

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

***In re* SANCTUARY BELIZE
LITIGATION**

Civil No. PJM 18-3309

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**FINAL
ORDER FOR PERMANENT INJUNCTION AND MONETARY JUDGMENT AGAINST
DEFENDANTS ANDRIS PUKKE, PETER BAKER, AND LUKE CHADWICK**

The Federal Trade Commission (“FTC”) has filed an Amended Complaint for Permanent Injunction and Other Equitable Relief (“Amended Complaint”), pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), and the Telemarketing and Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. §§ 6101-6108, alleging that Defendants Andris Pukke, Peter Baker, and Luke Chadwick violated the FTC Act and the Telemarketing Sales Rule through the deceptive marketing of lots in a development known variously as Sanctuary Bay, Sanctuary Belize, and The Reserve (for ease, “Sanctuary Belize”). Following a trial on the merits, which commenced on January 22, 2020 and concluded on February 12, 2020, and as detailed in the accompanying Memorandum Opinion dated August 28, 2020, the Court has found Pukke, Baker, and Chadwick liable on all counts. To the extent necessary, the Court amends the allegations in the Amended Complaint to conform to the proof at trial. The Court’s reasoning and specific findings are detailed in the Memorandum Opinion dated August 28, 2020.

IT IS THEREFORE ORDERED:

FINDINGS

1. This Court has jurisdiction over this matter.

2. The Amended Complaint charges that Andris Pukke, Peter Baker, and Luke Chadwick, along with their fellow Defendants, controlled and participated in deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, as well as in violation of the Telemarketing Sales Rule, 16 C.F.R. Part 310, in connection with the sale of lots in a development in Belize known as Sanctuary Belize.

3. Although the relevant Findings of Fact are more fully set out in the accompanying Memorandum Opinion, and are incorporated herein, the Court makes the following Findings in accordance with that Opinion:

- a. Since 2005, Pukke, Baker, and their co-Defendants have sold lots in the development known by various names and identified herein as Sanctuary Belize.
- b. For his part, Luke Chadwick controlled or participated in these acts or practices commencing in 2008.
- c. Following the 2008 settlement between the Receiver and Sittee River Wildlife Reserve, Pukke, Baker, and Chadwick took steps to hide Andris Pukke's involvement in Sanctuary Belize, including through Pukke's use of aliases such as "Marc Romeo" and "Andy Storm."
- d. Under the control of Pukke, Baker and Chadwick, and frequently with their direct participation, all Corporate Defendants and Individual Defendants participated in the sale of Sanctuary Belize lots through telemarketers in the United States, while making the following claims, all of which were and are false and material:
 - i. That Defendants used a "no debt" business model to develop Sanctuary Belize which would make lots in Sanctuary Belize a less risky investment than one in which the developer would make payments to lenders;

- ii. That every dollar Defendants collected from Sanctuary Belize lot sales would go back into the development;
- iii. That Defendants would finish Sanctuary Belize quickly, including within two to three years, or within five years;
- iv. That the finished Sanctuary Belize would have all of the amenities expected of an American luxury resort community, such as: (i) a hospital staffed with American physicians and nurses near the development; (ii) an emergency medical center near the downtown “Marina Village;” (iii) a championship-caliber golf course; (iv) a local airport within the development; (v) a new international airport nearby with direct flights to and from the United States; (vi) a “Marina Village” containing high-end boutiques, restaurants, cafes, an American-style grocery store, an elegant casino, and a hotel; and (vii) a 250-slip world-class marina;
- v. That consumers could realize the rapid appreciation of their lots within Sanctuary Belize because there is a robust resale market through which consumers could easily resell their lots should they choose to do so; and
- vi. That Andris Pukke has had no meaningful involvement with Sanctuary Belize or with the Defaulting Corporate Defendants.¹

¹ Defendants also made a claim that lots sold to purchasers would appreciate in value from 100% to 500% within two to three years. As set forth in the Memorandum Opinion, the Court did not find this claim to be a violation of the FTC Act or the TSR.

- e. These representations were likely to mislead consumers acting reasonably under the circumstances, these representations were material, and consumers relied on these representations.
- f. Except for Atlantic International Bank, the Corporate Defendants (including Defaulting Defendants) operated as a common enterprise (“SBE”) in making these claims.
- g. SBE initiates or receives interstate telephone calls from consumers as part of a program to sell services to those consumers.
- h. SBE offers to provide goods and services through telemarketing.
- i. Pukke, Baker, Usher, and Chadwick knew or should have known that the claims identified were false at the time they were made, or were at the least recklessly indifferent to the truth of the claims.
- j. As a result of these false claims, consumers paid the Defendants at least one hundred twenty million, two hundred thousand dollars (\$120,200,000).
- k. Usher and the Defaulting Corporate Defendants are jointly and severally liable with Pukke, Baker, Usher and to an extent, Chadwick.

