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Date: 29 Jan 1948

EVIDENTIARY DOC. NO. 3336

TRIAL BRIEF \_\_\_\_\_

EXHIBIT NO. \_\_\_\_\_

BACKGROUT DOC. NO. \_\_\_\_\_

FILE NO. \_\_\_\_\_

PRESSTRANS \_\_\_\_\_

U.S.S.B.S. \_\_\_\_\_

DEFENSE DOC. NO. \_\_\_\_\_

Signature Cole - Robinson

Room # 370 - 377



Doc. 3336 - Cert

FILE COPY  
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證 明 書

一、私吉田英三以下ノ事ヲ證明致シマス。  
 「建造中」ナル語ハ日本海軍ニ於イテ用ヒ  
 ラレタ場合又私ガ法廷誓證九一六號ト三〇  
 〇三一二號作成ニ當リ特定期日ニ於ケル日  
 本海軍々艦ノ記事ニ於イテ用ヒタ場合ニ  
 ハ、新造艦船ノ場合ニハ起工サレタ事ヲ意  
 味シ、改造艦船ノ場合ニハ特定ノ期日或ヒ  
 ハソノ以前ニ艦船ノ改造作業ガ始マツタ事  
 即チ改造又ハ改装ガ始マツタ事ヲ意味スル  
 ノデアリマス。

3838 - C

二、「引渡」ナル語ハ日本海軍ニ於イテ用ヒラ  
 レタ場合又私ガ法廷誓證九一三號、九一七  
 號及ビ九一八號及ビ關係文書ヲ作成スルニ  
 際シソノ中ニ記サレタ特定期日ニ於ケル日  
 本海軍々艦ノ説明中ニ用ヒタ場合ニハ艦船  
 ガ完成シ、建造者ヨリ艦長ヲ通ジテ海軍大  
 臣ニ引渡サレタコトヲ意味スルノデアリマ  
 ス。

三、「保有量」ナル用語ハ日本海軍ニ於テ用ヒ  
 ラレタ場合又私ガ法廷誓證九一三號九一六  
 號九一七號九一八號三〇〇三一二號及ビ關



係文書作成ニ際シ特定期日ニ於ケル日本海軍ノ艦船ノ記事ニ用ヒタ場合ニハ特定期日或ヒハソレ以前ニ完成シ引渡サレ艦籍ニ編入サレ日本海軍ノ戦闘勤務ニ就クベク概略準備ノ成ツタ艦船ヲ意味スルノデアリマス。殆ンド凡テノ場合一九四一年十二月七日保有ノ艦船ハ既ニ就役シテキタノデアリマス。

四、「就役」ナル語ハ日本海軍ニ於テ用ヒラレタ場合又ハ私ガ法廷書證九一三號九一七號九一八號及ヒ關係文書ヲ作成スルニ際シ用ヒタ場合ニハ艦船ハ艦籍ニ編入サレタノテ海軍大臣ノ命ニ依リ艦隊又ハ相當勤務單位ノ責任長官ノ指揮下ニ置カレタ事ヲ意味スルノデアリマス。「就役」ナル語ハ戰艦、空母、巡洋艦、驅逐艦及潜水艦ノ場合ニハ艦船ガ完成シ、引渡サレ、艦籍ニ編入サレ砲彈藥、航空機及乗組員ヲ必要トサレテキル如ク整備シテ、戦闘勤務ニ就クベク準備ガ成ツタ事ヲ意味スルノデアリマス。就役



期日及其ノ後、斯カル艦船ハ艦隊若クハ相當勤務單位ノ作戰單位トナリ、艦船及航空機人員ノ繼續的訓練及日常ノ検査ヤ修理ヲ行ハナケレバナラナイノデアリマス。『引渡』ト『就役』ハ一九四一年十二月七日以後ニ於テハ通例同日ニ行ハレタノデアリマス。

五、『其ノ他』ナル語ハ主力艦、航空母艦、巡洋艦、驅逐艦及潜水艦ヲ除イテ、艦籍ニ編入サレテキル凡ユル艦船ヲ含ンテ居リマス。一九四一年十月七日、日本海軍ノ分類、『其ノ他』ハ以下ノ型ノ艦船カラ成リ立ツテ居リマシタ。即チ、水上機母艦、潜水母艦、機雷敷設艦、掃海艇、海防艦、水雷艇、砲艦、驅潜艇、哨海艇、海底電線敷設船及ビ特務艦、即チ練習艦、貨物船、海軍油槽船、碎氷艦、標的艦、工作艦、給糧船デアリマス。

六、『保有量』『建造中』『就役』『引渡シ』及ビ『其ノ他』ナル語ニツキ、合衆國海軍ニ於テ用ヒラレル場合ノ專問的意義ハ私ハ正



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ル

確ニ知ツテ居リマセンデシタガ、日本海軍  
將校トシテ、ソレカラノ語ニ對スル私ノ解  
釋ハ上述ノ法廷誓證ヲ作成シ得ルニ足ルセ  
ノデアルト考ヘタノデアリマス。

第二復員局調査課員

吉田英三 / 署名  
捺印

右ハ余ノ面前ニ於テ署名セリ

一九四七年九月二十六日

日本於東京

S. Takano / 署名



Doc. 3336 - Oath

宣誓書

良心ニ從ヒ眞實ヲ述ベ何事ヲモ黙秘セズ  
又何事ヲモ附加セザルコトヲ私ハ誓フ。

吉田英三 / 署名 / 捺印 /

一九四八年一月七日、於東京

宣誓供述書 吉田英三

私、認識 番號第〇二六四〇八三號ノ大尉  
T、D、ホワイト (M.H.H.) ハ右陳述  
ガ宣誓供述者ニ依リ宣誓サレ、本立會人ノ  
面前デ本書ニ署名捺印セルコトヲ茲ニ證明  
ス。

同日於東京

立會人 大尉 T D ホワイト / 署名 /

WHITE



IPS DOC. NO. 3336

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OATH

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

YOSHIDA, HIDEKI  
YOSHIDA, HIDEKI

On this 7th day of January 1948

At Tokyo

Deponent: YOSHIDA, Hideki

I, Capt. T. D. White, 0264083, hereby certify that  
the above statement was sworn to by the deponent, who affixes  
his signature and seal thereto in the presence of this witness.

