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U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

In re SANCTUARY BELIZE LITIGATION

CASE NO.: 18-cv-3309-PJM

**OBJECTION AND RESPONSE TO FTC'S MOTION IN SUPPORT OF THE
REDRESS PLAN AND EXECUTIVE SUMMARY THEREOF AND
ORDER ENTERING THE FTC'S SCHEDULE
FOR SUBMISSIONS CONCERNING THE PROPOSED REDRESS PLAN**

Greg H. Klebanoff and Thuy Ngan Klebanoff ("Klebanoff"), proceeding and appearing *pro se*, do hereby object and respond the FTC's Motion In Support of the Redress Plan and Executive Summary Thereof [Doc # 1117], and to the Order Entering The FTC's Schedule for Submissions Concerning the Proposed Redress Plan [Doc # 1123], and say:

1. Klebanoff objects to the Redress Plan [Doc # 1117] for the following reason. The Redress Plan provides that Klebanoff may purchase their lot(s) at a reduced price with a ten-year interest free loan payable to the Receiver.
2. Given that the re-purchase price (price multiplier) of the lots is calculated by including the principal, interest, and Belize General Sales Tax as part of the Seller Deceptive Price, then it is inaccurate to label the re-purchase proposal as totally and completely "interest free".
3. The re-purchase price of the lots should merely be based on the market value at point of sale. The proposal of the FTC indirectly front-loads interest at the front of the proposed ten-year loan obligation. To say that the interest bargained for with the Defendants should be reapplied in the ten-year obligation would be inequitable and unfair under the circumstances.
4. The Redress Plan should make necessary disclosures regarding the applied interest in the price multiplier.

DATE: February 18, 2021

Respectfully submitted,

/s/ Greg H. Klebanoff

Greg H. Klebanoff
225 Morton Lane
Winter Springs, Florida 32708
Pro Se Interested Party

/s/ Thuy Ngan Klebanoff

Thuy Ngan Klebanoff
225 Morton Lane
Winter Springs, Florida 32708
Pro Se Interested Party

CERTIFICATE OF FILING

I HEREBY CERTIFIY that the foregoing Objection and Response was sent via FedEx Overnight Mail on February 18, 2021 to be paper filed with the Clerk of Courts, United States District Court, District of Maryland, Southern Division, Greenbelt Location, 6500 Cherrywood Lane, Greenbelt, Maryland, 20770, Phone No. (301) 344-0660.

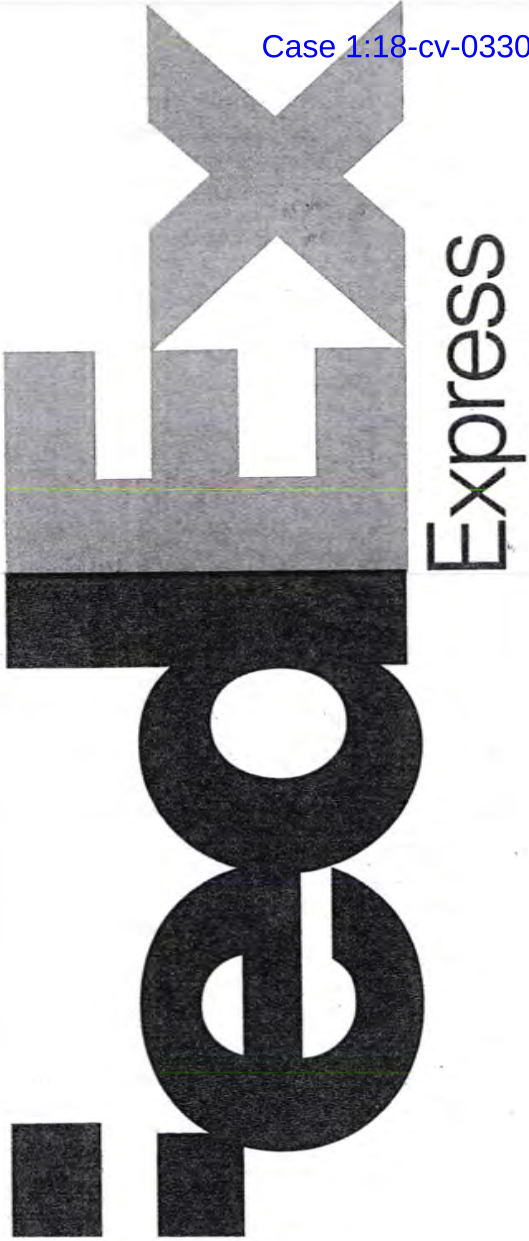
/s/ Greg H. Klebanoff

Greg H. Klebanoff
Pro Se Interested Party

/s/ Thuy Ngan Klebanoff

Thuy Ngan Klebanoff
Pro Se Interested Party

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