



IVIEWIT HOLDINGS, INC.

By Email

Monday, November 22, 2004

Jay S. Fishman
CEO and Director
The St. Paul Travelers Companies, Inc.
385 Washington St.
St. Paul, MN 55102

Re: **CLAIM AGAINST YOUR INSURED MELTZER LIPPE GOLDSTEIN
WOLFE & SCHLISSEL LLP**

Dear Mr. Fishman,

We are in receipt of a letter from your counsel Garcia and Stallone, whom you retained to handle the claim asserted by Iviewit against Meltzer Lippe Goldstein Wolfe and Schlissel LLP (“MLGWS”) and an attorney at MLGWS - Raymond A. Joao (“Joao”). From review of the letter, it is missing essential facts, such as that Joao’s responses to counsels interviews did not include the fact that orders have been given by the New York State Supreme Court Appellate Division: First Department (“First Department”) that require an “investigation” into the complaint against Joao. We have attached for your review the court order, transferring the Joao complaint due to conflicts of interest and appearances of impropriety discovered at the First Department.

We also are unclear if Garcia and Stallone reviewed the rebuttal to Joao’s response to the First Department which was a 1700 page document containing evidence against Joao filed by Iviewit and for which Joao has yet to respond to. Seeing that the matters are far from completed in the New York courts regarding your client, we are unclear why Garcia and Stallone rushed to judgment with pending litigation against Joao still under investigation in the disciplinary department and elsewhere.

Due to the ongoing investigations of Joao at;

1. The New York Supreme Court Appellate Division: Second Department Departmental Disciplinary Committee
2. The United States Patent and Trademark Office (“USPTO”) – Office of Enrollment and Discipline (“OED”) in a complaint filed against Joao with Harry I. Moatz (“Moatz”), Director of OED, and
3. USPTO investigation into charges of fraud upon the USPTO by Joao filed with the Commissioner of Patents at the bequest of Moatz and filed by Iviewit and its largest shareholder Crossbow Ventures of West Palm Beach Florida (signed by Stephen Warner founder of the fund)
4. The Federal Bureau of Investigation
5. The Boca Raton Police Department
6. The Florida Supreme Court

With all of these investigations and others still remaining active and open, it seems remarkable and premature that St. Paul has determined that the carrier need not reserve for this claim. For your information, the USPTO has suspended the patent applications of Iviewit due to initial review of the work done by Joao, as there appears to be indications of fraud and while investigations continue.

Mr. Fishman, in contacting you directly regarding the seventeen billion dollar (US \$17,000,000,000.00) liability that may result from damages caused by Joao and MLGWS we anticipated that your company would look into the matters with proper and full due diligence and are surprised that Garcia and Stallone only preformed a cursory and superficial investigation, accepting Joao’s story as gospel without checking the accuracy of his statements. We notified you of the initial problems we had in filing the claim and getting any assurance from the agents and claims representatives that this matter had been complying with proper procedure for reporting and disclosure as mandated by insurance industry regulations and we remain unclear if proper compliance has been followed. The Garcia and Stallone letter at first glance appears to be further sidestepping the issues, although we remain unclear if Joao and MLGWS have fully disclosed the entirety of the situation to either St. Paul Travelers or Garcia and Stallone, we will await your response in formulating our conclusion.

Due to the severity of the claims and the conclusions proffered in the Garcia & Stallone letter, we must honor the continued insistence of our shareholders in pursuing this matter. As some of the shareholders are heavyweights in the insurance industry they insist that we notify the appropriate state regulatory agencies regarding our claim, assure them that compliance with the reserve requirements has been met by St. Paul Travelers, provide assurance that reporting and disclosure requirements have been met and that all other regulatory protocols have been followed in the handling of these matters. Thus, please provide us with the following information:

1. The date the claim was reported
2. Claim number
3. The date the claim was officially recorded
4. A copy of the MLGWS policy with St. Paul
5. A copy of the information provided by Joao to Garcia & Stallone (or list of such information)

6. Confirmation that the claim filed with St. Paul was properly docketed and handled in compliance with all state and federal insurance codes, rules and regulations

We have been advised that applicable rules and regulations will result in the claim remaining open and reserves being met, especially in light of the ongoing investigations involving Joao, as listed above. Please confirm the file remains active and open, so as to prevent the filing of a mandamus action and notification to the insurance regulators of possible compliance problems.

If you any questions or need additional information, please feel free to call me at 561.364.4240 or our attorney Marc Garber at 215.934.7775.

