

INDEX

Note: page numbers in **bold type** indicate figures or tables.

- Abramovich, Roman, 58
 ‘acts of citizenship’, 79–80, 83
 Adoniov, Sergei, 502
 Afghanistan, 118, 154, 277
 African Americans, encouraged to emigrate, 265
 Aldrich, Robert, 282
 al-Qaeda, 512
 American Colonization Society, 265
 American Fugitive Slave Act (1850), 265
 American Revolution, nation-state model and, 285
 ancestry-based citizenship applications for in European countries, 304
 commodification of citizenship and, 298–299, 307
 examples of, 14, 298, 303, 401
 fairness, 14
 meaningfulness, 152
 motivation for European governments to offer, 299
 strategic acquisition of, 4
 Andean region, 269, 271
 Anderson, Benedict, 219
 Anderson, Elizabeth, 347, 349
 Andre, Judith, 339
 Anguilla, 531, 532
 anti-commodification arguments coercion argument, 339
 moral limits of markets, 338–359
 motivational corruption argument, 355–359
 queue-jumping examples, 338
 value degradation argument, 347–355
 wrong distribution argument, 340–347
 Antigua & Barbuda benefits of Commonwealth membership, 275
 CBI programme, 14, 32, 34, 37
 macroeconomic outcomes, 66
 commission system, 61
 extradition case, 121, 127–129
 investment options, 27, 65
 investor programme, non-refundable payment requirement, 383
Lihua Tian revocation case, 416–417, 431
 potential security risk, 402
 residence requirements, 34
 revocation of citizenship provision, 424
 Antilles, rejection of independence, 516
 Arendt, Hannah, 229–230
 Argentina, 269
 citizenship industry, 306
 naturalisation by operation of law, 143
 Aristotle, 230, 243
 Aruba, 511
 rejection of independence, 516
 Asia, increase in number of billionaires, 275
 asylum, international rules around, 232
 asylum seekers definition, 232
 exclusion and refusal, 469
 and the implications of selling migration rights, 339, 342, 345
 large scale irregular movements of, 468

- Australia
 extension of citizenship to
 aboriginals, 92
 ‘innovation points test’, 395
 minimum investment amount, 39
 net inflows of HNWIs, 364
 premise of citizenship in, 262
 RBI programme, 31
 residence requirements, 34
- Austria
 citizenship schemes, 252
 discretionary economic citizenship
 practices, 32
 residence permits, 198
- authoritarianism, corruption and,
 465, *see also* Hungarian
 Residency Bond
- Bancroft, George, 240, 295
 Barbados, 273
 Bauböck, Rainer, 80, 83, 97, 252, 286,
 343–344
 Bazkka, Salmo, 479
 Becker, Gary, 339, 371
 Belgium, nationality cases, 191
 Belize, discretionary economic
 citizenship practices, 32
- Bermuda
 net inflows of HNWIs, 364
 rejection of independence, 516–518
- Bidoon populations, UAE’s forced
 distribution of Comoros
 citizenship for, 138–140, 150
- birthright citizenship, 142, 176–177, 344
 ‘birthright lottery’, 4, 18–19, 77, 99–100,
 231, 484, 513
- Blaise, Séverine, 511
 blasphemy laws, 258
 blood donations, impact of offering
 payment for, 355–356
- Boatcă, Manuela, 71
 Bodin, Jean, 95
 Bolivia, 271
 Bonilla, Yarimar, 282
 Bophuthatswana, 85
 Bosniak, Linda, 11, 76, 95
 Boucher, Sandy, 493
 Bourdieu, Pierre, 13, 99
- Brazil, 268, 281
 naturalisation by operation of law,
 143
 net outflows of HNWIs, 364
 RBI programme, 31
 Revolt of the Tailors, 265
- Brennan, Jason, 338
 Brexit, 42–44, 364, 524
 and loss of EU citizenship, 84, 187
- Brink, Martijn van den, 171
 British Nationality Act (1948), 270
- Brown, Wendy, 324
 Brubaker, Rogers, 231, 240
- Bulgaria
 CBI programme, 162
 co-ethnic citizenship policy, 300
 financing options, 60
 fraudulent acquisition of passports,
 116
 privileged naturalisation, 178
- Calvin, Jean, 248
- Canada
 business immigration reform,
 394–395
 CBI programme, methodological
 issues, 41
 contentious history of CBI, 486
 due diligence
 comparison with SKN, 498–499
 policy, 493–498
 financing options, 60
 Immigrant Investor Program, 10
 investment options, 63
 investor visa, impact of doubling
 cost, 6
 minimum investment amount, 39
 net inflows of HNWIs, 364
 as new home for African Americans,
 265
 RBI programme
 cancelled, 494
 due diligence and, 493–498
 freezing of, 45
 replacement, 494
 residence requirements, 34
 revision of Business Immigration
 Programme, 1

- revocation of automatic visa-free entry for SKN citizens, 156, 398, 490
 - role in the investment migration industry, 52
- Carens, Joseph, 87, 100, 311, 313, 314, 325
- Caribbean
 - commodification of citizenship status, 274
 - cost of citizenship, 38, 156
 - due diligence reforms, 506
 - history of colonial entanglements with Europe, 260
 - investment options, 64
 - investor programmes
 - non-refundable payment requirements, 383, 389
 - spillover effects, 390
 - valuation metric, 154
 - net inflows of HNWIs, 364
 - post-war extension of US citizenship rights and status to colonies, 273
 - real-estate development options, 384
 - uprisings, 264, 270
- Carrera, Sergio, 200
- Castro-Gómez, Santiago, 268
- Cayman Islands, 275
 - net inflows of HNWIs, 364
- Charlie Hebdo*, 467
- Chau-ping, Lee, 493
- children
 - birthright nationality, 169
 - impact of citizenship revocation on, 423
 - inheritance of American citizenship, 306
 - inheritance of citizen status, 213, 218–219, 295–298
 - inheritance of EU citizenship, 303
 - naturalisation by operation of law, 145
- Chile, 269, 281
- China
 - demand for CBI, 40, 44
 - growth in average incomes, 290
 - growth in investments across the globe, 451
 - increase in GDP per capita, 450
 - increase in number of billionaires, 275
 - increase in number of millionaires, 291, 450
 - international mobility of passport holders, 251
 - millionaires considering emigrating to a different country, 455
 - net outflows of HNWIs, 364
 - prohibition against dual citizenship, 44–46, 52, 297
 - push factors for HNWI migration, 369
 - role in the investment migration industry, 52–54
 - stock of outbound FDI held by, 451–452
- Chinese Central Commission for Discipline Inspection, 123
- Chinese National Bureau of Corruption Prevention, 124
- Choksi, Mehul, 121, 127–129
- Christian Church, 248
- Cicero, Marcus Tullius, 70
- circular migration, 526
- the citizen, Aristotle's definition, 243
- citizenship, *see also* victims of citizenship
 - as colonial concept, 71
 - commodification, 5
 - and political participation, 6–8
 - comparison of citizenships, 99
 - comparison with residence, 2–4, 29
 - comparison with statelessness, 75
 - concept of, 285–294
 - connection with political participation, 11
 - determining criteria, 103–105
 - dimensions of worth, 288
 - discrimination inherent in, 103
 - dramatic institutional changes, 284
 - as effective tool for preservation of global inequalities, 94
 - existing practices of citizenship law within liberal democratic societies, 345
 - first multilateral international convention on, 168

