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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
Jan 24, 2023 at 3:52 p.m.
John A. Mannle, Clerk of Court

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, Plaintiff, vs. MARTIN KAO, Defendant.	CR. NO. 21-00061 LEK MOTION FOR RETURN OF PROPERTY PURSUANT TO RULE 41(g) OF THE FEDERAL RULES OF CRIMINAL PROCEDURE; MEMORANDUM IN SUPPORT OF MOTION; DECLARATION OF JAMES TOSHIZO OTA; DECLARATION OF JESSE W. SCHIEL; EXHIBITS 1 – 9; CERTIFICATE OF SERVICE

MOTION FOR RETURN OF PROPERTY PURSUANT TO RULE 41(G) OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

PACMAR TECHNOLOGIES LLC f/k/a MARTIN DEFENSE GROUP, LLC f/k/a NAVATEK LLC ("**PacMar**") files this motion pursuant to Rule 41(g) of the Federal Rules of Criminal Procedure seeking the return of an Apple iPhone 11 Pro (IMEI 353247100759018, associated with the phone number ending in 0371), seized by the Department of Justice in 2020 at the time of Defendant MARTIN KAO'S arrest.

DATED: Honolulu, Hawaii, January 24, 2023.

/s/ Jesse W. Schiel
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JESSE W. SCHIEL

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