

# Chapter 171

## Ghost companies in Mexico



<https://doi.org/10.56238/devopinterscie-171>

### **J. Isabel García Requenes**

Doctorate in Teaching Methodology  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México  
E-mail: jigr1965@hotmail.com

### **Oralia Salcedo Triana**

PhD in Public Administration  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México  
E-mail: osalcedot@hotmail.com

### **Daniel Ruiz Romo**

Doctorate in Law  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, Mexico  
E-mail: danielruiz\_romo@hotmail.com

### **Georgina del Pilar Delijorge González**

Doctorate in Teaching Methodology  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México  
E-mail: gym.delijorge@hotmail.com

### **Rosa María Muñoz Briones**

PhD in Forensic Science  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México  
E-mail: muoz3\_316@yahoo.com.mx

### **Luis Enrique Paredes Berumen**

PhD in Public Administration  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México  
E-mail: leparedes@hotmail.com

### **Rosa Aída Rivera Cornejo**

PhD in Public Administration  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México

E-mail: rosa\_aida33@yahoo.com.mx

### **Manuel Enrique Villela Varela**

Master in Tax Law  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México  
Teléfono móvil: 4921325444  
E-mail: enrique-612@hotmail.com

### **Juan Oliver Flores Ibarra**

PhD in Administration  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México  
E-mail: isc\_oliver@hotmail.com

### **Elisa Dinorah Galaviz Rendón**

PhD in Public Administration  
Autonomous University of Zacatecas  
Jardín Juárez #147, Col. Centro, C.P. 98000, Zacatecas,  
Zacatecas, México  
E-mail:

### **ABSTRACT**

Companies that carry out simulated operations have become a serious problem facing the tax administration in Mexico. These types of companies are known as “ghost” or billing companies. Most of the time, these companies do not have employees or domicile, but they have the papers in order before the corresponding instances, such as registration with the Treasury, before the Ministry of Economy, with constitutive acts, etc., and most importantly: they have stamps to issue invoices for providing services or producing goods that they are unable to provide.

They are companies that do not physically exist and are generally used to commit alleged crimes such as tax evasion, money laundering, or the diversion of public resources.

The “ghost” companies by themselves do not evade taxes, launder money, nor disappear public resources, but require a whole structure of corrupt officials who design the scheme to simulate contracts to divert the money, as well as multiple operators, such as financial advisors, lawyers, notaries, accounting firms and front names who execute it in the purest style of organized crime, in addition to the collusion of authorities that

allow and favor impunity and the protection of this network of corruption.

In the Mexican public administration, they have been used to disguise the diversion of resources, which should be used for the benefit of Mexicans, in favor of an individual.

In seven years, the Tax Administration Service (SAT) has detected almost 11,000 shell companies. The last update of the list, as of December 16, 2021, shows that a total of 10,990 companies that invoice simulated operations (EFOS) for more than two trillion pesos

were identified. The problem is so serious that the public sector acquired between 50 and 70% of all false invoices detected in recent years.

**Keywords:** Ghost companies, simulated operations, SAT, public sector.

## 1 INTRODUCTION

The present work has its origin in the problems faced by the Mexican Tax System with the appearance of Companies that Invoice Simulated Operations (EFOS) or non-existent, which at first had the purpose of tax evasion, and over the years, this mechanism infiltrated public agencies to divert public resources. Since January 1, 2014, article 69-B was added to the Federal Tax Code (CFF, 1981), which empowers the Tax Administration System (SAT) to detect companies that carry out non-existent or simulated operations. and annul the invoices they issue to, in turn, cut off the flow of money. (Camacho, 2018)

As of that year, the SAT began the publication of the list of "ghost" companies and on June 25, 2018, the Decree, (2018) was published in the Official Gazette of the Federation (DOF), which reforms the article in question, due to the various interpretations that its nature had generated. The Supreme Court of Justice of the Nation (SCJN) itself has encouraged the SAT not to act with all the force conferred by the powers contained in the CFF.

The companies that profit from the sale of Digital Tax Receipts over the Internet (CFDI) are known as EFOS (Simulated Operations Invoicing Companies because they invoice operations, purchases, or services that were never actually carried out.

