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17 SUPERIOR COURT OF CALIFORNIA  
18 COUNTY OF SANTA CLARA  
19 (Unlimited Jurisdiction)

20 WEICHIAO KU and PI-LIEN KUO; ) Case number: 21-CV-376210  
21 )  
22 Plaintiff, ) DECLARATION OF YANG CHI LEE  
23 )  
24 v. )  
25 )  
26 HARALD HERCHEN; and DOES 1 )  
27 through 40, inclusive; )  
28 )  
29 Defendants. )  
30 \_\_\_\_\_ )

31 I, Yang Chi Lee declare:

32 1. I am the Director of the International Criminal Affairs for The  
33 Criminal Investigation Bureau, Taiwan's National Police Agency. In  
34 Taiwan this agency is roughly the equivalent of the American Federal  
35 Bureau of Investigation. I have been employed by the Criminal  
36 Investigation Bureau for twenty (20) years and have been a law  
37 enforcement officer for twenty-five (25) years. The facts contained  
38 within this declaration are true and of my own personal knowledge

1  
2 except those statements made pursuant to my information and belief  
3 and as to those statements, I believe them to be true.

4 2. I am the supervisor of Li Tsung Su who is the lead investigator  
5 for the Alice Ku case (Homicide Case Number 109 037278). As such I  
6 am aware of and responsible for every aspect of this investigation.  
7 Based on our investigation we have determined that:

8 a). Alice Ku and her husband Harald Herchen (The Defendant)  
9 arrived in Taiwan on November 24, 2019. From November 24, 2019  
10 through November 26, 2019, Alice Ku communicated with her sister  
11 Josephine Ku, daily, through SMS text. Alice Ku last communicated  
12 with her family on November 27. The Defendant left Taiwan alone and  
13 without Alice Ku on December 1, 2019 and returned to the United  
14 States.

15 b). The Defendant claims to have taken Alice Ku to the Hualien  
16 train station on November 29, 2019. Our investigation determined  
17 that the signals for Alice's cellular telephone appear in Hualien  
18 but do not appear near the train station at that time. Alice Ku's  
19 internet login history of her email reveals an abrupt stop on  
20 November 29, 2019 which is inconsistent with her usage pattern.

21 c). The Defendant claims to have received an email from Alice  
22 Ku that is date and time stamped November 29, 3:01 p.m. which he  
23 states was actually sent on November 30 at 10:01 a.m. The email  
24 purportedly from Alice Ku, asks the Defendant to change Alice Ku's  
25 flight back to the United States one week later than scheduled. The  
26 Defendant claims this email was sent from Alice Ku's parent's home  
27 in Yangmei, which is over a hundred miles from Hualien. The Google

1 records establish that this email was from the hotel in Hualien  
2 where the Defendant was staying at the time the email was sent.

3 3. We have determined, based on our investigation including the  
4 above referenced facts, that: Alice Ku is dead and is the victim of  
5 a homicide; That Alice Ku was killed on or before November 29, 2019  
6 and that the Defendant Harald Herchen is a suspect in that homicide.

7 4. Given the critical inconsistencies between the evidence we have  
8 collected and the Defendant's statements, suspicious behavior and  
9 testimony under oath, we issued a warrant on December 28, 2020 for  
10 the Defendant in the homicide case. The warrant remains outstanding  
11 and the defendant is wanted for questioning due to his involvement  
12 and his absence in Taiwan court. We continue to investigate this  
13 case through information provided by foreign law enforcement  
14 including the FBI which has been actively assisting us and the  
15 American Institute in Taiwan (the de facto United States embassy in  
16 Taiwan).

17 I declare under the penalty of perjury pursuant to the laws of  
18 the State of California that the foregoing declaration is true and  
19 correct. If called as a witness I could and would testify  
20 competently thereto.

21  
22 Executed on November 22, 2022 at Taipei, Taiwan.

23  
24 2022.11.22 Yang Chi Lee  
25 Yang Chi Lee  
26 declarant  
27  
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