

NARRATIVE SUMMARY OF THE RECORD
August 26, 1947
DEFENSE - Division V - Pacific
MILITARY PREPARATIONS

Page 4119

TERAI- Direct Exam.

Page

Direct Examination of TERA I, Kunizo.

26879
26880

* The witness stated he lived in Yokosuka. He identified Exhibit #3017 as his affidavit and verified it. * The affidavit stated that from December 15th 1938 to November 1, 1939 he was commander of the 16th Air Group stationed at Tongking Bay and he took part in the South China operations.

26881

The bombing incident of Takkei in FIC August 26, 1939 was believed to have been caused by one of his airplanes when he was commander of the 16th Air Group. About August 28, 1939 * there was a telegram sent from the Navy Ministry, Naval Affairs Bureau Chief for a detailed investigation and report because of the Incident of the dropping of a bomb on the Takkei by a seaplane on August 26, 1939, with the possibility of involving an airplane of the 16th Air Group. The 16th Air Group was the only seaplane unit operating in that area at the time. The witness was charged with the investigation.

26882

It was concluded that transportation of war supplies into China through FIC was being carried out in a brisk manner. The 16th Air Group received orders to check it and continued daily patrol activities in the FIC and China border areas. On the day of the incident three planes conducted a reconnaissance mission, each carrying two bombs with instructions to attack targets which would disrupt communication lines and in case such targets were not observed *to bomb air fields, bridges or military installations in the Tungchow area.

From the reports submitted after returning from the mission, the witness learned that one plane got astray due to poor weather conditions. The plane continued to encounter unfavorable weather and was compelled to fly at a low altitude. Worried about returning to the base, he decided to jettison the bombs to extend the cruising range. He spotted a town which appeared to be Fungchow, the designated target area. However, since he was not sufficiently confident and since it was after the Panay Incident and he was under strict orders to respect foreign interests, he avoided bombing the city limits and dropped the bombs in the suburbs.

NARRATIVE SUMMARY OF THE RECORD
August 26 1947
DEFENSE - Div V Pacific
MILITARY PREPARATIONS

Page 4120

TERAI- Direct Exam.

Page

26883

* In compliance with the telegram, a detailed investigation was made but since there was no other plane he presumed the above plane had without knowing it penetrated into FIC and the point which the airplane thought to be the Fungchow area was actually the Takkei vicinity. He reported to this effect. He could not understand compared with the bombs that were carried why casualties were extremely high as reported. Judging from the fact that the planes avoided city limits, it is still doubtful to him. He did not dream that the FIC territory was bombed and did not confirm the bombed locality.

Japan, based on this report took up the case through diplomatic channels and expressed its regret, to the FIC authorities and he learned that reparations were made.

8 Sep. 1947

MEMORANDUM FOR: Mr. Sutton
FROM : EDWARD P. MONAGHAN, Chief,
Investigative Division, IPS
SUBJECT : Defense Witness

1. Please find attached hereto list of material available on the following witness and/or witnesses.

DEFENDANT

General Witness

WITNESS

TERAI, Kunizo

LIST OF MATERIAL AVAILABLE

Curriculum Vitae

2. Please acknowledge receipt of this memorandum by initialling and returning attached carbon copy to this office, Room 300.

EP M

EDWARD P. MONAGHAN

Incl
(Described above)

Prefecture and Status: TOCHIGI Prefecture. Warrior Class.
Former Status:
Date of Birth: Aug. 3, 1900.
Name: TERAJ, Kunizo
Former Name:

