

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.