

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

_____)	
FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	Case No. PJM 03-3317
)	
AMERIDEBT, INC., et al.,)	
)	
Defendants.)	
_____)	

FTC’S APPLICATION FOR IMMEDIATE INCARCERATION

The Federal Trade Commission (“FTC” or “Commission”) requests the immediate incarceration of Andris Pukke and Peter Baker to coerce them to comply with the Court’s Order Holding Andris Pukke and Peter Baker in Contempt of Court (“Contempt Order,” DE # 571, filed March 30, 2007). As explained in the Receiver’s Application for Supplemental Relief and Request for Immediate Incarceration (“Receiver’s Application,” filed April 30, 2007), Mr. Pukke and Mr. Baker have not turned over Mr. Pukke’s assets to the Receiver, in violation of several Court orders entered over the past two years. Even the Court’s recent contempt findings have failed to provide the contemnors with the incentive to comply. According to the Receiver’s estimates, Mr. Pukke and Mr. Baker are withholding at least \$30 million worth of assets from the Receiver, and ultimately from the financially distressed consumers whom Mr. Pukke cheated out of millions of dollars. Clearly, the contemnors need a much stronger incentive to part with that \$30 million. As demonstrated by their continuing contumacious conduct, only immediate incarceration will force them to relinquish these funds.

III. CONCLUSION

For the foregoing reasons, the FTC requests that the Court immediately incarcerate Mr. Pukke and Mr. Baker until they purge their contempt by complying with this Court's Contempt Order.

Dated: April 30, 2007

Respectfully submitted,

FEDERAL TRADE COMMISSION
William Blumenthal
General Counsel

/s/ Malini Mithal
MALINI MITHAL
600 Pennsylvania Ave., NW
Mail Drop NJ-2122
Washington, DC 20580
(202) 326-2972 (telephone)
(202) 326-2558 (facsimile)
mmithal1@ftc.gov

Local Counsel
JEANNE M. CROUSE (#05329)
600 Pennsylvania Ave., N.W.
Mail Stop NJ-2122
Washington, D.C. 20580
(202) 326-3312 (telephone)
(202) 326-2558 (facsimile)
jcrouse@ftc.gov