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INSURANCE REGULATION
Docketed by: AMY

OFFICE OF INSURANCE REGULATION

MICHAEL YAWORSKY
COMMISSIONER

IN THE MATTER OF:

THIN BLUE LINE BENEFITS ASSOCIATION HOLDINGS, LLC;

THIN BLUE LINE BENEFITS ASSOCATION, LLC;

THIN BLUE LINE BENEFITS, INC.

_____/

Index: OIR 25-233
CASE NO.: 402050-25

EMERGENCY ORDER TO CEASE AND DESIST

TO:

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

THIN BLUE LINE BENEFITS ASSOCATION, 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

The STATE OF FLORIDA, OFFICE OF INSURANCE REGULATION ("OIR"), being authorized and directed to administer and enforce the Florida Insurance Code, hereby enters this Emergency Order to Cease and Desist, pursuant to the Florida Insurance Code and section

624.310(3)(f), Florida Statutes, against THIN BLUE LINE BENEFITS ASSOCATION HOLDINGS, LLC; THIN BLUE LINE BENEFITS ASSOCIATION, LLC; and THIN BLUE LINE BENEFITS, INC.

JURISDICTION

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

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

3. OIR has jurisdiction over the subject matter hereof and parties herein pursuant to sections 624.401, 626.8805, and 624.310 of the Florida Statutes.

FINDINGS OF FACT

4. 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.

5. 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.

6. 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.

7. 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 or Respondent.

8. THIN BLUE LINE operated a website under the web address thinbluelinebenefits.com. The primary purpose of this website was to advertise and market insurance options to retired first responders, who often retire before they are eligible to receive Medicare benefits.

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

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

11. OIR's investigation into THIN BLUE LINE's conduct is ongoing. However, OIR is currently aware of at least three THIN BLUE LINE contracts for insurance involving at least six Florida residents.

12. Between May 1, 2023, and August 31, 2025, THIN BLUE LINE transacted or administered a health, dental, and vision insurance contract for Florida residents K.H. and C.H. THIN BLUE LINE required K.H. and C.H. to pay a $1,363 monthly premium for this insurance contract.

13. Between January 1, 2024 and August 31, 2025, THIN BLUE LINE transacted or administered a primary care, dental, and vision insurance contract for Florida residents R.K. and D.K. THIN BLUE LINE required R.K. and D.K. to pay a monthly premium between $1,800 and $2,200 for this insurance contract.

14. Between December 1, 2024 and August 31, 2025, THIN BLUE LINE transacted or administered an insurance contract for Florida residents D.T. and N.T. THIN BLUE LINE required D.T. and N.T. to pay a $1,398.00 monthly premium for this insurance contract.

15. THIN BLUE LINE operates in multiple states across the United States. 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 or authority. An Ohio court subsequently placed THIN BLUE LINE in a court ordered conservatorship under the Ohio Superintendent of Insurance. *See* Composite Exhibit A attached to this Order.

16. 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 4600 Arizona residents insured with a total collected premium of over $5.8 million. *See* Composite Exhibit A attached to this Order.

17. As of October 29, 2025, THIN BLUE LINE has not applied for licensure in Florida.

CONCLUSIONS OF LAW

Definitions

18. 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."

19. 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 OIR.

20. 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.

21. 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."

22. 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) defines an "unauthorized insurer" as one not so authorized under the previously referenced subsection.

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

OIR Has Discretion to Issue an Emergency Order to Cease and Desist

24. OIR has jurisdiction to impose an emergency order to cease and desist pursuant to section 624.310(3)(f), Florida Statutes, when there is reasonable cause to believe that the person or individual named therein is engaging in or has engaged in conduct that is a violation of the Florida Insurance Code and that conduct is likely to cause insolvency, substantial dissipation or misvaluation of assets or earnings of the licensee, substantial inability to pay claims on a timely basis, or substantial prejudice to prospective or existing insureds, policyholders, subscribers, or

the public. Section 624.310(2)(a) specifies that this section applies to unlicensed persons subject to the regulatory jurisdiction of OIR.

25. THIN BLUE LINE'S activities do not fall within the exceptions, exclusions or exemptions provided in chapter 624 or any other provision of the Florida Statutes or federal law.

26. THIN BLUE LINE's actions are in violation of section 624.401(1), Florida Statutes, and are likely to cause substantial prejudice to current and former policy holders. As referenced above, two different jurisdictions have entered enforcement actions against THIN BLUE LINE involving allegations of unlicensed insurance transactions and failure to pay insurance claims. THIN BLUE LINE, as an unlicensed entity transacted or administered insurance contracts for Florida residents. Florida consumers and members of the public are prejudiced by THIN BLUE LINE'S illegal sale of policies and are in jeopardy of claims being unpaid or paid in an untimely fashion. While OIR may ordinarily assist, and seek administrative enforcement action, in disputes between consumers and licensed entities, because THIN BLUE LINE is unlicensed, OIR does not have access to any of the documentation required of licensed entities pursuant to the relevant provisions of the Florida Insurance Code. OIR is unable to verify, for example, THIN BLUE LINE's potential reserves, number of policies, administrators, corporate structure, or conduct any market conduct examinations in the same manner as OIR would with a duly licensed insurer. Because THIN BLUE LINE has never availed themselves to a proper license under Florida law, there is no mechanism other than this emergency order to cease and desist to ensure immediate compliance with Florida law and provide proper remedy to consumers.

EMERGENCY ORDER TO CEASE AND DESIST

OIR hereby orders THIN BLUE LINE, pursuant to section 624.310(3)(f), Florida Statutes, to immediately cease and desist from engaging as an unlicensed or unauthorized insurer. In order to cease and desist, and provide corrective and remedial action to consumers, THIN BLUE LINE is ordered to:

A. Cease from engaging in, marketing, advertising, or entering into contracts to provide insurance to any Florida consumers.

