

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:

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Chair, International Holocaust Remembrance Alliance (Argentine Presidency 2026)

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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-armbander 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 Krikštonis (monument in Ukmergė), Antanas Baltūsis-Žvejys (state recognition), Adolfas Ramanauskas-Vanagas (state-elevated head-of-state recognition under Seimas Resolution 2018), and Stasys Lukyša-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, Krikštonis, 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 (Kabelkė 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-pralaimejimu-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-supp.** 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_LTCG_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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A-2: A-2_IHRA_Working_Definition_Distortion.pdf

A-3: A-3_Stockholm_Declaration.pdf

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B-14a: B-14a_LSSR_1989_Rehabilitation_Statute.pdf

B-14b: B-14b_LAT_Certificate_8-17228_Noreika_Soviet_Rehabilitation_1991-05-27.pdf

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— End of Compilation Index —

**SUPPLEMENT TO THE FORMAL PETITION TO THE
INTERNATIONAL HOLOCAUST REMEMBRANCE ALLIANCE**
concerning the Republic of Lithuania
Documented Non-Response and Record Correction

Petitioner: Grant Arthur Gochin

Reference: Formal Petition transmitted 2026-05-28 23:35 UTC (Member-Country Status Review — Republic of Lithuania)

Filing posture: Supplemental filing under reservation of the right to supplement (Petition § X)

Date: June 3, 2026

Directed to

Mr. Marcelo Mindlin, Chair, IHRA (Argentine Presidency 2026); Ambassador Michaela Küchler, Secretary General, IHRA; the IHRA Permanent Office, Berlin; the Heads of Delegation of IHRA Member Countries; and the Chairs of the IHRA Working Groups and Committees.

Copied for the due-process record: the Republic of Lithuania (Consul General Sandra Brikaitė; the Ministry of Foreign Affairs; the Embassy of Lithuania in Washington, D.C.; the International Commission Secretariat; the LGGRTC Council and Director General); and the United States and Israeli Heads of Delegation.

1. Purpose

This supplement is filed under the reservation of the right to supplement stated in Section X of the petition. It records two developments since transmittal: (a) the close of the Lithuanian comment window without a substantive response, and (b) a correction to one recipient attribution in the petition's distribution. It does not amend the petition's legal posture or any count.

2. Documented Non-Response — Completion of the Due Process Exhibit

On May 27, 2026, the petitioner transmitted pre-submission notice to the Lithuanian state apparatus. Consul General Sandra Brikaitė confirmed receipt in writing the same day at 17:22 UTC and confirmed forwarding to the Lithuanian Ministry of Foreign Affairs and the Embassy of Lithuania in Washington, D.C. Lithuania was afforded a comment window through end of day June 2, 2026.

As of June 3, 2026, the Republic of Lithuania has made no substantive response to the petition or to the questions set out in Section VI. The only communication received from any Lithuanian state channel is the May 27 acknowledgment of receipt and forwarding. Lithuania therefore received the petition — receipt confirmed in writing and forwarded into the Ministry of Foreign Affairs and the Washington embassy — and elected not to engage the merits within its own comment window.

Per Section II of the petition, this documented non-response is incorporated as evidence of refusal to engage on the merits. It completes the Due Process exhibit: Exhibit D-2 now comprises the Brikaitė written acknowledgment of receipt together with the documented absence of any substantive Lithuanian response within the comment window. This supplement is itself served on the Lithuanian recipients, who retain the opportunity to correct the record should Lithuania contend that a substantive response was made; any late response will be incorporated if received.

3. Record Correction — Israeli Head of Delegation Attribution

The petition's distribution identified Ambassador Dani Dayan (Yad Vashem) as the Israeli Head of Delegation to IHRA. On May 29, 2026, Ambassador Dayan advised the petitioner in writing that, following the conclusion of the Israeli Presidency of the Alliance, he is neither the head nor

a member of the Israeli delegation to IHRA, and identified Ms. Iris Rosenberg (Yad Vashem) as the current head of delegation. The petitioner has since transmitted the petition to Ms. Rosenberg and to the Israeli Ministry of Foreign Affairs channel (Ms. Arezoo Hersel-Rohila), and corrects the distribution record accordingly. This correction affects recipient attribution only; it does not alter any allegation, count, or exhibit in the petition.

4. Renewed Request for Initial IHRA Action

With the Lithuanian comment window now closed, the petitioner respectfully renews the request for the initial institutional steps set out in the petition's Requested Initial IHRA Action:

- Acknowledgment of receipt by the Chair and Secretary General;
- Circulation to the Heads of Delegation and the relevant expert working groups and committees;
- Referral of the anti-distortion question to those expert bodies under the Working Definition of Holocaust Denial and Distortion, building on the April 2019 expert-statement chain;
- A communication to the Republic of Lithuania requesting a written response, with publication or public summary consistent with IHRA practice; and
- Preservation of the Alliance's right to assess further institutional steps under Sections VII and VIII of the petition.

5. Further Supplementation Reserved

The petitioner will further supplement with English translations of load-bearing Lithuanian-language exhibits; the executed declarations of the wave authors as received; and any Lithuanian response received after the date of this supplement. The petition remains complete as to legal posture; this supplement and those to follow add documentary completeness to the record.

Respectfully submitted under reservation of the right to supplement.

Grant Arthur Gochin

Litvak descendant · Author, *Malice, Murder and Manipulation* (2013)
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Petition (bound filing): [IHRA-Petition-Gochin-5-28-26.pdf](#)

Supplemental Submission to the International Holocaust Remembrance Alliance

The Attribution of a United States Exoneration to Juozas Ambrazevičius-Brazaitis: Publication, Operative Use, Repeated Notice, Criminal-Law Intimidation, Ministerial Concession, and Continued Publication

Submitted by Grant Arthur Gochin | 19 August 2026

Supplemental to the petition of 28 May 2026 concerning the member-country status of the Republic of Lithuania

Submitted to: Marcelo Mindlin, Chair of the Argentine Presidency of the IHRA for 2026; Ambassador Fabiana Loguzzo, Co-Chair; Michaela Küchler, Secretary General; and the IHRA Permanent Office.

Requested circulation and referral: the Academic Working Group; the Committee on Antisemitism and Holocaust Denial; the Committee on the Holocaust, Genocide, and Crimes Against Humanity; and the Heads of Delegation, with particular notice to the delegations of the United States and of the Republic of Lithuania, the disputed authority being attributed to institutions of the United States.¹

Core allegation: Even if the first 2018 formulation is assumed to have begun as error, the record after repeated documentary notice supports an inference of deliberate institutional deception: the Centre continued to publish and reuse a false attribution of American exoneration and coupled its defense of that attribution with a criminal-law warning directed at the research challenging it.

¹IHRA structure and leadership: <https://holocaustremembrance.com/who-we-are/our-structure>. Argentina assumed the Presidency of the Alliance on 18 March 2026 with Marcelo Mindlin as Chair and Ambassador Fabiana Loguzzo as Co-Chair; Michaela Küchler is Secretary General. The names of the Heads of Delegation of the United States and of the Republic of Lithuania as recorded on the Alliance's country pages should be confirmed at the date of transmission.

Distribution and Notice

The recipients below are copied to create a contemporaneous notice record. Institutional observers are copied for notice and preservation; they are not asked to adjudicate the petition. This submission has also been published in full, on the date of filing, for public record and transparency, at <https://grantgochin.substack.com/p/supplemental-submission-to-the-international>. Publication is disclosed so that no recipient is placed on notice of a document already in the public domain without knowing it, and so that the state of the record on the filing date is independently verifiable.

Filed with: Marcelo Mindlin, Chair, 2026 Argentine Presidency of the IHRA; Ambassador Fabiana Loguzzo, Co-Chair; Michaela Küchler, Secretary General (SG@holocaustremembrance.com); IHRA Permanent Office (info@holocaustremembrance.com); Argentine Ministry of Foreign Affairs IHRA routes previously used (mnc@cancilleria.gob.ar; privada_clang@mrecic.gov.ar).

IHRA expert and delegation notice: Carson Phillips, Chair, Academic Working Group (cphillips@gratz.edu); Michael Newman, Chair, Committee on Antisemitism and Holocaust Denial (via IHRA Permanent Office); Jennifer Ciardelli, Chair, Committee on the Holocaust, Genocide and Crimes Against Humanity and U.S. delegation member (via IHRA Permanent Office / USHMM); U.S. Department of State Holocaust-issues distribution (EUR-SEHI-DL@state.gov); Arezoo Hersel-Rohila, Israel Co-Head of Delegation (Arezoo.Hersel-rohila@mfa.gov.il); Iris Rosenberg, Israel Co-Head of Delegation (iris.rosenberg@yadvashem.org.il); Arvydas Daunoravičius, Lithuania Head of Delegation (via urm@urm.lt); Stanislovas Stasiulis, Lithuania Academic Working Group (stanislovas.stasiulis@istorija.lt); Ronaldas Racinkas (ronaldas.racinkas@lr.lt); Ingrida Vilkiene (ingrida.vilkiene@lr.lt); Faina Kukliansky (fainakukliansky@gmail.com).

Republic of Lithuania — diplomatic and state notice: Minister of Foreign Affairs Kęstutis Budrys (minister@urm.lt); Vice-Minister Vidmantas Verbickas (vidmantas.verbickas@urm.lt); Ambassador Gediminas Varvuolis, Embassy of Lithuania in Washington (amb.us@urm.lt); Ministry of Foreign Affairs (urm@urm.lt); International Commission for the Evaluation of the Crimes of the Nazi and Soviet Occupation Regimes in Lithuania (komisija@lr.lt); Office of the Seimas Ombudsman (ombuds@lrski.lt).

LGGRTC notice: Council of the Genocide and Resistance Research Centre (taryba@genocid.lt); Dr. Arūnas Bubnys (arunas.bubnys@genocid.lt); Centre general address (centras@genocid.lt); Evaldas Gelumauskas (evaldas.gelumauskas@genocid.lt); Kristina Burinskaitė (kristina.burinskaite@genocid.lt).

Lithuanian historical-research notice: Lithuanian Institute of History — Director Aurimas Švedas (aurimas.svedas@istorija.lt); Head of Twentieth-Century History Vitalija Stravinskienė (vitalija.stravinskiene@istorija.lt); Stanislovas Stasiulis (stanislovas.stasiulis@istorija.lt); Institute general address (istorija@istorija.lt).

Institutional observers: Yad Vashem — Iris Rosenberg and Yossi Gevir (yossi.gevir@yadvashem.org.il); United States Holocaust Memorial Museum — Jennifer Ciardelli (through IHRA/USHMM), Dr. Anna Ullrich (aullrich@ushmm.org), and Kyra Schuster (kschuster@ushmm.org); Victims of Communism Memorial Foundation / Victims of Communism Museum — President and CEO Dr. Eric Patterson, via info@victimsofcommunism.org.

Congressional notice: The Honorable Brad Sherman, United States House of Representatives, through Scott Abrams (Scott.Abrams@mail.house.gov) and Elia Groode (Elia.GroodeCA@mail.house.gov).

I. Nature of this submission

1. This is a supplemental evidence submission concerning the conduct of a member country. It supplements the petition of 28 May 2026 and its supplement of 3 June 2026, and is filed on the same footing.²
2. The question presented is not whether Juozas Ambrazevičius-Brazaitis was criminally culpable. It is whether the rehabilitation practice of a Member Country falls within the conduct the Alliance's own instruments address.
3. The practice complained of has five documented stages. A rehabilitation that no competent authority of the United States ever issued was attributed to the United States by a Lithuanian state institution. That attributed rehabilitation was then reused as favorable authority in a further published historical determination concerning a second individual, without disclosure. It was defended in official correspondence, in a public statement, and in a filing before a Lithuanian court after specific written notice from a member of the United States Congress and from four members of the United States bar. It was partially disavowed by the Ministry of Foreign Affairs of the Republic of Lithuania in a written communication to that member of Congress on 12 May 2026, which described the formulation as legally imprecise, expressed regret, and stated that it had been corrected. And it remains published today, uncorrected, in Lithuanian and in English.
4. Each of those five stages is established by an instrument of the Lithuanian State, of a Lithuanian oversight body, of a Lithuanian court, or of the United States Government. None depends on the submitting party's characterization, and none requires a finding about the conduct of any individual in 1941.
5. The Alliance is asked to consider this conduct under the Working Definition of Holocaust Denial and Distortion, the Statement on Rehabilitation of 2020, and the 2020 Ministerial Declaration. The submission does not allege criminal fraud, does not ask the Alliance to adjudicate criminal liability, and does not ask it to decide a commemorative question.
6. The evidentiary architecture is deliberately narrow. The central chain requires no archival collation, no attribution of intent to any named official, and no determination concerning the wartime conduct of any individual. It requires only four documented facts: a legal proposition that no American document supports, published by a state institution; specific and repeated correction from a member of the United States Congress; a written concession by the Ministry of Foreign Affairs of the Republic of Lithuania that the formulation was legally imprecise, coupled with an assertion that it had been corrected; and the continued publication of the claim after that concession.

II. What is not claimed

²Petition to the International Holocaust Remembrance Alliance concerning the member-country status of the Republic of Lithuania, 28 May 2026, thirty-two pages: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/IHRA-Petition-Gochin-5-28-26.pdf>. Supplement of 3 June 2026. Procedural letter to Secretary General Michaela Küchler, 23 July 2026.

7. This section is placed before the evidence rather than after it, because the boundaries of the submission are part of its substance.

Criminal guilt is not claimed. The submission takes no position on whether Brazaitis was criminally culpable for anything. No court in any country has ever convicted him, and none is asked to now.

Personal intent of named officials is not claimed. This submission does, however, allege deliberate institutional maintenance and reuse of the false American-exoneration claim after repeated documentary notice. That inference concerns institutional conduct over time and does not require assigning a private state of mind to any named official.

Ministerial dishonesty is not claimed. The letter of 12 May 2026 attributes its information expressly to the Genocide and Resistance Research Centre. The submission does not assert that the Vice-Minister knew the assertion of correction was inaccurate.

Criminal fraud is not alleged. The Alliance has no criminal jurisdiction and none is invoked. The word deliberate is used in this submission in the sense carried by the Working Definition of Holocaust Denial and Distortion, which addresses intentional efforts to excuse or minimize principal elements of the Holocaust including the role of collaborators and allies of Nazi Germany. The allegation is that an institution, after specific notice, intentionally maintained and reused an attribution it could not support. It is not an allegation of fraud, and no criminal characterization is sought.

Concession beyond its terms is not claimed. The Ministry conceded a point of United States law and a wording. It did not concede collaboration, falsification, culpability, or any historical conclusion, and it expressly preserved the underlying assessment.

Sole formal ground is not claimed. The submission does not assert that Commissioner Chapman identified the subject's death as the formal ground of deactivation. His letter recites the review committee's assessment of the evidence. Both facts are carried together throughout.

