



# Going Where You're Treated Best

*Tax-Based Migration From High to Low tax jurisdictions*

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## Executive Summary

Many Western and Scandinavian have continued to raise taxes while the cost of living in their countries has continued to rise. In contrast, the amount of subsequent benefit the individual taxpayer receives continues to decline and decline rapidly as you get into the top tax brackets. This has caused wealthy individuals, high-income earners, and even regular retirees to seek opportunities elsewhere to improve their standard of living. This Study aimed to conduct exploratory research into the main drivers of taxed-based migration that cause individuals to leave higher-taxed Western and Scandinavian countries and migrate to lower-taxed jurisdictions and if there will be an increased demand for residency in lower tax jurisdictions in the future. Using qualitative research methods such as exploratory interviews and surveys, backed up by research techniques such as the Delphi method, I aimed to uncover a consensus among a series of Transfer Agents as well as a group of individuals who migrated from high to low tax jurisdictions as to what the main drivers behind the migration were. After evaluating the data collected and allowing the participants to confirm data points, I identified the main drivers of migration. These drivers included lifestyle choices, personal and family ties, employment, retirement decisions, as well as certain tax-based strategies. But primarily, the participants noted that the main drivers that drove the migration were purely functions of individuals seeking to improve their standard of living for themselves and their families. To conclude, the empirical evidence suggests that while the main drivers of the migration are generally ideologically driven, tax benefits or breaks serve as a secondary driver that provides additional incentives to the individual when making a migration decision and often ends up serving as a tiebreaker when the individual is having trouble making a decision.

# 1. Introduction

Based on the research conducted by Kleven et al. (2013) and Graham et al. (2014), we know that people have been migrating based on taxation for the past century and will most likely continue to do so for the foreseeable future. The phrase "Going where you're treated best" that is used in the title of this study was inspired by the book *The Nomad Capitalist* (Henderson, 2018). The idea of it being that you should live in a country that treats you best in relation to taxation, lifestyle, and benefits, new opportunities, and provides you with the services you desire. This implies that the country you currently reside in might not be treating you best and is more geared towards other things than your best interest. As a result, individuals look towards migration which often leads to becoming a resident or citizen of a different nation and, in some cases renouncing their original citizenship. With the rise of the internet, the level of connectedness, and now the work from home revolution brought on from the COVID-19 Pandemic, individuals have more choices as to where they wish to be located. There has been a mass exodus from large cities to smaller towns, states & provinces with lower tax rates, and even low countries promoting remote work visas. This has given individuals with the flexibility to relocate an opportunity to not only work from remote islands on the beach in the sun but to lower their overall tax burden in the process while potentially increasing their standard of living.

Western and Scandinavian countries or "high tax Jurisdictions" have continued to raise taxes while the cost of living in their countries has continued to rise, and salaries have stayed flat. This has occurred while the amount of subsequent benefit the individual taxpayer receives continues to decline, more rapidly so as you get into the top tax brackets. Recently there has been a cultural shift in attitudes towards taxing high-income earners and wealthy individuals, with slogans such as "tax the rich" being frequently used. News anchors and politicians are constantly calling on the individuals to pay their fair share when in fact, they are paying more than their "fair" share and generally subsidize much of the population (Wessel, 2020). Thus, to a pragmatic person, the value proposition of living and working in these countries is a poor one when compared to low tax jurisdictions with similar services, standards of living, and lifestyles. The Covid-19 Pandemic has become a major catalyst for rising taxes as governments have added to their massive amounts of debt to finance vaccines, government programs, and other spending, which has blown a hole in fiscal budgets around the globe.

This, coupled with the current political climate, rising levels of unemployment, and inflation, the easy thing for governments to do is say, "we are going to tax the wealthy and make them pay their fair share" (Gabbatt, 2021). This has opened many individuals up to the idea of tax-based migration in order to keep more of what is there and to seek out greener pastures where they are free to do as they please and are treated better than in their home countries. This has created a problem by increasing the number of tax outflows which in theory could result in different jurisdictions having unbalanced budgets due to a lack of tax revenue, such as hedge fund manager and billionaire David Tepper decided to relocate from New Jersey to Florida after the state increased its tax rate by 2.62% resulting in over a hundred-million-dollar shortfall the next year (Frank, 2016).

After considering the above, the first research question I have chosen to explore is: What are the main drivers of taxed-based migration that cause individuals to leave high-tax Western and Scandinavian countries and migrate to low-tax jurisdictions?

To begin answering this question, I have narrowed the focus of the Study to Individuals migrating from Western and Scandinavian countries for tax purposes. This narrows the scope to two specific regions while reducing broadness and making comparisons between individual countries easier as the regions are similar in regard to taxation and tax rates.

Building off the first research question in a forward-looking way, the second research question I have chosen to explore is: Will there will be an increased demand for residency in lower tax jurisdictions in the future? This question is significant as while more and more people continue to pay to migrate out of their countries and the prevalence of working from home due to the COVID-19 Pandemic becomes common practice, certain countries will become more valuable to enter and reside in. The Pandemic has also highlighted the value of having the freedom of movement that comes with a second residency or passport. Individuals with dual residency or multiple citizenships have had the benefit of being able to choose where they would like to be located a little bit more freely.

The research was structured using interview questions and surveys in an exploratory way. The purpose of that is to aid the researcher to gain greater insights by asking open-ended questions without creating bias by leading the participants (Shukla, 2008). As well the Delphi Method was used while interviewing the Participants and following up with the survey respondents to allow for more concise answers and consensus among the group of

experts (Skulmoski et al., 2007). The research also implemented techniques such as comparing the finding of the primary research to conclusions drawn from examining secondary research conducted in a preliminary literature review.

The main results of this study show that the main drivers of taxed-based migration that cause individuals to leave higher-taxed Western and Scandinavian countries and migrate to lower-taxed jurisdictions are personal reasons are 1) Lifestyle, 2) Retirement and 3) Employment decisions. This is similar to the results found in the literature related to drivers of migration that state migration possibilities are often conceptualized by an individual as "migration aspirations" and that socio-economic factors are viewed as the main driver of migration (Carling and Collins, 2018).

The study also reveals that residency in low-tax jurisdictions has become a valuable commodity in economies with high tax rates. This is due to the increased freedoms and values the added value the second residency provides the individual making the migration choice and is backed up by literature that states a second residency improves upon the shortcomings and restrictions of one's primary resident citizenship (Harpaz,2019).

Researchers around the globe and generally focused on the outflows of money and the dollar values when discussing tax-based migration, "tax havens," and tax avoidance, as seen in multiple studies. One Study by Study focused on the percentage of tax increases and how that relates to the percentage of migration outflows in high-income earners in developed countries (Esteller et al., 2016). Another Study similarly focuses on how tax reform affects the migration rates of the wealthy to lower-taxed areas and the percentage change of the number of people who migrate (Martinez et al., 2017). What these studies do not focus on is why the wealthy individuals are actually migrating and assume that it is solely based on the tax changes or to live in a lower jurisdiction.

