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(24)

コロンビア地区  
ワシントン市  
SS

宣誓供述書

余、アメリカ合衆國豫備海軍中佐  
五六一三五號、ハーバート M. ハート (Herbert M. Hart) 氏、先づ  
法律ニ從ヒ宣誓シタル後、如ク供述スル。

余ハコロンビア地区、ワシントン、海軍省海軍法務局  
長ニモトシ現役勤務中デアル。

余ハコロンビア地区、ワシントン、國家戰艦局及  
海軍作戦局ヲ含ム多数海軍省各局トノ間、連絡將校  
アル。右ノ内海軍作戦局ハ海軍情報部ヲ包含スル。右  
連絡將校トシテ、余ノ公的資格ニ於テ、余ハ日本東京連合軍  
最高指揮官總司令部極東國際軍事裁判所、國際  
檢察部ヨリ極東國際軍事裁判所ニ既ニ證據トシテ、  
受理サレタル或種ノ書類及以下ニ挙ゲシタル他ノ書類ヲ  
審査シ且右凡テノ書類ニ記載サレタル事柄ニ関スル公的情報  
ヲ「アメリカ合衆國海軍」カラスルヨリ要求サレタ。前記要求  
ニ從ヒ、余ハ A 表、B 表及 C 表トシテ以下ニ引用セラレタル或種ノ  
書類ヲ作成スルニ當リ、アメリカ合衆國海軍省内各種ノ官  
憲ノ意見ヲ徴シ且「コロンビア」地区、ワシントン、海軍省  
艦船局、艦船統計課擔任ノ生産分析者、アルバート B.  
レイ氏 (Mr. Albert B. Ray) ト共ニ働イタ。

余ノ公的資格ニ於テ、余ハ右レイ氏 (Ray) 氏、既ニ作成セルソ

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書類ヲ審査シタカ、右ノ内一ツハ一九四七年一月二十三日附クテ  
辯護側書類第五九六號トテ提出セシ、法廷書證第三〇〇一  
號トシ證據トシテ受理セラレタ。他ノ書類ニ一九四七年四月三日附クテ  
辯護側書類第一五九七號トテ提出セシ、法廷書證第一  
三〇〇二號トテ證據トシテ受理セラレタ。余ハ「アメリカ合衆國海軍  
ニリ使用ナレ且前述法廷書證第三〇〇二號及第三〇〇三號ニ於テ  
引用セラレタ用語ノ定義ヲ十分ニ就知テ居ル」。

余ハ又一九四四年十月七日現在米日海軍保有艦艇比較表  
ト題スル辯護團側書類第一五七二號トテ提出セシ、法廷書  
證第三〇〇三—A號トテ證據トテ受理セラレタ書類ヲ審査  
シタ。余ハ又一九四一年十月七日現在建造中ノ米日艦艇比較  
表ト題スル辯護側書類第一五七三號トテ提出セシ、法廷書證  
第三〇〇三—B號トテ證據トテ受理セラレタ書類ヲ審査シタ。余  
ハ又一九四七年八月十五日附クテ辯護側書類第二〇八五號ト  
テ提出セシ、法廷書證第三〇〇三號トテ證據トテ受理セ  
レタ吉田英三ノ宣誓供述書ヲ審査シタ。余ハ又一九四七年八月二十  
二、二十五兩日附國際軍事裁判速記録ニ六六〇頁乃至二六六  
五〇頁ヲ審査シタ。

更ニ進ニテ余ハ一九四七年五月一日附吉田英三ニ依リ署名セラレタ  
ル書證第三〇〇三—A及第三〇〇三—Bノ證明書ヲ審査シタ。其  
ノ證明書ノ何レモ、以下ノ陳述カナサレタ。即チ「アメリカ合衆  
國艦艇及噸數ノ資料ハ「ゴロンビヤ」地巴、「ワシントン」、「アメリカ」合衆  
國海軍者ノ認證記録ヲ採リタ。余ハ上記圖表カ眞實且正確  
ナルコトヲ更ニ證明ス」。吉田氏ハ尙前述證明書中ニ於テ引用

サ、書證第三〇〇三—A 號及三〇〇三—B 號作成ニキリテ使用セリ  
 「アメリカ」合衆國海軍資料ハ「アメリカ」合衆國海軍艦艇関ス  
 ル「アメリカ」合衆國海軍有ノ或一部ノ公文書、……シカウ採シタニ  
 シテ書證オ三〇〇三—C 号及本裁判所ニ於テ記言中（二六六—六頁）ニ  
 於テ意味シテナル。吉田氏ハ彼ノ存チテナル「アメリカ」合衆國海  
 軍有ノ「認証記録」及「アメリカ」合衆國海軍有ノ公文書、本體  
 ヲ夫々明シキナリ。然シテ、若干ノ数字、類似ノ故ヲ以テ彼ハ法  
 廷書證オ三〇〇三—C 号及オ三〇〇三—D 号ヲ夫々引用シラモシナイ。吉田氏ハ  
 又書證オ三〇〇三—A 号及三〇〇三—B 号ニ於テ「アメリカ」合衆國海  
 軍ノ資料ヲ提出スニキリ彼ニヨリ使用サレテ専門語ノ意義ヲ其  
 証明書ヲ作成ス。此ノ証明書ハ一九四七年九月二十六日附テ「ア」本  
 書ニ添附サレタル。

