

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573-CIV-MORENO

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MUTUAL BENEFITS CORP., *et al.*,

Defendants,

VIATICAL BENEFACTORS, LLC, *et al.*,

Relief Defendants.

RECEIVER'S RESPONSE TO ORDER TO SHOW CAUSE [D.E. 2089]

Roberto Martínez, as the court-appointed receiver (“Receiver”) of Mutual Benefits Corp., Viatical Benefactors, LLC, Viatical Services, Inc., and Anthony Livoti, Jr. and Anthony Livoti, Jr., P.A. solely in their capacity as trustee, hereby responds to the Court’s Order to Show Cause [D.E. 2089], entered May 29, 2008. The Order to Show Cause directs the Receiver to, file a response elucidating the manner by which administrative fees have been assessed to investors and documenting the amount of administrative fees collected.

Like the Court, the Receiver, the Receiver’s attorneys, and Viatical Services, Inc. (“VSI”) have all received a number of questions and complaints about the administrative fees that are being charged. The Court’s Order to Show Cause is thus well-taken and well-timed, and the Receiver is taking this opportunity to attempt to set out in detail and in simple terms why VSI needs to collect administrative fees, how it determined what administrative fee to charge, and what those

administrative fees are being used for. The Receiver has set forth his response to all of the above in the attached Report. This Report will also be posted on the Receiver's website and will be forwarded to investors in the future who have questions or complaints about the administrative fees.

Respectfully submitted,

COLSON HICKS EIDSON
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By: s/ Curtis B. Miner
Curtis B. Miner
FL Bar No. 0885681

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was served via CM/ECF on all parties of record on June 18, 2008, and by U.S. Mail to:

Ronald Meyers
505 Kinzie Island Court
Sanibel, Florida 33957

s/ Curtis B. Miner
Curtis B. Miner