

Big Banks And The Executives Who Run Them Posted Huge Profits Even During The Pandemic-Influenced Economy of 2020, Will Washington Have The Guts To Make Them Pay Their Fair Share?

SUMMARY: President Biden's Infrastructure and American Families Plans would increase taxes on the wealthiest Americans and large mega-corporations in order to pay for crucial infrastructure and to help rebuild the American economy to succeed in the 21st Century. Together, the plans would nearly double the tax millionaires pay on stock profits while increasing the corporate tax rate to a proposed 28%, still well under the corporate tax rate prior to President Trump's 2017 Tax Bill.

The largest banks in the country are a case study into just how reasonable these plans are. These banks made tens of billions of dollars in profits during the pandemic-influenced year of 2020, and their CEOs made out handsomely as well:

- **JPMorgan Chase** reported [over \\$50 billion](#) in net income for 2020 and paid its CEO, Jamie Dimon, [\\$31,664,554](#) in total compensation.
- **Citigroup** reported [\\$11 billion](#) in net income for 2020 and paid its CEO, Michael Corbat, [\\$22,984,090](#) in total compensation.
- **Morgan Stanley** reported [nearly \\$11 billion](#) in net income for 2020 and paid its CEO, James Gorman, [\\$29,558,524](#) in total compensation.
- **Bank of America** reported [over \\$17 billion](#) in net income for 2020 and paid its CEO, Bryan Moynihan, [\\$25,940,571](#) in total compensation.
- **Wells Fargo** reported [over \\$3.3 billion](#) in net income for 2020 and paid its CEO, Charles Scharf, [\\$20,392,046](#) in total compensation.
- **Goldman Sachs** reported [over \\$9 billion](#) in net income for 2020 and paid its CEO, David Solomon, [\\$23,940,657](#) in total compensation.

This comes despite each company having a history of [incidents](#) involving [tax evasion](#), and likely billions of dollars sitting in [offshore tax havens](#).

Each of these companies can clearly afford to pay more in taxes to help fund crucial infrastructure projects and to build the economy of the 21st century. The only question is whether lawmakers in Washington have the stomach to pass a plan that properly funds the investment America needs.

President Biden's American Families Plan Would Nearly Double The Tax Millionaires Pay On Stock Profits.

President Biden's American Families Plan—The Companion To His Infrastructure-Focused American Jobs Plan—Would Close Tax Loopholes That “Reward Wealth Over Work,” Including Nearly Doubling Millionaires’ Long-Term Capital Gains Rate To 39.6%.

Biden's American Families Plan Would Eliminate Tax Loopholes That "Reward Wealth Over Work," Including Lower Rates On Capital Gains. "Today, President Biden announced the American Families Plan, an investment in our kids, our families, and our economic future. [...] The plan will also eliminate long-standing loopholes, including lower taxes on capital gains and dividends for the wealthy, that reward wealth over work." [The White House, [04/28/21](#)]

President Biden Has Proposed Increasing The Top Tax Rate On Long-Term Capital Gains To 39.6% From 20% For Households Making More Than \$1 Million. "President Joe Biden proposed raising the top rate on long-term capital gains to 39.6% from 20%. The tax hike would apply to households making more than \$1 million." [CNBC, [05/04/21](#)]

The Biden Administration Has Touted The American Families Plan As A Companion To The Infrastructure-Focused American Jobs Plan, Noting "Together, These Plans Reinvest In The Future Of The American Economy And American Workers." "The American Jobs Plan and the American Families Plan are once-in-a-generation investments in our nation's future. The American Jobs Plan will create millions of good jobs, rebuild our country's physical infrastructure and workforce, and spark innovation and manufacturing here at home. The American Families Plan is an investment in our children and our families—helping families cover the basic expenses that so many struggle with now, lowering health insurance premiums, and continuing the American Rescue Plan's historic reductions in child poverty. Together, these plans reinvest in the future of the American economy and American workers, and will help us out-compete China and other countries around the world." [The White House, [04/28/21](#)]

Biden's Proposed Capital Gains Tax Would Apply To Millionaires' Stock Holdings, When They Sell Them For A Profit.

Biden's Proposed Capital Gains Tax Increase Would Apply To Millionaires' Appreciated Stock Holdings. "The plan would raise the top tax rate to 39.6%. It would also roughly double the tax rate millionaires pay on appreciated stock and other assets — the so-called capital-gains tax." [CNBC, [05/19/21](#)]

Currently, Short-Term Capital Gains From Assets Held For One Year Or Less Are Taxed Like Regular Income. "Short-term capital gains result from selling capital assets owned for one year or less and are taxed as regular income." [Investopedia, accessed [05/19/21](#)]

Capital Gains Taxes Are Applied To The Profits From Selling An Asset. "Q. How are capital gains taxed? A. Capital gains are profits from the sale of a capital asset, such as shares of stock, a business, a parcel of land, or a work of art. Capital gains are generally included in taxable income, but in most cases, are taxed at a lower rate.." [Tax Policy Center, accessed [05/20/21](#)]

Biden's American Jobs Plan Would Raise Corporate Taxes From 21% To 28%—A Rate Still Lower Than The Corporate Tax Rate Before Trump's Tax Cuts.

Biden's Introduced His Infrastructure Proposal Known As The "American Jobs Plan" In March 2020.

March 2020: Biden's Unveiled His Infrastructure Package Known As "The American Jobs Plan." "President Biden on Wednesday will unveil a sprawling, ambitious infrastructure proposal that, if enacted, would overhaul how Americans get from Point A to Point B, how their electricity is generated, the speed of their Internet connections, the quality of their water and the physical makeup of their children's schools. The measure, called the American Jobs Plan, includes big infrastructure fixes that both major parties — as well as a majority of Americans — consistently say they want to see, including upgrades to bridges, broadband and buildings." [NPR, [3/31/21](#)]

The American Jobs Plan Would Be Funded Through Increasing Corporate Taxes From 21% To 28%—Before Trump’s Tax Cuts, The Corporate Tax Rate Was 35%.

Biden’s Plan Would Raise The Corporate Tax Rate From 21% To 28%, Still Seven Percentage Points Lower Than The Rate That Stood Before The Trump Tax Cuts. “The White House wants to raise corporate taxes to 28% — halfway between the current top corporate rate of 21% set by former President Donald Trump's 2017 tax law and the 35% rate before it was enacted. Biden's measure would also raise the global minimum tax for U.S. multinational corporations, attempting to stop the shifting of profits to tax havens.” [NPR, [3/31/21](#)]

JP Morgan Chase Had A Banner Year In 2020, Reporting Over \$50 Billion In Profit And Rewarding Its CEO With Over \$120 Million In Salary And Company Stock, In Addition To Cash Bonuses Over The Last Four Years – While The Company Has A History Of Stashing Billions In Offshore Accounts And Tax Havens, Avoiding Paying Millions In Corporate Taxes.

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Year ended December 31, (in millions, except ratios)	2020			2019			2018		
	Reported	Fully taxable- equivalent adjustments ⁽¹⁾	Managed basis	Reported	Fully taxable- equivalent adjustments ⁽¹⁾	Managed basis	Reported	Fully taxable- equivalent adjustments ⁽¹⁾	Managed basis
Other income	\$ 4,457	\$ 2,968	\$ 7,425	\$ 5,731	\$ 2,534	\$ 8,265	\$ 5,343	\$ 1,877	\$ 7,220
Total noninterest revenue ⁽²⁾	64,980	2,968	67,948	58,154	2,534	60,688	53,724	1,877	55,601
Net interest income	54,563	418	54,981	57,245	531	57,776	55,059	628	55,687
Total net revenue	119,543	3,386	122,929	115,399	3,065	118,464	108,783	2,505	111,288
Total noninterest expense ⁽³⁾	66,656	NA	66,656	65,269	NA	65,269	63,148	NA	63,148
Pre-provision profit	52,887	3,386	56,273	50,130	3,065	53,195	45,635	2,505	48,140

[JP Morgan Case 10-k Filing For Year 2020, [2/23/21](#)]

From 2016 To 2020, JPMorgan Chase CEO Jamie Dimon Made Only \$7.5 Million In Base Salary, But Earned More Than \$114 Million In Stock Awards

Jamie Dimon Is The CEO Of JPMorgan Chase. [Form 14A, Securities Exchange Commission, [04/07/21](#)]

From 2016 To 2021, Dimon Made \$7.5 Million In Base Salary While Earning About \$114,500,000 In Stock Awards:

Year	Base Salary	Stock Awards
2016	\$1,500,000	\$20,500,000
2017	\$1,500,000	\$21,500,000
2018	\$1,500,000	\$23,000,000
2019	\$1,500,000	\$24,500,000
2020	\$1,500,000	\$25,000,000
Total:	\$7,500,000	\$114,500,000
Percentage:	6.1%	93.8%

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An Oxfam Report Found That Home Depot Had Stashed Over \$31 Billion In Offshore Accounts Between 2008 And 2014 In Order To Evade Over \$11.8 Billion In US Taxes.

