

## **TRANSCRIPT Episode 23 – Michael Criddle**

**Jonathan Bench:** Today I'm joined by Michael Criddle, a CPA with the firm Eide Bailly based in Salt Lake City, Utah. Mike is a leader in Eide Bailly's international tax services group. He advises U.S. companies expanding abroad and non-U.S. companies with their U.S.-facing work. Mike has experience with foreign investment as well as employment issues businesses often face when sending employees abroad. He's also a close personal friend and an often-used partner for my clients. Mike, thank you for coming to the podcast today.

**Michael Criddle:** I'm very excited to be here, Jonathan. Thanks for having me.

**Jonathan:** Let's dive into your personal and professional background. You've been a CPA for a long time, and I think international has been your whole career. I'd love to hear how you got into this path and what you've learned along the way—especially your love for the international space.

**Michael:** It's interesting—probably not many people decide what they want to do in life when they're 12. But I remember looking at my uncle, who was a tax accountant, and my father, who was going to school to get a PhD in biophysics. I told my dad, "When I grow up, I'm going to be like my uncle Dale and not like you," because I didn't want to go to school for 13 years after high school. That's always been a standing joke in our family, but it stuck.

I decided at 12 that I wanted to be a tax accountant. By the time I got into high school, I was fully behind that idea. I took concurrent enrollment classes at Salt Lake Community College in accounting and finance, so when I graduated high school, I had already completed a year of college. That allowed me to finish both a bachelor's and a master's degree in four years at the University of Utah.

I also had an incredible opportunity to do a service mission overseas, which really sparked my love of all things international. I learned Spanish, which has helped me tremendously in working with clients from Spanish-speaking countries. After graduating, I started with a Big Four accounting firm in their international tax group. So from the very beginning, I've had the opportunity to work in international tax. Candidly, I've just been fascinated by the diversity and complexity of international tax issues, and I feel that breadth of experience drives a lot of value for clients operating in the cross-border space.

**Jonathan:** How rare is it to be an international accountant? Is it mostly a coastal thing? Are there a lot of you, or are you a bit of a unicorn? In the legal space, there aren't many true international lawyers in the U.S. A lot of us deal with inbound clients, but taking clients outbound is where things get extremely complex. Is it similar in your realm?

**Michael:** There are probably a fair number of accountants who dabble in international tax issues. Maybe they have a client setting up a subsidiary, or they come across an employee going overseas for a year or two. But for someone who does the vast majority of their work in the international cross-border space, there are very few of us.

Generally, people with my level of experience tend to be on the coasts—New York, California—where there are more multinational companies to support a predominantly international practice. I’ve been fortunate that over the past 25 years, as tax services have evolved, it’s become much easier to service clients around the world from a base in Utah. With Teams, the internet, and seamless information transfer across borders, practicing in this space remotely is more viable than ever.

**Jonathan:** You do travel quite a bit, though. What do you gain from international travel that you wouldn’t gain if you just stayed home behind your screen?

**Michael:** Interacting with people is a huge part of it. Going to other countries, meeting people, understanding their culture, how they do business, and what they value—those experiences are invaluable. When you immerse yourself in a foreign jurisdiction, you gain insight into what really drives business there and how to help clients navigate it.

Having visited over 40 countries, I can say with confidence whether a country is pro-business or whether it’s challenging to get traction there, because I’ve experienced it firsthand. That kind of understanding goes beyond what you can read in a report.

**Jonathan:** Talk about the interplay of tax and legal. We talk weekly, sometimes daily, about clients and their decisions. Often it comes down to, “If legal is okay with it, tax can do it,” and legal says, “If tax says it’s efficient, we’re fine.” From your perspective, how does that collaboration work?

**Michael:** Tax is driven by law—U.S. tax law and the laws of other jurisdictions. But as we’ve discussed many times, there’s a lot of gray between the black and white of the statutes. What does this provision mean? How should it be interpreted? How does it apply in this context?

That gray area creates opportunities for collaboration. An experienced tax advisor and an attorney who understands the space can work together to navigate that gray. We ask: What are the ultimate goals? What are we trying to accomplish? How do we stay within legal boundaries while achieving the best results for the client? That partnership is critical.

**Jonathan:** What big things are happening in tax right now that businesspeople—and lawyers like me—should know?

**Michael:** Over the last 10 to 15 years, there's been an acceleration in tax law changes. After the major overhaul in 1986, the code was relatively stable for a while. But now there's a push toward temporary provisions with sunset clauses. Lawmakers try to achieve certain goals while limiting the long-term economic impact of a bill, so we see provisions that last three years, five years, or phase down over time.

