120TH CONGRESS • 1ST SESSION • H. R. 180

A BILL

To provide for reconciliation pursuant to title II of the concurrent resolution on the budget for fiscal year 2027 (H. Con. Res. 1), to enact refundable primary-residence and personal-vehicle property tax credits and working-family payroll tax credits, to establish an Office of Public Integrity Tax Administration under joint legislative oversight, to modernize tax-exempt foundation payout and endowment alignment standards, and to authorize United States Median-Wage Indexed Treasury Obligations.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE; TABLE OF TITLES; RECONCILIATION COMPLIANCE.

(a) Short Title.—This Act may be cited as the **"180-Day American Solvency and Living Floor Act of 2027"**.

(b) Budget Reconciliation Compliance (2 U.S.C. § 644).—Every provision of this Act is enacted as a revenue measure, differential tax rate schedule, tax credit, trust-fund disbursement formula, or public-debt instrument under Title 26 and Title 31 of the United States Code producing a direct, non-incidental outlay or revenue effect within the 10-year budget window.

TITLE I—FEDERAL FIDUCIARY PORTFOLIO STANDARDS AND PUBLIC INTEGRITY TAX ADMINISTRATION

SEC. 101. TAX-DEFERRED ROLLOVER OF PUBLIC OFFICIAL PORTFOLIOS INTO SERIES O-MWIB OBLIGATIONS; EXCISE TAX ON NON-QUALIFYING EQUITY HOLDINGS (26 U.S.C. §§ 1043(d), 4980I).

(a) Zero-Tax Portfolio Rollover Safe Harbor (26 U.S.C. § 1043(d)).—Any Member of Congress, the President, the Vice President, any Executive Schedule Level I–V officer, any Article III Federal Judge, or any Federal Reserve Governor or Regional Bank President (including spouses and dependent trusts) who divests individual corporate equities, sector derivatives, private-equity interests, or non-resident commercial real estate within 60 days of taking office (or enactment) and reinvests the proceeds into non-marketable **Series O-MWIB Median-Wage Indexed Treasury Obligations** issued under 31 U.S.C. § 3102A(b)(2) shall recognize zero capital-gains tax upon rollover. Series O-MWIB obligations pay a quarterly yield equal to net real United States median wage growth relative to primary shelter and residential utility costs, and **yield 0.00 percent interest** in any calendar quarter in which CPI-U inflation or shelter/utility cost growth exceeds median hourly wage growth.

> **(b) Standard Excise Schedule on Non-Divested Holdings (26 U.S.C. § 4980I).**—Chapter 43 of the Internal Revenue Code of 1986 is amended by adding section 4980I, imposing an annual excise tax equal to **50 percent of the fair market value** on any covered individual corporate stock or disqualified asset retained outside the subsection (a) rollover safe harbor more than 60 days after taking office.

SEC. 102. POST-EMPLOYMENT LOBBYING AND FOREIGN-REPRESENTATION COMPENSATION EXCISE TAX (26 U.S.C. § 4980J).

Chapter 43 of the Internal Revenue Code of 1986 is further amended by adding section 4980J, imposing on any former covered official (for a 10-year post-service cooling-off period) and on any paying corporate or foreign principal an excise tax equal to **100 percent of any compensation, board fee, speaking fee, carried interest, deferred equity, or unapproved foreign payment** derived from federal lobbying contacts, foreign-principal representation (FARA), or regulatory advocacy before the United States Government.

SEC. 103. MANDATORY WHISTLEBLOWER AWARDS AND VOLUNTARY DISCLOSURE SAFE HARBOR (26 U.S.C. § 7623(b)(7)).

Section 7623(b) of the Internal Revenue Code of 1986 is amended to provide a mandatory, non-discretionary award of **25 percent of collected proceeds** (paid free of income tax within 60 days of collection) to any individual—including any foundation administrator, financial officer, trustee, or compliance employee—who furnishes original documentation leading to revenue recovery under sections 4980I, 4980J, 4491, 4493, 4494, 4495, 4949, or 7656(g). Any non-principal participant who voluntarily discloses a multi-party transaction prior to audit notice receives **100 percent administrative penalty relief**.

