

FACTORS EXPLAINING TAX COMPLIANCE

M^a Gabriela Lagos Rodríguez*



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Abstract

The aim of the article: The aim is to examine factors explaining tax compliance identified in the Economy to design an efficient tax compliance system. **Methodology:** In order to achieve the formulated aim, the paper provides an economic literature review on tax compliance related to the efforts of governments to encourage taxpayer compliance while minimizing the cost of a tax administration's activity. The paper presents a brief laying out the economics of tax evasion. Then, it focuses on critical summaries of what has been learned. **Results of the research:** The different factors identified indicate that tax compliance is a complex problem, with evident social costs and a significant impact on tax administration decisions. The tax compliance system minimizes the uncertainty and encourages the adoption of a series of voluntary mechanisms for cooperation between taxpayers and the tax administration.

Keywords: tax administration, tax compliance, taxpayer behavior, public decision-making, public economy, theoretical review.

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* Ph.D., Faculty of Economic and Business Sciences, University of Castilla-La Mancha, e-mail: gabriela.lagos@uclm.es
<https://orcid.org/0000-0002-2884-522X>

INTRODUCTION

In recent decades, the efforts of states and their member organizations against tax non-compliance have been a constant feature of public decision-making. Their objectives have been to improve taxation figures, encourage taxpayer compliance by both coercive and voluntary means, as well as to coordinate tax decisions at the international level. However, as the global data shows, the problem of the loss of resources through tax avoidance or evasion remains inadequately addressed¹.

Tax fraud is a reality that generates serious economic distortions. It alters the equity of the tax system, both horizontally – taxpayers with similar economic capacities bear different effective burdens – and vertically – insofar as the loss of utility derived from the payment of taxes from taxpayers with similar tax functions differs. It compromises the stability of the economic system due to the incorrect functioning of the automatic stabilizers of income – progressive taxation – and expenditure – transfers to households and companies and also prevents the public sector from developing a distributive function of adequate interpersonal income.

Two well-known phenomena are at the origin of this situation. On the one hand, it is the globalization of commercial operations, which involves different tax administrations in the taxation of the different taxable events that arise. On the other hand, we have the disparity in the tax qualification rules adopted by states to tax the above operations.

Recent economic crises have highlighted the need to correct the progressive loss of tax resources to safeguard both the fairness of the tax system and the sufficiency of public finances. Three factors primarily explain the current tax fraud problems: the low incidence of increased penalties associated with tax non-compliance due to taxpayers' ability to choose their tax sovereignty; the progressive reduction in the tax rates applied to productive factors, especially on capital; and the use of tax amnesties that exempt tax non-compliance penalties.

Because of economic globalization, taxpayers, whether individuals or companies, will have to settle the tax burdens generated in the different territories in which a tax liability has arisen. However, it is not always easy to determine which tax obligations must be complied with under which legislation, and this can lead to undesired non-compliance. The fact is that the differences in the rules of tax classification and the consequences for taxpayers have opened up a type of “global tax market”, in which the most competitive agents can choose tax sovereignty. This ability is reserved for those who are best adapted to the global environment, e.g., multinational groups operating in different states and which, above all, can relocate their permanent establishments or their headquarters according to their taxing interests.

¹ Revenue losses are estimated at over \$400 billion annually (Tax Justice Network 2020).

In the context of traditional commerce, with taxpayers located in the territory of a state, the problems of attribution of tax sovereignty were solved by applying the rules of taxation at the source or in the territory of residence of the taxable person. Without going into historical analysis, the pre-eminence of the taxpayer's state of residence as the active agent is well known. The residence criterion ensures taxation of the taxpayer's actual ability to pay, which taxes all their income, irrespective of where it is generated. Another argument in favor, and a decisive one, is that the countries of residence of large business corporations tended to be the most developed states, which, moreover, offered a legal environment of greater certainty and stability.

The digitalization of productive activity and the emergence of intangible elements that do not require the establishment of the parties involved in a transaction, a company can establish itself in a territory with lower taxation. However, a large part of their income is obtained from the citizens of territories with high taxation, which are usually those with a higher purchasing power.

