

税務統計

—19-1～2 不服審査・訴訟事件関係—

(平成23年度)

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国税庁 長官官房 企画課

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統計表を見る方のために

利用上の注意

1 不服審査

この統計表は、平成23会計年度内における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。）による不服申立ての事績を①異議申立てと②審査請求とに分けて掲げたものである。

2 訴訟事件

この統計表は、平成23会計年度内における賦課又は徴収関係（徴収及び滞納処分）に関連して国、国税局長又は税務署長を当事者又は参加人とする訴訟の事績について①国側被告事件（賦課若しくは徴収関係）と②国側原告事件（徴収関係）に区分して掲げたものである。

19-1~2 Others

For the people who use the statistical tables

Notes on use

1 Administrative review

The statistical tables show the statistics of administrative protests filed under General Law of National Taxes and Administrative Appellate Law
(except for Law Concerning Access to Information Held by Administrative Organs) during FY2011. The cases are classified into ① request for reinvestigation, and ② request for reconsideration.

2 Litigation case

The statistical table shows the statistics of litigation cases related to taxation or collection-related matters (collection and procedure for collection of tax delinquency) during FY2011 which involved the government, Regional Commissioner, or Director of Taxation Office as a party concerned or an intervener. The cases are classified into ① the cases where the government is the defendant (taxation or collection-related matters), and ② the cases where the government is the plaintiff (collection-related matters).

The classification of plaintiff and defendant is based on the classification in the court of first instance.

概要

Outline

不服審査・訴訟事件

Administrative review/ Litigation case

(1) 平成23年度中の異議申立の発生件数は3,803件(前年度5,103件)で前年度に比べて1,300件(伸び率△25.5%)減少している。前年度から繰り越された1,386件を含む要処理件数5,189件のうち、処理済件数は4,511件で、このうち異議申立人の請求が一部又は全部認められた請求認容件数は375件(前年度476件)、割合は8.3%(前年度10.0%)となっている。(第1表参照)。

The number of the requests for reinvestigation in FY 2011 is 3,803 which is 1,300 less (rate of increase: △25.5 %) than the previous fiscal year (5,103). Out of 5,189 cases necessary to dispose including 1,386 cases carried over from the previous year, 4,511 cases are already disposed. From the viewpoint of disposition type, the number of cases where a part or all of claims of demurrers were accepted is 375 (for the previous fiscal year, 476), which accounts for 8.3 % (10.0 %) of all cases (see Table 1).

(第1表) 異議申立ての状況

Table1: Disposition of requests for reinvestigation

| 区分 Type | 申立て件数 Number of the requests for reinvestigation | 伸び率 Growth rate | 処理済件数 Number of already disposed | 請求認容件数 Number of claim accepted | 割合 Percentage | |
|---------------|--|--------------------|--|---------------------------------------|------------------|---|
| | | | | | 件 Case | % |
| 平成18年度 FY2006 | 4,301 | △ 4.4 | 4,027 | 411 | 10.2 | |
| 19 2007 | 4,690 | 9.0 | 4,956 | 555 | 11.2 | |
| 20 2008 | 5,359 | 14.3 | 5,313 | 468 | 8.8 | |
| 21 2009 | 4,795 | △ 10.5 | 4,997 | 591 | 11.8 | |
| 22 2010 | 5,103 | 6.4 | 4,746 | 476 | 10.0 | |
| 23 2011 | 3,803 | △ 25.5 | 4,511 | 375 | 8.3 | |

(2) 平成23年度中の審査請求の発生件数は3,581件(前年度3,084件)で前年度に比べて497件(伸び率16.1%)増加している。前年度から繰り越された2,194件を含む要処理件数5,775件のうち、処理済件数は2,967件で、このうち審査請求人の請求が一部又は全部認められた請求認容件数は404件(前年度479件)、割合は13.6%(同12.9%)となっている。(第2表参照)。

The number of the requests for reconsideration in FY 2011 is 3,581, which is 497 more (rate of increase: 16.1 %) than the previous year (3,084).

Out of 5,775 cases necessary to dispose including 2,194 cases carried over from the previous year, 2,967 cases are already disposed. From the viewpoint of disposition type, the number of cases where a part or all of claims of demurrers were accepted is 404 (for the previous year, 479), which accounts for 13.6 % (12.9 %) of all cases (see Table 2).

(第2表) 審査請求の状況

Table2: Disposition of requests for reconsideration

| 区分 Type | 審査請求件数 Number of requests for reconsideration | 伸び率 Growth rate | 処理済件数 Number of already disposed | 請求認容件数 Number of claim accepted | 割合 Percentage | |
|---------------|---|--------------------|--|---------------------------------------|------------------|---|
| | | | | | 件 Case | % |
| 平成18年度 FY2006 | 2,504 | △ 15.5 | 2,945 | 361 | 12.3 | |
| 19 2007 | 2,755 | 10.0 | 2,404 | 304 | 12.6 | |
| 20 2008 | 2,835 | 2.9 | 2,814 | 415 | 14.7 | |
| 21 2009 | 3,254 | 14.8 | 2,593 | 384 | 14.8 | |
| 22 2010 | 3,084 | △ 5.2 | 3,717 | 479 | 12.9 | |
| 23 2011 | 3,581 | 16.1 | 2,967 | 404 | 13.6 | |

(3) 平成23年度中に国側を被告とした訴訟の発生件数は391件(前年度350件)で、前年度に比べて41件(伸び率11.7%)増加している。訴訟が終結した件数は380件で、このうち原告が一部又は全部勝訴した原告勝訴件数は51件(前年度27件)、割合は13.4%(前年度7.6%)となっている。(第3表参照)。

The number of tax litigations brought against the government (as defendant) in FY 2011 was 391 (compared to 350 in the previous year), +41 year-on-year (+11.7 % year-on-year).

During the fiscal year, final court decisions were made on 380 cases, of which court decisions partly or fully in favor of plaintiffs were made in 51 cases (compared to 27 cases in the previous year), accounting for 13.4 % (up from 7.6 % in the previous year) of all cases (see Table 3).

