Wealth Taxation and Migration Patterns of the Wealthy

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Do the Rich Move to Avoid Wealth Taxes?

- Migration responses central to debate on desirability of wealth taxes
 - Literature on "intensive margin" responses to wealth tax (Jakobsen & al [2020])
 - Evidence on top earners migration response to tax (Kleven et al. [2020])
 - Work on *within-country* responses to wealth taxation only: Moretti & Wilson [2023], Bruhlart et al. [2022], Agrawal et al. [2023]

Do the Rich Move to Avoid Wealth Taxes?

- Migration responses central to debate on desirability of wealth taxes
- Why important
 - **①** Top earners \neq wealth holders= responsiveness to taxes?
 - **②** Wealth (stock) \neq income (flow)= avoidance strategies?
 - Wealthy entrepreneurs= economic spillovers for the economy?

Do the Rich Move to Avoid Wealth Taxes?

- Migration responses central to debate on desirability of wealth taxes
- Why important
 - **①** Top earners \neq wealth holders= responsiveness to taxes?
 - **②** Wealth (stock) \neq income (flow)= avoidance strategies?
 - Wealthy entrepreneurs= economic spillovers for the economy?
- Requires detailed data on (i) migration (ii) wealth (iii) firms' ownership + (iv) exogeneous shock in wealth taxation

This Paper: Wealth and Migration in Scandinavia Today we will mostly focus on Sweden \rightarrow Denmark used as a robustness

Who migrates at the top of wealth distribution?

- How large and how persistent?
- Who is more likely to leave?

What are the economic implications of wealthy out-migration?

- Real effects on individual-level outcomes (taxes, portfolio reallocation)
- Economic spillovers on closely-held businesses (employment, profits..)
- What is the (causal) effect of wealth taxation on migration?
 - International migration responses to repeal of the wealth tax

What are migration-induced implications of taxing wealth for the aggregate economy?



Institutional Background & Data

- 3 Migration of the Wealthy: How Big and for Whom?
- What Happens When the Wealthy Migrate?
- 5 Identifying Migration Elasticities
- Implications

Wealth Taxation in Sweden (1910-2007)

- Annual tax on the market value of net wealth of wealthy households
- Key features of the Swedish wealth tax before 2007:
 - Tax schedule:
 - 0% below exemption threshold, 1.5% MTR above Paying Wealth Tax
 - **Reporting requirements**: Third-party reporting + assessments at market values
 - Tax exemptions: real estate (25%), listed stocks (20%), assets in closely-held businesses (100%). Details
- Residence rules: wealth tax applies to Swedish tax residents
 - Non-residents liable for wealth held in Sweden
 - Owning a firm in Sweden can be sufficient to be Swedish tax resident
 - Capital gains taxable up to 10 years upon migration

Repeal of the Swedish Wealth Tax in 2007

- Swedish wealth tax: 1999-2007
 - $\bullet\,$ Wealth tax payments $\approx 1.2\%$ of total tax revenues
 - $\bullet\,$ Annual average tax of $\approx\,.5\%$ of total net wealth for the top 2%
 - Other capital incomes taxed at 30% annually
- 2007: Abolitition of wealth tax (Effective January 1st)
 - $\bullet\,$ Sharp and large decrease in MTR from 1.5% to 0.
 - Followed surprise win of the right wing coalition at the October 2006 elections

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 - $\bullet\,$ Sharp and large decrease in MTR from 1.5% to 0.
 - Followed surprise win of the right wing coalition at the October 2006 elections
- Similar reforms in Denmark (1996), France (2017)...
 - \bullet Denmark decreased top MTR from 2.2% to 1% in 1990
 - Fully repealed the wealth tax in 1996
 - We use this as "out of sample" test for the Swedish reform

Administrative Data on Wealth and Migration in Sweden

- Third-party reported information on wealth
 - Net market value of real estate, listed stocks, bank accounts, bonds...
 ⇒some info only available until 2007
 Prediction model
 - List of all housing + financial transactions
 - Shares in closely-held businesses (CHB):
 ⇒link unlisted companies to Swedish owners
 - Ownership register: all firm-to-firm ownership links + shares
 ⇒ measure both direct and indirect firm ownership
- Population registers with rich demographic & economic info
 - E.g. info on all earnings, capital income, transfers
 - E.g. detailed info on education, occupation, etc.
- Administrative international migration registers
 - Dates of entry/exit, duration of stay each year
 - Country of origin/destination

#1: Many Entrepreneurs Among the Wealthy



#2:Large Employment at Firms Held by the Wealthy



#3: Migration is Real But Sometimes Transitory





- In Migration of the Wealthy: How Big and for Whom?

