

1 Stephen J. Thomas (SBN 120751)
2 THOMAS BUSINESS LAW GROUP, P.C.
3 17870 Castleton Street, Suite 113
4 City of Industry, CA 91748
5 Tel: (626) 771-1005
6 Fax: (626) 628-1905
7 Email: slt@corporatefirm.com

8 Attorneys for Plaintiff,
9 ZHENG “JENNY” YANG

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12
13 ZHENG “JENNY” YANG, an individual;

14
15 Plaintiff

16 v.

17
18 UNITED STATES OF AMERICA (through
19 U.S. Customs and Border Protection;
20 OFFICER WOO; AIR CHINA LIMITED;
21 WORLDWIDE FLIGHT SERVICES, INC.;
22 and DOES 1 through 10, inclusive

Case No.:

COMPLAINT

DEMAND FOR JURY TRIAL

23 **INTRODUCTION**

24 1. Plaintiff Zheng Yang (“Plaintiff” or “Yang”) brings this action to
25 redress egregious violations of her constitutional and statutory rights arising from
26 the unlawful seizure of her personal property by U.S. Customs and Border
27 Protection (“CBP”), and the subsequent misconduct, negligence, and conspiracy
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1 between Air China Limited (“Air China”) and Worldwide Flight Services, Inc.
2 (“WFS”), which have together deprived her of her property, caused her severe
3 emotional distress, and inflicted economic harm.

4 **JURISDICTION AND VENUE**

5 2. This Court has jurisdiction under 28 U.S.C. §§ 1331, 1346(b), 1361,
6 and 2201, as this action arises under the Constitution, laws, and treaties of the
7 United States, including the Fourth and Fifth Amendments. and the Federal Tort
8 Claims Act (28 U.S.C.

9
10 3. Venue is proper in the Central District of California under 28 U.S.C.
11 §1391(b) because the acts and omissions complained of occurred at Los Angeles
12 International Airport (LAX).

13 **PARTIES**

14 4. Plaintiff Yang is a United States citizen residing in China.

15 5. Defendant United States of America is sued under the Federal Tort
16 Claims Act.

17 6. Defendant Officer Woo is a CBP officer, sued in both his individual
18 and official capacities.

19 7. Defendant Air China Limited is a foreign corporation operating flights
20 to and from LAX.

21 8. Defendant Worldwide Flight Services, Inc. (“WFS”) is a corporation
22 providing cargo operations at LAX.

23 9. DOES 1–10 are unknown agents or employees of the Defendants who
24 participated in the wrongful conduct.

FACTUAL BACKGROUND

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2 10. On or around February 14, 2025, Yang arrived to Los Angeles
3 International Airport (“LAX”) from Beijing, China on Air China Flight 983. At the
4 time, Yang brought eight (8) pieces of luggage, paying for the additional luggage.

5 11. Upon arrival, all eight pieces (8) of Yang’s luggage were seized and
6 confiscated by CBP, specifically by Officer Woo, claiming she had counterfeit
7 items in her luggage. She did not.

8 12. CBP confiscated her California Driver’s License and United States
9 Passport. A total of four (4) CBP officers searched her luggage for about two (2)
10 hours.

11 13. During the seizure and search of her luggage, an Air China
12 representative at LAX was summoned, but did not interact with Yang.

13 14. After the two hours search of her luggage, the CBP officer presented a
14 Post-Entry form to Yang, but held on to her luggage, claiming if she signed the
15 Post-Entry form she could retrieve the luggage the next day. Already exhausted
16 and stressed, Yang signed the form without further protest.

17 15. The Air China representative that was summoned by CBP wrote down
18 a contact number, instructing Yang to call the next day for instructions how to
19 retrieve her luggage.

20 16. Starting from February 15, 2025 through February 17, 2025, Yang
21 attempted to contact Air China for instructions how to retrieve her luggage. Each
22 time, she was met with a voice mailbox to leave a message.

23 17. Finally on or around February 17, 2025, Yang discovered two
24 voicemail messages from someone identifying himself as “Ming”, an employee of
25 WFS (Worldwide Flight Services) Air China Operations. He left a contact number
26 (310-422-1903) and stated that her luggage was at their warehouse, had been
27 declared to customs, and she needed to hire a broker to submit clearance
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1 documents. Yang had never authorized this company to handle customs clearance,
2 nor was she informed of an Air Waybill associated with her luggage.

3 18. Later, Ming admitted that WFS had submitted the Air Waybill.

4 19. On or around February 20, Yang visited the WFS warehouse in an
5 attempt to retrieve her luggage. She was only allowed to visually inspect the
6 luggage from the outside—no touching, no opening. She was told she had to pay
7 the following:

8 - Inbound cost: \$315

9 - Storage fee: \$225 per day

10 20. Plaintiff Yang was then informed that luggage could only be stored
11 there for 15 days. After that, it would be moved to another warehouse, but they
12 refused to disclose its location. They made it clear that the new warehouse's
13 address would only be provided after ALL storage fees were paid, effectively
14 ransoming her personal property.