(第3表) 国側を被告とした訴訟状況

Table3: Disposition of litigation cases (government as defendant)

| 区分 Type | 訴訟提起件数 Number of filed litigation cases | 伸び率 Growth rate | 訴訟終結件数 Number of finished litigation cases | 原告勝訴件数 Number of decisions in favor of plaintiffs | 割合 Percentage | |
|---------------|---|--------------------|---|--|------------------|---|
| | | | | | 件 Case | % |
| 平成18年度 FY2006 | 401 | 1.8 | 447 | 80 | 17.9 | |
| 19 2007 | 345 | △ 14.0 | 387 | 55 | 14.2 | |
| 20 2008 | 355 | 2.9 | 356 | 38 | 10.7 | |
| 21 2009 | 339 | △ 4.5 | 320 | 16 | 5.0 | |
| 22 2010 | 350 | 3.2 | 354 | 27 | 7.6 | |
| 23 2011 | 391 | 11.7 | 380 | 51 | 13.4 | |

19-1 不服審査
Administrative Review

(1) 異議申立て

Request for reinvestigation

| 区分 Type | 本年度要処理件数 Number of requests processed for the current fiscal year | | | | | | 本年度処理済件数 Number of requests processed for the current fiscal year | | | | | |
|--|--|--|---|--------------------|--------------------|---|--|---------------------------------|---------------------------------|---------------------------------|--|--|
| | 前年度未決 続起件数 Number of unsettled requests carried over from the previous fiscal year | 本年度に 申し立てた件数 Number of cases requested for the current fiscal year | | | 計 Total ① | みなす 審査請求 件数 Number of deemed requests for reconsideration | みなす 取下件数 Number of withdrawals | 取下件数 Number of dismissals | 却下件数 Number of rejections | 棄却件数 Number of rejections | 全部 取消件数 Number of whole annulments | |
| | | 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 | | | | | | | | |
| 平成18年度 FY2006 | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | |
| 19 2007 | 1,177 ² | 4,292 ¹ | 9 ² | 4,301 ⁴ | 5,478 ¹ | 170 ⁴ | 68 ¹ | 632 ¹ | 369 ³ | 2,377 ¹ | 69 ¹ | |
| 20 2008 | 1,185 ² | 5,355 ¹ | 5 ³ | 4,690 ⁴ | 6,141 ⁴ | 105 ⁴ | 54 ¹ | 732 ¹ | 539 ³ | 2,971 ¹ | 79 ¹ | |
| 21 2009 | 1,231 ³ | 4,783 ² | 12 ³ | 4,795 ³ | 6,026 ³ | 92 ³ | 53 ² | 1,187 ² | 477 ¹ | 3,038 ¹ | 68 ¹ | |
| 22 2010 | 1,029 ² | 5,093 ¹ | 10 ² | 5,103 ³ | 6,132 ³ | 60 ³ | 25 ² | 602 ² | 628 ¹ | 2,955 ¹ | 77 ¹ | |
| 23 2011 | 1,386 ¹ | 3,784 ¹ | 19 ¹ | 3,803 ¹ | 5,189 ¹ | 73 ¹ | 105 ¹ | 463 ¹ | 413 ¹ | 3,082 ¹ | 44 ¹ | |
| 申告 所得税 Self-assessment income tax | 342 ¹ | 968 ¹ | 15 ¹ | 983 ¹ | 1,325 ¹ | 22 ¹ | 24 ¹ | 126 ¹ | 99 ¹ | 852 ¹ | 11 ¹ | |
| 源泉 所得税 Withholding income tax | 41 ¹ | 79 ¹ | 1 ¹ | 80 ¹ | 121 ² | 2 ² | 2 ² | 15 ¹ | 9 ¹ | 52 ¹ | 2 ¹ | |
| 法人税 Corporation tax | 291 ¹ | 562 ¹ | - ¹ | 562 ¹ | 853 ¹ | - ¹ | 29 ¹ | 103 ¹ | 48 ¹ | 421 ¹ | - ¹ | |
| 相続税 Inheritance tax | 59 ¹ | 316 ¹ | - ¹ | 316 ¹ | 375 ¹ | 17 ¹ | - ¹ | 29 ¹ | 16 ¹ | 206 ¹ | 3 ¹ | |
| 贈与税 Gift tax | 12 ¹ | 82 ¹ | - ¹ | 82 ¹ | 94 ¹ | - ¹ | - ¹ | 10 ¹ | 16 ¹ | 56 ¹ | - ¹ | |
| 消費税 Consumption tax | 260 ¹ | 681 ¹ | 1 ¹ | 682 ¹ | 942 ¹ | 16 ¹ | 25 ¹ | 58 ¹ | 37 ¹ | 632 ¹ | 13 ¹ | |
| 有価証券 取引税 Securities transaction tax | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | |
| 酒税 Liquor tax | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | |
| 法人 特別税等 Temporary special corporation tax | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | - ¹ | |
| 地方 消費税 Local consumption tax | 260 ¹ | 680 ¹ | 1 ¹ | 681 ¹ | 941 ¹ | 16 ¹ | 25 ¹ | 58 ¹ | 38 ¹ | 630 ¹ | 13 ¹ | |
| その他 Others | 56 ¹ | 9 ¹ | - ¹ | 9 ¹ | 65 ¹ | - ¹ | - ¹ | - ¹ | - ¹ | 56 ¹ | - ¹ | |
| 小計 Subtotal | 1,321 ¹ | 3,377 ¹ | 18 ¹ | 3,395 ¹ | 4,716 ¹ | 73 ¹ | 105 ¹ | 399 ¹ | 263 ¹ | 2,905 ¹ | 42 ¹ | |
| 徴収関係 Related to collection | 65 ¹ | 407 ¹ | 1 ¹ | 408 ¹ | 473 ¹ | - ¹ | - ¹ | 64 ¹ | 150 ¹ | 177 ¹ | 2 ¹ | |
| 計 Total | 1,386 ¹ | 3,784 ¹ | 19 ¹ | 3,803 ¹ | 5,189 ¹ | 73 ¹ | 105 ¹ | 463 ¹ | 413 ¹ | 3,082 ¹ | 44 ¹ | |