DEFINITIONS

A. “**Asset**” means any legal or equitable interest in, right to, or claim to, any property, wherever located and by whomever held, whether tangible, intangible, digital, or otherwise, including, but not limited to, digital currencies, virtual currencies, digital tokens, and cryptocurrencies. For clarity, “Asset” includes Receivership Entities themselves, in addition to rights and things the Receivership Entities control.

B. “**Corporate Defendant(s)**” means Global Property Alliance, Inc., Sittee River Wildlife Reserve, Buy Belize, LLC, Buy International, Inc., Foundation Development Management, Inc., Eco-Futures Development, Eco-Futures Belize Limited, Newport Land Group

LLC, Power Haus Marketing, Sanctuary Belize Property Owners' Association, Prodigy Management Group LLC, Foundation Partners, BG Marketing, LLC, Ecological Fox, LLC, Belize Real Estate Affiliates LLC, Exotic Investor LLC, Southern Belize Realty LLC, and Atlantic International Bank Ltd. and each of their subsidiaries, affiliates, successors, and assigns, collectively, individually, or in any combination.

C. **"Defendant(s)"** means the Corporate Defendants, Individual Defendants, and Relief Defendants, collectively, individually, or in any combination.

D. **"Individual Defendant(s)"** means Andris Pukke, Peter Baker, Luke Chadwick, John Usher, Rod Kazazi, Brandi Greenfield, Frank Costanzo, and Michael Santos collectively, individually, or in any combination.

E. **"Real Estate Good or Service"** means any interest in, service related to, or development of, any real estate containing or involving three or more lots or units of any kind.

F. **"Receiver"** means the receiver appointed in Section VI of this Order and any deputy receivers who shall be named by the temporary receiver.

G. **"Receivership Asset"** means any and all Assets ordered to be turned over or relinquished to the Receiver pursuant to this Order.

H. **"Receivership Entities"** means the Corporate Defendants (except Atlantic International Bank, Ltd., Ecological Fox, LLC, BG Marketing, LLC, and Foundation Partners), 2729 Bristol LLC, and 3905 Marcus LLC, as well as any other entity that: (1) was located at, registered to, or operated from 3333 Michelson Drive, Suite 500, Irvine, California as of November 7, 2018, and assists, facilitates, or otherwise conducts business related to the sale of real estate in Belize; (2) assists, facilitates, or otherwise conducts business related to the acts identified in the Findings of Fact in this Order, and is owned or controlled by any Defendant; or (3) Assets that are otherwise in the Receivership and that are corporations or other legal entities.

I. **“Relief Defendant(s)”** means Angela Chittenden, Beach Bunny Holdings LLC, the Estate of John Pukke, John Vipulis, and Deborah Connelly.

J. **“Telemarketing”** means any plan, program, or campaign which is conducted to induce the purchase of goods or services by use of one or more telephones, and which involves a telephone call, whether or not covered by the Telemarketing Sales Rule.

ORDER²

I. BAN ON REAL ESTATE GOODS AND SERVICES

IT IS ORDERED that Pukke, individually, collectively, or in any combination, is permanently restrained and enjoined from advertising, marketing, promoting, or offering for sale, or assisting others in the advertising, marketing, promoting, or offering for sale of any Real Estate Good or Service, whether directly or through an intermediary, including by consulting, brokering, planning, investing, or advising. Further, Baker and Chadwick, individually, collectively, or in any combination, are permanently restrained and enjoined from any involvement with Sanctuary Belize or any future incarnation. Baker, individually, collectively, or in any combination, is also permanently restrained and enjoined from any involvement with the development known as “Kanantik.” The Court defers ruling on Chadwick’s involvement with the development known as “Kanantik.” Nothing herein prohibits the Receiver or any transferee of the Receiver from selling any Receivership Asset, including any Receivership Asset any Receivership Entity controls.

II. BAN ON TELEMARKETING

IT IS FURTHER ORDERED that Pukke, Baker, and Chadwick individually, collectively, or in any combination, are permanently restrained and enjoined from Telemarketing or assisting

² Unless otherwise specified in this or any other order of the Court, injunctive relief shall be permanent in nature and global in geographic application and unlimited in temporal application.

others in Telemarketing in any commercial enterprise whatsoever, whether directly or through an intermediary, including by consulting, brokering, planning, investing, or advising.

