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G. Gochin

Baghdad, 04 October 2026
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Formal request for removal of LGGRTC from PRISMA and for interim safeguards

Project 101296606 | 5 October 2026 | Citizen of the Republic of Lithuania

To Alphabet Formation (identified as Alfabet Formation on Osijek's partner page), PRISMA coordinator, and the competent consortium decision-making body. For referral to the competent EU granting authority. [2,14]

Copies: the competent EU granting authority for project 101296606; the European Commission Coordinator on combating antisemitism and fostering Jewish life; the Lithuanian Jewish (Litvak) Community; Vazmozhnosti bez granitsi; Jewish Community of Osijek; Center of Jewish Cultural Heritage Synagogue Maribor; Ambassador Shelly Hugler Livne, Embassy of Israel in Lithuania; Emma Locatelli and the United States Embassy in Vilnius.

I request the removal of the Lithuanian Genocide and Resistance Research Centre (LGGRTC) from PRISMA and, to the extent permitted by the governing arrangements, immediate suspension of its authority to supply, approve or teach historical content while the removal request is decided. The grounds are documented historical distortion and failure to examine the primary judicial source invoked to exonerate a Nazi occupation official in an argument defending Jonas Noreika. The requested decision should follow the applicable grant and consortium procedures.

My family came from Šiauliai, where the occupation administration operated. This matter is intensely personal. The evidence I submit, however, is documentary: Lithuania's own statute, parliamentary record, official historical determinations and signed institutional admission. A programme opposing Holocaust distortion must assess a partner against those records, rather than accept its state status as a substitute for verification.

1. PRISMA's standard and the partner's admitted practice

LGGRTC's own project description identifies PRISMA as running from 1 July 2026 to 30 June 2028. It describes WP3 as training participants to recognize distortion and develop fact-based narratives, and WP5 as cultivating critical use of sources and responsible historical journalism. Osijek's partner announcement independently identifies the consortium and its Belgian coordinator. Osijek's description expressly includes the roles of victims, bystanders, collaborators and rescuers, and resistance to Holocaust revisionism. The treatment of collaborators is therefore part of the project's published design. These standards require assessment of the Centre's documented exculpatory treatment of Noreika. [1-2]

On 2 October 2026, LGGRTC registered response No. 55R-951, signed by Acting Director Arūnas Bubnys. It acknowledged that it had not examined the 1970 Lübeck judgment and that its statement that Ewald Bub was completely acquitted was probably

legally inaccurate. It nonetheless maintained that its essential statements were accurate. That admission concerns the source underlying a categorical historical claim first advanced in 2019, not merely a new archive that remained to be investigated. [3-4]

2. The exoneration narrative fails on the documents

The 17 December 2019 memorandum and the replies of 3 and 11 February 2020 invoked supposed German exoneration of Hans Gewecke and Ewald Bub in the Centre's defense of Noreika. The 3 February Cvirka reply also asserted release following Allied interrogation in 1945 and described Noreika as transmitting their orders. The attached study supplies the exact texts, repetition series and contrary records. [4]

The published Lübeck judgment has three distinct components. It did not establish Bub's co-perpetration of Mord; its reasons established his knowing, intentional and unlawful assistance in Totschlag; and proceedings against him were discontinued because that offense was time-barred. Bub was not convicted. Neither discontinuance nor the failure of the murder allegation constitutes complete historical exoneration. Gewecke was convicted and sentenced to four years and six months. An account that presents these outcomes as rejection of Holocaust accusations generally converts a limited criminal disposition into an unwarranted innocence narrative. [4]

Nor can the 1943 proceeding exonerate Noreika's separate 1941 acts. LGGRTC's own October 2015 memorandum records his 22 August 1941 ghettoization instruction and the 10 September 1941 directive governing liquidation of movable Jewish property, LCVA R-1099-1-1, leaf 239. Bub arrived in Šiauliai only in October 1942. The Centre therefore possessed documentary evidence of Noreika's administrative participation that the Bub court-outcome alibi could not erase. That alibi fails twice: it misstates Bub's disposition and treats a proceeding about a 1943 killing as if it adjudicated Noreika's 1941 orders. The International Commission's Holocaust subcommission challenged the Centre's Noreika interpretation in its 11 April 2019 statement. [4-6]

Two further public documents reinforce the need for independent review. Lübeck judgment p. 350 records Gewecke's 1948 Bielefeld sentence of two years, credited against internment, and a 20,000-Reichsmark fine; the reasons considered his Šiauliai activity without identifying individual incidents. This was not a conviction for a particular Šiauliai killing. Bubnys's own English chapter in the 2002 Šiauliai volume, p. 231, attributes the seizure and shooting of 72 Jews in December 1941 to orders from Gewecke and the German Security Police and SD head. Bubnys also contributed to the volume containing Lipshitz's adverse account of Bub. Co-contribution does not prove he read that account; it does require an explanation of institutional source selection. [4,10-11]

