



COMPARISON OF FOUR BILLIONAIRE INCOME TAX PROPOSALS (Short Form)

FEATURE	PRESIDENT BIDEN	REPS. COHEN & BEYER	SEN. WYDEN	REP. BOWMAN
Proposal name	Billionaire Minimum Income Tax	Billionaire Minimum Income Tax Act, H.R. 8558	Billionaires Income Tax	Babies Over Billionaires Act, H.R. 7502
Who pays the tax?	Only people worth at least \$100 million—the richest 0.01% (about 20,000 households)	Only people worth at least \$100 million—the richest 0.01% (about 20,000 households)	About 700 billionaires	Only people worth at least \$100 million—the richest 0.01% (about 20,000 households)
How much money is raised (over 10 years)?	\$360 Billion (Revenue score is likely much higher under the same methodology used to calculate Wyden tax estimate.)	\$360 Billion (Revenue score is likely much higher under the same methodology used to calculate Wyden tax estimate.)	\$550 Billion	TBD; likely more than the Wyden plan
What share of the money comes from billionaires?	Over half	Over half	100%	A “disproportionate” amount
What tax rate is charged?	Initially, enough to raise the overall tax rate of covered households to 20%. Upon sale of assets or death, a taxpayer will pay full taxes and tax rates owed in effect at that time.	Initially, enough to raise the overall tax rate of covered households to 20%. Upon transfer of assets, a taxpayer will pay full taxes and tax rates owed in effect at that time.	23.8%	23.8%
How does it treat tradable assets such as corporate stocks?	Growth in the value of tradable assets like stocks are assessed each year to determine if the taxpayer's overall effective tax rate is at least 20%.	Growth in the value of tradable assets like stocks are assessed each year to determine if the taxpayer's overall effective tax rate is at least 20%.	Growth in the value of tradable assets like stocks are taxed each year. Tax would also be due in the first year on the accumulated investment gains that predate enactment of the tax.	30% of the growth in the value of tradable assets like stocks are taxed each year.

FEATURE	PRESIDENT BIDEN	REPS. COHEN & BEYER	SEN. WYDEN	REP. BOWMAN
How does it treat hard-to-price assets like private businesses and fine art?	Increases in the value of hard-to-price assets will be estimated each year. Taxpayers may be able to challenge those estimated values with appraisals.	Increases in the value of hard-to-price assets will be estimated each year. Taxpayers may be able to challenge those estimated values with appraisals.	Tax on hard-to-price assets won't be due until the asset is sold and any increase in value determined. But taxpayers will owe interest on any missed annual tax payments.	Increases in the value of hard-to-price assets will be estimated each year; 50% of those gains will be taxed every five years.
What if someone's wealth is tied up—such as in a business—and they don't have the cash to pay the tax?	If someone has less than a fifth (20%) of their wealth invested in assets that are easy to convert to cash—like stocks and bonds—they are allowed to pay annual taxes only on their tradable assets. Tax on hard-to-price assets won't be due until the asset is sold or transferred and any increase in value determined. But taxpayers will owe interest on any missed annual tax payments.	If someone has less than a fifth (20%) of their wealth invested in assets that are easy to convert to cash—like stocks and bonds—they are allowed to pay annual taxes only on their tradable assets. Assets not taxed annually would be placed in Unliquidated Tax Reserve Accounts (ULTRA). Tax would then be due on any distributions from these accounts, including income like stock dividends.	No special provisions for so-called "illiquid" taxpayers.	No special provisions for so-called "illiquid" taxpayers.
Can the tax payments be made over time?	Taxpayers will have 9 years to pay any tax due on gains they made before the new tax came into effect. Then they'll have 5 years to pay taxes on any future gains. Illiquid taxpayers can take longer to pay but will incur interest charges.	Taxpayers will have 9 years to pay any tax due on gains they made before the new tax came into effect. Then they'll have 5 years to pay taxes on any future gains. Illiquid taxpayers can take longer to pay subject to rules to equalize the benefits of deferral.	Taxpayers will have 5 years to pay any tax due on gains they made before the new tax came into effect. They'll have to pay taxes on any future gains every year.	Taxpayers can choose to pay the tax assessed every five years on non-tradable assets in five equal annual installments, but they would be assessed a "deferral charge" for the privilege.
Sources ATF #Tax Billionaires Website	White House Fact Sheet U.S. Treasury General Explanations of 2023 Revenue Proposals (p. 34)	Bill Summary Section-by-Section Analysis HR 8558 Bill Text U.S. Treasury General Explanations of 2023 Revenue Proposals (p. 34)	Bill Summary Section-by-Section Analysis Draft Legislative Text JCT Revenue Estimate	Bill Summary Section-by-Section Analysis H.R. 7502 Bill Text

A more detailed version of this side-by-side comparison is [available here](#).