

INTERROGATORIES

UNITED STATES

^{v.}
INOUE, Sadae, et al

24 March 1949.

The following interrogatories are requested to be propounded to the Chief of the First Demobilization Bureau, Japanese Government, in Tokyo, a witness for the defense in the above entitled case now pending and to be tried before the Military Commission convened by authority of the Commander Naval Forces, Marianas (by precept dated 19 January 1949 as modified), are agreed upon by both parties in advance of the assembling of the Military Commission and subject to exceptions when read in court, in accordance with the authority of paragraph 6 of said precept, and the authority contained therein and the rules of evidence promulgated by the Supreme Commander for the Allied Powers, SCAP ltr AG 000.5 (5 Dec 1945) LS Subject "Regulations Governing the Trials of Accused War Criminals," especially Section 5 d (1) (c) thereof, which authorizes the use in evidence of affidavits, depositions or other signed statements.

These interrogatories are respectfully forwarded to the Supreme Commander for the Allied Powers, Legal Section, Tokyo with the request that some suitable officer may be assigned to take, or cause to be taken, the deposition of the said witness thereon:

First Interrogatory: State your name and present position.

Second Interrogatory: Are you or any other person in the employment of the First Demobilization Bureau, of which bureau you are the director, qualified to submit an explanation of the Japanese Army Regulations and Customs, particularly as regards Kempetai and the chain of command and command relationship between Kempetai and regular army troops?

Third Interrogatory: If you are not qualified to do this, do you know who is so qualified? State his name, present work and the bases upon which you consider him best qualified to submit an explanation of the Japanese Army Regulations and Customs.

If you are not qualified to supply answers to any of the following interrogatories, submit an answer in the form of a sworn affidavit from person(s) so qualified, as prescribed in the third interrogatory.

Fourth Interrogatory: Were there Kempetai in the Japanese Army which were completely dissimilar in their organization and management? If so, state the differences in organization and management of each.

Fifth Interrogatory: State the designations of the Kempetai in the Palau, South Sea Islands, around September 1944, around the end of December 1944 and in the latter part of May 1945.

Sixth Interrogatory: In what category of Kempetai as set forth in the answer to the Fourth Interrogatory did the South Seas Kempetai fall around September 1944, the end of December 1944, and the last ten days of May 1945?

Seventh Interrogatory: State to what chain of command the South Seas Kempetai was subordinate around the end of September 1944, around December 1944, and in the last ten days of May 1945?

- Eighth Interrogatory:** Was there any command relationship between the Commanding General of the 14th Division and the Commanding Officer of the South Seas Kempetai around September 1944 and towards the end of December 1944?
- Ninth Interrogatory:** If there were any command relationship during the periods mentioned in the preceding interrogatory, state the bases for your assertion.
- Tenth Interrogatory:** State what relationship existed between the Minister for Greater East Asia, the Governor of the South Sea Government Office, and the District Attorney of the South Sea Government Office in regard to the execution of duties of the Commanding Officer of the South Seas Kempetai around September of 1944 and the end of December 1944.
- Eleventh Interrogatory:** Do the Army Regulations specifically define the duties and responsibilities of Chief of Staff to a Commanding General in time of war and under battle conditions? If so, what are the duties and responsibilities as set forth in Army Regulations.
- Twelfth Interrogatory:** Are there any valid Japanese Army customs which further limit or increase the duties and responsibilities of a Chief of Staff to a Commanding General of a Division in time of war and under battle conditions? If so, please set forth these customs.
- Thirteenth Interrogatory:** Do such customs fulfill all the principal conditions in order to constitute a valid custom according to Japanese law?

Dated at the Headquarters, Commander Naval Forces, Marianas, this twenty-fourth day of March, 1949.

Martin E. Carlson
MARTIN E. CARLSON,
Commander, U. S. Naval Reserve,
Defense Counsel.

Joseph A. Regan
JOSEPH A. REGAN,
Lieutenant Commander, U. S. Navy,
Judge Advocate.

Exhibit 11 (2)

Deposition

Yoshio Kozuki, the Director, Demobilization Bureau, Repatriation Relief Agency, Japanese Government, the witness above named, having been first duly sworn by me, Lieutenant (junior grade) Frederick F. Tremayne, United States Naval Reserve, the Commander Naval Forces Marianas Liaison Officer for War Crimes, Tokyo, Japan, doth depose and say for full answers to the foregoing interrogatories, as follows:

Exhibit 11(3)

0252

Affidavit

I hereby make an affidavit as follows after swearing as shown in a separate sheet to conform to the usage which is in vogue in our country.

Answer to the first interrogatory: Kosuki Yoshio, Director of Demobilization Bureau, Repatriation Relief Agency.

Answer to the second interrogatory: I am not conversant with the military police affairs, but there are former officers of the Demobilization Bureau, who can explain on the referred matters.

Answer to the third interrogatory: Murakami Masaichi, Commerce in occupation.
Murakami Masaichi is a former colonel and after graduation from the Army Staff College served in the Defense Section, Military Service Bureau, War Ministry in April 1945 and during this period he had some connection with military police affairs.

Answer to the fourth interrogatory: The answer to the fourth interrogatory and followings made with the affidavit of Murakami, Masaichi, are as annexed papers.

Exhibit 11(4)

0253

SWORN DEPOSITION

In accordance with my conscience I hereby swear to tell the truth, withholding nothing and adding nothing.

April 11, 1949

/s/ KOJUKI, Yoshio.
signed and sealed.

OATH

In accordance with my conscience I hereby swear to tell the truth withholding nothing and adding nothing.

April 13, 1949

/s/ MURAKAMI, Masaichi.
signed and sealed.

DEPOSITION

MURAKAMI, Masaichi Trader.

After taking the oath as on the annexed sheet, I depose as follows:

In answer to the
Fourth Interrogatory

The Japanese Kempei was divided into domestic and overseas Kempei (Manchuria, China and Southern areas etc.) There was considerable difference in the organization, structure and duties of these two types of Kempei.

The domestic Kempei was under the command of the Kempei Commandant and under the jurisdiction of the War Minister. The outline of their duty, authority and disposition was regulated by the Ordinance Governing Kempei (Imperial Ordinance). Their organization was determined by Military Ordinances and the operation of their authority was based on laws and Imperial Ordinances. Furthermore it was determined that they shall primarily assume charge of military police affairs and concurrently perform administrative and judicial police duties.

The overseas Kempeitai were units subordinate to the Commanding General of the Expeditionary Forces overseas. The overseas Kempei were mainly in charge of preservation of peace (i.e. security of military secrets in the field and areas of occupation, alertness for and prevention of propaganda and subversive activities, maintenance of peace and order, suppression of crime by hostile residents, etc.) and military police.

In regard to service regulations of the Kempei their execution was regulated by a military command order. Consequently, the details concerning the organization, duties, jurisdiction, chain of command and method of administration of the Kempei were left to the discretion of the commanders of the army units concerned.

The service of the overseas Kempei was mainly carried out on the basis of the Ordinance Governing Kempei in the Field, and of the paragraph on Kempei, Section 7, Part III of the Field Service Regulations. (Operational Handbook).

Answer to the
Fifth Interrogatory

The organization of the South Seas Kempetai was as follows: 1 Kempetai Headquarters and several Kempai Detachments. I believe that at the time of its inception, there were a headquarters and one detachment in the Palau Islands. I recall that there was no change in its organization from the time of its activation such as reinforcement of personnel which would have affected its organization. I do not think, therefore, that there were any great changes in the organization of the Kempetai in the Palau Area around September and December of 1944. As to strength and disposition of troops under the strength of a platoon, I do not know, as it is believed that changes were made locally and extemporaneously to suit the battle conditions.

In answer to the
Sixth Interrogatory

Around September and December 1944, the South Seas Kempetai had the characteristics of a domestic (Homeland) Kempetai. Even in this case, the War Minister had the power to authorize the highest ranking local commanding general to command the Kempai, (Article 3 of Ordinance Governing Kempai) and it was probably so authorized. However, there are no records available of such authorization.

Under the above circumstances, and in view of the local nature of the question, it is not known whether the highest ranking commanding general delegated his command authority over the Kempetai in matters relating to defense to his subordinate Division commanding general or generals.

In the latter part of May 1945, or before that time, (it is believed at some time in March 1945), the South Seas Kempetai had already been deactivated and detached to the local 31st Army and had assumed the character of an Overseas Kempetai.

Regarding the deactivation of the South Seas Kempetai, it is believed that the gist of the order was sent by dispatch, but owing to the difficult communications conditions existing about this time between the islands and the Japanese Homeland, it is not known whether this order was actually received at all the islands.

In answer to the
Seventh Interrogatory

Whether the Commanding General of the Army had delegated the command authority of the Kempetai to his subordinate division or divisions is not known, as this was a matter within the authority of the Commanding General of the Army.

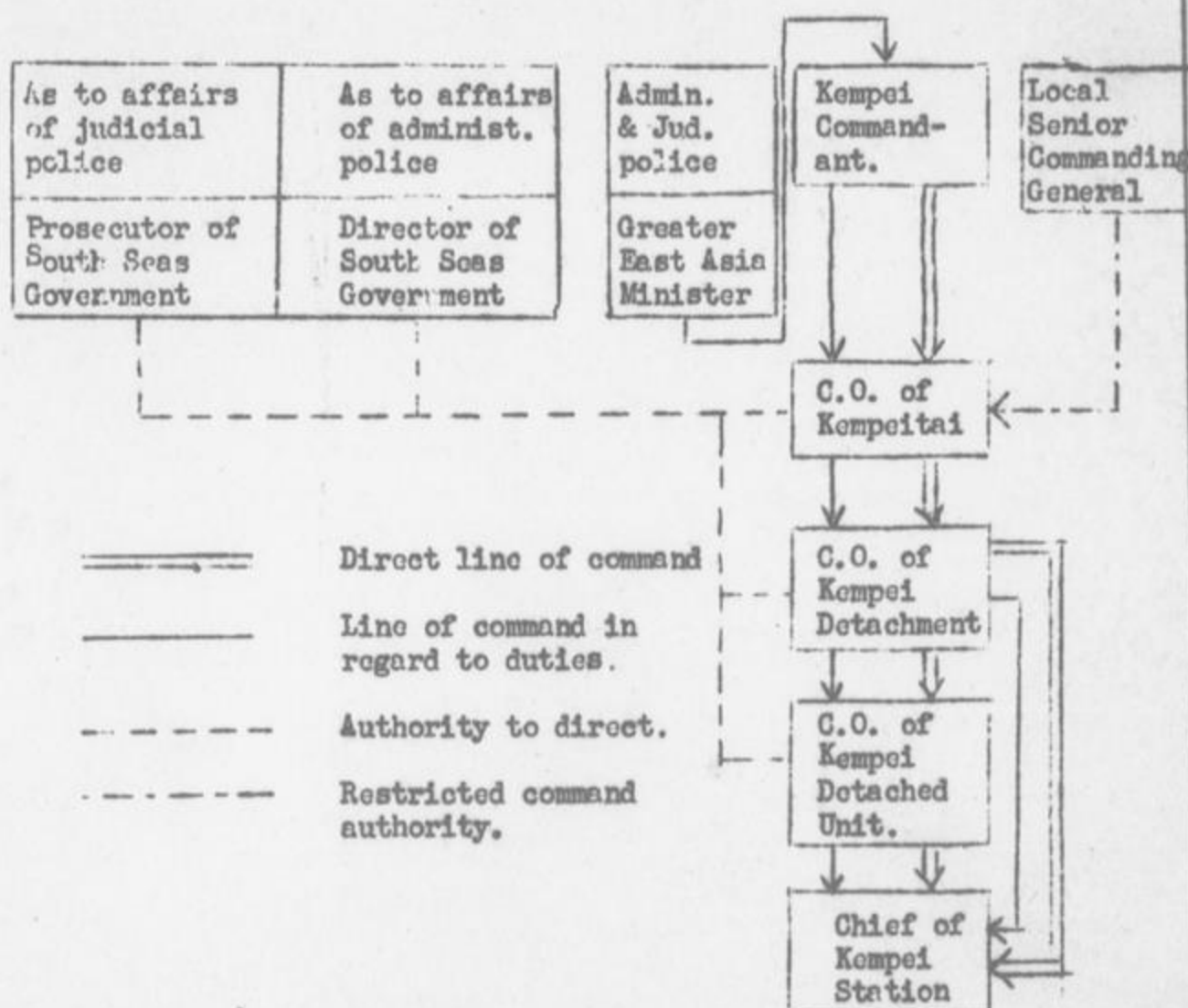
In answer to the
Eighth Interrogatory

Around September and latter part of December 1944, the Commanding Officer of the South Seas Kempetai was under the command of the Kempai Commandant. However, it is not known whether the Commanding General of the 14th Division had restricted command authority over the Kempetai regarding military police when it related to local defense. In this respect, the answer is the same as the answer to the sixth interrogatory.

In answer to the
Seventh Interrogatory

The important lines of command around September and December 1944 and the latter part of May 1945 are indicated in the following chart. With regard to the restricted command authority concerning defense of the highest ranking commanding general in the field, the answer is the same as that given for interrogatory six.

Around September and December 1944



Latter Part of May 1945



In answer to the
Eighth Interrogatory

Whether the Commanding General of the Army had the Kempai attached to the division under his command is not known as this was a matter within the authority of the Commanding General of the Army.

In answer to the
Ninth Interrogatory

Around September and the latter part of December 1944, the Commanding Officer of the South Seas Kempetai was under the command of the Kempai Commandant. However, it is not known whether the Commanding General of the 14th Division had command authority regarding military police concerning local defense over the Kempetai. On this point the answer is the same as that to the Sixth Interrogatory.

If he did have command authority regarding military police affairs concerning defense, its basis is as follows:

It was provided in the last paragraph of Article 3, Ordinance Governing Kempai (Imperial Ordinance), "In matters relating to military police connected with local defense, the Kempai in Japan Proper are subject to the restricted command authority of commanding generals of armies or commanding generals of divisions. In Korea they are subject to the restricted command authority of commanding generals of divisions, in Formosa under the restricted command of the Formosa Defense Unit, and in Saghalien subordinate to the restricted command authority of the highest ranking local unit commander. In the cases of remote and isolated fortified places where the foregoing regulations would be difficult to apply, the War Minister shall set forth the regulations.

In answer to the
Tenth Interrogatory

Same as the answer to the Seventh Interrogatory, Chart of Line of Command.

In answer to the
Eleventh Interrogatory

Regarding the duty and authority of the chief of staff of the division, it was stipulated as follows in the paragraph of the division chief of staff, 2nd Section, Part III, Higher Headquarters Service Order in War Time:

Article 57:-- The main duty of the division chief of staff is to assist the commanding general of the division. For this reason he should at all times be familiar with the intention of the commanding general of the division and assist him as the occasion demands as to his decision regarding the command of the division and shall be responsible for the accomplishment of the plans of the division. The division chief of staff shall submit to the division commanding general the various plans regarding operations and control and command of the division.

Exhibit 11(8)

Article 58:- The division chief of staff must at all times be acquainted with the general situation and shall attend to the replacement of soldiers and horses, secure food and medical supplies and arms, in order to maintain the full fighting strength of the division.

Article 60:- The division chief of staff shall also command and supervise the work of staff officers and under the command of the commanding general of the division shall control the general affairs of the headquarters.

In answer to the
Twelfth Interrogatory

In case of battle there are many occasions when the division chief of staff cannot receive the orders of the commanding general of the division each time. In such cases the division chief of staff often disposes of affairs on his own responsibility on the basis of the authority temporarily granted to him by the commanding general of the division or upon the basis of the intentions of the commanding general of the division. Even in these cases the division chief of staff usually reports the steps he has taken to the commanding general of the division for his approval.

In answer to the
Thirteenth Interrogatory

The acts mentioned in the above answer was not based on Japanese laws, but they were in conformance with Japanese military customs in respect to line of command.

ALLIED OCCUPATION FORCES }
TOKYO, JAPAN } ss.

I, Yoshio Kozuki, the Director, Demobilization Bureau, Repatriation Relief Agency, Japanese Government, being duly sworn on oath, state that I have read and understand the foregoing transcription of my testimony consisting of ten (10) pages, and that the foregoing testimony, obtained from competent authorities of the Japanese Government, is true to the best of my knowledge and belief.

Yoshio Kozuki
Yoshio Kozuki.

Subscribed and sworn to before me this 15th day of April, 1949.

Frederick F. Tremayne
Frederick F. Tremayne,
Lieutenant (junior grade),
United States Naval Reserve.

C E R T I F I C A T E

We, Frederick F. Tremayne, lieutenant (junior grade), United States Naval Reserve, and Elvin G. Gluba, yeoman first class, United States Navy, certify that on the 15th day of April, 1949, Yoshio Kozuki, the Director, Demobilization Bureau, Repatriation Relief Agency, Japanese Government, personally appeared before us and gave the foregoing answers to the several questions set forth therein; that the said Yoshio Kozuki, the Director, Demobilization Bureau, Repatriation Relief Agency, Japanese Government, read his testimony and affixed his signature thereto in our presence.

Frederick F. Tremayne
Frederick F. Tremayne,
Lieutenant (junior grade),
United States Naval Reserve.

Elvin G. Gluba
Elvin G. Gluba,
Yeoman First Class,
United States Navy.

Exhibit 11 (10)

0259

INTERROGATORIES

UNITED STATES

^{v.}
INOUE, Sadao, et al

April 1, 1949

The following interrogatories are requested to be propounded to WATANABE, Toshio, now residing in Japan, a witness for the defense in the above entitled case now being tried before the Military Commission convened by authority of Commander Naval Forces, Marianas (by precept dated 19 January 1949) in accordance with authorization of the Military Commission, subject to objections and exceptions, in accordance with the authority of Paragraph 6 of said precept, and the authority contained therein and rules of evidence promulgated by the Supreme Commander for the Allied Powers, SCAP ltr. A.G. 000.5 (5Dec45) LS, Subject "Regulations Governing the Trials of Accused War Criminals," especially Section 5d(1)(c) thereof, which authorizes the use in evidence of affidavits, depositions or other signed statements.

These interrogatories are respectfully forwarded to the Supreme Commander for the Allied Powers, Legal Section, Tokyo with the request that some suitable officer may be assigned to take, or cause to be taken, the deposition of the said witness thereon.

- First Interrogatory: State your name and present address.
- Second Interrogatory: Did you ever have duties in the Imperial Japanese Army?
- Third Interrogatory: Did you ever serve at the Japanese Army Installations on Palau Islands? If so, state the period.
- Fourth Interrogatory: State the name of the unit to which you were attached in May 1945 and your rank at that time.
- Fifth Interrogatory: Who was the commanding general of the 14th Division around May 1945?
- Sixth Interrogatory: What was your post and duty at the headquarters of the 14th Division?
- Seventh Interrogatory: Were you one of the officers attached to the Intelligence Section of the 14th Division?
- Eighth Interrogatory: Who was the senior officer in the Intelligence Section around May 1945?
- Ninth Interrogatory: Do you know whether there was an incident concerning prisoner(s) of war around May 1945 on Palau Islands (including Koror)?
- Tenth Interrogatory: What happened to the prisoner of war?
- Eleventh Interrogatory: Do you know whether a written order was made concerning the execution of the prisoner of war?
- Twelfth Interrogatory: Did you see the written order? If so, when did you first see it?
- Thirteenth Interrogatory: If you saw the written order, please state the contents of the order as detailed as possible. Do you know if this written order was in Japanese?
- Fourteenth Interrogatory: Did the written order bear the signature of the Division Commander, Lieutenant General Inoue when you first saw it?

Fifteenth Interrogatory: Do you know who prepared the written order? If so, state whom, and when it was prepared.

Sixteenth Interrogatory: Who was in charge of the custody of the original of the written order?

Seventeenth Interrogatory: If you were the person in charge of its custody, with what kind of document did you file the written order and when?

Eighteenth Interrogatory: Do you know whether the written order was printed at the Division Headquarters? If so, who printed it? When?

Dated at the Headquarters, Commander Naval Forces, Marianas, Guam, Marianas Islands, April 1, 1949.

Arthur G. Robinson
ARTHUR G. ROBINSON,
Rear Admiral, U. S. Navy,
President of the Commission.

Joseph A. Regan
JOSEPH A. REGAN,
Lieutenant Commander, U. S. Navy,
Judge Advocate.

Deposition

Toshio Watanabe, the witness above named, having been first duly sworn by me, Lieutenant (junior grade) Frederick F. Tremayne, United States Naval Reserve, the Commander Naval Forces Marianas Liaison Officer to Legal Section, General Headquarters, Supreme Commander for the Allied Powers, Tokyo, Japan, doth depose and say for full answers to the foregoing interrogatories, as follows:

To the first interrogatory: Watanabe, Toshio. Kagawa-ken, Marugame-shi, Kamijikata, 162-banchi, c/o IMAI, Seitaro. J.A.

To the second interrogatory: Yes, I did.

To the third interrogatory: I served on the Palau Islands from the latter part of April 1944 to 15 December 1945.

To the fourth interrogatory: I was attached to the 14th Division Headquarters. I was a first lieutenant, IJA.

To the fifth interrogatory: INOUE, Sadae, lieutenant general, IJA.

To the sixth interrogatory: I was in the Staff Intelligence Department. As for my duties, I was in charge of organizing the intelligence data and I took my orders from Major Yajima, the Staff Intelligence Officer.

To the seventh interrogatory: Yes, I was.

To the eighth interrogatory: Staff Officer Yajima was the senior officer in the Intelligence Section, and I was under him.

To the ninth interrogatory: Yes, I do.

To the tenth interrogatory: The prisoner of war was beheaded at the anti-aircraft unit on Koror Island by Second Lieutenant Katsuyama of the anti-aircraft unit.

To the eleventh interrogatory: No, I do not know.

To the twelfth interrogatory: I did not see it.

To the thirteenth interrogatory: As I did not see it, I do not know.

To the fourteenth interrogatory: I do not know.

To the fifteenth interrogatory: I do not know.

To the sixteenth interrogatory: I do not know.

To the seventeenth interrogatory: I never saw such a document among the documents in my custody.

To the eighteenth interrogatory: I do not know.

Toshio Watanabe
Exhibit 12(3)

ALLIED OCCUPATION FORCES }
TOKYO, JAPAN } ss.

I, Toshio Watanabe, being duly sworn on oath, state that I had read to me and understand the translation of the foregoing transcription of my testimony consisting of one (1) page, and that the foregoing testimony is true, to the best of my knowledge and belief.

Toshio Watanabe
Toshio Watanabe.

Subscribed and sworn to before me this 20th day of April, 1949:

Frederick F. Tremayne
Frederick F. Tremayne,
Lieutenant (junior grade),
United States Naval Reserve.

I, Frederick F. Tremayne, lieutenant (junior grade), United States Naval Reserve, being thoroughly conversant with the English and Japanese languages, certify that I truly translated the questions and answers given from English to Japanese and from Japanese to English, respectively; that after being transcribed, I truly translated the foregoing deposition consisting of one (1) page to the witness; and that the witness thereupon, in my presence, affixed his signature thereto.

Frederick F. Tremayne
Frederick F. Tremayne,
Lieutenant (junior grade),
United States Naval Reserve.

C E R T I F I C A T E

We, Frederick F. Tremayne, lieutenant (junior grade), United States Naval Reserve, and Elvin G. Gluba, yeoman first class, United States Navy, certify that on the 20th day of April, 1949, Toshio Watanabe personally appeared before us and according to Frederick F. Tremayne, lieutenant (junior grade), United States Naval Reserve, gave the foregoing answers to the several questions set forth therein; that after his testimony had been transcribed, the said Toshio Watanabe had read to him the same by Frederick F. Tremayne, lieutenant (junior grade), United States Naval Reserve; and the said Toshio Watanabe affixed his signature thereto in our presence.

Frederick F. Tremayne
Frederick F. Tremayne,
Lieutenant (junior grade),
United States Naval Reserve.

Elvin G. Gluba
Elvin G. Gluba,
Yeoman First Class,
United States Navy.

