

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
SOUTHERN DIVISION

In re SANCTUARY BELIZE LITIGATION

No: 18-cv-3309-PJM

**MOTION FOR ORDER APPROVING SETTLEMENT AGREEMENT AND RELEASE
BETWEEN RECEIVER AND LEE NOBMANN**

Receiver Robb Evans & Associates LLC (“Receiver”), the Receiver appointed as permanent receiver pursuant to, among other orders, the Preliminary Injunction as to Defendants Andris Pukke, Peter Baker, Luke Chadwick, John Usher, Certain Corporate Defendants, and the Estate of John Pukke (Doc. 615) and the Stipulated Order for Permanent Injunction and Monetary Judgment Against Defendant Michael Santos (Doc. 820) (“Santos Judgment”), hereby moves the Court for an order approving the Settlement Agreement and Release (“Settlement Agreement”) entered into between the Receiver and Lee Nobmann (“Nobmann”), a copy of which is attached to the Declaration of Brick Kane as Exhibit 1. Pursuant to the Santos Judgment, Michael Santos transferred, assigned and relinquished to the Receiver, for liquidation and ultimate payment to the Federal Trade Commission (“FTC”), all rights Michael Santos may have in five parcels of real property commonly described as (a) 17085 Birch Hill Road, Riverside, California (“Riverside Property”); (b) 1807 Coastal Way, Costa Mesa, California (“Costa Mesa Property”); (c) 460 Lindberg Circle, Petaluma, California (“Petaluma Property”); (d) 14070 Falling Leaf Road, Apple Valley, California (“Apple Valley Property”); and (e) 7862 Chase Avenue, Hesperia, California (“Hesperia Property”). (Collectively, the five properties are referred to herein as the “Santos Properties.”) The Settlement Agreement provides, among other

things, that in exchange for Nobmann's payment of \$350,000 to the Receiver, the Receiver transfers, assigns and relinquishes to Nobmann or his assignee all rights that the Receiver may have in the Santos Properties. The Settlement Agreement further contains general and mutual releases between the Receiver and Nobmann.

This Motion is made and based upon the Memorandum of Points and Authorities and Declaration of Brick Kane which are filed and served concurrently herewith.

Dated: March 24, 2020

Respectfully submitted,

/s/ Gary Owen Caris
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