

**Japanese China Expeditionary Army (Nanking)**  
**1 October 1939**

Commanding Officer: General Juzo Nishio

Attached to the Army:

3rd Air Group: Lt. Gen. Hayashi Kinoshita

21st Army: Lt. General Rikichi Ando (Canton)

18th Division:

55th Infantry Regiment  
56th Infantry Regiment  
114th Infantry Regiment  
18th Mountain Artillery Regiment  
(36-75mm mountain guns)  
12th Engineer Regiment  
18th Signal Unit  
12th Transport Regiment

38th Division:

228th Infantry Regiment  
229th Infantry Regiment  
3rd Mixed Regiment  
38th Mountain Artillery Regiment  
(36-75mm mountain guns)  
38th Engineer Regiment  
38th Signal Unit  
38th Transport Regiment

104th Division:

108th Infantry Regiment  
137th Infantry Regiment  
161st Infantry Regiment  
104th Cavalry Regiment  
104th Artillery Regiment (36-75mm guns)  
104th Engineer Regiment  
104th Signal Unit  
104th Transport Regiment

Formosa Mixed Brigade:

1st Formosa Infantry Regiment  
2nd Formosa Infantry Regiment

21st Independent Air Unit:

organization unknown

13th Army: Lt. General Susumu Fujita (Shanghai)

15th Division:

51st Infantry Regiment  
60th Infantry Regiment  
67th Infantry Regiment  
21st Artillery Regiment (36-75mm guns)  
15th Engineer Regiment  
15th Signal Unit  
15th Transport Regiment

17th Division:

53rd Infantry Regiment  
54th Infantry Regiment  
2nd Mixed Regiment  
17th Divisional Reconnaissance Unit

23rd Artillery Regiment (36-75mm guns)  
17th Engineer Regiment  
17th Signal Unit  
17th Transport Regiment  
116th Division:  
109th Infantry Regiment  
120th Infantry Regiment  
133rd Infantry Regiment  
120th Cavalry Battalion  
122nd Artillery Regiment (36-75mm guns)  
116th Engineer Regiment  
116th Signal Unit  
116th Transport Regiment  
11th Independent Mixed Brigade:  
organization unknown  
12th Independent Mixed Brigade:  
organization unknown  
13th Independent Mixed Brigade:  
organization unknown  
11th Army: Lt. Gen. Yasuji Okamura (Hankou)  
3rd Division:  
6th Infantry Regiment  
34th Infantry Regiment  
68th Infantry Regiment  
3rd Cavalry Regiment  
3rd Artillery Regiment (27-75mm guns)  
3rd Engineer Regiment  
3rd Signal Unit  
3rd Transport Regiment  
6th Division:  
13th Infantry Regiment  
25th Infantry Regiment  
45th Infantry Regiment  
6th Cavalry Regiment  
6th Artillery Regiment (36-75mm guns)  
6th Engineer Regiment  
6th Signal Unit  
6th Transport Regiment  
13th Division:  
65th Infantry Regiment  
104th Infantry Regiment  
116th Infantry Regiment  
13th Division Cavalry Unit  
19th Mountain Artillery Regiment  
(36-75mm mountain guns)  
13th Engineer Regiment  
13th Signal Unit  
13th Transport Regiment  
33rd Division:  
213th Infantry Regiment  
214th Infantry Regiment  
215th Infantry Regiment  
33rd Mountain Artillery Regiment  
(36-75mm mountain guns)  
33rd Engineer Regiment

33rd Signal Unit  
33rd Transport Regiment

34th Division:

216th Infantry Regiment  
217th Infantry Regiment  
218th Infantry Regiment  
34th Reconnaissance Regiment  
34th Artillery Regiment (36-75mm guns)  
34th Engineer Regiment  
34th Signal Unit  
34th Transport Regiment

39th Division:

231st Infantry Regiment  
232nd Infantry Regiment  
233rd Infantry Regiment  
39th Reconnaissance Regiment  
39th Artillery Regiment (36-75mm guns)  
39th Engineer Regiment  
39th Signal Unit  
39th Transport Regiment

