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## **OBTAINING TAX-RELEVANT INFORMATION FROM DOMESTIC SOURCES BY TAX AUTHORITIES: RUSSIAN AND INTERNATIONAL EXPERIENCE**

*KIRILL MASLOV\**

### **Abstract**

This contribution deals with the legal issues of obtaining tax-related information from the domestic sources by tax authorities. This article aims to confirm or refute the hypothesis that the approaches applied to the legal regulation of obtaining tax-relevant information from domestic sources in Russia and developed countries are common. At the same time, both developed and developing countries use specific innovations in this area, and this experience can be applied successfully in other countries. The methodology of the research includes general scientific methods (analysis, synthesis, induction, deduction, description) as well as partial legal academic methods (interpretation of legal acts, comparative legal method). The countries were selected from three groups depending on the level of GDP based on purchasing-power-parity according to the IMF data to compare their experience with the Russian one. The author analyzes information exchange between domestic public authorities; information exchange between tax authorities and taxpayers (including tax reporting, tax audit, responsibility for violation of information exchange duties); obtaining information about a taxpayer from third persons. The author proved the commonality of approaches used in the regulation of information support of tax administration from domestic sources in Russia and

\* Associate professor of Financial Law, Department of Constitutional and Municipal Law, Faculty of Law, Dostoevsky Omsk State University, Russian Federation. The author specializes in tax law, tax administration and tax security. He is the author of 5 books and more than 50 peer-reviewed articles in Russian legal journals. Contact e-mail: [maslov.omsu@gmail.com](mailto:maslov.omsu@gmail.com). ORCID: 0000-0001-8384-277X.

most developed countries. At the same time, some Russian management innovations can improve tax administration in any country of the world. They include the system of online cash registers, the system of labeling goods with RFID-tags (fur market) and QR-codes (pharmaceutical market), and electronic offices of taxpayers on the tax authority website. Specific aspects of the information support system of Canadian, German, Mexican and US tax administrations can be successfully introduced into Russian practice and that of developing countries.

**Key words:**

Tax information exchange, tax-related information, domestic sources, domestic bilateral agreement, tax audit.

**JEL Classification:** K340.

## 1. Introduction

The study of foreign experience of information exchange in tax administration is extremely important in identifying ways to improve the system of means of regulation in any country, especially in the countries of the former communist bloc. The experience of developed countries, where information technologies in public administration were introduced much earlier than in developing countries, is of great interest for analysis. It is equally important to take into account the experience of developing countries and transition economies, which are now on the same path and face the same challenges. A group of developed countries, i.e. countries with the highest GDP based on purchasing-power-parity according to the IMF data (such as the USA, the UK, Germany, France, India, Japan), a group of countries with a bit lower GDP based on purchasing-power-parity (such as Australia, Canada, Spain, Mexico) and developing countries of former communist bloc (Estonia, Moldova, Belarus, Kazakhstan) were selected to compare their experience with the Russian one.

Currently, considerable scientific attention is paid to the international exchange of tax-relevant information (see Bacchetta, P. and M. P. Espinosa. (2000); Keen, M. and Ligthart, J. E. (2006); Estellita H. and Bastos M. E. (2015); Christensen, H. and Tirard, J.-M. (2016); Kemme, D. M., Parikh, B, Steigner, T. (2017)), while tax authorities receive most of the tax-relevant information from domestic sources. These relations are not often studied by lawyers. For example, the following contributions may be mentioned: Jenkins G. P. (1996); Roberts L. (2000), Martinez-Vasquez J. and Timofeev A. (2005); Bird R. M. and Zolt E. M. (2008); Zolotare-

va A., Kireeva A., Kornienko N. (2008). However, they cover only selected aspects of obtaining information by the tax administration, without creating a holistic picture.

This article aims to confirm or refute the hypothesis that the approaches applied to the legal regulation of obtaining tax-relevant information from domestic sources in Russia and most developed countries are common. At the same time, both developed and developing countries use specific innovations in this area, and this experience can be applied successfully in other countries.

The methodology of the research includes general scientific methods (analysis, synthesis, induction, deduction, description) as well as partial legal academic methods (interpretation of legal acts, comparative legal method).

