

**ROBB EVANS & ASSOCIATES LLC**

**Receiver of the Assets of**

**DebtWorks, Inc., and**

**Andris Pukke**

11450 Sheldon Street

Sun Valley, California 91352-1121

Telephone No.: (818) 768-8100

Facsimile No.: (818) 768-8802

**Federal Trade Commission v. Ameridebt, Inc., et al.**

**CASE No. PJM 03-3317**

**Stipulation for Conditional Release of Peter Baker from Incarceration  
Subject to Compliance with Court Orders**

**Filed May 15, 2007**

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

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Civil Action No. PJM 03-3317
	)	
AMERIDEBT, INC., et al.,	)	
	)	
Defendants.	)	

---

**STIPULATION FOR CONDITIONAL RELEASE OF PETER BAKER FROM  
INCARCERATION SUBJECT TO COMPLIANCE WITH COURT ORDERS**

Robb Evans & Associates LLC as Receiver over the assets of Andris Pukke and DebtWorks, Inc. (“Receiver”), plaintiff Federal Trade Commission (“FTC”) and contemnor Peter Baker (“Baker”), by and through their counsel of record, hereby stipulate and agree as follows:

WHEREAS, on March 30, 2007, the Court entered various orders in connection with the Receiver’s application to hold Andris Pukke (“Pukke”) and Baker in contempt of Court, including the order entitled Order Holding Andris Pukke and Peter Baker in Contempt of Court filed March 30, 2007 (“Contempt Order”);

WHEREAS, on May 2, 2007, following the filing of the Receiver’s Application for Supplemental Relief Under Order Holding Andris Pukke and Peter Baker in Contempt of Court; Request for Immediate Incarceration of Andris Pukke and Peter Baker to Coerce Compliance With Court Orders (“Receiver’s Application”) and the FTC’s Application for Immediate Incarceration (“FTC Application”), the Court conducted a hearing on the Receiver’s Application and the FTC’s Application and ordered the immediate incarceration of Pukke and Baker as reflected in the Order for Immediate Incarceration of Andris Pukke and Peter Baker to Coerce Compliance with Court Orders (“Incarceration Order”) entered May 4, 2007;

WHEREAS, the Receiver and the FTC do not believe that continued incarceration of Baker at this time will have a further coercive effect upon him so as to materially enhance the prospects of Baker purging his contempt;

WHEREAS, Baker has not purged his contempt of Court but has promised his continued cooperation with the Receiver under the Contempt Order and the Incarceration Order to purge his contempt of Court; and

WHEREAS, under the circumstances, the Receiver and the FTC recommend that Baker be released from incarceration under the terms and conditions of this Stipulation for the purpose of complying with the terms and conditions of the Contempt Order and the Incarceration Order;

NOW, THEREFORE, the parties hereto do stipulate and agree as follows:

1. Baker shall be immediately and conditionally released from his incarceration in the Charles County Detention Center, subject to re-incarceration if Baker fails to fully and strictly comply with his duties under the Contempt Order to fully purge his contempt by fulfilling Baker's turnover duty and duty of cooperation concerning the Concealed Assets as set forth in the Contempt Order and the Incarceration Order.

2. Without limiting the generality of the foregoing, Baker specifically agrees that his release from incarceration is subject to the express condition that Baker shall meet with the Receiver in person, at one or more dates, times and locations to be provided by the Receiver to Baker on 24 hours' notice, for the purpose of answering questions, producing and turning over documents and records, and taking steps to complete Baker's turn over to the Receiver of all Concealed Assets which Baker is obligated to return to the receivership estate under the Contempt Order and the Incarceration Order and otherwise fulfilling Baker's duty of cooperation concerning the Concealed Assets as specified under the Contempt Order and the Incarceration Order.


3. Any failure by Baker to fully and strictly comply with his duties under the Contempt Order and the Incarceration Order, including without limitation his failure to meet with the Receiver and/or to make the disclosures and turnover of Concealed Assets, and information and documents related thereto shall be grounds for immediate re-incarceration of

Baker upon the filing of a declaration of non-compliance by the Receiver or its counsel and entry of an order for re-incarceration.

4. By agreeing to this Stipulation, the Receiver and the FTC do not in any way limit or waive the right to seek and obtain further permissible contempt remedies against Baker.

