

11 September 1945

62,03
Revised Down

Rough Draft of Portions of Proposed Indictment

1. The attached pages are merely working drafts of various segments of the Indictment. The segments have for the most part not been edited or checked, nor has any attempt been made to integrate them or to cast them in proper style for an Indictment.

2. As we now conceive it, the Indictment will fall into the parts set forth below. Opposite each part appears a reference to the pertinent section of the attached draft:

- (a) Introductory recitals -- Draft "A", paragraphs 1-4.
- (b) Designation of defendants -- Draft "A", paragraphs 5-6.
- (c) Aims of the conspiracy -- Draft "A", paragraph 8.
- (d) Means which the conspirators were prepared to use -- Draft "A", paragraph 9.
- (e) Ideological pattern -- Draft "A", paragraph 10.
- (f) Conspirators' seizure of power -- Draft "A", paragraphs 11 - 12.
- (g) Steps taken to accomplish the first aim of the conspiracy, viz. totalitarian control of Germany -- Draft "A", paragraphs 13-19 and 22.
- (h) Total control of the economy as preparation for the accomplishment of the ultimate aggressive aims of the conspiracy -- Draft "B".
- (i) Steps -- military, economic and diplomatic -- taken to accomplish the ultimate aggressive aims of the conspiracy -- Draft "C", to be enlarged by the inclusion of paragraph 20 of Draft "A", and of further economic material.
- (j) Battlefield and occupation atrocities and crimes committed in the course of the war -- Draft "D", probably to be enlarged by the inclusion of more material on economic spoliation.
- (k) Participation of the named defendants in the planning and execution of the conspiracy -- Draft "E". (As to some defendants more than one draft of statement are included. In no case is it to be assumed that we have at hand this moment the evidence required to prove all the matters charged against the defendant. All the statements are in very tentative form.)
- (l) Participation of the named organizations in the planning and execution of the conspiracy -- Draft "F". (It is not to be assumed that we have at hand at this moment the evidence required to prove all the matters alleged.)
- (m) Formal charges -- not yet written.