

FILED

FEB 11 2026

INSURANCE REGULATION
Docketed by: A.M.V.



OFFICE OF INSURANCE REGULATION

MICHAEL YAWORSKY
COMMISSIONER

IN THE MATTER OF:

THIN BLUE LINE BENEFITS
ASSOCIATION HOLDINGS, LLC;

Index: OIR 2026-9

CASE NO.: 402050-25

THIN BLUE LINE BENEFITS
ASSOCIATION, LLC.;

THIN BLUE LINE BENEFITS, INC.

_____/

CEASE AND DESIST COMPLAINT

The STATE OF FLORIDA, OFFICE OF INSURANCE REGULATION ("the OFFICE") files this cease and desist complaint against Thin Blue Line Benefits Association Holdings, LLC, Thin Blue Line Benefits Association, LLC, and Thin Blue Line Benefits, Inc. ("THIN BLUE LINE"). The Office alleges the following basis for this complaint:

Background

1. THIN BLUE LINE unlawfully issued unauthorized benefit offerings to retired law enforcement and fire fighter personnel ("first responders"). First responders often are eligible to retire several years before becoming eligible for Medicare, resulting in a distinct period during which they lack access to Medicare coverage (the "gap period"). THIN BLUE LINE deliberately

exploited this gap period, marketing unlicensed insurance products to retired first responders who have limited opportunity for affordable coverage during the gap period.¹ *See Ex. A*, at 1-11. THIN BLUE LINE further misrepresented that its products were compliant with applicable laws and regulations. They were not.

2. Florida Statutes delegate authority to the OFFICE to authorize insurance products through rigorous application processes. These processes ensure the OFFICE has oversight over companies to ensure solvency, among other things. § 20.121, Fla. Stat. (2025). By failing to seek authorization to operate in the state of Florida, THIN BLUE LINE flouted Florida law and disregarded the Legislative protections guaranteed to Florida consumers.

3. THIN BLUE LINE canceled or nonrenewed all its Florida consumers on or before August 31, 2025, forcing dozens of retired first responders into the individual market for health insurance. *See Ex. A*, at 12-17, 23. Rates in the individual health insurance market in Florida are, in certain instances, up over 30%. This means that first responders and their families, whom THIN BLUE LINE led to believe would have coverage throughout the gap period, must seek health insurance in the individual market well above what they expected to pay. This will result in first responders facing budget strains that may limit their healthcare access.

4. THIN BLUE LINE utilized partnerships with national, state, and local first responder organizations, including the Fraternal Order of Police, to target retired first responders.² *See Ex. A*, at 3-4.

¹ Katie Wilcox, 'Cease and Desist': Thin Blue Line Benefits Association must immediately stop operations in Arizona, 12News (updated July 18, 2025, at 6:14 pm MDT), Retrieved from <https://www.12news.com/article/news/local/arizona/cease-and-desist-thin-blue-line-benefits-association-must-immediately-stop-operations-arizona/75-3cef4964-f66e-403a-9fe9-291f3671fe0e>.

² Katie Wilcox, Major police association breaks ties with health care company regulators now accuse of misleading retired first responders, 12News (updated Jul 23, 2025, at 8:18 pm MDT), Retrieved from <https://www.12news.com/article/news/health/national-fraternal-order-police-terminated-agreement-with-thin-blue-line-benefits/75-6463d79a-96b0-4fb0-ae5b-bc8847450e22>.

5. THIN BLUE LINE operated a website under the web address thinbluelinebenefits.com. *See Ex. A*, at 1-11. The primary purpose of this website was to advertise and market insurance options to retired first responders throughout the United States.³

6. Since July 2025, at least three different jurisdictions have ordered THIN BLUE LINE to cease acting as an illegal insurer. Multiple sources report that THIN BLUE LINE failed to properly pay claims, leaving consumers with hundreds of thousands of dollars in bills.⁴

7. On July 16, 2025, the Arizona Department of Insurance and Financial Institutions issued a Cease and Desist against THIN BLUE LINE based upon findings that THIN BLUE LINE engaged in the unauthorized transaction of insurance and failed to pay claims for medical services. As of June 2025, THIN BLUE LINE had more than 4,600 Arizona residents insured with a total collected premium of over \$5.8 million.⁵ *See Ex. B*, at 1-9.

8. On July 25, 2025, the Franklin County Court of Common Pleas for the State of Ohio issued a Temporary Restraining Order against THIN BLUE LINE. The restraining order prevents THIN BLUE LINE from acting as an insurer in the state of Ohio without proper licensure

³ Although no longer active, an archived version of the website exists. *Web Achieve Apr. 25, 2025* <https://thinbluelinebenefits.com/>, Wayback Machine, <https://web.archive.org/web/20250425203553/https://thinbluelinebenefits.com/> (Dec. 17, 2025).

⁴ In Ohio, retired firefighter reported over \$300,000 in unpaid claims, and retired deputy sheriff reported over \$150,000. *See Sarah Buduson, Not just Ohio. Another state has an 'active and ongoing' investigation into Thin Blue Line Benefits*, News 5 Cleveland, Sep. 19, 2025. Retrieved from <https://www.news5cleveland.com/news/local-news/we-follow-through/not-just-ohio-another-state-has-an-active-and-ongoing-investigation-into-thin-blue-line-benefits> (Dec. 17, 2025). A retired police sergeant from Phoenix Arizona reported that he owed \$415,000 in unpaid claims due to Thin Blue Line failing to pay. *See Amy Cutler and Cody Lillich, Arizona AG reaches deal with insurance company over unpaid first responder claims*; Arizona's Family, Dec. 11, 2025. Retrieved from <https://www.azfamily.com/2025/12/12/arizona-ag-reaches-deal-with-insurance-company-over-unpaid-first-responder-claims/> (Dec. 17, 2025).

⁵ In the Matter of Unlicensed Activity Thin Blue Line Benefits Associations Holdings LLC; Thin Blue Line Benefits Association LLC; Thin Blue Line Benefits, Inc; Anna Reed, President and CEO, and Guineth A. Reed, Manager, 25A-089-INS (State of Arizona Department of Insurance and Financial Institutions) (July 16, 2025). Retrieved from <https://difi.az.gov/sites/default/files/250089.pdf> (Dec. 17, 2025).

or authority. An Ohio court subsequently placed THIN BLUE LINE in a court ordered conservatorship under the Ohio Superintendent of Insurance.⁶ *See Ex. B*, at 10-23.

9. On November 19, 2025, the Office of the Insurance Commissioner for the State of Washington ordered THIN BLUE LINE to cease and desist from, among other things, engaging in transacting the unauthorized business of insurance.⁷ *See Ex. B*, 24-30.

Organizational Structure of THIN BLUE LINE

10. THIN BLUE LINE BENEFITS ASSOCIATION HOLDINGS, LLC is a Texas entity registered with the Texas Secretary of State on May 26, 2020. The entity's current registration status with the Texas Secretary of State is active. Anna Reed has served as the Registered Agent, the CEO, and the President of the entity.

11. THIN BLUE LINE BENEFITS ASSOCIATION, LLC is a Texas entity registered with the Texas Secretary of State on June 26, 2020. The entity's current registration status with the Texas Secretary of State is inactive. Guineth A. Reed is the Registered Agent and the Manager for the entity.

12. THIN BLUE LINE BENEFITS, INC. is a Texas entity registered with the Texas Secretary of State on August 12, 2015. The entity's current registration status with the Texas Secretary of State is active. Guineth A. Reed is the Registered Agent and President for the entity.

⁶ *Judith L. French, Superintendent, Ohio Department of Insurance v. Thin Blue Line Benefits Association, LLC, et al.*, 25CV-5302 (Ohio CP. 2025). Retrieved from <https://www.ohioattorneygeneral.gov/Files/Briefing-Room/News-Releases/thin-blue-line-benefits-association-holdings.aspx> (Dec. 17, 2025).

⁷ In the Matter of Thin Blue Line Benefits Association LLC; Thin Blue Line Benefits Associations Holdings LLC; Thin Blue Line Benefits, Inc; Anna Reed, and Guineth A. Reed, 25-0181 (State of Washington, Office of the Insurance Commissioner) (Nov. 19, 2025). Retrieved from fortress.wa.gov/oic/consumertoolkit/Orders/OrderProfile.aspx?OrderNumber=mIeuJ2xe1W1vovi%2fM2T9fg%253D%253D (Dec. 17, 2025).

13. Throughout this complaint, THIN BLUE LINE BENEFITS ASSOCIATION HOLDINGS, LLC, THIN BLUE LINE BENEFITS ASSOCIATION, LLC, and THIN BLUE LINE BENEFITS, INC, are collectively referred to as “THIN BLUE LINE.”

THIN BLUE LINE Violated Florida Law

14. On December 3, 2025, the OFFICE served an Emergency Order to Cease and Desist (“Emergency Order”) on THIN BLUE LINE pursuant to section 624.310(3)(f), Florida Statutes.⁸ The OFFICE issued the Emergency Order based on findings that THIN BLUE LINE’s illegal conduct may cause substantial prejudice to Florida consumers and members of the public. Specifically, Florida consumers and members of the public are in jeopardy of claims being unpaid or paid on an untimely basis in violation of Florida law. The Emergency Order was narrowly tailored to provide immediate corrective action to Florida consumers and require THIN BLUE LINE to immediately cease and desist from engaging as an unlicensed or unauthorized insurer.

15. The Emergency Order required THIN BLUE LINE, among other things, to provide notice to any affected Florida consumer, via a copy of the Emergency Order, that THIN BLUE LINE was not a properly licensed Florida insurer and provide the OFFICE, as well as the Department of Financial Services, a copy of every insurance contract entered with a Florida resident or consumer. The purpose of this corrective action was to provide the OFFICE with sufficient information to identify potential consumer impact and provide proper notice to consumers. The Emergency Order provided THIN BLUE LINE thirty (30) days to comply with these terms. As of January 20, 2026, THIN BLUE LINE has failed to comply with the above terms of the Emergency Order.⁹

⁸ All statutory citations contained herein refer to Florida Statutes (2025), unless otherwise noted.

