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9 JAE YONG CHUN, SANG AH PARK,  
10 YANG JA YOON, and PORT  
11 MANLEIGH TRUST

12 **UNITED STATES DISTRICT COURT**  
13 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
14 **WESTERN DIVISION – LOS ANGELES**

15 UNITED STATES OF AMERICA

16 Plaintiff,

17 v.

18 \$726,951.45 IN UNITI BANK FUNDS,

19 Defendant.  
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21  
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24  
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26  
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28

Civil Case No.: 2:14-cv-03140-RGK (SSx)

**ANSWER OF CLAIMANTS JAE  
YONG CHUN, SANG AH PARK,  
YANG JA YOON, AND PORT  
MANLEIGH TRUST TO VERIFIED  
COMPLAINT FOR FORFEITURE IN  
REM**

**DEMAND FOR JURY TRIAL**

1 Claimants Jae Yong Chun, Sang Ah Park, Yang Ja Yoon, and the Port  
2 Manleigh Trust, through their undersigned attorneys, hereby Answer the Verified  
3 Complaint for Forfeiture in rem filed by the United States (the "Complaint") as follows:

4 1. Claimants admit that the United States purports to bring this action  
5 under the referenced statutory provisions. To the extent a further response is required,  
6 Claimants deny the allegations in Paragraph 1.

7 2. Paragraph 2 states a legal conclusion to which no response is required.  
8 To the extent a further response is required, Claimants deny the allegations in Paragraph  
9 2.

10 3. Paragraph 3 states a legal conclusion to which no response is required.  
11 To the extent a further response is required, Claimants deny the allegations in Paragraph  
12 3.

13 4. Admitted.

14 5. Claimants admit that the United States has wrongfully seized  
15 \$726,951.45 of Claimants' money, and that the United States purports to bring this action  
16 against Claimants' money. Claimants also admit that the wrongfully seized funds  
17 represent proceeds on the sale of 1825 Port Manleigh Place in Newport Beach,  
18 California. Claimants lack knowledge or information sufficient to form a belief about the  
19 truth of the remaining allegations in Paragraph 5, and therefore those allegations are  
20 denied.

21 6. Claimants admit that their interests are adversely affected by these  
22 proceedings, because their property has wrongfully been seized by the United States.  
23 Claimants deny the remaining allegations in Paragraph 6.

24 7. Claimants lack knowledge or information sufficient to form a belief  
25 regarding the truth of the allegations in Paragraph 7, and therefore those allegations are  
26 denied.

27 8. Denied.  
28

1           9. Claimants lack knowledge or information sufficient to form a belief  
2 regarding the truth of the allegations contained in Paragraph 9, and therefore those  
3 allegations are denied. As a further response, Claimants state that the allegations in  
4 Paragraph 9 regarding events that occurred approximately 35 years ago are irrelevant to  
5 the claims asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent  
6 with the requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain  
7 “a short and plain statement of the claim showing that the pleader is entitled to relief.”

8           10. Claimants lack knowledge or information sufficient to form a belief  
9 regarding the truth of the allegations contained in Paragraph 10, and therefore those  
10 allegations are denied. As a further response, Claimants state that the allegations in  
11 Paragraph 10 regarding events that occurred many years ago are irrelevant to the claims  
12 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
13 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
14 and plain statement of the claim showing that the pleader is entitled to relief.”

15           11. Claimants admit that Jae Yong Chun received bearer bonds from his  
16 grandfather Lee Kyu Dong, and further state that there was nothing illegal or illegitimate  
17 about this transfer from grandfather to grandson or the source of the bearer bonds.  
18 Claimants also admit that Jae Yong Chun and his wife Sang Ah Park subsequently  
19 acquired a house in Alpharetta, Georgia, using funds earned and acquired through legal  
20 and legitimate means. Lastly, Claimants admit that, following the sale of their home in  
21 Alpharetta, Georgia, Mr. Chun and Ms. Park invested the proceeds of the sale in the  
22 purchase of a home in Newport Beach, California, which home was subsequently sold in  
23 2014. Claimants deny the remaining allegations in Paragraph 11.

