

Of Counsel, New York

Tax Controversy and Litigation



T: 212.735.3708
roland.barral@skadden.com

Education

LL.M. (Taxation), New York
University School of Law, 1993

J.D., Rutgers University School of Law,
1983 (with honors; Managing Editor,
*Rutgers Computer & Technology
Law Journal*)

B.A., Rutgers University, 1980
(with honors)

Bar Admissions

U.S. Tax Court
New York
New Jersey
District of Columbia

Selected Publications

"IRS Large Business and International
Division Increasingly Looks to
Chief Counsel's Office to Advance
Initiatives," *Skadden, Arps, Slate,
Meagher & Flom LLP*, April 29, 2014

"Letter From America – The US
Summons Power," *The Tax Journal*,
June 29, 2009

Since joining Skadden in early 2014, Roland Barral has represented high-profile clients in all phases of civil audits, administrative appeals and litigation.

With more than 30 years of experience at the Internal Revenue Service (IRS), Mr. Barral last held the position of area counsel for financial services (large business and international division) within the Office of Chief Counsel. In this role, he served as the chief legal and strategic adviser to the IRS on all financial services industry matters. Mr. Barral developed and oversaw high-profile litigation strategies for the IRS and was instrumental in framing alternative dispute resolution strategies.

Mr. Barral also worked as the northeast area team leader within the Office of Chief Counsel, charged with cross-divisional oversight and leadership of the office's field divisions in New York, Connecticut and Massachusetts. Earlier in his career, he served as acting division counsel in the Office of Chief Counsel and as an assistant district counsel, special litigation assistant and attorney within the chief counsel's office, responsible for developing and litigating matters before the U.S. Tax Court involving complex U.S. and international issues.

His work while at the Office of Chief Counsel encompassed multiple areas, including oversight of taxpayer matters in the financial services industry; executive leadership related to numerous programs, including the Office of Chief Counsel Tax Shelter Promoter Program, the Global High Wealth Program and the Foreign Account Tax Compliance Act; and initiatives for global dispute resolution and settlements on a wide range of issues, including transfer pricing, financial products and debt-equity characterizations.

A major focus of Mr. Barral's practice has been working with clients in dispute resolution efforts and audit streamlining involving high-stakes and sensitive matters on behalf of clients in the financial services, pharmaceutical, heavy manufacturing, telecommunications, technology and social media industries.

In 2006, Mr. Barral was awarded the Presidential Rank Award by President George W. Bush for his meritorious service to the United States. He also was honored with the IRS Chief Counsel's Award (2003 and 2014); the IRS Commissioner's Award (2001, 2006, 2007 and 2010); the Albert Gallatin Award, the United States Treasury's highest career service award (2014); the United States Treasury's Meritorious Service Award (2014); and Tax Executives Institute's Distinguished Service Award (2014). In addition, he has been named to *Best Lawyers' Ones to Watch in America* (2026).

Mr. Barral is a frequent speaker on topics related to his practice, including at the Practising Law Institute, the Tax Executives Institute and the New York University Tax Controversy Forum.