# THE FIRM AS TAX SHELTER

MICRO EVIDENCE AND AGGREGATE IMPLICATIONS OF CONSUMPTION THROUGH THE FIRM

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- Consumption through the firm prevents business income from being taxed as a distribution

   either as dividends or wages and inflates firm costs.
- It is a *margin of tax evasion* that circumvents CIT, PIT & VAT, regardless of differences in tax rates between L and K, and irrespective of how broadly the tax bases are designed.
- It does not require tax sophistication and it is almost impossible to enforce given the *wide* range of expenditures that lie on the border between business and personal consumption.
- Has important implications for the measurement of the *scale of tax evasion* and *income inequality*, and it might distort the measurement of household's final consumption and firms' intermediate consumption, and result in undervaluation of the GDP.

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Despite these implications, consumption through the firm has not been well studied.

- The literature has focused on the flexibility of owner-managers to chose how to label business income to minimize taxes at payout and to use firms as tax-free saving vehicles through strategic earnings retention (Smith et al., 2021; Miller et al., 2020).
- Some authors have suggested it as a payout strategy among individuals who control firms (Kopczuk and Zwick, 2020; Alstadsæter et al., 2014; Clotfelter, 1983).
- For example, following the introduction of dividend taxation in Norway in 2006: "While all categories of assets grow, the increase in durable asset categories that include company cars, planes, and boats is particularly striking" (Alstadsæter et al., 2014).

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Yet, the press is full of colorful anecdotal evidence... 

Sources



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**CEOs, Bankers Used Corporate Credit Cards** for Sex, Says New York Madam

Wall Street exposed as convicted escort boss reveals client list of 9.800.

By ABC News February 5, 2009, 9:37 PM

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Dans son audition au Liban que révèle «Libération», le magnat de l'automobile, interrogé pour la première fois sur ses «dépenses personnelles» prises en charge par Renault-Nissan, a tenté de justifier

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  - Monthly consumption expenditures covering ≈ 70-75% of the net-of-VAT final consumption expenditures of resident households recorded in National Accounts.
  - Monthly business expenditures covering all business-to-business transactions.
  - Social security records capturing transitions from employee to business manager.
- Use panel event studies exploiting:
  - The variation in the flexibility to treat some forms of personal consumption as business expenditures that accompanies the employee-to-manager transition.
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- 2 Background and data
- 3 Consumption through the firm: Micro evidence
- 4 Aggregate implications



### BACKGROUND AND DATA

- e-Fatura is an electronic invoicing software adopted in 2013 to fight VAT fraud.
- For firms and other legal entities, electronic invoicing is mandatory, so e–Fatura cover the universe of business-to-business transactions.
- For final consumers, the government provides a set of incentives for them to ask for an invoice with their taxpayer number at the time of the purchase:
  - Weekly lotteries with a prize of 35,000 euros each.
  - Rebate on personal income tax of 15% of the VAT supported on restaurants, hairdressers, vets, car repair.
  - Deduction to personal income tax of 35% of all expenditures (up to 500 euros), plus
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#### EXAMPLE OF THE E-FATURA ONLINE ACCOUNT

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#### EMPLOYEE-TO-MANAGER TRANSITIONS

Two distinct social security regimes:

- Employees
- Business managers

Social security records provide data on the month individuals start contributing under a regime  $\Rightarrow$  stocks & flows

**Focus:** individuals who switch from Employee to Business manager from Jan-2016 to Dec-2019



#### ANALYSIS DATASET

	2016	2017	2018	2019	2016-2019
Individuals					
Switchers	6,973	7,272	7,418	8,014	29,677
Spouse/partner	4,032	4,075	3,896	3,991	15,994
Children/others	6,514	6,503	6,294	6,498	25,809
All individuals	17,519	17,850	17,608	18,503	71,480
Share who stay 48 months	0.82	0.78	0.72	0.68	0.77
Matched with Monthly Expendit	ure data				
Total Observations	5,237,167	5,617,369	6,024,052	6,601,955	23,480,543

#### → Summary statistics → Firm characteristics of switchers → Expenditure shares of switchers
















→ Raw Event: 2016 & 2017 Cohorts → Raw Event: 2018 & 2019 Cohorts

# CONSUMPTION THROUGH THE FIRM: MICRO EVIDENCE

# EVENT STUDIES WITH STAGGERED ADOPTION

I estimate how monthly personal expenditures evolve after an individual chooses to switch from being an *employee* to being a *business manager* with an event study:

$$\log(y_{it}) = \alpha_i + \lambda_t + \sum_{g \in G} \delta_g \cdot \mathbf{1} [t - E_i \in g] + \varepsilon_{it}, \tag{1}$$

