Revealing 21% of GDP in Hidden Assets: Evidence from Argentina

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Motivation

- ▶ Offshore evasion remains an important challenge for tax policy (Slemrod'19; Zucman'15)
- Policy activity has been prolific...
 - **Tax amnesties** in 50+ countries (OECD, 2015)
 - Enforcement initiatives (e.g., CRS, FATCA, TIEAs)
- ▶ Understanding the *circumstances* under which these tools succeed/fail is crucial
- ▶ But it has been hard to draw lessons from countries' varying experiences (e.g., ≠ baseline evasion rates, amnesties' design and contextual features, data limitations)

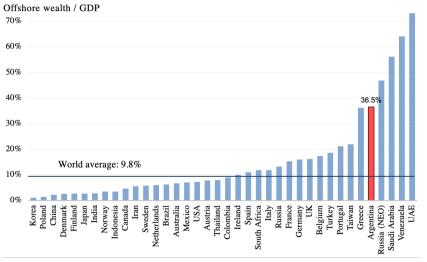
This paper

▶ We study Argentina's recent experience with offshore tax enforcement initiatives

Argentina is particularly well-suited to examine these issues

- 1. There is a lot at stake: 1/3 of GDP had been stored offshore
- 2. Argentines report assets annually because there is a gross wealth tax
- Rich policy variation: amnesties in 2009, 2013–2015, 2016, with varied effectiveness: disclosed assets ranged from 0.5% to 21% of GDP —world's most successful amnesty?

Argentina owned the equivalent of 36.5% of GDP in offshore wealth



Source: Alstadsæter, Johannesen, and Zucman (2018)

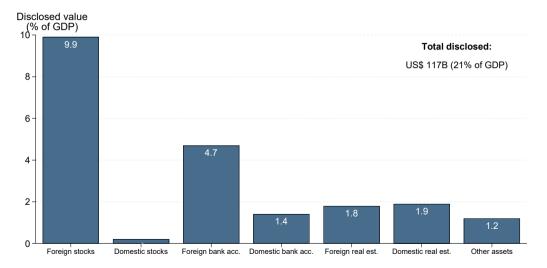
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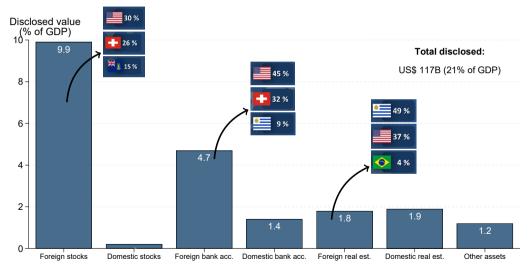
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Disclosed assets made under the 2016 amnesty by 255k participants 80% hidden abroad (mostly financial); raised 1.8% of GDP from a one-time tax •



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This paper

- The extensive scale of asset disclosures provides an opportunity to utilize straightforward methods to unpack the effects of changes in tax enforcement
- By employing two decades of detailed tax tabulations + Pareto interpolations we shed light on
 - 1. the prevalence, nature, and distribution of tax evasion
 - 2. the effects of improved compliance on tax revenue
 - 3. the degree of progressiveness within the tax system

We discuss several factors that may have contributed to 2016 amnesty's success

Contributions

- Offshore evasion and fiscal implications Alstadsæter et al. (2019), Zucman (2015)
- Voluntary disclosure programs
 Alstadsæter et al. (2019, 2022), Johannesen et al. (2020), Langenmayr (2017), Leenders et al. (2023),
 Londoño-Vélez and Ávila-Mahecha (2021)
 - \rightarrow Argentina offers the world's largest natural experiment with tax amnesties
 - \rightarrow Enables to shed light on the factors contributing to better offshore tax enforcement

 \rightarrow We show that large disclosures of offshore assets can take place, even in a developing country with a lot at stake and a history of failed amnesty programs

Outline

Revealing Foreign and Domestic Assets

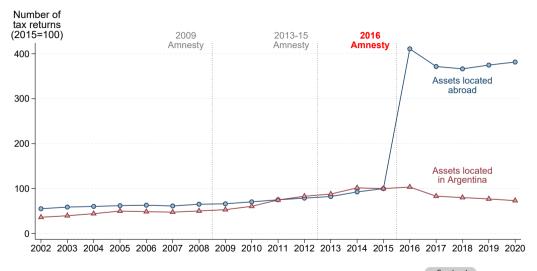
Disclosures by Top Wealth Groups

Expanding the Wealth and Capital Income Tax Bases

Do Taxpayers Repatriate Assets in Response to Tax Incentives?

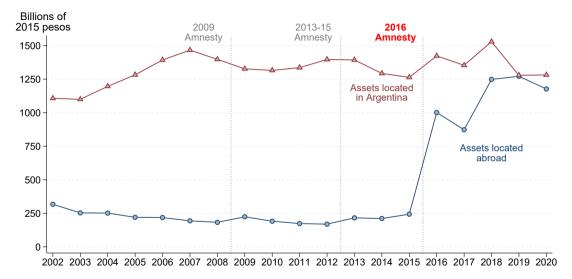
What made the 2016 amnesty different?

A 310% increase in the number of wealth taxpayers declaring foreign assets



Notes: There are 28,816 returns for foreign assets and 1,241,683 for domestic assets at baseline (2015). • See levels

Argentines now report that half of their assets are located abroad .



Outline

Revealing Foreign and Domestic Assets

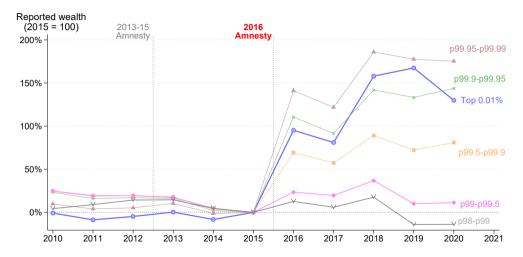
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What made the 2016 amnesty different?