書證第三〇〇三—A 号及第三〇〇三—B 号ハ彼ノ「比較表」ニ添  
 附サテ吉田氏ノ証明書ハ彼ノ「アメリカ」合衆國海軍有ノ記録  
 ヲ提出シテキルト述ヘテナルニトシ於テ正確ナリ。何故トシハ彼ハ  
 「アメリカ」合衆國海軍ノ資料ノ項目分類ニ提出シテナルカ、其  
 ノ項目分類ハ前述ノ書證オ三〇〇三—C 号及三〇〇三—D 号ニ於テ使  
 用サレ且トヘラレタル「アメリカ」合衆國海軍資料ノ項目、  
 分類別トハ異ナルトカ両書證及彼ノ陳述ニヨリ明チルカ  
 ナル。

「ライ」氏 (RAY) が用ヅク語ノ意味トハ異ナルヲ意味シ吉田氏が使用シテ語ハ次ノモウ含ムテイル。「保有量」ハ「建造中」其他「アタリカ」合衆國海軍者及「レイ」氏が書証第三〇一号及第三〇二号ヲ作成ニ當リテ使用ナク如キ語ノ定義我次ノ如クテイル。

**保有量。** 一、日保有。艦艇ハ造船所或ハ改造所ヲ完成シテモノトシテ海軍ニヨリ引取ラレタモノニシテ喪失スル高價却サレズ破壊セラルモノ等或ハ其他処分サレルモノカント考エラレク。此レハ艦装サス或ハ艦隊勤務ニ編入サレテイテ若干ノ艦艇ヲ含ムテイタ。又艦隊勤務用ニ當リテ本ナカラク海軍ニ所属艦艇及雜役船ヲモ含ムテイタ。

**建造中。** 一、日建造中。艦艇ハ海軍者か建造或ハ買上ケニ用シテ式ノ契約書ヲ發給シ或ハ契約ヲナレタ艦艇ニシテ海軍者ニ引取ラレタルモノカント考ヘラレク。此レハ契約中ノ艦艇ニシテ未カ海軍ニ引渡サレルモノモ又高議完了シテ契約書或ハ裁定書カ準備サレテイルモノヲモ含ムテイタ。艦艇ハ通常基礎工事或ハ改造カ完了シ政府供給次具材(機械兵器)ノ据附後ニシテ艦装及ハ艦隊勤務編入前ニ海軍ニ引取ラレシ。又艦隊勤務用ニ當リテ本ナカラク海軍ニ所属艦艇及雜役船ヲモ含ムテイタ。

**其他** 其他ノ艦艇ハ戦闘艦或ハハ艦艇トシテハ別ニサレタル總テノ艦艇ヲ含ム。

一九四七年九月二十六日附吉田大佐ノ説明書中ニ記載サレテイル日本海軍ニヨリテ使用サレタ如キ同一語ノ定義ハ

保有量 「特定期日或ハンス以前ニ完成シ引渡サレ艦籍

ニ編入セシ日本海軍ノ戦艦勤務ニ就ルノ概略準備成

ツタ艦艇ヲ意味スルヨリリス。昭示ト凡テノ場合一九四一年十二

月七日ノ保有ツ艦艇ハ既ニ就役シテイタノデアリス。

建造中。ノ新造艦艇ノ場合ニハ特定期日或ハンス以

前ニ艦艇改造作業カ始ツタコト即チ改造又ハ改装カ始

マツタコトヲ意味スルノデアリス。

其他 「主力艦、航空母艦、巡洋艦、駆逐艦、潜水艦ヲ

除キノ艦籍編入セテ凡テ艦艇ヲ含テ居リス。一九

四一年十二月七日 日本海軍ノ分類ノ其他ハ以下ノ型

ノ艦艇カラ成リ立ツテ居リス。即チ水上機母艦、潜水母艦

水雷敷設艦、掃海艇、海防艦、水雷艇、砲艦、駆逐艦

哨戒艇、海底電線敷設船及ヒ特務艦即チ練習艦

貨物船、海軍油槽船、破冰艦、標的艦、工作艦、給糧

船ヲアリニス。

書面ヲ三〇〇号及第三〇〇ニ号ハ上記ノ「アメリカ合衆國

海軍者ノ定義ニ依ル一九四一年十二月七日現在ノ「アメリカ合

衆國海軍ノ情勢カラテリス。

一九四一年十二月十一日附テ前記「アルバート・B・レイ」(ALBERT B. RAY)

氏ニヨリテ証明セテ「ソレノレ」A表「B表」「C表」ト記サテ

附表ハ日本海軍ノ定義ニヨル

一九四一年十二月七日現在ノ「アメリカ合衆國海軍ノ情勢カラテリス

是等前記「A」「B」「C」諸表ハ全部日本海軍ノ定義ヲ

使用シテ「ソノ海軍「アメリカ合衆國海軍」ト日本海軍トヲ区

表ニヨリ比較シテ、是等ノ記諸表ハ吉田氏ニヨリ述ベシ  
語、定義、分類ヲ使用シ是等ヲ「アメリカ」合衆國海軍情  
報部ニヨリ「海軍」トシ「アメリカ」合衆國海軍ノ數字ニ適用シ  
タトハ注目セラル

一九四一年十二月七日 現在未日海軍艦艇(保有量)ニ較表  
ナル表題ノウイテ上記 A 表ニ於テ日本ノ合計ハ「イ」氏  
書誌第三〇三号「A」カス、フ、マ、寫シタモノナル、然レテ  
ハ「アメリカ」合衆國ノ合計ハ吉田氏ハ日本側合計額決定  
ノ際ニ使用セルモト同意意義ノ「保有量」トイフ語ヲ使用  
スル時ニ必要ト変更ラ加ヘテ其ノ結果ノ変更ハ次ノ如クナル  
戦艦ハ十七隻又カラ十五隻ニ変更セラル。ソノ理由ハ「アメリカ」  
合衆國海軍ノ増強ニ從テ「完成」及「就役」トシテ書誌  
第三〇一号及「第三〇二号」ノ合計ニ合ミレイルニ隻ノ戰  
艦ハ一九四一年十二月七日ニハ「戦艦勤務ニ就ク準備」  
ハ未カキテ居ラズ「海軍」ハ未カシラ「作戰單位」トシテ  
如何ナル「アメリカ」合衆國艦隊ニモ配属サレナイカカラテ  
アル。

