

Jul 26 2006

CLARENCE MADDOX
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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 K. 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.

**INTEGRITY PLUS SERVICE'S SEVENTH INTERIM REQUEST
FOR COMPENSATION FOR INVESTIGATIVE AND SECURITY
SERVICES PROVIDED TO THE RECEIVER
AND MEMORANDUM IN SUPPORT
(February 27, 2006 through May 26, 2006)**

**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 for an order awarding interim fees and costs incurred by Integrity Plus for security and investigative services provided to the Receiver, Roberto Martínez (the “Receiver”), and in support of this application, the undersigned submits the following:

1. Attached as **Exhibit 1** is a summary of Integrity Plus’ fees and expenses.
2. **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.
3. **Exhibit 3** is a summary of all Integrity Plus’ investigators, their billing rates, total hours that were charged by each and their expenses incurred from February 27, 2006 through May 26, 2006 (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 **\$4,137.50**.

¹ Integrity Plus maintains detailed time records that are kept contemporaneously with the services performed. Integrity will retain its detailed time records and will provide them to the Court for review *in camera* at the request of this Court.

4. 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.

5. 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, and conducting periodic checks of the premises. 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 during this application period for which it seeks compensation:

- a. Confer with Receiver's counsel regarding the Bauer lawsuit.
- b. Meet with Receiver's counsel and IRS representative reviewing MBC/VSI's records.
- c. Provided investigative services to the Receiver, including conducting background investigations to locate missing viators, as well as database searches of 850 viators; contacting various U.S. Embassies in Rome and Lusaka,; contacting the Legal Attache in Brazil, the Florida Department of Corrections, and Zambia Police Department. . (This work has resulted in locating the whereabouts of missing and/or deceased viators corresponding to approximately \$275,000 in face value of insurance policies.)
- d. Assist Receiver's counsel in obtaining affidavits.

6. For the Application Period, Integrity Plus seeks reimbursement of **\$8,571.37**, which includes fees in the amount of **\$8,275.00** and expenses in the amount of **\$296.37**.

7. 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 this 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 **\$8,275.00** in fees and reimbursement of **\$296.37** in costs (**total of \$8,571.37**) for this Application Period. A proposed

Order is attached.

Dated: July 13, 2006.

Respectfully submitted,

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

By: 
Carlis Sabinson

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on July 26, 2006, the foregoing was electronically filed with the Clerk of the Court, and a notice of electronic filing was sent to all individuals on the attached Service List.

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

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SERVICE LIST OF RECEIVER

Case No.: 04-60573 CIV-Moreno

VIA ELECTRONIC MAIL		
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EXHIBIT 1

EXHIBIT 1

SUMMARY OF 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	2/27/06 through 5/26/06
8	Total fees requested for this period	\$8,275.00
9	Total expenses requested for this period	\$296.37
10	Total fees and expenses award requested	<u>\$8,571.37</u>

HISTORY OF FEE APPLICATIONS

(See Attached Chart)

EXHIBIT 2

EXHIBIT 2

SUMMARY OF INTEGRITY'S FEES EXPENSES

<u>Inv. No.</u>	<u>Dates of Service From / To</u>	<u>Total Hours</u>	<u>Fees (Regular) @ \$150</u>	<u>Total Discount</u>	<u>Discounted Fees @ \$100</u>	<u>Costs</u>	<u>Total Invoice</u>
06 220	2/27/06 5/26/06	82.75	\$12,412.50	\$4,137.50	\$8,275.00	\$296.37	\$8,571.37
	TOTALS:	82.75	\$12,412.50	\$4,137.50	\$8,275.00	\$296.37	\$8,571.37

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 2/27/06 - 5/26/06]					
Sabinson, Chic	82.75	\$100.00	\$8,275.00	\$296.37	\$8,571.37
Total Hours:	82.75				
TOTAL FEES AND EXPENSES					\$8,571.37

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
SEVENTH INTERIM PETITION FOR FEES AND COSTS**

THIS CAUSE came before the Court on Integrity Plus Service's Seventh 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 Seventh 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 _____, 2006, in Miami, Florida.

FEDERICO A. MORENO
United States District Judge

Copies furnished to all counsel.