

avoid any loss in production." Wilhelm Koehler, Tr. p. 8061. It consisted of eleven rooms, each of which measuring 3.30 by 8 meters, except a so-called day room, which measured 6.6 x 8 meters. Eight of the smaller rooms were bedrooms, one was a combination guard room and shoe repair shop and the last was a toilet and wash room. It was built to accomodate fifty women and each bedroom was equipped with four double beds and four stools, DX 2274 Lehm 224, Ek. 17, p. 16. It is first reported as occupied in January 1944. Fifty women were then living in it, DX 2060, Kpk 241, pp. 158, 166. The camp was destroyed in March 1944 (DX 1022 Lehm 99. Ek. 16, pp. 25, 27) but the women continued to be quartered there DX 1022 supra. In June 1944 "when the firm issued the instructions to move the smaller camps for the foreigners outside the city limits of Essen" and a thousand workers were moved to Voerde, the number confined in Armor Construction 4 rose from 50 to 72, including 12 men.

In July 1944, 110 people both men and women were living in the camps eight rooms, in August, 96, in September 97. (Kpk.241, Bk. 4-A, p. 174, 175, 177) They included three or four families (Wilhelm Koehler, Tr.p. 8062). Women gave birth there with only the camp leader as mid-wife. (Tr.p. 8066, DX 1022, Lehm. 99, Bk. 16, p.25, DX 2278, Lehm. 450, Bk. 16, p.46) and their babies were added to the teeming mass. (DX 2275, Lehm. 565, Bk. 16, p. 34, 37). There is nothing to indicate that the original furnishings were ever supplemented. The affiant who was charged with furnishing the camps says only, "After the air raids which followed later on this barrack was partly destroyed so that more people had to be put into the rooms." (DX 2274, Lehm. 224, Bk. 16, p.33). The air raids also apparently destroyed what little washing facilities the camp afforded. (DX 2273, Lehm. 98, Bk. 16, p.21). One witness conceded that two girls may have shared one bed. (Tr.p. 8077). The total picture of squalor which emerges from the defense's own documents is unimaginable, 110 people including men, women, married families, babies, living in eight small rooms, without washing facilities, a few yards away from noisy factory, and sharing thirty-two double beds among them. Yet two affiants have the temerity to describe the camps as a "model camp" (DX 2276, Lehm. 480, Bk. 16, p. 40; DX 2277, Lehm. 446, Bk. 16, p.43). The lives of the workers were in constant jeopardy. Although the camp was destroyed four times between March 1944 and the end of the war (DX 1022, Lehm. 99, Bk. 16, p. 25, 27), the Eastern workers were kept in it until the collapse (DX 2276, Lehm. 480, Bk. 16, pp. 40, 42), because the plant management wished to be certain "that the foreign workers were at their working places for the duration of all shifts. Our experiences with foreigners who were outside the Gusstahlfabrik had been rather discouraging." (DX 1022, Lehm. 99, Bk. 16, pp. 25, 26).

Most of the facts as to Armor Construction are derived from the Lehmann Document Book 16. As the analysis indicates conditions were so incredibly bad at that camp that they are revealed even by the affidavits, dishonest and contradictory as they are.

Lehmann Document Book 16 is only one of several introduced on the subject of foreign workers camps. Ihn 11 is devoted, in part, and Ihn 16, Kupke 2a and 2b entirely to affidavits and documents pertaining to the camps. The documents insofar as they are relevant reinforce the evidence presented in the prosecutions in/ case chief. The two Ihn document books, however, contain a number of documents which by their dates disclose their irrelevancy to the issue before this court.

Compulsory foreign labor was first employed in Essen in large numbers in 1942. In March of that year the first Eastern workers arrived. Not until June 1942 did their number reach a thousand. March 1942 was also the first month in which more than 2,000 foreign workers were employed in Essen. By June the total had reached 7,748, (DX 932, Ihn 130, Bk. 12, Annex 7). Until June 1943 the Krupp hostels were inhabited either by Germans or by foreign labor who had come to Germany when some pretense of volition was maintained.

