

Mar 24 2005

CLARENCE MADDOX
CLERK U.S. DIST. CT.
S.D. OF FLA. MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 04-60573 CIV-MORENO/GARBER

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MUTUAL BENEFITS CORP.,
JOEL STEINGER a/k/a JOEL STEINER,
LESLIE STEINGER a/k/a LESLIE STEINER
and PETER LOMBARDI,

Defendants,

VIATICAL BENEFACTORS, LLC,
VIATICAL SERVICES, INC.,
KENSINGTON MANAGEMENT, INC.
RAINY CONSULTING CORP.,
TWIN GROVES INVESTMENTS, INC.,
P.J.L. CONSULTING, INC.,
SKS CONSULTING, INC., and
CAMDEN CONSULTING, INC.

Relief Defendants.

**INTEGRITY PLUS SERVICE'S THIRD INTERIM REQUEST
FOR COMPENSATION FOR INVESTIGATIVE AND SECURITY
SERVICES PROVIDED TO THE RECEIVER
AND MEMORANDUM IN SUPPORT
(October 1, 2004 – February 4, 2005)**

**Pursuant to Court Order, all objections to this Application
must be filed and served within ten (10) days of the date of this
Application.**

Carlis Sabinson, President of Integrity Plus Services (“Integrity Plus ”), moves this Court to award interim fees and costs incurred by Integrity Plus for security and investigative services provided to the Receiver, Roberto Martínez (the “Receiver”), in support of this application, the undersigned submits the following:

1. Attached as **Exhibit 1** is a summary of Integrity Plus’ fees and expenses.¹ **Exhibit 2** is a summary of all invoices submitted by Integrity Plus by invoice number indicating the regular fee which would have been charged, the discount, the discounted fee, costs and the invoice amount. **Exhibit 3** is a summary of all Integrity Plus’ investigators, their billing rates, total hours that were charged by each and the expenses incurred through February 4, 2005 (the “Application Period”).²

¹ There are a few entries pre October 1, 2004 that were inadvertently omitted from Integrity’s Second Interim Petition for Fees and Costs.

²Integrity Plus maintains detailed time records that are kept contemporaneously with the services performed. Integrity will file, within 10 days, these detailed time records under seal with the Court for review *in camera* and ex-parte.

Integrity Plus has agreed to discount its normal and customary rates for the services provided to the Receiver, which has amounted to a discount in its fees of **\$27,062.50**.

2. Integrity Plus is a licensed private investigation agency staffed mostly by retired United States federal agents with extensive experience in providing an array of security and investigative services, including experience in Receivership matters.

3. The Receiver retained Integrity Plus to provide investigative and security services including coordinating and maintaining security for MBC's and VSI's facilities, providing investigative services, monitoring of personnel at MBC and VSI, conducting periodic checks of the VSI records room, and securing the mail for management review. Integrity Plus' main goal to date has been to insure the integrity of the MBC and VSI facilities including security and control of the books, records, documents and Receivership assets contained at those facilities. The following is a summary of the services that Integrity Plus has provided to date for which it seeks compensation:

a. Activities Since the Initial Transfer of Control to the Receiver: Integrity Plus has provided general security services at MBC and VSI, as well as the following services since the initial transfer of control to the Receiver:

- Monitored the activities of MBC and VSI employees remaining at the premises to protect the Receivership assets, by maintaining document control, including escorting employees to the various floors at both the MBC and VSI locations; and retrieving and distributing the mail.

- Provided investigative services to the Receiver, including conducting investigations to locate missing Viators. This has resulted in locating the whereabouts of viators corresponding to approximately \$150,000 in face value of insurance policies.

3298.101/241741.1

4. For the Application Period, Integrity Plus seeks reimbursement of **\$55,557.73**, which includes fees in the amount of **\$54,125.00** and expenses in the amount of **\$1,432.73**.

5. I have carefully reviewed the attached exhibits and I am responsible for supervising all Integrity Plus personnel on the case. I certify that the hours expended and the costs incurred were necessary and reasonable to provide services to the Receiver during the Application Period.

MEMORANDUM OF LAW

This Court entered an Order authorizing the Receiver to retain Integrity Plus to provide security and investigative services to the Receiver. *See* Order Approving Receiver's Notice of Intention to Retain Integrity Plus Service to Perform Investigative Services for the Receiver dated June 3, 2004. This Court has the power to award the Receiver fees for his services and for expenses incurred by the Receiver in performance of his duties. *See Donovan v. Robbins*, 588 F.Supp. 1268, 1272 (N.D. Ill. 1984). The Receiver has reviewed Integrity Plus' security and investigative fees and expenses in furtherance of his duties. Integrity Plus has provided services to the Receiver by protecting and securing the integrity of MBC's and VSI's facilities, assets, books, records and documents, and stabilizing MBC's operations. Integrity Plus respectfully submits that it is entitled to compensation for its services.