SEC. 104. OFFICE OF PUBLIC INTEGRITY TAX ADMINISTRATION; JOINT LEGISLATIVE OVERSIGHT AND ADMINISTRATIVE SUMMONS PROCEDURES (26 U.S.C. § 7656(g)).

Section 7656 of the Internal Revenue Code of 1986 is amended by adding subsection (g), establishing within the Internal Revenue Service an autonomous **Office of Public Integrity Tax Administration** operating under the joint appointment, budget certification, and oversight authority of the **Comptroller General of the United States (Government Accountability Office)** and the **Joint Committee on Taxation (26 U.S.C. § 8022)**.

> **(1) Routine Annual Net-Worth & Federal Contractor Reconciliations.**—To ensure uniform tax administration across public offices and large federal contracts, the Office shall conduct standard annual net-worth, beneficial-ownership, and tax-reconciliation examinations of the President, the Vice President, Cabinet Secretaries, Executive Schedule appointees, their associated family LLCs, trusts, foundations, Donor-Advised Funds, and digital-asset accounts, as well as any Department of Defense or Executive agency contractor receiving more than $10,000,000 in annual federal obligations within an agency that has not obtained an unqualified annual financial statement audit.

> **(2) Direct Judicial Summons & Collection Administration (28 U.S.C. § 516 Exception).**—To prevent conflicts of interest in examinations involving Executive Branch officers or contractors, the Special Counsel of the Office is authorized (notwithstanding 28 U.S.C. § 516) to issue administrative summonses under 26 U.S.C. § 7602, execute collection levies under 26 U.S.C. § 6331, and file civil enforcement proceedings directly in the three-judge United States District Court for the District of Columbia without requiring Department of Justice referral. Tax, banking, trust, foundation, and federal procurement ledgers required for tax reconciliation under this subsection are not subject to withholding under claims of executive privilege. Any unreconciled net-worth variance, unapproved foreign payment, or unsubstantiated contractor disbursement lacking documentary proof of performance within 60 days is assessed at a **100 percent Tax Reconciliation Recapture Rate** (plus applicable section 6663 additions).

TITLE II—HOMEOWNER & PERSONAL VEHICLE PROPERTY TAX CREDITS, GENERAL REVENUE SHARING, AND MAIN STREET MORTGAGE RATE REDUCTION

SEC. 201. 100 PERCENT REFUNDABLE PRIMARY-RESIDENCE HOMESTEAD AND PERSONAL VEHICLE PROPERTY TAX CREDIT (26 U.S.C. § 36D).

Subpart C of part IV of subchapter A of chapter 1 of the Internal Revenue Code of 1986 is amended by inserting section 36D, granting every resident citizen household an automated, 100 percent refundable tax credit (settled directly between the U.S. Treasury and the local taxing authority or mortgage escrow servicer) equal to:

> **(1) Primary Family Residence ($0 Escrow).**—100 percent of annual state, county, municipal, and school-district ad valorem real property taxes assessed on the taxpayer's principal residence up to the greater of 125 percent of the regional median home value or $750,000 (indexed for inflation); plus

> **(2) Up to Two Household Motor Vehicles ($150,000/Vehicle Cap).**—100 percent of annual state or local personal property, ad valorem, or recurring value-based registration excise taxes on up to 2 motor vehicles per household up to an assessed value of **$150,000 per vehicle** (indexed for inflation). Participating jurisdictions shall not impose DMV registration holds on covered vehicles.

SEC. 202. AUTOMATED 100 PERCENT HOLD-HARMLESS FEDERAL GENERAL REVENUE SHARING (GRS) TRUST FUND AND MUNICIPAL AUDIT PANELS (26 U.S.C. § 9512).