These "ghost" companies intend to convince taxpayers that by buying these invoices they will reduce their taxes, in exchange for paying them a commission, which regularly attends a percentage of the amount of the invoice (Taxpayer Defense Attorney, 2018 ), which generally ranges from 4 to 8%.

These companies generate serious unfair competition to the detriment of Mexican companies and businessmen, who are working and paying their taxes. However, the taxpayers who buy these invoices become EDOS (Companies that Deduct Simulated Operations), that is, people or companies that simulate an increase in their operating expenses to pay fewer taxes by deducting those invoices (Defense Attorney of the taxpayer, 2018). This purchase and sale of digital tax receipts that cover simulated operations are one of the modalities that tax evasion acquires.

At first, the SAT went after the name lenders of the "ghost" companies, the majority of them with a low socioeconomic profile living in marginalized areas who were paid a minimal amount of money to become founding partners or had their identities stolen. , but not against those who create the companies and manage the money, which was fruitless.

The strategy of publishing the blacklist of "ghost" companies provided for in article 69-B of the CFF, has been insufficient since being created expressly to simulate operations, they are not interested in being exhibited as EFOS. It is more convenient for evaders to disappear from it and set up a new company to replace the one that the SAT detected and published. Therefore, it is estimated that its average life is fifteen months (Initiative that reforms, adds, and repeals various provisions of the Value Added Tax Law, the Income Tax Law, the Federal Tax Code and the Federal Law against Organized Crime and the Law of Coord., 2018).

It is important to put an alert focus on the corruption that has been taking place in public sector entities, be it from the Federation, the States, and the Municipalities that contract with budgetary resources simulated provision of services that, being intangible, is difficult. verify their effective delivery or provision, such as consultancies, logistics services, logo design, institutional image, advertising, studies, etc., in addition to the fact that they are paid to "ghost" companies.

In this way, public institutions resort to shell companies to simulate expenses in works such as street paving, purchase of materials, and remodeling of facilities, among others. Sometimes shell companies do provide the services for which they were hired but they do so with very low-quality standards that do not match the resources they received, other times the services are not even carried out. (Bacquerie, 2022)

## **2 OBJECTIVES AND GOALS**

The main objective is to make known what ghost companies are, what their *modus operandi* is, and what proposals have been made in Mexico to combat them.

The present work is justified because in our country it is a latent issue that deserves an exhaustive and in-depth investigation since the consequences are very serious since they cause not only the embezzlement of the treasury but also generate deficiency in services and an increase in public debt.

## **3 MATERIALS AND METHODS**

The present investigation has as main sources of information documents such as codes and laws in force in Mexico, books and magazines that talk about shell companies, national and local newspapers that on numerous occasions and very frequently present articles that denounce this type of crime, as well as official internet pages such as the Taxpayer Defense Attorney (Prodecon) which is an autonomous body defending taxpayers and the SAT; In addition, studies that experts have carried out on the subject. Therefore, it is considered that this work is of a documentary and descriptive nature.

## 4 RESULTS

"Ghost" companies are companies that have a perfectly legal existence on "paper"; that is, they are constituted before a notary, they are registered in the Public Registry of Property and the Federal Taxpayer Registry (RFC), they have a tax domicile, they have an electronic signature, and they issue invoices through the SAT platform. Some of these companies even pay small amounts of taxes to hide their criminal acts. (Roldán, 2018, p. 170)

These companies have two characteristics that define them. The first is that they disappear very easily, that is, when doing a physical verification, they are companies that do not have facilities or a real infrastructure, do not have staff working, or the capacity to provide services or produce goods. In their place are abandoned buildings, empty apartments, and dismantled offices. In the best of cases, a cubicle where a receptionist behind a counter assures that, coincidentally, the company that is trying to locate disappeared just a few weeks ago, this added to the simulation of operations which has led to them being known as shell companies.

The second characteristic is that the only mission these companies have is to issue invoices for non-existent or simulated services, which has also led to their being known as "invoicing companies" or "front companies".

Article 69-B of the Federal Tax Code (CFF) establishes that when the tax authority detects that a taxpayer has been issuing receipts without having the assets, personnel, infrastructure, or material capacity, directly or indirectly, to provide the services or produce market or deliver the goods covered by such vouchers, or that said taxpayers are not located, the non-existence of the operations covered by such vouchers will be presumed.

