



Robert W. Wood

THE TAX LAWYER

Dec. 16 2012

Gerard Depardieu Shows Tax Exiles Can Fight Back

France's best-known actor [Gérard Depardieu](#) has generated a stir with his letter firing back at the French Prime Minister and turning in his beloved French passport. "We no longer have the same country. I'm a true European, a citizen of the world," Depardieu wrote. Given France's meteoric tax rates, he is moving to Nechin, a Belgian village just across the border from Lille, France. See [Depardieu to give up passport in tax exile row](#). A mile can make a world of difference.



Image credit: AFP/Getty Images via @daylife

The beloved actor said his 2012 tax bill – 85% of his revenue – is fully paid. That's a golden goose, not so? Turning 64, Depardieu said he's been working since age 14. In the last 45 years he claims to have paid €145 million (\$190 million) in taxes. That's a lot of baguettes.

Yet Prime Minister Jean-Marc Ayrault recently labeled Depardieu "pathetic" and "unpatriotic" for his decision. Elegantly striking back, Depardieu wrote: "I hand over my passport to you and my social security

card, which I have never used.” After France’s socialist President François Hollande proposed a 75% tax on earnings over €1 Million, France’s wealth-king Bernard Arnault [applied for Belgian nationality](#). See [If U.S. Had 75% Tax Rate, You’d Leave Too](#).

Like Depardieu, Arnault took heat, including being called a bastard. The understated newspaper headline: “[Get Lost, You Rich Bastard](#).” Yet it’s a global trend. In Britain, the number of taxpayers declaring £1 million a year in income fell by more than 60% in just one year. The explanation might be the recession, right?

Perhaps, but this happened to be the banner year millionaires faced a 50% income-tax rate up from 40% the prior year. Incredibly, the total number of millionaire tax filers plunged from 16,000 in 2009-2010 to 6,000 in 2010-2011. See [Britain’s Missing Millionaires: Income tax Rates Rise but Revenues Fall](#). And Americans too have looked for greener pastures.

Although some Americans vote with their feet, our inflow dramatically exceeds our outflow. Our worldwide income tax system is becoming more controversial, yet is unlikely to change. See [Expats Lobby For Tax on Residence, Not Worldwide Income](#). When Facebook’s Eduardo Saverin left for tax-friendly Singapore, some thought it was a great idea. See [Why Denise Rich Followed Eduardo Saverin’s Expat Lead](#).

But others became incensed. See [Why Facebook’s Co-Founder Just Defriended America](#). The Saverin move on the heels of the Facebook IPO prompted a tax bill to slap even higher taxes on those deigning to say sayonara. That ramped up U.S. exit tax has not been passed into law, but some legislators got some nice sound bytes about taxes and patriotism.

But given America’s tough and complex tax system, anyone joining Depardieu needs some tax advice and thoughtful planning. Not only is there already a U.S. exit tax on people who give up U.S. citizenship, it can apply to handing in a Green Card too. See [High Cost To Go Green: Giving Up A Green Card](#).

*Robert W. Wood practices law with [Wood LLP](#), in San Francisco. The author of more than 30 books, including *Taxation of Damage Awards & Settlement Payments* (4th Ed. 2009 with 2012 Supplement, [Tax](#)*

[Institute](mailto:Wood@WoodLLP.com)), he can be reached at Wood@WoodLLP.com. This discussion is not intended as legal advice, and cannot be relied upon for any purpose without the services of a qualified professional.