

Mar 8 2006

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-60573-CIV-MORENO/SIMONTON

SECURITIES AND EXCHANGE  
COMMISSION,  
Plaintiff,  
v.

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

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.

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**TWELFTH REPORT OF THE RECEIVER**

Roberto Martínez, court-appointed receiver (the "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 (collectively the "Receivership Entities"), submits this Twelfth Report of the Receiver.

**Colson Hicks Eidson**

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## **INTRODUCTION**

This Report is filed primarily to inform the Court of the status of the disposition process to date. This Report also summarizes some of the steps taken to inform investors about this process and sets forth some of the preparation undertaken for future phases of the disposition process.

## **INITIAL MAILING OF NOTICES AND PREFERENCE FORMS**

Since January 13, 2006, the Receiver has mailed 52,324 Notices and Preference Forms to 30,386 investors inviting their vote on the disposition of their investment interest. Each investor has been provided an option as to whether each investment should be sold, kept, or surrendered. Each Notice and Preference Form is specific to the investor receiving it and describes with detail the specific investment unit. Pursuant to the Court's Order, as to each policy, the majority of investors who vote (as measured by the investment amount) will determine what happens to the policy. The initial Notice and Preference Form required a vote to be received by the Garden City Group by March 1, 2006.

## **PREFERENCE TALLIES TO DATE**

As of March 6, 2006, votes have been cast representing more than 50% of the ownership on 3,056 policies corresponding to \$553,861,124.07 in total face value. The results of the voting will be reported after the extended April 14 deadline (discussed below) has passed. These numbers were calculated by the Claims Administrator, the Garden City Group, Inc., based upon their electronic and manual evaluation of each Preference Form that was returned.

To verify the Claims Administrator's tallies, the Receiver's professionals have obtained and counted votes and manually added the percentages for 22 policies randomly selected for verification. For each hand counted policy, the Garden City Group, Inc.'s system's results matched the manual vote tally.

### **SECOND MAILING OF NOTICES AND PREFERENCE FORMS**

For investment units in policies which did not have 50% plus voting, on Wednesday, March 8, 2006, a second mailing of Notices and Preference Forms was sent to all investors who had not previously cast a vote. This procedure was previously authorized by the Court. In an effort to minimize the cost of the second mailing, no investor was sent a second mailing if his or her policy had a determination already based on a 50% plus vote, or if that investor had previously voted. A total of 13,224 Notices and Preference Forms were sent in the second mailing. **The final deadline for receipt of executed Preference Forms is April 14, 2006.**

### **INVESTOR RESPONSE TO NOTICE AND PREFERENCE FORMS**

The number of investors who have not returned Preference Forms far exceeds the number of undeliverable Notices and Preference Forms. Many investors, despite the efforts described above, cannot be located or have chosen not to respond to the Notice and Preference Form mailing. The Receiver and his professionals have taken internal and external actions to try to locate these people, including the second mailing, the OCASA hand-delivery in parts of Latin America, the National Change of Address (NCOA) searches, and forthcoming media efforts. The Receiver's website, [www.mbcreceiver.com](http://www.mbcreceiver.com), posts notices and Frequently Asked Questions encouraging investors who have not received their

Notice and Preference Form to contact us immediately.

The Claims Administrator, which is very experienced in this type of investor relations effort, has stated that the level of investor participation exceeds their expectations for a process of this nature.

### **UNDELIVERED NOTICES AND PREFERENCE FORMS**

After consultation with the Garden City Group, the Claims Administrator hired in this matter, counsel decided to take additional steps to provide information to investors in specific Latin American countries known to the Claims Administrator to have very low delivery rates through regular mail or a high prevalence of mail fraud. The Claims Administrator recommended OCASA Logistics Solutions as the most competitive vendor with a good track record. That company became responsible for the hand delivery of all Notices for Argentina, Chile, Colombia, Ecuador, Guatemala, Uruguay and Venezuela. Three attempts were made before a Notice and Preference Form was deemed undeliverable.

As of March 3, 2006, the undelivered Notices and Preference Forms total as follows:

<b><u>Country</u></b>	<b><u>Undeliverable Notices</u></b>	<b><u>Unique Investors</u></b>
Argentina	15	8
Austria	6	4
Belgium	2	1
Bermuda	17	8
Canada	55	36
Chile	84	68
China (People's Rep)	7	5
Colombia	467	381
Dominican Republic	2	2

Germany	2	2
Great Britain	9	7
Greece	1	1
Hong Kong, China	16	15
Indonesia	1	1
Ireland	1	1
Italy	2	2
Japan	2	2
Luxembourg	1	1
Netherlands	4	3
Puerto Rico	33	23
Romania	1	1
Spain	1	1
Taiwan	23	22
United States	2956	1802
Venezuela	263	181
U.S. Virgin Islands	1	1
West Indies	1	1

In the United States, the Notices and Preference Forms were mailed to the most current addresses in the Mutual Benefits database. The Receiver authorized the Garden City Group to perform a NCOA database search for the undeliverable Notices and Preference Forms in the United States. As a result of that search, the Garden City Group was able to locate addresses for 713 corresponding investors. An additional 153 investors, who also never received Notices and Preference Forms, recently provided a Change Address Form to the Garden City Group. Therefore, in the second mailing, 866 from the total of 1,802 investors (corresponding to the undeliverable Notices and Preference Forms) should receive Notices and Preference Forms unless the disposition of their policies had already been determined by the majority of the investors voting on those policies.

The Receivership is making additional efforts to communicate through mass media with the investors located in the following countries: United States, Chile, Colombia, and Venezuela.

**RECEIVER'S WEBSITE AND OTHER  
COMMUNICATIONS WITH INVESTORS**

The Receiver is continually updating the website to provide to investors as much information as possible about the disposition process. The web-site's section on "Frequently Asked Questions" has been consistently updated to reflect the principal questions asked by investors throughout this process.

