

**ICSID Case No. ARB/07/5**

**ABACLAT AND OTHERS  
(CLAIMANTS)**

and

**THE ARGENTINE REPUBLIC  
(RESPONDENT)**

---

**WORK PROPOSAL**

**in accordance with paragraph 23  
of Procedural Order No. 15**

---

**submitted by**

**Dr. Norbert Wühler**

**26 December 2012**

## **Background and Scope of the Expert's Mission**

Pursuant to paragraph 18 of Procedural Order No. 15, the Arbitral Tribunal decided to ask the undersigned to prepare a proposal detailing the work to be performed in connection with the Expertise set out in Section C of Procedural Order No. 15.

Pursuant to paragraph 23 of Procedural Order No. 15, the undersigned was requested to submit this **Work Proposal** by 23 December 2012 to the Arbitral Tribunal and the Parties. In a message from the President of the Arbitral Tribunal dated 21 December 2012, the deadline for the submission of the Work Proposal was extended to 26 December 2012.

The Work Proposal is to include “a detailed description of [the undersigned’s] team, the methodology and steps he plans to follow (together with milestones), a (non-exhaustive) list of the documents and information he will need, as well as a detailed budget estimate of his fees and expenses.” After receipt of the Work Proposal and after having consulted the Parties thereon, the Arbitral Tribunal will decide whether or not to confirm the appointment of the undersigned as Expert.

The scope of the Expert's Mission is set out in Section C of Procedural Order No. 15 as follows. According to paragraph 19 of the Order, “the aim of the **Expert's Mission (“the Expertise”)** is to examine and verify the information contained in Claimants' Database for the purposes of [...] para 501 (iii) [of the Tribunal's Decision on Jurisdiction and Admissibility].” Paragraph 19 of the Order lists the respective information with regard to natural and juridical persons.

According to paragraph 21 of Procedural Order No. 15, “[i]n examining and verifying the information contained in the Claimants' Database, the Expert shall pay particular attention to the following issues:

- (i) Whether or not the information contained in the Claimants' Database and the documents relating thereto appear to be comprehensive, i.e. sufficient to make the factual determinations set out in para 19 [of the Order];

- (ii) Whether or not the information contained in the Claimants' Database and the documents relating thereto are organized in a manageable and easily searchable way, which allow a reliable verification of the information in the Database against (a) the documents on which this information is based, and/or (b) the factual circumstances set out in para 19 [of the Order];
- (iii) Whether or not the information contained in the Claimants' Database and the documents relating thereto contain any inconsistencies, discrepancies or any duplication or any vice affecting Claimants' Database or the documents themselves;
- (iv) Whether or not the Expert encountered any particular difficulty in the conduct of the Expertise due to the design or functioning of Claimants' Database or the way the information is organized;
- (v) Any other issue that the Expert may consider sufficiently relevant to justify drawing the attention of the Arbitral Tribunal to."

#### **A. Preparation of the Work Proposal**

To be able to assess the nature and amount of work to be done, the undersigned was provided access to the Claimants' online Database, including the annexes in pdf and mdb formats and the related documents. No further explanation or information was provided.

In preparation of the Work Proposal, the undersigned undertook the following activities:

- (i) Review of the Annexes, including what types of information they contain and how this information is organized;
- (ii) Spot-checking of the relationships between Annex K and Annexes A, B and C, and between Annex L and Annexes A, B and C;
- (iii) Testing of various ways to access and navigate the information in the database and the related documents;
- (iv) Review of the database information and the related documents for a random selection of claims from Annexes A, B and C - for natural persons,

a higher number of claims was reviewed where the Index to Annex A listed the same name or the same file number more than once; for juridical entities, a higher number of claims was reviewed, in particular for incorporation and authorized signatory information and documents, where it appeared that the claims were made by non-commercial entities;

- (v) Selection of the parameters according to which claim categories and groups should be proposed for individual and sample review, respectively, and determination of sample size; and
- (vi) Identification of the team proposed to assist in the Expertise.

