

Bibi Sipra, CPA

ASC 740 and IAS 12 income tax provision · US international tax · Multistate compliance · Australian corporate tax

Tampa Bay, Florida · Remote across the United States or international on-site · Full-time, contract, fractional and interim · Updated November 16, 2026

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AT A GLANCE

Credentials	CPA (Florida, active) · MBA, summa cum laude · BA, University of South Florida St. Petersburg
Experience	10+ years corporate income tax: 7 years at EY (Staff to Senior Manager), independent since 2023
Core strengths	ASC 740 / IAS 12 provision · Form 1118 and Section 904 · BEAT, GILTI, FDDEI · Multistate compliance · Australian MEC groups
Tools	ONESOURCE Income Tax · OneStream · HFM (Smart View) · GoSystem Tax RS · NetSuite · Advanced Excel
Languages	English (native) · Spanish (professional working proficiency)
Next availability	December 2026 — start conversations now for Q1 2027 provision season

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Summary

Bibi Sipra, CPA, MBA, is a Big 4-trained Corporate Tax Executive who leads income tax provision, US international tax and multistate compliance for multinational tax departments and Big 4 firms — available for full-time leadership roles as well as contract, fractional and interim engagements. She spent seven years at Ernst & Young in the Global Compliance & Reporting practice, rising from Tax Staff to Tax Senior Manager, and has taken on project-based engagements with multinational companies and Big 4 firms since 2023. Her corporate income tax experience totals more than ten years.

Her specialties are ASC 740 accounting for income taxes (income tax provision, deferred taxes, valuation allowances, uncertain tax positions, income tax footnotes), US federal and multistate corporate income tax compliance, US international tax (foreign tax credit and Form 1118, Section 904 loss accounts, income sourcing, BEAT, FDDEI (formerly FDII), GILTI (now NCTI), Forms 5471, 5472, 8858 and 8865) and Australian corporate tax for a multiple-entry consolidated (MEC) group. Her recent work adds Pillar Two (GloBE) global minimum tax screening across 47 jurisdictions and the monthly global cash tax reconciliation for a group of about 40 entities. She also works under IFRS (IAS 12) for foreign-parented and private equity-owned groups.

Companies engage her for busy-season surge capacity, interim coverage of a Senior Tax Manager or Tax Director seat, post-acquisition and post-restructuring tax projects, provision insourcing, and technical special projects that would otherwise go to a Big 4 firm. Every contract client to date has extended her a full-time offer: a global drilling services company, a multinational sports media company and Deloitte. She builds AI agents and skills on frontier models to speed up model building, tie-outs and memo drafting, and reviews and ties out every output herself.

Areas of expertise

Accounting for income taxes (ASC 740 and IAS 12)

Annual and quarterly income tax provision; effective tax rate analysis; deferred tax assets and liabilities; valuation allowance analysis and deferred tax asset reversal scheduling; uncertain tax positions (ASC 740-10, formerly FIN 48); income tax footnote and disclosure for Form 10-K, 10-Q and S-1 filings; purchase accounting and opening balance sheet tax entries; carve-out financial statements; stock-based compensation tax effects (ASC 718); return-to-provision true-ups; current tax payable and receivable rollforwards; global cash tax reconciliation and reporting; SOX 404 tax controls; PCAOB audit support; IFRS tax provision for foreign-parented groups.

US federal corporate tax compliance

Form 1120 consolidated returns; book-to-tax differences (Schedule M-3); fixed asset and depreciation (bonus, Section 179, MACRS); Section 263A UNICAP; Section 163(j) interest limitation; net operating loss and Section 382 limitation; consolidated return regulations (Reg. 1.1502) including attribute allocation on deconsolidation; accounting method changes (Form 3115); transaction cost analysis; estimated payments and extensions.

US international tax

Foreign tax credit (Sections 901 and 904) and Form 1118 (all schedules); Section 904 limitation, overall foreign loss (OFL), overall domestic loss (ODL) and separate limitation loss (SLL) accounts (Reg. 1.904(g)-3); Section 861 expense allocation and apportionment; Section 863(b) sourcing of inventory sales; GILTI — now net CFC tested income, NCTI (Section 951A, Form 8992); Subpart F (Sections 951–964); FDDEI, formerly FDII (Section 250, Form 8993); BEAT (Section 59A, Form 8991); Section 267A hybrid rules; Forms 5471, 5472, 8858 and 8865; controlled foreign corporation reporting; transfer pricing coordination (Section 482).

