



## RESEARCH ARTICLE

# Legal Framework of Tax Debt Collection and Tax Authorities' Right of Preference in Bankruptcy

Herianto<sup>1</sup>, Retno Mawarini Sukmariningsih<sup>2</sup>, Sri Mulyani<sup>3</sup>, Afif Noor<sup>4\*</sup><sup>1</sup> Doctoral Program Universitas 17 Agustus 1945, Semarang<sup>2</sup> Faculty of Law Universitas 17 Agustus 1945, Semarang<sup>3</sup> Faculty of Law Universitas 17 Agustus 1945, Semarang<sup>4</sup> Universitas Islam Negeri Walisongo, Semarang**ARTICLE INFO****ABSTRACT**

Received: Jul 10, 2024

Accepted: Sep 8, 2024

**Keywords**

Debt Collection

Preference Rights

Tax Authority

Bankruptcy

This study examines the lived experiences and motivations of former Abu Sayyaf Group (ASG) members in the Southern Philippines, highlighting the complexities of violent extremism and the importance of effective reintegration strategies. Utilizing a transcendental-phenomenological methodology, this qualitative study collected in-depth interviews from ten ASG returnees in Basilan Province, uncovering the personal and social factors that influenced their decisions to join and leave the group. The findings illuminate themes such as hardship, regret, and the search for belonging that characterized their lives within the extremist group. Many former ASG members viewed their association as a means of refuge from societal stigmas and personal grievances, driven by a confluence of personal, ideological, and social factors. The influence of familial and peer relationships emerged as crucial in both recruitment into the ASG and the process of reintegration, underscoring the significant role of social networks in shaping decisions related to extremism and rehabilitation. Overall, the study highlights the necessity of addressing underlying socioeconomic and psychological factors to support effective deradicalization and reintegration strategies for former extremists. Tax

**\*Corresponding Author:**

Herianto.atmo@gmail.com

**INTRODUCTION**

Emphasizing the importance of tax debt collection, a vital process in optimizing state revenue from taxes, is crucial (Ogonda et al., 2022). This process ensures that taxpayers fulfill their obligations by paying off outstanding tax debts (Fogg & Jozipovic, 2015). Tax debt collection involves a series of procedures that must be carried out by the State Tax Bailiff (JSPN) appointed by the Directorate General of Taxes. However, the implementation of tax debt collection is not optimal. Based on the Directorate General of Taxes' Annual Performance Report for 2019-2022, the revenue contribution from tax debt disbursement to total tax revenue is still relatively small. In 2019, tax debt disbursement generated IDR 16.64 trillion of the total tax revenue of IDR 1,332.66 trillion. This figure decreased slightly in 2020 to IDR 16.09 trillion from IDR 1,072.11 trillion but increased sharply in 2021 to IDR 19.6 trillion from IDR 1,278.65 trillion. The year 2022 again showed a decline, with tax debt disbursement amounting to IDR 14.07 trillion from total tax revenue of IDR 1,716.76 trillion (Direktorat Jenderal Pajak, 2022; Jassim et al., 2024).

Underlining the role of the Self-Assessment System in tax collection is crucial (Olurankinse & Oladeji, 2018). This system allows taxpayers to calculate, report, and pay the tax due themselves, based on their calculations, without an initial audit from the tax authorities. It significantly impacts state revenue as tax collection becomes less than optimal. On the one hand, this system gives excellent confidence to taxpayers to honestly report their income and fulfill their tax obligations by applicable regulations (Putri Pramudya, 2022). However, this system also opens loopholes for tax manipulation and non-

compliance (Diamastuti, 2018). To maximize the collection of tax debts, the government has issued Law No. 19 of 1997, which was last amended by Law No. 19 of 2000 on Tax Collection by Force. This law is the basis for collecting tax debts, including tax debts that must be paid by corporate taxpayers undergoing bankruptcy proceedings and postponement of debt payments.

