

Notaries, *Saisine*, and Family Secrets in Modern France

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The 1971 annual meeting of the notaries of France took place in Vittel. Because new legislation concerning successions had been passed during the previous year, the proceedings were largely devoted to that subject. In French law, successions includes both lifetime gifts and post mortem inheritances, matters which command more than half the work of most notaries.

One of the major papers at the Vittel meeting was given by a Parisian notary, Maître J.-J. Préa. His main purpose was to show his colleagues that French successoral practices had become "aged and ill-suited to modern times," but he began with a strong apology for the philosophical principles of the old system. He compared French inheritance practices with those of other nations, especially with the Anglo-American because it was strikingly different. The value-judgment Maître Préa put on those differences will startle most students of English and American law.

Anglo-American successions appeared in Maître Préa's mind's eye to be *extrêmement autoritaire* or (his preferred term) *dirigiste*. This stems from the authority of the state, acting through the power of the courts, to intervene at the moment of demise of the *de cuius* and certify the executor or administrator of the estate who is charged to carry out the procedures of probate--settling the debts, making the inventory, fulfilling the legacies, paying the estate taxes--while the heirs wait to realize their proprietary rights. Maître Préa was baffled to understand how a political tradition famous for its independence and individualism would require family heirs to wait a year or more before enjoying the patrimony. This stands in sharp contrast to the French successoral system, which works the other way around. The heirs themselves (who in France must be the children and the surviving spouse, for the major part of the estate) take immediate possession of the entire estate according to their right of *saisine*: they themselves, with the private counsel of a notary, requite the debts and legacies; they themselves decide upon the division (*partage*) of what remains. Only then, six months or more later, do the heirs draw up and submit to the government an inventory of the estate, showing how they had divided it, and let the state go about collecting the successoral taxes. As Maître Préa saw it, the French system is one of *l'autonomisme total*.

Maître Préa actually added to *l'autonomisme total* the qualification *anarchique*. In its root meaning, "anarchic" connotes not so much the absence of government as a sense of general disorder. One cause of disorder, in the case at hand, was the necessity to consider lifetime gifts that parents had made to children; such *rappart* (as it was called) was necessary to equalize the shares in the inheritance among children, according to the provisions of the Code Civil. Maître Préa viewed the process of succession from the point of view of the heirs. In France, the heirs regulate the succession free from state intervention; in England and America, state-appointed authorities regulate the succession to the exclusion of the heirs. Quite different moral conclusions can (and by Anglo-American authors are) drawn by taking another coign of vantage: that of the deceased, not the heirs. It is the autonomy of the deceased, as expressed in the last will and testament, that the state is protecting. English solicitors and American lawyers regard

their governments' *dirigisme* in successions, so deplored by French notaries, as the safeguard of individual rights in the best tradition of democracy.

Whether to take the view of the heirs or the view of the deceased is not purely arbitrary. It follows from the different spirit of the two laws. The Code Civil requires that half or more of every estate go to the direct heirs, no matter what the deceased may have declared in his testament. Common law, on the other hand, allows almost complete testamentary freedom to the deceased, even to the extent of allowing "disinheriting" the heirs. As a consequence of these differences, most successions in France are intestate because testamentary powers are very weak, whereas in England and the United States successions are usually testamentary because the testamentary power is very strong.

The moral domain of all successoral systems has customarily been defined as lying between two poles, one that honors the specific wishes of the deceased as if his or her will were perdurable beyond the mortal coil, the other that cares for the needs of the deceased's heirs according to societal norms of how every person should want his or her estate to be divided. (The latter case is most efficacious, of course, when those heirs are the deceased's progeny; this is usually the case and the one we shall assume unless otherwise stated.) This polarity is somewhat obscured by the fact that all successoral systems must contain provisions for intestate successions, and these are customarily defined as the "presumed will of the deceased." That is to say, the rules of intestate successions imagine what the deceased's testament would have stipulated; in fact, these rules are nothing but societal norms. In strongly testamentary systems (such as the Anglo-American) these societal norms exist passively and become active only when a person by choice or by accident does not make a last will and testament. In strongly intestate (systems such as the French) societal norms actively dictate the disposition of the bulk of the estate no matter the will of the deceased. In these terms, then, had the society of English solicitors been meeting in 1971 (say, in Bath), the French system could easily have been castigated as "authoritarian."

