

FINAL ORDER TO CEASE AND DESIST

1. The Commissioner of the Office of Financial and Insurance Regulation pursuant to the authority granted under the Michigan Insurance Code (Code), MCL 500.100 *et seq.*, initiated an investigation of Respondents.
2. On the basis of that investigation, the Chief Deputy Commissioner concluded that Respondents violated the Code by engaging in violations of MCL 500.1208a and/or MCL 500.1201a.
3. On March 23, 2012, the Chief Deputy Commissioner issued an Order to Cease and Desist (Order) pursuant to Section 251 of the Code, MCL 500.251. Said Order, incorporated herein by reference, advised Respondents that they could contest the Order by requesting a hearing within 30 days after the Order was mailed.
4. On or about March 27, 2012, the Order was mailed to Respondents' last known addresses.
5. Respondents failed to request a hearing on the Order as provided in Section 251 of the Code, MCL 500.251.

NOW, THEREFORE, the Chief Deputy Commissioner finds and orders:

I. STATEMENT OF FACTS

1. American Medical and Life Insurance Company (AMLI) is an insurer duly authorized, by a subsisting certificate of authority issued by OFIR, to transact insurance in the state of Michigan, effective July 8, 2008. AMLI offered limited medical benefit products in the state of Michigan. AMLI's current address is 59 Maiden Lane, Suite 510, New York, NY 10038.
2. AMLI subsequently entered into agreements (General Agent Administrative Services Agreements) with entities it refers to as "Program Managers." AMLI asserts that these entities and/or individuals were directly involved in the marketing and sales of AMLI products for a number of associations and their members. These entities and/or individuals included: Group Health Plan Administrators, Inc. (GPA), Louis DeLuca (DeLuca), Scott DiTrapani, Gary Karns (Karns) and Oxonia Insurance Agency (Oxonia).
3. GPA is a licensed, non-resident insurance producer in the state of Michigan, located at 22 Carlisle Drive, Old Brookland, New York 11545. GPA has never held an appointment with AMLI to sell insurance products on behalf of AMLI. GPA was associated with the marketing of AMLI's products to members of the National Congress of Employers (NCE).

4. DeLuca was never licensed in Michigan or appointed by AMLI. DeLuca was associated with the association known as the Association of Independent Managers (AIM, AIM Health Plans). DeLuca has had regulatory actions taken against him in several states including New York, Texas, California, Utah, and Nebraska, which included the issuance of Cease and Desist orders.
5. Karns is a licensed insurance producer in Michigan and is an appointed agent of AMLI. Karns was associated with the AIM, AIM Health Plans. Karns was suspended for compliance in his home state of Ohio. He has been the subject of regulatory actions in Oklahoma, Virginia and Utah. Utah revoked Karns's insurance producer license.
6. Oxonia is a Michigan licensed, non-resident producer, located at 8487 W. Commerical Blvd., Tamarac, Florida 33351. Oxonia has never held an appointment with AMLI to sell its products.
7. AIM is located at 20 Madison Avenue, Valhalla, New York 10595. At all relevant times, AIM was managed and operated by DeLuca and Karns. AIM is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
8. AIM, AIM Healthplans, Inc., DeLuca, and Karns packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to the Association for Independent Managers, under the name of AIM Healthplans.
9. Adroit Mutual Benefits LLC (ADMU), whose last known address is 400 Chisholm Place, Suite 106, Plano, Texas 75075, maintains a website at: www.admubenefits.com. ADMU is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
10. ADMU packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to the Association for Independent Managers (AFIM fka AIM), under the name of Access Plans.
11. FCHCN Insurance Agency, Inc., dba Hife-Health Insurance For Everyone (FirstChoice Healthcare or FirstChoice), located at 333 W. Commercial Blvd., Suite 103, Fort Lauderdale, Florida 33309, is a Michigan licensed, non-resident producer. However, FirstChoice is not appointed by AMLI to sell its insurance products.
12. FirstChoice packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to NCE, under the name of NCE Advantage.
13. Scott DiTripani and GPA packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to NCE, under the name of NCE Advantage.

14. The National Insurance Network, Inc. (NIN) is a Michigan licensed, non-resident producer located at 7257 Bee Ridge road, Sarasota, Florida 34241. NIN, is not appointed by AMLI to sell its insurance products.
15. NIN packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to NCE, under the name of NCE Advantage.
16. The Insurance Brokers Network (IBN) is located at 1300 Virginia Drive, Suite 315, Fort Washington, PA 19034. IBN is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
17. IBN packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to NCE, under the names of NCE Advantage and CoreValue Medical Plans.
18. Cinergy Health Inc. 58092, dba Cinergy Health & Life, Inc. (Cinergy), is a Michigan licensed, non-resident producer located at 10251 W. Oakland Park Blvd., Sunrise, Florida 33351. Cinergy is not appointed by AMLI to sell its insurance products.
19. Cinergy packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to NCE, under the name of NCE Advantage.
20. PJP Health Agency, Inc. (PJP) is a Michigan licensed, non-resident producer located at 3 Huntington Quad, Suite 400N, Melville, New York 11747. PJP is not appointed by AMLI to sell its insurance products
21. PJP packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to NCE, under the name of NCE Advantage.
22. All Aboard Benefits is located at 6162 E. Mockingbird Lane, Suite 104, Dallas, Texas 75214. All Aboard Benefits is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
23. All Aboard Benefits packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to NCE, under the name of All Aboard Benefits.
24. Homeland Healthcare Agency, Inc. (Homeland), aka The Adroit Group, Inc., is a Michigan licensed, non-resident producer located at 825 Market Street, Suite 300, Allen, Texas 75013. Homeland is not appointed by AMLI to sell its insurance products.
25. Homeland packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to the North American Consumer Alliance (NACA) and

