January 1st, 2004

Holocaust Victim Assets Litigation
P.O.Box 8300
San Francisco, California 94128-8300
United States of America

RECEIVED

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LEGAL SERVICES

Dear Sirs,

Attached please find a copy of our application to the Special Master in Israel.

Our application is part of the "Center of Organizations of Holocaust Survivors in Israel" framework.

The Committee for Commemoration, Legacy and Education of the survivors is an integral part of the "Center of Organizations".

Respectfully Yours,

Baruch Shub
Head of Committee
January 8, 2004

U.S. District Judge E.R. Korman,
U.S. District Court
Eastern District of New York
U.S.A

Case No. CV 96-4849 (ERK)(MDG)

Re: Allocation of Funds - Jewish Property
Center of Organization of Holocaust Survivors-
Commemoration, Legacy and Education Committee

BACKGROUND

.1 1945. The war was over. Thousands of survivors emerged from the death camps, ghettos, underground and forests. Some sick physically and mentally. They refused to go back to their homeland, there was nobody to wait for them. They gathered together, lived in the same camp huts, wore the same clothing. Survivors from Eastern Europe made to the west and joined them.

.2 Survivor Organizations appeared all over. Inmates from Aushwitz, Treblinka, Dachau. Ghetto survivors, Underground and anti-Nazi fighters, individuals in hiding, all joined hands to support each other. These Organizations formed in post-war Europe, were later transplanted to their new immigration countries. Israel received the majority of them.

.3 Most of the organizations of the early years exist until today. They enlarged their membership with each new wave of survivor immigrants. Lead by volunteers, they paid membership fees, received donations and cared for the old and sick, not forgetting their promise to the dead and fallen: "Never forget". With the years, when the membership fees declined, they had to rely more and more on outside aid.

CENTER OF ORGANIZATIONS OF HOLOCAUST SURVIVORS IN ISRAEL

.4 In 1988, a group of the organizations leaders initiated the merger of the survivor organization in Israel. The was majority of them (circa 45) joined the Center. A new life was injected. The Center, with the assistance of the American and Israel authorities, and World Jewish Organizations, initiated new approaches to German, Swiss and other bodies. The demand to rehabilitate the Jews for stolen property, gold, valuables, hidden bank accounts and insurance brought positive results.
The request to compensate for slave labor, ghetto workers, social security, health deterioration and others, resulted in allocation of funds for the survivors, especially for the sick, lonely and poor.

The new sources enabled also allocations for study and teaching the lessons of the Holocaust, to commemorate the victims and the fallen, and to "remember and not to forget".

Following is a partial list of the 45 organizations affiliated to the "Center of Organizations of Holocaust Survivors":

Organization of Bergen Belzen camp survivors
Organization of hard labor units survivors
Organization of Nazi handicapped survivors
Organization of "Yesh" - children and survivors
Organization of the Jews of Bukovina
Organization of ex-Nazi prisoners
Organization for survivors assistance
Organization of Zaksenhausen camp survivors
Organization of survivors from the ex Soviet Union and other ex-communist countries
Organization of the Hungarian Jews
Organization to commemorate the victims of Dachau-Landsberg-Kaupering
Organization of the Zaglembia Jews
Organization of Wohlin Jews
Organization of invalids in the war against the Nazis
Organization of Nazi invalids
Organization of Bulgarian Jews
Organization of the Sepharadic Jews
Organization of Partisans, Underground Fighters and Ghetto Rebels
Organization of Check Jews
Organization of Lodz Jews
Organization of "Mengele" children
"Anicho"
Bet Terezin

THE COMMEMORATION, LEGACY AND EDUCATION COMMITTEE

The Center of Organizations established this committee. Six million Jews were murdered in the Holocaust. Ninety thousand Jews fought the Nazis in underground activities, ghetto and concentration camps uprisings and partisan warfare. More than 50% perished. Thousands of individuals sacrificed their lives to save others. Many of the victims acted heroically before going to their death. Those who survived, those who were lucky not to be there should make good their promise "to tell and not forget".