24           12. Claimants lack knowledge or information sufficient to form a belief  
25 regarding the truth of the allegations contained in Paragraph 12, and therefore those  
26 allegations are denied. As a further response, Claimants state that the allegations in  
27 Paragraph 12 regarding events that occurred approximately 35 years ago are irrelevant to  
28 the claims asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent

1 with the requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain  
2 “a short and plain statement of the claim showing that the pleader is entitled to relief.”

3 13. Claimants lack knowledge or information sufficient to form a belief  
4 regarding the truth of the allegations contained in Paragraph 13, and therefore those  
5 allegations are denied. As a further response, Claimants state that the allegations in  
6 Paragraph 13 regarding events that occurred approximately 35 years ago are irrelevant to  
7 the claims asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent  
8 with the requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain  
9 “a short and plain statement of the claim showing that the pleader is entitled to relief.”

10 14. Claimants lack knowledge or information sufficient to form a belief  
11 regarding the truth of the allegations contained in Paragraph 14, and therefore those  
12 allegations are denied. As a further response, Claimants state that the allegations in  
13 Paragraph 14 regarding events that occurred many years ago are irrelevant to the claims  
14 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
15 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
16 and plain statement of the claim showing that the pleader is entitled to relief.”

17 15. Denied.

18 16. Claimants admit that President Chun faced criminal charges in Korea  
19 regarding alleged conduct that occurred while he was in office and that he was convicted  
20 of certain offenses in the 1990s. Claimants otherwise lack knowledge or information  
21 sufficient to form a belief regarding the truth of the allegations contained in Paragraph  
22 16, and therefore those allegations are denied.

23 17. Claimants admit that President Chun faced criminal charges in Korea  
24 regarding alleged conduct that occurred while he was in office and that he was convicted  
25 of certain offenses in the 1990s. Claimants otherwise lack knowledge or information  
26 regarding the truth of the allegations contained in Paragraph 17, and therefore those  
27 allegations are denied. As a further response, Claimants state that the allegations in  
28 Paragraph 17 regarding events that occurred many years ago are irrelevant to the claims

1 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
2 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
3 and plain statement of the claim showing that the pleader is entitled to relief.”

4 18. Claimants admit that President Chun faced criminal charges in Korea  
5 regarding alleged conduct that occurred while he was in office; that he was convicted of  
6 certain offenses in the 1990s; and that he served time in prison before his sentence was  
7 commuted. Claimants otherwise lack knowledge or information sufficient to form a  
8 belief regarding the truth of the allegations contained in Paragraph 18, and therefore those  
9 allegations are denied. As a further response, Claimants state that the allegations in  
10 Paragraph 18 regarding events that occurred many years ago are irrelevant to the claims  
11 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
12 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
13 and plain statement of the claim showing that the pleader is entitled to relief.”

14 19. Claimants admit that President Chun has faced criminal charges in  
15 Korea regarding alleged conduct that occurred while he was in office; that he was  
16 convicted of certain offenses in the 1990s; and that he served time in prison before his  
17 sentence was commuted. Claimants otherwise lack knowledge or information sufficient  
18 to form a belief regarding the truth of the allegations contained in Paragraph 19, and  
19 therefore those allegations are denied. As a further response, Claimants state that the  
20 allegations in Paragraph 19 regarding events that occurred many years ago are irrelevant  
21 to the claims asserted in the Complaint, unfairly prejudicial to Claimants, and  
22 inconsistent with the requirement of Federal Rule of Civil Procedure 8(a)(2) that a  
23 complaint contain “a short and plain statement of the claim showing that the pleader is  
24 entitled to relief.”

25 20. Claimants lack knowledge or information sufficient to form a belief  
26 regarding the truth of the allegations contained in Paragraph 20, and therefore those  
27 allegations are denied. As a further response, Claimants state that the allegations in  
28 Paragraph 20 regarding events that occurred many years ago are irrelevant to the claims

1 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
2 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
3 and plain statement of the claim showing that the pleader is entitled to relief.”

