

LEGISLATION OF 1943-45 REGARDING THE EXPROPRIATION OF JEWISH PROPERTY

Premise

This chapter covers the legal measures and other actions taken to the detriment of persons defined as “of Jewish race” over the period 8 September 1943 to the end of April 1945. The area of reference is the Italian territory under the Italian State that ultimately defined itself as the Italian Social Republic (RSI) and those areas within Italy that came under the military, police and administrative structures of the Third Reich; in effect, these corresponded to the central and northern regions of the peninsula, given that those in the south were liberated by the end of September 1943 and thus did not see the introduction of further persecutory measures.

The main focus now is on property and real estate ownership, given that the questions relating to work activities and social assistance had to a great extent become moot. A prime consideration is that over this period the conditions faced by Jews were largely determined by persecutory measures directed against their very survival, with the juridical definition of “a Jew” still being determined by the norms laid down in 1938 (other aspects of persecution that had been introduced in that year also remained in force). For an overall picture of the deportations and the persecutory measures, see L. Picciotto Fargion, *Il libro della memoria. Gli Ebrei deportati dall'Italia (1943-1945). Ricerca del Centro di Documentazione Ebraica Contemporanea*, Milan 1991; M. Sarfatti, *Gli ebrei nell'Italia fascista. Vicende, identità, persecuzione*, Turin 2000.

The summary offered here cannot be considered exhaustive. Some of the measures and events concerned are described solely through examples and broad quantifications. In some cases, the measures and their concrete effects are described and analysed in greater detail in other chapters of the Report.

1. The General Picture

The seizure of Jewish property in Italy over the period of 1943-1945 took place whilst the Jews themselves were either being arrested and deported or else having to flee into hiding (thus abandoning their homes and other property and assets).

1.A. THE TERRITORY, THE GOVERNMENTS , THE JEWS

In North-East Italy, the authorities of the Third Reich immediately set up two special ‘zones’: the *Operationszone Alpenvorland* (the Prealpine Operations Zone, which covered the provinces of Bolzano, Trento and Belluno) and the *Operationszone Adriatisches Küstenland* (Adriatic Coast Operations Zone, which covered the provinces of Udine, Gorizia, Trieste, Pola, Fiume and Lubiana). In each of these, the Germans took over both military and civil control. In the rest of the peninsula, they exercised military authority alone, whilst civil government was taken over by the new Italian fascist administration; this latter was formally set up on the 23 September, when Mussolini announced from Germany the composition of the government of the new Fascist State (on 1 December 1943, this State would take the name of the *Repubblica Sociale Italiana*, hereafter RSI).

The Jews who were already in Central and North Italy had by this point been joined by some 1,300-1,500 foreign Jews who, after 8 September, had hurriedly fled into the peninsula from south-eastern France.¹ Overall, the persons in Central and North Italy classified as “of Jewish race” – and thus subject to the new persecution against physical survival – numbered around 43,000, divisible into around 8,000 who were foreigners or Italians who had been stripped of their citizenship² and around 35,000 Italian citizens.³ Distribution through the different regions varied, with a particularly high percentage in Rome (the city being home to about one quarter of all Italian Jews).

¹ K. Voigt, *Il rifugio precario. Gli esuli in Italia dal 1933 al 1945*, La Nuova Italia, Florence 1996, vol. II, pp. 400, 413-421.

² *Ibid.*, pp. 399-400.

³ M. Sarfatti, *Gli ebrei nell'Italia fascista. Vicende, identità, persecuzione*, Einaudi, Turin 2000, p. 232, note 8.

Of all of these, about 500 people managed to cross the frontier (sometimes going around it, via the Adriatic) and reach the southern regions of the country. Another 5,500-6,000 managed to take refuge in Switzerland. Around 7,700-7,900 people classified as persons “of Jewish race” were arrested within the peninsula as a whole and were then deported or killed within Italy; this total does not include the more than 200 arrested in the Yugoslav territories of Arbe and Susak who were transferred to Trieste. The precise figures available today are: 6,720 identified deportees (5,896 of whom were killed; 824 surviving); 680-880 unidentified deportees (most presumably killed) and 299 killed in Italy (either in mass slaughters or otherwise due to the actions of their persecutors).⁴ The remaining 29,000 people classified as persons “of Jewish race” lived in hiding until the Liberation; of these, about one thousand took an active part in the Resistance.⁵

1.B. ARRESTS, DEPORTATIONS, MASS KILLINGS

In the Prealpine and Adriatic Coast Operation Zones, the official implementation of this new phase in the persecution against the Jews was the work of the Germans alone, whilst in the other regions of Central/ North Italy it was the work initially of the Germans but then also involved the collaboration of Italians.

1.b.1. Within the German administration, the arrest of Jews was the responsibility of a part of a special police force: Section B4 of Office IV (*Geheime Staatspolizei/ Gestapo*; State Secret Police) of the Security Police (*Sicherheitspolizei-Sicherheitsdienst/ Sipo-SD*; Security Police and Security Services) – a section that answered directly to the central office of the latter (*Reichssicherheitshauptamt/RSHA*; Reich Security Head Office). The Italian command office of the Sipo-SD was located at Verona, with two partially independent branches in the Operations Zones.

German actions against the Jews began immediately after 8 September. In the Bolzano zone, the arrests got underway quickly, carried out by the newly-instituted local security police (SOD) and by the Sipo-SD. Between mid-September and early October, squads of the German Army and military police interned the Jews of the Cuneo area and those within the province of Ascoli Piceno; and rounded up and killed Jews who lived on the Piedmont side of Lago Maggiore. The first of these operations was linked with the particular circumstances in the Cuneo area, whilst the other two were probably motivated by general considerations of “security”; they went along with the confirmation – or re-introduction – of internment measures against foreign Jews. Again for reasons of “security”, other bodies of German police – for example, those located on the frontier with Switzerland – would, throughout the period of the Occupation, continue with the arrest of individual Jews who were then handed over to the special police.

Shortly after the middle of September, this special section received the order to apply to Italian Jews within Italian territory all the anti-Jewish measures that had been in operation for many months within other countries in Europe.⁶ The first arrests carried out by Section IV B4 were made on Saturday 9 October in Trieste, where – as has already been mentioned – an autonomous police apparatus was in operation. Then, on Saturday 16 October, came arrests in Rome, which were followed (in late October-early November) by the rounding-up of Jews in Tuscany, Bologna and within the triangle defined by Turin, Genoa and Milan. None of the victims was spared on the grounds of age, sex or health; however, in the months of late 1943, the German police either did not arrest or immediately released Jews who were citizens of certain specific States or had a spouse or parent who was “of Aryan race.” After the RSI became directly involved in the arrests, the round-ups organised by the Sipo-SD diminished in both number and extent.

1.b.2 As for the Italians, they had no special police section responsible for the arrest of Jews. These were carried out by bodies that answered to the Head Office for Public Security in Valdarno

⁴ Data taken – or deduced – from that given in L. Picciotto Fargion, *Il libro della memoria. Gli Ebrei deportati dall'Italia (1943-1945)*. *Ricerca del Centro di Documentazione Ebraica Contemporanea*, Mursia, Milan 1991, pp. 25-27, 29-30, 32; on the Jews transferred from Arbe, see *ibid.*, pp. 866-867, J. Romano, *Jevreji Jugoslavije 1941-1945. Zrtve genocida i ucesnici nor*, Saveza Jevrejskih Opstina Jugoslavije, Beograd 1980, p. 151. The total number of victims arrested within or moved from Italy was 7.049 (identified), 900-1.100 (so far unidentified); L. Picciotto Fargion, *Il libro cit.*, pp. 25-27.

⁵ M. Sarfatti, *Gli ebrei cit.*, p. 282.

⁶ *Ibid.*, pp. 240-241.

(Vicenza) – that is, to the Chief of Police and to the Ministry of the Interior (both of which were located at Toscolano Maderno in the Brescia section of the shores of Lake Garda). The Head Office for Demography and Race at the Ministry of the Interior and the new General Inspectorate for Race that answered to the Office of the President of the Council of Ministers never had specific jurisdiction with regard to the arrests.

The first clear statement of the RSI's anti-Jewish policy came on 14 November 1943, when the first assembly of the new *Partito Fascista Repubblicano* (PFR), held in Verona, approved a 'programme manifesto' whose seventh point stated: "Those belonging to the Jewish race are foreigners. During this war they are enemy nationals."⁷ On 30 November the Minister of the Interior issued "police order No.5", which required the arrest of "all Jews [...] of whatever nationality" and their internment in "concentration camps in each province, prior to their being put together in specially equipped concentration camps."⁸ From 1 December onwards, RSI Prefects (now called "Heads of Province") began to set up their province's internment camps (sometime using for the purpose either prisons or buildings that belonged to the Jewish community)⁹; at the same time, the police chiefs began the arrests.

Amongst the Italians, too, those that made a sizeable contribution to these arrests were the authorities responsible for controlling the border with Switzerland. Proud of the fifty arrests made "since the early days of October" and of the "sizeable quantity of valuables" sequestered on such occasions, on 12 December 1943 the Commander of the II 'Monte Rosa' legion of the Republican National Border Guard wrote to the Head of Province in Como: "In escaping to the hospitable land of Switzerland, the refuge of rabbis, the Jews hope to avoid the providential and concise laws of Fascism. But their the flight across the border is obstructed by the vigilant patrols of the Republican National Border Guard, who indefatigably - at any time, in all weather conditions and along even the most dangerous routes - are quite happy to serve long turns of duty in order to defeat the dark and threatening activities of these cursed sons of Judas."¹⁰

The RSI either did not arrest or else subsequently released Jews who were Rumanian, Swiss or Turkish.¹¹ As for the others, on 10 December 1943 the Chief of Police ordered that exemptions from arrest should also be extended to Italian Jews who were "gravely ill" or else over seventy years of age; "for now" he included in that exemption those Italian Jews who had a spouse or parent classified as "Aryan". On 28 December, the Minister of the Interior pointed out that such rulings were simply intended to "establish gradual flow in the rate of consignments to concentration camps"; however, on 20 January 1944, that same minister gave instructions to "defer" the arrest of members of mixed families – without any specification of nationality – and two days later the Chief of Police informed the Heads of Province that the arrest of these latter was "for the moment suspended". On 7 March the latter confirmed that all members of mixed families – foreigners included – were "excluded" from the internments, and reiterated the exemptions for those who were seriously ill or those over seventy years of age (extending these to foreign Jews as well). No other exemptions were made; what is more, it would seem that there was a move toward limiting those that had already been granted.¹²

1.b.3 The Jews arrested by the Germans and Italians were grouped together in prisons or concentration camps and then deported by the Germans to the camp of Auschwitz; the train convoys either travelled directly or – as was the case with those arrested in September 1943 in Alto Adige and the Cuneo area – made an intermediate halt at the camps of Reichenau and Drancy (in Austria and France respectively). From 1944 onwards, Jews of English nationality – or who were nationals of an "enemy" or "neutral" State - were deported to the camp of Bergen Belsen. Initially,

⁷ B. Mussolini, *Opera omnia*, La Fenice, Florence, undated, vol. XXXV, p. 410; see also the newspapers of 17 November 1943.

⁸ ACS, MI, DGPS, div. AAGRR, *Massime* (part not yet catalogued), R9, b. 80, fasc. 19, Minister of the Interior to Heads of Province, 30 November 1943.

⁹ L. Picciotto Fargion, *Il libro* cit., pp. 833-834; Klaus Voigt, *Il rifugio* cit., vol. II, pp. 428-429.

¹⁰ ASCo, *Prefettura, Gabinetto*, II versamento, b. 109, fasc. 192, and other *fascicoli*.

¹¹ M. Sarfatti, *Gli ebrei* cit., p. 255.

¹² *Ibid.*, pp. 255-257.

the convoys would set off from the places where the arrests had first been made; however, from February 1944 onwards they set off from the Italian concentration camps within which the arrested Jews had been gathered together: Fossoli di Carpi in the province of Modena and (from August 1944) Bolzano-Gries. In the Adriatic Coast Operation Zone, all the Jews arrested by the Germans were held in Trieste, first in the prison of Coroneo, then in the concentration camp of the San Sabba Rice Mill; from there they were deported to Auschwitz.¹³

1.b.4 The largest mass killing was that carried out by the Germans at the Fosse Ardeatine in Rome on 24 March 1944, when as a reprisal some 75 Jews and 260 non-Jews were slaughtered. The second largest occurred earlier, when between 15 September and 11 October 1943 the Germans killed some 56 Jews on the Piedmont shore of Lago Maggiore, in the area around Lago d'Orta and in Novara. The most serious mass killing carried out by Italians – the last, chronologically – occurred when 6 Jews held in the Cuneo prison were slaughtered in an explosion of vindictive rage on 26 April 1945.

2. Application of Measures regarding Seizure of Property

Whilst the limits on property ownership imposed in the period 1938-43 and the arrests carried out in 1943-45 were substantially governed by the measures relating to each, the seizure of property that occurred in the years 1943-45 was more hybrid, involving the 'regular' application of the relevant norms and regulations, 'irregular' application thereof and also simple theft and dispossession of various kinds (these latter are not dealt with here).

2.A THE MEASURES INTRODUCED BY THE RSI

The new Italian regulations regarding Jewish property were drawn up and made law at the same time as those concerning the arrest of the Jews.

2.a.1.1 Various norms were applied with regard to the property "formally" seized from the pockets and hands of Jews **at the moment of their arrest** (money, foreign currency, jewels, valuables, suitcases, etc). In some cases, this was sequestered or confiscated on the basis of the general regulations regarding Jewish property (see **2.a.2.1** and **2.a.3.1**). In other cases, such property was 'treated' as coming under different norms: it might be seized by the authorities responsible for the initial detention of the Jew; by those who were responsible for his/her movement from one prison to another; or by the police or judicial authorities. In the latter case, this was justified on the basis of the fact that a Jew arrested near the Italian-Swiss border was charged with trying to leave the country illegally, or else with the smuggling of goods or currency (this latter came under the Norms for the Repression of the Violation of Currency Regulations which had been passed on 15 December 1938 to punish the clandestine export of currency by those foreign Jews who were then being expelled from the country).

Information regarding the registered deposit of valuables at the places where the Jews were detained and imprisoned is still sketchy, and what ultimately became of such property is almost always uncertain. On 30 March 1945, the Head of Province in Bologna informed the Director of Prisons there of the need to proceed to the formal confiscation of "the deposits of objects, money, valuables, stocks and bonds, etc. belonging to Jews, which now exist in said Prisons." And on the 10 April, the Director sent him a list of 37 such deposits (ranging in value from 9 to 5,077 lire) belonging to Jews who had been transferred from that prison, some more than a year before.¹⁴ On 17 March 1944 the Head of Province in Verona asked the Rome Police Chief to send on to him the various sums (ranging from 250 to 50.230 lire) that had been sequestered from nine Roman Jews who had been arrested in Rome and temporarily transferred to Verona to await deportation; his reason was the need to "meet the substantial costs of providing board and lodging" for the nine.¹⁵ In March 1944 the Post Office in Monticelli Terme returned savings books (with deposits ranging from 800 to

¹³ L. Picciotto Fargion, *Il libro cit., passim*.

¹⁴ ASBo, *Prefettura, Ufficio amministrazione beni ebraici*, b. 4, fasc. 4, sfasc. 11, Head of Province to Prison Governor, 30 March 1945; the latter's reply, 10 April 1945, with list enclosed.

¹⁵ ASVr, *Prefettura*, b. "Beni ebraici", fasc. s.n., Office for the Identification and Administration of Jewish Property in Verona to the Head of that Province, 13 March 1944; Head of Province in Verona to the Rome Police Headquarters, 17 March 1944 (carbon copy).

