## IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY NEWARK DIVISION

UNITED STATES OF AMERICA,	§ 8	
Plaintiff,	§ §	
V.		
v.	§ §	
ONE 2014 BLACK PORSCHE CAYMAN	§ §	Civil Action No. 2:15-cy-2036
COUPE BEARING VEHICLE		CIVII ACTIOII NO. 2.13-CV-2030
	§	
IDENTIFICATION NUMBER (VIN)	§	
WP0AB2A85EK191487;	§	
THE DEAL DRODERTY IZMOVANIA 010010	§	
THE REAL PROPERTY KNOWN AS 10212	§ §	
DENTON DRIVE, DALLAS, TEXAS;		
AND A MODAL OF ADDROVE (AMERICA)	§	
AND A TOTAL OF APPROXIMATELY	§	
\$5,453,011.81 COMPRISED OF:	§	
\$2,845,428.41 PREVIOUSLY DUE AND	§	
PAYABLE BY THE UNITED STATES MINT	§	
TO AMERICA NAHA, INC.;	§	
	§	
\$2,388,091.18 PREVIOUSLY DUE AND	§	
PAYABLE BY THE UNITED STATES MINT	§	
TO WEALTHY MAX LIMITED; AND	§	
	§	
\$219,492.22 PREVIOUSLY DUE AND	§	
PAYABLE BY THE UNITED STATES MINT	§	
TO XRACER SPORTS CO. LTD.,	§	
	§	

Defendants in Rem.

**CLAIMANT WEALTHY MAX'S MOTION** TO DISMISS THE AMENDED COMPLAINT

For the reasons outlined in the Memorandum in Support of this Motion to Dismiss,

Claimant, Wealthy Max, respectfully requests that the Court dismiss the Amended Complaint in

this matter with prejudice, and order the Government to deliver to Wealthy Max the proceeds

from the redemption of the shipment of mutilated coins accepted by the Mint on or about June

26, 2014, and acknowledged by the Mint to be "due and owing" to Wealthy Max. Claimant

asserts that the Government's actions have violated Civil Asset Forfeiture Reform Act of 2000

("CAFRA"), Pub.L. No. 106-185, 114 Stat. 202. Further, the Amended Complaint should be

dismissed with prejudice because venue in this district is improper pursuant to Federal Rule of

Civil Procedure 12(b)(3) and the allegations do not state a claim upon which relief can be

granted under Federal Rule of Civil Procedure 12(b)(6). The Government has completely failed

to state sufficiently detailed facts to support a reasonable belief it will be able to meet its burden

of proof at trial.

Should the Court allow this action to proceed, in the interest of justice, claimant Wealthy

Max asks that the Court sever the Government's claims against Claimant's Property from those

that involve other individuals and entities inasmuch as no connection among them has been

shown to exist.

Dated: October 20, 2015

Respectfully submitted,

/s/Bradford Geyer

By: /s Bradford Geyer GeyerGorey, LLP

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