The set of powers related to obtaining information is practically the same for the tax administration of any country: receiving tax reports; conducting tax audits and inspections; seizing documentation, and inventory of taxpayers' property; obtaining tax-relevant information from people, companies, and public authorities.

## **2. Information exchange between domestic public authorities**

The exchange of information between various fiscal bodies and other public authorities is one of the most effective tools for identifying tax offences. Tax administrations in different countries can receive information from the public authorities both on a planned basis and by sending a special request.

The mechanism of planned data exchange is usually regulated on the basis of a developed system of agreements concluded between tax administration and the relevant state and local authorities. For example, a constant exchange of information between state and federal tax authorities has been established in the United States since late 1990s. A federal law obliged the US Internal Revenue Service to transfer to the tax authorities of the US states the information related to federal taxes. The transfer procedure is determined by the information exchange agreements between them. Information exchange includes: submission of copies of the results of all federal inspections and other actions that control tax returns; transfer of information from the tax returns themselves; third-party information related to the taxpayer in a separate state and accumulated in the IRS. Regional information exchange agreements are concluded between the tax authorities of states to improve administration and eliminate double taxation of sales tax, personal in-

come tax (which are introduced in each state). Most states use a uniform form of agreement developed at the federal level (Knyazev, Marshavina, 2010: 270-273).

Bilateral agreements regulate the procedures for interaction between the UK tax administration – HM Revenue & Customs – and other government agencies, for example, the National Crime Agency (OECD, 2017: 478; Sheredeko, 2008: 75–79).

Bilateral agreements formalize the transfer of information about the taxpayer's property that can be pledge subject from local authorities to the tax authority in Japan. The Estonian tax service receives data from local authorities on objects to state land tax on the basis of bilateral agreements. Conversely, data on vehicles subject to local tax is transmitted to the municipal tax authorities from the Estonian Road Administration (Martinez-Vasquez, Timofeev, 2005: 36).

Thus, the procedural regulation of information interaction of the tax administration with other authorities in foreign countries, as well as in Russia, is carried out on the basis of agreements. Uniform templates of agreements based on principles clearly described in the legislation are used in developed countries.

The legislation of most foreign countries, unlike the Russian one, directly obliges all state services to inform the tax authorities about the facts of possible tax evasion that have become known.

Information is provided by the public authorities, as a rule, without restrictions after the request of the tax administration. In Germany, the Federal Central Tax Office has the right to withdraw documents, as well as to obtain information from almost all public and private institutions in the country, with the exception of some special services.

In some countries (mainly developing), due to the weak organization of the executive power system, there is a practice to double-check the tax-related data received from public authorities by applying to other available sources. For example, the tax authorities of India and Mexico prefer to identify unregistered property (real estate) that is subject to property taxation through Internet mapping resources (e.g. Google Earth or Microsoft's VirtualEarth) along with the use of cadastre information (Bird, Zolt, 2008: 31). The experience of creating and using geographic information systems by tax authorities can be used in any country. In Russia it is difficult for the tax authorities to obtain up-to-date information about real estate objects and their owners only due to the formation of the Unified State Register of Real Estate. In the previous registers different models of systematization were used: in the State Real Estate Cadastre the basis for record keeping was the real

estate object, while in the Unified State Register of Real Estate Rights it was the subject of rights. Recording information about real estate objects and rights to them on the basis of a geographical map will allow, firstly, to avoid such problems, and secondly, to quickly identify unregistered objects.

Great attention is paid to the regulation of electronic exchange of information between authorities, including tax administration, in developed countries. Such relations are considered there (as well as in Russia) as part of a more general program of e-government development. But, despite the announced priorities, the implementation of this program in Russia is extremely slow. Although the Russian Federal Tax Service has made fantastic progress in informatization of its functions, the lag of other public authorities significantly reduces the efficiency of tax administration.

Even a general overview of legislation in developed countries, including the United States, shows a systematic approach to the implementation of “e-government” and the regulation of this process. The US Paperwork Reduction Act enshrines the principle of reducing the collection of information and reporting by the federal government in paper form. The Act also instructs the Executive Office, together with the governing body in the field of telecommunications, to determine the rules for the use of electronic signatures in the activities of federal authorities; to realize functions of acquiring and implementing the technologies necessary to replace paper documentation with electronic media.