⁹ Although THIN BLUE LINE was entitled to seek immediate appellate review of the Emergency Order, the deadline to seek such appellate reviewed has passed. *See* 120.569(2)(n), Florida Statutes, Rule 28-106.501, Florida Administrative Code, and Rules 9.190 and 9.110, Florida Rules of Appellate Procedure.

16. On December 8, 2025, THIN BLUE LINE provided a response to the Emergency Order. THIN BLUE LINE's response alleged that THIN BLUE LINE had a total of sixty-six Florida members. THIN BLUE LINE further alleged that THIN BLUE LINE ceased marketing and selling of benefits to Florida consumers in December of 2024. THIN BLUE LINE alleges that all business in Florida ceased as of August 31, 2025. *See Ex. A*, at 12-13.

17. Between January 1, 2023, and August 31, 2025, THIN BLUE LINE illegally transacted or administered dozens of contracts for health insurance coverage to retired first responders and their families in Florida. Dozens of Florida consumers signed membership agreements that obligated the consumers to pay monthly premiums, co-pays, co-insurance, and other financial requirements for the coverage of their claim. THIN BLUE LINE charged thousands of dollars for each of these agreements.¹⁰

18. THIN BLUE LINE is not licensed or authorized to act as an insurer in the state of Florida.

19. THIN BLUE LINE is not licensed or authorized to directly, or indirectly, transact insurance in the state of Florida.

20. THIN BLUE LINE violated section 624.401(1), Florida Statutes, by acting as an insurer, or directly or indirectly transacting insurance, without a license or certificate of authority.

21. THIN BLUE LINE violated section 624.310(3)(a)4, Florida Statutes, by failing comply with all terms of the Emergency Order served on December 3, 2025.

[Continued on Following Page]

¹⁰ For example, one member paid a total premium of over twelve thousand dollars over the course of nine months. *See Ex. A*, at 18-24.

Conclusions of Law

Jurisdiction

22. Section 20.121(3)(a)l, Florida Statutes, provides, in part, that the OFFICE shall be responsible for all activities concerning insurers and other risk bearing entities, including licensing, rates, policy forms, market conduct, and claims.

23. Section 624.01 provides that chapters 624-632, 634, 635, 636, 641-42, 648, and 651 constitute the "Florida Insurance Code."

24. The OFFICE has jurisdiction over the subject matter hereof and parties herein pursuant to sections 624.307, 624.310, 624.401, and 634.03 of the Florida Statutes.

Definitions

25. Section 624.04 defines "person" to include "an individual, insurer, company, association, organization, Lloyds, society, reciprocal insurer or interinsurance exchange, partnership, syndicate, business trust, corporation, agent, general agent, broker, service representative, adjuster, and every legal entity."

26. Section 624.401(1) states a person may not "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."

27. Section 624.02 defines "insurance" as "a contract whereby one undertakes to indemnify another or pay or allow a specified amount or a determinable benefit upon determinable contingencies."

28. Section 624.03 defines "insurer" to include "every person engaged as indemnitor, surety, or contractor in the business of entering into contracts of insurance or of annuity."

29. Section 624.09(1) defines an “authorized insurer” as one duly authorized by a subsisting certificate of authority issued by the office to transact insurance in this state. Section 624.09(2), Florida Statutes, defines an “unauthorized insurer” as one not so authorized under the previously referenced subsection.

30. Section 624.10 defines “transact” in relation to the insurance code to include the solicitation or inducement, preliminary negotiation, effectuation of a contract of insurance, and any transaction of matters subsequent to effectuation of a contract of insurance and arising out of it.

31. THIN BLUE LINE’s activities do not fall within the exceptions, exclusions or exemptions provided in any provision of the Florida Statutes or federal law.

THE OFFICE has Authority To issue a Cease and Desist Complaint and Final Order

32. THIN BLUE LINE is an unlicensed person subject to the regulatory jurisdiction of the OFFICE pursuant to sections 624.04, 627.828, and 20.121(3)(a)l, of the Florida Statutes.

33. In addition to licensees and affiliated parties, section 624.310 applies to *unlicensed persons* subject to the regulatory jurisdiction of the OFFICE. *See* § 624.310(2)(a), Fla. Stat. (emphasis added). Section 624.310(3) authorizes the OFFICE to serve a complaint upon any unlicensed person whenever the OFFICE has reasonable cause to believe that the party is engaging or has engaged in conduct that is:

- a. An act that demonstrates a lack of fitness or trustworthiness to engage in the business of insurance, is hazardous to the insurance buying public, or constitutes business operations that are a detriment to policyholders, stockholders, investors, creditors, or the public;
- b. A violation of any provision of the Florida Insurance Code;
- c. A violation of any rule of the department or commission;
- d. A violation of any order of the department or office; or
- e. A breach of any written agreement with the department or office.

34. THIN BLUE LINE’s actions demonstrate a lack of fitness or trustworthiness to engage in the business of insurance. THIN BLUE LINE’s operations remain a hazard to the

insurance buying public and business operations that are a detriment to policyholders, stockholders, investors, creditors, or the public. THIN BLUE LINE illegally operated as an insurer and transacted policies for insurances in violation of section 624.401(1). Finally, THIN BLUE LINE failed to comply with the terms of an Emergency Order served on December 3, 2025, in violation of section 624.310(3)(a)4. Therefore, a cease and desist complaint is appropriate.

Notice of Statutory Penalties

35. The OFFICE will enter a Cease and Desist Final Order in this matter. Pursuant to section 624.310(3), the OFFICE may order THIN BLUE LINE to cease and desist acting as an insurance company or transacting insurance in the State of Florida without a license or certificate of authority.

36. Pursuant to section 624.310(3)(c), the Cease and Desist Final Order may require THIN BLUE LINE to take corrective action to remedy the effects of past improper conduct and assure future compliance. Such corrective action may include requirements that THIN BLUE LINE comply with all requirements of the Insurance Code, cease from engaging in marketing or advertising, provide appropriate refunds to Florida consumers, and continue to respond to and fulfill claims arising out of policies involving Florida consumers.

[Continued on Following Page]

37. Pursuant to sections 624.310(5) and 624.4211, the OFFICE may impose an administrative fine against THIN BLUE LINE. For each *non-willful* violation, the OFFICE may impose an administrative fine of twelve thousand five hundred dollars, up to an aggregate amount of \$50,000 for all *non-willful* violations arising out of the same action. For each *willful* violation, the OFFICE may impose an administrative fine of one hundred thousand dollars, up to an aggregate amount of \$500,000 for all knowing and *willful* violations arising out of the same action. Additionally, the OFFICE may order THIN BLUE LINE to provide restitution to all persons affected by THIN BLUE LINE's violation of the Insurance Code.

DONE and ORDERED this 11 day of February, 2026.



A handwritten signature in blue ink, appearing to read "Michael Yaworsky", written over a horizontal line.

MICHAEL YAWORSKY
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 with 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 has been sent to Harry Halley at Harry.Halley@myfloridacfo.com on behalf of the Chief Financial Officer pursuant to section's 626.906 and 626.907, Florida Statutes, this 11th of February 2026. Respondent's last known principal place of business and contact information are as follows:

THIN BLUE LINE BENEFITS
ASSOCIATION HOLDINGS, LLC
208 Fulton Ave,
Rockport, Texas 78382

Anna Reed, Registered Agent
Thin Blue Line Benefits Association
Holdings LLC.
208 Fulton Ave,
Rockport, Texas, 78382
anna@thinbluelinebenefits.com

THIN BLUE LINE BENEFITS
ASSOCIATION, LLC
208 Fulton Ave.,
Rockport, Texas 78382

Guineth A. Reed, Registered Agent
Thin Blue Line Benefits Association, LLC
208 Fulton Ave.,
Rockport, Texas 78382

THIN BLUE LINE BENEFITS, INC.
208 Fulton Ave.,
Rockport, Texas 78382

Guineth A. Reed, Registered Agent
Thin Blue Line Benefits, Inc.
208 Fulton Ave.,
Rockport, Texas 78382

Mark A. Weitz, Esq.
Counsel for Thin Blue Line
MWeitz@Weitzmorgan.com
1250 S Capital of Texas Highway
Building 3, Suite 400
Austin, Texas – 78746

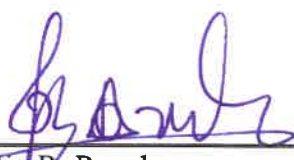
X 
Justin R. Ravelo
Florida Bar No. 1022417
Assistant General Counsel
Florida Office of Insurance Regulation
200 E. Gaines Street
Tallahassee, Florida 32399
Telephone: (850) 413-5147
Email: Justin.Ravelo@flor.com

EXHIBIT A**JOIN THIN BLUE LINE BENEFITS ASSOCIATION**

Thin Blue Line Benefits Association is a member only organization exclusively serving America's First Responders. Join thousands of law enforcement and fire personnel (active and retired) in every state in America. There is no cost for membership

Memberships is free and opens up a wide array of incredible benefits.

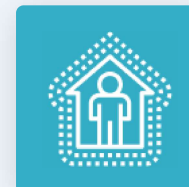
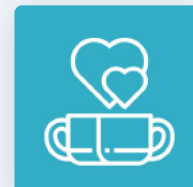
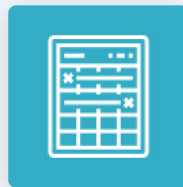


EXHIBIT A

**PRE-65 HEALTH
INSURANCE FOR
RETIRED MEMBERS**

**RETIREMENT
PLANNING**

**FIRST RESPONDER
COFFEE**

**HOME WARRANTY
PROGRAM**

Of all of our great benefit offerings, Pre-65 Healthcare is our flagship benefit.

We have solved the problem that many first responders experience. Public safety professionals have an earlier retirement than the general population, leaving them in a longer medicare gap until they reach age 65, with very few choices and very high costs. Well, not anymore. We have something specially made just for you!

Custom made high quality health care specifically created for you. This is not a boxed plan pulled off of a shelf and presented as custom made. It truly is!

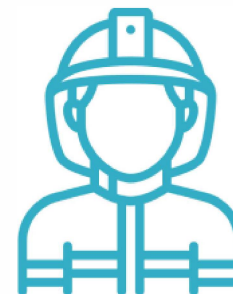
High quality, comprehensive healthcare solutions just for our members!

