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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS:

MARC SPITZER, Chairman
JIM IRVIN
WILLIAM A. MUNDELL
JEFF MATCH-MILLER
MIKE GLEASON

2003 JUN -5 P 4:16

AZ CORP COMMISSION
DOCUMENT CONTROL

In the matter of:

MUTUAL BENEFITS CORPORATION,

Respondent.

DOCKET NO. S-03464A-03-0000

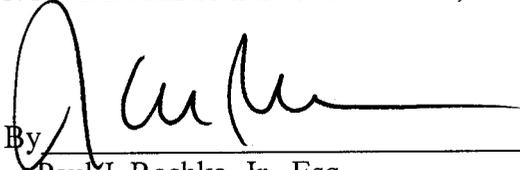
RESPONDENT'S SUPPLEMENT TO
MOTION TO QUASH SUBPOENA

Mutual Benefits Corporation hereby supplements its Motion to Quash the Subpoena of Debbie Brugliera to include Attachment A, enclosed herewith. Undersigned counsel's staff inadvertently failed to include Attachment A with the original Motion to Quash Subpoena, thereby necessitating this Supplement.

Mutual Benefits Corporation respectfully requests that the Motion to Quash and its Supplement be viewed as one filing.

RESPECTFULLY SUBMITTED this 5th day of June, 2003.

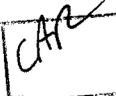
ROSHKA HEYMAN & DeWULF, PLC

By 

Paul J. Roshka, Jr., Esq.
Alan S. Baskin, Esq.
James M. McGuire, Esq.
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004
602-256-6100
602-256-6800 (facsimile)
Attorneys for Respondent
Mutual Benefits Corporation

Arizona Corporation Commission
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ROSHKA HEYMAN & DEWULF, PLC

ONE ARIZONA CENTER
400 EAST VAN BUREN - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 ORIGINAL and thirteen copies of the foregoing
hand-delivered this 5th day of June, 2003 to:

2 Docket Control
3 Arizona Corporation Commission
1200 West Washington Street
4 Phoenix, Arizona 85007

5 COPY of the foregoing hand-delivered
6 this 5th day of June, 2003 to:

7 W. Mark Sendrow, Esq.
Matthew J. Neubert, Esq.
8 Phillip A. Hofling, Esq.
Securities Division
9 Arizona Corporation Commission
10 1300 West Washington Street, 3rd Floor
Phoenix, Arizona 85007

11 Marc E. Stern
12 Administrative Law Judge
Hearing Division
13 Arizona Corporation Commission
14 1200 West Washington Street
Phoenix, Arizona 85007

15 *Ruth A. Beecher*
16 mutual.acc/pld/suppl to motion to quash subpoena.doc

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Attachment A

COMMISSIONERS
MARC SPITZER - Chairman
JIM IRVIN
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
MIKE GLEASON



BRIAN D. McNEIL
EXECUTIVE SECRETARY

MARK SENDROW
DIRECTOR

SECURITIES DIVISION
1300 West Washington, Third Floor
Phoenix, AZ 85007-2996
TELEPHONE: (602) 542-4242
FAX: (602) 564-7470
E-MAIL: accsec@ccsd.cc.state.az.us

ARIZONA CORPORATION COMMISSION

May 6, 2003

CERTIFIED MAIL

Debbie Bruglicera
Pristine Property & Investments, Inc.
3116 E. Shea Blvd. #217
Phoenix, AZ 85028

RE: Subpoena

Dear Mrs. Bruglicera:

Attached is a Subpoena for your appearance on May 20, 2003 at 9:30 A.M. at the offices of the Securities Division of the Arizona Corporation Commission, 1300 West Washington, Third Floor, Phoenix, Arizona. On that date and time, you must produce the documents listed on Exhibit "A" of the Subpoena and appear for testimony under oath.