III. PROHIBITION AGAINST MISREPRESENTATIONS IN THE SALE OF ANY GOOD OR SERVICE

IT IS FURTHER ORDERED that Pukke, Baker, and Chadwick individually, collectively, or in any combination, and their officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with advertising, marketing, promoting, or offering for sale any good or service of any nature whatsoever, are permanently restrained and enjoined from misrepresenting, or assisting others in misrepresenting, expressly or by implication:

- A. That the use of a “no debt” business model makes an investment less risky than one in which an entity or individual must make payments to lenders;
- B. That every dollar, or the vast majority of dollars, collected from selling the good or service will be used to develop the good or service;
- C. That, unless guaranteed, the good or service will be completed or available within a specified period of time, such as a particular number of weeks, months, or years;
- D. That, unless guaranteed, the good or service will feature specific amenities;
- E. That consumers can realize the appreciation of their good or service because there is a robust resale market through which consumers can easily resell their good or service should they choose to do so;
- F. That any particular person or entity has no meaningful involvement with the relevant business when the person or entity in fact does; and
- G. That any other fact material to consumers concerning any good or service is true, if there is any basis for believing it is not true. This includes, as to any good or service: the total

costs; any material restrictions, limitations, or conditions; or any material aspect of its performance, efficacy, nature, or central characteristics.

IV. EQUITABLE MONETARY JUDGMENT

IT IS FURTHER ORDERED that:

A. Judgment in the amount of one hundred twenty million, two hundred thousand dollars (\$120,200,000) is entered in favor of the FTC against Pukke and Baker, jointly and severally, as equitable monetary relief (“Equitable Monetary Judgment”). Judgment in the amount of ninety-one million, nine hundred and two thousand, seven hundred and twenty-five dollars and ninety-one cents (\$91,902,725.91) is entered in favor of the FTC against Chadwick, jointly and severally with Pukke, Baker, Usher and the Defaulting Corporate Defendants.

B. In accordance with this Order, Pukke, Baker, and Chadwick, their officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, shall transfer to the FTC within thirty (30) days all Assets (other than personal use real estate) subject to the direct or indirect control of Pukke, Baker, or Chadwick less than or equal to the Equitable Monetary Judgment (as reduced by the amounts, if any, already distributed to the FTC), regardless of where they are held and under what name they are held. This transfer shall be made by electronic fund transfer in accordance with instructions provided by a representative of the FTC. *Provided, however*, that Pukke, Baker, and Chadwick may each withhold no more than a total of \$5,000 in such assets other than personal use real estate. If any of them intends to withhold any such funds, he shall within thirty (30) days of entry of this Order provide prior written notice to counsel for the FTC, sworn to under penalty of perjury, that he intends to withhold such Assets and shall submit a written report detailing the source (e.g., employment—and, if so, from what employment—or inheritance or gift—and, if so, from whom and when), the location, and the amount of the funds

being withheld. Should the FTC deem the proposed withholding inappropriate, it may move the Court for appropriate relief.

C. Pukke, Baker, and Chadwick shall forever relinquish and no longer have any rights to any and all Assets previously transferred in fact or by operation of law to the Receiver, pursuant to the prior Temporary Restraining Order (ECF No. 13) entered on November 5, 2018, the Interim Preliminary Injunction (ECF No. 34) entered on November 20, 2018, or the Preliminary Injunction (ECF No. 615) entered on October 3, 2019 (including, without limitation, the Receivership Entities themselves). The Receiver shall retain possession or control of those Assets (including the Receivership Entities themselves) in accordance with the terms of the present Order and the Receiver shall marshal and then liquidate all such assets for the benefit of the FTC, in such sequence and at such time or times as the Receiver in its discretion shall deem appropriate. For clarity, these Assets (including the Receivership Entities themselves) are Receivership Assets. The Receivership Assets (including the Receivership Entities themselves and any Assets turned over to the Receiver in satisfaction of the Equitable Monetary Judgment) shall be held in constructive trust by the Receiver for the sole benefit of the FTC and lot purchasers at Sanctuary Belize, so that the Receiver can disburse assets to the lot purchasers.

