

Vilnius Precinct Prosecutor's Office

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Suspect suspected of the commission of a criminal act:

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Address: Didžioji street no. 17/1, Vilnius

Suspect suspected of the commission of a criminal act:

Teresė Birutė Burauskaitė, general director, State budgetary enterprise the Center for the Study of the Genocide and Resistance of Residents of Lithuania

STATEMENT

**FOR INITIATING A PRE-TRIAL INVESTIGATION ACCORDING TO ARTICLE 170² OF
THE CRIMINAL CODE**

October 8, 2018, Vilnius

I. FACTUAL CIRCUMSTANCES

The plaintiff and a group of Lithuanian historians and intellectuals sent a request to the mayor of Vilnius to remove a plaque commemorating Jonas Noreika, aka General Storm, located on the wall of the Vrublevskis library of the Lithuanian Academy of Sciences. The request was based on the memoirs of A. Pakalniškis, the former secretary of the Plungė *kommandatura* who said that Jonas Noreika as head of the Telšiai branch of the Lithuanian Activist Front issued oral orders in July of 1941 to shoot all the Jews locked up and imprisoned in a synagogue in Plungė. The request was also

based on the fact there survive orders signed by Jonas Noreika for isolating Jews in ghettos and seizing their property.

The city municipality asked the Center for the Study of the Genocide and Resistance of Residents of Lithuania (hereinafter Center) to present its finding on Jonas Noreika's participation in the events of the Holocaust.

In July of 2015 the Center presented the mayor of Vilnius a finding defending and vindicating Jonas Noreika. Center historian Alfredas Rukšėnas authored the finding and it was signed by Center director Birutė Burauskaitė. In October of 2015 the Center wrote another finding defending Jonas Noreika which it published on its internet page and sent to the Government chancellor, the mayor of Vilnius and the director of the Vrublevskiai library (examination of the text of the findings in sections 2 and 6).

There also appeared in 2016 in the magazine the Center publishes a 26-page article by Alfredas Rukšėnas portraying Noreika as a protector of Jews who knew nothing about and had no genocidal plans. Alfredas Rukšėnas talks only of Noreika's actions regarding property seizure, creating a neologism to characterize these actions, "economic genocide," thus attempting to lessen the gravity of Noreika's crimes.

It should be noted that the Center said in the finding it published in October of 2015 that it had performed additional research, but that the information presented didn't differ substantially from that which the Center had back in 2014 and which had been sent in a letter to the Supreme Police Commission dated March 27, 2014. ¹

The plaintiff initiated research of documents at the Lithuanian archives which turned up the existence of a large number of official documents by Jonas Noreika as well as documents connected with the Žemaitijan Lithuanian Activist Front group he commanded, documents which Center historian Alfredas Rukšėnas and director Teresė Birutė Burauskaitė omitted, evidence which they hid from the public testifying to rather strong culpability by Jonas Noreika in the Holocaust in Žemaitija [the western half of Lithuania]. By these acts, the Center consciously and intentionally performed the criminal actions defined as Holocaust denial in article 170, section 2 of the Lithuanian criminal code, i.e., it publicly denied war crimes and trivialized them, and it did so in an obnoxious manner which disturbed the public peace.

We hereby inform you that the plaintiff went earlier to the Vilnius Precinct Prosecutor's Office for the initiation of a pre-trial investigation, but that office declined, arguing the facts explained by the plaintiff in his complaint and the matter of the complaint were too broad; therefore the plaintiff refined his complaint explaining and discussing in detail the episodes of criminal actions, discussing the legal norms regulating the definition of these criminal acts and presenting the jurisprudence of the courts in applying these legal norms.

¹ <https://dg.lapas.info/irasas/kokia-informacija-apie-holokausto-dalyviu-sarasa-oficialiai-yra-pateikes-genocido-tyrimo-centras/>

II. FACTS REVEALED AND DOCUMENTS DISCOVERED DURING RESEARCH

In 2018 the plaintiff initiated independent research of archive documents located at the Lithuanian Central State Archive and the Lithuanian Special Archive. Nazi crimes researchers Evaldas Balčiūnas and Andrius Kulikauskas performed this research. The documents discovered and the connections made by the historians with known and published documents (including the comprehensive diary of events by Lithuanian Nationalist Party secretary Zenonas Blynas published in 2010) testify to the fact the Center in 2015 actively disinformed and misled the public and government officials regarding Jonas Noreika's connections with the Holocaust in Žemaitija and Šiauliai. The documents found demonstrate Jonas Noreika was in command of the Telšiai LAF, an organized grouping which was the highest authority in Žemaitija in the summer of 1941. Members of the Telšiai LAF occupied the most powerful posts in law enforcement and civilian institutions and also set up and led independent self-defense units (TDA, LAF, "white arm-banders") who committed the mass murder of Jews of Plungė and Telšiai. The documents show the headquarters/command center of the Telšiai LAF was located in the same building as the **Lithuanian** *kommandatura*, that the commander of the Telšiai LAF issued and confirmed permits for firearms (for LAF and TDA members), that he held courts martial, considered pleas for clemency and carried out executions. The Telšiai LAF published its own official newspaper called *Žemaičių žemė* [Land of the Žemaitijans] which openly published anti-Semitic statements and calls for doing away with Jews. The press, the legislative power and the executive power were concentrated in the hands of one organized group, the Telšiai LAF. Jonas Noreika was in charge and in command of this group. Documents and press items from the summer of 1941 say nothing about any Germans then in Žemaitija, and A. Pakalniškis in his memoirs speaks only of a few Germans who were left behind as the front advanced, who took part in executions and who called themselves sadism tourists.

1. The historians determined that the *Žemaičių žemė* published by and circulars distributed by the LAF encouraged and called for the extermination of the Jewish people in Žemaitija in the summer of 1941, and that city celebrations were organized in conjunction with the mass murder operations where speeches glorifying the labor of the Lithuanian nation, Nazi Germany and Adolf Hitler were given. These events took place in the jurisdiction of Telšiai LAF commander Jonas Noreika under his leadership and with his active participation.

The *Žemaičių žemė* newspaper, whose front-page motto announced it was "the newspaper of the Lithuanian Activist Front," had only a brief existence from July till September of 1941, publishing at least 6 issues, all of anti-Semitic content, all of them calling for getting rid of the Jews. (Issue no. 5 of *Žemaičių žemė* is appended.)