- *i* indexes individuals and the *t* indexes calendar months,  $y_{it}$  is the reported monthly expenditure,  $\lambda_t$  is a year-by-calendar month fixed effect and  $\delta_i$  is an individual fixed effect,  $e_{it} = t E_i$  is the event time, the set *G* collects disjoint sets *g* of *relative periods*  $l \in [-T, T]$ .
- To account for the heterogeneity in treatment timing, I estimate the event study using the estimator from Callaway and Sant'Anna (2020).
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Months around the switch from employee to business manager



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Alternative estimators

# **INCOME SHOCK?**

- Individual expenditures drop by about 36% when individuals become managers (20% in the first month after becoming business manager).
- Spouse's expenditures drop by spouse by about 12% and combined household expenditures drop by about 31%.
- Is this alternatively the result of an income shock and/or increases in savings?
  - Income Shock? Employees opening their own business but earning less business income as compared to labor income.
  - Prudence? Individuals become entrepreneurs and increase precautionary savings in face of uncertain business incomes.
- If it is a shock to income, all consumption should react, but...

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Nonessential health services



#### Wholesale & retail trade; car repair

#### Nonessential health services



Supermarkets, clothing and shoes, household equipment, food and beverages, fuel and car repair.

### Wholesale & retail trade; car repair



Supermarkets, clothing and shoes, household equipment, food and beverages, fuel and car repair.

### Nonessential health services



Nonurgent medical services provided by the private sector, namely dentistry and therapy.

Hotels & restaurants

Private education



#### Hotels & restaurants

**Private education** 



Hotels, holiday and short stay accommodation, catering, food and beverage service activities.

#### Hotels & restaurants

#### Private education



Hotels, holiday and short stay accommodation, catering, food and beverage service activities.

Education services provided by the private sector, namely private tutoring and sports, and cultural activities.



Electricity, gas & air conditioning



#### Information & communication



### Information & communication



### Electricity, gas & air conditioning



telecommunication services.

#### Technical activities

Water distribution



### **Technical activities**

Water distribution



### **Technical activities**

#### Water distribution















# HOW INCOME EVOLVES AROUND THE SWITCH?



Years around the switch from employee to owner-manager

# HOW INCOME EVOLVES AROUND THE SWITCH?



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# HOW INCOME EVOLVES AROUND THE SWITCH?



Years around the switch from employee to owner-manager

Averages by percentile Position on the income distribution

- Significant declines in household consumption expenditures after individuals become business managers.
- Income shock is ruled-out: only expenditures that lie on the business-consumption borderline adjust while hard-to-shift expenditures to not react to the switch.
- But... Is this of major economic importance?
- To understand whether consumption through the firm is limited to "poor" business managers or is instead a widespread phenomenon, I estimate the effects across the income distribution.

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Ventiles of taxable income



Ventiles of taxable income



Ventiles of taxable income



By decile → By percentile

### HETEROGENEITY

- Effects by firm size ( ▶ here )
- Effects by ownership status ( > here )
- Effects by industry ( ▶ here )

Additional descriptives on the population of business managers:

- Position in the income distribution ( 
  <sup>here</sup> )
- Distribution by firm size ( > here )
- Distribution by industry ( > here )

- Looking at firm's expenditures it is very hard to distinguish the pure business demand from the goods and services purchased solely for their consumption value.
- How personal consumption motives affect the pattern of business expenditures? I estimate how monthly business expenditures react to life events of the business owner-manager with the following event study:

$$F_{it} = \sum_{k \in \{-5+,...,-1,0,1,...,5+\}} \beta_k \mathbf{1}(t=k) + \theta_i + \lambda_t + \varepsilon_{it}$$
(2)

• Specifically, I estimate how monthly business expenditures on hotels and restaurants evolves around the birthday month of the owner-manager and the spouse.

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▶ Raw averages (Owner-managers) → Raw averages (Employees)

# MONTHLY BUSINESS EXPENDITURES IN HOTELS & RESTAURANTS

Birth month of a randomly selected employee



Months around the birthday of owner-manager/employee

Months around the birthday of the spuse of owner-manager/employee

# MONTHLY BUSINESS EXPENDITURES IN HOTELS & RESTAURANTS

### Birth month of a randomly selected employee

#### 0.10 0.10 Employee & Rest. Spouse of employee Effect on Business Expenditures in Hotels & Rest. 95% pointwise C 95% pointwise Cl 0.08 0.08 Hotels 0.06 0.06 0.04 0.04 ⊆ Expenditures 0.02 0.02 -0.02 -0.02 Business -0.04 -0.04 -0.06 -0.06 Effect on -0.08 -0.08 -0.10 -0.10 Ś N 5