The two files are not merged. This submission concerns Brazaitis. Material concerning Kazys Škirpa appears only where a Lithuanian state institution itself connected the two, and no finding from the separate Škirpa transmission study is imported.

III. Applicable instruments

8. The Working Definition of Holocaust Denial and Distortion, adopted 10 October 2013, addresses intentional efforts to excuse or minimize the impact of the Holocaust or its principal elements, including the role of collaborators and allies of Nazi Germany, and attempts to blur responsibility.³
9. The Statement on Rehabilitation of 2020 addresses efforts to rehabilitate persons complicit in crimes of the Holocaust, and calls upon Member Countries to engage accurately with

³IHRA Working Definition of Holocaust Denial and Distortion, adopted 10 October 2013:
<https://holocaustremembrance.com/resources/working-definition-holocaust-denial-distortion>.

national histories and to accept political responsibility for doing so.⁴ This is the instrument that most directly fits the conduct described below. A state institution asserting a foreign judicial or executive rehabilitation that was never issued, in support of a favorable public assessment of the head of the government that promulgated the anti-Jewish measures of 1941, is the conduct that statement addresses.

10. The 2020 Ministerial Declaration commits Member Countries to counter distortion, to encourage research, to preserve and make available archival material, and to deal openly and accurately with the historical record.⁵ The production requests at Part XX are framed by reference to that commitment.

IV. The Alliance has addressed this institution before

11. This is not the first occasion on which the conduct of the Genocide and Resistance Research Centre of Lithuania has been placed before the Alliance, and the earlier occasion is directly instructive.
12. In 2019 the chairs and recent chairs of the Alliance's expert working groups and committees issued a statement expressing grave concern at the Centre's decision to justify the wartime actions of Jonas Noreika in relation to the Jews of Lithuania. The signature block opened with Ambassador Georges Santer, then Chair of the Alliance, Professor Yehuda Bauer, its Honorary Chair, and Dr. Wichert ten Have. The statement identified the Centre's text of 27 March 2019 as the most recent of a series of attempts to rehabilitate Noreika's reputation, recorded that documentary sources indicate his key role in the ghettoization and expropriation of the property of Jews in the Šiauliai district in 1941, criticized the Centre for suggesting he was an active rescuer while unable to evidence his direct role in any rescue, applied the Working Definition of Holocaust Denial and Distortion to that conduct, and urged the Government of Lithuania and the Centre to acknowledge and condemn Noreika's activities during the German occupation.⁶
13. Three features of that statement bear on the present submission. The Alliance's own experts identified the mechanism rather than merely disagreeing with a conclusion: association converted into proof, and later anti-Soviet activity deployed as a shield against a Holocaust-era record. They addressed the same institution. And they asked for an act of acknowledgment and correction. No act satisfying that request has been identified in the record before this submission.

⁴IHRA Statement on Rehabilitation, 2020: <https://holocaustremembrance.com/statements/ihra-statement-on-rehabilitation>.

⁵2020 IHRA Ministerial Declaration: <https://holocaustremembrance.com/resources/2020-ihra-ministerial-declaration>.

⁶International Holocaust Remembrance Alliance, Statement on the Center for the Study of the Genocide and Resistance of Lithuania, 2019: <https://holocaustremembrance.com/statements/statement-center-study-genocide-resistance-lithuania>. Preservation copy: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Statement-on-Center-for-the-Study-of-the-Genocide-and-Resistance-of-Lithuania-IHRA.pdf>. The statement is cited as institutional precedent concerning the same institution and not as a determination in the present matter.

14. The present submission describes the same institution performing a related operation with a different instrument. Where the Noreika materials converted association into evidence of rescue, the Brazaitis materials convert an administrative deactivation by a foreign agency into a foreign judicial or executive rehabilitation. The Alliance is asked to consider whether its 2019 concern has been answered or repeated.

V. The American record

15. In 1974 the Immigration and Naturalization Service of the United States examined an allegation that Brazaitis, as Minister of Education and acting head of the Provisional Government, and Jonas Šlepetys, as Minister of the Interior, were responsible for the issuance and enforcement of repressive measures against the Jewish minority.
16. Commissioner Leonard F. Chapman, Jr. reported the outcome to Subcommittee Chairman Joshua Eilberg in December 1974 under file CO 703.951. The report states that no information of an evidentiary nature was elicited from any of the sources contacted; that the review committee's opinion was that the investigation had produced no substantive evidence and that further investigation appeared unwarranted; that the names were removed from the active list and the investigations deactivated; and that it is standard practice in cases of this type to continue to query new sources and to reactivate the investigation should meaningful information be elicited.⁷
17. Three characteristics of that document are decisive and are apparent on its face. It is administrative, not adjudicative. It deactivates rather than concludes. It preserves the matter for reactivation.
18. The positions of the two men differed materially. Šlepetys appeared voluntarily and testified under oath. Brazaitis was never questioned. The Service recorded that when it attempted to obtain his testimony it was ascertained that he had recently sustained his fourth heart attack and was hospitalized, his physician advising that the prognosis was unfavorable and that no time frame could be projected. He died on 24 October 1974, before the Service reported.
19. An immigration proceeding exists to remove a person from the United States. Brazaitis died before the Service could question him, and his death eliminated any remaining immigration remedy and any practical purpose for an immigration proceeding. The inquiry was deactivated without adjudication and without any finding of innocence. The submission does not assert that death was named as the formal ground; Chapman's letter separately recites the review committee's assessment of the evidence available at that time. Both facts stand together, and neither produces an exoneration.

The sources not consulted

20. The Service's own memorandum of September 1974 lists the sources contacted, numbering approximately seventy. They comprise American Jewish communal organizations, survivor

⁷Immigration and Naturalization Service Commissioner Leonard F. Chapman, Jr. to Chairman Joshua Eilberg, December 1974, file CO 703.951. Transmitted by the Ministry of Foreign Affairs of the Republic of Lithuania to Representative Brad Sherman in the package of 13 May 2026: <https://static-cdn.toi-media.com/blogs/uploads/2026/06/Letter-to-Rep.-Sherman.pdf>.

associations, Yad Vashem, the Wiener Library, the Simon Wiesenthal centre in Vienna, and the German document centers at Ludwigsburg, Berlin and Wiesbaden.⁸

21. No Lithuanian archive appears on that list. In 1974 the archives of the Lithuanian Soviet Socialist Republic were not available to a United States immigration agency. The Service's own source record provides no indication that the Provisional Government's archival records were before it. Those records include the Provisional Government's own decrees, among them the Regulations on the Status of Jews signed on 1 August 1941 and held at the Lithuanian Central State Archive under f. 1075, ap. 2, b. 5, l. 154A.⁹ The minutes and decrees of the Provisional Government were subsequently published in Lithuania in 2001.¹⁰
22. The evidentiary limit of this point is stated expressly. The absence of Lithuanian archives from the source list establishes that no listed Lithuanian archive was contacted. It does not establish everything the investigators may otherwise have known. The point is nevertheless material, because the Centre characterizes the 1974 inquiry as extensive and internationally coordinated, and derives authority from that characterization, while relying on a document that shows the inquiry did not reach the archives holding the relevant papers.

The semantic chain

23. Three formulations must be distinguished, because the distance between them is the substance of this submission.
24. First. Chapman, December 1974: no information of an evidentiary nature was elicited from the sources contacted; deactivated subject to reactivation.¹¹
25. Second. Eilberg to Stanley A. Gecys of the Lithuanian-American Community of the USA, Inc., 13 January 1975: these actions are based upon the determination that there is no evidence of anti-Jewish or pro-Nazi activities on their part.¹² A congressional covering letter to a diaspora organization thereby converted an absence of elicited evidence into an absence of evidence. That is the first hardening, and it occurred in a document that is itself not adjudicative.
26. Third. The Genocide and Resistance Research Centre of Lithuania, from 2018: complete exoneration, and rehabilitation by the United States Department of Justice. No American document identified in this file contains that proposition. The United States Congress has no

⁸Immigration and Naturalization Service memorandum to file, September 1974, listing the sources contacted: American Jewish communal bodies, survivor associations, synagogues and community councils, Yad Vashem, the Wiener Library, the Simon Wiesenthal centre in Vienna, and the German document centers at Ludwigsburg, Berlin and Wiesbaden. Enclosed in the same package of 13 May 2026.

⁹Regulations on the Status of Jews, signed 1 August 1941, Lithuanian Central State Archive f. 1075, ap. 2, b. 5, l. 154A: <https://static-cdn.toi-media.com/blogs/uploads/2026/03/5.-Zydu-padeties-nuostatai-LCVA-f1075-a2-b5-154A.pdf>.

¹⁰Publication in Lithuania in 2001 of the Provisional Government minutes and decrees. The exact bibliographic citation is under verification and no numerical interval is asserted in this submission pending that verification.

¹¹Chapman to Eilberg, December 1974, file CO 703.951, cited above at note 7.

¹²Chairman Joshua Eilberg to Stanley A. Gecys, Lithuanian-American Community of the USA, Inc., 13 January 1975. Enclosed in the same package of 13 May 2026.

power to exonerate. An immigration service has no power to rehabilitate. No Department of Justice adjudication concerning Brazaitis has been identified in this record or produced despite repeated demands for it.

VI. Where the claim was asserted

27. The claim was asserted by the Centre in at least five instruments, of which two remain publicly available.
28. Letter No. 55R-21 of 26 February 2018, addressed to the applicant and to the Seimas Ombudsman, asserts complete exoneration.¹³
29. A page published on the Centre's website, [genocid.lt](https://www.genocid.lt) page 2969, under the title Dėl informacijos pateikimo, attributes the rehabilitation to the United States Department of Justice and states in the same publication that the research questioning the Centre's findings may implicate the Constitution and the Criminal Code of the Republic of Lithuania.¹⁴
30. The Centre's defence pleading of 1 October 2018 in Administrative Case No. eI-4215-281/2018 repeats the claim to a Lithuanian court. In both the Lithuanian original and the English translation the pleading identifies the recipient of the Eilberg letter as Algimantas Gečius. The recipient was Stanley A. Gecys. The Centre thereby misidentified the addressee of the single document on which its claim rests, in a signed filing before a court.¹⁵
31. Letter No. 14R-82 of 11 October 2018 asserts the claim again and states the underlying legal theory openly: a terminated accusation without proven culpability is equated with acquittal, the Eilberg correspondence is treated as confirmation of exoneration, and Eilberg's closing courtesy is characterized as an indirect apology.¹⁶
32. A further public statement on the Centre's website, [genocid.lt](https://www.genocid.lt) page 3058, attributes the rehabilitation to the United States Department of Justice in 1974 at the request of the United States Congress, states that following what it describes as an exhaustive investigation the two men were rehabilitated and removed from the list of suspects because no evidence of a crime was found in their activities, and displays the Eilberg letter beneath the text as documentary proof. It is published in Lithuanian and in English.¹⁷

¹³Genocide and Resistance Research Centre of Lithuania, Letter No. 55R-21, 26 February 2018: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Gonocide-Reply-2018-02-26-Holocaust-interpretation.pdf>.

¹⁴<https://www.genocid.lt/centras/lt/2969/a/>. The Centre's 2018 annual archive listing is at https://www.genocid.lt/centras/lt/3042/a/print_version/. Capture: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Regarding-the-provision-of-information.pdf>.

¹⁵Defence pleading of the Genocide and Resistance Research Centre, Administrative Case No. eI-4215-281/2018, 1 October 2018, bilingual: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/lt-govt-defense.pdf>. English translation at <https://static-cdn.toi-media.com/blogs/uploads/2026/05/2008-10-reply-to-plaintiff-complaint.pdf>; the "2008" element of that filename is an archival naming error.

¹⁶Genocide and Resistance Research Centre of Lithuania, Letter No. 14R-82, 11 October 2018: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/4.-2018-10-11-Lietuvos-gyventoju-genocido-ir-rezistencijos-tyrimo-centro-rastas-Nr.-14R-82.pdf>.

¹⁷<https://www.genocid.lt/centras/lt/3058/a/>. The Centre's 2019 annual archive listing is at

33. The Centre characterizes the American inquiry as exhaustive in Lithuanian and as thorough in its English version. Whatever adjective is used, the characterization omits two material limitations apparent from the record: the investigation was expressly subject to reactivation on new information, and no Lithuanian archive appears among the sources listed as contacted. The Centre's two language versions render the characterization differently, and the Lithuanian original is requested at Part XX.¹⁸
34. The two public pages are internally inconsistent. Both attribute the act to the United States Department of Justice. One dates it to 1975 and the other to 1974.
35. The 2019 statement also records the correct account in order to reject it. It states that the Centre's opponents maintain that the investigation was terminated on account of the subject's death, that he was therefore not rehabilitated, and that the Centre is deliberately lying. The objection was therefore before the Centre, in print, in its own publication.

Dating limitation. The Centre's annual archive listings place page 2969 in 2018 and page 3058 in 2019. The precise day of first publication of page 2969 is recorded inconsistently in the working record, and a separate Centre publication of 22 May 2026 may account for one of the recorded dates. The finding advanced here does not depend on the precise day of first publication. It depends on two facts only: that both pages were published well before 12 May 2026, and that both remained published on 12 August 2026.

VII. The claim in operation

36. The most significant item in this submission is not another instance of the claim. It is evidence that the claim performed institutional work.
37. In the record of the Seimas Ombudsman of 2 February 2018, Pažyma No. 4D-2017/1-1558/3D-317, the Centre acknowledged that in reaching a favorable conclusion concerning Kazys Škirpa it had relied on circumstances that were not stated in its published conclusion, and identified them. They were the asserted comprehensive United States investigation and complete exoneration of Brazaitis, and Škirpa's residence in the United States for approximately thirty years without accusation. The Ombudsman found a failure to observe the principle of transparency and recognized the complaint as well founded.¹⁹
38. The same acknowledgment appears in a second instrument, and that instrument is the Centre's own signed letter. Letter No. 55R-21 of 26 February 2018, at pages 4 to 5 of the

<https://www.genocid.lt/centras/lt/3149/a/>. English version published on the same site under the title "Genocide Research Center Will Not Give in to Vulgar Pressure."

¹⁸genocid.lt page 3058. The Lithuanian text characterizes the 1974 United States inquiry by a term rendered in the working translation as exhaustive; the English version published on the Centre's own site renders the same characterization as thorough. Both renderings are inconsistent with Commissioner Chapman's letter, which the Centre reproduces beneath the text.

¹⁹Seimas Ombudsman of the Republic of Lithuania, Pažyma No. 4D-2017/1-1558/3D-317, 2 February 2018, Augustinas Normantas, twenty pages: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/4D-2017-1-1558-3D-317-2018-02-02.pdf>.

English translation, records that in reaching the Škirpa finding the Centre took into account material not mentioned in the finding, and gives the same two examples.²⁰

Translation limitation. The two records of this acknowledgment are rendered differently in the working translations, one as extenuating circumstances and the other as circumstantial evidence not mentioned in the finding. These are probably two renderings of a single Lithuanian phrase. The Lithuanian original and a verified translation should be placed side by side before either formulation is quoted as the Centre's words, and the Alliance is asked to obtain the original text through Part XX below.