Since 2014, article 69-B was added to the CFF, which empowers the SAT to detect shell companies and render ineffective the invoices they issue to, in turn, cut off the flow of money. As of that year, the SAT began publishing the list of companies that carry out non-existent or simulated operations and on February 7, 2018, the First Chamber of the Supreme Court of Justice of the Nation (SCJN) declared the aforementioned article constitutional.

According to the book *La Estafa Maestra*, the procedure to integrate the blacklist is: First, if "the company is not at the reported address, its partners are name lenders, etc., the SAT includes the companies in a first list of" suspected ghost.

From that moment, the owners of the reported company have 30 business days to prove that they are a real company that has the infrastructure, assets, personnel, and capacity to perform services or produce goods. If this is verified, the company would go to the list of "distorted".

Second, if the taxpayers do not disprove this presumption, the SAT then issues new lists in which the accusation remains firm and the description of "ghost companies" is already definitive. These lists are also published in the Official Gazette of the Federation to warn that nobody can do business with these companies".

When appearing in the definitive list, the CFDIs that were issued are invalid and the taxpayers who used them must demonstrate that they acquired the goods or received the services.

Both the shell companies and the taxpayers who interacted with them are committing the crime of tax fraud, which is punishable by three to nine years in prison.

When it comes to public officials, the possible crimes that could be typified would be embezzlement (consisting of the misappropriation of money belonging to the State), money laundering (it is the concealment of those resources of illicit origin), and organized crime (when three or more people are organized permanently or repeatedly, to carry out operations with resources of illicit origin).

To understand how a ghost company works, we have the following example: a government agency hires a company to do a project. The shell company doesn't build anything, but it does receive the money from the contract. In exchange, it issues invoices that are real, since they are registered with the SAT, but in practical terms, they are false, since they are "legalizing" the payment of a work that was simulated, that is, it was never built.

Fake invoices have been used by governors, universities, local and municipal governments, as well as public agencies to evade the corresponding payment of their taxes.

Under the name of Master Scam, a group of journalists designated the set of irregular or fraudulent actions carried out jointly by Higher Education Institutions (HEIs) and federal agencies, at the request of the latter, to obtain financial resources that can be used for political campaigns or merely private appropriation by public officials of said agencies.

In the book *The Master Scam*. Graduated in disappearing public money, the fraud committed by public universities revealed in 2017 is summarized as follows:

a) It all starts in 2015, when it is discovered that of the one hundred audits carried out on Higher Education Institutions (HEIs) since 2000, and carried out by the Superior Audit of the Federation, 16 repeated the triangulation scheme between government entities, HEIs, and companies ;

b) the scheme involved 11 public agencies, a dozen HEIs, and several hundred companies, 128 of which were "ghosts";

c) the total number of operations carried out irregularly amounted to 7,700 million pesos, 3,400 of them located in shell companies;

d) all this set of activities was part of a complete system of corruption, which is discovered from the Public Account Reports presented by the Superior Audit Office of the Federation.

It was a State policy that was always planned so that the big politicians were invulnerable.

The authors insist on the permanence or constancy of the *modus operandi* used throughout all those years. The steps of this one were always the following:

The model consisted of using a loophole in the Procurement Law, which in article 1 allowed a government institution to make agreements to hire another institution without the need to make a tender (the mandatory process in the government when hiring or buying anything).

Let's give an example of the correct use of the famous article 1: if an organization such as the National Water Commission required an environmental study to evaluate the construction of a work, instead of a tender to hire a company, it would agree with the National University Autonomous of Mexico (UNAM).

That would save you time, get a job done by experts, and, incidentally, the money from the service would stay in a public institution.

But, in the Master Scam: the history of embezzlement, agencies such as the Secretariats of Economy, Education, Social Development and Agriculture, as well as Pemex, Banobras, the Institute of Adult Education, the ISSSTE Housing Fund ( Fovissste), and several others adapted the process with these simple steps:

1. A government agency established an agreement with a public university to perform alleged services that were not related to educational activity and were as varied as distributing groceries, locating people who did not know how to read, installing a telephone network in buildings, or drilling wells. tankers.

