son” in subpara-  
8 graph (B) and inserting “the individual’s  
9 son”;

10 (II) in section 3306(c)(5)—

11 (i) by striking “his son” and inserting  
12 “the individual’s son”; and

13 (ii) by striking “his father” and in-  
14 serting “the child’s father”;

15 (JJ) in section 3402(f)(1)—

16 (i) by striking “himself unless he” in  
17 subparagraph (A) and inserting “the em-  
18 ployee unless the employee”;

19 (ii) by striking “he” in subparagraph  
20 (D) and inserting “the employee”; and

21 (iii) by striking “he” both places it  
22 appears in subparagraph (E) and inserting  
23 “the employee”;

24 (KK) in section 3402(l)—

1 (i) by striking “he” each place it ap-  
2 pears in paragraphs (2) and (3)(A) and in-  
3 serting “the employee”; and

4 (ii) by striking “his taxable year”  
5 both places it appears in paragraph (3)(B)  
6 and inserting “the employee’s taxable  
7 year”;

8 (LL) in section 4905(a), by striking “his  
9 spouse” and inserting “such person’s spouse”;

10 (MM) in section 6046(c), by striking “his”  
11 both places it appears and inserting “the indi-  
12 vidual’s”;

13 (NN) in section 6103(e)(1)(A)(ii), by strik-  
14 ing “him” and inserting “the individual”;

15 (OO) in section 7448(a)(8), by striking  
16 “his death” and inserting “the individual’s  
17 death”;

18 (PP) in subsections (d), (m), and (n) of  
19 section 7448, by striking “his” each place it ap-  
20 pears and inserting “the individual’s”;

21 (QQ) in subsection (m) of section 7448, as  
22 so amended, by striking “he” each place it ap-  
23 pears and inserting “such judge or special trial  
24 judge”; and

25 (RR) in section 7448(q)—



- 1 (i) by striking “his” both places it ap-
- 2 pears and inserting “such judge’s”; and
- 3 (ii) by striking “to bring himself” and
- 4 inserting “to come”.