The Computer Security Act requires federal agencies to develop information security plans and entrusts the National Institute of Standards and Technology with the task of developing computer security standards at the federal level. The Clinger-Cohen Act introduced the concept of “chief information officer” in each executive body, established procedures for decentralized and orderly collection of information, taking into account electronic technologies, and assigned to the Executive Office the functions of planning the attraction of investments in the development of information technology in administration (Seifert, 2003).

The priority of the electronic form of information exchange requires the formation of departmental information resources in accordance with the principle of information and technological compatibility between them. This practice of creating a single information field in which information is exchanged is already being implemented in the former Soviet countries. According to the Law of the Republic of Moldova of November 21, 2003 No. 467-XV “On Informatization and State Information Resources” each government decree approving the regulation

on the functioning of a certain automated system must indicate the structure of such a system, the sources of information that fill it, the list of persons and bodies involved in the collection and processing of information. At the same time, the Ministry of Information Development of Moldova uses a uniform software environment to integrate all information systems into a single one (Crudu, 2019: 84).

Detailing the principles of the formation of a single electronic space of authorities in a single legislative act may be very useful in Russia as well as in any state.

Complex regulation of information support of tax administration coupled with the development of telecommunication technologies gives significant results in developed countries. For example, it makes possible the work of large data centers, which accumulate relevant information from many external sources. The United States has established a large interdepartmental center for the collection, storage, processing and analysis of financial information. The core of the center is an electronic data bank of persons related to illegal financial transactions. This bank constantly exchanges information with federal and local administrative and law enforcement agencies.

The regional tax offices in France include special units to ensure interaction with public authorities. They have databases on land taxation, housing tax, as well as data on the availability of racehorses, yachts, aircraft, large bank transfers, and other information on significant expenses of taxpayers (Semenov, 2009: 45–48).

Active cooperation of tax authorities with each other as well as with other law enforcement agencies in many countries is considered as one of the strategic priorities of administration. The work organization of tax services of developed countries is on the way to create units on a functional basis (especially in the information sphere). The trend is to maximize the use of electronic document management and the organization of data centers.

Fifteen such centers have been formed in France; there are ten such centers in the structure of the US Internal Revenue Service. They accumulate all information about taxpayers. Structuring and storage of information in the United States is carried out in seven card files depending on taxpayers and type of taxes paid by them. Access to databases is provided to all units, regardless of their remoteness from the center. In this case, each employee of the IRS can access only those blocks of data that are directly related to the functions he performs.

The Information Processing Department also exists in each Office of the IRS. Information is collected at the initial stage in such departments and then data are

transferred to one of the centers. Information interaction between the Federal IRS and independent tax services of the US states has been established, with the results of the control measures carried out by the Federal IRS being transferred to the tax services of the states.

The analysis shows the need to develop the functional division of the national tax administrations in the context of increasing the number of data centers and the transfer to them of all flows of tax-relevant information.

### **3. Information exchange between tax authorities and taxpayers**

The responsibilities of taxpayers in the field of information in foreign countries differ significantly depending on whether the tax and legal regulation in the state is solely for fiscal purposes or is aimed at ensuring a balance between the interests of taxpayers and the tax administration.

#### **3.1. Tax reporting**

There is a tendency to mandatory declaration of income by all categories of taxpayers in the world. In the US and Sweden, for example, all employed persons are required to submit tax returns, however, in a simplified form.

Such regulation leads to the significant efforts of tax administration to assist taxpayers in submitting tax returns. In their work tax administrations proceed from the fact that the ease and simplicity of interaction with them is one of the best guarantees for the fulfillment of their information duties by taxpayers. The main principles of the work of the tax authorities of most developed countries are: the ease of interaction with customers, maximum availability, clarity and accuracy of the explanations provided (Sheredeko, 2008: 75–79).

The Taxpayer Advocate Service of the US Internal Revenue Service publishes more than a hundred free handbooks and information publications on tax issues, organizes special educational programs for small businesses, conducts free telephone counseling. “Day of the taxpayer” is held every month in the offices of the IRS, when people visiting the tax authority can get expert advice of inspectors. Officials of the IRS provide free assistance in completing tax returns to people with low incomes using the help of volunteers.

