IN THE DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND PROFESSIONAL REGISTRATION STATE OF MISSOURI

IN RE:	)	
	)	
AFFINITY GROUP BENEFITS	)	
ASSOCIATION, INC.,	)	**Case No. 10-0115057C**
AMERICAN TRADE ASSOCIATION,	)	
AMERICANS FOR AFFORDABLE	)	
HEALTHCARE, INC.,	)	
BEEMA-PAKISTAN ASSURANCE, LTD.	)	
A/K/A BEEMA-PAKISTAN COMPANY	)	
LIMITED,	)	
KEY BENEFITS ADMINISTRATORS, INC.,	)	
NATIONAL ALLIANCE OF ASSOCIATIONS,	)	
NATIONAL TRADE BUSINESS ALLIANCE	)	
OF AMERICA,	)	
PEAK MEMBERSHIP ALLIANCE,	)	
PROFESSIONAL BENEFITS	)	
CONSULTANTS A/K/A PBC DIRECT A/K/A	)	
PROFESSIONAL BENEFIT CONSULTANTS	)	
OF DEL. INC.,	)	
REAL BENEFITS ASSOCIATION,	)	
SERVE AMERICA ASSURANCE LTD. A/K/A		
SERVE AMERICA ASSURANCE LTD.	)	
COMPANY A/K/A SERVE AMERICA	)	
ASSURANCE,	)	
SMART DATA SOLUTIONS, LLC,	)	
SPENCER & ASSOCIATES, LLC,	)	
CHRISTOPHER ASHIOTES,	)	
RICHARD BACHMAN,	)	
EARNEST BEALL,	)	
DAVID L. CLARK,	)	
WALTER CECCHINI,	)	
JAMES M. DOYLE,	)	
OBED KIRKPATRICK,	)	
RAYMOND B. MCCARTHY,	)	
BART S. POSEY SR.,	)	
THOMAS J. SULLIVAN,	)	
WILLIAM M. WORTHY, and	)	
COLIN YOUELL,	)	
	)	
Respondents.	)	

STATEMENT OF CHARGES
& ORDER TO SHOW CAUSE

COMES NOW, the Division of the Consumer Affairs of the Department of Insurance, Financial Institutions and Professional Registration to initiate administrative enforcement proceedings against Affinity Group Benefits Association, Inc., American Trade Association, Americans for Affordable Healthcare, Inc., Beema-Pakistan Assurance, Ltd. a/k/a Beema-Pakistan Company Limited, Key Benefits Administrators, Inc., National Alliance of Associations, National Trade Business Alliance of America, Peak Membership Alliance, Professional Benefits Consultants a/k/a PBC Direct a/k/a Professional Benefit Consultants of Del. Inc., Real Benefits Association, Serve America Assurance Ltd. a/k/a Serve America Assurance Ltd. Company a/k/a Serve America Assurance, Smart Data Solutions, LLC, Spencer & Associates, LLC, Christopher Ashiotes, Richard Bachman, Earnest Beall, David L. Clark, James M. Doyle, Obed Kirkpatrick, Bart S. Posey Sr., and Thomas J. Sullivan, William M. Worthy, Colin Youell (collectively, "Respondents") pursuant to §§374.046 and 374.047, RSMo (Supp. 2008),[1] for acting as a discount medical plan organization without first being registered with the Department, based on the following Statement of Charges.

JURISDICTION & RELEVANT STATUTES

1. Section 376.1500 defines "discount medical plan" and "discount medical plan organization" as follows:

> "Discount medical plan", a business arrangement or contract in which a person, in exchange for fees, dues, charges, or other consideration, provides access for plan members to providers of medical services and the right to receive medical services from those providers at a discount. The term does not include any product regulated as an insurance product, group health service product or membership in a health maintenance organization in this state or discounts provided by an insurer, group health service, or health maintenance organizations where those discounts are provided at no cost to the insured or member and are

[1] All statutory references are to RSMo (Supp. 2008) unless otherwise indicated.

offered due to coverage with a licensed insurer, group health service, or health maintenance organization. The term does not include an arrangement where the discounts or prices are sold, rented or otherwise provided to another licensed carrier or to a self-insured or self-funded employer sponsored plan or Taft-Hartley trust, or licensed third party administrator;[2]

"Discount medical plan organization", means a person or an entity that, in exchange for fees, dues, charges or other consideration, provides access for plan members to providers of medical services and the right to receive medical services from those providers at a discount. It is the person or organization that contracts with providers, provider networks or other discount medical plan organizations to offer access to medical services at a discount and determines the charge to plan members;[3]

2. Missouri law places certain limitations on the operation of discount medical plans in Missouri. Specifically, §376.1502.1 states:

> It is unlawful to transact business in this state as a discount medical plan organization, unless the organization is a corporation, limited liability corporation, partnership, limited liability partnership or other legal entity organized under the laws of this state or, if a foreign entity, authorized to transact business in this state, and is registered as a discount medical plan organization with the director or duly authorized by the director as an insurance company, licensed health maintenance organization, licensed group health service organization, or licensed third-party administrator.