(2) 航空母艦ハ八隻カラ六隻ニ変更セラル、其ノ理由ハ「アメリカ」  
合衆國航空母艦ノ「艦」六隻ハ日本ノ航空母艦ノ保  
有量トシテ分類セラル「同一ノ意味」テ「保有量」即チ「完  
成」ト「就役」ト「艦隊」ノ作戰單位トシテ………  
航行機及乗組員ヲ必要トサレキル如ク整備シ「戦艦」  
勤務ニ就ク準備カチタルカラテアル。一九四一年九  
月二十六日附吉田ノ「証書」第三節第四節ヨリ引用)

一九四一年十二月七日ニハ「アメリカ」合衆國ハ艦力六隻ノ斯  
 稱ニ完成セシ艦裝カシ艦隊ニ配属セタ航空母艦ヲ有ス  
 イタ其ノ航空母艦ハ大西洋艦隊ノ「レンジャー」(RANGER)  
 「ヨークタウン」(YORKTOWN)「ワスプ」(WASP)及太平洋  
 艦隊「サラトガ」(SARATOGA)「レキシントン」(LEXINGTON)  
 「エンタープライズ」(ENTERPRISE)トシテ海軍情報部記録ヨリ  
 作成セタ別紙海軍文書第九九号ハ是等ノ合計ヲ記シ  
 又CV航空母艦「ホーネット」(HORNET)ハ一九四一年十月ニ  
 十日「就役」シタケレドモ一九四一年十二月二十三日(日本ノ空  
 母翔鳳カ日本側ノ言フ意味テ)「就役」(書誌第九一八号)  
 即チ「砲彈薬航空機及乗組員」ヲ必要トサレキル如ク整  
 備シ「戦闘勤務」ニ就クベク準備カナク「吉田ノ証書」  
 第四節ヨリ引用(翌日)迄ハソノ航空隊ヲ搭載シナカラ  
 タコトヲ指摘シキル

(次頁へ)

*[Faint bleed-through text from the reverse side of the page, including words like "Yorktown", "Enterprise", and "Hornet"]*



同海軍文書ハC V E / 護衛空母 / 「ロング・アイランド」ハ就役中  
 テアリタガ「戦闘航空母艦トシテハ分類サレズ」ト述ベテナル。  
 事實同艦ハ戦闘航空母艦テハ無ク「戦争中終始航空  
 機ノ輸送ニ使用サレタ。ソノ全航空機数ハV E / 戦闘機 /  
 六機トV S O / 偵察機 / 十機「アリタガ」前記ノ理由デ  
 C V / 航空母艦 / 「ホーネット」トC V E / 護衛空母 / 「ロング・アイ  
 ランド」ハ右A表ニ含まレズC表ニ含まレテナル。約言スルハC V  
 / 航空母艦 / 「ホーネット」モC V E / 護衛空母 / 「ロング・アイラ  
 ンド」モ一九四一年十二月七日迄ニハ「戦闘航空母艦トシテハ吉  
 田ノ証明書ノ用語ヲ用フレバ」...「航空機及乗組員ヲ以  
 要トサレテナル如ク整備シテキナカッタ。

(3) 重巡洋艦ト軽巡洋艦ノ数ニハ変更ナシ。

(4) アメリカ合衆國海軍ノ驅逐艦ト潜水艦ノ数ハ日本

側ノ合計額決定ニ際シ吉田氏カ用ヒタノト同意義ニスル  
 為、所要ノ箇所ニ於テハ減サシタ。

(5) 日本艦艇ノ「其他」ノ型ハ吉田ノ表、即チ書証第三。

〇三ノA号カラ変更ヲ加ヘズ寫サレタモノナル。一九四七年九月  
 ニ十六日附附屬證明書ニ於テ吉田カ定義シタ「其他」ナ  
 ル語ハ米國艦艇ニモ適用サレ、此ノ為数字ハ表示シテ  
 更サレタ。吉田氏ハ十七種ノ型ノ日本艦艇シ此ノ分類ニ入レ  
 テ表ヲ作ツタ。レイレ(カック)氏ハ斯卡ル型ノ米國艦艇、合計  
 ヲ記入シタ。注目スベキハ日本海軍ハ「其他」ナル語ニ病院  
 輸送船、海軍區所屬艦艇等ノ型ヲ包含スル等

「レイ」(Ray)氏ハ書証第三〇二号ニ於テ、通俗的ナ、專門的ニハナイ意味ヲ用ヒテナル。其ノ他ノナル項目ニ含ムル事ヲ示スル。

一九四一年十二月七日現在太平洋地域ニ於ケル艦隊(保有)ノ米日海軍艦艇比較表ト題スル右B表ニ於テハ、日本側合計額「レイ」(Ray)氏カ書証第三〇三ニトA表カラ変更加ヘズ其ノ儘寫シテモナル。然レ米國側合計額ハ海軍情報部作成ノ太平洋艦隊「レイ」艦隊公式「アメリカ合衆國海軍艦艇記録」ニ艦船局内「レイ」(Ray)氏ノ事務所ノ噸数記録カテ日本側合計額決定ニ際シ吉田氏カ用ヒタノト同意義ニ「保有量」ナル語ヲ用ヒテ「レイ」(Ray)氏カ算定シテモナル。

