

IPS No. 3345

Exh. No. _____

STATE OF CALIFORNIA)

COUNTY OF MARIN)

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AFFIDAVIT

I, Edwin T. Layton, Captain, U.S. Navy, 58949, being now on active duty as Commanding Officer, U. S. Naval Net Depot and Net Training School, Tiburon, California, and being first duly sworn according to law, do depose and say:

That I have been in the United States naval service continually since 10 June 1920. I graduated from the United States Naval Academy on 4 June 1924, was commissioned in the rank of Ensign in the United States Navy on 5 June 1924, and after that date had the usual duty assignments of a naval officer.

On 28 September 1929 I was attached to the U. S. Embassy, Tokyo, Japan, as a student of Japanese language. From 8 October 1932 to February 1933 I was assistant Naval Attache, U. S. Legation, Peking, China. From 12 April 1933 to 17 May 1933 and from 30 June 1936 to 16 February 1937 I was an Intelligence Officer at the Office of Naval Intelligence, Navy Department, Washington, D. C. From 5 April 1937 to 17 March 1939 I was Assistant Naval Attache, U. S. Embassy at Tokyo.

From 28 April 1939 to 8 October 1940 I was Commanding Officer of the USS BOGGS with the rank of Lieutenant Commander. On 7 December 1940 I was assigned to duty as Fleet Intelligence Officer on the Staff of the Commander-in-Chief, U. S. Pacific Fleet and served in that post through the early part of the war and up until 13 March 1944 when I became Combat Intelligence Officer on the same staff. While on these assignments I was promoted to Commander then to my present rank of Captain, U. S. Navy. I remained as Combat Intelligence Officer until 25 February 1946 after which I was assigned to my present station, having completed more than five years and four months in the top intelligence post on the staff of the Commander-in-Chief, U. S. Pacific Fleet.

During my tour as Fleet Intelligence Officer, my duties as set forth in the staff instructions issued to the staff of the Commander-in-Chief, the United States Pacific Fleet, under date of July 14, 1941, which were in effect the day of the Japanese attack on Pearl Harbor on 7 December 1941, were as follows:

- ... Directs the assembly of enemy information and evaluates the same; disseminating to the various members of staff, indicating where action is required.
- B. Provides operation officer and war plans officer with information essential for current estimates; prepares monograph material.

- C. Maintains section 2 sub-paragraph A, B, C, D, E, F and G of the estimate of situation, enemy forces; maintains location plot of Fleets of possible enemy or Allies.
- D. Directs counter-espionage and counter-information.
- E. Maintains intelligence records. (See the Naval Intelligence Manual.)
- F. Prepares Fleet intelligence bulletins.
- G. Evaluates intelligence information received of procedures of processes of other navies, and prepares definite recommendation as to any action to be taken within our own Fleet.
- H. In charge of censorship.
- I. Internal security of ships.
- J. Supervises reconnaissance photographic activities.

That same instructions specified that the Assistant Intelligence Officer, in addition to assisting me generally in intelligence duties, would perform the following duties:

- A. Maintain Merchant Marine plot and analyses.
- B. Prepare silhouettes of own and enemy ships and planes for dissemination to the Fleet.
- C. Assembly, evaluation and dissemination of enemy information
- D. Maintenance of current estimates of situation enemy forces and location of plots of fleets of possible enemies or Allies.

Information came to me from the Chief of Naval Operations subdivision of Naval Intelligence, Fourteenth Naval District Combat Intelligence Unit and at infrequent intervals from various sources, confidential and otherwise, on the islands concerned, from merchant ships, our own ships, air reconnaissance and other communication intelligence, such as, Cavite and OPNAV. I assembled, analyzed, evaluated and correlated all information at hand, new and old, prepared and distributed tables, sketches, maps and other desired records.

In the further performance of such duties I prepared various letters and bulletins which were published by the Commander-in-Chief, U. S. Pacific Fleet. Such publications frequently included tables, maps or other necessary relative material, all of which was prepared by me from official information I had received in my capacity as intelligence officer. Two of such documents were; (1) Secret letter Cincpac File No. Serial 069W, dated August 7, 1941, regarding organization of Orange Fleet and Orange Activities in the Mandate Islands, and (2) Pacific Fleet Intelligence Bulletin #45-41, dated 27 November 1941, with respective enclosures mentioned in each. References to such documents in this affidavit refer to them as Document No. 1 or Document No. 2 respectively. A certified photostatic copy of each such document is attached hereto and made a part hereof.