Until the necessity for accommodating the thousands of slave laborers brought into Essen in 1942 arose the administration of camps and hostels was a comparatively unimportant matter. (See Final plea on behalf of Loeser, p. 72 - 73) Documents relating either to the attitude of the firm or conditions in the camps prior to the vast influx started in June 1942 are clearly not relevant. The documents in Ihn Book XI, for the most part, are dated prior to June 1942.

In Ihn Book 16, which is entirely devoted to a refutation of the survey made in 1942 of Eastern workers camps referred to earlier (PX 577, NI 3013, Bk. 18, p. 206), the defense has included a report on Seumannstrasse made on 24 January 1942.. A

report written two months before the first Russians arrived at Essen, six months before they came in large numbers and eleven months before the inspection at which the over-crowding of the Eastern workers was criticized is clearly irrelevant. It has been physically impossible to call all the affiants on the Kupke books who have given affidavits on housing. The few who have been cross-examined, however, indicate the lack of reliability of these affidavits. Reference has already been made to one of these affiants, Rudolf Schulz. Erich Risch's testimony is equally unreliable. This witness who joined the Nazi Party in 1933 and testified that he had visited the Humboldtstrasse camp after the air raid in October 1944 to reconstruct it professed complete ignorance of who occupied it, even today, and in fact, asserted that only French civilian workers lived there (Tr. 11152 - 11153). He also testified that he entered the camp without difficulty. (Tr. 11154 - 11155). The following day, on redirect, he altered his testimony and suddenly recollected that he had had a dispute with a guard before he was permitted to enter (Tr. 11354). However, he failed to explain the presence of a guard in view of his testimony the previous day that the camp was occupied by French civilian workers.

Heinrich Huelsewiesche, another affiant (DX 1844, Kpk, 70, Bk. II A, p. 193) was a plumber who swore in his affidavit that "In each camp sufficient toilet facilities were provided." Upon examination he admitted that he was familiar with only five camps, that he did not know how many people those camps held, that "as the camps extended later on, more people were brought into them and the facilities were no longer adequate" and that he was never asked to install additional facilities in any camp. (Tr. 11319 - 11340).

Paul Endrulat who had given an affidavit (DX 1843, Kpk. 69, Bk. 2 A, p. 189) in which he described the cleanliness, adequacy and comfort of the living quarters in the camps in detail, upon cross examination admitted that he had been in Kraemerplatz only once, that his "entire affidavit referred" only to the very limited field of fire fighting" and that he did not wish to give "an opinion about the comforts and the general condition and sanitary facilities in the camps". (Tr. 11374 - 11375).

8. (b) Air Raid Shelters

The foreign workers' "camps were without exception in the areas which were most affected." (DX 1828, Kpk.53, Bk.11A, pp. 72,73). Yet, Eastern workers were given as little protection against airraids as the prisoners of war. The evidence in the record is particularly clear as to Kraemerplatz. Eugen Lauffer, who was chairman of the Krupp Housing Administration, swore in an affidavit that Krupp endeavored to provide "at least the same shelter for the inmates of these camps, insofar as it was possible, as the German civilian population had". (DX 1828, Kpk 53, Bk. 2A, p.72). The value of this sweeping generalization was revealed on cross examination. The witness testified that the civilian workers at Kraemerplatz had, as airraid protection, so long as the camp existed, the slit trenches used by the prisoners of war and the cellar of a small school building which would accommodate approximately 150, (Tr. pp. 11473-11474). Although the witness refused to state the number of people the slit trench would hold, the evidence relating to the Kraemerplatz camp, discussed under the heading "Prisoners of War" in this brief, shows that the slit trenches in this camp could accommodate only from 200 to 250 persons, (PX 918, NIK-9779, Bk.36, p.68). In January 1943 the Kraemerplatz camp housed 1,250 people, (DX 2024, Kpk 206, Bk. 3D, p.14). While the Eastern workers were left almost entirely without protection from airraids, the German workers quartered at Seumannstrasse were provided with a solidly built dugout in addition to the protection afforded by the basement of the building (Tr. p.11476). Fritz Fuehrer, during the course of his examination, certified that he had not considered the slit trenches at Kraemerplatz adequate and that "with the support and help of Herr Kupke, with

