

2.C BANS AND LIMITATIONS REGARDING BUSINESS ACTIVITIES

2.c.1 The revocation of residence permits for most **foreigners “of Jewish race”** (see **2.b.1**) meant that these people had to liquidate their businesses.

In the province of Bolzano, in preparation for the expulsion of all foreign Jews (see **2.b.1**), on 9 June 1939 the Prefect revoked “all the commercial licences” held in their name.¹¹⁵

On 19 November 1938 – the same day as the publication in the *Gazzetta Ufficiale del Regno d’Italia* of rdl 1728/1938 – the Minister of Justice ordered all notaries “to abstain until further notice” from the drawing-up of any contract of **purchase or sale** of such assets by people “of Jewish race” (he made explicit reference to the article in the law concerning the limits on the ownership of real estate and businesses).¹¹⁶ With the exclusion of crafts and blue-collar trades, the rdl 126/1939 would lay down that, from 11 February, there could be no sale of any privately-owned business (or plant and equipment thereof) that was even partly owned by Italians of “Jewish race” who did not enjoy “discriminatory” exemption until the final classification of these businesses in categories a, b or c; this would be completed in the second half of the year (see, **2.a.5**). However, these owners were allowed – within six months – to cede such ownership to family members (spouses or descendants) who were not “of Jewish race.”¹¹⁷

2.c.3 In November 1938 it was laid down that Italians “of Jewish race” not enjoying “discriminatory” exemption could not be **the owners of or partners in unlimited companies** in the industrial and commercial sectors that fell within category a - that is, companies officially declared of “importance to national defence”- or b – that is, companies with at least 100 employees on the 11 February 1939 (in specific conditions, if the figure was higher, the year of reference was 1938; see **2.a.5**. When the person was owner of or partner in more than one company, it was the overall total that counted). The full regulations regarding this matter were drawn up in February 1939. With regard to these companies - that is, excluding those in category c - the rdl 129/1939 laid down the following: **I.** For six months they would be placed under the supervision of a government-appointed Commissioner with ample powers, including the power to take over direct running of the company. During this period, the owners or partners could, upon receipt of ministerial permission, proceed to the complete or partial sale to non-Jewish purchasers.¹¹⁸ **II.** After this six-month period, those businesses which had not been sold in the above-mentioned fashion could either “be taken over by a limited company already set up or to be set up”, upon a payment to be decided by the Commissioner and the ministry (the owner could appeal to a committee, two of whose three members would be nominated by the ministry and the purchaser), or it could be liquidated by the local Provincial Council for Corporations.¹¹⁹ **III.** The sum paid for the sale or raised by the liquidation had to be invested in consolidated registered bonds – that is, bonds which could not be “transferred from one living individual to another” except with special authorisation from the Ministry¹²⁰ (in the two known cases of this, the bonds purchased were of 4% and 5%).¹²¹ **IV.** The procedure was to be halted in cases of: bankruptcy; the obtaining of “discriminatory” exemption; loss of Italian citizenship; the transfer of ownership to heirs not subject to the law. If the sale or liquidation had already gone ahead, the bonds received in payment thence became “transferable”.¹²² On 30 May 1940, the law was extended to stateless Jews.¹²³ With regard to the rights and powers

¹¹⁵ See the chapter “The Prealpine Operations Zone”.

¹¹⁶ ASTs, *Prefettura, Gabinetto*, b. 368, telegram from the Minister of Justice to the Public Prosecutor’s Offices throughout the kingdom, 19 November 1938 (copy).

¹¹⁷ rdl 126/1939 (art. 54, 55).

¹¹⁸ rdl 126/1939 (art. 56-58).

¹¹⁹ rdl 126/1939 (art. 60-65).

¹²⁰ rdl 126/1939 (art. 58, 62, 64).

¹²¹ CCIAA, Turin, documentation sent to the Commission, fasc. “Ditta 102.779, Ditta Giovanni Rotta e C.”, act for the cession of company share, notary S. Mandelli, n. 10297-5885, Turin; “*Monitore dei Tribunali*”, 1947, p. 121; see also the chapter *Industrial and commercial assets*.

¹²² rdl 126/1939 (art. 67).

¹²³ CCIAA, Pisa, *Affari generali*, 194°, cat. A.26.5, “Stateless Jews”, Ministry of Corporations to Prefects-Presidents of Provincial Councils of Corporations, 30 May 1940.

allowed the owner, a sentence handed down after the war by a Milan court observed that “the owner found himself in much the same situation as a bankrupt stands in relation to the official receiver and the bankruptcy judge, or as a person declared incapable of managing his own affairs stands in relation to the bodies appointed to protect them.”¹²⁴

Following the census drawn up on February 1939, it appeared that in the country there were 11 companies in category b; nine of them were entirely owned by those “belonging to the Jewish race”, the other two partially so (with Jews having two one-third shares in one, and a half share in the other; see **2.a.5**). One of the wholly-owned companies - and two partial shares - were ceded to an “Aryan” spouse.¹²⁵ In the case of the other eight companies (three of which were owned by one man) and the other one-third share, compulsory purchases took effect (or the companies were liquidated).¹²⁶

Because of the ambiguity of the circular set round by the Ministry of Corporations with regard to the application of rdl 126/1939 – where reference to the “liquidation” of the “remaining companies” (see **2.c.3/II**, above) seemed to include those which fell within category c – the Provincial Council of Corporations in Bolzano would, on 12 April 1939, start proceedings for the liquidation of 8 “Jewish-Italian companies” of type c.¹²⁷

2.c.4 In December 1938 the circular concerning the interpretation of the rdl 1728/1938 sent out by the Ministry of the Interior specified that, just as public administrations and related offices could not have employees of “Jewish race” (see **2.b.2**, **2.b.3**), “henceforward they cannot entrust any appointments, contracts, etc. of any type to persons of such race. So, it is forbidden for public service contracts or individual contracts for services or supplies to be granted to persons of such race.”¹²⁸ The following February, rdl 126/1939 authorised all said administrations “to rescind **concessions** [and] by right of their authority end all **contracts for work or supplies**” that had been granted to or stipulated with persons “of Jewish race” or non-public companies/businesses that were owned or managed by them (the rescission could be annulled if the Jew was replaced by “a person of non-Jewish race who met with the approval of the Administration”).¹²⁹ The rdl 126/1939 concerned only those who did not enjoy “discriminatory” exemption; the following July, however, it was decided that “even if enjoying such “discrimination”, Jews must no longer continue to have such relations with State administrations.”¹³⁰

Already on 25 March 1939, the General Superintendence of the Italian State had invited all companies providing supplies and services to produce “documentation proving that the owners, managers, administrators, directors, agents and representatives of said company are of Aryan

¹²⁴ *Foro italiano*, 1944-46, Giurisprudenza civile e commerciale, p.817, Milan Law Courts, ruling of 10 December 1945.

¹²⁵ *Gazzetta Ufficiale del Regno d'Italia*, 1939, n. 227, 287 (28 September, 12 December); 1940, n. 75 (29 March).

¹²⁶ On the three Roman businesses of Piperno Alcorso, see *Gazzetta Ufficiale del Regno d'Italia*, 1939, n. 247 (21 October); ACS, SPD, CO, b. 373, fasc. 134.123; A. G. Ricci (ed.), *Verbalì del Consiglio dei Ministri July 1943-May 1948*. Edizione critica, vol. IV: *Governo Bonomi 12 December 1944-21 June 1945*, Presidenza del consiglio dei ministri, Roma 1995, pp. 529-530, 538-541. On the two Florentine businesses of Giulio Forti and SIVA, see *Gazzetta Ufficiale del Regno d'Italia*, 1940, n. 43 (21 February); A. Minerbi, *La comunità ebraica di Firenze (1931-1943)*, in E. Collotti (ed.), *Razza e fascismo* cit., vol. I, pp. 167-169. On the two Turin businesses of Norzi and Rotta (part share owned), see the documentation sent to the commission by the *Camera di commercio, industria, artigianato e agricoltura di Firenze*. On the Ferrara business of R. Hirsch, see *Gazzetta Ufficiale del Regno d'Italia*, 1939 n. 223 (23 September), 1944, n. 44 (22 February); R. Parisini, *La ricostituzione dei gruppi dirigenti a Ferrara dopo la Liberazione*, in *Italia contemporanea*, n. 192 (September 1993), p. 446, note 15; City Hall, Ferrara, documentation sent to the Commission. On the Sonnino business in Varese, see *Foro italiano*, 1944-1946, p. 817, Milan Law Courts/Ruling of 10 December 1945. See also ACS, MF, SBE, b. 19, fasc. 46, table *Aziende di cittadini italiani di razza ebraica*; see also the chapter *Industrial and commercial assets*.

¹²⁷ ASGo, *Camera di commercio*, b. 127, fasc. 597, Ministry of Corporations to Prefects-Presidents of Provincial Councils of Corporations, 2 March 1939; see also the chapter *The Prealpine Operations Zone*.

¹²⁸ ACS, MI, *Demorazza*, b. 4, fasc. 17, Ministry of the Interior to Prefects and other public authorities, 22 December 1938; quoted in M. Sarfatti, *Documenti della legislazione antiebraica. Le circolari*, in *La rassegna mensile di Israel*, vol. LIV, n. 1-2, January-August 1988, p. 180.

¹²⁹ Rdl 126/1939 (art. 69).

