ankura

In re Sanctuary Belize Litigation

18-cv-3309 (D. Md.) (PX)

Receiver Report of Activities for the Period May 1, 2026 to August 31, 2026

Submitted: October 29, 2026

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I. EXECUTIVE SUMMARY

Marc-Philip Ferzan of Ankura Consulting Group, LLC (the "Receiver") respectfully submits this report to the United States District Court for the District of Maryland (the "District Court" or "Court") to provide an update regarding relevant receivership administration and oversight activities that occurred during the four-month reporting period[1] from May 1, 2026 through August 31, 2026 (the "Reporting Period"), unless otherwise indicated.[2]

By way of background, the receivership estate was established in late 2018 with the purpose of, among other things, enabling a receiver to take control of certain assets, including the vast real estate assets comprising the Sanctuary Belize and Kanantik development areas that were the subject of a massive fraud scheme perpetrated by the defendants. The Court's controlling orders contemplated that an original appointed receiver, and subsequently the instant Receiver appointed in October of 2021, would seek to liquidate available receivership assets and distribute the proceeds to eligible victims of the defendants' crimes in the form of redress payments. As of October 19, 2026, Receivership Team efforts resulted in the distribution of $37,262,810.30 in payments that had been accepted by consumers pursuant to three rounds of court-ordered redress.

Over the most recent Reporting Period, and through the submission date of this report, the Receivership Team continued to make progress on distributing second round redress funds to qualifying Sanctuary Belize and Kanantik consumers. Simultaneously, efforts were undertaken to wind down responsibilities in anticipation of concluding the receivership and moving the Court to

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[1] Periodic receivership progress reporting for the benefit of the Court and stakeholders generally covers four-month intervals over the calendar year. Unless circumstances dictate otherwise, the Receivership Team expects to continue to follow this cadence until the conclusion of the receivership.

[2] All capitalized terms that are not otherwise defined herein shall have the meaning ascribed to them in the Redress Plan and/or the Court's orders.

dissolve the estate. Accordingly, following entry of the Court's January 12, 2026 Order granting the Receivership Team's motion to issue redress payments of nearly $23 million to eligible Sanctuary Belize and Kanantik consumers (the "Second Redress Payment Order"), the Receivership Team implemented a number of initiatives to promote the acceptance of funds to consumer victims before the end of the receivership. Resources were directed to provide focused customer support and reissue payments for individuals who were unable to deposit initial checks due to unique circumstances, involving things like deceased beneficiaries, divorce scenarios, and bankruptcy compliance. Through October 19, 2026, the coordination of second round redress administration resulted in the acceptance of 1,634 payments totaling approximately $22,663,666.72, which corresponds to the acceptance of 99.24% of the funds distributed.

In an effort to reconcile potential liabilities and maximize the amount of available redress for consumer victims, on March 23, 2026, the Receivership Team had filed a motion seeking a determination that the estate was *not* required to pay any pre-receivership, non-consumer creditor claims (the "Pre-Receivership Creditor Motion"). Among other things, the Pre-Receivership Creditor Motion highlighted the substantial losses incurred by the consumer victims who will not be made whole given the nature, scope, and extent of defendants' misconduct. On June 12, 2026, the Court entered an order granting the motion (the "Pre-Receivership Creditor Order").

In light of the resolution of potential Receivership payment obligations of significant non-consumer creditor claims in accordance with the Pre-Receivership Creditor Order, the Receivership Team filed a motion on July 27, 2026 seeking authorization to make the third *pro rata* distribution to Sanctuary Belize consumers of up to approximately $5.9 million,[3] while reserving budgeted

[3] The third distribution included only Sanctuary Belize consumers because available receivership estate funds apportioned to Kanantik were accounted for as part of the second redress distribution round in accordance with the Court's Second Redress Payment Order.

funds to complete the estate's wind down and dissolution. On August 17, 2026, the Court entered an order granting the Receivership Team's motion (the "Third Redress Payment Order"), while further providing that all corresponding redress distributions must be accepted and deposited by eligible consumers within 60 days from the date of issuance, barring extenuating circumstances, to enable an expeditious conclusion of the estate. Otherwise, under the Third Redress Payment Order, such payments will revert to the receivership estate for reallocation in connection with anticipated final wind down procedures to be submitted to the Court for approval.