whom I discussed the matter, we built a very good tunnel" (Tr.p.8301). The testimony is in direct conflict with that given by Lauffer. Friedrich Altmann did not include Kraemerplatz in his collection of camps for which "budget estimates for building air-raid shelters existed" (Tr.p.10784; DX 1805, Kpk.71,Bk.2B). The description of the Kraemerplatz camp contained in the record of transfer on 3 May 1943 includes three slit trenches but no mention is made of any tunnel (DX 1831, Kpk 56, Bk.2A,pp.80,111). Moreover, Fritz Fuehrer cannot be believed since he lied blatantly on another issue. He stated the normal or average strength of the camp to be 800 (Tr.p. 8296). The documents show that, on 30 November 1942, it housed 1,172 persons, on 18 January 1943, 1,250 persons and on 21 December 1943, 1,201 persons (DX 2022, Kpk 204, Bk.3D,p.8; DX 2024, Kpk 206, Bk.3D,p.14; DX 2026, Kpk.208,Bk.3D,p.20). The failure of the Krupp firm to provide foreign workers with air raid shelters is conclusively established by another exhibit submitted by the Defense which shows the layout of eighteen workers' camps (DX 1805,Kpk 71,Bk.2B). This document was prepared by Friedrich Altmann who, on cross examination, testified that he had selected only those camps for which expenditures for air raid protection had been recorded. "For these eighteen camps I found the costs for the erection of air-raid shelters. In the other accounts I could not find anything about air raid shelters." (Tr.10781). At Seumannstrasse, which was the Krupp bachelor home, air raid shelters were installed in 1942. However, no expenditures whatsoever for air raid shelters are shown for Spenlestrasse, which housed 1,419 Eastern workers in January 1943; for Germaniastrasse, which housed 823 and the only expenditure shown for Heegstrasse, which accommodated 1,195 persons, were made subsequent to the

airraid in 1943 which destroyed seventy-two percent of the camp (DX 2024, Kpk 206, Bk. 111D, p. 14). The character of the protection at Dechenschule, which housed 454 Eastern workers in 1943, is described elsewhere in this brief.

The inevitable result of their lack of protection was the death of many of the Eastern workers. Scheider states in his affidavit,

"I myself then took over the Eastern workers' camp in Heegstrasse, and was in charge of this for approximately nine months. During that time, the camp was partially bombed on four occasions and finally totally destroyed. During the last raid, there were 30 to 35 fatal casualties and 120 to 150 persons were injured". (DX 1627, v.B.256, Bk. 13, p. 69).

The Annual Report for 1942-1943, issued by Kupke's department, notes that 281 camp inmates had been killed to date (DX 2139, Kpk. 354, Bk. 6A, pp. 23, 29). The report for the following year records the death of 72 (DX 2140, Kpk. 355, Bk. 6A, pp. 33, 34). While all those killed were not Eastern workers, it is a fair presumption that since they were by far the largest group of camp inmates and the least protected, their casualties were the highest.

The defense has stressed the fact that, in 1944, many of the foreign workers in Essen were moved outside the city to protect them from air raids, and has even suggested that this gave them preference over the Germans who were not free to leave Essen. The argument rests on several false assumptions. Twice as many Eastern workers as were moved out of town were kept in camps inside the Gusstahlfabrik and within the town of Essen until the end of the war. No Eastern worker was moved until June 1944. It should not be forgotten that the Eastern workers were prisoners to be moved as suited their

captors, whereas the German worker was free to make whatever provision he deemed desirable for himself and his family. The medical reports show Voerde in operation for the first time in June 1944 (DX 2060, Kpk 241, Bk.4A, pp. 158,171). In August 1944 approximately a thousand Eastern workers lived in Voerde. An equal number lived at Luescherhof, a camp within the premises of the Gusstahlfabrik, and in camps attached directly to the plants in which they worked, as, for example, Machine Construction 10, Mechanical Workshop 2 and Armor Construction 4 and another thousand lived at Rabenhorst and Frintrop Ost, both within the city limits (DX 2060, Kpk 241, Bk. 4A, pp. 158, 175; PX 1376, NIK 4162, Bk.32A, p.2). The Eastern workers, far from being moved away from Essen in consequence of the air raids, were moved closer and closer to the area of danger. Quartered within the very premises of the Gusstahlfabrik, they were a perpetual target for the increasingly severe air raids.

