

RELATIONS BETWEEN
THE SOVIET UNION AND JAPAN

O P E N I N G
S T A T E M E N T

Minister S. A. Golunsky,
Associate Prosecutor for
the U.S.S.R.
Maj. Gen. A. N. Vasiliev
Maj. Gen. V. S. Tadevosyan
Col. S. J. Rosenblit
Col. A. I. Ivanov

Associate Counsel

MR. PRESIDENT, MEMBERS OF THE MILITARY TRIBUNAL FOR THE FAR EAST:

My task consists in substantiating that part of the Indictment which deals with the Japanese aggression against the Soviet Union, i.e., Counts 1, 4, 5, 17, 25, 26, 35, 36, 44, 51, 52, of the Indictment and Chapter 8 of Appendix "A". But the nature of this aggression as well as the nature of the whole World War, a part of which it was, is such that it is quite impossible to consider it separately from other phases of the war with which it is closely bound up.

Thus, for instance, it is quite impossible to understand what importance for the whole world had the stay of a million-strong Japanese Army in Manchuria and Korea in 1941-42, if we do not take into consideration that that was a culminating point of Hitlerite aggression, though in 1942 a number of circumstances had already caused the weakening of the German rear and consequently of Germany as a whole, that at that time the Hitlerite troops were on the approaches to Moscow, Leningrad and Stalingrad, that the German-Italian troops were a few days' marching distance from the Suez Canal while the Japanese troops seized one by one various territories in the Pacific Ocean; it is quite impossible to understand, for example, how Japan dared to attack the U.S.A. and Great Britain if we do not bear in mind that the Japanese Imperialism counted on the German victory in Europe, which means a corresponding prognostication

of Japanese politicians as to the outcome of the war between Germany and the U.S.S.R.

Therefore, I am compelled to touch upon a number of such problems which are considered in detail in other phases of the present trial, i.e., the seizure of Manchuria, the agreement between Japan on the one hand and Germany and Italy on the other, a number of episodes from the Japanese aggression in China. But I shall deal with these episodes insofar as they are inseparably connected with the Japanese aggression against the Soviet Union and I shall do my best not to be repetitious.

We charge the people who are in the dock in this court room with having committed a number of crimes in the period between 1928 and 1945. But we cannot understand the events of this period, in particular Japanese aggression against the Soviet Union in the period covered by the Indictment, if we do not take into consideration the historic background in which this aggression was developing.

Therefore, I feel bound to touch upon a number of generally known historic events preceding the period covered by the Indictment. This is particularly necessary because it is impossible to correctly understand and qualify the crimes with which the accused have been charged if we do not bear in mind the historic events which predetermined the conditions in which the accused acted.

Later on we shall present to the Tribunal evidence

proving that after the seizure of Manchuria the Japanese command manned the units stationed along the Manchurian-Soviet frontier, mostly with officers, who participated in the intervention of 1918-1922. The Tribunal will not be in a position to qualify this very important fact properly if they do not take into consideration some characteristic features of the Japanese intervention in the Soviet Far East in 1918-1922.

As soon as the teeth of the young predatory Japanese imperialism had grown, it attacked our country.

①
1904
It is a matter of common knowledge that in 1904, over forty years ago, the Japanese treacherously attacked the Russian squadron in the roadstead of Port Arthur. Even in those days that attack made without a declaration of war, was severely condemned by the public opinion of the whole world, and at the Hague World Conference in 1907 caused the conclusion of the convention concerning the opening of hostilities.

But only now after the attack on Pearl Harbor this old historic episode may be understood in its true light. The attack on Pearl Harbor is an exact replica of the attack on Port Arthur. The same method was employed: A surprise attack under the cover of negotiations which were then being conducted. This is no chance coincidence, this is a method of Japanese aggressive policy, this is a Japanese military doctrine on which whole generations of Japanese officers were brought up.

And small wonder that as it has already been proved here, HITLER, in December 1941 through the defendant OSHIMA congratulated Japan on the successful employment of such a treacherous method of warfare saying that he had always done so before and was going to do so in the future.

Having availed herself of the advantage accruing from the treacherous attack, weakness of the tsarist Government and treachery of German generals serving in the tsarist army, Japan attained some military successes in the war against Russia. But Japan paid a high price for these successes: Her manpower and financial resources were so exhausted that she could make use of the fruits of her military successes only to a very small degree. Japanese aggressive appetites were far from satisfied and the Japanese imperialism was awaiting the next opportunity for further aggression against our country.

1918
(2)
This opportunity, as is generally known, afforded itself in 1918. The Japanese Government organized at that time intervention in the Soviet Far East and sent Japanese troops there. But the real aim of Japan was then a crazy plan to cut off the whole Soviet Far East from Russia, and establish the puppet government there, which would be completely dependent on Japan.

The well-known ^{Semenov} starost SEMENOV one of the leaders of white bands operating at that time in the Far East whose affidavit we shall submit to the Tribunal told that on

November 20, 1920 when he and his staff were at the station of Manchuria, Colonel Isome, representative of the Japanese General Staff, came from Vladivostok and informed SELENOV, that the Japanese Government was planning to create an independent government in the Maritime Province and was ready to support him as a candidate for the post of the head of that government.

This proposal, was confirmed to SELENOV by a number of prominent Japanese politicians and military leaders. Among them was Count MATSUDAIRA, later a well-known Imperial Household Minister, who was then Chief of the Japanese diplomatic mission in the Far East.

MATSUDAIRA told SELENOV that he, SELENOV, upon becoming the head of the Far Eastern Government, should eliminate all the so-called border formalities between the Maritime Province and the territory under the Governor-General of Korea, in other words--do away with the border line between the Maritime Province and Korea, and to include the Maritime Province into the frontiers of China.

At the same time, according to SELENOV's testimony, General TACHIBANA and Colonel UEDA--later on the Commanding General of the Kwangtung Army of the period when the Army attacked the Mongolian People's Republic in the Bomongan area, told SELENOV that in the future the Japanese government was planning to create an independent government under SELENOV in the Zabaikalye and to completely annex the Maritime Province.

I shall not dwell in detail on the various episodes relating to that time, about the rule of terror which the Japanese troops established in the Soviet Far East, about the active support of the whiteguard bands by the Japanese troops which was contrary to the solemn assurances of the Japanese Government that it had no intention to interfere with the domestic affairs of Russia.

We shall submit to the Tribunal the report, taken from the State Record office of the U.S.S.R., about burning down the Ivanovka village which was carried out by the Japanese in March 1919.

From this report the Tribunal will see that ever at that time the Japanese military used the same methods which other Japanese officers used in China, the Philippines and in other places, and their spiritual brothers-- the hitlerite bandits repeated exactly in Czechoslovak village Liditsy, after 20 years have passed since ^{CE} Ivanovka village had been burned down.

During the Washington Conference, the first Japanese delegate Baron SHIDEHARA in his speech at the Conference assured that it was the fixed and settled policy of Japan to respect the territorial integrity of Russia, and to observe the principles of non-intervention in the internal affairs.

And at the same time, first in Dairen and then in Chunchin, during the negotiation with the representatives of the Far-Eastern Republic, which existed at that time, the

Japanese made the so-called 17 demands to the Republic. These demands are presented to the Tribunal, (Ex. No. 30).

The Tribunal will see from this document that Japan not only demanded for herself and her subjects number of economic privileges, but stipulated that the Far Eastern Republic be completely disarmed and all the fortifications and warships destroyed. On the other hand the Japanese Government stated that it will evacuate its troops from the Maritime Province area when it finds it convenient and in the period of time that it deems necessary.

Had these demands been accepted, all the military power on the territory of the Far Eastern Republic, the entire management of her economic resources, the whole conduct of her foreign policy--would have been in the hands of the Japanese.

If we compare the Japanese policy of that time as regards the Far Eastern Republic with what was later done by the Japanese in Manchuria, we shall see a striking similarity. Even as far back as in 1922, Japan was trying to employ for carrying out her aggressive aspirations the same method which she used ten years later in Manchuria. It follows then that that method was not a chance device of this or that Japanese statesman who was in power in 1931 Just as the method of a treacherous attack without declaring war, the method of creating puppet governments to disguise the Japanese aggression is one of the customary means of the Japanese imperialist clique. But the at-

tempt to employ this method on the Soviet territories ended in complete fiasco. Under the pressure of ever growing might of the Soviet State, under the blows of the uninterrupted struggle of the people against the Japanese invaders, and because of the tense internal political situation in Japan herself, the Japanese invaders were forced to clear the Soviet Far East.

