

## Actifs numériques et information en matière fiscale : de l'utopie cypherpunk à la dystopie orwellienne ?

Initialement conçus pour répliquer en ligne les propriétés et garanties d'anonymat de la monnaie fiduciaire, les actifs numériques ont connu un développement important ces dernières années. La démocratisation de ces nouveaux actifs, et leurs caractéristiques inhérentes, soulèvent des défis considérables pour les États en matière de lutte contre la fraude fiscale. Si les outils juridiques actuels ne permettent pas aux administrations fiscales d'exercer efficacement leurs missions de contrôle, la coopération entre États et les expérimentations s'intensifient afin d'établir un cadre de transparence en matière de cryptoactifs robuste et de doter les administrations d'outils de ciblage efficaces.

« Le respect de la vie privée dans une société libre implique l'existence de systèmes de transaction anonymes »<sup>(1)</sup>. C'est l'un des postulats du mouvement cypherpunk dont la vocation, présentée dans les manifestes publiés par Timothy C. May<sup>(2)</sup> en 1988 et Eric Hughes en 1993<sup>(3)</sup>, est de se saisir des outils cryptographiques pour tenter de protéger la vie privée dans un contexte numérique.

Ce postulat a donné naissance, plusieurs décennies plus tard, au protocole informatique Bitcoin revendiquant la qualité de système de paiement et dont l'objet est de

permettre, en lieu et place de la monnaie fiduciaire censée se raréfier, la réalisation de transactions n'impliquant pas de révéler son identité.

Depuis cette date, les cryptoactifs<sup>(4)</sup> ont connu un essor impressionnant : près d'un

(4) Les cryptoactifs recouvrent un nombre extrêmement varié d'applications : ils peuvent constituer de simples unités de compte servant comme moyen de paiement ; mais aussi représenter toutes sortes de droits (livraison d'un bien, fourniture d'un service, accès à une plateforme, droit au bénéfice d'un revenu, droit de vote, etc.) ou de fichiers numériques lorsqu'ils ne sont pas fongibles (pour une définition des jetons non fongibles (JNF), ou non fungible tokens (NFT) en anglais, v. C. Zerbit, W. O'Rourke, NFT : chaînon manquant ou maillon faible de l'art numérique ?, Propriété industrielle, n° 5, mai 2021, étude 11).



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ORWL Avocats



Clément HERR  
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(1) E. Hughes, A Cypherpunk's Manifesto, 9 mars 1993, traduction libre.

(2) T. C. May, The Crypto Anarchist Manifesto, 1988.

(3) E. Hughes, A Cypherpunk's Manifesto, précité.

# Lutopie Analyse Complegravete De Loeliguvre

**Brendan G. Carr**



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## **Table of Contents Lutopie Analyse Complegravete De Loeliguvre**

1. Understanding the eBook Lutopie Analyse Complegravete De Loeliguvre
  - The Rise of Digital Reading Lutopie Analyse Complegravete De Loeliguvre
  - Advantages of eBooks Over Traditional Books
2. Identifying Lutopie Analyse Complegravete De Loeliguvre
  - Exploring Different Genres
  - Considering Fiction vs. Non-Fiction
  - Determining Your Reading Goals
3. Choosing the Right eBook Platform
  - Popular eBook Platforms
  - Features to Look for in an Lutopie Analyse Complegravete De Loeliguvre
  - User-Friendly Interface
4. Exploring eBook Recommendations from Lutopie Analyse Complegravete De Loeliguvre
  - Personalized Recommendations
  - Lutopie Analyse Complegravete De Loeliguvre User Reviews and Ratings
  - Lutopie Analyse Complegravete De Loeliguvre and Bestseller Lists
5. Accessing Lutopie Analyse Complegravete De Loeliguvre Free and Paid eBooks
  - Lutopie Analyse Complegravete De Loeliguvre Public Domain eBooks
  - Lutopie Analyse Complegravete De Loeliguvre eBook Subscription Services
  - Lutopie Analyse Complegravete De Loeliguvre Budget-Friendly Options
6. Navigating Lutopie Analyse Complegravete De Loeliguvre eBook Formats

- ePub, PDF, MOBI, and More
- Lutopie Analyse Complegravete De Loeliguvre Compatibility with Devices
- Lutopie Analyse Complegravete De Loeliguvre Enhanced eBook Features
- 7. Enhancing Your Reading Experience
  - Adjustable Fonts and Text Sizes of Lutopie Analyse Complegravete De Loeliguvre
  - Highlighting and Note-Taking Lutopie Analyse Complegravete De Loeliguvre
  - Interactive Elements Lutopie Analyse Complegravete De Loeliguvre
- 8. Staying Engaged with Lutopie Analyse Complegravete De Loeliguvre
  - Joining Online Reading Communities
  - Participating in Virtual Book Clubs
  - Following Authors and Publishers Lutopie Analyse Complegravete De Loeliguvre
- 9. Balancing eBooks and Physical Books Lutopie Analyse Complegravete De Loeliguvre
  - Benefits of a Digital Library
  - Creating a Diverse Reading Collection Lutopie Analyse Complegravete De Loeliguvre
- 10. Overcoming Reading Challenges
  - Dealing with Digital Eye Strain
  - Minimizing Distractions
  - Managing Screen Time
- 11. Cultivating a Reading Routine Lutopie Analyse Complegravete De Loeliguvre
  - Setting Reading Goals Lutopie Analyse Complegravete De Loeliguvre
  - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Lutopie Analyse Complegravete De Loeliguvre
  - Fact-Checking eBook Content of Lutopie Analyse Complegravete De Loeliguvre
  - Distinguishing Credible Sources
- 13. Promoting Lifelong Learning
  - Utilizing eBooks for Skill Development
  - Exploring Educational eBooks
- 14. Embracing eBook Trends
  - Integration of Multimedia Elements
  - Interactive and Gamified eBooks

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