



## President Obama's 2011 Budget Proposes International Tax Reform

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Earlier this month, the Obama Administration ("Administration") presented its 2011 federal budget to Congress. The Administration proposes tax reforms, including major reforms to U.S. taxation of foreign source income and foreign activities, intended to raise \$122 billion in revenue. The Administration contends that these reforms will stimulate the struggling U.S. economy by fostering domestic job growth and reducing incentives for U.S. companies to ship jobs overseas.

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