



**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**IN RE
HOLOCAUST VICTIM ASSETS
LITIGATION**

Master Docket No. CV-96-4849

**DISTRIBUTION PROPOSAL OF
THE ASSOCIATION OF HOLOCAUST
SURVIVOR FROM THE FORMER SOVIET UNION**

I. Introduction and Summary

In response to the court's order from November 17th, 2003, The Association of Holocaust Survivors from the Former Soviet Union hereby submits a proposal for the distribution of funds. The Association of Holocaust Survivors from the Former Soviet Union is named as a Plaintiff and class representative in this litigation. We recently submitted a distribution plan to the Special Masters and participated in the court hearings regarding the distribution plan.

The Association of Holocaust Survivors from the Former Soviet Union espouses the recent decision made by the court to deem the near term allocation of some portion of the funds initially selected for the Deposited Assets Claims. In the distribution of these funds, The Association of Holocaust Survivors from the Former Soviet Union recommends that the court appropriate these funds for the following purposes. First, to develop a foundation on the decision that has been reached by the Second Circuit Court, in which, to allocate funds for *cy pres* distribution to needy class members, particularly from the areas of Eastern Europe. Second, as described below in Section III, the Association of Holocaust Survivors from the Former Soviet Union represents nearly

15,000 New York City wide members who rely on many of the free programs and events offered by the association. A vast amount of these programs need additional funding in order to continue to serve the needs of the community today and in the future. Third, as explained below in Section IV, the Association of Holocaust Survivors from the Former Soviet Union is in a unique position to enhance research and education on a frontier that has recently been made available since the fall of the former Soviet Union. Finally, listed below in Section V, the Association of Holocaust Survivors from the Former Soviet Union proposes a distribution methodology to implement its proposal.

II. The History & Framework of the Association

Auschwitz and Dachua are known world wide. Minsk ghetto and Babi Yar are known only to us. We witnessed our families and friends perish under the Nazi war machine. The first acts of the holocaust were committed after the Nazi's crossed the Soviet border. Our Association consists of those few survivors, who were fortunate enough to live through the horrors inflicted by the Nazis. The members of the Association remained oppressed under communism and were persecuted for decades behind the iron curtain, just for being Jewish. When they finally immigrated to the United States, they were feeble and broken. The members of the Association are between the ages of seventy and one-hundred and seven years old. The majority of the members live at or below the poverty line. They live off of government subsidies, which are not enough to pay the rent, medical bills and other basic necessities. "As living costs rise and government funding drops, anxiety is running high among Russian-speaking Nazi victims, many of whom are already struggling to find money for food and shelter"¹

¹ The struggle to help aging Nazi victims. (2004). Retrieved March 4, 2004. www.ujafedny.org

III. Programs and Events

Many of our elderly members live alone and have no social outlet other than the Association. The Association offers all of our survivor's methods of acclimating to their surroundings by:

- a. Providing English speaking classes twice a week.
- b. Assistance with governmental agencies.
- c. Preparation for the Citizenship test.

Additionally, the Association recognized the importance of helping our members celebrate the various Jewish traditions and holidays such as: Rosh Ha'shana, Chanuka, Tu B'shvat, Purim and Passover; all of which were prohibited to practice under the Nazi regime. In keeping with the spirit of camaraderie and family, every three months the Association celebrates the birthdays of its members. In observance with Jewish traditions, each birthday member is given thirty-six dollars, the numerical significance of wishing someone a long life twice. More over, the Association organizes concerts with traditional Jewish songs performed in Yiddish.

Close contact is maintained with other organization throughout the nation, as well as international organizations located in the Ukraine, Belarus, and Israel. Our Association is on the board of the World Confederation of Holocaust Survivor and Nazi Fighters organization, located in Tel Aviv, Israel. The Association hosts charity fundraisers and promotes rallies for peace and solidarity for victims of terror in America and Israel.

The Association conducts numerous holocaust memorial events for our members. We commemorate holocaust remembrance day (Yom Ha'Shoa), the mass executions at Minsk ghetto, Odessa ghetto and hundreds of Babi Yars throughout the former Soviet

Union. The Association has several conferences on the topics of Holocaust denial that include: Anti-Semitism, Neo-Fascisms and Islamic fundamentalism. Our members have witnessed first hand the various atrocities performed by the Nazis. The Association collects various paperwork, photographs, and testimony from our members to ensure that their stories and proof of what happened shall exist once they are gone.

Many members of the Association visit other members who are in the hospital and provide them with giving one hundred and fifty dollars to any member who has undergone surgery or has been severely ill for a long period of time. Members also conduct home visits and do the grocery shopping for those who are bed ridden. In the event of death, the Association contributes two hundred dollars to the burial costs of any member.

All these programs and events are created in conjunction with and are achieved through the support of organizations such as UJA-Federation, COJECO, Claims Conference, NAYNA, HIAS and other Jewish organizations.

IV. Research and Education

There exists a large discrimination policy when it comes to holocaust survivors from the former Soviet Union. The survivors from Poland and Germany were able to tell their story to the world after the war and decades to follow. Soviet holocaust survivors were not. Soviet Jews were condemned to silence or death. With the collapse of the Iron curtain and with the influx of Soviet Jewry, have the stories of the holocaust on the Soviet border emerged.