2. The historians discovered in an archive a blank form from 1941 for a permit to carry a firearm which was issued by the Telšiai *kommandatura* to "Nacionalzocalist" party members. The permit is bilingual in Lithuanian and German. This documents gives a good indication the LAF insurgents in Žemaitija essentially were operating independently, without the Nazis' knowledge, and were supplying themselves with weapons and permits for carrying them. That is, civilians organized in

paramilitary groups, e.g., LAF fighters and self-defense battalion "soldiers," were being issued these permits for carrying firearms, rather than law-enforcement establishment public servants. (appended)

3. The historians discovered Noreika's order of July 25, 1941, to LAF command centers forbidding them from carrying out death sentences at their own discretion (Lithuanian Central State Archive LCVA-f1075-a2-b6-135, appended). It should be noted this order was only issued after a visit by Šiauliai Prosecutor's Office attorney M. Krygeris. In his book Krygeris indicated the Telšiai LAF was holding a large number of prisoners which he suggested they release before the Germans took them over into their control (excerpt appended).

The historians also discovered a document in which the court martial of the LAF command headquarters rejected pleas for clemency by Telšiai prison guards (LCVA-fR1441-a2-b10) (appended).

The facts confirm the Telšiai LAF was an armed, self-organized structure which carried out persecutions of people, courts martial and summary verdicts. This organization was led by Jonas Noreika who, as we have seen, could issue orders to his men not to kill, and therefore was also able to give orders to the contrary.

4. The historians found archival documents which show Jonas Noreika, executing his duties as head of the Šiauliai district, was in charge of organizing the use of Jews as slave labor, set guards for this purpose, supplied guards weapons and permits for weapons and organized taking Jews from and returning them to the ghetto. A documented case has been found on the extension of the railroad which confirms Jonas Noreika personally took private orders for supplying Jewish workers (LCVA FR 1099 a-1-b2) (appended).

There is a letter from Noreika dated November 5, 1941, to the Šiauliai municipality which indicates the municipality was missing money for the Jewish labor Noreika sent to the railroad, and Jonas Noreika told the municipality to direct their attention to the Railroad Board, the entity which had ordered the Jewish slave labor (LCVA-fR-1099-a1-b2- 1504) (appended).

5. The historians discovered Jonas Noreika's orders for the removal of Jewish residents from Gruzdžiai and his permission granted to the burgermeister of Joniškis to retain at the latter's disposal dentistry equipment for up to two months (appended). The document confirms that Noreika as head of the Šiauliai district decided the fate of people at his discretion, which Jew would live and for how long (in this case up to two months).

6. There exists a certificate dated August 24, 1942, and signed by the head and the accountant of the Šiauliai district which confirms soldiers of the Šiauliai military district command of the Lithuanian Self-Defense Battalions received payments of salaries worth 53,350.03 rubles from the Šiauliai district head in the period from September 20 to November 1, 1941 (LCVA-fR-1099-a2-b2-1133) (appended). For comparison, the surviving documents show Noreika as head of the Šiauliai district received a monthly payment of 1,000 rubles, while police officers received from 250 to 330 rubles.

This confirms that the head of the Šiauliai district (Jonas Noreika) paid the salaries of the Self-Defense Battalion for the period during which mass murder operations were carried out against Jews in the Šiauliai district (Žagarė ghetto, October 2, 1941). Historians say the 14th battalion which operated in the Šiauliai military district was comprised of brigades of soldiers from the Telšiai LAF. Jonas Noreika was the commander of the Telšiai LAF.

The facts discovered during this research give strong foundation for saying that in the Telšiai district in 1941, a large-scale propaganda campaign against the Jews was being carried out, and that the extermination of the Jews was justified and incited in public statements by and in the press published by the LAF leadership, based on the argument the Lithuanian nation must unite and cleanse itself of this undesirable element. It follows that the Telšiai LAF and its commander Jonas Noreika are subject to the suspicion they contributed to and possibly organized the mass murder of at least 1,800 Jews from Plungė (July 12 and 13, 1941) and 800 Jews from Telšiai (July 20 and 21, 1941) and the theft of the property of these murdered Jews.

Silvia Foti, Jonas Noreika's granddaughter, confirms the authenticity of this historical research and the facts it has uncovered. In the appended document, she calls the suppression of Jonas Noreika's role as commander of the Lithuanian Activist Front and as a Holocaust perpetrator one of the greatest conspiracies in Lithuania in the last century.

III. EPISODES OF CRIMINAL ACTIONS

The Center in its findings on the activities of Jonas Noreika emphasizes the exhaustiveness of its research and published materials, thus conveying the impression of reliability and comprehensiveness. It claims::

"The Center's historians investigated from all sides Jonas Noreika's actions during the period of German and Soviet occupation" (October, 2015, finding);

"Repeated investigations by the Center's historians failed to confirm ... the claims made in the memoirs of Antanas Pakalniškis alleging Noreika was a participant in the operation to exterminate the Jews." (October, 2015, finding);

"Center historians based on analysis of probably all available sources at the current time determines that the facts concerning the aforementioned events negate the claims made in A. Pakalniškis's memoirs." (October, 2015, finding);

"[The Center] investigated Jonas Noreika's activities using all available sources of information." (reply to the office of parliamentary ombudsman and the plaintiff dated February 26, 2018);

"The abovementioned results of the research allow us to say the Nazi occupational regime did not succeed in drawing Jonas Noreika into the operation to exterminate the Jews which took place in the Plungė rural district of the Telšiai district." (October, 2015, finding);

"We found no information, not even a hint, in the archival documents and works by historians examined that Jonas Noreika might have been a participant in the mass murder operations to exterminate the Jews in the Šiauliai district." (October, 2015, finding);

"In summary, we can say that during the period of the German occupation, Jonas Noreika did not participate in mass Jewish extermination operations in the Telšiai and Šiauliai districts. The Nazi occupational regime did, however, succeed in drawing him, along with other civilian administration Lithuanian officials, into the ordering of affairs connected with the isolation of the Jews." (October, 2015, finding);

The Center's finding claims that right from June of 1941 Jonas Noreika got involved in active anti-Nazi activities but **presents no arguments nor evidence for that in its findings.**

IV. DEFINITION OF THE CRIME OF GENOCIDE AND WAR CRIMES

War crimes are serious violations set by international law and customs regarding armed conflict which break the rules of warfare ² as defined in different international documents, for example, the Hague Convention and the Geneva Convention. ³

Following Lithuania's ratification of the Convention on the Prevention and Punishment of the Crime of Genocide (the Genocide Convention) and the Rome Statute of the International Criminal Court (Rome Statute), all war crimes committed during the Nazi and Soviet occupations and all crimes against humanity committed against Lithuania and the country's inhabitants, including the grave and extremely grave crimes committed in 1990 and 1991, are categorized as crimes against humanity and war crimes, and fall under the category of crimes against humanity and war crimes, and are punished and condemned.

