

FORMAL PETITION

TO THE INTERNATIONAL HOLOCAUST REMEMBRANCE ALLIANCE

for the Review, Corrective Action, Suspension, Downgrade, or Revocation of the Member-Country Status of the Republic of Lithuania

Submitted to:

Mr. Marcelo Mindlin

Chair, International Holocaust Remembrance Alliance (Argentine Presidency 2026)

Ambassador Michaela Küchler

Secretary General, International Holocaust Remembrance Alliance

**Heads of Delegation, IHRA Member Countries
Chairs, IHRA Working Groups and Committees**

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Executive Summary

This petition asks the International Holocaust Remembrance Alliance to apply its own 2019 expert findings to the Member Country those findings concerned. In April 2019, the chairs and recent chairs of IHRA's expert working groups and committees issued a [statement of grave concern](#) naming the Lithuanian Genocide and Resistance Research Centre (LGGRTC) and the historical figure Jonas Noreika, tying the matter to [IHRA's Working Definition of Holocaust Denial and Distortion](#). The statement remains on IHRA's website. Seven years later, the record it identified has not been cured.

What has changed in the intervening period is that Lithuania has moved from refusing to cure the state-memory problem IHRA identified to using criminal law against a Jewish citizen who challenges that same memory apparatus. On October 30, 2025, the Vilnius District Prosecutor filed a 220-page indictment against Artur Fridman under Article 170² § 1 of the Lithuanian Criminal Code, the statute criminalizing public approval, denial, or gross trivialization of international crimes recognized by Lithuania, including Holocaust-related crimes. The basis was a Facebook post written at his grandfather's grave. On December 4, 2025, the Vilnius Regional Court convicted a Lithuanian party leader, Remigijus Žemaitaitis, under the same statute for inciting hatred against Jews. The statute exists. It works. It is being applied in opposite directions.

The violation before IHRA is no longer the 2019 distortion. It is the refusal to cure after IHRA notice. The procedural posture is established institutional refusal by a Member Country to apply the Alliance's own anti-distortion standard to itself. The petition treats this as a cure-default case.

The relief requested is institutional, not adversarial. The petition asks IHRA for referral to its expert bodies; a required written response from Lithuania; publication of that response; a corrective-action process with defined benchmarks for administrative and leadership change at LGGRTC and for correction of the Noreika materials; a reasoned public assessment within ninety days; and, if cure is refused, suspension, downgrade, or revocation of Lithuania's Member-Country status.

Pre-submission notice was transmitted to the Lithuanian state apparatus on May 27, 2026, with written acknowledgment received the same day from Consul General Sandra Brikaitė. Lithuania has been given the opportunity to answer before this protective filing proceeds. The questions placed are not theatrical. They are the questions any IHRA Member Country committed to Holocaust truth should be able to answer. The petition incorporates Lithuania's response, or documented non-response, as the Due Process exhibit.

I. Petitioner and Standing

Grant Arthur Gochin is a Litvak descendant whose family was murdered in the Lithuanian Holocaust. He has documented Lithuanian state conduct against IHRA's anti-distortion standard for over a decade. He is the author of *Malice, Murder and Manipulation* (2013), a published account of the destruction of his family in Lithuania and of post-war historical distortion. He is a PhD candidate in Holocaust and Genocide Studies at Gratz College.

The petitioner's standing rests on three independent grounds. First, he is a descendant of victims of the conduct the Lithuanian state apparatus continues to mischaracterize. Second, he has been a named subject of Lithuanian state action: Lithuania's Journalist Ethics Inspector, in decision S-424

of April 25, 2022, ruled him a “public person” in Lithuania, attaching reduced legal protection — a determination the petitioner accepts as state-issued evidence of his standing in the field of Holocaust accountability. Third, he has submitted, since 2015, forty-nine formal submissions to Lithuanian state bodies seeking correction of the documented record, exhausting the available domestic avenues prior to this filing.

By the operating logic of S-424 itself, on the predicate elements the Lithuanian state enumerated in that ruling, the petitioner is a recognized public person in Lithuania on the subject of Lithuanian Holocaust memory. The classification the Lithuanian state built to weaken the complainant operates in both directions: it cannot be cited to reduce the petitioner’s standing on a question of Lithuanian Holocaust accountability without being read inconsistently with the use the state made of it in the petitioner’s own case.

Standing before IHRA is not based on a personal grievance. It is based on the petitioner’s documented engagement with the Member Country whose conduct IHRA’s own experts identified as inconsistent with the Alliance’s anti-distortion standard. The petitioner appears before IHRA in his capacity as a documented complainant before the Lithuanian state apparatus and as a participant in the public-record predicate cited in Appendix B.

Petitioner’s signed declaration. The petitioner attests under his signature to the foregoing standing facts, including authorship of “IHRA Was Warned in 2019. Lithuania Did Not Cure.” (Times of Israel, May 27, 2026), the petitioner record of forty-nine documented formal submissions to Lithuanian state bodies since 2015, and the S-424 “public person” determination of April 25, 2022. The signed declaration is bound with this petition as the Petitioner’s Signed Declaration immediately following the petition body. The wave articles cited in Appendix B stand on their published Times of Israel bylines as the contemporaneous public-record predicate; declarations from the wave authors may be added in supplemental filing if executed.

II. Due Process Offered

On May 27, 2026, prior to this filing, the petitioner transmitted a pre-submission notice letter to the Lithuanian state apparatus and to the Lithuanian Jewish Community. Recipients included Mr. Ronaldas Račinskas (Head of the Secretariat, International Commission for the Evaluation of the Crimes of the Nazi and Soviet Occupation Regimes in Lithuania), Ms. Ingrida Vilkienė (IHRA Education Working Group), Ms. Faina Kukliansky (Chair, Lithuanian Jewish Community), Dr. Arūnas Bubnys (Director General, LGGRTC), the LGGRTC Centre Council, the Consulate General of Lithuania in Los Angeles, and as awareness consultates the Consulates General of Germany and Argentina in Los Angeles.

Consul General Sandra Brikaitė confirmed receipt in writing on the same day at 17:22 UTC, confirming forwarding to the Lithuanian Ministry of Foreign Affairs and the Embassy of Lithuania in Washington, D.C. Lithuania was given a comment window through end of day June 2, 2026.

This filing is procedurally protective. Lithuania’s response, if any, will be incorporated as an exhibit. A documented non-response will be incorporated as evidence of refusal to engage on the merits. Neither outcome prejudices the petitioner’s claim. Both confirm the procedural posture set out in Section III.

III. Procedural Posture: The Cure-Default Case

This petition is not a request for IHRA to enter a new dispute. It is a request for IHRA to act on its own prior expert warning seven years after Lithuania refused cure.

The 2019 IHRA expert statement was not a contested opinion. It was a public expert application of IHRA's own standard by the chairs and recent chairs of the Alliance's expert working groups and committees — the persons the Alliance itself appoints to define what Holocaust distortion is and is not. The statement named the institution (LGGRTC), the historical figure (Jonas Noreika), the documentary record being contradicted, and the distortion standard being violated.

The procedural sequence is:

Standard: IHRA Working Definition of Holocaust Denial and Distortion, adopted by IHRA in 2013.

Notice: April 2019 expert chairs' statement applying the standard to LGGRTC's treatment of Noreika.

Opportunity to Cure: Seven years. Lithuania's Presidential Commission rejected LGGRTC's method on April 11, 2019; the Lithuanian Institute of History declined to collaborate with LGGRTC on the Noreika materials; the Streikus expert council notified the Seimas on March 22, 2026, that it could not work with LGGRTC under its current leadership. The LGGRTC materials remain in place.

Refusal of Cure: Established by the seven-year persistence of the rescuer framing, the December 22, 2020 LGGRTC reply dismissing congressional inquiry as "the opinion of a politician, not a new historical source," and the absence of any formal Lithuanian state response to the IHRA statement itself.

Escalation: Lithuania moved from refusing to cure the state-memory problem to using Article 170² § 1 against a Jewish citizen (Fridman, October 30, 2025) while the same statute was applied to a Lithuanian party leader (Žemaitaitis, December 4, 2025) in the opposite direction — establishing both that the statute is operative and that its application is structurally asymmetric.