陸軍

證明書

自分美山要廠は厚生省引揚揚護復員局庶務課長の職に在る者なるを
茲に添付せる「中部太平洋方面艦隊上作戦」に關する防備統一要領
抜萃」と題する文書は當局保管に係る公文書の正確なる抜萃である
ことを證明する

昭和二十四年四月十九日

厚生省引揚揚護復員局庶務課長 美山要廠



中部太平洋方面艦隊陸上作戦に関する防備統一要領草案

「第三十一軍司令官の職務すべし諸島に於ける海陸軍部隊の陸上作戦・防空及航空作戦關係を除く」に關する防備の計畫及準備に關しては第三十一軍司令官其の統一に任ず

「マリアナ群島東部カリン群島（ノレマン）以東ボナペ島の諸島及び西方カリン群島（マツア、アングウルを含む）及小笠原群島に於ける海陸軍部隊の陸上作戦に關する防備の計畫並に準備は海軍が其の統一に任ず

「各島嶼の陸上作戦に關する防備は當該島嶼先任海軍指揮官（航空部隊指揮官を除く）之が統一指揮に任ず

而して該島内島嶼群は一の島嶼と見做すものとす

「本要領に於て陸上作戦に關する防備とは陸上戦闘近接砲撃射撃及之に伴ふ諸行動（配備・裝城・障礙物の設置・見張哨・通信）を指し航空作戦上必要なる航空部隊の行動・防空關係事項を含むとす

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Exhibit 13

0266

CERTIFICATE

April 19, 1949

I, MIYAMA, Yozo, Chief of General Affairs Section, Demobilization Bureau, Repatriation and Relief Agency, Welfare Ministry, do hereby certify that the attached is a true and correct excerpt from the official document entitled, "The Resume concerning the Unification of Defense of the Central Pacific Area Fleet in regard to Land Operation," (Chubu Taiheiyo Homen Kantai Rikujo Sakusen no Kansuru Bobitoitsu Yoryo) which now in my custody at this bureau.

/s/ MIYAMA, Yozo,

Chief of General Affairs Section,
Demobilization Bureau, Repatriation
and Relief Agency, Welfare Ministry.

Exhibit 13(a)(1)

0267

Excerpt from: "The Resume Concerning the Unification of
Defense of the Central Pacific Area Fleet
in regard to Land Operations."

1. The Commanding General of the 31st Army shall assume unified control over the plans and preparations for defense pertaining to land operations of the navy and army units on the islands to be secured for defense by the Commanding General of the 31st Army. (Except for those matters concerning air operations.)
2. The Army Area Group Commander shall assume unified command of plans and preparations for defense which pertains to land operations of army and navy units in the Marianas Islands, East Caroline Islands (islands east of Meroyon and west of Ponape) West Caroline Islands (including Yap and Angauru) and the Bonin Islands.
3. On each island the Senior Commanding Officer of the navy and the army shall assume unified command in regard to defense pertaining to land operations. (Excluding the Commanding Officer of the Air Corps). Islands inside an archipelago shall be regarded as part of that one island.
4. By the term "defense pertaining to land operation," in this resume it is meant actual fighting on land and close range firing of gun emplacements and other actions which accompany the foregoing (disposition of troops, building of fortifications, setting up of obstacles, watch, communications) but do not include matters pertaining to anti-aircraft gun activities and activities of air corps operating in conformance with the necessities arising from aerial operations.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

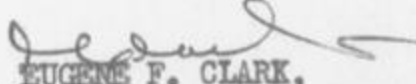

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 13(a)(2)

0268

NAVY NUMBER 3252
A17-10/ADJ:FOR-jfc

HEADQUARTERS, ISLAND COMMAND PELELIU,
c/o FLEET POST OFFICE, SAN FRANCISCO, CALIFORNIA

13 February 1946

From: Commanding General, United States Forces Palau.
To: Lt. Gen. Sadae INOUE, Commanding Japanese Forces Palau.
Subject: Statement concerning conduct and discipline of forces under your command since 2 September 1945 (date of your surrender of Japanese forces in the Palaus).

1. Since the date of your surrender, the Japanese troops under your command have conducted themselves in a most exemplary manner. Through you, they have carried out every order issued by this command with model precision. This is especially applicable to the clear up, from war damage, of the islands of Koror, Arakabesan, and Malakal.

2. Your own conduct since the surrender of your forces has been in keeping with the highest traditions of universal military ethics. You have accepted the results of defeat with dignity and humility. You have made no attempt to gain favor through false subservience. Your freely given statement that hope for the future of Japan lies in her willingness to discard the old system and, through the birth and development of new ideas and standards, to gain a respected place in the family of nations, is an indication of your personal sincerity.

3. In the event that you come in contact with United States occupational forces in Japan, you are free to use this letter as evidence of your conduct from 2 September, 1945 to 20 February, 1946.

/s/ F. O. Rogers
F. O. ROGERS.

A true copy. Attest:

Joseph A. Regan
Joseph A. Regan,
Lieutenant Commander, U. S. Navy,
Judge Advocate.

Exhibit 14

0269

(現地ニテ記スルモノ)

昭和二十一年三月十三日

発プアオ、諸島米軍司令官

宛プアオ、諸島日本軍司令官 井上貞衛中 將

昭和二十年九月一日(プアオ諸島ニ於ケル日本軍降服、日)
以降貴官指揮下、將兵、行動及軍紀ニ關スル件

一 降服、日以來貴官指揮下、日本軍隊ハ、最も模範
的ナ行動ヲ取レリ

余、命令ハ、常に貴下ヲ通シ模範的ナ正確サヲ以
テ完遂セラレタリ 殊ニ「コロール」島、「マラカル」島、「アラカ
ベサン」島ニ於ケル戦争損害ノ清掃作業ニ於テ然リ

二 貴軍降服、日以降貴下、行動ハ、萬國ニ普キ軍事
道義ノ最高度ナル傳統ヲ確保セシタリ

貴下ニ敗戦ノ結末ヲ受諾スルニ威嚴ト謙讓トヲ
失ハサリキ 屈從ヲ拒ミテ歡ニラ迎ヘントスルカ如キ
コトナカリキ

日本カ世界ノ國家群、中ニ尊敬サルヘキ地位ヲ獲
得セシカ爲ニ日本將來、希望ハ懸ツテ快、萬國態
勢ヲ放擲シ新ナル思惟ト規準ヲ創生發展
セシムルコトニ存スル旨喝破セラレタルハ、貴下ノ真
意、真面目ナル証左ナリ

三 歸還ノ曉ニ於テ、貴下カ日本占領ノ米國軍ト接
觸スルニ至リタル場合ニ、昭和二十年九月一日ヨリ

昭和二十一年三月二十日迄、貴下、行動ヲホス證據
トシテ此ノ書簡ヲ自由ニ使用セラレシ

エフ、オー、ロデヤース

Exhibit 14(a)

0271

宣 誓 書

良心に従ひ何等をも欺秘することなく又何事をも附加せず眞實を述べ
ることを誓ふ

昭和二十四年四月十日

宣誓者

開院春仁



新は多田督知と一九二二年四月神奈川縣立中野中を校と大
 る一に米陸軍士官学校、陸軍大を校と通じ、同級であり又同
 い東京小衛成地に勤務した場合が多かつたので外地勤務時の共
 同期間を際とは三十餘年に亘る絶えざる交友であり彼の人物
 に因しては新は最もよく知る所と自信するものがある

彼は生来人懐に厚く真面目であり極めて正義心が強く立派な人格
 者であると共に軍人としての勤務振りは責任感と服従心とに徹し

て居たとの一語に盡まるものがある。日本の軍人は上官に服従する
 ことを根本理念とすものであるが彼は其模範的人物でありまた
 従つて戦場に於ける彼の行動は彼が所属する母國長の命令に基い
 て行ふに止れど一矢報ゆる餘地もないことは永年になり彼に知る
 所の信じて疑はない所であり又彼は軍人としての教養の

207

外に高岡大なるんがともあり視野も廣く人生に因する見識
をも有し且博愛の精神を心得し佐官に昇進し其頃以後の
彼の思想的に核は此の基に在つたと思ふので惨虐行お
なは彼の發奮によつて行はれる筈は味とせし後不るが彼
を知らぬの責任ある利新でありや 若し彼の關係する新
隊に於て惨虐行おきか行はれた事實ありとすればそれは彼
としては拒否し得ない上官の命令に依るものなりとせれば部下
が彼を知らぬに勝平に於てたこの何れかと考へる外ない
のがあります 彼が鈍くまじ正義と博愛とを信奉する者
も人物であることを認言致しや

昭和二十四年四月十日

関谷春仁



Affidavit

Oath: In accordance with my conscience I hereby swear to tell the truth withholding nothing and adding nothing.

April 10, 1949

Affiant: KANIN, Haruhito. (seal)

I and TADA, Tokuchi entered the Kanagawa Prefectural Odawara Middle School in April 1916, and we were also classmates in the Military Academy and the Military Staff College. We had duty together in the Tokyo Army District nearly all of our military service, so we have been intimate friends for more than 30 years, and I believe I know well what he is like.

He was kind, honest, righteous and noble; he had a strong sense of responsibility and was obedient to his superiors as an Army officer. The most important virtue for a Japanese soldier is to obey orders and he was a model soldier in this respect.

Therefore, I who have known him for a long time believe that measures he adopted at the front were undoubtedly based on the order of the Commanding General to whom he was subordinate. Besides having a military education, he studied at the Imperial University. He had liberal views and a sound philosophy and loved all people. Such being his personality, I firmly believe that the cruelties with which he is charged could not have been of his own volition. If any cruelty had been committed by the unit to which he was attached, that might probably have been due either to the superior's order - which he could not reject - or to his subordinates' arbitrariness of which he was unaware. I testify that he is a perfect gentleman who believes in justice and philanthropy.

April 10, 1949

/s/ KANIN, Haruhito. (seal)

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

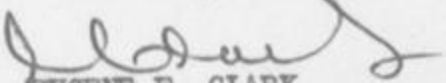

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 15(a)

0275

「我が多田君は、大佐と親しくなり、その結果明治十三年に陸軍大学校新設時代でありしに當時陸軍大学校に職員として在職せられた貴族方の一人から、それは多田君が明治二十二年下と思ふやうに「多田君知多住か」當時多田は多住をりしと思ふ。「日本読者論」なる本を書した其本は日本軍の戦争のやり方を述べたもので大體有益な本である又多田の人物も立派なものであるから一書合はれたらどうか」との意見最中がありしに彼は早速其本を買ひて見せしむが故に立派な本でありし故で直ちに多田に陸軍大学校に來て貰ひ副官としして本人の立派な意見を承つて居る人物であることを認めしに彼は多田を陸軍大学校の教官として雇て貰ふつもりで關係方面と交渉致ししにだが當時多田は其所屬の軍隊の職務上難れられまい事情にあつたので止むを得ず多田を副官として陸軍大学校に來て貰ひ學生に十數時間講義をして貰ふ事は使用多田の職務には相違致ししに多田の副官は日本軍に於ける天皇陛下の軍隊である關係に於て止むを得ざる場合のみ

この書は、日本の歴史を、その政治、経済、社会、文化の各方面から、詳しく説明するものである。本書は、日本の歴史を、その政治、経済、社会、文化の各方面から、詳しく説明するものである。本書は、日本の歴史を、その政治、経済、社会、文化の各方面から、詳しく説明するものである。

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中華民國二十六年四月二十二日

中華民國二十六年四月二十二日

中華民國二十六年四月二十二日

中華民國二十六年四月二十二日

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飯村 讓

0278

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Exhibit 16

0279

April 5, 1949

Character Testimony in Behalf of TADA, Tokuchi
by IIMURA, Joo

I, being duly sworn in accordance with the procedure followed in our country, do depose and say as follows:

1. I, IIMURA, Joo, upon being promoted to a major general, was appointed as an officer in charge of Research Division, Military Staff College, and then served in the college for two and a half years as the Secretary General and President until October 1939. In August 1939 I was promoted to lieutenant general. From October 1939 to October 1940, I was chief of staff of the Kwantung Army; from January 1941 to October 1941, the President of the Total Mobilization Research Institute; from October 1941 to October 1943, the commanding general of the 5th Army which was stationed in Manchuria; from October 1943 to March 1944, again the President of the Military Staff College; from March 1944 to December 1944, the general chief of staff of the Southern General Army; from December 1944 to June 1945, the commanding general of the 2nd Area Army which had its headquarters in the Celebes. After that I was transferred to a unit in the Japanese homeland.

2. It was in 1938 when I was the Secretary General of the Military Staff College that I became acquainted with TADA, Tokuchi, former colonel, IJA. One of the Imperial Princes, probably Prince Haruhito KANIN, was then attached to the Military Staff College. He told me that Major TADA (I believe he was then a major) published a book entitled "Principles of Japanese War"; that the book was a very excellent book explaining how to conduct a war by the Japanese forces; and that TADA was a man of fine personality. He suggested that I meet TADA. On reading the book, I found it to be excellent, and I requested TADA to meet me at the Military Staff College. When I met him I found that he had excellent views. I immediately got in touch with the authorities to invite TADA to the college as an instructor. However, TADA could not leave his post because of his duties. Having no alternative, I arranged to secure his services as a lecturer and to give lectures more than ten times for the students in my college. I, also, attended all of his lectures. TADA made his lectures on the following tenor: That the Japanese forces are under the command of His benevolent Imperial Majesty; and that a war should not be waged unless it cannot be avoided. He also stated that, after the outbreak of war, the Japanese forces should conduct themselves humanely as an army of benevolence and righteousness in accordance with the virtues of His Majesty the Emperor; that is to say, we should never enter on an inhumane war as not becoming His Majesty's army. I believe that his principles had a great influence upon the students. After that I exchanged letters with him, though we seldom were at the same station.

3. TADA had a firm belief as regards the true character of the Japanese forces. He wrote "Principles of Japanese War" not because he was requested to do so, but because of his eager desire to publish his idea in the Japanese army.

His book was read by Japanese officers to a considerable extent, and it is certain that this book, as well as his daily conduct, greatly influenced the people around him. This fact is brought out by his correspondence to me and also by the book's general reputations. When the battle on Pelaliu was at its height, the battle condition was reported everyday to the Southern General Army which was defending the area neighboring on Pelaliu.

Exhibit 16(a)(1)

0280

although that island was not under the command of the Southern Army. I always thought that everything would be alright because TADA was on Palau as the Chief of Staff, and I discussed it with my staff officers. After the end of the war, TADA was repatriated to the Japanese homeland. I was glad to know that he was exerting himself for the peaceful rehabilitation of Japan. However, when I heard that TADA was to be tried as a war criminal, I could not believe it was true because I know his personality. It is still my conviction that he could never have committed atrocities wilfully or intentionally.

April 5, 1949, in Tokyo.

/s/ IIMURA, Joo. (seal)

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.


EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 16(a)(2)

0281

死七部所書

東京都世田谷区上町二丁目八百七十五番地

一筆題名

宮崎有恒

明治三十四年十月六日

死者昭和二十二年三月六日死七部所書

証人

昭和廿四年四月廿日

東京都世田谷區長田村

東京都世田谷区馬場二丁目六番五号地

宮崎有終

保工族

張有終字子寧

父七宮崎有一郎長

男貞 七母

恒有奇宕

生由 觀 癸 卯 年 癸 月 乙 日

東京市竹芝区多摩郡松崎町二字不番分取西角也
王江司藤村子昭和十五年六月貳拾日官署認可有恒上坂昌順
出同留(籍)

和氣於心一或曰或曰自天有恒更之謂道

第

父 莊司繁樹

母	又	一	
---	---	---	--

千代子

出生日期 年 月 日

父	王世英
---	-----

每	天	一	次
---	---	---	---

2

三

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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生山 明 癸未 九月 秋 元

0283

Exhibit 17

0285

DEATH CERTIFICATE

Name: MIYAZAKI, Aritsune.
Permanent Domicile: 875 1-chome Kamiyama, Setagaya-ku, Tokyo.
Date of Birth: 6 October 1901.

This is to certify that the above named person died
on the 27th of February, 1947.

April 20, 1949.

TAMURA, Tamotsu (official seal)
Administrative Official,
Setagaya-ku, Tokyo.

I hereby certify that the foregoing is a true and complete translation
of the original document in Japanese, to the best of my ability.



Eugene F. Clark,
Lieutenant (junior grade), U. S. Navy,
Interpreter.

Exhibit 17 (a) (1)

0286

Permanent Domicile: 875 1-chome Kamiuna, Setagaya-ku, Tokyo.

Former Family Head: MIYAZAKI, Yuushuu

Family Head: MIYAZAKI, Aritsune. (deceased).

Ancestor of the Family: Warrior

Relationship with the Former Family Head: Grandson of MIYAZAKI, Yuushuu (deceased).

Father: MIYAZAKI, Yuuichiroo. (deceased)

Eldest Son

Mother: MIYAZAKI, Sada, (deceased)

Date of Birth: October 6, 1901.

Born at 78-ban-Yashiki, Kamiunorei-mura, Yoshiki-gun, Yamaguchi-ken; Father, MIYAZAKI, Yuuichiroo, reported the birth on 10 October 1901; KANESHIGE, Torasaburo, the register official of Kamiunorei-mura, received the report and registered the birth on 15 October 1901.

When the former family head, MIYAZAKI, Yuushuu died on 25 December 1917, Aritsune became the family head. This fact was reported by his mother, MIYAZAKI, Sada, and was registered on 8 January 1918.

Married with SHOJI, Chiyoko; reported and registered on 28 June 1930.

Reported the move of permanent domicile to 319 Oaza-Amagi, Fujito-machi, Kojima-gun, Okayama-ken. AKIYAMA, Koohei, Deputy Assistant Mayor of Fujito-machi received the report on September 9, 1935 and registered on September 11, 1935.

Died at 115 Oaza-Yumoto, Yuhara-machi, Tadaba-gun, Okayama-ken, at 7:30 a.m., on 27 February 1947. MIYAZAKI, Chiyoko, who was living with him, reported the death to MIMURA, Kan, Mayor of Yuhara-machi, on 10 April 1947, and it was registered on 15 April 1947.

Wife: MIYAZAKI, Chiyoko.

Father: SHOJI, Shigeki.

Second Daughter.

Mother: SHOJI, Suzu.

Date of Birth: 12 January 1909.

Second daughter of SHOJI, Shigeki, family head at 164 Oaza-Yoyogi, Yoyohata-machi, Toyotama-gun, Tokyo. Married with MIYAZAKI, Aritsune and reported the marriage on 28 June 1930 and was registered on the same day.

Husband Aritsune died on 27 February 1947.

Brother: MIYAZAKI, Kenji. (deceased)

Father: MIYAZAKI, Yuuichiroo. (deceased)

Second Son.

Mother: MIYAZAKI, Sada. (deceased)

Date of Birth: 19 September 1903.

Born at 7 Oaza-Nakaichi, Yamaguchi-machi, Yoshiki-gun, Yamaguchi-ken,
MIYAZAKI, Yuuichiroo, father, reported the birth on 27 September 1903.
WATANABE, Kengo, a register official of Yamaguchi-machi, registered the
birth on 30 September 1903.

Died at 126 Aza-Furuyashiki, Asiya, Seido-mura, Muko-gun, Hyogo-ken
at 10:00 a.m. on 16 December 1935. MIYAZAKI, Aritsune, the family head,
reported the death and the death was registered on 23 December 1935.

I hereby certify that the above to be a true copy of the original
register document.

10 April 1949

TAMURA, Tamotsu (official seal)
Administrative Official,
Setagaya-ku, Tokyo.

I certify that the foregoing is a true and complete translation of the
original document in Japanese, to the best of my ability.

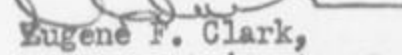

Eugene F. Clark,
Lieutenant (junior grade), U.S. Navy,
Interpreter.

Exhibit 17 (a) (3)

0288

人格証明書

家庭人としての夫貞術は表面嚴格に見えて内面は
非常に温情主義の人でした。いさゝか感傷的ですが
あつても改いも悲しきも決して表現する性質でした。妻子、弟妹
又友人に対しても常に正義と幸福を希望し過失
があれば泣きながら責め、幸福を持つては泣きながら改む
のを常でした。したがつて残忍な人好や冷酷な人好

は平常極端に憎むおゐました。
家庭に出入する人々に対しても同様で自己の犠牲に於て
他人の幸福を樂しみ悦びとてゐました。

善通寺に居りまゐる時馬丁の病ました時は自ら軍医
を連れて毎日見舞ひを為す馬丁のあつひやうに感謝
されたい事がある又横濱高等工業学校に配属された時
予より親を仰ぐと親しめ殊に合意した事などは

自分の存在と同じ愛情を失し度々家庭に入れ食事も
其の妨がりました。不自由は品物のあれば之を身代へた事
も度々ございました。

軍人としての真摯は平常責任感の強い人である
部下の將校の多くを導く。戦争の事は家庭では
殆ど語りません。其家族の者は詳しくは知る事
出来ません。終戦の時米軍指揮官ロジャース代將と

非常に友好的に戦後の処理を完了しロジャス大將
より親愛な感謝状を贈られ、此の感謝状は家室と
して子孫に傳へるものであると満足してゐるに、以上の如く夫
貞衛の性格を妻として深く信じてゐます。右の如く事共
以推察するに、以同情溢れるお救ひを賜ふんことを
ここにばてしてお願ひ申し上げます。

一九四八年八月五日

井上貞衛の妻

井上やう

August 5, 1948

/s/ INOUE, Michi,
Wife to INOUE, Sadae.

Testimony to the Personality of INOUE, Sadae.

As a member of our family, my husband was apparently strict, but actually quite warm-hearted. He was rather too sentimental and used to shed tears easily both in sorrow and in joy.

In dealing with his family and other relatives and friends, justice and happiness were his two principal mottoes. Whenever any of them were ~~wrong~~, he chided him or her in tears, and whenever any of them were happy, he expressed his joy also in tears.

Therefore, it may be easily imagined that he excessively hated a cruel feeling or a brutal act.

This attitude of his was just the same toward his subordinates or inferiors.

To cite a few examples, while we lived at Zentsuji, his groom became ill.

At that time he was busy as usual, but he went every day, accompanied by a surgeon, to inquire after the health of his sick groom. Of course, the groom was exceedingly grateful for his kindness.

While he was attached to the Yokohama Higher Technical School as a teacher of military training, he was liked by his students. He was known by his nickname of "My Daddy."

Indeed, he was a "daddy" to all the students, especially to the poor ones.

Often he invited the poorer students who are away from their homes, and treated them to dinner. Many times, he gave various items of stationery to the students who were hard up financially.

As a soldier, he was strong in the sense of responsibility, so I hear.

He seldom spoke of things military at home, but I know that immediately after the end of the war, he was totally co-operative with the American commander, Brigadier General Roger, who cordially gave him a letter of thanks.

He repeatedly told us to keep this letter of thanks as a family treasure.

The above mentioned is a profile of his personality.

I humbly beseech and implore to you to understand his personality and be clement and merciful toward my husband.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

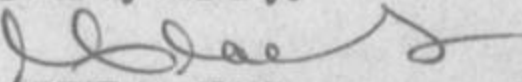

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 18 (a)

0293

人格證言書

私達は此處に私達の家庭生活に於て父が受けた教育の印象の中から最も感動の深かった例を挙げて父の人格證言と致す

父は自頃身を持するに幾多の職業があり非事にも憤りに篤く子煩悩であり隣人の家庭に病人が有ると医藥を予え軍医をも薦めた事があつた。軍人としては珍しく酒を好まずでゐた。

父が大尉少佐の時氏には曰く陸軍には明治維新より存続した義闘があり之に關はるる父は不遇の裡に軍人生活を送り幾度か母に退役したい希望を洩して居ました。

(一) 父が斯様になつたのは陸軍内務の部の義闘の事柄を

憎む氣持で軍人としての使命が父に与つたもので其の地獄であつたと申すのは上官の命の下に人の父であり人の子である義闘の部下の將士が敵味方互に相殺戮する悲惨な戦場に赴くを見るは人一倍涙もろい父としては軍人としての彼と人間としての彼との間の深刻な葛藤に陥つてゐたのであつた。

此事を哀言する事案として父は自頃「吾々は五人の健康な男兒を持つる者が將來又して軍人にはさせよう」と申して居りました。實際私達が中學校を卒業する頃は世も拳銃軍國主義の時代であつたので義闘の軍人の子弟がたゞであつた。私達も父の跡を繼いで軍人になるために陸軍士官學校を受験しその希望を父に

(二)

傳えた時父は固く之に反対教しませ

私達は軍人であり作らぬ軍人生活は厭ふ父の企中の疑問を察する事が出来ず当時吾等の意に打たれたが有る。又私達の両親が隣人達に「此等は五人も立派な男児を持ち作らへん軍人になせぬのは何の理由が有りますか」と尋ね質問された當惑しめる姿を幾度も見受けませ

私達は陸軍幼年学校や陸軍士官學校に入れば軍人の子弟として幾多の特典が与へられと云ふが、軍人の経済生活には苦しい高價な學費を父等とする大學の法學部経済學部或は醫學各部に入學し文化人として平和な市民としての教育を受けさせられませ

(三) 父は又欧米の文化に深い関心を持ち軍人としては欧米の文化に

接する機会が稀である爲私達に英語を研究して欧米の文明を學ぶ様に教えて居りませ偶々二男は中學校代より英語に興味を持ち探になん事を言ふ彼も貿易会社に就職せしめ海外に派遣され欧米の文化を道入する事を樂しみにして居りませ

一九四六年三月、父は高血圧を復發して参りませ父も私達も通費に迎へませ其時父は佛教の僧侶のやうに有る珠数を懸けて居りませ其姿を見た時私達は父の心境に重大な一轉機が訪れる事を直感教しませ

父の永く軍人生活の中に全張した幾多の戦争中最も残酷である過去年間の戦斗を過して彼が幾多の尊い生命が一挙にして失はれる人類の悲劇を痛嘆し戦争による

(四)

多岐の犠牲者もあつたが世を捨て、余生を宗教界に
送る決心をしてゐたが、思つて父は敗戦による退去
数年に及ぶ軍人生活を離れる事には、軍人としての父との
親としての父との深刻な相克の煩悶から解放されてゐる
が、

此の世紀の材料とも言える軍事材料が、正且最痛
くあり且つ其の管理を一貫する思想が博く人類愛と
永遠の真理とに立脚し人類を二度戦争の渦中
に投ぜざる神の御聲とて實文である事を祈る
次第である。

以上

(2)

一九四八年七月二十日

井上通子

井上真一

井上弘子

井上烈子

井上史子

井上悠子

井上美子

井上善夫

井上雄雄

井上親子

(X)

Exhibit 19

0297

July 25, 1948.

