

Research Article

An Intelligent Accounting-legal Simulation Model for Proactive Resolution of Tax Disputes: Empirical and Comparative Evidence from Egypt

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Abstract

This study develops a smart accounting–legal reform model to prevent tax disputes in Egypt by integrating high-quality accounting information, digital audit trails, and simulation-based decision support. A mixed-methods design combines a structured survey of taxpayers, CPAs, and tax officers ($n \approx 280$), semi-structured interviews, and a multi-agent simulation calibrated to sectoral risk patterns. The empirical results show that weak documentation and fragmented IT systems are the primary drivers of recurring disputes; by contrast, e-filing/e-audit and early mediation shorten resolution time and reduce escalation. The simulation forecasts that embedding AI-enabled risk scoring and CPA-facilitated pre-assessment reconciliation can lower dispute frequency by 25–30% over five years, while cutting administrative costs relative to litigation. Comparative benchmarks (UK ADR, Canada digital compliance audits, Australia independent pre-litigation review) corroborate the preventive governance approach and inform implementation priorities for Egypt. The paper contributes theoretically by linking accounting information quality, agency incentives, and preventive governance within a simulation-driven framework; and practically by offering an actionable roadmap-digital mediation platform, SME documentation standards, targeted training, and sector-focused pilots-to institutionalize proactive dispute resolution. Overall, the findings demonstrate that sustainable reform depends less on temporary settlement laws and more on accounting transparency, intelligent analytics, and trust-building procedures embedded in everyday administration.

Keywords

Simulation Model, Tax Disputes, Accounting Reform, Digital Governance, Egypt, Preventive Compliance

1. Introduction

1.1. Background

Tax disputes represent one of the most persistent challenges to fiscal stability and governance in emerging economies. In Egypt, recurrent conflicts between taxpayers and the Tax

Authority have not only drained institutional resources but also undermined public trust in the equity and efficiency of the tax system. Despite successive legislative interventions-such as Law 79/2016 on the settlement of disputes under litigation and Law 160/2024 extending temporary mechanisms for reconciliation-these initiatives largely addressed

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symptoms rather than structural causes (OECD, 2022). The persistence of disputes reveals systemic weaknesses in accounting documentation, audit practices, and digital traceability.

Globally, tax dispute resolution has evolved from reactive, litigation-heavy frameworks toward proactive, preventive governance models that integrate accounting transparency and digital technologies. For example, the United Kingdom's HMRC has institutionalized Alternative Dispute Resolution (ADR) with the support of independent facilitators, reducing costly litigation [35]. Similarly, Canada and Australia have invested in real-time digital audit platforms, leveraging data analytics to predict disputes before escalation (CRA, 2020; ATO, 2023). These experiences highlight the value of accounting-based reforms that embed preventive mechanisms within tax administration.

Egypt, in contrast, continues to rely on repetitive legislative "fixes," often prolonging disputes rather than eliminating them. This study therefore situates the problem of tax disputes within an accounting perspective, highlighting deficiencies in financial reporting quality, audit trails, and documentation standards as primary drivers of conflict. It advances the argument that a smart accounting–legal reform model can transform dispute resolution from a reactive judicial process into a proactive governance system rooted in sustainable digital transformation.

1.2. Problem Statement

Despite successive attempts at reform, Egypt's tax dispute management framework remains reactive, fragmented, and heavily dependent on temporary legislative extensions. Three critical issues emerge:

- 1) Repetition of temporary laws: Legislative measures like Law 5/2025, which sought to resolve disputes predating 2020, repeated the cycle of temporary amnesty without addressing root causes of disputes (World Bank, 2021).
- 2) Accounting deficiencies: Poor-quality bookkeeping, inconsistent application of accounting standards, and reliance on manual documentation hinder dispute prevention. Weak accounting infrastructure exacerbates disputes related to underreporting, tax base estimation, and audit risk assessments [22].
- 3) Lack of preventive digital governance: Egypt has yet to fully embed e-filing, e-audit, and predictive analytics into its dispute resolution framework, limiting the ability of the Tax Authority to foresee and prevent disputes [6].

As a result, disputes remain costly, prolonged, and socially disruptive. The absence of accounting-driven preventive governance perpetuates taxpayer mistrust and reduces voluntary compliance.

1.3. Research Objectives

This research aims to bridge the gap between accounting

scholarship, empirical practice, and legislative reform. The specific objectives are:

- 1) To diagnose the root accounting and administrative causes of tax disputes in Egypt through empirical evidence and case studies.
- 2) To design an intelligent simulation model that integrates accounting quality indicators, audit risk predictors, and legal mediation protocols.
- 3) To test the model empirically with stakeholders (CPAs, tax officers, taxpayers) and compare its performance with international best practices.
- 4) To propose a preventive legal reform framework that institutionalizes digital mediation, accounting traceability, and sustainable governance in Egypt's tax system.

1.4. Research Questions

The study is guided by the following questions:

- 1) What are the accounting and administrative roots of tax disputes in Egypt?
- 2) Why have temporary legal reforms failed to prevent recurrence?
- 3) How can accounting-based simulation models contribute to proactive dispute prevention?
- 4) What lessons can Egypt draw from comparative international experiences in dispute resolution (e.g., UK ADR, Canada digital audits, Australia pre-litigation reviews)?
- 5) How can the proposed model be institutionalized as part of a sustainable legal reform framework under Egypt Vision 2030?

1.5. Significance and Research Gap

This research is significant for several reasons:

- 1) Theoretical contribution: Existing literature on tax disputes often prioritizes legal frameworks or administrative efficiency, neglecting the central role of accounting quality (Bryman & Bell, 2015). By grounding dispute prevention in financial reporting transparency, this study expands accounting scholarship.
- 2) Policy relevance: Egypt's reliance on temporary laws has failed to generate lasting impact. A smart accounting–legal reform model introduces a forward-looking, preventive paradigm aligned with global best practices (Christensen et al., 2014).
- 3) Comparative value: While advanced economies have implemented ADR and predictive audits, few studies have systematically compared these experiences with the Egyptian context [7].
- 4) Digital innovation: The integration of simulation models and AI-driven analytics into tax governance represents a novel contribution, providing policymakers with a practical tool to predict and prevent disputes.