2. The university kept between 10% and 15% of the "moche" of the amount that the dependency paid it and with the rest, it subcontracted to the companies that the dependency told it.

3. The companies were shell or illegal. They had no employees, infrastructure, or capital to do any service. They only existed on paper.

4. The services were not fulfilled or, in the best of cases, they only hired a legal company that did the work and the rest of the money passed from company to company.

The last step for the perfect crime was to "close" the agreement. The Law required the agency that, before paying the university, it should have photographs, reports, lists, official letters, or whatever served as proof that the service had been performed, which are officially known as deliverables.

These documents officially justified the departure of public resources.

For example, the Secretariat for Social Development (Sedesol) already had verifiable documents ready, already signed and everything and the Secretariat only signed a receipt accepting compliance with the service (which only existed on paper). The Universities had only been intermediaries so the money ended up in shell companies. (Roldán N. & Ureste M., 2022)

There were 3 thousand 433 million pesos that were delivered to ghost companies whose partners live in neighborhoods and one billion more pesos were the commission for the universities and the rest was used to, supposedly, contract services. In many cases, there is no documentary evidence that they ever existed.

Public universities had budget cuts every year and debts that, until 2017, had seven bankrupt due to the growth of payrolls, benefits, and retirements above their budgets, so they were fertile ground to repeat a diversion scheme as many times The federal agencies wanted it because no one would suspect them, but that does not justify their participation in the Master Scam.



## 5 DISCUSSION

On November 8, 2019, the Tax-Criminal Reform was published in the DOF, which entered into force on January 1, 2020, modifying five legal regulations, the Federal Law Against Organized Crime, the National Security Law, the National Code of Criminal Procedures, the Federal Tax Code and the Federal Criminal Code (2019).

Through this reform, the tax crime of buying and selling invoices that cover simulated operations is classified as an organized crime (Saldívar, 2018), when the damage to the treasury is greater than \$7,804,230.00 and at least three taxpayers participate, a situation that will warrant informal preventive detention in terms of the National Code of Criminal Procedures (Robles, 2019).

According to the Decree that amends, adds, and repeals various provisions of the Federal Tax Code, the National Code of Criminal Procedures, the Federal Law against Organized Crime, and the National Security Law, (2019), as indicated in Article 113 Bis of the CFF, a penalty of two to nine years in prison will be imposed on those who, by themselves or through an intermediary, issue, buy or acquire tax receipts that cover non-existent, false operations or simulated legal acts.

Likewise, anyone who knowingly allows or publishes, through any means, announcements for the acquisition or disposal of tax receipts that cover non-existent operations, will be penalized with the same penalties.

When the crime is committed by a public servant in the exercise of his functions, he will be dismissed from employment and disqualified for one to ten years, in addition to the aggravating circumstance indicated in article 97 of the CFF. A complaint will be required by the Ministry of Finance and Public Credit, to proceed criminally for this crime. This crime and the one provided in article 400 Bis of the Federal Penal Code (CPF), may be prosecuted simultaneously (2019).

According to La Jornada, these measures to combat "ghost" companies could translate into an increase of more than a third in the public budget and, consequently, would place the federal, state, and municipal governments in a position of strength to promote economic development, create jobs, combat poverty and guarantee basic services to the population (2018).

For the MDF María Fernanda Haro Mejía, the modification has caused controversy by equating the behavior of failure to pay contributions with the commission of a crime such as homicide, child trafficking, terrorism, or genocide, considering it an excessive and disproportionate measure, due to what certain groups plan to address the issue before the Supreme Court of Justice of the Nation through an action of unconstitutionality. (Haro, 2019)

Likewise, the possibility that a taxpayer is co-susceptible to fall into the assumption of tax fraud and consequently as part of organized crime under arbitrary decisions by the SAT, has caused terror, the fact that a company has the material documentation that supports the activities carried out, but said authority considers it insufficient and it is declared that it invoices or deducts simulated operations, this due to the well-known merely collecting position that the tax authority maintains (Haro, 2019, p. 43).

