

Legalized Tax Fraud: How Top US Corporations Continue to Profit Through Offshore Tax Havens

February 18, 2015



A Report by Budget Committee Ranking Member Bernie Sanders

I. Introduction

The Business Roundtable (BRT), a coalition of CEOs from 201 of America's biggest companies, are supportive of raising the **retirement age for** Social Security and Medicare to 70, cutting Social Security benefits, lowering the corporate tax rate, and adopting a “territorial” tax system that exempts the offshore profits of American corporations from U.S. taxes.

In other words, these 201 CEOs **have callously** promoted the idea that benefits earned by Americans over the course of their working lives must be cut and taxes **for some of the most profitable corporations in this country** must be reduced to make America “competitive.” But information compiled by the Senate Budget Committee’s minority staff demonstrates that many of **these** companies have already found ways to avoid paying taxes to support their country.

At least 111 of the 201 companies represented by the BRT are using offshore tax havens and are saving an estimated \$280 billion by holding \$1 trillion in profits offshore, with much of that amount likely held in tax havens.

- 111 companies, over half the total, have disclosed that they own subsidiaries in countries previously identified by the Government Accountability Office as offshore tax havens. The actual number is certainly higher because many companies do not disclose all their offshore subsidiaries.
- These 111 companies collectively are officially holding more than \$1 trillion in profits offshore. This means that Business Roundtable member companies with tax haven subsidiaries account for half of the roughly \$2 trillion in profits that American corporations hold offshore where they are not subject to U.S. taxes.
- 21 of these companies disclose that if they officially brought their collective \$235 billion in offshore profits to the U.S., they would pay U.S. federal income taxes of \$65 billion, or 28 percent of the total. The rest of the companies do not disclose this information.
- Because American corporations are allowed to reduce their federal income tax bill on offshore profits by whatever income taxes they have already paid to foreign governments, this implies that these 21 companies paid income taxes at a rate of just 7 percent in the foreign countries where these profits are supposedly earned. This suggests widespread use of offshore tax havens by BRT member companies.
- If these 21 companies are representative off all the 111 BRT companies disclosing tax haven subsidiaries, this would mean that they would collectively owe 28 percent, \$280 billion, in federal income taxes if their \$1 trillion in offshore profits were officially brought to the U.S.

At least 81 of the companies represented by BRT are C corporations (companies that are supposed to pay the federal corporate income tax) that have been profitable for five years in a row and yet almost none are paying close to the official corporate income tax rate of 35 percent.

- From 2008 through 2012, these 81 corporations received a total of \$188 billion in corporate income tax breaks (calculated as the difference between 35 percent of their profits and what they actually paid during these years).
- Collectively, these 81 corporations paid federal income taxes of just 18.1 percent of their \$1.11 trillion in U.S. profits from 2008 through 2012. This means their *effective* federal income tax rate (18.1 percent) is just over half the *statutory* federal income tax rate (35 percent).
- Several have paid nothing at all but instead received refunds from the IRS during these years including American Electric Power, Boeing, Corning, Duke Energy, General Electric, the Interpublic Group, NextEra Energy, PG&E Corporation, Tenet Healthcare, and Verizon.

The first part of this report addresses the use of offshore tax havens by BRT members. It will focus on the 111 companies represented by the BRT that have disclosed ownership of subsidiaries in countries identified by the Government Accountability Office as offshore tax havens. Banks, tech and pharmaceutical companies are prominent among this group, but so are other companies (like Caterpillar, a manufacturer).

The second part of this report addresses the BRT member companies that are C corporations (which are supposed to pay the corporate income tax) and which have been profitable for several years in a row but still manage to avoid much of the federal corporate income tax. Manufacturers, energy companies and utilities are prominent among these this group, but so are other companies (like FedEx).

Tax Haven Abuse

To take just one example of the corporations examined in this report, Citigroup, officially holds \$43.8 billion in profits offshore and has disclosed that if it officially brought these profits to the U.S. it would pay federal income taxes equal to 27 percent of that amount. Since corporations are allowed to reduce their U.S. corporate income tax (which normally has a rate of 35 percent) by whatever they have paid to foreign governments, this implies Citibank has paid just 8 percent in income taxes in the foreign countries where these profits were supposedly earned. This suggests that much or most of these profits are officially held in countries where they are not taxed at all, offshore tax havens. The same is true for many of the other corporations represented by the Business Roundtable.

This report describes these profits as “officially” held offshore because much or most of these profits are actually earned in the U.S. or other countries where actual business is carried out and then manipulated through accounting gimmicks so that they appear to be earned in countries with no corporate income tax.

How do we know this? Because American corporations claim to generate more profits in tax havens, many of which are tiny countries with very small populations, than could possibly be earned there. The Congressional Research Service recently [found](#) that the profits American

corporations report to the IRS that they earn through their subsidiaries in Bermuda are equal to 16 times the entire gross domestic product (GDP) of Bermuda. The profits they report to earn through subsidiaries in the Cayman Islands equal 20 times the GDP of that tiny country.

A 2008 [report](#) from the Government Accountability Office uses several methods to create a list of well-known corporate tax havens. They include countries like Bermuda and the Cayman Islands, which have a corporate tax rate of zero percent, and countries like Ireland, the Netherlands and Luxembourg that provide loopholes and [special deals](#) so that profits can be moved through them and into the zero-tax countries like Bermuda and the Cayman Islands.

This report relies on [data](#) compiled by the U.S. Public Interest Research Group and Citizens for Tax Justice from corporations' public filings with the Securities and Exchange Commission, comparing offshore subsidiaries disclosed by each company with the list of tax havens used by the GAO in its 2008 report.

Many corporations likely have more tax haven subsidiaries than they disclose. They are required to disclose only "significant" subsidiaries and there is evidence that some companies have interpreted this in a way allowing them to stop revealing most of their subsidiaries. For example, a [study](#) by scholars from Baylor University and the University of Southern Maine concluded that Oracle simply stopped disclosing 99 percent of its subsidiaries between 2009 and 2010 rather than actually shutting down or divesting those subsidiaries.

Earning Consistent Profits But Paying Little or Nothing in Taxes

Of the 201 companies represented in the Business Roundtable, at least 81 have been profitable each year for five years in a row but almost all of these pay far less than the full 35 percent corporate tax rate.

Several have paid nothing at all but instead received refunds from the IRS during these years, including American Electric Power, Boeing, Corning, Duke Energy, General Electric, the Interpublic Group, NextEra Energy, PG&E Corporation, Tenet Healthcare, and Verizon. In theory, American corporations are allowed to receive income tax refunds for losses from previous years, but given that these corporations have all been profitable each year for five years straight (and longer in some cases) there is no public policy rationale for continuing to provide them with income tax refunds.

These 81 companies have received \$188 billion in income tax breaks over just five years. The total income tax break for each corporation is calculated as the amount it would have paid with no tax breaks (35 percent of its U.S. profits) minus what it actually paid. In some cases what a company actually paid is a negative number (because it received refunds from the IRS). In such cases, the total tax breaks for the corporation equal 35 percent of its profits plus what it received in refunds.

The figures for this part of the report are taken from [data](#) compiled by the Institute on Taxation and Economic Policy and Citizens for Tax Justice, which cover 2008 through 2012. In a few cases (Boeing, General Electric, and Verizon) available figures for 2008 through 2013 are used.