In an effort to effectively coordinate the third round of redress payments, the Receivership Team: (i) provided consumers with advance notice of the distribution, including the 60-day deadline to accept payments; (ii) engaged with consumers to process mailing address updates, as well as payment accommodation requests in situations with extenuating circumstances; (iii) addressed complex payment scenarios, including those involving death, divorce and bankruptcy; (iv) drafted and posted updated customer support materials, including FAQs, to the receivership website; and (v) calculated redress payment amounts in accordance with the terms of the Third Redress Payment Order to facilitate check printing and other anticipated payment administration logistics.

Third round payments were issued to eligible Sanctuay Belize consumers beginning on September 23, 2026. As of October 19, 2026, a total of approximately 964 (78.82%) of these payments had been accepted, corresponding to approximately $4,648,105.11 in additional redress funds successfully transferred to consumer victims. In accordance with the Court's orders, it is anticipated that if receivership funds remain at the conclusion of the estate, any such funds will be allocated in coordination with guidance from the Federal Trade Commission ("FTC" or "Commission") and, ultimately, at the direction of the Court.

To the extent that eligible consumers may have questions concerning redress payments after reviewing notices conveyed via email communications, as well as reference materials available on the receivership website, **inquiries to dedicated customer service resources should be directed by email to Payment@SanctuaryBelizeRedress.com as soon as possible – particularly in consideration of the Court-ordered 60-day deadline for eligible consumers to accept redress payments**. Separately, if consumers have questions regarding the Belize developments and/or future potential opportunities to acquire lots, they should contact First Belize Investment Market Ltd. through Matt Medoruma at mmedoruma@mainst.biz.

II. DISTRIBUTION OF ADDITIONAL REDRESS PAYMENTS

A. The Status of the Second Round of Redress Payments

As previously reported, on October 24, 2025, the Receivership Team filed a motion seeking authorization to make a second round of redress payments on a *pro rata* basis in the aggregate amount of nearly $23 million (the "Second Redress Payment Motion"). The second redress round supplemented the initial authorized distribution of $10 million to eligible Sanctuary Belize consumers in the latter half of 2023. Notably, the Second Redress Payment Motion included a request for the Court to authorize redress payments to eligible Kanantik and other qualifying development area consumers[4] – in addition to eligible Sanctuary Belize consumers – following the

[4] As previously reported, the defendants' wrongdoing resulted in certain "other" consumer claims being eligible, which were not directly affiliated with Sanctuary Belize or Kanantik per the definitions in the Redress Plan. More particularly, the misconduct impacted Redress Plan-qualifying sales in Bamboo Springs (Belize), Palmaya (Belize), Rancho Del Mar (Costa Rica), and Playa Cortez (Mexico). There are approximately 58 of these "other" eligible claims that were validated through the Claims Application process. After reviewing the controlling definitions and the Court's guidance, as well as conferring with the FTC, these "other" development area claims have been treated as Kanantik claims for purposes of calculating the most recent round of redress payments.

sale of the Sanctuary Belize and Kanantik development areas in June 2025.[5] On January 12, 2026, the Court granted the motion and entered the Second Redress Payment Order, which enabled the Receiver to allocate $20,000,000 for distribution to eligible Sanctuary Belize consumers on a *pro rata* basis, and $2,836,838.22 for distribution to Kanantik and other covered development area consumers utilizing the same a *pro rata* methodology. The Second Redress Payment Order also provided for the establishment of a reserve of approximately $5.325 million – in addition to the lot proceeds being held in escrow for consumers who completed their closing, but had not yet confirmed receipt of title[6] – for the payment of expenses of the receivership estate. These expenses included, at the time, potential pre-receivership creditor claims.

On February 5, 2026, the survey and redress administration vendor began distributing more than 1,600 payments to eligible consumers at the direction of the Receivership Team. The vast majority of redress payments were sent by check via U.S. Mail to previously-documented addresses provided by eligible consumers, with some limited exceptions that resulted in the transmittal of wires due to extenuating circumstances that prevented consumers from accepting payment by check. If there were multiple owners listed in a Claim Application, a single payment was generally

[5] As described in prior reporting, there were no cash proceeds available to make redress payments to Kanantik or other covered development area lot purchasers at the time of the first distribution because the Redress Plan contemplated that such payments are to come from the liquidation of Kanantik assets (of which none had been sold prior to the June 26, 2025 closing). And, because Kanantik historically lacked liquid assets, funds were in effect borrowed from Sanctuary Belize-designated cash assets to enable necessary operations and maintenance that were unique to Kanantik.

