

1            "Q.    I notice throughout the island quite a few  
2 barracks to house the army and navy; when were they  
3 constructed?

4            "A.    After December 1941.

5            "Q.    How many Japanese troops were here before  
6 December 1941?

7            "A.    A great number of Japanese personnel were  
8 here on the island, and they had some barracks here at  
9 that time also, most were built after December 1941.

10           "Q.    Do you know of any installations built on  
11 any islands in the immediate vicinity of Moon?

12           "A.    Yes."  
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1 THE PRESIDENT: Admitted on the usual terms.

2 CLERK OF THE COURT; Prosecution's document  
3 No. 6013 will receive exhibit No. 894.

4 (Whereupon, the document above  
5 mentioned was marked prosecution's  
6 exhibit No. 894 and received in evidence.)

7 THE PRESIDENT: Mr. Brannon.

8 MR. BRANNON: Document No. 6013 contains  
9 the name on the first page of the alleged affiant  
10 as M-i-l-o. I point out this discrepancy because of  
11 the nature of this evidence, and I also wish to call  
12 to the Court's attention that in this document, which  
13 is called an affidavit -- I withdraw that last  
14 statement. I omitted a paragraph in the reading here.  
15 I offer no objection to this, but wish to call it to  
16 the Tribunal's attention as an obvious discrepancy.

17 THE PRESIDENT: Probably M-i-l-o is  
18 phonetic.

19 BRIGADIER QUILLIAM: Mr. President, looking  
20 at the original, which is a typed document, apparent-  
21 ly the deponent knew better how to spell his name  
22 than the person who did the typing. Although in the  
23 first instance it is spelled as M-i-l-o, it is also  
24 typed after the actual signature and there it is plain  
25



1 from the original that "a" has been inserted be-  
2 tween "M" and "i," a correction made necessary by  
3 their seeing how he wrote his own name.  
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1 "Q. State what you know of your own knowledge  
2 about those installations.

3 "A. On the island of Mor during 1940 a con-  
4 crete reinforced dock was built. Two gun emplace-  
5 ments were constructed and guns installed thereon,  
6 appearing to be about three inches in diameter. Also  
7 buildings were built for the men and one searchlight  
8 was installed there. Telephone communication was in-  
9 stalled between that island and Mo n. The island has  
10 flat terrain and in one section a lookout tower was  
11 built.

12 "Q. Were there any other installations built  
13 on this island?

14 "A. No.

15 "Q. On what other islands you know of install-  
16 ations being placed?

17 "A. On the island of Pisomeu during 1940.  
18 The exact construction was made there as took place  
19 on Mor."

20 I offer in evidence I.P.S. Document No. 6001,  
21 being the deposition of Joseb Uerbelau.

22 THE PRESIDENT: Admitted on the usual terms.

23 CLERK OF THE COURT: Prosecution's docu-  
24 ment No. 6001 will receive exhibit No. 895.

25 (Whereupon, the document above men-



1           tioned was marked prosecution's exhibit No. 895  
2           and received in evidence).

3           BRIGADIER QUILLIAM:

4           I will now read an excerpt:

5           "Dated: 26 February 1946

6           "1. Q. What is your name?

7           A. JOSEB UTRBELAU

8           "2. Q. What is your date of birth?

9           A. 1908, I do not know the day.

10          "3. Q. Where were you born?

11          A. NGERBECHED, KOROR ISLAND, PALAU...

12          "4. Q. What is your present home address?

13          A. NGEREMID, KOROR ISLAND, PALAU.

14          "5. Q. What is your occupation?

15          A. I am the native Chief of Police for mil-  
16          itary government on KOROR ISLAND.

17          "9. Q. Do you know of construction of forti-  
18          fications or military installations prior to Dec-  
19          ember, 1941?

20          A. Yes.

21          "10. Q. Do you know the type of installation,  
22          the place of construction, and the date concerned?

23          A. I know of a gun emplacement constructed  
24          at NGERENLENGUI, BABELTHUAP, in 1939.

25          "11. Q. Did you witness this construction?



.....

1 A. Yes.

2 "12.Q. Did you work on it?

3 A. No.

4 "13.Q. Did you see the gun in the finished  
5 emplacement?

6 A. No, the area was restricted by the Jap-  
7 anese after its completion.

8 "14.Q. Was forced native labor used on the gun  
9 emplacement on BABELTHUAP?

10 A. Yes.

11 "15.Q. How do you know this was a gun emplace-  
12 ment?

13 A. I saw the gun being brought from a  
14 boat at NGEREMLENGUI Harbor to the area of the gun  
15 emplacement.

16 "16.Q. Do you have knowledge of construction  
17 work before 1941 other than that mentioned?

18 A. No.

19 .....

20 "50.Q. Do you have knowledge of other incidents  
21 of forced native labor and if so relate same?

22 A. The gun emplacement at NGREMDIU, URU-  
23 ITHAPEL was constructed with forced native labor.

24 "51.Q. When did this take place?

25 A. In February, 1941.



1           "52.Q. Previously you said the construction  
2 of the gun emplacement on BABFLTHUAP was the only  
3 fortification or military installation that you your-  
4 self knew was built before December, 1941. Is the  
5 date February 1941, correct?

6           A. Yes, it is correct. When I answered  
7 before I did not know what you meant.

8           "53.Q. Did you work there?

9           A. Yes."  
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1 "54. Q Who ordered you to work there?

2 A The PALAUAN Government, a branch  
3 of an subordinate organization of the South  
4 Seas Government.

5 "55. Q What are the inclusive dates of this  
6 period of labor?

7 A February 1941 to July 1941.

8 "65. Q Did you see them place the gun in  
9 the emplacement you worked on?

10 A Yes, I saw them and helped the Navy  
11 Gonzokus put the gun in place. The gun moved  
12 around and up and down while I sat on it.

13 I offer in evidence I.P.S. document No.  
14 6002, being the deposition of AUKST RIUMD.

15 THE PRESIDENT: Admitted on the usual terms.

16 CLERK OF THE COURT: Prosecution's document  
17 No. 6002 will receive exhibit No. 896.

18 (Whereupon, the document above  
19 mentioned was marked prosecution's exhibit  
20 No. 896 and received in evidence.)

21 BRIGADIER QUILLIAM: I will read an excerpt:

22 "1. Q What is your name?

23 A Aukst Riumd.

24 "2. Q What is your date of birth?

25 A March 24, 1913.



1 "3. Q Where were you born?

2 A At MELEKEIOK village on BABELTHUAP  
3 Island.

4 "4. Q What is your present home address?

5 A NGEREMID Village, KOROR Island, Palau.

6 "5. Q What is your present occupation?

7 A I am a native policeman for Military  
8 Government on KOROR Island.

9 "9. Q Do you know of the construction of  
10 fortifications or military installations by the  
11 JAPANESE prior to December, 1941?

12 A Yes.

13 "10. Q Do you know the type of installation,  
14 the place of construction, and the date concerned?

15 A I know of a gun emplacement constructed  
16 at OIGUL Village, BABELTHUAP, in 1939.

17 "11. Q Did you work on it?

18 A No, I did not work on the emplacement.  
19 I was a supervisor of native labor called in to do  
20 the manual labor. The natives were ordered to do  
21 the work.

22 "12. Q Who ordered this work?

23 A A vice-admiral of the JAPANESE Navy,  
24 not Admiral ITO.

25 "13. Q Was this a written order?



1           A Yes, the written order was brought to  
2 the village chief by a navy man and the chief in  
3 turn ordered the natives to work.

4           "14. Q Did this order state there would be  
5 punishment for those who did not comply with it?

6           A Yes, the order said the gun emplace-  
7 ment was to be finished by a certain date and we  
8 want so many natives. Those failing to report  
9 will be punished.

10          "15. Q Did you see this order?

11          A Yes, the village chief showed the  
12 order to me.

13          "16. Q Do you have the order?

14          A No, the Navy man took it away with  
15 him after the chief and I had seen it.

16          "17. Q Can you describe the vice-admiral  
17 who issued this order?

18          A I cannot describe him. I know that  
19 he left these islands in 1939.

20          "18. Q Did you supervise the entire construction  
21 of this gun emplacement?

22          A No, I supervised the natives who  
23 carried boxes to the gun emplacement.

24          "19. Q Did forced native labor build the gun  
25 emplacement?



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A No, the Navy Gonzokus built it.

"20. Q Did you see the contents of any  
of the boxes the natives carried to the gun  
emplacement?



1 "A. No, I did not see the contents. The  
2 natives carried the supplies to the site of the gun  
3 emplacement which had not been built at that time.

4 "21. Q. Did you see the completed gun em-  
5 placement?

6 "A. Yes, but the gun was not in it yet.