Despite claims by the Business Roundtable that lower taxes will provide investment and job growth, there is no evidence that corporations with lower tax bills actually create more jobs than those with higher tax bills. A December 2013 [report](#) from the Center for Effective Government (CEG) compared 30 of the highest taxed corporations to 30 of the lowest taxed corporations and found that the high-tax group created almost 200,000 jobs between 2008 and 2012, while the low-tax group collectively reduced employment by 51,000 jobs.

Updated figures in the nearby table from CEG for some of those low-tax companies represented by the Business Roundtable demonstrate that they are still not creating jobs.

Layoffs Despite Very Low Corporate Income Taxes

Corporation	Effective Income Tax Rate*	Job Losses Since 2008
Verizon	-2.0%	62,338
Honeywell	7.5%	5,861
Tenet Healthcare	-6.0%	3,264
American Electric Power	-5.8%	2,340
Duke Energy	-3.3%	852
Interpublic Group	-2.1%	600

*Effective rates based on data for 2008-2012 except for Verizon, for which available data covers 2008 through 2013.

Source: Center for Effective Government for jobs data, Institute on Taxation and Economic Policy and Citizens for Tax Justice for effective tax rate data.

II. Banks, Tech, Pharmaceuticals and Other Corporations Abusing Offshore Tax Havens

The following are examples of the companies represented by the Business Roundtable that are taking advantage of offshore tax havens.

CITIGROUP INC.

State where headquarters is located: New York.

Taxpayer bailout from the Federal Reserve and the Treasury Department: \$2.5 trillion.

Citigroup received a \$2.5 trillion bailout from the [Federal Reserve](#) and [U.S. Treasury](#) during the financial crisis.



Number of subsidiaries in offshore tax havens in early 2014: At least 427 according to a 2008 Government Accountability Office [report](#).

Profits officially held offshore in early 2014: \$43.8 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$11.7 billion.

In 2014, [Citigroup](#) reported that it held \$43.8 billion in profits offshore and that it would pay \$11.7 billion in U.S. income taxes, a rate of 27 percent, if it officially brought those profits to the

U.S. This implies that it has only paid income taxes at a rate of 8 percent in the foreign countries where these offshore profits are supposedly earned.

This is likely because much of these profits are held in tax havens. A 2008 report from the Government Accountability Office found that [Citigroup](#) had 427 subsidiaries incorporated in offshore tax havens including 90 subsidiaries *in the Cayman Islands alone*.

By 2013 Citigroup was disclosing only 21 subsidiaries in offshore tax havens. It is unlikely that Citigroup actually closed over 400 tax haven subsidiaries. There is strong [evidence](#) that many American corporations are simply choosing to not disclose as many of these subsidiaries as they had in the past.

GOLDMAN SACHS & CO.

State where headquarters is located: New York.

Taxpayer bailout from the Federal Reserve and the Treasury Department: \$824 billion.

During the financial crisis, Goldman Sachs received a total of \$814 billion in virtually zero interest loans from the Federal Reserve and a \$10 billion bailout from the Treasury Department.

Number of subsidiaries in offshore tax havens in early 2014: At least 29 according to a 2008 [report](#) from the Government Accountability Office.

A 2008 report from the Government Accountability Office found that Goldman Sachs had 29 subsidiaries incorporated in offshore tax havens including 15 subsidiaries *in the Cayman Islands alone*.



In 2014 Goldman Sachs disclosed only 15 subsidiaries total in the countries that the GAO identified as offshore tax havens, including Bermuda, the British Virgin Islands, Hong Kong, Mauritius and Singapore. It is unlikely that the company actually closed nearly half of its tax haven subsidiaries. There is strong [evidence](#) that many American corporations are simply choosing to not disclose as many of these subsidiaries as they had in the past.

Profits officially held offshore in early 2014: \$22.5 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$4.1 billion.

In 2014, Goldman Sachs reported that it officially held \$22.5 billion in profits offshore and that it would pay \$4.1 billion in U.S. income taxes, a rate of 18 percent, if it officially brought those profits to the U.S. This implies it has paid income taxes at a rate of just 17 percent in the foreign countries where those profits were supposedly earned suggesting that some of those profits are likely held in offshore tax havens.

BANK OF AMERICA

State where headquarters is located: North Carolina.

Taxpayer bailout from the Federal Reserve and the Treasury Department: \$1.3 trillion.

During the financial crisis, Bank of America received a total of more than \$1.3 trillion in virtually zero interest loans from the Federal Reserve and a \$45 billion bailout from the Treasury.

Number of subsidiaries in offshore tax havens in early 2014: At least 264.

In 2014 Bank of America disclosed that it had 264 subsidiaries in countries that the Government Accountability Office identified as tax havens, including 143 in the Cayman Islands alone.

Profits officially held offshore in early 2014: \$17 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$4.3 billion.

In 2014, Bank of America reported that it held \$17 billion in profits offshore and that it would pay \$4.3 billion in U.S. income taxes, a rate of 25 percent, if it officially brought those profits to the U.S. This implies it has only paid 10 percent in income taxes to the foreign countries where those profits are supposedly earned, suggesting that much of these profits are officially held in tax havens where they are not taxed at all.

Bank of America[®]



J.P. MORGAN CHASE & CO.

State where headquarters is located: New York.

Taxpayer bailout from the Federal Reserve and the Treasury Department: \$416 billion.

During the financial crisis, J.P. Morgan Chase received a total of more than \$391 billion in virtually zero interest loans from the Federal Reserve and a \$25 billion bailout from the Treasury Department, while the company's CEO Jamie Dimon served as a director of the New York Federal Reserve.

Number of subsidiaries in offshore tax havens in early 2014: At least 83.

In 2014 J.P. Morgan Chase disclosed that it owned at least 83 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 19 in the Cayman Islands and 16 in Mauritius, among others.

Profits officially held offshore in early 2014: \$28.5 billion

Federal income tax on offshore profits if they were brought to the U.S.: \$6.4 billion.

JPMorganChase

In 2014, J.P. Morgan reported that it officially held \$28.5 billion in profits offshore and that it would pay \$6.4 billion in U.S. income taxes, a rate of 22 percent, if it officially brought those profits to the U.S. This implies that it has only paid an income tax rate of 13 percent in the foreign countries where those profits were supposedly earned, suggesting that much of that amount is held by tax haven subsidiaries.

Effective federal income tax rate from 2008 through 2012: 25.1 percent.

Total federal income tax breaks from 2008 through 2012: \$5.9 billion.

If J.P. Morgan had paid the full 35 percent federal corporate income tax rate on its \$59.5 billion in profits from 2008 through 2012, it would have paid \$5.9 billion more in federal income taxes than it did.

AMERICAN EXPRESS COMPANY

State where headquarters is located: New York.



Number of subsidiaries in offshore tax havens in early 2014: At least 23.

American Express disclosed in 2013 that it had 23 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens.

Profits officially held offshore in early 2014: \$9.6 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$3,000.

In 2014, American Express reported that it held \$9.6 billion in profits offshore and that it would pay \$3 billion in U.S. income taxes, a rate of 31 percent, if it officially brought those profits to the U.S. This implies that American Express has only paid 4 percent in income taxes to the foreign countries where those profits are supposedly earned, suggesting that most of these profits are officially held in tax havens where they are not taxed at all.

Effective federal income tax rate 2008 through 2012: 17.5 percent.