The polarity between "deceased's will" and "descendants' needs" puts the matter rather baldly. Think rather of the family as a unit whose integrity over time is vitally affected by the preservation of the patrimony. The polarity now lies between entrusting the fate of the patrimony to the incumbent generation, as epitomized by paterfamilial power, or to the whole series of generations imagined as a single entity, as exemplified by the legal fiction of the "lineage rights". The vista opens upon the sociology of the family--the synchronism of ancestral piety, family headship and children's rights--as well as upon the role of the family, diachronically, in the political and economic order of things.

France before the revolution knew both of these systems. In the south, the region of written (Roman) law, the head of the family was free to manipulate the patrimony during his lifetime and, upon death, able to use testamentary powers to advantage the heir who had been chosen to succeed to the paterfamilial power. All descendants were entitled to a minimal "legitimate portion", but the spirit of the *Corpus Iuris Civilis* invested each successive incumbent head of the family with the main responsibility for managing the patrimony. In northern France, despite the regional variety in customary laws (*coutumiers*) that held sway, the spirit of successoral law worked the other way. The incumbent generation, during its lifetime, lacked the

right to alienate ancestrally inherited real property (*propres*), and, upon death, was required to transmit all of it to direct heirs (usually, moreover, in equal shares). The law concerned itself above all with the preservation of lineage rights.

Correlative to these differences we find that, in pre-revolutionary times, successions in southern France almost never occurred without a testament while in the north they were overwhelmingly intestate. The *Code Civil* of 1804 clearly adopted the spirit of the northern *coutumiers* by guaranteeing the heirs' rights to the inheritance. If the parents make no testament, the children divide the entire estate in equal shares; if there is a testament, the estate must to to the progeny, half of it if there is but one child, two-thirds if two, three-quarters if three or more--always in equal shares. Still today in France most successions are intestate, the heirs making the final division of the estate.

In nations where English common law prevails, inheritances are still overwhelmingly testamentary. Yet some of these countries have recently put limits on testamentary freedom by requiring that minimal portions be left to heirs. Maître Pr ea noted this fact during his address to his colleagues, but he showed no particular pride in what seemed to be the Civil Code's penetration of the bastions of common law. He was not much concerned with the substance of the two laws, but the procedure of executing them. For Ma tre Pr ea, the benchmark of difference in successoral matters between Civil Code and common law was not the guaranteed rights of direct heirs to inherit most of the estate but the autonomy of the heirs to take immediate control of, and carry out, the successoral process as opposed to the Anglo-American "authoritarian" system of control throughout by the court of probate.

Ma tre Pr ea saw no sign of common law's relaxing probate procedures. Quite the reverse, he saw signs in some countries (*e.g.*, Belgium and Spain) whose civil codes had been modeled on the French Code Civil that state intervention in succession was on the rise. He believed that the French system would have to allow for more state regulation, but only in ways that would help the heirs to make the division without denying their right to possess the entire estate upon the decease of their parent. More use of testaments, for example, might facilitate the heirs' dividing up the estate, provided that the testaments were made in consultation with a notary (notaries know the fine points of the legal limits on the testamentary power). Perhaps intestate successions in France should be regulated, as they were in Spain, by a court-appointed notary who could arbitrate disputes among heirs without usurping their right to make the final decision about dividing the estate.

The notary's function was prominent in all the improvements Ma tre Pr ea allowed as desirable, but the fundamental right of the heirs to possess and divide the estate would remain untrammelled. Whatever devices might be introduced to help resolve disputes among heirs in the division of an estate, no outside party should have the power to force any resolution upon the heirs. For, to make any such resolution equitable, that third party would have to know every detail of the estate's value, and to do that would have to have the power to possess everything at once in order to prevent any one heir's sequestering items that could easily be concealed. Given those powers, the third party would be acting in the *dirigiste* fashion that Ma tre Pr ea deplored. Ma tre Pr ea does not say explicitly that the heart of the French successoral system is *saisine*, the power of the heirs to possess the entire estate immediately, but from an Anglo-American point of

view that certainly is the case when one considers the consequences of its operation.