The research gap lies at the intersection of accounting,

taxation, and governance: How can accounting data quality, supported by digital technologies, transform dispute resolution from reactive litigation into proactive prevention?

1.6. Scope and Limitations

The study focuses on Egypt's income tax disputes between taxpayers and the Tax Authority. It emphasizes the accounting-financial perspective rather than pure legal adjudication. While comparative international case studies (UK, Canada, Australia) are incorporated, the empirical component is limited to Egypt due to data access constraints. The research also acknowledges potential limitations in stakeholder responses, as survey and interview participants may exhibit biases based on institutional affiliations.

1.7. Structure of the Study

The research is structured into ten chapters:

- 1) Introduction: Background, problem statement, objectives, questions, significance.
- 2) Literature Review: Tax disputes, accounting quality, digital auditing, and international practices.
- 3) Theoretical Framework: Accounting information quality, agency theory, preventive governance, DSS, behavioral compliance.
- 4) Proposed Model: Simulation design, dynamics, intelligent features, outputs.
- 5) Methodology: Research design, population, instruments, hypotheses, data analysis tools.
- 6) Findings and Analysis: Survey, interviews, hypothesis testing.
- 7) Case Studies and Comparative Insights: Egypt, UK, Canada, Australia.
- 8) Discussion and Application: Interpretation, model application, policy innovation.
- 9) Recommendations: Policy, practical, and legal reform strategies.
- 10) Conclusion: Core findings, validation of the model, and future research directions.

2. Literature Review

2.1. Nature of Tax Disputes

2.1.1. Definition, Forms, and Sources

Tax disputes are conflicts arising from differences in interpretation, reporting, or enforcement of tax obligations between taxpayers and the authorities. They typically occur due to underreporting of income, estimation challenges, unclear accounting documentation, or disputes over deductible expenses (OECD, 2022). Globally, disputes take different forms: assessment disputes, penalty appeals, transfer pricing issues, and litigation related to VAT or corporate income

taxes.

In Egypt, disputes are often concentrated in corporate taxation, especially in real estate, construction, and wholesale sectors. Weak bookkeeping practices, reliance on manual estimations, and inconsistencies in audit procedures increase the likelihood of conflict (World Bank, 2021).

2.1.2. Literature on Tax Compliance and Dispute Management

The literature highlights tax compliance as a behavioral and institutional challenge. Scholars such as Alm (2019) and Kirchler (2007) emphasize that compliance is shaped by trust in institutions, perceived fairness, and the quality of enforcement. Poor dispute management erodes voluntary compliance, pushing taxpayers into defensive litigation.

International evidence shows that early mediation reduces litigation costs and enhances compliance [35]. Conversely, Egypt's reliance on temporary laws-such as Law 79/2016 and Law 160/2024-has been criticized for addressing symptoms rather than structural weaknesses (Amin & El-Shahat, 2021).

2.2. The Role of Accounting and Financial Reporting

Impact of Accounting Quality and Digital Bookkeeping on Dispute Prevention

The quality of accounting information plays a central role in dispute prediction and resolution. DeFond & Zhang (2014) argue that transparent financial reporting reduces disputes by aligning expectations between taxpayers and authorities. Weak or inconsistent accounting, on the other hand, fuels estimation-based disputes.

In emerging economies, the lack of standardized documentation frameworks exacerbates conflicts (Christensen et al., 2014). Studies on digital bookkeeping highlight that e-filing and e-audit systems improve transparency, traceability, and early detection of errors, thereby reducing disputes [6].

Egypt lags behind in embedding digital accounting systems across SMEs, leading to recurrent disputes with small and medium taxpayers [1].

2.3. Simulation Models in Public Finance

2.3.1. Agent-based, Monte Carlo, and System Dynamics in Dispute Prediction

Simulation models have emerged as powerful tools for predicting disputes and testing policy scenarios. Agent-based models simulate interactions between taxpayers, auditors, and institutions (Epstein, 2006). Monte Carlo simulations are used to assess uncertainty in tax estimations, while system dynamics models provide insight into dispute escalation timelines (Stermann, 2000).

2.3.2. Integration with AI and Intelligent Feedback Loops

AI-enhanced simulations introduce feedback loops that continuously adjust parameters based on observed outcomes. Explainable AI (XAI) improves transparency, making models more acceptable to policymakers and taxpayers [7]. Applications in Canada and Singapore show how predictive analytics can flag potential disputes, allowing authorities to intervene early [20].

2.4. Case Studies from Egypt

2.4.1. Legal History and Administrative Structure

Egypt's dispute management has historically relied on legislative "quick fixes." The repeated extension of settlement laws since 2016 reflects a pattern of short-term solutions (OECD, 2022). Administrative structures remain fragmented, with limited capacity for real-time data analysis.

2.4.2. Weaknesses in Reconciliation, Pre-assessment, and Data Systems

- 1) Reconciliation gaps: Taxpayers rarely receive clear reconciliations before disputes escalate.
- 2) Pre-assessment communication failures: Weak taxpayer–auditor communication results in surprise assessments.
- 3) Data fragmentation: Manual files and siloed IT systems hinder dispute prediction.

These weaknesses explain why temporary laws have failed to resolve disputes sustainably (World Bank, 2021).

2.5. International Benchmarking and Best Practices

2.5.1. UK HMRC's ADR Model

The UK pioneered ADR in tax disputes, offering facilitated negotiations before litigation. Studies show ADR reduced case backlogs by 35% [35].

2.5.2. Canada's Digital Compliance Audits

Canada's CRA integrates predictive analytics with taxpayer records, identifying disputes early. Digital audit trails allow transparent reconciliations [20].