Subchapter A of chapter 98 of the Internal Revenue Code of 1986 is amended by adding section 9512, creating the **General Revenue Sharing and Municipal Solvency Trust Fund**, funded by 100 percent of revenues from sections 4491, 4493, 4494, 4495, and 4949. On the first business day of each calendar quarter, the Bureau of the Fiscal Service shall transfer directly to every participating county, city, town, and school district an automated payment equal to the **greater of** the Inverse-Per-Capita-Income Formula or a **100 Percent Hold-Harmless Baseline Floor** (100 percent of FY2026 primary-homestead and personal-vehicle property tax collections adjusted annually by CPI-U + population growth).

> **(b) Mandatory Statutory Outlay; 36-Month Local IT Modernization Grant; 12-Citizen Municipal Audit Panels.—**GRS Trust Fund disbursements are mandatory statutory outlays not subject to administrative apportionment, deferral, or withholding under 2 U.S.C. § 681. The Trust Fund provides a 100 percent federally funded 36-month local Assessor/DMV software modernization grant. Each recipient county shall convene a randomly selected **12-Citizen Municipal Audit Panel** (supported by the 5 percent Public Administration Compute Reserve under § 4494(b)(6)) to review local procurement contracts and verify community operating charities.

SEC. 203. -3.0 PERCENT MAIN STREET MORTGAGE & SMALL-BUSINESS LOAN CREDIT, $0 PMI GUARANTEE, $18,000 HOMEBUYER CREDIT, AND 180-DAY HOMEOWNERSHIP SALE EXCLUSION (26 U.S.C. §§ 45BB, 36F, 4493).

(a) -3.0% (-300 bps) Main Street Lender Rate-Reduction Tax Credit & $0 PMI Guarantee (26 U.S.C. § 45BB).—Community banks, credit unions, and mortgage lenders receive a dollar-for-dollar quarterly tax credit equal to a **3.00 percentage-point (-300 basis points) annual interest rate reduction** passed through directly to the borrower on: (1) 30-year fixed-rate primary-residence mortgages (up to the conforming limit), and (2) domestic small-business, agricultural, and manufacturing operating or equipment loans up to $2,500,000. All covered primary-residence mortgages carry an automated 100 percent Federal GRS Trust Fund principal guarantee, **eliminating borrower-paid Private Mortgage Insurance ($0.00 PMI)**.

(b) $18,000 Homebuyer Escrow Credit & Standardized Settlement Fee Rules (26 U.S.C. § 36F).—First-time and working-family homebuyers receive an advanceable **$18,000 tax credit** at settlement. Institutional lender, title, and administrative origination fees are capped at 1.0 percent ($2,500 maximum), while **freely negotiated real estate agent commissions remain 100 percent uncapped**, subject to a direct-compensation rule requiring brokerages and platforms to disburse at least **85 percent of gross commission directly to the licensed human real estate agent**.

(c) 180-Day Capital Gains Exclusion for Single-Family Homeownership Sales; Institutional Portfolio Excise Tax (26 U.S.C. § 4493).—Any institutional entity, REIT, or controlled corporate group holding more than 10 single-family residential properties qualifies for a **100 percent federal capital-gains tax exclusion** on any single-family home sold within **180 days** after enactment if the disposition is completed through: (1) a direct sale to an owner-occupant family, (2) a **Zero-Down Sitting-Tenant Rent-to-Own Contract** (crediting 100 percent of the tenant's prior 36 months of rent toward principal at a -3.0% § 45BB interest rate), or (3) a bulk portfolio sale to a public housing authority or Community Land Trust (where the institutional seller pays 100 percent of closing costs and a minimum 2.5 percent / $7,500 commission floor per side to licensed real estate agents). Single-family units retained in an institutional portfolio (>10 homes) after the 180-day tax-free transition window are subject to an ongoing **Institutional Portfolio Excise Tax of $50 per day per unit** ($100/day in Year 2; $250/day in Year 3+), paired with a 35 percent excess land-capitalization mortgage origination excise (§ 4493A, with a 100% grandfather exemption for existing individual homeowners).

