不服審査 20 - 1

Administrative Review

(1) 再調査の請求

| Reques | st for re-examina | ation | | | | | 七年前頭沙肚業 | | | | | | | |
|---------------|---|--|--|---|--------------------------|----------------|--|------------------------------------|--------------------------|-------------------------|-------------------------|----------------------------------|--|--|
| | | N | | 年度要処理件 s processed for th | 数 e current fiscal ye | ar | 本年度処理済件数 Number of requests processed for the current fiscal year | | | | | | | |
| 区 | 分 | 前年度未決 繰越件数 Number of | 本年 | 度に請求した s requested for the co | 件数 | 計 Total | みなす 審査請求 件数 | みなす取下件数 | 取下件数 | 却下件数 | 棄却件数 | 全部取消件数 | | |
| Т | ype | unsettled requests carried over from the previous fiscal year | 処分に 係るもの Those related to procedure | 不作為に 係るもの Those related to nonfeasance | 小 計 Subtotal | 1 | Number of deemed requests for reconsideration | Number of deemed withdrawals | Number of withdrawals | Number of dismissals | Number of rejections | Number of whole annulments | | |
| | | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | | |
| 平成27年度 | FY2015 | 650 | 3, 186 | 5 | 3, 191 | 3, 841 | 84 | 52 | 268 | 375 | 2, 150 | 58 | | |
| 28 | 2016 | 641 | 1, 674 | _ | 1, 674 | 2, 315 | 20 | 32 | 223 | 208 | 1, 199 | 23 | | |
| 29 | 2017 | 510 | 1, 814 | _ | 1, 814 | 2, 324 | 4 | 12 | 192 | 200 | 1, 105 | 40 | | |
| 30 | 2018 | 598 | 2, 043 | - | 2, 043 | 2, 641 | 9 | - | 179 | 149 | 1, 549 | 27 | | |
| 令和元年度 | 2019 | 491 | 1, 359 | _ | 1, 359 | 1, 850 | 4 | _ | 183 | 125 | 1, 014 | 46 | | |
| 2 | 2020 | 337 | 1, 000 | _ | 1, 000 | 1, 337 | 1 | 9 | 115 | 95 | 679 | 4 | | |
| 申 告所得税 | Self-assessment income tax | 61 | 223 | _ | 223 | 284 | _ | _ | 6 | 24 | 137 | - | | |
| 源 泉 所得税 | Withholding income tax | 2 | 12 | - | 12 | 14 | | - | 1 | 3 | 8 | - | | |
| 法人税 | Corporation tax | 43 | 121 | - | 121 | 164 | | 5 | 22 | - | 63 | 3 | | |
| 相続税 | Inheritance tax | 14 | 42 | - | 42 | 56 | 1 | - | 4 | - | 40 | - | | |
| 贈与税 | Gift tax | - | 3 | _ | 3 | 3 | - | - | - | - | 3 | - | | |
| 消費税 | Consumption tax | 60 | 150 | _ | 150 | 210 | _ | - | 30 | 15 | 111 | - | | |
| 酒 税 | Liquor tax | - | - | - | - | - | - | - | - | - | - | - | | |
| 復興特別 所 得 税 | Special Income Tax for Reconstruction | 56 | 178 | _ | 178 | 234 | - | - | 7 | 23 | 133 | - | | |
| 復興特別法 人 税 | Special Corporate Income Tax for Reconstruction | 8 | 14 | _ | 14 | 22 | - | 1 | 2 | - | 7 | - | | |
| 地 方 消費税 | Local consumption tax | 60 | 150 | _ | 150 | 210 | - | - | 30 | 15 | 111 | - | | |
| 地 方 法人税 | Local corporation tax | 18 | 75 | _ | 75 | 93 | _ | 3 | 7 | _ | 45 | 1 | | |
| その他 | Others | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | - | | |
| 小計 | Subtotal | 322 | 968 | _ | 968 | 1, 290 | 1 | 9 | 109 | 80 | 658 | 4 | | |
| 徴収関係 | Related to collection | 15 | 32 | _ | 32 | 47 | _ | _ | 6 | 15 | 21 | - | | |
| 合 計 | Total | 337 | 1, 000 | _ | 1, 000 | 1, 337 | 1 | 9 | 115 | 95 | 679 | , | | |

⁽注) 1 内書は国税庁・国税不服審判所分の件数である。 2 平成27年度以前については、「異議申立て」に係るものである。 3 平成28年度以降について、税務署長等の処分が平成28年3月31日以前に行われている場合は、「異議申立て」に係るものである。

(単位:件)