(注) 内書は国税庁・国税不服審判所分の件数である。

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

| (単位:件) (Number of cases) | | | |
|--|----------------------------------|----------------|--|
| 本年度処理済件数 Number of requests processed for the current fiscal year | | | 本年度未決 繰越件数 Carried forward unsettled requests for the current fiscal year ①-② |
| 一部 取消件数 Number of partial annulments | 変更その他 Amendment and others | 計 Total | ② |
| 内 Including | 内 Including | 内 Including | 内 Including |
| 342 | - | 4,027 | 1,451 |
| 476 | - | 4,956 | 1,185 |
| 400 | 1 | 5,313 | 1,231 |
| 525 | - | 4,997 | 1,029 |
| 399 | - | 4,746 | 1,386 |
| 331 | - | 4,511 | 678 |
| | 1 | | |
| 88 | - | 1,222 | 103 |
| | 93 | | 28 |
| 11 | - | | |
| 39 | - | 640 | 213 |
| 75 | - | 346 | 29 |
| 8 | - | 90 | 4 |
| 51 | - | 832 | 110 |
| | - | - | - |
| 51 | - | 831 | 110 |
| 8 | - | 64 | 1 |
| | 1 | | |
| 331 | - | 4,118 | 598 |
| | - | 393 | 80 |
| 331 | - | 4,511 | 678 |

調査対象等： 平成23年4月1日から平成24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）に基づき「異議申立て」及び「審査請求」のなされたものを掲げた。

用語の説明： 1 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、これをしないことをいう。

2 みなす審査請求とは、国税局長又は税務署長等が異議申立てを審査請求として取扱うことを適当と認め、かつ、異議申立人がそれに同意したとき、あるいは更正決定等について未了請求がされている場合に、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異議申立て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。

3 みなす取下とは、異議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異議申立て及び審査請求がされた日以前に異議申立てに係る処分の全部を取り消す旨の異議決定書の原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。

4 取下とは、不服申立人が異議申立て又は審査請求を撤回したものという。

5 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と判定されたものをいう。

6 葵却とは、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つたものをいう。

7 取消又は変更とは、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。

Subject of survey, etc.: Requests for reinvestigation, 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 1,2011 and March 31, 2012.

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.

2 "Deemed requests for reconsideration" means requests for reinvestigation which were deemed requests for reconsideration. A request for reinvestigation 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 reinvestigation as a request for reconsideration and the person who filed the request for reinvestigation agreed with it, or when a request for reconsideration was filed against a correction or determination, etc., and in that situation a request for reinvestigation was filed against another correction or determination, etc. which was made about tax base, etc. related to the former correction or determination, etc..

3 "Deemed withdrawals" refers to requests for reinvestigation which were deemed to be withdrawn. A request for reinvestigation is deemed to be withdrawn when a request for reconsideration was filed without waiting for a decision on the request for reinvestigation. A request for reconsideration is also deemed to be withdrawn when an attested copy of decision on the request for reinvestigation which annuls wholly the procedures related to the request for reinvestigation, was issued previous to the date of filing of the request for reconsideration.

4 "Withdrawal" means withdrawal of a request for reinvestigation or a request for reconsideration by the person who filed an administrative protest.

5 "Dismissal" means that an administrative protest was judged as unqualified for consideration due to the lack of requirements for an administrative protest.

6 "Rejection" means that the original procedures are judged as legal or appropriate, and an administrative protest is not accepted.

7 "Annulment or amendment" means the decision which finds wholly or partially the original procedures illegal or unjust, and annuls the original procedures wholly or partially.

(2) 審査請求
Request for reconsideration

| 区分 Type | 本年度要処理件数 Number of requests to be processed for the current fiscal year | | | | | |
|---------------|--|---|---|---|-----------------|----------------|
| | 前年度 未決済件数 Number of unsettled requests carried over from the previous fiscal year | 本年度に請求した件数 Number of cases requested for the current fiscal year | | | 計 Total ① | |
| | | 処分に係るもの Those related to procedure | 不作為に係るもの Those related to nonfeasance | みなし 審査請求件数 Number of deemed requests for | | |
| 平成18年度 FY2006 | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including |
| 19 2007 | 2,235 | 2,334 | - | 170 | 2,504 | 4,739 |
| 20 2008 | 1,794 | 2,649 | 1 | 105 | 2,755 | 4,549 |
| 21 2009 | 2,145 | 2,746 | - | 89 | 2,835 | 4,980 |
| 22 2010 | 2,166 | 3,154 | 8 | 92 | 3,254 | 5,420 |
| 23 2011 | 1 | 2,827 | 3,024 | - | 60 | 3,084 |
| | 2,194 | 1 | 3,499 | 9 | 73 | 10 |
| 申告 所得税 | Self-assessment income tax | 456 | 784 | - | 22 | 806 |
| 源泉 所得税 | Withholding income tax | 31 | 46 | 9 | 2 | 57 |
| 法人税 | Corporation tax | 356 | 453 | - | - | 453 |
| 相続税 | Inheritance tax | 155 | 243 | - | 17 | 260 |
| 贈与税 | Gift tax | 22 | 47 | - | - | 47 |
| 消費税 | Consumption tax | 468 | 762 | - | 16 | 778 |
| 行徴証券 取引税 | Securities transaction tax | - | - | - | - | - |
| 地価税 | Land value tax | - | - | - | - | - |
| 酒税 | Liquor tax | - | 1 | - | 1 | 1 |
| 法人 特別税等 | Temporary special corporation tax | - | - | - | - | - |
| 地方 消費税 | Local consumption tax | 465 | 761 | - | 16 | 777 |
| その他 | Others | 7 | 99 | - | - | 99 |
| 小計 | Subtotal | 1,960 | 3,196 | 9 | 73 | 10 |
| 徴収関係 | Related to collection | 234 | 303 | - | - | 303 |
| 計 | Total | 2,194 | 1 | 3,499 | 9 | 73 |
| | | | | | 10 | 10 |
| | | | | | | 5,775 |

(注) 内書は国税局分の件数である。

Note: Figures preceded by "Including" are those for Regional Taxation Bureaus.