10,000 lire) to Jewish women about to be transferred from the camp in that town to the Fossoli camp.¹⁶

In a report to the local Head of Province regarding the 58 Jews arrested in that province up to 12 December 1943, the commander of the 'Monte Rosa' II Legion of the Republican National Border Guard pointed out that they were "Jewish groups, as usual hiding in their more or less ragged bundles, valuables and currency subtracted from the wealth of the Nation;"¹⁷ the fact that such valuables were defined in this way may in part have played a role in determining where they ultimately ended up (see **2.a.4.1**). On the other hand, we know absolutely nothing about what happened to the property (including 4,423 lire and various objects in gold) that was confiscated from five Jews arrested in Valdossola on 28 December 1943 by the same corps of the border guard and then charged with trying to leave the country illegally (they would even be tried – in their absence, given that they had already been deported to Auschwitz).¹⁸

2.a.1.2 In the weeks between 8 September 1943 and the beginning of November that same year at least one provincial authority instituted a **first local measure** regarding Jewish property. On 19 October 1943 the Head of Province in Como ordered all the banks within the province to inform him "within 24 hours" of the amounts in accounts and deposits of whatever kind held by "citizens of Jewish race"; the banks were also ordered to impose a thirty-lire-per-day limit on withdrawals by the same.¹⁹ This measure – like all the subsequent local and national ones regarding this matter – was applied with reference to the lists of persons "of Jewish race" provided either by the local police office (in this case) or by other state offices.²⁰

Amongst the local measures that were not explicitly directed against the Jews one might mention the orders given by Heads of Province at the end of October with regard to the procurement of housing for the homeless or those who had lost their homes due to air raids; the housing mentioned includes "that not permanently occupied" or that "which has been rented out but stands empty."²¹ One can see some connection here with the fact that on 5 November the Head of Province in Grosseto had asked the *podestà* to inform him of the "number of Jews in each town [...] how they are housed" and – with regard to each household – "the number of family members and the number of rooms occupied."²² Over this period, the police authorities in Asti, too, were conducting a similar survey, which resulted in a list indicating which Jewish families were absent and whether their apartments were standing empty or had been assigned to those who had been evacuated from their own homes.²³

2.a.1.3 On 5 and 6 November the newspapers gave the **first announcement** of the forthcoming introduction of new regulations and measures: the Minister of the Interior, it was said, was about to submit to Mussolini a proposal for a new law on the "racial question", including "the confiscation of Jewish assets and real estate."²⁴

Then, as already mentioned, on 14 November 1943 the first assembly of the PFR, in Verona, ruled amongst other things that "those belonging to the Jewish race are foreigners. During this war they are to be considered as enemy nationals."²⁵ In the course of his work for the Assembly, the Secretary of the PFR, Alessandro Pavolini, stated that "measures are being taken to seize the

¹⁶ See the chapter "Parma".

¹⁷ ASCo, *Prefettura, Gabinetto*, II versamento, b. 109, fasc. 192, and other *fascicoli*.

¹⁸ P. Bologna, *Processo a una famiglia ebrea*, "Almanacco ossolano 1998", Novara 1997, pp. 50-53.

¹⁹ ASCo, *Prefettura, Gabinetto*, II° vers., b. 109, fasc. "Blocco conti ebraici", Head of Province in Como to the Police Chief in Como, with a copy to the Command of German military forces there, 19 October 1943.

²⁰ *Ibid.*, various letters from banks with annotations jotted down by third parties.

²¹ For the directives from the Heads of Province in Milan and Turin - 16 and 25 October 1943 - see *Corriere della Sera*, 17 October 1943, and *La Stampa*, 27 October 1943.

²² ASGr, *Prefettura*, b. 758, Head of Province in Grosseto to the province's *podestà* and Fascist Party secretaries, 5 November 1943; quoted in L. Rocchi (ed.), *La persecuzione degli ebrei nella provincia di Grosseto nel 1943-44*, Istituto storico grossetano della Resistenza e dell'età contemporanea, Comune di Grosseto - Amministrazione provinciale, Grosseto, 1996, p. 12.

²³ ASAt, *Questura*, cat. "Ebrei", fasc. s.n., "Elenco delle famiglie ebree della città di Asti che hanno lasciato disabitato il loro appartamento", 10 November 1943.

²⁴ *Il regime fascista*, 5 November 1943; *Corriere della Sera* and *La Stampa*, 6 November 1943, and other newspapers.

²⁵ See note 7.

property of Jews [in order to] meet the needs of the victims of bombing raids.”²⁶ Both of the two statements made in Verona were of a political nature rather than being actual pronouncements of new norms and regulations. However, the former made an implicit reference to the “sequestration” of the property of “enemy” nationals and organisations, a measure for which there were already provisions in the war law approved by royal decree on 8 July 1938 (rdl 1415/1938) and the further regulations concerning the “treatment of enemy property” included in rdl 618/1941 of 10 March 1941. As for the latter statement, it confirmed what had been said in the press regarding these “confiscations” and indicated the official use for such funds.

2.a.1.4 At present we know of only one case of a local authority giving autonomous concrete form to the political declaration of 14 November 1943 (**2.a.1.3**) – that is, taking measures for a **general sequestration of property before the issuing of the order that came on 30 November (2.a.2.1)**. On 16 and 17 November 1943 the Head of Province in Grosseto issued the following instructions with regard to the property of Jews “who are to be considered citizens of a nation that is an enemy of Italy”:²⁷ there was to be “the immediate sequestration of all the real estate [...] belonging to citizens of the Jewish race”²⁸; “an inventory of all the merchandise existing in [...] and surveillance of the warehouses run by [...] companies of the Jewish race”;²⁹ and “an immediate freeze on all credits and accounts at post offices, credit institutions, banks and companies held by citizens of Jewish race.”³⁰

2.a.1.5 On 24 November 1943 the Council of Ministers approved the first legal measure regarding Jewish property: a legislative decree of Mussolini’s that required the Jewish owners of **works of art and archaeological, historical and bibliographical artefacts** to report such property to Heads of Province, who would then sequester it upon request from the relative superintendents - where compatible, in line with the procedures laid down by the war law. The measure applied to both “persons of Jewish race and Jewish institutions.” The Heads of Province could automatically confiscate any such property that was not reported. The measure also declared null and void any transfer of ownership that had occurred after 23 November 1943, and also envisaged the possibility of doing the same for those which had occurred before that date.³¹ However, even though on 17 March 1944 the Office of the President of the Council of Ministers informed ministers that the legislative decree (dated 2 March 1944) was finally “under publication,”³² it was never published in the *Gazzetta Ufficiale d’Italia* and thus never actually came into effect. In spite of this, as early as 1 November 1943, the Minister of Education, who had first proposed the decree, circulated it as effective and many offices viewed it as having come into force.³³ During 1944 the seizure of such artistic artefacts and property became part of the more general strategy of confiscations (see **2.a.3.4**).

The circular of 1 December 1943 also laid down that “the *podestà* must, by 20 December, transmit to the Heads of Province not only the reports [of works of art] but also a list of all the citizens of Jewish race residing within the areas of their towns.”³⁴ These lists were intended to be sent on to the

²⁶ V. Paolucci, *La Repubblica sociale italiana e il partito fascista repubblicano*, September 1943 March ‘44, Argalia, Urbino 1979, p. 157.

²⁷ ASGr, *Prefettura*, b. 698, order of the Head of Province in Grosseto n. 3833, 16 November 1943.

²⁸ *Ibidem*.

²⁹ *Ibid.*, b. 698, order of the Head of Province in Grosseto n. 3825, 16 November 1943.

³⁰ *Ibid.*, b. 765, order of the Head of Province in Grosseto n. 3884, 17 November 1943; quoted in L. Rocchi (ed.), *La persecuzione* cit., p. 16.

³¹ ACS, *RSI, PCM*, b. 138, fasc. 7, “Consiglio del 24 November”; *Il regime fascista*, 26 November 1943; *Corriere della Sera*, 30 November 1943; ACS, *RSI, PCM*, b. 67, cat. 5-2, fasc. 2823, sfasc. 1, text of the law bearing the date 2 March 1944; quoted in M. Sarfatti, *Documenti della legislazione antiebraica. I testi delle leggi*, in *La rassegna mensile di Israel*, vol. LIV, n. 1-2, January-August 1988, pp. 55-57.

³² ACS, *RSI, PCM*, b. 67, cat. 5-2, fasc. 2823, sfasc. 1, Undersecretary for the Office of the President of the Council of Ministers to government ministers, 17 March 1944.

³³ Documentation regarding the sequestration of the works of art owned by Jews can be found in the various *Prefettura* collections of material in local State Archives and in the various Superintendencies for the Artistic Heritage.

³⁴ Printed circular n. 665 from the Ministry of Education (Head Office for the Arts) and signed by the minister himself, sent to all Heads of Province, Superintendents and Heads of local revenue offices, dated 1 December 1943. Conserved in the various *Prefettura* collections of material in local State Archives.

superintendencies for artistic/archaeological artefacts together with the reports of such property; however, the fact that they passed through prefectures would, in certain provinces, result in an updating of information regarding the Jews present in a particular district.

2.a.2.1 On 30 November 1943 the Minister of the Interior issued **police order n. 5**. This not only required the arrest and internment of “all” Jews foreign and Italian – whether or not they enjoyed “discriminatory” exemption – but also gave the first concrete expression in norms and regulations to what had been suggested by the press leaks and statements made in mid-November. “All their property, both chattels and real estate, is to be immediately sequestered, prior to confiscation by the RSI, which will use it for the benefit of those citizens who are victims of enemy air raids.”³⁵ The order concerned solely the property of single individuals; it made no reference to the sub-division of 1938-39 between the “allowed” quota of real estate and that which exceeded such allowance, nor did it envisage exceptions on the basis of the value or character of such property.

In various provinces - for example, Brescia, Mantua, Savona, Verona and Venice - the orders to sequester property made explicit reference to the war law (rdl 1415/1938). In the first four of those mentioned there was also reference to the order of 30 November, whilst in Venice all that was stated was that the owner of the sequestered property was a Jew “and therefore to be considered an enemy.” The rdl 1415/1938 had included (in article 296) the requirement that the sequestration be ordered by the Prefect (the ‘Head of Province’ in the RSI) and also (in article 298) that notice of it then be published in the *Gazzetta Ufficiale del Regno d’Italia* (in the RSI, the *Gazzetta Ufficiale d’Italia*).

From 1 December onwards each of the Heads of Province would issue one or more directive containing instructions to citizens with regard to the application of the police order n.5 of 30 November. Many of them (on the basis of war law rdl 1415/1938, which had been further supplemented on 19 December 1940 by rdl 1994/1940) informed “Aryan” citizens and bodies of the obligation to inform Prefectures (and suspend repayment) of any debts owing to Jews (cf. rdl 1415/1938, art. 309-311; rdl 1994/1940, art. 1-2) or of their temporary possession of Jewish property (cf. rdl 1994/1940, art. 2). The instructions also reiterated the invalidity of any new transfer of ownership of Jewish property (cf. rdl 1415/1938, art. 312), etc.³⁶ “Aryan” citizens and bodies were, at the same time, informed that those contravening these laws would be “punished as laid down in the war law”³⁷ – that is, “charged with taking undue possession of the property of the State and of aiding and abetting enemy nationals.”³⁸

The Head of Province in Ferrara ordered that “the review of all the transfers of property between Jews or from Jews to Aryans should go back as far as 1 January 1937, and the investigations should also be extended to the transfer of stocks and bonds and to the establishment or transformation of limited companies.”³⁹ The Head of Province in Florence pointed out that the requirement to report such matters to the Prefecture also applied to “all transport and haulage companies and private hauliers that have, since 1 December 1943 (XXII), been involved – or are involved – in the transfer, removal or dispatch of their [the Jews’] goods, furnishings or other property.”⁴⁰ In Bologna at least one haulage and storage company did report that its warehouses contained the household effects of two Jews (who had emigrated in 1939).⁴¹

In almost all the provinces, special offices were set up to receive these reports, to ascertain the existence of further assets, to prepare the orders for sequestration and then organise the official administration of the property. From February 1944 such offices operated under the provisions of

³⁵ See note 8.

³⁶ Statements issued by the Heads of Province in Milan, Venice and Florence, published in *Corriere della Sera*, 17 December 1943; *Il Gazzettino*, 21 December 1943; *La Nazione*, 1, 5 and 20 January 1944.

³⁷ Statement issued by the Head of Province in Venice, published in *Il Gazzettino*, 21 December 1943.

³⁸ Statement issued by the Head of Province in Florence, published in *La Nazione*, 20 January 1944.

³⁹ ASFe, *Prefettura*, el. 24, b. 3, fasc. “Sequestro beni ebraici”, Head of Province in Ferrara to Head of local revenue office, Vice-Prefect and Police Chief, 13 January 1944 (carbon copy).

⁴⁰ Statement by Head of Province in Florence, published in *La Nazione*, 20 January 1944.

⁴¹ ASBo, *Prefettura, Ufficio amministrazione beni ebraici*, b. 3, fasc. 1: “Società nazionale trasporti flli. Gondrand”.

the new dlgs 2/1944 (**2.a.3.1**). Both before and after that date, the actions of a number of them exceeded the guidelines and criteria laid down by the laws of the RSI (**2.a.4.1**).

2.a.2.2 The formal **extension to Jewish bodies and organisations** of such sequestration and confiscation came with an order issued to all the Heads of Province by the Chief of Police on 28 January 1944. This stated that “all Jewish communities are to be disbanded and their property sequestered”⁴² (see also **2.a.3.2**). Seven days later, the Chief of Police also gave orders to investigate the “fate” of the works of art “that had been in the synagogues.”⁴³

In at least one case (Venice), the Head of Province issued a sequestration ruling similar to that issued against individuals as a result of the order of 30 November (**2.a.2.1**); this contained the observation that “as the Israelite community of Venice is of the Jewish race, it is to be considered on a par with the enemy.”⁴⁴ In at least one case (Modena), the Head of Province issued an order of confiscation similar to those issued against individuals under the provisions of the dlgs 2/1944 (**2.a.3.1**); as this order observed “[it had been] ascertained that the Israelite Community of Finale Emilia belongs to the Jewish race as understood by art. 8 of the rdl of 17 November 1938, n. 1728”.⁴⁵

2.a.2.3 After the publication of the dlgs 2/1944, which laid down the confiscation of property belonging to Jews (**2.a.3.1**), the Heads of Province were expected to take the steps necessary **to transform sequestration into confiscation**. The Ministry of Finance took this for granted in the first circular of implementation regarding the dlgs 2/1944, which was issued on 12 February of that year: “the seizures and sequestrations carried out by the Heads of Province or by police offices as a result of the order of 1 December [*sic!*] 1943 issued by the Ministry of the Interior will remain in force until the EGELI has taken possession of the property or businesses involved on the basis of ordinances that will be issued in compliance with art.8 of the law concerned.”⁴⁶ On 20 April the Ministry then issued an explicit order to the Heads of Province to take such measures by 25 May.⁴⁷ However, in various cases this either did not happen or else happened after significant delay (**2.a.4.1**).

2.a.2.4 Taking up a proposal made by the Ministry of Communication, on 23 December 1943 the Ministry of the Interior invited all Heads of Province to appoint “La Provvida”, the State Railways Special Office for the Management of Food Supplies, to administer all the **textile or food companies** confiscated from the Jews or else requisitioned for other reasons. This, it was said, would guarantee distribution “at fair prices and with particular consideration of the more needy: the victims of bombing raids, those who have been evacuated, or employees transferred away from home to North Italy.”⁴⁸ In at least three provinces the transfer of administration had still not occurred by the end of February 1944 – and there seems to be no reason to suppose it was

⁴² ACS, MI, DGPS, div. AAGRR, cat. A5G II g. m., b. 437, fasc. 230, sfasc. III, Chief of Police to Heads of Province, 28 January 1944; quoted in M. Sarfatti, *Documenti della legislazione antiebraica. Le circolari*, in *La rassegna mensile di Israel*, LIV, n. 1-2, January-August 1988, p. 197.

⁴³ ACS, MI, DGPS, div. AAGRR, cat. A5G II g. m., b. 437, fasc. 230, sfasc. III, Chief of Police to Provincial Police Chiefs, 5 February 1944.

⁴⁴ *Gazzetta Ufficiale d'Italia*, 16 March 1944, announcements page, p. 992.

⁴⁵ *Gazzetta Ufficiale d'Italia*, 12 June 1944, p. 873.

⁴⁶ Printed circular n. 4032/B from the Ministry of Finance (Head Office for Personnel and General Affairs), signed by the minister himself and sent to Heads of Province, heads of local revenue offices and others; dated 12 February 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

⁴⁷ ASAg, *Prefettura*, fasc. “Requisizione dei beni degli ebrei. Disposizioni di massima”, Ministry of Finance to Heads of Province, 20 April 1944.

