

Who reports and on what grounds

*Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland), Solicitor (Hong Kong),
Solicitor (England & Wales)*

The banks account for the overwhelming majority of reports. In 2024 they filed 92.3 per cent (13,973 reports). They were followed by payment service providers with 2.2 per cent, credit card companies with 1.6 per cent, providers of services in virtual assets and fintech with 1.5 per cent and asset managers with 0.9 per cent.¹ In 2025 the banks' share was 91.3 per cent (19,246 reports).² Fiduciaries and lawyers acting as financial intermediaries appear only among the small categories. The national risk assessment of 2021 drew the conclusion that the low number of reports from fiduciaries and lawyers in proportion to their exposure indicated a significant gap, a point to which this chapter returns.³

As to legal basis, 72.5 per cent of the reports in 2024 were filed under the duty to report of Article 9(1)(a) AMLA. Another 21.7 per cent were filed under the right to report of Article 305ter(2) SCC and 5.6 per cent after the breaking off of negotiations under Article 9(1)(b) AMLA. In 2025 the shares were 76.6, 17.4 and 5.7 per cent.⁴ Fraud dominated among the suspected predicate offences, with 59.4 per cent of the reports in 2024 and 64.3 per cent in 2025. Reports with an indication of a criminal organization under Article 260ter SCC numbered 424 in 2024 (2.8 per cent) and 695 in 2025 (3.3 per cent). Of the latter, 32 had led to a forwarded case by the end of the year.⁵

1 The Ticino share: reporting intermediaries

The MROS no longer publishes the canton of the reporting intermediary. Earlier reports did, and they show the weight of Ticino. In 2010 intermediaries based in Ticino filed 237 of 1,159 reports, or 21 per cent, which placed the canton second behind Zurich (420 reports, 36 per cent) and ahead of Geneva. Over the decade from 2001 to 2010, Ticino reports had moved between 40 and 97 a year before the jump of 2010.⁶ The MROS explained the increase partly by the composition of the clientele, a large

part of which consisted of Italian citizens. When Italian criminal investigations were opened, the Italian press published the names and sometimes the addresses of suspects, which allowed Swiss intermediaries to compare them with their client data.⁷ The observation describes a mechanism that remains typical. Many Ticino reports are triggered by Italian press reports, Italian seizure orders or Italian requests for mutual assistance, so that the Swiss report follows the Italian investigation.

By 2018 the picture had changed in proportion. Ticino intermediaries filed 799 of 6,126 reports, or 13 per cent, and the canton ranked third behind Zurich (2,332 reports, 38 per cent) and Geneva (1,890 reports, 31 per cent).⁸ The decline in share reflects the growth of reporting in the big banks of Zurich and the private banks of Geneva after the large international corruption cases of the 2010s, and the contraction of the Ticino banking market described in Chapter E.I. In absolute numbers, however, Ticino reports had more than tripled between 2010 and 2018.

2 Notes

1. MROS, Jahresbericht 2024 (above), 17. ↩
2. MROS, Annual Report 2025 (above), 17–18. ↩
3. Interdepartmental Coordinating Group on Combating Money Laundering and the Financing of Terrorism (CGMF), Report on the national assessment of the risks of money laundering and terrorist financing in Switzerland, August 2021, <https://www.sif.admin.ch/dam/en/sd-web/zXS66fkBEPEO/zweiter-bericht-risiken-geldwaescherei-terrorismusfinanzierung-en.pdf>. ↩
4. MROS, Jahresbericht 2024 (above), 18; MROS, Annual Report 2025 (above), 19. ↩
5. MROS, Jahresbericht 2024 (above), 19 and 23; MROS, Annual Report 2025 (above), 20 and 24. ↩
6. MROS, Rapporto d'attività 2010 (above), 27. ↩
7. MROS, Rapporto d'attività 2010 (above), 29. ↩
8. MROS, Rapporto d'attività 2018 (above). ↩

For general information only. This article does not constitute legal or tax advice, does not replace advice on an individual case and creates no lawyer-client relationship. It reflects the legal position as of September 2026.

Online version: helveticaregister.com/lugano-who-reports-and-on-what-grounds