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THE CRIMINAL CASE OF MICHAŁ SOKOŁOWSKI: A POST-WAR RECKONING IN SANOK FOR THE DENUNCIATION OF SHELTERED JEWS AND THEIR SHELTERER*

Summary

This article investigates the criminal prosecution of Michał Sokołowski for denouncing Jews hiding in Sanok, along with the woman who helped them. It delves into the ethnic dynamics of the Sanok region before and during World War II, presents statistical data on the Jewish population's wartime losses in the occupied Sanok County, outlines the legal framework for post-war justice, offers a detailed profile of the denouncer, and analyses the circumstances surrounding his actions. The article also features Wiktoria Kopiczak (Kosar), who sheltered Jews during the war, and outlines her prosecution before the German Special Court in Rzeszów, which initially sentenced her to death – a verdict later reduced to two years' imprisonment through clemency. It further recounts the post-war trial of

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Michał Sokołowski before the Voivodeship Court in Rzeszów, culminating in a sentence of five years and one month in prison, along with a two-year revocation of his public and honorary civil rights.

Keywords

denunciation • aid to Jews • death penalty • occupation • Holocaust

Introduction

This article presents a case study focused on the wartime denunciation of Jews in hiding and the woman who sheltered them. It aims to explore the motives behind the denouncer's actions, the circumstances and consequences of the denunciation, the post-war legal proceedings that followed, and the broader context of aid extended to Jews during the Holocaust. This study draws primarily on archival materials from the 1954 criminal trial of Michał Sokołowski that was held before the Voivodeship Court in Rzeszów and preserved in the Archives of the Rzeszów Branch of the Institute of National Remembrance. These records include court and prosecutorial documents, minutes of witness and suspect interrogations, and – crucially – files from the German criminal case against Wiktoria Kopiczak, who provided shelter to Jews and was sentenced by the Special Court in Rzeszów (*Sondergericht Reichshof*) in 1944. I came across this case while researching the activity of the Rzeszów Special Court, one of the German special courts operating in the General Governorate (GG) and presented it in an outline in an article devoted to the Special Court in Rzeszów.¹ In this study, I would like to discuss it in detail. What makes this case particularly distinctive is that the act prosecuted in the post-war Polish court proceedings was dual in nature – it involved the denunciation of both Jews in hiding and the individual who sheltered them.

This text offers a concise overview of Sanok's demographic landscape on the eve of World War II and during the occupation, highlighting the transformations brought about by the imposition of the occupiers' administrative divisions. It

¹ K. Graczyk, "Z działalności Sądu Specjalnego w Rzeszowie (Sondergericht Reichshof) podczas II wojny światowej," *Acta Iuridica Resoviensia* 4 (47) (2024), pp. 55–56.

traces the tragic fate of the local Jewish community, with particular attention to key sites of their concentration and the deportations that occurred. As a contextual framework for the case study, the author draws on the scholarly classification of Polish societal attitudes toward the extermination of Jews. The next section examines the attitudes of Poles in Sanok County towards persecuted Jews, referencing specific instances of individuals who offered shelter or other forms of aid, alongside examples of hostile actions such as denunciations. It also addresses the legal foundation of the trial under discussion and interprets it in the context of Michał Sokołowski's conduct. This article proceeds to outline the life of Wiktoria Kopiczak, detailing the circumstances under which she sheltered Jews and her subsequent death sentence passed by a German special court. It concludes with an account of Michał Sokołowski's post-war trial and a reflection on the motivations behind his actions.

Sanok as a Setting of Rescue and Denunciation

The events discussed in this article unfolded in Sanok during World War II. In the interwar period, the town served as the administrative centre of Sanok County, which was part of the Lviv Voivodeship. On the eve of the war, the county's population numbered approximately 120,000, comprised of roughly 50 per cent Poles, 40 per cent Ukrainians, and 10 per cent Jews. Within the town itself, the proportion of Poles was higher – around 70 per cent – while the Jewish community numbered about 5,400 residents. Sanok – alongside Rymanów, Bukowsko, and Jaśliska – was one of the main centres of the Jewish population in the county. During the German occupation, it became the administrative seat of the Landkreis Sanok, which was part of the Cracow District within the General Governorate.² Its borders differed significantly from those of the pre-war Sanok County – the area of the Landkreis more than doubled compared to its pre-war size. According to the Main Welfare Council, in 1940, it was inhabited by approximately 247,000 people – 124,000 Poles

² C. Cyran and A. Rachwał, "Eksterminacja ludności na Sanocczyźnie w latach 1939–1944," *Rocznik Sanocki* 4 (1979), pp. 31–32; "Sanok. Szlak chasydzki," p. 8, https://www.sanok.pl/asp/pliki/zakladka_turysta_grafiki/1szlak_chasydzki_sanok_pl.pdf (accessed 2 January 2025). The author would like to thank Dr. Martyna Grądzka-Rejak and Dr. Tomasz Domański for their discussions during the work on this article.

(50.3 per cent), 113,000 Ukrainians (45.8 per cent) and 9,374 Jews (3.8 per cent).³ Detailed data for Sanok from February 1940 and March 1942 show 2,450 and 2,900 Jews, respectively, including displaced persons from the Reich, Bielsko, Biała, Cieszyn, Kraków, Łódź, Sosnowiec and Żywiec.⁴

In September 1942, the Jewish population from the Landkreis Sanok was ultimately deported. Before this, four concentration camps operated in the region – Bukowsko, Lesko, Sanok, and Ustrzyki Dolne. A ghetto was also set up in Sanok, housing an average of 250 individuals. By the time it was dismantled in February 1943, approximately 1,000 Jews had passed through it.⁵ Jews were transferred from the concentration sites to the camp in Zasław, which served as the final collection point before their deportation to the extermination camp in Bełżec.⁶

The forced labour camp in Zasław was established in the autumn of 1940 on the site of a cellulose factory under construction before the war. It operated for three years before closing. The first Jewish deportees arrived with their movable belongings, including livestock. In the summer of 1942, Jewish residents from across the Landkreis Sanok began arriving at the camp; around that time, a Jewish camp administration and a Jewish police force were established. Prisoners were used for various types of work, such as road repairs, demolition of Jewish houses, farm work and work in craft workshops. They received no pay, their food rations were meagre, and the sanitary and hygienic conditions in the camp were appalling; only some of them had shelter for the night. Prisoners stayed in the camp for a relatively short time – after just a few weeks, most of them were transported to Bełżec.⁷

On 5 September 1942, Jews were transported from Sanok to the camp in Zasław. The elderly and sick were murdered on the spot, at the Jewish cemetery in Sanok. After a few days, the first transport left Zasław for Bełżec, carrying about 4,000 people. In the summer of 1943, mass executions of Jews, Poles and Sinti took place in

³ E. Rączy, *Zagłada Żydów w dystrykcie krakowskim w latach 1939–1945*, Rzeszów, 2014, p. 72.