3. Pursuant to § 376.1510 a discount medical plan shall not:

> (1) Use in its advertisements, marketing material, brochures, and discount cards the terms "health plan", "coverage", "co-pay", "co-payments", "preexisting conditions", "guaranteed issue", "premium", "PPO", "preferred provider organization", or other terms in a manner that could reasonably mislead a person to believe that the discount medical plan is health insurance;
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> ***
>
> (3) Pay providers any fees for medical services;
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> ***

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[2] This section was enacted by H.B. 818 and S.B. 66 during the First Regular Session of the 94th General Assembly, 2007. Due to possible conflict, both versions are printed in the Revised Statutes. The S.B. 66 version omits the words "or licensed third party administrator."

[3] This section was enacted by H.B. 818 and S.B. 66 during the First Regular Session of the 94th General Assembly, 2007. Due to possible conflict, both versions are printed in the Revised Statutes. The H.B. 818 version defines "Discount medical plan organization" as "a person or an entity that operates a discount medical plan."

> (4) Collect or accept money from a member for payment to a provider for specific medical services furnished or to be furnished to the member, unless the organization is licensed by the director to act as an administrator; or
> (5) Except as otherwise provided in sections 376.1500 to 376.1532, as a disclaimer of any relationship between discount medical plan benefits and insurance, or as a description of an insurance product connected with a discount medical plan, use in its advertisements, marketing material, brochures, and discount cards the term "insurance".

4. The Director of the Department of Insurance, Financial Institutions and Professional Registration ("Director") is authorized to issue a cease and desist order pursuant to the provisions of § 374.046, "[i]f the director determines that a person has engaged, is engaging, or has taken a substantial step toward engaging in a violation of sections 376.1500 to 376.1532, or a rule adopted or order issued pursuant thereto, or that a person has materially aided or is materially aiding an act, practice, omission, or course of business constituting a violation of sections 376.1500 to 376.1532 or a rule adopted or order issued pursuant thereto . . . A violation of sections 376.1500 to 376.1532 is a level two violation under section 374.049, RSMo."

5. The jurisdiction of the Director, and the specific procedure to initiate and administer this proceeding is found in § 374.046.1 which provides, in part:

> If the director determines based upon substantial and competent evidence that a person has engaged, is engaging in or has taken a substantial step toward engaging in an act, practice, omission, or course of business constituting a violation of the laws of this state relating to insurance in this chapter, chapter 354, RSMo, and chapters 375 to 385, RSMo, or a rule adopted or order issued pursuant thereto or that a person has materially aided or is materially aiding an act, practice, omission, or course of business constituting a violation of the laws of this state relating to insurance in this chapter, chapter 354, RSMo, and chapters 375 to 385, RSMo, or a rule adopted or order issued pursuant thereto, the director may order the following relief:
>
> (1) An order directing the person to cease and desist from engaging in the act, practice, omission, or course of business;
> (2) A curative order or order directing the person to take other action necessary or appropriate to comply with the insurance laws of this state;
> (3) Order a civil penalty or forfeiture as provided in section 374.049; and
> (4) Award reasonable costs of the investigation.

6. Section 374.049 authorizes the Director to impose a civil penalty or forfeiture of $1,000 per each level two 2 violation, up to an aggregate civil penalty or forfeiture of $50,000 per year for multiple violations. The Director is authorized to enhance the civil penalty or forfeiture with one-classification step increase if the violation was knowing. Section 374.049 authorizes the Director to impose a civil penalty or forfeiture of $5,000 per each level three 3 violation, up to an aggregate civil penalty or forfeiture of $100,000 per year for multiple violations. The Director is authorized to enhance the civil penalty or forfeiture with a two-level classification increase if the violation was knowingly committed in conscious disregard of the law. Section 374.049 authorizes the Director to impose a civil penalty or forfeiture of $10,000 per each level four violation, up to an aggregate civil penalty or forfeiture of $250,000 per year for multiple violations.