⁴⁸ Telegram n. 98 from the Minister of the Interior to Heads of Province, 23 December 1943. Conserved in the various *Prefettura* collections of material in local State Archives.

thereafter.⁴⁹ However, from the very beginning it had taken place in Verona (the city where “La Provvida” had its head offices).⁵⁰

What is more, various Heads of Province, would – on the basis of what was envisaged by the war law – take immediate measures to liquidate precisely these kinds of companies and businesses (the Head of Province in Grosseto issued the relevant order on 30 December 1943).⁵¹

2.a.2.5 In Siena and Grosseto, at least, the Head of Province would transfer the **sequestered agricultural concerns** owned by Jews to the control of the local Union of Agricultural Workers.⁵²

On 6 December 1943 the Confederation of Agricultural Workers would call upon the provincial branch offices to see to it that in the agricultural concerns that had once been owned by Jews or other enemy nationals – as well as in those confiscated because badly run and part of large landed estates – there was full implementation of the new ‘social-ownership’ policy established by the recent assembly of Verona (see **2.a.3.10**).⁵³

2.a.2.6 On 21 January 1944, the Ministry for the Corporative Economy informed Heads of Province that it would be “opportune” if, after the sequestrations, the “sale of both unfinished and finished **pelts**” was handled by “bodies or organisations set up and controlled by the trade union organisations.”⁵⁴

2.a.2.7 On 22 May 1944, the Association of the Victims of Bombing Raids requested the Heads of Province to indicate - “particularly amongst the sequestered property owned by Jews” - the existence of buildings that might serve as convalescence centres.⁵⁵

2.a.3.1 On 4 January 1944 came dlg 2/1944, with “New Directives regarding the Property owned by citizens of Jewish Race.” With regard to what had been communicated in November (**2.a.1.3**) and then officially announced on the 30th of that month (**2.a.2.1**), it should be observed that the dlg 2/1944 provided for the official “confiscation” of such property. On 16 December 1943 the Council of Ministers had suspended discussion of two measures proposed by the Minister for Corporative Economy regarding the EGELI and the commercial and industrial concerns owned by Jews, both of which had hinged on “sequestration” (similar to **2.a.1.5**).⁵⁶ Thus the dlg 2/1944 was the product of a complex process of gestation, in which the President and offices of the EGELI had “played an active role.”⁵⁷

Published in the *Gazzetta Ufficiale d’Italia* of the 10 January, the law officially came into force on that date (even if the *Gazzetta* – or, at least, the text of the law – was not circulated until the end of the month).

It covered the assets of all individuals who were classified as “of Jewish race” by the rdl 1728/1938, be they Italian or foreign, resident or non-resident in the RSI, and regardless of whether they enjoyed “discriminatory” exemption. Such people could not possess within the territories of the RSI “businesses of whatever nature [...] land [...] buildings[...] shares, stocks, credits or any types of business shares [...] or chattels of any nature” (art. 1), with no exceptions being made for the value or character of the “property” in question.

⁴⁹ ASAq, *Prefettura*, fasc. “Requisizione dei beni degli ebrei”, Acting Director of the “La Provvida” Head Office to the Head of Province in Aquila, 29 February 1944, and other documents; AdS Ferrara, *Prefettura*, el. 24, b. 3, fasc. “Sequestro beni ebraici”, Acting Director of the “La Provvida” Head Office to Head of Province in Ferrara, 29 February 1944, and other documents; ACS, *MI, DGPS, div. AAGRR*, cat. A5G II g.m., b. 437, fasc. 230, sfasc. III, Head of Province in Vercelli to Ministry of the Interior, 25 February 1944.

⁵⁰ ASVr, *Prefettura*, b. “Beni ebraici”, fasc. “Aziende commerciali”, Office for the Identification and Administration of Jewish Property to the EGELI, 11 August 1944.

⁵¹ ASGr, *Prefettura*, b. 698, order by the Head of Province in Grosseto n. Gab.9, 30 December 1943.

⁵² ASSi, *Prefettura, Gabinetto*, b. 295, fasc. 2, various documents; ASGr, *Prefettura*, b. 698, order by the Head of Province in Grosseto n. 3833, 16 November 1943.

⁵³ ASGe, *RSI, Prefettura*, b. 35, fasc. 10, Confederation of Agricultural Workers to secretaries of the Provincial Unions and others, 6 December 1943.

⁵⁴ ASBg, *Camera di commercio*, cat. XXIII, b. 913, fasc. 130, circular n. 72 from Ministry of Corporative Economy to Heads of Province, 21 January 1944.

⁵⁵ ASTo, *Prefettura di Vercelli*, b. “Beni ebraici. Massime”, fasc. 1.16.23/E/1, National Association of the Families of Wounded and Deceased Servicemen and Civilian Victims of Enemy Bombing Raids to the Head of Province in Vercelli, 22 May 1944.

⁵⁶ ACS, *RSI, PCM*, 1943-45, b. 138, fasc. 8, “Consiglio dei ministri. Riunione del 16 dicembre 1943”.

⁵⁷ ACS, *Egeli*, b. 8, minutes of the board meeting of the EGELI on 27 November 1944.

The dlq 2/1944 also declared null and void all transfers of ownership that had taken place after 30 November 1943, and envisaged the possibility of doing the same for those which had taken place before and were considered to be “bogus”, with particular – but not exclusive – reference to the gifts of real estate that came under art. 6 of rdl 126/1939. Subsequently, it was added that scrutiny would also be extended to the gifts of non-public companies that came under art. 55 of rdl 126/1939, and that “there should be a review of *all* such gifts and donations in order to establish as valid only those that resulted in the *real and definitive* passage of possession from the Jew ceding them.”⁵⁸

In practical terms, those who owed debts to Jews or else held “assets of whatever kind” belonging to them had to declare the fact to the Head of Province within thirty days of the law coming into force (art. 2; the deadline – 9 February – was subsequently extended to the 29th of the month). The Head of Province would issue an order confiscating the property for the State and transferring guardianship, administration and sale thereof to the EGELI, the body responsible for the management and liquidation of real-estate assets that had been set up in 1939. In its turn, the EGELI was authorised to delegate its duties to a land credit bank (**2.a.3.5**) (art. 7, 11-13). The EGELI, or the bank to which it delegated, were responsible for requesting the “immediate release” of the property (art. 8).

The law laid down that the sums realised in such sales were to be “paid to the State as partial cover for the costs of assistance, subsidies and compensation provided to those who had suffered as a result of enemy air raids” (art. 15); the text of the order issued on 30 November 1943 had, on the other hand, seemed to imply that such sums would be paid to the “indigent victims of disaster,” either directly or via the local authorities (**2.a.2.1**).

Severe penalties were laid down for those who failed to report in compliance with art. 2 (art.16: up to three months’ imprisonment and a fine of up to L. 30,000) and for those who “played a direct role in the concealment, suppression, destruction, dispersal, damage or exportation beyond the territories of the State of things belonging to persons ‘of Jewish race’” (art. 17: up to one year’s imprisonment – or six months “if the crime is committed by the owner” – and a fine of from L. 3,000 to L. 30,000).⁵⁹

Many articles in the dlq covered and repeated what had been laid down in the war law (rdl 1415/1938) regarding enemy property; however, the new law increased the fines tenfold and added certain changes required by the fact that enemy property had previously been subject to sequestration and not confiscation. For example, articles 2 and 6 of the new law were based on articles 309 and 312 of rdl 1415/1938 and on article 1 of rdl 1994/1940, whilst articles 16 and 17 were based on articles 347 and 348 of rdl 1415/1938.

On 26 January the Director of the Association of Banks sent a text of the new law to the director of one of the major members of the association, asking him to “make strictly confidential use thereof”, as “the *Gazzetta Ufficiale* of the 7 January [sic!] does not yet seem to have been published.”⁶⁰ On 27 January the Minister of Finance telegraphed the Heads of Province to inform them of the existence of the measure, of the delay in circulating the *Gazzetta* and the extension to 29 February of the deadline for reporting any debts owed to or possession of assets owned by Jews.⁶¹ On 29 January the Stefani Press Agency sent out a dispatch containing ample extracts from dlq 2/1944 (and mentioning the *Gazzetta*); the daily press gave news of it the following day.⁶² A few days later, the Minister of Finance sent Heads of Province, local revenue officers and others a long

⁵⁸ ASTo, *Prefettura di Vercelli*, b. “Beni ebraici. Massime”, fasc. s.n., Ministry of Finance [Head Office for Personnel and General Affairs] to Heads of Province and Heads of local revenue offices, 15 September 1944; italics in the original.

⁵⁹ Dlg 4 January 1944, n. 2, “Nuove disposizioni concernenti i beni posseduti dai cittadini di razza ebraica”.

⁶⁰ ASBCI, *SFI*, ex-64, fasc. 3, sfasc. 3, ins. 1, Director of the Fascist Confederation of Banks and Insurance Companies to the Head Office of the Banca Commerciale Italiana, 26 January 1944.

⁶¹ Telegraph circular n. 857/200973 from the Minister of Finance to Heads of Province, dated 27 January 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

⁶² ASAg, *Prefettura*, fasc. “Requisizione dei beni degli ebrei. Disposizioni di massima”, telegram n. 8/29 from the Stefani Press Agency, dated 29 January 1944. For the publication of the news in Roman newspapers, see *La BNL tra guerre coloniali e guerra mondiale. 1937-1945*, Giunti-BNL Edizioni, Florence 1999, p. 526.

printed circular (n.4032/B, of 12 February 1944) containing the text of the law and numerous clarifications.⁶³ The circular pointed out that the Italian legislation regarding the identification of those “belonging to the Jewish race” was also to be applied to nationals “of States who have not adopted racial measures.” Furthermore, it laid down procedures for the transmission to Heads of Province (sometimes *via* the local revenue officers) of all the data regarding property and assets that had already been gathered together in any public office or organisation as a result of the application of the order of 30 November 1943 (2.a.2.1) or the implementation of the norms governing real estate and businesses laid down by rdl 126/1939. Authorising the Heads of Province to supply public offices, banks and insurance companies with the lists of Jews, it also laid down that “stocks, deposits and valuables” confiscated in banks should remain “conserved” within the same under a special lien.

The circular pointed out that the confiscation also applied to the certificates which the EGELI had issued in previous years against the “excess” quota owned in real estate or businesses that “could not be conserved [by Jews].”

Finally, it prescribed certain regulations relating to the confiscation of specific objects (see 2.a.3.8). In the case of property possessed jointly by persons of “Jewish” and of “Aryan” race, the confiscation concerned only the shares held by the former. Given that where savings books were concerned, this division of shares was often not clearly indicated, the Ministry of Finance and the Fascist Confederation of Banks and Insurance Companies – in agreement with the Inspectorate for the Defence of Savings and the Provision of Credit – decided to consider the savings as belonging in equal measures to all those whose name figured on the account, unless the “Aryan” account-holder reported that the Jew’s share was higher than that presumed (where he/she declared that this share was lower, it was decided that “unless proof to the contrary exists in this latter case, to keep to the presumed shares”).⁶⁴

2.a.3.2 On 16 April 1945 the Council of Ministers approved the broad outline of a law which ratified the disbanding of Jewish communities laid down on 28 January 1944 (2.a.2.2), confiscating all their sequestered property and extending the measure to Jewish charitable and assistance organisations. Here, too, severe penalties were envisaged for all those who “played a direct role in the concealment, disguise, etc;”⁶⁵ the ultimate defeat of Fascism meant this law never came into effect.

In the meantime, on 11 October 1944, the Minister of the Interior had ordered that “all the archives confiscated from the Israelite communities, synagogues and even from individuals” were to be sent to the General Inspectorate for Race.⁶⁶

2.a.3.3 The dlgs 501/1944 of 29 June laid down “Supplementary Norms and Modifications regarding Registered Bonds and Shares”. Amongst other things, it required the holders of **registered shares** to declare to the limited company their “race”, with the company then being required to communicate this information to the General Register of Shares and Stocks.⁶⁷ It is probable that none of those subject to persecution actually complied with this requirement.

However, the identification - and confiscation - of the share certificates held by Jews might take place within their bank deposits or in their own homes. On the basis of dlgs 2/1944 (2.a.3.1), the limited companies themselves were already required to set in motion the procedure of confiscation by informing the Prefecture of shareholders who were deemed to be Jews. Given the difficulties raised by certain companies regarding the identification of these – there might be tens of thousands

⁶³ Printed circular n. 4032/B from Ministry of Finance (Head Office for Personnel and General Affairs), signed by the minister and addressed to Heads of Province, heads of local revenue offices and others, dated 12 February 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

⁶⁴ ASAg, *Prefettura*, fasc. “Requisizione dei beni degli ebrei”, circular n. 12/1653 from the Fascist Confederation of Banks and Insurance Companies, 7 February 1944.

⁶⁵ ACS, *RSI, PCM*, b. 150, fasc. 159, outline of the law regarding the dissolution of Jewish Communities; quoted in M. Sarfatti, *Documenti della legislazione antiebraica. I testi delle leggi cit.*, pp. 57-59.

⁶⁶ ASMi, *Prefettura di Varese, Gabinetto*, b. 4, fasc. “DGPS. Divisione polizia frontiera”, Minister of the Interior to Heads of Province, 11 October 1944.

⁶⁷ Dlg 501/1944 of 29 June 1944, “Norme integrative e modificative per la nominatività dei titoli azionari”.

of shareholders living in various different provinces, including those not controlled by the RSI; one company claimed that it had managed to get copies of the lists of Jews only from sixteen prefectures, etc. – the Ministry of Finance proposed first “urgent publication of a general list of the persons “of Jewish race” resident in Italy” (July 1944), and then “the confluence of the provincial lists regarding those belonging to the Jewish race into certain specific prefectures, which could be the following: Turin, Genoa, Milan, Verona” (December 1944). Both of these proposals were, however, rejected by the General Inspectorate for Race, which was constantly pointing out that the lists could only be published after “the new race laws” it had called for; and that it was the duty of the limited companies to send Prefectures lists of shareholders for scrutiny (August 1944 and March 1945).⁶⁸

In one case of an increase in a company’s stock capital through the granting of options to existing shareholders – a procedure that necessarily required them to declare their “race” (perhaps on the basis of dlgs 2/1944 (**2.a.3.1**) and not dlgs 501/1944) – we do know of a Jewish shareholder who did not take up his option. The company had decided the increase in stock capital on 9 November 1943, laying down that the options had to be taken up between 20 July and 4 August 1944; the forms to be completed by those taking up the options contained a declaration of “race.” (The matter was resolved after the war.)⁶⁹

2.a.3.4 On 1 April 1944, the Minister of Finance observed that the recently announced legislative decree on the confiscation of **works of art (2.a.1.5)** was already rendered obsolete by the dlgs 2/1944, concerning all property and its general confiscation. He therefore proposed to the President of the Council of Ministers and to the Ministry of Education that the publication of the new decree should be deferred, with the Heads of Province however being required “to stipulate [in their confiscation orders] that the works of art be entrusted to the guardianship of the Superintendents of Art Galleries.”⁷⁰ On 7 July 1944, the Minister of Education informed these latter that the dlgs 2/1944 had “made nugatory the publication of the legislative decree already announced” and called upon them to make a “rapid survey of the works of art confiscated and given over to the keeping of the bodies responsible for the administration of Jewish property.”⁷¹ On 5 September the Ministry of Finance informed the EGELI (which then informed the administrative bodies) that, following a proposal from the Ministry of Education, confiscated Jewish “real estate and chattels” whose artistic and historic value had already been “notified” to the Ministry of Education (in compliance with rdl 1089/1939 regarding the country’s artistic heritage) should in all cases be excluded from sales; and if a direct request came from the Ministry of Education, it should be handed over to this latter’s Department for the Arts.⁷²

2.a.3.5 The bodies delegated by the EGELI (see **2.a.3.1**) had changed slightly with respect to the period 1941-43, due to the shrinkage in the areas covered (these no longer included: the southern part or the islands of Italy; certain provinces of Central Italy; what had been Italian territory in the Balkans; the provinces in the Prealpine and Adriatic Coast ‘Operations Zones’) and to the fragmentation of responsibilities in Emilia and Lombardy. On the 13 September 1944, these bodies were: Credito Fondiario dell’Istituto San Paolo di Torino (Piedmont and Liguria); Credito Fondiario della Cassa di Risparmio delle Provincie Lombarde (Lombardy, except Mantua and Cremona); Banca Agricola Mantovana (Mantua); Banca Popolare di Cremona (for that province; but see **2.a.4.1**); Istituto di Credito Fondiario delle Venezie in Verona (Veneto, except Belluno); Cassa di Risparmio di Piacenza (for that province); Cassa di Risparmio di Parma (for that province); Cassa di Risparmio di Reggio Emilia (for that province); Cassa di Risparmio di Modena (for that province); Credito Fondiario della Cassa di Risparmio di Bologna and Monte di Bologna

⁶⁸ ACS, *MF, SBE*, b. 13, fasc. 28, various documents.