Since all the direct heirs enjoy the same power of *saisine*, the moment of demise would seem to invite chicanery on the part of the first heir to get inside the door of the parental home. But there is one effective block to that happening: if any heir suspects the actions of another, or is in any way unhappy about how the *partage* is proceeding, he or she can ask the courts to intervene, put the entire estate under lock and key, and appoint an administrator to supervise the estate settlement. In such an eventuality the French system becomes as *dirigiste* as the common law's, with the difference that in the latter the intervention is mandatory from the first as a device to protect the will of the deceased while in the former it operates contingently to protect the rights of one of the heirs.

French successions rarely experience such calls for court intervention. For one thing, such action would make family secrets public knowledge, a reprehensible event in French social conscience throughout many centuries. Another consideration, much more important in my mind, arises from the fact that during the last century or so the government has levied taxes on "mutation" of estates at the time of death. To call the courts in to regulate a disputed division of the estate among the heirs would require that the government administrator be given complete details of the extent of the estate. In that moment, whatever notion the heirs as a group may have had to conceal parts of the estate in order to escape taxation would be forsaken, and each heir would suffer some loss in the form of higher taxes. Self interest, therefore, demands that the heirs not try to cheat each other and run the risk of one of their number appealing to the courts; instead, they must maintain corporate harmony so that they can as a group practice *fraude* upon the state.

In medieval legal terminology, French *saisine* differed little from English "seizin": both were used for a variety of possessory actions. In English common law still today the nominative term "seizin" denotes several actions, but as early as the fifteenth century *saisine* began to be restricted in France to just one action, successorial possession (the verbal form, *saisir*, being used for other kinds of "seizin".) The reason for this, conventional wisdom has it, is that the heirs of the deceased sought to protect the family's lineage property against depredations of the feudal lord to whom some form of indenture might be due.

Possession and proprietary right got confounded in ways that modern scholars still quarrel about, and the issue was complicated further in the 18th century when *saisine* was connected with the principle from France's other law, the *Corpus Iuris Civilis*, that "the heir continues the person of the deceased" (*la continuation de la personne du défunt*). In practical terms, the heirs' right of *saisine* posed no great legal problems in early modern times unless it happened that the deceased's estate was close to insolvency. Creditors could find themselves competing with heirs for the patrimony, with the heirs having the advantage of having already received much of it in the form of lifetime gifts. Still, in an age when real property, land and houses, constituted the major part of the patrimony, it was usually clear just what was being contested.

There was no apparent reason not to maintain *saisine* in the Code Civil of 1804. The heirs' instant possession of the estate agreed in spirit with the new rules of "forced heir-ship"

which guaranteed the heirs' rights to succeed to most of the property. But the kinds of property that patrimonies consisted of changed. Movable property--gold, currency, bonds, and the like--assumed an ever-larger status in family wealth. This made the problem of creditors' claims much more serious, as is proven by the history of litigation and jurisprudential argument since the Code Civil. Simply put, it cannot be a happy thought for the creditors of a deceased person who is known to have been heavily in debt, that the heirs will have uncontrolled possession of the estate for many weeks or months before deciding whether to accept or reject the heir-ship. If the debit-credit balance is nearly even in the estimation of the heirs, who are the first to know the exact dimensions of the estate (and know it secretly), how great the temptation to keep for one's self the secret wealth in movables, renounce the heir-ship, and let the creditors realize what they can from the property that cannot be concealed but is known to be worth less than the total of the debts!

The problems *saisine* can raise for private creditors are considerable, but do not arise often; insolvent patrimonies are not characteristic of the French. Quite otherwise with the State, the great public creditor, when it began to levy successorial taxes in the later nineteenth century. It always had an interest in the size of the estate; correspondingly, the heirs always had an interest in concealing what they could of the contents of the estate. Therewith the familial right of *saisine*, designed in medieval times to resist feudal nobles, found new life as a device to thwart the modern state.

Inheritance taxes are not much more than a century old anywhere in Europe and America, and they did not assume sizeable proportions until just before--and especially during--World War I. In no place have they been harder to collect than in France, and for no reason greater than the heirs' power of *saisine*. The philosophical justification for *fraude* is typically couched in terms of traditional family rights. From time immemorial governments have sought to protect the interests of families, which are the bulwark of society; the modern state is violating fundamental law by making itself an heir of sorts to the family's patrimony. The practice of *fraude* is also abetted by the fact that the act is not a felony, as is Anglo-American "fraud", and that the pecuniary penalty is not much greater than making good the tax on the concealed items. Far from being a reprehensible act, *fraude* in successions in modern France is a universal practice, a veritable institution, a national sport.