Join Thin Blue Benefits Association for free with no obligation and open the door to amazing benefits including this one of a kind health care plan.



**I AM/WAS A
POLICE OFFICER**

(or civilian law enforcement support personnel who worked directly for a law enforcement agency)



**I AM/WAS A
FIREFIGHTER**

(or fire department civilian support personnel.)

EXHIBIT A

If you are a retired law enforcement officer or civilian support personnel who worked directly for a law enforcement agency, you are eligible to obtain Thin Blue Line Benefits Insurance. FOP Membership is required.

[LEARN MORE](#)

If you are a retired firefighter or civilian support personnel who worked directly for a fire department, you are eligible to obtain Thin Blue Line Benefits Insurance.

[LEARN MORE](#)

PROUDLY PARTNERED WITH



CLIENT TESTIMONIALS

"The people at Thin Blue Line are great to work with. They saved me over \$600. a month on my individual health care!"

Tim P

South Carolina. Calif Deputy Sheriff, Ret.

EXHIBIT A

PRE-65 RETIREE HEALTH INSURANCE

Exclusively marketed by the National Fraternal Order of Police

- Three incredible PPO health insurance plans
- Nationwide network access using a Provider Open Access model. We've done away with our limited network.
- Spouse and family plans available
- Very competitive rates exclusive to FOP

Eligibility:

- FOP Retirees in good standing
- Non FOP law enforcement retirees under age 65 will need to join the FOP as a retired member and have full access to benefits (contact your local or state lodge)
- Retired law enforcement support personnel who worked directly for a law enforcement agency and join the FOP
- Join Thin Blue Line Benefits Association (no charge) prior to purchase of benefits (See form below)

To join the FOP, please contact your local or state lodge. [click here](#)



**NATIONAL
FOP**

EXHIBIT A



JOIN NOW FOR ABSOLUTELY NO COST AND NO OBLIGATION

THIN BLUE LINE BENEFITS ASSOCIATION

BENEFITS:

- ✓ Healthcare
- ✓ Travel
- ✓ Home Warranty Program
- ✓ First Responder Coffee
- ✓ Financial Cop
- ✓ Retirement Planning,
- ✓ Investments & Wealth Management exclusive to first responders
- ✓ Private Functional Health
- ✓ Consultations

EXHIBIT A



B E N E F I T S

We have a wide breadth of experience over 30 years providing financial services.

CONTACT INFORMATION

✉ INFO@THINBLUELINEBENEFITS.COM

☎ 866-921-BLUE(2583) / M-F 8:00 AM - 5:00 PM

LOCATION

THIN BLUE LINE BENEFITS ASSOCIATION

📍 Main Office
1415 Ranch Rd 620 S,
Suite 201
Lakeway, TX 78734

Mailing Address (for correspondence and HELPS Act payments)

📍 PO Box 341742 Lakeway, TX 78734

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[TERMS & CONDITIONS](#) | [PRIVACY POLICY](#)

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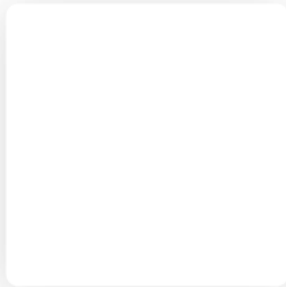


EXHIBIT A

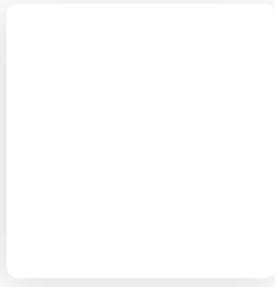
JOIN THIN BLUE LINE BENEFITS ASSOCIATION

Thin Blue Line Benefits Association is a member only organization exclusively serving America's First Responders. Join thousands of law enforcement and fire personnel (active and retired) in every state in America. There is no cost for membership

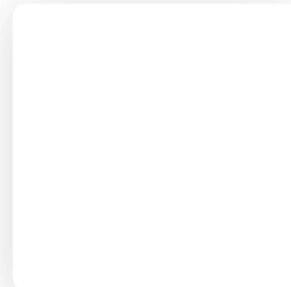
Memberships is free and opens up a wide array of incredible benefits.



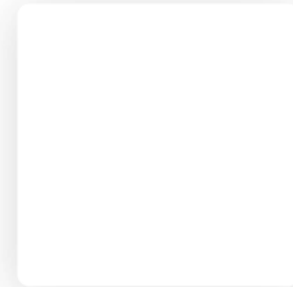
**PRE 65 RETIREE
HEALTH
INSURANCE**



**RETIREMENT
PLANNING**



**FIRST RESPONDER
COFFEE**



**HOME WARRANTY
PROGRAM**



EXHIBIT A

The Wayback Machine - <https://web.archive.org/web/20250416160151/https://thinbluelinebenefits.com/police/>



THIN BLUE LINE BENEFITS
ASSOCIATION

EXHIBIT A

Prescription Drugs and Rx Formularies

Thin Blue Line Benefits Association provides a fully accessible prescription drug benefit for each of our plans. Coverage levels vary between the plans as seen in the plan comparison. Drug (Rx) formularies are constantly changing as well as drug pricing across all carriers in the industry. Due to the current unsteady market, prescriptions are moving in and out of large national formularies in a more rapid fashion. This has had an impact on plan formularies and pharmacies in every region.

These rapid changes in the core prescription drug market will mean that a drug cost can vary greatly between pharmacies and thereby impact co-pay coverages.

Current Thin Blue Line Benefits policyholders with prescription drug questions should contact Orchestra Rx. Their contact information is in your portal and on your insurance card. Those that are not yet current policyholders and have questions may contact Thin Blue Line Benefits at info@thinbluelinebenefits.com.

[PURCHASE/ENROLL HERE](#)

DENTAL/VISION

PPO Dental Insurance Plan
bundled with Vision exclusively
for our Thin Blue Line Benefits
members. Nationwide

EXHIBIT A



HELPS Act
Information

I AM RETIRED LAW ENFORCEMENT AND AM 65 YEARS OLD OR OVER.

What is available for me?

The National FOP offers members Medicare through Aetna.

A spouse who is covered on your Thin Blue Line Benefits policy who is under age 65, may remain on the policy as an individual.

[CLICK HERE TO LEARN MORE](#)

EXHIBIT A

JOIN NOW FOR ABSOLUTELY NO COST AND NO OBLIGATION

THIN BLUE LINE BENEFITS ASSOCIATION

BENEFITS:

- ✓ Healthcare
- ✓ Travel
- ✓ Home Warranty Program
- ✓ First Responder Coffee
- ✓ Financial Cop
- ✓ Retirement Planning,
- ✓ Investments & Wealth Management exclusive to first responders
- ✓ Private Functional Health
- ✓ Consultations

EXHIBIT A

WEITZ | MORGAN

Government Contracts – Healthcare – Aesthetics – Insurance – Litigation

December 8, 2025

Via e-mail Transmission

Via e-mail Transmission

Justin.Ravelo@florir.com

Justin Ravelo

Assistant General Counsel

Florida Office of Insurance Regulation

200 e. Gaines Street

Tallahassee, FL 32399

Re: Thin Blue Line Benefits, Inc.et. al

RESPONSE TO CEASE-AND-DESIST ORDER DATED DECEMBER 2, 2025

Dear Mr. Ravelo,

My name is Mark Weitz. I represent Thin Blue Line Benefits, Inc. Thin Blue Lines Association Holdings, LLC and Thin Blue Line Association, LLC. This letter is in response to the above referenced cease and desist order.

First, none of the entities I represent have done any business in Florida since August 31, 2025. They have not marketed and sold benefits in the state since the end of December 2024. We have a total of sixty-six Florida members. Why you felt the need to suddenly issue and cease and deist order after all business had been concluded is unclear except based on a reading of the order, it would appear Florida has done no real research of its own, but from what we know that is not the case.

Apparently, a Florida insurance investigator, Gennaro Scarfogliero, reached out to Peter David, the owner of Thin Blue Line's third-party administrator, EOB TPA, LLC. Mr. David then reached out to Anna Reed, owner of Thin Blue Line and her counsel, Adrian Frazer in Dallas. Adrian called Mr. Scarfogliero who indicated he was not investigating Thin Blue Line but rather EOB TPA. He told Adrian he had no issues with how Thin Blue Line was doing business in Florida. Mr. David then reached out to Mr. Scarfogliero and he told Mr. David that EOB was not the subject of any investigation, but rather Thin Blue Line. He then told EOB it had no issues with Thin Blue Line and that "everything looked good and he would be recommending the case be closed."

Everything in your C&D order is based on what Arizona did and what is going on in Ohio. The order sets out proceedings in other starts and then concludes Thin Blue Line could not legally operate on an association basis under the federal ERISA statute. It is clear Florida has not litigated that issue, nor as a matter of fact have either Ohio or Arizona. In both those states Thin Blue Line's authority to transact business is an unresolved issue. The Ohio matter is not even set for trial until July 2026 and Arizona has no setting. Consistent with the Florida order it does not appear either jurisdiction has researched the issue.

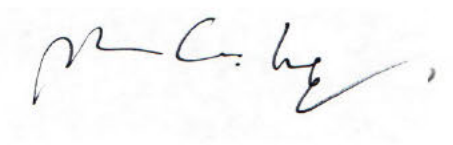
EXHIBIT A

What is troubling about the Florida order is that it speaks in terms of protecting the public and yet reflects a complete ignorance of the facts. First, as pointed out in the first paragraph, Thin Blue Line is no longer actively doing business in Florida. Your investigator would have known this. That would have been an important fact to have included in your order. Second, if there was really a concern you would have done some research on the insolvency issue. Not only is Thin Blue Line not insolvent, but it has timely paid all sixty-six of its Florida member claims. You attach pleadings from other jurisdictions where you have no real idea of what is transpiring and yet your cease and desist is not supported by one single Florida member complaint. That is in great part because despite the unfounded allegation in your cease-and-desist order, Thin Blue Line has met all its obligations in Florida.

