The lecture will discuss the current debate over whether the United States should tax the worldwide income of US businesses or only income generated within the United States. The United States currently has a mixed system, which permits aggressive taxpayers to pay little to no United States income tax, or even in some instances to be subsidized by the US government. In response, several commentators have proposed that the US abandon taxing the worldwide income of US business and adopt a territorial system similar to that used by many European countries. Professor Peroni rejects this idea, proposing a revised version of worldwide taxation that would more fairly allocate the US tax burden among its taxpayers than either the current regime or the territorial proposals.