

Subject Index

Note: Page numbers in *italics* and **bold** refers to figures and tables and “n” indicates notes.

A

ABV. *see* Accredited in Business Valuation (ABV)
accounting
 for adjustments, 74
 for taxes, 94
Accounting Standards Codification (ASC), 16, 349
Accounting Standards Updates (ASUs), 365
accounts payable (A/P), 251
accounts receivable (A/R), 251
Accredited in Business Appraisal Review (ABAR), 23
Accredited in Business Valuation (ABV), 24
accredited member (AM), 24
accredited senior appraiser (ASA), 24
accretion/dilution analysis, 348
Estate of Adams v. Commissioner, 127, 128
Adams v. United States, 314
adjusted net assets (ANA) method, 106, 188–191, 189
advocate, 22
after-tax cost of capital, 169
agency costs, 44n1
 and control concepts, 86
Abmanson Foundation v. US, 320
AICPA. *see* American Institute of Certified Public Accountants (AICPA)
allowances for doubtful accounts, 91
alternatives principle, 10
AM. *see* accredited member (AM)
American Institute of Certified Public Accountants (AICPA), 16–17, 24, 340
American National Accreditation Board (ANAB), 23
American National Standards Institute (ANSI), 23
American Society of Appraisers (ASA), 24, 340
American Stock Exchange (ASE), 262
ANAB. *see* American National Accreditation Board (ANAB)
Estate of Andrews, 297, 299
anomalies consideration in historical information, 121–122
ANSI. *see* American National Standards Institute (ANSI)
Appeals and Revenue Memorandum (ARM), 8, 25, 34, 218
appendices, use of, 394–395
appraisal, 9, 186
appraisal review and management (ARM), 24
APT. *see* arbitrage pricing theory (APT)
arbitrage pricing theory (APT), 179–180
arithmetic mean, 272–273

ARM. *see* Appeals and Revenue Memorandum (ARM); appraisal review and management (ARM)
ASA. *see* accredited senior appraiser (ASA); American Society of Appraisers (ASA)
ASC. *see* Accounting Standards Codification (ASC)
ASE. *see* American Stock Exchange (ASE)
asset approach, 75, 106, 183–184, 187
 ANA method, 188–191, 189
 book value, 187
 going concern and liquidation assumptions, 185
 limitations and applicability, 192–194
 sources of data used to estimate net asset value, 185–187
 theory, 184–185
assumptions and limiting conditions, 22
ASUs. *see* Accounting Standards Updates (ASUs)

B

Estate of Bailey v. Commissioner, 296
balance sheet, 50, 122
 common methods-based economic normalizing adjustments, 91–93
Baltrusis v. Baltrusis, 314
Bank of America, N.A. v. Veluchamy, 128
bankruptcy, 14
Barnes v. Commissioner, 320
benchmark capital structures, 114–115
benchmarking, 44–45
 normalizing financial statements for, 77
 normalizing historical financial statements for, 74
 studies, 186
benefit stream, 72, 159
 capitalized cash flow, 120–122
 consideration of economic and industry benchmarking, 119
 discounted cash flow, 122–123
 economic benefit streams, types of, 115–119
 equity *vs.* invested capital economic benefit stream, 113–115
 forecasts and projections, 111–113
 growth assumptions, 123–127
 short-term *vs.* long-term considerations, 120
 tax-affecting pass-through entities, 127–134
Bernier v. Bernier, 127
best-fit benchmarking in GPCM, 233, 234–235

- beta (β), 155–156, 162
 calculation, 156
- BIG. *see* built-in gain (BIG)
- BIZCOMPS, 257–259, 257–258, 259
- BizMiner, 63
- BizStats, 63
- black/green build-up summation model, 179
- blockage/market absorption discount, 317
- BLS. *see* Bureau of Labor Statistics (BLS)
- Estate of Bonner*, 296
- book value, 187
- BPM. *see* Butler Pinkerton Model (BPM)
- Estate of Bright*, 294
- broad factors analysis, 38
- Buckelew Farm, LLC v. Commissioner*, 28n23
- build-up model (BUM), 87, 163–166, 164–166
 build-up summation table, 176, 177–178
- built-in gain (BIG), 12
- BUM. *see* build-up model (BUM)
- Bureau of Labor Statistics (BLS), 47
- business, defined, 366
- business combinations, 16
- business life cycle, 46
 seven-stage model of, 105
 stages of, 46, 46
- Business Valuation Resources (BVR), 252
 Contributor Network, 254
 control premium studies, 288–289
 Guideline Public Company Comps Tool, 269
- business valuation review standards, 338
- Butler Pinkerton Model (BPM), 181
- buy-sell agreements, 15–16, 318
 aligning valuation with, 16
- C**
- CAGR. *see* compound annual growth rate (CAGR)
- calculation engagement level of analysis, 390
- calculation report, 389–390
- Canadian System for Electronic Document Analysis and Retrieval (SEDAR), 254
- capital asset pricing model (CAPM), 160–163, 174–181
- Capital IQ, 267
- capitalization process
 impact of various growth rates on, 224–228, 224–227
- capitalization rate, 147–148, 199, 224
 criteria, 147
 terminal value, 149
- capitalized cash flow (CCF) method, 84, 120, 197, 199, 203, 334
 appropriate look-back period, selection of, 120–121
 assumptions used in, 203–204
 consideration of anomalies in historical information, 121–122
 examples using, 203
 using net cash flow to equity, 204, 204
 using net cash flow to invested capital, 204, 204
 selecting type of benefits as measurement of economic income, 122
 unweighted average method, 121
 weighted average method, 121
- capitalized excess earnings method, 220
 description of, 220
 example, 220–221, 220, 221
- capitalizing *vs.* expensing policies, 93
- CAPM. *see* capital asset pricing model (CAPM)
- cash burn rate, 60–61
- cash conversion cycle, 55
- cash flow, 116, 169, 169
 analysis, 51
 to equity, 116
 to invested capital, 116
 treatment of interest expense in cash flow calculations, 114, 114
- cash ratio, 54
- cash runway, 61
- CBA. *see* Certified Business Appraiser (CBA)
- CBOT. *see* Chicago Board of Trade (CBOT)
- CBV Institute. *see* Chartered Business Valuators Institute (CBV Institute)
- Estate of Cecil v. Commissioner*, 128
- CEFs. *see* closed-end funds (CEFs)
- Center for Research in Security Prices (CRSP), 151–152
- Central Trust Co. v. United States*, 297
- Certified Business Appraiser (CBA), 23
- Certified Business Intermediary (CBI) certification, 254
- Certified in Financial Forensics (CFF), 24
- Certified Valuation Analyst (CVA), 23
- CFF. *see* Certified in Financial Forensics (CFF)
- Chartered Business Valuators Institute (CBV Institute), 25, 341
- Chicago Board of Trade (CBOT), 262
- Estate of Cidulka v. Commissioner*, 296
- closed-end funds (CEFs), 290
- CM ratio. *see* contribution margin ratio (CM ratio)
- coefficient of variation, 280
 of operating income (EBIT), 61
 of sales volatility, 61–62
- Columbia Financial Advisors, Inc. Studies (2000), 306
- common methods-based economic normalizing adjustments
 balance sheet, 91–93
 income statements, 93–96
- common-size analysis, 51
- common-sizing balance sheets and income statements, 51
- company research, 34–35
- company-specific risk premium (CSRP), 156–158
 adjustment for other risk factors, 158–159
 adjustments for differences in risk, 158
 adjustments for risk in net cash flows and biased forecasts, 158