| | | | (半位・什) | | |
|---|----------------------|----------------|--|--------------------------|---|
| | arm v. la. tal. vict | (N | umber of cases) | | 人たった 4 □ 4 □ 2 さ △ たったっしゅしょってった 7 □ 1 □ 1 □ 1 □ 1 □ 1 □ 1 □ 1 □ 1 □ 1 □ |
| 本年度処 Number of requ for the curre | ests processed | | 本年度未決繰越件数 | 調査対象等: | 令和2年4月1日から令和3年3月31日までの間に国税通則法及び行政不服審査法(行政機関の保有する情報の公開に関する法律に関するものを除く。)に基づき「再調査の請求」及び「審査請求」のなされたもの |
| 一部 取消件数 | 変更その他 | 計 Total | Carried forward unsettled requests for the | 用語の説明:1 | を掲げた。 不作為 とは、行政庁が法令に基づく申請に対し、相当の期間内になん らかの処分その他公権力の行使に当たる行為をすべきにもかかわらず、 |
| Number of partial annulments | Amendment and others | 2 | current fiscal year ①-② | 2 | これをしないことをいう。 みなす審査請求 とは、国税局長又は税務署長等が再調査の請求を審査 請求として取り扱うことを適当と認め、かつ、再調査の請求人がそれに 同意したとき、あるいは更正決定等について審査請求がされている場合 |
| 内 Including | 内 Including | 内 Including | 内 Including | | に、その更正決定等に係る課税標準等についてされた他の更正決定等に 対し再調査の請求がされたときに審査請求がされたものとみなされたも のをいう。 |
| 212 | 1 | 3, 200 | 641 | 3 | みなす取下げとは、再調査決定を経ないで審査請求がされた場合に取り下げられたものとみなされた再調査の請求及び審査請求がされた日以 |
| 100 | - | 1, 805 | 510 | 4 | 前に再調査の請求に係る処分の全部を取り消す旨の再調査決定書の謄本 を発している場合に取り下げられたものとみなされた審査請求をいう。 取下げとは、不服申立人が再調査の請求又は審査請求を撤回したもの |
| 173 | - | 1, 726 | 598 | 5 | をいう。 却下 とは、不服申立ての要件を欠いているため審査の対象にならない |
| 237 | - | 2, 150 | 491 | 6 | と判定されたものをいう。 棄却 とは、原処分を適法又は妥当と認め不服申立てが認められなかっ たものをいう。 |
| 141 | - | 1, 513 | 337 | 7 | 取消し又は変更とは、原処分の全部又は一部に違法又は不当を認め、 原処分の全部又は一部を取り消し、又は変更するものをいう。 |
| 96 | - | 999 | 338 | | |
| 24 | - | 191 | 93 | | |
| - | - | 12 | 2 | Subject of survey, etc.: | Requests for re-examination, and Requests for reconsideration filed on the basis of General Law of National Taxes and Administrative Appellate Law (except for Law Concerning Access to Information Held by Administrative Organs) between April 1,2020 and March 31, 2021. |
| 12 | - | 105 | 59 | Terminology: 1 | "Nonfeasance" means that an administrative agency do not execute power of public body such as procedures and others within certain period of time with respect to the application based on the law although they should do that. "Deemed requests for reconsideration" means requests for re-examination which were |
| 6 | = | 51 | 5 | | deemed requests for reconsideration. A request for re-examination is deemed to be a request for reconsideration in the cases such as when Regional Commissioner of the Regional Taxation Bureau or Director of Tax Office considered it appropriate to handle a request for reexamination as a request for reconsideration and the person who filed the request for re- |
| _ | - | 3 | _ | | examination agreed with it, or when a request for reconsideration was filed against a correction or determination, etc., and in that situation a request for re-examination was filed against another correction or determination, etc. which was made about tax base, etc. related to the former correction or determination, etc. |
| 11 | - | 167 | 43 | 3 | withdrawn. A request for re-examination is deemed to be withdrawn when a request for re-examination was filed without waiting for a decision on the request for re-examination. A |
| _ | - | _ | _ | 4 | request for reconsideration is also deemed to be withdrawn when an attested copy of decision on the request for re-examination which annuls wholly the procedures related to the request for re-examination, was issued previous to the date of filing of the request for reconsideration. "Withdrawal" means withdrawal of a request for re-examination or a request for |
| 24 | - | 187 | 47 | 5 | consideration due to the lack of requirements for an administrative protest. |
| _ | - | 10 | 12 | 7 | administrative protest is not accepted. |
| 11 | - | 167 | 43 | | |
| 8 | - | 64 | 29 | | |
| _ | - | _ | _ | | |
| 96 | - | 957 | 333 | | |
| _ | - | 42 | 5 | | |
| 96 | - | 999 | 338 | | |

Note:1 Figures preceded by "Including" are those for National Tax Tribunal or National Tax Agency .

 $^{2\ \}mathrm{Figures}$ on or before FY2015 are the figures of requests for reinvestigation.

³ Figures on and after FY2016 include the figures of requests for reinvestigation for the decision made by the District Director of the Tax Office, etc. on or before March 31,2016.

(2) 審查請求
Request for reconsideration

| Keque | est for reconside | eration | | | | | |
|---------------|---|--|---------------------------------------|---|---|----------------|----------------|
| | | | | 本年度要処理件数 | | | |
| | | | Number of reques | ts to be processed for the | | | |
| 区 | \triangle | 前年度 | N. | | 求した件数 I for the current fiscal ye | ar | 計 Total |
| | 分 _{7pe} | 刊千度 未決繰越件数 Number of unsettled requests carried over from the previous fiscal year | 処分に係るもの Those related to procedure | 不作為に係るもの Those related to nonfeasance | みなす 審査請求件数 Number of deemed requests for reconsideration | 小 計 | ① |
| | | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including |
| 平成27年度 | FY2015 | 1, 620 | 2, 009 | 4 5 | 84 | 2, 098 | 3, 718 |
| 28 | 2016 | 1, 407 | 2, 464 | 4 4 | 20 | 2, 488 | 4 3, 895 |
| 29 | 2017 | 1, 936 | 5 2, 945 | 4 4 | 4 | 9 2, 953 | 9 4, 889 |
| 30 | 2018 | 7 2, 414 | 1 3, 093 | 2 2 | 9 | 3 3, 104 | 10 5, 518 |
| 令和元年度 | 2019 | 2, 595 | 1 2, 557 | 2 2 | 4 | 3 2, 563 | 3 5, 158 |
| 2 | 2020 | 2, 312 | 1 2, 234 | 2 2 | 1 | 3 2, 237 | 3 4, 549 |
| 申 告 所得税 | Self-assessment income tax | 357 | 1 390 | 2 | _ | 3 392 | 3 749 |
| 源 泉 所得税 | Withholding income tax | 28 | 21 | _ | _ | 21 | 49 |
| 法人税 | Corporation tax | 308 | 196 | _ | _ | 196 | 504 |
| 相続税 | Inheritance tax | 109 | 169 | _ | 1 | 170 | 279 |
| 贈与税 | Gift tax | 33 | 9 | _ | _ | 9 | 42 |
| 消費税 | Consumption tax | 442 | 415 | _ | _ | 415 | 857 |
| 酒 税 | Riquor tax | _ | _ | _ | _ | _ | _ |
| 復興特別 所 得 税 | Special Income Tax for Reconstruction | 320 | 383 | _ | _ | 383 | 703 |
| 復興特別 法 人 税 | Special Corporate Income Tax for Reconstruction | 60 | 17 | _ | _ | 17 | 77 |
| 地 方 消費税 | Local consumption tax | 442 | 415 | _ | _ | 415 | 857 |
| 地 方 法人税 | Local corporation tax | 128 | 116 | - | - | 116 | 244 |
| その他 | Others | 2 | 6 | _ | _ | 6 | 8 |
| 小計 | Subtotal | 2, 229 | 2, 137 | 2 | 1 | 2, 140 | 4, 369 |
| 徴収関係 | Related to collection | 83 | 97 | _ | _ | 97 | 180 |
| 合 計 | Total | 2, 312 | 2, 234 | 2 | 1 | 2, 237 | 3 4, 549 |

⁽注) 内書は国税庁・国税局分の件数である。

 $Note: Figures\ preceded\ by\ "Including"\ are\ those\ for\ National\ Tax\ Agency\ or\ Regional\ Taxation\ Bureaus.$