This study should be of particular interest to researchers at tax centers and government workers who are designing policies related to tax and other issues that affect the day-to-day lives of their citizens. The Study considers the sociological, demographic, and ideological reasons behind the migration process from high to low tax jurisdictions and interviews the individuals who have completed the migration process and the Transfer Agents who've helped them and thousands of others in the process.



This study aims to contribute to the current body of research that has been formed around tax-based migration by challenging current beliefs that are pertaining to the reasons individuals migrate to low-tax jurisdictions. This will allow researchers to view tax-based migration through an additional lens in the future, allowing them to add an additional dimension to their research instead of solely focusing on tax rates and tax havens.

## 2. Literature Review

This research study aims to add the previous research in the area of tax as well as migration by addressing the topic of tax-based migration on a global scale. While the information on tax and migration is plentiful, information on tax-based migration is somewhat more limited to research done within individual countries for the most part and usually consists of quantitative data rather than primary qualitative data. Based on this, the Study seeks to utilize available literature on tax and migration to reinforce findings from interviews and surveys and as comparisons during analysis.

Carling and Collins (2018) identify key drivers related to the migration decision as well while identifying theories that support the concept of migration drivers. It also provides context into the individual socio-economic factors that influence the individual's justification of migration decisions (Carling & Collins, 2018). This is important as it provides us with a greater understanding of why individuals make their migration decisions starting at the most basic levels up into more complex ideological spaces within the individual's thought process.

Harpaz (2019) puts the analytical focus on global inequality in the value of citizenship while outlining the uses of a second citizenship or residency and the meaning it has to its holder (Harpaz, 2019). This article is relevant to the second research question this study seeks to answer as well as the general research as it discusses topics such as how the individual uses the second residence to compensate for the shortcomings of the primary residence and the value it brings the individual (Harpaz, 2019).

Kleven et al. (2013) analyzed the effects of top tax rates on the international migration of football players in 14 European countries in hopes of drawing conclusions that higher tax rates on highly paid workers may induce such workers to migrate to countries where the tax burden is lower (Kleven et al., 2013). This is relevant to the research I will be conducting in this Study as I will mainly be focusing on wealthy individuals and high-income earners, as well as conducting interviews with Transfer Agents whose fees limit their clientele to those who are able to spend significant sums of money on professional services while as searching for the relationship between tax rates and migration decisions.

Afonso (2015) conducted a study in the United States that analyzed military data from 1998 – 2005 that showed that taxes deterred service members from legally residing in certain

states while other states with no taxes or with exemptions for military wages experienced 100% and 39% more service member residencies (Afonso, 2015). His Study also noted economic theory that suggests that high-income workers exit high tax areas often to be replaced by low-income workers once a certain tax threshold is met (Afonso, 2015). This is in line with the research conducted by Kleven previously noted and is relevant as it shows that as workers begin to earn more money, they are able to make migration choices as to where they would like to reside and how they would like to be taxed. It also provides the reader with insights into why some high-paid workers are deterred from moving to high tax jurisdictions as the tax burden would be too much to handle.

Esteller et al. (2016) conducted a study that identified the rate at which high-income earners migrate out of a country after a top marginal tax rate increase of 1%, which data showed was between 1.5-3% (Esteller et al., 2016). This is relevant as it shows the elasticity between tax increases and migration outflows. I found this interesting as the current trend around the globe has been to increase tax rates at the top marginal rate and in other ways as well by much more than 1%. Which based off this Study would suggest that countries will notice a significant increase in net outflows of high-income earners in the coming years.

Lastly, a 2017 article titled Beggar-thy-neighbour tax cuts: Mobility after a local income and wealth tax reform in Switzerland published by the Luxembourg Institute of Socio-Economic Research, which discussed the extent taxpayers respond to differences in income tax rates by migrating to low-tax areas (Martinez, 2017). This article is useful as it discusses the elasticity of the taxpayers and how they respond to changes in their tax environments. It also talks about how large tax changes for top earners created by the regressive schedule and the later introduction of the flat-rate tax in 2008 in the swiss canton further may have triggered adjustments in the taxable income of the resident population as well resulting in net migration outflows which could be used as a predictor as to what will happen when western and Sanndivian governments begin to raise taxes to compensate for their increased spending due to the COVID-19 Pandemic (Martinez, 2017).

### 3. Methodology

This section of the Study focusing on methodology provides the reader with insight into the purpose of the study, the research design, and methods used to conduct research and collect data. It also provides the reader with visuals of the interview guide questions and online survey used to collect primary data for the Study.

#### 3.1 Hypothesis

The research will be guided by the following research questions and structured parameters (see Appendix 1) and well as an online survey to be sent to individuals who have migrated from high to low tax jurisdictions (see Appendix 2).

The first research question is: What are the main drivers of taxed-based migration that cause individuals to leave higher-taxed Western and Scandinavian countries and migrate to lower-taxed jurisdictions?

This question will aim to uncover who is migrating for tax purposes by interviewing transfer agents to uncover the demographics of individuals who are migrating, their socio-economic status, and their Income and employment sources. It will also aim to uncover what barrier and jurisdictional issues, if any, are there to tax-based migration, as well as the nature of the transfer agent business and how agents help individuals navigate those barriers. Lastly, it will aim to uncover the main drivers that have caused the actual migration and rank them based on commonality and importance.

For this question, I came up with multiple hypotheses that could explain what drove individuals to make their migration decisions, including H1) Tired of paying more taxes than they have to. H2) In search of a better lifestyle, more freedom, and a change of scenery. H3) Looking for a more economical retirement. H4) To operate their business in a way that enables it to grow faster and more freely, unburned by unnecessary taxes. H5) To transfer their wealth to their children in a more efficient manner that preserves as much of it as possible.

These hypotheses were tested in the online surveys by asking respondents what the main factors that contributed to their decisions to move were as well as in the interviews with the 6 Transfer Agents when asking questions found under the "drivers of migration" section in Appendix 1. The findings for both the interviews and the surveys can be found in sections 4.1 and 4.2.

For the second research question: Will there will be an increased demand for residency in lower tax jurisdictions in the future? I aimed to make this question more forward-looking to gather insights such as: will the ability to move freely between tax jurisdictions become more valuable? As well: will governments begin to restrict the ability of their citizens to change their tax jurisdictions through methods such as citizenship-based taxation or dual taxation?

For this question, I had three hypotheses as to predict if there will be an increased demand for residency in low tax jurisdictions in the future, those being: H1) As taxes rise in economies with already high tax rates compared to their peers, the value that individuals put on residency in a low tax jurisdiction will rise similarly to a commodity. An equation for this would be: (current total tax burden – annual tax savings after migration = value). H2) The barriers that countries put in place to prevent migration to low tax jurisdictions will likely increase, thus increasing the costs that one will have to incur to migrate to a low tax jurisdiction making residency more desirable due to scarcity. H3) The ability to move freely throughout regions due to having additional residence permits will make residency in the jurisdictions more coveted and valuable.

