

OFFICE OF INSURANCE REGULATION

KEVIN M. McCARTY
COMMISSIONER

IN THE MATTER OF:

CASE NO.: 111720-10

**LOUIS R. DELUCA III;
GARY L. KARNS, JR.;
ASSOCIATION OF INDEPENDENT MANAGERS;
INTEGRATED INSURANCE MARKETING, INC.;
AIM HEALTH PLANS;
CEO CLUB, INC.
(a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.);
INSURANCE RESOURCE GROUP, INC.;
HUDSON VALLEY CONSULTANTS, LLC
(d/b/a CEO HEALTH CLUB BENEFITS);
KEVIN R. DUNN;
RICHARD DUNN;
WILLIAM WORTHY II;
DAVID L. CLARK;
STAR GROUP, U.K./PHOENIX INSURANCE COMPANY;
VIKING ADMINISTRATORS, LLC;
COMMERCE BENEFITS GROUP AGENCY;
NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC;
METROPOLITAN BUSINESS ALLIANCE, LLC; and
WORLDWIDE FAMILY BENEFITS ASSOCIATION**

FINAL ORDER TO CEASE AND DESIST

THIS MATTER came on before the undersigned Insurance Commissioner of the State of Florida for consideration and final agency action, who having considered the record in this case and being fully advised of the premises, finds and orders as follows:

1. The Office of Insurance Regulation (hereinafter "OFFICE") has jurisdiction for purposes of this action.

2. On August 2, 2010, the OFFICE issued an Order to Cease and Desist (hereinafter "ORDER") notifying LOUIS R. DELUCA III; GARY L. KARNS, JR.; ASSOCIATION OF INDEPENDENT MANAGERS; INTEGRATED INSURANCE MARKETING, INC.; AIM HEALTH PLANS; CEO CLUB, INC. (a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.); INSURANCE RESOURCE GROUP, INC.; HUDSON VALLEY CONSULTANTS, LLC (d/b/a CEO HEALTH CLUB BENEFITS); KEVIN R. DUNN; RICHARD DUNN; WILLIAM WORTHY II; DAVID L. CLARK; STAR GROUP, U.K./PHOENIX INSURANCE COMPANY; COMMERCE BENEFITS GROUP AGENCY; VIKING ADMINISTRATORS, LLC; NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC; METROPOLITAN BUSINESS ALLIANCE, LLC; and WORLDWIDE FAMILY BENEFITS ASSOCIATION, that they were engaging in the unauthorized business of insurance in the state of Florida.¹

3. The Order was served on the above-named parties by U.S. Certified Mail or personal service.

4. GARY L. KARNS, JR.; ASSOCIATION OF INDEPENDENT MANAGERS; INTEGRATED INSURANCE MARKETING; AIM HEALTH PLANS; DAVID L. CLARK; STAR GROUP, U.K./PHOENIX INSURANCE COMPANY; VIKING ADMINISTRATORS; WORLDWIDE FAMILY BENEFITS ASSOCIATION; and WILLIAM WORTHY did not request a proceeding to contest the Order.

5. LOUIS R. DELUCA III and INSURANCE RESOURCE GROUP, INC. timely filed a petition for administrative hearing to contest the Office's Order. The Office dismissed the petition without prejudice because it did not comply with Sections 120.569 and 120.57, Florida Statutes, and Rule 28-106.201, Florida Administrative Code. The parties were granted

¹ On September 1, 2011, the Office issued a Final Order Vacating the Cease and Desist Order against Commerce Benefits Group Agency, after determining that the company was not acting as a third party administrator on behalf of the other named parties.

twenty-one days to amend their petition.

6. LOUIS R. DELUCA III and INSURANCE RESOURCE GROUP, INC. did not file an amended petition for administrative hearing.

7. CEO CLUB, INC.; HUDSON VALLEY CONSULTANTS, LLC; KEVIN R. DUNN; RICHARD DUNN; NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC; and METROPOLITAN BUSINESS ALLIANCE, LLC filed a response to the Office's Order on August 9, 2010. The Office notified the parties that a petition for administrative hearing should be filed in accordance with Section 120.569 and 120.57, Florida Statutes, and Rule 28-106.201, Florida Administrative Code. The parties were granted twenty-one days to file a petition.

8. CEO CLUB, INC.; HUDSON VALLEY CONSULTANTS, LLC; KEVIN R. DUNN; RICHARD DUNN; NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC; and METROPOLITAN BUSINESS ALLIANCE, LLC did not file a petition for administrative hearing.

IT IS HEREBY ORDERED:

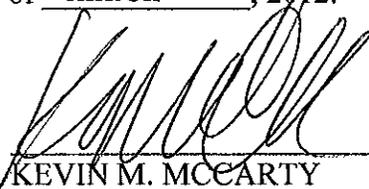
9. The findings of fact and conclusions of law contained in the August 2, 2010, Order to Cease and Desist, are hereby **ADOPTED** and **INCORPORATED** into this Final Order to Cease and Desist.

