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Toney, November 25, 2000

Affidavit Concerning Differences of two Version of my Expert Report

I, Germar Scheerer, am the author of the work "Gutachten über die Bildung und Nachweisbarkeit von Cyanidverbindungen in den 'Gaskammern' von Auschwitz" (Expertise about the formation and detectability of cyanide compounds in the 'gas chambers' of Auschwitz) which I distributed in several version during 1992 and 1993. In April 1993, Major-General O.E. Remer added a preface and an epilog to the November 1992 version of this work without my knowledge or consent and published it in April 1993. In 1995 the German District Court Stuttgart ordered the seizure and destruction of all copies of Remer's publication as well as all paraphernalia used in the preparation of it. This included my original report, which the Police had confiscated.

In July 1993, a slightly updated version of my report was published by Rüdiger Kammerer and Armin Solms (pseudonyms) with Cromwell Press in London. In 1997, this publication as well was ordered seized and destroyed by County Court Böblingen, Ref. 9(8) Gs 228/97.

The contents of the pages 3-114 of this version of my report is almost identical to the Nov. 1992 version published by Remer in April 1993 (therein also pages 3-114).

The following list includes the differences between both versions. However, I did not include changes in page breaks, footnote, endnote, chapter, or table numbers or additional scientific sources given in chapter 8 of the July 1993 version, as this would amplify the list without providing additional information. Where the page numbers are different in both versions, the first one refers to the version July 93, the second to the version Nov. 1992. Text not included in the other version is underlined.

Page	Version July 1993 (=Damon Translation)	Version Nov. 1992 (German)
4	[added chapters 3.4.2.2. and 3.4.2.3.]	[not included]
26	[Endnote [54]]	[as footnote "*" on same page]
32	Pressac publishes a photo of the alleged foundation wall remains of Farmhouse II [71]. <u>According to analyses of Allied aerial photos, a building is only present at times in the vicinity of the locale attested to be that of Farmhouse II, and there is no trace of Farmhouse I [54, 72]. At the time the aerial photos were taken, the annihilation of the Hungarian Jews is supposed to have been running at full speed, with many thousands of victims daily and thick, smoky cremations in large, open pits precisely in the analyzed area [73]. There is no trace of large incineration pits, large stocks of fuel or thickly smoking fires. Only after the liberation by the Soviets are there graves west of Crematorium III, apparently for the victims of the chaotic conditions in the camp at the time of the retreat of the German Army.</u>	Pressac publishes a photo of the alleged foundation wall remains of Farmhouse II [70]. <u>The result of an air photo analysis of the above mentioned allied air photo from Aug. 25, 1944, which was recently prepared, is that neither buildings nor ditches or hills of excavated earth were present in the area under consideration. The only thing that could be noticed were shapes of 4x10 m of either foundation or filled-in ditches[71]. At the time the aerial photos were taken, the annihilation of the Hungarian Jews is supposed to have been running at full speed, with many thousands of victims daily and thick, smoky cremations in large, open pits precisely in the analyzed area [72]. Not a trace of all of this can be found. The flat shapes discovered may be the foundations shown by Pressac. Perhaps this is the new section of the camp which was never finished, or the remainders of much older buildings.</u>
36	<u>In the meantime, two studies of the aerial photos made by the Allies have revealed that at no point in time in the summer and autumn of 1944 in the camp or in its environs are large incineration pits and fuel stockpiles necessary for that to be seen, let alone flames and smoke, as they are repeatedly attested to [54,72].</u>	[not included]

