

The Honorable Peter J. Messitte  
United States District Court  
District of Maryland, Southern Division

RE: In re Sanctuary Belize Litigation, No. 18-cv-3309-PJM (D. Md.) Redress Plan

Judge Messitte,

The undersigned owners of Sanctuary Belize wish to call to your attention several concerns we have with regard to the Redress Plan proposed by the FTC. We ask that your honor consider these concerns and require the FTC to modify the plan accordingly. These concerns are as follows:

1. Proposed Sittee River Bridge requirement, PXA Section I, 39. “Minimum Development Tasks mean ... (5) completing a bridge (including associated permitting, entitlements and roadwork) over the Sittee River to connect New Sanctuary to the road to Hopkins, Belize on the other side of the Sittee River...”
  - a. This is a new requirement. No such bridge has ever been previously discussed with any consumer or proposed at any time as an infrastructure element for the Sanctuary Belize development.
  - b. Design and engineering for the structure and approaches, addressing environmental concerns, and obtaining government approvals would likely take years even before construction could start. This is a navigable river. The design would need to allow for passage of small vessels.
  - c. This will be a very expensive and time consuming undertaking. It will cost millions that should be spent on infrastructure & amenities. It will ultimately reduce the funds available for consumer redress.
  - d. It will provide limited benefit to the development while creating an additional major security exposure. Upgrading the existing bridge on All Pines Road (which floods annually during heavy seasonal rains) would be a better use of funds.
  - e. This ill-conceived requirement should not be arbitrarily imposed by the FTC or the Court. New Sanctuary owners should have the final say.

2. Goals of the Redress Plan include Consumer Choice. “Wherever possible, the Redress Plan furthers consumer choice.” However the plan falls short in this regard. Many aspects of New Sanctuary are undefined or incomplete leaving consumers to make major financial decisions with insufficient knowledge of the consequences.
  - a. The plan has no list of minimum amenities the new developer will be required to complete. How are consumers to evaluate the long term value and desirability of New Sanctuary without understanding what amenities a developer is committed to provide?
  - b. Sanctuary Belize was primarily marketed as an ecological preserve & wildlife sanctuary with CCRs (later RCC&Es) that provided some assurance that it would be maintained as such. The redress plan makes no mention of these issues. Is New Sanctuary committed to this concept? If so, how will consumers be assured that these concerns will be addressed going forward? What is proposed with regard to the existing RCC&Es which are recorded against the master title of the development and include entities which are no longer part of the New Sanctuary universe?
  - c. The plan proposes to incorporate a new HOA. How can consumers make an informed decision without reviewing at least a draft of the articles of association and/or bylaws of the HOA?
  - d. Answers to these questions should be included in the Redress Plan

The following Sanctuary Belize Owners ask the Court to carefully consider these comments.

Jerry & Stephanie Brown – E17

David & Cindy Reeves – NR639, NR576

Phillip & Angela Watford – SR183

Caroline Bartley – E30

Tim & Sharon Gagne – S187, S224

Michael Curley – NR399

Rob Coley – E89

Gardiner MacDermot – ER7

Anthony Henson – R5

Carolyn Anson Walker – SR186

Dale & Dianne Allen – S17

Dianna Shultz – E62

Tamera Guilinger – E62

Colleen Bigler – NR508

Karen Maher Carl – E174

Lizabeth Middleton – LP22

Chris Gallagher – LP144, NR643

Elizabeth Misner – S241

Racquel Coerbell – SR205

Charles Barrett - LP222

Lawrence Richer – E155

Valery Arend – SR59

Ben Sommers – NR458

Steven & Deborah Nisenoff – E42, SR130