Taking into account the results of the above activities, the undersigned developed the methodology and steps he plans to follow, identified the documents and information he will need and drew up the budget estimate.

## **B. Methodology and Steps of the Expertise**

The **methodology** proposed for the Expertise combines the following types of activities: a technical examination of the Claimants' Database and its functionality, including the entry/migration of the information into the Database, with the assistance of an IT specialist experienced in database design and systems analysis; the initial examination and verification of the information and documentation relating to a small sample of claims, to inform the decision on the categories and numbers of claims to be reviewed as part of the Expertise; the examination and verification of the information and documentation relating to sufficiently large samples of claims, selected with the assistance of a statistician with experience in large claims programs, to allow the achievement of the aim of the Expertise as set out in paragraphs 19 to 21 of Procedural Order No. 15, this claims review being assisted by an experienced claims reviewer; and the presentation of the results of the database and claims review in the Verification Report, including the issues set out in paragraph 21 of Procedural Order No. 15.

The following **steps** are planned for the conduct of the Expertise:

- (i) Preparatory work – The documents and expert reports submitted by the Parties, as well as their summary statements, will be considered and taken into account in the conduct of the Expertise. The information and documentation relating to an initial sample of 50 claims will be examined and verified; the results of this initial review will inform the decision on the categories and numbers of claims to be reviewed as part of the Expertise. Review guidelines and a results sheet will be drafted following this initial review. – TO BE COMPLETED 1 WEEK AFTER THE SUBMISSION OF THE PARTIES’ MATERIALS (BY 28 JANUARY 2013)
- (ii) Technical examination of the Claimants’ Database – The IT specialist will review the design and the logical model of the Database and the related documentation; this will include testing data types, lengths, default values etc. of attributes. He will review the security features of the database and the data, and he will examine what audit trails exist to track changes on the database. He will also examine according to what procedures the information from outside sources was entered and/or migrated into the Database, and what quality control was performed in this respect. The IT specialist will search the Database for duplicates. And he will perform SQL queries to run reports and identify categories and/or groups of claims as specified by the Expert in the preparation and during the course of the claims review. - TO BE COMPLETED 2 WEEKS AFTER THE SUBMISSION OF THE PARTIES’ MATERIALS (BY 28 JANUARY 2013), EXCEPT FOR ONGOING SQL QUERIES
- (iii) Statistical work – Taking into account the results of the initial review of 50 claims and in accordance with standard statistical practice, the statistician will determine the type and size of the samples to be examined in the various categories of claims. It is anticipated that for the claims of natural persons (Annex A), a random sample of **maximum 1,060 claims** will need to be reviewed (assuming 50% homogeneity, with a 3% margin of error and a degree of confidence of 95%); a possible stratification of the sample should consider in particular the bond value as a parameter. The statistician will then generate the selection of the sample from the claims of natural persons in the Database. In view of their small number and the

importance of the nationality issue, it is proposed that half of the claims involving co-ownership with non-Italians (Annex B) be reviewed.

Similarly, half of the claims of juridical entities (Annex C) should be reviewed, with a focus on incorporation and authorized signatory information and documents where it appears that the claim is made by a non-commercial entity. The statistician will make a statistical analysis of the findings of the claims review. – TO BE COMPLETED 1 WEEK AFTER THE SUBMISSION OF THE PARTIES' MATERIALS (BY 28 JANUARY 2013), EXCEPT FOR THE ANALYSIS WHICH WILL BE MADE AT THE COMPLETION OF THE CLAIMS REVIEW