Months around the birthday of owner-manager/employee

Months around the birthday of the spuse of owner-manager/employee

Birth month of the employee's spouse

# MONTHLY BUSINESS EXPENDITURES IN HOTELS & RESTAURANTS

### Birth month of the owner-manager



Birth month of the owner-manager's spouse

# AGGREGATE IMPLICATIONS

### BASELINE HOUSEHOLD CONSUMPTION

Million EUR % of GDP

Household expenditure (5.3 million households)	53,744	25.07
Owner-managers' household expenditure (287.9 thousand households)	6,119	2.85

### ADJUSTING HOUSEHOLD CONSUMPTION

		$\widehat{\delta}$ = 0.3123			$\delta = \widehat{\delta}_{p}$				
	Millio	Million EUR		% of GDP		Million EUR		GDP	
$\Delta Cons. = \overline{c}/(1-\hat{\delta}) - \overline{c}$	2,	2,778		1.30		2,672		1.25	
	(2,577	2,989)	(1.20	1.39)	(1,238	5,598)	(0.58	2.61)	

	$\widehat{\delta} = 0.3123$			$\delta = \widehat{\delta}_{\boldsymbol{p}}$				
	Million EUR % of GDP				Milli	on EUR	% of	GDP
Aggregate loss in PIT								
Dividends: $\tau$ = 28%	1,080		0.50		1,039		0.48	
$\tau/(1-\tau)\cdot\Delta Cons.$	(1,002	1,162)	(0.47	0.54)	(482	2,177)	(0.22	1.02)

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Aggregate loss in PIT and VAT						
Dividends: $\tau$ = 28%; VAT: $\gamma$ = 23%	2,233	1.04	2,148	1.00		
$\left[\frac{1}{(1-\gamma)\cdot(1-\tau)}-1\right]\cdot\DeltaCons.$	(2,071 2,402)	(0.97 1.12)	(995 4,499)	(0.46 2.10)		

	$\widehat{\delta} = 0.$	3123	$\delta = \widehat{\delta}_{p}$			
	Million EUR	Million EUR % of GDP		% of GDP		
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Offshore Tax Evasion by Individuals - Zucman (2017)



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Offshore Tax Evasion by Individuals - Zucman (2017)



SOURCE: Zucman (2017) available on the EU Tax Observatory website [link]

### ADJUSTING HOUSEHOLD INCOME

		$\widehat{\delta} = 0.3123$			$\delta = \widehat{\delta}_{p}$				
	Million EUR		% of GDP		Million EUR		% of GDP		
$\frac{1}{(1-\gamma)\cdot(1-\tau)}\cdot\Delta\text{Cons.}$	5,	5,011		2.34		4,820		2.25	
	(4,648	5,391)	(2.17	2.51)	(2,233	10,097)	(1.04	4.71)	









▶ Income Shares
- Business managers shift approximately 36% of their personal expenditures to the firm and 31% of their combined household expenditures. The shift is driven by expenditures on the border between business and consumption, while hard-to-shift expenditures do not react.
- Scope for consumption through the firm is greater among small closely held firms.
- The pattern of business expenditures is affected by personal consumption motives: business expenditures in hotels and restaurants increase 9.8% in the birthday month of the owner-manager and 6.1% in the birthday month of the owner-manager's spouse.
- Government revenue loss in PIT and VAT due to consumption through the firm amounts to 1% of the GDP. Reallocating to reported income the share of personal consumption hidden within the firm plus the tax savings increases the Gini coefficient by one percentage point.

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# **APPENDIX TO**

THE FIRM AS TAX SHELTER

MICRO EVIDENCE AND AGGREGATE IMPLICATIONS OF CONSUMPTION THROUGH THE FIRM

## ALTERNATIVE ESTIMATORS



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## AVERAGE EFFECTS ON ALL EXPENDITURE CATEGORIES — SWITCHER & SPOUSE



## EFFECTS BY DECILE OF HOUSEHOLD TAXABLE INCOME

#### Switcher & Spouse

Household



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## EFFECTS BY PERCENTILE OF TAXABLE INCOME — SWITCHER



Percentiles of taxable income

## EFFECTS BY PERCENTILE OF TAXABLE INCOME — SPOUSE



Percentiles of taxable income

## EFFECTS BY PERCENTILE OF TAXABLE INCOME — HOUSEHOLD



Percentiles of Taxable Income

## EFFECTS BY FIRM SIZE: SMALL, MEDIUM AND LARGE FIRMS - SWITCHER

Small firms (<10 workers)



#### Med firms (10 to 50 workers)



### Large firms (> 50 workers)



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## EFFECTS BY FIRM SIZE: SMALL, MEDIUM AND LARGE FIRMS - SPOUSE

Small firms (<10 workers)



#### Med firms (10 to 50 workers)



## Large firms (> 50 workers)



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## EFFECTS BY FIRM SIZE: SMALL, MEDIUM AND LARGE FIRMS — HOUSEHOLD

Small firms (<10 workers)