39. The significance of the acknowledgment does not depend on which rendering is correct. On either rendering, a supposed American exoneration that no American document supports was relied upon by a state historical institution as favorable material in reaching a published determination about a second individual, and was not disclosed in the published determination.
40. This converts the matter from inaccurate wording into operative use. It is also the only documented connection between the Brazaitis and Škirpa files, and this submission asserts no other.

VIII. Notice

41. The Centre and the Lithuanian State were placed on notice repeatedly, in writing, over eight years.
42. On 2 February 2018 the Seimas Ombudsman found that the Centre had failed to observe the principle of transparency.²¹
43. On 12 December 2018 a complaint to the Ombudsman challenged Letters Nos. 55R-21 and 14R-82 and attached four opinions from members of the United States bar. Stuart Leviton wrote that the letter recorded the state of the evidence in 1975 and could not support a conclusion that either man had done nothing wrong. Gary Labin wrote that exoneration has a settled meaning in American legal usage, that closing a file for insufficient evidence does not meet it, and that the claim was wholly misleading. Bryan Barnet Miller wrote that a congressional subcommittee is not a court and that the Service was not a judicial body. I. Mark Bledstein wrote that extrapolating any clearance from Brazaitis to another person had no legal validity.²² The Ombudsman declined to act.

²⁰Genocide and Resistance Research Centre Letter No. 55R-21, 26 February 2018, at pages 4 to 5 of the English translation, cited above at note 13.

²¹Seimas Ombudsman Pažyma No. 4D-2017/1-1558/3D-317, 2 February 2018, cited above at note 19.

²²Complaint to the Seimas Ombudsman, 12 December 2018, challenging Letters Nos. 55R-21 and 14R-82 and attaching four opinions of members of the United States bar: https://static-cdn.toi-media.com/blogs/uploads/2026/04/20181212_Letter_Brazaitis_Ombudsman_GC.pdf. Individual opinions: Leviton, <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Leviton.pdf>; Labin, <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Labin.pdf>; Miller, <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Miller.pdf>; Bledstein, <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Bledstein-letter.pdf>.

44. On 15 November 2019 a complaint was lodged with the Prosecutor General under Article 170-2 § 1. The refusal of 2 December 2019 described the foundation of the Centre's claim in the prosecutor's own words as a 1975 letter from a United States Congressman to the American Lithuanian community. The refusal turned on intent rather than on the accuracy of the claim.²³
45. Congressional correspondence spans fourteen years. On 25 September 2012 Representatives Brad Sherman, Henry Waxman and Howard Berman wrote to Prime Minister Andrius Kubilius protesting the reburial of Brazaitis with state honors.²⁴ On 25 September 2019 Representative Sherman wrote to Prime Minister Saulius Skvernelis, routing the letter through Ambassador Rolandas Kriščiūnas in Washington, addressing the exoneration claim directly. On 25 May 2021 he wrote to Ambassador Audra Plepytė. Neither letter was answered.²⁵
46. On 20 March 2026 Representative Sherman wrote to Ambassador Gediminas Varvuolis. He recited the two unanswered letters, stated that administrative closure does not constitute exoneration under United States legal standards, and stated that no United States court, prosecutor or administrative body has issued a determination clearing Brazaitis of responsibility for actions undertaken during his tenure in the Provisional Government of 1941. He requested the basis of the claim or its correction, and asked whether the characterization of congressional correspondence as the opinion of a politician reflects the position of the Government of Lithuania.²⁶

IX. The asymmetric treatment of congressional authority

47. Lithuania did answer the correction of 2019, though not to its author. The Centre replied on 22 December 2020, under reference No. 14R-2020-11-26, that the letter to the Prime Minister was to be seen as the opinion of a politician and not as a new historical source or a new circumstance of historical events. That reply was addressed to the Ministry of Foreign Affairs. Representative Sherman quoted it back to Ambassador Plepytė in 2021 and asked whether it reflected the position of the Government of Lithuania. He received no answer,

²³Complaint to the Prosecutor General under Article 170-2 § 1, 15 November 2019, received 18 November under registration No. AP-31212: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/complaint-to-public-prosecutor-english.pdf>. Refusal of 2 December 2019, Investigation Material No. M-2-02-01142-19, Prosecutor Benediktas Leišys: https://static-cdn.toi-media.com/blogs/uploads/2026/04/2020-05-20_035122-Decision.pdf. The filename is a later archival label; the decision date printed in the document is 2 December 2019.

²⁴Representatives Brad Sherman, Henry Waxman and Howard Berman to Prime Minister Andrius Kubilius, 25 September 2012: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/2012-Congress-letter-on-Brazaitis.pdf>.

²⁵Representative Brad Sherman to Prime Minister Saulius Skvernelis, 25 September 2019; the address block reads "Hon. Saulius Skvernelis, Prime Minister of the Republic of Lithuania, In Care of: Hon. Rolandas Kriščiūnas, Ambassador of the Republic of Lithuania." Representative Sherman to Ambassador Audra Plepytė, 25 May 2021. Compilation: <https://static-cdn.toi-media.com/blogs/uploads/2026/03/Congress-on-Brazaitis.pdf>. There was no separate Sherman letter in 2020.

²⁶Representative Brad Sherman to Ambassador Gediminas Varvuolis, 20 March 2026: <https://static-cdn.toi-media.com/blogs/uploads/2026/08/Amb.-Varvuolis-Letter-2026.pdf>.

and the same question put again on 20 March 2026 was not answered in the reply of 12 May 2026.²⁷

48. The asymmetry is the point, and it is visible without any inquiry into motive. A letter from a chairman of a congressional subcommittee was treated as authoritative, and its language hardened into a verdict of exoneration, when it could be read favorably. A letter from a member of the same Congress correcting that attribution was characterized as the opinion of a politician. The Alliance is not asked to decide whether Congress is a competent historical authority. It is asked to consider whether a Member Country may invoke the authority of a foreign legislature as the source of an exonerating verdict and then deny that authority any relevance when the same legislature corrects the attribution.

X. The ministerial concession and what followed

49. On 12 May 2026 Vice-Minister Vidmantas Verbickas replied to Representative Sherman under Ref. (19.2.3)3-2806, transmitted the following day under cover from Ambassador Varvuolis together with six pages of American documents.²⁸
50. The reply concedes three things. That the Centre has acknowledged that its 2018 formulation referring to complete exoneration was legally imprecise. That regret has been expressed for the miswording. And that administrative discontinuation of an investigation is not equivalent to formal judicial exoneration under United States law.
51. The reply also asserts a fourth thing, and this is the operative statement for present purposes: that the formulation has since been corrected to reflect more accurately the nature of the findings. The Vice-Minister states expressly that his clarification is based on information provided by the Centre, the institution responsible for historical research in this area.
52. On 12 August 2026, three months after that letter, both public pages remained live and continued to carry the claim, in Lithuanian and in English, and the captures bear the Centre's own site-rendered date of that day. Captures taken on 6 August 2026 are also held. The pages were re-examined on 19 August 2026 and remained unchanged in substance. The current status of every instrument is set out at Part XI below.
53. The documents the Ministry attached in support of its position do not contain the proposition asserted. The Ministry transmitted the Chapman letter to Congress. The Chapman letter states that the investigation was deactivated subject to reactivation. The Centre's 2019 page displays the Eilberg letter beneath its own rehabilitation claim, and the Eilberg letter does not contain the word rehabilitated.

²⁷Genocide and Resistance Research Centre reply of 22 December 2020, reference No. 14R-2020-11-26, addressed to the Ministry of Foreign Affairs, quoted in Representative Sherman's letter to Ambassador Plepytė of 25 May 2021. A complete verified copy of the 22 December 2020 reply has been requested and is not yet held; the wording relied on here is as quoted in the congressional letter.

²⁸Vice-Minister Vidmantas Verbickas to Representative Brad Sherman, 12 May 2026, Ref. (19.2.3)3-2806, transmitted under cover from Ambassador Varvuolis dated 13 May 2026 with six pages of American documents: <https://static-cdn.toi-media.com/blogs/uploads/2026/06/Letter-to-Rep.-Sherman.pdf>.

54. The Alliance is asked to note the structure of this rather than any characterization of it. A member country's foreign ministry represented to the legislature of an allied state that a correction had been made. The public pages of the institution that made the claim did not reflect a correction three months later. The submission does not assert that the Ministry knew the representation to be inaccurate. It asserts that the representation was made, that it has not been borne out by the public record, and that no corrective act has been identified.

XI. Current status of the record as at 19 August 2026

55. The public record was re-examined on 19 August 2026, the date of this submission. The status of each instrument is stated below so that the Alliance is not asked to rely on captures alone, and so that any subsequent alteration of the public pages can be measured against a dated statement made before the Alliance was seised of the matter.
56. genocid.lt page 3058 remains published and continues to carry the assertion that Brazaitis was rehabilitated by the United States Department of Justice in 1974 at the request of the United States Congress, following what the page describes as an exhaustive investigation. The page continues to recite the objection that the investigation was terminated on account of the subject's death, and continues to reject it. It remains available in Lithuanian and in English.
57. genocid.lt page 2969 remains published and indexed and continues to carry the attribution of the rehabilitation to the United States Department of Justice.
58. Letter No. 55R-21 of 26 February 2018 has not been withdrawn, corrected, or reissued. Letter No. 14R-82 of 11 October 2018 has not been withdrawn, corrected, or reissued.
59. No corrective act of any kind has been identified. Notwithstanding the Ministry's statement of 12 May 2026 that the formulation had been corrected, no corrected text, no date of correction, no authorizing official and no public location of any correction has been produced or located.
60. The administrative demand of 17 July 2026 for the withdrawal, correction and reissue of both letters remains wholly unanswered.
61. Ninety-nine days have therefore elapsed between the Ministry's written representation to a member of the United States Congress that the formulation had been corrected and the date of this submission, with the claim still published. Captures of both pages in both language versions are held from 6 August 2026 and 12 August 2026, each bearing the Centre's own site-rendered date, and the live pages were re-examined on 19 August 2026.²⁹

²⁹ Captures of genocid.lt page 3058, Lithuanian and English versions, taken 12 August 2026 Vilnius time, each bearing the Centre's own site-rendered date of that day. Lithuanian: https://static-cdn.toi-media.com/blogs/uploads/2026/08/FireShot-Capture-136-Genocido-tyrimo-centras-nepasiduos-vulgariam-spaudimui-Genocid.lt_-www.genocid.lt_.png. English: https://static-cdn.toi-media.com/blogs/uploads/2026/08/FireShot-Capture-018-Genocide-Research-Center-will-not-succumb-to-vulgar-pressure-Geno_-www.genocid.lt_.png. Earlier captures of both pages were taken on 6 August 2026 and are held with their capture dates.

XII. The claim was published together with a warning to the researcher

62. genocid.lt page 2969 did more than assert an American rehabilitation. In the same publication the Centre stated that the research challenging its findings may implicate the Constitution and the Criminal Code of the Republic of Lithuania.
63. The Alliance is not asked to determine whether that statement was lawful under Lithuanian law, and no such determination is sought. The relevance is institutional. A state memory institution answered a documentary challenge by maintaining an unsupported foreign legal verdict and, in the same public response, characterizing the challenging research in terms drawn from the criminal law. The 2020 Ministerial Declaration commits Member Countries to encourage research and to deal openly and accurately with the historical record, and the Alliance is asked to consider the effect of that pairing on open historical inquiry.
64. The placement and audience of the criminal-law language matter. It was not a general statement of Lithuanian law. It appeared in the Centre's public defense of the supposed American rehabilitation and was directed at the research challenging that rehabilitation. In ordinary terms, it warned the researcher that continuing the documentary challenge could expose him to constitutional or criminal consequences. The submission asks the Alliance to treat that as an attempted intimidation of historical inquiry. It does not ask the Alliance to determine whether the warning was independently unlawful or prosecutable.
65. The context is not hypothetical. A Lithuanian Jew, Artur Fridman, faces criminal proceedings in Lithuania under Article 170-2 § 1 concerning statements about the Holocaust-era record, with a hearing listed for 26 August 2026.³⁰ That prosecution is not the subject of this submission and no finding is sought about it. It is noted only because the Centre's public reference to the Constitution and the Criminal Code was made in the same publication as the rehabilitation claim, and the Alliance should know the legal environment in which historical dispute in that Member Country now takes place.

XIII. Why the record supports an inference of deliberate institutional deception

66. The Alliance need not decide why the first formulation was written in 2018. An initial error can occur without deception. The question is what the institution did after the error was identified in precise legal and documentary terms.
67. By December 2018 four members of the United States bar had explained why administrative discontinuation was not exoneration. By March 2019 the Centre's own public statement accurately recited the objection that the inquiry ended after Brazaitis died and that he therefore had not been rehabilitated, and then rejected that objection while retaining the rehabilitation claim. By December 2020 the Centre had characterized Representative Sherman's correction as the opinion of a politician. In May 2026 the Foreign Ministry conceded that the complete-exoneration formulation was legally imprecise. Ninety-nine days

³⁰Criminal Case No. 02-2-00512-24, Vilnius City District Court, charged under Article 170-2 § 1 and Article 313 § 2 of the Criminal Code of the Republic of Lithuania; hearing listed for 26 August 2026. Cited for context only; no finding concerning that prosecution is sought.

later the claim was still published, while the formal correction demand of 17 July remained unanswered.

68. From March 2019 at the latest, continued publication cannot credibly be explained by lack of notice or by an innocent misunderstanding of the objection. The Centre had the objection before it, stated it in its own publication, rejected it, and continued to publish the stronger American-rehabilitation proposition.
69. The conduct was not passive persistence. The claim was repeated in official letters, placed before a Lithuanian court, displayed in public pages in Lithuanian and English, and used without disclosure as favorable material in a second historical determination. The same institution therefore defended, exported, and operationalized the disputed American verdict after notice.
70. The criminal-law warning published beside the challenged exoneration adds a deterrent dimension to that chronology. The state institution simultaneously defended the unsupported verdict and warned that the research exposing the problem might engage the Constitution and Criminal Code. The ordinary institutional effect was to raise the prospect of criminal consequences for continuing the challenge.
71. On that record, this submission asks the Alliance to find, or at minimum to investigate, an inference of deliberate institutional deception in a limited and documentable sense: even if the first formulation began as error, after specific notice the Centre deliberately maintained and reused an American rehabilitation for which it has produced no American adjudication. This is an allegation about institutional conduct and correction practice, not an accusation that any named official personally lied. The conduct is capable of satisfying the Working Definition's 'intentional efforts' element when assessed from the repeated institutional acts documented after notice; no finding about any individual official's private state of mind is required for the institutional question presented here. The Alliance's own expert chairs asked in 2019 that the Government of Lithuania and the Centre acknowledge and condemn the wartime activities of a figure this same institution had sought to rehabilitate; seven years later no such act has been identified, and the correction practice at issue here is the same practice.
72. Lithuania can rebut that inference with documents rather than assurances: the American adjudication, the correction the Ministry said existed, the communication by which the Centre reported that correction, the internal drafting and approval record, and the records explaining the decision to retain the public pages and not answer the 17 July correction demand. Non-production is not treated as proof of intent, but it leaves the documentary inference unrebutted.

