

FRI

Oct 18

Record of Proceedings  
of the  
INTERNATIONAL MILITARY TRIBUNAL  
FOR THE FAR EAST

Court House of the Tribunal  
War Ministry Building  
Tokyo, Japan

Soviet

The United States of America, the Republic of China,  
the United Kingdom of Great Britain and Northern Ireland,  
the Union of Soviet Socialist Republics, the Commonwealth of  
Australia, Canada, the Republic of France, the Kingdom of  
the Netherlands, New Zealand, India, and the Commonwealth  
of the Philippines

-Against-

ARAKI, Sadao; DOHIHARA, Kenji; HASHIMOTO,  
Kingoro; HATA, Shunroku; HIRANUMA, Kiichiro; HIRO-  
TA, Koki; HOSHINO, Naoki; ITAGAKI, Seishiro; KAYA,  
Okinori; KIDO, Koichi; KIMURA, Heitaro; KOISO, Kuni-  
aki; MATSUI, Iwane; MATSUOKA, Yosuke; MINAMI,  
Jiro; MUTO, Akira; NAGANO, Osami; OKA, Takasumi;  
OKAWA, Shumei; OSHIMA, Hiroshi; SATO, Kenryo; SHI-  
GEMITSU, Mamoru; SHIMADA, Shigetaro; SHIRATO-  
RI, Toshio; SUZUKI, Teiichi; TOGO, Shigenori; TOJO,  
Hideki; UMEZU, Youshijiro;

-Accused-

Official Court Reporters

Jack Greenberg, Chief  
Fred T. Abram  
James F. Barton  
Antoinette Duda  
Samuel Goldberg  
Robert B. Morse  
John J. Smith  
Daphne Spratt  
Elvira Whalen  
Julian Wolf  
Lorraine Yelden



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## I N D E X

Of

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# I N D E X

Of

EXHIBITS

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1 Friday, 18 October, 1946

2 - - -

3  
4 INTERNATIONAL MILITARY TRIBUNAL  
5 FOR THE FAR EAST  
6 Court House of the Tribunal  
7 War Ministry Building  
8 Tokyo, Japan

9 The Tribunal met, pursuant to adjournment,  
10 at 0930.

11 - - -

12  
13 Appearances:

14 For the Tribunal, same as before.

15 For the Prosecution Section, same as before.

16 For the Defense Section, same as before.

17  
18 - - -

19  
20 (English to Japanese, Japanese to  
21 English, Russian to English and Japanese to  
22 Russian interpretation was made by the  
23 Language Section, IMTFE.)  
24  
25



1 MARSHAL OF THE COURT: The International  
2 Military Tribunal for the Far East is now in session.

3 THE PRESIDENT: Minister Golunsky.

4 MR. GOLUNSKY: If the Tribunal please,  
5 about the names of those two sailors killed on those  
6 ships, I have verified the whole matter and it shows  
7 that there is no mistake in translation and, as it  
8 appears from the document, the situation is this.  
9 On the seas December 18 the ship "Svirstroy" was  
10 shelled by Japanese and two men, Kovernikov and  
11 Elagin, were killed. This is exhibit 819.

12 As for the second ship, "Sergey Laso,"  
13 mentioned in the exhibit 820, it was not shelled;  
14 it was only bombed from the airplanes and nobody was  
15 killed during this bombing on this ship. After this  
16 the crews of all the ships were brought ashore and  
17 pooled together, and when they were ashore a shell  
18 from an English ship broke into the house where they  
19 lived and two men, Krivoruchko and Bochko, were  
20 killed by that shell. The document does not show  
21 from which ship those two men were but their names  
22 are mentioned in both exhibits, 819 and 820.

23 With the Tribunal's permission, I would  
24 like to take another matter up now about the document  
25 2462.



THE PRESIDENT: Mr. Blewett.

1 MR. BLEWETT: If the Court please, on the 16th  
2 I objected to the admission of document 2462 on the  
3 ground that no rule had been requested for the admis-  
4 sion of the excerpt.

5 THE PRESIDENT: That number does not recall  
6 the document to me. Has it been admitted?

7 MR. BLEWETT: It was refused, your Honor.  
8 We have now checked the newspaper from which this is  
9 an item and, while there may be other objections sus-  
10 tained as to the introduction, to save time, I shall  
11 withdraw my objection to its admission.

12 THE PRESIDENT: Major Furness.

13 MR. FURNESS: If the Court please, at the  
14 close of yesterday's proceeding the prosecutor made  
15 a statement which appears on page 8054 of the record.  
16 I quote: "I conclude my statement with a presentation  
17 of several documents proving that up till 1945, in-  
18 clusive, the Japanese Government, including the  
19 defendants TOJO and SHIGEMITSU, repeatedly proclaimed  
20 their loyalty to the alliance with Hitlerite Germany."

21 Following that statement there was intro-  
22 duced into evidence as exhibit 825, a document dealing  
23 with economic agreements between Germany, Italy and  
24 Japan, dated January 21, 1943. I wish to deny any  
25



1 implication that SHIGEMITSU had anything to do with  
2 these agreements and call attention to the fact that  
3 exhibit 123 shows that he did not become Foreign  
4 Minister or part of the Government until April 20,  
5 1943.

6 THE PRESIDENT: Yes, General Vasiliev.

7 GENERAL VASILIEV: I shall present in evi-  
8 dence the text of this statement of the defendant  
9 TOJO, the then Prime Minister, on the occasion of  
10 the declaration of war by Germany and Italy on the  
11 United States of America and of the conclusion by  
12 Japan of the military agreement with Germany and  
13 Italy. This statement was published in the newspaper  
14 "Asahi" on December 12, 1941, document No. 2462. At  
15 the same time I present for identification this news-  
16 paper in a file for December, 1941.

17 THE PRESIDENT: Admitted on the usual terms.

18 CLERK OF THE COURT: Prosecution's document  
19 No. 2462 will be given exhibit No. 826 for identifica-  
20 tion only and the excerpt therefrom bearing the same  
21 document number will be given exhibit No. 826-A.

22 (Whereupon, prosecution's document  
23 No. 2462 was marked prosecution's exhibit No.  
24 826 for identification; the excerpt therefrom  
25 was marked prosecution's exhibit No. 826-A and



was received in evidence.)

1           GENERAL VASILIEV: I quote an excerpt from  
2 TOGO's statement:

3           "The world is now divided into two groups;  
4 one that vainly struggles to maintain the status quo,  
5 and the other, who earnestly strives to establish the  
6 rightful new order; and they are fighting the greatest  
7 battle that has ever occurred in history.

8           "With just cause and substantial power, I  
9 believe without doubt victory is ours.

10           "I now offer my hearty congratulations on  
11 the alliance of the three countries in becoming  
12 stronger than ever, and herewith express my firm belief  
13 in our glorious future."

14           The second document showing the tenacity  
15 in the realization of aims of the conspiracy and the  
16 unity in aggressive war of the German-Italian-  
17 Japanese bloc is a radio address of the defendant  
18 SHIGEMITSU made on September 27, 1943, on the occasion  
19 of the third anniversary of conclusion of the Tri-  
20 partite Pact. The text of this speech has been taken  
21 from a symposium of Official Announcements Concerning  
22 Foreign Relations. The entire publication has already  
23 been presented by me for identification and two pub-  
24 lished speeches concerning the question under  
25



1 consideration are presented in evidence, exhibit  
2 773-A.

3 I quote brief excerpts from this speech  
4 containing the gist of the matter, page 1 of the  
5 English text:

6 "We are marching forward toward the fulfill-  
7 ment of our great mission with an unfaltering spirit  
8 regardless of what happens on the way. No matter to  
9 what machinations and maneuvers Britain and America  
10 may resort in order to induce the Badoglio regime to  
11 fresh acts of betrayal and bad faith, the Axis  
12 Alliance remains unshaken. The Pact of Alliance  
13 shines forth as brightly as ever to illumine our  
14 road to victory."

15 I omit a few lines.

16 "It is because our very existence was  
17 actually endangered that we have at last taken up  
18 the sword. Indeed, this war is to us no other than  
19 a war of self-defense. This is precisely the reason  
20 why we have steeled our determination to fight it  
21 through until we gain the ultimate victory."

22 The third document which I present in  
23 evidence on this same issue is a speech of the  
24 defendant TOJO, the then Prime Minister, made on  
25 April 15, 1944, at a meeting of Mixed Specialists



1 Commission convened in accordance with the provisions  
2 of the Tripartite Pact. This document, No. 2461-A,  
3 is a file of the newspaper "Asahi Shimbun" for April  
4 1944 which I present for identification, while the  
5 text of TOJO's speech published in the newspaper  
6 "Asahi" on April 16, 1944, I tender in evidence, as  
7 I have said already.

8 CLERK OF THE COURT: Prosecution's document  
9 No. 2461 will receive exhibit No. 827 for identifica-  
10 tion only.

11 (Whereupon, the document above  
12 referred to was marked prosecution's exhibit  
13 No. 827 for identification.)

14 THE PRESIDENT: The speech is admitted on  
15 the usual terms.

16 CLERK OF THE COURT: And the excerpt there-  
17 from, to-wit, prosecution's exhibit No. 2461-A will  
18 receive exhibit No. 827-A.

19 (Whereupon, the document above  
20 referred to was marked prosecution's exhibit  
21 No. 827-A and was received in evidence.)

22 GENERAL VASILIEV: I quote a few excerpts  
23 from this speech:

24 "They have mobilized their full force and  
25 are now pressing the borders of the Axis territories--



1 in the East and the West. Despite their efforts our  
2 strong and solid camp has not even shown the slightest  
3 stir. The firm conviction of ultimate victory and  
4 the undefeatable positions of Japan, Germany and Italy  
5 have been all the more strengthened.

6 "I am always paying my respects to the brave  
7 and courageous fight put up by the Germans and  
8 Italians in Europe; \*\*\*. Through the complete  
9 cooperation given in war efforts by the countries  
10 and nations within the Greater East Asia Sphere, and  
11 the utilization of the abundant important resources  
12 for armaments, our position of ultimate victory is  
13 being strengthened day by day. Our Empire will  
14 maintain this position to the last, and resolutely  
15 deal blows to the enemies and thereby fight through  
16 this war to the end."

17 I continue to quote page 2 of the English  
18 text:

19 "Even though battle fields may be apart,  
20 to the east and the west, the necessity arises for  
21 us, the Axis nations, to cooperate and concert much  
22 more closely and to increase our fight against our  
23 common enemies, America and Britain.

24 "To meet this situation, Japan must carry  
25 on connections with the countries of Germany, Italy



1 and the other Axis nations in Europe on a closer  
2 basis, and smash all Anglo-American plots to segre-  
3 gate Japan from the other Axis nations. We will  
4 then be able to advance together towards the achieve-  
5 ment of common objective and thus, with the collabor-  
6 ation of Europe and Asia, gain the ultimate victory."

7 The fourth document on the same issue is a  
8 congratulatory telegram sent by SHIGEMITSU on December  
9 11, 1944, to Ribbentrop and Mussolini on the occasion  
10 of the third anniversary of signing the military  
11 alliance. The telegram was published in the news-  
12 paper "Nippon Times" on December 12, 1944. I present  
13 this number of the "Nippon Times" in a file for  
14 identification and the text of the telegram in  
15 evidence, document No. 2528.

16 CLERK OF THE COURT: Prosecution's document  
17 No. 2528 will receive exhibit No. 828 for identifica-  
18 tion only.

19 (Whereupon, the document above  
20 referred to was marked prosecution's exhibit  
21 No. 828 for identification.)

22 THE PRESIDENT: The excerpt is admitted  
23 on the usual terms.

24 CLERK OF THE COURT: And the excerpt there-  
25 from bearing the same prosecution documentary number



will receive exhibit No. 828-A.

(Whereupon, the document above referred to was marked prosecution's exhibit No. 828-A and was received in evidence.)

GENERAL VASILIEV: I quote brief excerpts from the telegram containing the gist of the matter:

"I also recall that on December 11, 1941, the three nations, concluding a new treaty, firmly pledged themselves to fight out the common war until final victory and simultaneously clarified again to the world their common ideal of establishing a new world order."

I omit a few lines.

"For three years since then, the Armed Forces of the three nations have achieved numerous brilliant war results in the various battlefields of the east and west."

I continue to quote on page 2:

"We firmly believe that after all Europe will be saved by Hitler and Mussolini.

"The war situation in Greater East Asia as everyone knows, has today entered the decisive stage. Confident of final victory both on the first line and on the home front, we are fighting this decisive war to a finish."



1 I omit a few lines. Quote at the bottom  
2 of page 2:

3 "Undoubtedly the decisive war is progressing  
4 in our favor.

5 "We harbor unwavering faith in the fact that  
6 the struggle for justice will emerge victorious in  
7 the end. As long as Japan, Germany, Italy and other  
8 Axis nations are solidly united, we need entertain no  
9 doubt as to the successful outcome of the war."

10 Finally, on the same issue, namely, the  
11 tenacity in the realization of the aims of the con-  
12 spiracy and the unity in aggressive war I present the  
13 fifth document. It is the text of the defendant  
14 SHIGEMITSU's speech at the 86th Session of the  
15 Diet made on January 21, 1945, that is to say, only  
16 three months prior to the unconditional capitulation  
17 of fascist Germany.

18 I present for identification the symposium  
19 "Kanpo" dated January 22, 1945, in which this speech  
20 can be found, document No. 590. An excerpt from this  
21 speech is tendered by me in evidence.

22 CLERK OF THE COURT: Prosecution's document  
23 No. 590 will receive exhibit No. 829 for identification  
24 only.  
25

(Whereupon, the document above



referred to was marked prosecution's exhibit  
No. 829 for identification.)

THE PRESIDENT: The excerpt is admitted on  
the usual terms.

CLERK OF THE COURT: And the excerpt there-  
from bearing the same prosecution documentary number  
will receive exhibit No. 829-A.

("Whereupon, the document above  
referred to was marked prosecution's exhibit  
No. 829-A and was received in evidence.)

GENERAL VASILIEV: Quote on page 3 of the  
English text:

"The combination between our empire and the  
other allied countries is becoming firmer and firmer,  
and we are convinced of carrying out the current war  
successfully to the last together with our allied  
countries at any cost.

"I am convinced that it is our most sacred  
mission to exert ourselves to carry out, together  
with our allied countries both in the East and West,  
the severe battles destined to exploit the future of  
mankind in order to accomplish the common war aim of  
making clear international justice in the war of  
self-existence and self-defense."