(c) Food

The food of the Eastern workers, like their camps, was bad long before enemy action affected supplies. The basic rations of the Eastern workers were always smaller than those of German or other foreign labor; they were not eligible for supplemental rations for long or night shifts; when they were granted supplemental rations, on special application, for heavy or very heavy work, these rations were smaller than those given Germans. (PX. 971, NIK-10755, Bk. 35, p. 28; Px. 1248, NIK-8283, Bk. 44, pp. 27, 31).

The food of the Eastern workers was the same as that given the Russian prisoners of war. The evidence as to the inadequacy of these rations, discussed in connection with the Russian prisoners of war, is equally applicable to the Eastern workers. The documents relating to both groups reflect a parallel story of initial protests by the plant managers as to the inadequacy of the diet, steady deterioration of the health of the Eastern workers culminating in oedema, disease and death in the winter of 1942-1943, followed by a slight improvement which still left their rations lower than that of an other "free" foreign worker .

In 1942, before time had inured them to the suffering of fellow human beings, many of the Krupp employees protested against the slow starvation of the Russian civilians.

Memoranda were sent to Ihnand Beusch from the Locomotive (Lowa) and the Motor Vehicle (Krawa) plants, pointing out that the food was insufficient to preserve the strength of the Russians.

On the fourteenth of March 1942 a memorandum on the letter-head of Machine Shop 8, one of the gun equipment workshops, was addressed to Hype, the head of the Lowa, and forwarded

to Beusch and Ihn which stated, in part,

"We have ascertained during the last few days that the food of the Russian workers here is so pitifully bad that they are getting weaker and weaker every day***. Conditions are exactly the same at all other places where Russians are employed ***. It seems, therefore, appropriate for you to take the necessary steps via the firm in order to clear up this matter."

(Px. 987, NI-3991, Bk. 36, p. 4).

One week later Hupe again forwarded to Beusch another protest.

This one originated from another part of Iowa, the locomotive workshop,

"The quality of the food for the night shift, however, leaves much to be desired. The Russians have often been given a rather watery soup which they refused on the 13th and 17th of March. The manageress of the kitchen Weidkampstr., Miss Block, says that better meals cannot be provided with the rations at her disposal ***. As the Russians state, themselves, they are quite willing to get more work done but are too weak to do so".

(Px. 900, NI-3922, Bk. 36, p. 7).

Similar protests were being made by the Motor Vehicle Works.

(Krawa) Grollius, a member of the SS who had been assigned as a guard to the Russian civilians, in that plant addressed the following memorandum to his immediate superior on 18 March 1942:

"I got the food in the evening after Mr. Balz telephoned, but I had quite a struggle with the people before I got anything at all. They always told me that the people had already received the day's rations and there wasn't any more. What the gentlemen understand under a day's ration is a complete puzzle to me. The food as a whole was a puzzle too, because they ladled me out the thinnest of any already watery soup. It was literally water with a handful of turnips and it looked as if it were washing up water. *

"Please tell Mr. Balz again definitely so that the matter is finally cleared up, that it cannot continue having people perish here at work. The people have to work for us here. Good, but care must be taken to see that they get at least the bare necessities. I have seen a few figures in the camp and a cold shudder actually ran up and down my spine".

(Px. 898, D-310, Bk. 36, p. 5).

This memorandum was forwarded to Ihn and Beusch with a covering note by an official of the Motor Vehicle Works. This covering note bears a pencil notation that "the food for the Russian civilians on night shift on 19/20th March was forgotten. Foreman Grollius therefore refused to bring these people to work. Only then did they receive their food".

The note explains that the plant manager had tried in vain to cure the situation himself by having the Deputy Works Manager discuss the matter with the Camp Commandant of the Kraemerplatz but that the Werkschutz, which was then in charge of the Eastern workers' camp, had advised the plant manager of the proper attitude to be taken toward the Russians,

"Mr. Hassel from the Works Police, who was present at the time, butted in and declared that one should not believe what the people said. Also, that one was dealing with Bolsheviks and they ought to have beatings substituted for food".