Similar work with taxpayers is carried out by the Canadian Revenue Agency. In addition, officials of this Agency are often invited to speak at annual meetings of business associations, participate in “round tables” at national conferences

of industrialists and entrepreneurs, sponsor courses of professional tax training and participate in business fairs. Other educational activities include speaking at schools, colleges and universities. To resolve issues related to the submission of tax reports that arise in the professional community, the Canadian Revenue Agency practices the creation of joint working groups. For example, the contradictions between the approved form of the tax return on income tax for insurance companies and the law were eliminated, and a less burdensome for the taxpayer form of the tax return was developed in Canada as a result of the activities of such a group, formed of employees of tax authorities and representatives of insurance companies.

The Accounting Advisory Program for newly established enterprises implemented by the Australian Taxation Office is very interesting. Specialists of the Office themselves visit such enterprises precisely to resolve problems arising from entrepreneurs with the application of tax accounting rules. It is not allowed to prosecute after such consultations (The Australian, 2015).

Much more attention is paid to the status of professional tax consultants in foreign legislation, in comparison with the Russian one. The mechanisms of economic stimulation of their activity are provided. Most developed countries (e.g. Austria, Germany, Netherlands) establish only general principles of tax advisors' activity, transferring more detailed regulation to the level of self-regulatory organizations, which are created on a mandatory basis (Matyushenkova, 2000: 151–153). This experience, by analogy with the self-regulation of audit activities, may well be transferred to Russia and many developing countries. In Russia taxpayers, on the contrary, are deprived of any significant guarantees of obtaining tax-relevant information. The administrative regulations prohibit officials of the tax authorities to advise taxpayers on practical issues of taxation. Explanations of the Ministry of Finance of Russia often contradict the court practice of application of tax rules or contradict each other. The process of providing tax assistance by private consultants is not formalized at all. Although Russian legislation does not provide for mandatory declaration of income by all individuals, this circumstance cannot justify inattention to advisory functions of the tax service. Although in recent years the service component of the work of tax authorities in the Russian Federation has become more evident, the use of the experience of foreign countries is still relevant.

Reforms aimed at changing the nature and system of filing and processing of tax information constitute a special group of reforms implemented in developed countries in the mid-1990s – mid 2000s (Titov, 2017: 110–111).

Tax reporting through various communication channels has become widespread in developed countries. Various forms of interaction between taxpayers and tax authorities are practiced during the submission of tax returns and reports. It allows accelerating the exchange of declared data, and reducing and promptly correcting errors that arise when submitting tax returns (Roberts, 2000: 2–10). At the same time, the electronic form of submitting tax returns is not established as the only one possible even in developed countries with a high level of information technology dissemination. Thus, about 75 % of taxpayers use the right to submit tax returns in electronic form in Australia, and this is considered to be quite high in foreign countries. In Russia, according to the latest data, about 80 % of organizations and individual entrepreneurs submit tax returns electronically – this level is quite acceptable for developed countries.

The main methods of submitting tax returns in developed countries are almost identical and differ little. This is, first of all, self-completion of tax return and its sending through a specialized telecom operator licensed to provide such services. This system began to be used in the United States in the early 1990s and was later introduced in Canada, Germany, Great Britain, Australia, Costa Rica and many other countries.

Secondly, filling in the online reporting form on the website of the fiscal authority or a specialized operator.

Third, filling in and sending reports through an intermediary firm (audit, consulting, etc.).

Fourth, the transfer of paper reports to the tax authority in person, through a representative or by mail.

In addition, in some countries, for example, in Canada, the taxpayer has the right to send reports by calling a toll-free number (the TELEFILE system for citizens who “long and correctly” submit simple tax returns).

All of those methods (excluding TELEFILE system) are used in Russia successfully.

The receipt of an electronic signature by the taxpayer is a necessary condition for reporting via telecommunication channels. In addition, the taxpayer must enter into a special agreement with the tax service to use the electronic form for filing tax returns in some countries (e.g. Sweden, Lithuania) (Jablonskiene, Semionov, 2004: 3).

In some States, given the complexity of the electronic digital signature, a special numeric code is used instead (in Australia it is called “tax file number”).

