Exhibit No._ Def. Doc. 2615 INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST THE UNITED STATES OF AMERICA, et al RECEIVEL OCT 1 1947 ARAKI, Sadao, et al AFFIDAVIT Deponent: TAKAYAMA, Hikoichi I was a Staff Officer of the 37th Army in Borneo from September 1944 till the termination of the war. My last rank was Colonel. Now I live at No. 89 Minami-Kuruwamachi, Maebashi-Shi, Gumma Prefecture. 2. It was about the latter part of May 1945 when the 37th Army was transferred from the direct control of the South Seas Expeditionary Army and put under the command of the 7th Area Army. 3. The Prisoner of War Camp of North Borneo was controlled by the Headquarters of the South Seas Expedition-By the regulations and orders of tr Comma der.in-Chief of the South Sess Expeditionary Army, the 37th Army comman er was entrusted with supplying the POV's and to issue orders within limited sphere to the Chief of the Prisoner of War Camp, in regard to defense measures (guard, air defense, land fighting) etc. It was, however, not within his capacity to interfere in the mana ement of the Prisoners of War. 4. About January 1945 the Commander of the 37th Army received instructions from the Commander-in-Chief of the South Seas Expeditionary Army to move the main forces of the Army, then stalloned in the north east of Borneo, the west coast of the Island. In accordance with the instructions, the Commander of the 37th Army ordered the main forces stationed on the east coast of Borneo to move to the west coast and this order was carried out. At the same time he ordered the transfer of POW's of the Allied Forces in the vicinity of Sandakan to a basin near Banau (phonetic) from the view point of defense, taking into consideration the danger of bombings and the pressing food situation in the Sandakan District. The Ranau area was then comparatively safe and self-sufficient in food. The transfer of POW's was carried out by order on two occasions at the end of January and in the early part of May 1945. 5. About May 1945 bombings by the Allied Forces became so intense that the communication by sea between Nor Borneo and French Indo-China, Malay, etc. was entirely cut off and also that by air was in great difficulty. The Headquarters of the 37th Army moved from Jess ... ton to Sabon (phonetic) in the beginning of May 1945.

Def. Doc. 2615 The Keningo (phonetic) air-field was employed for use of planes acting as liaison between the Army Headquarters and the outside but it took about one day to go between the Headquarters and the air-field. Although the telephone was operated between the points, it was frequently broken. Only radio was available for communication with the 7th Area Army, but the apparatus was frequently broken as the machine had been removed from JESSELTON just before that time. Besides that owing to the shortage of fuel and batteries communication schedule hours were greatly cut down. Thus the communication was run in an extremely inefficient way, and was limited solely to the matters of most importance. Even this was often interrupted. The situation grew worse as the war neared its end. On this 22day of Septs 1947 At Tokyo DEPONENT: TAKAYAMA, Hikoichi (Seal) 1, SASAGAWA. Tomoji, hereby certify that the above statement was sworn by the Deponent, who affixed his sig-nature and seal thereto in the presence of this Witness. On the same date, at the same place. Witness: /s/ SASAGAWA, Tomoji OATH In accordance with my conscience I swear to talk the whole truth withholding nothing and adding nothing. /s/ TAKAYAMA, Hikoichi