

**REVISED AND UPDATED SUBMISSION
FOR TRANSMISSION TO THE
INTERNATIONAL HOLOCAUST REMEMBRANCE ALLIANCE**

The Škirpa Determination

*State historical method, undisclosed favorable premises, documentary continuity,
attribution, and persistence after notice and correction*

Submitted by Grant Arthur Gochin | 24 September 2026

To	Arvydas Daunoravičius, Head of the Republic of Lithuania's Delegation to the International Holocaust Remembrance Alliance (IHRA), Ministry of Foreign Affairs of the Republic of Lithuania
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Applicant	Grant Arthur Gochin, citizen of the Republic of Lithuania
Purpose	Transmission to the IHRA Chair, Secretary General, and relevant expert bodies for internal consideration
Status	Revised Škirpa-only evidentiary submission. It supersedes the factual presentation of the Škirpa supplemental submission of 19 August 2026, but does not withdraw the petition of 28 May 2026 or the formal Lithuanian-delegation transmission request of 24 September 2026.
Language	English
Requested handling	Transmission without alteration or endorsement; preservation of the record; written confirmation of the route taken.

Executive request

I ask Lithuania's Head of Delegation to transmit this revised Škirpa submission, without alteration and without any requirement that the Lithuanian delegation endorse it, to the IHRA Chair, the Secretary General, and the expert bodies competent to consider Holocaust distortion, rehabilitation, historical research, and archival access. I ask that it be registered with the documentary sequence that began with my petition of 28 May 2026 and that I receive written confirmation of the route taken.

This redraft is narrower than the version reviewed after the 19 August filing: it is exclusively about Kazys Škirpa and the Lithuanian state's historical treatment of the Škirpa record. It draws on separately filed matters only where they bear directly on the Škirpa reasoning.

The reason for redrafting rather than merely forwarding the August filing is that the Škirpa record has materially expanded. The August submission deliberately excluded a still-developing documentary-transmission study. Since then, primary archival images, an official Seimas file, two 1939 scholarly source leads with precise archival locators, and Finnish Foreign Ministry material have become available or have been organized into a reproducible chain. The revised submission incorporates those

developments while retaining the same limiting principle: IHRA is being asked to examine state historical method and correction practice, not to convict Kazys Škirpa of a crime.

This filing also preserves the membership-status question raised by my petition of 28 May 2026. My allegation is not limited to one disputed historical conclusion. I contend that the Škirpa record forms part of a recurrent institutional pattern in which a state historical body used favorable reasoning that was not disclosed, applied inconsistent attribution thresholds, relied on a foreign 'exoneration' premise later conceded to be legally imprecise, and failed to publish a complete corrective re-weighting after notice.

I characterize the cumulative LGGRTC record as a sustained and extensive pattern of Holocaust distortion. I do not ask the Lithuanian delegation itself to accept that characterization. I ask IHRA to test the documented conduct against its own Working Definition, the Stockholm Declaration, the 2020 Ministerial Declaration, the Statement on Rehabilitation, and the Alliance's guidance on distortion, and to determine the institutional consequences, if any, if non-compliance is found and remains uncured.

I. Scope and express limits

This filing asks whether the reasoning and correction practice of a state historical institution concerning the founder and leader of the Berlin Lithuanian Activist Front should be examined under IHRA's tools on Holocaust distortion and rehabilitation.

- No criminal conviction or finding of criminal guilt is requested.
- No claim is made that Škirpa was physically present at, directed, or participated in the mass shootings in Lithuania while he remained in Berlin.
- No claim is made that Škirpa personally drafted every sentence of every LAF document.
- No request is made that IHRA decide whether a street, plaque, or other memorial should bear his name.
- No private intent or dishonesty is attributed to any named Lithuanian official. The complaint concerns institutional source use, disclosed reasoning, correction, and reproducibility.
- Immediate authorship, organizational leadership, authorization, circulation, retrospective knowledge, political responsibility, and operational responsibility are treated as separate propositions and are not collapsed into one another.

I am not a lawyer. Legal references are included to identify standards invoked in Lithuanian state records and IHRA instruments; this submission is principally an evidentiary and institutional-method filing.

II. Procedural route to the Lithuanian IHRA delegation

IHRA's current Lithuania country page identifies Arvydas Daunoravičius of the Ministry of Foreign Affairs as Head of Lithuania's national delegation. Earlier correspondence from the IHRA Secretariat stated that there is no process for external submission of petitions, and the German IHRA route subsequently recommended that I direct the matter to the national delegation corresponding to my citizenship. I am a citizen of the Republic of Lithuania. A separate signed request of 24 September 2026 therefore asks the Lithuanian delegation to transmit the documentary complaint into IHRA's internal process without requiring the delegation to endorse it.

IHRA Lithuania country page: <https://holocaustremembrance.com/countries/lithuania>

Formal Lithuanian-delegation transmission request, 24 September 2026: https://static-cdn.toi-media.com/blogs/uploads/2026/09/IHRA_Lithuania_Formal_Request_BILINGUAL_LT_AUTHENTIC_2026-09-24_signed.pdf

III. Applicable IHRA framework

The Working Definition of Holocaust Denial and Distortion identifies, among other forms of distortion, 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. The 2020 Statement on Rehabilitation condemns attempts to rehabilitate the reputations of persons complicit in the crimes of the Holocaust and calls for open and accurate engagement with national histories. This submission does not presuppose that those standards have been violated; it asks IHRA to examine the documented state method against its own framework.

IHRA had already addressed this institution before the present filing. In April 2019, chairs and recent chairs of IHRA expert bodies expressed grave concern about LGGRTC's treatment of Jonas Noreika and invoked the Alliance's distortion framework. That statement is not a merits decision in the Škirpa matter, but it shows that the institutional source-method problem falls within a field IHRA has previously examined.

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

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

IHRA 2019 statement concerning LGGRTC: <https://holocaustremembrance.com/statements/statement-center-study-genocide-resistance-lithuania>

IHRA's later guidance illustrates how the Working Definition's item (a) applies to national narratives. Its 'Understanding Holocaust Distortion' resource states that portraying the Holocaust as irrelevant to a nation's history because it was a Nazi German organized crime can be distortion when that framing ignores the roles of local collaborators. I rely on that guidance only as an interpretive aid to item (a), not as a separate binding rule.

IHRA, Understanding Holocaust Distortion: Contexts, Influences and Examples: <https://www.holocaustremembrance.com/wp-content/uploads/2023/09/Understanding-Holocaust-Distortion-Contexts-Influences-and-Examples-IHRA.pdf>

IV. Membership-compliance question: whether Lithuania continues to satisfy the commitments on which IHRA membership is based

IHRA's Membership and Application Procedure states that new Member Countries are welcomed on the basis of adherence to the Stockholm Declaration of 28 January 2000 and the 2020 IHRA Ministerial Declaration. Lithuania's country page records that Lithuania joined the IHRA in 2002. I therefore distinguish the standards by time: the 2015 Škirpa determination is assessed against the Stockholm Declaration and the Working Definition adopted by IHRA Member Countries in 2013; the 2024 report and post-2020 persistence or correction practice are also assessed against the 2020 Ministerial Declaration and the 2020 Statement on Rehabilitation.

IHRA Membership and Application Procedure: <https://holocaustremembrance.com/who-we-are/member-countries/membership-and-application-procedure>

IHRA Lithuania country page: <https://holocaustremembrance.com/countries/lithuania>

The public materials I have located explain admission but do not publish a dedicated external procedure for suspension, downgrade, or expulsion of an existing Member Country. The current admission procedure also says that consensus is sought on applications. I do not assume from that text either that Lithuania's consent would be required for every later status measure or that it would not be. I ask IHRA to identify the governing procedure and, before any status sanction, to identify graduated measures that can lawfully be taken without prejudging that procedural question—for example, an expert-body assessment, a Chair's request for a written response, placement of the matter on a Plenary agenda, and defined corrective benchmarks, if IHRA's rules permit them.