For corporate taxpayers in the process of bankruptcy and postponement of debt payments, the company's responsibility is transferred to the Curator appointed by the Supervisory Judge, whose process is carried out by the applicable bankruptcy stages. For this reason, when the Curator submits a bankruptcy notification, it is usually accompanied by a request for a list of taxpayer debts. Based on this request, the tax bailiff meticulously confirms the tax debt in the Information System of the Directorate General of Taxes (SIDJP) or the tax authority to ensure the accuracy of the determination of the tax debt owed by the bankrupt taxpayer. The list of confirmed tax debts is then submitted to the Curator for use in the bankruptcy settlement process, providing the audience with a sense of security about the precision of the information.

To ensure that the tax debts owed by the bankrupt corporate taxpayer are paid, the curator must ensure the adequacy of the bankruptcy assets, which will be used as money to pay all debts of the bankrupt debtor. Then the curator determines the level of creditors whose debts can be paid with the to the Creditors List Plan. This plan, a transparent and fair system, determines which creditors will receive payment from the bankruptcy assets. In carrying out his duties, the curator must establish a policy that tax debts are paid first before other debts, except in certain cases regulated by law. This underscores the importance of the audience's role in the process. However, to ensure that the state's right to obtain payment of tax debts is not neglected, regulations must regulate in detail the procedures for tax collection in conditions of bankruptcy or postponement of debt payments.

Regulations should set out the role of tax authorities in the insolvency process, including the right to attend creditors' meetings, submit proofs of debt, and oversee the liquidation process (Eidenmüller, 2017; Othman et al., 2024). Equally important, regulations should ensure that the court has the authority to decide on the status of outstanding tax debts and provide clear, unambiguous instructions on how such debts should be settled. If the corporate taxpayer is postponing debt payment obligations, the regulations must contain conditions that the taxpayer must meet to obtain a postponement of tax payments. These conditions may include evidence that the taxpayer has a realistic financial restructuring plan and assurances that the taxpayer will repay the debt after the postponement period ends. Regulations should also set out the consequences if the taxpayer fails to settle the debt after obtaining a postponement, including the possibility of lifting the postponement status and resuming the normal collection process.

The institutional regulation of tax debt collection in bankruptcy and postponement of debt payment obligations cases is essential and worthy of study because it covers a crucial aspect of the legal and taxation system. It is not only important from a legal and financial perspective, but also relevant to support better economic governance. The study of this topic will make a significant contribution to the academic and practical understanding of law enforcement efforts. It will create a more effective, fair, and sustainable system for handling tax debt issues in bankruptcy cases, which protects the rights of the state and provides legal certainty for all parties involved, thereby instilling confidence in the system.

For this reason, the study of regulations related to tax debt collection in bankruptcy cases and postponement of debt payment obligations is not just important, it is vital (Nurohim & Hanafi, 2022). It deserves to be the object of research with the aim of exploring and analyzing institutional regulations in tax debt collection, especially in the context of bankruptcy and postponement of debt payment obligations in Indonesia. This research has the potential to significantly impact the current regulations and make recommendations for future improvements. The main focus is to ensure that these institutional regulations are able to protect the rights of the state as a tax recipient and protect the interests of the parties involved.

---

bankruptcy assets and distributes them according

## RESEARCH METHOD

This research adopts a normative approach with descriptive analysis to explore and understand the legal provisions of tax debt collection and the tax authority's preference rights in bankruptcy. The primary data sources come from secondary legal materials, which include primary legal materials such as relevant laws, government regulations, and tax regulations, as well as secondary legal materials such as research journals, scientific articles, and books related to the research topic (Noor, 2023). The data obtained is then analyzed using descriptive techniques, which include describing and explaining the findings based on the data collected and preparing policy recommendations to improve and enhance the legal framework for tax debt collection in the bankruptcy process.