XIV. The absence of a corrective mechanism

73. Lithuania may respond that this is an administrative failure capable of internal remedy. The record indicates otherwise, and the point is structural rather than rhetorical.
74. A ministerial letter to a foreign legislator is not an administrative act and cannot correct an instrument issued by a separate legal person. The Centre is a separate legal person, and when its outputs were challenged its own pleading argued, and the Vilnius District Administrative

Court accepted, that those outputs are essentially informational, create no rights or duties, contain no appeal procedure, and fall outside the court's jurisdiction.³¹³²

75. The consequence is that a statement about the acts of a foreign state, published by a Lithuanian state institution and conceded by the Lithuanian foreign ministry to be legally imprecise, has no identified mechanism of correction within Lithuania. Letters Nos. 55R-21 and 14R-82 have not been withdrawn or reissued. A formal administrative demand for their withdrawal, correction and reissue, and for action on the public pages, was made on 17 July 2026. As at the date of this submission no response of any kind has been received: not a refusal, not an acknowledgment of receipt, and not a request for further time.³³
76. This is the reason the matter is placed before the Alliance. The broader accountability record contains fifty counted formal actions since 2015, with the present petition counted separately as the fifty-first in aggregate. Within the Brazaitis matter specifically, correction has been pursued through the Centre, the Ombudsman, the prosecutor, the courts, the Foreign Ministry, and congressional correspondence, without an identified mechanism capable of correcting the challenged state publications. An application to the European Court of Human Rights was declared inadmissible and is closed.³⁴

XV. Materiality: why the claim matters

77. The Alliance is not asked to determine the wartime conduct of the Provisional Government. It is asked to note why an assertion of American exoneration concerning its head is a matter within the Alliance's instruments rather than a domestic historiographical dispute.
78. The Provisional Government sat from late June to early August 1941. Its own records include the decision of 5 July 1941 approving requested funding for 824 members of the TDA Battalion and for the Kaunas Seventh Fort detention site; the Regulations on the Status of Jews signed by Ambrazevičius on 1 August 1941;³⁵ and the resolution of 2 August 1941 concerning restoration of bank-held valuables which excluded Jews.
79. Lithuania's own International Commission concluded in 2005 that the Provisional Government approved the segregation of Jews and the expropriation of Jewish property, did not publicly dissociate itself from the murder of Lithuanian Jews, and that the TDA

³¹Vilnius District Administrative Court, Case No. eI2-2846-535/2020, ruling of 17 March 2020, holding the Centre's finding essentially informational, creating no rights or duties, containing no appeal procedure, and declining jurisdiction: https://static-cdn.toi-media.com/blogs/uploads/2026/04/2020-03-17nutartis-bylojeeI2-2846-535-2020_gv.pdf. The argument originates in the Centre's own pleading of 1 October 2018 at paragraphs 48 to 53.

³²Centre defence pleading of 1 October 2018, paragraphs 48 to 53, cited above at note 15.

³³Re-application of 17 July 2026 for the office of Director General of the Genocide and Resistance Research Centre, containing a formal administrative request for withdrawal, correction and reissue of Letters Nos. 55R-21 and 14R-82 and for action on the Centre's public pages: <https://grantgochin.substack.com/p/re-application-director-general-lggrtc>. Action S-50 in the accountability inventory.

³⁴Lithuania Accountability and Litigation Inventory, edition of 5 August 2026. Fifty counted formal actions, S-01 to S-50; the IHRA petition of 28 May 2026 is counted separately; aggregate fifty-one. European Court of Human Rights Application No. 10930/21 was declared inadmissible and is closed.

³⁵Regulations on the Status of Jews, 1 August 1941, LCVA f. 1075, ap. 2, b. 5, l. 154A, cited above at note 9.

Battalion was a responsible agency in the killings, treating the anti-Jewish regulations as a major expression of official antisemitism.³⁶

- 80. Lithuania awarded Brazaitis the Order of the Cross of Vytis posthumously and in 2012 supported the repatriation of his remains and a ceremonial reburial in Kaunas. More than forty Lithuanian scholars and public figures signed an open letter objecting at the time.
- 81. The claim of American exoneration is therefore not incidental. It is a significant external authority invoked in support of the favorable public standing of the head of the government that promulgated those measures. That is the conduct addressed by the Statement on Rehabilitation.

XVI. Findings by confidence level

Established on documents held

- 82. No American document identified in this file contains an exoneration, acquittal, rehabilitation, or adjudication of innocence concerning Brazaitis.
- 83. The 1974 inquiry was deactivated, expressly subject to reactivation, without adjudication; the subject was never questioned and died before the Service reported.
- 84. From 2018 the Centre asserted complete exoneration and rehabilitation by the United States Department of Justice in official letters, in a court pleading, and in public publications, two of which remain live.
- 85. The two live pages are internally inconsistent as to the year, and one of them states and rejects the correct account.
- 86. The Ministry of Foreign Affairs conceded on 12 May 2026 that the complete-exoneration formulation was legally imprecise and that administrative discontinuation is not formal judicial exoneration, and asserted that the formulation had been corrected.
- 87. On 12 August 2026 both pages remained published with the claim, in Lithuanian and in English.
- 88. Notice was given repeatedly from 2018 onward, including by four opinions of members of the United States bar, a prosecutorial complaint, and congressional correspondence in 2019, 2021 and 2026.
- 89. The Centre's March 2019 publication demonstrates on its face that the death-and-non-rehabilitation objection was before the institution and was expressly rejected while the rehabilitation claim was retained. Whatever uncertainty may attach to the original 2018 drafting, absence of notice is not an available explanation after that publication.

³⁶International Commission for the Evaluation of the Crimes of the Nazi and Soviet Occupation Regimes in Lithuania, conclusions of 2005 concerning the Provisional Government, the TDA Battalion, and the anti-Jewish regulations.

90. The Centre's public defense of the rehabilitation claim was paired with a warning that the research challenging its findings might implicate the Constitution and Criminal Code. The warning and the challenged historical proposition were published together.

Supported institutional inference

91. Even if the original 2018 formulation is treated as error, the continued publication, formal defense, cross-file reuse, rejection of specific American correction, and post-concession non-correction support an inference of deliberate institutional deception and criminal-law intimidation capable of deterring the research exposing it. The inference is institutional; individual dishonesty is not required and is not claimed.

Provisional and excluded from the principal finding

92. The acknowledgment of undisclosed reliance is recorded in two instruments but is rendered differently in the working translations. The finding of operative use is advanced on the basis that either rendering supports it, and the precise wording is reserved pending the Lithuanian original.
93. The precise first-publication date of genocid.lt page 2969 is recorded inconsistently and is reserved. No finding here depends on it.
94. The interval between the 2001 Lithuanian publication of the Provisional Government records and the Centre's 2018 assertion is not stated numerically pending verification of the bibliographic record.

Unresolved

95. Whether any corrective act was in fact made by the Centre before or after 12 May 2026, and if so its text, date, author and location.
96. What the Centre communicated to the Ministry to support the statement that the formulation had been corrected.
97. Whether any document of the United States Department of Justice was ever relied upon, and if so which.

Not claimed

98. Criminal guilt; personal authorship of the claim; individual intent or knowledge on the part of any named official; ministerial dishonesty; and any equivalence between the Brazaitis and Škirpa historical questions.

XVII. Site metadata and version history

99. One reproducibility problem should be placed before the Alliance rather than resolved by the submitting party. The historical publication chronology of the two pages and the dates currently rendered or indexed by the Centre's website are not identical. Page 3058 is traceable to a 2019 publication lineage through the Centre's own annual archive listing, yet the live page and its search indexing present a 2026 site date. Page 2969 has generated conflicting 2018 and 2026 dates across retained captures and site metadata.

- 100.** No inference of deliberate republication is drawn from metadata. A live page can be re-rendered, migrated, or re-dated without any change to the challenged sentence. The submission therefore relies on no precise original publication date, and the findings do not require one. The appropriate remedy is production: the content-management history of both pages, every substantive edit since 2018, and the meaning of each 2026 date marker. That request appears at Part XX.

XVIII. Pre-registered falsification conditions

- 101.** These conditions were fixed before this submission was drafted and are published so that the findings can be tested rather than merely asserted.
- 102.** If the Chapman letter, the Eilberg letter, or another American record contains an actual adjudicative finding of non-culpability, the claim narrows from an invented exoneration to a mischaracterization of a real finding.
- 103.** If the Centre produces a dated correction of any relevant letter or page made before 19 August 2026, persistence fails as to that instrument and the correction must be foregrounded.
- 104.** If the complete Ombudsman file shows that the Centre later withdrew reliance on the supposed Brazaitis exoneration, the operative-use finding narrows to the period before withdrawal.
- 105.** If a corrective act on the specific pages or letters followed the concession of 12 May 2026, the persistence-after-concession finding fails from the date of that act.
- 106.** If the complete 1974–75 administrative file shows Lithuanian archival access not reflected in the source-list memorandum, the sources-not-consulted section must be revised.
- 107.** If the Lithuanian original of the acknowledgment does not bear either working rendering, the operative-use finding must be restated in the terms the original supports.
- 108.** If contemporaneous internal records show that the Centre reasonably relied on a specific American adjudication and, after receiving the contrary legal and congressional notices, took timely documented steps to correct the public and official record, the inference of deliberate institutional deception must be narrowed to error or negligence for the period those records support.

XIX. Requested process

- 109.** The Alliance is asked to take six steps, none of which requires it to adjudicate a historical or criminal question.

Register and preserve. Register this submission with the petition of 28 May 2026 and preserve the captures and instruments referenced, so that the state of the public record on 6 and 12 August 2026 is fixed independently of subsequent editing.

Refer to the expert bodies. Refer the submission to the Committee on Antisemitism and Holocaust Denial, the Academic Working Group, and the Committee on the Holocaust,

Genocide, and Crimes Against Humanity, for consideration under the Working Definition and the Statement on Rehabilitation.

Invite a document-specific response. Invite the delegation of the Republic of Lithuania to respond in writing to the specific documents identified in Part XX below, rather than in general terms.

Encourage production. Encourage voluntary preservation and production of the working files identified below, recording non-production as an evidentiary boundary rather than as evidence of intent.

Invite correction. Invite the Republic of Lithuania to correct or withdraw the two public pages on their face by dated correction notice; to withdraw and reissue Letters Nos. 55R-21 and 14R-82; to notify each institution to which the American-exoneration claim was previously asserted; and to answer the outstanding question whether the characterization of congressional correspondence as the opinion of a politician is the position of the Government of Lithuania.

Preserve the right to supplement. Record that the submitting party may supplement this record if Lithuania produces the claimed correction, the complete Ombudsman working file, the complete United States immigration file, or any other document that narrows, defeats, or materially changes the propositions stated here.

XX. Production requested from the delegation of the Republic of Lithuania

- 110.** Identification of the American adjudication said to have exonerated or rehabilitated Brazaitis: the issuing authority, the date, the docket or file reference, and the text.
- 111.** The correction the Ministry of Foreign Affairs stated on 12 May 2026 had been made: its text, its date, the official who authorized it, and its public location.
- 112.** The communication by which the Centre informed the Ministry that the formulation had been corrected.
- 113.** The Lithuanian original, with certified translation, of the passages in Letter No. 55R-21 at pages 4 to 5 and in the Ombudsman record of 2 February 2018 recording undisclosed reliance on the supposed American exoneration, together with the Centre's own written explanations submitted to the Ombudsman in that proceeding.
- 114.** The complete text of the Centre's reply of 22 December 2020, reference No. 14R-2020-11-26, and confirmation whether the characterization of congressional correspondence as the opinion of a politician represents the position of the Government of Lithuania.
- 115.** The internal drafting and approval file for Letter No. 55R-21, genocid.lt page 2969, the pleading of 1 October 2018, Letter No. 14R-82, and genocid.lt page 3058, identifying the American documents actually consulted.
- 116.** A schedule of every further instrument in which the supposed American exoneration of Brazaitis has been relied upon in any historical assessment, whether published or not.

117. The Lithuanian original, with certified translation, of the characterization of the 1974 United States inquiry as exhaustive on genocid. It page 3058, together with the basis on which an inquiry expressly deactivated subject to reactivation is so described.
118. Confirmation whether Letters Nos. 55R-21 and 14R-82 remain in force, and an explanation of the absence of any response to the administrative demand of 17 July 2026.
119. If the formulation attributing rehabilitation to the United States Department of Justice is no longer maintained, the date on which the Republic of Lithuania ceased to maintain it and the institution that took that decision.
120. An explanation of the discrepancy by which the Centre's own publications date the supposed American rehabilitation to 1974 in one place and to 1975 in another.
121. The content-management history of genocid. It pages 2969 and 3058, identifying every substantive edit since 2018 and the meaning of each 2026 date rendered or indexed, and stating whether the challenged text was edited, migrated, re-dated, or republished after 12 May 2026.
122. A statement whether the Centre has withdrawn the undisclosed reliance on the supposed Brazaitis exoneration recorded by the Seimas Ombudsman in the Škirpa matter, and if so the instrument of withdrawal.
123. The current official status of the state honor and commemorative treatment of Brazaitis, and whether any Lithuanian state body has reviewed that treatment in the light of the ministerial concession of 12 May 2026.
124. The response of the Republic of Lithuania to the statement of the Alliance's expert chairs of 2019 concerning the Centre, and any act of acknowledgment or condemnation performed in consequence of it.
125. The non-privileged drafting, approval, and referral record for the statement on genocid. It page 2969 that the challenging research might implicate the Constitution and Criminal Code, including whether any referral to law-enforcement authorities was proposed, requested, or made in connection with that research.
126. The complete handling record for the administrative correction demand of 17 July 2026, including proof of receipt, internal routing, any decision not to acknowledge or answer it, and any draft response or request for further time.
127. All communications between the Centre and the Ministry of Foreign Affairs from 12 May 2026 through 19 August 2026 concerning the claimed correction, the continued publication of pages 2969 and 3058, and the status of Letters Nos. 55R-21 and 14R-82.

