

EXHIBIT No. 3234

(15)

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al.

* vs -

ARAKI, Sadao, et al.

S W O R N D E P O S I T I O N

Deponent: KAMEYAMA, Kazuji.

Date of birth: December 9, 1895

Domicile: 885 Kurachi, Seki-Machi, Gifuken

Having first duly sworn an oath as on the attached sheet, in accordance with the procedure prevailing in my country, I hereby depose as follows:

(1) I entered the service of the Foreign Office in February 1922 and retired from office in March 1946. I held a post in the First Section, Bureau of European and American Affairs (afterwards Bureau of European-Asiatic Affairs) from February 1922 to March 1927, taking charge of business concerning the Soviet Union. As to the problems of the conclusion of the Soviet-Japanese Non-Aggression Pact and the purchase of the East China Railway upon which I depose here, I was directly in charge of the business concerning them while I was in the above post. Further, I served at the Japanese Embassy at Moscow first as a second secretary from May 1935 to November 1937, and then as a councillor from December 1942 to March 1945.

(2) In December, 1931, Ambassador YOSHIZAWA, on his way home from Paris to be appointed as Foreign Minister in the INUKAI Cabinet, visited Moscow and called on Litvinov, the People's Commissar for Foreign Affairs, on the 31st of that month, accompanied by Mr. HIROTA, Koki, who was then the Japanese Ambassador at Moscow. On that occasion, I was informed, Mr. Litvinov suggested to Ambassador YOSHIZAWA the conclusion of a non-aggression pact.

Mr. YOSHIZAWA arrived at Tokyo in January 1932, the following year, and assumed the office of Foreign Minister. But the assassination of Premier INUKAI on May 15, that year, caused the fall of the Cabinet and Mr. YOSHIZAWA also resigned from his post. During the period when Mr. YOSHIZAWA was Foreign Minister, so far as I know, no further approach was made by the Soviet Government to Ambassador HIROTA with reference to the said problem.

(3) In his interview with Ambassador HIROTA in August 1932, Mr. KARAHAN, the Acting People's Commissar for Foreign Affairs, while talking about general problems between Japan and the Soviet Union, expressed the intention on the part of the Soviet Government to proceed with the negotiations for a non-aggression pact. Ambassador HIROTA, in reply, pointed out that there were in Japan not a few people who held traditional opposition toward such things as arbitration or non-aggression pacts no matter what country might be the other party, laying stress upon the necessity of making efforts to prepare in advance the atmosphere and state of mind of the people. He further informed the Soviet Acting Commissar that he was to leave Russia for his home country shortly, and promised him to convey the intention of the Soviet Government to the Japanese Government. I came to know the above facts through the telegraphic reports from the Japanese Embassy at Moscow addressed to the Japanese Foreign Office. I was also informed of these facts by Ambassador HIROTA in person after his arrival in Japan.

(4) Ambassador HIROTA arrived in Japan in October 1932. He conveyed to Foreign Minister UCHIDA the desire on the part of the Soviet Government with reference to the conclusion of a non-aggression pact and urged the negotiations for it. This I learned from a certain superior official in the Foreign Office. Mr. HIROTA was placed on the waiting list shortly after that, and went to the country to enjoy a secluded life there.
and to remove a potential source of friction.

(5) On December 13, 1932, Foreign Minister UCHIDA sent a note to Soviet Ambassador Troyanovsky to the effect that the Japanese Government considered that the time was not yet ripe for starting negotiations for the suggested pact, and that it was believed to be desirable that both Governments should wait for a proper chance, devoting themselves, for the time being, to settling various questions pending between the two countries. To this official note the Foreign Minister referred in his address made at the Imperial Diet on January 21, 1933.

(6) The problem of the purchase of the East China Railway was for the first time taken up by the Governments of Japan and the Soviet Union, so far as I know, in April 1932, when Ambassador Troyanovsky first suggested it to Foreign Minister YOSHIZAWA. The Soviet Ambassador called on the Foreign Minister to obtain the latter's understanding as to the commencement of private negotiations for the selling of the said Railway, and then had conversations with Mr. FUJIWARA, Ginjiro, several times, without achieving any concrete result.