Dated: May 15, 2007

MCKENNA LONG & ALDRIDGE LLP

By:   
GARY OWEN CARIS  
California Bar No. 088918  
LESLEY ANNE HAWES  
California Bar No. 117101  
444 South Flower Street, 8th Floor  
Los Angeles, California 90071  
Telephone: (213) 688-1000  
Facsimile: (213) 243-6330  
E-Mail: [gcaris@mckennalong.com](mailto:gcaris@mckennalong.com)  
[lhawes@mckennalong.com](mailto:lhawes@mckennalong.com)

Dated: May 15, 2007

MCKENNA LONG & ALDRIDGE LLP

By: \_\_\_\_\_ /s/  
Christina M. Carroll (Bar No. 16863)  
McKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
Telephone: (202) 496-7500  
Facsimile: (202) 496-7756  
E-mail: [ccarroll@mckennalong.com](mailto:ccarroll@mckennalong.com)

Attorneys for Robb Evans & Associates LLC  
as Receiver over the Assets of Andris Pukke  
and DebtWorks, Inc.

Dated: May 15, 2007

FEDERAL TRADE COMMISSION

By: Malini Mithal  
MALINI MITHAL  
600 Pennsylvania Avenue, NW  
Mail Drop NJ 2122  
Washington, D.C. 20580  
Telephone: (202) 326-2972  
E-Mail: [mmithal1@ftc.gov](mailto:mmithal1@ftc.gov)

Dated: May 15, 2007

JONES DAY

By: Geoffrey S. Williams  
JOHN B. WILLIAMS  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001  
Telephone: (202) 879-3939  
Facsimile: (202) 626-1700  
E-Mail: [jwilliams@jonesday.com](mailto:jwilliams@jonesday.com)

Attorneys for PETER BAKER

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 15th day of May 2007, a copy of the STIPULATION FOR CONDITIONAL RELEASE OF PETER BAKER FROM INCARCERATION SUBJECT TO CONTINUED COMPLIANCE WITH COURT ORDERS was served on the parties listed on the attached Service List in the manner indicated.

\_\_\_\_\_  
*/s/*

Christina M. Carroll  
McKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
Telephone: (202) 496-7500  
Fax: (202) 496-7756  
E-mail: ccarroll@mckennalong.com

Attorneys for Robb Evans & Associates  
LLC, Receiver

**SERVICE LIST**

The following CM/ECF participants were served by electronic means on May 15, 2007:

Gary C. Adler - [gadler@oconnorhannan.com](mailto:gadler@oconnorhannan.com); [jmurphy@oconnorhannan.com](mailto:jmurphy@oconnorhannan.com)  
Robert M .Adler - [radler@oconnorhannan.com](mailto:radler@oconnorhannan.com); [jcomisiak@oconnorhannan.com](mailto:jcomisiak@oconnorhannan.com);  
[jtowell@oconnorhannan.com](mailto:jtowell@oconnorhannan.com)  
Allison Ilene Brown - [aibrown@ftc.gov](mailto:aibrown@ftc.gov)  
Jeanne M. Crouse - [jcrouse@ftc.gov](mailto:jcrouse@ftc.gov)  
Ramona Dee Elliott - [relliott@ftc.gov](mailto:relliott@ftc.gov)  
Geoffrey Smith Irwin - [gsirwin@jonesday.com](mailto:gsirwin@jonesday.com)  
Charles Kevin Kobbe - [kevin.kobbe@dlapiper.com](mailto:kevin.kobbe@dlapiper.com)  
William N. Lobel - [wlobel@irell.com](mailto:wlobel@irell.com)  
Glenn A. Mitchell - [gamitchell@steinmitchell.com](mailto:gamitchell@steinmitchell.com); [abeato@steinmitchell.com](mailto:abeato@steinmitchell.com)  
Malini Mithal - [mmithal1@ftc.gov](mailto:mmithal1@ftc.gov)  
Lucy Emily Morris - [lmorris@ftc.gov](mailto:lmorris@ftc.gov)  
Kevyn D. Orr - [korr@jonesday.com](mailto:korr@jonesday.com)  
Jeffrey Mark Reisner - [jreisner@irell.com](mailto:jreisner@irell.com)  
Sanford M. Saunders, Jr. - [saunderss@gtlaw.com](mailto:saunderss@gtlaw.com)  
Roger Schlossberg - [bkcreditor@schlosslaw.com](mailto:bkcreditor@schlosslaw.com); [rschlossberg@schlosslaw.com](mailto:rschlossberg@schlosslaw.com)  
Mark David Taylor - [taylor.mark@arentfox.com](mailto:taylor.mark@arentfox.com)  
John Buchanan Williams - [jbwillians@jonesday.com](mailto:jbwillians@jonesday.com); [aypowell@jonesday.com](mailto:aypowell@jonesday.com)

The following non-CM/ECF participants were served by first-class mail, postage prepaid on May 15, 2007:

John F. Kaley, Esq.  
Doar Rieck Kaley & Mack  
217 Broadway, Suite 707  
New York, NY 10007

