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Background

Oscar Burakoff is a Principal in Deloitte's Transfer Pricing practice, based in San Diego. He focuses his practice on transfer pricing and valuation and has experience managing global transfer pricing projects covering all types of transactions, including cost sharing, transfers of tangible and intangible property, intercompany services, and financing. Some of Mr. Burakoff's specific areas of focus include intangible property valuation and planning, cost sharing, supply chain optimization and restructuring, and services allocation analyses.

Experiences

Specifically, Mr. Burakoff has experience in:

- · Analyzing and implementing supply chain optimization strategies and restructurings;
- Analyzing numerous intercompany transactions, including tangible property transfers, intangible property transfers, cost sharing, intercompany loans, and a wide range of services transactions;
- Leading the implementation of cost sharing arrangements, including valuing intangibles to determine buy-in
 payments or Platform Contribution Transactions and identifying and analyzing intangible development costs for
 Cost Sharing Transactions;
- · Developing complex, interactive valuation and other quantitative models;
- Performing business optimization strategies, including recommending royalty rates related to design, marketing, and other intangibles;
- Leading and managing the preparation of transfer pricing studies documenting the arm's-length nature of intercompany prices in various industry sectors to satisfy US, OECD, and local-country documentation requirements in countries including the United States, Argentina, Australia, Austria, Belgium, Canada, China, Colombia, the Czech Republic, France, Germany, Hong Kong, Hungary, Italy, Japan, Korea, Mexico, the Netherlands, Poland, Russia, Spain, Sweden, Switzerland, Taiwan, and the United Kingdom;
- $\bullet \quad \text{Valuing trademarks for tax/transfer pricing purposes;} \\$
- Performing cost allocation analyses for numerous clients, including developing complex cost allocation models;
- Representing clients in the negotiation of bilateral and unilateral Advance Pricing Agreements;
- Assisting multinational corporations in a variety of industries in resolving IRS or foreign tax authority transfer pricing tax disputes, including controversies at IRS Exam and Appeals;
- · Advising in the restructuring of transfer pricing systems, including after a merger or acquisition; and
- · Performing business entity valuations for tax purposes.

Mr. Burakoff speaks at a number of professional seminars and has been an instructor for numerous internal transfer pricing training programs. He has also been recognized on multiple occasions as a Rising Star by Expert Guides.



