

# *Investment Migration and the Ultra-High-Net-Worth Family: Options, Strategy, and the New Demand for Optionality*

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## **A Field Whose Moment Has Arrived**

Investment migration—the practice of obtaining legal residence or citizenship in another country through a qualifying financial investment—has existed for more than three decades. It began quietly in St. Kitts and Nevis in the 1980s, when a small island nation with limited economic resources recognized that granting citizenship rights in exchange for foreign direct investment could transform its infrastructure and improve the lives of its citizens. Today, more than 100 countries have enacted comparable legislation, with approximately 60 programs actively operating and a growing roster of advisory firms helping clients navigate the landscape.

For most of that history, the clients who pursued these programs came predominantly from emerging markets. They sought stronger passports, easier travel, access to better healthcare or education, and the kind of optionality that citizens of more powerful nations had long taken for granted. Americans, with one of the world's most powerful passports and a tradition of domestic stability, had little reason to explore such options.

That calculation has changed decisively. Henley and Partners, one of the world's leading investment migration advisory firms, recorded a 227% surge in inquiries from American clients during the COVID-19 pandemic—and that momentum has not subsided. Today, Americans represent the firm's largest national client base, and enquiry volumes from the United States have increased by approximately 1,000% over five years.

**“I can't believe I'm having this conversation. I've always lived in the United States, and I want to always remain living in the United States—but I'm feeling unsettled, and the way you mitigate risk is to have options.”**

That sentiment, heard repeatedly in client consultations, captures the central dynamic reshaping the investment migration market. It is not, for the most part, a story of emigration. It is a story of optionality: the recognition that in an uncertain world, having only one mobility option is itself a form of risk.

## **Why Families Are Seeking Alternatives**

The motivations driving wealthy American families to explore investment migration are varied, and rarely reducible to a single concern. Advisors working in this space describe a spectrum of client profiles, each with distinct objectives.

### **Mobility and the Pandemic Wake-Up Call**

The COVID-19 pandemic provided a striking demonstration of the vulnerability that comes with relying on a single passport. For over a year, international borders closed to American travelers. Private planes could not land. Vacation properties in Europe or the Caribbean sat empty and unreachable. Families who had assumed their wealth would always guarantee freedom of movement discovered, in practice, that it did not.

The experience prompted a fundamental reassessment. Even the most powerful passport in the world provides only the right to visit—not the right to stay. Under current European Union rules, non-resident Americans may remain in the Schengen area for no more than 90 days in any 180-day period. For families who dream of spending several months each year in France, Italy, or Spain, that limitation is not theoretical. It is a binding constraint.

### **Retirement and Lifestyle Planning**

A significant cohort of clients approaches investment migration not from a place of anxiety but from one of aspiration. They are planning for a retirement in which they intend to spend extended periods in other countries—and they need the legal framework to make that possible. An alternative residency in a European country, for example, can convert a 90-day visit into an unlimited right to live, without requiring full relocation or any change in primary tax residency.

### **Generational Legacy and the Long View**

Some clients are thinking not about their own retirement but about opportunities for their children and grandchildren—family members who may not yet exist. One client, described in the course of the conversation, had no grandchildren yet but had studied history carefully enough to feel uncertain about what the world might look like in 25 years. She was not seeking a plan for herself. She was seeking to protect generational opportunities for future members of her family.

This multigenerational perspective is particularly salient in families with direct experience of historical upheaval. A client whose family had fled the Holocaust spoke of the instinct for a backup plan as something embedded in their DNA—a disposition that younger generations, who have not witnessed comparable disruption, sometimes struggle to share.

## **Asset Diversification**

A fourth driver is the growing appetite among high-net-worth families to diversify their asset holdings geographically. Clients who are questioning whether they wish to hold all of their wealth—real estate, equities, liquid assets—within the United States are finding that investment migration programs offer a structured and compliance-friendly mechanism for deploying capital internationally. A qualifying investment in New Zealand or Portugal is not merely an immigration strategy; it is also a portfolio allocation decision.

**“Moving \$3 million to New Zealand is the path to permanent residency. It’s also part of a diversification of assets strategy—and it can fit naturally into a conversation a wealth manager or family office is already having with a client.”**

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## **Residence and Citizenship: A Crucial Distinction**

One of the most important contributions an investment migration advisor can make is helping clients understand the difference between residence and citizenship—two distinct legal statuses that are frequently conflated, and that have materially different implications for mobility, rights, costs, and long-term planning.