- citizenship (cont.)
 functions, 286
 normative dilemmas and, 84–89
 global industry, 307
 heritability, 29
 hierarchy of value, 289
 hypocrisy and randomness behind
 the concept of, 100–102,
 105–108
 international law of, 142–143
 Kálin and Kochenov model,
 289–90
 multilateral treaties imposing
 limitations on deprivation
 of, 111–112
 nationalist flavour of contemporary
 literature, 11
 outcomes of seriously contesting the
 institution, 107
 racist concept, 103
 relationship with exclusion, 11, 95,
 96, 105, 107, 262, 269
 relaxing of ancestral basis for
 allocating, 152
 vs rights, 89–95
 rights of, 84
 selling
 legitimacy of, *see* legitimacy of
 selling citizenship
 morality of, 99–105
 state sovereignty and, 110–115
 and the preservation of inequalities,
 77
 traditional understanding of, 240
 trivialisation of the status, 85
 victims of, 70–108
 citizenship acquisition, global rise in
 enabling legislation, 1–2
 Citizenship Act (Republic of Turkey),
 415
 ‘citizenship and residence planning’,
 coining of the term, 276
 citizenship by investment (CBI),
 32–34, *see also* investor
 programmes; residence by
 investment (RBI)
 abuse of, examples, 116
 concept of, 26, 301–302, 315–318
 concerns of states and international
 organizations about the
 practice, 109
 consequences of inadequate security
 controls, 156
 contentious history, 485
 criticisms, 252–254, 309–311
 dilution of nobility, 318–322
 investment migration as
 neoliberal citizenship,
 323–328
 of merit-based migration, 328–333
 definition, 250
 definition, OECD, 315
 EC focus on security risks, 115–116
 estimated worth of the global
 industry, 307
 EU focus on security risks, 115–116
 examples of, 109–110
 importance of due diligence
 screening, 56, *see also* due
 diligence
 as instrumental citizenship, 240–258
 interest in the phenomenon, 137–138
 key role of service providers, 37–38
 Lim’s critique, 328–333
 objective, 154
 presented as sacrilege, 99
 price competition in Caribbean
 states, 156
 proliferation of CBI programmes, 109
 residency requirements, 237
 revocation, legal implications,
 408–435, *see also* revocation
 of citizenship
 scholarly criticism in the light of
 international law, 112
 ‘streetlight effect’ in commentary
 on, 309–334
 subnational jurisdictions and,
 525–533
 sustainability perspective, 138
 Tanasoca’s critique, 318–322, 351, 354
 ‘who belongs’ vs ‘who should get in’,
 311–315
 citizenship by investment programmes
 (CIP), concept of, 35
 citizenship premium, 274–276

- citizenship tests, 243, 252, 429
 Clinton, Hillary, 227
 Cohen-Eliya, Moshe, 97
 Colombia, 281
 colonial perspectives, *see also*
 coloniality of citizenship
 post-war decolonization process,
 271–279
 unequal institution of modern
 citizenship, 263–271
 coloniality of citizenship, 259–283
 accumulation of capital at the heart
 of the global economy and,
 259–260
 citizenship through a Southern lens,
 260–263
 defining coloniality, 261
 Dred Scott case, 266
 global mobility and, 275
 Haitian revolution and, 262–265
 in Latin America, 268–270
 and nationality rankings, 277–279
 post-independence definition of
 national citizenship in Latin
 America, 268
 privileges awarded by Global North
 citizenships, 274
 UK's treatment of the *Windrush*
 families, 270–271
 commercialisation of citizenship,
 victims of citizenship and,
 105–108
 commodification objection to
 investment citizenship
 concept of, 335–338
 limits to, 360
 commodification of citizenship, 284–285
 citizenship as key to global
 inequality, 285–294
 as illustration of coloniality, 274
 new opportunity structure, 295–302
 ancestry-based external
 citizenship, 298–299, 307
 citizenship by investment,
 301–302
 ethnicity-based external
 citizenship, 299–301
 objections to, 252–254, 309–311
 pertinent trends, 290
 preferential citizenship-and-
 immigration policies, 298
 responses to, 307
 Common Reporting Standard (CRS),
 130, 132–134, 136
 Commonwealth, benefits of citizenship
 of a member state, 275
The Communist Manifesto (Marx), 226
 Comoros
 CBI programme, 35
 drivers of demand, 49
 discretionary economic citizenship
 practices, 32
 rejection of Comoros passports by
 states, 158
 UAE's forced distribution of
 citizenship to Bidoon
 population, 138, 139, 150
 'compensatory citizenship', 89, 256, 382
 conditional citizenship, rise of,
 429–432
 Connell, John, 282
 container theory of society, 71, 512
 Convention on the Elimination of All
 Forms of Discrimination
 against Women (CEDAW), 170
 Convention on the Reduction of
 Statelessness (1961), 126,
 433–434
 Cook, Geoff, 524
 Cook Islands, relationship with New
 Zealand, 522–523
 corruption
 Canadian attitudes towards, 497
 Chinese concerns, 124
 EU concerns, 141, 184, 462
 Hungarian Residency Bond
 Program, 465–484, *see also*
 under Hungary
 influence of media coverage, 508
 in Maltese institutions, 500
 motivational, 355–359
 purchase of political power and,
 320–322
 risk of as criticism levelled against
 investor programmes, 402, 405
 UN convention against, 122

- counter-terrorist financing (CTF), 486
 Court of Justice of the European Union (ECJ), 11, 161
 Covid-19, 69
 Crimea
 Russian annexation, 150, 512
 Russian mass naturalisation of residents, 150
 criminality, revocation of citizenship for
 accusation and conviction, 424–429
 recent examples, 426–427
 Croatia, co-ethnic citizenship policy, 300
 ‘culture of justification’, 97
 Curaçao, 530, 532
 customer due diligence (CDD), internationally accepted norms, 486
 Cyprus
 approval of passports to PEPs, 500
 CBI programme, 37, 162
 drivers of demand, 49
 frozen, 29, 33, 65
 macroeconomic outcomes, 66
 positive benefits, 65
 cost of citizenship, 38
 deprivation of nationality clauses, 418
 dismissal of claims that passports are for sale, 400
 due diligence procedure, 118–120, 501
 economic comparison with Malta, 462
 impact of regulatory competition, 456
 impact of the Euro crisis, 440
 investment migration industry, 237
 investment options, 27, 62, 63
 lowering of investment required for citizenship, 458
 nationality of investment residence permit holders, 453
 potential security risk, 402
 privileged naturalisation, 178
 property ownership requirements, 430
 residence requirements, 34
 residential property investment model, 385
 revocation of citizenship provision, 127, 426–427
 Russian community, 50
 social welfare protections, 58
 tax residence status, 131
 visa-free access to other countries, 362
 De la Court, Allard, 209–210
 decolonisation, impact on citizenship rights, 92
 de-indigenization, 269
 Democratic Republic of Germany, 189
 de-nationalization and re-nationalization of citizenship, 242
 Denmark
 business visa programme, 31
 EU persuasion for ratification of TEU, 188
 deprivation of citizenship/nationality, *see also* revocation of citizenship
 Antigua & Barbuda, 431
 criminal convictions and, 425–426, 429
 Cyprus, 427
 due diligence and, 135
 EU limitations, 115
 EU Member States, 187, 192
 fraud and, 172
 Grenada, 426
 Lihua Tian case, 431
 limitations imposed by multilateral treaties, 111
 mitigation of statelessness, 433–434
 proportionality test, 114, 422
 as protective measure for CBI programmes, 126
 strict non-discrimination approach and, 102
 Turkey, 424
 US Supreme Court ruling, 430
 vulnerability of CBI applicants to, 417–418