40th Division:

234th Infantry Regiment  
235th Infantry Regiment  
236th Infantry Regiment  
40th Reconnaissance Regiment  
40th Artillery Regiment (36-75mm mountain guns)  
40th Engineer Unit  
40th Signal Unit  
40th Transport Unit

101st Division:

101st Infantry Regiment  
102nd Infantry Regiment  
101st Cavalry Regiment  
101st Artillery Regiment  
101st Engineer Regiment  
101st Signal Unit  
101st Transport Regiment

106th Division:

111th Infantry Regiment  
136th Infantry Regiment  
106th Cavalry Regiment  
106th Artillery Regiment  
106th Engineer Regiment  
106th Signal Unit  
106th Transport Regiment

14th Independent Mixed Brigade:

243rd Infantry Regiment  
244th Infantry Regiment  
245th Infantry Regiment  
246th Infantry Regiment  
14th Independent Infantry Brigade Signal Unit

North China Area Army: General Hayao Tada (Peking)

Attached to Army:

27th Division:

1st China Garrison Infantry Regiment  
2nd China Garrison Infantry Regiment  
3rd China Garrison Infantry Regiment  
27th Divisional Reconnaissance Unit  
27th Mountain Artillery Regiment  
(36-75mm mountain guns)  
27th Engineer Regiment  
27th Signal Unit

35th Division:

219th Infantry Regiment  
220th Infantry Regiment  
221st Infantry Regiment  
25th Division Tankette Unit  
35th Artillery Regiment (24-75mm mountain guns)  
35th Engineer Regiment  
35th Signal Unit  
35th Transport Regiment

108th Division:

240th Infantry Regiment  
241st Infantry Regiment  
242nd Infantry Regiment  
108th Artillery Regiment (1 bn)  
108th Engineer Battalion  
Raiding Battalion  
Engineer Company  
2 Horse Drawn Transportation Companies  
1 Motor Transport Company  
1 Divisional Signal Unit  
1 Divisional Medical Unit

110th Division:

110th Infantry Regiment  
139th Infantry Regiment  
140th Infantry Regiment  
163rd Infantry Regiment  
110th Cavalry Battalion  
110th Engineer Regiment  
110th Signal Unit  
110th Transport Regiment

Cavalry Group:

organization unknown

1st Independent Mixed Brigade

72nd Independent Infantry Battalion  
73rd Independent Infantry Battalion  
74th Independent Infantry Battalion  
75th Independent Infantry Battalion  
76th Independent Infantry Battalion  
1st Independent Mixed Artillery Unit  
1st Independent Mixed Engineer Unit  
1st Independent Mixed Signal Unit

7th Independent Mixed Brigade

organization unknown

8th Independent Mixed Brigade

31st Independent Infantry Battalion  
32nd Independent Infantry Battalion  
33rd Independent Infantry Battalion  
34th Independent Infantry Battalion  
35th Independent Infantry Battalion  
8th Independent Mixed Brigade Artillery Unit  
8th Independent Mixed Brigade Engineer Unit  
8th Independent Mixed Brigade Signal Unit

15th Independent Mixed Brigade

organization unknown

Mongolian Garrison Army: Lt. Gen. Masataka Yamawaki (Wanchuan)

26th Division

11th Independent Infantry Regiment  
12th Independent Infantry Regiment  
13th Independent Infantry Regiment  
26th Divisional Reconnaissance Unit  
11th Independent Artillery Regiment (16-57mm guns,  
4-105mm & 4-150mm howitzers)  
26th Engineer Regiment  
26th Signal Unit  
26th Transport Regiment

2nd Independent Infantry Brigade:

1st Independent Infantry Battalion  
2nd Independent Infantry Battalion  
3rd Independent Infantry Battalion  
4th Independent Infantry Battalion  
5th Independent Infantry Battalion  
2nd Independent Mixed Brigade Artillery Unit  
2nd Independent Mixed Brigade Engineer Unit  
2nd Independent Mixed Brigade Signal Unit

12th Army: Lt.Gen. Sadakata Iida (Chinan)

