Taxation of Digital Assets
Day 2 – Keynote

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Powered by Imani Partners on 13 June 2025

A few words about me

MOSAIK

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Multicultural

International Business and Tax Lawyer (2000)

CEDR-Accredited Mediator and Trainer (2005) [*Pro bono*]

Board Chair/Member (2004)

Human (1979)

Multilingual

Mother (2010)

C-Suite Executive (2005)

Expat on 3 continents (2004-2020)

Entrepreneur and Innovator (2009)

2026, Ph.D. in Regulation and Taxation of Digital Assets (Bourgogne, France)

2009, LL.M. in Islamic Law, Finance and Tax (SOAS, UK)

Regulatory Mediator (2010)

2009, LL.M. in International Law of Finance and Banking Law (Queen Mary, UK)

2000, Masters Degree in Business Law and Taxation (Panthéon-Assas, Paris, France)

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Imani Partners' activities (with a few examples)

Entrepreneurship

+ 3 other ventures

Board mandates

Advisory

Under stringent NDAs

Research, Teaching
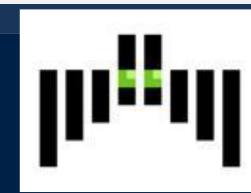
I Tokenised Tax.

Plug and Play?

What?

Security?

How?

Purpose?

Consent?

Decorrelate wealth and Taxpayer?

Can I Tokenise Tax?

Proof of Transaction?

Proof of Compliance?

Governments willingness?

Principles?

Industry buy-in?

Collector?

Added Value?

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I Tokenised Tax.

The Tokenised Micro Flat Tax (TMFT)
Embedding Justice in Code

"A civic protocol for programmable consent and fiscal dignity."

Why Tax Itself Needed Reinvention

Digital assets move without borders, agents, or declarations
Fiscal frameworks are siloed, slow, and retroactive

States face:
No audit trails
No real-time capture
No jurisdictional enforcement

The tax base is eroding and public services are suffering.

If code redefined finance, why not tax too?

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1. TMFT: A New Protocol for Contribution

TMFT = a programmable, tokenised, micro flat tax

Transaction-based: Applies at point of transaction (e.g. 0.2%)

Replaces or complements PIT, CIT, VAT in opt-in models

Solves three systemic problems: Under-collection, Overhead, Cross-border avoidance

The act of contribution is now rebuilt in the native language of digital assets.

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2. The Dual Proofs: PoTr + PoCo

Proof of Transaction (PoTr)
→ Validates: What, When, Value, and Chain

Proof of Compliance (PoCo)
→ Validates: Consent, Jurisdiction, Eligibility

Combined, they deliver:
    Legally routed taxation
    Transparent, revocable compliance
    Real-time, automated remittance to public wallets

Not surveillance. Not force. Just proof.

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3. Legal Compatibility, Sovereign by Design

Already compatible with:
    Draft clauses submitted to French Tax Code (Art. 150 ZQ)
    OECD Crypto-Asset Reporting Framework
    UN digital tax principles
    MiCA, GDPR, eIDAS

Jurisdictions configure: Rate + Asset scope + Exemptions + Wallet routing

Tokenising tax does not erase sovereignty. It operationalises it, in a modular manner.

4. Consent by Design: TMFT Is Civic, Not Coercive

PoCo requires:

Voluntary opt-in at asset or protocol level

Transparent thresholds (e.g. €200 de minimis)

Revocable permission and traceable audit

DAO-style governance optional

Complies with privacy and consent standards

A tax you can trace, verify and … walk away from.

Strategic Use Cases: From Retail to Sovereign

Retail/Commerce > NFTs, tipping, DeFi, micro-workflows

DAOs & Enterprises > Proof of fiscal presence, transfer pricing clarity, automated compliance

States > Immediate liquidity without debt + Reduced evasion and shadow flows + Redistributive equity through automation

Emerging Markets > Leapfrog to smart fiscal capacity with minimal bureaucracy

TMFT makes it easier to contribute than to evade > Fraud-resistant by design.

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This Is Not More Tax. This Is Better Tax.

One ultra-light touch tax across thousands of interactions

Designed to:
      Lower friction
      Raise legitimacy
      Avoid retroactive penalties

Makes digital value accountable without disincentivizing innovation

The fiscal infrastructure for a digital commons.

The Ethics of Embedding Contribution in Code

TMFT reflects a belief: "If you benefit, you contribute."

Ethically aligned with:
Libertarian voluntarism (no coercion)
Progressive redistribution (fair base)
Global commons logic (borderless application)

Code is law, yes. But code can also be justice.

Tax does not have to punish. It can protect.

Call to Action: Adopt, Adapt, Collaborate

Pilot-ready: EMEIA, DAO networks

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Seeking:
Public finance ministries
Wallet and chain integrators
Ethical DAOs, NGOs, and fiscal coalitions

Help me make tax feel like participation, not penalty.

Closing remarks: A Civic Code for the Digital Age

"Not a Tax on Freedom. A Contribution to Justice. Through Fiscal Dignity."

TMFT is more than infrastructure: it is an invitation to participate in public life, digitally.

This invention does not belong to any one country, chain, or ideology, even company.

It is a legal, fiscal, and ethical tool for a world that can no longer afford disconnection between value creation and collective care.

Let others call it the "Rajan Tax" if they choose. **I call it a civic architecture in code.**

One line of programmable logic, millions of acts of quiet solidarity.

I tokenised tax, not to control wealth, but to reconnect it to its civic purpose.

Izzat-Begum B. Rajan