



# TAXES, MOBILITY, FREEDOM

September 26th 2025

#### **About Derren**

#### **Education Summary**

- Completed the Comparative Tax Program at Harvard University.
- Enrolled Agent (EA) with authorization to represent taxpayers before the IRS across all 50 states and internationally.
- Holds two Master's Degrees in Economics and a Certified Diploma from the Association of Chartered Certified Accountants (ACCA), UK.
- Executive Education at Columbia Business School and Advanced Tax coursework at New York University and the University of London.

#### **Career Summary**

- Chair of the Tax Working Group for Moores Rowland in the Asia Pacific, overseeing 23 countries.
- Member of the Global Leadership Committee of the International Business Structuring Association (IBSA).
- Member of Briefing Group advising the Lord Mayor of London on international tax issues.
- Board of Advisors, Caribbean Chamber of Commerce in Europe
- Board of Advisors, American social media company called Vlogmi Al.
- Published three books on taxation, including an Amazon Best Seller in 2020.



#### **Outline**

- 1. Research on Mobility
- 2. The Internet Democratized Mobility
- 3. Wealthy still concentrated in Wealthy countries
- 4. Freedom Transnational Living



|                  | 2025 F                | 2025 Provisional Wealth Flows Milliona              |                         |
|------------------|-----------------------|---|-------------------------|
| Country $\nabla$ | Millionaire Migration | Estimated Wealth of Migrating Millionaires (USD bn) | (2014 to 2024) $\nabla$ |
| C UAE            | +9,800                | 63.0  | 98%                     |
| <b>USA</b>       | +7,500                | 43.7  | 78%                     |
| ( ) Italy        | +3,600                | 20.7  | 20%                     |
| ♣ Switzerland    | +3,000                | 16.8  | 28%                     |
| Saudi Arabia     | +2,400                | 18.4  | 55%                     |
| Singapore        | +1,600                | 8.9   | 62%                     |
| Portugal         | +1,400                | 8.1   | 38%                     |
| Greece           | +1,200                | 7.7   |                         |



| ( Canada                 | +1,000 | 5.7  | 26% |
|--------------------------|--------|------|-----|
| Australia                | +1,000 | 5.6  | 30% |
| Hong Kong<br>(SAR China) | +800   | 5.3  | 3%  |
| <ul><li>Japan</li></ul>  | +600   | 3.1  | 5%  |
| * Malta                  | +500   | 4.3  | 87% |
| Thailand                 | +450   | 4.2  | 50% |
| Costa Rica               | +350   | 2.8  | 72% |
| Panama                   | +300   | 2.4  | 69% |
| € Cyprus                 | +250   | 2.6  | 33% |
| Monaco                   | +200   | 11.0 | 58% |
| Cayman Islands           | +200   | 3.7  |     |



| New Zealand | +150 | 0.9 | 30%  |
|-------------|------|-----|------|
| Montenegro  | +150 | 1.6 | 124% |
| Netherlands | +100 | 0.6 | 31%  |
| Latvia      | +100 | 0.6 | 70%  |
| Morocco     | +100 | 0.9 | 36%  |
| Mauritius   | +100 | 0.5 | 63%  |
| Austria     | +50  | 0.3 | 18%  |
| Croatia     | +50  | 0.4 | 64%  |
| Bermuda     | +50  | 1.0 | 51%  |
| Belgium     | +50  | 0.3 | 14%  |
| Hungary     | +50  | 0.3 |      |
| Sevchelles  | +50  | 1.0 | 35%  |



| Sweden                     | -50  | 0.4 | 4%   |
|----------------------------|------|-----|------|
| Philippines                | -50  | 0.6 | 32%  |
| Angola                     | -50  | 0.3 | -36% |
| Türkiye                    | -100 | 0.8 | -28% |
| Taiwan (Chinese<br>Taipei) | -100 | 0.7 | 65%  |
| Ireland                    | -100 | 0.6 | 40%  |
| Argentina                  | -100 | 0.7 | -25% |
| <b>©</b> Pakistan          | -100 | 0.5 | -30% |
| Egypt                      | -100 | 0.8 | -20% |
| Norway                     | -150 | 1.0 | -4%  |
| Mexico                     | -150 | 1.0 |      |



| _               |      |     |      |
|-----------------|------|-----|------|
| Colombia        | -150 | 1.0 | -15% |
| Lebanon         | -200 | 2.8 | -60% |
| <b>⊉</b> Iran   | -200 | 1.5 | -21% |
| Nigeria Nigeria | -200 | 1.5 | -53% |
| Indonesia       | -250 | 3.0 | 42%  |
| South Africa    | -250 | 1.6 | -12% |
| ★ Vietnam       | -300 | 2.8 | 65%  |
| <b>❖</b> Israel | -350 | 2.5 | 35%  |
| Germany         | -400 | 2.2 | 10%  |
| Spain Spain     | -500 | 3.1 |      |



| Spain                 | -500    | 3.1  | 3%   |
|-----------------------|---------|------|------|
| France                | -800    | 4.4  | 7%   |
| Brazil                | -1,200  | 8.4  | -18% |
| Russian<br>Federation | -1,500  | 14.7 | -25% |
| South Korea           | -2,400  | 15.2 | 17%  |
| India                 | -3,500  | 26.2 | 72%  |
| China                 | -7,800  | 55.9 | 74%  |
| <b>₩</b> UK           | -16,500 | 91.8 | -9%  |



