

ROBB EVANS & ASSOCIATES LLC

**Receiver of the Assets of
DebtWorks, Inc., and
Andris Pukke**

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**Federal Trade Commission v. Ameridebt, Inc., et al.
CASE No. PJM 03-3317**

**Appendix of Exhibits in Support of Receiver's Application for
Order to Show Cause as to why Andris Pukke and Peter Baker Should Not
be Held in Contempt of Court and for Related Relief**

Filed October 23, 2006

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

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

AMERIDEBT, INC., et al.,

Defendants.

Civil Action No. PJM 03-3317

**APPENDIX OF EXHIBITS IN SUPPORT OF RECEIVER'S APPLICATION FOR
ORDER TO SHOW CAUSE AS TO WHY ANDRIS PUKKE AND PETER BAKER
SHOULD NOT BE HELD IN CONTEMPT OF COURT AND FOR RELATED RELIEF**

Robb Evans & Associates LLC as Receiver ("Receiver") pursuant to this Court's Preliminary Injunction Order with Asset Freezem, Appointment of a Receiver, Repatriation of Assets, and Other Equitable Relief dated April 20, 2005 (the "Preliminary Injunction Order") hereby submits its Appendix of Exhibits filed concurrently with the pleading identified above.

Dated: October 23, 2006

MCKENNA LONG & ALDRIDGE LLP

By: /s/ Gary Owen Caris

GARY OWEN CARIS

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EXHIBITS TO DECLARATION OF GARY OWEN CARIS

- | | |
|----------------|---|
| Exhibit No. 1 | Pukke's IRS Form 433-A Financial Statement |
| Exhibit No. 2 | Attachment A to the Preliminary Injunction Order |
| Exhibit No. 3 | Letter from Receiver's counsel to Pukke's counsel dated June 3, 2005 |
| Exhibit No. 4 | Letter from Pukke's counsel to Receiver's counsel dated June 9, 2005 |
| Exhibit No. 5 | Letter from Receiver's counsel to Pukke's counsel dated June 17, 2005 |
| Exhibit No. 6 | Excerpts from Transcript of Deposition of Pukke taken on July 12 and July 13, 2005 |
| Exhibit No. 7 | Addendum A to Pukke's Motion to Modify Order Appointing Receiver to Facilitate Compliance with 11 U.S.C. section 543 |
| Exhibit No. 8 | Summary of Schedules and Schedules of Assets, Schedules A and B, filed by Pukke on July 27, 2005 in the Bankruptcy Court for the Central District of California |
| Exhibit No. 9 | Excerpts from Transcript of Deposition of Angela Chittenden taken on October 12, 2005 |
| Exhibit No. 10 | Excerpts from Transcript of Deposition of Stephen Todd Cook taken on November 16, 2005 |
| Exhibit No. 11 | Excerpts from Transcript of Deposition of Brian Maller taken on December 13, 2005 |
| Exhibit No. 12 | Excerpts from Transcript of Deposition of Janis Pukke taken on May 22, 2006 and September 14, 2006 |
| Exhibit No. 13 | Excerpts from Transcript of Deposition of Tina Norris taken on January 14, 2005 |

- Exhibit No. 14 Email exchanges between Gary Caris, counsel for the Receiver and Steve Mercer, counsel for Brian Maller
- Exhibit No. 15 Letter from Receiver's counsel to Baker's counsel and Pukke's counsel dated August 21, 2006
- Exhibit No. 16 Letter from Roger Friedman, counsel for Baker, to Receiver's counsel dated August 28, 2006
- Exhibit No. 17 Transcript of September 12, 2006 hearing on Baker's second motion for protective order
- Exhibit No. 18 Order dated October 6, 2006 issued by Magistrate Judge Laporte ruling on Baker's second motion for protective order
- Exhibit No. 19 Excerpts of Transcript of Deposition of Baker taken on September 26, 2006

EXHIBITS TO DECLARATION OF BRICK KANE

- Exhibit No. 20 Register of Directors or Managers of Dolphin Development and the shareholder allotment record filed with the Registrar of Companies in Belize
- Exhibit No. 21 Register of Directors or Managers of Sittee River and the Companies Certificate identifying the subscribers of Sittee River
- Exhibit No. 22 Deed recorded to the Dolphin Development property
- Exhibit No. 23 Deed recorded to the Sittee River property
- Exhibit No. 24 Minutes of the Board of Directors of Dolphin Development for the meeting held on September 21, 2003
- Exhibit No. 25 Minutes of the Board of Directors of Dolphin Development for the meeting held on May 13, 2005

- Exhibit No. 26 Minutes of the Board of Directors of Dolphin Development for the meeting held on July 15, 2005
- Exhibit No. 27 Minutes of the Board of Directors of Dolphin Development for the meeting held on October 6, 2005
- Exhibit No. 28 Minutes of the Board of Directors of Sittee River for the meeting held on June 21, 2003
- Exhibit No. 29 Minutes of the Board of Directors of Sittee River for the meeting held on October 7, 2005
- Exhibit No. 30 Dolphin Development Balance Sheet dated as of September 30, 2005 and Profit and Loss Statement for the period from April through September 2005
- Exhibit No. 31 Sittee River Balance Sheet dated as of November 11, 2005 and Profit and Loss Statement for the period from April 1 through November 11, 2005
- Exhibit No. 32 Print out of the Sanctuary Bay Estates website printed in August 2005
- Exhibit No. 33 Print out of Sanctuary Bay Estates website printed on September 25, 2006
- Exhibit No. 34 Fictitious business name filing made by Baker for Starfish Development Limited recorded with the Orange County Recorder's Office on December 21, 2005
- Exhibit No. 35 Balance Sheet as of May 31, 2006 and Profit and Loss Statement for Starfish Development Limited from December 28, 2005 through May 31, 2006
- Exhibit No. 36 E-mail exchange between Baker, Pukke and the Medhursts with an initial date of April 23, 2005
- Exhibit No. 37 E-mail exchange between Baker and Anthony Hunt with copies to Pukke from the end of April 2005 through May 17, 2005