The current application procedure also states that a candidate country should satisfy IHRA that Holocaust-period archives are open for research, that there is or will be academic, educational, and public examination of the country's Holocaust-era past, and that the applicant endorses previous IHRA decisions. I use those provisions as evidence of IHRA's present membership baseline, not as a claim that the exact current application procedure governed Lithuania's 2002 accession or that any single later defect automatically terminates membership.

LGGRTC's conduct is state conduct for purposes of this request. Lithuanian law establishes the Centre as a state budget institution and assigns the Seimas the owner's rights and duties. Report No. 9R-598 was prepared within LGGRTC's delegated functions for an interinstitutional state commemoration process; the 24 September 2026 prosecutorial decision expressly records that delegated-function setting; and on 12 May 2026 the Ministry of Foreign Affairs relayed LGGRTC's position to the United States Congress. I therefore ask IHRA to evaluate the conduct as part of the Republic's institutional record, without attributing private intent to individual officials.

Current LGGRTC statute (e-Seimas): <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.40706/asr>

A. The allegation presented for IHRA determination

The allegation advanced is that the record now goes beyond an ordinary dispute among historians. The controlled Škirpa file documents: an admitted undisclosed favorable evidentiary basis; a Seimas Ombudsman transparency finding; reuse of a foreign 'complete exoneration' proposition while the same state instrument reproduced narrower American language; a later Foreign Ministry concession that the proposition was legally imprecise; only partial public correction; a 2024 state report that preserved favorable architecture without publishing a consistent attribution rule; and primary-source objections that had been on formal notice since 2017.

The broader May 28 petition characterizes LGGRTC's conduct as a longer-running institutional distortion problem. This Škirpa filing independently documents the controlled period from 2015 through 2026, with earlier 1994-1995 state-memory context. It should therefore not be read as independent proof of every broader allegation in the May petition; it is a document-specific case study that IHRA can test.

B. IHRA commitments potentially implicated by the Škirpa record

Temporal scope	IHRA standard / membership baseline	Documented Škirpa/LGGRTC issue	Question for IHRA
Membership baseline; current procedure (Lithuania joined 2002)	Current application procedure: adherence to Stockholm; Holocaust-period archives open for research; academic, educational and public examination of the national Holocaust-era past; endorsement of previous IHRA decisions.	The primary archival chain is increasingly public, but the source-use and working-file record behind 9R-598 has not been produced in this record. The working file is not itself a 1933-1950 archive; its relevance is to reproducibility and public/academic examination.	Whether current Lithuanian practice remains consistent with the membership baseline IHRA now articulates, without treating admission conditions as an automatic expulsion rule.
2015 determination: Stockholm 2000 + Working Definition adopted 2013	Stockholm §3 and Working Definition item (a): uphold Holocaust truth; scrutinize intentional efforts to excuse or minimize the Holocaust or its principal elements, including the role of collaborators and allies of Nazi Germany.	The 2015 determination acknowledged LAF antisemitism and expulsion policy, used favorable premises not disclosed in the published reasoning, and bounded the adverse record through expulsion-versus-genocide and other limiting propositions.	Whether the 2015 method, on the evidence and any intent threshold IHRA applies, falls within item (a) or otherwise conflicts with Stockholm §3.
2015 and 2024	Stockholm §§4-5: strengthen Holocaust education, remembrance and research; encourage study of the Holocaust in all its dimensions.	Adverse LAF material is present, but the published state reports do not state a reproducible rule explaining why adverse organizational evidence is subjected to stricter attribution than some favorable material.	Whether the published method supports study 'in all its dimensions' or narrows the record through an unstated weighting rule.
2015 and 2024	Stockholm §7: throw light on obscured aspects of the	Relevant archival texts are now publicly preserved; the dispute concerns how they	Whether Lithuania should be invited to disclose the research apparatus necessary

	Holocaust and facilitate archival access.	were selected, attributed and weighed, and the internal source-use record has not been produced here.	for independent testing of the state determination.
Post-2020 persistence; 2024 report; 2026 correction practice	2020 Ministerial Declaration §7: governments accept responsibility to work together to counter Holocaust denial and distortion.	After the 2018 transparency finding, the State retained a favorable Škirpa determination; in 2026 one favorable premise was conceded legally imprecise and only partial public correction has been identified.	Whether the post-2020 persistence and correction response constitute adequate action to counter distortion if IHRA finds distortion present.
Post-2020	2020 Ministerial Declaration §8: promote education, remembrance and research to counter historical distortion.	Report No. 9R-598 was state historical work prepared for a contemporary commemoration process.	Whether the report and its source method meet the research and anti-distortion standard the Declaration seeks to advance.
Post-2020	2020 Ministerial Declaration §9: safeguard the historical record, including the role of fascist and extreme-nationalist partners and other collaborators.	LVIII, LXIV, item 18, the 1939 antecedents, and Škirpa's own cross-reference bear on the political program and organizational record of the Berlin LAF. Report No. 9R-598 expressly states on p. 5 that the 'Jewish problem' was proposed to be solved not by genocide but by expulsion from Lithuania; the 2015 determination uses the same limiting distinction at pp. 4–6.	Whether the State's treatment safeguards the collaborator record in full or systematically discounts evidence relevant to organizational responsibility.
Post-2020	2020 Ministerial Declaration §10: identify, preserve and make available archival material and testimony.	Specific primary archival records are identified and publicly preserved, while the internal source list, drafts, provenance analysis and reviewer record behind 9R-598 remain requested.	Whether preservation and access are sufficient for independent verification, distinguishing Holocaust-era archives from later institutional working records.
Post-2020; hortatory text read with §9 and Rehabilitation Statement	Ministerial Declaration §11 encourages countries and societies to address their pasts openly and accurately; the Rehabilitation Statement applies that principle directly to rehabilitation concerns.	The Ombudsman found a transparency failure; a favorable premise was later corrected by the Foreign Ministry; no public reissued Škirpa determination with fresh weighting has been identified.	Whether Lithuania's post-2020 response meets the open-and-accurate-history standard IHRA encourages, while recognizing that §11 is hortatory rather than framed as a mandatory clause.
Post-2020	IHRA Statement on Rehabilitation: condemn rehabilitation of persons complicit in Holocaust crimes; promote research, public awareness and political responsibility; engage accurately with national histories.	The record links Škirpa to leadership of the Berlin LAF; his manuscript expressly links him retrospectively to LXIV; item 18 contains a first-person initiative statement; LXIV calls for collective expulsion, expropriation and civic exclusion. The 2019 IHRA statement treated documented ghettoization and expropriation as material to a rehabilitation analysis.	Whether this evidence reaches the Statement's complicity/rehabilitation threshold is for IHRA to decide; this filing does not concede that threshold in advance.

C. Why the 2019 IHRA statement matters to the membership question

On 11 April 2019, IHRA's expert leadership publicly addressed the same Lithuanian state institution. The signature block opened with Ambassador Georges Santer, then IHRA Chair; Professor Yehuda Bauer, Honorary Chair; and Dr. Wichert ten Have, IHRA Adviser, followed by current and former chairs of the expert bodies. They described LGGRTC's 27 March 2019 Noreika text as the latest in a series of attempts to rehabilitate his reputation and stressed the documentary record of his key role in ghettoization and expropriation of Jewish property. The Škirpa record is not identical, but the comparison is methodologically relevant: the 2015 determination treats expulsion rather than genocide as a limiting distinction (2015 determination, pp. 4–6), and Report No. 9R-598 repeats that proposition expressly on p. 5. The 2019 statement was not a membership ruling and did not decide Škirpa's case. It did, however, put the same institution on public IHRA notice that rehabilitation analysis must engage the full collaborator record rather than neutralize it through a narrowing frame.