The attempt to seize the Soviet Far Eastern territories ended in failure, but the Japanese militarists and imperialistically minded politicians continued to dream of that till the very last moment and that determined a number of their aggressive acts during the period covered by the Indictment.

They could not forget the vastness of the Soviet Far East where they had once been before; they could not forget its natural resources, which at one time they had considered their own; and they regarded their withdrawal from the Soviet territories as a temporary retreat which was forced on them by the circumstances.

In August 1941, after Germany had already attacked the Soviet Union, the defendant ARAKI in his talk with ISHIWATA, General Secretary of the "Imperial Rule Assistance Association" recollecting the Japanese intervention in the Soviet Far East in 1918-1922 expressed his regret that Japan had not carried out her purpose to the end and had not begun at the same time setting the new order in East Asia.

Thus with the firmly established tradition of cherishing aggressive plans directed against our country, the Japanese militarists and politicians entered into the period of World War II.

One of the peculiar features of this war is that it came stealthily and unexpectedly for the peace-loving nations.

ve { As regards the World War I, it is possible to name the exact day on which it broke out -- the first of August, 1914 -- but it is extremely difficult to find such a date -- which would signify the outbreak of World War II -- the first of September, 1939 cannot be taken as a day on which the Big War broke out in Europe. For a long time before that, guns had been fired and blood had been shed in various parts of the world; in Abyssinia, in Spain, and in China.

9/18/31 (3) If it is at all possible to fix the date which could be taken as a beginning of that sanguinary period known as World War II -- September 18, 1931 could, perhaps, be named such a date with good reason.

We shall submit to the Tribunal evidence which will prove that the Japanese propaganda emphasized the following facts as special achievements of Japan, namely that the Russo-Japanese war and the war between Japan and China preceded World War I; that Manchurian Incident preceded the German nazis' coming to power, the annexation of

Doc. No. 6909

Abyssinia, the civil war in Spain and the re-militarization of the Rhine area and that the Sino-Japanese Incident preceded the annexation of Czechoslovakia and Albania and the Anschluss.

✓6 The Japanese were boasting that they were the initiators of world fascism and world aggression. The point, of course, is not whether the Japanese example inspired Hitler, or Hitler's bandit exploits inspired the Japanese. Aggression, unleashed by both of them, was a result of the criminal activities of the same groups in all aggressive countries. HITLER's coming to power in Germany and MUSSOLINI's in Italy, and the rapid development of the Japanese imperialism expressed in all these countries the interests of the most aggressive and reactionary social groups.

For us it is important that these enemies of mankind which were active in Europe and in the Far East were mutually connected and were persistently and systematically leading an offensive against freedom, democracy and peaceful labor of the peoples.

The World War II included in itself all the population of the belligerent states which constitutes about two-thirds of the population of the Globe. That is why the German military doctrine invented the term "Total War" for the aggressive war, unleashed by the aggressive countries, total in the sense that for the waging of this war

total also in the sense that all the citizens of the country -- victim to the aggression -- come under the blow; belligerents and civilians, men and women, the old and the young. The waging of this war requires a special weapon, a state mechanism specially designed for this purpose -- "mechanism" -- the task of which is to suppress by terror any protest in its own country and to mobilize all forces for the purpose of waging aggressive wars against foreign countries.

If we compare what was going on in Germany, Italy and Japan in the period between the first and second World Wars we shall see a complete analogy in this respect. Everything that there was of democratic nature in those countries was stamped out thoroughly though at different rate and in different ways. In all those three countries the working class movement, which could resist the aggressive aspirations of the leaders of those countries was being suppressed by terrorist methods. The best representatives of the toiling masses were being imprisoned, sent to concentration camps or went to the scaffold, levers of the state machine specially adjusted for this purpose, such as secret police, gendarmery have assumed formidable size and acquired an outstanding importance in the inner policy of those countries.

The terror was not a matter of chance, it was a

Dec. 10. 1909

necessary prerequisite for the preparation of aggressive wars; because without it no protest against aggression within the aggressive countries themselves could be suppressed, no firm rear could be created.

There was another feature common to all those three main aggressors of our time -- that was an advocacy of brutal nationalism, an attempt to impress upon their people the idea of their alleged right to rule over other peoples.

Evidence has already been submitted of systematic measures taken in the course of quite a number of years to poison the minds of the Japanese people with ideas of aggressive nationalism and imperialism. We shall submit to the Tribunal a number of documents which show how they did actually plan to put these ideas into practice with regard to the Soviet territories.

In Japan, as well as in other aggressive countries, the state machine itself was made a weapon of crime. In the hands of the social groups and political parties, some representatives of which are here in the dock, this state machine was the same weapon that is a knife or a gun in the hands of a common murderer or a bandit; the only difference being that separate individuals perished from the knife in the hands of a bandit, while millions perished from this monstrous weapon of crimes, into which the Japanese state machine was transformed by these people.

We shall try to prove that during the period covered by the Indictment, the development of the Japanese aggression against the Soviet Union progressed in such a way, that, though only on two occasions it led to the state of an open, though undeclared war, the conduct of Japan in regard to the Soviet Union for the rest of the time was such that the Soviet Japanese relations could by no means be fitted into the notion of "State of peace."

During the whole period covered by the Indictment the Japanese military planned and prepared a war of aggression against the Soviet Union with the consent and approval of the Japanese Government. In the course of this time our people, who live in the Soviet Far-Eastern districts felt like a man at whom a bandit pointed his gun and who every minute, day and night, had to be ready to repulse the attack which threatened them. The Soviet Far East lived in anxiety expecting the Japanese attack. On the vast territory east of the Baikal lake the Soviet people because of these Japanese imperialists, whose representatives are here in the dock, were bereft of the possibility of following peaceful pursuits and had to be ready at any moment to put aside the plough and hammer in order to take up the rifle.

It is only due to the constant vigilance of the Soviet people and the Soviet Government, only due to the

relentless tension of the whole population of the Far East, that the latter succeeded in avoiding the Japanese invasion. Those who have never felt the state of permanent and immediate military menace can hardly imagine the sense of immense relief which the military rout of Japan brought to the Soviet people.

Two hotbeds of world aggression had got into shape before World War II broke out -- i.e. -- Germany in Europe and Japan in Asia.

Their hostile attitude towards the Soviet Union has still greater significance because of the geographical position of our country in between these two hotbeds. No wonder, the Japanese and German aggressors held out their hands to one another and hoped to crush the Soviet Union by their joint efforts.

This enmity of both German and Japanese cliques towards our country served as a good reason why these two biggest aggressors of our time joined their hands for the first time and entered into a criminal conspiracy against all democratic countries.

During the whole period covered by the Indictment, the forms and manifestations of the Japanese aggression against the Soviet Union varied but immutable remained the main aim -- in this or in that way, by hook or by crook -- to seize whatever part of the Soviet Union they could lay their hands on, to deal our country a blow, whenever possible.

For the sake of convenience we may divide the whole period of the Japanese aggression against the U.S.S.R. covered by the Indictment into four parts. Each part is characterized by a specific form of the Japanese aggression against the Soviet Union.

- (a) The period from 1928 until the seizure of Manchuria;
- (b) The period from 1931 to 1936;
- (c) The period from 1936 until the outbreak of the Big War in Europe in 1939;
- (d) The last period until the surrender of Japan.

PERIOD FROM 1928 TO 1931

In 1925 the convention concerning the basic principles of peaceful relations between the U.S.S.R. and Japan was concluded in Peking. This convention has been submitted to the Tribunal (Exhibit No. 31). According to the convention Japan took upon herself the obligation to support neither directly nor indirectly any organizations or groupings whose activities would be hostile to the Soviet Government. According to the Portsmouth Treaty of 1905, which was confirmed by the said convention, Japan pledged not to carry on any military preparations either in Korea or in Manchuria, directed against Russia; she also pledged not to use the Manchurian railroad for military purposes.

Treaty 1925
+ 1905

MRK

All these pledges were grossly violated by Japan. We shall prove in evidence before the Tribunal that beginning from 1928 the Japanese warlords, the Japanese General Staff and the Japanese Government were already planning a war of aggression against the Soviet Union, waiting for a suitable occasion for the initiation of such a war.

However, the military in Japan were aware that without having a sound military base it was difficult to expect to wage war against the Soviet Union successfully. That is why in the period of 1928-1931 the Japanese military were so greatly concerned about acquiring such a military base. It is natural that their attention was drawn first of all to Manchuria, that could easily be transformed into a military base for a further expansion of the Japanese aggression both towards China and toward the Soviet Union.