Although it is obvious to everyone that the bulk of the resources should go to the sick, elderly and needy survivors still alive, it is also important to allocate funds for "cultural" needs. Teach the living, tell the world, explain to the "second generation", write memories and autobiographies. The holy obligation to immortalize and honor the dead martyrs and heroes, should now be realized.
COMMITTEE OBJECTS (REMEMBRANCE AND IMMORTALIZATION)

The committee has undertaken to coordinate its activities with Yad-Vashem, Beit-Halochemey-Hagetaot, Masua, Moreshet and others, but there are tasks that the Committee must do on its own:

7.1 PROJECT - memoirs and biographies

This project is to assist "common people" survivors, to publish their memoirs and biographies. These books are the best source of information for the holocaust and for millions of people, Jews and non Jews, children, students and future generations. It is probably the only source to learn about the holocaust.

Historians, researchers and scientists have wide sources of information. They have access to archives, museums and documentation. But much of their facts are based on the "common people" books, that is where they find the real facts of the holocaust. It is left to the "Commemoration, Legacy and Education Committee" of the "Center of Organizations of Holocaust Survivors in Israel", to care for those survivors and to assist them in publishing their memoirs or biographies. We believe that those publications are one of the best sources for future generations. We see the interest in them rising constantly.

The costs to publish is high and increase yearly, while the survivors are getting older and their financial resources fewer. We propose to establish a fund and a public committee of scholars and distinguished holocaust personalities, to initiate the program. Considering the age of the prospected writers, we recommend to start it as soon as possible.

Budget for memoirs and biographies (7.1)

In our survey among the publishing firms, we found that the cost of editing and publishing a book of approx. 300 pages, ranges from 38.000 I.S. (8450 $) to 48.000 I.S (10.670 $).

The cost of translating from Yiddish, Russian or French to Hebrew or/and from Hebrew to English is approx. 20.000 I.S.

Total cost including translation is 63.000 I.S.

Considering that the project is to publish 20 books within 2 years, of which half of them (10) to be translated, the total budget is:

\[(10 \times 63.000 \text{ I.S.}) + (10 \times 43.000 \text{ I.S.}) = 1.060.000 \text{ I.S.} = 235.5000 \text{ $} (1S = 4.5 \text{ I.S.})\]

(Note: 43.000 I.S. is an average figure).
7.2 PROJECT - Communities and remembrance days

Six million Jews were murdered, 4 million in the concentration and the death camps and about 2 million at the hands of the einsatzzgruppen S.S. (death squads). Thousand of Jewish communities were wiped out, most victims murdered and buried in mass graves. The universal custom to meet at the grave of the beloved and their visit ancestral homes is financially difficult and sometimes impossible to Holocaust survivors.

The survivors in Israel formed organizations and groups, to meet, console and remember the past. Hundreds of groups spread around the country. The day when most of the Jewish population was murdered, drawn or burned to death, become the remembrance day of their community.

It is on this day, when the survivors and their families gather to commemorate, light candles, say "Kaddish" and grieve for their victims. This is their commemoration, legacy and education day. The survivors arrive with their children, grandchildren and friends. The past of their community is told. Their future generation is actively involved.

But as times past, the organizations and groups become smaller and some have stopped their gatherings all together. Lack of funds prevented the hiring of a hall, some food and drinks etc.

Budget - Communities and remembrance days (7.2)

We suggest a 2,000 $ for each organization and group to enable the continuation of the gatherings. Considering that the allowance shall be distributed to some 50 organization, we require a total of:

\[ 2,000 \times 50 = 100,000 \] $.

With this sum, the organization should be able to organize, send invitations, hire a hall, buy biscuits and drinks and send money to the gentiles to maintain the graves, mow the grass and water the flowers around the tombstone and the mass grave.

