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MERLE A. WOLFSON  
LISA PALFY KOHN

January 29, 2004

RECEIVED

FEB 04 2004

LEGAL SERVICES

\* ADMITTED IN N.Y. ONLY

Holocaust Victims Assets Litigation  
P.O. Box 8300  
San Francisco, CA 94128-8300,

Re: Holocaust Victims Assets Litigation

Dear Sir:

Enclosed herewith please find an allocation proposal for the distribution of unclaimed residual funds from the Settlement Fund.

Very truly yours,

Robert A. Swift

RAS:pdw

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IN RE	}	Master Docket No. CV-96-4849
HOLOCAUST VICTIM ASSETS	}	(ERK) (MDG)
LITIGATION	}	

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**PROPOSAL OF CLASS COUNSEL FOR THE DISTRIBUTION  
OF RESIDUAL UNCLAIMED SETTLEMENT FUNDS**

The undersigned Co-Chair of the Plaintiffs' Executive Committee and Settlement Class Counsel submits the following plan for the distribution of unclaimed residual settlement funds, which are believed to be in excess of \$600 million.

**I. The Legal Framework for a Cy Pres Distribution**

The operative law in the Second Circuit is that money that cannot be distributed on a "claims made" basis to class members may be distributed in a mode that will "benefit" the class. *See In re Agent Orange Product Liability Litigation*, 818 F.2d 179, 185 (2d Cir. 1987). The \$205 million distributed so far to poor Russian Jews is not pursuant to a plan and not for the general benefit of the Looted Assets Subclass. It is a welfare payment. Under *Agent Orange*, there must be "equivalency," or at least "fluidity," between the class claiming injury and the class receiving a recovery. *Id.* Programs designed to assist the class may be funded with settlement proceeds. *Id.* The Court must designate and supervise specific programs that benefit the class. *Id.* An unassailable fact is that 424,000 persons submitted

detailed questionnaires claiming to be members of the Looted Assets Subclass. The proposed Plan will achieve equality, congruence, simplicity and speed in conferring benefits on the entire Subclass, including the 424,000.

## **II. Class Counsel's Plan**

### **A. Purpose**

Class Counsel proposes that surviving Holocaust survivors who are members of the Looted Assets Subclass receive reimbursement of medical expenses or medical insurance premiums up to \$1,000. Should the totality of settlement funds not be exhausted in two years, the maximum payment can be increased. The need for medical services is universal among Holocaust survivors because of their age. Medical services are delivered differently and compensated differently in all the countries where Holocaust survivors live today. Private medical insurance or government sponsored medical insurance plans exist in many countries. Even in countries with the best medical expense compensation plans, individuals have to pay a percentage of their medical costs, or higher premiums for coverage. Because the cost of medical services in Third World countries is relatively less than in developed countries, Subclass members residing in those countries may benefit the most. The Plan is simple, congruent with the members of the Subclass who are entitled to benefits, responds to a universal need, and eliminates cumbersome and expensive

distribution schemes. It also permits Subclass members to make their own choices as to medical services and medical insurance instead of having non-governmental organizations (“NGO’s”) make that choice for them.

**B. Eligibility**

The Settlement Agreement defines the Looted Assets Subclass as victims or targets of Nazi persecution whose assets were taken by the Nazi Regime. The Court has names and addresses of 424,000 persons who completed questionnaires asserting they are within that Subclass. These persons can be notified by regular mail of the availability of benefits to qualifying persons. NGO’s can notify other members of the Subclass who might be eligible. The Court should also seriously consider whether to disqualify persons who were recipients of goods and services from the prior distribution of \$205 million.

**C. Implementation of Class Counsel’s Plan**

Class Counsel propose to use accountants (and their non-accountant staff) to process applications for benefits in each country where there are a minimum of 1,000 Subclass members. Local accountants will have first hand knowledge of medical service providers and medical insurance in their country as well as language skills. Subclass members will complete a one page form (in their native language) limited to (1) eligibility questions and (2) the expense for which reimbursement is sought.

The back side of the document will explain the types of medical expenses reimbursable. Documentation supporting the expense will be required. The application will first be reviewed by the non-accountant staff which will recommend acceptance, rejection or the need for more information. An accountant will give final review. Twice monthly a central office in the United States will receive requests for payment from the accountant and disburse payment either directly or through the accountant in the native currency. The accountant will certify the accuracy of his processing activities to the central office. The central office will conduct periodic audits of the accountants and submit monthly reports to the Court.