- Comparable Analyzer, 251–252
comparable public company analysis, 347
comparables, 186
compensation of owners and managers, 94–95
completed transaction analysis, 347
completed transaction method (CTM), 17, 228, 232, 233, 235
 advantages of, 261–262
 appropriate multiples for valuing small and large companies, 245–246
 basic implementation of, 238–245
 BIZCOMPS, 257–259, 257–258, 259
 concepts in application of, 247–248
 control issues, perspectives on lack of, 246
 correlation to other value indications, 248
 databases, common multiples found in, 237
 data sources, 250
 DealStats, 252–256, 252, 253–254, 256
 disadvantages of, 262
 marketability and liquidity issues, perspectives on lack of, 246–247
 principles to select comparative data, 236
 sample size concepts for all databases, 248–249
 selection criteria considerations for all databases, 249
 total market analysis in, 233–234, 233
 value produced by, 236–237
 ValuSource M&A Comps, 259–261, 260
 ValuSource Market Comps, 250–252, 250
complex capital structures, 355
 convertible securities, 360–361
 debt securities, 358–360
 employee stock options, 356
 practical valuation approaches, 361
 preferred stock valuation, 357
compound annual growth rate (CAGR), 275
contemporaneous writing, 402
contingent liabilities, 95–96
continuing professional education (CPE), 23
contribution margin ratio (CM ratio), 57
control
 development of adjustments for control or lack of, 286–288
 and IRS, 287
 perquisites applicable to majority ownership, 287–288
 sources of empirical data on control interests, 288–290
controlling interest, 105, 299–300
control premium, 287, 288, 295, 348
convertible securities, 360–361
core valuation approaches, 347
cost of capital, 143, 146
 with appropriate benefit stream, 115
 BUM, 163–166, 164–166
 CAPM, 160–163
 considerations in normalization process, 87
 consistency, 146–147
 discount rates and capitalization rates, 147–149
 double-counting risk factors, 172
 examples of the effect of normalization on, 88–89
 growth rates, 169–172
 historical annual returns of different US investments, 144–145
 historical growth of stocks, bonds, bills, and inflation, 143
 key variables in estimating, 151–159
 to match different benefit streams, 169
 matching benefit streams to appropriate discount or capitalization rate, 172, 172
 models, 159–160
 risk adjusted factors, 149–151
 WACC, 166–168, 168
cost of preferred stock formula, 357
cost of replacement method (CRM), 372
cost of sales ratio (%), 56
cost structure, 58
cost synergies, 348
CPE. *see* continuing professional education (CPE)
credit risk, 359
critically evaluating normalization adjustments, 89
 examples of judgment impact on, 89–90
 financial statement trend analysis and benchmarking, 90–91
CRM. *see* Cost of Replacement Method (CRM)
cross-purchase agreements, 15
CRSP. *see* Center for Research in Security Prices (CRSP)
Crutwell v. Lye, 353n3
CSRP. *see* company-specific risk premium (CSRP)
CTM. *see* completed transaction method (CTM)
current ratio, 54
current valuations, 45
CVA. *see* Certified Valuation Analyst (CVA)
- D**
Dallas v. Commissioner, 127, 128
Daubert v. Merrell Dow Pharmaceuticals, Inc., 8n1, 339n9
Estate of Davis v. Commissioner, 314
DealStats (database), 231, 252–256, 252, 253–254, 256
deal value, 349
debt securities, 358–360
debt service, treatment of, 114
defensive interval period (DIP). *see* defensive interval ratio (DIR)
defensive interval ratio (DIR), 60
defined benefit pension plans, 373
degree of operating leverage (DOL), 58
Delaware MRI model, 131, 131
Delaware Open MRI Radiology Associates, P.A. v. Kessler, 127, 128, 131, 157
depreciation methods, 92–93
Estate of Desmond v. Commissioner, 314
detailed report, 388
dilution analysis, 348