7 "22. Q. Do you remember what date this was?

8 "A. No, only that it was 1939.

9 "23. Q. Did you see the gun placed in this  
10 fortification?

11 "A. No, I did not see a gun placed there  
12 but later in March 1944, I saw a gun there.

13 .....  
14

15 "36. Q. Besides the above mentioned gun em-  
16 placement, do you know of other fortifications  
17 constructed prior to December 1941?

18 "A. Yes, I worked on the PELELIU Air-  
19 field from January 1936 to March 1936.

20 "37. Q. Were you forced to do this work?

21 "A. Yes, I was ordered by the South Seas  
22 Government Officer, KAJISHIMA, to take the place of  
23 a man who became sick.

24 "38. Q. Was this a written order?

25 "A. Yes.

"39. Q. Do you still have this order?



1 "A. No, I returned it when I reported  
2 for work.

3 "40. Q. What did the order say?

4 "A. It read, 'On (date) you, RIUMD, report  
5 and bring this order to the South Seas Government  
6 Officer, KAJISHIMA. If you fail to do so, you will  
7 be punished.

8 "41. Q. Can you describe this man KAJISHIMA?

9 "A. He was a civilian who worked for the  
10 South Seas Government.

11 "42. Q. What type of work did you do during  
12 this period?

13 "A. I carried stones and dug holes to  
14 place the dynamite in.

15 .....  
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17 "48. Q. Were there any airplanes in the area  
18 at that time?

19 "A. No, the airfield wasn't finished.

20 "49. Q. Were there any gun or fortifications  
21 around this area?

22 "A. No.

23 "51. Q. Besides the above mentioned informa-  
24 tion, do you know of any other fortifications or mili-  
25 tary installations constructed prior to December,  
1941?



1           "A. I have heard of others but these  
2 were the only ones I worked on."

3           I offer in evidence I.P.S. Document No. 6012,  
4 being the deposition of ICHIRO MOSES.

5           THE PRESIDENT: Admitted on the usual terms.

6           CLERK OF THE COURT: Prosecution's document  
7 No. 6012 will receive exhibit No. 897.

8           (Whereupon, the document above mentioned  
9 was marked Prosecution's Exhibit No. 897 and  
10 received in evidence.)

11          I will now read an excerpt from the deposition:

12          "Taken at: Moen Island, Truk and Central  
13 Carolines.

14          "Date:           February 23, 1946.

15          "Q. State your name, permanent home address,  
16 and occupation.

17          "A. Ichiro Moses, assistant chief, Uman Island.

18          "Q. How long have you lived on the island of  
19 Uman?

20          "A. Forty-five years.

21          "Q. How long have you been living in the Truk  
22 Atoll?

23          "A. Forty-five years.

24          "Q. Have you any knowledge of fortifications  
25 or military installations constructed by the Japan-



1       ese on Uman Island prior to December 1941?

2               "A. Yes.

3               "Q. State what you know of your own know-  
4 ledge about the installations.

5               "A. In 1939 on the southern section of  
6 Uman Island the Japanese commenced building roads and  
7 fortifications. Houses were built to billet troops,  
8 a searchlight was installed, emplacements for big  
9 guns built, and two big guns and four small ones,  
10 installed. They dug a cave, reinforced it with con-  
11 crete, and stored ammunition therein. This construc-  
12 tion was under the direction of the navy. The officer  
13 in charge of the troops billeted there was Taicho.  
14 Second in command was Buntaisi. During 1940, prior  
15 to December of that year, on the island of Otto,  
16 eight miles south of Uman, the Japanese Navy erected  
17 a wharf, houses, installed a searchlight, two guns  
18 with bores of about two or three inches in diameter,  
19 and several machine guns were installed. During  
20 1941, prior to December of that year, on the island  
21 of Salat, eight miles east of Uman, the Japanese  
22 Navy constructed a wharf, houses, installed a search-  
23 light, two guns with bores appearing to be about  
24 three inches in diameter, and erected a radio station.  
25

.....



1 "Q. Were all the guns in the southern part  
2 of Uman installed in 1939, 1940, and prior to December  
3 1941?

4 "A. Yes.

5 "Q. In the construction of the buildings  
6 what material did they use?

7 "A. For the buildings they used concrete  
8 foundation and the rest was lumber. The cave was  
9 concrete reinforced and all emplacements were con-  
10 crete based.

11 "Q. How many caves did they build before  
12 the war?

13 "A. Only one.

14 "Q. Did you see ammunition stored in the  
15 cave before the war?

16 "A. Yes.

17 "Q. Did they have a great quantity of am-  
18 munition there?

19 "A. Yes.

20 "Q. What was the size of the cave?

21 "A. Twenty-four feet long, twelve feet  
22 wide, and nine feet high, and this cave was full of  
23 ammunition and provisions, mostly ammunition.

24 "Q. Before December 1941 did the Japan-  
25 ese ever practice shooting their big guns?



1 "A. Only to test them.

2 "Q. Was the searchlight built into a  
3 cave?

4 "A. It was built on a platform and covered  
5 over with canvas.

6 "Q. Did they have any other equipment  
7 close to the searchlight?

8 "A. They had a range finder.

9 "Q. On the Island of Otta what did they  
10 have there beside guns and searchlights?

11 "A. They had a warehouse there in which  
12 they kept ammunition and provisions.

13 "Q. Did you see the provisions and ammuni-  
14 tions?

15 "A. Yes.

16 "Q. What did they have on the island of  
17 Salat beside the searchlight and guns?

18

19

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1 "A. A warehouse for ammunition and provisions.

2 "Q. Was all this construction on Otta and Salat  
3 prior to December 1941?

4 "A. Yes.

5 "Q. During 1939, 1940, and 1941, prior to the  
6 war, did the Japanese ever mention waging a war  
7 against the United States?

8 "A. Yes.

9 "Q. What did they say?

10 "A. We are going to install fortifications and  
11 military installations before we start the war a-  
12 gainst the United States.

13 "Q. Did you have to furnish help for the con-  
14 struction on the island of Otta?

15 "A. We were forced to furnish thirty men during  
16 1939 for the construction on Otta for approximately  
17 five months. These men were paid eighty sen per day.

18 "Q. Did you have to furnish help for the con-  
19 struction on the island of Salat?

20 "A. We were forced to furnish thirty men per  
21 day for construction of installation on the island of  
22 Salat for approximately six months. The men re-  
23 ceived eighty sen per day."

24 I offer in evidence I.P.S. Document No.  
25 6014, being the deposition of Sona Monukit.



1 THE PRESIDENT: Admitted on the usual terms.

2 CLERK OF THE COURT: Prosecution's Document  
3 No. 6014 will receive exhibit No. 898.

4 (Whereupon, the document above men-  
5 tioned was marked prosecution's exhibit No. 898  
6 and received in evidence.)

7 BRIGADIER QUILLIAM: I will now read an  
8 excerpt:

9 "Taken at: Moen Island, Truk and Central Car-  
10 olinas.

11 "Date: February 25, 1946.

12 "Q. State your name, permanent home address,  
13 and occupation.

14 "A. Sona Monukit, assistant chief, Tol Island.

15 "Q. How long have you lived on the island of  
16 Tol?

17 "A. Forty-eight years.

18 "Q. How long have you been living in the Truk  
19 Atoll?

20 "A. Forty-eight years.

21 "Q. Have you any knowledge of fortifications  
22 or military installations constructed by the Japanese  
23 on the island of Tol prior to December 1941?

24 "A. Yes.

25 "Q. State what you know of your own knowledge



1 about these installations.

2 "A. During 1939 on the southwest section of  
3 South Tol a road was built from the dock to the top  
4 of the hill. Around the edges of the top of the hill  
5 three gun emplacements were installed and three guns  
6 appearing to be about eight inches in diameter in-  
7 stalled there. A platform was erected and a search-  
8 light affixed thereon. A reinforced concrete cave  
9 in which ammunition was stored was dug in the side of  
10 the hill. Two barracks were built for the Japanese  
11 soldiers. During 1940 on the northern tip of North  
12 Tol a concrete wharf was constructed and a road from  
13 the wharf to the top of the mountain. At the top of  
14 the mountain one barrack and two warehouses were  
15 built. A concrete platform was built and a search-  
16 light placed thereon. Two gun emplacements were con-  
17 structed and guns installed appearing to be about  
18 four or five inches in diameter and a radio station  
19 built."

20  
21 I offer in evidence I.P.S. Document No. 6015,  
22 being the deposition of ATER ERA.

23 THE PRESIDENT: Admitted on the usual terms.

24 CLERK OF THE COURT: Prosecution's docu-  
25 ment No. 6014 will receive exhibit No. 899.

(Whereupon, the document above men-



1           tioned was marked prosecution's exhibit No. 899  
2           and received in evidence).