There will be no need to continue this proceeding. Thin Blue Line is no longer actively in Florida. I would have been nice if the C&D order reflected the actual facts as developed by your investigator because the circumstances you allege in the order do not prevail in Florida. The sense of urgency recited in your order does not exist. Should you have any questions or wish to discuss this in greater detail please contact me at the number and e-mail below.

Sincerely,

WEITZ MORGAN PLLC

A handwritten signature in black ink, appearing to read "Mark A. Weitz", is written over a light gray rectangular background.

Mark A. Weitz, Partner

T: 512-657-1849

E: mweitz@weitzmorgan.com

EXHIBIT A



(<https://fop.net/>)

FRATERNAL ORDER OF POLICE

THE VOICE OF OUR NATION'S
LAW ENFORCEMENT OFFICERS

Q (/?s=)

News Alert

Attention Thin Blue Line Customers

July 25, 2025

Dear Member,

The National FOP is continuing to monitor the issues with Thin Blue Line Benefits (TBL). We are sharing all information in real time regarding the processing of claims and updates.

Although we have terminated our relationship with TBL, General Counsel and I are in communication with TBL regarding outstanding claims. Our last update posted on the NFOP website was provided TBL legal counsel.

Per our conversation with TBL members enrolled in the TBL plans will be able to enroll in ACA medical plans as a part of a Special Enrollment Period to avoid a loss in coverage . We are continuing to follow up with TBL to help and provide guidance during this process.

Please continue to visit the NFOP website for updates. We have been advised that TBL will have updates on all claims by August 1.

Thank you for your patience as we work through this transition. We will follow up next week with additional information.

Faternally,

Patrick Yoes, National President

Message from Thin Blue Line

The Ohio Attorney General's Office filed suit against Thin Blue Line Benefits Association LLC and Thin Blue Line Benefits Association Holdings LLC (collectively "Thin Blue Line") on June 24, 2025. As a result of the suit, the Ohio Department of Insurance has been appointed as conservator to oversee

EXHIBIT A

the transaction of business by Thin Blue Line during the pendency of the matter.

While Thin Blue Line continues to pay outstanding claims for policyholders—and is diligently facilitating ongoing health care services for policyholders—some claims payments may be delayed due to complications relating to claims systems issues, the transition to a new third-party administrator, and with receiving claims information.

Thin Blue Line has paid all claims received through June 1, 2025. If you have outstanding claims, please contact your provider and request that they rebill your claim by sending to one of the following.

info@thinbluelinebenefits.com (<mailto:info@thinbluelinebenefits.com>)

Fax 360-899-4475

EOB TPA LLC

PO Box 97

New Port Richey, FL 34656

Ohio Providers: ohioclaims@eobtpa.com (<mailto:ohioclaims@eobtpa.com>)

Do not submit your MyChart or bill you received. That is not a claim, and we cannot use that to process your claims.

Thin Blue Line is cooperating with the Ohio Attorney General and the Ohio Department of Insurance to accomplish the shared goal of ensuring policyholders continue to receive the health care they need and that health care providers receive prompt payment for rendered services to policyholders.

The plans offered by Thin Blue Line will no longer be offered as of August 31, 2025, at the end of the current plan year. At that time, Thin Blue Line will continue to process and pay claims incurred during the plan year but will not offer future health care coverage for policyholders.

Thank you,

Thin Blue Line Benefits Association

EXHIBIT A



FRATERNAL ORDER OF POLICE

National Headquarters

701 Marriott Drive
Nashville, TN 37214

Toll-free (800) 451-2711
Office (615) 399-0900

Sitemap (<https://fop.net/site-map/>)

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WELCOME

HEALTH PROGRAMS

Getting started:

We are excited you have chosen to pursue our affordable quality healthcare options. In efforts to simplify this process we ask that you complete the agreement and ACH bank authorization thru this secure document management portal.

Thank you for the opportunity to earn your business as a strategic solution for better health.

Thin Blue Line Benefits Association



Date: 11-13-2024

New Member Agreement

Member Information:

Full Name: [REDACTED]

Mailing Address: [REDACTED]

Physical Address: [REDACTED]

Contact Phone Number: [REDACTED]

Email: [REDACTED]

Thin Blue Line Benefits Association Health Program

PRIME PLAN
ULTRA PLAN
VALUE PLAN
DENTAL/VISION PLAN

Thin Blue Line Benefits Association Health Program Pricing

Please refer to Appendix B for current program pricing.

General Terms and Conditions

1. Monthly premiums are due by the 1st of each month.
2. Member shall make payment via ACH authorization. Please complete the ACH Authorization Form as set forth in Exhibit A in-order to complete this Agreement.
3. Members and their dependents enrolled by the 20th of the month at midnight will be eligible to start utilizing the program benefits the first day of the month following enrollment unless otherwise specified.

I, the undersigned, agree to the terms set forth above enroll the Thin Blue Line Benefits Association Program:



Disclosure and Disclaimers

Thin Blue Line Benefits Association ("TBL") does not provide medical advice. All Materials and information available on or through this program or www.thinbluelinebenefits.com are for general informational purposes only. The Materials are not intended to be a substitute for professional medical advice, diagnosis or treatment. You are encouraged to review any information contained on or through this program carefully and to confer with your doctor, healthcare provider or other healthcare professional. TBL is not responsible or liable for any advice, course of treatment, diagnosis or any other information, services or products that you obtain through TBL. Confirm all medical information with your doctor. TBL does not recommend or endorse any specific physicians, clinics, tests, products, procedures, opinions or other information that may be mentioned or referenced on Materials through this program or www.thinbluelinebenefits.com/healthcare

TBL's only role is as program manager for the healthcare programs being for the benefit of enrolled individuals and their families. The individual and their families shall hold TBL harmless for any claims, choices in actions, and action related to any third-party vendors providing services or benefits as part of the program.

TBL does not provide tax, legal or accounting advice, and does not opine on the tax attributes or tax aspects of these benefits. You should consult your own tax, legal and accounting advisors regarding the treatment of any program related terms, conditions or features.

Payment Terms:

In exchange for Thin Blue Line Benefits Association Program the individual agrees to pay a monthly premium in the amount selected by options listed in this agreement and in accordance with members enrolled. This monthly fee is payable on the date the Agreement is executed with subsequent payments commencing 30 days after the 1st of the subsequent month. Payments will be due by the 1st of each month thereafter. Parties agree that the required method of monthly payment shall be by automatic payment, through a pre-authorized ACH. If this Agreement is cancelled by either party before the Agreement ends, We will review and settle your account as follows: (i) We will refund to You the unused portion of your premium on a per diem basis; or (ii) If monies are still owed you shall immediately reimburse TBL for that amount.



EXHIBIT A

ACH Authorization Form

Recurring ACH Payment Authorization

By submitting your account information, you authorize Thin Blue Line Benefits Association to electronically debit and credit your account on a recurring basis as set forth in your membership agreement or as displayed to you during the enrollment process. You understand you can contact Thin Blue Line Benefits Association to revoke this authorization at any time.

I authorize Thin Blue Line Benefits Association, to charge the account information (routing number and account number) provided in the online enrollment system, for my plan selection amount on the 1st day of each month.

This payment is for Monthly Member Healthcare Program.

(Description of Goods/Services)

Member Information

I understand that this authorization will remain in effect until I cancel it in writing, and I agree to notify Thin Blue Line Benefits Association in writing of any changes in my account information or termination of this authorization at least 15 days prior to the next billing date. If the above noted payment dates fall on a weekend or holiday, I understand that the payments may be executed on the next business day. For ACH debits to my checking/savings account, I understand that because these are electronic transactions, these funds may be withdrawn from my account as soon as the above noted periodic transaction dates. In the case of an ACH Transaction being rejected for Non-Sufficient Funds (NSF) I understand that Thin Blue Line Benefits Association may at its discretion attempt to process the charge again within 30 days, and agree to an additional \$ 25.00 charge for each attempt returned NSF which will be initiated as a separate transaction from the authorized recurring payment. I acknowledge that the origination of ACH transactions to my account must comply with the provisions of U.S. law. I certify that I am an authorized user of this bank account and will not dispute these scheduled transactions with my bank; so long as the transactions correspond to the terms indicated in this authorization form.

EXHIBIT A

Signature Certificate

Document Reference: 000E22056Vt2sGXCI4AFKIH2HOycBB4hl

[Redacted]	Electronic signature:
IP Address: [Redacted]	[Redacted]
VERIFIED EMAIL: [Redacted]	

Timestamp / Audit

13-Nov-2024 10:41:18 (UTC-08:00) Pacific Time (US & Canada)
Document signed by [Redacted]
13-Nov-2024 18:41:18 (UTC +00:00) Server Timezone
All parties signed the document. The document was saved in [Redacted] File Folder



THIN BLUE LINE
B E N E F I T S

EXHIBIT A

PO Box 341742
Lakeway, TX 78734

866-921-2583 
info@thinbluelinebenefits.com 



Urgent: NOTICE OF NON-RENEWAL – Take Action Now To Obtain New Coverage

August 15, 2025

Dear [REDACTED]

Why am I getting this letter?

Please be advised that Thin Blue Line Benefits Association is non-renewing your existing health plan effective on the last day of the current plan year. The last day of the current plan year is August 31, 2025.

WHAT YOU NEED TO DO:

Choose a health plan to replace your current health plan by:

Contacting your insurance agent or broker for assistance; or Going to your state Marketplace or Exchange website or Healthcare.gov.

Please be advised that Thin Blue Line Benefits Association and its third-party administrator, EOB TPA, LLC, will continue to process claims for services provided prior to the date your coverage terminates so long as claims are submitted on or before the last day of the run-out period. The last day of the run-out period is February 28, 2026.