- DIR. *see* defensive interval ratio (DIR)
- direct market data method (DMDM), 252
- direct valuation of equity, 115
- disclaimers, 395
- discount for lack of control (DLOC), 285, 316, 349
- discount for lack of liquidity (DLLOL), 246, 286, 300
 estimating, 301
 key considerations in estimating, 300–301
- discount for lack of marketability (DLOM), 246, 285, 316, 349
 factors influencing, 300
 IRS view on, 297–298
 judicial developments and, 314
- Discount for Lack of Marketability: Job Aid for IRS Valuation Professionals, 297
- discount rate, 147–148, 159
 criteria, 147
 terminal value, 149
- discounted cash flow (DCF) method, 17, 84, 116, 122, 197, 205, 334, 347
 economic income, 122
 examples using a two-stage discounted cash flow method, 206
 forecasted cash flow, 122–123
 forecasted earnings or net income, 123
 forecasts in constant real dollars *vs.* nominal dollars, 123
 forecasts or projections, 123
- discounts, 316
 blockage/market absorption discount, 317
 critical considerations, 321
 discount for lack of control (DLOC), 285, 316, 349
 discount for lack of liquidity (DLLOL), 246, 286, 300–301
 discount for lack of marketability (DLOM), 246, 285, 297–298, 300, 314, 316, 349
 investment company discount, 319
 key person discount, 318
 lack of voting rights discount, 319–320
 restrictive agreement discount, 318
- discretionary earnings, 245
- discretionary spending or perks, 87
- dividend-paying capacity, 330–331
- dividend per share (DPS), 357
- divorce/marital dissolution, 13
- divorce valuations, determining appropriate standard of value in, 17
- DLOC. *see* discount for lack of control (DLOC)
- DLLOL. *see* discount for lack of liquidity (DLLOL)
- DLOM. *see* discount for lack of marketability (DLOM)
- DMDM. *see* direct market data method (DMDM)
- documentation of normalization adjustments, 90
- DOL. *see* degree of operating leverage (DOL); US Department of Labor (DOL)
- double-counting risk factors, 172
- Estate of Dougherty v. Commissioner*, 319
- DPS. *see* dividend per share (DPS)
- Estate of Dunn v. Commissioner*, 190n6
- DuPont analysis, 59–60
- ## E
- earnings, 118–119
 major mathematical types of earnings growth, 124–125
 measures with discount and capitalization rates, 119
- earnings before interest and taxes (EBIT), 58, 213, 233
- earnings before interest, taxes, depreciation, and amortization (EBITDA), 11, 63, 213, 228, 246, 308, 329
- earnings per share (EPS), 348
- EBIT. *see* earnings before interest and taxes (EBIT)
- EBITDA. *see* earnings before interest, taxes, depreciation, and amortization (EBITDA)
- economic analysis, 36
- economic benchmarking, 119
- economic benefit streams, types of, 115–119
- economic damages, 14
- economic income, 198
 selecting type of benefits as measurement of, 122
 type of benefits as measurement of, 202
- economic information, 35
- economic instability, 11
- economic normalization for methods application, 75
- economic reality, 70
- EDGAR. *see* Electronic Data Gathering, Analysis, and Retrieval (EDGAR)
- EEMs. *see* excess earnings methods (EEMs)
- effective report writing, 396–401
- Electronic Data Gathering, Analysis, and Retrieval (EDGAR) system, 254, 269
- Emory Studies, 309
- empirical data
 closed-end funds, 290, 291
 FactSet/BVR control premium studies, 288–289
 Houlihan Lokey, Inc, 290
 Morningstar Principia, 290
 partnership profiles, 289–290
 pre-initial public offering (pre-IPO) studies, 309–312
 restricted stock studies, 302–305
 SEC studies, 289
 sources on control/noncontrolling interests, 288
 supporting DLOMs, 301
- Employee Retirement Income Security Act of 1974 (ERISA), 16, 363
- employee stock options (ESOs), 356
- employee stock ownership plan (ESOP), 12, 16, 363
 role of analyst in, 364
 special considerations in, 364
- end-of-period, 210–212, 212
 discounting conventions, 211–212
 net present value formula, 210
 present value factor formula, 211

- engagement acceptance and planning
 - addressing conflicts of interest in valuation engagements, 378
 - assumptions, limiting conditions, and scope limitations, 381
 - and checklists, 377
 - clients, 379
 - effective research, 382–383
 - engagement letters, 381–382
 - interest to be valued, 380
 - premise of value, 381
 - qualifications, 379
 - referral sources, 379
 - retainers, 382
 - standards of value, 380–381, 381
 - subject to be valued, 380
 - valuation date, 380
 - valuation engagement acceptance, 377
 - valuation, purpose and use of, 380
 - engagement letters, 381–382
 - enterprise goodwill, 217, 353
 - enterprise value (EV), 231–232, 232
 - entity-level discounts and adjustments, 286
 - EPS. *see* earnings per share (EPS)
 - equitable distribution, 352–353
 - equity
 - interests as investments, 10
 - invested capital economic benefit stream *vs.*, 113–115
 - measures of earnings, 118
 - equity risk premium (ERP), 151–154
 - “equity value,” 356
 - ERISA. *see* Employee Retirement Income Security Act of 1974 (ERISA)
 - ERP. *see* equity risk premium (ERP)
 - ESOP. *see* employee stock ownership plan (ESOP)
 - ESOs. *see* employee stock options (ESOs)
 - ethical standards, 30
 - ethics FAQ library, 340
 - EV. *See* enterprise value (EV)
 - excess earnings methods (EEMs), 217–218
 - advantages and disadvantages of, 221–222
 - excess earnings treasury method, 218
 - description of, 219
 - example, 219, 219
 - excess employees or payroll, 87
 - excess or below-market officer/owner compensation, 86
 - exchange value, 14
 - exhibits, use of, 394–395
 - existing capital structures, 114–115
 - exit multiple
 - examples, 214
 - as terminal value, 213–214
 - expense management, 51
 - extraordinary or nonrecurring items, 94
- F**
- FactSet Review, 288–289
 - issues related to, 292–293
 - FactSet/BVR control premium studies, 288–289
 - fair market value (FMV), 13, 17–18
 - fairness opinions, 17
 - fair value, 352, 359, 369
 - for financial reporting, 16–19
 - hierarchy, 369
 - under state statute, 18–19
 - Fair Value Measurements* (FASB exposure draft), 18
 - Fama-French three-factor model, 180
 - family transfers, 293–294
 - FASB. *see* Financial Accounting Standards Board (FASB)
 - Federal Rules of Civil Procedure (FRCP) 26(A)(2)(B), 354–355
 - Federal Rules of Civil Procedure (FRCP) 26, 392
 - Federal Rules of Evidence (FRE), 8n1, 353, 392
 - Ferraro v. Ferraro*, 296
 - FF&E. *see* furniture, fixtures, and equipment (FF&E)
 - Financial Accounting Standards Board (FASB), 16, 18, 29, 349
 - financial analysis normalization, 48
 - financial data, 112, 255
 - financial forecast, 112
 - financial projection, 112
 - financial ratio analysis, 52–53
 - financial reporting, 364
 - ASC 350, *Intangibles–Goodwill and Other*, 366–367
 - ASC 805, *Business Combinations*, 365–366
 - ASC 820, *Fair Value Measurement*, 368–369
 - GAAP framework and codification, 365
 - GAAP-required valuations, 365
 - impairment testing process, 367
 - simplified model, 367–368
 - financial risk (leverage) ratios, 58–59
 - financial statements, 185
 - analysis normalization, 75
 - financial ratio analysis, 52–53
 - future performance, 53–54
 - historical financial data, identifying key trends in, 50–51
 - historical performance, 53
 - limitations, 51–52
 - and ratio analysis, 44
 - techniques, 51
 - and trend analysis, 50
 - financial synergies, 348
 - financial tests, 59–62
 - financing cash flow, 51
 - First Research, 64
 - Five Forces Analysis (Porter), 37, 37
 - fixed asset registers, 186
 - fixed asset values to reflect appreciation or impairment, 93
 - FMV. *see* fair market value (FMV)
 - FMV Opinions (2001), 304–305

