

Answer Key

ABC, the U.S. company that applies innovative technology to manufacture diversified industrial and consumer products, has a strong global presence. Among the 200 countries where ABC sells its products, Germany and China are quite strong for the firm. Assume ABC has two wholly owned, and foreign incorporated, subsidiaries in those nations: ABC Germany and ABC China.

Last year (2011) ABC Germany earned 400,000,000 USD and ABC China 600,000,000 USD (both figures are pretax earnings). Suppose these two subsidiaries paid out all after-tax earnings back to the parent company, ABC U.S., headquartered in St. Paul, MN, in the form of dividend.

Please use the tax rates below for calculations:

U.S. corporate tax rate: 35%
 German corporate tax rate: 40%
 German dividend withholding tax: 0%
 Chinese corporate tax rate: 25%
 Chinese dividend withholding tax: 10%

1. How much corporate tax did ABC Germany pay to the German government?

$400,000,000 \times 40\% = \160 million

2. How much corporate tax did ABC Germany pay to the U.S. government?

\$0

3. How much tax did ABC U.S. pay to the German government for receiving the dividend from ABC Germany?

$(400,000,000 - 160,000,000) \times 0\% = \0

4. What kind of tax credit (foreign or indirect) could ABC U.S. get from the payments ABC Germany made in question 1?

Indirect

5. How much tax did ABC U.S. owe the U.S. government for its earnings from ABC Germany after all the tax credits are applied? (Hint: The figure could be negative to account for effect on overall tax liability.)

$400,000,000 \times 35\% - 400,000,000 \times 40\% = 0 = \0 million

6. How much corporate tax did ABC China pay to the Chinese government?

$600,000,000 \times 25\% = \150 million

7. How much dividend did ABC China send back to its parent company, ABC U.S.?

$600,000,000 - 150,000,000 = \450 million

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F Rizvi



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Table of Contents Got Ballot Answers Icivis

1. Understanding the eBook Got Ballot Answers Icivis
 - The Rise of Digital Reading Got Ballot Answers Icivis
 - Advantages of eBooks Over Traditional Books
2. Identifying Got Ballot Answers Icivis
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Got Ballot Answers Icivis
 - User-Friendly Interface
4. Exploring eBook Recommendations from Got Ballot Answers Icivis
 - Personalized Recommendations

- Got Ballot Answers Icivis User Reviews and Ratings
- Got Ballot Answers Icivis and Bestseller Lists
- 5. Accessing Got Ballot Answers Icivis Free and Paid eBooks
 - Got Ballot Answers Icivis Public Domain eBooks
 - Got Ballot Answers Icivis eBook Subscription Services
 - Got Ballot Answers Icivis Budget-Friendly Options
- 6. Navigating Got Ballot Answers Icivis eBook Formats
 - ePub, PDF, MOBI, and More
 - Got Ballot Answers Icivis Compatibility with Devices
 - Got Ballot Answers Icivis Enhanced eBook Features
- 7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Got Ballot Answers Icivis
 - Highlighting and Note-Taking Got Ballot Answers Icivis
 - Interactive Elements Got Ballot Answers Icivis
- 8. Staying Engaged with Got Ballot Answers Icivis
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Got Ballot Answers Icivis
- 9. Balancing eBooks and Physical Books Got Ballot Answers Icivis
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Got Ballot Answers Icivis
- 10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
- 11. Cultivating a Reading Routine Got Ballot Answers Icivis
 - Setting Reading Goals Got Ballot Answers Icivis
 - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Got Ballot Answers Icivis
 - Fact-Checking eBook Content of Got Ballot Answers Icivis

- Distinguishing Credible Sources
- 13. Promoting Lifelong Learning
 - Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
- 14. Embracing eBook Trends
 - Integration of Multimedia Elements
 - Interactive and Gamified eBooks

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