7. Sections 374.049 and 374.280 authorize the Director to impose a monetary penalty or forfeiture depending on the level of the violation payable to the state of Missouri.

8. This proceeding is in the public interest.

PARTIES

9. Affinity Group Benefits Association, Inc. (AGBAI) was organized as a non-profit corporation in North Carolina in March 1978. AGBAI is located at 4676 Highway 41 North Springfield, Tennessee 37172. Respondent Obed Kirkpatrick is or was the vice president of AGBAI. Respondent Earnest Beall is or was the registered agent in North Carolina for AGBAI.

10. American Trade Association (ATA) is an Arkansas limited liability company and an Indiana not-for-profit corporation with a principal place of business in Springfield, Tennessee. Transportation Services Association (TSA) is or was an Indiana not-for-profit corporation and TWBA, Inc. were predecessors to ATA. ATA uses Respondent Smart Data Solutions, LLC as a

third party administrator. Respondent Obed Kirkpatrick is or was the president of ATA. Respondent Richard Bachman is or was the vice president of ATA.

11. Americans for Affordable Healthcare, Inc. (AFAH) is a foreign nonprofit corporation incorporated in the state of Arizona and registered with the Missouri Secretary of State with the business purpose of "Operated to receive, administer and expend funds to promote the availability of suitable services and benefits to seniors in the United States". AFAH utilizes Spencer & Associates, LLC, as a third party administrator.

12. Beema-Pakistan Assurance Company Ltd. (Beema) a/k/a Beema-Pakistan Company Limited is believed to be a corporation organized under the laws of Pakistan with a principal place of business in Karachi, Pakistan. Beema is a parent to Respondent Serve America Assurance Ltd.

13. Key Benefits Administrators, Inc. (KBA) is an entity whose organization form is unknown. KBA's principal place of business is located at P.O. Box 519, Fort Mill, South Carolina 29716. KBA acted as a third party administer for Respondent National Trade Business Alliance of America.

14. National Alliance of Associations (NAA) is a non-profit corporation registered with the New Jersey Secretary of State. NAA is located at 141 Ganttown Road, Suite C, Turnersville, New Jersey 08012. Respondent Thomas J. Sullivan is or was the president of NAA.

15. National Trade Business Alliance of America (NTBAA) is an association whose principal place of business is or was located 141 Ganttown Road, Turnersville, New Jersey 08012. Respondents Thomas J. Sullivan and Christopher Ashiotes each served as president of NTBAA.

16. Peak Membership Alliance (PMA) is an entity whose organization form is unknown and its principal place of business is located at 141 Ganttown Road, Suite D, Blackwood, New Jersey 08012-1649. PMA is associated with AGBAI, KBA, Respondent Real Benefits Association, and Respondent Smart Data Solutions, LLC.

17. Professional Benefits Consultants (PBC) a/k/a PBC Direct a/k/a Professional Benefit Consultants of Del. Inc. is a for profit corporation organized under the laws of Delaware. PBC's principal place of business is located at 141 Ganttown Road, Turnersville, New Jersey 08012. PBC automatically deducted payments from at least one Missouri consumer's bank account on behalf of PMA.

18. Real Benefits Association (RBA) is a New Jersey limited liability company with an address in New York, New York. Respondent David L. Clark is or the chairman of RBA.

19. Serve America Assurance Ltd. (SAAL) a/k/a Serve America Assurance Ltd. Company a/k/a Serve America Assurance is or was established as a domestic limited liability company in South Carolina in February 2009. SAAL was dissolved in September 2009. SAAL is believed to be a subsidiary of Beema. SAAL holds or held itself out as the underwriting insurer for ATA and RBA. Respondent Richard Bachman created and owns or previously owned www.serveamericaltd.com, a website for SAAL through www.godaddy.com. The contact information on www.serveamericaltd.com lists as a contact address the same Pakistan address provided to the Department by Beema.

20. Smart Data Solutions, LLC (SDS) is a Tennessee limited liability company with its principal place of business at 4676 Highway 41 North, Springfield, Tennessee 37172. Respondents Richard Bachman and Bart S. Posey, Sr. are corporate officers for SDS. SDS acts as a third party administrator for AGBAI.

21. Spencer & Associates, LLC, is located at 1 South Limestone Street, Suite 301, Springfield, Ohio 45502. Spencer & Associates is licensed as a third party administrator by the Ohio Department of Insurance. Spencer & Associates, LLC acts as a third party administrator for AFAH.