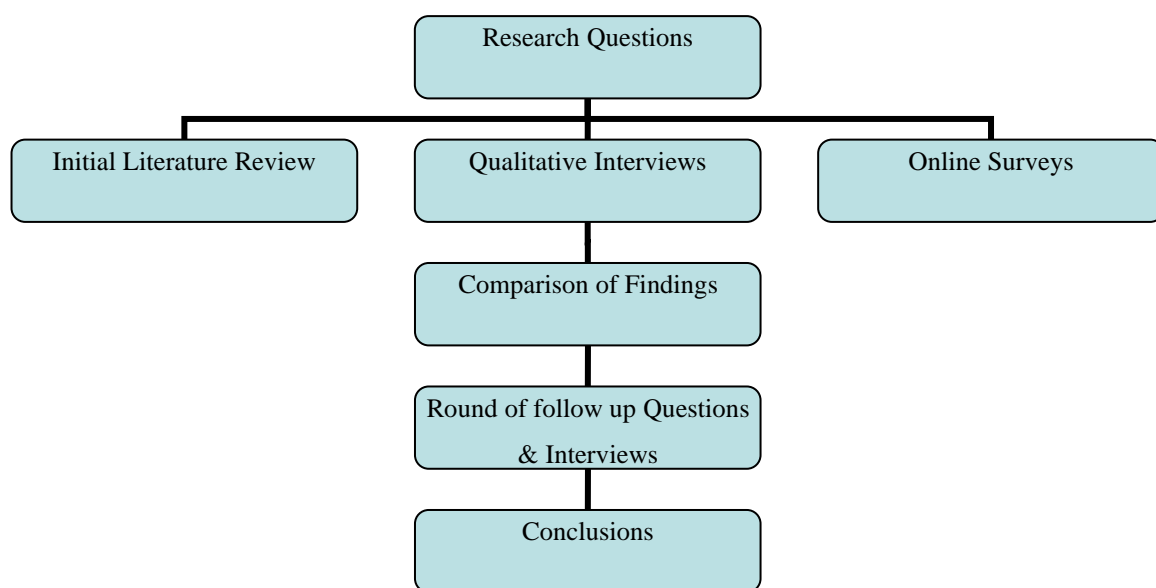
Lastly, Survey data will be used to further test hypotheses, reinforce conclusions, and give us a realistic idea of the tax-based migration patterns of different people from different regions, socio-economic backgrounds, and industries (see Appendix 2).

## 3.2 Research Design

I used a qualitative research design to better understand what the specific drivers were as they related to the research questions, which led me to structure my questions and surveys in an exploratory way as an exploratory research design is mostly qualitative and allows the

researcher to dig deep and probe for more in-depth answers (Shukla, 2008). While the interviews were based around the questions laid out in Appendix 1, I chose to let the interviews stray from time to time, so they became more candid and even a bit casual and semi-structured as semi-structured interviews have been known to be the ideal method for gathering descriptive insights during an interview (Bogdan and Bicklen, 2003). This, in fact, led to the collection of copious amounts of data collection as 'Contrary to popular perception, qualitative research can produce vast amounts of data, and a single interview can lead to roughly 20-40 pages of transcripts' (Pope et al., 2000).

The following research design was used for the Study and is broken down into steps below:



First off, I came up with two research questions tailored to the Study, which would generate enough insight into tax-based migration from high to low tax jurisdictions making the Study relevant and contributive to tax research. After that, I came up with multiple unique hypothesizes to test as which would allow me to draw conclusions from my findings.

I also utilized online surveys and conclusions drawn from a narrow literature review that I conducted to compare to the interview findings and help me draw initial conclusions before utilizing the Delphi model and going back to the participants for the second round of questions which should clarify any gaps in the research and build on any initial conclusions. The utilization of online surveys sent directly to the participants allows for efficient data collection and results in real-time while gathering data from respondents in other countries; online surveys are also very cost-effective and time-efficient (Ilieva et al., 2002). The utilization of a narrow literature review also helped with research design as I was able to

extract key takeaways, which helped guide topic choices for questions as well as helping with conducting purpose-driven research (Randolph, 2009).

Lastly, I decided to utilize the Delphi method while conducting my research as the Delphi method's purpose is to obtain a concise opinion across a pre-selected group of experts (Gordon, 1994). The Delphi method also allows for many rounds of questions or interviews, which is crucial for drawing conclusions and gaining a concise opinion across a group of participants as well as answering any new questions that arise during the research (Skulmoski et al., 2007).

I then finalized my conclusions through analysis based on a set of data points generated from the interviews and survey data and the interpretation of the qualitative data generated through interviews. This allowed me to hypothesize a preference ranking that considers the key drivers of migration.

### 3.3 Utilizing the Delphi Method

The procedure I used while implementing the Delphi method was that initially, I interviewed all six Transfer Agents and sent out online surveys to the ten subject participants who have migrated for tax purposes in the past. They were known to me but kept anonymous to each other. After completing the interviews receiving the results from the surveys, I began to compare and dissect the data identifying patterns and drawing statistical inferences. Once this was completed, I combined the answers of each interview subject separately, each survey respondent, into what I determined to be the generally accepted opinion or most acceptable answer based on a percentage of recurrence and, in some cases, the average answer. I then re-interviewed the six subjects, briefly asking any follow-up questions that had arisen and to present my findings to see if they agreed with the group consensus. Similarly, with the ten survey respondents, I contacted them with the results that I had drawn from their surveys and asked them if the findings seemed acceptable or if they would change anything.

### 3.4 Selection of Participants

For the purpose of this study, I decided to use a mixture of Convenience Sampling and Purposive Sampling as I am focusing my research on a very specific migration pattern and not trying to make generalizations about the entire population.

A Caveat to this Study resulting from the COVID-19 Pandemic and the inability to travel to each location discussed in the study was the small sample size used for the interviews and surveys. Being a slightly taboo topic due to the negative press that has been directed at the wealthy as of lately and at so-called "Tax Havens," individuals and Transfer Agents are not the most forthcoming due to the fear of being tricked by a journalist, doxxed, or blacklisted by the offshore tax community. Therefore, the participants for this Study were hand-selected from a pool of experts based on referrals from other experts as well as referrals through personal contacts and expat forums. This limited the participants to the ones that were able and willing to participate in virtual interviews as well as online surveys. Therefore, the sample is small, but it is unclear how this impacts the generalization ability of the results.

### 3.5 Data Collection

The bulk of the data collected was collected by asking open-ended questions during virtual and telephone interviews, with everything being transcribed by me and occasionally being recorded with the expressed permission of the subjects of the interview and the promise of confidentiality.

While this research study aims to produce the most accurate data, factoring in all the inputs that can be gathered, it is important to understand based on the current Pandemic and geographical challenges of this study, as well as the availability of reliable data, will impose limitations on this Study.