一九四一年十二月七日現在米日海軍建造中艦艇比較表ト題スル右C表ニ於テハ、日本側合計額ハ書証第三〇三ニ「B」カテ「レイ」(Ray)氏カ変更加ヘズ其ノ儘寫シテモナル。然レ米國側合計額ハ上記「アメリカ合衆國海軍記録」ニ吉田氏カ日本側合計額決定ノ際使用セル「建造中」ナル語ノ意義ニ改セシムル要アル為「レイ」(Ray)氏カ変更加ヘタ。「建造中」ナル語「レイ」(Ray)氏カ書証第三〇二号ニ第ニ第ニ号中ニ「艦艇ノ契約締結」ノ日カラソノ引渡シノ日迄ヲ含ムトシテ用ヒタ。吉田氏ノ言フ所ニ依ルハ此ノ言葉ヲ書証第三〇三「B」号中ニテ、新造艦艇、龍骨据附ノ日又ハ改造艦艇ノ改造(即チ

「改造又ハ改装」開始ノ日カラ艦艇カ完成シ建造者ヨリ  
艦長ヲ通シテ海軍大臣ニ引渡サレタ日迄ノ期間ヲ含  
ムモノトシテ使用シタ由キアル。

更ニ右ニ表ニ付述ベレバ、建造中ニナル艦ヲ日本式ニ使  
用セル結果左記ノ変更ヲ生ジタ。

(1) 戦艦 (変更ナシ) 合計十隻、之ハ一九四一年十二月七日  
以前ニ龍骨カ据附ケラレタカ同日以前ニ「戦闘勤務」ニ  
就クベク準備ノ成レラカワタモノノ数ニアル。

(2) 航空母艦 合計十隻、之ハ一九四一年十二月七日以前  
ニ龍骨カ据附ケラレタカ同日以前ニ「戦闘勤務」ニ就クベク  
準備ノ成ルニ至ラカワタ (新造又ハ未改造) モノ即チ CV  
航空母艦「ホーネット」(HORNET)、「エセックス」(ESSEX)

「ヨークタウン」(YORK TOWN)、「イントレピッド」(INTREPID)  
「レキシントン」(LEXINGTON)、「バンカー・ヒル」(BANKER HILL)  
「インディペンデンス」(INDEPENDENCE)、「プリンストン」(PRINCETON)  
「ロー・ウッダー」(LEAHU WOOD) 及「カウペンズ」(COWPENS)  
ノ数ニアル。

(3) 大型巡洋艦、重巡洋艦、及軽巡洋艦ノ数ハ書  
證第三〇〇一号、第三〇〇二号及第三〇〇三号B号ノ舉  
ゲテナル夫々三隻、八隻、三十一隻カラ、吉田氏カ日本側  
合計額決定ノ際使用セルモノト同意義ニスルガ、右ニ  
表ニテハ夫々〇隻、四隻、十八隻ニ減ジテナル。

(4) 駆逐艦、潜水艦ノ数モ亦、書證第三〇〇一号、第三  
〇〇二号、第三〇〇三号B号ニ舉ゲテナル夫々三〇六隻ト九

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六隻カウ、古田氏が日本側合計額決定ノ際使用セルモノ  
ト同意義ニスル為、右C表ニ於テハ夫々八八隻ト三八隻  
ニ減ジテナル。

ハーバート、M、ハートノ署名

コロンビア地区、華府ニ於テ一九四一年十二月二十九日、  
余ノ面前ニテ署名ハ宣誓セリ。

米國海軍中佐

ジョセフ、O、フリントノ署名

DISTRICT OF COLUMBIA )  
 ) ss  
 CITY OF WASHINGTON )

AFFIDAVIT

I, Herbert M. Hart, Commander, U.S. Naval Reserve, 56135, being first duly sworn according to law do depose and say:

That I am on active duty with the Judge Advocate General of the Navy, Navy Department, Washington, D.C.

That I am Liaison Officer between the National War Crimes Office, Washington, D.C., and the various bureaus of the Navy Department, including the Bureau of Ships and the Bureau of Naval operations, the latter of which includes the Office of Naval Intelligence. In my official capacity as such Liaison Officer I was requested by the International Prosecution Section of the International Military Tribunal for the Far East, General Headquarters, Supreme Commander for the Allied Powers, Tokyo, Japan, to examine certain documents heretofore admitted in evidence in the International Military Tribunal for the Far East, as well as other documents hereinafter mentioned, and to obtain from the U.S. Navy official information regarding matters mentioned in all such documents. In compliance with said request, I consulted with various officials in the U.S. Navy Department and worked with Mr. Albert B. Hall, Production Analyst in Charge of the Ships Statistics Section of the Bureau of Ships, Navy Department, Washington, D.C., in the preparation of certain documents referred to herein below as Table A, Table B and Table C.

In my official capacity I examined two documents, previously prepared by the said Mr. Hall, one of which documents, dated 23 January 1947, was introduced as Defense Document No. 1596 and admitted in evidence as Court Exhibit #3001. The other document, dated 3 April 1947, was introduced as Defense Document No. 1597 and admitted in evidence as Court Exhibit #3002. I am thoroughly familiar with the definitions of the terms used by the United States Navy and referred to in said Exhibits 3001 and 3002.

I examined also the document introduced as Defense Document #1572, admitted in evidence as Exhibit #3003-A, entitled "Comparative Table of Naval Vessels On Hand Between the U.S.A. and Japan as of December 7, 1941". I also

examined the document introduced as Defense Document #1573, admitted in evidence as Exhibit #3003-B, entitled "Comparative Table of Vessels Under Construction Between the U.S.A. and Japan as of December 7, 1941". I examined also the affidavit of Hidemi YOSHIDA, dated 15 August 1947, introduced as Defense Document #2085, and admitted in evidence as Exhibit #3003. I examined also the Transcript of the Record, International Military Tribunal for the Far East, pages 26,610 to 26,650, dated 22 and 25 August 1947.

