



Mary K. Thomas, CPA, JD

Partner-in-Charge, International Tax Services

Professional Experience

- More than 25 years of combined tax and accounting experience, including more than 15 years of international tax and IRS examination experience
- Practice emphases in global restructuring and refinancing strategies; cross-border transactional planning and management; transfer pricing compliance, documentation and planning; strategic re-sourcing of income and expenses; global Value Added Tax (VAT), custom duties and tariff compliance/planning; and IRS audit controversy services
- Private sector experience with a medical device manufacturer/distributor as manager of transfer prices and director of international tax
- Advance Pricing Agreement (APA) Program experience by negotiating both unilateral and bilateral APA transfer pricing agreements
- Three years of experience working for Big Four advising on transfer pricing matters

Professional Involvement and Recognition

- Member, Texas Society of Certified Public Accountants (TSCPA), Dallas chapter
- Member, American Institute of Certified Public Accountants (AICPA)

Recent Publications

- "Exporting Manufacturers Gain Tax Savings Potential," *Automation World*, September 2012
- "IC-DISC Offers Tax Advantages for Closely Held Export Companies," *The Tax Adviser*, August 2012
- "The Advance Pricing Agreement (APA) Program in 2010," Baker Tilly International's *Transfer Pricing Alert*, August 2011
- "IRS scrutinizing U.S. source income reports," *Fort Worth Business Press*, August 2011
- "Guest Voices: An IRS offer to come clean," *San Antonio Express-News*, August 2011
- "FinCEN issues FBAR final rules for June 30 filers," *Fort Worth Business Press*, May 2011
- "Impuestos Corporations de EU – Desde la perspectiva de un no residente" ("U.S. Corporate Income Taxes from the Perspective of a Nonresident"), *PLAYERS of Life – San Antonio*, January/February 2011
- "IRS Releases Final Schedule UTP, incorporates Draft Schedule Comments," *Fort Worth Business Press*, November 2010
- "Some tips for dealing with IRS Schedule UTP in 2010," *Fort Worth Business Press*, August 2010
- "IRS Schedule UTP to Require Uncertain Tax Position Disclosures," *Fort Worth Business Press*, August 2010
- "Hire Sets New Requirements for Foreign Account Reporting," *Fort Worth Business Press*, May 2010
- "FBAR Filing Provisions Require Immediate Attention From Taxpayers with Foreign Holdings," *Fort Worth Business Press*, February 2010

Education and Certifications

- Certified Public Accountant, Texas
- Jurisprudence Doctorate, Washington College of Law, American University
- Master of Taxation, The University of Texas at San Antonio
- Bachelor of Business Administration, Accounting, The University of Texas at San Antonio
- Currently meets continuing professional education required by the Texas State Board of Public Accountancy