"With this I conclude the presentation of



1 evidence. Further evidence on the question of  
2 planning and preparing the attack on the Soviet Union  
3 by Japan in the course of Soviet-German war will be  
4 offered by my colleague, Colonel Rosenblit.

5 THE PRESIDENT: Colonel Rosenblit.

6 COLONEL ROSENBLIT: Beginning now on the  
7 8th of October of the current year the Tribunal ruled  
8 that prosecution document No. 2367, which is an ex-  
9 cerpt from the defendant ARAKI's talk with ISHIWATA,  
10 reported in the "Kokumin Shimbun," be accepted in  
11 evidence conditionally and the scope of the transla-  
12 tion or the translated portion be increased on the  
13 request of defense counsel so that the Court might  
14 ascertain whose words were quoted by us, whereupon  
15 the excerpt was given exhibit No. 667-A. We have the  
16 full text of the talk which was published in the  
17 "Kokumin Shimbun" of August 14, 1941, translated  
18 and served on the Court and the defense counsel.  
19 As to the Japanese copy, the full text of it had been  
20 distributed before our presentation of the case.  
21 Now it is clear from the full text of the transla-  
22 tion that the passage quoted by us and recorded on  
23 pages 7309 and 7310 of the Court report is ARAKI's  
24 own speech. I respectfully ask the Tribunal to rule  
25 that the above-mentioned exhibit No. 667-A be



unconditionally accepted.

1 THE PRESIDENT: The condition has been met.

2 COLONEL ROSENBLIT: Now I enter upon the  
3 presentation of evidence concerning the plans of  
4 attack on the U.S.S.R. which were being worked out  
5 by the Japanese Army General Staff during the Soviet-  
6 German war.  
7

8 I respectfully bring to the memory of the  
9 Tribunal prosecution document No. 1652, exhibit No.  
10 779, presented by my colleague in prosecution,  
11 General Vasiliev, containing the resolution of the  
12 conference in the presence of the Emperor, July 2,  
13 1941. It was decided at that conference to go on  
14 with the preparations for war against the Soviet  
15 Union and to wait for a suitable moment to solve  
16 by force of arms Japan's northern problems, to-wit,  
17 her claims upon the territories of the Soviet Union.  
18

19 I do not believe it is necessary to quote  
20 the said document again.

21 I shall submit evidence to the Tribunal  
22 which will show how the Japanese General Staff  
23 carried out the decisions of that Conference of the  
24 2d of July, 1941.

25 Now I submit to the Tribunal as evidence a  
photostatic copy of the telegram sent by Ott, German



Ambassador in Japan, and Kretschmar, German Military  
1 Attache in Japan, July 25, 1941, No. 1355, to  
2 Reichsminister for Foreign Affairs, and concurrently  
3 to the higher command, OKW, and to the Army General  
4 Staff, OKH, prosecution document No. 4052.

5 THE PRESIDENT: Admitted on the usual terms.

6 CLERK OF THE COURT: Prosecution's document  
7 No. 4052 will receive exhibit No. 830.

8 (Whereupon, the document above  
9 referred to was marked prosecution's exhibit  
10 No. 830 and was received in evidence.)

11 COLONEL ROSENBLIT: In this telegram (tt  
12 and Kretschmar state their impression of the progress  
13 of the mobilization proclaimed by the Japanese after  
14 Germany's attack on the U.S.S.R. This telegram will  
15 prove that this mobilization was carried out for the  
16 purpose of war against the U.S.S.R. I quote the  
17 full text of the telegram:  
18

19 "1) The draft of reserves slowly beginning  
20 in Japan and Manchukuo on 10 July and the following  
21 days, suddenly reached a large and no longer conceal-  
22 able extent, especially in the 1st, 4th, 7th, 12th  
23 and 16th division, and continued until today in  
24 decreased strength. Until the middle of August  
25 supposedly about 900,000 (nine hundred thousand)



1 reservists are to be drafted, that is the 24 to 45  
2 year olds; among the eldest, however, only  
3 specialists like drivers, technicians, people able  
4 to speak Russian, etc. After that, another 500,000  
5 (five hundred thousand) reservists, are supposedly  
6 available.

7 "2) Together with the drafting of the  
8 reservists on 10 July /orders came for/ a draft of  
9 horses, motor vehicles, etc., and a little later,  
10 instructions to firms to provide military goods of  
11 consumption, like foodstuffs, candles, and others  
12 till the end of September at the latest.

13 "3) On 11 (12) July limitation of the  
14 use of foreign languages in the teletype and tele-  
15 phone communications. In addition, starting 20 July  
16 mail censorship on foreigners' letters, also within  
17 Japan.

18 "4) Since 12 July prohibiting of travel by  
19 railway, ship, and airplane for foreigners on gradually  
20 all along distance lines within Japan and to Korea,  
21 China, Formosa. Japanese are also prohibited from  
22 entering Sachalin. Japanese students have to remain  
23 in the vicinity of their residence.

24 "5) Since about 10 July transporting of  
25 troops, beginning with Quartermaster troops, technician



1 troops and artillery of the 16th and 1st division  
2 and transport of reservists from Japan. Goal: Seishin  
3 and Tashin for troops and reservists, Tientsin and  
4 Shanghai only for reservists.

5 "6) Since the middle of July preparation  
6 in Manchuria for billeting and the arrival of troop  
7 transports. In addition increased transport of mil-  
8 itary goods, which may be interpreted as the establish-  
9 ing of supply bases."

10 Further on in this telegram Ott and Kretsch-  
11 mar give their considerations as to the Japanese  
12 military plans and the time of Japan's attack on the  
13 Soviet Union. I continue quoting the telegram:

14 "7) My impression:

15 "(a) Besides the increase of Japanese troops  
16 in Manchuria and probably also in North China, a new  
17 army group is being formed in Korea.

18 "(b) According to conversations with officers  
19 of the General Staff, besides the Japanese forces in  
20 Manchuria and Korea apparently also parts of the  
21 North China Army are to be used for action against  
22 the Soviet Union. No clarity regarding the Japanese  
23 operations plan. But it is probable that it will not  
24 be limited only to an attack on the Vladivostok area  
25 and in a northerly direction, but will also



1 simultaneously start in the direction of Lake  
2 Baikal, along the Manchurian Railroad, through Chita,  
3 and from the area of Kalgan through Outer Mongolia.

4           "(c) Time of start /of operations/ unknown.  
5 One fact which might bear this out is that, in my  
6 opinion, the deployment of troops will take until  
7 about the middle of August, and that General OKAMOTO  
8 several times mentioned in his conversations that  
9 Japan would only start when the German units had  
10 reached the Volga.

11           "(Signed) Kretschmar, Ott."

12           Evidence has been produced to the Tribunal  
13 that the Japanese Army General Staff destroyed oper-  
14 ation plans and other secret documents in August  
15 1945. I refer to the testimony given by Lieutenant-  
16 General KAWABE, Torashiro, former Deputy Chief of the  
17 Japanese Army General Staff, which is to be found on  
18 pages 7677 and 7678 of the records of the Court.

19           In his testimony KAWABE acknowledged the  
20 fact that those secret documents had been destroyed  
21 by the department and section chiefs of the Army  
22 General Staff during the period from August 13, 1945,  
23 to the date when the order of the Allied Powers was  
24 received, by which order destroying documents was  
25 prohibited.



1 THE PRESIDENT: Mr. Smith.

2 MR. SMITH: If your Honor please, I object  
3 to the prosecutor recapitulating testimony given by a  
4 witness and stating what it proved.

5 THE PRESIDENT: He is tying in certain  
6 evidence which is desirable.

7 COLONEL ROSENBLIT: To corroborate KAWABE's  
8 testimony I offer in evidence a certificate of MIYAMA,  
9 Yozo, Chief of correspondence section, 1st Demobiliza-  
10 tion Bureau of August 7, 1946. It is clear from  
11 KAWABE's testimony that operation plans of Japan as  
12 well as other secret documents, pertaining to preparing  
13 war against the U.S.S.R. cannot be submitted as they  
14 are not in the possession of the 1st Demobilization  
15 Bureau, prosecution document No. 2595-A.

16 THE PRESIDENT: Admitted on the usual terms.

17 CLERK OF THE COURT: Prosecution's document  
18 No. 2595-A will receive exhibit No. 831.

19 (Whereupon, the document above  
20 referred to was marked prosecution's exhibit  
21 No. 831 and was received in evidence.)  
22  
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1 COLONEL ROSENBLIT: I quote the full text of  
2 the certificate.

3 "CERTIFICATE

4 "Aug.7 , 1946.

5 "The undersigned does hereby certify that  
6 it is impossible to submit you the following docu-  
7 ments, as they are not in our possession now.

8 "1.) All the files of 1st and 2nd Depart-  
9 ments of Japanese General Staff bearing upon the plan-  
10 ning of war against the USSR. (Otsu and Kan-Toku-  
11 En Plans).

12 "2.) The correspondence of the General  
13 Staff and the War Ministry of Japan with the Head-  
14 quarters of Kwantung and Korean Armies on the ques-  
15 tion of military preparation of Japan for a war  
16 against the Soviet Union.

17 "Yozo MIYAMA."

18 "Chief of Correspondence Section,

19 1st Demobilization Bureau."

20 Therefore we cannot present in evidence to the  
21 Tribunal the original plans of war. However, by a  
22 series of affidavits and other evidence, we shall first  
23 of all prove that in the Summer of 1941 the Japanese  
24 Army General Staff elaborated a special plan of a  
25 speedy preparation for war against the U.S.S.R. under



1 the cipher "Kan-Toku-En", and secondly: we shall  
2 establish the contents of that plan.

3 I quote in evidence an excerpt from the  
4 affidavit of Lieutenant-General MIYAKE, Matsuhara  
5 of February 22, 1946 which has been tendered to the  
6 Court (Prosecution document No. 1950, Exhibit No. 699).

7 Quote from page 8 of the English text:

8 "Answer: A document was delivered from the  
9 KWANTUNG ARMY Headquarters to the Central Headquarters  
10 office of the KYOWA-KAI late in 1941: on the cover  
11 of the document there were written the words: "KAN-  
12 TOKU-EN".

13 "Answer: It was stated in this document that  
14 300,000 laborers for military construction were de-  
15 manded by the KWANTUNG ARMY Headquarters from the  
16 MANCHUKUO Government."

17 Now I quote in evidence an excerpt from the  
18 affidavit of Major-General AKIKUSA, Shun of February  
19 22, 1946 which has already been tendered to the Tri-  
20 bunal (Prosecution document No. 1983 Exhibit No. 743).

21 Quote from the middle of page 6:

22 "Question: What do you know concerning the plan  
23 of Kan-toku-en (A special grand maneuver of the Kwan-  
24 tung Army)?

25 "Answer: From the conversations with Colonel



1 Saburo HAYASHI, Chief of the Russian Section of the  
2 Second Department in the General Staff and other offi-  
3 cers, I learned that the plan of the Kan-toku-en was  
4 quickly drawn up after the start of attack on the  
5 Soviet Union by Germany in 1941 and its contents  
6 were the plan of preparation of military operations  
7 for the purpose of taking military aggression against  
8 the Soviet Union by Japan. And in connection with my  
9 duties I was personally aware of some measures with  
10 regard to the 'Kan-Toku-En' plan."

11 I quote further from the bottom of page 7:

12 "Question: Did you see any documents stamped  
13 'Kan-toku-en'?

14 "Answer: Yes, in 1943 I saw such documents con-  
15 cerning a financial account of the expenditure which  
16 was paid out of the Kan-toku-en budget."

17 I quote in evidence an excerpt from the  
18 affidavit of the Japanese TAKABE, Rokuzo, former  
19 Chief of the General Affairs Department of the Manchou-  
20 kuo Government, of March 26, 1946 (Prosecution document  
21 No. 2239 Exhibit No. 670). We have already presented  
22 this affidavit. This excerpt will prove that the  
23 "Kan-Toku-En", the literal translation of which is  
24 "Special Manoeuvres of the Kwantung Army" was actually  
25 a ciphered plan of strengthening the Kwantung Army



1 for the purpose of attacking the USSR.

2 I quote an excerpt from page 3 of the  
3 English text:

4 "Question: What do you know about the measures  
5 by the 'Kwantung Special Manoeuvre,' the plan called  
6 'Kan-Toku-En'?

7 "Answer: The 'Kwantung Special Manoeuvre' was  
8 a name for keeping secret the actions of the Kwantung  
9 Army. Actually the Kwantung Army was reinforced by  
10 this plan. According to this plan there were orders  
11 concerning the delivery of food and other things,  
12 supplying laborers, and transportation of goods.

13 "Question: When and by whom were you made to  
14 know the existence of the 'Kantokuen'?

15 "Answer: I heard about it at the beginning of  
16 July SHOWA 16 (1941) from KUROKAWA, Chief of the  
17 Fourth Section of the Kwantung Army Headquarters,  
18 and also from UMEZU, Commander of the Kwantung Army.

19 "Question: What kind of concrete things did  
20 UMEZU say concerning the 'Kantokuen' plan?

21 "Answer: During his talk with me, UMEZU told  
22 me about the increasement of the troops of the Kwan-  
23 tung Army and demanded the delivery of food for these  
24 troops.

25 "Question: Under your command what measures



1 should be taken by the Manchurian Government regarding  
2 the 'Kantokuen' plan?

3 "Answer: First of all, the delivery of goods  
4 necessary for the reinforced troops, transportation  
5 of these goods, the mobilization of laborers, and  
6 anything else necessary for the Army.

7 "Question: When were the measures of the Man-  
8 churian Government according to the 'Kantokuen' plan  
9 to be realized?

10 "Answer: Its measures were to be realized with-  
11 in six months. "

12 We are able to confirm the existence of the  
13 "Kan-Toku-En" plan still in another way.

14 We present to the Court as evidence, a photo-  
15 static copy of the directive of the Kwantung Army Head-  
16 quarters of September 16, 1941, signed by the Command-  
17 ing General of the Kwantung Army, the now Defendant  
18 UMEZU, Yoshijiro, that the army interpreters for the  
19 Kwantung Army be given additional education (Prose-  
20 cution Document No. 1973).

21 We present this directive so that the Tri-  
22 bunal may have a documentary evidence that in Sept-  
23 ember 1941 there really existed the "Kan-Toku-En" plan;  
24 and secondly that in order to carry out the "Kan-Toku-  
25 En" plan, intensive training of Russian Interpreters  
was necessary.