These elements establish a cure-default case. The matter before IHRA is no longer the original distortion. It is the institutional refusal to cure the conduct identified by the Alliance's own experts under the Alliance's own standard. The petition asks IHRA to recognize this procedural posture and to apply the institutional remedies its structure permits.

IV. The Counts

The petition states seven counts, each headed in the operative wording of IHRA's own anti-distortion standard or related instruments. Each count is followed by a record paragraph and a finding paragraph. Exhibit references are listed in Appendix A.

Count I. Distortion of the Holocaust under IHRA's Working Definition

IHRA standard. "Intentional efforts to excuse or minimize the impact of the Holocaust or its principal elements, including collaborators and allies of Nazi Germany" constitute Holocaust distortion under IHRA's Working Definition.

Record. Jonas Noreika signed orders connected to the ghettoization and expropriation of Jews in the Šiauliai district in 1941, preserved in the Lithuanian Central State Archive (fund R-1099). LGGRTC, a state-funded institution established under Lithuanian law and operating within Lithuania's official historical-memory architecture, has publicly framed Noreika as a rescuer of Jews and as a figure whose later anti-Soviet record exculpates him from Holocaust-era conduct. IHRA's expert chairs identified this framing in April 2019 as an effort to excuse or minimize a collaborator's role.

Finding. LGGRTC's conduct on the Noreika file falls within the conduct IHRA's Working Definition was drafted to identify. The State of Lithuania is not a passive observer of this conduct; LGGRTC is a state-funded institution operating under state authority and whose outputs carry state weight in public memory, education, and now criminal enforcement. Lithuania's failure to correct LGGRTC's outputs after IHRA notice converts institutional inaction into institutional adoption.

Count II. Demographic Substitution as Structural Distortion

IHRA standard. The Working Definition identifies as distortion attempts "to blur the responsibility for the establishment of concentration and death camps devised and operated by Nazi Germany by putting blame on other nations or ethnic groups" and analogous attempts to shift, reframe, or displace responsibility.

Record. Lithuanian public memory systematically elevates the small fraction of the prewar Lithuanian population recognized by Yad Vashem as Righteous Among the Nations — approximately 0.04 percent measured against Lithuania's prewar general population — to represent the wartime record of the whole. This demographic substitution operates as displacement: the rescue fraction is offered as the moral identity of the state while the wartime record of the remaining 99.96 percent — spanning documented perpetrator conduct (local participation in killing units, white-armor formations, auxiliary police, ghetto administration, property liquidation) and the surrounding population of bystanders and non-rescuers within which that conduct was enabled and tolerated — is moved out of public memory architecture. The destruction was near-total. Of approximately 220,000 Lithuanian Jews living in the territory at the time of the German invasion in June 1941, approximately 212,000 were murdered — a destruction rate of approximately 95 to 96 percent, the highest in Nazi-occupied Europe. The contemporary Lithuanian Jewish community numbers approximately 2,400.

Sources. Yad Vashem's [Lithuanian Righteous Among the Nations list](#) provides the numerator. The destruction figures (approximately 212,000 of approximately 220,000 pre-invasion Lithuanian Jews murdered) are established in the standard scholarly literature, including Jäger Report tabulations, the Dieckmann scholarship, the Stahlecker reporting (Document L-180), and Yad Vashem's Lithuania research portfolio.

No collective guilt. This count does not allege collective guilt against Lithuanians as a people. It alleges institutional substitution by the Lithuanian state. The petition distinguishes throughout among individual rescuers, individual perpetrators, state administrators of the Holocaust-era apparatus, contemporary state institutions, bystanders, and postwar memory authorities. The violation is the contemporary state's use of one category to obscure the others.

Finding. The demographic substitution mechanism is itself a structural distortion under IHRA standards. It is not the existence of the rescue record that is at issue; the rescue record exists and the rescuers should be honored. It is the use of the rescue record as a displacement instrument for the

perpetrator record. Lithuania's state memory architecture has been built around this substitution for decades.

Count III. Selective Criminal Enforcement of Article 170²

Record. Article 170² § 1 of the Lithuanian Criminal Code criminalizes the public approval, denial, or gross trivialization of crimes recognized by Lithuania, including the Holocaust. The statute exists in symmetrical form on its face. Its enforcement is structurally asymmetric.

Enforcement against a Jewish citizen. On October 30, 2025, the Vilnius District Prosecutor filed a 220-page indictment in Criminal Case No. 02-2-00512-24 against Artur Fridman, a Lithuanian Jewish citizen, under Article 170² § 1 and Article 313 § 2. The conduct charged was a Facebook post written at his grandfather's grave on May 9, 2024. The post discussed the state rehabilitation of Adolfas Ramanauskas-Vanagas. LGGRTC's own letter Reference 13R-645 dated September 2, 2025 confirms Ramanauskas-Vanagas's documented Soviet security-service contact under the registered codename Džūkija, archival reference LYA f. K-41, ap. 1, b. 205, l. 19. Fridman's grandfather Aron Fridman was a Red Army volunteer against Nazi Germany.

Enforcement against a Lithuanian party leader. On December 4, 2025, the Vilnius Regional Court convicted Remigijus Žemaitaitis, leader of the Nemunas Dawn party, of inciting hatred against Jews and grossly minimizing the Holocaust, fining him 5,000 euros. The conviction was reported by [AP](#) and [Reuters](#).

Non-enforcement against state-aligned distortion. Lithuania has not applied Article 170² § 1 to LGGRTC's documented Noreika framing, despite the petitioner's September 26, 2018 application to the Vilnius District Prosecutor under that statute, the April 2019 IHRA expert finding, the December 22, 2020 LGGRTC "opinion of a politician" reply, and seven years of public record.

Finding. The statute exists. The statute is operative. The statute is being applied to a Jewish citizen at the level of a 220-page indictment while not being applied to the state-aligned distortion identified by IHRA experts in 2019. The asymmetry of application is itself the violation. It is also the operative form of the cure-default: Lithuania did not merely fail to cure after IHRA notice; it inverted the application of the relevant statute against a Jewish citizen. The asymmetry does not depend on the rhetorical character of any particular statement made by the prosecuted Jewish citizen. Selective enforcement is selective regardless of whether the speech being prosecuted is rhetorically congenial. The contrast at issue is between deliberate, sustained state protection of documented Holocaust perpetrators on one side and opportunistic state prosecution of a Jewish citizen who criticized them on the other.

Count IV. Institutional Refusal of Cure after IHRA Notice

Record. After the April 2019 IHRA expert statement, the Lithuanian Presidential Commission responded on April 11, 2019. The response addressed form and not documentary substance. The signed archival orders were not contested. The rescuer framing was not retracted. LGGRTC's public outputs remained in place. New variations were published. The Lithuanian Parliamentary Ombudsman, in file Reference 4D-2017/1-1558/3D-317, treated the matter as administrative propriety rather than evidentiary integrity. The Streikus expert council formally notified the Seimas on March 22, 2026, that it could not work with LGGRTC under its current leadership. The Lithuanian Institute of History declined to collaborate with LGGRTC on the Noreika materials.

In partial response to the Streikus notification, the LGGRTC Council on April 15, 2026 heard three candidates publicly for the Director General post — sitting Director Arūnas Bubnys, Tuskulėnai

Memorial Complex head Dovilė Lauraičienė, and Donata Kabelkė — and on April 20, 2026 Council Chairman Arūnas Streikus presented Kabelkė's candidacy to Speaker of the Seimas Juozas Olekas with the support of seven of nine Council members. Seimas confirmation is pending. The displacement of Bubnys at the directoral level does not, by itself, address the staff historians whose findings constitute the load-bearing distorted record — among them Alfredas Rukšėnas, who remains in continued LGGRTC employment — nor does it retract any of the Centre's published findings. Personnel substitution at the top is not cure if the documentary outputs and the historians who produced them remain in place.

