

119TH CONGRESS
2D SESSION

S. 327

AN ACT

To amend the Internal Revenue Code of 1986 to deny any foreign tax credit or deduction with respect to taxes paid or accrued to the Russian Federation.

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 “Hindering Oppressive
3 Nations from Obtaining Revenue Act” or “HONOR Act”.

4 **SEC. 2. DENIAL OF FOREIGN TAX CREDIT WITH RESPECT**
5 **TO THE RUSSIAN FEDERATION.**

6 (a) IN GENERAL.—Section 901(j)(2) of the Internal
7 Revenue Code of 1986 is amended by adding at the end
8 the following new subparagraph:

9 “(C) SPECIAL RULE FOR RUSSIA.—

10 “(i) IN GENERAL.—This subsection
11 shall apply to the Russian Federation dur-
12 ing the period described in clause (ii).

13 “(ii) PERIOD OF APPLICATION.—The
14 period described in this clause with respect
15 to any country is the period—

16 “(I) beginning on the date that is
17 30 days after the date of the enact-
18 ment of this subparagraph, and

19 “(II) ending on the date on
20 which the resumption of the applica-
21 tion of the rates of duty set forth in
22 column 1 of the Harmonized Tariff
23 Schedule of the United States to
24 products of that country takes effect
25 pursuant to section 4(b) of the Sus-

1 pending Normal Trade Relations with
2 Russia and Belarus Act.”.

3 (b) DEDUCTION DENIED.—Section 901(j)(3) of such
4 Code is amended by adding at the end the following new
5 sentence: “The preceding sentence shall not apply to any
6 tax of any country to which paragraph (2)(C) applies.”.

7 (c) EFFECTIVE DATES.—

8 (1) IN GENERAL.—Except as provided in para-
9 graph (2), the amendments made by this section
10 shall take effect on the date of the enactment of this
11 Act.

12 (2) DEDUCTION LIMITATION.—The amendment
13 made by subsection (b) shall apply to taxes paid or
14 accrued (or deemed paid or accrued under section
15 960 of the Internal Revenue Code of 1986) after the
16 date that is 90 days after the date of the enactment
17 of this Act.

18 (3) NONAPPLICATION OF TREATY RULES.—This
19 section and the amendments made by this section

- 1 shall be applied without regard to any treaty obliga-
- 2 tion of the United States.

Passed the Senate March 10, 2026.

Attest:

Secretary.

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