

# Fred T. Goldberg, Jr.

Skadden

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Tax



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## Education

J.D., Yale University, 1973  
B.A., Yale University, 1969

## Bar Admissions

District of Columbia

## Government Service

Assistant Secretary for Tax Policy,  
Department of the Treasury (1992)

Commissioner, Internal Revenue  
Service (1989-1992)

Chief Counsel, Internal Revenue  
Service (1984-1986)

## Community Activities

Board Member, Children's National  
Medical Center; Chair of the Legal  
Affairs and Audit Committee

Board Member, Commonwealth

Former IRS commissioner and treasury assistant secretary for tax policy Fred Goldberg advises clients on a variety of complex tax administration matters and controversies. He also serves as co-chair of Skadden's global Pro Bono Committee and co-chair emeritus of Skadden's Diversity Committee. Mr. Goldberg first joined Skadden in 1986, following two years as chief counsel of the Internal Revenue Service. From 1989 until 1992, Mr. Goldberg served as commissioner of the IRS, and during 1992 he served as assistant secretary of the Treasury for Tax Policy. He returned to Skadden in December 1992.

Working with his tax department colleagues in Skadden's Washington, New York, Chicago, Los Angeles, Palo Alto and overseas offices, Mr. Goldberg's practice focuses on advising clients as special tax counsel on sensitive matters, and representing clients on tax controversies and IRS administrative and regulatory proceedings.

Mr. Goldberg advises clients as special counsel on a wide range of complex transactional and compliance matters. In addition to advising on novel tax administration issues, he has directed compliance and management reviews on behalf of senior executives and boards of directors of various companies. On a selective basis, Mr. Goldberg counsels clients on legislative matters. Mr. Goldberg has represented clients and groups of companies on issues of industry-wide significance in administrative proceedings before the IRS and the U.S. Department of Treasury, including on behalf of companies in the following industries: airline, automotive, banking, consumer products, health care, heavy manufacturing, insurance, investment, pharmaceutical, professional services, telecommunications and utilities.

Mr. Goldberg represents business, tax-exempt and individual clients during all phases of civil audits, administrative appeals and litigation. A primary focus of Mr. Goldberg's practice has been working with clients on innovative and high-stakes dispute resolution efforts in disputes with the IRS. Among the controversy matters he has worked on are tax accounting issues, transfer pricing, IRS challenges to R&E and energy tax credit claims, placed-in-service issues, IRS challenges to various capital market transactions, the status of tax-exempt bonds, the examination of tax-exempt organizations, the tax treatment of corporate distributions and reorganizations, the valuation of going concerns, international restructuring transactions, the tax treatment of insurance contracts, and compliance with information reporting and withholding rules.

Resident in Skadden's Washington office, Mr. Goldberg was a member of the National Commission on Restructuring the IRS, a member of the Center for Strategic and International Studies National Commission on Retirement Policy and executive director of the Bi-Partisan Congressional Commission on Entitlement and Tax Reform.

Mr. Goldberg repeatedly has been selected for inclusion in the top tier of *Chambers Global: The World's Leading Lawyers for Business*, *Chambers USA: America's Leading Lawyers for Business*, *The Best Lawyers in America*, *International Tax Review: Tax Controversy Leaders*, *Legal 500 U.S.* and *Who's Who Legal — Corporate Tax*. He also has been repeatedly included in *Washingtonian Magazine's* Top Lawyers list.