
KEYWORDS: Holocaust, due process, law, international law, Nuremberg Trials, World War II
DOI: [https://doi.org/10.4079/2578-9201.4\(2021\).02](https://doi.org/10.4079/2578-9201.4(2021).02)

Victory for Justice or Victor's Justice? Due Process and the Legacy of the Nuremberg Trials

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ABSTRACT

The Nuremberg Trials are one of the most well-known legal exercises today. Taking place over the greater part of a year between 1945 and 1946, Allied forces conducted trials to bring various high-profile Nazi officials to justice. Ultimately, twelve Nazis were sentenced to death (in addition to another who was sentenced to death in absentia) and six more were given jail time. This research investigates whether criticisms of the Nuremberg Trials are legitimate, including if and how the Trials impacted the future of international law. Primary sources and first-hand accounts of the Trials will be key to my research as they will provide critical information as to how the Trials were conducted, the methods and reasoning behind these decisions, and the impact that they had on both the defendants and the larger body of international law itself. The results of the research suggest that, despite justifiable criticisms and cases of moderate to severe deviation from the norms, the Nuremberg Trials followed proper due process procedures, establishing a legal framework in which future international criminal cases could adhere. This is not to say that critiques of the Trials are not legitimate; however, the research and synthesis of primary sources, as well as legal scholarship devoted to the topic of analyzing the Nuremberg Trials, suggest that the Trials abided by strict norms and influenced how other courts operated, given the insurmountable task of holding those who committed crimes against humanity accountable.

GENESIS OF INTERNATIONAL LAW AND LITERATURE REVIEW

The judges, prosecutors, defense, and governments of Allied nations were given the task of exercising justice on those who had committed the crimes of the Holocaust. There should be no questioning that the Nuremberg Trials were perhaps the most ambitious legal experiment in modern history. In addition to the trial itself, these individuals had to craft a legitimate legal framework and body to oversee and enforce codified international law for future decades, all while respecting established legal norms. Regardless of this monumental task, the Nuremberg Trials were an exercise in international law that adhered to due process norms; through such actions, it forged a path for future international legal proceedings, despite being an exercise of victor's justice — the tribunal conducted by victors over the vanquished.

Before the International Military Tribunal (IMT), individual countries attempted to hold their own citizens accountable for what the countries deemed crimes against humanity and war crimes. Conferences in 1899 and 1907, for example, were critical in shaping the standard of warfare for the early twentieth century. Before these conferences, individual nations were given the mandate to try their

accused nationals. There were few internationally codified laws that dictated the practice of warfare before the IMT. When countries had the opportunity to prosecute their nationals for war crimes, the trials were "inadequate," according to Meron, a legal scholar and former president of the Appeals Chamber for the UN International Criminal Tribunal for the former Yugoslavia (2006). Meron also stated that "justice was not done, and the opportunity was missed to promote compliance with the law by more transparent and more widespread punishment of war crimes" (p. 558). The inability for nations to convict their own nationals of war crimes made the creation of an international war crimes court even more important, as it emphasized the necessity of an independent body capable of holding criminals accountable for violent acts.

As a result of this need, the IMT was formed, holding trials for accused war criminals in Japan after World War II while conducting the Nuremberg Trials from November 1945 to October 1946. One of the most well-known criminal trials in modern history, 24 of the highest war criminals in the Nazi organization were prosecuted. The legacy of the Trials still depends on how legitimate current legal scholarship regards its exercise of justice. The concept of due process, therefore, is a necessary component of the Trials to cover when discussing

their legitimacy, as no criminal tribunal can be considered legitimate when due process is suspended or violated. I argue that despite the Trials being inherently an exercise in victor's justice, due process was still closely adhered to, making the trials legitimate and providing an enduring legacy for future international law. I will investigate specific criticisms and arguments that claim due process was suspended throughout the Trials, as well as provide evidence to show that the legacy of the Nuremberg Trials should rely on its loyalty to due process. One major problem with the international legal framework before Nuremberg was that there was essentially no mechanism to enforce the rulings of the law. International treaties of the early twentieth century "made no allowance for the imposition of individual criminal responsibility upon persons responsible for violations of either its provisions or those of its annexed regulations" (Meron, 2006, p. 554). Essentially, even if individuals were on trial for their involvement in war crimes, they could not be held personally responsible, and it was often the state that dealt with any repercussions stemming from breaches of international law. More often than not, these repercussions manifested themselves in financial compensation by the state. International tribunals before the Nuremberg Trials were fundamentally unable to punish individuals, such as state leaders, warlords, or soldiers, for their participation in war crimes. The Nuremberg Trials represented a change in that practice, where specific people, mainly leaders in the Nazi bureaucracy, were charged as individuals and given individual sentences.