3           BRIGADIER QUILLIAM: I will now read an  
4           excerpt from ATER ERA's deposition.

5           "Taken at: Moen Island, Truk and Central  
6           Carolines.

7           "Date: February 25, 1946.

8           "Q. State your name, permanent home address,  
9           and occupation.

10          "A. Ater Era, chief, Fefan Island.

11          "Q. How long have you lived on the island of  
12          Fefan?

13          "A. Forty-nine years.

14          "Q. How long have you been living in the Truk  
15          Atoll?

16          "A. Forty-nine years.

17          "Q. Have you any knowledge of fortifications  
18          or military installations constructed by the Japanese  
19          on Fefan Island prior to December 1941?

20          "A. Yes.  
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1           "Q State what you know of your own knowledge  
2 about the installations.

3           "A On the island of Fefen during the year of  
4 1940 the Japanese constructed a road from the dock  
5 on the east side of the island to the top of the  
6 mountain. Emplacements for two guns were built and  
7 guns appearing to have bores of about five inches  
8 were installed. A searchlight was placed there on a  
9 platform and a generator placed inside a small build-  
10 ing. Three large buildings were erected, one used as  
11 a barracks and two for warehouses.

12           "Q Do you know the names of any of the persons  
13 in command or in charge while the building was going  
14 on prior to December 1941?

15           "A Iwai, Japanese Navy, was one of the officers  
16 in charge during that period."

17           I offer in evidence I.P.S. Document No.  
18 6016, being the deposition of MICHUO NACHUO.

19           THE PRESIDENT: Admitted on the usual terms.

20           CLERK OF THE COURT: Prosecution's document  
21 No. 6016 will receive exhibit No. 900.

22           (Whereupon, the document above  
23 mentioned was marked prosecution's exhibit  
24 No. 900 and received in evidence.)

25           BRIGADIER QUINN: I will now read an



1 excerpt from the deposition.

2 "Taken at: Moen Island, Truk and Central Carolines.

3 "Date: February 25, 1946.

4 "Q. State your name, permanent home address, and  
5 occupation?

6 "A. Michuo Nachuo, chief, Dublon Island.

7 "Q. How long have you lived on the island of  
8 Dublon?

9 "A. About twenty-five years.

10 "Q. How long have you been living in the Truk  
11 Atoll?

12 "A. Twenty-five years.

13 "Q. Have you any knowledge of fortifications or  
14 military installations constructed by the Japanese  
15 on this island prior to December 1941?

16 "A. Yes.

17 "Q. State what you know of your own knowledge  
18 about the installations.

19 "A. About the middle of 1941 on the island of  
20 Dublon on the east side on top of a hill the  
21 Japanese commenced construction. They built two  
22 barracks, two warehouses, and one radar station.  
23 Concrete emplacements were set and three guns,  
24 appearing to be six-inch guns, were installed there.  
25 A platform was erected and a searchlight placed there.



1 "On the south side of Dublon a fuel dump was  
2 established. Close to the fuel dump one large  
3 cave was dug and concrete reinforced.

4 "This was used to store ammunition and pro-



1       visions. No other fortifications or military instal-  
2       lations were erected prior to December 1941.

3                "Q Do you recall any other installations estab-  
4       lished before December 1941?

5                "A A lookout tower was built before December 1941  
6       and wireless communication established with Japan.

7                "Q Do you know of any military installations  
8       and fortifications constructed before December 1941  
9       on other islands thereabout?

10               "A Yes.

11               "Q What island?

12               "A Eton.

13               "Q What was built there?

14               "A During 1937 on the island of Eton the Japan-  
15       ese built an airfield. A platform was erected and a  
16       searchlight placed there. A concrete emplacement for  
17       one large gun was constructed and a gun about five  
18       inches in diameter was placed thereon. They also in-  
19       stalled machine guns, a radar station, and dug three  
20       caves, reinforced them with concrete and stored ammuni-  
21       tion and provisions in the caves."  
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1           The next seven depositions, may it please  
2 the Tribunal, are made by residents of islands in  
3 the Marshall group.

4           I offer in evidence IPS Document No. 6030,  
5 being the deposition of Ferdinand Z. Emiz.

6           THE PRESIDENT: Admitted on the usual terms.

7           CLERK OF THE COURT: Prosecution's document  
8 No. 6030 will receive exhibit No. 901.

9           (Whereupon, the document above referred  
10 to was marked prosecution's exhibit No. 901  
11 and received in evidence.)

12           BRIGADIER QUILLIAM: I will now read an  
13 excerpt from the deposition of Ferdinand Z. Emiz:

14           "Date, 14 March 1946.

15           "I, Ferdinand Z. Emiz of Wotje Atoll,  
16 Marshall Islands, being duly sworn, depose and say  
17 that I am now employed as an interpreter at Naval  
18 Air Base No. 3234, Majure Atoll. I was attending  
19 school in Japan until 1938 when I returned to the  
20 Marshall Islands, Jaluit Atoll.

21           "Affiant further states that in August, 1938,  
22 he went to Wotje Atoll and was employed as an assis-  
23 tant to a surveyor who was taking measurements of  
24 the different islands. The Japanese commenced con-  
25 struction on the airfield at Wotje in June 1939.



1 About fifty Japanese laborers worked on this job.  
2 The complement there called for three officers and  
3 five chiefs. Three hundred natives were hired to  
4 construct a Japanese prison camp. Natives were paid  
5 one yen a day. Construction of the prison camp was  
6 completed in October, 1939, and the same month  
7 prisoners came from Japan to finish their sentences  
8 in the Wotje prison camp. After the arrival of the  
9 Japanese prisoners all native labor with the excep-  
10 tion of ten men and five women were returned to  
11 ORNEY island, Wotje Atoll.

12 "Affiant further says that in November,  
13 1939, all trees on Wotje island, Wotje Atoll were cut  
14 down so that the airfield could be constructed.  
15 About this time all prisoners (over two thousand)  
16 were returned to Japan and about one thousand Koreans  
17 and about two thousand Japanese laborers arrived at  
18 Wotje to continue the work on the airstrip. Native  
19 laborers were again drafted through the headmen of  
20 each island.

21 "Affiant further says that he saw large  
22 quantities of cement, asphalt and other construction  
23 material being delivered at Wotje island, Wotje  
24 Atoll for use on the airstrip."  
25

I offer in evidence IPS document No. 6032,



1 being the deposition of ABISA.

2 THE PRESIDENT: Admitted on the usual terms.

3 CLERK OF THE COURT: Prosecution's document  
4 No. 6032 will receive exhibit No. 902.

5 (Whereupon, the document above referred  
6 to was marked prosecution's exhibit No. 902 and  
7 received in evidence.

8 BRIGADIER QUILLIAM: I will now read an excerpt  
9 from the deposition of Abisa:

10 "I, ABISA, of Imej Island, Jaluit Atoll,  
11 Marshall Islands, being duly sworn, depose and say  
12 that I am now employed at the Native Labor Unit, Naval  
13 Air Base, Navy No. 3234. In 1938 the Japanese hired  
14 natives to cut trees on IMEJ island, Jaluit Atoll to  
15 make a place for the air field. There were two  
16 divisions of native working parties. One would work  
17 on gun emplacements and the other on the pier. These  
18 would be rotated. The Japanese Navy paid Yen 1.50  
19 per day and the Japanese Company Yen 1.20 a day. The  
20 Company was in charge of all supplies for the Japanese  
21 Navy and supplied natives to work for the Japanese  
22 Navy. Before the war the natives that were paid Yen  
23 1.50 a day had to buy their own food. Others were given  
24 food by the Navy."

25 I offer in evidence IPS document No. 6031, being



1 the deposition of LANEN.

2 THE PRESIDENT: Admitted on the usual terms.

3 CLERK OF THE COURT: Prosecution's document  
4 No. 6031 will receive exhibit No. 903.

5 (Whereupon, the document above referred  
6 to was marked prosecution's exhibit No. 903 and  
7 received in evidence.)

8 BRIGADIER QUILLIAM: I will now read an excerpt:  
9 "Date, 16 March 1946.

10 "I, LANEN, Maloelap Atoll, Marshall Islands,  
11 being duly sworn, depose and say that I am now em-  
12 ployed in the Native Labor Unit, Naval Air Base, Navy  
13 No. 3234. In 1939 I was living on Maloelap Atoll and  
14 in that year three hundred Japanese and four officers  
15 came to Tarawa Island on Maloelap. They put to work  
16 fifty natives to remove trees for an airfield. A little  
17 later five hundred more Japanese came from Japan.  
18 Eighty more natives were given work. The Japanese  
19 made the natives work from 6.00 AM to 5.00 PM for 85  
20 sen a day. The natives worked at cutting down trees  
21 and making concrete. The trees were carried by four  
22 men to a specific place. Natives were also used to  
23 carry heavy loads of sand from the beach to the air  
24 strip. If the native did not work to suit the Japan-  
25 ese he would be beaten. The Japs sent people with



1 broken limbs to the hospital but those who had internal  
2 injuries were not taken care of at the hospital. The  
3 airfield was finally completed in 1941 but barracks  
4 for the soldiers and other buildings were not completed."

