



**CITRIN COOPERMAN®**  
Accountants and Advisors



TRANSFER PRICING

## Focused on Maximizing Growth and Building Value

[Related Practices](#)

[International Tax Services](#)

Citrin Cooperman has been instrumental in assisting multinational companies maximize growth and build value within their global organization, particularly in the area of transfer pricing. To that end, our multi-phased approach to transfer pricing starts by conducting business interviews and discussions with a company's key personnel in order to gain an understanding of the business model and the issues critical to their success. We then identify the best transfer pricing methodology and determine the appropriate arm's-length pricing structure through financial and economic analyses to help them achieve their business and tax objectives.

### How Citrin Cooperman Can Help

At Citrin Cooperman we are working with multinational companies who are experiencing significant growth globally to develop tax-efficient strategies that

conceptualize, analyze, and institute appropriate transfer pricing principles from the outset. Our transfer pricing services optimize the cross-border transfer pricing of goods, services, intellectual property, and financial instruments between related companies. Our transfer pricing team brings a personal touch, along with low partner-to-staff ratio, allowing us to continue our services beyond completion of report and analysis.

#### Related Services

- Contemporaneous documentation studies (ranging from high-level analysis to complete reports) satisfying the local jurisdiction's tax regulations including CbC reporting, master file, and local file;
- Litigation support;
- Global restructuring for tax optimization and/or operational efficiency;
- Structuring for capitalization and repatriation strategies;
- IP migration and planning;
- Implementation;
- Advance Pricing Agreements;
- Review of transfer pricing exposure under ASC 740 (Fin 48); and
- Due diligence.