

Darren Christian
1211 Hunter Road
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February 10, 2020

The Honorable Peter J. Messitte
United States District Court Judge
United States District Court for the District of Maryland
6500 Cherrywood Lane
Greenbelt, Maryland 20770

Regarding: In Re Sanctuary Belize Litigation 18-cv-3309-PJM

- **DECLARATION OF DARREN CHRISTIAN: Investor in Sanctuary Belize and in Rancho Del Mar, Costa Rica**

Dear Judge Messitte:

Although I wanted to get to the trial to testify, work responsibilities prevented me from being able to get there. Still, I wanted you to have these thoughts. I am presenting the information to the best of my ability.

Thank you for considering the thoughts that follow:

I, Darren Christian, declare:

1. I am not a lawyer and I am submitting this document pro se.
2. I implore this honorable Court to interpret these pleadings liberally because I do not have legal training.
3. I am over the age of 18 years old. If called upon to testify, I could and would testify in accordance with this declaration.
4. I met Andris Pukke, Brandi Greenfield, Rod Kazazi, and Michael Santos when I toured an investment opportunity in Costa Rica, in May of 2018.

5. I state the following:

- a) Back in March of 2017, I purchased an investment property the North Ridge sub-division at The Reserve in Belize for \$400,000.
- b) In April of 2018, I revisited Belize and contemplated purchasing additional properties at The Reserve in Belize.
- c) Michael Santos contacted me and told me that he was going to invest in a new project in Costa Rica by the same developer of The Reserve.

6. I spoke with Michael Santos after he returned from Belize. During those conversations:

- a) Michael Santos told me that Andris Pukke had specified to him that Newport Land Group was a separate, independent, new company that Andris had started with others to develop real estate in other countries outside of Belize.
- b) Michael Santos told me that he intended to personally invest more than \$1 million as a limited partner in the planned Costa Rica, Rancho Del Mar project.
- c) I agreed to join Michael Santos as a limited partner in the Costa Rica real estate investment known as Rancho Del Mar.
- d) I based my investment decision, in part, on Michael Santos's confidence that the Costa Rica project had merit, and that he was personally investing his own money.

7. Shortly after returning from the Costa Rica trip, I received documents from Newport Land Group with instructions on how to become a limited partner in the Rancho Del Mar Costa Rica real estate investment.
8. Newport Land Group told me that all funds from investors in the planned Rancho Del Mar Costa Rica project would be reserved in the Newport Land Group Bank Account ending in 8924 until Newport Land Group purchased the land for the Rancho Del Mar Costa Rica project.
9. I transferred \$600,000 from my personal, independent retirement account to the Newport Land Group bank account at Bank of America ending in 8924.
10. Michael Santos sent me the names and investment amounts of the other Class A investors that were also going to invest with him in the Rancho Del Mar real estate development project in Costa Rica:
 - a) Michael and Carole Santos: \$1,400,000
 - b) David and Lisa Heiman: \$750,000
 - c) Darren Christian: \$600,000
 - d) Julie Santos: \$100,000
 - e) Chan Martin: \$100,000
 - f) Jamie Teng and Juliana Tengonciang: \$100,000
 - g) Quan Lin and Yu Lin: \$200,000
 - h) Jasmin Tengonciang: \$50,000
 - i) Clarissa Tengonciang: \$25,000
 - j) Mary Jane Prijoles: \$25,000

11. I understood that Class A investors contributed a total amount of \$3,340,000 into the Newport Land Group Bank of America account ending in 8924.
12. Michael Santos told me that, like me, David Heiman had invested previously in Andris Pukke's Belize real estate project, and he was also investing in the Costa Rica project because he believed it was a good investment.
13. The Costa Rica real estate project never went through because of the FTC Action against Belize.
14. I wrote a letter to Newport Land Group requesting the return of my investment.
15. I declare under penalty of perjury that the foregoing is true and correct and this declaration was executed on February 10th, 2020.

Summary of my investments:

Back in March of 2017, when I originally visited The Reserve in Belize, I had very little intention of making an investment in purchasing a lot in the development. I was impressed with the design and future plans for the development. I especially enjoyed the fact that the development was extremely conscious of the environment and truly protecting this sanctuary.