The disclosures expanded the amount of wealth reported by the top 0.1% Individuals report to own 2x-3x as many assets as before the scheme



Outline

Revealing Foreign and Domestic Assets

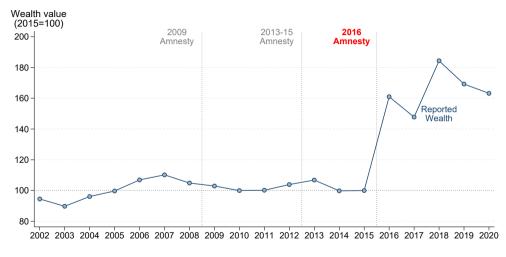
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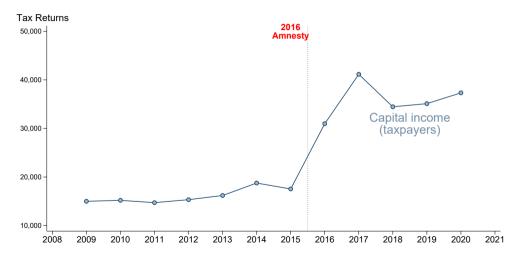
What made the 2016 amnesty different?

The massive disclosures expanded Argentina's wealth tax base As a result, wealth tax revenue has doubled since 2016 • Revenue

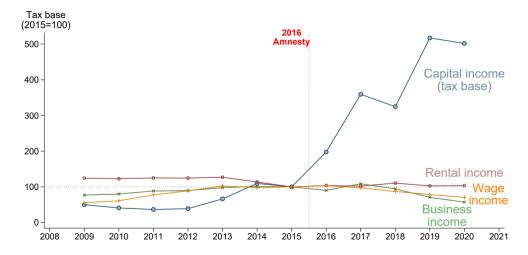


Levels
 Fax base

Assets disclosures contributed to more capital income reported N of taxpayers reporting capital income doubled All sources



Assets disclosures contributed to more capital income reported Capital income tax base tripled—and the increase persisted • Levels • Shares



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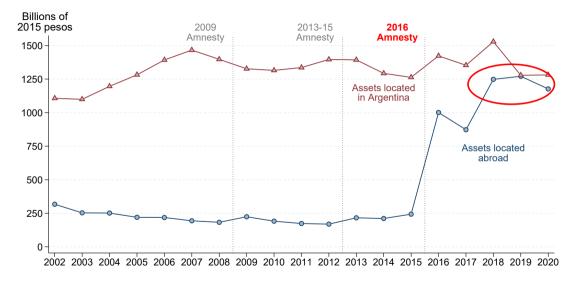
Limited response to sizable tax incentives for repatriation

Most Argentines kept their assets abroad, despite sizable tax incentives:

- 1. Repatriation clauses embedded in the amnesty to bring capital back into the country \rightarrow Waive penalty by investing 1/3rd of disclosed asset in special Treasury bonds
- 2. New adm imposed higher ("confiscatory") tax rates on foreign assets in 2019 \rightarrow Raised top wealth tax rate from 0.25% to 2.25%

Suggests that taxation is not the primary motive to hold assets abroad → Might be to insure against economic volatility, currency controls, ER fluctuations, inflation spells, and to obtain higher returns

Little change in declared foreign assets in 2018–2020 • ETR • Rev-GDP



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Revealing Foreign and Domestic Assets

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Do Taxpayers Repatriate Assets in Response to Tax Incentives?

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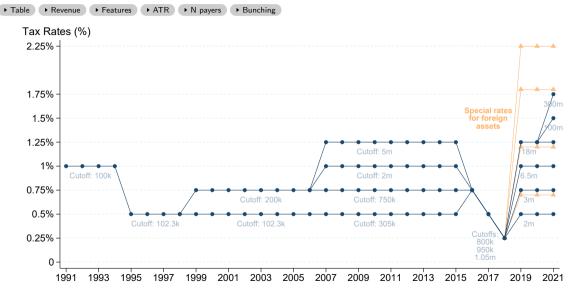
Features of Macri's 2016 tax amnesty

- 1. **Scope:** all (foreign and domestic) assets and currencies as of July 22, 2016. In place for nine months (Aug '16–March '17)
- 2. Tax and non-tax benefits: forgave tax liabilities & fines + no criminal prosecution Pre-amnesty, penalty for evasion was 2-10X taxes evaded + imprisonment
- 3. **Costs:** a one-time penalty of 10% on assets worth >50k dollars (5% for real estate, 0% for assets worth <19k dollars)
 - To encourage early participation, top rate jumped to 15% after Dec 31, 2016 •
 - Participants could waive penalty by investing 1/3rd of disclosed asset in special Treasury bonds or domestic mutual funds for five years

What made the 2016 amnesty different? Four essential features •

- 1. Rewarded compliant taxpayers to safe keep tax morale but slashed wealth tax to entice participation
 - Non-participants who filed wealth tax in 2014 and 2015: 0% wealth tax in 2016–18
 - Participants: wealth tax rate dropped from 1.25% in 2015 to 0.25% in 2018
 - Talks about repealing wealth tax in 2019
- 2. Threat of detection became more credible
 - TIEAs with most relevant tax havens (Uruguay, Switzerland), Brazil, Chile, USA
 - Panama Papers leak two months prior
- 3. A favorable political economy with a pro-market and business-friendly gov't + earmarking revenue to fund public pension system (garnering taxpayer support)
- 4. Massive ad campaign made program salient + simple disclosure process

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TIEAs made the threat of detection more credible

Note: can explain some, but not all, of the disclosures: (i) CRS not fully operational until 2018; (ii) 3.3% of GDP disclosed in *domestic* assets, including 110,000 properties

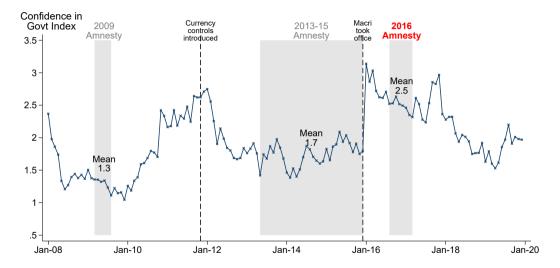


Source: Slide taken from AFIP's communication campaign.