4 21. Claimants lack knowledge or information sufficient to form a belief  
5 regarding the truth of the allegations contained in Paragraph 21, and therefore those  
6 allegations are denied. As a further response, Claimants state that the allegations in  
7 Paragraph 21 regarding events that occurred many years ago are irrelevant to the claims  
8 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
9 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
10 and plain statement of the claim showing that the pleader is entitled to relief.”

11 22. Claimants lack knowledge or information sufficient to form a belief  
12 regarding the truth of the allegations contained in Paragraph 22, and therefore those  
13 allegations are denied. As a further response, Claimants state that the allegations in  
14 Paragraph 22 regarding events that occurred many years ago are irrelevant to the claims  
15 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
16 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
17 and plain statement of the claim showing that the pleader is entitled to relief.”

18 23. Claimants lack knowledge or information sufficient to form a belief  
19 regarding the truth of the allegations contained in Paragraph 23, and therefore those  
20 allegations are denied. As a further response, Claimants state that the allegations in  
21 Paragraph 23 regarding events that occurred many years ago are irrelevant to the claims  
22 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
23 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
24 and plain statement of the claim showing that the pleader is entitled to relief.”

25 24. Claimants lack knowledge or information sufficient to form a belief  
26 regarding the truth of the allegations contained in Paragraph 24, and therefore those  
27 allegations are denied. As a further response, Claimants state that the allegations in  
28 Paragraph 24 regarding events that occurred many years ago are irrelevant to the claims

1 asserted in the Complaint, unfairly prejudicial to Claimants, and inconsistent with the  
2 requirement of Federal Rule of Civil Procedure 8(a)(2) that a complaint contain “a short  
3 and plain statement of the claim showing that the pleader is entitled to relief.”

4 25. Claimants admit that Jae Yong Chun received bearer bonds from his  
5 grandfather Lee Kyu Dong, and further state that there was nothing illegal or illegitimate  
6 about this transfer from grandfather to grandson or the source of the bearer bonds.  
7 Claimants otherwise deny the allegations in Paragraph 25.

8 26. Claimants admit the allegations in the first two sentences of Paragraph  
9 26. Claimants deny the allegations in the third sentence of Paragraph 26.

10 27. Claimants admit that Jae Yong Chun received bearer bonds from his  
11 grandfather Lee Kyu Dong, and further state that there was nothing illegal or illegitimate  
12 about this transfer from grandfather to grandson or the source of the bearer bonds.  
13 Claimants otherwise deny the allegations in Paragraph 27.

14 28. Claimants admit that Ryu Chang-hee was a former business associate  
15 of Jae Yong Chun and Ryu Chang-hee managed assets for Jae Yong Chun, including  
16 opening numerous accounts within which to hold the assets. Claimants lack knowledge  
17 or information sufficient to form a belief regarding the truth of the remaining allegations  
18 contained in Paragraph 28, and therefore those allegations are denied.

19 29. Claimants admit that Ryu Chang-hee was a former business associate  
20 of Jae Yong Chun and Ryu Chang-hee managed assets for Jae Yong Chun, including  
21 opening numerous accounts within which to hold the assets. Claimants also admit that, in  
22 2003, Jae Yong Chun and his wife Sang Ah Park acquired a house in Alpharetta,  
23 Georgia, using funds earned and acquired through legal and legitimate means. Claimants  
24 otherwise deny the allegations in Paragraph 29.

25 30. Claimants admit that Jae Yong Chun was questioned by the Korean  
26 prosecutors in 2013 about funds maintained in bank accounts. Claimants otherwise deny  
27 the allegations in Paragraph 30.



1           31. Claimants admit that Jae Yong Chun received bearer bonds from his  
2 grandfather Lee Kyu Dong, and further state that there was nothing illegal or illegitimate  
3 about this transfer from grandfather to grandson. Claimants lack knowledge or  
4 information or knowledge sufficient to form a belief regarding whether the third parties  
5 referenced in Paragraph 31 actually made the statements attributed to them or whether the  
6 context of any such statements is accurately depicted in Paragraph 31, and therefore  
7 Claimants deny the allegations in the second and third sentences of Paragraph 31.  
8 Claimants otherwise deny the allegations in Paragraph 31.