Estate of Folks v. Commissioner, 319
 forced liquidation, 20, 185
 forecasted cash flow, 122–123
 forecasted earnings or net income, 123
 forecasting process, consideration of other evidence in, 66
 forecasts, 111–113, 123
 formula approach, 218
 foundational considerations, 21–22
 Fourteen Packages of Pins case, 17
 FRE. *see* Federal Rules of Evidence (FRE)
 freewriting, 402
 frequency of forecasts *vs.* projections, 113
 fundamental valuation approach, 358
Furman v. Commissioner, 318
 furniture, fixtures, and equipment (FF&E), 251
 future valuations, 45

G

GAAP. *see* generally accepted accounting principles (GAAP)
 GACVA. *see* Global Association of Certified Valuators and Analysts (GACVA)
Gallagher v. Commissioner, 127
 GDP. *see* gross domestic product (GDP)
 Gelman Study (1972), 303
 general and ethical standards, 338
 generally accepted accounting principles (GAAP), 29, 185, 219, 364, 370–371
 accounting, 70
 framework and codification, 365
 GAAP-required valuations, 365
 net income, 118
 geometric mean, 275–276
Giustina v. Commissioner, 127
 Global Association of Certified Valuators and Analysts (GACVA), 23–24, 341
 Global Industry Classification Standard (GICS) code, 236
 goal seek function, 167
Estate of Godley v. Commissioner, 296
 going concern value, 20
 goodwill, 366
 hybrid models for valuing, 217–218
 strategic uses of EEMs for identifying, 217–218
 Gordon growth model, 198–199
Gottsacker, In re Marriage of, 314
 government, legal, and regulatory filings, 187
Gow v. Commissioner, 296
 GPCM. *see* guideline public company method (GPCM)
 gross domestic product (GDP), 333
 gross margin (%), 56
Gross v. Commissioner, 127, 128–129, 314
 growth analysis. *see* horizontal analysis
 growth assumptions, 123
 evaluating quality and quantity of company historical data, 125–126
 historical growth trends, 126–127
 growth rates, 169–172

guideline public company method (GPCM), 17, 62, 228, 233, 262, 263, 330
 advantages of, 270
 basic implementation of, 266–268
 benefits and limitations, 263–264, 264
 best-fit benchmarking in, 233–235, 233
 BVR's Guideline Public Company Comps Tool, 269
 capital structure considerations in, 266
 consistency in application of, 268
 data sources, 268
 disadvantages of, 271
 Electronic Data Gathering, Analysis, and Retrieval (EDGAR), 269
 interpreting level of value in, 265, 265
 principles behind multiple, 264
 S&P Capital IQ, 269
 selecting an appropriate GPCM multiple, 264–265
 TagniFi, 269

H

Hall and Polacek Study (1994), 304
Estate of Joyce C. Hall, 268, 320
 harmonic mean, 276–277
Estate of Heck v. Commissioner, 127, 128, 296
 Hertz/Smith Study (1993), 305
 historical economic income, 112
 historical ERPs, 152
 historical financial data, identifying key trends in, 50–51
 historical financial statements, 122
 historical growth trends, 126–127
 historical valuations, 45
 Hitchner study no. 1, 310
 Hitchner study no. 2, 311
 H-model as terminal value, 214–216
HMO-W v. SSM Health Care System, 296
Estate of Hoffman v. Commissioner, 314
 horizontal analysis, 51
 Houlihan Lokey, Inc, 290
 hurdle rate, 15n8
 hybrid models
 strategic uses of EEMs, 217–218
 for valuing intangibles and goodwill, 217
 hypothetical willing buyer and willing seller test, 330

I

IASB. *see* International Accounting Standards Board (IASB)
 IBA. *see* Institute of Business Appraisers (IBA)
 IBBA. *see* International Business Brokers Association (IBBA)
 ICE. *see* Institute for Credentialing Excellence (ICE)
 IFRS. *see* International Financial Reporting Standards (IFRS)
 impairment testing process, 367
 implied private company pricing line (IPCPL), 181
 incentive stock options (ISOs), 356
 income approach and methods, 107, 212
 advantages, 212–213
 benefit streams, 201–202

- capitalized excess earnings method, 220–221
- CCF method, examples using, 203–204
- disadvantages, 212–213
- discounted cash flow method, 205
- economic income, type of benefits as measurement of, 202
- EEMs, advantages and disadvantages of, 221–222
- end-of-period *vs.* mid-period convention, 210–212, 212
- excess earnings treasury method, 218–219
- factors, 208
- Gordon growth model, 198–199
- growth considerations, 208–209
- hybrid models for valuing intangibles and goodwill, 217–218
- multi-stage patterns, 199, 199
- net cash flow to equity, 202, 202
- net cash flow to invested capital, 202–203, 203
- single-stage or multi-stage model, 200, 200
- single-stage patterns, 199, 199
- stage of business, 209, 210
- terminal value calculations, 213–216
- trend analysis, 209
- two-stage discounted cash flow method, examples using, 206–208
- two-stage model, 205–206
- unweighted average method, 201, 201
- weighted average method, 201, 201
- income statement, 50–51
 - common methods-based economic normalizing adjustments, 93–96
- income tax effect on economic and normalizing adjustments, 97
- independent appraiser, 16
- indirect valuation of equity, 115
- industry analysis and tools, 37
 - broad factors analysis, 38
 - Five Forces Analysis (Porter), 37, 37
 - industry structure, concentration, and life cycle, 37
 - McKinsey 7-S model, 38, 38
- industry benchmarking
 - analysis and sources of data, 62–65
 - consideration of, 119
- industry information, 35–36
- industry reports, 186
- industry risk premium (IRP), 156
- information gathering, 34
 - company research, 34–35
 - economic information, 35
 - industry information, 35–36
- initial public offering (IPO), 264, 288
- “in-place” value of assets, 21
- Institute for Credentialing Excellence (ICE), 23
- Institute of Business Appraisers (IBA), 23, 341
- insurance policies, 374
 - purpose of valuation, 374
 - types of insurance policies and valuation context, 374
 - valuation approaches, 374
- intangible assets, 192, 217, 370, 371
 - hybrid models for valuing, 217–218
 - methods for valuing, 371–373
 - strategic uses of EEMs for identifying, 217–218
- intangibles, 93
- Intangibles–Goodwill and Other* (ASC 350), 16
- interest-bearing debt, 231
- interest coverage ratio, 59
- internal liquidity ratios, 54–55
- Internal Revenue Code (IRC), 12, 293, 356
 - Section 83, 356
 - Section 401(a)(28)(C), 16, 363
 - Section 409A, 356
 - Section 1042, 363
 - Section 2703, 27, 318
 - Section 6662, 27–28
 - Section 6695A, 28
- Internal Revenue Service (IRS), 8, 25–28, 363
 - control and, 287
 - Discount for Lack of Marketability: Job Aid for IRS Valuation Professionals*, 297
 - and foundations of modern valuation theory, 28
 - IRS allocation, 218
 - IRS Form 8594, 15, 15, 15n9
 - view on DLOMs and liquidity, 297–298
- International Accounting Standards Board (IASB), 29–30
- International Business Brokers Association (IBBA), 254
- international business valuation glossaries, 341–342
- International Financial Reporting Standards (IFRS), 29, 185, 349
- International Organization of Securities Commissions (IOSCO), 29
- international standards comparison charts, 340–341
- 2001 *International Glossary of Business Valuation Terms* (“2001 IGBVT”), 3, 9n2, 361
- 2021 *International Valuation Glossary–Business Valuation* (“2021 IVGBV”), 3, 19n16, 361
- International Valuation Standards Council (IVSC), 24, 341
- intrinsic value, 19, 104n2
- inventory turnover, 55
- inventory valuation, 92
- invested capital measures of earnings, 118–119
- investing cash flow, 51
- investment company discount, 319
- investment value, 19
- investment value principle, 10–11
- IOSCO. *see* International Organization of Securities Commissions (IOSCO)
- IPCPL. *see* implied private company pricing line (IPCPL)
- IPO. *see* initial public offering (IPO)
- IRC. *see* Internal Revenue Code (IRC)
- IRP. *see* industry risk premium (IRP)
- IRS. *see* Internal Revenue Service (IRS)
- ISOs. *see* incentive stock options (ISOs)
- IVSC. *see* International Valuation Standards Council (IVSC)

