

EXHIBIT

Def. Doc. # 1935

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 : SEMBA, Tsutomu

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.

I, SEMBA, Tsutomu, was born in Tokyo on February 2, 1909, graduated from the college of engineering of the Tokyo Imperial University in March, 1933 and immediately entered the service of the Military Arsenal at Osaka. I was in the service of the Engineering Administration Section of the Maintenance Bureau of the War Ministry from March, 1939 to October, 1942, and of the General Bureau of Aerial Ordnance of the Munitions Ministry from March, 1944 to the end of the war. Meanwhile I was commissioned as technical major-colonel in April, 1942.

The case of the employment of POW's, relating to Exhibit 1970 A, "Inquiry about the utilization of the Manchurian Machine Tool Company for the purpose of urgent aerial maintenance," occurred at the time when I was in the service of the Maintenance Bureau, and it was directly

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in my charge.

While in the service of the Munitions Ministry, too, I undertook to give an indirect guidance and assistance to the above-mentioned Manchurian Machine Tool Company, so far as its materials etc. were concerned.

The note concerning the employment of POWs in the Manchurian Machine Tool Company was issued under the name of the Vice-minister, as entrusted according to the "Note Concerning the Disposal of POWs at the Present," (EX. 19654) decided by the War Minister on May 2, 1942.

At that time, owing to the extreme shortage of our domestic manpower, especially of technicians and skilled workers, all our people were obliged to work according to their talent and speciality, without distinction of age and sex. So the Minister's policy was to engage the prisoners in the sort and extent of labor permissible by international laws and regulations.

As regards the conditions of the demand and supply of machine tools at that time, our domestic productivity was 40,000 pieces (about ¥400 million) per year, while the total amount ordered was more than 250,000 pieces (about ¥2.5 billion). In addition, owing to the stringency of building materials, it was so difficult to build a new factory that there remained no alternative but to make the most of existing facilities. In consequence, we learned to utilize wholly and speedily the Manchurian Machine Tool Company which had a lot of

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The employment of POW's in the production of machine tools was the same as that in the basic industries belonging to the other groups of productive expansion, such as machinery, iron and steel, coal, light and non-iron metals, and cement industries, and it was quite different from that in such labor relating directly to the operational movement as the production and transport of arms and ammunition and the transport of materials to the fighting units. This is the reason why we decided to employ them, and it was in conformity to the Minister's intention up to that time.

We could never employ the prisoners in the production of arms and ammunition as well as other labor relating directly to the operational movement, for it not only might raise a question on international laws, but also constitute a grave issue in the protection of the military secrets. The Army had absolutely no intention of engaging the Manchurian Machine Tool Company in the direct production of arms, and it remained in the position of requisitioning and assisting the company as a requisitioner of machine tools. So the company was kept strictly

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distinct from the munitions industry under the direct guidance of the Army. This company was under the jurisdiction of the Engineering Agency of the Manchurian Economic Department.. The prisoners participated in the production of desk-lathes and automatic lathes in the type of German Index.

The wording of "urgent aerial maintenance" in the "Note of Utilizing the Manchurian Machine Tool Company for the Purpose of Urgent Aerial Maintenance", which was drafted by me was used with the intention of engaging the company in the speedy production of machine tools, thereby contributing indirectly to the inquired increase in production of aircrafts.

We did not project and carry out the direct production of arms and ammunition.

On this 18th day of July, 1947
at Tokyo.

DEPONENT /S/ SEHA, Tsutaru (seal)

I, SHIOBARA, Tokisaburo, 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/ SHIOBARA, Tokisaburo (seal)
ABE, Akira (seal)

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OATH

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

/S/ SEMBA, Tautoru (seal)

EXHIBIT

極東國際軍事裁判所

亞米利加合衆國 其他

對

荒木貞夫 其他

宣誓 供述 書

供述者 仙波

勉

自分機我國ニ行ハルル方式ニ從ヒ先ツ別紙ノ通り宣誓ヲ爲シタル上
次ノ如ク供述致シマス

一、私仙波勉ハ明治四三年二月二日東京都ニ生レ一九三三年三月東京帝國大學工學部ヲ卒業直ニ陸軍造兵廠大坂工廠ニ就職シ一九三九年三月ヨリ一九四二年十月マデ陸軍省整備局工政課ニ勤務シマシタ。一九四四年三月ヨリ終戦マデ軍需省航空兵器總局ニ勤務シマシタ。其ノ間一九四二年四月陸軍技術少佐ニ任ゼラレマシタ。