⁴ *Ibid.*, p. 96.

⁵ E. Rączy, “Sytuacja Żydów w powiatach leskim i sanockim w latach 1939–1942,” in J. Wallach, *Gorzka wolność: Wspomnienia ocalałej z Holocaustu*, comp. and ed. E. Rączy, Rzeszów–Warsaw, 2022, p. 23.

⁶ For more on the subject of the extermination camp in Bełżec, see R. Kuwałek, *Obóz zagłady w Bełżcu*, Lublin–Bełżec, 2005.

⁷ E. Rączy, “Sytuacja Żydów w powiatach leskim i sanockim,” pp. 23–24.

the camp. It is estimated that no fewer than 10,000 people were transported from Zasław to Bełżec to be killed, and at least 2,000 were shot in the camp itself. The camp was finally liquidated at the end of the summer of 1943. The last to be shot on the spot were members of the Judenrat and the Jewish camp police.⁸ Based on the research of Elżbieta Rączy, a scholar specialising in the extermination of Jews in the Cracow District, at least 17,240 Jews were killed in the Landkreis Sanok during Operation “Reinhardt.” Of these, 8,000 were deported to the Bełżec extermination camp, while more than 9,240 were executed by shooting.⁹

Historians identify four primary attitudes that Poles could adopt when encountering a persecuted Jew during the German occupation. The first – unequivocally negative – involved reporting the individual to the authorities, in accordance with the occupation-era laws, which typically led to the person’s death. The second was passive: choosing neither to help nor to betray. The third entailed offering one-time assistance. The fourth involved long-term care and shelter. The final two responses should be regarded as positive. As Elżbieta Rączy pointed out, most historians currently agree that the second attitude prevailed among Poles, characterised by passivity, which was due to many factors, ranging from the events of the interwar period and mutual distrust, through limited social contacts, conflicting economic interests, cultural and religious differences, to the extremely difficult living conditions that the German authorities imposed on Poles.¹⁰

The scholar also pointed out that the attitudes of the Polish population towards the extermination of Jews in the Landkreis Sanok did not differ much from those in other parts of occupied Poland.¹¹ Individual aid prevailed, provided based on a verbal agreement between the person in hiding and the person providing shelter. Usually, single individuals were hidden, as they were easier to feed and conceal. However, some families helped larger numbers of people, such as the Pырцак family (Michał, Stanisław and Stefania) from Prusiek near Sanok, who hid as many as seventeen escapees from the camp in Zasław.¹² Sometimes the aid provided was

⁸ *Ibid.*, p. 24; C. Cyran and A. Rachwał, “Eksterminacja ludności na Sanoczczyźnie,” pp. 62–69.

⁹ E. Rączy, *Zagłada Żydów*, pp. 312, 315.

¹⁰ E. Rączy, “Postawy Polaków wobec zagłady Żydów w czasie niemieckiej okupacji na przykładzie starostwa sanockiego,” *Limes. Studia i materiały z dziejów Europy Środkowo-Wschodniej* 11 (2018), p. 175.

¹¹ *Ibid.*, pp. 175, 181.

¹² *Ibid.*, pp. 177–178.

selfless, sometimes paid for, but the exact proportions cannot be determined due to a lack of sources. Jews were more often hidden in villages than in towns, because it was easier to find food and hiding places in rural areas. However, this also poses difficulties, because in the provinces – in small towns or villages – everyone knew each other well, and a new person immediately stood out and aroused interest. Another difficulty was the fact that the district was not ethnically homogeneous, and the nationality policy of the occupying authorities contributed to the intensification of the conflict between Poles and Ukrainians.¹³ It is not known how many Poles in the Landkreis Sanok helped Jews to survive. In 2018, historian Elżbieta Rączy documented that 36 Poles from the Landkreis Sanok area were recognised as Righteous Among the Nations. Through their courageous actions, 55 Jews survived. However, it should be noted that the number of those honoured constitutes only a fraction of the total number of rescuers.¹⁴ For comparison, after the war, this title was awarded to 335 residents of the western part of the Lwów Voivodeship of the Second Polish Republic, covering five Landkreis counties (Jarosław, Krosno, Przemyśl, Rzeszów, Sanok).¹⁵

The point of reference for the analysed case of denunciation should be the behaviour of several people involved in helping Jews in the Landkreis Sanok, as compiled by Elżbieta Rączy. She named, among others, Maria Bańkowska and her sister Aniela, who supplied Jews in the Sanok ghetto with food for several months; Stanisław Kawski, from whose pharmacy medicines were smuggled into the Sanok ghetto; clergyman Antoni Porębski and Maria Dżambowa's husband, whose name is unknown, who hid her (when he was arrested, his colleagues took care of her);¹⁶ Stanisław, Zofia and Władysław Stojowski from Sanok, who gave shelter to five Jews; the Baloski couple from Zagórz, who hid the Rott family; Tadeusz Srogi and Stanisław Mędryk from Sanok, who helped Tauba Felder; Zenobia and Józef Czekański from Sanok, who hid Czesław and Janina Gumkowski from Łódź;

¹³ *Ibid.*, p. 177.

¹⁴ *Ibid.*

¹⁵ E. Rączy, "Stan badań nad problematyką ratowania Żydów przez Polaków w zachodniej części województwa lwowskiego," in *Stan badań nad pomocą Żydom na ziemiach polskich pod okupacją niemiecką*, eds. T. Domański and A. Gontarek, Warsaw–Kielce, 2022, p. 409.

¹⁶ E. Rączy, *Pomoc Polaków dla ludności żydowskiej na Rzeszowszczyźnie 1939–1945*, Rzeszów, 2008, pp. 55, 57, 76, 97.