While preparing for this first step the Japanese military during the period of 1928-1931 and later on as well, were planning and carrying on an underground war of sabotage against the Soviet Union. It is important that in all their activities the Japanese aggressor were not satisfied with gathering espionage information concerning the Soviet Union but paid great attention to such methods of causing damage to the Soviet Union as smuggling their agents onto the Soviet territory to disorganize the Soviet economy by staging explosions,

*Manchuria
as a
base.*

*underground
war*

(5)

agents

derailing trains, etc., to commit terrorist acts against the leaders of the Soviet state, and, in general, to such hostile acts which are fully contradictory to the generally accepted notion of peaceful relations between countries.

We shall submit evidence to the Tribunal testifying that during those years such sabotage and undermining activities of the Japanese agents against the Soviet country were carried out according to plans previously carefully elaborated following direct instructions of the Japanese military.

We shall submit evidence to the Tribunal which will prove the existence of a number of such plans. The military-diplomatic personnel of Japan took active part in all these sabotage activities.

For example, in 1929 in Berlin the defendant MATSUI held a special conference of Japanese military attaches in Europe; at the conference the question of organizing sabotage activities on the Soviet territory was discussed. We shall submit to the Tribunal notes made at the conference.

On November 15, 1929 the defendant HASHIMOTO, who at that time was military attache in Turkey, submitted to the General Staff a detailed report on how to make use of the Caucasus for "Political-Sabotage purposes against the U.S.S.R." In the report he submits not

only a detailed and elaborated plan of measures to be taken, but contemplates such steps as would cause controversy between the U.S.S.R. and other countries. We shall submit the complete text of this report.

THE PERIOD FROM 1931 TO 1936

9/18/1931

Sec. for Japan

The seizure of Manchuria in 1931 was a very important stage in the expansion of the Japanese aggression not only against China, but against the Soviet Union as well. Moreover, the occupation of Manchuria was of major importance, for the preparation of the Japanese aggression as a whole, because it was widely used to strengthen the influence of the militarist clique within Japan herself. It was by no mere chance that in Japan a number of terrorist acts followed the occupation of Manchuria, which were organized by underground societies composed of the most aggressive elements of the Japanese military.

The documentary evidence regarding these terrorist acts has already been submitted at another stage of the present trial. I will not repeat anything of what has already been said on the matter. I would only like to point out that the years 1931 and 1932 constituted an important phase both in foreign and home policies of Japan.

As to the foreign policy in these years there was

Terr
in Japan

committed the first overt act of aggression after the unsuccessful end of the Japanese intervention in the Far East. As to the home policy that was the final accomplishment of terrorist measures that had been carried out in a number of years against Japanese democracy, and in particular, against the working class.

araki

It is true that the underground terrorist organization of the so-called young officers instigated by the defendant ARAKI and others, who organized political assassinations in 1931-32, failed at that time to bring about a coup d'etat and take the power into their hands at once. However, the results of their activities were clear: The state machine of Japan and the policy followed by it after 1932 was shaped closer to the fascist pattern than it had been prior to that time.

Harada

In the first half of 1931, when the plan of the occupation of Manchuria was only being drawn up and its realization being prepared, the Japanese General Staff sent Major-General HARADA on commission to Europe. There are reasons to believe that one of the principal aims of his trip was to study the situation in Europe in connection with the preparation and activization of the Japanese aggressive policy being carried out at that time, on his way back Major-General HARADA stopped in Moscow and had a long talk with the then Japanese Ambassador in Moscow, the defendant HIROTA, and with

Hirota

the military attache Lieutenant-Colonel KASAHARA. We shall submit to the Tribunal a detailed record of this talk made by KASAHARA.

In 1931 talked way anti-Soviet

This document will show to the Tribunal that already in summer 1931 the question of an attack against the Soviet Union was put on the agenda not only by the leaders of the Japanese military, but by the Japanese diplomats as well and therefore it is evident that at the very beginning of the occupation of Manchuria they planned to turn it into a military base against the Soviet Union.

nothing to fear from USSR

We shall prove by this document that the Japanese Government and the Japanese General Staff knew from their official representatives in Moscow that Japan had nothing to fear on the part of the Soviet Union and therefore all talk about defense was only a camouflage of the aggression planned by the Japanese.

Hirota says not defense but plunder

It is of special interest that the same HIROTA, who later on signed the anti-Comintern pact, said that the principal aim of a war against the U.S.S.R. was not so much defense of Japan against communism as seizure of the Soviet Far East and the Eastern Siberia.

That this was not only HIROTA's private opinion but also the point of view held by the Japanese Government is clear from the following very important fact:

At the end of 1931 the Soviet Government proposed to

*Rejection
on prop.
non-aggression pact*

the Japanese Government that a non-aggression pact be concluded; this proposal was repeated in 1932. The Japanese Government rejected the proposal.

We shall submit to the Tribunal the documents which will show the complete course of negotiations of this question.

The Japanese Government refused to conclude a non-aggression pact with the U.S.S.R. on the ground that disputable questions existed between the U.S.S.R. and Japan and the time had not yet come to conclude the pact.

The Japanese Government paid no attention to the argumentation of the Soviet Government that the conclusion of the pact would have created favorable ground for solving these disputable questions.

Such attitude of the Japanese Government has only one meaning: The Japanese Government wanted to use the threat of military attack as an argument while negotiating on these disputable questions and if that threat would not have been effective enough, to carry out such an attack.

This refusal to sign the pact, proposed by the Soviet Union proves beyond any doubt that those military preparations which were started by the Japanese military authorities immediately after the occupation of Manchuria did not aim at defense but that the purpose of these preparations was to turn Manchuria and

Korea into a military base for waging a war of aggression against the Soviet Union.

*army increased.
52,000 - 270,000*

We shall submit to the Tribunal exhaustive documentary evidence which proves that approximately between 1931 and 1936 the strength of the Japanese troops in Manchuria increased from 50,000 up to 270,000 men. The number of planes increased three fold, the number of pieces of ordnance four fold, and the number of tanks more than ten fold. Simultaneously, the Kwantung Army command was feverishly working at the creation of a material base for the future attack against the Soviet Union: Barracks, military dumps were being built uninhabited territories in the Northern Manchuria, which had no economic importance; strategic railroads and highways leading to the frontiers of the Soviet Union were being constructed; fortified districts were being built on the Soviet frontiers.

material base for future attack.

*Portsmouth Treaty
Japan would keep no troops in Manchuria*

We shall submit to the Tribunal outline maps which illustrate these activities of the Kwantung Army, which were carried out in accordance with the directives of the Japanese General Staff and the Japanese Government, and in violation of the Portsmouth Treaty in which Japan gave obligations to keep no troops in Manchuria and construct no fortifications on the Russian frontier.

Hundreds of millions of yen were spent on these

*Govt
approved
spending
millions*

preparatory measures for a war of aggression against the Soviet Union and it can be easily understood that this could not have been done without an approval of the Government.

It will be enough to throw a single glance on the said outline maps in order to understand clearly that all military preparations in Manchuria were directed against the Soviet Union; they were concentrated in the north and particularly in the east across of Manchuria, near the points which, according to the operation plans of the Japanese General Staff (the existence of these plans will be proved by evidence to be submitted to the Tribunal), were to serve as a jumping-board for the invasion of the Japanese troops onto the Soviet territory.

Kyo-wa-kai

Japan created on the Manchurian territory the so-called "Kyo-Wa-Kai" society, the membership of which later on reached 4.5 million. The general purpose of this society, which was headed by the Japanese, was the consolidation of the Japanese influence in Manchuria, but we shall prove that one of the important and specific tasks of this society, to which the Japanese command paid most serious attention, was the ideological and organizational preparation of the Manchurian population for a future war against the Soviet Union.

Russian Emigrants

In spite of the obligation, which the Japanese Government took upon itself in the Peking Convention of 1925, the Kwantung Army command making use of the funds specially assigned for the purpose, undertook the organization of elements hostile to the Soviet Union, elements that were among the Russian emigrants living in Manchuria. The Japanese created a special organization "Bureau of Russian Emigrants" which was connected in its structure with the "Kyo-"a-Kai" society and worked under the direct leadership of the so-called Japanese military mission in Kharbin.

Sabotage

Doors

Chinese Russian RR

Intelligence

This organization pursued the aim of carrying out pro-Japanese propaganda hostile towards the Soviet Union, among Russian emigrants, to teach Russian emigrants methods of sabotage, to form them into special sabotage detachments, which were in time of peace secretly smuggled onto the Soviet territory, and for carrying out all sorts of provocative raids on the Chinese-Eastern Railroad, which passed on the Manchurian territory and was joint property of the Soviet Union and China. In war time it was planned to recruit special detachments out of Russian whiteguards, who had undergone special training under the direction of the Japanese intelligence service. These detachments were to operate in the Red Army rear.