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Citizens' trust in the government (from 0 to 5)



An ad promoting amnesty to contribute to better pension benefits for older citizens \hdots



The ad translates to:

Tax Amnesty Declaration of assets

Report your assets, contribute to your country, we achieve better pensions. We all grow

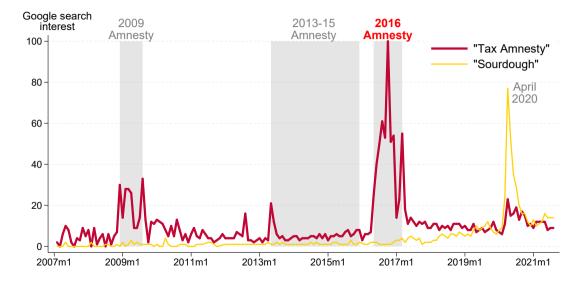
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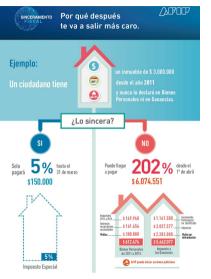
Visibility: amnesty banners at the entrance of IRS's headquarters



Google search trends show amnesty program was salient



An ad describing tax evaders' penalty trade-off



"Why you'll pay dearly for it later"

Example: a person with a non-declared property worth 3m pesos

Left: A 5% penalty (150k pesos) if evader discloses it before March 31

Right: A potential 202% penalty (6m pesos) + potential criminal prosecution starting April 1 $\,$

Source: AFIP's webpage.

Simple disclosure process Screenshot of AFIP's main webpage



Translation:

Tax Amnesty (Sinceramiento Fiscal) "HOW TO DISCLOSE ASSETS"

"Access this video-tutorial for a step-by-step guide to report your undeclared assets and enjoy the benefits"

Bottom right: countdown to the deadline

Final remarks

We show that large disclosures of offshore assets can take place, even in a developing country with a lot at stake and a history of failed amnesties

Will our results replicate in other countries or even a future Argentina?

Admittedly, Argentina has some unique features. However, its varied experiences with tax amnesties can offer valuable lessons for other countries:

 \rightarrow Well-designed tax incentives, strong confidence in the incumbent government, substantial ad campaigns, and a credible threat of detection can matter for amnesty programs to succeed

Thanks!

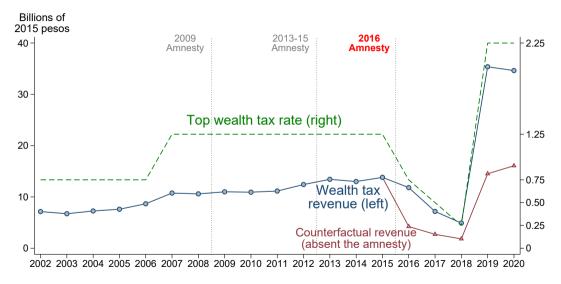
Dario Tortarolo dtortarolo@worldbank.org

Summary of main results

- 1. Despite substantial offshore tax evasion, # of people declaring foreign assets tripled in 2016 and declared foreign assets quadrupled
- 2. Disclosures were extensive among top 0.1% who hold most of their assets offshore
 - Enabled a new adm in 2019 to raise revenue/ETR by levying higher taxes on foreign assets
- 3. Improving tax compliance has sizable externalities on capital taxes and social transfers
 - Wealth and capital income tax bases more than doubled even four years later
 - Earmarked revenue boosted pension benefits by 15%
- 4. Limited repatriation response to amnesties and "confiscatory" taxes on foreign assets \rightarrow Taxation is not the primary motive to hold assets abroad

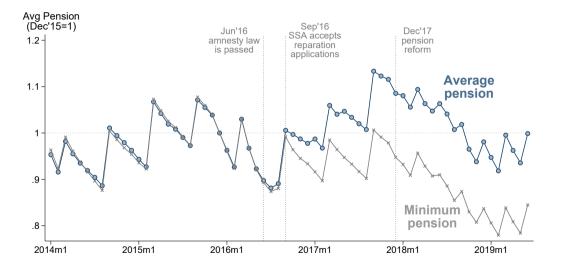
Appendix

As a result, wealth tax revenue doubled—and tripled when tax rate \uparrow

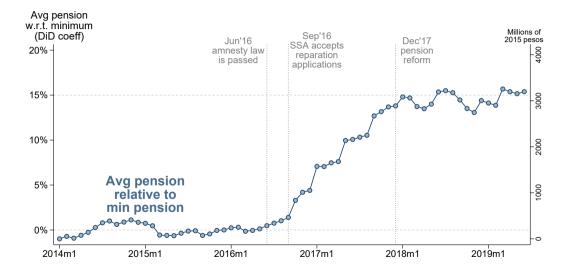


Schedule
 Schedule
 GDP
 ATR
 Good Compliers
 WT base

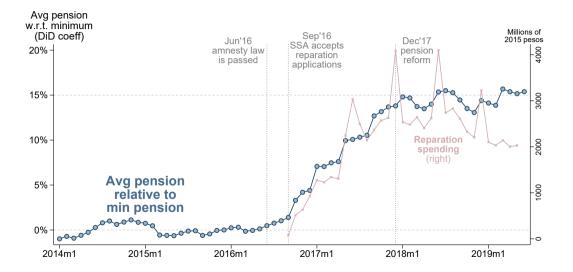
By earmarking revenue, the amnesty raised pension benefits by 15% \bullet Back