Maria Rysz and Stanisława Kornecka from Sanok, who hid Leon Feld; Aniela Puć from Zagórz, who supplied Aron and Fajga Goldman with food; Maria Huk from Sanok, who hid a man named Kupler; Wiktoria Rolnik, at whose place Dr Leon Penner, a fugitive from Zasław, later a deputy prosecutor of the Special Criminal Court in Katowice, prosecutor of the Appellate Court in Katowice, voivodeship prosecutor in Katowice and director of the Judicial Department of the General Prosecutor's Office, survived the war;¹⁷ as well as the Righteous Among the Nations: Antonina Bąk from Jurowiec near Sanok; Tomasz and Olga Bil from Bykowiec near Sanok, Stanisław Cara from Łukawica; Jan Kąkol and Magdalena Mielniczek from Bezmiechowa; Stanisława Laskowska from the village of Długie near Sanok; Miron Lisikiewicz from Lesko; the Piecuch family – Maria, Piotr and their daughter Maria from Srogów Dolny; the aforementioned Pyrcak family from Prusiek near Sanok; Jan and Aniela Raks from Zasław; the Wolański family – Stanisława, Władysław, Eugeniusz and Danuta from Jaćmierzów; Zofia Wajda-Liro from Lesko; the Woźny family – Michał, Maria and Andrzej from Markowiec near Sanok; Józef and Franciszka Zwonarz from Lesko, and Stefania, Władysław and Karol Szelka from Niebieszczany.¹⁸ This list can be supplemented based on the second volume of the publication *Relacje o pomocy udzielanej Żydom przez Polaków w latach 1939–1945* (Accounts of Assistance Provided to Jews by Poles During 1939–1945), concerning the Cracow District of the General Governorate. In relation to the wartime events in the Landkreis Sanok, the book recounts the courageous actions of several individuals. Maria, Katarzyna, and Marcin Winiarski assisted an unidentified Jewish family by providing food and hiding a cow. Anna and Franciszek Wronowski sheltered Iza and Hersz Nagelbusz for nearly a year, ultimately losing their lives due to a denunciation. Jan Joss and his wife, along with Piotr Maszczak, offered refuge to Bronisława Szwarc in their homes.¹⁹

During the German occupation, some people took heroic action and provided shelter to Jews, while others committed reprehensible acts, such as denunciation.

¹⁷ A. Dziurok, *Osądzenie przestępstw okresu II wojny światowej przez Specjalny Sąd Karny w Katowicach w latach 1945–1946*, Katowice–Warsaw, 2024, p. 72.

¹⁸ E. Rączy, "Postawy Polaków," p. 25.

¹⁹ *Relacje o pomocy udzielanej Żydom przez Polaków w latach 1939–1945*, vol. 2: *Dystrykt krakowski Generalnego Gubernatorstwa*, selec. and ed. S. Piątkowski, Lublin–Warsaw, 2020, pp. 444, 497–498, 502.

The case in question combines both types of behaviour, and the subsequent criminal case is an example of post-war reckoning and, as such, exemplifies so-called transitional justice.²⁰

It is somewhat difficult to place the analysed case of denunciation among other cases of this kind, as we do not have any statistical data in this regard. After the war, eleven people living in the Landkreis Sanok were tried for negative behaviour towards the Jews – ten Poles and one Ukrainian. The literature provides examples of such negative behaviour – the hiding of three Jews by Mikołaj Chanas in Zagórz, Samuel Pechter by Magdalena and Michał Wasser from Cisna, as well as the aforementioned Pyrcak family, all of which ended in denunciations. In the latter case, the denouncer's attention was drawn to the fact that the head of the family possessed foreign currency and had made large food purchases. Denouncers also contributed to the capture of Sara Langsam, and the Weiner and Osterjung families from Sanok.²¹

The August Decree and Its Interpretation

For historians dealing with the German occupation and legal historians, it is obvious that in Poland, the foundation for the post-war reckoning related to the attitudes and behaviour during World War II was the Decree of the Polish Committee of National Liberation of 31 August 1944 concerning “The Punishment of Fascist-Hitlerite Criminals Guilty of Murder and Ill-Treatment of the Civilian Population and Prisoners of War, and the Punishment of Traitors of the Polish Nation” (the August Decree).²² The August Decree stipulated the death penalty for murder, ill-treatment, and all forms of persecution targeting civilians and prisoners of war, as well as for denunciations made to the occupying authorities. It also prescribed imprisonment for cases of blackmail involving demands for ransom in exchange for withholding denunciation to the German authorities.²³ The basis

²⁰ For more on this topic, see M. Krotoszyński, *Modele sprawiedliwości tranzycyjnej*, Poznań, 2017.

²¹ E. Rączy, “Postawy Polaków,” pp. 178–180.

²² *Dziennik Ustaw* (hereinafter Dz.U.) 1944, no. 4, item 16; consolidated text: Dz.U. 1946, no. 69, item 377.

²³ A. Lityński, *Historia prawa Polski Ludowej*, Warsaw, 2013, p. 115; A. Lityński, *O prawie i sądach początków Polski Ludowej*, Białystok, 1999, pp. 63–64; P. Kładoczny, *Prawo jako narzędzie represji w Polsce Ludowej (1944–1956): Prawna analiza kategorii przestępstw przeciwko państwu*, Warsaw, 2004, pp. 176–180;

for its issuance was the legislator's assumption that the Criminal Code of 1932 did not provide a sufficient legal basis for the criminal assessment of the nature and scale of the crimes committed by the German occupiers during World War II. Although the decree violated the principle of *lex retro non agit* and was of low legislative quality, it was eagerly awaited by the public after six years of war.²⁴ It is estimated that between 1944 and 1960, 21,000 sentences were handed down in cases involving crimes under the August Decree.²⁵

In its original wording, the August Decree under Article 1 stipulated the death sentence for "Any person who, acting to the benefit of the German occupying authorities: (a) took part or takes part in the commission of murder of civilians or prisoners of war, in their ill-treatment or persecution, (b) acted or acts to the detriment of persons residing in the territory of the Polish State, in particular through the capture or transport of persons sought or persecuted by the occupying authorities for whatever reason." The provision required deliberate action or intent. At the beginning of 1945, this provision was edited and its wording was slightly amended: "Any person who, acting to the benefit of the German occupying authorities, acted or acts to the detriment of persons residing in the territory of the Polish State, in particular through the capture or transport of persons sought or persecuted by the occupying authorities for whatever reason (excluding the pursuit of common crimes), by their denunciation, capture or transport, shall be subject to the death penalty." Article 1 of the August Decree received its final wording in December 1946: "Any person who, acting to the benefit of the authorities of the German state or its ally: (1) took part or takes part in the commission of murder of civilians, military persons, or prisoners of war, in their ill-treatment or persecution; (2) by denunciation or capture acted to the detriment of persons

L. Kubicki, "Zbrodnie z okresu II wojny światowej w świetle prawa polskiego," in *System prawa karnego: O przestępstwach w szczególności*, vol. 4, part 1, eds. I. Andrejew, L. Kubicki, and J. Waszczyński, Wrocław-Warsaw-Cracow-Gdańsk-Łódź, 1985, pp. 153-157; L. Kubicki, *Zbrodnie wojenne w świetle prawa polskiego*, Warsaw, 1963, pp. 37, 63-67.

