cial issues with foundations and trusts in Liechtenstein. Implementation is scheduled for January 2014.[58]

1.4 Role of Switzerland in the Development

1.4.1 Initial Situation

Switzerland is one of the most important financial centres for private investments. The core competence of the Swiss banking industry is asset management for individuals, especially offshore private banking, where assets are managed outside of the country of origin of the client.[59] Besides the solid political and economic conditions and the high quality of the banking services, Switzerland was known for its reluctance towards mutual administrative and legal assistance in tax matters and its banking secrecy.[60]

It is estimated that one third of all private assets invested abroad are managed in Switzerland, equivalent to about CHF 2.5 to 4 trillion.[61] Estimates on the portion of untaxed assets vary greatly. In 2001, relying on information from Geneva bankers, the French parliamentary delegation estimated in 2001 that 90% of offshore private assets in Switzerland are untaxed.[62] Konrad Hummler, partner of the private bank Wegelin, estimates that 30 to 80% of the assets are untaxed.[63] There are estimates that Italian citizens have around EUR 270 billion of untaxed assets in Switzerland. Giegold claims that around EUR 450 to 550 billion untaxed assets are invested in Switzerland, Liechtenstein and Luxembourg.[64] Moreover, a Swiss business journal attributes EUR 400 to 800 billion of untaxed assets to German individuals in Switzerland.[65]

---

[58] Abkommen zwischen dem Fürstentum Liechtenstein und der Republik Österreich über die Zusammenarbeit im Bereich Steuern, 2013.

[59] Missbach, 2009, p. 101-102.

[60] Vogel & Ashauer-Moll, 2010, p. 91.

[61] Thielemann, 2002, p. 113-132

[62] Assemblée Nationale, 2001, p. 32.

[63] Cash, 1.4.2004, p. 7

[64] Giegold, 2003, p. 33.

[65] Cash, 9.11.2006, p. 3.