Aug. 26, 1919 Appointed a Naval Academy Officer Candidate by the
Naval Academy.
June 1, 1922 Certified a graduate of the course at the Naval Academy
by the Naval Academy.
June 1, 1922 Appointed a midshipman by the Navy Ministry.
June 1, 1922 Ordered to serve on board the IZUMO by the Navy Ministry.
Feb. 12, 1923 Relieved of duty on board the IZUMO and ordered to serve
on board the ISE by the Navy Ministry.
Sept. 20, 1923 Appointed an Ensign by the Cabinet.
For purpose of study, ordered to serve on board the ISE
by the Navy Ministry.
Oct. 10, 1923 For purpose of study, ordered to serve on board the ISE.
Dec. 10, 1923 Ordered to serve on board the ISE by the Navy Ministry.
Conferred with the 8th Court Rank, Senior Grade.
July 4, 1924 Relieved of duty on board the ISE.
Dec. 10, 1924 Appointed as a student in the regular course at the
Naval Gunnery School by the Navy Ministry.
Apr. 20, 1925 Appointed a student in the regular course at the Naval
Torpedo School by the Navy Ministry.
Aug. 5, 1925 Appointed to serve on board the YAMASHIRO by the Navy
Ministry.
Sept. 21, 1925 Relieved of his main post and attached to the KASUMIGAURA
Naval Air Group by the Navy Ministry.
Dec. 1, 1925 Appointed a student in the Aviation School of the KASUMIGAURA
Naval Air Group by the Navy Ministry.
Jan. 15, 1926 Appointed a Lieutenant (j.g.) by the Cabinet.
Conferred with the 7th Court Rank, Junior Grade.
May 29, 1926 Attached to the SASEBO Naval Air Group by the Navy Ministry.
May 5, 1927 Relieved of his main post and appointed to serve on board
the NOTORO by the Navy Ministry.
Dec. 1, 1927 Appointed a naval Lieutenant by the Cabinet.
Dec. 2, 1927 Attached to the KASUMIGAURA Naval Air Group and concurrently
appointed as an Instructor by the Navy Ministry.
Conferred with the 7th Court Rank, Senior Grade.
Oct. 18, 1928 Attached to the YOKOSUKA Naval Air Group by the Navy Ministry.
June 1, 1929 Attached to the SASEBO Naval Air Group by the Navy Ministry.

TERAI, Kunizo (continued)

June 15, 1929 Ordered to serve on board Submarine No. A-51 by the Navy Ministry.

Nov. 15, 1929 Ordered to serve on board the HARUNA by the Navy Ministry.

Jan. 10, 1930 Attached to the YOKOSUKA Naval Air Group as Division Chief by the Navy Ministry.

June 1, 1930 Concurrently appointed as Instructor in the YOKOSUKA Naval Air Group by the Navy Ministry.

Oct. 1, 1930 Attached to the YOKOSUKA Naval Yard by the Navy Ministry.

Apr. 1, 1932 Appointed to the Aircraft Experimental Department of the Naval Air Depot by the Navy Ministry.

June 2, 1932 Appointed concurrently to serve on board the ATAGO by the Navy Ministry.

Dec. 1, 1932 Relieved of his concurrent post by the Navy Ministry.

Feb. 15, 1933 Conferred with the 6th Court Rank, Junior Grade.

Apr. 29, 1934 Awarded the Imperial Order of the Sacred Treasure, 6th Class.

Apr. 29, 1934 Awarded the Imperial Order of the Sacred Treasure, 5th Class for services in the 1931-1934 Incident.

Nov. 1, 1934 Appointed YAMASHIRO Air Chief and concurrently Division Chief by the Navy Ministry.

Nov. 15, 1934 Appointed a Lieutenant Commander by the Cabinet.

Oct. 15, 1935 Appointed a member of the Aircraft Experiment Department of the Naval Air Depot by the Navy Ministry.

Oct. 29, 1937 Appointed an inspector in the Aircrafts Department of the HIRO Navy Yard and concurrently a member of the General Affairs Department by the Navy Ministry.

Apr. 1, 1938 Conferred with the 6th Court Rank, Senior Grade.

Apr. 13, 1939 Awarded the Imperial Order of the Sacred Treasure, 4th Class.

Nov. 15, 1939 Appointed a Navy Commander by the Cabinet.

Nov. 15, 1940 Appointed a member of the Technical Department of the Naval Air Headquarters and concurrently a member of the Navy Technical Council by the Navy Ministry.

Apr. 29, 1940 Awarded the Imperial Order of the Golden Kite, 4th Class for Services in the China Incident.
Awarded the Imperial Order of the Dual Rays of the Rising Sun, 4th Class.

July 15, 1943 Conferred with the 5th Court Rank, Junior Grade.

Jan. 18, 1944 Awarded the Imperial Order of the Sacred Treasure, 3rd Class.

