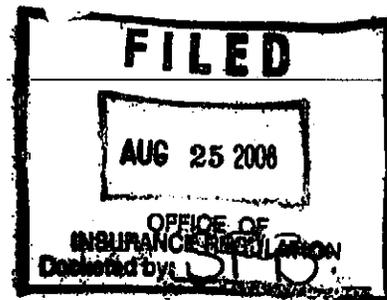




OFFICE OF INSURANCE REGULATION

KEVIN M. McCARTY
COMMISSIONER



IN THE MATTER OF:

VANTAGE AMERICA SOLUTIONS, INC.

CASE NO.: 94466-08

2006 Market Conduct Examination

CONSENT ORDER

THIS CAUSE came on for consideration upon the agreement between VANTAGE AMERICA SOLUTIONS, INC. (hereinafter referred to as "VANTAGE") 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. VANTAGE 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 Florida Insurance Code.
3. The OFFICE conducted a market conduct examination of VANTAGE in 2006 pursuant to Section 636.206, Florida Statutes. As a result of such examination, the OFFICE has

determined that VANTAGE has violated the following provisions of the Florida Insurance Code and the Florida Administrative Code:

- a. Section 636.214(3)(a), Florida Statutes – Failure to require the provider agreement between the discount medical plan organization and the provider network to contain a list of services and products to be provided at a discount; the amount or amounts of the discounts or, alternatively, a fee schedule which reflects the provider’s discounted rates; and that the provider will not charge members more than the discounted rates.
- b. Section 636.214(3)(c), Florida Statutes – Failure to require the provider agreement between the discount medical plan organization and the provider network to require 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 636.228(2), Florida Statutes – Failure of a marketing agreement to prohibit the marketer from using marketing materials, brochures, and discount cards without the approval in writing of the discount medical plan organization.
- d. Rule 69O-203.202(1)(g), Florida Administrative Code – Failure of a telephone script to properly advise members of cancellation conditions.
- e. Section 636.216(3), Florida Statutes – Use of forms that have not been filed with and approved by the Office.
- f. Section 636.204(1), Florida Statutes – Conducting business as a discount medical plan organization prior to licensure.

- g. Section 636.216(2), Florida Statutes – Failure to provide evidence of written agreement between the discount medical plan organization and the member specifying the benefits under the discount medical plan.
- h. Section 636.208(2), Florida Statutes – Failure to make a full refund to members who cancelled their membership within the first 30 days after the effective date of their enrollment.
- i. Section 636.226, Florida Statutes – Failure to maintain an up-to-date and complete list of providers on its website.
- j. Section 636.212(1) – (5), Florida Statutes – Failure to contain the required disclosures on the first page of the website, advertisements, marketing materials, or brochures relating to the discount medical plan.

4. VANTAGE 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 other proceedings herein to which the parties may now or in the future be entitled by law or by rules of the OFFICE. VANTAGE 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. VANTAGE agrees that upon the execution of this Consent Order it shall be subject to the following terms and conditions:

- a. VANTAGE shall pay an administrative penalty of Seven Thousand Five Hundred Dollars (\$7,500) and administrative costs of Three Thousand Dollars (\$3,000) on or before the 30th day after this Consent Order is executed.

b. VANTAGE shall, within 30 days of the execution of this Consent Order,
provide to the OFFICE a certification signed by an officer of the Company that
the corrective actions outlined in the examination report have been completed.
The certification shall include a detailed list of all fees returned, itemized by
member name, member number, and the amount refunded.

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

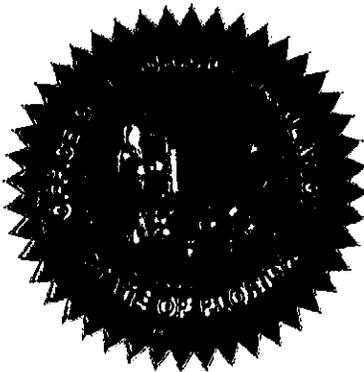
7. VANTAGE agrees that the failure to adhere to one or more of the terms and
conditions of this Consent Order shall constitute a violation of a lawful order of the OFFICE, and
shall subject VANTAGE to such administrative action as the OFFICE may deem appropriate.

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

THEREFORE, the agreement between VANTAGE 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 25TH day of AUGUST 2008.



KEVIN M. McCARTY
Commissioner
Office of Insurance Regulation

By execution hereof, VANTAGE AMERICA SOLUTIONS, 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 VANTAGE AMERICA SOLUTIONS, INC. to the terms and conditions of this Consent Order.

VANTAGE AMERICA SOLUTIONS, INC.

Corporate Seal

By: _____

Title: President

Date: 8/11/08

STATE OF Illinois)
COUNTY OF Cook)

The foregoing instrument was acknowledged before me this 11 day of August, 2008,
by Jrffrey Burman as President for
(Name of person) (Type of authority.... e.g. officer, trustee, attorney in fact)
Vantage America Solutions, Inc.
(Company name)

Personally Known X or Produced Identification _____

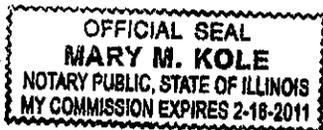
Type of Identification Produced _____

(Signature of the Notary)

Notarial Seal

Mary M. Kole
(Print, Type or Stamp Commissioned Name of Notary)

My Commission Expires: 2-16-2011



COPIES-FURNISHED-TO:

**Mr. Jeffrey Burman, President
Vantage America Solutions, Inc.
1275 Milwaukee Ave.
Glenview, IL 60025-2463**

**Jim Bennett, Director
Market Investigations
Office of Insurance Regulation
200 E. Gaines Street
Tallahassee, FL 32399-4210**

**Sharlee Hobbs Edwards, Esq.
Assistant General Counsel
Legal Services Office
Office of Insurance Regulation
200 E. Gaines Street
Tallahassee, FL 32399-4206**