

1	"Summary	"Date	"Source of Information	"Dispatched From
2				
3	"The strength on			
4	the BURMA-THAI-	"Mid-	"Chief	
5	LAND Border is	September	of	
6	approx. 50,000		Staff	
7	and at BURMA there		Report	
8	will be another			
9	2000 to 3000 from			
10	the Volunteer Army.			
11	"The increase in			
12	strength in MALAYA			
13	will be presumed as	"End	"Chief	
14	10,000 Australians.	of	of	
15	(Approximately 5,000	October	Staff	
16	Australians at SINGA-		Report	
17	PORE in Mid-August,			
18	and at the end of			
19	August, although there			
20	is no information on			
21	the number, transports			
22	carrying Australians			
23	had reached SINGAPORE).			
24	Heretofore, the regular			
25	army of 48,000 has			

"WEEKLY
REPORTS"

1 reached approximately
2 60,000. Moreover, if
3 we make a rough esti-
4 mate of the increase
5 in Hindu troops, (in-
6 crease not according
7 to confirmed intelli-
8 gence) it will not
9 exceed the estimate
10 of 71,000-75,000 by
11 the SINGAPORE Foreign
12 Affairs at the end of
13 August.

14 "b. Sketch Showing Allied Air Forces in
15 South West Pacific Area

16 "A sketch, issued by the Army Air Defense
17 Unit and labelled 'Air Defense Intelligence Report
18 No. 1', showing dispositions and strengths of Allied
19 Air Forces in South Sea Islands is reproduced as
20 Figure 3. The sketch is dated 6 December 1941 but
21 an annotation states that it was prepared 'before
22 the crisis.'"
23
24
25

1 I will read paragraphs 32 to 36, but only
2 the headings and occasionally a paragraph or two:

3 "32. JAPANESE INTELLIGENCE ESTIMATE OF
4 UNITED STATES FORCES IN THE PHILIPPINE ISLANDS
5 PRIOR TO THE OUTBREAK OF WAR

6 "a. UNITED STATES Strength--PHILIPPINE
7 ISLANDS

8 "A file of handwritten sheets, dated July--
9 December 1941, entitled 'No. 3 Situation of Both
10 Sides Prior to the Outbreak of War,' issuing author-
11 ity not specified, reads in part as follows:

12 "The strength of the American Garrison
13 Army in the PHILIPPINES was 12,000 (American about
14 5,500; native about 6,500). Because of the inter-
15 national situation, however, this number was increased
16 by about 5,200 Americans and 6,000 natives, so that
17 by July of this year, the total reached 22,000.
18 The Filipino National Guard and patrol scouts were
19 included under General MACARTHUR, the American Far
20 Eastern Army Commander who was to undertake the uni-
21 ted command of all troops in the PHILIPPINES."

22
23
24
25

I will go to paragraph 33:

"33. PRE-WAR ESPIONAGE AND SUBVERSIVE
ACTIVITY IN THE NETHERLANDS EAST INDIES

"a. Sketches Showing NETHERLANDS EAST
INDIES Defense Forces 1935-1940 (41)

"Three captured sketches, undated, issuing
authority not specified, showing disposition and
strength of NETHERLANDS EAST INDIES forces on the
islands of JAVA, SUMATRA and BALI are reproduced as
Figures 5, 6 and 7. Although the sketches are not
individually dated, one of them bears the note
'1935 to the present.' The present would seem from
internal evidence to refer to 1940 or 1941."

1 The Tribunal may wish to examine the maps
2 on pages 36, 37 and 38.

3 I will go to page 39, paragraph 34:

4 "34. PRE-WAR ESPIONAGE IN NEW GUINEA

5 "The following intelligence report on BRITISH
6 NEW GUINEA is based on the observations of Major
7 TOYOFUKU, Tetsuo, in March 1941. The experience
8 gained by this officer was subsequently utilized
9 through his appointment to the staff of the South
10 Seas Detachment, the force which later fought over
11 this same country. The preface and text of the
12 report read as follows:

13 "'Military Data on BRITISH NEW GUINEA

14 "'General Staff Headquarters

15 "'Reproduced by: General Headquarters,
16 Southern Army

17 "'Headquarters, Eastern Detachment,

18 "'1 October 1942

19 "'This data was compiled from the report of
20 an inspection by Major TOYOFUKU, Tetsuo, March 1941,
21 and from data obtained and arranged thereafter.

22 "'References perused for data are: 'Military
23 Report on British owned NEW GUINEA', published by
24 the Naval General Staff September 1940; Volume II
25 of 'NEW GUINEA Sailing Directory' published by

1 Hydrographic Department; Charts Nos. 854, 857, 859,
2 878, and other necessary maps.

3 "Part I - Military Value of BRITISH
4 NEW GUINEA and SOLOMON Islands:

5 "These possessions, together with the
6 DUTCH EAST INDIES Archipelago, form a natural
7 barrier intersecting the PACIFIC OCEAN from north
8 to south. The northern end is within the radius
9 of action of our bombers from most of our South
10 Sea Mandated Islands, and the southern end is within
11 the radius of action of bombers from the northern
12 part of AUSTRALIA. (It is approximately 1000 kilo-
13 meters from TRUK and PONAPE Islands, in our South
14 Sea Mandate, to RABAU, capital of the Australian
15 Mandated Territory; approximately 1250 kilometers
16 from COOKTOWN, NORTH AUSTRALIA, to RABAU, and
17 approximately 600 kilometers to PORT MORESBY.)
18 They are separated from the Australian Continent
19 by the narrow TORRES STRAIT. Consequently, posses-
20 sion of this territory would make it easy to obtain
21 the command of air and sea in the South West PACIFIC
22 and to acquire 'stepping stone' bases for operations
23 against AUSTRALIA. Control of the southern coast of
24 NEW GUINEA, in particular control of TORRES STRAIT,
25 would cut communications between the South PACIFIC

1 OCEAN and DUTCH EAST INDIES as well as the INDIAN
2 OCEAN Area; and would force the enemy fleet to
3 deſcend to the Southern coast of AUSTRALIA.

4 "As mentioned above, it is considered
5 that this is ſtrategically important territory for
6 Japanese Operations in the South Seas, eſpecially
7 againſt AUSTRALIA. Moreover, Japanese forces ſhould
8 conſider it very fortunate that the places uſed as
9 baſes for air and ſea forces in this territory are
10 not few."

1 I will turn to page 42, paragraph 35:

2 "35. Pre-War Espionage in Australia

3 "a. Sketch Showing Disposition of Australian
4 Troops.

5 "An annotated sketch showing the disposition
6 of Australian military forces as of July 1940 is re-
7 produced as Figure 8. The sketch appears to have
8 been issued by OSAMU (16 Army) Group Headquarters."

