



NACVA

August 7, 2017

DEPARTMENT OF THE TREASURY
CC:PA:LPD:PR (Notice 2017-28)
Room 5205
P.O. Box 7604
Ben Franklin Station
Washington, DC 20224

By: Certified Mail

Re: Request to Withdraw Proposed Treasury Regulations under Section 2704/Executive Order 13789

Dear Sir/Madam:

The National Association of Certified Valuators and Analysts® (NACVA®) would like to reiterate its/our position regarding the burdensome and complex nature of the “Proposed Regulations Under Section 2704...”.

On or about November, 2016, NACVA submitted a detailed letter in which we explained how these Proposed Regulations would result in changes to valuation methodologies which do not reflect reality, which violate generally accepted valuation methodology, which result in changing many years of United States settled tax law, and other problems.

Further, the withdrawal of these Proposed Regulations would be in accordance with President Trump’s Executive Order 13789, a directive designed to reduce tax regulatory burdens.

We respectfully request that these Proposed Regulations be withdrawn in order to avoid these vexatious problems.

I am attaching hereto a copy of the letter which we sent prior to the hearing in November, 2016 in which we state, in detail, the reasons for our position that the Proposed Regulations should be withdrawn.

It should also be noted that members of the NACVA executive committee also testified at the hearing at the Internal Revenue Service offices in furtherance of our position to withdraw these Proposed Regulations.

Respectfully,
National Association of Certified Valuators and Analysts

Parnell Black, MBA, CPA, CVA
Chief Executive Officer, NACVA
Salt Lake City, UT

Kristopher A. Boushie, CPA, ABV, CFF, CVA, CFE
Former Chair, NACVA Executive Advisory Board
NERA Economic Consulting; Washington, DC



Karen Boulay, MBA, CPA, CVA
Former Chair, NACVA Valuation Credentialing Board
Melanson Heath & Co PC; Nashua, NH

Paul Wonch, MBA, CPA, ABV, CVA, MAFF
Former Chair, NACVA Ethics Oversight Board
Wonch Valuation Advisors, LLC; Indianapolis, IN

Marc Bello, CPA, ABV, CFF, CVA, MAFF, MST
Former Chair, NACVA Litigation Forensics Board
Edelstein & Company LLP; Boston, MA

Carl A. Steffen, CPA, ABV, CFF, CVA, ASA, CBA, ABAR
Former Chair, NACVA Standards Board
WSRP, LLC; Salt Lake City, UT

Rebekah Smith, CPA, CVA, MAFF, CFF
Chair, NACVA Executive Advisory Board
GBQ Consulting LLC, Columbus, OH

David Zarlenga, CVA, CFE
Chair, NACVA Ethics Oversight Board
H & J CPAs, Concord, OH

Mark Hanson, CPA, ABV, CVA
Chair, NACVA Standards Board
Schenck SC, Appleton, WI

Larry Settles, CPA, ABV, CrFA, MAFF
Chair, NACVA Litigation Forensics Board
Lord & Settles, LLC, Combine, TX

Enclosure