2.5.3. Australia's Independent Pre-litigation Reviews

Australia emphasizes independent reviews before disputes reach courts, reducing litigation costs and encouraging compliance (ATO, 2023).

2.5.4. OECD Recommendations on Tax Administration Reform

The OECD stresses preventive governance, digital trans-

formation, and taxpayer trust as pillars of effective dispute management (OECD, 2022). These lessons are directly relevant to Egypt's context.

Summary

The literature confirms that Egypt's tax dispute problem is systemic, rooted in weak accounting practices, fragmented administration, and reliance on temporary laws. Comparative international evidence demonstrates that preventive, accounting-based, and digital governance frameworks are more effective in reducing disputes. This gap forms the foundation for the proposed smart accounting–legal reform model tested in this research.

3. Theoretical Framework

3.1. Accounting Information Quality Theory

The foundation of this research rests on the quality of accounting information and its role in reducing disputes. High-quality accounting information ensures that taxpayers present transparent, reliable, and comparable data to tax authorities. According to DeFond and Zhang (2014), robust accounting systems reduce the scope for discretionary judgments, thereby lowering conflict risk. When accounting quality is poor, disputes emerge over income recognition, expense allocations, and valuation of assets.

Egypt's tax disputes are often linked to documentation gaps and weak enforcement of Egyptian Accounting Standards (EAS). Abdelsalam and Weetman (2019) argue that in developing economies, financial reporting standards are inconsistently applied, resulting in information asymmetry. This study situates accounting quality as a predictor variable in dispute prevention, supported by empirical evidence and simulation modeling.

3.2. Agency Theory

Agency theory explains conflicts arising between principals (taxpayers) and agents (tax authorities). Taxpayers seek to minimize liabilities, while the state maximizes revenue collection [38]. Disputes therefore stem from goal misalignment and information asymmetry.

Research shows that monitoring mechanisms such as audits reduce agency costs but may also generate disputes when audit methodologies lack transparency (Christensen et al., 2014). This study integrates agency theory to highlight the structural incentives behind disputes, and demonstrates how a smart simulation model can realign taxpayer–authority relationships through pre-dispute mediation, accounting transparency, and digital monitoring.

3.3. Preventive Governance Theory

Preventive governance emphasizes anticipation rather than reaction. Instead of resolving disputes after escalation, insti-

tutions should predict and prevent them. The OECD (2022) defines preventive governance as “embedding foresight and risk prediction into administrative decision-making.”

In taxation, preventive governance involves:

- 1) Early warning systems (identifying disputes before they escalate).
- 2) Mediation protocols (resolving disagreements at the earliest stage).
- 3) Stakeholder trust-building (ensuring taxpayers perceive fairness).

Egypt’s reliance on reactive laws has failed to prevent recurrence. By adopting preventive governance, the proposed model shifts the paradigm toward long-term sustainability and efficiency, consistent with Egypt Vision 2030 and global best practices (World Bank, 2021).

3.4. Simulation-based Decision Support Systems (DSS)

Simulation models are increasingly applied in accounting and public finance as decision support systems (DSS). Sterman (2000) emphasizes that simulation allows policymakers to test scenarios, predict risks, and optimize policy outcomes. In tax dispute management, simulation can model interactions between taxpayers, auditors, and institutions using real data.

Key approaches include:

- 1) Agent-based models: simulate taxpayer–auditor dynamics (Epstein, 2006).
- 2) Monte Carlo models: quantify risk in uncertain environments (Harrison, 2015).
- 3) System dynamics: map feedback loops in dispute escalation (Sterman, 2000).

When integrated with AI and accounting data, simulation-based DSS provide a proactive platform to forecast disputes and recommend policy interventions [7].

3.5. Behavioral Taxpayer Compliance Model

The behavioral approach emphasizes that compliance is influenced not only by enforcement but also by psychological and social factors. Kirchler (2007) introduced the “slippery slope framework,” which argues that compliance increases when trust and power are balanced. Excessive reliance on deterrence may provoke resistance, whereas fairness and transparency enhance voluntary compliance.

In Egypt, distrust of tax administration is a key factor behind disputes (Amin & El-Shahat, 2021). Embedding accounting quality and digital mediation into governance builds trust by providing taxpayers with clear, traceable data. The proposed model therefore combines behavioral insights with accounting and simulation theories to develop a holistic framework for proactive dispute prevention.

Summary of Chapter 3

This chapter integrates five theoretical perspectives:

- 1) Accounting Information Quality Theory explains how

documentation and transparency reduce disputes.

- 2) Agency Theory highlights conflicts of interest between taxpayers and authorities.
- 3) Preventive Governance Theory emphasizes anticipation and sustainability.
- 4) Simulation-Based DSS illustrates how predictive models support decision-making.
- 5) Behavioral Compliance Models account for trust, fairness, and taxpayer psychology.

Together, these theories provide a comprehensive foundation for the smart accounting–legal reform model, ensuring that it is academically rigorous, empirically grounded, and policy-relevant.

4. The Proposed Model

4.1. Conceptual Design of the Simulation Model

The proposed model is an accounting-based intelligent simulation system designed to proactively diagnose, predict, and resolve tax disputes in Egypt. Its foundation rests on the principle that accounting data quality and digital traceability are central to dispute prevention. Unlike reactive legal frameworks that intervene post-dispute, the model integrates real-time data flows between taxpayers, Certified Public Accountants (CPAs), and the Tax Authority.

The conceptual architecture adopts a multi-agent framework:

- 1) Taxpayer agent: provides digital bookkeeping, standardized tax declarations, and supporting documentation.
- 2) CPA agent: ensures compliance with accounting standards, validates records, and facilitates pre-dispute reconciliation.
- 3) Tax Authority agent: monitors, evaluates, and predicts disputes through risk assessment algorithms.

This tri-agent system reduces information asymmetry [38] and builds mutual trust by embedding accounting quality at the core of governance.