D. Pukke, Baker, and Chadwick, and their officers, agents, employees, and attorneys, shall, within thirty (30) days of the entry of this Order, take all steps possible or necessary to transfer to the Receiver all Assets that Pukke, Baker, or Chadwick own or control, directly or indirectly, or which are held for their benefit, that exceed \$2,500 in value (as determined by the Receiver) that they have not otherwise been ordered to transfer pursuant to paragraph B above. Said Defendants shall be entitled to the benefit of any homestead law provided by the State of California. Once the Receiver has disbursed to the FTC an amount equal to the Equitable Monetary Judgment, the provisions of this sub-paragraph IV.D shall no longer apply. For clarity, these Assets are Receivership Assets. Additionally, and also for clarity, Pukke, Baker, and

Chadwick each shall have an ongoing obligation, by the end of each calendar month, to apprise the FTC and Receiver of their total current income (and any change in income) and the acquisition of any additional Assets new or used, worth, or potentially worth, more than \$2,500. Additionally, Pukke, Baker, and Chadwick each shall, within the same time period, report to the Receiver the acquisition, by any means, of any Asset that may be worth \$2,500 or more. Pukke, Baker, and Chadwick each has ongoing obligations to transfer to the FTC, in accordance with instructions from an FTC representative, employment income in an amount up to the maximum allowed under 15 U.S.C. § 1673 (e.g., up to 25% of disposable earnings on a weekly basis), and shall transfer to the Receiver all other Assets, new or used, that they acquire or control, by any other means, valued at more than \$2,500, as determined by the Receiver. For clarity, these provisions necessarily pertain to income and Assets acquired after the entry of this Order and these obligations shall continue in effect until the Receivership has been closed by the Court, the Equitable Monetary Judgment has been fully satisfied, or upon further Order of the Court. If, upon the closure of the Receivership the Equitable Monetary Judgment has not been satisfied, Pukke, Baker, and Chadwick each shall make the same reports detailed above to the FTC and, pursuant to instructions from an FTC representative, transfer income and assets to the FTC or for the FTC's benefit pursuant to those instructions. Pukke, Baker, and Chadwick shall make the required reports to the FTC by email to current FTC counsel of record as well as emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to:

Associate Director for Enforcement, Bureau of Consumer Protection
Federal Trade Commission,
Attn: *In re Sanctuary Belize Litigation*, 18-cv-3309 (D. Md.), FTC File No. X040009
600 Pennsylvania Avenue, NW
Washington, DC 20580.

Within fourteen (14) days after receiving instructions from an FTC representative, Pukke, Baker, and Chadwick shall then transfer, liquidate, and/or dispose of the Asset(s) in accordance with the

FTC's instructions. All reports completed pursuant to this paragraph must be signed and sworn to under penalty of perjury.

E. Pukke, Baker, and Chadwick individually, collectively, or in any combination, and their officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, shall fully cooperate with and assist the FTC and the Receiver with the turnover of Assets pursuant to this Order, and are hereby restrained and enjoined from directly or indirectly:

1. Interfering with the FTC's and Receiver's efforts to manage, or take custody, control, or possession of, the Assets ordered to be turned over to the FTC or the Receiver;
2. Transacting any of the business of any Receivership Entity or any entity that itself is a Receivership Asset;
3. Transferring, receiving, altering, selling, encumbering, pledging, assigning, liquidating, or otherwise disposing of any Assets ordered to be turned over to the FTC or the Receiver; or
4. Refusing to cooperate with the FTC or the Receiver, or the Receiver's duly authorized agents, in the exercise of their duties or authority under any order of this Court.

V. ADDITIONAL MONETARY PROVISIONS

A. Pukke, Baker, and Chadwick shall relinquish dominion and all legal and equitable right, title, and interest in all Assets turned over or relinquished pursuant to this Order and may not seek the return of any Assets, without prior authorization by the Court.

B. All money paid to the FTC pursuant to this Order may be deposited into a fund administered by the FTC or its designee to be used for equitable relief, including consumer redress and any attendant expenses for the administration of any redress fund. Said Defendants

shall have no right to challenge any actions the FTC or its representatives may take pursuant to this paragraph, nor may they otherwise challenge the ultimate disposition of the Assets turned over to the FTC or the Receiver.