WHEREFORE, Integrity Plus Services, by and through the undersigned, respectfully requests that this Court enter an Order Authorizing the Payment of \$54,125.00 in fees and reimbursement of \$1,432.73 in costs (total of \$55,557.73) for this Application Period. A proposed Order is attached.

Dated: March 24, 2005.

Respectfully submitted,

Integrity Plus Services
P.O. Box 970334
Coconut Creek, Florida 33097

By: 
Carlis Sabinson

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on March 24, 2005, the foregoing was electronically filed with the Clerk of the Court, and a notice of electronic filing was sent to:

Laurel M. Isicoff, Esquire
Kozyak Tropin & Throckmorton
lmi@kttlaw.com

Linda Schmidt, Esquire
Alise Meredith Johnson, Esquire
Securities & Exchange Commission
schmidtls@sec.gov; johnsona@sec.gov

Faith E. Gay, Esquire
White & Case LLP
fgay@whitecase.com


George Mahfood, Esquire
Ferrell Schultz
gmanhfood@ferrellschultz.com

and by U.S. Mail to:

Bruce A. Zimet Esq.
Bruce A. Zimet, P. A.
100 S.E.3rd Avenue, Suite 2612
Ft. Lauderdale, FL 33394
Attorneys for Leslie Steinger

Richard Ben-Veniste, Esq.
Lee Rubin, Esq.
Mayer Brown Rowe & Maw
1909 K. Street, N.W.
Washington, DC 20006
*Attorneys for Joel Steinger & Relief Def.
Kensington*

Jon A. Sale, Esq.
Ben Kuehne, Esq.
Sale & Kuehne, P.A.
BankAmerica Tower, Suite 3550
100 S.E. 2nd Street
Miami, FL 33131-2154
*Attorneys for Peter Lombardi & Relief Def. P/JL
Consulting*

By: 
CURTIS B. MINER
Fla. Bar No. 0885681
Attorney for Receiver

CURTIS B. MINER
COLSON HICKS EIDSON
255 Aragon Avenue, Second Floor
Coral Gables, Florida 33134
Telephone: (305) 476-7400
Facsimile: (305) 476-7444
E-Mail: curt@colson.com

PROPOSED ORDER

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573 CIV-MORENO
Magistrate Judge Garber

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MUTUAL BENEFITS CORP.,
JOEL STEINGER a/k/a JOEL STEINER,
LESLIE STEINGER a/k/a LESLIE STEINER,
and PETER LOMBARDI,

Defendants,

VIATICAL BENEFACTORS, LLC,
VIATICAL SERVICES, INC.,
KENSINGTON MANAGEMENT, INC.,
RAINY CONSULTING CORP.
TWIN GROVES INVESTMENTS, INC.,
P.J.L. CONSULTING, INC.,
SKS CONSULTING, INC., and
CAMDEN CONSULTING, INC.,

Relief Defendants.

**ORDER GRANTING
INTEGRITY PLUS SERVICE'S
THIRD INTERIM PETITION FOR FEES AND COSTS**

THIS CAUSE came before the Court on Integrity Plus Service's Third Interim Petition for Fees and Costs. The Court has heard comments by interested parties, carefully reviewed the Petition and case file and is otherwise fully advised in the premises.

THE COURT notes that by prior Order this Court authorized the Receiver to “appoint one or more special agents, employ legal counsel, actuaries, accountants, claims administrators, clerks, consultants and assistants as the Receiver deems necessary and to fix and pay their reasonable compensation and expenses” subject to the approval by this Court at the time the Receiver accounts to the Court for such expenditures and compensation.

Pursuant to that provision, by prior Order the Court approved Receiver’s application to employ Integrity Plus Service’s (“Integrity Plus”) to provide investigative and security services to the Receiver in this action. In the instant Petition, Integrity Plus seeks to have the Court authorize the Receiver to compensate Integrity Plus for services rendered for the period from October 1, 2004 through February 4, 2005. In total, the Petition seeks approval of the payment of **\$55,557.73** consisting of \$54,125.00 in fees and \$1,432.73 in costs.