9 The Tribunal may wish to examine the sketch
10 on page 43.

11 Page 44:

12 "Table issued by OSAMU (16 Army) Group
13 Headquarters, dated July 1940, and setting forth the
14 organization of the Australian Army, reads as fol-
15 lows:"

16 The Tribunal may wish to examine the table
17 on page 44, page 45, page 46 and page 47.

18 THE PRESIDENT: Yes, Mr. English.

19 MR. ENGLISH: I will turn to page 47, para-
20 graph 36:

21 "SECURITY MEASURES IN KOREA

22 "Prior to 8 December 1941 precautions
23 against the leakage of information were detailed
24 and thorough. An official document dated September
25 1941 shows that 19 Division in KOREA took most

1 elaborate precautions to prevent any news of military
2 value from being obtained by nationals of other
3 countries.

4 "Extracts from Counter-Espionage Regula-
5 tions drafted 30 September 1941, held by 47 Field
6 Antiaircraft Artillery Battalion based 19 Division
7 Staff Report.

8 "Measures to be taken while awaiting
9 orders.

10 "No. 1 Policy.

11 "Periodical and progressive reform in-
12 struction will be given concerning counter-
13 espionage and various regulations. Do not permit
14 natives of enemy territory to participate in our
15 schemes for obtaining intelligence of any kind.
16 At the same time the arousing of a positive con-
17 sciousness in officers and men (employees included)
18 so they can act in themselves to nullify and com-
19 pletely crush the various plans and strategies
20 of the enemy. Thus, by hoodwinking the enemy
21 and hiding our own plans we will have nothing to
22 fear in putting our military preparations into
23 operation.

24 "Paragraph 21. - Restrict the contact
25 of military personnel with foreigners especially

1 those outside barracks, to that of official business.
2 (Particularly in regard to language study and religion).

3 "Precautions will particularly be taken
4 with Englishmen, Americans, Russians and anti-
5 'Hitlerites', of whom there are a large number,
6 even though they are Germans, to avoid malicious
7 behaviour or prevent discovery of our intentions.

8 "Control the association of Korean
9 Christians with Englishmen and Americans.

10 "Paragraph 22. - Watch the conversation
11 of the families of soldiers, especially children,
12 and restrict their acquisition of matters that
13 concern the army.

14 "Acting in concert with the provincial
15 authorities particularly the school authorities,
16 keep control over wild rumours and false reports
17 from students (T.N. school children) and make an
18 attempt to guide them in such matters.

19 "Each household will report domicile,
20 etc. of all Koreans employed by the commander of
21 the unit to which it is associated.

22 "Be strict in supervision and investigation
23 of merchants, especially Koreans entering and
24 leaving the compound of the official residence.

25 "Paragraph 38.-Enforce directions con-

cerning prevention of espionage when having dealings with gendarmes and with government and private schools of each province in KOREA. Also with post offices, journalists, etc.

"Paragraph 54 -Develop in soldiers the faculty of preventing espionage and let them develop their own resourcefulness. It is expected that they will be on special guard when in contact with Koreans, etc. (For example, Koreans examining the contents of soldiers' wastepaper baskets.)"

"SECTION IV. PUBLICATIONS OF MILITARY SIGNIFICANCE

"37. GENERAL

"A survey of captured documents indicates that a considerable number of training manuals, instructions, etc., bearing directly on subsequent military operations were published during the year and a half preceding the outbreak of war. Normal military programs may well account for the greater part of these publications. In many instances, however, their subject matter serves to document the trend of Japanese military interest, while in a few cases official statements prefaced to publications are clearly indicative of the approaching

1 crisis. A list of pertinent publications chrono-
2 logically arrayed according to date of issue, is
3 set forth in the following paragraph.

4 "38. LIST OF PUBLICATIONS

5 "Military Geography of NETHERLANDS EAST
6 INDIES

7 "List of military secret documents received,
8 belonging to 41 Infantry Regiment, dated 9 July
9 1942, contains the following items:

10 "Date of Preparation	Subject
11 "'30 April 1940	BRITISH MALAYA: 12 Military Geography and 13 General Description.
14 "'1 November 1940	DUTCH EAST INDIES: Military 15 Geography.
16 "'1 November 1940	DUTCH EAST INDIES: Military 17 Geography. (Separate volume)
18 "'30 August 1941	BRITISH BORNEO: Military 19 Geography and General 20 Description.
21 "'15 October 1941	The Resources 22 BRITISH MALAYA."
23	
24	
25	

1 I will read only the paragraphs which I
2 indicate:

3 "d. Rapid Training of Air Service
4 Personnel.

5 "Index list of military secret documents
6 taken over by Confidential Books Officer of 41
7 Infantry Regiment on 10 October 1942. Prepared by
8 War Ministry:

9 "Date or Preparation	Subject
10 April 10, 1941	On the rapid training
	11 of men for air service.

12 "e. Future Treasure of JAPAN.

13 "Colored map entitled 'Great East ASIA and
14 PACIFIC,' issued by Cabinet Printing Department on
15 30 April 1941. Pencilled near NEW GUINEA is the com-
16 ment -- 'Future treasure of JAPAN, Population
17 300,000.'"

18 I will turn to page 50, paragraph (i):

19 "i. Map of Military Installations -
20 SINGAPORE.

21 "Colored map entitled, 'East Asia Co-Prosp-
22 perity Sphere, Large Map of Western PACIFIC OCEAN,'
23 published in September 1941, issuing authority not
24 specified. Insets include: Map of world, sketch map
25 of military installations of SINGAPORE, detailed map

of JAVA, and detailed map of the HAWAIIAN Islands.

"k. Manual of Landing Operations.

"Reference Manual on Landing Operations, compiled by Inspector General of Military Education, dated 18 September 1941. Introduction contains the following passage:

" 'This book was distributed without delay in order to furnish materials for reference on landing operations. '

"n. Identification of Allied Planes.

"Printed Handbook entitled 'Identification of Soviet, American and British planes, 'published in September 1941 by Inspectorate General of Military Education. '

"p. Japanese-Malayan Vocabulary.

"Printed pamphlet containing Japanese-Malayan vocabulary dated October 1941 issued by Naval General Staff.

"q. Tropical Hygiene Handbook.

"Printed Manual entitled 'Tropical Hygiene Handbook' edited by Medical Bureau, Navy Department, published by Bureau of Education, Navy Department, dated October 10, 1941. '"

1 I direct the Tribunal's attention to
2 Appendix A, which is a chart of the matter contained
3 in the pages preceding it. The chart begins on page
4 52 and ends on page 65.

1 MR. LOGAN: If the Tribunal please, --

2 THE PRESIDENT: Mr. Logan.

3 MR. LOGAN: (Continuing) in the first page
4 of this document it appears that this report was
5 solely based on documentary evidence held at ATIS,
6 GHQ prior to 1 January 1945. The defense would like
7 to know if these documents are still held by ATIS or
8 by the Prosecution staff; and, if so, we would like
9 to have the opportunity of examining them both be-
10 cause of translation matters and to examine portions
11 which were omitted in the report.