- Dessalines, Jean-Jacques, 265
 Dicey, Albert Venn, 91
 discretionary economic citizenship, 31
 discrimination, inherent in
 citizenship, 103
 ‘display of wealth’ investment options,
 392–393
 policy design, 384
 Dominica
 benefits of Commonwealth
 membership, 275
 CBI programme, 32
 fees as % of GDP, 390
 macroeconomic outcomes, 66
 non-refundable payment
 requirement, 383, 389
 value of, 371
 deprivation of nationality clause, 418
 Hurricane Maria and, 371
 Jordanian family acquires
 citizenship of, 109
 potential security risk, 402
 residence requirements, 34
 revocation of citizenship provision,
 424
 statelessness considerations, 433
 WTO sanctions against, 529
 Dominican Republic, 265, *see also*
 Haiti
 Douglas, Denzil, 490
 dual citizenship
 ancestry-based, 152, 298–299, 306
 comparison to bigamy, 295
 countries accepted by, 295–297
 countries prohibited by, 44–47, 52,
 297
 countries which changed their laws
 to permit, 284
 ethnicity-based, 299–301
 global inequality and, 290, 305, 317
 impact of the permissive shift, 308
 increased tolerance, 111, 295–297
 non-resident citizenship and, 297
 Nottebohm case and, 113
 potential costs of, 307
 strategic usefulness, 302, 305
 women and, 295
 Dubai, 74
 due diligence
 Canada, 493–498
 comparison with SKN, 498–499
 Kevin Sun case, 496–497
 criticisms of EU’s approach, 507–508
 enhanced due diligence (EDD), 487,
 507
 EU report and OECD
 recommendations, 499–508
 governance and accountability
 requirements, 506
 investment migration and the
 importance of, 485–509
 Malta’s response to EU concerns,
 503
 need for expansion, 508–509
 procedures, 117–121
 requirements for investor
 programmes, 486–488
 Saint Kitts and Nevis, 488–493
 comparison with Canada,
 498–499
 tax evasion, EU and OECD
 combating schemes, 504
 transparency standards, 505–506
 Durkheim, Émile, 241–242, 258
 Džankić, Jelena, 341, 346
 East Timor, independent status, 517
 economic potential of investment
 migration, 14–15
 economics of investor programmes,
 57–68, 388–396
 ‘display of wealth’ options, 392–393
 the financial transaction itself,
 388–393
 investment options, 61–65
 macroeconomic outcomes, 66–68
 methodological challenges, 57–61
 non-refundable payments, 388–390
 private sector business, 390–392
 residential property investments,
 393
 Ecuador, 271, 281
 Egypt, 12
 investment options, 27
 emerging economies, generation of
 wealth and, 40

- Empire Windrush*, and UK's treatment of *Windrush* families, 270–271
- empires, replacement by nation-states, 226
- engagement criteria, *see also* genuine link doctrine
 forms of, 386
- enhanced due diligence (EDD), 487, 507
- entrepreneur programmes, *vs* investor programmes, 381
- entrepreneurial/business visa, 31
- Estonia
 experiences of loss of citizenship, 84–85
 impact of the Euro crisis, 440
- ethnicity-based external citizenship, 299–301
- EU citizenship
 acquisition by Israelis, 305
 expenditure, 307
 the CBI market and, 38
 demand for, 303–305
 gatekeeping role of the ECJ, 181
 integrity of undermined by investor citizenship, 172, 193–194, 335
 introduction of the concept, 167
 investor interest in acquiring, 456
 as key draw of investor programmes, 49
 limitations on the deprivation of, 115
 Malta's investor programmes and, 403–404
 mitigation of criminality and, 179
 and national competences of Member States, 190
 populations of eligible individuals living outside the EU, 303
 potential for inheritance, 179
 proportionality principle and, 126, 174, 193
 relationship between nationalities of member states and, 187–194
 relationship with national citizenship, 200–201
 residence and, 200
 rights accruing from, 10–11, 276
 roots of, 257
 routes to acquisition, 164
 sincere cooperation principle and, 162, 178
 UK nationals' loss of, 187
- Euro crisis
 effects in Greece and Cyprus, 65, 439–440
 impact on inward foreign investment in Europe, 436, *see also* foreign direct investment (FDI)
 impact on Member States, 439–441
 investor programmes against the background of FDI and, 457–463
- European Commission, investor programmes, due diligence procedure, 120–121
- European Convention on Human Rights (ECHR), 97, 126, 170
- European Convention on Nationality (ECN), 169, 415
- European Court of Justice (ECJ), on the principle of state sovereignty in citizenship, 114
- European Union (EU), *see also individual Member States*
 annual revenue generated by investor programmes, estimate of, 463
 benefits of holding citizenship in a member state, 49–50
 concerns with investment migration programmes in Member States, 485
 constraints on incentivising FDI, 444–446
 criticism of Moldovan CBI programme, 485
 dual nationality and, 93
 due diligence report and OECD recommendations, 499–508
 EU citizenship, *see* EU citizenship
 Euro crisis, *see* Euro crisis
 evidence of countries reacting to the market when setting RBI prices, 40

- foreign direct investment and
 - investment migration programmes in, 436–464, *see also* foreign direct investment (FDI)
- investor programmes in Member States, 161–163
 - flourishing of, 436
 - list of, 437–438
- legal limitations on national
 - autonomy, 171–177
 - proportionality principle, 172–175
 - sincere cooperation principle, 175–177
- member states' immigration law reforms, 194
- membership and settlement freedom, 293
- nationality domain, 187–194
- populations eligible for EU citizenship, 303
- position on CBI practices, 112
- principle of conferral, 185–187
- Quality of Nationality Index and, 277
- RBI programmes
 - macroeconomic outcomes, 66–68
 - number of offered by Member States, 446
- recommendation that Member States “phase out” investment migration programmes, 110
- regulatory competition of Member States, 436
 - as race to the bottom, 455–457
- requirement for investors to maintain private health insurance, 58
- residence domain, 194–201
- side-effects of investor migration, addressing, 201–205
- State Aid rules, 444, 448, 464
- tax evasion, EU and OECD
 - combating schemes, 504
- value of EU investor programmes, 446–457
- exclusion
 - citizenship's relationship with, 11, 95, 96, 105, 107, 262, 269
 - relationship of investment citizenship and, 8
- extradition procedures, 121–125
- Fahrmeir, Andreas, 228
- Falkland Islands, 519
- family members
 - inclusion in applications for investor programmes, 42
 - revocation of citizenship and, 419, 423
- Favell, Adrian, 87
- Federal Republic of Germany, 189
- Federated States of Micronesia (FSM), sovereign status, 517
- Feinstein, Diane, 335
- Financial Action Task Force (FATF), 117, 486, 491
- financial investment, policy design options, 382–385
- Finer, Samuel, 244
- flag independence, definition, 282
- foreign direct investment (FDI)
 - comparison with investor programmes, 452
 - definition, 441
 - economic benefits, 441
 - EU competence transfer, 445
 - investment migration programmes against the background of FDI and the Euro crisis, 457–463
 - mode of entry into the host economy, 441
 - net inflows, **443**
 - post-financial crisis, 439–446, *see also* Euro crisis
 - dwindling flows, 441–442
 - EU constraints, 444–446
 - regulatory competition of EU Member States, 436
 - and the proliferation of investment migration programmes in Europe, 463–464
 - types of investment, 447

- foreign direct investment (cont.)
 value of EU investor programmes,
 446–457
 demand side of the market and,
 450–455
 as means to attract foreign capital,
 447–450
 regulatory competition as a race
 to the bottom, 455–457
- France
 business visa programme, 31
 citizenships granted for exceptional
 talent, 254
 exclusion of St. Domingue’s
 racialised population from
 French citizenship, 272
 nationality ranking, 279
 net outflows of HNWIs, 364
- fraud
 criminality or and naturalisation,
 411, 416–418, 426–427, 490,
 492
 fraudulent acquisition of passports
 in Bulgaria, 116
 permissibility of statelessness in the
 case of, 415–417
 revocation of citizenship for false
 representation and, 415–419
 in US business visa programme, 391
- French National Court of Asylum Law,
 124
- French Revolution, 225, 228, 262
 nation-state model and, 285
- Fu Yaobo, 426
- Galizia, Daphne Caruana, 499
- Gamlén, Alan, 380, 392
- Ganty, Sarah, 87
- Gaza Strip, Israel’s artificial island
 proposal, 510
- genuine link doctrine
 assessment challenges, 386
 and autonomy in matters of
 nationality, 165–168
 ECJ ruling, 168
 and compatibility of naturalisation
 with international law, 115,
 135
- concept of, 163, 346, 386, 483
 criticisms, 183
 deviation of CBI from, 112
 elasticity, 153
 European Commission’s adherence
 to, 121
 examples of evidence, 386
 exclusion of persons from benefit of
 diplomatic protection, 153
 implication, 346
 legal derivation, 112
 legal requirement, 114
 Maltese investor programmes and,
 403–404
Micheletti case and, 167
 myth of, 146–150
Nottebohm case and, 17, 112–113, 163,
 166–167, 181, 236
 practical importance, 115
 not required for attribution
 of nationality under
 international or EU law, 179
 scholarly debate, 113
- Georgia, Russian invasion, 301
- Germany, 442
 criteria for determining citizenship,
 230
 definition of ‘nationals’, 189
 entrepreneurial migration
 programme, 33
 experiences of loss of citizenship, 84
 Nürnberg laws, 85
 preferential citizenship-and-
 immigration policies, 298
 reform of immigration legislation,
 194
- Gibney, Matthew J, 418
- The Gift Relationship* (Titmuss), 355
- global capitalist dynamics, colonial
 institution of citizenship
 and, 259–283
- Global Compact for Migration (UN),
 467
- global financial crisis, impact on
 inward foreign investment
 in Europe, 436, *see also*
 Euro crisis; foreign direct
 investment (FDI)