(単位:件) (Number of cases)

| umber of cases | (N | | | | | | | | | | |
|--|------------|---|------------|------|--------------------------------------|--|--|---------------------------------|---------------------------------|----------------------------------|---|
| | | +/ | | | | ar | | 年度処理済件 processed for the | | NT. | |
| 分 yype | 区 T | 本年度 未決繰越件数 Carried forward unsettled requests for the current fiscal year ①-② | 計 Total | | 変更 その他 Amendment and others | 一部 取消件数 Number of partial annulments | 全部 取消件数 Number of whole annulments | 棄却件数 Number of rejections | 却下件数 Number of dismissals | 取下件数 Number of withdrawals | みなす 取下件数 Number of deemed withdrawals |
| | | 内 Including | | In | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including |
| FY2015 | 平成27年度 | 1, 407 | 2, 311 | 4 | - | 147 | 37 | 1, 615 | 4 289 | 223 | - |
| 2016 | 28 | 1, 936 | 1, 959 | - 4 | _ | 192 | 49 | 1, 258 | 4 191 | 269 | - |
| 2017 | 29 | 7 2, 414 | 2, 475 | _ 2 | - | 148 | 54 | 1, 840 | 186 | 2 247 | - |
| 2018 | 30 | 2, 595 | 2, 923 | - 10 | - | 139 | 77 | 2 2, 310 | 8 136 | 261 | - |
| 2019 | 令和元年度 | 2, 312 | 2, 846 | - 3 | - | 285 | 90 | 1, 989 | 3 134 | 348 | - |
| 2020 | 2 | 1 2, 221 | 2, 328 | - 2 | _ | 168 | 65 | 1, 803 | 2 93 | 199 | - |
| Self-assessmen income tax | 申 告 所得税 | 1 383 | 366 | 2 | _ | 34 | 4 | 277 | 2 11 | 40 | - |
| Withholding income tax | 源 泉 所得税 | 30 | 19 | - | _ | 2 | - | 13 | 1 | 3 | - |
| Corporation ta | 法人税 | 271 | 233 | - | - | 11 | 16 | 189 | 3 | 14 | - |
| Inheritance tax | 相続税 | 168 | 111 | - | _ | 20 | 9 | 59 | 7 | 16 | - |
| Gift tax | 贈与税 | 10 | 32 | - | - | 4 | - | 21 | - | 7 | - |
| Consumption tax | 消費税 | 401 | 456 | - | - | 27 | 8 | 388 | 2 | 31 | - |
| Riquor tax | 酒税 | - | _ | - | _ | - | - | _ | _ | _ | - |
| Special Income Tax for Reconstruction | 復興特別 所 得 税 | 366 | 337 | - | _ | 35 | 4 | 256 | 3 | 39 | - |
| Special Corporat Income Tax for Reconstruction | 復興特別法 人 税 | 38 | 39 | - | _ | 1 | 4 | 31 | 3 | _ | - |
| Local consumption tax | 地方消費税 | 401 | 456 | - | - | 27 | 8 | 388 | 2 | 31 | - |
| Local corporation tax | 地 方法人税 | 121 | 123 | - | - | 5 | 7 | 102 | 1 | 8 | - |
| Others | その他 | 3 | 5 | - | _ | 1 | _ | 1 | 2 | 1 | - |
| Subtotal | 小計 | 2, 192 | 2, 177 | - 2 | - | 167 | 60 | 1, 725 | 2 35 | 190 | - |
| Related to collection | 徴収関係 | 29 | 151 | - | - | 1 | 5 | 78 | 58 | 9 | - |
| Total | 合 計 | 2, 221 | 2, 328 | - 2 | - | 168 | 65 | 1, 803 | 2 93 | 199 | - |

国税局別の再調査の請求 (3)

Request for re-examination by Regional Taxation Bureaus

| | noque | or for to enamination by | Regional Taxation Dure | | 本年度要処理件数 sts to be processed for the c | urrent fiscal year | | |
|-------------------------------|-------|--------------------------|--|--|---|--------------------|----------|---|
| | 区 | 分 Type | 前年度 未決繰越件数 | | 本年度に請求した件数 ses requested for the curre | | 計 | みなす審査請求件数 |
| | | Туре | Carried forward unsettled requests for the current last year | 処分に係るもの Those related to procedure | 不作為に係るもの Those related to nonfeasance | 小 計 Subtotal | Total ① | Number of deemed requests for reconsideration |
| | 札 | 幌 Sapporo | 43 | 16 | _ | 16 | 59 | - |
| | 仙 | 台 Sendai | 5 | 9 | _ | 9 | 14 | - |
| | 関東何 | 言越 Kanto Shinetsu | 17 | 235 | - | 235 | 252 | - |
| ₽ | 東 | 京 Tokyo | 101 | 323 | - | 323 | 424 | - |
| egion | 金 | 沢 Kanazawa | - | 4 | - | 4 | 4 | - |
| al Ta | 名古 | 屋 Nagoya | 29 | 155 | - | 155 | 184 | - |
| 国 税 局Regional Taxation Bureau | 大 | 阪 Osaka | 16 | 104 | - | 104 | 120 | - |
| 1 Bur | 広 | 島 Hiroshima | 69 | 21 | - | 21 | 90 | 1 |
| au局 | 高 | 松 Takamatsu | 20 | 61 | - | 61 | 81 | - |
| | 福 | 置 Fukuoka | 14 | 63 | - | 63 | 77 | - |
| | 熊 | 本 Kumamoto | 7 | 9 | - | 9 | 16 | - |
| | (神 | 縄 Okinawa | 16 | - | - | _ | 16 | _ |
| É | 1 信 | Total | 337 | 1, 000 | _ | 1,000 | 1, 337 | 1 |

- この表は、「(1)再調査の請求」の合計欄を国税局別に示したものである。

Note:1 This table shows the breakdown of "Total" of "(1) Request for re-examination" by Regional Taxation Bureaus.

 $2\ Number\ of\ cases\ includes\ the\ number\ of\ requests\ for\ reinvestigation\ on\ or\ before\ March\ 31,2016.$

国税不服審判所支部別の審査請求

Request for reconsideration by branches of National Tax Tribunal

| | | | | Nur | | 処理件数 essed for the current fiscal y | /ear | |
|---------------------------------|-------|-------------------------------|--|--|---|---|-----------------|------------|
| | 区 | 分 Type | 前年度未決繰越件数 | | | 求した件数 I for the current fiscal year | | 計 Total |
| | | | Carried forward unsettled requests for the current last year | 処分に係るもの Those related to procedure | 不作為に係るもの Those related to nonfeasance | みなす 審査請求件数 Number of deemed requests for reconsideration | 小 計 Subtotal | 1 |
| | 札 | 幌 Sapporo | 64 | 94 | - | _ | 94 | 158 |
| | 仙 | ∯ Sendai | 187 | 92 | - | _ | 92 | 279 |
| | 関東信 | 言越 Kanto Shinetsu | 219 | 292 | - | _ | 292 | 511 |
| Bra 国 | 東 | 京 Tokyo | 709 | 725 | - | _ | 725 | 1, 434 |
| ncho | 金 | 沢 Kanazawa | 28 | 21 | - | _ | 21 | 49 |
| Branch of National Tax Tribunal | 名 古 | 屋 Nagoya | 243 | 194 | - | _ | 194 | 437 |
| ional | 大 | 阪 Osaka | 436 | 447 | - | _ | 447 | 883 |
| Tax T | 広 | Hiroshima | 62 | 133 | - | 1 | 134 | 196 |
| 支 | 高 | 松 Takamatsu | 116 | 53 | - | _ | 53 | 169 |
| E 制 | 福 | 置 Fukuoka | 103 | 112 | - | _ | 112 | 215 |
| | 熊 | 本 Kumamoto | 89 | 53 | - | _ | 53 | 142 |
| | 神 | 縄 Okinawa | 56 | 17 | - | _ | 17 | 73 |
| 国税を | 下服審 料 | 判所 National Tax Tribunal | _ | _ | - | _ | _ | _ |
| 国 | 税 | Transport National Tax Agency | _ | 1 | 2 | _ | 3 | 3 |
| î | 合 計 | Total | 2, 312 | 2, 234 | 2 | 1 | 2, 237 | 4, 549 |

