

## Internal Revenue Code Section 274(m)(3)

Disallowance of certain entertainment, etc., expenses

(m) Additional limitations on travel expenses.

(1) Luxury water transportation.

(A) In general. No deduction shall be allowed under this chapter for expenses incurred for transportation by water to the extent such expenses exceed twice the aggregate per diem amounts for days of such transportation. For purposes of the preceding sentence, the term "per diem amounts" means the highest amount generally allowable with respect to a day to employees of the executive branch of the Federal Government for per diem while away from home but serving in the United States.

(B) Exceptions. Subparagraph (A) shall not apply to—

- (i) any expense allocable to a convention, seminar, or other meeting which is held on any cruise ship, and
- (ii) any expense described in paragraph (2), (3), (4), (7), (8), or (9) of subsection (e).

(2) Travel as form of education. No deduction shall be allowed under this chapter for expenses for travel as a form of education.



(3) Travel expenses of spouse, dependent, or others. No deduction shall be allowed under this chapter (other than section 217) for travel expenses paid or incurred with respect to a spouse, dependent, or other individual accompanying the taxpayer (or an officer or employee of the taxpayer) on business travel, unless—

- (A) the spouse, dependent, or other individual is an employee of the taxpayer,
- (B) the travel of the spouse, dependent, or other individual is for a bona fide business purpose, and
- (C) such expenses would otherwise be deductible by the spouse, dependent, or other individual.