### **Residence by Investment**

A residence permit grants the holder the legal right to live in a given country for a specified period, subject to renewal conditions and, in most cases, the maintenance of the qualifying investment. It does not, in itself, confer citizenship or a passport. It is a permission—revocable, renewable, and tied to the specific country in which it is granted.

Residence programs vary significantly in their terms. In Italy and Portugal, a permit is granted for two years and renewed for three. The Greek Golden visa is renewed every five years. Each program has its own investment thresholds, age restrictions for dependents, and criteria for maintaining eligibility. If the qualifying investment is liquidated—the real estate sold, or the business stake redeemed—the right to renewal typically lapses.

For citizens of countries that lack access to the Schengen area, residence in a European country can unlock significant travel benefits. For Americans, whose passport already affords broad access to Europe for short visits, the primary value of European residence lies in the right to remain—not in the right to enter.

## **Citizenship by Investment**

Citizenship is a fundamentally different proposition. It is a lifelong right, difficult to revoke, and it comes with a passport—granting not merely the ability to live in one country, but access to a wide range of countries depending on the strength of that nation’s travel relationships. In the European Union, the significance of citizenship is amplified considerably: citizenship of any EU member state carries with it the right to live, work, and study in all 27 member countries.

For families thinking about future generations, this distinction is particularly powerful. An EU passport obtained through investment today can, in principle, be passed to children and grandchildren—giving them the right to build careers, pursue education, and establish lives anywhere within the Union, regardless of how the geopolitical landscape evolves.

**“Citizenship is a lifelong right. It’s very difficult to take away. And in Europe, if you become a citizen of one EU country, you gain the right to live and work in any of the 27 member states.”**

The trade-off is cost and, in many cases, time. Citizenship through investment in Europe typically requires a longer journey than residence alone. Portugal, currently one of the more accessible routes, requires 14 days of physical presence every two years and allows applicants to apply for citizenship after five years as a resident. Italy requires six months of residency per year for ten years. The path to a passport through investment is not a rapid one—with the notable exception of Caribbean nations, where citizenship can be obtained more quickly and at lower cost, though with correspondingly different benefits.

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## **Popular Programs for American Clients**

While the landscape of investment migration programs is broad—Henley and Partners promotes approximately 40 of the 60 actively operating programs globally—American clients tend to concentrate their interest across four categories.

### **Caribbean Citizenship**

Caribbean citizenship programs offer the most accessible route to a second passport in terms of both cost and timeline. Nations including St. Kitts and Nevis, Antigua and Barbuda, and others

offer citizenship in exchange for either a non-refundable contribution of approximately \$250,000 per family, or an investment in approved real estate at a somewhat higher threshold. The real estate option carries the added advantage of recoverability: St. Kitts allows the investment property to be sold after seven years, Antigua after five, enabling families to recoup much of their outlay.

Caribbean passports provide meaningful mobility, including visa-free or visa-on-arrival access to Europe, the United Kingdom, and Ireland. Notably, visa free access can change. They also offer a genuine physical destination: in the event of significant disruption in the United States, a family with Caribbean citizenship has a place to go—a villa, a rental property, a bolt-hole in a stable jurisdiction.

The multigenerational dimension of these programs is particularly striking. Families have structured purchases of resort villas cooperatively—grandparents, adult children, and their spouses each acquiring a share—securing citizenship for the entire extended family while also generating rental income or preserving a shared family property.

### **European Residence Programs**

Greece, Italy, Malta, and Portugal all operate active residence-by-investment programs, and each attracts different client profiles depending on investment structure, lifestyle preferences, and long-term objectives.

Portugal's Golden Visa program has achieved particular prominence, largely because of its relatively accessible path to eventual citizenship. The program currently requires only 14 days of physical presence every two years—a low threshold that suits families with no intention of relocating. Portugal's citizenship laws currently allow one to apply for citizenship 5 years after being a legal resident. However, that is expected to change to 10 years in the near future. Alternatively, most other EU countries require one to live in the country for at least 6 months a year for 7-10 years before being eligible to apply for citizenship. The prospect of EU citizenship, with its accompanying freedom of movement across 27 countries can be particularly appealing to applicants.

Notably, Portugal's qualifying investment categories have evolved. Direct real estate investment is no longer eligible; approved routes now include venture capital funds and other regulated investment vehicles, with a minimum of €500,000.

Greece offers a comparatively simple program with a real estate investment threshold starting at €250,000, and a five-year renewable residence permit. Italy's investor visa requires either a €250,000 investment in an innovative company or €500,000 in an Italian equity. Malta's direct citizenship program was recently closed following EU legal action; but there remains a route to Maltese citizenship through a merit based pathway.