CORPORATION NAME	FEDERAL LOANS, BAILOUTS, LOAN GUARANTEES	PROFITS	FEDERAL INCOME TAX	TOTAL TAX	EFFECTIVE TAX RATE	TAX "BREAKS"	MONEY HELD OFFSHORE	SUBSIDIARIES IN TAX HAVENS	TOTAL LOBBYING
Ford Motor	\$27,578 M	\$22,951 M	-\$7,109 M	-\$7,952 M	-34.6%	\$15,985 M	\$4,300 M	4	\$44 M
General Electric	\$27,989 M	\$144,272 M	-\$5,183 M	\$9,718 M	6.7%	\$40,777 M	\$119,000 M	18	\$161 M
General Motors	\$50,347 M	\$70,945 M	-\$30,050 M ^(a)	-\$32,314 M	-45.5%	\$57,145 M	\$7,100 M	21 ^(b)	\$67 M
Goldman Sachs	\$910,115 M	\$76,527 M	\$13,382 M	\$24,032 M	31.4%	\$2,752 M	\$24,880 M	20	\$26 M
Hewlett-Packard	\$0	\$40,978 M	\$3,420 M	\$11,678 M	28.5%	\$2,664 M	\$42,900 M	25	\$41 M
Home Depot	\$0	\$44,577 M	\$13,156 M	\$16,159 M	36.2%		\$3,400 M	undisclosed	\$7 M
Honeywell International	\$50 M	\$24,885 M	\$3,342 M	\$6,510 M	26.2%	\$2,200 M	\$15,000 M	5	\$44 M
IBM	\$5 M	\$138,349 M	\$9,993 M	\$32,270 M	23.3%	\$16,152 M	\$61,400 M	15	\$39 M
Intel	\$142 M	\$90,501 M	\$19,792 M	\$24,105 M	26.6%	\$7,570 M	\$23,300 M	14	\$29 M
Johnson & Johnson	\$0	\$111,801 M	\$13,431 M	\$22,912 M	20.5%	\$16,218 M	\$53,400 M	58	\$43 M
JPMorgan Chase	\$1,298,182 M	\$155,072 M	\$24,862 M	\$42,405 M	27.3%	\$11,870 M	\$31,100 M	4	\$47 M

[Oxfam, "Broken At The Top," [4/12/16](#)]

A 2016 Oxfam Report Found That Nearly 97% Of JP Morgan's Subsidiaries Were Located In Tax Havens While The Company Only Disclosed 0.9% Of Said Subsidiaries On Their 10-K Filings.

A 2016 Oxfam Report Found That Nearly 97% Of JP Morgan's Subsidiaries Were Located In Tax Havens As Of 2014.

	All Foreign Subsidiaries	In Tax Havens ²	Percent in Tax Havens
Bank of America Corporation	308	260	84.4%
Citigroup	890	583	65.5%
JP Morgan Chase & Co.	2673	2588	96.8%
Wells Fargo & Co.	136	135	99.3%
TOTAL	4007	3566	89.0%

[Oxfam, [1/11/16](#)]

The Same Study Also Found That JP Morgan Only Reported 0.9% Of These Subsidiaries On Their 2014 10-K SEC Report.

	Federal Reserve	2014 10K	Percent disclosed on 10K
Bank of America Corporation	1518	103	6.8%
Citigroup	1620	279	17.2%
JP Morgan Chase & Co.	5516	49	0.9%
Wells Fargo & Co.	2034	1427	70.2%
TOTAL	10688	1858	17.4%

[Oxfam, [1/11/16](#)]

A 2013 Citizens For Tax Justice Report Found That JP Morgan Held \$25.1 Billion In Unrepatriated Income In Offshore Tax Havens With An Implied Tax Rate Of Just 23%, Far Less Than The Corporate Tax Rate At The Time.

A 2013 Citizens For Tax Justice Report Found That JP Morgan Held \$25.1 Billion In Unrepatriated Income In Offshore Tax Havens.

Company Name	Unrepatriated Income (\$Millions)	Estimated Tax Bill (\$Millions)	Implied Tax Rate
Shaw Group	\$ 288	\$ 111	39%
Express Scripts	66	24	37%
Amgen	22,200	7,900	36%
Advanced Micro Devices	386	137	35%
Qualcomm	16,400	5,800	35%
Gilead Sciences	7,250	2,540	35%
Wynn Resorts	334	117	35%
Eli Lilly	20,980	7,343	35%
AK Steel Holding	24	8	35%
Western Digital	6,300	2,100	33%
Tenneco	728	239	33%
Nike	5,500	1,800	33%
Dell	19,000	6,200	33%
Baxter International	10,600	3,400	32%
Microsoft	60,800	19,400	32%
Apple	82,600	26,071	32%
American Express	8,500	2,600	31%
Oracle	20,900	6,300	30%
Symantec	2,800	830	30%
United States Steel	2,700	800	30%
Jacobs Engineering Group	26	8	29%
Wells Fargo	1,300	367	28%
Citigroup	42,600	11,500	27%
Walt Disney	566	150	27%
MDU Resources	8	2	26%
CH2M Hill	161	42	26%
Biogen Idec	3,300	850	26%
Air Products & Chemicals	5,278	1,333	25%
Bank of America Corp.	17,200	4,300	25%
FMC Technologies	1,279	317	25%
Clorox	146	36	25%
Peabody Energy	500	120	24%
Assurant	137	32	23%
Washington Post	64	15	23%
J.P. Morgan Chase & Co.	25,100	5,700	23%
Northern Trust	815	180	22%

[Citizens For Tax Justice, "Apple Is Not Alone, [6/03/13](#)]

The Corporate Income Tax In 2013 For Income Above \$18.33 Million Was 35%

Corporate Income Tax		
15%	>	\$0
25%	>	\$50,000
34%	>	\$75,000
39%	>	\$100,000
34%	>	\$335,000
35%	>	\$10,000,000
38%	>	\$15,000,000
35%	>	\$18,333,333

[Tax Foundation, [3/14/13](#)]

In 2012 JP Morgan Was Forced To Settle With The UK Government For Over \$855 Million In 2020 Value For Using An Offshore Trust To Avoid Paying Taxes On Staff Compensation, Including Bonuses.

In 2012 JP Morgan Was Forced To Settle With The UK Government For £500m For Using An Offshore Trust To Avoid Paying Taxes On Staff Compensation, Including Bonuses. “The extent of corporate tax avoidance, and the anger it provokes, widened considerably yesterday with revelations that a leading investment bank has been using a trust based in the Channel Islands to avoid company and staff taxes on payments, including bonuses. The bank, JP Morgan, is expected to reach a £500m settlement with the Government over a Jersey-based trust, to which more than 2,000 current and former staff will contribute, according to a report in the Financial Times.” [The Independent, [12/09/12](#)]

£500m In 2012 Money Is Worth Over \$855 Million In 2020 Value. [Bank Of England Inflation Calculator, [Accessed 5/18/21](#)] [Currency Rate Today, [Accessed 5/18/21](#)]

French Authorities Filed Criminal Charges Against JP Morgan’s Main US Banking Unit For Funding Transactions That Allowed Executives Of French Firm Wendel To Pocket \$363 Million In Stock And Avoid Paying Taxes On Those Transactions.

French Authorities Filed Criminal Charges Against JP Morgan’s Main US Banking Unit For Funding Transactions That Allowed Executives Of French Firm Wendel To Pocket \$363 Million In Stock And Avoid Paying Taxes On Those Transactions. “French prosecutors have filed preliminary criminal charges against a unit of J.P. Morgan Chase JPM -0.31% & Co. for its alleged complicity in tax fraud, according to court documents reviewed by The Wall Street Journal. Prosecutors are investigating the role of J.P. Morgan’s main U.S. banking unit in a series of transactions entered into by 14 senior executives of French investment firm Wendel Investissement in 2007, according to the court documents. Prosecutors believe J.P. Morgan Chase Bank National Association funded transactions that enabled the Wendel executives to pocket shares worth about 320 million euros (\$363 million) and to defer tax payments on those shares, the documents say.” [Wall Street Journal, [5/06/15](#)]

- **The Case Was Thrown Out For “Clerical Errors,” But Judicial Sources Claimed It Did Not Exonerate JP Morgan.** “A French appeals court on Monday dropped a case against JPMorgan Chase for allegedly aiding tax fraud at the Wendel investment group, citing clerical errors, sources at the prosecutors office said. [...] This does not, however, necessarily mean the end of the case for JP Morgan, a judicial source said.” [France 24., [1/22/18](#)]

JP Morgan Established Secret Tax Agreements With The Government Of Infamous Tax Haven Luxembourg, Whose Regulatory Practices Are The Subject Of EU Probes And Legal Actions, To Evade Global Taxes—American Companies In Similar Secret Agreements In The Nation Paid Less Than 1% In Taxes.