- Exhibit No. 38 E-mail exchange between Medhursts and Pukke dated May 22, 2005
- Exhibit No. 39 E-mail dated July 23, 2005 from Pukke to Baker
- Exhibit No. 40 E-mail dated July 29, 2005 from Pukke to Baker
- Exhibit No. 41 E-mail dated August 3, 2005 from Pukke to Anthony Hunt
- Exhibit No. 42 E-mail dated August 9, 2005 from Miranda Bernard to Media Partners Publishing directed to Joan Medhurst with a copy to Baker
- Exhibit No. 43 E-mail dated September 9, 2005 from Colin Medhurst to Rodwell Williams with a copy to Baker
- Exhibit No. 44 E-mail dated September 15, 2005 from Colin Medhurst to Baker
- Exhibit No. 45 E-mail exchanges spanning dates from September 13, 2005 to September 20, 2005 addressing a detailed set of issues regarding Baker's plan to eliminate Dolphin Development as well as its assets
- Exhibit No. 46 E-mail identified as "contracts and new companies" from Baker to Rodwell Williams dated October 17, 2005
- Exhibit No. 47 E-mail exchange entitled "re: company's" from Baker to amandaatinfo@alphaservicesltd.com dated October 18, 2005
- Exhibit No. 48 "E-fax" letter on Dolphin Development letterhead to Scotiabank (Belize) dated October 17, 2005 from Baker
- Exhibit No. 49 "E-fax" letter from Marvin D. Goodman & Associates, Architects and Planners dated September 15, 2005 to Baker
- Exhibit No. 50 E-mail to Tony Coleman dated August 1, 2005

- Exhibit No. 51 Series of e-mails among Baker, his sister Maya Baker, and Stella Storm, Pukke's mother, the latest of which is dated July 19, 2005
- Exhibit No. 52 E-mail from Stella Storm entitled "DDB banking info" dated July 29, 2005
- Exhibit No. 53 E-mail dated July 7, 2005 from Baker
- Exhibit No. 54 Certificate of Incorporation for Sanctuary Bay Limited, as well as the filings setting forth the allotted shares and shareholders and the Copy of the Register of Directors or Managers of Sanctuary Bay Limited filed November 3, 2005 with the Belize Registry
- Exhibit No. 55 Title Searches on the property owned by Dolphin Development
- Exhibit No. 56 Registrar's Certificate from Nevis for Starfish Development Limited
- Exhibit No. 57 Purchase Offer for the Emerald Bay Property signed by Angela Chittenden in May 2005 and Amended Escrow Instructions
- Exhibit No. 58 Bank statements from Baker's Citibank account for the period from April 11, 2005 through July 11, 2005
- Exhibit No. 59 Loan application submitted by Baker for \$3,547,500 Countrywide loan
- Exhibit No. 60 Loan application submitted by Baker for \$645,000 Countrywide loan
- Exhibit No. 61 Loan application submitted by Baker for \$1,600,000 HELOC from Countrywide
- Exhibit No. 62 Request for Verification of Rent or Mortgage Account
- Exhibit No. 63 Checks to Keith Waring in the sum of \$1,500 each for rent dated in June 2005 and July 2005

- Exhibit No. 64 Disbursement instructions and wire transfer instructions confirming the disposition of \$940,000 in Baker's account at Provident Bank & Trust of Belize Ltd.
- Exhibit No. 65 Walker Crips statement of Sportingbet stock held by Baker
- Exhibit No. 66 E-mail communications between Baker and patrick@playersonly.com
- Exhibit No. 67 E-mails from the Baker Google e-mail account of Baker with Fong Li of Walker Crips
- Exhibit No. 68 Closing statement for sale of Sportingbet stock
- Exhibit No. 69 Communications between CJ Light and Pukke
- Exhibit No. 70 Contract with CJ Light to perform architectural services pertaining to the Emerald Bay property executed by 69 Emerald Bay, LLC
- Exhibit No. 71 Excerpts of the 2002/2003 Annual Report of Sportingbet
- Exhibit No. 72 Spreadsheet prepared by the accounting staff of the Receiver summarizing payments paid to Imagine from DebtWorks and Infinity
- Exhibit No. 73 Spreadsheet prepared by the accounting staff of the Receiver summarizing payments made by Imagine to Sportsline USA
- Exhibit No. 74 Spreadsheet prepared by the accounting staff of the Receiver from banking records of Worldwide
- Exhibit No. 75 Spreadsheet prepared by the accounting staff of the Receiver from the banking and other records of Worldwide obtained by the Receiver pursuant to a subpoena
- Exhibit No. 76 Pukke's February 2004 loan application to acquire the residence at 35 Ocean Heights, Newport Beach, California

- Exhibit No. 77 Account summary and analysis of the 5390 Account prepared by the Receiver's accounting staff
- Exhibit No. 78 Letter from "Internet Opportunity, Inc." signed by "German de Bustos" dated August 13, 1998
- Exhibit No. 79 Letter from Gary Hoyle of Internet Opportunity Entertainment, Inc. dated December 20, 2002