D. Membership status is a compliance question, not a historical verdict

I ask a compliance question rather than a political verdict on Lithuania as a whole: whether the documented conduct of a Member Country's state historical institution, together with the State's oversight and correction response, remains compatible with the commitments IHRA associates with membership. If IHRA finds non-compliance, the next questions are what cure is required, whether cure has occurred, and which procedural measures are available under the Alliance's rules.

I preserve the relief requested in my petition of 28 May 2026: review, corrective action, and—if IHRA itself finds material, continuing, uncured non-compliance and determines that its governing procedures permit such measures—consideration of suspension, downgrade, or revocation of Member-Country status. I do not state that any one of those outcomes is mandatory under a published rule.

E. Requested compliance determination

I ask IHRA to make a reasoned, document-specific determination on the following points:

- Which Stockholm Declaration and 2020 Ministerial Declaration commitments are engaged by the Škirpa record?
- Whether the documented conduct meets the Working Definition of Holocaust Denial and Distortion, including any intent element IHRA considers necessary.
- Whether the 2018 Ombudsman finding, the 2026 Foreign Ministry correction, and the absence of an identified reissued Škirpa determination constitute adequate cure.
- Whether the 2024 Report No. 9R-598 is methodologically reproducible under a single attribution standard applied to favorable and adverse evidence.
- What corrective measures Lithuania should be invited to take if IHRA finds non-compliance.
- What membership-status consequences, if any, IHRA's rules permit if a Member Country is found materially and persistently non-compliant and refuses or fails to cure.

V. The state determination and the institutional question

The 2015 Škirpa determination is not a document of simple concealment. The official record, preserved in the 2026 Seimas production as LGGRTC letter No. 13R-267 of 25 September 2015, acknowledges manifestations of antisemitism in the Berlin LAF, identifies Škirpa as its leader, reproduces anti-Jewish organizational language, and states that LAF proclamations may have helped create conditions in which some Lithuanians became involved in Nazi criminal orders. It nevertheless reaches a favorable overall institutional treatment by emphasizing expulsion rather than genocide, absence of prewar knowledge of total extermination, and Škirpa's physical separation from the VII Fort killings because he remained in Berlin (2015 determination, pp. 4–6).

In 2024 LGGRTC issued Report No. 9R-598 in connection with the interinstitutional process concerning a proposed Škirpa plaque in Vilnius. The report is not identical to the 2015 instrument and it reproduces substantial adverse material. The methodological objection is therefore not that adverse evidence disappeared. It is that the attribution and weighting rules remain unstated and difficult to reproduce.

The carry-forward from the 2015 determination to Report No. 9R-598 is independently testable in three specific limiting propositions: (1) the distinction between expulsion and genocide (2015 determination, pp. 4–6; Report No. 9R-598, p. 5); (2) the proposition that Berlin LAF members lacked prewar knowledge of a Nazi plan to exterminate all Jews (2015 determination, pp. 4–6; Report No. 9R-598, p. 5); and (3) the separation of Škirpa from the VII Fort killings by reference to his Berlin location and absence from Lithuania (2015 determination, pp. 4–6; Report No. 9R-598, p. 7). The relevance of this

continuity is that the earlier determination had an admitted undisclosed evidentiary basis and an Ombudsman transparency finding.

The 2024 report also has a defined institutional authorship chain. LGGRTC's public notice identifies historian Dr. Alfredas Rukšėnas as the report's preparer, and the report itself carries Director General Dr. Arūnas Bubnys in the signature block. The prosecutor's decision of 24 September 2026 independently describes the same chain: the report was prepared within LGGRTC's delegated functions by historian Dr. Alfredas Rukšėnas and signed by Director General Dr. Arūnas Bubnys. I state this only to identify authorship and institutional issuance; no inference about either man's private intent is drawn from it.

2015 LGGRTC Škirpa determination: https://www.genocid.lt/UserFiles/File/Pazymos/201510_skirpa_pazyma01.pdf

Preservation copy of Report No. 9R-598: https://static-cdn.toi-media.com/blogs/uploads/2026/07/20240808_skirpa_pazyma.pdf

VI. The 2018 oversight record: favorable reasoning was used but not published

A major development since the August IHRA filing is that the Seimas Human Rights Committee produced the official 2017-2018 file. The certified electronic copy was registered by the Seimas Chancellery on 23 September 2026 as No. S-2026-4031. It contains the Committee correspondence, LGGRTC replies, the full Seimas Ombudsman report, the 2017 appeal and complaint, and the Committee's later report to the Speaker.

The file records a decisive institutional fact: LGGRTC acknowledged that in preparing the Škirpa conclusion it had taken into account circumstances that were not stated in the published conclusion. The favorable examples identified were the asserted American 'complete exoneration' of Juozas Ambrazevičius-Brazaitis and the fact that Škirpa lived for decades in the United States without accusation. Neither proposition concerns anything Škirpa did in Lithuania or Berlin during 1940-1941.

The Seimas Ombudsman found that the Centre failed to observe the principle of transparency, did not provide the clear and reasoned response required by public-administration standards, recognized the complaint regarding the Centre's officials as justified, and stated that signs of systematic improper implementation of legal requirements could be discerned in the Centre's handling of persons' requests.

Unpublished considerations are not inherently improper. The defect here is reproducibility: a reader of the 2015 determination could not know that these favorable foreign-state premises entered the weighting, and the State's own oversight mechanism later identified the omission as a transparency failure.

Seimas Human Rights Committee response package with English translation: https://static-cdn.toi-media.com/blogs/uploads/2026/09/Seimas_HRC_Response_2026-09-22_Gochin_with_English_Translation.pdf

LGGRTC 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>

VII. The favorable American premise was used directly in the Škirpa file and later corrected by Lithuania

The foreign-exoneration premise was not merely mentioned in an abstract oversight exchange. In LGGRTC Letter No. 14R-51 of 11 July 2018, its substantive reply in the Škirpa matter, the Centre again described Brazaitis as having been completely exonerated in the United States. On the same page it reproduced the American language stating that the names had been removed from an active list and that the investigations had been deactivated. The stronger Lithuanian proposition and the narrower American administrative wording therefore appeared together inside the Škirpa file.

On 12 May 2026, Vice-Minister of Foreign Affairs Vidmantas Verbickas wrote to U.S. Representative Brad Sherman under Ref. (19.2.3)3-2806. The Ministry stated, on information supplied by LGGRTC, that the Centre had acknowledged that the 'complete exoneration' formulation was legally imprecise,

expressed regret for the wording, and recognized that administrative discontinuation of an investigation is not equivalent to formal judicial exoneration under United States law.

That correction does not prove that the historical conclusion concerning Škirpa is false. It creates a narrower institutional question: what does the favorable determination rest on after one of the favorable inputs the Centre itself identified has been conceded to be legally imprecise? As of 24 September 2026, I have identified no public reissued Škirpa determination stating a fresh weighting without that premise.

The second undisclosed favorable premise is methodologically similar: decades of residence in the United States without accusation is evidence about the reach, information, priorities, and archival access of American authorities, not affirmative evidence of wartime conduct. The two premises therefore share a source-method problem: foreign silence or administrative inaction was converted into favorable historical evidence.

The Centre did later demonstrate that it could amend the public record. On 26 August 2026, page 3058 was visibly edited and marked 'pataisyta 2026 08 26': one use of reabilituoti ('rehabilitated') was removed and replaced with wording that the men had been removed from the list of suspects. The correction was partial. A separate statement on the same page continued to attribute a rehabilitation of Brazaitis to the United States Department of Justice, and page 2969 continued to state that he had been rehabilitated by the U.S. Justice Department.