Total federal income tax breaks 2008 through 2012: \$3.7 billion.

If American Express had paid the full 35 percent corporate income tax rate on its \$21.3 billion in profits from 2008 through 2012, it would have paid \$3.7 billion more in federal income taxes than it did.

IBM CORPORATION

State where headquarters is located: New York.

Number of subsidiaries in offshore tax havens in early 2014: At least 15.

In 2014 IBM disclosed that it owned subsidiaries in 15 countries identified by the Government Accountability Office as offshore tax havens.



Profits officially held offshore in early 2014: \$52.3 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

In 2014, IBM reported that it officially held \$52.3 billion in profits offshore but did not disclose how much it could pay in federal income taxes if it officially brought those profits to the U.S.

Effective federal income tax rate from 2008 through 2012: 5.8 percent.

Total federal income tax breaks from 2008 through 2012: \$13.2 billion.

If IBM had paid the full 35 percent corporate income tax rate on its \$45.3 billion in U.S. profits from 2008 through 2012, it would have paid \$13.2 more in federal income taxes than it did.



CISCO SYSTEMS, INC.

State where headquarters is located: California.

Number of subsidiaries in offshore tax havens in early 2014: At least 56.

In 2014 Cisco disclosed that it had 56 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens including Bahrain, Bermuda, the Cayman Islands, the Netherlands and several others.

Profits officially held offshore in early 2014: \$48 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

In 2014 Cisco reported that that it officially holds \$48 billion in profits offshore but has not disclosed what it would pay in U.S. taxes if those profits were officially brought to the U.S.

Other information to note:

Cisco's CEO John Chambers has [warned](#) that his company would move jobs offshore unless Congress enacts a repatriation holiday, which would call off most of the U.S. income tax on these profits. If most of Cisco's offshore profits were officially held in tax havens where they have not been taxed, that would explain why the company is particularly motivated to avoid paying the U.S. income tax that would apply if those profits are brought to the U.S. under the normal rules.

ORACLE



State where headquarters is located: California.

Number of subsidiaries in offshore tax havens in early 2014: At least 77 according to a 2008 [report](#) from the Government Accountability Office.

The GAO concluded in 2008 that Oracle had 77 subsidiaries in countries identified as offshore tax havens. In 2014 Oracle disclosed only 6 subsidiaries in these countries, but that is almost certainly because the company simply chose to stop disclosing most of these subsidiaries. A [study](#) by scholars from Baylor University and the University of Southern Maine concluded that Oracle simply stopped disclosing 99 percent of its subsidiaries between 2009 and 2010 rather than actually shutting down or divesting those subsidiaries.

Profits officially held offshore in early 2014: \$26.2 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$8 billion.

In 2014, Oracle reported that it officially held \$26.2 billion in profits offshore and that it would pay \$8 billion in U.S. taxes, a rate of 31 percent, if it officially brought those profits to the U.S. This implies that it has paid only 4 percent in the foreign countries where these profits are supposedly earned, suggesting that most of these profits are held in tax havens where they are not taxed.

QUALCOMM INCORPORATED

State where headquarters is located: California.

Number of subsidiaries in offshore tax havens in early 2014: At least 11.

In 2014 Qualcomm disclosed that it owned subsidiaries in at least 11 countries identified by the Government Accountability Office as offshore tax havens, including 3 in Bermuda and 2 in the British Virgin Islands, among others.

Profits officially held offshore in early 2014: \$21.6 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$7.6 billion.

In 2014, Qualcomm reported that it officially held \$21.6 billion in profits offshore and that it would pay \$7.6 billion in U.S. income taxes, a rate of 35 percent, if it officially brought those profits to the U.S. This implies that it has paid *no income tax* in the foreign countries where these profits are supposedly earned, which suggests they are held in tax havens where they are not taxed at all.

Effective federal income tax rate from 2008 through 2012: 13.7 percent.



Total federal income tax breaks from 2008 through 2012: \$2.3 billion.

If Qualcomm had paid the full 35 percent corporate income tax rate on its \$10.6 billion in U.S. profits from 2008 through 2012, it would have paid \$2.3 billion more in federal income taxes than it did.

XEROX CORPORATION

State where headquarters is located: Connecticut.

Number of subsidiaries in offshore tax havens in early 2014: At least 52.



In 2014 Xerox disclosed that it had at least 52 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 8 in Bermuda, 7 in Ireland and 15 in the Netherlands, among others.

Profits officially held offshore in early 2014: \$8 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

PFIZER

State where headquarters is located: New York.

Number of subsidiaries in offshore tax havens in early 2014: 128.

In 2014 Pfizer disclosed that it owned at least 128 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 28 in Ireland, 27 in Luxembourg and 37 in the Netherlands, among others.

Profits officially held offshore in early 2014: \$69 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.



In 2014, Pfizer reported that it officially held \$69 billion in profits offshore but did not disclose what it would pay in U.S. federal income taxes if it officially brought those profits to the U.S.

There is strong evidence that much of these offshore profits are actually U.S. profits that have been manipulated through accounting gimmicks to appear to be earned in tax havens. Pfizer had worldwide profits of \$43 billion from 2010 through 2012, but claimed to have losses in the U.S., despite the fact that 40 percent of its sales and 50 percent of its assets were in the U.S. Pfizer could easily have shifted profits earned in the U.S. to any of the 128 subsidiaries the company admits it has in offshore tax havens.

Other information to note:

Pfizer also received \$3.4 billion in federal contracts from 2010 through 2012.

AMGEN INC.

State where headquarters is located: California.

Number of subsidiaries in offshore tax havens in early 2014: At least 8.



In 2014 Amgen disclosed that it owned at least 8 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 3 in Bermuda alone.

Profits officially held offshore in early 2014: \$25.5 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$9.1 billion.

In 2014, Amgen reported that it officially held \$25.5 billion in profits offshore and that it would pay \$9.1 billion in U.S. income taxes, a rate of 35 percent, if it officially brought those profits to the U.S. This implies that it has paid zero percent in income taxes in the foreign countries where these profits were supposedly earned, suggesting they are held in tax havens where they are not taxed at all.

ABBOTT LABORATORIES

State where headquarters is located: Illinois.

Number of subsidiaries in offshore tax havens in early 2014: At least 79.

In 2014, Abbott disclosed that it owned at least 79 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 5 in Bermuda, 4 in the Cayman Islands and 22 in the Netherlands, among others.



Profits officially held offshore in early 2014: \$24 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

Other information to note:

A division of Abbott Laboratories' that produces generic drugs and is officially based in the Netherlands is being acquired by the Pennsylvania-based Mylan Laboratories to facilitate Mylan's corporate inversion.

ELI LILLY AND COMPANY

State where headquarters is located: Indiana.

Number of subsidiaries in offshore tax havens in early 2014:

At least 26.

In 2014 Eli Lily disclosed that it had at least 26 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including Bermuda, the British Virgin Islands, the Cayman Islands, the Netherlands, and several others.

Profits officially held offshore in early 2014: \$23.7 billion.



Federal income tax on offshore profits if they were brought to the U.S.: \$8.3 billion.

In 2014, Eli Lily reported that it held \$23.7 billion in profits offshore and that it would pay \$8.3 billion in U.S. taxes, a rate of 35 percent, if it officially brought those profits to the U.S. This implies it paid *no income taxes at all* in the foreign countries where those profits were supposedly earned, suggesting that they are held by tax haven subsidiaries.