If you have any questions, you may call Thin Blue Line at 866-921-2583 or email Thin Blue Line at info@thinbluelinebenefits.com. You may also call EOB TPA at 360-422-2629 or email EOB TPA at support@eobtpa.com, if you have any questions regarding a claim

Sincerely,

Anna Reed

CEO/President,
Thin Blue Line Benefits Association



EXHIBIT A

Medical - Primary Care Provider Options:**Value Plan**

Coverage Effective:

12/01/2024 - 08/31/2025

Total Monthly Premium:

\$1398.00

Coverage:

[REDACTED] (Self) [REDACTED] (spouse)

Bill For The Month:

\$1398.00

Convenience Fee:

\$4.50

Technology Fee:

\$1.50

Total Due:**\$1404.00****Account Holder**

[REDACTED]

[REDACTED]

gmail.com

Payment Transaction Date:

4/1/2025

Transaction Method Last4 Digits:

[REDACTED]

Payment Method:

ACH

This Receipt is confirmation that you have previously eSigned and authorized Thin Blue Line Benefits Association Holdings, LLC to debit the bank account indicated on this web form for the noted amount. This transaction will happen monthly to pay for the above insurance services on your behalf and will be withdrawn on the noted date. This Receipt will serve as your formal receipt. You understand that in the event this ACH transaction is returned by your financial institution, you may be subject to a returned item fee. You understand that this authorization will remain in full force and effect until you notify Thin Blue Line Benefits Association Holdings, LLC in writing that you wish to revoke this authorization. You understand that Thin Blue Line Benefits Association Holdings, LLC requires at least 15 days prior notice in order to cancel this authorization.

If you have any questions regarding your payment please contact us: Call Thin Blue Line Benefits Association Holdings, LLC Team: (866) 921-2583, Email: info@thinbluelinebenefits.com

Thin Blue Line Benefits Association Holdings, LLC: 701 Marriott Drive, Nashville, TN, 37214

Time Stamp: 01-Apr-2025 10:28:21 (UTC-08:00) Pacific Time (US & Canada)

STATE OF ARIZONA

DEPARTMENT OF INSURANCE AND FINANCIAL INSTITUTIONS

In the Matter of Unlicensed Activity of:

**THIN BLUE LINE BENEFITS
ASSOCIATIONS HOLDINGS LLC;**

**THIN BLUE LINE BENEFITS
ASSOCIATION LLC;**

THIN BLUE LINE BENEFITS, INC;

ANNA REED, PRESIDENT AND CEO,

And

GUINETH A. REED, MANAGER

Respondents.

No. 25A- 089 -INS

ORDER TO CEASE AND DESIST

The Arizona Department of Insurance and Financial Institutions (“Department”) received evidence that Thin Blue Line Benefits Association Holdings LLC, Thin Blue Line Benefits Association LLC, Thin Blue Line Benefits, Inc, Anna Reed, and Guienth A. Reed (“Thin Blue Line” or “Respondents”) have unlawfully engaged in the business of transacting insurance in the State of Arizona without obtaining a certificate of authority from the Director of the Department (“Director”). Accordingly, the Director makes the following Findings of Fact and Conclusions of Law and enters the following Order pursuant to A.R.S. § 20-401.02(A).

EXHIBIT B**FINDINGS OF FACT**

1
2 1. Thin Blue Line Benefits Associations Holdings LLC is a Texas entity
3 registered with the Texas Secretary of State on May 26, 2020. The entity's current
4 registration status with the Texas Secretary of State is active. Anna Reed is the Registered
5 Agent, the CEO, and the President of the entity.

6 2. Thin Blue Line Benefits Association LLC is a Texas entity registered with the
7 Texas Secretary of State on June 26, 2020. The entity's current registration status with the
8 Texas Secretary of State is inactive. Guineth A. Reed is the Registered Agent and the
9 Manager for the entity.

10 3. Thin Blue Line Benefits, Inc. is a Texas entity registered with the Texas
11 Secretary of State on August 12, 2025. The entity's current registration status with the
12 Texas Secretary of State is active. Guineth A. Reed is the Registered Agent for the entity.

13 4. Thin Blue Line's and its Registered Agent's mailing address is 208 Fulton
14 Avenue, Rockport, Texas 78382.

15 5. Thin Blue Line is not registered with the Arizona Corporation Commission.

16 6. Thin Blue Line does not, nor has it ever held a license or certificate issued by
17 the Department that would authorize it to enter into insurance contracts for healthcare
18 coverage in Arizona.

19 7. Beginning in January 2025, the Department received multiple complaints
20 against Thin Blue Line from Arizona consumers and health providers alleging, among other
21 allegations, that Thin Blue Line failed to pay claims for the medical services provided and is
22 unresponsive to the consumers' and health providers' inquiries.

EXHIBIT B

1 8. The Department commenced an investigation into this matter. The
2 Department's investigation found the following:

- 3 • Thin Blue Line marketed and sold insurance plans to retired law enforcement
4 and fire personnel that would "fill the gap" between their retirement from duty
5 and their eligibility for Medicare at the age of 65. Thin Blue Line presented to
6 Arizona consumers that they are being enrolled in a health insurance plan and
7 collected monthly insurance premiums payments.
- 8 • On or about March 4, 2025, the Department issued a subpoena requiring Thin
9 Blue Line to appear before the Department for an examination under oath on
10 March 31, 2025, and to produce records related to the complaints' allegations.
11 The subpoena further indicated that the complainants reported that they are
12 **insured by Thin Blue Line** *[emphasis added]*; however, the Department's
13 records indicate that Thin Blue Line does not hold a Department's issued
14 certificate of authority or an insurance producer license, nor it is registered with
15 the Arizona Corporation Commission authorizing it to conduct business in
16 Arizona.
- 17 • On or about March 18, 2025, Thin Blue Line requested an extension to produce
18 the requested records. The Department granted the extension.
- 19 • On or about April 14, 2025, Thin Blue Line provided a response stating, in part,
20 that Thin Blue Line "sponsors [a group health insurance] for the benefit of its
21 eligible members." Thin Blue Line further claimed that it is "an 'employee
22 organization' as contemplated by The Employment Retirement Income Security

EXHIBIT B

1 Act of 1974, as amended (“ERISA”). Accord 29 U.S.C. § 1002(4).” Thus,
2 exempt from the Arizona State insurance laws.

- 3 • On or about April 23, 2025, the Department contacted the Arizona Fraternal
4 Order of Police (“AZFOP”) to inquire about their association with Thin Blue
5 Line.
- 6 • On or about May 1, 2025, the AZFOP responded to the Department stating, in
7 part, “[t]he only communication we received was that [Thin Blue Line was]
8 providing Pre-65 retiree health care. ... The only relationship that was
9 developed beyond that with AZFOP was a ‘landing page’ that AZFOP placed a
10 link on our website for.”
- 11 • On or about June 30, 2025, Thin Blue Line provided a supplemental response to
12 the Department stating in part that the reason for the delay in payment of behalf
13 Arizona claimants relates to challenges that Thin Blue Line has experienced
14 with migrating claims and cost-sharing accumulator data from its prior claim
15 administrator – Quilt Benefits LLC – after their contract terminated around
16 December 1, 2024. A response further indicated that from January to June
17 2025, Thin Blue Line had 4682 Arizona members with a total collected
18 premium in the amount of \$5,884,947.48.
- 19 • Thin Blue Line, however, failed to provide any evidence to support their claim
20 that it is an “employee organization.”
21
22

EXHIBIT B**CONCLUSIONS OF LAW**

1. The Director has jurisdiction over this matter.

2. Respondents' conduct, as described above, constitutes the entering into contracts by which Respondents undertake to indemnify consumers or to pay a specific amount on determinable contingencies. A.R.S. § 20-103.

3. Respondents' conduct, as described above, constitutes the solicitation and inducement; preliminary negotiations; the effectuation of a contract of insurance, and transactions of matters subsequent to effectuation of the contract and arising out of it as related to the transaction of insurance business. A.R.S. § 20-106(A).

4. Respondents' conduct, as described above, constitutes a transaction of insurance business in Arizona by an unauthorized insurer by making of or proposing to make, as an insurer, an insurance contract, taking or receiving of any application for insurance, issuing or delivering contracts of insurance to Arizona consumers, transacting of any kind of insurance business specifically recognized as transacting an insurance business within the meaning of the statutes relating to insurance. A.R.S. § 20-106(B).

5. Respondents' conduct, as described above, constitutes transacting a business of insurance in Arizona without complying with the applicable provisions of Title 20. A.R.S. § 20-107(A).

6. Respondents' conduct, as described above, constitutes acting as an insurer in Arizona without a subsisting authority granted to it by the Director. A.R.S. § 20-206(A).

EXHIBIT B

1 7. Respondents' conduct, as described above, constitutes violations of Title 20
2 provisions and Respondents do not qualify to hold authority to transact insurance in
3 Arizona. A.R.S. § 20-207.

4 8. Respondents' conduct, as described above, constitutes the collection of
5 premium tax without complying with all applicable reporting provisions. A.R.S. § 20-224.

6 9. Respondents' conduct, as described above, constitutes transacting insurance
7 business, as provided by Section 20-106, without a certificate of authority from the Director.
8 A.R.S. § 20-401.01(A).

9 10. Respondents' conduct, as described above, constitutes the unauthorized
10 transaction of insurance in Arizona, a class 5 felony. A.R.S. § 20-401.06.

11 11. Respondents' transaction of insurance business in violation of Section 20-
12 401.01 does not impair the validity of any act or contract, nor does it impair Respondents'
13 obligation to pay any claim or loss within the provisions of the insurance contract. A.R.S. §
14 20-402.

15 12. Respondents are not exempt from the certificate of authority requirement.
16 A.R.S. § 20-404.

17 13. Grounds exist for the Director to order Respondents to cease and desist from
18 transacting insurance in the State of Arizona. A.R.S. § 20-401.02(A).

ORDER

IT IS HEREBY ORDERED THAT:

21 1. Respondents shall immediately cease and desist from transacting business of
22 insurance in the State of Arizona.

EXHIBIT B

1 2. Respondents shall continue to process and pay any and all outstanding
2 obligations under existing contracts until they are canceled in compliance with applicable
3 provisions of Title 20.

4 3. Respondents shall immediately, but not later than thirty (30) days upon
5 service of this Order, provide to the Department a list of all Arizona consumers to whom
6 Respondents have issued contracts to. Respondents shall provide the Department with the
7 name, mailing address, telephone number, and email address of each Arizona consumer
8 who entered into a contract with Respondents. Additionally, no later than thirty (30) days
9 upon service of this Order, Respondents shall provide a list of all insurance producers
10 contracted with or soliciting Respondents' purported insurance contracts in Arizona,
11 including the name, mailing address, telephone number, and email address of each licensed
12 insurance producer. Further, Respondents shall immediately, but not later than thirty (30)
13 days upon service of this Order, provide to the Department a list of all third-party
14 administrators contracted with Respondents, including the name, mail address, telephone
15 number and email address for each third-party administrator.