If the principal activities of the Japanese

military in Manchuria in 1931-1936 were directed on the preparation for the future military operations, this in no way means that during that time the Japanese gave up hostile acts against the Soviet Union. These hostile acts were rather various as to their scale, and nature.

The Chinese Eastern Railroad became one of the objects of such attacks. During all this period, up to 1935, the Japanese military, both directly and through the so-called Government of Manchoukuo, were permanently organizing and encouraging acts of sabotage, violence and atrocities on the Chinese Eastern Railroad. Railroad accidents, bandit raids on the stations, murder and kidnapping of Soviet citizens were systematically organized.

Constantly carrying out peaceful policy, resisting provocation and wishing to avoid any pretext for further conflicts the Soviet Government in 1935 was forced to agree to sell the Chinese Eastern Railroad, at a low price, though this railroad was immensely important for the communication between the Soviet Maritime Province and Central Russia.

Another method of aggressive thrusts against the Soviet Union during this period was the instigation of innumerable frontier incidents. We shall present documents containing detailed information on these

hundreds of thousands of incidents
(7)

frontier incidents. Here it will be sufficient to mention that there were hundreds and thousands of incidents of different scale, beginning with small clashes between separate frontier-guard soldiers, smuggling groups of saboteurs and bandits and propaganda literature hostile to the Soviet Union onto the Soviet territory, and ending with military clashes of such considerable scale as the clash at the Hanka Lake in 1936, in which about a battalion of Japanese infantry took part.

During the same period Japan took all measures to establish her military, political and economic domination in the Inner Mongolia with the aim of spreading it later onto the Outer Mongolia, where in 1922 the Mongolian People's Republic had been formed.

Mongolian Repub.

The Japanese military planned the occupation of the Mongolian People's Republic intending to turn her territory into the military base for an attack against the vital lines of communication of the Soviet Union.

Itagaki

In March 1936 the defendant ITAGAKI, who at that time was Chief of the Kwantung Army Headquarters in his talk with Ambassador ARITA said that it was enough to throw a single glance at the map of the East Asia continent to see that the geographical situation of the Outer Mongolia had a great significance because she covered the flank of the Siberian Railway, which

connected the Soviet Far East and European Russian, from the influence of modern Japan and Manchoukuo. ITAGAKI emphasized the fact that should the Outer Mongolia join Japan and Manchuria, the safety of the Soviet Far East would have been upset almost completely and that probably would have given possibility in case of tense international situation to make Soviet forces withdraw from the Far East almost without opening hostilities. ITAGAKI assured ARITA that the army was planning in every way to spread the influence of Japan and Manchoukuo onto the Outer Mongolia.

What these methods were had already been sufficiently known by that time from the example of activities of the Japanese military in Manchuria and North China. As the Tribunal already knows, the Kwantung Army at that time was creating a puppet Government in the Inner Mongolia, which was under Japanese influence. The troops of the Kwantung Army were already approaching the borders of the Mongolian People's Republic. The Soviet Government, naturally, could not remain indifferent to this new stage of the Japanese aggression immediately directed against the Soviet Union, as it is clearly seen from ITAGAKI's words given above. Therefore, in March 1936 the Soviet Union and the Mongolian People's Republic signed a mutual assistance pact. This pact was submitted to the Tribunal (Exhibit No. 214).

*Mar. 1936 pact
w/ Mongolia
followed -*

The Soviet Government through the Japanese Ambassador in Moscow officially warned Japan that in case she attacked the Mongolian People's Republic the Soviet Union would help the latter with her armed forces. This made the Japanese aggressors think it out for a while, but not give up their aggressive plans. They realized that they could not possibly carry out their aggressive intentions against the Mongolian People's Republic and the Soviet Far East by their own forces. It was necessary to look for allies in Europe.

By that time Germany and Italy were distinctly outlined on the European background as definitely aggressive powers akin to Japan by their anti-democratic spirit. Germany by that time had already been intensely carrying out her program of armaments having unilaterally renounced the Articles of the Versailles Treaty which had provided for the limitation of German armaments. Her troops had already entered the demilitarized Rhine area.

Ethiopia
Spain
Italy by that time had already carried out her aggression in Ethiopia, joint Italo-German intervention had already been started in Spain.

The Japanese statesmen as well as the whole world clearly saw who in Europe would willingly agree to any diplomatic combination which could help to initiate a world war of aggression. Therefore, it was natural

that Japan commenced negotiations precisely with these aggressive countries particularly first of all with the Hitlerite Germany, which was the most aggressive country.

11/25/36
axis pact

On November 25, 1936 the so-called Anti-Comintern Pact was signed. The contents of the secret agreement attached to the Pact, now submitted to the Tribunal (Exhibit No. 36) was not known at that time. Now we definitely know that it was directed immediately against the Soviet Union. At that time Japan, as well as Germany, tried to convince the world that the Pact signed by them was a weapon of purely ideological struggle against the influence of the Comintern. But even then it was clear to the whole world that all this talk about fighting against the influence of the Comintern was only a screen hiding actual conspiracy of aggressive states to carry out joint aggression against the democratic powers. It was the first stage of the conspiracy between the aggressive powers, the aim of which was joint struggle against democracy and division of the rest of the world among themselves. The events soon showed the true meaning of this Anti-Comintern Pact. In the autumn of 1936 the Pact was signed and in summer of 1937 Japan began a new round of aggression in China and several months later Germany occupied Austria.

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We shall submit to the Tribunal evidence which will prove that the leaders of Germany and Japan (RIBBENTROP, HIRANULA and others) understood the importance and the true meaning of the Anti-Comintern pact precisely in the same way.

All the defendants bear personal responsibility for the conclusion of this pact, as it was one of the actions resulting from the conspiracy, which had existed between them. But first of all the responsibility for the conclusion of this pact rests with the defendant HIROTA, who was the Prime-Minister and Foreign Minister, at that time, and with the defendant HIRANULA, who was President of the Privy Council which, under HIRANULA presiding, approved of the conclusion of this pact.

Thus by 1936 Japan had completed the first stage of her military preparations in Manchuria and North China, had come to an agreement with the Hitlerite Germany on joint aggressive actions against democratic powers and was ready to carry out her aggressive designs in a new, more decisive and open manner.

All this found its expression in the Japanese attack against China on July 7, 1937, which has already been dealt with, on the one hand, and on the other, in the fact that Japan passed over from methods of underground war of sabotage and small provocative attacks

against the Soviet Union to the methods of open military attacks against the U.S.S.R. territory.

FROM 1936 TO THE BEGINNING OF THE WAR IN EUROPE

After the Anti-Comintern pact had justified its purpose in actions, as a link uniting the forces of the aggressors against democratic powers, Japan, governed by the criminal militarist clique, for the purpose of giving a large-scale range to her aggressive foreign policy, which was being conducted by means of gross violations of the international law, customs and treaties, began to strive for a still closer contact with the Hitlerite Germany and fascist Italy, which pursued the same aims in Europe.

On this basis, beginning from January 1938 Japan entered into negotiations with Germany and Italy on the conclusion of a complete military and political alliance between them.

The defendant OSHIMA, who at first was the Japanese military attaché, and then the Japanese Ambassador in Berlin, was from the Japanese side main moving power in these negotiations. During more than a year and a half negotiations led to no results because certain differences sprang up between Japan and Germany, concerning the nearest objectives of their joint aggression. Japan insisted that the Soviet Union should be this objective.

At the same time, HITLER, who had already gone far in working out and realizing his plans of conquest of world domination had no wish to limit these plans in any way.

In connection with this, these western and eastern aggressors for a long time could not reach understanding. It is known that this question was discussed scores of times at the conferences of leading Japanese ministers.

I repeat that the dispute between Germany and Japan did not concern the principles of the alliance. The principle was clear enough--to attack democratic countries and enslave peoples of these countries. The differences were whom to begin with, who was to be the first object of the attack.

The Japanese Government, headed at that time by HIRANUMA, thought that the time had already come to carry out the plan of military attack against the Soviet Union.

Here at this trial during the examination of the witnesses SHIDEHARA, UGAKI, OKADA and others we saw an absolutely ridiculous picture. We were asked to believe that all in Japan--the Government, including the War Minister, the Court circles and Japanese ruling class as a whole, that is all of them with the exception of several colonels and majors from the

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Kwantung Army were against aggression, showed their indignation, did all they could to stop it, and nevertheless the Japanese troops during ten years were marching on and on, starting new attacks, seizing new territories. (They try to tell us that seeing these events the alleged opposers of the aggression were only helplessly sighing and shrugging their shoulders.

