Special Issue on Jane Guyer's *Marginal Gains: Monetary Transactions in Atlantic Africa*

Incalculable Payments: Money, Scale, and the South African Offshore Grey Money Amnesty

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Abstract: This article seeks to refine conceptually the social study of finance and thus to extend the argument of Jane Guyer's *Marginal Gains* (2004). Using the case of the South African "grey money" amnesty, this article argues that social studies of finance have failed to pay adequate attention to social payments, as opposed to market exchanges, in their pronouncements about the extension of the calculative rationality and universal commensuration that are supposedly intrinsic to modern money. The amnesty, which allowed forgiveness for offshore tax evasion in return for a one-time payment, reconfigured "tax minimizers" as law-abiding and rational economic actors hedging against risk. Most took the opportunity; they were granted amnesty to repatriate their funds, which generated a significant boost in revenue for the South African state, with social and symbolic implications. This article reflects on what purchase is gained on the amnesty and the social study of finance generally by considering the amnesty as a series of payments, rather than cross-boundary financial transactions between individuals, trusts, and states.

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Jane Guyer's *Marginal Gains* (2004) interrupts a conversation going on in the social and cultural study of finance, as well as at large in popular understandings of the world economy. In broad brushstrokes, the argument that Guyer helps displace runs thus: In the beginning, factory labor was brought into the capitalist equation of time and money through the technique of the wage. The wage was the outcome of a calculus of reproduction as much as production and an increasing incursion into ever smaller spheres of the private, to guarantee the reproducibility of workers. Then, serially and over time, all human and nonhuman activity, in all its diversity—an infinite set—was brought under the wage/reproduction calculus. From labor the process extended further as all things, in their incommensurable distinctiveness, were rendered pieces of a giant formula for extracting ever-increasing profit via the commensurative capacities of the monetary abstraction.

The argument that calculative rationality is encroaching on all other values has been common in a number of academic, activist, and critical quarters for at least a century. It has affinities with Marx, Weber, and Simmel's very different assessments of the role of money, numbers, and rationality in the making of modern capitalism. Central to each is the pivotal role of exchange in the market. The idea that calculation gradually subsumes all other means of evaluation seems self-evident in markets where goods are equated with one another through one scale of value based on money, and where labor relations require the exchange of the worker's time for the wage. As everything enters the marketplace, everything is brought under the same monetary calculus. The argument also finds its way into the analysis of signification and meaning-making under capitalism. Money has historically been seen as the material instantiation of a theory of the sign. Since money both signifies and embodies value, theorists have seen it as exemplary of the process of signification itself, since signification is supposed to weld together words to the world, thought to matter, and abstraction to materiality. Hence the historical fascination with monetary objects like paper currency that have no intrinsic value (Shell 1982, 1995).

As I have discussed elsewhere, the fascination with whether there is something "real" backing money's value draws attention to its semiotic, but not performative or indexical, aspects. I have argued that we should focus less on what money means, and more on what it does (Maurer 2005a, 2006; see also Keane 2003; Hart 2006). Commensuration, after all, is a social process (Espeland & Stevens 1998); attention to its relationship to signification has been useful but at the same time limiting, as it deflects attention from money's pragmatics.

The present article has a related aim, and that is to demonstrate that the argument about the infinite extension of calculative rationality, particularly in discussions about finance, is not true to a huge amount of what counts as "finance" today. At the same time that scholar and layperson alike marvel at the complex mathematical abstractions of derivatives, hedge funds, and the attempt to quantify and model risk (LiPuma & Lee 2004), and view in those abstractions the latest incarnation of the calculative rationality that began with abstract labor presumed by the wage calculus (Postone 1993), a vast number of things financial—and enormous sums of money—involve no exchange and no commensuration at all. As such, they stand aside from the quantitative machinery that many have taken to be capitalism's hallmark. Rather, they involve payments, efforts to avoid payments, the consequences of those efforts, and the creation and manipulation of debt.