TITLE III—WORKING FAMILIES TAX RELIEF, CAPITAL MARKETS REVENUE MODERNIZATION, AND FOUNDATION PAYOUT STANDARDS

SEC. 301. WORKING WAGE PAYROLL TAX CREDIT (+7.65% PAYCHECK INCREASE), $200K/$400K STANDARD DEDUCTION, WORKING FAMILIES FRESH-START, AND UNIFORM PENALTY ADMINISTRATION (26 U.S.C. §§ 36E, 63, 7656(f)).

(a) Working Wage Payroll Tax Credit (+7.65% Paycheck Increase in 30 Days).—Enacts a 100 percent automated payroll-withholding tax credit (`26 U.S.C. § 36E / § 3513`) offsetting employee FICA/Medicare payroll tax deductions on wages up to $200,000 single / $400,000 joint (delivering an immediate **+7.65 percent take-home paycheck increase**) and offsetting matching employer payroll taxes on the first $25,000,000 of annual domestic payroll per employer, while directing the U.S. Treasury General Fund to execute automatic daily 100 percent hold-harmless transfers into the Social Security (OASI/DI) and Medicare (HI) Trust Funds.

(b) $200,000 / $400,000 Standard Deduction & Simplified Return-Free Filing.—Increases the basic standard deduction (`26 U.S.C. § 63(c)(8)`) to **$200,000 (Single)**, **$300,000 (Head of Household)**, and **$400,000 (Married Filing Jointly)**, indexed to the National Average Wage Index, with automatic Return-Free Filing (`§ 6012(a)(10)`) for wage and retirement households below those thresholds.

(c) Working Families Tax Fresh-Start Abatement & Uniform Penalty Administration Standard (26 U.S.C. § 7656(f)(2)).—Abates pre-existing income and self-employment tax arrears, civil additions, and liens for natural persons below the $200k/$400k threshold (and refunds late penalties paid over the prior 3 years by compliant working taxpayers), reallocates 100 percent of freed IRS examination personnel to $1,000,000+ non-filer and complex partnership examinations, and establishes the **Uniform Penalty Administration Safe Harbor**: any tax penalty, civil regulatory fine, or administrative forfeiture assessed against an individual taxpayer or small business (under $25,000,000 gross receipts) is **automatically abated to $0.00 by operation of law** if the enforcing agency granted a waiver, non-prosecution agreement, or settlement reduction below 100 percent of statutory liability under the same provision to any top-1-percent taxpayer or $100M+ enterprise within the preceding 5 calendar years.

SEC. 302. CAPITAL MARKETS REVENUE MODERNIZATION: DOMESTIC REINVESTMENT INCENTIVE, EQUITY-COLLATERALIZED FACILITY EXCISE, AND FINANCIAL TRANSACTION EXCISE (26 U.S.C. §§ 59B, 4491, 4475, 280I).

(1) Domestic Wage & Factory Reinvestment Incentive Credit & Uninvested Windfall Surtax (26 U.S.C. § 59B): Grants corporations with over $100,000,000 in annual gross receipts a dollar-for-dollar tax reduction down to **$0.00** against a 50 percent excess-margin surtax for every dollar expended on non-executive domestic employee wage increases, registered apprenticeships, and domestic manufacturing or starter-housing construction.

(2) Large Equity-Collateralized Credit Facility Excise (26 U.S.C. § 4491): Imposes a 25 percent excise tax on loan proceeds exceeding $10,000,000 secured directly or indirectly by publicly traded equities, private-equity partnership interests, or foundation/trust endowments (100 percent exempting productive Main Street commercial, construction, and agricultural operating loans, and eligible for 100 percent tax deferral via Series U-MWIB bond subscription under § 1043A).