First off and most relevant is the current COVID-19 Pandemic and the limitations that it brings with it, both geographical and political. The research study revolves around the ability to interview both Transfer Agents and individuals in a wide variety of international jurisdictions and with me currently residing in Canada and the travel restrictions by both the Canadian and international governments.



To ensure the reliability and validity of this study, I made sure to select transfer agents from different industries and countries to interview so as to give a better picture of tax-based migration on a global scale and the industry as a whole. Secondly, when distributing surveys, I made sure that I distributed a survey to a respondent in every country that I highlighted, which in addition to the previous step, further eliminated country bias or unnecessary narrowing of the scope of the Study. Lastly, to ensure the interview process and research was conducted free of biases that could have affected the outcome of the study, I had the results externally audited by a third-party colleague.

### 3.6 Data Analysis

The transcripts were examined to identify patterns and draw statistical inferences on the migration patterns of those leaving higher tax jurisdictions and heading to low or no-tax jurisdictions, as well as themes such as Demographics, Income and Employment type, Barriers, Transfer agents, Jurisdictional and Drivers of Migration. The data was then coded, and I filtered the irrelevant and unreliable data out when conducting the analysis. The remainder of the data that was collected was collected through online surveys using google forms which analyses the data and returns the results for you using its own software. I then compared all of the collected primary data using tables created in Microsoft excel.

## 4. Findings

In this section, the findings from the interviews and surveys are presented, hypotheses from the research questions are tested based on the data that was collected through primary qualitative research and supported by secondary research narratives from the literature review. Lastly, the results are explained and visualized using tables.

### 4.1 Survey Respondents

10 Participants were selected to answer online surveys based on their experiences migrating from high tax jurisdictions to low tax jurisdictions. The goal of the surveys was to gain primary data and insights into the tax-based migration process and the driving factors behind the migration decision. The participants were kept anonymous and, for the purpose of this study, have been coded as respondents 1-10. Below is a summary of the results the surveys have uncovered:

#### **Respondent 1:**

A Finnish Poker player who migrated to Monaco, who originally migrated as he wanted to somewhere with an active poker scene in a warmer climate. Before migrating, he considered both Las Vegas and Monaco but settled on Monaco based on the fact that he would pay much less in taxes residing there; it was still in the continent of Europe and thus closer to his family, as well as the fact the migration process was simpler. His annual earnings vary from year to year but are almost always in the 6-7 figure range, and the fact that he moved from Finland to Monaco brought his average annual tax rate down to zero from highs of around 50%. He is completely happy with his decision to migrate and would not change anything about the process.

#### **Respondent 2:**

A South African e-commerce entrepreneur who migrated to Thailand & Malaysia, who originally migrated due to turmoil in his nation and the difficulty he had doing business there. Before migrating, he considered a variety of options but settled on the Asian nations as they had the fewest barriers to entry. Annually he earns in the mid-six figures, but due to

the territorial taxation schemes that come with his residency and the fact that he conducts his business online, he does not pay income taxes which amounts to a large cost savings from the 40-45% he previously paid. When it comes to his decision to migrate, he wishes he had more time to explore other options and possibly relocate to a predominantly English-speaking country instead.

**Respondent 3:**

A Canadian strategy consultant who migrated to the United Arab Emirates, who originally migrated there for the benefit of not having to pay personal income tax and the ample business opportunities. He did not consider any other places when making his decision to migrate and reduced his income taxes to zero from above 50%. He is completely satisfied with his migration and would not change anything.

**Respondent 4:**

An American former banker who migrated to the Bahamas, who originally migrated there as he wanted a lifestyle change going into retirement and enjoyed sport fishing. Before migrating, he considered a few Caribbean nations but ended up choosing the Bahamas due to the proximity, daily flights to the US, and use of the US dollar. The fact that there are no income or capital gains taxes in the Bahamas brought his effective tax rate down to zero from what would have been above 35% back in the United States during the remainder of his retirement. He is content with his migration decision and found that there were little to no barriers to his move other than his yearly US tax reporting requirement.

**Respondent 5:**

A Swedish gaming industry employee who migrated to Malta, who originally migrated due to a job offer. He did not consider any other locations while migrating due to his migration being for work, which also eliminated many barriers to entry for him. His personal tax for his 6-figure salary is now 15% instead of the 59% that it would be back in Sweden. He is very happy with his current residence and would not return to Sweden but would consider relocating elsewhere for work.

**Respondent 6:**

A Canadian industrialist who migrated to the Bahamas migrated due to the warmer climate and wanting to make the most of his retirement with his wife sailing in the Caribbean. He and his wife considered many options for their retirement but ultimately chose the Bahamas as it was the most familiar to them as they had spent many holidays there in the past. Their income tax rates were modest, to begin with, as they are retired and living off pensions and investments, but those rates have now been reduced to zero, which affords them a higher standard of living. They are happy with their migration decision but still spend about three months a year in Canada visiting family.

**Respondent 7:**

A British investor who migrated to Monaco who migrated based on lifestyle decisions as well as the tax benefits he would receive residing in the principality. He considered a few British Overseas Territories as well as Monaco but settled on Monaco due to the proximity to the UK and European / Mediterranean lifestyle. His tax rate decreased to nearly zero from the over 30% he was paying on dividends and the 20% he was paying on capital gains. He is happy with his migration, although he would be willing to relocate again if he felt it would benefit him in the future.

**Respondent 8:**

A dual US & Canadian former Founder and CEO who migrated to Switzerland, who migrated based on personal as well as family decisions linked to his swiss ancestry. He did not consider anywhere else before relocating. He reduced his total tax rate to below 5% from above 40%. He and his family are very content with their migration but would consider moving back depending on what the children end up doing in the future.

**Respondent 9:**

An Australian in the real estate industry who migrated to Hong Kong, who originally migrated based on business decisions but decided to stay due to the lifestyle and culture. He considered many nations in the APAC region but ultimately chose Hong Kong as it brought him the most benefits and provided him with the best lifestyle. He bought his total tax rate down to below 20% from over 40%, which was an added benefit. He is completely satisfied with his migration and will never return to Australia.

**Respondent 10:**

A Canadian who migrated to Spain, who migrated due to his Spanish descent and wanting to live in a more affordable region with milder temperatures during the winter months during his retirement. He considered a few other Mediterranean countries but ultimately decided on Spain due to there being fewer barriers with their non-habitual tax program and because of his Spanish ancestry. Because he is retired, he had a rather manageable tax rate previously which has now been cut in half, although he is still required to pay withholdings on the income he earns in Canada. He is satisfied with his move and would not change anything about the process.

**Key Takeaways:**

After reviewing the survey data and reaching back out to confirm and clarify certain details and statements, I have come up with a summary of the takeaways and have ranked them in order below:

- 1) The majority of respondents made their initial migration decision based on personal, lifestyle, or employment, with lower tax rates being a secondary driver or benefit.
- 2) Many of the respondents chose locations that were close to their original residences as they were more familiar and had fewer barriers to entry while also allowing them to return home easier if necessary.
- 3) Every respondent lowered their tax rate by leaving a Western or Scandinavian country in choice for a more favorable destination to them.
- 4) Some respondents could have lowered their tax rates further but chose destinations that were more favorable to them and were happy paying taxes as long as they experienced a better lifestyle.