## DISCUSSION

### Legal framework for tax debt collection amidst bankruptcy proceedings

Bankruptcy, a situation where a debtor is unable to meet its obligations to creditors, triggers a complex process (Babatunde Onakoya & Olotu, 2017; Sukardi, 2021). The state, a key player in this process, particularly in the context of tax debt collection, must act swiftly. The right to collect taxes on these tax debts will expire in less than two years, necessitating the state's prompt action. Through the Directorate General of Taxes (DGT) as the tax authority, the state has the crucial right to submit claims for unpaid tax debts by debtors declared bankrupt.

There are two main theories that define tax debt: the material theory and the formal theory (Darmayasa et al., 2018). The material theory argues that tax debt automatically arises when a specific event or circumstance stipulated in the tax law (*tatbestand*) occurs, without the need for direct intervention from the tax authority. In this view, the tax assessment letter is merely declarative, serving to inform and consolidate the amount of tax owed based on the law. On the other hand, the formal theory posits that tax debt only comes into existence when the tax authority officially issues a tax assessment letter. In this theory, the tax assessment letter is constitutive, meaning that it creates and officially determines the tax debt the Taxpayer must pay.

The primary mechanism used to settle tax debts is direct payment (Sahm, 2019). However, laws and government policies also offer a range of alternatives that can be applied in certain situations. These alternatives, including compensation, expiration, tax waivers, and collection delays, provide a flexible framework for settling tax debts, adapting to the Taxpayer's condition and ensuring a fair process. If the Taxpayer has yet to pay the tax debt, the tax authority can carry out collection. This process, based on the provisions of Article 1 point 9 of Law No. 19 of 2000 concerning Amendments to Law No. 19 of 1997 concerning Tax Collection by Force, involves a series of actions. These actions, including reprimanding or warning, immediate and simultaneous collection, notifying a Forced Letter, proposing prevention, confiscation, hostage-taking, and selling confiscated goods, ensure a thorough and fair tax collection process.

Issuing a Writ of Compulsion is essential in the tax collection system to ensure the state can collect taxes effectively (Putra & Muslim, 2022). It acts as a robust legal instrument to enforce tax obligations and provide a deterrent effect to non-compliant taxpayers (Dalimunthe et al., 2022). The issuance process involves several steps, from issuing a Writ of Compulsion by the Head of the Tax Office after 21 days from the Letter of Reprimand to its notification by the Tax Bailiff. The notification is made through local government officials or mass media if it cannot be delivered directly. This process follows the rule of law to ensure taxpayers fulfill their obligations (Chumaidi et al., 2023).

In order to create justice, legal certainty, and benefits in the implementation of tax collection, the government, through the Minister of Finance, issued the latest regulations regarding tax collection procedures in Indonesia as stipulated in Minister of Finance Regulation (PMK) Number 61 of 2023, which replaces Minister of Finance Regulation Number 189/PMK.03/2020, which needs to be improved in line with the enactment of Law Number 7 of 2021 concerning Harmonization of Tax Regulations. With the issuance of PMK Number 61 of 2023, the government also revoked several old regulations related to tax collection procedures, namely Minister of Finance Decree Number 85/KMK.03/2002, PMK Number 23/PMK.03/2006, and PMK Number 189/PMK.03/2020.

One of the essential provisions in PMK Number 61 Year 2023 is tax collection assistance with partner countries or jurisdictions, which is regulated in Chapter VIII. This provision is a follow-up to Article 20A of the Law on General Provisions and Tax Procedures and Article 48 of Government Regulation Number 55 Year 2022. The procedures for collection assistance with partner countries are further explained in several PMK Number 61 Year 2023 articles, which provide more detailed guidelines regarding cross-border collection procedures. In addition to changes related to collection assistance, PMK Number 61 Year 2023 also introduces several new provisions not regulated in the previous regulation. Some of the significant changes include the additional authority for the Minister of Finance to appoint officials for tax collection and the addition of carbon tax as one of the types of taxes that can be subject to collection actions.

