STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of HEALTH PLAN INTERMEDIARIES HOLDINGS, LLC, dba Health Insurance Innovations; AMERICAN SERVICE INSURANCE AGENCY LLC; HEALTHINSURANCE.COM, LLC; HEALTHPOCKET, INC.; TOGETHERHEALTH INSURANCE, LLC; TOTAL INSURANCE BROKERS, LLC; and BENEFYTT TECHNOLOGIES, INC., Respondents.	Case No. INS-23-0068 FINAL ORDERS TO CEASE AND DESIST, DENY LICENSE APPLICATION, REVOKE LICENSES, AND ASSESS CIVIL PENALTIES, AND CONSENT TO ENTRY OF ORDERS

The Division of Financial Regulation (the "Division"), acting on behalf of the Director of the Department of Consumer and Business Services for the State of Oregon (the "Director"), conducted an investigation into Health Plan Intermediaries Holdings, LLC, dba Health Insurance Innovations, American Service Insurance Agency LLC, Healthinsurance.com, LLC, Healthpocket, Inc., TogetherHealth Insurance, LLC, and Total Insurance Brokers, LLC, (collectively, the "Licensees"). Together, the Licensees are all, or were during the period relevant to these Orders, affiliated with and/or subsidiaries of Benefytt Technologies, Inc. ("Benefytt") (which subsequently upon emergence from bankruptcy, became Benefytt Technologies, LLC) (collectively, Benefytt and Licensees will be referred to as the "Respondents"). The Division determined that Respondents violated certain provisions of Oregon Revised Statutes ("ORS") chapters 731, 732, 733, 734, 735, 737, 742, 743, 743A, 744, 746, 748, and 750 ("Insurance Code").

Now, therefore, as evidenced by the signature subscribed herein, Respondents hereby CONSENT to the entry of these Orders.

The Director makes the following Findings of Fact, Conclusions of Law, and Orders.

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FINDINGS OF FACT

The Director FINDS that:

1. Health Plan Intermediaries Holdings, LLC, dba Health Insurance Innovations ("HPIH") is a Delaware limited liability company whose principal place of business is located at 3450 Buschwood Park Drive, Suite 200, Tampa, FL 33618 (the "Tampa Office"). HPIH is a wholly owned subsidiary of Benefytt, a Delaware limited liability company whose principal place of business is also located at the Tampa Office. HPIH currently possesses Oregon Insurance Producer License No. 100175121, NPN 16714695 (the "HPIH Producer License"). In or around July 2023, HPIH submitted an application with the Division to obtain an Oregon third party administrator license (the "HPIH Application").

2. American Service Insurance Agency LLC ("ASIA") was, during the period relevant to these orders, a Texas limited liability company whose principal place of business is located at 100 Chambers Cir., Ste. 1004, Waxahachie, TX 75165. During the period relevant to these Orders, ASIA was a wholly-owned subsidiary of HPIH. ASIA currently possesses Oregon Insurance Producer License No. 100207896, NPN 16460754 (the "ASIA Producer License").

3. Healthinsurance.com, LLC ("Healthinsurance.com") is a Delaware limited liability company. During the period relevant to these Orders, Healthinsurance.com was a wholly-owned subsidiary of HPIH. Healthinsurance.com currently possesses Oregon Insurance Producer License No. 3000844794, NPN 39442666 (the "Healthinsurance.com License").

4. HealthPocket, Inc. ("HealthPocket") is a Delaware corporation whose principal place of business is located at 444 Castro Street, Suite 700, Mountain View, CA 94041. HealthPocket is a wholly owned subsidiary of Health Insurance Innovations Holdings, Inc., which is itself a wholly owned subsidiary of HPIH. Health Insurance Innovations Holdings, Inc.is a Delaware corporation whose principal place of business is located at the Tampa

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Office. HealthPocket currently possesses Oregon Insurance Producer License No. 100289020, NPN 17932607 (the "HealthPocket License").

5. TogetherHealth Insurance, LLC ("TogetherHealth") is a Delaware limited liability company whose principal place of business is located at the Tampa Office. TogetherHealth is a wholly owned subsidiary of HPIH. TogetherHealth currently possesses Oregon Insurance Producer License No. 3000478864, NPN 18763179 (the "TogetherHealth License").