4.2. Model Dynamics and Inputs

The model integrates dynamic simulations that mirror real-world dispute processes. Key inputs include:

- 1) Accounting data quality indicators: accuracy of financial statements, timeliness of submission, and adherence to standards [22].
- 2) Tax gap predictors: underreporting ratios, sector-specific risk scores, and historical compliance patterns (OECD, 2022).
- 3) Administrative triggers: audit selections, communication delays, and reconciliation records.

Simulation is powered by:

- 1) Agent-based modeling to replicate taxpayer–auditor–CPA interactions (Epstein, 2006).
- 2) Monte Carlo analysis for uncertainty in tax estimations

(Harrison, 2015).

- 3) System dynamics to map feedback loops in dispute escalation (Stermann, 2000).

This dynamic environment enables “what-if” testing of policy interventions, allowing Egypt’s Tax Authority to forecast dispute outcomes under different scenarios.

4.3. Intelligent Features

The strength of the model lies in its intelligent, adaptive features:

4.3.1. Self-adjusting Parameters

The model recalibrates dispute probability scores using historical resolution data. For example, if reconciliation sessions in the construction sector consistently fail, the model raises risk scores for future construction audits.

4.3.2. Feedback Loops from Past Disputes

The system integrates continuous learning mechanisms. Lessons from previous disputes—such as recurring documentation gaps or valuation disagreements—are fed back into the simulation to refine dispute prediction [7].

4.3.3. Machine Learning from Dispute Databases

By applying supervised learning on Egypt’s dispute archives, the model identifies common patterns, such as late submissions or mismatched invoices. AI-enhanced prediction tools provide early warnings, directing CPAs and taxpayers to resolve potential issues before escalation [6].

4.4. Expected Outputs and Applications

4.4.1. Predictive Risk Maps

The model generates heat maps of dispute risks across sectors, highlighting industries with high likelihood of disputes (e.g., construction, wholesale). This assists policymakers in targeting preventive reforms.

4.4.2. Scenario Analysis of Reforms

Simulation outputs provide evidence-based forecasts of legal reforms. For example, the model can test whether mandating CPA validation for SMEs reduces disputes by 30% over five years. This strengthens legislative decision-making (Christensen et al., 2014).

4.4.3. Cost-benefit Forecasts

The model projects savings from preventive governance. By shifting from litigation (avg. 14 months per dispute) to mediation (avg. 3 months), the model estimates a 70% reduction in administrative costs (World Bank, 2021).

Summary of Chapter 4

The proposed model offers a comprehensive, intelligent,

and preventive system. By combining accounting transparency, simulation modeling, and AI-driven analytics, it creates a proactive platform for dispute resolution. Its architecture is designed not only to predict disputes but also to provide actionable insights for sustainable tax governance reform in Egypt.

5. Methodology and Empirical Research Design

5.1. Research Design

This study adopts a mixed-methods research design, combining quantitative and qualitative approaches to ensure robust, triangulated evidence. The rationale is that no single method can fully capture the multi-dimensional drivers of tax disputes in Egypt [21].

- 1) Quantitative Component: A structured survey is administered to taxpayers, CPAs, and tax officers to capture statistical patterns regarding dispute types, frequency, and perceived causes. Statistical modeling, including regression and Structural Equation Modeling (SEM), is employed to test hypotheses on the relationship between accounting quality, digital transformation, and dispute outcomes [31].
- 2) Qualitative Component: Semi-structured interviews are conducted with key stakeholders to gain deeper insights into dispute dynamics, negotiation failures, and perceptions of fairness. Case studies of selected disputes provide context-specific evidence (Yin, 2018).
- 3) Simulation Component: An agent-based simulation integrates quantitative and qualitative data, modeling interactions between taxpayers, CPAs, and the Tax Authority to predict potential dispute trajectories (Epstein, 2006).

This triangulated design enhances both validity and reliability, allowing the study to move beyond descriptive analysis toward predictive and prescriptive insights.

5.2. Population and Sample

5.2.1. Target Population

The research targets four primary groups:

- 1) Tax officers: officials responsible for audits, assessments, and dispute resolution.
- 2) Certified Public Accountants (CPAs) and tax consultants: intermediaries who prepare taxpayer records and represent clients.
- 3) Business taxpayers: particularly SMEs and corporations in high-dispute sectors such as construction, wholesale, and real estate.
- 4) Ministry of Finance staff: policymakers and administrators engaged in tax policy design.

5.2.2. Sampling Strategy

A stratified purposive sampling approach is applied, ensuring proportional representation across stakeholder categories. Within strata, random sampling is conducted to minimize bias. The final sample includes 250–300 participants: 100 taxpayers, 80 CPAs, 50 tax officers, and 30 policymakers. This sample size is sufficient for both SEM analysis and meaningful qualitative insights (Bryman & Bell, 2015).

5.3. Research Instruments

5.3.1. Structured Survey

A questionnaire combines Likert-scale items and open-ended questions. Constructs measured include:

- 1) Perceived quality of accounting documentation.
- 2) Effectiveness of digital tools (e-filing, e-audit).
- 3) Fairness and efficiency of dispute resolution processes.

5.3.2. Interview Guide

Semi-structured interviews with 20 participants allow probing into dispute narratives, including failures of reconciliation, law interpretation issues, and audit estimation disputes.

5.3.3. Simulation Scenario Sheets

Designed to feed real dispute data into the model, scenarios test how disputes evolve under different policy environments-e.g., introduction of mandatory CPA validation or implementation of predictive analytics systems.

5.4. Hypotheses

The research tests three core hypotheses:

- 1) H1: Weak accounting quality significantly correlates with increased dispute frequency [22].
- 2) H2: Digital transformation of audit trails reduces dispute duration and escalation [6].
- 3) H3: Simulation-based feedback systems improve dispute prevention efficiency [7].

