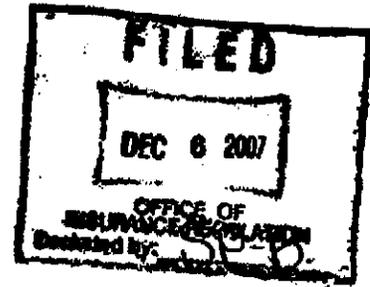




OFFICE OF INSURANCE REGULATION



KEVIN M. MCCARTY
COMMISSIONER

IN THE MATTER OF:

COVERDELL & COMPANY, INC.,
f/k/a BEST BENEFITS, INC.
2006 Market Conduct Examination

CASE NO.: 91465-07-CO

CONSENT ORDER

THIS CAUSE came on for consideration as the result of an agreement between COVERDELL & COMPANY, INC., f/k/a BEST BENEFITS, INC. (hereinafter referred to as "COVERDELL") and the OFFICE OF INSURANCE REGULATION (hereinafter referred to as the "OFFICE"). 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. COVERDELL is a foreign discount medical plan organization authorized to transact discount medical plan business in Florida and is subject to the jurisdiction and regulation of the OFFICE pursuant to the Chapter 636, Part II, Florida Statutes.
3. The OFFICE conducted a market conduct examination of COVERDELL in 2006 pursuant to Section 636.206, Florida Statutes. As a result, it has been determined that COVERDELL violated the following provisions of the Florida Insurance Code:

a. Section 636.214(3)(a), Florida Statutes – Failure to have the required provision in the network agreement to ensure agreements between the network and the provider comply with Section 636.214(2), Florida Statutes.

b. Section 636.214(3)(c), Florida Statutes – Failure to have a provision in a network agreement that requires the network to maintain an up-to-date list of its contracted providers and to provide that list on a monthly basis to the discount medical plan organization.

c. Section 636.204(1), Florida Statutes – Conducting business as a discount medical plan organization prior to licensure.

d. Section 636.216(1), Florida Statutes – Use of charges that have not been filed with the Office.

e. Section 636.212(1-5), Florida Statutes – Failure to contain the required disclosures on its website and in advertising materials.

f. Section 636.210(1)(a) & (b), Florida Statutes – Use of terms in advertisements that could reasonably mislead a person into believing the discount medical plan was health insurance.

4. COVERDELL expressly waives its right to a hearing in this matter, the making of Findings of Fact and Conclusions of Law by the OFFICE, and all further and/or other proceedings herein to which the parties may now or in the future be entitled, either by law or by rules of the OFFICE. COVERDELL hereby knowingly and voluntarily waives all rights to challenge or to contest this Order, in any forum now or in the future available, including the right to any administrative proceeding, circuit or federal court action, or any appeal.

5. COVERDELL agrees that upon the execution of this Consent Order it shall be subject to the following terms and conditions:

a. COVERDELL shall pay an administrative penalty of Five Thousand Dollars (\$5,000) and administrative costs of Three Thousand Dollars (\$3,000) on or before the 30th day after this Consent Order is executed.

b. COVERDELL shall, within 30 days of the execution of this Consent Order, provide to the OFFICE certification by an officer of the Company that the corrective actions outlined in the examination report have been completed.

6. COVERDELL is hereby placed on notice of the requirements of the above-referenced provisions of law and agrees that any future violations of these statutes by COVERDELL may be deemed willful, subjecting COVERDELL to appropriate penalties.

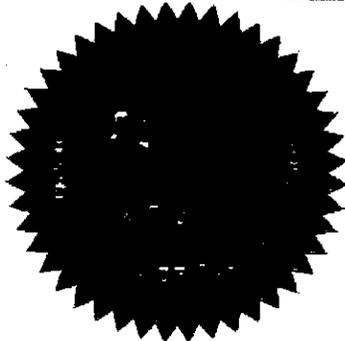
7. COVERDELL agrees that the failure to adhere to one or more of the above terms and conditions of this Consent Order shall constitute a violation of a lawful order of the OFFICE, and shall subject COVERDELL to such administrative action as the OFFICE may deem appropriate.

8. Except as noted above, each party to this action shall bear its own costs and attorney's fees.

THEREFORE, the agreement between COVERDELL and the OFFICE, the terms and conditions of which are set forth above, is APPROVED.

FURTHER, all terms and conditions above are hereby ORDERED.

DONE AND ORDERED this 6TH day of DECEMBER, 2007.



~~KEVIN M. McCARTY~~
Commissioner
Office of Insurance Regulation

By execution hereof, COVERDELL & COMPANY, INC., f/k/a BEST BENEFITS, INC. consents to entry of this Order, agrees without reservation to all of the above terms and conditions, and shall be bound by all provisions herein. The undersigned represents that he or she has the authority to bind COVERDELL & COMPANY, INC., f/k/a BEST BENEFITS, INC. to the terms and conditions of this Consent Order.

COVERDELL & COMPANY, INC.,
f/k/a BEST BENEFITS, INC.

Corporate Seal

By: _____

Title: CEO

Date: 11/16/07

STATE OF Illinois)
COUNTY OF Cook)

The foregoing instrument was acknowledged before me this 16th day of November, 2007,
by Vincent DiBenedetto as Officer for
(Name of person) (Type of authority.... e.g. officer, trustee, attorney in fact)
Coverdell & Company, Inc.
(Company name)

Personally Known or Produced Identification _____

Type of Identification Produced _____

Notarial Seal

(Signature of the Notary)

Danielle W. Powers

(Print, Type or Stamp Commissioned Name of Notary)

My Commission Expires: 09/20/2011



COPIES FURNISHED TO:

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