XXI. Positionality and disclosures

128. The submitting party is a United States citizen of Lithuanian-Jewish descent whose family was murdered in Lithuania in 1941. He is a complainant to Lithuanian state bodies from 2017, the petitioner in the IHRA petition of 28 May 2026 to which this submission is supplemental, and a litigant in related proceedings. He is not a neutral party and does not present himself as one. One further relationship is disclosed in case this submission is

referred to the Academic Working Group. The submitting party is a doctoral candidate in Holocaust and Genocide Studies at Gratz College, at which the current Chair of that Working Group holds an appointment. The submitting party has been in communication with him, that communication being limited to inquiries about the IHRA submission process and extending to no aspect of the merits of this submission or of the underlying record. The relationship and that contact are disclosed so that the Alliance may take whatever recusal, reassignment or other handling step it considers appropriate. The submitting party seeks no consideration arising from either and asks that none be given.

- 129.** Documents cited here that originate with the submitting party are identified as such. The findings advanced rest on instruments of the Lithuanian State, of Lithuanian oversight bodies, of Lithuanian courts, and of the United States Government, and not on the submitting party's own prior publications, which are excluded from the evidentiary basis of this submission.
- 130.** A ministerial reply of 26 May 2018 establishes ministerial engagement with the Centre's Škirpa findings from that date. It concerns the reburial process and not the Brazaitis claim, and is cited only at the level the document supports.³⁷
- 131.** The captures relied upon are held by the submitting party and hosted on a third-party content delivery network. Independent public web-archive capture of both pages, in both language versions, together with the two annual archive listings, is recommended and is not yet complete.

³⁷Ministry of Foreign Affairs of the Republic of Lithuania reply of 26 May 2018, Ref. (19.2.1)3-2853, signed by Vice-Minister Darius Skusevičius, concerning the Škirpa reburial commission. Cited only for the fact of ministerial engagement with the Centre's Škirpa findings from May 2018. It does not concern the Brazaitis exoneration claim and is not relied on as evidence of ministerial knowledge of that claim.

Supplemental Submission to the

International Holocaust Remembrance Alliance

The Škirpa Determination: Undisclosed Favorable Premises, an Unremedied Transparency Finding, Differential Attribution, and Persistence After Ministerial Correction

Submitted by Grant Arthur Gochin | 19 August 2026

Supplemental to the petition of 28 May 2026 concerning the member-country status of the Republic of Lithuania, and companion to the supplemental submission of 19 August 2026 concerning the attribution of a United States exoneration to Juozas Ambrazevičius-Brazaitis

Submitted to: Marcelo Mindlin, Chair of the Argentine Presidency of the IHRA for 2026; Ambassador Fabiana Loguzzo, Co-Chair; Michaela Küchler, Secretary General; and the IHRA Permanent Office.

Requested circulation and referral: the Academic Working Group; the Committee on Antisemitism and Holocaust Denial; the Committee on the Holocaust, Genocide, and Crimes Against Humanity; and the Heads of Delegation, with particular notice to the delegation of the Republic of Lithuania.

Core allegation: A state historical institution reached a favorable published determination concerning the founder and leader of the Lithuanian Activist Front while relying on favorable premises it did not disclose; an oversight body of the same State found that failure of transparency well founded; the determination was never reissued with its reasons stated; one of the undisclosed premises has since been conceded by that State's own foreign ministry to be legally imprecise; no reassessment of the determination that rested on it has been identified; and the Centre allowed both the original twenty-one-day production period and a separately granted final procedural opportunity to expire without substantive production.

Distribution and Notice

The recipients below are copied to create a contemporaneous notice record. Institutional observers are copied for notice and preservation; they are not asked to adjudicate the petition. This submission has also been published in full, on the date of filing, for public record and transparency, at [PUBLICATION LOCATION TO BE INSERTED ON FILING]. Publication is disclosed so that no recipient is placed on notice of a document already in the public domain without knowing it, and so that the state of the record on the filing date is independently verifiable.

Filed with: Marcelo Mindlin, Chair, 2026 Argentine Presidency of the IHRA; Ambassador Fabiana Loguzzo, Co-Chair; Michaela Küchler, Secretary General (SG@holocaustremembrance.com); IHRA Permanent Office (info@holocaustremembrance.com); Argentine Ministry of Foreign Affairs IHRA routes previously used (mnc@cancilleria.gob.ar; privada_clang@mrecic.gov.ar).

IHRA expert and delegation notice: Carson Phillips, Chair, Academic Working Group (cphillips@gratz.edu); Michael Newman, Chair, Committee on Antisemitism and Holocaust Denial (via IHRA Permanent Office); Jennifer Ciardelli, Chair, Committee on the Holocaust,

Genocide and Crimes Against Humanity and U.S. delegation member (via IHRA Permanent Office / USHMM); U.S. Department of State Holocaust-issues distribution (EUR-SEHI-DL@state.gov); Arezoo Hersel-Rohila, Israel Co-Head of Delegation (Arezoo.Hersel-rohila@mfa.gov.il); Iris Rosenberg, Israel Co-Head of Delegation (iris.rosenberg@yadvashem.org.il); Arvydas Daunoravičius, Lithuania Head of Delegation (via urm@urm.lt); Stanislovas Stasiulis, Lithuania Academic Working Group (stanislovas.stasiulis@istorija.lt); Ronaldas Racinskas (ronaldas.racinskas@lrvt.lt); Ingrida Vilkienė (ingrida.vilkienė@lrvt.lt); Faina Kukliansky (fainakukliansky@gmail.com).

Republic of Lithuania — diplomatic and state notice: Minister of Foreign Affairs Kęstutis Budrys (minister@urm.lt); Vice-Minister Vidmantas Verbickas (vidmantas.verbickas@urm.lt); Ambassador Gediminas Varvuolis, Embassy of Lithuania in Washington (amb.us@urm.lt); Ministry of Foreign Affairs (urm@urm.lt); International Commission for the Evaluation of the Crimes of the Nazi and Soviet Occupation Regimes in Lithuania (komisija@lrvt.lt); Office of the Seimas Ombudsman (ombuds@lrski.lt).

LGGRTC notice: Council of the Genocide and Resistance Research Centre (taryba@genocid.lt); Dr. Arūnas Bubnys (arunas.bubnys@genocid.lt); Centre general address (centras@genocid.lt); Evaldas Gelumauskas (evaldas.gelumauskas@genocid.lt); Kristina Burinskaitė (kristina.burinskaite@genocid.lt).

Lithuanian historical-research notice: Lithuanian Institute of History — Director Aurimas Švedas (aurimas.svedas@istorija.lt); Head of Twentieth-Century History Vitalija Stravinskienė (vitalija.stravinskiene@istorija.lt); Stanislovas Stasiulis (stanislovas.stasiulis@istorija.lt); Institute general address (istorija@istorija.lt).

Institutional observers: Yad Vashem — Iris Rosenberg and Yossi Gevir (yossi.gevir@yadvashem.org.il); United States Holocaust Memorial Museum — Jennifer Ciardelli (through IHRA/USHMM), Dr. Anna Ullrich (aullrich@ushmm.org), and Kyra Schuster (kschuster@ushmm.org); Victims of Communism Memorial Foundation / Victims of Communism Museum — President and CEO Dr. Eric Patterson, via info@victimsofcommunism.org.

Congressional notice: The Honorable Brad Sherman, United States House of Representatives, through Scott Abrams (Scott.Abrams@mail.house.gov) and Elia Groode (Elia.GroodeCA@mail.house.gov).

I. Nature of this submission

1. This is a supplemental evidence submission concerning the conduct of a Member Country. It supplements the petition of 28 May 2026 and its supplement of 3 June 2026, and is filed on the same footing.¹

¹ Petition to the International Holocaust Remembrance Alliance concerning the member-country status of the Republic of Lithuania, 28 May 2026, thirty-two pages: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/IHRA-Petition-Gochin-5-28-26.pdf>. Supplement of 3 June 2026. Procedural letter to Secretary General Michaela Küchler, 23 July 2026.

2. It is the companion to the supplemental submission of 19 August 2026 concerning the attribution of a United States exoneration to Juozas Ambrazevičius-Brazaitis.² The two submissions concern the same institution and the same correction practice applied to two figures. They are filed separately because the underlying records differ, and because a Member Country should be able to answer each on its own documents.
3. The question presented is not what Kazys Škirpa did in 1941. It is whether the reasoning practice by which a Member Country's state historical institution reached and maintained a favorable public determination about him falls within the conduct the Alliance's own instruments address.
4. The practice complained of has six documented stages. A state institution published a historical determination in October 2015. In official correspondence of February 2018 it disclosed that it had reached that determination while taking into account favorable considerations that the published determination did not mention, and identified them. An oversight body of the same State found, on 2 February 2018, that this failed the principle of transparency, and recognized the complaint as well founded. The determination was nonetheless never reissued with its reasons stated. In 2024 the institution produced a further report retaining the same evaluative architecture and admitting favorable material under a different apparent attribution threshold from adverse material. On 12 May 2026 the Ministry of Foreign Affairs conceded to a Member of the United States Congress that one of the undisclosed favorable premises was legally imprecise, without any identified reassessment of the determination that rested on it. Finally, the institution produced no substantive record in response to the July 2026 document demand within either the original twenty-one-day period or the separate final procedural opportunity ending 14 August 2026.
5. Each of those six stages is established by an instrument of the Lithuanian State or of a Lithuanian oversight body. None depends on the submitting party's characterization, and none requires a finding about the conduct of any individual in 1941.
6. The Alliance is asked to consider this conduct under the Working Definition of Holocaust Denial and Distortion, the Statement on Rehabilitation of 2020, and the 2020 Ministerial Declaration.

II. What is not claimed

7. This section is placed before the evidence rather than after it, because the boundaries of this submission are unusually important. A separate documentary study of the transmission of Škirpa's texts is in progress and is deliberately **not** before the Alliance. Nothing from it is relied on here.

Criminal guilt is not claimed. Kazys Škirpa was never convicted of any Holocaust-related offence by any court. No court is asked to convict him now, and no finding of criminal culpability is sought.

² Supplemental submission concerning the attribution of a United States exoneration to Juozas Ambrazevičius-Brazaitis, 19 August 2026: <https://grantgochin.substack.com/p/supplemental-submission-to-the-international>.

Operational responsibility is not claimed. Škirpa was in Berlin under German house arrest from the days following 23 June 1941. The submission does not assert that he directed, participated in, or was present at any killing, and it accepts that his physical absence limits claims of operational command.

General personal authorship of individual Front texts is not claimed. The submission does not claim that Škirpa personally drafted every Lithuanian Activist Front publication or every sentence attributed to the organization. A separate published-source passage is treated below only for what Škirpa retrospectively says he himself inserted into an administrative proposal; that statement is not generalized to other Front texts.

No archival finding is relied upon. The submission relies on no archival collation, no comparison of manuscript and publication, no claim about any archival leaf, and no unpublished document. Every proposition below can be checked against published instruments. The separate transmission study remains unverified in material respects and is therefore excluded in its entirety.

Personal intent of named officials is not claimed. The allegation concerns institutional reasoning and correction practice, not the private state of mind of any official.

Criminal fraud is not alleged. The Alliance has no criminal jurisdiction and none is invoked.

Commemorative outcomes are not sought. The Alliance is not asked to decide whether any street should bear a name or whether any plaque should be installed.

The two files are not merged. Material concerning Brazaitis appears here only because a Lithuanian state institution itself used it in reaching the Škirpa determination, and only to the extent of that use.

III. Applicable instruments

8. The Working Definition of Holocaust Denial and Distortion, adopted 10 October 2013, addresses intentional efforts to excuse or minimize the impact of the Holocaust or its principal elements, including the role of collaborators and allies of Nazi Germany, and attempts to blur responsibility.³
9. The Statement on Rehabilitation of 2020 addresses efforts to rehabilitate persons complicit in crimes of the Holocaust and calls upon Member Countries to engage accurately with national histories and to accept political responsibility for doing so.⁴
10. The 2020 Ministerial Declaration commits Member Countries to counter distortion, to encourage research, to preserve and make available archival material, and to deal openly and accurately with the historical record. The production requests at Part XVI are framed by reference to that commitment.⁵

³ IHRA Working Definition of Holocaust Denial and Distortion, adopted 10 October 2013: <https://holocaustremembrance.com/resources/working-definition-holocaust-denial-distortion>.

⁴ IHRA Statement on Rehabilitation, 2020: <https://holocaustremembrance.com/statements/ihra-statement-on-rehabilitation>.

IV. The Alliance has addressed this institution before

11. In 2019 the chairs and recent chairs of the Alliance's expert working groups and committees issued a statement expressing grave concern at the decision of the Genocide and Resistance Research Centre of Lithuania to justify the wartime actions of Jonas Noreika in relation to the Jews of Lithuania. The signature block opened with Ambassador Georges Santer, then Chair of the Alliance, Professor Yehuda Bauer, its Honorary Chair, and Dr. Wichert ten Have. The statement identified the Centre's text of 27 March 2019 as the most recent of a series of attempts to rehabilitate Noreika's reputation, applied the Working Definition to that conduct, and urged the Government of Lithuania and the Centre to acknowledge and condemn Noreika's activities during the German occupation.⁶
12. That statement is cited as institutional precedent concerning the same institution, and not as a determination in the present matter. Its relevance is that the Alliance's own experts identified a mechanism rather than merely disagreeing with a conclusion. The present submission describes the same institution reaching a favorable determination about a different figure by a route the institution itself has admitted it did not publish.

V. The determination and its published reasons

13. In October 2015 the Centre published a historical certificate concerning Kazys Škirpa. The submission does not attribute a reference number to that document; the Centre's numbered instrument in this matter is Report No. 9R-598 of 2024, addressed below.⁷
14. The certificate is not a document of simple concealment, and this submission does not describe it as one. It states that Škirpa's historical role is ambiguous. It acknowledges manifestations of antisemitism. It identifies him as the unanimously chosen leader of the Berlin Lithuanian Activist Front. It describes the organization's propaganda structure. It quotes the instruction of 19 March 1941 telling Jews to leave and directing that their property be taken. And it states that antisemitism in the Berlin Front was raised to a political level and may have encouraged some Lithuanian residents to become involved in the Holocaust.
15. The certificate then bounds the implication of that evidence in three ways: by citing research for the proposition that the Berlin Front proposed expulsion rather than extermination; by stating that members did not know before the war of a plan of total

⁵ 2020 IHRA Ministerial Declaration: <https://holocaustremembrance.com/resources/2020-ihra-ministerial-declaration>.

⁶ International Holocaust Remembrance Alliance, Statement on the Center for the Study of the Genocide and Resistance of Lithuania, 2019: <https://holocaustremembrance.com/statements/statement-center-study-genocide-resistance-lithuania>. Preservation copy: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Statement-on-Center-for-the-Study-of-the-Genocide-and-Resistance-of-Lithuania-IHRA.pdf>.

⁷ Genocide and Resistance Research Centre of Lithuania, historical certificate concerning Kazys Škirpa, October 2015: https://www.genocid.lt/UserFiles/File/Pazymos/201510_skirpa_pazyma01.pdf.

extermination; and by separating Škirpa from the killings at the Seventh Fort in Kaunas because he remained in Berlin.