Other changes also include provisions regarding the confiscation of movable and immovable goods and more specific management of confiscated goods. The new regulation also clarifies provisions that were previously regulated. For example, the collection expiration period, which was previously not specified, is now clarified to be "expired in less than 2 (two) years." Provisions related to employees who are entitled to receive notifications of forced letters for Corporate Taxpayers have also been clarified, and there are new rules regarding alternative ways of notifying forced letters through the official website of the Directorate General of Taxes.

Overall, PMK Number 61 Year 2023 aims to simplify and strengthen tax collection procedures in Indonesia. This simplification includes provisions related to the revocation of confiscation, blocking, and consideration of prevention and release of taxpayers who are held hostage. In addition, this regulation also clarifies procedures in cross-border collection with partner countries, as well as the addition of carbon tax as a collectible tax object. With the issuance of this PMK, the tax collection process is expected to be more effective and efficient and provide legal certainty for taxpayers and tax authorities.

Technically, there are two collection categories in tax collection: passive and active (Dauchy et al., 2021). Passive collection involves issuing collection documents such as Tax Billing Letters, Tax Assessment Letters of Underpayment, and Warning Letters without direct action against the taxpayer (Subagyo & Saleh, 2023). This collection is carried out when the taxpayer still needs to fulfill its obligations despite being provided with official letters confirming the amount of tax to be paid. Active tax collection begins when a Letter of Reprimand is not heeded, leading to the issuance of a Letter of Compulsion. This step is followed by concrete actions such as confiscation and account blocking. The purpose of active collection is to force taxpayers to pay off their debts with direct action, including auctioning seized goods if the tax debt remains unpaid. In addition to the active collection, measures such as prevention and hostage-taking can be taken (Adiyanta, 2022). Precaution prohibits taxpayers from leaving the country before paying off their tax debts, while hostage-taking involves the restraint of liberty to force repayment of debts. These actions demonstrate the government's commitment to enforce tax obligations strictly.

The government's commitment to enforcing tax obligations is not just a policy, but a responsibility that it takes seriously (Chumaidi & Noor, 2022). This commitment is upheld even when a taxpayer is in a state of bankruptcy or suspension of debt payment obligations. The collection of tax debts on bankrupt taxpayers has a strong legal basis and is guaranteed by legislation. Law No. 37/2004 on Bankruptcy and Suspension of Debt Payment Obligations (Bankruptcy Law) is the main legal basis that regulates bankruptcy procedures and mechanisms in Indonesia. In the bankruptcy law, the Directorate General of Taxes (DGT) as the tax authority has the significant position as a creditor entitled to collect tax debts. This law expressly regulates the state's rights in the bankruptcy process, ensuring that the government fulfills its responsibilities in the tax collection process.

To collect tax debts in the bankruptcy process, the DGT, as the tax authority, must follow the procedures regulated by the Bankruptcy Law (Herianto, 2024). The DGT submits a tax debt claim to the commercial court handling the debtor's bankruptcy, accompanied by supporting documents proving the amount of tax debt.

The court-appointed administrator or curator then meticulously verifies this claim to ensure its validity. If valid, DGT will be included in the list of creditors entitled to repayment from the bankruptcy assets. The administrator or curator reports the list of creditors and the amount of each claim, including the DGT, to the court, which then decides on the distribution of bankruptcy assets based on priorities regulated by law.

### **Preference rights of tax debt in the bankruptcy**

Bankruptcy is when a debtor is declared unable to pay its overdue debts. In this process, the debtor's assets will be managed by a curator to fulfill obligations to creditors (Sutrisno, 2020). However, not all creditors have the same position regarding rights to the debtor's assets. Some types of debts have higher rights, known as preferential rights. One debt that has preferential rights is tax debt. This right is owned by the Directorate General of Taxes (DGT), the tax authority acting as the state's representative in managing unpaid taxes by debtors who are in bankruptcy. In bankruptcy law, the right of precedence is a right granted by law to certain creditors to obtain priority in payment from the sale of the bankrupt debtor's assets (Winanto et al., 2019). This right aims to protect the state's interests and creditors considered to have higher interests than other creditors. Tax debt is one type with the right of precedence, so the DGT has the priority of getting payment for tax debts that the debtor has not settled.