6. Total Insurance Brokers, LLC ("Total") is a Delaware limited liability company whose principal place of business is located at the Tampa Office. Total is a wholly owned subsidiary of HPIH. Total currently possesses Oregon Insurance Producer License No. 3000550353, NPN 19162388 (the "Total License").

7. In other words, during the period relevant to these Orders, HPIH was the sole member of every single one of the other Licensees except for HealthPocket, for which HPIH was the sole shareholder. Ultimately, then, during the period relevant to these Orders, all of the Licensees were controlled by the same ownership group that owned and controlled HPIH, which in turn was controlled by Benefytt. All of the Licensees subsequently underwent bankruptcy or assignments for the benefit of creditors and continue to exist solely to satisfy creditor obligations before winding up their affairs. None plan to engage in any new business.

8. Over the past ten years, HPIH has been the subject of various enforcement actions taken by numerous states and federal agencies, including but not limited to the following:

- On November 14, 2014, HPIH stipulated to a consent order with the State of Florida, where HPIH's principal place of business is located, related to its engagement in in the business of insurance without a license, and agreed to pay an administrative penalty of $500.00.

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- In or about March 2015, the State of Michigan issued an administrative action against HPIH for failure to register a trade name.
- On June 10, 2015, HPIH stipulated to a consent order with the State of Washington related to its engagement in the business of insurance without registering a trade name, and agreed to pay an administrative penalty of $250.00.
- In or about November 2015, the State of Arkansas issued an administrative action against HPIH for use of an unregistered trade name.
- On November 16, 2015, HPIH stipulated to a consent order with the State of Minnesota related to its failure to register its assumed business names, and agreed to pay a civil penalty of $1,000.00.
- On March 28, 2016, the State of Arkansas issued a cease and desist order and order to show cause against HPIH related to unauthorized insurance transactions, unlicensed activity, and intentionally misrepresenting the terms of an actual or proposed insurance contract or application for insurance.
- On November 18, 2016, the State of Oklahoma issued a conditional order related to HPIH's failure to timely renew its third-party administrator license and assessed a $500.00 fine.
- On May 5, 2017, the State of South Dakota issued a consent order alleging that HPIH sold policies through unappointed producers and accepted commissions from an insurer without an appointment. The order assessed a penalty of $55,000.00, to which HPIH consented.
- On July 11, 2017, the State of Nevada issued an administrative fine of $500.00 against HPIH, to which HPIH consented, for its failure to timely file an annual report as the holder of a certificate of registration as an administrator.
- On February 14, 2018 HPIH stipulated to a consent order with the State of

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Florida, where HPIH's principal place of business is located, related to its engagement in in the business of insurance without a license, and agreed to pay an administrative penalty of $140,000.00. This was the second time in less than four years that HPIH had signed a consent order with the state where its principal place of business is located concerning its engagement in the business of insurance without a license.

- On or about December 12, 2018 HPIH entered into a multi-state regulatory settlement agreement with 43 separate states, including the State of Florida, where HPIH's principal place of business is located. Though HPIH denied any wrongdoing under the agreement, it nonetheless agreed to pay a $3.4 million fine related to its alleged violations of the participating states' insurance laws.
- On or about July 29, 2019 HPIH entered into a stipulation with the State of New York in which it admitted that it had violated New York insurance law by acting as an insurance agent in the state without a sublicense. The order assessed a penalty of $1,000.00, to which HPIH consented.
- On August 19, 2019 the State of Louisiana issued a notice of fine against HPIH for its failure to timely file a third party administrator annual report, and assessed a $500 fine for the violation.
- On or about January 13, 2020 HPIH entered into a voluntary settlement agreement with the State of North Carolina in which HPIH admitted that it failed to report the final disposition of the aforementioned multi-state regulatory settlement agreement in the timeframe specified by North Carolina law, and agreed to pay a monetary penalty of $250.00.
- On or about January 2, 2020 HPIH stipulated to a second consent order with the State of Washington, this time related to its alleged sale of unauthorized discount medical insurance plans, and selling insurance plans on behalf of

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insurance carriers without being appointed and through insurance producers not affiliated with HPIH. In consenting to the order, HPIH also agreed to pay a $1,500,000.00 fine.