Out-Migration Rates by Wealth Level: 1999-2006

Out-migrants liable to wealth tax pprox 0.1% of total net wealth $igstar{}$ Same numbers in DK



Fractile of HH Net Wealth Distribution

In-Migration Rates by Wealth Level: 1999-2006

More In-migration as well at the top Same numbers in DK



Fractile of HH Net Wealth Distribution

Net-Migration Rates by Wealth Level: 1999-2006

Small positive net migration rates ightarrow No exodus of the wealthy



Fractile of HH Net Wealth Distribution

Selection Into Out-Migration: Sweden

Linear Probability Model of Out-Migration 2001-2007

Equations



Selection Into Out-Migration: Sweden

No brain drain, but wealthy entrepreneurs 40% more likely to leave



Relative Out-Migration Probability

1 Introduction

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Effects of Out-Migration on Individual-Level Outcomes

- Focus on *all* out-migration events of wealth taxpayers (1999-2006)
 - During that period, wealth was taxed
- Individual-level outcomes before and after out-migration
 - Comparison group: wealthy staying in Sweden
 - Random allocation of placebo out-migration dates (no matching)
- Dynamic self-selection into out-migration? What happens after?

$$\underbrace{y_{it}}_{\text{Indiv. outcome}} = \sum_{\substack{j=-5\\ j\neq -1}}^{5} \beta_j \times \underbrace{1 \cdot (M_i = 1) \cdot 1(t = j)}_{\text{Migrant x time to event FE}} + \sum_j \delta_j \cdot 1(t = j) + \varepsilon_{it}$$

Treatment vs Control



Heterogeneity by CHB Ownership

a. Real Estate Transaction

b. Reporting Financial Wealth





Year Relative to Out-Migration

Year Relative to Out-Migration

2

-3 -2 -1

5

Closely-Held Businesses Owned by Wealthy Taxpayers

Smallish firms, but bigger than average unlisted firm

Variable	Mean	Median	Std. Dev.	Obs.	% of Swedish Aggregates	% of Active CHBs
		Panel /	A. All active C	<u>HBs</u>		
Nr. of Owners	1.8	1	7.1	589,788		
Nr. of Employees	8	3	40.5	589,788	13.53%	100%
Value Added (\$)	399.7k	178.5k	3,629.7k	541,097	21.84%	100%
Net Turnover (\$)	1,247.9k	456.1k	7,178.2k	541,097	17.68%	100%
Tax Payments (\$)	16.2k	2.5k	553.8k	541,097	27.64%	100%
Gross Investments (\$)	62.8k	7.4k	548.2k	541,097	17.88%	100%
Panel	B. Active Ch	IBs with at I	least one owne	r in the top 2	2% of net worth	
Nr. of Owners	2.4	2	17.9	89,485		
Nr. of Employees	14.1	4	82.3	89,485	3.56%	26.32%
Value Added (\$)	834.9k	263.2k	6,431.1k	82,473	6.90%	31.58%
Net Turnover (\$)	2,775.6k	709.7k	14,923.5k	82,473	6.13%	34.65%
Tax Payments (\$)	45.4k	6.6k	429.7k	82,473	10.68%	38.64%
Gross Investments (\$)	149.5k	11.8k	1.286.8k	82,473	6.41%	35.88%

Notes: The values for value added, net turnover, tax payments, and gross investments were converted from SEK to USD using the average of the yearly currency exchange rates between 2000 and 2006.