May 1, 1944 Appointed a Navy Captain by the Cabinet.

TERAI, Kunizo (Continued)

May 17, 1944	Concurrently appointed as Munitions Official in the Munitions Ministry by the Cabinet.
July 15, 1944	Appointed a secretary in the Investigation Board for the Unification of Standard Industrial Materials by the Cabinet.
Oct. 11, 1944	Appointed a technical member of the Committee for the Investigation of Science and Technology by the Cabinet.
Nov. 18, 1944	Appointed a member of the Investigation Board for the Unification of Standard Industrial Materials by the Cabinet.
Nov. 15, 1944	Appointed a secretary in the Committee for the Investigation of Science and Technology by the Cabinet.
Feb. 12, 1945	Appointed a technical councillor in the Technical Board by the Cabinet.
June 9, 1945	Dismissed from his concurrent post as munitions administrator in the Munitions Ministry by the Cabinet.

INTERNATIONAL PROSECUTION SECTION

MEMORANDUM

26 August 1947

TO : Mr. Frank S. Tavenner, Jr.
FROM : D. N. Sutton
SUBJECT: YAMAMOTO, Chikao, Def. Doc. No. 2016
TERAI, Kunizo, Def. Doc. No. 2080

I hand you herewith the memorandum prepared by Smith Crowe on each of the two above witnesses.

- (1) As to YAMAMOTO, his affidavit merely confirms the unlawful bombing of a train on a railway in French Indo-China on 2 February 1940. We put in evidence (Ex. 618-A, R. 6856) the French protest with regard to the bombing of this train. The explanation that the crew of the bomber could see the railway track but couldn't see the train is so weak that it does not deserve any cross-examination.
- (2) As to TERAII, objection might be made to this affidavit on the ground that it presents primarily the conclusions of the witness and what he "presumes" happened in this case. He does not purport to have any first hand knowledge of the bombing. This objection applies particularly to all of section 5 of the affidavit, especially that portion of it beginning in the fourth line with, "I presumed" and continuing to the end of section 5. While cross-examination might further discredit the witness, especially in view of his statement in paragraph 4 that the crew were careful to avoid bombing the city since they desired to respect foreign rights but bombed the suburbs of the city, it seems that we could get the idea over to the court in the objection to the admission of the affidavit, especially those parts in which the witness gives his presumptions and guesses, and then decline to cross-examine.

D. N. Sutton

Encl.

Memo to: Mr. D.N. Sutton
From: Mr. S.N. Crowe
Subject: Affidavits of YAMAMOTO, Chikio, Def. Doc. No. 2016 and
TERAI, Kunizo, Def. Doc. No. 2080

25 August 1947

MEMORANDUM TO: Mr. David N. Sutton

FROM: Mr. Smith N. Crowe

SUBJECT: Affidavits of YAMAMOTO, Chikio, Defense Document No. 2016 and TERAJ, Kunizo, Defense Document No. 2080

Pursuant to your memorandum of August 25th, regarding the above affidavits, I herewith submit the following:

1. There is nothing of importance in our files regarding the personal careers or activities of either of these two witnesses. YAMAMOTO was a former rear admiral and at the time of Pearl Harbor, was in charge of an air bureau. In his interrogation, he states that he was not informed of the attack to be made on Pearl Harbor.

2. The Prosecution evidence on these two witnesses is as follows:

a. On p. 6814 of the Record, Exhibit 614-A, which is a business report for the year 1939 published in December 1941, by the South Seas Bureau of the Japanese Government, includes the statement that the French administrator at Hanoi protested the bombing by Japanese sea-planes of Tha Khe, near the border of French Indo-China and China, on August 26, 1939. A protest was made stating that 30 casualties were caused.

b. On pp. 6856 to 6857, Exhibit 618-A, which is another excerpt from the business report of the South Seas section, made in 1940, showing that the French authorities protested on February 5, 1940, the bombing of a railroad train on the Yunnan Railway. The Japanese stated that the bombing occurred for the same reason stated in the affidavit of YAMAMOTO.