The legendary leader on the list of objects transmitted without record from generation to generation in France is, of course, gold. An article in *Le Monde* a few years ago declared that seven percent of all gold mined since 1423 was buried underground in France--an incredible statement in several ways. Bearer bonds probably hold second place, for one finds references to caching them away in the linen closet used almost as a cliché in late nineteenth-century literature. Gold and bonds had to be privately hidden, since the government tried to keep track of safe-deposit boxes. Legislation in 1918 required that a notary be present when the heirs opened the deceased's safe-deposit box. This was enhanced in 1923, in a move designed "to foil a collusion between the notary and the heirs", by requiring that the notary give advance notice of such openings to the Registry office that dealt with succession inventories, so that it could send one of its agents--that which it never failed to do. Bank accounts and insurance policies were also the object of close surveillance, but, as is usual in these matters, the greater the number of

laws and administrative regulations issued to plug loopholes, the greater the assurance that demon *fraude* is abroad.

The state quit the battle, defeated, on 1 January 1960, by relaxing all the rules about opening safe-deposit boxes and divulging bank and insurance records. This was not done as a Gaullist government's concession to the wealthy, but in recognition of the implacable resistance of the French people generally. One of France's most distinguished notaries, among whose clients is the Rothschild family, related to me that in the five years before 1960 he and his staff found nothing of value in safe-deposit boxes opened under the supervision of revenue agents in the presence of the "seized" heirs and their notary. One way to avoid having safe deposit boxes inspected at all was to incorporate a civil company (*société anonyme*) which never dies in the eyes of the law. That same notary related one company he knew of that was incorporated in the name of the family's dog. (*Corpus canis nunquam moritur*, a modern Baldus might quip: "the caninified body never dies.")

In order to verify what my bookish research had taught me, I interviewed a half dozen notaries in the summer of 1977. The notary's role in French society poses a true dilemma for him. The notarial *étude* is a semi-public venal and hereditary office, a true remnant of prerevolutionary times. On one hand, the notary acts as the family's confidential advisor and is privy to many family secrets; on the other, he plays the role of a public servant by validating transactions between private parties and reporting them to the state if the state has an interest (e.g., if taxable or involving a public title of ownership.) Before considering how this double role affects the notary's performance in treating estate successions, it is useful to recall the much better known role of notaries in validating real-estate transfers.

Secret agreements between buyer and seller of real property almost invariably take place before the visit to the notary: the actual sale price will be considerably greater than the "notarized" price, in order to lessen the burden of the state's value-added tax imposed on such transactions. The notary knows that the true sum has been exchanged under the table before the parties come to him to register the transfer of title at the stipulated lower price. Some notaries will force the parties to raise the declared price of the sale in order to be more in line with known market values and forestall an investigation by the government officials, who also know the market price. Everybody knows that *fraude* is taking place. The only issue is to estimate the degree of the state's toleration. The notary can act, in effect, as broker.

In estate successions, *fraude* takes the form of the heirs' omitting as much as possible from the inventory that is finally submitted to Registry officials. The notary knows in general that such concealment of property is happening, and as the longtime family confidant probably knows many of the details. The most delicate of the questions I posed to the notaries I interviewed was, therefore, whether they felt pangs of conscience when they knew full well that the inventory they were called upon to validate and present to *I' Enregistrement* was far from a truthful declaration of the size of the estate. The answer was always the same, as if learned by rote from the manual of notaries: we are obliged to tell our clients what the law is and what the penalties for *fraude* are, but once this is done we are simply executing a legal formality.

I asked also, of course, about *saisine* as a main reason for *fraude*, but was surprised to be

answered regularly in the negative. Things easily concealed, such as gold, will always go to the heirs unbeknownst to the state even if the convenience of the heir's *saisine* were to be ended. Tighter control of *post mortem* transmissions will only lead to greater use of *inter vivos* transmissions. That is what I was told. As I see it, they were all verifying the materialistic premise I suspect lies behind Maître Pr ea's praising the autonomy of the French successoral system: the heirs' rights to instant possession subsumes the right to battle against the state's claim to share in the estate. Mandatory probating of estates, Anglo-American style, would not change the French mores. I regret now that I did not think to ask if this would be true even if heavy criminal penalties were attached to *fraude fiscale*, which now they are not.