It is possible to submit reports electronically in Russia only with the use of an electronic signature as in most states. However, it is necessary to introduce a simpler mechanism of tax reporting identification due to the backwardness of the certifying centers, and taking into account the experience of some countries (e.g. Australia). Since the use of electronic reporting in Russia has a very short history, it is interesting to consider the experience of developed countries in optimizing this mechanism.

In Turkey the tax return is automatically computer-checked for errors in calculations and inconsistency of data after being sent to the tax service. The notification on the revealed errors is also formed and sent to the taxpayer by the program. The taxpayer sends an electronic confirmation after correcting the discrepancies and the tax return is considered officially submitted only from that moment (Ozgen, Turan, 2007: 6). This mechanism greatly simplifies desk tax audit and is already used in Russia when filing electronic tax reports.

An established feedback mechanism that allows the taxpayer to verify the correctness of registering the fact of fulfillment of the tax obligation in the tax authorities is important in encouraging the submission of tax returns in electronic form.

The Australian Taxation Office collects information from individuals and legal entities each year to assess the administrative costs of taxpayers and to assess the possibility of reducing them. For example, when filling out tax reporting forms, taxpayers automatically fill out a section that fixes information about the time of filling in these forms. As a result of the analysis of this information, the Service annually optimizes the composition of the form of tax returns, which eases the burden of taxpayers on submission of reports. Moreover, the Australian Taxation Office publishes in the annual edition of “Tax Statistics” the information on the time spent and the cost of preparation of tax returns by taxpayers, the amount of payments to tax consultants and other administrative expenses of taxpayers that are not directly related to the payment of taxes.

In March 2002, the Australian Taxation Office launched the project “Listen to society”, which aims to analyze taxpayers’ expectations of tax administration in order to improve the system. The Office consulted with taxpayers through special surveys, forums and sessions. As a result, taxpayers and tax agents reported on their expectations in the areas of: 1) more rapid telephone consultation; 2) in-

creasing opportunities for information exchange in the “online” mode; 3) achieving greater stability in the relationship between the tax authorities and taxpayers, etc. The results of this program are reported annually by the Australian Taxation Office.

The simplicity of tax reporting directly affects the reduction of cases of failure to submit it to the tax authorities. Following the example of the US Internal Revenue Service, the Canadian Revenue Agency, the Australian Taxation Office, it is necessary to organize in Russia as well as in other countries various forms of assistance to taxpayers in completing tax returns and solving other issues related to taxation.

Such forms should include:

- distribution of handbooks and information publications explaining the procedure for tax registration; filling in and submission of tax returns;
- expanding the practice of seminars on taxation conducted by officials of the tax administration;
- organization of the system of prompt consultation of taxpayers (including the use of modern communication systems);
- economic incentives for tax consultants who provide services to small businesses;
- participation of tax officials in meetings of professional associations of businessmen; prompt response to complaints of professional associations of entrepreneurs, including through interaction within the working groups;
- measurement of administrative costs of taxpayers for tax reporting, annual publication of the results of such measurement.

Simplification of procedures of registration of the electronic signature (including its registration in tax authorities) will make submission of tax returns in electronic form more accessible and widely applied. For the same purpose, it is logical to provide for mechanisms to encourage taxpayers who submit tax reports in electronic form, and organizations that provide assistance in this regard.

At the same time, the proposals of scientists to extend the obligation to submit electronic tax reports to all taxpayers are not efficient. Electronic reporting remains largely a taxpayer’s right, not an obligation even in countries with a much higher level of information technology development than in Russia.

### 3.2. Tax audit

The essence of tax control measures used in different countries is quite typical in spite of the differences in the names, grounds for appointment and procedures. The tax control measures mostly used are: checks of documents at the location of the taxpayer (field audit) or tax authority (desk audit); inspection of premises and territory; seizure of documents; interrogations that are carried out during tax audit.

Unlike the Russian Federation, the timing of field audit in many OECD countries is not limited. This approach is enshrined in the laws of Australia, Canada, Norway and Japan. The deadline for field audit in many other countries is much higher than in Russia. It is 18 months in Mexico, 12 months in Spain (in particularly difficult cases, this period is extended, but not more than to 12 months). France and Italy use a different approach (which is partially reflected in Russian legislation) – the term of the field audit is calculated on the basis of the time of the actual location of the inspectors on the territory of the taxpayer. However, the term of audit is much shorter, it is 30 days in Italy and 3 months in France (Tulubenskiy, 2006: 112).

