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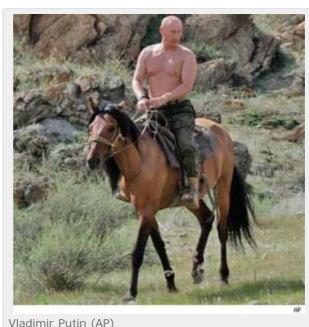
## Robert W. Wood THE TAX LAWYER

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## Putin's Tax Ploy: Give Us Your Wealthy, Your Actors, Your Fed-up

"Give me your tired, your poor, your huddled masses," may be the entrée to the Statue of Liberty, but Russia's version could be, "Give us your rich, your fed-up, your supremely mobile." Vladimir Putin's Russia could be poised to become a unique tax haven that's big, powerful and can flaunt rules when it wants.

Weak countries that worry about FATCA compliance? Pish-tosh. Besides, Russia's



flat 13% tax rate sounds better than Singapore's 18%, which Facebook's Eduardo Saverin now calls home. See Why Denise Rich Followed Eduardo Saverin's Expat Lead. Mr. Putin embraced the previously French best-known actor **Gérard Depardieu** with a bear hug.

A 75% tax too much for the actor? Russia's 13% looks positively svelte. Mr. Depardieu's enough's-enough campaign against French Socialists made Mr. Putin positively giddy. Mr. Putin granted Mr. Depardieu's citizenship request, rolling out the red carpet. Belgium, an also-ran, must have looked like the gulag.

The Kremlin can tout its 13% income-tax rate not only to bait other fedup foreigners, but to lure famously non-compliant Russians to pay their taxes too. See what a good deal it is to pay tax in Russia, Mr. Depardieu's visit seemed to proclaim? See <u>French Actor Depardieu Gets Russian</u> <u>Passport</u>.

France's meteoric tax rate was struck down but it's clear the 75% rate will be back soon. See No Deal, So Cliff Taxes Rise But Millionaire Tax Held Unconstitutional. Besides, the prior 45% rate already dwarfs Russia's 13%. Mr. Depardieu now age 64 claims to have paid €145 million (\$190 million) in taxes to France and was nonplussed when Prime Minister Jean-Marc Ayrault labeled him "pathetic" and "unpatriotic."

Mr. Depardieu was not alone. LVMH's Bernard Arnault applied for Belgian nationality, prompting the headline, "Get Lost, You Rich Bastard." Yet voting with one's feet is a global trend. See If U.S. Had 75% Tax Rate, You'd Leave Too. In Britain, the number of £1 million a year taxpayers fell by over 60% in one year alone. See Britain's Missing Millionaires: Income tax Rates Rise but Revenues Fall. Americans too have looked for greener pastures given our controversial worldwide income tax system. See Expats Lobby For Tax on Residence, Not Worldwide Income.

Eduardo Saverin fled to tax-friendly Singapore on the heels of Facebook's IPO. See Why Facebook's Co-Founder Just Defriended America. There is already a U.S. exit tax on giving up citizenship, and it can apply to a Green Card too. See High Cost To Go Green: Giving Up A Green Card. Mr. Saverin's exit triggered an even higher exit tax proposal.

Given America's complex tax system and exit tax, anyone testing the water needs thoughtful planning and careful advice. Meanwhile, I'm betting that Mr. Putin's Russia is gearing up for a new kind of business. See <u>Brigitte Bardot threatens to spurn France</u>, <u>embrace Russia</u>.

Robert W. Wood practices law with <u>Wood LLP</u>, in San Francisco. The author of more than 30 books, including Taxation of Damage Awards & Settlement Payments (4th Ed. 2009 with 2012 Supplement, <u>Tax</u> <u>Institute</u>), he can be reached at <u>Wood@WoodLLP.com</u>. This discussion is not intended as legal advice, and cannot be relied upon for any purpose without the services of a qualified professional.