

THE SPOLIATION OF RUSSIA

I

THE NAZI CONSPIRATORS PLANNED TO ACQUIRE BY FORCE THE FOOD RESOURCES OF SOUTHERN RUSSIA IN ORDER TO PROVIDE GERMANY WITH VITAL RAW MATERIALS WHICH SHE LACKED; THEY FORESAW THAT THEIR PLAN WOULD INVOLVE THE STARVATION OF MANY MILLIONS OF RUSSIAN CIVILIANS IN THE INDUSTRIAL REGIONS.

The Intention of the Nazi Conspirators to Attack Russia and to Exploit her Economically was Formulated Long Prior to the Aggression Against Russia.

1. Defendant KEITEL informed Thomas on 2 August, 1940 that Hitler had stated that preparations must be made for every political contingency in 1941; that an army of 120 divisions would not suffice; and that an army comprising approximately 180 divisions would be required in 1941. According to Thomas' notes, one of the reasons for this new directive seemed to have been the recognition that "The relationship to Russia may be modified in the year 1941".

EC 17, p. 144. Note for files by THOMAS, entitled "Aktennotiz über die Entwicklung der Rüstungslage im Sommer, 1940" ("Development of the Armament Situation in the Summer of 1940"), p. 3.

On 26 February, 1941, defendant GOERING expressed agreement with Thomas' view that occupation of only the Ukraine would not have any value, but that the Baku oil territory must under all circumstances also be obtained. GOERING told Thomas that:

"He wants the exploitation of occupied Russia for the purposes of a military economy to be different from the way in which the exploitation has so far been handled in the West and in Poland. He demands that OKH be stripped of those functions and that a completely independent organization under his command be established, which should enter the country together with the frontline troops, executing very specific orders, previously formulated".

EC 17, pp. 23 & 24. Note by THOMAS, 27 February, 1941, concerning a report which he gave to GOERING on 26 February, 1941, "Aktennotiz über Vortrag beim Reichsmarschall, 26.2.41", pp. 1 & 2.

2. The essence of the German policy, approved "by the highest authorities" was to strengthen the German war potential by acquiring the food resources of Southern Russia.

EC 126, p. 5. "Wirtschaftspolitische Richtlinien für Wirtschaftsorganisation Ost, Gruppe Landwirtschaft" ("Economic Policy Directives for Economic Organisation East, Agricultural Group") issued by Wirtschaftsstab Ost Gruppe La (Economic Staff East), dated May 23, 1941.

It was recognized that the necessary consequence of this policy was to doom the Russians in the industrial areas to starvation. It was envisaged that "many tens of millions of people in this area will become redundant and will either die or have to emigrate to Siberia". But the decimation of the "Great Russian" people was viewed with favor, for they were considered "an irreconcilable enemy of Germany and Europe" (id. p. 9).

In particular, the aims of German policy were developed in this document substantially as follows: Russia's exportable surplus of grain is "decisively determined not by the size of the crop but by the level of domestic consumption" (id. p. 3); "food consumption must be forced down accordingly, since Germany and Europe require surpluses under any circumstances" (id. p. 3); such reduction should be accomplished by an isolation of the Russian food surplus area, the black soil area. "The consequences will be cessation of supplies to the entire forest zone, including the essential industrial centers of Moscow and Petersburg" (id. p. 4). The results of such a policy were defined as follows:

- "1. All industry in the deficit area, particularly the manufacturing industries in the Moscow and Petersburg regions as well as the Ural district, will be abandoned. It may be assumed that these regions today absorb an annual 5-10 million tons from the food production zone.
2. The Trans-Caucasian oil district will have to be excepted, although it is a deficit area. This source of oil, cotton, manganese, copper, silk and tea must continue to be supplied with food in any case, for special political and economical reasons.
3. No further exceptions with a view to preserving one or other of the industrial regions or enterprises must be permitted.
4. Industry can only be preserved insofar as it is located in the surplus region. This applies, apart from the above-mentioned oilfield regions in the Caucasus, particularly to the heavy industries in the Donez district (Ukraine). Only the future will show to what extent it will prove possible to maintain in full these industries, and in particular the Ukrainian manufacturing industries, after the withdrawal of the food surpluses required by Germany". (Id. p. 5).

