



JIM CARR

Partner

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Education, licenses & certifications

- BS in Commerce from the University of Virginia, where he was a recipient of a National Merit Scholarship
- MS in Accounting from the University of Virginia, where he was a recipient of the Virginia Society of Certified Public Accountants Graduate Scholarship
- Licensed Certified Public Accountant in the Commonwealth of Virginia
- Licensed Certified Public Accountant in the state of California

Background

Jim is a Partner in KPMG's International Tax practice. He is based in the firm's Silicon Valley office. He is responsible for advising multinational companies on both outbound and inbound tax related issues.

Professional and industry experience

Jim has extensive international experience with transfer pricing issues, international structuring, intangibles planning, withholding taxes, advance pricing agreements, international financing, foreign tax credit planning, international market entry/expansion, international supply chain management, and international trade & customs.

Jim serves clients in the technology, manufacturing, and services sectors. He has specialized expertise in the structuring of tax-efficient international product supply chains and the transfer pricing, income tax, customs, and indirect tax issues associated with the cross-border movement of software, goods, and services.

He has been a member of KPMG's International Tax practice for 23 years and has served in KPMG's Washington DC and Silicon Valley offices.

Selected Publications

The Changing Role of Procurement and Related Tax Considerations. *Supply Chain Management*, BNA International: Special Report (November 2008).

The New Temporary Regulations: What Companies with Existing Cost Sharing Arrangements Should Consider. *Transfer Pricing Report*, Vol. 17, No. 19, BNA Tax Management (February 5, 2009); reprinted in *Daily Tax Report*, BNA, Inc. (March 3, 2009).

New Foreign Dividend Exemption Systems in Japan and the U.K.: Tax Considerations for Distributions from U.S. Subsidiaries. *Tax Management International Journal*, Vol. 38, No. 6, BNA Tax Management (June 12, 2009). An abridged version of this article was translated into Japanese and made available to KPMG clients online.

Proposed Check-the-Box Modifications for Foreign Entities: Potential Impact in the Context of Foreign Base Company Sales Income. *BNA Daily Tax Report*, BNA, Inc. (January 11, 2010).

New Subpart F Proposal in Connection With Outbound Intangible Property Transfers. *Tax Notes International*, Vol. 57, No. 12, Tax Analysts (March 22, 2010).

New Foreign Tax Credit Rules' Potential Impact on the High-Tax Exception for Subpart F Income. *Tax Notes International*, Vol. 61, No. 2, Tax Analysts (January 10, 2011).

Virtual Currency in Virtual Economies: Income Characterization Issues for Social Media Companies. *Tax Notes International*, Vol. 64, No. 8, Tax Analysts (November 21, 2011).

Treatment of Taiwan's Retained Earnings Tax for Purposes of Calculating the Hypothetical Tax Rate Under the Manufacturing Branch Rule. *Tax Management International Journal*, Vol. 40, No. 12, BNA Tax Management (December 9, 2011).

Cloud Computing: U.S. Tax Compliance Complexity for Foreign Subsidiaries. *The Tax Executive*, January-February 2012, Tax Executives Institute (May 9, 2012).

Professional and business affiliations

Jim is a member of the American Institute of Certified Public Accountants.