22. Christopher Ashiotes is an individual person residing in New Jersey. Ashiotes served as president of NTBAA.

23. Richard Bachman is an individual person residing in Springfield, Tennessee. Bachman is or was an officer for SDS. Bachman is or was the vice president of ATA.

24. Earnest Beall is an individual person residing in North Carolina. Beall owns or owned AGBAI. Beall acquired AGBAI when it was a dormant association with no members. Beall intended to use AGBAI to provide benefits, including insurance, to members; however, Beall never enrolled any members.

25. Walter R. Cecchini, Jr. is an individual residing in West Palm Beach, Florida. Cecchini is the chairman and president of TWBA, Inc., an Indiana not-for-profit corporation, first incorporated in July 1986. Cecchini was the incorporator, registered agent, and chairman of Transportation Workers Benefits Association, Inc., a Florida not-for-profit corporation that was incorporated in June 2006 and dissolved in April 2008. Cecchini is also associated with TSA, a predecessor to ATA.

26. David L. Clark is an individual believed to be residing in New York, New York. Clark is or was the chairman of RBA.

27. James Doyle is an individual person residing in Sewell, New Jersey. Doyle is associated with NAA, AGBAI, SDS, and AFAH.

28. Obed Kirkpatrick is an individual person residing in Tennessee. Kirkpatrick is or was the president of ATA.

29. Raymond B. McCarthy is an individual person residing in Newark, Delaware. McCarthy is or was the vice president of PBC.

30. Bart S. Posey, Sr. is an individual person residing in Tennessee. He is or was an officer for SDS and ATA. Posey owns the building located at 4676 Highway 41 North, Springfield, Tennessee 37172.

31. Thomas J. Sullivan is an individual person residing in New Jersey. Sullivan is or was the president of NAA and NTBAA. Sullivan is or was associated with AGBAI, SDS, and AFAH.

32. William M. Worthy is an individual residing in South Carolina. Worthy was licensed by the Department as a non-resident individual insurance producer from July 16, 2004 until July 17, 2006. (License No. 0134851). Worthy is or was the president of TSA and ATA.

33. Colin Youell is an individual residing in West Palm Beach, Florida. Youell is or was a director of Transportation Workers Benefits Association, Inc. a/k/a TSA a/k/a TWBA, Inc. a/k/a ATA, and is or was a board member of Beema.

34. For all times relevant herein, Respondents have not been authorized by the Director as an insurance company, licensed health maintenance organization, licensed group health service organization, or licensed third-party administrator.

35. For all times relevant herein, Respondents have not been registered with the Department as a discount medical plan organization.

CHARGE

36. Respondents, individually or collectively, have engaged, are engaging in, or have taken a substantial step toward engaging in an act, practice or course of business constituting a

violation of § 376.1502 by acting, offering to act, or holding themselves out to be a discount medical plan organization in this state without first registering as a discount medical plan organization with the Director or being duly authorized by the Director as an insurance company, licensed health maintenance organization, licensed group health service organization, or licensed third-party administrator.

37. The facts are as follows:

a. At least 148 Missouri consumers purchased a product from Respondents. Many did so after receiving a "junk fax" advertising "AFFORDABLE HEALTHCARE PLANS!" or a "policy."

b. These purchases generated many consumer complaints to the Department. Consumers complained of non-payment of claims and many consumers requested cancellations or refunds. Consumers had difficulty obtaining cancellations and refunds.

c. Respondents, individually or collectively, provided documentation to Missouri consumers that stated "This is not a discount plan!"

d. Respondents, individually or collectively, provided consumers with a variety of identification cards.

e. The identification cards frequently referred to Respondents as the "insurer" and contained additional statements such as "Insurance I.D. Card Plan C-500."

f. Respondents, individually or collectively, provided documentation to Missouri consumers indicating that Respondents were part of a "PPO Network."

g. Respondents, individually or collectively, provided documentation to Missouri consumers referring to the consumer as the "Insured" and included references to

"INSURED EFFECTIVE DATE," "DEPENDENT COVERAGE," "BENEFIT COVERAGE," "TERMINATION OF INSURANCE," "Group Health Plan," and "health care coverage."

h. Respondents, individually or collectively, provided documentation to Missouri consumers that defined the "Application or Enrollment Form" as "The form completed and signed to apply for this insurance coverage."

i. Respondents, individually or collectively, provided documentation to Missouri consumers stating that Respondents were third party administrators.

j. Many Missouri consumers reasonably believed they were purchasing insurance from Respondents.

k. Consumers have been harmed by Respondents' actions. For example:

   i. Consumer A, a Missouri resident, entered into a contract for discount medical services with AFAH on or about August 1, 2008.