- (注) 1 この表は、「(2)審査請求」の合計欄を国税不服審判所支部別に示したものである。
 - 2 国税庁の件数は、平成28年3月31日以前になされた処分又は法令に基づく申請に対する不作為に係る審査請求(国税局分)の件数を含んでいる。
- $Note: 1\ This\ table\ shows\ \ the\ breakdown\ of\ \ ``Total''\ \ of\ \ ``(2)\ Request\ for\ reconsideration''\ by\ branches\ of\ National\ Tax\ Tribunal.$
 - 2 Number of cases "National Tax Agency" includes the number of cases related to procedure or to nonfeasance with respect to the application based on the law (Regional Taxation Bureaus) before March 31,2016.

(単位:件) (Number of cases)

| | | | | | | | | (Number of cases) |
|---|----------------------------------|---------------------------------|---------------------------------|---|---|---------------------------------------|-----------------|---|
| | | 本年 | 度処理済件数 | | | | | |
| | N | umber of requests p | rocessed for the cur | rent fiscal year | | | | 本年度 |
| みなす 取下件数 Number of deemed withdrawals | 取下件数 Number of withdrawals | 却下件数 Number of dismissals | 棄却件数 Number of rejections | 全部 取消件数 Number of whole annulments | 一部 取消件数 Number of partial annulments | 変 更 その他 Amendment and others | 計 Total ② | 未決繰越件数 Carried forward unsettled requests for the current fiscal year ① - ② |
| - | - | 4 | 49 | _ | 6 | - | 59 | _ |
| - | 1 | 4 | 4 | - | 4 | - | 13 | 1 |
| - | 20 | 3 | 126 | - | 38 | - | 187 | 65 |
| 9 | 22 | 18 | 255 | _ | 14 | - | 318 | 106 |
| - | - | - | 2 | _ | _ | - | 2 | 2 |
| - | 2 | 3 | 74 | 4 | 17 | - | 100 | 84 |
| - | 1 | 3 | 65 | _ | 11 | - | 80 | 40 |
| - | 4 | 28 | 47 | _ | _ | - | 80 | 10 |
| - | - | 32 | 32 | _ | 6 | - | 70 | 11 |
| - | 57 | - | 8 | - | - | - | 65 | 12 |
| - | - | - | 9 | _ | - | - | 9 | 7 |
| - | 8 | _ | 8 | _ | - | _ | 16 | _ |
| 9 | 115 | 95 | 679 | 4 | 96 | _ | 999 | 338 |

(単位:件) (Number of cases)

| | | | | | | | | (Number of cases) |
|---|----------------------------------|---------------------------------|---------------------------------|---|---|---------------------------------------|-----------------|--|
| | | | 本年度処 | | | | | |
| | | Number | of requests processe | ed for the current fi | scal year | | | 本年度 |
| みなす 取下件数 Number of deemed withdrawals | 取下件数 Number of withdrawals | 却下件数 Number of dismissals | 棄却件数 Number of rejections | 全部 取消件数 Number of whole annulments | 一部 取消件数 Number of partial annulments | 変 更 その他 Amendment and others | 計 Total ② | 未決繰越件数 Carried forward unsettled requests for the current fiscal year ①-② |
| - | 5 | 12 | 66 | 6 | 8 | - | 97 | 61 |
| - | 4 | 1 | 150 | 4 | 8 | - | 167 | 112 |
| - | 28 | 4 | 160 | 9 | 13 | - | 214 | 297 |
| - | 35 | 21 | 486 | 6 | 11 | - | 559 | 875 |
| - | - | 3 | 28 | - | - | - | 31 | 18 |
| - | 58 | 2 | 140 | - | 1 | - | 201 | 236 |
| - | 11 | 43 | 471 | 27 | 64 | - | 616 | 267 |
| - | 28 | _ | 19 | 13 | 34 | - | 94 | 102 |
| - | 1 | 3 | 115 | - | 4 | - | 123 | 46 |
| - | 19 | - | 33 | - | 20 | - | 72 | 143 |
| - | 9 | 2 | 95 | - | - | - | 106 | 36 |
| - | 1 | - | 40 | _ | 5 | - | 46 | 27 |
| _ | - | _ | - | _ | - | - | - | _ |
| - | - | 2 | - | - | - | - | 2 | 1 |
| _ | 199 | 93 | 1, 803 | 65 | 168 | _ | 2, 328 | 2, 221 |

訴訟事件 20 - 2Litigation Cases

(1) 国側被告事件

Litigation cases (Government as defendant)

(単位:件)

| (Nur | nher | of | casi |
|-------|------|----|------|
| (INUI | nber | OI | Cast |