### **III. Compliance with the Orders of November 17 and December 17, 2003**

The Court's Order of November 17, which specified required minimum criteria for the submission of a plan, is unfair and discriminatory. While the Court may suggest such criteria, it is a misuse of the Court's power to require that such criteria be met. The irony is that, while the Court needs the benefit of alternative funding proposals from all groups and individuals, groups or individuals without the means or research to meet the criteria will decline to make a submission or their submissions will be disregarded by the Court. By eliminating other submissions, the Court is necessarily advancing – if not preferring – the proposal of the Special Master which was developed at considerable expense to the Settlement Fund.

When the undersigned requested specific information from the Special Master for use in presenting a proposal, the Special Master declined to give any useful information. See attached. Although the Special Master's files should have been available to Class Counsel, nothing was made available.

Specific responses to the 6 specifications in the Court's Order of November 17, 2003 are as follows:

1. Class Counsel accept the estimates of the numbers and country locations of Holocaust survivors contained in submissions from the Special Master.
2. Class Counsel believes the Court is in error in focusing on "needy" Holocaust survivors when the entire Looted Assets Subclass should be eligible to benefit on an egalitarian basis from the distribution of unclaimed residual settlement funds.
3. The Plan assumes the universality of medical needs of the members of the Looted Assets Subclass. Longevity and relative poverty are irrelevant to the Plan proposed.
4. Distribution will be in country currencies by direct payment to members of the Subclass upon certification of the members' expenditures for medical services or medical insurance premiums. The program will last approximately 2 years, or until the settlement funds are exhausted. The cost of administration should be less than 1%

of the monies distributed. Notice of the availability of benefits will range between 1/2 to 1% of the monies distributed. This is consistent with the cost of class notice given in the Austrian Banks Settlement, which was less than \$3 million. Extensive and expensive newspaper advertisements can be minimized since there is already a database of 424,000 Subclass members.

5. Class Counsel does not recommend distribution by NGO's. A central office of 4 paid employees with administrative skills will coordinate with accounting firms in all countries for the certification and processing of benefits. NGO's will be asked to assist in notifying members of the Subclass of the availability of benefits, and will be compensated for photocopying and mailing expenses.

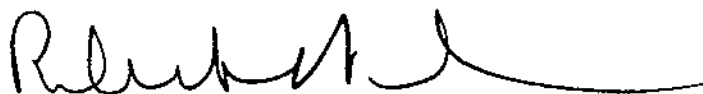
6. The undersigned Class Counsel, who individually represents over 50,000 Holocaust survivors and heirs, endorses this proposal on behalf of the entire Class.

#### **IV. Conclusion**

Unlike the previous expenditure of \$205 million for welfare payments to poor Holocaust survivors, who may not be Subclass members, the instant Plan makes available equal benefits to all persons who qualify as Subclass members. This Plan is fully consistent with the ruling in *Agent Orange*. Implementation requires the creation of a central office in the United States with several staff members, the engagement of accountants in multiple countries and the creation of a benefit form

in multiple languages. Documentation of medical expenses or medical insurance premiums should eliminate fraud. There should be little or no dispute over what is a proper medical expense or insurance payment. Importantly, the benefits can be distributed within a two year period.

January 29, 2004



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Co-Chair Plaintiffs Executive  
Committee and Settlement Class  
Counsel



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HAROLD E. KOHN  
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OF COUNSEL  
MERLE A. WOLFSON  
LISA PALFY KOHN

December 30, 2003

Special Master Judah Gribetz  
399 Park Avenue  
New York, NY 10022

In re Holocaust Victims Assets Litigation, No. CV-96-4849 (ERK)(MDG)

Dear Mr. Gribetz:

I write to request that you make available for my inspection and copying specific files that you have accumulated during your appointment as Special Master in the above matter. As you know from my submissions, I do not believe that your plan for distribution of the *cy pres* funds in the above matter complies with the Second Circuit Court of Appeals' legal standard set forth in *In re Agent Orange Product Liability Litigation*, 818 F.2d 179, 185 (2d Cir. 1987). I believe the *cy pres* funds must be distributed for the benefit of the Looted Assets subclass. Because your plan -- to make welfare payments to a designated group -- does not satisfy this standard, it is my intent to submit to the Court an alternative plan.