Further, I examined the certificates on the Exhibits #3003-A and #3003-B, signed by Hidemi YOSHIDA, dated 1 May 1947, in each of which certificate the following statement is made: "The data of the U.S. vessels and tonnage were taken from certified records of the U.S. Navy Department in Washington, D.C., I further certify the above chart is true and accurate." Mr. YOSHIDA further infers, in Exhibit 3003 and in testimony before this Tribunal (page 26,616) that the U.S. Navy data referred to in the foregoing certificates as used by him in preparing Exhibits 3003-A and 3003-B was taken from "a copy of an official document of the United States Navy Department pertaining to the vessels of the United States Navy..." Mr. YOSHIDA does not identify the "certified records of the U.S. Navy Department" nor the "official document of the United States Navy Department", respectively, which he mentions. However, because of the similarity of some figures, it is possible that he referred to Court Exhibit #3001 and #3002, respectively. Mr. YOSHIDA also has prepared a certificate showing the meanings of technical terms as used by him in presenting the U.S. Navy data in Exhibits 3003-A and 3003-B. This certificate, dated 26 September 1947, is attached hereto.

The certificates of Mr. YOSHIDA as attached to his "Comparative Tables", Exhibits 3003-A and 3003-B, are not accurate in stating that he is presenting records of the U.S. Navy Department, because he presents the U.S. Navy data under headings and classifications which are shown by the exhibits and by his statements to be different from the headings and classifications of the U.S. Navy data, as used and furnished in said Exhibits 3001 and 3002.

The terms used by Mr. YOSHIDA with a meaning different from the meaning in which those terms were used by Mr. Ray include the following: "On Hand", "Under Construction" and "Miscellaneous". The definitions of those terms, as used by the United States Navy Department and as used by Mr. Ray, in preparing Exhibits 3001 and 3002 are as follows:

ON HAND: "Vessels "On Hand" were considered those vessels accepted by the Navy as complete from the building or conversion yard but not lost, sold, destroyed, etc., or otherwise disposed of. This included some vessels which had not been fitted out or reported for Fleet duty. Also included were District and Service Craft not intended for Fleet duty."

UNDER CONSTRUCTION: "Vessels "Under Construction" were considered those vessels for which the Navy Department had placed a formal contract or made obligations concerning construction or procurement but which vessels had not been accepted by the Navy Department. This includes vessels under contract not yet delivered to the Navy as well as vessels on which negotiations had been completed and contract or award was under preparation. Vessels are usually accepted by the Navy after completion of basic construction or conversion and installation of Government furnished material (machinery and ordnance) but before outfitting and reporting for Fleet duty. Also included were District and Service Craft not intended for Fleet duty."

MISCELLANEOUS: "Miscellaneous vessels included all craft not classified as combatant ships or as small boats."

The definitions of those same terms, as used by the Japanese Navy, as stated in the certificate of Captain YOSHIDA, dated 26 September 1947, are:

ON HAND: "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 December 1941 had already been commissioned."

UNDER CONSTRUCTION: "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."

MISCELLANEOUS: "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, subchasers, patrol boats, cable layers, and special service ships, namely, training ships, cargo ships, Navy tankers, ice breakers, target ships, repair ships, and provision ships."

Exhibits 3001 and 3002 showed the status of the ships of the U.S. Navy as of 7 December 1941 under the U.S. Navy Department definitions as given above.

Additional tables, marked "Table A", "Table B" and "Table C", respectively certified to by the said Mr. Albert B. Ray, under date of 11 December 1941, show the status of the ships of the U.S. Navy as of 7 December 1941, under the Japanese Navy definitions. These said tables, "A", "B" and "C", also make a graphic comparison between the two navies, that of the United States and that of Japan, using the Japanese Navy definitions throughout. It will be noted that these said tables used the terms, definitions and classifications as stated by Mr. YOSHIDA and applied them to the U.S. Navy Department figures as prepared by the U.S. Navy, Office of Naval Intelligence.

In said Table A, entitled "Comparative Table of Naval Vessels (On Hand) Between the U.S.A. and Japan as of 7 December 1941", Japanese totals were merely copied by Mr. Ray without change from Exhibit 3003-A. The U.S. totals, however, were changed by him as required when using the term "On Hand" with the same meaning as that used by Mr. YOSHIDA in his determination of the Japanese totals. The resulting changes are as follows:

(1) Battleships, changed from 17 to 15 because 2 battleships which had been included in the totals in Exhibits 3001 and 3002, as "Completed" and "Commissioned" under the U.S. Navy practice, were not yet "Ready for Operational Service" on 7 December 1941, and they had not yet been assigned to any U.S. Fleet as an "operating unit" thereof.

(2) Aircraft carriers, changed from 8 to 6, because only 6 U.S. carriers were "On Hand" in the same sense as the Japanese carriers were classed "On Hand", namely "Completed" and "Commissioned", "ready for operational service, equipped as required with guns, ammunition, planes and operating personnel . . . as an operating unit of the Fleet". (Quotations from YOSHIDA's certificate dated 26 September 1947, paragraphs 3 and 4). On 7 December 1941, the U.S. had only 6 carriers so completed and equipped and assigned to fleets. Those carriers were RANGER, YORKTOWN and W/SP in the Atlantic Fleet, and SARATOGA, LEXINGTON and ENTERPRISE in the Pacific Fleet. Navy Document #99, from ONI Records, copy attached, states these totals and also points out that CV HORNET, although commissioned on 20 October 1941, did not have her air group embarked until 23 December 1941, (the day after the Japanese CV SHOHO was "Commissioned" (Exhibit 918) in the Japanese meaning of that term, namely, "ready for operational service, equipped as required with guns, ammunition, planes and operating personnel".