| | | | | 事件区 | | | 本年度網 | 佟結件数 | Numbe | er of cases p | rocessed for | the current | fiscal year | | |
|-----------------------------|-----|--------------------|---|---|---|------------|-----------|---------------------------------------|--|-----------------------------------|--------------|----------------|-------------|-------|--|
| | | 区分 | 前年度 末係属 件 数 | 分の変 更調 件 数 | 本年度 提 姓 | 取 下件 数 | 却下件数 | 国勝鉄 | 国側一部勝訴件 数 | 国敗作数 | 差 戻件 数 | 和解件数 | その他 | 計 | 本年度 末係属 件 数 |
| | | Туре | Number of pending cases at the end of the previous fiscal year | Number of arranged cases such as change of jurisdiction | Number of cases filed for the current fiscal year | Withdrawal | Dismissal | Decision in favor of Government | Decision partially in favor of Government | Decision against Government | Remand | Reconciliation | Others | Total | Number of pending cases at the end of the current fiscal year |
| (2 | 第一審 | The first instance | | | | | | | | | | | | | |
| | | 所得税 *1 | 73 | - | 26 | 1 | 1 | 29 | 3 | 1 | - | - | - | 35 | 64 |
| Cas | 課 | 法人税 *2 | 32 | _ | 17 | 3 | 1 | 12 | 3 | _ | _ | _ | - | 19 | 30 |
| es re | | 資産税 *3 | 11 | - | 12 | _ | 2 | 6 | 1 | 2 | _ | - | - | 11 | 12 |
| Cases related to taxation | 税 | 消費税 *4 | 18 | - | 8 | 1 | 1 | 8 | - | 1 | - | - | - | 11 | 15 |
| d to t | 関 | 酒税 *5 | - | - | _ | _ | - | - | - | _ | _ | - | - | _ | - |
| axat | 175 | 他の間接税 *6 | - | - | 1 | - | - | - | - | - | - | - | - | - | 1 |
| ion | 係 | その他 *7 | 5 | - | 3 | _ | - | 4 | - | _ | _ | - | - | 4 | 4 |
| | | 小 計 *8 | 139 | - | 67 | 5 | 5 | 59 | 7 | 4 | _ | - | - | 80 | 126 |
| Cas | | ∫行政事件 *9 | 7 | - | 11 | 1 | 1 | 5 | - | - | - | - | - | 7 | 11 |
| es re | 徴 | 執行停止 *10 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| Cases related to collection | 収 | 損害賠償 *11 | - | - | 1 | - | - | _ | - | _ | - | _ | - | - | 1 |
| l to c | 関係 | その他民事*12 | 4 | - | _ | - | _ | 2 | - | _ | - | - | - | 2 | 2 |
| ollec | ।कर | 非訟事件等*13 | - | - | _ | - | - | _ | - | _ | - | _ | - | - | - |
| tion | | (小 計 *8 | 11 | _ | 12 | 1 | 1 | 7 | - | - | - | - | - | 9 | 14 |
| | | 判所関係 * 14 | - | _ | 2 | 1 | - | - | - | - | - | _ | - | 1 | 1 |
| | 合 | 計 *15 | 150 | - | 81 | 7 | 6 | 66 | 7 | 4 | - | - | - | 90 | 141 |
| (‡ | 空訴審 | Trial of an appeal | | | | | | | | | | | | | |
| | | 所得税 *1 | 8 | - | 21 | - | - | 15 | - | - | - | - | _ | 15 | 14 |
| Ca | 課 | 法人税 *2 | 7 | _ | 14 | - | _ | 13 | - | 1 | _ | _ | _ | 14 | 7 |
| Cases related | | 資産税 *3 | 5 | _ | 7 | - | _ | 6 | - | _ | _ | _ | _ | 6 | 6 |
| elate | 税 | 消費税 *4 | 7 | _ | 5 | - | - | 6 | - | _ | _ | _ | _ | 6 | 6 |
| 5 | 関 | 酒税 *5 | - | _ | _ | - | _ | _ | - | _ | _ | _ | _ | - | - |
| taxaı | - | 他の間接税 *6 | - | _ | _ | - | _ | _ | - | _ | - | _ | _ | - | - |

調査対象等:令和2年4月1日から令和3年3月31日までの間における国税の賦課又は徴収関係に関する訴訟事件について掲げた。

用語の説明:1 取下げとは、原告が訴えを撤回したものをいう。

29

1

2

3

32

- 2 却下とは、訴訟要件又は上訴の要件が具備されていないため不適法として排斥されたものをいう。
- 3 差戻しとは、上級審で原判決を取り消した場合に、審査をやり直させるため改めて控訴審又は第一審に移審されたものをいう。

42

5

3

8

1

51

4 和解とは、争っている当事者が互いに譲歩して争いをやめたものをいう。

47

8

1

56

*1 Income tax

係

収 関

係

Cases related to collection

その他 *7

小 計 *8

行政事件 *9

執行停止 *10 損害賠償 *11

その他民事*12

非訟事件等 *13

計 *15

小 計 *8

審判所関係 *14

*2 Corporation tax

*3 Property tax *4 Consumption tax *5 Liquor tax

*6 Other indirect taxes

*7 Others *8 Subtotal *9 Administrative litigations

*10 Suspension of execution

*11 Compensation for damage *12 Other civil cases

*13 Non-contentious cases *14 Cases related to Tribunal

43

9

53

33

1

2

35

*15 Total

*16 Grandtotal

(単位:件) (Number of cases)