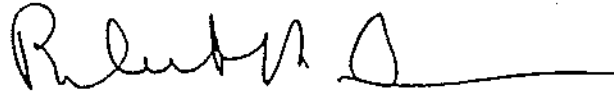
In order to submit an acceptable plan, I would like to review specific documents in your possession. Since those documents were created or obtained by you as part of your compensated duties for the Class, there should be no reason why the Class should not benefit from access to those documents. These documents are ones which contain:

1. Identification of persons and groups composing the Looted Assets Subclass.
2. Surveys of the needs of the members of the Looted Assets Subclass.
3. Distribution proposals for the benefit of the Looted Assets Subclass.

As you know, Chief Judge Korman has set a deadline of January 30, 2004 for submission of alternative plans of distribution. In order to comply with that date I would like to inspect the documents in your office no later than January 15, 2004. So that Chief Judge Korman can be aware of this request -- which is not to be confused with discovery -- I am copying him on the letter.

Please advise me at your earliest convenience when I may inspect the documents.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert A. Swift", followed by a long horizontal line extending to the right.

Robert A. Swift  
Co-Chair Plaintiffs Executive Committee

RAS:pdw

cc: Hon. Edward Korman

Judah Gribetz  
Special Master  
Holocaust Victim Assets Litigation

Case No. CV 96-4849  
399 Park Avenue  
New York, New York 10022  
Phone: (212) 207-1221  
Fax: (212) 750-9022

January 9, 2004

Robert A. Swift, Esq.  
Kohn, Swift & Graf, P.C.  
One South Broad Street, Suite 2100  
Philadelphia, Pennsylvania 19107-3389

Dear Mr. Swift:

I write in response to your letter dated December 30, 2003. To date, I have not received a copy of the letter that you sent me (perhaps because the firm name "Bingham McCutchen" was not included in the address; I suspect that this problem may have occurred in the past). However, Judge Korman called the letter to my attention and forwarded a copy to me on January 6, 2004.

Your letter notes that you "do not believe that [the] plan for distribution of the *cypres* funds in [this] matter complies with the Second Circuit Court of Appeals' legal standard set forth in *In re Agent Orange Product Liability Litigation*, 818 F.2d 179, 185 (2d Cir. 1987)" and that you "believe the *cypres* funds must be distributed for the benefit of the Looted Assets subclass." I believe that you have previously expressed this view, including at the November 20, 2000 hearing held by Judge Korman on what was then the Proposed Plan of Allocation and Distribution of Settlement Proceeds ("Proposal"). After considering all viewpoints, Judge Korman adopted the Proposal in its entirety on November 22, 2000.

As you are aware, one appeal from the Court's order was briefed and argued before the United States Court of Appeals. With respect to the Looted Assets Class, appellants "object[ed] to ... the application of the doctrine of *cypres* to resolve the claims of the 'Looted Assets' class, rather than require - or permit - claimants to put forth documentary evidence of their actual losses," *In re Holocaust Victim Assets Lit.*, 2001 WL 868507, \*2 (2d Cir. July 26, 2001).

The Second Circuit expressly rejected this challenge:

Finally, we assume that appellants' claim that they should be allowed to provide proof of their actual loss of property refers to claims of the "Looted Assets" class. While we find that their claim lacks legal merit, we note that counsel for the plaintiffs-appellees has indicated in the context of an unrelated appeal that members of the "Looted Assets" class may be able to file such documentary proof of actual losses with the German Foundation.

Id. The Second Circuit upheld the Distribution Plan in its entirety, including the *cy pres* remedy recommended for the Looted Assets Class, which relied upon appellate precedent to conclude that the class was too numerous to render individual relief to every member and that under these circumstances, it is "equitable to limit payment to those with the most severe injuries" and to "give as much help as possible to individuals who, in general, are most in need of assistance." Agent Orange, 818 F.2d at 158.

To the extent that your letter seeks the data upon which these Court-approved recommendations were based, I refer you to the following sections of the Distribution Plan:

- Description of and recommendations relating to the Looted Assets Class (Vol. I, pp. 21-27; 110-142);
- "Geographic Distribution of Initial Questionnaires" (Vol. I, Exhibit 3);
- "Hesed Questionnaire, List of Participating Service Agencies & Specific Funding Recommendations" (Vol. I, Exhibit 6);
- "Summary of Allocation Proposals" (Vol. I, Annex A);
- "Legal Principles Governing Distribution of Class Action Settlements" (including analysis of *Agent Orange* decisions) (Vol. I, Annex B);
- "Demographics of 'Victim or Target' Groups" (Vol. I, Annex C);
- "Heirs" (Vol. I, Annex D);
- "Holocaust Compensation" (Vol. II, Annex E);
- "Social Safety Nets" (Vol. II, Annex F); and
- "The Looted Assets Class" (Vol. II, Annex G).