(Quotation from YOSHIDA's certificate, paragraph 4). The same Navy document states that the CVE LONG ISLAND was in commission "but is not classed as a combat carrier". Actually she was not a combat carrier but "was used throughout the war for transporting planes. Her air complement consisted of 6 VF's and 10 VSO's". For the foregoing reasons the CV HORNET and CVE LONG ISLAND are not included in said Table A but are included in Table C. Briefly, neither CV HORNET nor CVE LONG ISLAND had been, using the terms from YOSHIDA's certificate, "equipped as required with . . . planes and operating personnel" as combat carriers on or before 7 December 1941.

(3) The figures for heavy and light cruisers did not change.

(4) The figures for destroyers and submarines of the U.S. Navy were reduced where required by application of the same meaning as that used by Mr. YOSHIDA in his determination of the Japanese totals.

(5) "Miscellaneous" types of Japanese vessels were copied without change from YOSHIDA's table, Exhibit 3003-A. The term "Miscellaneous" as defined by YOSHIDA in his attached certificate, dated 26 September 1947, was applied to U.S. Naval vessels thereby changing the figures as indicated. Mr. YOSHIDA lists 17 types of Japanese ships falling into this category. Mr. Ray entered the totals for the U.S. ships of those types. It is observed that the Japanese Navy does not include under the term "Miscellaneous" any hospital ships, transports, district craft and other types which were included by Mr. Ray in Exhibit 3002 under the heading "Miscellaneous", which he used in a general, non-technical sense.

In said Table B, entitled "Comparative Table of Naval Vessels (On Hand) in Fleets in Pacific Area Between the U.S.A. and Japan as of 7 December 1941", the Japanese totals were merely copied by Mr. Ray without change from Exhibit 3003-A. The U.S. totals, however, have been computed by Mr. Ray from official U.S. Naval records of ships of the Pacific Fleet and Asiatic Fleet, as prepared by the Office of Naval Intelligence and from tonnage records in Mr. Ray's office in the Bureau of Ships, and applying the term "On Hand" in the same sense as that used by Mr. YOSHIDA in determining the Japanese totals.

In said Table C, entitled "Comparative Table of Naval Vessels Under Construction Between the U.S.A. and Japan as of 7 December 1941", the Japanese totals were merely copied by Mr. Ray without change from Exhibit 3003-B. The United States totals, however, were changed by him as required to conform to

U.S. Naval records hereinbefore referred to and the meaning of the term "Under Construction" used by Mr. YOSHIDA in determining the Japanese totals. The term "Under Construction" had been used by Mr. Ray in Exhibits 3001 and 3002 to cover the period from the date of the contract of the vessel to the date of its delivery. The term, according to Mr. YOSHIDA, was used by him in Exhibit 3003-B to cover the period from the date of laying the keel of a new vessel or the commencement of conversion(i.e., "reconstruction or re-equipment"), of a converted vessel until the vessel "had been completed and had been delivered by the builder to the Navy Minister through the Captain of the vessel".

In further reference to said Table C: Applying the Japanese use of the term "Under Construction" to the United States vessels, the following changes resulted:

(1) Battleships; (no change) total 10, the number for which the keel had been laid before 7 December 1941 and which had not been "ready for operational service" before that date.

(2) Aircraft Carriers; total 10, the number (new or not converted) for which the keel had been laid before 7 December 1941, but which had not been "ready for operational service" before that date, namely: CV HORNET, ESSEX, YORKTOWN INTREPID, LEXINGTON, BUNKER HILL, INDEPENDENCE, PRINCETON, BELLEAU WOOD, and COWPENS.

(3) The figure for large cruisers, heavy cruisers and light cruisers were reduced from 3, 8 and 31, respectively, as given in Exhibits 3001, 3002 and 3003-B to 0, 4 and 18, respectively, in said Table C as required by application of the same meaning as that used by Mr. YOSHIDA in his determination of the Japanese totals.

(4) The figures for destroyers and submarines were also reduced from 206 and 96, respectively, as given in Exhibits 3001, 3002 and 3003-B, to 88 and 38, respectively, in said Table C as required by application of the same meaning as that used by Mr. YOSHIDA in his determination of the Japanese totals.

/s/ Herbert M. Hart  
HERBERT M. HART

Subscribed and sworn to before me this 29th day of December 1947, at Washington, D.C.

Commander, USN /s/ Joseph O. Collins

(From ONI Records - Pacific Fleet and Atlantic Fleet Conf. notices, 1941. Log of USS HORNET, December, 1941)