## 4.2 Interview Questions and Answers

6 Transfer Agents from various fields and regions were chosen to interview based on their unique expertise in the field of helping people migrate from high to low tax jurisdictions while providing legal and tax services for them to streamline the process. Each transfer agent selected has been in business for over ten years, which qualifies them as an expert in regard to the services they provide. The goal of the interviews was to gain primary data and insights into the tax-based migration process and the driving factors behind the migration decision. The participants were kept anonymous and, for the purpose of this study, have been coded as Transfer Agents A-F. Below is a summary of the results the surveys have uncovered:

### **Demographics:**

The first section of questions asked to the transfer agents were demographic in nature to provide us with insights into who was migrating from high to low tax countries. Transfer Agents A-F all noted that the majority of clients are male, with the occasional Female as part of a family who was migrating, and when asked for specifics, they noted that if they had to put it in percentage terms, 95% would be Male and 5% Female. Out of those, the transfer agents also stated that 75% of their clients were Single or Divorced and 25% Married, with the majority of the married clients having children and some of the other clients having them as well. Of the ones that had children, the majority of the children were adults and thus were not migrating with the clients; in situations where the children were school-aged, they generally migrated with the clients unless there were other factors preventing them from doing so, such as custody agreements. Transfer Agents A, D, E, and F noted that the average age of their clients is between the ages of 50-70, while Transfer Agents B and C's clients are generally younger in their 30's through the early 40s. Transfer Agents A-F all noted that the majority of their clients had net worth's in the 7-8 figure range and came from high-paying industries. Transfer Agents B & C also noted that they worked with less wealthy individuals occasionally due to unique circumstances such as work transfers or retirement.

**Income sources and employment types:**

In this section, I explore how the clients earn their money and how that allows them the ability to migrate to the jurisdiction of their choice while paying for the pricey services of transfer agents. Transfer agents A-F concluded that nearly 80% of their clients were self-employed or independently wealthy, with the rest being either retired or employed in highly skilled industries such as IT, Law, or Finance, with the caveat being that 99% of their clients having multiple streams of income. The Transfer agents noted that more recent exceptions to this had been Cryptocurrency investors, Digital nomads, and Gamblers. They also noted that the younger generation is much more mobile, almost always had fewer physical ties to location, and were more likely to have online businesses. Transfer Agents B & C noted that they worked with a large amount of tech and investment savvy individuals and individuals who are multilingual and found them more mobile than others. The most common sources of income for Transfer agents E & F were business and investment income while also saying that their client's business income sources were becoming more location independent in the last decade. Transfer Agents A-D confirmed this and said that advancements in technology and social media had increased the amount of online business they have helped their clients with.

**Barriers:**

The next section aims to explore the barriers individuals face when trying to migrate from a high to a low-tax country. Transfer Agents A-F agreed that the most common barriers to tax-based migration were exit taxes, clients having to cut their primary and secondary ties to their home country, and the willingness of the clients to live in a new country. The transfer agents also noted that the government consistently tries to impose frictions such as having to sever ties to the country the clients are leaving, unnecessary and lengthy paperwork process which can drag on for months while waiting for replies, exit taxes, or disposal of assets which trigger a large taxable event at the time of migration and in the case of the United States tax by citizenship. Transfer agents B & C added that some countries were purposefully making things repetitive or slow, adding additional steps on a yearly basis, as well as making forms challenging to navigate through. Additionally, all of the transfer agents agreed that they saw governments cutting services related to migration during the COVID-19 Pandemic, which further slowed the normal process down. When asked if some jurisdictions were easier to migrate to than others, the consensus was that naturally, certain places would

be easier for some than others, but easiest does not always equate to the best possible outcome for the individual.

### **Transfer Agent specific:**

In this section, I asked the transfer agents questions specifically about them and their work to gain more industry insights into how they facilitate migration. When asked what their profession was, Transfer Agents A-C noted that they were lawyers, and Transfer Agents D-F stated that they were accountants. All of the Transfer agents noted that they had contacts in multiple jurisdictions, and when asked if accountants, in general, had a wide or a narrow portfolio of possible lox-tax domiciles, the group came to the consensus that they had a wide verity of options with a narrow selection of preferences. Transfer agents A-C noted that they bill clients by the hour while Transfer Agents D-F charged a flat fee for their services. When asked if their clients ever wanted a reversal of services, all of the Transfer Agents agreed that this was a common occurrence and was generally easier to accomplish than the original migration with some unique exceptions, such as clients who renounced their citizenships during the initial process. Lastly, when asked why some clients chose to move back home reversing their migration, the Transfer Agents stated that the most common reasons were that they were homesick or could not integrate into the new location, which is in stark contrast to the reasons they gave for leaving in the first place which was noted as being freedom, a better quality of life, living out their dreams, friendly tax policies and a lack of faith in the country of origin and its government.

### **Jurisdictional:**

In this section, I asked the transfer agents questions relating to the different low tax jurisdictions that people often migrate to in hopes of gaining insights into how they operate related to incoming tax-based migration. When asked if the different low tax jurisdictions compete with one and other based on personal income tax rates, the consensus among Transfer Agents A-F was that they do not directly compete with each other as income tax is only one part of the migration equation, although if someone has narrowed it down to a few places that have ticked all the other box's it could potentially sway a client in their direction if they had the lowest rate. When further probing to seek out examples of what different tax rates would be for individuals migrating from one country to another, the Transfer Agents noted that it would be different individuals would have different results and have tax plans



put together based solely on their needs which meant two different people could migrate from one country to the next and achieve completely different before and after-tax rates depending on the individuals' situations and their sources of income. When discussing If individuals migrating to different low tax jurisdictions had to change their residency or citizenship, the Transfer Agents noted that this was again unique to each case but that at minimum, a residency requirement would have to be met to see tax benefits and on occasion, citizenship would have to be acquired, but that is optional the majority of the time. When asking if the new expats get treated differently in regard to taxation after they migrated, the Transfer Agents mentioned that it was common for expats to receive preferential tax treatment in many countries as a way of enticing them to bring their wealth to those countries such as territorial tax agreements, non-habitual tax incentives, and lump-sum tax agreements. When discussing if expats were competitive in the local job markets of the new jurisdictions, the consensus among the Transfer Agents was that experienced individuals in in-demand sectors would have no problem finding employment and usually move with a job offer in an area such as IT, Finance, Law & specialized trades. They also noted after being asked about caps on foreign workers that their generally no hard caps on the numbers of foreign workers who can work in these jurisdictions; there are only so many highly skilled jobs available, and therefore its usually better to migrate with a job offer if you are moving in search of work. Lastly, when asked what taxes are most concerning for foreigners in their home countries vs. in their destination countries, the Transfer Agents agreed that the most common taxes their clients were concerned with were: Income tax, Inheritance tax, Corporate tax, and Capital Gains tax.