If you no longer have your copy of the Distribution Plan readily available, the Plan and all exhibits and annexes remain posted at the Internet site for this matter, [www.swissbankclaims.com](http://www.swissbankclaims.com).

As the Interim Report explains, unclaimed residual funds may remain from the up to \$800 million allocated by the Court to the Deposited Assets Class. To the extent that such funds remain, the Interim Report recommends that these amounts be "re-allocated to the Looted Assets Class for distribution to needy Nazi victims in accordance with the *cy pres* principles governing the administration of that class." (Interim Report, p. 7). You indicate in your letter that you disagree with this recommendation and intend to submit to the Court an alternate plan. Your letter then sets forth three categories of documents which you state "were created or obtained by [me]" and states that you "would like to inspect the documents in [my] office by no later than

January 15, 2004" in order to comply with the Court's deadline for submission of distribution proposals of January 30, 2004. You list three types of information which you state you wish to "inspect": "identification of persons and groups composing the Looted Assets Subclass"; "surveys of the needs of members of the Looted Assets Subclass"; and "distribution proposals for the benefit of the Looted Assets Subclass." I address each of these categories in turn.

*a. "Identification of persons and groups"*

As to "identification of persons and groups," as you are aware, the Court-approved Distribution Plan explains the "identification" of the Looted Assets Class and the rationale for adopting a *cypres* remedy for the class. As stated in the Distribution Plan, the Looted Assets Class is enormous. It is comprised of virtually every "Victim or Target of Nazi Persecution," because every such person was looted, as well as their heirs. As the Distribution Plan observed:

[E]ven with unlimited time and funds to conduct further research, it will never be possible to recreate what was stolen or to retrace its path through Europe. Therefore, the Special Master's recommendation for the Looted Assets Class recognizes the unprecedented scope of the Nazi theft, coupled with the virtual impossibility of analyzing or even nominally compensating the material losses suffered by the Jewish, Roma, Jehovah's Witness, disabled and homosexual victims and communities plundered across wartime Europe. This is particularly so where, as here, there are literally hundreds of thousands of surviving Nazi "Victims or Targets" and millions of heirs who may claim membership in the Looted Assets Class, since it may be presumed that all were looted but very few if any can prove that their property is linked to a Releasee. (Distribution Plan, p. 23).

For this reason, as the Plan states (and as reiterated in the Interim Report), "[w]ere the Special Master to recommend that each claim be assessed individually – as in the case of the bank accounts, which still exist in Switzerland in an identifiable form accompanied by documentation – the result would be an unwieldy and enormously expensive apparatus to adjudicate hundreds of thousands of claims, for losses which can barely be measured and hardly be documented, and whose connection to Switzerland, or a Swiss entity, if ever it existed, probably can no longer be proven. Further, the administrative expense of such a process would unjustifiably deplete the Settlement Fund. Conversely, were the Special Master to recommend a *pro rata* distribution, with each of the approximately 424,000 individuals who have indicated that they are Looted Assets Class claimants (to date) receiving an identical distribution on the presumption that their plundered assets are traceable to Switzerland, or Swiss entities, each 'award' would total little more than a few dollars. This is obviously untenable." (Distribution Plan, at 115; Interim Report, at 86). The Plan further notes that the reference to 424,000 individuals was based upon the number of persons who had returned Initial Questionnaires indicating an intent to claim membership in the Looted Assets Class. (Distribution Plan, at 115,

n. 342). However, the Questionnaire stated on its face that it was not a claim form but merely an informal survey to assist the Court in formulating a distribution proposal. Therefore, the number of actual Looted Assets Class claimants – had there been an individualized claims process – likely would have been much greater than 424,000. Accordingly, the Court adopted and the Second Circuit upheld the *cy pres* remedy targeting assistance to the neediest members of the Looted Assets Class, wherever they may reside.