Some people or companies profit from the sale of Digital Tax Receipts (CFD), which are known as EFOS (Invoicing Companies for Simulated Operations) or "ghost companies", because they invoice operations, purchases, or services that were never actually carried out. just; that is, they simulate that the taxpayers to whom they issue the invoices are their clients.

These shell companies intend to convince taxpayers that by buying these invoices they will reduce their taxes, in exchange for paying them a commission, which is regularly a percentage of the amount of the invoice, which generally ranges between 4 and 8 %.

The companies that sell this type of invoice are, for the most part, service providers, since these, being intangible, have the advantage of not being able to be traced as easily as the sale of goods or merchandise.

These companies generate serious unfair competition to the detriment of Mexican companies and businessmen who are working and paying their taxes.

However, the taxpayers who buy these invoices become EDOS (Companies that Deduct Simulated Operations), that is, people or companies that simulate an increase in their operating expenses to pay fewer taxes when deducting those invoices.

This purchase and sale of digital tax receipts that cover non-existent or simulated operations are one of the modalities that tax evasion acquires.

The main cause of the drop in collection by the SAT is due to the operations simulated by the EDOS such as: Unduly increasing deductions, requesting fraudulent VAT refunds for said operations, invoicing goods that did not pay import taxes, and money laundering.

The use of these vouchers has caused damage to the tax system, such as the lower or null payment of taxes and an increase in requests for the return of credit balances covered by said vouchers to the detriment of collection.

## **6 CONCLUSION**

The so-called SAT blacklist, which came into force in 2014, is based on article 69-B of the Federal Tax Code, which specifies that when the tax authorities detect that a taxpayer issues invoices without having the assets, personal, infrastructure, or material capacity to provide services or market goods, or if they are not located, the non-existence of the operations will be presumed, that is, they simulate operations or are shell companies.

The SAT notifies the taxpayer that he has been identified as an alleged simulator through his tax mailbox and he will have a period of 15 days to distort the facts that led the authority to presume the simulation of operations.

The 69 B list is updated quarterly on the SAT portal and in the Official Gazette of the Federation. Those taxpayers who are included in the final list will have their digital stamp certificate canceled, which



will prevent them from issuing invoices and the tax receipts that they have issued five years ago will lose their tax effect.

While the taxpayer must disclose his name, address, and Federal Taxpayer Registry (RFC), and in case of non-compliance with the SAT his data is made public, in the case of public entities there is no transparency or accountability. The SAT does not give them the same treatment as taxpayers. The Tax Code says that public institutions are not required to pay income tax and this is an argument used by the SAT as if they were in a different section and it is not. It is questionable that the SAT does not give the same treatment to the taxpayer and public entities, since the latter have fewer obligations and responsibilities than a taxpayer.

The operations that the public administration carries out with ghost companies are not penalized or prosecuted with the same rigor as the operations that are carried out between two taxpayers. The contracting of shell companies from public entities may constitute serious and non-serious administrative offenses established in the Law of Administrative Responsibilities of Public Servants, such as crimes related to corruption: bribery, embezzlement, misuse of information, and acting under interest conflict. But the great challenge continues to be the lack of internal investigations in the public administration that lead to effective sanctions and prevent acts related to corruption.

The lack of will in the public administration to implement effective measures to prevent the contracting of shell companies, from the beginning of the process of contracting services and/or acquisitions until the last payment to the supplier is completed. "We see an unwillingness to track the diversion of public resources." (Ramírez, M., 2021)

For Luis Pérez de Acha, an expert in constitutional, fiscal, and administrative law and former president of the Citizen Participation Committee of the National Anti-Corruption System, the criminal-fiscal reform of January 2020 inhibited outright, albeit temporarily, the purchase and sale of invoices as a mechanism to evade taxes. However, the EFOS business did not decline. Simply, its marketing was redirected to the increase in public contracts, especially in the federal entities, whose budgets are integrated, for the most part, with federal participation and contributions from income collected by the Tax Administration Service (SAT). In 2022, these transfers will amount to 1.8 trillion pesos, an exquisite delicacy for billers, equivalent to 90% of the total ISR of 2 trillion.

At the federal, state, and municipal level, the budget is high. In the logic of dishonest officials, it is a 'mistake' not to appropriate the money through the EFOS.

