



THE FIRST INDUSTRIAL REVOLUTION OF AI IN TAX

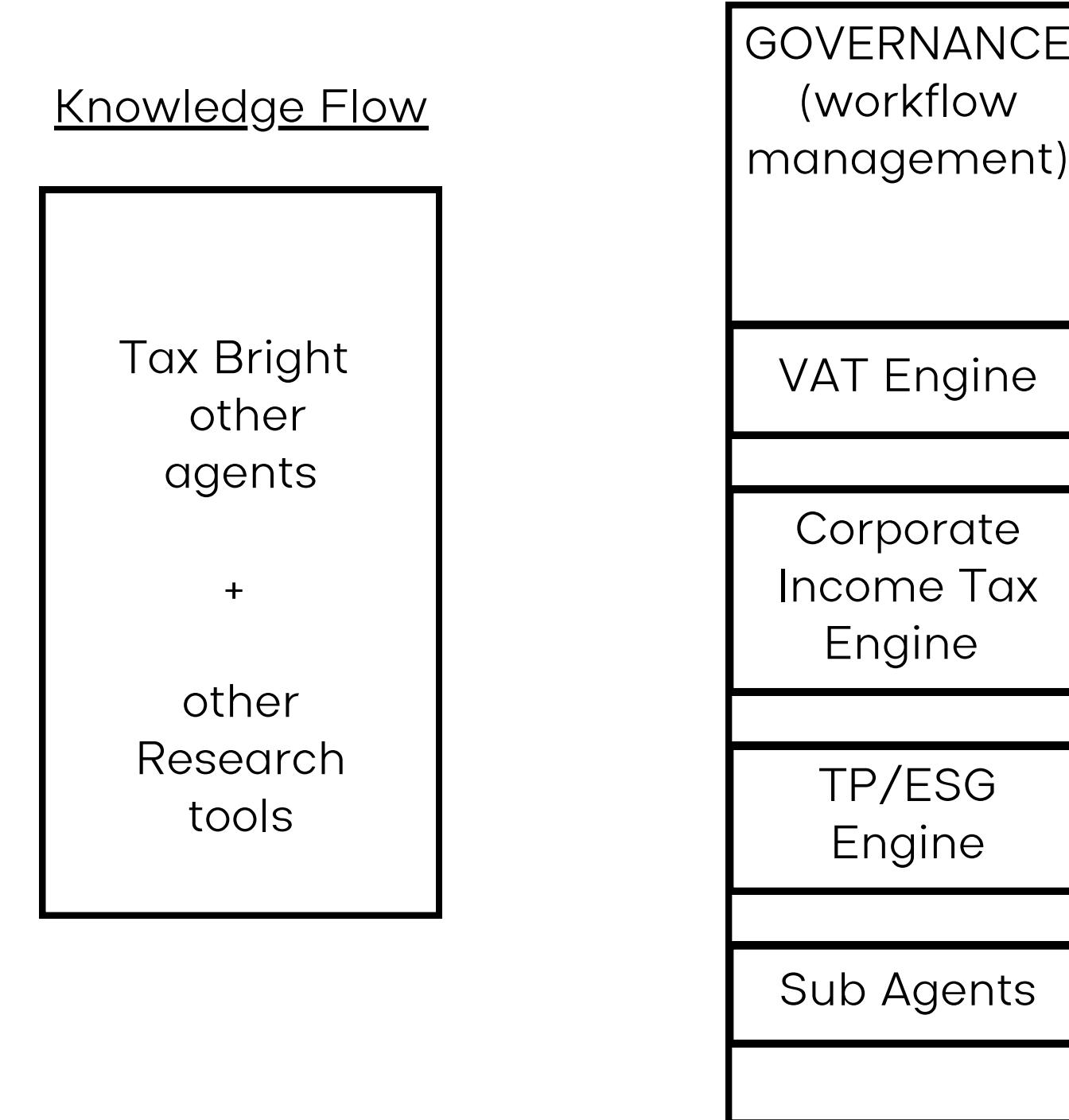