[6] Pursuant to the Stipulated Order Authorizing Measures to Assist Consumers During the Redress Process entered on December 28, 2023 (the "Redress Process Order"), all consumers who elected to complete the purchase of their lot pursuant to the Lot Choice Survey process retain the right of recission (subject to certain conditions) if title is not transferred by the Government of Belize within the timeframes established therein (extending up to three years from closing). In accordance with the Redress Process Order, the receivership estate has held additional funds paid by consumers to complete the purchase of their lot in escrow pending confirmation from the consumer that title has been formally transferred.

issued to all the eligible owners at the most recent mailing address provided by the lead claimant.[7] Over the Reporting Period, the Receivership Team, in coordination with the survey and redress administration vendor, reissued checks and provided assistance to consumers who were required to produce additional documentation due to death, bankruptcy, and other unique scenarios. In cases where redress funds were not previously accepted by eligible consumers, they were automatically added to third round distribution payments accordingly (as described below).

The following table reflects, as of October 19, 2026, the aggregate number of payments issued and accepted as part of the second round of redress, including a breakdown by development area.

Table 1
Redress Payments Issued & Accepted (Second Round Only)
As of October 19, 2026

Development Area	Number of Payments Issued	Dollar Amount of Payments Issued	Number of Payments Accepted	Percentage of Payments Accepted (by payments issued)	Dollar Amount of Payments Accepted	Percentage of Payments Accepted (by dollar amount)
Sanctuary Belize	1,217	$20,000,000.01	1,200	98.60%	$19,904,059.66	99.52%
Kanantik	447	$2,836,838.09	434	97.10%	$2,759,607.06	97.28%
Total	1,664	$22,836,838.10	1,634	98.20%	$22,663,666.72	99.24%

B. Discharge of Pre-Receivership Creditor Claims

Having initiated payments to all eligible consumers in connection with the second round of redress, the Receivership Team continued efforts to resolve the remaining administration and other

[7] The joint check required all listed parties (including co-owners, business entities, trusts, estates, and IRAs) to endorse it. Consumers maintain responsibility for complying with any legal and regulatory requirements associated with their business entity, trust, estate, or IRA in connection with receiving and directing check proceeds.

responsibilities of the estate. In an effort to maximize the amount of redress paid to consumer victims and resolve potential liabilities, the Receiver, on March 23, 2026, filed the Pre-Receivership Creditor Motion, which requested that the Court exercise its broad equitable authority to determine that consumer claims take priority over non-consumer creditor claims.[8]

In support of the motion, the Receivership Team asserted, among other things, that: (i) pursuant to the Redress Plan and two of the Court's judgments, the assets and funds recovered by the receivership are to be held in a constructive trust for the benefit of consumers and, therefore, consumer claims should take priority over non-consumer claims; (ii) paying consumers ahead of non-consumer creditors is fair and equitable given that the victims – many of whom are retirees and lost substantial sums – will not be made whole given the nature, scope, and extent of defendants' misconduct; and (iii) in light of the limited remaining funds available, implementing a claims allowance and distribution process for non-consumer creditors would impose additional administrative costs, delay final resolution of the matter and, ultimately, further reduce the funds available to victim consumers. On June 12, 2026, the Court granted the Pre-Receivership Creditor Motion and entered the Pre-Receivership Creditor Order determining that the Receiver is not required to pay any portion of any claims which are held or may be held by non-consumer creditors of the receivership estate.[9]

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[8] On a parallel track, the Receivership Team also formally contacted the Internal Revenue Service ("IRS"), which was not subject to the Pre-Receivership Creditor Motion, regarding the pendency of certain historical assessments against defendant Andris Pukke that dated back more than 21 years and totaled in excess of $2 million, to seek confirmation that the agency does not intend to assert any claims against the receivership estate. The Receivership Team directed that, if the IRS contends it has one or more tax claims against the estate, notice of the same be provided by no later than June 10, 2026. The Receivership Team did not receive any response from the IRS.

[9] The Order further provides that, for the avoidance of doubt, the ruling does not apply to any potential federal tax claims.