5 I offer in evidence IPS document No. 6029,  
6 being the deposition of AJIDRIK.

7 THE PRESIDENT: Admitted on the usual terms.

8 CLERK OF THE COURT: Prosecution's document  
9 No. 6029 will receive exhibit No. 904.

10 (Whereupon, the document above referred  
11 to was marked prosecution's exhibit No. 904 and  
12 received in evidence.)

13 BRIGADIER QUILLIAM: (Reading)

14 "Date, 15 March 1946.

15 "I, AJIDRIK, of Laura Island, Majuro Atoll,  
16 Marshall Islands, being duly sworn, depose and say that  
17 I am employed as an Interpreter at Naval Air Base,  
18 Navy No. 3234. In the year 1940 I was living on  
19 Laura Island, Majuro Atoll. In that year the Japanese  
20 started to cut down trees on RITA, Island, Majuro Atoll  
21 to make an airfield. The Japanese did not pay for the  
22 trees they destroyed as they promised to do. This air-  
23 field was never completed. About the middle of 1941  
24 the Japanese started to take all men from Majuro Atoll  
25 to Mille, Malloelap and Jaluit Atolls to work on the



1 bases. Force was used in securing labor and those who  
2 did not wish to go were told that they would be put in  
3 prison or they would be threatened with a beating."

4 I offer in evidence I'S document No. 6010,  
5 being the deposition of JOHANIZ.

6 THE PRESIDENT: Admitted on the usual terms.

7 CLERK OF THE COURT: Prosecution's document  
8 No. 6010 will receive exhibit No. 905.

9 (Whereupon, the document above referred  
10 to was marked prosecution's exhibit No. 905 and  
11 received in evidence.)

12 BRIGADIER QUILLIAM: (Reading)

13 "March 12, 1946.

14 "1.Q. State your name and title.

15 "A Johaniz, Chief of Eniwetok tribe,  
16 Eniwetok Atoll.

17 "2.Q Have you been Chief of your tribe from  
18 January 1941 to the present time?

19 "A Yes.

20 "3.Q. When did the Japanese marines arrive on  
21 this atoll.

22 "A In January, 1942.

23 "4.Q. When did the Japanese navy arrive.

24 "A April 27, 1941."

25 I offer in evidence IPS document No. 6011,



1 being the deposition of ABREAM.

2 THE PRESIDENT: Admitted on the usual terms.

3 CLERK OF THE COURT: Prosecution's document  
4 No. 6011 will receive exhibit No. 906.

5 (Whereupon, the document above referred  
6 to was marked prosecution's exhibit No. 906 and  
7 received in evidence.)

8 BRIGADIER QUILLIAM: (Reading)

9 "Date, 12 March 1946.

10 "1.Q State your name and title.

11 "A Abream, Chief of Engebi tribe, Eniwetok  
12 Atoll.

13 "2.Q Have you been Chief of your tribe from  
14 January 1941 to the present time.

15 "A Yes.

16 "3.Q When did the Japanese Marines arrive  
17 on this atoll.

18 "A In January, 1942.

19 "4.Q. When did the Japanese Navy arrive.

20 "A April 27, 1941."

21 As the last deposition, I offer in evidence  
22 IPS document No. 6028, being the deposition of LAJINA.

23 THE PRESIDENT: Admitted on the usual terms.

24 CLERK OF THE COURT: Prosecution's document  
25 No. 6028 will receive exhibit No. 907.



1 (Whereupon, the document above referred  
2 to was marked prosecution's exhibit No. 907 and  
3 received in evidence.)

4 BRIGADIER QUILLIAM: (Reading)

5 "Date, 16 March 1946.

6 "I, LAJINA, of Mille Island, Mille Atoll,  
7 Marshall Islands, being duly sworn, depose and say that  
8 I am now employed at the Native Labor Unit, Naval Air  
9 Base, Navy No. 3234. I was living on Mille Island,  
10 Mille Atoll in 1941 when in June of that year the Japan-  
11 ese brought 3000 Koreans and Japanese laborers there  
12 and started to build an airfield. First they cut down  
13 the trees. Native labor was used for which the Japan-  
14 ese paid 85 sen a day. Native labor was used to cut  
15 down trees, mix concrete and to unload the ships which  
16 brought all kinds of material from Japan."

17 That concludes the depositions and I will  
18 now offer in evidence IPS document No. 2378A.

19 THE PRESIDENT: Mr. Logan.

20 MR. LOGAN: If the Tribunal please, may the  
21 record show that prosecution's exhibits 883 to 907,  
22 inclusive, are affidavits and not depositions as  
23 characterized by the prosecution?

24 THE PRESIDENT: According to the Australian  
25 terminology, those in the form of questions and



1 answers would be depositions, but what does it matter?

2 MR. LOGAN: According to our practice, as Your  
3 Honor may know, a deposition is a document where both  
4 sides appear and each asks questions. An affidavit is  
5 just where one makes the interrogations.

6 THE PRESIDENT: Ordinarily a deposition is  
7 taken before a magistrate.

8 BRIGADIER QUILLIAM: I will now offer in  
9 evidence prosecution's document No. 2378A. This is a  
10 file of correspondence which was obtained from the  
11 office at Honolulu of the well-known Japanese Shipping  
12 Company generally known as the N.Y.K. The file, which  
13 comprises correspondence between the Head Office of  
14 the Company and the Company's Branches, refers to the  
15 policy adopted by the Company under secret instructions  
16 from the Japanese Navy and Foreign Ministries of refus-  
17 ing to carry non-Japanese nationals to the Mandated  
18 Islands.

19 THE PRESIDENT: Admitted on the usual terms.

20 CLERK OF THE COURT: Prosecution's document  
21 No. 2378A will receive exhibit No. 908.

22 (Whereupon, the document above referred  
23 to was marked prosecution's exhibit No. 908 and  
24 received in evidence.)

25 BRIGADIER QUILLIAM: I will now read the



1 correspondence, excluding, however, the descriptions  
2 of the writers of the letters and the offices to which  
3 they were addressed, but identifying the letters by  
4 their numbers and dates.

5 I should like to direct attention, if the  
6 Tribunal please, to the certificate of Commander Maxon  
7 attached to the document showing how the documents  
8 came into possession of the International Prosecution  
9 Section.

10 THE PRESIDENT: I suggest you read them after  
11 the recess, Brigadier. We will recess now for fifteen  
12 minutes.

13 (Whereupon, at 1445, a recess was taken  
14 until 1500, after which the proceedings were  
15 resumed as follows:)  
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1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Brigadier Quilliam.

4 BRIGADIER QUILLIAM: May it please the Tri-  
5 bunal, I will proceed with the reading of the cor-  
6 respondence in exhibit -- in the N.Y.K. file.

7 "No. 185, March 28, 1933.

8 "Re: Deferring the booking of passengers de-  
9 siring to go to places in Inner South Seas Area.

10 "Lately, there has been a tendency toward the  
11 increase in the number of foreigners deciding to go to  
12 the islands in the Inner South Seas area, but since  
13 the facilities of this line are not only not suited  
14 in many respects to accommodate foreign passengers,  
15 but also the hotel facilities of the South Seas area,  
16 in general, are not suited to accommodate foreigners  
17 and since considerable inconveniences are apt to be  
18 experienced in case of stop-overs because of the poor  
19 shipping connections (besides, occidental meals aboard  
20 ships of this line may be wholly abolished), we would  
21 like to advise you not to book any foreign passenger,  
22 if possible, for the South Seas line until further  
23 notice.

24 "If obliged to do so, secretly inform whoever is  
25 in charge to accept applications only after they have



1       been first approved by the proper authorities."

2                               "#115

3               "Oct. 14, 1935

4               "Re: Ban against accepting foreign passengers  
5       for South Seas line.

6               "We acknowledge receipt of your wire, dated  
7       October 7, as follows:

8               "'-----please reserve 1st class 2 outside two-  
9       berth cabins Kasuga Maru 12th December from Yokohama  
10       Jaluit thence to Palao also Yamashiro Maru 17th Janu-  
11       ary Palao Menado.'