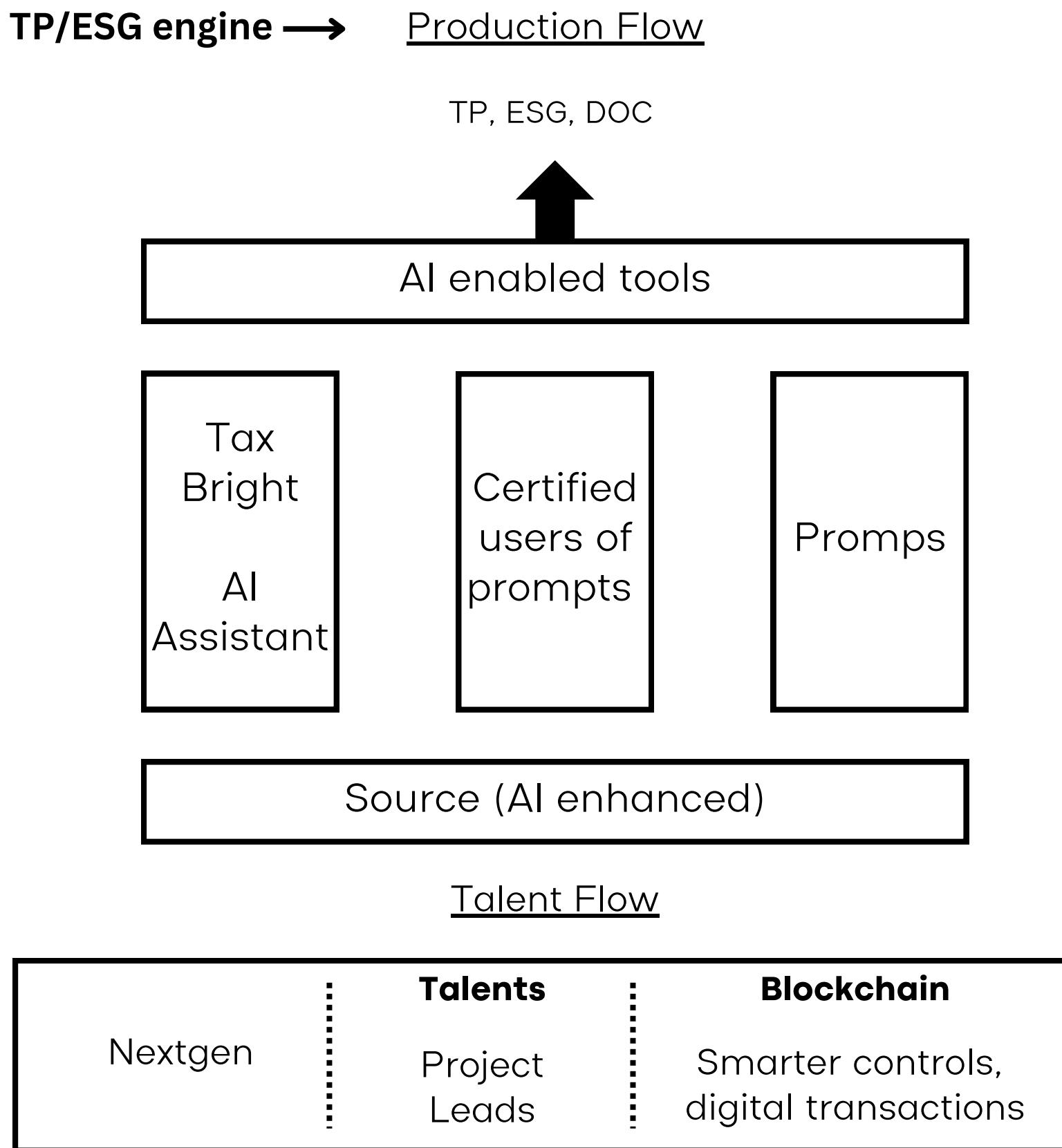
Online Webinar