Firms Owned (Directly and Indirectly) by the Wealthy

Variable	Mean	Median	Std. Dev.	Obs.	% of Swedish Aggregates
Pa	nel A. All act	ive firms hel	d by ultimate o	owners	
Nr. of Ultimate Owners	2.4	1	32.6	692,054	
Nr. of Employees	10.5	4	49.9	692,054	20.82%
Value Added (\$)	514.5k	194.7k	3590.4k	638,841	32.73%
Net Turnover (\$)	1,740.3k	509.3k	12,044.2k	638,841	28.90%
Tax Payments (\$)	20.6k	2.6k	552.1k	638,841	37.63%
Gross Investments (\$)	78.3k	6.9k	849.9k	638,841	25.34%
Panel B. Active firm	s with at leas	st one ultim	ate owner in th	ne top 2% of	net wealth
Nr. of Ultimate Owners	5.5	2	73.9	134,540	
Nr. of Employees	21.8	6	103.2	134,540	8.61%
Value Added (\$)	1,175.7k	334.5k	6,024.2k	125,324	14.53%
Net Turnover (\$)	4,399.4k	962.1k	25,521.6k	125,324	14.53%
Tax Payments (\$)	56.5k	6.5k	580.3k	125,324	17.98%

Notes: The values for value added, net turnover, tax payments, and gross investments were converted from SEK to USD using the average of the yearly currency exchange rates between 2000 and 2006.

Effects of Out-Migration on Firm-Level Outcomes

- Firm outcomes before and after out-migration of their owners
 - Comparison group: firms held by wealthy stayers
 - Random allocation of placebo out-migration dates (no matching)
 - Focus on firms held in -1 with at least one employee
- Dynamic self-selection into out-migration? What happens after?

$$\underbrace{y_{ft}}_{\text{Firm outcome}} = \sum_{\substack{j=-5\\j\neq-1}}^{5} \beta_j \times \underbrace{1 \cdot (M_f = 1) \cdot 1(t = j)}_{\text{Migrant Owner x time to event FE}} + \sum_j \delta_j \cdot 1(t = j) + \varepsilon_{ft}$$

Wealthy Owners Close Their CHB Upon Leaving

a. Probability Firm is Alive

b. Probability of Closure





Year Relative to Owner's Out-Migration



Year Relative to Owner's Out-Migration

Economic Effects of the Wealthy Migration: Mechanisms

- Negative firm-level outcomes following owner out-migration
 - Mostly driven by extensive margin
 - Little effect at intensive margin Intensive Margin
 - Effects on subsidiaries have similar magnitude Subsidiaries
 - Economic effects of in-migration are symmetric In-Migration
- Firm-level effects \neq net economic effects of wealth taxation:
 - Part of firms' closure events are buyouts Buyouts
 - Workers reallocate to other firms Worker-level analysis
 - Solution of the second seco

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Wealth Tax Rates in Sweden



Out-Migration Rates of the Wealthy



Estimation Strategy

• Effect of the reform on Y_{it} : out-migration rate of individual *i*

$$Y_{it} = \alpha + \sum_{t=2000}^{\bar{t}} \frac{\beta_j}{\sum_{i=1}^{\bar{t}} \frac{\beta_j}{\sum_{i=1}^{\bar{t}} \frac{1}{\sum_{i=1}^{\bar{t}} \frac{1}{\sum_{i$$

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$$Y_{it} = \alpha + \sum_{t=2000}^{\tilde{t}} \frac{\beta_j}{p_i} \cdot \underbrace{1(t=j) \cdot 1(T_i=1)}_{\text{year FE} \times \text{ top } 2\% \text{ dummy}} + \gamma_t + \delta \cdot 1 \cdot (T_i=1) + u_{it}$$

• Compute semi-elasticity of migration from IV using DD as instrument

$$Y_{lt} = \varepsilon \underbrace{\ln(1 - \tau_{lt})}_{\mathsf{IV}: \ (\mathcal{T}_l = 1) \cdot (t \ge 2007)} + \beta \cdot (t \ge 2007) + \eta \cdot (\mathcal{T}_l = 1) + u_{lt}$$