²⁴ R. Gieroń, *Półmrok. Procesy karne w sprawie przestępstw okupacyjnych popełnionych przez chłopów wobec Żydów w województwie krakowskim*, Cracow, 2020, pp. 84-86. In this volume, Roman Gieroń discusses how the August Decree evolved through legislative changes (*ibid.*, pp. 87-89).

²⁵ A. Kornbluth, "„Jest wielu Kainów wśród nas”. Polski wymiar sprawiedliwości a Zagłada, 1944-1956," *Zagłada Żydów. Studia i Materiały* 9 (2013), p. 161.

sought or persecuted by the authorities for political, national, religious, or racial reasons shall be subject to the death penalty.”²⁶

Several phrases used in the regulations required clarification in court practice. The concept of “taking part in the commission of murders” was understood broadly to include incitement and aiding, as well as participation in summary police courts.²⁷ In addition, judicial decisions have included in this category “not only the perpetrator’s direct actions that lead to the victims’ deaths and are closely linked to the physical act of murder, but also those acts which, although not directly causing the murder, nonetheless provide assistance or support to the principal offender.”²⁸

The August Decree used two new concepts, previously unknown in Polish criminal law – “capture” and “denunciation”. The interpretation of the first of these evolved in particular. Initially, in February 1947, the Supreme Court opted for a strict interpretation, focusing on the individual aspect of the act rather than on “participating” in the capture or denunciation. This was accompanied by an effort to limit the number of death sentences. However, representatives of the doctrine criticised this position and, under this criticism, the term “capture” began to be interpreted broadly. For example, in October 1949, the Supreme Court ruled that the term “capture” covered not only actions aimed at the actual physical capture, but also all other actions performed after the capture, aimed at handing the victim over to the occupying authority.²⁹

“Denunciation” caused fewer problems. Aside from “acting to the benefit of the authorities of the German state,” it was deemed enough to merely report a wanted or persecuted individual to the occupying forces, without regard for the consequences that might follow. It was not required that the perpetrator be directly intent on handing the person over for extermination – it was sufficient that the persons were being sought or persecuted by the Nazi authorities and that the perpetrator, by turning them in, was acting to their detriment.³⁰ A denunciation, as defined in

²⁶ A. Pasek, *Przestępstwa okupacyjne w polskim prawie karnym z lat 1944–1956*, Wrocław, 2002, pp. 73–74.

²⁷ A. Lityński, *O prawie i sądach*, p. 64.

²⁸ Judgment of the Supreme Court of 13 July 1965, ref. no. IV KR 98/65, OSNKW 1965/11/133, LEX no. 121217.

²⁹ A. Pasek, *Przestępstwa okupacyjne*, p. 76; R. Gieroń, *Półmrok*, pp. 304–306.

³⁰ A. Pasek, *Przestępstwa okupacyjne*, pp. 80–81.

Article 1(2) of the August Decree, could involve truthfully reporting someone to the occupying authorities or providing a testimony to these authorities. Such actions could also be classified as acts to the detriment under Article 2 of the same Decree.³¹ For instance, a false report to the secret state police concerning a person who actively supported the German authorities and committed offences under the August Decree does not fall within the scope of Article 1(2) of the Decree, as it lacks “the necessary conditions – either in terms of the subject matter or the status of the entity involved – that would indicate the act benefited the German state authorities.”³² A review of court practice leads to the conclusion that not every denunciation of “persons sought or persecuted by the occupying authorities for whatever reason” constituted “acting to the benefit of the authorities of the German state,” and therefore not every denunciation was punishable. An informer who – acting to the benefit of the authorities of the Third Reich or its ally – made a report to the secret state police, committed a crime under Article 1 or 2 of the August Decree, depending on its content. If the content was unknown, the act was to be classified under Article 2 of the August Decree as an act detrimental to the Polish state during the war with Germany.³³ Article 1(2) of the August Decree, as discussed above, was applied in the case of Michał Sokołowski.

The Denouncer and the Denunciation

Michał Sokołowski, born on 28 August 1911 in Sanok, held Polish citizenship and was of Polish nationality. He received no formal education and was illiterate. Beginning in 1927, he worked at the Sanok municipal office as a sewer worker, with a brief interruption for military service between 1935 and 1936. Mobilised again in September 1939, he returned from service to resume employment at the municipal office, this time as a stoker and cleaner. He married in 1936 and had two children. Following a divorce in 1945, he remarried and fathered three more children. Around that time, he also became a professional firefighter in Sanok,

³¹ Judgment of the Supreme Court of 25 November 1950, ref. no. K 1274/50, OSN(K) 1952/2/18, LEX no. 161078.

³² A. Pasek, *Przestępstwa okupacyjne*, p. 74.

³³ Judgment of the Supreme Court of 9 November 1951, ref.no. II K 308/51, OSN(K) 1952/2/17, LEX no. 161076.

a role he continued to perform until his arrest. During the post-war investigation, he stated that he came from a peasant background and was a member of the Polish United Workers' Party.³⁴

During the German occupation, Sokołowski was employed at the municipal office. In 1942, he was allocated a flat that had previously belonged to Jewish victims of the Holocaust. Faced with a monthly wage of just 15 zlotys, which was insufficient to support his family, he turned to trading goods. His merchandise included sugar, tobacco, cigarettes, lighter flints, saccharin, and bread. As a result of his unauthorised market activities in Sanok, he was repeatedly penalised by both the secret state police and the Blue Police.³⁵ He was first arrested in 1941 by the Blue Policemen and detained for five weeks for trading in tobacco. In 1943, he was arrested again for illegally storing leather for shoes, this time by criminal police officers. During a search, 20 kg of sugar, 2,000 cigarettes and 150 zlotys were found in his possession.³⁶

According to Sokołowski's account, given during the post-war investigation (in 1954 in Rzeszów), he was interrogated in German custody about the origin of the leather and other goods found. He did not want to reveal his source, so he was severely beaten and lost some of his teeth. To avoid further torture, he made up a story that he received the goods from an unknown person who was said to arrive from Cracow on Wednesdays and Fridays. For three consecutive weeks, the police took him to the railway station and the market square, where he was supposed to show them the person they were looking for. As these efforts were unsuccessful, the interrogations, accompanied by beatings, were resumed. The head of the criminal police (unfortunately, his personal details could not be established) finally abandoned the subject of the leather and, through the interpreter Stanisław Ślęzak,³⁷ offered Sokołowski his freedom on condition that he would indicate the

³⁴ *Oddziałowe Archiwum Instytutu Pamięci Narodowej w Rzeszowie* (Archives of the Institute of National Remembrance, Branch in Rzeszów, hereinafter AIPN Rz), 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 10 July 1954, pp. 22–24.

