

EXHIBIT No. 3220

(8)

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

UNITED STATES OF AMERICA, et al

-vs-

IRAKI, Sadao, et al.

AFFIDAVIT OF  
INADA, Shuichi

I, INADA, Shuichi, having been duly sworn on oath as on the attached sheet in accordance with the custom followed in my country, hereby depose and state as follows:

I was Chief of the General Affairs Section of the Cabinet Secretariat from November 1937 until April 1945. Thus I was in this position when Mr. HOSHINO, Naoki, was president of the Planning Board and Minister Without Portfolio in the Second KONOYE Cabinet in 1940, and sometime later, after his appointment as Chief Secretary of the TOJO Cabinet in October 1941, I served under him. One of my duties was to be in charge of the documents filed in the Cabinet Secretariat.

Next I shall speak about the matter of how "explainers" attend the Privy Council meeting. In my position with the Cabinet Secretariat I used to receive notices from the Secretary of the Privy Council to arrange to send the minimum number of explainers necessary to attend a particular meeting of the Privy Council. I would then notify the various ministers to this effect and they in turn would decide on and issue orders to their subordinates as to who would attend the meeting as explainers to assist them.

About six o'clock in the evening of the day when General TOJO was appointed by the Emperor to form a cabinet in October 1941, as I recall, I was requested to see him quite suddenly. When I visited him at the official residence of the War Minister, Colonel Akamatsu, who later became the secretary to the Premier, was also there waiting for me. General TOJO said to me that, being appointed as Prime Minister, he had to select someone as Chief Secretary to the Cabinet. However, he was not familiar with the affairs of the civil service and he wanted me to state frankly my opinion on what kind of person could be deemed proper for the post of Chief Secretary, and who would be most fitting to discharge the secretarial business from the point of view of those of us in the Cabinet Secretariat who would be under him. I first hesitated to answer but, being rather pressed by Colonel Akamatsu for my unreserved opinion, I stated my general opinion to the following effect: The Chief Secretary should be first, a man of ability without being autocratic and second, should have a good record in the civil service. General TOJO then gave me the names of some persons, one of whom was Mr. HOSHINO. He asked me if we, the

secretariat, could discharge our business smoothly under him. I replied that Mr. HOSHINO had had much experience in official business so that I thought him the proper person for the post and that we of the Secretariat could work well under him. General TOJO then asked me concerning the procedure to be followed in forming a cabinet, after which he thanked me for my opinion and I left. The next day I learned that Mr. HOSHINO had been appointed Chief Secretary of the Cabinet. After his appointment, Mr. HOSHINO told me that all he had been doing after resigning from the KONOYE Cabinet in April 1941 and until just before his recent appointment was to travel around Japan.

It was part of the prescribed duties of the Chief Cabinet Secretary to have Imperial Rescripts prepared in the Secretariat. Accordingly, during the latter part of November 1941, Mr. HOSHINO ordered me to prepare an Imperial Rescript to be issued in the event the negotiations with the United States should be successful, and another Imperial Rescript proclaiming a state of war with the United States and Great Britain. The former was listed on a memorandum which Mr. HOSHINO gave me saying, "This should also be prepared as it may be necessary." The memorandum was written in pencil in Mr. HOSHINO's handwriting, containing five items listing things to be done in the event the negotiations with the United States were successful, and read: "Measures to be taken in case Japan should suffer great hardship -- (1) Request the Emperor to proclaim Imperial Decree -- Settle the People's Minds and Retention of the National Power." This is as much as I remember of what I read. The memorandum was then typed and I returned it to Mr. HOSHINO. The memorandum was placed in the Secretariat files and was later destroyed by fire as I heard during an air raid in 1945.

After receiving this memorandum from Mr. HOSHINO I began drafting the Imperial Rescript. I showed the draft Rescript for peace to Mr. HOSHINO early in December, I believe it was, after he had told me to hurry the preparation of it. After looking it over, he did not approve the draft but returned it to me for reconsideration. It was my intention at the time to revise the draft and resubmit it, but the press of other business was too great and it remained in a pending status until after the outbreak of the Pacific war. If this draft had been needed for actual use, the normal course would have been to revise it several times until the Rescript was satisfactory.

I cannot remember now the exact contents of this draft of the Imperial Rescript for peace. However, its general purport was that Japan would be put in a very difficult position but that the Japanese people should endeavor to maintain the national strength and keep friendly relations with the other nations of the world. This draft was, of course, never used. After the outbreak of hostilities I destroyed the only two copies of the draft which had been made, i.e., the one in my own handwriting and the other which I had shown Mr. HOSHINO but which he had returned to me. This destruction was done since it was recognized that there was no further need for the drafts and also because it was a practice in the Cabinet Secretariat that, inasmuch as Imperial Rescripts are issued from the Throne, all preparatory drafts had to be burned.

On this 16th day of September 1947  
At Tokyo.

DEPONENT: /s/ INADA, Shuichi (seal)

OATH

In accordance with my conscience I swear to tell the whole truth withholding nothing and adding nothing.

/s/ INADA, Shuichi (seal)

I, MIGITA, Masao, hereby certify that the above statement was sworn by the Deponent, who affixed his signature and seal thereto in the presence of this Witness.

On the same date at Tokyo.

Witness: /s/ MIGITA, Masao (seal)