From the taxpayer's perspective, the complexity of legal and economic relations has reached a point where the ability to specify and comply with tax obligations under conditions of certainty has become difficult. The causes of this situation are multiple and their presence, isolated or combined, determines a degree of difficulty in tax compliance. The situation is far from favorable for most taxpayers. Even for large transnational business groups, the tax requirements of the different states in which they operate, require significant investments in material and human resources, which adds to their management costs. The difficulty of following different, and sometimes conflicting, accounting and tax rules means that the possibilities of failing to comply with tax obligations are multiplied². This is true not only in the case of those directly linked to the payment of taxes but also for all the formal and reporting obligations that go with them.

In this context, the tax compliance proposal aims to be an efficient solution to the problems of legal uncertainty for taxpayers and revenue losses for the states. It is designed to be a tool to enable economic operators to prevent, identify and tackle behaviors that could generate administrative or criminal liability, thus constituting an instrument capable of resolving these *ex-ante* tax non-compliance problems. To do so, taxpayers must have the appropriate information to detect the risks they incur. It is clear, therefore, that the success of a compliance program requires the cooperation of the parties involved: administration, taxpayers, and tax advisors.

² As Pareja García (2018: 152–165) points out: “These obligations are particularly complex if we take into account the territoriality criterion that links tax criteria to a specific State, so that in those cases in which the company has a multinational activity it must make an extra effort to adapt its operations to comply with its tax obligations with respect to the different States in which it operates”.

Nowadays, public administrations are on the way to implementing tax compliance systems understanding that tax audits are not enough to avoid tax fraud. Due to that fact this article presents a review of the economic literature about the factors that explain tax compliance with the aim to highlight which of them are critical in an efficient tax compliance structure.

1. REVIEW OF THE ECONOMIC LITERATURE ON TAX COMPLIANCE

Economic science has analyzed tax non-compliance under the premise that the decisions of all the agents involved are taken under conditions of uncertainty. The presence of incomplete and asymmetric information determines the possibilities of action of the two parties who, abstracting from ethical and moral values, will attempt to maximize their respective gains. The problem is posed as a zero-sum game in which one party gains what the other loses, even if the overall welfare losses are added to what the public sector strictly forgoes in revenue. The starting point of economic analyses of tax compliance has traditionally been the bilateral relationship between taxpayers and administration. The taxpayer knows their real economic capacity, but the administration does not, and, in contrast, the taxpayer lacks precise knowledge of the inspection decisions and the means available to the public treasury.

The first doctrinal analysis in this area was that of Allingham and Sandmo (1972: 323–338). These authors analyze income tax fraud and conclude that a taxpayer's decision to defraud will be determined both by the tax savings they can obtain and the probability of being detected and penalized. The benefit of fraud will depend on the marginal tax rates, which grow higher as the rate rises³, and the costs will be those arising from the penalty imposed and the taxpayer's ability to conceal their income, which may involve commissioning specialized third parties. The response to this phenomenon will be either to reduce the tax benefit – by lowering tax rates – or to increase its cost – mainly by increasing penalties.

An alternative might be the establishment of a proportional tax system, in which taxpayers are taxed at the same rate, whatever their income. For different reasons⁴, Heinemann and Kocher (2013: 225–246) show that the tendency to tax non-compliance is higher in a proportional than in a progressive tax system.

Allingham and Sandmo's model approaches taxpayer behavior as a portfolio selection problem: it predicts taxpayers' fraudulent behavior depending on whether they choose a risk-free asset – paying their taxes – or a risky one – not

³ A sample of this correlation can be found in Dahmi and Al-Nowaihi (2007: 171–192).

⁴ One explanation for this result is that there is a reaction to the perceived unfairness of a flat tax system (Spicer and Becker, 1980: 171–175).

reporting all the income due. The criticism of this model is that it is unable to predict the compliance or non-compliance behavior of agents with higher taxpaying capacities. This is the case of higher-income taxpayers with decreasing risk aversion, i.e., those liable for more tax show a higher degree of tax compliance because the penalty imposed would be higher, but, at the same time, they may be those who defraud more because the tax rate applied to them is higher than the rate applied to the rest (see Hashimzade, Myles and Tran-Nam, 2013: 941–977; Bernasconi, Corazzini and Seri, 2014: 103–118).