10. LOUIS R. DELUCA III; GARY L. KARNS, JR.; ASSOCIATION OF INDEPENDENT MANAGERS; INTEGRATED INSURANCE MARKETING, INC.; AIM HEALTH PLANS; CEO CLUB, INC. (a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.); INSURANCE RESOURCE GROUP, INC.; HUDSON VALLEY CONSULTANTS, LLC (d/b/a CEO HEALTH CLUB BENEFITS); KEVIN R. DUNN; RICHARD DUNN; WILLIAM WORTHY II; DAVID L. CLARK; STAR GROUP, U.K./PHOENIX INSURANCE

COMPANY; VIKING ADMINISTRATORS, LLC; NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC; METROPOLITAN BUSINESS ALLIANCE, LLC; and WORLDWIDE FAMILY BENEFITS ASSOCIATION, whether engaging in the business of insurance in the State of Florida as an insurance provider, or aiding and representing an insurance provider, either directly or indirectly through named or unnamed persons, successor companies, entities or agents, shall forthwith **CEASE AND DESIST** from engaging in the business of insurance in the State of Florida or with Florida consumers, including individuals, businesses, and state or local government agencies. However, regardless of the ongoing prohibition against engaging in the business of insurance in the State of Florida, LOUIS R. DELUCA III; GARY L. KARNs, JR.; ASSOCIATION OF INDEPENDENT MANAGERS; INTEGRATED INSURANCE MARKETING, INC.; AIM HEALTH PLANS; CEO CLUB, INC. (a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.); INSURANCE RESOURCE GROUP, INC.; HUDSON VALLEY CONSULTANTS, LLC (d/b/a CEO HEALTH CLUB BENEFITS); KEVIN R. DUNN; RICHARD DUNN; WILLIAM WORTHY II; DAVID L. CLARK; STAR GROUP, U.K./PHOENIX INSURANCE COMPANY; VIKING ADMINISTRATORS, LLC; NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC; METROPOLITAN BUSINESS ALLIANCE, LLC; and WORLDWIDE FAMILY BENEFITS ASSOCIATION shall pay any and all valid claims or otherwise fully service any and all policies or programs executed in the State of Florida or issued to any Florida consumer.

DONE AND ORDERED this 13TH day of MARCH, 2012.





KEVIN M. MCCARTY
Commissioner
Office of Insurance Regulation

NOTICE OF RIGHTS

Any party to these proceedings adversely affected by this Order is entitled to seek review of this Order pursuant to Section 120.68, Florida Statutes, and Rule 9.110, Fla. R. App. P. Review proceedings must be instituted by filing a petition or notice of appeal with the General Counsel, for the OFFICE of Insurance Regulation, acting as the Agency Clerk, at 612 Larson Building, Tallahassee, Florida, 32399 and filing a copy of the same with the appropriate District Court of Appeal within thirty (30) days of rendition of this Order.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Final Order to Cease and Desist has been sent by Certified Mail this 13TH day of MARCH, 2012, to:

Michael Camilleri
Matrix Insurance Consulting, LLC
P.O. Box 880625
Boca Raton, Fl 33488
Attorney for Louis R. Deluca III
And Insurance Resource Group, Inc.

CEO Club, Inc.
1 Maiden Lane 5th Floor
New York, New York 10038

Gary L. Karns, Jr
1145 Highbrook
Suite 411 and PH7
Akron, Ohio 43301

Hudson Valley Consultants, LLC
c/o Kevin R. Dunn
24 Durham Street
Pompton Lakes, NJ 07442

Association of Independent Managers
20 Madison Avenue
Valhalla, New York 10595

Kevin R. Dunn
24 Durham Street
Pompton Lakes, NJ 07442

Integrated Insurance Marketing Inc.
1145 Highbrook
Suite 411 and PH7
Akron, Ohio 43301

Richard Dunn
14 Fairview Road
Hopewell Junction, NY 12533

AIM Health Plans
1145 Highbrook
Suite 411 and PH7
Akron, Ohio 43301

William Worthy, II
Anderson City Detention Center
401 South Main Street
Anderson, SC 29624

David L. Clark
P.O. Box 74
Basking Ridge, NJ 07920

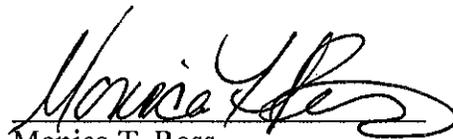
Viking Administrators, LLC
P.O. Box 171
Avon Lake, Ohio 44012

Commerce Benefits Group Agency
c/o James D. Fox, Esq
850 Park Shore Drive
Third Floor, Trianon Center
Naples, Florida 34103

National Association of Business Leadership, LLC
9444 Waples St., Suite 330
San Diego, CA 92121

Worldwide Family Benefits Association
c/o Corporate Creations Network
8275 South Easter Avenue #200
Las Vegas, NV 89123

Metropolitan Business Alliance, LLC d/b/a
National Association of Business Leadership, LLC
24 Durham Street
Pompton Lakes, NJ 07442

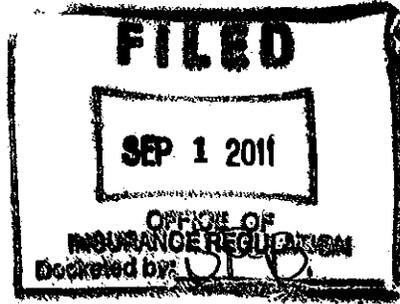


Monica T. Ross
Fla. Bar No. 0056988
Assistant General Counsel
Office of Insurance Regulation
200 East Gaines Street
Tallahassee, Florida 32399-4206
Telephone: 850-413-4159
Fax: 850-922-2543



