

DECLARATION OF MICHAEL STANLEY
PURSUANT TO 28 U.S.C. § 1746

I, Michael Stanley, hereby declare as follows:

1. My name is Michael Stanley. I live in Florida and am over eighteen years of age.

I have personal knowledge of the facts stated in this declaration, and if called as a witness, I could and would competently testify to these same facts.

2. On or about October 10, 2017, I asked a group of parents of my child's college classmates for resources for finding health insurance for my child. A fellow parent directed me to a website located at Official-Plans.com. I followed the link to the Official-Plans.com website, where I answered some basic questions about my child. The site listed a telephone number that I could call for "free health insurance rate quotes." It also instructed me to provide certain personal information in order to receive a call regarding health insurance. The site asked for a date of birth, height, weight, name, and address, in response to which I provided my daughter's information. I listed my own email address and contact phone number because I was handling the search and payment for her health insurance.

3. Within minutes of submitting my responses to the questions, I received a phone call. The caller identified himself as Mario from Simple Health and he said he would help me find an insurance plan appropriate and affordable for my child. I explained to Mario that my daughter is a healthy, 19-year old college student and that I needed to purchase health insurance for her. Based on communications from her college, I also told him that it was necessary that her insurance provide out of network benefits.

4. Mario proceeded to tell me he had found a PPO nationwide plan for my daughter that required no referrals, would allow her to choose her own doctor, had no exclusions of pre-existing conditions, and provided coverage throughout the United States. Mario indicated that

the insurance plan would cover doctor visits, diagnostic testing, medical and surgical procedures, hospitalization, and there would be no waiting period before coverage began. Mario told me that our out of pocket expenses would be 20% to 30% of the cost of primary care doctor visits, 20% to 40% of the cost of specialist visits, \$4 to \$12 for generic prescriptions, and \$5 to \$20 for name brand prescriptions. Mario also touted an app that would work in conjunction with the health insurance to help us locate the pharmacy with the lowest cost for any medication, based on zip code and the name and dosage of the medication.

5. Mario told me that this health insurance plan had no deductible and that it provided out of network benefits as well. He did say that the insurance coverage was limited because it would not include maternity care, services in a mental health facility, or substance abuse treatment. Given the otherwise comprehensive nature of the coverage, those few limitations were not a deal breaker for me. I asked Mario how much this insurance would cost. Mario told me that the monthly premium for this plan was \$172.71 and that there would be a \$125.00 enrollment fee charged, for a total first payment of \$297.71. Mario told me that for each month after the first, the monthly premium would be only \$172.71. He also said that there would never be a rate increase on this insurance. He further indicated that this was a month-to-month plan that I could cancel at any time with no cancellation fees. Mario told me that the plan also included a \$110,000 Accidental Death and Dismemberment plan at no additional cost.

6. When I asked, Mario searched his database and assured me that my child's doctor was within the plan's network. Given these assurances, I proceeded with the enrollment process, which included giving my child's name, date of birth, zip code, Social Security number (which Mario said was for age verification), and then my name, address, phone number, Social Security

number and email address. Because my child still had health insurance coverage through the end of 2017, I opted for the coverage to begin in January 2018.

7. Mario said he needed a credit card to secure this special rate to begin in January. I gave him my credit card information. He told me the payment would be processed on January 2, 2018 and coverage would begin at midnight on January 3, 2018.

8. Mario told me that the next step was to speak with another person who would be going over the policy information on a recorded line (for my protection) where I would need to answer a few questions. During the recorded conversation, the representative was giving me the same details that Mario had given me, and I confirmed each item he mentioned. Then he mentioned something about NCE Membership, which I made note of because I was going to ask a question about it. I was also given the number "MCELM02017," although I was not sure what that was for. After I finished with the recorded portion of the call, which took quite a while, I was transferred back to Mario. He said the application would be processed for approval and I would receive an email confirmation once processing was completed. Mario gave me his direct line to call him if I had any questions or concerns. The number he provided is 954-606-9070. I thanked him for his assistance and ended the call.

9. The next day I received a phone call from 954-398-1923. The caller was a woman, and she asked for my child. I said she was not available, but I was her father and might be able to help. She asked if I handle health insurance for my child, and I told her that I did. I explained that I had just signed her up for insurance to start in January 2018. The woman's tone completely changed after that. I inquired as to who she was and why was she asking about my child. In a rude and condescending tone, she said she was with the "insurance marketplace" and was calling to offer health insurance to my child, but I had already signed her up for insurance so

she could not help me. She was very short and curt. When I got home, I Googled the phone number she called from and found information from other consumers suggesting that the number was associated with a scam.

10. On or about the morning of October 13, 2017, I realized that I had not yet received a confirmation email from Simple Health about my child's health insurance coverage. I called Mario at 954-606-9070 to ask about the email. I reached a recording, which did not state a company name, but said I had reached customer service and provided a menu of options for continuing my call. I followed the prompts and was ultimately connected to Mario. His voice tone and demeanor had completely changed from the bubbly, friendly person I had spoken with a few days before. I told Mario that I was calling to check the status of the application, because I had not received the confirmation email he said I would. Mario said that I would not receive a confirmation email until the first payment was processed on January 2, 2018, because the account would not be established until that time. That sounded odd to me. I needed to be certain that my child would have health insurance, so I asked him if her coverage was guaranteed to begin in January. Mario said he did not understand. I again explained to him that I needed to know that the coverage was guaranteed, so my child would have health insurance coverage as of January. Mario said yes, the coverage would begin in January once they had received the first payment and then I would receive the confirmation email and welcome packet in the mail.

