

DECLARATION OF VICKI SKORDILIS
PURSUANT TO 28 U.S.C. § 1746

I, Vicki Skordilis, hereby declare as follows:

1. My name is Vicki Skordilis. I live in Ohio 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. In early November 2016, I was looking online for major medical health insurance during the open enrollment period for Obamacare. I wanted to purchase health insurance for myself and my son that would comply with the Affordable Care Act's ("ACA") requirements. After searching online for resources, I submitted my contact information to a website offering health insurance, and received several calls in return. On or about November 14, 2016, I spoke with someone named Joshua Smith from a company called Simple Health.

3. Joshua took some basic information about my son and me. I told him that I wanted to purchase major medical health insurance. He told me that he could offer me a plan, for which Coventry was the carrier, and it was somehow also related to Aetna, but I do not remember exactly how. These were insurance company names I was familiar with, so I felt comfortable that he was offering me quality health insurance.

4. I am a retired nurse, and having worked in health care, I knew exactly what kind of coverage I wanted, so I asked Joshua many very specific questions. I asked Joshua about the costs for checkups, for routine tests such as pap smears and mammograms, and coverage for surgery. I took notes while talking with Joshua, and a true and correct copy of those notes are attached hereto as **Skordilis Attachment A**. As reflected in my notes, Joshua told me that one checkup per year would be covered fully, along with one pap smear. He told me that a mammogram would be covered except for a \$75 co-pay that applied to all imaging services.

Joshua also told me that this was a PPO plan with nationwide coverage, and that I would be able to choose any doctor or hospital.

5. When I asked about coverage for surgery, Joshua said that this insurance plan had an 80/20 split for coverage of inpatient or outpatient surgeries, no deductible for hospitalization, and a maximum out of pocket expense of \$1,250 per person per year. I understood that to mean that I would be responsible for 20% of the costs associated with surgery, up to a total of \$1,250 per person, per policy year. Joshua also told me that urgent care visits would require a co-pay of \$35 and emergency room visits would require a co-pay of \$50. When I asked about prescription coverage, he told me that my out of pocket cost for generic prescriptions would be \$3-\$6 and it would be \$15-\$40 for name brand prescriptions.

6. After detailing the coverage provided by this health insurance plan, Joshua told me that the cost would be \$312.59 per month with an application fee of \$125. Based upon Joshua's answers to my questions about specific coverages, I agreed to purchase this health insurance for my son and me. I understood that I was purchasing major medical insurance, as described by Joshua.

7. Ultimately, Joshua transferred me to another person for the remainder of the call, but I do not recall that person's name, or any specific information that person provided.

8. Within a few days after the telephone call with Joshua, I received insurance cards in the mail that referenced companies called First Health and Axis. The cards were sent along with some information that indicated the purchase from Simple Health somehow involved a company called Health Insurance Innovations, or "HII." Joshua never mentioned HII or Axis when I spoke with him, although he did mention that I would have access to the First Health network of providers.


9. In the months that followed my purchase from Simple Health, I experienced some health issues that required physician visits, as did my son. Claims related to my care and my son's have been submitted, and I have received responses from a company called Administrative Concepts, or "ACI," indicating that not even one of the visits or procedures has been covered. As a result, I have racked up thousands of dollars in medical bills, and HII and Simple Health have been no help at all. It seems that everything Joshua told me was a lie – the plan he sold me was worthless, and not major medical insurance at all.

10. In attempts to get my claims paid, I have called Simple Health, HII, and ACI, which someone from HII directed me to. When I call Simple Health, the representatives hang up on me. HII simply directs me to ACI. In February 2018, I filed another claim with ACI. After receiving a collections notice regarding some of the bills for my medical care, I called ACI on February 16, 2018 and spoke with Dee Ianniello. She said it was that company's responsibility to process and pay claims, but to date, claims have still not been paid as I expected they would be based on Joshua from Simple Health's representations. I paid for this worthless plan for more than a year until I canceled it in February 2018. That same month, I filed a complaint with the Florida Attorney General's Office about my experience with Simple Health.

11. I am outraged that Joshua blatantly lied to me in response to my very specific questions about coverage issues. Having worked as a nurse for my entire career, I am an educated consumer when it comes to health insurance, and yet he deceived me. I cannot imagine how many people Simple Health has lied to and caused to incur thousands of dollars in medical debt.

I state under penalty of perjury that the foregoing statement is true and correct.

Executed on April 28, 2018.



Vicki Skordilis

Skordilis Attachment A

11/14/16

Cost 954-606-9070
Simple Health
~~1-888-993-5767~~

Agent → Joshua Smith → 1800 594-4046 ex 11
Simple Health → Brokerage

PPO plan #ALM003155

of referrals needed:

Chose ~~any~~ Dr. or hosp. with nationwide coverage

100% free ✓ up per year
" pap. " "
" mammogram " "

954-606-9070
Customer Service

Imaging services copay \$75 per service

Prescription coverage - pay \$3 to \$6 out of pocket
pay \$15 to \$40 out of pocket name brand

- ✓ surg 80/20 in or out pt.
- ✓ hosp → deductible 80/20 → E. max out of pocket 1,250 Per Person
- ✓ ~~ER~~ urgent care \$35 copay
- ✓ ED \$50 copay
- ✓ Tell a Doc → free

Simple Health \$312.59 monthly
- 125 app fee

Cost

Authorized bank payment
of life ins./accident ins. \$437.59 on 11/14/16
Major Medical