Shell companies are multifunctional: they carry out false operations to evade taxes as well as enter into contracts for works and non-existent public services. They are also used to launder money, as well as to transfer it to tax havens or return it to Mexico. All these criminal behaviors are committed, of course, through the financial system. The idea that payments between taxpayers and government entities are made in cash is archaic and unrealistic.

In the same way, the EFOS is used to dispose of the 'commissions' paid by employers to civil servants under the public contracts that they assign to them. They are illegal expenses that, to be deducted, taxpayers support with invoices from shell companies.

Another variant of the billing companies is that the diverted resources are used to finance political campaigns, obviously illegally. The business is round for political parties, candidates, and elected officials, which guarantees their unbeatability. Corrupt officials are the first disinterested in fighting the problem, not even to lessen it.

One of the main problems is that tax legislation, such as article 69-B of the Federal Tax Code, is only enough to combat tax evasion. This legislation is inapplicable in public procurement and insufficient to impute crimes of government corruption. On the near horizon, a far-reaching legal reform in the exercise and destination of public spending seems unfeasible.

To combat ghost companies, it is essential to create the Tax Intelligence Unit, a national plan for said combat through quarterly reports.

This must undoubtedly include the participation of the Attorney General of the Republic (FGR), the SAT, the National Banking and Securities Commission (CNBV), the Financial Intelligence Unit, the Congress of the Union, civil organizations, schools, and academies to avoid the commercialization of invoices, as well as a Mexican Council to combat tax evasion.

## REFERENCES

1. Bacquerie, J. (2022). ¿Qué es una empresa fantasma y cómo funciona?. Mexicanos contra la corrupción y la impunidad. (MCCI)
2. Camacho, R. (2018). Planeación fiscal y defensa del 69-B y 69-B Bis y comentarios a la reforma fiscal del Código Fiscal de la Federación. México: Tegra Consultores.
3. Código Fiscal de la Federación. (31 de diciembre de 1981). Publicado en el Diario Oficial de la Federación.
4. Decreto por el que se reforma el Artículo 69-B del Código Fiscal de la Federación. (25 de junio de 2018). Diario Oficial de la Federación.
5. Decreto por el que se reforman, adicionan y derogan diversas disposiciones del Código Fiscal de la Federación, del Código nacional de Procedimientos Penales, Ley Federal contra la Delincuencia Organizada y de la Ley de Seguridad Nacional. (08 de Noviembre de 2019). Diario Oficial de la Federación.
6. Haro, F. (2019). Defraudación fiscal=Delincuencia organizada. *Stratega Business*, 8(42), págs. 42-43.
7. Iniciativa que reforma, adiciona y deroga diversas disposiciones de la Ley del Impuesto al Valor Agregado, de la Ley de Impuesto sobre la Renta, del Código Fiscal de la Federación y de la Ley Federal contra la Delincuencia Organizada y de la Ley de Coord. (2018).
8. Lira, C. (29 de Agosto de 2018). Facturas falsas, desfalco al país. *La Jornada*.
9. Pérez de Acha, L. Empresas fantasma y desfalco público. (26 de septiembre de 2022). *Animal político*.
10. Procuraduría de la defensa del Contribuyente. (08 de febrero de 2018). Prodecon alerta sobre la simulación de operaciones a través de comprobantes fiscales digitales.
11. Ramírez, M. (2021). *Empresas Fantasma: Una mirada desde la sociedad civil y el periodismo. Iniciativa Sinaloa*
12. Roldán, N., Castillo, M. & Ureste, M. (2018). *La Estafa Maestra. Graduados en desaparecer el dinero público. México: Temas de hoy.*
13. Roldán, N. & Ureste, M. (2022). *La Estafa Maestra: La historia del desfalco. México: Planeta*
14. Robles, L. (11 de septiembre de 2019). Usar facturas falsas es crimen organizado. *Excelsior*.
15. Saldívar, B. (02 de octubre de 2018). Le daremos un gran golpe a las facturas falsas: Prodecon. *El Economista*.
16. Saldívar, B. (06 de enero de 2022). En siete años, el SAT ha detectado casi 11,000 empresas fantasma. *El Economista*.