The above four points were said to have "received the approval of the highest authorities" (id. p. 5) and the official German attitude to the economic consequences of the cessation of food imports into the northern "forest belt", was defined as follows:

"Germany is not interested in the maintenance of the productive power of these territories, except for supplying the troops stationed there. The population of these areas, in particular the urban population, will have to face most serious distress from famine. It will be necessary to divert the population into the Siberian spaces. Since rail transport is out of the question, this, too, will be an extremely difficult problem". (Id. p. 6).

It was concluded that if Germany was to derive any benefit from the deficit regions, it must immediately seize all movable agricultural assets, such as crops, seeds, and livestock, (id. p. 6).

An increase in the meat ration in Germany, demanded by the Führer, "can only be achieved by the most drastic seizures of Russian livestock holdings, particularly in areas which are in a favorable transport situation in relation to Germany".

(Id. p. 7).

A further step towards destroying the sources of food supplies in the northern food deficit areas was to be made by seizing the Soviet fishing fleet:

"The fisheries in the North constitute a special problem. Germany's aim must be to seize the approximately 100 steam fishing vessels in Murmansk, Kola, etc., in order to utilize them for German benefit in fishing operations based on Norway ... Thus, there is no question of a development of Russian fisheries, but what is needed is conquest of the Russian fishing fleet". (Id. pp. 7 & 8).

The report also stated that:

"Many tens of millions of people in this area will become redundant and will either die or have to emigrate to Siberia. Any attempt to save the population there from death by starvation by importing surpluses from the black soil zone would be at the expense of supplies to Europe. It would reduce Germany's staying power in the war, and would undermine Germany's and Europe's power to resist the blockade. This must be clearly and absolutely understood. The manufacturing industries in Belgium and France are much more important for Germany and the German war potential than those in Russia. It is therefore much more essential to safeguard food supplies to those countries through surpluses from the East than to make an ambitious attempt at preserving Russian industry in the food-consuming zone.

One must always bear in mind that the Great Russian people, whether under Tsarism or Bolshevism, is always an irreconcilable enemy not only of Germany, but also of Europe. From this it also follows that there can be no question of introducing marketing regulations or food rationing in these territories. Rationing would establish a claim against the German administration on the part of the population, and such a claim must be rejected beforehand". (Id. p. 9).

It was stated to be a minimum aim, which must be attained at any price, to provision the Wehrmacht from enemy territory in the third year of the war.

Second priority, after satisfying Wehrmacht needs, was given to export of food to Germany for civilian consumption. In the first place it was contemplated to export oil seeds equivalent to 400,000 tons of vegetable oil. Bread grain was to come next, Wehrmacht requirements and transport conditions permitting. (Id. pp. 13 & 14).

Considerable additions to Germany's meat supplies were expected out of the seizure of livestock in the Northern food deficit zone. The document emphasized the need for carrying out the seizure as quickly and comprehensively as possible, since "cessation of fodder supplies will make it impossible to seize this livestock at a later date". (Id. p. 15). All tinplate stocks in Russia were to be seized, (id, p. 15).

In summing up the objectives of German agricultural policy in Russia, the report once more re-iterated that "extinction" of a large part of the Russian population is part of the German program:

"In conclusion, the principles must be pointed out once more: Under the Bolshevik system Russia has, purely out of power motives, withdrawn from Europe and thus upset the European equilibrium based on division of labor. Our task is to re-integrate Russia with the European division of labor, and it involves, of necessity, the destruction of the existing economic equilibrium within the Soviet Union. Under no circumstances should we try to preserve what has existed thus far. We must deliberately turn away from the existing situation and once again bring Russian food resources into the European framework. This will inevitably result in an extinction of industry as well as of a large part of the people in what so far have been the food consuming areas. This alternative must be grasped in all its hardness and severity. (Id. p. 18).

.....

Our problem is not to replace intensive food production in Europe through the incorporation of new space in the East, but to replace imports from overseas by imports from the East.

1) We must use the Eastern spaces for overcoming the food shortage during and after the war. This means that we must not be afraid of drawing upon the capital substance of the East. Such an intervention is much more acceptable from the European standpoint than drawing upon the capital substance of Europe's agriculture". (Id. p. 19).

3. The goal of the conspirators, as revealed in a note by Thomas concerning a pronouncement of Hitler as reported to him by Todt and confirmed by defendant KEITEL immediately before the attack upon Russia, was to secure by conquest all territories which were deemed of special economic importance to Germany.