The United Nations General Assembly on December 11, 1946, in resolution no. 96 (I) on the crime of genocide noted genocide is the denial of the right of entire groups of people to exist, just as murder is the negation of the right of individuals to exist; genocide is a crime under international law which is condemned by the whole of the civilized world.

Article 6 of the Rome Statute defines genocide as the murder of people who belong to a certain national, ethnic, racial or religious group, as well as gross bodily harm or the infliction of psychological harm to members of such a group, the creation of living conditions for such a group which leads to the death of its members or a portion of its members, measures taken to restrict the birth-rate of people belonging to that group and the forceful removal of children of that group to another group with the goal of exterminating all or some of the people of that group. The mass murder of Jews during World War II, i.e., their genocide, is called the Holocaust. ⁴

² Rome Statute of the International Criminal Court, published in Lithuania's State Gazetteer, no. 49-2165, article 8, 2003.

³ The Geneva convention regulates the protection of victims of war (the wounded, patients, those rescued from sinking ships, prisoners of war, civilians and children).

⁴ Meilus, E. Holokaustas arba Lietuvos tragedija (1941-1944). Vilnius: Generolo Jono Žemaičio Lietuvos karo akademija, 2001, p. 7.

Article 2 of the Genocide Convention says for the purpose of this convention genocide is considered the act attempting to destroy wholly or in part a national, ethnic, racial or religious group, specifically:

a) the murder of members of this group;

....

c) the intentional creation of living conditions for this group which are intended to physically destroy it or a part of it.

Article 2 of the Genocide Convention says the following acts should be punished:

a) genocide;

b) conspiracy to carry out genocide,

c) direct or public calls to commit genocide,

d) the attempt to commit genocide,

e) complicity in the commission of genocide.

In this context resolution no. 95 (I) adopted by the United Nations General Assembly on December 11, 1946, entitled "Affirmation of the Principles of International Law Recognized by the Charter of the Nuremberg Tribunal" is noteworthy, affirming the principles of international law recognized in the Nuremberg Statute and verdict of the Nuremberg Trials. These principles were laid out in the Principles of International Law Recognized in the Charter of the Nuremberg Tribunal and in the Judgment of the Tribunal adopted by the UN's International Law Commission in 1950.

Principle III says: "The fact that a person who committed an act which constitutes a crime under international law acted as Head of State or responsible Government official does not relieve him from responsibility under international law."

Article IV says: "The fact that a person acted pursuant to order of his Government or of a superior does not relieve him from responsibility under international law, provided a moral choice was in fact possible to him."

These principles recognized in international law on accountability for war crimes are applicable to all member-states at all levels in decisions about a person's responsibility regarding issues of war crimes. ⁵ It is noteworthy the Lithuanian Supreme Court in the trial of a war crimes case argued for its verdict by applying the above-mentioned principles (point 28.1 in the Lithuanian Supreme Court verdict of June 7, 2016, in criminal case no. 2K-214-976/2016). The court decided the accused in carrying out the orders of his superior had a moral choice which he didn't make use of. ⁶

War crimes are not the matter for consideration in this complaint. Neither does the complainant ask for judgment regarding Jonas Noreika's role in war crimes. It is simply important to understand an appropriate legal explanation of war crimes since, because of the lack of

⁵ See also page 21, Lithuanian Constitutional Court verdict no. KT11-N4/2014 of March 18, 2014, "DĖL LIETUVOS RESPUBLIKOS BAUDŽIAMOJO KODEKSO KAI KURIŲ NUOSTATŲ, SUSIJUSIŲ SU BAUDŽIAMĄJA ATSAKOMYBE UŽ GENOCIDĄ, ATITIKTIES LIETUVOS RESPUBLIKOS KONSTITUCIJAI," case no. 31/2011-40/2011-42/2011-46/2011-9/2012-25/2012

⁶ <http://eteismai.lt/byla/138834560478474/2K-214-976/2016>

application of the abovementioned principles and legal norms in its research work, the Center denies Jonas Noreika's role in the events of the Holocaust and trivializes his role, i.e., commits a criminal act as defined in article 170² of the criminal code.

V. DEFINITION OF DENIAL OF GENOCIDE AND WAR CRIMES

The UN's International Law Commission (ILC) has stated: "separate acts of genocide are in their origin conscious, intentional and volitional actions which the individual would normally not be able to commit without understanding they most likely will cause the corresponding consequences. These are not the sort of acts which could be committed accidentally or as the result of a lack of carefulness."⁷

The ILC presents this explanation of the goal: "The extent of knowledge of the details of a plan or a policy to carry out the crime of genocide would vary depending on the position of the perpetrator in the governmental hierarchy or the military command structure. This does not mean that a subordinate who actually carries out the plan or policy cannot be held responsible for the crime of genocide simply because he did not possess the same degree of information concerning the overall plan or policy as his superiors. The definition of the crime of genocide requires a degree of knowledge of the ultimate objective of the criminal conduct rather than knowledge of every detail of a comprehensive plan or policy of genocide. A subordinate is presumed to know the intentions of his superiors when he receives orders to commit the prohibited acts against individuals who belong to a particular group."⁸

At the plenary session of the International Holocaust Remembrance Alliance held in Toronto on October 10, 2013, confirmed a definition of Holocaust denial: "Holocaust denial is discourse and propaganda that deny the historical reality and the extent of the extermination of the Jews by the Nazis and their accomplices during World War II, known as the Holocaust or the Shoah. Holocaust denial refers specifically to any attempt to claim that the Holocaust/Shoah did not take place."

This meeting also noted Holocaust denial Holocaust denial is "intentional efforts to excuse or minimize the impact of the Holocaust or its principal elements, including collaborators and allies of Nazi Germany.:

In light of the explanation above of the crime of genocide and war crimes and the articles of international law cited, the statements by the Center in the earlier section should be equated with trivialization of war crimes and the role of their perpetrators and denial and trivialization of the role of perpetrators of genocide. The Center, which by its founding documents sets state policy in the area of history research and sets the direction and methodology of such research, has violated grossly article 99 of the criminal code of the Republic of Lithuania, article 6 of the Nüremberg Statute and the principles for the definition of the crime of genocide set forth by the United Nations.