C. Within thirty (30) days following the entry of this Order, Defendants Pukke, Baker, and Chadwick each shall complete and submit to the FTC and the Receiver the attached Financial Statement of Individual Defendant. Thereafter, Pukke, Baker, and Chadwick each shall recomplete and submit to the FTC and the Receiver the same form (or similar form to be provided by the FTC) upon one (1) year following the entry of this Order and must recomplete and submit to the FTC that same form every year thereafter until they receive notice from the FTC that they need not continue to complete such forms or they have satisfied in full the Equitable Monetary Judgment. Each such form must be submitted with all of the required and specified attachments. Each such form must be signed and sworn to under penalty of perjury. The forms must be submitted electronically to FTC counsel of record in this matter in a manner to be specified by FTC counsel. Additionally, the forms must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to:

Associate Director for Enforcement, Bureau of Consumer Protection
Federal Trade Commission
Attn: *In re Sanctuary Belize Litigation*, 18-cv-3309 (D. Md.), FTC File No. X040009
600 Pennsylvania Avenue, NW
Washington, DC 20580.

D. The asset freeze imposed on Pukke, Baker, and Chadwick pursuant to the prior Temporary Restraining Order (ECF No. 13) entered on November 5, 2018, Interim Preliminary Injunction (ECF No. 34) entered on November 20, 2018, or Preliminary Injunction (ECF No. 615) entered on October 3, 2019, is hereby modified to the extent necessary to permit the transfers identified in the Equitable Monetary Judgment Section. Upon full satisfaction of the Equitable Monetary Judgment, the FTC shall make a full report of satisfaction, at which time the Court, upon review and approval of the report, shall dissolve the asset freeze.

E. Upon full satisfaction of the Equitable Monetary Judgment, closure of the Receivership, or a subsequent order of the Court, following formal notice by the Receiver to the Court that the Receiver is satisfied that Pukke and Baker have fully transferred to the Receivership all Assets that they hold greater in value than \$2,500 (as determined by the Receiver), the Receiver shall return to Pukke and Baker any passports it holds in their names within thirty (30) days of the giving of notice. The FTC, Pukke, and Baker shall have an opportunity to comment upon such proposed transfer of passports. The return of a passport shall not be construed as a concession that Pukke or Baker has turned over all Assets he is required to turn over pursuant to this Order or that he has satisfied the Equitable Monetary Judgment.

VI. RECEIVER

IT IS FURTHER ORDERED that Robb Evans & Associates LLC is appointed as Receiver for all Assets ordered to be turned over to the Receiver pursuant to this Order. It shall have full powers of an equity receiver. The Receiver shall be solely the agent of this Court in acting as Receiver under this Order.

VII. DUTIES AND AUTHORITY OF RECEIVER

IT IS FURTHER ORDERED that the Receiver is directed and authorized to accomplish the following:

- A. Take exclusive control, custody, and possession of all Receivership Assets.
- B. Conserve, hold, manage, and prevent the loss of all Receivership Assets, and perform all acts necessary or advisable to preserve the value of those Assets. The Receiver shall assume control over the income and profits therefrom and all sums of money now or hereafter due or owing to any entity that is a Receivership Asset or otherwise due or owing to Pukke, Baker, or Chadwick as a result of any Receivership Assets. The Receiver shall have full power to sue for, collect, and receive, all Receivership Assets. *Provided, however,* that the Receiver shall not, without prior Court approval, attempt to collect any amount from a consumer if the Receiver

believes the consumer's debt has resulted from deceptive acts or practices or other violations of law.

C. Liquidate, through fair market sales or similar transactions, all Receivership Assets, following a motion and order from the Court approving the sale or liquidation. The Receiver shall take steps to attempt to obtain the full fair market value of any Asset that is obtained by the Receivership estate in any sale or liquidation.

D. Disburse periodically to the FTC, lot purchasers, or other third parties as provided by separate Court order, less its Court-approved fees and expenses or reasonably anticipated potential expenses including, without limitation, expenses or liabilities not yet known at the time of the disbursements, as approved by the Court. At the time of a periodic disbursement to the FTC, the Receiver shall also disburse to the FTC the amount of any and all withheld prior anticipated potential expenses that were not in fact incurred.