UNITED STATES FLEET: CARRIERS AND AIR COMPLEMENTS AS OF 7 DECEMBER 1941

|   | <u>VSB</u> | <u>VIB</u> | <u>VF</u>  | <u>VM</u> | <u>VSO</u> | <u>VJ</u> | <u>TOTALS</u> |
|---|------------|------------|------------|-----------|------------|-----------|---------------|
| <u>I. ATLANTIC FLEET</u>  |            |            |            |           |            |           |               |
| CV RANGER (Norfolk, Va.)  | 31         | 6          | 36         | 4         | 3          | 2         | 82            |
| CV YORKTOWN (Atlantic Coast)  | 19         | 18         | 27         | 3         | 3          | 2         | 72            |
| CV W. SP (Atlantic Coast)<br>(Same complement as CV Yorktown)           | <u>19</u>  | <u>18</u>  | <u>27</u>  | <u>3</u>  | <u>3</u>   | <u>2</u>  | <u>72</u>     |
| <u>TOTAL ATLANTIC FLEET</u>   | <u>69</u>  | <u>42</u>  | <u>90</u>  | <u>10</u> | <u>9</u>   | <u>6</u>  | <u>226</u>    |
| <u>II. PACIFIC FLEET</u>  |            |            |            |           |            |           |               |
| CV SARATOGA (West Coast)  | 43         | 12         | 27         | 3         | 3          | 2         | 90            |
| CV LEXINGTON (West of Pearl Harbor)<br>(Same complement as CV Saratoga) | 43         | 12         | 27         | 3         | 3          | 2         | 90            |
| CV ENTERPRISE (West of Pearl Harbor)                                    | <u>37</u>  | <u>18</u>  | <u>27</u>  | <u>3</u>  | <u>3</u>   | <u>2</u>  | <u>90</u>     |
| <u>TOTAL PACIFIC FLEET</u>  | <u>123</u> | <u>42</u>  | <u>81</u>  | <u>9</u>  | <u>9</u>   | <u>6</u>  | <u>270</u>    |
| <u>*TOTAL ATLANTIC and PACIFIC FLEETS</u>                               | <u>192</u> | <u>84</u>  | <u>171</u> | <u>19</u> | <u>18</u>  | <u>12</u> | <u>496</u>    |

\*Notes: 1) CV HORNET (Norfolk, Va.) was commissioned on 20 October 1941. Her air group which had the same composition as that of CV YORKTOWN, however, was not embarked until 23 December.

2) CVE LONG ISLAND (Atlantic Coast) was in commission, but is not classed as a combat carrier. She was used throughout the war for transporting planes. Her air complement consisted of 6 VF and 10 VSO.

I. P. S. Doc. No. 3351 - Chart

(海軍情報部記録ヨリ——太平洋艦隊及大西洋艦隊会議報告 一九四一年 USS「ホーネット」  
航海日誌 一九四一年十一月)

「アメリカ合衆国艦隊：一九四一年十一月七日現在航空母艦及其飛行機数」

|                                    | VSB<br>/哨戒爆撃機/ | VTB<br>/雷撃機/ | VF<br>/戦闘機/ | VM<br>/雑役機/ | VSO<br>/偵察機/ | VJ<br>/補助機/ | 計   |
|------------------------------------|----------------|--------------|-------------|-------------|--------------|-------------|-----|
| I. 大西洋艦隊                           |                |              |             |             |              |             |     |
| CV/航空母艦/「エニジヤ」(「フオ-2,「ワ-ゲ=2」)      | 31             | 6            | 36          | 4           | 3            | 2           | 82  |
| CV/「ヨークタウン」(大西洋岸)                  | 19             | 18           | 27          | 3           | 3            | 2           | 72  |
| CV/「ワースプ」(大西洋岸)<br>(CV「ヨークタウン」同機数) | 19             | 18           | 27          | 3           | 3            | 2           | 72  |
| 計 大西洋艦隊                            | 69             | 42           | 90          | 10          | 9            | 6           | 226 |
| II. 太平洋艦隊                          |                |              |             |             |              |             |     |
| CV「サラトガ」(西岸)                       | 43             | 12           | 27          | 3           | 3            | 2           | 90  |
| CV「レキシントン」(真珠湾西部)<br>(CV「サラトガ」同機数) | 43             | 12           | 27          | 3           | 3            | 2           | 90  |
| CV「エンタプライズ」(真珠湾西部)                 | 37             | 18           | 27          | 3           | 3            | 2           | 90  |
| 計 太平洋艦隊                            | 123            | 42           | 81          | 9           | 9            | 6           | 270 |
| * 総計 大西洋及太平洋艦隊                     | 192            | 84           | 171         | 19          | 18           | 12          | 496 |

米註 1) CV「ホーネット」(「フオ-2,「ワ-ゲ=2」)ハ一九四一年十月二十日就役シ。然シテCV「ヨークタウン」同シ構成員ヲ有シ。其  
飛行隊ハ十一月二十三日マテ搭載サレナカ。タ。  
2) CVE/護衛空母/「ロングアイランド」(大西洋岸)ハ就役中デアツカ。戦闘航空母艦トシテ区分サレナカ。タ。同艦ハ戦争中、  
航空機輸送ニ用ケラシ。同艦ノ飛行機数ハVF/戦闘機/大機及VSO/偵察機/十機カラ成、テキ。

海軍文書第九九号  
原本

I. P. S. FILE UNIT

DATE: 20 Jan 1948

I. P. S. Evidentiary Document Number 3351

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

Signature: H Haino  
For Clerk of Court

CHARGE OUT SLIP

Date: 29 Jan 1948

EVIDENTIARY DOC. NO. 3351

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

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

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

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

PRESSTRANS \_\_\_\_\_

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

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

Signature Robinson

Room # 372

INTERNATIONAL PROSECUTION SECTION

Doc. No. 3351

28 Jan 1948

ANALYSIS OF DOCUMENTARY EVIDENCE

DESCRIPTION OF ATTACHED DOCUMENT

Title and Nature: Affidavit of Commander Herbert M. Hart

Date: 29 Dec 1947 Original (x) Copy ( ) Language: English

Has it been translated? Yes (x) No ( )

LOCATION OF ORIGINAL

IPS Document Division

SOURCE OF ORIGINAL: Sworn affidavit

PERSONS IMPLICATED: None

CRIMES TO WHICH DOCUMENT APPLICABLE: None

SUMMARY OF RELEVANT POINTS

Affidavit defines terms and clarifies meaning in Court Exhibits 3001-2 (Defense Document 1596, 1597), Exhibit 3003-A-B (Defense Document 1572-3), Exhibit 3003 (Defense Document 2085), and Transcript of the Record pp 26,610 - 26,650.