Speakers

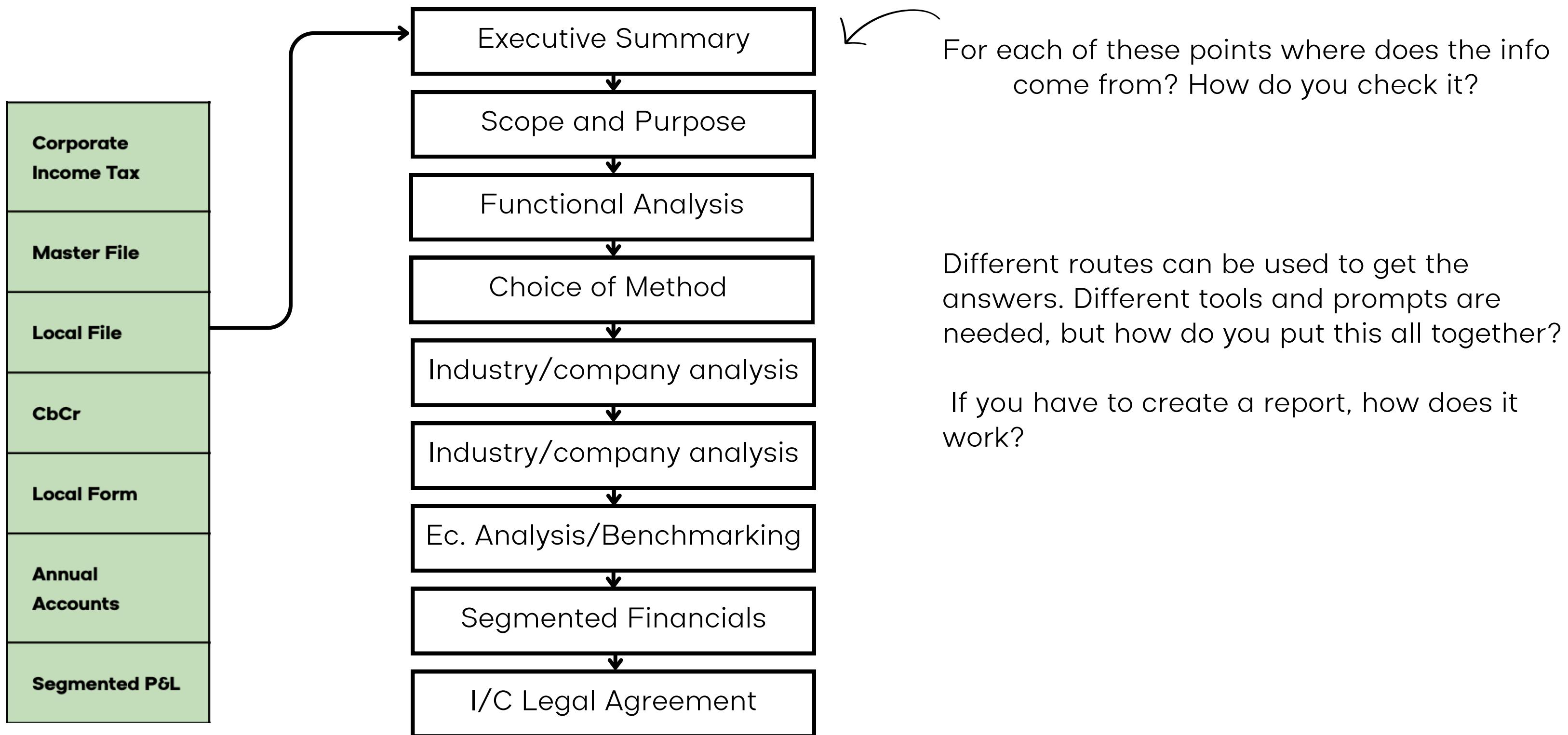
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AI's Role in Tax Strategy & Planning



How to produce the chapters of a local file with AI



AI in Tax Research & Legal Analysis:

How would you conduct a legal analysis if you had 10000 cases?

1) Define purpose: Identify the goal (e.g., predicting case outcomes, evaluating firm performance, analyzing judge behavior).

2) Select Key Data Points: Focus on relevant factors like ruling patterns, trends, and legal contexts.

3) Use Data Analysis Methods:

Descriptive <i>Describing the Past</i> <ul style="list-style-type: none">• Sift through large volumes of data to describe what's happened• Identify and analyze trends• Answer questions like "What happened?", "How many?", "Where?" and "When?"	Diagnostic <i>Understanding the Past</i> <ul style="list-style-type: none">• Analyze historical trends and patterns to better understand cause• Answer questions like "Why did that happen" and "What caused it?"
Predictive <i>Forecasting the Future</i> <ul style="list-style-type: none">• Used machine learning, predictive modeling, and/or intelligent algorithms to predict what's likely to happen in the future• Answers the question, "What will happen?"	Prescriptive <i>Identifying the Best Path Forward</i> <ul style="list-style-type: none">• Uses historical data to prescribe a best path forward• Compares and contrasts multiple outcomes• Answers the question, "What should happen?"

4) Leverage AI & Machine Learning:

- Automate case research & pattern recognition.
- Enhance efficiency in compliance and legal decision-making.
- Utilize NLP & deep learning for advanced analysis.

Blue J - Creating Knowledge from Court Cases in the Country

List Tax Court cases with respect to Section 367(d) and valuation issues related to intangible assets where the taxpayer won

J The Tax Court cases with respect to Section 367(d) and valuation issues related to intangible assets where the taxpayer won are:

Medtronic Inc. et al. v. Commissioner (2016)

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CASE Medtronic Inc. et al. v. Commissioner, T.C. Memo. 2016-112 (2016)

CASE Eaton Corp. et al. v. Commissioner, T.C. Memo. 2017-147 (2017)

CASE Veritas Software Corp. et al. v. Commissioner, 133 T.C. 297 (2009)

Source: Blue J website

Research Expertly

blueJ

Can a stock acquisition result in acquisition of 197 intangibles?