⁶⁹ ACDEC, *Fondo Umberto Secondo Sacerdote*, racc. 7/C, various documents.

⁷⁰ ACS, *RSI, PCM*, b. 67, fasc. 2823, sfasc. 1, Minister of Finance to Office of the President of the Council of Ministers and the Ministry of Education, 1 April 1944.

⁷¹ Circular n. 41 from Ministry of Education (Head Office for the Arts) to local superintendents, 7 July 1944. Conserved in the records of various *Soprintendenze ai Beni Artistici*.

⁷² ACS, *Egeli*, b. 20, the EGELI to institutions delegated as administrators, 12 September 1944.

(for the buildings and land of that province respectively); Cassa di Risparmio di Forlì (for that province); Istituto Federale di Credito Agrario per la provincia di Ferrara (for that province; but see **2.a.4.1**); Credito Fondiario del Monte dei Paschi di Siena (Tuscany).⁷³ For the province of Ravenna, where there were few Jews and therefore few acts of confiscation, no body was appointed to administer this property.⁷⁴ For the provinces of Lazio and Le Marche, Umbria and Abruzzo – where, in 1939, responsibility for such management had been delegated to the Istituto Italiana di Credito Fondiario and to the Credito Fondiario of the Banca Nazionale del Lavoro respectively – there is no record of the dlq 2/1944 resulting in new measures being taken.

2.a.3.6 The orders of confiscations were published in the *Gazzetta Ufficiale d'Italia*, listing all the property owned by the Jews: businesses, buildings, credits of various nature, valuables deposited in banks, furnishings, ornaments, kitchenware, bedding, clothes, toothbrushes, etc. (the second such group of “assets” was included in the publication of an order, on 18 April, regarding the Head Rabbi of Genoa, who had in the meantime been arrested (3 November 1943), deported to Auschwitz on the 6 December and killed upon his arrival there on the 11th of that month). However, towards the end of April 1944, the Minister of Education informed the Office of the President of the Council of Ministers that orders of confiscation which mentioned “two pairs of used stockings” or “one national flag, one bidet, one enema syringe” or “one badly worn woollen undershirt, three dirty pairs of underwear”, etc. were producing “negative comments.” On 25 June the Office of the President of the Council would lay down that these orders were to be published in a fortnightly supplement to the *Gazzetta*,⁷⁵ the first supplement was published on 6 September. In the meantime, the ministries involved had informed the Heads of Province that “a very detailed list of property [...] appears to be far from advisable” and that “the description of such objects is much too detailed and precise, to the extent of containing references to underwear, things that are of very little value or are strictly personal; the reference to these can cause – or is causing – comments which it would be better to avoid.”⁷⁶

2.a.3.7 On 28 March 1944 the Ministry of Finance asked local revenue offices and the EGELI to send in **monthly summaries** of the orders of confiscation, with real estate clearly distinguished from chattels, and clear indication of commercial or industrial business concerns.⁷⁷ On 26 April 1944 the EGELI asked the Ministry for a copy of the periodical reports from the local revenue offices.⁷⁸ And in May 1944 it would send a monthly “copy of the statistics regarding the Jewish property confiscated” to the General Inspectorate for Race.⁷⁹ The EGELI had recorded 3,238 orders of confiscation by 31 July 1944⁸⁰, and 5,375 by 27 November of that year⁸¹, with the total reaching 7,847 “up to April 1945”.⁸² These figures do not include the orders of sequestration, nor do they cover the Prealpine and Adriatic Coast Operation Zones. And, of course, they do not include those orders of confiscation of which the EGELI was not informed or which it did not record.

⁷³ *Ibid.*, b. 20, Ministry of Finance (Head Office for Direct Taxation) to heads of local revenue offices and others, 13 September 1944; and other documents.

⁷⁴ EGELI, “L’Egeli e la sua attività”, typewritten report, San Pellegrino, May 1945, p. 42. A copy is conserved in ACDEC, AG, 1AI, fasc. “Egeli”.

⁷⁵ ACS, *RSI, PCM*, Pratiche 1943-45, b. 67, fasc. 2823, note from the Minister of Education which arrived at the Office of the President of the Council of Ministers at a date before 6 May 1944; *ibid.* Undersecretary of State at the Office of the President of the Council of Ministers to the Ministry of Justice (Office for the Publication of Laws and Decrees), 25 June 1944.

⁷⁶ ASAg, *Prefettura*, nuovo versamento, b. “Confisca dei beni degli ebrei” 1st part, Ministry of Finance to Heads of Province, 21 April 1944; ASVr, *Prefettura*, b. “Beni ebraici”, Ministry of the Interior to Heads of Province, 13 May 1944, quoting a letter sent by the Ministry of Justice.

⁷⁷ Circular registered as 8105/B from Ministry of Finance (Head Office for Personnel and General Affairs) to heads of local revenue offices, the EGELI and Prefectures, dated 28 March 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

⁷⁸ ACS, *MF, SBE*, b. 13, fasc. 27, the EGELI to Ministry of Finance, 26 April 1944.

⁷⁹ ACS, *MF, SBE*, b. 14, fasc. 35, the EGELI to General Inspectorate for Race, 6 December 1944.

⁸⁰ ACS, *MF, SBE*, b. 11, fasc. s.n., the EGELI to Ministry of Finance, 2 August 1944.

⁸¹ ACS, *Egeli*, b. 8, minutes of the board meeting of the EGELI on 27 November 1944.

⁸² Egeli, “L’Egeli e la sua attività”, cit.

Of the 7,116 such orders in the provinces of North Italy of which the EGELI was informed by April 1945 (again, excluding the two Operation Zones), 2,794 concerned real estate and chattels (buildings, land, furnishings, clothes, personal effects, etc), 4,115 deposits held by third parties (almost always banks) and 207 businesses (industrial and commercial, or else merchandise and stock of various kinds).⁸³

2.a.3.8 The dlgs 2/1944 laid down the confiscation of “all” property and assets. The circular regarding its application which was sent out by the Minister of Finance on 12 February 1944 (**2.a.3.1**) had this to say on **property of little value and personal effects**: “Given that the property to be confiscated includes clothes, underwear, bedding and also perishable goods, often in small quantities or of modest value (the storage and preservation of which would be of a cost out of proportion to their value), the EGELI is authorised to sell off such goods and objects on the best possible terms. It is the EGELI itself which is to judge which property it is not worth retaining; however, the Head of Province may also authorise the owners to keep it. If it proves difficult to sell off this property, the EGELI will hand over all the objects and merchandise, which it would be too onerous to conserve, to the local body responsible for social assistance.”⁸⁴ A circular of 3 May from the same minister confirmed the above, specifying that the property destined for such assistance agencies (there was explicit inclusion of “personal effects”, household effects and, “provisions of food”, but explicit exclusion of company merchandise and the furnishings of rentable apartments) must be formally acquired by the Prefecture on the basis of a genuine estimate of its value; the price paid should be included in the order relating to the confiscation. However, the Heads of Province were authorised to hand over to the assistance and charity agencies, “used objects” and “provisions of food.”⁸⁵

In August 1944, the Head of Province in Vicenza was authorised by the Ministry of Finance to hand over to the local assistance agency (free of charge) clothing, kitchenware and suitcases that had been confiscated from Jews who had in the meantime disappeared.⁸⁶ The only documented cases of objects being left in the possession of Jews regard either those who were already interned and sentenced deportation or those married to “Aryans”, hospitalised or over seventy years of age.

2.a.3.9 The sequestration order of 30 November 1943 covered “all property” of Jews (2.a.2.1), whilst the dlgs 2/1944 specified that confiscation also concerned “credits” (2.a.3.1.); both terms covered pensions. On 13 January 1944 the Treasury Head Office asked the State Accounting Department if the order of 30 November also covered pensions; on 30 January, the Accountant General sent the Minister of Finance a memo in which – on the basis of the dlgs 2/1944 – the answer was negative, given that pensions paid by the State or other public or parastatal bodies “were a sustenance payment rather than an income drawn upon property and wealth.” After the Minister of Finance had come out against this view, on 6 February the Accountant General responded by informing the Treasury Head Office to “suspend the payment of pensions assigned to persons of Jewish race”; the latter would send out a circular to this effect signed by the Minister on 26 February 1944.⁸⁷ Then, on 30 March, the Minister of Finance enquired of the General Inspectorate for Race and Demography – which, it would seem, was about to be set up as an organ of the Office of the President of the Council of Ministers⁸⁸ – whether the Heads of Province might not be required to decide questions relating to the payment of pensions (or release of parts of bank

⁸³ ACS, *Egeli*, b. 11, fasc. “Bilanci. Esercizio 1945, Relazione del commissario straordinario ai bilanci dell’esercizio 1945”.

⁸⁴ Printed circular n. 4032/B from Ministry of Finance (Head Office for Personnel and General Affairs), signed by the Minister of Finance and addressed to Heads of Province, heads of local revenue offices and others; dated 12 February 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

⁸⁵ Printed circular n. 42 (registered as 9953/B) from Ministry of Finance (Head Office for Personnel and General Affairs), signed by Minister of Finance and addressed to Heads of Province, heads of local revenue offices and the EGELI, dated 3 May 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

⁸⁶ ACS, *MF, SBE*, b. 13, fasc. 6, Minister of Finance to the Prefecture in Vicenza, 10 August 1944 (carbon copy).

⁸⁷ ACS, *MF, SBE*, b. 14, fasc. 48, memo for His Excellency the Paymaster-General, 31 January 1944, with annotations written by the recipient, and other documents; ASAQ, *Prefettura*, fasc. “Requisizione dei beni degli ebrei. Disposizioni di massima”, circular from the Ministry of Finance (Treasury Head Office), signed by Minister of Finance, addressed to heads of local revenue offices, prefectures and others; dated 26 February 1944.

⁸⁸ M. Sarfatti, *Gli ebrei* cit., p. 251.

deposits) to Jews. On 5 May the newly-instituted General Inspectorate for Race answered affirmatively.⁸⁹ Hence, in the circular sent out on 13 May 1944, the Minister of Finance allowed the Heads of Provinces to “authorise the resumption of payment to the entitled Jews or their relatives [...] of all or part” of monthly pensions and allowances, “of a modest monthly quota” from bank and post office deposits and of compensation received upon dismissal. This was “provisional” and depended upon the “presentation of a fully-documented request from those concerned;” the decision was to be based “solely on a consideration of the need for sustenance” and come “after a close examination of individual circumstances.”⁹⁰ On 15 May a circular from the same General Inspectorate for Race (which was then communicated to Heads of Province by the Minister of the Interior on 19 May) covered the same issue, pointing out the “advisability [...] of excluding from confiscations, sums, valuables and all those things that are, in general, indispensable for life”, including pensions and allowances “strictly of a sustenance” nature, as well as “case by case and after prudent evaluation [...] some part of chattels.”⁹¹ With regard to the question as to who had the authority to decide such “concessions” – and the distinction between a general exclusion from confiscations and the suspension, in some cases, of the effects thereof – a lively debate arose between the Inspectorate and the Ministry of Finance. This resulted in a letter (9 October 1944) from the Undersecretary at the Office of the President of the Council of Ministers calling upon the Inspectorate to always make “prior agreements” with the Ministry of Finance, bearing in mind that the Office of the President of the Council of Ministers “was of the opinion that, case by case, one can come to some arrangement.”⁹² The issue was apparently closed on 27 December 1944, when the Ministry pointed out that, as the Inspectorate circular was “later” than that issued by the Ministry of Finance, “this latter is to be considered as obsolete.”⁹³

In Venice and Siena, at least, one sees the Heads of Province using the Inspectorate circular to order - on 29 May and 14 June respectively - the local revenue offices to resume payments of all State pensions (the Head of Province in Venice also makes reference to the directives from the Ministry of Finance, though actually only applies the later circular).⁹⁴ In Bologna, Genoa, Perugia, Rovigo and Varese, the Heads of Province would in some cases apply the directives from the Ministry of Finance (in Genoa, the Head of Province gave the following motivation for his decision: “the authorisation has been conceded in view of the sustenance character of the pension, as the person entitled does not appear to be the owner of any other property of whatever nature, and is furthermore married to an Aryan woman.”).⁹⁵

The documents discussed above relate solely to the payment of pensions by the RSI and contain no direct or indirect reference as to whether the persons concerned had already been arrested (by the RSI itself or by the Third Reich) and sent to Auschwitz, or whether they were in hiding and/or trying to cover over the public registry information which identified them as Jews.

2.a.3.10 Agricultural business concerns continued to be a centre of attention from various quarters (see also **2.a.2.5**). On 31 March 1944, the Office of the President of the Council of

⁸⁹ ACS, *MF, SBE*, b. 13, fasc. 33; *ibid.*, *RSI, PCM, Pratiche 1943-45*, b. 67, fasc. 1032, Minister of Finance to Head Office for Demography and Race, 30 March 1944 (draft); *ibid.*, Inspector General for Race to the Ministry of Finance, 5 May 1944.

⁹⁰ Printed circular n. 47 (registered as 12948/B) from the Ministry of Finance (Head Office for Personnel and General Affairs), signed by the Minister of Finance and addressed to Heads of Province, heads of local revenue offices and the EGELI, dated 13 May 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

⁹¹ ACS, *MGG, RSI-Gabinetto*, b. 65, fasc. 135, sfasc. 5, Head of the General Inspectorate for Race to the Ministry of Justice, 30 May 1944; enclosed the Inspectorate circular “Beni appartenenti a persone di razza ebraica”, 15 May 1944. That circular was forwarded from the Ministry of the Interior to the Heads of Province on 19 May 1944 (ACS, *MI, DGPS, div. AAGGRR*, cat. A5G II g. m., b. 437, fasc. 230, sfasc. I); *Il Regime Fascista* published the text on 24 May.

⁹² ACS, *RSI, PCM, Pratiche 1943-45*, b. 67, fasc. 1032, Undersecretary at the Office of the President of the Council of Ministers to the General Inspectorate for Race, 9 October 1944 (carbon copy); and other documentation. Some references also in *ibid.*, b. 4, fasc. 3096, sfasc. 5; and in ACS, *MF, SBE*, b. 13, fasc. 33.

⁹³ ACS, *MF, SBE*, b. 14, fasc. 48, Ministry of Finance (Head Office for Personnel and General Affairs) to the Head of the Local Revenue Office in Verona, 27 December 1944 (carbon copy).

⁹⁴ *Ibid.*, b. 13, fasc. 33, Head of Local Revenue Office in Venice to the Ministry of Finance, 14 June 1944; enclosed is a copy of the order issued by the Head of Province in Venezia on 29 May 1944; *Gazzettino di Venezia*, 1° June 1944; ASSi, *Prefettura, Gabinetto*, b. 295, fasc. 6, Head of Province to Head of Local Revenue Office, 14 June 1944 (carbon copy).

⁹⁵ ACS, *MF, SBE*, b. 14, fasc. 48, various documents.