Due to the fundamental change the Trial brought to the practice of international law, there has been considerable legal and political scholarship assessing its components. The Nuremberg Trials are unique to other major events in legal history for contemporary researchers in that a few key players in the trials, such as judges, prosecutors, and reporters, wrote extensively about their experiences, even into the twenty-first century. Meron's 2006 article in the *American Journal of International Law*, "Reflections on the Prosecution of War Crimes by International Tribunals," creates a narrative of the birth and rapid growth of the framework surrounding international law, from an almost non-existent legal practice to the booming global institution it is today. Such information thus provides a timeline of critical events leading up to and resulting in major international legal institutions, including the Nuremberg Trials and UN International Criminal Tribunals.

Ferencz's "Nurnberg Trial Procedure and the Rights of the Accused" (1948) delves deeply into those due process norms and guidelines that drove the Trials; his first hand experiences as both a US soldier who oversaw the liberation of concentration camps and a prosecutor in the Trials makes his related scholarship some of the most well-regarded texts for researchers in this arena. This piece in particular provides defense of the processes of the

Nuremberg Trials that have come under tight scrutiny in subsequent years. As will be discussed, criticism of some judicial practices and lapses in the enforcement of due process are equally prevalent, and Ferencz's accounts of the reasoning behind these processes are mainstays in scholarship surrounding international law, particularly in these trials. Of course, Ferencz's experiences as an Allied prosecutor for the Trials must be taken into account when considering his possible bias, though this piece does not include sources for where due process could be abused.

Conversely, Wyzanski (1946) was one of the most outspoken critics of some of the practices of the Trials and his work is often cited when outlining how the standards of the Trials deviated from other accepted legal codes, especially in the United States. Wyzanski's argument that there was no true neutral judge to preside over the trials is one of the leading components of the "trial by victors" argument. Wyzanski warns that the judges may have been influenced by sheer outrage and desire for revenge against the defendants, which would set an incredibly dangerous precedent for future war crime trials. The question in response to Wyzanski's justifiable criticisms therefore is whether it would be possible to find any judge who is not influenced by the horrors of the Holocaust. Turkheimer's *Reflections on Nuremberg* (2017) is one of the most modern utilized sources for the topic, discussing the reaction of the legal community, past and present, in response to the Nuremberg Trials. By outlining the cases and convictions, or lack thereof, for several prominent Nazis, as well as investigating the reaction at home to the Nuremberg prosecutors, Turkheimer links together various criticisms and plaudits of the Trials into one narrative.

JUSTICE BY THE VICTORS

The winning nations of World War II were given the mandate to hand down sentences to those who lost through the International Military Tribunal. Therefore, by definition, the Nuremberg Trials were an exercise in victor's justice, since "one of the principal criticisms of the Nuremberg and Tokyo Tribunals was, and is, that they were victors' courts trying the vanquished" (Meron, 2006, p. 569). Such a claim is substantiated by the profiles of the jury of judges, as "each of the major Allies had appointed one judge and an alternate to the International Military Tribunal" (Beltzer, 1996, p. 896).

Throughout the trials, and into the present, there remains considerable legal criticism of the jury of judges. United States District Court Judge Wyzanski argues that Count 2 of the Nuremberg Trials "is tried not before a dispassionate neutral bench, but before the very persons alleged to be victims. There is not even one neutral sitting beside them" (*The Atlantic*). Wyzanski argued that the nature of Count 2, "crimes against peace," being political made it impossible for the jury of judges from countries

impacted by political crimes to be impartial. Because the judges represented the nations made victims by these crimes, arguments that they were inherently biased became increasingly prevalent, with some criticism claiming that judges could not separate their rulings from personal beliefs that stemmed from their nation's victimhood (McKeown, 2013).