³⁵ *Ibid.*, p. 25; AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 30 August 1954, p. 29.

³⁶ AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 30 August 1954, p. 30.

³⁷ Stanisław Ślęzak, born in 1895 in Wysoka, Rzeszów County, served in the State Police from 1919 to 1939, eventually becoming head of the investigation unit at the County Police Headquarters in Sanok.

places where Jews were hiding. Sokołowski replied that he did not know of any such places, but promised to look for them, after which he was released without any formalities such as signing a cooperation agreement.³⁸

During his interrogation, Sokołowski asserted that, despite the assumed obligation, he had made no effort to search for Jews. He recounted that one of his clients, while buying bread, mentioned having seen lights on several occasions in the evenings and at night in the basement windows of a building located on what was then Adolf Hitler Street (now 3 Maja Street). Several weeks later, Sokołowski conveyed this information to Ślęzak, who subsequently prepared a memorandum dated 19 July 1943:

Michał Sokołowski, an informant residing at 17 Adolf Hitler Street in Sanok, reports that for some time, light has been observed in the basement of a tenement house located on Adolf Hitler Street, situated behind Marzyński's hairdressing salon and in the direction of Breckhod's shop. The basement in question, formerly occupied by Jews, is currently vacant. Further information may be obtained from a woman living directly opposite the building; although Sokołowski does not know her name, he is able to identify her.³⁹

This was to be his only encounter with the policeman. When asked about his motives for passing the information, Sokołowski admitted that he had hoped the goods disclosed and seized during the search would be returned to him, but they

During the German occupation, he continued his service in the criminal police. In 1953, the Voivodeship Court in Rzeszów sentenced him to two years in prison for his role – between 1927 and 1935 in Sanok – as police station commander and later as a member of the county investigation unit, in the persecution of individuals affiliated with the Communist Party of Poland (*Komunistyczna Partia Polski*) and the Polish Socialist Party – Left (*Polska Partia Socjalistyczna – Lewica*), who had been arrested for their political activities (*Archiwum Instytutu Pamięci Narodowej* [Archives of the Institute of National Remembrance in Warsaw, hereinafter AIPN], 0298/559, vol. 5, Report on the authorisation to initiate a registry case-file against Stanisław Ślęzak, dated 28 March 1952, p. 74; AIPN, 0298/559, Application for permission to arrest Stanisław Ślęzak, dated 22 September 1952, pp. 85–86; AIPN Rz, 052/221, Judgment of the Voivodeship Court in Rzeszów in a criminal case against Stanisław Ślęzak of 21 July 1953, p. 4).

³⁸ AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 31 August 1954, pp. 32–33.

³⁹ AIPN Rz, 358/161, Copy of a police memo dated 19 July 1943, p. 79. Punctuation in the quotation has been corrected, and abbreviations have been expanded.

were not.⁴⁰ The day after passing on the information, Sokołowski learned at the market that criminal police officers had caught Jews at the location he had indicated.⁴¹ He denied receiving any remuneration for denouncing them.⁴² When asked about Gestapo collaborators in Sanok and their whereabouts, Sokołowski named three people who denounced Jews. He had personally witnessed the shameful activity of one of them:

I knew a few people who worked with the criminal police, turning Jews in – I even saw it happen myself. One time, Słysz came by my place to buy cigarettes. While we were chatting, he mentioned that some Jews were hiding in his building. I told him, “You should get down to some work and stop worrying about the Jews.” A couple of hours later, I saw him walking with three Gestapo officers toward his building. About half an hour after that, they came out with the Wajner family. I would like to point out that Słysz is currently in prison.⁴³

Regarding the credibility of Sokołowski’s explanations, which he gave as a suspect, I would like to point out that he was an uneducated, illiterate man who was intensively interrogated for several days about various circumstances by different interrogators, who repeatedly asked him about the same things, presumably in an attempt to detect any possible lies. Despite this, he changed his explanations only once – they concerned his alleged conviction by a court for trading and a six-month sentence served.⁴⁴ After the interrogator asked again about the length of his sentence and how much of it he had served, he quickly corrected his answer and admitted that his earlier statements – made in an at-

⁴⁰ AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 31 August 1954, p. 33; AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 2 September 1952, pp. 39–40.

⁴¹ AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 4 September 1954, p. 41.

⁴² AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 8 September 1954, p. 49.

⁴³ AIPN Rz, 358/161, p. 50. Unfortunately, checking these names in terms of post-war criminal liability yielded negative results.

⁴⁴ AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 30 August 1954, p. 30.

tempt to defend himself – were not true.⁴⁵ The critical analysis of the source does not provide sufficient grounds to doubt the accuracy of his account. Furthermore, in post-war criminal proceedings against Sanok residents for actions harmful to civilians, Sokołowski's name does not appear among those identified as informants for the German police.⁴⁶ On this basis, I indirectly conclude that his cooperation with the police was, as he himself stated, incidental rather than permanent. In my opinion, this is a relevant issue, as it minimises or even excludes the possibility of Sokołowski committing other offences within the meaning of the August Decree.

Victims of the Denunciation

Wiktoria Kopiczak (after the war, she married and changed her surname to Kosar), a Polish woman who provided aid and shelter to the aforementioned Jews, was born in 1900 in Grabówka, Brzozów County. She completed five years of elementary school, did not learn any profession, and initially worked on a farm. Subsequently, for 12 years – until 1939 – she was employed as a domestic worker by Sara Wenig, a Jewish woman who owned a delicatessen shop.

Wenig owned two houses in Sanok, the smaller of which, consisting of two rooms and two kitchens, she transferred to a Polish woman shortly after the German invasion. In 1942, Sara Wenig's son, Eisig, prepared a hiding place for himself in this house. When Jews were deported from Sanok in September 1942, Eisig Wenig and his sister Ida Schreiber fled and turned to Kopiczak for help. She took them in, and they stayed with her for a total of eleven months, until they were caught by the criminal police in July 1943. The Jews hid in a room specially prepared for this purpose – a pantry (a cellar) attached to the house. The entrance to the pantry was in the kitchen, occupied by a Polish woman, and was blocked by a wardrobe. The woman bought food partly with money received from the Jews and partly with her own funds.