12 THE PRESIDENT: Mr. English.

13 MR. ENGLISH: Your Honor, the Prosecution
14 Section has not in its possession any of these docu-
15 ments, nor has the Allied Translator and Interpreter
16 Section of GHQ the documents here in Tokyo.

17 THE PRESIDENT: Do you suggest that the
18 defense might be allowed to peruse the material from
19 which this report has been made up if that opportunity
20 presents itself? It does seem to be in the inter-
21 ests of a fair trial that they should have that
22 opportunity.

23 MR. ENGLISH: Yes, your Honor.

24 THE PRESIDENT: I feel that all my col-
25 leagues agree with that.

1 MR. ENGLISH: In fact, your Honor, the
2 Prosecution Section made serious efforts to obtain
3 these documents but was unable to get them.

4 THE PRESIDENT: Was any reason given to
5 you?

6 MR. ENGLISH: I have a communication here,
7 your Honor.

8 THE PRESIDENT: I will deal with the matter
9 in Chambers on an application by the defense.

10 MR. ENGLISH: That would be the proper
11 place, your Honor.

12 THE PRESIDENT: What was that?

13 MR. ENGLISH: I submit that that might be
14 the proper place to deal with this matter, in
15 Chambers.

16 THE PRESIDENT: It is unless you have some
17 material there that indicates that an application
18 would be useless.
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1 MR. ENGLISH: I have a communication from
2 ATIS addressed to the Chief of the Investigation
3 Division of IPS, which reads as follows:

4 "Regarding your request for the original
5 documents used as a base for compilation of ATIS
6 Report No. 131 entitled, 'Japan's Decision to Fight,'
7 I hereby inform you that they were shipped from
8 Brisbane, Australia, and Manila, Philippine Islands,
9 to the Washington Document Center, Washington, D.C.
10 during the period May, 1945, to October, 1945."

11 THE PRESIDENT: They are in Washington,
12 that is the answer.

13 MR. ENGLISH: That is the answer, your Honor.

14 THE PRESIDENT: Do you see any reason why
15 I should not make an order -- why the Tribunal should
16 not make one -- for their production here?

17 MR. ENGLISH: A member of the prosecution
18 staff went to Washington to try to get the documents
19 but was unable to do so. However, there is no reason
20 why such an order should not be made, your Honor.

21 THE PRESIDENT: Photostat copies will do.

22 The prosecution not objecting, we make an
23 order for the production of the originals or photo-
24 stat copies.
25

MR. ENGLISH: Will the Clerk mark for

1 identification prosecution's document No. 1555,
2 entitled "Tokyo Gazette," Volume V, No. 8, February,
3 1942?

4 Reference is made to court exhibit No. 448,
5 page 5102 of the record being three certificates
6 showing the source of the "Tokyo Gazette" as having
7 come from the Japanese Institution of Foreign Affairs
8 and certifying that these magazines were issued under
9 governmental supervision.

10 I offer in evidence prosecution's document
11 No. 1555-I, an excerpt from prosecution's document
12 No. 1555, in the form of a Ministerial Address of
13 the accused TOJO to the 78th Session of the Imperial
14 Diet, December 16, 1941.

15 THE PRESIDENT: Admitted on the usual terms.

16 CLERK OF THE COURT: Prosecution's document
17 No. 1555 will receive exhibit No. 879 for identifica-
18 tion only. Prosecution's document No. 1555-I will
19 receive exhibit No. 879-A.

20 (Whereupon, prosecution's document
21 No. 1555 was marked prosecution's exhibit
22 No. 879 for identification; and prosecution's
23 document No. 1555-I was marked prosecution's
24 exhibit No. 879-A and was received in evidence.)
25

MR. ENGLISH: I will read the last paragraph

of page 2:

"We owe the officers and men of the Army and Navy debts of heartfelt gratitude and unbounded admiration for the demonstration of their great prowess. For years they have been silently going through hard training in preparation for this day. Once war starts, they go to the front, with no thought of returning alive, for the cause of the State."

I offer in evidence prosecution's document No. 2521, which is a chart prepared by the First Demobilization Bureau of the Japanese Government showing the total strength of the Japanese Army from January 1, 1930, to January 1, 1944.

THE PRESIDENT: Admitted on the usual terms.

CLERK OF THE COURT: Prosecution's document No. 2521 will receive exhibit No. 880.

(Whereupon, the document above referred to was marked prosecution's exhibit No. 880 and was received in evidence.)

MR. ENGLISH: I will read the chart:

"The Total Strength of the Japanese Army.

<u>"Period</u>	<u>Division</u>	<u>Brigade</u>	<u>Total Strength</u>
1 Jan. 1930	17	4	250,000
" " 1931	17	4	250,000"

1 THE PRESIDENT: Read where the big changes
2 take place.

3 MR. ENGLISH: (Continuing)

4	"1 Jan. 1938	26	5	950,000
5	" " 1939	35	15	1,130,000
6	" " 1940	43	16	1,240,000
7	" " 1941	53	24	1,350,000

8 * * *

9	" " 1943	68	25	2,400,000
10	" " 1944	80	41	2,900,000"--

11 THE PRESIDENT: 1942 is worth reading.

12 MR. ENGLISH: (Continuing)

13 "The number of division shows the total of
14 infantry divisions, tank divisions, flying division
15 groups, flying divisions and flying training divisions."--

16 THE PRESIDENT: For 1942 the figures are:
17 "56, 25, 2,100,000."

18 MR. ENGLISH: 2,100,000 men; 56 -- 25
19 brigades -- 2,100,000 men. (Continuing):

20 "The number of brigades shows the total of
21 independent mixed brigades, independent infantry
22 brigades, cavalry brigades, artillery brigades, inde-
23 pendent tank corps, task brigades on sea and the
24 Karafuto Mixed Brigade.

25 "'Total Strength' shows the permanent

1 establishment, so the number is roughly estimated.

2 "The necessary materials to the estimation
3 of the above numbers were lost on account of burning
4 up and so on at the termination of the war. So, this
5 is the best record that the 1st Demobilization
6 Bureau can offer at present (July 16, 1946) through
7 various remaining records (and a part of them was
8 collected from memories)."

9 This concludes this phase of the case.
10 Brigadier Quilliam will now introduce evidence of
11 the illegal fortification of Japan's mandated islands.

12 THE PRESIDENT: Brigadier Quilliam.

13 BRIGADIER QUILLIAM: Mr. President and
14 Members of the Tribunal, it is now proposed to present
15 evidence which it is submitted will show that from the
16 year 1932 onwards Japan, in violation of treaties
17 and with a view to future wars of aggression, fortified
18 and established military and naval bases in the islands
19 in the Pacific held by her under mandate from the
20 League of Nations.

