

# JAMES R. CONSULTANT, CPA

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*Results-oriented international tax professional with track record of driving value through creation of efficient, forward-looking and versatile tax structure. Expert proficiency in cross-functional teaming with tax, transfer pricing, legal, accounting, treasury, valuation and other key stakeholders to ensure successful execution of planned transactions.*

## COMPANY XYZ

January 2010 – Present

*International Tax Senior Manager, Chicago, Illinois*

The international team advises on issues related to areas such as M&A, Divestitures, and Foreign Tax Credit Strategies.

### Tax Advisory

- **Divestiture:** As part of multi-billion dollar spin-off of US publicly traded company, planned and managed separation of combined foreign businesses, minimizing US tax by qualifying the majority of foreign separations as tax-free spinoffs. Collaborated with foreign teams in more than 15 jurisdictions to minimize foreign CIT, VAT/GST, WHT, Transfer Taxes and CGT, while utilizing US tax attributes to repatriate more than \$250m in cash tax-free.
- **Repatriation:** Managed planning, modeling, and creation of a structure which allowed annual tax-free repatriation of more than \$70m via affirmative use of the CFC netting rules.
- **Analytics:** Led international quantitative studies, including earnings and profits, tax pool and tax basis studies, and leveraged the results of the studies to support valuable tax planning initiatives.
- **Mergers & Acquisitions:** Acted as strategic adviser for private equity investors to assess the attractiveness of several consumer-oriented targets by performing market evaluation and identifying expansion plans.

### Compliance

- **Planning:** Federal, state and foreign income tax planning and compliance. Prepared/Reviewed Consolidated C Corporation returns.
- **Regulatory Changes:** Applied accounting method changes and fixed asset studies to help clients comply with the Internal Revenue Service regulations and provide significant tax savings.

### People and Practice Leadership

- **Practice Management:** Helped build solutions offerings in practice area. Generated X% revenue growth in 2 years by leading client proposals and relationships, recruiting new talent, and developing intellectual property.
- **Leadership:** Recognized as exceptional people manager, consistently rated in top 10% of peer group in both performance and upward feedback. Average project consisted of 6 tax consultants and 12 person client teams.

## COMPANY ABC

January 2005 – December 2009

*Tax Manager, Chicago, Illinois*

The team advised on compliance and tax-savings solutions for international companies based in the U.S.

- **Cross-Border:** Analyzed the U.S. tax consequences of cross-border transactions, including financing, restructuring and repatriation planning for multinational clients.
- **Large-Scale Compliance:** Managed large-scale compliance projects that included engagement administration (budgeting, staffing, and scheduling) as well as technical compliance issues including foreign tax credit calculations and analysis.
- **Tax Savings:** Restructured supply chains to minimize taxation through establishment of principal entities, contract manufacturing arrangements, documenting qualification for the manufacturing exception to foreign base company sales income, and obtaining targeted tax rulings. Impact was over \$10M in client tax savings.

UNIVERSITY, Location, State

2005

*Masters in Taxation*

UNIVERSITY, Location, State

2003

*Bachelor of Science in Accounting*