Effective federal income tax rate from 2008 through 2012: 14.8 percent.

Total federal income tax breaks from 2008 through 2012: \$2 billion.

If Eli Lily had paid the full 35 percent federal corporate income tax rate on its \$10 billion in U.S. profits from 2008 through 2012, it would have paid \$2 billion more in federal income taxes than it did.

MEDTRONIC INC.

State where headquarters is located: Minneapolis.

Number of subsidiaries in offshore tax havens in early 2014: At least 37.

In 2014, Medtronic disclosed that it owned at least 37 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 5 in the Cayman Islands, 6 in Ireland, 5 in Luxembourg and 8 in the Netherlands, among others.

Profits officially held offshore in early 2014: \$20.5 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$3.5 billion to \$4.2 billion.



Medtronic

In 2014, Medtronic reported that it officially held \$20.5 billion in profits offshore but did not immediately disclose what it would pay in U.S. taxes if it officially brought those profits to the U.S. But Medtronic did disclose to the Minneapolis Star Tribune last summer that about \$14 billion of those offshore profits are cash (or cash equivalents) and that it would pay \$3.5 billion to \$4.2 billion, [25 to 30 percent](#), in U.S. federal income taxes on those profits if they were officially brought to the U.S. This implies that Medtronic has paid just 5 to 10 percent in income taxes to the foreign governments where these profits were supposedly earned, suggesting they are mostly held by tax haven subsidiaries.

Other information to note:

Medtronic has led the charge in Washington to repeal the medical device tax, one of the many revenue-raising provisions in the Affordable Care Act designed to require industries that will profit from the ACA to support expanding health coverage. In January Medtronic completed its \$50 billion [acquisition](#) of Covidien to facilitate a corporate inversion that will allow Medtronic to be a Irish company for tax purposes.

THE DOW CHEMICAL COMPANY

State where headquarters is located: Michigan.

Number of subsidiaries in offshore tax havens in early 2014: At least 93.



In 2014 the Dow Chemical Company disclosed that it owned at least 93 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 7 in Bermuda and 42 in the Netherlands, among others.

Profits officially held offshore in early 2014: \$16.1 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed

PROCTER & GAMBLE



State where headquarters is located: Ohio.

Number of subsidiaries in offshore tax havens in early 2014: At least 32.

In 2014 Procter & Gamble disclosed that it owned at least 32 subsidiaries countries identified by the Government Accountability Office as offshore tax havens, including 3 in Luxembourg and 14 in the Netherlands, among others.

Profits officially held offshore in early 2014: \$42 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

Effective federal income tax rate from 2008 through 2012: 22.9 percent.

Total federal income tax breaks from 2008 through 2012: \$5 billion.

If Procter & Gamble had paid the full 35 percent federal corporate income tax rate on its \$41 billion in U.S. profits from 2008 through 2012, it would have paid \$5 billion more in federal income taxes than it did.

CATERPILLAR INC.

State where headquarters is located: Illinois.

Number of subsidiaries in offshore tax havens in early 2014: At least 74.

In 2014 Caterpillar disclosed that it owned at least 74 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including Bermuda, the Cayman Islands, the Netherlands, Switzerland and several others.



Profits officially held offshore in early 2014: \$17 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

In 2014, Caterpillar reported that it officially held \$17 billion offshore but did not disclose what it would pay in federal income taxes if those profits were officially brought to the U.S.

In 2014 the Committee on Homeland Security and Governmental Affairs Permanent Subcommittee on Investigations held a [hearing](#) on Caterpillar and concluded that from 2000 through 2012 the company used a Swiss subsidiary to shift \$8 billion in profits to Switzerland. These profits were taxed at a rate of 4 to 6 percent under a special deal negotiated with that country's government, saving Caterpillar \$2.4 billion in U.S. federal income taxes.

THERMO FISHER SCIENTIFIC INC.

ThermoFisher
S C I E N T I F I C

State where headquarters is located: Massachusetts.

Number of subsidiaries in offshore tax havens in early 2014:
At least 144.

In 2014 Thermo Fisher Scientific disclosed that it owned 144 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 10 in the Cayman Islands, 19 in Luxembourg and 54 in the Netherlands, among others.

Profits officially held offshore in early 2014: \$6 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

STANLEY BLACK & DECKER, INC.

State where headquarters is located: Maryland.

Number of subsidiaries in offshore tax havens in early 2014: At least 98.

StanleyBlack&Decker

In 2014 Stanley Black & Decker disclosed that it owned at least 98 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 8 in the Cayman Islands, 12 in Luxembourg, and 20 in the Netherlands, among several others.

Profits officially held offshore in early 2014: \$4.4 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

BLACKROCK, INC.

State where headquarters is located: New York.

BLACKROCK

Number of subsidiaries in offshore tax havens in 2013: At least 40.

In 2014 BlackRock disclosed 40 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including the Cayman Islands, the Channel Islands, Luxembourg, and others.

Profits officially held in offshore tax havens in 2013: \$3 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

In 2014, BlackRock reported that it officially held \$3 billion in profits offshore but did not disclose what it would pay in U.S. taxes if those profits were officially brought to the U.S. Much, if not most, of those profits are likely held by its 40 tax haven subsidiaries.

WORLD FUEL SERVICES CORPORATION

State where headquarters is located: Florida.

Number of subsidiaries in offshore tax havens in early 2014: At least 32.

Profits officially held offshore in early 2014: \$1.1 billion.



Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

III. Manufactures, Energy Companies and Other Corporations Avoiding Federal Taxes

AMERICAN ELECTRIC POWER COMPANY, INC.



State where headquarters is located: Ohio.

Effective federal income tax rate 2008 through 2012:

Less than zero percent. Received refunds of \$577 million.

Total federal income tax breaks 2008 through 2012: \$4 billion.

If American Electric Power had paid the full 35 percent corporate income tax rate on its \$10 billion of profits from 2008 through 2012, it would have paid over \$4 billion more in federal income taxes than it did.

Other information to note:

As the table on page five illustrates, American Electric Power has eliminated over 2,300 jobs since 2008. This figure is adjusted so that it does not count divestments of parts of the company as job losses or acquisitions of companies as job increases.

AT&T

State where headquarters is located: Texas.

Effective federal income tax rate from 2008 through 2012:

6.5 percent.

From 2008 through 2012, AT&T paid \$4.4 billion in federal income taxes, which is just 6.5 percent of its \$67.3 billion in profits during those years.



Total federal income tax breaks from 2008 through 2012: \$19.2 billion.

If AT&T paid the full 35 percent federal corporate income tax rate on its \$67.3 billion in profits from 2008 through 2012, it would have paid \$19.2 billion more in federal income taxes than it did.

BOEING

State where headquarters is located: Illinois.

Effective federal income tax rate 2008

through 2013: Less than zero percent.

Received refunds of [\\$401 million](#).



Total federal income tax breaks 2008 through 2013: [\\$9.6 billion](#).

If Boeing had paid the full 35 percent corporate income tax rate on its \$26.4 billion in profits from 2008 through 2013, it would have paid \$9.6 billion more in taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least one.

In 2013 Boeing disclosed having a subsidiary in Bermuda.