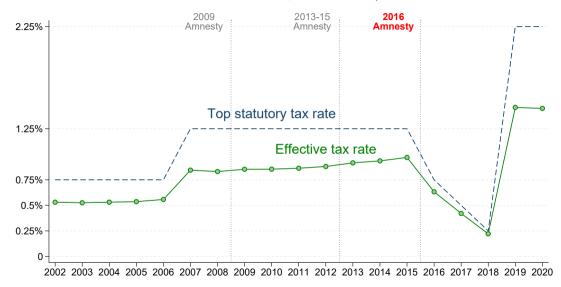
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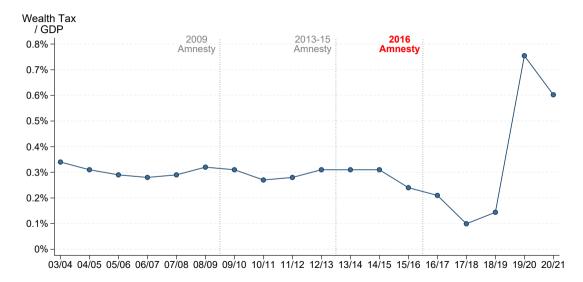
By earmarking revenue, the amnesty raised pension benefits by 15% \bullet Back



And effective tax rate remains unchanged in 2019/20 •Back



As a result, big spike in wealth tax revenue to GDP ratio in 2019 • Back



Wealth Tax Form 762/A • Back

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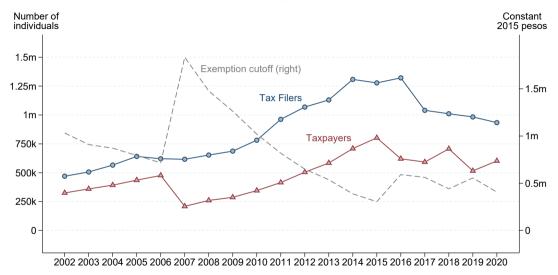
Declaro que los datos consignados en este formulario son correctos y completos y que he confeccionado la presente utilizando el programa aplicative (offware) entregado y aprobado por la AFIP, sin omitir ni falsear dato alguno que deba contener, siendo fiel expresion de la verdad.

Tax Rates and Wealth Tax Thresholds: 1991-2020

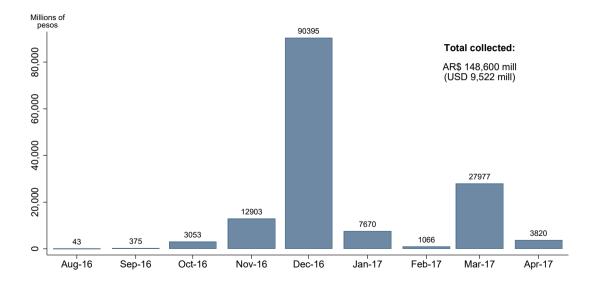
Fiscal Years	Exemption Threshold	Bracket 1	Bracket 2	Bracket 3	Bracket 4
1991-1994	100k/102.3k		1	%	
1995-1998	102.3k		0.	5%	
1999-2006	102.3k	0.5% 7	90X	0.75%	
2007-2015 (notches)	305k	0.5% 1	0.75% ₂	n 1%	1.25%
2016	800k		0.7	75%	
2017	950k		0.5	50%	
2018	1.05m		0.2	25%	
2019-2020 domestic assets 2019-2020 foreign assets	2m 2m	0.5% 0.7% ³	0.75% 1.20%	5 ^m 1% 1.80%	1.25% 2.25%

Notes: Thresholds (in current pesos) are reported in blue. For 2007-2015 the thresholds operated as notches. Back Filing thresholds (earnings): 2007-2014: \$96k; 2015: \$200k; 2016: \$500k; 2017: \$1m; 2018: \$1.5m; 2019: \$2m; 2020: \$2.5m.

Wealth Tax Filers and Wealth Tax Payers .