⁷ UN Draft Code of Crimes against the Peace and Security of Mankind
http://legal.un.org/ilc/texts/instruments/english/commentaries/7_4_1996.pdf - article 17

⁸ Ibid., article 18

VI. DEFINITION OF CRIME AND JUDGMENT OF CRIMINAL ACT IN ARTICLE 170² OF THE CRIMINAL CODE

Denial of crimes against humanity is one the most serious forms of racial and religious discrimination.⁹ Denial, gross trivialization, approval or the distortion of historical facts treads on the values which are the foundation for fighting racism, anti-Semitism and other forms of intolerance, and therefore pose a real threat to public order, and such acts are not compatible with democracy and human rights, because they violate the rights of others.¹⁰

The Holocaust, genocide and other crimes against humanity are historical facts and their denial or glorification or gross trivialization is incompatible with the principles of democracy underlying public order in Europe and laying the foundation for the European Court of Human Rights, and the justification of Nazi policies is not protected freedom of speech.¹¹

Article 170² of the Criminal Code of the Republic of Lithuania: Public approval of international crimes, crimes of the USSR or Nazi Germany against the Republic of Lithuania or her inhabitants, their denial or their gross trivialization

1. **Whosoever publicly approves genocide or other crimes against humanity or war crimes** as recognized by the laws of the European Union or in the jurisprudence of the Republic of Lithuania or an international court, **denies them or grossly trivializes them, if this is done in an obnoxious or offensive manner or if this disrupts public order**, and also whosoever publicly approves of the aggression committed by the USSR or Nazi Germany against the Republic of Lithuania, genocide or other crimes against humanity or war crimes committed by the USSR or Nazi Germany in the territory of the Republic of Lithuania or against residents of the Republic of Lithuania, or the very grave or grave crimes committed in 1990 and 1991 against others, aggression against the Republic of Lithuania, the people who committed these or participated, denies these or grossly trivializes these, if this is done in an obnoxious or offensive manner, or if it disturbs public order,

shall be punished by fine or limitation of freedom, or arrest, or imprisonment for up to 2 years.

2. Corporate entities also bear responsibility and are held to account for the acts defined in this article.

It should be noted that the content of this statement examines the Center's actions in connection with the denial and trivialization of the role played by a Holocaust perpetrator and does not consider

⁹ European Court of Human Rights verdicts: Honsik vs. Austria, no. 25062/94, decision of October 18, 1995, D.R. 83; Marais vs. France, no. 31159/96, decision of June 24, 1996, D.R. 86.

¹⁰ Garaudy vs. France (dec.), no. 65831/01, ECHR 2003-IX

¹¹ See: Lehideux and Isorni vs. France, September 23, 1998, Reports of Judgments and Decisions 1998-VII; Glimmerveen and J. Hagenbeek vs. the Netherlands, no. 8348/78 and 8406/78, decision of October 11, 1979, DR 18; Kühnen vs. the Federal Republic of Germany (admissibility decision), no. 12194/86, decision of May 12, 1988; B.H., M.W., H.P. and G.K. vs. Austria, no. 12774/87, decision of October 12, 1989, DR 62; Remer vs. Germany, no. 25096/94, decision of September 6, 1995, DR 82; Honsik vs. Austria; Nationaldemokratische Partei Deutschlands, Bezirksverband München-Oberbayern vs. Germany, no. 25992/94, decision of November 29, 1995, DR 84; Nachtmann vs. Austria, no. 36773/97, decision of September 9, 1998; Witzsch vs. Germany (dec.), no. 41448/98, April 20, 1999; Schimanek vs. Austria (admissibility decision), no. 32307/96, decision of February 1, 2000; Norwood vs. the United Kingdom (dec.), no. 23131/03, ECHR 2004-XI.

the other acts defined in this article at hand. The acts which are to be examined are presented in bold above.

VI. 1. Object of the crime

Lawmakers indicate the object of the act defined in article 170² of the criminal code is values protected by the international community (the banning of aggression, major human rights and freedoms, banning genocide, war crimes and crimes against humanity), the honor and dignity of victims of aggression, genocide, crimes against humanity, and war crimes as well as the honor and dignity of those who fought against occupation, and also the maintenance of public order. This sort of base and grotesque behavior by a state institution inculcates warped and distorted views on racial equality among the public and stimulates expressions of ultra-nationalism, and disrupts public order and social tranquility.

VI. 2 Objective aspect of the crime

Article 170² of the criminal code states the **criminal act can be expressed through the following alternative actions: I) (A) approval, (B) denial or (C) gross trivialization of i) genocide or ii) other crimes against humanity, or iii) war crimes** as recognized by the laws of the Republic of Lithuania or the European Union, or in the jurisprudence of Lithuanian courts or international courts.

The aforementioned laws mean the Lithuanian Law on the Genocide of Residents of Lithuania,¹² the criminal code of the Republic of Lithuania, the Framework Decision and other legal acts criminalizing genocide, war crimes and crimes against humanity.

The international treaties ratified by the Lithuanian parliament are an integral part of Lithuania's legal system and their articles are treated as law in the Lithuanian legal system¹³ The practice of the courts is to apply them directly in trying war crimes cases (Lithuanian Supreme Court verdict of June 7, 2016, in point 28.1 in criminal case no. 2K-214-976/2016 28.1).

"The **denial of crimes against humanity must be baseless without any historical documents** or, even if it has basis, those historical documents are also the same sort of falsification of history. **The revision of the historical assessment of these crimes, not based on research or facts,** is not considered a person's freedom of speech, these acts are punishable in accordance with criminal justice. Included in the denial of crimes against humanity are **approval for the Holocaust carried out in Lithuania**, the Soviet genocide, and the mass murder, deportation and other repressions of residents of Lithuania ... **as well as their denial or gross trivialization.**"¹⁴

¹² Law on Responsibility for the Genocide of Residents of Lithuania, State Gazetteer, 1992, No. 13 - 342

¹³ Constitutional Court of the Republic of Lithuania finding in January 24, 1995, case On the European Convention for the Protection of Human Rights and Basic Freedoms, State Gazetteer, 1995, No. 9-199; Constitutional Court of the Republic of Lithuania verdict of October 17, 1995 in the case On the International Treaties of the Republic of Lithuania. State Gazetteer, 1995, No. 86-1949; Constitutional Court of the Republic of Lithuania verdict of December 18, 1997, in the case On the Budget of the State Social Insurance Fund, State Gazetteer, 1997, No. 117-3032; Constitutional Court of the Republic of Lithuania decision of April 25, 2002, in the case On the Refusal to Consider Part of a Request, State Gazetteer, 2002, No. 44-1679.

¹⁴ Explanatory note to draft amendment of articles 170² and 284(1) of the criminal code of the Republic of Lithuania.