21
22 The counts of the Indictment to which this
23 evidence relates are all those in Group One, namely,
24 counts 1 to 36, inclusive, and the sections of the
25 Appendices affected are Section 5 (c) of Appendix A
and Clauses 15, 18 and 31 of Appendix B.

1 In order to show the situation of the
2 Japanese mandated islands I offer in evidence IPS
3 document No. 1756-H, being an excerpt from "The
4 Japan Year Book 1941-42." This book has been already
5 produced in evidence and is court exhibit No. 276.

6 THE PRESIDENT: This excerpt is admitted on
7 the usual terms.

8 CLERK OF THE COURT: Prosecution's document
9 No. 1756-H will receive exhibit No. 881.

10 (Whereupon, the document above
11 referred to was marked prosecution's exhibit
12 No. 881 and was received in evidence.)

13 BRIGADIER QUILLIAM: I will now read the
14 excerpt which is taken from page 909 of the book:

15 "South Sea Islands under Japan's Mandate.
16 Geographical Features.

17 "The South Sea Islands mandated to Japan,
18 numbering over 1,400, with an aggregate area of
19 2,148.80 square kilometers, are the Mariana, Marshall
20 and Caroline groups, between 131°10' and 172°10' of
21 east longitude and between 1°15' and 20°32' of north
22 latitude. The Hawaiian Islands are to the east; the
23 Philippines and Celebes to the west; the Bonin
24 Islands to the north, and New Guinea to the south.
25 Only one island among them, i.e. Guam, belongs to the

1 United States.

2 "The Mariana archipelago starts close to
3 the southern end of the Bonin Islands, stretching
4 toward the equator, and the Marshall and Caroline
5 groups extend to the east and west along the equator,
6 forming an inverted letter 'T' with the Marianas.

7 About 740 miles south of the Bonin Islands lies
8 Saipan, the largest of the Marianas, and about 180
9 miles farther south is Truk, one of the largest of
10 the Carolines, which marking the crossing point of
11 the inverted 'T', is the center of the mandated
12 territory. The line of 148° east longitude divides
13 the Carolines into the West Carolines, with Palau
14 and Yap, and the East Carolines, with Truk and Ponape.
15 Because of the distances between the islands and the
16 extensive area covered by them, communications are
17 difficult. The fact that each group of isles uses
18 different words peculiar to itself sufficiently dem-
19 onstrates the degree to which they are separated."
20

21 Mr. President, I have here copies of a map
22 prepared and issued by the American Army Map Service.
23 The map shows the mandated islands of Japan and their
24 situation with respect to other countries. I have
25 been able to obtain a copy for each Member of the
Tribunal and also four copies for the defense. It

1 has not been reproduced or translated in accordance
2 with the Tribunal's rules, and I am therefore unable
3 to offer it in evidence. I respectfully suggest,
4 however, that it would be helpful to the Members of
5 the Tribunal to be able to refer to the map and that
6 no prejudice would be caused the defense. I under-
7 stand that the defense has no objection to this
8 course. If the Members of the Tribunal wish to have
9 the maps for reference they can be handed to the
10 Clerk now.

11 THE PRESIDENT: There being no objection
12 by the defense, tender the map. You tender it,
13 Brigadier, and it is admitted on the usual terms.

14 BRIGADIER QUILLIAM: I tender the map in
15 evidence, if it please the Tribunal, now.

16 CLERK OF THE COURT: These maps, without
17 prosecution's identifying number, will be given
18 exhibit No. 882.

19 (Whereupon, the map above referred
20 to was marked prosecution's exhibit No. 882
21 and received in evidence.)

22 MR. LEVIN: Mr. President.

23 THE PRESIDENT: Mr. Levin.

24 MR. LEVIN: On behalf of the defense may I
25 state that we have heretofore advised Brigadier

1 Quilliam that there would be no objection with
2 reference to pursuing this course.
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1 THE PRESIDENT: Brigadier Quilliam.

2 BRIGADIER QUILLIAM: May it please the
3 Tribunal, in order to explain the history of Japan's
4 Mandate, it is necessary to refer to Article 22 of
5 the Covenant of the League of Nations, to the terms
6 of the Mandate, and to the Treaty in respect of the
7 Mandate made between the United States and Japan.
8 The Covenant of the League of Nations has been
9 already produced in evidence as Court exhibit No.

10 23. Article 22 of the Covenant is as follows:

11 "To those colonies and territories which
12 as a consequence of the late war have ceased to
13 be under the sovereignty of the States which formerly
14 governed them and which are inhabited by peoples
15 not yet able to stand by themselves under the
16 strenuous conditions of the modern world, there should
17 be applied the principle that the well-being and
18 development of such peoples form a sacred trust of
19 civilization and that securities for the performance
20 of this trust should be embodied in this covenant.

21 "The best method of giving practical effect
22 to this principle is that the tutelage of such peoples
23 should be entrusted to advanced nations who by reason
24 of their resources, their experience or their geo-
25 graphical position can best undertake this responsibility,

1 and who are willing to accept it, and that this
2 tutelage should be exercised by them as Mandatories
3 on behalf of the League.

4 "The character of the mandate must differ
5 according to the stage of the development of the
6 people, the geographical situation of the territory,
7 its economic conditions and other similar circumstances.

8 "Certain communities formerly belonging to
9 the Turkish Empire have reached a stage of development
10 where their existence as independent nations can be
11 provisionally recognised subject to the rendering
12 of administrative advice and assistance by a Mandatory
13 until such time as they are able to stand alone.
14 The wishes of these communities must be a principal
15 consideration in the selection of the Mandatory.

16 "Other peoples, especially those of Central
17 Africa, are at such a stage that the Mandatory must
18 be responsible for the administration of the territory
19 under conditions which will guarantee freedom of
20 conscience and religion, subject only to the maintenance
21 of public order and morals, the prohibition of abuses
22 such as the slave trade, the arms traffic and the
23 liquor traffic, and the prevention of the estab-
24 lishment of fortifications or military and naval bases
25 and of military training of the natives for other than

1 police purposes and the defence of territory, and
2 will also secure equal opportunities for the trade
3 and commerce of other Members of the League.

4 "There are territories, such as South-West
5 Africa and certain of the South Pacific Islands,
6 which, owing to the sparseness of their population,
7 or their small size, or their remoteness from the
8 centres of civilization, or their geographical
9 contiguity to the territory of the mandatory, and
10 other circumstances, can be best administered under
11 the laws of the Mandatory as integral portions of
12 its territory, subject to the safeguards above mentioned
13 in the interests of the indigenous population.