3. Lithuania's own legal and official standards

Law XIV-2960 of 18 July 2024 restated the Centre's governing Law VIII-238. Article 3 defines its purpose through scientific and applied research; Article 4 assigns historical research and restoration of historical justice. The preamble acknowledges collaboration with occupation regimes and the need for comprehensive analysis of its social effects. These are Lithuania's enacted institutional standards, not requirements invented by an external critic. The preamble expressly calls for investigation by "renkant ir analizuojant visą Lietuvioje ir už jos ribų esančią archyvinę ir istorinę medžiagą" and states that research and establishing historical truth "negali būti stabdomi jokia dingstimi". In English, these provisions require collecting and analysing archival and historical material at home and abroad, and permit no pretext for halting research or establishing historical truth. A German judgment falls squarely within the material held abroad. The admitted failure to examine that judgment, with non-digitization offered as the explanation, conflicts with this statutory research standard. This is an accountability argument, not a claim that a court has adjudicated a statutory breach. [7]

The official Seimas voting record confirms adoption without amendments on 24 September 2026 of the resolution titled Dėl Holokausto pradžios Lietuvoje 85-ųjų metinių, introduced as project XVP-1663(2), by 110 votes to none, with no abstentions. This request does not attribute a finding on Bub or Noreika to that resolution. Its principal legal benchmark is the Centre's statute quoted above. [8]

The IHRA's non-binding definition identifies intentional efforts to excuse or minimize the Holocaust's principal elements, including collaborators and Nazi Germany's allies, as distortion. The European Commission's 2021-2030 antisemitism strategy expressly commits to promoting that definition for education and awareness-raising. The conversion of a limited court disposition into an alibi for Noreika's documented 1941 orders should be assessed against this standard. This is a historical-integrity yardstick, not an assertion that the definition itself establishes a criminal offense. [12-13]

I conclude that the documented institutional conduct constitutes clear and apparent historical fraud and deliberate rewriting of Holocaust history: false judicial authority was used for exculpation, the claim was repeatedly disseminated, and an essential defense was maintained after the Centre admitted it had not examined the judgment. This is my evidence-based assessment of institutional conduct, not a criminal conviction or a claim that identical subjective intent has been proved for every employee. I am not a lawyer; the remedy requested here is partner removal and protection of historical integrity.

4. Decisions and safeguards requested

1. Initiate the procedure to remove LGGRTC as a PRISMA partner. Identify the competent decision-maker, the applicable grant and consortium provisions, and any required EU approval. If Alphabet Formation cannot decide removal alone, refer this request to the body that can and confirm that referral.

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2. Pending a decision, suspend LGGRTC's historical-content authorship, review, sign-off and teaching roles to the extent permitted by the governing arrangements. Quarantine any material relying on the disputed exoneration claims. Confirm whether such claims have entered any project draft or deliverable; their incorporation is not assumed.
3. Commission an independent primary-source review of the statements identified above. Require the Centre to identify which primary and secondary sources supported each disputed formulation, who drafted and approved it, when the judgment was first obtained or examined, and what correction followed documentary notice. Reviewers must be independent of their authors and approvers, have access to the published judgment and relevant records, and possess authority to reject content. Give LGGRTC an opportunity to respond to the specific discrepancies, with its response assessed independently. Bubnys signed 55R-951, contributed the 2002 chapter under examination and heads the partner institution; any response must be reviewed by a person independent of him and the authors and approvers of the disputed claims.
4. Disclose or identify the grant agreement, application and amendments; consortium arrangements; detailed budget and LGGRTC allocation; partner responsibilities; work-package leadership; methodology; quality-control provisions; deliverables and evaluation criteria. Identify any independent historical-verification mechanism, its qualifications, conflicts rules, source access and correction authority. Supply non-confidential portions and identify the basis for withheld material.
5. Preserve and disclose partner-selection and due-diligence records: who assessed LGGRTC, what sources were examined, and whether the 2019 Commission criticism, the Centre's published determinations and the 2026 admission were considered. Participation does not alone prove that no due diligence occurred. The present evidence requires you to demonstrate what due diligence was undertaken and what corrective action follows this notice. State whether, when and how LGGRTC informed the coordinator or consortium of its 2 October 2026 admission and the pending complaints concerning its historical determinations; supply any relevant notifications. Absence of notification must be assessed against the applicable arrangements, rather than assumed to establish a contractual breach.
6. Confirm that no historical content involving the Centre's disputed findings is published without substantive verification independent of the Centre, and that participation of the Lithuanian Jewish (Litvak) Community is not presented as endorsement of such content. Its participation must operate as a safeguard for historical integrity, with meaningful scope to challenge and reject unsupported content.
7. Audit existing drafts and outputs, preserve versions, record corrections and notify affected partners and users where necessary. If removal is refused, provide a reasoned response to each documented discrepancy and explain why the remaining safeguards make continued participation consistent with PRISMA's anti-distortion purpose.
8. Notify the granting authority of this documented concern and confirm in writing the date, recipient and reference of that notification. Identify the funding programme, call,