The position of the Directorate General of Taxes, as a representative of the state in the Bankruptcy Process, has the right to submit claims for tax debts that the debtor has not settled. According to Article 41 of the Bankruptcy Law, creditors, including the DGT, have the right to submit claims to the commercial court to obtain repayment from the bankruptcy estate. This tax debt claim must be submitted within the period specified by law and will be examined by the administrator or curator appointed by the court. In addition, Article 95 paragraph (1) of Law Number 28 Year 2007 on General Provisions and Tax Procedures (KUP Law) states that the state has the right of preference in collecting tax debts. This right of preference means that tax debts filed by the DGT shall take precedence in repayment over other debts, except for court costs arising from the bankruptcy process and the bankruptcy costs. It confirms that the state has the top priority in receiving tax debt repayment from a bankrupt debtor and has the right of preference.

This preference right owned by the state in the collection of tax debts makes the state a creditor who takes precedence in receiving debt repayment from the bankruptcy estate. Article 1139 and Article 1149 of the Civil Code (KUHPer) also provide an additional legal basis for the state's right of preference in tax debts. Article 1139 of the Civil Code states that some debts have preference rights, including taxes owed to the state. Meanwhile, Article 1149 of KUHPer confirms that the state's preference rights on tax debts shall take precedence over the rights of other creditors, except for court costs and bankruptcy costs. With this preference suitable, DGT, as the tax authority, has solid legal power to demand the repayment of tax debts from bankrupt debtors.

Although the state has the right of preference in collecting tax debts, several challenges are faced in its implementation. One of the main challenges is the limited bankruptcy assets the debtor owns (Tryandari, 2021). In many bankruptcy cases, the assets owned by the debtor are insufficient to pay off all debts filed by creditors, including tax debts. It may result in the state not obtaining the maximum settlement of the proposed tax debt. In addition, verifying and validating tax debt claims by the administrator or curator can be an obstacle (Wibowo et al., 2020). The administrator or curator must carefully examine each claim submitted, including tax debt claims. Suppose there is a difference of opinion between the DGT and the administrator or curator regarding the amount of tax debt to be paid. In that case, this can prolong the process of claim settlement.

To ensure the right of precedence over tax debts is protected in the bankruptcy process, the Directorate General of Taxes (DGT), as the tax authority, must follow specific procedures in submitting tax debt claims to the curator. This procedure includes several stages, namely:

1. The DGT, as the tax authority, plays a crucial role in the determination of the amount of tax debt. Their meticulous work before filing a claim, accurately determining the amount of tax debt owed by the debtor, is a cornerstone of the process. This determination is made through the tax collection process, which involves the issuance of tax assessment letters and tax bills. The DGT must also ensure that the tax debt is due and unpaid by the debtor.

2. Submission of Claim to the Curator Once the amount of tax debt has been determined, the DGT must submit the tax debt claim to the curator responsible for managing the debtor's assets. This claim must be submitted in writing and accompanied by supporting evidence, such as tax assessment letters and bills. The curator will then record the claim in the debtor's debt register.
3. The verification and validation of claims is a meticulous process designed to ensure the fairness and accuracy of the proceedings. Upon receiving the claim from the DGT, the curator undertakes a thorough examination. This involves checking the documents submitted by the DGT and inspecting the debtor's assets that can be used to pay the tax debt. If the claim is found to be valid, the curator will include the tax debt claim in the list of debts recognized by the court.