- On or about October 16, 2020 HPIH entered into a voluntary settlement agreement with the State of North Carolina in which HPIH admitted, once again, that it failed to timely report the final disposition of the fine issued by the State of Louisiana on August 19, 2019 in the timeframe specified by North Carolina law, and once again agreed to pay a monetary penalty of $250.00.
- On or about July 27, 2021, HPIH consented to the entry of a consent judgment with the State of Massachusetts related to HPIH's alleged various unfair or deceptive marketing of health insurance plans and non-insurance discount plans. The judgment resulted in, *inter alia*, a one year prohibition against HPIH and all of its "subsidiaries, divisions, affiliates, [etc.]" from selling any insurance policy or non-insurance health plan, as well as a civil penalty of $110,000.00.
- On or about July 16, 2021, HPIH stipulated to a consent order with the State of Nebraska related to HPIH and its affiliates (including co-respondents Total, Healthinsurance.com, and HealthPocket) for creating consumer confusion by advertising insurance plans that they were not authorized to sell. The order assessed a penalty of $25,000.00, to which HPIH consented.
- On or about August 9, 2021, HPIH entered into a settlement agreement with the State of California, which was approved by the California Department of Insurance on August 18, 2021, in which it was alleged that HPIH made misrepresentations of policy coverage to consumers, transacted hospital indemnity policies in a manner not in compliance with the California Insurance Code, and charged fees to consumer for transacting insurance policies or

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packages. Though HPIH denied these allegations, it nonetheless consented to paying a civil penalty of $2,000,000.00 related to the allegations.

- On or about March 27, 2022 HPIH and HealthPocket agreed to a stipulated order with the Federal Trade Commission ("FTC"), and a money judgment of $100,000,000.00 in favor of the FTC, related to their alleged participation in deceptive, unfair, and abusive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, the FTC's Telemarketing Sales rule, 16 C.F.R. Part 310, as amended, and Section 4 of the Restore Online Shoppers' Confidence Act, 15 U.S.C. § 8403, in connection with the advertising, marketing, telemarketing, promoting, offering for sale, or sale of association memberships and health related products, including short-term medical plans, limited benefit plans, and medical discount plans.
- On April 25, 2022 the State of Louisiana issued, once again, a notice of fine against HPIH for its failure to timely file a third party administrator annual report, and this time assessed a $750.00 fine against HPIH for the violation.
- On or about July 20, 2022, Benefytt, which is essentially the parent company of all of the other Respondents, consented to the entry of an order issued by Securities and Exchange Commission ("SEC") related to a series of false and misleading statements made by Benefytt's CEO to the company's investors. Additionally, the SEC found that Benefytt's own compliance department had documented more than 24,000 consumer complaints alleging that insurance agents made misrepresentations to consumers in order to sell products, failed to cancel plans when consumers requested, and charged consumers for products whose purchase they had not authorized. Though HPIH denied the SEC's allegations, it nonetheless consented to paying a civil penalty of $11,000,000.00 related to the allegations.

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9. The actions and events underlying the above enforcement actions occurred prior to August 2020.[1]

10. In evaluating the HPIH Application, a compliance specialist with the Division conducted a thorough financial analysis of HPIH based upon the financial information that HPIH provided (the "Financial Analysis"). The Financial Analysis evaluated the years 2021 and 2022, and considered ten separate factors developed by the Division to determine financial soundness. Those factors include the following: asset to liability ratio, total liquidity, intangible assets to tangible assets ratio, liability to equity ratio, net income or loss, death ratio, income to equity ratio, change in equity over the prior year, profit margin, and income trend over multiple periods. Under the Financial Analysis, HPIH failed five of the ten factors in each of the two years analyzed.

On May 23, 2023, Benefytt, all of the Licensees, and several other affiliates or subsidiaries of Benefytt filed for protection under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (the "Bankruptcy"). All of those bankruptcy cases were consolidated for procedural purposes only into a single case, in which Benefytt is the lead debtor in Case No. 23-90566. Though the Bankruptcy case remains open, an order confirming Respondents' Chapter 11 Plan was confirmed in the Bankruptcy on August 30, 2023. Respondents have also informed the Division that they have ceased all business operations in Oregon that would require any insurance licenses.

