

David Farhat

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Education

LL.M., Georgetown University
Law Center, 2003

J.D., Syracuse University
College of Law, 2002

B.A., Syracuse University, 1999

Bar Admissions

District of Columbia

New York

Government Service

Team Leader, Advance Pricing and
Mutual Agreement, Internal Revenue
Service (2009-15)

General Attorney, Internal Revenue
Service (LB&I) (2006-09)

David Farhat focuses on all phases of international tax planning and dispute resolution, having advised some of the largest companies in North America, Europe and Asia on their most complex multijurisdictional tax issues. Mr. Farhat has extensive experience in resolving contentious and complex transfer pricing disputes, and during his career he has built significant relationships with tax authorities both in the U.S. and internationally.

Mr. Farhat worked at the IRS for nearly a decade and handled a variety of issues involving the Advance Pricing and Mutual Agreement (APMA) program. As an APMA team leader, he developed and negotiated bilateral and multilateral advance pricing agreements and mutual agreement procedures with several U.S. treaty partners, including the U.K., France, Japan, Canada and Switzerland. From his tenure at the IRS, Mr. Farhat also has extensive experience engaging with the agency's Large Business & International Exam and Chief Counsel divisions.

Prior to joining Skadden, Mr. Farhat was a partner at a major global accounting firm. In addition to resolving transfer pricing disputes in various jurisdictions outside the U.S., he provided international tax advice in treaty processes to resolve double taxation and tax jurisdiction disputes.

In recognition of his work, Mr. Farhat has been honored as one of Lawdragon's 500 Leading Global Tax Lawyers. In 2022, he was recognized as a finalist by *The American Lawyer* for its Best Mentor: Law Firm award. Mr. Farhat is the co-host of Skadden's "GILTI Conscience" podcast, which features discussions on pressing transfer pricing issues, international tax reform efforts and tax administration trends. This ongoing podcast series is available on all major podcast platforms.