- global inequality
 CBI industry and, 303–307
 citizenship and residence rights as vehicles of, 284–308
 citizenship as key to, 285–294
 as driver of demand for dual citizenship, 305
 GDP of OECD vs Sub-Saharan and South Asian countries, 286
 key nexus of, 8
 global South, European invention, 260
 global wealth, uneven pace of growth, 74
 Gonsalves, Ralph, 335
 ‘good citizen’ narrative, 88, 89
 government donation, countries requiring as part of a qualifying package, 27
 Greece
 acquisition of permanent residence, 196
 co-ethnic citizenship policy, 300
 demand for RBI, 45
 financing options, 60
 impact of the Euro crisis, 439
 investment options, 63, 65
 minimum investment amount, 39
 nationality of investment residence permit holders, 452
 residential property investment model, 385, 393
 social welfare protections, 58
 sovereign debt crisis, 65
 tax residence status, 131
 Grenada
 benefits of Commonwealth membership, 275
 CBI programme, 32
 deprivation of nationality clause, 418
 investment options, 27, 62
 non-refundable payment requirement, 383
 revocation of citizenship provision, 420, 424
 Guadeloupe, 275
 Guatemala, and the *Nottebohm* case, 112
 Guernsey, residency requirements, 531
 Hague Convention on Certain Questions Relating to the Conflict of Nationality Laws (1930), 142, 168–169, 411
 Haiti
 as new home for African Americans, 265
 right of residence, 268
 Haitian Revolution, 226, 260, 262–263
 Harpaz, Yossi, 3, 89, 256, 382, 401
 Harper, Stephen, 490
 Harris, Timothy, 491
 Hasheminejad, Ali Sadr, 492, 500
 Hellman, Deborah, 329
 Henley & Partners, 276
 Henley & Partners, Passport Index, 288
 Hidalgo, Javier, 356–357
 high net worth individuals (HNWIs)
 defining, 363
 estimated percentage holding second passports/dual nationality, 364
 international mobility, *see* tracking migration of the wealthy
 risk profile, 487
 Hipa, Richard, 532
 Hirschl, Ran, 245, 253, 254, 348, 353, 399
 historical perspectives
 acquiring citizenship in early modern Europe, 216–219
 community perspective, 219–221
 seventeenth-century Amsterdam, 210–216
 citizenship and community, 219–222
 citizenship for sale in pre-modern Europe, 209–222
 citizenship in the ancient world, 223–224
 citizenship in the Middle Ages, 225
 discrimination against women, 219
 emergence of the modern nation-state, 225

- historical perspectives (cont.)
 French Revolution, 225, 228, 262
 nation-state model and, 285
 political rights, 226–227
 religion, as obstacle to acquisition of citizenship, 218
 replacement of empires by nation-states, 226
 sale of noble titles, 251, 318
 slavery, *see* slavery
 traditional understanding of citizenship, 240
- Hong Kong, 278
 origins of the investment migration market, 35
- Horne, Gerald, 264
- human rights
 citizenship rights and, 85–87, 180
 gradual extension of, 86
 increasing importance of, 91
 investor citizenship and, 352
 ‘offshoring’ practices and, 527
 and revocation of citizenship, 411, 421–423
 statelessness and, 126, 170
 worldwide acceptance, 74
- Hun Sen, 500
- Hungary
 co-ethnic citizenship policy, 299–300
 Hungarian Residency Bond
 anti-migration rhetoric *vs* preferential system, 467–471
 background, 465–467
 birth of, 471–472
 circumvention of normal procedure in rules adoption, 473
 described as textbook example of state corruption, 483
 designated companies
 choice of, 474–476
 status of, 476–477
 economic perspective, 479–482
 investors, 477–479
 legal structure and critical elements, 472–482
 state capture and, 465–466, 482–484
 impact of the financial crisis, 440
 investment options, 27
 naturalisation of non-residents of Hungarian ancestry, 401
 numbers acquiring ancestry-based dual citizenship, 303
 plebiscitary leader democracy, 466
 RBI programme, freezing of, 45
 systemic corruption, 466
- ‘imagined community’, 219, 325
- immigrant investor visa programmes, and the roots of investment citizenship policies, 301–302
- independence, subnational jurisdictions and, 511, 516–525
- India
 growth in average incomes, 290
 net outflows of HNWIs, 364
 prohibition of dual citizenship, 297
- institutional malpractice, and revocation of citizenship, 417
- instrumental citizenship
 citizenship by investment, 250–255
 civil association *vs* enterprise association, 246–250
 criticisms, 245
 legal individualism, 255–258
 “Olympic Citizenship”, 254
 Roman legal model *vs* Greek political model, 240, 243–246
 trend toward in (neo)liberal societies, 240
- International Court of Justice (ICJ), 1, 161
 ruling in the *Nottebohm* case, 112–123
- international law
 of citizenship, 142–243
 and investment citizenship, 137–160
 investor citizenship and state sovereignty in, 109–136, *see also* investment citizenship
 limitations, 150–153
 on national autonomy, 168–171

- and non-consensual attribution of
 - Comoros citizenship to Gulf state Bidoons, 138, 139, 150
 - and Russia's mass naturalization of residents of Crimea, 150
- international migration
 - focus of economic literature, 361
 - talent-based, 361–362
 - of wealthy individuals, 362, *see also* tracking migration of the wealthy
- International Monetary Fund (IMF), Antigua's challenge, 15
- investable net wealth, examples of, 363
- investment citizenship, *see also* investor programmes
 - abuse of schemes, examples of, 116
 - acquisition of citizenship, examples of, 109
 - analysis of international law, 142–143
 - commodification objection to, *see* anti-commodification arguments
 - comparison with naturalisation, 346
 - criticisms, 138–142, 337, *see also* anti-commodification arguments
 - due diligence procedures, 117–121
 - in EU Member States, 161–163
 - extradition procedures, 121–125
 - genuine link doctrine
 - Micheletti* case and, 149
 - myth of, 146–150
 - Nottebohm* case and, 146–150
 - international law and, 137–160
 - limitations, 150–153
 - ironies of State sovereignty and, 134–136
 - market discipline, 154–159
 - naturalisation, consent
 - requirements, 143–145, 158
 - policy roots, 301–302
 - potential negative side-effects, 183
 - relationship with exclusion, 8
 - revenues as significant share of GDP, 137
 - revocation procedures, 125–129, *see also* revocation of citizenship
 - security considerations, 116–129
 - state sovereignty and, 110–115
 - and tax planning, 130–134
 - as threat to socio-philosophical foundations of citizenship as an institution, 137
 - valuation metric, 154
 - violation of consent condition, 138
 - vulnerability to abuse, 159–160
- investment migration, 223
 - Canadian scheme, 10
 - commissions and, 60–61
 - component parts, 29
 - contemporary scene
 - CBI demand, 42–44
 - drivers of demand, 40
 - methodological issues, 41–42
 - motives for investment, 48–51
 - RBI demand, 45–48
 - supply, 35–40
 - defining, 27–30
 - differences between citizenships as driver of the industry, 99
 - economic impact, 57–68
 - investment options, 61–65
 - macroeconomic outcomes, 66–68
 - methodological challenges, 57–61
 - economic potential, 14–15
 - empirical developments and methodological issues, 25–69
 - empirical research, 25–27
 - EU competences, 183–206
 - conferral of powers, 185–187
 - nationality domain, 187–194
 - residence domain, 194–201
 - side-effects of investor migration, addressing, 201–205
 - EU recommendation that Member States “phase out” programmes for, 110
 - European Commission's 2019 Report on, 101
 - as an expression of national autonomy in matters of nationality, 161–182
 - fees and, 61
 - financing and, 60
 - as a growing phenomenon, 1–16
 - the industry, 51–57, 237–239