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[1] In addition to the regulatory enforcement actions taken against Respondents, several of them were named in multiple class action lawsuits, including: *Elizabeth E. Belin, et al. v. Health Insurance Innovations, Inc., et al.*, which was filed June 7, 2019 in the U.S. District Court for the Southern District of Florida as Case No. 19-cv-61430; *Griffin, et al. v. Benefytt Technologies, Inc., et al.*, which was filed November 20, 2020 in the U.S. District Court for the Southern District of Florida as Case No. 20-cv-62371; *Bilek, et al. v. National Congress of Employers, Inc., et al.,* which was filed April 30, 2018 in the U.S. District Court for the Northern District of Illinois as Case No. 18-cv-03083; *Hossfeld, et al. v. American Financial Security Life Insurance Company, et al.,* which was filed March 6, 2019 in the U.S. District Court for the Northern District of Illinois as Case No. 19-cv-60597; *Moore v. Am. Serv. Ins. Agency LLC*, which was filed Oct. 19, 2020 in the U.S. District Court for the Northern District of Illinois as Case No. 20-cv-06206; *Newman v. Benefytt Techs., Inc.*, which was filed September 8, 2022 in the U.S. District Court for the Northern District of Illinois as Case No. No. 1:22-cv-04845; and *Pinn v. TogetherHealth Insurance, LLC,* which was filed February 3, 2023 in the U.S. District Court for the Northern District of Texas as Case No. 3:23-cv-00251.

11. Between June 1, 2023 and August 1, 2024, HPIH continued to service, as an unlicensed third party administrator, 184 insurance policies, which were originally sold from 2013 – 2023. As of August 1, 2024, HPIH has transferred all policies for which it was providing third party administrator services to Premier Health Solutions LLC, which holds Oregon Third Party Administrator License No. 100282214.

CONCLUSIONS OF LAW

The Director CONCLUDES that

12. Pursuant to ORS 744.710(1) the Director shall not issue a third party administrator license if the Director determines that the applicant, "or any individual responsible for the conduct of affairs of the third party administrator, as required to be set forth in the application for the license, is not competent, trustworthy, financially responsible or of good personal and business reputation."

13. Pursuant to ORS 744.074(1)(h) the Director may place a licensee on probation or suspend, revoke or refuse to or refuse to issue or renew an insurance producer license if the licensee uses fraudulent, coercive or dishonest practices, or demonstrates incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere.

14. As demonstrated by the many instances of regulatory enforcement actions detailed in paragraph 8 above, which resulted in millions of dollars in civil penalties, HPIH has proven over the course of a decade that it is not competent or trustworthy in maintaining compliance with state or federal laws regulating the business of insurance. As such, it should not be granted a third party administrator license, and the HPIH License ought to be revoked.

15. Additionally, the Division's internal financial analysis of HPIH shows that it is not financially responsible enough to be granted a third party administrator license. Indeed,

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none of the Respondents are financially responsible enough to maintain insurance producer licenses.

16. Furthermore, the many allegations against Respondents in the various enforcement actions and lawsuits discussed above have damaged the trustworthiness and business reputations of Respondents, and provide the Director with ample reason to revoke the HPIH License, the ASIA Producer License, the Healthinsurance.com License, the HealthPocket License, the TogetherHealth License, and the Total License.

17. Pursuant to ORS 744.702(1), a person shall not transact business or purport or offer to transact business as a third party administrator without holding a license issued by the Director.

18. By conducting third party administrator services on at least 184 existing insurance policies, HPIH and its parent company, Benefytt, violated ORS 744.702(1).

19. Pursuant to ORS 731.252(1), whenever the Director has reason to believe that any person has been engaged or is engaging or is about to engage in any violation of the Insurance Code, the Director may issue an order, directed to such person, to discontinue or desist from such violation or threatened violation.

20. Because the Director has reason to believe that Respondents have violated ORS 744.710, 744.074(h), and 744.702(1), the Director may issue an order directed to Respondents to discontinue or desist from those violations under ORS 731.252(1).

21. Pursuant to ORS 731.988(1), the Director may impose a civil penalty of up to $10,000 per violation upon an individual insurance producer who violates the Insurance Code.