| | | | | | | | | | | | | | (Numbe | r of cases) |
|-------------------------------------|----------------------------------|-------------------------|----------------------------|--------------------------|----------------|-----------|-------------------------|--------------------------|---------------------|---------------|----------------|---------------|--------|----------------------------|
| | | 26 Fr Pr | 事件区 | 4 F F | | 本年度 | 終結件数 | Numb | er of cases p | processed for | the curren | t fiscal year | | |
| | | 前年度末係属 | 分の変 更等の | 本年度 提 起 | 取下 | 却下 | 国 側 | 国側一 | 国側 | 差戻 | 和解 | | | 本年度 |
| | | 件 数 | 調整 | 件 数 | 件数 | 件 数 | 勝 訴件 数 | 部勝訴 件 数 | 敗 訴件 数 | 件 数 | 件数 | その他 | 計 | 件 数 |
| | 区 分 Type | N 1 C | 件数 | N 1 6 | W-1 1 | D: : 1 | | | | D 1 | Reconciliation | 0.1 | 70 . 1 | N 1 6 |
| | | Number of pending | Number of arranged | Number of cases filed | Withdrawa l | Dismissal | Decision in favor of | Decision partially in | Decision against | Remand | Reconciliation | Others | Total | Number of pending |
| | | cases at the end of the | cases such as change of | for the current | | | Government | favor of Government | Government | | | | | cases at the end of the |
| | | previous fiscal year | jurisdiction | fiscal year | | | | | | | | | | current fiscal year |
| (上告 | 審) Hearing of final appeal | | | | | | | | | | | | | |
| | 所得税 *1 | 5 | - | 9 | - | 1 | 8 | _ | - | - | - | - | 9 | 5 |
| Cas | 业 法人税 *2 | 5 | _ | 6 | _ | _ | 4 | _ | 2 | _ | _ | - | 6 | 5 |
| sesr | 資産税 *3 | 5 | _ | 5 | - | - | 6 | - | - | - | - | - | 6 | 4 |
| Cases related | 消費税 *4 | 5 | _ | 2 | - | 1 | 5 | - | - | - | - | - | 6 | 1 |
| d to | ■ 酒税 *5 | 5 | _ | _ | _ | 5 | - | _ | _ | _ | _ | - | 5 | _ |
| to taxation | 他の間接税 *6 | _ | - | - | - | - | - | - | - | - | - | - | - | - |
| tion (| その他*7 | - | - | 2 | - | - | 2 | - | - | - | - | _ | 2 | - |
| | 小 計 *8 | 25 | - | 24 | - | 7 | 25 | - | 2 | - | - | - | 34 | 15 |
| Cas | (行政事件*9 | 1 | _ | 4 | - | _ | 1 | _ | _ | - | - | - | 1 | 4 |
| ses rel 省 | 執行停止 *10 | _ | - | - | - | - | - | - | - | - | - | - | - | - |
| 電車電標 Cases related to collection | | _ | _ | - | - | _ | - | _ | _ | - | - | - | - | - |
| l to c | | 2 | - | - | 1 | - | 1 | _ | - | - | - | - | 2 | - |
| collec | 非訟事件等 *13 | _ | _ | - | - | _ | - | _ | _ | - | - | - | - | - |
| tion | 小 計 *8 | 3 | - | 4 | 1 | - | 2 | _ | - | - | - | - | 3 | 4 |
| | 審判所関係 *14 | _ | _ | - | - | _ | - | _ | - | - | - | - | - | - |
| | 合 計* ₁₅ | 28 | - | 28 | 1 | 7 | 27 | _ | 2 | - | - | - | 37 | 19 |
| (| Total of cases at | | | | | | | | | | | | | |
| (番級) | 削合計) each order of judgements | | | | | | | | | | | | | |
| | ∫所得税 *1 | 86 | _ | 56 | 1 | 2 | 52 | 3 | 1 | _ | _ | _ | 59 | 83 |
| C | | 44 | _ | 37 | 3 | 1 | 29 | 3 | 3 | _ | _ | _ | 39 | 42 |
| ses I | 果 近久地 2 資産税 *3 | 21 | _ | 24 | _ | 2 | 18 | 1 | 2 | _ | _ | _ | 23 | 22 |
| elate | 消費税 *4 | 30 | _ | 15 | 1 | 2 | 19 | _ | 1 | _ | _ | _ | 23 | 22 |
| d to | ■ 酒税 *5 | 5 | _ | _ | _ | 5 | _ | _ | _ | _ | _ | _ | 5 | _ |
| 高麗 和 明 作 | 他の間接税 *6 | _ | _ | 1 | _ | _ | _ | _ | _ | _ | _ | _ | _ | 1 |
| ion 传 | その他*7 | 7 | _ | 5 | _ | _ | 8 | _ | _ | _ | _ | _ | 8 | 4 |
| | 小 計 *8 | 193 | _ | 138 | 5 | 12 | 126 | 7 | 7 | _ | _ | _ | 157 | 174 |
| Č. | (行政事件*9 | 9 | _ | 21 | 1 | 2 | 11 | _ | _ | _ | _ | _ | 14 | 16 |
| Cases | 劫行位 1. **。 | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| related 1 | ▼ 損害賠償 *11 | _ | _ | 1 | - | _ | _ | _ | _ | _ | _ | _ | _ | 1 |
| 1 2 13 | 1 1 4 (1) 41 早 平 19 | 8 | _ | 2 | 1 | _ | 6 | _ | _ | _ | _ | _ | 7 | 3 |
| collection | 非訟事件等 *13 | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| ection | 小 計 *8 | 17 | _ | 24 | 2 | 2 | 17 | _ | _ | _ | _ | _ | 21 | 20 |
| _ | 審判所関係 *14 | _ | _ | 3 | 1 | _ | 1 | - | _ | _ | _ | _ | 2 | 1 |
| | 合 計*16 | 210 | _ | 165 | 8 | 14 | 144 | 7 | 7 | _ | _ | _ | 180 | 195 |
| G 1.1 | | | | | · | | | | · | | | F1. 01. 0 | | 1 |

Subject of survey, etc. The tables show the statistics of litigation cases related to taxation or collection of national tax from Aplil 1, 2020 to March 31, 2021.

Terminology: 1 "Withdrawal" means suits cancelled by plaintiffs.

2 "Dismissal" means the decision rejecting a case due to the lack of requirements for litigation or appeal.

3 "Remand" means the decision sending a case back to a lower court or the first instance for the purpose of rehearing when a higher court annulled the original decision.

4 "Reconciliation" means the case where parties in conflict conceded each other and stopped disputing.

(2)国側原告事件

(単位:件)