They hush up the fact that these people exploited the results of the aggression which they allegedly disapproved of. We shall submit to the Tribunal evidence which will prove that the attacks of the Japanese troops against the Soviet territory and the M.P.R. territory were carried out with the knowledge of the Japanese Government with its permission and full approval as it had been by the way during other stages of the Japanese aggression.

In the diary of the defendant KIDO, submitted to the Tribunal (Exhibit No.178) there is an entry of June 21, 1941 in which KIDO stated that HIRANUMA, being the Prime-Minister of Japan many times raised the question of the necessity of an attack against the Soviet Union. But, as the treaty of military alliance with Germany had not yet been signed and the leaders of the Japanese Government could not be sure when exactly Germany planned to attack the Soviet Union, the Japanese Government and the General Staff were in such a position when on the one hand they

✓ wanted to initiate a war against the Soviet Union, and on the other hand were afraid to take this decision. The experience of a many years' aggression on the Chinese territory had already taught them that the so-called "Incidents" of all kinds often give better results than actual, so to say, official war.

The Japanese warlords, with full approval of the Japanese Government, decided to use the same method against the Soviet Union.

The first of such "Incidents", which in reality was an actual war in which artillery, tanks and air-forces participated, was an "Incident" staged by the Japanese Government and the Japanese Military on the approaches to Vladivostok in the Lake Hassen area.

We shall submit to the Tribunal evidence which will prove beyond any doubt that beginning from 1933, the Japanese military command paid special attention to this area. In July 1938 the command of the Japanese Korean Army began to concentrate its forces in the said area, on the frontier of the Soviet Union. When the necessary amount of troops had been concentrated, the defendant SHIGEMITSU, the Japanese Ambassador in Moscow, came to the People's Commissariat for Foreign Affairs and demanded the "Zaozernaya" Hill, which had serious strategic importance on the approaches to Vladivostok, to be transferred to Manchoukuo, in other words, to Japan.

SHIGEMITSU claimed that this hill belonged to Manchuria. The Soviet representative submitted the original map attached to the Hunchun Treaty between Russia and China in 1886 which established the frontier between these countries in the said area, and clearly showed that the territory which the Japanese claimed belonged to the Soviet Union.

SHIGEMITSU refused to consider and discuss the map, though according to the established international practice, maps, attached to international treaties, were the generally accepted legal grounds for delimiting frontiers between the states. He said he did not want to busy himself with such trifles as some maps attached to an international treaty, and if Japan and Manchoukwo considered that the Zaozernaya hill belonged to them, then it had to belong to them no matter what was shown on any map. Besides, SHIGEMITSU openly threatened to use armed forces in case the Zaozernaya hill would not be transferred to Manchuria by the Soviet Union on her own free will.

Naturally, the Soviet Government would not yield to such blackmailing on the part of Japan. Then, on July 29, 1938 the Japanese Korean Army units concentrated in the Lake Hassan area, launched an offensive. They partly destroyed the weak frontier-guard outposts of the Soviet frontierguard corps,

located on the Zaozernaya hill and occupied this hill. The Soviet Government was forced to throw the Red Army field units into battle. The Kwantung Army was at that time speedily preparing two divisions which were to march out to help the Japanese Korean Army, but was late in this--the Soviet troops completely routed the Japanese units which seized the Soviet territory and drove them beyond the Soviet frontier.

The Japanese propaganda tried to draw a false picture that events were started by the Soviet frontier guards seizing the Manchurian territory. We shall here submit the evidence, proving two essential facts: First, that the territory which was the objective of the battle actions always belonged to the U.S.S.R., and second, that it was the Japanese troops which made an attack on this section of the frontier, which was held at the time only by small frontier guard outposts of the Soviet frontierguard corps. The Japanese Government knew and approved of this attack. It is quite evident that neither the local military command nor the Japanese General Staff could give directions to the defendant SHIGELITSU, the Japanese Ambassador in Moscow, to hand to the Soviet Government a demand to cede the Soviet territory to Manchuria, threatening otherwise to use armed forces. The diplomatic actions of such kind

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are carried out only under the directives of the Government. SHIGEMITSU himself in his talk with M. M. LITVINOV confirmed that such directives had been given in that case. Therefore, the attempts to take responsibility for this underclared war against the U.S.S.R. from the Japanese Government and put it on the local military command must be categorically rejected. The responsibility for this particular fact of the Japanese aggression against the Soviet Union must be laid on all those who at the time were members of the Japanese Government, and were responsible for its policy, and in particular the defendant HIROTA, who at that time was Foreign Minister, and the defendant SHIGEMITSU.

A witness, TANAKA, Ryikiti examined before this Tribunal stated that the rout which the Japanese troops had suffered in this battle made him think seriously whether the Japanese Army was ready for a Big War.

But the lesson which they had learned at the Hassan Lake did not make the Japanese Government and the leaders of the Japanese Army wiser. In the following year, 1939, they renewed their aggression, this time on the territory of the Mongolian People's Republic, in the Nomon-Gan Area. The Japanese Government and Japanese military command knew well of the existing treaty of mutual assistance between the

Soviet Union and the Mongolian People's Republic. They knew beforehand that an attack on the territory of this Republic would inevitably lead to a clash of arms with the Soviet Union and consciously were ready to do it.

The purpose of the military operations of the Kwantung Army in the Nomongan Area, was to carry out those plans, of which ITAGAKI had spoken in his talk with ARITA, i.e., to secure a military base for the purpose of breaking through onto the Soviet territory in order to cut the Siberian Railroad trunk line and to cut off the Soviet Far East from Russia. This operation was preceded by a thorough preparation. We shall submit to the Tribunal a map published in 1934 by the administrative department of the Kwantung Region, which was directly subordinated to the Commanding General of the Kwantung Army. The frontier between the M.P.R. and Manchuria is shown quite exactly east of the Khalhin-Gol river.

It precisely corresponds to the frontiers, shown in the official Chinese publication of 1919. But a year later, in 1935, the same administrative department published a new map on which the frontier between the M.P.R. and Manchuria was already shown along the Khalhin-Gol river. Thus the whole Nomongan oasis was transferred from the M.P.R. territory onto the Manchurian territory. This oasis had not only economic

importance for the local population, but it could have easily been turned into a military base for a further advance onto the territory of the Mongolian People's Republic.

Thus, the Japanese military and governmental authorities first seized the territory they wished on the map, and then started the actual seizure of this territory.

The military preparations were being carried out this time on a considerable larger scale than in the preceding year. This time the undeclared war against the M.P.R. and the Soviet Union initiated by the Japanese continued for four months and ended in a complete rout of the Japanese armed forces engaged in it.

VG { There are no doubts that the Japanese Government and the Japanese General Staff are responsible for this.

11 { The defendant HIRANUMA admitted that he, being at that time the Prime Minister of Japan, knew about this attack and he alleged that he tried to persuade the defendant ITAGAKI, the then War Minister, to stop this attack, but failed. But HIRANUMA answered in the negative to the question whether he reported to the Emperor on the necessity to stop this war. Besides, a detailed communique on these battles was made in

July 1939 in the official publication "Tokyo-Gazette".
Thus already in July the Japanese Government not only knew but officially informed of this undeclared war. In spite of the fact the war continued after this for more than two months. Such fact could not have taken place if the Government would not have approved of the war.

The Japanese propaganda falsifying all the circumstances under which this attack of Japan on the M.P.R. territory took place, tried to present these events as an unsuccessful attempt of the Mongolian troops to invade the Manchurian territory which was "victoriously repulsed by the glorious Kwantung Army." It is quite evident that this fabrication is absolutely ridiculous, the direct result of the Nomongan area events for the "Glorious Kwantung Army" was that General UEDA, the Commanding General of that army, and all his principal staff officers were discharged, probably as a reward for "the victory gained by them."

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This proves, by the way, that the initiators of the Japanese aggression working in Tokyo could, when they wanted, discharge the Kwantung Army Command. The point is that they used such a drastic measure not as a punishment for the aggression, but as a punishment for failure to spread this aggression.

Not less ridiculous are the statements that the

troops of the small M.P.R. attacked the Japanese armed forces. As far as the Soviet troops are concerned, it will be clear from evidence which we shall submit to the Tribunal, that the clash of the Japanese forces with the Red Army units took place on the western bank of the Khalhin-Gol river, i.e., on the territory which even according to the fabricated Japanese map belonged to Mongolia. The above said maps which we shall submit to the Tribunal will prove beyond any doubt not only the falsity of the statements of the Japanese propaganda, but also the fact that aggressive attack of Japan was thoroughly thought over and prepared beforehand and has all features of a premeditated and willful crime.