- Y_{it} : out-migration rate of group $I = \{T, C\}$ in year t
- Because τ small, ε has simple interpretation
- Compute predicted wealth to investigate longer-run effects

Effect of the Wealth Tax Repeal

1 pct point increase in τ increases wealthy out-migration by 0.17 pct point


Semi-Elasticities of Out-Migration by Characteristics

Very Little Heterogeneity in Out-Migration Semi-Elasticities
Denmark DiD



Interpreting the Magnitude: From Flows to Stock

- Well identified estimate of the effects on migration flows
- Translate into effect on pop. size (stock) using simple OLG model
- Elasticity of steady state population size N w.r.t 1τ :

$$\Rightarrow \varepsilon_{N,1-\tau} \approx 2.16(0.620)$$

- Comparison with migration elasticities in the income tax literature?
 - Translate elasticity with respect to implicit capital income tax rate
 - ${\scriptstyle \bullet}\,$ Yields elasticity \approx .1

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Aggregate Implications of Tax-Induced Migration

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 - \bullet A 1 pct point increase in τ decreases stock of wealthy by 2.16%
- Indirect effect: tax-induced migration may reduce other outcomes
- Use estimated effects of wealthy out-migration events to gauge this:
 - Tax-induced migration events must be similar in the way they shape firms' and individuals' outcomes
 - No selection based on demographics (homogeneous elasticities)
 - Spillover effects similar before and after repeal of the tax
 - No simultaneous shock that would affect firms/individuals' outcomes even absent migration

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- Use estimated effects of wealthy out-migration events to gauge this:
- Quantify upper bounds assuming (1) and (2) hold
 - -0.11% individual tax payments (excluding wealth tax)
 - -0.18% in firms' tax payments
 - \bullet -0.1% in aggregate value added
 - -.03% in aggregate employment

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- Aggregate implications of tax-induced migration were modest

APPENDIX SLIDES

Wealth Tax Exemption Threshold in Sweden: 1999-2006 Top 2% for couples, top 8% for singles



Share Paying the Wealth Tax by Wealth Level: 1999-2006 We define the wealthy based on *total* net wealth



Fractile of HH Net Wealth Distribution

Share Paying the Wealth Tax by Wealth Level: 1999-2006

We define the wealthy based on total net wealth



Fractile of HH Net Wealth Distribution

Taxation and Definition of Closely-Held Businesses

- Definition of Closely-held businesses (CHB)
 - $\bullet\,$ 4 largest owners have more than 50% of the votes
- Definition of tax-exempt business assets
 - Must prove the assets are "essential" to firm's activity
 - Various concrete rules to check (e. g quick ratio rule)
- Limitations on income shifting ("3:12 rules")
 - The amount of income taxed as capital income is capped

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Figure: Countries of Destination: Top 2% of Wealth Holders in Sweden



Figure: Countries of Destination: Top 20% to 10% of Wealth Holders in Sweden



Summary Statistics Treatment vs Control Units

Control Group						Treatment Group	
Variable	Mean	Median	Std. Dev.	Obs.	Mean	Median	Std. Dev.
Panel A. Sample of individuals in the top 2% of net worth							
Total Tax Payments (\$)	25.3k	13k	128.8k	1,997,202	47.2k	14k	253.5k
Labour Income Tax Payments (\$)	15.0k	9k	29.0k	1,997,202	26.3k	8k	111.7k
Capital Income Tax Payments (\$)	7.1k	1k	111.7k	1,997,200	17.1k	0	211.7k
Wealth Tax Payments (\$)	2.1k	0	14.7k	1,997,200	2.5k	0	16.9k
Panel B. Sample of active CHBs with at least one owner in the top 2% of net worth							
Number of Employees	10.5	3	50.1	187,093	18.5	2	83.4
Value Added (\$)	975.0k	278k	4,810.9k	210,706	3,766.2k	423k	21,257.4k
Net Turnover (\$)	3,455.8k	756k	27,469.3k	210,706	10,659.5k	1,218k	50,444.0k
Tax Payments (\$)	52.6k	7k	369.7k	210,706	195.8k	10k	930.9k
Gross Investments (\$)	148.7k	8k	1,036.3k	201,686	269.1k	10k	1,199.1k

