

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

**INTEGRITY PLUS SERVICE'S FOURTH INTERIM REQUEST
FOR COMPENSATION FOR INVESTIGATIVE AND SECURITY
SERVICES PROVIDED TO THE RECEIVER
AND MEMORANDUM IN SUPPORT
(February 7, 2005 – May 31, 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.**

Colson Hicks Eidson

255 Aragon Avenue, 2nd Floor, Coral Gables, Florida 33134-5008 Telephone: (305) 476-7400 Fax: (305) 476-7444

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. **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 May 31, 2005 (the “Application Period”).¹ 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 **\$14,037.50**.

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

¹ Integrity 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.

Receivership assets contained at those facilities. The following is a summary of the services that Integrity Plus has provided to date for which its 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, and has located them in Africa, Costa Rica, Hawaii and other parts of the world. This has resulted in locating the whereabouts of viators corresponding to approximately \$838,776 in face value of insurance policies.

4. For the Application Period, Integrity Plus seeks reimbursement of **\$29,055.88**, which includes fees in the amount of **\$28,075.00** and expenses in the amount of **\$980.88**.

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 \$28,075.00 in fees and reimbursement of \$980.88 in costs (total of \$29,055.88) for this Application Period. A proposed Order is attached.

Dated: March 18, 2005.

Respectfully submitted;

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

By: 

Carlis Sabinson

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of this Motion to File Ex-Parte and Under Seal was forwarded by undersigned counsel for the Receiver, via electronic mail to all parties on the attached Service List this ^{19th} day of August, 2005.

By: 
Curtis Miner

SERVICE LIST OF RECEIVER

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EXHIBIT 1

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	February 7, 2005 – May 31, 2005
8	Total fees requested for this period	\$28,075.00
9	Total expenses requested for this period	\$ 980.88
10	Total fees and expenses requested to be awarded	\$29,055.88

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	\$82,533.27	6/1/05
3	10/1/04 – 2/4/05	3/24/05	\$55,557.73	\$55,557.73	6/1/05
4	2/7/05 – 5/31/05		\$29,055.88		
TOTAL			\$357,836.35		

EXHIBIT 2

EXHIBIT 2

SUMMARY OF INTEGRITY'S FEES EXPENSES

<u>Inv. No.</u>	<u>Dates of Service</u>	<u>Total Hours</u>	<u>Fees (Regular)</u>	<u>Discount</u>	<u>Discounted Fees</u>	<u>Costs</u>	<u>Invoice Amount</u>
00 05 168	2/7/05 - 2/11/05	40.25	\$6,037.50	\$2,012.50	\$4,025.00	\$90.00	\$4,115.00
00 05 171	2/14/05 - 2/18/05	28.75	\$4,312.50	\$1,437.50	\$2,875.00	\$84.50	\$2,959.50
00 05 173	2/22/05 - 2/25/05	19.50	\$2,925.00	\$975.00	\$1,950.00	\$75.00	\$2,025.00
00 05 179	2/27/05 - 3/4/05	14.50	\$2,175.00	\$725.00	\$1,450.00	\$80.25	\$1,530.25
00 05 182	3/7/05 - 3/10/05	12.25	\$1,837.50	\$612.50	\$1,225.00	\$30.00	\$1,255.00
00 05 189	3/14/05 - 3/18/05	15.50	\$2,325.00	\$775.00	\$1,550.00	\$60.00	\$1,610.00
00 05 193	3/21/05 - 3/25/05	14.50	\$2,175.00	\$725.00	\$1,450.00	\$45.00	\$1,495.00
00 05 195	3/28/05 - 4/1/05	12.00	\$1,800.00	\$600.00	\$1,200.00	\$45.00	\$1,245.00
00 05 198 (a)	4/4/05 - 4/8/05	23.75	\$3,562.50	\$1,187.50	\$2,375.00	\$114.13	\$2,489.13
00 05 199	4/11/05 - 4/15/05	12.75	\$1,912.50	\$637.50	\$1,275.00	\$30.00	\$1,305.00
00 05 201	4/18/05 - 4/22/05	15.75	\$2,362.50	\$787.50	\$1,575.00	\$60.00	\$1,635.00
00 05 203	4/25/05 - 4/29/05	12.00	\$1,800.00	\$600.00	\$1,200.00	\$72.00	\$1,272.00
00 05 214	5/2/05 - 5/6/05	16.00	\$2,400.00	\$800.00	\$1,600.00	\$75.00	\$1,675.00
00 05 217	5/9/05 - 5/13/05	19.25	\$2,887.50	\$962.50	\$1,925.00	\$45.00	\$1,970.00
00 05 220	5/16/05 - 5/21/05	12.00	\$1,800.00	\$600.00	\$1,200.00	\$30.00	\$1,230.00
00 05 223	5/23/05 - 5/27/05	12.00	\$1,800.00	\$600.00	\$1,200.00	\$45.00	\$1,245.00
	TOTALS:		<u>\$42,112.50</u>	<u>\$14,037.50</u>	<u>\$28,075.00</u>	<u>\$980.88</u>	<u>\$29,055.88</u>

(a) includes 2/5/05 - 4/1/05 at Investigative Solutions, Atlanta, Georgia

EXHIBIT 3

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 2/7/05 – 5/31/05]					
Civitano, Dominic	43.25	\$100.00	\$4,325.00	\$129.50	\$4,454.50
Investigative Solutions	17.00	\$100.00	\$1,700.00	\$119.38	\$1,819.38
Sabinson, Chic	220.50	\$100.00	\$22,050.00	\$735.00	\$22,785.00
Total Hours:	280.75				
Sub-totals:			\$28,075.00	\$983.88	
TOTAL FEES AND EXPENSES					<u>\$29,058.88</u>

PROPOSED ORDER

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

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
FOURTH INTERIM PETITION FOR FEES AND COSTS**

THIS CAUSE came before the Court on Integrity Plus Service's Fourth 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.

ORDERED and **ADJUDGED** that Integrity Plus Service's Fourth 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 of \$ _____ and costs of \$ _____ 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

Case No.: 04-60573 CIV-Moreno

<u>VIA ELECTRONIC MAIL</u>		
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