¹³⁰ ACS, MI, *Demorazza*, b. 2, fasc. 9, note from the Director of the Head Office for Demography and Race to the Undersecretary of the Interior, with annotations by the recipient dated 8 July 1939.

race.”¹³¹ In the meantime the State Railways had decided “to provide in general for the rescission or revocation” of those supply contracts then in force,¹³² with the exception of those “which it was in the interests of the Administration to see carried on to their completion.”¹³³ The State Monopolies decided on 27 May 1939 to end at least one contract awarded for the re-sale of the goods supplied by the Monopoly.¹³⁴ The ban on the granting of licences and permits can also be seen at the origin of the enforced closure of one newsagent’s business, the owner of the kiosk occupying public land.¹³⁵ As for supplies, in May 1939 the Undersecretary of the Interior would jot ‘NO’ on a note bearing a request from the Ospedale al Mare on the Venice Lido to continue, provisionally, acquiring coffee from a “Jewish company” – a request motivated by the need to guarantee the hospital supplies of a product which was in such short supply that it was impossible to obtain it from other companies.¹³⁶

2.c.5 On 11 October 1938 the Minister of Corporations issued a ban upon the granting of all **licences for the opening of Jewish shops** (see also **1.a.4**) and the **ceding** of licences by those “of different race” to Jews.¹³⁷ (In April 1939, the Perugia chocolate factory applied to the authorities for attestation regarding the “Aryanness” of its management, “necessary in order to obtain a licence for one of our shops in Rome”).¹³⁸

On 17 February 1940, the same ministry issued a circular stating that the Head Office for Demography and Race at the Ministry of the Interior was the authority responsible for all questions relating “to the issuing and transfer of commercial business licences to Italian citizens of Jewish race;”¹³⁹ on 11 March 1942, it would point out that this regulation also applied to stateless Jews.¹⁴⁰

The bans which we know the Ministry of Corporations to have issued upon suggestion from the Head Office for Demography and Race involved the following: the **collection of scrap metal** (pre-July 1940);¹⁴¹ the **sale of school textbooks** (pre-27 October 1940);¹⁴² the registering of new **representatives** (28 February 1942).¹⁴³

2.c.6 After the June 1939 order that a note of “race” had to be added to all “documents relating to licences and police permits”,¹⁴⁴ on 15 April 1941 the Ministry of the Interior decided to suspend the issue of “**new police permits**” for commercial businesses belonging to “persons of Jewish race”.¹⁴⁵

2.c.7 Between 1939 and 1943, the Ministry of the Interior (Head Office for Public Security, upon consultation with the Head Office for Demography and Race) forbade the issue to persons of “Jewish race” of licences relating to the following fields: **tourist guides and interpreters** (28

¹³¹ ACS, *MF, SBE*, b. 18, fasc. 8, Ministry of Finance (Public Supplies Office) to all companies that were its suppliers, 25 March 1939.

¹³² AUCEL, *UCII* 1933-1947, b. 65A, fasc. “1944-1945. Rapporti con i ministeri”, Italian State Railways (Head Office) to Services Department and Heads of District, 28 February 1939 (copy).

¹³³ *Ibid.*, Italian State Railways (Head Office, Personnel Department) to individual Staff Offices, 9 March 1939 (copy).

¹³⁴ *Ibid.*, b. 65A, fasc. “1944-1945. Comunità”, Bianca Pesaro to High Offices of State Monopolies, 29 January 1946 (copy); see also CCIAA, Venezia, fasc. “Ditta Gesùà Salvadori Angelo”, declaration of the closure of “tobacconist’s business” following the “revocation of licence”, 13 December 1939.

¹³⁵ S. Bon, *Gli ebrei a Trieste* cit., p. 248.

¹³⁶ ACS, *MI, Demorazza*, b. 2, fasc. 9, sfasc. 16, note from the Director of the Head Office for Demography and Race to the Undersecretary of the Interior, with written annotations by the recipient dated 20 May 1939.

¹³⁷ ASSp, *Prefettura*, b. 28, fasc. 2, Minister of Corporations to Prefects, 11 October 1938.

¹³⁸ 138 CCIAA, Perugia, documentation sent to the Commission, Società anonima Perugia to Provincial Council of Corporative Economy in Perugia, 19 April 1939.

¹³⁹ ASGo, *Camera di commercio*, b. 127, fasc. 597, Ministry of Corporations to Prefects-Presidents of Provincial Councils of Corporations, 17 February 1940.

¹⁴⁰ ASBg, *Camera di commercio*, b. 697, fasc. 16, Ministry of Corporations to the Provincial Council of Corporations in Bergamo, 11 March 1942.

¹⁴¹ CCIAA, Perugia, documentation sent to the Commission, circular from the Provincial Council of Corporations in Perugia, 25 July 1940.

¹⁴² ISRCn, *Camera di commercio*, documentation sent to the Commission, fasc. 3, copy of circular sent from the Ministry of Corporations to Prefects-Presidents of Provincial Councils of Corporations, 27 October 1940.

¹⁴³ ASBg, *Camera di commercio*, b. 697, fasc. 16, Ministry of Corporations to Prefects-Presidents of Provincial Councils of Corporations, 28 February 1942.

¹⁴⁴ ACS, *MI, Demorazza*, b. 2, fasc. 9, sfasc.9; the directive was later confirmed in the rdl 635/1940 (art. 12).

¹⁴⁵ ASMi, *Prefettura, Gabinetto*, cat. 29, b. 1, fasc. 1, sfasc. A, copy of circular from Ministry of the Interior to Prefects, 15 April 1941.

February 1939)¹⁴⁶; **distribution of publications** (27 May 1939; only applying to those Jews who did not enjoy “discriminatory” exemption);¹⁴⁷ **travel and tourist agencies** (14 July 1939)¹⁴⁸; **the renting-out of rooms** (24 July 1939. This ban was extended to spouses “of Aryan race” on 25 October 1939; then on 5 December 1939 to the **renting-out of furnished apartments**. It was rescinded on 16 April 1940 as far as the renting of rooms reserved for Jews was concerned);¹⁴⁹ the **production and sale of military uniforms** (5 December 1939 and 14 January 1940; extended on 13 August 1940 to spouses of “Aryan race” who might have taken over the business);¹⁵⁰ the **running of boarding houses** (12 December 1939, also for spouses “of Aryan race”, but excluding boarding houses exclusively for Jews);¹⁵¹ **patent offices** (12 January 1940);¹⁵² **business agencies** (12 January 1940, extended in July 1940 to spouses “of Aryan race” who might have taken over the business);¹⁵³; the **collection and re-sale of old military uniforms and clothing** (14 January 1940, extended on 13 August 1940 to spouses “of Aryan race” who might have taken over the business);¹⁵⁴ **trading in precious stones** (30 January 1940, extended on 21 August 1940 to spouses “of Aryan race” who might have taken over the business);¹⁵⁵ the **running of bars and the sale of alcoholic beverages** (29 February 1940, extended on 30 July 1940 to spouses “of Aryan race” who might have taken over the business);¹⁵⁶ **itinerant vending** (30 July 1940, extended 12 November 1941 to spouses “of Aryan race” who might have taken over the business);¹⁵⁷ **trading in antiques and works of art** (13 September 1940);¹⁵⁸ **professional photography** (23 September 1940, also for spouses of “Aryan race”);¹⁵⁹ the **sale of dentistry articles and fittings in precious metals** (post-September 1940);¹⁶⁰ **business intermediation** (20 October 1940);¹⁶¹ **dance schools** (20 January 1941);¹⁶² **street garage services** and the renting of garage space (31 January 1941);¹⁶³ the **sale of used books** (2 April 1941, also for spouses “of Aryan race” who might have taken over the business);¹⁶⁴ **administration of houses or apartment buildings** (6 April 1941, excluding houses and apartment buildings exclusively for Jews);¹⁶⁵ the **sale of radio devices** (12 April 1941);¹⁶⁶ the **sale of leather goods in hotels** (4 May 1941, also for spouses “of Aryan race” who might have taken over the business);¹⁶⁷ **trading in wool rags and used wool** (10 July 1941);¹⁶⁸ **printing** (5

¹⁴⁶ Circular from Ministry of the Interior, 28 February 1939, summarised in a ministry document quoted in S. Caviglia, *Un aspetto sconosciuto* cit., p. 260.

¹⁴⁷ Circular from the Ministry of the Interior, 27 May 1939, summarised in a ministry document quoted in *ibid.*, p. 258.

¹⁴⁸ Circular from the Ministry of the Interior, 14 July 1939, summarised in a ministry document quoted in *ibid.*, p. 255.

¹⁴⁹ Circulars from the Ministry of the Interior, 24 July, 25 October and 5 December 1939, 16 April 1940, summarised in a ministry document quoted in *ibid.*, p. 257.

¹⁵⁰ Circulars from the Ministry of the Interior, 14 January and 13 August 1940, summarised in a ministry document quoted in *ibid.*, p. 259; circulars from the same ministry, 5 December 1939, summarised in a ministry document quoted in *ibid.*, p. 266.

¹⁵¹ Circular from Ministry of the Interior, 12 December 1939, summarised in a ministry document quoted in *ibid.*, p. 256.

¹⁵² Circular from Ministry of the Interior, 12 January 1940, summarised in a ministry document quoted in *ibid.*, p. 255.

¹⁵³ Circular from Ministry of the Interior, 12 January 1940 and subsequent directives, summarised in a ministry document quoted in *ibid.*, p. 255.

¹⁵⁴ Circulars from Ministry of the Interior, 14 January and 13 August 1940, summarised in a ministry document quoted in *ibid.*, p. 259.

¹⁵⁵ Circulars from Ministry of the Interior, 30 January and 21 August 1940, summarised in a ministry document quoted in *ibid.*, pp. 258-259.

¹⁵⁶ Circulars from Ministry of the Interior, 29 February and 30 July 1940, summarised in a ministry document quoted in *ibid.*, p. 260.

¹⁵⁷ *Ibid.*, pp. 244-249.

¹⁵⁸ Circular from Ministry of the Interior, 13 September 1940, summarised in a ministry document quoted in *ibid.*, p. 263.

¹⁵⁹ Circular from Ministry of the Interior, 23 September 1940, summarised in a ministry document quoted in *ibid.*, p. 260.