Thus Thomas wrote:

"The progress of the war shows that we went too far in our plans of autarchy. It is impossible to attempt producing, by synthetic processes or other measures, all materials which we are lacking. For example, it is impossible to expand our fuel oil industry to such an extent that we can rely upon it completely. All plans of autarchy demand a tremendous number of men, which simply cannot be supplied. Another course must be taken and one must conquer what one needs but does not have. The supply of men which will be required for that one action, will not be as large as the supply which would be needed constantly for operating factories producing synthetic materials. Thus, the goal must be to secure, by conquest, all territories which are of special interest to us from the viewpoint of military economy".

EC 17, p. 17. Note for the files signed by THOMAS, 20 June, 1941 entitled "Aktennotiz über die Entwicklung der Rüstungslage im Sommer, 1940".

III

IN FURTHERANCE OF THEIR UNLAWFUL POLICY RUTHLESSLY TO EXPLOIT RUSSIA, THE NEZI CONSPIRATORS, IN COMPLETE DISREGARD AND VIOLATION OF THE LAWS AND CUSTOMS OF WAR, SEIZED ENORMOUS QUANTITIES OF FOOD, OIL, METALS, MINERALS, CHEMICALS AND OTHER PRODUCTS AND TRANSPORTED THEM TO GERMANY FOR USE BY THE GERMAN CIVILIAN POPULATION. THEY REMOVED TOOLS AND MACHINERY TO GERMANY FOR USE IN THE GERMAN WAR EFFORT; THEY DEPRESSED THE STANDARD OF LIVING OF THE POPULATION AND DECREASED THEIR FOOD RATIONS TO A STARVATION LEVEL; THEY EXTERMINATED PARTS OF RUSSIA'S POPULATION; THEY TOOK MEASURES TO GERMANIZE RUSSIAN AGRICULTURE AND INDUSTRY; UPON THEIR RETREAT FROM RUSSIA THEY DEVASTATED ENTIRE REGIONS BY SYSTEMATICALLY DESTROYING ALL INSTALLATIONS AND RAW MATERIALS, AND THEY FORCIBLY REMOVED COMPLETE POPULATIONS WITH THEM.

A. The Nazi Conspirators Specifically Decreed Non-Compliance with Applicable Rules and Customs of Land Warfare.

1. The defendant, ROSENBERG, decreed that:

"The regulations of the Hague Convention on Land Warfare, which concern the administration of a country occupied by a foreign belligerent power, are not applicable, since the USSR is to be considered dissolved, and therefore the Reich has the obligation of exercising all governmental and sovereign functions in the interests of the country's inhabitants. Therefore, any measures are permitted which the German administration deems necessary and suitable for the execution of this comprehensive task".

EC 347, vol. II, p. 39 of the "Green Folder". Published by Wirtschaft Führungsstab Ost, 3rd edition, 1942 and entitled "Richtlinien für die Führung der Wirtschaft in den neubesetzten Ostgebieten", ("Directives for the Operation of the Economy in the Newly-Occupied Eastern Territories").

2. In a memorandum submitted to defendant, KEITEL, 15 September, 1941, Canaris, the head of the "Amt Ausl/Abw." (Counter-Intelligence Corps, Foreign Division) criticized a draft of regulations on the treatment of Russian prisoners. The items against which Canaris specifically objected were: the view expressed in the draft that the Soviet prisoner had lost any right to be treated as an honorable soldier; the rule declaring the use of arms against Soviet prisoners as presumatively lawful, which rule Canaris stated, would lead to arbitrary killings and injuries; the proposal for the establishment of a police force in the camps equipped with sticks and whips, which, Canaris stated, runs counter to military conceptions; and the general statement in the drafted regulations suggesting even stricter actions against prisoners. Canaris stated that the treatment proposed in the regulations was unjust and that the regulations compared unfavorably with the Russian regulations on the treatment of war prisoners. He expressed the view that the theory of the regulations was contrary to the general principles of international law which, because of the non-applicability of the Geneva Convention, are alone applicable. KEITEL, however, on 23 September, 1941, wrote the following note on the memorandum:

"The doubts spring from soldierly conceptions of a chivalrous war! Here the destruction of a philosophy is involved! Therefore, I approve of the measures and assume responsibility for them".

EC 338. Secret memorandum from Amt Ausl./Abw, Berlin
15 September, 1941, to Chief, OKW.