International Jewish institutional bodies have given Lithuania repeated and explicit notice on the LGGRTC record. The American Jewish Committee, the World Jewish Congress, the European Jewish Congress, and the Lithuanian Jewish Community have formally warned Lithuania about Holocaust distortion at LGGRTC. IHRA-linked authorities including former IHRA chair Ambassador Georges Santer and Professor Yehuda Bauer have invoked the IHRA Working Definition of Holocaust Denial and Distortion directly against the Centre. Despite this institutional consensus, Lithuania has not corrected the findings; it has preserved the machinery that produced them.

Finding. Refusal of cure is not inferred; it is documented by the persistence of LGGRTC outputs after the affected state institutions, including the Presidential Commission and the Institute of History, declined to certify the method. Lithuania's own institutional ecosystem and the international Jewish institutional consensus have both communicated to Lithuania that the LGGRTC record requires correction. Lithuania has not corrected the record. The conduct under review by IHRA is no longer LGGRTC alone but the State of Lithuania's refusal to act on its own institutional findings after seven years of cumulative notice.

Count V. State Defense of LGGRTC as National-Honor Instrument

Record. Where Count IV documents the absence of cure, Count V documents what Lithuania has affirmatively defended in its place: LGGRTC operating not as a scholarly institution but as an instrument of state honor defense, by acknowledgment of LGGRTC's own staff, by acknowledgment of Lithuania's own parliament, and by acknowledgment of Lithuania's own filed legal position.

On February 28, 2019, in litigation brought by the petitioner, LGGRTC, through its state-funded counsel attorney Liudvika Meškauskaitė, filed a legal defense advancing the proposition that Jonas Noreika 'could not have possibly understood' the meaning of orders he himself signed. The defense is functionally identical to the cog-in-the-machinery position rejected by the Israeli court in the 1961 Eichmann trial. The historians deployed alongside the filing were Alfredas Rukšėnas, who remains in continued LGGRTC employment, and Arūnas Stančikas, who has since departed the institution. Seven years after the IHRA expert statement, the Lithuanian state has not retracted the filing. The Eichmann-pattern defense of a Holocaust-era perpetrator remains the Lithuanian state's filed legal position on the documentary record.

LGGRTC's institutional character has been described by its own staff and by Lithuania's own parliament. On August 11, 2023, in an exposé by Lithuanian journalist Arkadijus Vinokuras, LGGRTC historian Dr. Alfredas Rukšėnas publicly admitted that LGGRTC is not a scientific center but serves 'nationalist, pro-Nazi, political interest groups.' In a February 10, 2021 Seimas oversight discussion, members of Lithuania's parliament stated on the record that LGGRTC 'is not a scientific, academic institution.' On April 1, 2021, sitting Member of the Seimas Mindaugas Puidokas stated on the floor of the Lithuanian Parliament — and the statement appears in the

official Seimas stenogram — that LGGRTC ‘had never yielded to pressure: defending Lithuania’s honor, it had even won court cases against the professional blackener of Lithuania, G. A. Gochin.’ The framing converts LGGRTC’s litigation outputs from scholarly findings into instruments of state honor defense.

Finding. A research institution whose own staff historian has publicly characterized it as serving nationalist, pro-Nazi political interest groups, whose institutional character has been described by Lithuania’s parliament as non-scientific, and whose litigation is described by a sitting Member of the Seimas on the parliamentary record as defending Lithuania’s honor against a named Jewish American complainant is not, on Lithuania’s own institutional record, the independent scholarly institution Lithuania presents internationally. Lithuania has not merely failed to cure the conduct IHRA identified; Lithuania has filed and preserved court positions defending it, and parliamentary speech characterizing its defense as a matter of national honor. Cure is the absence of action; affirmative state defense is action in the opposite direction.

Count VI. Diplomatic Laundering of Holocaust-Memory Credentials

Record. Lithuania invokes IHRA membership when seeking international Holocaust-memory legitimacy, while declining to apply IHRA’s anti-distortion standard to the conduct IHRA experts identified. ICAN sent a [formal letter](#) with twelve questions to Consul General Brikaitė on March 17, 2026; Lithuania’s [April 13, 2026 reply](#) answered the procedural questions and refused four structural ones. Rep. Brad Sherman has corresponded with Lithuanian leadership on the institutional matter since September 25, 2019, [compiled at TOI](#). Forty-nine formal submissions to Lithuanian state bodies since 2015, [compiled in the Lithuania litigation inventory](#), record the pattern.

Finding. Engagement without answers becomes the appearance of accountability without the burden of accountability. The pattern is operational: Lithuania has built an architecture in which the appearance of compliance substitutes for compliance, and in which the institutions designed to extend international legitimacy — IHRA membership, NATO alliance, EU institutional standing, bilateral Jewish-community engagement — are used to insulate the very memory apparatus those institutions were designed to discipline. IHRA membership is the highest such credential in the Holocaust-memory space. If membership confers immunity from the Alliance’s own expert findings, the credential is doing the opposite of what it was designed to do.

Count VII. Educational, Memorial, and State-Sponsored Honor Architecture

Record. Lithuania has not produced the due-diligence files supporting state honors, rehabilitations, and commemorative claims concerning figures whose Holocaust-era, wartime, or state-memory records have been materially challenged. The figures include but are not limited to Jonas Noreika (state honors), Juozas Brazaitis-Ambrazevičius (state rehabilitation, congressional record archive), Kazys Škirpa (street naming in Kaunas), Juozas Krikštaponis (monument in Ukmergė), Antanas Baltūsis-Žvejys (state recognition), Adolfas Ramanauskas-Vanagas (state-elevated head-of-state recognition under Seimas Resolution 2018), and Stasys Lukyšas-Jakys. Documentary anchors for the Brazaitis file inventory and the Škirpa reply file are inventoried in Appendix A as Exhibits B-7 and B-8 respectively; archival anchors for the Noreika file are inventoried as B-10 and B-18. The institutional record on these honors involves a partial 2019 municipal action, nationalist reversal, prosecutorial criticism of the corrective gesture, and continuing state-level honor architecture. In late July 2019, Vilnius Mayor Remigijus Šimašius ordered removal of the Noreika memorial plaque from the wall of the Vrublevskiai Library of the Lithuanian Academy of Sciences, and the Vilnius City Council voted to rename Škirpa Street.

Within weeks, the nationalist organization Pro Patria reinstalled a new Noreika plaque at the same Vrublevskiai Library location, with an added inscription emphasizing Noreika as a Stutthof concentration camp prisoner — presenting him as a Nazi victim rather than as the signatory of orders for the ghettoization and expropriation of Jews of the Šiauliai district. The Lithuanian General Prosecutor’s Office subsequently found that Šimašius had ‘exceeded his power’ in ordering the original removal. The replacement plaque was later removed during library renovations. The broader Lithuanian state honor architecture remains intact: LGGRTC’s published findings characterizing Noreika as a rescuer have not been withdrawn; the historical certificates issued in his name and in the names of Brazaitis, Škirpa, and the other figures named above remain operative; the parliamentary recognitions and state honors registry entries remain; the educational and memorial materials curated by the Lithuanian Ministry of Education and the Lithuanian Heritage Department remain. The municipal-plaque sequence demonstrates the structural point: where a Lithuanian state institution undertakes a partial corrective gesture, the General Prosecutor’s Office characterizes it as ultra vires, while the underlying national honor architecture remains in place notwithstanding the documentary record collected in the petitioner’s [litigation inventory](#).

Finding. The honor architecture is the public face of the distortion. It places the documented perpetrators in the symbolic register of the state. Educational and memorial outputs reach the public who will never read LGGRTC’s underlying file. The corrective-action benchmarks in Section VIII address this architecture directly.

V. Public Record Roadmap

This petition is not the public record. It points to a public record that is already in place and continues to develop in the days surrounding this filing. The principal anchors are:

Primary archival exhibits (Appendix A, exhibit numbers): the signed Noreika orders in fund R-1099, the LGGRTC December 22, 2020 reply, the Streikus council March 22, 2026 notification, the Fridman pre-trial investigation file (Case No. 02-2-00512-24), the AP and Reuters reports on the Žemaitaitis conviction, the Brikaitė May 27, 2026 written acknowledgment, the ICAN March 17 letter and April 13 Lithuanian reply.