Each hypothesis is operationalized with measurable indicators, enabling empirical validation through both statistical and simulation analysis.

5.5. Data Analysis Tools

5.5.1. Descriptive Statistics

Frequencies and cross-tabulations summarize the types, causes, and frequency of disputes.

5.5.2. Regression and SEM Modeling

Regression models test correlations between accounting quality and disputes, while Structural Equation Modeling (SEM) explores causal relationships across multiple variables simultaneously [31].

5.5.3. Thematic Content Analysis

Interview transcripts are coded to identify recurring themes, such as “documentation gaps,” “delays in reconciliation,” and “audit overreach” (Braun & Clarke, 2006).

5.5.4. Simulation Metrics

Outputs from the simulation model include dispute timelines, resolution probabilities, and cost-benefit forecasts. These metrics are benchmarked against international case studies (OECD, 2022; ATO, 2023).

Summary

This mixed-method design ensures that the study is empirically rigorous and policy-relevant. By combining surveys, interviews, and simulation modeling, the research addresses both quantitative patterns and qualitative dynamics of disputes. Importantly, the methodology bridges accounting research with practical governance, ensuring that findings can inform sustainable, preventive reform in Egypt.

Taxpayers, CPAs, tax officers, and policymakers, then random selection within strata (target $n=250-300$; achieved $n\approx 280$). The SEM tested three latent constructs-Accounting Quality, Digital Transformation, and Dispute Outcomes-with reflective indicators. Model estimation used ML with robust standard errors. Fit indices indicate good fit: $\chi^2/df < 3.0$, $CFI \geq 0.95$, $TLI \geq 0.94$, $RMSEA \leq 0.06$, $SRMR \leq 0.08$. Discriminant validity was verified via HTMT < 0.85 , and reliability via composite reliability ≥ 0.70 . Simulation parameters were calibrated using sectoral dispute rates from the empirical sample and sensitivity-tested via Monte Carlo runs (1,000 iterations).

6. Findings and Empirical Analysis

6.1. Survey Results

6.1.1. Frequencies of Dispute Types

The survey of 280 respondents (100 taxpayers, 80 CPAs, 70 tax officers, 30 policymakers) revealed the following distribution of disputes:

- 1) Income underreporting disputes: 35%
- 2) Disallowance of expenses: 22%
- 3) VAT calculation disputes: 18%
- 4) Transfer pricing/valuation issues: 15%
- 5) Other disputes (penalties, timing differences): 10%

This distribution reflects the dominance of accounting-related documentation gaps. Respondents noted that weak audit trails and inconsistent application of standards were the most common triggers of disputes, echoing DeFond & Zhang’s (2014) findings on the role of accounting quality.

6.1.2. Factors Reported by Taxpayers and CPAs

Key drivers of disputes identified in surveys include:

- 1) Documentation quality issues (76% of CPAs reported missing or incomplete records).

- 2) Tax estimation practices (65% of taxpayers perceived estimates as “arbitrary”).
- 3) Weak pre-assessment communication (72% noted absence of reconciliation before assessments).
- 4) Delays in dispute settlement (average 14 months per case).

These findings are consistent with international literature emphasizing the importance of transparent accounting systems and mediation (Kirchler, 2007; OECD, 2022).

6.1.3. Institutional Delays and Procedural Gaps

Tax officers highlighted administrative challenges:

- 1) Case overload per officer (average of 180 disputes annually).
- 2) Fragmented IT systems preventing data sharing.
- 3) Reliance on manual paper trails in 60% of disputes.

Such systemic weaknesses align with earlier critiques of Egypt’s tax administration (World Bank, 2021).

6.2. Interview Insights

6.2.1. Real Narratives About Dispute Dynamics

Interviews with CPAs and taxpayers revealed the human dimension of disputes. One CPA described:

“We often face disputes not because taxpayers intend to evade but because documentation is missing, and tax officers rely on estimates. Without digital records, disagreements are inevitable.”

Another taxpayer stated:

“By the time we receive assessment notifications, penalties have already accumulated. Early dialogue could have avoided escalation.”

These narratives highlight the lack of preventive mediation mechanisms in Egypt, contrasting with practices in the UK and Australia where ADR and pre-litigation reviews are institutionalized (HMRC, 2021; ATO, 2023).

6.2.2. Misunderstandings of Law and Audit Estimates

Interviews also revealed widespread misinterpretation of legal provisions. Many CPAs reported inconsistent guidance from the Tax Authority, leading to “interpretive disputes” rather than factual disagreements. Tax officers admitted relying on “rough estimates” due to incomplete taxpayer records. These insights corroborate the survey results that disputes are rooted in accounting and documentation quality rather than deliberate evasion.

6.3. Hypotheses Testing

6.3.1. Statistical Validation of H1–H3

The hypotheses were tested using regression and SEM modeling.

- 1) H1 (Accounting quality and dispute frequency): Strong evidence supported H1. Poor accounting documentation

was significantly correlated with higher dispute incidence ($\beta = 0.42$, $p < 0.001$).

- 2) H2 (Digital transformation and dispute duration): Adoption of e-filing and e-audit reduced dispute resolution time by an average of 38% ($\beta = -0.35$, $p < 0.01$).
- 3) H3 (Simulation-based systems and prevention): Simulation scenarios predicted that embedding AI-driven risk scoring could reduce disputes by 25–30% over five years.

These results validate the theoretical framework that disputes are not merely legal phenomena but are deeply embedded in accounting infrastructure and digital governance.

6.3.2. Visualizations of Dispute Timelines and Drivers

Simulation outputs generated dispute timelines, showing average progression from assessment to litigation:

- 1) Initial audit trigger → 2 months
- 2) Assessment issued → 3 months
- 3) Objection filed → 6 months
- 4) Court/litigation → 14 months

When pre-dispute mediation was simulated, the timeline reduced to 3–4 months, demonstrating the cost-effectiveness of preventive models.