Yitzhaki (1974: 201–202) proposes a variant that solves the above problem. His contribution is to make the penalty proportional to the tax evaded and not to the undeclared income. Adjusting the penalty to the amount of tax non-compliance encourages correct tax behavior by high-income taxpayers, who will seek to avoid significant penalties. Yitzhaki's contribution is, however, contradicted by most of the empirical studies that have attempted to test his hypothesis⁵.

The complexity of taxpayer behavior makes it difficult to design appropriate public policies to encourage tax compliance. For this reason, other proposals such as the Prospect Theory (Kahneman and Tversky, 1979: 263–292; 1992: 297–323) have arisen, which evaluate the losses and gains of tax compliance concerning a reference point, and not in an absolute manner, as in the previous model. In essence, this involves moving beyond the utility function, implying that an individual will prefer to avoid losses – penalties – rather than obtain equivalent monetary gains – unpaid taxes. To formalize the application of this theory in the tax sphere, Yaniv (1999: 753–764) considers the use of withholding taxes as a mechanism for correcting tax fraud and shows that their effectiveness is related to the amount that is set, such that if the withholding tax is very high, its effectiveness as an instrument for encouraging tax compliance is reduced.

Some authors introduce into the analysis the perceived probability of an inspection as another explanatory element. Schmidt (2001: 157–172) shows that individuals tend to overestimate the probability of being subject to a tax audit, which encourages voluntary tax⁶ compliance. Some studies show that the degree of compliance of a taxpayer who has already experienced a tax audit is higher because they estimate the probability of being audited again to be higher (Spicer and Hero, 1985: 263–267). However, other contributions corroborate what has been called the “bomb-crater-effect” (Mittone, 2006: 813–835) that is, designating the inspected taxpayer's perception of the drastic reduction of the chances of immediate re-inspection. In these cases, the opposite phenomenon occurs, i.e., the degree of non-

⁵ It is not the purpose of this paper to go into the empirical evidence on the relationship between income level and tax compliance. However, most studies carried out contradict Yitzhaki's hypothesis. See Boylan and Sprinkle (2001: 75–90).

⁶ Alm, McClland and Schulze (1992: 21–38) already anticipated the possibility of this over-dimensioning of the potential tax audit as a factor to be considered.

compliance increases, partly in response to this “crater effect” and partly as a “reparation mechanism” that allows them to compensate for the loss caused by the payment of taxes and the penalty imposed (Panadés i Martí, 2017: 86–111).

The influence of tax audits on taxpayer behavior varies depending on whether they are random or selective (Malézieux, 2018: 107–127). Thus, if a taxpayer considers they have the same chance of being audited as another taxpayer, the deterrent effect of tax non-compliance is lower than if the possibility exists of their being strategically audited in consequence of an analysis of their tax risk profile. Therefore, the application of endogenous or strategic rules in tax audits improves their efficiency as incentives to comply with tax obligations⁷.

In this specific field, and taking Game Theory as a theoretical reference, an attempt has been made to establish the taxpayer/administration relationship under the principal/agent approach. Considering the tax administration as the “principal” of the legal-tax relationship, it proposes to a taxpayer – “agent” – a contract with a compliance commitment about the inspection objectives to be developed. Once the administration’s tax review policy is known, taxpayers will be able to estimate the probability of being inspected and adjust their degree of tax non-compliance, which will be lower than if it is not known. The problem arises *a posteriori* for the tax authorities themselves since their inspection activity will be more efficient if it is devoted to areas other than those they have announced. Moreover, to the extent that the inspection guidelines are not binding on the administration, the taxpayer always faces the probability of being inspected in areas other than those set-out and the assumption of losses for complying in the areas identified by the tax authorities⁸.