Ministers enquired of Heads of Province regarding the number and surface area of those belonging “to Jews or to other traitors.”⁹⁶ On 16 March the Prefecture in Venice received from that Office a telegram circular which gave the Ministry of Agriculture and Forestry the final say in deciding the names of those whose agricultural concerns were to be sequestered, without however making specific reference as to whether these were Jews and/or others.⁹⁷ And on 5 April that very minister would repeat the principle to the Heads of Province.⁹⁸ However, the EGELI, the Ministry of Finance and the General Inspectorate for Race rejected that this ruling might be applied to the agricultural concerns owned by Jews (which were now being confiscated and no longer merely sequestered).⁹⁹

On 14 May 1944, the Office of the President of the Council of Ministers called upon the Heads of Province to facilitate the enquiry being carried out by the *Opera Nazionale Combattenti* [a servicemen’s organisation] with regard to the “possibility of providing housing and shelter for rural families, refugees and the evacuated” in the farms and agricultural concerns confiscated from Jews.¹⁰⁰ At the same time, the *Opera* proposed a modification to the dlg 2/1944 so that it would be authorised to manage and then purchase said businesses; in January 1945, this legislative proposal was still under discussion between the Office of the President of the Council of Ministers and the Ministry of Finance.¹⁰¹ On 23 May 1944 the Fascist National Social Security Institution put itself forward to acquire the confiscated “rural properties”, which were to be used in producing food for its TB hospitals, remarking that “owned by us, the former property of Jews will become, in effect, the property of Italian workers.”¹⁰² On 17 March 1945, the first meeting was held of a Subcommittee for the Detailed Study of the Social Use of Agricultural Businesses and Concerns (it was under the Committee for the Study of the Application of the Law regarding the Social Use of Jewish Businesses, of which no details are known); the participants included representatives from the Ministry of Labour, the Ministry of Agriculture, of the *Confederazione Unica*, the *Alleanza Cooperative* and the EGELI.¹⁰³

2.a.3.11 Of the 7,847 orders of confiscation that were registered by the EGELI (see **2.a.3.7**), 220 concerned **businesses**.¹⁰⁴ The figure is sizeably lower than for the businesses within category c that were identified in 1939 as belonging to Italian Jews not enjoying “discriminatory” exemption (around 1,000 in northern Italy, excluding the two Operations Zones set up in 1943, and around 500 in Tuscany and Le Marche, where most such businesses were sequestered without also being confiscated).¹⁰⁵ The main reasons for this lower figure seem to be the following: the numerous businesses ceded or closed in the period 1939-1943 as a result of persecution; the fact that various types of business did not have confiscable property; the pointlessness of issuing confiscation orders for shops and warehouses that had already been emptied (either by their owners or by thieves); the fact that Heads of Province had already carried out the liquidation of the businesses sequestered on the basis of the order of 30 November 1943 (**2.a.2.4**).

The EGELI took effective possession of these businesses in 92 cases.¹⁰⁶ After the sales which it itself¹⁰⁷ decided (“of total property whose estimated value was 4 million [but] which raised almost

⁹⁶ Telegram n. 500/90 from Undersecretary of State at the Office of the President of the Council of Ministers to Heads of Province, 31 March 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

⁹⁷ ACS, *MF, SBE*, b. 13, fasc.7, the EGELI to the Ministry of Finance, 9 May 1944, with the transcription of a letter received from the Prefecture in Venice.

⁹⁸ ASVr, *Prefettura*, b. “Beni ebraici”, Minister of Agriculture and Forestry to Heads of Province and others, 5 April 1944.

⁹⁹ ACS, *MF, SBE*, b. 13, fasc.7, various documents.

¹⁰⁰ Telegram n. 500/119 from Undersecretary of State at the Office of the President of the Council of Ministers to Heads of Province, 14 May 1944. Conserved in the various *Prefettura* collections of material in local State Archives.

¹⁰¹ ACS, *MF, SBE*, b. 13, fasc.7, various documents.

¹⁰² *Ibid.*, b. 14, fasc. 61, National Fascist Institute for Social Security to the EGELI, 23 May 1944 (copy).

¹⁰³ *Ibid.*, fasc. 56, the EGELI to Ministry of Finance, 26 March 1945.

¹⁰⁴ EGELI, “L’ Egele e la sua attività” cit., p. 56.

¹⁰⁵ See the chapter “Persecutory Statutes regarding Jewish Assets and Work Rights, 1938-1943”.

¹⁰⁶ EGELI, “L’ Egele e la sua attività” cit., p.56.

¹⁰⁷ ACS, *Egeli*, b. 8, minutes of the EGELI board meeting on 27 November 1944.

double that figure”¹⁰⁸) and the sales decided by others before it took over responsibility for these assets (this happened, for example, at Mantua, where the Head of Province had obtained from the Ministry of Finance authorisation to “make promptly available to consumers” the merchandise found in hardware and textile shops¹⁰⁹), the EGELI would maintain effective control of 22 businesses.¹¹⁰ For these, projects of social ownership were evaluated, consisting either in the cession of the business to employees or in the employees taking a share in management and profits. However, no substantial changes of this kind were actually introduced.¹¹¹

The businesses run by the EGELI ranged from the Vita Mayer paperworks in Varese (with about one thousand employees) to various pharmacies.¹¹²

2.a.3.12 As far as confiscated **buildings and real estate** were concerned, these were not sold off by the RSI. On 7 March 1945, the EGELI wrote to the San Paolo di Torino Bank that “the Ministry of Finance does not consider it advisable – except in exceptional cases – to proceed to the sale of Jewish real estate.”¹¹³ And after the war, the EGELI would report “from the end of 1943 to April 1945 there were, therefore, no variations in the complex of property assigned to the EGELI on the basis of rdl 126/1939, apart from the sale of one building in Venice [...] So the EGELI’s administration of such Jewish property was predicated on the greatest concern to conserve it intact, and no sales were made.”¹¹⁴

2.a.3.13 With regard to the confiscated **bank deposits, State bonds, shares and credits extended to third parties**, the EGELI would in a post-war report write that it had authorised only “the partial sale of shares [...] deposited as guarantee for credit, in order to cover any debts”, and “small withdrawals” from bank deposits “to pay tax arrears.”¹¹⁵

2.a.3.14 The **deposits in banks** were left in the guardianship of these latter, even after confiscation (**2.a.3.1**). On 15 June 1944, the Chief of Police urged the Heads of Province in Tuscany (with the exception of those in Grosseto and Arezzo) to complete the sequestration and confiscation of the property of Jews and transfer “valuables, deposits and bonds in the banks to institutions in North Italy.”¹¹⁶

On 23 June – that is, when the advancing Allies had already liberated Grosseto and Perugia and were drawing near Macerata – the Minister of Finance telegraphed to Heads of Province that they should order banks to transfer northwards, with the “greatest urgency [...] bonds, money and valuables” confiscated from Jews. The deposits in the Veneto (with the exception of Belluno), in Ferrara, Ravenna and Pesaro were to be transferred to Verona; those in Lombardy, Emilia Romagna (with the exception of the two above-mentioned provinces), Tuscany (with the exception of Grosseto) and Ancona were to be transferred to Milan; those in Piedmont and Liguria to Turin. The banks had to send them to their own branches in these places (if there was one), otherwise to a corresponding bank or to one delegated by the EGELI (in Verona, the Istituto di Credito Fondiario delle Venezia; in Lombardy, the Cassa di Risparmio delle Province Lombarde; in Turin, the Credito Fondiario dell’Istituto San Paolo di Torino).¹¹⁷ On 11 July 1944 the Ministry of Finance telegraphed the Heads of Province (all those mentioned above, with the exception of those in Ancona, Arezzo, Siena and Livorno – places which had been, or were believed about to be, liberated) that the transfer concerned “all sequestered valuables or those which had been frozen, as

¹⁰⁸ EGELI, “L’Egeli e la sua attività” cit., p.57.

¹⁰⁹ ACS, MF, SBE, b. 14, fasc. 61, Head of Province in Mantua to the Ministry of Finance, 11 February 1944, and subsequent correspondence; EGELI, “L’Egeli e la sua attività” cit., p.58.

¹¹⁰ Ibidem.

¹¹¹ Ibidem.

¹¹² Ibid., p. 58.

¹¹³ ASSP, Egeli, s. D, 188D, the EGELI to the *Credito fondiario* [land bank] of the Istituto San Paolo, 7 March 1945; cit. in F. Levi, *I sequestri* cit., p. 66.

¹¹⁴ EGELI, “L’Egeli e la sua attività” cit., pp. 49, 52, (italics in the original).

¹¹⁵ Ibid., pp. 54-55.

¹¹⁶ ACS, MI, DGPS, div. AAGRR, cat. A5G II g.m., b. 437, fasc. 230, sfasc. III, Chief of Police to the Heads of Province in Florence, Siena, Lucca, Pistoia, Pisa, Livorno, Apuania, 15 June 1944.

¹¹⁷ ACS, MF, SBE, b. 13, fasc. 16, carbon copies of the various telegrams from the Minister of Finance to Heads of Province, 23 June 1944.

long as they met all the requisites for being subjected to regular confiscation.”¹¹⁸ On 9 April 1945 the EGELI pointed out that “many banks have not complied with the ministry’s directive, or have done so only partially (transferring bonds but not the deposits in current and savings accounts).”¹¹⁹ As a result, on 20 April 1945, the Minister of Finance telegraphed Heads of Province that they should “personally control the due application of said circulars, taking the most energetic measures to eliminate resistance or unjustified delays.”¹²⁰

Between July and October 1944, the Banca Commerciale Italiana transferred to its branches in Turin, Milan and Verona deposits from its branches in Novara, Genoa, Sanremo, Varese, Brescia, Mantua, Pavia, Piacenza, Modena, Bologna, Padua and Vicenza; deposits from its Venice branch were transferred to the delegated bank in Verona.¹²¹ The Banco di Roma transferred to its branches in Milan and Verona deposits from its Piacenza, Bologna, Padua and Venice branches.¹²²

2.a.4.1 In various cases, the application of the orders regarding “sequestration” and “confiscation” – as well as the handling/administration of the sequestered property – gave rise to irregularities and illegalities (with respect to the law of the RSI itself). Of these, both local and central State authorities were guilty. The following gives summary accounts of just a few examples.

With regard to illegalities (with respect to the law of the RSI), there are some episodes that were the direct responsibility of the Minister of the Interior and his immediate subordinates. At Como, for example, there were various cases of jewellery and valuables being seized from the Jews arrested either in the province or on the Italo-Swiss border and then handed over to the Head of Province. Subject to a formal order of confiscation, this property was, on 6 June 1944, handed over not to the EGELI or another delegated institution but (gathered together in 23 packets) to the Head Office of Public Security located in Valdagno.¹²³ In March 1944, some agents of public security “seconded from the Ministry of the Interior at Maderno” – that is, the Ministry’s head office – would withdraw from the warehouses of a Jewish company in the area of Novara “significant quantities of fabrics and clothes to the value of several million lire.”¹²⁴ On 1 December 1943, at a warehouse of a Jewish company in Maderno, the Carabinieri sequestered 26,846 pairs of stockings and 1,900 pairs of gloves (for men, women and children), to the value of around one million lire “subsequently [the Prefectural Commissioner of the town reported to the Head of Province in Brescia] by order of his Excellency the Minister of the Interior, the sequestered merchandise was handed over to the Special Office of Public Security, which answers directly to the ministry; upon payment, this Special Office distributed the stockings to the Republican Fascist Party, the staff of the Ministry of the Interior and, mainly, to the population.” When the Head of Province asked the Ministry to “be kind enough to rapidly forward the money raised from that sale” so that it could be confiscated, the Minister of the Interior in person replied (22 April 1944) that the “sum” (which was never given in figures) had been “upon higher orders, destined to the families of those who had died as a result of political assassination attacks” (for what it is worth, such a category was never mentioned in the order of 30 November (**2.a.2.1**), in the dlg 2/1944 (**2.a.3.1**) or in the various other norms and laws of the RSI of which he was a minister).¹²⁵

¹¹⁸ *Ibid.*, carbon copies of the various telegrams from the Minister of Finance to Heads of Province, 11 July 1944.

¹¹⁹ *Ibid.*, President of the EGELI to Ministry of Finance, 9 April 1945.

¹²⁰ *Ibid.*, carbon copy of telegram from the Minister of Finance to Heads of Province, 20 April 1945.

¹²¹ ASBCI, *SFI*, ex-57, Risarcimenti danni di guerra ad ebrei, cart. 2, fasc. 1, summary “Trasferimento di attività di pertinenza di nominativi di razza ebraica in seguito ai noti provvedimenti di concentrazione”, undated.

¹²² See the chapter “Banca di Roma”.

¹²³ ACS, *MI*, *DGPS*, *div. AAGRR*, cat. A5G II g.m., b. 437, fasc. 230, sfasc. I, Head of Province in Como to the Minister’s Office at the Ministry of the Interior, 9 November 1943 (for the valuables taken from the two people arrested on 23 October); ASCo, *Questura*, documentation sent to the Commission, fasc. “Morpurgo Oscar”, report to the Police Headquarters in Como of 22 May 1945; EGELI, “L’Egeli e la sua attività” cit., pp. 39-41; see also the chapter “Cassa di Risparmio delle Provincie Lombarde”.

¹²⁴ Ministry of the Interior (Department of Public Security), b. s.n., fasc. “Ditta Salco”, Prefect of Milan to the Ministry of the Interior, 3 October 1946.

¹²⁵ ASBs, *Prefettura*, *Gabinetto*, b. 158, fasc. “Menascé Vittorio”, Prefectural Commissioner in Toscolano Maderno to the Head of Province in Brescia, 14 February 1944; Head of Province in Brescia to the Ministry of the Interior (Minister’s Office), 11 April 1944 (draft); Minister of the Interior to Head of Province in Brescia, 22 April 1944; and other documents.

Towards the end of 1943, someone in Mantua informed either the police or the chief official of the Ministry of the Interior in the city of where various Jewish families had concealed their property before fleeing to Switzerland. On 14 July 1944, the informer would write to Mussolini himself to request a reward, which was granted in February 1945; the 25,000 lire were to be drawn upon the property that had in the meantime been confiscated. However, when man went on 9 March to withdraw this sum, he could not do so as he refused to signed the receipt requested: a letter that is stamped as having been received by the bank on “17 May 1945” but bears the handwritten date “10 April 1945” claims that that written in February of that year was “a mistake”, as “nothing is due to me [...] because I had nothing to do with this business.”¹²⁶ On 14 and 15 January 1944 the goods had meanwhile been seized and sequestered.¹²⁷ However, they were not handed over to the Mantua Authorities but transported in two articulated lorries to Maderno, where they were ultimately confiscated by order of the Head of Province in Brescia on 11 March 1944.¹²⁸ The list of confiscated property contained 322 entries (sometimes referring to single tablecloths or individual services of silverware, sometimes to collections of 106 pillowcases or to 18 bottles of olive oil) and took up three pages in the *Gazzetta Ufficiale*. The confiscation order made it clear that all this property – including a FIAT 500 car – was “located in Maderno, at the Special Police Office of the Ministry of the Interior.”¹²⁹ As was the usual practice, the silverware was evaluated after confiscation (total value was estimated at L. 452,665)¹³⁰; the remaining – around 200 – lots of property were evaluated on March 1944 (one day before the formal order of confiscation) by a committee “appointed by the Head of the Secretariat of his Excellency the Minister of the Interior” (at a total value of L. 118,870)¹³¹ and then “acquired by the Bureau of the Ministry of the Interior.”¹³² After the war, a report drawn up by an official in the Ministry of the Interior said that part of this latter group of property (total value: L. 40,065) had been re-sold by that Bureau to “various functionaries of the Minister’s Office and the police”, underlining that the Evaluation Committee had “been headed by the Bureau Chief of the day, engineer Costanzini, and made up of other trusted members of the Minister’s Office.”¹³³ For his part, the victim of all this pointed out that the part of the property acquired by the Bureau but not re-sold “had been replaced almost completely with old rags;” he also showed that the property taken from him had not all be listed in the confiscation order and that its valuation at L. 118,870 was anyhow “risible”.¹³⁴ Ultimately, in April 1946, the Prefect of Brescia would report that “what has emerged is the following: a) that numerous objects of great value were not included in the official inventory [...] in that, along with this [inventoried] property it has been proved (enclosed documents B, C, D and E) that a lot of other property was taken away by the team upon orders from Commissioner Mango; b) that the evaluation given of the inventoried objects was lower than the real value; c) that, as well as these missing objects, there had also been the substitution of valuable objects with things of minimal value.” He would conclude that the overall loss to the owner “might be evaluated at around L.

¹²⁶ ASMn, *Prefettura, Gabinetto*, b. 14, fasc. “PFR”, Italo Bandoni to Mussolini, 14 July 1944; AS Cariplo, *Egeli*, fasc. “Rimini Pirro”, the EGELI to Italo Bandoni, to the Ministry of Finance, to the Private Secretary of the Secretary of the Republican Fascist Party, to the Ministry of the Interior; extract from former Special Police Office in Maderno and to the Credito Fondiario della Cariplo, 23 February 1945; *ibid.*, typewritten note for internal use, beginning with the words “Oggi 9 marzo si è presentatio il rag. Bandoni per l’esazione” [Today, 9 March, Sig. Bandoni came to collect payment]; *ibid.*, Italo Bandoni to Cariplo, 10 April 1945, stamped by the bank with the arrival date of 17 May 1945.

