



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LDM:KKO  
F. #2015V00964

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 17, 2018

By Hand and ECF

Honorable LaShann DeArcy Hall  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11202

Re: *United States v. Approximately Four Hundred Fifty (450)  
Ancient Cuneiform Tablets, et al.*  
Civil Action No. 17-3980

Dear Judge DeArcy Hall:

Enclosed please find a stipulation executed by the United States and Hobby Lobby Stores, Inc. ("Hobby Lobby") in the above-referenced civil forfeiture action (the "Stipulation"). As set forth in the Stipulation of Settlement so-ordered by the Court on July 20, 2017 (the "July 20, 2017 Stipulation of Settlement"), Hobby Lobby consented to the forfeiture of certain artifacts which comprised part of a December 2010 purchase by Hobby Lobby. (Docket Entry no. 7). As set forth in the July 20, 2017 Stipulation of Settlement, Hobby Lobby also agreed to deliver to the United States any additional artifacts which comprised part of the same December 2010 purchase but were not previously turned over to the United States and consented to the forfeiture of such artifacts. (*Id.*). The July 20, 2017 Stipulation of Settlement further provided that the "Court shall retain jurisdiction to enforce this Stipulation." (*Id.*).

As stated in the enclosed Stipulation, and pursuant to the July 20, 2017 Stipulation of Settlement, Hobby Lobby has delivered to the United States an additional 245 cylinder seals which comprise part of the December 2010 order and consents to their forfeiture. Upon the Court so-ordering the Stipulation, the United States will commence publication of notice of forfeiture on the grounds that the 245 cylinder seals constitute merchandise that was introduced or attempted to be introduced into the United States contrary to law, and are therefore subject to seizure and forfeiture to the United States, in accordance with 19 U.S.C. § 1595a(c)(1)(A), as alleged in the Verified Complaint *in Rem*. Accordingly, the United States respectfully requests that the Court so-order the enclosed Stipulation.

Thank you for Your Honor's consideration of this submission

Respectfully submitted,

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United States Attorney

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Encl.

Cc: Michael McCullough, Esq. (by e-mail)