

# David Berke

Skadden

Counsel, Washington, D.C.

Tax



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## Education

J.D., Yale Law School, 2017  
B.A., Columbia University, 2012

## Bar Admissions

New York  
District of Columbia  
U.S. Tax Court

## Government Service

Special Counsel, Office of Chief  
Counsel (International), Internal  
Revenue Service (2023-25)

David Berke represents multinational companies on a broad range of tax matters, including tax planning and transactional matters.

Mr. Berke advises on tax issues arising in cross-border and domestic contexts, including in internal integration and restructuring transactions. He frequently counsels clients on a variety of international tax issues, including subpart F, tax treaties, transfer pricing, and foreign tax credits. He advises clients in connection with various corporate transactions, including mergers and acquisitions, liquidations and distressed situations, and financing transactions.

Mr. Berke also assists clients with tax controversies and dispute resolution in connection with IRS audits, refund claims and administrative proceedings, and litigation. He has advised on numerous high-stakes, precedent-setting tax cases.

He previously worked as a special counsel in the IRS Office of Associate Chief Counsel (International) (ACCI), where he drafted guidance (including regulations and sub-regulatory guidance) and advised on complex and high-profile controversy matters.

Mr. Berke is a frequent speaker on domestic and international tax topics at various bar association events and conferences. Prior to his time at ACCI, Mr. Berke worked as an associate at Skadden.