

STATE OF MISSOURI  
DEPARTMENT OF INSURANCE

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MEMORANDUM


MISSOURI

BULLETIN NO. 92-10

November 1, 1992

TO: All Licensed Disability Insurers and  
Workers' Compensation Insurers

FROM: Lewis E. Melahn, Director  
State of Missouri



RE: ~~International Association of Entrepreneurs of America, Inc.~~  
(IAEA)  
United Labor Council, Local No. 615  
The Financial Consultants Guild of America  
Contract Services Union, Local 211

I am asking that each Missouri licensed disability insurer and workers' compensation insurer advise their Missouri licensed agents and brokers to be wary of any disability or workers' compensation program being offered by any persons utilizing the names listed above, or an address of 1520 W. Airport Freeway, Suite 102, Irving, Texas 75062.

These organizations appear to be engaged in promoting supposedly ERISA exempt disability (accident and health) plans, occupational illness and injury plans and ERISA exempt workers' compensation insurance. While it is clearly possible to have ERISA exempt, collectively-bargained employee welfare benefit plans, there is nothing in the law of the United States or of any individual state which exempts any plan from the workers' compensation insurance laws.

Further, I would like to point out that none of these entities have registered with this Department as a Third Party Administrator, (TPA), or as a Self-Insured plan authorized by Section 287.280. No agent or representative of any of the above named entities have been able to provide a Certificate of Insurance showing a licensed carrier in the State of Missouri as the underwriter of this plan. Therefore, the above named entities

may be engaged in the unauthorized business of insurance in this state. Should your agents or customers be approached with proposals such as the one described, they should be aware that these entities are operating illegally and if the agent or broker sells this product they would be held responsible for any and all claims incurred.

Please transmit a copy of this Bulletin to all of your Missouri agents and brokers as soon as possible. Please provide a copy of your transmittal to: Missouri Department of Insurance

Attn. Cynthia M Amann  
Special Investigations Unit  
P.O. Box 690  
Jefferson City, MO 65102-0690

Thank you for your cooperation.

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LEWIS E MELAHN, DIRECTOR  
DEPARTMENT OF INSURANCE  
STATE OF MISSOURI

**RESCINDED AND INOPERATIVE**