- investment migration (cont.)
 and inequality, 12–14
 moving from North to South, 68–69
 and political membership, 11
 possibilities for misuse, 15
 programme types
 citizenship by investment, 32–34
 discretionary economic citizenship, 31
 entrepreneurial/business visa, 31
 residence by investment, 31
 relationship with migration per se, 3–4
 residency requirements, 237
 secondary spending and, 58
 social welfare perspective, 57
 taxation and, 58–60
 as threat to the institution of citizenship, 238
 transnational lives of investment migrants, 10
- Investment Migration Council (IMC), 157
- investor programmes
 against the background of FDI and the Euro crisis, 457–63
 comparison of economic crisis and, **459–461**
 comparison with FDI, 452
 criticisms, 396–400, 402–403
 definition, 437
 due diligence requirements, 486–488
 economic impact, examples of, 388
 entrepreneur programmes vs, 381
 estimate of annual revenue generated in the EU, **463**
 EU Member States, 161–163
 flourishing of, 436
 list of, 437–438
 nationality of investment residence permit holders, 452–453
 non-economic benefits, 453–455
 potential for success, 377–407
 potential negative externalities, 462
 proliferation in Europe, 463–464
 and subnational jurisdictions, 525–533
 variety of financial transactions required by, 447
- Iran, 118
- Ireland
 Anti-Tax Avoidance Directive and, 504
 discretionary economic citizenship practices, 32
 financing options, 60
 impact of the Euro crisis, 439
 investment options, 27
 investor programme, non-refundable payment requirement, 383
 minimum investment amount, 40
 RBI programme, 31
 social welfare protections, 58
- Isin, Engin, 83
- Islamic State, 512
- Israel
 acquisition of EU citizenship by Israelis, 305
 artificial island proposal for Gaza, 510
 cost of obtaining ancestry-based EU citizenship in, 307
 Law of Return, criminal abuse of, 116
 preferential citizenship-and-immigration policies, 298
- Italy
 external citizenship policy, 301
 impact of the Euro crisis, 440
 investor programme, non-refundable payment requirement, 383
 numbers acquiring ancestry-based dual citizenship, 303
 reform of immigration legislation, 195
 residence permits, 198
- Jamaica, 273
- James I, 318
- Japan, prohibition of dual citizenship, 297
- Jaworski, Peter, 338
- Jho, Low Taek (aka Jho Low), 492
- Johnson, Boris, 59
- Johnson, Lyndon, 226

- Johnston, Laura, 353
 Joppke, Christian, 4, 76, 93, 352
 Jordan, 12
 CBI programme, 32
 minimum investment amount, 39
jus soli citizenship, 152
- Kälin, Christian H, 178, 277, 288, 367
 Katz, Yisrael, 510
 Kelsen, Hans, 249–250
 Kerr, Sandy A, 512
 Keyssar, Alexander, 226
 Khoury, Atiya, 479
 Kochenov, Dimitry, 230, 256, 267, 277, 288, 367
 Körösenyi, András, 465–466
 Korzeniewicz, Roberto Patricio, 267
 Kurdi, Alan, 325
- labour mobility, benefits, 327
 Latin America, *see also individual countries*
 naturalisation by operation of law, 143–145
 post-independence definition of national citizenship in, 268
 push factors for HNWIs migration, 369
 Latvia
 experiences of loss of citizenship, 84–85
 impact of the Euro crisis, 440
 investor programme, non-refundable payment requirement, 383
 minimum investment amount, 39
 nationality of investment residence permit holders, 453
 RBI programme
 interest from Russian nationals, 46
 rolling back of, 45
 residence requirements, 34
 residential property investment model, 385, 393
 legal individualism, 255–258
 legitimacy of selling citizenship, 223–239
 and the acquisition of citizenship, 230–234
 the disadvantaged and, 231
 economic value of potential immigrants and, 234
 and the emergence of the modern nation-state, 225
 and the investment migration industry, 237–239
 political rights and, 226–227
 residency requirements and, 237
 and rights associated with citizenship, 228–229
 rights of citizens and, 224–225
 sacred conception of citizenship and, 223–224
 liberalism, liberty and, 246
 Liberia, establishment of the colony, 265
 Liechtenstein, citizenship acquisition legislation, 1
 Lim, Desiree, 328–333
 Lindeboom, Justin, 74, 81
 Lisbon Treaty, 444–445
 Lithuania, impact of the Euro crisis, 440
 Lockward, Alanna, 265
 London, access to citizenship in the sixteenth century, 217
 Lorde, Audre, 280
 L'Ouverture, Toussaint, 263
 Luxembourg
 anti-tax avoidance directive and, 504
 financing options, 60
 investment options, 27
 residence permits, 198
- Maastricht Treaty (1992), 185
 Macedonia, citizenship industry, 306
 Macklin, Audrey, 113, 428
 Malaysia
 minimum investment amount, 39
 RBI programme, 31
 desirability, 45
 freezing of, 45
 nationalities interested in, 46

- Malta
 commission system, 61
 cost of citizenship, 38–39
 economic comparison with Cyprus, 462
 EU association as driver of citizenship value, 158
 European Parliament 2014 Resolution on, 101
 Galizia murder, 499–500
 international mobility of passport holders, 251
 investment migration industry, 237
 investment options, 27, 62
 investor programmes, 15, 32, 34, 37, 114, 134, 140
 aims according to the website, 400
 comments on, 397
 drivers of demand, 49
 due diligence procedure, 118, 120, 503
 European Parliament's concerns, 328
 EU's challenge, 138, 140–141, 162–163
 historically available programmes, 30
 legality of, 134
 macroeconomic outcomes, 66
 methodological issues, 41
 non-refundable payment requirement, 383, 388
 political perspective, 403–404
 residency requirements, 141
 valuation metric, 154
 privileged naturalisation, 178
 rejection rate, 41
 residence requirements, 34
 residential property investment model, 385
 revocation of citizenship provision, 418, 420, 424
 statelessness considerations, 433
 Yemeni family acquires citizenship of, 109
 market imperialism, 338
 market relations, five main norms, 347
 markets, moral limits of, 338–359
- Markets Without Limits* (Brennan & Jaworski), 338
 Marshall, TH, 98
 Martinique, 275
 Marx, Karl, 226
 Mau, Steffen, 291
 Mauritius
 CBI programme, 32
 residence requirements, 34
 Mavelli, Luca, 318
 Mayotte, 281, 516
 McConnell, Allan, 378
 Mexico, 269, 271
 naturalisation by operation of law, 143
 rebellion in (1810), 265
 Zapatistas' uprising, 271
 Middle East, demand for CBI, 40, 44
 migration of the wealthy, drivers of, 361–374, *see also* tracking migration of the wealthy
 Milanović, Branko, 77, 99, 274, 286, 327
 military service, and the acquisition of citizenship, 236
 Miller, David, 311
 mobility
 relationship with wealth, 13, *see also* tracking migration of the wealthy
 value of for investors, 28
 Moghadam, Alizera, 490
 Moldova, CBI programme, 37, 302
 drivers of demand, 49
 EU criticisms, 485
 suspension, 485
 money laundering
 anti-money laundering regulation requirements, 117
 EU concerns, 116, 141, 184, 462, 486, 501
 EU efforts to combat, 202–203
 Hungary's investor programme and, 475, 476
 subnational jurisdictions and, 486–487, 490–492, 496, 498, 507
 susceptibility of investor programmes to, 334, 402
 “Vancouver Model”, 496