| (2) 国侧床口事作 Litigation cases (G | | t ac plaint | iff) | | | | | | | | | | r of cases) |
|---|---|---|---|------------|-----------|---------------------------------------|--|-----------------------------------|------------|----------------|--------|--------|--|
| Litigation cases (G | overnmen | 事件区 本年度終結件数 Number of cases processed for the current fiscal | | | | | | | | | | (Numbe | r of cases) |
| 区 分 | 前年度 末係属 件 数 | 事分更調件 と変の整数 と変の整数 | 本年度 提 起 件 数 | 取 下件数 | 却下件数 | 国勝訴件数 | 国側一部勝訴件数 | 国 側 敗 訴 件 数 | 差 戻 件 数 | 和解件数 | その他 | 計 | 本年度 末係属 件 数 |
| Туре | Number of pending cases at the end of the previous fiscal year | Number of arranged cases such as change of jurisdiction | Number of cases filed for the current fiscal year | Withdrawal | Dismissal | Decision in favor of Government | Decision partially in favor of Government | Decision against Government | Remand | Reconciliation | Others | Total | Number of pending cases at the end of the current fiscal year |
| (第一審)The first instance | | | | | | | | | | | | | |
| 詐 害 行 為 *1 | 2 | - | 1 | - | - | _ | - | - | _ | 1 | - | 1 | 2 |
| 名 義 変 更 *2 | _ | _ | _ | _ | _ | _ | _ | - | _ | _ | _ | _ | _ |
| 債 権 取 立 *3 | 5 | _ | 2 | 1 | _ | - | 2 | - | - | - | - | 3 | 4 |
| その他民事 *4 | 4 | _ | 5 | 1 | _ | 6 | - | _ | _ | - | _ | 7 | 2 |
| ₹ 非 (支払督促 *5 | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| R全処分 *6 | _ | _ | 2 | _ | _ | 2 | _ | _ | _ | _ | _ | 2 | _ |
| 事 強制執行 *7 | 1 | _ | 1 | 1 | _ | _ | _ | _ | _ | _ | _ | 1 | 1 |
| Noncontentious cases 非訟事件等 大保領である。 大保領である。 大保領である。 大保領である。 大名は、大学では、大学では、大学では、大学では、大学では、大学では、大学では、大学で | 15 | _ | 87 | 2 | _ | _ | _ | _ | _ | _ | 85 | 87 | 15 |
| 合計 Total | 27 | _ | 98 | 5 | _ | 8 | 2 | _ | _ | 1 | 85 | 101 | 24 |
| (控訴審) Trial of an appeal | | | | | | | _ | | | - | | | |
| 非 害 行 為 * ₁ | _ | _ | _ | - | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| 名 義 変 更 *2 | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| 債 権 取 立 *3 | _ | _ | 1 | _ | _ | 1 | _ | _ | _ | _ | _ | 1 | _ |
| その他民事 *4 | _ | _ | 2 | _ | _ | 2 | _ | _ | _ | _ | _ | 2 | _ |
| | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| R全処分 *6 | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| 事 強制執行 *7 | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| Noncontentious cases Noncontentious cases Noncontentious cases | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| hes 合計 Total | _ | _ | 3 | _ | _ | 3 | _ | _ | _ | _ | _ | 3 | _ |
| (上告審)Hearing of | | | | | | | | | | | | | |
| final appeal | | | | | | | | | | | | | |
| 非 害 行 為 * ₁ | _ | _ | - | - | _ | - | - | - | - | - | - | - | - |
| 名 義 変 更 *2 | _ | - | - | _ | - | - | _ | _ | - | _ | _ | - | - |
| 債 権 取 立 *3 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| その他民事 *4 | - | - | 1 | - | - | - | - | - | - | - | - | - | 1 |
| Non 非 ∫ 支払督促 *5 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| R全処分 *6 | - | - | _ | _ | - | - | - | - | - | - | - | _ | _ |
| ntiou # 強制執行 *7 | - | - | - | - | - | - | _ | - | - | _ | - | - | - |
| sg 等 そ の 他 *8 | - | - | _ | _ | _ | _ | - | - | - | - | _ | - | _ |
| [®] 合計 Total | - | - | 1 | - | - | _ | - | _ | _ | _ | _ | _ | 1 |
| Total of cases | | | | | | | | | | | | | |
| (審級別合計)at each order of judgments | | | | | | | | | | | | | |
| | _ | | | | | | | | | | | | _ |
| 非 害 行 為 *1 | 2 | _ | 1 | _ | _ | _ | _ | _ | _ | 1 | _ | 1 | 2 |
| 名義変更*2 | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| 債権取立 *3 | 5 | _ | 3 | 1 | _ | 1 | 2 | _ | - | _ | _ | 4 | 4 |
| その他民事 *4 | 4 | _ | 8 | 1 | _ | 8 | _ | _ | - | _ | _ | 9 | 3 |
| Nonco 計 支払督促 *5 | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| ontent | _ | _ | 2 | _ | _ | 2 | _ | _ | _ | _ | _ | 2 | _ |
| 強制執行 *7 | 1 | - | 1 | 1 | _ | _ | _ | _ | _ | _ | _ | 1 | 1 |
| 表 支払 を を を を を を を を を を を を を | 15 | - | 87 | 2 | _ | _ | _ | _ | _ | | 85 | 87 | 15 |
| [®] 合計 Total | 27 | - (产 A £n 9 | 102 | 5 | | 11 | 2 | _ | ス 訴 沙 重 が | 1 | 85 | 104 | 25 |

調査対象等:令和2年4月1日から令和3年3月31日までの間における国税の徴収関係に関する訴訟事件について掲げた。

Subject of survey, etc.: The table shows the statistics of litigation cases related to collection of national tax from April 1, 2020 to March 31, 2021.

*1 Fraudulent deed

*5 Order for payment

*2 Change of name

*6 Preservative measure

*3 Collection of bonds

*7 Forcible execution

*4 Other civil cases

*8 Others

(3) 国側被告事件の国税局別内訳

(単位:件)

Breakdown of litigation cases (Government as defendant) by rRegional Taxation Bureaus

(Number of cases)

| | Бгеа | kaown oi | nugation | cases (G | overnment | as defend | ianu) by ri | kegionai i | axation i | oureaus | | | | | | | (Number | or cases) |
|---------------------------|-------|---------------------------|--|---|---|--------------------|-------------------------|------------|--|-----------|---------------------------------|---|-----------------------------|----------|----------------|--------|---------|---|
| | × | 分 Type | 前年度 末係属 件 数 | 事件区 変の 更調 件 数 | 本年度提起件数 Number of cases filed for the current fiscal year | | | | 本年度終結件数 Number of cases processed for the current fiscal year | | | | | | | | | 本年度 |
| | | | | | 第1審 | 控訴審 | 上告審 | 1111 | 取下 件数 | 却下件数 | 国側 勝訴 件数 | 国側 一部 勝斯 件数 | 国側 敗訴 件数 | 差戻 件数 | 和解件数 | その他 | 計 | 末係属 件 数 |
| 国税局 Regional Bureau | Taxat | ion | Number of pending cases at the end of the previous fiscal year | Number of arranged cases such as change of jurisdiction | The first instance | Trial of an appeal | Hearing of final appeal | Total | Withdrawal | Dismissal | Decision in favor of Government | Decision partially in favor of Government | Decision against Government | Remand | Reconciliation | Others | Total | Number of pending cases at the end of the current fiscal year |
| (課 税 | 関 | 係) Case | es related | to taxatio | on | | | | | | | | | | | | | |
| 札 | 幌 | Sapporo | 16 | - | - | 1 | 1 | 2 | - | 1 | 9 | - | - | - | - | - | 10 | 8 |
| 仙 | 台 | Sendai | 2 | - | 3 | - | - | 3 | - | 1 | 1 | - | - | - | - | - | 2 | 3 |
| 関東付 | 言越 | Kanto Shinetsu | 17 | - | 9 | 5 | 1 | 15 | - | 1 | 10 | 2 | 1 | _ | - | - | 14 | 18 |
| 東 | 京 | Tokyo | 84 | - | 21 | 20 | 8 | 49 | 1 | 3 | 44 | 3 | 4 | _ | - | - | 55 | 78 |
| 金 | 沢 | Kanazawa | - | - | 1 | - | _ | 1 | - | 1 | _ | - | - | _ | - | - | 1 | - |
| 名 古 | 屋 | Nagoya | 12 | - | 8 | 5 | - | 13 | - | 2 | 4 | 1 | - | - | - | - | 7 | 18 |
| 大 | 阪 | Osaka | 35 | - | 12 | 13 | 9 | 34 | 1 | 2 | 37 | - | - | - | - | - | 40 | 29 |
| 広 | 島 | Hiroshima | 11 | - | 2 | 1 | 2 | 5 | - | - | 8 | - | - | - | - | - | 8 | 8 |
| 高 | 松 | Takamatsu | 3 | - | 4 | - | 1 | 5 | 2 | - | 1 | 1 | 1 | - | - | - | 5 | 3 |
| 福 | 岡 | Fukuoka | 4 | - | 2 | 1 | - | 3 | - | - | 4 | - | - | - | - | - | 4 | 3 |
| 熊 | 本 | Kumamoto | 7 | - | 4 | 1 | 1 | 6 | - | 1 | 5 | - | 1 | - | - | - | 7 | 6 |
| 沖 | | | 2 | - | 1 | - | 1 | 2 | 1 | - | 3 | - | - | - | - | - | 4 | - |
| 小 | 計 | | 193 | - | 67 | 47 | 24 | 138 | 5 | 12 | 126 | 7 | 7 | - | - | - | 157 | 174 |
| | | | es related | to collecti | | | | | | | | | 1 | | | | | |
| 札 | 幌 | | _ | _ | 1 | - | - | 1 | - | - | - | - | - | - | - | - | - | 1 |
| 仙 | 台 | Sendai Kanto | _ | _ | _ | _ | _ | _ | - | - | - | - | - | - | - | _ | - | _ |
| 関東付 | | Shinetsu | 2 | - | 2 | 2 | 1 | 5 | - | - | 2 | - | - | - | - | - | 2 | 5 |
| 東 | 京 | - | 9 | - | 3 | 4 | 1 | 8 | 1 | - | 9 | - | - | - | - | - | 10 | 7 |
| 金 | | Kanazawa | _ | _ | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 名 古 | 屋 | | _ | _ | 2 | - | - | 2 | - | - | 1 | - | - | - | _ | - | 1 | 1 |
| 大広 | 阪皂 | | 3 | _ | 4 | - | 1 | 5 | 1 | 1 | 1 | _ | - | - | _ | _ | 3 | 5 |
| 高 | | Hiroshima Takamatsu | 2 | _ | _ | 1 | _ | 1 | _ | 1 | 2 | | _ | _ | _ | | 3 | _ |
| 福 | | Fukuoka | | _ | _ | 1 | 1 | 2 | | | 2 | | _ | | | | 2 | 1 |
| 熊 | | Kumamoto | _ | _ | | | _ | _ | _ | _ | _ | | _ | _ | _ | _ | _ | 1 |
| 沖 | | Okinawa | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ | _ |
| 小 | 計 | Subtotal | 17 | _ | 12 | 8 | 4 | 24 | 2 | 2 | 17 | _ | _ | _ | _ | _ | 21 | 20 |
| 審判原 | | National Tax | - | - | 2 | 1 | - | 3 | 1 | - | 1 | - | - | - | - | - | 2 | 1 |
| 合 | 計 | Tribuunal Total | 210 | _ | 81 | 56 | 28 | 165 | 8 | 14 | 144 | 7 | 7 | _ | _ | _ | 180 | 195 |
| | A1 | | 1) 団 (町 地 | | | 14. 同彩 5 | | 100 | | 1.7 | 177 | , | | | | | 100 | 100 |