Best regards,

A handwritten signature in black ink, appearing to read 'E. Bernstein', written in a cursive style.

Eliot I. Bernstein
President

cc: Marc Garber, Esq.
Caroline Prochotska Rogers, Esq.
P. Stephen Lamont

DEPARTMENTAL DISCIPLINARY COMMITTEE
SUPREME COURT, APPELLATE DIVISION
FIRST JUDICIAL DEPARTMENT
61 BROADWAY
NEW YORK, N.Y. 10006
(212) 401-0800
FAX: (212) 401-0810

RECEIVED
By Eliot I. Bernstein at 3:50 pm, 9/12/04

September 7, 2004

PERSONAL AND CONFIDENTIAL

Honorable James Pelzer
Clerk of the Court
Supreme Court, Appellate Division
Second Judicial Department
45 Monroe Place
Brooklyn, New York 11201

Re: Matter of Kenneth Rubenstein, Esq. - 2003.0531
Matter of Raymond A. Joao, Esq. - 2003.0532
Matter of Steven C. Krane, Esq. - 2004.1883

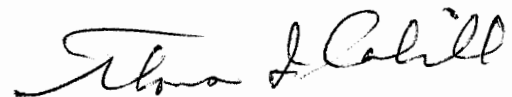
Dear Mr. Pelzer:

The above referenced complaints were filed with the Committee and involve the representation of one of the respondents by an attorney who also serves as a Departmental Disciplinary Committee referee. Consequently, to avoid an appearance of impropriety the Appellate Division, First Judicial Department, has transferred the matters to your Court for assignment to a grievance committee that you deem appropriate.

As a result, I am forwarding herein copies of the Orders, complaints, and related documents, and respectfully request that you submit the matters to a grievance committee in your Department for whatever action they deem fit and proper.

Thank you for your attention to this matter.

Very truly yours,



Thomas J. Cahill

TJC/nkd

Encls:

cc: Kenneth Rubenstein, Esq.
Raymond A. Joao, Esq.
Steven C. Krane, Esq.
Eliot I Bernstein & P. Stephen Lamont

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JUDITH N. STEIN
RAYMOND VALLEJO
LA TRISHA A. WILSON
STAFF COUNSEL

RECEIVED
By Eliot I. Bernstein at 3:50 pm, 9/12/04

SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION : FIRST DEPARTMENT
-----X

In the Matter of an Attorney and
Counselor-at-Law:

M-3198

Departmental Disciplinary Committee
for the First Judicial Department,

Petitioner.

NOTICE OF ENTRY

-----X

PLEASE TAKE NOTICE that the within is a certified copy
of an unpublished order and decision duly made in this
proceeding and duly entered and filed in the office of the
Clerk of the Supreme Court of the State of New York, Appellate
Division, First Department, on the 11th day of August, 2004.

DATED: New York, New York
September 7, 2004

Yours, etc.,

THOMAS J. CAHILL
Chief Counsel
Departmental Disciplinary
Committee for the First
Judicial Department
61 Broadway - 2nd Floor
New York, NY 10006
(212) 401-0800

RECEIVED

By Eliot I. Bernstein at 3:50 pm, 9/12/04

To: Steven C. Krane, Esq.
Proskauer Rose LLP
1585 Broadway
New York, New York 10036

Eliot I. Bernstein
P. Stephen Lamont
Iviewit Holdings, Inc.
10158 Stonehenge Circle, Suite 801
Boynton Beach, Florida 33437

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RECEIVED

By Eliot I. Bernstein at 3:51 pm, 9/12/04

UNPUBLISHED ORDER

At a Term of the Appellate Division of the Supreme Court held in and for the First Judicial Department in the County of New York on August 11, 2004.

PRESENT: Hon. Angela M. Mazzarelli, Justice Presiding,
Richard T. Andrias
David B. Saxe
David Friedman
Luis A. Gonzalez, Justices.

FILED

AUG 11 2004

Appellate Division, Supreme Court
First Department

-----X
In the Matter of an Attorney and
Counselor-at-Law:

Departmental Disciplinary Committee
for the First Judicial Department,

Petitioner.

UNPUBLISHED ORDER

M-3198

-----X
The Departmental Disciplinary Committee for the First Judicial Department, by Thomas J. Cahill, its Chief Counsel, having moved this Court on August 2, 2004, for an order granting movant permission to transfer the investigation and disposition of a complaint under Docket Number 1883/04 to a Grievance Committee in another Judicial Department, or to any other disciplinary jurisdiction this Court deems appropriate,

Now, upon reading and filing the papers with respect to the motion, and due deliberation having been had thereon, it is unanimously

Ordered that the motion is granted and the complaint under Docket Number 1883/04 is transferred to the Appellate Division, Second Judicial Department, for investigation and disposition.