14 "In every case of mandate, the Mandatory
15 shall render to the Council an annual report in
16 reference to the territory committed to its charge.

17 "The degree of authority, control, or adminis-
18 tration to be exercised by the Mandatory shall, if
19 not previously agreed upon by the members of the
20 League, be explicitly defined in each case by the
21 Council.

22 "A permanent Commission shall be constituted
23 to receive and examine the annual reports of the
24 Mandatories and to advise the Council on all matters
25 relating to the observance of the mandates."

1 In accordance with the provisions of Article
2 22 of the Covenant Japan was, on the 17th December
3 1920, granted a mandate to administer the groups
4 of Islands mentioned. The provisions of the Mandate
5 are set out in full in the Treaty made on the 11th
6 February 1922 between the United States and Japan
7 which has been produced in evidence as Court exhibit
8 No. 29. It is not proposed unless the Tribunal directs
9 otherwise to prove the Mandate as a separate document.

10 It is, I apprehend, unnecessary to refer
11 to all the provisions of the Mandate and I will read
12 only Article 4, which is as follows:

13 "The Military training of the natives,
14 otherwise than for purposes of internal police and
15 the local defence of the territory, shall be prohibited.
16 Furthermore no military or naval bases shall be
17 established or fortifications erected in the territory."

18 I will now read short extracts from the
19 Treaty made on the 11th February 1922 between the
20 United States and Japan (Court exhibit No. 29) under
21 which the United States consented to the administration
22 of the Islands by Japan.

23 "Article 1. - Subject to the provisions
24 of the present Convention, the United States consents
25 to the administration by Japan, pursuant to the

1 aforesaid Mandate, of all the former German Islands
2 in the Pacific Ocean, lying north of the Equator.

3 "Article II(first paragraph) - The United
4 States and its nationals shall receive all the benefits
5 of the engagements of Japan, defined in Articles
6 3,4 and 5 of the aforesaid Mandate, notwithstanding
7 the fact that the United States is not a Member of
8 the League of Nations."

9 I wish now to refer to the assurance given
10 by the Japanese Ambassador to the Secretary of
11 State on the execution of the Treaty which has just
12 been mentioned, with respect to the extension of the
13 usual comity to nationals and vessels of the United
14 States in visiting the Islands. The assurance is
15 printed as an addendum to the Treaty on page 5
16 of Court exhibit No. 29 and (excluding formal parts)
17 is as follows:

18 "Japanese Embassy,

19 "Washington,

20 "February 11, 1922.

21 "In proceeding this day to the signature
22 of the Convention between Japan and the United
23 States with respect to the islands, under Japan's
24 Mandate, situated in the Pacific Ocean and lying
25 north of the Equator, I have the honour to assure

1 you, under authorization of my Government, that the
2 usual comity will be extended to nationals and vessels
3 of the United States in visiting the harbors and
4 waters of those islands."

5 It is now proposed to produce twenty-five
6 documents being the original depositions of 25 residents
7 of the Mandated Islands. As each original deposition
8 is produced it is proposed to read an excerpt or
9 excerpts from the deposition. By an Order made by
10 the Tribunal on the 5th July (Paper No. 275) compliance
11 with Rule 6(b)(1) of the Tribunal's Rules of Procedure
12 was dispensed with on certain terms. It should be
13 mentioned that we have gone further than the require-
14 ments of the Tribunal's Order and have served the
15 defendants with full English copies of the depositions.
16 The prosecution, however, rely only on those parts
17 of the depositions which will be read to the Tribunal
18 and which are marked on the originals and English
19 copies. The full depositions have not been translated
20 into Japanese, only the excerpts. It is submitted that
21 these excerpts will prove that for several years
22 prior to December 1941 Japan made fortifications and
23 military and naval bases in her Mandated Islands.

24 The first eleven depositions are made by
25 residents of islands in the Marianas Group.

1 I offer in evidence IPS Document No. 6022,
2 being the deposition of Manuel Blanco.

3 THE PRESIDENT: Mr. Logan.

4 IR. LOGAN: If the Tribunal please, these
5 documents to which Brigadier Quilliam just referred
6 are apparently made by various natives of various
7 islands. We have no desire to make any unreasonable
8 requests on either the Tribunal or the prosecution,
9 but if the prosecution is depending on these affidavits
10 to establish that these mandated islands were fortified
11 and that the fortifications began on certain dates,
12 which they intend to establish through these affidavits,
13 we believe that if they are solely depending on this
14 testimony, without any other evidence whatsoever, that
15 we should be given the opportunity to cross-examine
16 these witnesses.

17
18 THE PRESIDENT: We will recess now until
19 half past one.

20 (Whereupon, at 1200, a recess was taken.)
21
22
23
24
25

AFTERNOON SESSION

The Tribunal met, pursuant to recess, at 1330.

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

MR. SOMIYA: I am SOMIYA, Shinji, counsel for the defendant OKA, Takazumi.

THE PRESIDENT: Mr. SOMIYA.

MR. SOMIYA: I wish to speak on the document recently presented by the prosecution concerning the affidavit of an inhabitant of the South Seas. The inhabitants of the South Seas are of a very low cultural level, and there are those among them who can neither count nor even know their own ages. On looking over the affidavits I find that some of them -- that many of them -- that in many of them there is a confusion between the years preceding the war and those after the war began.

THE MONITOR: The facts preceding the war and after.

MR. SOMIYA: (Continuing) Therefore, I earnestly hope that we will be permitted to cross-examine these witnesses before this Tribunal. Mr. Logan has already asked for the appearance of the affiant as witness in this case, and I, myself, want on my part to

1 add my appeal to that of Mr. Logan. It is true that one
2 of the affiants is a Japanese. I have heard that this
3 Japanese has recently been repatriated. I say that
4 by the way. Thank you.

5 THE PRESIDENT: Brigadier Quilliam.

6 BRIGADIER QUILLIAM: May it please the
7 Tribunal, in the first instance; I feel that I can
8 properly give an assurance to the Tribunal and to my
9 learned friend, Mr. Logan, that in addition to the
10 depositions, material, cogent evidence will be produced.

11 As regards the competency of these deponents,
12 may I suggest the Tribunal should later on make any
13 order that might be considered necessary in the circum-
14 stances.

15 MR. LOGAN: In view of counsel's statement,
16 may it please the Tribunal, we would like to suggest
17 these affidavits be received at this time conditionally
18 subject to the other proof the Brigadier mentioned.

19 THE PRESIDENT: Well, Mr. Logan's application
20 is based on the absence of other evidence besides the
21 affidavits. We must hear the other evidence that you
22 say you have, Brigadier, before we come to a decision.

23 We admit the document on the usual terms.

24 CLERK OF THE COURT: Prosecution's document
25 No. 6022 will receive exhibit No. 883.

1 (Whereupon, the above-mentioned docu-
2 ment was marked prosecution's exhibit No.
3 883 and received in evidence.)

