

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

HO WAN KWOK,
a/k/a “Miles Guo,”
a/k/a “Miles Kwok,”
a/k/a “Guo Wengui,”
a/k/a “Brother Seven,”
a/k/a “The Principal,”
KIN MING JE,
a/k/a “William Je,” and
YANPING WANG,
a/k/a “Yvette,”
Defendants.,

Case No. **23 Cr. 118 (AT)**

MOTION FOR RETURN OF PROPERTY

Undersigned counsel represents 3,345 customers of the Himalaya Exchange (“the Exchange”), who hold Himalaya Dollar (HDO) and Himalaya Coin (HCN) cryptocurrency (“petitioners”). Pursuant to Federal Rule of Criminal Procedure 41(g), petitioners move for return of their property seized by the United States in *United States v. Kwok et al*, 23 CR 118 (SDNY). The petitioners have a distinct, identifiable third-party interest in the forfeited property. Petitioners file the attached Memorandum in Support of this Motion.

Dated: December 6, 2023

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CERTIFICATION OF CONFERENCE AND NOTICE

I, Bradford Geyer, certify that counsel I have conferred with counsel for the Government in an effort in good faith to resolve by agreement the issues raised by the motion without the intervention of the Court, and have been unable to reach agreement. I also hereby certify that on December 6, 2023, a true and accurate copy of the forgoing was electronically filed and served through the ECF system of the U.S. District Court for the Southern District of New York.

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