TO: SUPREME COMMANDER
FOR ALLIED POWERS

Dear Sir:

PETITION

We, stating some examples out of our deep impressions given by our father (Sadae Inoue) in our home life, hereby beg to testify to his personal character.

He was a man of upright conduct and of humanity, and was very fond of his children. If there were patients in his neighbors, he was warm-hearted enough to give them medicine and send the surgeon to them often.

He was one of the uncommon soldiers who did not use liquor.

In his captain and major days, there were cliques which had been existed since the Meiji Restoration in the Japanese Army. He had nothing to do with any of the cliques, so he was in adverse circumstances. He used to tell his wife (our mother) that he would like to retire from the army. This state of mind was a result of his detestation for the arbitrariness of some cliques and from his responsible position according to advancement of his rank.

Because he was a superior officer, he had to order his many subordinates to enter the tragic battle-fields. He was such a soft-hearted man that he did not have the heart to be in such a position; in other words, he was in a dilemma as a father and a superior officer.

This will be clearly shown by the following fact!

He used to tell his wife, "We have five stout boys, but we will never make them soldiers." In fact, in our middle school days, militarism was in full flourish and when we ask him to apply to the Military Academy for admission for us, just like the sons of other soldiers did, he opposed us firmly.

This struck us as strange at that time, but now we recognize his dilemma as a soldier.

Besides, we have noticed often that our parents were perplexed when they were asked by the neighbors, "Why don't you make at least one of your boys a soldier as you have five fine boys."

If we had entered the Military Preparatory School or Military Academy we would have been given many privileges as sons of a soldier, but according to our father's policy, we entered the law, economic, and medical department of the university and received cultural education in spite of the economic difficulties.

He was keenly interested in western cultures and used to tell us to study English well so as to learn the civilization of Europe and America.

Exhibit 19 (a)(1)

0298

He was very much pleased that his second son had been interested in English since his middle school days, so he had him enter some trading company.

He hoped that the son would be transferred overseas and would be introduced to western culture.

When we met our father at Uraga, after his repatriation from Palau Islands in March 1946, he hung beads around his neck as a Buddhist priest. When we saw this we knew intuitively that the state of his mind had been greatly changed.

At that time, he was resolved to devote his rest life to pray for the war-dead.

In accordance with the discharge from military service he could dissolve this dilemma with which he had been troubled for the past ten of years.

We hereby heartily implore that you would be so kind and lenient as to pass an humane and fair judgement upon him.

Yours faithfully,

/s/ Michiko Inoue.
/s/ Hiroko Inoue.
/s/ Teruko Inoue.
/s/ Teiko Inoue.
/s/ Yoshiko Inoue.
/s/ Shinichi Inoue.
/s/ Kowashi Inoue.
/s/ Ken Inoue.
/s/ Yoshio Inoue.
/s/ Norio Inoue.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

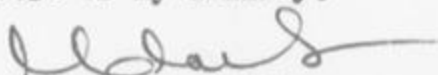

EUGENE F. CLARK,
Lieutenant (junior grade),
U. S. Navy,
Interpreter.

Exhibit 19 (a)(2)

0299

神奈川県三浦郡葉山町堀内一五七

供 送 者 井上 弘子 (印)

私儀、我國に於て行はれる法式に従ひ先づ別紙の如く宣誓したる後、次の如く供述致します

昭和二十四年 二月二十七日

宣 誓 書

良心に従ひ何等をも欺秘することなく又何事をも附加せず眞實を述べ
ることを誓ふ

昭和二十四年二月二十七日

宣誓者

神奈川県三浦郡葉山町内二丁目
井上 弘子



供述書

スベモアザイマセシガ 神奈川県三浦郡葉山町堀内ヨシセ

井上弘子

私ハ井上貞衛ノ長男ト眞一ノ妻デゴザイマス 現在葉山ニ於テ

夫ト眞一、本年五才ノ長男章孝、弟善夫、矩雄ト五人デ父

井上貞衛ノ留守ヲ各人最善ヲツツシ、心ヲ合セテ愛ヘラレタ

仕事ニ勤メイソレンデ居リマス

私共夫婦ハ三年前、秋満洲ヨリ赤子ヲ連シ無一物デ引揚テ

マイリマシタ、ソノ時父ノ実ノ娘ニ対スルヨリイ優レク教ヘテ

頂キマシタ教々ノ言葉トオ姿ヲ今モワテ忘レルコトガ出来マセン

ソノ一ツトシテ、イカナル時ニモ、イカナル人ニモ、コトニ弱キ者ニハ愛ヲ持テ

相對セヨト、又イカニ苦シクモ決シテ不正ナコトヲセヌヨウト、私達一家ノ

行々道ヲ優レク細カニ教ヘ下サイマシタ、今アノイ優シイ父上ガ

戦犯容疑者トシテ裁キノ庭ニオラレマスコトヲ考ヘマス時、私共ノ胸中ハ

悲シミデ一杯デゴザイマス、ドウヨウテ罪ニ問レテカハ、クワレク知

NO. 1.

No. 2.

スベモゴザイマセンが平常ノ父ヲ知ル 松共ニトツテソレハ父ノ本心カラデハ
ナイコトヲ十分ニ知ルコトが出来ルデゴザイマス。何カ一裁判長様様
ソノ任ニ有ル方々、父井上貞衛ノ具ノ姿ヲ十分以調査下サイ
マシテ、ソノ上、御寛大ナル御配慮ヲ心カラお願い申上ゲル次第
デゴザイマス。

Exhibit 20

0303

INOUE, SADAE and IADA, TOKUICHI (28 MAR 1949)

(VOL. III)

(168346)
PART 2 OF 3

0304

Affidavit

Oath: In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

/s/ INOUE, Hiroko. (seal)

Affiant: INOUE, Hiroko, (seal)
1057 Horiuchi, Hayama-machi,
Miura-gun, Kanagawa-ken.

Having been duly sworn in accordance with the procedure followed in my country, I do hereby depose and say as follows:

I am the wife of Shinichi, the eldest son of INOUE, Sadae. I am now living at Hayama with my husband, Shinichi, my five years old son, Yukihiro, and the brothers of my husband, Yoshio and Norio, taking care of our house during the absence of INOUE, Sadae.

Three years ago, Shinichi and I were repatriated from Manchuria with our baby, and came back penniless. I have never forgot the warm hearted instructions which my father-in-law gave me at that time, in a very affectionate manner as if he were talking to his own daughter. He told me to love anybody, especially those who were weak, at all time. He instructed me what to do by saying that no matter how painful my life would become I should always be righteous. When I think that my dear father-in-law is to be tried as a war criminal suspect, I am filled with grief. I know nothing about the reason of his trial, but I know full well that he could not do anything wrong of his own accord. Your excellencies, the president, and members of the commission, I beg you to carefully examine the real character of my father. I pray that you will be merciful toward him.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

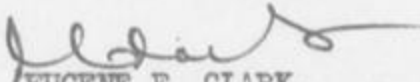

EUGENE F. CLARK,
Lieutenant (junior grade),
U. S. Navy,
Interpreter.

Exhibit 20 (a)

0305

供 述 者

井 上 剏

私紙、投函に於て行はれる法式に従ひ先づ別紙の如く宣誓したる後次の如く供述致します

昭和二十四年 〆 月 〆 日

0306

宣 誓 書

良心に従ひ何等をも欺秘することなく又何事をも附加せず眞實を述べ
ることを誓ふ

昭和二十四年二月二十五日

宣誓者

井上 剛

0307

伝 達 手

東京北谷五郎興野大文子

井 上 野

お井上貞衛の弟である。兄の軍人子弟が彼等。父
職業主として軍人になるという不文律を有し、母兄弟と同様
軍人になる志望を父から抱き、東京帝國大學法學部に参
法學と經濟學を専攻し、現在兼松林文會社の社員として
貿易業務に携はつてゐる。

父は正義觀念を重く又隣人愛に富み、人下である。即ち義理
に於て才二郎の事柄を一切承けた時、近所に松崎と云ふ人、教養屋
経営し、父と彼に親しく隣り交際を致し、その名譽を尊ぶ
軍人の家系といふ松崎氏と交際する事を非常に嫌ひ、辱ら

父は忠告致し、お井上は父はたとへ職業は賤しく共人間として平等に
交際すべきである主張し、その忠告を容れず、その為松崎氏は
非常に感激し、永く交際致し、お井上に戦争が激しくなる
に不承不慮に決する處あり遂に教養屋を閉し、僧侶とな
り、從軍僧として戦線に参り父の側近に従ひ、常に敵味方の戦死者
の冥福を祈る事となる。

斯る性格の父が正義の爲には自己の地位を顧みず隣人愛に富み
お井上を義と人道に教へ、その行為は絶対にお井上は断言
致す。お井上は心にいふ、父なる裁判を行はる事を祈る事。

昭和四年五月

井 上 野

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Exhibit 21

0309

AFFIDAVIT

Oath: In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

February 27, 1949.

/s/ INOUE, Kowashi. (seal)

Affiant: INOUE, Kowashi, (seal)
546 Ooto, Yono-machi,
Kitaadachi-gun, Saitama-ken.

Having been duly sworn in accordance with the procedure followed in my country, I do hereby depose and say as follows:

I am the second son of INOUE, Sadae. In spite of the unwritten custom that the sons of military officers ordinarily had to become military men to succeed into their fathers' profession, my brothers were not allowed to do so. I studied law and economics at the Jurisprudence Section of the Tokyo Imperial University, and am at present engaging in trade business as an employee of the Kanematsu Company.

My father had a strong sense of righteousness and deep affection toward his neighbors. When he was a staff officer of the 11th Division at Zentsuji, there was a man called Mr. Matsuzaki in our neighborhood who was running a Geisha house, and my father treated him kindly as one of his neighbors. My father's comrades did not like my father's attitude. They advised him that he, as a military officer who respected honor, should not be intimate with Mr. Matsuzaki. However, my father did not accept their advice, telling them that one should be friendly toward any person on equal basis, no matter how humble his occupation might be. Mr. Matsuzaki was greatly moved by my father's attitude and he was very friendly toward my father for a long time. Then the war became very intense, and Mr. Matsuzaki, for some reason decided to close his Geisha house and became a priest. He then became a chaplain and served my father at the front praying for the repose of the souls of the dead soldiers, both of our forces and of the enemy.

Such was the character of my father. He did not care for his position for the sake of righteousness, and he loved his neighbors. I affirm that he could not commit any act in violation of righteousness and humanity. I beg that you will afford him a fair and lenient trial.

February 27, 1949

/s/ INOUE, Kowashi.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

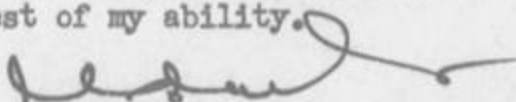

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 21 (a)

03 10

供述者

井上 トモエ



私儀、我國に於て行はれる法式に従ふ先づ別紙の如く
宣誓したる後次、如く供述致す

昭和二十四年二月二十七日

宣誓書

良心に従ふ何事をも黙秘することなく又何事をも
附加せず真実を述べることを誓ふ

昭和二十四年二月二十七日

宣誓者 井上トモ子

供述書

埼玉県立郡興野町大正

井上トモエ

私は井上剛の妻であります。

私の実父兄五郎は神奈川の信託下で生前ハワイ島に
あつて永く日米米国人に信託の生活を送つた者でありし
和は幼時より東京の環境の中に教育されて育つた。

私の信託する夫の人格を見ても夫の父井上貞衛は
家庭において子弟を教育するに常に厳格であり、正義を
尊ぶ隣人には慈愛を以て持つる事に指導して来られた
事事が明瞭に判断出来る。

斯様な性格の父井上貞衛が正義と人類愛に

信じてゐる行動を教つた事は絶対に信じてゐる事を
供述して、實大の裁判が行はれる事を祈ります。

昭和廿四年二月廿日

右 井上トモエ

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Exhibit 22

03 14

AFFIDAVIT

Oath: In accordance with my conscience I swear to tell the whole truth
withholding nothing and adding nothing.

February 27, 1949.

/s/ INOUE, Tomoe. (seal)

Affiant: INOUE, Tomoe, (seal)
546 Ooto, Yono-machi,
Kitaadachi-gun, Saitama-ken.

Having been duly sworn in accordance with the procedure followed in
my country, I do hereby depose and say as follows:

I am the wife of INOUE, Kowashi. My father, KODAMA, Kaiseki, was a
Buddist priest of the Zen Sect who devoted his life to missionary work for
the Japanese-Americans in the Hawaii Islands, and I was brought up in
religious environment during my childhood. Judging from the character
of my husband; INOUE, Sadae, father of my husband, was very strict about
the education of the children at home, and taught his children to honor
righteousness and to have love and kindness toward their neighbors.

I cannot believe that my father-in-law, INOUE, Sadae, who is a man
of such character, could commit actions against righteousness and humanity.

I pray that you be lenient with him.

/s/ INOUE, Tomoe. (seal)

I hereby certify the above to be a true and complete translation of
the original document in Japanese, to the best of my ability.

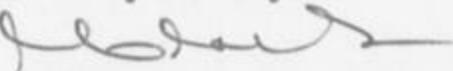

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 22 (a)

03 15

供述者

井上輝子^(井上)

私儀 我國に於て行はれし法式に従ひ先づ別残の如く宣誓
したる後次の如く供述致しませう

昭和二十四年三月二十七日

宣誓書

良心に従い何事をも黙秘すこととなく又何事をも附加せず
眞実と述べる事を誓ふ

昭和三十四年二月二十七日

宣誓者

井上輝子 (井上)

供述書

横浜市鶴見区鶴見町三九番地

井上輝子

私は井上貞衛の三男井上堅の妻、普通女子
Y.W.C.A.を卒業し、昭和三十年十一月に結婚し
現在に致ります。義父井上貞衛と極く僅か
の日教養生活と事なく、深くは信じ上げまゝに
病弱な私の健康と常に痛くやに配り、又
私の子供が生まれる時大変可愛がる所、
僅かの期間に想ひを込めて非常に曲る事。
不嫌いな幼見、格に純粋な心で子供を
方と思ひます。
私の義父、子供、不祖父、神様、お恵み
裁判、お寛容と仰ぐ所願を申し上げます。

右 井上輝子(井上)

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Exhibit 23

03 19

AFFIDAVIT

Oath: In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

February 27, 1949.

/s/ INOUE, Teruko. (seal)

Affiant: INOUE, Teruko, (seal)
292 Tsurumi-machi,
Tsurumi-ku, Yokohama.

Having been duly sworn in accordance with the procedure followed in my country, I do hereby depose and say as follows:

I am the wife of INOUE, Ken, the third son of INOUE, Sadae. I was graduated from the Friend Girls' High School, Y.M.C.A., and was married in November 1945. Since I have known my father-in-law, INOUE, Sadae, only for a short time, I don't know him very well. However, I do know that he was always anxious about my health, as I was very weak. He loved my baby very much. During my acquaintance with him for this short period, I have known that he is a very righteous man and is very pure-hearted like a child.

I pray that God be merciful to my father-in-law, the grand-father-in-law of my baby. I beg that you will try him leniently.

/s/ INOUE, Teruko. (seal)

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

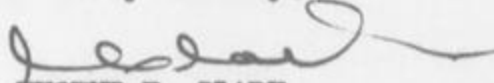

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 23 (a)

0320

神奈川縣三浦郡葉山町振内一〇五七

供 述 者

井 上 善 夫 

私儀、我國に於て行はれゝ法式に従ひ先づ別紙の如く宣誓したる後次の如く供述致します

昭和二十四年二月二十七日

宣 誓 書

良心に従ひ何事をも欺秘することなく又何事をも附加せず眞實を述べ
ることを誓ふ

昭和二十四年 二月二十七日

宣誓者

神奈川県三浦郡葉山町堀内一〇五七
井上 善夫 (印)

供述書

神奈川県三浦郡葉山町堀内 一〇五七

井上善夫

私ハ井上貞衛ノ四男デアリマス。 体ノ弱カッタ幼少ヨリ父ノ温イ心ニ抱キテ育チラレタ私ハ、ソノ希望ニ報ユルベク 日本医科大卒ニ入卒シ現在 最高 今年ノ過程ヲ終ラントシツアリマス。

私ヲシテ將來、 廣ク人類ノエニ 最大ノ恩師ト苦痛ノ原因トナリ、 ソシテ介奉ト悲歎ノ結果ヲ来ラス病ト戦ヒ、 タトヘ我が身ハ倒レルトモ一人デモ多クノ人ヲ生命ヲ保全シ、 國境ヲ越エテ愛ノ手ヲサシノベ、 美シキ人類愛ニ生スルベク教育シテ下サタタ、 ソノ父ガ今、 異國ノ裁キノ庭ニ立タナケレバサライコトヲ聞キ、 全ク信ジラレセシ。

善夫ヨ、 一日モ早ク 医学ノ道ヲ終エテ、 社会ニ出デ 白衣ノ如キ清キ心デ、 病ナル介奉ヲ人々ニ 誰ニデモ傳受ノコトヲサシノベルオ前ヲ見ルカ何ヨリモ 樂シミダト常ニ言ハタタ、 心ノ奥ニ燃ユルガ如キ人類愛ノ温キ気持ち、 眞心ヲ 本當ニ理解シ一苗ヲ知ツテナルウ 私達兄弟デアリマス。 シカルガ故ニ

No. 2.

此ノ度ノ事ハ何ヲ問ハレテナルカヲ知リマセンガ、例ヒ何カヲツタニシテモ、ソレハ
本當ニテノ父ノ私ニ人類愛ヲ教エテキリ、其時ヲ出タモリデハナク、何カノ
間違エデハナキト思ハレ、眞ニ父ヲ知ル私ヲ戦犯容疑者トシテノ父ヲ
口ニスルコトヲ出来ナイ其時デ一介デス。
私ノ一日モ早ク、立派ナ医者トシテ世中ニ出ルコトヲ希望シ待チコガレテナル
父、私達兄弟ヲ、日常ノ事ヲ人々ノ爲ニ犠牲トナリ、此ノ同情ト
博愛ノ心ヲ持テト教ヘ育ンデタ父ヲ、
裁判長殿ヲ始メ、之ヲ関係サル
カネモヤ介ニ此理解下ナレト云ハル迄、置ヲトラシメトテ、お預ヒスル次第
デアリマス。
(寛恕)

AFFIDAVIT

Oath: In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

February 27, 1949

/s/ INOUE, Yoshio. (seal)

Affiant: INOUE, Yoshio, (seal)
1057 Horiuchi, Hayama-machi,
Miura-gun, Kanagawa-ken.

Having been suly sworn in accordance with the procedure followed in my country, I do hereby depose and say as follows:

I am the fourth son of INOUE, Sadae. I was very weak in my childhood but I was brought up under the deep affection of my father. I entered the Medical University of Japan and am going to be graduated.

My father afforded me the university education so that I could help cure the diseases which are the cause of fear and pain, and bring misfortune and grief to mankind. He taught me to exert myself to save as many people as possible, to love foreign people, and to live an exemplary life for humanity. I can hardly believe that such a good father must stand trial in a court of a foreign country.

My father used to tell me, "Yoshio, you have got to study hard to be a doctor. I shall be looking forward the day when you will enter the world to aid the sick and the unfortunate, with a heart as clean and pure as the white robe of a doctor." I believe it is not exaggerating when I say that it is we, his sons, who truly understand and fully know the warm humanity and sincerity of our father. We don't know why he is to be tried. We believe that, no matter what happened, it might be some mistake, and not the intention of my father who used to teach us the love of mankind. Since I know my father very well, it is impossible for me to call him a "war criminal suspect."

It is my father who anticipates my becoming a doctor. It is my father who taught us to love and sympathize with unfortunate people even at the sacrifice of ourselves. Your excellencies, the President, and members of the commission, please understand him and give him a fair and lenient judgment.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

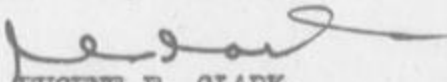

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 24 (a)

0325

神奈川県三浦郡葉山町堀内一〇五七

供 述

者 井 上 矩 雄 

私儀、我國に於て行はれる法式に従ひ先づ別紙の如く宣誓したる次第
の如く供述致します

昭和二十四年二月二十七日

宣 書

良心に従ひ何等をも欺秘することなく又何事をも附加せず眞實を述べ
ることを誓ふ

昭和二十四年 二月二十七日

宣 書 者

神奈川県三浦郡葉山町堀内二番
井上矩雄

供述書

神奈川県 三浦郡葉山町板内一五七
井上 矩雄 井上

私ハ井上貞衛ノ五番目ノ息子デアリマシテ、常ニ父ノ膝下ニアリ、父ヨリ非常ニ愛サレ又一面、強ク正シイ教育ヲ受ケタ着デアリマス。先日、私が最も愛シ尊敬スル父ガ巢鴨拘置所ニ入り現在、グワム島ニ於テ裁判ヲ受ケル身トナツタ父ノ運命ヲ思フ時、正ニ身ヲ裂カレルヤウニ悲シウゴザイマス。現在、私ハ父ノオ蔭ヲモクマシテ、東京ノ法政大學デ人類ノ爲、世界平和ノ爲ニ教育ヲ受ケテオリマス。一方、家庭ノ経済的事務ニヨリマシテ G. H. Q. ノ経済科學局ニ勤務サセテイタダイテオリマス。私ノ事務所ニ於テ直接アメリカ人の人々ニアメリカノ統計學ヲ教エラレテオリマス。ソシテ毎日接スル

アメリカ人の寛大さ、博愛心、強さ、心、ウタレ、感、
 激シテアリマス。又、アメリカ人ヲ通シテ知ルアメリカノ
 スベテカ、面ニ於ル優秀サニ驚キ、日本モ大イニ、ア、カ、
 ニ、學、バ、ネ、バ、ナ、ラ、ヌ、ト、思、ツ、テ、ア、リ、マ、ス。
 私ノ父ガ、私達ヲ教育スル時ハ何時デモ、他人ニ親切ク
 デアレト、他人カラ思フ仇デ返サレデモ他人ヲウケムト
 ソシテ自分ノ信ジル道ヲ正シク歩ケト言ヒマシタ。父ハ大ナル
 永年父ト一緒ニ生活シテ来マシタ。私カラ、父ノ性質ヲリ
 見マスト、父ハ非常ニ同情心ガ深ク、人ヲ愛スル力ガ強
 カッタ。私ノ家ハ、常ニ父ヘノ訪問者デ、一杯デアリマシタ。
 ソシテ常ニ動物ヲ愛シ、犬ヤ小鳥ヲ飼ツテヨリ、以前、父ノ
 可愛ガッタ犬ガ死ニダ時ハ泣イテアリマシタ。ソシテ父ハ情
 ニ弱イ人デアリマシタ。一面、大變頑固デ、融通性ガナイト
 思ハレル。正義觀ガ強クアリマシタ。ソウイウ父ノ性質カラ
 父ハ時々他人カラ誤解ヲ受ケタト思ハレマス。ガサウイウ時
 デモ、父ハ絶対コビヘツライマセンデシタ。コウイウマジメナ

純ナ心ヲ持ツテヨリマス、デスカラ今度モ戦犯ノ容疑ヲ受
ケタトハ、私ニハドウシテモ信ゼラレマセン。
以上申上げタ様ニ、父ハ非常ニ頑固デアリマスカラ、今度ノ
事件ニ當リマシテモ、色々とアナタ様方ノ感情ヲ害シタ
矣ガアリマシテモ、ソレハ父ノ本心デハアリマセン故ニ、ヨク
ヨク父ノ本来ノ性質ヲ、アナタ様方ノ豊富ナ経験ト
博愛心ニヨリマシテ、察シテ下サツテ、ナニトゾ寛大ナル
御處置ヲイタダケレバ、私ノ幸福ハコレニスゲルモノアリ
マセン。

[Redacted]

[Redacted]

Exhibit 25

0331

Affidavit

Oath: I accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

February 27, 1949.