There was no pressure by the sales team as I really had no intention of purchasing a lot and I felt very comfortable during the entire trip. I sat back and learned as much as I could about what the plans were for the development and how they plan to achieve its goal.

While the sales team did speak about an airport and hospital being, independently, planned outside the development, it was never spoken that either of these entities were a part of The Reserve. I fully understand that these were plans for Belize and not those of The Reserve.

I was so impressed with the developers plans that I decided to start speaking more seriously to them about possibly purchasing a lot in North Ridge. During our private meetings, I felt no pressure from any of the team members. I invested in The Reserve in Belize because I fully believed this was a great investment opportunity.

Before I left the country, I began to have discussions with a few of the local builders. Once back home in the United States, I had further discussions with architects and a few American builders. I knew that Belize was a fairly underdeveloped country and I knew that things moved a little slower in the country because they simply don't have the resources and building standards that we have here in America.

After speaking to the American builders and architects, I fully understood that the building process would be a little more challenging down in Belize because I would have to have many of my building materials loaded onto a shipping container down in Florida and shipped over to Belize. I wanted my home in Belize to be structurally sound and built to the American standards while using many American materials. Those were my choices and I understood that it would be a longer process to build down in The Reserve in Belize. While I fully understood this, I was very confident in my decision to purchase a lot down in Belize.

After a year had passed, I decided to revisit Belize for two reasons. First, I wanted to see how the development was moving along and secondly, I was interested in possibly purchasing more lots. In early April of 2018, I flew back down to The Reserve. This time, the trip was much different than my first experience. During my initial trip in 2017, we had overnight accommodations and our meals off-site at different locations.

During my second trip in 2018, we had overnight accommodations and our meals on-site at The Reserve. I was very impressed with the progress that had been made over the course of the past year. Of course, everyone would have liked to see things move at a faster pace but I fully understood that we were in a country with limited resources and trades to have things move as fast as they do in the United States.

Both times I visited Belize, I witnessed work being done and earth machines working on the development. The marina was fully functional and things were much further along than my first trip. I was excited and when I got back home, I started entertaining the option of purchasing additional lots in The Reserve.

While I was doing my research about purchasing additional lots in Belize, Michael Santos contacted me stating that there was a new development being considered down in Costa Rica. I understood that this investment would be more on the development side rather than purchasing a lot. I further understood that this could be a tremendous opportunity as I could jump in at the beginning stages of a new development. I also understood that the initial investors in Belize had done quite well with their investments and so I became interested in learning more about Costa Rica.

Michael told me that a trip to Costa Rica was being planned for May of 2018 and I should consider coming down and seeing the potential development site. Again, there was no pressure with the Costa Rica investment, and I went down with the team just to see if there was any real possibilities in this new location. This trip introduced me to Andris Pukke, Brandi Greenfield, Rod Kazazi, and I finally met Michael Santos as we had only spoken over the phone. I became very interested in Costa Rica because it is a much further developed country other than Belize. I loved Belize because it was an underdeveloped country with many opportunities. I loved Costa Rica because of its beauty and opportunities for more rapid growth within the development. I thought it would be better for me to invest my monies in both locations rather than just placing all my monies in Belize.

Costa Rica is totally independent than Belize. The only connection between the two countries is the developer. There are two different companies established for both countries. My Belize investment is totally separate from my Costa Rica investment. I was shocked to learn that the FTC was looping both investments into their case against the developer. I understood that our investment with Costa Rica was held in a separate banking account and that our monies were safe.

It's my hopes and prayers that the courts see these developments as totally independent from one another and that our Costa Rica monies will be returned to us, in full. We, the investors in Costa Rica have no fault, nor complaint in this matter other than our monies should have been protected and returned to us. This has been a very difficult time for us all and we're hoping to move past this and have all our monies

returned to us. Thank you for your time and consideration to clear up this matter so we can all move forward.

A handwritten signature in black ink, appearing to read 'Darren Christian', with a long horizontal line extending to the right from the end of the signature.

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