C. The Initiation of the Third Round of Redress Payments

Following the Court's entry of the Pre-Receivership Creditor Order – which increased the amount available for redress relative to the extinguishment of potential pre-receivership claims – the Receivership Team filed a motion (the "Third Redress Payment Motion") seeking to disburse $5,891,913.46 in additional redress to Sanctuary Belize consumers[10] with Claim Applications deemed eligible in accordance with the notifications provided by the Receiver on or about February 9, 2023 (the "Eligible Claim Notifications"). On August 17, 2026, the Court entered the Third Redress Payment Order, which included the following provisions:

- the calculation for *pro rata* distribution payments shall be based on the Amount Paid set forth in the Eligible Claim Notification for each Sanctuary Belize lot divided by the aggregate Amounts Paid set forth in all Eligible Claim Notifications associated with Sanctuary Belize lots;
- the distribution amount may be increased in the event any additional individual lot purchase proceeds are released from escrow prior to the Receiver directing the printing of redress checks;[11]

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[10] As previously referenced, the Third Redress Payment Motion included only Sanctuary Belize consumers because all receivership estate funds apportioned to Kanantik were previously distributed as part of the second round of redress.

[11] As referenced in footnote 6, pursuant to the Redress Process Order, all consumers who proceeded to purchase their lot as part of the Lot Choice Survey process retain the right of recission (subject to certain conditions) if title is not transferred by the Government of Belize within the timeframes established therein (extending up to three years from closing). Any additional funds paid by consumers to complete the purchase of their lot have been held in escrow pending confirmation from the consumer that title has transferred. Following two rounds of outreach by the Receivership Team, one consumer confirmed receipt of title after the filing of the Third Redress Payment Motion, resulting in the total distribution increasing from $5,891,913.46 to $5,896,685.20.

- all redress distributions must be accepted and deposited by eligible consumers within 60 days from the date of issue barring extenuating circumstances – otherwise, such payments shall revert to the receivership estate;
- the receivership estate is authorized to reserve the remaining funds in the estate of approximately $600,000, in addition to the individual lot purchase proceeds that are not released from escrow, including for the payment of expenses of the receivership estate;
- all determinations relating to, among other things, the administration of the consumer claims process and the consumer Lot Choice Survey, the sale or other disposition of assets of the receivership estate, and ownership rights relative to Sanctuary Belize and Kanantik lots are final; and
- the exercise of all powers, duties, and responsibilities undertaken by the Receiver and his agents (among others) in accordance with the Court's orders shall not be subject to challenge through litigation or motion practice without first obtaining leave of court based on a sufficient showing that the asserted claim is made in good faith, has not been previously resolved based on prior orders or established case law, and is otherwise cognizable.

Following entry of the Third Redress payment Order, the Receivership Team immediately undertook preparatory steps similar to those coordinated in anticipation of the distribution of the second round of redress payment earlier in 2026 to ensure an efficient process. The Receivership Team, among other things: (i) prepared correspondence to consumers providing detailed information regarding their redress payment, including the amount they were to receive and how their payment was calculated, as well as direction to deposit their payment within 60 days of issuance; (ii) evaluated and processed requests for name changes, address updates, wire transfers (in

extenuating circumstances), issuance of payments to more than one individual, and recognition of powers of attorney; (iii) proactively engaged with consumers to address and resolve a series of unique and more complex scenarios, including divorce, death, and bankruptcy issues; (iv) conducted targeted outreach campaigns by email and telephone to consumers with undeposited funds from previous distributions in an attempt to provide additional notice of the availability of redress and obtain accurate mailing information for the third distribution;[12] and (v) coordinated with the redress payment administrator regarding the logistics associated with redress check issuances. On September 23, 2026, the Receiver initiated the third round of redress to eligible Sanctuary Belize consumers.

The following tables reflect, as of October 19, 2026, the aggregate number of payments issued and accepted as part of the third round of redress to Sanctuary Belize consumers, as well as the aggregate number of payments issued and accepted across all three rounds of redress payments, including a breakdown by development area.

Table 2
Redress Payments Issued & Accepted (Third Round Only)
As of October 19, 2026

Development Area	Number of Payments Issued	Dollar Amount of Payments Issued	Number of Payments Accepted	Percentage of Payments Accepted (by payments issued)	Dollar Amount of Payments Accepted	Percentage of Payments Accepted (by dollar amount)
Sanctuary Belize	1,223	$5,896,685.21	964	78.82%	$4,648,105.11	78.83%

[12] As an accommodation to the limited number of Sanctuary Belize consumers who did not previously accept earlier payments, the Receivership Team included their previously undeposited prior payment in the third round redress distribution. The Receivership Team also reissued payments to all Kanantik consumers who did not previously accept their prior payment as part of the second-round distribution.