¹⁶⁰ ACS, MI, DGPS, div. AAGRR, *Massime* (part not yet catalogued), S11, fasc. 87/27, copy of communication from the Head Office for Demography and Race to Head Office for Public Security.

¹⁶¹ Circular from Ministry of the Interior, 20 October 1940, summarised in a ministry document quoted in S. Caviglia, *Un aspetto sconosciuto* cit., p. 255.

¹⁶² Circular from Ministry of the Interior, 20 January 1941, summarised in a ministry document quoted in *ibid.*, p. 268.

¹⁶³ Local police chief in Ragusa to Personnel Offices, 4 April 1941, quoting a circular from the Ministry of the Interior of 31 January 1941, quoted in: Liceo scientifico statale con annessa sezione classica di Vittoria, *Campagna razziale* cit., p. 104.

¹⁶⁴ 164 Circular from Ministry of the Interior, 2 April 1941, summarised in a ministry document quoted in S. Caviglia, *Un aspetto sconosciuto*, cit. pp. 268-269.

¹⁶⁵ Circular from Ministry of the Interior, 6 April 1941, summarised in a ministry document quoted in *ibid.*, p. 264.

¹⁶⁶ Circular from Ministry of the Interior, 12 April 1941, summarised in a ministry document quoted in *ibid.*, p. 264.

¹⁶⁷ Circular from Ministry of the Interior, 4 May 1941, cited in a ministry document quoted in *ibid.*, p. 269.

September 1941);¹⁶⁹ **typing agencies** (22 October 1941);¹⁷⁰ **trading in secondhand goods** (29 March 1942, also for spouses “of Aryan race” who might have taken over the business);¹⁷¹ **trading in non-wool rags** (June 1942);¹⁷² **the sale of books and articles for children, of playing cards, optical devices, religious objects, stationery, the collection of refuse, sewing schools.**¹⁷³

Of all of these bans, that regarding itinerant vendors affected the most people. Its effects were particularly felt in Rome, where there were registered some 635 c-category businesses of this type¹⁷⁴. The Union of Italian Jewish Communities would estimate the following year that the measure affected around “900 heads of families in the poorer levels of society, each one responsible for the support of numerous children and other dependents;” the Union further observed that “in the absence of any other way out of their situation, despair might drive many of these to support themselves and their families through illicit activities.”¹⁷⁵

2.c.8 With regard to **spouses “of Aryan race”**, it was decided in November-December 1942 that in no circumstances could these take over the businesses of their spouse “of Jewish race” (thus reversing many of the norms described in **2.c.7**); the “Aryan” spouse in a mixed marriage could only obtain or keep a business license if he was the male member of the couple.¹⁷⁶

2.c.9 In April 1939 persons of “Jewish race” were forbidden to work as **independent insurance agents.**¹⁷⁷

2.c.10 In November 1938 the Ministry for Currency and Foreign Exchange rescinded the authorisation that had been granted to Jews or their companies to act as **exchange brokers.**¹⁷⁸ In March 1940, the Head Office for Demography and Race would “upon orders from above”, decide to prohibit all persons of “Jewish race” from the “**supply of credit and banking** and all other similar and related activities.”¹⁷⁹ The Inspectorate for the Defence of Savings and the Provision of Credit would, towards the end of its survey regarding the matter, state that there were three banks owned by Jews, adding that it was taking measures “to have the above-mentioned companies absorbed by other credit institutions [or] to have the Jewish owners replaced.”¹⁸⁰

2.c.11 Alongside the bans and prohibitions issued by central government, there were also ones decided by the **local authorities.** In July 1940 the Commission for Public Security in Abbazia informed the wives of the Jewish businessmen who had been arrested as foreigners and Jewish businessmen who had not been arrested that, by order of the Prefect of Fiume, they had to liquidate their businesses within a few days. On 6 October, the Prefect would order the closure of such businesses “until further notice”¹⁸¹ (see also the case of Bolzano in **2.c.1**).

¹⁶⁸ Local Police Chief in Ragusa to Personnel Offices, 19 July 1941, quoting a circular from the Ministry of the Interior of 10 July 1941, cited in: Liceo scientifico statale di Vittoria, *Campagna razziale cit.*, p. 109. See S. Caviglia, *Un aspetto sconosciuto cit.*, pp. 249-250.

¹⁶⁹ Circular from Ministry of the Interior, 5 September 1941, summarised in a ministry document quoted in *ibid.*, p. 269.

¹⁷⁰ Circular from Ministry of the Interior, 22 October 1941, summarised in a ministry document quoted in *ibid.*, pp. 262-263.

¹⁷¹ Circular from Ministry of the Interior, 29 March 1942, summarised in a ministry document quoted in *ibid.*, p. 264.

¹⁷² Circular from the Police Chief in Florence “on the basis of recent ministerial directives”, 21 June 1942, quoted in V. Galimi (ed.), *“Gli ebrei non possono”: esempi di divieti*, in E. Collotti (ed.), *Razza e fascismo cit.*, II, p. 61.

¹⁷³ Annotations summarising anti-Jewish directives, drawn up by the Ministry of the Interior presumably in April 1942, quoted in M. Sarfatti, *Documenti della legislazione antiebraica. Le circolari*, cit., pp. 186-187 (it is not known if these directives were issued by the Ministry of the Interior or the Ministry of Corporations).

¹⁷⁴ E. F. Sabatello, *Aspetti economici cit.*, pp. 262-263.

¹⁷⁵ President of the Union of Italian Jewish Communities to the Ministry of the Interior, 12 August 1940; quoted in S. Caviglia, *Un aspetto sconosciuto cit.*, p. 247.

¹⁷⁶ Police Chief in Florence to Personnel Offices, 10 December 1942, quoted in V. Galimi (ed.), *“Gli ebrei non possono” cit.*, p. 62.

¹⁷⁷ ACS, *MI, Demorazza*, b. 2, fasc. 9, sfasc. 8, note from the Director of the Head Office for Demography and Race to the Undersecretary of the Interior, with written annotations by the recipient dated 9 April 1939.

¹⁷⁸ ASBI, *Raccolta della normativa interna*, Governor of the Banca d'Italia to its branches, 17 November 1938; see also the chapter “Banca d'Italia”.

¹⁷⁹ ACS, *MF, SBE*, b. 19, fasc. 26, Head Office for Demography and Race to Ministry of Corporations and Ministry of Finance, 4 March 1940 (copy).

¹⁸⁰ *Ibid.*, Minister of Finance to Head Office for Demography and Race, 6 June 1940.

¹⁸¹ ACS, *MI, DGPS, div. AAGRR*, A 16, foreign Jews, b. 10, fasc. 31/1, protest from the Jews in Fiume entitled “L'attuale situazione degli Ebrei nella provincia del Carnaro” (copy; p. 7); *ibid.*, Prefect of Carnaro to the Head Office for Public Security, 16 September 1940, p. 3; ACS, *MI, DGPS, div. AGR*, 1940, b. 10/F, fasc. “Razzismo”, sfasc. “Fiume”, Prefect of Carnaro to Ministry of the Interior, 16 October 1940.

2.c.12 In May 1941 the Ministry for Currency and Foreign Exchange decided “to exclude all companies with owners of the Jewish race from the division of the **import quotas** and from the allotment of any imports.”¹⁸² Similarly, all such companies - even those belonging to Jews enjoying “discriminatory” exemption¹⁸³ - were “excluded from being issued with export licences.”¹⁸⁴

As far as the **replenishment of supplies** was concerned, a witness summarised the situation thus: “In the commercial field, when the issuing of race certificates came into force, the [Jewish] wholesalers in the clothing field were no longer able to obtain supplies freely; they had to obtain the authorisation of the *Comcordit*. Later, in the clothing field, when there was talk of stockpiling, special lists of wholesalers were drawn up, from which were excluded all those owned by Jews, even those with “discriminatory” exemption and those businesses which had become limited companies. This measure, however, remained ‘on paper’ because the measures regarding stockpiling still hadn’t come into effect on 25 July 1943.”¹⁸⁵ In a letter of April 1943 regarding this latter regulation, the Minister of Corporations specified “the activity of Jewish retail companies [in the textile sector] can, however, be tolerated when their character as such is not publicly obvious.”¹⁸⁶ In April 1942, all Jewish businessmen – including those with “discriminatory” exemption – were excluded from the “division of the supplies of products required for agriculture.”¹⁸⁷

2.c.13 All persons of “Jewish race” were forbidden to continue as members of **co-operatives** (September 1939; the capital they had paid in was repaid to them).¹⁸⁸ Furthermore, they could not advertise their businesses in the national press, obtain **licences for mineral surveys and prospecting**, be registered as authorised **maritime agents**, or **raise homing pigeons**.¹⁸⁹ Upon suggestion from the Head Office for Demography and Race, on 19 October 1940 the Ministry of Finance would issue a ban on all Jews – even those with “discriminatory” exemption – working as **clearing agents** or in any other activity involving customs duties.¹⁹⁰

2.c.14 Alongside the cession or end of businesses due to specific bans there were also those that resulted from other measures – for example, the internment (in June 1940) of all foreign Jews and of those Italian Jews known to be anti-fascists, or again the introduction of “obligatory labour” measures in May 1942.¹⁹¹

2.c.15 The prohibitions and limitations also concerned the **credit** extended to companies – or at least influenced the decisions in this area made by banks (see, **2.e**).

In April 1939 the Head Office for Demography and Race would, after coming out against the concession of subsidies to “Jewish farmers” by the Ministry of Agriculture and Forests, also express itself contrary to the granting of loans from the latter to the former.¹⁹²

On 28 September 1938, the Inspectorate for the Defence of Savings and the Provision of Credit exhorted at least one bank “of national importance” not to concede loans to Jews “in all those cases

¹⁸² AS Confindustria, *Circolari*, Fascist Confederation of Industrialists to the national federations belonging to that category, 13 May 1941.