- Montenegro
 CBI programme, drivers of demand, 49
 revocation of citizenship provision,
 420, 424
 statelessness considerations, 433
 moral limits of markets (MLM)
 the concept, 338–340
 the debate, 336–337
 Sandel's argument, 252
 morality of selling citizenship, 99–105
 Moran, Timothy Patrick, 267
 Mueller, John, 12
 Muller, Karis, 282
 multiple citizenships, permissive shift
 in relation to, 295
- naked transactions, risks of, 396–400
 Napoleon, 263
 Nariskin, Sergey, 479
 national autonomy in matters of
 nationality
 codification of the principle of
 'national autonomy', 161
 genuine link doctrine and, 165–168
 internal aspect vs international, 165
 international human rights law and,
 170
 legal perspectives of EU investment
 migration and, 177–180
 limitations
 EU law, 171–177
 proportionality principle,
 172–175
 sincere cooperation principle,
 175–177
 international law, 168–171
 'membership of the club' and,
 180–182
 and the *Micheletti* case, 167
 and the *Nottebohm* case, 165–167
 'nationals', definition of the term, 189
 nation-states
 emergence of the model, 225
 growth of the model, 285
 replacement of empires by, 226
 Native Americans
 forceful elimination, 267
 granted citizenship, 266
- naturalisation
 comparison with investment
 citizenship, 346
 conditional citizenship and,
 429–432
 consent requirements, 143–145, 158
 dual citizenship and, 296–297
 due diligence procedures, 117, 135
 in early modern England, 209–210
 eligibility of immigrant investors, 302
 equality and, 13–15
 in exchange for investment or
 donation, compatibility with
 international law, 115, 135
 in exchange for military service, 353
 exemption from requirements
 provided by investment or
 donation, 109
 facilitated, 529–530
 fairness and, 358
 fast-tracking for Olympic talent, 245
 fraud/criminality and, 411, 416–418,
 426–427, 490, 492
 functions served by, 102
 historical perspective, 209
 'integration' rationale, 87–88, 101
 international law perspective, 112,
 141–142, 150–151, 179, 432
 by investment vs citizenship by
 birth, 354
 measuring connection to the
 existing community, 386, *see*
also genuine link doctrine
 non-consensual
 attribution of Comoros
 citizenship to Gulf state
 Bidoon, 138, 139, 150
 Russia's mass naturalization of
 residents of Crimea, 150
 normal conditions for, 401
Nottebohm case, 82, 112–113, 146–147,
 181
 by operation of law
 Argentina, 143
 Brazil, 143
 children, 145
 Latin America, 143–145
 Mexico, 143

- naturalisation (cont.)
 Peru, 143
 women, 145
 physical presence requirements, 32
 potential for confidentiality, 9
 practices in EU Member States, 187
 privileged, 161–162, 168, 178–179
 relationship with the state, 142, 344, 346, 349, 353
 residence requirements
 Anguilla, 532
 EU proposals, 121
 lifting of, 251
 Malta, 403
 revocation of citizenship by,
 potential for, 125–127
 as route to citizenship, 233–236, 255
 of slaves in ancient Rome, 245
 stakeholder citizenship and, 81–82
 and the potential for discrimination, 418
 and third country benefits, 49–50
 volitional, principle of, 17
 Nauru, 527
 discretionary economic citizenship practices, 32
 Ndvolu-Gatsheni, Sabelo, 260
 Netherlands
 buying citizenship in seventeenth-century Amsterdam, 210–216, 219–221
 dramatic increase in Surinamese emigration to, 273
 nationality legislation, 192–193
 RBI programme, 31
 Netrebko, Anna, 330
 New York Convention on the Nationality of Married Women (1957), 169
 New York Convention on the Reduction of Statelessness (1961), 169
 New Zealand
 business experience requirements, 395
 discretionary economic citizenship practices, 32
 Nicaragua, discretionary economic citizenship practices, 32
 Nigeria, demand for CBI, 40
Night Watch (Rembrandt), 220
 Niue
 keeping for Niueans, 533
 rejection of independence, 516
 relationship with New Zealand, 522–525
 residency requirements, 530–531
 noble titles, history of the sale of, 251, 318
 non-refundable payments, 388–390
 policy design options, 383
 North Korea, 118
 Northern Macedonia, CBI programme, 32
Nottebohm case, 146
 and dual citizenship, 113
 and genuine link doctrine, 17, 112–113, 146–150, 163, 166–167, 181, 236
 Guatemala and, 112
 ICJ ruling, 112–113
 national autonomy in matters of nationality and, 165–67
 naturalisation and, 82, 112–113, 146–147, 181
 Rayner Thwaites on, 150
 rejection of judgment by the International Law Commission, 149
 Oakeshott, Michael, 246, 249
 “Olympic Citizenship”, 245, 254
 “Olympic Citizenship”, Lim’s critique, 329
 Orbán, Viktor, 465–466
 Organization of Economic Cooperation and Development (OECD)
 due diligence recommendations, 499–508
 tax evasion, EU and OECD combating schemes, 504
 Orlando, Anthony, 372
 Ostrom, Elinor, 322
 Otherness, institutionalization of, 268
 Ownbey, Carolyn, 513

- Paine, Thomas, 254
 Palau, sovereign status, 517
 Palermo Convention, 122
 Panama
 discretionary economic citizenship
 practices, 32
 RBI programme, participants'
 nationalities, 46
 passport apartheid, 72, 100
 Pavlov, Sergei, 492
 Peace of Augsburg (1555), 225
 Pericles, 245
 Permanent Court of International
 Justice (PCIJ), 111, 163
 personal commitment
 policy design options, 385–387
 requirements, 394–96
 ‘personhood’, replacement of
 citizenship by, 95–99, 108
 Peru, naturalisation by operation of
 law, 143
 physical presence requirements, 386
 Pilatus Bank, 500
 Pildes, Richard, 349
 Pocock, John G.A., 245
 policy performance of investor
 programmes, 377–407
 conflict between political and
 economic objectives, 405–407
 defining success and failure,
 378–380
 economic perspective, 388–396
 ‘display of wealth’ options,
 392–393
 the financial transaction itself,
 388–393
 investments in residential
 property, 393
 non-refundable payments,
 388–390
 personal commitment
 requirements, 394–396
 private sector business, 390–392
 policy design options, 381–388
 ‘display of wealth’ policies, 384
 financial investment, 382–385
 investment in residential
 property, 385
 non-refundable cash payments,
 383
 personal investment, 385–387
 private sector business, 384
 status on offer, 387–388
 political perspectives, 396–404
 Maltese programme, 404
 residence requirements and
 citizenship, 400–404
 risks of naked transactions,
 396–400
 security threats and undesirable
 actors, 402–403
 political participation, of investor
 citizens, in selected
 countries, 11–12
 politics of investor programmes,
 396–404
 Maltese programme, 404
 residence requirements and
 citizenship, 400–404
 risks of naked transactions, 396–400
 security threats and undesirable
 actors, 402–403
 Porat, Iddo, 97
 Portugal
 acquisition of permanent residence,
 196
 ‘display of wealth’ policy, 384, 392
 immigrant investor visa
 programme, 302
 impact of the Euro crisis, 439
 investment options, 27, 63
 job creation requirements, 391
 nationality of investment residence
 permit holders, 452
 RBI programme, 31
 residence requirements, 34
 residential property investment
 model, 385, 393
 tax residence status, 132
 prejudicial behaviour, and revocation
 of citizenship, 420–423
 premium citizenships, 276
 pre-modern Europe, citizenship for
 sale in, 209–222, *see also*
 historical perspectives
 Preuß, Ulrich, 247

