

EXHIBIT No. 3003

(12)

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

- VS -

ARAKI, Sadao, et al

Sworn Deposition

Deponent: Hidemi YOSHIDA

Born: - 5 March, 1902

Address: No. 982 4-chome,
Shimo-Takaido,
Suginami-ku, Tokyo

I, Hidemi YOSHIDA, having first been duly sworn, do depose and say.

1. I served as a member of the staff of the Research Division of the Second Demobilization Bureau, the Demobilization Board, from June 1946 to May 1947. On the latter date I became Chief of the said Division, and am still serving in that capacity today. My work has been concerned principally with preparation and correlation of information and data to be submitted in compliance with demands from General Headquarters, Supreme Commander for the Allied Powers.

Since spring of last year I have prepared many reports of various kinds pertaining to the armaments of the former Japanese Navy upon demand of GHQ and the International Prosecution Section of the International Military Tribunal for the Far East. And I understand that a few of them - tables showing the vessels of the former Japanese Navy - have been exhibited in this Court.

2. In April of this year, the Defense Section of the International Military Tribunal for the Far East handed me a copy of an official document of the United States Navy Department pertaining to the vessels of the United States Navy, with the request that I prepare a comparative table of the vessels that the United States and Japanese Navies had already completed and had under construction as of 7 December 1941.

Since our data on the United States Navy had hitherto been largely a matter of inference and deduction I experienced no small pleasure in thus receiving for the first time such data of an

official character. In addition to the fact of the work of making accurate comparative tables of the navies of the two countries being a matter of personal interest to me, I could see no good reason for refusing to comply with the request of the Defense Section. I therefore accepted the assignment gladly and addressed myself with the utmost care to the preparation of the comparative tables in two sheets and handed them to the Defense Section upon completion. They are Defense Documents Number 1572 and 1573.

- One difficulty encountered in this work was the fact that the two navies employed different systems in the classification of their ships. Adjustments to overcome this difficulty were made in the following manner:

(a) Vessels of the United States Navy listed as CV (aircraft carrier), CVL (carrier converted from cruiser) and CVE (escort carrier), as well as vessels of the former Japanese Navy listed as aircraft carrier and converted aircraft carrier (converted from merchant ship) have all been grouped together under the single category of aircraft carriers. I adopted this method of adjustment because of my belief that it would only serve to confuse understanding if these various classes of vessels were to be treated separately, whether from the standpoint of their capacity or the purposes for which they were intended; and also because the definition of aircraft carrier laid down by the London Naval Conference of 1930 being - "The expression 'aircraft carrier' includes any vessel of war, whatever its displacement, designed for the specific and exclusive purpose of carrying aircraft and so constructed that aircraft can be launched therefrom and landed thereon" - it seemed the safest method to be guided by that definition.

(b) The United States Navy's CB (large cruiser) was included under heavy cruisers, while Japan's training cruisers were included under light cruisers.

(c) The United States Navy's DD (destroyer), DE (escort destroyer) and BDE (definition unknown to me) are all treated as

destroyers.

(d) Construction of Japan's capital ship SHINANO, along with another ship of the same type, was commenced in April, 1940. But work on both was suspended very shortly after their keels were laid the unnamed ship being dismantled, but the SHINANO being left untouched on the dock with no plan for proceeding with its construction until June 1942, when work was commenced to build it into an aircraft carrier in order to replace the carriers lost in the Battle of Midway.

For the above reason, the SHINANO is not included in the table of ships under construction, either as a capital ship or an aircraft carrier. Instead, I have merely made an annotation at the bottom of the table to the effect that there was one capital ship on which work was suspended shortly after the keel was laid.

5. In carrying out this request made to me by the Defense Section, I made one significant discovery. That was the fact that the estimate which our Naval General Staff had made of the United States Navy's strength by the process of inference and deduction was a strikingly close approximation of the actual strength as shown by the official document handed to me by the Defense Section; and that, if anything, our estimate was somewhat lower than the actual figures. All of which leads to the patent conclusion that not only the Naval General Staff's estimate of the United States naval strength, but the demand for shipbuilding programs which it submitted to the Navy Ministry on the basis of its estimate, were well grounded.

On this 15th day of August, 1947
At IMTFE, Tokyo.

DEPONENT: YOSHIDA, Hidemi

I, YOSHIDA, Hidemi 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 (signed) ONO, Seichiro (seal)

OATH

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

YOSHIDA, Hidemi (seal)

On this 15th day of August, 1947
At IMTFE, Tokyo.

DEPONENT: YOSHIDA, Hidemi

I, YOSHIDA, Hidemi 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
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Witness (signed) ONO, Seiichiro (seal)

OATH

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YOSHIDA, Hidemi (seal)