1 THE PRESIDENT: Major Blakeney.

2 MR. BLAKENEY: I should just like to point  
3 out to the Tribunal that this is another document  
4 emanating from the Red Army Chief Military Prosecution  
5 Department in Moscow, and, therefore, I assume would  
6 be admitted, if at all, conditionally as in the past.

7 MR. GOLUNSKY: If the Tribunal please,  
8 yesterday night we received from Moscow an answer to  
9 our inquiry about this document, and the certificate  
10 containing the information received has been dis-  
11 tributed today.

12 THE PRESIDENT: Well, the condition stands  
13 until the certificate is tendered in evidence later.

14 CLERK OF THE COURT: Prosecution document  
15 No. 1973 will receive exhibit No. 832.

16 (Whereupon, the above-mentioned  
17 document was marked prosecution's exhibit  
18 No. 832 and received in evidence.)

19 COLONEL ROSENBLIT: I quote the full text of  
20 the document signed by General UMEZU.

21 "The students of foreign language schools  
22 in Japan and Harbin College (Harbin Gakuin) who have  
23 been employed as Army interpreters on Russian lang-  
24 uage since the opening of the "Kan-toku-en" should  
25 be given supplementary education, in accordance with



1 the 'Outline of Supplementary Education for Kwangtung  
2 Army Interpreters', as explained in the separate book-  
3 let.

4 "Sept. 16, 1941

5 "Commander, Kwantung Army UMEZU, Yoshijirō."

6 Now it remains for us to present evidence  
7 as regards the contents of the 'Kan-Toku-En' plan.

8 I shall now deal with the affidavit of Feb-  
9 ruary 21, 1946 of Lieutenant-General TOMINAGA, Keoji  
10 former Chief of the Operation Department of the Army  
11 General Staff, who was later on appointed Vice-War  
12 minister. This affidavit has already been submitted  
13 to the Tribunal and partly quoted by Colonel Ivanov  
14 (Prosecution document No. 1984 Exhibit No. 705)

15 I quote in evidence an excerpt from the afore-  
16 said affidavit, page 6 of the English text:

17 "The Kan-Toku-En plan was elaborated in the  
18 middle of 1941, as war broke out between the U.S.S.R.  
19 and Germany. The war situation was not favorable for  
20 the Red Army and we expected that the U.S.S.R. would  
21 transfer her troops from the Soviet Far East to the  
22 western front. On account of this, we supposed that  
23 we could easily occupy the Far East."

24 I skip one line and quote further:

25 "The 'Kan-Toku-En' plan was based upon the



1 operation plan of the Army General Staff drawn out  
2 by me in 1940. As I have mentioned before, according  
3 to the former plan, the attacks on all fronts were  
4 supposed to be brought about in turn with rather long  
5 intervals between them; but according to the 'Kan-  
6 Toku-En' plan all the blows were to be dealt simul-  
7 taneously."

8 TOMINAGA then explains the defendant TOJO,  
9 Hideki's point of view concerning the 'Kan-Toku-En'  
10 plan.

11 I quote further from page 7 of the English  
12 text:

13 "Answer. In 1941, TOJO said to me in a  
14 conversation: 'The present time is very suitable  
15 for an aggression against the U.S.S.R. because  
16 we can carry on war without encountering any strong  
17 resistance from the Soviet Army.' He further said,  
18 'The Japanese Army would gain a great prestige by  
19 attacking the U.S.S.R. at a time when it is ready  
20 to fall to the ground, like a ripe persimmon.' TOJO  
21 also said that it was necessary to increase the num-  
22 ber of present units in Manchuria, as a way of prompt  
23 mobilization of the Kwantung Army.

24 "Question. Do you confirm that TOJO had a  
25 strong intention of aggression against the U.S.S.R.  
at that time?



"Answer. Yes, I do."

1           The question of strengthening the Kwantung  
2 Army according to the 'Kan-Toku-Eh' plan is likewise  
3 disclosed in a series of other affidavits which I  
4 shall present later.

5           My colleague, Colonel Ivanov, has already  
6 presented to the Court as evidence, a report of the  
7 Red Army General Staff concerning the increase in  
8 strength of the Kwantung Army and the Japanese Army,  
9 in general, for the period from 1931 through 1945.  
10 (Prosecution document No. 2237, Exhibit No. 706).

11           If the Tribunal please I shall once more  
12 refer to this document and call it to the Tribunal's  
13 attention that by January 1, 1942, the strength of  
14 the Kwantung Army had reached, 1,100,000 men,  
15 and at the same time the number of tanks in the  
16 Kwantung Army was doubled, whilst the number of air-  
17 planes had even tripled in comparison to those of  
18 1937.

19           We offer in evidence the affidavit of Major  
20 MATSUURA, Kusuo, of May 18, 1946, who was Chief of  
21 the Ciphoring Service of the Japanese forces in Inner  
22 Mongolia, and later was assigned the same position in  
23 the Kwantung Army. (Prosecution document No. 2153).  
24 This document will show that in the same period the  
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1 Japanese Army in Inner Mongolia was also preparing to  
2 attack the U.S.S.R.  
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1 THE PRESIDENT: Major Blakeney.

2 MR. BLAKENEY: If the Tribunal please, I wish  
3 to call attention to at least one objectionable  
4 question and answer in this affidavit, which I submit  
5 should be removed from consideration of the Tribunal.  
6 I refer particularly to the top of page 3. The  
7 affidavit has very few questions quoted verbatim,  
8 but the entire affidavit gives evidence of having been  
9 the result of leading questions. And at the top of  
10 page 3 we see a perfect example of a question which  
11 is leading and which also assumes facts which have  
12 not been disclosed earlier by the witness. There-  
13 fore, I object to that question and answer and request  
14 that they be disregarded.

15 THE PRESIDENT: The objection is overruled.

16 Mr. McManus.

17 MR. McMANUS: May I address the Court?

18 THE PRESIDENT: I had called on you to do  
19 so. You are not using your earphones, and you are  
20 making me repeat things unnecessarily, which I  
21 resent.  
22

23 MR. McMANUS: If your Honor please, this  
24 might not be the propitious time, but in view of  
25 the fact that I am somewhat confused, I think if  
the Court will grant me that privilege of making



1 my statement concerning my client, I should like to  
2 call the attention of the Court to make a simple  
3 statement that in exhibit 787 the name of ARAKI is  
4 not the accused in the dock. I make that statement  
5 for the simple reason that several other counselors  
6 made that statement, and my silence might have  
7 militated against me. I would just like that noted  
8 in the record. I am sorry that I am interrupting  
9 the proceedings at this time, but I would like it  
10 noted in the record.

11 THE PRESIDENT: Colonel Rosenblit.

12 COLONEL ROSENBLIT: I shall quote excerpts  
13 from the aforesaid affidavit which will show how the  
14 Japanese Command was preparing for a major war against  
15 the U. S. S. R. in the fall of 1941.

16 Quote from page 3 of the English text:

17 "After the beginning of the German-Soviet  
18 War, about June 23-24, 1941, Gen. OKAMURA, Commander  
19 of the North China Area Army, called by cipher  
20 telegram Lieut.-Gen. AMAKUSU, Commander of the Mon-  
21 golia Stationary Army, and Col. KABURAGI Masataka,  
22 senior staff officer in charge of military operations,  
23 to the North China Area Army Headquarters in Peking.  
24 The above two left for Peking about June 24, 1941.

25 "On returning from Peking, about July 5, 1941,



1 Lieut.-Gen. AMAKASU Tataro called all commanders of  
2 the forces under his command for an assembly. It  
3 appeared that directives concerning preparations of  
4 war against the Soviet Union were given at this  
5 meeting. Regarding the military operations against  
6 the Soviet Union, Japanese troops in Inner Mongolia  
7 had to act in concert with the Kwantung Army."

8 A few lines further, on page 3, the same  
9 document reads as follows:

10 "At the same time, the Commander of the  
11 26th Division who had been in charge of suppressing  
12 Chinese guerilla army received orders to prepare for  
13 military operations against Outer Mongolia in the  
14 Feisuantaku desert district."

15 As is clear from Major MATSUURA's testimony,  
16 the matters were not limited only to conferences and  
17 directives, soon actual deeds followed.

18 I further quote the same document from page 3:

19 "Early in Sept., 1941, Lieut.-Col. KOTANI,  
20 General Staff Officer arrived by airplane from the  
21 Kwantung Army Headquarters."

22 I skip a few lines and quote further:

23 "Since June, 1941, the discharge from  
24 military service upon expiration of the term was  
25 suspended, and the increase of troops was enforced by



1 newly conscripted strength. For example, over  
2 5,000 appear to have arrived between June and Dec.,  
3 1941."

4 I shall now quote MATSUURA's report of a  
5 conversation with Captain NANI, regarding the future  
6 attack on the U. S. S. R.

7 At that time MATSUURA was also a captain.  
8 The relevancy of the talk of the two Japanese cap-  
9 tains is doubtless because, taking into account all  
10 evidence together, these talks show that the plans  
11 elaborated in the upper strata, penetrated into the  
12 core of the Army and were the actual themes of con-  
13 versations inciting the Army to prepare for an attack  
14 on the U. S. S. R.

15 I further quote the affidavit of MATSUURA  
16 from p. 4:

17 "I cannot help but say that the problem of  
18 an offensive against the Soviet Far East was openly  
19 discussed by Japanese officers. During a conversa-  
20 tion with Captain NANI, Ichiro, an officer attached  
21 to the Army Intelligence Section, he stated that the  
22 offensive of the Japanese army against Outer Mon-  
23 golia was to be directed against Ulanbator-Zabaikalye,  
24 the object which lay in making military transporta-  
25 tion to the Far East difficult by cutting off the



1 Trans-Siberian Railroad."

2 In order to follow the logical development  
3 of my presenting the case I need not quote from this  
4 affidavit for the time being, and shall return to it  
5 later on.

6 As is clear from the evidence tendered by  
7 my colleague General Vasiliev and myself, the  
8 Japanese attack against the U. S. S. R. was first  
9 fixed at August or September, 1941.



1 THE PRESIDENT: Major Blakeney.

2 MR. BLAKENEY: At this time, if the Court  
3 please, we should like to request information of the  
4 prosecution as to the status and location of this wit-  
5 ness, and should like to make the usual request for a  
6 direction that he be brought and made available for  
7 cross-examination.

8 (Whereupon, Colonel Rosenblit made a state-  
9 ment in the Russian language.)

10 RUSSIAN INTERPRETER: The first part of the  
11 statement was not heard.

12 MR. GOLUNSKY: If the Tribunal please, we  
13 have sent a telegram asking for information about all  
14 the Japanese witnesses whose affidavits have been  
15 produced here. As soon as we get the information we  
16 will submit it to the Tribunal.

17 THE PRESIDENT: The application for production  
18 of the witness here will be considered.

19 Colonel Rosenblit.

20 COLONEL ROSENBLIT: As is clear from materials  
21 of Military Games of the Institute of Total War  
22 presented by us, prosecution document No. 1622, exhi-  
23 bit No. 686-A, there are indications in those materials  
24 that the Japanese attack on the U.S.S.R. was postponed  
25 from the summer of 1941 to July-August 1942.



1           If the Tribunal please, I shall call for direct  
2 examination, the witness, former Lieutenant Colonel of  
3 the Kwantung Army SEJIMA, Ruizo, who, in 1940 through  
4 1944, worked in the Operations Department of the  
5 Japanese Army General Staff.

6           THE PRESIDENT: Major Blakeney.

7           MR. BLAKENEY: While we are waiting, may I  
8 point out that through inadvertence the last document  
9 was not admitted and given an exhibit number.

10          THE PRESIDENT: I inquired as to that. It  
11 was really admitted. An objection was dealt with.  
12 The only objection raised to it was dealt with, and  
13 the number was then called. We treat that as admission.

14          CLERK OF THE COURT: Prosecution's document  
15 No. 2153 was given exhibit No. 833.

16               (Whereupon, the document above  
17 referred to was marked prosecution's exhibit  
18 No. 833, and was received in evidence.)  
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1 R U I Z O S E J I M A, called as a witness on  
2 behalf of the prosecution, being first duly  
3 sworn, testified through Japanese interpreters  
4 as follows:

5 DIRECT EXAMINATION

6 BY COLONEL ROSENBLIT:

7 Q Mr. Witness, tell to the Court your name and  
8 your first name.

9 A SEJIMA, Ruizo.

10 Q What is your age?

11 A Thirty-four.

12 Q What was your position in the Kwantung Army  
13 before the surrender?

14 A Staff officer, First Section, Kwantung Army.

15 Q Did you or did you not work in the Operations  
16 Department of the Army General Staff?

17 A Yes.

18 Q You are a war prisoner of the Soviet Army  
19 at present? You are being shown prosecution document  
20 No. 2673, which is written in the Japanese language.  
21 This is your affidavit of September 27, 1946, isn't  
22 it? Look through this document. Did you or did you  
23 not write it by your own hand?

24 A Yes, I wrote it with my own hand. Yes, this  
25 was written by me.



1 Q The signature which appears on all the pages  
2 of the affidavit is your signature, isn't it?

3 A Yes.

4 Q Are the contents of this affidavit true to  
5 fact?

6 A Yes.

7 COLONEL ROSENBLIT: I produce in evidence  
8 prosecution document No. 2673, which is an affidavit  
9 of the witness SEJIMA, Ruizo, of September 27, 1946,  
10 in the Japanese language.

11 THE PRESIDENT: Admitted on the usual terms.

12 CLERK OF THE COURT: Prosecution's document  
13 No. 2673 will receive exhibit No. 834.

14 (Whereupon, the document above  
15 referred to was marked prosecution's exhibit  
16 No. 834, and was received in evidence.)

17 THE PRESIDENT: Do you propose to read all  
18 this?

19 We will recess for fifteen minutes.

20 (Whereupon, at 1045, a recess was  
21 taken until 1100, after which the proceedings  
22 were resumed as follows:)  
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SEJIMA

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MARSHAL OF THE COURT: The International  
Military Tribunal for the Far East is now resumed.

THE PRESIDENT: Colonel Rosenblit.

COLONEL ROSENBLIT: If the Tribunal please,  
I shall produce in evidence prosecution document  
No. 2673, the full text of the affidavit.

(Reading)

"I, SEJIMA, Ryuzo, ex-Lieutenant-Colonel  
of the Japanese Army, born in 1911 state as follows:

"I graduated from the Military Academy in  
1932 and from the Military College in 1938. In January  
1940 I was attached to the Army General Staff Office;  
then in December 1941, I was appointed member of the  
1st Department (Military Operations Department) of  
the Army General Staff Office, where I actually worked  
till August 1944, 19th year of Showa.