法廷證一九七〇號Aニヨル「滿洲工作機械株式會社ヲ航空緊急整備ノタメ利用致慶件照會」ニ關連スル俘虜使用ノ件ハ私ガ整備局在職當時發生シタモノデ私ハ本件ニ關スル直接ノ擔當者デアリマシタ。

又軍需省在職當時モ右ノ滿洲工作機械株式會社ニ對シ資材ソノ他ニ就キ間接ニ指導、援助ヲ行ヒ來ツタモノデアリマス。

「滿洲工作機械株式會社ニ俘虜ヲ使用スル件ハ一九四二年五月二日陸軍大臣ノ決裁セル」現在ノ俘虜處理ニ關スル件」(法廷證一九六五號A)ニ基キ委任事項トシテ次官名義ニテ出サレタモノデアリマス

一當時ハ國內ノ勞務特ニ技術者熟練工極メテ不足シ老幼男女ヲ問ハス夫々ノ能力特技ニ應シ全國民ガ勞務ノ部署ニツカネバナラヌ情勢ニア

アリマシタ。從ツテ俘虜ニ國際法規ニ基キ許容サレル種類、程度ノ勞務ニ服セシム大臣ノ方針アリマシタ。

一、當時工作機械ノ需要甚況ハ國內生産力年産四万臺（約四億圓）ニ對シテ窮屈テ新規工場増設ハ困難デアツタノデ既存設備ノ全面的利用ヲ企圖スル外ハアリマセンデシタ。

之ガ爲多數ノ優秀設備チ有シナガラ然モ殆ド遊休状態ニアツタ滿洲工作機械株式會社チ急速ニ全面的ニ活用スルコトトナリマシタ。然ルニ滿洲デハ當時内地以上ニ勞務逼迫シ、特ニ頭腦勞働、熟練勞働ニ就テハコノ傾向ガ顯著デアリマシタ。尙滿人勞務者ハ一般ニ技術水準低ク且出勤率不良ナル上ニ移動極メテ頻繁デ多ク期待シ得ス又内地人勞務者ノ滿洲移住モ幾多ノ難點ガアツタノデ結局俘虜中機械關係ノ技術經驗チ有スルモノチ選抜使用スル計畫チシマシタ。

一、俘虜チ工作機械製作ニ使用スルコトハ産業機械、鐵鋼、石炭、輕金屬

非鐵金屬、セメント工業ノ如キ他ノ生産力擴充、部内ニ屬スル基礎産業ニ使用スルト同様ゾアツテ俘虜ヲ兵器彈藥ノ製造及運搬並戰鬪部隊ニ宛テラレタ材料ノ運搬ノ如キ直接作戰行動ニ關係アル勞役ニ使用スルコトトハ全く趣ヲ異ニスル故ニ使用スルコトニシタモノテアリマシテ從來ノ大臣ノ意圖ニ基クモノデアリマシタ。

俘虜ヲ兵器ノ製造其他直接作戰行動ニ關係アル勞務ニ使用スルコトハ國際法上ノ問題ヲ惹起スルハ勿論軍機保護上由々シキ問題テ到底カ、ルコトハ爲シ得ナカツタノデアリマス。

滿洲工作機械株式會社ニ對シテハ軍トシテ直接兵器ノ生産ヲ企圖シタコトハ絕對ニナク單ニ工作機械ノ需要者トシテ要望支援スル立場ニアリマシタ從ツテ軍ノ直接指導スル兵器工業トハ劃然區別セラレテイマシタ。コノ會社ハ滿洲國經濟部工務司ノ所管ニ屬シテイマシタ。俘虜ハ卓上旋盤、(ベントレーズ)、ジャーマン、インデックス型自動旋盤ノ製作ニ關與シマシタ。

一、私ノ起案シタ法廷證一九六〇號A「滿洲工作機械株式會社ヲ航空緊急整

「ノ語句ハ同社ヲシテ工作機械ノ急速生産ヲ行ハシメ之ニ依リ間接ニ
航空機ノ増産ニ寄與セシメントシタモノデアリマス
兵器ノ直接生産ヲ計劃シ之ヲ實行シタモノデアリマセン、