9           32. Claimants lack knowledge or information sufficient to form a belief  
10 regarding the truth of the allegations contained in Paragraph 32, which relate to particular  
11 financial transactions that allegedly occurred many years ago, and therefore those  
12 allegations are denied.

13           33. Claimants lack knowledge or information sufficient to form a belief  
14 regarding the truth of the allegations contained in Paragraph 33, which relate to particular  
15 financial transactions that allegedly occurred many years ago, and therefore those  
16 allegations are denied.

17           34. Claimants lack knowledge or information sufficient to form a belief  
18 regarding the truth of the allegations contained in Paragraph 34, which relate to particular  
19 financial transactions that allegedly occurred many years ago, and therefore those  
20 allegations are denied.

21           35. Claimants lack knowledge or information sufficient to form a belief  
22 regarding the truth of the allegations contained in Paragraph 35, which relate to particular  
23 financial transactions that allegedly occurred many years ago, and therefore those  
24 allegations are denied.

25           36. Claimants lack knowledge or information sufficient to form a belief  
26 regarding the truth of the allegations contained in Paragraph 36, which relate to particular  
27 financial transactions that allegedly occurred many years ago, and therefore those  
28 allegations are denied.



1           37. Claimants lack knowledge or information sufficient to form a belief  
2 regarding the truth of the allegations contained in Paragraph 37, which relate to particular  
3 financial transactions that allegedly occurred many years ago, and therefore those  
4 allegations are denied.

5           38. Claimants admit that Jae Yong Chun faced criminal tax-related  
6 charges in Korea arising from the transfer of bearer bonds from his grandfather Lee Kyu  
7 Dong, and that Jae Yong Chun was ultimately convicted on certain tax-related charges  
8 and acquitted on others. As a further response, Claimants state that the decisions of the  
9 Korean courts are reported in written decisions that are the best evidence of their contents  
10 and Claimants deny the allegations of Paragraph 38 to the extent they are inconsistent  
11 with the terms of such written decisions. Claimants otherwise deny the allegations of  
12 Paragraph 38.

13           39. Claimants deny the allegations in the first sentence of Paragraph 39.  
14 Claimants lack knowledge or information sufficient to form a belief regarding the truth of  
15 the remaining allegations contained in Paragraph 39, which relate to particular financial  
16 transactions that allegedly occurred many years ago, and therefore those allegations are  
17 denied.

18           40. Claimants deny the allegations in the first and second sentences of  
19 Paragraph 40. Claimants lack information or knowledge sufficient to form a belief  
20 regarding whether the third parties referenced in Paragraph 40 actually made the  
21 statements attributed to them or whether the context of any such statements is accurately  
22 depicted in Paragraph 40, and therefore Claimants deny the remaining allegations in the  
23 second and third sentences of Paragraph 40.

24           41. Claimants admit that, in 2003, Jae Yong Chun and his wife Sang Ah  
25 Park acquired a house in Alpharetta, Georgia, using funds earned and acquired through  
26 legal and legitimate means. Claimants also admit that, following the sale of their home in  
27 Alpharetta, Georgia, Claimants Chun and Park invested the proceeds of the sale in the  
28

1 purchase of a home in Newport Beach, California. Claimants deny the remaining  
2 allegations in Paragraph 41.

3 42. Claimants deny the allegations in first sentence of Paragraph 42.  
4 Claimants lack information or knowledge sufficient to form a belief regarding the truth of  
5 the remaining allegations in Paragraph 42, and therefore those allegations are denied.

6 43. Claimants admit that Jae Yong Chun was involved in the creation of  
7 the two companies referenced in Paragraph 43 and also admit that OR Solutions did not  
8 generate revenue or profit. Claimants deny the remaining allegations in Paragraph 43.

9 44. Claimants admit that Jae Yong Chun and his wife Sang Ah Park  
10 purchased the Georgia Property on or about May 15, 2003. Claimants also admit that Mr.  
11 Chun and Ms. Park purchased the Georgia Property with their own funds and without any  
12 financing from a third party. Claimants deny the remaining allegations in Paragraph 44.