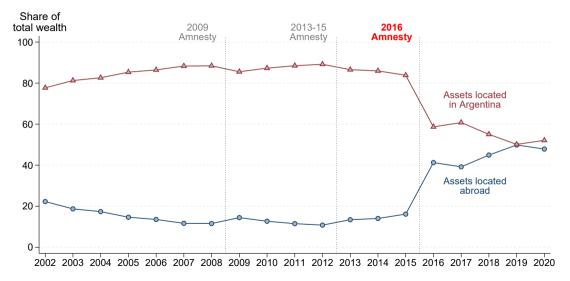


Revenue from the 2016 Amnesty's Special Tax • Back • Disclosures

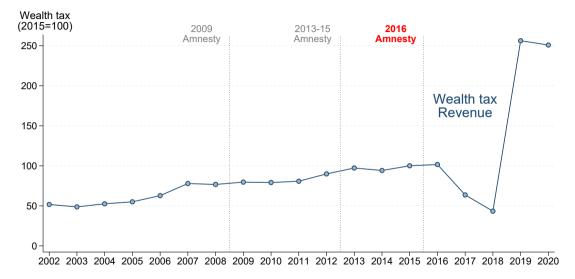


Foreign vs Domestic Assets

Share of total wealth Back

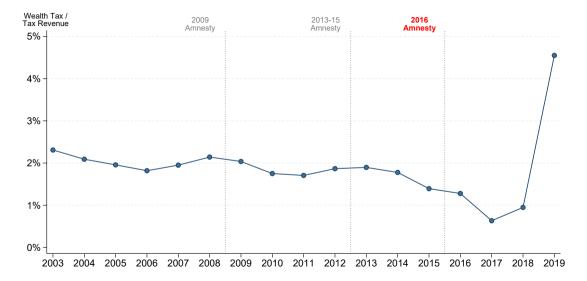


Wealth Tax Revenue

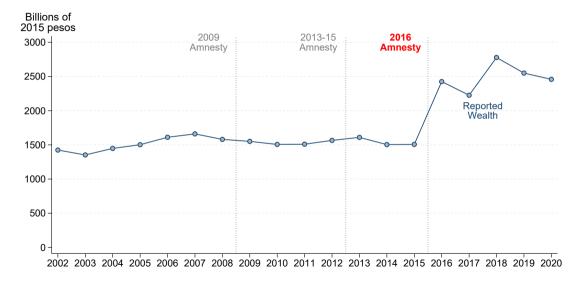


A 256% increase in wealth tax revenue!

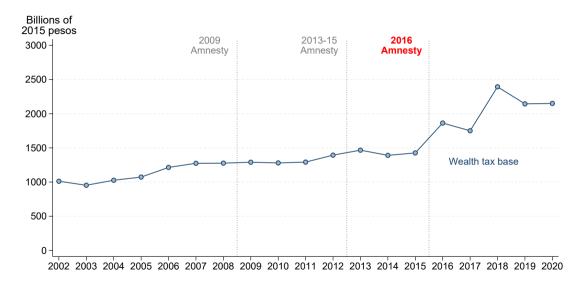
Wealth Tax / Tax Revenue (%)



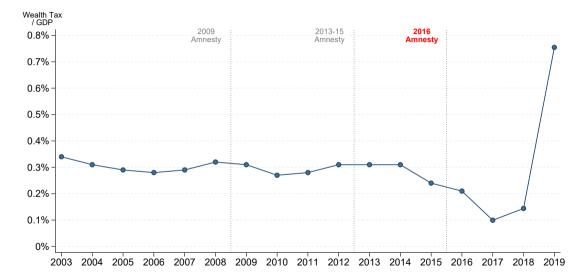
Reported Wealth (levels) • Back



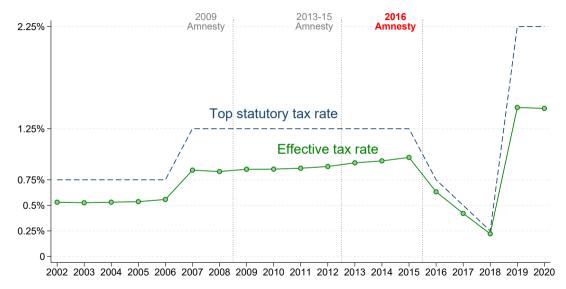
Wealth Tax Base • Back



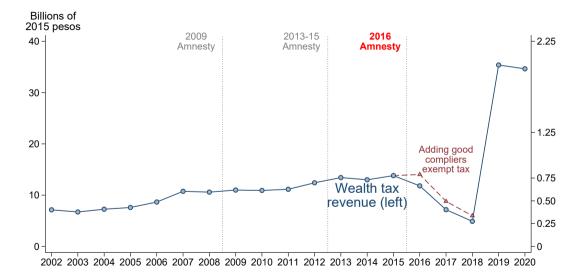
Wealth Tax / GDP (%) • Back



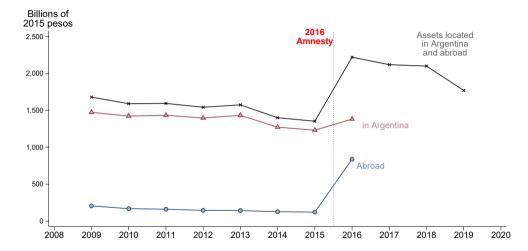
Effective Tax Rate • Back



Revenue with and without "Good Compliers" • Back

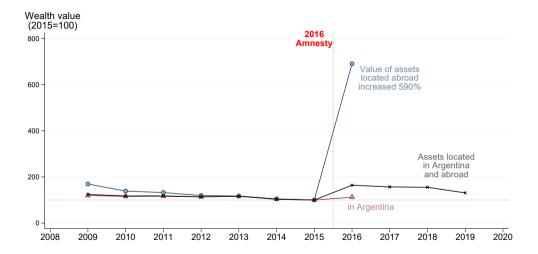


Wealth reported in income tax returns



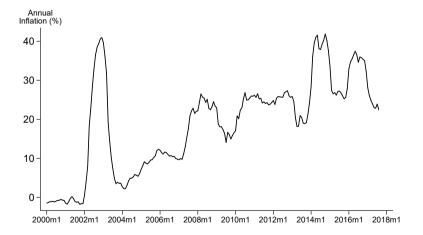
Robustness: Reassuringly, people also report more assets abroad in their income tax returns.

Wealth reported in income tax returns • zoom in

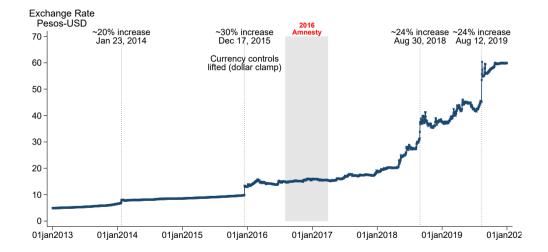


Robustness: Reassuringly, people also report more assets abroad in their income tax returns.