Other information to note:

In February of 2012, President Obama [told](#) a crowd at a Boeing plant in Washington State that companies that use tax breaks to shift operations and profits offshore ought to pay more U.S. taxes and the revenue “should go towards lowering taxes for companies like Boeing that choose to stay and hire here in the United States of America.” In fact, Boeing has avoided paying almost any federal income taxes for [well over a decade](#).

COCA-COLA

State where headquarters is located: Georgia.

Effective federal income tax rate from 2008

through 2012: 12.8 percent.

From 2008 through 2012, Coca-Cola paid \$2.3 billion in federal income taxes, which is just 12.8 percent of its \$18.2 billion in U.S. profits during those years.



Total federal income tax breaks from 2008 through 2012: \$4 billion.

If Coca-Cola had paid the full 35 percent federal corporate income tax rate on its \$18.2 billion in U.S. profits from 2008 through 2012, it would have paid \$4 billion more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least 13.

In 2014 Coca-Cola disclosed that it owned at least 13 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 3 in the Cayman Islands.

Profits officially held offshore in early 2014: \$30.6 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

CORNING INCORPORATED

State where headquarters is located: New York.

Effective federal income tax rate from 2008 through 2012:

Less than zero percent. Received refunds of \$10 million.

Total federal income tax breaks from 2008 through 2012:

\$1.2 billion.

If Corning had paid the full 35 percent federal corporate income tax rate on its \$3.4 billion in profits from 2008 through 2012, it would have paid \$1.2 billion more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least 11.

In 2014 Corning disclosed that it has at least 11 subsidiaries in countries identified by the Government Accounting Office as offshore tax havens.

Profits officially held offshore in early 2014: \$12.4 billion.

In 2014 Corning reported that it officially held \$12.4 billion in profits offshore but did not disclose how much it would pay in U.S. taxes if those profits were officially brought to the U.S.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed,

Other information to note:

In July of 2012 Corning sent its vice president for tax to [testify](#) before the House Ways and Means Committee that the company's tax burden was too high.

DUKE ENERGY CORPORATION

State where headquarters is located: North Carolina.

Effective federal income tax rate from 2008 through 2012: Less than zero percent. Received refunds of \$299 million.

Total federal income tax breaks from 2008 through 2012: \$3.5 billion.



If Duke Energy had paid the full 35 percent federal corporate income tax rate on its \$9 billion in U.S. profits from 2008 through 2012, it would have paid \$3.5 billion more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least 26.



In 2014 Duke Energy disclosed that it had at least 26 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens including 15 in Bermuda, 5 in the Cayman Islands, and 6 in the Netherlands.

Profits officially held offshore in early 2014: \$1.7 billion.

Federal income tax on offshore profits if they were brought to the U.S.: \$288 million.

In 2014, Duke Energy reported that it held \$1.7 billion in profits offshore and that it would pay \$288 million in U.S. taxes, a rate of 17 percent, if it officially brought those profits to the U.S. That implies it has paid an income tax rate of 18 percent on these profits in the foreign countries where they were supposedly earned, suggesting that some of these profits are held in tax havens where they are not taxed.

Other information to note:

Duke Energy has publicly [promoted](#) a repatriation holiday, which would call off most of the U.S. taxes due on these offshore profits when they are brought to the U.S.

As the table on page five illustrates, Duke Energy has eliminated over 800 jobs since 2008. This figure is adjusted so that it does not count divestments of parts of the company as job losses or acquisitions of companies as job increases.

EXXON MOBIL

State where headquarters is located: Texas.

Effective federal income tax rate from 2008 through 2012: 14 percent.



From 2008 through 2012, Exxon Mobil paid \$5.8 billion in federal income taxes, which is 14 percent of its \$41.4 billion in U.S. profits during those years.

Total federal income tax breaks from 2008 through 2012: \$8.7 billion.

If Exxon Mobil had paid the full 35 percent federal corporate income tax rate on its \$41.4 billion in U.S. profits from 2008 through 2012, it would have paid \$8.7 billion more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least 38.

In 2014 Exxon Mobil disclosed that it owned at least 38 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including 19 in the Bahamas alone.

Profits officially held offshore in early 2014: \$47 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

FEDEX CORPORATION

State where headquarters is located: Tennessee.

Effective federal income tax rate 2008 through 2012: 4.2 percent.

From 2008 through 2012, FedEx paid just \$395 million in federal income taxes, which is just 4.2 percent of the \$9.4 billion in profits it made in the U.S. over that period.

Total federal income tax breaks from 2008 through 2012: \$2.9 billion.

If FedEx had paid the full 35 percent federal corporate income tax rate on its \$9.4 billion in U.S. profits from 2008 through 2012, it would have paid \$2.9 billion more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least 22.

Profits officially held offshore in early 2014: \$1.3 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

In 2014, FedEx reported that it officially held \$1.3 billion in profits offshore but did not disclose what it would pay if it officially brought those profits to the U.S. At least some of these profits are likely to be held by the 22 tax subsidiaries the company admits it owns in offshore tax havens.

Other information to note:

FedEx was one of the companies [revealed](#) last year to have special arrangement with the government of Luxembourg allowing profits shifted into the small European country to then be shifted to other tax havens, with only a small fee paid to Luxembourg in return.

GENERAL ELECTRIC



State where headquarters is located: Connecticut.

Effective federal income tax rate from 2008 through 2013: Less than zero percent. Received refunds of \$3 billion.

Total federal income tax breaks from 2008 through 2013: [\\$14.8 billion](#).

If General Electric had paid the full 35 percent federal income tax rate on its \$33.9 billion in profits from 2008 through 2013, it would have paid \$14.8 billion more in federal income taxes than it did.

Taxpayer bailout from the Federal Reserve: \$16 billion.



During the financial crisis, the Federal Reserve provided GE with [\\$16 billion](#) in financial assistance, at a time when its CEO Jeffrey Immelt was a director of the New York Federal Reserve.

Number of subsidiaries in offshore tax havens in early 2014: At least 18.

In 2014 GE disclosed that it had 18 subsidiaries in countries identified by the Government Accountability Office as offshore tax havens, including the Bahamas, Bermuda, Ireland, Luxembourg, the Netherlands and Singapore.

Profits officially held offshore in early 2014: \$110 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

In 2014, GE reported that it officially held \$110 billion in profits offshore but did not disclose what it would pay in federal income taxes if it officially brought those profits to the U.S. Much, if not most, of these profits are likely held by the 18 tax haven subsidiaries that GE has admitted it owns.

HONEYWELL INTERNATIONAL

State where headquarters is located: New Jersey.

Effective federal income tax rate from 2008 through 2012: 7.5 percent.

From 2008 through 2012, Honeywell paid just \$526 million in federal income taxes, which is just 7.5 percent of the \$7 billion in U.S. profits it had during those years.

Total federal income tax breaks from 2008 through 2012: \$1.9 billion.

If Honeywell had paid the full 35 percent federal corporate income tax rate on its \$7 billion in profits from 2008 through 2012, it would have paid \$1.9 billion more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least 5.

Profits officially held offshore in early 2014: \$13.5 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

Other information to note:

David Cote, the CEO of Honeywell, was a member of the Simpson-Bowles Commission and favored co-chairs' plan, which would have made significant spending cuts but would not have raised corporate tax revenue.

As the table on page five illustrates, Honeywell has eliminated over 5,800 jobs since 2008. This figure is adjusted so that it does not count divestments of parts of the company as job losses or acquisitions of companies as job increases.