16 4. Respondents shall not later than thirty (30) days upon service of this Order,
17 provide to the Department Notices of Cancellation for approval to be sent to all current
18 policyholders, including return of any unearned premiums. Upon approval by the
19 Department, Respondent shall mail all Notices of Cancellation to all current policyholders
20 and provide to the Department proof of certified mail delivery.

21 5. This Order shall become effective immediately and shall remain in full force
22 and effect until otherwise stayed, modified, vacated or set aside.

EXHIBIT B**NOTICE OF OPPORTUNITY FOR HEARING**

Pursuant to Title 20 of the Arizona Revised Statutes, Respondents are hereby notified that they may request a hearing pursuant to A.R.S. § 20-161 to contest the order to cease and desist. Such a request must be in writing and received at the following address within thirty (30) days from the date hereof:

Arizona Department of Insurance and Financial Institutions
Attn: Alena Caravetta, Regulatory Legal Affairs Officer
100 North 15th Avenue, Suite 261
Phoenix, Arizona 85007-2630

Upon receipt of a timely written request for a hearing, the Department will issue an order setting the time and place of the hearing.

Effective this 16th day of July, 2025.

Maria Ailor

Maria Ailor, Interim Director
Arizona Department of Insurance and Financial Institutions

EXHIBIT B

COPY of the foregoing mailed by U.S. First Class and Certified Mail,
Delivery Receipt requested,

this 16th day of July, 2025, to:

Steven L. Imber, Esq.

Polsinelli PC

900 W. 48th Place, Suite 900

Kansas City, MO 64112

Attorney(s) for Respondents

9489 0090 0027 6708 8318 98

Thin Blue Line Benefits Associations Holdings LLC;

Thin Blue Line Benefits Association LLC;

Thin Blue Line Benefits, Inc;

Ann Reed, President and CEO,

Guineth A. Reed, Manager

208 Fulton Avenue

Rockport, TX 78382

Respondents

9489 0090 0027 6708 8319 04

COPY of the foregoing electronical delivered to:

Deian Ousounov, Chief Deputy Director of Finance

Alena Caravetta, Regulatory Legal Affairs Officer

Ana Starcevic, Project Specialist

Catherine O'Neil, Consumer Legal Affairs Officer

Steven Fromholtz, Licensing Manager

Linda Lutz, Legal Assistant

Rachel Smith, Investigator

Arizona Department of Insurance and Financial Institutions

100 North 15th Avenue, Suite 261

Phoenix, Arizona 85007-2630

Steven L. Imber, Esq.

simber@polsinelli.com

Attorney(s) for Respondents

Ana Starcevic

EXHIBIT BIN THE COURT OF COMMON PLEAS
FRANKLIN COUNTYJUDITH L. FRENCH,
SUPERINTENDENT, OHIO
DEPARTMENT OF INSURANCE

Plaintiff,

v.

THIN BLUE LINE BENEFITS
ASSOCIATION, LLC, et al.

Defendants.

CASE NO. 25CV-5302

JUDGE MUNSON

CATEGORY H: Other Civil

TEMPORARY RESTRAINING ORDER
AND
NOTICE OF HEARING ON PRELIMINARY INJUNCTION

This matter came before the Court on June 25, 2025 on Plaintiff's Motion for Temporary Restraining Order under R.C. 3905.22(H) and Civ. R. 65. Plaintiff seeks to prohibit Defendants Thin Blue Line Benefits Association LLC and Thin Blue Line Benefits Association Holdings LLC (Thin Blue Line) from engaging in unfair or deceptive acts or practices in the business of insurance as defined by R.C. 3901.21 and prohibited by R.C. 3901.20.

Plaintiff was represented by counsel from the Ohio Attorney General's Office. Defendants Thin Blue Line Benefits Association LLC and Thin Blue Line Benefits Association Holdings LLC did not appear at the hearing.¹ Counsel for Plaintiff certified to the court the efforts made to give

¹ The Court notes that an Emergency Motion to Continue was denied by separate Entry.

notice to Defendants and the reasons supporting Plaintiff's claim that notice should not be required. However, notice was provided to counsel for Defendants as of June 24, 2025 at 12:46 p.m.

The Court, having considered the complaint, the motion, and accompanying affidavits and exhibits, finds as follows:

1. Under R.C. 3901.22(H), the Superintendent of the Ohio Department of Insurance (the Superintendent) is entitled to a temporary restraining order, restraining or preventing any unfair or deceptive acts or practices in the business of insurance;
2. Under Civ. R. 65, a temporary restraining order may be granted without written or oral notice to the Defendant if it clearly appears from specific facts shown by affidavit or by the verified complaint that immediate and irreparable injury, loss or damage will result to the applicant before the adverse party or his attorney can be heard in opposition;
3. Under R.C. 3901.20 and 3901.21, Defendants are engaged in unfair and deceptive acts and practices in the business of insurance by:
 - a. Holding themselves out as and acting as an insurer in the State of Ohio without a license to do so as required by R.C. Titles 17 and/or 39;
 - b. Offering and selling insurance policies with the promise to provide health insurance coverage, but failing to do so;
 - c. Offering insurance plans with the promise of access to Cigna's in-network providers, but failing to provide such access;
 - d. Accepting monthly premium payments from policyholders, but failing to pay medical claims those policyholders incurred;

- e. Misrepresenting the terms of its health insurance policies and the benefits and advantages of them;
 - f. Failing to respond to and address consumer complaints regarding Defendants' failure to pay claims.
- 4. It is substantially likely that Plaintiff will prevail on the merits;
 - 5. Denying the injunction will cause Plaintiff and Ohio consumers to suffer irreparable injury, including:
 - a. Policyholders continue to need access to medical care, including follow-up appointments to care already provided, but are unable to use the health insurance Defendants promised them;
 - b. Providers are demanding payment from the policyholders for claims not paid by Thin Blue Line;
 - c. Policyholders continue to pay monthly premiums despite not being given the health insurance coverage promised by Thin Blue Line through its health insurance plans.
 - 6. Granting the injunction will not cause third parties to suffer unjustifiable harm;
 - 7. The injunction will serve the public interest.

IT IS THEREFORE ORDERED AND DECREED that Defendants Thin Blue Line Benefits Association LLC and Thin Blue Line Benefits Association Holdings LLC shall be restrained and enjoined as follows:

- 1. Prohibiting Thin Blue Line from operating in Ohio without a certificate of authority or license as required by R.C. 3927.01, other than to fulfill its obligations to its current

and past policyholders who have unpaid claims and to carry out its other responsibilities under currently-existing and any past policies;

2. Prohibiting Thin Blue Line from holding itself out as a health insurer in Ohio;
3. Prohibiting Thin Blue Line from advertising health insurance plans in Ohio including advertising on the internet;
4. Prohibiting Thin Blue Line from enrolling new members in Ohio;
5. Prohibiting Thin Blue Line from collecting any premium payments from policyholders in Ohio; and
6. Prohibiting Thin Blue Line from violating any other provision of R.C. Title 39 in Ohio.

This Order shall expire fourteen days from the date of entry, unless, for good cause shown, it is extended pursuant to Civ. R. 65 or by consent of the parties. **A hearing on Plaintiff's Motion for Preliminary Injunction is set for July 9, 2025 at 1:30 p.m. in Courtroom 7C.**

The Clerk is instructed to serve this Order upon Defendant by certified mail in accordance with Civ. R. 4.3. No bond shall be required to effectuate this Order.

Electronically signed by:
JUDGE HELD PHIPPS for JUDGE MUNSON

EXHIBIT B

Franklin County Court of Common Pleas

Date: 06-25-2025
Case Title: JUDITH L FRENCH -VS- THIN BLUE LINE BENEFITS
ASSOCIATION LLC ET AL
Case Number: 25CV005302
Type: T R O (TEMPORARY RESTRAINING ORDER) ON

It Is So Ordered.

A handwritten signature in black ink, appearing to read "K. Held Phipps", is written over a circular official seal. The seal contains the text "COMMON PLEAS COURT" and "FRANKLIN COUNTY OHIO" around the perimeter, with "ALL THINGS ARE POSSIBLE" at the bottom.

/s/ Judge Karen Held Phipps

EXHIBIT B

**IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY, OHIO**

JUDITH L. FRENCH, SUPERINTENDENT,	)	
OHIO DEPARTMENT OF INSURANCE	)	
METROPOLITAN HOLDINGS, LTD. ET	)	Case No. 25CV-5302
AL.,	)	
	)	Judge Sheryl Munson
Plaintiff,	)	
	)	
vs.	)	
	)	
THIN BLUE LINE BENEFITS	)	
ASSOCIATION, LLC ET AL.,	)	
	)	
Defendants.	)	

ORDER SETTING HEARING ON TEMPORARY RESTRAINING ORDER

This matter is before the Court on Plaintiff’s June 24, 2025 Motion for a Temporary Restraining Order. A hearing on the pending Motion is set for June 25, 2025 at 1:00 p.m., Courtroom 7F.

IT IS SO ORDERED.

JUDGE HELD PHIPPS for JUDGE MUNSON

EXHIBIT B

Franklin County Court of Common Pleas

Date: 06-24-2025
Case Title: JUDITH L FRENCH -VS- THIN BLUE LINE BENEFITS
ASSOCIATION LLC ET AL
Case Number: 25CV005302
Type: NOTICE OF HEARING - ORDER

It Is So Ordered.

A handwritten signature in black ink, appearing to read "K. Held Phipps", is written over a circular official seal. The seal contains the text "COMMON PLEAS COURT" and "ALL THINGS ARE POSSIBLE".

/s/ Judge Karen Held Phipps

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTYJUDITH L. FRENCH,
SUPERINTENDENT, OHIO
DEPARTMENT OF INSURANCE

Plaintiff,

v.