6.3.3. Comparative Evidence

Benchmarking Egypt against international practices confirmed the findings:

- 1) In the UK, ADR reduced litigation backlog by 35% [35].
- 2) In Canada, digital compliance audits flagged 22% of disputes before escalation [20].
- 3) In Australia, independent reviews cut average dispute duration by 40% (ATO, 2023).

Egypt’s reliance on repetitive temporary laws stands in stark contrast to these preventive systems.

Summary

The findings confirm that:

- 1) Weak accounting quality and poor documentation are the root causes of disputes.
- 2) Digital tools and early mediation significantly shorten dispute duration.
- 3) Simulation models provide predictive capabilities, enabling preventive governance.

Together, these results validate the proposed smart accounting–legal reform model as a credible path toward sustainable tax dispute resolution in Egypt.

7. Case Studies and Comparative Insights

7.1. Selected Egyptian Case Studies

7.1.1. Disputes in the Construction Sector

The construction industry in Egypt has historically been

one of the most dispute-prone sectors due to complex contracts, delayed documentation, and irregular bookkeeping. A review of 50 disputes filed in Cairo Tax Courts (2018–2022) showed recurring disagreements over revenue recognition timing and deductibility of subcontractor expenses.

- 1) In most cases, the Tax Authority rejected cost claims due to incomplete invoices, while taxpayers insisted on industry-standard practices.
- 2) The absence of digital audit trails made it difficult to reconcile discrepancies.

This aligns with international literature that accounting transparency is the strongest preventive mechanism in complex sectors (Christensen et al., 2014). Had a simulation-based early warning system been applied, disputes could have been identified during reconciliation rather than escalating into litigation.

7.1.2. Wholesale and Retail Trade Disputes

Wholesale trade disputes often stemmed from inventory misreporting and VAT mismatches. In 2019, a high-profile dispute involved a major wholesale firm where auditors claimed underreporting of EGP 40 million. The taxpayer argued that paper-based inventory systems could not capture rapid turnover of goods.

- 1) Mediation attempts failed because there was no formal pre-assessment dialogue.
- 2) The dispute dragged on for over 24 months, costing both sides substantial legal fees.

International experiences [20] show that digital compliance audits in Canada resolve similar disputes within three months by cross-referencing electronic invoices. This highlights the gap in Egypt's reliance on manual reconciliation.

7.1.3. Real Estate Valuation Disputes

Real estate taxation has been contentious due to valuation disagreements. Disputes often arise when tax officers assign "market values" inconsistent with taxpayer-reported accounting values. Between 2016–2021, approximately 30% of real estate cases in tax courts related to valuation disagreements.

- 1) CPAs interviewed emphasized the lack of standardized valuation protocols.
- 2) Simulation of valuation disputes under the proposed model showed that introducing AI-assisted valuation benchmarks could have reduced disputes by 40%.

This case mirrors international recommendations on introducing uniform valuation standards (OECD, 2022).

7.2. Comparative Benchmarks

7.2.1. United Kingdom: Alternative Dispute Resolution (ADR)

The UK's HMRC institutionalized ADR as part of its governance reforms. ADR involves facilitated negotiations

with an independent mediator before litigation [35]. Empirical evidence shows:

- 1) 35% reduction in tax litigation backlogs.
- 2) Shortened resolution time from 18 months to 6 months.
- 3) Higher taxpayer satisfaction due to fair process perceptions.

If Egypt were to adopt ADR formally, combined with CPA participation, it could dramatically reduce the volume of tax court cases.

7.2.2. Canada: Digital Compliance Audits

Canada's CRA relies heavily on predictive analytics to flag high-risk taxpayers.

- 1) In 2020, CRA identified 22% of potential disputes before escalation.
- 2) E-audit tools provided taxpayers with early reconciliation opportunities.
- 3) Costs of dispute resolution were reduced by over 40% [20].

This case illustrates the value of integrating accounting data with AI risk scoring. Egypt's fragmented IT systems contrast sharply with Canada's centralized digital infrastructure.

7.2.3. Australia: Independent Pre-litigation Reviews

Australia requires independent officers to review disputes before litigation (ATO, 2023).

- 1) These reviews resulted in 40% fewer cases proceeding to court.
- 2) Taxpayers viewed the system as transparent and impartial, improving voluntary compliance.

Egypt could replicate this by establishing an independent mediation unit within the Ministry of Finance, supported by CPAs as technical experts.

7.2.4. OECD Recommendations on Tax Administration Reform

The OECD emphasizes preventive governance, digital transformation, and stakeholder trust as the three pillars of effective tax administration (OECD, 2022).

- 1) Preventive measures reduce disputes before escalation.
- 2) Digital tools enhance documentation and traceability.
- 3) Trust ensures voluntary compliance.

Benchmarking Egypt against these standards highlights the country's over-reliance on temporary laws instead of structural reforms.

Summary

This chapter demonstrates that Egypt's disputes are concentrated in construction, wholesale, and real estate sectors, with root causes in weak accounting systems, valuation disagreements, and absent mediation mechanisms. Comparative international experiences show that ADR (UK), digital audits (Canada), and independent reviews (Australia) can prevent disputes sustainably. Together with OECD guidelines, these cases provide strong evidence for the adoption of the pro-

posed smart accounting–legal reform model in Egypt.

8. Discussion and Model Application

8.1. Interpretation of Results

8.1.1. Alignment with Theory

The findings strongly align with the theoretical frameworks presented in Chapter 3. Accounting Information Quality Theory is validated by the strong correlation between weak documentation and dispute frequency (H1). Similarly, Agency Theory is reflected in the conflicting goals of taxpayers and the Tax Authority, exacerbated by asymmetrical information. The introduction of preventive governance aligns with OECD (2022) frameworks, proving that proactive, data-driven approaches are more effective than reactive legislation.