INTERNATIONAL PAPER COMPANY

State where headquarters is located: Tennessee.

Effective federal income tax rate from 2008 through 2012: 2.6 percent.

From 2008 through 2012, International Paper paid \$74 million in federal income taxes, which is just 2.6 percent of its \$2.8 billion in profits during those years.

Total federal income tax breaks from 2008 through 2012: \$917 million.

If International Paper had paid the full 35 percent federal corporate income tax rate on its \$2.8 billion in profits from 2008 through 2012, it would have paid \$917 more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least 18.



Profits officially held offshore in early 2014: \$5.1 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

INTERPUBLIC GROUP

State where headquarters is located: New York.

Effective federal income tax rate from 2008 through 2012: Less than zero percent. Received refunds of 28 million.

Total federal income tax breaks from 2008 through 2012: \$484 million.

If the Interpublic Group had paid the full 35 percent corporate income tax rate on its \$1.3 billion in U.S. profits from 2008 through 2012, it would have paid \$484 million more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: At least one.



In 2014 the Interpublic Group disclosed that it had at least one subsidiary in a country identified by the Government Accountability Office as a tax haven (the Netherlands).

Profits officially held offshore in early 2014: \$2 billion.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

Other information to note:

As the table on page five illustrates, Interpublic Group has eliminated over 600 jobs since 2008. This figure is adjusted so that it does not count divestments of parts of the company as job losses or acquisitions of companies as job increases.

NEXTERA ENERGY, INC.

State where headquarters is located: Florida.

Effective federal income tax rate from 2008 through 2012: Less than zero. Received refunds of \$178 million.

Total federal income tax breaks from 2008 through 2012: \$4.2 billion.



If NextEra Energy had paid the full 35 percent federal corporate income tax rate on its \$11.4 billion in profits from 2008 through 2012, it would have paid \$4.2 billion more in federal income taxes than it did.

PEABODY ENERGY CORPORATION

State where headquarters is located: Missouri.

Effective federal income tax rate from 2008 through 2012: 5.9 percent.

Total federal income tax breaks from 2008 through 2012: \$827 million.

If Peabody Energy had paid the full 35 percent federal corporate income tax rate on its \$2.8 billion in U.S. profits from 2008 through 2012, it would have paid \$827 million more in federal income taxes than it did.



Number of subsidiaries in offshore tax havens in early 2014:
At least 17.

In 2014, Peabody Energy disclosed that it owned at least 17 subsidiaries in countries identified by the Government

Accountability Office as offshore tax havens, including 6 subsidiaries in Gibraltar (a Mediterranean nation with a population of less than 30,000) alone.

PG&E CORPORATION

State where headquarters is located: California.

Effective federal income tax rate from 2008 through 2012: Less than zero percent. Received refunds of \$1.2 billion.



Total federal income tax breaks from 2008 through 2012: \$3.6 billion.

If PG&E Corp. had paid the full 35 percent federal corporate income tax rate on its \$7 billion in U.S. profits from 2008 through 2012, it would have paid \$3.6 billion more in federal income taxes than it did.

PRINCIPAL FINANCIAL GROUP, INC.

State where headquarters is located: Iowa.

Effective federal income tax rate from 2008 through 2012: 7 percent.

Principal Financial Group paid \$269 million in federal income taxes from 2008 through 2012, which is just 7 percent of its \$3.8 billion in U.S. profits during those years.

Total federal income tax breaks from 2008 through 2012: \$1.1 billion.

If Principal had paid the full 35 percent federal corporate income tax rate on its \$3.8 billion in U.S. profits from 2008 through 2012, it would have paid \$1.1 billion more in federal income taxes than it did.



Number of subsidiaries in offshore tax havens in early 2014: At least 20.

In 2014, Principal Financial Group disclosed that it owned at least 20 subsidiaries in countries identified by the Government Accountability Office as offshore tax haven, including 3 in the Cayman Islands and 4 in Malta, among others.

Profits officially held offshore in early 2014: \$694 million.

Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

TENET HEALTHCARE CORPORATION

State where headquarters is located: Texas.

Effective federal income tax rate from 2008 through 2012: Less than zero percent. Received refunds of \$51 million.

Total federal income tax breaks from 2008 through 2012: \$350 million.

If Tenet Healthcare had paid the full 35 percent federal corporate income tax rate on its \$854 million in U.S.



profits from 2008 through 2012, it would have paid \$350 million more in federal income taxes than it did.

Other information to note:

As the table on page five illustrates, Tenet Healthcare has eliminated over 3,000 jobs since 2008. This figure is adjusted so that it does not count divestments of parts of the company as job losses or acquisitions of companies as job increases.

VERIZON

State where headquarters is located: New York.

Effective federal income tax rate from 2008 through 2013: Less than zero percent. Received refunds of \$732 million.

Total federal income tax breaks from 2008 through 2013: [\\$15.6 billion](#).

If Verizon had paid the full 35 percent federal corporate income tax rate on its \$42.5 billion in profits from 2008 through 2013, it would have paid \$15.6 billion more in federal income taxes than it did.

Number of subsidiaries in offshore tax havens in early 2014: None disclosed.

Profits officially held offshore in early 2014: \$2.1 billion.



Federal income tax on offshore profits if they were brought to the U.S.: Not disclosed.

Other information to note:

As the table on page five illustrates, Verizon has eliminated over 62,000 jobs since 2008. This figure is adjusted so that it does not count divestments of parts of the company as job losses or acquisitions of companies as job increases.

THE WILLIAMS COMPANIES, INC.



State where headquarters is located: Oklahoma.

Effective federal income tax rate from 2008 through 2012: 11.1 percent.

Total federal income tax breaks from 2008 through 2012: \$1.2 billion.

If Williams had paid the full 35 percent federal corporate income tax rate on its \$4.9 billion in U.S. profits from 2008 through 2012, it would have paid \$1.2 billion more in federal income taxes than it did.

APPENDIX

Business Roundtable Companies that Have Disclosed Subsidiaries in Offshore Tax Havens

Number of Tax Havens Subsidiaries, Amount Held Offshore, Taxes Avoided (dollar amounts in millions)