(単位：件)
(Number of cases)

| みなす 取下件数 Number of deemed withdrawals | 本年度処理済件数 Number of requests processed for the current fiscal year | | | | | | | 本年度未決済越 件数 Carried forward unsettled requests for the current fiscal year ①-② | 区分 Type |
|---|--|---------------------------------|---------------------------------|--|--|----------------------------------|-----------------|---|---|
| | 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 | | |
| 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including | 内 Including |
| - | 373 | 329 | 1,882 | 91 | 270 | - | 2,945 | 1,794 | 平成18年度 FY2006 |
| - | 224 | 284 | 1,592 | 91 | 212 | 1 | 2,404 | 2,145 | 19 2007 |
| - | 284 | 268 | 1,847 | 159 | 256 | -1 | 2,814 | 2,166 | 20 2008 |
| -1 | 285 | 304 | 1,620 | 143 | 241 | -10 | 2,593 | 2,827 | 21 2009 |
| - | 309 | 639 | 2,290 | 153 | 326 | -1 | 3,717 | 2,194 | 22 2010 |
| -9 | 284 | 285 | 1,994 | 119 | 285 | -9 | 2,967 | 2,808 | 23 2011 |
| - | 57 | 83 | 424 | 56 | 68 | - | 688 | 574 | 申告 所得税 Self assessment income tax |
| -9 | 11 | 4 | 26 | 7 | 5 | -9 | 53 | 35 | 源泉 所得税 Withholding income tax |
| - | 20 | 40 | 270 | 38 | 56 | - | 424 | 385 | 法人税 Corporation tax |
| - | 14 | 28 | 122 | 7 | 40 | - | 211 | 204 | 相続税 Inheritance tax |
| - | 4 | 5 | 28 | - | 6 | - | 43 | 26 | 贈与税 Gift tax |
| - | 47 | 20 | 435 | 5 | 53 | - | 560 | 686 | 消費税 Consumption tax |
| - | - | - | - | - | - | - | - | - | 有価証券取 引税 Securities transaction tax |
| - | - | - | - | - | - | - | - | - | 地価税 Land value tax |
| - | - | - | - | - | - | - | - | 1 | 酒 税 Liquor tax |
| - | - | - | - | - | - | - | - | - | 法人 特別税等 Temporary special corporation tax |
| - | 47 | 21 | 431 | 5 | 53 | - | 557 | 685 | 地方 消費税 Local consumption tax |
| - | - | 3 | 3 | 1 | 3 | - | 10 | 96 | その他 Others |
| -9 | 200 | 204 | 1,739 | 119 | 284 | -9 | 2,546 | 2,692 | 小計 Subtotal |
| - | 84 | 81 | 255 | - | 1 | - | 421 | 116 | 徴収関係 Related to collection |
| -9 | 284 | 285 | 1,994 | 119 | 285 | -9 | 2,967 | 2,808 | 計 Total |

(3) 国税局別の異議申立て

Request for reinvestigation by Regional Taxation Bureaus

| 区 分 Type | 前年度 未決済件数 Carried forward unsettled requests for the current last year | 本年度要処理件数 Number of requests to be processed for the current fiscal year | | | 計 Total ① | みなす 審査請求件数 Number of deemed requests for reconsideration | | |
|--|--|--|---|----------------|-----------------|--|--|--|
| | | 本年度申立て件数 Number of cases requested for the current 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 | | | | |
| 国 税 局 Regional Taxation Bureau | 札幌 Sapporo | 16 | 129 | - | 129 | 145 | | |
| | 仙台 Sendai | 39 | 92 | - | 92 | 131 | | |
| | 関東信越 Kanto Shinetsu | 138 | 509 | 15 | 524 | 662 | | |
| | 東京 Tokyo | 616 | 1,179 | 2 | 1,181 | 1,797 | | |
| | 金沢 Kanazawa | 2 | 34 | 1 | 35 | 37 | | |
| | 名古屋 Nagoya | 243 | 574 | 1 | 575 | 818 | | |
| | 大阪 Osaka | 168 | 592 | - | 592 | 760 | | |
| | 広島 Hiroshima | 40 | 256 | - | 256 | 296 | | |
| | 高松 Takamatsu | 10 | 121 | - | 121 | 131 | | |
| | 福岡 Fukuoka | 98 | 75 | - | 75 | 173 | | |
| 国 税 厅 National Tax Agency | 熊本 Kumamoto | 15 | 88 | - | 88 | 103 | | |
| | 沖縄 Okinawa | 1 | 134 | - | 134 | 135 | | |
| | 国税不服審判所 National Tax Tribunal | - | 1 | - | 1 | - | | |
| 計 Total | | 1,386 | 3,784 | 19 | 3,803 | 5,189 | | |
| (注) この表は、「(1)異議申立て」の合計欄を国税局別に示したものである。 Note: This table shows the breakdown of "Total" of "(1) Request for reinvestigation" by Regional Taxation Bureaus. | | | | | | | | |

(4) 国税不服審判所支部別の審査請求

Request for reconsideration by branches of National Tax Tribunal

| 区 分 Type | 前年度 未決済件数 Carried forward unsettled requests for the current last year | 本年度要処理件数 Number of requests to be processed for the current fiscal year | | | | 計 Total ① | |
|---|--|--|---|--|----------------|-----------------|--|
| | | 本年度に請求した件数 Number of cases requested for the current 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 Subtotal | | |
| 国 税 不 服 審 判 所 支 部 Branch of National Tax Tribunal | 札幌 Sapporo | 35 | 70 | - | - | 70 | |
| | 仙台 Sendai | 163 | 84 | - | - | 84 | |
| | 関東信越 Kanto Shinetsu | 254 | 297 | - | 6 | 303 | |
| | 東京 Tokyo | 858 | 1,692 | - | 31 | 1,723 | |
| | 金沢 Kanazawa | 51 | 24 | - | - | 24 | |
| | 名古屋 Nagoya | 302 | 468 | - | 4 | 472 | |
| | 大阪 Osaka | 249 | 377 | - | 32 | 409 | |
| | 広島 Hiroshima | 98 | 248 | - | - | 248 | |
| | 高松 Takamatsu | 39 | 52 | - | - | 52 | |
| | 福岡 Fukuoka | 82 | 89 | - | - | 89 | |
| 国 税 局 Regional Taxation Bureau | 熊本 Kumamoto | 27 | 46 | - | - | 46 | |
| | 沖縄 Okinawa | 36 | 51 | - | - | 51 | |
| | 計 Total | 2,194 | 3,499 | 9 | 73 | 3,581 | |
| (注) 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。 Note: This table shows the breakdown of "Total" of "(2) Request for reconsideration" by branches of National Tax Tribunal. | | | | | | | |