Under the Rules of the Arizona Corporation Commission relating to formal interviews, an individual has the right to be accompanied, represented and advised by counsel. This gives you the right to have an attorney present during formal interviews and to have an attorney provide legal advice before, during and after such interviews. Your attorney may also question you briefly at the conclusion of the interview for the purpose of clarifying any of your prior testimony, and he or she may also make summary notes during the interview solely for your and your attorney's use.

Please note that the above-referenced Rules prohibit a particular attorney from representing you under certain circumstances. For your convenience, we have enclosed a copy of those Rules.

This Subpoena is being served upon you with sufficient notice in order to enable you to retain the services of an attorney, if you so wish. If you or your attorney have any questions regarding the above or the attached Subpoena, please feel free to contact the undersigned at (602) 542-0621.

Sincerely,

Phillip A. Hoffing
Attorney, Registration & Compliance

1286 WEST WASHINGTON, PHOENIX, ARIZONA 85007 / 400 WEST CONGRESS STREET, TUCSON, ARIZONA 85701
www.cc.state.az.us

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SUBPOENA

SECURITIES DIVISION
ARIZONA CORPORATION COMMISSION

TO: Debbie Brugliera
Pristine Property & Investments, Inc.
3116 E. Shea Blvd. #217
Phoenix, AZ 85028

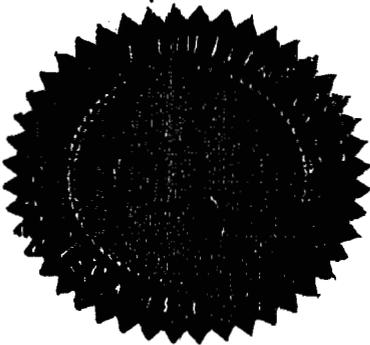
In the Matter of

Mutual Benefits Corporation
S-03464A-03-0000

involving possible violations of the Securities Act
and/or Investment Management Act of Arizona.

YOU ARE HEREBY REQUIRED to appear before Phillip A. Hofling, Esq. of the SECURITIES DIVISION of the ARIZONA CORPORATION COMMISSION at 1300 WEST WASHINGTON, THIRD FLOOR, PHOENIX, ARIZONA 85007, on the 20th day of May, 2003, at 9:30 o'clock A.M., to PROVIDE TESTIMONY AND PRODUCE THE DOCUMENTS LISTED IN EXHIBIT "A" WHICH IS ATTACHED HERETO AND INCORPORATED HEREIN BY REFERENCE.

The seal of the Arizona Corporation Commission is affixed hereto, and the undersigned, a member of said Arizona Corporation Commission, or an officer designated by it, has set his hand at Phoenix, Arizona this 6 day of May, 2003.



Matthew Neubert
Director Registration and Compliance
Securities Division

Persons with a disability may request a reasonable accommodation such as a sign language interpreter, as well as request this document in an alternative format, by contacting Shelly M. Hood, Executive Assistant to the Executive Secretary, voice phone number 602/542-3931, e-mail shood@cc.state.az.us. Requests should be made as early as possible to allow time to arrange the accommodation.

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Pursuant to A.A.C. R14-4-305, any person required to appear at a formal interview may be represented by legal counsel.

Subpoena

Debbie Brugliera

EXHIBIT A

Unless otherwise stated, from the period beginning with your first viatical settlement contract sale to the present, all books, documents, records, memoranda and other papers, whether stored on electronic media or otherwise, incident or relating to any viatical/life/senior settlement contracts you offered for sale and sold including but not limited to the following:

1. All daily time keepers, schedules, telephone logs, messages, calendars, emails, notes, diaries, or any other records of daily business;
2. All documents, letters, contracts, charts, repayment schedules, advertisements, circulars, brochures, booklets, confidential case histories, trust agreements or other information made available to you and/or purchasers of interests in viatical/life/senior settlement contracts, i.e. any participation in the benefits of a life insurance policy;
3. Names, addresses, and telephone numbers of all individuals who were offered or purchased interests in viatical/life/senior settlement contracts, including the amounts paid and dates of purchase and the account or accounts into which purchaser proceeds were placed;
4. All correspondence, email, or other contacts with individuals who were offered or purchased interests in viatical/life/senior settlements.
5. All records of commissions, salaries, bonuses, draws, fees or any other compensation paid to you or to your representatives or assigns or to any third party on your behalf as a result of the sale of viatical/life/senior settlement contracts;
6. All correspondence, contracts, agreements, applications, forms, or other documentation between you and any viatical/life/senior settlement contract provider company or viatical/life/senior settlement broker;
7. All viator (insured) profiles, contracts, purchase agreements, correspondence, medical records, patient medical summaries, medical updates, insurance records and other documentation;
8. All agreements, including agency agreements and policy purchase agreements, contract addenda, policy diversification statements, trust agreements, escrow agreements, escrow instructions, contracts, insurance policies, irrevocable designations of beneficiary, correspondence, letters of intent, assignments of proceeds, assignments of beneficial interest, change in beneficiary, release of beneficiary, fee agreements, special power of attorney or any other documentation relating to the offer, sale and/or purchase of viatical/life/senior settlement contracts;
9. All records of payments made to viatical/life/senior settlement investors upon maturity of life insurance policies.

R14-4-305. Rights of witnesses; formal interview; procedures

A. Any person required or requested to appear as a witness at a formal interview may be accompanied, represented, and advised by a lawyer. The lawyer's roll during the formal interview shall be limited to the following activities:

1. Giving legal advice to the witness before, during, and after the formal interview;
2. Questioning the witness briefly at the conclusion of the formal interview for the purpose of clarifying any testimony the witness has given; and
3. Making summary notes during the formal interview solely for the use of the witness and the lawyer.

B. Notwithstanding Subsection (A), the following lawyers may not represent witnesses:

1. Any lawyer who has represented another witness who has testified at a formal interview in the examination or investigation,
2. Any lawyer who has represented another person who is a subject of the examination or investigation,
3. Any lawyer who may be a material witness in the examination or investigation,
4. Any lawyer who is subject of the examination or investigation.

C. The Director may permit a lawyer to represent a witness in those situations described in subsections (B)(1) through (B)(4) upon a showing that such representation should be permitted in the interest of justice and will not obstruct the examination or investigation. If a lawyer is not permitted to represent a witness under Subsection (B), that lawyer's partners or associates of the lawyer's law firm are also precluded from representing the witness.

D. All formal interviews may be recorded by the Division either mechanically or by a shorthand reporter employed by the Division. No other recording of the formal interview will be permitted, except summary note taking.

E. Unless permitted in the discretion of the Division, no witness or lawyer accompanying such witness shall be permitted to be present during the formal interview of any other witness testifying in a nonpublic examination or investigation. No person not employed by the Commission or the Attorney General shall be present during a formal interview except that the Division may authorize members of law enforcement or other state, federal or self-regulatory agencies to be present during such formal interview.

F. The Division may exclude from a formal interview any person previously permitted to attend the formal interview, including a lawyer, whose conduct is dilatory, obstructionist, or contumacious. In addition, the members of the staff of the Division conducting the formal

interview may report the conduct to the Director for appropriate action. The Director may thereupon take such further action as circumstances may warrant, including, but not limited to, exclusion from further participation in the examination or investigation.

G. A person who has submitted documentary evidence or testimony in connection with a formal interview shall be entitled, upon written request, and upon proper identification, to inspect the witness' own testimony on a date to be set by the Director. The Director may delay the inspection of the record until the conclusion of the examination or investigation if, in the Director's discretion, the Director determines that earlier inspection may obstruct or delay the examination or investigation.

H. In connection with an examination or investigation, the Director may delegate authority to members of the staff to administer oaths and affirmations, sign subpoenas, take evidence, and receive books, papers, contracts, agreements or other documents, records, or information, whether filed or kept in original or copied form or electronically stored or recorded.

I. During a formal interview, a witness shall not knowingly make any untrue statements of material fact or omit to state any material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

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