It should be noted that the denial or gross trivialization of genocide, crimes against humanity and war crimes isn't consider hate-filled *per se*.¹⁵ According to the Dictionary of the Lithuanian Language, **pritarimas** [approval] means agreeing with something, support, defense, oral approval; while **neigimas** [denial] is to be interpreted as rejection, lack of recognition, and **šiurkštus menkinimas** [gross trivialization] is impolite, gross, obnoxious non-recognition of something important and valuable, demeaning something, making it customary. In this case, "šiurkštus" [gross] is an assessment criterion which is adjudged by the court and determined based on the totality of all factual circumstances.

VI. 3 Assessment of episodes of criminal actions

Before considering the arguments made by the Center in its documents, it's important to note the facts and circumstances the Center officially admits are the factual circumstances and assertions it has stated and made in its historical findings:

until the Nazi occupation in June of 1941, Jonas Noreika served on the Lithuanian military court and held the rank of captain. On August 3, 1941, Noreika was appointed head of the Šiauliai district; "information about Jonas Noreika's activities after the uprising, i.e., at the end of June and July, 1941, is rather fragmentary, ... in sum we can say that **captain Jonas Noreika had service ties with two organizations in July of 1941: the Telšiai LAF organization and the Plungė kommandatura.**" There is also information that Jonas Noreika lived in Telšiai in July of 1941, where **he commanded the LAF organization in the Telšiai district and actively participated in public activities. As the commander of the local activists [LAF], he contributed to the legal persecution of people who had cooperated with the Soviet occupation regime in 1940 and 1941.**" (historical finding of October, 2015)

Arguments in the Center's findings

1. **"The Center has investigated thoroughly Jonas Noreika's activities during the German and Soviet occupational period"** (October, 2015, finding);

"Repeated comprehensive studies by the Center's historians failed to confirm ... statements contained in Antanas Pakalniškis's memoirs which alleged Noreika was a participant in an operation to exterminate Jews (October, 2015, finding);

"The Center's historians, based on an analysis of all archival documents accessible at this time, determined that the circumstances of the aforementioned facts deny the statements presented in Antanas Pakalniškis's memoirs." (October, 2015, finding).

In researching Jonas Noreika's activities, the Center based that research on **all sources of information available to it"** (reply of February 26, 2018, to the office of parliamentary ombudsman and to the plaintiff).

¹⁵ Almagor, R. C. Holocaust Denial is a Form of Hate Speech. Amsterdam Law Forum, 2009, vol. 2, p. 33.

It should be noted these are intentionally mendacious statements. The Center, one of whose main functions is the study of historical events and the restoration of historical justice, couldn't not have known there are archival documents which directly and indirectly testify to Jonas Noreika's participation in war crimes. While the Center knew about the existence of documents testifying to criminal conduct, the Center publicly announced it had studied comprehensively all archival documents to which it had access, but had found no evidence of Noreika's complicity in the Holocaust.

In claiming there are no [contrary] archival documents and that it had examined those which exist, the Center defended Jonas Noreika, i.e., expressed approval for the war crimes he allegedly committed.

2. "The results of the research presented here allow us to say that in July of 1941 the Nazi occupational regime was not successful in drawing Jonas Noreika into the operation to exterminate the Jews of the Plungė rural district in the Telšiai district." (October, 2015, finding)

It's worth noting that in its earlier July, 2015, finding addressed to the mayor of Vilnius and the plaintiff, the Center, denying the historical fact published in memoirs (that Noreika issued oral orders in July of 1941 for the extermination of the Jews of Plungė), stated: **"It must be noted that couldn't have performed such functions because** the German occupational regime didn't use officials from the Lithuanian civilian administration for organizing and executing extermination operations against Jews, but rather used officials from the police structures, the auxiliary police and the self-defense battalion. **Jonas Noreika was not part of the police structure, but rather an employee and head of a civilian agency."**

It should be noted the Center didn't cite and source or order from the Nazi regime for the mass murder of the Jews of Plungė and Telšiai to support this contention.

It should be noted that this argument by the Center compared with the stated "professional ties" in the October, 2015, finding is logically flawed. Jonas Noreika was the commander of the Žemaitija LAF and, as if that weren't enough, was connected by "professional ties" to the Plungė *kommandatura*. In the case under consideration, discussion centers around the oral order to kill issued in Plungė on July 13, 1941. The Center in claiming "**Noreika was not part of the police structure, but rather an employee and head of a civilian agency**" is ignoring the historically recognized fact that he became an employee of a civilian agency (head of the Šiauliai district) later, from August 3 to 5. This argument by the Center is factually mendacious and misleading, in the attempt to diminish Noreika's alleged culpability.

The order given by Noreika and mentioned by Pakalniškis came before his appointment as head of the Šiauliai district, i.e., when Noreika had "professional ties" with the Plungė *kommandatura*. The Center officially claims the Plungė *kommandatura* and its commander P. Alimas were responsible for the mass murder of the Jews of Plungė.

Pakalniškis, who worked as secretary of the Plungė *kommandatura* in the summer of 1941, says in his memoirs that at the time when awful things took place in the *kommandatura*, there were only a

few Germans present, and that Jonas Noreika worked in the same building, the next door over was LAF headquarters. *Pakalniškis says Noreika orally ordered and later, shouting the order repeated to a young German who had asked what they should do with the Jews of Plungė who had been locked inside the synagogue for two weeks by then.*

In claiming Noreika "couldn't have performed such functions," **the Center suppresses the fact Noreika was the commander of the LAF insurgents throughout Žemaitija**, he was the leader of armed people who were the highest government in Žemaitija following the withdrawal of the Communists, unlike in Vilnius and Kaunas where events were directly dictated by the Nazi SD and SS.

As we see in Jonas Noreika's order of July 25, 1941, (appended) he issued orders to his soldiers banning summary executions. That means Noreika was in command of his armed men, this order was not issued by the German commandant and the prosecutor of Šiauliai didn't discuss the status of events with the German commandant. This confirms the power and independence of the LAF in Žemaitija in the summer of 1941.

The Center basically refused to use Pakalniškis's recollections even though his version of events is confirmed by other circumstantial facts about Noreika's person. The Center bases its refusal to take these memories into account by saying the book cannot be considered reliable academically because of contradictions in different published editions of this book. The contradictions are of the nature that newer editions of the book provide much more detail than earlier editions. THIS IS AN UNFOUNDED REJECTION OF THE ACCOUNT BY THE ONLY LIVING WITNESS. Many academic books have re-issues and additional material, because scholarship evolves, and these newly discovered matters are presented in the newer editions of his memoirs, so the Center's argument they are "un-academic" is baseless. The published memoirs of this witness are more reliable evidence than those sources which the Center uses, namely, confessions made under interrogation by the KGB.