¹⁸³ *Ibid.*, Fascist Confederation of Industrialists to the national federations belonging to that category, 16 June 1941, with notification that the ministerial circular was dated 29 May.

¹⁸⁴ *Ibid.*, Fascist Confederation of Industrialists to the national federations belonging to that category, 11 June 1941 and 16 June 1941.

¹⁸⁵ M. Tagliacozzo, *Metà della vita. Ricordi della campagna razziale 1938-1944*, Baldini e Castoldi, Milan 1998, p. 62.

¹⁸⁶ ACS, *MF, SBE*, b. 23, fasc. 55, Ministry of Corporations (Special Office of the Commerce Department) to the Ministry of Finance and other ministries, 15 April 1943.

¹⁸⁷ Summary of the anti-Jewish directives, drawn up by the Ministry of the Interior presumably in April 1942, quoted in M. Sarfatti, *Documenti della legislazione antiebraica. Le circolari*, cit., p. 196.

¹⁸⁸ ACDEC, *Nuove accessioni*, National Fascist Organisation of Co-operatives (Provincial Secretary in Udine) to the co-operatives in that province, 29 September 1939.

¹⁸⁹ Summary of the anti-Jewish directives, drawn up by the Ministry of the Interior presumably in April 1942, quoted in M. Sarfatti, *Documenti della legislazione antiebraica. Le circolari*, cit., pp. 187, 195.

¹⁹⁰ ACS, *MF, SBE*, b. 19, fasc. 37, Ministry of Finance (Head Office for Customs Duties and Indirect Taxation) to local revenue offices, 19 October 1940 (copy).

¹⁹¹ As note 108.

¹⁹² ACS, *PCM, 1937-39*, fasc. 3-2/2, n. 5441, b. 2297, sfasc. 22, Head Office for Demography and Race to the Presidency of the Council of Ministers, 8 April 1939.

where [the money] would seem to be intended for speculation.”¹⁹³ On 21 November 1938, the chief executive of the same bank would invite the branch managers not to grant more credit to “foreign Jews destined to leave our country”, and to recover any outstanding credit these currently enjoyed; with regard to the rest of the “Jewish clients”, he told the managers not to “enter into new relations, of either uncovered or guaranteed credit [...] until the exact extent and scope of the economic measures relating to them have become clearer.”¹⁹⁴ On 10 January 1939 another bank invited its employees to give the “race of the applicant in the information regarding all proposals or communication of bank credits”; ten days later, it would point out that such information did not have to be given in the case of “Aryan” clients.¹⁹⁵ In the summer of 1941 the same bank ordered the end of all “lines of credit extended to Jewish companies that work in the export field” (see **2.c.12**).¹⁹⁶

2.c.16 The introduction of persecutory statutes also resulted in the need for those subject to them to **sell off shop stock** (either prior to emigration or due to bankruptcy, the withdrawal of licences, etc.). In some cases, the shops that remained open were the object of **vandalism and looting**. In Trieste, it has been recalled that when there were such sales “many people stocked up at the shops of ‘Jews’, who on such occasions ceased to be thieves.”¹⁹⁷ There is record of violence and looting against Jewish shops in Ancona (May 1940), Pisa (October 1942) and Trieste (May 1943).¹⁹⁸

2.c.17 As for the c-category businesses, the **closures** (for whatever reason) that took place between the end of 1938 and the summer of 1943 were presumably equal - or superior in number – to a third of the total such businesses registered in censuses; sometimes, they may even have involved more than one half of them.

Of the 68 c-category businesses listed in Ancona, 29 were struck from the list in the period between October 1939 and September 1940, either because given away, sold, closed down or transformed into limited companies;¹⁹⁹ of those which were closed down, 8 were itinerant vendor businesses, whose owners had lost their licences on 17 August 1940.²⁰⁰ Of the 56 c-category business listed in Bologna, at least 21 closed down, and at least 3 were given away (or turned into limited companies) before September 1943. Within that four-year period, at least 7 companies’ applications for registration were turned down because of “opposition expressed by the Ministry of the Interior.”²⁰¹ In Cuneo, of the 22 businesses identified (14 of them included in the census), 12 would – between January 1939 and 1942 – be given away, ceded or closed down due to emigration or loss of licence (one other business was obliged to cease combining the trade in jewellery with that in clocks).²⁰² In Gorizia, of the 11 businesses owned by Italian Jews and the 3 owned by stateless Jews, those which would either close down or change hands in the period 1939-1940 included: a clock merchant/jeweller’s; a wine shop; a wholesale wine business, a café; a construction company; one itinerant vendor and a furniture-making business (in 1943 a commercial agency would also close down).²⁰³ In Turin, from 1938 to 1939 the businesses owned by Jews dropped in number by 15%, and the total number of their employees by 21%.²⁰⁴

¹⁹³ ASBCI, *Carte di Raffaele Mattioli*, A-Z, cart. 13, Head of the Inspectorate for the Defence of Savings and the Provision of Credit to the Chief Executive of the BCI, 28 September 1938.

¹⁹⁴ ASBCI, *Copialettere di Raffaele Mattioli*, vol. n. 11, Chief Executive of the BCI to branch managers, 21 November 1938.

¹⁹⁵ ASBNL, Head Office to branch managers, 10 January and 20 January 1939.

¹⁹⁶ ASBNL, internal circulars, 30 June and 4 July 1941.

¹⁹⁷ G. Volli, *Trieste 1938-1945*, in G. Valabrega (ed.), *Gli Ebrei in Italia durante il fascismo*, Quaderni del Centro di documentazione ebraica contemporanea, n. 3, Milan 1963, p. 43.

¹⁹⁸ M. Sarfatti, *Gli ebrei nell’Italia cit.*, pp. 201-203.

¹⁹⁹ A. Martellini, *Il feudo cit.*, p. 64.

²⁰⁰ CCIAA, Ancona, documentation sent to the Commission.

²⁰¹ ASBo, *Prefettura, Ufficio amministrazione beni ebraici*, b. 4, fasc. 3, “Elenco ditte ebee della provincia di Bologna”, drawn up after 26 October 1943.

²⁰² ISRCn, *Camera di commercio*, documentation sent to the Commission, various documents; ASCn, Prefecture, various documents.

²⁰³ ASGo, *Camera di commercio*, b. 127, fasc. 597, “Elenco delle aziende appartenenti a cittadini di razza ebraica.”

²⁰⁴ D. Adorni, Giuseppe Genovese, *La persecuzione contro le proprietà cit.*, p. 139.

2.c.18 Share capital and stock companies were not subject to specific regulations of a general kind; though the latter could not – if of importance to national defence or employing more than 100 workers – have Jews who did not enjoy “discriminatory” exemption as administrators, managers or auditors (see **2.b.5**). When rdl 1728/1938 was being drawn up it was considered that the overall share capital possessed by Jews in any company might be limited to one third, and that their voting powers in shareholders meetings should be limited to 49% or 33%. However, these proposals were ultimately abandoned.²⁰⁵

Nevertheless, various documents do reveal that enquires were carried out into the “race” of shareholders; and in some cases (non public) action was taken to limit the activity of those who were non-Aryan. For example, we know that on 19 December 1938, the National Institute for Foreign Exchange applied successfully to the Ministry of the Interior for authorisation to “establish whether those whose names figure as part of certain Italian companies and businesses belong or do not belong to the Jewish race.”²⁰⁶ In January 1939 the Head Office for Demography and Race informed the Ministry of Corporations on the “race” of the administrators, managers and employees of one particular company; with regard to the shareholdings in that company, it observed that “even if most of these were bearer shares, there is good reason to believe that the majority of [the stock capital] is in the hands of those of Aryan race.”²⁰⁷ It is also known that in February 1939 the Undersecretary at the Ministry of the Interior decided that “limited companies whose stock capital is not entirely in Aryan hands are to be excluded from State supply contracts and especially from contracts regarding supplies to the Ministry of the Interior;” opposition from the Ministry of Corporations does not seem to have resulted in him changing this ruling.²⁰⁸ Furthermore, it is also known that, in July 1940, this same Undersecretary would include within the ban regarding the activities of Jews within show-business and entertainment (see **2.b.12**) a prohibition on Jews owning shares in any company that ran cinemas.²⁰⁹ In the extant documentation from the Head Office for Demography and Race there is a hand-written note, datable between January and October 1940, which deals with the “The obligation on Jews to report the possession of registered or bearer shares in limited companies.”²¹⁰ However, we do not yet have the documentary evidence which shows how this proposal was then developed or that link it in any way with the subsequent rdl 1148/1941, which made it obligatory for all company shares and bonds to be registered.

The 1938 decision to issue various norms and regulations regarding the administrators of limited companies but not the possession of shares therein is presumably to be seen in relation to general government considerations regarding the overall economic situation in the country. Whilst looking forward to more detailed specific studies of this question, it does seem to be legitimate to conclude that Fascism was concerned not only to avoid undermining the legal guarantees of private property, but also to prevent “imbalance and repercussions” within the Italian economy and the “flight abroad of Jewish investment capital.” Hence its decision to place “Jewish-owned capital under strict Aryan control, at the service of the nation”, proceeding with caution and by gradual steps towards the goal of “reducing [...] or eliminating altogether the involvement of the Jews and the collaboration of Jewish technicians and professionals.”²¹¹

But the State was not the only body to enquiry into the “race” of shareholders. With regard to at least one bank there is extant evidence of a call (in early 1939) upon branch managers to investigate

²⁰⁵ M. Sarfatti, *Mussolini* cit., pp. 57-59, 63, 68.

²⁰⁶ ACS, MI, DGPS, div. AAGGRR, *Massime* (part not yet catalogued), R9, fasc. 6, National Institute for Foreign Exchange to Head Office for Public Security, 19 December 1938, with written annotations by the recipient.

²⁰⁷ AR Valle d’Aosta, *Prefettura*, cat. 14.1, Head Office for Demography and Race to the Ministry of Corporations, 24 January 1939.