Table 3
Redress Payments Issued & Accepted (All Rounds)
As of October 19, 2026

Development Area	Number of Payments Issued	Dollar Amount of Payments Issued	Number of Payments Accepted	Percentage of Payments Accepted (by payments issued)	Dollar Amount of Payments Accepted	Percentage of Payments Accepted (by dollar amount)
Sanctuary Belize	3,645	$35,862,775.67	3,365	92.32%	$34,503,203.24	96.21%
Kanantik	447	$2,836,838.09	434	97.10%	$2,759,607.06	97.28%
Total	4,092	$38,699,613.76	3,799	92.84%	$37,262,810.30	96.29%

Given the short timeline allotted for the acceptance of redress payments by the Third Redress Payment Order, the Receivership Team has expedited the reissuance of payments in response to consumer requests stemming from changes in addresses and other extenuating circumstances. As of October 19, 2026, it was necessary to reissue and direct 19 payments to consumers. To further promote consumer participation, the Receivership Team has sent additional reminders to all consumers who have not accepted payments, advising them of the deadline and the imminent wind-down of the receivership estate. The Receivership Team is also endeavoring to work through all remaining documentation issues associated with more challenging redress payment scenarios involving unique scenarios as expeditiously as possible.

III. CUSTOMER SUPPORT ENGAGEMENT

As mentioned above, the Receivership Team continued to offer a variety of customer support resources to provide information regarding the redress payment distribution process, the status of wind-down efforts, the entry of Court orders, and other matters. The Receivership Team, among other things: (i) posted updates to the receivership website landing page with links to relevant court filings; (ii) posted a series of updated FAQs; (iii) issued correspondence to

consumers regarding their redress payment; and (iv) continued to promote, and direct consumers to, the Payment@SanctuaryBelizeRedress.com email address for consumer-related inquires. Support for consumers will be ongoing as the 60-day deadline to accept redress payments approaches.

Consumer engagement was relatively limited during the first three months of the Reporting Period, followed by an expected uptick in August 2026 coinciding with the entry of the Third Redress Payment Order. The survey and redress administration vendor received and responded to more than 200 inquiries (more than half of which occurred in August). In addition, the Receivership Team addressed approximately 125 other consumer inquiries concerning topics that included the redress payment distribution timeline, reissue requests, the status of wind-down activities, and other matters that required escalation by the survey and redress payment administration vendor.

IV. ACCOUNTING AND FINANCIAL STATEMENTS

The financial data reflected in the statements below show the current net assets in the receivership estate, net of redress distributions, as well as net recoveries after expenses through August 31, 2026 - unless otherwise specified. Historical operating expenses of Sanctuary Belize and Kanantik[13] were generally recorded on a cash basis as payments were approved and issued.[14]

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[13] As mentioned above, the Receivership Team conserved, managed and preserved the Kanantik development area for the benefit of consumers, despite the historical lack of liquid Kanantik assets to support operations and maintenance costs. Consequently, related costs incurred in connection with addressing Kanantik responsibilities were satisfied by applying other receivership estate funds. As reflected in the tables in this section of the Report, the Receivership Team accounted for Kanantik and Sanctuary Belize expenditures separately.

[14] Due to the impending wind down of the receivership estate, the Receivership closed the Timed Deposit account in February 2026 and transferred the balance of the account to the receivership's interest-bearing savings account. Approximately $3.1 million of the Timed Deposit accounts funds withdrawn were immediately utilized in the second round redress payment distribution, while the remaining funds continued to be held in the Receivership savings account. The Receivership has since utilized a portion of the remaining funds for the third round redress payment distribution.

In connection with the Lot Choice Survey Program, during its administration the receivership estate collected and held in escrow approximately $900,000, net of associated expenses. These funds represented additional potential revenue from the receipt of principal payments made by consumers who elected to proceed to closing in order to acquire their lots. Recognizing that there can be governmental delays associated with the processing of title transfers, as referenced above, the Court's Redress Process Order provides that consumers who proceeded to closing, but did not receive title within six months, have an ongoing right, subject to the terms and conditions as set forth therein, to cancel their reformed contracts and obtain a refund of any additional principal payments made at closing. To assess the progress of title transfers, the Receivership Team conducted two separate rounds of outreach to 23 consumers who entered into reformed contracts and paid additional principal at closing to determine whether they had received legal title. Ten consumers confirmed that they have received title, resulting in $261,570.28 of associated principal payments being designated for release from escrow. To date, none of the remaining 13 consumers have proceeded to terminate their reformed contract. The Receivership Team plans to continue engaging with these consumers to track the status of title transfers as wind-down efforts continue. [15]

In consideration of the foregoing, below are the Statement of Net Assets and Statement of Net Recoveries for the four-month Reporting Period.