JP Morgan Established Secret Tax Agreements With The Government Of Infamous Tax Haven Luxembourg According To Leaked Documents. “Pepsi, IKEA, FedEx and 340 other international companies have secured secret deals from Luxembourg, allowing many of them to slash their global tax bills while maintaining little presence in the tiny European duchy, leaked documents show. [...] Other companies seeking tax deals from Luxembourg come from private equity, real estate, banking, manufacturing, pharmaceuticals and other industries, the leaked files show. They include Accenture, Abbott Laboratories, American International Group (AIG), Amazon, Blackstone, Deutsche Bank, the Coach handbag empire, H.J. Heinz, JP Morgan Chase, Burberry, Procter & Gamble, the Carlyle Group and the Abu Dhabi Investment Authority.” [ICIJ, [11/05/14](#)]

For Example, FedEx Established Two Luxembourg Affiliates Via Similar Secret Agreements To Move Money Across International Borders While Paying Only 0.25% Of Non-Dividend Income Flow.

“The records show, for example, that Memphis-based FedEx Corp. set up two Luxembourg affiliates to shuffle earnings from its Mexican, French and Brazilian operations to FedEx affiliates in Hong Kong. Profits moved from Mexico to Luxembourg largely as tax-free dividends. Luxembourg agreed to tax only one quarter of 1 percent of FedEx’s non-dividend income flowing through this arrangement – leaving the remaining 99.75 percent tax-free.” [ICIJ, [11/05/14](#)]

Members Of The European Union’s Parliament Went On A Mission To Investigate To Luxembourg The Scale Of Luxembourg’s Private Tax Code After The Leak Of Secret Tax Agreements, Including Those= Made With JP Morgan.

“A two-day mission by a group of MEPs to Luxembourg looking into the country’s practices of tax evasion and money laundering – including breaches of EU law – has yielded more questions than answers. A delegation from the European Parliament’s Committee of Inquiry into Money Laundering, Tax Avoidance and Tax Evasion (PANA) held discussions with the Duchy’s Finance Minister, along with members of the Luxembourgian parliament’s Finance Committee, the Justice Minister and the Director of the Direct Contributions Administration. [...] ‘But according to data released by the International Consortium of Investigative Journalists, during Juncker’s 18 years as Prime Minister, 548 Luxembourg tax agreements were created to provide favourable tax cuts to a range of multinationals that included Pepsi, IKEA, AIG, Coach, Apple, Deutsche Bank, Amazon, Fiat, Burberry, Heinz and JP Morgan,’ Urbán said.” [GUENGL Party Press Release, [3/03/17](#)]

In 2020 The European Union Launched Legal Actions Against Luxembourg For Refusing To Clamp Down On Tax Avoidance.

“The European Commission has launched legal actions against Luxembourg over laws to prevent money laundering and tax avoidance, it said in a statement. New European Union rules to step up scrutiny of financial assets controlled by politicians and companies’ owners were approved in May 2018 to clamp down on money laundering, but Luxembourg is among the EU states that are not yet fully applying them, the Commission said on Thursday.” [Al Jazeera, [5/14/20](#)]

JP Morgan Was Involved In What Was Called “The Biggest Tax Theft In The History Of Europe,” Which Resulted In Multiple Countries Losing \$60 Billion In Via Evaded Taxes.

JP Morgan Was Involved In A Scheme Running From 2006 To 2011 That Used A Monetary Maneuver To Produce Two Refunds For A Dividend Tax Paid On One Basket Of Stocks. “The scheme was built around ‘cum-ex trading’ (from the Latin for ‘with-without’): a monetary maneuver to avoid double taxation of investment profits that plays out like high finance’s answer to a David Copperfield stage illusion. Through careful timing, and the coordination of a dozen different transactions, cum-ex trades produced two refunds for dividend tax paid on one basket of stocks. [...]. Outrage in these countries has focused on the City of London, Britain’s answer to Wall Street. Less scrutinized has been the role played by Americans, both individual investors and branches of U.S. investment banks in London, including Morgan Stanley, JPMorgan Chase and Bank of America Merrill Lynch.” [The Chicago Tribune, [2/01/20](#)]

The Scheme Resulted In European Countries Losing \$60 Billion In Tax Revenue In What has Been Called “The Biggest Tax Theft In The History Of Europe,” Which Resulted In Multiple Countries Losing \$60 Billion In Via Evaded Taxes.

“Today, the men stand accused of participating in what Le Monde has called ‘the robbery of the century,’ and what one academic declared ‘the biggest tax theft in the history of Europe.’ From 2006 to 2011, these two and hundreds of bankers, lawyers and investors made off with a staggering \$60 billion, all of it siphoned from the state coffers of European countries.” [The Chicago Tribune, [2/01/20](#)]

Citigroup Reported Over \$11 Billion In Net Income And Rewarded Its CEO With Over \$70 Million In Salary And Company Stock In Addition To Cash Bonuses Over The Last Four Years – While The Company Has A History Of Stashing Billions Of Dollars In Offshore Accounts And Tax Havens, Avoiding Corporate Taxes And Facing Fines From Financial Regulatory Agencies For Tax Avoidance.

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<i>In millions of dollars, except per share amounts</i>		2020
Net interest revenue	\$	43,548 \$
Non-interest revenue		30,750
Revenues, net of interest expense	\$	74,298 \$
Operating expenses		43,171
Provisions for credit losses and for benefits and claims		17,495
Income from continuing operations before income taxes	\$	13,632 \$
Income taxes ⁽¹⁾		2,525
Income (loss) from continuing operations	\$	11,107 \$
Income (loss) from discontinued operations, net of taxes		(20)
Net income (loss) before attribution of noncontrolling interests	\$	11,087 \$
Net income attributable to noncontrolling interests		40
Citigroup's net income (loss)⁽¹⁾	\$	11,047 \$

[Citigroup 10-K Filing For Year 2020, [2/26/21](#)]

From 2016 To 2020, Citigroup CEO Michael Corbat Made \$7.5 Million In Base Salary, But Earned Over \$66 Million In Stock Awards

Michael Corbat Is The CEO Of Citigroup. [Form 14A, Securities Exchange Commission, [3/17/21](#)]

From 2016 To 2020, Corbat Earned Just \$7.5 Million But Made \$66,829,465 In Company Stock:

Year	Base Salary	Stock Awards
2016	\$1,500,000	\$7,645,356
2017	\$1,500,000	\$9,831,752
2018	\$1,500,000	\$15,912,666
2019	\$1,500,000	\$17,237,115
2020	\$1,500,000	\$16,202,576
Total:	\$7,500,000	\$66,829,465

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An Oxfam Report Found That Citigroup Had Stashed Over \$43.8 Billion In Offshore Accounts Between 2008 And 2014 And Evaded Over \$11.8 Billion In US Taxes In The Same Period.