"I take oath and testify as follows to the  
facts I had been able to learn in the execution of  
my duties while working with the Army General Staff  
Office from January 1940 to August 1944.

"I. During this period I worked continuously  
in Section II /'DAINIKA'/ 1st Department of the Army  
General Staff Office. This section, called the Military  
Operations Section, took charge of duties regarding  
plans for military operations. From January 1940 to



SEJIMA

DIRECT

1 December 1941, I attended to matters of general business  
2 which included safe-keeping of secret documents and  
3 incineration of documents for which the custody period  
4 had expired. During the period that I was a member  
5 of Section II, I had charge of matters regarding employ-  
6 ment of military forces, and during the latter part,  
7 I also participated in the drawing up of operational  
8 plans, some of which I drew up myself.

9 "In about spring of 1941, I incinerated the  
10 documents concerning the plans for the 1939 military  
11 operations which had been kept in the document safe.  
12 In the Army General Staff Office, the period of  
13 custody for operational plans was generally two  
14 years. Before incinerating these documents I took  
15 a glance through them and found among them the plans  
16 for the 1939 operations against the U.S.S.R. It was  
17 thus that I learned about these plans and can still  
18 recollect their outline.

19 "According to this plan, the chief strategical  
20 scheme of Japan's Supreme Command, in case of a Russo-  
21 Japanese war, was to concentrate our main forces in  
22 Eastern Manchuria and take the offensive against Far  
23 East Russia. In this case, the Kwantung Army was to  
24 occupy VOROSHIWOW, VLADIVOSTOK, IMAN and then KHABA-  
25 ROVSK, BLAGOVESHCHENSK and KUIBYSHEVSKA.



SEJIMA

DIRECT

1 "After I became a member of Section II, 1st  
2 Department of the Army General Staff Office, I was  
3 able to learn in far more detail the contents of the  
4 operational plans as my duties were related to the  
5 employment of military forces. It was because I  
6 had to consider operational plans for the various  
7 areas concerned, in the employment of military forces.  
8 Accordingly, I have been able to learn the plans for  
9 operations against Russia for the years 1941 and 1942.

10 "According to the operational plan for the  
11 year 1941 the Kwantung Army was to concentrate its  
12 main forces in the direction of the Maritime Provinces,  
13 a part of its forces in the direction of BLAGOVESHCHENSK  
14 and KUIBYSHEVSKA, and another part in the neighbourhood  
15 of HAILAR while the reserve was to be concentrated  
16 in HARBIN in the event of a Russo-Japanese war. The  
17 offensive was to be taken from the SUI-REN-HO district  
18 towards and from the HEI-HO district towards the  
19 BLAGOVESHCHENSK and KUIBYSHEVSKA districts. Plans  
20 were made for the forces in the neighbourhood of  
21 HAILAR to take a defensive position in order to protect  
22 offensive operations in other areas. The aim of the  
23 offensive operations in the Maritime Provinces was to  
24 occupy that area, while the offensive in the BLAGO-  
25 SHCHENSK and KUIBYSHEVSKA districts was meant to cut



SEJIMA

DIRECT

1 the railway, to make reinforcement and supply from  
2 the west impossible.

3 "In the first phase of the war, they expected  
4 to occupy VOROSHILOV, VLADIVOSTOK, BLAGOVESHCHENSK,  
5 IMAN, KUIBYSHEVSKA and RUKHLOVO, while in the second  
6 phase, they expected as far as the situation permitted,  
7 to occupy North SAKHALIN, Port PETROPAVIOVSK of  
8 KAMCHATKA, NIKOLAYEVSK of the Amur River, KOMSOMOLSK  
9 and SOVGAVAN.

10 "Beside the Army's plan of operation worked  
11 out at the Army General Staff Office, there were as  
12 a part of the operational plans, the plans for joint  
13 operations to be carried out in close cooperation  
14 by the Army and Navy together. Out of these plans,  
15 those concerning Naval operations were worked out  
16 at the Naval General Staff Office and forwarded to  
17 the Army General Staff Office where they were in-  
18 serted as part of the operational plans. "  
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SEJIMA

DIRECT

1 "Accordingly, I looked through some of the  
2 plans for Naval operations also. For instance, the  
3 Naval operations for 1941 had the three following ob-  
4 jects:

5 "(1) to protect the landings on Port PE-  
6 TROPAVIOVSK of KAMCHATKA and NORTH SAKHALIN;

7 "(2) to attack the Russian Pacific Fleet  
8 and blockade VLADIVOSTOK from the sea front.

9 "(3) to protect the communication line con-  
10 necting Japan Proper, Korea and Manchuria by guarding  
11 the TSUSHIMA channel.

12 "In 1942, the 1st Department of the Army  
13 General Staff Office had worked out a new plan for  
14 operations against the U.S.S.R., which was adhered to  
15 until the spring of 1944. Having seen this plan many  
16 times, I can still recollect its outline.

17 "Like all the previous operational plans,  
18 this plan for the year 1942 was an offensive plan and  
19 the operation was scheduled to commence with a sur-  
20 prise attack.

21 "According to the above plan, about thirty  
22 divisions were scheduled to be concentrated in MANCHURIA  
23 with the main force in Eastern MANCHURIA and concentra-  
24 tions of some of the forces in the SUN-WU and HAILAR  
25 districts respectively. The First Front which was to



SEJIMA

DIRECT

1 take the offensive against VOROSHILOV consisted of  
2 the 2nd, 3rd, 5th and 20th armies. The forces of the  
3 four armies were to advance in parallel so that they  
4 could fight a decisive battle in the vicinity of  
5 VOROSHILOV. The 2nd Front consisted of the 4th and  
6 8th armies and its object was to take the offensive  
7 in the SVOBODNI and KUIBYSHEVSKA districts to anni-  
8 hilate the Russian forces in those areas, and cut  
9 the railway. Diversional operations were scheduled  
10 to be undertaken by the 6th Army in the Western areas.  
11 In the first phase of the war, the Japanese Army was  
12 scheduled to occupy the Russian cities in the Mari-  
13 time Province and BLAGOVESHCHENSK, SVOBODNI and  
14 KUIBYSHEVSKA. The forces in HOKKAIDO were to occupy  
15 North SAKHALIN, and a division in Japan Proper was to  
16 occupy Port PETROPAVLOVSK of KAMCHATKA.

17 "The plans for Naval operations for the year  
18 1942 was in general the same as that of 1941. The  
19 operational plans against the U.S.S.R. for 1943 also  
20 followed the above plans for 1942.

21 "It had never been explained to me whether  
22 there was to be a war against Russia or not. All I  
23 knew were the military matters concerning operational  
24 plans as an officer of the 1st Department of the Army  
25 General Staff Office, and I have no knowledge concerning



SEJIMA

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1 political relations.

2  
3 "II. In about the summer of 1941, after the  
4 German attack on Russia, I came to learn the following  
5 facts in connection with the reinforcement of the  
6 Kwantung Army.

7 "A. In about the summer of 1941, I saw,  
8 at the 1st Department of the Army General Staff Office,  
9 the text of the Imperial Command (handwritten) for  
10 despatching two new divisions to the Kwantung Army.

11 "B. In about the summer of 1941, I saw, at  
12 the 1st Department of the Army General Staff Office, a  
13 military order (printed) reorganization in connection  
14 with the fifteen divisions of the Kwantung Army on a  
15 semi-war-time basis, which was distributed to each sec-  
16 tion of the department.

17 "C. Through the documents I saw at the Army  
18 General Staff Office, in other words, through the tele-  
19 grams reporting the progress of mobilization in all  
20 districts, I knew that a mobilization was underway in  
21 Japan in the summer of 1941 to reinforce the Kwantung  
22 Army. The number of mobilized men was about 300,000,  
23 and I came to learn about it through calculation of  
24 the strength of the Kwantung Army in 1942.

25 "The mobilization was secretly carried out,



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1 and the usual elaborate send-offs for the conscripts  
2 were prohibited. In Tokyo, I often saw mobilized troops  
3 passing through or leaving from the stations in pro-  
4 found silence.

5 "The above was written by my own hand and the  
6 contents are true.

7

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"(signed) Sejima, Ryuzo"

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1           The affidavit is signed by the witness  
2 SEJIMA, Ruizo, on the 27th of September, 1946, and the  
3 witness was duly sworn in the presence of United States  
4 Army Captain Roland Schwartz and Second Lieutenant  
5 Hattori.

6           The witness is now at the disposal of defense  
7 counsel for cross-examination.

8           THE PRESIDENT: Dr. KIYOSE.

9  
10           CROSS-EXAMINATION

11 BY DR. KIYOSE:

12           Q   In the affidavit just read, fifth page of  
13 the Japanese text, fourth page of the English text,  
14 second paragraph, the following words are found:  
15 "It had never been explained to me whether there was  
16 to be a war against Russia or not." Now, I ask you,  
17 Mr. Witness, is this not a plan formulated regularly  
18 whether there is any intention on the part of the  
19 government for a policy of war or not?

20           THE MONITOR: Regularly every year.

21           A   I have no knowledge whatsoever of the rela-  
22 tions between the plans -- strategic plans of the  
23 General Staff and the government's policy. However,  
24 at the General Staff it is customary to formulate a  
25 plan yearly anticipating that such a situation might



SEJIMA

CROSS

1 arise so that the General Staff can cope with the  
2 eventuality.

3 Q In our country is it not the high command  
4 which independently makes operational plans? Mr.  
5 Witness, I ask you in our country is it not true that  
6 the government is an advisory organization, advisory  
7 body, and that the high command independently of the  
8 government formulates operational plans?

9 THE MONITOR: Advisory to the Emperor.

10 A With respect to such problems of the highest  
11 command, such as the relationship between the govern-  
12 ment and the high command, I do not know a thing.

13 Q In your affidavit, Mr. Witness, you state  
14 that you had participated in formulating an operational  
15 plan. Did you or did you not do so at the instructions  
16 of the government or the cabinet?

17 A In formulating operations plans we always  
18 acted according to the orders from our superiors and  
19 we had nothing to do with the cabinet.

20 THE MONITOR: No direct orders from the  
21 cabinet.

22 Q Then the fact that operational plans were made  
23 against a specific country does not mean, does it,  
24 that the government or cabinet had any desire to make  
25 war on that country?



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CROSS

1 THE PRESIDENT: That isn't within the scope  
2 of the affidavit. We are not going to take opinions  
3 of that type from this class of witness. His rank  
4 is not sufficiently high to warrant such a question.

5 Q Mr. Witness, you testified with respect to  
6 formulating operational plans for the years 1942 and  
7 1943. Were new plans formulated for the years 1944  
8 and 1945?

9 THE INTERPRETER: Correction: You testified  
10 in your affidavit that you had participated in the  
11 formulation of operational plans for the year 1941  
12 and 1942. Were new plans made in 1944 and 1945 ?

13 A Yes. I will answer to that question, operation-  
14 al plans were made for the years 1944 and 1945.

15 Q Can you give the outline of those plans?

16 A Operational plans for the years 1944 and 1945  
17 consisted of defensive strategic plans.

18 THE MONITOR: Strategical defensive plans.

19 THE INTERPRETER: Strategical defensive plans,  
20 rather.

21 Q Is that the end of your reply?

22 A Yes, that is all.

23 Q You just spoke of strategic defensive plans.  
24 Now, even in case such plans were offensive in nature,  
25 that doesn't mean that there were aggressive designs,



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CROSS

1 Isn't that so?

2 MR. COLUNSKY: I object to the question as  
3 calling for the opinion of the witness on matters on  
4 which his opinion cannot be founded.

5 THE PRESIDENT: Do you wish to support your  
6 question, Dr. KIYOSE?

7 DR. KIYOSE: I thought it would be made much  
8 clearer if some explanation was made with respect to  
9 defensive strategical operations to which the witness  
10 testified and offensive strategic operations, the  
11 difference between the two.

12 THE PRESIDENT: I can't conceive that there  
13 is any difference in these circumstances. You might  
14 ask whether there is that difference here but that  
15 wasn't the question actually.

16 Q Then, as the Court said, Mr. Witness, will you  
17 briefly explain the difference between a defensive  
18 and an offensive operation?

19 A Is the purport of your question this, that  
20 an offensive operation means an operation which would --  
21 by which the territory of a foreign country is invaded  
22 by the attacking army? Is that the idea of the ques-  
23 tion? Or do you mean whether or not it is aggression  
24 or not?

25 Q In your affidavit you mention offensive



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1 operations, in the latter part of your affidavit, and  
2 that is why I should like for you to make this point  
3 clear.

4 THE MONITOR: Including the point you just  
5 mentioned.

6 A Whether a military operation is to be considered  
7 as a defense or offense is a purely strategic matter,  
8 and whether a war is a war of aggression or not is  
9 completely without the scope of strategic matters and  
10 I wouldn't be able to say anything about it.

11 THE MONITOR: Slight correction: Whether  
12 the offensive operation constitutes aggression or not  
13 is outside of the operation plan. That is the war plan.  
14 That I don't know anything about.  
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Q In your testimony with respect to the year 1942, Mr. Witness, you spoke of the first phase and the second phase, and later after that the third phase. Were the plans of that phase of which you spoke the westward movement? Was there such a place as that?

THE MONITOR: A slight correction. You spoke of the first phase and the second phase, and later on you spoke of the westward movement, which gave the impression that there was a third phase to this. Was there such a third phase or following phases?

A According to the strategic plan which I knew personally there was no such plan as a plan of the western front, Outer Mongolia and Baikal region.

Q Mr. Witness, do you know of the years 1904 and 1905, the time of the first Russo-Japanese war, whether or not Japan already had a planned phase to fight Russia at the time?

THE MONITOR: A slight correction. Do you know, Mr. Witness, that through the years 1904 and 1905, at the time of the Russo-Japanese war, whether or not there was any year in the Japanese history when there were no plans vis-a-vis Soviet Russia, operational plans?

A No, I don't know about that.



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1 Q Lastly, in the second part of your affidavit,  
2 namely, on page 4, there is a statement from you to  
3 the effect that since 1941 the Kwantung Army was  
4 re-inforced. Since then has there been any move-  
5 ment of these troops for deployment to other areas,  
6 other theaters resulting in a decrease of the strength  
7 of the Kwantung Army?

8 A Out of the troop re-inforcement in the  
9 summer of 1941 a considerable number was deployed  
10 and sent to the Pacific front; that is, the front  
11 against the United States, since 1943.