/s/ INOUE, Norio. (seal)

Affiant: INOUE, Norio, (seal)
1057 Horiuchi, Hayama-machi,
Miura-gun, Kanagawa-ken.

Having been duly sworn in accordance with the procedure followed in my country, I do hereby depose and say as follows:

I am the fifth son of INOUE, Sadae. I was very much loved under the care of my father and at the same time I was taught to be strong and righteous. My father is the man whom I most love and admire. When I heard that he was put in Sugamo Prison; was transferred to Guam, and was to be tried, I felt as if my heart were torn.

Although my father sent me to study at the Hosei University to receive education for the people and for the peace of the world, the present economical condition of my family does not allow me to go to the university. So I am now working at the Economical Department, G.H.Q.

At the office I am being taught statistics of America by Americans. I am deeply impressed by the tolerance and love of humanity of American people with whom I get along everyday. I am also surprised to know through these Americans the excellence of America in every respect, and feel that the Japanese people must study America much more.

When my father gave us instructions, he used to say, "Be kind to others." He told us that he should not curse others when they did evil against us and that we should do what we believed to be right.

I have been living with my father for many years and I believe I can state about his character. He was so sympathetic and affectionate to others that our home was always full of visitors. He loved animals and used to keep dogs and birds. I once saw him crying when his dog died. He was such a tender-hearted person, but on the other hand so righteous that he was sometimes considered to be stubborn and unadaptable. Because of such character, he was often misunderstood by others, but even on such occasions he never flattered. His mind was so sincere and pure that I can hardly believe that he is suspected as a war criminal.

As I have mentioned, my father looks rather stubborn. During the investigation of his case, I am afraid he might be disturbing. But his outward appearance does not show what he thinks in his heart. With your experience and kindness, please understand the character of my father and deal with him leniently.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

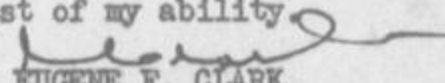

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 25 (a)

0332

Exhibit 26

0333

オイラ道中絵を美しく彩色し
室長と美事をもとて画しと水す
或は弟等が台所にてイタリと
お茶を寫せしと云ふ文筆に親
文化方面の趣味が深うある
一、ほろりと相ほろりとある
父母の死に際して遠くはるかに
相合ふこともある大の男が
て慟哭ししと云ふ妹の病死の
側者が兄の心情を察するも
するに林でと云ふこと
一、復員後は田舎に引うつり
仕事に専念し父母の墓に

日と違ひ——入謹愼う日と送るおまへ
孝の傳へ弟妹と愛——心やさしく
且つ戻もろい——私にも異村大思ふ
位で此う見が人命——と助ける——し
害とよへ——到底思ひも及ばぬを
てふさいきす——

千九百四十八年

八月二十五日

山本 須衛

Exhibit 26

0335

Testimony to the Personality of INOUE, Sadae

1. INOUE, Sadae is my sole elder brother. He has been full of kindness and filial piety since he was a boy. When he was a first-year pupil of a junior high school, he went on a school excursion with his classmates. As soon as he came back to his school after a few days' excursion, he came to our elementary school which stood quite near to his high school. And he asked me earnestly if our parents were hale and sound. I cannot forget this episode of his which clearly shows his personality.

2. When he was a boy, he was very good at painting a picture. I myself was fond of pictures, especially pictures representing beautiful women. He used to sketch his younger brothers at play in the kitchen or elsewhere. In a word, as a boy, he had a deep inclination to literary and artistic taste.

3. Since he entered the Japanese military academy, we lived apart and had scarcely any chance of meeting him. When our father and mother died, he burst into tears. When my younger sister died, he likewise burst into tears, and we could not help sharing his sadness.

4. After he was demobilized, he at last could return to his native place and he became a peaceful farmer. Here he often went to the graves of his parents and the deceased sister to pray. Considering his filial piety, his devotion to his brothers and sisters, and his intense sense of humanity, I cannot conceive that he acted, or connived with his subordinates to commit atrocities on the helpless prisoners of war during the war.

August 25, 1948

/s/ YAMAMOTO, Sue.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

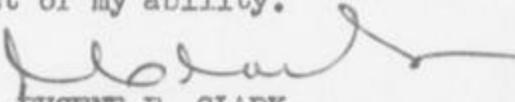

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 26 (a)

0336

人格証明書

「私、井上貞衛ト、親戚関係ノ者デアリマス
「井上貞衛ノ家庭、人トシテ、實ニ典型的ナキ夫ナリ
母父アルト、實ニ深く感テ居リマス 又目下者
對シテ、思ヒヤリ深クサシク 姪ニアル私、幼
時分カラ可愛ガラシテ叔父様ノト慕ヒテ
喜ビテ來ラシタ。

注意深く、誠実ナ性質ヲ叔父様ノ云ハル事、
アガヒ無イト尊敬シ信用シテキリシタ
若イ時ニクハベテ年寄ニシテ程マシ
円満ナ性格ニナラシタ
以上私ノ生活方面カラ見テ井上貞衛ノ性格デス

昭和廿三年 月 廿六日

大坂府豊能郡箕面町瀬川荘園五九三、六

青木 吉栄 謹

00

00

Exhibit 27

0338

August 26, 1949

/s/ AOKI, Yoshie, (seal)
592-6 Segawa Shoen, Minomo-sho,
Toyono-gun, Osaka-fu.

Testimony to the Personality of INOUE, Sadae

1. Relationship.

I am a relative of INOUE, Sadae.

2. His personality.

As a family member, he was an ideal husband and was a good father. He was exceedingly kind and sympathetic towards inferiors and minors. I, a niece, was dearly cherished by him, and I always loved him.

He was attentive and sincere; what he advised me was always true. It was quite natural that I respected him. The older he grew, the more amiable and harmonious he became.

The above is the outline of his character, seen from the viewpoint of a relative of his.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.



EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 27 (a)

0339

井上貞衛人格證明書

一 井上貞衛は私共の兄弟であります

一 井上貞衛は少年時代から純情の持ち主
でありました。父と母とに比べては存養を
受けるべく厚徳を敬し深く弟妹を愛
しそのために身を尽くすことを忘れず利欲的な行
動はすべからずありまゝとした責任感の強い
愛情の豊かなて現利的で狡猾な行爲を
極端に憎む性格であることを見事に
證明したにと存じます

山内家

昭和廿三年八月

岡本 萬衛 (印)

平尾 通雄 (印)

00

0

0

Exhibit 28

0341

TESTIMONY TO THE PERSONALITY OF INOUE, Sadae.

1. INOUE, Sadae is our brother.

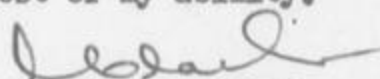
2. From boyhood, he has been sincere. He has been very dutiful to his parents. He respected his elder sister and loved his younger brothers and sisters. He hated selfish or cruel acts, and had strong sense of responsibility.

August 1948

/s/ OKAMOTO, Atsue. (seal)

/s/ HIRAO, Michio. (seal)

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.


EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

供 出 者

神奈川県三浦郡葉山町堀内一〇五七

井 上 真一



私儀、我國に於て行なれる法式に従ひ先づ別紙の如く宣誓したるを以て
の如く供進致します

昭和二十四年 二月 二十七日

宣 誓 書

良心に従ひ何等をも欺秘することなく又何等をも附加せず眞實を述べ
ることを誓ふ。

昭和二十四年 二月二十七日

宣誓者

神奈川県三浦郡葉山町堀内一〇五七

井上 真一

供述書

神奈川県三浦郡葉山町堀内一〇五七

井上 眞 

私ハ井上貞衛ノ長男トシテ生レ兩親ノ下デ日々愛情ニ満タ
タ指導ノ下ニ生長シ父ガ私ノ人格完成ノ目的ヲモツテ中学校
大正校ノ教育ヲ習得セシメ現在商業人トシテ社會ノ一助
タラント勵イテ居ル者デ有リマス。

私ノ父井上貞衛ハ家庭ノ父トシテ我々子供達ニハシツケハ
ヤカマシイガ眞實ノ慈愛ノ有ルヤサシイ本當ニ良イ父デ
有リマス 私達子供ハ幼少ノ時カラ常ニ人向トシテ正シイ
道ヲ進ムコト・博愛心ヲ充分ニ養フ何時モ人ノタメ社會
ノタメニツクスベキヲ父ニ教育サレマシタ。其シテ亦私達子供ガ
病氣ヲスレバ父ハ常ニ母ト共ニ寢食ヲ忘レテ看護ヲシテ
下サル優シイ父デ有リ又私達子供ガ間違ツテ他々ニメイワリ
ヲカケル振ナ事ガ有レバ父ハ私達子供ノ非ヲ叱リ注意ヲ

スル父デ有リマシタ此ノ様ニ他々ニハ悪ルイ事ヲシナイ様ニ
教ヘル父デ有リマス

軍々トシテノ父ハ私ノ知ツテ居ル限リ席ニ多クノ兵士ニ公正ニ
下級ノ部下ヲ愛シ秩序ノ正シサヲ保持スル事ヲ何時モ
強調シ多クノ部下ノ人達カラ親父々々ト親愛ナル表現デ
親シミ愛サレタ立派ナ軍々デ有ツタ事ヲ度々周囲ノ人ヨリ
聞イテヨク知ツテ居リマス

今此ノ様ナ和達ガ最モ愛シ敬フ父ガ終戦後戦犯容疑者
トシテカワム島ノ軍事裁判ニ裁カレル事ニナリマシタ不幸ヲ
思ヘバ日夜私達家族ノ者ノ心ハカワム島ノ父ニ飛ビ悲シサニ
心ハ乱レ此ノ不運ヲナゲク私達ノ胸ハ破レンバカリノ悲シミデ
イツバイデス

上述ベマシタ様ニ何時モ正シク優シカッタ私ノ父ニモシ過ツテ
何カノ過失ガ有リトスレバ之ハ決シテ父ノ本心デハナクモシ
私ノ父ニ過ケノ罪アリトモスルナラバ何カ父ヲシテ過失ヲ
サセタカラ充分所調査ノ上アメリカノ裁判官ノ皆様方ニ

no. 3

何卒終戦國境ヲ越ヘテ眞ノ人類愛ノ所理解ノ下ニドウカ
所情有ル所廣大ナル裁判ヲシテ頂ク事ヲ伏シテ所願ヒスル
次オデ有リマス此所ニ父ノ人格ノ一部ヲ述ベテ私ノ
供述書ト致シマス。

一九四九年二月二七日

AFFIDAVIT

Oath: In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

February 27, 1949.

/s/ INOUE, Shinichi. (seal)

Affiant: INOUE, Shinichi,
1057 Horiuchi, Hayama-machi,
Miura-gun, Kanagawa-ken.

Having been duly sworn in accordance with the procedure followed in my country, I do hereby depose and say as follows:

I was born the eldest son of INOUE, Sadae, and was brought up under the affection of my parents. My father afforded me studies at a high school and a university for the perfection of my self. I am now working for society as a business man.

My father, INOUE, Sadae, was very strict about our manners and behavior, but at the same time he was very affectionate toward us. Indeed, he was a good father. We, his sons, were taught by him from childhood that we should always be righteous, and that we should work hard for the people and for society. He was a tender father. When we were sick he attended our bedside taking care of us, forgetful even of food and sleep. He instructed us not to do wrong toward others. When we caused trouble to others by accident, he admonished us to be more careful.

As far as I know, my father, as a military officer, treated his men with righteousness, loved his lower ranking subordinates, and strived always to maintain order. He was liked and loved by many of his subordinates who used to call him "Dad" with close intimacy. I know from the talk of the people around my father that he was a fine military officer.

My father was such a man that we loved and respected him most. However, after the end of the war, he is to be tried as a war criminal suspect by the military commission on Guam. When I think of his misfortune, I feel as if my mind were flying away from me toward the island of Guam. With this tormenting sadness, we grieve his ill-fate and I feel as if my heart were torn.

As I have stated, he has always been just and tender. If there is a fault on my father's part, he could not have intended to commit it. If he committed a crime, please fully investigate what made him commit such a crime. Judges of the American court, I beg you will afford a lenient trial for my father with your true love of humanity even toward us Japanese who are across your border. Having stated a part of my father's character, I humbly submit this affidavit to your kind consideration.

February 27, 1949

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

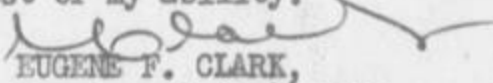

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 29 (a)

0348

人格証言書

井上氏と相識するに至った経緯

(一) 昭和六年七月香川縣丸亀市にて相識に至った其後氏が立部
事変の爲出征したので音信不通吏交中絶するに至った

(二) 関係友人
人格証言

(一) 誠實にして交情に富み頗る親切なる人柄である。小生が丸
亀にて初めて相識の様になつたのは單に同郷者としての事
で實は此迄は相識の間柄ではなかつたが小生が卓身丸亀
に赴任した事も耳にした井上氏は小生が土地不案内の所に赴任し
て家事万端困るであらうと思ひ到着當日小生の宿所を訪ね
旧知の様な親切心を以て公私万端に亘り親身も及ばぬ世話を
なし特に地方の人情風習在郷軍人の動向等小生の聯隊區司
令官として執務上知るを要する事柄を細大漏さず注意し呉
れ其後事ある毎に小生の偕居も訪ね懇切なる指導を呉る此其
外家事上の此事に至る迄何れもなく世話し呉れた親切は小生の終

生忘る事の出来な氏に對する印象である

(二) 博愛心に富み部下を愛する事自家の子女の如くであつた。氏が
撫瀾高等工業學校の配属將校であつた時學校の學生が氏を敬慕し
氏の家庭には日々數名の學生が來仰し氏の教を乞ひ又男子生中の家計
困難なる者にはして學費貸しを得る事能はざる者は氏に自らの工賃餘科中よ
り幾分を割き是等の學生を救ひ其成業を樂あり是れ爲學生の卒業後
にも常に氏の教を請ひ其指導を受け居たり氏が滿洲に転勤するや學
生中氏を慕ふ饒り遠く滿洲に氏を訪ねたる學生多數ありと聞ひ又氏は
の人格をトクに足る

(三) 高潔で尤も優れた人格者であつた事は尤も事實で最もよく知る事が
來る
由來日本陸軍で中將級以上の位置に昇進する事のある者は陸軍大
學校出身將校中の逸物が大部分で非陸大出身將校は將に人格の優れた
人物で一般の人の望みある人でないと然んと中將級には昇進が來る
つた然るに井上氏は非陸大出身者であつて能く中將迄果進し然る
南方軍の獨立部隊長として活躍せるは一に氏の優れた人格の賜
であつて日本陸軍中央部に於ても氏の徳望のあつた事を証する事ある

昭和二十三年九月七日

高知縣香美郡野市町東野一七四三番地

香宗我部

香

Exhibit 30

0350

Testimony to the Personality of INOUE, Sadae

1. How I became acquainted with him.

(1) I became acquainted with him at the City of Marukame in Kagawa Prefecture in July, 1931.

(2) Relationship: one of his friends.

2. His personality.

(1) He is sincere, friendly and kind. Both he and I were born in the same prefecture, but I did not know him till July, 1931. When he heard that I had arrived in the city without accompanying my family, he hastened to me. At that time I did not know the circumstances of the city very well. Yet I had been appointed to be the chief of the Marukame Mobilization Center. Calling on me on the very day when I arrived in the city, he explained everything which might be of some service in carrying out my new work. Afterwards he used to call on me and helped me not only in official duties but also in household matters. I shall never forget his kindness.

(2) He was exceedingly kind and obliging towards his subordinates. When he was an officer of military training attached to the Yokohama Higher School, he won the love and respect from all the students of the institute. Almost every day several students came to his house for advice. His salary was rather scanty, but he often gave monetary assistance to the poorer students. It goes without saying those students were full of gratitude, and some of them went to thank him, even after he was transferred to Manchuria.

(3) The following, I believe, clearly testifies his ability and personality. In the actualities of the former Japanese army, it was next to impossible for an officer to be promoted to the rank of a lieutenant general unless he was a graduate from the Military College. Therefore, the fact he was promoted to the rank of a lieutenant general shows that both his ability and personality were fully recognized by the central staff of Army Ministry of the Japanese Government.

September 7, 1948

/s/ KOSOKABA, Moto, (seal)
1742 Azumano, Noichi-machi,
Kami-gun, Kochi-ken.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

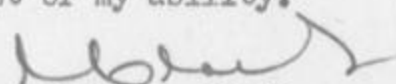

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 30 (a)

0351

元陸軍中將井上貞衛、人格證言

一 井上貞衛と知る期間及経緯

一九四三年十月から一九四六年三月迄第十四師團長として私の上官であつた

二 人格證言

一 師團長井上貞衛は本質と表現とに於て甚だしく差異あり表面常に冷厳峻烈を御美反面温情溢る所と有し作戰中は勿論米軍に降伏後部下、重労働に際しては親の子に對する心情を以て接し剛直に仕へた私と幾度か有難夜、嬉し夜、其、其、所々心中を察した次第であります

二 冷厳峻烈の余り部下は稍々ともすれば本質を把握出来ず頓迷と云ふ誤解したことがあつた

三 上司の命令訓示等は真正直に之を受けて行使し自己に不利なる採る場合にも之を他に転嫁する採ることはなかつた又命令権は師團長のみ存するものがあると言ふことも非常に強調せられた

四 入院患者の見舞は毎週月一回は行へ榮養失調等により部下が死亡すると其都度非常に気の毒に思はれ留守宅に對して申譯をいと度々、に申されるのが常であつた

五 一九四五年九月バラオに於て米軍に降伏後の中將の行動に關してバラオ諸島米軍總司令官より別紙寫、如き賞詞を受けた

一九四六年七月二十九日

元策十師團高級副官 陸軍少佐

川 又 宗 (58)

Exhibit 31

0354

TESTIMONIAL AS TO THE CHARACTER OF
EX-LIEUT-GEN. INOUE, Sadae

I. Period of time and circumstances that brought me in contact with
INOUE, Sadae.

From December 1943 till March 1946, he was my superior officer, occupying the post of the 14th Divisional Commander.

II. Testimonial as to his character.

a. There was a marked difference between the outward appearance and what was really in the heart of the divisional commander INOUE, Sadae - always dispassionate, severe and strict in appearance, yet full of warm feeling at heart. Not only during the military operations but after the surrender to the Americans, he had the affection of a father to his children when his subordinates were engaged in hard labor, and I, who was always close to him and often heard him talk of them with concern, sympathized with him, and could not but several times be choked with tears of happiness and gratitude.

b. The general, having been too dispassionate, severe and strict, his subordinates sometimes failed to understand what was really at the bottom of his heart and mistook him for a bigot.

c. He did faithfully accept and put into practice all the orders, instructions, etc., from those authorities above him; he never shifted responsibilities upon another's shoulders even when circumstances turned disadvantageous to him. He laid special emphasis on the point that the divisional commander alone is vested with the right of giving orders.

d. At least once a month he visited the in-patients. Whenever his subordinates died of malnutrition or such like diseases, he was very sorry for them, and used to say with tears in his eyes that he had no excuse to make for it to those families at home.

e. He was praised by the Commander-in-Chief of the American Army in Palau Islands for his good conduct after the surrender to the Americans at Palau in September 1945.

July 29, 1948

/s/ KAWAMATA, Soichi,
Former Major, IJA.,
Adjutant General to the
14th Division.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

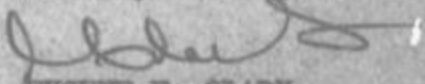

EUGENE F. CLARK,
Lieutenant (junior grade),
U. S. Navy,
Interpreter.

Exhibit 31 (a)

0355

人格証明書

一 井上真衛氏と私は昭和拾二年八月
より拾四年四月迄隊長と部下の関
係にあつた

一 井上真衛氏は軍人として極めて嚴格に
反面部下並に担任地區住民に
對し温情味のある人格の持主で
人々何はる地位関係にある人々
も自分地位身分を忘れ真面目に
救つてくれる人であつた
住民も非常に懐き其の担任地區は最も
悪の治安地區であつた
拳銃も決し敵味方と問はず一度無能と
なれる者に対し非道を行へる人
は事と証明します

昭和三年八月三日

東京都東區金町三丁目五番

安

本

名

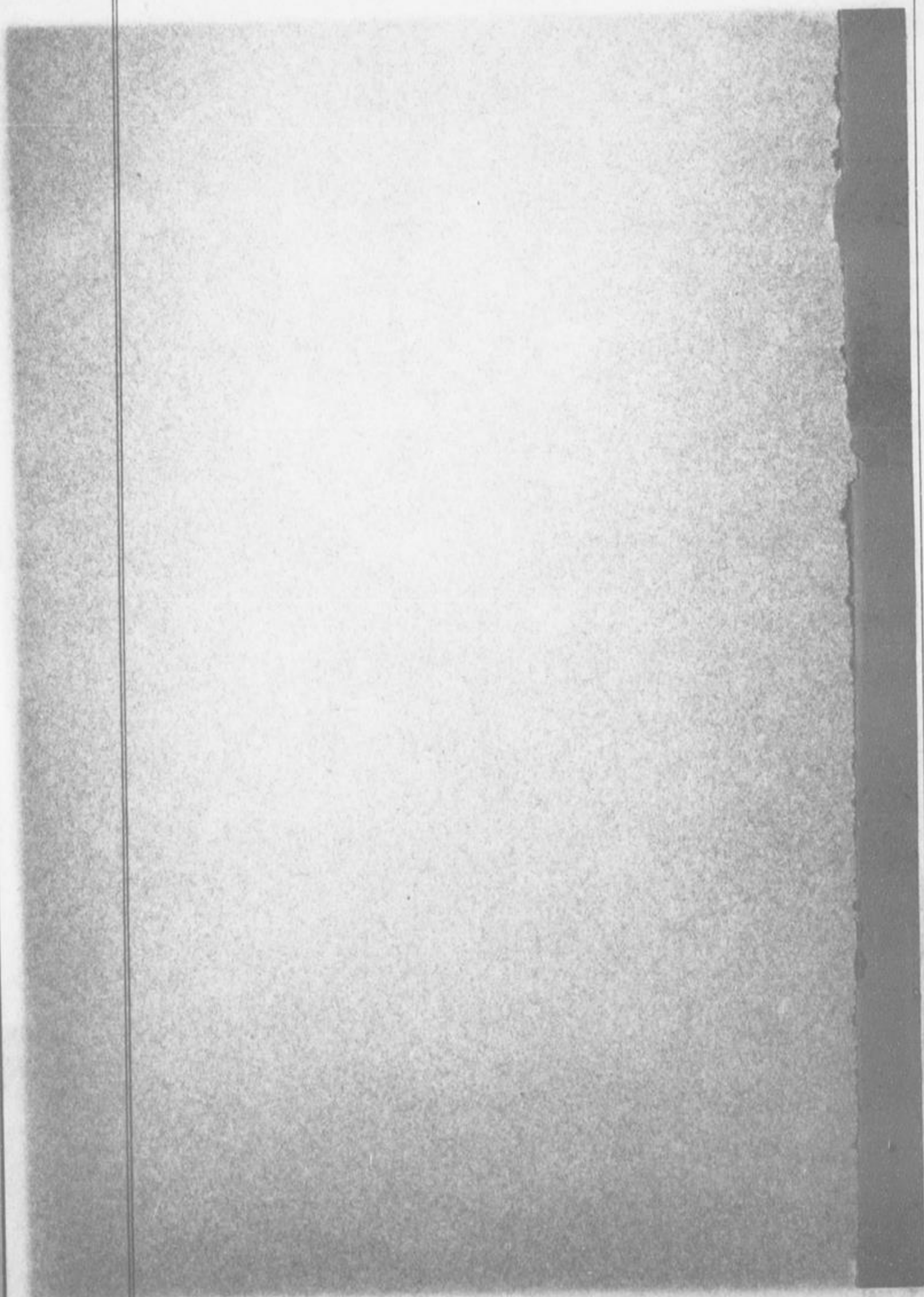


Exhibit 32

0357

August 28, 1948

/s/ YASUMOTO, Hisashi, (seal)
c/o NAMATAME, Hikaru,
20 Shimizu-machi, Yanaka,
Daito-ku, Tokyo.