CORPORATION NAME	FEDERAL LOANS, BAILOUTS, LOAN GUARANTEES	PROFITS	FEDERAL INCOME TAX	TOTAL TAX	EFFECTIVE TAX RATE	TAX "BREAKS"	MONEY HELD OFFSHORE	SUBSIDIARIES IN TAX HAVENS	TOTAL LOBBYING
Alphabet (Google)	\$0	\$84,902 M	\$12,783 M	\$17,167 M	20.2%	\$12,549 M	\$47,400 M	2	\$73 M
American Express	\$8,986 M	\$42,672 M	\$9,423 M	\$12,982 M	30.4%	\$1,953 M	\$9,700 M	23	\$19 M
American International Group (AIG)	\$232,566 M	-\$77,705 M	-\$28,199 M	-\$20,870 M	26.9%		undisclosed	17	\$31 M
Amgen	\$0	\$35,545 M	\$2,633 M	\$3,994 M	11.2%	\$8,447 M	\$29,300 M	8	\$70 M
Apple	\$0	\$231,107 M	\$50,771 M	\$59,823 M	25.9%	\$21,064 M	\$181,100 M	3	\$17 M
AT&T	\$0	\$87,076 M	\$18,671 M	\$20,817 M	23.9%	\$9,660 M	undisclosed	undisclosed	\$113 M
Bank of America	\$3,495,477 M	\$33,361 M	-\$7,050 M	\$3,346 M	10.0%	\$8,330 M	\$17,200 M	22	\$24 M
Berkshire Hathaway	\$11 M	\$132,628 M	\$32,065 M	\$39,501 M	29.8%	\$6,919 M	\$10,000 M	9	\$53 M
Boeing	\$59,916 M	\$34,905 M	\$8,572 M	\$9,659 M	27.7% ^[1]	\$2,558 M	\$800 M	1	\$117 M
Capital One Financial	\$3,355 M	\$29,166 M	\$8,014 M	\$9,321 M	25.0%	\$2,903 M	\$1,400 M	undisclosed	\$12 M
Caterpillar	\$5,532 M	\$3,702 M	-\$71 M	\$837 M	22.6%	\$459 M	\$2,000 M	72	\$26 M
Chevron	\$1,250 M	\$254,713 M	\$13,164 M	\$106,732 M	41.9%		\$35,700 M	12	\$85 M
Cisco Systems	\$5 M	\$67,235 M	\$8,232 M	\$11,986 M	17.8%	\$11,546 M	\$52,700 M	59	\$15 M
Citigroup	\$2,589,079 M	\$9,340 M	-\$32,246 M	-\$8,567 M	-91.7%	\$11,836 M	\$43,800 M	41	\$40 M

[Oxfam, "Broken At The Top," [4/12/16](#)]

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55 Companies That Disclose Likely Tax Payments from Repatriation

Company Name	Unrepatriated Income (\$Millions)	Estimated Tax Bill (\$Millions)	Implied Tax Rate
Shaw Group	\$ 288	\$ 111	39%
Express Scripts	66	24	37%
Amgen	22,200	7,900	36%
Advanced Micro Devices	386	137	35%
Qualcomm	16,400	5,800	35%
Gilead Sciences	7,250	2,540	35%
Wynn Resorts	334	117	35%
Eli Lilly	20,980	7,343	35%
AK Steel Holding	24	8	35%
Western Digital	6,300	2,100	33%
Tenneco	728	239	33%
Nike	5,500	1,800	33%
Dell	19,000	6,200	33%
Baxter International	10,600	3,400	32%
Microsoft	60,800	19,400	32%
Apple	82,600	26,071	32%
American Express	8,500	2,600	31%
Oracle	20,900	6,300	30%
Symantec	2,800	830	30%
United States Steel	2,700	800	30%
Jacobs Engineering Group	26	8	29%
Wells Fargo	1,300	367	28%
Citigroup	42,600	11,500	27%

[Citizens For Tax Justice, "Apple Is Not Alone, [6/03/13](#)]

The Corporate Income Tax In 2013 For Income Above \$18.33 Million Was 35%.

Corporate Income Tax		
15%	>	\$0
25%	>	\$50,000
34%	>	\$75,000
39%	>	\$100,000
34%	>	\$335,000
35%	>	\$10,000,000
38%	>	\$15,000,000
35%	>	\$18,333,333

[Tax Foundation, [3/14/13](#)]

Citigroup Was Fine \$600,000 In 2009 By The Financial Industry Regulatory Authority For Helping Foreign Clients Evade Dividend Taxes.

Citigroup Was Fine \$600,000 In 2009 By The Financial Industry Regulatory Authority For Helping Foreign Clients Evade Dividend Taxes. “Citigroup Inc C.N has been fined \$600,000 by the Financial Industry Regulatory Authority over failing to police derivatives transactions that helped foreign clients avoid taxes on dividends. FINRA, a private-sector regulator of U.S. broker dealers, said Citi failed to supervise and control trading strategies designed partly to evade taxes.” [Reuters, [10/12/09](#)]

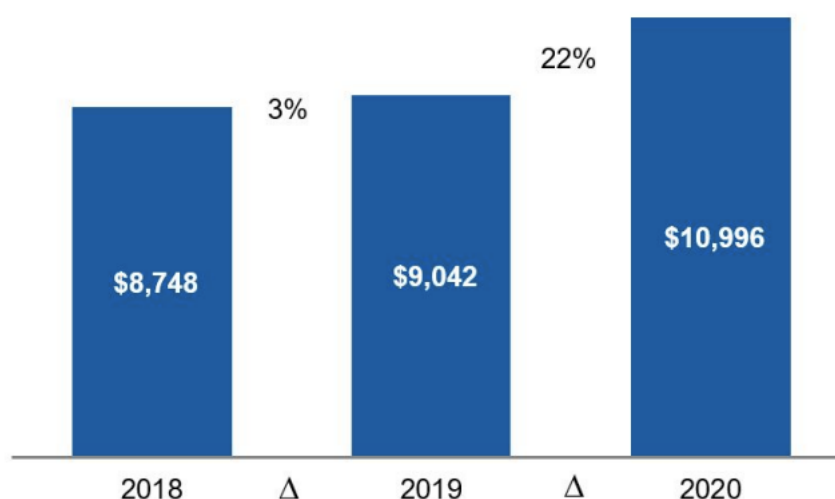
Morgan Stanley Had A Profitable Year In 2020, Reporting Nearly \$11 Billion In Net Income And Rewarding Its CEO With Over \$90 Million In Salary And Company Stock In Addition To Cash Bonuses Over The Past Four Years – While The Company Has A History Of Stashing Billions In Offshore Accounts And Tax Havens And Has Been Caught And Fined By Authorities In The UK And The Netherlands For Its Tax Avoidance Schemes, Including The “Biggest Tax Theft In The History Of Europe.”

Morgan Stanley Reported A Net Income Of Nearly \$11 Billion In 2020—A 22% Increase From 2019.

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Net Income Applicable to Morgan Stanley

(\$ in millions)



[Morgan Stanley 10-K Filing For Year 2020, [12/31/20](#)]

From 2016 To 2020, Morgan Stanley CEO James Gorman Made Just \$7.5 Million In Base Salary, Yet Earned Over \$84 Million In Company Stock

James P Gorman Is The Chairman And CEO Of Morgan Stanley. [Form 14A, Securities Exchange Commission, [04/01/21](#)]

From 2016 To 2020, Gorman Made \$7.5 Million In Base Salary, But Earned \$84,827,928 In Stock Awards:

Year	Base Salary	Total Stock Awards
2016	\$1,500,000	\$9,958,913
2017	\$1,500,000	\$11,383,777
2018	\$1,500,000	\$19,748,977
2019	\$1,500,000	\$23,708,083
2020	\$1,500,000	\$20,048,178
Total:	\$7,500,000	\$84,827,928

An Oxfam Report Found That Morgan Stanley Stashed Over \$7.36 Billion In Offshore Accounts Between 2008 And 2014 And Evaded Over \$5.4 Billion In US Taxes In The Same Period.

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CORPORATION NAME	FEDERAL LOANS, BAILOUTS, LOAN GUARANTEES	PROFITS	FEDERAL INCOME TAX	TOTAL TAX	EFFECTIVE TAX RATE	TAX "BREAKS"	MONEY HELD OFFSHORE	SUBSIDIARIES IN TAX HAVENS	TOTAL LOBBYING
Ford Motor	\$27,578 M	\$22,951 M	-\$7,109 M	-\$7,952 M	-34.6%	\$15,985 M	\$4,300 M	4	\$44 M
General Electric	\$27,989 M	\$144,272 M	-\$5,183 M	\$9,718 M	6.7%	\$40,777 M	\$119,000 M	18	\$161 M
General Motors	\$50,347 M	\$70,945 M	-\$30,050 M ⁽⁴⁾	-\$32,314 M	-45.5%	\$57,145 M	\$7,100 M	21 ⁽⁵⁾	\$67 M
Goldman Sachs	\$910,115 M	\$76,527 M	\$13,382 M	\$24,032 M	31.4%	\$2,752 M	\$24,880 M	20	\$26 M
Hewlett-Packard	\$0	\$40,978 M	\$3,420 M	\$11,678 M	28.5%	\$2,664 M	\$42,900 M	25	\$41 M
Home Depot	\$0	\$44,577 M	\$13,156 M	\$16,159 M	36.2%		\$3,400 M	undisclosed	\$7 M
Honeywell International	\$50 M	\$24,885 M	\$3,342 M	\$6,510 M	26.2%	\$2,200 M	\$15,000 M	5	\$44 M
IBM	\$5 M	\$138,349 M	\$9,993 M	\$32,270 M	23.3%	\$16,152 M	\$61,400 M	15	\$39 M
Intel	\$142 M	\$90,501 M	\$19,792 M	\$24,105 M	26.6%	\$7,570 M	\$23,300 M	14	\$29 M
Johnson & Johnson	\$0	\$111,801 M	\$13,431 M	\$22,912 M	20.5%	\$16,218 M	\$53,400 M	58	\$43 M
JPMorgan Chase	\$1,298,182 M	\$155,072 M	\$24,862 M	\$42,405 M	27.3%	\$11,870 M	\$31,100 M	4	\$47 M
Merck	\$0	\$65,775 M	\$11,306 M	\$14,697 M	22.3%	\$8,282 M	\$60,000 M	121	\$47 M
MetLife	\$20,524 M ⁽⁶⁾	\$28,854 M	\$114 M	\$7,075 M	24.5%	\$3,024 M ⁽⁷⁾	\$4,200 M ⁽⁸⁾	31 ⁽⁹⁾	\$41 M
Microsoft	\$0	\$173,858 M	\$24,143 M	\$38,783 M	22.3%	\$22,067 M	\$108,300 M	5	\$57 M
Morgan Stanley	\$2,117,185 M	\$20,050 M	-\$179 M	\$1,586 M	7.9%	\$5,432 M	\$7,364 M	210	\$23 M