²⁰⁸ ACS, MI, *Demorazza*, b. 8, fasc. 32, sfasc. “Accertamento delle Soc. Anonime dal punto di v.[ista] razziale”, various documents.

²⁰⁹ *Ibid.*, b. 2, fasc. 5, note from the Director of the Head Office for Demography and Race to the Undersecretary of the Interior, with written annotations by the recipient dated 10 July 1940.

²¹⁰ *Ibid.*, b. 8, fasc. 32, sfasc. “Provvedimenti per le anonime”, handwritten note containing three possible suggestions for the provisions.

²¹¹ *Ibid.*, b. 8, fasc. 32, memo from the end of 1938/beginning 1939 regarding the “problem of wholesale companies and large retail businesses owned by Jews, particularly in the textiles field” (source of the first two quotes); ASTs, *Prefettura, Gabinetto*, b. 363, report on the “Aryanisation of Jewish Businesses”, drawn up in Trieste at the end of 1938 (source of the last two quotes).

“the extent of Jewish involvement in the capital, administration and management of companies” when considering the extension of a credit line thereto.²¹²

In Trieste there is documentation regarding 149 changes in the composition of companies in the period August 1938 - October 1939; most of these concerned the boards of limited companies and were brought into effect either in anticipation of – or in conformity to – the norms regarding administrators of “Jewish race”.²¹³

It is however difficult to give a full account of the sales of (majority or minority) shareholdings in the years 1939-1943. One case in which a limited company was certainly sold off cheap can be identified in February 1939; this involved a medium-sized engineering company whose majority shareholders were a Jewish family and whose main area of production was military supplies (on the basis of thirty years of figures, such products can be said to have accounted for 60% of the company’s output).²¹⁴ Another sale regards the shares in a spinning mill which a Jewish stockholder had accumulated since the end of 1937; at the beginning of 1939 he sold off his holding in preparation for leaving Italy (though one cannot say if the price paid was fair or not, it is true that after the war the shareholder tried, unsuccessfully, to have the sale invalidated).²¹⁵

2.D. RESTRICTIONS AND LIMITATIONS ON THE OWNERSHIP OF REAL ESTATE

2.d.1 The revocation of residence permits granted to the vast majority of foreigners of “Jewish race” (see **2.b.1**) meant that these latter had to sell off their real estate urgently.

2.d.2 As already mentioned (see **2.c.2**), on 19 November 1938 the Minister of Justice ordered all notaries to “abstain” for the moment from stipulating any contracts of **sale or purchase** regarding real estate that involved persons of “Jewish race”. On the 11 February 1939 the ban was extended, for those not enjoying “discriminatory” exemption, to last until the full identification of the real estate in which they might have even just a part share (this operation was completed in the second half of that year, see **2.a.4**). However, such people were allowed six months to donate this property to spouses or descendants – not “of Jewish race” – or to educational bodies or institutions providing social assistance.²¹⁶

2.d.3 In November 1938 it was laid down (the necessary regulations were completed in February 1939) that Italians “of Jewish race” not enjoying “discriminatory” exemption could not own **land** whose overall rateable value was more than L. 5, 000 **or buildings** whose overall rateable value was more than L. 20,000 (see **2.a.4**). With regard to property of either kind that exceeded these limits, the rdl 126/1939 laid down the following: **I.** The division between the land and buildings within the “allowed” limits and those which exceeded them was to be made by the technical departmental of the land revenue assessment offices; those shares which exceeded the limits were to be transferred to a specially set up body for the management and liquidation of real estate (EGELI), which would be responsible for administering and selling this property on behalf of the State (perhaps delegating to certain land credit banks).²¹⁷ **II.** The price of the expropriation was obtained automatically by multiplying the rateable value of land by a factor of 80 and that of buildings by a factor of 20; possible appeals by Jews against the prices thus obtained would be examined by a committee which “will proceed to the direct evaluation of the real estate with regard to the average prices over the last five years, net of the tax rate of 20%.”²¹⁸ **III.** The compulsory purchase price was to be paid to the Jewish owner by the EGELI in the form of “special thirty-year certificates”, which were registered and yielded an annual interest of 4 per cent, paid in six-monthly instalments (these certificates could be transferred “between living subjects” if the recipient too was Jewish;

²¹² ASBNL, Head Office to branch managers, 10 January 1939.

²¹³ E. Ginzburg Migliorino, *Note sugli esiti cit.*, pp. 317-335.

²¹⁴ I. Pavan, *I beni industriali ebraici dalle leggi razziali ai processi di reintegrazione del dopoguerra: il caso di Federico Jarach*, in *Mezzosecolo*, n. 12 (1997-1998), pp. 343-373.

²¹⁵ *Foro italiano*, 1951, Parte prima, p.1003, Biella Law Courts, Ruling of 1 March 1950.

²¹⁶ Rdl 126/1939 (art. 5, 6).

²¹⁷ Rdl 126/1939 (art. 11, 12, 19, 26).

²¹⁸ Rdl 126/1939 (art. 20, 23, 24).

otherwise, such transfer was allowed only in a very limited number of circumstances, with the certificate then becoming non-nominative and payable to the bearer). At the end of the thirty-year period, the certificates would be replaced by registered consolidated debt bonds.²¹⁹ Where it was not possible to separate the “allowed” quota of real estate from that which exceeded the limits, the entire property was classified as doing so, and the EGELI paid in cash for the part that fell within the allowed limits.²²⁰ V. The procedure was halted and annulled should the owner obtain “discriminatory” exemption, should he lose his Italian citizenship or should ownership be inherited by a person not subject to the law; in such cases, if the sale had already gone ahead, the compulsory purchase price was paid in cash.²²¹ On 22 May 1940, the measure was extended to apply also to stateless Jews.²²²

Which land credit banks would be EGELI delegates with responsibility for specific geographical areas was decided in June 1939. They were the following: Credito Fondiario dell’Istituto San Paolo di Torino (for Piedmont and Liguria); Credito Fondiario della Cassa di Risparmio delle Provincie Lombarde (Lombardy); Istituto di Credito Fondiario delle Venezie in Verona (Veneto, provinces of Trieste, Pola and Fiume); Credito Fondiario della Cassa di Risparmio di Gorizia (for that province); Istituto di Credito Fondiario della Regione Trentina (Bolzano and Trento); Credito Fondiario della Cassa di Risparmio di Bologna (Emilia); Credito Fondiario del Monte dei Paschi di Siena (Tuscany); Credito Fondiario della Banca Nazionale del Lavoro (Marche, Umbria and Abruzzo); Istituto Italiano di Credito Fondiario (Lazio and the province of Zara [Zadar]); Credito Fondiario del Banco di Napoli (Campania, Puglia, Lucania, Calabria); Credito Fondiario Sardo (Sardinia); Credito Fondiario del Banco di Sicilia (Sicily).²²³

As already mentioned, at the end of June 1939 the Minister of Finance had “very approximately” given the following figures for the individual ownership of land or buildings which exceeded the established limits: with regard to the former, this was put at a total rateable value of L. 4,210,556, with regard to the latter L. 25,027,399. Applying the multiplication factors, this gives overall compulsory purchase prices of L. 336,844,480 for land and L. 500,547, 980 for buildings (see **2.a.4**). By 31 December 1943 the registered ownership of land and buildings that exceeded the allowed limits amounted to more than 726 million lire (little significant change to that figure had occurred during the second half of that year). Having detracted the property which belonged to those enjoying “discriminatory” exemption or that which had been given away on time, etc, this left a figure of more than 272 million lire.²²⁴ At the end of a complex bureaucratic procedure,²²⁵ the technical departments of the revenue assessment offices passed on to the EGELI 401 cases involving property of a total value of around 170 million lire. The EGELI then completed the purchase procedures for 265 of these (evaluated overall at L. 55,632,217); again by December 1943, it had completed the sale of individual property holdings for which it had paid the former owners a total of L. 9,794,122.²²⁶ In return for such ‘costs’, the EGELI had received a total of L. 29,758,500 (gross) from the resale, with its specific costs limited to 220,774 lire.²²⁷

In April 1943 a lieutenant colonel informed Mussolini that he had offered the EGELI some 80,000 lire to buy a studio in Via Margutta, Rome, but that the Agency had asked for a price “several times higher” than that which had been paid to the former Jewish owner. For its part, the EGELI said “we already have various offers that are all higher, including one of L. 130,000; and it is likely that these

²¹⁹ Rdl 126/1939 (art. 32, 33, 35).

²²⁰ Rdl 126/1936 (art. 19, 37).

²²¹ Rdl 126/1939 (art. 30, 42).

²²² ACS, *MI, Demorazza*, b. 3, fasc. 4, sfasc. 6, Ministry of Finance to local revenue offices and land revenue assessment offices, 22 May 1940.

²²³ Decree by the the Head of Government, 9 June 1939.

²²⁴ EGELI, *Relazione al Minister of Finance sull’esercizio 1943*, Grafica moderna Giuliani, San Pellegrino 1944, p. 4; Id., “Egeli e la sua attività” typewritten report, San Pellegrino, May 1945, p. 3, copy conserved in ACDEC, *AG, AI*, fasc. “Egeli”.

²²⁵ See F. Levi, *I sequestri* cit., table on p. 52.

²²⁶ EGELI, *Relazione ...* 1943 cit., pp. 4-5; Id., EGELI cit., p. 3.