昭和二十二年（一九四七年）七月十八日 於

東京都中央区槇町三ノ一
中央商區

供述者

仙波勉

右ハ當立會人ノ面前ニテ宣誓シ且ツ署名捺印シタルコトヲ證明セマス

同日於同所

立會人

鹽原時三郎
安部明

宣
誓
書

良心ニ從ヒ眞實ヲ述ベ何事ヲモ默秘セス又何事ヲモ附加セザルコトヲ
誓フ

署
名
捺
印

仙
波

勉

Dep Doc No. 1935

極東國際電事裁判所

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宣誓供述書

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自分誠我國ニ行ハルル方式ニ從ヒ先ツ別紙ノ通り宣誓ヲ爲シタル上
次ノ如ク供述致シマス

一 私仙波勉ハ明治四三年二月二日東京都ニ生レ一九三三年三月東京

帝國大學工學部ヲ卒業直ニ陸軍造兵廠大坂工廠ニ就職シ一

九三九年三月ヨリ一九四二年十月マテ陸軍省整備局主政課勤務

シマシタ又一九四四年三月ヨリ終戦マテ軍需省航空兵器総局

勤務シマシタ其間一九四二年四月陸軍技術少佐ニ任セ

一 滿洲工作機械株式會社ニ航空緊

去廷証一九四〇号Aニヨル滿洲工作機械株式會社ニ航空緊

急整備局利用致度件照會ニ関連スル停業使用件

私ガ整備局在職當時發生シタ私ハ本件ニ関スル直接

一 整備局在職當時モ右滿洲工作機械株式會社ニ對シテ

又軍需省在職當時モ右滿洲工作機械株式會社ニ對シテ

一 指導援助ヲ行ヒ來タリ

一 滿洲工作機械株式會社ニ對シテ

一、滿洲工作機械株式會社ニ修虜ヲ使用スル件ハ一九四二年五月

三日陸軍大臣御決裁也。現在ハ修虜處理ニ関スル件ニ基キ

委任事項トシテ拜次官各義勇隊出サレタモハ新アリテ是レニ依リ

一、當時ハ國內ハ勞務特ニ技術者熟練工極メテ不足シ老幼男

女ヲ問ハズ悉ク總力特技ニ應ジ全國民ハ勞務ハ部署ニ依

テバテ更情勢ヲ和シテ從テ修虜モ國際法規ニ基キ許

容サレ種類ノ程度ハ勞務ニ服セシム大臣御方針ヲアリテ

一、當時工作機械ノ需給狀況ハ國內生産力年産四万台(約四

億円)ニ對シ業者受給註總額ハ五至五万台(約三十五億円)

ヲ超エ然モ建設用資材極ク窮乏新規工場増設ハ困

難デアツタリテ既存設備ハ全面的利用ヲ企圖スル外ハ

マセテ建設用資材ヲ業者直ニ製軍並兵隊大工工場ニ供給シ

一、昭和十七年三月三日東京陸軍省一ノ三三三三三月東京

一 私仙波勉、明治四三年二月二日東京都ニ生レ、一九三三年三月東京

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務課ニシテ、其間一九四三年四月陸軍技術少佐ニ任セ、

一 昭和二十二年四月、需合社ニ國內主筆ニ任セ、

去廷証九七〇号、Aニシテ滿洲工作機械株式會社ニ航空緊

急整備ニ利用致度件照會、一 閣連、及國庫券使用件指

私ガ整備局在職當時發生シタル私ハ本件ニ関シテ直接

一 當担當者ナラズ、然レモ文部省庶務課ニ對シテ、

又軍需省在職當時モ右滿洲工作機械株式會社ニ對シテ、資

材ノ他ニ就テ間接ニ指導ニ援助ニ行ヒ、來タリ、又昭和二十二年

一 滿洲工作機械株式會社ニ對シテ、

之が爲多數ノ優秀設備ヲ有シテ然モ若ド遊休状態ニアラズ滿洲
工作機械株式會社ヲ急速ニ全面的ニ活用スルコトヲナリマシタ
然レニ滿洲ノ當時内地以上ニ勞務逼迫シテ頭腦勞動熟練
労働ニ就テハコノ傾向ガ顕著デアリマシタ。尚滿人勞務者ハ一般
技術水準低ク且出勤率不良ナル上ニ移動極ムテ頻繁ニ多
期待シ得ズ又内地人勞務者ノ滿洲移住モ幾多ノ難点カアツタ
ニテ結局修繕中機械關係ノ技術經驗ヲ有スルモノヲ選抜使用
スル計畫ヲニマシタ。