That edit matters to the Škirpa file because the American 'complete exoneration' was one of the two favorable circumstances LGGRTC itself said it used when explaining the Škirpa determination. The issue is not whether every Brazaitis page belongs in a Škirpa submission; it is whether the favorable premise actually used in the Škirpa reasoning has been fully withdrawn and the Škirpa determination re-weighted after correction.

LGGRTC page 3058: <https://www.genocid.lt/centras/lt/3058/a/>

LGGRTC page 2969: <https://www.genocid.lt/centras/lt/2969/a/>

Annotated August 2026 correction comparison: https://static-cdn.toi-media.com/blogs/uploads/2026/08/LGGRTC_Annotated_Exhibit_2026-08-30.png

LGGRTC Letter No. 14R-51, 11 July 2018: https://static-cdn.toi-media.com/blogs/uploads/2026/05/GC_reply_Skirpa_20180711-1.pdf

MFA reply transmitted to Representative Sherman, 12 May 2026: <https://static-cdn.toi-media.com/blogs/uploads/2026/06/Letter-to-Rep.-Sherman.pdf>

VIII. The official Seimas file proves specific notice of the anti-Jewish documentary problem in 2017

The new Seimas package resolves another question: whether the archival issues now raised were first invented in 2026. They were not. The 2017 complaint reproduced in the official file specifically identified the 24 March 1941 'Instructions for the Liberation of Lithuania' and a document revoking the historic hospitality or refuge associated with Vytautas the Great. It complained that the favorable state conclusion did not engage those materials adequately. The Ombudsman later required LGGRTC to address the questions and arguments raised.

The state therefore had specific notice of the March 1941 documentary problem years before Report No. 9R-598 was prepared in 2024. The significance is procedural as well as historical: the 2024 report followed a state oversight proceeding in which the same source problem had already been identified, the Centre's handling had been criticized, and a clear reasoned response had been recommended.

IX. The primary-source chain is now public and stronger than it was in August

Archival custody and authorship must be kept separate. LCVA fond 648 is the Lithuanian Legation in London fond. The materials discussed below are preserved there in apyrašas 2, files b. 581 and b. 582. Their presence in that fond establishes archival custody and provenance; it does not by itself establish Škirpa's personal authorship of every document in the files.

A. Document LV: the 'Revocation of Hospitality to Jews' draft

The b. 582 annex index identifies Document LV, Svetingumo atšaukimas žydams ('Revocation of Hospitality to Jews'), at folios 182-183 and marks it as a projektas — a draft. The 2017 complaint quoted the document as revoking the historic right of refuge, warning Jews to leave with Soviet forces, and threatening remaining Jews with confiscation, expulsion, court-martial, or severe punishment. Because the primary scan of LV is not relied on here, I do not present it as an issued proclamation or as proof of Škirpa's personal authorship. Its importance is that the disputed document was already specifically identified to Lithuanian institutions in 2017 and is catalogued in b. 582 among the documentary appendices preserved in the Lithuanian Legation in London fond.

B. Document LVIII: 24 March 1941 strictly secret instructions

LCVA f. 648, ap. 2, b. 582 preserves Document LVIII, dated 24 March 1941, marked 'STRICTLY SECRET,' and titled 'Instructions for the Liberation of Lithuania.' The opening directs that its contents be transmitted to uprising centers only orally and through completely trusted couriers. In the uprising-preparation section it calls for intensified anti-Communist and anti-Jewish action and states the objective of forcing all Jews to flee Lithuania with the retreating Soviet forces. Later, 'Force the Jews to flee Lithuania' appears as a numbered operational task.

The same document states that an atmosphere should be created in which Jews could not expect even minimum rights or a livelihood in the projected 'New Lithuania' and invokes revocation of the hospitality associated with Vytautas the Great. This places the anti-Jewish objective inside clandestine operational guidance, not only in public rhetoric.

Public copy — Document LVIII, fols. 188-197: https://grantgochin.com/wp-content/uploads/2026/09/LCVA_F648_A2_B582_Document_LVIII_1941-03-24_Strictly_Secret_Instructions.pdf

C. Document LXIV: expulsion, expropriation and civic exclusion

Document LXIV, LCVA f. 648, ap. 2, b. 582, folios 213-215, is issued in the institutional name of the Lithuanian Activist Front. It orders every Lithuanian Jew without exception to leave Lithuania, provides for Jewish movable and immovable property to pass into Lithuanian national ownership, declares that Jews would have no civil rights or possibility of livelihood in the restored state, and states that the old right of refuge associated with Vytautas the Great is 'completely and finally revoked.'

LVIII and LXIV therefore repeat materially parallel propositions: anti-Jewish mobilization, collective removal, denial of rights and livelihood, and revocation of the Vytautas-era protection. The repetition supports an institutional continuity inference between secret uprising preparation and the later LAF appeal. It does not, by itself, prove personal authorship by Škirpa.

Public copy — Document LXIV, fols. 213-215: https://grantgochin.com/wp-content/uploads/2026/09/LCVA_F648_A2_B582_Document_LXIV_LAF_Anti-Jewish_Appeal_Fols_213-215.pdf

D. Škirpa's own manuscript cross-reference

The adjacent manuscript file, LCVA f. 648, ap. 2, b. 581, provides a separate attribution link. In his own retrospective manuscript Škirpa discusses an anti-Jewish appeal issued shortly before the German-Soviet war and expressly directs the reader to 'Dokm. LXIV.' The evidentiary function is narrow but

substantial: his own manuscript demonstrates retrospective knowledge of and linkage to the specific appeal preserved in b. 582. It is not used as proof that he typed or drafted every sentence.

Škirpa memoir pp. 136-137 / Document LXIV cross-reference: https://static-cdn.toi-media.com/blogs/uploads/2026/09/LCVA_F648_A2_B581_Skirpa_Memoir_pp136-137_Document_LXIV_CrossReference.pdf

E. The revocation question is concrete and falsifiable

The documentary chain now permits a narrower question than a general dispute over Škirpa's reputation. Document LXIV states that the historic refuge associated with Vytautas the Great was 'completely and finally revoked.' I have not identified a later act of the Republic of Lithuania that expressly identifies that LAF revocation and repudiates it.

I do not ask IHRA to infer from my search that no such act exists. The proposition is deliberately falsifiable: Lithuania can answer it by producing the act, identifying the institution, date and text, and stating whether it is treated as the Republic's explicit repudiation of the LAF declaration. If such an act is produced, the non-identification point disappears.

X. Škirpa's 1973 book supplies two direct source-use tests

A. Item 18: a first-person initiative statement

In item 18 of Škirpa's 1973 documentary survey, beginning at printed page 165, he describes an Administracijos sudarymo pasiūlymas (administrative formation proposal) given to Lt. Col. Graebe. Point 5 names Jews, together with other persons characterized as pillars of the Soviet regime, for immediate dismissal and, where necessary, arrest and accountability. Immediately after the eighth introductory point, Škirpa states retrospectively that all of those introductory points were inserted on his own initiative, without Graebe specifically asking him to do so, and explains his statehood rationale.

This statement is retrospective and must not be turned into more than it proves. Standing alone, it is not contemporaneous proof that Škirpa personally drafted every word of the 1941 proposal, and it does not establish operational responsibility for later killings. Its importance is methodological. If adverse organizational material is discounted unless personally attributable to Škirpa, then his own published first-person statement about inserting the entire eight-point package is a source that must either be weighed or expressly distinguished.