### **Drivers of Migration:**

In the last section of questions from the interview, I asked questions to gain insights into why the Transfer Agents clients made the decision to migrate from their high tax countries to low tax jurisdictions and what the driving factors were behind their decisions. I started by asking the Transfer Agents if tax was the main motivation behind their clients migrating to low tax jurisdiction, and the commonly agreed answer among them was that it was not the main motivation for the vast majority of their clients, but it did play a factor in every migration decision. I followed this up by asking how big of a factor lifestyle is in the decision to migrate, and the consensus answer was that lifestyle is one of the biggest factors that their clients make if not the number 1 factor as every client is looking to achieve a better lifestyle for themselves in the process of their migration. I then asked if the migration

decisions structured around retirement, and the Transfer Agents stated that it is very common for someone to move to a lower cost of living country in retirement, retirees most commonly move to countries that are generally more tropical from colder climates, and although not every one of their clients moves to retire, retirement and its implications is something they discuss and plan for with all of their clients. I followed this up by asking the Transfer Agents how much inheritance play a role in the decision to migrate for families, and they respond in unison by stating that it almost always matters if the home country has an inheritance tax and also matters to individuals without families who need to leave their money to someone or are expecting an inheritance from their parents or other family members. They also touched on the fact that many clients more to certain jurisdictions to make passing their family members more straightforward and that they don't feel that their home countries deserve to take any of their assets after they pass away. I then asked the Transfer Agents if there are better opportunities in the lower tax jurisdictions or if their clients generally felt like there are better opportunities away from their home countries. They responded by stating that there are opportunities and depending on the situation, there are better ones, they always look for what is best for the client's unique situation, and each situation is unique as well as each client's opinion of what is better for them but also noted that clients are always looking for what is better for them and would migrate anywhere if it would put them in a worse situation. I followed that up by asking what some of the main complaints that they heard from their clients were, to which the Transfer Agents responded that the main things their clients complain about to them were missing home or common things from home, high taxes in the home country and that it's hard to adapt to change and integrated into the new country. Lastly, I touched on healthcare and asked them how much of a role it plays in the migration decision to which they stated that it played a much larger role in the decision-making process for the older clients than the younger, but that health care is generally to the same standard everywhere if you can pay for it.

### 4.3 Research Question 1

Research question 1 What are the main drivers of taxed-based migration that cause individuals to leave higher-taxed Western and Scandinavian countries and migrate to lower-taxed jurisdictions? It was designed to uncover what drove individuals in higher-taxed

countries in the Western world as well as Scandinavia to leave home and migrate to a lower-taxed jurisdiction.

After testing the hypotheses, certain patterns became clear, and the results of the tests were measured and defined, resulting in the following data points:

90% of survey respondents listed a reason other than tax or tax rates as their reason behind their migration, and this was further backed up when interviewing the Transfer Agents who all agreed that tax was not the main factor in their client's migration decision while stating it did, however, play a factor in the decision.

After comparing the data collected from both the interviews and surveys, the three most common factors stated for making migration decisions from high to low tax jurisdictions were lifestyle, retirement, and employment.

The majority of the individuals who migrate from high to low tax jurisdictions are on average wealthier than average males over the age of 50, with roughly half of them being married. Even though respondents could have lowered their taxes or cost of living more significantly by migrating to other locations, they were more concerned about their lifestyle, standard of living, and similarities to their homeland than achieving the lowest tax rate possible.

Only one respondent surveyed alluded to "being tired of paying more taxes than they have to," and no one alluded to moving to a lower tax jurisdiction to grow their businesses unburdened by taxes. When interviewed, the Transfer Agents mentioned that high taxes in one's home country was a commonly heard complaint but again not the most common reason their clients migrate.

Wealthy families were generally more selective and based their migration decisions partially on whether or not countries had an inheritance tax when making their migration decisions when children were in the picture.

It is also important when explaining these results that the most common Jurisdictions mentioned in the surveys and alluded to in the interviews are very expensive locations to live in. They have higher than average costs of living, additional value-added taxes, and sometimes come with requirements to purchase real estate, government bonds, visas costing upwards of \$50,000 USD of making investments in the millions. This in itself creates a bias,

as mentioned above, that the majority of people migrating to these places are either wealthy individuals or highly paid employees. This has been discussed in papers before such as "Taxation and international migration of superstars: Evidence from the European football market," where the paper shows evidence to support that highly paid Football superstars were resistant to moving to higher-taxed jurisdictions and, more commonly to be found in jurisdictions with lower taxes (Kleven et al., 2013).

Stating that, the results of the study clearly show that the main drivers of taxed-based migration are personal reasons such as lifestyle, retirement choices, and employment decisions. This is similar to the results found by Carling and Collins (2018). They stated that migration possibilities are often conceptualized by an individual as "migration aspirations" where they convince themselves that it is better for them to leave and go somewhere else and that socio-economic factors were generally viewed as the main driver of migration (Carling and Collins, 2018).

## 4.4 Research Question 2

Research question 2 Will there will be an increased demand for residency in lower tax jurisdictions in the future? It was designed to be forward-looking and assumed that in the future, with the current trends being that tax rates are rising and will most likely continue to rise, the ability to acquire residency in another jurisdiction that has lower rates of tax will become extremely valuable much like a commodity.

Looking at the information gathered from the surveys and interviews, it is clear that everyone who migrated from high to low tax jurisdictions ended up paying fewer taxes and thus captured more value. This was visible in the surveys when respondents were asked what their pre and post-migration tax rates were; this was also backed up when having candid conversations with the Transfer Agents during the interview process when discussing how they add value to their client's migration process and the value of the tax savings. Article by EY Global titled: "How tax will play a role as the world strives for stability in 2021" also touches on how governments globally will advance their administration of taxes in the coming years and crackdown on enforcement as well as digital taxation (EY, 2021). Based on this, it is clear that the value of tax residency in low-tax jurisdictions will increase due to an increase in cost savings for individuals who obtain residency permits. Lastly, with freedom of movement being decreased due to restrictions put in place due to the Covid-19

Pandemic, everyone interviewed agreed that it was valuable to have a "Plan B" or place to escape to, and this has been noted previously in literature by Harpaz. In a 2019 study conducted titled "Compensatory citizenship: dual nationality as a strategy of global upward mobility," he alludes to the fact that a second citizenship often acts as a "compensatory citizenship" that improves upon the shortcomings and restrictions of one's primary resident citizenship (Harpaz,2019).

Based on the data collected in the interviews and surveys, as well as the readily available secondary data, there is a strong case that there will be an increased demand for residency in lower tax jurisdictions from individuals in economies with high tax rates.

## 5. Discussion

This Section of the Study provides an overview of the Study, underscoring its objective, the methods used to conduct the research, and the conclusions drawn from the research questions. Also, there will be a brief discussion touching on the challenges that were faced when conducting the study, the techniques that worked best when collecting data, a brief note on the sample size, and some recommendations for future research on the topic.