The question then becomes why the framers of the Nuremberg Trials decided to proceed with a jury of judges instead of a jury of peers, as in American criminal courts. In the case of World War II, and particularly the Holocaust, there "left no real neutrals whose interests were completely unaffected" (Ferencz, 1948, p. 145). This logic made it clear that a trial by one's peers would be inherently biased, as there would be no possible way to select a group of people who were both informed about the horrors of the Holocaust while still legally and morally neutral. Ferencz disputes the belief that judges are inherently biased as well, and claims that the transparency of the trials and the high amount of legal criticism available in Western democracies, especially in the United States, made a jury of judges more neutral and therefore more suitable to decide the cases, as opposed to a jury of peers. A neutral jury of judges then seemed more suited to follow due process norms than biased ones, establishing that the neutrality of the judges at Nuremberg was important in arguing due process was carried out throughout the tribunal.

Scholars argue that the fact that the trial was carried out by the victors required close criticism but was not immediately disqualifying. Ferencz (1948) defended the premise of the Trials by arguing that "the fact that members of a defeated nation are tried in tribunals of the victor creates the need for closest scrutiny of proceedings but does not necessarily or by itself render the conduct of the trials corrupt" (p. 144). A trial by victors was neither unique nor unheard of by the time World War II ended and had been practiced after previous wars, including by the US after the Revolutionary War, when George Washington tried Major Andre as a British spy. Ferencz alludes to Andre's specific case – a British spy who was taken into custody and executed by the Continental Army for assisting Benedict Arnold during the Revolutionary War – as a way to illustrate the historical frequency of courts of victors (or in this case, the more powerful) exercising justice on those they ruled to have committed crimes. The fact that there are historical cases of this type of justice is critical in refuting criticism or dismissals of the Nuremberg Trials, simply on the grounds of victor's justice alone.

The concept of a trial of victors was justified by many legal scholars when comparing it to modern criminal cases. To those who scrutinized the proceedings as being

the winners of the war deciding on the fate of the losers, Ferencz (1948) tells them to examine the structure of our society today, saying "the individual offenders placed on trial are no more 'vanquished' than an ordinary criminal apprehended by police representing law-abiding society" (p. 145). They utilize this analogy to show that it would have been impossible for the Nuremberg Trials to be anything but a trial by victors, and that there is no contemporary criminal justice system that would be able to function if it were not implementing victor's justice. Therefore, it can be concluded that a trial by the victors on the vanquished does not inherently result in breaches of due process, and the Trials can hold a legacy as legitimate legal exercises in spite of being carried out by the victors of World War II.

THE LEGAL STRUCTURE THAT GOVERNED THE NUREMBERG TRIALS

A major challenge for the litigants at the International Military Tribunal was that there was only a rudimentary framework upon which to base their research and subsequent litigation. The IMT relied mainly on the London Charter, which within it included the Constitution of the IMT¹, to drive their legal proceedings. In order to allow for a more streamlined prosecution process and minimize the debate over semantics, the Constitution of the IMT outlined the three types of crime, all of which the IMT had jurisdiction over, with each crime having its own separate prosecution.

The first crimes under the IMT's jurisdiction were "crimes against peace", which the Constitution described as "planning, preparation, initiation or waging of a war of aggression, or a war in violation of international treaties, agreements or assurances, or participation in a common plan or conspiracy for the accomplishment of any of the foregoing." Essentially, crimes against peace were the planning or intention to act on crimes against humanity or war crimes. War crimes were described as "violations of the laws or customs of war" which included "murder, ill-treatment or deportation to slave labor or for any other purpose of civilian population of or in occupied territory, murder or ill-treatment of prisoners of war or persons on the seas, killing of hostages, plunder of public or private property, wanton destruction of cities, towns or villages, or devastation not justified by military necessity" (Constitution of the IMT, 1945).

It was important for the Constitution to be as specific as possible when listing war crimes as opposed to crimes against humanity, as war crimes were classified as being carried out with the victims mainly being rival or opposing combatants, while crimes against humanity were described as being conducted against civilians. Additionally, crimes against humanity were specifically drawn out by the Constitution and included "murder,

¹ The Constitution of the IMT was the product of an agreement between the United States, France, the United Kingdom, and the USSR. It codified various human rights laws and also dictated the judicial proceedings of the Nuremberg Trials.

extermination, enslavement, deportation, and other inhumane acts committed against any civilian population, before or during the war; or persecutions on political, racial or religious grounds” (Constitution of the IMT, 1945).

