The cross-border estate

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

Jurisdiction and applicable law

A deceased domiciled in Switzerland is subject to Swiss succession law and Swiss jurisdiction for the whole estate, including assets abroad, under Arts 86 and 90 PILA, unless the deceased, being a foreign national, elected the law of a nationality by will.[1] Singapore applies the common-law rules: succession to movables is governed by the law of the deceased's domicile at death, succession to immovables by the lex situs, and digital assets are treated as movables.[2] A Swiss-domiciled deceased with tokens at a Singapore custodian therefore has an estate governed by Swiss law in both countries. The Singapore executor obtains a resealed or fresh grant on the strength of the Swiss certificate of inheritance. A Singapore-domiciled deceased with tokens at a Zug custodian has an estate governed by Singapore law. The Swiss custodian releases on the Singapore grant with an apostille and a Swiss legal opinion on the executor's authority.

The problem case is the deceased with ties to both. A founder who lived in Zug for three years and in Singapore for two, with a spouse in one and a company in the other, has a domicile that each jurisdiction may claim. Switzerland asks where the centre of life was. Singapore asks where the deceased intended to reside permanently. The answers can differ, with the result that both legal systems claim to

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

govern the whole movable estate and the forced-heirship rules of Switzerland collide with the testamentary freedom of Singapore. The plan should fix the domicile by fact and by document: a declaration of domicile in the will, consistent tax residence, a home in one place and a consistent account of intentions.

Assets on exchanges in both places

The hardest practical case is an estate with balances on exchanges in several jurisdictions. Each exchange applies its own terms of service. These typically provide that the account is personal and non-transferable, that the exchange will deal with a personal representative on production of specified documents and that the exchange may close the account and remit the balance in fiat. A Swiss executor dealing with a Singapore-licensed exchange will usually be asked for a Singapore grant, which requires a resealing or fresh application in the Family Justice Courts, with the Swiss certificate of inheritance and the will as evidence of entitlement. A Singapore executor dealing with a Swiss-based exchange will be asked for a certificate of inheritance or an executor's certificate from the Swiss authority at the deceased's last domicile. In the case of a Singapore domicile no such authority exists, so the executor relies on the Singapore grant with an apostille and the exchange's goodwill. The delays run to six to eighteen months in my experience. The planning answer, repeated because it is the single most useful piece of advice in this chapter, is to move balances off exchanges during life.

Example

A Swiss national, domiciled in Zug, dies leaving a spouse and two adult children. The estate includes CHF 3 million in securities at a Zürich bank and CHF 4 million in bitcoin held in a multisignature wallet with a Zug provider as co-signer. It also includes S$ 2 million in ether on a Singapore-licensed exchange and a 20 per cent token allocation in a protocol foundation, vesting over two more years and valued at CHF 6 million. The will appoints a Zürich lawyer as executor, elects no foreign law and allocates the bitcoin to the children as a legacy in kind valued at the date of death, with the residue to the spouse. The executor obtains the certificate from the

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

Zug authority, instructs the co-signer under the will's cooperation clause, moves the bitcoin to a custodian in the estate's name and distributes it to the children against receipts. For the Singapore exchange balance the executor applies for a grant in Singapore with the Swiss certificate and will, a process that takes seven months, after which the exchange remits the ether to a custodian wallet. The vesting allocation is the hardest. The foundation's vesting contract continues to release tokens to the deceased's address, so the executor must obtain the key to that address or persuade the foundation to redirect the vesting to an estate address. The foundation's board will do that only on the executor's certificate and a legal opinion on the heirs' entitlement. The compulsory portions are calculated on the value at death. Because bitcoin rose 30 per cent between death and distribution, the children have received more than the spouse in economic terms, which the will's valuation clause anticipated.

Notes

1. PILA, SR 291, Art. 86 (jurisdiction of the Swiss authorities at the last domicile), Art. 90 para. 1 (Swiss law applies to the estate of a person last domiciled in Switzerland) and Art. 90 para. 2 (a foreign national may elect the law of one of their nationalities). Part D, Chapter IX. ↩
2. Dicey, Morris & Collins, The Conflict of Laws, 16th ed., rule on succession to movables; applied in Singapore under the Application of English Law Act 1993. Part J, Chapter VIII. ↩

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

Author contact: Dr Alexander Ressos, TEP · contact@ressos.com

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.