一、修繕ヲ工作機械製作ニ使用スル爲メ産業機械、鉄鋼、石
炭、輕金屬、非鉄金屬、セメント工業ノ如キ他ノ生産力擴充
部内ニ屬スル基礎産業ニ使用スルト同様デアツテ修繕ヲ兵
器彈藥ノ製造及運搬並ニ戰闘部隊ニ宛テ用ル夕材料ノ

運搬ノ如キ直接作戰行動ニ關係アル勞役ニ使用スルコトハ
全ク趣ヲ異ニスル故ニ使用スルコトニシタモテアリマシテ從來ノ
大臣ノ意圖ニ基クモノテアリマシタ。
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上由々シキ問題デ到底カ、ルコトハ爲シ得ナカシタテアリマス。
滿洲工作機械株式會社ニ對シテハ軍トシテハ軍機部滿洲
他直接兵器ノ生産ヲ企圖シタコトハ絶対ニナク軍ニ工作機
械ノ需要者トシテ要望ニ支授スル立場ニテハ軍機部滿洲
軍機部ニ對シテハ從テ軍ノ直接指導スル兵
器工業トハ別ニ別セラレタイマシタ。コノ會社ハ滿洲國經
濟部工務司ノ所管ニ屬シテイマシタ。停虜ハ卓上旋盤

(ベンチレーズ)、ジヤーマン、インデックス型自動旋盤ノ製作ニ

関與シマシタ。

~~和起~~ ~~法廷~~ ~~一九七〇年~~ ~~A~~

一 ~~本甫~~ ~~開東~~ ~~軍朱~~ ~~謀具~~ ~~休宛~~ ~~ハ~~ 滿洲工作機械株式會社ヲ航

空緊急整備ノタメ利用致度件通牒「中ニアル」航空緊急整

備ノ語句ハ同社ヲシテ工作機械ノ急速生産ヲ行ハシメ之ニ依

リ間接ニ航空機ノ増産ニ寄與セシメントシタモノデアル

淋進註一九七〇年號未明カクダリヤス。

兵器ノ直接生産ヲ計劃シ之ヲ実行シタモノデアリ

マセン。

昭和二十二年（一九四七年）七月十八日

於 東京都中央区
横町三十一 中央商区

供述者

仙波 勉

石ハ營立會人ノ而前ニテ宣誓シ且ツ署名捺印シタルコトヲ證明
シマス

同日於

立會人

塩原時三郎

安部

明

宣誓書

良心ニ従ヒ眞實ヲ述ベ何事ヲモ黙秘セズ又何事ヲモ附加セザル
コトヲ誓フ

署名捺印

仙波勉



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The employment of POW's in the production of machine tools was the same as that in the basic industries belonging to the other groups of productive expansion, such as machinery, iron and steel, coal, light and non-iron metals, and cement industries, and it was quite different from that in such labor relating directly to the operational movement as the production and transport of arms and ammunition and the transport of materials to the fighting units. This is the reason why we decided to employ them, and it was in conformity to the Minister's intention up to that time.

We could never employ the prisoners in the production of arms and ammunition as well as other labor relating directly to the operational movement, for it not only might raise a question on international laws, it also constitute a grave issue in the protection of the military secrets. The Army had absolutely no intention of engaging the Manchurian Machine Tool Company in the direct production of arms, and it remained in the position of requisitioning and assisting the company as a requisitioner of machine tools. So the company was kept strictly

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We did not project and carry out the direct production of arms and ammunition.

On this 18th day of July, 1947
at Tokyo.

DEPONENT /S/ SEBA, Tsutsumi (seal)

I, SHIOBARA, Tokisaburo, hereby certify that the above statement as 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/ SHIOBARA, Tokisaburo (seal)
ABE, Akira (seal)

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OATH

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

/S/ SEMBL, Teutomu (seal)