Another document, referred to herein as "Document No. 3", is selected declassified portions of Commander Task Force EIGHT (Admiral W. F. HALSEY, USN) SECRET letter A16-3 (006), dated 9 February 1942 to Commander-in-Chief, U. S. Pacific Fleet, regarding action in the Marshal Islands 1 February 1942. A certified photostatic copy of such document is attached hereto and made a part hereof.

I have examined the testimony of IWASAKI, Asashichi as recorded in the Transcript of the Records of the International Military Tribunal for the Far East, on pages 26, 522 to 26, 527, both inclusive, dated 21 August 1947, and the testimony of YOSHIDA, Hidemi as recorded in said Transcript of the Record on pages 26, 467 to 26, 488, both inclusive, dated 21 August 1947.

On pages 26, 485 & 26, 486 of the transcript Captain Yoshida distinguished between a "konkyochi" and "kichi". He admitted these air bases were there (pages 26, 472 and 26, 473). To my knowledge, almost every Japanese base throughout the war, except the very major ones, were called "kichi".

Moreover, page 323 of the Japanese-English Dictionary of Sea Terms by Lt. Comdr. C. Ozaki, published by the "Suikosha" (Japanese Naval Officers' Club) of Tokyo, shows the Japanese word "Kichi" defined as "base", and gives 10 examples of detailed use of the word "Kichi" with various kinds of bases such as "submarine base", "naval base", "repairing base", "base commander", "base of operations", etc. On page 368 of said dictionary, "Konkyochi" is also defined as a "base", and given thereunder are eleven examples of the use of this word, such as "submarine base", "naval base", "repairing base", "fleet base", "base-hospital", etc.

Both Japanese words, "Konkyochi" and "Kichi" are used interchangeable with the English word "base".

A reference to the same author's English-Japanese Dictionary of Sea Terms, published by the same semi-official organ, shows on page 58 the English word "base" to be represented by the Japanese words "Kichi" or "Konkyochi", and gives thereunder four examples where either, or both, "Konkyochi" or "Kichi" are used for "advance bases", "aviation bases", "naval bases", and "operating bases". It is to be remarked that these are the English and Japanese equivalents, as defined by the author, a Japanese regular naval officer, then on active duty. Though he does not so state directly, Captain Yoshida does intimate that the U. S. Navy used an expression "Available Spot" to apply in some way to a kind of base. The U. S. Navy has never used the term "available spot" for "base", whether temporary, advanced or permanent base. The spots where landing fields were marked in Table A of Document No. 2 are for all practical purposes correct, except the one reported on Enybor (which report came from a foreign source and has since been proven wrong) and Kapingemerangi (Greenwich Island), which were seaplane bases. Table A shows military aircraft of the Naval Air Corps were operating from Notje, Ruotto (Roi) and Imieji. The reported air unit at Enybor was in

error for Imieji. Captain Yoshida gave us the Japanese Navy's conception of the word "fortification" (page 26,486, line 12). Table A of Document No. 2, Document No. 3 and photographs (Exhibits No. 1253-A and No. 1253-B) establish that their so-called "kichi" on the mandated islands actually:

- (1) Had armament and fixed defensive facilities with which they could resist and defend themselves from an enemy attack from land, sea and air.
- (2) Were defended by Naval land forces.

By applying the Japanese definition, as given by Captain Yoshida; himself, those "kichi" were definitely fortifications. Wherever Table A shows an air base, it is a Japanese Naval air base which Captain Yoshida is careful to state (page 26,470) is an air base developed purely for commercial purposes, such as the "observing of fish and rescuing mariners".

Captain Yoshida contradicts himself when he describes installations on the mandates as purely cultural and admits the existence of the air fields which check the aforementioned Table A very nicely. He, by his statement on page 26,472, confirms that the air field was started on Wotje in 1940, as the prosecution contended and offered Court Exhibit No. 1253-C in proof. That exhibit, in addition to showing an air field, shows also projected an actual military installations which the Halsey task force (Document No. 3), found to be actual. Further, the photographs, Exhibits No. 1253-A and No. 1253-B checked actual locations of military installations with aforesaid Exhibit No. 1253-C. Those photographs were taken only 53 days after the Japanese had attacked Pearl Harbor. That time, only 53 days, was insufficient for the Japanese to have built those installations after December 7, 1941 and had them in full working order on 31 January 1942, which was the date of the Halsey task force attack (Document No 3). Iwasaki states that the exhibit was for planning purposes only (page 26,525). The installations were actually there.