All the defendants must bear responsibility for the initiation of this undeclared war because this concrete fact of aggression as well as the one mentioned above, is only one of the manifestations of that general plan or conspiracy in which they all participated, but HIRANUMA, the then Prime-Minister, and ITAGAKI, the War-Minister, are the first to be responsible for this concrete fact.

The complete rout of the Kwantung Army selected units in the Nomongan area showed to the Japanese militarists that Japan alone could not fight the U.S.S.R. down and the leaders of the Japanese ag-

gression began with ever increasing lust to look at the German mailed fist under the stroke of which the democratic countries of Europe--Czechoslovakia, Poland, Norway, Denmark, Netherlands, Belgium, France were falling in turn.

However, in the political situation of summer 1939, Germany considered it advantageous for herself to make a proposal to the Soviet Union to conclude a non-aggression pact. The U.S.S.R. thought it possible to accept this proposal, following her policy of consolidating peaceful relations with all countries, which would maintain the same relations with the Soviet Union.

It is known that this treaty was later on treacherously violated by Germany who, on June 22, 1941 attacked the Soviet Union.

As the Japanese Government headed by the defendant HIRANUMA was conducting negotiations on concluding a military alliance with Germany mainly for the purpose of an immediate joint attack against the U.S.S.R., they rashly interpreted the conclusion of the pact with the U.S.S.R. as a "betrayal" by Germany of the principles of the anti-Comintern pact and as a rejection of a military alliance with Japan.

In connection with that the defendants OSHIMA and SHIRATORI who were at that time the Japanese

Ambassadors in Berlin and Rome and who as it has already been said above, actively worked for the conclusion of the alliance between Japan, Germany and Italy, resigned their posts as a matter of demonstration thus closely connecting their personal fate with the fate of organization of conspiracy against democratic countries and against the U.S.S.R. in particular. The defendant HIRANUMA, guided by the same considerations also resigned the post of Prime-Minister. He also thought that the conclusion of alliance with Germany and Italy directed against the U.S.S.R. was the basic political task of the Government headed by him and interpreted the unsucccess in this question as a political failure of his cabinet and himself personally.

However, later on the aggressive clique, which directed the Japanese policy clearly understood that concluding the pact with the U.S.S.R., Germany was guided by considerations of purely temporary political situation, and in no way abandoned her aggressive aims or betrayed the common cause of the aggressors and the "principles" of the anti-Comintern pact. On this basis, in the summer of 1940, the negotiations between Germany and Italy on the one side and Japan on the other on the conclusion of a military and political alliance were renewed. On

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September 27, 1940 these negotiations resulted in a conclusion of the tri-partite pact, which gave final shape to the conspiracy of aggressive powers against the democratic world and against the U.S.S.R. in particular. This pact was submitted to the Tribunal. (Exhibit No. 43). A number of criminal acts of a large international scale were the fruits of this conspiracy. We contend that the Soviet Union from the very beginning was considered to be one of the victims of this conspiracy and that practical realization of this conspiracy caused considerable damage to the interests of the Soviet Union.

It is very significant that at that time the defendant OSHIMA returned to the post of the Japanese Ambassador in Berlin and received a fully deserved decoration from Hitler, the leader of the international gang.

The nature of the tri-partite pact was in conspiracy of aggressors for the purpose of establishing the so-called "new order" throughout the world and in estimation of the share of the booty for each of them. By the moment of the signing of the pact, the action of Germany in Europe and of Japan in China had already shown in practice that both countries understood this "New Order" in the same way, as

enslavement of peaceful people, racial and national oppression, mass shooting of civilian population, looting of the seized territories, extraction of the roots of democracy in the conquered states.

Naturally, the pact proclaiming the establishment of the regime of looting and violence throughout the world to be its purpose, was directed against all democratic countries, which could not stand the realization of this most dangerous Japanese German doctrine, the realization of which could have made victims of any democratic country and finally of all the democratic world.

The leaders of the Japanese aggression understood well that creating a bloc of fascist, aggressive states, whose purpose was to forcibly establish the "New Order", they split the world into two camps; the bloc of aggressors on the one side and all other countries on the other.

We shall submit to the Tribunal documentary evidence which will prove that Tojo in particular understood the situation precisely in this same way.

Many of the leaders of the Japanese aggression (KONOE, MATSUOKA and others) several times attempted to depict the period which followed the end of the Nomongan area events as a period during which Japan, as alleged, used all her force to adjust re-

lations with the U.S.S.R. They tried to represent it in the folloing way: That if at the first stage of negotiations between Japan and Germany in 1938-1939 the point of their alliance was actually to be directed against the U.S.S.R., at the second stage of these negotiations in 1940 the point of the alliance, as they alleged, was turned only against the USA and Great Britain. Regarding the U.S.S.R. the tri-partite pact, on the contrary, was as they said, to be an instrument of "adjusting" that Japano-Russian relations. They quote as proof of the statement, the 5th count of the pact, in which it was said that the pact did not encroach upon the political status which existed at that time between each of its signatories and the U.S.S.R.

As far as the 5th count of the pact is concerned we have no need to go far to explain the meaning of its contents. Such explanation was given by Foreign Minister MATSUOKA on September 26, 1940 at the meeting of the Privy Council called to study the question of concluding the tri-partite pact. We shall submit to the Tribunal the minutes of this conference.

He explained during that conference that although a non-aggression treaty between the U.S.S.R. and Germany existed, Japan would back Germany in

case a war between Germany and the Soviet Union started, while Germany would help Japan in case of a clash between Japan and the U.S.S.R. Concerning Count 5 which said that the pact did not encroach upon the political status existing at that time between each of the three signatories of the agreement on the one hand and the Soviet Union on the other, MATSUOKA explained that this count did not mean that the existing attitude of the Soviet Union could not be changed. It simply meant that the pact under review did not attempt to change it.

It is true that at the same conference MATSUOKA also said that it would do no harm to improve the Russo-Japanese relations in the future. But again at the same conference MATSUOKA directly emphasized that even if the improvement of the Russo-Japanese relations would take place, it would scarcely last for more than three years and in two years it would be necessary to reconsider the relations between Japan, the Soviet Union and Germany.

We contend that Count 5 was included into the tri-partite pact at that moment according to the tactical considerations of the participants of the pact, its purpose was not to arouse suspicion and alarm on the part of the U.S.S.R. In Japan and in Germany certain endeavors were made with this aim in view.

Kurusu, the Japanese Ambassador in Berlin,
wired to Tokyo to MATSUOKA on September 26, 1940
(on the eve of the conclusion of the pact) that
Germany intended to instruct her newspapers to em-
phasize that the pact did not mean a war against the
U.S.S.R. But in the same cable Kurusu informed the
Japanese Government of the fact that Germany con-
centrated her troops in the East with the purpose of
checking the U.S.S.R.

At the same time in Japan, Prime-Minister
Kono, Foreign Minister MATSUOKA and other persons
also said in their official speeches that the pact
was to lead to "the adjustment of the Japano-Russian
relations."

The Hitlerite Germany was interested that one
more ally-Japan, which was akin to her by spirit and
by method of actions should join her company.

Therefore, Germany, taking into consideration
the fact that the question of the Soviet-Japanese
relations had a special actuality for Japan, did not
stop before beguiling Japan by promises to bring
pressure on the Soviet Union to adjust the relations
between the U.S.S.R. and Japan in the way Japan wished
them to be.

We shall submit to the Tribunal evidence which
will prove beyond any doubt that the actual meaning

of the tri-partite pact in the aspect of the Soviet-Japanese relations was understood by the leaders of the Japanese Aggression in the following way:

1. Should the war between Germany and the Soviet Union break out, the pact would furnish an opportunity for Japan herself to seize the Soviet territories that provoked the Japanese appetite for a long time;
2. In case there was no war between Germany and the Soviet Union, they would have to try and threaten the Soviet Union with the German mailed fist, since their own Japanese fist had proved to be not in the least terrifying to the Soviet Union.

These calculations did not seem to be in any way erroneous to the Japanese imperialists, and their only mistake was that the German military machine also broke to bits at the impact with the military power of the Soviet Union.

THE LAST PERIOD UNTIL THE SURRENDER OF JAPAN

As it is known, on April 13 MATSUOKA signed on behalf of Japan the neutrality pact with the U.S.S.R.

