I, Eric Wakin, do hereby attest as follows:

1. I am the Director of Library & Archives with the Hoover Institution at Stanford University (“Hoover”). I make this declaration based upon my own personal knowledge and based upon the business records of Hoover and Stanford University (“Stanford”), and if called as a witness, I could and would testify competently thereto.
2. “Hoover” or the “Hoover Institution” is part of Stanford University.

3. I received a BA in English Literature from Columbia University; an MA in Southeast Asian studies and an MA in Political Science from the University of Michigan; and a PhD in History from Columbia University.

4. I am familiar with the policies and practices of the Library & Archives at Hoover and have helped in the creation of some of them. With others, I am responsible for the implementation of such policies and practices.

5. I manage and supervise the activities of the staff at the Library & Archives at Hoover.

6. In my role at Hoover I am familiar with the administration and handling of the materials deposited by Chiang Fang Chi-yi (“the Deposit”). Originally these materials were received in 51 boxes and two bags; they have since been partially re-housed and are now in over 50 boxes.

THE CHIANG DEPOSIT

7. The Deposit includes the diaries and personal papers of two Presidents of the Republic of China (“Taiwan”) – Chiang Kai-shek and Chiang Ching-kuo.

8. The Deposit also includes other papers related to the Presidencies of Chiang Kai-shek and Chiang Ching-kuo.

9. The Deposit was originally deposited at Hoover in 2004 by defendant Chiang Fang Chi-yi.

10. Consistent with the agreement between Hoover and Ms. Chiang, Hoover has facilitated the scholarly study of redacted copies of the diaries of Chiang Kai-shek (part of the Deposit) for thousands of times for different scholars, students or persons.

11. During any given month, many people come to Hoover for the specific purpose of studying these diaries.

12. Hoover has been very proud, and humbled, in its role of disseminating this knowledge to the world.
13. The Deposit is currently being stored in over 50 archivally safe boxes in a vault at Stanford.

14. Only limited staff has access to the vault in which the Deposit is being stored.

15. Throughout the entire period that the Deposit has been at Hoover, Hoover has respected the value of the Deposit and complied with instructions received from defendant Chiang Fang Chi-yi regarding making available for scholarly study and review the various materials in the Deposit.

The Defendants

16. The Defendants are persons who have claimed to Hoover that they are descendants of either Chiang Kai-shek or Chiang Ching-kuo.


18. During its attempts to resolve this matter prior to the filing of this Interpleader, Hoover has met and has had email correspondence with defendant Chiang Yo-sung, who has claimed in writing to Hoover that he is authorized to speak on behalf of his mother and sister.

19. Hoover has an email address for defendant Chiang Yo-sung, but no physical address.

20. Hoover has no contact information for defendants Chiang Tsai Hui-mei or Chiang Yo-lan.

21. I am aware of some of the history of the Republic of China – and the importance of the Chiang and Soong families. Soong May-ling is oft referred to as
Madame Chiang and was married to Chiang Kai-shek for many years. The friendship and relationship between the Chiang and Soong families spread over many generations.

22. I have met and discussed this matter with Leo Soong, nephew of Soong May-ling and a representative for the Chiang family, many times. Mr. Soong, a resident of Walnut Creek, California, is a Stanford graduate and a co-founder of the Crystal Geyser Water Company. Shirley Soong, Leo Soong’s wife, has been a person designated by Chiang Fang Chi-yi to redact the Chiang diaries, at Hoover, prior to their release to the public.

23. Hoover has been informed by Leo Soong that Chiang Tsai Hui-mei, Chiang Yo-lan, and Chiang Yo-sung are represented by counsel -- a Mr. Nathan Kaiser of the Eiger Law law firm in Taipei.

24. Leo Soong has stated to Hoover, on numerous occasions, that he has discussed this litigation with Chiang Fang Chi-yi.

25. Chiang Hsiao-yung, the third son of Chiang Ching-kuo, passed away in 1996, and is survived by his widow defendant Chiang Fang Chi-yi and his three sons, defendants Chiang Yo-bo, Chiang Yo-chang, and Chiang Yo-ching, all of whom presently live in Taiwan.

26. Over the years, Hoover has had many communications with Chiang Fang Chi-yi.

27. During its attempt to resolve this dispute prior to the filing of this action, Hoover met with Chiang Fang Chi-yi, Chiang Yo-bo, and Chiang Yo-chang. Hoover has telephone numbers and email addresses for Chiang Fang Chi-yi and Chiang Yo-bo, but no physical addresses for them.

28. Because of her status regarding the Deposit, Hoover directly emailed the Interpleader to Chiang Fang Chi-yi and her representative Mr. Leo Soong. Mr. Soong responded to these papers with several questions – purportedly on behalf of Chiang Fang Chi-yi. Since the filing of this Action, Leo Soong has corresponded with Hoover about the Action on multiple occasions.
29. However, when Hoover addressed the issue of service with Leo Soong, he responded "I said I would offer you no help to serve your papers."

30. During litigation in 2011 in Taipei between defendants Chiang Fang Chi-yi and Chiang Yo-mei, Hoover was copied on correspondence from Jones Day, as attorneys on behalf of Chen Yaoguang.

31. Chen Yaoguang claimed to be the adopted daughter of Chiang Kai-shek and Chen Jieru, the second wife of Chiang Kai-shek. Hoover could not verify the validity of this claim, but does believe that there was a basis in fact for the claim.

32. Hoover had been informed, by Leo Soong and others, that the Academia Historica in Taiwan may claim ownership to part of the Deposit. Academia Historica is Taiwan's national organization tasked with affairs related to the nation's history, and has as its core task the compilation of that history.

33. Hoover met in person with the Director of the Academia Historica and then sent two letters to the Director of the Academia Historica to determine whether it would make a claim to ownership of any part of the Deposit. Despite these efforts, Academia Historica has never confirmed to Hoover that it claimed ownership to any part of the Deposit.

34. I attach as Exhibit A, a chart summarizing the relevant members of the Chiang Kai-shek family tree, including the named Defendants, and the status of their service.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 8th day of January, 2014 at __________________, California.

________________________
Eric Wakin
EXHIBIT A