

## Peter Barnes Speaks to Law360 on IRS Audit Program for Large Companies

08.31.2018

*Law360*

Recently announced changes to the Internal Revenue Service's real-time audit program for large companies are likely to lead to speedier resolution of cases by kicking tougher, specialized issues to other divisions better equipped to handle them.

...

Peter Barnes, of counsel at Caplin & Drysdale, Chtd. and a professor of tax law at Duke University School of Law, agreed the program seems ill-equipped to deal with complicated issues - and questioned the agency's decision to devote significant resources to simpler ones.

"If the business is complex, then the manpower required by both the IRS and the taxpayer to engage in real-time auditing is enormous," he said. "For the IRS, I worry that CAP sucks up too many resources that are aimed at areas where the IRS actually faces less risk."

For the full article, please visit *Law360's* website (subscription required).

*Excerpt taken from the article "Punting on Tough Issues Likely to Speed Real-Time Audits" by Molly Moses for Law360.*

### **Attorneys**

Peter A. Barnes

### **Related Practices/Industries**

International Tax

Tax Disputes & Tax Litigation