E. Choose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable or necessary in the performance of duties and responsibilities under the authority granted by this Order;

F. Make payments and disbursements from the Receivership estate that are necessary or advisable for carrying out the directions of, or exercising the authority granted by, this Order, and to incur, or authorize the making of, such agreements as may be necessary and advisable in discharging his or her duties as Receiver. The Receiver shall apply to the Court for prior approval of any payment of any debt or obligation incurred, except payments that the Receiver deems necessary or advisable to secure Receivership Assets, such as rental payments;

G. Enter into and cancel contracts and purchase insurance as advisable or necessary;

H. Prevent the inequitable distribution of Assets and determine, adjust, and protect the interests of consumers who have transacted business with Pukke, Baker, Chadwick, any entity that is a Receivership Asset, or the Receivership Entities;

I. Make an accounting, as soon as practicable, of the Receivership Assets and financial condition of the Receivership and file the accounting with the Court and deliver copies thereof to all parties;

J. Institute, compromise, adjust, appear in, intervene in, defend, dispose of, or otherwise become party to any legal action in state, federal, or foreign courts, or arbitration proceedings as the Receiver deems necessary and advisable to preserve or recover the Receivership Assets, or to carry out the Receiver's mandate under this Order, including but not limited to actions challenging fraudulent or voidable transfers;

K. Demand from any person or entity documents and records pertaining to the Receivership Assets within three (3) days after delivery of the Order by mail, courier, email, or other method by which the recipient receives a copy of this Order, in addition to obtaining discovery pursuant to the Federal Rules of Civil Procedure, including subpoenas seeking documents and/or testimony under Rule 45;

L. Open one or more bank accounts at designated depositories for funds of the Receivership estate. The Receiver shall deposit all funds of the Receivership estate in such designated accounts and shall make all payments and disbursements from the Receivership estate from such accounts. The Receiver shall serve copies of monthly account statements on all parties;

M. Maintain accurate records of all receipts and expenditures incurred as Receiver;

N. Cooperate with reasonable requests for information or assistance from any state or federal civil or criminal law enforcement agency;

O. Suspend business operations of any entity that is a Receivership Asset if in the judgment of the Receiver such operations cannot be continued legally and profitably; and

P. If in the Receiver's judgment the business operations of any Receivership Asset cannot be continued legally and profitably, take all steps necessary to ensure that any of the web

pages or websites relating to the activities of the Receivership Asset cannot be accessed by the public, or are modified for consumer education and/or informational purposes, and take all steps necessary to ensure that any telephone numbers associated with the Receivership Asset cannot be accessed by the public, or are answered solely to provide consumer education or information regarding the status of operations.

VIII. STAY OF ACTIONS

IT IS FURTHER ORDERED that, except by leave of this Court, during the pendency of the Receivership ordered herein, Defendants and their officers, agents, employees, attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, and their corporations, subsidiaries, divisions, or affiliates, and all investors, creditors, stockholders, lessors, customers and other persons seeking to establish or enforce any claim, right, or interest against or on behalf of Defendants, and all others acting for or on behalf of such persons, are hereby enjoined from taking any action that would interfere with the exclusive jurisdiction of this Court over the Receivership Assets, including, but not limited to:

A. Filing or assisting in the filing of a petition for relief under the Bankruptcy Code, 11 U.S.C. § 101 *et seq.*, or of any similar insolvency proceeding on behalf of any entity that is a Receivership Asset;

B. Commencing, prosecuting, or continuing a judicial, administrative, or other action or proceeding against any of the Receivership Assets or otherwise seeking an interest in any of the Receivership Assets, including the issuance or employment of process, except that such actions may be commenced if necessary to toll any applicable statute of limitations;

C. Filing or enforcing any lien on any Receivership Asset, taking or attempting to take possession, custody, or control of any Receivership Asset; or attempting to foreclose, forfeit, alter, or terminate any interest in any Receivership Asset, whether such acts are part of a judicial proceeding, are acts of self-help, or otherwise.

Provided, however, that this Order does not stay: (1) the commencement or continuation of a criminal action or proceeding; (2) the commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power; or (3) the enforcement of a judgment, other than a money judgment, obtained in an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power.

IX. COMPENSATION OF RECEIVER

IT IS FURTHER ORDERED that the Receiver and all personnel hired by the Receiver as herein authorized, including counsel to the Receiver and accountants, are entitled to reasonable compensation for the performance of duties pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them, from the Assets now held by, in the possession or control of, or which may be received by, the Receivership estate. The Receiver shall file with the Court and serve on the parties periodic requests for the payment of such reasonable compensation, with the first such request filed no more than sixty (60) days after the date of entry of this Order. The Receiver shall not increase the hourly rates used as the bases for such fee applications without prior approval of the Court. Whenever the Receiver submits such a request for payment, or at other times within the Receiver's discretion, the Receiver shall also submit a report regarding: (1) the steps taken by the Temporary Receiver to implement the terms of this Order; (2) the value of all liquidated and unliquidated Receivership Assets; (3) the sum of all liabilities of any Receivership Asset; (4) the steps the Receiver intends to take in the future to (a) prevent any diminution in the value of the Receivership Assets and (b) acquire additional Assets from Pukke, Baker, Chadwick, or any other person or entity; and (5) any other matter which the Receiver believes should be brought to the Court's attention. *Provided, however*, if any of the required information would hinder the Receiver's ability to pursue Assets, the portions of the Receiver's

report containing such information may be redacted and be filed for the Court's benefit under seal without service on the parties.