12 DR. KIYOSE: That concludes my cross-  
13 examination.

14 CROSS-EXAMINATION (Continued).

15 BY MR. BLAKENEY:

16 Q Mr. Witness, what were your duties in the  
17 second section of the second division of the General  
18 Staff office?

19 A As I have stated in my affidavit, I was in  
20 charge of general matters at first and then with re-  
21 spect to matters regarding employment of military  
22 forces.

23 MONITOR: Employment of troops in the  
24 whole army.

25 Q What was your connection with the drawing of



SEJIMA

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1 operations plans?

2 A As I have stated in my affidavit, in hand-  
3 ling matters with respect to the employment of mili-  
4 tary forces I also participated in drawing up opera-  
5 tional plans. I have had occasion to see operational  
6 plans.

7 Q In addition to having occasion to see them  
8 did you or did you not assist in drawing them up?

9 A By operational plans, Mr. Counsel, do you  
10 mean operational plans against the Soviet Union?

11 Q Yes, or any others.

12 A Yes, plans which I drew personally by order  
13 of my senior officer.

14 Q Were plans vis-a-vis the United States since  
15 1943 up to the Philippine occupation-- the Philippine  
16 operation-- and then the operational plan against  
17 Russia, or against other countries, if there were  
18 others, were all prepared, were they not, by the  
19 General Staff office?

20 A Operational plans are made by the General  
21 Staff office under the direction of the Chief of Gen-  
22 eral Staff, and then after it has been revised and  
23 sanction received from the Throne it becomes a for-  
24 mulated operational plan of the army.

25 Q Then in the drafting of these operational



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19 General Staff office?

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22 eral Staff, and then after it has been revised and  
23 sanction received from the Throne it becomes a for-  
24 mulated operational plan of the army.

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1 plans no assistance was received from the outside of  
2 any nature, is that right?

3 A By outside do you mean outside the General  
4 Staff office?

5 Q That is what I mean.

6 A No assistance in connection with anything  
7 outside the General Staff office itself.

8 Q Therefore, in the drafting of the operations  
9 plan against the Soviet Union the commanding general  
10 of the Kwantung Army had nothing to do with such plan,  
11 is that correct?

12 A With respect to the operational plan vis-a-vis  
13 the Soviet Union, I might say that in connection with  
14 the relationship between the General Staff office and  
15 the Commander-in-Chief of the Kwantung Army, that the  
16 Chief of the General Staff, after reporting and re-  
17 ceiving the sanction of the Throne, would send di-  
18 rections with respect to the operational plans to  
19 the Chief or Commanding General of the Kwantung Army,  
20 who adopts it on the basis of the plans forwarded to  
21 him and formulates his plans.

22 Q That is to say, that the plans forwarded to  
23 him by the General Staff office are his orders, is  
24 that correct?

25 A If I should put it more literally in Japanese,



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1 I would say that as follows: operational orders with  
2 respect to the operational plans of the Imperial Army  
3 of such and such a fiscal year, with respect to this  
4 order of the Chief of the Army General Staff, after  
5 reporting and receiving the sanction of the Throne,  
6 sends instructions of the order to the Commanding Gen-  
7 eral of the Kwantung Army and the Commander-in-Chief  
8 of the Kwantung Army acts in accordance with this  
9 order, together with which comes an Imperial order,  
10 or Imperial command, after which sanction has been  
11 received. Therefore, the Commanding General acts in  
12 accordance with the orders of the Emperor as General-  
13 issimo.

14 Q In addition to the annual operations plan  
15 against the Soviet Union, were there any prepared in  
16 the General Staff office, annual operations plans  
17 against other nations as well?

18 A As regards other countries, Japan had al-  
19 ready engaged in war the United States and Britian and  
20 China and, therefore, actual operation plans were al-  
21 ready being carried into effect.

22 Q I am not referring specifically to the time  
23 when war was in progress, but I mean in general were  
24 the war plans prepared annually.

25 A Yes, with respect to the years with which I



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1 am familiar; that is, 1939 and just before the out-  
2 break of war in 1941, the plans were already formulated,  
3 in addition to the operational plan against the Soviet  
4 Union, operational plans in the event of American-  
5 Japanese war, and in the event of British-Japanese war.

6 Q And annual plans regarding operations against  
7 China?

8 THE PRESIDENT: He has not made any admission  
9 about annual plans, as far as I understand him. He  
10 spoke of particular years, but you can clear that up  
11 if you wish.

12 BY MR. BLAKENEY:

13 I understood otherwise, but I will be  
14 glad to bring it out.

15 Q Mr. Witness, during the time that you served  
16 in the operation section of the General Staff office  
17 and for many years prior to that time, is it or is it  
18 not true that the General Staff office annually pre-  
19 pared operational plans of the type which we are now  
20 discussing?

21 A Yes, that is a fact.

22 Q You have spoken of yourself destroying the  
23 1939 operations plan against Soviet Russia. Was that  
24 such an annual plan?

25 A Yes.



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1 Q You have referred also to operation plans  
2 against the Soviet Union for the years 1941 and 1942.  
3 Were these also such annual operations plans?

4 A Yes.

5 Q Then my question, which has not been answered,  
6 was: were such annual plans drawn also for operations  
7 in the event of hostilities with China?

8 A The conflict with China began in 1937, but I  
9 am only personally familiar with the plans since 1939,  
10 at which time the conflict with China was already in  
11 progress; therefore, the operational plans were al-  
12 ready being carried out.

13 THE PRESIDENT: Does his knowledge of other  
14 countries extend before 1937?

15 THE WITNESS: No.

16 BY MR. BLAKENEY:

17 Q Were you also familiar during your period of  
18 service in the General Staff office with the annual  
19 plans to be used in the event of hostilities with the  
20 Philippines, French Indo-China, and perhaps other  
21 countries?

22 A For the Philippines, yes, but I don't re-  
23 member for the others.

24 Q As I understand from your affidavit, these  
25 operations plans were periodically destroyed after



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1 adoption of later plans. Is my understanding correct?

2 A Yes.

3 Q Then, as a matter of routine in the General  
4 Staff office, operational plans were annually drawn  
5 up providing for operation against countries with  
6 which Japan might come in conflict, and the plans  
7 were periodically revised and then destroyed, is that  
8 correct?

9 A Yes. The plans, as I have stated before,  
10 were annually made, and when the next new year ap-  
11 proached the plans for the former year were destroy-  
12 ed. But even during a year plans were constantly re-  
13 vised to move in accordance with the international  
14 situation.

15 Q Do you know whether that routine is the prac-  
16 tice in General Staff offices through the world?

17 THE PRESIDENT: Let him say first whether he  
18 served in any general staff office **other** than Japan.

19 MR. BLAKENEY: Obviously he did not, but I  
20 asked him whether he knew, sir.

21 THE PRESIDENT: I suppose we know that plans  
22 are prepared in the general staff offices of other  
23 countries, but what they would be about we would not  
24 know, nor would he.

25 MR. BLAKENEY: Nor do I, but I think none of



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1 us care, except the fact that they do exist. We will  
2 change the subject.

3 Q You have stated in your affidavit that the  
4 operations plans for 1942 vis-a-vis Soviet Union, was  
5 an offensive plan.

6 A Since 1942?

7 Q Yes.

8 THE PRESIDENT: This is a convenient break,  
9 Major Blakeney. We will adjourn now until half-  
10 past one.

11 (Whereupon, at 1200, a recess was  
12 taken.)

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## AFTERNOON SESSION

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The Tribunal met, pursuant to recess, at 1330.

MARSHAL OF THE COURT: The International  
Military Tribunal for the Far East is now resumed.

THE PRESIDENT: Major Blakeney.

BY MR. BLAKENEY (Continued):

Q I will repeat the question which I was putting when we recessed. You have stated in your affidavit, Mr. Witness, that the operations plan for 1942 was an offensive plan. May we take this to mean that this plan and other plans of a similar nature were drawn in accordance with the military precept that offense is the best defense?

THE PRESIDENT: You hardly need his assistance on that, but let him answer.

A I know that offense is the best defense, and a good offensive is the best defensive according to the principles of strategy.

Q Did these various operations plans include within them the time at which they were to be put into operation?

A I do not understand the meaning of your question.

Q Did the 1942 operations plan, vis-a-vis the



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1 Soviet Union, for example, contain a provision  
2 that it should go into effect at a particular time--  
3 that operations should commence at a particular time?

4 A There is no mention of any particular date  
5 for the commencement of the operations.

6 Q As a matter of fact, did not these plans  
7 provide that they should not go into effect until  
8 such time as orders were given by the Grand Imperial  
9 Headquarters?

10 A In my recollection there is no -- I do not  
11 recall any provisions of this matter in the operations  
12 plan. With respect to the commencement of hostilities  
13 against a third power this is within the -- this be-  
14 longs to the Imperial authority and is prohibited --  
15 correction: the commanding general of the Kwantung  
16 Army cannot do it on his own initiative, that is,  
17 commanding generals in the field were prohibited from  
18 taking their own initiative inasmuch as the authority  
19 belonged to the Imperial authority.

20 Q The 1939 annual plan for operations in con-  
21 nection with the Soviet Union was never carried out,  
22 was it?

23 A I do not think the operations plan were  
24 carried into effect.

25 Q The 1940 plan was not carried into effect,



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was it?

1           A     Inasmuch as the operations plan formulated  
2     by the General Staff office as against the Soviet  
3     Union was to be enforced only in the event of a  
4     general outbreak of general hostilities between Japan  
5     and the Soviet Union, such plans were not carried  
6     out until the 8th of August, 1945, when those  
7     hostilities began.

9           Q     In drawing your annual plans for operations  
10    against the Soviet Union, did you use certain estimates  
11    of the Soviet strength on which to base your plans?

12          A     Matters with respect to Soviet national  
13    strength, military strength and operational ability  
14    were studied by the Second Department of the General  
15    Staff office; in other words, the department handling  
16    military intelligence. I do not know the details.

17          Q     But is it not true that the First Section  
18    of the General Staff office in preparing operations  
19    plans took into account the estimates of Soviet  
20    strength, in this case prepared by the Second Section?

21          A     Yes, they were taken into account.

22          Q     And what did those estimates show as to the  
23    relative strength of the Japanese Kwantung Army and  
24    the Soviet Far Eastern Army during the years in which  
25    you were working in this section?



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1 MR. GOLUNSKY: If the Tribunal please,  
2 the prosecution objects to this question as being  
3 outside the scope of direct examination.

4 THE PRESIDENT: He could be asked whether  
5 the plans he drew up or assisted in drawing up were  
6 based on the strength of the Russian Army and, if so,  
7 on what strength. Major Blakeney's question is not  
8 substantially different, but I think in the form I  
9 suggested it would be less objectionable.

10 MR. BLAKENEY: The first half of the  
11 President's question I believe he has just answered.  
12 I will ask him the second half.

13 BY MR. BLAKENEY (Continued):

14 Q Upon what estimates of the strength of the  
15 Soviet Far Eastern Army did you base the operations  
16 plans in which you yourself participated during the  
17 years that you were working in the General Staff office?

18 A I do not recall the exact figures inasmuch  
19 as these figures change from year to year. However,  
20 what I do remember is in 1942, according to the estim-  
21 ate or judgment given by the Second Section of the  
22 General Staff office, the strength of the Far Eastern  
23 Soviet Army was about twenty-five divisions ground  
24 forces.  
25

Q Is that the only figure which you can



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remember at this time?

1           A     As to that I do not recall the exact figures.

2           Q     Are you able to remember and state how this  
3 strength of twenty-five divisions in 1942 compared  
4 with the strength of the Kwantung Army at the same  
5 period?

6           A     I recall that the forces under the control  
7 of the Commander-in-Chief of the Kwantung Army at  
8 that time was about fifteen divisions.

9           THE MONITOR: In Manchuria.

10          Q     And are you able to state in general whether  
11 a proportion somewhat similar to that obtained during  
12 the years that you were working on operations plans  
13 against the Soviet Union?

14          A     In comparing the strength between our forces  
15 and the forces of the opposite party, we followed the  
16 principle of estimating the air force, the strength  
17 of the air force, the strength of the ground force,  
18 the supply capacity in the rear, as well as topograph-  
19 ical factors; but as I do not recall the exact figures  
20 I cannot say at this time.

21          Q     Do you recall it as a fact that during the  
22 period when you were working on operations plans the  
23 Japanese strength of the Kwantung Army was always sub-  
24 stantially less than that which your Second Section  
25



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1 estimated to be the strength of the Soviet Far Eastern  
2 Army?

3 A What I said just a moment ago was the  
4 division strength on the ground; but as to general  
5 or overall strength we have to take into consideration  
6 air forces as well as other units which constitute an  
7 army.

8 Q I am asking you whether, taking those things  
9 into consideration, it was or was not a fact that  
10 during the period of time in question the strength  
11 of the Kwantung Army was less than what you estimated  
12 the strength of the Soviet Far Eastern Army to be?

13 A Do you mean the number of soldiers?

14 Q That is one item. Suppose you give us the  
15 answer in connection with that item first.

16 THE PRESIDENT: I think total strength will  
17 be sufficient for our purposes.

18 Q Then give us a comparison of the total  
19 strength in any way in which you are able to make the  
20 comparison.  
21

22 A I do not have -- my memory is not exact  
23 enough to give you a full and exact answer.

24 MR. BLAKENEY: That is all.

25 THE PRESIDENT: Mr. McManus.

MR. McMANUS: If your Honor please, I would



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1 like to ask this witness a few questions on duress  
2 only so if the questions go outside the scope of the  
3 affidavit I hope the Tribunal will bear with me.

4 THE PRESIDENT: We can concede you no  
5 liberty not allowed to others, Mr. McManus. The rule  
6 applies to all.

7 MR. McMANUS: Have I not the right --

8 THE PRESIDENT: Proceed to put your questions  
9 and we will tell you. That is the only way to decide.

10 CROSS-EXAMINATION (Continued)

11 BY MR. McMANUS:

12 Q Would you state, please, the circumstances  
13 of your internment?

14 A Early September last year I went to Habarovsk  
15 in the company of the Commander-in-Chief, General  
16 YAMADA.

17 Q Where have you been since then?

18 A I was with the Commander-in-Chief for two  
19 months since then, and then was taken to a camp to-  
20 gether with military personnel in general, officers  
21 and men.

22 Q Are you presently charged with a crime?

23 A No.

24 Q How long have you been in Tokyo?

25 A I came here the 17th of last month.



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1 Q Have you had any conversations with anyone  
2 since you have been here?