Institutional exhibits: the 2019 IHRA expert statement, the Stockholm Declaration, the 2020 IHRA Ministerial Declaration, the IHRA Working Definition of Holocaust Denial and Distortion, the Yad Vashem Lithuanian Righteous list and historical-background page.

Contemporaneous public-record predicate: Appendix B lists the four-piece wave of articles published in Times of Israel May 27–28, 2026, each operating in a distinct register — procedural (Gochin), archival (Foti), evidentiary (Levin), diplomatic (Hosier).

Litigation inventory: the forty-nine formal submissions to Lithuanian state bodies since 2015, compiled at the TOI CDN inventory cited above.

These are referenced where load-bearing in the counts above. The petition does not request that IHRA adjudicate each underlying document. It requests that IHRA recognize the record’s sufficiency to trigger the institutional response set out in Section VII.

VI. Questions Lithuania Must Answer

The Alliance's expert bodies should require written Lithuanian answers to the following questions. The first reflects the 2019 procedural moment. The remainder reflect the cure-default record assembled since.

1. Has Lithuania formally answered IHRA's 2019 statement on LGGRTC and Jonas Noreika? If so, the Alliance should publish the response. If not, the absence is itself the answer to the cure-default question.
2. Does Lithuania dispute the documentary record that Noreika signed orders connected to ghettoization and expropriation in the Šiauliai district in 1941?
3. Does Lithuania still rely on LGGRTC's Noreika rescuer theory? If so, what evidence of direct rescue activity supports it?
4. Has LGGRTC supplied, shaped, reviewed, or influenced any historical evidence or framing in Criminal Case No. 02-2-00512-24 (Fridman)?
5. Does Lithuania distinguish Holocaust denial from criticism of Holocaust collaborators it chooses to honor? If so, on what published criterion?
6. What facts in Fridman's May 9, 2024 statement does Lithuania allege are false? Which specific factual basis supports criminal exposure?
7. Which yizkor or testimonial records does Lithuania dispute, and on what evidentiary basis?
8. What is Lithuania's current position on Noreika, Brazaitis, Škirpa, Krikštaponis, Baltūsis-Žvejys, Ramanauskas-Vanagas, and Lukyšas-Jakys? Is the state still asserting that the archival record exonerates each?
9. Will Lithuania produce the due-diligence files behind these honors and rehabilitations for IHRA expert review?
10. Why was Article 170² not applied symmetrically to state-aligned Holocaust distortion before, during, or after the April 2019 IHRA expert finding?

VII. Relief Requested

The petitioner requests the following institutional relief, in sequence:

- 1. Referral.** Referral of this petition to the IHRA Committee on Antisemitism and Holocaust Denial, the Academic Working Group, the Memorials and Museums Working Group, and the Education Working Group, for review under the Working Definition of Holocaust Denial and Distortion, the Stockholm Declaration, and the 2020 Ministerial Declaration.
- 2. Required written response from Lithuania.** A written Lithuanian response to the questions in Section VI, transmitted to IHRA within a defined period.
- 3. Publication.** Publication or public summary of Lithuania's response, consistent with IHRA practice, together with this petition, in the same manner that the 2019 expert statement remains published.
- 4. Corrective-action process.** An IHRA-monitored corrective-action process keyed to the benchmarks in Section VIII, with staged review at three-, six-, and twelve-month intervals.
- 5. Reasoned public assessment within ninety days.** A reasoned public assessment by the relevant IHRA expert bodies of Lithuania's compliance with the Working Definition and the cure obligations following the 2019 statement.

6. Conditional escalation. If the corrective-action process produces no measurable compliance with the benchmarks in Section VIII, the petition requests that IHRA consider suspension, downgrade, or revocation of Lithuania’s Member-Country status under the Alliance’s institutional procedures, with the framework and rationale published.

Each of these forms of relief lies within the existing institutional competence of IHRA. None requires the creation of new procedures. The petition asks only that the procedures the Alliance has been applied to the Member Country its own experts identified.

VIII. Corrective-Action Benchmarks

The corrective-action process requested in Section VII should be keyed to defined institutional and documentary benchmarks. The petitioner proposes the following framework. The benchmarks are staggered to acknowledge institutional reality — leadership change and document withdrawal cannot occur on a single day — and to provide IHRA with measurable interim review points.

Phase 1 (within 90 days of IHRA referral)

- Lithuanian state-level public acknowledgment of the 2019 IHRA expert statement as institutionally authoritative for purposes of LGGRTC compliance.
- Withdrawal from LGGRTC’s public outputs of the Noreika rescuer framing as currently formulated, pending corrective revision.
- Public disclosure by Lithuania of whether LGGRTC supplied, shaped, reviewed, or influenced evidence or historical conclusions in Criminal Case No. 02-2-00512-24, together with an IHRA request that no criminal proceeding rely on unrepaired or unreviewed LGGRTC historical conclusions while the corrective process is underway.

Phase 2 (within 6 months)

- Publication by LGGRTC of a corrected Noreika file under independent expert review, with primary archival exhibits, evidence of direct rescue activity (if asserted), and a published methodology for the institution’s assessment of collaborator-figure rehabilitation.
- Completion of the LGGRTC Director General succession (Kabelké confirmation if proceeding, or alternative qualified candidate) consistent with the Streikus expert council’s March 22, 2026 notification, AND substantive review of the published findings produced by Alfredas Rukšėnas and other staff historians whose outputs constitute the load-bearing distorted record, with explicit retraction or correction of those findings the Centre cannot defend against the documentary record.
- Production by Lithuania of due-diligence files supporting state honors and rehabilitations of named Holocaust-era figures (Section IV, Count VII).
- Symmetrical application of Article 170² § 1 to state-aligned distortion already in the public record, or a published reasoned explanation for non-application.

Phase 3 (within 12 months)

- Documented LGGRTC leadership change, where the Streikus council’s finding of inability to work with the current leadership is not resolved by a published institutional response within Phase 2.
- For each Holocaust-era honored figure named in Count VII, Lithuanian state publication of the due-diligence record supporting the honor — the documentary basis on which the honor was conferred, the assessment of Holocaust-era conduct, and the institutional reasoning for

retaining the honor in light of the documentary record. The benchmark is production and publication by Lithuania, not revision by IHRA; IHRA is asked only to require the production, not to dictate the outcome.

- Educational-curriculum review under the IHRA Recommendations on Teaching and Learning about the Holocaust, with reporting to the IHRA Education Working Group.
- Published reasoned Lithuanian state position on the 0.04% / 99.96% demographic-substitution distortion mechanism identified in Count II.

If Phase 1 produces no measurable compliance, IHRA should publish a reasoned interim assessment and the Phase 2 framework should be reviewed for escalation. If Phase 3 ends with the benchmarks substantially unmet, the conditional escalation contemplated in Section VII (6) becomes operative. The petitioner does not propose specific suspension or revocation procedures; those lie within the Alliance's institutional discretion.

IX. Standing of the Petition Against Substantive Defenses

Lithuania is likely to raise five categories of substantive defense. Each is anticipated and answered below. The purpose is not to prejudge Lithuania's response but to demonstrate that the cure-default frame survives each defense on its own terms.

Defense 1. Lithuanian rule-of-law standing (EU member, NATO ally, independent judiciary, IHRA member).

Each of those credentials creates obligations rather than dispensing with them. The petition does not contest Lithuania's EU or NATO status. The petition contests the use of those credentials as evidence of compliance with the Working Definition. The Žemaitaitis conviction confirms that Lithuanian courts can and do enforce Article 170² § 1 against Holocaust distortion. The asymmetry is the issue, not the existence of the institutional system.

Defense 2. The Noreika file is historically contested.

The contest exists — between LGGRTC on one side and IHRA's expert chairs, the Lithuanian Presidential Commission, the Lithuanian Institute of History, the Streikus expert council, the Lithuanian Jewish Community, Yad Vashem-referenced testimony, the Foti family record, and a documented archival corpus on the other. The petition does not ask IHRA to resolve the historical contest. It asks IHRA to recognize that the body that defines the Alliance's standard has already applied it.

Defense 3. The Fridman prosecution is an independent judicial matter.