J

Estate of Jameson v. Commissioner, 314
Janda v. Commissioner, 314, 316
 Jeff Jones model, 178
Estate of Jelke v. Commissioner, 314
 Job Aid (IRS), 297–298
 Johnson Study (1999), 305–307
Aaron Jones v. Commissioner, 128
 judicial developments

- affecting control premiums and noncontrolling discounts, 295–296
- and DLOM, 314

 jurisdiction and regulatory environment, 391
 jurisdictional exception, 14

- in valuation assignments, 392

 justification of purchase method, 327–328, 328

K

Jacob S. Kamborian v. Commissioner, 320
Estate of Kelley v. Commissioner, 296, 314
 key person discount, 318
Kosman v. Commissioner, 320
Kress v. United States, 128
 Kroll Cost of Capital Navigator Risk Premium Report Study, 153, 158
Kumho Tire Co. v. Carmichael, 8n1

L

Clarissa W. Lappo v. Commissioner, 314
 layering effect, 77
 leases, 93
 lenders, 17
 lending, 17
 letter of transmittal, 397
 letter stock. *see* restricted stock
 levels of value, 285–286, 286

- entity-level discounts and adjustments, 286
- shareholder-level discounts and adjustments, 286

 liability issues, 395
 limiting conditions, 22
 liquidation value, 20–21, 214
 liquidity, IRS view on, 297–298
 LiquiStat, 308
 litigation, 13–14, 350

- expert appointment, 353
- Federal Rules of Evidence and Civil Procedure, 353–355
- marital dissolution and equitable distribution, 352–353
- procedural differences, 351–352
- professional standards and services applicable to litigation engagements, 339–340
- report, 355
- shareholder oppression, 352
- standards of value, 352

- support services, 339
- understanding roles of expert, 351

 long-term considerations, 120
 long-term debt-to-equity ratio (debt/equity ratio), 58
 look-back period, selection of appropriate, 120–121**M**

M&A. *see* mergers and acquisitions (M&A)
 MAFF. *see* Master Analyst in Financial Forensics (MAFF)
Maggos v. Commissioner, 296
 Maher Study (1976), 303
 Management Planning Study (2000), 306–307
Mandelbaum v. Commissioner, 312–314
Mandelbaum decision and effect on marketability discounts, 312–314, 313
 marital dissolution, 352–353
 marketability discounts, *Mandelbaum* decision and effect on, 312–314
 marketability/liquidity

- controlling *vs.* noncontrolling interests, 299–300
- discounts for lack of, 296
- factors influencing DLOM, 300
- IRS view on DLOMs and liquidity, 297–298
- subject company factors, 298–299

 market absorption discount, 317
 market approach and methods, 107, 228, 230

- asset value, 231–232
- best-fit benchmarking in GPCM, 234–235, 233
- completed transaction method, 235–262
- data, 255
- enterprise value, 231–232
- guideline public company method, 262–271, 263
- MVIC, 231–232
- primary market approach methods, 233
- prior transactions involving subject company, 271–272
- sales, 254
- sale transaction multiples, 256
- statistical analysis commonly used in, 272–282
- total market analysis in CTM, 233, 234
- value, 231–232

 market data, 186
 market transaction pricing, 229
 market value of invested capital (MVIC), 167, 202, 228, 230–232, 231, 232, 255, 329, 355

- calculation across databases, 267

 Master Analyst in Financial Forensics (MAFF), 23
 Master Certified Business Appraiser (MCBA), 23
 MCAPM. *see* modified capital asset pricing model (MCAPM)
 MCBA. *see* Master Certified Business Appraiser (MCBA)
McCord v. Commissioner, 314
 McKinsey 7-S model, 38, 38
 measures of central tendency, application of, 65–66
 median, 273–274
Estate of Mellinger v. Commissioner, 296, 317