Alm, McKee and Beck (1990: 23–37), Torgler and Schaltegger (2005: 403–431) and Rechberger et al. (2010: 214–225) analyze the impact of tax amnesties. A tax amnesty is understood as a legal opportunity that allows a tax evader to repay their debt without bearing the penalties associated with their behavior. The work of the authors above shows that a tax amnesty has a positive effect on tax compliance. However, the effect is *a posteriori*, i.e., if the taxpayer has no prior expectation of a possible amnesty. Otherwise, it acts as an incentive to tax non-compliance in the expectation of not being inspected or, if in the worst-case scenario non-compliance is identified, not assuming the corresponding penalty. Not generating expectations about future amnesties is therefore essential for tax administrations to be able to obtain positive results from their application. A different issue, and no less important, is the legal effect of unfair treatment of compliant taxpayers. For one reason or the other, the use of tax amnesty should be limited and exceptional.

⁷ An example might be membership of a particular group of taxpayers or the individual’s own tax history.

⁸ For more information on this issue, see Caballé and Panadés (2003: 239–263) and Bayer (2006: 1071–1104).

Kirchler et al. (2009: 488–507) test the hypothesis that if the taxable income has been obtained with great effort, the taxpayer is willing to take a higher risk, i.e., that their acceptance of fraudulent behavior related to this income is higher. Consequently, the tax administration should make a greater effort to inspect income derived from capital, where less effort in obtaining such a tax may generate a higher propensity for fraud than that for income derived from labor. The costs of increased enforcement are administrative and excess tax burden, but also “the extra uncertainty to taxpayers that de »tax audit lottery« creates” (Slemrod, 2020: 76). Although the results of their research are not conclusive, it can be deduced that the burden of effort in obtaining the taxable income or wealth is not a determining factor in the decision of tax non-compliance. On the contrary, the authors find a direct relationship between effort and the taxpayer’s level of aspiration, which they define as “the individual’s expectancy for financial compensation for the prior effort”. In sum, an individual’s expectations about tax behavior derived from the values they hold are determinants of tax evasion behavior. This evidence reinforces the consideration of psychological and social factors in the analysis of tax non-compliance.

As additional factors, research on tax compliance in the economic sphere has also pointed to the influence of the complexity of the tax system and the impact of the nature of the taxpayer’s productive activities. To put briefly, and despite what might *a priori* be inferred, the excessive complexity of the tax system is a clear inducer of tax non-compliance. Taxpayers’ perception of a confusing tax framework is that there are opportunities to avoid its application. Simplicity and transparency of tax rules, in contrast, favor compliance⁹.

Regarding the economic activity carried out by the taxpayer, studies have reported a coherent behavior between tax non-compliance and risk tolerance. In other words, taxpayers engaged in riskier productive activities – such as entrepreneurs and the self-employed – are more tolerant of potential loss due to tax non-compliance¹⁰. These findings are directly applicable in defining the criteria for targeted tax audits.

Finally, in this brief review of theories on taxpayer behavior towards tax obligations, it is necessary to reference a group of studies analyzing the impact of an individual’s moral values. In this area, the initial premise is that the observed degree of tax compliance is higher than that inferred from the aforementioned

⁹ It is worth highlighting the work by Gangl et al. (2013: 487–510) on a sample of taxpayers in the Netherlands, in which a positive correlation is found between the tax advice service the administration made available to taxpayers and the degree of tax compliance.

¹⁰ Works complete the analysis by adding the perspective of tax evasion opportunities available to the taxpayer (Hashimzade et al., 2014: 134–146 and Doerrenberg and Duncan, 2014: 48–70). They conclude that tax compliance is higher in activities that do not provide options for tax evasion – for example, personal work – and that it increases in those that do – business activities.

theoretical models. Individuals, therefore, tend to be honest and pay their taxes, which allows us to consider psychological and moral elements that alter the expected result. The literature offers two explanations in this regard. On the one hand, the psychological cost of non-compliance increases as non-compliance increases, which leads individuals to reject such behavior (Gordon: 1980: 797–805). On the other hand, there is a social cost linked to the loss of reputation of the taxpayer who defrauds. As we shall see, this latter approach is a determining factor in the planning of administrations' actions to promote tax compliance in commercial companies.

In any event, each analysis provides information on a complex problem, with evident social costs and a significant impact on the non-compliant taxpayer detected by tax administrations.¹¹ Economic science aims to attempt to encourage correct tax behavior by taxpayers while minimizing the cost of a tax administration's activity. Under the law, as discussed below, all this must be done with the necessary respect for the rights of individuals.