[15] For the 13 consumers who have not yet confirmed receipt of title, the Receivership Team has encouraged them to contact the attorney who assisted them with their closing and/or the Belize Lands Department to expedite the transfer of title, as proactive outreach has historically proven effective in securing title records more quickly.

In re Sanctuary Belize Receivership
Statement of Net Assets

		As of August 31, 2026
Assets:		
Cash		$ 7,161,278
Accrued interest on timed deposit	(1)	-
Total assets		**$ 7,161,278**
Liabilities:		
Allocated redress payment distribution per Jan 12, 2026 Court Order	(2)	$ 76,229
Ankura professional fees and expenses	(3)	181,397
Barnes & Thornburg professional fees and expenses	(3)	30,270
Mojdehi Galvin Rego professional fees and expenses	(3)	16,848
Other accounts payable		70,958
Total liabilities		**375,702**
Net assets available		**$ 6,785,576**

Footnotes:

(1) In April 2024, the Receiver transferred $10.63 million to a Citibank Timed Deposit account with an interest rate of 4.6% and a maturity date of September 3, 2024. On the maturity date, the receivership estate received the $10,670,443 deposit plus interest of $42,826.15. Starting on September 3, 2024, the Receiver began rolling over the balance in the timed deposit account plus interest earned on a monthly basis. The Timed Deposit was closed on February 2, 2026, and the balance of $9,403,573.99 was transferred to the Receivership savings account.

(2) This liability accounts for redress payments that were issued but had not yet been accepted by consumers as of August 31, 2026, in addition to holdbacks for Post-Filing Transferee claims that were ultimately determined to be ineligible by the Court.

(3) These amounts payable reflect the pending fee application requests relating to Ankura, Barnes & Thornburg, and Mojdehi Galvin Rego invoices as of August 31, 2026 in accord with the guidelines set forth in the Court's June 18, 2024 Order Regarding Billing Guidelines for the Receiver and its Counsel. Pursuant to the Order, a 10% holdback is also applied in connection with fee application requests and accounted for as a payable until the Court considers the holdback amounts as part of a final fee request submitted at the close of the receivership.

In re Sanctuary Belize Receivership
Statement of Net Recoveries

		For the Period May 1, 2026 to August 31, 2026	From Inception to August 31, 2026
Recoveries:			
Atlantic International Bank settlement		$ -	$ 23,000,000
Previously reported recoveries		-	20,786,502
Belize Property Assets Sale		-	20,500,000
Consumer Lot Purchases		-	1,000,168
Other collections		-	1,263,387
Interest income		61,523	1,946,656
Total recoveries		**$ 61,523**	**$ 68,496,713**
Disbursements:			
Redress payment distributions	(1)	$ -	$ 32,881,158
Expenses:			
Sanctuary Belize operating expenses			
Payroll		-	6,205,403
Equipment, maintenance, and supplies		-	3,014,097
Employment taxes		-	1,009,051
Property taxes and other government payments		-	563,516
General, administrative, and other expenses		-	1,273,406
Legal fees and costs		-	1,178,749
Total Sanctuary Belize operating expenses		-	13,244,223
Kanantik operating expenses			
Payroll		-	431,075
Equipment, maintenance, and supplies		-	66,590
Employment taxes		-	44,422
Property taxes and other government payments		-	100,572
General, administrative, and other expenses		-	201,243
Legal fees and costs		-	45,197
Total Kanantik operating expenses		-	889,099
Real estate property expenses		-	1,811,981
Corporate entity expenses		-	80,859
Other expenses	(2)	12,704	1,543,246
Receiver fees and expenses			-
Ankura fees and expenses		78,354	5,373,459
REA fees and expenses		-	2,847,275
Barnes & Thornburg fees and expenses		878	2,840,273
Mojdehi Galvin Rego fees and expenses		13,115	88,479
Arnold & Porter Kaye Scholer fees and expenses		-	111,084
Total receiver fees and expenses		92,347	11,260,571
Total distributions & expenses		**105,051**	**61,711,137**
Net recoveries/ (distributions & expenses)		**$ (43,528)**	**$ 6,785,576**