15 21. To date, Yang has not been able to retrieve her luggage.

16 22. On or about April 25, 2025, Yang sent her demand letter to CBP for
17 damages and return of luggage.

18 23. On or around November 21, 2025, CBP denied her claim.

19 **FIRST CAUSE OF ACTION**

20 Violation of Fourth Amendment (Unlawful Seizure)

21 (Against United States, Officer Woo, and Does 1–5)

22 24. Plaintiff incorporates by reference the allegations of paragraphs 1-21
23 as though fully set forth herein.

24 25. On or around February 14, 2025, Yang arrived at LAX from Beijing,
25 China on Air China Flight 983. At the time, Yang brought eight (8) pieces of
26 luggage, paying for the additional luggage.
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1 34. On or around February 14, 2025, Yang arrived to LAX from Beijing,
2 China on Air China Flight 983. At the time, Yang brought eight (8) pieces of
3 luggage, paying for the additional luggage.

4 35. Upon arrival, all eight (8) of Yang's luggage were seized and
5 confiscated by CBP, specifically by Officer Woo, claiming she had counterfeit
6 items in her luggage. She did not.

7 36. CBP confiscated her California Driver's License and United States
8 Passport. A total of four (4) CBP officers searched her luggage for about two (2)
9 hours.

10 37. CBP Officer Woo accused Plaintiff of carrying counterfeit items
11 without probable cause, despite her explanations why she had so much extra
12 luggage.

13 38. Officers confiscated her U.S. passport and California driver's license,
14 searched all her luggage for two hours, and denied her attorney access.

15 39. After coercion, and duress from being questioned by CBP officers for
16 more than two hours, she signed a Post Entry with no copy or seizure notice
17 provided to her. Plaintiff was also not allowed to leave with her luggage, instead
18 leaving without them and being told that she could recover them later.

19 40. CBP wrongfully detained the Plaintiff after disembarking from her
20 flight and was detained by CBP officers without her right of due process, causing
21 her emotional distress, and violated her constitutional and statutory rights.

22 **THIRD CAUSE OF ACTION**

23 Federal Tort Claims Act (FTCA)

24 (Against United States)

25 41. Plaintiff incorporates by reference the allegations of paragraphs 1-40
26 as though fully set forth herein.

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1 42. On or around February 14, 2025, Yang arrived to LAX from Beijing,
2 China on Air China Flight 983. At the time, Yang brought eight (8) pieces of
3 luggage, paying for the additional luggage.

4 43. Upon arrival, all eight (8) of Yang's luggage were seized and
5 confiscated by CBP, specifically by Officer Woo, claiming she had counterfeit
6 items in her luggage. She did not.

7 44. CBP confiscated her California Driver's License and United States
8 Passport. A total of four (4) CBP officers searched her luggage for about two (2)
9 hours.

10 45. CBP Officer Woo accused Plaintiff of carrying counterfeit items
11 without probable cause, despite her explanations why she had so much extra
12 luggage.

13 46. Officers confiscated her U.S. passport and California driver's license,
14 searched all her luggage for two hours, and denied her attorney access.

15 47. After coercion, and duress from being questioned by CBP officers for
16 more than two hours, she signed a Post Entry with no copy or seizure notice
17 provided to her. Plaintiff was also not allowed to leave with her luggage, instead
18 leaving without them and being told that she could recover them later.

19 48. To date, Yang has not been able to retrieve her luggage.

20 49. On or about April 25, 2025, Yang sent her demand letter to CBP for
21 damages and the return of luggage.

22 50. On or around November 21, 2025, CBP denied her claim.

23 51. At the time of the incident, Officer Woo was an employee of the
24 United States government, specifically with the Customs and Border Control.

25 52. At the time of the incident, Officer Woo was acting within the course
26 and scope of their office or employment.

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1 53. The United States, through its agents and employees, owed Plaintiff
2 Yang a duty of care to release Plaintiff Yang in a timely and orderly fashion after
3 questioning.

4 54. The United States breached that duty by detaining Plaintiff Yang for
5 more than two (2) hours to search through her luggage while denying her attorney
6 access. After the search, CBP coerced Yang to sign the Post Entry but was not
7 allowed to leave with her luggage.

8 55. As a direct and proximate result of the United States' actions, the
9 plaintiff has suffered severe emotional distress and fears flying back to the United
10 States, fearing that she would have another similar experience as February 14.

11 56. The defendant CBP was a major contributing factor in causing
12 plaintiff her emotional distress when they seized and questioned the contents of her
13 luggage for more than two hours.