B. In Implementation of Their Unlawful Policy of Exploitation,
the Nazi Conspirators Issued Various Directives and Decrees.

1. At a conference held on November 8, 1941, under the chairmanship of defendant, GOERING, the following steps were outlined: the low living standards of the native population were to be maintained; sufficient security forces were to be made available to ensure requisition of crops from the Kolkhozes; similarly, military and police forces were to guard the seed from consumption by the masses of persons streaming into the agricultural surplus areas; large stocks of animals were to be ruthlessly and rapidly seized in order to ease the meat situation in the Reich, and, for that purpose larger military and police forces were to be made available; the urban population should receive only very slight quantities of foodstuffs; "for the big towns (Moscow, Leningrad, Kiev,) nothing at all could be done for the time being. The consequences resulting therefrom would be hard, but unavoidable"; the food rations in the Eastland, also, should be reduced to a level lying considerably below the German level; Russian timber resources should be made available to the Reich to the greatest possible extent; machinery should be requisitioned and utilized for the German military economy; machinery for the production of tools should be hauled away at once; and, with respect to Russian oil, the following directive was laid down:

"The Russian mineral oil industry must be permanently managed solely in accordance with the interests of the Reich. The exclusive right to operate the mineral oil industry in the recently-occupied Eastern territories has therefore been permanently bestowed upon the Kontinentale Öl-AG. (Continental Oil Co.) founded for the purpose of combining all German oil interests with relation to all foreign countries".

EC 402, pp. 9 & 13. Memorandum, 20 November, 1941,
from KOERNER as representative of GOERING, setting
forth the results of a conference held 8 November, 1941,
under the chairmanship of GOERING.

Moreover, it was declared to be the will of the Führer that the Reich's burden of debt arising from the war must for the most part be covered by receipts extracted from the newly-occupied Eastern territories.

2. In a decree of the High Command, dated 19 November, 1941, the urgent necessity of collecting metals, scrap iron and other raw materials in the occupied territories for the German armament production was stressed. Factory buildings not engaged in production for the German troops or in the production of important foods, were to be stripped ruthlessly of metals.

EC 347, p. 204. Richtlinien für die Führung der Wirtschaft in den neubesetzten Ostgebieten, part II (3rd edition), 1942.

3. As part of the program of securing metal, it was ordered that church bells should be systematically seized. In May, 1942, the opinion was expressed that this program would yield 800 to 1000 tons of metal. Payment was to be made by the Reich only for the expense of removing the bells; "otherwise, the surrender of the bells is regarded by the Reich as a voluntary contribution of the population in the Eastern territory".

EC 389. Memorandum from Zimmermann to the Reichswirtschaftsministerium, May, 1942.

C. They Seized and Transported Enormous Quantities of Food and Raw Materials to Germany for Use by the German Army and Civilian Population.

1. Official German statistics show that enormous quantities of food and raw materials were shipped from the conquered Russian territory into the Reich pursuant to the unlawful policy previously formulated. During the period, 1 August, 1943, to 31 October, 1944, the following quantities, among others, were transported to the Reich: 248,167 tons of grain (rye, wheat, millet, buckwheat) of which 97,863 tons were used for the army, 150,304 tons for other purposes; 531,270 tons of fodder, (of which only 193,476 tons were used for the army); and 15,959 tons of flour products and leguminous plants, of which only 252 tons were used for the German army. Among the products removed to Germany from

the Ukraine were (during 1941-1944):

1,887,689 tons of grain,
716,743 " " oil seed,
60,788 " " beef cattle,
109,769,000 eggs, and
57,884 tons of sugar.

These amounts were in addition to the deliveries for the army.

EC 444. (Yellow folder).

As it was stated in a report by a German official, the huge quantities of raw materials bought in the Ukraine were bought at "such low prices", that it "really amounts to confiscation".

EC 320-2. Report by Captain Dr. Oberländer.

Moreover, 3,114,000 tons of iron were shipped to Germany during the period, June, 1941 - 29 February, 1944, while 1,156,265 tons of iron ore were shipped during the period, June, 1941 - 31 December, 1943.

All supplies of gold, silver and other precious metals seized in Russia, i.e. 1,429 kilograms of gold (bars and coins) 23,637 kilograms of old and fragmented gold, 85,884 kilograms of silver (bars and coins); and 73,200 kilograms of other precious metals were removed to Germany. 2,373,944 kilograms of old and fragmented silver were transported to the Reich.