Global minimum tax (OECD BEPS 2.0 Pillar Two)

GloBE jurisdictional effective tax rate screening against the 15% global minimum; mapping a consolidated trial balance to constituent entities and jurisdictions; bridging financial statement tax expense to adjusted covered taxes; recasting deferred tax expense to the 15% minimum rate; purchase accounting adjustments in GloBE income; de minimis and substance-based income exclusion (SBIE) tests; excluded equity gain or loss and debt-release relief; executive summaries of top-up tax exposure by jurisdiction.

Global cash tax and tax reporting operations

Monthly current tax payable and receivable rollforwards by entity; cash taxes paid and refunded; withholding tax; prior-year true-ups; foreign exchange and CTA on tax balances; general ledger tie-out; rollout of new tax reporting forms in a consolidation system, including training local tax teams; cash tax reporting to the C-suite and to budgeting and forecasting teams.

State and local income tax

Multistate corporate income and franchise tax compliance; apportionment and sourcing methodologies; nexus analysis; unitary and combined filing; separate-company states; state NOL tracking; state addbacks; look-back refund reviews; high-volume return review in ONESOURCE Income Tax.

Australian corporate tax

Multiple-entry consolidated (MEC) groups; allocable cost amount (ACA) cost-base resets; capital gains tax events (ITAA 1997); Subdivision 768-G participation exemption; Division 230 taxation of financial arrangements (TOFA); debt deduction creation rules (DDCR) and thin capitalisation; CFC attributable income; intercompany loan write-offs; restructuring add-backs; company tax return calculations and disclosures; coordination with the ATO position and the group's Big 4 advisor.

Leadership and delivery

Tax Account Leader on Big 4 client portfolios; review and sign-off of federal and state returns; management of US staff, offshore (GDS) teams and up to 12 direct reports; engagement budgets, margins, scope and fee negotiation; executive and audit committee communication; technical memo and workpaper design; AI agent and skill development for tax workflows on frontier models, with full technical review.

Professional experience

Corporate Tax Consultant

MARCH 2023 – PRESENT

Project-based, fractional and interim corporate tax engagements with Big 4 firms and multinational companies, administered through Korn Ferry and MBO Partners.

> #### Senior Tax Manager, US International and Australian Tax (contract)
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> **APR 2025 – PRESENT**
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> (APR–NOV 2025; RE-ENGAGED FEB 2026)
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> Global drilling services and products company — private equity-owned multinational, approximately US$1 billion in revenue, operating in Australia, North America, Latin America, Africa and Asia-Pacific. Remote from St. Petersburg, FL (US Eastern).
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> The first engagement covered the year the company went from public to private and ended with a full-time offer (declined). Re-engaged in February 2026 for special projects through November 2026, with an ad-hoc advisory role to follow.
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> - Right hand to the Senior Tax Director on the IFRS income tax provision through the go-private transaction year, then on US international tax and Australian corporate tax special projects.
> - Built the income tax footnote from scratch for the newly created entities that house the acquisition's purchase accounting entries (IFRS permits no pushdown accounting): calculated the deferred taxes, reconciled the entries by entity and by jurisdiction to prevent netting errors, and passed audit with no adjustments.
> - Managed the IFRS-based tax provision through a transaction-year close under compressed deadlines and heavy auditor scrutiny.