3. "In the archival documents investigated and in works by historians, **no information, not even a hint, was discovered** showing Noreika had been a participant in the mass extermination operation carried out against the Jews in the Šiauliai district." (October, 2015, finding)

"In summary we can say that during the period of the German occupation, Jonas Noreika did not participate in mass extermination operations against the Jews in the Telšiai and Šiauliai districts." (October, 2015, finding)

These officially announced statements are deceptive. There are records in archival documents showing testifying to Noreika's alleged war crimes.

Appended archival documents: order for the removal of the Jews of Gruzdziai, confirmation of payment of money to Šiauliai battalion soldiers (formed from the ranks of the Telšiai LAF with headquarters in Telšiai) for the period during which the Žagarė ghetto was liquidated [meaning all the Jews there were murdered] and permission issued to retain dentistry equipment for two months--all these **testify to Jonas Noreika's personal participation in resolving the Jewish problem in the Šiauliai district.**

Appended as well is correspondence concerning the exploitation of Šiauliai ghetto prisoners as slave labor in works to extend the railroad and an inquiry by the municipality asking why they hadn't received money for this labor, as well as lists compiled by him of prisoners of war needed and a plan/questionnaire for constructing a slave labor camps for POWs, all of which **testify that Jonas Noreika** exploited his post as head of the district to line his own pockets and acted wantonly and according to his own whim, i.e., **he committed war crimes.**

It's important to understand here that the armed men of the LAF called together by Noreika were always with their captain and carried out his orders in Telšiai, Plungė and Šiauliai. Noreika was sent to the Stutthof camp in 1943 for disobedience, because he refused to turn his men over for service in the SS forces. The SS was the highest organization in the Nazi chain of command, and therefore Noreika's LAF soldier men were apparently considered worthy to join it. [Actually I think Noreika refused to turn his men over to a Waffen-SS legion, and the Waffen SS were not the same as the SS, they were national battalions formed of Estonians, Latvians, Croats etc. who did the dirty work under Nazi command--G.] The fact Noreika confirms the Šiauliai battalion received their salaries (for the period of the liquidation, i.e., mass murder of the Jews of the Žagarė ghetto) **testifies to Noreika's personal involvement.** The battalion got their salaries not from the Nazi SD or SS, but from the head of the district, from their captain.

It's a noteworthy fact Noreika issued the order for creating the Žagarė ghetto and later paid his battalion for the period when the ghetto was liquidated, which is sufficient for stating Noreika should have been tried and punished for genocide under the Principles of International Law Recognized in the Charter of the Nuremberg Tribunal adopted by the UN's International Law Commission in 1950, regardless of whether there were Nazi orders from above. It should also be noted Noreika had freedom of moral choice. Earlier Šiauliai district head Urbaitis made use of this freedom of conscience, resigning following the issuing of his order for the establishment of the Šiauliai ghetto. Noreika quickly took over his positions and he truly understood the responsibility of his future duties, and sought them. These facts make him an accomplice in the crime of genocide.

By claiming there is not the slightest hint even of Noreika's participation in mass murder operations, the Center is expressing approval for war crimes.

Because the Center is defined in law as a center which researches genocide, resistance and war crimes, ignorance of the law in this case is not an excuse for forgiving the Center from responsibility.

4. "Nonetheless, the Nazi regime was successful in drawing him, as with other Lithuanian officials in the civil administration, into the administration of affairs connected with the isolation of the Jews." (October, 2015, finding)

The Center in its findings failed to indicate that herding Jews into ghettos is a war crime under international law and under Lithuanian law. By failing to say this, the Center diminishes Jonas Noreika's role as a Holocaust accomplice.

The Center holds to the position that **"in historiography the isolation of the Jews and mass murder are not considered two identical things," "forcing Jews into ghettos ... provided the**

Nazis the opportunity to move on to the murder of the Jews, i.e., to exterminate them as an undesirable race," "but there is no information that Noreika might have been connected with the organization or the execution of the mass murders of Jews." (October, 2015, finding)

This statement is direct approval for a crime against humanity and its trivialization. The Center doesn't consider forcing people into ghettos a crime, even though according to the above-indicated definitions of war crimes, Jonas Noreika is an accomplice in a war crime, even if he were following orders from Šiauliai commissar Gewecke.

5. In the Center's history findings, Center director Teresė Birutė Burauskaitė **calls district head Jonas Noreika's orders** for the appropriation of property and the foundation of the Žagarė ghetto "letters," thus **softening the content of the written orders** and diminishing Noreika's role in administering the isolation of the Jews and the seizure of their property.

Even though the Center in its October, 2015, finding quotes Noreika's order of August 22, 1941 (Lithuanian Central State Archive f. R-1099, ap. 1, b. 1, l. 156) and his order of September 19, 1941 (Lithuanian Central State Archive f. R-1099, ap. 1, b. 1, l. 239) containing the instruction to present lists of Jewish property "to me" (which must be understood to mean to Noreika personally) and to deposit the money made from selling Jewish property to the district head's bank account (controlled by Noreika), the Center doesn't call these actions war crimes, and doesn't offer any commentary or statements about these.

It should be noted in keeping with the above-indicated principles for judging war crimes that Noreika participated in the seizure of property and in operations to sell it. This action is a war crime but does have a statute of limitations. The Center in not making any statement about these activities is expressing approval for Jonas Noreika's war crimes.

All of the above-mentioned war crimes are not just a matter of assessing the facts of history, and therefore we believe that in rendering judgment on the denial, gross trivialization or approval of these actions as the crime of hate-speech, we should base that judgment on the criterion of universally-recognized fact and historical truth, e.g., historical documents and factual circumstances which can be determined from personal testimonies and documents.

The finding from the Center claims Noreika became involved starting right back in June of 1941 in anti-Nazi activities, but **no arguments or evidence for this claim is presented in the Center's findings of history.**

The acts defined in article 170² of the criminal code says these acts must be committed publicly.

One of the necessary features of the objective side of article 170² is the manner in which the crime is committed. The actions defined in article 170² have to be committed in a threatening, obnoxious or insulting way. These indicators are subjectively judges and depend on different circumstances, and therefore the consequences the action causes must be taking into consideration, including how the victim reacted to the act, the public's reaction, and so on.

If the act is not committed in a threatening, obnoxious or insulting manner, in order for the act to qualify under article 170² it must cause corresponding consequences, the public order must be disturbed by the action. The question justly arises: how should disruption of the public order be determined? If the disruption of public order is determined according to article 284 of the criminal code, then we believe the indicators defined in article 284 repeat the aforementioned manners of commission of the act, and therefore, in one way or another, if certain consequences are caused--the disruption of public order--then that means the criminal act was committed in a certain manner, threatening, obnoxious or insulting.