ENTER:

APPELLATE DIVISION SUPREME COURT FIRST DEPARTMENT
STATE OF NEW YORK

David Apolony
Clerk
DEPUTY CLERK

I, CATHERINE O'HAGAN WOLFE, Clerk of the Appellate Division of the Supreme Court First Judicial Department, do hereby certify that I have compared this copy with the original thereof filed in said office on 8/11/04 and that the same is a correct transcript thereof, and of the whole of said original.
IN WITNESS WHEREOF I have hereunto set my hand and affixed the seal of this Court on 8/11/04.

Catherine O'Hagan Wolfe
CLERK

RECEIVED

By Eliot I. Bernstein at 3:51 pm, 9/12/04

SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION : FIRST DEPARTMENT

-----X

In the Matter of an Attorney and
Counselor-at-Law:

M-2820

M-3212

Departmental Disciplinary Committee
for the First Judicial Department,

NOTICE OF ENTRY

Petitioner.

-----X

PLEASE TAKE NOTICE that the within is a certified copy
of an unpublished order and decision duly made in this
proceeding and duly entered and filed in the office of the
Clerk of the Supreme Court of the State of New York, Appellate
Division, First Department, on the 11th day of August, 2004.

DATED: New York, New York
September 7, 2004

Yours, etc.,

THOMAS J. CAHILL
Chief Counsel
Departmental Disciplinary
Committee for the First
Judicial Department
61 Broadway - 2nd Floor
New York, NY 10006
(212) 401-0800

To: Kenneth Rubenstein, Esq.
c/o Steven C. Krane, Esq.
Proskauer Rose
1585 Broadway
New York, New York 10036

Raymond A. Joao, Esq.
c/o John Fried, Esq.
Fried & Epstein, LLP
1350 Broadway, Suite 1400
New York, New York 10018

Eliot I. Bernstein
P. Stephen Lamont
Iviewit Holdings, Inc.
10158 Stonehenge Circle, Suite 801
Boynton Beach, Florida 33437

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UNPUBLISHED ORDER

At a Term of the Appellate Division of the Supreme Court held in and for the First Judicial Department in the County of New York on August 11, 2004.

PRESENT: Hon. Angela M. Mazzarelli,
Richard T. Andrias
David B. Saxe
David Friedman
Luis A. Gonzalez,

Justice President,

FILED

AUG 11 2004

Justices.

**Appellate Division, Supreme Court
First Department**

-----X
In the Matter of an Attorney and
Counselor-at-Law:

Departmental Disciplinary Committee
for the First Judicial Department,

UNPUBLISHED ORDER

M-2820

M-3212

Petitioner.
-----X

The Departmental Disciplinary Committee for the First Judicial Department, by Thomas J. Cahill, its Chief Counsel, having moved this Court on July 12, 2004, for an order granting movant permission to transfer the investigation and disposition of complaints under Docket Numbers 531 and 532/03 to a Grievance Committee in another Judicial Department, or to any other disciplinary jurisdiction this Court deems appropriate (M-2820),

And the motion papers executed by Eliot I. Bernstein and P. Stephen Lamont, dated July 8, 2004, seeking immediate investigation of complaints against certain specified attorneys, the striking of the Departmental Disciplinary Committee's motion, and for related relief, having been deemed a cross motion (M-3212),

Now, upon reading and filing the papers with respect to the motion, and due deliberation having been had thereon, it is unanimously

Ordered that the motion is granted and the complaints under Docket Numbers 531/03 and 532/02 are transferred to the Appellate Division, Second Judicial Department, for investigation and disposition. The cross motion is granted only to the extent of transferring said complaints to the Appellate Division, Second Judicial Department, Numbers in said manner and is otherwise denied.

APPELLATE DIVISION SUPREME COURT FIRST DEPARTMENT
STATE OF NEW YORK

I, CATHERINE O'HAGAN WOLFE, Clerk of the Appellate Division of the Supreme Court First Judicial Department, do hereby certify that I have compared this copy with the original thereof filed in said office on 8/11/04 and that the same is a correct transcript thereof, and of the whole of said original.
IN WITNESS WHEREOF I have hereunto set my hand and affixed the seal of this Court on 8/11/04.

David Anthony
Clerk.
DEPUTY CLERK

Catherine O'Hagan Wolfe
CLERK