



Kevin Kiernan, CPA, MST
TPA Global Member

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Professional Background

- Kevin is the founding member and principal of Global Tax Support LLC.
- Over 25 years experience in international taxation and transfer pricing.
- Led international tax function for two U.S.-based multinationals (\$12B and \$4B) where he was responsible for international tax planning, compliance, and tax audits.
- Masters degree in Taxation (Bryant University) and Bachelor degree in Accounting (Western New England University).
- Member of International Tax Planning Professionals and Tax Effective Supply Chain Management groups.

Proven Track Record

- Deep practical experience and understanding of operational aspects of Transfer Pricing structures.
- Have led multiple transfer pricing design and implementation projects with focus on integration and alignment of business and tax objectives while limiting tax controversy risk.
- Have directed numerous transfer pricing documentation projects to satisfy compliance with U.S. and local country tax requirements including conversions to master file and local file templates.
- Extensive experience in U.S. and foreign country tax and transfer pricing audits, appeals and litigation proceedings.
- Completed several tax efficient repatriation transactions including an “all cash” D reorganization leveraging higher taxed earnings, tax basis recovery, and utilization capital losses.

Capabilities

- Significant experience with operational aspects of transfer pricing systems including monitoring of profit level indicators, contractual profit and loss adjustments, cost sharing adjustments, etc.
- Diverse range of international tax technical knowledge matched with strong analytical skills.
- Experience in various industries (and value chain structures) including consumer products, aerospace, automotive, and defence industries.
- Tax risk analysis for uncertain tax positions (FIN 48).



- Achieved favourable resolution of numerous Mutual Agreement Procedure cases (incl. Canada, UK, France, Germany, Switzerland, and the Netherlands).
- Experienced in working in global markets and developing effective communications across diverse cultural environments.