

The Special Tribunal of Italian Fascism: The Rise and Fall of a Totalitarianism's Flagship.

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This short essay examines the birth, functioning, and decline of a central organ of the repressive system implemented by the fascist regime to crush all political opposition: the Special Tribunal for the Defense of the State. Dedicated to extreme severity, with limited or no guarantees for the accused, and with single-instance trials based on the wartime penal code, Mussolini's Special Tribunal effectively succeeded, thanks also to the assistance of an efficient and widespread network of political police, in instilling fear and discouraging any organized act of political opposition to fascism. Abolished in August 1943 following the fall of fascism and after 17 years of uninterrupted existence, the Special Tribunal was reconstituted a few months later, but its final months of existence, in an Italy now a theater of war, were ephemeral and left almost no trace.

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Historiography has defined the special courts of 20th-century totalitarian regimes as “puppet courts” or “kangaroo courts”, grouping together the German *Volksgesichtshof*¹, the Italian Special Tribunal for the Defense of the State, Vichy's *Tribunal d'État*², Spain's *Tribunal de Orden Público*³, and the Soviet courts shaped by Vyshinsky (1948). They shared almost no guarantees of defense, rapid proceedings, and the certainty of conviction.

What remains clear is that their repressive role was crucial, despite differences in the composition and character of their members: theatrical figures like the State accuser Vyshinsky in the Soviet Union or *Volksgesichtshof*'s president Roland Freisler⁴ in Germany, more gray and bureaucratic figures in Italy. What was constant was the apparatus of the propaganda trial as a framework for inevitable convictions. The trials of Italian

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¹ About the German *Volksgesichtshof*, see now C. Steur, *Der Volksgesichtshof—Hitlers politisches Tribunal*, Berlin, 2004 (<https://www.gedenkstaettenforum.de/aktivaeten/gedenkstaettenrundbrief/detail/der-volksgesichtshof-hitlers-politisches-tribunal>); M. Stolleis, *The Law Under the Swastika: Studies on Legal History in Nazi Germany*, Chicago, 1998; I. Müller, *Hitler's Justice: The Courts of the Third Reich*, Boston, 1991.

² There are currently no specific studies on the Vichy *Tribunal d'État*. See on this topic V. Sansico, *La justice déshonorée, 1940-1944*, Paris, 1922.

³ Extensive references to the *Tribunal de Orden Publico* can be found in B. De Riquer, Borja, *La dictadura de Franco. Vol. 9 de la Historia de España*, Barcelona, 2010.

⁴ See recently H. Ortner, *Hitler's Executioner: Roland Freisler, President of the Nazi People's Court*, New York, 2018; C. George, *Roland Freisler (1893-1945): An Intellectual Biography*, Cambridge, 2021; wide references about Freisler also in J. Fest, *The Face of the Third Reich; Portraits of the Nazi Leadership*, New York, 1970.

antifascists at the end of the 1920s⁵, those of the German conspirators of July 20, 1944 (Hoffmann, 1996; Kershaw, 2009) and, in Vichy, the “Riom Trial” (Bracher, 2012; Bredin, 2012; Michel, 1979) against members of the defunct Third Republic accused of high treason all received wide publicity.

In Italy, studies on the Special Tribunal for the Defense of the State have multiplied⁶. It was indeed a model. But it was also a chameleonic, protean, and contradictory organ.

The Special Tribunal was established by the Decree No. 2008 of November 25, 1926: one of the “exceptional fascist laws” that marked the death of all freedom and democracy in Italy of the Twenties⁷. This act created the Special Tribunal and reintroduced the death penalty for political crimes less than 40 years after its abolition under the Zanardelli penal Code of 1889. The Special Tribunal would hand down 42 death sentences (31 executed) until its dissolution. In November 1926, Mussolini survived several assassination attempts⁸: thus, a body capable of protecting the figure of the Duce, as well as the members of the royal family, and repressing antifascism with loyal personnel—bypassing what was seen as a lenient ordinary judiciary—seemed the ideal solution.

The Special Tribunal became the flagship of repression. It was feared; it answered directly to Mussolini⁹ and conducted major trials with wide media coverage. It operated according to the provisions of the Italian military penal code of war¹⁰ and handed down extremely harsh sentences against individuals deemed dangerous to the regime. Well known are the trials of leading opponents such as Sandro Pertini, Antonio Gramsci, and the communist group¹¹, as well as the late-1920s trials against Croatian and Slovene separatists and the 1930 trial against the “Giustizia e Libertà” group¹². A relative decrease in cases in the 1930s did not diminish its repressive effectiveness in any way¹³.