▶ Back to individual ES . ▶ Back to firm ES



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	Only Directly-He	eld Firms	Directly and Indirectly-Held Firms		
Outcome	Average Outcome for Treated in $t = -1$	Effect in $t = +5$	Average Outcome for Treated in $t = -1$	Effect in $t = +5$	
Prob. Firm Is Alive (pp)	1.00	-27.41% (2.91)	1.00	-21.08% (3.44)	
Number of Employees	8.63	-33.26%	21.17	-18.79%	
Value Added (SEK 1,000)	6,198.86	-34.22%	11,874.08	-33.13%	
Net Turnover (SEK 1,000)	21,274.53	-31.71%	39,673.01	-27.11%	
Tax Payments (SEK 1,000)	390.50	-50.51%	483.27	-45.00%	
Gross Investments (SEK 1,000)	636.34	-21.90% (10.08)	877.68	-19.49% (6.13)	

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Tracking Employees After Firm Closure

 $Y_{ear} = t$

- Among the firms with out-migrant owners, we focus on the ones closing in the year of the out-migration event or after
- We select the individuals working at these firms in their last year of activity (year = t)

 $Y_{ear} = t + 1$

• We track these workers to their employment in year t+1

Origin Firm	Employee		Employee	Destination Firm	Share Going to Same Firm
	1	\Rightarrow	1	В	20%
	2		2		
A	3		3	C	000/
	4		4	C	00%
	5		5		

• Approximately 50% of the firms closing with at least 5 employees send at least 50% of their workers to the same firm



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b. Labor Income Tax



c. Capital Income Tax + Wealth Tax



Start with law of motion of wealth: Wealth = W, Return = r, Capital Income = rW, consumption=C, Earnings=E, Inheritance=I

$$W_t = (1 + r_t) W_{t-1} + E_t + I_t - C_t$$

Interesting point = for individuals observed after end of wealth tax, we can use rich information about their observed past wealth to predict wealth forward this means we have one model to predict wealth in t+5 or t+10 say, based on wealth in t

By iteration we get, for instance after X iterations

$$W_t = W_{t-X} \prod_{j=t-X}^t (1+r_j) + \sum_{k=t-X}^t (E_k + I_k - C_k) \prod_{j=k+1}^t (1+r_j)$$

Above decomposition shows that difference and capital income stem from:

- Past wealth (which we observe!)
- Past earnings/consumption (or past savings behaviour) (life-cycle wealth)
- Differences in net of returns r_t
- Inheritance received (inherited wealth)

But good thing is, law of motion is an identity, and we observe a lot of elements of this identity!

Assessing Quality of Prediction Model

Figure: Prediction Model - Fit



Out-Migration Rates by Wealth Level in DK: 1989-1996



In-Migration Rates by Wealth Level in DK: 1989-1996



Statutory Wealth MTR - Denmark





Top Wealth ATR - Denmark



Danish Reforms: Migration Effects Top 1%: Out Migration Rates



Danish Reforms: Migration Effects Top 1%: In Migration Rates



Danish Reforms: Migration Effects Top 1%: Net Migration Rates



Danish Reforms: Migration Effects Top .05%: Out Migration Rates



Danish Reforms: Migration Effects Top .05%: In Migration Rates



Danish Reforms: Migration Effects Top .05%: Net Migration Rates


$$N_t = \sum_k N_t^k$$









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$$N_t = \sum_k N_t^k$$



- Well identified estimate of the effects on migration flows
- Translate into effect on pop. size (stock) using simple OLG model
- Population size at time t = sum of pop. of all ages k at t

$$N_t = \sum_k N_t^k$$

• At each age k = 1, ..., T population size at time t is

$$\begin{array}{lll} \mathcal{N}_t^1 &=& \mathcal{B}_t \\ \mathcal{N}_t^2 &=& (1-\alpha_t^1)\mathcal{N}_{t-1}^1 = (1-\alpha_t^1)\mathcal{B}_{t-1} \\ \mathcal{N}_t^3 &=& (1-\alpha_t^2)\mathcal{N}_{t-1}^2 = (1-\alpha_t^2)(1-\alpha_{t-1}^1)\mathcal{B}_{t-2}, \textit{Etc.} \end{array}$$