3. In my opinion, Defense Document 2016 should be rejected by the Court on the ground that it contains no additional information not already in the Prosecution's evidence. If this is not done, then it might be well to ask the questions bearing on how the bombing was accomplished, i.e., how could the bombing have been so accurate if it was impossible to distinguish as large an object as a train on the track. His affidavit does not show that he was in a position to conduct a close and accurate examination of the bombing crews or of the mission. This might be cleared up by cross-examination. He says that he "later examined aerial photographs of the bombing and discovered a train on the bridge." There is no statement as to whether this examination was

Memo to: Mr. D.N. Sutton
From : Mr. S.N. Crowe
Subject: Affidavits of YAMAMOTO, Chikio, Def. Doc. No. 2016 and
TERAI, Kunizo, Def. Doc. No. 2080

conducted a considerable time after the bombing took place. If the latter is true, the examination of the crews would be inaccurate due to a natural vagueness of memory after the passage of time.

4. It is called to your attention that the affidavit of TERA I admits (at the end of par. 4) that the Japanese seaplanes dropped bombs in the "suburbs" of a town which they took to be Fungohow. In the first place it would appear that this town was their legitimate target and so there would be no need to drop bombs there and any other place than on the target. If they were not sure it was the target, they certainly should not have dropped bombs in the suburbs. Again in this affidavit, there is no indication of when the investigation of the situation took place. Questions directed to a determination of this might be helpful in establishing their inaccuracy. Another inconsistency occurs in the affidavit in par. 4. This is that the planes had instructions to attack targets defecting and disrupting supply communication lines, and in case such targets were not observed to bomb air fields projects or military installations in the Tungchow vicinity (this town is spelled with a "T" and with an "F" in the affidavit). The affidavit then goes on to say that "after returning from the mission" a plan got astray and the incident in question occurred. If the mission had been accomplished, which these words implied, there would be no need to jettison bombs because they would already have been dropped. The witness might be asked questions to clear up these inconsistencies. This witness might also be questioned regarding his knowledge of the mission. He states that each plane carried only two bombs, yet the reports were that there were high casualties. Questions might be directed toward attempting to find out how close to the actual situation he really was.

SMITH N. CROWE

INTERNATIONAL PROSECUTION SECTION

MEMORANDUM

26 August 1947

TO : Mr. Frank S. Tavenner, Jr.
FROM : D. N. Sutton
SUBJECT: YAMAMOTO, Chikao, Def. Doc. No. 2016
TERAI, Kunizo, Def. Doc. No. 2080

I hand you herewith the memorandum prepared by Smith Crowe on each of the two above witnesses.

- (1) As to YAMAMOTO, his affidavit merely confirms the unlawful bombing of a train on a railway in French Indo-China on 2 February 1940. We put in evidence (Ex. 618-A, R. 6856) the French protest with regard to the bombing of this train. The explanation that the crew of the bomber could see the railway track but couldn't see the train is so weak that it does not deserve any cross-examination.
- (2) As to TERA I, objection might be made to this affidavit on the ground that it presents primarily the conclusions of the witness and what he "presumes" happened in this case. He does not purport to have any first hand knowledge of the bombing. This objection applies particularly to all of section 5 of the affidavit, especially that portion of it beginning in the fourth line with, "I presumed" and continuing to the end of section 5. While cross-examination might further discredit the witness, especially in view of his statement in paragraph 4 that the crew were careful to avoid bombing the city since they desired to respect foreign rights but bombed the suburbs of the city, it seems that we could get the idea over to the court in the objection to the admission of the affidavit, especially those parts in which the witness gives his presumptions and guesses, and then decline to cross-examine.

D. N. Sutton

Encl.

INTERNATIONAL PROSECUTION SECTION

25 August 1947

MEMORANDUM

TO : Mr. Smith N. Crowe
FROM : D. N. Sutton
SUBJECT: Defense Witnesses - Pacific Phase -
Military Subdivision

Will you please go over the two following affidavits -

TERAI, Kunizo Def. Doc. No. 2080
YAMAMOTO, Chikao " " No. 2016

and prepare a brief statement of any facts which we have relative to the witnesses, suggested cross-examination, if any, and a statement as to the nature of the Prosecution's evidence and where it appears in the record.

I will appreciate it if you will let me have your report in triplicate as soon as you may reasonably be able to complete it as these witnesses will probably be reached late this afternoon or tomorrow morning.