*b. "Surveys of needs"*

With respect to "surveys of the needs" of Looted Assets Class members, the Distribution Plan sets forth information pertaining to survivor needs available as of September, 2000, when the Plan was submitted. As described above, this information is described principally at pages 110-142 of the Plan, as well as the various annexes, including "Demographics of 'Victim or Target' Groups," "Social Safety Nets," "Holocaust Compensation," and "The Looted Assets Class."

Since September, 2000, additional information of course has been gathered in connection with survivor needs in implementation of the Distribution Plan. The October 2, 2003 "Special Master's Interim Report on Distribution and Recommendation for Allocation of Excess and Possible Unclaimed Residual Funds" ("Interim Report") describes the distributions that have been made to date, and annexes a number of exhibits relevant to the class, including information concerning survivor demographics and needs. These exhibits include recent submissions to the Court by the three organizations responsible for implementing the Court's directives with respect to this class: the American Jewish Joint Distribution Committee, the Conference on Jewish Material Claims Against Germany, and the International Organization for Migration. For specific information, I refer you to the following pages of the Interim Report:

- Overview of Looted Assets Class *Cy Pres* Remedy; Status of Distributions (Interim Report, pp. 85-106);
- "Documents relating to the Looted Assets Class (as administered on behalf of the Court by the American Jewish Joint Distribution Committee)" (Interim Report, Exhibit 10, pp. 2-59);
- "Documents relating to the Looted Assets Class (as administered on behalf of the Court by the Conference on Jewish Material Claims Against Germany)" (Interim Report, Exhibit 11, pp. 2-27); and

- “Documents relating to the Looted Assets Class (as administered on behalf of the Court by the International Organization for Migration)” (Interim Report, Exhibit 12, pp. 2-35).<sup>1</sup>

To the extent that there exists other data concerning survivor needs, it is precisely this type of information that the Interim Report, as adopted by the Court, is now actively soliciting from all interested parties as part of the Court's effort to formulate a plan for distribution of residual funds, if any. The Interim Report recommends that “any person or organization, including those currently operating under the auspices of the Court, wishing to deliver services to needy Nazi victims utilizing residual unclaimed funds file with the Court a detailed plan describing the nature of any proposed aid program, the size, location and nature of the benefited population, and a proposed budget describing administrative costs and the costs of service delivery.” (Interim Report, pp. 12-13). Moreover, as the Court's November 17, 2003 order adopting recommendations in the Interim Report makes clear, “any person or organization who seeks to offer a plan for providing assistance to needy Nazi victims shall file a proposal specifying at least the following information:

1. Number and location of Nazi victims for the proposed “Victim or Target” group to be served (e.g., Jewish, Roma, Jehovah's Witness, homosexual and/or disabled), including (a) estimates of victims in Israel, the Former Soviet Union, Europe (including nation-by-nation), the United States (including state-by-state); Australia; South America and elsewhere; and (b) source materials upon which the data is based, including any expert opinion(s) relied upon;
2. Number and location of needy Nazi victims among the proposed “Victim or Target” group to be served, in accordance with the criteria set forth in item 3 below, including (a) estimates of victims in Israel, the Former Soviet Union, Europe (including nation-by-nation), the United States (including state-by-state); Australia; South America and elsewhere; and (b) source materials upon which the data is based, including any expert opinion(s) relied upon;
3. Assessment of survivor needs, including (a) analysis of specific requirements (e.g., medication, food, nursing care), taking into account different social safety nets available by geographic location and availability of other sources of assistance; (b) survivor longevity estimates by geographic location; and (c) absolute and relative poverty levels by geographic location, specifying, among other data, national

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<sup>1</sup> With respect to the IOM, the Interim Report notes that “[g]iven the unexpected success in locating so many surviving Roma Nazi victims, in the event that residual unclaimed funds remain from the Settlement Fund, it may be advisable to reevaluate the original allocation formula recommended under the Distribution Plan (reserving 10% of the Looted Assets Class allocation for non-Jewish victims).” (Interim Report, p. 105).

statistics, United Nations and comparable non-governmental organization information;

4. Recommendation for distribution, specifying types of assistance, estimated number of recipients, length of program(s), and estimated costs (using percentages rather than specific dollar amounts where necessary);
5. Recommended distribution agency or agencies, including (a) description of prior experience with humanitarian aid distribution in general and programs serving Nazi victims in particular; (b) estimated administrative expenses (using percentages where necessary); and (c) where available, attach latest financial and/or other programmatic reports for recommended agency; and
6. Names, addresses and affiliations of all persons and organizations associated with or endorsing the proposal.
7. Any person or organization who objects to the Special Master's recommendation to use unclaimed residual funds, if any, for needy Nazi victims shall file these objections with the Court on or before [January 30, 2004]."