⁴⁵ AIPN Rz, 358/161, Minutes of the interrogation of the suspect Michał Sokołowski of 1 September 1954, p. 37.

⁴⁶ For example, AIPN Rz, 00141/534/J, Minutes of the interrogation of the witness Józef Kubiak of 5 April 1950, pp. 6–7; AIPN Rz, 00141/534/J, Handwritten copy of the testimony of Józef Kubiak, an SD agent arrested in Sanok, August 1950, pp. 46–47.

On that fateful day, Kopiczak – according to her own account – returned from work after dark (she was looking after her neighbours’ children), and as soon as she entered the flat, Eisig Wenig moved the wardrobe aside and stood in the kitchen. He said someone was walking around the house, and it was probably the criminal police. The woman returned to her neighbour, Janina Lurska, whose children she was looking after. An hour later, a policeman arrived at Lurska’s flat and demanded that the cellar be opened. At Lurska’s request, Kopiczak took the keys and went to open the door. The policeman pointed to her flat. After opening the door, five policemen entered. They proceeded straight to the wardrobe, shifted it aside, and pulled out Ida Schreiber and Eisig Wenig – then began beating them. Eisig Wenig managed to take advantage of the police officers’ inattention and escaped, but two days later, he was shot dead by functionaries of the *Polnische Polizei*.⁴⁷ The police officers took Schreiber and Kopiczak to the prison in Sanok. The women spent five weeks in the same cell. After that time, the Jewish woman was shot,⁴⁸ while the Polish woman was indicted by the Special Court in Rzeszów in December 1943. The case files have been preserved and were included in the evidence in the post-war criminal trial against Sokołowski so that certain conclusions can be drawn on their basis.

The German criminal case files contain several notable documents, including a police memo originally written in Polish based on Sokołowski’s oral report, its German translation, and admission orders to the security police prison in Sanok dated 20 July 1943, issued for 52-year-old Ida Schreiber and 43-year-old Wiktoria Kopiczak.⁴⁹ The latter was interrogated on the same day and provided more details about the case we are interested in.

Based on the explanations given, the following Jews arrived at Kopiczak’s flat in September 1942: Ida Schreiber, Eisig Wenig, and a man named Lerner with his wife. They begged her earnestly for hospitality, promising high remuneration after the war and financing her current needs until its end. The Polish woman refused,

⁴⁷ AIPN Rz, 358/161, Official note dated 21 July 1943, p. 197. For more on the attitude of the Polish Blue Police towards the Holocaust, see T. Frydel, “Zwykła organizacja, nadzwyczajna przemoc państwowa. Polska policja granatowa a Zagłada we wschodniej części dystryktu krakowskiego,” *Zagłada Żydów. Studia i Materiały* 17 (2021), pp. 99–134.

⁴⁸ AIPN Rz, 358/161, Minutes of the interrogation of the witness Wiktoria Kosar of 13 October 1954, pp. 75–76.

⁴⁹ *Ibid.*, *Aufnahmebefehl vom 20 VII 1943*, pp. 180–181.

stating that if they stayed with her, she would leave. That day, the Jews left the flat by climbing out of the window. Shortly afterwards, the Lerner were arrested by the police, while Schreiber and Wenig escaped. About two days later, Schreiber and Wenig knocked on the Polish woman's door again, asking for food and promising to leave later. Kopiczak, who had worked as a maid for the Jewish family for twelve years, was overcome with compassion and opened the door. The two of them began pleading with her to let them stay, promising to cover all expenses and assuring her that the situation would not last long – that things might soon change.⁵⁰ The Polish woman agreed, and the Jews occupied a small room, where the police later found them. According to her explanations, the woman did not charge them for shelter and used the money she received to buy food. The Jews cooked for themselves.

After listening to Kopiczak's free narrative testimony concerning the circumstances surrounding the hiding of Jews, the interrogator asked her about the possessions, valuables and money held by the Jews, as well as whether she knew that there was a penalty for "giving shelter to Jews." Kopiczak replied that the Jews had brought their belongings to the flat even before the issuance of the evacuation order for Sanok. She was unable to confirm whether these possessions included valuables or money, nor could she specify any amounts. She only knew about silver candlesticks, glasses, knives and forks. She also admitted that she was aware of the punishment for sheltering Jews.⁵¹

Ida Schreiber was interrogated on the same day. Her account differed in minor details. During the deportation, in addition to the Lerner, Wenig and Schreiber, the siblings' mother, Sara Wenig, also approached Kopiczak. After initially refusing, the Polish woman took them in for three days. After that time, everyone left her flat – the Lerner and Sara Wenig were subsequently arrested, while Eisig Wenig and Ida Schreiber managed to escape towards the village of Olchowce,

⁵⁰ These statements may reflect a significant degree of naivety or suggest the influence of rumours circulating among the population. Jafa Wallach observed that Jews were inclined to believe any "good news" that surfaced. For example, rumours spread that German forces were hastily retreating from the Eastern Front and that the war would end within days, or that portraits of Adolf Hitler had been removed from railway station walls – interpreted as signs of a revolution in Germany or the imminent end of the war. In each instance, these reports were ultimately proven false (J. Wallach, *Gorzka wolność*, pp. 62, 69).

⁵¹ AIPN Rz, 358/161, Vernehmungprotokoll der Wiktoria Kopiczak vom 20 VII 1943, p. 185.

located east of Sanok. After several days of wandering around the fields, Schreiber returned to the flat and again asked Kopiczak to hide her. Shortly afterwards, her brother joined her. Schreiber reported that she gave the Polish woman money for food, newspapers, and tobacco, but not as payment for her help and shelter. She described in detail her own financial resources and valuables, including jewellery.⁵² She acknowledged that, before her deportation, she had entrusted various items – including pillows and clothing – to several individuals for safekeeping. The police subsequently searched these individuals' homes and sequestered these items.⁵³

The list of material evidence shows that at the time of her arrest, Schreiber had 26 dollars and 600 zlotys on her, as well as a man's pocket watch. In addition, many items were seized in her case, including women's and men's clothing, approximately 4 kg of wheat, a sewing machine and almost 4 kg of silver tableware.⁵⁴ The cellar where she was hiding with her brother was searched, and jewellery belonging to Eisig Wenig was found, including a gold bracelet, four gold rings, a gold dental crown and a silver cigarette case.⁵⁵ Items confiscated from Jews were partially transferred to the criminal police headquarters in Cracow – specifically jewellery – while other belongings, such as clothing, tableware, and similar goods, were designated as Jewish property and issued to the starost in Sanok.⁵⁶ In the summary police report, Kopiczak was accused of hiding Jews from September 1942 to 19 July 1943, as well as being Eisig Wenig's lover and “deserving the most severe punishment.”⁵⁷ Interestingly, in the German version of the report, sentences referring to the sexual aspect and the severity of the punishment were underlined in pencil.⁵⁸

Dr Stepan Wytwycki, a defence counsel from Sanok, undertook the Polish woman's defence.⁵⁹ The indictment against Kopiczak, which was just over a page long, was submitted to the Special Court in Rzeszów on 23 December 1943.⁶⁰ It included a charge of knowingly providing shelter to Jews outside the designated

⁵² *Ibid.*, Vernehmungprotokoll der Ida Schreiber vom 20 VII 1943, pp. 189–190.