[Oxfam, "Broken At The Top," [4/12/16](#)]

A 2013 Citizens For Tax Justice Report Found That Morgan Stanley Held Over \$7.1 Billion In Unrepatriated Income In Offshore Tax Havens With An Implied Tax Rate Of Just 10%—Less Than A Third Of The Corporate Tax Rate At The Time.

A 2013 Citizens For Tax Justice Report Found That Morgan Stanley Held Over \$7.1 Billion In Unrepatriated Income In Offshore Tax Havens.

Company	Unrepatriated Income (\$B)	Implied Tax Rate (%)
J.P. Morgan Chase & Co.	25,100	23%
Northern Trust	815	22%
Bank of New York Mellon Corp.	4,300	22%
Lockheed Martin	211	21%
Owens Corning	1,210	19%
Paccar	3,900	19%
Viacom	1,680	18%
Goldman Sachs Group	21,690	17%
Gap	1,700	14%
Duke Energy	2,000	14%
Murphy Oil	6,022	12%
Morgan Stanley	7,191	10%
Safeway	1,300	10%
Anixter International	496	10%
Ford Motor	6,600	9%

[Citizens For Tax Justice, "Apple Is Not Alone," [6/03/13](#)]

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[Tax Foundation, [3/14/13](#)]

In 2020 The Dutch Tax Authority Forced Morgan Stanley To Pay Fines As High As \$45 Million For Using Creative Trading Techniques To Evade Dividends Taxes

In 2020 The Dutch Tax Authority Forced Morgan Stanley To Pay Fines As High As \$45 Million For Using Creative Trading Techniques To Evade Dividends Taxes. “Morgan Stanley may owe as much as 42 million euros (\$45 million) to the Netherlands in a tax-avoidance case related to dividend payouts. The Dutch tax authority said Morgan Stanley that engaged in ‘dividend stripping,’ a controversial practice where a shareholder uses a series of trades to lower its tax bill. While the claim was thrown out two years ago, the Amsterdam Court of Appeal overturned that decision in a ruling this week.” [Bloomberg Tax, [5/14/20](#)]

In 2013 The UK Government Found That Morgan Stanley Was Involved In A Tax \$84.8 Million Avoidance Scheme That Was Successfully Challenged In Court.

The UK Government Successfully Challenged A 60 Million Pound Tax Avoidance Scheme Involving Morgan Stanley In 2013. “HM Revenue & Customs has won a GBP60 million court battle over a tax avoidance scheme involving US investment bank Morgan Stanley and FTSE 100 company, Land Securities. [...] Jim Harra, HMRC’s director general for business tax, said, ‘This scheme was flagrant tax avoidance that provided finance to a FTSE 100 company that appeared cheap because the UK taxpayer was expected to pick up a GBP60 million bill.’” [Private Banker International, [3/28/13](#)]

- **60 Million British Pounds Is The Equivalent Of \$84.81 Million In 2021.** [Google Exchange Rate, [Accessed 5/25/21](#)]

The Scheme Involved A Company Called Land Securities Selling Shares To A Cayman Island Morgan Stanley Subsidiary Who Then Inflated The Share Costs , Allowing Land Securities To Buy Back The Shares A Claim A Loss They Could Use As A Tax Deduction. “Under the scheme Land Securities which sold shares in one of its group companies to a Cayman Island subsidiary of Morgan Stanley, which then inflated the value of the shares by pumping money into the subsidiary. Land Securities bought back the shares at the inflated price, claiming that the effect of an existing anti-avoidance rule was that they had made a ‘loss’ of £200 million that could be used as a deduction against tax.” [Private Banker International, [3/28/13](#)]

Morgan Stanley Was Involved In What Was Called “The Biggest Tax Theft In The History Of Europe,” Which Resulted In Multiple Countries Losing \$60 Billion In Via Evaded Taxes.

Morgan Stanley Was Involved In A Scheme Running From 2006 To 2011 That Used A Monetary Maneuver To Produce Two Refunds For A Dividend Tax Paid On One Basket Of Stocks. “The scheme was built around ‘cum-ex trading’ (from the Latin for ‘with-without’): a monetary maneuver to avoid double taxation of investment profits that plays out like high finance’s answer to a David Copperfield stage illusion. Through careful timing, and the coordination of a dozen different transactions, cum-ex trades produced two refunds for dividend tax paid on one basket of stocks. [...]. Outrage in these countries has focused on the City of London, Britain’s answer to Wall Street. Less scrutinized has been the role played by Americans, both individual investors and branches of U.S. investment banks in London, including Morgan Stanley, JPMorgan Chase and Bank of America Merrill Lynch.” [The Chicago Tribune, [2/01/20](#)]

The Scheme Resulted In European Countries Losing \$60 Billion In Tax Revenue In What has Been Called “The Biggest Tax Theft In The History Of Europe,” Which Resulted In Multiple Countries Losing \$60 Billion In Via Evaded Taxes. “Today, the men stand accused of participating in what Le Monde has called ‘the robbery of the century,’ and what one academic declared ‘the biggest tax theft in the history of Europe.’ From 2006 to 2011, these two and hundreds of bankers, lawyers and investors made off with a staggering \$60 billion, all of it siphoned from the state coffers of European countries.” [The Chicago Tribune, [2/01/20](#)]

In 2020, Bank Of America Reported Over \$17.9 Billion In Net Income And Has Rewarded Its CEO With Over \$100 Million In Salary And Company Stock In Addition To Cash Bonuses Since 2016, While The Company Has A History Of Stashing Millions In Offshore Accounts And Tax Havens, Avoiding Paying Millions In Corporate Taxes And Getting Involved In Multiple Tax Avoidance Schemes, One Described As “The Biggest Tax Theft In The History Of Europe”

In 2020 Bank Of America Reported A Net Income Of Over \$17.89 Billion.

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Table 1 **Summary Income Statement and Selected Financial Data**

(Dollars in millions, except per share information)		2020	2019
Income statement			
Net interest income	\$	43,360	\$ 48,891
Noninterest income		42,168	42,353
Total revenue, net of interest expense		85,528	91,244
Provision for credit losses		11,320	3,590
Noninterest expense		55,213	54,900
Income before income taxes		18,995	32,754
Income tax expense		1,101	5,324
Net income		17,894	27,430
Preferred stock dividends		1,421	1,432

[Bank Of America 10-K Filing For Year 2020, [2/24/21](#)]

From 2016 To 2020, Bank Of America CEO Brian Moynihan Made Just \$7.5 Million In Base Salary, But Over \$100 Million In Stock Awards

Brian T Moynihan Is The Chairman And CEO Of Bank Of America. [Form 14A, Securities Exchange Commission, [03/08/21](#)]

From 2016 To 2020, Moynihan Made \$7.5 Million In Base Salary, But \$100,929,731 In Company Stock:

Year	Base Salary	Total Stock Awards
2016	\$1,500,000	\$13,752,000
2017	\$1,500,000	\$19,524,730
2018	\$1,500,000	\$20,552,088
2019	\$1,500,000	\$23,575,105
2020	\$1,500,000	\$23,525,808
Total:	\$7,500,000	\$100,929,731