- Henley and Partners
- There have been a number of high-profile exits
  - Lakshmi Mittal, the Indian-born founder of ArcelorMittal and Britain's seventh wealthiest man
  - Nassef Sawiris, Egypt's richest person
  - Richard Nodie, the South African-born vice chairman of Goldman Sachs International
  - Anne Beaufor, the Sanofi heiress
- Dan Neidle of Tax Policy Associates report was riddled with statistical red flags



- Does Income Tax Affect Interstate migration? Martin A Sullivan Posted on Tax Notes on AUG. 26, 2024
  - Tax has a marginal impact
- Taxation and Migration: Evidence and Policy Implications Henrik Kleven, Camille Landais, Mathilde Muñoz, and Stefanie Stantcheva
  - Journal of Economic Perspectives—Volume 34, Number 2—Spring 2020—Pages 119–142
  - Be careful of anecdotes in the media. Also high profile groups. In general, it is more complex
- The Myth of Millionaire Tax Flight How Place Still Matters for the Rich
  - By Cristobal Young
  - Stanford University Press



#### The Internet Democratized Mobility

- Mobility is no longer limited to super rich.
- Middle Class move based on tax, lifestyle, and legal stability.
   Remote work, international schools, internet. Live abroad without severing ties to home
- Digital Nomads
- CBI and RBI programs. Plan B. New asset class.



## Wealthy Concentrated in Wealthy Countries

#### **Tracking the Millionaire Hotspots**

Henley & Partners, the source of our data, defines a millionaire as someone with liquid investable assets exceeding \$1 million, excluding real estate.

The U.S. dominates the list, taking up seven slots or nearly 30% of the top 25 cities.

| Rank | City/Area     | Country/Region | Number of Millionaires |
|------|---------------|----------------|------------------------|
| 1    | New York City | us U.S.        | 384,500                |
| 2    | The Bay Area  | us U.S.        | 342,400                |
| 3    | Tokyo         | ль Japan       | 292,300                |
| 4    | Singapore     | sg Singapore   | 242,400                |
| 5    | Los Angeles   | us U.S.        | 220,600                |
| 6    | London        | GB UK          | 215,700                |
| 7    | Paris         | FR France      | 160,100                |
| 8    | Hong Kong     | нк Hong Kong   | 154,900                |
| 9    | Sydney        | Au Australia   | 152,900                |
| 10   | Chicago       | us U.S.        | 127,100                |
|      |               |                |                        |



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| Rank | City/Area        | Country/Region | Number of Millionaires |
|------|------------------|----------------|------------------------|
| 11   | Milan            | т Italy        | 115,000                |
| 12   | Beijing          | cn China       | 114,300                |
| 13   | Osaka-Kyoto-Kobe | л Japan        | 112,200                |
| 14   | Shanghai         | cn China       | 110,500                |
| 15   | Toronto          | ca Canada      | 108,400                |
| 16   | Melbourne        | au Australia   | 94,000                 |
| 17   | Houston          | us U.S.        | 81,800                 |
| 18   | Dubai            | AE UAE         | 81,200                 |
| 19   | Frankfurt        | DE Germany     | 80,300                 |
| 20   | Zurich           | сн Switzerland | 77,800                 |



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| Rank | City/Area | Country/Region | Number of Millionaires |
|------|-----------|----------------|------------------------|
| 21   | Dallas    | us U.S.        | 72,400                 |
| 22   | Geneva    | сн Switzerland | 70,200                 |
| 23   | Munich    | DE Germany     | 69,800                 |
| 24   | Seoul     | kr South Korea | 66,000                 |
| 25   | Seattle   | us U.S.        | 53,100                 |

Showing 21 to 25 of 25 entries

Data as of December 2024 and figures rounded to the nearest 100.



Beijing, the city with the most billionaires in 2023, has not only ceded its spot to New York, but has dropped to #4, overtaken by London and Mumbai.

| Rank | City             | Billionaires | Rank Change YoY |
|------|------------------|--------------|-----------------|
| 1    | us New York      | 119          | +1              |
| 2    | GB London        | 97           | +3              |
| 3    | ıм Mumbai        | 92           | +4              |
| 4    | CN Beijing       | 91           | -3              |
| 5    | CN Shanghai      | 87           | -2              |
| 6    | CN Shenzhen      | 84           | -2              |
| 7    | нк Hong Kong     | 65           | -1              |
| 8    | RU MOSCOW        | 59           | No Change       |
| 9    | IN New Delhi     | 57           | +6              |
| 10   | us San Francisco | 52           | No Change       |
| 11   | тн Bangkok       | 49           | +2              |
| 12   | rw Taipei        | 45           | +2              |
| 13   | FR Paris         | 44           | -2              |
| 14   | cn Hangzhou      | 43           | -5              |
| 15   | sg Singapore     | 42           | New to Top 20   |
| 16   | cn Guangzhou     | 39           | -4              |
| 17T  | ID Jakarta       | 37           | +1              |
| 17T  | BR Sao Paulo     | 37           | No Change       |
| 19T  | us Los Angeles   | 31           | No Change       |
| 19T  | kr Seoul         | 31           | -3              |

In fact all Chinese cities on the top 20 list have lost billionaires between 2023-24. Consequently,

# Wealthy Concentrated in Wealthy Countries



### Freedom – Transnational Living

- Mobility is real but motives are complex
- Global trust levels are in decline, (Ivan Shkvarun published on WEF July 2025)
  - Response of the government rise of supranational surveillance in the form of exchange of information agreements – FATCA 2010, CRS 2014, CARF happening
  - Response of the governed mobility, evasion eg shell bank loophole, avoidance.
- Rise in Transnational Living Curated Portfolio. Epstein. Tax planning