⁵ Among many others (including Sandro Pertini and other socialist leaders), the trial of Antonio Gramsci, the leader of the Communist Party of Italy, is well-known. He was tried along with other communist deputies in 1928 and was sentenced to over 20 years in prison. See J.-Y. Frétygné, *Antonio Gramsci: Life of a Revolutionary*, London, 2021.

⁶ See for example, for the last decades, P. Dell’Osa, *Il tribunale speciale e la presidenza di Guido Cristini 1928-1932*, Milan, 2017; M. Franzinelli, *Il tribunale del duce*, Milan, 2017; A. Dal Pont & S. Carolini, *L’Italia dissidente e antifascista. Le Ordinanze, le Sentenze istruttorie e le Sentenze in Camera di consiglio emesse dal Tribunale speciale fascista contro gli imputati di antifascismo dall’anno 1927 al 1943*, Milan, 1980; L. P. D’Alessandro, *Giustizia fascista. Storia del Tribunale speciale (1926-1943)*, Bologna, 2020. On case law of the Special Tribunal see S. Vinci, *The Judicial Policy of Italian Fascism in the Jurisprudence of the Special Tribunal for the Defense of the State (1926-1943)*, in www.historiaetius.eu-10/2016-paper 14, p. 27 (consulted on 07/05/2020); A. Dal Pont, A. Leonetti, P. Maiello, & L. Zocchi, *Aula IV, Tutti i processi del Tribunale speciale fascista*, Rome, 1961.

⁷ As is known, the Special Tribunal was established by Law No. 2008 of 25 November 1926 (Provisions for the Defense of the State), one of the “fascist laws”, and implemented by Royal Decrees No. 2062 of 12 December 1926 and No. 313 of 13 March 1927.

⁸ Author of these attentats were Tito Zaniboni, Violet Gibson, Gino Lucetti, Anteo Zamboni.

⁹ The presidents of the Special Tribunal had distinguished themselves for their diligence and loyalty: from General Caro Sanna (in office from 1926 to 1928) to the much talked about Guido Cristini (1928-1932), up to the very fascist Antonino Tringali Casanuova (1932-1943).

¹⁰ The Italian military penal code of war had been adopted in 1869 and was replaced in 1941.

¹¹ M. Franzinelli, *Il Tribunale del Duce*, op. cit., p. 75. On the trial against the Slovenian separatists, the Special Tribunal had the opportunity to make one of its very rare trips and moved to Trieste to judge them.

¹² On October 30, 1930, 24 members and leaders of the “Giustizia e Libertà” movement in Italy, including Ernesto Rossi and Riccardo Bauer, were arrested and tried by the Special Tribunal; one of them, Ceva, committed suicide in prison; the movement’s leaders were sentenced to very heavy prison terms. The members of “Giustizia e Libertà” were betrayed and handed over to the fascist police by the spy Dino Segre, aka Pitigrilli.

¹³ According to Stefano Vinci, the 1930s also marked a turning point in the repressive policy of the Special Tribunal: “While in the first years of its activity the Special Tribunal had a precise political aim aimed at the annihilation of clandestine organizations and the prevention of attacks on the Duce, from the 1930s onwards it took on a different role, no longer as an active body of repression (always exercised by the OVRA), but as a guarantor of the stability of the regime which would intervene to adequately strike any outbreak of revolt” (S. Vinci, *The Judicial Policy of Italian Fascism in the Jurisprudence of the Special Tribunal for the Defense of the State (1926-1943)*, op. cit., p. 27 (consulted on 07/05/2020).

The Tribunal held its formal hearings in courtroom IV of the criminal court of Rome, inaugurating them on February 1, 1927, at 10 a.m. It was meant to last five years, but its existence was repeatedly extended until the fall of the fascist regime in July 1943. Alberto Acquarone wrote that the Special Tribunal instilled fear in potential opponents, deterring them from action (Acquarone, 1995, p. 103). It was an instrument open to imitation: The Nazi regime would follow its example with the *Volksgerichtshof* as early as 1934 (Klinkhammer, 2010, p. 395).