- Ran the monthly global current tax payable and cash tax rollforward for about 40 entities in the first year of a new OneStream-based process, tying opening balances, current tax expense, cash taxes paid and refunded (about US$12 million year to date), withholding, true-ups, foreign exchange and reclasses to the general ledger. Walked local tax teams in other jurisdictions, such as Poland, through completing the new OneStream tax forms to cut variances at review, and presented the cash tax picture to the C-suite and the budgeting and forecasting leads.
- Built a fully linked Form 1118 foreign tax credit limitation model (Schedules A through K across all separate categories) with automated tie-outs and a summary dashboard.
- Built a Section 904 overall foreign loss, overall domestic loss and separate limitation loss allocation and recapture model following Reg. 1.904(g)-3, and reconstructed the group's ODL accounts back to 2018.
- Analyzed Section 863(b) sourcing of toll-manufactured versus contract-manufactured inventory for foreign tax credit and FDDEI purposes, and the Reg. 1.1502-9 apportionment of loss accounts to a member leaving the consolidated group.
- Managed a BEAT (Form 8991) analysis following a deconsolidation, reclassifying prior-year Schedule A items and drafting disclosures.
- Prepared the FIRPTA non-USRPHC certification and IRS notice (Reg. 1.897-2(h)) documenting the exemption from a potential US$7 million of Section 1445(e)(3) withholding on a US$70 million distribution from the group's US holding company to its foreign parent.
- Built a Pillar Two (GloBE) global minimum tax sensitivity model for FY2025: mapped the consolidated trial balance from OneStream entity by entity across 47 jurisdictions, recast deferred tax expense to the 15% minimum rate, bridged book tax expense in the audited financial statements to GloBE covered taxes, and tested each jurisdiction's effective tax rate against the 15% minimum. Narrowed potential exposure to seven jurisdictions and documented a technical disposition for each, including excluding purchase accounting income and recasting the related deferred taxes, de minimis and substance-based income exclusion (SBIE) tests, intercompany-driven income, and excluded equity gain or loss and debt-release relief for a capital write-off.
- Prepared all calculations and disclosures for the Australian corporate income tax return, including controlled foreign company (CFC) attributable income from the Australian parent's perspective.
- Built the debt tracing calculation for Australia's new debt deduction creation rules (DDCR) from scratch in their first year of application, with no prior-year model to reference.
- Coordinated the Australian income tax return and restructuring add-backs with the group's Big 4 advisor.

Senior Tax Manager, Multistate Compliance (seasonal contract via MBO Partners)

JUL–NOV 2024; JUL–NOV 2025

Deloitte, Multistate Tax, New York (remote). July-to-November state compliance season.

Deloitte extended a full-time offer.

- Directed and mentored two engagement teams (11 and 8 professionals) preparing and filing more than 495 multistate corporate income tax returns in ONESOURCE Income Tax for companies with $12.4 billion to $50.5 billion in revenue.

- Researched industry-specific sourcing methodologies, group filing methodologies and nexus positions, producing $6 million in look-back state tax savings.
- Resolved complex state tax matters across diverse entities and affiliates and reviewed high-volume return packages before filing.

Senior Tax Manager, Tax Provision (fractional)
JAN 2024 – APR 2024

High-profile multinational sports media and entertainment company with legal entities across Asia-Pacific, EMEA, Latin America, Canada and the United States. Remote (US).

- Transitioned the end-to-end ASC 740 income tax provision from a Big 4 firm to an in-house model, cutting advisory spend 80% with no audit findings; primary contact for executive leadership and external auditors.
- Computed uncertain tax positions, valuation allowances by jurisdiction (including US deferred tax asset reversal scheduling against indefinite-lived intangibles) and ASC 718 stock compensation tax effects; validated global deferred taxes and income taxes payable and receivable.
- Led accounting, legal, treasury and external advisors through the income tax footnote for the annual financial statements; used data tools to shorten the close-to-provision turnaround.
- At the close of the engagement, the company extended a full-time offer and asked to move all of its corporate tax work away from its Big 4 provider to an ongoing direct engagement.

Ernst & Young LLP (EY)
JAN 2016 – MAR 2023 · TAMPA, FLORIDA

Tax Senior Manager — August 2022 – March 2023
Tax Manager — October 2019 – August 2022 (early promotion)
Tax Senior — October 2017 – October 2019
Tax Staff — January 2016 – October 2017

Global Compliance & Reporting practice. Public, private and private equity-backed clients with revenues up to approximately $45 billion in manufacturing and distribution, consumer products and retail, technology, hospitality, insurance brokerage and pharmaceuticals. Ran the Tampa office's largest tax compliance engagement (more than 6,000 hours).

- Tax Account Leader on multiple accounts: direct contact for client executives, scope and fee negotiation, budgets and margin targets, billing and collections, and the pipeline for smaller pursuits.
- Final reviewer and sign-off on federal and multistate consolidated corporate income tax returns; managed up to five year-end provisions in a single cycle, including a public multinational.
- Led ASC 740 audit procedures for SEC filers (Form 10-K and 10-Q), a PCAOB audit tied to a public transaction, a pre-IPO S-1 registration statement and a first-year private equity carve-out audit: valuation allowances, uncertain tax positions, purchase accounting and information produced by the entity (IPE) documentation.
- Owned the global purchase accounting and opening balance sheet workstream for a $37 billion public distributor's acquisition, coordinating foreign component teams, M&A specialists and the assurance team across jurisdictions.