Testimony to the Personality of INOUE, Sadae.

1. Relationship. He was our commander from August, 1936 to April, 1939.
2. His personality. He was strict and impartial as a soldier. As a man, however, he was humane and full of benevolence. He was benevolent not only towards his subordinates, but also towards the natives in the area for which he was responsible. He helped those who were in need, forgetting his high rank in the army. Consequently both his subordinates and the natives at large liked him very much. Indeed, he changed the area which was notorious as the worst one, into the area of highest reputation. I affirm herewith that he is not such a sort of person who is disgraceful enough to torture those helpless persons, whether they may be friends or foes.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

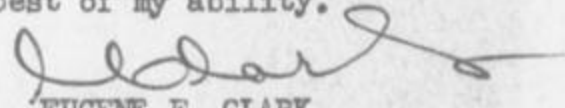

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 32 (a)

0358

小野瀬 一郎

以下私は良心に則り眞實を述べる事を誓ひます。

1. 私は昭和十八年十一月井上貞衛中將が第十四師團長としてチハルに着任以来全中將を知つてゐます。當時私は第十四師團隸下の野砲隊に勤務して居りましたが間もなく第十四師團司令部附となり。爾來昭和二十年十二月私がパウオを出發して内地に歸る迄井上中將の司令部で勤務したので彼の人格及評判については良く知つてゐます。
2. 井上中將はこと公務に関しては非常に嚴格ではありましたが公務以外に於ては非常に優しい思ひやりの深い一面がありました。

。戦争の末期に近づくに従つてパウオは饑餓状況を呈し、餓死するものが續出する惨狀を現出しました。

Exhibit 33(1)

○ ○ ○ ○
當時最高司令官たる井上中將は只一人の従者を
伴ひ密かに兵隊の給食状態を視察し、其の餘り
にも劣悪な給養に驚かれ、自らも美食を廢し兵
隊の給養改善に最大の努力を盡す様各部隊
に指令を出しました。

○司令官井上中將は私達若い將校が書類の檢
閲或は報告等に参加すると隷下部隊から司令官
に贈られた果實を或時は二、三本の煙草を下さ
れ、私達を慰め激勵されるのが常でした。

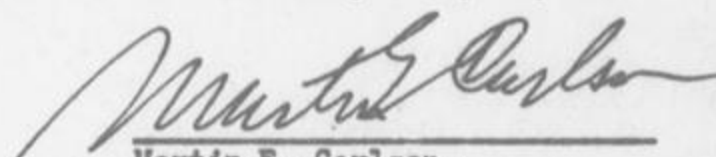
因みに當時は煙草は私達に全然配給無く入
午難の時でした。

○井上中將は最初は非常に恐ろしい、厳格な人の
様に感じられたのですが時が経つにつれて其の人
情味も感ぜられまして戦場に於ては殊に其の

偉大さが日を経るにつれて大きく感ぜられる様な人
でした。 終り

昭和二十四年四月二十六日

Subscribed and sworn to before me this 26th day of April, 1949.


Martin E. Carlson,
Commander, USNR,
Defense Counsel.

WITNESSED:

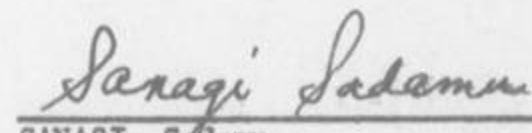


SANAGI, Sadamu,
Defense Counsel.

Exhibit 33(3)

0361

PETITION.

I, ONOSE, Ichiro do hereby swear to tell the truth according to my conscience.

1. I have known Lieutenant General INOUE since November 11, 1943 when he assumed command of the Fourteenth Division then at CHICHINAR. At that time I was serving in a Field Artillery Unit which was subordinate to the Commanding General of the Fourteenth Division, and I later became attached to the Headquarters of the Fourteenth Division. From that time and until December 1945 when we left Palau and returned to Japan, I served with Lieutenant General INOUE's Headquarters, and I know his character and general reputation very well.

2. General INOUE was a very strict person in regard to official duties but aside from this he was kind and sympathetic. As we approached the last stage of the war, a state of starvation prevailed over Palau and presented a pitiable situation where many died.

Lieutenant General INOUE, at that time the Senior Commanding Officer accompanied by his orderly secretly inspected the food rationing of the soldiers, and was amazed at the deteriorated condition of the rations. He then himself abstained from good food and issued directions to all units to exert themselves in improving the rations of the soldiers.

Whenever we young officers went to Lieutenant General INOUE to report or for the inspection of documents, he would as a sign of encouragement and in recognition of our work give us cigarettes and fruit presented to him by his subordinate units. At that time not a single cigarette was rationed out to us, and they were very hard to obtain.

The first impression I received of Lieutenant General INOUE was that of a fearful and stringent person. As time went by we began to appreciate his tender feeling for other persons. In the battlefield we could not help but admire and respect him for his great character.

April 26, 1949

ONOSE, Ichiro.

Subscribed and sworn to before me this 26th day of April, 1949.

/s/ Martin E. Carlson
Martin E. Carlson,
Commander, USNR,
Defense Counsel.

WITNESSED:

/s/ Sanagi, Sadamu

SANAGI, Sadamu,
Defense Counsel.

I hereby certify that the above is a true and correct translation from the Japanese original to the best of my ability.

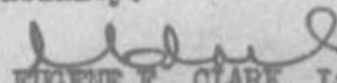

EUGENE F. CLARK, Lt.(jg), USN,
Interpreter.

Exhibit 33(a)

0362

元陸軍中將井上貞衛の人格証言

(一) 私は良心に従ひ以下陳べる証言は眞實であることを
誓ひます

(二) 私が井上貞衛を識った期間及び経緯

井上中將が 1943年12月から 1946年
3月迄第十四師團長であつた期間私は彼
の部下の第十四師團參謀として作戰教育
編成等の業務に服しておりました

(三) 人格証言

(A) 彼は責任觀念の強い人でありました

(a) 日本國民が戦争に疲れ軍が末期的
症狀に陥つて行くとき國を想ひ軍を想
ひ 陸軍大臣の訓令を眞面目に守つて
古武士的嚴格な統率により常に

部下を激励しその職責も十分に盡した
(b) 部下から出した計画を決裁した以上はその責任は彼自身が執り 部下の失敗もその責任を執る人でありました

(B) 彼は感情にもろい人でありました

(a) 部下思ひで表面厳格を装っていますが腹の中は人情たっぴりな人で部下の戦死を聞いたり 病院に部下を見舞ったりしたときは直ぐに涙を流していました

(b) 1946年3月7日 復員局長香月中将にパラオ戦の状況報告を行つたとき井上中將は多くの部下を失つて申訳けがありませんとて声をあげて

泣き報告もろくろく出来なかった人
であります

(C) 兵士も可愛いがった人であります

(a) 部隊を視察するとき必ず兵の状況
特に衛生・給養状況に注意し
強く中、小隊長にその指導監督
を促がして義勇兵を大切にしてい
ました。

(b) 終戦に近づき現地自語が思うよ
うにならず栄養失調で死亡者続出
のとき特に心配して自ら一人の伝
令をつれて各部隊を微行して
状況を見廻っていました
又患者食が少量で悪いとの情報

を聞き特に不意打的に参謀を病
院に派遣してその實情を調べさせ
直ちに之れを改善させました

Subscribed and sworn to before me this 26th day of April, 1949.

Martin E. Carlson

Martin E. Carlson,
Commander, USNR,
Defense Counsel.

WITNESSED:

Sadamu Sanagi

Sadamu Sanagi

SANAGI, Sadamu,
Defense Counsel.

1949年4月26日

元第十四師團参謀陸軍大佐
現神奈川県民生部世話課長

中川 廉

Kiyoshi Nakagawa

Exhibit 34(4)

0366

PETITION.

CHARACTER EVIDENCE FOR INOUE, SADAЕ, FORMER LIEUTENANT GENERAL, IJA.

1. I hereby swear that the following testimony is the truth according to my conscience.
2. The period in and circumstances by which I came to know INOUE, Sadae.
During the time Lieutenant General INOUE was Commanding General of the Fourteenth Division from December 1943 to March 1946, I served under him as one of the staff officers of the Fourteenth Division in charge of operations, education and organization.
3. Character evidence.
 - A. He was a person with a grave sense of responsibility.
 - a. When the Japanese people became weary of the war, when the militarists were showing the last symptoms of a dying man, he, INOUE was the only person who was still keeping his subordinates under control with the strictness of a battle-worn warrior encouraging his men to fight on, and faithfully abiding by the instructions of the War Minister, having the interest of the nation at heart, and thereby accomplishing his task as Commanding General.
 - b. After he approved the plans proposed by his subordinates he assumed full responsibility for them, even when a failure was due to his subordinate's mistake.
 - B. He surrendered to emotion very easily.
 - a. He was devoted to his subordinates. Ostensibly, he feigned strictness yet in his heart he was overflowing with deep affection for others. Whenever he heard of the death of a subordinate, he was seen to shed tears.
 - b. When INOUE made his report on the battle around Palau to Lieutenant General KAGETSU, then Chief of Demobilization Bureau, on March 7, 1946, he was so filled with deep mortification over the loss of his subordinates that he cried profusely and could hardly give a coherent report.
 - C. He took affectionate care of his men.
 - a. In his inspection tours he always took note of the health, and food rations of the soldiers, and strongly stressed the leadership and control of the Commanding Officers of companies and platoons in this respect, treating the enlisted men exceedingly well.
 - b. During the closing stages of the war, it was becoming increasingly difficult to maintain food supplies at the front and those who died of mal-nutrition mounted at an increasing rate. He was specially apprehensive of this situation and would secretly make tours to various units accompanied by only one orderly.
 - c. Once he heard about the insufficient and unsatisfactory quality of the food given to patients. He immediately dispatched a staff officer to investigate the actual conditions and remedied the situation at once.

April 25, 1949.

NAKAGAWA, Kiyoshi.
Former Colonel, IJA.,
Staff Officer of 14th Division

Now, Chief of Civilian Relief
agency, Kanagawa Prefecture.

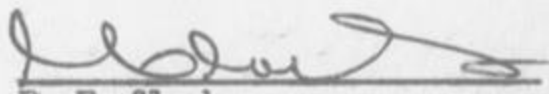
Subscribed and sworn to before me this 26th day of April, 1949.

Martin E. Carlson,
Commander, USNR.
Defense Counsel.

WITNESSED:

SANAGI, Sadamu,
Defense Counsel.

I hereby certify that the above is a true and correct translation
from the Japanese original to the best of my ability.



E. F. Clark
Lieutenant (jg), USN.
Interpreter.

人格證明書

一、私は井上貞衛の二期前の者です陸士卒業以来今日に至る迄の親友です大正七年から大正十五年迄普通寺師團員令却で机をめぐって勤務しました

一、井上貞衛は性温厚人に交るに懇切人格最も高潔上官の信頼厚く友人部下皆井上を敬慕してゐました

昭和十三年八月十日

香川県綾歌郡坂本村

中井重義

Certification of Personal Character

10 August 1948

Name: INOUE, Sadae.

1. I graduated from the Military Academy one year earlier than Mr. INOUE, Sadae. He is one of my intimate friends since he graduated from the above mentioned school. From 1918 to 1926 we served together at the Zentsuji Divisional Headquarters.

2. Mr. INOUE, Sadae is gentle and kind hearted toward others and a man of noble character; he was highly trusted by his superiors and was loved and esteemed by all his friends and subordinates.

/s/ NAKAI, Shigeyoshi.

Sakamoto-mura, Ayauta-gun,
Kagawa-ken.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

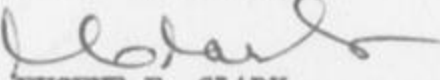

EUGENE F. CLARK,
Lieutenant (junior grade),
U. S. Navy,
Interpreter.

Exhibit 35 (a)

0370

元中將井上貞衛 聞

証言書

元中將井上氏が大尉時代在荷知生安常西軍隊第十中隊長として勤務中証言者たる石本は其の部下として同中隊・勤務に公私と身・日夜親交したる者なるが當時井上氏の實業家たる人格に敬服したるは他、余のみならず今中隊の将兵一同有之、敬慕し、隊中神に見る慈愛深、種々乾中隊長より、其慈愛心の強烈あるは身・強固の外無く敬・訓練は元より日常の先言後語と云ふ部下と息ふの至情に出でざるは無く、爲めに今中隊を率いて常、慈父の如く敬・慕ひ、尚、降兵・難一身上の不安・不満等ある者無し、中隊長・如何なる些事と云ふは自ら明け訓へを受けざる者無く其の上下の親しきは血縁に勝り見る者をして感激措く能わざらしむ。萬一部下に過失ある時は中隊幹部全員一致して思教四計主義を以て處断せらるる事、力能るる容易に許さず常、温情を以て強調して一歩も譲らざる遂に激論となり爲めに幹部と感感情の衝突も未だ遂に意志の疎隔もあらず事二三にして止まらざりき、此生軍隊に勤務する事二十五年の長時日に亘ると云ふ未だ嘗て井上氏の如き慈愛心の強き者を見たる事ナシ、以上の如き井上氏の人格・性行より推察するに如何に戦時・惨烈・極感感情の平靜と久く事ありと云ふ國際法も無視し良民就中神に奉仕する空教師の殺害と部下に許さず如何に到底夢想せざるに及ぶ得ざるは常と云ふ一人のみならず萬人の知る所なる可し。

右証言者

昭和二十三年八月十日

証言者 元中將

石本 貞直

石本 貞直

Exhibit 36

0372

Testimony to the Personality of INOUE, Sadae,
Former Lieutenant General.

When INOUE, Sadae was an army captain and was serving as the commander of the 10th Company of the 44th Infantry Regiment stationed at Kochi City, I was one of his subordinates in the company. At that time I observed his personality day and night. I respected him from the bottom of my heart. He was liked and respected both by his colleagues and his inferiors. He won the reputation of being an ideal company commander. His merciful spirit and obliging attitude towards his subordinates were truly wonderful. His deep love towards his subordinates expressed itself not only in education and discipline but also in his every word. Therefore he was looked up to as if he were a benevolent father by the personnel of the entire company. Some subordinates who had personal troubles to be solved or who had complaints to make were quite willing to speak to him frankly for the purpose of getting his advice. In this respect, there was no class-distinction between him and his subordinates. Even when the company staff, consisting of officers and non-commissioned officers, wanted to punish a private soldier for misbehavior, he used to object to taking such a harsh step. In such a case, a hot dispute sometimes followed between him and his staff. He was, however, firm and always wanted to make a misbehaved private repent through educational means. Throughout 30 years' military career, I have never seen such a merciful officer as he.

Now, I hear that INOUE may be indicted as a war criminal for ordering his subordinates to kill a foreign missionary. I absolutely believe that he did not order such a cruel thing, judging from his personality which I know perfectly well. It is true that war is cruel, and during a war a fighting man is apt to lose the equilibrium of his heart; still INOUE is the last man to be cruel to an unarmed person, especially to a missionary whose holy work is to serve God and mankind.

August 11, 1948

/s/ Former Lieutenant General
ISHIMOTO, Sadanao, (seal)
1107 Kamobeshita, Kochi-shi.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

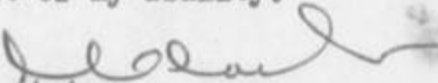

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 36 (a)

0373

人格證明書

- 一 私と井上貞衛とは大正六年より昭和二十一年迄三
年間先澤後澤年々下級者の関係におき、
- 二 井上貞衛は人格高潔で特に部下や後輩に對し
人情味の豊かさを殊に示した人である
- 三 私は大正六年から十二年頃まで同じ部隊に勤務して
居ましたが、尤もには上面からは人事との交渉も
田満で特に部下に對しては母親も及ぬほどの愛情を
注ぎ、私に對する希望は常に高くあつた
- 四 私は昭和十四年八月五日頃井上貞衛と同じ場所の
勤務に居たが、既に地附近の民衆に特に親切で
同情心が深く女子供まで井上貞衛に慕はれた
- 五 戦後井上貞衛の自宅を訪問した際も著しく
その温情味と、私を思へば大體中事故なく
任務を遂行して居た戦後進駐軍司令部との
円満な交渉に、心から感服した
- 六 私等は井上貞衛が遂に取調へられた事を知り
意外に思つたが、
井上貞衛に限らず、同連隊の行方不明者は何人も
先づ必ず無罪に歸るとする事を信じて居る

昭和二十三年八月十八日

香川県仲多度郡善通寺町五丁目番地

西本英夫

00

●

●

Exhibit 37

0375

Certification of Personal Character

18 August 1948

Name: INOUE Sadae

1. Mr. INOUE, Sadae and I had the relationship of senior and junior or superior and subordinate for 30 years from 1917 to 1946.
2. Mr. INOUE, Sadae was a man of high character and he was a righteous man, especially generous, full of human nature toward his subordinates and juniors.
3. I served with him at the same troop from 1917 to about 1923 and he served his superiors faithfully, the intercourse between his friends was harmonious and especially he was filled with warm feelings toward his subordinates, which attitude even their kinsfolk could not have surpassed. Especially he always took sides with the weak.
4. I served with Mr. INOUE, Sadae at the same place from 1939 to about 1940, he was especially kind and had a deep sympathy to the people in the neighborhood of the place where our troops were stationed and even women and children there were friendly to him.
5. On the occasion when we called on him at his private house after the end of war, he welcomed us with the same warm feelings as before and we were very much pleased from our innermost hearts to hear that he carried out his duty without any mistake during his stay at Palau and that especially he had satisfactory negotiations with the Allied Commanding Officer after the end of the war.
6. We were surprised to hear that Mr. INOUE, Sadae is being examined overseas. I can not by any means believe that Mr. INOUE, Sadae has committed an illegal act. I firmly believe that he will be found innocent and returned home.

/s/ NISHIMOTO, Hideo,
No. 1574, Zentsuji-cho,
Nakatado-gun, Kagawa-ken.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

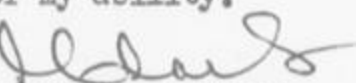

EUGENE F. CLARK,
Lieutenant (junior grade),
U. S. Navy,
Interpreter.

Exhibit 37 (a)

0376

人格證言書

一 井上貞衛氏相識に至る経緯

(一) 大正十二年九月秋歩兵第四十四聯隊

第三中隊長職に在りし時氏同聯隊第二中隊

長として看任せられた相識に至る次第氏

轉任後、迄親交あり任後、雅音信

續けて今日に至り相當長期間に亘り交際

氏の性格は承知あり

(二) 同氏の關係特別の關係は、単に陸軍

士官学校出身者としての交際のみならず同郷

出身者として同隊勤務に於て親交あり

二 人格證言

氏直情径行人にして常に偏幅を飾らず

者たる者として人々同様の裸一貫に應

接し殊更儀禮的に暑を忍寒を耐へ

自己意を枉げず美點あり且意

思を素直に表現する性格は寧ろ人好

威なり或る要する義に於て部を枉げ

強々性格有き一面血を涙ち人情味
篤々人々

昭和二十三年八月十七日

高知縣高知市西町九十八番地

細木

橘

0378

Exhibit 38

0379

August 17, 1948

/s/ HOSOKI, Tachibana, (seal)
98 Nishi-machi, Kochi-shi,
Kochi-ken.

Testimony to the Personality of INOUE, Sadae

1. How I became acquainted with him.

(1) In September, 1923, I was the commander of the 12th Company in the 44th Infantry Regiment, when he was appointed as the commander of the 1st Company in the same regiment. Consequently he and I became acquaintances. Even after he was transferred to another regiment, we exchanged correspondence.

(2) Not only being a graduate from the same school, namely the Military Academy, he is a native of the same prefecture where I was born and am living now - Kochi Prefecture.

2. His personality.

He spoke and behaved as he believed without reserve. He was sincere and hated to be showy and affected. He was liked by others the more, because he was outspoken. The sense of responsibility was much valued by him, but at the same time he was humane and sympathetic.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

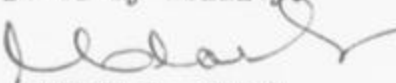

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 38 (a)

0380

不陸守將井上貞衛に關する人稀伝言書

一、貴人同藏此乃至正經律

[illegible]

二、性愛、

主は必ずしも諸の朴誠事をして「己」の爲めなく、祇
 に己の爲めなく、其の爲めなく、而して其の爲めなく
 二交信するに實に温順且つ恩恵深きあり、犧牲の精
 神を發揚せし實例

1. 中央の選挙権は在野中に同意書(他、他地方の選挙権
ありき)の下で選挙権は、私的制裁で他、他地方の選挙権
に受けとせられ、井上は選挙権の私的制裁と、一、選挙権と

りたに國番士女に及ぶれば 懲罰制がなされて國美
一般から敬慕せられる。

一、中隊長時代に稱して司令なり、兵卒に對する私的制裁嚴禁の注意ありしを侮辱部下某少尉が侮辱に犯し、偶々疎忽その辱なりやかきしくたりしに、井上は平常兵卒に對する暴行を犯せるを、嚴禁を戒め居ると、誠に遺憾なりと、かたがたに決するにあらざる疎忽に申出で曰く、あの兵(當時制裁せられし者)に對しては、鉄拳の制裁を犯せるよしと許しある、いふも非ざる虚偽の申出にて部下を救ひたり、井上は確かにその爲に行政処分せられ、是れ某少尉は感激泣く、爾後中隊長のため命令となりて真面目に働けり

三 威動漢官。陸井上中衛の某の公曹七が大信部
（命令書領に用いて字集金他実を誤り傳へ其は
不都合を發せし當時大信とは其の曹七に行政
如きものと大怒りし）が井上中衛とは其れは
中衛と感違ひし。其の公曹七は命令通り
付しと大信と申し部下の責任をぬける
なり。

右如く部下の爲めに責任の精神を發揮せし
之收養を蒙る者之來斯の如きなり
爲すに及ばず彼れは馬鹿けたるものと彼の
人格を能く知らざる輩事なり。是なり
右二、三の例を例示す

昭和三十三年八月十日

同親同期生

宮内省事務局 四九

大倉三四我

00

Exhibit 39

0383

August 18, 1948

/s/ OOKURA, Miyozo, (seal)
49 Kitashin-machi, Kochi-shi,
Japan.

Testimony to the Personality of INOUE, Sadae.

1. How I became acquainted with him.

He comes from the same province as mine. Moreover, he and I entered the Japanese military academy in the same year, namely, in 1904. After graduation from the academy, also in the same year, both he and I served in the 44th Infantry Regiment for seven long years.

2. His Personality.

He was reticent from his boyhood, and was not amiable at first sight. So he was sometimes misunderstood by his superiors. But the closer I associated with him, the more gentle-hearted and thoughtful he proved to be. I will mention here a few instances in which he clearly expressed his sense of sacrifice.

(1) When he was a pupil of the Central Military Preparatory School, he heard one night that three pupils who were the graduates from the Kumamoto Local Military Preparatory School, like himself, were to be bullied by some other pupils graduated from different local military preparatory school. He resolved at once to protect the victims from the bullying pupils. A quarrel and fight ensued. He was found in the act by an officer on duty and was punished. After this event he was looked up to as a boy of noble character.

(2) When he was the commander of a company, his regimental commander repeatedly told the officers in the regiment not to beat privates. One day a young 2nd lieutenant beat a private under him. The regimental commander heard of the fact and was going to punish the rash lieutenant. The company commander INOUE himself was against such an illegal act as beating privates, and had repeatedly told the officers under him to refrain from resorting to such a barbarous means of training. He, however, made up his mind to save the offender and went before the regiment commander and confessed that he had allowed the lieutenant to beat the private. I hear that he was punished by the regimental commander. Of course, the lieutenant felt greatly ashamed of his offense, and at the same time was filled with profound gratitude to the company commander, for whom he did everything in his power to repay for the sacrifice.

