

**DECLARATION OF CURTIS CONNER**  
**PURSUANT TO 28 U.S.C. § 1746**

I, Curtis Conner, hereby declare as follows:

1. My name is Curtis Conner. I live in Texas 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 February 26, 2018, I received an email with the subject "Find Out About TrumpCare Today. Open Enrollment is Here." A true and correct copy of the email is attached hereto as **Conner Attachment A**. The email said that it was from "Trumpcare-AHCA" at email address [stuffgeek29@deskroute.net](mailto:stuffgeek29@deskroute.net). I found this email interesting, because as someone who works in the insurance field, I know that there is no such thing as "TrumpCare" and that the open enrollment period for the Affordable Care Act had long since passed by February 26, 2018.

3. I was upset that the intent of this email was to mislead consumers who might not know as much about health insurance as I do. I care about this issue professionally, as a licensed insurance agent, and personally, because my mother once fell victim to a health care-related scam. I decided to follow the link in the email and call the telephone number on the linked website, which was (844) 806-4024. I called, and after answering a few basic questions, I was transferred to another person.

4. When the second representative answered the telephone, I asked him who he worked for. He said that he worked for a company called Simple Health. He asked me some questions about my medical history, and I decided to play along to see what he ultimately would try to sell me. I pretended to be an age other than my own, and provided different medical information. The Simple Health salesperson told me that he had policies to offer me for major medical health insurance. He rattled off the names of many major insurance companies,

including Aetna, Blue Cross-Blue Shield (“BCBS”), Cigna, and United Healthcare. I know all of these companies to be major players in the health insurance marketplace, but only BCBS is available on the individual market in Texas. I also knew that because the Affordable Care Act’s open enrollment period was over, even the BCBS policies were no longer available.

5. The Simple Health salesperson described a major medical health insurance plan to me. He said it was a PPO, with co-pays for physician visits, and a \$5,000 deductible. Based on my experience in the insurance industry, I know that PPO, co-pay, and deductible are terms that have specific meanings and are generally associated with major medical health insurance, not indemnity or discount plans. A PPO health insurance plan provides coverage for care received within a “preferred provider” network. The Simple Health salesperson told me that the plan he described would cost \$184 a month. That alone was enough to confirm that this was unquestionably a scam. There is no way that the major medical plan he described could be purchased for a monthly premium that low.

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

Executed on May 8, 2018.

  
Curtis Conner

# Eqppgt Attachment C



-----Original Message-----

From: Trumpcare-AHCA <stuffgeek29@deskroute.net>

To: [REDACTED].com>

Sent: Mon, Feb 26, 2018 5:22 pm

Subject: Find Out About TrumpCare Today. Open Enrollment is Here.

[Find Out About TrumpCare Today. Open Enrollment is Here.](#)