EC 208. B-Buch, containing many additional statistics.

Until 30 November, 1943, a total of 2,529,281 tons of scrap iron and 30,058 tons of old metals were transported to the Reich. 3,001 tons of copper, 1,903 tons of lead were sent to Germany up to 31 October, 1943. All the supplies of boraxite seized (1,553 tons) and all supplies of phosphorites (22,369 tons) were shipped to Germany.

EC 288.

D. They Removed Tools and Machinery in Large Quantities to the Reich for Use in the German Armament Program.

Rules were laid down at an early stage of the occupation, (8 November, 1941) for the removal of machines. Machines for the

the manufacture of tools which could be utilized at once and were urgently needed for the German armament program were to be hauled away. Machines which were needed in the occupied Eastern territories for the fulfillment of the military economic tasks assigned to them were to be left in those territories.

EC 402, pp. 10 & 11.

E. They Mercilessly Depressed the Living Standards of the Population and Decreased their Food Rations to a Starvation Level.

1. GOERING, on 16 September, 1941 laid down the principle that in the occupied territories adequate food should be secured only for those individuals who worked for the Germans. He established the following order according to which the food supply was to be used: first, for the German fighting forces; then, for German troops in enemy countries; next, for the German home troops; next, for the German civilian population; and only after that would provision be made for the population in the occupied countries.

EC 31. Notes by NAGEL, dated 16 September, 1941 concerning a conference under the chairmanship of GOERING, p. 13.

A decree, November 4, 1941, established weekly ration scales, expressly described as maxima, for the civilian urban population. For example, the following were the rations for consumers not engaged in any significant work: no meat or meat products, 70 grams of fat, 1500 grams of bread, and 2000 grams of potatoes (Jews: 50% of these maxima). The grant of the rations was qualified by the proviso that the civilian population was to be fed only "insofar as this is possible without prejudice to German interests", the seizure of food for the Wehrmacht and export to Germany having absolute priority over civilian supplies. For an "initial period", rations were to be fixed "as low as possible" (i.e. below the authorized maximal scales), and it was provided that "meat and fat are not to be issued at all for the time being".

EC 347. Richtlinien für die Führung der Wirtschaft in den neubesetzten Ostgebieten, part II (3rd edition), 1942, p. 104.

2. As a result of the German policy, the population's living standard decreased enormously.

Thus, it is admitted in a German report that after a few months of German occupation, the standard of living of the Ukrainian population had deteriorated very considerably.

EC 284. Personal report by OKV Rat Seraphim, 29 November, 1941, p. 4.

In several regions up to 25% of the labor force had become unable to work because of physical exhaustion.

EC 320-2. Report by Captain Dr. Oberländer, p. 4.

F. They Took Unlawful Measures to Germanize Russian Agriculture and Industry.

1. The early plans for economic exploitation of Russia encompassed a settlement of Germans in the Eastland.

EC 402. Memorandum from KOERNER, as representative of GOERING, 20 November, 1941, concerning a conference held on 8 November, 1941, p. 5.

Preferred allocations of land were made by Germany to inhabitants of the Eastern territories who were in the service of Germany.

EC 313. Letter, 3 July, 1942, from Wirtschaftsstab Ost.
EC 315. Letter, 6 July, 1942, from Wirtschaftsstab OKW, signed 'THOMAS', giving record of conference, 4 July, 1942.

Measures were taken to destroy the existing Kolchozes system of land ownership, and it was proposed to transfer title to farmers who were considered reliable from the German point of view.

EC 279-5. Memorandum from Chefgruppe, Ernährung und Landwirtschaft to East Ministry, 12 February, 1943.

EC 279-5 (2). Note for the files of a conference, 19 February, 1943 concerning the land question.

EC 279-5. Draft of a decree of the German Reichskabinett recognizing title of the individual peasant to the land assigned to him.

2. In order to Germanize effectively the industry of the occupied territories, plans were made in May, 1942 for the appoint-

ment of a committee under the direction of the Reichswirtschaftsminister.

EC 202.

G. They Exterminated Parts of Russia's Population Systematically.

1. When in the occupied territories difficulties arose as to feeding the population in the cities, a German army official conceived the idea of concentrating in giant concentration camps the population which was of no use to the Germans, or of pushing them into the No-Man's-Land.

EC 339. Memorandum by Rittmeister Fromberg, liaison officer OKW/W1 Rd, 2 November, 1941.