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Alphabet (Google)	\$0	\$84,902 M	\$12,783 M	\$17,167 M	20.2%	\$12,549 M	\$47,400 M	2	\$73 M
American Express	\$8,986 M	\$42,672 M	\$9,423 M	\$12,982 M	30.4%	\$1,953 M	\$9,700 M	23	\$19 M
American International Group (AIG)	\$232,566 M	-\$77,705 M	-\$28,199 M	-\$20,870 M	26.9%		undisclosed	17	\$31 M
Amgen	\$0	\$35,545 M	\$2,633 M	\$3,994 M	11.2%	\$8,447 M	\$29,300 M	8	\$70 M
Apple	\$0	\$231,107 M	\$50,771 M	\$59,823 M	25.9%	\$21,064 M	\$181,100 M	3	\$17 M
AT&T	\$0	\$87,076 M	\$18,671 M	\$20,817 M	23.9%	\$9,660 M	undisclosed	undisclosed	\$113 M
Bank of America	\$3,495,477 M	\$33,361 M	-\$7,050 M	\$3,346 M	10.0%	\$8,330 M	\$17,200 M	22	\$24 M

[Oxfam, "Broken At The Top," [4/12/16](#)]

A 2016 Oxfam Report Found That Over 84% Of Bank Of America's Subsidiaries Were Located In Offshore Tax Havens While The Company Only Disclosed 6.8% Of Said Subsidiaries On Their 10-K Filings.

A 2016 Oxfam Report Found That 84.4% Of Bank Of America's Subsidiaries Were Located In Offshore Tax Havens As Of 2014.

	All Foreign Subsidiaries	In Tax Havens ²	Percent in Tax Havens
Bank of America Corporation	308	260	84.4%
Citigroup	890	583	65.5%
JP Morgan Chase & Co.	2673	2588	96.8%
Wells Fargo & Co.	136	135	99.3%
TOTAL	4007	3566	89.0%

[Oxfam, [1/11/16](#)]

The Same Study Also Found That Bank Of America Only Reported 6.8% Of These Subsidiaries On Their 2014 10-K SEC Report.

	Federal Reserve	2014 10K	Percent disclosed on 10K
Bank of America Corporation	1518	103	6.8%
Citigroup	1620	279	17.2%
JP Morgan Chase & Co.	5516	49	0.9%
Wells Fargo & Co.	2034	1427	70.2%
TOTAL	10688	1858	17.4%

[Oxfam, [1/11/16](#)]

A 2013 Citizens For Tax Justice Report Found That Bank Of America Held \$17.2 Billion In Unrepatriated Income In Offshore Tax Havens With An Implied Tax Rate Of Just 25%—Ten Percent Lower Than The Corporate Tax Rate At The Time.

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55 Companies That Disclose Likely Tax Payments from Repatriation

Company Name	Unrepatriated Income (\$Millions)	Estimated Tax Bill (\$Millions)	Implied Tax Rate
Shaw Group	\$ 288	\$ 111	39%
Express Scripts	66	24	37%
Amgen	22,200	7,900	36%
Advanced Micro Devices	386	137	35%
Qualcomm	16,400	5,800	35%
Gilead Sciences	7,250	2,540	35%
Wynn Resorts	334	117	35%
Eli Lilly	20,980	7,343	35%
AK Steel Holding	24	8	35%
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Symantec	2,800	830	30%
United States Steel	2,700	800	30%
Jacobs Engineering Group	26	8	29%
Wells Fargo	1,300	367	28%
Citigroup	42,600	11,500	27%
Walt Disney	566	150	27%
MDU Resources	8	2	26%
CH2M Hill	161	42	26%
Biogen Idec	3,300	850	26%
Air Products & Chemicals	5,278	1,333	25%
Bank of America Corp.	17,200	4,300	25%
FMC Technologies	1,279	317	25%

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[Tax Foundation, [3/14/13](#)]

The Massachusetts Appellate Tax Board Ruled In 2008 That Bank Of America Owed The State \$53 Million After Two Of Its Real Estate Trusts Engaged In “Sham Tax-Avoidance Transactions.”

The Massachusetts Appellate Tax Board Ruled In 2008 That Bank Of America Owed The State \$53 Million After Two Of Its Real Estate Trusts Engaged In “Sham Tax-Avoidance Transactions.” “Bank of America Corp. owes the state \$53 million, the Massachusetts Department of Revenue said, after a tax board ruled two of its real estate trusts engaged in sham tax-avoidance transactions that ‘lacked business purpose and economic substance.’ The ruling, released Thursday by the Massachusetts Appellate Tax Board, which oversees tax disputes, marks a victory for the state Department of Revenue in one of several actions it has brought against what it calls captive trusts, which it says were set up to dodge taxes.” [Boston Globe, [2/23/08](#)]

Bank Of America Merrill Lynch Was Involved In What Was Called “The Biggest Tax Theft In The History Of Europe,” Which Resulted In Multiple Countries Losing \$60 Billion In Tax Revenue And Then Attempted To Hide Payments Linked To The Scheme.

Bank Of America Merrill Lynch Was Involved In A Scheme Running From 2006 To 2011 That Used A Monetary Maneuver To Produce Two Refunds For A Dividend Tax Paid On One Basket Of Stocks. “The scheme was built around ‘cum-ex trading’ (from the Latin for ‘with-without’): a monetary maneuver to avoid double taxation of investment profits that plays out like high finance’s answer to a David Copperfield stage illusion. Through careful timing, and the coordination of a dozen different transactions, cum-ex trades produced two refunds for dividend tax paid on one basket of stocks. [...]. Outrage in these countries has focused on the City of London, Britain’s answer to Wall Street. Less scrutinized has been the role played by Americans, both individual investors and branches of U.S. investment banks in London, including Morgan Stanley, JPMorgan Chase and Bank of America Merrill Lynch.” [The Chicago Tribune, [2/01/20](#)]

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Merrill Lynch Attempted To Hide Payments Linked To The Scheme. “Bank of America Corp.’s Merrill Lynch unit was among lenders getting a share of the profit of clients’ so-called Cum-Ex trades, and tried to hide payments linked to the controversial tax-driven practice by masking them via unrelated future transactions, a former trader said in a German court.” [Bloomberg Quint, [10/03/19](#)]

Bank Of America Used Its Federally Insured Unit To Finance Billions In Controversial Stock Trades By Its European Investment Banking Arm That Allowed Its Clients To Avoid Dividend Taxes.

Bank Of America Used Its Federally Insured Unit To Finance Billions In Controversial Stock Trades That Allowed Their Taxes To Avoid Dividend Taxes. “Federally-insured banking unit of BoA financed billions of dollars in such trades, according to WSJ report Bank of America used its government-backed U.S. banking to finance controversial trades that helped clients avoid taxes, the Wall Street Journal (WSJ) reported on Wednesday, citing internal documents and people familiar with the matter. The bank last year started phasing out the practice of using funds from the U.S. unit to finance transactions by its European investment-

banking arm that, among other things, helped hedge funds avoid taxes on stock dividends.” [Al Jazeera, [2/11/15](#)]

Bank Of America Used Funding From Its FDIC Insured Branch To Finance Transactions By Its European Investment Banking Arm That Would Help Hedge Funds Avoid Dividend Taxes. “Federally-insured banking unit of BoA financed billions of dollars in such trades, according to WSJ report Bank of America used its government-backed U.S. banking to finance controversial trades that helped clients avoid taxes, the Wall Street Journal (WSJ) reported on Wednesday, citing internal documents and people familiar with the matter. The bank last year started phasing out the practice of using funds from the U.S. unit to finance transactions by its European investment-banking arm that, among other things, helped hedge funds avoid taxes on stock dividends.” [Al Jazeera, [2/11/15](#)]

Bank Of America’s UK Branch Paid No Corporate Income Tax In 2014.

Bank Of America’s UK Branch Paid No Corporate Income Tax In 2014. “Seven of the biggest investment banks operating in London paid little or no tax in Britain last year, despite reporting billions of dollars in profits, a Reuters analysis of corporate filings shows. [...] Five of the banks – JP Morgan, Bank of America Merrill Lynch, Deutsche Bank AG, Nomura Holding and Morgan Stanley – said their main UK arms paid no corporation tax, as Britain calls corporate income tax. The filings show that the seven banks, which also include Goldman Sachs and UBS AG, used tax breaks and tax losses generated during the banking crisis to reduce their tax bills.” [Business Insider, [12/23/15](#)]

Wells Fargo Reported Over \$3.3 Billion In Net Income And Has Rewarded Its CEO Over \$45 Million In Salary And Company Stock In Addition To A Cash Bonus Over The Past Two Years – While The Company Has A History Of Stashing Billions In Offshore Accounts And Tax Havens To Avoid Taxes And Has Been Found Guilty Of Participating In A Foreign Tax Shelter That Generated Hundreds Of Millions In Tax Credits.