(単位：件)
(Number of cases)

| 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 | 本年度 未決済件数 Carried forward unsettled requests for the current fiscal year ①-② |
|--|----------------------------------|---------------------------------|---------------------------------|---|---|--------------------------------------|-----------------|--|
| | | | | | | | | 本年度 未決済件数 Carried forward unsettled requests for the current fiscal year ①-② |
| - | 13 | 10 | 87 | 6 | 4 | - | 120 | 25 |
| - | 7 | 14 | 88 | - | 21 | - | 130 | 1 |
| 22 | 90 | 61 | 374 | 9 | 48 | - | 610 | 52 |
| 36 | 167 | 170 | 943 | 17 | 137 | - | 1,501 | 296 |
| - | 1 | 13 | 11 | - | - | - | 25 | 12 |
| 4 | 52 | 43 | 568 | 7 | 46 | - | 724 | 94 |
| 10 | 54 | 23 | 506 | 2 | 37 | - | 664 | 96 |
| - | 23 | 32 | 226 | - | 5 | - | 286 | 10 |
| 7 | 8 | 10 | 89 | - | 13 | - | 127 | 4 |
| 20 | 26 | 4 | 55 | - | 7 | - | 112 | 61 |
| - | 18 | 2 | 53 | 3 | 2 | - | 78 | 25 |
| 6 | 4 | 31 | 81 | - | 11 | - | 133 | 2 |
| - | - | - | 1 | - | - | - | 1 | - |
| - | - | - | - | - | - | - | - | - |
| 105 | 463 | 413 | 3,082 | 44 | 331 | - | 4,511 | 678 |

(単位：件)
(Number of cases)

| 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 | 本年度 未決済件数 Carried forward unsettled requests for the current fiscal year ①-② |
|--|----------------------------------|---------------------------------|---------------------------------|---|---|--------------------------------------|-----------------|--|
| | | | | | | | | 本年度 未決済件数 Carried forward unsettled requests for the current fiscal year ①-② |
| - | 8 | 2 | 26 | - | 11 | - | 47 | 58 |
| - | 5 | 4 | 105 | 13 | 20 | - | 147 | 100 |
| - | 26 | 27 | 258 | 7 | 35 | - | 353 | 204 |
| - | 98 | 99 | 860 | 15 | 64 | - | 1,136 | 1,445 |
| - | 1 | 32 | 33 | - | - | - | 66 | 9 |
| - | 86 | 49 | 323 | 42 | 25 | - | 525 | 249 |
| - | 9 | 12 | 160 | 31 | 86 | - | 298 | 360 |
| - | 38 | 26 | 50 | - | 14 | - | 128 | 218 |
| - | - | 11 | 36 | 4 | 7 | - | 58 | 33 |
| - | 1 | 18 | 75 | 5 | 14 | - | 113 | 58 |
| - | 2 | 3 | 34 | 2 | 8 | - | 49 | 24 |
| - | 1 | 2 | 34 | - | 1 | - | 38 | 49 |
| - | 9 | - | - | - | - | - | 9 | 1 |
| - | 284 | 285 | 1,994 | 119 | 285 | - | 2,967 | 2,808 |

19-2 訴訟事件
Litigation Cases

(1) 国側被告事件

Litigation cases (Government as defendant)

(単位: 件)

(Number of cases)

| 区分 Type | 前年度 未係属 件数 Number of pending cases at the end of the previous fiscal year | 事件区 分の変 更等の 調 整 件 数 Number of arranged cases such as change of jurisdiction | 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 未係属 件数 Number of pending cases at the end of the current fiscal year | |
|--|---|--|--|--|-------------------------------|---|--|---|----------------------------|------------------------------------|----------------------------|---------------------------|--|-----|
| | | | | 取 下 件 数 Withdrawal | 却 下 件 数 Dismissal | 国 勝 件 数 Decision in favor of Government | 側 訴 件 数 Decision partially in favor of Government | 国 側 一 部 勝 訴 件 数 Decision against Government | 側 敗 件 数 Remand | 差 戻 件 数 Reconciliation | 和 解 件 数 Others | 其 他 件 数 Total | | |
| (第一審) The first instance | | | | | | | | | | | | | | |
| 課 税 関 係 Cases related to taxation | 所得税 *1 | 116 | - | 64 | 2 | 2 | 53 | 12 | 25 | - | - | - | 94 | 86 |
| | 法人税 *2 | 65 | - | 49 | 2 | 2 | 24 | 1 | 1 | - | - | 1 | 31 | 83 |
| | 資産税 *3 | 36 | - | 29 | - | 1 | 27 | 3 | 2 | - | - | - | 33 | 32 |
| | 消費税 *4 | 10 | - | 9 | - | - | 7 | 1 | - | - | - | - | 8 | 11 |
| | 酒税 *5 | 1 | - | - | - | - | - | - | - | - | - | - | - | 1 |
| | 他の間接税 *6 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| | その他 *7 | 14 | 1 | 10 | 2 | - | 12 | - | - | - | - | - | 14 | 11 |
| | 計 *8 | 242 | 1 | 161 | 6 | 5 | 123 | 17 | 28 | - | - | 1 | 180 | 224 |
| | 行政事件 *9 | 16 | - | 28 | 3 | - | 10 | - | - | - | - | - | 13 | 31 |
| | 執行停止 *10 | - | - | 4 | 1 | 1 | - | 1 | - | - | - | - | 3 | 1 |
| 徵 収 関 係 Cases related to collection | 損害賠償 *11 | 4 | - | 3 | - | - | 3 | 1 | - | - | - | - | 4 | 3 |
| | その他民事 *12 | 13 | - | 12 | 10 | - | 8 | - | 1 | - | - | - | 19 | 6 |
| | 非訟事件等 *13 | 1 | - | 2 | - | 1 | 1 | - | - | - | - | - | 2 | 1 |
| | 計 *8 | 34 | - | 49 | 14 | 2 | 22 | 2 | 1 | - | - | - | 41 | 42 |
| | 審判所関係 *14 | 3 | - | 3 | - | 2 | 2 | - | - | - | - | - | 4 | 2 |
| | 合 計 *15 | 279 | 1 | 213 | 20 | 9 | 147 | 19 | 29 | - | - | 1 | 225 | 268 |
| (控訴審) Trial of an appeal | | | | | | | | | | | | | | |
| 課 税 関 係 Cases related to taxation | 所得税 *1 | 22 | - | 47 | - | - | 44 | 1 | 1 | - | - | - | 46 | 23 |
| | 法人税 *2 | 10 | - | 21 | - | - | 15 | - | - | - | - | - | 15 | 16 |
| | 資産税 *3 | 2 | - | 17 | - | - | 9 | - | - | - | - | - | 9 | 10 |
| | 消費税 *4 | - | - | 4 | 1 | - | 2 | - | 1 | - | - | - | 4 | - |
| | 酒税 *5 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| | 他の間接税 *6 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| | その他 *7 | 1 | - | 6 | - | - | 4 | - | - | - | - | - | 4 | 3 |
| | 計 *8 | 35 | - | 95 | 1 | - | 74 | 1 | 2 | - | - | - | 78 | 52 |
| | 行政事件 *9 | 4 | - | 10 | 1 | - | 10 | - | - | - | - | - | 11 | 3 |
| | 執行停止 *10 | - | - | 1 | - | 1 | - | - | - | - | - | - | 1 | - |
| 徵 収 関 係 Cases related to collection | 損害賠償 *11 | 1 | - | 4 | - | - | 3 | - | - | - | - | - | 3 | 2 |
| | その他民事 *12 | 1 | - | 1 | - | - | 2 | - | - | - | - | - | 2 | - |
| | 非訟事件等 *13 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| | 計 *8 | 6 | - | 16 | 1 | 1 | 15 | - | - | - | - | - | 17 | 5 |
| | 審判所関係 *14 | - | - | 2 | - | - | 2 | - | - | - | - | - | 2 | - |
| | 合 計 *15 | 41 | - | 113 | 2 | 1 | 91 | 1 | 2 | - | - | - | 97 | 57 |

