

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
SOUTHERN DIVISION**

In re SANCTUARY BELIZE LITIGATION
(proposed)

FEDERAL TRADE COMMISSION

Plaintiff,

v.

AMERIDEBT, INC. et al.

Defendants.

No: _____¹

[UNDER SEAL]

**DO NOT DOCKET/
MOTION TO DELAY ECF PENDING**

No: 03-cv-3317-PJM

**FEDERAL TRADE COMMISSION’S MOTION TO HOLD ANDRIS PUKKE, PETER
BAKER, AND JOHN USHER IN CONTEMPT FOR FAILING TO TURN THE
SANCTUARY PARCEL OVER TO THE RECEIVER**

Andris Pukke, Peter Baker, and John Usher defied this Court’s repeated orders to turn over a parcel of land in Belize (the “Sanctuary Parcel”) to the Receiver in this matter, resulting in significant financial harm to the *FTC v. AmeriDebt* victims. *See* DE122, 473, 571, 572, 604, 614, and 625. The Court has broad authority to compensate the FTC’s and consumers’ losses, including turnover orders and coercive incarceration. *United States v. United Mine Workers of Am.*, 330 U.S. 258, 303-04 (1947); *Int’l Union, United Mine Workers of Am. v. Bagwell*, 512 U.S. 821, 828 (1994); *Shillitani v. United States*, 384 U.S. 364, 370–71 (1966); *Hicks v. Feiock*, 485 U.S. 624, 632-35 (1988); *Enovative Techs., LLC v. Leor*, 110 F. Supp. 3d 633, 637 (D. Md. 2015). For the reasons detailed in the accompanying memorandum of law, the FTC, therefore,

¹ Currently pending before the Court is a motion to consolidate this matter with the related *FTC v. Ecological Fox LLC* (“*Ecological Fox*”) matter, pursuant to Rule 42, under the joint case name *In re Sanctuary Belize Litigation*.

moves the Court to order that Pukke, Baker, and Usher finally turn over the Sanctuary Parcel to the Receiver on pain of coercive incarceration.

Respectfully submitted,

Dated: October 31, 2018



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