

PXD

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

In re SANCTUARY BELIZE LITIGATION

No: 18-cv-3309-PJM

**DECLARATION OF JONATHAN COHEN
PURSUANT TO 28 U.S.C. § 1746**

I have personal knowledge of the facts set forth below and am competent to testify about them. I am a United States citizen over the age of 18. I am counsel to the FTC in the above-captioned matter. If called as a witness, I could and would testify as follows:

1. Throughout this matter, the agency's efforts have included substantial contributions from officials and experts with experience in consumer economics, communications, redress, and other areas of core Commission expertise. To develop the Proposed Redress Plan, DE 1117-1, the FTC relied substantially on that consumer protection expertise coupled with ongoing dialogue with the Receiver and Government of Belize.
2. The FTC also met with the advisory Committee to discuss general plan parameters and issues.
3. Although the Commission cannot speak with every consumer individually—the FTC nevertheless communicated with dozens of consumers individually, including Craig Hibbert.
4. The Receiver has also regularly disseminated information to consumers, including information about the Plan.
5. Some consumers have reported to the FTC that they feel “intimidated” by objectors.

Executed in Washington, D.C. on March 12, 2021.

/s/ Jonathan Cohen