4 BRIGADIER QUILLIAM: I will now read an
5 excerpt from the deposition. It is dated 16 March 1946.

6 (Reading): "I, Manuel Blanco, was born on
7 Saipan on 13 November 1906. I worked for the N.K.K.
8 as a blacksmith from 1934 to 1944. During this
9 period the Japanese Navy's most important military
10 construction projects were the buildings of ASLITO
11 Naval Air Base commenced in 1932 and it was never
12 completed. At the beginning of 1940 anti-aircraft,
13 coastal batteries, and other type of ordnance were
14 installed at the ASLITO Air field. I saw at that time
15 the NKK train bring plane parts and guns, bombs, etc.,
16 from the pier to the Aslito Naval Air Base. I helped
17 to build a bomb shelter at Aslito Field in 1938. The
18 hangars as well as other installations were camouflaged
19 with grass, trees, and plants beginning in the later
20 part of 1938."

21 I offer in evidence I.P.S. Document No. 6024,
22 being the deposition of Wakamatsu Makoto.

23 THE PRESIDENT: Admitted on the usual terms.

24 CLERK OF THE COURT: Prosecution's document
25 No. 6024 will receive exhibit No. 884.

1 (Whereupon, the above-mentioned docu-
2 ment was marked prosecution's exhibit No. 884
3 and received in evidence.)

4 BRIGADIER QUILLIAM: I will read an excerpt
5 from the deposition. It is dated March 16, 1946.

6 (Reading): "I, Nakamatsu Makoto, was born at
7 Oita Ken, Kyushu, Japan, on 13 June 1907. I first
8 came to Saipan in 1935 to work as a Chemical engineer
9 for the N. K. K. I observed various military installa-
10 tions in the vicinity of the Aslito field on which
11 construction was commenced in 1933. Two years before
12 the outbreak of the war, the Japanese military built
13 a series of concrete trenches and shelters around the
14 Aslito Air Field, which were designated to serve as
15 means of protection in case of air raids. In 1940, I
16 happened to see some Japanese Navy Men storing a huge
17 amount of ammunition in some warehouses in Aslito Air
18 Field. These warehouses were situated in a forested
19 section and were camouflaged to look like trees. They
20 were coastal guns located on AGINGAN Point and NAFUTAN
21 Point. I heard after from NKK officials that there
22 was an anti-submarine net in Tanapag Harbor placed
23 there just before December 1941."
24
25

1 BRIGADIER QUILLIAM: I now offer in evidence
2 I.P.S. Document No. 6019, being the deposition of
3 Ignacio Benavente.

4 THE PRESIDENT: Admitted on the usual terms.

5 CLERK OF THE COURT: Prosecution's document
6 No. 6019 will receive exhibit No. 885.

7 (Whereupon, the above-mentioned docu-
8 ment was marked prosecution's exhibit No. 885
9 and received in evidence.)

10 BRIGADIER QUILLIAM: I will read an excerpt
11 from this deposition.

12 (Reading): "Date: March 16, 1946.

13 "I, Ignacio Benavente, Farmer and Village
14 Chief Assistant,

15 "As far as I can remember the ASLITO Airfield
16 was built in 1935. I saw a wireless station and
17 gasoline tanks at the same airfield before I left
18 for Yap in 1937 and another military wireless station
19 north of Susupo, site of present Signal Supply. I
20 heard at that time that an ammunition dump was being
21 built and also a large tank in 1935 near the harbor."

22 I offer in evidence I.P.S. document No. 6020
23 being the deposition of Elias P. Sablan.

24 THE PRESIDENT: Admitted on the usual terms.

25 CLERK OF THE COURT: Prosecution's document

No. 6020 will receive exhibit No. 886.

(Whereupon, the above-mentioned document was marked prosecution's exhibit No. 886 and received in evidence.)

BRIGADIER QUILLIAM: I will read an excerpt from this deposition.

(Reading): "Date March 16, 1946.

"I, Elias Sablan, was born on the 8 of November 1899, on Saipan, M. I. I worked as foreman loading and unloading cargoes. This work was carried on at Tanapag harbor in 1931. Aslito Field in 1935 was started. In 1939 Banadero construction began. The Japanese brought in about 10-inch guns stored them in warehouses. This occurred around 1937. They were set up in 1939 and 1940. The forced labor started in 1939 and they took Saipan Chamorros up to a reef to fortify it. Keeping forced labor there for 6 months. These people were paid two yens a day. Early 1931 --"

I think, your Honor, that is plainly "1941", although that is how it appears in the original.

(Reading continued): "Early 1931 the Japs started bringing in cement, lumber, many airplanes. In the summer of 1941, they started to bring in fighters, bombers, and many drums of gas. Forced labor used to help to fortify Saipan was used by the Japanese.

1 "About 18 November 1941 ten young Chamorros
2 21-25 who could speak English were picked forcibly and
3 another group one which later were told they were to
4 help the Emperor and Japan. On 6 December they were
5 sent to Guam on unknown mission. Second group was
6 sent to Guam on 8 December 1941. They were used to
7 search the island for gun positions to help the
8 Japanese but after being turned loose to watch they
9 hid in the jungles."

10 I offer in evidence I.P.S. document No. 6023,
11 being the deposition of Mariano Pangelinan.

12 THE PRESIDENT: Admitted on the usual terms.

13 CLERK OF THE COURT: Prosecution's document
14 No. 6023 will receive exhibit No. 887.

15 (Whereupon, the above-mentioned document
16 was marked prosecution's exhibit No. 887 and
17 received in evidence.)

18 BRIGADIER QUILLIAM: I will now read an
19 excerpt from the deposition.

20 (Reading): "Date: 16 March 1946.

21 "I, Mariano Pangelinan, was born on November
22 1880 in Guam and came to Saipan in 1901. From 1903
23 to 1945 I served as district chief of District #2.
24 Under the Japanese I was a labor foreman."

25 "The Japanese were very careful to hide from

1 the native population all military installations and
2 fortifications, but I saw many signs of Japanese rearmament in Saipan before 1941. This rearmament started
3 gradually around 1935 with the building of the Aslito
4 air field on the present site of Isley Field and made
5 rapid headway by 1940. I noticed during this period
6 the construction of ammunition dumps, military barracks, and other military installations."

9 I offer in evidence I.P.S. document No. 6025,
10 being the deposition of Antonio Angailen.

11 THE PRESIDENT: Admitted on the usual terms.

12 CLERK OF THE COURT: Prosecution's document
13 No. 6025 will receive exhibit No. 888.

14 (Whereupon, the above-mentioned document was marked prosecution's exhibit No. 888
15 and received in evidence.)

17 BRIGADIER GUILLIAM: I will now read an
18 excerpt from the deposition.

19 (Reading): "Date: 16 March 1946.