(Px. 899, D-318, Bk. 36, p. 6).

Apparently Hassel's advice prevailed since on 9 September 1942 the head of the Krupp hospitals, Dr. Wiele, reported to Ihn and Loeser that, "the food supplied to the Eastern workers has been and still is insufficient. The plant managers often need two Russians to do the work of one strong normal worker". (Px. 903, NIK-5808, Bk. 36, p. 13).

In December 1942 the same doctor noted that while in August 1942 only one German, despite the food condition, suffered from hunger oedema, nineteen Eastern workers were so affected. (Px. 909, NIK-6720, Bk. 36, p. 32; Px. 910, NIK- 6717, Bk. 36, p. 37).

On 12 December 1942 an Eastern worker who had been in Essen for five months died of starvation in a Krupp plant. This was reported to Ihn, Beusch and von Buelow. (Px. 968, NIK-9301, Bk. 35, p. 12). A survey made on 7 May 1943 of the deaths of fifty-four Eastern workers at a Krupp hospital showed that four-fifths had died of tuberculosis and malnutrition. (Ex. 911, D-283, Bk. 36, p. 42).

In 1943 the rations of the Eastern workers, like those of the Russian prisoners of war, were raised, but until the end of the

war they remained totally inadequate.

Fritz Fuehrer testified,

"A. At first the inmates of the Dechenschule camp, as I said yesterday, received by order of Herr Hassel the normal food for Eastern workers, but later on they were given the Western rations with all additional rations and that was very good.

Q. That is not quite what I asked you. I asked you what was the matter with the food in your opinion that made you think it was insufficient, was it the quantity or the quality?

A. The people complained that they had not enough and they were never satisfied with the meal. They were hungry immediately. They didn't receive sufficient bread and their noon meal was not sufficiently large.

Q. In what respect was it insufficient, witness?

A. As I said there just wasn't enough of it.

Q. Well, of what did it consist?

A. It was a soup, a sort of stew with potatoes in it and some other similar food, noodles or whatever was available according to the rations we received; it was all cooked together.

Q. Well, you said that they complained about it, but you, yourself, thought that the complaints were well founded, didn't you?

A. Yes, your Honor." (Tr. p. 8307).

Fuehrer's testimony is corroborated by that of Dietrich Fries, whose affidavit stated that "The food supply for the Eastern workers was entirely adequate" (DX 2032, Kpk 214, Bk. 3 D, p. 67) but who reluctantly admitted the contrary under cross examination. He was asked, "Do you think this was enough to keep a person adequately fed, whether they wanted more or not? Do you think it was enough?" He answered, "No, it was not sufficient to

permit them to work" (Tr. p. 11756). He repeated, "The Eastern worker didn't have enough" (Tr. p. 11757). His testimony on this point is significant since, except for a month at Kraemerplatz in 1942 and a short period at Seumannstrasse and Frintrop-
perstrasse in 1943 his entire experience in Eastern workers' camps had been gathered in the kitchen of Camp Voerde from June 1944, the period when the rations were allegedly at their highest.

The examination of Dietrich Fries also brought out that the inmates of the camp at Voerde, like the Hungarian Jewesses and the Belgians at the Special camp of the Gestapo, were forced to work all day without any food. They received their so-called "noon" meal only at night when they returned to Voerde (Tr. p. 11762).

The Defense has introduced a great deal of evidence to meet the proof taken from the files of the Krupp firm that the food given the Russian workers was completely inadequate and has advanced a wide variety of defenses.

The defenses, for the most part, are the same as those put forward in connection with the diet of the prisoners of war which are answered elsewhere in this brief. It seems desirable, however, to discuss two points upon which the defense place some reliance. The first is the purchase of food stuffs for the plant canteens on the black market, which it is stated was undertaken "to improve the insufficient food of their workers, particularly their foreign labor" (DX 713, Iln 191, Bk. 10, p. 31). As the contemporaneous documents show, the food was purchased for sale in the "plant canteen for our (Krupp's) German employees", not for distribution to the community kitchens which fed the foreign workers (DX 848, Iln 38, Bk. 10, pp. 40, 41).

Regard for the foreign workers, therefore, could not possibly have motivated it.