12               "We believe that the above was made in reference  
13       to the schedule of last year, but in reply, we sent  
14       the following wire, dated the 11th, as follows:

15               "'Referring to your telegram of 7th N.Y.K. South  
16       Sea Island Line no accommodation available until March.'

17               "As you have already received it, we believe that  
18       you understand it.

19               "As indicated in the Passenger Department's out  
20       Passenger, South Seas Branch #185, dated March 28,  
21       1933 (copy sent to you), every effort is being made  
22       not to accept foreign passengers for this line.  
23       Taking this into consideration, we suggest that you  
24       politely refuse this application.

25               "This is to affirm receipt of your telegram.



1 "As an actual problem, in accepting a foreigner,  
2 even if he is a resident of the South Seas, it is  
3 necessary for us to give notice of his name, age,  
4 occupation, nationality and so forth, to the South  
5 Seas Government, which confers with the Navy and  
6 Foreign Ministries and directs us either to accept  
7 or not to accept the application.

8 "Such being the case, we cannot accept any appli-  
9 cation unless approved by the proper authorities. As  
10 indicated in the aforementioned letter, we advised  
11 you 'to secretly inform whoever is in charge to  
12 accept applications only after they have been first  
13 approved by the proper authorities.' Hence, appli-  
14 cation merely by wire is of no use and even if an  
15 application is accompanied by a detailed letter, it  
16 is not certain that the approval of the proper author-  
17 ities can always be obtained. Instead, it is believed  
18 that they have been rejected in the majority of cases.

19 "Although there may be some business reasons, it  
20 would be wise to make it a general rule not to book  
21 any passenger for the South Seas line at agencies  
22 abroad.

23 "As reference, we are sending you a copy of  
24 Passenger, South Seas Branch #185."  
25



1 "#121

2 "Oct. 26, 1935

3 "Re: Ships sailing in February and March, 1936,  
4 on South Seas line.

5 "In regard to the above, we acknowledge receipt  
6 of the inquiry from the American Board of Commissioners  
7 for Foreign Missions of Boston through your letter  
8 dated September 28.

9 "However, as indicated in the circular, Passenger,  
10 South Seas Branch #185, dated March 28, 1933, we have  
11 adopted a policy of not accepting foreign passengers  
12 for this line and since the schedule is of practically  
13 no use as a schedule because of the frequent changes,  
14 we have stopped sending schedules of this line to our  
15 foreign agencies, lately. However, we are sending  
16 you a copy for reference.

17 "Through circular, Passenger, South Seas Branch  
18 #115, dated the 14th of this month and addressed to  
19 employees of Chicago (copies sent to all branch  
20 officers in America), we advised that all overseas  
21 branches make it a general rule not to handle passen-  
22 gers for this line, but since the missionaries of the  
23 American Board, Boston, which has made the inquiry,  
24 engage in missionary work throughout the South Sea  
25 Islands and frequently make round trips between Japan



1 and the islands, Rev. Harold W. Hackett, representa-  
2 tive of the above-mentioned American Missionary society  
3 in Japan and residing in Kobe, handles their passages.  
4 He seems to have a considerable number of friends in  
5 the government offices concerned. Hence, even if  
6 you do not handle their booking, we are sure that they  
7 will not experience any inconvenience. We are mention-  
8 ing this for your reference.

9 "Furthermore, since the matter concerning South  
10 Seas line and foreign passengers is a very delicate  
11 problem and the actual reasons cannot be frankly re-  
12 vealed to the foreign agents, who thus might make  
13 useless and irrelevant inquiries, it is suggested  
14 that you make arrangements to have only Japanese  
15 employees handle problems pertaining to the South Seas  
16 line and foreign passengers and to have all corres-  
17 pondence written in Japanese."  
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1 "#129

2 "November 4, 1935

3 "Re: Ban against booking occidental passengers for  
4 South Seas line.

5 "As stated in the circular, Passenger, South  
6 Seas Branch #185, dated March 28, 1933, no foreign  
7 passenger is to be booked for this line, if possible.  
8 However, there has been a trend, lately, for two or  
9 three branches abroad to apply for cabin reservations  
10 by wire or to order English schedules of this line  
11 for distribution. Hence, we are again listing the  
12 reasons for the difficulty of booking foreign passen-  
13 gers for this line and seeking your cooperation in  
14 this non-acceptance policy.

15 "1. General reason.  
16

17 "The meals aboard ships of this line are of  
18 Japanese standard and will not satisfy foreigners  
19 because only Japanese foods are served, breakfasts  
20 and suppers. Also, there are no hotel facilities in  
21 the South Seas, in general, to accommodate foreigners.

22 "2. Special reasons (secret).

23 "The year before last, we received a secret  
24 order from the South Seas Government office to the  
25 effect that if an application for passage aboard this  
line is received from a foreigner, regardless of the



1 fact that he is a resident of the South Seas, said  
2 application should not be accepted until his name,  
3 age, residence, occupation and so forth have been re-  
4 ported to and approved by the said government office.

5 "With the receiving of the above-mentioned  
6 report, the South Seas Government confers with the  
7 Navy and Foreign Ministries and directs us either to  
8 accept or not to accept the application, but to ob-  
9 tain approval appears not to be an easy task, for  
10 absolutely no foreigner, regardless of whether he  
11 is a resident of the South Seas or not, is accepted  
12 during naval manouvers (which sometime last over  
13 several trips).

14 "From the standpoint of national policy, the  
15 above measure is necessary, but since the authorities  
16 concerned cannot directly handle the policy of approv-  
17 ing (or disapproving) entry of foreigners to the is-  
18 lands because of the international situation, their  
19 entry is being controlled indirectly through our firm  
20 although it is a great deal of trouble to us. Besides,  
21 since the schedule for this line is often changed for  
22 governmental reasons, the schedule is apt to be of no  
23 use. Such being the case, it may cause you some dif-  
24 ficulties in dealing with your clients, but it would  
25 be a wise policy for agencies, particularly those in



1 far off places, not to handle passengers for the South  
2 Seas line.

3 "The above being the case, we desire all  
4 publicity in regard to this line cancelled, have  
5 stopped the publication of the English schedule (List  
6 No. 12) and the English guide (List No. 58) of this  
7 line. Since the mentioning of the latter in this de-  
8 partment's English circular, P. Ad. No. 77, dated  
9 March 15 of this year, and pertaining to the necessary  
10 amount of advertisement and printed matter for next  
11 (this) year, was a mistake, please abstract it from  
12 your copies.

13 "Since the above mentioned special reasons  
14 are matters that should not be revealed to your  
15 foreign passenger agents and since without this infor-  
16 mation they cannot be expected to carry out their  
17 work fully in dealing with passengers, it is sugges-  
18 ted that you make arrangements to have only Japanese  
19 employees handle problems pertaining to foreign pas-  
20 sengers for the South Seas line and to have all cor-  
21 respondence written out in Japanese."

22 "#347

23 "July 28, 1936

24 "Re: Advertisement of South Seas Line in August issue  
25 of Travel Bulletin.



1 "As we have been repeatedly directed to re-  
2 fuse all applications for passage on the South Seas  
3 line when applied for by foreign passengers, we find  
4 it difficult to understand the reasons for the publi-  
5 city given to conditions in South Sea Islands and the  
6 ships with excellent passenger facilities in the  
7 Travel Bulletin, our magazine for foreigners. As  
8 long as there is no special reason, we would like to  
9 request that arrangement be made to withhold publica-  
10 tion of items pertaining to this line in the future.

11 "Today, for example, a passenger desiring  
12 to book passage on that line appeared at our office.  
13 We had a difficult time in dealing with him and even  
14 our foreign agent, regretting his inability to supply  
15 sufficient information in spite of the existence of  
16 such a new line, suggested that we send a wire to  
17 you inquiring about the schedule and the existence  
18 of vacancies.

19 "However, explaining to him the useless-  
20 ness of sending such a wire because of the frequent  
21 change of schedule of the said line according to con-  
22 ditions in Japan, the complete booking of cabins by  
23 Japanese passengers on every voyage, the existence  
24 of no hotel facilities in the South Seas and the pro-  
25 paration of meals aboard ship according to Japanese  
taste, I refused the application of the said passenger."



1 I don't think I need read that letter, may  
2 it please the Tribunal. I will just refer to the  
3 reference in the last paragraph. (Heading):

4 "No. 50, April 8, 1937.

5 "Re: Mailing of revised South Seas line pas-  
6 senger rate schedule.