the Affiliated Workers Association (AWA), under the name of Homeland HealthCare, Essential Access Plans and AWA Gap Plans.

26. Command Financial Group (Command Financial) is located at 1735 Buford Highway, Suites 215 and 202, Cummings, Georgia 30041. Command Financial is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
27. Oxonia and Command Financial packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to the Consumer Health Choice Association (CHCA), under the name of SureHealth.
28. Oxonia also packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to CHCA, under the name of Intelicare Health.
29. Bay Insurance Marketing, located at 615 N. Jasmine Ave., #B, Tarpon Springs, Florida 34689, is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
30. MedPath Direct, located at 101 Pilgrim Village Drive, Building 101, Suite 200, Cummings, Georgia, is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
31. Bay Insurance Marketing, Command Financial, MedPath Direct and MedPathAgents, Inc., packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to CHCA, under the name of MedPath and Affordable Healthcare Plans.
32. Oxonia and Bay Insurance Marketing packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to the Consumer Assistance Services Association (CASA), under the name of Command Health Plans.
33. Direct Medical Network Solutions, Inc. (Direct Medical), located in Southlake, Texas, is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
34. Lifeguard Benefit Services, Inc. (Lifeguard), located at 4929 W. Royal Lane, Irving, Texas 75063-2746, is neither licensed in Michigan nor appointed by AMLI to sell its insurance products. Lifeguard is owned by The Amacore Group, Inc. (Amacore). Amacore is located at 485 N. Keller Road, Suite 450, Maitland, Florida 32751. Amacore is licensed in Michigan, but not appointed by AMLI to sell its insurance products.
35. Direct Medical, Command Financial, Lifeguard and Amacor, packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to CASA, under the name of DirectMed.

36. Premier Health Plans, Inc. (Premier) is a Michigan licensed, non-resident producer located at 2950 West Cypress Creed Road, Suite 203, Fort Lauderdale, Florida 33309. Premier is not appointed by AMLI to sell its insurance products.
37. Axis Financial Corporation (Axis Financial), located at 262 East Main Street, Rockaway, New Jersey 07866, is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
38. Premier and Axis Financial packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to CASA, under the name of Premier Health Plans.
39. Insurance Marketing Concepts, Inc. (Insurance Marketing), located at 4782 W. Commercial Blvd., Tamarac, Florida 33319, is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
40. IBN, Insurance Marketing, and Oxonia packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to CASA, under the name of Emed Options.
41. CorpSavers Insurance Agency, Inc. (CorpSavers) and Timothy Patrick Siewert are Michigan licensed, non-resident producers. CorpSavers is located at 6470 E. Johns Crossing, Suite 170, Duluth, Georgia 30097. Neither CorpSavers nor Tim Siewert are appointed by AMLI to sell its insurance products.
42. The Benefit Solutions Group (Benefit Solutions), located at 3948 Legacy Drive, Suite 106, Box 379, Plano, Texas 75023-8300, is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
43. The National Better Living Association, Inc. (NBLA), located at 5425 Peachtree Parkway, Norcross, Georgia 30092, is neither licensed in Michigan nor appointed by AMLI to sell its insurance products.
44. CorpSavers, Benefit Solutions, Timothy Patrick Siewert, and the NBLA packaged and marketed a group limited medical benefit health insurance plan in Michigan, issued by AMLI to the NBLA, under the name of NBLA Plans.
45. Based on the foregoing, AMLI allowed unappointed agencies and other unlicensed, unappointed marketing entities to sell its product in the state of Michigan in violation of the Code.
46. Based on the foregoing, the above named Respondents have violated the Code by marketing and selling AMLI's insurance products prior to obtaining an appointment

from AMLI and/or receiving a license pursuant to the Code to engage in such activity.
See MCL 500.1208a and MCL 500.1201a.

NOW, THEREFORE, the Chief Deputy Commissioner finds it to be in the public interest to issue this Final Order, and IT IS HEREBY ORDERED THAT:

1. Respondents shall CEASE AND DESIST from selling, soliciting or negotiating insurance in Michigan for any line of insurance unless the person is licensed for that qualification in accordance with the Code.
2. Respondents shall CEASE AND DESIST from selling, soliciting or negotiating insurance products in this state on behalf of an insurer without an appointment by the insurer.

IT IS SO ORDERED:

By: 
Annette E. Flood
Chief Deputy Commissioner
Office of Financial and Insurance Regulation