RESPONDENT REPRESENTATIONS

22. Health Plan Intermediaries Holdings, LLC, Healthpocket, Inc., TogetherHealth Insurance, LLC, Total Insurance Brokers, LLC, Benefytt Technologies, Inc., the ASIA Assignee (for itself and, pursuant to a power of attorney, on behalf of Respondent ASIA),

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and the Healthinsurance.com Assignee (for itself and, pursuant to a power of attorney, on behalf of Respondent Healthinsurance.com), represent that all of the entities named as Respondents herein that also hold licenses with DFR subsequently underwent bankruptcy or assignments for the benefit of creditors and continue to exist solely to satisfy creditor obligations before winding up their affairs. None of the Respondents or licensees named herein plan to engage in any new business.

23. The ASIA Assignee, for itself and, pursuant to a power of attorney, on behalf of Respondent ASIA, represents that after a corporate reorganization associated with its emergence from bankruptcy on September 11, 2023, ASIA became, and is now, a subsidiary of Blue Lantern Health, LLC, a Delaware Limited Liability Company ("Blue Lantern"). ASIA no longer has any employees or officers. A separate entity, American Services Insurance Agency (assignment for the benefit of creditors), LLC (the "ASIA Assignee"), was formed under Delaware law for the purpose of administering an Assignment for the Benefit of Creditors (ABC) to wind down ASIA's business, dispose of its assets, and settle outstanding claims and debts, with the authority to resolve claims and enter into settlements on ASIA's behalf.

24. The Healthinsurance.com Assignee, for itself and, pursuant to a power of attorney, on behalf of Respondent Healthinsurance.com, represents that after a corporate reorganization associated with its emergence from bankruptcy on September 11, 2023, Healthinsurance.com became, and is now, a wholly-owned subsidiary of Blue Lantern. Healthinsurance.com no longer has any employees or officers. A separate entity, Healthinsurance.com (assignment for the benefit of creditors), LLC (the "Healthinsurance.com Assignee"; together with the ASIA Assignee, the "Assignees", and each, an "Assignee"), was formed under Delaware law for the purpose of administering an Assignment for the Benefit of Creditors (ABC) to wind down Healthinsurance.com's business, dispose of its assets, and settle outstanding claims and debts, with the authority

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to resolve claims and enter into settlements on behalf of Healthinsurance.com. Additionally, the right to use the domain name "Healthinsurance.com" has been transferred to an unrelated third party.

ORDERS

The Director issues the following ORDERS:

25. Pursuant to ORS 731.252(1), the Director hereby ORDERS Respondents to CEASE AND DESIST from violating any provision of the Insurance Code, or any administrative rule adopted by the Director under those statutes.

26. Pursuant to ORS 744.710(1), the Director hereby ORDERS that HPIH's Application for a third party administrator license is DENIED.

27. Pursuant to ORS 744.074(1)(h), the Director hereby ORDERS the HPIH License, the ASIA Producer License, the Healthinsurance.com License, the HealthPocket License, the TogetherHealth License, and the Total License are REVOKED.

28. Respondents agree that Respondents and their affiliates will not apply or reapply for an insurance producer or third party administrator license in Oregon.

29. As authorized by ORS 731.988(1), the Director hereby ORDERS that both Benefytt and HPIH be subject, jointly and severally, to a CIVIL PENALTY of $50,000 for the above described violations of ORS 744.702(1).

30. The Director SUSPENDS all $50,000 of the CIVIL PENALTY assessed in paragraph 33, provided that Respondents do not violate the terms of this Consent Order or violate any further provisions of the Oregon Insurance Code.

31. If Respondents satisfy the above conditions for a period of three years after the effective date of this Order, the Director shall waive the $50,000 suspended civil penalties. If Respondents fail to satisfy the above conditions during the three-year period following the date of this Order or has made any misrepresentations in this Order, the suspended portion of the civil penalties will become immediately due and owing, and DFR reserves

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the right to assess additional civil penalties dependent upon the severity of Respondents' failures and/or misrepresentations.

32. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that provision, entry of this Order does not limit or prevent further remedies available to the Director under Oregon law to enforce this Order or take action for violations of this Order or of the Insurance Code not covered by this Order.

33. This Order is binding upon Respondents and their respective successors and assigns.

IT IS SO ORDERED.

Dated this 9th day of January ,2025.

