

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.

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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).

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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[genocid.lt](https://www.genocid.lt/centras/lt/2969/a/) page 2969, Dėl informacijos pateikimo: <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[genocid.lt](https://www.genocid.lt/centras/lt/3058/a/) page 3058, Genocido tyrimo centras nepasiduos vulgariam spaudimui: <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.