The Constitution gave the prosecution powerful legal tools, including supranational superiority. An important addendum in the description of crimes against humanity was that all actions “in execution of or in connection with any crime within the jurisdiction of the Tribunal, whether or not in violation of the domestic law of the country where perpetrated” were considered crimes against humanity (Constitution of the IMT, 1945). The prosecution at the IMT, therefore, could essentially override domestic governments and laws that protected war criminals, which led to many criminals in post-World War I trials escaping punishment. This gave the IMT sovereignty over domestic laws, a groundbreaking feature in international law that was later copied by other international legal bodies.

One issue that the framers of the Constitution and the prosecution faced regarded the international law principle *nullum crimen sine lege*, which states that someone cannot be tried for a crime that has not been codified as such before they committed said act. Many of the Nazis’ crimes that an international commission claimed were in violation of the “laws of humanity” could not be brought to the IMT, because the “laws of humanity” were not codified as a legally binding structure beforehand². The Constitution of the IMT represents the impact the *nullum crimen sine lege* principle had on the codification of international law as it made the framers create both a specific and widespread legal body that could be used in the future to enforce violations of international law.

The question then became who could be charged with various crimes. Solely trying the heads of the Nazi organization or the commanders of the camps risked creating a suspension of justice, with too many participants in the crimes going free. This is because there were many people who were responsible for the carrying out of the Holocaust, from the Nazi leaders to the prison guards. In order to ensure that the tribunals could exercise justice on the greatest number of perpetrators possible, The Constitution specifically laid out the people who could be tried with these crimes as the “leaders, organizers, instigators and accomplices participating in the formulation or execution of a common plan or conspiracy to commit any of the foregoing crimes are responsible for all acts performed by any persons in execution of such plan” (Constitution of the IMT, 1945). This represented a radical departure from criminal tribunals of the post-World War I era, where most nations, rather than individuals, were made to face punishment.

EVIDENCE

The Nuremberg Trials had an overwhelming amount of evidence against the defense. The Nazis were meticulous record keepers, and many of these records were not destroyed when the Allies liberated concentration camps in 1944 and 1945. Additionally, such records existed all over the Nazi empire, providing the prosecution a multitude of documents and primary sources connecting specific people to certain crimes. The question was no longer about whether the Nazis were guilty of committing these crimes, but instead on whether these crimes were in violation of international statute and if there was enough evidence to justify sentences. Oftentimes, there were pieces of evidence that so clearly incriminated one person to the specific crimes or the Holocaust as a whole that there was no need for any other evidence or deliberation, such as this memorandum tying Nazi leader Herman Goring to the carrying out of the Holocaust:

As to crimes against humanity (Count Four) the evidence there was explosive: Göring had, in a written memorandum, to the head of the Main Security Office of the Reich on July 31, 1941—at about the time when virtually all of European Jewry was under the control of Germany and its allies—telling him he was responsible for and to obtain the cooperation of other government agencies in putting into effect the Final Solution to the Jewish Question. This document placed Göring at the heart of the Holocaust, a part of count four, and it was hardly necessary to show more (Tuerkheimer 28).



Men sift through documents procured by Allies from the Nazis to use as evidence at the Nuremberg Trials, courtesy of USHMM Photo Archives (Credit of Charles Alexander)

Meron (2006) cites the failure of the Nazis to destroy

² Meron also points out that many crimes committed by the Nazis could not be prosecuted because the Allies had committed the exact same acts throughout the war.

Holocaust documentation before the end of the war as a major turning point for the prosecution, saying “because the German bureaucracy did not destroy its official documents before the Allied victory, its extensive archives provided a ‘treasure trove’ of evidence for the prosecution” (p. 560). As entire bookshelves of primary sources and documents from the Holocaust were uncovered and used as evidence to tie Nazis to the war crimes and crimes against humanity of the Holocaust, it is hard to describe just how much evidence there was for the prosecution. Illustration 1 shows aides sorting through documentation available to the prosecution throughout the trials, displaying how much the Allied prosecution had access to.

A major piece of evidence the prosecution introduced was a motion picture documenting the scenes that Allied forces encountered when they liberated various concentration camps. This piece of evidence was intended to “produce visual knowledge of atrocities that resisted summary in the words of eyewitness testimonials” (Douglas, 1995, p. 452). The idea was that this film could provide visuals for written and verbal evidence and push back on a defense claiming that this evidence was propaganda. However, the film, Douglas argues, presented a unique legal challenge for the Tribunal and their attempts to adhere to a standard of due process. Douglas claims that the film, instead of solidifying justification to convict the Nazis of crimes against humanity, tied the prosecution into a legal quagmire.

