

CASE NO.

CIV-MORENO

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MAGISTRATE JUDGE

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.

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

**EX PARTE MOTION FOR TEMPORARY RESTRAINING ORDER AND
OTHER RELIEF AND ENTRY OF PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Securities and Exchange Commission ("Commission") moves this Court ex parte for the following emergency relief to prevent Defendants Mutual Benefits Corp. ("MBC"), Joel Steinger a/k/a Joel Steiner, Leslie Steinger a/k/a Leslie Steiner, and Peter Lombardi (collectively "Defendants") from continuing to defraud investors by fraudulently offering unregistered securities issued by MBC in the form of investment interests in viatical settlement contracts:

- 1) an Order to Show Cause Why a Preliminary Injunction Should Not be Granted;

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- 2) a Temporary Restraining Order;
- 3) an Order Freezing Defendants' Assets;
- 4) an Order Requiring Accountings;
- 5) an Order Prohibiting Destruction of Documents; and
- 6) an Order Expediting Discovery.

The Commission also moves for the following orders with respect to Relief 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. (collectively "Relief Defendants"):

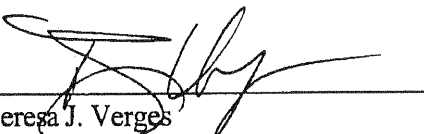
- 1) an Order Freezing Relief Defendants' Assets;
- 2) an Order Requiring an Accounting; and
- 3) an Order Expediting Discovery.

The grounds for this Motion are fully set forth in the accompanying Memorandum of Law. A proposed Order is also attached.

Respectfully submitted,

May 3, 2004

By:


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