Both the 2015 determination and Report No. 9R-598 cite the 1973 volume for other propositions. A document-specific audit finds that neither cites printed pages 165-167, names item 18, identifies the administrative proposal or Graebe, or discusses the first-person initiative statement. That establishes only what the published instruments do not discuss. It does not establish what a researcher read internally.

B. The book itself declares an omission from the March 24 instructions

At printed page 171, Škirpa expressly states that he is omitting the first four sections of the March 24 instructions, including Section IV, calls those sections orientational, and proceeds directly to what he describes as the instruction's essential matters. The existence of the omission is therefore established by the book itself, not inferred from a critic's comparison. The retained portion still contains anti-Jewish language.

This does not justify a wholesale claim that the 1973 book is falsified or unusable. The correct methodological consequence is document-specific: where LGGRTC relies on the participant-edited 1973 presentation, the underlying archival version should be checked, and the report should disclose whether differences in scope or wording affected its assessment.

Public copy — Kazys Škirpa, Sukilimas Lietuvos suverenumui atstatyti (1973): <https://grantgochin.com/wp-content/uploads/2026/08/Sukilimas-Lietuvos-suverenumui-atstatyti-Kazys-Skirpa.pdf>

XI. Differential attribution and the untested rival-authenticity hypothesis

Report No. 9R-598 relies on a newspaper item in Draugas dated 25 June 1941 reporting that the latest information from Berlin said Škirpa had prohibited persecution of Jews. The report then formulates its own research question on the premise that he issued such a prohibition — asking why he prohibited persecution rather than first establishing whether the prohibition existed. No underlying prohibition order, transmission record, or identified original source is supplied in the report.

The methodological issue is comparative. Adverse LAF material is repeatedly subjected to personal-authorship or direct-attribution objections, while this favorable proposition enters through a second-hand newspaper report and is then embedded in the institution's own research question. IHRA is not asked to decide which source should win. It is asked whether the state determination is reproducible when the institution does not state a consistent attribution rule for favorable and adverse evidence.

The July 2018 reply adds a second source-method problem. LGGRTC reproduced Bronys Raila's retrospective speculation that hostile actors might have supplemented LAF texts and raised the possibility that antisemitic language had been inserted later. That possibility cannot be rejected merely because it is exculpatory; authenticity concerns should be tested. The problem is that no published provenance chain, contemporaneous parallel copy, forensic comparison, or document-by-document source history supporting the later-insertion hypothesis has been identified.

The asymmetry is therefore testable: one adverse-source challenge is answered with an authenticity hypothesis that is not publicly demonstrated, while a favorable Škirpa prohibition is accepted through a second-hand report without an underlying order. The requested remedy is production of the working file and statement of the evidentiary rule.

XII. The 1939 record adds antecedents before the Soviet occupation and before the LAF

Two peer-reviewed 2017 studies published by Vytautas Magnus University identify relevant 1939 archival material with precise Lithuanian archival locators. The underlying originals are not reproduced in this submission, so I treat these as corroborative scholarly reports and retrieval leads rather than principal primary-source findings.

Šarūnas Liekis cites a Lithuanian legation report of 14 December 1939, LCVA/LCSA f. 383, ap. 7, b. 2230, fols. 5-5a, describing a conversation between Škirpa and Ernst Woermann during the Suwałki Jewish refugee crisis. In Liekis's account, Škirpa replied that Jews were not loved in Lithuania either, said there were already too many, stated that Lithuania could not afford refuge especially for Jews, and suggested the Lublin area as an alternative destination. The same study records that Škirpa had earlier intervened, at the Lithuanian government's instruction, against Germany's forcible expulsion of Jewish refugees across the Lithuanian border. Both facts should be preserved together.

Simonas Jazavita cites a 13 March 1939 Škirpa report to Foreign Minister Juozas Urbšys, LCVA/LCSA f. 648, ap. 1, b. 39, fols. 155-157, in which Škirpa attributed approximately ninety percent of anti-Communist agitation to Jews. Jazavita also cites an August 1939 letter in which Urbšys objected to what he described as Škirpa's 'openly Nazi rhetoric.' These materials matter chronologically: they make it harder to explain the later anti-Jewish political program solely as a reaction to the Soviet occupation of June 1940.

Šarūnas Liekis, "The Suwalki Triangle. A Window into the Genocidal Future," 2017: https://static-cdn.toi-media.com/blogs/uploads/2026/09/ISSN2335-8769_2017_N_67.PG_179-189.pdf

Simonas Jazavita, "The Position of Lithuania in the Japanese-German Relationship," 2017: https://static-cdn.toi-media.com/blogs/uploads/2026/09/ISSN2335-8769_2017_N_67.PG_191-213.pdf

XIII. Finnish Foreign Ministry material adds independent contemporaneous attribution to Škirpa

The Finnish Foreign Ministry archive now supplies several distinct layers. They should not be collapsed into a single historical proposition.

A. The 23 July 1941 Škirpa memorandum

A Finnish legation file preserves a covering letter dated 23 July 1941 and a four-page memorandum transmitted by Škirpa from Berlin. The covering letter materially strengthens attribution: it presents the enclosed text as Škirpa's memorandum concerning Lithuania's current legal position and wishes. The memorandum records a German-oriented political program, including active cooperation with Germany in the reorganization of Europe, assistance to entering German troops, and a future place for Lithuania within a European order led by Germany and its allies. I use this for political alignment and provenance, not as proof that Škirpa personally authored LVIII or LXIV and not as proof of Holocaust culpability.

Finnish MFA preservation copy — Škirpa memorandum and covering letter: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/7-E-Skirpa-muistio.pdf>

B. The September 1941 Kivimäki transmission and Provisional Government record

The Finnish file also records a 23 September 1941 transmission associated with Škirpa to Finnish envoy Toivo Kivimäki. The file identifies enclosures including Provisional Government Protocol No. 35 and the 5 August 1941 memorandum to the Generalkommissar signed by Juozas Ambrazevičius and ministers. I cite this material here only to identify the preservation and transmission record. Disputed wording within the second Kivimäki transmission is expressly not relied upon in this submission and remains reserved for separate treatment.

Finnish MFA preservation copy — Lithuanian independence efforts, 1941: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/7E-Lietuan-itsenaisvysspyrkimykset-1941.pdf>

C. The 1942–1943 diplomatic note

A Finnish Legation file from Bern preserves a Lithuanian diplomatic note circulated in the 1942–1943 period to governments aligned with the United Nations. It is relevant to the broader exile-diplomatic narrative of Lithuanian sovereignty and wartime self-presentation. I do not use it as primary evidence of Škirpa's anti-Jewish program; it is included so the diplomatic source set is not selectively described.

Finnish MFA preservation copy — Lithuanian diplomatic note, 1942–1943: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/7E-Lietuan-nootti-1943.pdf>

D. Lithuania's own stated standard of acknowledgment, 1994–1995

Two later Finnish diplomatic cables provide a useful institutional comparator. The September 1994 report records Prime Minister Adolfas Šleževičius calling for an honest and open assessment of the persecution and killing of Jews in Lithuania, apologizing for Lithuanian participation, and coupling acknowledgment with a stated responsibility to bring participants in persecution and murder to justice. The March 1995 report records President Algirdas Brazauskas's apology in Israel for Lithuanians who killed, shot, drove Jews to death and robbed them, and records commitments to systematic investigation and review of disputed rehabilitation cases.

These are Finnish diplomatic reports of Lithuanian statements, not substitutes for the original Lithuanian or Knesset texts, so I do not use them as exact-quotation authority. Their relevance is institutional: by 1994–1995 Lithuania's leadership was publicly articulating a standard of explicit acknowledgment, accountability and rehabilitation review. The contemporaneous commemoration chronology is set out once, in §XIV below; it is pre-accession context rather than an IHRA membership violation.

