1. Crypto assets' challenges to tax transparency
   - Pseudonymity and anonymity
   - Disintermediation and decentralization
   - Lack of a clear situs

2. Are the current international standards of exchange of information in tax matters adequate to tackle crypto assets' challenges to tax transparency?
   - Question I: What information on crypto assets is relevant for tax purposes?
   - Question II: Crypto assets and EOIR? Crypto assets and AEOI?
   - Question III: Are the present data protection safeguards in EOI procedures adequate in the context of crypto assets?

3. Methodology
   - Doctrinal analysis
   - Comparative analysis (CH - BE - USA)
   - Development of normative solutions

4. Preliminary findings
   - EOIR
     - Individual and group requests on accounts with centralized crypto asset service providers resemble traditional EOIR cases
     - Both individual and collective requests based on blockchain addresses possible under current EOIR Standard
     - Type of blockchain (public-private / permissionless-permissioned) important for determination of information holder
   - AEOI
     - CARF continues to rely on third-party reporting: situations involving P2P transactions or DEX generally not within scope
     - Not all reporting provided by CARF qualifies as “foreseeably relevant information” (transfers to self-hosted wallets)
     - US implementation of CARF likely through broker reporting

5. Remaining questions
   - Can/should tax administration scan blockchains to trace resident crypto asset users?
   - Once a blockchain address is connected to a particular taxpayer, the tax administration has insight in all transactions ever conducted by that taxpayer: compatibility with data protection safeguards?
   - Taxing anonymity as a solution?

thomas.dilen@ius.uzh.ch - Tel. +4178 406 24 63