Andrew R. Stolfi, Director
Department of Consumer and Business Services

/s/ Dorothy Bean
Dorothy Bean, Chief of Enforcement
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CONSENT TO ENTRY OF ORDER

I, Jon David Pedersen, state that I am an officer of Health Plan Intermediaries Holdings LLC dba Health Insurance Innovations and am authorized to act on its behalf. I have read the foregoing Order and know and fully understand the contents hereof. I have been advised of Respondent's right to a hearing and right to be represented by counsel in this matter. Respondent voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. Respondent understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Insurance Code or with the terms and conditions stated herein.

Respondent further assures the Director that neither Health Plan Intermediaries Holdings LLC dba Health Insurance Innovations nor its officers, directors, employees, or agents will effect insurance services in Oregon unless such activities are in full compliance with the Insurance Code. Respondent understands that this Consent Order is a public document.

Signature: /s/ *Jon David Pedersen*

Position Held: President

State of Virginia

County of Fairfax

Signed or attested before me on this 7th day of January , 2025 by Jon David Pedersen .

/s/ Tasnief Haque
Notary Public

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CONSENT TO ENTRY OF ORDER

I, Michael Maidy, state that I am the manager of American Services Insurance Agency (assignment for the benefit of creditors) LLC ("ASIA-ABC") and am authorized to act on its behalf. ASIA-ABC has a power of attorney of respondent American Service Insurance Agency LLC ("ASIA") and therefore is authorized to consent to and execute this FINAL ORDERS TO CEASE AND DESIST, DENY LICENSE APPLICATION, REVOKE LICENSES, AND ASSESS CIVIL PENALTIES, AND CONSENT TO ENTRY OF ORDERS (this "ORDER") on behalf of respondent ASIA and to otherwise act for and on behalf of Respondent ASIA.

ASIA-ABC, for itself and, pursuant to a power of attorney, on behalf of Respondent ASIA: (1) has read the foregoing Order and knows and fully understands the contents hereof; (2) has been advised of its right to a hearing and right to be represented by counsel in this matter; (3) voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order; (4) understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Insurance Code or with the terms and conditions stated herein.

ASIA-ABC, for itself and, pursuant to a power of attorney, on behalf of Respondent ASIA, further agrees and assures the Director that neither Respondent ASIA nor its officers, directors, employees, or agents will effect insurance services in Oregon unless such activities are in full compliance with the Insurance Code. ASIA-ABC, for itself and, pursuant to a power of attorney, on behalf of Respondent ASIA, understands that this Consent Order is a public document.

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This ORDER is executed by respondent ASIA as of the date first set forth below:

AMERICAN SERVICE INSURANCE AGENCY LLC, a Texas limited liability company

By: AMERICAN SERVICES INSURANCE AGENCY (ASSIGNMENT FOR THE BENEFIT OF CREDITORS) LLC, a Delaware limited liability company, its Authorized Agent

By: */s/ Michael Maidy*

Its: Manager

State of California

County of Santa Clara

Signed or attested before me on this 7th day of January, 2025 by Michael Maidy.

Carissa Anne Kozacek
Notary Public

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CONSENT TO ENTRY OF ORDER

I, Michael Maidy, state that I am the manager of Healthinsurance.com (assignment for the benefit of creditors), LLC ("HI.comABC") and am authorized to act on its behalf. HI.comABC has a power of attorney of respondent Healthinsurance.com LLC ("Healthinsurance.com") and therefore is authorized to consent to and execute this FINAL ORDERS TO CEASE AND DESIST, DENY LICENSE APPLICATION, REVOKE LICENSES, AND ASSESS CIVIL PENALTIES, AND CONSENT TO ENTRY OF ORDERS (this "ORDER") on behalf of respondent Healthinsurance.com and to otherwise act for and on behalf of Respondent Healthinsurance.com.

HI.comABC, for itself and, pursuant to a power of attorney, on behalf of Respondent Healthinsurance.com: (1) has read the foregoing Order and know and fully understand the contents hereof; (2) has been advised of its right to a hearing and right to be represented by counsel in this matter; (3) voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order; and (4) understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Insurance Code or with the terms and conditions stated herein.

HI.comABC, for itself and, pursuant to a power of attorney, on behalf of Respondent Healthinsurance.com, further agrees and assures the Director that neither HI.comABC nor its officers, directors, employees, or agents will effect insurance services in Oregon unless such activities are in full compliance with the Insurance Code. HI.comABC, for itself and, pursuant to a power of attorney, on behalf of Respondent Healthinsurance.com understands that this Consent Order is a public document.