(3) Secondary Financial Transaction & Share Repurchase Excise (26 U.S.C. § 4475): Imposes a 0.5 percent excise on secondary stock, bond, derivative trades, and corporate share repurchases (**100 percent exempting** all 401(k), IRA, 403(b), 457, pension, and retail household accounts up to $250,000/year).

(4) Domestic Infrastructure Ownership Standard & 90-Day Repatriation Safe Harbor (26 U.S.C. § 280I): Grants a 90-day tax-free repatriation window for offshore intellectual property and capital, establishes a 75 percent U.S.-citizen ownership standard for covered social platforms (25,000,000+ monthly U.S. users) and defense/satellite contractors, and imposes a 40 percent cross-border asset transfer excise on $50,000,000+ expatriations outside the repatriation safe harbor.

SEC. 303. DOMESTIC COMPUTE INFRASTRUCTURE INVESTMENT CREDIT, 25% PUBLIC COMPUTE RESERVE, AND UTILITY RATEPAYER PROTECTION SCHEDULE (26 U.S.C. §§ 48F, 4494).

(a) 30% Domestic Compute Infrastructure Tax Credit, 100% NDAA Co-Funding & $0.00 Excise Safe Harbor (26 U.S.C. §§ 48F, 4494(b)).—Any terrestrial CONUS commercial compute facility or networked cluster (≥1 MW) qualifies for a **$0.00 federal grid, water, and compute excise rate**, a **30 percent refundable Domestic Infrastructure Investment Tax Credit (§ 48F)** on behind-the-meter clean energy and closed-loop cooling equipment, and **100 percent NDAA Title III defense reimbursement** for national-security reserve capacity when continuous, cryptographically signed **NIST smart-meter, USGS water-flow, and boundary acoustic telemetry** verifies that the facility: (1) utilizes 100 percent behind-the-meter clean power with zero residential ratepayer cost-shifting, (2) operates closed-loop zero-evaporative cooling, (3) maintains residential boundary sound levels at or below **45 dBA daytime / 40 dBA nighttime / 55 dBC low-frequency hum** (for nodes ≥250 kW), and (4) allocates **25 percent of total active compute capacity** to the public reserve: (A) **10 percent Citizen, Student & Small-Business Commons**, (B) **10 percent National Defense & Infrastructure Cybersecurity Reserve**, and (C) **5 percent GAO, Courts & Public Defender Reserve** (supporting § 7656(g) tax reconciliations, § 4949 foundation audits, uniform penalty reviews, and no-cost legal discovery software for Public Defenders).

> **(b) Standard Sliding-Scale Grid, Water & Cross-Border Equalization Schedule (26 U.S.C. § 4494(a), (e)–(f)).—**Facilities operating outside the subsection (a) behind-the-meter safe harbor are assessed on a progressive 3-tier schedule (Tier 1: 1–10 MW; Tier 2: 10–50 MW; Tier 3: 50 MW+, aggregated across controlled groups and virtual network fabrics) on public grid power draw ($25–$100/MWh), evaporative water consumption ($0.05–$0.25/gallon), residential boundary acoustic exceedances ($10,000/day per dB), and domestic workforce reductions (50 percent payroll-replacement surtax). Offshore AI compute imports into the U.S. market are subject to a 100 percent cross-border equalization tax; marine and cryospheric facilities are subject to a 200 percent environmental siting tax.

SEC. 304. CONSUMER DATA ROYALTY SAFE HARBOR AND COMMERCIAL DATA MONETIZATION EXCISE TAX (26 U.S.C. § 4495).

Commercial data brokers and AI training enterprises that maintain a revocable revenue-sharing agreement paying at least 50 percent of gross data monetization proceeds to the verified citizen data subject qualify for a **$0.00 excise rate**. Commercial sale, licensing, brokerage, or model training use of personal, biometric, or behavioral records outside the citizen royalty safe harbor is taxed on a **50 percent to 150 percent sliding-scale schedule** ($5 to $25 minimum per U.S. person record), and at a **200 percent rate ($50 per record)** for datasets lacking NIST-verified consent provenance.