OFFICE OF INSURANCE REGULATION

KEVIN M. McCARTY
COMMISSIONER



IN THE MATTER OF:

CASE NO.: 111720-10

**LOUIS R. DELUCA III;
GARY L. KARNS, JR.;
ASSOCIATION OF INDEPENDENT MANAGERS;
INTEGRATED INSURANCE MARKETING, INC.;
AIM HEALTH PLANS;
CEO CLUB, INC.
(a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.);
INSURANCE RESOURCE GROUP, INC.;
HUDSON VALLEY CONSULTANTS, LLC
(d/b/a CEO HEALTH CLUB BENEFITS);
KEVIN R. DUNN;
RICHARD DUNN;
WILLIAM WORTHY II;
DAVID L. CLARK;
STAR GROUP, U.K./PHOENIX INSURANCE COMPANY;
VIKING ADMINISTRATORS, LLC;
COMMERCE BENEFITS GROUP AGENCY;
NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC;
METROPOLITAN BUSINESS ALLIANCE, LLC; and
WORLDWIDE FAMILY BENEFITS ASSOCIATION**

FINAL ORDER VACATING THE CEASE AND DESIST ORDER AGAINST

COMMERCE BENEFITS GROUP AGENCY

THIS CAUSE came on before the State of Florida, OFFICE OF INSURANCE REGULATION (hereinafter referred to as the "OFFICE") upon the filing of a petition for an administrative hearing by COMMERCE BENEFITS GROUP AGENCY (hereinafter referred to as "CBGA" a/k/a Commerce Benefits Group Agency, Inc.), contesting the OFFICE's Cease and

Desist Order issued against the above-named parties. Following a complete review of the entire record, and upon consideration thereof, and being otherwise fully advised in the premises, the OFFICE hereby finds as follows:

1. The OFFICE has jurisdiction over the subject matter of, and parties to, this proceeding.

2. CBGA is a software vendor and insurance administrator domiciled in the state of Ohio. CBGA was granted a certificate of authority to act as a third party administrator in the state of Florida on January 1, 1998. It subsequently surrendered its certificate of authority, and is currently not authorized to act as a third party administrator, or otherwise transact insurance, in the state of Florida.

3. The OFFICE conducted an investigation into the activities of LOUIS R. DELUCA III; GARY L. KARNS, JR.; ASSOCIATION OF INDEPENDENT MANAGERS; INTEGRATED INSURANCE MARKETING, INC.; AIM HEALTH PLANS; CEO CLUB, INC. (a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.); INSURANCE RESOURCE GROUP, INC.; HUDSON VALLEY CONSULTANTS, LLC (d/b/a CEO HEALTH CLUB BENEFITS); KEVIN R. DUNN; RICHARD DUNN; WILLIAM WORTHY II; DAVID L. CLARK; STAR GROUP, U.K./PHOENIX INSURANCE COMPANY; VIKING ADMINISTRATORS, LLC; COMMERCE BENEFITS GROUP AGENCY; NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC; METROPOLITAN BUSINESS ALLIANCE, LLC; and WORLDWIDE FAMILY BENEFITS ASSOCIATION. On August 2, 2010, the OFFICE issued a Cease and Desist Order against the above-named entities for engaging in the unauthorized business of insurance in the state of Florida.

4. On or about August 24, 2010, CBGA provided the OFFICE with information regarding its involvement with the above-named parties, including supporting documentation.

5. CBGA represented that it entered into a contract with Viking Administrators, LLC (hereinafter referred to as "Viking") to handle mail services, scanning and other functions for Viking-administered limited benefit plans.

6. CBGA's supporting documentation indicates that CBGA ceased doing business with Viking on or about March 24, 2010, prior to the issuance of the OFFICE's Cease and Desist Order.

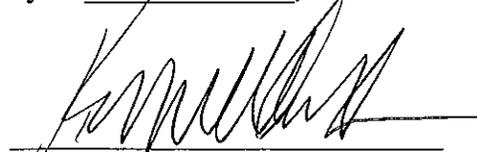
7. On or about August 31, 2010, CBGA timely filed a petition for a formal administrative hearing asserting, among other things, that at all time relevant to the investigation, it has acted solely as a software vendor in the state of Florida.

8. Upon review of the petition and supporting documents provided by CBGA, and in reliance thereon, in addition to the OFFICE's own subsequent investigation, the OFFICE has determined that CBGA was not acting as a third party administrator on behalf of the above-named parties.

THEREFORE, the Cease and Desist Order issued on August 2, 2010, is hereby vacated as to COMMERCE BENEFITS GROUP AGENCY, and only remains in force against the remaining parties.

DONE AND ORDERED this 1ST day of SEPTEMBER, 2011.