Wells Fargo Reported Over \$3.3 Billion In Net Income In 2020.

According To The Wall Street Journal, Wells Fargo Reported Over \$3.3 Billion In Net Income In 2020.

Consolidated Net Income	3,586
Minority Interest Expense	285
Net Income	3,301

[Wall Street Journal, [Accessed 5/25/21](#)]

From 2016 To 2020, Wells Fargo CEO Charles Scharf Earned \$2.9 Million In Base Salary And Over \$42 Million In Company Stock

Charles W Scharf Is The President And CEO Of Wells Fargo. [Form 14A, Securities Exchange Commission, [03/16/21](#)]

From 2016 To 2020, Scharf Earned \$2,998,084 In Base Salary And Received \$42,330,536 In Stock Awards.

Year	Base Salary	Total Stock Awards
2016	N/A	N/A
2017	N/A	N/A
2018	N/A	N/A
2019	\$498,084	\$ 28,788,490.00
2020	\$2,500,000	\$ 13,542,046.00
Total:	\$2,998,084	\$ 42,330,536.00

An Oxfam Report Found That Wells Fargo Stashed \$1.8 Billion In Offshore Accounts Between 2008 And 2014 And Evaded Over \$6 Billion In US Taxes In The Same Period.

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PepsiCo	\$0	\$58,118 M	\$7,577 M	\$14,638 M	25.2%	\$5,703 M	\$37,800 M	132	\$31 M
Pfizer	\$0	\$99,903 M	\$9,234 M	\$18,977 M	19.0%	\$15,989 M	\$74,000 M	151	\$94 M
Phillips 66 ⁽¹⁰⁾	\$2 M	\$25,705 M	\$7,197 M	\$8,394 M	32.6%	\$626 M	\$2,000 M	17 ⁽¹¹⁾	\$9 M
Procter & Gamble	\$450,000	\$109,750 M	\$12,250 M	\$25,615 M	23.3%	\$12,798 M	\$45,000 M	38	\$31 M
Prudential Financial	\$2,457 M	\$10,677 M	\$406 M	\$1,857 M	17.4%	\$1,880 M	\$2,396 M	39	\$56 M
Qualcomm	\$0	\$39,943 M	\$1,969 M	\$7,254 M	18.2%	\$6,726 M	\$25,700 M	3	\$44 M
Twenty-First Century Fox, Inc.	\$0	\$27,945 M	\$2,814 M	\$4,489 M	16.1%	\$5,292 M	\$975 M	2	\$38 M
United Technologies	\$43 M	\$50,119 M	\$2,733 M	\$13,735 M	27.4%	\$3,807 M	\$28,000 M	28	\$91 M
UnitedHealth Group	\$250,000	\$52,967 M	\$18,145 M	\$19,574 M	37.0%		\$391 M	17	\$24 M
US Bancorp	\$6,599 M	\$41,045 M	\$8,964 M	\$10,613 M	25.9%	\$3,753 M	undisclosed	10	\$8 M
Verizon Communications	\$1,479 M	\$98,938 M	\$1,925 M	\$15,677 M	15.8%	\$18,951 M	\$1,300 M	undisclosed	\$110 M
Wal-Mart Stores	\$0	\$167,056 M	\$36,898 M	\$53,878 M	32.3%	\$4,592 M	\$23,300 M	75	\$48 M
Walt Disney	\$0	\$58,252 M	\$13,983 M	\$20,134 M	34.6%	\$254 M	\$1,900 M	7	\$30 M
Wells Fargo	\$330,432 M	\$158,927 M	\$23,931 M	\$49,531 M	31.2%	\$6,093 M	\$1,800 M	98	\$38 M

[Oxfam, "Broken At The Top," [4/12/16](#)]

A 2016 Oxfam Report Found That Over 99% Of Wells Fargo's Subsidiaries Were Located In Offshore Tax Havens While The Company Did Not Disclose Over 30% Of Said Subsidiaries On Their 10-K Filings.

A 2016 Oxfam Report Found That 99.3% Of Well Fargo's Subsidiaries Were Located In Offshore Tax Havens As Of 2014.

	All Foreign Subsidiaries	In Tax Havens ²	Percent in Tax Havens
Bank of America Corporation	308	260	84.4%
Citigroup	890	583	65.5%
JP Morgan Chase & Co.	2673	2588	96.8%
Wells Fargo & Co.	136	135	99.3%
TOTAL	4007	3566	89.0%

[Oxfam, [1/11/16](#)]

The Same Study Also Found That Bank Of America Only Reported 70.2% Of These Subsidiaries On Their 2014 10-K SEC Report.

	Federal Reserve	2014 10K	Percent disclosed on 10K
Bank of America Corporation	1518	103	6.8%
Citigroup	1620	279	17.2%
JP Morgan Chase & Co.	5516	49	0.9%
Wells Fargo & Co.	2034	1427	70.2%
TOTAL	10688	1858	17.4%

[Oxfam, [1/11/16](#)]

A 2013 Citizens For Tax Justice Report Found That Wells Fargo Held \$1.3 Billion In Unrepatriated Income In Offshore Tax Havens With An Implied Tax Rate Of Just 28% —Below The Corporate Tax Rate Of 35% At The Time.

A 2013 Citizens For Tax Justice Report Found That Wells Fargo Held \$1.3 Billion In Unrepatriated Income In Offshore Tax Havens.

55 Companies That Disclose Likely Tax Payments from Repatriation

Company Name	Unrepatriated Income (\$Millions)	Estimated Tax Bill (\$Millions)	Implied Tax Rate
Shaw Group	\$ 288	\$ 111	39%
Express Scripts	66	24	37%
Amgen	22,200	7,900	36%
Advanced Micro Devices	386	137	35%
Qualcomm	16,400	5,800	35%
Gilead Sciences	7,250	2,540	35%
Wynn Resorts	334	117	35%
Eli Lilly	20,980	7,343	35%
AK Steel Holding	24	8	35%
Western Digital	6,300	2,100	33%
Tenneco	728	239	33%
Nike	5,500	1,800	33%
Dell	19,000	6,200	33%
Baxter International	10,600	3,400	32%
Microsoft	60,800	19,400	32%
Apple	82,600	26,071	32%
American Express	8,500	2,600	31%
Oracle	20,900	6,300	30%
Symantec	2,800	830	30%
United States Steel	2,700	800	30%
Jacobs Engineering Group	26	8	29%
Wells Fargo	1,300	367	28%

[Citizens For Tax Justice, "Apple Is Not Alone, [6/03/13](#)]

The Corporate Income Tax In 2013 For Income Above \$18.33 Million Was 35%

Corporate Income Tax		
15%	>	\$0
25%	>	\$50,000
34%	>	\$75,000
39%	>	\$100,000
34%	>	\$335,000
35%	>	\$10,000,000
38%	>	\$15,000,000
35%	>	\$18,333,333

[Tax Foundation, [3/14/13](#)]

In 2017 A Federal Court Found That Wells Fargo Was Liable For A 20% Negligence Penalty For Participating In A Foreign Tax Shelter That Generated \$350 Million In Tax Credits.

A Federal Court Found That Wells Fargo Was Liable For A 20% Negligence Penalty For Participating In A Foreign Tax Shelter That Generated \$350 Million In Tax Credits. "A federal court in Minneapolis has

found Wells Fargo liable for a 20 percent negligence penalty for participating in a tax shelter sold by Barclays Bank that generated \$350 million in foreign tax credits.” [Accounting Today, [5/25/17](#)]

The Tax Shelter Involved Complex Financial Transactions In Which Wells Fargo Would Subject Some Of its Income-Producing Assets To UK Taxation In A Barclay’s Managed UK Trust And Then Offset It With US Tax Credits And Barclays Would In Term Compensate Wells Fargo. “The long-running tax litigation arose from a complex transaction that Wells Fargo engaged in with Barclays called STARS, short for Structured Trust Advantaged Repackaged Securities. In the transaction, Wells Fargo would voluntarily subject some of its income-producing assets to U.K. taxation by placing them in a trust with a U.K. trustee. It would then offset those U.K. taxes by claiming foreign-tax credits on its U.S. returns. Barclays would in turn get significant U.K. tax benefits as a result of Wells Fargo’s actions and it would compensate Wells Fargo for engaging in STARS by making a monthly “Bx payment.” Wells Fargo claimed foreign-tax credits for the U.K. taxes that it paid in connection with STARS, but the IRS disallowed the credits on the ground that STARS was a sham and violated the “economic substance” requirements.” [Accounting Today, [5/25/17](#)]

Goldman Sachs Reported Over \$9 Billion In Profit During 2020 And Rewarded Its CEO With Over \$62 Million In Salary And Company Stock In Addition To Cash Bonuses Over The Past Four Years – While The Company Has A History Of Stashing Billions In Offshore Accounts And Tax Havens To Dodge Taxes, Setting Up “Illegitimate Tax Avoidance Devices” All Around The World

Goldman Sachs Reported Net Earnings Of Nearly \$9.45 Billion In 2020.