- Prinsen, Gerard, 511
 prison-cell upgrades, 252
 private health insurance, EU
 requirement for investors to
 maintain, 58
 private sector business
 economic perspective, 390–392
 policy design options, 384
 Puerto Rico, 273–275, 281–282
 rejection of independence, 516
- Quality of Nationality Index (QNI),
 277, 279
 and international mobility of the
 wealthy, 367
- Quebec
 CBI programme
 moratorium, 486, 498
 non-refundable payment
 requirement, 389
 immigrant investment programme
 (QIIP), 495
- Quentin-Baxter, Alison, 519
 queue-jumping, examples of, 338
- “racialized citizenship”, Athenian
 citizenship as precursor of,
 245
- Radin, Margaret, 349, 350
 Reding, Viviane, 309, 335
 refugee, definition, 232
 regulatory competition
 of EU Member States, 436
 as a race to the bottom, 455–457
 types of regulatory effects, 455
 religion, as obstacle to acquisition of
 citizenship, 218
- Ren Biao, 121, 124–125
 Republic of the Marshall Islands
 (RMI), sovereign status, 517
- residence, comparison with
 citizenship, 2–4, 29
- residence by investment (RBI), 31, *see*
 also investor programmes
 concept of, 26
 counting issues, 36
 drivers, 36
 minimum investment amounts, 39
 OECD definition, 315
 residence requirements
 Antigua & Barbuda, 34
 Australia, 34
 Canada, 34
 citizenship by investment, 237
 Cyprus, 34
 Dominica, 34
 Guernsey, 531
 investment migration, 237
 Latvia, 34
 and legitimacy of selling citizenship,
 237
 Malta, 34, 141, 403
 Mauritius, 34
 for naturalisation
 Anguilla, 532
 EU proposals, 121
 lifting of, 251
 Malta, 141, 403
 Niue, 530–531
 political perspectives, 400–404
 Portugal, 34
 Saint Kitts and Nevis, 34
 Turks and Caicos Islands, 532
 United Kingdom, 34
 United States, 34
- residential property investment
 option, 393
 policy design, 385
- revocation of citizenship, 408–35,
 see also deprivation of
 citizenship/nationality
 conditional citizenship and,
 429–432
 conditions for, 409–415
 criminality
 accusation and conviction,
 424–429
 recent examples, 426–427
 defence of, 434–435
 denaturalisation provisions in CIP-
 operating states, **413–414**
 examples, 409–10
 fraud and false representation,
 415–419
 human rights perspective, 411,
 421–423

- institutional malpractice and, 417
Lihua Tian case, 416–417, 431
 prejudicial behaviour, 420–423
 procedures, 125–129
 and the proportionality principle, 422
 spouse and dependent children, 419, 423
 statelessness, *see also* statelessness considerations of, 412, 432–434
 permissibility in the case of fraud, 415–417
 US court cases, 416
 ‘war-against terror’ and, 410
 “Rights of Colored Men to Suffrage, Citizenship, and Trial by Jury” (Yates), 266
 Roman model of citizenship, *vs* Greek model, 240, 243–246
 Romania
 CBI programme, 32
 co-ethnic citizenship policy, 300
 numbers acquiring ancestry-based dual citizenship, 303
 residence permits, 198
 Roy, Suryapratim, 73, 100
 Russia
 annexation of Crimea, 150, 512
 co-ethnic citizenship policy, 301
 demand for CBI, 40, 44
 increase in number of billionaires, 275
 increase in number of millionaires, 450
 mass naturalisation of residents of Crimea, 150
 net outflows of HNWIs, 364
 push factors for HNWIs migration, 368–369
 Ruyter, Michiel de, 213
 sacred conception of citizenship, 99, 224, 235, 237–242
 Saint Kitts and Nevis (SKN)
 Canada’s revocation of automatic visa-free entry, 156, 398, 490
 CBI programme, 32
 demand for, 44
 due diligence, 488–493
 reforms, 491
 economic contribution, 529
 EU’s concerns, 491–493
 fees as % of GDP, 389
 impact of Canada’s withdrawal of visa-free access, 156
 initiation, 275
 introduction, 528
 IPSA International review, 490
 macroeconomic outcomes, 66
 non-refundable payment requirement, 383
 reliance on visa-free access to the EU, 155
 US advisory against, 490
 due diligence, comparison with Canada, 498–499
 exclusion of investor citizens from the franchise, 12
 extradition case, 121, 125
 Hurricane Relief Fund, 400
 investment migration industry, 237
 investor citizenship programme,
 economic benefits, 15
 net inflows of HNWIs, 364
 residence requirements, 34
 revocation of citizenship provision, 424
 Saint Christopher and Nevis
 Citizenship Act (1984), 488
 terminates licence of CBI processing agency in Dubai, 417
 visa-free access to other countries, 362
 Saint Lucia
 CBI programme, 32, 37
 revocation of citizenship conditions for, 418
 investor citizenship, 125
 provision, 421, 425
 Saint-Domingue (Haiti), revolution, 226, 262–263
 Samoa, 527
 Sandel, Michael, 252, 338, 397
 Sarmiento, Daniel, 171
 Satz, Debra, 339
 Schengen Area, visa-free access to as key draw of CBI programmes, 49

- Schiller, Friedrich, 254
 Schinkel, Willem, 87
 Scott, Dred and Harriet, 266
 Second World War, 1
 security risks of CBI, EC focus, 115–116
 security threats and undesirable actors, 402–403
 selling citizenship
 legitimacy of, *see* legitimacy of
 selling citizenship
 morality of, 99–105
 September 11, 2001 terrorist attacks, 488
 Serbia
 citizenship industry, 306
 co-ethnic citizenship policy, 300
 settler colonies, 229, 262
 sex, non-discrimination on the basis
 of, in the contemporary
 world, 74
 Shachar, Ayelet, 76, 99, 231, 253, 254,
 309–310, 323, 341, 348, 351,
 353, 356, 397, 399, 401
 Shariff, Ahmed, 516
 Sharpston, Eleanor (Advocate
 General), 2
 Siedentop, Larry, 77
 Singapore
 business experience requirements,
 395
 business visa programme, 31
 private sector investment
 opportunities, 384
 Sitharaman, Nirmala, 116
 slavery
 abolition of, 226, 263
 in the ancient world, 224, 244
 comparison with citizenship, 72, 77,
 89, 106
 Haitian revolution and, 262–263,
 265
 immorality, 78
 legacy of in the US, 266–267
 prohibition of selling oneself into,
 350
 Slovenia, experiences of loss of
 citizenship, 84
 small island jurisdictions, failures of
 independence referenda, 516
 social equality, Walzer's pluralist
 theory, 340
 Somers, Margaret, 324, 359
 South Africa, 286
 apartheid 'homelands', 85
 demand for CBI, 40
 Spain
 'display of wealth' policy, 384, 392
 immigrant investor visa
 programme, 302
 impact of the Euro crisis, 439
 investment options, 63
 numbers acquiring ancestry-based
 dual citizenship, 303
 preferential citizenship-and-
 immigration policies, 298
 residential property investment
 model, 385, 393
 Spiro, Peter J, 177, 223, 352, 386, 530
 St. Lucia, 265
 St. Vincent, 273
 'stakeholder citizenship', 80–83
 personhood and, 98
 statelessness
 comparison with citizenship, 75
 considerations in revocation of
 citizenship, 412, 432–434
 definition, 432
 forbidding of loss of nationality
 resulting in, 169
 human rights perspective, 126,
 433–434
 mitigation of, 433–434
 New York Convention on the
 Reduction of Statelessness
 (1961), 169
 principle of proportionality and, 434
 revocation of citizenship resulting
 in, permissibility in the case
 of fraud, 415–17
 Statelessness Convention (1961), 415,
 433
 status on offer, policy design options,
 387–388
 Stephan, Beatriz González, 268
 streetlight effect, 8, 19
 concept of, 310
 Stronach, Frank, 343