KEVIN M. McCARTY
Commissioner
Office of Insurance Regulation

NOTICE OF RIGHTS

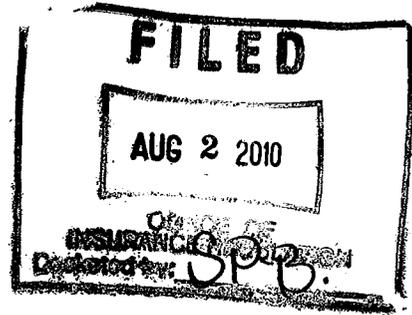
Any party to these proceedings adversely affected by this Order is entitled to seek review of this Order pursuant to Section 120.68, Florida Statutes, and Rule 9.110, Fla. R. App. P. Review proceedings must be instituted by filing a petition or notice of appeal with the General Counsel, for the OFFICE of Insurance Regulation, acting as the Agency Clerk, at 612 Larson Building, Tallahassee, Florida, 32399 and filing a copy of the same with the appropriate District Court of Appeal within thirty (30) days of rendition of this Order.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this FINAL ORDER VACATING THE CEASE AND DESIST ORDER AGAINST COMMERCE BENEFITS GROUP AGENCY, was sent this 1 day of September 2016 by Certified Mail to the following:

James D. Fox, Esquire
850 Park Shore Drive
Third Floor, Trianon Center
Naples, Florida 34103


Monica T. Ross
Fla. Bar No. 0056988
Assistant General Counsel
Office of Insurance Regulation
200 East Gaines Street
Tallahassee, FL 32399-4206
(850) 413-4159



OFFICE OF INSURANCE REGULATION

KEVIN M. McCARTY
COMMISSIONER

IN THE MATTER OF:

CASE NO.: 111720-10

**LOUIS R. DELUCA III
GARY L. KARNS, JR.
ASSOCIATION OF INDEPENDENT MANAGERS
INTEGRATED INSURANCE MARKETING, INC.
AIM HEALTH PLANS
CEO CLUB, INC. (a/k/a CHIEF EXECUTIVE
OFFICERS CLUB, INC.)
INSURANCE RESOURCE GROUP, INC.
HUDSON VALLEY CONSULTANTS, LLC
(d/b/a CEO HEALTH CLUB BENEFITS)
KEVIN R. DUNN
RICHARD DUNN
WILLIAM WORTHY II
DAVID L. CLARK
STAR GROUP, U.K./PHOENIX
INSURANCE COMPANY
VIKING ADMINISTRATORS, LLC
COMMERCE BENEFITS GROUP AGENCY
NATIONAL ASSOCIATION OF
BUSINESS LEADERSHIP, LLC
METROPOLITAN BUSINESS ALLIANCE, LLC
WORLDWIDE FAMILY BENEFITS ASSOCIATION**

ORDER

TO:

LOUIS R. DELUCA III
1618 Boettler Road
Uniontown, Ohio 44685
And
1106 Smith Ridge Road

GARY L. KARNS, JR.
1618 Boettler Road
Uniontown, Ohio 44685
and
1145 Highbrook

New Canaan, Connecticut 06840

ASSOCIATION OF INDEPENDENT MANAGERS

20 Madison Avenue
Valhalla, New York 10595

AIM HEALTH PLANS

1145 Highbrook
Suite 411 and PH7
Akron, Ohio 43301
and
3465 South Arlington Road, #154
Akron, Ohio 44312

and
Post Office Box 1495
Toledo, Ohio 43603

INSURANCE RESOURCE GROUP, INC.

20 Madison Avenue
Valhalla, New York 10595

KEVIN R. DUNN

100 Eagle Rock Avenue
East Hanover, New Jersey 07936

WILLIAM WORTHY II

Post Office Box 462
Isle of Palms, South Carolina 29451

and
Post Office Box 611
Blythewood, South Carolina 29016

STAR GROUP U.K./PHOENIX INSURANCE COMPANY

% Chief Financial Officer
200 East Gaines Street
Tallahassee, Florida 32399

COMMERCE BENEFITS GROUP

Thomas J. Patton, CEO
33479 Lake Road
Avon Lake, Ohio 44012

Suite 411 and PH7
Akron, Ohio 43301

INTEGRATED INSURANCE MARKETING, INC.

Gary L. Karns, Jr.
1618 Boettler Road
Uniontown, Ohio 44685
and
1145 Highbrook
Suite 411 and PH7
Akron, Ohio 43301

CEO CLUB, INC. (a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.)

Joseph Mancuso, President
15 Broad Street, Suite 1120
New York, New York 10005

HUDSON VALLEY CONSULTANTS, LLC (d/b/a CEO HEALTH CLUB BENEFITS)

Kevin R. Dunn, Managing Director
Richard Dunn
100 Eagle Rock Avenue
East Hanover, New Jersey 07936