For example, bonus depreciation went from 100% to 80%, then 60%. Section 174 required companies to capitalize and amortize research and development expenses instead of deducting them immediately. That change didn't take effect when the 2017 law was signed—it kicked in five years later, in 2022. For startups with little income and heavy R&D costs, that had a profound impact. The result is increasing complexity. Even without new legislation, previously enacted provisions can dramatically change outcomes years later.

**Jonathan:** Is tax legislation usually standalone, or is it tacked onto omnibus bills?

**Michael:** Historically, it's often been standalone. But in recent years, with increased political acrimony and difficulty reaching compromise, tax legislation is more often passed through omnibus bills using procedures that allow a simple majority in the Senate.

**Jonathan:** How has the shifting global trade order—tariffs, WTO issues, bilateral agreements—affected your world?

**Michael:** It's become increasingly complex. Tariffs are a significant factor. Bilateral double tax treaties between the U.S. and other countries matter a great deal. The U.S. has been reluctant to adopt certain OECD guidance and often seeks carve-outs.

That means more due diligence in every cross-border transaction. You can't simply rely on long-standing frameworks and assume they'll apply as before. The U.S., as a major trade partner, sometimes dictates terms outside the traditional WTO or OECD model. That unpredictability increases the need for careful planning.

**Jonathan:** If you had a heat map of where business is heating up, what would it show?

**Michael:** While people still talk about China and nearby countries like Vietnam, Cambodia, Japan, and Korea, I'm seeing significant activity in former British Commonwealth countries—UK, Australia, Canada, and India—as well as Ireland and, of course, the United States.

Nearshoring is big. Companies are moving manufacturing to the U.S., Mexico, and parts of Central and South America. I'm seeing more interest in those regions than in the Far East right now. In just the past couple of months, I've had three conversations with Asia-Pacific companies looking to establish U.S. manufacturing subsidiaries. That's precisely the kind

of shift U.S. policy has tried to incentivize. Whatever one thinks of tariffs or recent tax changes, you can't deny they've influenced behavior.

**Jonathan:** Let's talk about your role with startups versus companies that have a CFO. What does that interplay look like?

**Michael:** Regardless of sophistication, most companies don't prepare their own tax returns. Even the largest companies hire Big Four firms for that. But for newer companies entering the U.S., we often provide broader services—outsourced accounting, outsourced CFO services, payroll, financial modeling, and strategic planning. We help them comply with U.S. filing obligations and generate financial statements for their parent companies.

For more established companies, we provide deeper core services—tax provisions for audits, deferred tax asset and liability analysis, and complex international tax adjustments like GILTI, which is now referred to as net tested income. So newer companies get more varied support; established ones get more specialized depth.

**Jonathan:** How is AI changing your job?

**Michael:** Some clients now ask AI their tax questions first and then come to me for confirmation. For straightforward questions—like when bonus depreciation phases down—AI can do a great job. I may get fewer 15-minute phone calls about basic rules.

But what AI can't yet replicate is experience. It can tell you about Section 1202, but it can't share the lived experience of hundreds of companies that have navigated it. The real value now is at the trusted advisor level—helping clients apply rules strategically, avoid pitfalls, and align tax planning with broader goals. AI can explain the rules; we help navigate them.

**Jonathan:** How is AI changing how younger CPAs develop?

**Michael:** Traditionally, CPAs progressed step by step—organizing work papers, inputting data, checking accuracy, and gradually building toward more complex analysis. AI will handle many of those early steps. That means younger CPAs will need to grow up faster. They'll have to move quickly from understanding basic accounting principles to consulting on complex tax issues.

Instead of spending years climbing the ladder of technical tasks, they'll need to evaluate outputs, identify errors, and engage in higher-level client discussions much earlier in their careers.

**Jonathan:** One final question. If you weren't in tax season—or if you weren't a CPA at all—what would you be doing?

**Michael:** I keep a list of places in the world I want to see. I've been to 40 countries, and I've told my wife that by the time I'm 60, I want to have visited 60. Travel brings a lot of enjoyment and happiness into my life. If money weren't an issue, I'd spend more time exploring those places.

Australia and New Zealand are high on the list—though I'd probably visit in November or December instead of March.

**Jonathan:** Excellent. Mike, this has been so fun. Thank you for your time, your insights, and your partnership. I appreciate being one of the few people who can still make one of those 15-minute calls and have you return it.

**Michael:** Thanks again, Jonathan. I really appreciate it.