

No. 2658

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INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al }
 v. } No. 1
 ARAKI Sadao, et al }

A F F I D A V I T

YANO MITSUJI

1. I am a former colonel of the Japanese Army, at present residing in Tokyo. Since the middle 1930's my official duties have been largely concerned with questions of investigation of Mongolia: in February-December 1936 I served in a unit guarding the border in the Holombair district; in April 1937 I entered the Tokyo Foreign Language School, Mongolian course, as a government student; from July to November 1937 I served in the second department (intelligence) of the General Staff Office, being concerned with Mongolian affairs; in November 1937-January 1938, September-November 1938, June-July 1939 and June-July 1940 I was specially ordered to undertake investigations in various areas of Inner Mongolia, Sui-yüan and other areas adjacent to Outer Mongolia; and from February 1939 to July 1941 I was commander of the investigation detachment of the Japanese Army stationed at Kalgan, Inner Mongolia. Among other questions, I have made a special study of boundaries in Manchuria and Mongolia.

2. The territories known as Manchoukuo and the Mongolian People's Republic were originally under the same rule, that of the Ch'ing dynasty. Among the regulations adopted by the Ch'ing rulers for governing the Mongolian race was the following, to be found in the book in Japanese entitled Mongolian Topography, written by Kashiwabara Takahisa and Hamada Jun-ichi and published by Fuzanbō in 1919, Volume II, paragraph 7, "Manners and Customs", item "Festivals", interpretation of the word "obo", which book is in my possession and is produced herewith: "In cases where pasturage is carried on and no mountain or river can be found to serve as a boundary, an obo shall be established to mark the boundary. Between Hsingan-Peisheng province of Manchoukuo and Haluha-miao and Handasaya of the so-called Mongolian People's Republic there is no obo (a symbolic religious structure) to mark the boundary, but there is the river Haluha (also known as Khalkin Gol), which therefore must serve as boundary.

3. Among the literature referring to the boundary between the territories now known as Hsingan-Peisheng province and the Mongolian People's Republic is a book entitled History of Nomadic Life in Mongolia, written by the Chinese Chang Mu (1805-1849), Japanese translation by Susa Kekitsu, which book is in my possession and is produced herewith. That the boundary is the Haluha River is clearly shown by the following passage from Sec. I, "Inner Mongolia", Chap. I, para. 2, "Jaraito", page 31 of the book: "According to the Lung Sha Chi Lueh of Fang Shih-chi, 'the area from the southern part of Holombair west to the Haluha River belongs to the land of the Barga, and is originally a part of Haluha.'" Further, this is said: "The pasture lies to the north of Mount So-yueh-erh-chi and to the bank of the Haluha River" (Sec. II, "Outer Mongolia", Chap. IV, para. 1, "Che-Che-han"). These boundaries are clearly indicated on the map annexed to the book, which is attached hereto and marked Exhibit "A".

4. There is a book entitled Holombair, compiled about 1928 by an unknown author in the Chinese language, which book is in my possession and is produced herewith. In Chap. I, the section on "General Outline of Holombair", para. "Position and Area", page 1, explanation is made in the following terms of the boundary of Holombair (that which draws the line of demarcation between Hsingan-Peisheng province and the territory called the Mongolian People's Republic): "The boundary starts from Mount So-yueh-erh-chi in the south and runs in a northwesterly direction until it reaches the Haluha River, which it follows to a point northeast of Lake Bair, running through the middle of the lake, then southwest," etc. According to the map annexed to the book, which is attached hereto and marked Exhibit "B", the boundary between Hsingan-Peisheng and the Mongolian People's Republic is shown as the Haluha River.

5. The Japanese General Staff Office had maps of Eastern Asia, compiled by the Surveying Office, of a scale 1:2,500,000. The map attached hereto and marked Exhibit "C" is one of the maps used by me during my tenure of office in the General Staff Office, from which it appears that the boundary of Hsingan-

Peisheng province and the Mongolian People's Republic is the Haluha River.

6. In October 1938 I was ordered to and did make a survey of the boundary of Manchuria and Mongolia, and confirmed the above facts on the spot. I started from Haron Aershan to the Nomonhan border post, going along the Haluha River after passing through Handagaya, and on the first night camped out on the way. On the following day I passed the border post and reached the junction of the Holsten Gol (River) with the Haluha, and again bivouacked on the righthand bank of the river. On this occasion I was accompanied by two Mongolians, and noticed that our progress was followed by two Outer Mongolian mounted guards who paralleled our course on the left-hand bank of the river, keeping more than a thousand meters distant but usually staying within sight, and apparently having the purpose of watching my party. During the two days we saw no other human beings. The two Mongolian guards made no effort to cross the Haluha, nor did they make any effort to molest my party on the righthand bank. The mounted guards wore the uniform of the army of the "Mongolian People's Republic", and carried rifles. I continued through Nomonhan to Anhero without interference from the Outer Mongolian side, and accordingly reported to my superior officers that I had found the Haluha to be the boundary.

Yano Mitsuji (Seal)

Subscribed and sworn to before me, the undersigned authority, on this 20 May 1947, at Tokyo.

Ikeeda Sumihisa (Seal)

O A T E

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

Yano Mitsuji (Seal)

20 May 1947

Translation Certificate

I, Abe Fumio, of the Defense, hereby certify that I am conversant with the English and Japanese languages, and that the foregoing is, to the best of my knowledge and belief, a correct translation of the original document.

Abe Fumio

Tokyo

20 May 1947