

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA
HALL OF JUSTICE

COMPLAINT FOR ARREST WARRANT(S)

SONG LAN EFJ792
WANYU LI EFJ791
ZONGCHANG YU EFJ790

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

vs.

ZONGCHANG YU (10/10/1961),
3261 FALLS CREEK DR SAN JOSE CA 95135
WANYU LI (07/04/1965),
10367 GREENWOOD CT. APT 5 CUPERTINO CA
95014
SONG LAN (11/25/1973),
18660 BARNHART AVE CUPERTINO CA 95014

Defendant(s).

FELONY COMPLAINT

DA NO: 190411920

CEN

EFJ790 ZY WARR

EFJ791 WL WARR

EFJ792 SL WARR

The undersigned is informed and believes that:

COUNT 1

On or about May 30, 2015, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(3), a Felony, was committed by ZONGCHANG YU who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did having unlawfully obtained access to the article, without authority, make and caused to be made, a copy of an article representing a trade secret.

COUNT 2

On or about May 30, 2015, in the County of Santa Clara, State of California, the crime of GRAND THEFT OF PERSONAL PROPERTY OF A VALUE OVER NINE HUNDRED AND FIFTY DOLLARS, in violation of PENAL CODE SECTION 487(a), a Felony, was committed by ZONGCHANG YU who did unlawfully take personal property, trade secret, of a value exceeding nine hundred and fifty dollars (\$950.00), the property of ASML.

COUNT 3

On or about August 5, 2014, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(3), a Felony, was committed by ZONGCHANG YU who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did having unlawfully obtained access to the article, without authority, make and caused to be made, a copy of an article representing a trade secret.

COUNT 4

On or about and between May 1, 2013 and April 6, 2015, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(1), a Felony, was committed by ZONGCHANG YU who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did steal, take, carry away, and use without authorization, a trade secret.

COUNT 5

On or about and between January 9, 2015 and August 10, 2015, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(1), a Felony, was committed by ZONGCHANG YU who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did steal, take, carry away, and use without authorization, a trade secret.

COUNT 6

On or about September 24, 2014, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(1), a Felony, was committed by WANYU LI who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did steal, take, carry away, and use without authorization, a trade secret.

COUNT 7

On or about September 24, 2014, in the County of Santa Clara, State of California, the crime of TAKING, COPYING, AND USING COMPUTER DATA, in violation of PENAL CODE SECTION

502(c)(2), a Felony, was committed by WANYU LI who did knowingly access and without permission take, copy, and make use of data from a computer, computer system, and computer network, and take and copy supporting documentation which existed and resided internal and external to a computer, computer system, and computer network.

COUNT 8

On or about and between January 10, 2015 and August 7, 2015, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(1), a Felony, was committed by SONG LAN who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did steal, take, carry away, and use without authorization, a trade secret.

COUNT 9

On or about and between January 10, 2015 and January 12, 2016, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(1), a Felony, was committed by SONG LAN who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did steal, take, carry away, and use without authorization, a trade secret.

COUNT 10

On or about March 12, 2016, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(1), a Felony, was committed by SONG LAN who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did steal, take, carry away, and use without authorization, a trade secret.

COUNT 11

On or about March 12, 2016, in the County of Santa Clara, State of California, the crime of THEFT OR UNAUTHORIZED COPYING OF TRADE SECRETS, in violation of PENAL CODE SECTION 499c(b)(1), a Felony, was committed by SONG LAN who, with the intent to deprive and withhold the control of a trade secret from its owner, namely, ASML, and with the intent to appropriate the trade secret to his or her own use and to the use of another, did steal, take, carry away, and use without authorization, a trade secret.

Further, attached and incorporated by reference are official reports and documents of a law enforcement agency which the complainant believes establish probable cause for the arrest of defendant SONG LAN, for the above-listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

Complainant therefore requests that the defendant(s) be dealt with according to law.

I certify under penalty of perjury that the above is true and correct.

Executed on April 30, 2019, in SANTA CLARA County, California.

Nicholas Olson 4K121
(Nicholas Olson 4K121)
DABOI BI181025368
WEST/ D411/ FELONY/ MS

Cash or Bond \$ _____

Date: _____

JUDGE OF THE SUPERIOR COURT

Warrant Received for Service by:

_____ on _____