It is to be noted that article 1, part 2 of the Framework Decision determines member-states may choose between the following criminalization methods: to criminalize acts which could disrupt public order, or acts which are threatening, obnoxious or insulting. Lithuania included both alternative methods in her criminal code.

The above-mentioned statements by the Center were published publicly, on the Center's internet page, the July, 2015, finding was sent to the mayor of Vilnius, the Government chancellor and the director of the Vrublevskiai library. Taking into consideration the archival documents discovered during research testifying to Jonas Noreika's participation in war crimes, the Center's arguments for its statements are obnoxious and insulting to people of Jewish ethnicity and to family members of Holocaust victims, including the plaintiff.

It should be noted that negative consequences were caused and the public order and tranquility were disturbed and by these statements issued by the Center. The Lithuanian Jewish Community requested the plaque commemorating Jonas Noreika be removed based on the archival evidence, while officials such as Vilnius mayor Remigijus Šimašius went by the likely criminal arguments made by the Center and failed to take action. As the Vilnius mayor told the national public television news program Panorama on September 21, 2018, "historians should solve these disputes." Because the state's official historians are engaged in committing a criminal act, Holocaust denial, this issue will not be solved in the ranks of the historians. The Center as a state institution, occupying itself exclusively to research into war crimes of the 20th century, has its own status, and people believe in this status. This situation divides society, the Center is forcing innocent inhabitants of Lithuania to believe its criminal statements and its interpretation of historical events. This disturbed domestic tranquility.

Subject of the crime

The subject of the crime is a real person or corporate entity. In the case under consideration here, the subject is the state institution the Center for the Study of the Genocide and Resistance of Residents of Lithuania or its director Teresė Birutė Burauskaitė, because the episodes of criminal activity are recorded in texts signed by this person holding the post of general director of the Center. The material denying and trivializing the role of Holocaust perpetrators is posted on the Center's internet webpage. That means the criminal statements were made with Teresė Birutė Burauskaitė, acting in the name of the Lithuanian state, and are confirmed by her signature. This operation in the person of the general director presupposes the aspiration to deny and trivialize publicly the role and involvement of Holocaust perpetrators. Because these statements were made

by the head of an agency performing historical research, that presupposes that person's knowledge she was lying, and that there are extant archival documents testifying to Jonas Noreika's active involvement in the Holocaust in Žemaitija. These documents do not contradict the testimonies of the witnesses whom Teresė Birutė Burauskaitė rejects as unreliable in her published findings. This scale of denial presupposes the conclusion this person understood the consequences of her actions and sought those consequences.

The plaintiff's belief is that the director's personal responsibility should be taken into account more here. Meting out punishment to the state institution wouldn't accomplish the goals of the sentence, because the institution would pay the money into the state budget and then receive more state funding later.

Subjective aspect of the crime

We would like to emphasize that it's not just any statements opposed to historical facts recognized by court decisions which can be recognized as criminal, e.g., if a person doesn't know anything about the aforementioned crimes, i.e., has gaps in his education, then that person's statements that, for instance, there was no Holocaust, cannot be held to be a form of hate-speech, because that person can't be punished simply for not knowing.¹⁶ In trying to determine which statements are criminal and which aren't, we always have to take into careful consideration the contents of the statement and the aims of the person alleged to be expressing hate.

According to the Additional Protocol on the Criminalization of Acts of a Racist and Xenophobic Nature Committed Using Computer Systems in the Convention on Cybercrime, the motive for denying crimes against humanity is usually presented as the findings of academic research, although really this act is intended to support or encourage a political motive which would help revive negative crimes. Furthermore, this behavior is also inspired or even incited and encouraged by the actions of racist and xenophobic groups, including actions on computer systems. The expression of these ideas insults the people who were the victims of these crimes, or the family members of the victims. Moreover, this threatens the public dignity of these people.¹⁷

In spreading error in society with their propaganda as historical revisionism,¹⁸ the deniers of these crimes are attempting to spread extremist ideas, proposing unfounded arguments against the fact of well-known historical crimes, for example, the conviction among Holocaust deniers that the Jews fabricated and exaggerated the events of the Holocaust. These criminal acts are the intentional encouragement of enmity against a social group of people.¹⁹ It should be believed the latent goal of these criminal acts is to pave the way for a repeat of acts of this nature,²⁰ as posts filled with hate

¹⁶ Almagor, R.C. Holocaust Denial is a Form of Hate Speech. Amsterdam Law Forum, 2009, Vol. 2, p. 34

¹⁷ Additional Protocol to the Convention on Cybercrime, Explanatory report, para 39

¹⁸ Starr, S. Understanding Hate Speech. In: Möller, Ch.; and Amouroux, A. The Media Freedom Internet Cookbook. Vienna: Organization for Security and Co-operation in Europe (OSCE), Office of the Representative on Freedom of the Media, 2004, p. 14.

¹⁹ Almagor, R.C. Holocaust Denial is a Form of Hate Speech. Amsterdam Law Forum, 2009, Vol. 2, p. 35

²⁰ Almagor, R.C. Holocaust Denial is a Form of Hate Speech. Amsterdam Law Forum, 2009, Vol. 2, p. 36

desensitize the public. They give rise to the feeling that hate and insulting others is normal and acceptable.²¹

The true intentions of the Center's director are not known to the plaintiff, but in denying Jonas Noreika's criminal role in World War II, Teresė Birutė Burauskaitė is trying to defend the image of Noreika as a member of the resistance. It is important to point out that this image is not based on documents, and there are no known facts regarding his alleged anti-Nazi activity. Center historian A. Rukšėnas in a 26-page article printed in the Center's magazine *Genocide and Resistance* in 2016 failed to name specifically any tangible episodes of resistance activities. Hence the Center's intention is to justify the Holocaust allegedly propagated and carried out in Žemaitija by Lithuanians and other war crimes committed by Jonas Noreika, foisting responsibility off on the Nazis, trivializing the role of Holocaust perpetrator and failing to report war atrocities to the public. These are intentional actions by the Center's director.

7. CONCLUSION

The Center in its findings on Jonas Noreika's activities and in its reply to our query, "On Changing the Finding on Noreika" of July, 2018 (appended), indicated the Lithuanian police and power structures were firmly under Nazi subordination and Lithuanians themselves did not take initiative in exterminating Jews, but this is untrue. **The Center talks about all of Lithuania the the occupational period of four years, but when it rules on Jonas Noreika's possible involvement in exterminating the Jews of the Telšiai, Plungė and Šiauliai districts, the Center suddenly restricts itself to just four months, and the only territory to be considered is Žemaitija!**

Between 2015 and 2018, the director of the Center actively denied Noreika's criminal role. In the magazine the Center publishes in 2016 there also appeared Center historian Alfredas Rukšėnas's 26-page article portraying Noreika as a rescuer of Jews who knew nothing about and had no genocidal tendencies. Rukšėnas only talks about Noreika's actions in seizing property, creating a neologism to characterize these actions, "economic genocide," thus trivializing Noreika's crimes. I believe that in light of the documents from our historical research, "economic genocide" should be understood as the destruction of an ethnic group based on economic calculations.