Independent judicial process does not exclude the cure-default question. If LGGRTC, whose method IHRA experts flagged, has supplied evidence in the case, the entanglement is a fact under review. If LGGRTC has not, Lithuania can say so plainly and the question dissolves. The petition does not ask IHRA to decide the criminal case. It asks Lithuania to disclose the institutional relationship.

Defense 4. The 2019 IHRA statement is non-binding.

The IHRA Working Definition is also formally non-binding. Neither status weakens the petition. The petition does not assert that the 2019 statement compelled Lithuania to act. It asserts that Lithuania's subsequent refusal to act, after the body that defines the standard applied the standard, is itself the conduct now before IHRA. The non-binding status of the 2019 statement is precisely what required Lithuania to choose. Lithuania chose not to cure.

Defense 5. The petitioner has a long-standing dispute with the Lithuanian state.

The petitioner is a documented complainant before the Lithuanian state apparatus and the holder of a Lithuanian state “public person” determination (S-424, April 25, 2022). Those facts confirm rather than undermine standing. The petition is not advanced as the resolution of the petitioner’s personal grievance. It is advanced as an institutional matter for the Alliance, with the petitioner as the documented party who exhausted the available domestic avenues prior to filing. The domestic rejections in that record have been procedural — statutory deadlines, jurisdictional refusals, administrative-court findings of non-justiciability — not findings on the archival merits of the petitioner’s historical claims. No Lithuanian court or institutional body has adjudicated the documentary record of Jonas Noreika’s administrative conduct in 1941 and found the petitioner’s representation of that record inaccurate.

X. Protective Filing Statement

Because this is a protective filing submitted during an active notice window, the petitioner will supplement this filing with Lithuania’s response or documented non-response, the executed declarations of the wave authors as they are received, final exhibit pagination, English translations of source-language documents where required, and any additional delegation correspondence relevant to the protective-filing period. The petition is complete as to legal posture; the supplement will add documentary completeness to the exhibit record.

Appendix A. Claim-to-Exhibit Crosswalk

Each count is supported by the exhibits below. Exhibit-numbering will be finalized with the protective-filing dossier. URLs cited are stable institutional or TOI CDN documents.

Exhibit Set A — IHRA Institutional Predicate (Counts I, III, IV, V)

A-1. IHRA April 2019 expert chairs’ statement on LGGRTC/Noreika — <https://holocaustremembrance.com/statements/statement-center-study-genocide-resistance-lithuania>

A-2. IHRA Working Definition of Holocaust Denial and Distortion — <https://holocaustremembrance.com/resources/working-definition-holocaust-denial-distortion>

A-3. Stockholm Declaration — <https://holocaustremembrance.com/resources/stockholm-declaration>

A-4. 2020 IHRA Ministerial Declaration — <https://holocaustremembrance.com/resources/2020-ihra-ministerial-declaration>

Exhibit Set B — Lithuanian State Conduct (Counts I, II, IV, VI)

B-1. LGGRTC institutional description and statutory mandate page (Lithuanian Genocide and Resistance Research Centre), archived copy, accessed May 2026 — <https://www.genocid.lt/centras/en/>

B-2. LGGRTC “opinion of a politician” reply, Ref. 14R-2020-11-26, December 22, 2020 (compiled at Sherman correspondence file) — <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Congress-on-Brazaitis.pdf>

B-3. Ombudsman file Reference 4D-2017/1-1558/3D-317, February 2, 2018 — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/4D-2017-1-1558-3D-317-2018-02-02.pdf>

B-4. Yad Vashem Lithuanian Righteous Among the Nations list (numerator for Count II) — <https://www.yadvashem.org/yv/pdf-drupal/lithuania.pdf>

B-5. Lithuania litigation inventory (49 submissions, 2015–2026) — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Lithuania-litigation-inventory-as-of-2026-05-11.pdf>

B-6. Noreika inquiry to LGGRTC, foundational complaint file — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Jonas-Noreika-Inquiry-to-LGGRTC.pdf>

B-7. Brazaitis file inventory (Count VII) — https://static-cdn.toi-media.com/blogs/uploads/2026/05/Brazaitis_File_Inventory_Annotated.pdf

- B-8.** Škirpa reply file (Count VII) — https://static-cdn.toi-media.com/blogs/uploads/2026/05/GC_reply_Skirpa_20180711-1.pdf
- B-9.** Article 170² § 1 criminal application filed by petitioner, September 26, 2018 — <https://static-cdn.toi-media.com/blogs/uploads/2026/04/request-to-start-criminal-action-Holocaust-denial-BK-170-2-GG-2018-09-26.pdf>
- B-10.** Noreika litigation file — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Litigation-file-Noreika.pdf>
- B-11.** Annex No. 46: GRRCL December 2019 second memorandum on Jonas Noreika — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Annex-No-46-GRRCL-2019-December-memorandum-second-memorandum-on-Jonas-Noreika.pdf>
- B-12.** Lithuanian Presidential Commission April 11, 2019 response to IHRA-flagged LGGRTC statement — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/A-Response-to-The-Statement-of-The-Genocide-and-Resistance-Research-C- -www.komisija.lt .pdf>
- B-13.** LGGRTC October 24, 2017 reply No. 14R-94 (institutional admission re LNP Holocaust-collaboration; 20 years of inaction) — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/14R-94.pdf>
- B-14a.** Lithuanian SSR 1989 statute on rehabilitation of persons convicted of certain acts (statutory base for the rehabilitation architecture) — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/2.-1989-ltsr-istatymas-del-asmenu-nuteistu-uz-kaikurias-veikas-reabilitavimo.pdf>
- B-14b.** Lithuanian Supreme Court (LAT) Certificate No. 8-17228, May 27, 1991 (Soviet-era rehabilitation of Noreika) — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/3.-LAT-pazyma-del-JN-reabilitavimo-1991.pdf>
- B-15.** Bernardinai.lt November 12, 2020 interview with MP Valdas Rakutis (false assertion of Supreme Court exoneration of Noreika) — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/1.-Publikacija-Karo-istorikas-V.-Rakutis-%E2%80%9EIstorijai-t.i-tampa-pralaimejimu-Bernardinai.lt .pdf>
- B-16.** JewishGen Lite/Lithuania Yizkor Book research manifest (testimonial corpus of destroyed Lithuanian Jewish communities; Count II denominator anchor) — <https://www.jewishgen.org/yizkor/lita/lita.html>
- B-16-suppl.** JewishGen Lite/Lithuania Yizkor Book — Volume 2 source — <https://www.jewishgen.org/yizkor/lita2/lita2.html>
- B-17.** Streikus expert council notification to the Seimas, March 22, 2026 (council unable to work with LGGRTC under its current leadership; document on file with petitioner)
- B-18.** Šiauliai County Chief Order No. 3687, October 15, 1941, signed by Jonas Noreika, Lithuanian Central State Archive, fund R-1099, list 1, file 2, folio 451 (the load-bearing signed administrative order at the documentary center of the Noreika file; archival reference confirmed by Silvia Foti)
- B-19.** Gochin v. Lithuania, European Court of Human Rights Application No. 10930/21, filed February 11, 2021 (ECHR file closed / no longer pending; the 46-annex documentary record remains evidentiary and includes signed Noreika orders in fund R-1099, the Jäger Report,

Stahlecker reports, Lohse directives, LAF documents, the Pakalniškis memoir, and Holocaust Atlas of Lithuania citations) — https://static-cdn.toi-media.com/blogs/uploads/2026/05/Application_final_scan.pdf

Exhibit Set C — Criminal Enforcement Asymmetry (Count III)

C-1. Fridman pre-trial investigation file, Case No. 02-2-00512-24, 220-page indictment — <https://static-cdn.toi-media.com/blogs/uploads/2026/04/ikiteisminio-tyrimo-medziaga-02-2-00512-24.pdf>

C-2. AP report on Žemaitaitis conviction, December 4, 2025 — <https://apnews.com/article/29e66a87c858671b835a5189f5266e8f>

C-3. Reuters report on Žemaitaitis conviction, December 4, 2025 — <https://www.reuters.com/world/leader-lithuanian-government-party-found-guilty-hatred-against-jews-2025-12-04/>