- (iv) Claims review – For the claims of natural persons selected pursuant to the parameters set out in B. (iii) above, the examination and verification of the information and the related documents will include the following: search of the claim by name and file number in Annex A\_Index and in Annex A\_Master; search of the claim by name and file number on the Database; examination of the information in the tabs for completeness, consistency, any discrepancies, duplication or other vice; verification of the information against the documents related to the claim; and completeness and accuracy of the documents. The findings of this review are recorded for each claim in a standardized manner in a result sheet. It is proposed that up to 950 claims (see B. (iii) above) be reviewed by the claims reviewer, as directed and supervised by the Expert. Direction and supervision will be provided through the review guidelines developed by the Expert and through regular quality control performed by him. The remaining 60 claims of natural persons (in addition to the initial sample of 50 claims), as well as the samples of claims involving co-ownership with non-Italians and of claims of juridical entities, will be reviewed by the Expert in the same manner. The findings of the claims review will be recorded for each claim in a standardized fashion in a results sheet. For the purposes of resource estimation, it is assumed that the review of one claim (including the recording of the findings) will **on average** take 15 minutes; this is based on the experience from the initial review of the 50 claims performed as part of the preparation of this Work Proposal, as well as on the likely characteristics of the sample claims to be reviewed in the Expertise. - TO

BE COMPLETED 4 WEEKS AFTER THE SUBMISSION OF THE PARTIES' MATERIALS (BY 28 JANUARY 2013)

- (v) Draft Verification Report – The Expert will draft a report in English containing the information listed in paragraph 34 of Procedural Order No. 15 (“Draft Verification Report”). – TO BE ISSUED TO THE ARBITRAL TRIBUNAL AND THE PARTIES BY 15 MARCH 2013. With the assistance of the ICSID Secretariat, the Expert will arrange for a Spanish translation of the Draft Verification Report to be sent to the Arbitral Tribunal and the Parties. – WITHIN 10 DAYS OF THE ISSUANCE OF THE DRAFT VERIFICATION REPORT
- (vi) Following examination of the Parties' comments on the Draft Verification Report, the Expert will prepare the Final Verification Report. – TO BE ISSUED TO THE ARBITRAL TRIBUNAL BY 30 APRIL 2013. With the assistance of the ICSID Secretariat, the Expert will arrange for a Spanish translation of the Final Verification Report to be sent to the Arbitral Tribunal and the Parties. – WITHIN 10 DAYS OF THE ISSUANCE OF THE FINAL VERIFICATION REPORT

### **C. Team Proposed to Assist in the Expertise**

The team that is proposed to assist the Expert in the conduct of the Expertise and whose approval for this purpose the undersigned seeks from the Arbitral Tribunal, consists of three persons with particularly relevant experience. The undersigned has worked with all three in the context of various claims programs and has thus personal knowledge of their respective qualifications and experience. Without disclosing any relevant information, the undersigned has enquired from these three persons whether they would in principle be interested and available to perform the type of work for which they are proposed, and all three have confirmed that they so would. The undersigned then asked the three persons to provide him with their CVs.

**Andrew Tatam** is proposed to perform the examination of the Claimants' Database from a technical IT point of view and to run queries and reports on the Database as required by the Expert for the conduct of the Expertise (see B. (ii) above.) Mr. Tatam

has extensive experience in systems analysis, database and process design, and Web-based applications in the context of international mechanisms for the resolution of large numbers of claims. One of his recent assignments was the review and assessment of a database containing large volumes of information and documents relating to a potential program for the resolution of Palestinian property claims. The undersigned has worked with Mr. Tatam in the context of various claims resolution mechanisms. Mr. Tatam's qualifications and relevant professional experience are summarized in his attached CV (**Annex 1.**)

**Michael Olszak-Olszewski** is proposed to determine the type and size of the samples to be examined in the various categories of claims, to generate the selection of the sample claims, and to make a statistical analysis of the findings of the claims review (see B. (iii) above.) Mr. Olszak-Olszewski is a highly qualified statistician with particular experience in the use of sampling and other statistical and mathematical methods for the resolution of large numbers of claims. He made the most extensive use of these techniques in the UN Compensation Commission (UNCC), and also in the German Forced Labour Compensation Programme (GFLCP) of the IOM, in both of which the undersigned worked with him. Mr. Olszak-Olszewski's qualifications and relevant professional experience are summarized in his attached CV (**Annex 2.**)