7 "The revised passenger rate schedule for this  
8 route, which has been sent to and is awaiting the  
9 approval of the South Seas government at present, is  
10 being sent to you (one set enclosed; ten sets under  
11 separate cover). Hence, use it as stated below, as  
12 though it had been approved. However, for caution's  
13 sake, we would like to add that the out trip rates  
14 for Osaka-Kobe-Moji-Yokohama run of all lines and  
15 the out trip rates for the Osaka-Kobe-Moji-Kulung-Naba  
16 run and the return trip rates for the Naka-Kobe run  
17 of the Saipan line have not been changed and are the  
18 same as stated in the notification, Passenger, South  
19 Seas Branch #183, dated December 21, 1936."

20  
21 I will omit the next paragraph and go on to  
22 the last. (Heading):

23 "To overseas branches:

24 "The above is being disseminated for reference,  
25 and the restriction against accepting foreign pass-  
engers has not been changed, as notified previously."



"No. 211, Mar. 13, 1939.

"Re: Ban against accepting foreign passengers for South Sea line.

"In regard to this matter, instructions were given in Passenger, South Seas Branch #185, dated March 28, 1933, and in Passenger, South Seas Branch, #129, dated November 4, 1935, but in view of the current trend of increase in the number of foreigners desiring passage to Inner South Sea Islands, it is desired that further attention be given to the following items;

"1. As a general principle, do not accept foreigners for this route. If a foreigner is to be accepted, send in the application with the details of the Passenger Department of the main office for approval.

"2. As reasons for refusal, state that the ships on this route are not equipped to accomodate foreigners in regard to facilities and meals and that there are no vacancies at present.

"3. Point out the fact that there is no hotel equipped to accomodate foreigners in the Inner South Seas Area.

"4. When information is obtained in regard to foreign passengers planning to tour Inner South Seas,



1 refer to this directive and notify the branch  
2 offices concerned."  
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1 Further evidence of Japan's policy of excluding  
2 foreign nationals from the Islands and, it is subritted,  
3 of the military and naval preparations which she was  
4 making there, is contained in pages 64, 65 and 66 of Court  
5 exhibit No. 58. These are papers relating to the foreign  
6 relations of the United States and Japan. I will read,  
7 if the Tribunal pleases, those pages.

8 "Telegram

9 "The Secretary of State to the Ambassador in  
10 Japan (Grew). (Paraphrase).

11 "Washington, June 13, 1936.

12 "For several years now the Government of Japan  
13 has requested each year that the American Government ex-  
14 tend facilities in its territorial waters off the Alaskan  
15 coasts to two Japanese Government ships and permit their  
16 entry into harbors in Alaska and in the Aleutian Islands  
17 that are not open, ordinarily, to foreign commerce. In  
18 the case of one of the vessels in question it was stated  
19 that its purpose in visiting these waters and harbors was  
20 the making of studies in connection with protection of  
21 fur-bearing seals; in the case of the second vessel, how-  
22 ever, it was not suggested that the visits would be made  
23 on basis of any treaty or formal arrangement between the  
24 American Government and the Government of Japan. The  
25 Government of the United States has acceded, nevertheless,



1 to the requests of the Government of Japan in this  
2 regard.

3 "A strong undercurrent of suspicion and con-  
4 jecture has existed for some time past over harbor  
5 developments or fortifications in possessions which  
6 both Japan and the United States have in the Pacific.  
7 No objection to the visits of Japanese Government vessels  
8 to the territorial waters and closed harbors of Alaska  
9 has been made by this Government, as it was believed  
10 that the opportunities which were open in this way for  
11 observation by Japanese vessels would serve to remove  
12 any suspicion which the Government of Japan might hold  
13 that any improvements have been made of such a nature  
14 as would violate either the letter or the spirit of the  
15 naval treaty signed on February 6, 1922.

16 "In our view, it is unfortunate that the Gov-  
17 ernment of Japan so far has not adopted an attitude  
18 similarly liberal in the face of allegations that in the  
19 Japanese mandated islands of the Pacific improvements  
20 are being carried out which are irreconcilable with  
21 Japan's treaty obligations not to fortify those islands.  
22 We can understand that the Government of Japan should  
23 be reluctant to give any countenance to irresponsible  
24 allegations, but nevertheless, that Government un-  
25 doubtedly shares with the Government of the United States



1 the view that persistent suspicion, with regard to this  
2 matter, is provocative of mutual distrust, and that such  
3 suspicion, therefore, should be dispelled.

4 "The American destroyer Alden will be sent  
5 shortly to the Asiatic station according to the Navy De-  
6 partment plans. The Japanese Government will thus have  
7 presented to it an opportunity to extend to a vessel of  
8 this Government courtesies at the larger unopened ports  
9 of the Pacific mandated islands, as well as at the open  
10 ports. An invitation by the Government of Japan for the  
11 Alden to visit those ports would have, in our opinion,  
12 highly beneficial results from the point of view of re-  
13 lations between the two nations.

14 "Please consider carefully and attentatively  
15 our views as we have sketched them. If no objection is  
16 perceived, please present these views informally and  
17 orally to the Minister for Foreign Affairs, putting for-  
18 ward the suggestion outlined in the foregoing paragraph  
19 as on your own initiative.

20 "Inform the Department currently by telegraph.

21 "Hull."

22 "Telegram

23 "The Ambassador in Japan (Grew) to the Secretary  
24 of State. (paraphrase). "Tokyo, July 8, 1936.

25 "Today I made suggestions, as on my own initia-



1       tive, to the Minister of Foreign Affairs with regard  
2       to an invitation to the Alden to visit open and unopened  
3       ports in the Pacific islands under Japanese mandate.

4               "Marked interest was shown by the Minister in  
5       the situation as I described it, but he professed not  
6       to know anything at all about the subject. He told me  
7       that he would see what there was that could be done and  
8       that he would try to give me, before July 20, the re-  
9       sults of his inquiries.

10                               "Grew."

11               "Telegram

12               "The Ambassador in Japan (Grew) to the Secre-  
13       tary of State. (Paraphrase). "Tokyo, July 28, 1936.

14               "At the request of the Vice Minister for For-  
15       eign Affairs, the counselor of the Embassy called on  
16       the Vice Minister to discuss certain questions that  
17       had been broached by the Ambassador to the Minister for  
18       Foreign Affairs. One of these questions related to  
19       the possibility of the visit by the Alden to ports in  
20       the Japanese mandated islands. This call was the only  
21       opportunity that presented itself for discussion of the  
22       matter since the visit of the Ambassador on July 8.

23               "The Vice Minister stated that the suggestion  
24       of the Ambassador had been referred to the Ministry of  
25       Overseas Affairs but that no reply had been received. "



1 He further stated that there would probably be con-  
2 sultation with other government departments. In re-  
3 sponse to a query by the Counselor, he expressed the  
4 fear that the Foreign Office had no way of expediting  
5 the reply.

6 "The manner of the Vice Minister was friendly,  
7 but it indicated that the Foreign Office could do  
8 nothing further.

9 "Grew."

10 "Telegram

11 "The Acting Secretary of State to the Amba-  
12 sador of Japan (Grew). (Paraphrase).

13 "Washington, August 7, 1936.

14 "Embassy's telegram No. 163, July 28, 1 p.m.,  
15 with regard to the suggestion made relative to the  
16 Alden, the Department assumes that there is no prospect  
17 that the Japanese authorities will take favorable action.  
18 In reply to a communication from the Japanese Embassy  
19 here, the Department is today returning an adverse answer  
20 to that Embassy's request that the Japanese Government  
21 training ship Shintoku Maru be permitted to enter a  
22 Hawaiian harbor which is not listed as a port of entry."

23 "Phillips."  
24  
25



1           If it please the Tribunal, that is all the  
2 evidence it is proposed to tender at this stage on  
3 this aspect of the case, but Admiral Richardson in  
4 the testimony to be given by him later in the case  
5 will give some additional evidence relating to this  
6 aspect.

7           My colleague, Captain Robinson, will now  
8 present evidence in connection with Japan's Naval  
9 Preparation for War.

10           THE PRESIDENT: Captain Robinson.

11           CAPTAIN ROBINSON: Mr. President and Members  
12 of the Tribunal: It is now proposed to present evi-  
13 dence to show Japanese naval preparations for wars  
14 of aggression, as charged particularly in Counts 1 to  
15 30, and specifically in Appendix A, Section 5-a.  
16 Documentary evidence will now be presented to show  
17 Japanese naval opposition to ratification of the  
18 London Naval Limitation Treaty of 1930.

19           I present to the clerk IPS document No. 1124.  
20 It is a book entitled "Minutes of the Committee  
21 Meetings for the Year 1930, Secretariat of the Privy  
22 Council." The certificate of the Secretary of the  
23 Privy Council is attached. I request that the clerk  
24 give to this IPS document a Court exhibit number for  
25 identification only.



1 CLERK OF THE COURT: Prosecution's document  
2 No. 1124 will receive exhibit No. 910 for identifica-  
3 tion only.

4 (Whereupon, the document above re-  
5 ferred to was marked prosecution's exhibit  
6 No. 910 for identification.)