 合 計 Total
 210
 81
 56
 28
 165
 8

 (注)この表は、「(1)国側被告事件」の合計欄を国税局別に示したものである。

 $Note: This table shows \ the \ breakdown \ by \ Regional \ Taxation \ Bureaus \ of \ ``Total'' \ of ``(1) \ Litigation \ cases \ (Government \ as \ defendant)''.$

(4) 国側原告事件の国税局別内訳

(単位:件)

Breakdown of litigation cases (Government as plaintiff) by Regional Taxation Bureaus

(Number of cases)

| | oundo min or | mergation | cases (cre |) v CI IIIII CII | as piaint | | ,ionai ran | atton Bar | outub | | | | | | | (Number | or oacce) |
|--------------------------------|-------------------|--|---|---|--------------------|-------------------------|------------|--|-----------|---------------------------------|--|-----------------------------|----------|----------------|--------|---------------|---|
| | 区 分 | 前年度 末係属 件 数 | 事件区 分の変 | 本年度提起件数 Number of cases filed for the current fiscal year | | | | 本年度終結件数 Number of cases processed for the current fiscal year | | | | | | | | | |
| | Type | | 更等の調 整件 数 | 第1審 | 控訴審 | 上告審 | Tull | 取下 件数 | 却下件数 | 国側 勝訴 件数 | 国側 一部 勝訴 件数 | 国側 敗訴 件数 | 差戻 件数 | 和解件数 | その他 | 11 | 本年度 末係属 件 数 |
| 国税局 Regional Taxa Bureau | ation | Number of pending cases at the end of the previous fiscal year | Number of arranged cases such as change of jurisdiction | The first instance | Trial of an appeal | Hearing of final appeal | Total | Withdrawal | Dismissal | Decision in favor of Government | Decision partially in favor of Government | Decision against Government | Remand | Reconciliation | Others | Total | Number of pending cases at the end of the current fiscal year |
| 札幌 | 晃 Sapporo | - | - | 5 | - | - | 5 | - | - | - | - | - | - | - | 5 | 5 | - |
| 仙 台 | Sendai | 1 | - | 4 | - | - | 4 | _ | - | 1 | - | - | - | - | 4 | 5 | - |
| 関東信越 | Kanto Shinetsu | 1 | - | 25 | - | - | 25 | 1 | - | 2 | - | - | - | - | 15 | 18 | 8 |
| 東京 | | 13 | - | 26 | 1 | - | 27 | 1 | - | 1 | - | - | - | - | 32 | 34 | 6 |
| 金 派 | ₹ Kanazawa | 3 | - | 4 | _ | - | 4 | 2 | - | - | - | - | - | - | 4 | 6 | 1 |
| 名 古 屋 | 己 Nagoya | 3 | - | 13 | 1 | 1 | 15 | - | - | 4 | - | - | - | 1 | 8 | 13 | 5 |
| 大 阪 | | 2 | - | 12 | - | - | 12 | - | - | 2 | 1 | - | - | - | 8 | 11 | 3 |
| 広 島 | Hiroshima | 2 | - | 4 | - | - | 4 | - | - | - | - | - | - | - | 5 | 5 | 1 |
| 高 松 | ∑ Takamatsu | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 福岡 | Fukuoka | 2 | - | 1 | 1 | - | 2 | 1 | - | 1 | 1 | - | - | - | - | 3 | 1 |
| 熊本 | Kumamoto | - | - | 3 | - | - | 3 | - | - | - | - | - | - | - | 3 | 3 | - |
| 沖 縄 | ■ Okinawa | - | - | 1 | - | - | 1 | - | - | - | - | - | - | - | 1 | 1 | - |
| 슴 討 | † Total | 27 | - | 98 | 3 | 1 | 102 | 5 | - | 11 | 2 | - | - | 1 | 85 | 104 | 25 |

⁽注)この表は、「(2)国側原告事件」の合計欄を国税局別に示したものである。

Note: This table shows the breakdown by Regional Taxation Bureaus of "Total" of "(2) Litigation cases (Government as plaintiff)".