THIN BLUE LINE BENEFITS
ASSOCIATION, LLC, et al.

Defendants.

CASE NO. 25CV-5302

JUDGE MUNSON

CATEGORY H: Other Civil

ORDER APPOINTING CONSERVATOR
AND TEMPORARY RESTRAINING ORDER TO PRESERVE ASSETS

This matter came before the Court on June 25, 2025 on Plaintiff's Motion for Appointment of Conservator and Temporary Restraining Order to Prevent Dissipation of Assets. Plaintiff seeks to be appointed as the conservator over Defendants Thin Blue Line Benefits Association LLC and Thin Blue Line Benefits Association Holdings LLC (collectively, Thin Blue Line) and, if so appointed, seeks a temporary restraining order and preliminary injunction to preserve Thin Blue Line's assets.

Plaintiff was represented by counsel from the Ohio Attorney General's Office. Defendants Thin Blue Line Benefits Association LLC and Thin Blue Line Benefits Association Holdings LLC did not appear at the hearing. Counsel for Plaintiff certified to the court the efforts made to give notice to Defendants and the reasons supporting Plaintiff's claim that notice should not be required. R.C. 3903.50(B) provides that when an order is sought under R.C. 3903.50(A), the court shall cause the insurer to be given such notice and time to respond as is reasonable under the

circumstances. The Court finds an emergency exists and reasonable attempts at notice and an opportunity to respond were given.

The Court, having considered the complaint, the motion, and accompanying affidavits and exhibits, finds as follows:

1. Under R.C. 3903.50(A) if a domiciliary liquidator has not been appointed, the superintendent of insurance may file a complaint in the court of common pleas for an order directing her to act as conservator to conserve the property of an alien insurer not domiciled in this state or a foreign insurer on the grounds that its certificate of authority to do business in this state has been revoked or none was ever issued and that there are residents of this state with outstanding claims or outstanding policies;
2. Thin Blue Line is an “insurer” as defined by R.C. 3903.01(P); is a “foreign insurer” organized under the laws of Texas and doing business in Ohio; is “doing business” in Ohio as defined by R.C. 3903.01(H); and is subject to conservatorship proceedings under R.C. 3903.03 and 3903.50;
3. Thin Blue Line was never issued a certificate of authority or license to operate in the State of Ohio;
4. Residents of this state have both outstanding claims and outstanding policies;
5. There is reasonable cause to believe that the continued operation of Thin Blue Line is financially hazardous to policyholders, creditors, or the general public;
6. It is substantially likely that Plaintiff will prevail on the merits;
7. Denying the conservatorship will cause Plaintiff and Ohio consumers to suffer irreparable injury, including the possibility of the transfer of property, waste of Thin Blue Line’s assets, dissipation and transfer of bank accounts, or other loss of assets;

8. Granting the conservatorship will not cause third parties to suffer unjustifiable harm;
9. A conservatorship will serve the public interest by preserving the status quo so that Thin Blue Line's financial position can be ascertained and maintained during the pendency of this action so that consumers are not further harmed and assets are not wasted.

It is hereby ORDERED, ADJUDGED, and DECLARED as follows:

1. Sufficient cause exists for the entry of an order for conservatorship of Thin Blue Line.
2. Thin Blue Line was never issued a certificate of authority or license to do business in this state and there are residents of this state with outstanding claims or outstanding policies.
3. Judith L. French, Superintendent of Insurance for the State of Ohio, and her successors in office, is hereby appointed Conservator of Defendant pursuant to the provisions of R.C. Chapter 3903.
4. The Conservator may appoint a Chief Deputy Conservator and other such Deputy Conservators as she deems necessary pursuant to the provisions of R.C. Chapter 3903.
5. The Conservator, the Chief Deputy Conservator, all Deputy Conservators, and all employees who serve under the Conservator in the Ohio Department of Insurance are provided the indemnification and immunity specified in R.C. 3903.07 and elsewhere in the Revised Code.
6. Thin Blue Line, and any officer, manager, director, trustee, owner, employee, agent, or any other persons with authority over or in charge of any segment of Thin Blue Line are ordered to and shall cooperate with the Superintendent, Conservator, or any Deputy

Conservator in the performance of their duties. The definition of cooperate shall include, but not be limited to, a duty to do the following:

- i. Reply promptly in writing to any inquiry from the Superintendent, Conservator, or any Deputy Conservator requesting such a reply.
- ii. Preserve and immediately make available to the Superintendent, Conservator, or any Deputy Conservator all books, accounts, documents, or other records or information and property, including but not limited to documents, records, information, computers, electronic data, tapes, discs, writings, any other recording of information, belonging to Thin Blue Line, in whatever name the same may be held.
- iii. Preserve and immediately make available to the Superintendent, Conservator, or any Deputy Conservator any books, accounts, documents, or other records or information or property relating or pertaining to Thin Blue Line, including but not limited to documents, records, information, computers, electronic data, tapes, discs, writings, any other recording of information, regardless of ownership, form or location, that are in the person's or entity's possession, custody, or control.
- iv. Disclose verbally or in writing the exact whereabouts of such items and information referenced in paragraph (2) and (3) above, if not in possession, custody or control of the person or entity.

2. All other terms the court considers appropriate pursuant to R.C. 3903.50(C).

Pursuant to R.C. 3903.50(C), persons dealing with the property of the insurer are charged with notice of a judgment ordering the supervisor to act as conservator under this section from the time when the judgment is filed under Civil Rule 58, or a certified copy of the judgment is filed

under Civil Rule 3(F), with the clerk of the court of common pleas of the county in which the principal business of the company is located or the county in which its principal office or place of business is located.

TEMPORARY RESTRAINING ORDER TO PREVENT DISSIPATION OF ASSETS

Under R.C. 3903.05, a conservator in a proceeding under R.C. 3903.50 may move a court of general jurisdiction to issue a temporary restraining order, preliminary injunction, permanent injunction, or such other orders that the court considers necessary and proper to prevent certain actions of the insurer enumerated under (A)(1) through (A)(11). The Superintendent moved this Court, in the event that she was appointed Conservator, for a temporary restraining order preventing certain actions by Thin Blue Line that could result in dissipation of assets of Thin Blue Line during the pendency of this suit.

Pursuant to R.C. 3903.05(A) and for the reasons listed in this Order and upon good cause shown, it is hereby ORDERED, ADJUDGED, and DECLARED that Thin Blue Line is prohibited from:

1. The transaction of further business, other to carry out its responsibilities under currently-existing policies;
2. The transfer of property;
3. Interference with the receiver, conservator, rehabilitator, or liquidator or with a proceeding under sections 3903.01 to 3903.59 of the Revised Code;
4. Waste of the insurer's assets;
5. Dissipation and transfer of bank accounts;
6. The commencement or further prosecution of any actions or proceedings;

EXHIBIT B

7. The obtaining of preferences, judgments, attachments, garnishments, or liens against the insurer, its assets, or its policyholders;
8. The levying of execution against the insurer, its assets, or its policyholders;
9. The making of any sale or deed for nonpayment of taxes or assessments that would lessen the value of the assets of the insurer;
10. The withholding from the receiver, conservator, rehabilitator, or liquidator of books, accounts, documents, or other records relating to the business of the insurer;
11. Any other threatened or contemplated action that might lessen the value of the insurer's assets or prejudice the rights of policyholders, creditors, or shareholders, or the administration of any proceeding under sections 3903.01 to 3903.59 of the Revised Code.

The Clerk is instructed to serve this Order upon Defendant by certified mail in accordance with Civ. R. 4.3. No bond shall be required to effectuate this Order.

Electronically signed by:
JUDGE HELD PHIPPS for JUDGE MUNSON

EXHIBIT B

Franklin County Court of Common Pleas

Date: 06-25-2025
Case Title: JUDITH L FRENCH -VS- THIN BLUE LINE BENEFITS
ASSOCIATION LLC ET AL
Case Number: 25CV005302
Type: T R O (TEMPORARY RESTRAINING ORDER) ON

It Is So Ordered.

A handwritten signature in black ink, appearing to read "K. Held Phipps", is written over a circular official seal. The seal contains the text "COMMON PLEAS COURT" and "FRANKLIN COUNTY OHIO" around the perimeter, with "ALL THINGS ARE POSSIBLE" at the bottom.

/s/ Judge Karen Held Phipps

EXHIBIT B

STATE OF WASHINGTON OFFICE OF THE INSURANCE COMMISSIONER

In the Matter of

**THIN BLUE LINE BENEFITS
ASSOCIATION LLC;**

**THIN BLUE LINE BENEFITS
ASSOCIATION HOLDINGS LLC;**

THIN BLUE LINE BENEFITS, INC.;

ANNA REED;

and

GUINETH A. REED.

Respondents.

Order No. 25-0181

ORDER TO CEASE AND DESIST

Pursuant to RCW 48.02.080 and RCW 48.15.023(5)(a) the Insurance Commissioner of the state of Washington (“OIC” or “Insurance Commissioner”) orders the above-named Respondents, and its officers, directors, trustees, employees, agents, and affiliates to immediately cease and desist from:

- A. Engaging in or transacting the unauthorized business of insurance in the state of Washington.
- B. Seeking, pursuing, and obtaining any insurance business in the state of Washington.
- C. Soliciting Washington residents to induce them to purchase any insurance contract.

Respondents shall continue to process and pay any and all outstanding obligations under contracts existing through August 31, 2025.

BASIS:

- 1. Thin Blue Line Benefits Association Holdings, LLC, Thin Blue Line Benefits

ORDER TO CEASE AND DESIST
ORDER NO. 25-0181

1

State of Washington
Office of the Insurance Commissioner
PO Box 40255
Olympia, WA 98504-0255

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EXHIBIT B

Association LLC, Thin Blue Line Benefits, Inc. (Collectively “TBL”), are Texas-based business entities that began operation on or about June 26, 2020. TBL is operated by Anna Reed and Guineth A. Reed. TBL is not authorized to provide insurance in Washington State.

2. The Office of the Insurance Commissioner (“OIC”) opened an investigation on July 3, 2025, following receipt of a complaint by a Washington consumer alleging that TBL failed to process health claims. To date, the OIC has received approximately forty-one (41) total complaints from retired state and local law enforcement officers (“the Complainants”) regarding TBL with similar allegations related to TBL’s failure to process and pay health claims. Complainants include Washington State residents, including retired police officers formerly with the Seattle Police Department.