X. CUSTOMER INFORMATION

IT IS FURTHER ORDERED that Pukke, Baker, and Chadwick individually, collectively, or in any combination, and their officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, are permanently restrained and enjoined from directly or indirectly:

A. Failing to provide sufficient customer information to enable the FTC to efficiently administer consumer redress. If a representative of the FTC requests in writing any information related to redress, Pukke, Baker, and Chadwick each shall provide it, in the form prescribed by the FTC, within fourteen (14) days.

B. Otherwise disclosing, using, or benefitting from customer information, including the name, address, telephone number, email address, social security number, other identifying information, or any data that enables access to a customer's account (including a credit card, bank account, or other financial account), that Pukke, Baker, or Chadwick obtained prior to entry of this Order; and

C. Failing to destroy such customer information in all forms in their possession, custody, or control within thirty (30) days after receipt of written direction to do so from a representative of the FTC.

Provided, however, that customer information need not be disposed of, and may be disclosed, to the extent requested by a government agency or required by law, regulation, or court order.

XI. ACKNOWLEDGMENT OF RECEIPT OF ORDER

IT IS FURTHER ORDERED that Pukke, Baker, and Chadwick shall submit acknowledgments of receipt of this Order as follows:

A. Pukke, Baker, and Chadwick each shall, within seven (7) days of entry of this Order, submit to the FTC a written acknowledgment of receipt of this Order, sworn to under penalty of perjury.

B. For each of twenty (20) years after entry of this Order, for any business that Pukke, Baker, or Chadwick, individually or collectively with any other Defendants, is the majority owner of, or controls directly or indirectly, said Defendant shall deliver a copy of this Order to: (1) all principals, officers, directors, and LLC managers and members; (2) all employees having managerial responsibilities for marketing, sales, or operations; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery of a copy of this Order must occur within seven (7) days of entry of this Order for current personnel. For all others, Pukke, Baker, and Chadwick shall deliver a copy of this Order before they assume their responsibilities with any such business.

C. From each individual or entity to which Pukke, Baker, or Chadwick delivers a copy of this Order, that Defendant shall obtain, within 30 days, a signed and dated acknowledgment of receipt of this Order.

XII. COMPLIANCE REPORTING

IT IS FURTHER ORDERED that Pukke, Baker, and Chadwick shall make timely submissions to the FTC:

A. One year after entry of this Order, Pukke, Baker, and Chadwick shall each submit a compliance report, sworn to under penalty of perjury, which shall:

1. (a) identify their primary physical, postal address, email address, and telephone number, as designated points of contact, which representatives of the FTC may use to communicate with Defendant; (b) identify all of that Defendant's businesses, whether owned or controlled by them, directly or indirectly, giving all of their names, telephone numbers, and

physical, postal, email, and Internet addresses; (c) describe the activities of each such business, including the goods and services offered, the means of advertising, marketing, and sales, and the involvement of any other Defendant (which each must describe the other Defendant in detail, including the other Defendant's title, position, compensation, and duties); (d) describe in detail whether and how each Defendant's involvement in each such business is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment sought and obtained pursuant to this Order, unless previously submitted to the FTC.

2. Additionally, in such compliance report, Pukke, Baker and Chadwick shall: (a) identify all telephone numbers and all their physical, postal, email and Internet addresses, including all residences used by them; (b) identify all business activities, including any business for which such Defendant performs services whether as an employee or otherwise and any entity in which such Defendant has any ownership interest, whether directly or indirectly; and (c) describe in detail such Defendant's involvement in each such business, including title, role, responsibilities, participation, authority, control, and any ownership.

B. For each of twenty (20) years after entry of this Order, Pukke, Baker, and Chadwick each shall submit a compliance report, sworn to under penalty of perjury, within fourteen (14) days of any change in the following:

1. (a) any designated point of contact for them; or (b) the structure of any entity that Defendant has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including details as to the creation, merger, sale, or dissolution of the

entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order.