¹²⁷ AS Cariplo, *Egeli*, fasc. “Rimini Pirro”, minutes of the “commission” appointed to assess part of the sequestered property, 10 March 1944.

¹²⁸ ACS, *MF, SBE*, fasc. “Rimini Pirro”, decree by the Head of Province in Brescia n. 1092, 11 March 1944.

¹²⁹ *Gazzetta Ufficiale d’Italia*, 8 May 1944.

¹³⁰ AS Cariplo, *Egeli*, fasc. “Rimini Pirro, verbale di presa in consegna dei beni già di [...] Rimini Pirro”, 15 May 1944.

¹³¹ *Ibid.*, minutes of the “commission” appointed to assess part of the sequestered property, 10 March 1944.

¹³² *Ibid.*, Record of the Receipt of the Property formerly belonging to (...) Rimini, Pirro, 15 May 1944.

¹³³ ASBs, *Prefettura, Gabinetto*, b. 158, fasc. “Rimini Pirro”, Commissioner-Superintendent from the Ministry of the Interior to the Ministry of the Interior (Minister’s Office), 10 December 1945 (copy).

¹³⁴ ACS, *MI, Gabinetto*, fasc. 18433, Pirro Rimini to the Head of the Minister’s Office at the Ministry of the Interior, 22 February 1946 (copy).

14,299,900”¹³⁵ (it is not clear if this includes the silverware and the formally confiscated sums that had in the meantime been restored to their owner).

In various cases, it was the Heads of Province themselves who were responsible for the irregularities, which were often veritably illegalities (with respect to the law of the RSI itself). In Verona in December 1943, a Recovery Office – or Race Office – was set up within the Federation of the Republican Fascist Party (hereafter PFR). This, as the PFR itself reported, carried out “various seizures and sequestrations of valuables and property belonging to persons of the Jewish race, a large part of which property has since disappeared without trace.”¹³⁶ At the beginning of 1944 the Head of Province in Verona set up a Committee to Identify Jewish Property (after the passing of the dlgs 2/1944, this became the Office for the Identification and Administration of Jewish property). As that Office would later report “the Committee received the archives of the Race Office which had been set up within the Federation of Republican Fascists and had, up to 15 February 1944, dealt with the various questions relating to Jews and their property. At the time of this transfer [of documents] there was no similar transfer of property held in consignment; nor was it possible to obtain a report on the work done and the results achieved.”¹³⁷

In Cremona the Head of Province would, in December 1943, appoint as official sequester and administrator of Jewish property a person suggested by a local fascist notable. In March 1944, this latter would suggest to the EGELI that it reconfirm this administrator for the application of the confiscations envisaged by the new dlgs 2/1944, given that he was “a person whose abilities offered full guarantees.”¹³⁸ The EGELI would then propose the Cassa di Risparmio delle Province Lombarde accept delegation as the administrator for such property in Cremona, using the above-mentioned person.¹³⁹ However, the bank did not accept such delegation, because of what its local manager referred to at the time as “particular local circumstances”¹⁴⁰ – that is, to quote a post-war report by the EGELI, the fact that “the administrator was practically forced upon them by the local authorities.”¹⁴¹ In December 1944 the EGELI would delegate the Banca Popolare di Cremona for this role.¹⁴² In a procedure that appears anomalous when compared to what happened in other provinces, this appointment was then approved in an order from the Head of Province, which included the statement: “The Banca Popolare di Cremona will set up a special office for the administration of confiscated Jewish property, which will be headed by the above-mentioned ... [that is, the person who had been appointed in December 1943].”¹⁴³

Florence saw the establishment of an Office for Jewish Affairs within the Prefecture in December 1943. This was under a Prefectural Commissioner who would, at the beginning of March 1944, be delegated by the Head of Province to “issue and sign measures and orders concerning the confiscation or the transfer of assets.”¹⁴⁴ According to a later memo from the EGELI, in March 1944 the Florence office had appraised the property owned by Jews as consisting of: 350 buildings, 102 agricultural concerns, bank deposits totalling thirteen million lire and other types of assets.¹⁴⁵ On 25 April the local revenue office informed the Ministry that it had received from the Prefecture official notification of five confiscation orders but that it had had information over the previous

¹³⁵ *Ibid.*, Prefect of Brescia to the Ministry of the Interior (Minister’s Office), 8 April 1946.

¹³⁶ ACDEC, *AG*, 13B, fasc. “Verona”, Federal Commissioner of the Republican Fascist Party (Federation of Verona) to the Police Chief and Head of Province in Verona, 6 April 1944 (copy).

¹³⁷ ASVr, *Prefettura*, b. “Beni ebraici”, Office for the Identification and Administration of Jewish Property to the Head of Province in Verona, 24 June 1944.

¹³⁸ AS Cariplo, *Egeli*, b. 46, fasc. 1, Roberto Farinacci to the EGELI, 22 March 1944 (copy, enclosed with EGELI to the Cassa di Risparmio delle Province Lombarde, 3 April 1944); see the chapter “Cassa di Risparmio delle Province Lombarde”.

¹³⁹ *Ibid.*, the EGELI to Cariplo, 3 April 1944.

¹⁴⁰ *Ibid.*, director of the Cremona branch to the Cariplo Head Office, 14 November 1944.

¹⁴¹ EGELI, “L’Egeli e la sua attività” cit. p. 37.

¹⁴² ACS, *MF*, *SBE*, b. 9, fasc. “Cremona”, the EGELI to the Ministry of Finance, 22 December 1944.

¹⁴³ ASCr, *Prefettura*, *Gabinetto*, b. s. n. with papers relating to Jewish property, fasc. 50; order issued by the Head of Province in Cremona n.4525, 12 December 1944.

¹⁴⁴ Order issued by the Head of Province in Florence, 5 March 1944, *Gazzetta Ufficiale d’Italia*, 10 May 1944.

¹⁴⁵ ACS, *MF*, *SBE*, b. 9, fasc. “Firenze”, EGELI, memo concerning the situation with regard to Jewish property in Florence, 28 June 1944; see the chapter on Florence.

months of around 200 sequestrations carried out in homes by the local Police and the Guardia Nazionale Repubblicana.¹⁴⁶ On 28 June, the EGELI informed the Ministry of Finance that, up to date, it had received only 23 confiscation orders against chattels and real estate and 12 confiscation orders relating to deposits held by third parties.¹⁴⁷ In the period 10-20 June 1944 – before the general order to transfer northwards, and before the specific order regarding the provinces of Tuscany (2.a.3.14) – the Office of Jewish Affairs and the Guardia Nazionale Repubblicana organised the transfer north of the property they administered (all of it simply sequestered, not confiscated). On 17 June 1944, a dozen crates containing valuables and the archive of the Office of Jewish Affairs were deposited at the Banca d'Italia in Milan;¹⁴⁸ at the beginning of September 1944 the General Inspectorate for Race at Desenzano held the sum of just over one million lire (almost all in cheques) and a small quantity of bonds and shares;¹⁴⁹ and, in autumn 1944, about thirty-five crates, containing the furnishings of the Florence synagogue and the property of Florentine Jews, were in Bergantino, near Rovigo, where a section of the Guardia Nazionale Repubblicana had its headquarters.¹⁵⁰

In June 1944 there had still be no decision in Ferrara with regard to which institution should administer Jewish property. At the end of the month the EGELI informed the Ministry of Finance that the local Cassa di Risparmio had proven unsuitable “and unacceptable to the local authorities also for political reasons” – reservations which did not apply to the Istituto Federale di Credito Agrario for the province of Ferrara.¹⁵¹ Three months later, the new Head of Province convinced the EGELI that it was better to abandon negotiations with this latter and take up those with the Cassa di Risparmio.¹⁵² In September, this latter bank seemed to have accepted being delegated by the EGELI, but then on 8 November 1944 it formally ruled out being able to do so. That same month it appeared that such administration might be carried out by a specially set up Office of Jewish Affairs in the Prefecture, as subsequently happened.¹⁵³ With regard to the accounts kept by this Office, on 1 September 1945 a figure appointed by the Prefect would write : “None of the above-mentioned registers has been kept with the care or with the guarantees required by law and the rules of accounting [...] Entries regarding incoming property have often been crossed out without any indication of the reasons for such erasure [...] There is reason to believe that a large quantity of the sums realised from the sale of property have not be recorded [...] Outgoings: the register of expenses would seem to be in order.”¹⁵⁴ Twice in 1944 – on 13 May and 9 September – the Head of Province withdrew sizeable sums from the Jewish deposits frozen in the city’s banks (6 million lire on the first occasion, 2.6 million on the second), which he required to pay “salaries, wages and supplies for the Republican National Guard” and also to meet unspecified “urgent and impelling” needs of the Republican Federation of Fascists.¹⁵⁵ In both cases, the amounts were returned after about a month; however, it is true that such withdrawals were totally unjustified by the regulations in force. Finally, the General Regulations and the ministerial directive regarding the transfer of all confiscated property northwards (2.a.3.14) were clearly contradicted when the Head of Province ordered the confiscation of the Jewish deposits in various banks and their transfer to the Cassa di Risparmio di Ferrara. These sums were to be held in an account made out to “the Head of Province

¹⁴⁶ *Ibid.*, Local Revenue Office in Florence to the Ministry of Finance, 25 April 1944.

¹⁴⁷ *Ibid.*, *Egeli*, memo concerning the situation with regard to Jewish property in Florence, 28 June 1944.

¹⁴⁸ AS Cariplo, *Egeli*, cart. 38, fasc. 3, various documents.

¹⁴⁹ *Ibidem.*

¹⁵⁰ ACS, *MF, SBE*, b. 13, fasc. 16, Head of the Minister’s Office at the Ministry of Finance to the High Command of the National Republican Guard, 20 November 1944.

¹⁵¹ *Ibid.*, b. 9, fasc. “Ferrara”, the EGELI to the Ministry of Finance, 20 June 1944.

¹⁵² *Ibid.*, the EGELI to the Ministry of Finance, 5 and 12 September 1944.

¹⁵³ *Ibid.*, the EGELI to the Head of Province in Ferrara and the Ministry of Finance, 29 November 1944.

¹⁵⁴ ACS, *MI, Gabinetto*, 1944-1945, b. 167, fasc. 15874, report to the Prefect of Ferrara, 1 September 1945 (copy).

¹⁵⁵ ASBCI, *SFI*, ex 64A, Correspondence with branch offices A-L, cart. 3, fasc. 15, the BCI in Ferrara to the BCI Head Office, 17 May 1944, and other documents; AS BCI, *SFI*, Branch Archives, Ferrara Branch, cart. 1, fasc. 2, Head of Local Revenue Office to the Ferrara BCI, 13 May 1944; Head of Province in Ferrara to Head of Local Revenue Office in Ferrara, same date (copy); order issued by the Head of Province in Ferrara n. 195/AE dated 9 September 1944.

in Ferrara, who was entitled to move the funds around as he saw fit on the basis of impelling necessities.”¹⁵⁶

2.a.5.1 In various places in the peninsula the **German police forces** carried out confiscations, sometimes by force but often with written orders that thus linked their actions with the norms regulating their presence in Italy. For example, there is documentation regarding the confiscations carried out between 8 and 19 July 1944 by the head of the Sipo-SD in Florence, who ordered money to be taken from the Jewish deposits held in various Florentine banks (at the very least: the Banca Commerciale Italiana, the Banco di Napoli, the Banco di Roma, Credito Italiano and Monte dei Paschi di Siena); he had these banks hand over the contents of safe-deposit boxes and cheques to the value of the balance in the current accounts.¹⁵⁷ Similar measures were taken at banks in Novara, Bologna and other cities within the Prealpine and Adriatic Coast Operation Zones.

Primo Levi would write that when the German police organised the departure of his convoy from Fossoli to Auschwitz in February 1944 “they had interpreters tell us that all the Jews were leaving for cold countries, hence it would be best to bring with one heavy clothing, blankets and furs – along, of course, with valuables, money and currency.”¹⁵⁸

2.B THE GERMAN NORMS AND REGULATIONS IN THE PREALPINE AND ADRIATIC COAST OPERATIONS ZONES.

The regulations introduced by the Germans in these two zones – the former comprising the provinces of Bolzano, Trento and Belluno; the latter the provinces of Trieste, Gorizia, Udine, Pola, Fiume and Lubiana – is described on the basis of the actual executive measures taken and of various reports. It emerges as substantially the same in both zones.

Unless otherwise indicated, the German documents quoted use the term *Beschlagnahme* which here is translated as ‘sequestration’, even if the seizure of property seems to have had the very final character of a ‘confiscation’.

2.b.1 The mechanism used in the seizure of property is described by the occupying forces themselves. In the Prealpine Operations Zone, following an order from the Supreme Commissioner (*oberster Kommissar*), Jewish property (*Juedisches Vermoegen*) was “sequestered by Department I-Commander of SS and Police and subsequently handed over to the relevant department III – Finance Section of the Central Office of the Supreme Commissariat – for the specific measures regarding treatment, administration and evaluation (*Behandlung, Verwaltung und Verwertung*)”.¹⁵⁹ In the Adriatic Coast Operations Zone, the order (*Anordnung*) issued on 14 October 1943 by the Supreme Commissar with regard to the “treatment of Jewish property” laid down: all the property and real estate of the Jews is to be placed under sequestration; the chief commanders of the SS and police in Trieste and Lubiana are appointed to see to the registering and safekeeping (*zu erfassan und sicherzustellen*) of the property in their respective territories, and to provide immediate information thereon to the Finance Section of the Supreme Commissariat, which is responsible for its temporary administration and final evaluation (*einstweilige Verwaltung und endgueltige Verwertung*). Any cession of Jewish property aimed at concealing it or exporting it (*Verschleierung oder Verschleppung*) was rendered null and void, and any attempt to save Jewish property from the application of this order was to be severely punished (*ist strengster Bestrafung zuzufuehren*).¹⁶⁰

¹⁵⁶ ASBCI, *SFI*, Branch Archives, Ferrara Branch, cart. 1, fasc. 2, orders issued by the Head of Province in Ferrara n. 596/AE and 600/AE, 7 November 1944; ACS, *MF, SBE*, b. 13, fasc. 25, the EGELI to the Ministry of Finance and Head of Province in Ferrara, 29 November 1944.

¹⁵⁷ ASBCI, *SFI*, ex 64A, Correspondence with branch offices, A-L, cart. 3, fasc. 16, various documents; *inc.*, ex 57, cart. 7, fasc. 3, sfasc.1, various documents; *ibid.*, ex 59, cart. 8, fasc. 2, sfasc. 1; ASMPS, *Egeli*, b. 15, fasc. “Disposizioni di legge, circolari. 1942-1952”, Florence branch of MPS to Head Office, 31 August 1944; see the chapter “Banca di Roma”.

¹⁵⁸ ACDEC, *Fondo Massimo Adolfo Vitale*, b. 4, fasc. s.n., hand-written account by Primo Levi, 5 December 1965.

¹⁵⁹ ASBI, *Prefettura, Gabinetto*, b. 380, fasc. “Applicazione di leggi e decreti nella zona di operazione delle Prealpi 1943-1944”, Oberster Kommissar Arbeitsbereich III-Finzen a Deutschen Verwaltungsberater [German Councillor for Administration] at the Prefecture of Belluno, 4 July 1944; see also the chapter: “Property seizure in the Prealpine Operations Zone: Bolzano, Trento and Belluno”.

¹⁶⁰ ASMAE, *RSI, Gabinetto*, b. 164, fasc. IV.1, sfasc. 6, Oberster Kommissar in der Operationszone Adriatisches Kuestenland, *Anordnung*, 14 October 1943 (copy).