7.3 Project - Second Generation

The generation of Holocaust survivors is now entrusting the legacy and commemoration of the Holocaust to the younger generations. "Second Generation" groups of sons, daughters, grandsons and granddaughters are active in Israel. Without their continuation, the Holocaust legacy and education will slowly disappear. They are going to be our future "ambassadors" to fight anti-Semitism and Holocaust denial. They shall conduct lectures and seminars even abroad.

A. Budget - Running Expenses (7.3)

This budget is proposed for a one group of "future generation", for a 2 year period.
1. Rent of premise (2-3 room office in midtown) - $1,100 / month
2. Secretary (part time) - $800 / month
3. Electricity, telephone, postage, taxes etc. - $400 / month
4. Other expenses - $500 / month

Total running expenses per month - $2,000 / month
Total running expenses 24 months - $48,000

B. Budget - Basic Expenses

1. Office equipment (computer etc.) - $4,000
2. Electronic and musical devices (T.V., DVD.) - $3,000
3. Office equipment (desks, book shelves) - $2,000
4. Club equipment (tables, chairs etc.) - $4,500

Total basic expenses - $13,000
Total budget for the activities of "second generation" group - $51,500

We recommend to start and equip two "second generation" centers in Israel for a total of $103,000 for a 2 year period.

7.4 PROJECT - Monuments and Memorials

When war of independence (1947 - 1948) broke out, many Jewish survivors were called to arms. Some recently arrived, some straight from the ships. It is estimated that about 35% of the war victims were survivors.

A recent survey revealed that 275 of the fallen were young men and women, who died on the battlefields without leaving a single soul to remember them. They were last members of large families perished in the Holocaust. Their graves are scattered all over Israel. Due to intensive activity of some of their friends and our committee, we convinced the authorities to jointly erect a monument on Har-Herzel to the memory of this group (The "last of the family").

Furthermore, Yad-Vashem agreed to allow building a passage, connecting Yad-Vashem with Har-Herzel and to enable visitors of Yad-Vashem museum, to climb the passage and visit the monument and the more than 20 others on Har-Herzel. This is what we call: "FROM HOLOCAUST TO INDEPENDENCE".

But monuments cost money and this monument including the landscape shall cost approx. $90,000. We are asked to participate in 1/3 of it, namely $30,000. Another monument by one of our well-known sculptors Mr. Alexander Bogen is planned to be erected in Tel-Aviv in one of the main squares. The cost of this monument with the architecture and landscape should cost approx. $120,000.

We shall try to find sponsors and our part in it is approx. 1/2 = $60,000.

Budget (7.4)

Total cost for monuments and memorial - $90,000
7.5 **PROJECT - Video taped evidence of former Ghetto and camp rebels, Underground Fighters and Partisans**

This project was postponed several times due to lack of funds. If we wait much longer, we shall not be able to collect evidence due to lack of witnesses. Several projects of video tape libraries were undertaken in the last years. Well-known are the Spielberg library, the Yale University video-tapes, Yad-Vashem and others.

But those were unfortunately evidences covering the survivors holocaust past, without underlining anti-Nazi fighting and resistance period. Today it would be an impossible task to extract the particular period even if it exists on the tapes. It is mandatory to start collecting rebels, underground fighters and partisans evidence, as soon as possible.

**Budget (7.5)**

It was difficult to find out the costing of such a program. Time worked against us. We recommend therefore to initiate a pilot program for videotaping, survivor-fighters and submit the budgeting at a later date. We feel that such a library will be very important for scholars and historians in the future.

**Recommended to start with - 60,000 S.**

7.6 **PROJECT - "Live evidence" and lectures**

The Survivors and Fighters have been active voluntarily for many years in giving "live evidence" and lectures in schools, army units, memorial institutions and many other places as required.

Thousands of hours were lectured in Yad-Vashem, Bet-Lochamey-Hagetaot, Masua, Moreshet and others, all this without any remuneration and most of the times without expense allotments.