- Reviewed international information reporting and compliance (Forms 5471, 5472 and 8858; BEAT, FDII, Section 163(j), Section 267A) and advised clients through the Tax Cuts and Jobs Act, CARES Act and Inflation Reduction Act, including accounting method changes, transaction costs, debt modifications and tax controversy.
- Delivered a five-business-day year-end provision sign-off for two US subsidiaries of a global industrial group with more than $90 billion in revenue, streamlining the inherited testing approach to lower hours without sacrificing quality.
- Managed US staff, offshore GDS teams and up to 12 direct reports across five or more concurrent accounts; recognized in every review cycle for coaching and for keeping teams calm under deadline pressure.
- Improved engagement economics: identified out-of-scope work that produced a $100,000-plus fee write-up, completed a first-year compliance engagement earlier than the prior year at higher margin, and added state and global compliance billings not originally scoped.
- Facilitated technical tax curriculum at EY National Training for incoming tax professionals in Chicago.

Earlier career

2014

- **CBIZ MHM, LLC, Tampa** — Tax Intern, January 2014 – August 2014: 135 federal returns (Forms 1120, 1120-S, 1065, 1041 and high-net-worth 1040), Forms 5471, 5472, 8858 and FBAR, Section 263A, Section 179 and bonus depreciation.

Industries and company types served

Industries

Industrial manufacturing and distribution · Mining services and drilling products · Technology distribution · Consumer products and grocery retail · Restaurants and franchising · Hospitality and travel · Sports media and entertainment · Live entertainment · Insurance brokerage · Pharmaceuticals and life sciences · Software and SaaS · Building products · Plastics and chemicals distribution

Company types

Fortune 500 and large public companies (SEC registrants) · Private equity-owned portfolio companies · Pre-IPO companies · Companies going from public to private · Foreign-parented US groups (Australian, Canadian, German) · US-parented multinationals with CFCs · Employee-owned (ESOP) companies · Big 4 and national accounting firms needing loaned senior staff

Scale

Engagements for companies from $45 million to more than $90 billion in annual revenue; return volumes up to 495+ state returns in a season; teams of up to 19 professionals across US and offshore locations.

Education, credentials and tools

- **Certified Public Accountant (CPA)**, State of Florida, active license — verifiable on the Florida DBPR license portal, myfloridalicense.com

- **Master of Business Administration (MBA)**, Accounting and Business Management, University of South Florida St. Petersburg, December 2015 — summa cum laude; 4.0 GPA; Beta Gamma Sigma; Beta Alpha Psi
- **Bachelor of Arts (BA)**, Business Management and Accounting, University of South Florida St. Petersburg
- **Tax software:** Thomson Reuters ONESOURCE Income Tax; GoSystem Tax RS; advanced Microsoft Excel modeling
- **AI:** frontier AI models; AI agents for model building, tie-outs, reconciliations and memo drafting; custom AI skills for recurring tax workflows (every output reviewed and tied out)
- **ERP and accounting systems:** NetSuite; Sage
- **Consolidation and reporting systems:** OneStream (tax forms, XFGetCell data pulls); Oracle Hyperion Financial Management (HFM) via Smart View; QlikView
- **Languages:** English (native); Spanish (professional working proficiency)
- **Community:** Board Member, Suncoast Housing Connections, a Tampa Bay affordable-housing nonprofit, January 2023 to present
- **Volunteer:** IRS VITA/TCE certified tax preparer

Availability, location and contact

Target roles	Senior Tax Manager · Tax Director · VP of Tax (Vice President of Tax) · Head of Tax · Regional Tax Director (APAC) · Income Tax Provision Manager (ASC 740) · International Tax Manager
Current status	Engaged on a special-projects contract through November 2026, with limited capacity for part-time or advisory work before then.
Next full availability	December 2026 for part-time or full-time contract engagements, or a full-time role. If you are planning coverage for the Q1 2027 provision cycle, a transaction close, or an open Senior Manager or Director seat, reach out now to lock in scope and timing.
Location	St. Petersburg, Florida (Tampa Bay). Remote anywhere in the United States; on-site available; open to relocation across Asia-Pacific hubs — Singapore, Kuala Lumpur, Penang, Petaling Jaya, Bangkok, Jakarta, Bali and Hong Kong — for the right role.
Contact	Direct Contact form · linkedin.com/in/bibisipra · bibisipra.com