Goldman Sachs Reported Net Earnings Of Nearly \$9.45 Billion In 2020.

Financial Overview

The table below presents an overview of our financial results and selected financial ratios.

\$ in millions, except per share amounts	Year Ended December		
	2020	2019	2018
Net revenues	\$44,560	\$36,546	\$36,616
Pre-tax earnings	\$12,479	\$10,583	\$12,481
Net earnings	\$ 9,459	\$ 8,466	\$10,459
Net earnings to common	\$ 8,915	\$ 7,897	\$ 9,860
Diluted EPS	\$ 24.74	\$ 21.03	\$ 25.27
ROE	11.1%	10.0%	13.3%
ROTE	11.8%	10.6%	14.1%
Net earnings to average total assets	0.8%	0.9%	1.1%
Return on average shareholders’ equity	10.3%	9.4%	12.3%
Average equity to average assets	8.2%	9.3%	8.8%
Dividend payout ratio	20.2%	19.7%	12.5%

[Goldman Sachs 10-K Filing For Year 2020, [2/19/21](#)]

From 2016 To 2020, Goldman Sachs CEO David Solomon Made \$9.3 Million In Base Salary, But Over \$53 Million In Company Stock

David Solomon Is The Chairman And CEO Of Goldman Sachs. [Form 14A, Securities Exchange Commission, [03/19/21](#)]

From 2016 To 2020, Solomon Earned \$9,325,000 In Base Salary And Received \$53,083,029 In Stock Awards.

Year	Base Salary	Total Stock Awards
2016	\$1,587,500	-
2017	\$1,850,000	\$ 8,547,708.00
2018	\$1,887,500	\$ 12,775,034.00
2019	\$2,000,000	\$ 14,724,012.00
2020	\$2,000,000	\$ 17,036,275.00
Total:	\$9,325,000	\$53,083,029.00

An Oxfam Report Found That Goldman Sachs Stashed \$24.8 Billion In Offshore Accounts Between 2008 And 2014 And Evaded Over \$2.7 Billion In US Taxes In The Same Period.

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CORPORATION NAME	FEDERAL LOANS, BAILOUTS, LOAN GUARANTEES	PROFITS	FEDERAL INCOME TAX	TOTAL TAX	EFFECTIVE TAX RATE	TAX "BREAKS"	MONEY HELD OFFSHORE	SUBSIDIES IN TAX HAVENS	TOTAL LOBBYING
Ford Motor	\$27,578 M	\$22,951 M	-\$7,109 M	-\$7,952 M	-34.6%	\$15,985 M	\$4,300 M	4	\$44 M
General Electric	\$27,989 M	\$144,272 M	-\$5,183 M	\$9,718 M	6.7%	\$40,777 M	\$119,000 M	18	\$161 M
General Motors	\$50,347 M	\$70,945 M	-\$30,050 M ^(a)	-\$32,314 M	-45.5%	\$57,145 M	\$7,100 M	21 ⁽⁵⁾	\$67 M
Goldman Sachs	\$910,115 M	\$76,527 M	\$13,382 M	\$24,032 M	31.4%	\$2,752 M	\$24,880 M	20	\$26 M

[Oxfam, "Broken At The Top," [4/12/16](#)]

A 2013 Citizens For Tax Justice Report Found That Goldman Sachs Held \$21.69 Billion In Unrepatriated Income In Offshore Tax Havens With An Implied Tax Rate Of Just 17% —Half Of The 35% Corporate Income Tax In 2013.

A 2013 Citizens For Tax Justice Report Found That Goldman Sachs Held \$21.69 Billion In Unrepatriated Income In Offshore Tax Havens, On Which They Paid Only A 17% Effective Tax On.

Washington Post	64	15	23%
J.P. Morgan Chase & Co.	25,100	5,700	23%
Northern Trust	815	180	22%
Bank of New York Mellon Corp.	4,300	930	22%
Lockheed Martin	211	45	21%
Owens Corning	1,210	235	19%
Paccar	3,900	740	19%
Viacom	1,680	294	18%
Goldman Sachs Group	21,690	3,750	17%
Gap	1,700	237	14%
Duke Energy	2,000	275	14%
Murphy Oil	6,022	709	12%

[Citizens For Tax Justice, "Apple Is Not Alone," [6/03/13](#)]

The Corporate Income Tax In 2013 For Income Above \$18.33 Million Was 35%

Corporate Income Tax		
15%	>	\$0
25%	>	\$50,000
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34%	>	\$335,000
35%	>	\$10,000,000
38%	>	\$15,000,000
35%	>	\$18,333,333

[Tax Foundation, [3/14/13](#)]

In 2018, Goldman Sachs Was Fined €89 Million By UK Courts For Avoiding €226 Million In Corporate Taxes In A 2006 Tax Avoidance Scheme.

HEADLINE: “Goldman Sachs And Cargill Fined €89M In UK Tax Avoidance Case.” [EuropeanCEO, [10/24/18](#)]

October 2018: Goldman Sachs Was Found Guilty And Fined €89m In UK Courts Of A Tax Avoidance Scheme Set Up In 2006-2007. “US titans Cargill and Goldman Sachs have been found guilty of tax avoidance and subsequently handed a £79m (€89m) bill. The case, which is one of the largest corporation tax triumphs for HM Revenue and Customs (HMRC), relates to a tax avoidance scheme set up in 2006-07 when the two firms jointly owned the now-defunct Teesside power station.” [EuropeanCEO, [10/24/18](#)]

Goldman Sachs, With Cargill, Took Over Teesside Power In 2001, Which Subsequently Filed For US Bankruptcy, Setting Up A Jersey-Based Company To Avoid Paying Corporate Taxes On Around £200m. “Goldman Sachs, together with Cargill’s private equity division, took over Teesside Power (TP) in 2001. TP owned the gas-fired power plant in North Yorkshire and was left facing millions of pounds worth of inherited debts after the previous owner, Enron, collapsed earlier that same year. On the recommendation of auditor EY, TP filed for US bankruptcy. This allowed it to reclaim debts owed by other Enron subsidiaries that had purchased electricity from the plant. It also set up a Jersey-based company to avoid paying corporation tax on around £200m (€226m) of share conversions.” [EuropeanCEO, [10/24/18](#)]

In 2005, Goldman Sachs Was Found By British Tax Authorities To Have Set Up “Illegitimate Tax Avoidance Devices” To Avoid Paying Taxes On Employee Bonuses, Yet Refused To Pay Its Penalty For Years.

Goldman Sachs, Along With 21 Investment Banks And Firms “Purchased Blueprints For An Avoidance Scheme Called An Employee Benefit Trust,” In Which Employee Bonuses Were “Indirectly Invested Into Elaborate Share Option Schemes.” “Goldman also begrudged paying its share of UK national insurance on the six-figure bonuses. Court judgments disclose that a typical Goldman bonus to a junior banker was £143,000 in 1998, and £191,000 the following year. The company, along with 21 investment banks and other firms, purchased blueprints for an avoidance scheme called an employee benefit trust (EBT). The bonuses were indirectly invested into elaborate share option schemes.” [The Guardian, [10/11/11](#)]

In 2005, UK Tax Authorities Found Employee Benefit Trusts To Be “Illegitimate Tax Avoidance Devices,” Yet Goldman Sachs “Refused to Pay Its [...] Bill.” “It took the Revenue until 2005 to demonstrate

in court that these EBTs were merely illegitimate tax avoidance devices. The 21 other firms surrendered, and handed over what they owed. But Goldman Sachs refused to pay its £30.81m bill. Instead the city firm Freshfields and the tax QC David Goldberg fought tooth and nail on Goldman's behalf through the courts. By 2010, according to a public judgment, the unpaid bill with accumulated interest had mounted to £40m.” [The Guardian, [10/11/11](#)]