Documents No. 1 and No. 2 show that Wotje, Roi ("Ruotto"), and Taroa were fortified well before the attack on Pearl Harbor. Document No. 3 confirmed the fact that those three islands were well fortified with coastal defense guns, anti-aircraft guns, storage houses and other facilities, that, by the Japanese definition, constitute a naval base.

Pages 12, 13 and 16 of Document No. 1, show there were "Jaluit Detached Force", "Wotje Detached Force", "Taroa Detached Force", and "Ponape Detached Force". These are carried as detachments of the Sixth Defense Force which (a) was a regularly constituted Japanese shore based naval "defense" organization, (b) was equipped with its table of organization of troops, arms and munitions, and (c) had the job of manning the coastal defense and AA gun batteries. That the mission of the Sixth Defense Force was not entirely defensive is shown by the fact that a part of the Sixth Defense Force took part in the Japanese assault and occupation of Wake

Island after the outbreak of hostilities. (The Second Company of the Special Naval Landing Force which made the assault was composed from the Sixth Defense Force and commanded by Takano). It is to be noted that on most of the principal islands there was a branch office of the Fourth Supply Detachment and a branch office of the Fourth Military Stores (munitions) Department. The first of these was a technical naval supply sub-station. The second corresponds to U. S. ordnance supply sub-station charged with handling stores of ammunition, weapons, bombs, torpedoes, etc. Further, on these islands were detachments of the Fourth Civil Engineers, engineers from Yokosuka Navy Yard and engineers from the Kure Navy Yard. These engineers were normally civilian technicians under direction of naval officers, utilized in building certain advance base work and are paid from naval funds. I emphasize that their's was a military, not civilian, function. Table A of Document No. 2 (page 738) lists in tabular form more up-to-date (November 27, 1941) intelligence on Japanese installations in the mandated islands and is a condensation of information referred to above. It will be noted that ordnance specialists were stationed and assigned to various of the mandated islands. Their job was to supervise the ordnance installations, anti-aircraft and coastal defense guns; storage for bombs, ammunition and torpedoes, and the installation of pill-boxes, etc.

Documents No. 1 and No. 2 show that the first Japanese move to bring large amounts of naval personnel, naval materiel, naval engineers and ordnance experts to the Marshalls was actually observed in mid-December 1940. Yoshida denies their existence (page 26,474) until a decision made in November 1941 (page 26,477). There is not the slightest shadow of a doubt that our intelligence indicating the movement in 1940 is correct and that Yoshida suffers a year's lapse of memory. From information I had at hand at the time, I am positive that "the organization of construction, procurement of necessary materials, allotments of ships, etc. took place" (page 26,477) not on November 5, 1941, as he says, but probably November 5, 1940, as we picked up the indications of such a movement in December 1940.

On page 26,476, Captain Yoshida admits landing of guns and, in fact, leaving some of them on some of the mandated islands for "weathering tests". Captain Yoshida by his own admission of knowledge in these matters should know that their installation in permanent positions (and they were so installed) would have required a matter of many months of construction, labor, etc., and the counter-battery gun fire these batteries threw at the USS NORTH HAMPTON and SALT LAKE CITY off Wotje on 31 January 1942 represented approximately 5,000 to 6,000 meter range (page 26,476). Certainly the court cannot believe these were "obsolete guns".

Mr. Yoshida may be correct in his statement that fuel oil (page 27,478) for the fleet was to be taken from tankers, but he also admits that they had commenced construction of a considerable amount of oil storage tanks which were for ultimate military purposes. Oil storage on Wotje was not

commercial storage; it was naval construction for the navy, as no commercial liners of Japan or any other nation made scheduled stops at Wotje. Hence the installations could not be for commercial but were for military uses. There were military or "ordnance stores" (Document No. 1 and No. 2) on these islands. Hence, I cannot believe his contention that ammunition, bombs, aviation fuel, etc., were to be entirely drawn from ships, (page 26,478) nor can I believe his statements regarding "supply dumps".

His assertion of a shortage of ordnance material by the Japanese is the rankest of "window dressing". It is my firm belief that no nation would start a war believing they were short of ordnance materials; and the Japanese did commence a war on 7 December 1941. Captain Yoshida admits that his statement regarding the absence of an air field on Wotje (page 26,483) is hearsay.

Further, it is contradicted (page 26,472) by his own admission that one runway was started there in 1940.

/s/ EDWIN T. LAYTON
EDWIN T. LAYTON

Subscribed and sworn to before me this 12 day of November 1947 at Tiburon, California.

R. R. Hodge
/s/ Lieutenant, US Navy