The defense also relies on a comparative survey of the weights of German and Eastern workers made by Dr. Wiele in November 1943 which showed that the weight of the German workers remained steady while the Eastern workers gained. Dr. Wiele raises the question in this report as to "why just the Eastern workers should be so much better fed than the German population" and concludes that it was due to their greater peace of mind. (DX 745, Iln 24, Bk. 8, p. 83). The objectivity of Dr. Wiele, who had at one time been a physician to the SA, is open to question. (Tr. 9847) The increased weight of the Eastern workers, who, despite their gain, were no heavier than the German workers, was probably due to the fact that the period chosen for comparison, October 1942, was the time when rations were lowest. The improvement in the rations in 1943 led the Eastern workers to recover some of the weight they had lost in 1942. Dr. Wiele belies his scientific training by concluding that, since the Russian worker in 1943 was better off than in 1942, he likewise was better off than the German worker. There is no need for this tribunal to perpetuate this error.

(d) Voerde.

In the presentation of the prosecution's case one of the most poignant documents was that showing the high infant mortality rate at Camp Voerde where a special camp for babies of Eastern workers had been established. The few figures concealed a vast quantity of anguish. These were the smallest, the youngest and the most pitiful victims of the German slave system.

One witness testified as to the conditions responsible for these deaths which he ascribed to malnutrition (Tr. 4319 - 4322). The death certificates which attributed forty-nine of the total of deaths to "General Weakness" corroborated and confirmed his testimony as to the reasons for the death of these infants.

The evidence which the defense has introduced to meet this proof has been characterized more than any other aspect of the case by dishonesty and callousness. The servant girl, under whose tender ministrations three out of four babies died, self-righteously asserts from the witness stand that she is a mother herself and that the babies were given sufficient food. (Tr. 10689).

A medical expert, four years after the event in question, is able, simply by an examination of the death certificates and upon the basis of some conversations with Dr. Jaeger, to swear categorically that the physician who identified the deaths as due to general weakness was mistaken and that they were due, in fact, to a form of diarrhoea prevalent among new-born inmates, referred to as "Disease of the Yellow Excrement." This expert goes even further than simply identifying the nature of the sickness from the death certificates. He testifies that the food the children received was adequate and that they were well taken care of (Tr. 9540 - 9547). His testimony is in direct contradiction with the documentary

evidence. The unimpeachable evidence of the contemporaneous documents show that Camp Voerde was not an infants' home, but an infants' mortuary. The records of the Main Camp Administration for the year 1943 introduced by the defense in this proceeding show that, as of January 1943, 132 infants had been received at Camp Voerde (DX 2140, Kpk. 355, Bk. 6A, pp. 33, 36). Ninety two arrived in three transports from Essen in May, August and October 1944 (DX 2094, Kpk..275, BK. 4C, pp. 3, 4). The camp was evacuated in February 1945. Of the 132 infants received at Voerde 98 died, or three out of every four. According to a compilation from the register of deaths at the Registry's Office at Voerde, 88 children died at the children's camp at Voerde during the period of August 1944 to March 1945 (PX 921, NIK 12922, Bk. 36, Supp.). Reports of the Main Camp Administration show that an additional 10 died in hospitals to which they were transferred from Voerde (PX 1549, NI 2916, R.Bk. 2B, Supp., p. 33 et seq.; PX 1600, NIK 13957, R.Bk. 3, p. 107 et seq.). According to these combined reports there were 4 deaths in August 1944; 8 in September 1944; 26 in October 1944, 20 in November 1944; 17 in December 1944; 14 in January 1945 and 9 in February 1945 when the camp was evacuated. The cause of death shown in the reports of the Krupp Main Camp Administration included inter alia 40 cases of death due to general weakness or cachexy; 19 cases of pneumonia; 8 cases of tuberculosis; 9 cases of diphtheria; 7 cases of rickets and 6 cases of nutritional disturbances.