7 CAPTAIN ROBINSON: I now offer in evidence  
8 an excerpt from this Court exhibit. The excerpt, in  
9 English text, consists of 42 pages. It is the minutes  
10 of the first to the thirteenth meetings of the In-  
11 vestigation Committee for the Ratification of the  
12 London Naval Treaty of 1930. The dates of the meetings  
13 extend from 18 August 1930 to 26 September 1930.,

14 THE PRESIDENT: Admitted on the usual terms.

15 CLERK OF THE COURT: Prosecution's document  
16 No. 1124A will receive exhibit No. 910A.

17 (Whereupon, the document above re-  
18 ferred to was marked prosecution's exhibit No.  
19 910A and received in evidence.)  
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1           CAPTAIN ROBINSON: I shall read extracts  
2 from court exhibit No. 910-A. It is first to be  
3 observed that the accused HIRANUMA is listed as  
4 present at each of these meetings, serving in the  
5 capacity of Vice-President of the Privy Council.

6           I shall now read from page 9, bottom para-  
7 graph of court exhibit 910-A:

8           "Councillor KANEKO charged that it is very  
9 unfortunate that the former as well as the present  
10 Cabinet regards the Privy Council as an enemy, and  
11 added that according to the newspapers the Adminis-  
12 trative Vice Minister of Foreign Affairs, NAGAI, in  
13 his speech at the oratorical meeting of the MINSEI TO  
14 held at Hibiya Public Hall on August 20th, stated as  
15 follows: 'If the Privy Council interferes with the  
16 ratification of the London Treaty, which the Cabinet  
17 intends to conclude for the sake of promoting inter-  
18 national peace and to lighten the national burden,  
19 we must fight them as the public enemy of our nation.'"

20  
21           I shall now read from page 17 of exhibit  
22 910-A, the third paragraph -- page 16 is the first  
23 insert; page 16, the third paragraph on page 16:

24           "Councillor KAWAI asked what the Premier  
25 meant when he answered in the Lower House that the  
Government would be solely responsible for national



1 defense. The Premier answered that he had just replied  
2 that it was unnecessary to discuss in the Diet the  
3 details of the negotiations between the military  
4 administration organization and the military command  
5 organization; and that as the Navy General Staff was  
6 not responsible to the outside, the Government would  
7 be responsible. The said Councillor again asked on  
8 what grounds the Premier had, regardless of the  
9 objection of the military, decided that the military  
10 strength decided upon by the Treaty was sufficient  
11 for our national defense; and what he meant when he  
12 said that the strength decided upon by the present  
13 agreement was only a part of our country's military  
14 strength. The said Councillor continued to ask about  
15 the authority possessed by the Chief of the Navy  
16 General Staff; and how the Premier could say, with  
17 a military strength of which the Chief of the Navy  
18 General Staff did not approve, that our national  
19 defense was secure. The Premier replied to each of  
20 these questions."

22 Now, at page 17, the middle paragraph:

23 "After this the same Councillor (KAWAI)  
24 pointed out that the Premier's explanation in the  
25 Privy Council was quite different from that which he  
had made in the Diet where he had stated that the



Government held the right to decide military strength. The Premier answered that he had not stated that the Government held the right of decision, but he had only said that the matter of concluding treaties should be decided by the Cabinet. He answered also that he could not state the scope and extent to which he took the military's opinion into consideration, as this was a confidential matter. Whereupon, the same Councillor asked how the Premier could explain that agreement had been reached when the matter required agreement by the military. The Premier explained that it was because he had thought that the military had had no objection after all."

I shall next read from page 20, the bottom paragraph, and continuing with the top paragraph on page 21:

"Then Councillor KAWAI asked to be allowed to speak, stating that he desired to bring the questions he had been asking for some time now to a conclusion, but as the Chairman said that there would be a further chance of reviewing the questions some other day, the said Councillor stated that it was simply beyond his comprehension that the Navy Minister should say in his reply in the House of Peers that the age when the strength of force determines all had



1 already passed, and advocate that the most important  
2 point as regards armaments lay in keeping them in a  
3 perfect state at all times. He argued that Japan's  
4 armaments should be based upon the possibility of  
5 a crisis in the peace of the Orient with America or  
6 other Third Powers intervening in Sino-Japanese  
7 relations over rights and interests in Manchuria and  
8 Mongolia, and demanded to know the Government's opinion  
9 on the matter.

10 "To this, the Premier replied that it was a  
11 fact that the ratio of strengths, vis-a-vis America,  
12 provided in this treaty would become more unfavorable  
13 for Japan the nearer we got to 1936, and therefore it  
14 would be quite natural that he /Councillor KAWAI/  
15 should worry about Japan's national defense, provided  
16 that it was interpreted in a narrow sense, but, the  
17 Premier continued, he believed that friendly relations  
18 with other Powers, financial adjustments and other such  
19 matters were likewise the essentials of national de-  
20 fense. Therefore, although he too was dissatisfied  
21 with some phases of the national defense he was deter-  
22 mined to put up with the present state of things for  
23 the time being; and although we would have to bear  
24 with the unfavorable ratio till the end of 1936, we  
25 would be able to build ships from the beginning of 1937,



1 and so we had better make preparations within the  
2 scope admitted by the treaty. If we commenced our  
3 ship-building simultaneously with the expiration of  
4 the treaty terms, we would soon be able to hold 70%  
5 as against America; and finally the Premier asserted  
6 that it was a groundless fear that America would raise  
7 trouble in China, taking advantage of the period when  
8 the ratio would be low for our country."

9 Turning to page 25, the middle paragraph,  
10 the second main paragraph:

11 "The Navy Minister replied that if the treaty  
12 failed to be concluded, then the United States would  
13 be hostile to Japan and there would be no guarantee  
14 that she would not undertake direct competition with  
15 our country in warship construction; that although  
16 the ratio against the United States in the 8-inch  
17 gun cruiser class would fall to 60% and the cruisers  
18 would be of old age, as pointed out by the Councillor,  
19 and no one could say that no trouble would occur then,  
20 it was not true that 6-inch gun cruisers could not  
21 necessarily stand up against 8-inch gun cruisers. He  
22 added that some admirals even asserted that they could  
23 successfully sink one 8-inch gun cruiser with four  
24 destroyers."  
25

I turn to page 29 of the minutes, the bottom



1 paragraph of page 29:

2 "Councillor KANEKO said that, according to  
3 the report of the United States Senate, what the  
4 United States fears most is submarines, and therefore  
5 the more the number of Japanese submarines was re-  
6 duced, the more powerful the United States would  
7 become. Stating that as long as Japan possessed sub-  
8 marines, there was nothing to be afraid of from the  
9 United States, that world peace and international  
10 faith were merely outward courtesies, and that peace  
11 was untenable without repletion of military strength,  
12 he discussed the indispensability of submarines."

13 I turn to page 34, the bottom paragraph on  
14 page 34:

15 "Councillor KUBOTA expressed opinion that  
16 for national defense, wealth and diplomacy were neces-  
17 sary in addition to military power, and although  
18 knowledge and spirit were most essential, yet there  
19 was no other way to settle international disputes but  
20 to resort to arms in the end. Japan's importance  
21 today in the world lay in her military power alone.  
22 The London Conference was where Britain and the United  
23 States gave expression to their avarice under the fine  
24 names of universal peace and the lightening of burdens,  
25 but they were only afraid of Japan's military power. "



1 " Such being the situation, he said, he was most con-  
2 cerned over the recent question of the Supreme  
3 Command and thought it was essential that the Navy  
4 Minister and the Navy Chief of Staff come to an  
5 agreement in deciding the military strength. There-  
6 fore, upon hearing that the Minister concerned had  
7 replied in his recent instructions that the two had  
8 come to an agreement he was greatly relieved."

9 I shall quote two more extracts, page 35,  
10 the middle and bottom paragraphs: This is Councillor  
11 KANEKO talking.

12 "Japanese-American relations would be at  
13 their most dangerous point about 1937. The United  
14 States would most certainly purchase the South  
15 Manchuria Railway in cooperation with China and would  
16 attempt to drive Japanese influence out of Manchuria  
17 and Mongolia. Such being the case, it was extremely  
18 important to supplement the lack of military strength  
19 caused by the London Treaty. Justice, he said, was  
20 only superficial courtesy between nations, and the  
21 last resort was military power alone. That Japan could  
22 abolish extra-territoriality was due entirely to the  
23 Sino-Japanese War. On the other hand, the Netherlands  
24 which had once been known as the world's wealthiest  
25 country had fallen today to the position of a third-rate



1 country because of the limitation of her armaments.  
2 That a small country like Japan could advance into the  
3 world as one of the Five Great Powers was due entirely  
4 to the military men. The Treaty of Portsmouth was also  
5 a reward of Japan's military's victory."