Yes, a stock acquisition can result in the acquisition of Section 197 intangibles, but it depends on the specific circumstances and the application of certain tax provisions.

1. **Section 338 Election:** When a corporation acquires the stock of another corporation...

STATUTE § 197. Amortization of goodwill and certain other intangibles

REGULATION § 1.197-2. Amortization of goodwill and certain other intangibles

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Grow Your Expertise

Source: Blue J website

How Tax Authorities Use AI Tools to Challenge the Data Received from Tax Payers

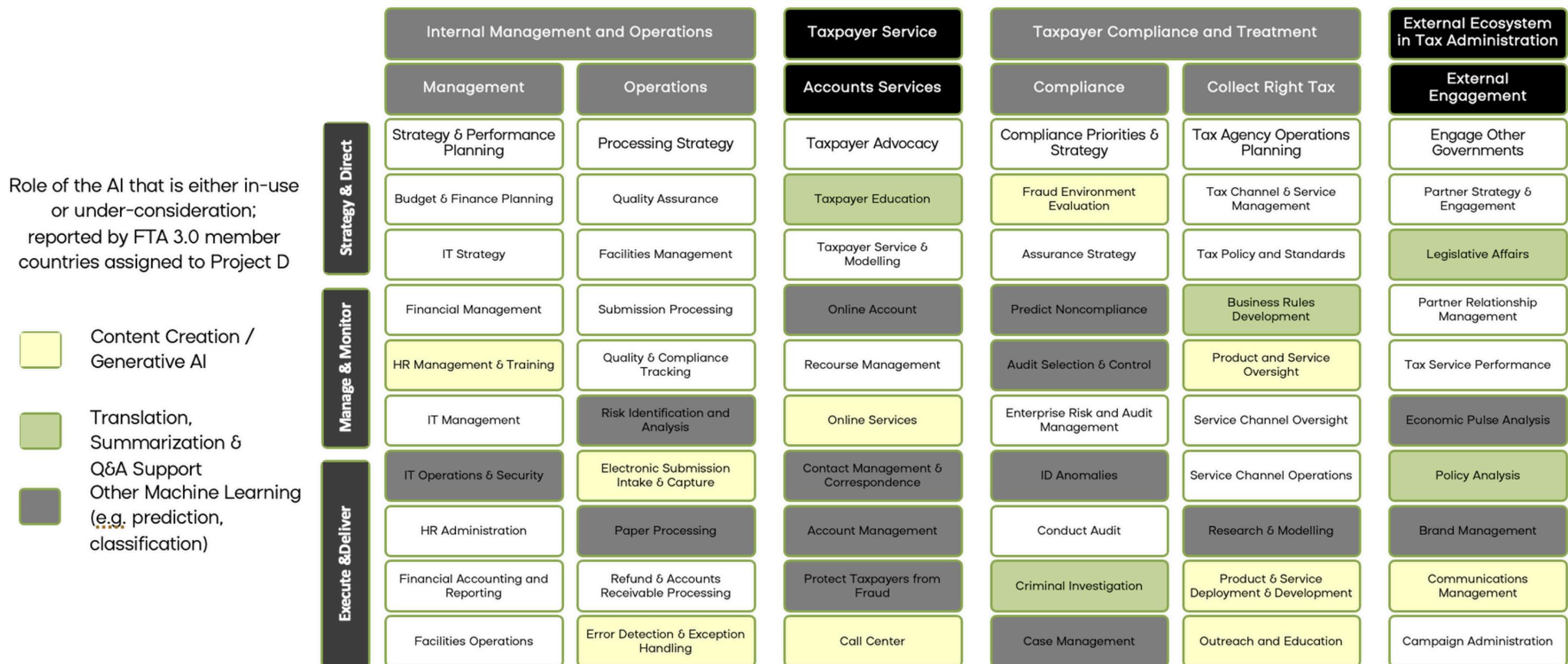
Enhancing the Trustworthy Use of AI in Tax Administration