20 "I was born on Saipan 24 November 1889. I
21 was elected District Chief of Carolinans in 1912 while
22 under the rule of the Germans. At present I hold the
23 same job. The Japanese ordered me to retain the same
24 position. In 1935 a Naval Air Base at Tanapag was
25 started. In 1937 Aslito (Isley) air field was built.

1 In 1940 Japanese emplacements were put up."

2 I offer in evidence I.P.S. document No. 6026,
3 being the deposition of Juan M. Ada.

4 THE PRESIDENT: Admitted on the usual terms.

5 CLERK OF THE COURT: Prosecution's document
6 No. 6026 will receive exhibit No. 889.

7 (Whereupon, the above-mentioned docu-
8 ment was marked prosecution's exhibit No. 889
9 and received in evidence.)

10 BRIGADIER QUILLIAM: I will now read an
11 excerpt from the deposition.

12 (Reading): "Date: 16 March 1946.

13 "I was born in Guam on October 24, 1886, and
14 came to Saipan in 1890. In 1937 I was elected Head
15 Chief of Garapan Village. In administering the
16 village I was forced to take orders from the Japanese.
17 In 1935 the Japanese bought up the farms in the area
18 of Tanapag Village and immediately started building a
19 Naval Air Base."

20 I offer in evidence I.P.S. document No. 6021,
21 being the deposition of Concepcion Blanco.

22 THE PRESIDENT: Admitted on the usual terms.

23 CLERK OF THE COURT: Prosecution's document
24 No. 6021 will receive exhibit No. 890.

25 (Whereupon, the above-mentioned document

1 was marked prosecution's exhibit No. 890
2 and received in evidence.)

3 BRIGADIER QUILLIAM: I will now read an excerpt
4 from the deposition.

5 (Reading): "16 March 1946.

6 "I, Concepcion Blanco, age 27, was born on
7 Saipan on 13 December 1918. I worked as a clerk and
8 telephone operator in the Japanese Naval Construction
9 department at Tanapag Harbor, Saipan from 1938 to 1944.
10 In this capacity I had the opportunity to observe the
11 construction of Japanese military fortifications and
12 installations before December 1941. Six underground
13 tanks were constructed in 1937. I saw fuel installa-
14 tions at the seaplane base. There were five barracks
15 housing about 3000 military and naval personnel. The
16 construction of these began in 1938. There were two
17 radio stations constructed in 1938. There were five
18 signal stations operated by Kasuga butai at Garapan,
19 Shibata butai at Garapan, Nafuten, Agranhan, Tanapag,
20 Magacienne Bay. A Navy Rear Admiral was in charge of
21 all these signal stations."
22
23
24
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1 BRIGADIER QUILLIAM (Continuing): I offer in
2 evidence I.P.S. document No. 6017, being the deposition
3 of Vincente de Leon Guerrero.

4 THE PRESIDENT: Admitted on the usual terms.

5 CLERK OF THE COURT: Prosecution's document
6 No. 6017 will receive exhibit No. 891.

7 (Whereupon, the above-mentioned document
8 was marked prosecution's exhibit No. 891 and
9 received in evidence.)

10 BRIGADIER QUILLIAM: I will read an excerpt.

11 (Reading): "Date: 15 March 1946.

12 "I was born on the 9th October 1898 in
13 Garapan, Saipan. Since the age of 7 I entered the
14 Public German School up to the age of 16, when I was
15 graduated in April 1913. On December 1913, I was
16 sended to Yap to the German Dutch Cable and Co. to work
17 at the station as a operator.

18 "I was turned back to Saipan in February
19 1915. Since then I work at my father's farm in
20 helping my father supporting us, up to the time when
21 I got married at the age of 25. My job is still a
22 farmer, when in 1937 I was choosed as a foreman by
23 order of the Chamorran Administration, to go with a
24 party of 30 natives to work at the underground tanks
25 installations at Tanapag Harbor for 3 months. There

1 were 6 underground tanks (4 big ones and 2 small).
2 Each tank of the big size are approximately 1800
3 Feet round. We are informed by the authority that
4 we Chamorros to have to carry some jobs; because a
5 war might happen in the very near future, and these
6 installations must be done before too late, those
7 tanks when completed are to be filled with oil and
8 gasoline, for the ships that have to come in Saipan.
9 We are informed to keep the words very secret. Any-
10 body who tells such things must be punished by the
11 authority. The deepness of each of such tanks are
12 50 feet. The concrete around each tank are 3 feet
13 thick and iron plates are riveted in concrete. Iron
14 plates and concrete were used for roofing. In the in-
15 side of such tanks there were iron posts constructed
16 to hold the roof. Many pipelines were constructed in
17 connection of all the tanks. A big pipeline were
18 crossing from the tanks to the pier. Plants and trees
19 were used as camouflage. The location of such tanks
20 are between what is now Hot Plant No. 3 and Pipe
21 Plant. At the beginning of the year 1939, the Chamor-
22 ran Administration are informed from the authority
23 to conscript labor to send to Kainan to (Marcus Is.)
24 for another installation for a plane base. The
25 laborers have to be send over there for a three

1 month period. Another bunch of laborers were sended
2 at the beginning of 1940. The wages are ¥1.50 per day
3 and is under the Japanese Naval Operations.

4 "There were installed gun implacements in 1939
5 here in Saipan (AAA Battery behind the Japanese Naval
6 Headquarters in Garapan, several costal defenses gun
7 in Lanhan, Naftan Point, Agingan Point and Mirchot
8 Point). On the Island in front of Tarapag Harbor
9 were also installed a gun implacement (Maniagaso).
10 In every gun implacement were Navy personnel attached:
11 (Units of the Butai)."
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1 BRIGADIER QUILLIAM (Continuing): May it
2 please the Tribunal, may I direct the Tribunal's
3 attention to the fact that that deposition was written
4 out as the original shows, and as the English copy
5 by the deponent himself.

6 I offer in evidence I.P.S. document No. 6027,
7 being the deposition of Francisco de Borje.

8 THE PRESIDENT: Admitted on the usual terms.

9 CLERK OF THE COURT: Prosecution's document
10 No. 6027 will receive exhibit No. 892.

11 (Whereupon, the above-mentioned document
12 was marked prosecution's exhibit No. 892 and
13 received in evidence.)

14 BRIGADIER QUILLIAM: I will read an excerpt.

15 (Reading): "Date: 16 March 1946.

16 "I was born on April 3rd 1887 on Guam, I
17 came to Saipan in 1899 went to Angau in the Peleiu
18 Island group and returned to Saipan in Feb. 1946. I
19 worked as foreman for 800 workers in the Phosphorus
20 Company there, first for the Germans then the Japanese.
21 I knew of the building of an airfield on Peleiu in
22 1939."

