

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

Tokyo, Japan

THE UNITED STATES OF AMERICA, et al

-- VS --

Paper No. 1053

ARAKI, Sadao, et al

-- Defendant --

APPLICATION ON BEHALF OF ITAGAKI, Seishiro,  
FOR AN ORDER FOR THE PRODUCTION OF WITNESSES.

COMES NOW ITAGAKI, Seishiro, and respectfully requests the Tribunal, in accordance with Section III, Article 9 (e) of the Charter, to order the production of the following named witnesses necessary to his defense: -

1. KOKUBU, Shinshichiro

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
Shimchondacho, Kanazawa-shi, Japan
- c. The witness was formerly a staff officer of the Kwantung Army and a staff officer of the 5th Division.
- d. The testimony of this witness will deal with:
  - (1) 5 year plan of development in Manchukuo.
  - (2) Dealings with North China and Mongolia.
  - (3) The movements of the 5th Division and Itagaki's non-connection with the China Incident and Nanking atrocities.

2. FURUNO, Inosuke

- a. The nationality is Japanese;
- b. The address is Tokyo, Japan;
- c. The witness was formerly the President of the Domei News Agency;
- d. The testimony of this witness will deal with:-
  - (1) The cause of the change of Kono Cabinet.
  - (2) His visit to Itagaki in North China to persuade him to become Minister of War.
  - (3) Itagaki's policy regarding China.

3. IMAI, Takeo

- a. The nationality is Japanese;
- b. The address of the witness is:  
Choyomura, Uemizuuchigun, Nagano-ken, Japan.
- c. The witness was formerly a Major General, a staff officer of the China Expeditionary Force.
- d. The testimony of the witness will deal with:
  - (1) The attitude of War Minister, Itagaki, regarding China.
  - (2) The circumstances of planning and attacking Hankow and Canton.
  - (3) Attempts of Itagaki to bring about settlement of China Incident.
  - (4) Strengthening of national mobilization and its relation to the War Minister.

4. WATANABE, Wataru

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
Kamakura machi, Kanagawa-ken, Japan;
- c. The witness was formerly a Major General.
- d. The testimony of the witness will deal with:  
The circumstances of establishment of Koha-in (Asia Development Bureau)

5. IWAKURO, Tsuyoo

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
Denenchofu, Ohtaku, Tokyo, Japan
- c. The witness was formerly a Major General;
- d. The testimony of the witness will deal with:-
  - (1) Strengthening of Anti-Comintern Pact and the attitude of the Army towards it.
  - (2) The circumstances of the fall of the Hiranuma Cabinet.

6. HAYABUCHI, Tsuneharu

- a. The nationality of the witness is Japanese;
- b. The address of the witness is Mieken, Japan;
- c. The witness was formerly a Major General;
- d. The testimony of the witness will deal with:-
  - (1) The Anglo-Japanese negotiations over Tsientsin Incident.
  - (2) Anti-British movement and suppression of same by Itagaki.

7. TATSUMI, Eiichi

- a. The nationality of the witness is Japanese.
- b. The address of the witness is:  
Taisamachi, Shimane-ken, Japan
- c. The witness was formerly a Major General;
- d. The testimony of the witness will deal with:-
  - (1) Tientsin foreign concession incident.
  - (2) The circumstances and development of the negotiation for the strengthening of the Anti-Comintern Pact and its failure;

8. ARAO, Koko

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
c/o Repatriation Bureau, Tokyo, Japan;
- c. The witness was formerly a Colonel;
- d. The testimony of the witness will deal with:-  
The China Expeditionary Army had no connection with the forces went into French Indo-China.

9. TAKEDA, Hisashi

- a. The nationality of the witness is Japanese.
- b. The address of the witness is:  
Inamachi, Nagano-ken, Japan.
- c. The witness was formerly a Lieutenant General;
- d. The testimony of the witness will deal with:-  
The telegrams sent to and from the Central authorities and the Headquarters of Kwantung Army, during the Manchurian Incident.

10. OKADA, Yoshimasa

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
No. 190, Nichome, Umabashi, Suginamiku, Tokyo
- c. The witness was formerly a Colonel;
- d. The testimony of the witness will deal with:-  
The attempts of Itagaki to seek mediation through America for the settlement of the China Incident.

11. HASHIMOTO, Masaichi

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
Kurogetsuso, Atamishi, Shizuoka-ken, Japan;
- c. The witness was formerly a Major General;
- d. The testimony of the witness will deal with:  
Details of the night of the Manchurian Incident.

12. OZAWA, Raizaku

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
Shibasaki, Tachikawa, Tokyo, Japan;
- c. The witness was formerly a member of the  
Concordia Society, Manchukuo;
- d. The testimony of the witness will deal with:  
The foundation and original policy of Kyowakai.

13. IBARA, Junjuro

- a. The nationality of the witness is Japanese;
- b. The address of the witness is Sagashi, Sagaken,  
Japan;
- c. The witness was formerly the Chief of Staff of  
Korean Army;
- d. The testimony of the witness will deal with:  
Treatment of POW in Korea.

14. NOGUCHI, Yuzuru

- a. The nationality of the witness is Japanese;
- b. The address of the witness is Sugamo Prison, Tok
- c. The witness was formerly the Commander of the  
POW Camp in Korea;
- d. The testimony of the witness will deal with:  
Treatment of the POW in Korea.

15. SAITO, Seiei

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
No. 73, Chibadera, Chibashi, Japan;
- c. The witness was formerly the Commander of the  
POW Camp in Malaya.
- d. The testimony of the witness will deal with:  
Treatment of POW in Malaya.

16. TAKAYAMA, Hikoichi

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
Yukigatani machi, Omoriku, Tokyo, Japan;
- c. The witness was formerly a staff officer of  
the Army at North Borneo;
- d. The testimony of the witness will deal with:  
(1) The connection between the 7th Area  
Army and the Army in North Borneo,  
(2) Condition of communication between  
Singapore and North Borneo.

17. HAZEYAMA, Tetsuo

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
Inage, Chibaken, Japan;
- c. The witness was formerly a staff officer of  
the 7th Area Army;

17. HAZEYAMA (Continued)

- d. The testimony of the witness will deal with:
- (1) The relation between the 7th Area Army and other local armies
  - (2) Conditions at Singapore during four months prior to the end of the war.

18. UYESUGI, Genji

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
Fukukashi, Fukuokaken, Japan
- c. The witness was formerly a staff officer of the 7th Area Army;
- d. The testimony of the witness will deal with:  
The treatment of POW in Malaya.

19. OYAMA, Shozo

- a. The nationality of the witness is Japanese;
- b. The address of the witness is:  
c/o Repatriation Bureau, Central District,  
Babacho, Higashiku, Osakashi, Japan;
- c. The witness was formerly a staff officer of the 7th Area Army;
- d. The testimony of the witness will deal with:  
The supply condition of Malaya during the four months prior to the end of war.

20. KUWABARA, Cho

- a. The nationality of the witness is Japanese;
- b. The address of the witness is Azatoda, Tokuyamashi, Yamaguchi, Japan;
- c. The witness was formerly a staff officer of the 7th Area Army.
- d. General conditions of Malaya during the four months prior to the end of the war.

The date upon which the attendance of the witnesses will be required for testifying cannot be stated accurately; but their attendance for consultation with counsel is required forthwith.

ITAGAKI, Seishiro

By

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YAMADA, Honzo

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SASAGAWA, Tomoji

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Floyd J. MATTICE

Dated  
Tokyo, Japan

11 July 1947