

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

*In re* SANCTUARY BELIZE  
LITIGATION

Civil No. 18-3309-PJM

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**REPRESENTED DEFENDANTS’ RESPONSE TO FEDERAL TRADE COMMISSION’S  
MOTION FOR SURREPLY TO PUKKE DEFENDANTS’ PROPOSED ORDER**

In its proposed Sur-Reply, the Federal Trade Commission (“FTC”) says it opposes the Receiver’s return of passports to Represented Defendants Andris Pukke and Peter Baker for the reasons it gave in its Reply in Support of its Motion to Reform and Reaffirm Final Orders. In that Reply, the only reason the FTC gave for opposing the return of Pukke’s and Baker’s passports was that: “Until Pukke and Baker comply with Section V.E. of the De Novo Order, or its equivalent, the Receiver should keep their passports.” ECF Dkt. No. 1408 at 3.

However, that is precisely why the Receiver *should* return Pukke’s and Baker’s passports. Section V.E of the De Novo Order (ECF Dkt. No. 1194 at 13) provides that the Receiver “shall return to Pukke and Baker any passports it holds in their names within thirty (30) days of the giving of notice” that they have made “full satisfaction of the Equitable Money Judgment.” The Fourth Circuit vacated the Equitable Money Judgment. Therefore, full

satisfaction of it by Pukke and Baker is moot, and the Receiver should return Pukke's and Baker's passports within 30 days.<sup>1</sup>

Dated: April 19, 2023

Respectfully submitted,

/s/ John B. Williams

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*Counsel for the Represented Defendants and Entities*

### **CERTIFICATE OF SERVICE**

I certify that today, April 19, 2023, I served the foregoing Represented Defendants' Response to the Federal Trade Commission's Motion for Surreply to the Pukke Defendants' Proposed Order by filing it via the Court's CM/ECF system, which automatically will transmit a copy electronically to all counsel of record.

/s/ Neil H. Koslowe

Neil H. Koslowe

Attorney.

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<sup>1</sup> As the FTC notes, defendant Pukke is required to surrender his passport to the U.S. Pretrial Service Agency in connection with his indictment in the United States District Court for the Southern District of New York. Therefore, either the Receiver should return Pukke's passport to him so that he can transfer it to the U.S. Pretrial Service Agency, or the Receiver should return it to the U.S. Pretrial Service Agency on Pukke's behalf.