Given the relatively large number of claims to be reviewed in the short timeframe of the Expertise, the assistance of a person with relevant experience in this respect is required. The person proposed is **Tanja Zvekic-Devetak**. From her work in the German Forced Labour Compensation Programme (GFLCP) of the IOM, Ms. Zvekic-Devetak, who is fluent in Italian, has considerable experience with the examination and verification of electronically held information and documents related to claims, and with the analysis of the results of such review. The undersigned worked with her in GFLCP. Ms. Zvekic-Devetak, who worked on the Italian claims in that program, does not know whether any of the Italian claimants under GFLCP are among the Claimants in this case. Like the undersigned and all other staff of GFLCP, Ms. Zvekic-Devetak was under an obligation to perform her duties with independence and impartiality, which she did. Ms. Zvekic-Devetak's qualifications and relevant professional experience are summarized in her attached CV (**Annex 3.**)



Should the persons proposed to assist the Expert be approved by the Arbitral Tribunal, they should be granted the necessary access to the Claimants' Database under the same conditions as the Expert.

#### **D. Documents and Information Needed**

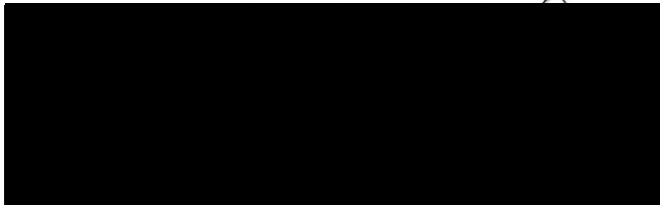
The following documents and information are needed for the conduct of the Expertise:

- (i) Documentation on the Database model and the application design;
- (ii) Information and documentation as to how the entry of the data into the Database and/or the migration of the data from third sources was performed and about the quality control that was conducted in this respect;
- (iii) Access to the Database in a format on which SQL queries and reports can be run;
- (iv) Guidelines for the efficient access to the information and documents contained in the Database and for the appropriate navigation of the Database;
- (v) An explanation as to how the information and documents in the Database will be dealt with in relation to those claims that will in future be withdrawn or whose claimants will die; and
- (vi) A clarification of the following issue: will the Database to be submitted to the Expert by 28 January 2013 contain the same information and/or documents as the Database that was provided to the undersigned on 22 November 2012? If not, what will be the differences, and how will such differences be traceable?

#### **E. Budget Estimate**

The attached budget document (**Annex 4**) details the fees and expenses estimated for the Expertise. The total of the Budget Estimate amounts to **USD 92,450**. This includes remuneration for time spent by the undersigned in relation to the preparation of the

Work Proposal in the amount of USD 15,400; remuneration for the time estimated to be spent by the Expert in relation to the Expertise in the amount of USD 51,800; estimated expenses for the persons proposed to assist in the Expertise in the amount of USD 24,750; and cost of USD 500 for a roundtrip Geneva-Hamburg, for the Expert to work with the IT specialist Andrew Tatam on the specifications for SQL queries and reports. The estimates related to the review of claims of natural persons are based on the maximum anticipated sample size of 1,060 claims.



---

Dr. Norbert Wühler

**Annexes:**

- Annex 1: CV of Andrew Tatam
- Annex 2: CV of Michael Olszak-Olszewski
- Annex 3: CV of Tanja Zvekic-Devetak
- Annex 4: Budget Estimate

## Andrew Tatam

<b>Nationality</b>	British, Australian
<b>Education</b>	Diploma in Mangement Studies, HNC and ONC Business Studies
<b>Languages</b>	English, German, basic French
<b>Role</b>	Senior Project Manager / Database and Process Designer
<b>Focus</b>	Claims processing Database and process design Document management Cloud computing CRM (analytical and operational) ERP (Financials and HRMS) Web analysis und reporting
<b>Projects Commercial</b>	Coca Cola, Commonwealth Bank of Australia, E-Plus Gruppe, German Stock Exchange, Opel, J. Sainsburys, Saudia, Vienna Energy, Vodafone
<b>Projects Other</b>	CRRPD, ECCC, ICC, IOM, IPS, Sydney University, UNCC
<b>Tools</b>	Oracle, SQL Server, MS Project, Reporting Services, Siebel, PeopleSoft, Oracle Financials, Chordiant, Clarify, ServiceNow, Newscale, SQLWindows, SQATeamtest, Mercury Interactive, ERWIN/ERX, ER Studio
<b>Project Countries</b>	Australia, Austria, Cambodia, Dubai, Egypt, Germany, Guatemala, Israel and Palestine, Jordan, Netherlands, Saudi Arabia, Sierra Leone, Switzerland, Turkey, United Kingdom

