错误转账与欺诈转账：与瑞士的比较

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瑞士的民事救济较弱，刑事救济较强。根据《瑞士债务执行与破产法》第271条及以下各条进行的民事扣押（Arrest），要求资产位于瑞士境内。在瑞士法下，代币的所在地与*Cheong Jun Yoong*案之前在新加坡法下一样不确定。瑞士法院没有英国意义上的Mareva管辖权，也没有为支持民事请求而针对交易所发出披露令的既定实践。相比之下，瑞士检察官通常会在收到控告后数日内，根据《瑞士刑事诉讼法》（CrimPC，StPO）第263条扣押加密资产，瑞士交易所也会予以配合。对于涉及瑞士和新加坡因素的跨境欺诈，实践中的做法是在瑞士提出刑事控告，同时在新加坡提起民事诉讼。两者相互协调：瑞士的扣押保护在瑞士托管的资产，新加坡的命令则覆盖交易所和被告。第H部分第III、V和VI章阐述了瑞士方面的情况。

跨境视角

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