調査対象等：平成23年4月1日から平成24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。

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。

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。

1 Income tax

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 Simplified litigations

14 Cases related to Tribunal

15 Total

16 Grandtotal

(単位：件)

(Number of cases)

| 区分 Type | 前年度 末係属 件数 Number of pending cases at the end of the previous fiscal year | 事件区 分の変 更等の 調整 件数 Number of arranged cases such as change of jurisdiction | 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 末係属 件数 Number of pending cases at the end of the current fiscal year | |
|--|---|--|--|--|--------------------------------------|--|--|---|--|--------------------------------------|--------------------------------------|--|---|
| | | | | 取 下 数 Withdrawal | 却 件 数 Dismissal | 国 側 訴 件 数 Decision in favor of Government | 国側一 部勝訴 件数 Decision partially in favor of Government | 国敗 件 数 Decision against Government | 差 件 数 Remand | 解 件 数 Reconciliation | 其 他 件 数 Others | 計 Total | |
| (上告審) Hearing of final appeal | | | | | | | | | | | | | |
| 課 稅 関 係 Cases related to taxation | 所得税 *1 法人税 *2 資産税 *3 消費税 *4 酒税 *5 他の間接税 *6 その他 *7 計 *8 | 21 15 4 — — — 4 44 | — — — — — — — — | 33 14 6 — — — 3 56 | — — — — — — 1 1 | 4 — — — — — 1 5 | 21 14 6 — — — 3 44 | — — — — — — — — | — — — — — — 2 2 | — — — — — — — — | — — — — — — 5 1 | 27 15 6 — — — 5 53 | 27 14 4 — — — 2 47 |
| 徵 収 関 係 Cases related to collection | 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 *8 審判所関係 *14 合 計 *15 | 3 — 1 1 — 5 | — — — — — 8 | 5 — 2 1 — — | — — — — — — | — — — — — 5 | 4 — 1 — — — | — — — — — — | — — — — — — | — — — — — — | — — 1 — — 5 | 4 — 2 2 — 8 | 4 — 2 2 — 8 |
| (審級別合計) Total of cases at each order of judgements | | | | | | | | | | | | | |
| 課 稅 関 係 Cases related to taxation | 所得税 *1 法人税 *2 資産税 *3 消費税 *4 酒税 *5 他の間接税 *6 その他 *7 計 *8 | 159 90 42 10 1 — 19 321 | — — — — — — 1 1 | 144 84 52 13 — — 19 312 | 2 2 — 1 — — 3 8 | 6 2 1 — — — 1 10 | 118 53 42 9 — — 19 241 | 13 1 3 1 1 — — 18 | 26 1 2 1 1 — — 30 | 2 — — — — — — 2 | — — — — — — — 2 | 167 61 48 12 — — 23 311 | 136 113 46 11 — — 16 323 |
| 徵 収 関 係 Cases related to collection | 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 *8 審判所関係 *14 合 計 *16 | 23 — 6 15 1 45 3 369 | — — — — — 73 — 1 | 43 5 9 14 2 5 | 4 1 — 10 — 15 | — 2 — — 1 2 | 24 — 7 10 1 4 | — 1 1 — — — | — — — 1 2 — | — — — — — — | 28 4 8 21 2 63 6 | 38 1 7 8 1 55 2 | |
| | | | | | | | | | | | | | |

Subject of survey, etc.:The tables show the statistics of litigation cases related to taxation or collection of national tax from April 1, 2011 to March 31, 2012.