Its composition, initially entrusted to the Minister of War and later to Mussolini himself, was military. But in any case, the members were men utterly loyal to the Duce, chosen (except for the reporting judge) from the ranks of the fascist militia (MVSN). The militia made up the majority of the Tribunal's members, compared to those from the military or, occasionally, from the ordinary judiciary serving as rapporteurs¹⁴. Of the three presidents in office from 1926 to 1943, the last—Antonino Tringali Casanuova from Livorno—most fully embodied its essence. The procedure was summary; the investigation steered toward guilt. Defendants' guarantees were minimal and defense limited. Pretrial release was not allowed. Trials concluded very quickly. Mimmo Franzinelli wrote that “until a few days before the trial, the defendants did not know what the charges were based on. When they appeared in court, everything had already been decided” (Franzinelli, 2017, pp. 42-45). The Tribunal judged according to the rules of the Military Penal Code of War. Its sentences were not subject to appeal. In total, it issued 978 judgments for political crimes and 404 for common crimes in wartime, trying 5,620 defendants and convicting 4,596, for a total of 27,752 years, five months, and 19 days of sentences¹⁵.

From the war years 1940-1943 onward, things changed¹⁶. The Special Tribunal changed its face and became no longer the well-known political organ, but a polyvalent criminal authority, a “wildcard” court, a factotum. Defeatism became a focus of attention. New laws expanded its competence, now including food-related crimes, currency offenses, murder, robbery, rape, extortion, kidnapping for ransom or extortion—all connected with the

¹⁴ Details on the procedure followed by the Special Tribunal can always be found in M. Franzinelli, *Il Tribunale del Duce*, op. cit., pp. 23-27; see also A. Grilli, *Resistenza e repressione. Il Tribunale Speciale per la Difesa dello Stato nella RSI (1943-1945)*, Rona, 2025, pp. 12.15.

¹⁵ The activity carried out by the Special Tribunal during the 20 years, in terms of trials held and convictions, was considerable: “With its 5,619 people tried, 15,000 assigned to confinement, 150,000 monitored and warned, 42 condemned to death (of which 31 were actually executed), the Special Tribunal represented ‘an efficient device deployed to guard the regime’, which meant that ‘fascism, in order to eliminate its opponents, did not believe it could count on the ordinary judiciary, the assize courts and the normal functioning of the procedural system’” (S. Vinci, *La politica giudiziaria del fascismo italiano*, op. cit., p. 21). See also, first of all, on its case law, A. Dal Pont, A. Leonetti, P. Maiello, & L. Zocchi, *Aula IV., Tutti i processi del Tribunale speciale fascista*, op. cit. above, pp. 32-156; M. Franzinelli, *Il Tribunale del Duce*, op. cit. above.

¹⁶ Indeed, the decree of June 16, 1940, called upon it to punish murder, robbery, rape, extortion, kidnapping for the purpose of robbery or extortion connected with the state of war. The penalties provided were drastic, up to capital punishment. Legislative Decree No. 1386 of December 9, 1941, extending the existence of the Special Tribunal indefinitely, granted it new jurisdiction over crimes covered by the military penal codes of peacetime and wartime enacted in 1941: treason, espionage, fraud, and failure to comply with military supplies, subversive association, and subversive or anti-national propaganda committed by military personnel. Finally, Laws No. 589 of June 11, 1942, and No. 1549 of December 3, 1942, authorized it to punish serious food and food-related crimes (minor ones remained within the jurisdiction of ordinary justice). The Special Tribunal could have decreed death for anyone who diverted or hoarded large quantities of food. But this was merely a reflection of the deprivation, hardship, the specter of hunger, and the burgeoning black market to which the war had condemned people. The Special Tribunal had thus donned new clothes without abandoning its old ones, despite having become a multipurpose body. To ignore this fact is to write a partial and incomplete story.

“state of war”.¹⁷ Until its dissolution on July 29, 1943¹⁸, the Special Tribunal judged everything: political crimes, crimes against the state in a broad sense, economic and financial crimes, and serious ordinary crimes. Everything of significance that occurred in wartime Italy fell under its scrutiny: a robbery or murder committed during a blackout, fraud against the state, espionage, the posting of clandestine leaflets, satire, or jokes about the regime, and more. It was no longer the “pure” repressive organ of antifascism, but an all-purpose criminal court. Yet, it was now also expected from it to reason like a criminal court, to change its *modus operandi* and become a technical-legal body. Thus, from 1940 onward, ordinary judges were added to the Special Tribunal to instill in its members a jurist’s mindset.