- *B_t*: number of "births"
- α_t^k : net migration rate of population of age k at time t

Interpreting the Magnitude: Stock Elasticity

• At steady state: $B_t = B_{t-1}, \forall t \text{ and } \alpha_t^k = \alpha_{t-1}^k, \forall t, k$

$$N_t = B_t \sum_{k=0}^T \prod_{j=0}^k (1 - \alpha^{k-j})$$

• Elasticity of steady state population size w.r.t $1 - \tau$:

• Assume (for simplicity) marginal effect of reform on α^k same $\forall k$

$$\varepsilon_{N,1-\tau} \approx -\frac{d\overline{\alpha}}{d\ln(1-\tau)} \cdot \frac{T+1}{2}$$

• Average number of years spent in top 1%: T=24 yrs

$$\Rightarrow \varepsilon_{N,1-\tau} \approx 2.16(0.620)$$

• **Conservative upper-bound** with anticipation effects (*T*=50 yrs):

$$\Rightarrow \varepsilon_{N,1-\tau} \approx 4.42(1.264)$$



Comparison to Elasticities in the Literature



Change in Capital Income Taxation Induced by Wealth Tax

- Transform estimate into elasticity w.r.t 1-t
 - Where $t \approx \frac{\tau}{r}$: avg tax on K income
 - Over period of interest, we find: r = .042, and $\tau \approx .006 \Rightarrow t = 14.3\%$

$$\varepsilon_{N,1-t} = \varepsilon_{N,1-\tau} \cdot \frac{d\ln(1-\tau)}{d\ln(1-t)} \approx .078$$
 (.013)

DAUK	
	-

Linear Probability Model of Out-Migration

- Two models to study selection into out-migration (Y) from Sweden
 - Model 1 All individuals:

$$\mathbb{P}\{Y=1\}=\boldsymbol{\beta}'\mathbf{X}_0$$

• Model 2 - Individuals in the top 2% of net wealth:

$$\mathbb{P}\{Y=1\} = 1\{W < P_W\} \cdot \beta' \mathbf{X}_0 + 1\{W \ge P_W\} \cdot \beta_w' \mathbf{X}_0$$

- X₀ is a vector of individual characteristics
- P_W is the 98th percentile of the net wealth distribution

Effect on Employment Before vs After Wealth Tax Repeal

a. Before

b. After



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	Effects In Levels			Р	ercentage Effects	6		
	Out-Migration Years:			Out-Migration Years:				
Outcome	[2001, 2006]	[2007, 2013]	T-Stat	[2001, 2006]	[2007, 2013]	T-Stat		
	$t_{pre} = +5$	$t_{post} = +5$	$t_{pre} = t_{post}$	$t_{pre} = +5$	$t_{post} = +5$	$t_{pre} = t_p$		
Sample of CHBs with owner in the top 2% of net worth								
Prob. Firm Is Alive (pp)	-28	-24.47	-0.86	-28%	-24%	-0.86		
	(3.43)	(3.76)		(3.43)	(3.76)			
Number of Employees	-3.40	-2.22	-1	-36%	-27%	-0.74		
	(0.81)	(0.76)		(8.77)	(9.43)			
Value Added (SEK1,000)	-2,917	-875	-2	-42%	-18%	-1		
	(624)	(598)		(9.09)	(12.32)			
Net Turnover (SEK1,000)	-9,272	-2,752	-2.41	-39%	-16%	-1.72		
	(2,056)	(1,759)		(8.73)	(10.33)			
Tax Payments (SEK1,000)	-202	-85	-2.04	-50%	-28%	-1.37		
	(45)	(34)		(11)	(11)			
Gross Investments (SEK1,000)	-196	-75	-1.27	-30%	-19%	-0.61		
	(78)	(55)		(12)	(14)			