RICHARD DUNN

100 Eagle Rock Avenue
East Hanover, New Jersey 07936

DAVID L. CLARK

118 A Fulton Street
Post Office Box 138
New York, New York 10038
and
Post Office Box 74
Basking Ridge, New Jersey 07920

VIKING ADMINISTRATORS, LLC

% Kathleen D. Cauthen, Esquire
Post Office Box 171
Avon Lake, Ohio 44012

**NATIONAL ASSOCIATION OF
BUSINESS LEADERSHIP, LLC**
100 Eagle Rock Avenue, Suite 121
East Hanover, New Jersey 07936

**METROPOLITAN BUSINESS
ALLIANCE, LLC**
100 Eagle Rock Avenue, Suite 121
East Hanover, New Jersey 07936

and
Post Office Box 611
Blythewood, South Carolina 29016

**WORLDWIDE FAMILY BENEFITS
ASSOCIATION**
8655 East Via de Ventura, #G200
Scottsdale, Arizona 85258

YOU ARE HEREBY NOTIFIED that pursuant to the provisions of the Florida Insurance Code, the State of Florida Office of Insurance Regulation (the "OFFICE") has caused an investigation to be made of the insurance-related activities of LOUIS R. DELUCA III, GARY L. KARNS, JR., ASSOCIATION OF INDEPENDENT MANAGERS, INTEGRATED INSURANCE MARKETING, INC., CEO CLUB, INC. (a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.), INSURANCE RESOURCE GROUP, INC., HUDSON VALLEY CONSULTANTS, LLC d/b/a CEO HEALTH CLUB BENEFITS, KEVIN R. DUNN, RICHARD DUNN, WILLIAM WORTHY II, DAVID L. CLARK, STAR GROUP U.K./PHOENIX INSURANCE COMPANY, VIKING ADMINISTRATORS LLC, and COMMERCE BENEFITS GROUP, NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC, METROPOLITAN BUSINESS ALLIANCE, LLC, WORLDWIDE FAMILY BENEFITS ASSOCIATION (collectively "Respondents"), and that the OFFICE intends to issue a Final Order pursuant to Sections 626.909, 626.910, and 626.9581, Florida Statutes, requiring the aforementioned individuals and companies to cease and desist from engaging in the transaction of insurance in the state of Florida and pay fines, as set forth in Sections 624.4211, 626.8805, and 626.910, Florida Statutes (2009). As grounds therefor, the OFFICE alleges the following:

GENERAL ALLEGATIONS

1. The Office has jurisdiction over the parties and subject matter pursuant to Sections 624.307, 624.310, 624.317, 624.318, 626.909, and 626.9561, Florida Statutes.
2. LOUIS R. DELUCA III (“DELUCA”) and GARY L. KARNS, JR. (“KARNS”) formed the ASSOCIATION OF INDEPENDENT MANAGERS (“AIM”) and INTEGRATED INSURANCE MARKETING, INC. (“INTEGRATED”) to market, offer, and provide limited health insurance plans.
3. Neither DELUCA nor KARNS holds a certificate of authority from the OFFICE to transact insurance in the state of Florida.
4. KARNS has a non-resident life and variable annuity license and nonresident health license issued by the Florida Department of Financial Services.
5. DELUCA and KARNS are not exempt under any provision, either state or federal, from the requirements of the Florida Insurance Code
6. AIM is a foreign corporation located at 20 Madison Avenue, Valhalla, New York 10595.
7. INTEGRATED is a foreign corporation located at 1618 Boettler Road, Uniontown, Ohio 44685.
8. AIM and INTEGRATED do not hold certificates of authority from the OFFICE and are not licensed to transact insurance, in any capacity, in the state of Florida.
9. AIM and INTEGRATED are not exempt from the requirements of the Florida Insurance Code.
10. DELUCA, KARNS, AIM, and INTEGRATED marketed, offered, and provided limited health insurance benefit plans (“AIM HEALTH PLANS”) in the state of Florida.

11. AIM HEALTH PLANS is a foreign corporation located at 1145 Highbrook, Suite 411 and PH7, Akron, Ohio 43301.

12. AIM HEALTH PLANS does not hold a certificate of authority from the OFFICE and is not licensed to transact insurance, in any capacity, in the state or Florida.

13. AIM HEALTH PLANS is not exempt from the requirements of the Florida Insurance Code.

14. DELUCA, KARNS, AIM, and/or INTEGRATED offered and provided AIM HEALTH PLANS to at least 1,800 residents of the state of Florida.

15. DELUCA, KARNS, AIM, and/or INTEGRATED worked with licensed Florida agents to market and sell AIM HEALTH PLANS. David Rutstein is a Florida licensed agent in Boca Raton, Florida, who marketed and sold at least one hundred and eighty AIM HEALTH PLANS in the state of Florida. David Rutstein recruited other Florida licensed agents to market and sell AIM HEALTH PLANS.

16. DELUCA, KARNS, and INTEGRATED marketed, offered, and provided AIM HEALTH PLANS to members of CEO CLUB, INC.

17. CEO CLUB, INC. ("CEO CLUB") is a membership association based in New York, New York. Its principal place of business is located at 15 Broad Street, Suite 1120, New York, New York 10005. CEO CLUB, INC., also does business as the CHIEF EXECUTIVE OFFICERS CLUB, INC. CEO CLUB is comprised of local clubs with chapters located throughout various regions. CEO CLUB provides benefits, including health insurance benefits, through association memberships available to the public for a fee through its website located at <http://www.ceoclubs.org>.

18. CEO CLUB is not, and has never been, authorized to engage in the transaction of insurance in the state of Florida.

19. CEO CLUB is not exempt from the requirements of the Florida Insurance Code.

20. CEO CLUB offered and provided limited health insurance benefits to members who were residents of the state of Florida.

21. CEO CLUB entered into an arrangement with INSURANCE RESOURCE GROUP, INC. ("INSURANCE RESOURCE") to administer limited health insurance benefit policies for members of the CEO CLUB.

22. INSURANCE RESOURCE is a foreign corporation located at 20 Madison Avenue, Valhalla, New York 10595.

23. INSURANCE RESOURCE is not, and has never been, authorized to engage in the transaction of insurance in the state of Florida.

24. INSURANCE RESOURCE is not exempt from the requirements of the Florida Insurance Code.

25. DELUCA owns and/or controls INSURANCE RESOURCE.

26. DELUCA is not a licensed insurance representative of any type in the state of Florida.

27. DELUCA and INSURANCE RESOURCE administered limited health insurance benefits policies for Florida members of CEO CLUB.