By the time of its dissolution on July 29, 1943, following the fall of the fascist regime in Italy, the Special Tribunal had become a protean, indefinable body. On August 9, 1943, Enrico Capotorti, a judge of the Court of Cassation and former member of the Special Tribunal, reflected in its memorandum called “Special Revolutionary Tribunal and Special Tribunal for the Defense of the State”, dated 9 August 1943¹⁹, on the survival for 17 years of an institution constantly assigned new functions, yet without a stable structure or framework²⁰. The Tribunal had been meant to last only five years, yet it endured for two decades. It was supposed to protect the fascist regime, yet it also became the guardian of the state²¹; with the Penal Code of 1930, it had to judge crimes against the personality of the state, contained in Book II, Title I²², and here it underwent its first transformation: from organ of the regime to a super-state court. A hybrid body,

called upon to protect both state and party, to judge indiscriminately the insult to the flag, the offense against the Head of State, espionage, or a bawdy joke about the Duce, a careless word against the regime, or a defacement of fascist symbols.²³

¹⁷ Food restrictions also increased rapidly: on May 6, 1940, a law was passed rationing food and introducing a ration card. On December 1, 1940, a ration card was introduced for pasta, wheat flour, and rice (allowing a total of two kilograms per person per month). In February 1941, individual rations were modified, varying region by region. In Emilia, the card allowed 600 grams of pasta, one kilogram of rice, and 400 grams of wheat flour per person per month. On October 1, 1941, bread was rationed to 200 grams per person. In March 1942, the bread portion was reduced to 150 grams for adults, with 200 grams reserved only for young people aged 9 to 18. Starvation was now widespread, affecting millions of Italians. Everything was regulated: the sale of potatoes, eggs, milk, cheese, and legumes. The reservation and sales system already adopted for meat was chosen for milk and the goods were distributed as and when they arrived. Due to low production and the ban on imports from other provinces, the milk quota in Bologna in January 1942 was set at one deciliter on Thursdays and Sundays and one and a half deciliters on other days (from https://guerrainfame.it/rzionamento_e_tesseramento, consulted 08/05/2020).

¹⁸ The end of the Fascist regime following the military defeat in World War II occurred on July 25, 1943, and marked the rapid dissolution of all the regime’s bodies and institutions. This included also the Special Tribunal for the Defense of the State.

¹⁹ State Archive of Rome (SAR), archival fond of the Italian Ministry of Justice [RSI, MG, cabinet, Envelope 4, N. 225]. Memorandum entitled: “Special Revolutionary Tribunal and Special Tribunal for the Defense of the State”, 9th August 1943.

²⁰ Memorandum of Capotorti, op. cit., p. 2.

²¹ Article 1 of Law No. 2008 of 25 November 1926, “Provisions for the Defense of the State”, establishing the Special Tribunal, provide: indeed: “Whoever commits an act directed against the life, integrity, or personal freedom of the King or the Regent shall be punished by death. The same penalty applies if the act is directed against the life, integrity, or personal freedom of the Queen, the Crown Prince, or the Head of Government”. Furthermore, Article 2 authorized the Tribunal to also punish with death “the crimes provided for in Articles 104, 107, 108, 120, and 252 of the Criminal Code” (i.e., the so-called Zanardelli Criminal Code of 1890, still in force at the time). This was a very—and sadly—important turning point, as the death penalty was reintroduced in Italy, almost 40 years after its abolition.

²² Crimes against the personality of the State are included in Articles 241 to 313 of the Criminal Code of 1930 and include a wide variety of crimes against state structures and symbols (attacks against the integrity, independence, and unity of the State, aiding and abetting war, destruction or sabotage of military installations, Zionist activities, political defeatism, subversive associations, acts of terrorism, civil war, armed insurrection against the powers of the State, devastation, looting, and massacre, vilification of the Italian nation, attacks on foreign heads of state, etc.).

²³ Memorandum of Capotorti, op. cit., p. 2.

Thus began the second phase of its existence: Repression now concerned the security of the entire state structure. For Capotorti, all this would imply “normalization”, integration into the judicial system and changes in its composition. But this did not happen. The contradiction of a party tribunal persisted, “entrusted, alongside the protection of residual factional interests, with the far nobler and more enduring task of safeguarding the personality of the Italian state”.²⁴ The war transformed it once again; yet—Capotorti wrote—“trials concerning currency or rationing, or cases of corruption or robbery, may raise subtle and difficult legal issues”,²⁵ while the Tribunal continued to be staffed by men of the fascist militia with often a modest legal background²⁶.