The tax audit covers a longer period of the taxpayer's activity in foreign countries, as a rule, in comparison with the period established by the Russian legislation. Additional charges can be made for a five-year period in the USA, in Germany (in case of suspicions of deliberate concealment of income) – for a ten-year period.

Providing explanations in the process of field audit is not the right but the duty of taxpayers in most foreign countries (USA, France, Germany, Switzerland). Moreover, there is a practice to conduct consultations with the taxpayer (his representative) in Finland immediately before the audit in order to clarify the specifics of its activities, commercial relations, peculiarities of tax accounting. Providing explanations during desk audits remains a right of the taxpayer in many countries, for example, in the Czech Republic (Radvan, 2010: 58).

As a rule, foreign legislation does not allow a taxpayer to refuse to provide information within the framework of a regular tax audit on the grounds, for example, that this information may lead to a charge of committing a crime. "But if the taxpayer has already been charged with a crime (including tax crime), he, of course, gets the right to remain silent" (Filon, 2009: 112) A similar approach is reflected in the Russian legislation.

In most countries, the taxpayer is obliged to submit certificates to the tax auditing officials, submit financial statements, journals, business documents and other

documents. If the taxpayer cannot provide the necessary and sufficient information or if this information is not sufficient to clarify the essence of the issue, the tax inspector has the right to apply to other employees of the taxpayer for information. The tax inspector in the UK, if necessary, can not only request the available documents from the taxpayer, but also can require the taxpayer to recreate the document or even issue a new document confirming a particular fact, event, transaction arising from the tax reports of the audited entity. This approach is certainly not applicable in the Russian tax system.

Many countries (e.g. Sweden, Japan, USA, Canada, the UK) have introduced the obligation of the taxpayer to submit electronic accounting and tax registers during tax audits.

The possibility of submission of documents in electronic form is provided in Russia since 2010, but only if documents were originally compiled in electronic form according to the established formats, as well as scanned documents. In order to further develop this form of information submitting in Russia it is necessary to clearly establish the duty of the tax service to approve the formats of accounting registers and to describe the legal regime of electronic documents in the basic legislative acts.

Regarding the application of the experience of foreign countries in obtaining information from taxpayers in the process of tax audit, it is necessary to summarize the following.

Taking into account the specifics of the mentality of Russian taxpayers, it seems inappropriate to inform them in advance about the appointment of a field tax audit. International experience points to the need for unambiguous legal fixation of the taxpayer's responsibilities to provide explanations at the request of the tax authority in the process of field tax audit with the simultaneous establishment of legal responsibility for violation of such obligation. The legislation gives the taxpayer broad rights to self-organization of the tax accounting system. In this regard the correct identification of the actual circumstances of its activities is often not possible in the absence of explanations from the taxpayer. The specific nature of the legal status of a person as a taxpayer requires the consolidation of the obligation to submit not only documents to the tax authorities, but also explanations on them.

The German experience in identifying such a person among the taxpayer's employees who is directly responsible for interaction with the tax authorities during

the audit meets the purposes of providing the tax authorities with timely information.

### **3.3. Responsibility for violation of information exchange duties**

The establishment of liability for two types of violations related to the declaration of objects of taxation is the most common in the legislation of different countries: for failure (late submission) of the tax return and for distortion of data in the tax return.

In a number of countries (for example, Australia, Belarus) an additional tax is collected for non-filing, late filing of the tax return, for failure to provide the requested information, and submission of distorted information on taxes. The amount of such additional tax is determined by the tax authority based on the circumstances of the offence and can be up to 150 % of the amount of unpaid tax in Belarus, up to 200 % – in Australia and up to 300 % – in Spain.

In most countries, the penalty for violation of reporting deadlines depends on the number of months of delay, but has a reasonable limit: up to 10 % in Austria, up to 12 % in Azerbaijan, up to 50 % in Kazakhstan.

The fine for violations of submitting tax returns is usually charged depending on the size of the undeclared tax base (for example, in Italy and Armenia). The fine is applied in Finland only if the errors have not been corrected after the relevant requirement of the tax authority, and can reach up to 40 % of the amount of tax calculated in the tax return (Kucherov, 2003: 290–304).