Payment of Tax Debts After the debtor's list of debts is approved by the court, the curator will start making payments to the creditors. Since tax debts have precedence rights, the DGT will receive payment from selling the debtor's assets before other creditors. These payments must be made by the provisions stipulated in the Bankruptcy and Postponement of Debt Payment Obligations Law (UUK-PKPU) and other relevant laws and regulations. Although the right to precede tax debts has been regulated in UUK-PKPU, its implementation only sometimes runs smoothly. The tax authority, DGT, plays a crucial role in this process, despite several challenges it often faces in submitting tax debt claims in the bankruptcy process. These challenges are:

- a. One of the biggest challenges the DGT faces is the limited information on the debtor's assets that can be used to pay tax debts. In some cases, bankrupt debtors may not report all of their assets, such as offshore accounts or undeclared properties, making it difficult for DGT to identify assets that can be used to pay tax debts.
- b. Complicated Verification Process: The verification process of tax debt claims by the receivership can also be challenging, especially if there are different interpretations of the amount of tax debt to be paid. For instance, the debtor may argue that certain expenses should be deducted from the total tax debt, leading to a discrepancy in the amount to be paid. This difference can occur if the debtor files an objection or appeal against the tax assessment letter issued by the DGT. In such a situation, the verification process can take a long time and delay the payment of tax debts.
- c. Competition with Other Creditors: Although tax debts have prior rights, DGT still has to compete with other creditors to obtain payment from the sale of the debtor's assets. Creditors who have collateral, for example, may claim that certain assets should be used to pay their debts first. This situation may lead to a conflict that the court must resolve.
- d. Limited Human Resources DGT also needs help regarding human resources involved in the tax debt collection process in bankruptcy. Managing tax debt claims in bankruptcy proceedings requires specialized expertise in law and finance, which DGT employees only sometimes possess. This limitation may affect DGT's effectiveness in filing and defending tax debt claims.

In order to improve the effectiveness of the Right to Preempt Tax Debt, DGT, as the tax authority, needs to take several strategic steps. These steps, such as improving human resources, cooperating with other agencies, preparing standard operating procedures, and utilizing information technology, hold the potential to significantly enhance our effectiveness. Improvement of Human Resources Capability DGT needs to improve the capability of human resources involved in the bankruptcy tax debt collection process. It can be done through training and education focusing on the legal and financial aspects of bankruptcy. By having competent human resources, DGT will be better able to file and defend tax debt claims in bankruptcy.

DGT, as the tax authority, needs to strengthen cooperation with related parties, such as commercial courts, receivers, and financial institutions. This collaboration is not just important, it's crucial to ensure the smooth collection of tax debts and protect the DGT's prior rights. In addition, DGT should also develop comprehensive guidelines and standard operating procedures (SOPs) regarding tax debt collection in bankruptcy, covering all stages of the process, from determining the amount of debt to submitting claims to the curator. Clear guidelines and SOPs will help DGT to be better prepared to face various challenges in the bankruptcy process.

In addition, the implementation of SOP must be supported by the utilization of information technology. DGT needs to develop an information system integrated with the commercial court and the curator, making monitoring the bankruptcy process in real time easier. With a sound system, DGT will be able to respond to the situation quickly and improve the efficiency of managing tax debt claims. With these steps, it is expected that DGT can be more effective in filing tax debt claims and ensuring that the prior rights of tax debts are protected in every bankruptcy process.

## CONCLUSION

Tax debt collection in Indonesia is regulated by Law No. 19/2000 on Tax Collection by Writ of Compulsion and Law No. 37/2004 on Bankruptcy and Suspension of Debt Payment Obligations, which provide the legal basis for tax authorities to conduct collection. In the context of bankruptcy, tax debts are considered receivables with preference rights, so the state as a creditor has the right of precedence over the debtor's goods undergoing bankruptcy. Tax collection can be done through various means, including confiscating goods owned by taxpayers who do not fulfill their tax obligations. Tax authorities have the right to take legal action to ensure the payment of tax debts, which protects the state's interests and creates justice for compliant taxpayers. This right of preference is stipulated in legislation, giving tax authorities a privileged position in the order of debt repayment during insolvency proceedings. As such, tax debts must be paid before other debts. This legal framework establishes a precise mechanism to enforce tax obligations and protect the state's fiscal interests while considering the rights and interests of related parties in bankruptcy.