16. The third limitation is legitimate as to operational responsibility, and this submission accepts it. The first two may be historically relevant. The methodological objection is narrower and is this: political incitement, expropriation, coercive removal and organizational leadership were not separately evaluated on their own terms, and the certificate does not state the evidentiary rule by which favorable retrospective assertions were weighed against contemporaneous organizational documents.
17. That objection, standing alone, would be an ordinary scholarly disagreement and would not be placed before the Alliance. What follows is not.

VI. The undisclosed evidentiary basis

18. On 26 February 2018 the Centre issued Letter No. 55R-21, addressed to the applicant and to the Seimas Ombudsman. In it the Centre stated that in writing the Škirpa finding it had also taken into account circumstantial evidence which was not mentioned in the finding. It then identified that evidence by example. The examples were the asserted complete exoneration of Juozas Brazaitis-Ambrazevičius by American authorities, and the fact that Škirpa had lived his last approximately thirty years in the United States without accusation by American authorities.⁸
19. The same acknowledgment is independently recorded by an oversight body of the Republic of Lithuania. In the record of the Seimas Ombudsman of 2 February 2018, Pažyma No. 4D-2017/1-1558/3D-317, signed by Augustinas Normantas, the Centre acknowledged that in reaching a favorable conclusion concerning Škirpa it had relied on circumstances not stated in its published conclusion, and identified the same two examples.⁹

Translation limitation. The two records of this acknowledgment are rendered differently in the working translations, one as extenuating circumstances and the other as circumstantial evidence not mentioned in the finding. These are probably two renderings of a single Lithuanian phrase. The Lithuanian original and a verified translation should be placed side by side before either formulation is quoted as the Centre's words, and the Alliance is asked to obtain the original text through Part XVI below. The finding advanced here does not depend on which rendering is correct: on either, undisclosed favorable material was weighed and was not published.

20. Both premises are defective in the same way, and the defect is a matter of reasoning rather than of history.

⁸ Genocide and Resistance Research Centre of Lithuania, Letter No. 55R-21, 26 February 2018, at pages 4 to 5 of the English translation:
<https://static-cdn.toi-media.com/blogs/uploads/2026/05/Genocide-Reply-2018-02-26-Holocaust-interpretation.pdf>.

⁹ Seimas Ombudsman of the Republic of Lithuania, Pažyma No. 4D-2017/1-1558/3D-317, 2 February 2018, Augustinas Normantas, twenty pages:
<https://static-cdn.toi-media.com/blogs/uploads/2026/05/4D-2017-1-1558-3D-317-2018-02-02.pdf>.

21. **The first premise is a foreign legal proposition that no foreign document supports.** No American document identified in this record contains an exoneration, acquittal, rehabilitation or adjudication of innocence concerning Brazaitis. The 1974 inquiry of the Immigration and Naturalization Service was deactivated, expressly subject to reactivation, without adjudication; the subject was never questioned and died before the Service reported. On 12 May 2026, under Ref. (19.2.3)3-2806, Vice-Minister Vidmantas Verbickas wrote to Representative Brad Sherman conceding that the Centre had acknowledged that the complete-exoneration formulation was legally imprecise, that regret had been expressed for the miswording, and that administrative discontinuation of an investigation is not equivalent to formal judicial exoneration under United States law. That concession is set out with its full documentary basis in the companion submission of this date and is not re-argued here.¹⁰
22. **The second premise is a non-sequitur of the same family.** That a man lived three decades in a foreign country without being accused by that country's authorities is not evidence about his conduct. It is evidence about the reach, priorities, information and archival access of a foreign administration. In 1974 the archives of the Lithuanian Soviet Socialist Republic were not available to American authorities, a limitation apparent on the face of the American source record in the companion matter. An absence of foreign accusation cannot support a historical conclusion about conduct documented in archives that the foreign authority could not consult.
23. The two premises therefore share a single structure: the silence or administrative inaction of a foreign state is converted into affirmative favorable evidence. Neither premise concerns anything Škirpa did.

23A. The connection was not confined to the Centre's explanation to the Ombudsman. In its Škirpa response of 11 July 2018, Letter No. 14R-51, the Centre again described Brazaitis as having been completely exonerated in the United States. On the same page it reproduced the American source stating instead that the names had been removed from an active list and that the investigations had been deactivated. The favorable American proposition was therefore used directly in the Škirpa file, in an instrument that reproduced the limiting language on which the proposition purportedly rested.¹¹

¹⁰ Vice-Minister Vidmantas Verbickas to Representative Brad Sherman, 12 May 2026, Ref. (19.2.3)3-2806, transmitted under cover from Ambassador Gediminas Varvuolis dated 13 May 2026 with six pages of American documents: <https://static-cdn.toi-media.com/blogs/uploads/2026/06/Letter-to-Rep.-Sherman.pdf>. The American documentary record is set out in the companion submission cited at note 2.

¹¹ Letter No. 14R-51 of 11 July 2018, cited above at note 13, at p. 5. The page carries both the statement attributed to Letter No. 55R-21 that Brazaitis was completely exonerated following a thorough United States investigation conducted at the request of Congress by the Immigration and Naturalization Service, together with the statement that Škirpa spent his last thirty years in the United States without accusation, and a quotation in English from Commissioner Chapman's letter of 27 December 1974 to Subcommittee Chairman Joshua Eilberg recording that the names of Brazaitis and Šlepetyš had been removed from the active list of alleged Nazi war criminals and the investigations relating thereto deactivated.

24. **The significance is not that the premises are weak. It is that they were used and not published.** A reader of the 2015 certificate cannot reproduce the weighting that produced its conclusions, because two of the considerations that entered that weighting were not stated in it. That is a reproducibility defect on the institution's own admission, and it was identified as a transparency failure by the State's own oversight body.

VII. The transparency finding, and what was not done about it

25. The Seimas Ombudsman found on 2 February 2018 a failure to observe the principle of transparency, and recognized the complaint as well founded.¹²
26. What matters for the Alliance is what followed. No reissued determination stating its reasons has been identified. No published audit of the source basis of the 2015 certificate has been identified. Letter No. 55R-21 of 26 February 2018 and Letter No. 14R-82 of 11 October 2018 have not been withdrawn, corrected or reissued.¹³
27. On 11 July 2018 the Centre issued Letter No. 14R-51, an eleven-page substantive reply addressing the allegation that postwar publications associated with Škirpa had altered or sanitized Front texts. The reply contains a methodological criticism that this submission adopts: that accusatory language is scientifically unhelpful unless translated into testable historical propositions. The reply then reproduces Bronys Raila's retrospective speculation that hostile actors may have supplemented the Front programme, and raises the possibility that antisemitic content was inserted into documents at a later date.¹⁴
28. A rival authenticity hypothesis cannot be excluded merely because it is exculpatory, and this submission does not ask the Alliance to exclude it. Soviet institutions did manipulate records, and authenticity must be testable. The objection is that the institution advanced the hypothesis without publishing the test: no provenance chain, no contemporaneous parallel copy, no forensic comparison, and no document-by-document source history accompanied it. A challenge that later texts lost adverse content was answered by a possibility that earlier texts gained it, and the public record contains no means of deciding between them.

¹² Seimas Ombudsman Pažyma No. 4D-2017/1-1558/3D-317, cited above at note 9.

¹³ Genocide and Resistance Research Centre of Lithuania, Letter No. 14R-82, 11 October 2018: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/4.-2018-10-11-Lietuvos-gyventoju-genocido-ir-rezistencijos-tyrimo-centro-rastas-Nr.-14R-82.pdf>.

¹⁴ Genocide and Resistance Research Centre of Lithuania, Letter No. 14R-51 of 11 July 2018, *Dėl informacijos pateikimo*, addressed to the applicant through advocate Rokas Rudzinskas in reply to a letter of 17 May 2018, eleven pages, signed by Director General Teresė Birutė Burauskaitė: https://static-cdn.toi-media.com/blogs/uploads/2026/05/GC_reply_Skirpa_20180711-1.pdf. The later-insertion material is at pp. 9–10: p. 9 reproduces Bronys Raila's statement, from *Laisvės kovų archyvas* 1995 no. 15, that he did not recall the sixteenth paragraph of the Front programme and supposed that someone was later interested in supplementing it, naming the NKVD, the KGB and Jews; the Centre then formulates the question whether Soviet security could have falsified the documents by inserting antisemitic content.

29. That is the same defect as in Part VI, in a second instrument and six months after the oversight finding: a load-bearing evidentiary proposition asserted without the material that would allow a reader to reproduce or refute it.

VIII. The 2024 report and the asymmetry of attribution

30. Report No. 9R-598 was prepared in 2024 in connection with a live commemoration process concerning a proposed Škirpa plaque.¹⁵
31. The report did not suppress adverse material, and this submission does not allege that it did. It reproduces substantial adverse Front texts, including the demand of 19 March 1941 that Jews leave and that their property be taken. The objection concerns how the cumulative significance of that material was bounded.
32. The report retained the evaluative architecture visible in 2015: attribution of radical texts to Bronys Raila or to factions; the distinction between expulsion and extermination; emphasis on the absence of knowledge of a plan of total extermination; and the separation of Škirpa's Berlin location from the killings in Lithuania. The retention can be measured. Of the 2,228 overlapping twelve-word sequences in the 2015 certificate, approximately 62 per cent appear verbatim in the 2024 report; whole paragraphs are carried across word for word, including the paragraph containing the citation discussed at Part IX-A. That a later report reuses an earlier one is not itself an objection. It is material only because the evidentiary basis of the earlier instrument was admitted in 2018 to include favorable premises it did not disclose, and was found by the Ombudsman to have failed the principle of transparency.¹⁶

¹⁵ Genocide and Resistance Research Centre of Lithuania, Report No. 9R-598 (9.6E), 25 June 2024, published 8 August 2024: https://www.genocid.lt/UserFiles/File/Titulinis/2024/20240808_skirpa_pazyma.pdf. Preservation copy: https://static-cdn.toi-media.com/blogs/uploads/2026/07/20240808_skirpa_pazyma.pdf.

¹⁶ Comparison of *Dėl Kazio Škirpos veiklos Antrojo pasaulinio karo metais* (2015), cited above at note 7, with Report No. 9R-598, cited above at note 14, performed 19 August 2026 on the files published by the Centre. Method: text extracted from each PDF, whitespace collapsed, the 2015 text divided into every overlapping sequence of twelve whitespace-separated words, and each sequence tested for verbatim presence in the 2024 text. The denominator is 2,228 sequences. On the extraction used here, 1,384 sequences are present, which is 62.1 per cent; an independent re-extraction produced 1,379, which is 61.9 per cent. The count varies by a handful of sequences according to the text-extraction tool and its treatment of the apostrophe form *LAF'o* used in the 2024 text against the form *LAF* used in 2015; treating those forms as equivalent raises the count to 1,439. The figure is therefore stated as approximately 62 per cent, and the proposition does not depend on the second decimal place. The material new in 2024 includes the *Draugas* item and the question built upon it, the definition of collaboration drawn from Tininis and the conclusion that Škirpa was not a collaborator, and additional page references in two citations. The 2015 closing summary, stating that antisemitism in the Berlin Front's activity was raised to a political level and could have encouraged part of Lithuania's population to become involved in the Holocaust, does not appear in the 2024 report. That is a statement about the closing formulation only: the 2024 report separately reproduces Truska's proposition that Front proclamations were one of the reasons why some Lithuanians took part in carrying out Nazi criminal orders, and it is

33. It also relied on a report in the newspaper *Draugas* of 25 June 1941, stating that the last reports from Berlin said Škirpa had prohibited the persecution of Jews. In a Lithuanian public broadcaster examination of September 2024, Professor Saulius Sužiedėlis stated that no corresponding prohibition had been found in primary archival sources or in memoirs, and Simonas Jazavita questioned the chronology.¹⁷

33A. The report does not merely quote that item. Having reproduced it, the report states that a question remains unexamined to this day: why Škirpa prohibited the persecution of Jews in Lithuania, given the manifestations of antisemitism in the activity of the Berlin Front he led. The prohibition is thereby carried out of an unattributed second-hand newspaper report and into the Centre's own research question as an established fact. The question posed is not whether he prohibited, but why. No underlying order, transmission record or identified original source is supplied anywhere in the report.¹⁸

34. **The asymmetry is visible without any inquiry into motive, and it is the heart of this Part.** For adverse organizational texts, the institution's approach requires that a text be personally attributable to Škirpa before responsibility follows from it. For favorable material, an unattributed second-hand newspaper report of what unidentified reports from Berlin were said to contain was admitted into the analysis, and the report supplies no underlying order, no transmission record and no identified original source by which its weight could be compared with the contemporaneous organizational documents.

not said that the underlying adverse proposition was eliminated.

¹⁷ Aleknavičė, "Tikrasis Škirpos veidas: didvyris ar antisemitizmui pasidavęs kolaborantas," LRT.lt, 15 September 2024: <https://www.lrt.lt/naujienos/lietuvoje/2/2357594/tikrasis-skirpos-veidas-didvyris-ar-antisemitizmui-pasidaves-kolaborantas>. English version, "Lithuania's Škirpa: national hero or collaborator who succumbed to anti-Semitism?", LRT, 18 September 2024: <https://www.lrt.lt/en/news-in-english/19/2361061/lithuania-s-skirpa-national-hero-or-collaborator-who-succumbed-to-anti-semitism>. The Lithuanian original carries the statements of Professor Sužiedėlis concerning the *Draugas* source, the alleged deletion and antisemitism as integral to the Front programme, and the criticism of Dr. Klumbys that the source selection leaned toward exoneration; the English version carries the same reporting.

¹⁸ Alfredas Rukšėnas and Arūnas Bubnys, *Dėl Kazio Škirpos asmenybės (istorinė-archyvinė pažyma)*, LGGRTC Report No. 9R-598 (9.6E), 25 June 2024, audited in full on 19 August 2026 in the copy hosted by the Lithuanian Jewish Community at https://www.lzb.lt/wp-content/uploads/2024/08/20240808_skirpa_pazyma-1-1.pdf. The Centre's own copy is at https://www.genocid.lt/UserFiles/File/Titulinis/2024/20240808_skirpa_pazyma.pdf. The audit searched the complete text for every citation to the 1973 volume, for the proposal and its German recipient in every form, for the eight principles and point 5, for the first-person initiative statement, and for printed pp. 165, 166 and 167. The two copies have been confirmed identical: both files are seven pages and 2,915 words and share the MD5 digest 31711751895d8ede6e5a496c716ee74d, and their extracted text is identical without variation. The copy-identity condition is discharged. The same search design applied to the 2015 certificate returns the same result.