### 5.1 Overview of the Study

The purpose of this study was to identify the key driving forces of tax-based migration as well as to investigate the role these forces play in determining migration choices before highlighting distinct patterns and sorting them into select groupings. The study also sought to look forward to determine if there will be an increased demand for residency in low tax jurisdictions in economies with high tax rates. Both tax theory and migration theory were used as a framework to guide this study. The interview guide and surveys I chose to use were adapted from a study by Kathleen J. Marino (2012) that focused on exploring faculty perception and adaptation of social presence in a qualitative manner. I altered the structure of the survey and interview guide to better suit the type of research that was being conducted.

While conducting the research for this Study, I aimed to answer two basic research questions, the first being: What are the main drivers of taxed-based migration that cause individuals to leave higher-taxed Western and Scandinavian countries and migrate to lower-taxed jurisdictions? Which was backed up by subsectional questions related to geographics, income sources & employment types, barriers, Transfer Agent specific questions, jurisdictional questions, and questions related to drivers of migration. The second research question that I looked to answer was: Will there will be an increased demand for residency in lower tax jurisdictions in the future? While, like the first research question, this was explicitly asked when conducting the interviews, this research question was much more opinion-based while supported in the findings by patterns that were shown and earlier findings drawn from secondary literature.

Interviews were conducted with Transfer Agents through online platforms, and survey participants were e-mailed a link to an online survey. Once the data had been collected and analyzed, participants were contacted again through similar methods to enable them to add to their original answers, provide color on certain findings and directly comment on the research questions. Out of all the participants, over 90% added additional information to their answers and provided a more concise opinion on the research topics, while a single respondent had time to provide brief comments on the research questions. The data was then collected again, analyzed, and presented in the findings section of the Study.

## 5.2 Implications

When I entered this study, I had hypotheses that the majority of individuals that migrated from high to low tax jurisdictions were only doing so to lower their tax rates. My opinion was based on the literature that was readily available to most of it concerning "Tax Havens," "Tax Avoidance," and "Tax Secrecy" and the portrait of individuals who move their money or relocate offshore in the media. What I found instead was that the majority of individuals moving to these jurisdictions were motivated by lifestyle choices just like any other individual would be moving abroad. I feel like this has great implications for other studies that consider the migration of wealthy individuals as it adds another dimension to the research and should be considered. Much of the literature and research conducted on the topic of tax is quantitative and addresses the number of people migrating, how much their worth, and the net loss in tax revenues due to migration or offshoring. But these studies do not ask the most important question, that being: "Why are they leaving?". Rather they imply the individuals are leaving to avoid paying tax, looking at the individuals as data points or tax revenue instead of people. Addressing the "why" in further studies could help tax centers and individuals uncover the reasons that drive the migration outflows of wealthy individuals and help shape policy to entice them to stay instead, allowing them to retain the tax revenue.

## 5.3 Results

The findings of the study are presented in the following construct: 1 who is migrating from high to low tax jurisdictions, two where are they migrating to, and 3 when are they migrating. The results also highlight the three main drivers of taxed-based migration that cause individuals to leave higher-taxed Western and Scandinavian countries and migrate to lower-taxed jurisdictions, as well as why there will be an increase in demand for residency in low-tax jurisdictions. The results will present both qualitative findings and quantitative findings based on the qualitative research.

### **Who is migrating from high to low tax jurisdictions**

Based on the findings from the surveys and interviews, we can conclusively say that the profile of the average individual migrating from high to low tax jurisdictions is a man who is either a wealthy individual or high skilled worker who is over the age of 50 with a 25% chance of being married or retired. These individuals generally had net worth's in the 7-8 figure range, and 80% of the time were self-employed in high-paying industries. Occasionally there were younger migrants who mostly migrated due to employment in highly skilled positions such as IT, Law, or Finance, as well as alternative industries such as crypto-currencies, digital nomads related to freelancing, and professional gambling. The younger migrants were generally more mobile as they did not have as many ties to their home countries as their older counterparts.

### **Where are individuals choosing to migrate**

Throughout the Study, many patterns were uncovered as to preferences for low tax migration destinations, those included: 90% of respondents to the online survey relocated to a more temperate or tropical climate, with the other 10% staying in a similar climate, this was backed up by interviews with the Transfer Agents that suggested that most clients sought out an ideal environment or beach retirement. Individuals also generally stuck to their own regions more than 75% of the time, with the other 25% relocating to other continents due to specific personal reasons such as employment, family ties, or governmental restrictions. On



a more specific note, Europeans generally preferred to migrate to Monaco, Switzerland, and Malta as well as, on occasion, British Overseas Territories. Those from North America preferred the Caribbean Islands or Europe if there were personal or ancestral ties, and lastly, Australians and South Africans were viewed as showing preference to the Asian region due to the amply available residency schemes.

### **When are individuals making their migration decisions**

Individuals are generally migrating at two different stages of their lives, with the majority migrating in their later years when they are already independently wealthy or retired and searching for some better. The minority migrates when they are younger due to limitations, employment, freedom, and alternative life choices.

### **Why there will be an increased demand for residency in lower tax jurisdictions in the future**

There will be an increase in demand for residency in lower tax jurisdictions in the future as it offers individuals more freedom and value. The freedom to make their own choices, determine their own values and how they wish to be governed, as well as additional freedoms related to movement, which are becoming more and more desirable during the current global climate. Additionally, it provides them with additional value when measuring pure cost savings related to taxation and the effect that that can have on enhancing the individual's standard of living, retirement, or lifestyle in general.

## **5.4 Challenges**

In this subsection, we will discuss two different types of challenges; firstly, the challenges individuals face when making migration choices that incorporate tax strategies, and secondly, the challenges that were faced while conducting this study.

Firstly, individuals searching to migrate and incorporate tax strategies face an uphill battle with many obstacles to overcome, such as:

1. The limitations put in place by governments to either impede or allow them to migrate to certain places based on their current nationality.

2. The cost of migrating to lower tax jurisdictions which can range from the tens of thousands if using a Transfer Agent to the millions depending on if the new jurisdiction has a land acquisition requirement.
3. The lack of freely available information on the choices available to individuals to help them make an educated migration decision on their own without having to hire professionals such as lawyers and accountants.
4. The bureaucratic friction that governments impose to slow down and limit their citizens from migrating away from their countries, such as endless amounts of paperwork and forms, additional departure taxes, and waiting periods for renunciation of citizenships.

Sadly, enough these challenges are, for the most part, unavoidable, and the only way to circumnavigate them is to spend a significant amount of time and money on consulting services to plan everything out before beginning the process.