Internal Management and Operations Sector	Customer Service Sector	Taxpayer Compliance and Treatment Sector	External Tax Ecosystem Sector
<p>Applying AI for:</p> <ul style="list-style-type: none">Automating logic for routine tasks such as low-risk HR actionsRecognising named entities to highlight key word categoriesPredicting customer demandNavigating knowledge repositories with Q&ACreating interactive visual trainingCategorising organisational data to enable efficient use	<p>Applying AI for:</p> <ul style="list-style-type: none">Translating languages in customer facing toolsHelping taxpayers establish payment plansEvaluating and assigning taxpayer situations for efficient processingClustering customer service issues.Protecting taxpayer accounts from theft or abuse	<p>Applying AI for:</p> <ul style="list-style-type: none">Predicting non-compliance in a consistent mannerIdentifying statistical anomalies and potential tax issues for further human reviewProtecting taxpayers from rare instances of preparer or tax professional fraudEvaluating unstructured data for risk-identification purposes	<p>Applying AI for:</p> <ul style="list-style-type: none">Translating tax code into a standardised format among several jurisdictionsOffering tax compliance pre-check via third-party provided digital servicesGenerating numerous mock tax scenarios to assist with external tool self-certificationEarly identification of unexpected issues with industry AI tax solutions through automation

Although AI use cases are prevalent in each of the above sectors, each use case has a specific AI method and risk profile.

Diagram of AI Use Cases Relative to Tax Administration Function and Functional Domain

(Already in Production or Under Consideration by Member Countries Across the Tax Enterprise)



Future Trends in AI & Taxation - What should you prepare for?



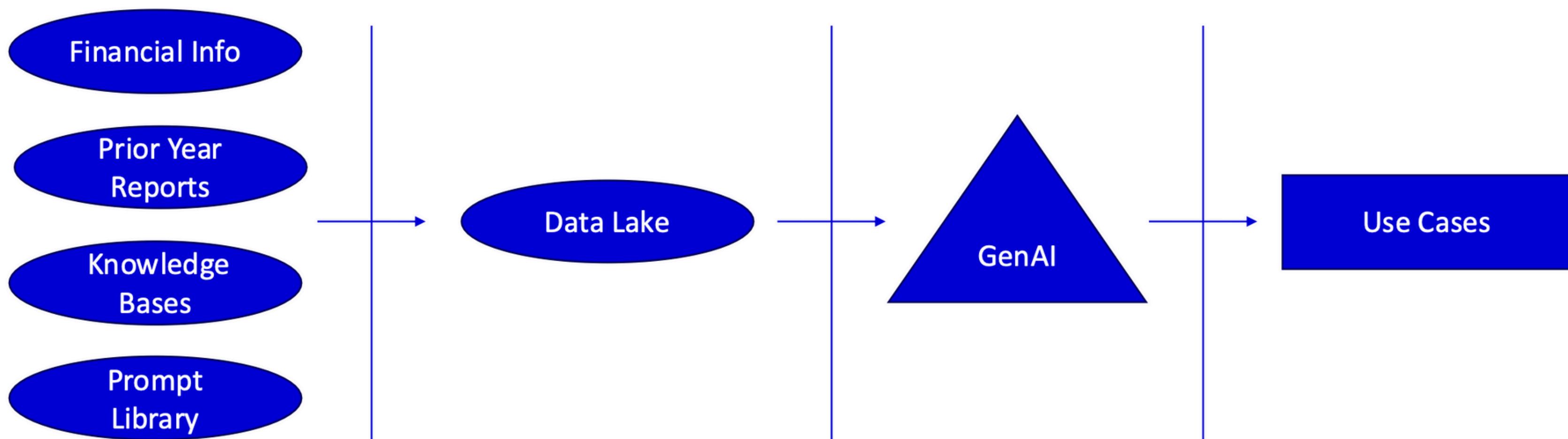
- Should you learn the game of prompting?
- Should you be an expert in process mining?
- What will be the balance between coding tax solutions vs low coding tax solutions.
- Who will be leading the tax department?

Appendix I: Reasoning Vs Non-Reasoning Models

- **Non-Reasoning Models:**
 - These models rely on **pattern recognition and statistical correlations** rather than logical inference.
 - They predict outputs based on learned associations without explicit reasoning.
- **Reasoning Models:**
 - These models **analyze, infer, and generate** conclusions based on **logical steps**.
 - They often require structured rules, knowledge bases, or step-by-step deduction.

Feature	Reasoning Models	Non-Reasoning Models
Approach	Logical, structured reasoning	Pattern-based recognition
Interpretability	High (clear reasoning process)	Low (black-box nature)
Limitations	Computationally expensive, requires structured data	Can be unpredictable, lacks logical steps
Use Cases	Explainable AI, Medical Diagnosis, Legal AI	Image Recognition, Speech Processing

Appendix I: BPMN Table



THANK YOU



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