35. To the same effect, the undisclosed premises at Part VI were admitted without any evidentiary threshold at all: a foreign legal conclusion that no foreign document contained, and an absence of foreign accusation.
36. The Alliance is not asked to decide what weight the *Draugas* item deserves. It is asked to consider whether a Member Country's state historical institution may apply a demanding standard of attribution to material adverse to a figure and a permissive one to material favorable to him, without stating either standard.
37. The same broadcast discussion is important for a further reason: it records disagreement among Lithuanian historians rather than a single external accusation. Sužiedėlis described antisemitism and anticommunism as integral to the Front programme. Jazavita argued that if Škirpa receives leadership credit for the uprising, leadership responsibility cannot simply disappear when antisemitic organizational statements are evaluated. Valdemaras Klumbys criticized the report's source selection as leaning toward exoneration. Those are attributed scholarly judgments and are not adopted here as findings. They establish that the methodological dispute is internal to Lithuanian scholarship.¹⁹
38. The interinstitutional commission subsequently recorded that no decision was adopted on the proposed plaque. That procedural outcome neither validates nor invalidates the report. It establishes that the state commemoration process did not culminate in a settled expert conclusion.²⁰

IX. The source the institution cites is an expressly abridged participant compilation

39. One further matter is properly before the Alliance because it appears on the face of a published book and requires no archival access.
40. The Centre's certificate cites Škirpa's own documentary survey of 1973, *Sukilimas Lietuvos suverenumui atstatyti*, a compilation edited and published by the participant himself. In that volume, at the point where he presents the instruction of 24 March 1941, Škirpa states that he omits Sections I to IV of the instruction as general material and proceeds directly to Section V.²¹
41. Two consequences follow, and they point in opposite directions. First, the abridgment is disclosed on the page: the author states that he is omitting material, and the omission was therefore not concealed from a reader of the book. Second, and for that very reason, the volume announces on its own face that it is not a complete diplomatic transcription of the documents it presents.

¹⁹ As above at note 15.

²⁰ Record of the interinstitutional commission of 19 September 2024 recording that no decision was adopted on the proposed plaque: https://www.genocid.lt/centras/lt/4443/a/print_version/.

²¹ Kazys Škirpa, *Sukilimas Lietuvos suverenumui atstatyti: Dokumentinė apžvalga* (Washington, 1973), public digital copy: <https://grantgochin.com/wp-content/uploads/2026/08/Sukilimas-Lietuvos-suverenumui-atstatyti-Kazys-Skirpa.pdf>.

42. This submission draws no inference about what the omitted sections contain, and asserts none. The proposition advanced is only this: when a state institution relies on a participant-edited compilation that declares its own abridgment, ordinary source criticism requires the institution to state whether the cited passages were checked against the underlying documentary layer, and the published record does not state it.

Locator. The declaration appears at public PDF page 153, corresponding to printed page 171 on the verified page offset. The submission draws no inference from the contents of Sections I to IV; the point is the disclosed abridgment and the need to identify the documentary layer used by the Centre.²²

IX-A. The published first-person source-use test

A separate passage in the same 1973 volume now supplies a narrower attribution test that does not depend on the archival transmission study. The volume's document register lists item 18, "Principiniai paryškinimai prie administracinio aparato sudarymo išlaisvintoje Lietuvoje," at printed page 165. In the body Škirpa calls the underlying instrument the "Administracijos sudarymo pasiūlymas" (Verwaltungs Vorschlag), states that all of the personnel lists were handed to Lieutenant Colonel Graebe on 3 March 1941, immediately before explaining that those lists were grouped into the Administracijos sudarymo pasiūlymas, and then sets out eight introductory principles. Point 5 expressly names Jews, together with other persons characterized as pillars of the Soviet regime, for immediate dismissal and, where necessary, arrest and accountability. Immediately after point 8, Škirpa writes that "all those points" were inserted into the proposal's introduction solely on his initiative, without Graebe specifically asking him to do so, and then gives the statehood rationale for doing so.²³

The page convention is important. Item 18 begins at printed page 165, corresponding to public PDF page 147; point 5 is on printed page 166 / PDF page 148; and the first-person initiative statement is on printed page 167 / PDF page 149. The Centre's 2015 certificate separately cites Škirpa's book at printed pages 149–150 in a paragraph concerning TDA and the restoration plan. Those cited pages are not item 18. This submission therefore does not claim that either instrument cited the exact initiative passage and ignored it.²⁴

²² Škirpa, Sukilimas, public PDF p. 153 = printed p. 171 on the verified offset (printed page = public PDF page + 18). The offset is independently confirmed at document-register item 18: printed p. 165 = public PDF p. 147.

²³ Kazys Škirpa, Sukilimas Lietuvos suverenumui atstatyti: Dokumentinė apžvalga (Washington, D.C.: published by the author, 1973), document register item 18; printed pp. 165–167 / public PDF pp. 147–149. The body names the instrument Administracijos sudarymo pasiūlymas (Verwaltungs Vorschlag); the handover of the personnel lists to Lieutenant Colonel Graebe on 3 March 1941 is stated at printed p. 165 / public PDF p. 147, immediately before the grouping of those lists into the Administracijos sudarymo pasiūlymas; point 5 appears on printed p. 166 and the first-person initiative statement on printed p. 167. Public copy: <https://grantgochin.com/wp-content/uploads/2026/08/Sukilimas-Lietuvos-suverenumui-atstatyti-Kazys-Skirpa.pdf>.

²⁴ Škirpa, Sukilimas, register item 18 at printed p. 165. The verified mapping is printed page = public PDF page + 18. The Centre's historical certificate of October 2015, *Dėl Kazio Škirpos veiklos Antrojo pasaulinio karo metais*, cited above at note 7, separately cites Škirpa, Sukilimas,

A direct audit of Report No. 9R-598, on the file published by the Centre, establishes what the report does contain. It cites the 1973 volume twice: at printed pages 149–150, 184, 189–191, 299 and 301, for the organization and composition of the Tautos darbo apsauga; and at printed pages 459–463, for Škirpa’s letter of 24 June 1941 to State Secretary von Weizsäcker and his memorandum of 23 July 1941. It does not cite printed pages 165 to 167. It does not name the *Administracijos sudarymo pasiūlymas* or its German recipient, and it does not reproduce, enumerate or discuss the eight principles, point 5, or the first-person initiative statement, either at those pages or anywhere else without them. The same search design applied to the 2015 certificate returns the same result: two citations to the volume, neither to pages 165 to 167, and no mention of the proposal, its recipient, the principles or the initiative statement.²⁵

The proposition that follows is narrow and is one of source method. The report uses the volume as authority for two sets of propositions that are neutral or favorable to Škirpa, while not engaging the adverse first-person passage in the same volume, and states no source-use rule explaining that difference. The question for production is whether the Centre consulted or weighed item 18 at all, and under what rule.

Evidentiary limitation. Nothing here asserts that the Centre suppressed, concealed or deliberately omitted the passage, and nothing here describes what its researcher read or knew. A published report’s silence is a fact about the report; the internal question is answered only by the working file, which is requested at Part XVI. The audit was performed on the file published by the Centre, confirmed byte-identical to the copy hosted by the Lithuanian Jewish Community. The Lithuanian passage rendered above was transcribed from the published volume by a Lithuanian archival researcher and checked against the page images by the submitting party; it has not been separately certified by an independent translator, and the falsification condition at paragraph 83 governs it. The statement of Škirpa’s own is retrospective: it proves what Škirpa

at printed pp. 149–150, 184 and 189–191 at its page 3, which then moves into the discussion of Berlin Front antisemitism and Raila; those printed pp. 149–150 are not item 18. No reference number is attributed to the 2015 document. Report No. 9R-598 carries a citation to the same volume at printed pp. 149–150, 184, 189–191, 299 and 301, in its own discussion of the Tautos darbo apsauga. The two strings are not identical: the 2024 string is the 2015 string with two page references added. Both documents also carry a second and identical citation to the volume at printed pp. 459–463. Neither cites printed pp. 165–167.

²⁵ Alfredas Rukšėnas and Arūnas Bubnys, *Dėl Kazio Škirpos asmenybės (istorinė-archyvinė pažyma)*, LGRTC Report No. 9R-598 (9.6E), 25 June 2024, audited in full on 19 August 2026 in the copy hosted by the Lithuanian Jewish Community at https://www.lzb.lt/wp-content/uploads/2024/08/20240808_skirpa_pazyma-1-1.pdf. The Centre’s own copy is at https://www.genocid.lt/UserFiles/File/Titulinis/2024/20240808_skirpa_pazyma.pdf. The audit searched the complete text for every citation to the 1973 volume, for the proposal and its German recipient in every form, for the eight principles and point 5, for the first-person initiative statement, and for printed pp. 165, 166 and 167. The two copies have been confirmed identical: both files are seven pages and 2,915 words and share the MD5 digest 31711751895d8ede6e5a496c716ee74d, and their extracted text is identical without variation. The copy-identity condition is discharged. The same search design applied to the 2015 certificate returns the same result.

said in 1973 about his own role in the 1941 proposal; standing alone it is not independent contemporaneous proof that he personally drafted every word. Nor does it establish operational responsibility for later killings. Its present importance is methodological. If a state report requires personal attribution before adverse organizational material may bear on Škirpa, his own published statement that he inserted the entire eight-point package on his initiative is a source that must either be weighed or expressly distinguished. Before filing, the English rendering and the exact treatment of this passage in Report No. 9R-598 must be independently verified.

X. Notice, and conduct after notice

43. The Centre and the Lithuanian State have been on notice of these objections since 2017, in writing, repeatedly.
44. The counted record includes the presidential follow-up signed 6 March 2017 and received 7 March 2017; a letter of 15 May 2018 concerning the Centre's Škirpa finding, copied to Jewish and diplomatic recipients; a demand of 26 June 2018 for a timetable for the promised Škirpa review; and a further complaint of 19 September 2018 concerning Škirpa and Brazaitis together.²⁶
45. The state response chain runs alongside it. Letter No. 55R-21 defended the findings on 26 February 2018. The Ministry of Foreign Affairs replied on 26 May 2018 under Ref. (19.2.1)3-2853, signed by Vice-Minister Darius Skusevičius, concerning the reburial commission and referring historical evaluation to the International Commission; that letter is cited only for the fact of ministerial engagement with the Centre's Škirpa findings from that date.²⁷ The Ombudsman responded in June 2018. The Centre issued its substantive reply on 11 July 2018 and Letter No. 14R-82 on 11 October 2018.
46. On 22 May 2026 the Centre published a public response referring to the applicant's recent letters concerning Škirpa and Noreika, invoking possible violations of the Constitution and the Criminal Code of the Republic of Lithuania, and repeating the claim that Brazaitis had been rehabilitated by the United States Department of Justice.²⁸
47. The relevance of that publication here is institutional and is limited. The Alliance is not asked to determine whether the statement was lawful under Lithuanian law, and no such determination is sought. The 2020 Ministerial Declaration commits Member Countries to encourage research and to deal openly and accurately with the historical record, and the

²⁶ Lithuania Accountability and Litigation Inventory, edition of 5 August 2026: fifty counted formal actions, S-01 to S-50, the IHRA petition of 28 May 2026 counted separately, aggregate fifty-one. European Court of Human Rights Application No. 10930/21 was declared inadmissible and is closed.

²⁷ Ministry of Foreign Affairs of the Republic of Lithuania reply of 26 May 2018, Ref. (19.2.1)3-2853, signed by Vice-Minister Darius Skusevičius, concerning the Škirpa reburial commission. Cited only for the fact of ministerial engagement with the Centre's Škirpa findings from May 2018.

²⁸ Genocide and Resistance Research Centre of Lithuania, *Dėl informacijos pateikimo*, public response of 22 May 2026: <https://www.genocid.lt/centras/lt/2969/a/>. Capture: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/Regarding-the-provision-of-information.pdf>.

Alliance is asked to consider the effect on open historical inquiry when a state memory institution answers a documentary challenge by invoking the criminal law against the challenge. Criminal proceedings under Article 170-2 § 1 concerning statements about the Holocaust-era record are presently listed for hearing in Lithuania on 26 August 2026; that prosecution is not the subject of this submission and no finding is sought about it. It is noted only because it describes the legal environment in which historical dispute in that Member Country now takes place.²⁹

48. On 17 July 2026 a formal administrative demand sought the withdrawal, correction and reissue of the Centre's letters carrying the Škirpa and Brazaitis positions. As at the date of this submission no response of any kind has been received.³⁰
49. On 20 July 2026, transmitted 21 July, an open letter concerning Report No. 9R-598 and the 2015 certificate requested substantive response, evidence, correction and record preservation within twenty-one days. That period expired on 11 August 2026. No substantive production was identified. On 11 August, a follow-up in the existing email thread then provided a separate and expressly limited final procedural opportunity through 5:00 p.m. Vilnius time on 14 August 2026, while stating that it did not restart or extend the original period. That additional opportunity also elapsed without substantive production or a compliant request for additional time. The two periods are recorded separately, and nonproduction is treated as an evidentiary boundary rather than as evidence of motive, concealment, or the truth of any historical proposition.³¹

XI. Persistence after the ministerial concession

50. On 12 May 2026 the Ministry of Foreign Affairs conceded that the complete-exoneration formulation concerning Brazaitis was legally imprecise, and stated expressly that its clarification was based on information provided by the Centre.
51. That premise was, on the Centre's own admission of February 2018, one of the considerations weighed in reaching the Škirpa determination.

²⁹ Criminal Case No. 02-2-00512-24, Vilnius City District Court, charged under Article 170-2 § 1 and Article 313 § 2 of the Criminal Code of the Republic of Lithuania; hearing listed for 26 August 2026. Cited for context only; no finding concerning that prosecution is sought.

³⁰ Re-application of 17 July 2026 for the office of Director General of the Genocide and Resistance Research Centre, containing a formal administrative request for withdrawal, correction and reissue of Letters Nos. 55R-21 and 14R-82 and for action on the Centre's public pages: <https://grantgochin.substack.com/p/re-application-director-general-lggrtc>. Action S-50 in the accountability inventory.

³¹ Grant Arthur Gochin to LGGRTC Council, Arūnas Bubnys and copied Lithuanian institutional recipients, 11 August 2026, reply in the existing thread "Published at: <https://open.substack.com/pub/grantgochin/p/the-skirpa-report-cannot-stand>." The message recorded the original deadline and provided a separate final procedural opportunity through 5:00 p.m. Vilnius time on 14 August 2026, expressly without restarting or extending the original twenty-one-day period.

52. The consequence is a narrow and testable proposition. A favorable premise used in reaching a published determination about Škirpa has been conceded by the Member Country's own foreign ministry to be legally imprecise. No reassessment of the determination that relied on it has been identified. No withdrawal of that reliance has been identified. No corrected or reissued determination has been identified. Ninety-nine days elapsed between that concession and the date of this submission.
53. The Alliance is asked to note the structure rather than to characterize it. When the foreign-law premise fails, an assessment resting in part on it does not thereby become wrong. It becomes unreproducible until the institution states what the assessment rests on without it. Nothing of that kind has been published.

