

**SWISS ADDRESS HYPOTHETICALS**

The following hypotheticals illustrate how the CRT will apply the "reasoned and satisfactory" standard, as provided in Article 21(1). The examples are intended to be illustrative only. Each case would be decided on all of its particular facts and circumstances, including credibility determinations.

1. Claimant provides credible information that the account owner had a secondary residence in Switzerland. This would be a reasoned and satisfactory basis.
2. Claimant provides credible information that the account owner had a Child in a Swiss school. This would be a reasoned and satisfactory basis.
3. Claimant provides credible information that the account owner opened an Account in his or her own name, but using the Swiss address of a lawyer or intermediary. This could be a reasoned and satisfactory basis, depending on the specificity or credibility of the information concerning the intermediary.
4. Claimant provides credible information that a person with a Swiss address opened an Account in that person's name, but for the benefit of a Victim. This could be a reasoned and satisfactory basis, depending on the specificity and credibility of the information concerning the relationship between the person who opened the Account and the Victim. For example, if the claimant produces a letter dating from the relevant time period stating that the Victim used a specific lawyer or other Swiss person for opening an Account, this would be a reasoned and satisfactory basis. If the claimant states only that the Victim knew a lawyer in Switzerland or had family or friends in Switzerland, this would not be a reasoned and satisfactory basis.
5. Claimant states only that the account owner opened an Account in Switzerland using a pretextual Swiss address. Without more information, this is not a reasoned and satisfactory basis. However, if the claimant provides other corroborative information about why a pretextual Swiss address was used, this may become a reasoned and satisfactory basis.
6. Claimant states only that the Account Owner had an Account in Switzerland. This is not a reasoned and satisfactory basis.
7. Claimant states only that the account owner opened the Account while traveling in Switzerland. This is not a reasoned and satisfactory basis.