Since, as your letter notes, the Court has extended the filing deadline until January 30, 2004, I do not anticipate receiving this information until the end of this month. As stated in the Court's order, the proposals and all supporting documents will be posted on the Internet site for this litigation, [www.swissbankclaims.com](http://www.swissbankclaims.com), for public scrutiny and comment. In addition, as the Court's order also makes clear, following the January 30, 2004 filing deadline, those who wish to review and comment on any such proposals may do so through March 12, 2004; such comments also will be posted on the Internet site.

I anticipate that a number of the proposals may refer to and incorporate various studies of survivor needs and demographics, some of which were analyzed and/or published in connection with the original Distribution Plan, and others released more recently. Should you wish to review any of these studies in connection with your own proposal, they are available on the Claims Conference's Internet site, [www.claimscon.org](http://www.claimscon.org). The Claims Conference "home page" references these studies under the heading "Special Reports: Data on Needs, Demographics and Compensation Regarding Jewish Victims of Nazi Persecution." The studies listed are as follows:

- "Holocaust Survivors in Israel: Current and Projected Needs in Home Nursing Care" (JDC-Brookdale Institute, August 2003)
- "Nazi Victims Now Residing in the United States: Findings from the National Jewish Population Survey 2000-01" (United Jewish Communities, December 2003)
- "Nazi Victims in the New York Area: Selected Topics" (Report prepared by Ukeles Associates, Inc. for UJA-Federation of New York, November 2003)
- "The Social and Economic Situation in Countries of the FSU: Case Studies of Ukraine, Russia & Moldova – Highlights of the International Literature and Source Documents" (JDC-Brookdale Institute, August 20, 2003)



- "Social Safety Nets" (Annex F, Swiss Banks Special Master's Proposal, September 11, 2000)
- "A Plan for Allocating Successor Organization Resources" (Planning Committee, Claims Conference, June 28, 2000)
- "Review of Relevant Demographic Information of World Jewry" (Sergio Della Pergola, November 2003)
- "An Estimate of the Current Distribution of Jewish Victims of Nazi Persecution" (Ukeles Associates Inc., October 2003)
- "Summary of Major Holocaust Compensation Programs – Jewish Victims" (Annex E, Swiss Banks Special Master's Proposal, September 11, 2000)
- "Major Direct Compensation Programs for Jewish Victims of Nazi Persecution" (Claims Conference, November 2003)

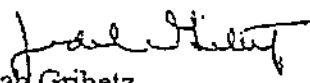
I hope that you find this information useful.

*c. Distribution proposals*

Finally, as to your request for a third category of documents – "distribution proposals" on behalf of the Looted Assets Class – the Distribution Plan explains in considerable detail the rationale for recommending the JDC, Claims Conference and IOM to administer humanitarian assistance programs on the Court's behalf for needy members of the Looted Assets Class, and also describes the historical, legal and demographic considerations upon which these distribution recommendations rest. Nevertheless, as the Interim Report makes clear, "[i]n addition to the agencies now serving the Court, there may be other worthy programs and providers capable of assisting large numbers of needy Nazi victims in an efficient and cost-effective manner." (Interim Report, p. 12). I anticipate that a number of proposals will be filed in accordance with the Interim Report and the Court's November 17, 2003 order. These will be posted on the Internet at [www.swissbankclaims.com](http://www.swissbankclaims.com) as they become available.

Should you have any further questions, please feel free to contact me.

Very truly yours,



  
Judah Gribetz

cc: Hon. Edward R. Korman  
Prof. Burt Neubome

One South Broad Street, Suite 2100  
Philadelphia, Pennsylvania 19107-3389

# FIRST CLASS MAIL

Holocaust Victims Assets Litigation  
PO Box 8300  
San Francisco, CA 94128-8300

  
1090 U.S. POSTAGE P82231527\*  
1893 \$01.060 JAN 29 04\*  
4183  19107\*



\* CD 16231415KUS \*



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Time Date *09/20*

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Basic Rate \$ *82.55*

Delivery Charge (Domestic Only) \$ *0*

Return Receipt Services  
 Show to whom and date delivered  
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