

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

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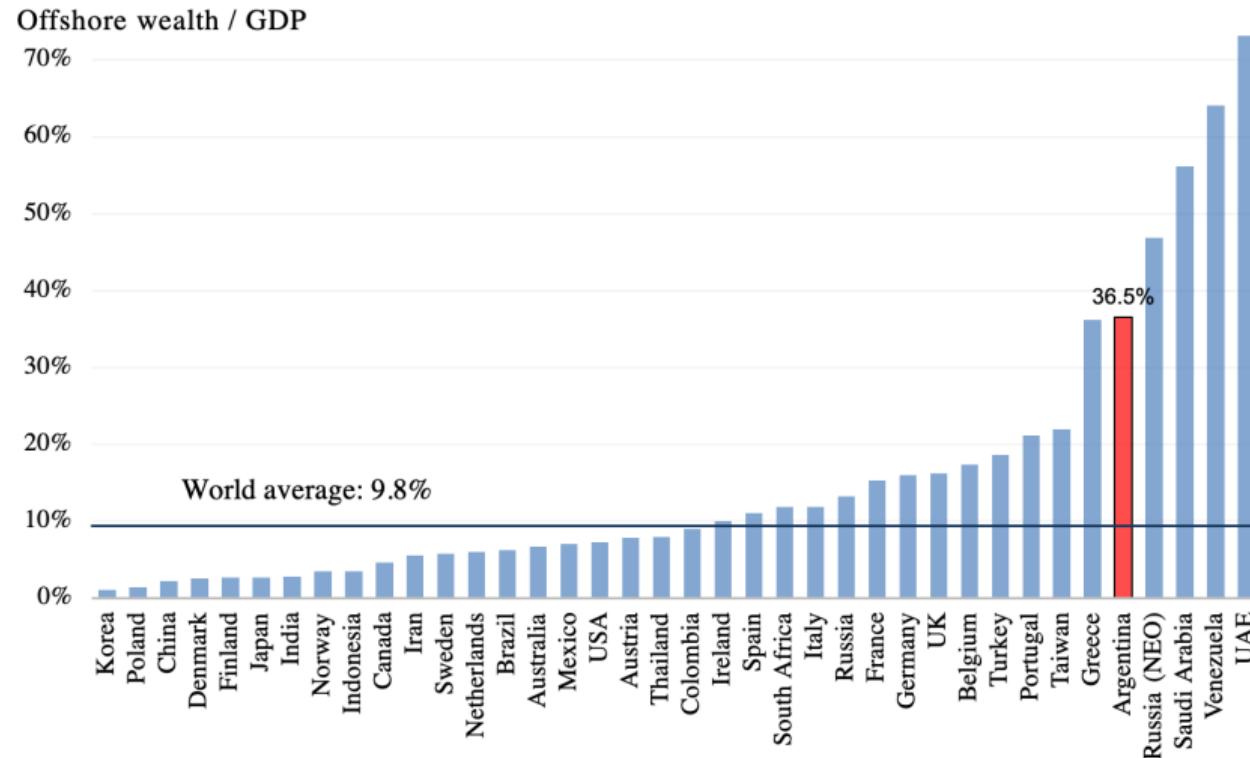
## Motivation

- ▶ **Offshore evasion** presents important challenges for tax policy ([Slemrod'19; Zucman'15](#))
  - Erodes tax revenue and hampers tax progressivity
- ▶ Policy activity has been prolific...
  - **Tax amnesties** in 50+ countries ([OECD, 2015](#))
  - **International tax coordination** (e.g., CRS, FATCA, TIEAs)
- ▶ Understanding how these policies can effectively work together is crucial
- ▶ But it's 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. **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?
  3. **Argentines report assets annually** because there is a gross wealth tax

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



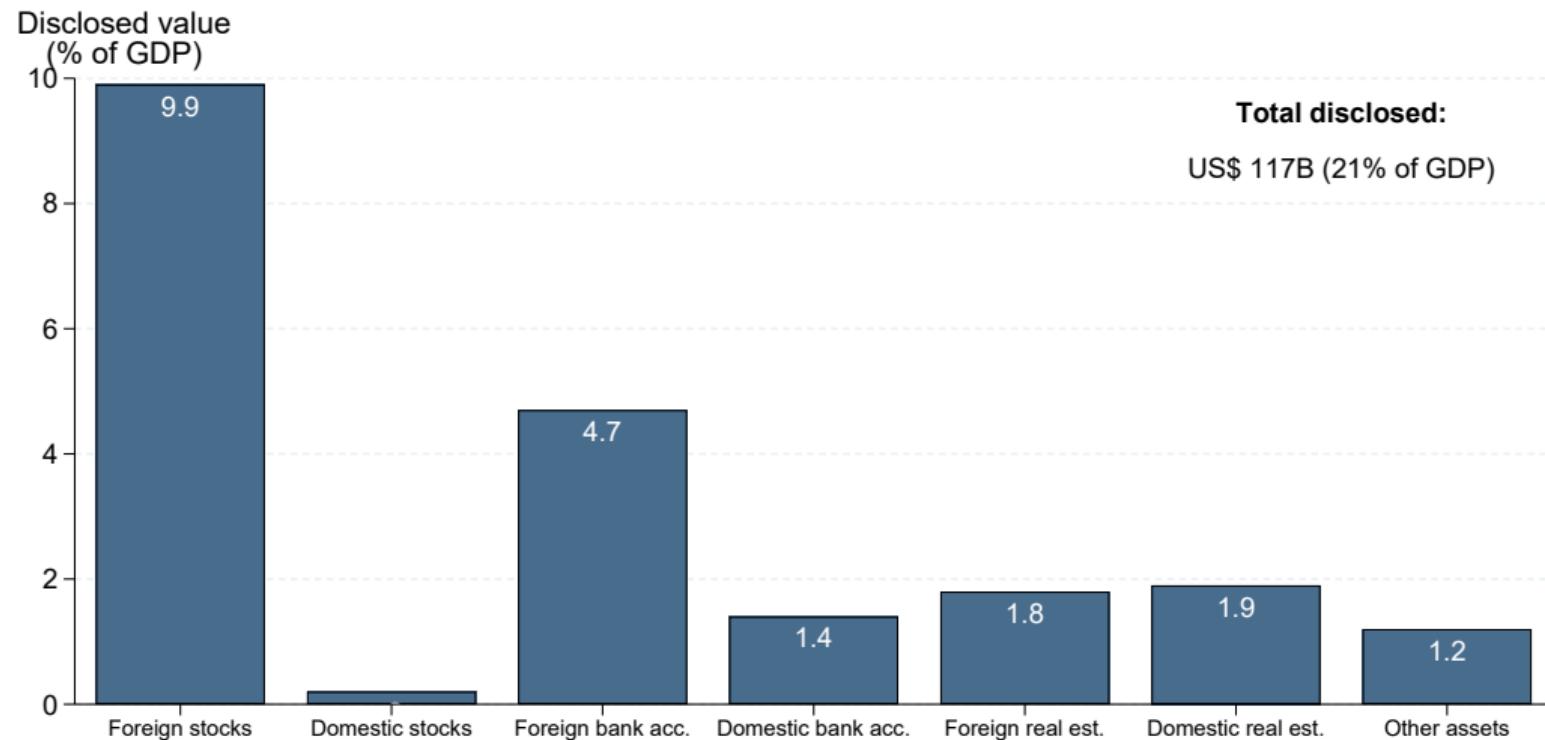
Source: Alstadsæter, Johannessen, and Zucman (2018)

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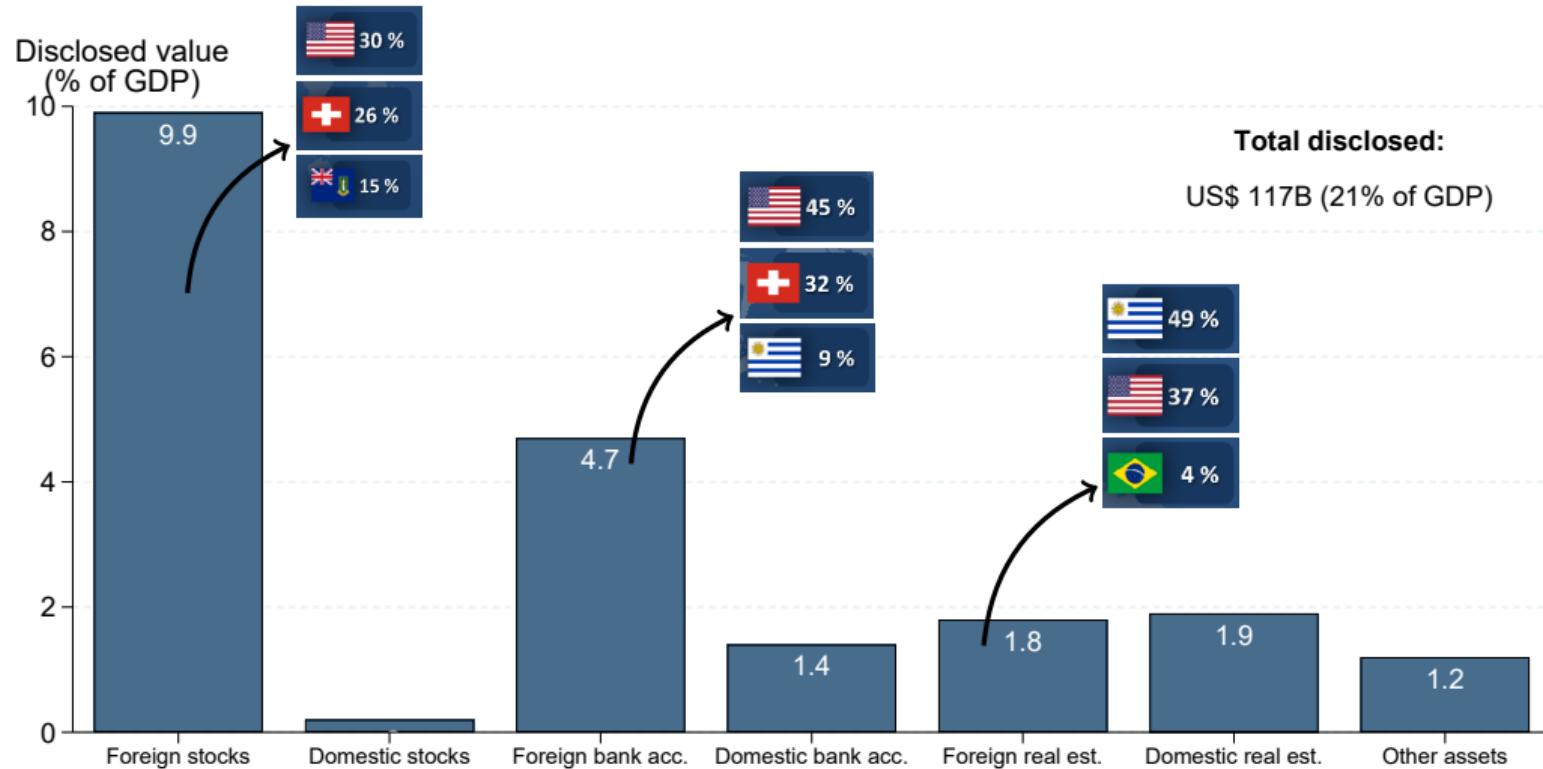
# Disclosed assets made under the 2016 amnesty by 255k participants

80% hidden abroad (mostly financial); raised 1.8% of GDP from a one-time tax ➔



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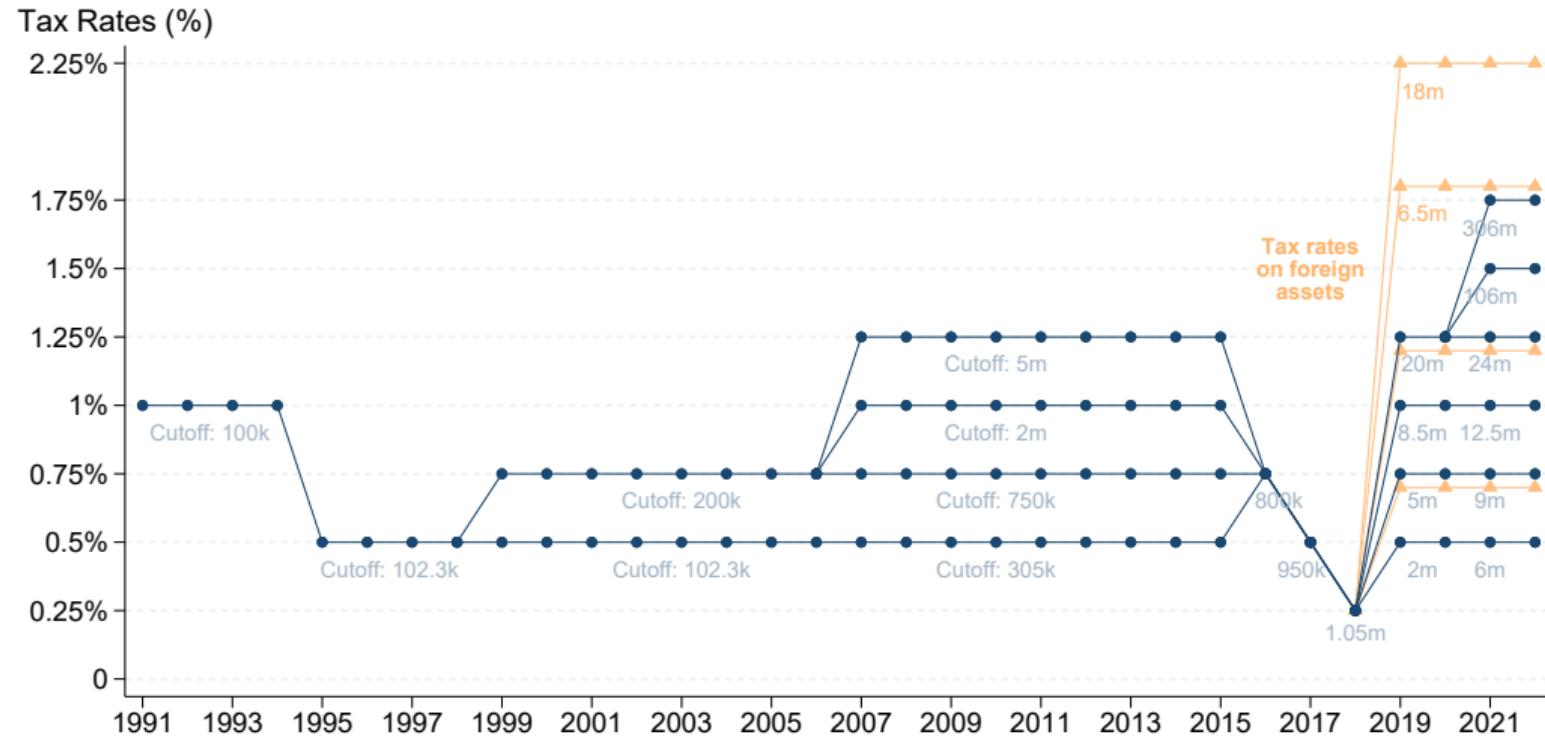
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  3. **Argentines report assets annually** because there is a gross wealth tax

# Argentina's wealth tax rates have ranged from 0.25% to 2.25%



## This paper

- ▶ The extensive scale of asset disclosures provides an opportunity to utilize straightforward methods to unpack the effects of changes in tax enforcement
- ▶ Employ two decades of detailed tax tabulations + Pareto interpolations to shed light on
  1. the prevalence, nature, and distribution of disclosures and 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), Guyton et al (2021)

- ▶ Voluntary disclosure programs

Alstadsæter et al. (2019, 2022), Johannessen et al. (2020), Langenmayr (2017), Leenders et al. (2023),  
Londoño-Vélez & Ávila-Mahecha (2021), Gil et al. (2023), Baselgia (2024)

→ Argentina offers the world's largest natural experiment with tax amnesties

→ Enables to shed light on the factors contributing to better offshore tax enforcement

→ Large disclosures are possible in this current landscape of global tax coordination  
...even in a developing country with a lot at stake and a history of unsuccessful amnesty programs

# Outline

## Asset Revelations, Progressivity, and Revenue

- Enduring Increases in Reported Wealth

- Disclosures by Top Wealth Groups

- Expanding the Wealth and Capital Income Tax Bases and Revenue

## Do Taxpayers Repatriate Assets in Response to Tax Incentives?

## What made the 2016 amnesty different?

# Outline

## Asset Revelations, Progressivity, and Revenue

### Enduring Increases in Reported Wealth

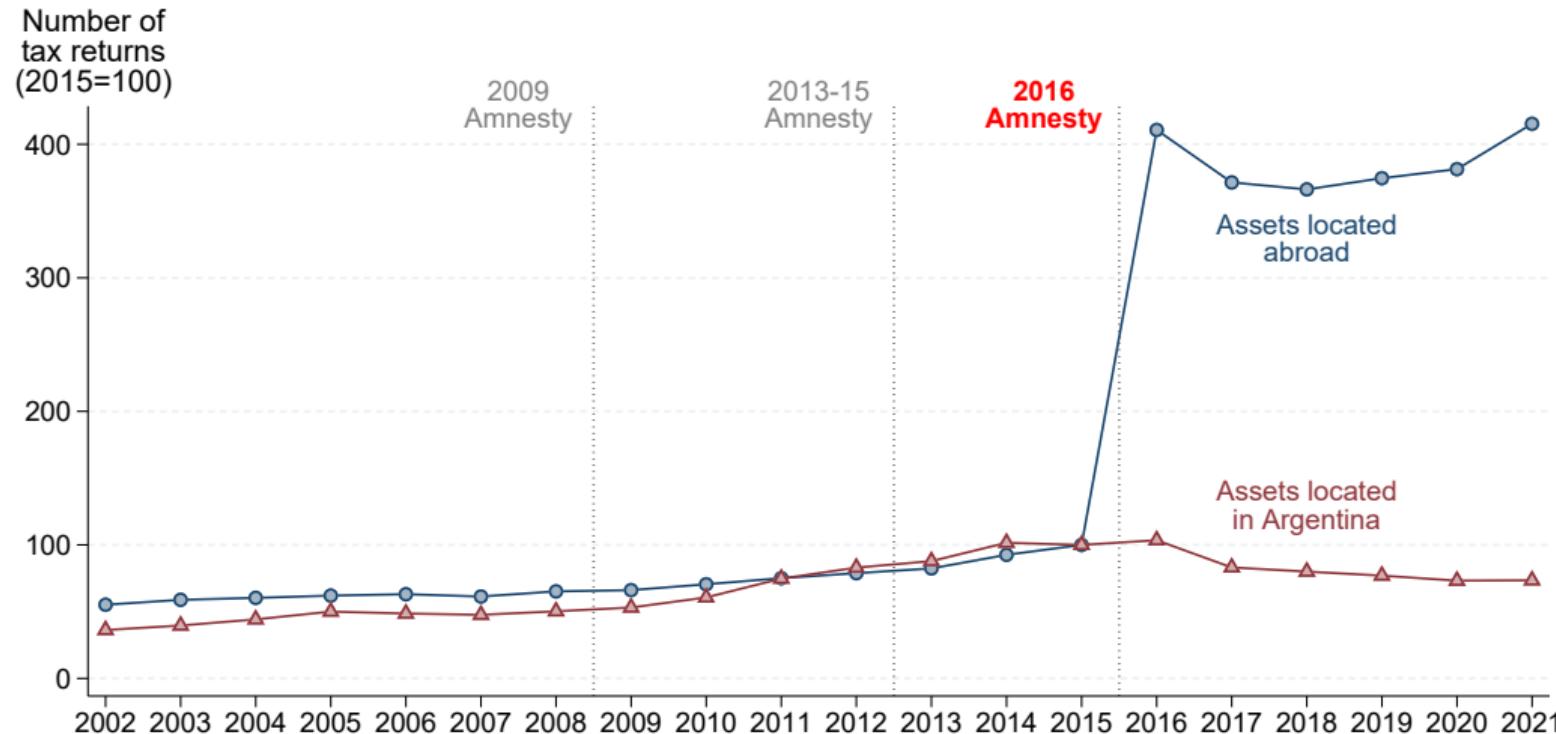
Disclosures by Top Wealth Groups

Expanding the Wealth and Capital Income Tax Bases and Revenue

## Do Taxpayers Repatriate Assets in Response to Tax Incentives?

## What made the 2016 amnesty different?

# The number of wealth taxpayers declaring foreign assets tripled after 2016



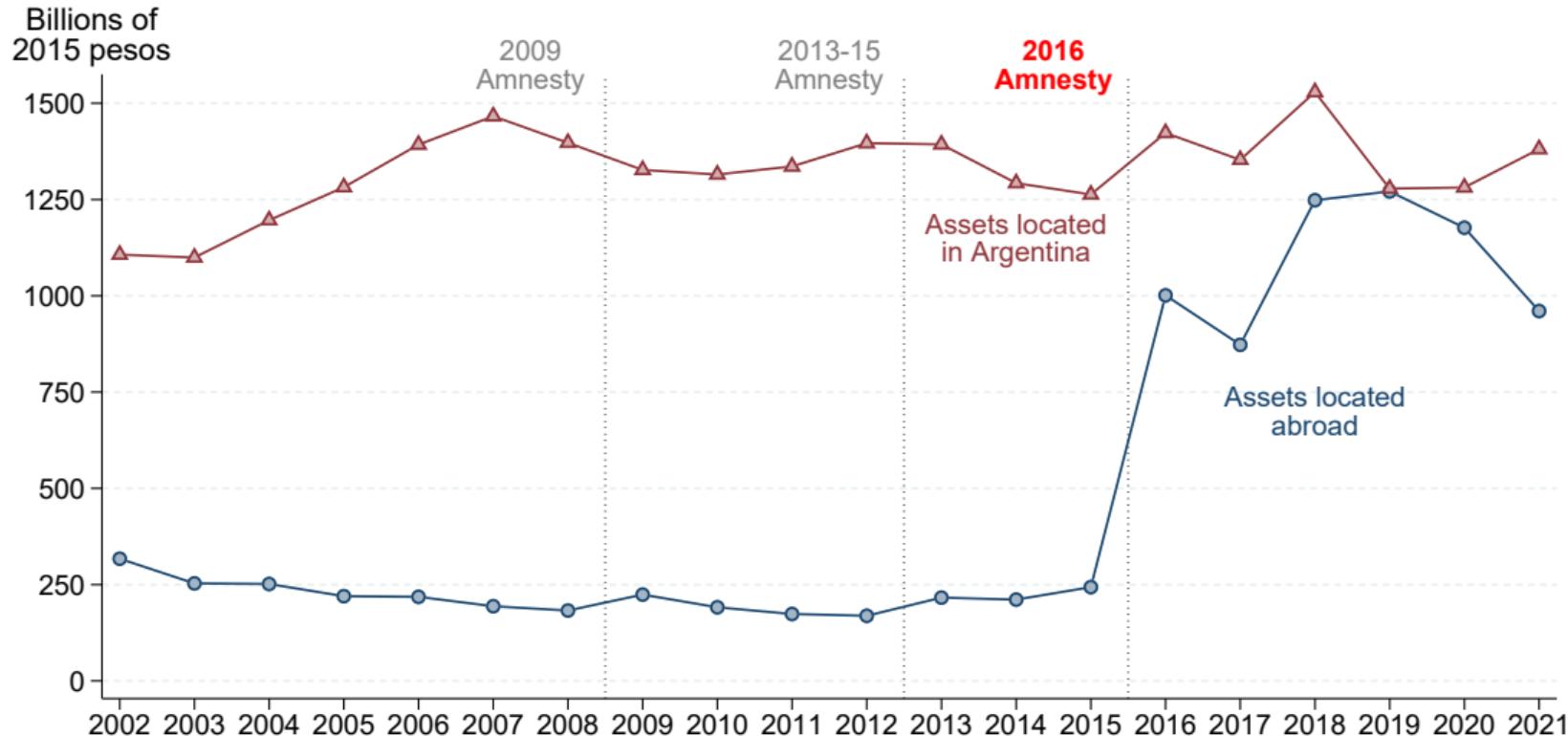
Notes: There are 28,816 returns for foreign assets and 1,241,683 for domestic assets at baseline (2015).

▶ See levels

# ... and the value of reported foreign assets quadrupled



Anatomy



# Outline

## Asset Revelations, Progressivity, and Revenue

Enduring Increases in Reported Wealth

**Disclosures by Top Wealth Groups**

Expanding the Wealth and Capital Income Tax Bases and Revenue

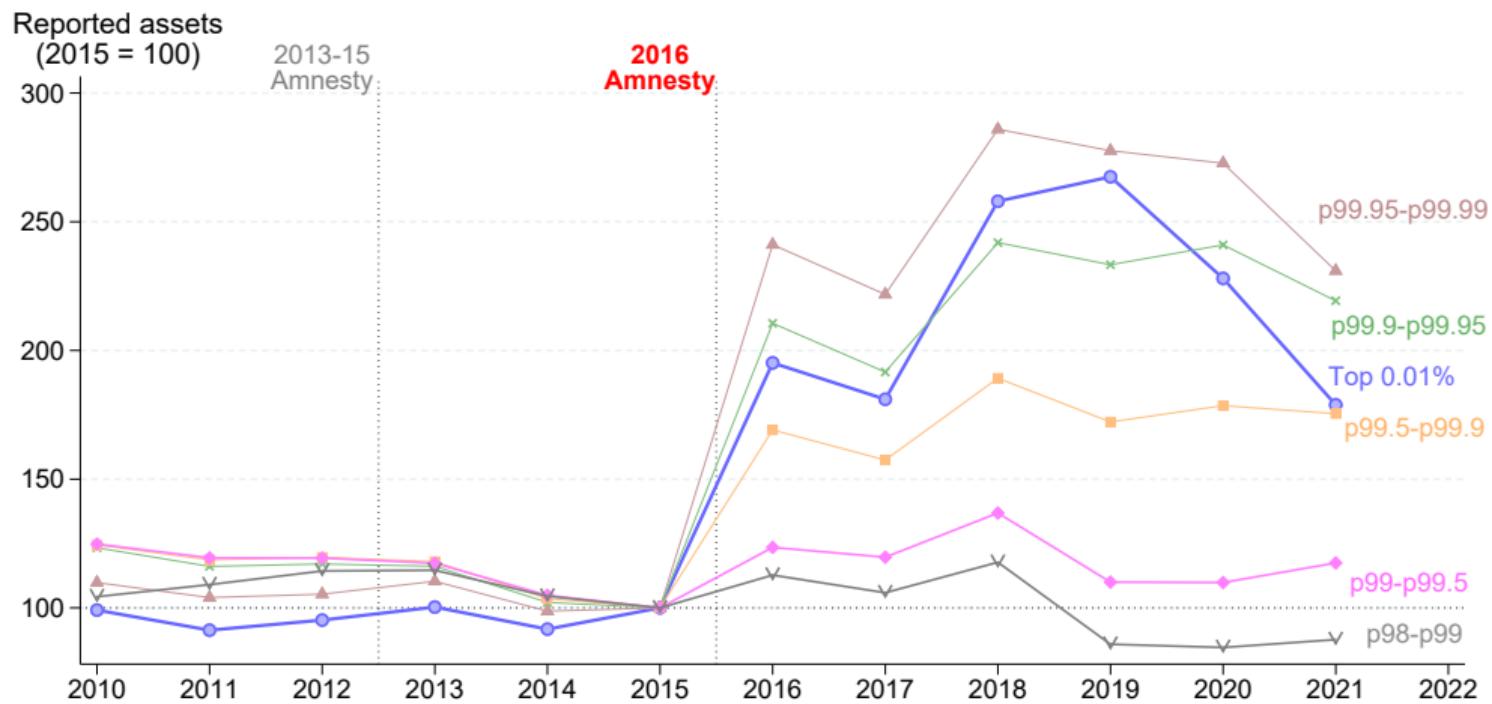
Do Taxpayers Repatriate Assets in Response to Tax Incentives?

What made the 2016 amnesty different?

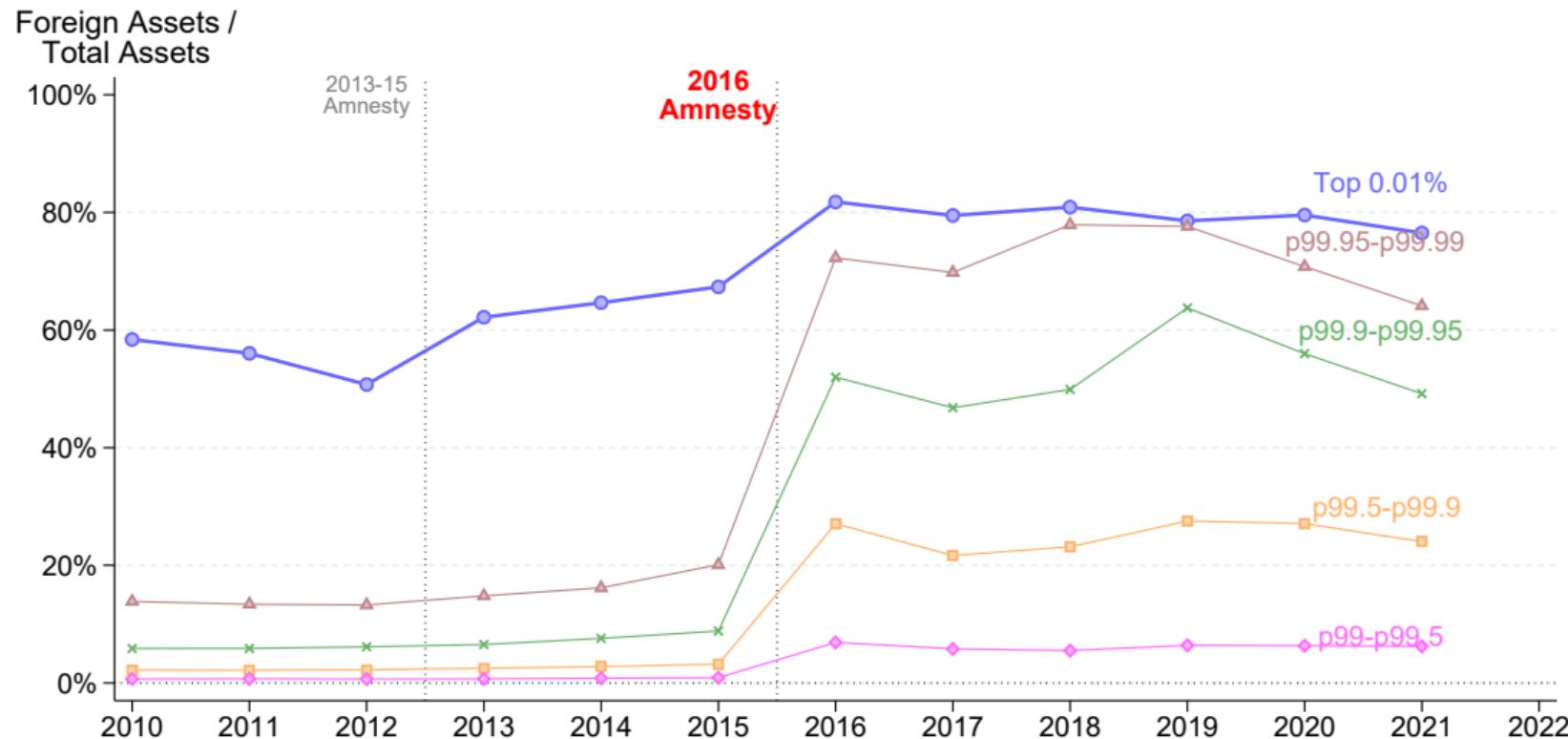
# The disclosures expanded the amount of wealth reported by the top 0.1%

Report to own 2x-3x as many assets as before the scheme

► Reshuffling



... and the share of foreign assets declared by top 0.1% tripled



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Enduring Increases in Reported Wealth

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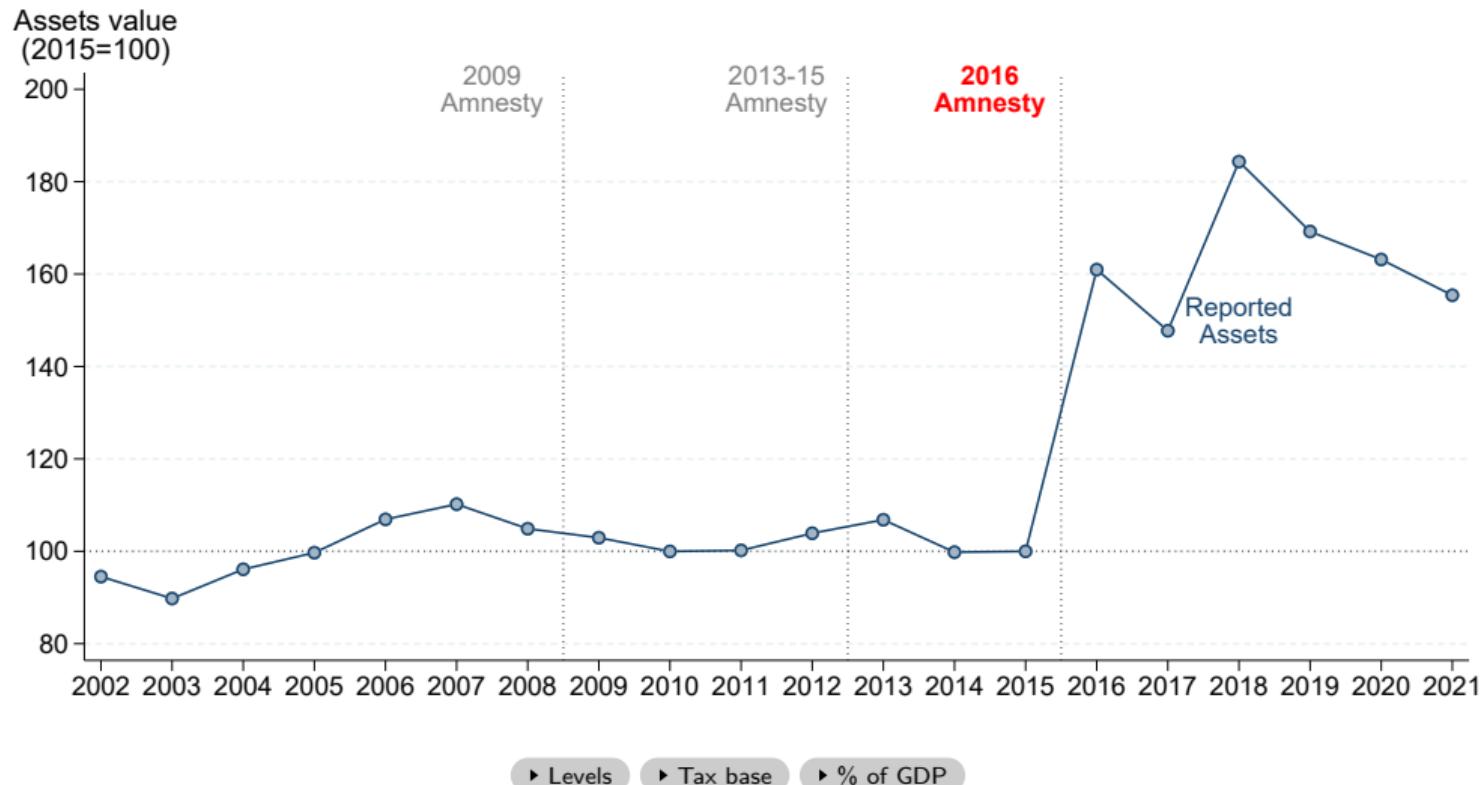
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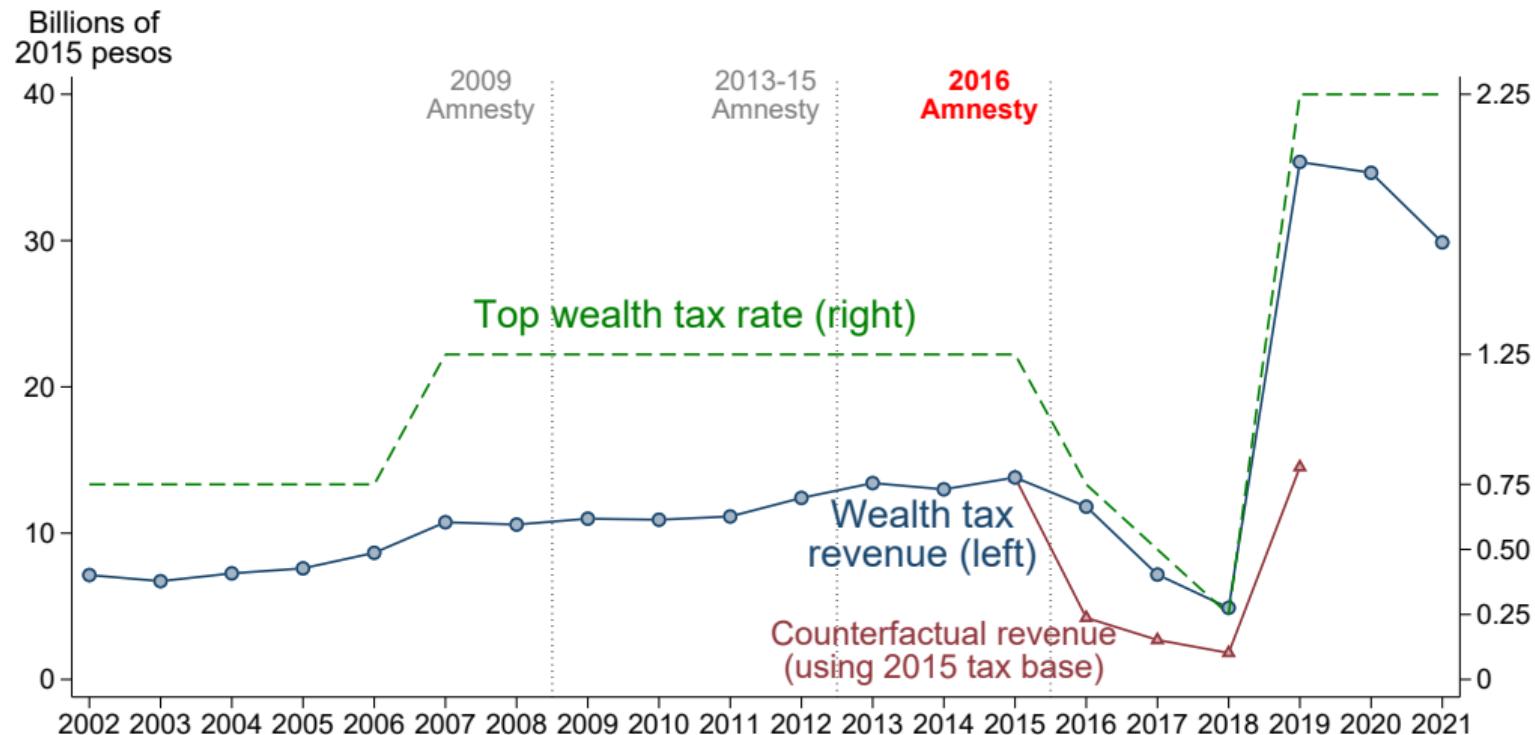
What made the 2016 amnesty different?

# The massive disclosures expanded Argentina's wealth tax base

As a result, wealth tax revenue has doubled since 2016



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



► Schedule

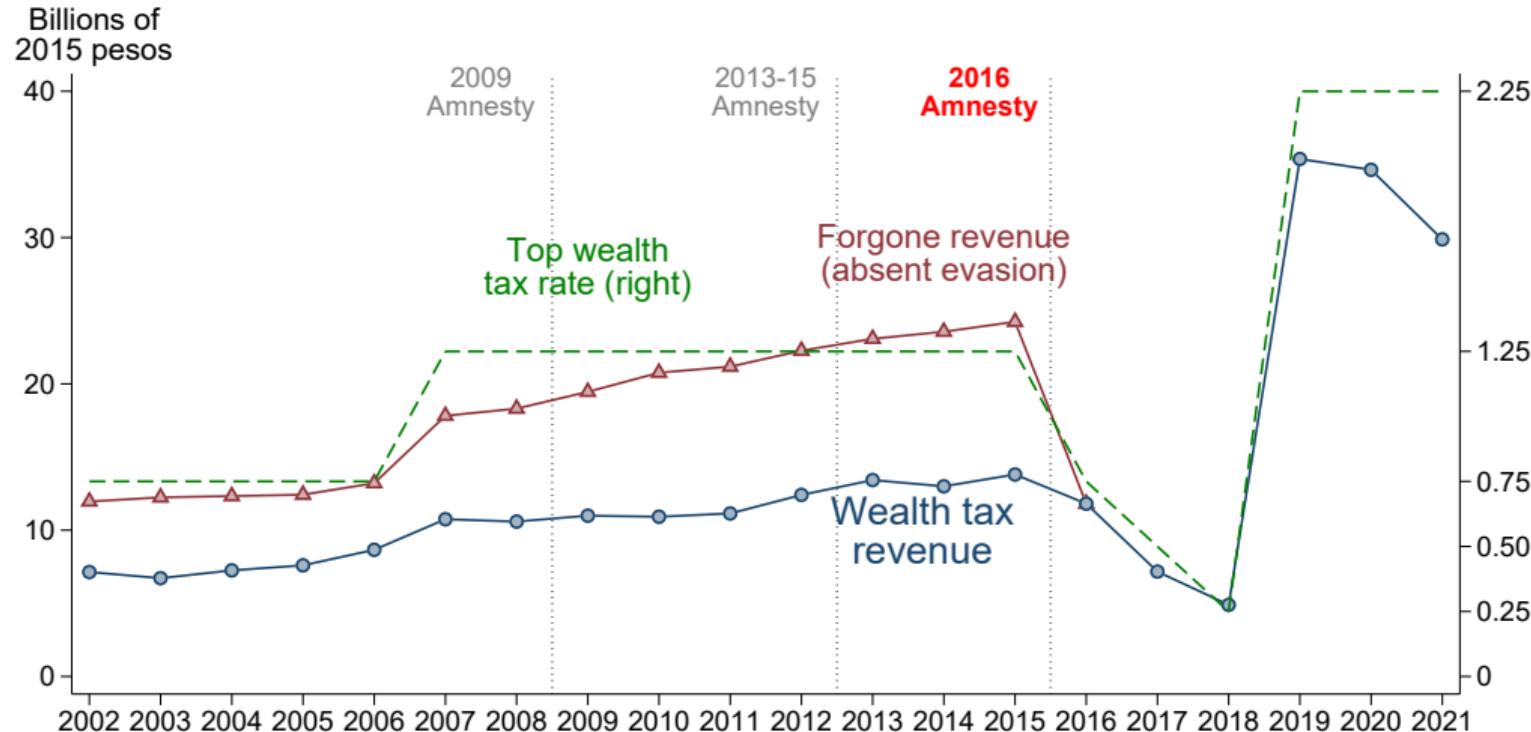
► % GDP

► ATR

► Good Compliers

► WT base

# Forgone WT revenue in 2002–15 → equivalent to amnesty's special tax



► Schedule   ► % GDP   ► ATR   ► Good Compliers   ► WT base

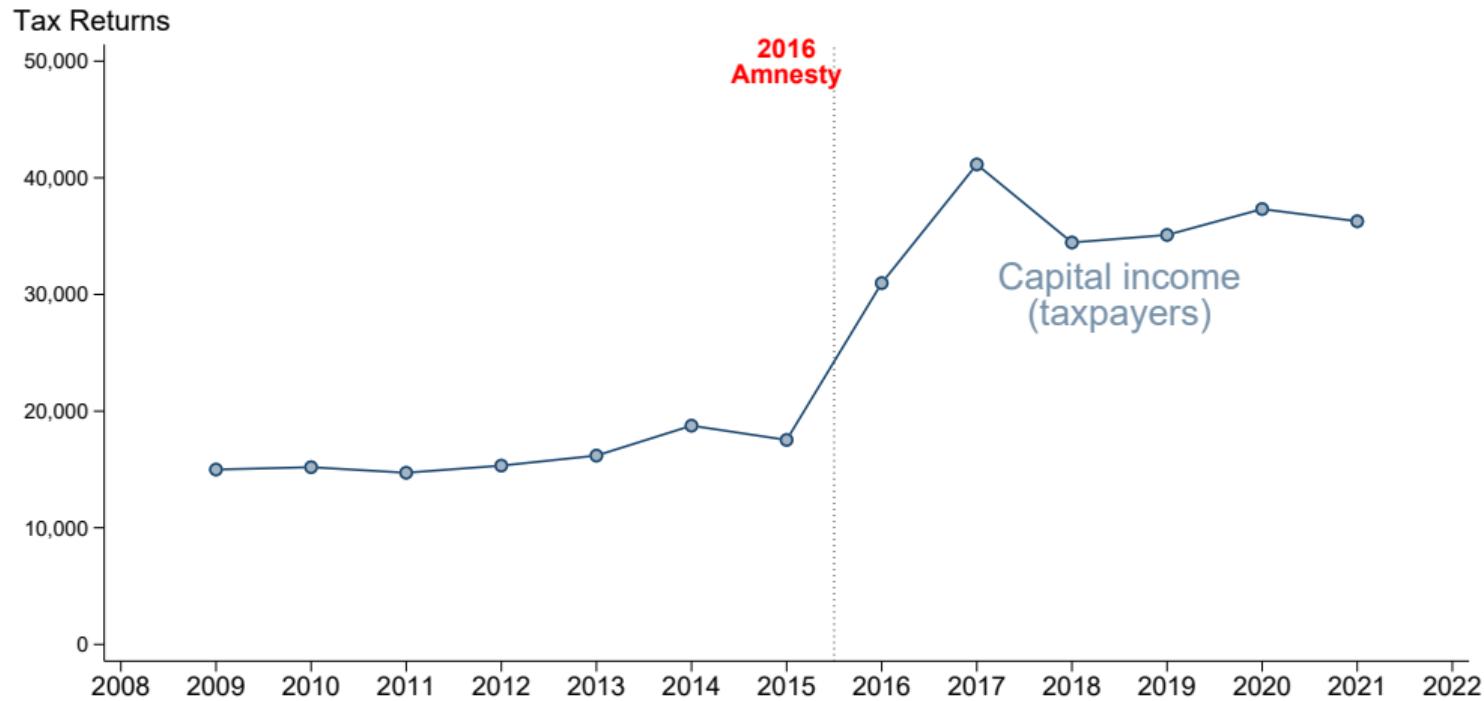
## The expanded wealth tax base was timely to deal with COVID-19 crisis

- ▶ Gov't levied a one-time wealth surtax in 2020 on the 12.5k wealthiest people. News: [\[1\]](#) [\[2\]](#)
  - MTRs of 2%-3.5% (domestic assets) and 3%-5.25% (foreign assets)
  - Earmarked for health expenses (e.g., medical supplies), subsidies for SMEs, welfare programs
- ▶ The increase in reported wealth enabled the gov't to raise revenue progressively — collecting 2x more revenue than absent the amnesty
  - ⇒ 10k people filed, with ≈ USD 80B in taxable assets (50% located abroad)  
*Reference: pre-amnesty taxable assets of wealthiest 10k ≈ USD 41B*
  - ⇒ Collected ≈ USD 2.66B (~80% of the projected revenue); ≡ 1 month of VAT revenue
  - ⇒ Non-filers were subject to higher audit rates

# Assets disclosures contributed to more capital income reported

N of taxpayers reporting capital income doubled

All sources

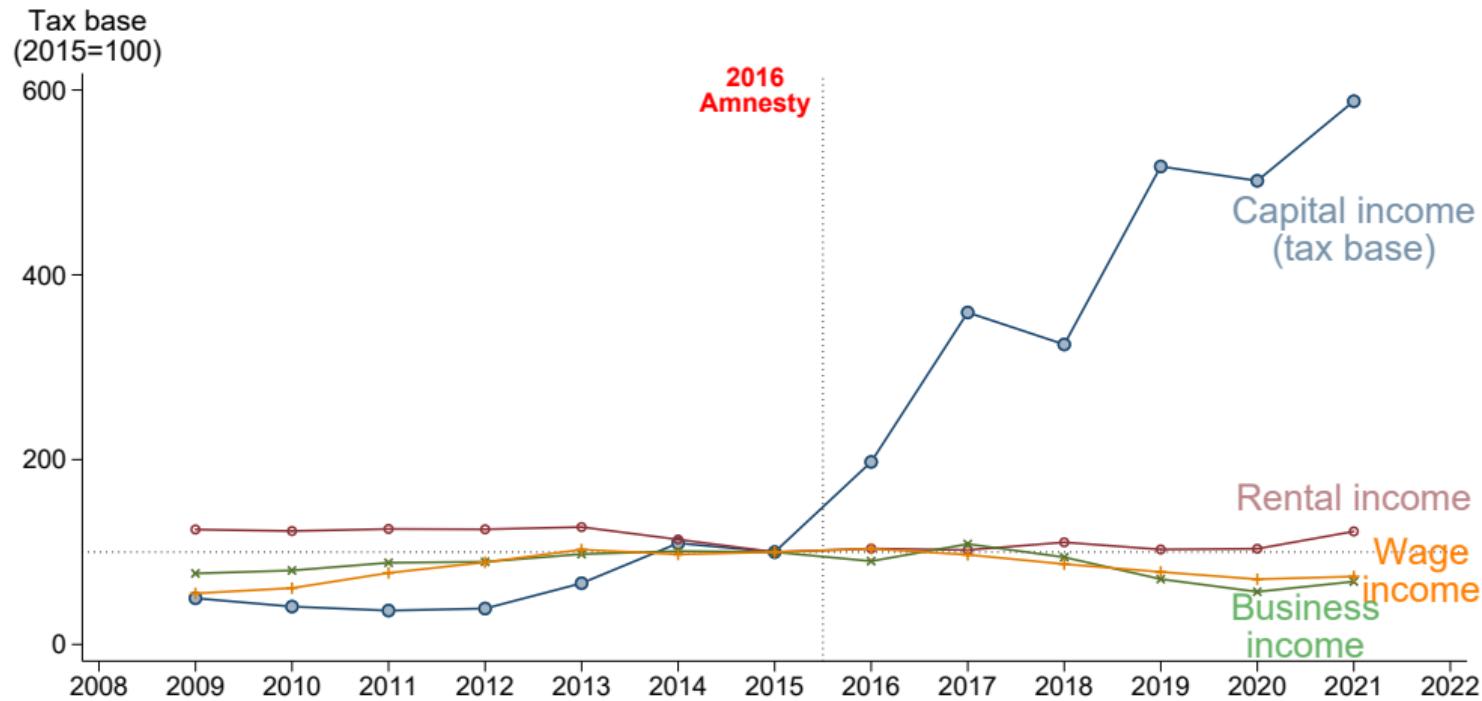


# Assets disclosures contributed to more capital income reported

Capital income tax base tripled—and the increase persisted

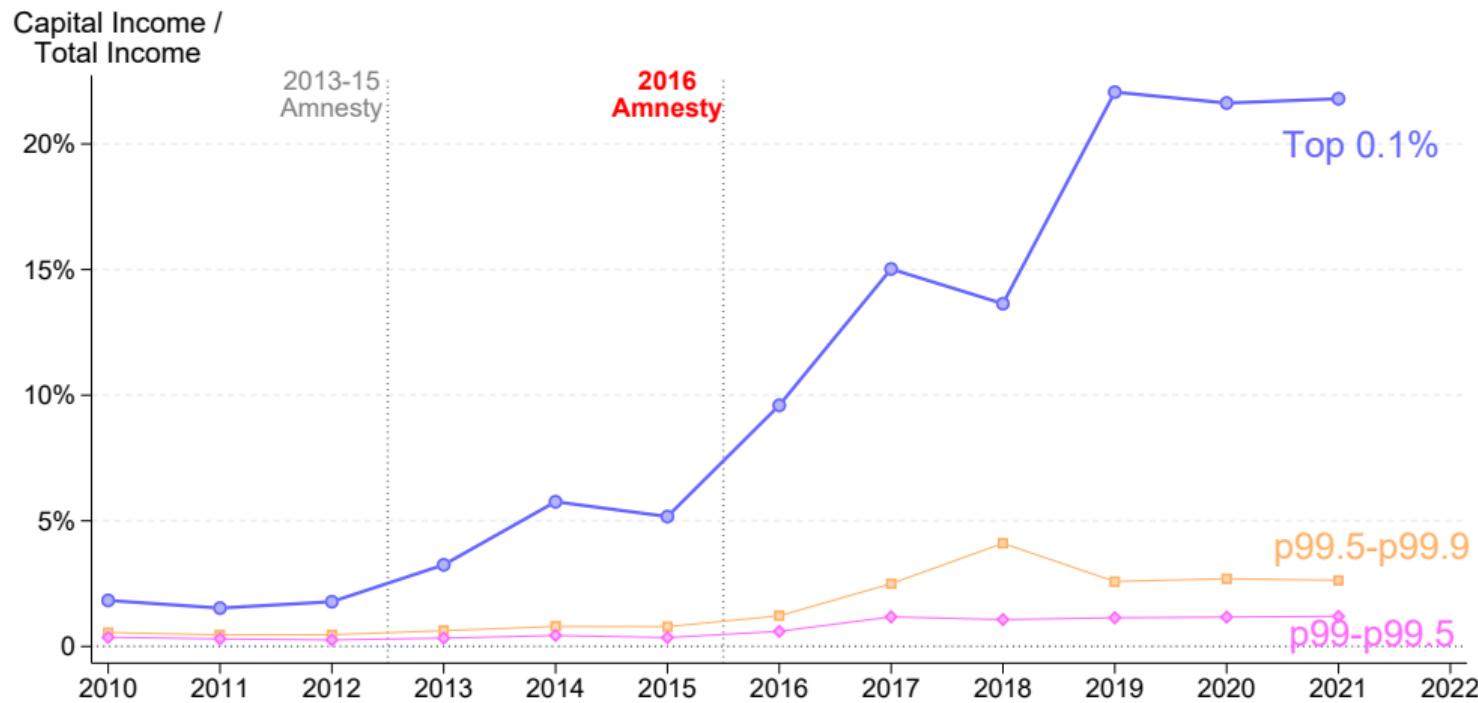
► Levels

► Shares

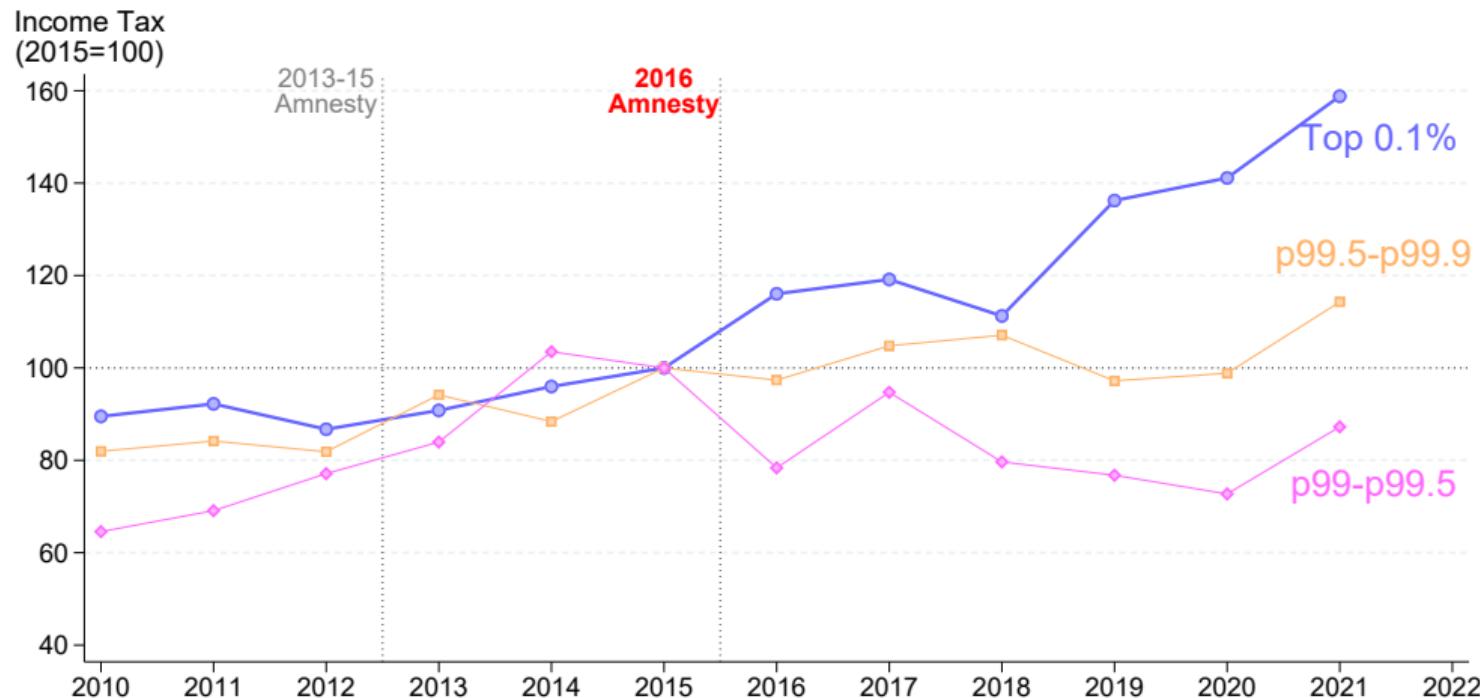


# Most capital income disclosures made by top 0.1%

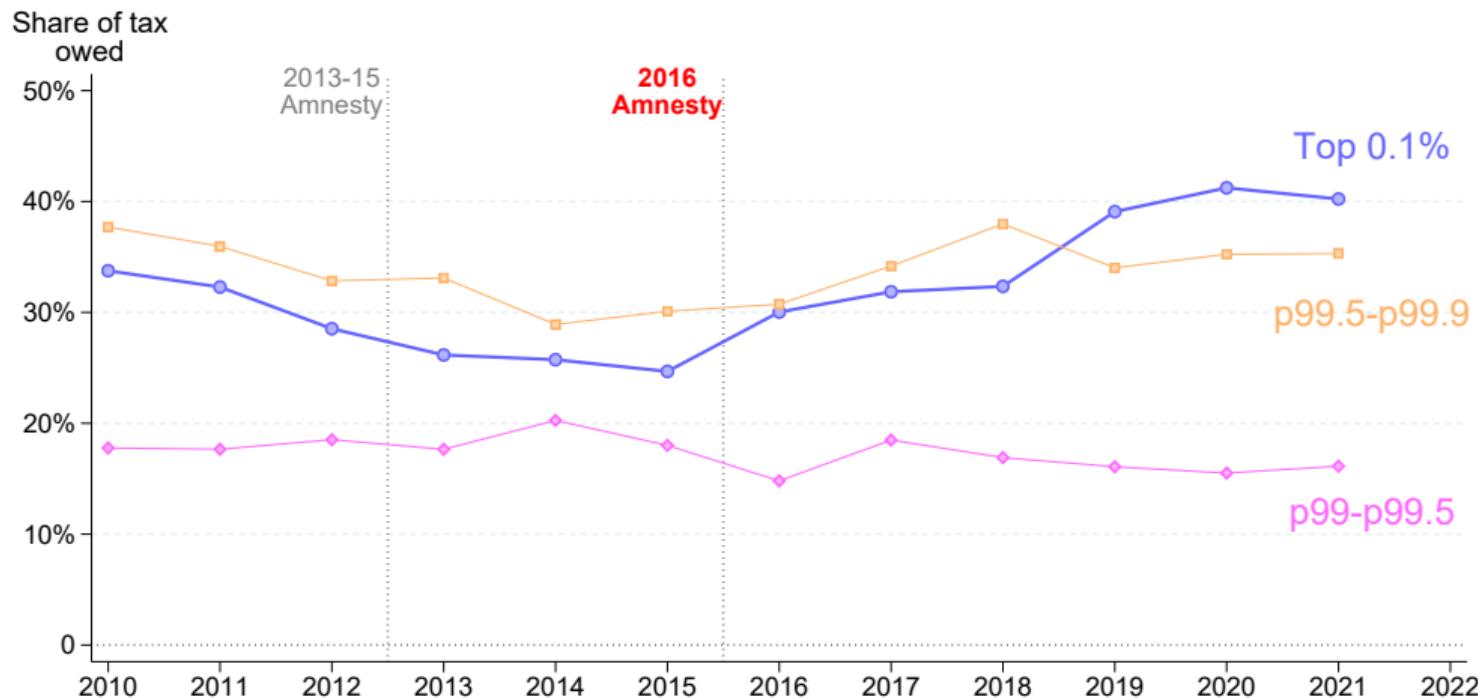
A remarkable increase in the capital income share btw 2015-21



⇒ The income tax paid by the top 0.1% surged by 60% during 2015–21



⇒ Top 0.1% of income earners contribute a higher share of income taxes  
From 25% in 2015 to 40% in 2021



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Asset Revelations, Progressivity, and Revenue

Enduring Increases in Reported Wealth

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**Do Taxpayers Repatriate Assets in Response to Tax Incentives?**

What made the 2016 amnesty different?

## Limited response to sizable tax incentives for repatriation

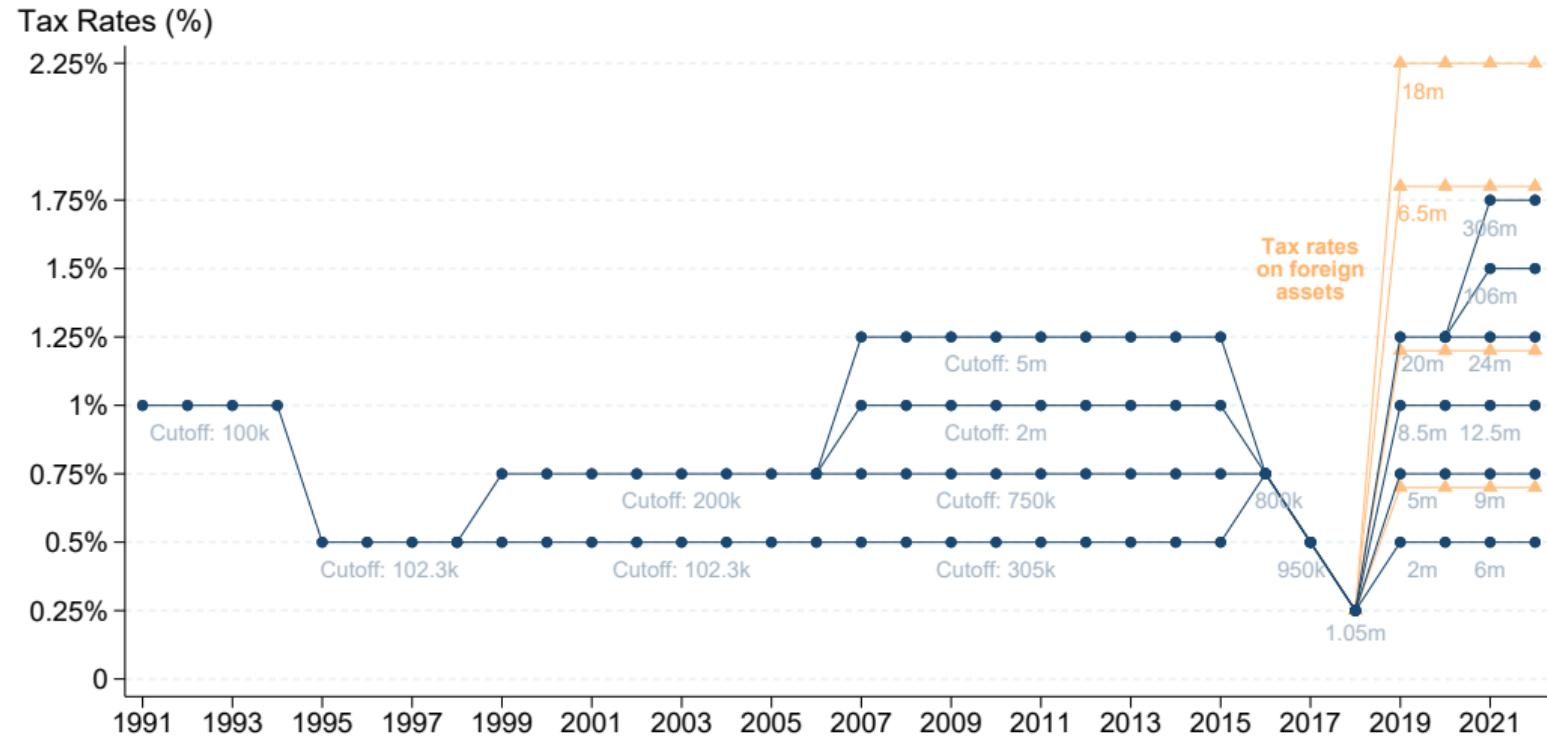
**Most Argentines kept their assets abroad, despite sizable tax incentives:**

1. Repatriation clauses embedded in the amnesty to bring capital back into the country  
→ 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  
→ Raised top wealth tax rate from 0.25% to 2.25%

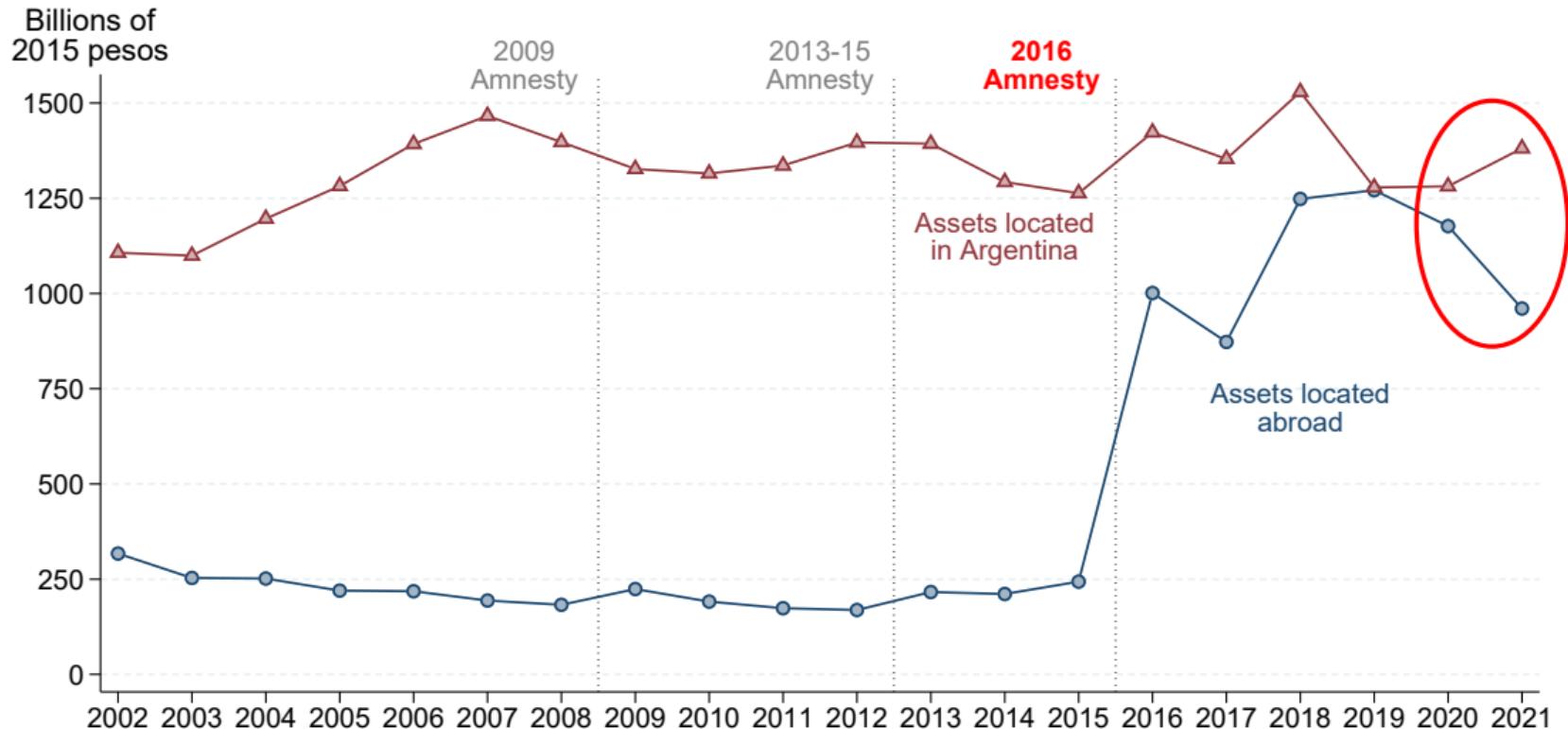
► **Suggests that taxation is not the primary motive to hold assets abroad**

- Might be to insure against economic volatility, currency controls, ER fluctuations, inflation spells, and to obtain higher returns

## New adm imposed higher (confiscatory?) tax rates on foreign assets in 2019



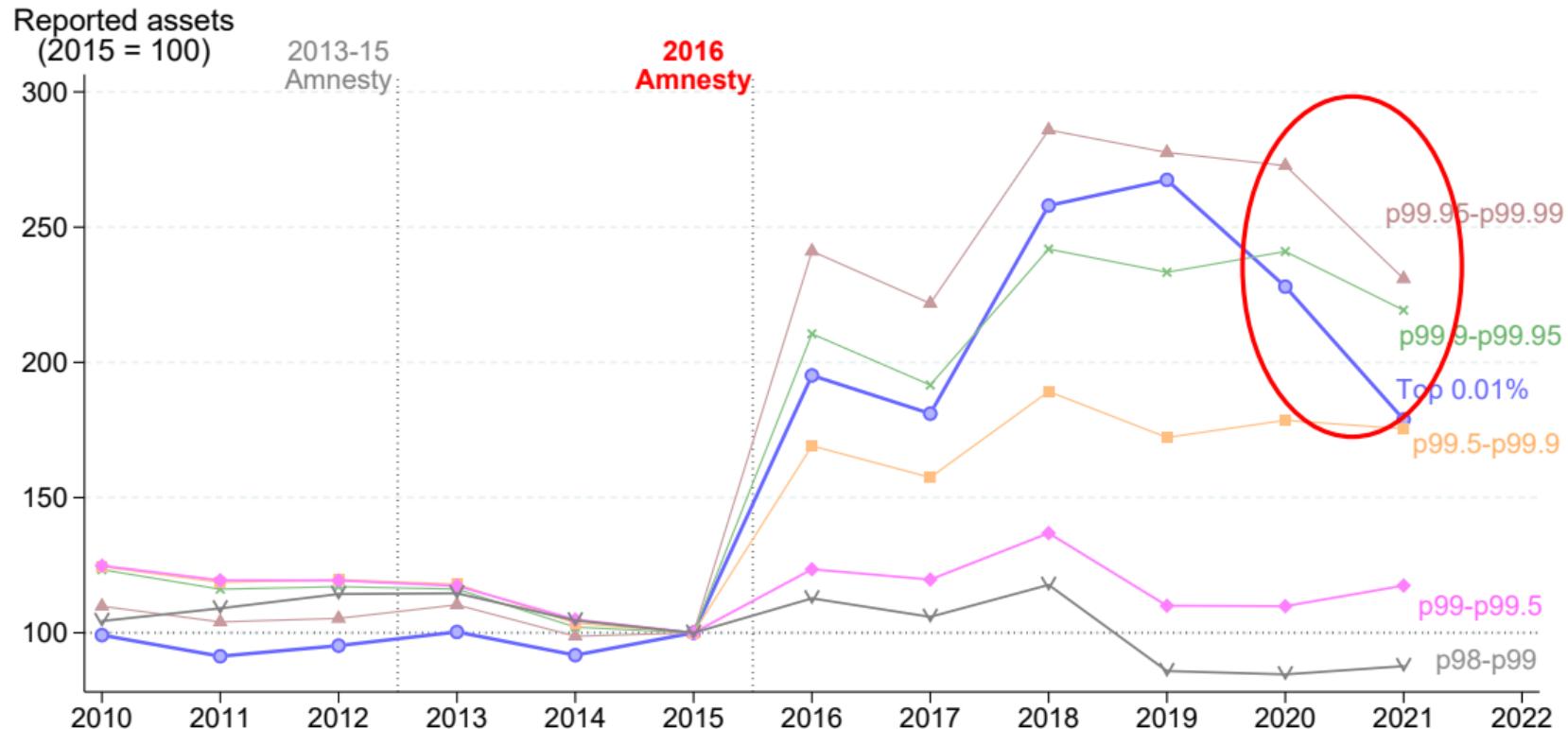
## Some evidence of asset repatriation and fewer declarations in 2021



# Reduction in total wealth primarily stems from the top 0.1%

► ETR

► Rev-GDP



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What made the 2016 amnesty different?

## Features of Macri's 2016 tax amnesty

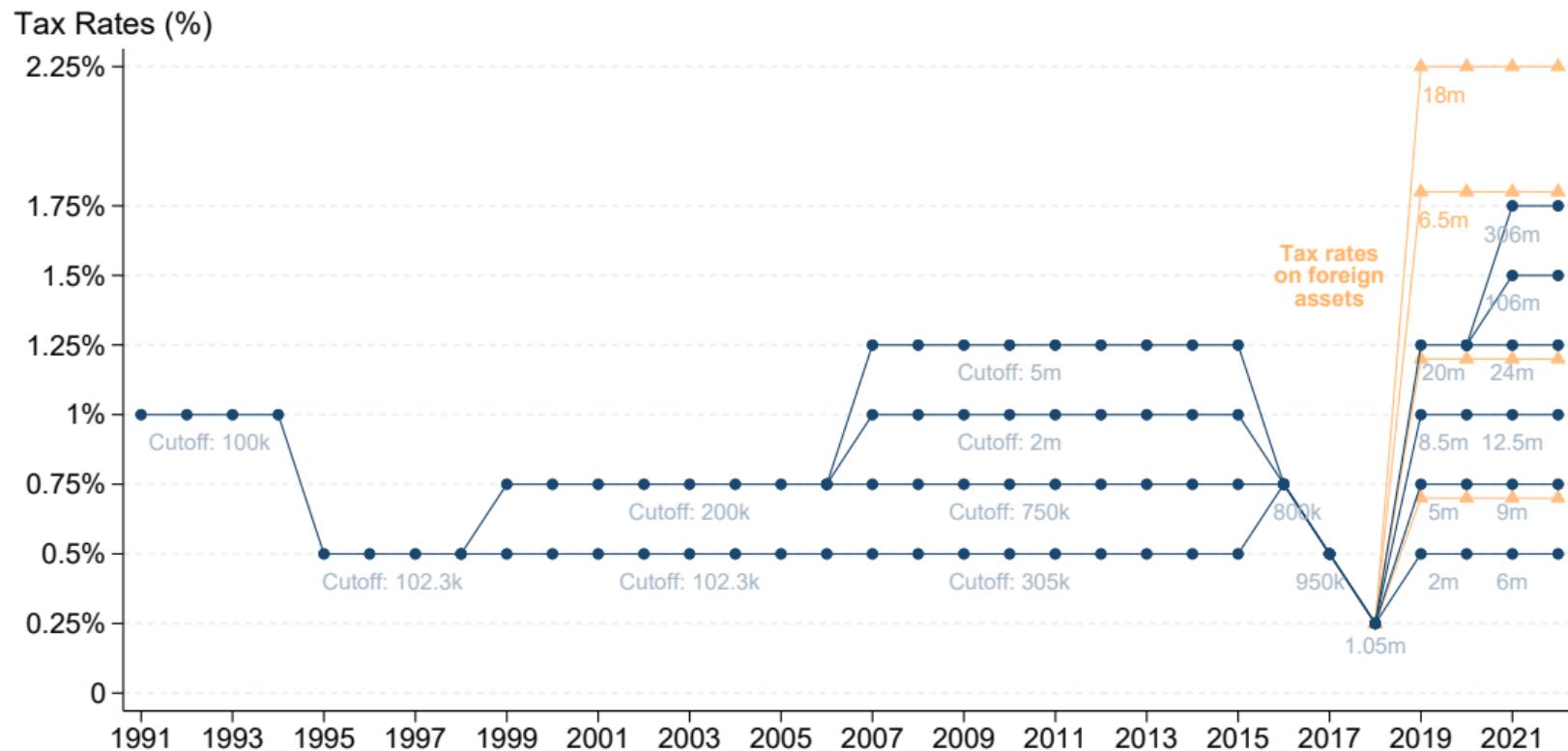
1. **Scope:** all (foreign and domestic) assets and currencies as of July 22, 2016.  
In place for nine months (Aug '16–March '17)
2. **Tax and non-tax benefits:** forgave tax liabilities & fines + no criminal prosecution  
Pre-amnesty, penalty for evasion was 2–10X taxes evaded + imprisonment
3. **Costs:** 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 save 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**

# Wealth tax rates dropped from 1.25% in 2015 to 0.25% in 2018

► Table ► Revenue ► Features ► ATR ► N payers ► Bunching



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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

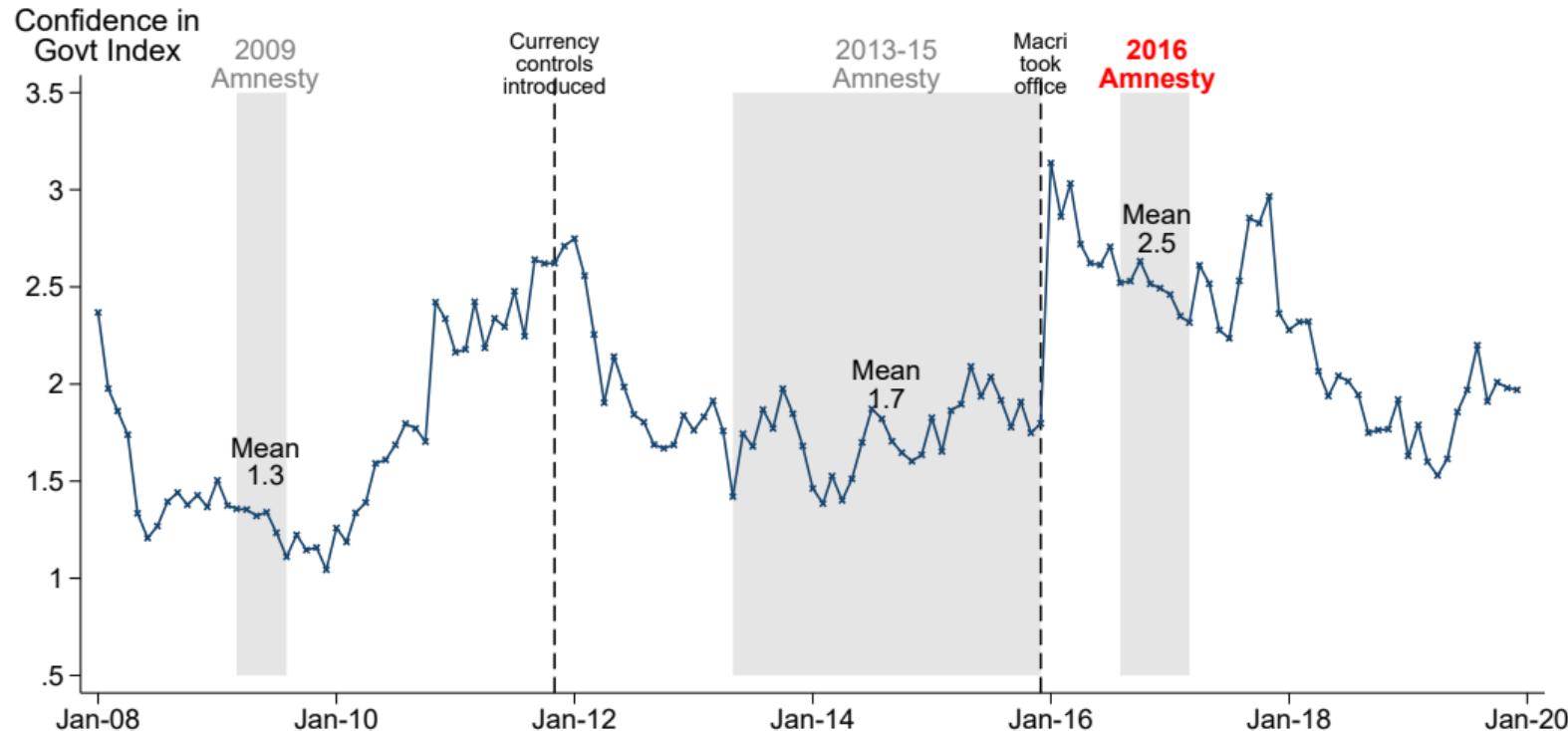


Source: Slide taken from AFIP's communication campaign.

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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 ➔



The ad translates to:

*Tax Amnesty*

*Declaration of assets*

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

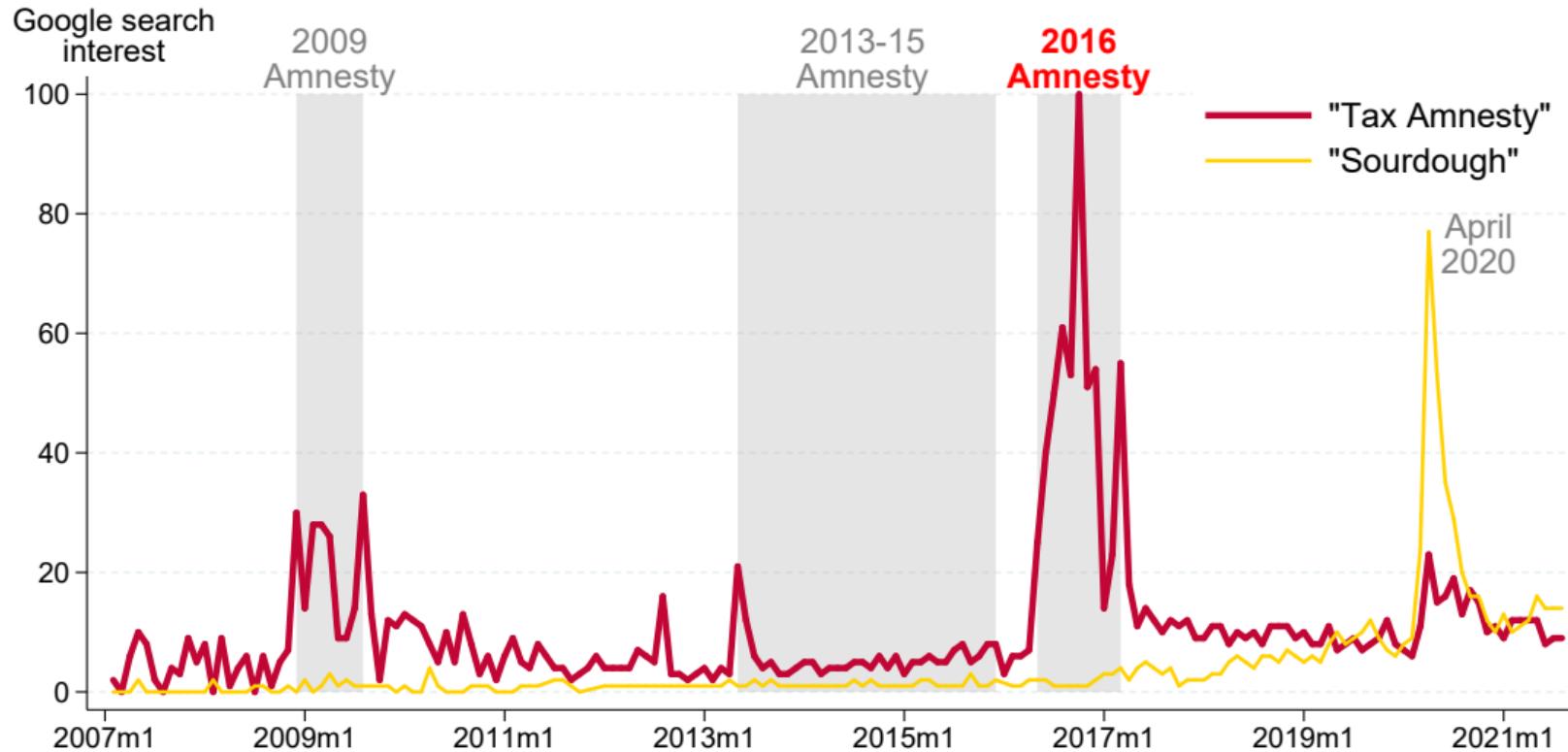
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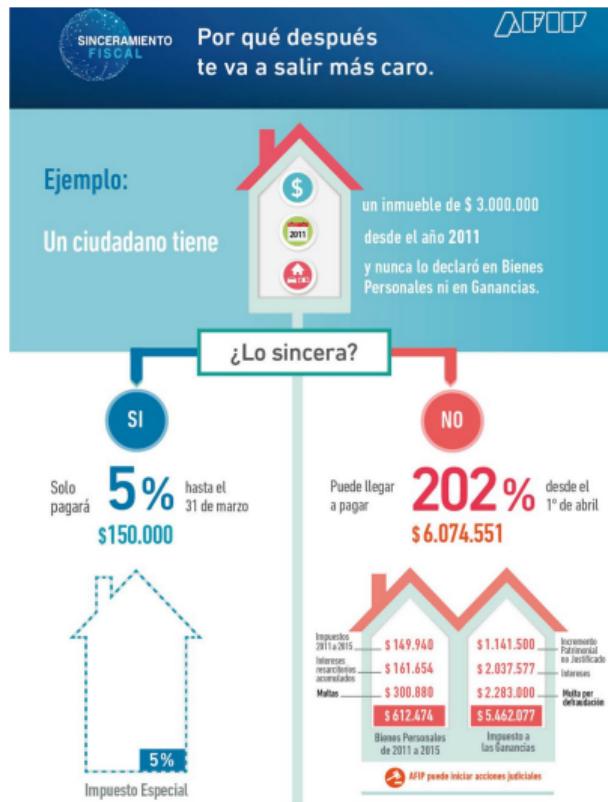
## Visibility: amnesty banners at the entrance of IRS's headquarters



# 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

The screenshot shows the official website of the Administración Federal de Ingresos Públicos (AFIP). The top navigation bar includes the AFIP logo and links for IMPOSITIVA, ADUANA, and SEGURIDAD SOCIAL. The main banner features a large image of modern office buildings and the text "SINCERAMIENTO FISCAL CÓMO DECLARAR BIENES". Below this, a purple box states: "CONOCÉ EN ESTE VIDEO-TUTORIAL EL PASO A PASO PARA INCLUIR TUS BIENES AÚN NO DECLARADOS Y GOZAR DE LOS BENEFICIOS." To the right, a blue-themed digital interface titled "Acceso con CLAVE FISCAL" offers options like "INGRESAR", "SOLICITAR CLAVE", "¿OLVIDÓ SU CLAVE?", "CONSEJOS DE SEGURIDAD", and "AYUDA". At the bottom left, there's a "CLAVE DEL DÍA" section with a circular graphic, the text "SINCERAMIENTO FISCAL", and a message about declaring assets worth over \$800,000. It also includes a "ENTERATE" link. On the right, a "PARA DEPOSITAR EL EFECTIVO A DECLARAR" section features a countdown timer: "Te quedan: DÍAS 44, HORAS 06, MIN 27, SEG 36".

## 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

- ▶ **Substantial disclosures of offshore assets can take place in the current landscape of global tax coordination**  
⇒ even in a country with a lot at stake and a history of unsuccessful amnesty programs
- ▶ **Policy takeaway:** amnesties must be accompanied by additional enforcement measures, well-structured tax incentives, and robust ad efforts to max participation
- ▶ **Will our results replicate in other countries or even a future Argentina?**

# Thanks!

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## Summary of main results

1. Enduring increase in reported wealth: # of people declaring foreign assets tripled in 2016 and declared foreign assets quadrupled; evasion concentrated among top 0.1%
2. Sizable externalities on capital taxes and social transfers
  - Wealth and capital income tax bases more than doubled even 5 years later
  - Amnesty's one-time penalty recouped *all* WT revenue lost due to evasion since 2002
  - Earmarked revenue boosted pension benefits by 15% 
3. Reported wealth of the top 0.1% experienced substantial growth
  - Report >2x as many assets 5 years later (added effect: income tax paid ↑ 60%)
4. New adm in 2019 raised revenue/ETR by levying higher tax rates on foreign assets
  - Some people at the top 0.1% opt to conceal assets again and/or repatriate a portion
  - For the majority, taxation is not the primary motive to hold assets abroad

## Key question: **How many (undclared) assets are at stake?**

Has the situation worsened since the 2016 amnesty?

- ▶ Can be proxied via the BoP, International Investment Position (INDEC)
  - ▶ Foreign assets of Argentine people and companies outside the local system (may or may not be declared to AFIP)
- ▶ Own ‘back-of-the-envelope’ calculation as of 2023-Q3:
  - ▶ A sizable pool of assets remains out of the local system
  - ▶ Confounder: CRS AEOI operative since Sep'17 (FY 2016)
  - ▶ In all, hidden assets at stake might still be substantial

## Assets disclosed in the 2016 amnesty

Asset type	Value (mill USD)	%	% GDP
Investments—Abroad	54,999	47	9.9
Investments—in Arg	860	1	0.2
Cash deposits—Abroad	25,925	22	4.7
Cash deposits—in Arg	405	0	0.1
National/foreign currency—in Arg	7,344	6	1.3
Real Estate—Abroad (57k prop)	10,124	9	1.8
Real Estate—in Arg (110k prop)	10,434	9	1.9
Rest of Assets (vehicles, art, jewelry, etc)	6,685	6	1.2
<b>Total</b>	<b>116,775</b>	100	21

“Cash stashed under the mattress”:

- INDEC 2016-Q4: USD 153 bn
- Disclosed in 2016 amnesty: USD 33 bn
- INDEC 2023-Q3: USD 253 bn

⇒ +100 bn dollars

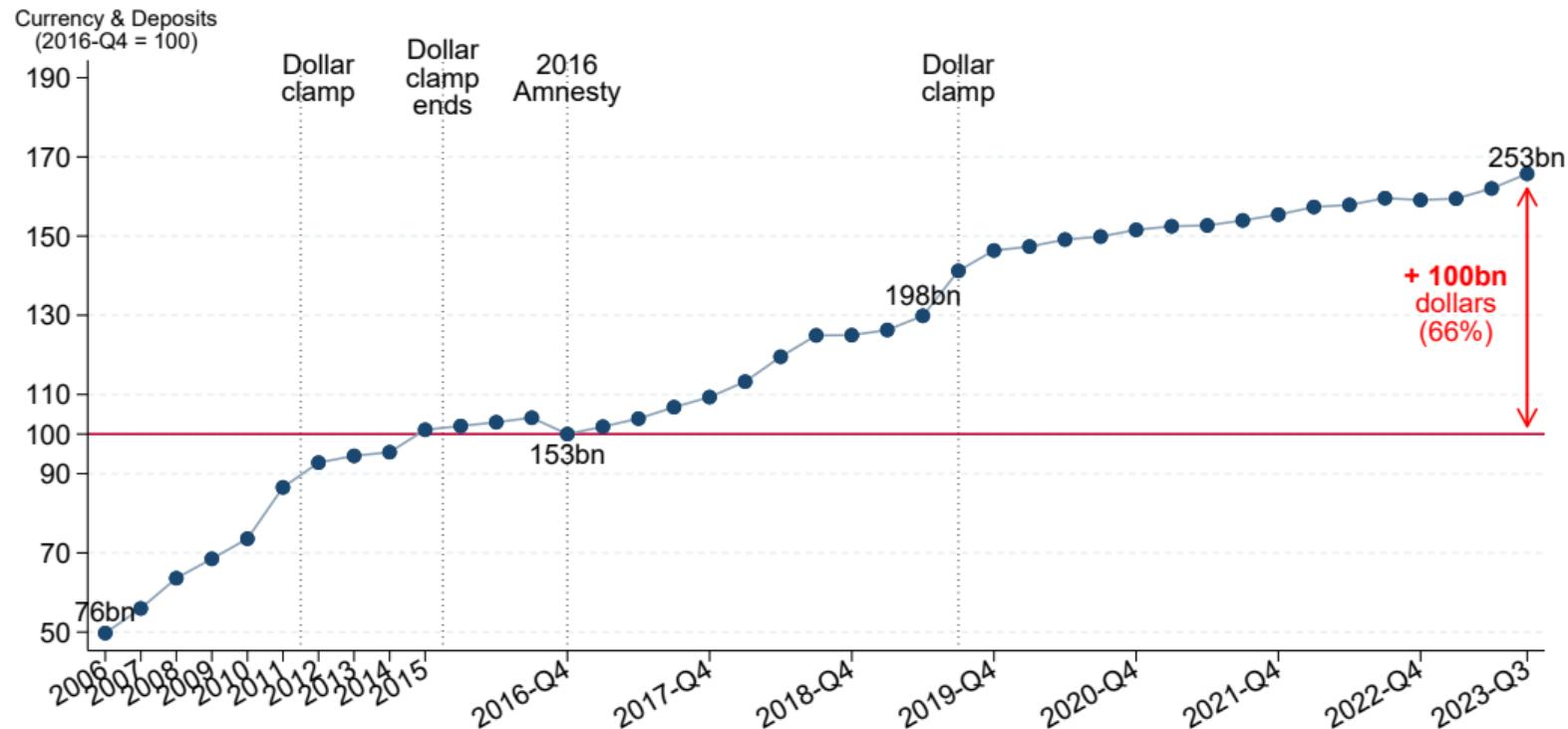
Portfolio investments:

- INDEC 2016-Q4: USD 44 bn
- Disclosed in 2016 amnesty: USD 55 bn
- INDEC 2023-Q3: USD 84 bn

⇒ +40 bn dollars

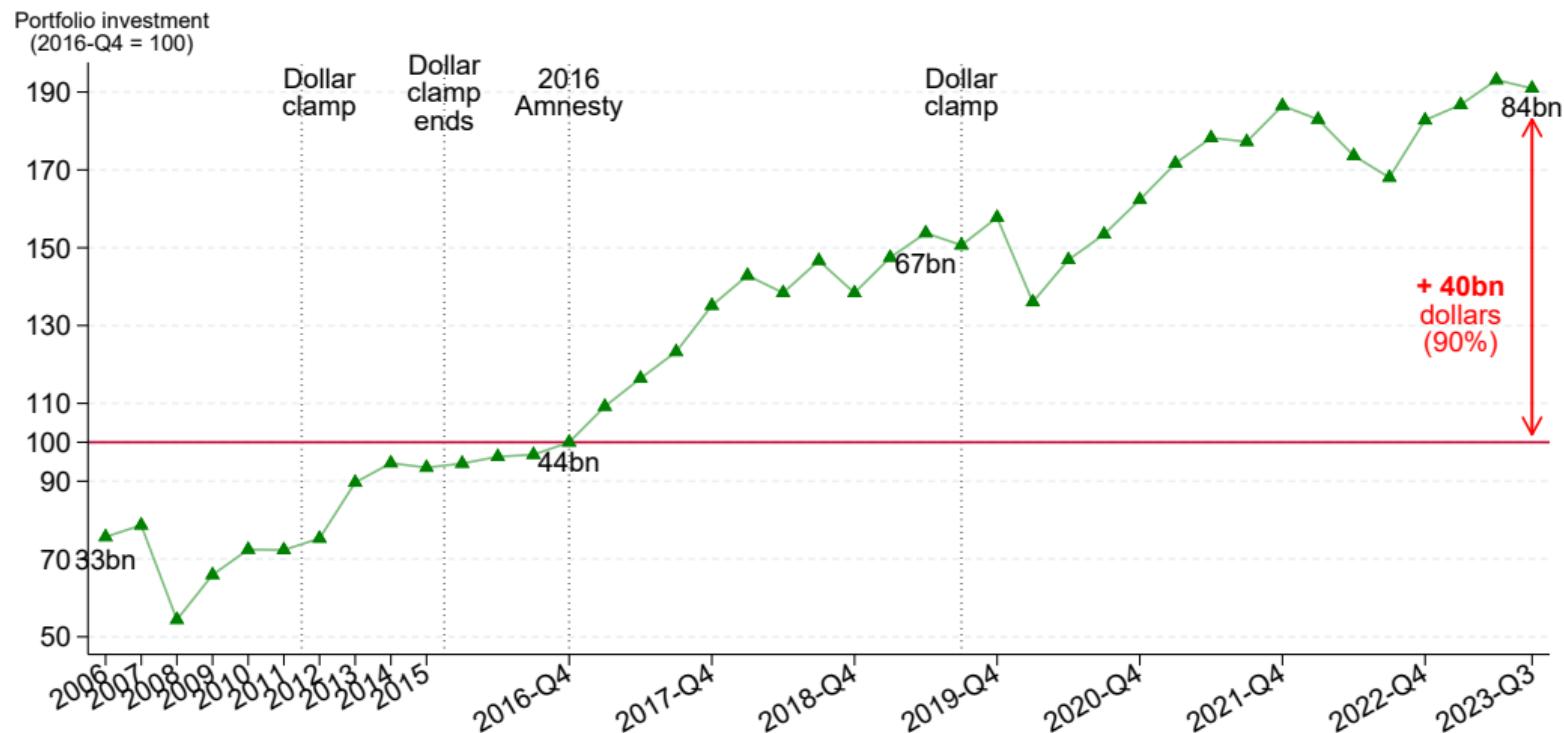
# Foreign Currency and Deposits

“Cash stashed under the mattress”



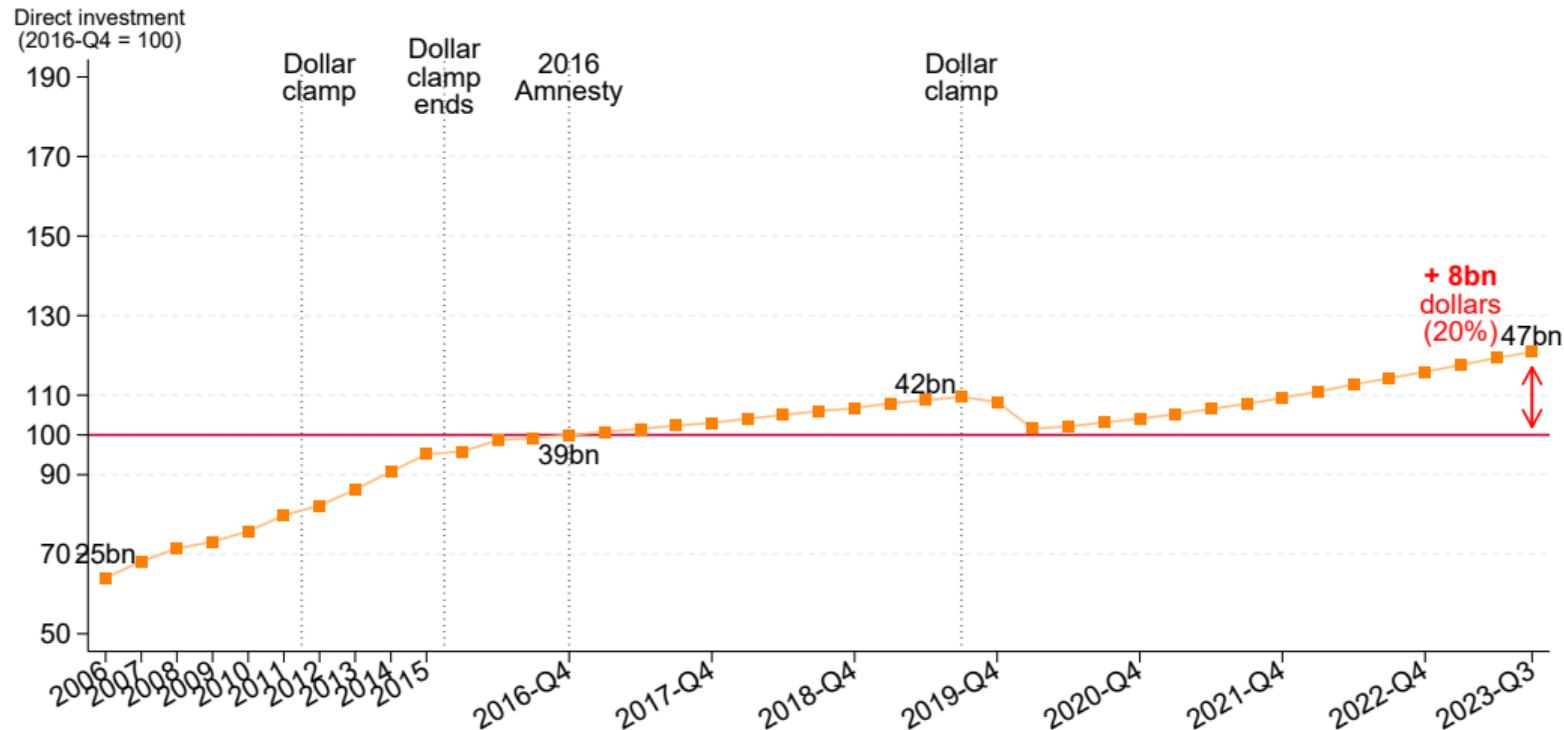
# Portfolio investments

Securities, shares, and other financial assets



# Direct investments

## Properties and other physical assets



# Growing international scrutiny on offshore wealth

Statistics of information exchange under the CRS standard as of 12/31/2022

Fiscal Year	CRS				CRS vs Wealth Tax Returns	
	Relaciones activadas para el intercambio	Paises emisores	Saldo total de las cuentas (mill pesos)	Total de cuentas	Saldo CRS / Saldo WT	Saldo CRS / dinero + acciones WT
(1)	(2)	(3)	(4)	(5)	(6)	
2016	46	38	119,522	52,896	0.09	0.11
2017	86	76	809,229	257,991	0.55	0.66
2018	96	87	3,512,511	608,519	1.18	1.40
2019	100	86	6,122,735	643,472	1.34	1.55
2020	103	94	7,673,523	667,364	1.32	1.52
2021	108	95	8,720,640	727,428	1.29	1.48

Source: Own elaboration based on AFIP.

## So... how many (undclared) assets are at stake?

- ▶ Can be proxied via the BoP, International Investment Position (INDEC)
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  - ▶ **In all, hidden assets at stake might still be substantial**

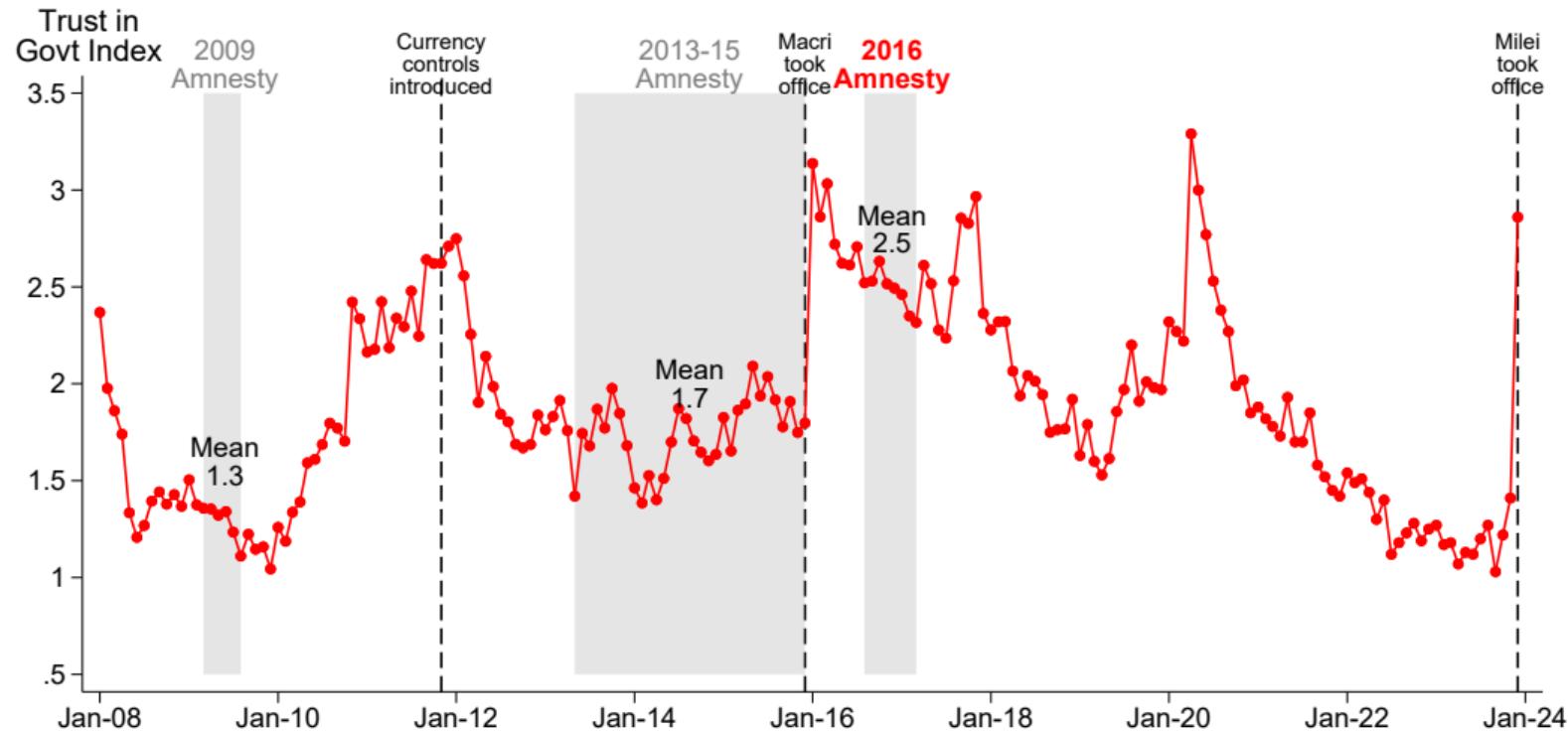
## Discussion: Features of Milei's proposed amnesty

1. **Scope:** all (foreign and domestic) assets and currencies held as of Dec 31, 2023.
  - ▶ In place for 11 months (Jan to Nov 2024) split into 3 stages
  - ▶ Public officials (and family) excluded
2. **Benefits (tax and non-tax):** forgives tax liabilities & fines + no criminal prosecution  
Pre-amnesty penalty for evasion: 2–10X taxes evaded + imprisonment
3. **Costs:** one-time penalty with MTR of 5% on total (family) assets worth >100k dollars (MNI) disclosed by March'24
  - ▶ To encourage early participation, MTR jumps to 10%/15% after March/June'24
  - ▶ Participants can waive penalty by repatriating assets in a special account until Jan 1, 2026

## Discussion: Other essential features

1. Wealth tax benefits to entice participation and safe-keep tax morale?
  - ▶ **Schedule:**
    - MNI increases to 100m (USD 80k, USD 280k for house)
    - Tax rates gradually cut from 0.5%-1.75% to 0.25% by 2027
    - Surtax on foreign assets abolished
  - ▶ Shield regime: reduced rate of 0.75% for FY 2023–27 (pay 75% upfront) and 0.5% for 2028–38  
*Note: Credibility compromised after 2019 tax hike?*
  - ▶ Rewards non-participants (“cumplidores” FY 2020–22): lower MTRs (but not 0% as in 2016)
2. Is the threat of detection credible?
  - ▶ Current landscape of global tax coordination remains favorable (OECD's CRS)
  - ▶ AFIP is actively using CRS info to crack down on offshore evasion [link 1] [link 2] ▶
3. Is the political economy favorable?
  - ▶ Pro-market and business-friendly gov't
  - ▶ More uncertainty than in 2016 (currency controls still in-place)
  - ▶ Amnesty's revenue earmarked to recapitalize the Central Bank (reserves)
4. Will the ad campaign be aggressive and disclosure process simple?

# Citizens' trust in the government is going up again

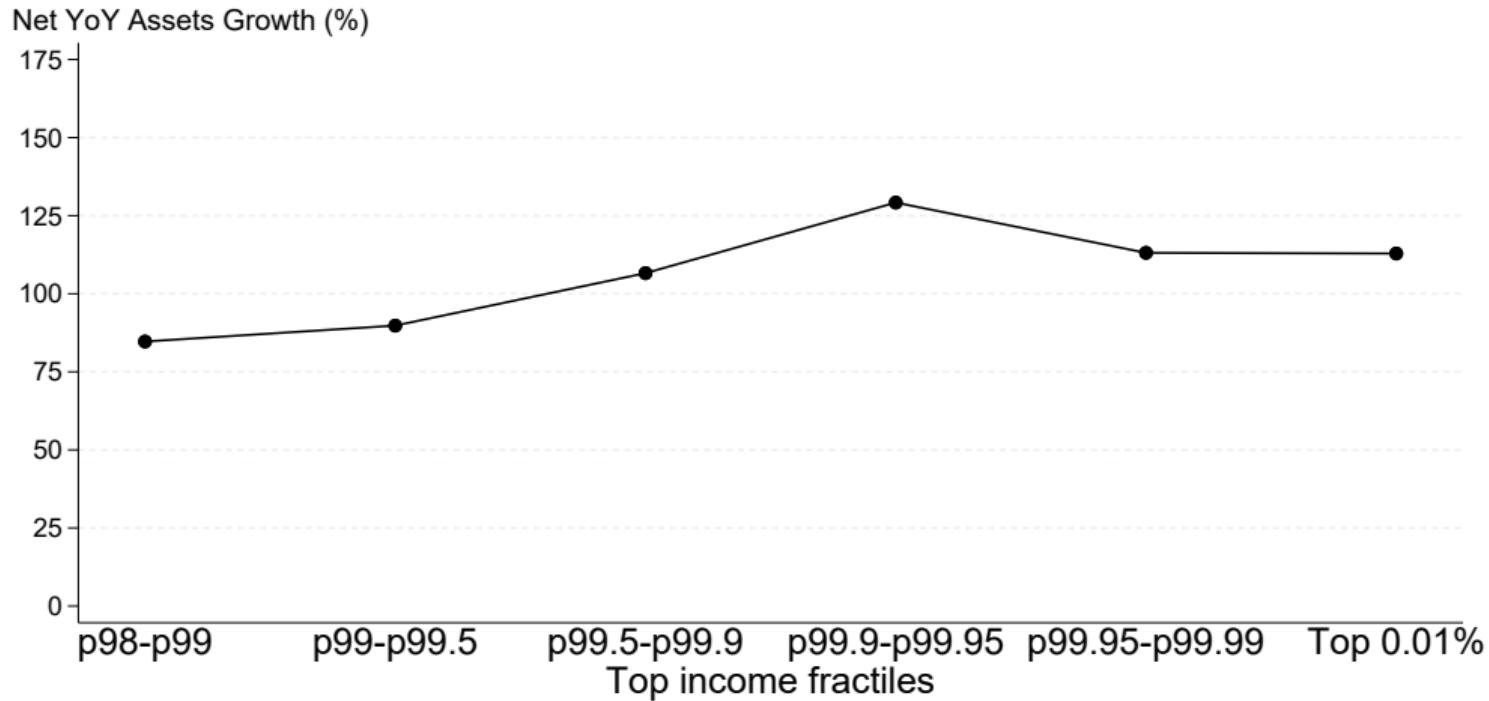


# Appendix

## Net asset growth between 2015 and 2016

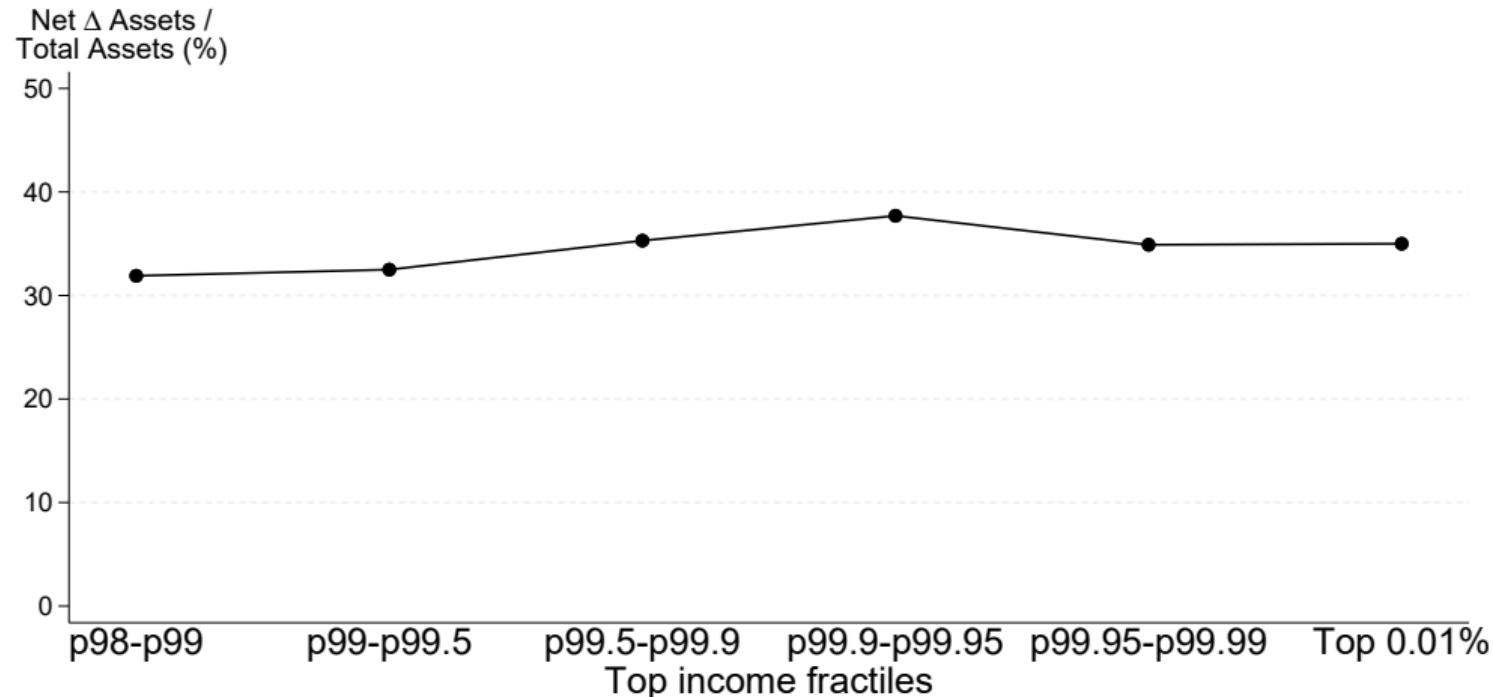
Back

Top 0.1% report to own 2x as many assets as before the scheme

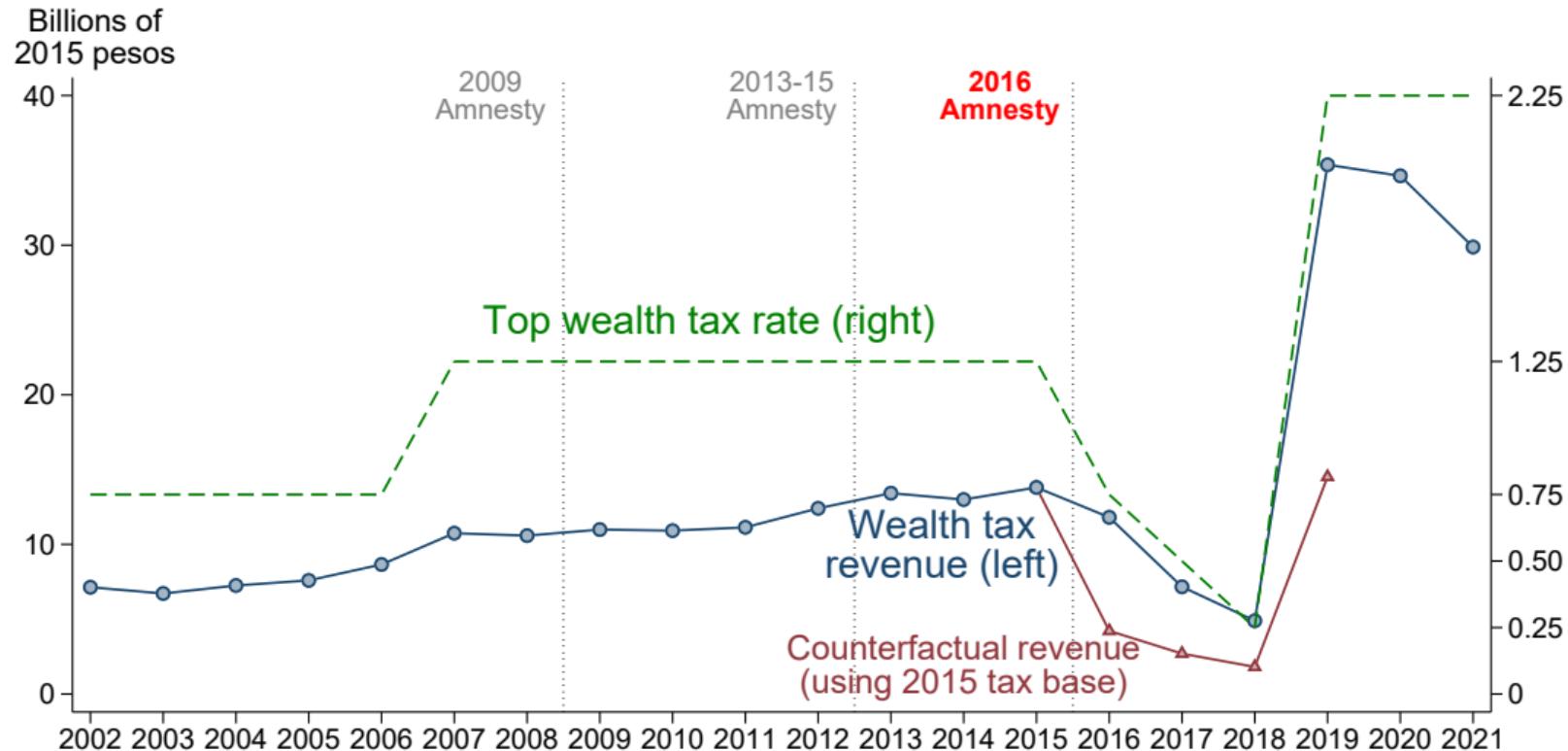


## Net asset change as a share of assets in 2016

Top 0.1% report roughly one-third more assets in 2016 than in 2015

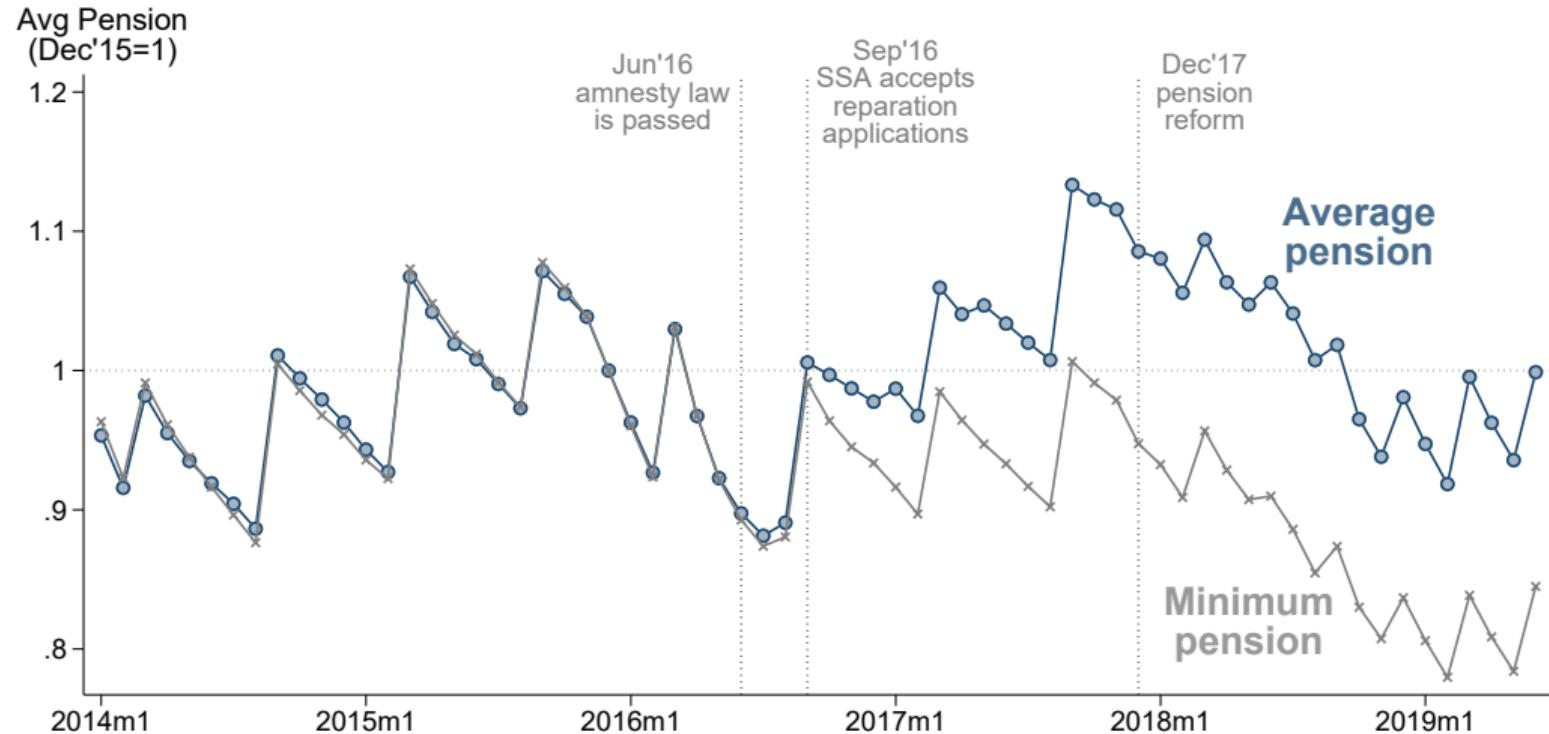


As a result, wealth tax revenue doubled—and tripled when tax rate ↑



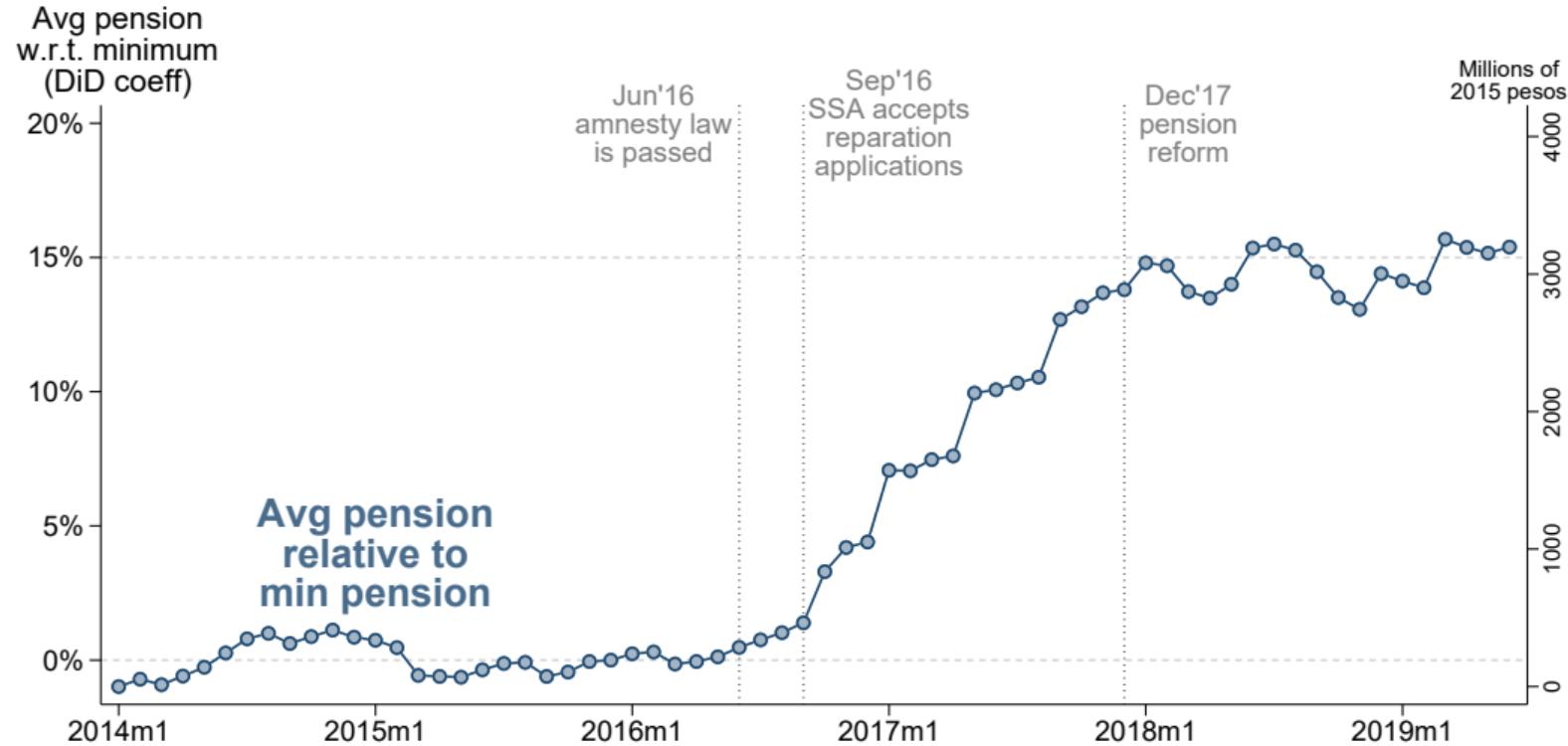
# By earmarking revenue, the amnesty raised pension benefits by 15%

▶ Back



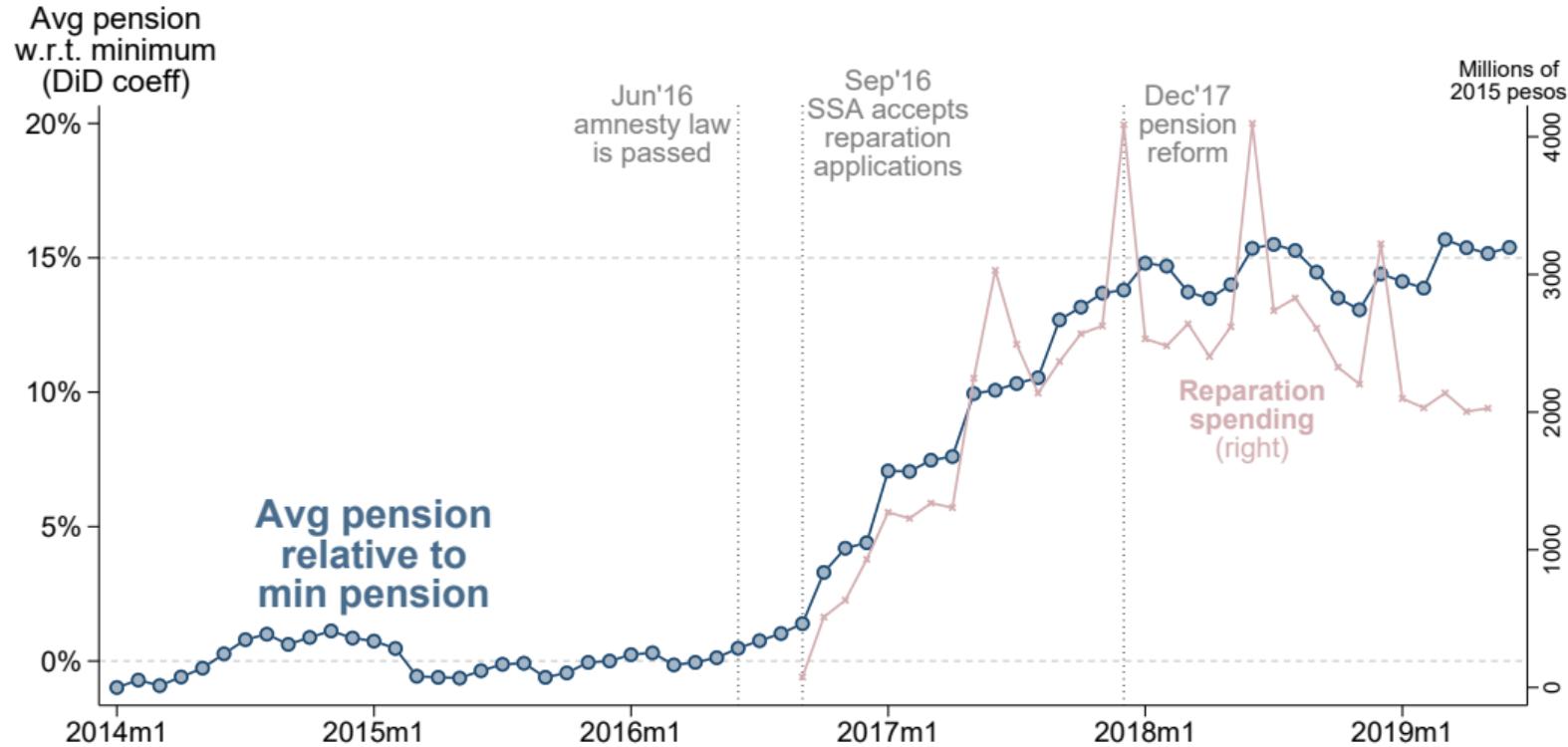
# By earmarking revenue, the amnesty raised pension benefits by 15%

▶ Back



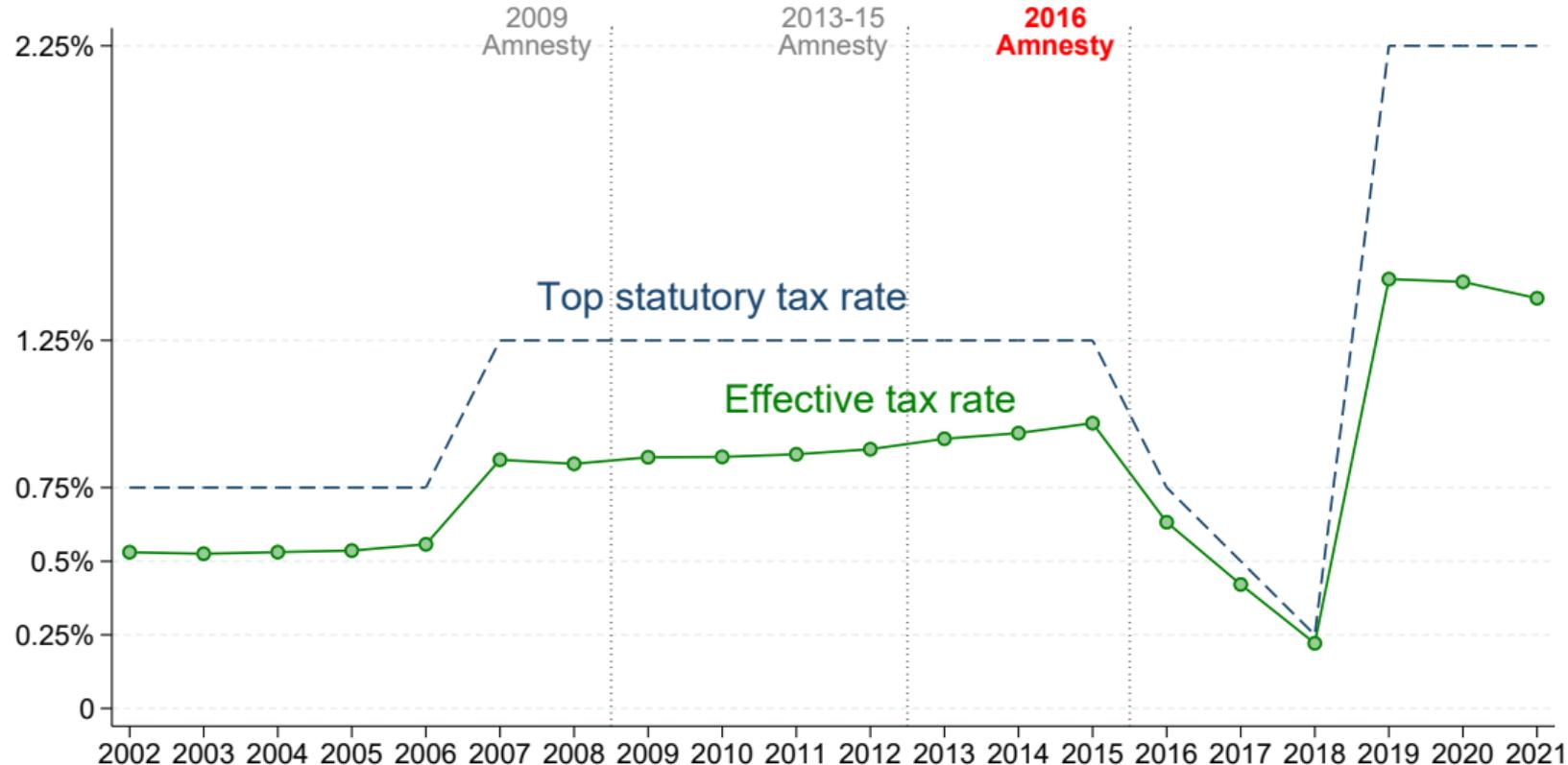
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▶ Back



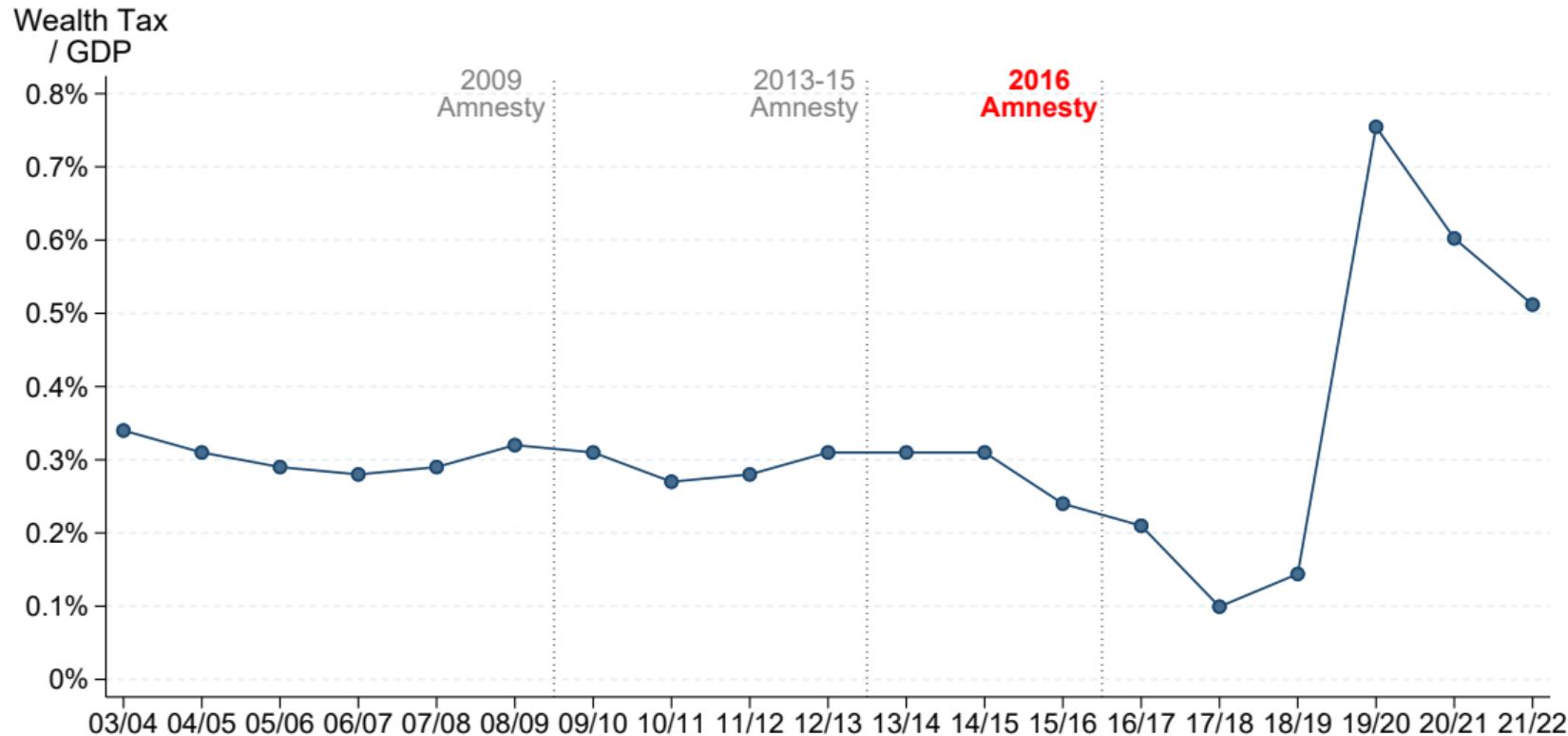
# And effective tax rate remains unchanged in 2019/20

▶ Back



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

Back



# Wealth Tax Form 762/A

► Back

 <b>IMPUESTO SOBRE LOS BIENES PERSONALES</b>  <b>F.762/A</b>	<b>Firma</b>  Sello fechador de recepción      Carácter	C.U.I.T. o C.U.I.L.      N° Verif.      Hora 20-22038809-4      156421      190127  Año      0 Orig. / 1-9 Rect.      Establecimiento 2011      Rectificativa I      0  Código de Actividad      Versión 851900      130000																																																												
Apellido y Nombre o Denominación: FREYRE, JOSE LUIS																																																														
Responsable por deuda ajena de: NO																																																														
<b>M1 – Bienes situados en el país</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>a</td> <td>Itmubles</td> <td>019</td> <td>0,00</td> </tr> <tr> <td>b</td> <td>Derechos reales</td> <td>020</td> <td>0,00</td> </tr> <tr> <td>c</td> <td>Automotores</td> <td>021</td> <td>31.900,00</td> </tr> <tr> <td>d</td> <td>Naves</td> <td>022</td> <td>0,00</td> </tr> <tr> <td>e</td> <td>Aeronaves</td> <td>023</td> <td>0,00</td> </tr> <tr> <td>f</td> <td>Patrón de emp. o explot. unipersonal, accionistas, cuotas, parti. soc. etc.</td> <td>035</td> <td>0,00</td> </tr> <tr> <td></td> <td>Acciones, cuotas, parti. soc. etc.</td> <td>180</td> <td>0,00</td> </tr> <tr> <td>n</td> <td>Títulos públicos y privados</td> <td>181</td> <td>0,00</td> </tr> <tr> <td>i</td> <td>Créditos</td> <td>028</td> <td>0,00</td> </tr> <tr> <td>j</td> <td>Depósitos en dinero</td> <td>078</td> <td>0,00</td> </tr> <tr> <td>k</td> <td>Dinero en efectivo</td> <td>029</td> <td>500,00</td> </tr> <tr> <td>l</td> <td>Bienes muebles registrados</td> <td>086</td> <td>0,00</td> </tr> <tr> <td>m</td> <td>Otros bienes</td> <td>030</td> <td>0,00</td> </tr> <tr> <td>n</td> <td>Bs. pers. y bs. muebles del hogar</td> <td>031</td> <td>1.620,00</td> </tr> <tr> <td><b>o</b></td> <td><b>TOTAL EN EL PAÍS</b></td> <td><b>132</b></td> <td><b>34.620,00</b></td> </tr> </table>			a	Itmubles	019	0,00	b	Derechos reales	020	0,00	c	Automotores	021	31.900,00	d	Naves	022	0,00	e	Aeronaves	023	0,00	f	Patrón de emp. o explot. unipersonal, accionistas, cuotas, parti. soc. etc.	035	0,00		Acciones, cuotas, parti. soc. etc.	180	0,00	n	Títulos públicos y privados	181	0,00	i	Créditos	028	0,00	j	Depósitos en dinero	078	0,00	k	Dinero en efectivo	029	500,00	l	Bienes muebles registrados	086	0,00	m	Otros bienes	030	0,00	n	Bs. pers. y bs. muebles del hogar	031	1.620,00	<b>o</b>	<b>TOTAL EN EL PAÍS</b>	<b>132</b>	<b>34.620,00</b>
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<b>M2 – Determinación del impuesto</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>a</td> <td>Total de bienes sujetos a impuesto</td> <td>914</td> <td>34.020,00</td> </tr> <tr> <td>b</td> <td>Mínimo exento</td> <td>108</td> <td>305.000,00</td> </tr> <tr> <td>c</td> <td>Diferencia</td> <td>353</td> <td>0,00</td> </tr> <tr> <td>d</td> <td>Alicuota del impuesto</td> <td>256</td> <td>0,00</td> </tr> <tr> <td>e</td> <td><b>IMPUESTO DETERMINADO</b></td> <td><b>264</b></td> <td><b>0,00</b></td> </tr> <tr> <td>f</td> <td>Total Bienes Exentos/No Alcanzados</td> <td>506</td> <td>120.414,18</td> </tr> </table>			a	Total de bienes sujetos a impuesto	914	34.020,00	b	Mínimo exento	108	305.000,00	c	Diferencia	353	0,00	d	Alicuota del impuesto	256	0,00	e	<b>IMPUESTO DETERMINADO</b>	<b>264</b>	<b>0,00</b>	f	Total Bienes Exentos/No Alcanzados	506	120.414,18																																				
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<b>M3 – Determinación del saldo de impuesto</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>a</td> <td>Impuesto determinado</td> <td>213</td> <td>0,00</td> </tr> <tr> <td>b</td> <td>Impuestos antiguos pagados en ext.</td> <td>161</td> <td>0,00</td> </tr> <tr> <td>c</td> <td>Total de anticipos cancelados con bonos o certificados fiscales</td> <td>1090</td> <td>0,00</td> </tr> <tr> <td>d</td> <td>Total de anticipo cancelados en efectivo o compensación</td> <td>689</td> <td>0,00</td> </tr> <tr> <td>e</td> <td>Pago a cuenta del Imp. s/Acc. y Part. S</td> <td></td> <td>0,00</td> </tr> <tr> <td>f</td> <td>Total de pagos a cuenta</td> <td>688</td> <td>0,00</td> </tr> <tr> <td>g</td> <td>Saldo a favor del periodo anterior</td> <td>583</td> <td>0,00</td> </tr> <tr> <td>h</td> <td>Saldo a favor del contribuyente</td> <td>683</td> <td>0,00</td> </tr> <tr> <td>i</td> <td>Saldo a favor AFIP</td> <td>683</td> <td>0,00</td> </tr> <tr> <td>j</td> <td>Saldo a favor anticipos cancelados con Bonos o Certificados fiscales</td> <td>1001</td> <td>0,00</td> </tr> </table>			a	Impuesto determinado	213	0,00	b	Impuestos antiguos pagados en ext.	161	0,00	c	Total de anticipos cancelados con bonos o certificados fiscales	1090	0,00	d	Total de anticipo cancelados en efectivo o compensación	689	0,00	e	Pago a cuenta del Imp. s/Acc. y Part. S		0,00	f	Total de pagos a cuenta	688	0,00	g	Saldo a favor del periodo anterior	583	0,00	h	Saldo a favor del contribuyente	683	0,00	i	Saldo a favor AFIP	683	0,00	j	Saldo a favor anticipos cancelados con Bonos o Certificados fiscales	1001	0,00																				
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<b>M4 – Saldo a pagar en cuotas</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td>a</td> <td>Saldo a pagar en cuotas</td> <td>001</td> <td>0,00</td> </tr> <tr> <td>b</td> <td>Cantidad de cuotas que solicita</td> <td>005</td> <td>0</td> </tr> <tr> <td>c</td> <td>Monto del pago a cuenta</td> <td>007</td> <td></td> </tr> </table>			a	Saldo a pagar en cuotas	001	0,00	b	Cantidad de cuotas que solicita	005	0	c	Monto del pago a cuenta	007																																																	
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<small>Declaro que los datos consignados en este formulario son correctos y completos y que se confeccionado la presente utilizando el programa aplicativo (software) entregado y aprobado por la AFIP, sin omitir ni falsear dato alguno que deba contener, siendo fiel expresión de la verdad.</small>																																																														

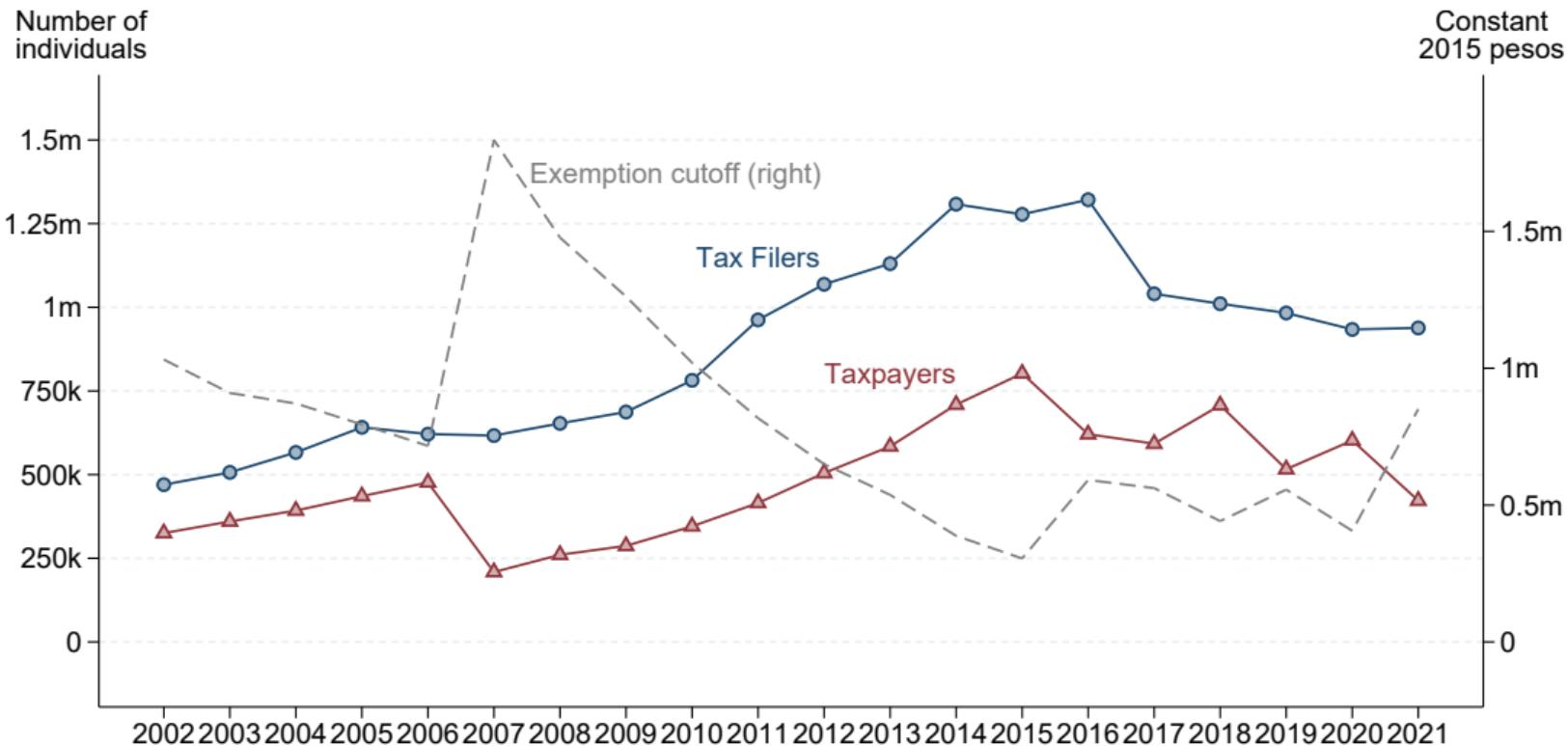
# Tax Rates and Wealth Tax Thresholds: 1991-2020

Fiscal Years	Exemption Threshold	Bracket 1	Bracket 2	Bracket 3	Bracket 4
<b>1991-1994</b>	100k/102.3k			1%	
<b>1995-1998</b>	102.3k			0.5%	
<b>1999-2006</b>	102.3k	0.5% 200k		0.75%	
<b>2007-2015 (notches)</b>	305k	0.5% 750k	0.75% 2m	1% 5m	1.25%
<b>2016</b>	800k			0.75%	
<b>2017</b>	950k			0.50%	
<b>2018</b>	1.05m			0.25%	
<b>2019-2020 domestic assets</b>	2m	0.5% 3m	0.75% 6.5m	1% 18m	1.25%
<b>2019-2020 foreign assets</b>	2m	0.7% 1.20%	1.80%		2.25%

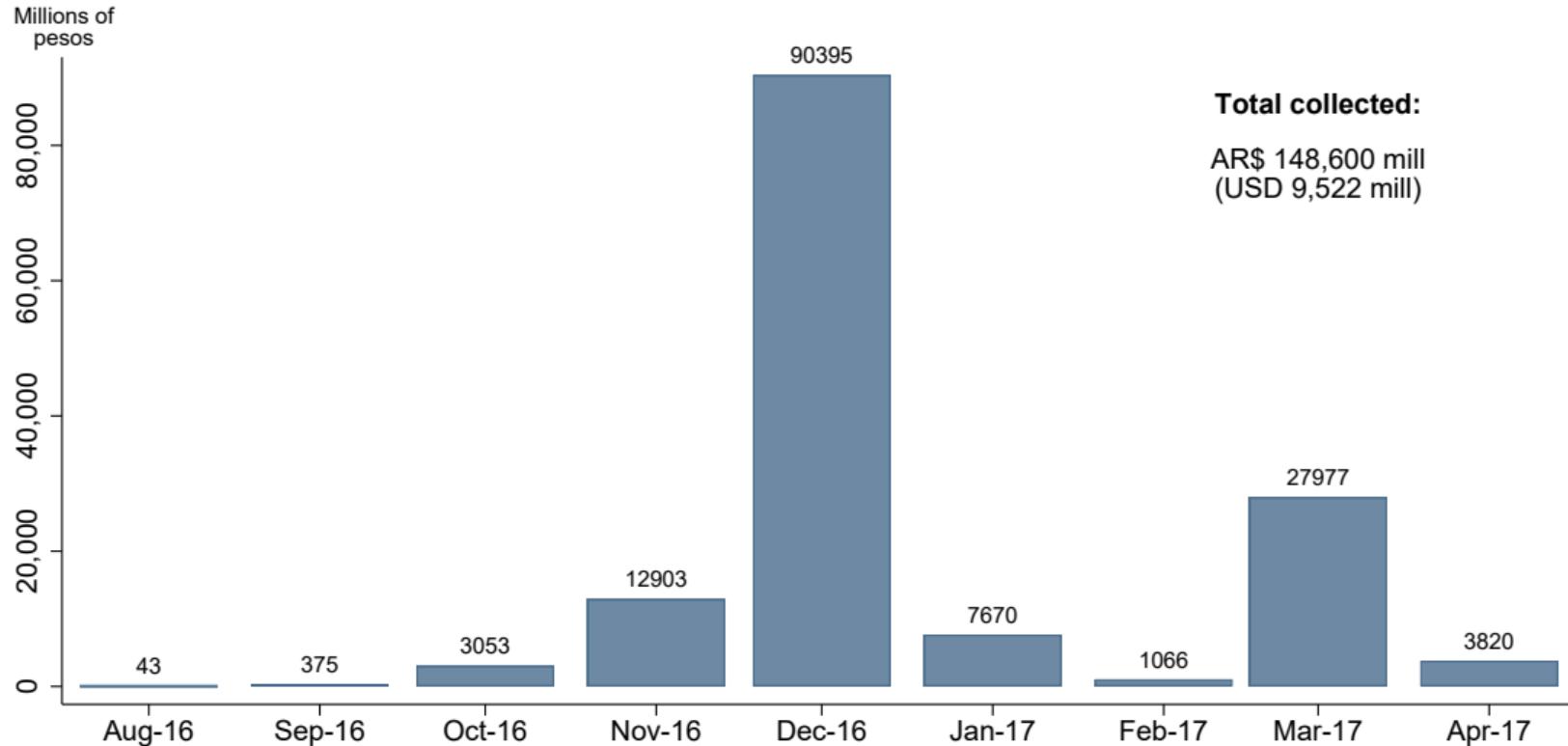
Notes: Thresholds (in current pesos) are reported in blue. For 2007-2015 the thresholds operated as notches. ▶ Back  
Filing thresholds (earnings): 2007-2014: \$96k; 2015: \$200k; 2016: \$500k; 2017: \$1m; 2018: \$1.5m; 2019: \$2m; 2020: \$2.5m.

# Wealth Tax Filers and Wealth Tax Payers

Back

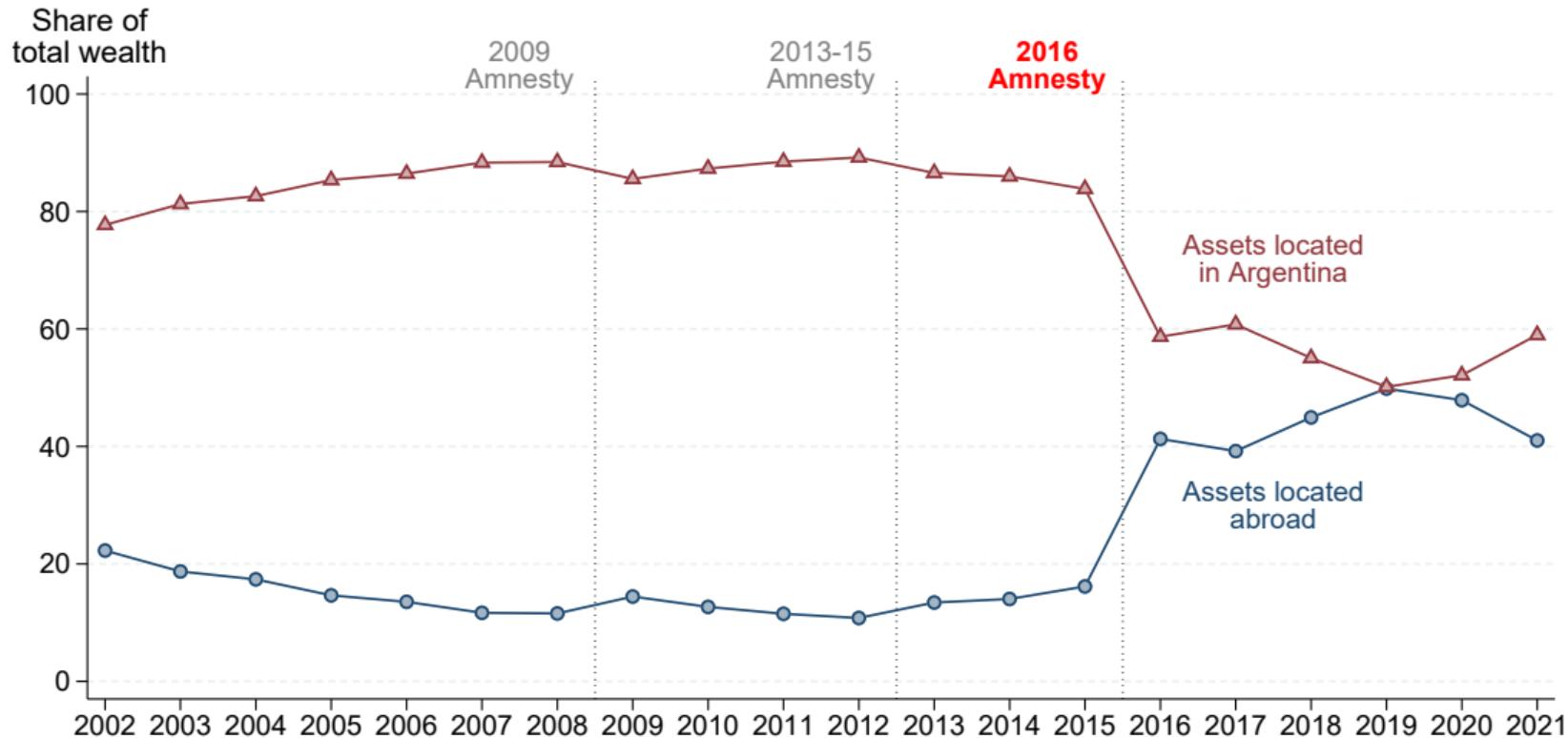


# Revenue from the 2016 Amnesty's Special Tax

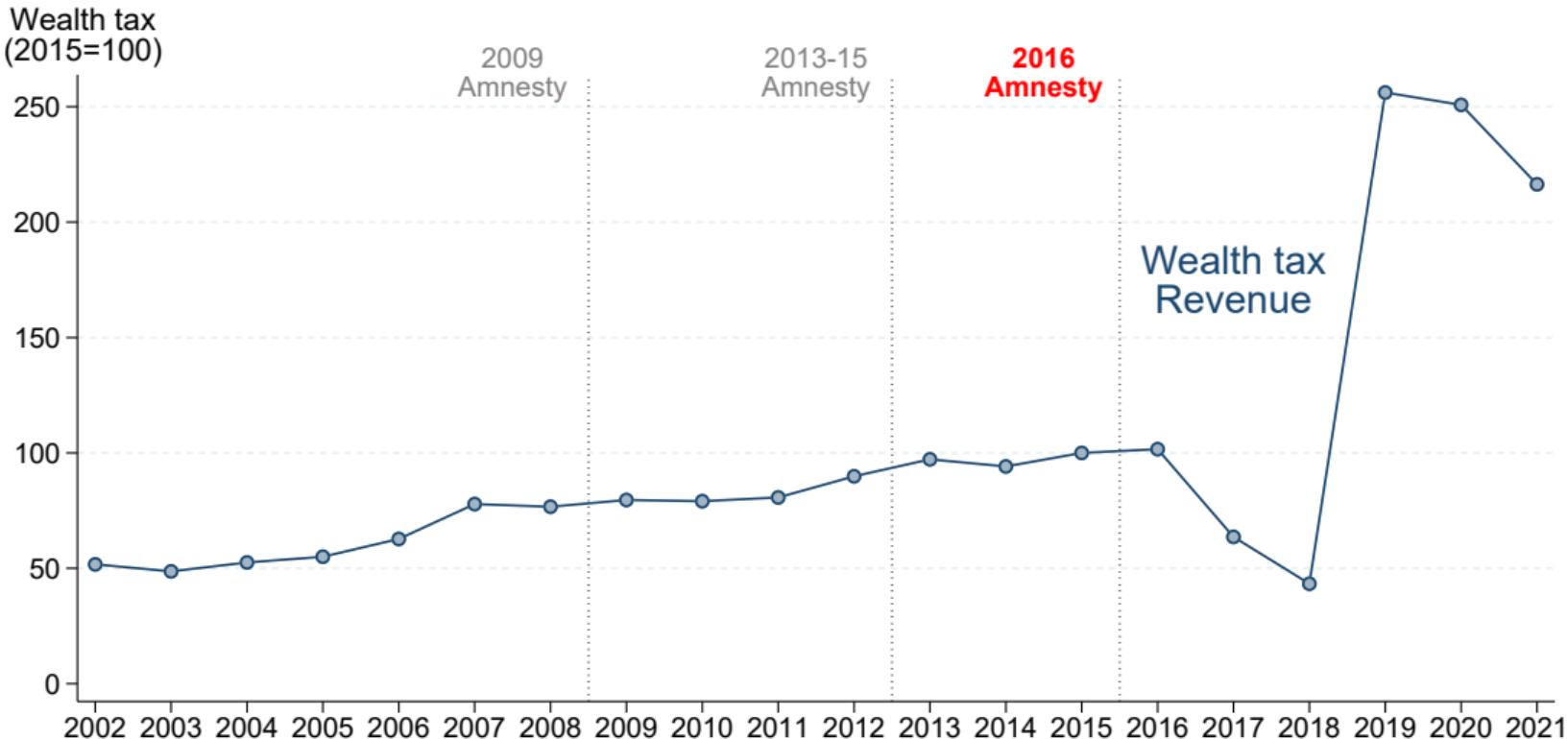
[Back](#)[Disclosures](#)

# Foreign vs Domestic Assets

Share of total wealth [Back](#)

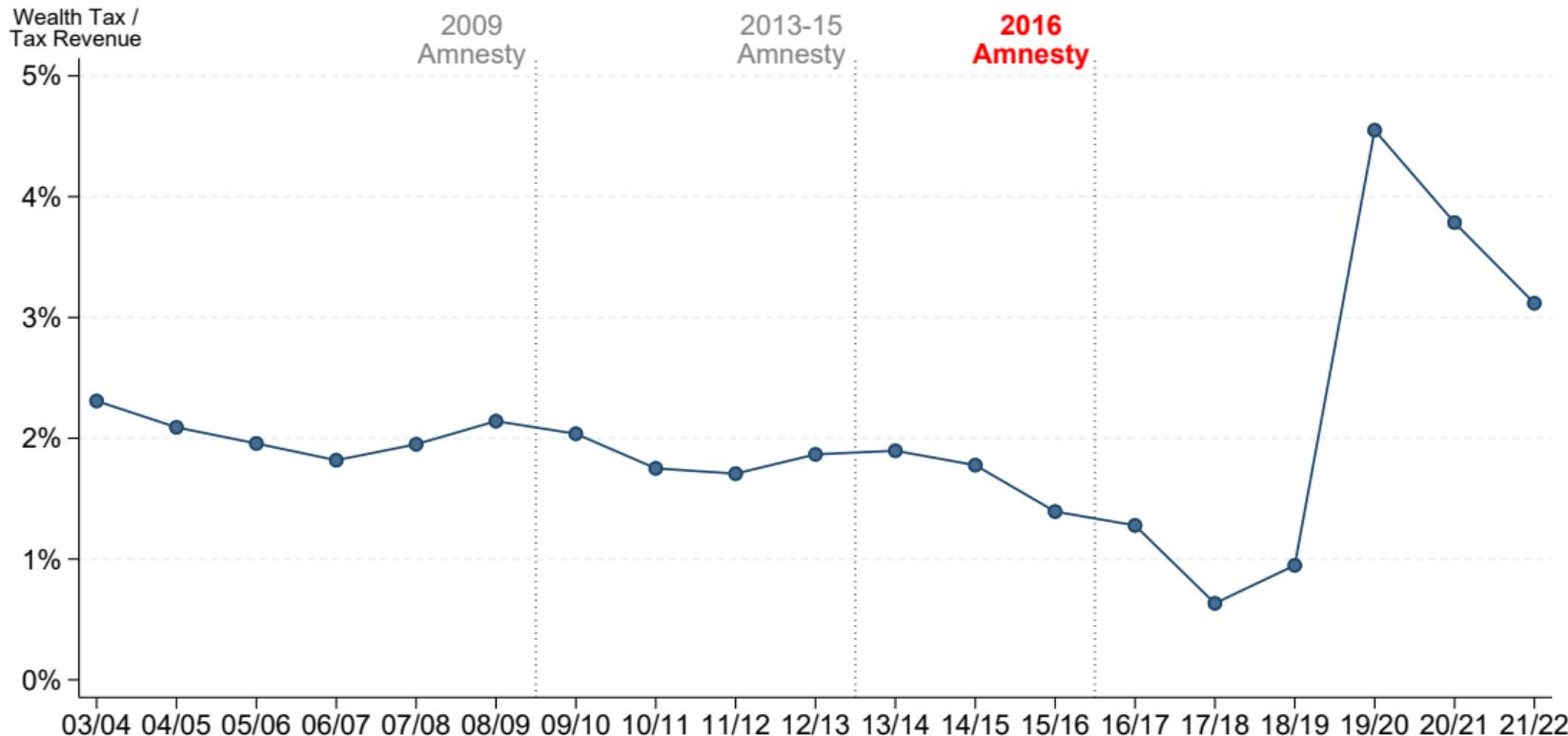


# Wealth Tax Revenue



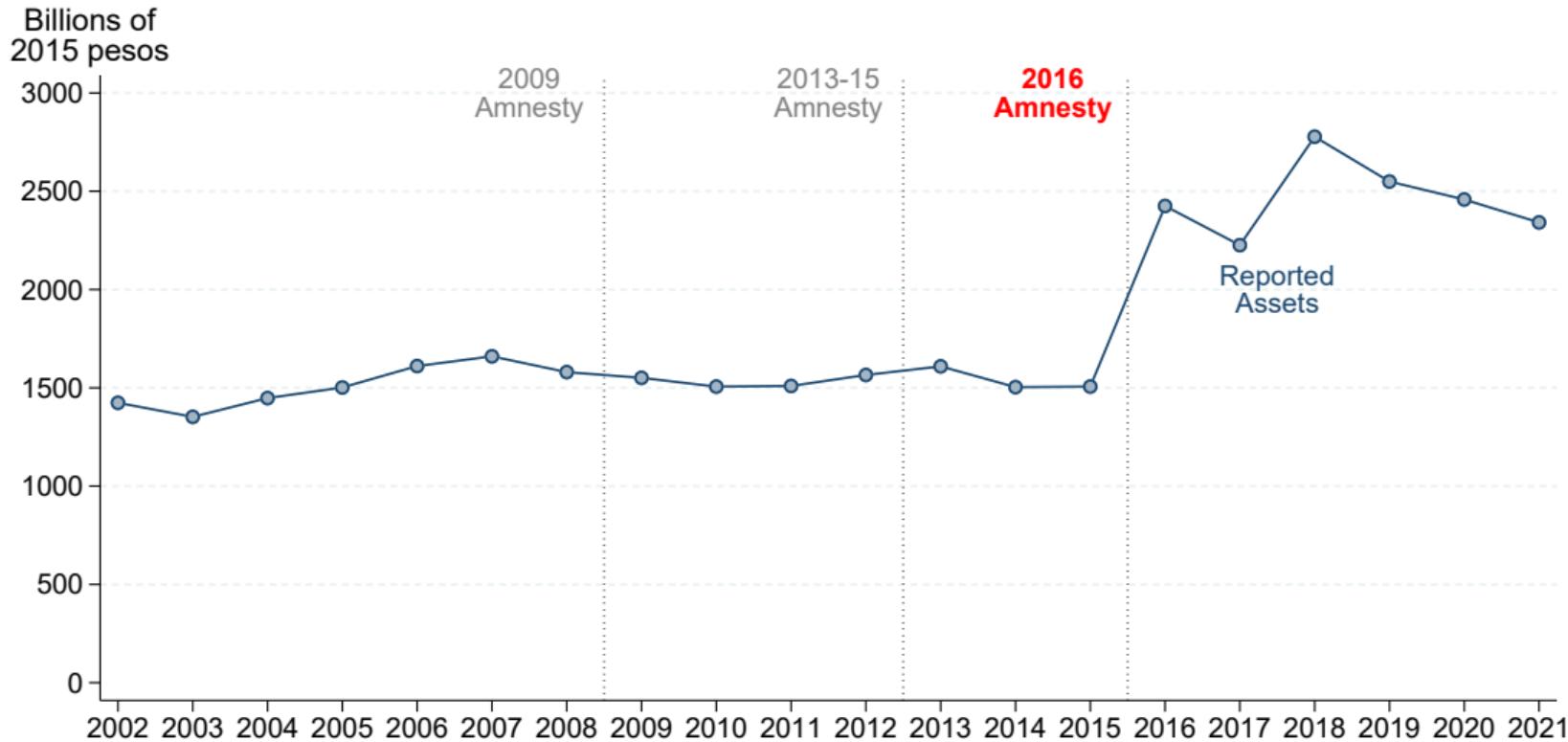
A 256% increase in wealth tax revenue!

# Wealth Tax / Tax Revenue (%)



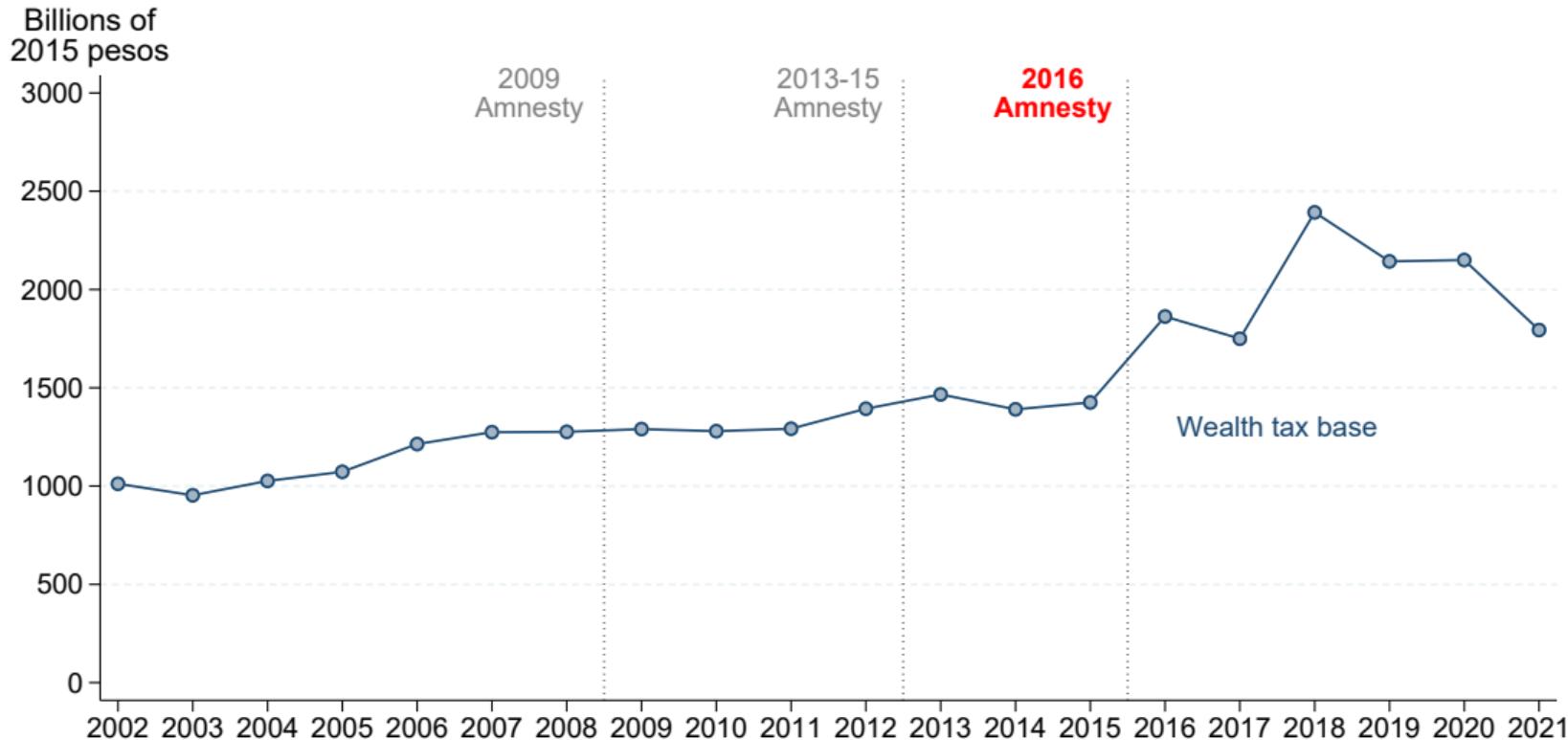
# Reported Wealth (levels)

► Back



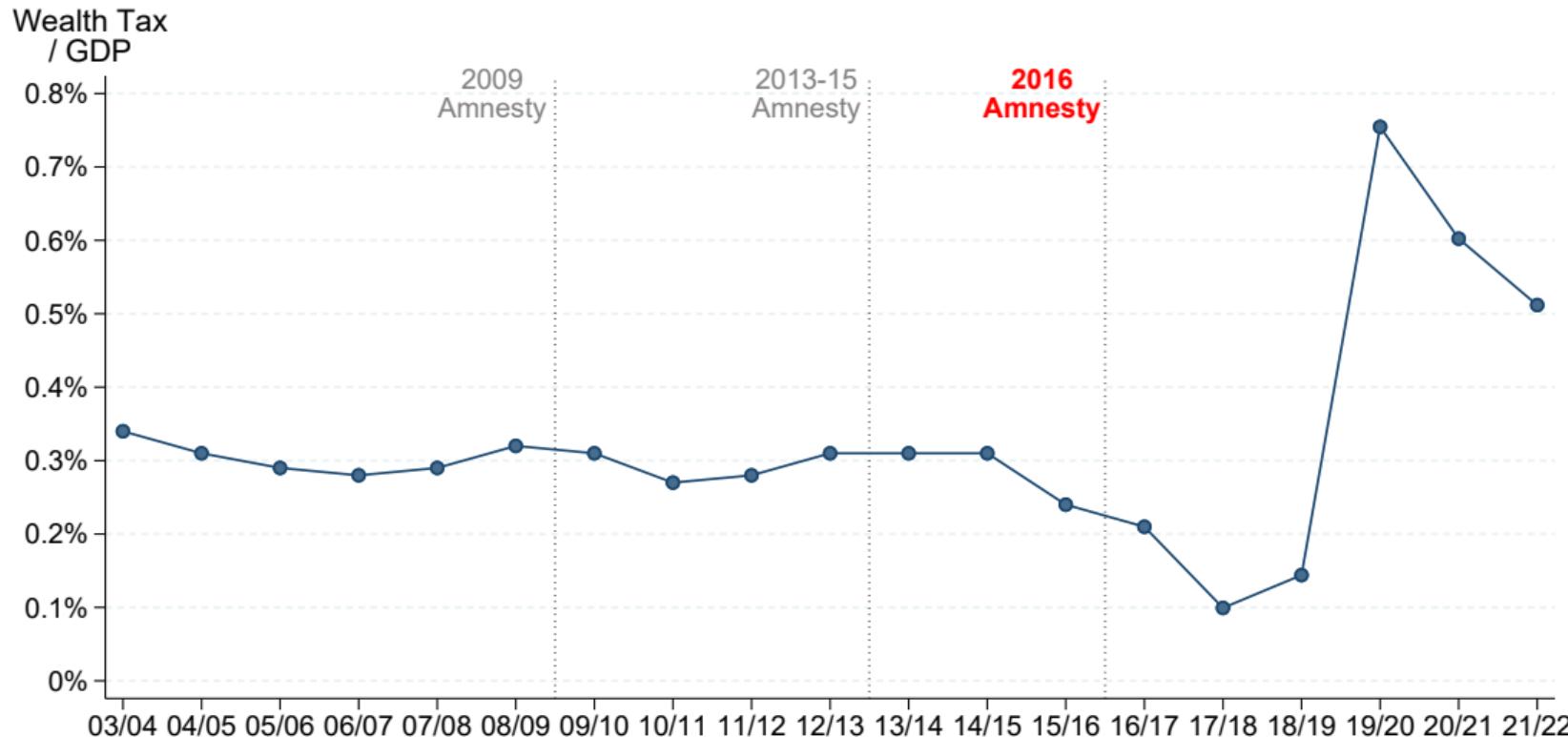
# Wealth Tax Base

Back



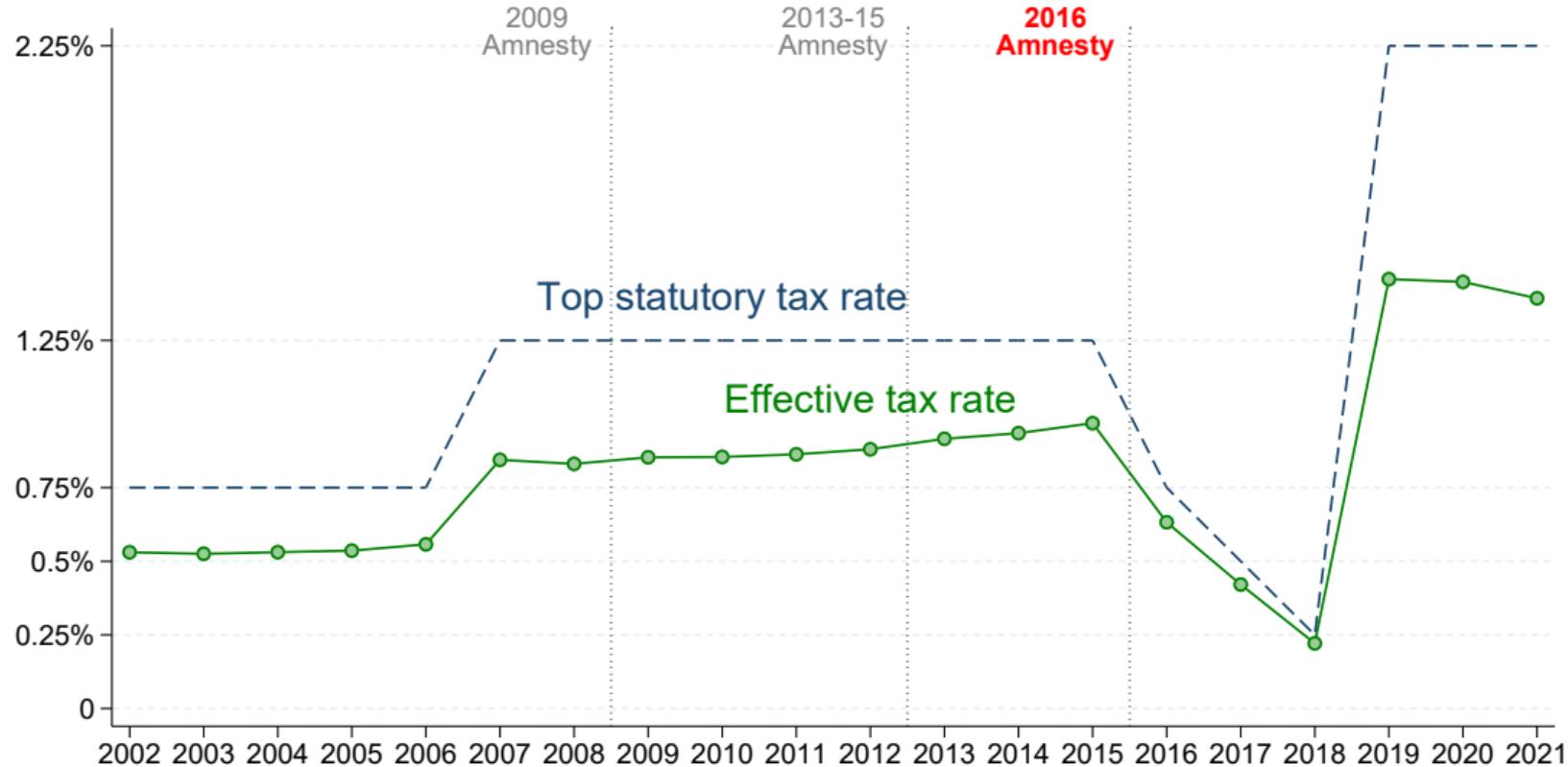
# Wealth Tax Revenue / GDP (%)

Back



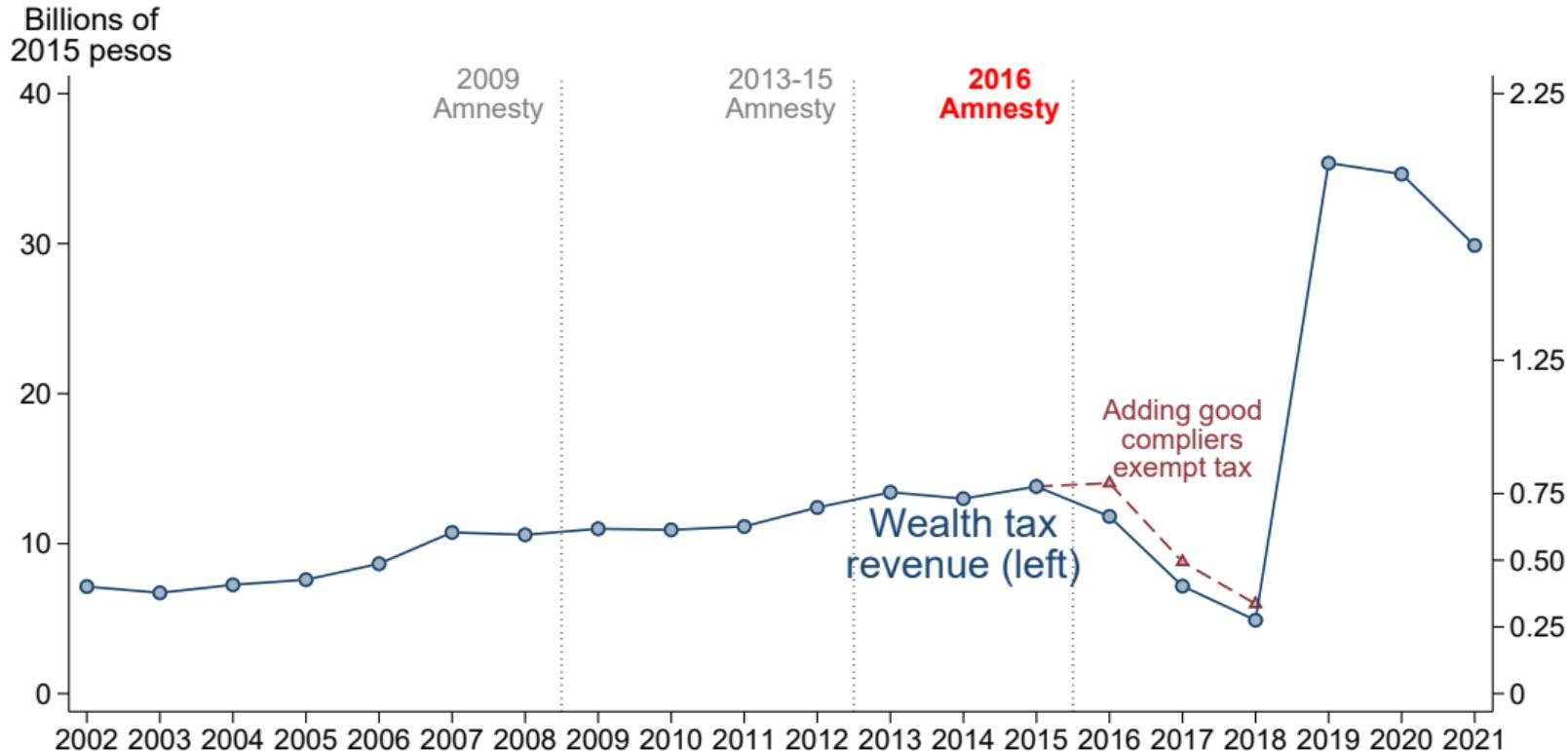
# Effective Tax Rate

▶ Back

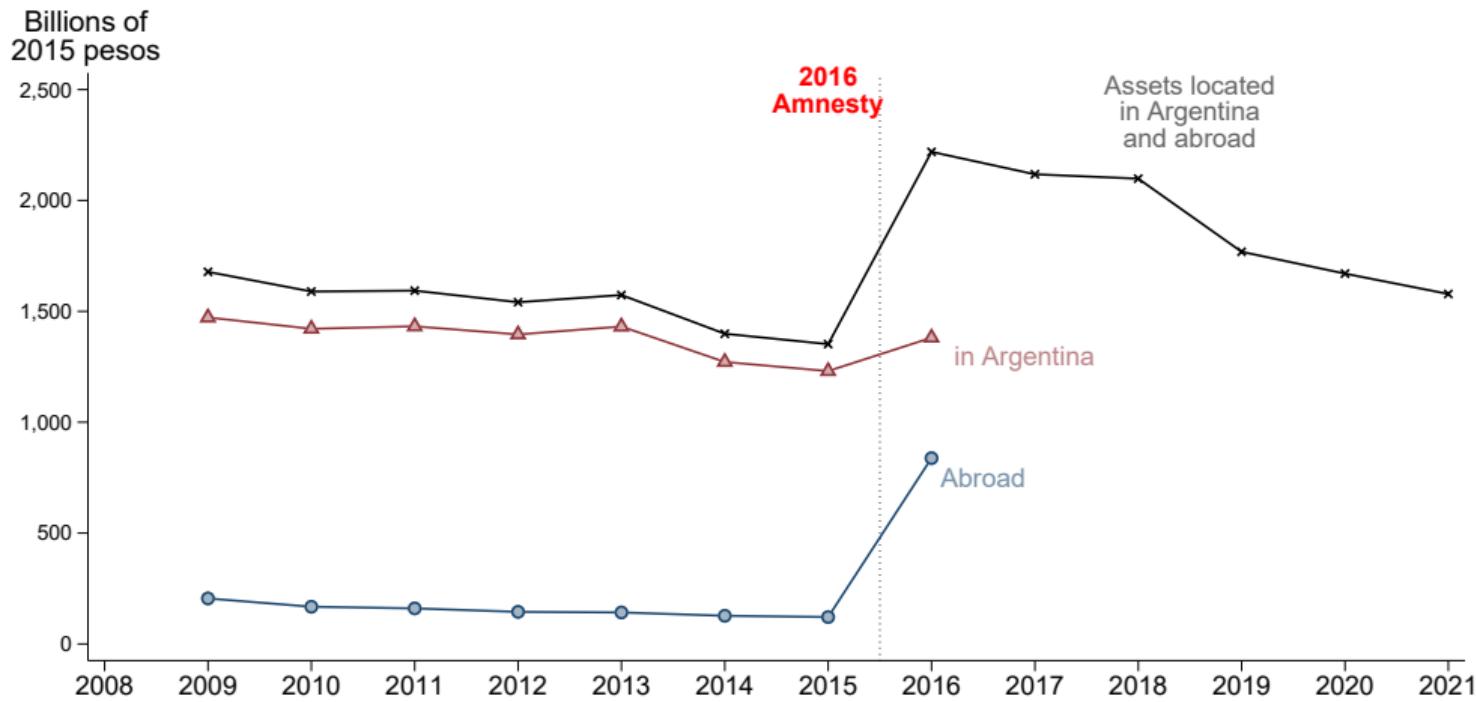


# Revenue with and without “Good Compliers”

▶ Back



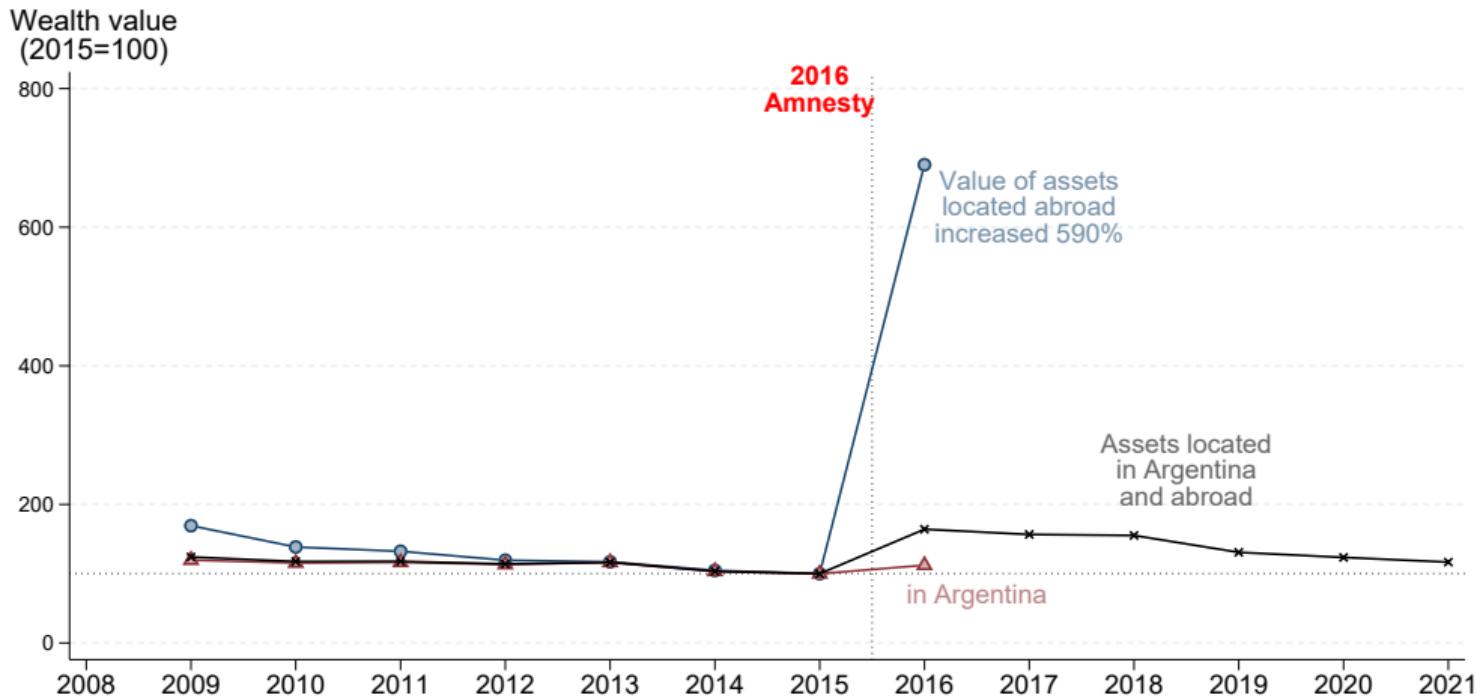
# Wealth reported in income tax returns



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

# Wealth reported in income tax returns

▶ Zoom in



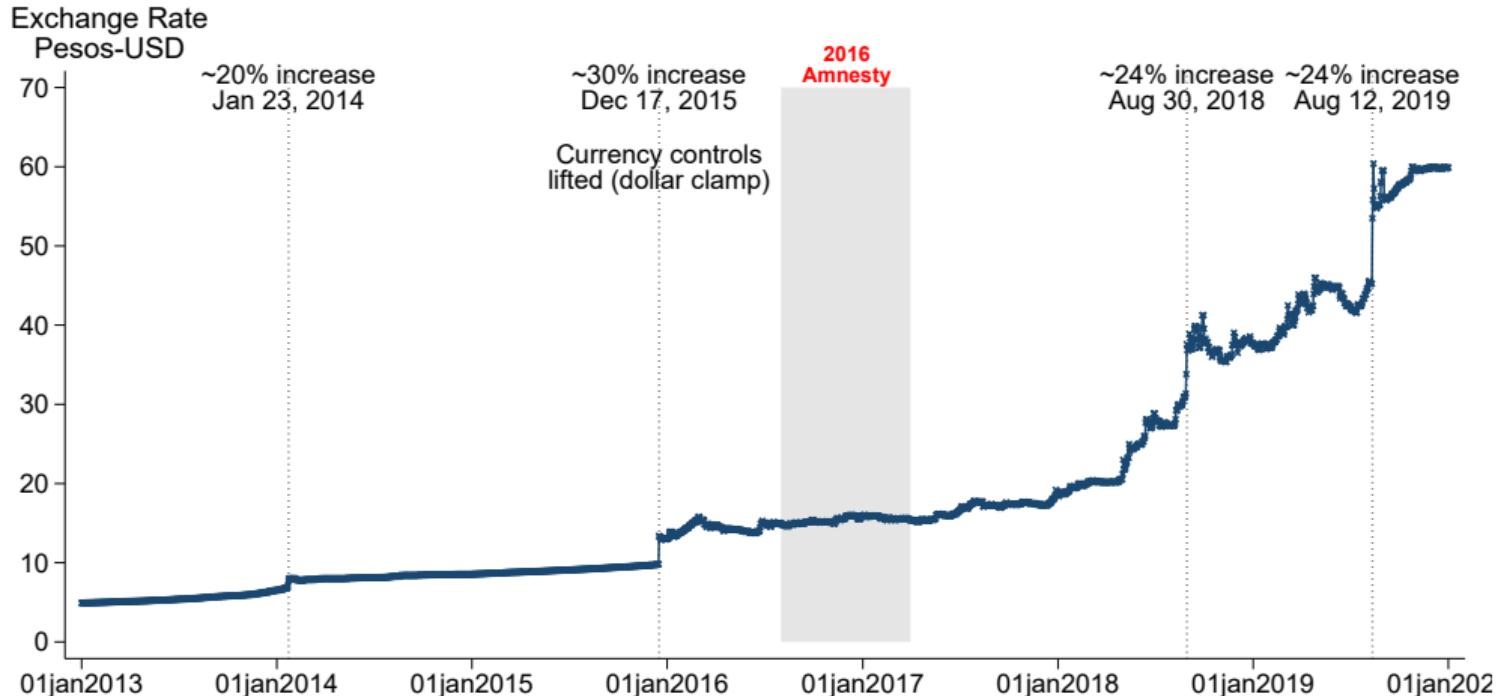
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## Annual inflation [2000-2017]

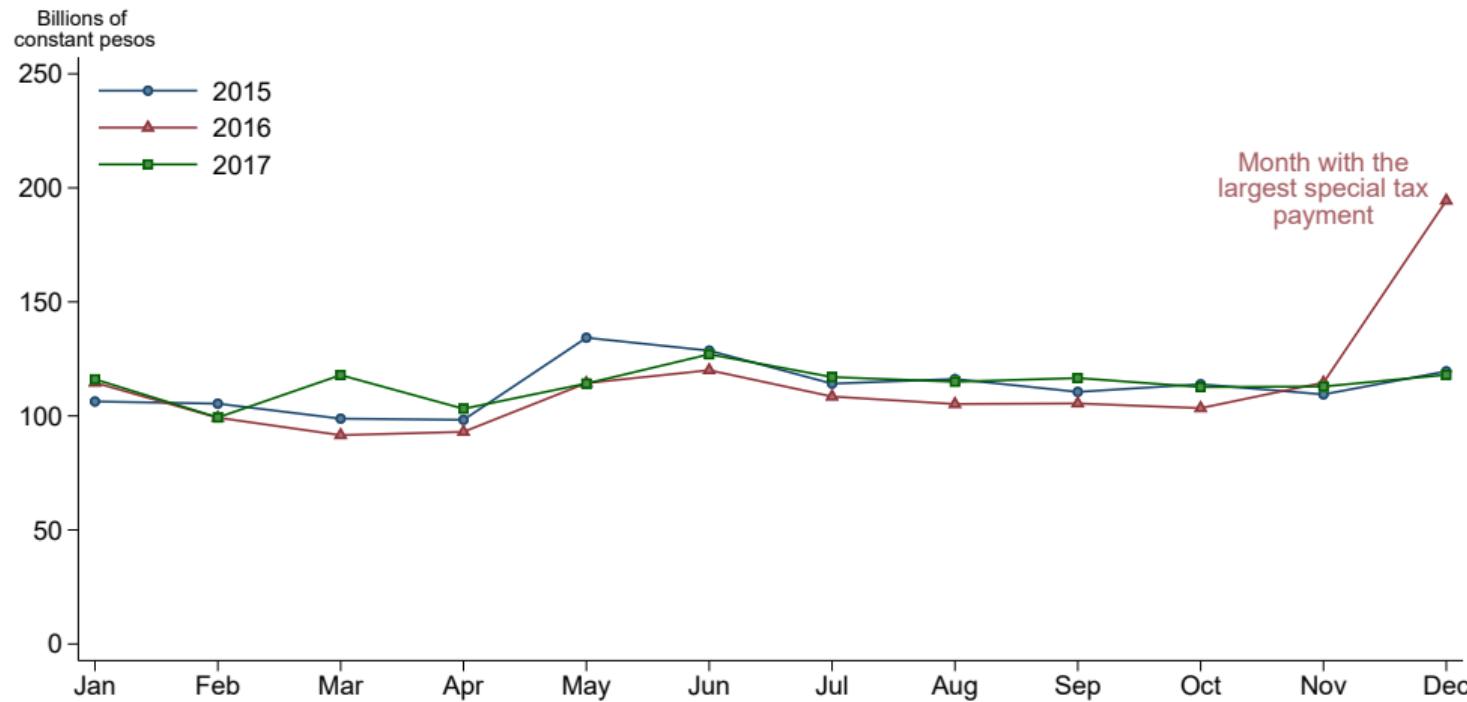


# Exchange Rate Pesos-US Dollar

Back



# Total Tax Revenue



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

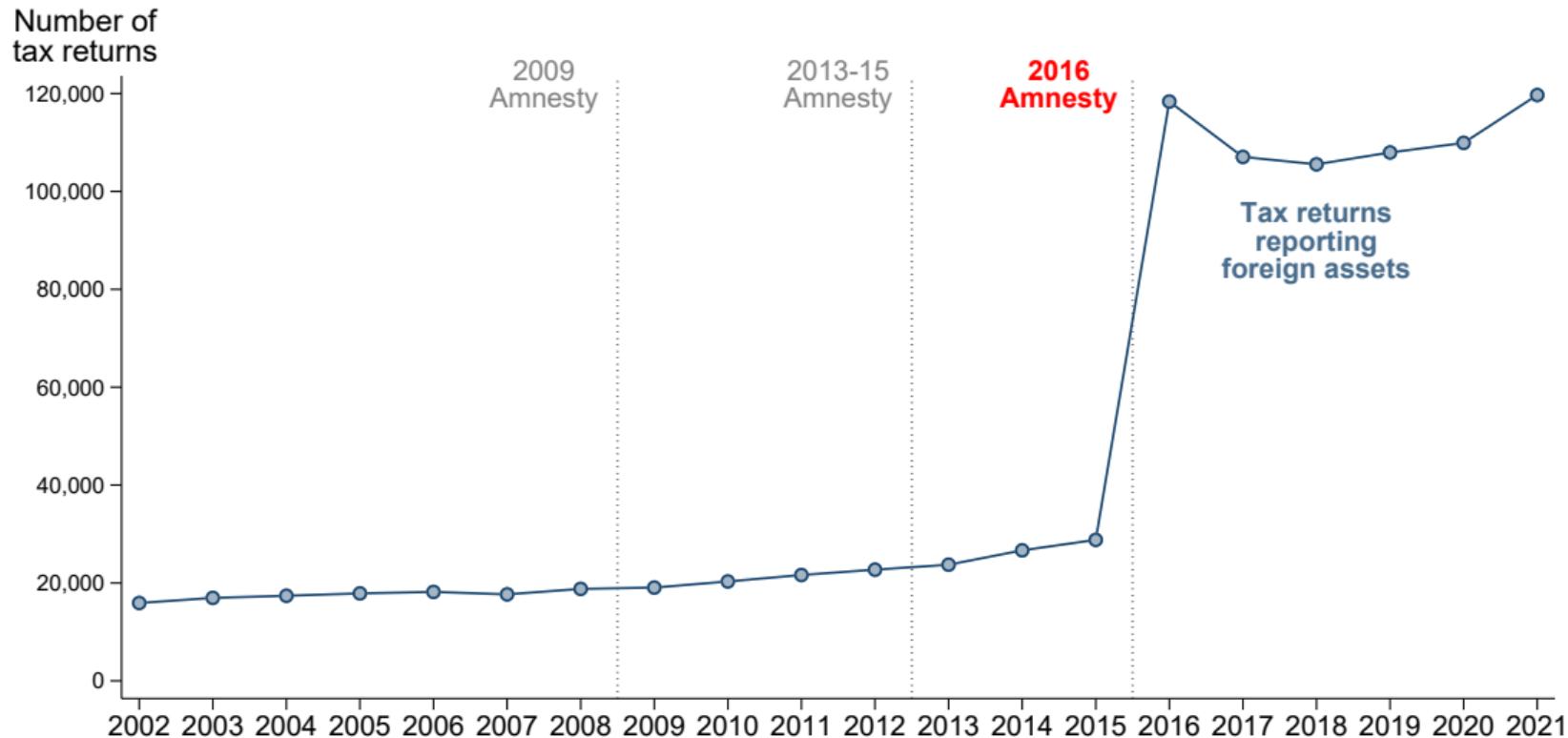
## Details of disclosed assets

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
<b>Total</b>	<b>116,775</b>	100
<b>% of GDP</b>		<b>21%</b>

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

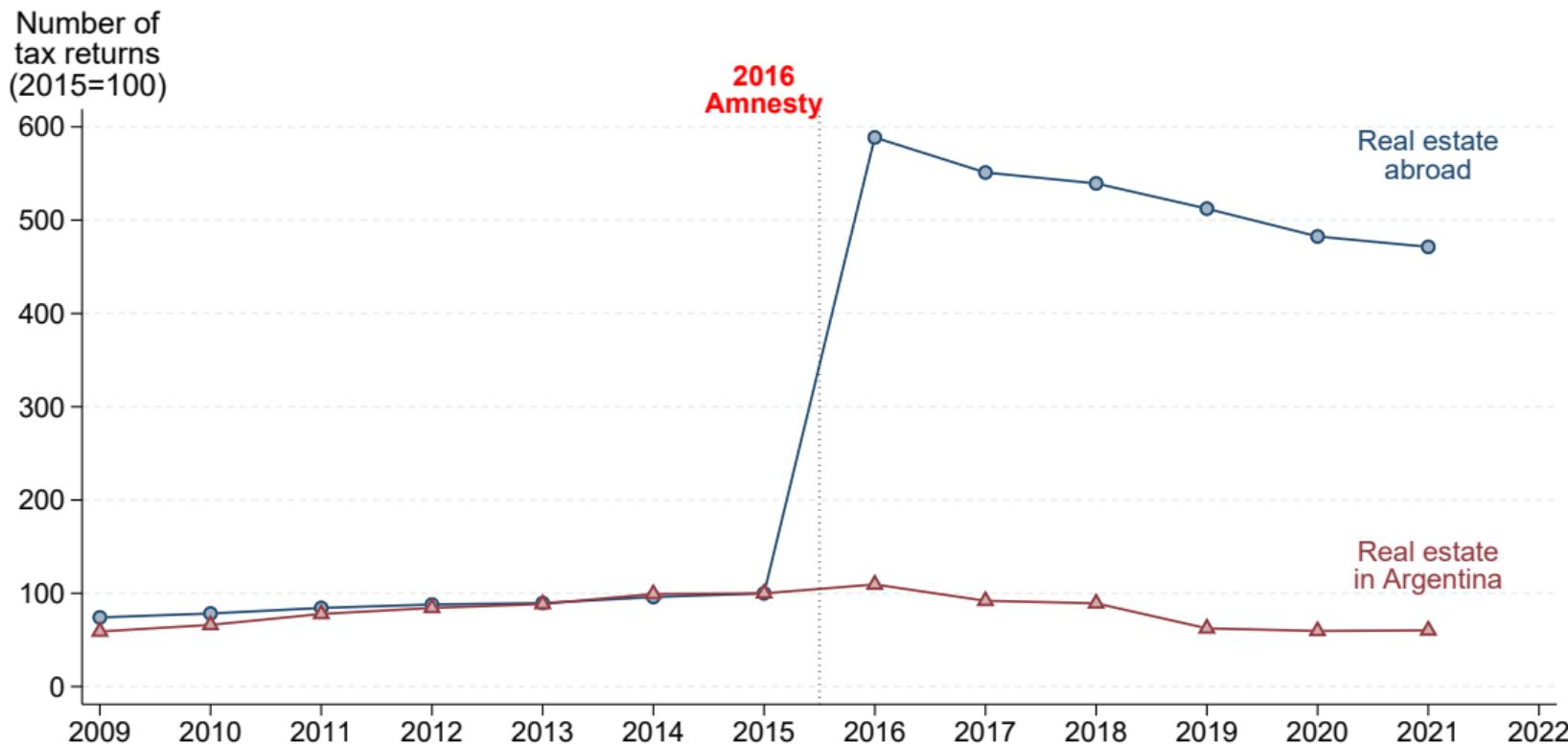
▶ Back



# Real Estate

▶ Back

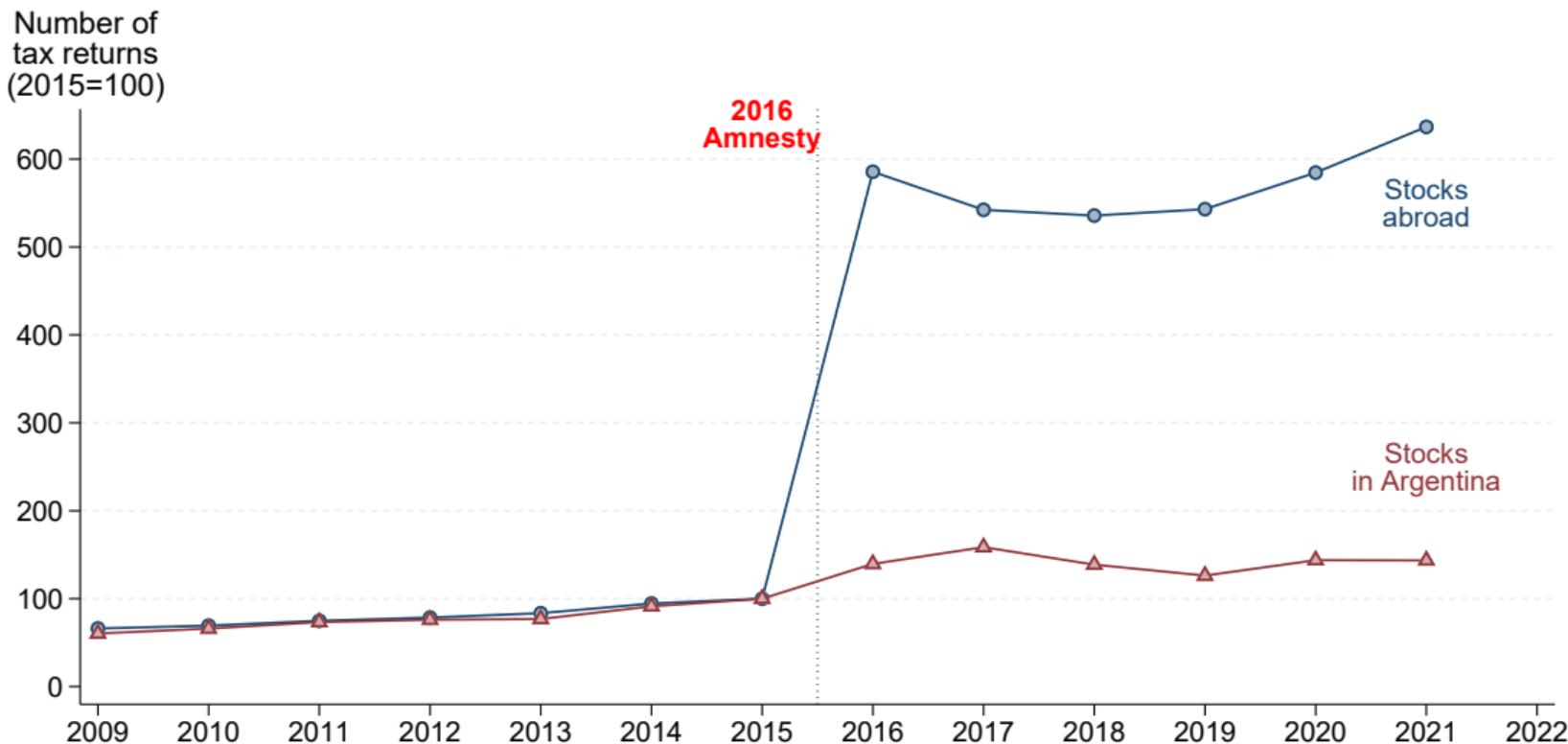
## Abroad vs in Argentina



# Stocks

▶ Back

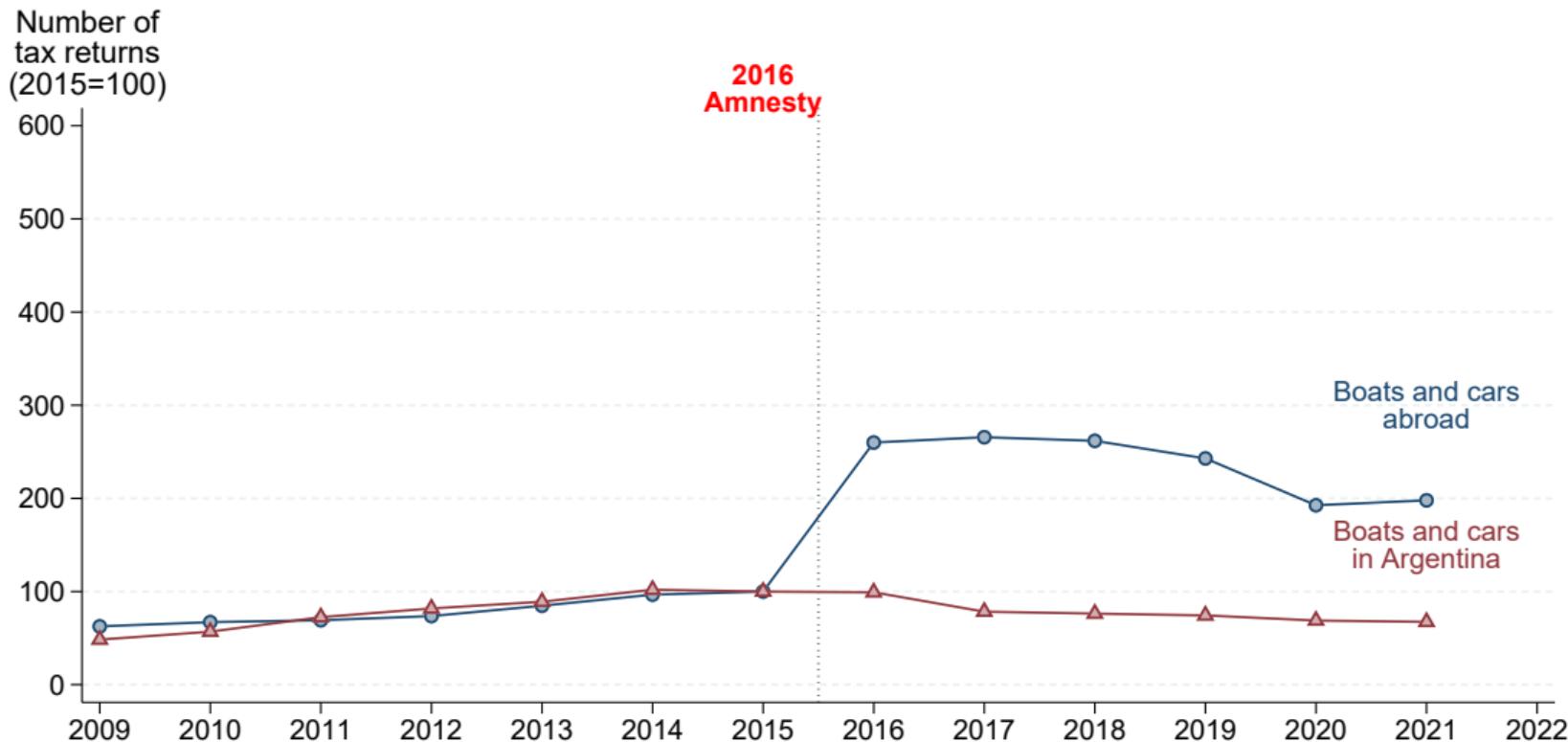
## Abroad vs in Argentina



# Vehicles

Back

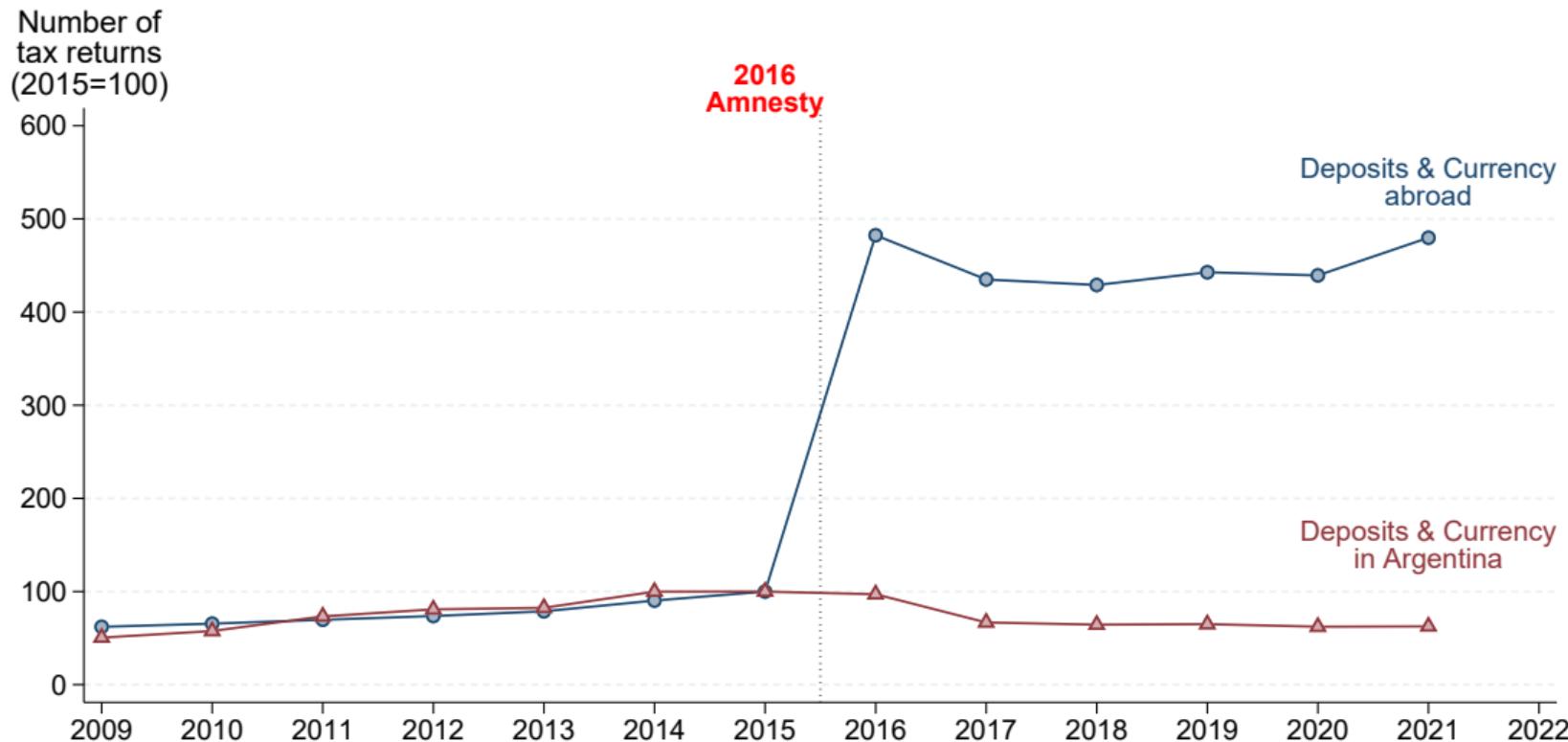
## Abroad vs in Argentina



# Bank deposits and currency

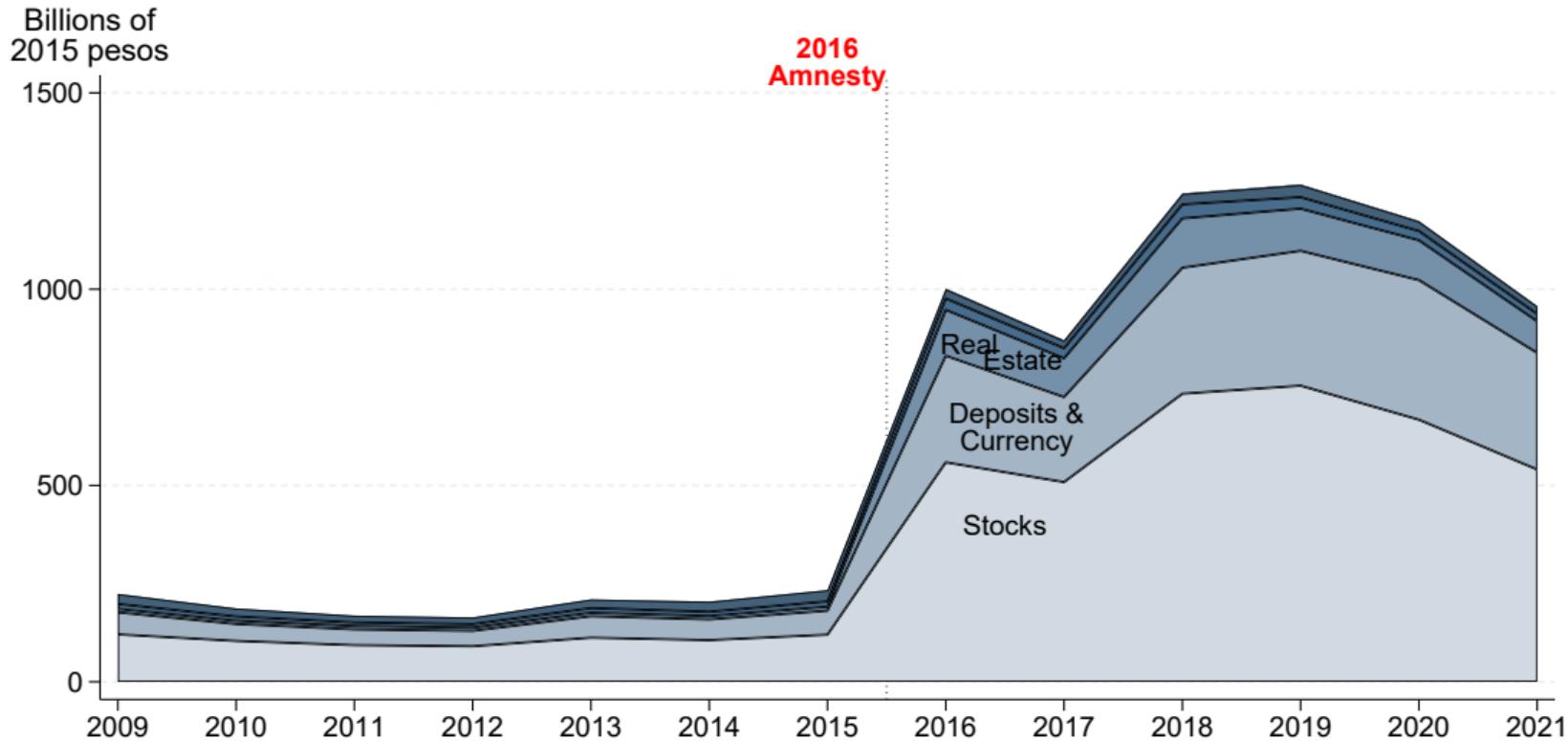
▶ Back

Abroad vs in Argentina



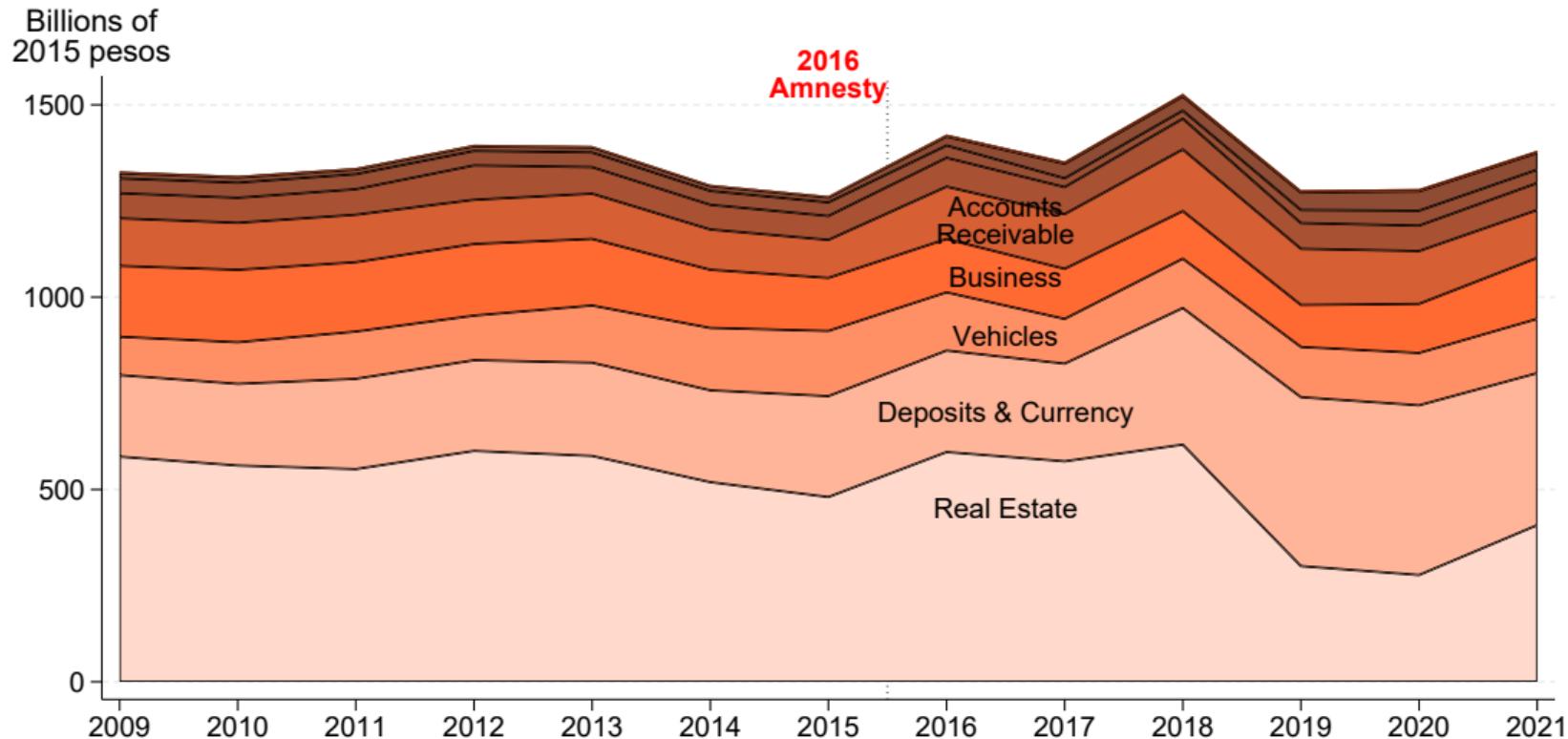
# Massive disclosures of foreign stocks, cash, and real estate

▶ Back

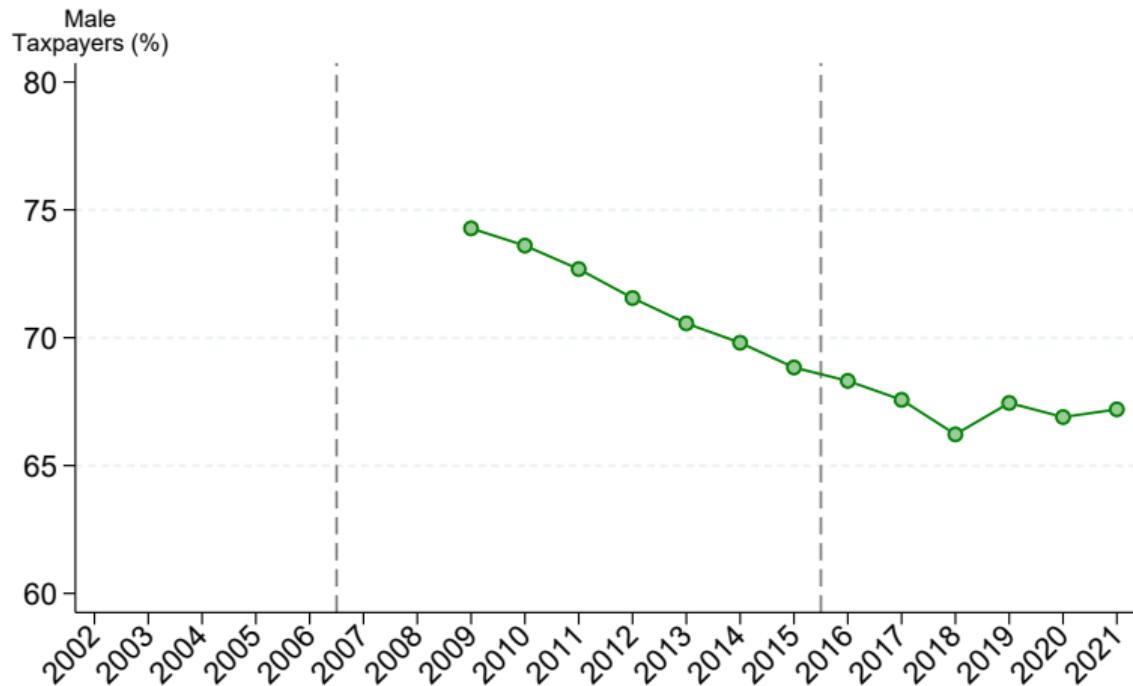


# Domestic real estate and cash also increase (but smaller in %)

▶ Back

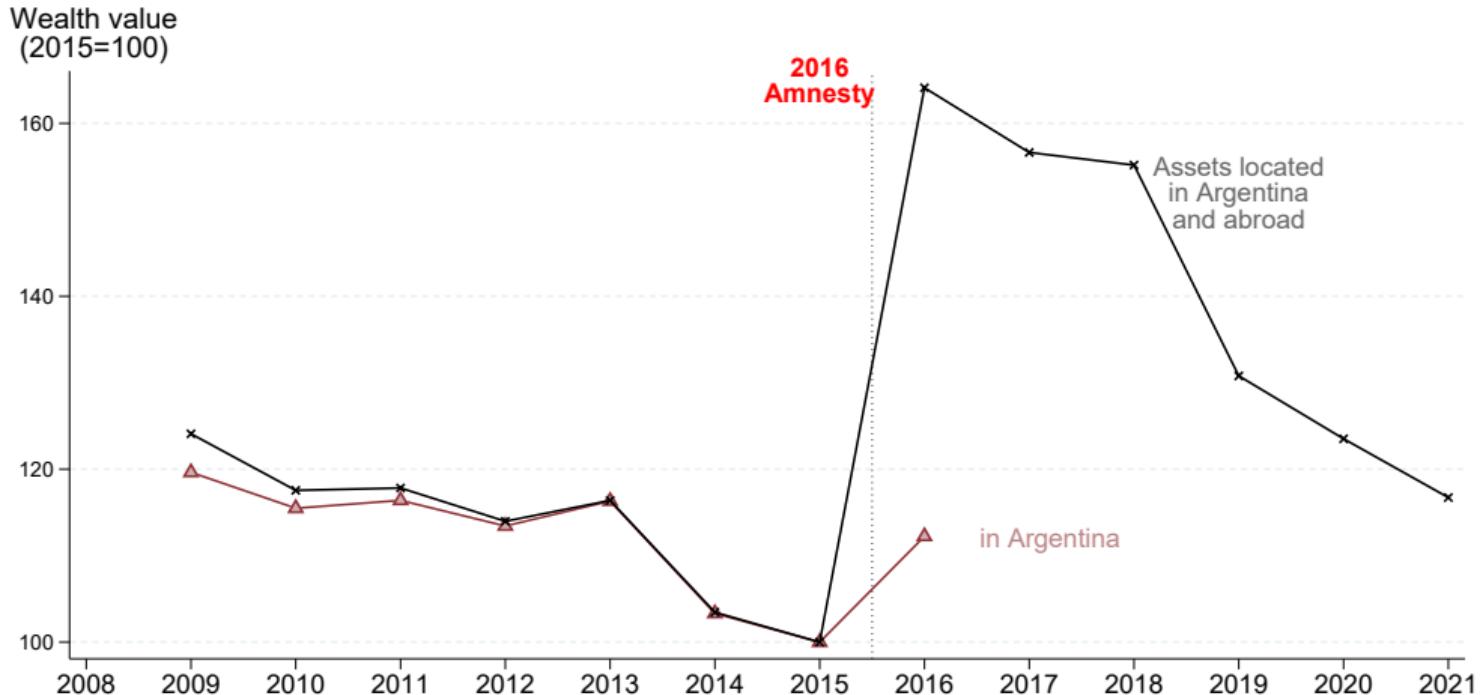


# Share of Male Wealth Tax Payers



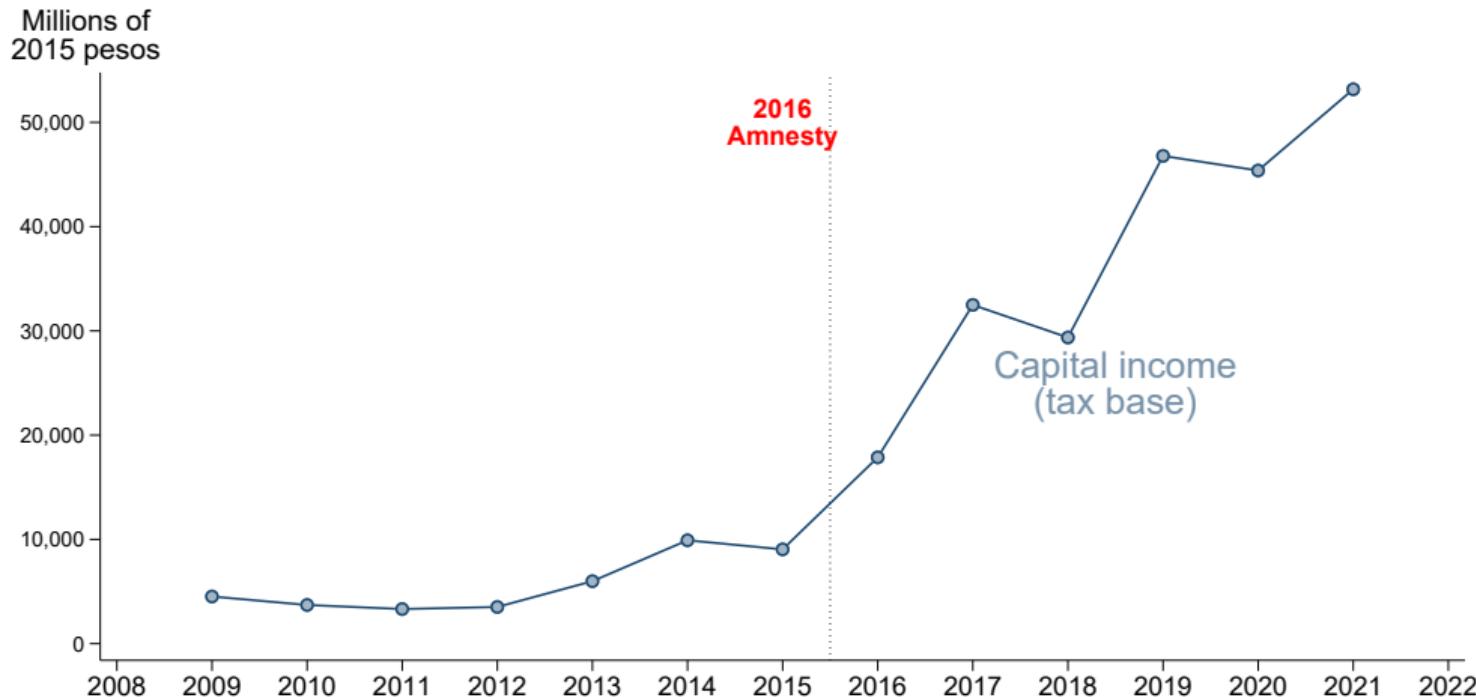
# Wealth reported in income tax returns

▶ Back



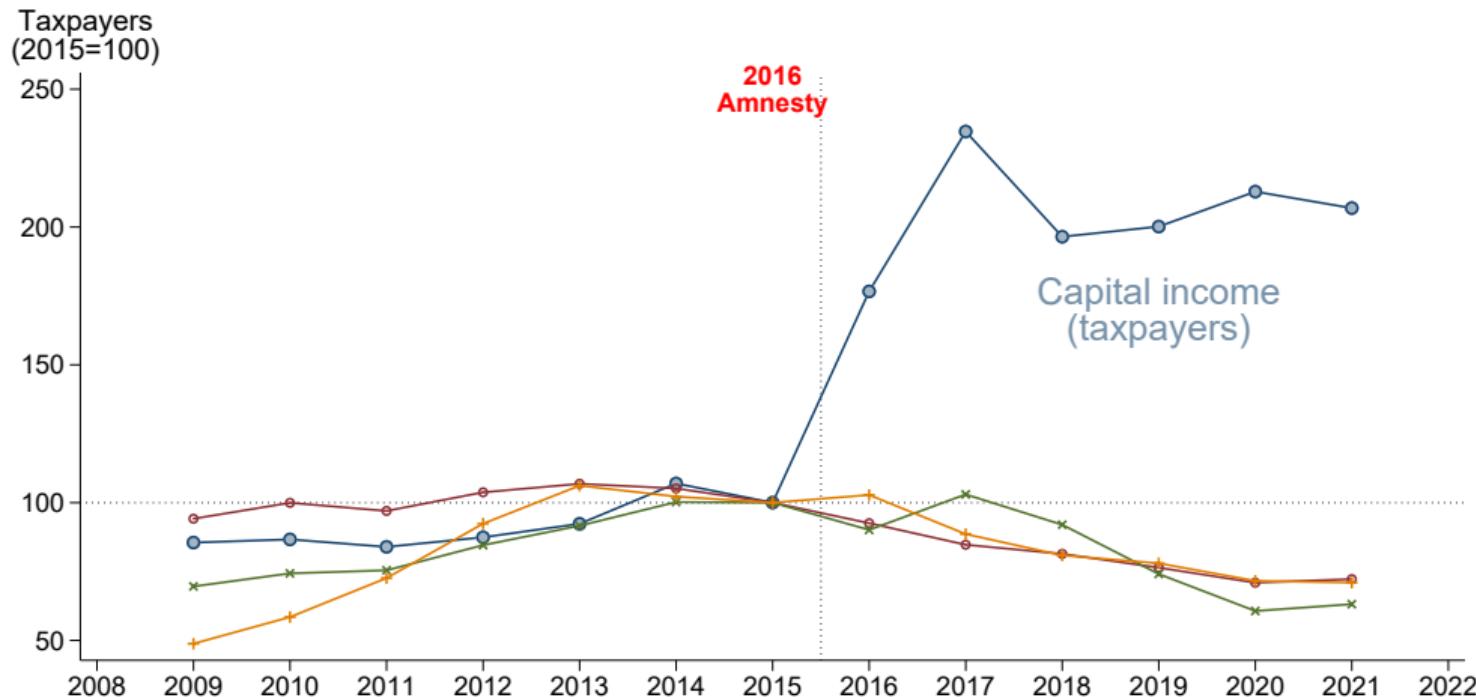
# Fiscal Externalities into the Income Tax

