

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: KUBOTA, Tokujiro

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.

1. I am KUBOTA, Tokujiro. I am presently living in KUBOTA-Mura, SHIMOTSUGA-Gun, TOCHIGI-Prefecture. I was born in Osaka on the 14th day, July, the 24th year of Meiji (1891). I was the President of the Manchurian Engineering Machinery Company Ltd. (MANSHU KOSAKU KIKAI KABUSHIKI KAISHA) from June, the 17th year of Showa (1942) to February, the 19th year of Showa (1944).
2. The matter of using prisoners of war concerning court exhibit No. 1970-A took place when I was the President of the Manchurian Engineering Machinery Company Ltd., so, I shall depose as follows

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concerning the real circumstances of the use of the prisoners in connection with this case as the said president at that time.

(1) Although, there arrived at Mukden approximately 1,300 prisoners of war towards November, the 17th year of Showa (1942), it was about February, the 18th year of Showa (1943) that the said company commenced to employ the POWs, and their number was about 50. Thereafter, the number of P.O.W.s were gradually increased, and their peak reached about 600. According to the first plan, we were going to use about 1,000 P.O.W.s, however, the percentage of actual workers was 60% at the highest rate. This was due to the fact that as a consequence of an investigation of the P.O.W.s abilities, we found out a number of them were farmers and that there were fewer experienced mechanics than we had expected. Also because of the fact that we did not work them improperly taking into consideration such things as the P.O.W.s health, ability, rank etc.

~~By the way,~~ The employees of our company numbered approximately 300 Japanese and about 700 Manchurians --- totalling about 1,000, when we first began to use the P.O.W.s; at the peak we had approximately 800 Japanese and about 1,200 Manchurians --- totalling about 2,000.

(2) Our company manufactured machinery belonging to the category

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of enlarging productive power, and as far as I know there were no plans established either by the Army, or by Manchukuo or by our company also, to make the company a military factory, and not a single order was received by our company from any arms manufacturing factories in Manchuria, Japan proper and other places, to produce arms or parts thereof. Consequently, our company never used the P.O.W.s to engage in work related with the manufacture of arms or with work directly concerned with the operations of war.

3. As mentioned above, there were so few technically experienced workers among the prisoners of war, contrary to our first expectations, that at first, although they attended the factory every day they did not do any work worth mentioning. In the meantime, in compliance with the desire of the majority of the POWs we decided to teach them the techniques of machinery manufacture. We purchased about five tons of pig iron and steel materials from the 918th Army unit in Manchuria at that time, to be used as material for the educational program and we classified the P.O.W.s into mechanics, finishers, fitters, tool makers, blacksmiths, carpenters, draftsmen, designers, warehouse-keepers, automobile repairmen etc. and taught them the techniques of machinery manufacture under the leadership of the company's engineers and skilled workers. As a result of this, after my

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resignation as president of the company, an automatic lathe was made.

4. Colonel MITSUDA, Chief of the internment camp in Mukden, inspected our company frequently and instructed all the Japanese and Manchurian employees to treat the P.O.W.s with charity and tolerance. Consequently ^{there no} ~~there~~ was discriminatory treatment between the Japanese, Manchurian and the P.O.W.s, ^{There was no} ~~with us~~ ill feeling. They were able to work with pleasure in perfect harmony as one.

5. The prisoners of war were idle and felt awkward doing no work whatsoever during the interval and before reporting to the factory after their arrival at Mukden but, they used to visit the factory now and then as they desired: A party for the P.O.W.s was held in the main dining hall of the factory on Christmas Eve, 1942 in accordance with the P.O.W.'s desires. Though various materials were not easily available at that time, we bought tobacco, Candy, apples, oranges etc. by all possible means and distributed them to the P.O.W.s; and the P.O.W.s themselves contributed to the party by putting on skits and other entertainment.

On this 5th day of August, 1947

At Nippon Industrial Bank, Marunouchi, Chiyoda-Ward, Tokyo.

DEPONENT: KUBOTA, Tokujiro (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)

OATH

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

/S/ KUBOTA, Tokujiro (seal)