B. Cease and desist from transacting insurance policies. To cease and desist from transacting such policies, THIN BLUE LINE shall cancel any policies in place with a refund to consumers, or sell any active policies, with notice to consumers and OIR, to a person properly licensed or authorized to administer or transact such business under Florida law. Furthermore, THIN BLUE LINE shall continue responding to, and fulfilling, claims arising out of contracts involving Florida consumers.

C. Within thirty (30) days of receipt of this Order, provide OIR, as well as the Department of Financial Regulation, a copy of every insurance contract entered with a Florida resident or consumer.

D. Within thirty (30) days of receipt of this Order, provide notice to any affected Florida consumer, by copy of this Order, that THIN BLUE LINE is not a properly licensed Florida insurer.

E. Honor all current and future obligations and liabilities arising from its contracts in Florida and pay all obligations and liabilities that have arisen or may arise from its operations in Florida. If any court or administrative action, arbitration, mediation, or other judicial or quasi-

judicial action listing THIN BLUE LINE as a party is filed in Florida, THIN BLUE LINE shall provide written notice to the OIR within 30 days of the filing of said action.

F. Pursuant to section 624.310(3)(f), Florida Statutes, this Emergency Order to Cease and Desist shall be effective immediately upon service for at least ninety (90) days.

G. Pursuant to section 624.310(3)(f), Florida Statutes, OIR finds that confidentiality of this Emergency Order to Cease and Desist will result in substantial risk or financial loss to the public due to the risk of unpaid claims and unlicensed activity in violation of section 624.401(1), Florida Statutes. Therefore, this Emergency Order to Cease and Desist is not confidential or exempt from section 119.07, Florida Statutes.

DONE and ORDERED this 2nd day of December, 2025.

MICHAEL YAWORSKY
Commissioner
Office of Insurance Regulation

NOTICE OF RIGHTS

Any party to these proceedings adversely affected by this Order is entitled to seek immediate appellate review of this Order pursuant to sections 120.569(2)(n) and/or 120.60(6), Florida Statutes, Rule 28-106.501, Florida Administrative Code, and Rule 9.190, Florida Rules of Appellate Procedure. Review proceedings must be instituted by filing a Petition or Notice of Appeal with the General Counsel, acting as the agency clerk, at 200 East Gaines Street, Tallahassee, Florida 32399-4206, and a copy of the same and filing fee with the appropriate District Court of Appeal within thirty (30) days of the rendition of this Order.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Emergency Order to Cease and Desist 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 3rd day of December, 2025. 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

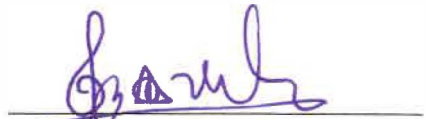
Anna Reed, Registered Agent
Thin Blue Line Benefits Association Holdings LLC.
208 Fulton Ave,
Rockport, Texas, 78382
anna@thinbluelinebenefits.com

THIN BLUE LINE BENEFITS ASSOCATION, 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



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@floir.com

COMPOSITE EXHIBIT A

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY

JUDITH 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;

COMPOSITE EXHIBIT A

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

COMPOSITE EXHIBIT A

Franklin County Court of Common Pleas

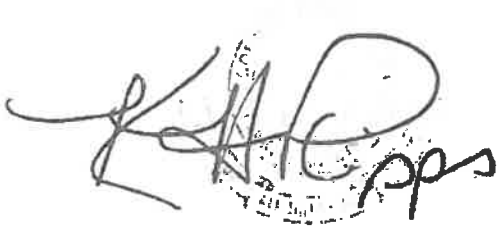
Date: 06-25-2025

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.



/s/ Judge Karen Held Phipps

COMPOSITE EXHIBIT A

IN THE COURT OF COMMON PLEAS
FRANKLIN COUNTY

JUDITH 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;

COMPOSITE EXHIBIT A

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

COMPOSITE EXHIBIT A

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

COMPOSITE EXHIBIT A

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;

COMPOSITE EXHIBIT A

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

COMPOSITE EXHIBIT A

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.

/s/ Judge Karen Held Phipps

COMPOSITE EXHIBIT A

Court Disposition

Case Number: 25CV005302

Case Style: JUDITH L FRENCH -VS- THIN BLUE LINE BENEFITS ASSOCIATION LLC ET AL

Motion Tie Off Information:

1. Motion CMS Document Id: 25CV0053022025-06-2499850000
   Document Title: 06-24-2025-MOTION FOR TEMPORARY RESTRAINING ORDER - PLAINTIFF: JUDITH L. FRENCH
   Disposition: MOTION GRANTED

Docusign Envelope ID: 28E43B1C-B8D6-4161-B6BB-AC87230BF2BE

STATE OF ARIZONA
Department of Insurance and Financial Institutions
FILED July 16, 2025 by AS

COMPOSITE EXHIBIT A

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).

Docusign Envelope ID: 28E43B1C-B8D6-4161-B6BB-AC87230BF2BE

COMPOSITE EXHIBIT A

FINDINGS OF FACT

1. Thin Blue Line Benefits Associations 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 is the Registered Agent, the CEO, and the President of the entity.

2. 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.

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

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

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

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

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

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

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

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

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

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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).

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

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

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

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

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

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

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

ORDER

IT IS HEREBY ORDERED THAT:

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

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

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

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

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

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COMPOSITE EXHIBIT A

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

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COMPOSITE EXHIBIT A

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
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Ana Starcevic