11. I asked also Mario for the name of the insurance company my child was enrolled with. His answer was "Unified Health," which he said is under the "Multiplan Network." He indicated that there was no policy number yet because the policy would not be created until they received the first payment in January. I thanked him and ended the call.

12. At this point, I became concerned that this was too good to be true. The transaction did not feel right to me. I Googled “Unified Health” and “Multiplan Network.” The search returned several results, including one called “Ripoff Report | NCE Unified Health One Unified Health Scam.” When I visited that site, I found a consumer’s description of Unified Health as “represented as insurance but is really a Discount Plan.” The narrative in the complaint described a situation like mine: a person shopping online for health insurance and ultimately purchasing this same plan, which was apparently not health insurance at all.

13. I next Googled 954-606-9070, which was Mario’s phone number. The results from this search also showed several complaints, each describing the same scenario I had experienced. At this point, I realized that I had likely been misled by Mario and that the product I purchased was not actually health insurance, but rather a medical discount plan. My child needed actual health insurance, which is what I was searching for, told Mario I needed, and which he led me to believe I purchased. I began to feel even more anxious and was worried that my child would not have the health insurance she needs.

14. I remembered from previously calling Mario at 954-606-9070, that the automated system provided an option for cancelling the policy, so I called back. I selected the option to cancel the policy and spoke with Nathaniel, who said he was a Senior Case Manager at Simple Health. I told Nathaniel the reason for my call and he said he would be glad to help me. He asked me for my child’s name, the phone number on the account, the address and email address, all of which I provided. Nathaniel asked me to hold while he accessed the account. When Nathaniel came back, he asked me again how he could help me. Again, I told him I wanted to cancel the policy for my child and make sure they would not be charging my credit card on January 2, 2018.

15. Nathaniel said he understood my issue, but in an attempt to stop me from canceling, began to describe all of the “benefits” available under the policy and asked why I wanted to cancel. I said the bottom line is that I want to cancel the policy. Nathaniel said that he could help me with this, but for my protection, it would need to be a recorded conversation. I said that was fine. Then Nathaniel said that he would need to talk with my child, the intended policyholder, in order to cancel. I asked him why he needed to speak to my child today when Mario did not need to speak with my child during my initial call. He said it is Simple Health’s policy and he was just “doing his job.”

16. At this point, I was tired of being nice. I threatened to contact the Insurance Commissioner for the State of Florida, my local news channel, and told him that I would report all of the fraud complaints I had found online against their company. I told him that I would be sure to share my experience with my social media networks and the other parents of my daughter’s college classmates. I demanded that he cancel the policy and email me a confirmation that the policy was cancelled and that my credit card would not be charged. He stated he could not do that, but he would have one of his “upper managers” contact me to see if they could help. I asked for the manager’s name and he said he did not know the manager’s name because it was a different department.

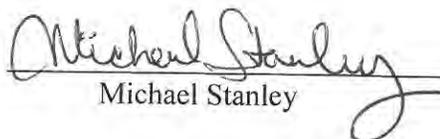
17. I felt at this point that Simple Health could not be trusted. I had been misled by Mario and now Nathaniel was refusing to honor my request to cancel the insurance plan and pending credit card charges. I told Nathaniel that I knew I had been lied to and I knew the product Mario sold me was not insurance, but rather a medical discount plan. I told Nathaniel I did not want to hear from Simple Health again and that I would handle this issue by working with the relevant government agencies.

18. At this time, I also took screen captures of the “Official-Plans.com” homepage. True and accurate copies of those screen captures are attached hereto as M. Stanley Attachment A. The captures accurately show the Official-Plans homepage as I saw it both on October 10, 2017, when I first visited, and then again on October 13, 2017, when I took the screen captures.

19. About 90 minutes later, I received a phone call from 754-802-3837. The caller said his name was Christopher Fanfan and that he was calling from the Compliance Department of “Simple Health.” He asked me again for the information on the application so he could access the right account. I decided to try one last time to deal with Simple Health, and gave him the information. I reiterated to him that I wanted to cancel the policy and receive an email confirming the cancellation and that my credit card would not be charged on January 2, 2018. Christopher told me that he would submit a request for the application to be cancelled, and that all of the personal information I provided would be deleted from Simple Health’s electronic records. I said that is fine, but could I please receive an email for confirmation purposes. He stated that they could not generate an email for a policy that was not activated as the emails are automatically generated from active accounts. I even asked him if he could simply send me an email confirming our discussion. He stated he could not. However, he did give me his direct number to call him at 754-802-3837 if I had any other questions or concerns.

20. I believe that Simple Health set out to deceive me. I was searching online for health insurance, not a medical discount plan. A medical discount plan would not have satisfied the requirements that my daughter's school has for her, nor would it have provided her the coverage that I would want her to have.

Executed on December 15, 2017.


Michael Stanley

M. STANLEY
ATTACHMENT A



You are 60 seconds away from finding the LOWEST health insurance price with the best plan for you (and your family).

Miss the Enrollment Deadline?
Don't Worry - **We Can Help!**

MM



DD



YYYY



Height

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Weight

lbs

First Name

Last Name:

Street Address

City

State

Last Name:

Street Address

City

State

Zip:

Email:

Contact Number: