

Tax Indulgences: The Scope and Effect of Tax Amnesty

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Amnesty, like fire used to control a forest's growth, is a potentially dangerous tool for revitalizing the tax system. If properly used, however, it can act as a tonic to revitalize the tax system. Although tax amnesty has been tried in numerous instances, amnesty cannot be applied in all tax situations. Rather, it must be tailored to the needs of the particular country and its current tax circumstances. Otherwise, the tax system and administrative machinery may be in worse shape after the amnesty. This paper explores the advantages and disadvantages of the use of amnesty, and when it will be prudent to use this tool.

Amnesty Defined

The dictionary defines amnesty as a general overlooking of pardon of past offenses by the ruling authority. Amnesty is not limited to the tax area. Amnesties have been granted for political offenses, such as draft evasion and treason, and minor offenses, such as a tool to eliminate a backlog of outstanding traffic tickets.

On the surface, overlooking past offenses is the opposite of the goal of tax administrators - who are

charged with collecting the tax owed by citizens and businesses. Forgive and forget does not come easily to tax collectors. The act of amnesty may well send the message that future noncompliance will be condoned. Alternatively, the degree that future noncompliance will be condoned. Alternatively, the degree of one's compliance is subject to negotiation. Hence, when considering amnesty, administrative authorities must weigh the current cost of forgiveness against the future costs of assuring compliance without an amnesty.

A Societal Perspective on Tax Amnesty

From a societal perspective, tax amnesty has three primary benefits and at least one disadvantage. One benefit is that an amnesty allows individuals who violated the tax laws, and continue to evade them because of a fear of being penalized for the initial noncompliance, to become law-abiding taxpayers again.

A second is that an amnesty allows the tax authority to collect some back taxes that it will presumably be unable otherwise to collect. From an administrative

perspective, the amnesty may close the accounts of some taxpayers under investigation, and provide an opportunity to collect tax known to be owed (so-called accounts receivable) more quickly.

Finally, by coupling the amnesty with reform or new compliance measures, the amnesty may encourage greater future compliance. This may include the collection of taxes from current underground activities, thereby increasing the incentive structure to comply.

Against these benefits, an amnesty may annoy honest taxpayers. Some may conclude that it was foolish to comply with the tax law in the first instance, and become less inclined to comply in the future. Others may go further and choose noncompliance, planning to avail themselves of a future amnesty.

Tax administrators generally believe that using an amnesty is unwise because the short-term benefits of amnesty, collecting some additional revenue, will be outweighed by long lasting adverse effects on future compliance.

The exact effect, however, will depend on the terms of the amnesty and whether taxpayers believe the noncompliant are getting special favorable treatment or not. This argument was stated by Dennis Ross, then Deputy Assistant Secretary of the Treasury, in his June, 1985 testimony before a United States Senate Subcommittee.

"[A] Federal amnesty program could have a substantial negative effect on long-term revenues. A taxpayer amnesty, even if described as a 'one-time' program, would

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lead taxpayers to wonder either it might be repeated and thus to question the importance of continued compliance with the tax laws ... an amnesty program would gamble with our tax system's most important asset, the willingness of taxpayers to obey the law. This willingness rests in large part on taxpayers' belief that noncompliance will not be tolerated".

Who will Take Advantage of Amnesty?

By its nature, tax amnesty is a backward-looking device. A taxpayer who did not pay his tax yesterday is being offered some inducements to pay it today, with the promise of no penalty tomorrow.

Amnesty is most likely to be used by taxpayers who experience a combination of fear and/or guilt over the past noncompliance. Fear usually results from possible future discovery, and the consequent economic penalties (and possibly imprisonment), or from societal consequences, such as adverse publicity and its ensuing negative consequences.

For those taxpayers who internally believe that there is a lawful obligation to pay one's taxes, and do not do so, the feeling of guilt may eventually cause them to take remedial action. An often cited example is the possibly apocryphal story of a taxpayer who anonymously sends a check to the tax authorities for the tax authorities for \$1000 with the note that he is having trouble sleeping because of the failure to pay past due taxes.

Those without fear or guilt do not usually respond to a tax amnesty. For example, a smuggler of

contraband or a dealer in illegal drugs is unlikely to worry about the possible adverse effect of failing to report his ill-gotten gains to the tax authorities.

In the long-term, custom and societal pressure for tax compliance will do more than all the laws and compliance schemes that a tax authority can devise. Additionally, if the taxpaying public believes that it is getting a benefit from the government it is funding, overall compliance levels will be high. If not tax noncompliance will be seen as acceptable - with taxpayers' preventing the government from unfairly enriching itself at the hands of the public.

Justifications for Tax Amnesty

By considering a tax amnesty, the government is implicitly admitting that the tax authority has, to some significant degree, failed fully to carry out its function of efficiently collecting all the tax it is charged with collecting. The United States (U.S.) is considered to have one of the most effective tax systems. Internal Revenue Service (IRS) statistics indicate, however, that it only collects about 80% of the taxes it believes are owed each year.

The primary justification offered for a tax amnesty is that the government needs to balance the budget or lessen its deficit, usually due to domestic or international pressure. Alternatively, the government discovers a stream of income that it believes it will not be able otherwise to tax. For example, in 1946 the U.S. Secretary of the Treasury proclaimed a "voluntary disclosure" program in the hope that war profiteers would report their income to the tax authorities.

Although not officially called a tax amnesty, the program was able to collect nearly \$500 million in revenue that might not otherwise have been obtained.

A secondary reason may be to resolve a compliance problem today with the expectation that money will flow in the future. This is the type of situation that a tax administrator will be most likely to support. In this vein, three examples from the United States tax experience come to mind.

First, the Current Tax Payment Act of 1943 forgave three-fourths of the 1942 income tax liabilities of individuals in connection with the shift to the current system of withholding of tax from wages and certain other types of income.

Second, in 1981 the IRS district director in Nevada determined that dealers in gambling houses were not reporting their tip income. Although information about the extent of individual nonreporting was available, the district director offered to overlook past nonreporting if the dealers would in the future report their tip income. The revenue involved was estimated to exceed \$100 million each year. His calculation was that the benefit of future compliance outweighed the cost of auditing past returns.

Third, the Carter Administration's amnesty for Vietnam War period draft evaders forgave tax and penalties for unreported income. In addition, aliens who had resided in the U.S. illegally for a certain time period, and who accepted amnesty for immigration purposes, were implicitly given amnesty with respect to not reporting their income during the period of illegal residency since the IRS was prohibited from using amnesty application files to locate nonfilers.

Measuring the Cost and Effectiveness of an Amnesty

There have been dozens of tax amnesties proclaimed by various countries in this century. Tax administrators generally believe that most tax amnesties have been failures. The interesting questions to examine are what makes an amnesty successful, and when can one characterize an amnesty as a failure. The following amnesties shed light on the answers to these questions.

First, Argentina held a tax amnesty in 1973 that cost about \$200,000 to administer. The amnesty generated \$100,000 in revenue.

Second, the Massachusetts (U.S.) Department of Revenue launched a three month amnesty in October of 1983. The Department of Revenue expected to collect about \$5 million, with its most optimistic estimate \$20 million. The amnesty generated \$85.1 million in revenue, with a direct cost of \$2 million.

Third, in 1981, India held a tax amnesty to encourage holders of black market funds to legalize them by purchasing special government bonds. The government was able to attract over \$1 billion from these bond purchases.

Fourth, a 1988 Irish tax amnesty was expected to raise \$50 million. Ultimately, it raised roughly \$750 million.

Which, if any, of these amnesties can be called a success? If one criterion is the amount of money collected, then an amnesty which collects less than its direct costs unsuccessful. The direct costs are the amounts needed to publicize the amnesty, produce and distribute forms, and process them on receipt. By this criterion, the Argentina

amnesty was a failure.

Argentina lost money because it holds an amnesty every few years, and the 1973 amnesty was not linked to any other changes in the tax system. In the period from 1958-84, Argentina had at least six amnesties. Thus, the response from taxpayers was minimal. An obvious question is, if the Argentine amnesty had managed to collect \$1,000,000, for example, could it have been called a success?

Tax administrators, or Treasury officials, make informal estimates of how much revenue they expect to garner. By this criterion, the Massachusetts, Irish and Indian amnesties were all major successes. The direct costs were only a small portion of the actual amnesty revenue pickup, and the actual revenue collected far exceeded estimates. However, since the three tax authorities made educated guesses as to what the amnesty would collect, does this mean collecting more than the expected amount constitutes success?

Using the net dollar test for Massachusetts, it is unclear what amount of the money collected came from existing accounts receivable, what would have been collected using existing enforcement measures, and how much was new money. By this criterion, some would contend that the amnesty was not nearly as successful as the numbers suggest.

If one assumes that an amnesty may lead to decreased future voluntary compliance because some taxpayers believe the message of an amnesty is that honestly paying one's taxes is unnecessary, the expected revenue loss must be subtracted from the initial revenue pickup to evaluate the effectiveness of the amnesty. In practice,

however, it would be difficult to make an exact estimate of this amount.

Since the Indian amnesty raised \$1 billion, can it be called a success? The Indian government concluded not because the amount raised was below the government's expectation, and the overall tax base was not broadened. The issuance of the bonds was not accompanied by any strengthening of the tax administration or structural reforms. Since the enforcement mechanism was unchanged, delinquent taxpayers had no reason to expect harsher treatment in the future.

The Irish amnesty gave delinquent taxpayers 10 months to pay overdue taxes without incurring any interest or penalty charges. Simultaneously, the government increased the number of tax collectors, and began publishing the names of delinquent taxpayers. Also, reforms were introduced. This was the first tax amnesty held in Ireland.

The Irish Revenue Commissioners were pleased because enforcement measures were strengthened, and the amnesty led to a broadening of the tax base. The Central Bank of Ireland felt the amnesty was a success because it reduced the Treasury's total borrowing requirement to approximately 3.4 percent of gross domestic product (GDP) in 1988, compared with 10 percent in 1987.

Another measure of success is to determine if the overall rate of compliance has increased. By this measure, the Irish and Massachusetts amnesties may be among the few to have succeeded. They raised significant amounts of money, put in new compliance programs, increased resources for

tax administration, and reformed the tax system.

Ultimate Objective of an Amnesty

Although a high yield is a desirable end, the ultimate objective of an amnesty is to improve long-term tax compliance. For whatever reason, some citizens either do not file required tax returns or underreport their income. To some degree, routine compliance programs can deal with these matters.

Unless a person is known to the tax authorities, it is difficult and expensive to determine if one has filed a return. Even if a return has been filed, without receiving and cross-checking third party information, it is not always easy to determine if income has been fully reported. Unless corroborating records are examined, it is nearly impossible to determine if claimed deductions are proper.

It is often easy to identify individuals who are evading taxes, but more difficult to determine how much tax was evaded, and furnish the proof necessary to make an assessment that can withstand judicial scrutiny. Hence, voluntary compliance, be it immediate or late, is the best means of assuring an efficient and healthy tax system.

By their nature, tax authorities do not have the luxury of dwelling on filed returns because of the imminence of the next cycle of filings due within, at most, one year. In practice, the chance of discovery recedes with time as records are disposed of and the tax administration's attention turns to the latest intake of cases and returns.

Whatever monetary amount one puts on the success of an amnesty, the best measure is the degree to

which long-term compliance is increased. For a tax regime in crisis, one also must ask how much the noncompliance rate has declined or stopped.

Amnesty Versus Tax Reform

Tax reform and amnesty may initially appear to be mutually inconsistent. Amnesty aims to remedy past noncompliance, with the taxpayer confessing past indiscretions, making amends and, presumably, being compliant in the future. Tax reform aims instead to change the rules for future compliance. Reform with simpler compliance, tougher penalties and future compliance initiatives may result in bringing nonfilers back into the system, and decrease the nonreporting and underreporting of certain income sources.

Tax reform can be a precursor to a successful amnesty. This was the case in France in 1986. In 1982, France had an amnesty to encourage its citizens to repatriate capital held abroad in violation of its currency control laws. According to French officials, 276 taxpayers participated, and only 151 million francs in back taxes were recovered. One reason the 1982 amnesty failed was that France had a high wealth tax at the time. However, before its 1986 amnesty, the government reduced the tax on repatriated capital to 10 percent, a rate significantly lower than the tax imposed on income, and abolished the wealth tax. The amnesty reportedly increased nonbank private capital inflows by 400 percent in 1986.

An inference from this amnesty is that the terms for repatriating capital were too good to pass up. However, the government may have concluded that to attract the capital

back, it had to be competitive with neighboring countries. Therefore, the need for reforms. With the reforms, the underlying reason for evasion was addressed, and taxpayers were willing to respond positively.

Although some taxpayers will take advantage of amnesty to assuage guilt of past noncompliance or fear of detection for such acts, the group may not be large enough to warrant an amnesty in the eyes of tax administrators. For these types of people, a reform of open amnesty (see *infra*) may be the best solution. The knowledge of future toughened compliance initiatives may act as an inducement for compliance.

Although tax reform is different from amnesty, such a clear distinction is not evident in the minds of many taxpayers. With a reformed tax system, and a belief that compliance will be broadened, an incentive is provided for noncompliant taxpayers to again become compliant. In this situation, tax amnesty can be pictured as the entry fee for returning to the reformed tax regime.

Amnesty as an Element to Promote a Change in Tax Attitude and Behavior

Having a tax amnesty can provide an opportunity to change taxpayer behavior and attitudes toward the tax system. This opportunity must be used carefully, to encourage, rather than discourage, future compliance and respect for the tax administration.

The honest complying taxpayer must be reassured that his compliance has been and will remain the best policy. The message to avoid and refute is that noncompliance can pay. The

question is how to refute this view, while simultaneously shaping taxpayer attitudes and behavior in favor of compliance. Also, the publicity for the amnesty must not be allowed to feed any latent public perception that the tax system is unfair.

The amnesty should be portrayed as a device to make the tax system fairer, with increased overall compliance rates where the tax burden will be more evenly shared by the whole population. Although taxpayers may dislike paying taxes, if the burden is shared by the whole populace, they may be more willing to comply.

If an amnesty is carried out ineptly, taxpayer cynicism will increase. Rather than seeing amnesty as an act of compassion, it will be seen as a sign of weakness or an act of desperation by the tax administration. This could lead to a decrease in long-term compliance, and quickly offset the revenue gain from the amnesty. Taxpayers may begin to perceive paying taxes as a lottery, with the ability to avoid paying one's tax as likely and the chance of discovery as unlikely.

Whatever its view of the amnesty, the tax authority should press for additional resources or adopt reforms that will increase the effectiveness and efficiency of the tax authority, and simplify the burden of compliance. Examples of the former include expanded authority to withhold taxes at source, increased information reporting or simplifications in various existing procedures and regulations.

Credibility and Timing of the Amnesty

How well the amnesty is received will partly depend on the

public perception of the tax administration and its view of the current tax. In a time of cynicism, where the rich are seen as successfully avoiding paying taxes, but the middle class wage earners cannot do likewise, an amnesty alone may be counterproductive. Citizens may perceive the amnesty as a desperate ploy to get some tax dollars from the rich. To avoid this, some highly visible actions against pockets of noncompliance may help.

The theme to stress is, one last chance before the "big guns" are unleashed. If the amnesty is seen merely as a passive attempt to assure compliance, it will fail despite the amount of money collected.

The success of the amnesty will depend upon its perceived results. Can one point to overt successes against tax cheats and the noncompliant? Is there a perception that the system is now fairer? Is the tax authority better able to administer the tax laws evenhandedly?

Massachusetts managed to combine amnesty with an increased emphasis on enforcement. The amnesty period was preceded by seizures of assets from delinquent taxpayers, the closing of delinquent businesses and a substantial increase in penalties. The tax authority also indicated that the amnesty was a one-time chance that would not be repeated. These high visibility enforcement actions impressed on taxpayers that the tax authority would be taking a tougher approach in the future.

The strength of an amnesty is its uniqueness, and the belief that it is a one-time occurrence. By having numerous amnesties, taxpayers may conclude that there are two systems of paying taxes, i.e., the yearly filing or the irregular amnesty filing.

Therefore, a strong argument against an amnesty was the fifth in a series and the Argentinean one was also one of a series.

Depolitization of Tax Amnesty

An elected or politically pointed official usually decides whether to have a tax amnesty. Because of its relatively short tenure, an amnesty may have great appeal since the "extra" revenue is available to meet current needs. Future compliance trends are a lesser concern to such officials. Hence, an alternative solution is feasible.

As part of a philosophy of punishing the sin rather than the sinner, the tax authority should periodically indicate its willingness to craft a workable package for taxpayers who voluntarily come forward but cannot immediately pay the full tax owed. This administrative voluntary disclosure program would remove amnesty from the political realm. Such a taxpayer would file and pay as much of the tax owed as possible, with installment payments for the remainder. This would encourage filing, and possibly keep arrears manageable. This arrangement would be available for nonfilers who voluntarily come forward, and those who amend their tax returns to correct errors and omissions. The program would not be available to game the system for unilateral advantage. Thus, amnesty would not be available to those who have been specifically identified, or are under current investigation, by the tax authority. The key message to remember is that the noncomplying taxpayer must first come forward and confess the sin. Then, forgiveness and rehabilitation are possible.

Such an approach is neither radical nor controversial because tax authorities have the inherent authority to provide amnesty type relief to individual taxpayers. This can be in the form of settling claims and outstanding arrears, sometimes for less than the full amount. In determining arrears, the taxing authority has discretion in assessing, or declining to assess, penalties. For example, Denmark has a standing amnesty, whereby taxpayers who voluntarily disclose errors on past returns will have any penalties associated with the error reduced by one-half. Norway, Sweden, Mexico, Peru and Germany have similar arrangements for taxpayers who come forward voluntarily.

From a business standpoint such a policy makes eminent sense, and eliminates much of the basis for declaring any tax amnesty. It also demonstrates that the tax authority, while it can be severe, can also be compassionate and understanding.

Even with an open amnesty policy, it is not inconsistent to have limited amnesties for specific taxes and purposes. Such a need can arise when a new law or judicial interpretation provides a short time in which to comply, or is confusing to affected taxpayers. An illustrative situation is the IRS attempt to clarify the rules concerning when a worker is an employee rather than an independent contractor for tax purposes. Here, many small businesses face tax adjustments retroactive to all open years, which may be so expensive as to bankrupt many of them. Therefore, consideration is being given to making any changes prospective only—creating a type of amnesty for prior years.

The IRS has had a policy of

voluntary disclosure for most of its existence. Before 1945, internal guidance was provided to tax collectors on how to deal with people who came forward voluntarily. A formal policy to this effect was declared in 1946. Although revoked in 1952, the policy has informally continued to this day. This means that if a taxpayer who is not under investigation voluntarily comes forward, a suitable arrangement can usually be worked out.

Interpretation of the Amnesty

Based on government statements and press reports, the public is usually given an estimate of the money expected to be collected and other goals of the amnesty. After the amnesty, the closeness to reaching these goals will be one determinant of the amnesty's success. Another will be how successfully the tax administration has dealt with pockets of noncompliance. For example, if the public believes that small businessmen continually cheat on their taxes, and the perception continues after the amnesty, the public interpretation may be that the amnesty was unsuccessful.

Also, whatever the true goals and success of the amnesty, its ability to reach a predicted monetary goal will be a key criterion the average citizen uses to judge the amnesty. Regardless of the actual amount, it is an easy measure that will be used by the media to shape public perception.

The tax authority can shape the interpretation of the amnesty by its citizens. The tax authority can act passively, or conduct a high visibility program both to encourage taxpayers to come forward for

amnesty and punish those who do not. This can be accomplished by favorable publicity for those who come forward, and punitive action, such as the seizure of assets and the arrest of the noncompliant in a very public way.

Together with the amnesty, the tax authority should create a link in the minds of taxpayers between the amnesty and another event. For example, with new compliance tools or resources, a major effort will be launched showing that now is the time to get the best deal. Alternatively, with a recent tax reform program, the tax authority would like to give the noncompliant individual one last chance to close the file on his case.

The message must be that the tax administration can afford to be compassionate and grant amnesty because it is strong. At all costs, it must avoid the interpretation that a weak or incompetent tax administration is offering amnesty as an act of desperation.

Tax Amnesty and the Credibility of the Tax System

A factor that will affect the credibility of the tax system is the exact terms the amnesty will provide. If the amnesty will forgo only criminal sanctions and civil penalties, but requires the full payment of back taxes and interest, it can be defended as not providing special treatment to those who come forward. The late paying taxpayer will be in the same position as the honest taxpayer who paid when the tax was first owed. Also, by coming forward, the individual receiving amnesty will presumably be more compliant in the future. In practice, a taxpayer who comes forward voluntarily is unlikely to suffer

prosecution. Also, since penalties are a prod to compliance, the IRS routinely abates penalties for administrative purposes. In terms of dollars, the IRS abated nearly one-half of the penalties it imposed in 1990.

If the amount of the outstanding tax arrears is settled for a fraction of the tax owed, the credibility of the tax administration will suffer. For example, the 1983 Panama amnesty settled outstanding arrears for 20 percent of face value. Guatemala had an amnesty that proposed to settle 1990 and prior year income tax liabilities for the payment of one percent of the individual's 1990 declared gross income. With such terms, the honest taxpayer will rightly feel foolish for having been compliant in the first instance.

In short, the strength of an amnesty is its uniqueness. It should be used for specific and narrow reasons. Use it frequently, and the credibility of the tax administration will suffer. Simultaneously, the taxpayer receiving amnesty must not be perceived as getting better terms than the taxpayer who fully complied with the requirements of the law. If this happens, the credibility of the tax system and levels of compliance will be affected adversely.

Elements of a Successful Amnesty

If an open amnesty policy does not exist, and there is pressure for a "formal" tax amnesty, numerous lessons point to elements that will lead to a "successful" tax amnesty.

First, a general tax amnesty should not be a normal occurrence. Whatever one's view of the utility

of an amnesty, its novelty can be a factor in its success. This was demonstrated by the Irish and Massachusetts tax amnesties. If taxpayers believe an amnesty will occur periodically, the implicit message is that there are two ways to pay taxes--through the regular filing cycle or the irregular amnesty cycle. Hence, stress that the amnesty will only occur once in a lifetime--not to be repeated.

Second, since amnesty is the carrot, some sort of stick should also be provided. This can come in two forms. One is the promise of stronger and more punitive measures for noncompliance after the amnesty is over. In other words, tougher laws and enhanced enforcement strategies. The other is to engage in high visibility enforcement strategies. The other is to engage in high visibility enforcement actions against pockets of current noncompliance. The message is that some taxpayers are suffering because they have not yet taken advantage of the current amnesty: What about you who have not yet done so--get to us before we get to you. Time is running out.

Third, since a wide-scale amnesty is a departure from normal procedures, its duration should not be long. However, it should be long enough to notify the taxpaying public of its existence, and provide time to come forward. It should not be so lengthy as to encourage procrastination.

There is an obvious tension between an ongoing amnesty, which forgives the disobedient, and routine compliance and enforcement efforts, which attempt to locate and punish violators. Hence, from the

perspective of tax administrators, a amnesty should be no more than two or three months in duration, and exclude those who have already been identified as noncompliant by the taxing authority.

Fourth, since an amnesty arguably requires activities additional to the normal utilization of resources, additional funding should be secured for the amnesty. This would be expended on advertising, printing forms and materials, processing amnesty requests, investigating dubious claims, and spotchecks of the filings. Also, rather than reallocating resources from current compliance activities, additional persons should be hired temporarily to run the amnesty. It should not be carried out during or conflict with the primary filing season.

Fifth, a tough post amnesty enforcement climate should be implemented after the amnesty ends. Whatever the weaknesses of the preamnesty regime, the message must be that there will be a new, more effective way of doing things.

Conclusion

Amnesty is a controversial and often used tool of tax administrators. It is not a panacea, and not a substitute for a healthy and effective tax administration. To be successful, an amnesty must take into account taxpayer perceptions, local needs and conditions. Often, this is not done. In many instances, the obvious, but often ignored, conclusion is that amnesty should be avoided because it will not enhance the effectiveness of the tax administration.

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