2. Additionally, each must report any change in: (a) name, including aliases or fictitious name, or residence address of the Defendant; or (b) any title or role in any business activity, including any business for which a Defendant performs services whether as an employee or otherwise and any entity in which such Defendant has any ownership interest, and identify the name, physical address, and any Internet address of the business or entity.

C. Pukke, Baker, and Chadwick each shall submit to the FTC notice of the filing of any bankruptcy petition, insolvency proceeding, or similar proceeding by or against such Defendant, within fourteen (14) days of any such filing.

D. Any submission to the FTC required by this Order to be sworn under penalty of perjury must be true and accurate and must comply with 28 U.S.C. § 1746, such as by concluding: "I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: _____" and supplying the date, the signatory's full name, title (if applicable), and signature.

E. Unless otherwise directed by an FTC representative in writing, all submissions to the FTC pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: *In re Sanctuary Belize Litigation*, 18-cv-3309 (D. Md.), FTC File No. X040009.

F. Notwithstanding any other provision herein, Pukke must maintain the email address ekkup@msn.com, Baker must maintain the email address peterbakerx@gmail.com, and Chadwick must maintain the email address luketchadwick@gmail.com. Also notwithstanding

any other provision herein, service of any notice, process, or other item that requires any form of delivery shall be valid if the FTC serves it: (1) to the appropriate aforementioned email address of the Defendant; (2) to any other email address identified by the Defendant to whom service is directed; or (3) by any other method reasonably calculated to achieve actual notice to the Defendant.

XIII. ALIASES AND NOMINEES

IT IS FURTHER ORDERED that Pukke, Baker, and Chadwick individually, collectively, or in any combination, and their officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, are permanently restrained and enjoined from, directly or indirectly, engaging in any business or commercial activity of any sort in which Pukke, Baker, or Chadwick has consented to, or acquiesced to, the use of an alias or pseudonym by them, for them or for any individual associated with them and are further permanently restrained and enjoined from, directly or indirectly, engaging in any business or commercial activity of any sort through the use of nominees, strawmen, or any other manner by which their ownership or control is obscured or hidden.

XIV. RECORDKEEPING

IT IS FURTHER ORDERED that Pukke, Baker, and Chadwick each shall create certain records for twenty (20) years after entry of the Order, and shall retain each such record for five (5) years. Specifically, for any business that Pukke, Baker, or Chadwick, individually or collectively with any other Defendants, is a majority owner or controls directly or indirectly, each such business shall create and retain the following records:

- A. accounting records showing the revenues from all goods or services sold;

B. personnel records showing, for each person providing services, whether as an employee or otherwise, that person's: name; addresses; telephone numbers; job title or position; dates of service; and (if applicable) the reason for termination of such person's services;

C. records of all consumer complaints and refund requests, whether received directly or indirectly, such as through a third party, and any response;

D. all records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the FTC; and

E. a copy of each unique advertisement or other marketing material of the business.

XV. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring the compliance of Pukke, Baker, and Chadwick with this Order, including any failure on their part to transfer any assets as required by this Order or otherwise to collect on the Equitable Monetary Judgment:

A. Within fourteen (14) days of receipt of a written request from a representative of the FTC, each Defendant shall: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce appropriate documents for inspection and copying. The FTC is authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including telephonic depositions), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the FTC is authorized to communicate directly with Pukke, Baker, and Chadwick. Pukke, Baker, and Chadwick shall permit representatives of the FTC to interview any employee or other person affiliated with any entity any of them may own or control, directly or indirectly, who has agreed to such an interview. The person interviewed may have counsel present.

C. The FTC may use all other lawful means to interact with Pukke, Baker, Chadwick, or any individual or entity they are associated or affiliated with, including posing

undercover through its representatives, as consumers, suppliers, or other individuals or entities, without the necessity of identification or prior notice.

D. Nothing in this Order shall limit the FTC's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

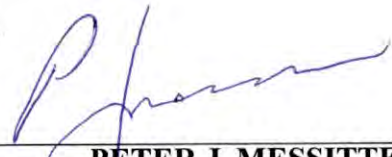
E. Upon written request from a representative of the FTC, any consumer reporting agency must furnish consumer reports concerning Pukke, Baker, and Chadwick, pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. §1681b(a)(1).

F. As should already be clear, the parties must at all times act reasonably and in good faith. Unreasonable requests for information or unreasonable refusal to comply with such requests may result in sanctions, including the payment of attorneys' fees.

XVI. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO ORDERED, this 12 day of JAN, 2021.



PETER J. MESSITTE
UNITED STATES DISTRICT JUDGE