3 THE PRESIDENT: About this case.

4 Q About this case?

5 A Only two -- Colonel Rosenblit and Chief  
6 Prosecutor, Mr. Keenan.

7 Q When was the last conversation you had with  
8 a member of the prosecution staff?

9 A Two nights ago I met Mr. Keenan.

10 Q Did you know Mr. Semyonov and Mr. Rodzayevsky?

11 A I do not.

12 Q Didn't you meet them in an internment camp?

13 A No, I have not. I have not met them.

14 Q Do you know the fact that they have been  
15 executed?

16 A No, I do not.

17 THE PRESIDENT: What is this, a threat or a  
18 promise or what?

19 MR. McMANUS: I beg your pardon, your Honor.

20 THE PRESIDENT: Is this a threat?

21 MR. McMANUS: Your Honor, I would like to  
22 find out whether or not the fact that these men have  
23 been executed has any bearing on this statement which  
24 was made the 26th, two days ago, by this witness -- or  
25 the 27th of September, I am sorry. I would just like



SEJIMA

CROSS

1 to point out to the Tribunal, if the Court please,  
2 at least I was endeavoring to find out whether or  
3 not the fact that these men who are not produced  
4 here and who have been executed might have had some  
5 bearing upon the testimony that this witness is  
6 offering right now.

7 THE PRESIDENT: Is there any further  
8 cross-examination?

9 No further cross-examination.

10 DR. KIOSE: No cross.

11 COLONEL ROSENBLIT: There is a question in  
12 redirect examination.

13 REDIRECT EXAMINATION

14 BY COLONEL ROSENBLIT:

15 Q When answering the defense counsel's  
16 question you said that no people other than those  
17 who worked in the Army General Staff participated  
18 in the working out of the operation plans. Do you  
19 or do you not know whether the brains of the Army  
20 General Staff were given by superior governmental  
21 officers or superior officials in the country any  
22 assignments with regard to the operation plans in-  
23 cluding operation plans against the U.S.S.R.?

24 A As I understand, there is no interference  
25 in the formulation of operational plans by the



SEJIMA

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General Staff office.

1 THE PRESIDENT: I did not hear the English  
2 answer. We heard no answer in English.

3 THE INTERPRETER: I will repeat, sir. In  
4 so far as I know there is no outside interference  
5 in the formulation of operational plans by the  
6 General Staff office.

7 THE PRESIDENT: The witness is released on  
8 the usual terms.

9 (Whereupon, the witness was excused.)

10 COLONEL ROSENBLIT: To corroborate Lieutenant  
11 Colonel SEJIMA, Ryuzo's testimony concerning the 1942  
12 plan of war in the Kwantung Army, I shall submit in  
13 evidence the photostatic copy of the statement of  
14 General KITA, Seiichi, written by himself in the  
15 Japanese language on April 20 through April 23, 1946.  
16 General KITA, Seiichi, was commanding general of the  
17 6th Army of the Kwantung Army from October, 1941,  
18 until October, 1944, and from October, 1944, he was  
19 commanding general of the first front of the Kwantung  
20 Army, prosecution's document No. 2467.

21 THE PRESIDENT: Mr. Logan.

22 MR. LOGAN: We object to that part of this  
23 affidavit going into evidence which is contained on  
24 page five, the last paragraph. The first sentence in  
25



1 that paragraph is a conclusion of this particular  
2 witness which is not based on any facts set forth  
3 in his affidavit and attempting to fix responsibility  
4 for certain acts, which is usurping the functions of  
5 this Court and not within the province of the witness.

6 I might remind the Tribunal that a similar  
7 statement was stricken from another affidavit last  
8 Friday.

9 THE PRESIDENT: We think we should read the  
10 whole of the affidavit before we come to a conclusion.  
11 If the statement is as bare as Mr. Logan suggests,  
12 it may have no value.

13 The document is admitted on the usual terms.

14 CLERK OF THE COURT: Prosecution's document  
15 2467 will receive exhibit No. 835.  
16

17 (Whereupon, the document above  
18 referred to was marked prosecution's exhibit  
19 No. 835 and was received in evidence.)  
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COLONEL ROSENBLIT:

1 As KITA, Seichi, puts it in his testimony,  
2 the fact that he held those offices gave him an oppor-  
3 tunity of getting fully acquainted with the plans of  
4 war against the U.S.S.R. that were in the Kwantung  
5 Army at that time; he likewise was able to familiarize  
6 himself with the preparatory measures carried on in  
7 connection with war against the U.S.S.R.

8 If the Tribunal please, I quote from page 12:

9 "Preparatory Measures.

10 "Heike District: In the peace time there were  
11 in this district two divisions of the Fourth Army and  
12 one detachment of border guards. The Army Headquarters  
13 was at Sunwu. Before the war was opened against Soviet  
14 Russia the Second Area Army and Northern Army were to  
15 be set up at Tsitsikar and Heike respectively."

16 Correction, please: Not the Northern Army;  
17 the N Army.

18 "N Army seemed to be changed to 8th Army later.  
19 This formation was to be made by diverting four divi-  
20 sions from China and Japan. Consequently the Second  
21 Area Army was to have attained a strength of six divi-  
22 sions before the outbreak of war, that is. There were  
23 three divisions of the 4th Army at Sunwu, two divisions  
24 of 8th Army at Heike and one division under the direct  
25 control of the Area Army. Besides, the 6th Army under



1 the Second Area Army consisting of the 23d Division  
2 and the Arshan detachment (about one division strong)  
3 should be increased by the addition of another divi-  
4 sion after the outbreak of war. Two more divisions were  
5 to be added in the future.

6 "Maritime Province District: Those stationed  
7 in peace time in this district were three divisions of  
8 the 5th Army, three divisions of the 3rd Army, the  
9 71st Division at Hunchung and one division under the  
10 direct control of the Kwantung Army at Chiamusu -- eight  
11 divisions in all together with two tank divisions.  
12 In 1941, 20th Army Headquarters was established at  
13 Tsining and to that army was given one division each  
14 from the 3rd, and 5th Armies. Prior to the outbreak of  
15 war, the 1st Area Army Headquarters, and the 2nd Army  
16 Headquarters were to be set up at Mutanchiang and  
17 Chientao respectively according to Plan B."

18 Correction: According to Plan Otsu.

19 "Eight more divisions were to be transferred  
20 to this district from Japan and China, making the First  
21 Area Army possess fifteen divisions and two tank divi-  
22 sions, that is, three divisions and one tank division  
23 of the 5th Army, five divisions and one tank division  
24 of the 20th Army, three divisions of the 3rd Army, two  
25 divisions of the 2nd Army and two divisions under the



1 direct control of the First Area Army. In addition  
2 there was one air force army under the direct control  
3 of the Kwantung Army Commander with 1,000 planes. The  
4 Kwantung Army was expected to be in the above condition  
5 on the Eastern, Northern and Western fronts just before  
6 the opening of war against the U.S.S.R. according to  
7 the Plan Otsu.

8 "Offensive Plan: In accordance with the  
9 offensive Plan Otsu we expected to seize the entire  
10 Far East as far as Baikal in four successive steps.  
11 In the first step the 4th and the N Armies of the  
12 Second Area Army were to carry out demonstrations on  
13 the Russian border near Sunwa and Heike, pretending  
14 offensive preparations by occasionally shooting into  
15 Russian territory. No actual offensive, however, was  
16 to be made. Thus the Red Army was expected to be  
17 fettered within that area. Should the Red Army start  
18 an offensive it must be checked. The 6th Army should  
19 maintain its positions at Hailor and Arhshan. In case  
20 an attack was made by the Red Army from Chita via  
21 Manchuria it must be checked by keeping these posi-  
22 tions firm. In this case, the 1st Area Army in the  
23 Maritime Province District would act decisively on the  
24 offensive according to the following plan."  
25

Then follows a detailed description of the



1 operation of each army of the 1st Front, which I leave  
2 out, and pass directly to the summing up of the first  
3 stage operations.

4 Quote from page 13:

5 "All these forces were to press the Red Army  
6 at Voroshilov, and part of them, after seizing Voro-  
7 shilov, were to cooperate with the Japanese Navy at  
8 Yuanshan to capture Vladivostok by envelopment. This  
9 was to end the first stage. Its chief object was to  
10 secure Japan proper and the industrial areas of Man-  
11 churia from the Red Army's air raids from the Maritime  
12 Province district, by entirely occupying the district.

13 "Second Stage: In case the first stage of  
14 the offensive was successful, the main force of the  
15 First Area Army was to advance Northward toward  
16 Habarovska along the railroad, leaving part of the  
17 Army in the Maritime Province to maintain the occupied  
18 area. The division stationed at Chiamusu would occupy  
19 the positions facing Leninsk to protect the wings of the  
20 First and Second Armies in the vicinity. At this time  
21 the 4th and the N Armies of the Second Area Army would  
22 cooperate with the First Area Army and commence an  
23 offensive operation from Heike and its vicinity; cross  
24 the Amur; seize Blagoveshchensk, Kuibyshevsk and  
25 Svobodni and cut off the Siberian Railway. One part



1 of the forces were to defend the West and the main  
2 force was to move eastward along the railway line to  
3 Habarovsk. Then the First and the Second Area Armies  
4 were to cooperate in attacking in a decisive battle  
5 the Red Army from both sides and occupy Khabarovsk.  
6 This was to complete the second stage.

7 "Third Stage: After the occupation of  
8 Khabarovsk the Second Area Army would immediately turn  
9 westward to make preparations for the reinforcements  
10 necessary for the future offensive operations upon the  
11 Zabaikalye. At this time the 6th Army at Hailar was  
12 to be reinforced raising its strength to four divisions  
13 which were to prepare to advance the attack. In the  
14 Maritime Province the First Area Army was to secure  
15 the important districts and the rear of the Second  
16 Area Army. The main force of the Second Area Army  
17 would turn West after completing preparations and  
18 commence the advance to Chita along the railway. As  
19 soon as the Second Area Army's main force reached Moga-  
20 cha, the 6th Army was immediately to start the attack  
21 by breaking through the border near Sanho and Man-  
22 churia. And the 6th Army was to act in cooperation  
23 with the Second Area Army's main force and advance to  
24 Chita and its southern area. On seizing Chita and its  
25 vicinity, the Second Area Army was to secure important



1 districts in the West; and thus the operation of the  
2 third stage was to come to a close.

3 "In the fourth stage it was planned to conti-  
4 nue the offensive until the Zabarkalye as far as Lake  
5 Baikal was seized. But I do not know about the offen-  
6 sive plan of the fourth stage.

7 "Operations Regarding Outer Mongolia: In  
8 the third stage, at the same time as the commencement of  
9 the advance of the 6th Army, the Arhshan Detachment  
10 (approximately one division) was to have been brought  
11 under the direct control of the Second Area Army to  
12 combine with and take command of the Mongolian force  
13 in Manchuria (approximately one division) and advance  
14 to Chita from Arhshan via Tampsakbulak, Baintumen and  
15 Ulan-Orasomon. This unit would cover the right wing  
16 of the Second Area Army by marching through the eastern  
17 part of Outer Mongolia.

18 "Maintaining coordination of all Military  
19 Operations the Imperial Headquarters was to transfer  
20 one mechanized army group from North China and to have  
21 it begin strategic operations from Kalgan toward  
22 Ulan-Bator. But I am not able to explain the plan for  
23 the future development of the offensive action since  
24 I don't know it. The general outline of the offensive  
25 plan against Soviet Russia is as above. This plan for



1 the offensive operation against the Soviet Union in  
2 1942 was set up by the General Staff and the Kwantung  
3 Army; it was revised every year thereafter. This plan  
4 for Japanese military measures existed till around the  
5 middle of 1944. Since Japan faced difficult condi-  
6 tions in the battle field of Greater East Asia War,  
7 she could not carry out this plan."



1           Mr. President and members of the Interna-  
2 tional Tribunal, I should like to draw your attention  
3 to the evidence that the defendant UMEZU, Yoshijiri  
4 was Commanding General of the Kwantung Army at that  
5 time and that he himself took part in working out the  
6 plans of an aggressive war against the U. S. S. R.,  
7 whereas the defendant TOJO, Hideki, was Prime Minister  
8 and concurrently War Minister of Japan at that time.

9           THE PRESIDENT: Major Blakeney.

10          MR. BLAKENEY: I wish to make the usual  
11 request for information concerning the status of this  
12 witness, and the usual request for direction that he  
13 be produced for cross-examination.

14          THE PRESIDENT: Mr. Smith.

15          MR. SMITH: If your Honors please, in the  
16 last paragraph at the bottom of page 4, first sen-  
17 tence, I ask your Honors to strike it out. It says:

18                "In 1935 Japan, by resorting to every pos-  
19 sible means, induced Soviet Russia to sell the right  
20 and interest of the Chinese Eastern Railways."

21               That is a bald statement, not supported by  
22 any facts anywhere in this statement, and infringes  
23 the province of the Court, and I submit to your  
24 Honors a statement of that sort ought not to be per-  
25 mitted in evidence in this case.



1 THE PRESIDENT: We think it is irrelevant  
2 to any issue that is raised in the Indictment. The  
3 objection is upheld.

4 We had better settle the question raised  
5 by Major Blakeney in the first instance -- raised  
6 by Mr. Logan, rather. What is part of the affidavit  
7 can be said to support that bare statement as to the  
8 responsibility of various individuals.

9 THE PRESIDENT: Minister Golunsky.

10 MR. GOLUNSKY: The part objected to by the  
11 learned counsel is half a statement of responsibility  
12 and half a list of different people who held official  
13 positions in some way connected with the military  
14 activities in Manchuria, and inasmuch as we can es-  
15 tablish that from other sources we do not particularly  
16 insist on this part of the affidavit.

17 THE PRESIDENT: The part objected to by  
18 Mr. Logan amounts to the swearing of issues without  
19 any supporting fact, and will be disregarded. The  
20 objection is upheld.

21 Colonel Rosenblit.

22 COLONEL ROSENBLIT: If the Tribunal please,  
23 I shall call for direct examination the witness,  
24 MATSUMURA, Tomokatsu, former Major-General of the  
25 Japanese Army, who from October, 1941, through



1 August, 1943, worked in the Second Department of the  
2 Japanese Army General Staff, and from August, 1943,  
3 until the surrender worked in the Kwantung Army  
4 Headquarters, first in the capacity of Chief of the  
5 First (operations) Section, and since March, 1945, as  
6 Deputy Chief of the Kwantung Army Headquarters.