Footnotes:

(1) Pursuant to the June 2023 Order, $10 million was allocated for Sanctuary Belize consumer redress payments, and an aggregate of $9,889,861.09 was transferred to eligible beneficiaries as of April 30, 2026. Pursuant to the Second Redress Payment Order, $22,915,067.46 (which included certain redress payments that had not been previously accepted following the first distribution) was allocated for Sanctuary Belize and Kanantik consumer redress payments, all of which was transferred to vendor, Rust Consulting. Pursuant to the Third Redress Payment Order, $5,896,685.21 was allocated for the third round of Sanctuary Belize redress payments, all of which was transferred to vendor, Rust Consulting.

(2) Other expenses includes costs for customer support services provided by vendor Rust Consulting, as well as payments for records storage.

V. COURT PROCEEDINGS

Over the Reporting Period, the Receivership Team was not required to engage in any ancillary receivership legal proceedings. An overview of the status of the Andris Pukke criminal proceedings is set forth below:

- As previously reported, on July 10, 2024, a jury returned verdicts of guilty on each of the two counts in the indictment charging Mr. Pukke with wire fraud and obstruction of an official proceeding, respectively.
- On September 9, 2024, Mr. Pukke filed a motion for judgment of acquittal or new trial, which the Court denied on July 25, 2025.
- On September 22, 2025, the Court sentenced Mr. Pukke to 8 years in prison, with 3 years of supervised release. Following an extension, Mr. Pukke was ordered to begin service of his sentence by December 3, 2025. In addition, the United States District Court for the Southern District of New York ordered Mr. Pukke to forfeit $9,912,396.[16]
- On September 25, 2025, Mr. Pukke filed a notice of appeal of his conviction and sentence.
- As of June 25, 2026, briefing of the appeal was completed.
- Oral argument is scheduled for November 23, 2026.

[16] The U.S. Attorney's Office stated in a September 23, 2025 press release that Mr. Pukke stole nearly $10 million from Sanctuary Belize for, among other things, the purchase and renovation of a waterfront home, the repayment of a personal loan, personal investments in startup companies, child support payments, purchase of land in the Bahamas, and payments to family and friends. The press release recognized the FTC for the assistance it provided with the case and noted that consumer victims sent nearly 200 letters to the Court describing the harm they endured.

VI. CONCLUSION

Approximately eight years since the establishment of the receivership estate, substantial progress has been achieved to meet the goals and requirements of the Court's orders, including liquidating available receivership assets and distributing the proceeds to eligible consumers in the form of redress payments. Indeed, over the Reporting Period, the Receivership Team – following entry of the Pre-Receivership Creditor Order – initiated a third round of redress totaling approximately $5.9 million in additional authorized payments for eligible Sanctuary Belize consumers. As of October 19, 2026, an aggregate of $4,648,105.11 in third-round redress funds had been accepted by consumers. Therefore, in addition to the nearly $10 million accepted by consumers after the first redress round was administered in 2023, and the nearly $23 million that was accepted by consumers after the second distribution in early 2026, as of October 19, 2026, total of $37,262,810.30 in redress payments had been provided to victim consumers by the receivership from inception.

Pursuant to the Court's Third Redress Payment Order, consumers have 60 days to accept payments following issuance, barring extenuating circumstances. It is anticipated that any remaining funds will be directed in accordance with guidance from the FTC for such use as the Commission deems appropriate, and in accordance with the Court's approval. With the objectives of the receivership having been largely accomplished, the Receivership Team is undertaking the necessary work to complete the third redress distribution, as well as all remaining administrative responsibilities, so that it may seek to bring the estate to a conclusion as soon as practicable through the filing of a final motion.

To the extent that eligible consumers have questions concerning redress payments after reviewing communications and reference materials available on the receivership website, **inquiries**

should be directed to dedicated customer service resources via email at Payment@SanctuaryBelizeRedress.com as soon as possible in consideration of the 60-day deadline to accept redress payments. Prior to the dissolution of the receivership estate, consumers will continue to be apprised of the status of other pertinent developments through email communications, website updates, reporting, and other direct consumer communications.

By: _____

Marc-Philip Ferzan
Receiver

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