28. HUDSON VALLEY CONSULTANTS, LLC is a foreign corporation located at 100 Eagle Rock Avenue, East Hanover, New Jersey 07936. HUDSON VALLEY CONSULTANTS, LLC, conducts business under the name of CEO CLUB BENEFITS.

29. HUDSON VALLEY CONSULTANTS, LLC d/b/a CEO HEALTH CLUB BENEFITS (“HUDSON VALLEY”) is a consulting organization that develops and provides resources, including health insurance benefits, to members of the CEO CLUB.

30. HUDSON VALLEY is not exempt from the requirements of the Florida Insurance Code.

31. KEVIN R. DUNN is the Managing Director of HUDSON VALLEY.

32. RICHARD DUNN acts as a consultant to HUDSON VALLEY doing business as CEO CLUB BENEFITS.

33. Neither KEVIN R. DUNN nor RICHARD DUNN holds a certificate of authority from the OFFICE or is licensed to transact insurance, in any capacity, in the state or Florida.

34. KEVIN R. DUNN and RICHARD DUNN are not exempt from the requirements of the Florida Insurance Code.

35. KEVIN R. DUNN, RICHARD DUNN, and HUDSON VALLEY procured and facilitated health insurance benefits for residents of Florida who were members of the CEO CLUB.

36. WILLIAM WORTHY II (“WORTHY”) and DAVID L. CLARK (“CLARK”) offered or provided health insurance benefits to HUDSON VALLEY and Florida members of the CEO CLUB.

37. Neither WORTHY nor CLARK holds a certificate of authority from the OFFICE or is licensed to transact insurance, in any capacity, in the state or Florida.

38. STAR GROUP U.K./PHOENIX INSURANCE COMPANY (“STAR GROUP”) is a foreign corporation located at 29 West End Road, Southall, England UB1 1JQ.

39. STAR GROUP is a foreign corporation that offers and provides insurance products.

40. STAR GROUP is not, and has never been, authorized to engage in the transaction of insurance in the state of Florida.

41. STAR GROUP is not exempt from the requirements of the Florida Insurance Code.

42. WORTHY and CLARK marketed, offered, and provided health insurance benefits written and/or issued by STAR GROUP and/or AIM HEALTH PLANS to residents of the state of Florida.

43. WORTHY and CLARK marketed, offered, and provided limited health insurance benefits written and/or issued by STAR GROUP to members of CEO CLUB.

44. On June 24, 2010, the OFFICE ordered WORTHY and CLARK to cease and desist from transacting unauthorized insurance in the state of Florida. The Order was based on findings of fact that WORTHY, CLARK, and the other respondents named in that Order offered or sold health insurance benefits to residents of the state of Florida.

45. VIKING ADMINISTRATORS, LLC (“VIKING”) is a foreign corporation located at Post Office Box 611, Blythewood, South Carolina 29016.

46. VIKING is not, and has never been, authorized to engage in the transaction of insurance in the state of Florida.

47. VIKING is not exempt from the requirements of the Florida Insurance Code.

48. VIKING acted as an administrator on behalf of HUDSON VALLEY, CEO CLUB, WORTHY, CLARK, and/or STAR GROUP for health insurance benefits sold in the state of Florida.

49. VIKING entered in an agreement with COMMERCE BENEFITS GROUP AGENCY (“COMMERCE GROUP”) to act as an administrator on behalf of HUDSON VALLEY, CEO CLUB, WORTHY, CLARK, and/or STAR GROUP.

50. COMMERCE GROUP is a foreign corporation located at 33479 Lake Road, Avon Lake, Ohio 44012.

51. COMMERCE GROUP is not authorized to engage in the transaction of insurance in the state of Florida. COMMERCE GROUP surrendered its Certificate of Authority as a Third-Party Administrator in the state of Florida.

52. COMMERCE GROUP is not exempt from the requirements of the Florida Insurance Code.

53. COMMERCE GROUP acted as an administrator on behalf of HUDSON VALLEY, CEO CLUB, WORTHY, CLARK, STAR GROUP, and/or VIKING for health insurance benefits sold in the state of Florida.

54. NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC (“NABL”) is a membership association based in New Jersey. Its principal place of business is located at 100 Eagle Rock Avenue, Suite 121, East Hanover, New Jersey 07936.

55. NABL provides benefits, including health insurance benefits, through its association memberships.

56. NABL is not, and has never been, authorized to engage in the transaction of insurance in the state of Florida.

57. NABL is not exempt from the requirements of the Florida Insurance Code.

58. NABL offered and provided AIM HEALTH PLANS to members who were residents of the state of Florida.

59. METROPOLITAN BUSINESS ALLIANCE, LLC (“METROPOLITAN”) does business as NATIONAL ASSOCIATION OF BUSINESS LEADERSHIP, LLC.

60. METROPOLITAN is not authorized to transact insurance in the state of Florida in any capacity.

61. WORLDWIDE FAMILY BENEFITS ASSOCIATION (“WORLDWIDE”) is a membership association based in Arizona. Its principal place of business is located at 8655 East Via de Ventura, #G200, Scottsdale, Arizona 85258. WORLDWIDE provides benefits, including health insurance benefits, through its association memberships.