The evidence which we shall submit to the Tribunal will show that concluding this pact the Japanese Government did not intend to follow it and immediately violated it when Germany attacked the Soviet Union. We shall also submit to the Tribunal

evidence which will prove that Japan did not attack the U.S.S.R. at that time only because the situation in the summer 1941 did not seem to the leaders of the Japanese aggression to be quite suitable.

The Japanese imperialism fell a victim to its own gross greediness. The leaders of the Japanese aggression, TOJO, MATSUOKA, HIRATUMA, UMEZU and others, who determined the Japanese policy at that critical period, found themselves in the position which is well defined in the proverb, "He that hunts two hares will catch neither".

We shall present the evidence hereafter that signing the Neutrality Pact with the Soviet Union on April 13, 1941, MATSUOKA was well aware of Germany's preparations for an attack on the Soviet Union and that simultaneously with the negotiations on the conclusion of the Neutrality Pact with the U.S.S.R., he raised the question before Ribbentrop of the prolongation of the Anti-Comintern pact for another five years, the term of the said pact expiring on November 26, 1941. The prolongation is known to have been effected, when the Soviet-German war was in full swing, and the existence of the Neutrality Pact with the U.S.S.R. formed no obstacles by any means.

The evidence which we shall submit to the Tribunal will show that signing the Neutrality Pact with the Soviet Union and being aware of Germany's

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attack on the Soviet Union in the nearest future,
Molotov hoped he would be able to deceive the
Soviet Government and reckoned that as soon as the
war with Germany broke out, the Soviet Union relying
on the Pact, would transfer all her forces from the
Far East to the Western front and then the whole of
the Eastern Siberia together with Maritime Province
would easily fall into the hands of Japan.

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But the attempt failed. Though going through
extreme hardships on the western front during the
first months of the war against Germany, the Soviet
Union did not weaken her defense in the Far East,
notwithstanding the fact that in July-August 1941
the Japanese Government repeatedly assured the
U.S.S.R. of her firm desire to observe the Neutrality
Pact.

Now we have at our disposal documentary evidence
of the fact that the Japanese Government, giving such
assurances, strove to appease the vigilance of the
Soviet Government and to make it withdraw its troops
from the Far East, and were at the same time fever-
ishly preparing for a military attack against the
U.S.S.R.

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The Tribunal already knows that on July 2, 1941
at the conference of the main military and political
leaders of Japan in the presence and under the

chairmanship of the Emperor the decision was taken
to make everything to settle the Chinese Incident,
to speed up the advance to the south and, taking into
consideration the circumstances, to settle the
Northern problem, and they intended to remove all
obstacles for the achievement of these aims.

We shall submit to the Tribunal evidence which
will prove that the following decision was also
made at the conference:

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1. Japan would not enter into the war with the
U.S.S.R. only "for the time being" and would use
arms "if the German-Soviet war goes on in a way
advantageous for Japan."
 2. Till that time Japan would "secretly carry out
military preparations against the U.S.S.R." under
the cover of diplomatic negotiations.

Following this decision the Japanese General
Staff and the Kwantung Army Headquarters worked
out a special plan of secret mobilization under
the ciphered title of "Ken-Toku-En" which meant --
"special maneuvers of the Kwantung Army". According
to this plan the strength of the Kwantung Army was
to be doubled during two months increasing from
300,000 men to 600,000 men. This plan was carried
out in a great hurry. The slogan: "Not to miss
the bus" was popular among the Japanese military
at that time.

The Germans promised to rout the Soviet Union no later than in two months, and the Japanese leaders thought in the following way: What is the use of rushing headlong and suffering losses in the fight against the Red Army; besides, there is no oil in the Eastern Siberia which we need. We shall meanwhile capture everything we need in the South, and by the autumn, when the Germans defeat the Red Army, and disorganization would reign in the Soviet Union, we shall easily take everything we want. And meanwhile we shall carry on diplomatic negotiations, shall swear to be true to the neutrality pact in order to deceive the Soviet Union and to hide from her military preparations.

That was the reason of the Japanese Government concluding the Neutrality Pact with the Soviet Union, and that was the way in which they were going to carry this into effect.

The Japanese Government was afraid only that the war between the Soviet Union and Germany would end in the victory of Germany earlier than Japan would be able to concentrate forces necessary for seizure of the Eastern Siberia. This was directly confirmed by the cable sent from Tokyo to Berlin for the information of the Japanese Ambassador. We shall submit this cable to the Tribunal. The cable says

that the Russo-German war has given to Japan an excellent opportunity to settle the Northern question and that Japan is proceeding with her preparations to take advantage of this occasion. The cable also expresses apprehension that in case the Russo-German war proceeds too swiftly Japan will not have time to take effective joint action. The Japanese Government was afraid "to miss the bus."

But in this case also the hopes of the Japanese politicians did not come true. Their aggressive appetite was far more than their actual power.

The time went on. Two, three months passed but the rout of the Red Army and disorganization of the Soviet State did not come. OSHIMA came to Ribbentrop to make a complaint on this. Ribbentrop called Keitel and the latter ardently was trying to convince OSHIMA that everything was all right, that a certain delay in the calendar plan of the German-Soviet war was due to simple technical reasons, which would be easily overcome.

The Japanese leaders again believed the German explanations and decided that it was advisable to wait a bit more and not to attack the Soviet Union.

We shall submit evidence that in August 1941 the attack against the Soviet Union was already postponed until summer 1942 and it was planned to include all

Eastern Siberia into the area of the so-called
"Greater East Asia."

The borders of this "Greater East Asia" which, according to the tri-partite pact was given to Japan, were considered by leaders of the Japanese aggression as something very flexible.

At the second conference of the Privy Council on October 12, 1942 at which the question of creating the Ministry of the East Asia Affairs was discussed, TOJO was asked what were the borders of the Greater East Asia sphere.

Answering this question TOJO named the territories which by that time had already been seized by Japan and added that the regions occupied in the course of the war would be included in this sphere and it would be extended together with the extension of occupied areas.

UC } In other words, all that was possible to swallow was to be included into the Greater East Asia. We shall submit to the Tribunal the documentary evidence of the fact that the Japanese planned to swallow all the Soviet territories which would not be swallowed by Germany. Thus they planned to divide the trans-Siberian trunk line in the following way: Everything west of Omsk-to Germany, everything east of Omsk-to Japan.

In 1941-1942 not only operation plans of an attack against the Soviet Union, but also the plans of military administration on those territories, which they planned to seize, were being drawn up in Tokyo. We shall submit these plans to the Tribunal.

VG They will show how the Japanese racial theory was supposed to be carried into effect, how the mass transmigration of the Japanese into the occupied territory was being planned, and how special measures were worked out to prevent the Slavs "driven from the West" from concentrating in Siberia. All these plans and calculations were based on the strong belief in the final victory of Germany.

There are very many intelligent people who are astonished and not without reason, at Japan daring to attack both the U.S.A. and Great Britain having the unfinished war with China on her hands, and preparing for an attack on the Soviet Union. This puzzling problem cannot be solved if we lose sight of this implicit faith of Japanese rulers in general, and military leaders in particular in German power and inevitable German victory. They hoped that Moscow and Leningrad would fall any day, that the collapse of the Soviet Union long ago promised by the Germans would not be long in coming.

On December 8, they repeated in Pearl Harbor, as I have already mentioned, what their predecessors had

done in Port Arthur over 35 years ago. Several days after the Japanese attack on Pearl Harbor, the Red Army began its counter-offensive near Moscow and Hitlerite bands rolled back to the West. This was the first big military defeat of Germany, but even this did not put the Japanese would-be strategists wise. They continued to believe in the power of the Hitlerite Germany and in "invincibility" of the German Army.

Faith in the ultimate victory of Germany and in the defeat of the Red Army was a condition sine qua non which figured in all calculations of Japanese politicians when they elaborated their aggressive plans directed not only against the Soviet Union but also against the U.S.A. and Great Britain.

But their hopes failed!

At the beginning of the war, to be sure, the aggressor, due to the surprise attack usually attains some temporary success over his peaceful opponent; he is ready to fight while his victims are not; he chooses the time and place of the blow.

But comparatively soon the influence of the surprise factor decreases and the permanent war factors enter into action. It was so in the war of Germany against the Soviet Union and in the war of Japan against the U.S.A. and Great Britain.

The time went on but the victory of Germany in Europe and of Japan on the Pacific Ocean did not come. On the contrary, the Japanese army forces were more and more entangled in the war, and the Red Army firmly held the Soviet frontiers as before and that convenient occasion for an attack against the U.S.S.R., which was expected all the time by the Japanese strategists, did not come.