D. N. Sutton

cc: Mr. Tavenner

Def. Doc. No. 2080

43017

objed to #5 The 7th
witness is the 7th



Translated by
Defense Language Branch

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al
-vs-
ARAKI, Sadao, et al

Sworn Deposition (Translation)
Deponent: TERAJ, Kunizo

Having first duly sworn an oath as on attached sheet and in accordance with the procedure followed in my country I hereby depose as follows.

1. I was formerly a naval captain. From 20 November 1938 to 15 December of the same year I was air-group commander on board the Shinsen Maru, following which, till 1 November 1939 I was commander of an air unit of the 16th Air Group stationed at Tongking Bay and I took part in the South China operations.
2. The bombing incident of "Takkei" (Ph.) in French Indo China on 26 August 1939 was believed to have been caused by an airplane under my command when I was commander of the air-unit of the above mentioned 16th Air Group. And for that reason I know the circumstances in detail. However, a considerable length of time has elapsed since that time and as I have no records of that time in hand, I do not recall exact figures.
3. Around 28 August 1939 a telegram from the Navy Ministry, Chief of Naval Affairs Bureau, was sent to Headquarters 5th Air Corps and also to the 16th Air Group demanding a detailed investigation and a report on existing circumstances, because there was an incident of a seaplane dropping a bomb on "Takkei" in French Indo-China on 26 August 1939 with the possibility of involving an airplane of the 16th Air Group. The reason for ordering an investigation to the 16th Air Group was because it was the only seaplane unit operating in that area at that time. As I was commander of the air-unit of the 16th Air Group I took charge of the investigation.
4. At the time, summing up air-reconnaissance reports and informations from other units it was concluded that

transportation of war-supplies into China through French Indo China was being carried out in a brisk manner. The 16th Air Group received orders to check it and continued daily patrol activities in the French Indo-China and China border areas.

Instructions / On the day of the incident, 26th August, three airplanes type-15 patrol seaplanes, conducted a reconnaissance mission in the border area. Each plane carried two bombs, 60 kilogram bombs for land purposes, with instructions to attack targets effective in disrupting supply communication lines and in case such targets were not observed, to bomb air-fields, bridges or military installations in the Tungchow vicinity.

From the reports submitted by the air crew members of the above three planes, after returning from the mission, I learned that one plane got astray due to poor weather conditions over the border area and took the following course.

The same plane continued to encounter unfavorable weather and was compelled to keep flying at low altitude. Finally it lost the position of the plane and wasted time in attempting to confirm its own position.

why // Getting worried about returning to the base and when it decided to jettison the bombs in order to extend its cruising range, it spotted a town below which appeared to be Fungchow, the designated target area. However, due to the fact that it was not sufficiently confident and as it was after the Panay Incident etc., was under strict orders to respect foreign interests paying special attention in this respect, it avoided bombing the city limits and dropped its bombs in the suburbs.

5. In compliance with the enquiry telegram mentioned above, a detailed investigation of that day's occurrence was made but as there were absolutely no other plane than the one already mentioned, I presumed the above mentioned airplane had crossed the border without knowing it and penetrated into French Indo China due to bad weather and the point which the airplane thought to be the Fungchow area was actually the "Takkei" (Ph.) vicinity and I made out a report to that effect. However, compared with the bombs which were carried, it was hard to understand why "casualties were extremely high" as reported by newspaper telegrams and radio broadcasts.

Def. Doc. No. 2080

Judging from the fact that aircrew members avoided bombing city limits, it is still doubtful to me to this day.

Furthermore, at the time of the incident I did not even dream that French Indo China territory was bombed and so I did not make a confirmation of the bombed locality.

6. The Japanese Government, based on the above mentioned report took up the case and through diplomatic channels expressed its regret to the French Indo China authorities and I learned from competent sources that reparations were made.

On this 25th day of May, 1947
at Tokyo.

Deponent: /S/ TERA I, Kunizo (seal)

I, YASUDA, Shigeo, 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 the same place

Witness: /S/ YASUDA, Shigeo (seal)

OATH

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

/S/ TERA I, Kunizo (seal)

Please refer to AOKI, Kazuo file.