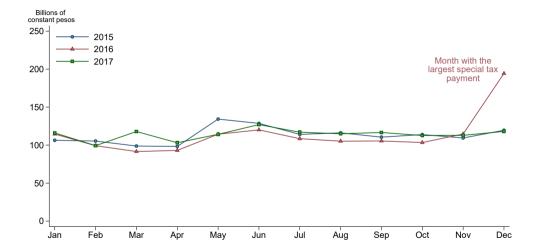
Annual inflation [2000-2017]



Exchange Rate Pesos-US Dollar • Back



Total Tax Revenue



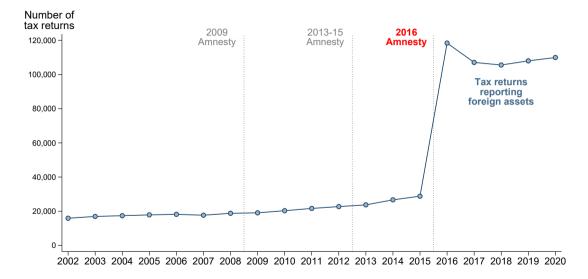
Tax Revenue collected in December 2016 almost doubles due to amnesty's special tax

Details of disclosed assets

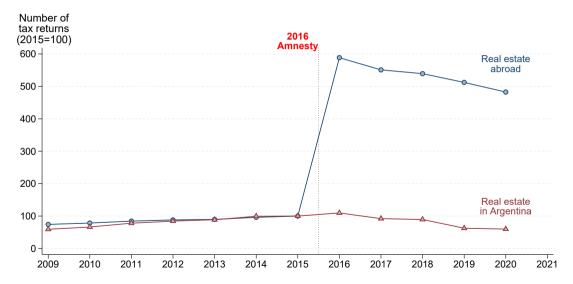
Type of Asset	Value (in mill USD)	%	
Investments - Abroad	54,999	47	
Investments - in Argentina	860	1	
Cash deposits - Abroad	25,925	22	
Cash deposits - in Argentina	405	0	
National/foreign currency - in Argentina	7,344	6	
Real Estate - Abroad	10,124	9	
Real Estate - in Argentina	10,434	9	
Rest of Assets	6,685	6	
Total	116,775	10	
% of GDP	21%		

Notes: Investments abroad: 30% located in the US, 26% in Switzerland, 15% in the UK; Cash deposits abroad: 45% located in the US, 32% in Switzerland, 9% in Uruguay; Real estate abroad: 49% located in Uruguay, 37% in the US, 4% in Brazil. Rest of assets: cars, boats, airplanes, art, jewelry, etc.

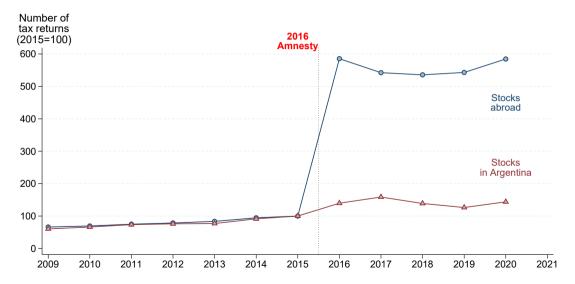
Tax returns reporting foreign assets • Back



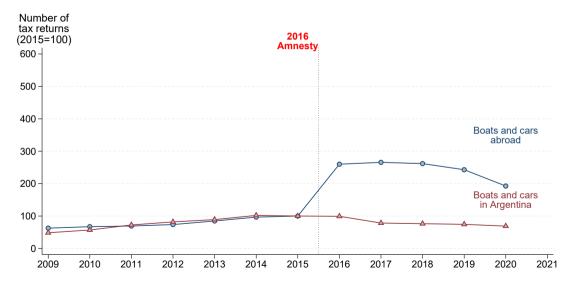
Real Estate • Back



Stocks Back



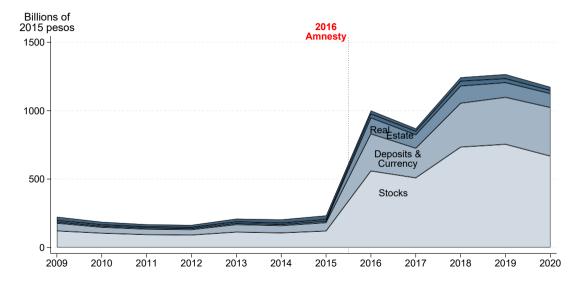
Vehicles Back



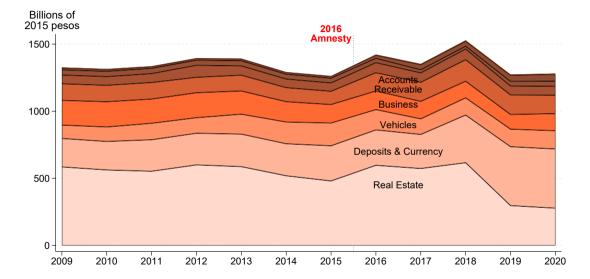
Bank deposits and currency • Back



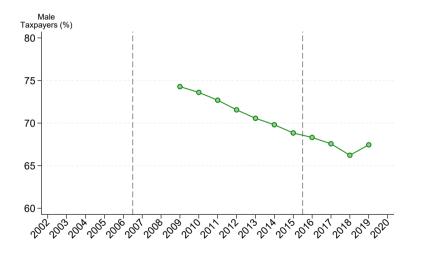
Massive disclosures of foreign stocks, cash, and real estate • Back