14 **FOURTH CAUSE OF ACTION**

15 Conversion

16 (Defendants Against Air China and WFS)

17 57. Plaintiff incorporates by reference the allegations of paragraphs 1-38
18 as though fully set forth herein.

19 58. On or around February 14, 2025, Yang arrived at LAX from Beijing,
20 China on Air China Flight 983. At the time, Yang brought eight (8) pieces of
21 luggage, paying for the additional luggage.

22 59. Upon arrival, all eight (8) of Yang's luggage were seized and
23 confiscated by CBP, specifically by Officer Woo, claiming she had counterfeit
24 items in her luggage. She did not.

25 60. After coercion, and duress from being questioned by CBP officers for
26 more than two hours, she signed a Post Entry with no copy or seizure notice
27 provided to her. Plaintiff was also not allowed to leave with her luggage, instead
28 leaving without them and being told that she could recover them later.

1 61. Starting from February 15, 2025 through February 17, 2025, Yang
2 attempted to contact Air China for instructions how to retrieve her luggage. Each
3 time, she was met with a voice mailbox to leave a message.

4 62. Finally on or around February 17, 2025, Yang discovered two
5 voicemail messages from someone identifying himself as “Ming”, an employee of
6 WFS Air China Operations. He left a contact number (310-422-1903) and stated
7 that her luggage was at their warehouse, had been declared to customs, and she
8 needed to hire a broker to submit clearance documents. Yang had never authorized
9 this company to handle customs clearance, nor was she informed of an Air Waybill
10 associated with her luggage.

11 63. Later, Ming admitted that WFS had submitted the Air Waybill.

12 64. On or around February 20, Yang visited the WFS warehouse in an
13 attempt to retrieve her luggage. She was only allowed to visually inspect the
14 luggage from the outside—no touching, no opening. She was told she had to pay
15 the following:

16 - Inbound cost: \$315

17 - Storage fee: \$225 per day

18 65. Plaintiff Yang was then informed that luggage could only be stored
19 there for 15 days. After that, it would be moved to another warehouse, but they
20 refused to disclose its location. They made it clear that the new warehouse's
21 address would only be provided after ALL storage fees were paid, effectively
22 ransoming her personal property.

23 66. WFS intentionally exercised control over Plaintiff Yang’s luggage by
24 refusing to release Yang’s luggage.

25 67. To date, Plaintiff Yang still hasn’t been able to retrieve her luggage
26 from WFS and continues to be thwarted by WFS with “reasons” to why she cannot
27 retrieve her luggage.

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1 75. Later, Ming admitted that WFS had submitted the Air Waybill.

2 76. On or around February 20, Yang visited the WFS warehouse in an
3 attempt to retrieve her luggage. She was only allowed to visually inspect the
4 luggage from the outside—no touching, no opening. She was told she had to pay
5 the following:

- 6 - Inbound cost: \$315
- 7 - Storage fee: \$225 per day

8 77. Plaintiff Yang was then informed that luggage could only be stored
9 there for 15 days. After that, it would be moved to another warehouse, but they
10 refused to disclose its location. They made it clear that the new warehouse's
11 address would only be provided after ALL storage fees were paid, effectively
12 ransoming her personal property.

13 78. To date, plaintiff Yang has yet to retrieve her luggage.

14 79. The CBP's behavior towards plaintiff Yang after the confiscation of
15 her luggage was extreme and outrageous with the intent to distress Yang.

16 80. Over two hours later of being interrogated by CBP officers, Yang,
17 under the distress caused by being interrogated by CBP officers for more than two
18 hours, was coerced to sign the Post Entry form just so she can leave.

19 81. The defendant CBP was a major contributing factor in causing
20 plaintiff her emotional distress when they seized and questioned the contents of her
21 luggage for more than two hours.

22 82. As a proximate result, the plaintiff has suffered severe emotional
23 distress and fears flying back to the United States, fearing that she would have
24 another similar experience as February 14.

25 **PRAYER FOR RELIEF**

- 26 1. Compensatory damages exceeding \$250,000.00;
- 27 2. Punitive damages against individual and corporate defendants;

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- 1 3. Declaratory relief declaring the seizure unconstitutional;
- 2 4. Order compelling immediate return of property;
- 3 5. Attorneys' fees and costs under 42 U.S.C. §1988;
- 4 6. Any further relief deemed just and proper.

5 **DEMAND FOR JURY TRIAL**

6 Plaintiff demands trial by jury on all issues so triable.

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8 Respectfully submitted,

9 THOMAS BUSINESS LAW GROUP, P.C.

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Stephen J. Thomas, Attorneys for Plaintiff
ZHENG "JENNY" YANG

14 Dated: December 31, 2025

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