But survivors are also only human, and we think that it would be only fair to open a fund and a centralized organ to assist those survivors, with some allotments for their effort and expenses, and to centralize the availability of the many survivors, participating in the "live evidence" and lecturing program.

**Budget (7.6)**

**Suggested administration and expenses - 30,000 S.**

7.7 **PROJECT - International conference of survivors**

The unity and cohesion of the holocaust survivors is one of the most important assets when dealing with international bodies.

During the years, when the survivors were younger and money was easier, we organized our international meetings without much outside help. But times changed. In 2005, we shall commemorate 60 years of freedom. In 1945, the last concentration camps were liberated and the survivors reappeared.
We shall hold an international gathering, maybe the last one, for the survivors, summarizing our struggle for life, the efforts against anti-Semitism and the Holocaust denial and most importantly the education of the future generations. The last international costing was approx. 190,000 I.S. (40,000 $).

**Budget (7.7)**

We hope to receive the sum of $40,000 to organize the 2005 international gathering of the Holocaust survivors.

The total budgeting of our programs in 2004 and 2005 is as follows:

| (7.1) Memoirs and Biographies          | - 235,500 $ |
| (7.2) Communities and Remembrance days | - 100,000 $ |
| (7.3) Second generation               | - 103,000 $ |
| (7.4) Monuments and Memorials         | - 90,000 $  |
| (7.5) Video taped evidence (fighters) | - 60,000 $  |
| (7.6) Live evidence and lectures      | - 30,000 $  |
| (7.7) International gathering         | - 40,000 $  |

**Total**                                                                 | - 658,500 $ |

Respectfully Yours,

Noach Flug, Chairman  
Center of Organization of Holocaust Survivors in Israel

Baruch Shub,  
Head of Committee  
Commemoration, Legacy and Education
Holocaust Victim Assets Litigation

U.S.A.

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TEL AVIV-CENTRAL POST OFFICE
417019
25/01/2004 15:09
0.100
52.00

POSTAGE 2.14 ŞILİN
82.00

I certify that the declaration is correct and that the goods do not contain any dangerous or prohibited article.

Signature of Sender

Contents

Weight (kg)

Value

1. [Handwritten text]

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The Hon. Edward R. Korman  
Chief Judge of the U.S. District Court  
For the Eastern District of New York  

Jerusalem, January 29, 2004

Re: Activities and Projects for Holocaust Survivors

Dear Judge Korman,

The Center of Organizations of Holocaust Survivors in Israel is a roof-organization of more than 45 organizations of survivors, which represent over 500,000 survivors in Israel. We would like to recommend the allocation of grants from the Swiss Bank Settlement under your responsibility for the following projects and activities:

Yad Vashem Authority
Yad Vashem Remembrance Authority is the most important organization in Israel for Holocaust studies, documentation and remembrance.

Foundation for the Benefit of Holocaust Survivors
This fundation renders medical and welfare assistance for tens of thousands of elderly and needy Holocaust survivors for their basic needs.

Amsha
Amsha is the only organization in Israel which gives Holocaust survivors psychiatric assistance and organizes social centers in different locations in Israel. Tens of thousand of survivors visit these centers in order to get professional help with their mental problems caused by their suffering during the Holocaust.

Chichte Fighters, Morasha and Menus
These three organizations are among the most important bodies in the world for the immortalization of the legacy of the Holocaust.

Center of Organizations of Holocaust Survivors in Israel
Among its other activities for the benefit of survivors the Center has initiated a special project of writing the memoirs of thousands of Holocaust survivors. There is a need for an allocation in order to enable the completion of this important project. We are convinced that the vital activities described above and are attached hereby in detail, will be given priority by you in the distribution of the general funds of the Swiss Bank Settlement.

Your Sincerely,

[Signature]

Noach Flug  
Chairman