57	<u>Assuming an increasing breathing volume with increasing shortness of breath, this leads to a tenfold overdose (cf. section 3.4.2.2.).</u>	[not included]
61f./ 61	<u>These voices spoke of: Forced testimony under the threat of punishment; Compelled production of all documents to the prosecution; Refusal to provide documents for, or allow examination of documents by, the defence; Travel and currency prohibitions against the defence.</u>	[not included]
62	<u>Reference should be made at this point to a few detailed works on this problem.[185]</u>	[not included]
63	<u>Additionally, methanol-air mixtures are explosive. This renders attempts impossible to incinerate corpses with methanol.</u>	[not included]
63	<u>• According to professional air photo analyses, there were, at the time when the pictures were taken at the decisive locations, no large cremation ditches, no fuel stockpile, no development of smoke or flame.[54,72] Accordingly, the scenario of destruction is probably false in this regard.</u>	<u>• In chapter 1.3.3. (p. 31), reference was made to the analysis of a US air photo, according to which there were, at the time when the pictures were taken (summer 1944) and at the decisive locations, no houses, no barracks, no cremation ditches or similar things.</u>
66	[207]	[text of endnote 207 inside the brackets]
67-70/ 67-69	<p><u>3.4.2.2. POISONING OR SUFFOCATION?</u></p> <p>To this, the concentration reduction due to the respiration of the victims has to be added. Per capita, this is the higher, the higher the applied concentration is. The reason for this is that although the victims</p> <p style="text-align: center;">{68}</p> <p>incorporates lethal amounts of hydrogen cyanide in short periods of time in case of high concentrations, their organism reacts delayed. During this delay, the victim incorporates more overdoses of hydrogen cyanide.</p> <p><u>Graph 17: Schematic representation of the breathing volume behavior relative to time in case of suffocation/poisoning.</u></p> <p>Graph 17 shows the behavior of the breathing volume per minute of persons dying of suffocation or poisoning (biochemical suffocations). Respiratory arrest occurs at the end of this period of time (at 5). Death occurs only several minutes after respiratory arrest. If one assumes a time period of 5 minutes until respiratory arrest, the assumed breathing volume during each single minute is: 1.: 20 l; 2.: 30 l; 3.: 50 l; 4.: 80 l; 5.: 30 l (cf. for this [214]). In total, this yields a breathing volume of ca. 210 l. Furthermore, we assume that the function is independent from the length of time until respiratory arrest. This means that the double amount of air is inhaled if the time period would be doubled.</p> <p>Regarding morgue I ('gas chamber') of crematorium II, we have the following data: Volume: 500 m³; Volume of 1000 persons: ca. 80 m³; resulting free air volume: ca. 420 m³. First, the oxygen content in the room may be studied. In table 7, the total inhaled volume of 1000 victims is given in m³ and multiples of the free air volume as a function of time. The average oxygen content is reduced by 20-30% per inhalation. This results in the remaining oxygen content in the chamber as given in the last column. Oxygen contents below 6% are lethal[208]. So, even without adding any toxic</p>	<p>To this, the concentration reduction due to the respiration of the victims has to be added. Per capita, this is the higher, the higher the applied concentration is. The reason for this is that although the victims incorporates lethal amounts of hydrogen cyanide in short periods of time in case of high concentrations, their organism reacts delayed. During this delay, the victim incorporates more overdoses of hydrogen cyanide. In case of a high concentration applied (>1 vol.%), each person could incorporate not more than 1g HCN. At a hydrogen cyanide concentration of ca. 1 vol.% (12g per m³), this would correspond to 80 liters or 40 to 80 average breaths, hence an execution time of a few minutes (see experiences of F. Leuchter[150], p. 57). However, if death occurs only slowly due a low applied concentration, the victim would inhale much less</p> <p style="text-align: center;">{68}</p> <p>hydrogen cyanide, and the delayed reaction leads to the fact that the organism receives only small overdoses. In case of high final concentrations during a hypothetical execution of ca. 1.000 people, in accordance to the witness statements, a maximum of 1 kg hydrogen cyanide would be incorporated by the victims per gassing, which is ca. 5% of the applied amount (20 kg).</p> <p>One has to reckon with high adsorption rates of hydrogen cyanide especially at the cool and wet walls of the cellars of crematorium II and III, in contrary to Weller's hypothesis, according to which this is not supposed to happen[7]. According to his opinion, the little amounts of hydrogen cyanide applied were supposedly inhaled entirely. This does not only contradict the witness accounts of the quick gas chamber death[203] which required large amounts of hydrogen cyanide, but also all logic, since hydrogen cyanide would certainly have been quite unimpressed by possible orders of the SS to react only with the respiration organs of the victims. Even in case of low application amounts, one has to expect a quite intensive reaction of hydrogen cyanide with the masonry close to the source. Thus, one can safely dismiss Weller's hypothesis.</p>