Does it mean that Japan, although not voluntarily, still kept within the limits of the neutrality pact with the Soviet Union?

No, it does not mean that. She purposely and systematically was violating this pact and was rendering considerable help to Germany; notwithstanding the growing difficulties on the other fronts, Japan more and more increased her armed forces on the Soviet frontiers. In 1942, 1,100,000 troops were concentrated in Manchuria, i.e., about 35% of the Japanese army on the whole, including the best tank and air units. What was it done for? Were there any reasons for Japan to be afraid of an attack of the Soviet troops?

We could have answered this question in the negative not needing any evidence to do this, but we have direct evidence that no such apprehension troubled the Japanese leaders.

The prosecution will submit to the Tribunal operation order to the Japanese Navy of November 1, 1941, an order in which operation instructions on an immediate attack against the U.S.A. and Great Britain were given. This order, signed by Admiral Yamamoto Isooky, the Commanding Admiral of the Joint Japanese Navy stated among other things that, although the strength of the Soviet armed forces on the borders between the Soviet Union and Manchuria was very great it was believed that the Soviet Union would not commence hostilities if Japan herself would not attack the Soviet Union.

It follows then that the Japanese Government did know that the Soviet Union had not intentions to make an attack on Japan; the Japanese Government kept an army million men strong on the Soviet borders not in self-defense, but in order to render help to Germany, and secondly-- not to miss her chance if, in spite of all, Germany managed to gain victory over the Soviet Union.

Germany acknowledged and appreciated that help rendered to her by Japan, Ribbentrop made it clear in his telegram to the German Ambassador in Tokyo dated May 15, 1942, in which he wrote, that the moment was very convenient for Japan to seize the Soviet Far Eastern area. But it should be done only if Japan was sure of her success and if

V-8 } she had not enough forces to conduct successfully such operations, it was better for her to maintain neutral relations with Soviet Russia. Ribbentrop emphasized that that also relieved the "toil" of Germany because Russia in any case had to keep troops in the Eastern Siberia to prevent the conflict with Japan.

X { Had Japan honestly observed her Neutrality Pact with the Soviet Union, had she not made the Soviet Union keep strong armed forces on the border of Manchuria, as the Japanese High Command itself had admitted,--the U.S.S.R, would be also able from the very outset to utilize those forces in the war against Germany. That would have changed not only the whole course of the Russian-German War, but in all probability, the whole course of World War II would have been entirely different. As to the Russian-German war, it would without the slightest doubt have ended much sooner and with lesser sacrifices on the part of the Soviet Union.

Hundreds of Soviet cities, that now have to be rebuilt from the ruins, would have remained intact. Hundreds of thousands, perhaps millions of the Soviet people, who had been killed in the war against Hitlerite invaders, would have been living. That is why Ribbentrop declared that "Japan makes our toil lighter," sacrilegiously applying the word "toil" to

the mass extermination of Soviet citizens and to the destruction of Soviet cities and villages.

X { It is true on the other hand that had the million army with all its fighting equipment which the Japanese Government and High Command had kept during the whole war in Manchuria, been thrown into battle in the Philippines, the New Guinea and at other fronts,--the task of the Allied armies at these fronts certainly would have been much harder. But that could not in any way mitigate the guilt of the accused. We shall also submit to the Tribunal evidence proving that when in Japan they had become conscious of the change in the course of the Russian-German war, unfavorable for Germany, the Japanese politicians planned to mediate between the Soviet Union and Germany with the aim of making the Soviet Union conclude separate peace treaty with Germany, on terms favorable to Germany, by threatening to attack the Soviet Union. These plans, as many other plans of the Japanese Government, came to nothing, but they present certain interest for they are instances of Japan's collaboration with Germany.

Japan violated the Neutrality Pact with the Soviet Union not only by keeping her picked troops on the Soviet borders all the time; but we shall submit to the Tribunal numerous evidences which will

X { prove that in the course of the war Japan transferred to Germany military information on the Soviet Union which deserved expressions of gratitude from Ribbentrop. It is very important to point out that this information was transferred to Germany not by separate individuals (the Japanese Government might not be responsible for that) but by the Japanese governmental officers. The Japanese diplomatic representatives in the U.S.S.R. gathered this information and the Japanese General Staff and the Japanese Embassy in Berlin transferred it to Germany.

X { We shall present evidence proving that Japan sank Soviet ships, the ships belonging to the country neutral, as regards Japan, and did all she could to hamper the Soviet shipping in the Far East. By doing so Japan also considerably helped Germany, for she hampered the transport of the materials the Soviet Union needed.

In view of the aforesaid assistance which Japan systematically had been giving to Germany, and also in view of the fact that Japan had started the war against the Allies of the U.S.S.R., i.e., against the United States of America and Great Britain--the Neutrality Pact, signed on April 13, 1941, became meaningless.

That is why the Soviet Union had to denounce the

Pact, as soon as the time of denunciation, provided for in Article 3 of this pact, came.

Japan fought on the side of the axis powers, tooth and nail. The Hitlerite bandits in Germany, the fascist murderers in Italy and the Japanese imperialists who are now in the dock, were worthy brothers in spirit.

We shall submit to the Tribunal evidence which proves that up to 1945 the leaders of the Japanese gang of aggressors were making assurances to their German accomplices that they were true and loyal to their criminal conspiracy and were doing all they could to ensure success of this conspiracy.

Even in January, 1945, when the German troops were already thrown out of the Soviet territory, when the Red Army was on the Oder and the Allied Anglo-American troops -- on the Rhine, the accused SHIGEMITSU making a speech at the 86th session of the Diet said that the contact between the Empire and her allies was becoming still stronger and that Japan together with her allies will carry on this war to the end.

Germany was defeated and capitulated unconditionally on May 9, 1945. Even to the Japanese politicians who many times demonstrated their political shortsightedness and to the ill-starred Japanese strategists who not for a single time made true

prognostication concerning the course of operations it became clear that it was all over with the "New Order" in Europe once and for all. But even after this they refused to surrender arms, to admit that their aggressive plans had failed and to give up those plans once and for all. They believed that having a fresh selected army in Manchuria and considerable forces on the Japanese Islands they could bargain and not only save their skins but preserve means for planning and preparing a new war of aggression and again to wait for an opportunity to attack the peaceful country whose vigilance became slack and which would fall an easy victim to the aggressor. They hoped that the democratic countries tired after the protracted war would swallow this bait.

That is why they rejected the Potsdam declaration which called Japan to surrender unconditionally. They appealed to the Soviet Government to mediate. The mediation meant negotiations and negotiations with such a trump in the hand as a many million army untouched by fight could give them opportunity of gaining much by bargaining and of saving much.

But the democratic countries being taught by bitter experience stoutly defended their decision to make no bargains with the aggressor. They could agree to nothing but unconditional surrender, which the Japanese Government refused. This refusal meant

the prolongation of the war for an indefinite time.

That was why the Soviet Government rejected the request of the Japanese Government for intermediation, as having no ground, and declared a war against Japan, according to the request of the allies the U.S.A. and Great Britain, being true to her duty as an ally and wishing to accelerate by all means the end of the war, during which the blood of people was shed for six years.

The Soviet Union doing this also pursued the following aim: To give the opportunity to the Japanese people of avoiding those dangers and devastation, which were suffered by Germany after she had refused the unconditional capitulation.

It turned out that the devastating blow of the Red Army against the selected Japanese troops concentrated in Manchuria, was necessary for the Japanese imperialists to realize at last that they were defeated in the war. They realized that they were defeated and it was difficult not to realize this in the situation in which Japan routed and surrounded from all sides found herself, but they did not admit till now, and do not want to admit, that they had committed a crime. They all as one declared here in the court that they were guilty of no crime. This stresses once more the fact that if they would have

been left free, if necessary means would have been in their hands, they would have acted in the same way as they had acted before.

I beg to allow me now to introduce to the Tribunal Assistants of the Prosecutor for the Soviet Union who will submit to the Tribunal the evidence of the prosecution: Colonel Rosenblit, Chief Assistant of the Judge-Advocate General of the U.S.S.R. Armed Forces; Colonel Ivanov, Chief of the Investigation Department of the U.S.S.R. Ministry of the Armed Forces; Major-General Tadevosyan, Assistant of the Attorney General of the U.S.S.R.; and Major-General Vasilyev, District Attorney of the City of Moscow.

Colonel Rosenblit, Chief Assistant of the Judge-Advocate General of the U.S.S.R. Armed Forces is first to have the floor.