Finnish MFA / Embassy Vilnius report, 23 September 1994: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/5C-VIL0329.pdf>

Finnish MFA / Embassy Vilnius report, 16 March 1995: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/5C-VIL0096.pdf>

XIV. Materiality: this is a live state-memory question, not an abstract historical dispute

The 2024 report was prepared for an interinstitutional state process concerning commemoration of Škirpa. The Lithuanian Jewish Community, stating that it represented thirty-two Lithuanian and foreign Jewish organizations, publicly rejected Report No. 9R-598 in August 2024. Vilnius had already renamed a street carrying Škirpa's name in 2019, and the proposed plaque generated renewed state review in 2024. I do not ask IHRA to decide the memorial outcome; the relevance is that a disputed state historical method directly informs public-memory decisions.

That is why the requested remedy is methodological rather than commemorative: disclose the source rule, expose the working record, state what was considered, correct propositions that no longer stand, and reissue the determination if its reasoning has changed.

The commemorative record predates the 2024 plaque process. Škirpa and his wife were reburied at Petrašiūnai Cemetery in Kaunas on 16 June 1995 in a state-sponsored ceremony. Contemporary reporting records Prime Minister Adolfas Šleževičius speaking on behalf of the Government; the Lithuanian Foreign Ministry later confirmed that Defence Minister Linas Linkevičius chaired the reburial commission, organized the events under a Government order, and delivered the cemetery address. In Vilnius, a municipal decision of 4 February 1998 named Kazio Škirpos Alley. On 24 July 2019 the City Council renamed it Trispalvės Alley and expressly repealed the relevant point of the 1998 naming decision.

These acts do not prove endorsement of every part of Škirpa's biography. They show why the quality of the state's historical determination has practical consequences: public authorities have repeatedly had to decide which parts of his record are honored, rejected, or left unresolved. Private replacement plaques or demonstrations are not treated here as state acts and are not necessary to this submission.

Vilnius City Municipality decision renaming Kazio Škirpos Alley and repealing the 1998 naming point:

<https://vilnius.lt/naujienos/del-trispalves-vardo-suteikimo-alejai-ir-jos-ribu>

Lithuanian MFA response confirming the Škirpa reburial commission and 16 June 1995 ceremony: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/linkevicius-answer-2018-06-img-626083531-0001.pdf>

Contemporaneous 1995 press report on the reburial ceremony: https://www.spauda.org/teviskes_ziburiai/archive/1995/1995-07-11-TEVISKES-ZIBURIAL.pdf

Lithuanian Jewish Community statement, English, 26 August 2024: <https://www.lzb.lt/en/2024/08/26/lithuanian-jewish-community-statement-on-genocide-centers-newest-report-on-kazys-skirpa/>

XV. Current domestic procedural posture: AP-29927

On 11 September 2026 I submitted a criminal-law application concerning Report No. 9R-598, registered as AP-29927. On 24 September 2026 Prosecutor Sergejus Stulginskis declined to open a pre-trial investigation in material No. M-2-01-00074-26.

The decision is relevant here for what it does and does not decide. It identifies Report No. 9R-598 as having been prepared by LGGRTC historian Dr. Alfredas Rukšėnas and signed by Director General Dr. Arūnas Bubnys. It characterizes the report as a historiographical, not legal, assessment and treats the contested passages as specialist historians' opinion. Applying the criminal threshold of Article 170², the prosecutor found insufficient objective and subjective elements to open a criminal investigation.

That disposition is not a historical validation of every proposition in Report No. 9R-598 and does not adjudicate the source-use questions presented here. It establishes a present procedural boundary: the

criminal proceeding did not test whether the report applied a consistent attribution rule, whether its omitted or differently weighted sources should have altered the analysis, or whether the report should be reissued after the 2018 transparency finding and the 2026 correction of a favorable premise. The decision was subject to appeal within seven days. I have elected not to appeal it.

Official decision: Office of the Prosecutor General, IBPS-V-2526543-26, 24 September 2026, material No. M-2-01-00074-26.

Preservation copy: https://static-cdn.toi-media.com/blogs/uploads/2026/09/Lithuania_Prosecutor_Refusal_AP-29927_AP-29972_2026-09-24.pdf

XVI. Findings stated by confidence level

Established on documents now held or publicly preserved

- LGGRTC acknowledged in the 2018 oversight record that it had taken into account favorable circumstances not stated in the published Škirpa conclusion.
- The Seimas Ombudsman found a transparency failure, found that the required clear and reasoned response was not provided, recognized the complaint regarding the Centre's officials as justified, and identified signs of systematic improper implementation of legal requirements in the Centre's handling of requests.
- The 2026 Seimas production proves that the specific March 1941 instructions and the Vytautas-related revocation document were already raised before Lithuanian institutions in the 2017 complaint.
- LGGRTC Letter No. 14R-51 used the Brazaitis 'complete exoneration' proposition inside the Škirpa file while reproducing on the same page the narrower U.S. language that the investigations had been deactivated.
- On 12 May 2026 the Ministry of Foreign Affairs acknowledged that the 'complete exoneration' formulation was legally imprecise and distinguished administrative discontinuation from judicial exoneration.
- No public reissued Škirpa determination removing or re-weighting that favorable premise has been identified as of 24 September 2026.
- Document LVIII is an LAF document dated 24 March 1941, marked strictly secret, intended for clandestine transmission, and containing both a stated objective and a numbered task to force Jews from Lithuania.
- Document LXIV is an LAF document demanding collective Jewish departure, transfer of Jewish property, permanent civic and economic exclusion, and revocation of the historic refuge associated with Vytautas the Great.
- Škirpa's own manuscript expressly cross-references the anti-Jewish appeal to Document LXIV, establishing retrospective knowledge and documentary linkage but not personal authorship of each sentence.
- Škirpa's 1973 book itself declares that the published presentation of the 24 March instructions omits Sections I-IV.
- Neither the 2015 determination nor Report No. 9R-598 publishes a discussion of item 18 / printed pp. 165-167 of the 1973 volume, although both use that volume elsewhere.
- Report No. 9R-598 relies on a favorable Draugas report of a Škirpa prohibition on persecution but does not supply an underlying prohibition order or transmission record.
- Report No. 9R-598 identifies Alfredas Rukšėnas as the historian who prepared it and carries Arūnas Bubnys in the Director General signature block; the 24 September 2026 prosecutorial decision records the same authorship-signature chain.

- On 26 August 2026 LGGRTC visibly corrected one Brazaitis 'rehabilitation' formulation on page 3058, while a separate U.S.-Department-of-Justice rehabilitation statement remained on that page and page 2969 remained unchanged.
- The 24 September 2026 AP-29927 refusal treats Report No. 9R-598 as a historiographical, not legal, assessment and specialist opinion for criminal-law purposes; it does not adjudicate the report's historical source method.

Corroborative but not principal findings

- The Liekis and Jazavita studies report relevant 1939 archival material with precise Lithuanian archival locators. The underlying originals should be obtained before those reports are promoted to primary-source findings.
- The Finnish MFA file is a direct contemporaneous Škirpa source with a covering letter that materially strengthens attribution. It is used for political alignment and provenance, not as proof of authorship of LVIII or LXIV or of Holocaust culpability.
- The b. 582 index identifies Document LV, 'Revocation of Hospitality to Jews,' as a draft. Because the primary scan is not relied upon here, the document is not characterized as an issued proclamation.
- The September 1941 Finnish file identifies Škirpa's transmission to Kivimäki and preserves Protocol No. 35 and the 5 August Provisional Government memorandum. It is used for source-set identification only; disputed wording is not relied upon.
- The 1994–1995 Finnish diplomatic reports preserve contemporaneous accounts of Lithuanian state acknowledgment, apology, accountability promises and rehabilitation review. They are used as an institutional comparator, not as exact-quotation authority.