²²⁷ EGELI, *Relazione ...* 1943 cit., pp. 10-11.

offers are destined to go even higher.”²²⁸ In Milan, the “excess” property of one Jewish woman included parts of two buildings whose compulsory purchase prices were L. 160,000 and L. 520,000, with an estimated market price in 1940 (according to the land revenue assessment office itself) of L. 250,000 and L. 580,000, and a resale price in 1942 of L. 435,000 and L. 875,000.²²⁹

With regard to the multiplication factors of 80 for land and 20 for buildings, the Ministry of Finance would in 1944 point out that “naturally the legal values thus obtained were substantially lower than those which actually applied in 1939.”²³⁰ With regard to the interest rates paid by the “special certificates”, a Jewish observer would in the weeks before the definition of the law comment that “if the rate is not lower than 4%, it seems to me that on average - that is, levelling out the enormous differences in figures - the assets confiscated in each compulsory purchase will amount to about 50% of total value.”²³¹ In effect, without considering the relation between the figure on the certificate and the market value of the expropriated real estate, it should be pointed out that the thirty-five-year “City of Rome” bonds issued for sale in December 1938 had a nominal annual yield of 5% with an issue price that was 0.94 of face value, resulting in “interest of around 5.30%, while the effective yield for the subscriber is 5.57%” – to which should be added the fact that lots were drawn to decide prizes worth a further one percent (and holders enjoyed total tax exemption on this income as well as thousands of free rail tickets for Rome).²³²

In October 1944, the Union of Italian Jewish Communities informed the government of the liberated part of Italy that the nominal yield of 4 per cent “had now – thanks to the burdens of the R.M. tax, the tax on property, the contributions to social assistance, etc - been reduced to a bare 2.75%”;²³³ in April 1945, the government raised the yield to 5%, to apply retroactively.²³⁴

2.d.4 Alongside these legislative norms there were also some measures taken by local authorities. In 1939, for example, the Prefect of Trieste requisitioned for local military command posts a number of villas owned by Jews, who could not (see **2.c.4**) stipulate rental contracts for this use of these properties.²³⁵

2.E. CENSUSES OF BANK ACCOUNTS. CURRENCY AND CUSTOMS RESTRICTIONS AND LIMITATIONS FOR THOSE LEAVING THE COUNTRY.

2.e.1 In September 1938 various commercial and currency restrictions were introduced regarding those **foreign Jews who had lost right of further residence in the country** (see **2.b.1**). Commercial exportation of goods by such people was subject to various restrictions, and they were obliged to pay down an “adequate” deposit that would serve as a guarantee; measures were taken to evaluate the contents of their bank accounts.²³⁶ A census was also instituted regarding their export operations which had not yet been covered by the payment of currency.²³⁷ Furthermore, it was laid down that – along with the “normal” allowance of currency at the moment of leaving the country (L. 2,500 for each person over ten years old)²³⁸ – all **foreign Jews emigrating from Italy** would, prior to a special measure regarding the transfer of their property, receive solely “some periodic payment of currency against the value of their business activities here, so that they can – within

²²⁸ ACS, *MF, SBE*, b. 19, fasc. 45, various documents.

²²⁹ AS Cariplo, *Egeli*, fasc. Vittoria Cantoni Pisa.

²³⁰ ACS, *MF, SBE*, b. 11, fasc. s.n., Ministry of Finance (Head Office for Personnel and General Affairs) to the Minister of Finance, 20 June 1944.

²³¹ V. Foa, *Lettere della giovinezza. Dal carcere 1935-1943*, Einaudi, Turin 1998, p. 541 (letter of 2 January 1939).

²³² ASBCI, *Circolari*, [Stock Exchange and Shares], 1938, circular n. 1400, 15 December 1938.

²³³ AUCEI, *UCII 1933-1947*, b. 65A, fasc. “Reintegrazioni patrimoniali e funzionari” [Restitution of Property and Employment], President of the Union of Italian Jewish Communities to the Italian Cabinet, 31 October 1944.

²³⁴ dlgs 12 April 1945, n. 222 “Norme complementari [...]” for the restitution of property to Italian and foreign citizens whose property rights were injured by racial measures (art. 13).

²³⁵ S. Bon, *Gli ebrei a Trieste* cit., p. 272.

²³⁶ ACS, *INCE*, b. 81, fasc. 3.1, circular to banks licensed for foreign currency exchange, n. 194, 12 September 1938.

²³⁷ *Ibid.*, circular to banks licensed for foreign currency exchange, n. 197, 21 September 1938.

²³⁸ ACS, *MI, Demorazza*, b. 4, fasc. 15, memo entitled “Misure di carattere valutario adottate o da adottarsi in relazione ai recenti decreti a tutela della razza”; the memo is undated but in many ways is similar to the memo “Provvedimenti per la difesa della razza”, dated 21 September 1938, sent from the Agency Office of the Credito Italiano in Rome to the executives of that bank (ASULI, *Credito Italiano (1895-1998), Direzione centrale, Contenzioso*, sacco 2, pacco 11/b – provisional labelling).

very modest limits – meet the primary needs of life in their new place of residence.”²³⁹ An internal memo recalls that the clandestine exportation of lire or foreign currency was punishable by the sequestration of the money and the expulsion of the culprit; that it had been judged of little use “to subject to restriction” the movement of funds between/within banks; that there had been more intensive “personal searches of travellers leaving the country” and more “controls” of postal packages being sent abroad.²⁴⁰

2.e.2 In October it was laid down that all **foreign Jews denied further right of residence** had to present themselves at the frontier with a declaration from the National Institute for Foreign Exchange regarding all their “commitments and credits deriving from business dealings with abroad”, as well as all the guarantees relating thereto;²⁴¹ subsequently, this measure would be extended to other **foreign Jews who were leaving the country for good.**²⁴² Furthermore, all their accounts and deposits were classified as “of foreign ownership” – a measure which meant they could only be used within the country itself and then only for specific types of investments (in real estate or otherwise), and for living expenses, etc. With the exception of the 5,000 lire per month allowed for these expenses, all use of these funds required the prior authorisation of the National Institute for Foreign Exchange.²⁴³

2.e.3 At the end of November 1938, the Inspectorate for the Defence of Savings and the Provision of Credit required the identification of “credit of whatever nature, apart from liabilities involving currency, [...] extended to **persons of Jewish race and foreign citizenship** resident in the Kingdom.”²⁴⁴

On 7 December 1938 the Inspectorate wrote directly to individual banks requiring that, within the context of a “general survey of the liabilities of Jews towards credit agencies”, it be informed of the “direct and indirect debts of their **Semitic clients of either Italian or foreign citizenship,**” urging the banks to indicate the names of those whom it had “a particular interest in preventing from leaving the Kingdom.”²⁴⁵

2.e.4. In January 1939 the following measures were laid down with regard to the transfer abroad of the assets owned by **foreigners of “Jewish race” denied the right of further residence in the country.** They had to give detailed proof of the legitimacy of their ownership then liquidate the property and deposit the overall amount realised in a “foreign Jew account” (only one per person) or in a “foreign Jew share portfolio.” Thereafter, following a complex procedure – in which the authorisation of the National Institute for Foreign Exchange was essential – they could organise the export of certain specific Italian products (the list included artistic ceramicware, building stone, perfumes, brooms, toys and ten other categories) towards countries with which Italy had not stipulated counterbalanced trade agreements (for example, France and the USA).²⁴⁶ Such goods were to be paid for in the following way: 40% by funds from the “foreign Jew account” and 60 percent by the deposit of foreign exchange (for which adequate guarantees had to be provided).²⁴⁷ Products exported in this way were excluded from “all the special conditions and facilities that might be extended to their normal exportation.”²⁴⁸ The “foreign Jew accounts” must also be used

²³⁹ ASBCI, *Circolari*, Borsa e Titoli (1938-39), circular to branches, 26 September 1938, enclosed is a copy of the communiqué from the National Institute for Foreign Exchange, n. 168162, 22 September 1938.

²⁴⁰ See No. 237.

²⁴¹ ACS, *INCE*, b. 81, fasc. 3.2, circular to banks licensed for foreign currency exchange, n. 202, 26 October 1938; ACS, *MI*, *DGPS*, *div.*

AAGRR, *Massime* (part not yet catalogued), S11, fasc. 87/6, Ministry of the Interior to Prefects, 22 October 1938.

²⁴² *Ibid.*, Minister for Trade and Currency to the Ministry of the Interior, 2 December 1938 and 9 January 1939 (copy).

²⁴³ ACS, *INCE*, b. 81, fasc. 3.2, circular to banks licensed for foreign currency exchange, n. 203, 27 October 1938; *Ibid.*, “Utilizzo conti loro vecchi”, 5 April 1938.

²⁴⁴ ASMP, *Sezione banca*, II/F/a/2, fasc. 5, cart. b, Fascist Confederation of Banks and Insurance Companies to banks, 30 November 1938.

²⁴⁵ ASMP, *Sezione banca*, II/F/a/2, fasc. 5, cart. c, Head of the Inspectorate for the Defence of Savings and the Provision of Credit to the *presidente-proveditore* [chief executive] of the Monte dei Paschi di Siena, 7 December 1938.

²⁴⁶ K. Voigt, *Il rifugio* cit., vol. I, p. 300.

²⁴⁷ ACS, *INCE*, circular to banks licensed for foreign currency exchange, n. 210, 24 January 1939; n. 227, 14 June 1939.