gas, we have to reckon with the victims being suffocated to death in an airtight chamber already after some 45-60 minutes.

If one increases the number of locked-up persons, this process is accelerated accordingly. However, if there were Zyklon B holes in the morgues I of crematorium II and III during the wartime, contrary to the results achieved before, these rooms could not be sealed off in an air tight manner. Also, small amounts of air would have seeped into the interior through the ventilation shafts.

Table 7: Reduction of O₂ content in air-tight morgue I as a function of time.

<u>Time until respiratory arrest [min]</u>	<u>Inhaled volume of 1000 victims [m³]</u>	<u>in free volume of the room</u>	<u>Reduction of O₂ content (30% per Inhalation)</u>	<u>Reduction of O₂ content (20% per inhalation)</u>
<u>5</u>	<u>210</u>	<u>0,5</u>	<u>17,9</u>	<u>18,9</u>
<u>10</u>	<u>420</u>	<u>1</u>	<u>15</u>	<u>16,8</u>
<u>20</u>	<u>840</u>	<u>2</u>	<u>10,5</u>	<u>13,4</u>
<u>30</u>	<u>1260</u>	<u>3</u>	<u>7,4</u>	<u>10,8</u>
<u>45</u>	<u>1890</u>	<u>4,5</u>	<u>4,2 (lethal)</u>	<u>7,8</u>
<u>60</u>	<u>2520</u>	<u>6</u>	<u>-</u>	<u>5,5 (lethal)</u>
<u>120</u>	<u>5040</u>	<u>12</u>	<u>-</u>	<u>-</u>

Due to the extremely high capability of the lungs to absorb HCN, the human lunge acts like a perfect filter which absorbs all hydrogen cyanide out of the air. Taking the experiences of F. Leuchter ([151], p. 57) as a base, death occurs after 4-10 minutes at the earliest in case of an application of ca. 4 g HCN per m³. In assuming a total inhaled volume of ca. 210 l, this corresponds to an incorporated amount of HCN of ca. 800 mg, which is a tenfold overdose of the lethal dose (80 mg/person). In the following, it is assumed that an execution lasting several hours, no overdoses of HCN are incorporated. Using these benchmark figures, a relation between incorporated overdose and execution time results as shown in Graph 18.

{69}

Graph 18: Incorporated amount of HCN as function of time until respiratory arrest in overdoses of lethal dose (ca. 80 mg).

The HCN content in the air of a room decreases similarly by breathing as by ventilation (exponential behavior, cf. Table 9, section 3.4.2.4.). If the victims have inhaled the entire room volume once, the HCN content will be reduced to ca. 37% of the initial value. As a function of time passed until respiratory arrest occurs, Table 8 shows, how much HCN was incorporated by the victims in total (column 3), which portion of the total content of HCN in the air this is (column 4), how much HCN had been released in total (column 5), and how much Zyklon B at a carrier temperature of 20°C had to have been applied to release that much HCN as is required in this period of time (cf. Graph 13). The last column shows the ration of the inhaled amount of HCN and the applied amount. In so doing, it was assumed that the HCN concentration was available to every victim right from

Compared to delousing chambers, one can expect an accelerated distribution of hydrogen cyanide close to the source during hypothetical executions in a room filled with humans, due to breathing, moving and body heat. On the other hand, the distribution of the gas can be delayed due to the enormous filling of the room.