Accordingly, after due consideration, it is

ORDERED and **ADJUDGED** that Integrity Plus Service’s Third Interim Petition for Fees and Costs is hereby **GRANTED** and Receiver, Roberto Martínez is hereby authorized to pay to Integrity Plus Services the sum of \$ _____ which represents reasonable fees and costs incurred during this Application Period.

DONE and **ORDERED** in Chambers in the Southern District this ____ day of _____, 2005, in Miami, Florida.

FEDERICO A. MORENO
United States District Judge

Copies furnished to all counsel
on the attached Service List.

SERVICE LIST OF RECEIVER

March 17, 2005

Case No.: 04-60573 CIV-Moreno

Roberto Martínez, Receiver
Colson Hicks Eidson
255 Aragon Avenue
Second Floor
Coral Gables, FL 33134
Tel: (305) 476-7400
Fax: (305) 476-7444

Curtis B. Miner, Esquire
Colson Hicks Eidson
255 Aragon Avenue
Second Floor
Coral Gables, FL 33134
curt@colson.com
Attorney for Receiver

Laurel M. Isicoff, Esq.
KOZYAK TROPIN & THROCKMORTON
2525 Ponce de Leon Blvd.
9th Floor
Coral Gables, Florida
Tel: (305) 372-1800
Fax: (305) 372-3508
lmi@kttl.com
Attorneys for Receiver

Faith E. Gay, Esq.
White & Case LLP
4900 Wachovia Financial Center
200 So. Biscayne Blvd.
Miami, FL 33131-2352
Tel: (305) 371-2700
Fax: (305) 358-5744
fgay@whitecase.com
Attorneys for Camden Consulting, Inc.

Jon A. Sale, Esq.
Ben Kuehne, Esq.
Sale & Kuehne, P.A.
BankAmerica Tower, Suite 3550
100 S.E. 2nd Street
Miami, FL 33131-2154
Tel: (305) 789-5989
Fax: (305) 789-5987
Attorneys for Peter Lombardi & Relief Def. P.J.L Consulting

Linda Schmidt, Esq.
Alise Meredith Johnson, Esq.
SECURITIES & EXCHANGE COMMISSION
801 Brickell Avenue
Suite 1800
Miami, FL 33131
Tel: (305) 982-6322
Fax: (305) 536-4154
schmidtls@sec.gov
johnsona@sec.gov
Attorneys for Securities & Exchange Commission

Richard Ben-Veniste, Esq.
Lee Rubin, Esq.
Mayer Brown Rowe & Maw
1909 K. Street, N.W.
Washington, DC 20006
Tel: (202) 263-3000
Fax: (202) 263-5333
Attorneys for Joel Steinger & Relief Def. Kensington

George Mahfood, Esquire
Ferrell Schultz
201 South Biscayne Boulevard
Miami, Florida 33131
Tel: (305) 371-8585
Fax: (305) 371-5732
gmahfood@ferrellschultz.com
Attorneys for Joel Steinger, Leslie Steinger, Peter Lombardi and P.J.L Consulting

Bruce A. Zimet Esq.
BRUCE A. ZIMET, PA
100 S.E.3rd Avenue, Suite 2612
Ft. Lauderdale, FL 33394
Attorneys for Leslie Steinger
Tel: (954) 764-7081
Fax: (954) 760-4421

EXHIBIT 1

**SUMMARY OF THIRD INTERIM APPLICATION
FOR COMPENSATION OF FEES AND COSTS OF
INTEGRITY PLUS SERVICE**

1	Name of Applicant	Integrity Plus Service
2	Role of Applicant	Investigative Services for the Receiver
3	Name of certifying professional	Carlis R. Sabinson
4	Date Receiver appointed	May 4, 2004
5	Date of application for employment	June 1, 2004
6	Date of Order approving employment	June 3, 2004
7	Dates of services rendered	October 1, 2004 through February 4, 2005
8	Total fees requested for this period	\$54,125.00
9	Total expenses requested for this period	\$ 1,432.73
10	Total fees and expenses requested to be awarded	\$55,557.73

HISTORY OF FEE APPLICATIONS

Application Number	Application Period	Date Submitted	Amount Requested	Amount Awarded	Date Awarded
1	5/4/04 – 6/18/04	7/15/04	\$190,689.47	\$190,689.00	10/25/04
2	6/19/04 – 9/30/04	12/27/04	\$82,533.27		
3	10/1/04 – 2/4/05	3/24/05	\$55,557.73		
TOTAL			\$328,780.47	\$190,689.00	