It is noteworthy that the findings prepared by the Center and signed by Teresė Birutė Burauskaitė are posted on the internet page of the Center. This internet page also contains the Center's 2018 reply "On Changing the Finding on Noreika." These documents are publicly accessible. These documents were produced by a state institution funded from the state budget, one of whose goals defined in law is the restoration of historical truth and justice. The statements in these documents foster a distorted belief about Jonas Noreika's culpability in the mass murder of Jews, i.e., it fosters the categorical and seemingly unambivalent opinion that this person cannot be considered to have contributed to the events of the Holocaust. The Center's statements grossly contradict the testimonies of eye-witnesses, the known facts and the archival documents. Thus they cause confusion in society, incite the passions of radical nationalist points of view, violate public order

²¹ *Ibid.* p. 36

and disturb domestic tranquility. This is also rudely insulting to the descendants of the Jews of Žemaitija.

These actions by the Center's director and its historians correspond to the definition of Holocaust denial, are committed in the name of the Republic of Lithuania, and this propaganda is being propagated using state funds. According to cassation court case-law and jurisprudence, criminal liability under article 170² of the Lithuanian criminal code is applied not just for the denial or gross trivialization of the crimes in question, but for denial, gross trivialization or approval expressed for all facts of aggression committed by the USSR and Nazi Germany against the Republic of Lithuania (cassation resolution in criminal case no. 2K-7-102/2013).

In consideration of what is outlined above, we request a pre-trial investigation be launched regarding Teresė Birutė Burauskaitė and/or the Center for the Study of the Genocide and Resistance of Residents of Lithuania for the commission of the crime defined in article 170² of the criminal code (public approval for international crimes, crimes committed by the USSR or Nazi Germany against the Republic of Lithuania or her inhabitants, and their denial or gross trivialization).

In hearing the facts in this case, we ask you to use for guidance the Lithuanian Supreme Court's explanation recently of article 170² of the criminal code in the Algirdas Paleckis case, the verdict of January 22, 2013, in criminal case no. 2K-7-102/2013.

In hearing the facts in this case, we also ask you to take into consideration the reply of July, 2018, "On Changing the Finding on Noreika," asking you to note there is no analysis in this publicly-posted reply, not even a hint, about the archival documents (all of which are appended here) presented in conjunction with the query, which give foundation to suspicions regarding Jonas Noreika's culpability in the Holocaust in the Šiauliai district and in Žemaitija.

Please contact the plaintiff's lawyer Rokas Rudzinskas regarding all procedural issues by email at rokas@rlaw.lt or by telephone at 861488303. Please send correspondence intended for the plaintiff to this address: Attorneys Office of Rudzinskas and Partners, A. Mickevičiaus street no. 14-2, Vilnius.

Respectfully,

Rokas Rudzinskas, attorney

APPENDICES:

1. Attorney's order

2. Letter of 2015 to the municipality regarding the removal of the plaque commemorating Jonas Noreika
3. Center's finding of July, 2015, on Jonas Noreika
4. Center's finding of October, 2015, on Jonas Noreika's activities during World War II
5. Center's 2017 reply on interpretation of the Holocaust
6. Order by office of parliamentary ombudsman,
7. Center's reply of 2018 on interpretation of the Holocaust
8. Center's letter of October 24, 2017, on the activities of the Lithuanian Nationalists Party;
9. Timeline for 1941 and 1942 of LAF/LNP activities and Noreika's activities;
10. July, 2018, reply by Center on changing finding regarding Jonas Noreika;
11. Query on changing the finding regarding Jonas Noreika;
12. Appendices to query [LCVA means Lithuanian Central State Archive]:
 - (1) LCVA-fR-1099-a-1-b2- 1520-bylaVidugiriuiir Chaleckui
 - (2) LCVA-fR-1099-a.1- b.2- 1137-Tryskiai
 - (3) LCVA-fR-1099-a1-b2- 1338-Slucka1
 - (4) LCVA-fR-1099-a1-b2- 1440-Slucka2
 - (5) LCVA-fR-1099-a1-b2- 1464-Noreikoskalejimas
 - (6) LCVA-fR-1099-a1-b2- 1465-Noreikoskalejimas2
 - (7) LCVA-fR-1099-a1-b2- 1466-Noreikoskalejimas3
 - (8) LCVA-fR-1099-a1-b2- 1468-Noreikoskalejimas5
 - (9) LCVA-fR-1099-a1-b2- 1468-Noreikoskalejimas5
 - (10) LCVA-fR-1099-a1-b2- 1504-Slucka3
 - (11) LCVA-fR-1099-a1-b2-l-380-dantutechnikas
 - (12) LCVA-fR-1099-a1-b2-l294-į Šiaulių getą
 - (13) LCVA-fR-1099-a1-b2-l418-Juodeikino verslas
 - (14) LCVA-fR-1099-a2-b2-1133-Algos žydšaudžiams
 - (15) LCVA-fR-1099-ap1-b1-l 239-Noreikos 41 09 10 isakymas dėl likusio žydų turto panaudojimo
 - (16) Žemaicių žemė, 1941, No. 5, excerpt
 - (17) Jonui Noreikai būdingos Mintys
 - (18) Jono Noreikos LAF Telšiai tinklas
 - (19) LCVA-f1075-a2-b5-l54A-ZyduPadetiesNuostatai
 - (20) LCVA-f1075-a2-b6-l35-NoreikosIsakymas LAF Telsiai-1941 07 25
 - (21) LCVA-f1075-a2-b19-l3R-Teisė Nešioti Ginkla
 - (22) LCVA-fR1099-a1-b32-l183-Karo Belaisviai
 - (23) LCVA-fR1099-a1-b32-l185-Karo Belaisviai Juodrastis
 - (24) LCVA-fR1099-a1-b38-l22-Parama Studentams
 - (25) LCVA-fR1441-a2-b10-Vladas Bauža - Mirties Bausmė

- (26) Excerpt from Matas Krygeris's book On Noreika
- (27) Vaižganto-ir-Sinagogos-gatvės-Plungė
- (28) Žemaičių žemė, 1941 No. 5
- (29) Confirmation by Silvia Foti, granddaughter of Jonas Noreika;