13 45. Claimants admit that the home in Alpharetta, Georgia was at one time  
14 titled in the name of Sang Ah Park and further state Ms. Park was at that time and is  
15 today the wife of Jae Yong Chun. Claimants also admit that the Alpharetta, Georgia  
16 home was subsequently transferred to a trust, with Yang Ja Yoon as Trustee. Claimants  
17 deny the remaining allegations in Paragraph 45.

18 46. Claimants admit that Jae Yong Chun and his wife Sang Ah Park wired  
19 funds from Korea to the United States to purchase their home in Alpharetta, Georgia in  
20 2003, and further state that there is nothing illegal or improper about such international  
21 wires. Claimants lack knowledge or information sufficient to form a belief regarding the  
22 truth of the remaining allegations contained in Paragraph 46, relating to the precise dates,  
23 amounts, and accounts involved in particular financial transactions that allegedly  
24 occurred many years ago, and therefore those allegations are denied.

25 47. Claimants lack knowledge or information sufficient to form a belief  
26 regarding the truth of the allegations contained in Paragraph 47, which relate to the  
27 precise dates, amounts, and accounts involved in particular financial transactions that  
28 allegedly occurred many years ago, and therefore those allegations are denied.

1           48. Claimants admit that Jae Yong Chun and his wife Sang Ah Park  
2 moved from Korea to Alpharetta, Georgia in 2003 and they wired funds from Korea to  
3 the United States at or around the time of their move. Claimants deny the remaining  
4 allegations of Paragraph 48.

5           49. Claimants lack knowledge or information sufficient to form a belief  
6 regarding the truth of the allegations contained in Paragraph 49, which relate to the  
7 precise dates, amounts, and accounts involved in particular financial transactions that  
8 allegedly occurred many years ago, and therefore those allegations are denied.

9           50. Claimants lack knowledge or information sufficient to form a belief  
10 regarding the truth of the allegations contained in the first three sentences of Paragraph  
11 50, which relate primarily to a specific alleged financial transaction from 2003, and  
12 therefore those allegations are denied. Claimants deny the allegations in the fourth  
13 sentence of Paragraph 50.

14           51. Claimants admit that Jae Yong Chun was interviewed by Korean  
15 prosecutors in 2013. In the absence of a certified, accurate transcript or videotape of that  
16 interview, Claimants lack information sufficient to form a belief regarding the truth of the  
17 allegations in Paragraph 51 regarding specific questions posed and answers given during  
18 the referenced interview, and therefore those allegations are denied.

19           52. Claimants admit that Yang Ja Yoon was interviewed by Korean  
20 prosecutors. In the absence of a certified, accurate transcript or videotape of that  
21 interview, Claimants lack information sufficient to form a belief regarding the truth of the  
22 allegations in Paragraph 52 regarding specific questions posed and answers given during  
23 the referenced interview, and therefore those allegations are denied.

24           53. Claimants admit that Sang Ah Park was interviewed by Korean  
25 prosecutors. In the absence of a certified, accurate transcript or videotape of that  
26 interview, Claimants lack information sufficient to form a belief regarding the truth of the  
27 allegations in Paragraph 53 regarding specific questions posed and answers given during  
28 the referenced interview, and therefore those allegations are denied.

1           54. Claimants lack knowledge or information sufficient to form a belief  
2 regarding the truth of the allegations contained in the first two sentences of Paragraph 54,  
3 which relate primarily to a specific alleged financial transaction from 2003, and therefore  
4 those allegations are denied. Claimants deny the allegations in the third sentence of  
5 Paragraph 54.

6           55. Claimants admit that Jae Yong Chun was interviewed by Korean  
7 prosecutors in 2013. In the absence of a certified, accurate transcript or videotape of that  
8 interview, Claimants lack information sufficient to form a belief regarding the truth of the  
9 allegations in Paragraph 55 regarding specific statements allegedly made during the  
10 referenced interview, and therefore those allegations are denied.

