

EXHIBIT B



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VIA EMAIL

August 21, 2015

Lakshmi Srinivasan Herman
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Assistant United States Attorneys
United States Attorney's Office
970 Broad Street, Seventh Floor
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RE: Wealthy Max (Case 2:15-cv-02036)

Dear Lakshmi and Shana:

I write on behalf of my client, Wealthy Max, in connection with the ongoing civil forfeiture matter. As you know from our meetings, during which we provided information about the automotive recycling business in China and our client's coin redemption business, both of which I observed in operation first-hand while in China in May, I remain convinced that Matthew Wong and Dickie Chan did not endeavor to perpetrate any type of fraud in the course of their dealings with the U.S. Mint's coin redemption program. Repeatedly, I have relayed to you – and our clients have confirmed to you directly – that they have never sought to redeem any coins that are not genuine. In fact, you heard from both Mr. Wong and Mr. Chan that they always assumed Mint performed an analysis on the coins received in order to ensure their authenticity over the course of years during which Wealthy Max (and their related company, Glory Smart) have been submitting coins for redemption. Until recently, the Mint had never expressed any concern about the genuineness of the coins tendered.

In any event, we are disappointed you have seen fit to proceed with the forfeiture proceeding rather than agreeing to dismiss the action against Wealthy Max.

Based on the amended verified complaint recently filed, you indicate that the U.S. Customs and Border Protection laboratory analyzed certain samples from the forfeited shipment and determined that a certain unstated portion were deemed to be counterfeit. I now request that your Office immediately provide me with any and all documentation reflecting testing performed on each shipment of coins tendered to the Mint by Wealthy Max, by Glory Smart, or by an agent for either of these companies, including:

- (a) a description of the sampling method(s) used,
- (b) a description of each test performed,
- (c) the name, address, business or government affiliation and credentials of the person(s) who selected the samples,
- (d) the name, address, business or government affiliation and credentials of the person(s) who performed the tests,
- (e) the location of the equipment used in the performance of the tests (name of institution, street address and room number),
- (f) copies of all test results, including all null or negative results obtained, and
- (g) a statement as to whether any coins selected as samples were set aside and not tested so as to preserve an untested sample of the sample mix. I ask for this in the interest of justice and the expeditious and efficient resolution of the civil forfeiture matter.

As you know, my clients made enormous efforts and spent considerable resources to open up their operations to Government investigation and scrutiny. My co-counsel, David Cohen, and I traveled to China and Hong Kong to witness my client's operations first hand. Additionally, Matthew Wong and Dickie Chan flew from Hong Kong on very short notice to meet with you and respond to your questions. They also invited you and your team to visit their facilities in China to witness their operations and processes first hand.

As we have previously stated, when you are processing literally millions of coins the likelihood that 100% of the coins will be genuine is remote. Surely, in most coin-operated equipment, non-genuine coins will be passed off as genuine. Regardless, to the extent the CBP labs have identified non-genuine coins, Wealthy Max has no desire to have those coins redeemed and understands fully that it is not entitled to payment for any coins that are not genuine U.S. Mint coins.

I look forward to your prompt reply to our requests.

Sincerely Yours,

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