## REFERENCES

- Adiyanta, F. C. S. (2022). Imprisonment for Civil Debt (Gijzeling) in Indonesian Praxis Tax Law Enforcement. *International Journal of Social Science And Human Research*, 05(11), 4994–5001. <https://doi.org/10.47191/ijsshr/v5-i11-23>
- Babatunde Onakoya, A., & Olotu, A. E. (2017). Bankruptcy and Insolvency: An Exploration of Relevant Theories. *International Journal of Economics and Financial Issues*, 7(3), 706–712. <http://www.econjournals.com>
- Chumaidi, I., & Noor, A. (2022). Regulation of Income Tax in Law Number 7 of 2021 in An Effort to Create Justice and Legal Certainty. *Legal Brief*, 11(4), 2558–2564. <https://doi.org/10.35335/legal.xx.xx>
- Chumaidi, I., Noor, A., Tedjosaputro, L., Masriani, Y. T., & ... (2023). Transfer of Absentee Land to Maximize the Benefits of Agricultural Land in Toroh Grobogan, Central Java, Indonesia: A Legal Perspective. *Resmilitaris*, 13(5). <https://resmilitaris.net/menu-script/index.php/resmilitaris/article/view/2033%0Ahttps://resmilitaris.net/menu-script/index.php/resmilitaris/article/download/2033/1697>
- Dalimunthe, A. F., Ginting, B., Sunarmi, & Barus, U. M. (2022). Optimalisasi Penerapan Penyanderaan (Gijzeling) sebagai Upaya Penegakan Hukum (Law Enforcement) dalam Penerimaan Pajak (Studi Kasus Pelaksanaan Penyanderaan Di Kantor Wilayah Direktorat Jenderal Pajak Sumatera Utara I). *Jurnal Ilmiah Penegakan Hukum*, 9(2), 207–218. <https://doi.org/10.31289/jiph.v9i2.8295>
- Darmayasa, I. N., Sudarma, I. M., Achsin, H. M., & Mulawarman, A. D. (2018). Constructed interpretation of tax compliance through the historicity, rationality, and actuality of pancasila (cases in Indonesia). *International Journal of Trade and Global Markets*, 11(1–2), 67–76. <https://doi.org/10.1504/IJTM.2018.092481>
- Dauchy, E., Navarro-Sanchez, F., & Seegert, N. (2021). Taxation and inequality: Active and passive channels. *Review of Economic Dynamics*, 42, 156–177. <https://doi.org/10.1016/j.red.2020.10.004>