XI-A. Current status of the Škirpa determination as at 19 August 2026

The present record therefore contains three distinct correction failures, which should not be collapsed. First, the 2018 Ombudsman transparency finding was not followed by an identified reissued determination stating the reasons actually used. Second, the 12 May 2026 ministerial concession undermined one of the favorable premises that the Centre had itself identified as part of the Škirpa reasoning, without an identified reassessment of that determination. Third, the July–August 2026 production process yielded no substantive production within either the original period or the separate final opportunity.

None of those facts proves that the historical conclusion about Škirpa is false. Together they establish a reproducibility problem: the State has acknowledged an undisclosed decisional input, an oversight body has found a transparency failure, one input has later been conceded legally imprecise, and no public re-weighting of the determination without that input has been identified.

XI-B. The missing corrective mechanism

The issue placed before the Alliance is therefore not merely whether one historical source was read differently. A state oversight mechanism identified a transparency defect, yet the historical determination was not reissued with the omitted reasoning exposed. A later foreign-ministry correction of one premise did not itself amend the Centre's historical instruments. And the Centre's own working file — the record that could show what was consulted, how contrary material was treated, and whether later correction occurred — was requested but not produced within the periods stated above.

That sequence is the institutional reason for seeking IHRA involvement. The requested remedy is not a verdict on Škirpa. It is a document-specific corrective process capable of distinguishing what is established, what is disputed, what source rule was applied, and what must be revised if a premise no longer stands.

XII. Materiality

54. The Alliance is not asked to determine the wartime conduct of the Lithuanian Activist Front. It is asked to note why a favorable state determination concerning its founder and leader is a matter within the Alliance's instruments rather than a domestic historiographical dispute.

55. On the Centre's own published account, Škirpa was the unanimously chosen leader of the Berlin Front; the Front's propaganda apparatus issued the instruction of 19 March 1941 telling Jews to leave Lithuania and directing that their property be taken; and antisemitism within the Berlin Front was raised to a political level and may have encouraged some Lithuanian residents to become involved in the Holocaust. Those propositions are the institution's own, not the submitting party's.
 56. The determination has commemorative consequence in the Member Country. A Vilnius street bearing Škirpa's name was renamed in 2019 following public controversy. A commemorative plaque was proposed in 2024, and the interinstitutional commission recorded that no decision was adopted. The state's historical determination is the document to which such processes refer.
- 56A. On 23 August 2024, the Lithuanian Jewish Community, stating that it represented thirty-two Lithuanian and foreign Jewish organizations, categorically rejected Report No. 9R-598; an English version of the statement was published on 26 August.³²
57. That is the conduct the Statement on Rehabilitation addresses: not a scholar's contested conclusion, but a State's institutional treatment of a figure whose organization the State's own institution describes in the terms set out above.

XIII. Findings by confidence level

Established on documents held

58. The Centre stated in Letter No. 55R-21 of 26 February 2018 that it took into account, in reaching the Škirpa finding, material not mentioned in that finding, and identified the asserted American exoneration of Brazaitis and Škirpa's unaccused American residence as examples.
59. The Seimas Ombudsman recorded the same acknowledgment on 2 February 2018, found a failure to observe the principle of transparency, and recognized the complaint as well founded.
60. No reissued determination stating its reasons, and no published source-use audit, has been identified. Letters Nos. 55R-21 and 14R-82 have not been withdrawn, corrected or reissued.
61. The Ministry of Foreign Affairs conceded on 12 May 2026 that the complete-exoneration formulation was legally imprecise and that administrative discontinuation is not formal judicial exoneration under United States law.

³² Lithuanian Jewish (Litvak) Community, statement on the newest report of the Genocide and Resistance Research Centre concerning Kazys Škirpa, 23 August 2024: <https://www.lzb.lt/2024/08/23/lietuvos-zydu-litvaku-bendruomenes-pareiskimas-del-lietuvos-gyventoju-genocido-ir-rezistensijos-tyrimo-centro-naujausios-ataskaitos-apie-kazi-skirpa/>. English version published 26 August 2024: <https://www.lzb.lt/en/2024/08/26/lithuanian-jewish-community-statement-on-genocide-centers-newest-report-on-kazys-skirpa/>.

62. No reassessment of the Škirpa determination following that concession has been identified.
63. The reply of 11 July 2018 advanced a later-insertion hypothesis without publishing a provenance chain, a parallel copy, a forensic comparison, or a document-by-document source history.
64. Report No. 9R-598 relied on the *Draugas* item of 25 June 1941 without supplying the underlying order, its transmission record, or an identified original source.
65. The 1973 volume on which the Centre relies declares on its own page that the presentation of the 24 March 1941 instruction omits Sections I to IV. The declaration is located at printed page 171 / public PDF page 153; the prior printed-page uncertainty is resolved.
66. The administrative demand of 17 July 2026 is unanswered. The requested twenty-one-day period associated with the 20 July notice elapsed without substantive production, and the separate final procedural opportunity through 5:00 p.m. Vilnius time on 14 August 2026 also elapsed without substantive production or a compliant request for additional time. The second period did not restart or extend the first.

66A. In Report No. 9R-598, as published by the Centre, and in the 2015 certificate, the Centre cites Škirpa's 1973 volume twice in each document but does not cite or discuss item 18, printed pp. 165–167, the administrative proposal, point 5, its German recipient, or Škirpa's first-person initiative statement.

66C. Approximately 62 per cent of the twelve-word sequences in the 2015 certificate appear verbatim in Report No. 9R-598.

66B. Report No. 9R-598 formulates its own research question on the premise that Škirpa prohibited the persecution of Jews, asking why he did so rather than whether he did so, while supplying no underlying order, transmission record or identified original source.

Supported institutional inference

67. Taken together — undisclosed favorable premises, an oversight finding of failed transparency, no reissued determination, a rival hypothesis advanced without its test, an asymmetrical standard of attribution, and no reassessment after the ministerial concession — the record supports the inference that the institution has maintained a favorable determination whose evidentiary basis it has never made reproducible, after specific and repeated notice. The inference is institutional. Individual dishonesty is neither required nor claimed.

Provisional and excluded from the principal findings

68. The precise wording of the Centre's acknowledgment, pending the Lithuanian original.
69. The content of item 18 itself remains outside the principal findings until a named competent reader confirms the English rendering. It is provisionally verified as to the Lithuanian page sequence and wording: item 18 begins at printed page 165, point 5

appears on printed page 166, and the initiative statement on printed page 167. It is excluded from the principal findings until a named competent reader confirms the filing translation. The source-use audit of Report No. 9R-598 is complete and is recorded at paragraph 66A; the treatment of the passage in the 2015 certificate remains to be established.

70. The entire documentary-transmission study, which is excluded in full and is not before the Alliance.

Unresolved

71. What the Centre communicated to the Ministry before the Ministry's statement of 12 May 2026.
72. Whether the Centre has at any time withdrawn its reliance on the Brazaitis premise in the Škirpa matter.
73. Which editions of the Front documents were consulted in preparing Report No. 9R-598.

Not claimed

74. Criminal guilt; operational responsibility; generalized personal authorship of Front texts; individual intent or knowledge of any named official; and any commemorative outcome.

XIV. Pre-registered falsification conditions

75. These conditions are fixed before filing and published so that the findings can be tested rather than merely asserted.
76. If the Centre produces a determination reissued with its reasons stated, or a published source-use audit of the 2015 certificate, the transparency-persistence finding fails as to that instrument.
77. If the Centre produces a dated instrument withdrawing its reliance on the Brazaitis premise in the Škirpa matter, the persistence-after-concession finding fails from the date of that instrument.
78. If the Lithuanian original of the acknowledgment does not bear either working rendering, the undisclosed-basis finding must be restated in the terms the original supports.
79. If Report No. 9R-598 or the 2015 certificate states the evidentiary rule by which favorable and adverse material were weighed, and applies it consistently when every citation is read in context, the asymmetry finding fails or narrows.
80. If the Centre produces the underlying Škirpa prohibition order behind the *Draugas* item, with its transmission record and identified original source, that element of the asymmetry finding fails.
81. If the Centre produces a published provenance test accompanying the later-insertion hypothesis of July 2018, paragraph 63 fails.

82. If the Centre demonstrates that the two undisclosed premises were immaterial to the 2015 conclusions, the operative-use element narrows to a transparency point and no more.
83. If a substantive response to the demand of 17 July 2026, the notice of 20 July 2026, or the separate final opportunity ending 14 August 2026 is produced with a date preceding this submission, the corresponding nonproduction finding must be corrected. If a named competent reader does not confirm that the 1973 passage attributes inclusion of all eight introductory points to Škirpa's own initiative, or if the grammatical scope excludes point 5, the item 18 source-use proposition is withdrawn. If any citation to printed pages 165 to 167, or any discussion of the proposal, the principles, the initiative statement or its German recipient, is located anywhere in that report or in an annex to it, the classification changes and the source-method proposition at Part IX-A fails or narrows. If an internal working file shows that the passage was read and expressly distinguished, the finding narrows to a failure to publish the reasoning rather than a failure to engage the source. If the 2015 certificate identifies, discusses and weighs item 18 under the same attribution rule applied to other material, the corresponding inference as to that instrument fails or narrows.

XV. Requested process

84. The Alliance is asked to take six steps, none of which requires it to adjudicate a historical or criminal question.

Register and preserve. Register this submission with the petition of 28 May 2026 and with the companion submission of this date.

Refer to the expert bodies. Refer it to the Committee on Antisemitism and Holocaust Denial, the Academic Working Group, and the Committee on the Holocaust, Genocide, and Crimes Against Humanity, for consideration under the Working Definition and the Statement on Rehabilitation.

Invite a document-specific response. Invite the delegation of the Republic of Lithuania to respond in writing to the specific documents identified at Part XVI, rather than in general terms.

Encourage production. Encourage voluntary preservation and production of the working files identified below, recording non-production as an evidentiary boundary rather than as evidence of intent.

Invite correction. Invite the Republic of Lithuania to state publicly the evidentiary basis of the 2015 determination without the two undisclosed premises; to state whether that determination has been reassessed since 12 May 2026; to disclose whether item 18 / printed pages 165–167 of Škirpa's 1973 volume were considered under the Centre's attribution methodology; and to withdraw and reissue Letters Nos. 55R-21 and 14R-82 where correction is required.

Preserve the right to supplement. Record that the submitting party may supplement this record, including with the documentary-transmission study when its verification is complete, and that Lithuania's production may narrow or defeat propositions stated here.

XVI. Production requested from the delegation of the Republic of Lithuania

85. The Lithuanian original, with certified translation, of the passages in Letter No. 55R-21 at pages 4 to 5 and in the Ombudsman record of 2 February 2018 recording reliance on considerations not stated in the published finding, together with the Centre's own written explanations submitted to the Ombudsman in that proceeding.
86. A statement whether the Centre has withdrawn its reliance on the asserted Brazaitis exoneration and on Škirpa's unaccused American residence in the Škirpa matter, and if so the instrument of withdrawal and its date.
87. Any reassessment, review, internal note or correspondence concerning the Škirpa determination produced after 12 May 2026, and a statement whether the determination has been reassessed in the light of the ministerial concession of that date.
88. The internal research file behind Report No. 9R-598: the instructions given to the researcher, the research notes and source list, drafts and internal reviews, correspondence with the plaque commission, and **the records identifying which editions of the Lithuanian Activist Front documents were consulted.**
89. The provenance of the *Draugas* item of 25 June 1941: the underlying Škirpa order or prohibition, its transmission record, and the identified original source.
90. The evidentiary rule applied in the 2015 certificate and in Report No. 9R-598 for attributing an adverse Front text to Škirpa, stated in the institution's own words, together with the rule applied to favorable retrospective assertions.
91. The full text of the reply of 11 July 2018 and any provenance test, forensic comparison or document-by-document source history prepared in support of the later-insertion hypothesis it advances.
92. The complete apparatus of the 2015 certificate: footnotes, bibliography and attachments, or a statement that none exists beyond the published text.
93. The records of the interinstitutional commission concerning the proposed Škirpa plaque, and any subsequent statement of the Centre affirming that the 2015 or 2024 conclusions remain in force.
94. The complete handling record for the administrative demand of 17 July 2026 and for the notice of 20 July 2026, including proof of receipt, internal routing, and any decision not to respond.
95. The non-privileged drafting, approval and referral record for the public statement of 22 May 2026 invoking the Constitution and the Criminal Code, including whether any referral to law-enforcement authorities was proposed, requested or made in connection with the research challenging the Centre's findings.
96. The response of the Republic of Lithuania to the statement of the Alliance's expert chairs of 2019 concerning the Centre, and any act of acknowledgment or condemnation performed in consequence of it.

Additional request — item 18. A document-specific statement whether the 2015 certificate and Report No. 9R-598 consulted or considered item 18 of Škirpa’s 1973 document register, beginning at printed page 165, including point 5 and the first-person initiative statement at printed pages 166–167; if considered, identify how it was weighed; if not considered, state that fact.

Additional request — edition and pagination. Identification of the exact physical or digital edition of Škirpa’s 1973 volume used in 2015 and 2024, including the page-number convention applied in the Centre’s citations, and any research note, excerpt, scan or working copy covering printed pages 165–167.

XVII. Positionality and disclosures

97. The submitting party is a United States citizen of Lithuanian-Jewish descent whose family was murdered in Lithuania in 1941. He is a complainant to Lithuanian state bodies from 2017, the petitioner in the IHRA petition of 28 May 2026 to which this submission is supplemental, and a litigant in related proceedings. He is not a neutral party and does not present himself as one.
98. One further relationship is disclosed in case this submission is referred to the Academic Working Group. The submitting party is a doctoral candidate in Holocaust and Genocide Studies at Gratz College, at which the current Chair of that Working Group holds an appointment. Communication with him has been limited to inquiries about the IHRA submission process and has extended to no aspect of the merits of this submission or of the underlying record. The relationship and that contact are disclosed so that the Alliance may take whatever recusal, reassignment or other handling step it considers appropriate. The submitting party seeks no consideration arising from either and asks that none be given.
99. The findings advanced rest on instruments of the Lithuanian State and of Lithuanian oversight bodies, and not on the submitting party’s own prior publications, which are excluded from the evidentiary basis of this submission.
100. A separate documentary study concerning the transmission of Škirpa’s texts is in progress. It is deliberately withheld from this submission because its verification is incomplete. The submitting party undertakes that no proposition from that study will be advanced before the Alliance until it has been independently verified.
101. A research return concerning item 18 was supplied on 19 August 2026 by Evaldas Balčiūnas, a paid archival researcher who is separately a co-author with the submitting party on a different Noreika documentary project. That relationship is disclosed. The filing does not ask the Alliance to accept his interpretation as authority: the relevant Lithuanian text is checked against the public 1973 page images, and any English quotation used in the transmitted version must be independently verified by a named competent reader.

DRAFTING CONTROL — REMOVE BEFORE TRANSMISSION: Do not state that the 2015 certificate cited item 18 or the point-5/initiative pages. Its citation to printed pp. 149–

150 is a different location. Do not activate the item 18 finding until the English verification and the 2024 source-use check are complete.