The sequestration of Jewish property ordered in each zone by the commanding officer of the SS and police (*Hoeherer SS – und Polizeifuehrer*) was to be carried out therein by the head of the Sipo-SD (*Befehlshaber der Sipo-SD [Sicherheitspolizei-Sicherheitsdienst/ Security Police-Security Services]*). In the Adriatic Coast Operations Zone the sequestration of property (and perhaps accompanying arrest) were often carried out by a special squad – the *Einsatzkommando Reinhard* (Einsatzkommando R) – which had various bases: R I in Trieste, R II in Fiume, R III in Udine and (outside the Adriatic Coast Operations Zone) R IV in Mestre. This was a parallel police structure, which itself answered to the Commanding Officer of the SS and Police.¹⁶¹

On 7 October 1943, a German general passed to his subordinates the following order, which had come to him from the High Command of the SS and Police in the Adriatic Coast Operations Zone: the arrest of Jews and the seizure (*Vereinnahmung*) of their property of value (*Vermoegenswerte*) was the task exclusively of the Sipo-SD.¹⁶² With regard to the performance of the first of these two duties, one might point to the order for the arrest of “pure Jews” (*Volljuden*) issued for the province of Bolzano on 12 September 1943, which was implemented in Merano on 16 September 1943, and to the fact that the first rounding-up of the Jews in Trieste and Gorizia took place on 9 October and 23 November of that year respectively.

2.b.2 The regulations, the implementation thereof and the results of a year of property seizures in the province of Trieste are well summarised in the following account (here given in translation):

“Trieste, 26 February 1945. To the Supreme Commissar of the Adriatic Coast Operations Zone, Finance Department, Substitute Government Councillor, Dr. Zojer, Trieste.

Re: Assessment of the operations of the Sub-Department 4 of the Finance Department of the Supreme Commissariat with regard to the administration of Jewish property. Report by retired section head, Dr. Friedrich Moc.

“In compliance with the spoken orders of Substitute Government Councillor, Dr Zojer, received on 17, 19 and 20 February 1945, I have looked at the operations of Sub-Department 4 of the Finance Department of the Supreme Commissariat with regard to the administration of Jewish property.

“On this matter, I report the following:

“The above-mentioned [sub] department, comprising one director and 6 clerks (one a typist), is responsible for the evaluation and administration of all the Jewish property sequestered in the Adriatic Coast Zone and for the handling of such property. With regard to the Jewish property in the provinces outside Trieste, the Finance Department uses as intermediate agents the financial advisors to the individual German councillors, who are engaged in the evaluation and administration of the Jewish property that falls under their jurisdiction, in accordance with the directives issued by the Finance Department of the Supreme Commissariat.

“The legal bases for the sequestration of Jewish property in the Operations Zone are provided by the secret ordinance of the Supreme Commissioner of 14 October 1943. The decision with regard to sequestration is taken by the commanding officer of the SS and by the “R Squad” police. The Finance Department is informed of each sequestration with a notification that has the authority of a legal verdict and cannot be impugned; this is drawn up by the Head of the Security Police and the Security Services. The number of sequestrations of Jewish property at the time of the survey was 1,420. Notification of sequestrations is still arriving as individual Jews have continued to avoid sequestration, perhaps by disguising their ownership.

“Once the notification is sent, the work of the Finance Department begins. During the course of evaluation and subsequent administration, any Jewish property which arrives – together with new components of Jewish property that has already be subjected to seizure – is included in the sequestration by the Security Police.

¹⁶¹ A. Walzl, *Gli ebrei sotto la dominazione nazista. Carinzia, Slovenia, Friuli-Venezia Giulia*, Istituto friulano per la storia del movimento di liberazione, Udine 1991, pp. 250, 256-258; A. Cedarmas, *La Comunità Israelitica di Gorizia (1900-1945)*, Istituto friulano per la storia del movimento di liberazione, Udine 1999, p. 228.

¹⁶² Bundesarchiv- Militärarchiv, Freiburg, RS 2-2/21, Teil 2, order from the General Commander of the II. SS-Panzer-Korps, 7 October 1943; See M. Sarfatti, *Gli ebrei* cit., p. 241, note 35.

“For the property holdings of each individual Jew a special file is drawn up (identified as Ju/1-1420 and so on). This contains all the documents (both copies and originals) relating to each operation, from the initial seizure to the evaluation and administration. This means that at any time, this file can provide clear and complete information regarding the individual property, concerning both its evaluation and its administration.

“The evaluation and administration vary according to the type of property. For example, this might be consumer durables (clothes, shoes, underwear and the like), objects of furniture, jewels, bonds and bank deposits or land. The performance of the operations relating to the evaluation and administration of individual property is entrusted to an individual clerk (with resort to auxiliary personnel, when necessary).

“The consumer durables and furnishings found at the time of the seizure are inventoried, evaluated – perhaps with the assistance of an expert – and then put on sale to private individuals. The objects on which a value cannot immediately be placed are stored in a warehouse in a free port, where they remain at the disposal of possible buyers for inspection. The estimated value forms the basis for the selling price, which can however vary in accordance with demand; this is particularly the case with office furnishings and equipment, bearing in mind the greater or lesser possibility of continuing with the business activity (licence). The fixtures (fitted cabinets, shelving, lamps, lights ,etc) are necessarily difficult to use elsewhere and thus are left in the apartment (offices), with the future purchaser thereof being asked to pay an adequate price for them as well. Antique furniture is evaluated on the basis of the opinion of Dr. Frodl, responsible for the protection of monuments in the Operations Zone. Books, on the other hand – with the exception of Hebrew books (prayer books and the like), which are destroyed – are evaluated on the basis of the assessment of Dr. Heigl, Director General of the National Library of Vienna. Commercial businesses are generally liquidated or sold off, their administration is not taken over. The one case in which this latter did happen was that of a paper factory, upon the suggestion of the Economics Department and with its consent; this decision took into account the presence of plant equipment of great value, which could not be sold off at an adequate price, and the existence of a large number of employees who would have been made redundant in the event of closure. Up to 30 June 1944, this factory has realised a net profit of L. 445,447.

“After clearing, the buildings are left to the German Councillor for the city of Trieste, who decides their use (for those left homeless by bombs, for public authorities, offices and so on). The number of these apartments is so far around 400, with commercial premises numbering around 30. Two external agents, paid a weekly salary, are called in to inventory the equipment, utensils and furnishings.

“The valuables (gold, silver, jewellery) of all kinds are, for the moment, left unsold. After having been precisely inventoried, with an indication of the relevant Jewish file, they are stored in lockable cases in a safe-deposit chamber of the Kaertnerbank [Bank of Carinthia] at Klagenfurt. Provisionally, a remainder of this property has also been gathered together and deposited under lock and key in the basement of the Accounts and Funds Department prior to transfer. A total of around 3,800 valuables have so far been inventoried, bearing in mind that sometimes pieces of the same kind are linked together under the same inventory number. The valuables within the safe-deposit chamber of the Kaertnerbank are insured for around 2 million R [RM – *Reichmark*?].

The sequestered bonds (shares, public bonds, etc) are, if not already deposited in a specific bank, held together at the Banca Commerciale Italiana. The 313,533 shares and State bonds (including some 94 different types of shares) have a present market value of L. 452,967,581 and, according to the annual accounts drawn up for the year 1943, would yield as interest (dividends) a sum of 2.5 million lire. However, given that some of the companies concerned are located in areas now occupied by the enemy, this sum cannot be realised in full. The holdings also include a large number of other shares and bonds – such as city and provincial bonds, land bank bonds, bonds in electrical and transport companies, premium loans etc, whose value cannot be assessed with accuracy given the reduced feasibility of the commerce therein.

“The savings deposited are withdrawn, to the extent that the actual savings books are available or when the savings banks are willing to make payments even in the absence of such savings books.

“With regard to funds held in banks, current accounts are closed by withdrawal; deposit accounts, balances in foreign currency and accounts on which mortgages are drawn remain in existence; the balance statements sent out by the banks are checked. Of the 170 safe-deposit boxes sequestered, 100 have so far been opened and emptied. The banks have received instructions that the dividends and interest due are, where there still exists an account in the name of a Jew, to be paid into said accounts. If such do not exist, these are to be paid into a special account of the coffers of the Supreme Commissioner which exists at the Banca Commerciale Italiana (together with indication of which Jewish property it relates to); the Finance Department is to be informed of such payments and transfers.

“With regard to real estate, local land registers are consulted to ascertain the size of the property, its ownership and the possible mortgages or other dues upon it. An administrator is then appointed for the parts of the Jewish property, and must submit quarterly reports. The prompt presentation of accounts is checked, with these latter for the moment only being submitted to cursory verification to see if they cover all the real estate within the individual Jewish property holdings in question; given the personnel available, it has not been possible to undertake a more detailed examination.

“Now, however, there will be an examination of the administrator’s accounts from the very beginning – that is, from the year 1944 – to verify their material and mathematical correctness. For this purpose, an external figure has been called in, an ex-administrator. He will have the task of verifying all the accounts within three months, for a single overall payment of L. 12,000. On the basis of what he observes, he will draw up general directives to be used in the future compilation of the administrators’ accounts.

“From Trieste, the Finance Department currently administers: 15 landed properties located in the provinces of Trieste, Udine and Gorizia, as well as all the Jewish real estate within the province of Trieste. This latter comprises: 258 houses, 42 villas, 115 apartments (including 15 warehouses and 7 commercial business premises; within Italian law it is in fact possible to purchase ownership of single components of one house) and 197 plots of unbuilt land. Overall, 44 administrators have been appointed to administer this real estate.

“Without any distinction as to individual source, all the income from the administration of Jewish property, together with all the costs associated with it, pass through the special account mentioned above – that of the coffers of the Supreme Commissioner which is held at the Banca Commerciale Italiana. In principle, from and into this account come all the separate payments and withdrawals made regarding the individual accounts opened for each Jewish property holding. Proceeds from the sale of equipment, utensils and furnishings whose actual origin in one particular property holding cannot be established (the property having been sequestered some time ago by the police and then held in common with other property); expenses such as salaries paid to those who draw up the inventories; transport costs for the individual property holdings; storage costs; the cost of assessing value and the future payment to the auditor of administrators’ accounts – all these are counted together in a single account. At the moment, the joint sums from sales amount to around 2.3 million, whilst the joint expenses and costs total around 14.2 million. Along with those costs already mentioned, there are the cash payments paid to the freight forwarders – the cost of storage being about 10 million lire. This had to be paid in order to free for transport to Klagenfurt all the sequestered chattels within the free port of Trieste left by the Jews who had fled from the Reich.

“The entire (gross) yield from the various sources of income relating to Jewish property – for example, the sale of equipment, utensils and furnishings; the liquidation of businesses, bank accounts and deposits; the administration of real estate – amounted in 31 January 1945 to around 35 million lire, for a total expense of around 14 million. On 26 February 1945, the total net yield to date from Jewish property amounted to L. 23,054,671.90, as can be seen from the special Funds account at the Banca Commerciale Italiana. Such yield and income appear in the accounts of the Funds under the entry “guardianship” (money of third parties). The bank deposits yield interest of

1/5%. In order to increase yield, it is intended to use 20 million of these funds to make a loan at a higher rate of interest (3%) to the “Adria” Goods Haulage Company.

“On the basis of what I have observed, I would conclude that the (Sub) Finance Department has, with its limited personnel, done everything possible to deal with [its task], bearing in mind the extremely diversified economic situation it is facing (almost all sectors of the economy are involved; and in the early stages of its work, material became available in an irregular, non-constant fashion). With regard to the documents available, detail and care [might be] further improved, in line with the requisites of peacetime – to the extent, that is, that the Department itself becomes more deeply involved in its role as an administrator (see, for example, the assessment of the administrators’ accounts which has already been undertaken). What will definitely become necessary is an assessment of how the banks are administering the Jewish shares, bonds and property in their keeping (prompt transfer of dividends and interest, issue of bank statements, etc). The present documentation is also sufficient for a statistical evaluation required for administrative purposes – for example, the size of individual Jewish assets and of overall Jewish property held; the various components therein and the range of their distribution, etc. In this context, an answer will have to be given to the question regarding who will refund the approximately 10 million lire storage costs paid for the chattels of the Jews, and how the residual general costs (relating to individual Jewish property holdings) are to be divided up.

“Though at the moment not urgent, these organisational matters will require larger numbers of personnel than those presently available to the Department. They must therefore be put on hold until the return to normal conditions.

“Dr. Friedrich Moc honoris.”¹⁶³

The norms and regulations illustrated in this report would continue to be applied in the two following months.

2.b.3 With regard to the seizure of bank accounts and deposits in the Prealpine Operations Zone, there is documentary evidence that on 26 September and 12 October 1943 the Police Headquarters in Belluno informed the Prefecture (specially requesting the information be “passed on to the German authorities”) that a “freeze” had been applied to all Jewish assets in banks (as well as to other chattels and real estate they might possess).¹⁶⁴ In Trento, on 30 October 1943, the “German Commissioner for Banks and Credit Agencies” asked banks to provide a list of the deposits held by Jews and Italian military bodies.¹⁶⁵ And, in Merano, the commanding officer of the Sipo-SD would reply to a 3 November letter from his superior in Bolzano, commenting on the “placing in safekeeping “ (*Sicherstellung*) of the assets and property of the Jews of the place – that is, houses, shops (and stock) and bank accounts (the latter having been frozen, *gesperrt*).¹⁶⁶

In the Adriatic Coastal Operations Zone, we know that on 7 October (that is, seven days before the order of the 14th ; see **2.b.1**) the Trieste Sipo-SD informed the city’s banks that all Jewish deposits were sequestered, requesting indication of any transfer of assets from Jews to Aryans that had taken place since 15 July 1943.¹⁶⁷ In Pola, on 3 November, a bank informed “the police of the German State” that the deposits held by Jews had been “frozen” (*Sperrung*) and, one might therefore deduce, sequestered.¹⁶⁸ In Udine, on 17 November, the Sipo-SD commanded the sequestration “by

¹⁶³ Bundesarchiv, Berlin, R83 *Adriatisches Küstenland*, bd. 1, report (in German) sent from Moc to Zojer, 26 February 1945 (copy).

¹⁶⁴ Prefecture, Belluno, *Gabinetto*, fasc. “Beni ebraici 1938-1944”, police chief in Belluno to the Prefecture of Belluno, 26 September and 12 October 1943 (with handwritten note that the letters were immediately passed on to the German Councillor).

¹⁶⁵ ASBCI, *SFI*, ex-64C, Correspondence with Branch Offices, T-Z, cart. 5, fasc. 7, BCI in Verona to BCI Head Office in Milan, 5 November 1943.

¹⁶⁶ Leo Baeck Institute, New York, *AR-C. 1764, 4465*, Hauser M., transcription of a letter from the Commander of the Sipo-SD in Merano to the Commander of the SIPO-SD in Bolzano, 19 November 1943.

¹⁶⁷ ASUCI, *Credito italiano*, F, Trieste branch, Ispettorato, b. 6, fasc. s.n., Befehlshaber der Sipo-SD in Trieste to the Credito Italiano in Trieste, 7 October 1943; ASCRTS, documentation sent to the Commission; Befehlshaber der SIPO-SD in Trieste to the Cassa di Risparmio in Trieste, 7 October 1943.