The Association of Holocaust Survivors from the Former Soviet Union between 1998 and 1999 was officially recognized by the United States Holocaust Museum in

Washington D.C. On April 18th, 1999 at the memorial hall in the Museum, the name of Transnistria was added, as one of the largest concentration camps from the Soviet Union. As of today, there has been no new material or information added to traditional holocaust education.

The Association believes it is our mission to create an exhibit of materials collected from the former Soviet Union and from our members. We would like to conduct research into uncovering further evidence, so that the extent of what happened on the former Soviet borders can one day be truly exposed. This exhibit will also contain materials that will provide an image of the vibrant Jewish communities prior the war, there ordeals during the war and post war Soviet oppression. The information and materials that would become available from this project will be unique in the sense that no other museum would have subject matter on this topic. The impact of all this collected material would be unprecedented, especially in America, where a large portion of the Jewish population can trace its roots back several generations to Russia.

The Association would like to organize trips with a diverse group of students, ranging from ages fourteen to twenty-one and bring them to the concentration camps of the former Soviet Union. These students will witness first hand the sites of the holocaust and will hear our members give an account of the history of what really happened. Our members are the last witnesses to the holocaust. We must ensure that their stories pass on to future generation, so that they may have the tools to confront holocaust deniers.

V. Distribution Methodology

All of the aforementioned programs and events are usually conducted in various synagogues, which charges us approximately two hundred dollars an hour. The

Association spends lots of valuable time and money finding suitable places to hold our meetings and programs. The grants that we receive from other organizations totaled twenty five thousand dollars a year, which is usually spent in the first half of our budget cycle. Currently, we do not have a fixed office location or phone. Board members of the Association use their own phones and whatever money they have to keep the Association a float. Our office budget is fifty seven dollars, which is not even enough to send all of our members monthly information packets.

We feel that it is imperative for our Association and for the sake of our members that we establish a proper facility to operate from. This headquarters' would become the primary meeting place for all of our members. It would also function as a community center, open to all. The facility would house the holocaust exhibit previously mentioned and would function as the central collection area for all the materials acquired from the former Soviet Union regions. The cost of building such a facility would require a start up cost of \$12 million.

We ask that an additional \$6 million be distributed for developing the holocaust exhibit previously mentioned. These funds would go for the research and procurement of materials from the former Soviet Union. They would also be used towards paying for flights to various former Soviet areas, hotel stay, security, and stipends for skilled researchers.

Furthermore, the Association requests that \$8 million be distributed to the following programs that aid members who are hospitalized, live in horrible conditions, and to help with funeral costs. A portion of this \$8 million go towards holocaust

memorial conferences, Anti-Semitism seminars, Fighting Holocaust denial conventions and attending International Holocaust symposiums.

VI. Conclusion

The Association of Holocaust Survivors from the Former Soviet Union is an organization with close community ties and is run by holocaust survivors for holocaust survivors. As such, we feel that this proposal of \$26 million, best reflects the needs of holocaust survivors from the former Soviet Union. As previously stated, our members were tortured under Hitler's Nazi rule and under Stalin's iron fist. They came to this country in worse condition than the holocaust survivors from Western Europe. Our members didn't have the chance to work or to get properly established. Now is the chance to make a positive difference in their lives.

Date: March 6th, 2004

Respectfully submitted,

Dr. Izea Katzap
President



Association of Holocaust Survivors from the former Soviet Union

אגודת נצולֵי שואה

Ave. Z Jewish Center, 875 Avenue Z, Brooklyn, N.Y. 11235

March 6, 2004

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The Honorable Edward R. Korman
United States District Judge
For the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: In Re Holocaust Victim Assets Litigation
Master Docket No. CV-96-4849

Dear Judge Korman:

Please find enclosed a courtesy copy of the Distribution Proposal of the Association of Holocaust Survivors from the Former Soviet Union. The original has been sent to the Clerk via Federal Express for filing in the above-referenced action.

Very truly yours,

Dr. Izea Katzap
President

IK/ls
Enclosure

cc: All counsel (via first class mail)

Holocaust Victim Assets Litigation (via U.S. Express Mail)
P.O. Box 8300
San Francisco, CA 94128-8300



Association of Holocaust Survivors from the former Soviet Union

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Via Federal Express

Clerk of the Court

United States District Court

For the Eastern District of New York

225 Cadman Plaza East

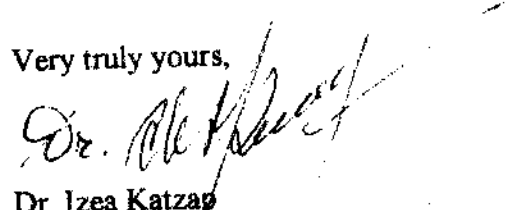
Brooklyn, New York 11201

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Master Docket No. CV-96-4849

Dear Sir or Madam:

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Very truly yours,


Dr. Izea Katzap
President

IK/ls

Enclosures

cc: All counsel (via first class mail)

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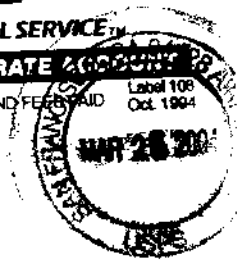


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