

Tax strategies are becoming increasingly complex and more highly scrutinized by regulatory authorities worldwide. Duff & Phelps specializes in tax valuation and related consulting when tax laws and regulations stipulate that a valuation is required or when assistance is needed to implement tax strategies.

Duff & Phelps professionals have extensive testifying experience and are skilled at forming strategy and defending valuation positions. We have advised staff members of the U.S. Finance Committee, the House Ways and Means Committee, and the Joint Committee on Taxation on valuation and tax legislation matters. Duff & Phelps professionals have the requisite knowledge and expertise for today's changing tax and regulatory landscape.



## TAX SERVICES

Duff & Phelps provides tax valuation and consulting services for a variety of transaction-related, compliance, planning and dispute purposes.

### Tax Valuations

- Legal Entity Valuation
- Taxable Reorganizations
- Asset Valuations (IRC §338/§1060)
- Estate and Gift Taxes
- Cost Segregation (IRC §1245/§1250)
- Fair Market Value Interest Expense Allocation Valuations (IRC §864[e] and Treasury Regs. §861-8)
- Non-Compete Agreements (IRC §280[g])
- C Corp. to S Corp. Conversions (IRC §1374)
- Net Operating Loss (NOL) Limitations and Built-In Gains (IRC §382)
- Like-Kind Exchanges (IRC §1031)
- Worthless Stock Deductions (IRC §165)
- Outbound Transfers of Appreciated Property (IRC §367)
- Valuations of Partnerships & Other Pass-Through Entities

### Transfer Pricing

The scope of our expertise allows us to provide clients with advice that ranges from implementation of transfer pricing policies and procedures that satisfy financial reporting and tax compliance requirements to risk management.

#### *Our transfer pricing services include:*

- Planning and analysis related to intangible property, including cost sharing and licensing of patents, trademarks, trade names and other intangibles
- Creating optimal tax structures through operational planning, including the realignment of manufacturing, sourcing, distribution and other service operations
- Negotiating Advance Pricing Agreements to mitigate risks by agreeing in advance to transfer pricing policy terms with one or multiple tax authorities
- Providing dispute resolution for transfer pricing tax audits in the United States and in foreign jurisdictions and litigation support related to transfer pricing cases
- Creating financial models that support operational efforts to monitor transfer pricing compliance and assist in the preparation of documentation for Sarbanes-Oxley internal control reviews
- Performing transfer pricing due diligence for mergers and acquisitions
- Recommending post-merger transfer pricing integration plans, including the consolidation of intellectual property ownership
- Preparing transfer pricing documentation to support global compliance requirements

### Property Tax Services

Duff & Phelps assists clients in identifying tax saving opportunities by reviewing their tangible property portfolio and associated property tax assessments and liabilities. We perform complete property tax services, including valuation analysis and protest, personal property compliance, tax bill processing and tax bill payment. We specialize in complex properties that are typically found in the chemical, energy/utility, technology, manufacturing, telecommunications and transportation industries. Additionally, Duff & Phelps has expertise in a wide range of commercial and industrial properties such as corporate office headquarters, multi-tenant office buildings, regional shopping centers, industrial warehouses, manufacturing plants and hotel/casino properties.

#### Property tax services include:

- Valuation appeals
- Exemptions
- Litigation support/property tax appeals
- Pre-/Post-acquisition due diligence
- Compliance
- Tax appraisals for property tax negotiations

### Business Incentives Advisory

The Duff & Phelps business incentives advisory practice is focused on assisting companies in capturing the following types of economic development incentives:

- Real and personal property tax exemptions
- Investment tax and research & development credits (ITCs and R&D credits)
- Project grants (cash, land, infrastructure and real property grants)
- Location-specific benefits such as State Enterprise Zones and Federal Empowerment Zones
- Reduced cost and tax increment financing
- Utility discounts
- Sales and use tax exemptions
- Relocation cost subsidies
- Wage subsidies
- Hiring from targeted populations
- Recruitment and training assistance

### Unclaimed Property and Tax Risk Advisory

Our professionals combine their extensive experience and technical resources to help our clients manage their unclaimed property responsibilities. This includes performance of the following services to help ensure clients are neither over or under reporting unclaimed property:

- Audit readiness review
- Audit representation and negotiation
- Transactional planning and M&A assistance
- Risk reduction through voluntary disclosure applications
- Refund recovery of over remittances
- Process and procedure reviews
- Co/Outsourcing of entire compliance process
- Pre filing reviews
- Financial reporting and GAAP review, analysis and quantification

In the tax risk advisory area we assist clients in the identification, measurement, documentation and quantification of income tax liabilities in accordance with FAS 109 and FIN 48.

### About Duff & Phelps

Duff & Phelps Corporation (NYSE: DUF) is a leading provider of independent financial advisory and investment banking services, supporting client needs principally in the areas of valuation, transactions, financial restructurings and disputes. Founded in 1932, our mission is to protect, recover and maximize value for our clients, by providing objective advice on issues related to highly technical and complex assessments of value. Our services include financial reporting valuation, tax services, real estate services, corporate finance consulting, merger and acquisition advisory, fairness and solvency opinions, restructuring advisory, and dispute and legal management consulting. Investment banking services are provided by Duff & Phelps Securities, LLC.

Our professionals bring practical experience, responsiveness and a collaborative approach to satisfy our clients' needs with the rigor and independence that the market demands. When our clients can't afford to get their analysis wrong, they look to Duff & Phelps to get it right.

With over 1,000 employees serving clients worldwide through offices in the United States, Europe and Asia, Duff & Phelps is committed to delivering insightful advice and service of exceptional quality, integrity and objectivity.

**For further information regarding our services, please contact us at +1-866-282-8258. You may also visit our Web site at [www.duffandphelps.com](http://www.duffandphelps.com).**