2. Large-scale executions of the Jewish part of the population took place.

The executions in the Ukraine were described in a report by a German army official as follows:

"It is not provable that Jews, all or in groups, have participated in acts of sabotage... It cannot be said that the Jews as such constituted a danger to the German Wehrmacht... The Jewish population remained unmolested immediately after combat ceased. Only weeks or months later was a planned shooting of the Jews executed by especially formed units of the Orpo /"Ordnungspolizei" = police/. This operation generally proceeded from East to West. It took place entirely publicly with the help of the Ukrainian militia, often unfortunately with voluntary participation of members of the Wehrmacht. The manner of execution of these operations, which covered men and very old men, women and children of every age, was horrible. The operation was more gigantic in the mass proportions of execution, than any like measure ever taken by the Soviets. It is believed that about 150,000 to 200,000 Jews of the Ukraine were executed. Only in more recent executions were the more "useful" Jews (tradesmen) separated and kept alive. Until then these economic considerations were not kept in mind.

Summarizing, it can be said that the solution of the Jewish problem in the Ukraine was obviously prompted by principles and ideological thoughts, with the following results:

- a) Elimination of a part of the "superfluous eaters" in cities.
- b) Elimination of people who surely hated us".

EC 284. Report submitted by OKV Rat Professor Serafim, Waffeninspektion, Ukraine (Kowno), 29 November, 1941 to General THOMAS, pp. 5 & 6.

H. In Retreating from Occupied Eastern Territory, the Nazi Conspirators Systematically Destroyed Entire Regions from Which They Withdrew.

1. Detailed plans of destruction were made beforehand.

For example, an order was given by GOERING, under instructions from the Führer, 7 September, 1943, to destroy all agricultural plants in a region, and to destroy all auxiliary installations (storage facilities, warehouses, etc.)

EC 317. See also EC 38, p. 30.

2. Machinery, industrial establishments, mines, etc. were systematically destroyed according to plans. Care was taken to destroy raw material which could not be moved out of the region.

A description by a German army official thus describes the destruction in the Donez region:

"Everything which could not be taken was destroyed, especially waterworks and electric power plants, power stations and transformers, mines, factories, means of production, villages and houses".

EC 387. Essay by Militärverwaltungsrat Bender on the evacuation of enemy-occupied territories, p. 27. See also EC 209 and EC 342.

3. Pillaging and destruction of raw materials and foodstuffs.

- a. When during the retreat from Lithuania, summer, 1944, the plan to remove systematically all raw materials could not be put into operation, authorization was given to the individual army units to obtain necessary supplies (foodstuffs, textiles). The official report states that large-scale pillaging by the German troops took place.

EC 209.

- b. Raw materials and foodstuffs which could not be carried away, were destroyed by the Germans.

Grain was burned, horses and cattle were shot, skins stocked in a leather factory were destroyed with sulphuric acid, etc.

EC 387, pp. 23, 24 & 25.

EC 38, pp. 82, 83 & 84.

EC 342.

c. Approval was given to the use of a certain chemical which had the effect not only of making the grain unfit for human or animal consumption, but also of destroying its germinating capacity.

In August, 1943, an order was given to the I.G. Farben to develop a chemical which would be highly effective in small quantities, which would make grain unfit for human or animal consumption, and which would possibly also destroy its germinating capacity. The poison chemists of I.G. Farben were ordered to work out recommendations. "There was great confusion at the I.G. about the order because a similar order had never been given before". Many experiments were made. A chemical which met the specifications was developed and made available. The Führer approved its use.

EC 445

4. When retreating, the Germans systematically and forcibly took with them entire populations.

For example, in the evacuation of the Donez area, the entire population of a region was evacuated.

EC 387, pp. 27 & 28.

After having been moved from the designated localities, the masses of population were sorted according to their most useful tasks (agricultural work, work on fortifications, work in the mining industry, etc), and appropriate groups were transported to the Reich.

EC 387, pp. 28 & 29.

See also EC 38, pp. 80 & 82 for a statement in the War Diary of Wirtschaftsstab Ost that great numbers of German guards were required for effectuating such evacuations.

I. The Balance Sheet of the Economic Spoliation of Russia by the Nazi Conspirators Shows that Values Totalling many Billions RM were Obtained by the Nazis Through their Measures of Exploitation.