(3) Once during an annual manoeuvre, a certain sergeant major under him went to the headquarters of the battalion to receive instructions. The sergeant misunderstood the meeting place of the battalion on the following day, and this caused confusion. The battalion commander was in a rage, and was about to punish the sergeant. Hearing this deplorable situation, INOUE, company commander, went immediately to the battalion commander and said, "It is I who am to be blamed. I misunderstood the instructions."

Exhibit 39 (a)(1)

0384

The above is only a few instances in which he displayed his sacrificing spirit. He was so good-natured that he was often criticized as being stupid by others who did not understand his personality.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.



EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 39 (a)(2)

0385

略証言書

一 井上貞衛氏と相識に至る経緯

大正十三(九)月頃より同師團に勤務して居りました。

二 略証言

井上氏に豪膽な実と責任感の強、平面實に情深、
方では

私が昭和十三(五)月から二(三)月余、漢口の陸軍病院長を
してゐた時に、彼の部下が入院すると氏に必ず見舞に
来られて慰めに傷病兵を慰問されて居ました。

このやうな事に戦時北(北)の時に口々に「行はるるに
事です。井上氏に丁度お見舞い見舞の部下の傷病兵
を慰めに来られては、部下に勿論、診療に従事す
る我々も非常に感激した次第です。

昭和十三(五)八月廿二日

高知県高知市大膳様所

川北 伊勢吉 

Exhibit 40

0387

August 22, 1948

/s/ KAWAKITA, Isakichi, (seal)
Daizensama-machi,
Kochi-shi, Kochi-ken.

Testimony to the Personality of INOUE, Sadae

1. How I became acquainted with him.

We have been friends since September, 1923, when we were serving in the same military division.

2. His personality.

He was courageous, but at the same time was full of kindness and sympathy.

I was the director of the military hospital in Hankow in China for more than two years from 1924. Whenever one of his subordinates was sent to hospital, he came to see the invalid.

At that time the officers were extremely busy, but he invariably managed to find time to console and encourage his sick subordinates. It is needless to say that his humane act impressed deeply not only his subordinates but also we who were engaged in medical treatment.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

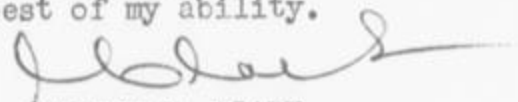

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 40 (a)

0388

人格証明書

- 一 私と井上貞衛とは^(私)大正四年(一九一五)高知聯隊に少尉任官以来同聯隊の先輩として其訓化を受け大正十一年五月より約一年間^は中隊長と仰ぎ、其指揮を受けたる関係がありました。
- 一 井上貞衛は正義観念と責任観念の旺盛な実には稀に見る人格者であり、太平洋戦争に於ける師團長としての卓越せる統帥に、同じく日本軍内でも知名の將軍でありましたことを茲に證明いたします。

昭和三十三年九月十日

高知市吸江八七

久野村桃代^(印)

Exhibit 41

0390

Testimony to the Personality of INOUE, Sadae

1. Relationship:

I became acquainted with him when I was a second lieutenant to serve in Kochi Regiment in 1915. There he was one of my superior officers. Especially, for about one year from May, 1922, he was the commander of the company to which I was attached.

2. His personality:

He was a man of high personality, being strong in the sense of responsibility and justice. His excellent leadership in the Pacific War was well-known in the circles of the former Japanese army.

September 10, 1948

/s/ KUNOMURA, Momoyo, (seal)
87 Suie, Kochi-shi.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

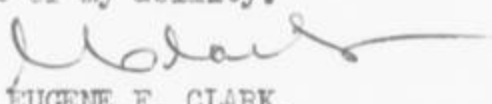

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 41(a)

0391

人格証明書

私達は井上貞衛。部下として大正十三年から
同十五年迄勤務致しました

井上貞衛氏は道性温厚にして平素部下
に對しては寛大な慈愛の如き愛情を以て
あれは當時稀なる民主的人で御座
ました。今般戦犯者として指名せられる事
を聞き全く夢の如き感を受け、事貞衛氏

上司よりの命には従ふかも知れませんが貞衛
氏の性格として自身より犯罪を構成する
が如き意志は一寸毫も御座りません
今般連名を以て御証明致します

昭和三年五月十日

香川県仲多度郡善導寺町上吉田

横田良平

香川県仲多度郡善導寺町上吉田

白井新治郎

Exhibit 42

0393

Certification of Personal Character

1. We served under INOUE Sadae, from 1924 to 1926.

2. INOUE was a man of gentle disposition and used to treat his subordinates with maternal love. He was also a man of democratic ideas rarely found at that time. When I heard that he was designated as a war crime suspect we wondered if we were not dreaming.

He may obey his chief's orders but he is not a man to perpetrate a crime of his own accord.

We hereby testify to the above and put our joint signature.

August 12, 1948.

/s/ YOKOTA Ryohei (sealed)
Kamiyoshida, Zentsuji-machi,
Nakatado-gun, Kagawa-ken.

/s/ SHIRAI Shinjiro (sealed)
Oaza-Yoshiwara, Yoshiwara-mura,
Nakatado-gun, Kagawa-ken.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.



EUGENE F. CLARK,
Lieutenant (junior grade),
U. S. Navy,
Interpreter.

Exhibit 42 (a)

0394

人格證明書

一 私、西暦一九四四年六月井上貞衛殿ニ由リニカ、ル機舎ヲ
 得マシテ南米民同人トシテ度々温顔ニ接シ終戦後パナマ
 島ヨリ帰還、途ニ蘇々直前迄(一九四六年二月)同氏、中
 宿舎ニ由リ古語ニナリ朝又親シク謹厳高潔ニシテ慈愛
 保、情ニ厚キ中、人教、聲、咳ニ接シタ者デアリマシテ、中
 ノ井上殿、中、人トナリテ尤モヨク知ル一人デアリマス、サレバ今尚
 敬慕、念葉ズル能ハザルモ、ガアル、デアリマス、たニ井上貞衛殿
 パナマ島ノ丘在中、ハ動靜ニ就、私、感ニマシタ一端ヲ列記
 致シマス

一 井上貞衛殿、南米方面ニ出征セラレタ後、軍人中稀ニ見、中
 人格デアリマシテ其信條トスルモ、ハ終始一貫正義人道ニシテ諸
 席南米諸嚴格内ニモ慈愛保、ソレガ部下軍人、上、ニニ限
 ラス中、農島氏一般ノ上ニモホ当時捕虜トナツテ来テ居リマ
 タ「インドネシア」、日常ノ上ニモ思フ致サレ一視同仁、中、ハ以テ、
 実ニ血モアリ涙モアル其ニ典型的將軍デアリマシテ又終戦
 後、特ニ道義、床頭ヲ憂イテ其野場ヲ高唱サレマシタ
 サレバ井上殿、終始一般、敬慕、的デアリマシタ

一 井上殿、捕虜、待遇日常、給與ナドニ特ニ心ヲカケラレ私共民同
 人ガ羨シク思フ程デアリマシタ、其一例ヲ上グレバ戦時中煙草
 ノ飲上、何モ苦痛ヲ感シテ居ルノニ捕虜ハ不自由ナク喫煙ニテ
 喜々トシテ働タ居ルヲ見マシタ、同、近ニヨレバ捕虜達ハ尚ニ氣
 毒ナ人達デアルカラヨク見タヤト、上司、命ニヨルモノナリト以テ
 井上殿、國境ヲ超越シテ、一視同仁、心、程ガ同ハレルデアリマス

一 終戦後インドネシア、本國ニ帰還、際、失ニ勵イテ居ワタ日交
 ニ保護サレテ歸國シタイト云ハレタト、噂ヲ耳ニシマシタ人情ニハ
 國境アリヤセンサエアル事ト思ヒマシタ、之等モ彼等ニ対スル日頃
 仁慈、反影ト思ヒマス

No. 1.

年 月 日

神 足 用 箋

No. 2.

- (井上殿ハ桐蔭、病死(イドネシヤ)ヲ怨ルニ部族ニ命ジテ祭ヲ
埋葬セシメラシク淡グマニイ光景ヲ私共ハ目撃シマシク
- (終戦後米軍、米島ニ當リマシキ吾々人ハ、動搖ヲ内ニ生ジテ
居リマシクガ井上指揮官、進駐軍ニ村スル訓示(輕子命古
動ナキ原)祭セラルルヤソレモ杞憂ニ帰シテ島内静謐ニ
又其夜モ進駐軍ト同ニ睡リ、不祥時モ起リテ兩者、交
渉モ常ニ和氣霽々ニ進ニ山崎ニ進ミラレ左佐氏ハ何事、不
安モナキ事ニシテ在任スルヲ待タシク又引揚ニ當リマシキモ終
序懸然トシテ萬事順調ニ進バ一同無事ニ帰國ニ得
マシキ事ハ米軍、特別ノ厚意ニヨル事ハ勿論デアリマスガ
亦井上殿ハ謹シ敬ニシテ山崎タルヤ人故ガ日頃米軍ニ敬意
シテ、賜ト一同感激シテ居ルデアリマス
- (井上殿ハ戦禍ニヨリ家族ト別ニ寄ルベキ老農夫ヲ省名、附
近ニテ農耕サセ時々訪ナラシテ慰撫面會見ラル淡グマ
ノ事モ見、亦莫ク未ダ感激シタリ
- (井上殿ハ戦禍、為メニ親兄弟ニ別ニタル孤獨、何憐ノ婦サ
萬一、過テキ原ニト部下ニ命ジテヨリ保護セシメラシマシク
- (真面目ナル或一家族ガ住ム所ニ趣方ニ生キミ居ル事ガ井
上殿、耳ニ入ルヤ血ニ其想ヲ誦ベサセ附近ノ生家ニ興
テテ生ハシム
- (井上殿ハ終戦後戦病死者、遺族ヲ一々見舞ニセ怨ルニ早慰
サシマシク私共莫一莫ト共ニ余ツタ事モアリマス
- (生死不明ノ部下ニ就イテハ面會余リテ徹底的ニ調査シテ
揚子夫々其遺族又ハ内地ニ報告サシマシク部下及遺
族ノ思フ、情、傷々、伺ニ知ラルデアリマス
- (終戦後戦病死者、慰霊祭ヲ奉行ニ怨ルニ部下、聖ヲ
尊ク祭ラシマシク
- (宗連又ハ利権ヲ持ニガ為メ阿諛好言ヲ以テ接近スル如キ者
ハ徹底的ニ排撃シテ存ニ正義人道ヲ信條トシテ正邪ヲ
明カシ清廉潔白胸中更ニ一兵ノ曇ナクサレバ日常、談

年 月 日

神 足 用 鑑

話中ニ序々其言動ヲ見テシタ。其一例ハ昨日迄出入リテ許
サレタ居リシ者ガ人道ニ反スル行為ヲナシタル者、即時出入
リテ禁止サレタル如キ。

- 一 農氏、病氣ニモ常ニ心ヲヨセラレ薩陽ニ慰メ、分ハリ下サ
イマシタ。私モ野・アツク其慮ヲ受ケタ一人デアリマス。
- 一 井上殿ハ最高指揮官、泉位ニアラレタガラモ日常ヨリ着用、
腹ナドハ實ニ余等ニシテ一兵卒ト何事異ナル事ナク他、押
シテ知ル可ク其清康同ニ知ラルルデアリマス。

以上ハ私ガバラオ島ニ在任中其目ニ写リ又心ニ感シマシタ記
憶、一部ニ過ギアセシガ之等ニ依リ井上貞衛殿、其人トナリシ
同憶ニ知ル事ガ出来ルデアリマス。此ハ私等ニ知ラレザル薩
レタル由ニ像タタアト信ジマス。

今、本國ハ其戦後王室和議ヲタリト雖モ既に此タル経済
界及思想界、ホウ急域域ヲ脱セズ又國民ノ道
義ハ低下奈頼シテ人道地ニ流レテ國及口ノ端ハ
兩建ヲ高唱ストモ現状ニテハ兩建モ前途ホ空遠
難事、難事ニシテアルモノ、日夜憂フル延ナリ
斯ノ際ニ井上貞衛殿、ホキ謹微ニシテ清康且平和
愛好、念ニ燃ユル尊キ信念、所有者ガ日本、兩建ニ又左
界平和ニ貢獻サルハ甚大ナルヲ思フ、時國民ノ健在
ヲ切ニ祈リテ己マタイデアリマス。

以上

西曆一九四八年八月一日

神足徳三郎

No. 3

年 月 日 神 足 用 箋

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Exhibit 43

0398

August 1, 1948

/s/ KAMITARI, Tokusaburo. (seal)

Testimony to the Personality of INOUE, Sadae.

I am sure that I am one of those who know INOUE best. For I lived in the building where he lived on the island of Palau from June, 1944 till February, 1946.

I was a civilian, and not a soldier. Because I was a civilian, I know, I believe, the true personality of INOUE better than ex-servicemen do.

I should like to relate a few remarkable characteristics of INOUE in the following.

(1) INOUE was conspicuous as a soldier of flawless character rarely found among the Japanese soldiers despatched to the South Seas. He was looked up to by the Indonesian prisoners of war, not to speak of the Japanese or the natives. Especially, after the end of the war, his influence was great in keeping up the morale of the Japanese.

(2) His treatment of the foreign prisoners of war was almost perfect. We civilians were sometimes envious of the life of prisoners. Cigarettes were quite hard to get at that time. The foreign prisoners were, however, rationed more tobacco than the Japanese soldiers. He used to say, "Foreign prisoners of war must be comforted and consoled, because they are spiritually miserable." He acknowledged the fundamental human rights of prisoners. He was not extra-nationalistic minded. He was a disciple of internationalism.

(3) Those foreign prisoners of war said at the time of their repatriation, "We want to return home on board a Japanese ship, being escorted by the Japanese soldiers with whom we have worked agreeably." This shows distinctly the milk of human kindness possessed by INOUE.

(4) INOUE ordered a funeral to be held, when a prisoner died. The funeral procession impressed us civilians deeply.

(5) Immediately after the end of the war, INOUE ordered all his subordinates to be entirely co-operative with the American Occupational Forces. At first, some uneasiness was harbored by us concerning the safety and order on the island, but we were totally re-assured at the sight of the peaceful condition after the Occupational Forces landed on the island. At length, we were able to return to Japan hale and sound. The wise and humane guidance of the Occupational Forces made this peaceful repatriation possible, but at the same time INOUE's personality, I believe, made it easier.

(6) During the war, he visited many war-victims, such as those aged farmers who were bereaved of their families, and consoled and encouraged them from the bottom of his heart.

(7) Especially he protected orphan girls, lest they should undergo any mistreatment.

(8) Once, hearing of a homeless family, he tried to find a suitable dwelling and let the family inhabit it.

Exhibit 43 (a)(1)

0399

(9) After the termination of the war, he called on the bereaved families of the war-dead and consoled them heartily. At one time I myself accompanied him.

(10) The investigation of the missing soldiers was carried on strictly, and life and death of them were reported to the next-of-kin in Japan before the repatriation from the island.

(11) Soon after the end of the war, he held a memorial service for the war-dead.

(12) He hated flatterers; he wanted to be intimate with only those honest civilians. A civilian who was found to have committed a deed against humanity was immediately prohibited from calling on him.

(13) He was not indifferent to even a slight illness of a peasant. In time of need, a sufferer was invariably consoled and encouraged by him. I myself have had a personal experience.

(14) INOUE was in the highest rank on the island, but his way of living was quite simple. The standard of living was almost the same as that of a mere private. In this respect, as in other respect, he was quite democratic-minded.

The above is a few of my recollections of my life on the island. There must be many exemplary instances concerning INOUE. Yet I believe that the aforesaid few examples are enough to illustrate the intrinsic personality of INOUE.

Three years have already passed since the termination of the war. Yet, the present Japan is, sad to relate, in a chaotic condition both economically and spiritually. Above all, the degradation of morality is deplorable.

It goes without saying that the war-torn Japan ought to be reconstructed both materially and spiritually.

At this time of all the times, I hope that such a noble and disinterested person as INOUE may be permitted to live on for the purpose of devoting himself to the reconstruction of the war-damaged Japan.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

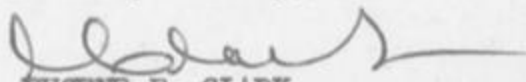

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 43 (a)(2)

0400

陳情書

元陸軍中將井上貞衛氏は昭和六七年の次中佐
 となり時私に権限ありて東京学校長を都の
 同校に配属し校長として二年の勤務せられた
 井上中佐は其時陸軍部内に権限を得意の境
 遇に置かれ居らるゝと私は考へて彼を配属
 校長として之を遣ふことは彼には尤常に不平
 であつたと見へる彼の性格は至つて辛直にして上官
 に命令するが如きことは女一にもあつて居らず
 彼は不平。遂に之を遣ふ行けば何かに實を見せざる
 校長を辭職し之を引き上げんと考へていつ
 赴任したるが如きであつたと思ふが故に之を遣ふ

事を見らるゝと客に相違して之を遣ふ事には彼の
 意を全く投じて二十二年の實に愉快に且有意
 義に暮らしたることは彼が終戦後師範校を模
 範では何人にも要せず第一に私を訪ねて物語
 した一節でありませう然くは彼は軍人ではあつた
 が生れがらの民主主義自由主義の素質があつた
 爲めと私は信じて居る其れは権限ありて
 東京学校は當時自由主義教育を標榜し
 て居つた唯一の專門学校であつた爲め彼と意
 合した理由と存じます
 彼が終戦後時六方面に於て米海軍に在りて

将の命の下に降参の所置を取扱ひし。だが降参の後私
に「あなと申すや女将の人となり王様讃し何れを内に
口より女将が日本に來りし人ぞ。然に一席女将を拒得
いたすから私も同席せしと申され女将を拒載しと申た
ハニテエの種子を私へ與へ私を載せし。わは信あり
も彼は日本軍人中稀に見る自由主義者であることを思
ひあはす。

横濱高等女子学校が私が在学中の一人。配属
将校中彼程女子を可愛せられた軍人であつた彼
は学生に向ふ精神能には嚴格であつたが形迹部の
事、同じとは覺大であつた彼は今如何なる戦犯
の罪に問はれつゝあるか私には詳細不明ながら或は

部下に對し覺大であるか一面で部下に語られたことも
あらずと私をして感ぜしこともあらず。

私と彼とは二十二年に亘る交友であつた。彼は日本
傳統の武士道的精神家にして他の多くの軍人
と異なつたものであつた。彼れには寸毫も残忍性
があつた。最も勇敢であり且情熱的であつた。
は人が戦犯罪に於て裁判に付せられて居るときは
私を意外と云ふまで彼等に堪へさせん。彼は私の子
であつた。横濱高等女子学校に於て彼の教を受
けた青年軍中にも同席であると信じてゐる。然くは
降参後に於て彼の真罪が宣言せられんとす。

一週の日夜熱望を願ふて可なり

昭和十三年七月二十五日

前横濱高等商業学校長

鈴木達治

0403

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Exhibit 44

0404

CHARACTER CERTIFICATE

While we were students of the Yokohama Higher Technical School in 1932, we became acquainted with Mr. Inoue who was attached to our school as a military officer. We associated with him so closely that we used to visit him.

Unfortunately, the war broke out and he was called to the front against his will, so we did not see him again but two times.

We were instructed by him for only two years but we had never forgotten him.

In his lieutenant colonel days, namely in his school-service days, he had liberal ideas which were quite different from the feudalistic and bureaucratic ideas held by ordinary soldiers.

On the other hand, the Yokohama Higher Technical School to which he was attached was the only school in Japan standing for liberal education under the direction of Mr. Tatsuji Suzuki. So Mr. Suzuki's policy for liberal education was often opposed by the government authorities at that time.

As a soldier, Mr. Inoue should have had an opposite opinion to the Director Suzuki, but he studied the director's ideas and became congenial with him. We heard sometimes that he was censured by some soldiers' party.

As a matter of course, he was very strict for the observation of the school regulations. Accordingly, though he was reproached by some students at first, his democratic ideas and humanness were enough to soon attract them. He was loved and respected by all of the students and was called under the nickname of "Gandii."

He used to teach his students that they should keep the social order judging from their reasoning powers. Especially, he explained if they did not deny the communism, they could not expect a peaceful world. Anyhow, Mr. Inoue's ideas and character were very novel in comparison with those of the soldiers who were influenced by militarism. We still love and respect him in spite of several years separation.

For us, the most impressive and unforgettable memory of him was the meeting with him at the "Peiping Hotel."

Then we lived in Peiping in North China and Mr. Inoue happened to pass there as a commander in the Southern District from Shangsi.

It was a meeting after thirteen years absence. When the war became the topic of conversation, bending his head he said to us, "If the war is over, I will become a priest. I made many subordinates dead in battle as well as enemies. All of them were sons, fathers and husbands. They were innocent as individuals. I really don't know how to apologize for them. I would like to be a buddist priest to pray for the repose of their souls." And when the topic of conversation became on the future of Japan, he told to us, "Those who mislead Japan are none other than the soldiers who meddle with the political affairs and ignore public opinion."

Exhibit 44 (a)(1)

0405

人徳證明書

一 私は神足三郎の事を知り、
夫と共ニ戦争中はバネをもち、

井上貞衛殿とは神足、同様の知り合の
関係で知っています

井上貞衛殿が三郎を指揮官として其高潔
清廉、一視同仁、殊に人徳に、我は優れ
居られた其所人徳が部下に及んで
局外の人々にも人々の目にも涙と感激は
頭の下がる程なる実を述べたい所です

一例一 未だ中絶激しくし頃、吾々の
信をあらう所、何れは衛生隊があり、
或は其所へ大勢の捕虜達が、
と飾られる惨状を、かつて、
日々の軍医の意は、何を言いたか、
隊長初め一同が、丁重に、
リ、其惨状は、再び、
若くは、盛大に、
後で、
一捕虜は、此の衛生隊を、

分けておりましたが其甲斐もなく死にいた
りたので今其年原を葬儀を致させた
のだ。といふておりました。此をゆく者。皆
非常に感激いたすておりました。
最高指揮官井上俊は、この事を一同に、皆
徳高く其温かい手は捕虜の一人一人をな
しなすておりました。

一例ニ。内地との連絡は絶たれ。わが方では
非常な食糧難に遭遇し、その時最高
指揮官は非常な心痛せられ、その方
法が満せられ、其一つは、兵隊が
少く、食糧は余給のある山奥からとる
井が沢山を運ぶおそれ、その橋は暴撃で
全部破壊され、車は其用を失せ、その
地方の兵隊と捕虜の隊とが車を替り、
長い山道を運んでおるもの、又、
けり、其頃、煙草は尽き、その
兵隊、煙草を吸う者はおろ、又、
けり、その捕虜達は時々吸う煙
草を、不思議と思つておりました。又、此人達

はまき等「ふんく」とはみも遠くお
ろそ是は捕虜は可成に想な者である
から云々の待遇を與へる様子」との命令で
此人を日人兵以上のふれを食けて煙草
も不自由せず満足し愉快を三くといふ
御いてゐるのだといふ事をする

一 例三 戦は終る捕虜が口へ煙草を
する時他等は「日本の服で帰りたい 今もど
やだしく世話をして下さい」日本の兵隊
達は送り出して「帰りたい」といふは横
断れを惜しんでゐる事

一 例四 戦の終る今も兵隊は
手取でも鼻取でも一人でも死なせはならぬ
可成に想な餓えさせるな 希死をさせぬ
が医者をえんが施す様子」と言ふが
揮官は医官を山の奥の隅々まで巡
らせるといふ事をして地方民は好む所
即ち「可成に知らぬ人」秘甚しむ事
は其の意をなす事

一 例五 終戦後又なる軍が来る事

駐留：とまおりし時、日本の軍隊も
民間人も島民も命令をよく守る静粛
は驚くべきもので、是は固く信頼し
てゐる。然し、一面、意氣は満ち
た日本の最高指揮官、おられたから
ありませう。やがて迎賓團が運こられ、此
で駐留軍の幹部と日本の幹部との会
談がなせられし接待役として選
ばれた十数人の日本婦人は、其都立山の
奥からあけられ、私も其一人で押せ
ました。其会合は、いつも和やかで「これ
昨日まで敵となり、味方となつた人々の
会合であらうか」と思はれる程の和気藹
々たるもので、凡そは感激は満ちた
けうであつた。これを足すことも如
き井上毅が円満な市人俗と平和主義
で又理想の強いお方であつたこと、
お方とは同じです。又接待は選
ばれた婦人達は皆良家の人々であつた。
幹部の市人俗であつた。と先

ならぬ。彼等、人々を許さず、専ら己に
こればかり最高指揮官の中心に置いてお
たやま。井上馨の陣中、私生活は
実、己に専ら、他を全く置き、其
の中心に置いた。

一 例六。 以上、内地の情勢と
するが、他口で、彼等、混乱や、悲憤
するは、一つ、己に専ら、秩序あり、理想あり
有る、取柄を、おぼえて、情勢、彼等、は、この、情
有、能く、感じ、し、た、る、が、親と、子の、情、
も、ふ、た、る、夫婦、も、あ、と、い、ふ、は、別、れ、
し、た、る、年、何、れ、を、奪、い、し、た、る
とか、病人、を、や、り、お、さ、れ、た、と、い、ふ、情、
哀、れ、を、目、に、し、て、は、す、同、じ、あ、い、し、た、地、
帯、を、お、さ、し、た、る、は、一、方、の、軍、の、お、お、
意、は、よ、う、に、は、あ、り、ま、す、が、最高指揮
官、の、日、頃、の、情、勢、を、人、格、の、反、映、し、
た、と、一般、に、い、う、は、た、事、の、お、お、さ、れ、
た、の、と、人、は、心、を、感、謝、し、た、り、ま、す。

一 例七。 彼は、最高指揮官、と、い、ふ、は、

井上毅の側近は在るお世話を承る人
が婦人は對しての理解深く又市
同僚は多くいつれも其から兄弟でも
更には立派な紳士を育成せらるゝと云ふ感を
始終いたす可し

この存立派な所方は此れ長く所健在せ
らるゝならば敗戦のその国連にせぬ
許り貢献せらるゝのみであらう
とは万人等しく思ふ所であらう
又其円満するに僅微と云ふ義は強く
人を尊重せらるゝ、邦人格とは必ずや
世界の平和も大なる貢献の有らう
を確信いたす可し 何卒此の日の平
の爲世界の平和の爲に 井上真衛毅の
永く市健在ならん事を神に
衷心より祈るやせません

以上

西曆一九四八年八月一日

神足りて(11)

August 1, 1948

/s/ KAMITARI, RIKI. (seal)

Testimony to the Personality of INOUE, Sadae.