Capital Income: Tax base [Back](#)



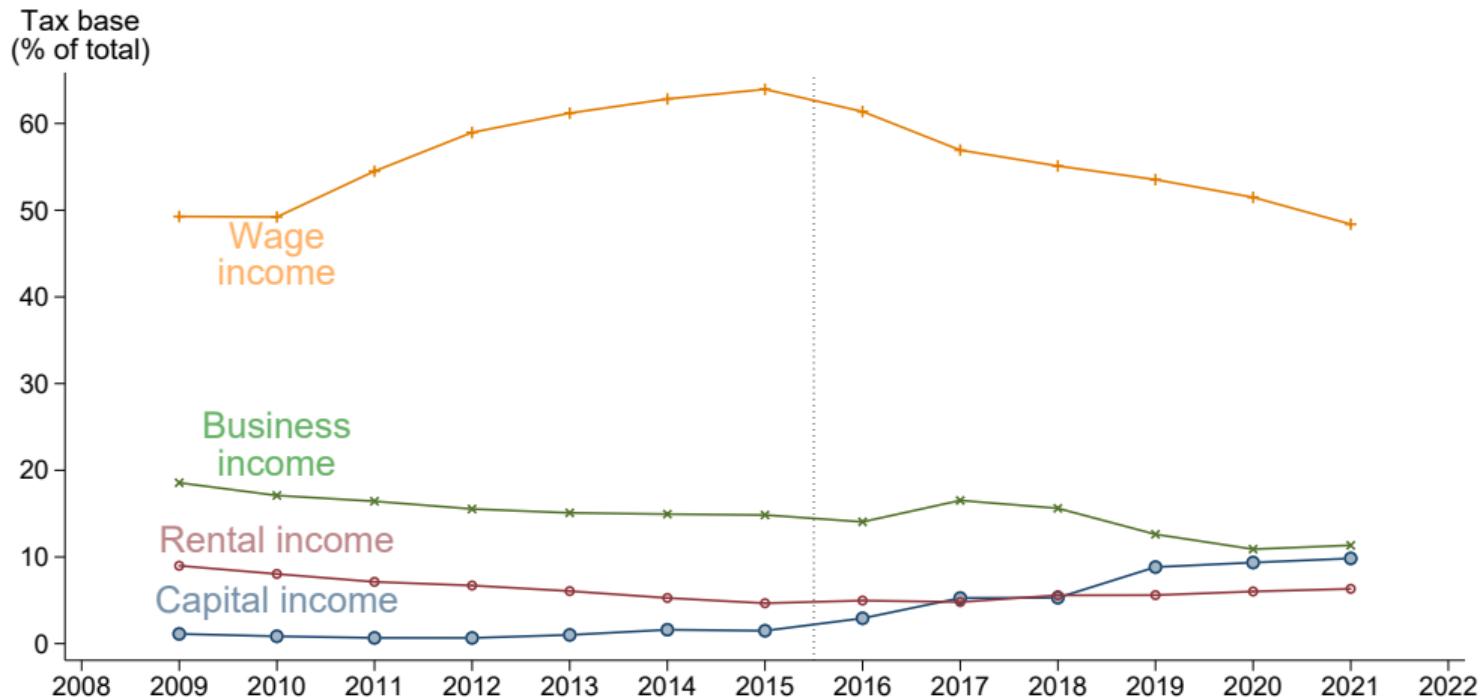
# Fiscal Externalities into the Income Tax

Capital Income: Taxpayers [▶ Back](#)



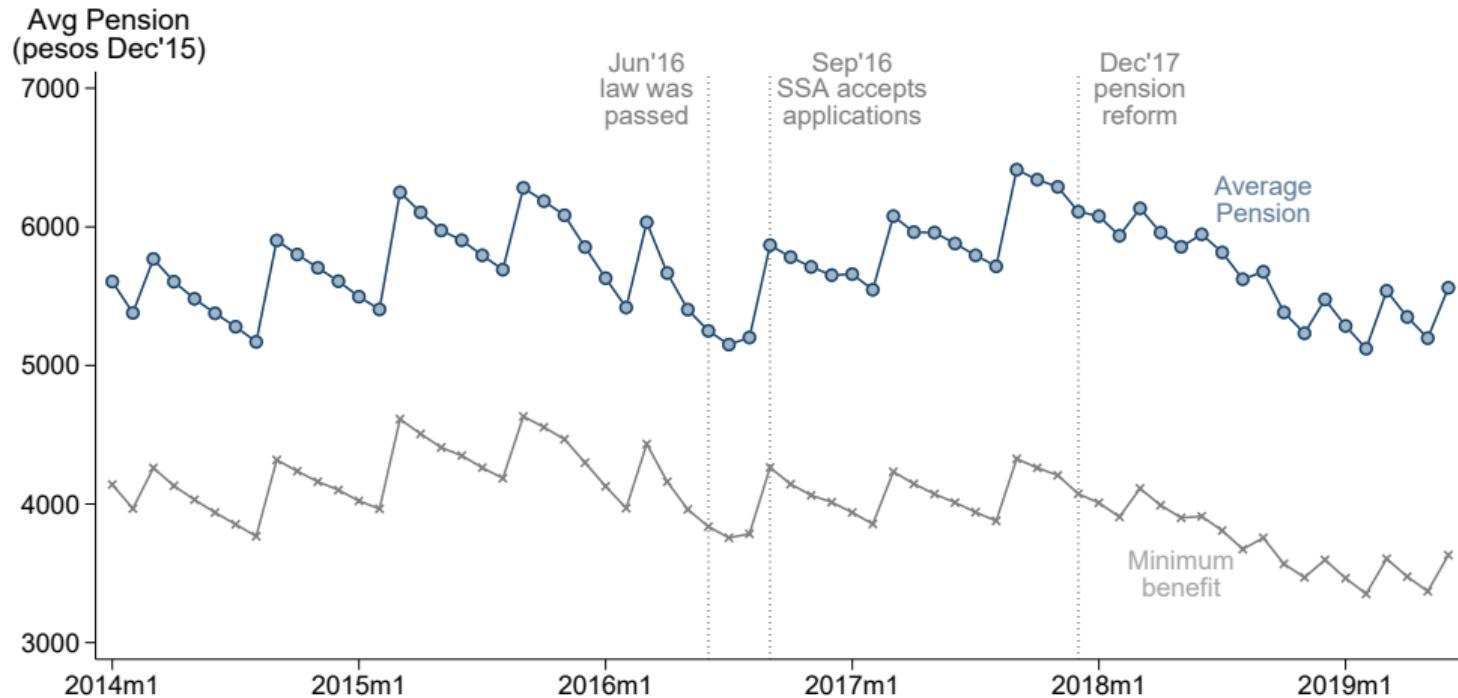
# Fiscal Externalities into the Income Tax

Capital Income: Share of total tax base [Back](#)



# Fiscal Externalities into Pensions

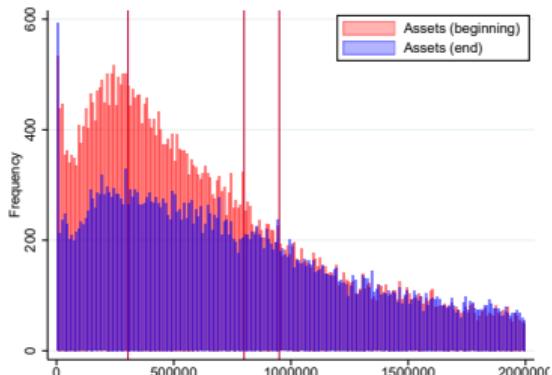
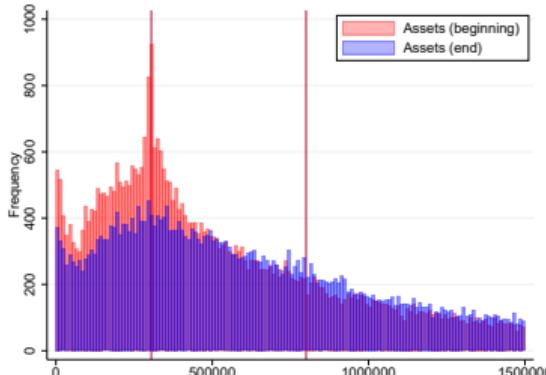
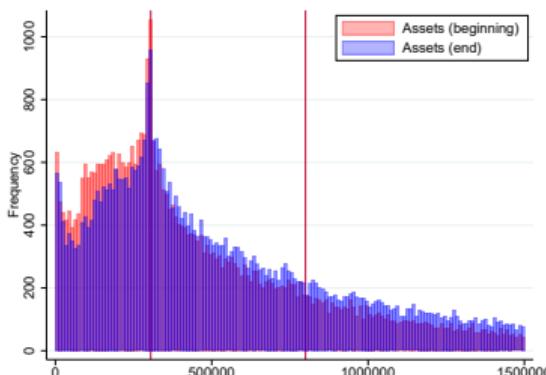
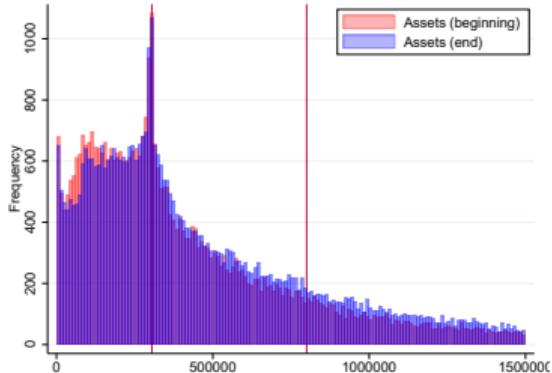
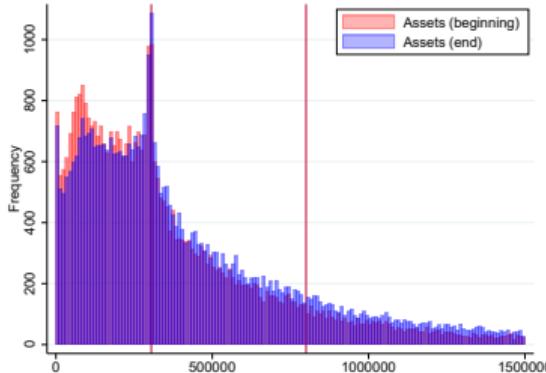
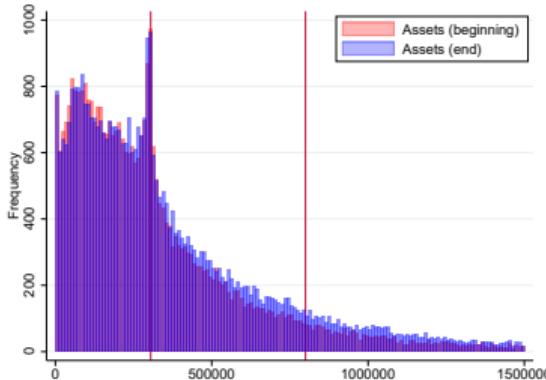
Average pensions [Back](#)



# Distribution of wealth (assets)

Bunching at the exemption cutoff

► Back





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?

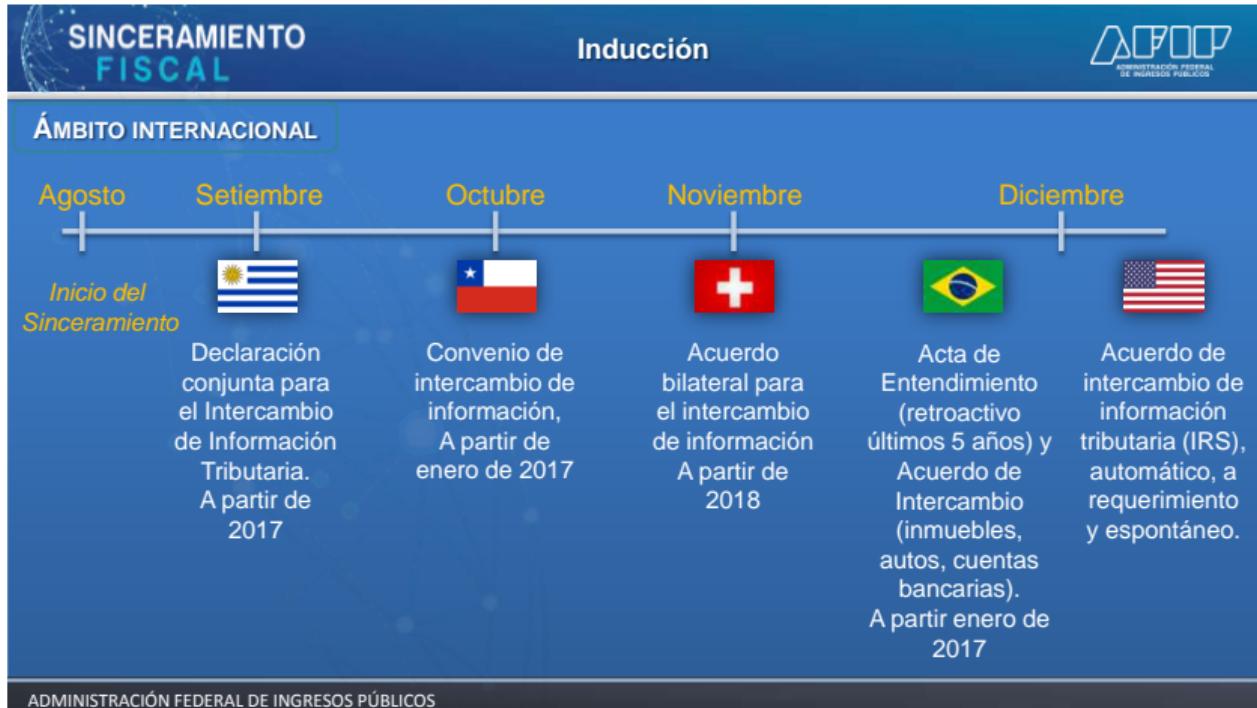
	2009	2013-2015	2016
President	Fernandez	Fernandez	Macri
Political inclination	Left	Left	Right
Can you disclose foreign currencies?	✓	✓	✓
Can you disclose assets?	✓		✓
Is there a penalty for disclosing?	✓		✓
Is there a reduced penalty for repatriation?	✓		✓
Is repatriation required?		✓	
Is there a credible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

## A credible threat of detection? Yes

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- ▶ 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

## Timeline of agreements signed during the 2016 amnesty

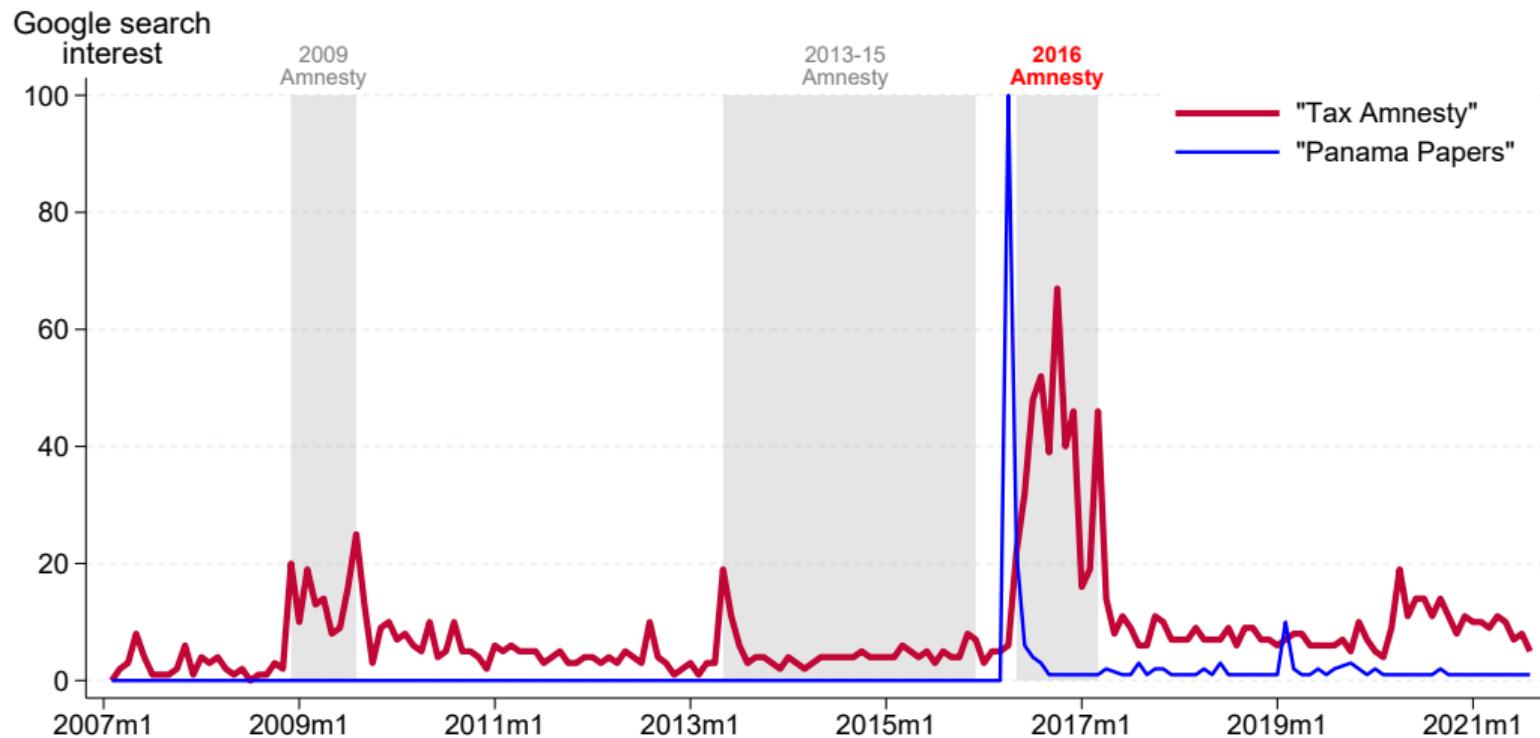


Source: Slide taken from AFIP's communication campaign.

# 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 ⇒ 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 ⇒ discourages participation of evaders but retains support and compliance of honest taxpayers

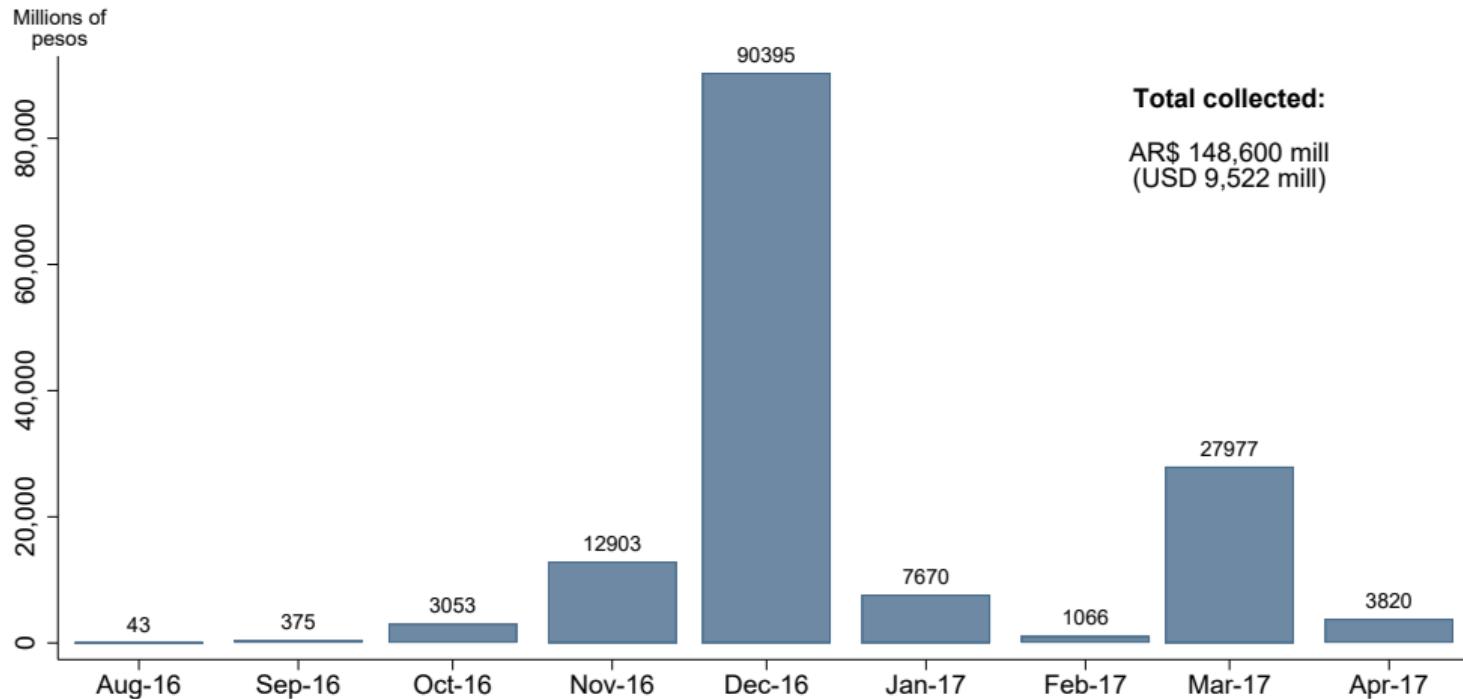
Moreover, conditional on participating, penalty rates do matter (but appear to have a limited effect if **repatriation** is required). Recall the 2016 penalty schedule:

⇒ 10% vs 15% for assets above US\$ 50k if disclosed before or after **Dec 31, 2016**

⇒ 0% if 1/3 disclosed value is invested in **treasury securities** or in domestic **mutual funds** for 5-yr

# Most assets disclosed in Dec 16, before top penalty rate ↑

Revenue from Amnesty's Special Tax



# Salience? Yes

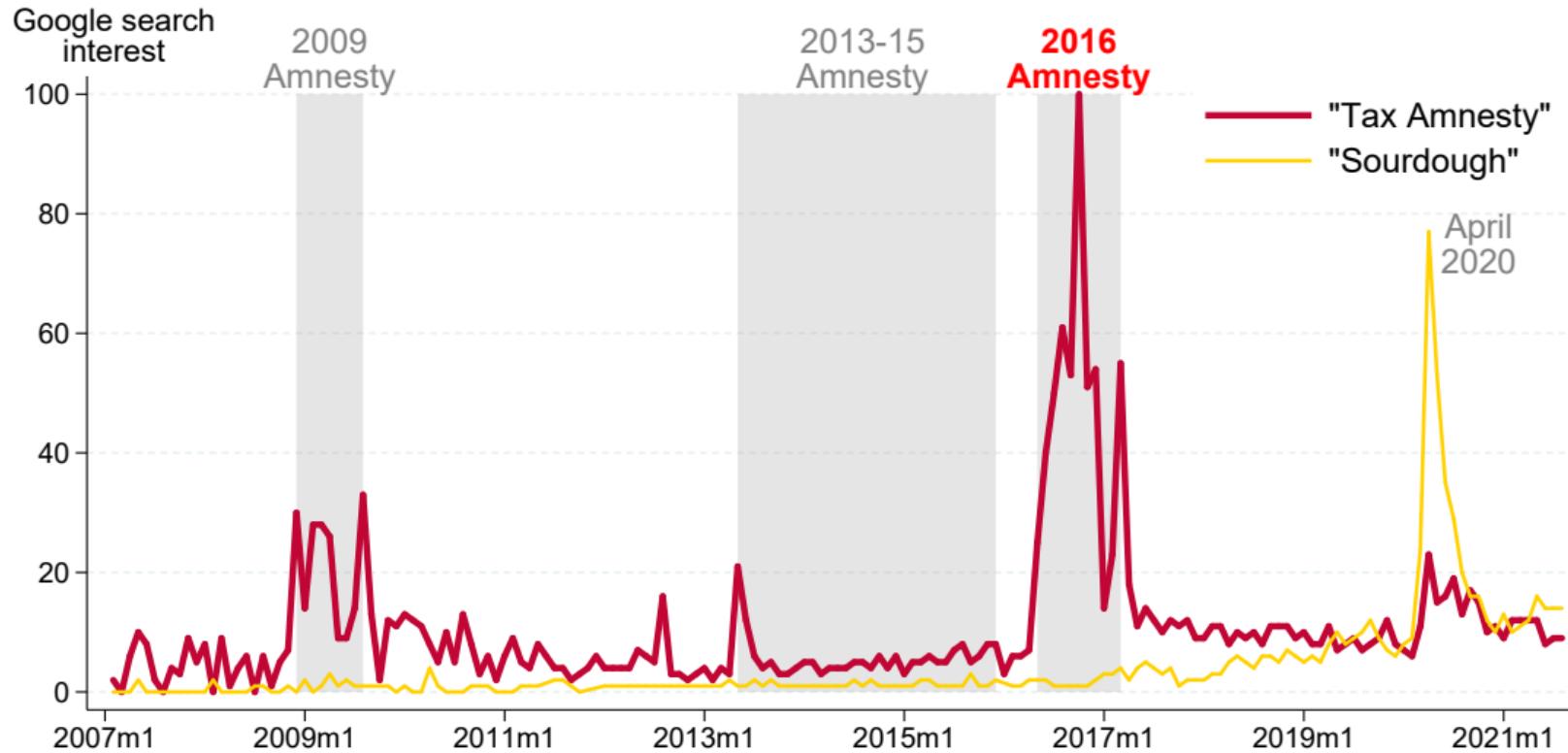
A massive advertisement campaign

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# Salience? Yes

▶ Back



# Low compliance cost? Yes

Screenshot of AFIP's main webpage

Back

The screenshot shows the official website of AFIP (Administración Federal de Ingresos Públicos). The top navigation bar includes the AFIP logo and links for IMPOSITIVA, ADUANA, and SEGURIDAD SOCIAL. The main banner features a modern building and the text "SINCERAMIENTO FISCAL CÓMO DECLARAR BIENES". Below this, a purple box states: "CONOCÉ EN ESTE VIDEO-TUTORIAL EL PASO A PASO PARA INCLUIR TUS BIENES AÚN NO DECLARADOS Y GOZAR DE LOS BENEFICIOS." To the right, a blue box titled "Acceso con CLAVE FISCAL" offers options like "INGRESAR", "SOLICITAR CLAVE", and "CONSEJOS DE SEGURIDAD". At the bottom, a blue bar displays the text "CLAVE DEL DÍA" and "Si declarás bienes que en su totalidad superen los \$ 800.000, podés pagar el impuesto especial mediante la entrega del BONAR17 y/o GLOBAL17. ENTERATE". It also shows a timer: "Te quedan: DÍAS 44 HORAS 06 MIN 27 SEG 36" and the instruction "PARA DEPOSITAR EL EFECTIVO A DECLARAR".

## 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



IMPOSITORIA  
ADUANA  
SEGURIDAD SOCIAL

SINCERAMIENTO FISCAL

## NUEVA APPLICACIÓN PARA SMARTPHONES

YA PODÉS DESCARGAR LA APLICACIÓN DE SINCERAMIENTO FISCAL

CLAVE DEL DÍA

Si declarás bienes que en su totalidad superen los \$ 800.000, podés pagar el impuesto especial mediante la entrega del BONART7 y/o GLOBAL17.

ENTERATE

Te quedan:

DÍAS	HORAS	MIN	SEG
44	06	33	45

PARA DEPOSITAR EL EFECTIVO A DECLARAR

## 2. DECLARACION DE BIENES

PERSONA HUMANA: La tenencia de moneda y bienes deberán ser declaradas en moneda nacional al 22 de julio de 2016  
(Para tenencia y bienes de moneda extranjera [valorar con cotización tipo comprador BNA](#)).

DÓLAR U.S.A = 14,7000 | EURO = 16,5000

Tenencia de moneda en el país

Dinero bancarizado

Inmuebles

Demás Bienes

CALCULAR

# 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

**SINCERAMIENTO FISCAL**

¿TENÉS EFECTIVO SIN DECLARAR?

TENÉS TIEMPO HASTA EL 31 DE OCTUBRE.  
NO TE QUEDES AFUERA. ESTÁS A TIEMPO!

**CLAVE DEL DÍA**  
Hasta el 31 de octubre de 2016, inclusive, podés hacer la declaración voluntaria y excepcional de tenencias de moneda nacional o extranjera en efectivo en el país [Enterate](#)

Te quedan:

DÍAS	18	HORAS	18	MIN	27	SEG	32
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[PARA DEPOSITAR EL EFECTIVO A DECLARAR](#)

## 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?

- ✓ A credible threat of detection thanks to TIEAs and leaks
- ✓ 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
- ✓ High salience thanks to massive info campaign
- ✓ 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 ≈ USD 80B in taxable assets (50% located abroad)  
*Reference: pre-amnesty taxable assets of wealthiest 10k ≈ USD 41B*
  - ⇒ Collected ≈ USD 2.66B (~80% of the projected revenue); ≡ 1 month of VAT revenue
  - ⇒ Non-filers were subject to higher audit rates