This article seeks to refine conceptually the social study of finance by drawing attention to payment as opposed to exchange. It does so through an analysis of the Grey Money Amnesty offered by the South African Revenue Service from 2003 to 2004 and a subsequent relaxation of restrictions on the foreign investments of South African citizens.[1] The Grey Money Amnesty co-occurred with a sharp rise in global governance and nongovernmental activity around offshore finance, the network of tax havens and financial services through which corporations and wealthy individuals avoid paying taxes by placing their money in a jurisdiction with lower tax rates than those of their country of origin. The discourse of offshore finance has undergone a series of significant shifts since the late 1990s in response to a global crackdown against so-called tax competition among states attempting to attract foreign investment. For tax havens, those investments are not, strictly speaking, capital investments; they do not do any "work" in their new home, nor are they invested in productive enterprises, onshore or off. At times, such investments are placed offshore to circumvent Controlled Foreign Corporation (CFC) rules or to achieve substantiation requirements that require investment in "real" enterprise.[2] Offshore investments can be part of complex portfolios of onshore and offshore products to manage and diversify risk, as well as to avoid or minimize tax liabilities. Tax competition has become an important issue for Oxfam and other nongovernmental organizations and activists in Africa because it is deemed an important contributor to the crisis of the African state: when wealthy Africans or corrupt African leaders expatriate their funds (or steal and expatriate government funds), these funds are lost to state coffers and national economies (Oxfam 2000; Christensen 2005; Mohamed & Finnoff 2005).

Although some African states market themselves as offshore spaces for financial services (Cameroon, for example, in addition to the more familiar anomalous jurisdictions that often become a seat for offshore finance like Djibouti), the main focus of Oxfam's concern has been the Caribbean, European, and Pacific tax havens used by wealthy Africans to hide their money. Oxfam and other multilateral agencies like the Financial Action Task Force (FATF) and the Financial Stability Forum (FSF) have also drawn attention to efforts of politically connected or politically controversial lead-

ers, their kin, and their associates to avoid public scrutiny—or, in the event of alleged or actual wrongdoing, to avoid asset seizure.[3]

There is a certain banality to offshore finance. The profile of the person or entity seeking to incorporate offshore has remained remarkably stable for the past fifty or so years: the wealthy individual seeking to hide his assets from a spouse; mainstream U.S. corporations seeking to circumvent trade restrictions, treaties, or embargoes or to hide their activities from competitors; insurance companies seeking reinsurance in the event of catastrophes like hurricanes; money launderers, terrorist financiers, drug traffickers, and tax evaders; very rich people seeking "tax minimization," especially in regard to intergenerational transfers of wealth; current or former government officials hiding moneys acquired through misappropriation, fraud, or kickbacks. The uses of the offshore are not entirely or always nefarious, however. Countries that tax on the basis of residency, not citizenship, produce workers who can earn tax-free income when they work abroad. Pension funds and university endowments have made use of offshore arrangements to manage risk and minimize exposure to onshore tax liabilities. The list also includes South African whites who hid their money offshore in advance of the end of apartheid.

Recommendations issued in the late 1990s and early 2000s by the Organization for Economic Cooperation and Development (OECD) and FATF have placed a high degree of scrutiny on what have been termed Politically Exposed Persons (PEPs), generally taken to mean former government officials and others with access to state revenue who, before leaving office, squirrel away money offshore.[4] Nigeria's former president, Sani Abacha, is a prime example. I am interested here, however, in people and entities not defined as PEPs and therefore outside this arena of information exchange and interdiction. Rather than receiving scrutiny, South Africans who hid money abroad during apartheid have received amnesty. They were given the opportunity to become reconfigured as law-abiding and rational economic actors hedging against risk. Most took the opportunity, and were granted amnesty to repatriate their funds. This generated a significant boost in revenue for the South African state. This article reflects on what purchase is gained on the Grey Money Amnesty and the social study of finance generally by considering the amnesty as a series of payments, rather than cross-boundary financial transactions between individuals, trusts, and states.