2. CONCLUSIONS ABOUT OPTIMAL TAX COMPLIANCE SYSTEM CONFIGURATION

Cooperation in tax matters can be analyzed based on an idyllic conception of the relations between the taxpayer and the tax administrations or under the observation of the evolution of the phenomenon of tax fraud in a global and digitalized economy. In my opinion, it is only from the perspective of the advantages that both parties obtain in reaching a tax agreement that it is possible to examine its regulatory implementation and predict its chances of success. A tax compliance system is, in this sense, a preventive mechanism for tax non-compliance in which the two parties involved – the tax administration and the taxpayers – stand to gain.

The principle of cooperation is projected onto taxpayers' compliance with their tax obligations, specifically in the adoption of a series of voluntary mechanisms for cooperation with the administration. The alternative requires assuming increasingly higher fiscal and reputational risks, both in terms of the number of penalties applied and the speed and extent of knowledge and social reprobation of tax evasion behavior. For administrations, not considering the implementation of cooperation mechanisms with the taxpayer will require them to make a considerable effort to combat fraudulent conduct and international coordination that is not always feasible.

In addition to the effects of the application of voluntary tax compliance systems on the revenue obtained, it has been noted that the consequences of their

¹¹ For a current and comprehensive review of the explanatory factors of evasion behaviour, see Alm and Malézieux (2021: 669–750).

implementation go beyond the tax sphere to fall within the scope of Organizational Social Responsibility. In this sense, tax compliance is an instrument that allows reputational value to intervene in taxpayers' decision-making, moderating the weight of the potential economic gains derived from tax non-compliance. Tax compliance becomes a further element in business decision-making and its protection is embodied in the economic and organizational practices of the business structure itself.

As basic elements of tax compliance systems, it is worth highlighting that they reduce the legal uncertainty with which taxpayers and administrations operate. The certainty about the tax risks detected and the measures to be adopted to neutralize them entails significant cost savings for both parties and, therefore, greater efficiency in the economic activity of taxpayers and the collection and inspection activity of the public finances.

Different proposals put forward by states and international organizations lead to the conclusion that a tax compliance system must include certain characteristics that allow it to be useful and successful. Thus, a tax compliance program must be flexible and able to adapt to the dynamic circumstances of the market. It cannot be an obstacle or an added risk to economic activity, especially in conditions of high competition in a digital and global environment. The administration's response to taxpayers' queries must be quick and tailored to taxpayers' needs. This condition is essential to facilitate responsible tax decision-making, especially for large transnational business groups whose reputation is essential for the development of their activity in different countries.

To achieve the above objective, the taxpayer/administration relationship needs to be one of mutual trust and respect for basic principles – such as those set out in the European Taxpayer's Code (European Commission, 2016) – including transparency about the intention of tax rules and procedures or the presumption of honesty.

In short, there must be a change in the paradigm of relations between public finances and taxpayers, which is the basic condition for the success of tax compliance programs.

Although today's environment is digital and global, the premise of uncertainty in decision-making has not changed; on the contrary, it has become more intense. The higher the risk, the greater the chances of making a profit or suffering heavy losses. For this reason, taxpayers and administrations seek to mitigate the effect of uncertainty by creating trusting environments in which tax relationships can develop.

In a world in which the value of information is increasing, voluntary tax compliance systems mean that tax administrations can achieve levels of knowledge of the taxpayers' financial risks that extend to transactions and individuals with whom this system has not been agreed. This implies, in line with

theoretical forecasts, that inspection activities on economic agents who do not adhere to these processes will be more selective and efficient.

In this context, a tax compliance program is a tool that allows economic operators to prevent, identify and tackle behaviors, and that could generate administrative or criminal liability. However, to be an efficient solution to solve the problems of legal uncertainty for taxpayers and revenue losses for states, the tax system must comply with the principles of justice, simplicity and legal certainty, and respect for the rights of citizens/taxpayers. If the taxes faced by taxpayers are too complex, if the tax burden is perceived as excessive – and therefore unfair – if the administration does not ensure fair and respectful treatment, and, finally, if right tax governance is not guaranteed, resistance to tax compliance will be so strong that voluntary compliance systems will not be effective in the fight against tax fraud.

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