C-4a. Vilnius District Prosecutor refusal under Article 170² § 1 (Investigation Material No. M-2-02-00825-18, August 17, 2018) — first documented refusal — <https://static-cdn.toi-media.com/blogs/uploads/2026/04/17-August-2018.pdf>

C-4b. Vilnius Public Prosecutor refusal (November 12, 2018) — second documented refusal — https://static-cdn.toi-media.com/blogs/uploads/2026/04/Prosecutor_refusal2.pdf

C-4c. Vilnius Public Prosecutor refusal (November 2019) — third documented refusal; establishes pattern — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/complaint-to-public-prosecutor-english.pdf>

Exhibit Set D — Diplomatic and Notice Record (Counts IV, V; Due Process)

D-1. Pre-submission notice letter from petitioner, May 27, 2026 (Section II)

D-2. Consul General Sandra Brikaitė written acknowledgment, May 27, 2026 17:22 UTC

D-3. Petitioner’s IHRA transmittal cover letter, May 27, 2026

D-4. ICAN formal letter to Consul General Brikaitė, March 17, 2026 — https://static-cdn.toi-media.com/blogs/uploads/2026/05/ICAN_CA_LETTER_LTCG_031726.pdf

D-5. Lithuanian reply to ICAN, April 13, 2026 — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/LT-Brikaite-reply-to-ICAN.pdf>

D-6. Rep. Brad Sherman correspondence file with Lithuanian leadership (2019–2026) — <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Congress-on-Brazaitis.pdf>

D-7. Open letter from petitioner to Consul General Brikaitė — <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Letter-to-Consul-General-Brikaite.pdf>

Appendix B. Contemporaneous Public Record (Wave of May 27–28, 2026)

The following four pieces, published in Times of Israel in the days surrounding this filing, constitute the contemporaneous public-record predicate for the petition. Each operates in a distinct register; together they cover the procedural, archival, evidentiary, and diplomatic dimensions of the cure-default case.

B-1. Procedural anchor

Grant A. Gochin, [“IHRA Was Warned in 2019. Lithuania Did Not Cure.”](https://blogs.timesofisrael.com/ihra-was-warned-in-2019-lithuania-did-not-cure/) Times of Israel, May 27, 2026. URL: <https://blogs.timesofisrael.com/ihra-was-warned-in-2019-lithuania-did-not-cure/>.

B-2. Archival anchor

Silvia Foti, [“What Lithuania Did With the Signature.”](https://blogs.timesofisrael.com/what-lithuania-did-with-the-signature/) Times of Israel, May 28, 2026. URL: <https://blogs.timesofisrael.com/what-lithuania-did-with-the-signature/>. The piece places Šiauliai County Chief Order No. 3687 (October 15, 1941, fund R-1099, list 1, file 2, folio 451) at the center of the case and states the coordination of the wave on the record.

B-3. Evidentiary anchor

Eugene J. Levin, [“The Witness IHRA Already Warned About.”](https://blogs.timesofisrael.com/the-witness-ihra-already-warned-about/) Times of Israel, May 28, 2026. URL: <https://blogs.timesofisrael.com/the-witness-ihra-already-warned-about/>. Converts the cure-default frame into an evidentiary problem inside the Fridman criminal proceeding.

B-4. Diplomatic anchor

Dillon Hosier, [“The Questions IHRA Must Ask Lithuania.”](https://blogs.timesofisrael.com/the-questions-ihra-must-ask-lithuania/) Times of Israel, May 28, 2026. URL: <https://blogs.timesofisrael.com/the-questions-ihra-must-ask-lithuania/>. Documents the ICAN → Brikaitė March 17, 2026 letter, the April 13, 2026 Lithuanian reply, and the four structural questions Lithuania refused to answer.

Companion public-record citations referenced in the counts

B-5. Grant A. Gochin, [“The Eichmann Defense,”](#) Times of Israel. Documents the February 28, 2019 LGGRTC court filing and the historians deployed alongside it. Load-bearing for Count IV (Eichmann-pattern defense filed by the Lithuanian state and never retracted).

B-6. Eugene J. Levin, [“Lithuania Confessed from the Floor of Parliament,”](#) Times of Israel. Documents the April 1, 2021 Puidokas Seimas floor statement. Load-bearing for Count IV (Lithuania’s own parliamentary characterization of LGGRTC litigation as state honor defense).

B-7. Eugene J. Levin, [“The Witness That Cannot Survive Cross-Examination, Part I,”](#) Times of Israel. Develops the S-424 reciprocity argument. Load-bearing for Section I (standing).

B-8. Eugene J. Levin, [“How Lithuania Converts Holocaust Evidence into State Innocence,”](#) Times of Israel. Documents the international institutional consensus (American Jewish Committee, World Jewish Congress, European Jewish Congress, Lithuanian Jewish Community, and IHRA-linked authorities) on the LGGRTC record. Load-bearing for Count IV (international notice and institutional refusal of cure).

B-9. Grant A. Gochin, [“After the truth, questions:”](#) Times of Israel, August 30, 2023. Anchors the Rukšėnas August 11, 2023 admission via the Vinokuras Lithuanian press exposé. Load-bearing for Count V (state defense of LGGRTC).

B-10. Grant A. Gochin, [“Lithuania Closes the Loop,”](#) Times of Israel. Anchors the February 10, 2021 Seimas oversight finding that LGGRTC ‘is not a scientific, academic institution.’ Load-bearing for Count V (state defense of LGGRTC).

Appendix C. Reference Inventory

Cross-references to the petitioner’s published corpus and the institutional inventories that support the counts above.

Petitioner’s published Substack articles cited or load-bearing

- “Membership by Violation” (ten-form distortion catalogue applied to Lithuania) — <https://grantgochin.substack.com/p/membership-by-violation-lithuania>
- “How Lithuania Discredited Its Witness” (LGGRTC methodological discrediting of Aleksandras Pakalniškis) — <https://grantgochin.substack.com/p/how-lithuania-discredited-its-witness>
- “Where Was Vanagas in 1941?” (Ramanauskas-Vanagas Holocaust-era due-diligence record) — <https://grantgochin.substack.com/p/where-was-vanagas-in-1941>

Petitioner’s Times of Israel articles cited or load-bearing

- “Before Lithuania Prosecuted Fridman, It Warned Me” — <https://blogs.timesofisrael.com/before-lithuania-prosecuted-fridman-it-warned-me/>
- “IHRA Was Warned in 2019. Lithuania Did Not Cure.” (wave article) — <https://blogs.timesofisrael.com/ihra-was-warned-in-2019-lithuania-did-not-cure/>
- “The Eichmann Defense” — <https://blogs.timesofisrael.com/the-eichmann-defense/>
- “After the truth, questions:” — <https://blogs.timesofisrael.com/after-the-truth-questions/>
- “Lithuania Closes the Loop” — <https://blogs.timesofisrael.com/lithuania-closes-the-loop/>

Allied authors’ anchor pieces

- Silvia Foti, “The Signature that Still Haunts Lithuania” — <https://blogs.timesofisrael.com/the-signature-that-still-haunts-lithuania/>
- Silvia Foti, “What Lithuania Did With the Signature” (wave article) — <https://blogs.timesofisrael.com/what-lithuania-did-with-the-signature/>
- Eugene J. Levin, “The Witness IHRA Already Warned About” (wave article) — <https://blogs.timesofisrael.com/the-witness-ihra-already-warned-about/>
- Dillon Hosier, “The Questions IHRA Must Ask Lithuania” (wave article) — <https://blogs.timesofisrael.com/the-questions-ihra-must-ask-lithuania/>
- Eugene J. Levin, “Lithuania Confessed from the Floor of Parliament” — <https://blogs.timesofisrael.com/lithuania-confessed-from-the-floor-of-parliament/>
- Eugene J. Levin, “The Witness That Cannot Survive Cross-Examination, Part I” — <https://blogs.timesofisrael.com/the-witness-that-cannot-survive-cross-examination-part-i/>
- Eugene J. Levin, “How Lithuania Converts Holocaust Evidence into State Innocence” — <https://blogs.timesofisrael.com/how-lithuania-converts-holocaust-evidence-into-state-innocence/>

Institutional inventories

Forty-nine formal submissions to Lithuanian state bodies since 2015 are compiled at the [Lithuania litigation inventory](#). Composition: 8 lawsuits/international, 11 LGGRTC, 5 Article 170-2 § 1, 11 institutional, 2 Journalist Ethics, 12 letters. ECHR App. 10930/21 is inadmissible/closed.