Payments Are Not Exchanges

Means of exchange, measure of wealth, store of value, unit of account, method of payment: anthropologists, sociologists, historians, and economists have argued over money's basic functions, carrying forward a debate that is at least as old as the invention of coinage. Most of the functions are subordinate to exchange, however, encouraging the tendency to conflate monetary relationships with exchange relationships. Wealth, value, and account are all central conceptual buttresses to the act and concept of equating goods according to a scale of value for the purposes of commensuration and subsequent trade. Payments, however, are different, and it is important to insist upon this difference, for if we do not, we run the risk of missing the myriad ways in which exchanges are shot through with other, nonexchange relationships. We also run the risk of taking pronouncements about the market's efficiency and smoothness at face value. My position on the assumption of market efficiency is not that it is morally repugnant—for I would like to withhold the reflex of repudiation that afflicts social critique where money and capitalism are concerned—so much as that it misses all the interesting things that are going on in any relationship involving money. Guyer (1995, 2004) has long drawn our attention to the role of social payments in monetary definitions and relationships. As she reminds us, contemporary transactions of all sorts are full of such payments, from fees, fines, and levies to bribes, tips, and bonuses (see also Zelizer 1996).

If price can seem rational because pegged to a system of exchange purportedly based on market efficiencies and the supply-demand curve, payments often seem irrational, inefficient, personal, primitive, or parochial. Yet, as Guyer and others have shown, such payments are integral to contemporary economies. They do not come under the logic of market equivalence, which is why they often seem so arbitrary (as price does not, at least for true believers, or those in the thick of the act of purchase). To put this in a more familiar perspective: paying two dollars for a cappuccino feels natural; paying five dollars for a cappuccino feels excessive; but if five dollars is the quoted price, and one needs the jolt, one will grudgingly pay. But paying two dollars for a cappuccino and then being charged an additional three dollars tax would feel scandalous. Paying two dollars and then being told one has also to pay an additional three as a "cup fee" would feel ludicrous; and paying an additional three dollars to drink your coffee without being targeted by thieves in the employ of your barista would constitute extortion. Yet this kind of situation is all too frequent in the "market" transactions in which people around the world are engaged on a day-to-day basis.[5] Social scientists and historians are accustomed to analyzing such payments in terms of patron-client relationships, and to seeing them only in places on the fringes of the world economy. It is a mistake, however, to think that just because the machinations of hedge funds or derivatives seem to move in accord with the mathematics of high-energy physics, that they are thus somehow exempt from those all-too-social systems of payment (as fascinating new work in the anthropology of finance is demonstrating; see, e.g., Ho 2005; Zaloom 2003; Miyazaki 2003, 2005; Riles 2004).

The literature on offshore finance has been slow to acknowledge the conceptual importance of payments, having been more focused on ques-

tions of spatiality, sovereignty, and inequality within tax havens, as well as the impact of offshore finance internationally (for a review of the literature, see Maurer 2005b, 2006; Palan 2003; Rawlings 2005). Offshore finance, after all, is often merely about moving money, and not necessarily "exchanging" it for anything. While there is a market in offshore financial services, much of what takes place offshore does not involve market transactions but rather parking or positioning funds in a particular jurisdiction so as to avoid making payments to another jurisdiction. One pays a fee to incorporate offshore so that one no longer has to pay taxes on a regular basis onshore. There are thus temporal and spatial dimensions to payment and the avoidance of payment in offshore finance. But they have little to do with the spatiotemporal coordinates of market exchange and commensuration.

In addition, offshore finance often involves the assets of so-called high-net-worth individuals (HNWIs or HINWIs) and ultra-high-net-worth individuals (UHNWIs). Merrill Lynch/Capgemini defines the former as those individuals whose assets exceed one million dollars and the latter as those whose assets exceed US$30 million (Capgemini 2006). For HNWIs and UHNWIs, payments often matter much, much more than purchases. For example, intergenerational transfers of wealth on the part of HNWIs and UHNWIs involve vast sums paid to kin as well as to governments (efforts to minimize or altogether eliminate inheritance taxes notwithstanding). And the ultra-rich are affected by limits on convertibility and mobility in ways most of the people on the planet never have to contemplate. Again, for a mundane example, consider the box on the U.S. Customs Form that has to be checked if one is entering the country bearing currency instruments of US$10,000 or more, or the U.S. bank reporting regulations that are triggered by deposits or withdrawals of more than US$5,000 if the bank deems the transaction to be "not the sort of transaction in which the particular customer would normally be expected to engage" (12 USC 1818, 1819, section 353.3 [a] [4] [I]). It is likely that few of you, dear readers, have ever marked that box or triggered those regulations on a regular basis, except perhaps in the course of making very special transactions like the purchase of a house.