3. TBL offered health insurance products to Washington State residents who were members of the National Fraternal Order of Police (“FOP”). These health insurance products mirror aspects of commercial health insurance products in tiered services, benefits offered, health provider network, and their structure of claims payment. TBL’s products constitute insurance under RCW 48.01.040. TBL entered into insurance contracts with Washington consumers wherein TBL is obligated to pay for health benefits listed in their plan document and at rates in accordance with provided Summaries of Benefits Coverage. Consumers signed Membership Agreements that obligated the consumers to pay monthly premiums, co-pays, co-insurance, and other financial requirements for the coverage of their claims.

4. In response to OIC’s Notice of Investigation, TBL admitted that its purpose is the provision of health insurance.

5. TBL’s contract with the FOP obligated TBL to market and sell its insurance products across the country.

6. TBL has consistently misrepresented itself to the public and to the OIC as a self-funded ERISA plan. TBL claims that it is therefore not an insurer selling insurance. However, TBL lacks all of the common indicia of an ERISA Plan. TBL has no trust, no Trustee, no named fiduciaries, and neither the employers nor employees to be qualified as an ERISA Plan. Furthermore, TBL has misrepresented itself as an employees’ benefits association, which would qualify its plans as bona fide ERISA Plans. TBL is not an employees’ benefits association. An employees’ benefits association requires that the associated employees share commonality of economic interest, including geographic commonality. As membership is open to consumers

EXHIBIT B

nationwide, TBL members do not share geographic commonality that would allow for common economic interest. In addition, TBL members are not TBL employees and TBL is not being controlled directly by, or through elected officers of, ERISA employees. As a result, TBL is neither an ERISA Plan nor an employees' benefits association. Rather, TBL has transacted insurance in Washington and acted as an unauthorized insurer.

7. TBL, as an unauthorized insurer, collected tens of thousands of dollars in premiums per month from Washington consumers and failed to timely pay claims or pay claims at all for primary care, diagnostic imaging, hospital visits, and urgent surgeries. In some instances, TBL has denied knowledge of any outstanding claims for some of the Complainants, but admits to the claims processing failures for other members.

8. 29 U.S.C. § 1002(1) states that the terms "employee welfare benefit plan" and "welfare plan" mean any plan, fund, or program which was heretofore or is hereafter established or maintained by an employer or by an employee organization, or by both, to the extent that such plan, fund, or program was established or is maintained for the purpose of providing for its participants or their beneficiaries, through the purchase of insurance or otherwise, (A) medical, surgical, or hospital care or benefits, or benefits in the event of sickness, accident, disability, death or unemployment, or vacation benefits, apprenticeship or other training programs, or day care centers, scholarship funds, or prepaid legal services, or (B) any benefit described in section 186(c) of this title (other than pensions on retirement or death, and insurance to provide such pensions).

9. 29 U.S.C. § 1002(3) states that the term "employee benefit plan" or "plan" means an employee welfare benefit plan or an employee pension benefit plan or a plan which is both an employee welfare benefit plan and an employee pension benefit plan.

10. 29 U.S.C. § 1002(4) states that the term "employee organization" means any labor union or any organization of any kind, or any agency or employee representation committee, association, group, or plan, in which employees participate and which exists for the purpose, in whole or in part, of dealing with employers concerning an employee benefit plan, or other matters incidental to employment relationships; or any employees' beneficiary association organized for the purpose in whole or in part, of establishing such a plan.

11. RCW 48.01.030 states the business of insurance is one affected by the public interest, requiring that all persons be actuated by good faith, abstain from deception, and practice

EXHIBIT B

honesty and equity in all insurance matters. Upon the insurer, the insured, their providers, and their representatives rests the duty of preserving inviolate the integrity of insurance.

12. RCW 48.01.040 states that “insurance” is a contract whereby one undertakes to indemnify another or pay a specified amount upon determinable contingencies.

13. RCW 48.01.050 states in relevant part that “insurer” as used in this code includes every person engaged in the business of making contracts of insurance.

14. RCW 48.01.060 states that “insurance transaction” includes any of the following: solicitation, negotiations preliminary to execution, execution of an insurance contract, transaction of matters subsequent to execution of the contract and arising out of it, and insuring.

15. RCW 48.02.080(3)(a) provides if the Insurance Commissioner has cause to believe that any person is violating or is about to violate any provision of this code or any regulation or order of the Insurance Commissioner, he or she may issue a cease and desist order.

16. RCW 48.05.030(1) provides no person shall act as an insurer and no insurer shall transact insurance in this state other than as authorized by a certificate of authority issued to it by the Insurance Commissioner and then in force; except, as to such transactions as are expressly otherwise provided for in this code.

17. RCW 48.15.020(1) provides an insurer that is not authorized by the Insurance Commissioner may not solicit insurance business in this state or transact insurance business in this state, except as provided in this chapter.

18. RCW 48.15.020(2)(a) provides that a person may not, in this state, represent an unauthorized insurer except as provided in this chapter.

19. RCW 48.15.020(2)(b) provides that a person, than a duly licensed surplus line broker acting in good faith under his or her license, who makes a contract of insurance in this state, directly or indirectly, on behalf of an unauthorized insurer, without complying with the provisions of this chapter, is personally liable for the performance of such contract.

20. RCW 48.15.023(2) states for the purpose of this section, an act is committed in this state if it is committed, in whole or in part, in the state of Washington, or affects persons or property within the state and relates to or involves an insurance contract.

21. RCW 48.15.023(5)(a) provides if the Insurance Commissioner has cause to believe that any person has violated the provisions of RCW 48.15.020(1), the Insurance Commissioner may issue and enforce a cease and desist order in accordance with the provisions of

EXHIBIT B

RCW 48.02.080; and/or assess a civil penalty of not more than twenty-five thousand dollars for each violation, after providing notice and an opportunity for a hearing in accordance with chapters 34.05 and 48.04 RCW.

22. Respondent's actions described herein violate Insurance Code, namely RCW 48.05.030(1) [Certificate of Authority required] and RCW 48.15.020(1) [Solicitation by insurer not authorized prohibited], justifying the issuance of a cease and desist order under RCW 48.15.023(5)(a) and RCW 48.02.080(3)(a).

THIS ORDER IS EFFECTIVE IMMEDIATELY AND IS ENTERED at Tumwater, Washington, this 19th day of November 2025.



PATTY KUDERER
Insurance Commissioner

By and through their designee

Signed by:



EE0E7B4707004ED...
WILL GENSCHOW

Insurance Attorney
Legal Affairs Division

EXHIBIT B**NOTICE OF YOUR RIGHT TO A HEARING**

If you are aggrieved by this Order to Cease and Desist and Imposing Fine, you may demand a hearing in accordance with RCW 48.04.010, WAC 284-02-070, and WAC 10-08-110. A demand for hearing must be **received** by the Office of the Insurance Commissioner (OIC) in writing, within **ninety (90) days** from the date the Order was mailed to you, or you will waive (give up) your right to a hearing.

If the Insurance Commissioner does not receive a hearing demand from Respondent within 90 days from the date Respondent received this Order, Respondent's right to a hearing is conclusively deemed to have been waived.

How do I request an administrative hearing?

By February 17, 2026 you must request a hearing by submitting the following documentation:

1. Complete and submit the OIC's Demand for Hearing form available online at www.insurance.wa.gov/how-file-demand-hearing.

OR

2. Provide a brief statement describing how you are harmed by this decision and why you disagree with it. Your statement must include contact information for you and any representative that appears on your behalf. Contact information must include name, phone number, mailing address and e-mail address.

Submit your demand for hearing and documentation to OIC Hearings Unit and a copy to Legal Affairs. Submit via **one** of the options below:

	Original to:	Copy to:
U.S. Mail	Hearings Unit Office of the Insurance Commissioner PO Box 40255 Olympia, WA 98504-0255	Legal Affairs Office of the Insurance Commissioner PO Box 40255 Olympia, WA 98504-0255
E-Mail	HearingsU@oic.wa.gov	Legal@oic.wa.gov
Personal Service or Overnight Mail	Hearings Unit Office of the Insurance Commissioner 5000 Capitol Boulevard Tumwater, WA 98501	Legal Affairs Office of the Insurance Commissioner 5000 Capitol Boulevard Tumwater, WA 98501
Fax	(360) 339-7061	(360) 586-0152

The OIC Hearings Unit will notify parties of hearing request and information regarding hearing date(s). If you have questions about filing a demand for hearing or the hearing process, please contact the Hearings Unit at (360) 725-7002 or email HearingsU@oic.wa.gov.

EXHIBIT BCERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On the date given below I caused to be served the foregoing ORDER TO CEASE AND DESIST NO. 25-0180 on the following individuals by depositing in the U.S. Mail via State Consolidated Mail Service with proper postage affixed to:

Thin Blue Line Benefits Association, LLC
P.O. Box 341742
Lakeway, TX 78734

Thin Blue Line Benefits, Inc.
208 Fulton Avenue
Rockport, TX 78382

Thin Blue Line Benefits Association Holdings, LLC
208 Fulton Avenue
Rockport, TX 78382

Anna Reed
208 Fulton Avenue
Rockport, TX 78382

Guineth A. Reed
208 Fulton Avenue
Rockport, TX 78382

Steven L. Imber, Esq.
Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, MO 64112

On the date given below I caused to be served the foregoing ORDER TO CEASE AND DESIST NO. 25-0180 via process server upon the following individuals:

Thin Blue Line Benefits Association Holdings, LLC
Attn: Anna Reed
208 Fulton Avenue
Rockport, TX 78382

Thin Blue Line Benefits Association, LLC
Attn: Guineth A. Reed
208 Fulton Avenue
Rockport, TX 78382

SIGNED this 19th day of November 2025, at Tumwater, Washington.

Signed by:

Christy Townsend

FAC359A9100842E...

Christy Townsend
Paralegal
Legal Affairs Division

ORDER TO CEASE AND DESIST
ORDER NO. 25-0181