	State HQ	Tax Haven Subsidiaries	Amount Held Offshore	Federal Tax If Profits Repatriated	Tax Rate Paid to Foreign Countries
Totals for all 111 with tax haven subs		3,099	1,011,004	incomplete data	incomplete data
Totals for the 21 fully disclosing		610	235,161	65,225	28%
3M	Minnesota	12	9,700	not disclosed	not disclosed
Abbott	Illinois	79	24,000	not disclosed	not disclosed
The AES Corporation	Virginia	226	none reported	not disclosed	not disclosed
Aetna Inc.	Connecticut	10	none reported	not disclosed	not disclosed
AK Steel Corporation	Ohio	3	27	9	0%
Alcoa Inc.	New York	2	5,200	not disclosed	not disclosed
American Express Company	New York	23	9,600	3,000	4%
Ameriprise Financial	Ohio	2	none reported	not disclosed	not disclosed
Amgen Inc.	California	8	25,500	9,100	0%
Anadarko Petroleum Corporation	Texas	12	none reported	not disclosed	not disclosed
Assurant, Inc.	New York	12	144	6	31%
Avis Budget Group, Inc.	New Jersey	22	720	not disclosed	not disclosed
Ball Corporation	Colorado	31	none reported	not disclosed	not disclosed
Bank of America Corporation	North Carolina	264	17,000	4,300	10%
BlackRock, Inc.	New York	40	3,074	not disclosed	not disclosed
Boeing		1	none reported	not disclosed	not disclosed
BorgWarner Inc.	Michigan	2	2,300	not disclosed	not disclosed
Boston Consulting Group	Massachusetts	42	11,902	not disclosed	not disclosed
CA Technologies	New York	22	2,220	not disclosed	not disclosed
Caesars Entertainment Corporation	Nevada	18	110	13	23%
Campbell Soup Company	New Jersey	9	741	not disclosed	not disclosed
Cardinal Health, Inc.	Ohio	10	1,800	not disclosed	not disclosed
Caterpillar Inc.	Illinois	74	17,000	not disclosed	not disclosed
CF Industries	Illinois	5	1,000	not disclosed	not disclosed
CH2M HILL, Inc.	Colorado	2	266	19	28%
Chevron Corporation	California	13	31,300	not disclosed	not disclosed
Cigna	Pennsylvania	11	1,100	160	20%
Cisco Systems, Inc.	California	56	48,000	not disclosed	not disclosed
Citigroup Inc.	New York	21	43,800	11,700	8%
The Coca-Cola Company	Georgia	13	30,600	not disclosed	not disclosed
Coca-Cola Enterprises	Georgia	5	none reported	not disclosed	not disclosed
Cognizant Technology Solutions Corporation	New Jersey	19	4,828	not disclosed	not disclosed
Comcast Corporation	Pennsylvania	3	none reported	not disclosed	not disclosed
Computer Sciences Corporation	Virginia	26	2,977	not disclosed	not disclosed
ConocoPhillips	Texas	21	3,222	not disclosed	not disclosed
Corning Incorporated	New York	11	12,400	not disclosed	not disclosed
Cummins Inc.	Indiana	24	3,100	not disclosed	not disclosed
Danaher Corporation	District of Columbia	28	10,600	not disclosed	not disclosed
DaVita HealthCare Partners Inc.	Colorado	5	none reported	not disclosed	not disclosed
Deere & Company	Illinois	5	4,297	not disclosed	not disclosed
Dell Inc.	Texas	79	19,000	not disclosed	not disclosed
DIRECTV	California	14	14	not disclosed	not disclosed
The Dow Chemical Company	Michigan	93	16,139	not disclosed	not disclosed
Duke Energy Corporation	North Carolina	26	1,700	288	18%
DuPont	Delaware	21	15,978	not disclosed	not disclosed
Eastman Chemical Company	Tennessee	42	813	not disclosed	not disclosed
Eli Lilly and Company	Indiana	26	23,740	8,309	0%
EMC Corporation	Massachusetts	4	10,200	not disclosed	not disclosed
Exelis Inc.	Virginia	3	none reported	not disclosed	not disclosed
Express Scripts, Inc.	Missouri	5	82	30	0%
Exxon Mobil Corporation	Texas	38	47,000	not disclosed	not disclosed
FedEx Corporation	Tennessee	22	1,300	not disclosed	not disclosed
First Data Corporation	Georgia	34	none reported	not disclosed	not disclosed
Fluor Corporation	Texas	59	none reported	not disclosed	not disclosed

Business Roundtable Companies that Have Disclosed Subsidiaries in Offshore Tax Havens

Number of Tax Havens Subsidiaries, Amount Held Offshore, Taxes Avoided (dollar amounts in millions)

	State HQ	Tax Haven Subsidiaries	Amount Held Offshore	Federal Tax If Profits Repatriated	Tax Rate Paid to Foreign Countries
FMC Corporation	Texas	11	1,524	440	6%
Ford Motor Company	Michigan	4	7,500	1,000	22%
General Electric	Connecticut	18	110,000	not disclosed	not disclosed
General Mills, Inc.	Minnesota	55	2,700	not disclosed	not disclosed
General Motors Company	Michigan	21	6,700	not disclosed	not disclosed
Goldman Sachs & Co.	New York	15	22,540	4,060	17%
Harris Corporation	Florida	7	325	not disclosed	not disclosed
Hess Corporation	New York	7	7,500	not disclosed	not disclosed
Honeywell	New Jersey	5	13,500	not disclosed	not disclosed
Humana Inc.	Kentucky	1	none reported	not disclosed	not disclosed
IBM Corporation	New York	15	52,300	not disclosed	not disclosed
International Paper Company	Tennessee	18	5,100	not disclosed	not disclosed
The Interpublic Group of Companies, Inc.	New York	1	1,960	not disclosed	not disclosed
JPMorgan Chase & Co.	New York	83	28,500	6,400	13%
Kelly Services, Inc.	Michigan	11	77	not disclosed	not disclosed
Kindred Healthcare, Inc.	Kentucky	1	none reported	not disclosed	not disclosed
Macy's Inc.	Ohio	2	none reported	not disclosed	not disclosed
Marathon Oil Corporation	Texas	70	1,438	not disclosed	not disclosed
Marathon Petroleum Corporation	New York	2	none reported	not disclosed	not disclosed
MasterCard	New York	21	3,500	not disclosed	not disclosed
McGraw Hill Financial	New York	15	930	not disclosed	not disclosed
McKesson Corporation	California	1	4,200	not disclosed	not disclosed
Medtronic, Inc.	Minnesota	37	20,499	not disclosed	not disclosed
MetLife, Inc.	New York	29	3,300	not disclosed	not disclosed
Navistar International Corporation	Illinois	1	482	not disclosed	not disclosed
NextEra Energy, Inc.	Florida	1	none reported	not disclosed	not disclosed
Norfolk Southern Corporation	Virginia	1	none reported	not disclosed	not disclosed
Oracle	California	6	26,200	8,000	4%
Owens Corning	Ohio	17	1,270	264	14%
Peabody Energy Corporation	Missouri	17	none reported	not disclosed	not disclosed
PepsiCo, Inc.	New York	137	34,100	not disclosed	not disclosed
Pfizer Inc	New York	128	69,000	not disclosed	not disclosed
Phillips 66	Texas	17	1,700	not disclosed	not disclosed
Pitney Bowes Inc.	Connecticut	16	700	not disclosed	not disclosed
Principal Financial Group, Inc.	Iowa	20	694	not disclosed	not disclosed
The Procter & Gamble Company	Ohio	32	42,000	not disclosed	not disclosed
Prudential Financial, Inc.	New Jersey	31	1,973	not disclosed	not disclosed
Qualcomm Incorporated	California	11	21,600	7,600	0%
Rockwell Automation, Inc.	Wisconsin	5	2,427	not disclosed	not disclosed
RR Donnelley	Illinois	36	none reported	not disclosed	not disclosed
Stanley Black & Decker, Inc.	Maryland	98	4,439	not disclosed	not disclosed
Stryker Corporation	Michigan	38	7,023	not disclosed	not disclosed
Target Corporation	Minnesota	1	77	not disclosed	not disclosed
Tenneco	Illinois	7	858	159	16%
Texas Instruments Incorporated	Texas	17	6,870	not disclosed	not disclosed
Textron Inc.	Rhode Island	5	778	not disclosed	not disclosed
Thermo Fisher Scientific Inc.	Massachusetts	144	5,970	not disclosed	not disclosed
The Travelers Companies, Inc.	New York	2	714	not disclosed	not disclosed
UPS	Georgia	4	4,130	not disclosed	not disclosed
Viacom Inc.	New York	37	2,100	368	18%
Visa Inc.	California	1	3,800	not disclosed	not disclosed
W.W. Grainger, Inc.	Illinois	21	386	not disclosed	not disclosed
WESCO International, Inc.	Pennsylvania	11	526	not disclosed	not disclosed
Whirlpool Corporation	Michigan	33	3,500	not disclosed	not disclosed
The Williams Companies, Inc.	Oklahoma	12	none reported	not disclosed	not disclosed
World Fuel Services Corporation	Florida	32	1,100	not disclosed	not disclosed
Xerox Corporation	Connecticut	52	8,000	not disclosed	not disclosed