7 THE PRESIDENT: Mr. Logan's application for  
8 the production of the deponent KITA will be considered.

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MATSUMURA

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1 T O M O K A T S U M A T S U M U R A, called as a  
2 witness on behalf of the prosecution, being first  
3 duly sworn, testified as follows:

## DIRECT EXAMINATION

BY COLONEL ROSENBLIT:

6 Q Mr. Witness, tell the Tribunal your name and  
7 your first name.

8 A MATSUMURA, Tomokatsu.

9 Q Your age?

10 A Born 32nd year of Meiji, 1899.

11 Q You worked in the Army General Staff in the  
12 capacity of Chief of the Fifth Section of the Second  
13 Department from October, 1941, through August, 1943,  
14 didn't you?

15 A Yes, Chief of the Fifth Section, Second Division.

16 Q Did you or did you not occupy the position of  
17 Chief of First (operations) Section of the Kwantung  
18 Army Headquarters from August, 1943, until March, 1945?

19 A Yes, I occupied that position.

20 Q Are you a war prisoner of the Soviet Army  
21 at present?

22 A Yes, I am.

23 Q Mr. Witness, you are being shown prosecution  
24 document No. 2672 in the Japanese language, which is  
25 your affidavit of September 27, 1946. Look through



1 this document. Is it or is it not written in your  
2 own hand?

3 A Yes, that is mine.

4 Q Does the signature which appears on all the  
5 pages of this affidavit belong to you?

6 A Yes.

7 Q Are the contents of your affidavit true to  
8 fact?

9 A Yes.

10 COLONEL ROSENBLIT: I tender in evidence to  
11 the Tribunal prosecution document No. 2672, which is  
12 an affidavit of the witness MATSUMURA of September 27,  
13 1946, written in the Japanese language.

14 THE PRESIDENT: Admitted on the usual terms.

15 CLERK OF THE COURT: Prosecution document  
16 No. 2672 will receive exhibit No. 836.

17 (Whereupon, the above-mentioned  
18 document was marked prosecution's exhibit  
19 No. 836 and received in evidence.)

20 COLONEL ROSENBLIT: If the Tribunal please,  
21 I shall read the full text of this affidavit:  
22

23 "I am MATSUMURA, Tomokatsu, formerly Major-  
24 General of the Japanese Army, and was born in 1899.  
25 I state here as follows:-

"I served in the Japanese Army General



1 Staff Office in various capacities in and after 1929.  
2 In October of 1941, I became chief of the 5th section  
3 (Soviet Russian Intelligence) of the 2nd dept. (In-  
4 telligence) in the Army General Staff Office. In  
5 August of 1943, I was transferred from that post to  
6 that of the chief of the 1st section (operations) of  
7 the Kwantung Army Headquarters. In March 1945 I was  
8 appointed Vice-Chief of Staff, Kwantung Army, remain-  
9 ing in that post until the surrender.

10 "I testify as follows the facts I knew in  
11 relation to my duties during the period mentioned  
12 above:-

13 "1) Having arrived at the Headquarters of  
14 the Kwantung Army in 1943, I, as the Chief of the  
15 Strategy Section, was first of all informed of the  
16 operations plan kept by the Headquarters. At this  
17 time I was informed of the directives of the Army Gen-  
18 eral Staff concerning the operations plan against  
19 Soviet Russia for 1942 and the operations plan itself  
20 of the Kwantung Army Headquarters based upon the  
21 said directives.

22 "The directives of the Army General Staff  
23 instructed the Kwantung Army Headquarters to form an  
24 operations plan against Soviet Russia with the occu-  
25 pation of the Maritime Provinces of Soviet Russia and



1 the destruction of the air bases in the Maritime  
2 Province as the general objectives, and also to  
3 focus the principal attack upon Voroshilov. It was  
4 also written in the directives that the Kwantung  
5 Army should make preparations for further operations  
6 after occupation of the Maritime Provinces.

7 "The operations plan made by the Kwantung  
8 Army Headquarters according to the above directives  
9 in 1942 contained the following items:-

10 "1) The general tasks of the Kwantung Army.

11 "2) Distribution of military strength.

12 "3) The tasks of the different fronts and  
13 armies.

14 "The tasks as set forth in the afore-men-  
15 tioned directive of the Army General Staff were indi-  
16 cated as the general tasks of the Kwantung Army.

17 "In the item of the distribution of military  
18 strength, it was planned that the First Front, the  
19 Second Front and the Sixth Army should participate in  
20 the operation against Soviet Russia. The First Front  
21 comprised 4 armies (the 2nd, 3rd, 20th, 5th Army),  
22 consisting of 15 infantry divisions, and 2 tank div-  
23 isions. Furthermore, besides the First Front Armies,  
24 one independent infantry division was stationed at  
25 CHIAMUSU in order to protect the left wing of the First



1 Area Army.

2 "The Second Front was planned to comprise  
3 two Armies (the Fourth Army and a certain other Army)  
4 consisting of seven divisions; and the Sixth Army  
5 consisting of four divisions. Besides these there  
6 were three infantry divisions as the general reserve  
7 of the Kwantung Army and the Second Air Force Army  
8 consisting of four air divisions were under direct  
9 control of the Kwantung Army.

10 "In the item concerning the tasks of the  
11 different fronts and armies, the task of the First  
12 Front was indicated as follows: that the Second Army  
13 should attack from CHIENAO Area toward the Southern  
14 USSURI Area; that the Third Army should attack from  
15 TUNGNING Area toward VOROSHILOV; that the Twentieth  
16 Army should attack from the area to the west of Lake  
17 Khanka toward VOROSHILOV; and that the Fifth Army  
18 should attack from HUTOW Area toward IMAN Area and  
19 thereby cut off the enemy's communications extending  
20 from south to north and later have one part of the  
21 force cover the north and have another part advance  
22 southward to facilitate the attack of the main force  
23 on VOROSHILOV. Although it is not expressly indicated  
24 in the plan, it can be presumed that the occupation of  
25 VLADIVOSTOK was to follow that of VOROSHILOV.



1           "The tasks of the Second Front were indi-  
2 cated as follows: that the Fourth Army and a certain  
3 other Army should be stationed in the SUN-WU and HEI-  
4 HO Areas respectively, where they were to check the  
5 Soviet Army in the AMUR River Area.



1           "The task of the Sixth Army was to stand  
2 on the defensive in the HSINGAN mountain-range against  
3 the Soviet Army from ZABAIKALYE and cover the offensive  
4 operation of the First Front.

5           "The operations plan against Soviet  
6 Russia for 1942 was signed by General UMEZU,  
7 Commander of the Kwantung Army, Lieutenant-General  
8 KASAHARA, Chief of Staff, and Colonel TAMURA, Chief  
9 of the Operations Section.

10           "It was not clear to me whether a war  
11 against the Soviet Union would be carried on. I  
12 know only of matters related to operations. Matters  
13 concerning the political aims of war against Soviet  
14 Russia were under the authority of the government,  
15 and I know nothing about them. As for the opera-  
16 tions plan against Soviet Russia in 1943 the Army  
17 General Staff gave us no new directives whatever.  
18 Therefore, according to the general practice in  
19 the Army, the plan for 1942 was followed in 1943  
20 as well.

21           "Immediately after my assumption of office  
22 in October 1941 as Chief of the 5th Section (Soviet-  
23 relations) of the 2nd Department, Lieutenant-General  
24 OKAMOTO, Seifuku, the Chief of the 2nd Department,  
25 gave me an order in his office to deliver the



1 intelligence relating to the Soviet Union collected  
2 by the 5th Section to the 16th Section (GERMAN  
3 RELATIONS) of the 2nd Department. On this  
4 occasion, Lt. General OKAMOTO explained to me  
5 that the intelligence was wanted by KRETSCHMAR,  
6 German military attache. Thenceforth, in accordance  
7 with the orders given by Lt. General OKAMOTO, Seifuku,  
8 Chief of the 2nd Department, and his successor Lt.  
9 General ARISUE, Seizo, I systematically forwarded  
10 to the 16th Section (GERMAN RELATIONS) for Colonel  
11 KRETSCHMAR the intelligence regarding Soviet mili-  
12 tary forces, their disposition in the Far East,  
13 war potential of the Soviet Union, movement of  
14 Soviet divisions to the west from the Far East,  
15 internal movements of Soviet strength, and recon-  
16 struction of the withdrawn Soviet industries.  
17 These intelligences were based upon materials  
18 reported to the General Staff Office from Japanese  
19 military attaches in MOSCOW and various other  
20 intelligence sources. They were arranged by  
21 officers of my section and after my examination  
22 were delivered directly to the 16th Section.  
23 Sometimes important ones were delivered to the  
24 16th Section after I had examined them and after  
25 Chief of the 2nd Department had gone over them.



1 "We used to deliver intelligence to the  
2 16th Section (in charge of German affairs) about  
3 once a month.

4 "The above was written by my own hand  
5 and the contents are true."

6 The affidavit is signed by the witness  
7 MATSUMURA, Tomokatsu September 27, 1946, and the  
8 witness was duly sworn in the presence of the  
9 U.S. Army Officers Captain Roland Schwartz and  
10 2nd Lieutenant Hattori.

11 The witness MATSUMURA, Tomokatsu may  
12 now be placed at the disposal of the Defense  
13 Counsel for cross-examination.

14 THE PRESIDENT: We will recess now for  
15 fifteen minutes.

16 (Whereupon, at 1440, a recess was  
17 taken until 1455, after which the proceedings  
18 were resumed as follows.)  
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1 MARSHALL OF THE COURT: The International  
2 Military Tribunal for the Far East is now resumed.

3 THE PRESIDENT: Dr. KIYOSE.

4 DR. KIYOSE: I should like to make a brief  
5 cross-examination.

6  
7 CROSS-EXAMINATION

8 BY DR. KIYOSE:

9 Q In your affidavit, that is in the fourth  
10 page of the Japanese affidavit or in the third page --  
11 third paragraph of your affidavit in English, you say  
12 that matters concerning the political aims of war against  
13 Soviet Russia were under the authority of the govern-  
14 ment and I know nothing about them. Now, may I under-  
15 stand that the fact that our country had a strategic  
16 plan against Soviet Russia did not mean that our  
17 country had the intention of waging a war against Soviet  
18 Russia? Am I allowed to understand it in that fashion?

19 A That is an entirely different question.

20 Q You further state that questions of policy  
21 were determined by the government and I, myself, do  
22 not know anything about them. Does this mean that not  
23 only you but all of you in high command, who are  
24 engaged in duties within the high command, did not know  
25 whether the government had intention of waging war



MATSUMURA

CROSS

1     against a foreign country or not?

2             THE MONITOR: Correction: That the high  
3     command or any branches thereof did not interfere  
4     in questions of policy which were determined by the  
5     government.

6             A     I am speaking only of myself and others who  
7     are in similar positions.

8             Q     Was it customary to formulate strategic plans  
9     against any foreign countries whether or not the govern-  
10    ment itself had the intention of waging a war against  
11    those particular countries?

12            THE MONITOR: Slight correction: Did the  
13    Japanese government formulate any strategic plans any-  
14    way?

15            A     I saw the operations plan only in my capacity  
16    as chief of the operations section of the Kwantung  
17    Army Headquarters. When I was in other positions I  
18    didn't see such plans, so I can't testify with respect  
19    to them.

20            Q     You belonged to the Kwantung Army in the year  
21    1945 instead of the years 1942 and 1943 as you state  
22    in your affidavit, isn't that right? Tell me about  
23    operational plans entertained by the Kwantung Army in  
24    the years 1944 and 1945.

25            A     In 1944 and 1945 a separate operations plan



MATSUMURA

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1 for defensive purposes were formulated.

2 Q Can you outline those plans briefly?

3 A The plan for 1944 was generally operations to  
4 be carried out in the border areas. Defensive operations  
5 in the border areas. The operational plans for 1945  
6 was an internal defensive plan constituting various  
7 plans for retreat along the southeastern border of  
8 region of Manchuria and to carry on -- for the purpose  
9 of carrying on a holding operation.

10 Q There is something which I don't understand  
11 there. That is the operational plan in which you  
12 personally participated weren't there. Why are they  
13 not mentioned in your affidavit?

14 A I only spoke in answer to questions and that  
15 was all that was asked of me during the interrogation.

16 Q Does that mean that no question was asked  
17 with respect to this point or that it was omitted  
18 later on very close study as unnecessary?

19 A When preparing the affidavit there was no  
20 questions relative to this point.

21 Q How about when preparing the affidavit?

22 A Yes, when I was interrogated as a prisoner  
23 I spoke of the entire matter.

24 Q Then I shall ask you another question. Was  
25 there any instance of the strength of the Kwantung Army



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1 being deployed and decreased during your tenure of  
2 office in the Kwantung Army?

3 A Yes.

4 Q When did it -- at about what time did it occur  
5 and what was the importance of the decrease?

6 A From the summer of 1943 up to the end of the  
7 war the Kwantung Army, units of the Kwantung Army were  
8 deployed greatly and the Kwantung Army was reorganized.  
9 I can't recall exactly when or to what extent such a  
10 deployment and decrease took place but with respect  
11 to the subject, the question of decrease, the strength  
12 may have been decreased but the number of military  
13 personnel not necessarily decreased. The number de-  
14 creased at time and then returned to the normal number,  
15 decreased again and returned to the normal number from  
16 time to time.

17 Q Was the quality of the newly recruited troops --  
18 was not the quality of the newly recruited troops in-  
19 ferior to the troops which had formerly been recruited  
20 by the Kwantung Army?

21 A Little by little the quality decreased.

22 Q My last question will be regarding intelligence.  
23 Second paragraph of your affidavit you write about  
24 information received from the military attache, Japanese  
25 Embassy in Moscow. But wasn't it a routine matter to



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1 receive information not only from the Japanese Embassy  
2 in the Soviet Union but from all the Japanese abroad  
3 to the intelligence section of the General Staff Office  
4 through the military attache?

5 A Yes, as you say.

6 DR. KIYOSE: That is all.

7 THE PRESIDENT: Before you go, Dr. KIYOSE,  
8 the word "deployed" was used. Was it intended to use  
9 the word "depleted"?

10 DR. KIYOSE: Yes.

11 MR. SHIMANOUCI: I am SHIMINOUCI, counsel  
12 for the defendant OSHIMA.

13

14 CROSS-EXAMINATION (Continued)

15 BY MR. SHIMANOUCI:

16 Q German Attache Kretschmar, whose name you  
17 mention in the last portion of your affidavit, where  
18 was he stationed as a military attache?

