Corporate Income Tax as a Percent of Total Revenue

Year

Percent of Revenue

Source: White House Office of Management and Budget; www.whitehouse.gov/omb/budget/Materials, Table 2.2

Permanent Subcommittee on Investigations
EXHIBIT #1b
2011 Microsoft Intellectual Property Payments
(Puerto Rico)

Microsoft Intellectual Property Pool
(Over 85% Global R&D Done in U.S.)

$1.9 billion

Payment to U.S.
For Intellectual
Property

Revenues from
Sales in the U.S.
(Stays in Puerto
Rico and not Taxed
in U.S.)

Microsoft
Puerto Rico

$6.3 billion

Microsoft
Americas
Sales

Prepared by the U.S. Permanent Subcommittee on Investigations, September 2012
2011 Microsoft Intellectual Property Payments
(Two Examples)

Microsoft Intellectual Property Pool
(Over 85% Global R&D done in U.S.)

$1.2 billion
Microsoft Singapore (in Bermuda)

$3 billion
Microsoft Singapore Sales

$2.8 billion
Microsoft Ireland

$9 billion
Microsoft Ireland Sales

Payments to U.S. by Microsoft Offshore Entities

Offshore Royalties from Microsoft Subsidiaries

Prepared by the U.S. Permanent Subcommittee on Investigations, September 2012
Hewlett-Packard
Offshore Alternating Loan Program

CCHC
(HP Cayman Subsidiary)

Loan Dates
Loan 1: Jan 2 – Feb 17
Loan 2: Apr 2 – May 17
Loan 3: Jul 2 – Aug 17
Loan 4: Oct 2 – Nov 17

Hewlett-Packard
U.S.

BCC
(HP Belgian Subsidiary)

Loan Dates
Loan 1: Feb 17 – Apr 2
Loan 2: May 17 – Jul 2
Loan 3: Aug 17 – Oct 2
Loan 4: Nov 17 – Jan 2

Prepared by the U.S. Permanent Subcommittee on Investigations, September 2012