²⁴⁸ ACS, *INCE*, circular to banks licensed for foreign currency exchange, n. 213, 20 February 1939.

for the deposit of assets that accrued subsequently – for example, inheritances or the sums paid by insurance policies.²⁴⁹ As has been observed, “the transaction had to be carried out by an Italian export company, and obviously presumed that one had a foreign account – or else a foreign business partner or relative willing to advance the necessary foreign currency. The Milan Assistance Committee would, in collaboration with the ‘Joint’, search out buyers; it seems that it obtained from the government the permission to buy collectively under a lump-sum system. However, one cannot but agree with Walter Sholes, American Consul General in Milan, that the merchandise thus made available [...] was really warehouse leftovers which it would have been impossible to place on foreign markets; in effect, the Italian government wanted to increase its reserves of foreign currency whilst striking a blow against those who had promoted a boycott of Italian goods as a result of the government’s racial policies. It is not yet clear to what extent it was possible to exploit this procedure, in which the difference between domestic and export prices meant that losses could be anything between 20 and 60 percent. Many people would only manage to recover possession of their assets after the war, when they were severely devalued due to inflation.”²⁵⁰ In effect, the Committee for Assistance to the Jews in Italy (*Comasebit*) would in Milan, on 23 February 1939, make it known that it had obtained from the Ministry for Foreign Trade and Exchange permission to collect together the above-mentioned deposits owned by foreign Jews “with a view to an overall transfer abroad by means of merchandise.”²⁵¹ However, we do not know if – or to what extent - this measure was put into effect. Nor do we know if *Comasebit*, which was disbanded by the authorities in July 1939, was able to transfer this permission to the Delegation for Assistance to Emigrants (*Delasem*), which was set up the following December.²⁵² One can take as probable evidence of the difficulties encountered in such transactions the fact that five years later some “foreign Jew accounts” were still open in at least one bank (their contents would be confiscated by the authorities of the RSI).²⁵³

2.e.5 On 31 March 1939, the National Institute for Foreign Exchange ordered banks to immediately transfer into “non-transferable accounts or portfolios”, the “sums and shares belonging to **Italian citizens who have transferred their residence abroad**” (there was no mention of their “race”).²⁵⁴ Again, one can take as probable evidence of the difficulties in transferring this property abroad the fact that five years later some of these “non-transferable” accounts held in the name of Italian Jews were still open in at least one bank (their contents would be confiscated by the authorities of the RSI).²⁵⁵

2.F. RESTRICTIONS AND LIMITS REGARDING OTHER PROPERTY

2.f.1 After the approval (early September 1939) of the persecutory measures regarding foreign Jews and access to education, **vigilance at customs offices** was increased (see **1.e.1**). On 9 and 11 September, the Ministries of Finance and the Interior issued two independent circulars (via telegraph) regarding the intensification of customs controls.²⁵⁶ On the 10th and 11th of that month,

²⁴⁹ ASAAGG, documentation sent to the Commission.

²⁵⁰ K. Voigt, *Il rifugio* cit., vol. I, p. 301.

²⁵¹ ACDEC, AG, 8A1, fasc. “Comasebit”, sfasc. “Corrispondenza Comasebit Comunità israelitica di Modena”, Circular from the Committee for Assistance to the Jews of Italy, 23 February 1939.

²⁵² See M. Sarfatti, *Gli ebrei nell’Italia* cit., pp. 213-214.

²⁵³ ASBCI, *SFI*, ex-64A, Correspondence with branches, M-S, cart. 4, fasc. 3, three communications to the Head of Province in Milan regarding the balance in “Special Foreign Jews” accounts, 29 February 1944; *ibid.*, T-V, cart. 5, fasc. 11, communication to the Head of Province in Varese regarding the balance of various accounts including one “foreign Jews account”, 8 February 1944.

²⁵⁴ ACS, *INCE*, b. 81, fasc. 3.2, circular to banks licensed for foreign currency exchange, n. 219, 31 March 1939.

²⁵⁵ ASBCI, *SFI*, ex-64A, Correspondence with branches, A-I, cart. 3, fasc. 1, communication to the Head of Province in Alessandria of the balance in various accounts, including one “*untransferable* current account” in the name of an Italian Jew, 28 March 1944; *ibid.*, fasc. 7, communication to the Head of Province in Bologna of the balance in various accounts, including an “*untransferable* special current account” in the name of an Italian Jew, 29 September 1944; *ibid.*, M-S, cart. 4, fasc. 24, communication to the Prefecture in Rome of the balance in various accounts, including one “*untransferable*” account in the name of an Italian Jew, 28 February 1944.

²⁵⁶ ACS, *MI*, *Gabinetto*, *Ufficio cifra*, *Telegrammi in partenza*, Chief of Police to the Prefects in land border areas and the Commissioners of the Border Police, 11 September 1938; ASBI, *Direttorio-Azzolini*, cart. 9, Head Office for Customs Duties and Indirect Taxation at the Ministry of Finance to the Minister of Finance, 15 October 1938 (with references regarding the circular of 9 September); see also the chapter “The investigation in the Historic Archive of the Banca d’Italia”.

the former ministry would send at least another three telegrams on this subject to Prefects, Commissioners and Police Chiefs in border areas;²⁵⁷ the renewed vigilance also concerned the application of the new restrictions in the foreign exchange and trade fields (2.e.1). Between October and December the Ministry of the Interior informed Prefects of the possibility of foreign Jews using “transport on foreign cargo ships” to “elude the severe customs controls and possibly export currency and valuables;”²⁵⁸ it was pointed out that the Jews might achieve also this end by using marriage announcements in the *Corriere della Sera*²⁵⁹ or by exploiting “the self-interested services of some Vatican prelate, or even via certain religious institutions.”²⁶⁰ In December 1938 a legislative measure was passed regarding the repression of violations of the currency laws. Described as “pressing” and “of the utmost urgency”, this made no explicit reference to the government’s anti-Jewish policy and introduced much severer fines for offences that were now classified as crimes for which the culprit could be arrested (the measure also laid down the transfer to the State of all currency and gold thus sequestered).²⁶¹

According to a summary drawn up by the Head Office for Customs Duties and Indirect Taxation, the most important “sequestrations of currency and valuables” from people leaving Italy that were made in the period between mid-September and mid-October 1938 involved seven Jews, three apparently non-Jewish people and various others whose race is not defined.²⁶²

On 4 March 1939 the Minister of Education issued a circular entitled “Measures in Defence of the National Artistic Heritage in the Hands of the Jews”. This, “particularly considering the expulsion from the kingdom of foreign Jews,” invited all officials concerned in the granting of permits for the exportation of antiques and art objects to bear in mind the following points. **I.** “A rather broad evaluation of the value of the work [...] automatically leads to an extension of the area covered by the veto [on exportation].” **II.** What is more, “the evaluation given of the value of the work necessarily leads in an increase in taxation upon it – an increase which, in its turn, can serve effectively to delay requests for exportation.” **III.** Moreover, it was always possible to exercise the State’s recognised right of acquisition, bearing in mind “the limited financial resources available.”²⁶³ (On the transfer of currency abroad by foreign and Italian Jews leaving the country, see 2.e.4 and 2.e.5.). In transmitting this circular to the Office of the President of the Council of Ministers, the Head Office for Demography and Race mentioned that the Ministry of Education had urged the Ministry of Finance to “issue the necessary instructions to the Royal Customs Offices so that they would exercise the most rigorous vigilance regarding the imminent exodus of the Jews.”²⁶⁴

The circular of 4 March broadly repeated the reply sent on 5 January 1939 by the same Minister of Education in response to a letter of 19 December 1938 from the State Superintendent for Fine Arts in Trento, who “now found himself having to deal with some shipments containing various objects of noteworthy artistic interest.”²⁶⁵ In effect, shortly before or shortly after the above dates, a German Jew who had come to Merano from Germany in 1936 – and was now “obliged to leave the

²⁵⁷ ACS, *MI, Gabinetto, Ufficio cifra, Telegrammi in partenza*, Chief of Police to the Prefects in coastal border areas, to the Prefect of Milan and police stations in border areas, 10 September 1938; Chief of Police to the Prefect of Fiume, 10 September 1938; Chief of Police to local police chiefs in land border areas, 11 September 1938.

²⁵⁸ Ministry of the Interior to Prefects, 22 October 1938, quoted in: Liceo scientifico statale di Vittoria, *Campagna razziale* cit., p. 66.

²⁵⁹ Ministry of the Interior to Prefects, 24 November 1938, quoted in: Liceo scientifico statale di Vittoria, *Campagna razziale* cit., p. 76.

²⁶⁰ Ministry of the Interior to Prefects, 31 December 1938, quoted in: Liceo scientifico statale di Vittoria, *Campagna razziale* cit., p. 77.

²⁶¹ Rdl 5 December 1938, n. 1928, “Norme per la repressione delle violazioni delle leggi valutarie”; ACS, *PCM*, 1938-39, Ministry for Trade and Currency, fasc. 9, various documents.

²⁶² ASBI, *Direttorio-Azzolini*, cart. 9, Head Office for Customs Duties and Indirect Taxation at the Ministry of Finance to the Minister of Finance, 15 October 1938.

²⁶³ ACS, *PCM*, 1937-39, fasc. 3.2/2, n. 5441, sfasc. 18, Head Office for Antiquities and Fine Arts at the Ministry of Education to the Royal Offices for the Exportation of Antiquities and Works of Art, 4 March 1939.

²⁶⁴ *Ibid.*, Head Office for Demography and Race to the Presidency of the Council of Ministers, 16 March 1939.

²⁶⁵ ACS, *MPI, DGAABBA*, div. III, 1929-60, b. 253, fasc. “Esportazione oggetti di proprietà di famiglie ebraiche”, Director of the Superintendency for Fine Arts in Trento to the Head Office for Antiquities and Fine Arts at the Ministry of Education, 19 December 1938; reply from the latter, 5 January 1939.

Kingdom” – had requested permission for the export of various works of art (“paintings, miniatures and engravings, for which the required licence was granted upon payment of the export tax of L. 3,520, for objects of an estimated value of L. 44,000”).²⁶⁶ However, within his household effects he had also concealed other objects (69 pieces of eighteenth-century German porcelain, subsequently valued at L. 48,580). Following information from the Trento Superintendent of Fine Arts, the Director of the Merano Customs Office “subjected the household effects of Sig. Kaumheimer to a particularly thorough search in order to see if [these] might not be found hidden in some piece of furniture or a packing case.”²⁶⁷ Carried out twice over, the search turned up the objects and resulted in a fine for the owner and the confiscation of the porcelain.²⁶⁸

2.f.2 The **drop in share prices** resulting from the sales by Jewish shareholders (see **1.d.1**) would seem to have continued in the period immediately after the passing of the first persecutory measures.