⁵³ *Ibid.*, Search and sequestration report of 22 July 1943, pp. 200–201.

⁵⁴ *Ibid.*, List of material evidence from 20 July 1943, pp. 191–193, 195–196.

⁵⁵ *Ibid.*, List of material evidence from 20 July 1943, p. 197.

⁵⁶ *Ibid.*, Notiz des Kriminalkommissariats in Sanok vom 26 XI 1943, p. 219.

⁵⁷ *Ibid.*, Report of 23 July 1943, pp. 206–208.

⁵⁸ *Ibid.*, Bericht vom 23 VII 1943, pp. 209–211.

⁵⁹ *Ibid.*, Vollmacht vom 7 X 1943, p. 224.

⁶⁰ *Ibid.*, Anklageschrift vom 15 XII 1943, pp. 222–223.

Jewish residential quarter, in Sanok, between September 1942 and July 1943. The act was classified under Article 4b of the Third General Governorate Residence Restriction of 15 October 1941, in conjunction with the Police Regulation of 10 November 1943 on the Establishment of Jewish Residential Quarters in the Districts of Radom, Cracow, and Galicia.⁶¹

The hearing took place in Sanok on 24 February 1944 and lasted less than an hour and a half. The case was heard before the Special Court in Rzeszów by the following panel: District Court (*Landgericht*) Director Ernst Pooth served as presiding judge, with Regional Court (*Amtsgericht*) Councillor Heinrich Stümpel and Judge Dr Otto Woltereck acting as associate judges. Senior Prosecutor Dr Rudi Naumann participated in the proceedings, and Bailiff Hagelstein was responsible for recording the minutes. The Sondergericht Reichshof sentenced the Polish woman to death, attributing to her the act described in the indictment. In the grounds for judgment, it was noted that she did not act out of greed, which was probably taken into account later, during the pardon proceedings, which ended with the sentence being commuted to two years' imprisonment.⁶²

Unfortunately, due to a lack of sources, I was unable to present the circumstances surrounding the decision to exercise the right of clemency. Kopiczak lived to see the arrival of the Red Army. After getting married, now as Wiktoria Kosar, she testified in the post-war trial against Sokołowski, even though she did not know him at all. Neither her maiden name nor her married name appears among the

⁶¹ Dritte Verordnung über Aufenthaltsbeschränkungen im Generalgouvernement vom 15. Oktober 1941, *Verordnungsblatt für das Generalgouvernement* 1941, no. 99, p. 595. Article 4b of the Third Residence Restriction Regulation read as follows: "(1) Jews who leave their designated quarter without authorisation are liable to the death penalty. Anyone who knowingly hides Jews shall be subject to the same penalty. (2) Inciters and helpers shall be punished in the same way as the perpetrator; an attempted act shall be punished as an accomplished act. In milder cases, heavy imprisonment or prison may be adjudicated. (3) Sentencing shall be carried out by the Special Courts." For more on the practice of applying the Third General Governorate Residence Restriction Regulation, see J. Vöcker, "Criminality in the Face of Life and Death: Crime and Criminal Prosecution as a Part of Everyday Life in Warsaw Ghetto," *Zeitschrift für Ostmitteleuropa-Forschung* 71 (2022), pp. 201–234; K. Graczyk, "Die dritte Verordnung über Aufenthaltsbeschränkungen im Generalgouvernement vom 15. Oktober 1941. Entscheidungen der Staatsanwaltschaft und der Sondergerichte zum unbefugten Verlassen eines jüdischen Wohnbezirks," *Journal on European History of Law* 2 (15) (2024), pp. 42–54; A. Bartnicka and K. Graczyk, "In the Majesty of the Law? Jewish Residents of Warsaw in the Face of German Occupation Ordinances and Activities of Sondergericht Warschau – Part II," *Miscellanea Historico-Iuridica* 2 (23) (2024), pp. 517–544; K. Graczyk, *Niemieckie sądy specjalne w Generalnym Gubernatorstwie 1939–1945*, Warsaw, 2025, pp. 265–313.

⁶² AIPN Rz, 358/161, Urteil in der Strafsache gegen Wiktoria Kopiczak vom 24 II 1944, pp. 238–240.

recipients of a medal of the Righteous Among the Nations. The above case of repression for helping the Jewish population has not yet been described in literature, in particular it has not been included in the following publications: *Rejestr faktów represji na obywatelach polskich za pomoc ludności żydowskiej w okresie II wojny światowej* (Register of Acts of Repression Against Polish Citizens for Aiding the Jewish Population During World War II),⁶³ *Relacje o pomocy udzielanej Żydom przez Polaków w latach 1939–1945* (Accounts of Assistance Provided to Jews by Poles During 1939–1945),⁶⁴ and *Represje za pomoc Żydom na okupowanych ziemiach polskich w czasie II wojny światowej* (Sanctions for Aiding Jews in Occupied Polish Territories During World War II).⁶⁵

The Criminal Trial of Michał Sokołowski

In August 1954, Sokołowski was arrested, and from then on, legal proceedings involving him continued, the essence of which has been discussed above. In mid-October 1954, the investigation against him was completed, and Sokołowski did not request any further investigation. At that time, the investigating officer of the Voivodeship Public Security Department in Rzeszów, Warrant Officer Julian Koziół, drew up an indictment. Sokołowski was accused of:

On 19 July 1943, in Sanok, acting to the benefit of the authorities of the German state as a criminal police informant, he denounced the place of hiding of Ida Schreiber and Eisig Wenig, who were persecuted for national and racial reasons. As a result of this denunciation, they were captured and executed by shooting. At the same time, he caused the capture and detention of Wiktoria Kosar, who had been sheltering Ida Schreiber and Wenig in her home. She was subsequently sentenced to death by a German summary court for providing aid to persons of Jewish nationality.⁶⁶

⁶³ *Rejestr faktów represji na obywatelach polskich za pomoc ludności żydowskiej w okresie II wojny światowej*, eds. A. Namysło and G. Berendt, Warsaw, 2014.