Open, falsifiable question

- I have not identified a Lithuanian state act expressly identifying and repudiating the LAF's declared 'complete and final' revocation of the Vytautas-era refuge. This is not asserted as proof of nonexistence; Lithuania can resolve it by producing the act.

Supported institutional inference

Taken together, the record supports an institutional inference that the favorable Škirpa determination has not been made fully reproducible after notice: undisclosed favorable considerations were used; a state oversight body found a transparency defect; one favorable premise was later conceded to be legally imprecise; and Report No. 9R-598 retained three identifiable limiting propositions from the earlier determination—expulsion rather than genocide, lack of prewar knowledge of total extermination, and separation of Škirpa from the VII Fort killings by his Berlin location (2015 determination, pp. 4–6; Report No. 9R-598, pp. 5 and 7). Primary-source objections specifically raised in 2017 remain without a published source-use audit, and the institution has not stated a single attribution rule applied consistently to favorable and adverse evidence. This inference does not require a finding that any named official acted dishonestly.

XVII. Pre-registered correction and falsification conditions

- If Lithuania produces a reissued determination or dated reassessment showing how the Škirpa conclusion was re-weighted after the 12 May 2026 ministerial correction, the persistence-after-correction finding must be revised from that date.
- If LGGRTC produces the underlying prohibition order behind the 25 June 1941 Draugas item, together with provenance and transmission evidence, the criticism of that item must be narrowed or withdrawn.

- If the 2015 determination or Report No. 9R-598 is shown to discuss item 18 / printed pp. 165-167 under a different title or location, the published-source omission finding must be corrected.
- If the LGGRTC working files show that LVIII, LXIV, item 18, or contrary attribution evidence were reviewed and expressly distinguished, the issue narrows from failure to engage the source to failure to publish the reasoning.
- If competent review of the Lithuanian originals materially changes the English descriptions of LVIII, LXIV, or the memoir cross-reference, the corresponding propositions will be corrected.
- If the underlying 1939 archival originals do not support the Liekis or Jazavita descriptions, the 1939 corroborative propositions will be withdrawn.
- If the 1973 first-person statement is shown, on competent linguistic review, not to apply to all eight introductory points or not to include point 5, the item 18 attribution proposition will be withdrawn or narrowed.
- If the b. 582 index or primary scan shows that Document LV is not a draft or is materially different from the description reproduced in the 2017 complaint, the treatment of that document will be corrected.
- If Lithuania produces a dated state act expressly identifying and repudiating the LAF's revocation of the Vytautas-era refuge, the non-identification proposition is withdrawn from the date and scope of that act.
- If LGGRTC produces a public instrument showing that every Brazaitis rehabilitation/exoneration formulation relevant to the Škirpa premise was fully withdrawn before this filing, the partial-correction finding must be revised.
- If the AP-29927 decision is reversed or a later Lithuanian proceeding substantively adjudicates the source-method questions in Report No. 9R-598, the description of the current domestic procedural boundary must be updated.
- If IHRA determines, on a reasoned record, that the documented Škirpa/LGGRTC conduct is consistent with the cited membership commitments, the membership-compliance allegation must be narrowed or withdrawn to the extent of that determination.

XVIII. Requested IHRA process

Because the public membership procedure explains admission by consensus but does not publish a removal procedure, I ask IHRA to proceed through graduated measures first, to the extent its rules permit, and to reserve any membership-status consequence until after a defined cure process has failed.

1. Register and preserve this revised submission with the May 28 petition, the August 19 Škirpa filing, and the September 24 Lithuanian-delegation transmission request. Treat this document as the current evidentiary statement of the Škirpa matter.
2. Commission or invite an expert-body assessment of the Škirpa/LGGRTC record, referring it to the Academic Working Group, the Committee on Antisemitism and Holocaust Denial, and the Committee on the Holocaust, Genocide, and Crimes Against Humanity, or to whichever expert bodies the IHRA Chair and Secretary General consider appropriate.
3. Request a document-specific written response from the Republic of Lithuania through the Chair or Secretary General, addressing the questions below rather than a general statement about Škirpa's reputation, and place the compliance question on an appropriate Plenary agenda if IHRA's rules permit.
4. Encourage preservation and production of the relevant historical working files and source-use record, recording any non-production only as an evidentiary boundary and not as proof of intent.

5. Invite Lithuania to state whether the 2015 and 2024 Škirpa determinations remain in force without qualification after the 2018 Ombudsman finding and the 12 May 2026 ministerial correction, and if so to publish the evidentiary basis on which they now rest.
6. Invite Lithuania to identify the exact archival or published versions of LV, LVIII, LXIV and the 1973 source passages that were consulted in 2015 and 2024, and to explain the attribution rule applied to each.
7. Invite Lithuania to identify any state act that expressly repudiates the LAF's revocation of the Vytautas-era refuge, or state that no such act has been identified in the responding institutions' records.
8. Open a formal membership-compliance review, or identify the IHRA procedure that performs the equivalent function, measuring the documented conduct against the Stockholm Declaration, the 2020 Ministerial Declaration, the Working Definition, and the Statement on Rehabilitation.
9. Publish or communicate a reasoned compliance determination distinguishing proven facts, disputed historical propositions, methodological deficiencies, and corrective steps. If IHRA finds material non-compliance, define objective corrective benchmarks and a cure period.
10. Only if IHRA finds material non-compliance and the defined cure is refused or fails, identify what membership-status consequences are available under IHRA's governing procedures.

XIX. Document-specific questions for Lithuania

- Has LGGRTC formally reassessed the Škirpa determination after the Foreign Ministry's 12 May 2026 acknowledgment that the 'complete exoneration' premise was legally imprecise? If yes, identify and produce the reassessment.
- Did the 2015 determination or Report No. 9R-598 consult item 18 / printed pp. 165-167 of Škirpa's 1973 volume? If yes, how were point 5 and the first-person initiative statement weighed? If not, state that fact.
- What evidentiary rule did LGGRTC apply in 2015 and 2024 when deciding whether an LAF text could be attributed to Škirpa? Was the same rule applied to favorable evidence such as the Draugas prohibition report?
- What is the original source, transmission chain, and documentary provenance of the alleged Škirpa prohibition on persecution reported in Draugas on 25 June 1941?
- How did the Centre treat Document LVIII and Document LV ('Revocation of Hospitality to the Jews'), the two documents specifically raised in the 2017 complaint, when preparing Report No. 9R-598; and how, if at all, did it separately treat Document LXIV once that document was identified in the later archival chain?
- Did the Centre consult Document LV, 'Svetingumo atšaukimas žydams'? If so, did it treat it as a draft, an issued text, or another category, and on what provenance evidence?
- What internal research file, instructions, drafts, source lists, reviewer comments, and commission correspondence underlie Report No. 9R-598?
- Did LGGRTC withdraw or qualify its reliance on the asserted American exoneration of Brazaitis and on Škirpa's decades of unaccused residence in the United States? If so, identify the instrument and date.
- What corrective action followed the Seimas Ombudsman's 2018 transparency finding and recommendation that I receive a clear and reasoned response to all questions raised?
- What published provenance test, parallel copy, forensic comparison, or document-by-document source history supports the possible later-insertion hypothesis advanced in the July 2018 reply?