#### Med firms (10 to 50 workers)



### Large firms (> 50 workers)



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## EFFECTS BY FIRM OWNERSHIP: OWNER VS. NONOWNER BUSINESS MANAGER

Switcher



#### Spouse



#### Household



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## AVERAGE EFFECTS BY INDUSTRY — SWITCHER AND SPOUSE



## AVERAGE EFFECTS BY INDUSTRY — HOUSEHOLD



# EFFECTS ON BUSINESS EXPENDITURES AT BIRTHDAY MONTH — OWNER-MANAGERS VS. EMPLOYEES



## EFFECTS ON BUSINESS EXPENDITURES AT BIRTHDAY MONTH — SPOUSES



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## IMPLICATIONS FOR TOP INCOME SHARES

	2018		2019	
	Reported	Adjusted	Reported	Adjusted
Bottom 50%	19.10	18.45	19.32	18.67
50%-90%	45.23	44.82	45.32	44.94
Top 10%	35.68	36.73	35.37	36.39
Тор 5%	23.56	24.41	23.31	24.13
Top 1%	8.59	9.09	8.50	8.96
Top 0.1%	2.14	2.37	2.17	2.37

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	Cohort 2016	Cohort 2017	Cohort 2018	Cohort 2019	Panel 2016–19
Age	39.80	40.02	39.81	39.72	39.84
Male	0.66	0.68	0.68	0.69	0.68
Married	0.57	0.56	0.53	0.50	0.54
Household size	2.47	2.41	2.33	2.27	2.37
Mean	25,659	26,859	26,370	25,659	25,587
P10	4,770	4,934	5,040	4,770	4,899
P50	14,981	14,999	14,686	14,981	14,625
P90	53,067	53,713	53,794	53,067	52,062
Top 1%	175,148	192,713	180,623	175,148	173,726

	Role as employee	Role as manager
Non-existing firm	-	0.75
Same firm	-	0.05
Limited liability company	0.62	0.73
Single member company	0.13	0.20
Non-profit organization	0.03	0.04
Join-stock company	0.17	0.02
Others	0.05	0.01

	Role as employee	Role as manager
Average Number of Workers	112.05	7 21
< 10 Workers	0.58	0.96
$\geq$ 10 and < 50 Workers	0.23	0.03
≥ 50 Workers	0.18	0.01
Mean of Sales	13,762.39	659.01
Mean of Assets	19,814.19	1,766.86
Mean of Profits	392.19	42.13

	Role as employee	Role as manager
Retail Trade	0.21	0.19
Hotels & Restaurants	0.11	0.13
Construction	0.11	0.10
Manufacturing	0.13	0.08
Consultancy	0.08	0.09
Transportation	0.05	0.07
Human Health	0.05	0.05
Admnistrative Activities	0.06	0.04
Other Service Activities	0.03	0.05
Real Estate	0.03	0.05
Inform. & Communication	0.04	0.04
Entertainement	0.02	0.04
Other Sectors	0.08	0.06

## HOUSEHOLD CONSUMPTION SHARES OF THE SWITCHERS



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## RAW EVENT: 2016 AND 2017 COHORTS

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2016 Cohort

2017 Cohort

## RAW EVENT: 2018 AND 2019 COHORTS

2018 Cohort

6.50 6.65 Monthly household consumption expenditures Monthly household consumption expenditures 6.45 6.58 6.50 6.40 6.35 6.43 6.30 6.35 6.25 6.28 6.20 6.20 9 പ് 22 r, 1 6 5 Š ς, 0 e, å o' ø ക് ~ 6 ŝ 0 6 Ś ò Months around the switch from employee to manager (2018) Months around the switch from employee to manager (2019)

2019 Cohort

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# Evolution of the top 1%, median and bottom 10%



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# POSITION OF BUSINESS MANAGERS IN THE POPULATION'S DISTRIBUTION OF INCOME AND EXPENDITURE

Income distribution

Expenditure distribution



Back to "Evolution of Income"

Back to "Heterogeneity"

## DISTRIBUTION OF THE POPULATION OF BUSINESS MANAGERS BY FIRM SIZE

Number of workers

Volume of sales



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## DISTRIBUTION OF THE POPULATION OF BUSINESS MANAGERS BY INDUSTRY



# BUSINESS EXPENDITURES IN HOTELS & RESTAURANTS: OWNER-MANAGERS

Birth month of the owner-manager



Birth month of the owner-manager's spouse

# BUSINESS EXPENDITURES IN HOTELS & RESTAURANTS: EMPLOYEES

Birth month of the employee



Birth month of the employee's spouse

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## ANECDOTAL EVIDENCE COLLECTED FROM PRESS RECORDS

- United States: New York Times, ABC News
- France: *Libération* (in French)
- Spain: The Guardian
- Portugal: Expresso (in Portuguese)