SEC. 311. MINIMUM PAYOUT STANDARDS, ENDOWMENT PORTFOLIO ALIGNMENT, AND ADMINISTRATIVE EXPENSE RULES FOR TAX-EXEMPT FOUNDATIONS AND DONOR-ADVISED FUNDS (26 U.S.C. § 4949).

Subchapter A of chapter 42 of the Internal Revenue Code of 1986 is amended by adding at the end the following new section:

> **"SEC. 4949. MINIMUM PAYOUT STANDARDS, SERIES U-MWIB ENDOWMENT ALIGNMENT, AND QUALIFIED OPERATING CHARITY INCENTIVES.**

> **"(a) 120 Percent Enhanced Tax Deduction for Non-Executive Worker ESOPs and Verified Frontline Operating Charities.—**To encourage direct philanthropic delivery and employee ownership, any taxpayer who transfers cash or corporate equity irrevocably to (1) a non-executive **Employee Stock Ownership Plan (ESOP)** or worker cooperative, or (2) a **Verified Frontline Operating Charity** (an unaffiliated public charity with an annual budget under $10,000,000 dedicating at least 85 percent of expenditures directly to food, medical, shelter, educational, faith, environmental, or scientific delivery as certified by the local 12-Citizen Municipal Audit Panel) shall be allowed an enhanced **120 percent federal income and excise tax deduction** and a 100 percent capital-gains exclusion.

> **"(b) Safe-Harbor Payout and Series U-MWIB Endowment Portfolio Options for Foundations, DAFs, and Split-Interest Trusts.—**A Private Foundation (with net assets exceeding $10,000,000), Donor-Advised Fund account (exceeding $1,000,000), Charitable Lead or Remainder Trust, or Philanthropic LLC shall be **100 percent exempt** from the subsection (e) undistributed-endowment excise tax if it maintains compliance with either the Active Payout Option or the Wage-Indexed Endowment Option:

> "(1) *Option A (Active Frontline Payout Schedule).*—A Donor-Advised Fund disburses 100 percent of contributed funds within 36 months directly to unaffiliated frontline operating charities; and a Private Foundation or Charitable Trust disburses at least **10 percent of net assets annually** (15 percent for endowments exceeding $100,000,000) directly to unaffiliated frontline operating charities (or operates under an irrevocable 20-year complete spend-down charter); OR

> "(2) *Option B (Series U-MWIB Endowment Custody Safe Harbor).*—The Private Foundation, Donor-Advised Fund, or Trust holds **100 percent of its unspent non-operating investment corpus in Series U-MWIB Median-Wage Indexed Treasury Obligations** under 31 U.S.C. § 3102A(b)(3), thereby aligning the endowment's investment yield directly with United States median real wage growth and financing the Citizen Series M-MWIB retirement reserve.

> **"(c) Administrative Expense Standards and Proportionate Voting-Power Rules.—**

"(1) *Donor-Family Compensation Rules.*—To ensure tax-exempt charitable deductions subsidize public benefit rather than private family payroll, compensation, board fees, consulting retainers, or travel/aircraft expenses paid from a foundation, trust, or DAF to the donor, a substantial contributor (≥$1,000,000), or a relative within the fourth degree (as well as inter-conduit transfers from a Private Foundation to a DAF or 501(c)(4) entity) do not qualify as charitable distributions and are subject to a **100 percent Disqualified Expense Recapture Excise Tax**.

"(2) *Proportionate Voting-Share Adjustment on Dual-Class Stock Contributions.*—Whenever an officer, director, or 1-percent shareholder contributes non-voting or low-vote corporate shares to a foundation, DAF, or trust while retaining high-vote shares, an equal proportionate percentage of the donor's retained super-voting power is automatically voted in proportion to non-insider employee and public shareholders, and contributed insider shares are diversified over a 5-year transition schedule.

