
Business Valuation

Revenue Ruling 59-60, 1959-1 CB 237 sets forth the factors to be considered in valuing a closely held business for death tax purposes. They are as follows:

- The history and nature of the business, i.e., the risk and the stability of the business.
- The economic outlook in general, as well as for this industry.
- The book value of the company.
- The company's earning capacity.
- The capacity to pay dividends (not its dividend paying history).
- The goodwill of the company.
- Any recent sales of company stock.
- The value of similar businesses which are publicly traded.

A Formula for Valuing Goodwill

1. Value of tangible assets	\$ _____
2. - Liabilities	(_____)
3. = Net value of tangible assets	_____
4. x Industry percentage return ¹	x _____ % ¹
5. = Annual earnings attributable to assets (line 3 x line 4)	_____
6. Average annual earnings of company ²	_____ ²
7. Earnings from goodwill (line 6 minus 5)	_____
8. ÷ Capitalization rate ³	_____ % ³
9. = Goodwill (line 7 ÷ line 8)	_____
10. Goodwill plus net value of assets (line 9 + line 3)	\$ _____

¹ Industry percentage return: 8% should be used with stable, low-risk businesses and 10% with more hazardous, high-risk businesses.

² The average annual net earnings amount is computed on all the years of operation up to five. This should be before taxes and personal compensation to the owners.

³ Revenue Ruling 68-609 recommends a capitalization rate of 15% for low-risk, stable businesses and 20% for hazardous, high-risk businesses.

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Projected Future Growth

$$\begin{array}{cccccc} \text{___ Years} & \text{___ \% Growth} & \$\text{___} & \times & \$\text{___} & = & \text{___} \\ & & \text{Current} & & \text{Compound} & & \text{Projected} \\ & & \text{Business} & & \text{Interest} & & \text{Business} \\ & & \text{Value} & & \text{Factor} & & \text{Value} \end{array}$$

Note: This is not intended to replace a qualified appraisal.