11           56. Claimants lack knowledge or information sufficient to form a belief  
12 regarding the truth of the allegations contained in Paragraph 56, and therefore those  
13 allegations are denied.

14           57. Claimants lack knowledge or information sufficient to form a belief  
15 regarding the truth of the allegations contained in the first two sentences of Paragraph 57,  
16 which relate to specific alleged financial transactions from 2003, and therefore those  
17 allegations are denied. Claimants deny the allegations in the fourth sentence of  
18 Paragraph 57.

19           58. Claimants lack knowledge or information sufficient to form a belief  
20 regarding the truth of the allegations contained in Paragraph 58, which relate to the  
21 precise dates, amounts, and accounts involved in particular financial transactions that  
22 allegedly occurred in 2003, and therefore those allegations are denied.

23           59. Denied.

24           60. Claimants lack knowledge or information sufficient to form a belief  
25 regarding the truth of the allegations contained in the first three sentences of Paragraph  
26 60, which relate to the details involved in particular financial transactions that allegedly  
27 occurred in 2003, and therefore those allegations are denied. Claimants lack knowledge  
28 or information sufficient to form a belief regarding whether the third parties referenced in

1 Paragraph 60 actually made the statements attributed to them or whether the context of  
2 any such statements is accurately depicted in Paragraph 60, and therefore Claimants deny  
3 the remaining allegations in the second and third sentences of Paragraph 60.

4 61. Claimants admit that Jae Yong Chun purchased and later sold a  
5 membership in the Hwasan Club for approximately the amounts of money alleged in  
6 Paragraph 61, and further state that this membership was purchased with funds acquired  
7 through legitimate and legal means. Claimants deny the remaining allegations of  
8 Paragraph 61.

9 62. Claimants admit that Jae Yong Chun and his wife Sang Ah Park  
10 purchased the Georgia Property in 2003 and subsequently sold the property in 2004.  
11 Claimants lack knowledge or information sufficient to form a belief regarding the truth of  
12 the remaining allegations contained in Paragraph 62, and therefore those allegations are  
13 denied.

14 63. Claimants lack knowledge or information sufficient to form a belief  
15 regarding the truth of the allegations contained in Paragraph 63, and therefore those  
16 allegations are denied.

17 64. Claimants admit the allegations in the first sentence of Paragraph 64.  
18 Claimants lack knowledge or information sufficient to form a belief regarding the truth of  
19 the allegations contained in the second sentence of Paragraph 64, and therefore those  
20 allegations are denied. Claimants deny the allegations contained in the third sentence of  
21 Paragraph 64.

22 65. Claimants admit that they purchased the Newport Beach Property, and  
23 further state they did so with funds acquired through legitimate and legal means.  
24 Claimants lack knowledge or information sufficient to form a belief regarding the truth of  
25 the remaining allegations contained in Paragraph 65, and therefore those allegations are  
26 denied.

27 66. Claimants admit that they purchased the Newport Beach Property, and  
28 further state they did so with funds acquired through legitimate and legal means.

1 Claimants lack knowledge or information sufficient to form a belief regarding the truth of  
2 the remaining allegations contained in Paragraph 66, and therefore those allegations are  
3 denied.

4 67. Claimants admit that they purchased the Newport Beach Property, and  
5 further state they did so with funds acquired through legitimate and legal means. In the  
6 absence of a certified, accurate transcript or videotape of the interview between the  
7 Korean Prosecutor and Yang Ja Yoon, Claimants lack knowledge or information  
8 sufficient to form a belief regarding the truth of the allegations in Paragraph 67 regarding  
9 specific questions posed by and answers given to the Korean Prosecutor, and therefore  
10 those allegations are denied.

11 68. Claimants lack knowledge or information sufficient to form a belief  
12 regarding the truth of the allegations contained in Paragraph 68, which relate to the  
13 precise dates, amounts, and accounts involved in particular financial transactions that  
14 allegedly occurred in 2005, and therefore those allegations are denied.

