



FILED

DEC 21 2009

OFFICE OF INSURANCE REGULATION

Docketed by: WCP

KEVIN M. MCCARTY
COMMISSIONER

IN THE MATTER OF:

CASE NO.: 106631-09

AMERICAN ASSURANCE UNDERWRITERS
GROUP, LLC
a/k/a AAUG, LLC

AAUG INSURANCE COMPANY, LTD

WORLDWIDE EXPATRIATE ADVISORS, LLC

WORLDWIDE EXPATRIATE ADMINISTRATORS, LLC

ORDER TO CEASE AND DESIST

TO: AAUG, LLC
110 E. Broward Blvd., Suite 2400
Fort Lauderdale, FL 33301

Wayne Rassner
Registered Agent
AAUG Insurance Co. Ltd.
7700 North Kendall Drive, Suite 510
Miami, FL 33156

Worldwide Expatriate Administrators, LLC
2525 Embassy Dr, Suite 13
Cooper City, FL 33026

Worldwide Expatriate Advisors, LLC
2151 Lejeune Rd. #200
Coral Gables, FL 33134

YOU ARE HEREBY NOTIFIED that pursuant to the Florida Insurance Code including but not limited to Sections 624.307, 624.310, 624.401, 626.901, 626.910, 626.9571, 626.9581, and 120.569 Florida Statutes, the State of Florida, Office of Insurance has caused an investigation to be made of the insurance-related activities of AMERICAN ASSURANCE UNDERWRITERS GROUP (hereinafter "AAUG") and its affiliates and has information that the aforementioned company has been doing business as an insurer in and from the State of Florida without holding a certificate of authority to operate as an insurer in and/or from Florida. Accordingly, the Office of Insurance Regulation (hereinafter "OFFICE") intends to enter a Final Order requiring the above-referenced party to cease and desist from engaging in the business of insurance in the State of Florida pursuant to §626.901(5), Florida Statutes and requiring the payment of fines, pursuant to §626.910, Florida Statutes.

As a result of its investigation and as grounds for entry of this Order, the OFFICE hereby finds and alleges as follows:

1. The Florida Office of Insurance Regulation has jurisdiction over the subject matter hereof and the parties hereto.

2. Pursuant to §624.401, Florida Statutes, any insurer desiring to do business in the State of Florida must obtain a certificate of authority from the OFFICE prior to doing business.

3. Pursuant to §626.901, Florida Statutes, no person shall aid or facilitate any insurer not authorized to transact insurance in this state.

4. §624.401(1), Florida Statutes states:

No person shall act as an insurer, and no insurer or its agents, attorneys, subscribers, or representatives shall directly or indirectly transact insurance, in this state except as authorized by a subsisting certificate of authority issued to the insurer by the office, except as to such transactions as are expressly otherwise provided for in this code.

5. §624.401(2), Florida Statutes states:

No insurer shall from offices or by personnel or facilities located in this state solicit insurance applications or otherwise transact insurance in another state or country unless it holds a subsisting certificate of authority issued to it by the office authorizing it to transact the same kind of kinds of insurance in this state.

6. §626.901(1), Florida Statutes states:

No person shall, from offices or by personnel or facilities located in this state, or in any other state or county, directly or indirectly act as agents for, or otherwise represent or aid on behalf of another, any insurer not then authorized to transact such insurance in this state in:

- (a) The solicitation, negotiation, procurement, or effectuation of insurance or annuity contracts, or renewals thereof;
- (b) The dissemination of information as to coverage or rates;
- (c) The forwarding of applications;
- (d) The delivery of policies or contracts;
- (e) The inspection of risks;
- (f) The fixing of rates;
- (g) The investigation or adjustment of claims or losses; or
- (h) The collection or forwarding of premiums;

or in any manner represents or assist such an insurer in the transaction of insurance with respect to subjects of insurance resident, located, or to be performed in this state. If the property or risk is located in any other state, then, subject to the provisions of subsection (4), insurance may only be written with or placed in an insurer authorized to do such business in such state or in an insurer with which a licensed insurance broker of such state may lawfully place such insurance.

7. Worldwide Expatriate Advisors, LLC, and/or Worldwide Expatriate Administrators, LLC doing business individually or as Worldwide Expatriate Association, Inc. solicits or otherwise transacts and or provides for health insurance coverage from its Florida offices.

8. The OFFICE finds that Worldwide Expatriate Association, Inc. through Worldwide Advisors, LLC and/or Worldwide Expatriate Administrators, LLC (hereinafter referred collectively as “WEA”) sells health insurance coverage to United States citizens and foreign nationals, for periods of time in which they will reside outside of the United States,

through their offices located in Florida and directly through a website. Neither WEA, nor any of its affiliates, has a certificate of authority from the OFFICE in any capacity.

9. The OFFICE finds that this coverage sold by WEA is underwritten by AAUG Insurance Company, Ltd.

10. AAUG Insurance Company, Ltd., a business of AAUG, is a captive insurance company licensed by the British Virgin Islands. Neither AAUG nor AAUG Insurance Company, Ltd. holds a certificate of authority from the OFFICE in any capacity.

11. The OFFICE finds that AAUG, by and through its numerous companies and/or subsidiaries, from offices or by personnel or facilities located in Florida, solicits insurance applications and transacts insurance in another country without holding a certificate of authority issued by the OFFICE in violation of §624.401 and §626.901, Florida Statutes.