- Merger & Acquisition Master Intermediary (M&AMI)
 certification, 254
 mergers and acquisitions (M&A), 12
 adjustments and enhancements in, 347–350
 advisors, 254
 core valuation approaches, 347
 objectives of, 346
 PitchBook, 350
 valuation process, 346–347
 Mergerstat Review/FactSet Review, 293
 methods-based and levels of value normalization adjustments,
 74–77, 76, 77, 84–85
 agency costs and control concepts, 86
 discretionary spending or perks, 87
 excess employees or payroll, 87
 excess or below-market officer/owner compensation, 86
 nonoperating or idle assets used for personal benefit, 87
 related-party transactions, 86
 MicroBilt, 64
 mid-period convention, 210–212, 212
 mid-period discounting conventions, 211
 mid-period net present value formula, 210
 mid-period present value factor formula, 211
Estate of Mitchell v. Commissioner, 296
 mode, 274
 Model Business Corporation Act, 18
 modern valuation theory, foundations of, 28
 modified capital asset pricing model (MCAPM), 87,
 162–163, 163
 Morningstar Principia, 290
 Moroney Study (1973), 303
 MPEEM. *see* multi-period excess earnings
 method (MPEEM)
 multi-period excess earnings method (MPEEM), 217–218,
 369, 372
 multi-stage model, 200, 200
 multi-stage patterns, 199, 199
 multi-year financial data, best practices for structuring, 53
Estate of Murphy v. Commissioner, 296
 MVIC. *see* market value of invested capital (MVIC)
- N**
- NACVA. *see* The National Association of Certified Valuers
 and Analysts (NACVA)
 Nasdaq. *see* National Association of Securities Dealers
 Automated Quotations (Nasdaq)
 The National Association of Certified Valuers and
 Analysts (NACVA), 12, 23–24, 250, 327, 337, 341,
 378, 388, 393
 advisory briefs, 340
 and ethics FAQ library, 340
 principles-based professional standards, 337–338
 professional services, 338
 professional standards, 337–340
 review engagements, 338
 standards board, 340
 valuation services engagements, 338
 National Association of Securities Dealers Automated
 Quotations (Nasdaq), 262
 National Commission for Certifying Agencies (NCCA), 23
 nature of the business, 105
 NAV. *see* net asset value (NAV)
 NCCA. *see* National Commission for Certifying Agencies
 (NCCA)
 net asset value (NAV), 184, 290
 sources of data used to estimate, 185–187
 net cash flow, 202
 CCF method using, 204
 to equity, 202, 202
 to invested capital, 202–203, 203
 method using, 204
 net fixed asset turnover, 55
 net income, 169, 169
Estate of Newhouse v. Commissioner, 320
 New York Stock Exchange (NYSE), 262
 nominal rate of return, 164
 nonconformance with GAAP, 81–83
 noncontrolling discounts, 293–294
 noncontrolling interest, 105, 299–300
 sources of empirical data on, 288–290
*Noncontrolling Interest Discount Database Guideline
 Reports* (PPI), 289–290
 nonoperating or idle assets used for personal benefit, 87
 normal distribution, 279
 normalization adjustments, 48
 normalization process, 69
 changes in accounting principles, 81
 common methods-based economic normalizing
 adjustments, 91–96
 cost of capital considerations, 87–89
 critically evaluating normalization adjustments, 89–91
 extraordinary and nonrecurring, 77–79
 financial statement trend analysis and benchmarking,
 adjustments for, 77–84
 income tax effect on economic and normalizing
 adjustments, 97
 layers of normalizing adjustments, 74–77
 levels of value, 71–74, 72, 73
 methods-based and levels of value economic normalization
 adjustments, 84–87
 nonconformance with GAAP, 81–83
 normalizing financial statements for trend analysis and
 benchmarking, 77
 objectives of layers of normalizing financial statements,
 70–71
 operating *vs.* nonoperating, 79–81
 taxes for pass-through entities (PTEs), 84
 tax *vs.* GAAP *vs.* economic substance in valuation, 70

normalized balance sheets, 99–100, **99–100**
 normalized income statements, 100–101, **100–101**
 normalizing financial data, 44
 North American Industrial Classification System (NAICS)
 code, 65, 236
The Northern Trust Company v. Commissioner, 320
Norton Co. v. Smyth, 314
 notes receivable, 91–92
 NYSE. *see* New York Stock Exchange (NYSE)

O

OCBOA. *see* other comprehensive basis of accounting (OCBOA)
 OCF/LTD. *see* operating cash flow-to-long-term debt
 (OCF/LTD)
 OCF/TD. *see* operating cash flow-to-total debt ratio
 (OCF/TD)
 off-balance-sheet liabilities on appreciated assets,
 190–191, **191**
Offenbecher v. Baron Services, Inc., 314
Okerlund v. United States, 314
 OLE. *see* operating leverage effect (OLE)
Estate of Oman v. Commissioner, 318
 operating cash flow, 51
 operating cash flow ratio (OCF Ratio or CFO Ratio), 59
 operating cash flow-to-long-term debt (OCF/LTD), 59
 operating cash flow-to-total debt ratio (OCF/TD), 59
 operating efficiency ratios, 55–56
 operating expenses/sales (%), 56
 operating leverage effect (OLE), 57
 operating margin (%), 56–57
 operating profitability ratios, 56–57
 operating *vs.* nonoperating items, 96
 optimal capital structures, 114–115
 oral reports, considerations for, 391
The Orchard Enterprises, Inc., In re Appraisal of, 157n19
 orderly liquidation, 21, 185
 order of investment risk, 11, **11**
 other comprehensive basis of accounting (OCBOA), 62
 Over the Counter (OTC) Bulletin Board, 262
 overstatement, quantifying, 293, **293**

P

P/DE. *see* price to discretionary earnings (P/DE)
 partner/shareholder disputes, 13
 Partnership Profiles, Inc. (PPI), 289–290
 pass-through entities (PTEs), 127
 taxes for, 84
Estate of Paul Mitchell, 318
 payables turnover, 55
 PCAOB. *see* Public Company Accounting Oversight Board
 (PCAOB)
 pension benefits, 373
 key elements in pension benefit valuation, 373
 overview of defined benefit pension plans, 373
 valuation methods, 373–374

personal goodwill, 217, 353
 PEST analysis. *see* broad factors analysis
Peter S. Peracchio, 314
Pierce v. Commissioner, 128
 PitchBook, 350
 plain vanilla bonds, 359
 Pluris DLOM database, 307–308
 positively skewed distribution, 279
 PPA. *see* purchase price allocation (PPA)
 PPI. *see* Partnership Profiles, Inc. (PPI)
 practical valuation approaches, 361
 preferred stock valuation, 357
 pre-initial public offering (pre-IPO) studies, 301, 309–312,
 309–311
 challenges to pre-IPO studies, 311–312
 Emory studies, 309
 Hitchner study no. 1, 310
 Hitchner study no. 2, 311
 Willamette Management Associates studies, 309–310
 premise of value, 20
 going concern value, 20
 liquidation value, 20–21
 premium
 calculating, 291, **291**
 historical premium compilation, 291–292, **291–292**
 issues related to *FactSet Review* data, 292–293
 pre-tax cost of capital, 169
 price to discretionary earnings (P/DE), 251
 price to revenue (P/R) multiples, 251
 price-to-earnings (P/E) ratio, 152
 price-to-net asset value (P/NAV) method, 290
 principle of substitution, 10
 principles-based approach, 337
 prior transactions, 271–272
 private company survival rates, 47, 47
 professional standards
 international business valuation glossaries, 341–342
 NACVA Professional Standards, 337–340
 and services applicable to litigation engagements,
 339–340
 US and International standards comparison charts,
 340–341
 as valuation roadmap, 30
 profitability, 51
 pro forma cash flow analysis, 44
 projections, 111–113, 123
 prospective economic income, 112
 PTEs. *see* pass-through entities (PTEs)
 Public Company Accounting Oversight Board (PCAOB),
 263
Pueblo Bancorporation v. Lindoe, Inc., 314
 purchase price allocation (PPA), 217, 365
 Pure Play MVIC (PPMVIC) multiples, 255
 purposes for valuing a business, 12
 Pythagorean means, 282

