

**AMENDMENT TO THE SENATE AMENDMENT TO
H.R. 5371
OFFERED BY MS. TITUS OF NEVADA**

Add at the end the following:

**1 DIVISION I—RESTORATION OF
2 LIMITATION ON WAGERING
3 LOSSES**

**4 SEC. 9001. RESTORATION OF LIMITATION ON WAGERING
5 LOSSES.**

6 (a) IN GENERAL.—Section 165(d) of the Internal
7 Revenue Code of 1986 is amended by striking “90 per-
8 cent” and inserting “100 percent”.

9 (b) EFFECTIVE DATE.—The amendment made by
10 this section shall apply to taxable years beginning after
11 December 31, 2025.