The history of the Special Tribunal did not end in the summer of 1943. It had an appendix. In September 1943, Mussolini formed a collaborationist government in northern Italy under German protection—it was the so-called Italian Social Republic²⁷—and decided to resurrect the Special Tribunal. Mussolini wanted it, as so did his Minister of Justice Piero Pisenti²⁸, eager to give a veneer of legality to the Italian Social Republic and to use the Tribunal as if it were a resurrected “fascist justice” in place of the pure summary justice against the armed Resistance, in the framework of what was called a civil war²⁹ between fascism and antifascism, raging in Italy from October 1943 to April 1945 in parallel with the ongoing hostilities between the Germans and the Anglo-American Allies. Thus, the resurrected Special Tribunal for the defense of the State was officially reconstituted the 3rd December 1943³⁰ and would live its third (or fourth) life—the last one. However, it would no longer be based in Rome, as in the past, since Rome was now too close to the front line and was now considered a “war

²⁴ Ibid, p. 2.

²⁵ Ibid, p. 4.

²⁶ Ibid, p. 5.

²⁷ On the origin of the Italian Social Republic (RSI) see first W. F. Deakin, *The Brutal Friendship: Mussolini, Hitler and the Fall of Italian Fascism*, London, 1962. This standard work has been its first edition in Italian one year later: W. F. Deakin, *Storia della Repubblica di Salò*, Turin, 1963. See also A. Lepre, *La storia della Repubblica di Mussolini. Salò: Il tempo dell'odio e della violenza*, Milano, 1999; G. Bocca, *La Repubblica di Mussolini*, Milano, 1997.

²⁸ Piero Pisenti (1887-1980), born in Perugia but Friulian by adoption, joined Benito Mussolini's fascist party in 1921. He also joined the PNF in 1921 and established himself as the leader of the Friulian squadristi. Secretary of the Udine Fascist Party from 1922 to 1923, he was also its federal secretary (1922-1924), high political commissioner of fascism (1923), general superintendent for war debts, director of the *Giornale del Friuli* (1923-1925) and president of the Udine section of the Institute of Fascist Culture. First elected to parliament in 1924 and re-elected until 1939—when the Chamber of Deputies was transformed into the Chamber of Fasci and Corporations, of which Pisenti was a member until 1943—over the years he became one of the most loyal members of the “Duce's” hierarchy. In the 1930s, he was, among other roles, president of the Fascist Lawyers' Union and rapporteur on the commission for the reform of the Italian Civil Code. After the fall of Fascism on July 25, 1943, he immediately joined the Italian Social Republic, becoming its Minister of Justice on November 4, 1943. A staunch Fascist, but a man of the law and with legalistic sentiments, he opposed reprisals and partisan vengeance during the anti-partisan struggle, seeking to assert a concept of “legality” (albeit very difficult to implement) in those cruel times, when the civil war in Italy was intertwined with the ongoing war between the Germans and the Allied forces. He was particularly opposed to the death sentence, in the so-called “Verona Trial” of January 1944, of those who, considered “traitors” by hardline fascists, had voted against Mussolini in the session of the Grand Council of Fascism on July 24, 1943, leading to his ouster from power. His belated desire to reconstitute the Fascist Special Tribunal fits precisely into this “legalitarian” perspective. After the end of the war, having escaped execution by partisan forces, he was acquitted of all charges and was released in 1946. On Pisenti, see G. Parlato, “Pisenti Piero”, in *Dizionario biografico degli italiani*, Vol. 84, Rome, 2015. See also “Pisenti Piero”, in *Dizionario biografico dei Friuliani* (<https://www.dizionariobiograficoiefriulani.it/pisenti-piero>). See most recently A. Grilli, *Una legalità impossibile. RSI, giustizia e guerra civile (1943-1945)*, Rome, 2018, pp. 63-92.

²⁹ The term “civil war” entered the historiography as it was coined, very appropriately, by Claudio Pavone in his work *Una guerra civile. Saggio storico sulla moralità nella Resistenza*, Rome, 1991 (It is well known that Pavone analyzed the Italian anti-fascist Resistance by interpreting it as a triple war: of “national liberation” or “patriotic” against the German invaders, a “civil” war between fascist and anti-fascist Italians, and a “class war” between revolutionary elements in The Resistance—essentially, the communists—and the so-called bourgeois classes).