Introducing the film as evidence raised a great issue for the prosecution at Nuremberg. Many criminal trials before did not allow for photographic evidence to be introduced for various reasons, including being too “gruesome” or “redundant,” simply backing up testimonies from eyewitness accounts instead of introducing any new details to strengthen the case (Douglas, 1995, p. 467). The IMT was able to circumvent this issue by relaxing the rules that governed the introduction of evidence into the Nuremberg Trials. This bolstered the prosecution in allowing them to use photographic evidence to present “the most reliable and complete representations of unspeakable atrocities” (Douglas, 1995, p. 468).

There were several issues, however, that this type of film brought to the prosecution and the Trials as a whole. Douglas (1995) claims that it was not enough for the prosecution to simply present the film to the Court; instead, it had to “locate an adequate idiom of both representation and judgement” (p. 453), meaning that the prosecution had to be able to synthesize the film into their legal arguments against the Nazis. The prosecution’s film was indicative of a larger issue they faced: although it was well established that the Nazis wanted to wipe out the entirety of European Jewry, was that enough to convict the defendants and sentence them to a severe punishment? The prosecution knew they could not simply introduce pieces of evidence that

were morally objectionable, they had to be defined as specifically illegal under the London Charter or other governing international law structures. Douglas argues that in order to fully utilize the film as evidence of crimes against humanity by the Nazis, the prosecution actually misinterpreted some of the images shown to prove the Holocaust as an exercise of slaughtering and enslaving civilians and prisoners of war, instead of a genocide, in order to represent the political, rather than symbolic, motives behind the Holocaust. The example of the film showed how law and due process constrained the prosecution in their use of evidence, where documents and film that unquestionably showed crimes committed by the defense had to still be cautiously used to achieve legal goals.

EXERCISE OF DUE PROCESS

Despite the overwhelming amount of evidence, not all defendants were convicted of crimes, largely because of the IMT’s due process standards. Due process may not have been a principal concern of the Allied prosecutors and judges convening the trial, as “the London Charter was short on due process protections” (Meron, 2006, p. 569). However, there ended up being quite the due process framework being instituted at IMT, which consisted of “a rigorous Anglo-American burden on the prosecution” (Meron, 2006, p. 569). McKeown argues that “rules adopted were an amalgamation of Anglo-American and continental European systems, though they were predominantly based on the American model,” a necessary compromise that “protected the defendants’ rights under both” (McKeown, 2013, p. 6).

The fundamentals of due process were observed during the Nuremberg Trials, with due process rights, such as public trial and counsel, being available to the defendants. Counsel for defendants is a critical component of due process, as “the presence of counsel is a means of reducing power imbalances between defendants and the state, and of securing the right to equal justice” (McKeown, 2013, p. 7). Not only was counsel present for the defendants throughout the tribunals they were also treated well by the Allies, signaling their intention for the trials to be fair. Ferencz (1948) wrote that defense lawyers, who were selected by the defendants themselves and were often actually Nazi lawyers on trial themselves, were treated better than Allied soldiers were, saying:

By command of the Military authorities all defense lawyers are given the largest German ration allowance, authorizing them 3900 calories daily which is more than the amount received by American soldiers and almost three times the amount available to the average German. In addition, each one is gratuitously issued a very highly-prized carton of American cigarettes per week, which is a privilege afforded no employees of

Military Government (p. 147)

This was an important move by the part of the Allies in the sphere of public relations: in order for the trials to be seen as legitimate and fair and for justice to have been perceived as carried out, there would have had to be no defensive intimidation at all. Treating defense lawyers as such that the Nuremberg Trials were not a farce of a trial, but instead a true exercise of justice.

A major legal battleground in the debate over whether due process was achieved in the Nuremberg Trials stems from the *nullum crimen sine lege* philosophy, the same principle that those who formed the Constitution of the IMT faced. This philosophy, according to the Cornell Law School, “is the principle in criminal law and international criminal law that a person cannot or should not face criminal punishment except for an act that was criminalized by law before he/she performed the act.” Wyzanski argued in his 1946 piece for *The Atlantic* that this is one of the most fundamental principles of politics and law, and that “it rests on the political truth that if a law can be created after an offense, then power is to that extent absolute and arbitrary.” In other words, without this principle in place, it would be possible for anybody with political or legal power to prosecute their opponents with nonexistent or arbitrary laws established at will. Those who claim that there was a lack of due process throughout the Tribunals often associate violations of this principle as a major reason.

