

## Law Firms

Bingham McCutchen LLP  
Curtis, Mallet-Prevost, Colt & Mosle LLP  
Jenner & Block LLP  
Jones Day LLP  
King & Spalding LLP  
Kirkland & Ellis LLP  
Slaughter and May LLP  
Sutherland Asbill & Brennan LLP  
White & Case LLP  
Willkie Farr & Gallagher LLP

## Corporations

3M Company  
Accenture Ltd.  
AngloGold Ashanti Ltd.  
AT&T Inc.  
Bank of America Corporation  
Cargill, Inc.  
General Motors Corporation  
Sallie Mae Inc.  
St. Paul Travelers Companies Inc.  
Tyco International Ltd.  
Wal-Mart Stores, Inc.

## Organizations

Biotechnology Industry Organization  
Mortgage Bankers Association  
PhRMA  
U.S. Chamber of Commerce

## Governments

Australian Government Solicitor  
Australian Taxation Office  
Canada Revenue Agency  
Department of Justice Canada  
Internal Revenue Service

## ECONOMISTS

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# PRECISION ECONOMICS LLC

Economic Expertise for Litigation,  
Regulation and Public Policy

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# SERVICES

## Transfer Pricing

The economists at Precision Economics have analyzed a variety of transfer pricing topics for taxpayers, the Internal Revenue Service, the Australian Taxation Office and the Canada Revenue Agency. Our transfer pricing economists have been engaged in more than 300 assignments in the context of litigation, APAs, FIN 48 review and documentation planning studies.

Precision Economics has served as economic experts in many of the largest transfer pricing matters in litigation in recent years. This includes drafting a lead transfer pricing economic report in the largest transfer pricing dispute and settlement to date between the IRS and GlaxoSmithKline.

In Australia, Precision Economics provided direct and cross examination testimony concerning an expert witness report in Australia's first major transfer pricing litigation, involving Roche Pharmaceuticals.

Precision Economics was also involved in the first major transfer pricing case in the Federal Court of Australia. It provided direct and cross examination testimony concerning three expert witness reports it submitted to the Court in a matter involving SNF.

In the Tax Court of Canada, Precision Economics provided direct and cross examination testimony covering two transfer pricing reports it submitted in a dispute involving General Electric Company.

In U.S. Tax Court, Precision Economics provided direct and cross examination testimony involving intercompany services of Weekend Warrior Trailers, Inc.

In several other disputes involving potential multi-billion dollar adjustments involving cost sharing and other issues, Precision Economics has served as a transfer pricing economic expert for either taxpayers or tax authorities around the world.

## Valuation & Damages

Precision Economics conducts valuations for investment, litigation, and tax purposes, having experience in over 75 cases spanning a variety of industries. In addition to numerous academic publications and seminars, our valuation expertise has been covered by The Wall Street Journal, Newsday, Fortune and CFO.com. Our clients include law firms, corporations, and the Internal Revenue Service.

Our valuation experience has expanded beyond traditional valuation and antitrust analyses into commercial damage analysis and intellectual property valuation. As a result, we have testified on such matters as punitive damages, mitigation, executive compensation, lost profits, and commission rates.

## International Trade

Our expertise in international trade focuses on anti-dumping, where we have performed economic analyses in matters before the U.S. International Trade Commission, the U.S. Department of Commerce, and the Canadian International Trade Tribunal. We have provided testimony and written economic reports for foreign and domestic firms involving products ranging from steel and ferromanganese to catfish and baby food.

## Public Policy

Precision Economics has analyzed several financial and economic issues for public policy, including: studies of R&D tax credits, industry profitability, operating loss carry forwards, and investment. Our economists and affiliates present our findings at academic seminars, to the media, and at government hearings.

## Expert Testimony

Australian Administrative Appeals Tribunal

Canadian International Trade Tribunal

Delaware Chancery Court

Federal Communications Commission

Federal Court of Australia

Federal District Court

Superior Courts

Tax Court of Canada

U.S. Bankruptcy Court

U.S. International Trade Commission

U.S. Tax Court

## Publications

Business Valuation Review

Business Valuation Digest

Corporate Business Taxation Monthly

Corporate Governance Advisor

Journal of Forensic Economics

Southwestern Journal of Economics

Tax Notes

Transfer Pricing Handbook

Transfer Pricing Report

EXPERIENCE