The Grey Money Amnesty

In 2003 the South African Revenue Service (SARS) initiated a six-month period of amnesty for those who had unauthorized or illegal deposits in offshore accounts. This amnesty program, later extended to a full year, had two components. One was an Exchange Control Amnesty for South Africans who held foreign assets denominated in foreign currencies in contravention of certain exchange control regulations. The other was a Tax Amnesty for foreign income of South African residents that was held offshore and not declared to SARS.

The Exchange Control Regulations of the South African Reserve Bank (SARB) applied to South African investors as well as travelers carrying or sending currency instruments abroad and outside of the Common Monetary Area (CMA) (South Africa, Lesotho, Swaziland, and Namibia) within which capital is allowed to move freely. Investors were permitted to invest no more than R750,000 in a foreign country. Travelers were permitted a "travel allowance" of R160,000 per adult. Any unused portion of the travel allowance was required to be returned to South Africa and converted into rands.

It is evident that the Exchange Control Regulations applied only to a very narrow segment of South Africa's population. Exchange controls are an important way for states to maintain sovereignty over their economies and monetary systems. What is interesting in the present case is how widely out of scale the regulations are in a country where the average income is R45,000 per annum (Lehohla 2002:33). In other words, the Exchange Control Regulations in actual practice apply only to comparatively wealthy South Africans.

Wealth in South Africa correlates strongly with race and color (see table 1), and the Grey Money Amnesty coded a system of rank and race, barely hidden in the program's very name. The amnesty created a new kind of money, "grey money." Not quite white and not quite black, the amnesty shadow funds offshore entered a zone of grey that could be whitened through disclosure according to the amnesty's terms. The color terms are telling; they also name a nominal scale, and a set of procedures for conversion from one kind to another. They set up another nominal scale, a kind of rank, for people as well, and effected a conversion from tax evader to "taxpayer," a national subject "coming clean" and participating again in the project of national (re)construction. While a PEP is always a PEP, according to the OECD and FATF, a tax evader, for the Amnesty Unit of SARS, becomes an "applicant for amnesty" and then, application successful, enters an unmarked category of tax-paying citizenship—even if a lot of money remains offshore.

In addition, the HNWI population of South Africa has witnessed exceptionally strong growth in the early years of the twenty-first century. The number of HNWIs grew by 22 percent in 2003–2004 alone (Capgemini 2005:7). In both 2003–2004 and 2004–2005 South Africa was among the top four countries with the highest annual growth in the number of HNWIs in the world (Capgemini 2005:4; 2006:4).[6] Figure 1 shows the growth of the HNWI population worldwide and in South Africa. Note the relative rate of increase in South Africa compared to the rest of the world, especially after 2001. In absolute terms, in 2003–2004 there were approximately 37,000 HNWI South Africans; in 2004–2005, there were approximately 43,000.[7] These figures are roughly equal to the number of Grey Money Amnesty applications received by SARS: 42,672 South Africans applied for amnesty, and only 20 applications were rejected. The applica-

Table 1: Median Household Income, by Racial/Ethnic Category, South Africa, 2000

Racial/Ethnic Category	Income
African	R26,000
Colored	R51,000
Indian	R85,000
White	R158,000