EXHIBIT 2

SUMMARY OF INTEGRITY'S FEES EXPENSES

Inv. No.	Dates of Service	Total Hours	Fees (Regular)	Discount	Discounted Fees	Costs	Invoice Amount
00 04 274 a	10/4/04 - 10/8/04	33.50	\$5,025.00	\$1,675.00	\$3,350.00	\$65.60	\$3,415.60
00 04 277	10/11/04 - 10/15/04	27.00	\$4,050.00	\$1,350.00	\$2,700.00	\$24.00	\$2,724.00
00 04 278	10/18/04 - 10/22/04	21.00	\$3,150.00	\$1,050.00	\$2,100.00	\$72.00	\$2,172.00
00 04 285 b	10/25/04 - 10/29/04	29.50	\$4,425.00	\$1,475.00	\$2,950.00	\$89.74	\$3,039.74
00 04 289	11/1/04 - 11/5/04	31.00	\$4,650.00	\$1,550.00	\$3,100.00	\$48.00	\$3,148.00
00 04 290	11/8/04 - 11/12/04	26.00	\$3,900.00	\$1,300.00	\$2,600.00	\$72.00	\$2,672.00
00 04 292	11/15/04 - 11/19/04	29.50	\$4,425.00	\$1,475.00	\$2,950.00	\$72.00	\$3,022.00
00 04 300	11/22/04 - 11/26/04	27.00	\$4,050.00	\$1,350.00	\$2,700.00	\$52.00	\$2,752.00
00 04 307 c	11/28/04 - 12/3/04	38.00	\$5,700.00	\$1,900.00	\$3,800.00	\$131.17	\$3,931.17
00 04 308	12/6/04 - 12/10/04	24.00	\$3,600.00	\$1,200.00	\$2,400.00	\$60.00	\$2,460.00
00 04 315	12/13/04 - 12/17/04	26.50	\$3,975.00	\$1,325.00	\$2,650.00	\$100.00	\$2,750.00
00 04 317	12/20/04 - 12/24/04	30.00	\$4,500.00	\$1,500.00	\$3,000.00	\$65.00	\$3,065.00
00 04 318 d	12/27/04 - 12/29/04	28.50	\$4,275.00	\$1,425.00	\$2,850.00	\$117.00	\$2,967.00
00 05 151	1/3/05 - 1/7/05	30.25	\$4,537.50	\$1,512.50	\$3,025.00	\$75.00	\$3,100.00
00 05 153	1/10/05 - 1/14/05	32.00	\$4,800.00	\$1,600.00	\$3,200.00	\$90.00	\$3,290.00
00 05 156	1/17/05 - 1/21/05	25.00	\$3,750.00	\$1,250.00	\$2,500.00	\$75.00	\$2,575.00
00 05 159 e	1/24/05 - 1/28/05	37.75	\$5,662.50	\$1,887.50	\$3,775.00	\$134.22	\$3,909.22
00 05 164	1/31/05 - 2/4/05	44.75	\$6,712.50	\$2,237.50	\$4,475.00	\$90.00	\$4,565.00
	TOTALS:		<u>\$81,187.50</u>	<u>\$27,062.50</u>	<u>\$54,125.00</u>	<u>\$1,432.73</u>	<u>\$55,557.73</u>
a - includes 9/13/04 - 10/4/04 at Investigative Solutions							
b - includes 10/11/04 - 10/25/04 at Investigative Solutions							
c - includes 11/1/04 - 11/30/04 at Investigative Solutions							
d - includes 12/6/04 - 12/28/04 at Investigative Solutions							
e - includes 1/5/05 at Investigative Solutions							

EXHIBIT 3

SUMMARY OF PROFESSIONAL INVESTIGATOR'S
TIME BY INDIVIDUAL

Name	Total Hours	Discounted Rate	Total Fees	Expenses	Total Fees and Expenses
[For the period of 10/1/04 - 2/4/05]					
Civitano, Dominic	103.25	\$100.00	\$10,325.00	\$311.60	\$10,636.60
Investigative Solutions	33.25	\$100.00	\$3,325.00	\$213.93	\$3,538.93
Parkerson, Kenneth	28.50	\$100.00	\$2,850.00	\$112.00	\$2,962.00
Praeger, Keith	6.00	\$100.00	\$600.00	\$0.00	\$600.00
Sabinson, Chic	370.25	\$100.00	\$37,025.00	\$795.20	\$37,820.20
Total Hours:	541.25	\$100.00	\$54,125.00	\$1,432.73	\$55,557.73
TOTAL FEES AND EXPENSES					\$55,557.73