

Dr. Vladimir Starkov

Director



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Dr. Vladimir Starkov is an economist and a testifying expert specializing in transfer pricing and asset valuation. He has provided consulting services for multinational companies, closely held businesses, tax authorities, attorneys, and other clients. His experience encompasses a variety of industries, including agrosience, automotive, banking, biotechnology, high technology, consumer electronics, manufacturing of consumer and industrial products, electric utilities, pharmaceuticals, petrochemicals, retail, and others.

Dr. Starkov has participated in engagements involving various tax controversy proceedings, including negotiation and implementation support for unilateral and multilateral Advance Pricing Agreements (APA) with tax authorities in North America, Asia, and Europe, design of intercompany pricing methodologies, valuation of intangible property transferred in intercompany transactions, including cost sharing arrangements, and preparation of transfer pricing documentation, including master files and local files for different jurisdictions. Dr. Starkov has conducted business valuation and valuation of intangible assets held by multinational businesses. He analyzed stock option compensation and consulted on strengthening banks' internal controls. Dr. Starkov has submitted policy advice to the Organisation for Economic Co-operation and Development (OECD) on various aspects of transfer pricing rules and testified at OECD public consultation meetings. Over the course of his career, Dr. Starkov has authored whitepapers and bylined articles, and delivered speeches on various topics related to the valuation of intangibles and transfer pricing.

Dr. Starkov holds a PhD and MA in economics from West Virginia University, and an MS in environmental engineering from Mendeleyev University of Chemical Technology, Russia.

Dr. Starkov holds a CVA (Certified Valuation Analyst) and a MAFF (Master Analyst in Financial Forensics) credentials from the National Association of Certified Valuers and Analysts (NACVA).

Education

PhD in economics, West Virginia University

MA in economics, West Virginia University

MS in environmental engineering, Mendeleyev University of Chemical Technology, Russia

Publications

- *NERA Experts Contribute Chapter to "The Future of the Profit Split Method"*
- *Transfer Pricing Roundtable in Financier Worldwide.*
- *Amount B: Facts and Circumstances Matter—Even for Routine Distributors*
- *NERA Experts Offer Insight into OECD Guidance on the Transfer Pricing Implications of the COVID-19 Pandemic*
- *NERA Experts Comment on the OECD Proposal on Pillar One Blueprint*
- *Managing Transfer Pricing in the COVID-Related Economic Downturn*
- *What Is the Value of Users, Anyway? How to Value the User Contribution to Digital Enterprises*
- *NERA Experts Comment on the OECD Proposal for a "Unified Approach" under Pillar One*
- *Transfer Pricing Value Chains and Supply Chains Post-BEPS*
- *NERA Experts Comment on Digital Economy Discussion Paper by Australian Treasury*

- *Russia Adopts Country-by-Country Reporting Legislation*
- *Comments on OECD Request for Input on Work Regarding Tax Challenges of the Digitalized Economy*
- *Russia's Draft Country-by-Country Reporting and Financial Disclosure Legislation*
- *Comments on OECD Discussion Draft on the Revised Guidance on Profit Splits*
- *Comment on OECD Discussion Draft of the BEPS Action 8 "Hard-to-Value Intangibles" Guidance*
- *Economic Analysis for Developing Countries—Comments on the IMF, OECD, UN, and World Bank Toolkit*
- *Applying Scenario Analysis for Computing Discount Rates in Cost Sharing Arrangements*
- *BEPS Action 8: Revisions to Chapter VIII of the Transfer Pricing Guidelines on Cost Contribution Arrangements*
- *Comparability Adjustments in the Absence of Suitable Local Comparables in Emerging and Developing Economies*
- *BEPS Action 8, 9 and 10: Discussion Draft on Revisions to Chapter I of the Transfer Pricing Guidelines (including Risk, Recharacterisation, and Special Measures)*
- *Discussion Draft on BEPS Action 10: Proposed Modifications to Chapter VII of the Transfer Pricing Guidelines Relating to Low Value-Adding Intra-Group Services*
- *Impact of the Russian CFC Law on Inbound Foreign Investors*
- *Value Creation, Comparability and Bargaining Analysis: Key References in Transfer Pricing Going Forward*
- *Comparability Adjustments in the Absence of Suitable Local Comparables in Emerging and Developing Economies*
- *The New Ukrainian Transfer Pricing Regulations: An Overview*
- *Practical Aspects of Implementing Intercompany Royalties, Service Charges, and Development Activities for Russian Affiliates of MNCs*
- *Russia's Expanded Guidance on Transfer Pricing Documentation*
- *Article Series: Location Specific Advantages*
- *Intangible Assets Valuation and High Uncertainty*
- *The New Russian Transfer Pricing Regulations: An Overview*
- *Location Specific Advantages -- Case Studies*
- *New Transfer Pricing Regulations in Russia*
- *Cost Sharing Agreements May Allow Multinational Companies to Reap the Benefits of Intangible Asset Investment*
- *Adjusting Uncontrolled Profit-Based Benchmarks for Differences in Operating Expense Structure*

Practice Areas

International Arbitration

Life Sciences

Transfer Pricing

Valuation

Languages

English, Russian

About NERA

NERA Economic Consulting (www.nera.com) is a global firm of experts dedicated to applying economic, finance, and quantitative principles to complex business and legal challenges. For over half a century, NERA's economists have been creating strategies, studies, reports, expert testimony, and policy recommendations for government authorities and the world's leading law firms and corporations. With its main office in New York City, NERA serves clients from more than 25 offices across North America, Europe, and Asia Pacific.