In Trieste, where the Prefect ordered specific enquiries into the matter, in January 1939 the local Commander of the Carabinieri reported that “the sharp drop in the share price of insurance companies (Generali, Adriatica di Sicurtà) was due above all to the need for Jews, who held about 90% of the registered shares, to sell off their shareholdings in order to realise cash, which would be more difficult to keep under control should economic measures be taken against them;” however, it was also due to the changes in the management of these companies resulting from anti-Jewish policies. For his part, the Chief of Police said that the drop in the value of shares in insurance companies was due to “the fact that many Jews had got rid of most or all of their shares, whilst other shareholders – even those who were not Jewish – had followed the same policy solely because worried by the continual drop in the value of the shares themselves. Faced with such a glut, many of these shares have for some days been unable to find buyers.”²⁶⁹

2.f.3 On 2 September 1942 the Fascist Confederation of Banks informed its members that, in conformity with an opinion expressed by the Head Office for Demography and Race, the Ministry of Finance had forbidden all persons “of Jewish race” – whether Italian or foreign – from signing **stock contracts** “of a strictly speculative nature (net option contracts, contango agreements)” and had also forbidden “any Jewish household” from concluding “effective sales contracts” (with the sole exclusion of the purchase of State bonds) which exceeded the monthly limit of L. 100,000 (per household). In the following months the Confederation also informed its members that, by ministerial directive, the said limit should also cover dealings in “the shares in small companies that were not quoted on the stock exchange” (4 December 1942), “the renewal of existing contangos” (7 January 1943) and “the exercise and the sale of options” (10 May 1943) etc.; it was pointed out that Jews who enjoyed “discriminatory” exemption were not subject to these regulations (1 March 1943).²⁷⁰

2.f.4 Starting from June 1940, all those Jews present in Italy who were citizens of the countries upon which the Kingdom of Italy was declaring war became subject to the legislation and limitations that had been introduced regarding the citizens of enemy countries (as did the property in Italy of those Italian or non-Italian Jews who were resident in those States).

²⁶⁶ *Ibid.*, b. 234, fasc. “Esportazione clandestina di oggetti d’arte da parte del sig. Giulio Kaumheimer”, Royal Customs Offices of Merano, “Processo verbale definitivo di contravvenzione”, 6 February 1939, and other documents.

²⁶⁷ *Ibid.*, Director of the Superintendency for Fine Arts in Trento to the Head Office for Antiquities and Fine Arts at the Ministry of Education, 7 February 1939.

²⁶⁸ *Ibid.*, various documents, and A. Ziffer, *Le porcellane*, Museo provinciale d’arte, Trento 1991, pp. 9-10.

²⁶⁹ ASTs, *Prefettura, Gabinetto*, b. 363, Commanding officer of the Trieste group of the Legione Territoriale dei Carabinieri Reali di Trieste to the Prefect of Trieste, 2 January 1939; *ibid.*, the local police chief in Trieste to the Prefect of Trieste, 2 January 1939. See also S. Bon, *Gli ebrei a Trieste* cit., pp. 129-130.

²⁷⁰ ASBCI, *SFI*, Branch Office Archives, Florence branch, “Acquisti vendite titoli azionari [...]”, fasc. 3, sfasc. 1, circulars from the Shares and Bonds Office of the Banca Commerciale Italiana, 10 September, 24 November, 15 December 1942, 19 January, 22 February, 24 March, 25 May 1943, quoting the whole text of the circulars to banks from the Fascist Confederation of Banks and Insurance Companies, dated 2 September, 14 November, 4 December 1942, 7 January, 11 February, 1 March and 10 May 1943 respectively. A summary of the whole range of norms and regulations in ASBNL (Stocks and Shares Office), circular n. 150, 21 May 1943, documentation sent to the Commission.

As a result, measures were taken concerning the sequestration of **household effects and trunks** that had been stored by Jews in port warehouses. The openly anti-Jewish nature of these measures was clear in Trieste, where on 11 May 1943 the Prefect sequestered “the trunks and crates of household effects belonging to emigrant Jews [...] that now stand in the Magazzini Generali warehouses,” in so much as they are to be considered “the property of the enemy.”²⁷¹ All in all, there were some 667 crates, each measuring from 5 to 8 cubic metres and weighing from one to five thousand kilograms, with an overall insurance value (in 1939) of around sixty million lire. These generally contained the furnishings of entire apartments and had come from Germany and other European countries on their way to Palestine, America, Great Britain and the British Dominions.²⁷² In Genoa, during the “Forty-Five Days” of summer 1943, a Jewish assistance organisation would, in a letter regarding the baggage of a foreign Jew who had moved to live abroad, state that “the authorities responsible who gave the order for its sequestration have now released it.” and that the dispatch of the baggage to its owner was made easier by the fact that he “did not live in enemy territory.”²⁷³

2.G RESTRICTIONS AND LIMITATIONS CONCERNING SOCIAL SERVICES AND ASSISTANCE

Here, as yet incomplete research has brought to light the following measures (see also **2.b.15**).

2.g.1 In February 1940 the Head Office for Demography and Race pointed out to the Ministry of Popular Culture that the persons of “Jewish race” should address their **request for subsidies** “to the Jewish community, which by law is responsible for assistance to needy Jews.”²⁷⁴

2.g.2 In December 1940 the Minister’s Office at the Ministry of the Interior informed the Head Office for Demography and Race that “given the instructions received [...] Jews could not be registered in the **list of the poor** – that is, could not take advantage of public assistance.”²⁷⁵

2.g.3 At some time before 1942 “needy Jewish families” were excluded – except in some exceptional cases - from the “**winter assistance**” provided by the local council social services departments.²⁷⁶

2.g.4 A law of September 1940 put an end to the 11,500-lire State subsidy for Jewish kindergartens (retroactive to July 1938).²⁷⁷

2.g.5 In January 1940, the Office of the President of the Council of Ministers laid down that persons of “Jewish race” could not take advantage of the exemptions from **examination and diploma fees** that were available for the children of large families, for orphans, or for the children of those who had been disabled in the service of their country.²⁷⁸

2.g.6 The forms for the assignment of the **subsidized housing** provided by the Autonomous Fascist Institute of Genoa contained (in March 1941) the phrase “I declare that neither I nor my family are of Jewish race.”²⁷⁹ Presumably the same sort of declaration had to be made in other provinces of the country as well.

²⁷¹ Prefecture, Trieste, documentation sent to the Commission, fasc. “Ladislao Simon L.”, decree of the Prefect of Trieste n. 1100/12409, 11 May 1943.

²⁷² NA, *AMG, Italy*, 10000.167, fasc. 250, Bruno de Steinkuehl, “Report on the legal and financial situation regarding the various chests of household goods sequestered in accordance with the D. P. n. 1100/12409 of 11 May 1943” 25 August 1943 (copy), enclosed with the “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; *ibid.*, Bruno de Steinkuehl to the Prefecture of Trieste, 25 August 1944 (copy, enclosed like the above).

²⁷³ ACDEC, *Delasem-CRDE*, Delegazione per l’assistenza agli emigranti (*Delasem*) of the Union of Italian Jewish Communities to the *Verband Schweizerischer Juedischer Fluechtlingshilfen*, 29 August 1943.

²⁷⁴ ACS, *MI, Demorazza*, b. 8, fasc. 31, Head Office for Demography and Race to the Ministry of Popular Culture, 24 February 1940.

²⁷⁵ ACS, *MI, DG Amm. civ., Div. ass. e benef. pubbl. 1940-42*, b. 7, cat. 25274, fasc. 6, Chief of the Minister’s Office at the Ministry of the Interior to the Head Office for Demography and Race and the Head thereof, 16 December 1940.

²⁷⁶ Annotations summarising anti-Jewish directives, drawn up by the Ministry of the Interior presumably in April 1942, quoted in M. Sarfatti, *Documenti della legislazione antiebraica. Le circolari*, cit., p. 189.

²⁷⁷ L 1403/1940.

²⁷⁸ ACS, *PCM, 1937-39*, fasc. 3.2-2, n. 5441, sfasc. 32, Undersecretary at the Presidency of the Council of Ministers to the Ministry of Education, 22 January 1940.

²⁷⁹ ‘Per avere una casa Iacp giuro che non sono ebreo’, in *Il Lavoro*, Genoa, 14 April 1995.

2.g.7 In March 1942, the Ministry of the Interior laid down that the Jews must not be allowed to buy the **cheap, low-quality meat** available at the special outlet in Trastevere.”²⁸⁰

As early as the end of 1938, a leader of the Union of Italian Jewish Communities spoke of “the painful, needy state of many foreign Jews who have suddenly found themselves indigent; and one can already see such indigence looming in the future for Italian Jews subject to the recent measures.”²⁸¹ In 1942, the President of the Assistance Committee of the Jewish Community in Rome stated “the sufferings of our poor are not eased by the ten, fifteen or twenty lire that we are able to give them. Quite apart from the difficulties caused by these quotas, such people need everything – from clothing to bedding and mattresses. And very often they request financial help with back rent in order to avoid being evicted. Also we often have Jews from other communities who come to us to ask for the means to get back home – to say nothing of assistance to those who are subject to internal exile. And the list could go on and on.”²⁸²

²⁸⁰ ACS, MI, DGPS, div. AAGRR, *Massime* (part not yet catalogued), R9, fasc. 6, Chief of the Minister’s Office at the Ministry of the Interior to the Prefect of Rome, 18 March 1942.

²⁸¹ AUCEI, *UCII, Attività 1933-47*, b. 11D, fasc. 1938-39, sfasc. “Federico Jarach”, letter from Aldo Ascoli to Federico Jarach, 29 December 1938.

²⁸² Deputazione ebraica di assistenza e servizio sociale di Roma, *Curiosando ... nei verbali della deputazione dal 1886 al 1953*, Giuntina, Florence 1991, p. 166.