I am wife to KAMITARI, Tokusaburo. Both my husband and I lived on the island of Palau during and after the war and we were close acquaintances of INOUE, Sadae.

We were civilians, but we respected Mr. INOUE as much as the soldiers under him did, because his attitude towards we civilians was full of kindness, humanity, and justice. I should like to write down here a few examples which show eloquently what his personality was like.

Example 1. At the time when the air-raids were heaviest, there was a dispensary just opposite our dwelling. One day many prisoners of war carried a stretcher on which a dead body was covered with beautiful flowers. When the stretcher stopped in front of the street door of the dispensary, several Japanese military surgeons stepped out of the dispensary and handed a sheet of paper. The chief of the dispensary and almost all of the Japanese there paid homage to the memory of the deceased and the funeral procession gently moved to the grave-yard. Afterwards, I learned that a prisoner of war was taken ill and a number of persons in the dispensary were exceedingly kind to the invalid. In spite of the hospitable treatment, the sick prisoner died and Commander INOUE readily permitted the prisoners to hold a funeral. The funeral procession stopped in front of the dispensary to express gratitude to the surgeons and others. Indeed, INOUE's love was beyond nationality and the boundary of a country.

Example 2. At the time when the traffic between the island and the home-land was suspended, the shortage of food was terrible. At this juncture, Commander INOUE did everything in his power to alleviate the suffering not only of the soldiers but also of the civilians. In the mountainous regions, the number of the natives was comparatively few and the quantity of the food-stuffs was comparatively ample. Commander INOUE forthwith bought a great quantity of a kind of taro. Transportation by cart was impossible, all the bridges in the neighborhood having been destroyed. So, a long line of Japanese soldiers and foreign prisoners with loads on their backs were seen everyday. Cigarettes were also in extremely short supply. Japanese soldiers seldom tasted cigarettes at that time. On the contrary, foreign prisoners often smoked joyfully. At first this was strange to we civilians, but later the enigma was solved. Commander INOUE had ordered to ration cigarettes and all other things to the foreign prisoners of war before to the Japanese. He always said, "The life of a prisoner is one of the most miserable fates, so we must treat a prisoner as warmly as we can."

Example 3. After the doomed war ended at last, almost all the prisoners of war said, "We want to return home on board a Japanese ship. We want to return home, being escorted by the Japanese soldiers who have been so kind to us." This, I believe, shows clearly what sort of character Commander INOUE had.

Example 4. "Now that the war is over, not a single life ought to be wasted," Commander INOUE used to say after the war. He ordered all the surgeons to go round even to the remotest part of the island to examine not only the soldiers but also all the civilians. I personally heard him utter the above mentioned words.

Exhibit 45 (a)(1)

0412

Example 5. When the American Troops occupied the island, the conditions on the island were in perfect order. Commander INOUE's order to be obedient to the Occupational Forces was observed literally by every Japanese. In due time, the Hall to receive the American guests was built, where the high ranking officers of the both Armies and Navies had frequent liaison. More than ten Japanese women were selected to be waitresses at the Hall, I being one of them. The meeting here was always full of hospitality and good-will. I wondered if the party were really inveterate enemies only a few days before. This peaceful condition was due to, at least in part, to the personality of Commander INOUE whose heart was filled with peaceful inclination. He was mindful of selecting the above mentioned Japanese waitresses from among the respectable women. Throughout the war, he thought little of himself, always thinking much of others.

Example 6. Soon after the end of the war, in areas other than American occupied ones, I hear, there ensued many miserable instances to the fate of the Japanese residents. Parents and children were separated; husbands were severed from their wives; belongings were robbed; invalids were forsaken. On the island, however, everything went on smoothly and satisfactorily. It is needless to say that the democratic spirit on the part of the American Occupational Forces realized this ideal condition, but the personality of Commander INOUE contributed not a little to the peaceful repatriation of we Japanese.

Example 7. I was always in close contact with Commander INOUE, together with my husband. Therefore, I know his personality quite well. He was especially amiable and gallant to women. He was not merely a fighting man, but a true gentleman.

If he be permitted to work in the democratized Japan, he will surely contribute to the re-construction of that war-torn country and will surely contribute to the peace of the whole world. This is my heart-felt conviction, so I pray to God in heaven that he may be permitted to live on for the new Japan and for the whole world.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability

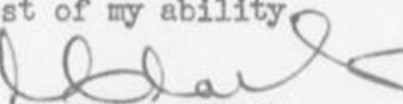

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 45 (a)(2)

0413

元陸軍中將井上貞衛人格證明書

井上貞衛氏は思慮深遠に義
に富みと崇高なる人格者で徳
望あま方なりと

昭和三十三年八月十日

高知市東久方

岡井秀重

[Redacted]

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[Redacted]

[Redacted]

Exhibit 46

04 15

[Redacted]

TESTIMONY TO THE PERSONALITY OF EX LIEUTENANT GENERAL
INOUE, Sadae.

INOUE, Sadae was a person of noble character, being thoughtful, righteous and benevolent.

August 10, 1948

/s/ TSUTSUI, Hideshige, (seal)
8 Higashikuma, Koochi-shi.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

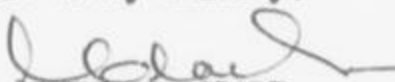

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 46 (a)

04 16

人格証明書

一 私と井上貞衛氏との昭和九年
近々東京居留国民会議員の関係下にて接近し
居りました

一 井上貞衛氏の真知知人の特質として見かけの
態度や口調が荒々しく、あつたが、其の
性格は金と実業に実と愛情の持ち主で部下
地方人々とも懇交しあはれる人格者として

長野縣松本市西町に在り
元東京居留国民会議員

木谷虎士郎

/s/ TSUCHIYA, Torakichi, (seal)
Former member of the Residents'
Assembly at a certain city in
North China.
Present address: 473 Nishi-machi,
Matsumoto-shi, Nagano-ken.

Testimony to the Personality of INOUE, Sadae

1. How I became acquainted with him.

Being a member of the Japanese Residents' Assembly from 1941 till 1944, I had close contact with him in China.

2. His personality.

He is a native of Kochi Prefecture. The characteristics of Kochi men are somewhat rough both in outward appearance and in the tone of speaking. He is no exception to the rule. His inward mentality, however, was quite gentle, and he was liked by both soldiers and civilians.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

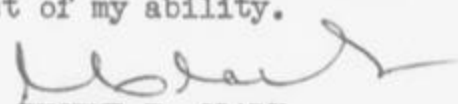

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 47 (a)

0418

人格証明書

井上貞衛氏を北支那刑に於て昭和十五年頃より
予が園内で知り合ひとなり、予は其に對する身と以て非
常に力り便宜とお計りし、公私に於て定規
の内稱で一般民衆に教養を授け、能く人となりを
もて知れ、本市小標ヶハハ

元北支那刑に於て

大原市女子高等学院

大原市女子高等学院

昭和九年

/s/ OKUBO, Motoji, (seal)
Former teacher in a higher
girls' school in North China.
Present address: 88 Koyanagicho,
Matsumoto-shi, Nagano-ken.

Testimony to the Personality of INOUE, Sadae

I became acquainted with him in 1940, when I was a teacher in North China. He used to assist the education in our school earnestly. Thus we became friendly both publicly and privately. His fine personality was widely appreciated by the Japanese residents at large.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.



EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 48 (a)

0420

人格証明書

井上貞衛

表記者最近聞きます井上様は戦犯者として
南方に居られるとの事誠に私個人としては御気暮
に存じて居ります一日も早く疑ひが晴れて歸られ
る事を望んで居ります井上様が私宅の隣りに
来られたのは大正九年であつた以来六年間おに
安くして居りました軍人としては他にあまり見られ
ない様な人格者であつた近所の皆様よりも親まれ
部下兵士の方々の時々私方へ見へて上官殿の
(井上様のこと)為めお叱はれ水火の事をもいけません

大本山 善通寺

と申し居りました井上様は眞實感強く部下
の失策に對して自分が引受けて解決された
ことも度々ありました部下の方々より愛さし
た井上様は限りある事を言ふ様な事を決し
ておられる事はだれも信じて可

昭和三年八月十日

香川県仲度郡善通寺

西土見興

松崎しり

[Redacted]

[Redacted]

[Redacted]

○ ○

○ ○

[Redacted]

Exhibit 48

0422

[Redacted]

Certification of Personal Character

14 August 1948

In behalf of: INOUE, Sadae.

I feel very sorry to hear that Mr. Inoue is being detained in the South Area as a war criminal suspect and I earnestly desire that he will be released and return home as early as possible after suspicion being cleared.

Since his removal to next door in 1920 we had been on intimate terms with each other for six years.

He was a man of character rarely found in the world. So he was respected by his neighbors, and men under his command, calling at my house, told me that they would willingly go through fire and water for the sake of their commander (meaning Mr. Inoue) and that his sense of responsibility was so strong as to take upon himself the faults of his subordinates.

I believe that Mr. Inoue is the last man to commit crimes.

/s/ MATSUZAKI, Shika, (seal)
Fujimi-dori, Zentsuji-machi,
Nakatado-gun, Kagawa-ken.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

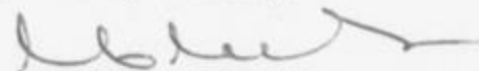

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 49 (a)

0423

人格証明書

井上貞衛

右之者拙宅の裏隣りに数年同居せられ
至極御心よく親密に御多し心致し本人の人格
はよく存じて居ります。常々都下に親身の如く愛
から我が事の様に在訴され近隣の方にも親しまれ
至極円満甚だしい性格軍人とは思ふに温和な人格
者であります決して無慈悲な行爲を以て様の方
へお事は堅信に居ります。此度被戦犯者の疑ひ
あるものうはを耳に致しまん本人の人格を信じて

真言宗 總本山 善通寺

居ります。私共は常先春に堪へせぬ何年一日も早く
御静し被下様取計の程一層に御願申
上ます。

昭和三十三年八月十一日

香川県仲多度郡善通寺町五丁目

辻 忠明

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Exhibit 50

0425

Certification of INOUE Sadae's Personal Character.

TSUJI Tadaaki
Fujimi-cho, Zentsuji-machi,
Tadotsu-gun, Kagawa-ken.

18 August 1948

I know Mr. INOUE's personality very well as he once lived in the rear of my house for several years and we were on friendly terms. He loved his subordinates and looked after them with tenderest care and at the same time he was beloved by his neighbors. He is righteous, amicable and gentle and I firmly believe that he is free of merciless acts. I was told that he was suspected of war crime, and I as well as others who know his personality feel quite sorry for him.

I earnestly pray that he will be released as soon as possible through your good will and benevolence.

/s/ TSUJI Tadaaki (seal)

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

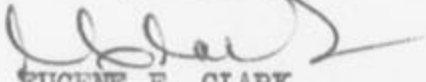

EUGENE F. CLARK,
Lieutenant (junior grade),
U. S. Navy,
Interpreter.

Exhibit 50 (a)

0426

Certification of INOUE Sadae's Personal Character.

TSUJI Tadaaki
Fujimi-cho, Zentsuji-machi,
Tadotsu-gun, Kagawa-ken.

18 August 1948

I know Mr. INOUE's personality very well as he once lived in the rear of my house for several years and we were on friendly terms. He loved his subordinates and looked after them with tenderest care and at the same time he was beloved by his neighbors. He is righteous, amicable and gentle and I firmly believe that he is free of merciless acts. I was told that he was suspected of war crime, and I as well as others who know his personality feel quite sorry for him.

I earnestly pray that he will be released as soon as possible through your good will and benevolence.

/s/ TSUJI Tadaaki (seal)

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.



EUGENE F. CLARK,
Lieutenant (junior grade),
U. S. Navy,
Interpreter.

Exhibit 50 (a)

0427

人格証言書

一、井上氏と相識に至った経緯

(一) 昭和十三年四月、當時滿洲國三江省 勃利に於て
氏の所隊長たりし時代、滿洲國青年義勇隊
勃利訓練所所長代理として、相識交友約二年
半。

(二) 関係、同僚出身、先輩として

二、人格証言

(一) 勇猛典型的武人としての、反面温情と慈悲心に
富み、青少年團を訓練所に少年を訪れ共に談
笑し、園芸を興ふ、少年に珍しき食物等を持参
し慰撫、毎月欠けたりし事

(二) 動物愛護の念特に強く、繁忙なる職務の

古殿をみて愛敬を懐し、人情部隊長として、
愛育の熱意は武人また優ありとの感をも
抱かされた

昭和廿三年十月廿日 高知市旭町一丁目一三番地

高知縣獣医師会会長 赤堀永盛



0000

Exhibit 51

0429

Testimony to the Personality of INOUE, Sadae

1. How I became acquainted with him:

(1) In April, 1938, I became acquainted with him and our friendship lasted for about a year and a half. At that time he was a regimental commander garrisoned in Manchuria.

(2) Relationship: He is one of seniors who were born in Kochi Prefecture.

2. His personality:

He was a valiant and typical soldier, but at the same time was full of kindness and benevolence. While I was in Manchuria, I was the deputy chief of a training school for the Japanese youth to be colonists in Manchuria. He used to come to the training school to encourage the young students who were toiling, far from their mother country. He often brought with him some food or other to be distributed to the students. Indeed, not a single month passed without his visiting the school.

He was especially fond of animals. In spite of his busy military life, he loved his pet dog. His love of animals was well known among the officers and men, who respected him also on this account.

September 21, 1948

/s/ AKABORI, Takuma, (seal)
President of the Association
of Veterinary Surgeons in
Kochi Prefecture.
Present Address: 13 1-chome
Asahi-cho, Kochi-shi.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

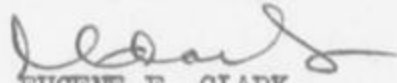

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 51 (a)

0430

多田督知に関する人格証言

No. 1

私は元才十四師団参謀長でありました多田
督知の妻でございます。多田督知と私とは一九
三三年に結婚致しました。私は夫督知の妻とし
て彼の性格素行につまましては誰よりも一
致承知致して居ります。過去十五年間の私共の生
活におきましての私から見ました夫の公私上
の性格行為について申し述べたいと考へます。
主人は現在四人の子の父でありますが子供
に対して厳格な反面非常に愛情も深く過去二
田の出征中も音信は殆ど子供宛のものが多く始

20
11:20 x 10

No. 2

終その成長の予のみ棄じて居りました。
家庭生活におきましても使用人等目下の者には極めて同情心深く殆ど此と云ふ様なるは無くその労を何時も優さしくねぎらふのが常でした。
職務上にあきましては常に部下を可愛がり公私両生活を通じて目下の者が病氣をした場合は殊更平素健康な時にも増して慰めいたわり自分自身よく部下が病氣をした場合は出来るだけ大切に取扱ふ様心掛けをゐると申して居た。

20 x 10

Exhibit 52

0432

No. 3

のを記憶して居ります。
一九四二年から一九四八年十月迄朝鮮京城軍
司令部に在任中、軍司令部に勤務して、おた大韓
国人、馬丁、自動車運転手、やはり韓国人等より五
人の民族を超えた人妻愛はこの様な人こそ、我
々半島人の味方だとも申さる。又軍司令部に長
く勤めたかこ人な人は余り無い等と云はれる。
月給任の時は大変別れを惜まれました。
又半面自分の正しいと信ずるは上官に対し
ても倦まず主張すると云ふやり方で御事、ま

20
15
10
5
20 x 10

Exhibit 52

0433

No. 4.

昭和二十五年七月廿七日

多田 四三子 (署名)

した。然し一と交命令を受けた場合はこれを嚴
肅に実行して居りました。
右の様な性格の主人が係属に對して、ねを取扱
ふ場合決して何等の理由なく、不法な残虐行為
を自ら進むで行つたとは全く信ぜられませぬ。
その矢、十分の考察を願ひ公正且温情ある御
処分を切にお願い申し上げます。

20 x 10

Exhibit 52

0434

PETITION

July 26, 1948

Dear Sir:

I am wife to Tokuchi Tada who was former Chief of Staff of the 14th Division. I was married to him in 1933. As his wife I know best his personal character and his daily conduct.

So I would like to state his character and conduct in his official and private life from my 15 years-matrimonial view-point.

He now has four children. He is, in a sense, a stern father and he is very fond of children.

For instance, while he was at the front, he would write most all of his letters to his children and was very anxious about them. In his home life, he was so warm-hearted that he treated inferiors (employees) well and never scolded them.

In his office, he was very kind to his subordinates especially when they were ill.

I remember that he said to me, "I intend to remember to look after my subordinates as much as possible when they are ill."

From 1942 to October 1943, he was in service of Headquarters, Keijo, Korea.

During this period, he was spoken highly of by the hostlers and drivers who were in service of this headquarters. They said, "Mr. Tada is a sincere supporter of the Korean. We have never served such a kind and warm-hearted man."

He was also a man of principle. If he judged a thing right, he insisted on it to the end even with his superiors. But if he received an order from his superiors, he carried it out faithfully.

Considering from his personal character as illustrated above, I can not believe that without any reason he treated the war prisoners unlawfully and brutally of his own free will.

I hope you will be so kind as to inquire into the above, and heartily implore you that a fair and lenient judgement be passed on him.

/s/ TADA, Yomiko. (seal)

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

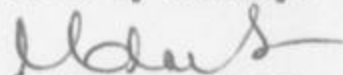

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 52 (a)

0435

OATH

In accordance with my conscience I swear to tell the
whole truth withholding nothing and adding nothing.

Midori Tada.

(seal)

, 1949.

0436

良心に従ひ例案をも脱却することなく又何案をも附加せず眞實を述べ
ることを誓ふ

昭和二十四年二月二十六日

宣誓者 多田 翠

Exhibit 53

0437

No.

1

私は多田督知の長女です。

私から見れば父はそれはい父です。きょうだいは皆

わけだてなくかわいそ下さうした。また世の中はどに對しては

どうも親切にみまひさうした。どうから、父がなと家の中はど

く、なぐさめがありません。愛情なくいたわり合ふこと。

父が私達に教えたことは

勉勵すること。

正義の道について。

父は正義感の強い人でした。私達があやまちをおうた時でも

父はそれをおたへかに親切に注意して下さいます。

どうから、私はやまーい父が一日も早く帰ることを

願っています。

多田 翠

AFFIDAVIT

Oath: In accordance with my conscience I swear to tell the whole truth
withholding nothing and adding nothing.

February 26, 1949

/s/ Midori Tada.

I am the eldest daughter of TADA, Tokuchi. My father, I know, is an exceedingly good man. He is kind and affectionate to his children without partiality. He is also kind to the housemaids. Without him, our home is very lonely and we have no consolation. My father taught me to the effect that we must be affectionate to each other, that we must study hard and that we must be righteous. Whenever we did something wrong, he kindly and affectionately cautioned us not to commit the same mistake again. So I sincerely hope that my dear good father will be back as soon as possible.

/s/ Midori Tada.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

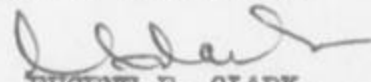

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 53 (a)

0439

SWORN DEPOSITION

Deponent:

Having been duly sworn in accordance with the procedure
followed in my country, I do hereby depose and say as
follows: *Akira Tada.*

, 1949.

0440

宣
書
書

良心に従ひ何事をも欺惑することなく又何事をも附加せず眞實を述べ
ることを誓ふ

昭和二十四年二月二十六日

宣
書
者
多
田

混

Exhibit 54

0441

ぼくは多田督知の長男です。

父はとてもめしたの人をかめいがる人でした。

そしてぼくたちをとてもかめいがしてくれました。

いたずらをするとしかります。けれどもおぼろ父は好きです。

軍たいのときも目下の兵たいもとてもかめいがっていました。

父はあがったことがたいへんきこらいて兄弟げんかをした

ときでもよくよい方と悪い方をさがりえめて悪い方

を必ずきびしくすう意しました。

ぼくたちのやさしい父親がはやくかえってくることをあが

こいます。

多田 渥(長男)

Osira-Tada

No.

1

Exhibit 54

0442

AFFIDAVIT

Oath: In accordance with my conscience I swear to tell the whole truth
withholding nothing and adding nothing.

/s/ Akira Tada

I am the eldest son of TADA, Tokuchi. My father has been a very good
man who takes care of his inferiors. He is especially kind to us. He
scolds us when we are naughty but I still like my father. When he was
in the armed forces, he loved his subordinates. He hates anything that
is crooked. When we brothers quarrel with each other, he decides who is
wrong and punish the bad side very severely. We hope that you will send
our dear father back as soon as possible.

/s/ Akira Tada, eldest son.

I hereby certify the above to be a true and complete translation of
the original document in Japanese, to the best of my ability.



EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 54 (a)

0443

多田督知人 既 証 言 書

陸 軍

予は東京陸軍本部に勤務中、或友人
の紹介によりし多田と親交を結ぶに至り、彼
は屢々予と談話の機会を作つた。彼は
彼の思想や行状を詳細に叙し、その出来
た、其後予が朝鮮軍務隊長であつた
時彼は朝鮮軍務隊長として直接予の部

國皇帝の一番近い輔佐役なり（すなわち）
自覚して皇帝輔佐の道を諒せと説き、
近めをうけて側に在るべき事ありか
これ全く正義人道、就中天地の公道、仁義
徳性の道にあらずと云うなり、熱心に説くを
あるは彼の本心の王の轉ひりある様あり
また自覚して威張させよう（強）い
情あり

陸軍

を説き子修達の主張を生長を輔けつゝ
そのを今も限の所に描くことが出来た
五級の部下に對しより寛大、慈愛を以て
正義氣を貫く線に突撃する事を
見出し、痛ましく

七殊に同率の統法下に在る朝鮮人に對して
は種族差別や、また偏見にとらへる

多田督知人宛 証言書

陸軍

予は東京陸軍本部に勤務中、或友人
の紹介により多田と親交を結ぶに至り、彼
は屢々予と談話の機会を作つた。彼は
彼の思想や行状を詳細に叙べるが、大體
に、其後予が朝鮮軍参謀長であつた
時、彼は朝鮮軍参謀として直接予の部

下とて勤務した 予は一年間を通じて
多田の人格激見を充分に知悉する事が
出来た多大の佐助と尊敬とを彼に拂ふ
様に努めた

彼多田が省共第一師団中隊長として部下の
若く候補生等の中に優在してゐた満洲
國皇太子の弟と皇太子の弟の二人は満洲

國皇帝の屬所に輔佐役たりしは、
自覺して皇帝輔佐の道を諄々と説き、
進めざるを側に在るは、
此れ全く正義人道、
天地の公道、
仁義
徳性の道にあらずと、
熱心に説くを
ありし彼の本心の王の轉りたる様あり
を、
皇族の威風凛々たる様あり

三級が精しく日本教育をうけは著者
の如く彼が如何に高貴な思想の持主で
あつたかよく分るであらう

四級は京城には多くの官舎と多量の官舎と
は隣合ひあつた。級は其子供をつれて平
の官舎へ赴き来たるもの居あつた

其時お徳吉に對し正義と人道博愛

を説き子供達の主張を半長を輔けつゝ
之を今ある限の所に描くことが出来た
五級の下に射しよの寛大、慈愛は常に
正義親を貫く線の上に突進するを
見もし、悔きしを
之殊に回幸の統治下に在る朝鮮人に對して
は、後故差別や、また偏見にとらはる

るを以て朝鮮人を優し朝鮮の幸福増
大に努めしむる一般の朝鮮人て彼は元朝
に接するは皆感激して多田孝博の
人格を尊重し其朝鮮人待遇によつて
を感謝し彼は全く日本の純日本式
士道の体現者である又其実行者
である

陸軍

大田の中心をなすものは正義親である通
主義であった、其れが此の時に彼の
会頭が「誰れをば無き、彼は如何なる
困難な場所にいる、常に此の正義の
愛を要する行を怠らなかつた、を彼の
子孫や彼の部下はよき、」つゝ過僅でも
いふ、知正上人のいふを、予は彼の

許君の何であるかは知らないが多田が旅
は絶対正義と人達を博愛の道から外
小行動や命令で指導するとはやうな
やうに位するものがある

昭和三十一年十一月十日
佐賀市東松町三十二番地
井原 隆次郎

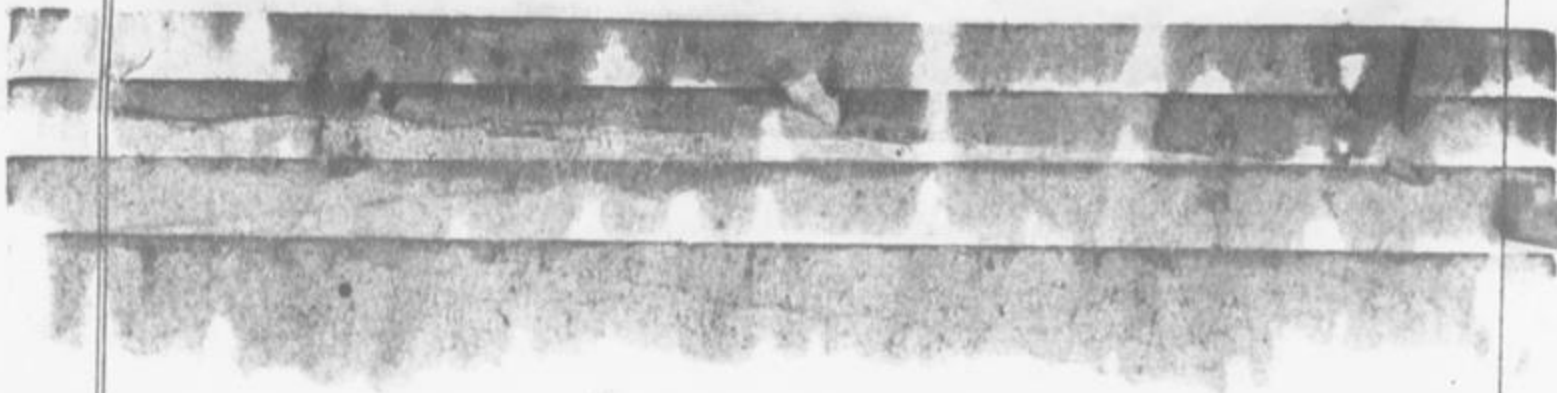


Exhibit 55

0455

Concerning Ex-Colonel TADA, Tokuchi
By Ex-Lt. Gen. IHARA, Junjiro

1. While a member of the General Staff Office in Tokyo, I became acquainted with Mr. Tada who was introduced to me by a friend. Since then, I have had many opportunities to meet him, enabling me to observe and understand his philosophy and behavior. And, later, when I was serving as Chief of Staff of the Japanese Army in Korea, he was a member of the Staff for one year. Thus I came to know him better as to his thoughts and ideas which made me to trust and respect him.

2. While Mr. Tada was a company commander in the First Infantry Regiment, there were two military cadets who were brothers of the Emperor and Empress of Manchukuo. I still remember that I heard him teaching these young Princes their responsibilities as the closest relatives and helpers of the Emperor, and impressing on their minds the principles of justice and humanity. I was convinced from that time that he was a man of sincere and noble mind.

3. He is the author of "Japanese Theory of War." This book will tell his sound philosophy of life as well as his views on peace and war.

4. At Seoul in Korea my official residence was next-door to his, and he often came to see me with his children. In those days, I could study his character and came to respect him more. As a father, he was much concerned about his children's manner and moral education.

5. I used to witness, and hear about his generosity toward his subordinates, acting always in keeping with his sense of fairness and righteousness.

6. Especially, he had no racial prejudices toward the Koreans under the administration of Japan. He treated them kindly and made an effort to enhance their welfare; so liberal was he that the Koreans who came in contact with him all appreciated his warm feelings. He was an able exponent of the chivalrous spirit of the Bushido in its true sense.

7. Mr. Tada's action was invariable motivated by the principle of humanity. He never deviated from it, while he took great pains to show himself as an example to his subordinates and to his own children to regulate their conduct, punishing them if need be. I have no way of knowing of what crime Mr. Tada is suspected. But I do know that he is a man of high principle and that he could never do wrong himself or order others to commit war crimes.

Address: 27 Akamatsu-cho,
Saga-shi, Saga-ken.

/s/ IHARA, Junjiro. (seal)

October 11, 1948.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

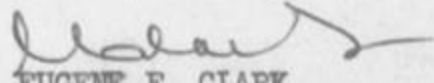

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 55 (a)

0456

元陸軍大佐多田智知の人格素描

一 多田智知を知れる期間及経緯

一九二四年陸軍士官學校入學以來の親友で大尉に達する迄の十四年間を東京歩兵第一聯隊で共に勤務し其の後も親しく交際し現在彼の留守宅の世話をしている。彼の妻は私の義妹である。

二 人格素描

(1) 彼は感情的で同情を誘ふ美點を有して居る。従つて悍勇、抑鬱の如き立場に於かれた者に對し深い同情心を持ち之を處待する彼なことは通時にないことを確信する。

(2) 彼は學究的な人物で武斷的軍人とは頗る異にし彼の陸軍生活は深い思索の下に行はれた。高島廉彦元少將と共に陸軍部内の思想家として定評があつた。大尉時代には東京帝國大學法學部に派遣され法律智識及國際法規に造詣して居る。少佐時代に參謀本部で思想部長として勤務して居た。一九三七年少佐時代に「日本戦争

學」を著し且陸軍大學教官として思想講座を担当した。彼の著書の主眼中に「日本戦争の進み方は日本軍の如きものでなければならぬ。彼も敵を「みなごろし」にするのではなく、敵を味方とするにある。那山の悍勇を獲得し之を征服させて敵の知り難しに彼も味方である。」一註。日本軍は「とり難」はこちちで彼も難しといふことを強調した。この思想は彼の少尉時代からの持論であつて大學教官、參謀本部思想部長、師團の參謀として繼續することになった。「日本戦争學」は昭和十三年八月頃東京日々新聞紙上で有名な思想評論家三木清氏「戦争中及戦後思想家として彼等に接べられ感服す」とによつて世に知られた。

以上の事實によつて彼の悍勇に對する考へ方は明白である。

一九四八年七月二十日

元第十師團參謀長 陸軍大佐
東京警備司令部 第一聯隊

親 友



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Exhibit 56

0458

Character Testimony in behalf of Ex-Colonel TADA, Tokuchi.

July 20, 1948

1. How I came to know ex-Colonel TADA, Tokuchi and how long we have been friends:

TADA, Tokuchi and I entered the Military Academy at the same time in 1924, and we were class-mates. After graduation from the academy, we served together at the 1st Infantry Regiment in Tokyo for 14 years until we were promoted to Captains. Since then, although our places of service were different, we have been good friends. On account of his absence from home, I am at present taking care of his family. His wife is my cousin.

2. About the character of TADA, Tokuchi:

(a) He is a man of chivalry. He has always taken the side of the weak. This disposition of his, therefore, induces me to believe that he must have extended deep sympathy toward war prisoners or internees, and that he never mistreated them.

(b) He is rather scholarly in nature, having different from ordinary military officer. He was fond of meditation. Along with ex-Major General TAKASHIMA, Tatsuhiko, he was well known as a thinker in military circles. When a Captain, he was sent to the law department of Tokyo Imperial University, so he is well versed in law - including international law. As a major, he served on the Army General Staff as the Chief of Thought Sub-Section, and in 1937 wrote the "Nippon Senso Gaku" (Strategical Study of Japan), while holding the Lectureship on Thought at the Military Staff College. He emphasized in his book that the Japanese way of engaging in war should be like that of Japanese Chess (Shoogi); in other words, to try to win soldiers of the enemy to our side, instead of trying to annihilate them, or to capture them and make them contented to be used for breaking up the enemy. (Note: In Japanese chess the player can use the chessman taken from the rival for his own side.)

This is a brief description of his mental attitude which he has entertained throughout his service in the Army. Let me add that the "Nippon Senso Gaku" was highly commended in the Tokyo Nichinichi Shinbun, one of the Japanese leading papers, by Mr. MIKI, Kiyoshi, a thought critic who died in prison on charge of conceiving anti-war ideas.

I hope and trust that the above stated facts will serve to show his way of treating war prisoners.

Ex-Colonel YOKOTA, Hiroshi,
Former Chief of Staff of the
Fourteenth Division. (seal)
Present Address: 1 Naito-cho,
Shinjuku-ku, Tokyo-to.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

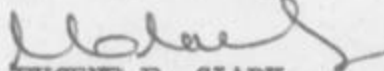

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 56 (a)

0459

小野瀬 一郎

以下私は良心に則り眞実を述べる事を誓ひます。

1. 私は昭和十八年十二月多田督知大佐が第十四師團參謀長としてケ、ハルに着任以来全大佐を知り居ります。當時私は第十四師團隸下の野砲隊に勤務して居ましたが間もなく第十四師團司令部附となり、爾來昭和二十年十二月私がパラオを出發して内地に歸る迄司令部で勤務したので彼の人格及評判に就ては良く知つて居ります。

2. 多田大佐は天皇中心主義に徹した忠誠心の篤い人であり、又非常に職務に熱心な且軍人には珍らしい常識に富んだ人でした。

○ 多田大佐は屢々司令部勤務の若い將校達を集めては彼の戦争哲學に關し、天皇中心の思想を熱心に話されました。

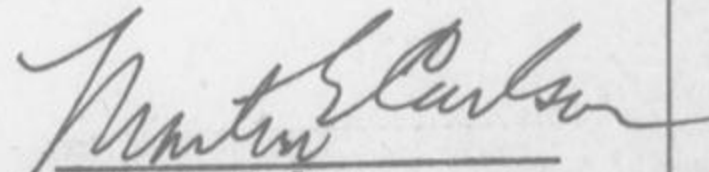
Exhibit 57(1)

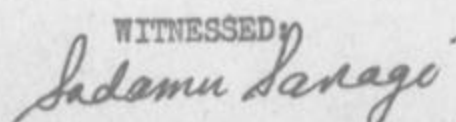
○ 多田大佐は常に井上司令官に対しては子の父に対する
が如く恭謙なる態度を持ち其の職務に熱心なること
は一旦彼が何かの重大な仕事に取掛ると徹宵數夜に及
ぶことは珍らしくなく我々若い將校達も舌を捲いたものでした。
○ 多田大佐は軍人としては珍しい常識に富んだ人で
あり終戦後は屢々司令部勤務の若い將校達を招
いて茶の湯を設け政治・經濟・宗教・藝術等の話を
され若い將校達を啓發すること大なるものでありました。

終り

昭和二十四年四月二十六日

Subscribed and sworn to before me this 26th day of April, 1949.


Martin E. Carlson,
Commander, USNR,
Defense Counsel.

WITNESSED:


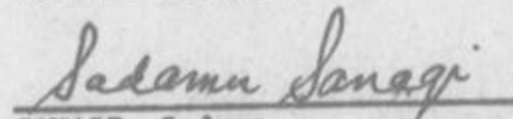

SANAGI, Sadamu,
Defense Counsel.

Exhibit 57(2)

0461

PETITION.

I, ONOSE, Ichiro do hereby swear that the following testimony is the truth according to my conscience.

1. I knew TADA, Tokuchi, Colonel, IJA., when he assumed duties as Chief of Staff, Fourteenth Division in December 1943. At that time I was serving in the Field Artillery Unit which was subordinate to the Fourteenth Division, but later I was attached to the Fourteenth Division Headquarters. Since then until December 1945, when we left Palau to return to Japan, I served with the same headquarters, therefore I knew his character and general reputation.

2. Colonel TADA held the Emperor in highest esteem and was a fervent patriot. He was earnest in his discharge of duties, and for a military man was surprisingly well-informed on various matters.

Colonel TADA would frequently assemble young officers of the headquarters and would talk spiritedly about the "Philosophy of War," and the idea of upholding the Emperor as a gravitating center of existence.

Colonel TADA's attitude toward Commanding General INOUE was that of a child showing respect and obedience toward a father. His devotion to his work was such that once he commenced to work on some important task, he would often concentrate on it day and night and we young officers used to wonder how he could possibly achieve such a feat.

Colonel TADA was, for a military man, surprisingly well-informed on various matters. After the surrender he would often invite the young officers of the headquarter for a tea ceremony and there discuss politics, economics, religion and art and would enlighten the younger officers as to various aspects of these topics.

April 26, 1949.

ONOSE, Ichiro.

Subscribed and sworn to before me this 26th day of April, 1949

/s/ Martin E. Carlson

Martin E. Carlson,
Commander, USNR,
Defense Counsel.

WITNESSED:

/s/ Sadamu Sanagi

SANAGI, Sadamu,
Defense Counsel.

I hereby certify that the above is a true and correct translation from the Japanese translation to the best of my ability.

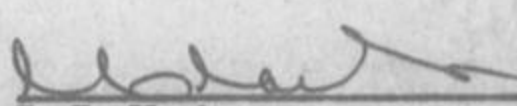

E. F. Clark,
Lieutenant (jg) USN.
Interpreter.

Exhibit 57(a)

0462

元陸軍大佐多田督知の人格証言

(一) 私は良心に従ひ以下陳べる証言は眞實であることを誓ひます

(二) 私が多田督知を識つた期間及び経緯

(A) 1939年5月から1940年2月迄 彼が陸軍大学校の戦争哲学の教官であつたとき私はその学生として教へられました

(B) 1943年12月から1946年3月迄 彼が第十四師団参謀長であつたとき私は同参謀として彼の指揮を受けて作戦教育、編成等の業務に服してゐました

(三) 人格証言

(A) 彼は信念と持つ精神家であります

(a) 帝大で戦争哲学と研究し戦はずして

○ ○

神の道を世界に敷くことにありと論じ
人道に反するを嫌う平和愛好者であ
りました

(b) 此の信念を他に共鳴させるべく努力を
いたしました、著書 日本戦争論があ
ります

(c) 彼は軍の統率は恩愛感情を以つて
方針とすべきことを理念としていました
従つて指揮下の我々はその方針で統
率されていきました

(B) 彼は責任観念の強い人です

(a) 師団長の意図命令指示等を師団長
の部下に伝達するときは大小となく
師団長の意図命令を如何に

最善完全なものにするかには常に大
きな努力を払っていました

(b) 師団長の意図命令指示の実行結果
を確認するのも熱心に努力をしていました

(c) 彼は性格的には弱い人でありました

(a) 一つの策案を樹てる時には多くの人々から

意見と求め毎心のゆく完全なものに

なるまでは大へん心配していた又言葉

では強さうな事を表現するが性格

的には弱い人でありました

(b) 彼は腹藝も使つて上官をさしおいて

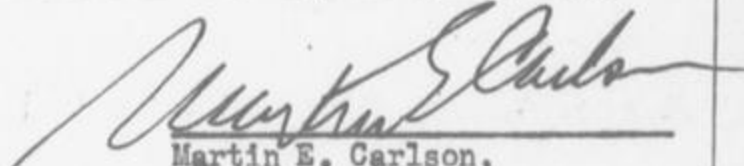
独断専行出来る人ではありま

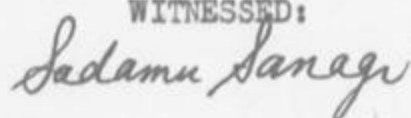
せん

(D) 彼は正義感の強い人であります

香港で日本商人が外國人を擄取
する有様を見て心から日本商人を攻
撃し彼等を反有せし事を屢々
聞いたことがありました

Subscribed and sworn to before me this 26th day of April, 1949.


Martin E. Carlson,
Commander, USNR,
Defense Counsel.

WITNESSED:

Sadamu Sanagi

SANAGI, Sadamu,
Defense Counsel.

1949年4月26日

元第十四師團參謀陸軍大佐
現神奈川県民生部世話課長

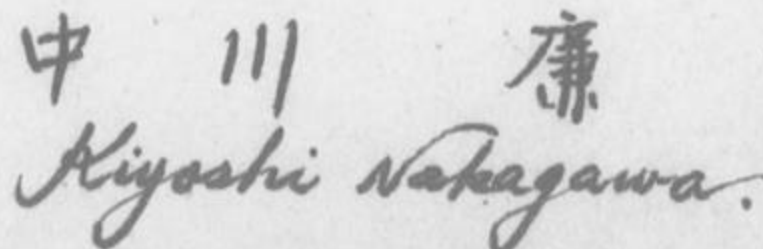
中 川 康

Kiyoshi Nakagawa.

Exhibit 58(4)

0466

PETITION.

CHARACTER EVIDENCE FOR TADA, TOKUCHI, FORMER COLONEL, IJA.

1. I hereby swear that the following testimony is the truth according to my conscience.
2. The period in and circumstances by which I came to know TADA, Tokuchi.
 - A. During May 1939 til February 1940, when he was instructor at the Military College and lecturing on "Philosophy of War," I was then a student.
 - B. From December 1943 to March 1946 when he was Chief of Staff of the Fourteenth Division I was under his command as staff officer of the same unit and was in charge of operations, education and organization.
3. Character evidence.
 - A. He was an idealist with firm convictions.
 - a. He studied "Philosophy of War," at the Imperial University in Tokyo and he insisted that, to attain the way of the God in this world we should not appeal to force. He was a strong advocate of peace and abhorred anything that was contrary to the principles of humanity.
 - b. He endeavoured very hard to persuade people to agree with his contention. He is the author of "The Japanese Theory of Warfare."
 - c. He believed that the only policy which could succeed in controlling the army was to create a feeling of gratitude and affection amongst them. Consequently we who were under his command enjoyed the benefits of this policy.
 - B. He had a strong sense of responsibility.
 - a. In all cases where he had to relay the intention, order or direction of the Commanding General to his subordinates he would always seek the approval of the Commanding General whether important or otherwise. He also exerted his efforts to have the intentions and orders of the Commanding General complied with as fully and perfectly as was possible.
 - b. He studiously endeavoured to ascertain the result of implementation of the intention, order or the direction of the Commanding General.
 - C. He was by nature a person of mild temperament.
 - a. When he drafted certain plans he would seek the advice of various persons and would not feel at ease unless he was confident of its perfection. He might sometimes use strong verbiage yet he was essentially a man of mild temperament.
 - b. He is not the type of person who would artfully manipulate his superior in order to do what ever he liked without permission.
 - D. He was a man with a strong sense of justice.

I have heard on many occasions that one in Hongkong, when he witnessed the exploitation which the Japanese were carrying on at the expense of the foreigners, he at once attacked these Japanese and made them repent of their deplorable conduct.

April 26, 1949.

/s/ Nakagawa, Kiyoshi
NAKAGAWA, Kiyoshi.
Former Colonel, IJA,
Staff Officer 14th Division.
Exhibit 58(a)(1)

Now Chief of Civilian Relief
Agency, Kanagawa Prefecture.

Subscribed and sworn to before me this 26th day of April, 1949.

/s/ Martin E. Carlson

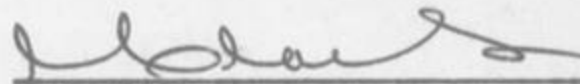
Martin E. Carlson.
Commander USNR,
Defense Counsel.

WITNESSED:

/s/ Sadamu Sanagi

SANAGI, Sadamu,
Defense Counsel.

I hereby certify that the above is a true and correct translation
from the Japanese original to the best of my ability.



E.F. Clark,
Lieutenant (jg) USN
Interpreter.

Exhibit 58(a)(2)

0468

元陸軍大佐多田智知の人格断片

一 多田智知を知れる期間及経緯

多田智知は一九三九年五月私が陸軍大学の学生として入校したとき教官であり爾後参謀本部に於て同時に勤務した。

二 彼は其の著書「日本戦争学」に基き一九三九年の後半期に約二ヶ月に亘り思想に関する講義を行つたが其の骨子は「敵を殺すのは策の中なるものである。敵を生かして使ふのは策の上なるものである。戦局に於てはなるべく多くの俘虜を得て之を正當に取扱ひ味方に引き入れ我が戦力を数倍にせねばならぬ」ことにあつた。之に對し學生山本大尉が時支那戦争我軍の経験から「俘虜は戦局には手足揃ひで手数がかかり且たとへ之を養育することが出来ても多くの日敵を要する。教官の意見は机上論に通きない」と反駁したのに對し彼は憤然として「其の機を考へてはたとへ一時の戦局に勝つたとしても終局の勝利は得られぬ」と説いた。學生は彼の講義を「本領戦術」とか「聖たるを戦術」——註、勝がす理大きくなるといふ意味で

戦争は消滅ではないと言ふ意味——と名付けて居た。彼の思想はクラウゼツァフの機動戰術思想とは此の意味に於て其の趣（目的）を異にしてより遙くまで武力戰に思想戰が先行することを主張してゐたので俘虜獲得論者、俘虜待遇論者であつた。

一九四八年七月二十日

元大本營参謀、陸軍中佐
東京市原市原上本郷二〇五一九番地

小林

岡野

00

Exhibit 59

0470

CHARACTER CERTIFICATE

1. Tokuchi Tada was an instructor at the Staff College when I entered the said college as a student in May 1939, and then I served in the General Staff Office with him.

2. In the latter half of 1939, for two months he gave a lecture on tactical ideas based on his book on "War Science of Japan." The summary of the lecture was as follows:

"Killing the enemy is good tactics, but to put them to good use instead in the best tactic. In battle we should capture as many enemies as possible and by winning them over to our side we can use them to the best advantage."

But Captain Yamamoto (a student) made the following argument against him based upon his own experience at China front.

"In battle, the war prisoners are a heavy burden on us. It would take a long time to win them to our side. Your opinion is nothing but desk theory."

In indignation, Tada made the following comment in reply: "If such is your idea, in the long run you will never be able to win a war."

The student termed his lecture "orthodox chess-tactics", or "snow-ball tactics." (This means that war is not consuming, in other words, the more we fight the more we get.)

His tactical ideas were quite different from those of Clausewitz (an advocate of extermination) in the above sense. He insisted on giving preference to fifth columnist activities preceding armed forces. So to speak, he advocated winning over war prisoners and protecting them.

July 20, 1948.

/s/ Shioji Kobayashi, (seal)
Former Staff of the General
Headquarters, Army Lieutenant
Colonel.
519 Kamikitazawa 2-chome,
Setageya-ku, Tokyo.

I hereby certify the above to be a true and complete translation of the original document in Japanese, to the best of my ability.

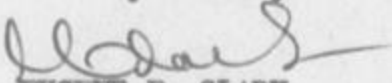

EUGENE F. CLARK,
Lieutenant (jg), USN,
Interpreter.

Exhibit 59 (a)

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