## **New Zealand**

New Zealand has emerged as a residency program of notable and growing interest, particularly among American clients who are seeking both optionality and genuine lifestyle appeal. Unlike Caribbean citizenship, which serves primarily as a mobility option, New Zealand is seen as a country where families could genuinely wish to live—English-speaking, politically stable, with high-quality education and healthcare, and geographically distant from the pressures of the Northern Hemisphere.

The program is structured around two investment tiers. An investment of NZ\$5 million (approximately US\$3 million) places capital into approved categories including private equity, venture capital, and private credit. An investment of NZ\$10 million (approximately US\$6 million) accesses more conservative categories, including government bonds, listed equities, and certain charitable vehicles. For those pursuing the visa through the lower investment amount, the main applicant must spend 21 days in New Zealand over the three-year investment period; other family members need only enter once in the first year to activate their visa. Children under 25 who are single and not employed full time may be included on the parent's application.

After three years, the investment may be liquidated (subject to the terms of the chosen vehicle), and the family becomes eligible for permanent residency—a status that requires no further physical presence to maintain. Many clients pursue New Zealand in parallel with a European residence program or a Caribbean citizenship, treating the two as complementary layers of a broader optionality strategy.

## **Costa Rica and Talent-Based Programs**

For clients seeking a lower-cost plan B, Costa Rica offers a residence program accessible either through a real estate investment of US\$150,000 or by demonstrating passive income of US\$2,500 per month—a threshold that most high-net-worth individuals can satisfy through interest, dividends, or rental income alone. Costa Rica is notably welcoming to the LGBTQ+ community, making it a particularly relevant option for clients with heightened concerns about their personal safety or legal protections in the United States.

A separate and often overlooked category is talent-based or merit visa programs. Australia, for example, does not require any financial investment from applicants who can demonstrate exceptional ability in a field the country is actively seeking to attract. Successful applicants have included figures from the entertainment industry, private equity professionals with specialist expertise in fields such as biomedical research, and others whose skills align with national economic priorities. Portugal also operates a talent visa, and further merit-based programs are expected to emerge in the coming years.

## **Structuring the Investment: Legal, Tax, and Ownership Considerations**

For ultra-high-net-worth families, whose wealth is characteristically held across a range of vehicles—personal accounts, trusts, holding companies, family offices—the question of how to structure an investment migration application is rarely straightforward.

Each program has its own requirements governing the source and structure of qualifying funds. Portugal, for example, requires that the investment flow from a personal bank account opened in the client's name; company accounts are not eligible. In contrast, New Zealand permits investment from a trust, provided there are not third party trustees. Some programs accept investment from corporate structures; others do not. The answer is always program-specific, and advisors must engage with each client's existing arrangements carefully before identifying which routes are available.

### **Taxation: Separating Fact from Misconception**

Taxation is among the most frequently misunderstood aspects of investment migration, and three misconceptions in particular tend to surface in client conversations.

The first is that obtaining residence or citizenship in another country automatically creates a tax obligation in that country. It does not. Tax residency is a separate legal status, typically triggered by spending 183 or more days in a country within a given period, although there are some exceptions.

The second misconception is that becoming a tax resident in another country leads to double taxation. In practice, the existence of bilateral tax treaties, tax credits, and the tax-friendly policies that many countries use to attract wealthy residents means that double taxation is rarely the outcome. Nonetheless, the tax implications of any program must be assessed carefully, and Henley and Partners engages local tax professionals in each jurisdiction as a standard part of the advisory process.

**"We will bring the resources to bear to make sure clients are educated and are choosing programs that are not going to have negative tax consequences that they don't understand or expect."**

## **Family Dynamics and the Next Generation**

Investment migration decisions are rarely made by individuals in isolation. They involve families—often across multiple generations, with different risk tolerances, different lived experiences, and different levels of urgency about the need for optionality.

A recurring challenge is the generational gap in perception. Parents who have lived through historical disruption—or whose own families were shaped by it—often feel the instinct for a backup plan viscerally. Their children, who have grown up in a period of relative stability, may struggle to understand why such measures are necessary. The advisor’s role, in these situations, is partly educational: helping younger family members understand the value of optionality not as a counsel of despair but as a form of responsible planning.

The practical dimensions of family applications are also significant. Some programs allow minor children to be included in a parent’s application at little or no additional cost; others require separate applications once children reach adulthood. In Italy, dependent children may be included up to age 18; in Greece, to age 21. The cost and complexity of covering an entire extended family—across multiple generations, with children at different ages and stages—must be factored into program selection from the outset.

