

DONNA R. FRYE



DIRECTOR OF TRANSFER PRICING, UHY ADVISORS MI, INC.

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INDUSTRY EXPERTISE:

- Automotive
- Manufacturing and Distribution
- Retail

ACTIVE & PRIOR PROFESSIONAL MEMBERSHIPS:

- Program Chair – Michigan Women’s Tax Association
- Vice Chair – MICPA International Practice Task Force
- Automation Alley’s International Business Services Advisory Council (IBSAC)
- Member – Financial Executives Inc.
- Member – Inforum Michigan
- Member – Michigan Association of Certified Public Accountants
- Member – American Institute of Certified Public Accountants

Donna has 18 years of transfer pricing knowledge serving multinational clients. Her prior work experience includes Big Four accounting firms as well as a Big Three automotive company.

PROFESSIONAL EXPERIENCE:

- Primarily focused on transfer pricing compliance, planning and controversy services including responding to IRS notices, filing competent authority and advance pricing agreements
- Benchmarking analysis to provide an arm’s length intercompany pricing for tangibles, services and royalties for all industries
- Preparation of transfer pricing documentation reports and benchmarking memos under the US regulations and OECD guidelines
- Preparation of transfer pricing documentation for clients for global transactions, maintaining economic consistency while meeting local regulatory requirements
- Advise clients in creating models and policies for charging services to global affiliates
- Advise clients on the transition in preparing the master file and local file documentation under Action 13 of BEPS
- Reviewing client’s in-house prepared transfer pricing reports and providing review comments and recommendations
- Work with clients on co-sourcing transfer pricing documentation
- Assist clients with disputes and controversy including foreign audits

BACKGROUND:

- Licensed CPA in the state of Michigan
- Prior work experience, including but not limited to: KPMG, FryePartners, BDO, EY and Chrysler Corporation
- M.S. in Taxation, Walsh College
- B.A., Walsh College

THOUGHT LEADERSHIP:

- Frequent speaker on transfer pricing topics
- “An Adjustment: Transfer Pricing Beyond 2021”, MICPA International Practice Webinar, 2021
- “Do What is Right, Not What is Easy”, Michigan Women’s Tax Association 2021 Ethics Conference
- “Transfer Pricing & COVID-19”, MICPA International Tax Practice Workshop, 2020
- “Ethics Post COVID-19”, Michigan Women’s Tax Association 2020 Ethics Webinar
- “LES Michigan Chapter: War Stories in Dealmaking, Innovation and Intellectual Property”, Licensing Executive Society, 2019
- “International Tax Update”, Automation Alley’s Protecting Your Intellectual Property (IP) Seminar, 2019
- “Taxes, Tariffs, and Trade” Panel, 2019 Michigan Minority Procurement Conference

FRYE

PAGE TWO

THOUGHT LEADERSHIP (CONTINUED):

- “Tax Reform: International Tax Planning Strategies and Pitfalls”, UHY LLP Annual Manufacturing Outlook, October 2018
- “International Transactions & The New World Order”, UHY International Tax Seminar, 2018
- “The Impact of BEPS on Transfer Pricing”, MICPA International Practice Morning Workshop, 2018
- “Michigan-Specific Ethics”, Michigan Women's Tax Association 2018 Ethics Seminar