The legislation of foreign countries also differs in the qualification of violations of the tax return submission procedure. In some countries (e.g. Switzerland) failure to submit a tax return is considered to be an administrative offence only, while a deliberate misrepresentation of the tax return is already considered a crime. In Germany, both types of acts are regarded as crimes.

Thus, there is a tendency in foreign countries to limit the amount of the fine charged in case of violation of the terms of submission of the tax return.

## **4. Obtaining information about a taxpayer from third persons**

The right to obtain information about a taxpayer from persons who have it is widely used by tax authorities in different countries. It is especially important to pay attention to the forms of obtaining information that are not so widespread in Russia. The so-called informants are often an important source of information in

developed countries, unlike Russia. In Germany, anonymous information from the taxpayer's employees (including former employees), business partners, former spouses, neighbors is used as a specific source. Informants' messages are also used in the activities of the Canadian Revenue Agency, the US Internal Revenue Service. In the United States, the use of informants, including on a fee basis, is specifically regulated by the law and the U.S. Department of Justice Guidelines Regarding the Use of Confidential Informants of January 8, 2001. Informants submit information free of charge in some countries (for example, in Switzerland), but, for example, in the USA, France, Canada the informant can receive remuneration (in the USA – up to 25 % of the amounts hidden by the taxpayer, but not more than USD 200 thousand).

Encouragement of persons who have information about the violation of the tax legislation to disclose such information is an important guarantee of information support of tax administration. The elements of such encouragement mechanism should include an increase in the general level of legal culture; financial incentives; an effective witness protection system.

In addition, a mechanism for searching and analyzing the tax-relevant information from open sources has been established in most developed countries. For example, special units of the French tax authority are engaged in the search and identification of taxpayers who do not submit reports by obtaining secret information from banks, large restaurants and retail chains, as well as by analysis of various databases, newspaper and other publications (advertisements, gossip columns, etc.). The data obtained by such structures are considered to be super-confidential.

In the process of monitoring the tax discipline, the tax authorities of foreign countries actively use both internal sources of information and information coming from external sources (industry analytical studies, databases of analytical and rating agencies, other information that allows deeper understanding of the economy and the specifics of doing business by enterprises in various sectors of the economy).

Foreign experience shows that a systematic approach to the use of information obtained without a special request can significantly improve the quality of tax administration. Therefore, it is necessary to intensify the collection and analysis of such information by tax authorities in Russia and in developing countries by recruiting special inspectors endowed with such powers in relation to information about the largest taxpayers.

## 5. Conclusion

Thus, the aims of the research were achieved, research hypothesis was confirmed. We can state the commonality of approaches used in the regulation of information support of tax administration from domestic sources in Russia and most developed countries.

At the same time, some Russian management innovations can improve tax administration in any country of the world. Russia is part of the so-called “Brisbane Club” of the most technologically advanced tax administrations in the world (along with Australia, Singapore and Canada). Russian information systems of tax administration: Automated Control System VAT-2, the system of online cash registers, the system of labeling goods with RFID-tags (fur market) and QR-codes (pharmaceutical market), electronic offices of taxpayers on the website of the tax authority - have no analogues in most countries of the world.

At the same time, specific aspects of the information support system of foreign tax administrations can be successfully introduced into Russian practice and practice of developing countries. It is necessary to consolidate the legal framework of the tax administration activities in the following areas:

- identification of ways to reduce the cost of tax reporting by forming working groups with the participation of taxpayers, by conducting sociological research (based on the experience of Canada, Australia, the USA);
- formation of a database of managers, chief accountants, tax consultants of organizations applying tax evasion schemes (based on the experience of Norway);
- development and use of geographic information systems for effective administration of property taxes (based on the experience of Mexico);
- training of officials of tax authorities administering the largest taxpayers concerning the basics of the production of goods (works, services) in the relevant industries in order to improve the analysis of information on the activities of taxpayers engaged in these industries (based on the experience of Canada);
- stimulation (moral and monetary) of the persons disclosing information on possible commission of tax offence (on the basis of experience of the USA, Germany, France);
- organization of special departments collecting signal information about the taxpayer from open sources (based on the experience of France).

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