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Exhibit # _____

ERRATA SHEET

The following correction should be made on the
Affidavit of SAKAKIBARA, Kazue:

Page 4, Paragraph 8, Line 6,

"HSUPUCHEN"

should read

"PAINAOKIANG"

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

-vs-

ARAKI, Sadao, et al

Sworn Deposition(Translation)

Deponent: SAKAKIBARA, Kazue

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 was formerly Colonel of the Army and am now Chief of the Personnel Section, First Demobilization Bureau.
2. I was nominated to the staff-officer of the Expeditionary Force to Shanghai when it was organized in August of 1937 (12th year of Showa) and was ordered to take charge of logistics of the Force. Landing at Woosung on the 23rd of August, I transacted supply of ammunition in the first stage, but when our army entered into Nanking I was concerned with transport business, and returned to Japan, receiving the order on the 23rd of January of the following year.
3. I am well acquainted with the plan of operation held by General

Matsui as I had always received his orders directly and been consulted by him in the Hqs since the Expeditionary Force to Shanghai was organized.

4. As the Expeditionary Force was organized suddenly with no preparations and plan, it was decided that without waiting for completion of organization of the whole force the units which had completed mobilization should be sent one after another to the front to be in time for rescuing the Naval Landing party which had been fighting under great difficulty in Shanghai Area. This detachment consisted of four battalions of infantry and two batteries of artillery totalling 5000 of men of the 3rd division and four battalions of infantry and two batteries of artillery 5000 of men of the 11th division, and eight peices of gun, but owing to shortage of preparative ammunition, they could carry only 400 rounds per gun totalling 3200 rounds.
5. The strength being so small as has been described above we fought the battle against heavy odds, though we were gradually reinforced later, so General Matsui's landing delayed about two weeks. Moreover, owing to the spread of epidemics, such as Cholera, Dysentery, etc., we changed the whole Paoshanchen into a quarantine-hospital to receive patients there. Though these epidemics were precluded in October, our fighting

power showed some times a marked fall in consequence.

Moreover, the battle had been fought under great difficulty from want of ammunitions and provisions. I think those difficulties above stated were caused absolutely by the want of preparation for the military operations in this district and by the consequence of the gradual use of forces according to the principle of not expanding the case.

6. The Expeditionary Force to Shanghai too, had sometimes requisitioned munitions in the occupied area according to the formalities established in the Field Service Regulations.

Requisition is always executed by the carrying money chest, the plan being mapped out by the account-officer in the battalion, and the smaller unit than a battalion or each individual is strictly prohibited to do it without permission. It is a matter of course to pay a compensation when the requisition is executed.

7. We were embarrassed in executing the requisition in occupied areas between Shanghai and Nanking where neither inhabitants nor administrative authorities to negotiate with had not remained.

In such cases we had inevitably to use the commodities to be requisitioned without personal consent of the possessors, and we used to put up a poster on which the kind and amount of the goods requisitioned were described, so that the possessors might be informed

of the fact and come to the headquarters to receive their compensation.

I actually witnessed such process being taken for the rice warehouses at Wuhsi.

8. When ever the owners or the administrative authorities remained in the occupied area, we negotiated with them to ask their consent and got the commodities requisitioned smoothly after paying equivalent to them.

Many times I acted in that manner, notably, I remember, the case in landing operation at Hsupuchen. Where the village-head remained to take administrative responsibility. I negotiated with him and got supply of provisions and forage. As we paid reasonable compensation for this and as we took measure to protect inhabitants remained in that place, the village-head thanked us for the orderly action of our troops and gave us a cordial reception.

At Chenshu, too, there were cases like that.

9. Furthermore, I directed in many places, by means of my autographed notice-boards, safeguard of the inhabitants and prohibition of looting in many other places. I took all those measures above stated in accordance with the intention of General Matsui.

Nobody remaining to take administrative responsibility, personal negotiation was impossible in Nanking. Consequently it is

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conjectured that our troops executed requisition according to the convenient measures stated above. As for requisition from the refugee quarter in the city, I have never heard about it.

10. Both troops of Chinese and Japanese practiced incendiarism in the front as a tactical method.

That which was practiced by Chinese troops prior to their retreat caused considerable damage in various places which hindered our advance or the relief and pacification after occupation.

There had been fires before our occupation of Nanking, but no conflagration after the fall of the city. So far as I know only the small part of the city was burnt, the greater part of it being safe from fire. It is clear, if we glance the spot that the neighbourhood of Tokyo as well as another central places remain as it is before the battle.

11. I saw that the buildings of the Foreign Affairs Department and the Military and Navy Department were used as a hospital for the wounded and the sick Chinese.

However, the medical equipment was insufficient and the reception of the patients seemed to be difficult. There cannot have been any massacre there. On the contrary we gave them rice and medical supplies.

Do what we might, they never recovered, it seems, and died, as most of them were in serious condition.

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of the ... conditions.

12. We scarcely captured war prisoners before entry to Nanking, and I was told that our troops captured approximately 4000 in the vicinity of Nanking one half of whom were sent to Shanghai and the rest detained in Nanking.

Though I saw several of them were employed for common labour, I never maltreated them, dismissing them when their duties were over.

A certain Liu of Szechsien is an actual case whom I so dismissed. The treatment of prisoners can be ascertained by hearing him. Decampment and theft were frequently committed by war prisoners and I suppose the later crime was duly punished according to law but the former crime, as I understood it, was let alone without punishment.

13. In official written orders, "nominated to" means that the personnel nominated to is installed in the fixed position within the full strength of officials. but "appointed irregularly" means that the personnel appointed has no fixed post without the full strength of officials and he is an official without portfolio. In the curriculum vitae of General Matsui "Appointed to attach to the General Staff Office (dated 21 Dec. of 3rd year of Showa)" means that he was installed in the General Staff Office as an official but had no fixed post (He was then travelling through Europe).

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On this 20 day of Feb., 1947

At Tokyo

Deponent: SAKAKIBARA, Kazue (seal)

I, JODAI, Takayoshi 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: /S/ JODAI, Takayoshi (seal)

OATH

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

/S/ SAKAKIBARA, Kazue (seal)