8.1.2. Empirical and Simulation Convergence

Survey and interview data revealed systemic weaknesses in Egypt's dispute management: poor documentation, lack of reconciliation, and fragmented IT infrastructure. Simulation modeling converged with these insights by demonstrating how AI-driven predictive systems could reduce disputes by 25–30%. This convergence strengthens confidence in the model's predictive validity (Arrieta et al., 2020; Epstein, 2006).

8.2. Application of the Simulation Model

8.2.1. How Policymakers, CPAs, and Tax Authorities Can Use It

The simulation model has direct applications:

- 1) Policymakers can use risk forecasts and scenario analyses to design targeted reforms.
- 2) Tax officers can identify high-risk taxpayers in advance and initiate pre-dispute mediation.
- 3) CPAs can use early warning indicators to guide clients toward compliance and prevent escalation.

Embedding the model in Egypt's Ministry of Finance would institutionalize preventive tax governance.

8.2.2. Integration with E-Filing, E-Audit, and Dispute Resolution

The model integrates with Egypt's ongoing digitalization agenda. By linking with e-filing systems, it ensures real-time access to accounting data. Coupled with e-audit tools, the model provides auditors with predictive analytics dashboards. Integration with dispute resolution units ensures that reconciliation is attempted before litigation. International examples (CRA, 2020; HMRC, 2021) demonstrate that such integration reduces both costs and delays.

8.3. Model Benefits

8.3.1. Prevention vs. Treatment

The proposed model shifts Egypt's dispute management from reactive "treatment" to preventive "vaccination." Rather than legislating temporary settlements every 3–4 years, the system proactively predicts disputes. This aligns with preventive governance theory and enhances efficiency (OECD, 2022).

8.3.2. Early Warning System

Simulation-generated risk maps serve as an early warning system, identifying vulnerable sectors such as construction and real estate. Policymakers can prioritize interventions, and CPAs can advise clients before conflicts escalate. This mirrors Canada's predictive compliance audits [20].

8.3.3. Resource Optimization for the Tax Authority

The Tax Authority spends considerable resources on litigation, with disputes averaging 14 months. By preventing escalation, the model reduces workload, reallocates staff to preventive audits, and enhances efficiency. Cost-benefit forecasts project 70% savings compared to traditional litigation (World Bank, 2021).

8.4. Contributions, Excellence, and Policy Innovation

- 1) Theoretical Contribution: The study integrates accounting information quality, agency theory, preventive governance, and simulation modeling into a unified framework for tax disputes—an innovation not addressed in existing literature (Christensen et al., 2014).
- 2) Empirical Contribution: Through surveys, interviews, and simulation validation, the research provides the first comprehensive empirical evidence of the accounting roots of disputes in Egypt.
- 3) Comparative Contribution: By benchmarking Egypt against UK ADR, Canada's digital audits, and Australia's pre-litigation reviews, the study introduces internationally recognized preventive practices to the Egyptian context.
- 4) Policy Innovation: The research advances a smart accounting–legal reform model that integrates AI, CPAs, and preventive mediation into Egypt's tax system, moving beyond temporary laws.

This positions the model as a cornerstone for Egypt's Vision 2030 institutional reforms, contributing to transparency, trust, and fiscal stability.

9. Policy and Practical Recommendations

9.1. Establish a Digital Pre-dispute Mediation Platform

One of the strongest findings is that early reconciliation

prevents escalation. Egypt should institutionalize a Digital Pre-Dispute Mediation Platform:

- 1) Structure: Managed jointly by the Tax Authority and CPAs, supported by Ministry of Finance IT infrastructure.
- 2) Functionality: Automated case flagging via simulation outputs; taxpayers and CPAs receive alerts when discrepancies emerge.
- 3) Legal Status: Settlements reached through mediation should be legally binding and enforceable, similar to the UK's ADR model [35].
- 4) Impact: Simulation shows that embedding such a platform could reduce dispute escalation by 30–40% annually.

This recommendation aligns with preventive governance theory and OECD (2022) recommendations for digital-first tax administration.

9.2. Mandate Accounting Documentation Standards for SMEs

Survey and interviews confirmed that SMEs are at the core of dispute recurrence due to poor bookkeeping. Egypt should mandate minimum digital documentation standards:

- 1) SMEs exceeding annual revenues of 2 million EGP must maintain digital accounting ledgers.
- 2) Mandatory engagement of licensed CPAs for review of submissions.
- 3) Training programs for SME accountants on Egyptian Accounting Standards (EAS) and IFRS (Christensen et al., 2014).

This aligns with Canada's experience where digital bookkeeping significantly reduced SME disputes [20]. Such a reform embeds accounting quality into the compliance chain, thereby addressing root causes of disputes.

9.3. Train CPAs and Tax Officers on Predictive Dispute Management

Both CPAs and tax officers emphasized skills gaps in digital tools and predictive analytics. To ensure sustainability, Egypt should establish continuous training modules:

- 1) CPAs: courses in digital bookkeeping, predictive auditing, and dispute mediation.
- 2) Tax officers: modules on data analytics, AI-based risk scoring, and communication strategies.
- 3) Joint workshops: encourage taxpayer–authority trust by simulating dispute resolution cases collaboratively.

International evidence shows training investments improve compliance efficiency [6]. Such training operationalizes the behavioral taxpayer compliance model, enhancing fairness and trust (Kirchler, 2007).

9.4. Pilot the Simulation Model in High-dispute Sectors

Given resource constraints, Egypt should start with a sec-

tor-focused pilot program:

- 1) Construction Sector: recurrent disputes over cost recognition and subcontracting expenses.
- 2) Wholesale/Retail Trade: frequent VAT mismatches due to manual inventory reporting.
- 3) Real Estate: chronic valuation disagreements.

Each pilot would integrate:

- 1) The simulation model as a predictive tool.
- 2) Mandatory CPA validation of records.
- 3) Pre-dispute mediation sessions.

Lessons from pilots can guide national rollout, similar to Australia's pre-litigation reviews that began in high-risk sectors before national adoption (ATO, 2023).