- Which exact edition or scan of Škirpa's 1973 book was used in 2015 and 2024, and did the researchers compare its abbreviated presentation of the March 24 instructions with the archival version in b. 582?
- Has LGGRTC considered the 23 July 1941 Škirpa memorandum preserved in the Finnish Foreign Ministry files? If so, how was its direct evidence of Škirpa's German-oriented political program weighed?
- Is there a post-1990 act of the Republic of Lithuania that expressly identifies and repudiates the LAF's declaration that the Vytautas-era refuge for Jews was 'completely and finally revoked'? If yes, identify the institution, date and text.
- After the visible 26 August 2026 correction to page 3058, why did the separate Department-of-Justice rehabilitation statement remain on that page and why did page 2969 remain unchanged? Did LGGRTC reassess the Škirpa determination after that correction?
- What role did Alfredas Rukšėnas and Arūnas Bubnys respectively have in drafting, review, approval and publication of Report No. 9R-598? This question seeks the institutional workflow only and does not presume individual intent.
- Did LGGRTC consult the Finnish MFA materials now publicly preserved, including the 23 July 1941 Škirpa memorandum, the September 1941 transmission record, or the 1994–1995 acknowledgment and apology cables? If so, how were they treated?

XX. Positionality and disclosure

I am the complainant whose 2017 submissions form part of the official Seimas file, the petitioner in the IHRA sequence beginning on 28 May 2026, and a litigant in related Lithuanian proceedings. I am not a neutral observer and do not present myself as one. Advocacy writings by me are used here only to establish notice, chronology, or the existence of a public record; the principal factual findings are tied to state records, primary archival documents, or identified scholarly sources.

I am also a doctoral candidate in Holocaust and Genocide Studies at Gratz College. If this matter is referred to an IHRA expert body whose chair or member has an institutional connection to Gratz, I request whatever recusal, reassignment, or disclosure step IHRA considers appropriate. I seek no favorable consideration from that relationship.

I applied for the post of Director General of LGGRTC in February 2026 and again in July 2026 and was not selected. I disclose that interest here.

XXI. Principal documentary source map

Original IHRA petition, 28 May 2026: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/IHRA-Petition-Gochin-5-28-26.pdf>

Original Škirpa supplemental submission, 19 August 2026: https://static-cdn.toi-media.com/blogs/uploads/2026/08/IHRA_Supplemental_Submission_Skirpa_Determination_2026-08-19.pdf

Formal request to Lithuania's IHRA delegation, 24 September 2026: https://static-cdn.toi-media.com/blogs/uploads/2026/09/IHRA_Lithuania_Formal_Request_BILINGUAL_LT_AUTHENTIC_2026-09-24_signed.pdf

Seimas Human Rights Committee response package, 22-23 September 2026: https://static-cdn.toi-media.com/blogs/uploads/2026/09/Seimas_HRC_Response_2026-09-22_Gochin_with_English_Translation.pdf

MFA reply to Representative Sherman, 12 May 2026: <https://static-cdn.toi-media.com/blogs/uploads/2026/06/Letter-to-Rep.-Sherman.pdf>

LGGRTC 2015 Škirpa determination: https://www.genocid.lt/UserFiles/File/Pazymos/201510_skirpa_pazyma01.pdf

LGGRTC Report No. 9R-598, preservation copy: https://static-cdn.toi-media.com/blogs/uploads/2026/07/20240808_skirpa_pazyma.pdf

LGGRTC 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>

LGGRTC Letter No. 14R-51, 11 July 2018: https://static-cdn.toi-media.com/blogs/uploads/2026/05/GC_reply_Skirpa_20180711-1.pdf

Škirpa 1973 documentary survey: <https://grantgochin.com/wp-content/uploads/2026/08/Sukilimas-Lietuvos-suverenumui-atstatyti-Kazys-Skirpa.pdf>

Document LVIII, 24 March 1941, public copy: https://grantgochin.com/wp-content/uploads/2026/09/LCVA_F648_A2_B582_Document_LVIII_1941-03-24_Strictly_Secret_Instructions.pdf

Document LXIV, fols. 213-215, public copy: https://grantgochin.com/wp-content/uploads/2026/09/LCVA_F648_A2_B582_Document_LXIV_LAF_Anti-Jewish_Appeal_Fols_213-215.pdf

Škirpa manuscript / LXIV cross-reference: https://static-cdn.toi-media.com/blogs/uploads/2026/09/LCVA_F648_A2_B581_Skirpa_Memoir_pp136-137_Document_LXIV_CrossReference.pdf

Liekis 2017: https://static-cdn.toi-media.com/blogs/uploads/2026/09/ISSN2335-8769_2017_N_67.PG_179-189.pdf

Jazavita 2017: https://static-cdn.toi-media.com/blogs/uploads/2026/09/ISSN2335-8769_2017_N_67.PG_191-213.pdf

Finnish MFA — Škirpa memorandum and covering letter: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/7-E-Skirpa-muistio.pdf>

Finnish MFA — Lithuanian independence efforts, 1941: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/7E-Lietuan-itsenaisvyspyrkimykset-1941.pdf>

Lithuanian Jewish Community statement on Report No. 9R-598: <https://www.lzb.lt/en/2024/08/26/lithuanian-jewish-community-statement-on-genocide-centers-newest-report-on-kazys-skirpa/>

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

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

IHRA 2019 statement concerning LGGRTC: <https://holocaustremembrance.com/statements/statement-center-study-genocide-resistance-lithuania>

LGGRTC page 3058 (26 August 2026 correction marker visible): <https://www.genocid.lt/centras/lt/3058/a/>

LGGRTC page 2969: <https://www.genocid.lt/centras/lt/2969/a/>

Annotated August 2026 correction comparison: https://static-cdn.toi-media.com/blogs/uploads/2026/08/LGGRTC_Annotated_Exhibit_2026-08-30.png

Finnish MFA — Lithuanian diplomatic note 1942–1943: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/7E-Lietuan-nootti-1943.pdf>

Finnish MFA / Embassy Vilnius — Šleževičius report, 1994: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/5C-VIL0329.pdf>

Finnish MFA / Embassy Vilnius — Brazauskas report, 1995: <https://static-cdn.toi-media.com/blogs/uploads/2026/09/5C-VIL0096.pdf>

Vilnius City Municipality — 2019 renaming act and repeal of 1998 naming point: <https://vilnius.lt/naujienos/del-trispalves-vardo-suteikimo-alejai-ir-jos-ribu>

Lithuanian MFA response confirming the Škirpa reburial commission and 16 June 1995 ceremony: <https://static-cdn.toi-media.com/blogs/uploads/2026/05/linkevicius-answer-2018-06-img-626083531-0001.pdf>

Contemporaneous 1995 press report on the reburial ceremony: https://www.spauda.org/teviskes_ziburiai/archive/1995/1995-07-11-TEVISKES-ZIBURIAI.pdf

Office of the Prosecutor General, decision IBPS-V-2526543-26, 24 September 2026, material No. M-2-01-00074-26: https://static-cdn.toi-media.com/blogs/uploads/2026/09/Lithuania_Prosecutor_Refusal_AP-29927_AP-29972_2026-09-24.pdf

IHRA Member Countries: <https://holocaustremembrance.com/who-we-are/member-countries>

IHRA Membership and Application Procedure: <https://holocaustremembrance.com/who-we-are/member-countries/membership-and-application-procedure>

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

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

IHRA recommendations on recognizing and countering Holocaust distortion: <https://www.holocaustremembrance.com/wp-content/uploads/2023/08/Recognizing-and-Countering-Holocaust-Distortion-Recommendations-%E2%80%93-IHRA.pdf>

Current LGGRTC statute (e-Seimas): <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.40706/asr>

IHRA Lithuania country page (joined 2002): <https://holocaustremembrance.com/countries/lithuania>

IHRA, Understanding Holocaust Distortion: Contexts, Influences and Examples: <https://www.holocaustremembrance.com/wp-content/uploads/2023/09/Understanding-Holocaust-Distortion-Contexts-Influences-and-Examples-IHRA.pdf>

Respectfully submitted,
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24 September 2026