For families who wish to invest collectively—as in the cooperative villa purchase model common in the Caribbean—the structure of the investment itself may be designed to serve both the immigration and the estate planning objectives of the family simultaneously, generating income, preserving a shared asset, and securing citizenship across generations in a single transaction.

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## Common Misconceptions and How to Address Them

Experience in the field has distilled a set of misconceptions that advisors consistently encounter when first introducing the concept of investment migration to clients. Three are especially prevalent:

- **You must renounce your US citizenship** — This is false. The United States imposes no such requirement, and clients may hold multiple citizenships and residence permits simultaneously.
- **You must relocate** — Most programs require little or no physical presence to maintain. The right to live somewhere often does not obligate one to do so.
- **You will automatically face new tax burdens** — Obtaining alternative residence or citizenship does not create tax residency. That status typically requires spending 183 or more days in a country, and even then, treaty protections and local tax incentives frequently prevent double taxation.

Advisors in this space emphasize that the investment required to gain clarity on these questions is modest. Initial consultations carry no fee, and the value of understanding one’s options—before a crisis makes the decision urgent—is considerable.

**“Education is power. People right now want to know what their options are, and the best way to do that is to talk to someone who knows.”**

## The Role of the Trusted Advisor

Investment migration is an advisory domain with meaningful intersections across the wealth management ecosystem. Family offices, wealth managers, estate planning attorneys, and membership organizations serving high-net-worth individuals are all likely to encounter clients for whom these questions are live and pressing—yet few of these intermediaries have the specialist expertise to address them directly.

The practical consequence is that the investment migration specialist functions less as a standalone practitioner and more as an extension of the client's existing advisory team. A client's questions about alternative residence may surface in the same conversation as questions about opening accounts in Switzerland, structuring a trust for international investment, or protecting assets from domestic legal risk. The migration specialist's role is to navigate the specific program landscape, while coordinating with lawyers, tax advisers, and family office professionals to ensure that the broader implications of any decision are fully understood.

For the ultra-high-net-worth family, whose planning horizon extends across generations and whose concerns span multiple jurisdictions, investment migration is not a niche product. It is an increasingly standard component of comprehensive family wealth planning—one that belongs in the conversation alongside estate planning, asset allocation, and succession strategy.

## Conclusion

The rise of investment migration as a mainstream consideration for wealthy American families reflects something deeper than political anxiety or pandemic-induced caution. It reflects a maturing understanding of risk—the recognition that optionality is itself a form of wealth, and that the absence of alternatives is a vulnerability that no level of domestic prosperity can fully offset.

For families engaged in long-term wealth planning, the question is not whether to explore these options but when and how. The programs available today span a wide range of investment levels, jurisdictions, timelines, and benefits—from Caribbean citizenship obtainable within months to EU citizenship through merit based pathways that can take 2–3 years. Each carries distinct implications for mobility, taxation, estate planning, and family governance.

What unites them is the value they offer: the ability to sleep a little easier at night, knowing that if the world changes in ways that are difficult to predict, there is somewhere else to go—and the legal right to be there.

**“The more complex your clients are, and the more wealthy they are, the more complexity their options could have—and the more important it becomes to understand those options before you need them.”**

*Based on The UHNW Institute Podcast: “[Investment Migration](#)” featuring Judi Galst, Managing Director of Private Clients at Henley and Partners, in conversation with host Russ Haworth.*

### **About the Author**

Judi Galst is the Managing Director Private Clients at Henley & Partners, the global leader in residence and citizenship by investment. She has been recognized as the top advisor for the firm globally. Judi is a member of The UHNW Institute.

In her role, Judi specializes in developing and managing relationships with trust and estate attorneys, wealth managers, family offices, and other professional intermediaries who advise high-net-worth and ultra-high-net-worth individuals and families. Acting as an extension of their advisory teams, she helps them guide clients on how alternative residence and citizenship solutions can mitigate risk, unlock opportunities, and preserve wealth and legacy in a time of global uncertainty.

Judi also works directly with private clients, conducting in-depth assessments of their objectives and tailoring strategies that align with their personal and family goals, including recommending the most suitable citizenship-by-descent, residence, or citizenship-by-investment options.

A cum laude graduate of the University of Pennsylvania, Judi is personally pursuing German citizenship by descent for herself and her children, reflecting her passion for the transformational value of global mobility and planning.