³⁰ The Special Tribunal was reestablished by the Legislative Decree of the “Duce” No. 794 of 3 December 1943. It would operate between 1943 and 1945 through different sections—contrary to what had happened in the past 20 years—, each of them depending on the development of war events: Those sections were Mantua, Padua, Milan, Venice, Turin, Parma.

zone” by the occupying Germans. Like the other institutions and ministries of the Italian Social Republic, that were forced to regretfully renounce Rome as their natural seat, the Special Tribunal had to choose its headquarters in a city in northern Italy³¹. The city of Mantua was discarded, which could have been strategically suitable, but which did not offer sufficient and suitable premises for the staff of the special tribunal (a large German garrison occupied a large part of it), nor a prison where the defendants could be kept while awaiting trial. Thus, Parma was chosen (December 1943). Subsequently, due to the changed war context following the liberation of Rome (4 June 1944), the Special Tribunal decided to move further north to Bergamo³², where it would remain until the end of the war and its definitive dissolution, at the end of April 1945.

Beset as it was by countless difficulties and squeezed between Italian military justice, German war tribunals, ongoing warfare, summary justice, and reprisals, the Special Tribunal would never regain its former leading role.

Moreover, finding still-loyal personnel was to reveal a very hard challenge for the reconstituted Special Tribunal and its President Mario Griffini³³: Many former members of the Special Tribunal from 1926 to 1943 no longer wanted to serve for fear of reprisals and revenge after the war, and many sincere fascists, fearing a final defeat for the Third Reich, no longer wanted to expose themselves. For this reason, Griffini would base his selections almost exclusively on fascist lawyers still loyal to Mussolini and who simultaneously held ranks in the Militia: They were now the only category of people who could combine loyalty to the fascist cause with an indispensable knowledge of the law (Grilli, 2025, pp. 33-53).

As far as the Special Tribunal daily activity is concerned, it is true that the figures show death sentences in a year and a half equal to those issued in the previous sixteen years (Grilli, 2025, pp. 241-254)³⁴, and that there were high-profile, widely publicized trials—those against the Piedmontese Resistance led by General Giuseppe Perotti and Colonel Guido Rampini³⁵, or against Admirals Campioni and Mascherpa, whose garrisons in Rhodos and Leros bravely resisted the Germans in the autumn of 1943³⁶. But the context had changed: The imminent military defeat prompted reflection on one’s own fate and sometimes more lenient judgments in order to secure to the Special Tribunal members a future claim to innocence in front of the victorious Allies (as happened in the trial of Fernanda Wittgens, the director of the Brera art academy accused of complicity in facilitating the escape of Jewish families from Italy: She risked the death penalty, but was sentenced to a modest prison term³⁷).

Thus, even before the guns fell silent on the Italian front in April 1945, the star of the Special Tribunal for the Defense of the State had set forever.

³¹ On the painful renunciation of Rome as the seat of government of the RSI—a renunciation caused by the opposition of the German ally, who asserted strategic reasons, without however concealing the desire not to have obstacles in the territory directly controlled by it—see M. Borghi Marco Borghi, *Tra fascio littorio e senso dello Stato. Funzionari, apparati, ministeri nella Repubblica sociale italiana (1943-1945)*—2001, Padua, 2021, pp. 21-27.

³² The transfer of the Special Tribunal from Parma to Bergamo, while not having to cover an excessive distance, would represent a significant logistical effort, fraught with obstacles (the Allied air force dominated the skies, and movements—by truck rather than by rail—were preferably carried out at night) and mix-ups. See in this regard A. Grilli, *Resistenza e repressione*, op. cit., pp. 29-33.

³³ Mario Griffini had been as a general of the fascist Militia the former vice-president of the Speciale Tribunal between 1936 and 1943.

³⁴ The Special Tribunal pronounced around 40 death sentences, many of them not executed.

³⁵ On the trials against Perotti and Rampini, high ranking officers who led the Resistance in Piedmont, see A. Grilli, *Resistenza e repressione*, op. cit., pp. 198-199.

³⁶ On the so-called “trial of the admirals”, which caused a great sensation in Italy, see A- Grilli, *Resistenza e repressione*, op. cit., pp. 131-169.

³⁷ The trial of Fernanda Wittgens took place between July and August 1944: see A. Grilli, *Resistenza e repressione*, op. cit., pp. 206-209.

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