Stuart M. Fischbein  
United States Department of Justice  
PO Box 227  
555 Fourth St NW  
Washington, DC 20044





the Receiver in person, at one or more dates, times and locations to be provided by the Receiver to Baker on 24 hours' notice, for the purpose of answering questions, producing and turning over documents and records, and taking steps to complete Baker's turn over to the Receiver of all Concealed Assets which Baker is obligated to return to the receivership estate under the Contempt Order and the Incarceration Order and otherwise fulfilling Baker's duty of cooperation concerning the Concealed Assets as specified under the Contempt Order and the Incarceration Order;

IT IS FURTHER ORDERED that any failure by Baker to fully and strictly comply with his duties under the Contempt Order and the Incarceration Order, including without limitation his failure to meet with the Receiver and/or to make the disclosures and turnover of Concealed Assets, and information and documents related thereto shall be grounds for immediate re-incarceration of Baker upon the filing with the Court of a declaration of non-compliance by the Receiver or its counsel and entry of an order for re-incarceration; and

IT IS FURTHER ORDERED that the Baker Conditional Release Stipulation and this Order shall not in any way limit or waive the Receiver's and the FTC's right to seek and obtain further permissible contempt remedies against Baker.

Dated:

---

ALEXANDER WILLIAMS, JR.  
United States District Judge

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 15th day of May 2007, a copy of the ORDER APPROVING STIPULATION FOR CONDITIONAL RELEASE OF PETER BAKER FROM INCARCERATION SUBJECT TO CONTINUED COMPLIANCE WITH COURT ORDERS AND DIRECTING IMMEDIATE, CONDITIONAL RELEASE FROM CONFINEMENT was served on the parties listed on the attached Service List in the manner indicated.

\_\_\_\_\_/s/  
Christina M. Carroll  
McKENNA LONG & ALDRIDGE LLP  
1900 K Street, N.W.  
Washington, DC 20006  
Telephone: (202) 496-7500  
Fax: (202) 496-7756  
E-mail: ccarroll@mckennalong.com

Attorneys for Robb Evans & Associates  
LLC, Receiver

**SERVICE LIST**

The following CM/ECF participants were served by electronic means on May 15, 2007:

Gary C. Adler - [gadler@oconnorhannan.com](mailto:gadler@oconnorhannan.com); [jmurphy@oconnorhannan.com](mailto:jmurphy@oconnorhannan.com)  
Robert M. Adler - [radler@oconnorhannan.com](mailto:radler@oconnorhannan.com); [jcomisiak@oconnorhannan.com](mailto:jcomisiak@oconnorhannan.com);  
[jtowell@oconnorhannan.com](mailto:jtowell@oconnorhannan.com)  
Allison Ilene Brown - [aibrown@ftc.gov](mailto:aibrown@ftc.gov)  
Jeanne M. Crouse - [jcrouse@ftc.gov](mailto:jcrouse@ftc.gov)  
Ramona Dee Elliott - [relliott@ftc.gov](mailto:relliott@ftc.gov)  
Geoffrey Smith Irwin - [gsirwin@jonesday.com](mailto:gsirwin@jonesday.com)  
Charles Kevin Kobbe - [kevin.kobbe@dlapiper.com](mailto:kevin.kobbe@dlapiper.com)  
William N. Lobel - [wlobel@irell.com](mailto:wlobel@irell.com)  
Glenn A. Mitchell - [gamitchell@steinmitchell.com](mailto:gamitchell@steinmitchell.com); [abeato@steinmitchell.com](mailto:abeato@steinmitchell.com)  
Malini Mithal - [mmithal1@ftc.gov](mailto:mmithal1@ftc.gov)  
Lucy Emily Morris - [lmorris@ftc.gov](mailto:lmorris@ftc.gov)  
Kevyn D. Orr - [korr@jonesday.com](mailto:korr@jonesday.com)  
Jeffrey Mark Reisner - [jreisner@irell.com](mailto:jreisner@irell.com)  
Sanford M. Saunders, Jr. - [saunderss@gtlaw.com](mailto:saunderss@gtlaw.com)  
Roger Schlossberg - [bkcreditor@schlosslaw.com](mailto:bkcreditor@schlosslaw.com); [rschlossberg@schlosslaw.com](mailto:rschlossberg@schlosslaw.com)  
Mark David Taylor - [taylor.mark@arentfox.com](mailto:taylor.mark@arentfox.com)  
John Buchanan Williams - [jbwilliams@jonesday.com](mailto:jbwilliams@jonesday.com); [aypowell@jonesday.com](mailto:aypowell@jonesday.com)

The following non-CM/ECF participants were served by first-class mail, postage prepaid on May 15, 2007:

John F. Kaley, Esq.  
Doar Rieck Kaley & Mack  
217 Broadway, Suite 707  
New York, NY 10007

Stuart M. Fischbein  
United States Department of Justice  
PO Box 227  
555 Fourth St NW  
Washington, DC 20044