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granting authority and project officer from the executed agreement; supply its applicable information-obligation provisions and explain how they are being fulfilled. If removal or suspension requires authority approval, request that approval. The project number alone is not treated here as proof that EACEA is the granting authority.

Please acknowledge receipt, identify a reference and responsible official, and provide a timetable for the decision. I request acknowledgment within seven calendar days and a substantive response or confirmed decision timetable within thirty calendar days. These are requested response periods, not asserted statutory deadlines.

5. Evidence supplied and existing proceedings

This request is a new consortium-accountability action, not a duplicate of the PRISMA records request already dispatched to LGGRTC on 4 October 2026. The signed interim LGGRTC submission, with the complete bilingual partial historical study, is supplied as Annex A and is publicly linked below. That study is partial and will be supplemented. It does not depend on a proposed witness list to establish Noreika's crimes, and this request does not assert that Antonina Noreika testified for Bub. [9]

The SPR-87 reconsideration request is an existing separate proceeding, not an adjudication supporting this request. No Lithuanian court or prosecutor is represented here as having found LGGRTC guilty of fraud. The consortium is asked to decide fitness for this particular project on the documented record now put before it.

Yours sincerely, Grant Arthur Gochin
To be signed with a qualified electronic signature.

Sources and public documents

[1] LGGRTC PRISMA description, project 101296606, WP3 and WP5

<https://www.genocid.lt/centras/lt/4969/a/>

[2] Jewish Community of Osijek, consortium and coordinator, 13 August 2026

<https://www.zo-osijek.hr/projekt-prisma/>

[3] LGGRTC No. 55R-951, registered 2 October 2026, pp. 1-2

https://static-cdn.toi-media.com/blogs/uploads/2026/10/LGGRTC_55R-951_2026-10-02.pdf

[4] LGGRTC December 2019 and February 2020 documents; full analysis and source links

https://static-cdn.toi-media.com/blogs/uploads/2026/10/Bub_Partial_Historical_Study_EN_LT.pdf

[5] LGGRTC October 2015 Noreika memorandum, p. 5

https://grantgochin.com/wp-content/uploads/2015/11/201510_noreika_pazyma01.pdf

[6] International Commission Holocaust subcommission statement, 11 April 2019

<https://www.komisija.lt/wp-content/uploads/2019/04/Statement-J.-Noreika-04-11.pdf>

[7] Law XIV-2960, 18 July 2024, new wording of Law VIII-238, Articles 3-4 and preamble

https://e-seimas.lrs.lt/rs/actualaedition/TAIS.40706/VbzHpIiIht/format/ISO_PDF/

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[8] Seimas official adoption vote, XVP-1663(2), 24 September 2026

https://www.lrs.lt/sip/portal.show?p_a=sale_klaus_stad&p_k=2&p_kl_stad_id=-103879&p_moment=20260924&p_r=35727

[9] Annex A: signed interim LGGRTC submission dated 5 October 2026, dispatched 4 October 2026 (Pacific time)

https://static-cdn.toi-media.com/blogs/uploads/2026/10/LGGRTC_Submission_With_Supplement_EN_LT_QES-signed.pdf

[10] Bubnys chapter, English p. 231, public scan of 2002 volume

<https://silviafoticom.wordpress.com/wp-content/uploads/2019/02/thesiauliaighetto-listsofprisoners-excerpts.pdf>

[11] 2002 volume contents catalogue

<https://www.lituanistika.lt/content/76100>

[12] IHRA Working Definition of Holocaust Denial and Distortion

<https://holocaustremembrance.com/resources/working-definitions-charters/working-definition-holocaust-denial-and-distortion>

[13] European Commission, COM(2021)615, section on Holocaust denial and distortion

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2021%3A615%3AFIN>

[14] Coordinator's own identity and Belgian registration 0651796151

<https://alphabetformation.org/>