19 A In Tokyo.

20 Q Does that mean that the Japanese General  
21 Staff Office handed directly the intelligence  
22 concerning the Soviet Union to the German Embassy?

23 A I think so, but I didn't see that done myself  
24 with my own eyes.

25

MR. SHIMANOUCI: That is all.



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1 THE PRESIDENT: Major Furness.

2 CROSS-EXAMINATION (Continued)

3 BY MR. FURNESS:

4 Q General, on page 3 of your affidavit you  
5 testify that the materials, intelligence materials  
6 which you received were reported to the General Staff  
7 Office from Japanese military attaches in Moscow. Those  
8 military attaches were directly under the General  
9 Staff and reported directly to them, were they not?

10 A Yes.

11 Q Are you familiar with the duties of military  
12 attaches, Japanese as well as other countries, and if  
13 so is it not their duty as routine to gather military  
14 information and forward it to the General Staff of  
15 the country of which they are a national?

16 A Yes.

17 THE PRESIDENT: Major Blakeney.

18 CROSS-EXAMINATION (Continued)

19 BY MR. BLAKENEY:

20 Q Mr. Witness, in your affidavit you have stated  
21 that the plan for the 1942 operations of the Kwantung  
22 Army were forwarded by the General Staff and that upon  
23 the basis of those plans the Kwantung Army staff drew  
24 its plans. Was the plan which was forwarded from the  
25 General Staff Office in Tokyo an extremely complete



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1 plan?

2 A I don't get what you mean by the word "complete."

3 Q I mean, was the plan complete in the sense  
4 that it laid out orders for each army, group of each  
5 army, and perhaps each division in the event of  
6 hostilities?

7 A The order did not include such details.

8 Q Then the plan was drawn only in general detail.  
9 Is that your meaning?

10 A Yes. The plans received from the General  
11 Staff Office, yes.

12 Q And the plan then required that the staff of  
13 the Kwantung Army itself make plans for its implementa-  
14 tion, is that correct?

15 A Yes.

16 Q Nevertheless, the plan which came from Tokyo  
17 from the General Staff Office was the plan which laid  
18 out the policy?

19 A Not only general policy or aim or objective  
20 but the general strength of the Kwantung Army also.

21 Q That is to say that you, as a staff officer  
22 of the Kwantung Army, and the remainder of the staff  
23 of the Kwantung Army, and the commander in chief of  
24 the Kwantung Army, had no part in formulating the  
25 policy. Is that correct?



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1           A    Do you mean to formulate the policy received  
2   from the General Staff Office?

3           Q    No, I mean that the basic policy of what actions  
4   would be taken in case of hostilities, were those formu-  
5   lated by Tokyo and not by the Kwantung Army.

6           A    Yes, you are right.

7           Q    So that, although you state in your affidavit  
8   that the operations plan against Soviet Russia for  
9   1942 were signed by General UMEZU and others, actually  
10   the plan was drawn by them at the order of the General  
11   Staff Office in Tokyo, was it not?

12          A    The operational plans of the Kwantung Army  
13   itself was made, formulated, by the Kwantung Army.

14          Q    In accordance with the order received from  
15   the General Staff Office in Tokyo?

16          A    Yes.

17               THE PRESIDENT: Would he know to what extent  
18   the Commander in Chief of the Kwantung Army influenced  
19   the policy of Tokyo?

20               THE WITNESS: All that we know is that we  
21   must carry out the aims or policy determined and  
22   forwarded by the General Staff Office in Tokyo.

23               MR. BLAKENEY: That was all I intended to ask.

24               That concluding the cross-examination, I request  
25   the Tribunal to direct the Marshal to serve upon the



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1 witness the subpoena in his custody.

2 THE PRESIDENT: Mr. Chief Prosecutor.

3 MR. KEENAN: If I understand correctly, the  
4 cross-examination has been completed.

5 THE PRESIDENT: Does any other defense counsel  
6 desire to cross-examine?

7 MR. BLEWETT: No further cross-examination,  
8 your Honor.

9 MR. KEENAN: Therefore, Mr. President, since  
10 this witness is in the custody of the Soviet Union,  
11 I ask that he remain in that custody subject to the  
12 order of this Court that he return before this Tri-  
13 bunal to give testimony at the appropriate time when  
14 he is desired by defense counsel, and that he not be  
15 required to remain here in the interim. I have the  
16 assurance from the Soviet Associate Prosecutor, which  
17 I might state has been always found to be highly  
18 dependable, that this witness will be available at the  
19 Court's direction at whatever time is required, of course,  
20 for the legitimate purposes of this trial.

21 I think I ought to state to this Court that  
22 the testimony and services in that regard of the witness  
23 MATSUMURA and also SEJIMA are required for other pur-  
24 poses in other investigations and trials pending in the  
25 Soviet at the present time. And that is the reason



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1 for this request. And as witnesses in those proceed-  
2 ings in the Soviet and in proceedings that are recognized  
3 and provided for in the Charter establishing this Court  
4 and these proceedings too.



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1 THE PRESIDENT: Major Blakeney.

2 MR. BLAKENEY: I cannot conceive how this  
3 matter is argueable.

4 THE PRESIDENT: Well, if you do not want to  
5 argue it, we can give our decision. But I might  
6 need your assistance. It seems to me that the sub-  
7 poena already served on him has placed him effective-  
8 ly in the custody of this Tribunal. And the position  
9 will not be improved if the second subpoena issued  
10 by the defense is served. The position will be  
11 exactly the same.

12 Now, we must hold him here until we have  
13 disposed of his evidence. He is held by the Rus-  
14 sian authorities at the direction of this Court  
15 which is an international court comprising eleven  
16 nations and which does not consist of merely one  
17 nation. The defense should be at liberty, if they  
18 persist, to serve the subpoena on him and also to  
19 take a proof of his evidence, as I suggested yester-  
20 day.

21 Subject to that, he is to remain in the cus-  
22 tody of the Russian authorities, but he is to be  
23 dealt with by them as directed by the Court so far  
24 as his movements are concerned. If it is desired to  
25 take him out of the jurisdiction, then that must be



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1 the subject of a separate application supported by  
2 evidence.

3 I have not definitely judged. That is what  
4 I propose, subject to what you have to say, Major  
5 Blakeney.

6 MR. BLAKENEY: If the President's remarks  
7 constitute a direction that the witness be made  
8 available for consultation with the defense, that is  
9 all we desire.

10 THE PRESIDENT: My colleagues may desire  
11 to qualify what I said. I shall consult them.

12 (Whereupon, a discussion was had  
13 off the record.)

14 In carrying out that direction, we suggest  
15 that you arrange with the Chief Prosecutor for a time  
16 at which the proof will be taken.

17 MR. BLAKENEY: Privately, of course?

18 THE PRESIDENT: With all proper safeguards  
19 as to his custody, but privately, otherwise.

20 If you have any difference with the prose-  
21 cution, you can ventilate it here later.

22 MR. BLAKENEY: That is eminently satisfac-  
23 tory. I have no desire to become his guardian.

24 THE PRESIDENT: Colonel Rosenblitt.

25 The witness is released on the usual terms.



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1 He is still in the custody of the Court, neverthe-  
2 less.

3 (Whereupon, the witness was ex-  
4 cused.)

5 COLONEL ROSENBLIT: As evidence of serious  
6 preparations of Japan for an attack against the  
7 USSR as far back as 1943, I shall produce in evi-  
8 dence the affidavit of March 29, 1946 of the Japan-  
9 ese Major General OTSUBA, Kajuma, who, in 1943, was  
10 chief of the headquarters of the 23rd Japanese di-  
11 vision, dislocated in Manchuria at that time, prose-  
12 cution document No. 1981.

13 THE PRESIDENT: Mr. Logan.

14 MR. LOGAN: The defense objects to the last  
15 question and answer set forth in the affidavit on  
16 page ten thereof on the ground that it is a question  
17 of assuming facts not in evidence. Secondly, we ob-  
18 ject to the form of the question, and it is asking  
19 for conclusions which are unsupported by the facts  
20 set forth in the affidavit. And furthermore, it is  
21 calling for conclusions which would usurp the func-  
22 tions of the Court in its endeavor to determine re-  
23 sponsibility, if any, of these accused.

24 MR. GOLUNSKY: If the Tribunal please, we  
25 agree that this affidavit be accepted as evidence



1 with the exception of the last question and answer.

2 THE PRESIDENT: The position is covered by  
3 our earlier decision this afternoon. The objection  
4 is allowed.

5 Colonel Rosenblitt.

6 COLONEL ROSENBLIT: I want to call the  
7 Tribunal's attention to the question, line 3 on  
8 page 9 of the Japanese original, where the word  
9 "plans" is missing by mistake.

10 It is evident from Major General OTSUBA's  
11 testimony that in August 1943, he was present at a  
12 conference at the headquarters of the Sixth Army in  
13 the Town of Khailar, which conference was devoted  
14 to the question of the coming military operations of  
15 the Sixth Army in the war against the USSR. The  
16 conference was conducted by Major General IGETA,  
17 chief of the headquarters of the Sixth Army.

18 Here it is as described by OTSUBA.

19 I did not get the exhibit number.

20 THE PRESIDENT: Admitted on the usual terms.

21 CLERK OF THE COURT: Prosecution's document  
22 No. 1981 will receive exhibit No. 837.

23 (Whereupon, the document above  
24 mentioned was marked prosecution's exhibit  
25 No. 837 and received in evidence.)



1 COLONEL ROSENBLIT: I quote from page 6  
2 of the English text:

3 "A As the Kwantung Army was to take the  
4 offensive in the areas of the Maritime Province during  
5 the first step of the war against the USSR, the 6th  
6 Army was to go on the defensive in its area. There-  
7 fore, through the first two days of the conference,  
8 the plan of defense in the area of the 6th Army was  
9 discussed. It was the scheme of the commander that  
10 we were to fight to death against the enemy in the  
11 Zabaikalye Area until new divisions would arrive to  
12 the Second front. On the third day of the conference,  
13 the offensive operation was studied. The operation  
14 was to be executed by the Front and the Army, rein-  
15 forced by new formations. In this occasion, the 2nd  
16 front was to attack in the direction of Chita. The  
17 commander's plan was, after concentrating the main  
18 body in the area of Hailar, to make an attack from  
19 the southern district of Lake Dalainoor by an en-  
20 circlement movement, behind the right wing of the  
21 Zabaikalye front and advance to Borzia Area, destroy-  
22 ing the enemy forces and cutting off their retreat."

23 I skip a number of lines and quote further:  
24

25 "A At least twenty divisions were re-  
quired in order to achieve the objective of attack



1 in the area of Chita. However, our strength in this  
2 area was sufficient just to make a strong resistance.  
3 Therefore, in order to attack, reinforcement of be-  
4 tween fifteen and twenty divisions from other areas  
5 was necessary. The regrouping of the Kwantung Army  
6 could be done only after the occupation of the  
7 Soviet Maritime Province and the accomplishment of  
8 the initial stage of war."

9 Now, if the Tribunal please, I shall present  
10 the affidavit of one more witness, KUSABA, Tatsumi,  
11 former Lieutenant-General of the Japanese Army.

12 MR. FURNESS: If the Court please, we make  
13 the usual request that this witness be produced for  
14 cross-examination and that we be advised of his stat-  
15 us.

16 COLONEL ROSENBLIT: Now, if the Tribunal  
17 please, I shall present the affidavit of one more  
18 witness, KUSABA, Tatsumi, former Lieutenant General  
19 of the Japanese Army. The Tribunal are aware of  
20 the fact that KUSABA was offered --

21 (Whereupon, Mr. Furness began to  
22 speak at the lectern.)

23 THE PRESIDENT: I will call on you, Major  
24 Furness, when there is nobody else talking.

25 Major Furness, your application -- the



1 production of the witness you mentioned -- will be  
2 considered.

3 MR. FURNESS: I am referring to the affiant,  
4 Kazuma OTSUBO, exhibit 837.

5 COLONEL ROSENBLIT: The Tribunal are aware  
6 of the fact that KUSABA was offered to be intro-  
7 duced as a witness by the prosecution and was accord -  
8 ingly summoned by the Tribunal. He was brought from  
9 the Soviet Union to Tokyo, and on the night of Sep-  
10 tember 20, committed suicide. I submit to the Tri-  
11 bunal a death certificate given by Major General  
12 Kislenko, Deputy Member for the USSR, of the Allied  
13 Council for Japan of October 9, 1946.

14 Thus we are not able to produce the witness  
15 KUSABA in court, and we can only present to the Tri-  
16 bunal his affidavit written by himself in the Japan-  
17 ese language in Khabarovsk on March 25, 1946.

18 I offer in evidence this affidavit, prose-  
19 cution document No. 1982.

20 MR. SHIMANOUCHI: I am SHIMANOUCHI, counsel  
21 for the accused OSHIMA. I refer the Tribunal to  
22 prosecution document No. 1982, page 7 of the English  
23 text, page 10 of the Japanese text, through the en-  
24 tire answer to the question, "Who agreed with this  
25 opinion?"



1 I am referring to the passage where it says  
2 that, among others, OSHIMA "and many others and their  
3 activities were concentrated in attacking the terri-  
4 tories of the USSR, China, and the Republic of Outer  
5 Mongolia, and they also urged the occupation of the  
6 South Sea Islands by Japanese forces" with Manchuria  
7 as a base.

8 In so far as OSHIMA is concerned, I object  
9 to the tendering of this document as evidence. My  
10 reasons are as follows:

11 THE PRESIDENT: I wish you would point out  
12 what particular part you are objecting to.

13 MR. GOLUNSKY: Perhaps we can save time if  
14 I say we agree to withdraw the whole question and  
15 the whole answer.

16 THE PRESIDENT: The objection is allowed.  
17 The affidavit of KISABA and the certificate  
18 of death are admitted on the usual terms.

19 CLERK OF THE COURT: Prosecution's document  
20 No. 1982 and the certificate of death attached there-  
21 to will be given exhibit No. 838.

22 (Whereupon, the documents above  
23 mentioned were marked prosecution's exhibit  
24 No. 838 and received in evidence.)

25 THE PRESIDENT: It is a lengthy affidavit.



1 It may be read on Monday. We will adjourn now until  
2 half past nine on Monday morning.

3 (Whereupon, at 1555, an adjourn-  
4 ment was taken until Monday, 21 October  
5 1946 at 0930."

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