

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

DEBI A. BOLING, a single person,)
) No. CIV 88-0228 PHX WPC
)
) Plaintiff,)
) AFFIDAVIT OF
) YUNG YEUAN CHEN
)
) v.)
)
) THE SUNRIDER CORPORATION, a)
) foreign corporation; d/b/a)
) SUNRIDER INTERNATIONAL; VITALITE)
) and SUNERGY, divisions thereof,)
)
) Defendants.)

STATE OF UTAH)
) : ss
) COUNTY OF SALT LAKE)

YUNG YEUAN CHEN, being first duly sworn, deposes and
says:

1. I am the father of Tei Fu Chen who is the head of Sunrider Corporation, d/b/a Sunrider International. I reside in Orem, Utah where Sunrider began business in the early 1980's. I helped provide funds for the start of Sunrider.
2. Tei Fu Chen was born on April 19, 1948, in the town of Po'-Tzu, Taiwan.
3. My family lived with my father at that time until Tei Fu Chen was approximately three years old.

4. After that, we moved to Chia-I, Taiwan. Chia-I is approximately 12 miles from Po'-Tzu.

5. Tei Fu Chen was not born into poverty. We lived in a middle class area, and I was always able to easily provide food, shelter, clothing and schooling for my children, including Tei Fu Chen.

6. Tei Fu Chen was not a weak, sickly child. He was healthy and active. He did not suffer from allergies, other than an occasional stuffy nose during junior high.

7. To my knowledge my grandfather and Tei Fu Chen's great-grandfather was not a prominent medical or herbal doctor.

8. My father and Tei Fu Chen's grandfather was a craftsman who built and sold horse and cow-drawn carts and wagons.

9. My father was not a physician or herbalist. My father did not own an herbal shop. My father did not provide herbs to others. My father did not provide Tei Fu Chen with any extensive training in or about herbs. Tei Fu Chen did not study at my father's side by candlelight. Tei Fu Chen did not study about herbs with my father for 12 years. Tei Fu Chen never spent any significant amounts of time with my father.

10. My father did not have in his possession a collection of ancient Chinese manuscripts containing formulations for herb products. If he had such a collection, he would have told me and shown the collection to me.

11. While Tei Fu Chen was growing up, I never observed him studying manuscripts containing herbal formulations, nor did I otherwise observe him conducting experiments or studies regarding herbs.

12. I have no knowledge that my son was ever the Kung Fu champion of Taiwan, although I am aware that he is skilled in the martial arts. To my knowledge, Tei Fu Chen became actively involved in studying martial arts after he graduated from high school and the two to three year period before he was accepted into Kaoshiung Medical College in Pharmacology. I know that he represented the school in martial arts competition, but I am not aware of any national championships won by Tei Fu Chen.

13. I am not aware of any custom in my native country of Taiwan to acknowledge an individual with the title of "Doctor" if that person has not obtained a doctorate degree from a medical school, a doctorate degree in another field of study, or as a licensed herbalist. Someone who had obtained knowledge about herbs through self-study would not be addressed as "doctor" as a sign of respect in Taiwan.

14. I am not aware of any time that my son was a research scientist.

15. I am not aware of any person addressing my son as "Doctor" while we lived in Taiwan.

16. I have never said to my Tei Fu Chen: "Our ancient ways are not enough. You must study modern science, chemistry,

and medicine. You must bring together modern and ancient ideas.
This will be your greatest service."

17. This affidavit is provided voluntarily and without duress.

DATED this 25 day of September, 1990.

Yung Yeuan Chen
YUNG YEUAN CHEN

SUBSCRIBED and SWORN to before me this 25th day of
September, 1990.

My Commission Expires:
5-3-92

Dawne M. Adamson
Notary Public
Residing at Salt Lake City, Utah