15 69. Claimants admit that they purchased the Newport Beach Property, and  
16 further state they did so with funds acquired through legitimate and legal means.  
17 Claimants specifically deny the allegations in the last sentence of Paragraph 69 and state  
18 that they lack knowledge or information sufficient to form a belief regarding the truth of  
19 the remaining allegations contained in Paragraph 69, and therefore those allegations are  
20 denied.

21 70. Claimants lack knowledge or information sufficient to form a belief  
22 regarding the truth of the allegations contained in the first sentence of Paragraph 70, and  
23 therefore those allegations are denied. Claimants deny the allegations contained in the  
24 second sentence of Paragraph 70.

25 71. Claimants lack knowledge or information sufficient to form a belief  
26 regarding the truth of the allegations contained in Paragraph 71, which relate to the  
27 precise dates, amounts, and accounts involved in particular financial transactions that  
28 allegedly occurred in 2003, and therefore those allegations are denied.



1           72. Claimants lack knowledge or information sufficient to form a belief  
2 regarding the truth of the allegations contained in Paragraph 72, which relate to the  
3 precise dates, amounts, and accounts involved in particular financial transactions that  
4 allegedly occurred in 2003, and therefore those allegations are denied.

5           73. Claimants specifically deny the allegations contained in the second  
6 and third sentences of Paragraph 73. In the absence of a certified, accurate transcript or  
7 videotape of the interview between the Korean Prosecutor and Jae Yong Chun and Sang  
8 Ah Park, Claimants lack knowledge or information sufficient to form a belief regarding  
9 the truth of the allegations in Paragraph 73 regarding specific questions posed by and  
10 answers given to the Korean Prosecutor, and therefore those allegations are denied.

11           74. Denied.

12           75. Claimants lack knowledge or information sufficient to form a belief  
13 regarding the truth of the allegations contained in Paragraph 75, which relate to alleged  
14 statements made by a third party to unspecified "Korean prosecutors," and therefore  
15 those allegations are denied.

16           76. Claimants lack knowledge or information sufficient to form a belief  
17 regarding the truth of the allegations contained in Paragraph 76, which relate to details  
18 about tax returns filed 12, 13, and 14 years ago, and therefore those allegations are  
19 denied.

20           77. Claimants lack knowledge or information sufficient to form a belief  
21 regarding the truth of the allegations contained in Paragraph 77, and therefore those  
22 allegations are denied.

23           78. Paragraph 78 states legal conclusions to which no response is  
24 required. In the absence of a certified, accurate transcript or videotape of the interview  
25 between the Korean Prosecutor and Jae Yong Chun and Sang Ah Park, Claimants lack  
26 knowledge or information sufficient to form a belief regarding the truth of the allegations  
27 in Paragraph 78 regarding specific questions posed by and answers given to the Korean  
28 Prosecutor, and therefore those allegations are denied.



1           79. In the absence of a certified, accurate transcript or videotape of the  
2 interviews between “Korean investigators” and Jae Yong Chun and Yang Ja Joon,  
3 Claimants lack knowledge or information sufficient to form a belief regarding the truth of  
4 the allegations in Paragraph 79 regarding specific questions posed and answers given in  
5 these interviews, and therefore those allegations are denied.

6           80. Denied.

7           81. Claimants admit that they purchased the Newport Beach Property, and  
8 applied to receive a mortgage from Washington Mutual Bank. Claimants lack knowledge  
9 or information sufficient to form a belief regarding the truth of the allegations contained  
10 in Paragraph 81 relating to the representations made in the referenced Loan Application,  
11 and therefore those allegations are denied.

12           82. Claimants admit that they purchased the Newport Beach Property, and  
13 applied to receive a mortgage from Washington Mutual Bank. Claimants lack knowledge  
14 or information sufficient to form a belief regarding the truth of the remaining allegations  
15 contained in Paragraph 82, and therefore those allegations are denied.

16           83. Claimants lack knowledge or information sufficient to form a belief  
17 regarding the truth of the allegations contained in Paragraph 83, and therefore those  
18 allegations are denied.