Mutual Benefits Corporation, through its employees and the Receiver's professionals, has spoken by telephone with in excess of 800 investors. Additionally, Mutual Benefits Corporation employees have answered, on average, approximately 100 individual e-mails every day. Furthermore, counsel to the Receiver regularly return telephone calls to investors to respond to special circumstances requiring the intervention of counsel.

The Receiver is sensitive to the frustration felt by some investors who call or write to complain about their perceived inadequacy with the information available. The receivership has endeavored to be as responsive as possible under the circumstances. Many of the questions asked by investors are repeated regularly. The most frequently asked questions, and their answers, which have been previously provided to investors, are included as follows:

Question: Why can't I get current medical records for the insured? Will there be medical updates in the future?

Answers: The Receiver does not have current medical records and has no plans to obtain updated medical records. Based on past history, the cost of obtaining medical records is approximately \$300 per insured each time records are requested, not including the cost

of labor spent on this effort. With over 7,000 insureds, the costs of obtaining such medical records would be in excess of \$2,000,000. This is an amount that the Receivership cannot afford. In addition, the medical records are confidential health information for the insureds that is protected by federal privacy statutes and regulations. Moreover, most of the insureds are not required to provide medical records and, based on past experience, are generally reluctant to do so. Based on past experience, despite whatever effort and monies are expended, Mutual Benefits Corporation is unlikely to receive updated medicals for 60% or more of the insureds.

Question: Why doesn't the Receiver continue to pay premiums until maturity for all policies kept by the investors?

Answer: It is unknown when the maturities would occur. There is simply not enough money in the Receivership to do so.

Question: Can we get an extension to vote?

Answer: The deadline for receipt of the Preference Forms has been extended to April 14, 2006, in order to accommodate those investors who did not receive Notices and Preference Forms in the first voting period.

Question: How much cash value is in the policy?

Answer: There is no final answer to this question. In many policies the cash value, if any, has been used to pay for premiums, so the number is constantly fluctuating.

Question: Why are the VSI fees so high?

Answer: It is very labor and time intensive to service policies and provide appropriate customer service. These services merit the fees charged. The fees charged by VSI are comparable to other companies in the industry.

Question: Please give me the names, addresses and telephone numbers of other investors on my policy so I can discuss my vote with them.

Answer: We can not provide the names and personal information of investors. It is our objective to protect the identity of all

investors in this matter, including those making the request.

Question: How long will I be obligated to pay the premiums if we vote to keep the policy?

Answer: Your obligation to pay the premiums and costs of administering the policy will continue until the policy matures, and the policy may not mature for many years.

Question: Please give me the contact information, name and address for the insured so that I can contact him or her to check his or her expected life span and request his or her medical records.

Answer: Under the federal law known as HIPPA and in an effort to protect the privacy of the viators, we can not release contact information about viators to investors.

Question: Is the status of each insured being followed?

Answer: VSI continuously seeks to monitor the status of all insureds. Investors will be notified upon the submission of claims for death benefits.

Question: How long will a delayed premium obligation be in effect?

Answer: There is no guarantee as to how long a delayed premium obligation will pay, or reduce the cost of, premium payments. It is estimated that the delayed premium obligation will end on either the later of MBC's projected life expectancy date for the insured or the date any cash value in the policy is used up. That estimated premium start date is provided on your Policy Detail Sheet. If your policy is on premium waiver, you should refer to the footnote on your Policy Details Sheet.

Question: What can I expect to receive if my policy is sold?

Answer: The Receiver can not answer this question with any degree of certainty. Recently, AIDS policies have been sold between 4% and 11% of face value and life settlement policies have been sold for between 10% and 33%. There is no guarantee these prices can be achieved if your policy is sold.



These questions are not exhaustive, but are a sampling of several of the questions that are repeatedly asked of the people taking the calls from investors.

### **THE FUTURE OF THE DISPOSITION PROCESS**

The Receiver's professionals are working to establish a plan for the sale of those policies for which the investors have voted and a determination has been made to sell those policies. Various options are being considered at this time and will be addressed with the Court as soon as complete information is available.

### **POLICIES TO BE KEPT BY INVESTORS**

Viatical Services, Inc. has worked extensively with independent professionals to establish a billing process to comply with the Court's further orders in relation to the policies being kept by investors. In doing so, Viatical Services, Inc. has established forms for billing and a tentative billing schedule. In compliance with the Court's Order and the Notice sent to all investors, the bills indicate that the failure to pay will cause the forfeiture of the policies. The investors will be billed separately for premiums due and for the VSI fees documented on the Notice. Failure to pay those fees as well will cause the forfeiture of the policy.


Because of the large number of undeliverable Notices and Preference Forms referenced above, we believe that there are investors who, despite the Receiver's extensive efforts, will not receive their bills. Those investors may inadvertently forfeit their interests by failing to respond to documents which they may not have received.

The Receiver's professionals are developing a plan to enable investors on these policies who indicated a willingness to buy additional portions to have the opportunity to buy those portions of the policies held by investors who voted to sell. The Notice requires this

opportunity be given to those particular investors. There have also been expressions of interest by third parties to participate in this process, and the Receiver is considering that option as well. Because of the rapidly upcoming premium payment obligations, the time frame on this internal sale process will be extremely tight. The Garden City Group will likely be requested handle this limited procedure.

DATED: March 8, 2006.

Respectfully submitted,

  
ROBERTO MARTINEZ  
RECEIVER

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail to the parties on the attached Receiver's Service List on March 8, 2006.

  
Curtis B. Miner

## SERVICE LIST OF RECEIVER

Case No.: 04-60573 CIV-Moreno

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