Sly insinuations that *fraude* in French successions is base behaviour does not sit well with French notaries. They regard *fraude* as morally innocuous. Several of them asserted that *fraude* serves in France to avoid estate taxes the way that trusts and foundations serve to escape taxes in Anglo-American law. Trusts are prohibited outright in the Code Civil and foundations are disallowed if they benefit family heirs. French law does not have generation-skipping practices that reduce taxes while benefiting descendants. I could think of no good rebuttal to this argument.

My hypothesis that a causal relationship may exist between the estate taxes and family cohesion has profound implications for social history. Since lifetime gifts must be recalled fictively when calculating the *masse successorale* that the heirs divide equally when their parents die, and the parents in our time live so much longer than just a century ago, each heir for the better part of his or her lifetime has to be kept apprized of the fairness of parental favors to other heirs in order to minimize the danger of any heir feeling so cheated as to appeal for court intervention at the time of estate settlement. My notarial respondents seemed only to be mystified by the idea that any sociological idiosyncrasy was involved; to them this seemed to be perfectly normal human behavior. They all reported, however, that contested successions were quite rare. My hypothesis remains viable, but proof of its operation would require profound sociological research. I do not say that the necessity for a lifetime of mutual trust among heirs in order to attain a final moment of fulfilling individual self interest at the expense of the state establishes the basis for a generalized, altruistic behavior in the French family. To the contrary, it may induce a lifetime of mutual suspicion. One way or another, however, the heirs have to be concerned with each other's behaviour and welfare for reasons that are not true in other countries.

Lest it be thought that the great potentialities for *fraude* amount to grand evasion of taxation, let it said that while the rate of estate tax in France is graduated as in England and America, the maximum in France has never come close to the rates in the other two countries. It never reached even thirty percent, and stands today at around twenty. Lifetime transmissions to heirs are encouraged by reducing the tax upon them at the time of estate settlement in proportion to the number of years before demise that they are transmitted. For private individuals such transfers are desirable for real property, which, because it involves a legal title, cannot be concealed from the eyes of the law. Quite otherwise for currency, bearer bonds, and similar forms of wealth that are held anonymously. Parents have no more reason to make notarized statements of lifetime gifts of these kinds of movable wealth to their heirs than those heirs have to list them in the inventory of the estate when their parents die. Yet it has to be true, given the

great longevity in modern societies, that patrimonial aid to children during the prime of their lives can only be accomplished by lifetime gifts. How is the government to keep track of these if they take the form of silent transfers of movable riches?

The current dilemma in the French government's surveillance of estate settlements--above all for the very rich--is thus not so much to discover what the deceased still owned, at the moment of demise as to know what had been transferred inter vivos to heirs during many decades beforehand. The transfers themselves cannot be detected, but the effects of them may be detectable in one place: unaccountable signs of affluence in the life of the heirs. The fiscal device to discover these traces of new wealth is in the annual income tax.

All the world knows about *fraude* in income tax declarations in France, especially in the keeping of two sets of business records: one set of books for the family, another for the government. What individuals cannot hide from public knowledge, however, is property that requires a legal title of ownership (land, houses, automobiles, yachts, and the like) and other "notorious and ostentatious expenditures" that the revenue service tries to discover. All the legal-title acquisitions in a given year must be listed in the annual declaration of income. These items (which the government can verify by cross-checking public records) plus the notorious and ostentatious expenditures provide the basis for the government's notion of the individual's estimated income. When a clear disparity exists between that estimated income and the manifest outlay for acquisitions and expenditures, the burden of proof that no *fraude* exists falls upon the individual taxpayer. Proof that the purchases came from long-held wealth would entail disclosure of one's private possessions, which is the one thing the government has no way of knowing in France. Unable or unwilling to provide such proof, the individual simply has to pay a tax on the presumed amount of undisclosed income. Among the children of the very wealthy, at least, the source of this unmentioned, but taxed, income is likely to be a lifetime gift.