9.5. Broader Policy and Legislative Recommendations

In addition to specific interventions, Egypt should pursue broader structural reforms:

- 1) Legislative embedding of preventive governance: Amend the tax law to require pre-dispute mediation and CPA involvement.
- 2) Digital transformation roadmap: Develop a five-year plan for full e-filing, e-audit, and AI-enabled dispute forecasting.
- 3) Institutional reform: Establish an Independent Mediation Unit under the Ministry of Finance, supported by CPAs and IT specialists.
- 4) International benchmarking: Engage with OECD and IMF capacity-building programs to align reforms with global best practices.

Summary

This chapter presented actionable recommendations derived from the empirical findings and comparative benchmarks. By establishing a digital mediation platform, mandating accounting standards for SMEs, training CPAs and tax officers, and piloting the simulation model in high-risk sectors, Egypt can transition from reactive dispute settlement to preventive governance. Legislative, digital, and institutional reforms ensure long-term sustainability and alignment with Vision 2030.

10. Conclusion and Future Directions

10.1. Summary of Core Findings

This research set out to address one of Egypt's most persistent fiscal challenges: recurrent tax disputes between taxpayers, CPAs, and the Tax Authority. Despite repeated legislative efforts—including Law 79/2016, Law 160/2024, and Law 5/2025—Egypt's framework has remained reactive, relying on temporary settlement laws that fail to address root causes.

The study's empirical results demonstrated that the root of

disputes lies in accounting quality and digital traceability rather than solely in legal frameworks. Survey results showed that 76% of CPAs attributed disputes to missing or incomplete documentation, while interviews revealed that tax officers relied on estimation due to weak records. Hypothesis testing confirmed:

- 1) Poor accounting documentation significantly increases dispute frequency (H1).
- 2) Digital transformation shortens dispute duration by up to 38% (H2).
- 3) Simulation-based predictive systems can prevent up to 30% of disputes (H3).

Comparative case studies from Egypt's construction, wholesale, and real estate sectors illustrated recurring failures in reconciliation and documentation. In contrast, international benchmarks (UK ADR, Canada digital audits, Australia independent reviews) highlighted sustainable preventive models.

The proposed smart accounting-legal reform model integrates accounting transparency, simulation-based decision support, and preventive governance into a unified system for proactive tax dispute resolution.

10.2. Reinforce the Failure of Temporary Legal Fixes

A key finding is that Egypt's reliance on temporary, repetitive laws has entrenched inefficiency. Laws such as 79/2016 and 160/2024 merely postponed disputes, without institutionalizing preventive mechanisms. The interviews revealed frustration among both taxpayers and tax officers, who noted that such laws "clear the backlog temporarily" but do not improve systemic fairness.

From a governance perspective, this confirms the limits of reactive legislation. While temporary settlement laws may reduce case backlogs in the short term, they perpetuate distrust, as taxpayers expect future amnesties and delay compliance. OECD (2022) guidelines stress that sustainability requires embedding digital transparency and preventive mediation.

This reinforces the need for Egypt to move from reactive, law-based fixes to structural, accounting-based reforms supported by digitalization.

10.3. Validate the Intelligent Model as a Path Forward

The intelligent simulation model proposed in this study has been validated both empirically and through simulation outputs:

- 1) Predictive accuracy: The model correctly forecasted dispute hotspots in construction and real estate, aligning with historical data.
- 2) Efficiency gains: Scenario analyses showed 70% reductions in administrative costs when mediation re-

placed litigation.

- 3) Stakeholder trust: CPAs and taxpayers expressed stronger confidence in a system that embeds accounting transparency and mediation, rather than adversarial litigation.

By integrating multi-agent simulation (taxpayer, CPA, tax authority) with accounting data quality and AI-driven analytics, the model represents a holistic, preventive governance tool. Unlike temporary legal fixes, it offers sustainable reform by diagnosing and resolving disputes before escalation.

10.4. Future Expansion to Regional Tax Dispute Prediction Platforms

While the research focused on Egypt, its implications extend across the Middle East and North Africa (MENA) region, where similar dispute patterns exist: reliance on manual accounting, weak mediation mechanisms, and dependence on temporary amnesty laws (World Bank, 2021).

Future research should expand the model into:

- 1) Regional benchmarking platforms: Developing a cross-country simulation framework comparing Egypt, Jordan, Morocco, and Tunisia.
- 2) Integration with blockchain accounting: Using immutable ledgers to enhance documentation reliability [6].
- 3) AI explainability (XAI): Ensuring that predictive models remain transparent to policymakers and taxpayers [7].
- 4) Behavioral compliance testing: Expanding the model to capture psychological and cultural factors influencing taxpayer trust (Kirchler, 2007).

By embedding the model into regional fiscal policy platforms, Egypt could lead tax governance reform in MENA, aligning with international best practices and fostering investor confidence.

Summary

In conclusion, this study demonstrates that temporary legal solutions have failed to resolve Egypt's tax disputes. The empirical and comparative evidence validates the intelligent accounting-based simulation model as a sustainable alternative. By embedding accounting transparency, preventive governance, and AI-enhanced simulations into tax administration, Egypt can transform its system from reactive litigation to proactive prevention.

Future expansions could extend the model into regional platforms, supporting Egypt's role as a leader in fiscal reform under Vision 2030.

Abbreviations

ADR	Alternative Dispute Resolution
AI	Artificial Intelligence
CPA	Certified Public Accountant
CRA	Canada Revenue Agency
DSS	Decision Support System

EAS	Egyptian Accounting Standards
HMRC	Her Majesty's Revenue & Customs (UK)
OECD	Organisation for Economic Co-operation and Development
SEM	Structural Equation Modeling
XAI	Explainable Artificial Intelligence

Author Contributions

Amin ElSayed Ahmed Lotfy is the sole author. The author read and approved the final manuscript.

Conflicts of Interest

The author declares no conflicts of interest.

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