

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Application of The Japanese Educational Institute
of New York,

Petitioner.

For an order approving the sale of assets pursuant to
N-PCL §§ 510 and 511.

Index No. 06-103400

IAS Part 13
Hon. Sheila Abdus-Salaam

AFFIDAVIT

AFFIDAVIT OF KYOKO KAJIWARA

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

KYOKO KAJIWARA, being duly sworn, deposes and says:

1. I have been a member of the Japanese School of New York PTA (the “PTA”) since 2004. I have two children attending the school, a nine year old girl and a ten year old boy.
2. I am submitting this affidavit in support of the PTA and in opposition to the petition seeking court approval of the proposed sale of the Greenwich Campus of the Japanese Educational Institute of New York (“JEI”).
3. Along with Mrs. King, Mr. Jachmann and Mr. Adachi, I met with Mr. Hiroshi Sato for over three hours at the Japanese Consulate in New York. The date was October 25, 2005. Mr. Sato is a JEI Trustee. He also is the Deputy Consul-General of Japan.
4. Of the 37 Trustees who were repeatedly asked to meet with JSNY parents, Mr. Sato was only the second Trustee to agree to meet with parents before the JEI Board of Trustees voted to sell the school. However, he told us at the beginning of the meeting that he would abstain from the voting to sell the school.

5. My impression at the meeting was that Mr. Sato understood the PTA's worrying over the education of their children and had some sympathy with us.

6. Among what Mr. Sato explained to us about JEI's plan to sell the Greenwich campus was the following.

- He said that there was no fiscal crisis. JEI had reserve funds that would last 6 to 8 years even at current levels of unusually low enrollment, but the Trustees were all businessmen who liked to make quick decisions and dispatch problems.
- He pointed out that the Trustees would soon vote to sell the school for two reasons: a) The Trustees were angry at the parents for questioning their authority; and b) the Trustees were afraid of a lawsuit from the buyer.
- Mr. Sato also said it was wrong for JEI to keep the decision to sell the school a secret from the parents.
- He said he thought that the JEI Board was not properly constituted and should include parents, teachers, and principals.

7. When Mr. Sato explained the above facts to us, I thought that he was trying to be honest and to disclose the facts. And even Mr. Sato himself could not tell the facts to general audience because he was one of the trustees who consider Japanese compromise be most important. That is the atmosphere I felt at the meeting – that JEI would inevitably push the sale of the school through to conclusion based on incorrect facts and that the trustees would support the sale because the Japanese style of board governance management prohibited any disclosure of the correct facts if they would cause the JEI leadership embarrassment.

8. Finally, Mr. Sato also told us at the meeting that it was true that Sen. Joseph Lieberman had telephoned Mr. Sato's superior, Amb. Ando, Consul-General of Japan, regarding the sale of the Greenwich Campus to WFHA. Mr. Sato confirmed that after speaking to Sen. Lieberman on the telephone, Amb. Ando made a trip to Washington just to speak further with Sen. Lieberman in person about the Senator's concerns that the sale might be in jeopardy.

9. JEI's Petition should be denied. The fiscal problems of the JSNY can be easily fixed by reducing the high JEI staffing levels and substituting parent volunteers, and by renting parts of the campus - including some buildings to other schools who have repeatedly expressed interest in sharing the JSNY campus, including the British Schools of America, a local kindergarten, and a local extracurricular school. The campus chapel also has significant income potential for weddings – something that has been sadly underutilized due to the lack of interest by JEI management.

KYOKO KAJIWARA

Sworn to before me this
27th day of March, 2006

Notary Public