21st Division:

62nd Infantry Regiment  
82nd Infantry Regiment  
83rd Infantry Regiment  
21st Division Tankette Company  
51st Mountain Artillery Regiment  
(36-75mm mountain guns)  
21st Engineer Regiment  
21st Signal Unit  
21st Transport Regiment

22nd Division:

84th Infantry Regiment  
85th Infantry Regiment  
86th Infantry Regiment  
22nd Infantry Group Tankette Company  
52nd Mountain Artillery Regiment  
(36-75mm mountain guns)  
22nd Engineer Regiment  
22nd Signal Unit  
22nd Transport Regiment

32nd Division:

210th Infantry Regiment  
211th Infantry Regiment

212th Infantry Regiment  
 32nd Artillery Regiment (36-75mm mountain guns)  
 32nd Engineer Regiment  
 32nd Signal Unit  
 32nd Transport Regiment  
5th Independent Mixed Infantry Brigade:  
 16th Independent Infantry Battalion  
 17th Independent Infantry Battalion  
 18th Independent Infantry Battalion  
 19th Independent Infantry Battalion  
 20th Independent Infantry Battalion  
 5th Independent Mixed Brigade Artillery Unit  
 5th Independent Mixed Brigade Signal Unit  
6th Independent Mixed Infantry Brigade:  
 organization unknown  
10th Independent Mixed Infantry Brigade:  
 organization unknown  
1st Army: Lt. Gen. Yoshio Shinozui (Yangchui)  
20th Division:  
 20th Infantry Group  
 78th Infantry Regiment  
 79th Infantry Regiment  
 80th Infantry Regiment  
 20th Reconnaissance Regiment  
 26th Artillery Regiment (24-75mm guns & 24-105mm how)  
 20th Engineer Regiment  
 20th Signal Unit  
 20th Transport Regiment  
26th Division:  
 11th Independent Infantry Regiment  
 12th Independent Infantry Regiment  
 13th Independent Infantry Regiment  
 26th Divisional Reconnaissance Unit  
 11th Independent Artillery Regiment (16-57mm guns,  
 4-105mm & 4-150mm howitzers)  
 26th Engineer Regiment  
 26th Signal Unit  
 26th Transport Regiment  
37th Division:  
 225th Infantry Regiment  
 226th Infantry Regiment  
 227th Infantry Regiment  
 37th Mountain Artillery Regiment  
 (36-75mm mountain guns)  
 37th Engineer Regiment  
 37th Signal Unit  
 37th Transport Regiment  
3rd Independent Mixed Infantry Brigade:  
 6th Independent Infantry Battalion  
 7th Independent Infantry Battalion  
 8th Independent Infantry Battalion  
 9th Independent Infantry Battalion  
 10th Independent Infantry Battalion  
 3rd Independent Mixed Brigade Artillery Unit  
 3rd Independent Mixed Brigade Engineer Unit

3rd Independent Mixed Brigade Signal Unit  
4th Independent Mixed Infantry Brigade:  
organization unknown  
9th Independent Mixed Infantry Brigade:  
37th Independent Infantry Battalion  
38th Independent Infantry Battalion  
39th Independent Infantry Battalion  
40th Independent Infantry Battalion  
9th Independent Mixed Brigade Artillery Unit  
9th Independent Mixed Brigade Engineer Unit  
9th Independent Mixed Brigade Signal Unit

3rd Air Brigade: (as of September 1939)

3rd Air Briagde Headquarters  
17th Independent Air Battery (KO)  
44th Air Regiment (KO)  
59th Air Regiment (OTSU)  
75th Air Regiment (HEI)  
16th Air Sector Command  
35th Airfield Battalion  
41st Airfield Battalion  
57th Airfield Battalion  
2nd Airfield Company  
69th Airfield Company  
Det/Airfield Signal Unit  
16th Air Intelligence Unit  
3rd Field Airfield Construction Unit  
9th Field Anti-aircraft Artillery Unit, 1st Division  
10th Field Anti-aircraft Artillery Unit, 1st Division  
6th Field Searchlight Unit, Guard Division

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