If I am not mistaken, the revenue service in France has essentially given up its efforts, to uncover *fraude* in the final stage of its operation, at the death of parents, and begun to focus upon evidence gained, year-by-year in individual income tax returns, of transfer of wealth from parents to children. This may not be an accurate way to discovering the true size and source of private fortunes, which in France remain family secrets as much today as during centuries past, but it is possible in the age of computers to assemble details from the visible conduct of wealthy individuals that will allow a fair minimum estimate of annual income. Somewhere in the bulk of undeclared income of some individuals there will be patrimonial transfers, and in taxing that undeclared income the revenue service will enjoy a measure of success in taxing great family fortunes that it never had when concentrating upon succession taxes.

The government's use of income tax declarations to discover taxpayers' hidden income could be foiled if the taxpayers did not acquire property or did not make expenditures that could not be concealed from public knowledge. Aside from pathological misers, this is not a realistic supposition: the wealthy are not wont to deny themselves the enjoyment of the good life simply in order to thwart the revenue service. Watching the income of potential recipients of patrimonial transfers year by year, rather than waiting until the donor's death to try to reconstruct what his or her lifetime of giving may have been, clearly makes sense in terms of tax enforcement; but there is another fiscal advantage. Netting the succession tax by bits and pieces in the disguise of annual

income tax means that the government collects its duties much earlier than if it waited for the parents to die before trying to levy a tax on gifts made decades earlier.

Another device to escape succession taxes that leaps to mind is the flight of wealth to foreign tax havens--*les paradis fiscaux* is the felicitous term used by French students of the subject. Until recent times these have not been used by wealthy French families as much as one might imagine, given the fact that *fraude* in successions is not regarded as sinful. The domestic means of *fraude* seem to have proven adequate until very recent times, but my notarial respondents reported that the incidence of their clients' seeking fiscal paradises grows yearly.

The view I have offered of the French successoral system bears out Maître Pr  a's characterization of it as "autonomous and anarchic", but in distinctly more cynical terms. In retrospect I realize that I haven't probed deeply enough one aspect of fiscal *fraude* in France: penalty. In both successoral and income tax laws, the government imposes only a monetary fine upon individuals whom it proves have failed to declare some taxable items. Since the individuals who stand to win most and to bear losses best in the game of *frauder ou payer* are by definition persons of considerable means, could the state not prevent the grossest *fraudes* by changing the penalty (at least at a certain level of culpability) from a fine to a jail sentence--i.e., by adopting the Anglo-American system of dealing with serious cases of income tax invasion as criminal acts? That the French government has never taken serious steps in this direction almost validates the attitude of the French people (and their notaries) that fiscal *fraude* is not dishonorable.

Clear proof that legislators are reluctant to impose criminal penalties on fiscal fraud was provided by a debate in the *Assembl   g  n  rale* a few years ago. The law being debated was designed to protect citizens from overly zealous tax agents. It seems that several *petits commer  ants* had committed suicide leaving notes blaming penetration of their private lives --let us say, family secrets--by revenue personnel looking for evidence of *fraude* in income tax declarations. The provisions of the law concerning investigations of wealthy citizens are of singular interest. By "wealthy" I mean extremely wealthy, where the amount of tax fraud was in the tens of thousands of dollars. The new legislation declared that ordinary tax agents should no longer be allowed to investigate these cases; instead, , special blue-ribbon tribunals would be empowered. I forbear commenting upon what this implies about French legislators, French tax agents, and French super-rich. Truly confounding to me, however, were two new penalties voted for convictions of gross tax fraud. For me as an American they seem to amount to striking the *fraudeur* with a hammer in one case and with a feather in the other, although the French lawmakers seem to have regarded them the other way around.

The first penalty was to suspend for one or two years the culprit's right to practice his profession. I cannot conceive such a sentence being voted by the United States Congress, for it could amount to the loss of a million dollars of income to high-level executives. All I can guess, from what I know about the size of patrimonies of the super-rich in France, is that the loss of a year or two of professional income would not hurt that much. The individual would be thrown back upon unearned income, i.e., upon income from patrimonial sources, which probably exceeds the earned income in any event and was probably the source (not known in detail by the state) of the *fraude* in the first place. This grave penalty was approved by the French Assembly almost without debate, as if to demonstrate its meaninglessness.

Not so with the other penalty. Deputies from all parties, including the communists, proposed amendments and debated the issue heatedly for many hours before finally agreeing that in the future supper-rich *fraudeurs* in France were to suffer the penalty, for a year or more, of having their driver's licenses revoked for a year or more.

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