Source: Lehohla 2002:33

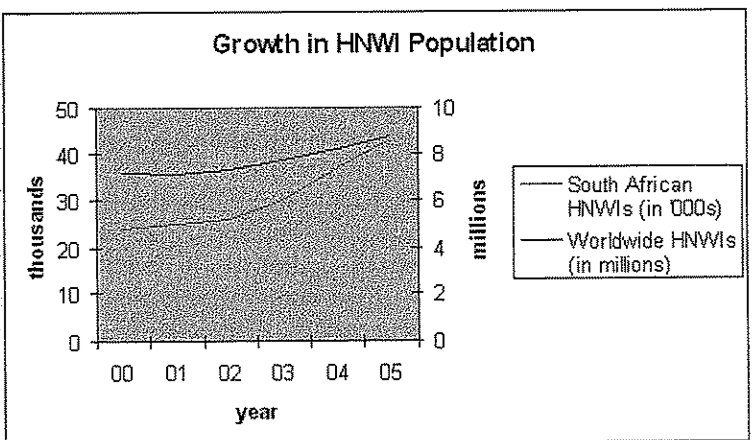
tions were for assets worth R68.6 billion, and they brought the South African government R2.9 billion in revenue (Cameron 2006).

The amnesty process also brought to light a number of remarkable instances of what Janet Roitman (2005) calls fiscal disobedience, as applicants submitted material demonstrating an array of manipulations of state and private funds offshore, such as depositing offshore unused amounts of travel allowances, sometimes left with relatives, sometimes deposited as "gifts" in trusts, and so forth, or creative uses of trusts.

The devil is in the details, of course. A series of nominal, ordinal, and interval scales of money and time figured in the amnesty process, and formed what Guyer would call points of tropological connection, or clots and hooks, with nominal scales or ranks of persons (Guyer 2004). The amnesty process involved a number of distinct timelines: first, the amnesty window itself, during which applications could be filed, from June 1 to November 30, 2003. Second, the extension of the amnesty window to February 29, 2004—made necessary because the amnesty regulations were not formally issued until September 30, four months into the amnesty window. Third, a series of dates created different classes of people eligible (or, more strongly put, required) to apply for amnesty: South African residents who earned money abroad and kept it offshore before July 1, 1997, and South African residents who inherited assets overseas before March 17, 1998, if such income was not initially reported to SARS or SARB (du Preez 2003). Finally, funds declared during the amnesty were deemed to have been held by their owner starting March 1, 2002, for the purposes of computing taxes owed.

The point about these dates and timelines is the manner in which they permit a rewriting of financial histories in order to "regularize" them, in SARB's terms. The timelines were also hooked to two nominal scale of money, one based on the thresholds mandated by the Exchange Control Regulations (exempting investments of less than R750,000 and exempting travelers' allowances of less than R160,000), and the other based on the distinction between grey and white money. The threshold nominal scale artic-

Figure 1. Growth in HNWI Population, 2000–2005.



Source: Capgemini World Wealth Reports, 2000–2005

ulated to the nominal scale of shades of grey money. Assets worth less than these categorical thresholds, which were arbitrary demarcations later amended after the amnesty expired, were offshore but not necessarily "grey" because they were within the limits set by SARB. Yet, since they were offshore, they were somewhat suspect—grey-*ish*, perhaps. The amnesty also specified at least four distinct kinds of money: cash, traveler's checks, interest from foreign banks and building societies, and money held in trusts. Each was treated differently. So much for the idea that money is freely and universally fungible!

The terms of the amnesty involved yet another temporal scale and mandated payments to SARS based on this timeline: the amnesty assessed 5 percent tax on amounts declared and repatriated within three months of an application's approval, and 10 percent on any amounts still offshore after those three months had passed. In other words, if one was willing to pay 10 percent on assets declared during the amnesty, one could technically retain them offshore. Though SARS was likely to continue to pursue repatriation of funds in excess of the Exchange Control Regulations threshold, it raised that threshold to R2 million in 2006 (Cameron 2006). It could be argued, then, that the amnesty was simply a one-time effort to exact payments to the state revenue service from South African HNWIs before relaxing restrictions against the movement of HNWI funds offshore. I will return to this point in the conclusion.