### Professional Experience (Claims Programs)

Extensive experience in domestic and international IT project management; special focus on system and database design and processing.

Expertise in leading process design, transformation change and change management, especially in large international organizations and tribunals and commissions managing claims and reparation programs.

Experienced in software development and implementation, document management, multiple database environments, management of large teams and budgets.

Worked for or advised the following organizations concerning the IT support for claims programs, in particular database design and processing tools: United Nations (UN Compensation Commission), International Organization for Migration (German Forced Labour Compensation Programme), International Criminal Court (Victims Support Unit), Extraordinary Chambers in the Courts of Cambodia (ECCC), Commission for Real Property Claims in Iraq, Institute for Palestine Studies (UN Conciliation Commission for Palestine Database), Sierra Leone Reparation Program.

### Contact

Foehrenweg 2a  
21220 Seevetal  
Germany

### Employer

Affinis, Germany

# Michael Olszak-Olszewski

## Professional Experience

### **Manager, Information Hub**

***The Global Fund to fight AIDS, TB and Malaria, Geneva, Switzerland***

Responsibilities: Manage a team of four in charge of all data-related initiatives in the Grant Management (operations) division at the Global Fund, mainly around business intelligence, analytics and statistics;  
Perform and document statistical analyses informing senior management team in their strategic decisions;  
Implement systems to monitor teams' Key Performance Indicators and trigger any corrective action;  
Coordinate the design of IT tools and systems to improve business and work processes in cluster;  
Define and oversee best practices for data collection, storage and analysis in organization.

**2007 to present**

### **Lecturer in Statistics**

***University of Geneva, Geneva, Switzerland***

Responsibilities: Teach, and carry out related research for, a weekly advanced statistics course for social science students (sociology, politics, economics, psychology, information systems, etc);  
Determine the topics and general outline of the course;  
Prepare and grade the final exam.

**2001 to present**

### **Statistician**

***United Nations Compensation Commission (UNCC), Geneva, Switzerland***

Responsibilities: Advised on and implemented statistical and mathematical solutions to assist lawyers in expediting the mass processing of claims;  
Prepared oral and written reports for a non-mathematical audience related to the application of statistics and computerized methods to claims processing;  
Liaised between the Legal Service and the IT department, mainly with respect to the development and maintenance of in-house client/server applications.

**2004 to 2007**

### **Statistical Consultant**

***International Organization for Migration (IOM), Geneva, Switzerland***

Responsibilities: Advised on statistical, computerized and mathematical solutions to assist the German Forced Labour Compensation Programme in assessing compensability and valuation of claims;  
Designed, prepared and ran database SQL queries and reports.

**2003**

### **Information Systems Specialist**

***United Nations Compensation Commission (UNCC), Geneva, Switzerland***

Responsibilities: Developed and maintained server-client applications for claims processing;  
Designed, prepared and ran database SQL queries and reports;  
Reported and prepared statistical analyses on claims-related data.

**2000 to 2004**

### **Associate Statistician**

***UNCC, Geneva, Switzerland***

Responsibilities: Designed and implemented statistical and mathematical models to assist lawyers in expediting the mass processing of claims;  
Prepared reports related to the application of statistics and computerized methods;  
Designed, prepared and ran database SQL queries and reports.

