E. FRITZ GAJEWSKI

1. Charges in the Indictment. The defendant GAJEWSKI is indicted under Count I (Crimes against Peace), Count II (Plunder and Spoliation constituting War Crimes), Count III (Slave Labor constituting War Crimes and Crimes against Humanity), and Count V (Conspiracy to commit Crimes against Peace).

2. General Nature of the Evidence Supporting These Charges.

(a) As a Sparte leader, member of the Central Committee of the Verstand, and as deputy chief of the Technical Committee (TEA), GAJEWSKI bears a major responsibility for the activities of Farben and of the Economic Group Chemical Industry during the period from 1933 to 1945. Through the instrumentality of Farben, and through the positions which he held in the financial, industrial, economic and political life of Germany, GAJEWSKI bears a major responsibility for preparing Germany for aggression and for participating in this aggression once it had begun; for participating in reaping the spoils of this aggression through the plunder and spoliation of the chemical industries of occupied countries; and for participating in the illegal use and mistreatment of foreign workers and prisoners of war as slaves and in the murderous use of the inmates of concentration camps as tools in the furtherance of the German war effort.

(b) These charges against the defendant GAJEWSKI are proven beyond any reasonable doubt by the evidence which has been introduced in this case. This evidence is summarized in Parts I through VI of this Final Brief (including the Preliminary Memorandum Brief which is made a part hereof). A summary of specific activities contained in this section of the brief relating specifically to the defendant GAJEWSKI sets forth certain selected highlights in the activities of the defendant GAJEWSKI and shows the general nature of the broad field of activity in which he was engaged during the period 1933 to 1945. These specific instances