Q

QMDM. *see* quantitative marketability discount model (QMDM)

QRP. *see* qualified replacement property (QRP)

qualified replacement property (QRP), 363

qualitative analysis, 33

application to standards and generally accepted practices, 34

applying information, 36

economic analysis, 36

economy affects industries and companies; industry affects companies, 33

industry analysis and tools, 37–38

information gathering, 34–36

qualitative factors, 38–39

impact of qualitative factors on valuation process, 39

report presentation, 39

site visits and interviews, 36

quality control, 401

Quantifying Marketability Discounts, 315

quantitative analysis, 43

consideration of other evidence in forecasting process, 66

financial statement and trend analysis, 50–54

financial tests, 59–62

framework, 47–49

industry benchmarking analysis and sources of data, 62–65

key financial ratios, 54–59

statistical analysis, 65–66

valuation date considerations, 45–47

quantitative marketability discount model (QMDM), 314

basic framework for, 315, 315

court challenges to, 316

development of, 315

using, 315–316

quartiles, 273–274

quick ratio, 54

R

rate of return/level of risk principle, 11

raw data, 251

R.D. Clark & Sons, Inc. v. Clark, 128

real estate investment trust (REIT), 289

real rate of return, 164

real rates as component of cost of capital, 164

reasonable rate method, 220–221

rebuttal, 394

receivable turnover, 54–55

reconciliation, 326–327, 326

benefits of, 331

best practices for, 332–333

definition of, 325

importance in business valuation, 326

importance of, 331–332

risks of not performing, 331–332

steps to perform effectively, 332

tips for improving, 333

valuation analysis, common errors in development and reporting of, 333–334

regulatory bodies, legal and regulatory requirements driven by, 25–30

REIT. *see* real estate investment trust (REIT)

related-party transactions, 86

relief from royalty method (RRM), 372

replacement cost, 185

report date, 397

reporting basis of subject company's financials, 70

report presentation, 39

reports, types of, 387–393

residual value. *see* terminal value

restricted stock agreements, 318

restricted stock studies, 302–308

Columbia Financial Advisors, Inc. studies (2000), 306

critical observations related to, 308

FMV Opinions (2001), 304–305

Gelman study (1972), 303

Hall and Polacek study (1994), 304

Hertzel Smith study (1994), 305

Johnson Study (1999), 305–307

Maher study (1976), 303

Management Planning study (2000), 306–307

Moroney study (1973), 303

overall observations regarding empirical studies, 312

Pluris DLOM database, 307–308

Securities and Exchange Commission study (1971), 303–304

Silber study (1991), 304

Stryker and Pittock study (1983), 304

Trout study (1977), 303

Willamette Management Associates study (1981–1984), 303

restrictive agreement discount, 318

retainers, 382

return on assets (ROA), 57

return on equity (ROE), 57

revenue growth, 50

Revenue Procedure 66–49 (1966), 26

Revenue Procedure 98–34 (1998), 27

Revenue Ruling 59–60 (1959), 26

Revenue Ruling 65–193 (1965), 26

Revenue Ruling 68–609 (1968), 26

Revenue Ruling 77–287 (1977), 27

Revenue Ruling 81–253 (1981), 27

Revenue Ruling 83–120 (1983), 27

Revenue Ruling 93–12 (1993), 27

revenue synergies, 347

review engagements, development and reporting standards for, 338

review report, 390–391

RICS. *see* Royal Institution of Chartered Surveyors (RICS)

risk adjusted factors, 149–151

risk-free rate, 151

Risk Management Association (RMA), 62–63

database, 274

risk (operating) analysis ratios, 57–58
 Risk Rate Component Model (RRCM), 175, 175–176
 RMA. *see* Risk Management Association (RMA)
 ROA. *see* return on assets (ROA)
Estate of Roark v. Commissioner, 13
 ROE. *see* return on equity (ROE)
 Royal Institution of Chartered Surveyors (RICS), 25, 341
 RRCM. *see* risk rate component model (RRCM)
 RRM. *see* relief from royalty method (RRM)
 rules-based standards, 337
 Rules Enabling Act, 353
 rules of thumb, 329, 329

S

salvage value, 214
 sanity checks, 327

- benefits of, 331
- best practices for, 332–333
- definition of, 325
- dividend-paying capacity, 330–331
- hypothetical willing buyer and willing seller test, 330
- importance in business valuation, 326
- importance of, 331–332
- justification of purchase method, 327–328, 328
- risks of not performing, 331–332
- rules of thumb, 329, 329
- steps to perform effective, 332–333
- tips for improving, 333
- valuation analysis, common errors in development and reporting of, 333–334

 Schilt's risk premium guidelines, 174–175
 S corporation conversions, 217
 S corporation equity adjustment (SEA), 138–140
 S corporation equity adjustment multiple (SEAM), 140–141
 S corporations, 363
 SDE. *see* seller's discretionary earnings (SDE)
 SDE multiples, 245
 SEA. *see* S corporation equity adjustment (SEA)
 SEAM. *see* S corporation equity adjustment multiple (SEAM)
 SEC. *see* U.S. Securities and Exchange Commission (SEC)
 SEC studies, 289
 SECURE 2.0 Act, 363
 Securities and Exchange Commission study, 303–304
 Securities Exchange Act (1934), 269
 SEDAR. *see* Canadian System for Electronic Document Analysis and Retrieval (SEDAR)
 seller's discretionary earnings (SDE), 11, 213
 SFAS. *see* Statement of Financial Accounting Standards (SFAS)
 shareholder-level discounts and adjustments, 286
 shareholder oppression, 352
 short-term considerations, 120
 Silber Study (1991), 304
Estate of Simplot v. Commissioner, 295, 320
 single-stage model, 200, 200, 209
 single-stage patterns, 199, 199

site visits and interviews, 36
 size premium, 154–155
 solvency ratios. *see* internal liquidity ratios
 S&P Capital IQ, 269
 special purpose valuation