⁶⁴ *Relacje o pomocy udzielanej Żydom przez Polaków*.

⁶⁵ *Represje za pomoc Żydom na okupowanych ziemiach polskich w czasie II wojny światowej*, vol. 1, eds. M. Grądzka-Rejak and A. Namysło, Warsaw, 2019.

⁶⁶ AIPN Rz, 358/161, Act of indictment against Michał Sokołowski of 16 October 1954, pp. 88–91. In the indictment, due to a faulty translation from German, the incorrect name of the Special Court in Rzeszów was repeated, describing it as a summary court.

This deed was classified under Article 1(2) of the August Decree. In accordance with the procedure at the time, the indictment was approved by the prosecutor of the Voivodeship Prosecutor's Office in Rzeszów and then sent to the Voivodeship Court in Rzeszów.⁶⁷

The defence was undertaken by Józef Szczepanik, a defence counsel from Rzeszów. He requested that several witnesses be heard who were to testify about the defendant's reliable fulfilment of his professional and civic duties, his hostile attitude towards the occupiers, and his involvement in illegal trade during the occupation, for which he was arrested and forced to agree to inform on others in exchange for his freedom. This request was partially granted. It was rejected insofar as it coincided with the testimony of other witnesses.⁶⁸

The hearing before the Voivodeship Court in Rzeszów, convened in a panel composed of Judge Marian Toczyński as presiding judge and lay judges Amelia Jamróz and Ludwik Kotula, took place on 26 November 1954. The proceedings were attended by Aleksander Jędras, Voivodeship Prosecutor in Rzeszów, and Court Clerk Bronisław Barłowski. Upon presentation of the evidence, the prosecution upheld the indictment in full and requested the imposition of a severe penalty, whilst the defence petitioned for a reclassification of the offence under Article 2 of the August Decree⁶⁹ and the imposition of the most lenient punishment. In his final statement, the defendant agreed with the defence counsel's position.⁷⁰

The court found Sokołowski guilty of the offence as charged, except that he was not deemed to have acted as an informer for the criminal police. He was sentenced to five years and one month of imprisonment, along with the forfeiture of his public and honorary civil rights for two years. The modification of the factual findings relative to the indictment was presumably influenced by the testimony of

⁶⁷ AIPN Rz, 358/161, Decision on temporary detention of 5 August 1954, p. 15; *ibid.*, Decision to close the investigation of 16 October 1954, pp. 83–84; *ibid.*, Report concerning the suspect's review of investigative materials dated 18 October 1954, p. 87.

⁶⁸ AIPN Rz, 358/161, Request for evidence of 5 November 1954, p. 100; *ibid.*, Decision of 5 November 1954, p. 102.

⁶⁹ Article 2 of the August Decree reads as follows: "Any person who, acting to the benefit of the authorities of the German state or its ally, acted to the detriment of the Polish State, a Polish legal entity, civilians, military persons, or prisoners of war – under circumstances other than those specified in Article 1 – shall be subject to a penalty of imprisonment for no less than three years, life imprisonment, or the death penalty."

⁷⁰ AIPN Rz, 358/161, Minutes of the main hearing of 26 November 1954, pp. 131–139.

Stanisław Ślęzak, who stated that reports submitted by informers were not signed with their real names but with pseudonyms. Consequently, Sokołowski was not classified as a formal informer, but rather as an “ordinary” informant.⁷¹ His act was classified under Article 1(2) of the August Decree, that is in accordance with the indictment. The court refrained from imposing the death penalty, exercising its discretion to apply extraordinary mitigation of the sentence. This decision was based on several extenuating circumstances, including the defendant’s lack of prior criminal record, limited education, documented assistance to the Jewish population during the occupation, working-class background, severe material hardship experienced during the war, and the strain of providing for a large family.⁷²

The sentence was set to run from 26 November 1954 to 5 September 1959. The defendant was initially incarcerated in Rzeszów and subsequently transferred to Wiśnicz. In April 1956, he was granted amnesty, resulting in a reduction of his prison term to two years, six months, and fifteen days, and the forfeiture of his public and honorary civil rights for one year. In July 1956, Sokołowski was released on parole.⁷³

Conclusion

The motives of Kopiczak (Kosar) and Sokołowski deserve closer attention. In offering shelter, the woman was driven by humanitarian reasons and a sense of gratitude towards her former employers. Her relationship with Eisig Wenig may also have played a role – though likely a secondary one, since she never mentioned it – as did the promise of payment after the war. As Elżbieta Rączy points out, pre-war acquaintance was the most common reason Poles helped Jews, and Kopiczak’s (Kosar’s) case fits that pattern.⁷⁴

Although Sokołowski cannot be classified as an extortioner, since his actions were not driven by greed or an intent to blackmail, he nonetheless proved to be a damaging denouncer. According to the findings of the aforementioned scholar,

⁷¹ *Ibid.*, p. 136.

⁷² AIPN Rz, 358/161, Judgment of the Voivodeship Court in Rzeszów in the case of Michał Sokołowski of 26 November 1954, pp. 142–144.

⁷³ AIPN Rz, 358/161, Decision of the Voivodeship Prosecutor in Poznań of 30 April 1956, p. 166; *ibidem*, Decision of the Voivodeship Court in Rzeszów of 18 July 1956, p. 169.

⁷⁴ E. Rączy, *Zagłada Żydów*, p. 101.

denunciation accounted for half of the cases in which Jews in hiding were exposed in the Rzeszów region.⁷⁵ The tragic death of Jews arrested after being denounced, and the sentencing of a Polish woman to death, were probably the outcome of Sokołowski's primitivism and intellectual limitations. Fear may have been a subjective factor influencing his attitude. Sokołowski was probably afraid of further interrogations combined with the use of coercive measures, which motivated him to denounce the Jews – an act that, in his perception, removed the personal threat to himself. In legal terms, Sokołowski acted with conditional intent; by making the denunciation, he sought to fulfil the agreements made under duress with the German police. However, his actions can be described as harmful overzealousness, as it does not appear that Sokołowski would have been punished for failing to report the incident. From this point of view, his conviction was entirely justified. It may constitute a typical example of subsumption under Article 1(2) of the August Decree.

⁷⁵ *Ibid.*, pp. 112–113.

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