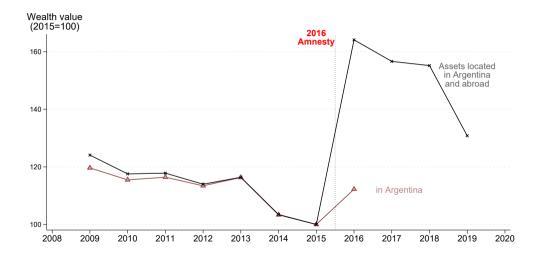
Domestic real estate and cash also increase (but smaller in %) \bullet



Share of Male Wealth Tax Payers

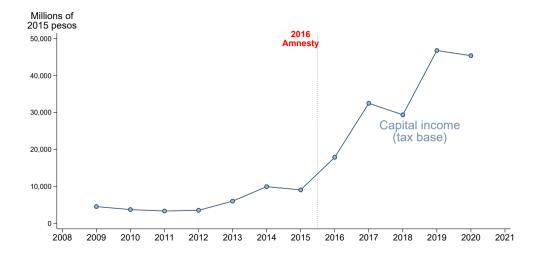


Wealth reported in income tax returns • Back



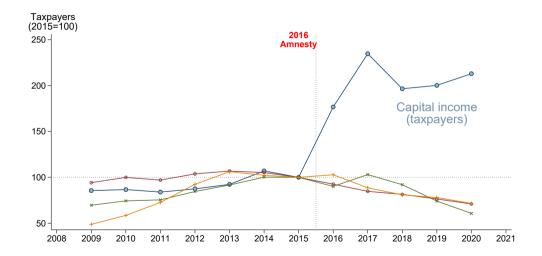
Fiscal Externalities into the Income Tax

Capital Income: Tax base • Back



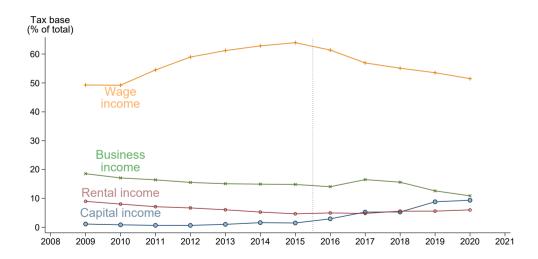
Fiscal Externalities into the Income Tax

Capital Income: Taxpayers • Back



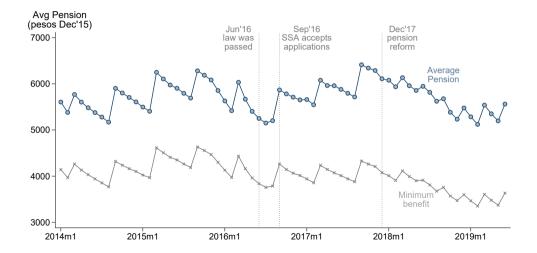
Fiscal Externalities into the Income Tax

Capital Income: Share of total tax base • Back



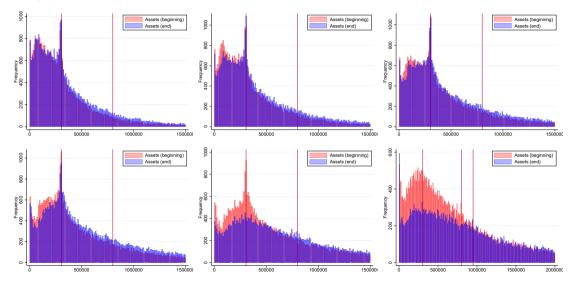
Fiscal Externalities into Pensions

Average pensions
Back



Distribution of wealth (assets)

Bunching at the exemption cutoff • Back



Advertisement of earmarked revenue Back



Source: AFIP's webpage.

Translation:

Tax Amnesty

Declaration of assets

Report your assets, contribute to your country. **We achieve better pensions**. We all grow.

What makes for a successful tax amnesty? A roadmap

The tax incentives

The threat of detection

► A favorable political economy

High salience and low compliance costs

What made the 2016 amnesty successful at disclosing hidden assets?

	2009	2013-2015	2016
President	Fernandez	Fernandez	Macri
Political inclination	Left	Left	Right
Can you disclose foreign currencies?	\checkmark	\checkmark	\checkmark
Can you disclose assets?	\checkmark		\checkmark
Is there a penality for disclosing?	\checkmark		\checkmark
Is there a reduced penality for repatriation?	\checkmark		\checkmark
Is repatriation required?		\checkmark	
Is there a credible information exchange threat?		\sim	\checkmark
Is there legal certainty? (currency controls)			\checkmark
How many people disclosed?	35k	16k	255k
How much was disclosed? (% GDP)	1.3%	0.5%	21%

A credible threat of detection? Yes Back

► The threat of detection was not credible prior to 2014 because Argentina had no TIEAs ⇒ It is difficult to catch people evading taxes offshore

 In October 2014, Argentina commits to exchange information by September 2017 (for FY 2016) for OECD-AEOI

In 2016: TIEAs with Uruguay (Sep'16), Switzerland (Nov'16), Brazil (Dec'16), and the US (Dec'16)

▶ In April 2016: Panama Papers were leaked

TIEAs made the threat of detection more credible • Back

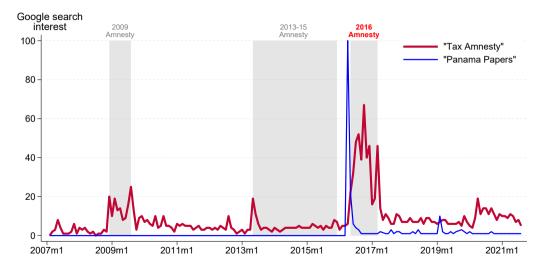
Timeline of agreements signed during the 2016 amnesty



Source: Slide taken from AFIP's communication campaign.