Extreme absorption effects of hydrogen cyanide on the wet walls and wet skin and by inhalation of those close to the source must be expected, leading to initially delayed distribution of hydrogen cyanide. Even under ideal conditions, which cannot be realized, i.e., with an immediate release of excessive concentrations, it must be expected that all victims would not be dead before 10 to 15 minutes (see experiences of F.A. Leuchter with executions, section 3.1., p. 57). Assuming these unrealistic circumstances, those standing far away from the sources would not have incorporated lethal amount prior to 15 minutes.

With a sufficiently high hydrogen cyanide amount (more than 0.5 vol.% of average end concentration or 6 g per m³), a successful killing in the medium sized, heated alleged 'gas chambers' of crematorium IV and V, where the Zyklon B was allegedly poured on the floor between the victims, seems possible within 30 to 45 min. [...]

the start. In reality, the applied amount of hydrogen cyanide had to be a bit higher than assumed here (Delay effects due to release and distribution of hydrogen cyanide).

Table 8: Amount of hydrogen cyanide as a function of execution time
(lethal dose = 80 mg/person = 80 g/1000 persons)

Time until respiratory arrest [min]	Over-dose	Inhaled amount of HCN [g]	Portion of released HCN [%]	released amount from carrier [g]	Applied Zyklon B (20°C) [g]	HCN _{inh} / HCN _{app} [%]
5	10	800	40	2030	28600	3
10	6	480	63	760	5000	10
20	4	320	86	370	1230	26
30	3	240	95	252	625	38
45	2	160	99	161	320	50
60	1,5	120	100	120	20	60
120	1	80	100	80	100	80

According to testimonies, the execution times until all victims were dead were less than 10 minutes[205]. When considering the delays caused by the release of the gas and its distribution, as well as the fact that death occurs only several minutes after respiratory arrest, the first two lines of Table 9 corresponding to execution times of ca. 10 and 15 minutes, respectively, are at the upper limit of witness accounts. This means that an execution within a few moments or minutes would have required enormous amounts of Zyklon B. Such witness accounts are therefore unrealistic. Furthermore, it must be assumed that, with the execution times attested to, only a fraction of the applied (<10%) and at the execution time released amount of hydrogen cyanide (<60%) actually could have been incorporated by the victims. The rest was available to react with, i.e., the wall. Therefore, one has to reckon with high adsorption rates of hydrogen cyanide especially at the cool and wet walls of the cellars of crematorium II and III, in contrary to Weller's hypothesis, according to which this is not supposed to happen[14]. According to his opinion, the little amounts of hydrogen cyanide applied were supposedly inhaled entirely. This contradicts the witness accounts of the quick gas chamber death which required large amounts of hydrogen cyanide. Finally, the application of small amounts of hydrogen cyanide would have been senseless, if the facilities were indeed air-tight, which would have been imperative for their use as a mass gas chamber. This is, because the victims would have died in a similar period of time due to lack of oxygen (cf. Table 7).

{70}

3.4.2.3. THE POSSIBLE SCENARIOS

First, we have to postulate against all realities that all 'gas chambers' had Zyklon B introduction holes. Although other ways to introduce Zyklon B into the crematoria I to III are technically imaginable, this would be a pure post-war invention, since all witnesses talk about holes in the roof. Even under ideal conditions, which cannot be realized, i.e.,