¹⁶⁸ See ASUCI, *Credito italiano*, F, Trieste branch, Ispettorato, b. 6, fasc. Correspondence with Pola, copy of two letters from Oberster Kommissar Abteilung Finanzen in Trieste to the Credito Italiano in Pola, 9 August 1944.

police order” (*sicherheitspolizeilich*) of all the deposits the banks held for Jews.¹⁶⁹ In Gorizia, on 19 November, the Sipo-SD ordered the “freezing” – if not more – of all the deposits that the banks held for “persons of Jewish race.”¹⁷⁰ And in Fiume, on 24 November, the Sipo-SD would sequester all Jewish deposits held in banks.¹⁷¹ With regard to the subsequent administration of the sequestered Jewish accounts in the Prealpine Operations Zone, there is documentary evidence that on 3 June 1944 Department III (Finance) ordered a bank in Merano to pay these deposits into account 1211/66 at the Cassa di Risparmio in Bolzano, and that another Merano bank would begin similar transfers on 27 June.¹⁷²

As for the Adriatic Coast Operations Zone, we know that on 4 February 1944 the finance section of the Supreme Commissioner ordered the banks in Trieste to open an account in the name of “Property Administration of the Supreme Commissioner” (*Vermögensverwaltung des Obersten Kommissars*) and to pay into that account all the Jewish deposits.¹⁷³ Furthermore, “from March 1944 onwards” it ordered various banks in the city to pay the sums from Jewish accounts into that which had been opened at the Banca Commerciale Italiana.¹⁷⁴ On 9 August the Finance Section itself ordered a bank in Pola to transfer all Jewish deposits into the same account.¹⁷⁵ On some date before 20 August 1944, the Finance Councillor (*Finanzberater*) to the German Councillor (*Deutscher Berater*) at the Udine Prefecture ordered the transfer of the deposits in two Jewish accounts to account number 183 at the Credito Italiano in Udine.¹⁷⁶ And some time before 28 March 1944 the Finance Councillor to the German Councillor at the Gorizia Prefecture would inform the local banks that he was responsible for the administration of Jewish assets.¹⁷⁷ Some time before 15 July he would begin the transfer of these into an account in the name of “Property Administration of the Finance Councillor” (*Vermögensverwaltung des Finanzberaters*) at the Gorizia Cassa di Risparmio.¹⁷⁸ On 18 July 1944 the Finance Councillor to the German Councillor at the Fiume Prefecture would, having been appointed responsible for Jewish assets by the command of the Sipo-SD, ask a bank to supply an updated list of the deposits;¹⁷⁹ from July 1944 onwards he would order the banks to transfer Jewish deposits into the account “German Councillor for the Province of Carnaro, Finance Section, Exploitation of Assets Division” (*Deutscher Berater fuer die Provinz Quarnero-Abteilung Finanzen-Referat Vermögensverwertung*) at the local Reichskreditkasse.¹⁸⁰ It should be borne in mind that sometimes a deposit in a bank of one province was transferred to the “collection account” in another; certainly in a few cases we know that the

¹⁶⁹ ASBCI, *SFI*, ex-57, cart. 7, fasc. 3, sfasc. 3, copy of the Befehlshaber der Sipo-SD di Udine to the BCI in Udine, 17 November 1943; ASUCI, *Credito italiano*, F, Trieste branch, Ispettorato, b. 6, Correspondence with Udine, copy of Befehlshaber der Sipo-SD in Udine to the Credito Italiano in Udine, 17 November 1943 (also in *ibid.*, Direzione centrale, Cont., blocco II (2nd part), pac. 1, b. 1).

¹⁷⁰ ASBCI, *SFI*, ex-64A, Correspondence with Branch Offices, A-L, cart. 3, fasc. 22, copy of circular from Befehlshaber der Sipo-SD in Gorizia to banks in Gorizia, 19 November 1943.

¹⁷¹ ASUCI, *Credito italiano*, F, Trieste branch, Ispettorato, b. 6, fasc. Correspondence with Fiume, minutes of meeting held at the Banca d'Italia in Fiume on 24 November 1943; *ibid.*, Banca d'Italia of Fiume to banks in Fiume, 24 November 1943.

¹⁷² Credito Meranese per il Commercio e l'Industria to Oberster Kommissar Arbeitsbereich III-Finanzen, 12 June 1944; Banco di Roma in Merano to the Commissioner for Jewish Property in Merano, 13 January 1953; see the chapter “The Prealpine Operations Zone”.

¹⁷³ ASBCI, *SFI*, ex-64A, Correspondence with Branch Offices, T-V, cart. 5, fasc. 9, copy of letter from Banca d'Italia in Trieste to Oberster Kommissar Abteilung Finanzen in Trieste, 11 February 1944.

¹⁷⁴ ASBCI, *SFI*, ex57, cart. 7, fasc. 3, sfasc.2, BCI in Trieste to BCI Head Office in Milan, 23 June 1945.

¹⁷⁵ ASUCI, *Credito Italiano*, F, Trieste branch, Ispettorato, b. 6, fasc. Correspondence with Pola, copy of two letters from Oberster Kommissar Abteilung Finanzen in Trieste to Credito Italiano in Pola, 9 August 1944.

¹⁷⁶ ASBCI, *SFI*, ex57, cart. 7, fasc. 3, sfasc. 3, Befehlshaber der Sipo-SD in Udine to the BCI in Udine, various (undated) letters (copy).

¹⁷⁷ ASBCI, *SFI*, ex64A, Correspondence with Branch Offices, A-L, cart. 3, fasc. 22, Banca d'Italia in Gorizia to the BCI in Gorizia, 28 March 1944.

¹⁷⁸ ASUCI, *Credito italiano*, F, Trieste branch, Ispettorato, b. 6, fasc. Correspondence with Udine, copy from the Finanzberater of the Deutscher Berater in Udine to Credito Italiano in Udine, 15 July 1944; A. Cedarmas, *La Comunità Israelitica di Gorizia* cit., p. 228.

¹⁷⁹ ASUCI, *Credito italiano*, F, Trieste branch, Ispettorato, b. 6, fasc. Correspondence con Fiume, copy of Abteilung Finanzen in Fiume to the Credito Italiano in Fiume, 18 July 1944.

¹⁸⁰ *Ibid.*, fasc. s. n., carbon copy of Credito Italiano in Trieste to Credito Italiano Head Office, 21 June 1945, with outline of the Jewish accounts in Fiume; *ibid.*, fasc. Correspondence with Fiume, copy of letters from Abteilung Finanzen in Fiume to the Credito Italiano in Fiume, 3 and 16 August 1944.

principle applied was that the actual residence of the holder of the account was the determinant factor in deciding where his/her assets were transferred.

Into the account opened at the Banca Commerciale Italiana were transferred “the sums raised by the sale of Jewish property carried out by the Supreme Commissioner, and rents paid for Jewish houses, etc.”¹⁸¹

2.b.4 On 8 October the Supreme Commissar for the Adriatic Coast Operations Zone “sequestered certain lots of personal effects in the free port of Trieste, held either at forwarding agents or in the General Warehouses”¹⁸² - that is, the hundreds of chests or *liftvan* owned by foreign Jews which, because of the war, had remained stuck in Trieste and then, on 11 May 1943, been sequestered by the Prefect of Trieste. On 12 January the Supreme Commissioner pointed out that this Jewish property (*juedisches Vermoegen*) has been sequestered (*beschlagnahm*t) and ordered it to be transferred.¹⁸³ On 25 August 1944, 499 chests and 989 single pieces of luggage (for a total weight of 1,630,998 kgs) were sent to Berlin; and 170 chests and 7,719 individual pieces of luggage (total weight: 1,365,976 kg.) to Carinthia.¹⁸⁴

2.b.5 The Finance Section in the Adriatic Coast Operations Zone appointed the *Gueterverkehrsgesellschaft Adria* (the Adria Goods Haulage Company) to sell off the sequestered goods (in particular, those seized from the ports warehouses). The company had been set up at the end of 1943 by the Supreme Commissioner himself and remained under his direct control.¹⁸⁵

2.b.6 The German authorities would not permit the application of RSI norms and regulations within the Operations Zones.

In the Adriatic Coast Zone, the “Official Order Sheet” dated 15 October 1943 published an order from the Supreme Commissioner of 1 October 1943. In this, he “assumed all civil powers” and reserved the right to annul or modify the “laws then in force in the provinces.”¹⁸⁶ Hence, he – like his counterpart in the Prealpine Operations Zone – did not recognise the norms governing the confiscation of Jewish property introduced by the RSI.

With regard to the protests from the local “Italian” authorities, there is documentary evidence that the Prefect of Trieste immediately informed the German Councillor to his Prefecture of the telegram from the RSI (29 January 1944) containing the first information on the dld 2/1944 (**2.a.3.1**), asking the Councillor “to apprise him what measures should be taken in this prefecture”.¹⁸⁷ The reply (on 1 March) invited the Prefect “not to take any measures” and announced that within the “next few days” (*naechsten Tage*) there would be an order from the Supreme Commissioner.¹⁸⁸ But on 24 November 1944 the Councillor then informed the Prefect that this Commissioner had “made clear” (*eroeffnet*) that the dld 2/1944 “had no juridically force” (*nicht rechtswirksam geworden ist*) in the Adriatic Coast Operations Zone and that the matter it covered was the exclusive responsibility of the Supreme Commissioner himself.¹⁸⁹ On 7 December he would also tell the Italian official that he could not provide him with a copy of the instructions and orders from the Supreme Commissioner, who had no intention of issuing a “conclusive directive” (*abschliessende Verordnung*) on the subject.¹⁹⁰

¹⁸¹ ASBCI, *SFI*, ex57, cart. 7, fasc. 3, sfasc. 2, BCI in Trieste to BCI Head Office in Milan, 23 June 1945.

¹⁸² NA, *AMG, Italy*, 10000.167, fasc. 250, Bruno de Steinkuehl to Oberste commissar, 13 October 1943 (copy, enclosed with “Report on activities of the undersigned Bruno de Steinkuehl as sequestrator of Jewish property “household goods” lying in the Free Port of Trieste, July 1945”).

¹⁸³ *Ibid.*, Oberste Kommissar to Bruno de Steinkuehl, 12 January 1944 (copy, as above).

¹⁸⁴ *Ibid.*, Bruno de Steinkuehl to the Prefecture in Trieste, 25 August 1944 (copy, as above).

¹⁸⁵ E. Apih, Documenti sulla politica economica tedesca nella Venezia Giulia (1943-1945), in *Fascismo Guerra Resistenza. Lotte politiche e sociali nel Friuli-Venezia Giulia 1918-1945*, Trieste 1969, pp. 371-374, 390-398; S. Bon, *Gli ebrei a Trieste 1930-1945. Identità, persecuzione, risposte*, Libreria editrice goriziana, Gorizia 2000, pp. 338-340; A. Walzl, *Gli ebrei cit.*, pp. 261-266.

¹⁸⁶ ASBCI, *SFI*, ex-64C, Correspondence with Branch Offices, T-Z, cart. 5, fasc. 9, “Foglio annunci legali” from the Prefecture in Trieste, No. 56, 17 January 1944 (for the official Italian translation); ASTs, *Prefettura, Gabinetto*, b. 465, fasc. Frigessi Arnaldo (for a copy and unofficial translation of the “Official Order Sheet of the Supreme Commissioner in the Adriatic Coast Operations Zone”, No. 1, 15 October 1943).

¹⁸⁷ ASTs, *Prefettura, Gabinetto*, b. 367, Prefect of Trieste to the Deutscher Berater in Trieste, 29 January 1944.

¹⁸⁸ *Ibid.*, Deutscher Berater in Trieste to Prefect of Trieste, 1° March 1944.

¹⁸⁹ *Ibid.*, Deutscher Berater in Trieste to Prefect of Trieste, 24 November 1944.

¹⁹⁰ *Ibid.*, Deutscher Berater in Trieste to Prefect of Trieste, 7 December 1944.

The protests from the central authorities of the RSI can be summarised thus. Following a letter of December 1943 from the Superintendent for Monuments and Galleries in Friuli Venezia Giulia,¹⁹¹ the RSI Foreign Ministry drew up a Note on 3 February 1944 which was seen a few days later by Mussolini himself;¹⁹² then, on 10 February 1944, the Ministry presented the German Embassy with an official protest against the sequestration of art objects and other property being carried out by the “Authorities of the German police” in the Adriatic Coast Operations Zone, urging that these things be handed over to the Heads of Province.¹⁹³

In the meantime, the Head of Province in Udine had – in response to a request from the “German Authorities of this Province,” motivated by the desire that “the requisition of works of art owned by Jews [...] might be carried out to their advantage”¹⁹⁴ – informed the various *podestà* that the instructions he had previously sent out following the ministerial circular of 1 December 1943 (2.a.1.5) were now modified: the works of art were “to be kept at the disposal of the German Authorities.”¹⁹⁵

The Ministry of Finance informed the Foreign Ministry that, as communicated by the Prefecture of Trieste [see above], on 1 March 1944 the German Councillor at the Prefecture had “ordered, within the territory of the province itself, the suspension of the application of dlgs n.2, introduced by *Il Duce* on 4 January 1944, relating to the confiscation of Jewish property,” announcing the imminent arrival of a German order on the matter covering the entire Adriatic Coast Operations Zone.¹⁹⁶ The minister added that he had received news of similar measures from the prefectures of Pola and Udine; and that, on 14 March, the local revenue office in Fiume had communicated that the German Councillor had informed the Prefecture that “the Supreme Commissioner has reserved to himself responsibility for Jewish property.”¹⁹⁷ Finally, he mentioned that the Confederation of Banks and Insurance Companies had informed him of the sequestration order issued on 7 October 1943 by the Head of Police in the Adriatic Coast Operations Zone (2.b.3).¹⁹⁸

Following receipt of this information, on 11 April the RSI’s Foreign Ministry submitted to Mussolini and then presented to the German Embassy a note which ended with the request that the dlgs 2/1944 “might find full application and that any property or assets sequestered or confiscated be handed over to the Prefectures concerned.”¹⁹⁹ On 29 May the Ministry presented the Embassy with a brief new note urging a response to its two predecessors.²⁰⁰ On 11 August 1944, following information from the Ministry of Finance regarding two new reports of German sequestrations in the Prealpine Operations Zone and the possible intention of “the German Authorities in the Province of Trieste” to take possession of the Jewish property already sequestered by the EGELI on the basis of the rdl 126/1939,²⁰¹ the Foreign Ministry presented the German Embassy with a further note summarising the entire affair.²⁰²

Finally, on 6 September 1944, the German Embassy replied to the note of 29 May with its own note (*Aufzeichnung*). After recalling that, at the end of 1943, the Supreme Commissioner for the Adriatic Coast Operations Zone had issued secret orders regarding the treatment of Jewish property, this stated that within that Zone the dlgs 2/1944 had not come into force (*nicht in Kraft getreten*), given that there legislative power (*gesetzgebende Gewalt*) was wielded (*wahrgenommen*) exclusively (*ausschliesslich*) by the Supreme Commissioner, in accordance with his order number 1 of 1 October 1943. The Embassy added that no decision had yet been made with regard to the fate

¹⁹¹ ASMAE, *RSI, Gabinetto*, b. 164, fasc. IV.1, sfasc. 6, Superintendent for Monuments and Galleries in Friuli Venezia Giulia to the Ministry of Education (Head Office for the Arts), 12 December 1943 (copy).

¹⁹² *Ibid.*, note for Mussolini, 3 February 1944, with his acknowledgment of receipt and underlinings.

¹⁹³ *Ibid.*, Note to the Germany Embassy, 10 February 1944.

¹⁹⁴ *Ibid.*, Head of Province in Udine to Ministry of Education (Head Office for the Arts), 24 January 1944 (copy).

¹⁹⁵ *Ibid.*, Prefect of Udine to the *podestà* and commissioners in the province, 24 January 1944 (copy).

¹⁹⁶ *Ibid.*, Ministry of Finance to the Foreign Ministry, 6 April 1944.

¹⁹⁷ *Ibidem*.

¹⁹⁸ *Ibidem*.

¹⁹⁹ *Ibid.*, verbal note 11 April 1944; an attached sheet bears the annotation: “approved by *Il Duce* 13/4”.

²⁰⁰ *Ibid.*, note for the German Embassy, 29 May 1944.

²⁰¹ *Ibid.*, Ministry of Finance to Foreign Ministry, 10 July 1944.

²⁰² *Ibid.*, note for the German Embassy, 11 August 1944.

(*einzuweisen*) of the property sequestered; furthermore, should the RSI present a request (*Wunsch*) that within the Adriatic Coast Operations Zone the future treatment of Jewish property be based on regulations analogous to those in dlG 2/1944, the question would be studied in detail (*so muesste diese Frage einem eingehenden Studium zugefuehrt werden*).²⁰³

On 28 September 1944 a new note from the RSI Foreign Ministry to the German Embassy “took cognisance of the fact that the question of the fate of the confiscated Jewish property has yet to be settled” and proposed “to reach an agreement” to decide “the method of application within the provinces of the Adriatic coast” of the dlG 2/1944.²⁰⁴

On 27 October the German Embassy acknowledged receipt, with the assurance that it had transmitted the request to “the competent German authorities.”²⁰⁵ No later documents on the question are known.

In a note sent direct to the Foreign Minister urging attention to the matter, the Finance Minister summarised the situation thus: “the seizure of Jewish property” by the Germans would “result in a substantial loss of State revenues.”²⁰⁶

There is no extant evidence of similar claims and worries with regard to the deportation of the owners of said property.

²⁰³ *Ibid.*, *Aufzeichnung* [note] from the German Embassy, 16 September 1944.

²⁰⁴ *Ibid.*, note for the German Embassy, 28 September 1944.

²⁰⁵ *Ibid.*, verbal note from the German Embassy, 27 October 1944.

²⁰⁶ *Ibid.*, Minister of Finance to Foreign Minister, 16 April 1944.