23 I offer in evidence I.P.S. document No. 6018,
24 being the deposition of Jose S. Pangelinan.

25 THE PRESIDENT: Admitted on the usual terms.

1 CLERK OF THE COURT: Prosecution's document
2 No. 6018 will receive exhibit No. 893.

3 (Whereupon, the above-mentioned document
4 was marked prosecution's exhibit No. 893 and
5 received in evidence.)

6 BRIGADIER QUILLIAM: I will read an excerpt.

7 (Reading): "Date: 15 March 1946.

8 "I was born on Saipan, 27 March 1904; I was
9 10 years old in 1914 on October when the Japanese took
10 this Island (Saipan) from the Germans, I entered the
11 Japanese School, and at the same time, they gave me
12 a job as Messenger in the Japanese Milt. Govt. Head
13 office: In 1916 they change my job and put me as an
14 Interpreter in Japanese & Chamorro: In 1919 I quit work
15 and went to Japan (to school) study music and business
16 course, until 1923 when the big earthquake destroyed
17 Tokyo, I returned and work with my Father at the
18 farm (after I returned from Japan never had a chance
19 to get a job: In 1926 I went to Guam trying to get
20 permission from the Governor of Guam to reside on the
21 Island, but I failed; I married a Guam girl and re-
22 turned to Saipan the same year (I was in Guam for 3
23 months) and running my 50 acre sugar plantation using
24 Okinawans tenants, about 11 farmers, until 1934 when
25 the Japanese Government took my plantation away from me

1 and gave it to the N.K.K. (South Sea Development Co.)
2 the reason they said is 'NO NATIVE AUTHORIZED TO USE
3 A JAPANESE AS TENANTS' I know what they mean, and I
4 gave up. In 1923 --"

5 That must be an error, sir. It must be 1933.
6 1935.

7 (Reading continued): "In 1935 I went to
8 Ponape, started my own business (using native laborers)
9 as a copra trader, and sea transportation also. In
10 1940 they took my motor boat and sampan to use for
11 transporting materials from mainland to the small
12 islands around Ponape for installation; I returned
13 again to Saipan early in 1940 and on May the same year
14 I found my job at the seaplane base, using a bull cart,
15 as a material transporter from the Navy Ware Houses to
16 the contractors that working at the Seaplane Base. I
17 worked till September the same year, and during this
18 time, I noticed that there was 2 hangars, ware houses
19 containing a big quantity of food, lumbers, nails,
20 wires of all kinds and construction materials, small
21 airplanes, big air planes, etc: 1 Big overground heavy
22 builded concrete shelter containing all kinds of
23 explosives, bullets, bombs --- etc.: 2 or 3 repair
24 shop for servicing airplanes; about 8 or 10 Big Barracks
25 that can hold about 350 to 500 men each. During this

1 time (my working time) I became very acquainted with
2 many of the Navy Boys and they told me openly that
3 all of this work is for the military purposes.

4 "I did not working direct to the Navy, but
5 for the contractors, and my working hours is from
6 0600 to 1700 with one 30 minutes during the morning
7 and another 30 minutes in the evening, 1½ hour at noon
8 recess time. They feed me 3 times a day and paid me
9 ₡ 5.00 (five yens) per day.

10 "I noticed too that there was always 15 up
11 to 25 Big 4 propellers Seaplane and some fighting and
12 scouting plane. When they stopped me working at the
13 Seaplane Base, I helped my father who was a chief of
14 Section #2 in Garapan, issued laborers for the Air
15 Strip at Aslito and also for the load and unloading of
16 Ships at Tenapag, Chalan Kanoa & Tenian."

17 May it please the Tribunal, may I point out
18 that that deposition also was written out by the
19 deponent.
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21
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25

Greenberg & Eder

1 I will now read an excerpt from this depo-
2 sition.

3 "Taken at: Moon Island, Truk and Central
4 Carolines.

5 "Date: February 25, 1946.

6 "Q. State your name, permanent home address,
7 and occupation.

8 "A. Alfred Milo, assistant chief, Moon Island.

9 "Q. How long have you lived on the island of
10 Moon?

11 "A. Forty-five years.

12 "Q. How long have you been living in the Truk
13 Atoll?

14 "A. Forty-five years.

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

18 "A. Yes.

19 "Q. State what you know of your own knowledge
20 about the installations?

21 "A. During the latter part of 1938 the Japanese
22 started constructing a lighthouse on the eastern tip
23 of Moon. Prior to the constructing of the lighthouse
24 a dock was built along the eastern tip and then a road
25 from the dock to where the lighthouse was to be erected.

1 It required approximately one year to complete the
2 dock, road and lighthouse. Upon completion of the
3 aforementioned project the Japanese commenced build-
4 ing caves, gun emplacements, and a searchlight plat-
5 form. Six gun emplacements were built. The guns
6 appeared to me to have an eight or nine inch bore.
7 These installations were all in the immediate vicini-
8 ty of the lighthouse. During November of 1939 on the
9 mountain of Uitibium the Japanese dug a concrete em-
10 placement similar to a hut in which they installed
11 radar and erected two gun emplacements for the in-
12 stallation of five or six inch guns and two smaller
13 ones for anti-aircraft. In the same section two
14 platforms were constructed and searchlights placed
15 thereon. Two caves were dug into the mountain and
16 ammunition stored therein. Upon the completion of
17 this project in 1940 further development thereabouts
18 was unknown to us because it was then made a prohibited
19 area. On the eastern end of the island a radio sta-
20 tion was installed during 1939. This building was
21 constructed of concrete. In 1940 on the northwest
22 tip of the island the Japanese commenced building an
23 airstrip. This strip was completed after December
24 1941. On the southwestern tip of the island at the
25 same time another airstrip was under construction and

1 completed after December 1941. In 1940 on the north-
2 western tip of the island on the side of the mountain
3 close to the airfield two gun emplacements were con-
4 structed and guns installed there. They appeared to
5 me to have eight or nine inch bores, also a platform
6 and searchlight was installed there.

7 "Q Were any revetments built along the airstrip
8 prior to December 1941?

9 "A. On the airfield on the southwestern tip one
10 was built before December 1941.

11 "Q. When were all the pill boxes along the shore
12 of Moon Island constructed?

13 "A. After December 1941.

14 "Q. I notice on the mountain of Utibium many
15 big guns, machine guns, range finder, cave housed flat
16 trajectory guns, and anti-aircraft guns, other than
17 the ones already mentioned by you; when were these
18 constructed?

19 "A. After December 1941, I believe for we were
20 not allowed to go there after the initial construction
21 in 1939 and 1940.

22 "Q. I notice on the southern tip, slightly in
23 rear of the airfield, anti-aircraft guns, cave housed
24 guns, and machine guns; when were these placed there?

25 "A. After December 1941.