   ii. Consumer A obtained healthcare services from Hannibal Clinic Operations, LLC (Hannibal Clinic) located at 100 Medical Drive, Hannibal, Missouri 63401.

   iii. Hannibal Clinic attempted to collect payment for the healthcare services it provided to Consumer A.

   iv. AFAH denied the claim.

   v. On or about February 23, 2009, Hannibal Clinic Billing Supervisor, Lori Cox, filed a complaint with the Department against AFAH for failure to pay claims due in the amount of $60,304.80.

vi. On or about March 10, 2009, a Department investigator sent a letter to AFAH requesting a response to the complaint.

vii. On or about March 31, 2009, Terri Thomas, on behalf of AFAH, sent a letter to the Department indicating that she could not respond to the Department's request because AFAH uses Spencer & Associates, LLC as a third party administrator.

viii. Consumer A died in July 2009 while trying to resolve his medical bills with AFAH and Spencer & Associates, LLC.

l. As a further example:

i. Consumer B is a Missouri resident who lives in Lamar, Missouri.

ii. At the age of 63, Consumer B joined an association in response to an unsolicited fax received in July 2007. The unsolicited fax advertised "LOW COST QUALITY HEALTH INSURANCE!" and a "Free flu shot." Consumer B purchased the product specifically to obtain a free flu shot.

iii. In January 2008, Consumer B received a letter from NAA and AGBAI/SDS stating that AGBAI/SDS assumed the members of NAA which had assumed the members of Consumer B's association.

iv. In 2007 and 2008, Consumer B paid $1,717 in membership fees between September 2007 and April 2008.

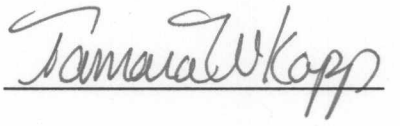
v. On October 23, 2007, Consumer B obtained a flu shot from Dr. Jonathan Manzer. Dr. Manzer submitted a claim on Consumer B's behalf to AGBAI/SDS's third party administrator. AGBAI/SDS denied Consumer

B's claim noting that the flu shot was "not a covered service under the terms of your policy."

vi. Consumer B attempted to contact her association by phone on multiple occasions. Finding that method unsuccessful, Consumer B wrote to the association in February 2008 and again in March 2008 to obtain coverage for the flu shot.

vii. Upon information received from Consumer B, the Department believes Consumer B has never received coverage for the flu shot she obtained in October 2007.

Respectfully submitted,



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ATTORNEY FOR DIVISION OF CONSUMER AFFAIRS

SHOW CAUSE ORDER

IT IS ORDERED THAT Respondents shall appear before me or a designated hearing officer on February 17, 2010, at 10 a.m. at the 301 West High Street, Room 530, Jefferson City, Missouri to **SHOW CAUSE** why:

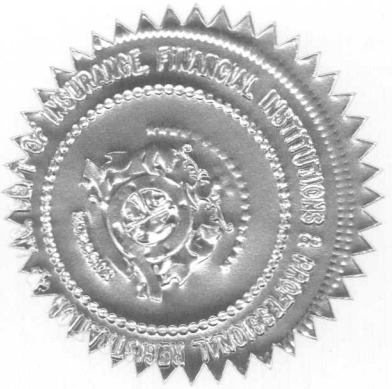
(1) a Cease and Desist Order should not be issued against Respondents;

(2) a curative order or other orders should not be issued; and

(3) other relief, including penalties in the amount of $250,000 for knowingly violating § 376.1502 in conscious disregard of the law and investigation costs in the amount of $5,284.90 should not be granted against Respondents.

SO ORDERED.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of my office in Jefferson City, Missouri, this 1st day of February, 2010.



John M. Huff
Director

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing, including all attachments, was sent by certified mail via the United States Postal Service on this 2nd day of February, 2010 to:

Affinity Group Benefits Association, Inc.
Ernest B. Beall, Registered Agent
AGBAI-SDS
4676 Highway 41 North
Springfield, Tennessee 37172
Certified Mail # 7007 3020 0003 1572 4704

Americans for Affordable Healthcare, Inc.
c/o Registered Agent for Americans for
Affordable Healthcare, Inc.
Corporate Creations Network, Inc.
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St. Louis, Missouri 63117
Certified Mail # 7007 3020 0003 1572 4711

American Trade Association
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and

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Certified Mail # 70073020 0003 1572 4735

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Certified Mail # 7007 30200003 15724742

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and

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and

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and

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Colin Youell

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Kimberly Sanders