19           84. Claimants lack knowledge or information sufficient to form a belief  
20 regarding the truth of the allegations contained in Paragraph 84, and therefore those  
21 allegations are denied.

22           85. Claimants admit that they purchased the Newport Beach Property  
23 with funds obtained, in part, from a mortgage from Washington Mutual Bank. Claimants  
24 deny the remaining allegations in Paragraph 85.

25           86. Claimants admit the allegations in the first two sentences of Paragraph  
26 86. Claimants lack knowledge or information sufficient to form a belief regarding the  
27 truth of the remaining allegations contained in Paragraph 86, and therefore those  
28 allegations are denied.

1           87. Paragraph 87 sets forth conclusions of law to which no response is  
2 required. To the extent a response is required, Claimants state that Paragraph 87 purports  
3 to paraphrase various Korean laws and statutes, which are the best evidence of their  
4 contents, and Claimants deny the allegations of Paragraph 87 to the extent they are  
5 inconsistent with the referenced Korean laws and statutes.

6           88. Paragraphs 1 through 87 above are incorporated by reference as if  
7 fully set forth herein.

8           89. Denied.

9           90. Denied.

10          91. Paragraphs 1 through 90 above are incorporated by reference as if  
11 fully set forth herein.

12          92. Denied.

13          93. Denied.

14          94. Paragraphs 1 through 93 above are incorporated by reference as if  
15 fully set forth herein.

16          95. Denied.

17          96. Denied.

18          97. Paragraphs 1 through 96 above are incorporated by reference as if  
19 fully set forth herein.

20          98. Denied.

21          99. Denied.

22          100. Paragraphs 1 through 99 above are incorporated by reference as if  
23 fully set forth herein.

24          101. Denied.

25          102. Denied.

**AFFIRMATIVE DEFENSES**

In further response to the Complaint, Claimants allege the following separate and distinct affirmative defenses, without conceding that they bear the burden of proof or persuasion as to any of them:

**First Affirmative Defense**

(Failure to State a Claim for Relief)

The Complaint, including each purported claim for relief set forth therein, fails to allege facts sufficient to constitute a claim for relief.

**Second Affirmative Defense**

(Innocent Owner)

The Complaint, including each purported claim for relief set forth therein, fails because Claimants are the innocent owners of the Defendant Funds under 18 U.S.C. § 983(d) and under all other applicable statutes and doctrines.

**Third Affirmative Defense**

(Statute of Limitations)

The Complaint, including each purported claim for relief set forth therein, is barred under the applicable statute of limitations, including but not limited to the limitation period contained in 19 U.S.C. § 1621.

**Fourth Affirmative Defense**

(Laches)

The Complaint, including each purported claim for relief set forth therein, is barred by the doctrine of laches.

**Fifth Affirmative Defense**

(Waiver)

The Complaint, including each purported claim for relief set forth therein, is barred by the doctrine of waiver.

Sixth Affirmative Defense

(Estoppel)

The Complaint, including each purported claim for relief set forth therein, is barred by the doctrine of estoppel.

Seventh Affirmative Defense

(Unclean Hands)

The Complaint, including each purported claim for relief set forth therein, is barred by the doctrine of unclean hands.

**PRAYER**

WHEREFORE, Claimants pray that:

- a) Plaintiff take nothing and Judgment be entered in favor of Claimants;
- b) The Defendant Funds be released to Claimants;
- c) Claimants be awarded their costs of suit;
- d) Claimants be awarded their attorneys' fees incurred in this action; and
- e) The Court grant Claimants such other relief as it deems just and proper.

Dated: July 14, 2014

Respectfully submitted,

COVINGTON & BURLING LLP

By: s/ Simon J. Frankel

Simon J. Frankel

Benjamin J. Razi

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Sang Ah Park, Ja Yoon, and the Port  
Manleigh Trust*

**CERTIFICATE OF SERVICE**

I certify that on July 14, 2014, I caused a copy of the foregoing Answer to be filed on the Court's CM/ECF filing system, which will cause a copy of this document to be served on counsel for all parties that have entered an appearance in this action.

s/ Simon J. Frankel  
Simon J. Frankel