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This ORDER is executed by respondent Healthinsurance.com LLC as of the date first set forth below:

HEALTHINSURANCE.COM LLC, a Delaware limited liability company

By: HEALTHINSURANCE.COM (ASSIGNMENT FOR THE BENEFIT OF CREDITORS), LLC, a Delaware limited liability company, its Authorized Agent

By: */s/ Michael Maidy*

Its: _Manager_

State of California

County of Santa Clara

Signed or attested before me on this 7th day of January, 2025 by Michael Maidy.

Carissa Anne Kozacek
Notary Public

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CONSENT TO ENTRY OF ORDER

I, Jon David Pedersen, state that I am an officer of Healthpocket, Inc. and am authorized to act on its behalf. I have read the foregoing Order and know and fully understand the contents hereof. I have been advised of Respondent's right to a hearing and right to be represented by counsel in this matter. Respondent voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. Respondent understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Insurance Code or with the terms and conditions stated herein.

Respondent further assures the Director that neither Healthpocket, Inc. nor its officers, directors, employees, or agents will effect insurance services in Oregon unless such activities are in full compliance with the Insurance Code. Respondent understands that this Consent Order is a public document.

Signature: /s/ *Jon David Pedersen*

Position Held: President

State of Virginia

County of Fairfax

Signed or attested before me on this 7th day of January , 2025 by Jon David Pedersen .

/s/ Tasnief Haque
Notary Public

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Salem, OR 97301-3881
Telephone: (503) 378-4387

CONSENT TO ENTRY OF ORDER

I, Jon David Pedersen, state that I am an officer of TogetherHealth Insurance, LLC and am authorized to act on its behalf. I have read the foregoing Order and know and fully understand the contents hereof. I have been advised of Respondent's right to a hearing and right to be represented by counsel in this matter. Respondent voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. Respondent understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Insurance Code or with the terms and conditions stated herein.

Respondent further assures the Director that neither TogetherHealth Insurance, LLC nor its officers, directors, employees, or agents will effect insurance services in Oregon unless such activities are in full compliance with the Insurance Code. Respondent understands that this Consent Order is a public document.

Signature: /s/ *Jon David Pedersen*

Position Held: President

State of Virginia

County of Fairfax

Signed or attested before me on this 7th day of January , 2025 by Jon David Pedersen .

/s/ Tasnief Haque
Notary Public

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

CONSENT TO ENTRY OF ORDER

I, Jon David Pedersen, state that I am an officer of Total Insurance Brokers, LLC and am authorized to act on its behalf. I have read the foregoing Order and know and fully understand the contents hereof. I have been advised of Respondent's right to a hearing and right to be represented by counsel in this matter. Respondent voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. Respondent understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Insurance Code or with the terms and conditions stated herein.

Respondent further assures the Director that neither Total Insurance Brokers, LLC nor its officers, directors, employees, or agents will effect insurance services in Oregon unless such activities are in full compliance with the Insurance Code. Respondent understands that this Consent Order is a public document.

Signature: /s/ *Jon David Pedersen*

Position Held: President

State of Virginia

County of Fairfax

Signed or attested before me on this 7th day of January , 2025 by Jon David Pedersen .

/s/ Tasnief Haque
Notary Public

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

CONSENT TO ENTRY OF ORDER

I, Jon David Pedersen, state that I am an officer of Benefytt Technologies, LLC. and am authorized to act on its behalf. I have read the foregoing Order and know and fully understand the contents hereof. I have been advised of Respondent's right to a hearing and right to be represented by counsel in this matter. Respondent voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. Respondent understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Insurance Code or with the terms and conditions stated herein.

Respondent further assures the Director that neither Benefytt Technologies, LLC. nor its officers, directors, employees, or agents will effect insurance services in Oregon unless such activities are in full compliance with the Insurance Code. Respondent understands that this Consent Order is a public document.

Signature: /s/ *Jon David Pedersen*

Position Held: President

State of Virginia

County of Fairfax

Signed or attested before me on this 7th day of January , 2025 by Jon David Pedersen .

/s/ Tasnief Haque
Notary Public

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