MICHAEL PEREIRA

Partner

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Function and Specialization

As a leader of the Private Client Solutions practice, which is one of four pillars of the Global Mobility Services practice, Michael provides Canadian, U.S. and cross-border tax advisory and specialized tax compliance services to senior executives and high-net worth individuals with respect to income, estate and trust taxation.

Representative Clients

- ☐ Senior Executives with Various Financial Institutions and Public Companies
- ☐ Owner/Managers of Hedge Funds and Private Equity Funds
- ☐ Owner Managers of Private Corporations and their family

Professional Associations

- ☐ Society of Trust and Estate Tax Practitioners

Education, Licenses & Certifications

- ☐ Masters of Science in US Taxation, Wayne State University (2004)
- ☐ Honours Bachelor of Business Administration, Wilfrid Laurier University (1994)
- ☐ Certified Public Accountant, Illinois (2007)
- ☐ Chartered Accountant, ICAO (1996)
- ☐ CICA In-Depth Tax Courses (Levels I, II, and III)

Background

Michael joined KPMG in 1994 and is currently a partner in the Global Mobility Services (GMS) practice with a focus on servicing high-net worth individuals and senior executives with complex U.S. and Canadian tax issues. In addition to income tax planning and compliance, Michael provides estate and trust planning for U.S. citizens living outside the U.S. and has significant experience working with investment bankers, managers of hedge funds and private equity funds, who have complex compensation packages and complex investments. Michael leads a compliance team that specializes in U.S. information reporting for U.S. individuals living outside the U.S. or with investments outside the U.S. Prior to joining the GMS practice, Michael provided cross border U.S. and Canadian corporate tax services, which allows him to uniquely service individual clients with complex corporate structures.

Professional and Industry Experience

In specializing in the cross border tax issues of senior executives, Michael obtained professional experience in a variety of matters, including:

- Planning and compliance for complex cross border compensation packages, including equity and deferred compensation arrangements
- Insulating Canadians from U.S. estate tax on U.S. investments and U.S.-situs assets
- Advising U.S. citizens and green card holders on the tax implications arising from expatriation from the U.S. and developing strategies to minimize exposure to this tax
- Advising U.S. citizens moving to Canada of the Canadian tax implications of their U.S. trust structures and assist with restructuring to achieve tax efficiency
- Providing U.S. tax consulting and compliance services to U.S. citizens participating in foreign private equity structures, and managing their complex cross-border tax issues
- Assisting U.S. citizens to understand and manage the complex U.S. anti-deferral tax system for interests in foreign corporations, including the passive foreign investment corporation and controlled foreign corporation regimes.
- Working with investment advisors to streamline tax reporting requirements.

Technical Skills

Canadian and U.S. individual income tax, U.S. estate tax, U.S. gift tax, Canadian and U.S. trust tax, U.S. corporate tax

Publications and Speaking Engagements

- Society of Trust and Estate Practitioners (STEP) National Conference, Toronto (2015)
- Federated Press Cross-Border Tax Workshop, Toronto (2012, 2013)
- Co-Editor, Carswell Border Crossings Newsletter

Other Activities

- Chair of Taxation Committee, American Chamber of Commerce (Canada chapter)
- Member of Cross-Border Tax Force, American Institute of Certified Public Accountants
- Past First Vice-President and Finance Committee Member, Windsor-Essex Alzheimer Society