"(d) Multi-Year Blind Peer-Review Pool Safe Harbor for Academic and Research Grants (>$250,000).—To preserve academic independence, any charitable contribution or foundation grant exceeding $250,000 directed to a university, hospital laboratory, research institute, or scientific journal qualifies for tax-exempt deduction treatment when deposited into an **Irrevocable 5-Year Blind-Peer-Reviewed Departmental or National Research Pool** where the donor retains no annual renewal veto, personnel removal authority, or exclusive intellectual-property holdback (or places all resulting research data and patents in the public domain).

"(e) Standard Excise Schedule on Non-Qualifying Undistributed Reserves & Pledged Collateral.—Undistributed non-operating endowment assets of a covered foundation, DAF, or trust that does not elect Option A or Option B under subsection (b) are subject to a **50 percent annual undistributed-reserve excise tax**. Any credit facility backed directly or indirectly by foundation, DAF, or trust assets is aggregated with the contributor's balance sheet under section 4491, and donated tangible property failing to maintain continuous physical separation from the donor's premises is subject to a 100 percent deduction recapture excise."

TITLE IV—UNITED STATES MEDIAN-WAGE INDEXED TREASURY OBLIGATIONS (MWIBS) AND TAX-DEFERRED SUBSCRIPTION SAFE HARBOR

SEC. 401. THREE-SERIES MEDIAN-WAGE INDEXED TREASURY OBLIGATION ARCHITECTURE (31 U.S.C. § 3102A).

Chapter 31 of title 31, United States Code, is amended by inserting section 3102A, directing the Secretary of the Treasury (acting through the Bureau of the Fiscal Service within 30 days of enactment, and immediately authorized for administrative issuance under 31 U.S.C. § 3121 and 5 U.S.C. § 553(a)(2)) to publish the monthly **Real Net Median Wage Index (I_{MW})**—defined as BLS Non-Supervisory Production Worker Median Weekly Earnings (`CES0500000031`) divided by the weighted composite of the CPI Primary Shelter Index (`CUSR0000SAH1`, 65% weight) and CPI Household Energy & Water Utility Index (`CUSR0000SAH2`, 35% weight)—and to issue three series of United States Median-Wage Indexed Treasury Obligations:

Bond Series & Statutory Authority	Eligible Subscribers & Rollover Rules	Yield Formula & Principal Terms	Fiscal & Economic Function
1. Series M-MWIB (Citizen & Retirement Series) `31 U.S.C. § 3102A(b)(1)`	Natural-person U.S. citizens ($25 min on TreasuryDirect up to $250,000/yr new cash) + **100% UNCAPPED rollovers** for existing 401(k), IRA, 403(b), 457, and TSP retirement accounts.	Pays **2.00% fixed base interest + the GREATER of** CPI-U inflation OR annual growth of I_{MW}. 100% principal-protected at maturity; state/local tax-exempt.	Provides working families and retirees ($750k–$2M+) an inflation-protected, zero-downside retirement bond backed by the full faith and credit of the United States.
2. Series O-MWIB (Public Official Fiduciary Series) `31 U.S.C. § 3102A(b)(2)`	Zero-capital-gains divestment rollover bond (`26 U.S.C. § 1043(d)`) for Congress, White House, Cabinet, Federal Judges & Federal Reserve Officials (held during service + 5 yrs).	Pays strictly net real growth of I_{MW}. **Yields 0.00% interest** in any calendar quarter where CPI-U or shelter/utility inflation exceeds median hourly wage growth.	Aligns public-official investment returns directly with the real purchasing power of the median American paycheck.
3. Series U-MWIB (Tax-Deferral & Endowment Alignment Series) `31 U.S.C. § 3102A(b)(3)`	Elective 10-year tax-deferral safe-harbor bond for high-net-worth taxpayers, corporations, Private Foundations, DAFs & Trusts deferring `§ 4491`, `§ 280I`, `§ 59B`, or `§ 4949` excises.	Pays **0.00% base interest + 100% of net positive I_{MW} real wage growth**. In any quarter where I_{MW} declines, yields 0.00% and transfers 0.50% (2.0%/yr) of principal to the Series M-MWIB Reserve.	Finances the Citizen Series M-MWIB inflation floor using captive tax-deferred capital while giving large asset holders a direct financial incentive to raise median wages.