Requested Initial IHRA Action

The full relief sequence contemplated by this petition is set out in Section VII and the corrective benchmarks in Section VIII. The petitioner recognizes that the Alliance's institutional processes operate in measured steps. To facilitate the Alliance's first action on this filing, the petitioner respectfully requests, as initial steps and without prejudice to the broader relief sequence:

- 1.** Acknowledgment of receipt of this petition by the IHRA Chair and Secretary General, confirming that the filing is institutionally before the Alliance.
- 2.** Circulation of the petition and bound exhibit dossier to the Heads of Delegation and to the relevant expert working groups and committees, including but not limited to the Committee on Antisemitism and Holocaust Denial, the Academic Working Group, the Memorials and Museums Working Group, and the Education Working Group.
- 3.** Referral of the underlying anti-distortion question to those expert bodies for institutional assessment under IHRA's Working Definition of Holocaust Denial and Distortion, building on the 2019 expert statement chain that the petition treats as the operative notice point.
- 4.** Communication to the Republic of Lithuania requesting a written response to the petition within a reasonable comment window, with publication or public summary of that response consistent with IHRA practice once received.
- 5.** Express preservation of the Alliance's right to assess any further institutional steps — including but not limited to those contemplated in Sections VII and VIII of this petition — after Lithuania's written response has been received and reviewed.

These initial steps neither prejudice nor foreclose the relief sequence in Sections VII and VIII. They are the institutional minimum the petitioner respectfully requests as the Alliance's first action on a filing of this scope.

End of Petition. Respectfully submitted under reservation of the right to supplement.

DECLARATION

Declaration of Grant Arthur Gochin, Petitioner

In support of the Formal Petition to the International Holocaust Remembrance Alliance concerning the Republic of Lithuania

I, Grant Arthur Gochin, of 10900 Winnetka Avenue, Chatsworth, California 91311, United States of America, declare the following:

1. I am the petitioner in the Formal Petition to the International Holocaust Remembrance Alliance for the Review, Corrective Action, Suspension, Downgrade, or Revocation of the Member-Country Status of the Republic of Lithuania, filed in protective form in early June 2026.
2. I am a Litvak descendant. My family was murdered in the Lithuanian Holocaust. I have documented Lithuanian state conduct against IHRA's anti-distortion standard for over a decade.
3. I am the author of the article "IHRA Was Warned in 2019. Lithuania Did Not Cure." published in the Times of Israel on May 27, 2026, at <https://blogs.timesofisrael.com/ihra-was-warned-in-2019-lithuania-did-not-cure/>. The article is cited as Exhibit B-1 in the petition's public-record predicate (Wave Index). I affirm the accuracy of the documentary and chronological record it represents.
4. I have submitted, since 2015, forty-nine documented formal submissions to Lithuanian state bodies seeking correction of the documented record concerning Jonas Noreika, Juozas Brazaitis-Ambrazevičius, Kazys Škirpa, and related state-honored figures. These submissions are compiled in the Lithuania litigation inventory at <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Lithuania-litigation-inventory-as-of-2026-05-11.pdf>. I affirm the inventory is an accurate record of those submissions. The composition is eight lawsuits and international filings, eleven submissions to the Lithuanian Genocide and Resistance Research Centre, five applications under Article 170² § 1 of the Lithuanian Criminal Code, eleven institutional submissions, two complaints to the Office of the Journalist Ethics Inspector, and twelve formal letters to Lithuanian state officials.
5. I am the holder of the Lithuanian Journalist Ethics Inspector determination No. S-424 dated April 25, 2022, classifying me as a "public person" in Lithuania for purposes of reduced legal protection. I accept that determination as state-issued evidence of my standing in the field of Holocaust accountability in Lithuania.
6. I have read the Formal Petition and the Exhibit Dossier transmitted to the IHRA Chair, the Secretary General, and the Heads of Delegation. I affirm that the facts represented in the petition concerning my own conduct, the chronology of my submissions, the institutional responses I have received, and the published record I have produced are accurate to the best of my knowledge.



7. I consent to citation of my published work and my submission record in this petition and in any subsequent IHRA proceeding, supplement, expert review, or institutional response.
8. This declaration is made by me in good faith. I am willing to provide further information, documents, or testimony on these matters as IHRA expert bodies, working groups, committees, or member delegations may require.

Signed: _____

Grant Arthur Gochin

Petitioner

Date: 5-28-26

EXHIBIT DOSSIER COVER AND INDEX

Companion to the Formal Petition

Formal Petition to the International Holocaust Remembrance Alliance for the Review, Corrective Action, Suspension, Downgrade, or Revocation of the Member-Country Status of the Republic of Lithuania

Petitioner

Grant Arthur Gochin

Litvak descendant

ggochin@gmail.com · +1 818 625 6513

Filing Posture

Protective filing with reservation of the right to supplement

Compilation Date

Compiled 2026-05-28. Anticipated transmittal: today.

Anticipated Filing Window

Filing transmittal: 2026-05-28 (advanced from original June 2–3 window)

Note to Readers

This document is the index of exhibits identifying primary documents cited in the Formal Petition’s Claim-to-Exhibit Crosswalk (Appendix A of the petition). It is not itself a compilation of bound exhibit documents. Public exhibits are available at the URLs listed in the Table of Exhibits below; non-public transmission exhibits (the petitioner’s May 27, 2026 transmittals, the Brikaitė written acknowledgment, the Streikus expert council notification, and certain archival documents) are on file with the petitioner and will be supplied in the supplemental filing. The exhibits are organized into four sets:

Set A — IHRA Institutional Predicate (the 2019 expert statement; the Working Definition; the Stockholm Declaration; the 2020 Ministerial Declaration).

Set B — Lithuanian State Conduct (LGGRTC and Lithuanian-state outputs documenting the conduct identified in 2019 and the seven-year refusal to cure).

Set C — Criminal Enforcement Asymmetry (the Fridman pre-trial file; the Žemaitaitis conviction reporting).

Set D — Diplomatic and Notice Record (the petitioner’s May 27, 2026 pre-submission notice and the Lithuanian written acknowledgment; the IHRA transmittal; the ICAN-to-Brikaitė March 17, 2026 letter and the April 13, 2026 reply; the Sherman congressional correspondence chain).

The index is presented in indexed and hyperlinked form. Source URLs are included for documents in publicly accessible repositories. The index does not include translations; full translations of load-bearing Lithuanian-language exhibits will accompany the supplemental filing.

This is a protective filing. New exhibits, including Lithuania’s response or documented non-response after the June 2, 2026 comment window, will be added in the supplemental filing under the same numbering scheme.