- subnational jurisdictions, 510–534
 attractions, 530
 benefits of high quality citizenship, 524–525
 benefits of the status, 512
 competitive advantage, 515–516
 concept of, 510–516
 earmarking of territory for specialized services, 524
 and the exploitation of tax regimes, 526
 importance of citizenship and, 512–514, 518–523
 independence and, 511, 516–525
 investor citizenship and, 525–533
 Israel’s artificial island proposal for Gaza, 510
 Sumption, Madeleine, 6, 106, 370
 Sun, Kevin, 496–497
 super-citizenship
 benefits of, 72–73, 100
 decolonisation and, 92
 relationship with stakeholder citizenship, 81, 83
 requirements for elevation of a victim of citizenship to, 78, 89, 100, 106
 Surak, Kristin, 2, 73, 237, 370
 Suriname, 273
 post- independence performance, 516
 Swan, John, 518
 Tafira, Kenneth, 260
 talent-based migration, Lim’s critique, 328–333
 Tanasoca, Ana, 251, 318–323, 342, 351, 354
 tax evasion
 EU and OECD combating schemes, 504
 EU concerns, 141, 184, 202, 462, 501
 investment migration as vehicle for, 16, 116, 130, 136, 184, 337, 498
 tax planning, investment citizenship and, 130–134
 territory, importance of, 89–95
 terrorism, combating of financing requirements (CFT), 117
 Thailand, RBI programme, 31
 nationalities interested in, 48
 Thiel, Peter, 31
 Thwaites, Rayner, 150
 Tian, Lihua, 416–417, 431
 “ticket scalping”, 252
 Tilly, Charles, 225
 Titmuss, Richard, 338, 355
 Tocqueville, Alexis de, 225
 Tokelau, relationship with New Zealand, 523
 Tolstoy, Leo, 82
 Tonga, 15, 527
 Torpey, John, 76
 Tóth, Judit, 470
 tracking migration of the wealthy, 361–374
 defining the relevant population, 363–364
 distributive effects of immigration, 372–373
 impact on property prices, 371–372
 inflows of HNWIs (2017), **365, 366**
 investable net wealth, examples of, 363
 investment migration programmes, 370–372
 mobility corridors, 364
 origin countries of wealthy people on the move, 364
 outflows of HNWIs (2017), **365, 366**
 preferred destination countries, 364–366
 influencing factors, 367–368
 push factors for emigration, 368–370
 sources of wealth, 362
Tragedy of the Commons (Hardin), 322
 Transkei, 85
 Transnational Organised Crime Convention (2000), 122
 treason, 129, 411, 420, 423–424
 replaced by “sedition” laws, 258
 Tristan da Cunha, 518
 Trouillot, Michel-Rolph, 264
 Trump, Donald, 227, 273
 Tully, James, 86
 Tunis and Morocco Citizenship Decrees, 111, 163

- Turkey, 12
 CBI programme, 32, 37
 immigrant investor visa programme, 302
 investment options, 27, 64
 minimum investment amount, 39
 motives for acquiring citizenship in, 42
 net outflows of HNWIs, 364
 recent explosion of interest in, 42
 revocation of citizenship provision, 426
- Turks and Caicos Islands
 and eligibility for British Overseas Territory Citizen (BOTC) passport, 531
 residency requirements, 532
- Ukraine, and Russia's 'passportization' policy, 301
- United Arab Emirates
 net inflows of HNWIs, 364
 purchase of Comoros citizenship, 138, 139–440
- United Kingdom (UK)
 benefits from investment residence scheme, 15
 British Nationality Act (1948), 270
 British Social Attitudes survey on 'Attitudes to Immigration', 331
 definition of the term 'nationals', 189
 educational opportunities for the children of the wealthy, 368
Empire Windrush, 270
 experiences of loss of citizenship, 84
 financing options, 60
 Hong Kong residents and, 278
 investment options, 27, 63
 investor programme, physical presence requirement, 387
 investor visa auction recommendation, 397
 minimum investment amount, 39
 net outflows of HNWIs, 364
 potential security risk, 402
- RBI programme, 31
 reform of immigration legislation, 194
 residence requirements, 34
 tax residence policy, 394
 treatment of the *Windrush* families, 270–271
 Turkish Businessperson visa, 42
 UK nationals' loss of EU citizenship, 187
- United Nations
 Convention against Corruption (2003), 122
 Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 170
 Convention on the Reduction of Statelessness (1961), 126, 433–434
 High Commissioner for Refugees (UNHCR), 75
 Human Rights Charter, 421
- United States (US)
 American Colonization Society, 265
 business visa programme, 33, 297
 annual cap, 41, 45
 economic perspective, 390
 fraud in, 391
 business visa programme, 31
 citizenship industry, 306
 "Dreamers", 230
 enfranchisement, 226
 illegal immigrants, economic contribution, 233
 implementation of birthright citizenship, 265
 incentives to attract FDI, 444
 investment options, 64
 language of immigration law, 234–235
 legal battles for citizenship rights, 266
 military service as route to citizenship, 236
 minimum investment amount, 39
 net inflows of HNWIs, 364

- post-war extension of citizenship
 - rights and status to
 - populations of Caribbean colonies, 273
- premise of citizenship in, 262
- private-enterprise investments with
 - job creation requirements, 384
- protests against the systematic
 - infringements of the rights of indigenous peoples, 281
- residence requirements, 34
- revolution, 226
- slavery
 - abolition, 226
 - view of, 264
- tax residence policy, 59, 370, 394
- Voting Rights Act (1965), 226
- War of 1812 between Great Britain and, 143
- Universal Declaration of Human Rights (UDHR), 170, 171, 230, 411
- Uruguay, 269
 - tax residence status, 131
- value degradation, as argument
 - against commodification of citizenship, 347–355
- Vanuatu, 528
 - CBI programme, 37
 - drivers of demand, 49
 - legal provision, 29, 33
 - methodological issues, 41
- discretionary economic citizenship
 - practices, 32
- due diligence procedure, 120
- historically available programmes, 30
- INTERPOL membership, 120
- investment options, 62
- revocation of citizenship, examples, 426–427
- Venezuela, 268
 - net outflows of HNWIs, 364
- Venice, access to full citizenship, 217
- Venugopal, Rajesh, 323
- victims of citizenship, 70–108
 - the concept, 70–78
 - citizenship *vs* rights, 89–95
 - and the commercialisation of citizenship, 105–108
 - comparison of citizenships, 99
 - and core functions of citizenship, 84–89
 - ethnicity, 71
 - exclusion from the world, 89
 - invisibility of in citizenship studies, 78–83
 - morality of selling citizenship, 99–105
 - necessity of for sales of citizenship, 73
 - and the role of ‘personhood’, 95–99, 108
- Vietnam
 - demand for CBI, 40
 - investment options, 27
- Virgin Islands, 273
 - rejection of independence, 516
- Walzer, Michael, 340–341
- ‘war-against terror’, and revocation of citizenship, 410
- wealth
 - competition between countries to lure the wealthy, 1
 - relationship with mobility, 8, 13, *see also* tracking migration of the wealthy
- Weber, Max, 225
- Westphalian function of citizenship, 286
- Windrush* families, UK’s treatment of, 270–271
- women
 - Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), 170
 - denial of political rights in revolutionary France, 262
 - discrimination against, 219, 269
 - and dual citizenship, 295
 - enfranchisement in the US and France, 226

- women (cont.)
 extension of citizenship rights to, 77, 91
 limitations on citizenship rights, 86
 limitations on effects of marriage
 with respect to nationality, 169
 naturalisation by operation of law, 145
 New York Convention on the
 Nationality of Married
 Women (1957), 169
 recognition as minority group, 94
- wrong distribution, as argument
 against commodification of
 citizenship, 340–347
- Yates, William, 266
- Zapatistas' uprising, Mexico, 271
- Zhang Qingzhao, 426
- Zolberg, Aristide, 236
- Zucman, Gabriel, 367