**1995 to 2000**

## **Contact**

**8, allée des Clématites  
74100 Ambilly  
France**

## Education

**University of Geneva, Geneva, Switzerland**

**1986 to 1995**

PhD in Statistics  
Masters in Econometrics  
Bachelor's degree in Quantitative Economics

## Languages

<b>French</b>	Mother tongue
<b>English</b>	Fluent
<b>German</b>	Basic knowledge
<b>Italian</b>	Basic knowledge

## Areas of Expertise and Achievements

### **Data Management**

- Designed a system to record data related to corporate Key Performance Indicators (KPI) for the Grant Management division at the Global Fund and provides regular reports to senior management about current situation of portfolio, enabling a total disbursement of 3.2 billion USD in 2012;
- Maintained and organized a database containing information about UNCC claimants, used by statistical models and formulae to generate compensation to more than 100,000 personal property claims;
- Explored and implemented a number of computerized and statistical techniques (fuzzy matching, discriminant analysis, etc) to facilitate the processing of more than 100,000 claims for the German Forced Labour Compensation Programme at the IOM;
- Act as focal point for the Grant Management division (300 staff members) at the Global Fund in matters related to data storage and usage and in the development of the corporate data warehouse.

### **IT Coordination**

- Represents the Grant Management division (300 staff members) in strategic matters related to IT at the Global Fund;
- Developed an IT-based system that allowed the Palestinian Late Claims team at the UNCC to reach its objective of processing more than 40,000 claims in less than two years;
- Programmed and maintained a series of server-client applications used by the Legal Service at the UNCC to assess and value the claims it received.

### **Statistical Analysis**

- Created for the UNCC regression models that were used to value more than 100,000 personal property claims;
- Defined and implemented sampling procedures that helped expedite the processing of more than 400,000 claims at the UNCC;
- Designed for the Global Fund a model to detect and address risk at the country level for the implementation of grants.

### **Communication and Documentation**

- Prepares PowerPoint slides used by senior Global Fund managers in their presentations and updates to the Board and Committees;
- Produced a number of technical reports that led the UNCC to increasingly adopt statistical methods in its processing of claims;
- Teaches Statistics course consistently graded excellent by students and particularly appreciated for its clarity and structure.

## **Contact**

**8, allée des Clématites  
74100 Ambilly  
France**

# CURRICULUM VITAE

Tanja Zvekic-Devetak

Chemin de la Boissierette 11, 1208 Geneva, Switzerland

## I. Education

### University

- |         |   |
|---------|---|
| 1996-97 | University of Leiden, Faculty of Law, The Netherlands<br><b>Master of Laws (LL.M)</b> in International Law    |
| 1993-96 | University of London, Faculty of Law, United Kingdom<br><b>Bachelor of Laws (LL.B)</b> (Second Class Honours) |

## II. Relevant work experience

Dates of employment:	September 2002 - October 2004
Position:	<b>Associate Legal Officer/Legal Officer</b> German Forced Labour Compensation Programme (GFLCP)
Employer:	International Organization for Migration (IOM) Geneva, Switzerland (HQ)

Responsible for the preparation of “tranches” of claims to be submitted to the German Federal Foundation for approval. In particular, the work involved:

- Carrying out legal and factual research related to particular categories of claims;
- Identifying and analyzing factual and legal issues raised by individual claims and by categories of claims, and submitting proposals for their resolution;
- Drafting legal memoranda, legal and processing guidelines for claims assistants, claims summaries, and reports on groups and categories of claims;
- Supervising the review of claims by claims assistants, and developing a quality control system for the claims review;
- Participating in the drafting of specifications to the IT Team for the database and software applications that facilitated the claims processing;
- Preparing requests to the IT team for computer actions to support the claims review and resolution.

In addition, responsible for the planning and coordination of the review of claims filed by persons of Italian nationality (the largest claimant group of the Programme - 130,000 claims), as well as of claims filed by persons from former Yugoslavia (the largest group of compensable claims - 30,000 claims).