Table of Exhibits

Set A — IHRA Institutional Predicate

- A-1.** IHRA April 2019 expert chairs’ statement on LGGRTC/Noreika — source: <https://holocaustremembrance.com/statements/statement-center-study-genocide-resistance-lithuania> [load-bearing for Counts I, III, IV, V]
- A-2.** IHRA Working Definition of Holocaust Denial and Distortion — source: <https://holocaustremembrance.com/resources/working-definition-holocaust-denial-distortion> [load-bearing for Counts I, II, III, IV]
- A-3.** Stockholm Declaration — source: <https://holocaustremembrance.com/resources/stockholm-declaration> [Lithuania accepted; load-bearing for Counts IV, V]
- A-4.** 2020 IHRA Ministerial Declaration — source: <https://holocaustremembrance.com/resources/2020-ihra-ministerial-declaration> [Lithuania accepted; load-bearing for Counts IV, V]

Set B — Lithuanian State Conduct

- B-1.** LGGRTC institutional description and statutory mandate page (Lithuanian Genocide and Resistance Research Centre), archived copy, accessed May 2026 — source: <https://www.genocid.lt/centras/en/> [institutional identification]
- B-2.** LGGRTC “opinion of a politician” reply, Ref. 14R-2020-11-26, December 22, 2020 (within Sherman compilation) — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Congress-on-Brazaitis.pdf> [load-bearing for Counts I, IV]
- B-3.** Ombudsman file Reference 4D-2017/1-1558/3D-317, February 2, 2018 — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/4D-2017-1-1558-3D-317-2018-02-02.pdf> [load-bearing for Count IV]
- B-4.** Yad Vashem Lithuanian Righteous Among the Nations list (numerator for Count II) — source: <https://www.yadvashem.org/yv/pdf-drupal/lithuania.pdf> [load-bearing for Count II]
- B-5.** Lithuania litigation inventory (49 formal submissions, 2015–2026) — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Lithuania-litigation-inventory-as-of-2026-05-11.pdf> [load-bearing for petitioner’s standing and Counts IV, V]
- B-6.** Noreika inquiry to LGGRTC, foundational complaint file — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Jonas-Noreika-Inquiry-to-LGGRTC.pdf> [load-bearing for Counts I, IV]
- B-7.** Brazaitis file inventory (annotated) — source: https://static-cdn.toi-media.com/blogs/uploads/2026/05/Brazaitis_File_Inventory_Annotated.pdf [load-bearing for Count VI]
- B-8.** Škirpa reply file — source: https://static-cdn.toi-media.com/blogs/uploads/2026/05/GC_reply_Skirpa_20180711-1.pdf [load-bearing for Count VI]

- B-9.** Article 170² § 1 criminal application filed by petitioner, September 26, 2018 — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/04/request-to-start-criminal-action-Holocaust-denial-BK-170-2-GG-2018-09-26.pdf> [load-bearing for Count III (non-application)]
- B-10.** Noreika litigation file — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Litigation-file-Noreika.pdf> [load-bearing for Counts I, IV, VII]
- B-11.** Annex No. 46: GRRCL December 2019 second memorandum on Jonas Noreika — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Annex-No-46-GRRCL-2019-December-memorandum-second-memorandum-on-Jonas-Noreika.pdf> [load-bearing for Counts I, IV]
- B-12.** Lithuanian Presidential Commission April 11, 2019 response to IHRA-flagged LGGRTC statement — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/A-Response-to-The-Statement-of-The-Genocide-and-Resistance-Research-C- -www.komisija.lt .pdf> [load-bearing for Count IV]
- B-13.** LGGRTC October 24, 2017 reply No. 14R-94 (institutional admission re LNP) — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/14R-94.pdf> [Count IV: LGGRTC admits documentary basis for LNP Holocaust-collaboration investigation and twenty years of institutional inaction]
- B-14a.** Lithuanian SSR 1989 statute on rehabilitation of persons convicted of certain acts — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/2.-1989-ltsr-istatymas-del-asmenu-nuteistu-uz-kaikurias-veikas-reabilitavimo.pdf> [Count VII: statutory base for the rehabilitation architecture]
- B-14b.** Lithuanian Supreme Court (LAT) Certificate No. 8-17228, May 27, 1991 (Soviet-era rehabilitation of Noreika) — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/3.-LAT-pazyma-del-JN-reabilitavimo-1991.pdf> [Count VII: documents the rehabilitation instrument later invoked as exoneration]
- B-15.** Bernardinai.lt November 12, 2020 interview with MP Valdas Rakutis (false assertion of Supreme Court exoneration of Noreika) — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/1.-Publikacija-Karo-istorikas-V.-Rakutis-%E2%80%9EIstorijai-t.i-tampa-pralaimėjimu-Bernardinai.lt .pdf> [Counts I and VII: state-aligned distortion through false judicial-exoneration claim]
- B-16.** JewishGen Lite/Lithuania Yizkor Book research manifest (URL navigation index to JewishGen Volumes 1 and 2) — source: <https://www.jewishgen.org/yizkor/lita/lita.html> [Count II: anchor to the testimonial corpus of the destroyed Lithuanian Jewish communities (denominator); paired with B-4 Yad Vashem Righteous list (numerator)]
- B-16-suppl.** JewishGen Lite/Lithuania Yizkor Book — Volume 2 source — source: <https://www.jewishgen.org/yizkor/lita2/lita2.html> [Count II: supplementary Yizkor source for destroyed-community record]
- B-17.** Streikus expert council notification to the Seimas, March 22, 2026 (council unable to work with LGGRTC under its current leadership) [Count IV: documents institutional refusal of cure; from petitioner’s files]
- B-18.** Šiauliai County Chief Order No. 3687, October 15, 1941, signed by Jonas Noreika, Lithuanian Central State Archive, fund R-1099, list 1, file 2, folio 451 [Counts I, III, V, VII: the load-bearing signed administrative order at the documentary center of the Noreika file; archival reference confirmed by Silvia Foti]

B-19. Gochin v. Lithuania, European Court of Human Rights Application No. 10930/21, filed February 11, 2021 (ECHR file closed / no longer pending; documentary annexes remain evidentiary) — source: https://static-cdn.toi-media.com/blogs/uploads/2026/05/Application_final_scan.pdf [Sets I-VII broadly: 46-annex documentary record including signed Noreika orders in fund R-1099, Jäger Report, Stahlecker reports, Lohse directives, LAF documents, Pakalniškis memoir, Holocaust Atlas of Lithuania citations]

Set C — Criminal Enforcement Asymmetry

C-1. Fridman pre-trial investigation file, Case No. 02-2-00512-24, 220-page indictment — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/04/ikiteisminio-tyrimo-medziaga-02-2-00512-24.pdf> [load-bearing for Count III]

C-2. Associated Press report on Žemaitaitis conviction, December 4, 2025 — source: <https://apnews.com/article/29e66a87c858671b835a5189f5266e8f> [load-bearing for Count III (selective enforcement — statute is operative)]

C-3. Reuters report on Žemaitaitis conviction, December 4, 2025 — source: <https://www.reuters.com/world/leader-lithuanian-government-party-found-guilty-hatred-against-jews-2025-12-04/> [load-bearing for Count III]

C-4a. Vilnius District Prosecutor refusal to investigate LGGRTC under Article 170² § 1 (Investigation Material No. M-2-02-00825-18, August 17, 2018) — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/04/17-August-2018.pdf> [Count III: documented prosecutorial refusal to apply Article 170² to state-aligned distortion]

C-4b. Vilnius Public Prosecutor refusal (November 12, 2018) — source: https://static-cdn.toi-media.com/blogs/uploads/2026/04/Prosecutor_refusal2.pdf [Count III: second documented refusal]

C-4c. Vilnius Public Prosecutor refusal (November 2019, within prosecutorial-complaint compilation) — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/complaint-to-public-prosecutor-english.pdf> [Count III: third documented refusal; establishes pattern]

Set D — Diplomatic and Notice Record

D-1. Pre-submission notice letter from petitioner to Lithuanian state apparatus, May 27, 2026 [from petitioner's files; transmitted 17:03–17:11 UTC]

D-2. Consul General Sandra Brikaitė written acknowledgment to petitioner, May 27, 2026 17:22 UTC [from petitioner's files; confirms forwarding to MFA and Embassy]

D-3. Petitioner's IHRA transmittal cover letter, May 27, 2026 [from petitioner's files; transmitted via four parallel channels]

D-4. ICAN formal letter to Consul General Brikaitė, March 17, 2026 — source: https://static-cdn.toi-media.com/blogs/uploads/2026/05/ICAN_CA_LETTER_LTGC_031726.pdf [load-bearing for Count V (diplomatic laundering)]

D-5. Lithuanian reply to ICAN, April 13, 2026 — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/LT-Brikaite-reply-to-ICAN.pdf> [load-bearing for Count V]

D-6. Rep. Brad Sherman correspondence file with Lithuanian leadership, September 25, 2019 through March 20, 2026 — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Congress-on-Brazaitis.pdf> [load-bearing for U.S. institutional interest]

D-7. Open letter from petitioner to Consul General Brikaitė — source: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Letter-to-Consul-General-Brikaite.pdf> [*load-bearing for Counts IV, V*]

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