Analyst: JAMES HOYT

Doc. No. 3351

(From ONI Records - Pacific Fleet and Atlantic Fleet Conf. notices, 1941. Log of USS HORNET, December, 1941)

UNITED STATES FLEET: CARRIERS AND AIR COMPLEMENTS AS OF 7 DECEMBER 1941

|   | <u>VSB</u> | <u>VFB</u> | <u>VF</u>  | <u>VM</u> | <u>VSO</u> | <u>VJ</u> | <u>TOTALS</u> |
|---|------------|------------|------------|-----------|------------|-----------|---------------|
| <b>I. ATLANTIC FLEET</b>  |            |            |            |           |            |           |               |
| CV RANGER (Norfolk, Va.)  | 31         | 6          | 26         | 4         | 3          | 2         | 82            |
| CV YORKTOWN (Atlantic Coast)  | 19         | 18         | 27         | 3         | 3          | 2         | 72            |
| CV WASP (Atlantic Coast)<br>(Same complement as CV Yorktown)            | <u>19</u>  | <u>18</u>  | <u>27</u>  | <u>3</u>  | <u>3</u>   | <u>2</u>  | <u>72</u>     |
| <u>TOTAL ATLANTIC FLEET</u>   | <u>69</u>  | <u>42</u>  | <u>80</u>  | <u>10</u> | <u>9</u>   | <u>6</u>  | <u>226</u>    |
| <b>II. PACIFIC FLEET</b>  |            |            |            |           |            |           |               |
| CV SARATOGA (West Coast)  | 43         | 12         | 27         | 3         | 3          | 2         | 90            |
| CV LEXINGTON (West of Pearl Harbor)<br>(Same complement as CV Saratoga) | 43         | 12         | 27         | 3         | 3          | 2         | 90            |
| CV ENTERPRISE (West of Pearl Harbor)                                    | <u>37</u>  | <u>18</u>  | <u>27</u>  | <u>3</u>  | <u>3</u>   | <u>2</u>  | <u>90</u>     |
| <u>TOTAL PACIFIC FLEET</u>  | <u>123</u> | <u>42</u>  | <u>81</u>  | <u>9</u>  | <u>9</u>   | <u>6</u>  | <u>270</u>    |
| <u>TOTAL ATLANTIC AND PACIFIC FLEETS</u>                                | <u>192</u> | <u>84</u>  | <u>171</u> | <u>19</u> | <u>18</u>  | <u>12</u> | <u>496</u>    |

\*Notes: 1) CV HORNET (Norfolk, Va.) was commissioned on 20 October 1941. Her air group which had the same composition as that of CV YORKTOWN, however, was not embarked until 23 December.

2) CVE LONG ISLAND (Atlantic Coast) was in commission, but is not classed as a combat carrier. She was used throughout the war for transporting planes. Her air complement consisted of 6 VF and 10 VSO.



(海軍情報部記録ヨリ——太平洋艦隊及大西洋艦隊會議報告,一九四一年。USS「ホーネット」航海日誌,一九四一年十二月。)

「アメリカ」合衆國艦隊:一九四一年十二月七日現在。航空母艦及其飛行機数。

|                                    | VSB<br>/哨戒爆撃機/ | VTB<br>/雷撃機/ | VF<br>/戦闘機/ | VM<br>/雑役機/ | VSO<br>/偵察機/ | VJ<br>/補助機/ | 計。         |
|------------------------------------|----------------|--------------|-------------|-------------|--------------|-------------|------------|
| I. 大西洋艦隊                           |                |              |             |             |              |             |            |
| CV/航空母艦/「レンジャー」(「リーフホーク」,「ウァーゲニア」) | 31             | 66           | 36          | 4           | 3            | 2           | 82         |
| CV「ヨークタウン」(大西洋岸)                   | 19             | 18           | 27          | 3           | 3            | 2           | 72         |
| CV「ワースポ」(大西洋岸)<br>(CV「ヨークタウン」ト同機数) | 19             | 18           | 27          | 3           | 3            | 2           | 72         |
| 計。大西洋艦隊                            | <u>69</u>      | <u>42</u>    | <u>90</u>   | <u>10</u>   | <u>9</u>     | <u>6</u>    | <u>226</u> |
| II. 太平洋艦隊                          |                |              |             |             |              |             |            |
| CV「サトカ」(西岸)                        | 43             | 12           | 27          | 3           | 3            | 2           | 90         |
| CV「レキシントン」(真珠湾西部)<br>(CV「サトカ」ト同機数) | 43             | 12           | 27          | 3           | 3            | 2           | 90         |
| CV「エンタプライズ」(真珠湾西部)                 | 37             | 18           | 27          | 3           | 3            | 2           | 90         |
| 計。太平洋艦隊                            | <u>123</u>     | <u>42</u>    | <u>81</u>   | <u>9</u>    | <u>9</u>     | <u>6</u>    | <u>270</u> |
| * 總計。大西洋及太平洋艦隊                     | <u>192</u>     | <u>84</u>    | <u>171</u>  | <u>19</u>   | <u>18</u>    | <u>12</u>   | <u>496</u> |

- \* 註。
- 1) CV「ホーネット」(「リーフホーク」,「ウァーゲニア」)ハ一九四一年十月二十日就役シ。然レモ CV「ヨークタウン」ト同シ構成員ヲ有シ其、飛行隊ハ十二月二十三日マデ搭載サレナカツタ。
  - 2) CVE/護衛空母/「ロングアイランド」<sup>(大西洋岸)</sup>ハ就役中デ「サトカ」, 戦闘航空母艦トシテ区分サレナカツタ。同艦ハ戰爭中、航空機輸送ニ用ヒラレタ。同艦ノ飛行機数ハ VF/戦闘機/大機及 VSO/偵察機/十機カラ成ツテナシ。

海軍文書カ九九号

● 原本