- Diamastuti, E. (2018). Ke (Tidak) Patuhan Wajib Pajak: Potret Self Assessment System. *EKUITAS (Jurnal Ekonomi Dan Keuangan)*, 20(3), 280–304. <https://doi.org/10.24034/j25485024.y2016.v20.i3.52>
- Direktorat Jenderal Pajak. (2022). *Laporan Kinerja Tahunan Direktorat Jenderal Pajak tahun 2019 sampai dengan 2022*.
- Eidenmüller, H. (2017). Contracting for a European Insolvency Regime. *European Business Organization Law Review*, 18(2), 273–304. <https://doi.org/10.1007/s40804-017-0067-1>
- Fogg, K., & Jozipovic, S. (2015). How can tax collection be structured to observe and preserve taxpayer rights: A discussion of practices and possibilities. *Tax Law.*, 69(3), 513.
- Herianto, H. (2024). Institutional Effectiveness of Tax Debt Collection in Increasing State Revenue. *Interdisciplinary Journal and Hummanity (INJURITY)*, 3(6), 327–334. <https://doi.org/10.58631/injury.v3i6.202>
- Noor, A. (2023). Socio-Legal Research: Integration of Normative and Empirical Juridical Research in Legal Research. *Jurnal Ilmiah Dunia Hukum*, 7(2), 94–112.
- Nurohim, M., & Hanafi, Y. (2022). Application For Bankruptcy By Creditors Perspective Of Law Number 37 Of 2004 Concerning Bankruptcy And Suspension Of Debt Payment Obligations. *Legal Brief*, 11(2), 1412–1426. [www.legal.isha.or.id/index.php/legal](http://www.legal.isha.or.id/index.php/legal)
- Ogonda, Gift Orokwele, Okiakpe, Ebikefe Kenneth, Zukbee, J. D. (2022). Tax Collection Procedure and Tax Revenue in Rivers State: An Empirical Evidence From Rivers State Board of Internal Revenue Service. *Book Of Proceedings of the 3rd Annual International Academic Conference, December*.
- Olurankinse, F. &, & Oladeji, O. E. (2018). Self-assessment, electronic-taxation payment system and revenue generation in Nigeria. *Accounting & Taxation Review*, 2(1), 39–55.
- Putra, F. A., & Muslim, A. I. (2022). Pengaruh Tindakan Penagihan Pajak dengan Surat Teguran dan Surat Paksa Terhadap Pencairan Tunggalan Pajak. *Review of Applied Accounting Research (RAAR)*, 2(2), 193. <https://doi.org/10.30595/raar.v2i2.14302>
- Putri Pramudya, A. H. (2022). Self Assessment In Tax Law. *Devotion: Journal of Research and Community Service*, 3(13), 2417–2432. <https://doi.org/10.36418/dev.v3i13.292>
- Sahm, C. (2019). Direct Stimulus Payments to Individuals. *Recession Ready: Fiscal Policies to Stabilize the American Economy*, 67–92. [https://www.hamiltonproject.org/assets/files/Sahm\\_web\\_20190506.pdf](https://www.hamiltonproject.org/assets/files/Sahm_web_20190506.pdf)
- Subagyo, A., & Saleh, D. M. (2023). the Liability of Tax Officials for the Expiration of Tax Debt Billing. *Journal Of Law Theory And Law Enforcement*, 2(January), 105–121.
- Sukardi, D. (2021). the Legal Responsibility of Debtor To Payment Curators in Bankruptcy Situation. *Jurnal Pembaharuan Hukum*, 8(2), 142. <https://doi.org/10.26532/jph.v8i2.15905>
- Sutrisno, S. (2020). Legal Protection for Debtors over Separatist Creditors' Rights Related To Bankruptcy. *Jurnal Akta*, 7(1), 83. <https://doi.org/10.30659/akta.v7i1.9453>
- Tryandari, M. (2021). Legal Protection for Bankruptcy Curators in the Resolution of Bankruptcy Cases. *Journal of Law and Legal Reform*, 2(3), 421–438.
- Wibowo, S. P., Muslim, J., & Hastuti, N. T. (2020). Urgency of Legal Certainty Towards Implementation of Curators Duties and Authorities. *JournalNX*, 6(6), 645–654. <https://www.neliti.com/publications/336804/urgency-of-legal-certainty-towards-implementation-of-curators-duties-and-authori>
- Winanto, Sulistiyono, A., & Muryanto, Y. T. (2019). Analysis of Equality on Creditor Standing Principle on The Process of Arrangement and Settlement of Bankruptcy Asset in Indonesia. *3rd International Conference on Globalization of Law and Local Wisdom (ICGLOW 2019)*, 358(Icglow), 286–288. <https://doi.org/10.2991/icglow-19.2019.71>
- Othman, M. K. H., Idris, N. F. H. M., Yusof, M. R., Nawli, M. A. M., Zain, F. M., Hussain, M. A., & Hashim, A. (2024). Expert Verification of Items under VARK Dimensions in Smart Quran Model Development Instrument in Teaching and Facilitation of Quran Hifz. *Pakistan Journal of Life and Social Sciences*
- Jassim, S. A. (2024). Risks of Gully Erosion in Valley (Wadi) Mazrwan Basin in Erbil Governorate Within Kurdistan Region of Iraq. *Pakistan Journal of Life and Social Sciences*