62. WORLDWIDE is not, and has never been, authorized to engage in the transaction of insurance in the state of Florida.

63. WORLDWIDE is not exempt from the requirements of the Florida Insurance Code.

64. WORLDWIDE offered and provided AIM HEALTH PLANS to members who were residents of the state of Florida.

65. The purpose of Florida’s Unauthorized Insurers Process Law is to subject certain insurers and persons representing or aiding such insurers to the jurisdiction of courts of this state in suits by or on behalf of insureds or beneficiaries under insurance contracts. The Florida Legislature declares that it is a subject of concern that many residents of this state hold policies of insurance issued or delivered in the state by insurers while not authorized to do business in this state, thus presenting to such residents the often insuperable obstacle of resorting to distant forums for the purpose of asserting legal rights under such policies. § 626.905, Fla. Stat. (2009).

66. It is the obligation and duty of the state of Florida to protect its residents and also proceed under the Unauthorized Insurers Process Law through the Office or Department in the courts of this state. § 626.909(1), Fla. Stat.

COUNT I: DELUCA, KARNS, AIM, INTEGRATED, AIM HEALTH PLANS, CEO CLUB, INSURANCE RESOURCE, HUDSON VALLEY, KEVIN R. DUNN, RICHARD DUNN, WORTHY, CLARK, STAR GROUP, VIKING, COMMERCE GROUP, NABL, METROPOLITAN, AND WORLDWIDE ENGAGED IN THE UNAUTHORIZED TRANSACTION OF INSURANCE IN FLORIDA DIRECTLY OR INDIRECTLY THROUGH AN UNAUTHORIZED AGENT OR REPRESENTATIVE, § 626.901, FLA. STAT.

67. The general allegations, *supra* ¶¶ 1-66, are hereby re-alleged and incorporated by this reference.

68. Section 624.401(1), Florida Statutes, provides:

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.

69. Section 626.901, Florida Statutes, provides:

(1) No person shall, from offices or by personnel or facilities located in this state, or in any other state or country, directly or indirectly act as agent 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 other manner represent 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.

70. Section 626.910, Florida Statutes, provides:

Any unauthorized insurer or person representing or aiding such insurer transacting insurance in this state and subject to service of process as referred to in s. 626.909 shall forfeit and pay to the state a civil penalty of not more than \$1,000 for each nonwillful violation, or not more than \$10,000 for each willful violation, of any lawful order of the office or department or any provision of this code.

71. Section 626.9581, Florida Statutes, provides:

If it is determined that the person charged has engaged in an unfair or deceptive act or practice or the unlawful transaction of insurance, the department or office shall also issue an order requiring the violator to cease and desist from engaging in such method of competition, act, or practice or the unlawful transaction of insurance.

72. DELUCA, KARNS, AIM, INTEGRATED, AIM HEALTH PLANS, CEO CLUB, INSURANCE RESOURCE, HUDSON VALLEY, KEVIN R. DUNN, RICHARD DUNN, WORTHY, CLARK, STAR GROUP, VIKING, COMMERCE GROUP, NABL, METROPOLITAN, and WORLDWIDE offered or provided health insurance benefits to residents of the state of Florida.

73. DELUCA, KARNS, AIM, INTEGRATED, AIM HEALTH PLANS, CEO CLUB, INSURANCE RESOURCE, HUDSON VALLEY, KEVIN R. DUNN, RICHARD DUNN, WORTHY, CLARK, STAR GROUP, VIKING, COMMERCE GROUP, NABL, METROPOLITAN, and/or WORLDWIDE marketed, offered, or provided limited health insurance benefits to at least 1,800 residents of the state of Florida.

WHEREFORE, because DELUCA, KARNS, AIM, INTEGRATED, AIM HEALTH PLANS, CEO CLUB, INSURANCE RESOURCE, HUDSON VALLEY, KEVIN R. DUNN, RICHARD DUNN, WORTHY, CLARK, STAR GROUP, VIKING, COMMERCE GROUP, NABL, METROPOLITAN, and WORLDWIDE violated Sections 624.401 and 626.901, Florida Statutes, the OFFICE intends to issue an Order requiring the Respondents to cease and desist from engaging in the unlawful transaction of insurance in the state of Florida and/or to pay fines of up to \$1,000 for each violation.

COUNT II: VIKING AND COMMERCE GROUP ACTED AS ADMINISTRATORS OR HELD THEMSELVES OUT AS ADMINISTRATORS IN FLORIDA WITHOUT VALID CERTIFICATES OF AUTHORITY, § 626.8805, FLA. STAT.

74. The general allegations, *supra* ¶¶ 1-66, are hereby re-alleged and incorporated by this reference.

75. Section 626.88(1), Florida Statutes, defines an “Administrator” as “any person who directly or indirectly solicits or effects coverage of, collects charges or premiums from, or adjusts or settles claims on residents of this state in connection with authorized commercial self-insurance funds or with insured or self-insured programs which provide life or health insurance coverage or coverage of any other expenses described in s. 624.33(1).”

76. Section 626.8805(1), Florida Statutes, provides:

It is unlawful for any person to act as or hold himself or herself out to be an administrator in this state without a valid certificate of authority issued by the office pursuant to ss. 626.88-626.894. To qualify for and hold authority to act as an administrator in this state, an administrator must otherwise be in compliance with this code and with its organizational agreement. The failure of any person to hold such a certificate while acting as an administrator shall subject such person to a fine of not less than \$5,000 or more than \$10,000 for each violation.