Lastly, I faced a multitude of challenges when conducting this study, including but not limited to:

1. The impact of the COVID-19 Pandemic on the ability to meet with, interview, and interact with individuals in a group setting which narrowed the scope of research as well as slowed the process down significantly. This compounded with the fact that while completing this Study, I was based out of Toronto, Canada, which has been in lockdown for the better part of the past 14 months, which externally influenced my ability to conduct the Study efficiently.
2. The lack of transparency and availability of individuals in the Transfer Agent industry. This posed a challenge when it came to finding suitable experts to interview for the Study and resulted in me having to rely on referrals and colleagues referrals to locate candidates, which in turn slowed down my ability to conduct the Study.

## 5.5 Techniques that Worked Best

The ability to use video conferencing software to conduct online interviews rather than conducting in-person interviews was invaluable when it came to interviewing multiple participants in a variety of regions and time zones when travel was restricted. It provided the ability to gather instant feedback while allowing the Study to proceed without the immense expense that would have been incurred traveling to the participants for traditional interviews.

Likewise, the use of online surveys was crucial to gathering data under time constraints as it allowed for the measurement and comparison of results in real-time by leveraging the software provided by google forms.

Lastly, the Delphi Method proved to be a very successful method at cracking the surface and gathering more in-depth data from the participants, and for forming concise opinions among the groups of Transfer Agents and survey respondents. With the majority of the data coming from the second round of interviews and follow-up phone calls I conducted, the participants seemed more open to speaking freely and were happy to share more information based on the conclusions of the initial research data.

## 5.6 Recommendations for Future Research

The following areas can be studied to advance the knowledge of tax-based migration using future research.

1. The Study needs to be replicated using a larger sample size and with additional rounds of questions. Doing so would remove the unintentional biases and variance that come with a smaller sample size and give the researcher a greater picture of why individuals make tax-based migration decisions.
2. An area of future Study could look at each individual Western or Scandinavian country and the drivers behind their decisions to migrate to lower tax jurisdictions. This would provide the researcher with more country-

specific knowledge that could prove valuable for tax centers or governments when determining why there are migration outflows from their country.

3. A study should examine the disparity between the number of men and women that migrate from higher to lower tax jurisdictions and vice versa as well reasons behind the migrations. This would highlight the role gender plays in the migration decision-making process and could address some issues such as wage disparity, cultural norms, and psychological factors.

By incorporating new and existing was of examining the data as well as viewing the problem as "why are people migrating from high to low tax jurisdictions" rather than "people are migrating from high to low tax jurisdictions" I believe there is an infinite amount of beneficial research that can be conducted in the future related to tax-based migration.

## 6. Conclusion

This study was aimed at uncovering the main drivers behind tax-based migration from high to low tax jurisdictions and if there would be an increased demand for residency in those low tax jurisdictions. A sample of transfer agents and the individuals they helped during their migration process was selected to represent Western and Scandinavian countries or "high-tax Jurisdictions." The sample was skewed, representing Western countries slightly more than their Scandinavian counterparts due to COVID-19 geographic restrictions.

In the initial stages of the study, a review of the current literature on the topic was conducted before forming hypotheses for the research questions. After that, I began to collect data by sending out online surveys to individuals and conducting open-ended interviews with the transfer agents. The results were then compared to identify patterns and well ask unique data points.

I then utilized the Delphi method to interview the sample a second time with the goal of clarifying discrepancies and uncovering additional information that may have been omitted during the initial stages of the data collection. Once the second round was completed, everything was transcribed, audited, and compared to eliminate variances and highlight key data points. After this, an analysis of the data was conducted to test the hypotheses and draw conclusions.

The analysis has shown that the main drivers of tax-based migration are lifestyle choices, personal and family ties, employment, retirement decisions, as well as certain tax-based strategies. But primarily, the participants noted that the main drivers that drove the migration were purely functions of individuals seeking to improve their standard of living for themselves and their families. The research also suggested that there will be an increased demand for residency in low tax jurisdictions as there is a direct correlation between that and raising tax rates, which is the type of tax environment we are in currently.

In Conclusion, the empirical evidence suggests that while the main drivers of the migration are generally ideologically driven, tax benefits or breaks serve as a secondary driver that provides additional incentives to the individual when making a migration decision and often ends up serving as a tiebreaker when the individual is having trouble making a decision.

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Appendix A  
Interview Questions Guide

<b>Interview Guide Questions</b>
<b>Demographics</b>
1 Are the majority of your clients Male or Female?
2 Could you estimate a ball park percentage of your clients based on gender?
3 Are clients mainly Single or Married?
4 Do the clients have children?
5 Do the children generally migrate with them?
6 What age bracket would you place the majority of your clients in? Ie 20s, 30s, 40s, 50s,60s, 70+
7 What is the average income and net worth of your clients?
8 Do clients with average or lower incomes approach you?
<b>Income Source &amp; Employment Types</b>
1 Are your clients generally employed, self employed, business owners, investors or other?
2 If other could you specify?
3 Who is the most mobile?
4 What types of skilled labor are moving?
5 Which skill sets are most mobile?
6 Do you clients have multipul income sources?
7 Can you outline the most common Income Sources?
8 Are those income sources tied to a location or are they mobile?
<b>Barriers</b>
1 What are the most common barriers to tax based migration?
2 What are the typical barriers imposed by the government to make mobility imperfect?
3 How does the government create frictions in mobility?
4 Are some places easier to migrate to/from then others?
<b>Transfer Agent</b>
1 What is the nature of your business eg: top 4, consulting company, or law firm?
2 Do you have contacts in more than a couple of low-tax jurisdiction?
3 Should we think of accountants as having a wide or a narrow portfolio of possible lox-tax domiciles?
4 How are you compensated?
5 Has it happened that people wanted reversals of service?
6 What reasons were given?
<b>Jurisdictional</b>
1 Are low tax jurisdictions in competition based on personal income tax rates?
2 For example: A canadian moving to Bermuda - from what tax rate to what tax rate does he move?
3 Does he change residency or citizenship?
4 Does the expat get treated differently than natives in in terms of rights or taxes?
5 Are the expats competitive in the new domestic labor market - e.g. IT professionals can try to acquire local jobs
6 Are certain skills in higher demand / easier to transfer?
7 What taxes are most concerning for foreigners in their home countries vs in their destination countries?
8 Can the lower tax jurisdictions absorb an unlimited surplus of skilled labor or are there some restrictions/caps to migration rates?
<b>Drivers of Migration</b>
1 Is tax the main motive for migrating to a lower tax jurisdiction?
2 how big a factor is lifestyle?
3 Is this decision structured around retirement?
4 How much does inheritance play a role in the decision to migrate for families?
5 Are their better opportunities or do clients generally feel like there are better opportunities away from their home country?
6 What are some of the largest complinats you hear from clients?
7 How much does healthcare play into the Migration decision and for what demographics?

Appendix B

Online Survey

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## Migration Experience Survey

A survey designed to gain insights from your experience migrating from a high-tax jurisdiction to a low-tax jurisdiction.

1. Participant Number

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2. What is your occupation or source of income?

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3. Where did you originally migrate from?

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4. Where did you end up?

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5. What were the main factors that contributed to your decision to move?

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6. Did you consider multiple places before moving?

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