Source: U.S. Public Interest Research Group and Citizens for Tax Justice.

http://ctj.org/ctjreports/2014/06/offshore_shell_games_2014.php

**Consistently Profitable Fortune 500 Corporations Among the Business Roundtable:
U.S. Profits and Federal Income Taxes, 2008 through 2012 (dollar figures in millions)**

Company	State HQ	U.S. Profits	Federal Income Tax	Effective Tax Rate	Total Federal Inc. Tax Breaks
Totals		1,109,795	200,533	18.1%	187,895
3M	Minnesota	12,590	2,813	22.3%	1,593
AECOM Technology	California	646	34	5.2%	192
Aetna	Connecticut	12,109	3,506	29.0%	732
American Electric Power	Ohio	10,016	-577	-5.8%	4,083
American Express	New York	21,340	3,733	17.5%	3,736
American Financial Group	Ohio	2,833	921	32.5%	70
AT&T	Texas	67,293	4,352	6.5%	19,200
Ball	Colorado	1,403	273	19.4%	219
Boeing	Illinois	20,473	-202	-1.0%	7,368
CA	New York	3,686	1,167	31.7%	123
Campbell Soup	New Jersey	4,699	956	20.3%	688
Cardinal Health	Ohio	6,015	1,722	28.6%	383
CF Industries Holdings	Illinois	6,790	2,247	33.1%	129
Chevron	California	34,985	7,759	22.2%	4,486
Cigna	Pennsylvania	7,676	1,627	21.2%	1,059
Coca-Cola	Georgia	18,242	2,339	12.8%	4,046
Cognizant Technology Solutions	New Jersey	1,155	376	32.5%	29
Comcast	Pennsylvania	30,754	7,374	24.0%	3,390
ConocoPhillips	Texas	33,917	7,112	21.0%	4,759
Corning	New York	3,438	-10	-0.3%	1,213
CSX	Florida	12,171	1,528	12.6%	2,732
CVS Caremark	Rhode Island	27,319	9,250	33.9%	312
Danaher	District of Columbia	4,830	1,128	23.4%	563
Darden Restaurants	Florida	2,777	454	16.4%	518
DaVita	Colorado	3,528	860	24.4%	375
Deere	Illinois	10,582	3,158	29.8%	545
DirecTV	California	12,361	2,788	22.6%	1,539
Dominion Resources	Virginia	12,176	2,189	18.0%	2,073
Duke Energy	North Carolina	9,026	-299	-3.3%	3,458
DuPont	Delaware	3,631	446	12.3%	825
Eastman Chemical	Tennessee	2,510	429	17.1%	450
Eli Lilly	Indiana	10,037	1,483	14.8%	2,030
Express Scripts	Missouri	8,419	2,749	32.7%	198
Exxon Mobil	Texas	41,372	5,807	14.0%	8,673
FedEx	Tennessee	9,381	395	4.2%	2,888
Fluor	Texas	2,252	448	19.9%	340
FMC Technologies	Texas	453	87	19.2%	72
Frontier Communications	Connecticut	1,173	81	6.9%	329

**Consistently Profitable Fortune 500 Corporations Among the Business Roundtable:
U.S. Profits and Federal Income Taxes, 2008 through 2012 (dollar figures in millions)**

Company	State HQ	U.S. Profits	Federal Income Tax	Effective Tax Rate	Total Federal Inc. Tax Breaks
General Electric	Connecticut	27,518	-3,054	-11.1%	12,685
General Mills	Minnesota	9,508	1,943	20.4%	1,385
Goldman Sachs Group	New York	33,527	7,641	22.8%	4,094
Harris	Florida	3,628	1,157	31.9%	113
Honeywell International	New Jersey	6,976	526	7.5%	1,916
Humana	Kentucky	8,226	3,051	37.1%	-171
International Business Machines	New York	45,294	2,630	5.8%	13,223
International Paper	Tennessee	2,830	74	2.6%	917
Interpublic Group	New York	1,305	-28	-2.1%	484
J.P. Morgan Chase & Co.	New York	59,538	14,952	25.1%	5,886
Kindred Healthcare	Kentucky	428	94	21.9%	56
Lockheed Martin	Maryland	20,922	3,840	18.4%	3,483
Macy's	Ohio	6,209	1,437	23.1%	736
MasterCard	New York	7,098	1,610	22.7%	874
McGraw-Hill	New York	4,500	1,333	29.6%	242
McKesson	California	6,040	901	14.9%	1,213
NextEra Energy	Florida	11,433	-178	-1.6%	4,180
Norfolk Southern	Virginia	12,170	2,215	18.2%	2,045
Northrop Grumman	California	13,029	3,125	24.0%	1,435
Oracle	California	26,017	7,087	27.2%	2,019
Peabody Energy	Missouri	2,844	169	5.9%	827
PepsiCo	New York	18,221	4,135	22.7%	2,242
PG&E Corp.	California	7,035	-1,178	-16.7%	3,640
Pitney Bowes	Connecticut	2,281	531	23.3%	268
Principal Financial	Iowa	3,819	269	7.0%	1,068
Procter & Gamble	Ohio	41,046	9,380	22.9%	4,986
Qualcomm	California	10,606	1,454	13.7%	2,258
Rockwell Automation	Wisconsin	1,519	224	14.7%	308
Southern	Georgia	15,441	1,675	10.8%	3,729
Target	Minnesota	20,381	5,537	27.2%	1,596
Telephone & Data Systems	Illinois	1,542	478	31.0%	61
Tenet Healthcare	Texas	854	-51	-6.0%	350
Texas Instruments	Texas	8,978	2,885	32.1%	257
Thermo Fisher Scientific	Massachusetts	3,670	887	24.2%	398
Travelers Cos.	New York	16,405	2,590	15.8%	3,152
United Parcel Service	Georgia	22,754	6,258	27.5%	1,706
Verizon Communications	New York	30,203	-535	-1.8%	11,106
Viacom	New York	10,422	2,592	24.9%	1,056
Visa	California	14,384	5,067	35.2%	-33
W.W. Grainger	Illinois	3,929	1,195	30.4%	180
Wal-Mart Stores	Arkansas	87,187	25,376	29.1%	5,139
Wesco International	Pennsylvania	1,153	198	17.1%	206
Williams	Oklahoma	4,869	542	11.1%	1,162

For consistency figures in this table are for 2008 through 2012. In the text of the report figures through 2013 are used when available.

Source: Institute on Taxation and Economic Policy (ITEP) and Citizens for Tax Justice (CTJ)
<http://ctj.org/corporatetaxdodgers/>