	with an immediate release of excessive concentrations, it must be expected that <i>all</i> victims would not be dead before 10 to 15 minutes (see experiences of F.A. Leuchter with executions, section 3.1., p. 57, as well as Table 8). With a hydrogen cyanide amount as used during delousings (ca. 1 vol.% of average end concentration or 12 g per m ³), which is released and distributed slowly, and in combination with the developing lack of oxygen, a successful killing in the medium sized, heated alleged 'gas chambers' of crematorium IV and V, where the Zyklon B was allegedly poured on the floor between the victims, seems possible within 20 to 30 min. [...]	
74/73	The toxic gas could not, therefore, have been introduced into the alleged 'gas chambers' in the manner described by the eyewitnesses.	The toxic gas could not, therefore, have been introduced into the alleged 'gas chambers'.
75/74	The eyewitnesses to the alleged incineration of the bodies, finally, are full of absolute fantasies: incinerations in deep ditches, incineration with liquid fuels, entirely without, or with ridiculously little fuel, the destruction of corpses with explosives, the collection of human fat. These have nothing to do with technically possible reality, and are largely refuted by the Allied air photo evidence (no huge ditches, no smoke, no fire, no fuel storage areas).	[not included]
77/76	Killing all the victims in a few (<5) minutes would be impossible even when using of very large quantities of Zyklon B (much more than 10 g per m ³).	Killing all the victims in 2 to 15 minutes would be impossible even when using of very large quantities of Zyklon B (much more than 10 g per m ³).
95	If the mass gassing had occurred under the reported conditions (rapid death), then large quantities of Zyklon B would have to have been used, leading, in a short period of time, to hydrogen cyanide concentrations comparable to those used in the fumigation of personal effects (c _k likewise the same). At the same time, the respiration of the victims at the reported rapidity of execution could drop to a maximum of 50% (Section 3.4.2.2., p. 67, c _k (Fumigation) approximately 1/2c _k (delousing)). [...]5,000 to 50,000[...]3.6 seconds[...]	If the mass gassing had occurred under the reported conditions, then, as discussed before, Zyklon B amounts comparable to those used for delousing procedures would have been used (c _k likewise the same). [...]10,000 to 100,000[...]1.8 seconds
103	[...] to form cyanide compounds in the walls. [not included] A nearly complete intake [...]	[...] to form cyanide compounds in the walls. In fact, Weller's theses is supported more by wishful thinking than by chemo-physical laws. A nearly complete intake [...]
104	One thing that is noteworthy here is how flexible people can be in argumentation, according to the situation. It was previously pointed out that the existence of cyanide compounds in the Iron Blue colored walls of a room in the former concentration camp Majdanek was given as proof of gassing of humans, ⁵⁴ yet now we are to believe that this missing evidence in Auschwitz is no proof that there were not killing gas chambers there. Following the new logic of Wellers, the cyanide compounds in Majdanek must not be due to gassing of humans, but to gassing for delousing, making the reports of gassing at Majdanek doubtful.	[not included]
109	⊗ Mr. J.C. Ball for his broader investigations of the allied air photos of Auschwitz; [...] ⊗ the Polish Historical Society for their productive critique regarding the hydrogen cyanide incorporation by the victims;	[not included]
109	⊗ the historians Dr. R. Zitelmann, Prof. Dr. W.G. Haverbeck, Prof. Dr. H. Diwald and Prof. Dr. E. Schlee	⊗ the historians Dr. R. Zitelmann, Prof. Dr. E. Nolte, Prof. Dr. W.G. Haverbeck, Prof. Dr. H. Diwald and

	for their encouraging words;	Prof. Dr. E. Schlee for their encouraging words;
<p>Translator's Affidavit:</p> <p>I CERTIFY THAT I POSSESS EXPERT COMPREHENSION OF BOTH THE ENGLISH AND GERMAN LANGUAGES AND THAT THE TRANSLATIONS CONTAINED HEREIN ARE TRUE AND ACCURATE RENDITIONS OF THE ORIGINAL GERMAN DOCUMENTS:</p> <p>.....</p> <p>J. M. Damon, MA, Germanist, University of Texas at Austin 1600 Northwood Road, Austin, TX 78703, 27 Nov. 2000, jdamon@austintx.net, (512) 472-3959</p>		

I declare under penalty of perjury under the laws of the State of Alabama that the forgoing is true and correct.
Executed this ____ day of _____ 2001 in Toney, Alabama 35773

Germar Scheerer