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)

(Number of cases)

| 区分 Type | 前年度 未係属 件数 Number of pending cases at the end of the previous fiscal year | 事件区 分の変 更等の 調整 件数 Number of arranged cases such as change of jurisdiction | 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 未係属 件数 Number of pending cases at the end of the current fiscal year | |
|---|---|--|---|--|-------------------------------|--|--|---|----------------------------|------------------------------------|-------------------|--|----|
| | | | | 取 下 件 数 Withdrawal | 却 下 件 数 Dismissal | 国 側 訴 件 数 Decision in favor of Government | 国 側 勝 訴 件 数 Decision partially in favor of Government | 国 側 敗 訴 件 数 Decision against Government | 差 戻 件 数 Remand | 和 解 件 数 Reconciliation | その 他 Others | | |
| (第一審) The first instance Noncontentious cases | | | | | | | | | | | | | |
| 詐 害 行 為 *1 | 5 | - | 2 | - | - | 4 | - | - | - | 1 | - | 5 | 2 |
| 名 義 変 更 *2 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 債 権 取 立 *3 | 11 | - | 16 | 5 | - | 13 | - | - | - | - | 1 | 19 | 8 |
| そ の 他 民 事 *4 | 5 | - | 4 | - | - | 5 | - | - | - | - | - | 5 | 4 |
| 非 詐 害 事 件 等 *5 | - | - | 3 | 1 | - | - | - | - | - | - | 2 | 3 | - |
| 非 詐 害 事 件 等 *6 | 1 | - | 7 | 1 | - | 4 | - | - | - | - | 3 | 8 | - |
| 強 制 執 行 *7 | 4 | - | 45 | 2 | - | 1 | - | - | - | - | 19 | 22 | 27 |
| そ の 他 *8 | 45 | - | 86 | 1 | - | 1 | - | - | - | - | 104 | 106 | 25 |
| 計 Subtotal | 71 | - | 163 | 10 | - | 28 | - | - | - | 1 | 129 | 168 | 66 |
| (控訴審) Trial of an appeal Noncontentious cases | | | | | | | | | | | | | |
| 詐 害 行 為 *1 | 3 | - | 3 | - | - | 5 | - | - | - | - | - | 5 | 1 |
| 名 義 変 更 *2 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 債 権 取 立 *3 | 3 | - | 1 | 3 | - | 1 | - | - | - | - | - | 4 | - |
| そ の 他 民 事 *4 | - | - | 1 | - | - | 1 | - | - | - | - | - | 1 | - |
| 非 詐 害 事 件 等 *5 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 非 詐 害 事 件 等 *6 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 強 制 執 行 *7 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| そ の 他 *8 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 計 Subtotal | 6 | - | 5 | 3 | - | 7 | - | - | - | - | - | 10 | 1 |
| (上告審) Hearing of final appeal Noncontentious cases | | | | | | | | | | | | | |
| 詐 害 行 為 *1 | - | - | 1 | - | - | - | - | - | - | - | - | - | 1 |
| 名 義 変 更 *2 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 債 権 取 立 *3 | 3 | - | - | - | - | 3 | - | - | - | - | - | 3 | - |
| そ の 他 民 事 *4 | - | - | 1 | - | - | - | - | - | - | - | - | 1 | - |
| 非 詐 害 事 件 等 *5 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 非 詐 害 事 件 等 *6 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 強 制 執 行 *7 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| そ の 他 *8 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 計 Subtotal | 3 | - | 2 | - | - | 3 | - | - | - | - | - | 3 | 2 |
| Total (審級別合計) at each order of judgments Noncontentious cases | | | | | | | | | | | | | |
| 詐 害 行 為 *1 | 8 | - | 6 | - | - | 9 | - | - | - | 1 | - | 10 | 4 |
| 名 義 変 更 *2 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 債 権 取 立 *3 | 17 | - | 17 | 8 | - | 17 | - | - | - | - | 1 | 26 | 8 |
| そ の 他 民 事 *4 | 5 | - | 6 | - | - | 6 | - | - | - | - | - | 6 | 5 |
| 非 詐 害 事 件 等 *5 | - | - | 3 | 1 | - | - | - | - | - | - | 2 | 3 | - |
| 非 詐 害 事 件 等 *6 | 1 | - | 7 | 1 | - | 4 | - | - | - | - | 3 | 8 | - |
| 強 制 執 行 *7 | 4 | - | 45 | 2 | - | 1 | - | - | - | - | 19 | 22 | 27 |
| そ の 他 *8 | 45 | - | 86 | 1 | - | 1 | - | - | - | - | 104 | 106 | 25 |
| 計 Total | 80 | - | 170 | 13 | - | 38 | - | - | - | 1 | 129 | 181 | 69 |

調査対象等：平成23年4月1日から平成24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, 2011 to March 31, 2012.