The evidence submitted by the defense to explain these deaths is hopelessly irreconcilable. According to the affidavits and testimony of persons familiar with Arnold House, all the children shipped to Voerde from the Arnold House were in good physical condition and were evacuated only because of the constant air raids (DX 2093, Kpk. 274, Bk. 4C, pp. 1,

3; DX 2094, Kpk 275, Bk. 4C, p. 3; Tr. pp. 10825, 10826). Other affiants and witnesses swear that the children after their arrival were in such bad physical condition that they were not expected to survive (DX 2103, Kpk. 284, Bk. 4C, pp 23-25; DX 2105, Kpk. 286, Bk. 4C, pp. 31, 33). Still others recall only that one transport arrived with bad sores, but otherwise healthy. The sores were treated and were not responsible for the high mortality (DX 2101, Kpk. 282, Bk. 4C, pp. 14-16; Testimony of Anna Doering, Tr. p. 10694; DX 2104, Kpk. 285, Bk. 4C, pp. 28, 29; Testimony of Gustav Podehl, Tr. pp. 10931, 10932, 10937).

There is equal conflict on the causes of the deaths. They are attributed variously to the original bad state of health of the children, to a high incidence of tuberculosis and to a diphtheria epidemic (DX 2100, Kpk. 281, Bk. 4C, p. 12; DX 2101, Kpk 282, Bk. 4C, p. 14-17; DX 2102, Kpk 283, Bk. 4C, pp. 19 - 20; DX 2103, Kpk 284, Bk. 4C, pp. 23, 25, 26).

These various explanations find as little support in the evidence as Dr. Niedelmann's diagnosis four years later of an epidemic of diarrhoea. The death certificates very clearly demonstrate that there was no single epidemic which could have caused the large number of deaths attributed to general weakness; that these deaths were scattered through the months of October, November and December 1944. Moreover, none of the many affiants who visited or worked at the camp attribute the deaths to an epidemic of dysentery or diarrhoea. Anna Doering, who was in charge of the camp from the middle of 1944 until its dissolution (DX 2102, Kpk 282, Bk. 4C, p. 14) testified unequivocally that there had been no epidemic of this disease, and that the few diarrhoea cases which did occur yielded readily to treatment (Tr. p. 10693). Lastly, Dr. Niedelmann's statement that the children were adequately nourished is flatly contradicted by the seven deaths due to

rickets, which even four years later cannot be confused with diarrhoea.

The lies and contradictions of defense witnesses are the inevitable result of the fact that there is no explanation which can acquit Krupp of criminal negligence in the administration of a camp in which three out of every four infants brought there died. Regardless of what the deaths are attributed to, epidemics, malnutrition, or arrival in bad condition, the responsibility of Krupp remains unchanged. The undisputable fact that ninety eight babies died refutes the lie inherent in any claim of adequate nourishment or good care.

5. Denial of Human Rights

In a variety of ways, the Eastern workers were denied the most elementary human rights. Ihn admits, in an affidavit, that "From the time of the arrival of Russians toward the end of 1941 until about 1943 they were forbidden to write or receive letters". (PX 971, NIK-10755, Bk 35, pp.28, 29). This prohibition was relaxed somewhat in 1943 when they were permitted to write letters for delivery within the Reich and to send form post cards to Russia twice a month. (PX 969, NIK-9206, Bk 35, p.13; PX 970, NIK-11752, DB 35, pp.26, 27). In 1944, however, Krupp connived with the Gestapo at the destruction, unknown to the Russians and Poles, of from a fourth to two thirds of both the incoming and outgoing mail. Twice a week all mail was turned over to the Gestapo to be burned. (PX 1258, NIK-10751, Bk 44, p.60; PX 1257, NIK-10750, Bk 44, p.58).

Russian workers were compelled to wear at all times a badge "Ost" and Polish workers a "P" so that they could be distinguished. (DX 1576, vB 279, DB 13, p.27, DX 1572, vB 290, Bk 13, p.5, DX 685, Ihn 118, Bk 9, p.53, DX 1570, vB 118, DB 13-A, p.14a, DX 1583, vB 297, Bk 13, p.50, DX 1714, Kpk 18, Ek 1, p.86). Failure to wear these identifying insignia was a matter for punishment. (PX 1083, NIK-13848, Bk 34-A, p.27).

Mothers were separated from their children without compunction. Babies born to Russian women were kept at Voerde, while the mothers were confined elsewhere. One woman upon being transferred