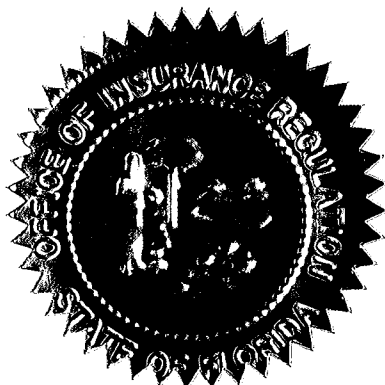
12. The OFFICE finds that any or all of the above referenced companies, either individually or collectively, solicits, negotiations, and/or procures insurance contracts from its Florida offices in violation of §624.401 and §626.901, Florida Statutes.

13. The OFFICE finds that any or all of the above referenced companies, either individually or collectively, disseminates information as to coverage or rates, forwards applications, delivers policies or contracts, inspects risk, fixes rates, investigates or adjusts claims or losses, and/or collects or forwards premiums from its Florida offices in violation of §624.401 and §626.901, Florida Statutes.

WHEREFORE, pursuant to the Florida Insurance Code and other applicable statutes, the OFFICE finds that because AAUG, LLC, AAUG Insurance Company, LTD, Worldwide Expatriate Advisors, LLC and/or Worldwide Expatriate Administrators have been operating as an insurer in the State of Florida in violation of §624.401, Florida Statutes, the OFFICE intends

to both enter a Final Order to Cease and Desist, prohibiting the operation of any insurance transactions without first obtaining a certificate of authority, and to fine for the violations enumerated herein pursuant to Chapter 626, Florida Statutes.

DONE and ORDERED this 21st day of December, 2009.





Kevin M. McCarty
Commissioner
Office of Insurance Regulation

NOTICE OF RIGHTS

Pursuant to Sections 120.569 and 120.57, Florida Statutes and Rule Chapter 28-106, Florida Administrative Code (F.A.C.), you may have a right to request a proceeding to contest this action by the Office of Insurance Regulation (hereinafter the "Office"). You may request a proceeding by filing a Petition. Your Petition for a proceeding must be in writing and must be filed with the General Counsel acting as the Agency Clerk, Office of Insurance Regulation. If served by U.S. Mail the Petition should be addressed to the Florida Office of Insurance Regulation at 612 Larson Building, Tallahassee, Florida 32399-4206. If Express Mail or hand-delivery is utilized, the Petition should be delivered to 612 Larson Building, 200 East Gaines Street, Tallahassee, Florida 32399-0300. The written Petition must be received by, and filed in the Office no later than 5:00 p.m. on the twenty-first (21) day after your receipt of this notice. Unless your Petition challenging this action is received by the Office within twenty-one (21) days from the date of the receipt of this notice, the right to a proceeding shall be deemed waived. Mailing the response on the twenty-first day will not preserve your right to a hearing.

If a proceeding is requested and there is no dispute of material fact the provisions of Section 120.57(2), Florida Statutes may apply. In this regard you may submit oral or written evidence in opposition to the action taken by this agency or a written statement challenging the grounds upon which the agency has relied. While a hearing is normally not required in the absence of a dispute of fact, if you feel that a hearing is necessary one may be conducted in Tallahassee, Florida or by telephonic conference call upon your request.

If you dispute material facts which are the basis for this agency's action you may request a formal adversarial proceeding pursuant to Sections 120.569 and 120.57(1), Florida Statutes. If you request this type of proceeding, the request must comply with all of the requirements of Rule Chapter 28-106.2015, F.A.C., including but not limited to:

- a) A statement requesting an administrative hearing identifying those material facts that are in dispute. If there are none, the petition must so state; and
- b) A statement of when the respondent received notice of the agency's action.

These proceedings are held before a State Administrative Law Judge of the Division of Administrative Hearings. Unless the majority of witnesses are located elsewhere, the Office will request that the hearing be conducted in Tallahassee.

In some instances, you may have additional statutory rights than the ones described herein.

Failure to follow the procedure outlined with regard to your response to this notice may result in the request being denied. Any request for administrative proceeding received prior to the date of this notice shall be deemed abandoned unless timely renewed in compliance with the guidelines as set out above.

CERTIFICATE OF SERVICE

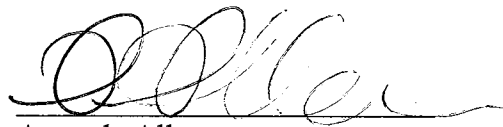
I **HEREBY CERTIFY** that a true and correct copy of the foregoing Order to Cease and Desist has been sent via certified mail this 21 day of December, 2009 to:

**AAUG, LLC
110 E. Broward Blvd., Suite 2400
Fort Lauderdale, FL 33301**

**Wayne Rassner
Registered Agent
AAUG Insurance Co. Ltd.
7700 North Kendall Drive, Suite 510
Miami, FL 33156**

**Worldwide Expatriate Administrators, LLC
2525 Embassy Dr, Suite 13
Cooper City, FL 33026**

**Worldwide Expatriate Advisors, LLC
2151 Lejeune Rd. #200
Coral Gables, FL 33134**



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