Dates of employment: September 2000 - September 2002  
Position: **Project Manager/Field Office Co-ordinator**  
German Forced Labour Compensation Programme (GFLCP) and  
Holocaust Victims' Assets Programme (HVAP)  
Employer: International Organization for Migration (IOM)  
Rome, Italy

Responsible for the planning, direction and supervision of operational activities carried out in Italy relating to the implementation of GFLCP and HVAP. In particular, the work involved:

- Organizing the Programmes' outreach activities;
- Maintaining contacts and developing co-operation with victims' associations, unions and other concerned parties;
- Co-ordinating and supervising the GFLCP/HVAP staff in the activities of claimant assistance, claims intake and registration, and review and evaluation of the claims;
- Assisting the IOM Chief of Mission in his contacts with representatives of the Government of Italy and other counterparts relevant to the Programmes;
- Preparing briefs, information notes and other materials for the media and the public;
- Carrying out historical and legal research and collecting relevant background information.

### III. Languages

Serbian	mother-tongue
English	bilingual proficiency
Italian*	bilingual proficiency
Spanish	working knowledge
French	working knowledge

\*Lived in Rome (Italy) for a total of 14 years. Completed the compulsory school diploma ("terza media") in 1989, attended several courses at Luiss Guido Carli (Faculty of Law) in 1998, worked as legal apprentice for a law firm in Rome(1998-2000) and as a Project Manager with IOM Rome (2000- 2002).

### IV. Computer Skills

MS Office; Oracle GFLCP-customized applications

ICSID Case No. ARB/07/5					
WUEHLER - WORK PROPOSAL, ANNEX 4 (BUDGET ESTIMATE)					
<b>Activity</b>	<b>Resource</b>	<b>Days</b>	<b>Rate</b>	<b>USD</b>	
<b>WORK PROPOSAL</b>					
Access and navigation of Database	Wuehler	0.5	2800	1400	
Claims review	Wuehler	2.5	2800	7000	
Sample determination	Wuehler	0.5	2800	1400	
Drafting of Work Proposal	Wuehler	2	2800	5600	
SUB-TOTAL		5.5		15400	
<b>PREPARATORY WORK</b>					
Consideration of Parties' submissions	Wuehler	2	2800	5600	
Initial claims review (sample of 50)	Wuehler	1.5	2800	4200	
Analysis of results, initial claims review	Wuehler	1	2800	2800	
SUB-TOTAL		4.5		12600	
<b>TECHN. EXAM. OF DATABASE</b>					
Review of design and logical model	Tatam	1	1400	1400	
Testing of attributes	Tatam	0.5	1400	700	
Review of security and auditability	Tatam	1	1400	1400	
Audit of entry/migration of data	Tatam	0.5	1400	700	
SQL queries for groups and patterns	Tatam	2	1400	2800	
SUB-TOTAL		5		7000	
<b>STATISTICAL WORK</b>					
Determination of samples	Olszak	1	1000	1000	
Generation of sample claims	Olszak	1	1000	1000	
Analysis of sample results	Olszak	1	1000	1000	
SUB-TOTAL		3		3000	
<b>CLAIMS REVIEW</b>					
Non-Italian co-owners (18 claims)	Wuehler	0.5	2800	1400	
Juridical entities (47 claims)	Wuehler	1.5	2800	4200	
Natural persons (60 claims)	Wuehler	2	2800	5600	
SUB-TOTAL		4		11200	
<b>CLAIMS REVIEW</b>					
Natural persons (950 claims)	Zvekic	29.5	500	14750	
<b>DRAFT VERIFICATION REPORT</b>					
Analysis of results of claims review	Wuehler	2	2800	5600	
Writing of Draft Verification Report	Wuehler	3	2800	8400	
Arranging of Spanish translation	Wuehler	1	2800	2800	
SUB-TOTAL		6		16800	
<b>FINAL VERIFICATION REPORT</b>					
Examination of the Parties' comments	Wuehler	1	2800	2800	
Writing of Final Verification Report	Wuehler	2	2800	5600	
Arranging of Spanish translation	Wuehler	1	2800	2800	
SUB-TOTAL		4		11200	
One roundtrip Geneva-Hamburg				500	
<b>TOTAL</b>				<b>92450</b>	