77. Section 626.9581, Florida Statutes, provides:

If it is determined that the person charged has engaged in an unfair or deceptive act or practice or the unlawful transaction of insurance, the department or office shall also issue an order requiring the violator to cease and desist from engaging in such method of competition, act, or practice or the unlawful transaction of insurance.

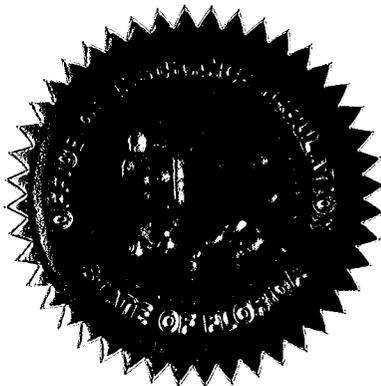
78. VIKING acted as an administrator in the state of Florida on behalf of HUDSON VALLEY, CEO CLUB, WORTHY, CLARK, and/or STAR GROUP for health insurance benefits sold in the state of Florida

79. COMMERCE GROUP acted as an administrator on behalf of HUDSON VALLEY, CEO CLUB, WORTHY, CLARK, STAR GROUP, and/or VIKING for health insurance benefits sold in the state of Florida

80. VIKING and/or COMMERCE GROUP administered at least 1,800 limited health benefit policies sold in the state of Florida.

WHEREFORE, because VIKING and COMMERCE GROUP violated Section 626.8805, Florida Statutes, the OFFICE intends to issue an Order requiring VIKING and COMMERCE GROUP to cease and desist from engaging in the unlawful transaction of insurance in the state of Florida and/or to pay fines of up to \$10,000 for each violation.

DONE AND ORDERED this 2nd day of August 2010.





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 has been furnished by U.S. Certified Mail this 2nd day of August 2010 to:

LOUIS R. DELUCA III
1618 Boettler Road
Uniontown, Ohio 44685
And
1106 Smith Ridge Road
New Canaan, Connecticut 06840

ASSOCIATION OF INDEPENDENT MANAGERS
20 Madison Avenue
Valhalla, New York 10595

AIM HEALTH PLANS
1145 Highbrook
Suite 411 and PH7
Akron, Ohio 43301
and
3465 South Arlington Road, #154
Akron, Ohio 44312

and
Post Office Box 1495
Toledo, Ohio 43603

INSURANCE RESOURCE GROUP, INC.
20 Madison Avenue
Valhalla, New York 10595

KEVIN R. DUNN
100 Eagle Rock Avenue
East Hanover, New Jersey 07936

WILLIAM WORTHY II
Post Office Box 462
Isle of Palms, South Carolina 29451

and

GARY L. KARNS, JR.
1618 Boettler Road
Uniontown, Ohio 44685
and
1145 Highbrook
Suite 411 and PH7
Akron, Ohio 43301

INTEGRATED INSURANCE MARKETING, INC.
Gary L.Karns, Jr.
1618 Boettler Road
Uniontown, Ohio 44685
and
1145 Highbrook
Suite 411 and PH7
Akron, Ohio 43301

CEO CLUB, INC. (a/k/a CHIEF EXECUTIVE OFFICERS CLUB, INC.)
Joseph Mancuso, President
15 Broad Street, Suite 1120
New York, New York 10005

HUDSON VALLEY CONSULTANTS, LLC (d/b/a CEO HEALTH CLUB BENEFITS)
Kevin R. Dunn, Managing Director
Richard Dunn
100 Eagle Rock Avenue
East Hanover, New Jersey 07936

RICHARD DUNN
100 Eagle Rock Avenue
East Hanover, New Jersey 07936

Post Office Box 611
Blythewood, South Carolina 29016

**STAR GROUP U.K./PHOENIX
INSURANCE COMPANY**
% Chief Financial Officer
200 East Gaines Street
Tallahassee, Florida 32399

COMMERCE BENEFITS GROUP
Thomas J. Patton, CEO
33479 Lake Road
Avon Lake, Ohio 44012

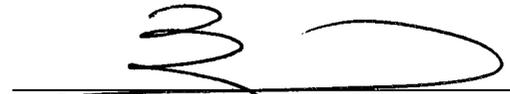
**NATIONAL ASSOCIATION OF
BUSINESS LEADERSHIP, LLC**
100 Eagle Rock Avenue, Suite 121
East Hanover, New Jersey 07936

**METROPOLITAN BUSINESS
ALLIANCE, LLC**
100 Eagle Rock Avenue, Suite 121
East Hanover, New Jersey 07936

DAVID L. CLARK
118 A Fulton Street
Post Office Box 138
New York, New York 10038
and
Post Office Box 74
Basking Ridge, New Jersey 07920

VIKING ADMINISTRATORS, LLC
% Kathleen D. Cauthen, Esquire
Post Office Box 171
Avon Lake, Ohio 44012
and
Post Office Box 611
Blythewood, South Carolina 29016

**WORLDWIDE FAMILY BENEFITS
ASSOCIATION**
8655 East Via de Ventura, #G200
Scottsdale, Arizona 85258


Rhoda K. Johnson
Assistant General Counsel
Office of Insurance Regulation
612 Larson Building
200 East Gaines Street
Tallahassee, Florida 32399-4206
(850) 413-4252