The monetary value of the "contributions" obtained from the Russian economy up to 31 March, 1944, was computed officially by the Germans. Agricultural deliveries were listed as totalling 4 billion RM, and the figure given for Russian deliveries of raw materials is 725 million. The German survey states expressly that the figures given are much too low since the value of only the most important food and raw material deliveries was determined, and concludes that "the contributions which cannot be assessed doubtless run into the billions".

EC 86, item 10.

III

DEFENDENTS FUNK AND SPEER SHARE RESPONSIBILITY FOR THE EXPLOITATION OF THE RUSSIAN ECONOMY SET FORTH ABOVE

A. The Defendant Funk Shares Responsibility:

1. Because of his personal participation in the original planning of the exploitation of the Russian economy;
2. On the ground that the acts of economic exploitation were done under the direction of the Industrial Division of the Wirtschaftsstab Ost and that this Division was headed by Dr. Schlotterer who had been appointed by Funk as his permanent representative;
3. Because of other measures which Funk took directly in the economic exploitation of Russia.

1. Prior to the attack on Russia, Funk participated in a discussion concerning preparations for the general measures of economic exploitation to be taken in the Eastern territories.

(1039 P.S.)

2. Funk is responsible for the acts of economic exploitation done under the direction of Dr. Schlotterer.

Under the overall supervision of the Wirtschaftsführungsstab Ost (Economic Executive Staff East), appointed by GOERING, the Wirtschaftsstab Ost was established and entrusted with the execution of the economic measures; but it was arranged that representative of the government departments involved would be united in the Wirtschaftsführungsstab Ost (EC 38, p 5.), and that the economic group would not assume the character of an independent section (1039 P.S.). Funk appointed Dr. Schlotterer (who was a Ministerialdirektor in Funk's department) his "permanent representative" and according to the arrangement Funk was to serve "as a permanent liaison officer in order to co-ordinate the political purposes with the economic necessities". (1039 P.S.). In the Economic Staff East Dr. Schlotterer was in charge of the Industrial Division (Gruppe W) which had jurisdiction over the following matters: "industrial economy; including raw materials, and public utilities; forestry; finance and banking; enemy property, trade and commodities. (EC 452, p. 7. Richtlinien für die Führung der Wirtschaft in den neubesetzten Ostgebieten, Part I (2nd edition), July, 1941; Directives for the Operation for the Economy of the Newly-occupied Eastern Territories). (See also 1039 P.S. and EC 38, p. 5)

The extensive part which continued to be played by Funk's Reichswirtschaftsministerium appears from the fact that "the individual members of the Eastern economic organizations tended to secure ever-increasing participation by their regular government departments" in the work of economic exploitation of the East, so that Berlin became the "center of gravity of economic direction in the East... This is evidenced by the fact that, as the first of the group, the Industrial Division of the Economic Staff was transferred to Berlin".

EC 162. Chef W1 Stab Ost also Organisationsform in den ersten 7 Monaten (Organization of the Economic Staff East)

The Wirtschaftstab Ost was transferred to Berlin "in order to establish better contacts with the government departments and to prevent the Reichsminister Ost from setting up a Reichs Wirtschaftsministerium of his own".

EC 38, p. 42.

3. Funk, who was kept advised officially of the plan of economic spoliation and of specific measures taken (EC 402; 342 (Report concerning evacuation measures)), took direct action in the economic exploitation of Russia. Both a government corporation charged with the operation of the Russian coal and iron industries and iron ore mining, and a corporation entrusted with the operation of the Russian textile and fabric industries were established in July, 1941 "upon the proposal of the Reichswirtschaftsminister" (EC 347, p. 17). And in July, 1942, a government financing corporation, which had the function of "preparing the way for the Germanization of the Russian industry, was established "upon the initiative of the Reichswirtschaftsminister". (EC 38, p. 35).

B. The Defendant Speer Shares Responsibility:

In addition to his responsibility as head, since February, 1942, of the Ministry of Armaments and Munitions (renamed "Ministry of Armament and War Production" in September, 1943) Speer is responsible for the reason that he was the executive officer of the Wirtschaftsführungsstab Ost (economic executive staff East) to which GOERING had delegated the task, assigned to him by Hitler, of an overall supervision of the economic administration in the East.

EC 17, p. 20.

FOOTNOTE: The exploitation of Russian labor and Speer's responsibility therefor are not discussed in this brief.