Meron claims that the *nullum crimen* philosophy was adhered to closely throughout the tribunals. Meron argues, “the Nuremberg Tribunals rooted the principle of legality not only in custom, but also in treaties and general principle,” asserting that arbitrary laws were not being made in order to ensure that Nazis were found guilty, but instead that there was a legitimate legal framework constructed (p. 576). Further, Tomuschat (2006) argues that “Nuremberg introduced no real innovation capable of being denounced as violating the proposition *nullum crimen sine lege*” in response to objections saying that the philosophy was ignored or suspended throughout the Trials. Tomuschat (2006) continues by saying that “it was easy to demonstrate that the punishable character of crimes against humanity was established in accordance with general principles of international law as set out in Article 38 of the Statute of the PCIJ.”³ By following

the principles of international law set out by the PCIJ, Nuremberg cannot be accused of violating *nullum crimen sine lege*, as its processes and rulings adhered closely to previously established legal clauses.

Legal scholars to this day, however, point out various violations of common due process rights that did occur throughout the trials. Meron points to the behavior of the judges as possible breaches of fair trial standards. Meron (2006) identifies some examples of where the behavior of the judges may be fairly subject to criticism: “three of them arrived after the trials started. All absented themselves from proceedings for greater or lesser periods. Some of the death penalties were decided on a 6-5 basis” (p. 570).⁴ The lack of unanimity in some of the Nuremberg convictions remains a topic of major controversy in the legal community and similar practices are under considerable review.⁵

One such case of a suspension of due process can be seen in the conviction and execution of Julius Streicher, the publisher of notorious anti-Semitic publication *Der Sturmer* and close associate of Adolf Hitler. The strategy of the prosecution in this particular case was that they “argued that without the willingness of the German population to go along, the Holocaust could not have happened” (Turkheimer, 2017, p. 31). The prosecution claimed that Streicher’s comics and writings ensured that the population would be complicit in the Holocaust. Streicher’s conviction on charges of crimes against humanity remains controversial amongst legal scholars and “there was a general consensus among the attendees at the conference that Streicher probably should not have been convicted: all he did was write and virtually all his writings antedated the Holocaust” (p. 31). However, this logic is refuted because it was the anti-Semitism from the writings of Streicher and similar high-profile authors that fueled Nazi Germany and allowed for the Holocaust to happen.⁶

There will remain considerable debate over the legacies of the Nuremberg Trials. The fact that the Trials were inherently a practice of victor’s justice does not make them automatically illegitimate or unable to exercise due process. In fact, it can be concluded that the Trials were able to successfully exercise due process despite being conducted by victors on the vanquished. Although individual cases can be isolated as examples when the Trials failed to adhere to due process clauses, it

³ The PCIJ being the Permanent Court of International Justice, which was published in December 1920.

⁴ One judge in particular, Major General Nikitchenko of the USSR, is documented of being biased in his role. “Nikitchenko revealed his belief that the purpose of the trial was to determine the appropriate punishment to be given to the Nazi defendants, whose guilt had already been determined,” McKeown writes in their piece on the procedure of the Nuremberg Trials (18).

⁵ The US Supreme Court is in the midst of hearing arguments for a case trying to reverse convictions of criminals who were found guilty by split juries.

⁶ Had Streicher been tried in the United States, Turkheimer writes, “he probably would have had a valid First Amendment defense” (32). Of course, this is a view that inherently privileges American jurisprudence.

is clear that the Tribunal set out to follow necessary due process and was generally successful, as seen through the Constitution of the IMT as well as treatment of defense attorneys, adherence to the nullum crimen sine lege principle, and the institution of systems that protected the rights of the defendants.

The Nuremberg Trials was a major step in the field of criminal law, and when they ended, a new system of international law was born. The young art is still being shaped by important scholars and lawyers who study the structure and proceedings of the Nuremberg Trials closely, but there would be no body of international law to even work with if the Nuremberg trials had not occurred. The legal experiment of the Nuremberg Trials influenced the modern science of international law and the endeavors of the prosecution, defense, and jury of judges made it possible to hold the perpetrators and accomplices of unthinkable acts accountable for their crimes.



Cover page of an edition of *Der Stürmer*, an anti-Semitic publication by Julius Streicher. Courtesy of USHMM Photo Archives (Credit: Virginius Dabney)

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