A credible threat of detection? Yes

Panama Papers leaked in April 2016 • Back



A credible threat of detection? Yes

Argentina's TIEAs are being used to enforce taxes • Back

LA NACION

Dólar: Oficial \$97,75 \$103,75 Blue \$180,50 \$184,50



"ELEVADOS PATRIMONIOS".

La AFIP tiene bajo la lupa 3000 cuentas bancarias de argentinos en el exterior

No fueron declaradas ante el fisco durante los períodos 2016 y 2017; la Administración Federal de Ingresos Públicos seguirá investigando información que recibió de otras entidades tributarias del mundo

Source: La Nacion, October 9, 2021.

- AFIP crackdown on foreign accounts thanks to TIEAs
- "3,000 foreign bank accounts under investigation"
- "They were not reported to AFIP in 2016 and 2017; the AFIP will continue to investigate information received from other tax entities around the world"
- Reinforces the value of TIEAs

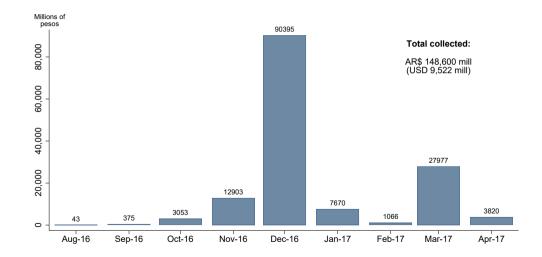
Generous tax incentives? Maybe •Back

Unlike for previous amnesties, 2016 amnesty participants expected the **wealth tax** to be progressively eliminated \Rightarrow encourages participation of evaders

Notwithstanding, 2016 participants also paid the highest **penalty rate**: up to 15% compared to only 8% in 2009 and 0% in 2013–15 \Rightarrow discourages participation of evaders but retains support and compliance of honest taxpayers

Moreover, conditional on participating, penalty rates do matter (but appear to have a limited effect if **repatriation** is required). Recall the 2016 penalty schedule: $\Rightarrow 10\%$ vs 15% for assets above US\$ 50k if disclosed before or after **Dec 31, 2016** $\Rightarrow 0\%$ if 1/3 disclosed value is invested in **treasury securities** or in domestic **mutual funds** for 5-vr

Most assets disclosed in Dec 16, before top penalty rate Revenue from Amnesty's Special Tax

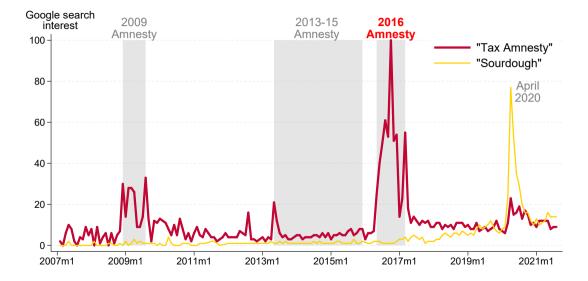


Salience? Yes

A massive advertisement campaign • Back



Salience? Yes • Back



Low compliance cost? Yes Screenshot of AFIP's main webpage • Back



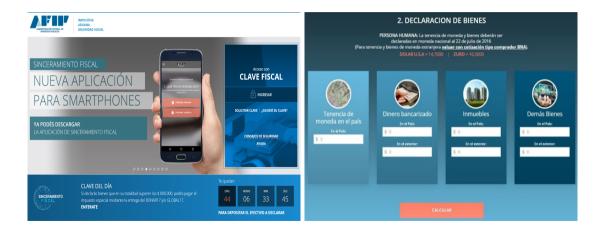
Translation:

Tax Amnesty (Sinceramiento Fiscal) "HOW TO DISCLOSE ASSETS"

"Access this video-tutorial for a step-by-step guide to report your undeclared assets and enjoy the benefits"

Low compliance cost? Yes

An App and a calculator to simulate the tax penalty • Back



Low compliance cost? Yes Screenshot of AFIP's main webpage



Translation:

Tax Amnesty (Sinceramiento Fiscal)

"This is an opportunity to do your part, declare all your assets, regularize your debt and, if you complied, find out about the benefits"

Low compliance cost? Yes Screenshot of AFIP's main webpage



Translation:

Tax Amnesty (Sinceramiento Fiscal)

"DO YOU HAVE UNDECLARED CASH?"

"You have until October 31st. Don't miss it out. You still have time!"

Under What Conditions is a Tax Amnesty Successful?

What does seem to work?

- $\checkmark\,$ A credible threat of detection thanks to TIEAs and leaks
- \checkmark Large tax incentives for evaders to disclose (but maintain support of compliant taxpayers)
- ✓ A favorable political economy thanks to a pro-market and business-friendly government and earmarking revenue for a perceived good cause
- $\checkmark\,$ High salience thanks to massive info campaign
- \checkmark Low compliance cost by simplifying the procedure to disclose

What does not seem to work?

- Tax incentives to repatriate assets
- Tax benefits for investing in treasury securities

An increase in the wealth tax to raise revenue for COVID-19 • Back

- The increase in reported wealth enabled the gov't to raise revenue progressively in 2020 to deal with the COVID-19 crisis News: [1] [2]
- A one-time wealth tax surcharge was levied on the 12.5k wealthiest people: MTRs between 2% to 3.5% for domestic assets and 3% to 5.25% for foreign assets
- Revenue was earmarked for health expenses (e.g., medical supplies, vaccines), subsidies for SMEs, and welfare for low-income households
 - ⇒ 10k people filed, with \approx USD 80B in taxable assets (50% located abroad) Reference: pre-amnesty taxable assets of wealthiest 10k \approx USD 41B
 - $\Rightarrow\,$ Collected \approx USD 2.66B (~80% of the projected revenue); \equiv 1 month of VAT revenue
 - \Rightarrow Non-filers were subject to higher audit rates