

# 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, New York City Kids  
RISE

Board Member, Build Commonwealth  
(f/k/a Doorways to Dreams (D2D))

Advisory Board, The Get Your Refund  
(GYR) initiative of Code for America

Fred Goldberg, former IRS chief counsel, IRS commissioner and Department of the Treasury assistant secretary for tax policy, advises clients on complex tax controversy and tax policy matters, including administrative, regulatory and legislative matters. He also serves as co-chair *emeritus* of the firm's *Pro Bono* Committee.

Mr. Goldberg represents business, tax-exempt and individual clients in all phases of a dispute resolution with tax authorities, including at audit, in administrative appeal, mediation and arbitration, and in litigation. A primary focus of his practice has been to resolve large and complex tax controversies related to a wide range of issues and across all industries. These matters have involved tax accounting; transfer pricing; IRS challenges to research and experimentation (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.

Clients have turned to Mr. Goldberg to advise on a variety of complex transactional and compliance matters having industry-wide significance. Additionally, he has directed compliance and management reviews on behalf of senior executives and boards of directors. On a selective basis, he also has counseled clients on several other regulatory and legislative matters.

Mr. Goldberg co-led Skadden's Global Tax Group for over 20 years. He also was a member of the National Commission on Restructuring the IRS and executive director of the Bipartisan Congressional Commission on Entitlement and Tax Reform.

Mr. Goldberg is very active in the firm's *pro bono* and diversity and inclusion efforts. He currently is co-chair of the tax working group committee of the Law Firm Anti-Racism Alliance, a coalition of more than 290 law firms around the country donating *pro bono* service to matters addressing racial justice issues. He is also involved in significant *pro bono* matters, including the HBCU-focused Student Freedom Initiative; the New York City Kids RISE education opportunity initiative; legislative options for reducing the tax gap; and design and implementation issues around proposals to extend the Advance Child Tax Credit.

A highly recognized practitioner in the area of tax controversy, Mr. Goldberg is repeatedly selected for inclusion in the top tier of *Chambers USA: America's Leading Lawyers for Business*, *The Best Lawyers in America*, *International Tax Review's World Tax and Tax Controversy Leaders* guides, *Who's Who Legal — Corporate Tax* and *The Legal 500 U.S.*, which named him to its Hall of Fame in 2022. He also was named to the *Washingtonian's* 2022 Top Lawyers Hall of Fame in recognition of being included in its Top Lawyers list at least 10 out of the past 15 years.