(7) In August 1932, Ambassador HIROTA, in an interview with Mr. KARAHAN, the Acting People's Commissar for Foreign Affairs, mentioned in the present deposition (3), suggested the purchase of the East China Railway, and KARAHAN expressed his consent to the suggestion. A few days after that, Mr. KARAHAN told the Japanese Ambassador, it is said, that a certain influential Cabinet member of the Soviet Government agreed to the selling of the said Railway as a matter of principle.

(8) At that time I was told by a certain superior official in the Foreign Office that Ambassador HIROTA advised Foreign Minister UCHIDA, directly after his arrival in Japan, that the purchase of the East China Railway should be urged in order to promote the Soviet-Japanese friendship and to remove a potential source of friction.

(9) On May 2, 1933, Soviet People's Commissar for Foreign Affairs Litvinov formally proposed to Ambassador OTA, who had succeeded Mr. HIROTA, to open negotiations for the selling of the East China Railway. The negotiation was started, as a result, on June 27, that year, at Tokyo between the delegations of the Soviet Union and Manchoukuo.

(10) The crucial point of the negotiation was the question of the selling price of the Railway. The direct negotiations between the Soviet and Manchoukuo delegations which dragged on for about one year were full of difficulty, and they often came to a standstill. To state the general progress of the negotiations, the Soviet side demanded, at the official conference of the beginning of July 1933, to receive 250,000,000 gold rouble -- that is, about 625,000,000 yen in Japanese money according to what the Soviet Government claimed to be the officially fixed exchange rate -- for the railway, and maintained that the retiring allowance for the Soviet employees of the railway company should be paid by the Manchoukuo Government. Whereas, the Manchoukuo side proposed to pay 50,000,000 yen for the railway. After that, the Soviet side proposed, at a comparatively earlier stage of the negotiations, to reduce the selling price by 50,000,000 rouble. Further, in February 1934, it proposed to fix the selling price of the railway as 200,000,000 yen in Japanese money. On the other hand, the Manchoukuo side proposed to raise the purchase price by 50,000,000 yen in April, that same year. And on July 23, after many disputes, Foreign Minister HIROTA suggested an intermediary plan that the selling price should be 120,000,000 yen and that the retiring allowance for the Soviet employees should be paid by the Manchoukuo Government. The Manchoukuo side expressed its willingness to accept the plan, but the Soviet side rejected, showing its own counter-plan of demanding 160,000,000 yen for the East China Railway. In this way, the negotiations between Manchoukuo and the Soviet Union were brought to a deadlock in August 1934.

Hereupon, conversations were held successively between Foreign Minister HIROTA in the capacity of an intermediary and Ambassador Yurenev of the Soviet Delegation, which progressed smoothly. And an agreement was attained in outline between the two, at the end of the year, resulting in the signing, on March 23, 1935, of the Agreement concerning the East China Railway between Manchoukuo and the Soviet Union, which contained stipulations that the selling price of the railway should be fixed to be 140,000,000 yen and that the retiring allowance for the Soviet employees, 30,000,000 yen, should be paid by the Manchoukuo Government.

(11) The telegram referred to in the present deposition (3) and the note of Foreign Minister UCHIDA sent to Ambassador Troyanovsky mentioned in (5), having been lost in the fire during the war, are not found in the files of the Japanese Foreign Office now.

On this 22nd day of August, 1947, at Tokyo.

(Signed) KAMEYAMA, Kazuji (SEAL)

Sworn to and subscribed before me on the above-mentioned date and place.

(Signed) MORISHIMA, Goro (SEAL)

Witness.

O A T H

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

(Signed) KAMEYAMA, Kazuji (SEAL)

ERRATA SHEET

Defense Document 2464

The following correction should be made on Affidavit of KAMEYAMA,
Kazuji.

Page 1, Paragraph 1, Line 4;

Add "and from November 1930 to May 1935"
after "from February 1922 to March 1927"
and between ",,".