On the same date

At Tokyo

Witness: Capt. T. D. White



CERTIFICATE

1. I, Hidemi YOSHIDA, hereby certify that the term "UNDER CONSTRUCTION" as used in the Japanese Navy and as used by me in preparing Exhibits 916 and 3003-B showing combatant vessels of Japan as of the dates specified means, in the case of new vessels, that the keels had been laid, and in the case of converted vessels, that the conversion had been commenced on or before the specified dates, that is to say, that reconstruction or re-equipment had commenced.

2. The term "Delivered" as used in the Japanese Navy, and as used by me in preparing Exhibits 913, 917 and 918 and related documents showing combatant ships in the Japanese Navy as of the dates specified therein, means that such vessel had been completed and had been delivered by the builder to the Navy Minister through the Captain of the vessel.

3. The term "On Hand" as used in the Japanese Navy and as used by me in preparing Court Exhibits 913, 916, 917, 918, 3003-A and 3003-B and related documents showing ships in the Japanese Navy as of the dates specified, means that such ships had been completed, and delivered and entered in the Naval Registry, and were generally ready for operational service in the Japanese Navy on or before the dates specified. In practically all cases, ships "On Hand" on 7 Dec 1941 had already been commissioned.

4. The term "Commissioned" as used in the Japanese Navy and as used by me in preparing Exhibits 913, 917, 918 and related documents means that the ship having been entered in the Naval Registry had been placed by order of the Navy Minister under the command of the responsible commander of a fleet or of a comparable service unit. The term "Commissioned" means in the case of battleships, carriers, cruisers, destroyers, and submarines that the vessel had been completed, delivered, registered and made ready for operational service, equipped as required with guns, ammunition, planes and operating personnel. On and after the date of commissioning such ship became an operating unit of the Fleet or of a comparable service unit subject to the continuing training of personnel of the ships and planes and to routine tests and repairs. After 7 December 1941, Delivery and Commissioning usually occurred on the same date.

5. Under the term "Miscellaneous" are included all ships listed in the Naval Registry, with the exception of capital ships, aircraft carriers, cruisers, destroyers and submarines. On 7 December 1941, the Japanese Navy's category "Miscellaneous" consisted of the following types of ships: Sea-plane tenders, submarine tenders, mine layers, mine sweepers, coast defense ships, torpedo boats, gun boats, sub-chasers, patrol



boats, cable layers, and special service ships, namely, training ships, cargo ships, Navy tankers, ice breakers, target ships, repair ships, and provision ships.

6. Although I did not have accurate knowledge of the technical meaning of the terms, "On Hand", "Under Construction", "Commissioned", "Delivered" and "Miscellaneous" as used in the United States Navy, I considered that as a Japanese Naval Officer my understanding of the terms was adequate to enable me to prepare the above mentioned exhibits.

Signed before me at Tokyo, Japan,  
on this 26 day of September 1947.

/s/ S. Takano  
S. TAKANO

/s/ Hidemi Yoshida  
HIDEMI YOSHIDA  
Member Research Div.,  
2d Demobilization Bureau



I. P. S. FILE UNIT

DATE: 20 Jan 1948

I. P. S. Evidentiary Document Number 3336

has been received in the Office of the Clerk of the Court.

Signature: W Haine

For Clerk of Court



INTERNATIONAL PROSECUTION SECTION

Doc. No. 3336

27 Jan 1948

ANALYSIS OF DOCUMENTARY EVIDENCE

DESCRIPTION OF ATTACHED DOCUMENT

Title and Nature: Certificate of Yoshida, Hidemi Defining Terms  
Used in the Preparation of Court Exhibits

Date: 26 Sept 1947 Original  Copy  Language: Japanese

Has it been translated? Yes  No

LOCATION OF ORIGINAL

IPS Document Division

SOURCE OF ORIGINAL: Sworn statement

PERSONS IMPLICATED: None

CRIMES TO WHICH DOCUMENT APPLICABLE: None

SUMMARY OF RELEVANT POINTS

Analyst: JAMES HOYT

Doc. No. 3336



INTERNATIONAL PROSECUTION SECTION

Doc. No. 3336

(Date) Jan 20, 48

ANALYSIS OF DOCUMENTARY EVIDENCE

DESCRIPTION OF ATTACHED DOCUMENT

Title and Nature: *Certificate of Yoshida, Hidemi*  
*defining terms used in the preparation of court exhibits*

Date: *26 Sept 47* Original  Copy  Language: *Jap*

Has it been translated? Yes  No

LOCATION OF ORIGINAL *IPS Doc Div*

SOURCE OF ORIGINAL: *Sworn statement*

PERSONS IMPLICATED: *None*

CRIMES TO WHICH DOCUMENT APPLICABLE:

*None*

~~SUMMARY OF RELEVANT POINTS~~

Analyst: *JH*

Doc. No. 3336