6 And the concluding paragraph at the bottom  
7 of that page:

8 "As the Japanese military system was character-  
9 istic of Japan, being based on the Japanese fighting  
10 spirit, soul, and national structure, it should be  
11 perfected to the last. On the basis of the speeches  
12 made in the United States Senate there could be no  
13 doubt that the London Treaty was a preparation for  
14 pressure against Japan after 1936."

15 I now present to the Clerk IPS document No.  
16 891. This is a book entitled, "A Record of the Privy  
17 Council Concerning the Ratification of the London  
18 Naval Treaty of 1930," dated 1 October 1930. The  
19 certificate of the secretary of the Privy Council is  
20 attached. I request that the Clerk give this document  
21 a court exhibit number for identification only.

22 CLERK OF THE COURT: Prosecution's document  
23 No. 891 will receive exhibit No. 911 for identification  
24 only.  
25

(Whereupon, the document above



1 referred to was marked prosecution's  
2 exhibit 911 for identification.)

3 CAPTAIN ROBINSON: I now offer in evidence  
4 an excerpt from court exhibit No. 911, marked for  
5 identification only. The excerpt in its English trans-  
6 lation consists of twenty-four pages. It is the  
7 record of the conference of the Privy Council regard-  
8 ing the Imperial ratification of the London Naval  
9 Treaty of 1930, held on Wednesday, 1 October 1930.

10 THE PRESIDENT: Admitted on the usual terms.

11 CLERK OF THE COURT: Prosecution's document  
12 No. 891-A will receive exhibit No. 911-A.

13 (Whereupon, the document above  
14 referred to was marked prosecution's exhibit  
15 No. 911-A and was received in evidence.)  
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1           CAPTAIN ROBINSON: I shall read the following  
2 extracts from Court exhibit No. 911-A. It is first  
3 to be observed that the accused HIRANUMA is listed  
4 as present at the meeting in the capacity of Vice-  
5 President of the Privy Council. I shall now read from  
6 page 13 of the document; page 13 middle paragraph.

7           "No. 4 (HAMAGUCHI): I should now like to  
8 state briefly the opinion of the Government on today's  
9 problem of ratification of the London Naval Treaty.  
10 The object of the London Naval Treaty, as has just  
11 been reported by the Chief of the Investigation  
12 Committee, is to prevent the danger of competitive  
13 armament for the sake of world peace, and to reduce  
14 the burden of taxes; and this treaty has been signed  
15 and sealed by the representatives of the Five Powers --  
16 Japan, Britain, the U.S., France and Italy. As far  
17 as successful in an agreement on the limitation of  
18 auxiliary ships which had not been realized at the  
19 Washington and Geneva Conferences, and have been  
20 able to put a limitation on every type of ship."

21           I shall now read from page 18, the bottom  
22 paragraph:

23           "No. 5 (TAKARABE): The first point of your  
24 question seems to be, when did the so-called three  
25 great principles come into existence, which did not



1 exist in 1927/Showa 2/, at the time of the Geneva  
2 Conference. Of course, there was no such thing as the  
3 three great principles at the time of the Geneva  
4 Conference. To be precise, even at the last conference,  
5 they have neither been clearly implied in the instructions  
6 given to the plenipotentiaries nor have they been  
7 formally declared. Why, then, have there been rumors  
8 about them?"

9           Next, the following page, the bottom of page  
10 19 next to the bottom paragraph:

11           "The so-called three great principles are  
12 concerned with the military strength necessary for  
13 the execution of the plan of operations based on the  
14 national defense policy decided in 1923/Taisho 12/.  
15 Thus, the three points - 70 per cent in total, 70  
16 per cent in cruisers with 8-inch guns, and the present  
17 strength in submarines - were instructed. No mention  
18 was made as to which of the three would be the more  
19 important, and the expression 'the three great principles'  
20 was not used in any of the official documents. Just  
21 because these three were the main points in our demands,  
22 people called them the three great principles. The  
23 navy has always attached importance to them.

24           "As has been explained by Councillor ISHII,  
25 we had failed to accomplish our demand of 70 per



1 cent in capital ships at the Washington Conference,  
2 and it was decided at 60 per cent; and also at the  
3 Geneva Conference our strength in auxiliary ships  
4 was set at 60 per cent in the provisional compromise  
5 draft between Japan and Britain. Accordingly, our  
6 Naval authorities, after years and years of investigations,  
7 were well aware of the difficulties in carrying through  
8 our demand of 70 per cent. In view of these former  
9 experiences, they had instructed our plenipotentiaries  
10 with the three great principles, for the first time,  
11 just before the opening of the last Conference.  
12 Prepared to fight with their backs against the wall,  
13 they put every effort into obtaining the understanding  
14 of the whole nation. For this purpose, young officers  
15 made trips to various places and gave lectures,  
16 greatly emphasizing the importance of the three great  
17 principles. Some of them seem to have pushed their  
18 arguments to extremes by stressing that it would  
19 mean the ruin of our nation if we would fail to  
20 accomplish these principles. These were all manifesta-  
21 tions of their patriotic spirit, and as a result,  
22 the public opinion was thoroughly unified. I believe  
23 this has had much to do with our success at the Conference  
24 in obtaining the ratio of 70 per cent in total tonnage."

25 And a final quotation at page 22, beginning



1 with the main paragraph:

2 "No. 4 (HAMAGUCHI): As regards the London  
3 Treaty, there had been, prior to its being referred  
4 to the Privy Council for deliberation, various  
5 rumors in public about the influence it will have  
6 upon the political world, and some mischievous  
7 elements, in line with these rumors, had been spreading  
8 a number of wild tales. For this reason, there were  
9 indications that unrest had been arising in the political  
10 and financial worlds. The treaty was referred to  
11 the Privy Council for deliberation on July 24, and  
12 after preliminary investigations by the Secretariat  
13 of the Council, it was brought before the Investigation  
14 Committee which convened for the first time on  
15 August 18. Since then more than fifty days had passed  
16 till September 17, and the meeting of the Committee  
17 had been held twelve times during that period.  
18 Meanwhile, the newspapers in Tokyo, not being informed  
19 of the proceedings of the Investigation Committee  
20 which had been kept secret, indulged in conjectures  
21 and published a number of articles. Readers, ignorant  
22 of the circumstances, would either harbor suspicions  
23 about the destiny of the treaty, or would be sceptical  
24 about a probable discord between the Privy Council  
25 and the Government. Various organizations, taking



1 advantage of this situation, began one after the  
2 other to attempt mischief-making; and among the various  
3 articles, there were some that could be classified  
4 as reprehensible. They were openly or secretly  
5 distributed to various quarters, and every means  
6 of alienation and slander were attempted. This  
7 being the situation, it was impossible for people  
8 to discriminate truth from falsehood and good from  
9 bad. As a result, it is a fact that cannot be concealed,  
10 that the general public was driven to an indescribable  
11 sort of unrest and unhappiness. Even if it were not  
12 so, public feeling today is apt to lack stability and  
13 self-possession, and it is deplorable that such a  
14 condition should long continue.

15 "As long as the destiny of this treaty  
16 remains undecided, it will not only be impossible  
17 to eradicate this type of unrest, but it is evident  
18 that there will be a tendency for the unrest in public  
19 feeling to gradually increase, incited by daily  
20 articles in newspapers and all the other scandalous  
21 propaganda. The problem of the financial world in  
22 particular, is what the Government cannot help but  
23 be mostly concerned about."

24 I shall now offer in evidence documents to  
25 show Japanese naval activities in opposition to the



1 Naval Limitation Treaties, mainly the Washington  
2 Treaty of 1922, the London Treaty of 1930 and the  
3 London Treaty of 1936.

4 Documentary evidence will now be presented  
5 from Court exhibit No. 58 already in evidence -- Court  
6 exhibit 58, I believe it is before the Court-- pages  
7 1 to 63, which include pages 249 to 306 of Volume I,  
8 State Department papers relating to the foreign  
9 relations of the United States and Japan, 1931-1941.

10 I shall read first at pages 5 to 9, the  
11 communication from the United States Ambassador,  
12 Joseph C. Grew, to Secretary of State, Cordell Hull,  
13 dated at Tokyo, 15 September 1933:

14 "Sir:"--

15 THE PRESIDENT: This is a rather long letter.  
16 I think you had better read it in the morning, Captain.  
17 We will adjourn now until half past nine tomorrow  
18 morning.

19 (Whereupon, at 1558, an adjournment  
20 was taken until Friday 1 November 1946, at  
21 0930.)

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