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 Regional Taxation Bureaus

| 区分 Type | 前年度 末係属 件数 Number of pending cases at the end of the previous fiscal year | 事件区 分の変 更等の 調 件 整 数 Number of arranged cases such as change of jurisdiction | 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 度未 係属 件数 Number of pending cases at the end of the current fiscal year | | | | |
|--|--|---|---|---------------------------|--------------------------------|------------|--|-----------------------|--|--|---|--------------------|--|----------|------------|------------|------------|
| | | | 第1審 The first instance | 控訴審 Trial of an appeal | 上告審 Hearing of final appeal | 計 Total | 取下 件数 Withdrawal | 却下 件数 Dismissal | 国側 勝訴 件数 Decision in favor of Government | 国側 一部 勝訴 件数 Decision partially in favor of Government | 国側 敗訴 件数 Decision against Government | 差戻 件数 Remand | 和解 件数 Reconciliation | | | | |
| (課 税 関 係) Cases related to taxation | | | | | | | | | | | | | | | | | |
| 札幌 | Sapporo | 7 | - | - | 12 | 5 | 1 | 18 | - | 1 | 5 | 2 | - | - | 8 | 17 | |
| 仙台 | Sendai | 12 | - | - | 2 | 1 | 2 | 5 | - | - | 7 | - | 1 | - | 8 | 9 | |
| 関東信越 | Kanto Shinetsu | 42 | - | - | 24 | 6 | 9 | 39 | 1 | 1 | 35 | - | - | - | 37 | 44 | |
| 東京 | Tokyo | 115 | - | - | 61 | 31 | 16 | 108 | 2 | 3 | 70 | 10 | 19 | - | 1 | 105 | 118 |
| 金沢 | Kanazawa | 1 | - | - | 4 | - | - | 4 | - | - | 1 | - | - | - | 1 | 4 | |
| 名古屋 | Nagoya | 32 | 1 | - | 15 | 15 | 8 | 38 | 1 | - | 36 | - | 6 | - | 43 | 28 | |
| 大阪 | Osaka | 57 | - | - | 19 | 19 | 7 | 45 | 2 | 2 | 49 | 1 | 2 | - | 1 | 57 | 45 |
| 広島 | Hiroshima | 22 | - | - | 6 | 5 | 5 | 16 | - | - | 12 | 2 | 1 | - | 15 | 23 | |
| 高松 | Takamatsu | 8 | - | - | 9 | - | 1 | 10 | - | - | 6 | - | - | - | 6 | 12 | |
| 福岡 | Fukuoka | 15 | - | - | 3 | 6 | 4 | 13 | - | 3 | 9 | 2 | - | - | 16 | 12 | |
| 熊本 | Kumamoto | 9 | - | - | 4 | 7 | 2 | 13 | 2 | - | 9 | 1 | 1 | - | 13 | 9 | |
| 沖縄 | Okinawa | 1 | - | - | 2 | - | 1 | 3 | - | - | 2 | - | - | - | 2 | 2 | |
| 計 | Subtotal | 321 | 1 | 161 | 95 | 56 | 312 | 8 | 10 | 241 | 18 | 30 | 2 | 2 | 311 | 323 | |
| (徵 収 関 係) Cases related to collection | | | | | | | | | | | | | | | - | - | |
| 札幌 | Sapporo | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 仙台 | Sendai | 1 | - | - | - | - | - | - | - | - | - | - | - | - | - | 1 | |
| 関東信越 | Kanto Shinetsu | 6 | - | - | 8 | 2 | - | 10 | 5 | - | 7 | - | - | - | - | 12 | 4 |
| 東京 | Tokyo | 15 | - | - | 26 | 5 | 2 | 33 | 3 | - | 14 | 1 | - | - | - | 18 | 30 |
| 金沢 | Kanazawa | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 名古屋 | Nagoya | 8 | - | - | 3 | 1 | 2 | 6 | 1 | - | 5 | - | - | - | - | 6 | 8 |
| 大阪 | Osaka | 9 | - | - | 4 | 6 | 3 | 13 | 3 | 3 | 7 | 1 | 1 | - | - | 15 | 7 |
| 広島 | Hiroshima | 3 | - | - | 1 | - | - | 1 | 2 | - | 2 | - | - | - | - | 4 | - |
| 高松 | Takamatsu | 1 | - | - | - | - | - | - | - | - | 1 | - | - | - | - | 1 | - |
| 福岡 | Fukuoka | - | - | - | 2 | - | - | 2 | - | - | - | - | - | - | - | 2 | - |
| 熊本 | Kumamoto | 1 | - | - | 3 | 1 | 1 | 5 | 1 | - | 3 | - | - | - | - | 4 | 2 |
| 沖縄 | Okinawa | 1 | - | - | 2 | 1 | - | 3 | - | - | 3 | - | - | - | - | 3 | 1 |
| 計 | Subtotal | 45 | - | 49 | 16 | 8 | 73 | 15 | 3 | 42 | 2 | 1 | - | - | 63 | 55 | |
| 審判所分 | National Tax Tribunal | 3 | - | - | 3 | 2 | - | 5 | - | 2 | 4 | - | - | - | - | 6 | 2 |
| 合 計 | Total | 369 | 1 | 213 | 113 | 64 | 390 | 23 | 15 | 287 | 20 | 31 | 2 | - | 2 | 380 | 380 |

(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。

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)

(Number of cases)

| 区分 Type | 前年度 末係属 件数 Number of pending cases at the end of the previous fiscal year | 事件区 分の変 更等の 調整 件数 Number of arranged cases such as change of jurisdiction | 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 度末 係属 件数 Number of pending cases at the end of the current fiscal year | | |
|---------------------------------|--|---|---|---------------------------|--------------------------------|------------|--|-----------------------|--|---|--------------------|----------------------------|-------------------|--|-----|----|
| | | | 第1審 Trial of first instance | 控訴審 Trial of an appeal | 上告審 Hearing of final appeal | 計 Total | 取下数 Withdrawal | 却下 件数 Dismissal | 国側 一部勝訴 件数 Decision in favor of Government | 国側 一部敗訴 件数 Decision against Government | 差戻 件数 Remand | 和解 件数 Reconciliation | その 他 Others | | | |
| 国税局 Regional Taxation Bureau | | | | | | | | | | | | | | | | |
| 札幌 Sapporo | 12 | - | 15 | 1 | - | 16 | 4 | - | 7 | - | - | - | 9 | 20 | 8 | |
| 仙台 Sendai | 6 | - | 11 | - | 1 | 12 | - | - | 2 | - | - | 1 | 9 | 12 | 6 | |
| 関東信越 Kanto Shinetsu | 12 | - | 11 | 1 | - | 12 | - | - | 5 | - | - | - | 15 | 20 | 4 | |
| 東京 Tokyo | 24 | - | 38 | 1 | - | 39 | 2 | - | 6 | - | - | - | 47 | 55 | 8 | |
| 金沢 Kanazawa | 2 | - | 2 | - | - | 2 | - | - | 2 | - | - | - | - | - | 2 | |
| 名古屋 Nagoya | 10 | - | 18 | - | - | 18 | 1 | - | 4 | - | - | - | 16 | 21 | 7 | |
| 大阪 Osaka | 4 | - | 22 | 1 | 1 | 24 | 2 | - | 2 | - | - | - | 18 | 22 | 6 | |
| 広島 Hiroshima | 2 | - | 5 | - | - | 5 | - | - | 4 | - | - | - | 3 | 7 | - | |
| 高松 Takamatsu | 5 | - | 27 | - | - | 27 | 1 | - | 1 | - | - | - | 4 | 6 | 26 | |
| 福岡 Fukuoka | 2 | - | 6 | 1 | - | 7 | 1 | - | 2 | - | - | - | 4 | 7 | 2 | |
| 熊本 Kumamoto | 1 | - | 4 | - | - | 4 | 2 | - | 1 | - | - | - | 2 | 5 | - | |
| 沖縄 Okinawa | - | - | 4 | - | - | 4 | - | - | 2 | - | - | - | 2 | 4 | - | |
| 合計 Total | 80 | - | 163 | 5 | 2 | 170 | 13 | - | 38 | - | - | - | 1 | 129 | 181 | 69 |

(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。

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