Documents pertaining to the amnesty are fraught with the ironies of the process, and also an unease about whether amnesty applicants were cul-

pable for criminal acts, and whether the amnesty process really would wipe clean those past transgressions. This anxiety turned a dispassionate discussion of "the dates on which amounts . . . derived [from income in South Africa and transferred overseas] were accumulated or converted to foreign assets," for example, into "VAT fraud."[8] The sketch of the different kinds of time, money, people, and places (South Africa, the Common Monetary Area, and "offshore") involved in the Grey Money Amnesty captures both the repertoire of clots, if you will, that conversions among scales effected, and also how these conversions reconfigured the illegal transfer of wealth abroad into a "plight" for the hapless amnesty applicant. For the amnesty process posed what the Revenue Service called "a dilemma": "How does a taxpayer comply with each new tax amendment without disclosing one or more previous exchange control or tax offence? People starting with a relatively minor exchange control offence have found themselves being drawn into increasingly serious tax offences. Their plight worsened with an increase in the penalties for non-disclosure."[9] Hence, amnesty, or amnesia, washing grey money clean. And it is truly amnesia, for it utterly reorganizes the time line of transactions by declaring by fiat that, as noted above, foreign assets will be deemed to have been held starting with March 1, 2002, even if they have been held for much, much longer.

It is amnesia in a more profound political sense, as well. The racial ranking of persons and wealth revealed in the Grey Money Amnesty makes evident that the amnesty was part of the active process of forgetting the legacies of apartheid: the Grey Money Amnesty's very name deracinated the racialized relationships of rank that lay just beneath the surface. What was the amnesty if not a transfer of wealth from a minority of rich whites to a postapartheid state deeply invested in reconciliation through social payments? The Grey Money Amnesty was thus a kind of "truth" making, reconciliation, and reparation. Reparations in themselves prove the more general point that payments can be much more important than market transactions, especially when the prototypical market transaction between white and black recalls the purchase of the latter by the former. Reparations must involve payment mechanisms, not market mechanisms, for the latter would come very close to sharing the formal qualities of slavery; and the payment, because not part of the market calculus, can never be adequate to the incalculable value of the violent dispossessions of colonialism.

A Gradient or a Tangle? Incalculable Payments

I have been arguing that the case of the Grey Money Amnesty is just one example of the importance of payments, not exchanges, in finance. Paying attention to payments entails a more cautious attitude toward the emphasis on calculation and commensuration in social studies of finance and markets. Callon and Muniesa (2005) put forward a theoretical framework for analyzing calculability in markets by insisting on attention to the processes whereby things are made calculable. This entails attention to rules and material devices that render things calculable, as well as an expansion of the concept of calculation to include qualitative judgment, a gradient, that is, from judgment to calculation. The expanded notion of calculation permits greater analytical attention to specific material devices: "An invoice, a grid, a factory, a trading screen, a trading room, a spreadsheet, a clearing-house, a computer memory, a shopping cart—all these spaces can be analysed as calculative spaces, but all will provide different forms of calculation" (Callon & Muniesa 2005:1231).

Although I am drawn to this dilation of the concept of calculation, I am concerned that the scheme is limited because it is formulated explicitly in reference to market transactions. It thus misses precisely the sorts of conversions and tropes among the nominal, interval, and ordinal scales the Grey Money Amnesty brought into play, and their relationship to global antitax competition efforts. These scales, conversions, and tropes can reorient critical scholarship on finance by complicating its account of calculation. The levies assessed during the amnesty were not about equivalence or commensuration in markets but about activities taking place to one side of market exchanges. They also raise the provocative question of whether, for HNWIs and UHNWIs—the people involved in a lot of finance, offshore or otherwise—markets simply may not matter as much as payment regimes. This is a question that cannot be answered here, but one that critical research on finance in general and offshore finance in particular must begin to address.

There is an important addendum to the story of the Grey Money Amnesty that places it in the same company of other efforts to rein in offshore finance. The OECD and FATF efforts to regulate offshore finance through a new information regime and due diligence requirements had no effect on the amount of money held offshore (Vlcek 2006). The Grey Money Amnesty may have served to place on record those who at one time and possibly now have assets offshore, and to garner R2.9 billion in revenue (Cameron 2006). But, after the amnesty, SARB increased the allowance for offshore holdings to R2 million. In other words, SARB authorized the expatriation of R2 million per adult, in effect promoting offshore finance and indirectly helping to propel the continued strength in the growth of South Africa's HNWI population. It also permitted amnesia regarding South Africa's racialized ranking of persons and their wealth by putting it in terms of exchange control regulations, while effecting a subtle attempt at reparation that was quickly obviated by the subsequent relaxation of exchange controls. The Grey Money Amnesty was a one-time deal for the wealthy, and in effect it generated a one-time payment to the people of South Africa.[10] In its wake, however, limits on offshore investment were relaxed even further, permitting wealthy South Africans again the freedom from obligations to the state in which they reside and a sequestering of their wealth

from the rest of the republic's racial hierarchy. The growth of South Africa's population of the very wealthy is thus propelled by a tangle of incalculable payments, and their avoidance, not by a series of exchanges in a "free" market.