SEC. 402. ELECTIVE TAX-DEFERRAL SAFE HARBOR VIA SERIES U-MWIB SUBSCRIPTION AND REAL-WAGE GROWTH FORGIVENESS MILESTONE (26 U.S.C. § 1043A; 31 U.S.C. § 3102A(d)).

(a) 10-Year Tax-Deferral Election (26 U.S.C. § 1043A).—Any taxpayer, Private Foundation, Donor-Advised Fund, or Trust subject to an excise assessment under section 4491 (equity-collateralized loans), section 280I (cross-border asset transfers), section 59B (uninvested windfall surtax), or section 4949 (undistributed endowment reserves) may elect to defer up to **100 percent of such tax liability** for a 10-year term by subscribing an amount of **Series U-MWIB Treasury Obligations** equal to **200 percent of the deferred tax amount** (or 100 percent of a Private Foundation's unspent endowment reserve under § 4949(b)(2)).

(b) Self-Funding Reserve for Citizen Series M-MWIB Obligations (31 U.S.C. § 3102A(d)).—All principal subscribed into Series U-MWIB under subsection (a) is held in the **MWIB Sinking and Inflation-Protection Reserve** at the Bureau of the Fiscal Service. The 0.00 percent base coupon spread and any stagflation principal adjustments on Series U-MWIB holdings directly underwrite the CPI-U inflation floor on citizens' **Series M-MWIB** retirement accounts at zero net cost to the General Fund.

(c) 100 Percent Deferred-Tax Forgiveness Upon 25 Percent Real Median Wage Growth.—If, over the 10-year term of a Series U-MWIB subscription, the United States Real Net Median Wage Index (I_{MW}) achieves cumulative real growth of at least **25 percent above shelter and utility inflation** (or if the subscriber transfers at least 25 percent of the underlying principal to a non-executive Worker ESOP or Verified Frontline Operating Charity under § 4949(a)), **100 percent of the deferred excise tax liability is permanently extinguished** upon bond maturity.

TITLE V & TITLE VI—JUDICIAL REVIEW VENUE, SEVERABILITY, AND PUBLIC DEBT RETIREMENT

SEC. 501. APPLICATION OF INTERNAL REVENUE CODE ANTI-INJUNCTION PROVISIONS AND THREE-JUDGE VENUE (26 U.S.C. § 7421(c)).

All excises and credits enacted by Titles I, II, III, and IV are internal revenue taxes within the scope of 26 U.S.C. § 7421(a). Any civil action challenging the validity of any provision of this Act shall be heard by a three-judge district court of the United States District Court for the District of Columbia with direct expedited appeal to the Supreme Court. If any provision is held invalid, the permanent backup appropriation in 26 U.S.C. § 9512(g) automatically preserves 100 percent of household and municipal payments.

SEC. 601. $1.5 TRILLION INTRA-QUARTER CLEARING FACILITY AND AUTOMATIC QUARTERLY DEBT RETIREMENT (31 U.S.C. § 3101(c)).

Authorizes a $1,500,000,000,000 revolving intra-quarter Treasury cash-flow clearing margin to ensure seamless timing between quarterly GRS/paycheck credits and incoming excise collections. At the close of every calendar quarter, **100 percent of net excise surpluses** collected under Subchapter G and section 4949 (together with net Series U-MWIB reserve surpluses) shall be applied automatically by the Bureau of the Fiscal Service to **retire and cancel outstanding marketable public debt of the United States**, reducing the statutory debt limit dollar-for-dollar.