

**AMENDMENT IN THE NATURE OF A SUBSTITUTE  
TO H.R. 8292  
OFFERED BY MR. SMITH OF MISSOURI**

Strike all after the enacting clause and insert the following:

**1 SECTION 1. SHORT TITLE.**

2 This Act may be cited as the “Taxpayer Data Protec-  
3 tion Act”.

**4 SEC. 2. INCREASE IN PENALTIES FOR UNAUTHORIZED DIS-  
5 CLOSURES OF TAXPAYER INFORMATION.**

6 (a) IN GENERAL.—Paragraphs (1), (2), (3), (4), and  
7 (5) of section 7213(a) of the Internal Revenue Code of  
8 1986 are each amended by striking “\$5,000, or imprison-  
9 ment of not more than 5 years” and inserting “\$250,000,  
10 or imprisonment of not more than 10 years”.

11 (b) DISCLOSURES OF RETURN INFORMATION OF  
12 MULTIPLE TAXPAYERS TREATED AS MULTIPLE VIOLA-  
13 TIONS.—Section 7213(a) of such Code is amended by add-  
14 ing at the end the following new paragraph:

15 “(6) DISCLOSURES OF RETURN INFORMATION  
16 OF MULTIPLE TAXPAYERS TREATED AS MULTIPLE  
17 VIOLATIONS.—For purposes of paragraphs (1), (2),  
18 (3), (4), and (5), a separate violation occurs with re-

1       spect to each taxpayer whose return or return infor-  
2       mation is disclosed in violation of any such para-  
3       graph.”.

4       (c) EFFECTIVE DATE.—The amendments made by  
5 this section shall apply to disclosures made after the date  
6 of the enactment of this Act.