- litigation, 350–355
- mergers and acquisitions, 346–350

 SSFS. *see* Statement on Standards for Forensic Services (SSFS)
 SSVS. *see* Statement on Standards for Valuation Services (SSVS)
 standard deviation, 278–279, 278
 Standard Industrial Classification (SIC) code, 65, 236, 307
 standard of value, 17, 20, 105

- fair market value, 17–18
- fair value for financial reporting, 18
- fair value under state statute, 18–19
- intrinsic value, 19
- investment value, 19
- synergistic value, 19

 Statement of Financial Accounting Standards (SFAS), 27, 29, 365
 Statement on Standards for Forensic Services (SSFS), 24
 Statement on Standards for Valuation Services (SSVS), 340
 statistical analysis, 65–66, 242

- arithmetic mean, 272–273
- coefficient of variation, 280
- commonly used in market approach, 272–282
- data stronger through elimination of outliers, 280–282, 281–282
- geometric mean, 275–276
- harmonic mean, 276–277
- median and quartiles, 273–274
- mode, 274
- standard deviation, 278, 278–279

 statutory fair value, 19
 stock repurchase agreements, 15
 stock sale, 255
 stock sale transaction multiples, 256
 Stryker and Pittock Study (1983), 304
 subject company, 21

- adjusting dividend-paying capacity to match, 331
- prior transactions involving, 271–272

 subject interest attributes, 21
 summary report, 389, 389
 supply-side ERP, 152–153
 swing vote premiums, 294–295
Swope v. Siegel-Robert, Inc., 314
 SWOT analysis, 36, 36
 synergistic value, 19, 104n2
 synergy analysis, 347

T

TagniFi, 267, 269
 tax-affecting pass-through entities, 127, 129

- controlling interests in, 133
- court cases, 127–129, 127–128

Delaware MRI model, 131, 131
 factors, 132
 noncontrolling interests in, 133–134
 valuation issues, 129
 Van Vleet model, 130, 130–131
 tax-basis accounting, 70
 tax compliance, 12–13
 Taxpayer Relief Act of 1997, 13
 tax penalties, 30
 tax-related valuations, 12
 tax returns, 186
 terminal value, 149
 calculations, 213
 exit multiple as terminal value, 213–214
 exit multiple examples, 214
 H-model as, 214–216
 salvage value or liquidation value, 214
Estate of Thaleimer, 320
Estate of Josephine Thompson, 296
 TIC. *see* total invested capital (TIC)
 time frames for valuation, 46
 timing of income and expense recognition, 93–94
 total asset turnover, 56
 total beta model, 181
 total debt-to-total assets ratio (debt/assets ratio), 59
 total debt-to-total invested capital ratio (debt/capital ratio), 58
 total invested capital (TIC), 235
 total market analysis in CTM, 233, 234
 transactional, purpose for valuing a business, 14–15
 transaction data, 255
 transaction price, 369
 treasury regulations, 287, 317
 trend analysis
 normalizing financial statements for, 77
 normalizing historical financial statements for, 74
 Trout Study (1977), 303
Estate of True v. Commissioner, 296
 two-stage discounted cash flow method
 assumptions used in, 206, 207, 208
 examples using, 206
 two-stage model, 199, 205–206

U

Uniform Business Corporation Act, 18
 Uniform Standards of Professional Appraisal Practice (USPAP), 24, 340
United States v. Fourteen Packages of Pins, 17n13
 unweighted average method, 121, 201, 201
 US Constitution, 8
 US Department of Labor (DOL), 16, 28, 363
 US Securities Act (1933), 269
 US Securities and Exchange Commission (SEC), 28–29, 254, 301–303
 US Small Business Administration (SBA) rules, 17
 US standards comparison charts, 340–341

US Supreme Court, 353
 USPAP. *see* Uniform Standards of Professional Appraisal Practice (USPAP)

V

valuation, 8, 345
 addressing conflicts of interest in valuation
 engagements, 378
 analysts, 8, 12, 94, 234, 292, 318, 350
 appraisal, 9
 approaches, 106, 373–374
 asset approach, 106
 assignments, 391
 brief history of valuation industry, 8–9
 business life cycle, stages of, 46, 46
 common errors in development and reporting of, 333–334, 401
 concepts, 9–12
 considerations, 45
 controlling *vs.* noncontrolling interest, 105
 date, 380, 397
 date and time frame considerations in determining
 adjustments, 46
 development and reporting standards for, 338
 disclosure and substantiation requirements, 13
 effective use of industry and economic research in
 valuation reports, 39
 foundational considerations, 21–22
 impact of qualitative factors on, 39
 importance of reconciliation and sanity checks in, 326
 income approach, 107
 jurisdictional exceptions in valuation assignments, 392
 market approach, 107
 matter of perspective, 104–105
 methods-based normalization, 48
 multiples, 255
 multiple valuation methods, 107
 other factors, 11–12
 private company survival rates, 47, 47
 process pyramid, 104
 professional organizations, 23–25
 professional standards as valuation roadmap, 30
 purpose and use of, 380
 purpose-driven process, 104
 purposes for valuing business, 12–17
 qualifications and experience of valuation
 analysts, 22
 reports, 186, 387, 396
 standards, 327
 and subsequent events, 21
 theoretical basis of value, 10–11
 valuation engagements acceptance, 377
 value of particular business, 9–10
 writing techniques for valuation reports, 401–402
 valuation analyst, 23
 valuator, 22

- value
 - controlling *vs.* noncontrolling interests, 21–22
 - of particular business, 9–10
 - theoretical basis of, 10–11
 - valuing intangible assets, 371
 - ValuSource M&A Comps, 259–261, **260**
 - ValuSource Market Comps (VSMC), 250–252, **250**
 - Van Vleet Model, 130, **130–131**, 136–138, **137**, **138**
 - vertical analysis. *see* common-size analysis
 - VerticalIQ, 64
 - VSMC. *see* ValuSource Market Comps (VSMC)
- W**
- WACC. *see* weighted average cost of capital (WACC)
 - Wall v. Commissioner*, **127**, 128, 314
 - Wallace v. United States*, 320
 - weighted average cost of capital (WACC), 87, 115, 166–168, **168**, 202, 248, 347
 - weighted average method, 121, 201, **201**
 - Estate of Weinberg v. Commissioner*, 296, 316
 - Willamette Management Associates Study (1981–1984), 303, 309
 - Estate of Winkler v. Commissioner*, 294, 320
 - with and without method (WWM), 372
 - working capital changes, 117
 - Wright v. Philips*, **128**
 - writing techniques for valuation reports, 401–402
 - WWM. *see* with and without method (WWM)
- Z**
- zero-coupon bonds, 359