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Notes

1. There have been several similar offshore tax amnesties in the past ten years with the intent of information disclosure to government revenue agencies and revenue capture, including those of Belgium, Germany, Ireland, and Italy and, in 2007, the United Kingdom. In 2003, ten U.S. states offered an offshore amnesty under the authority of the Internal Revenue Service.
2. CFC rules are an effort to ensure that income from a foreign-owned corporation is taxed in the parent country. They are an attempt to deal with the lack

of international tax regulation and the "ever-increasing number" of bilateral Double Taxation Agreements between pairs of countries which has created arbitrage opportunities to reduce tax liabilities, or, as one of Rawlings's informants put it, "opportunities for tax planning" (2007:57). I would like to thank Gregory Rawlings for his insight into such arrangements.

3. The Financial Stability Forum was convened in 1999 and brings together representatives from twenty-five major national financial authorities (central banks and supervisory agencies as well as treasury and finance department representatives) as well as international regulatory groups and central bank experts, and the European Central Bank. The Financial Action Task Force is a task force of the Group of 8 convened to create and promote policies to counter money laundering and terrorist financing.
4. On the OECD and FATF efforts against tax competition, see Sharman (2006), Sharman and Rawlings (2005), and Maurer (2005b).
5. Rawlings (2003:297, n.10) draws attention to the history of the conflation of "fair" price with "true" price through accounting mechanisms associated with the advent of the joint-stock corporation. Trades had to be deemed "fair," that is, not subject to force or fraud; and accounts-keeping facilitated the idea that numbers in ledgers reflected independent "truths." A fair trade thus took on the character of a true—that is, purely market-driven—trade. See also Poovey (1998).
6. The top gainers in 2003–2004 were, in order from the highest to lowest, Singapore, South Africa, Hong Kong, and Australia. The top four in 2004–2005 were South Korea, India, Russia, and South Africa.
7. Calculated by the author based on figures available in *Capgemini World Wealth Reports*, 2000–2006.
8. See Republic of South Africa, Amnesty Unit FAQs, Part 1, Q18, Q19; available at http://www.amnestyunit.gov.za/.
9. Amnesty Unit FAQ Part 1, Q1.
10. Most similar tax amnesties are one-time affairs promoted as "chances for people to come clean." My thanks to Gregory Rawlings for this observation.

Special Issue on Jane Guyer's *Marginal Gains: Monetary Transactions in Atlantic Africa*

Households and the Social Organization of Consumption in Southern Ghana

Christopher Udry and Hyungi Woo

Abstract: This article replicates Guyer's finding in *Marginal Gains* (2004) of a social gradient in expenditure patterns of Ghanaian households using more flexible statistical techniques than those used in the book. We show that similar gradients are found in Côte d'Ivoire and in Kagera, Tanzania, suggesting that Guyer's finding in Ghana is a manifestation of a more general phenomenon. In addition, we examine patterns of measurement error in household expenditure data from Ghana. This reveals a worrying possibility that survey reports of expenditure may reflect respondents' beliefs about what expenditures *should* be, as well as actual expenditures within the household.

Introduction

In the chapter of *Marginal Gains* titled "Balances: Household Budgets in a Ghanaian Study" (chapter 8), Jane Guyer rediscovers a remarkable fact, and draws from it important, wide-ranging, and surprising implications. The fact is this: in predominantly Akan areas of Ghana, households of a wide variety of types (headed by women and men, early and late in their life cycle, migrant and nonmigrant, even those consisting of only a single person) have astonishingly consistent patterns of expenditure. About 40 percent of all expenditures by households of all different types is spent on

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