

DECLARATION OF JANE HACKETHAL
PURSUANT TO 28 U.S.C. § 1746

I, Jane Hackethal, hereby declare as follows:

1. My name is Jane Hackethal. I live in Illinois 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 November 30, 2017, I was looking online for health insurance and submitted my contact information to a website advertising health plans. Moments later, I received a call from a telemarketer who identified himself as a representative of Simple Health Plans. I continued to receive additional calls from other health insurance companies as I spoke to the Simple Health agent, who told me to ignore these calls.

3. At the time, I was paying \$688 per month for so-called "COBRA" insurance through my former employer that only covered me. As I explained to the agent, I wanted to find affordable major medical insurance. The agent, whose name I cannot recall, promised that he could find wonderful health insurance for me at a reasonable price.

4. I made a point of telling the agent that I needed major medical insurance with low deductibles and co-pays that covered prescription medications and pre-existing conditions. I mentioned many of my health conditions and the medications that I took to treat these conditions. I emphasized that I wanted a policy that would allow me to keep my current doctors. As an example, I noted that I have been under the care of the same cardiologist for several years. I explained that I needed a plan that included my cardiologist in its network and that would allow me to see him as needed without obtaining special approvals or referrals. The agent assured me that he would find a plan that enabled me to see any doctor I wanted and would also cover all of my pre-existing conditions and current medications.

5. After asking a few background questions about me, the agent claimed that I qualified for a PPO health insurance policy through First Health with no deductibles, nominal co-pays, and prescription coverage. I am familiar with First Health because my husband used to have this insurance through a former employer. Knowing that I would be covered through First Health provided an extra measure of comfort. When I asked how Simple Health could offer high quality health insurance at such a low price, the agent explained that the key was enabling consumers to pay only for the coverage that they need. For example, he knew that I did not need maternity care and claimed that he could offer a policy without this coverage at a reduced price. He also claimed that Simple Health had access to openings in-group health insurance plans that were not available to the general public.

6. The agent quoted a price of approximately \$514 per month plus a \$145 enrollment fee. This seemed like a great deal, certainly better than my current insurance or anything else I had been able to find on my own. When I asked whether the policy would be a qualified plan under the Affordable Care Act, the agent did not directly answer my question, rather, he gave a completely separate and confusing response. He said that while my income made me ineligible for ACA subsidies, if anyone asked how I obtained this policy, I should say that I could not afford the insurance that I needed. I understood this to mean that I would be receiving an ACA-qualified plan through some sort of loophole. This did not feel right to me at the time. The enrollment fee charged by Simple Health also seemed a bit odd. However, I think that the relief of finally finding affordable, quality health insurance clouded my judgment a little. In hindsight, I wish that I had been more skeptical. Regardless, I understood that Simple Health would provide me with a major medical health insurance policy at a price within my budget.

7. After providing my debit card information to the agent, he transferred me to the verification department. The verification representative quickly read a number of disclosures and asked if I both understood and agreed to these statements. It was impossible to follow so much complex information coming at me so quickly. I felt pressure to agree to everything because the verification employee warned that if I asked any questions, he would need to transfer me back to the sales agent where the process would start all over again. Indeed, I already went through this process once before and because I asked a question, I had to start the process again, so I did not want to repeat this hassle.

8. At some point during the call or shortly thereafter, I received an email from a company called Health Insurance Innovations (“HII”) about my “Application for Legion Limited Medical.” A true and correct copy of this email is attached hereto as **Hackethal Attachment A**. The email did not mention anything about First Health or the benefits described by the Simple Health agent. Instead, it indicated that I had enrolled in a “limited benefit plan” along with “accident insurance” and something called Freedom Spirit Plus. The email described the coverage provided by these plans in a way that seemed substantially different than – and inferior to – what the Simple Health agent led me to believe. This concerned me.

9. My bank account statement indicated that on December 1, 2017, HII withdrew \$514 from my bank account and on December 2, 2017, a different company withdrew \$60. I called the telephone number that appeared with the charges to request a copy of the policy documents. I do not know whether this was a telephone number for HII or Simple Health. The representative who took my call claimed that she could not provide the plan documents before the start of coverage. This made me even more suspicious.

10. In another conversation with a different representative, I tried unsuccessfully to cancel. The representative effectively refused my request, justifying her refusal by explaining that I could receive a full refund within 30 days if I was not completely satisfied. By this point, I had lost all trust in Simple Health and HII. Convinced that I had been scammed, I canceled my debit card in order to prevent Simple Health and HII from withdrawing any more money from my bank account.

11. After canceling my debit card, I received a few calls from Simple Health or HII asking for a new method of payment for the monthly premiums. I refused to make any additional payments and demanded my money back. At some point, I reported this issue to my bank and canceled my debit card. Although my bank canceled my debit card, they charged about \$25. The bank stated that because I voluntarily provided my debit card information under agreement to purchase the health plan, it would charge a \$25 fee to issue a new debit card.

12. On January 4, 2018, HII refunded \$514.15 of my \$574 initial payment and it kept the \$145.00 enrollment fee. I never received the remaining \$60. Given the way Simple Health misrepresented itself and the product it sold me, I believe that I am entitled to the remaining \$60.

13. During my 23 years as a nurse, I have cared for countless extremely ill patients, including people suffering from cancer, so I know that having quality health insurance is incredibly important. While my own experience with Simple Health was frustrating and stressful, it infuriates me to think of how this company is exploiting vulnerable, desperate people who are not as capable as I am of protecting themselves.

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

Executed on April 30 2018.



Jane Hachethal

Hackethal Attachment A

From: support@hiiquote.com <support@hiiquote.com>
Sent: Thursday, November 30, 2017 7:57:02 AM
To: [REDACTED]
Cc: licensing@hbcinsure.com
Subject: Jane Hackethal - Your Application for Legion Limited Medical



Dear Jane Hackethal,

Thank you for applying for Limited Benefit Health Insurance, underwritten by AXIS Insurance Company through Health Insurance Innovations.

Your plans will begin on the effective dates listed below. If you applied for more than one plan, like a supplemental plan, or purchased another benefit or service, please note that it will be billed separately. If your plan terminates or you cancel it, any other plans, benefits or services you have will remain effective unless you tell us you'd like to cancel.

Hackethal Att. A, pg.1



Your Coverage & Effective Dates

Legion Limited Medical with an effective date of 12/01/2017.

Freedom Spirit Plus with an effective date of 12/01/2017.

Safeguard Accident Insurance with an effective date of 12/01/2017.



The Documents You Need

All of the details about your coverage are available for you online at HIIQuoteCustomers.com.

Can I access my Membership Materials now?

Yes. You may access your Membership Materials now by registering here. Once logged in you will be able to download copies of your Insurance Certificate(s), temporary ID Cards, Benefit Information and much more. You may also request a copy of these materials be mailed to you at no additional cost by calling Customer Service (877) 376-5831.

Please read the details carefully. We've created a user ID and password for you, so you can:

- Log in immediately
- View and download the details about your coverage
- Print duplicate ID cards if you need them

How do I make changes or update my contact information?

You may make changes to your contact information by calling Customer Service 877-376-5831.

You will also receive a welcome letter in 7-10 business days that includes your ID card.

User ID: [REDACTED]
Password: [REDACTED]

For your security, please Update your password after logging in.



Understanding Your Plan

We know things can get complicated when it comes to insurance. That's why we're committed to helping you understand your plan and how to use it.

Limited Benefit Health Insurance plans can supplement your existing healthcare coverage. In the case of serious injury or medical illness, these plans can provide much needed financial peace of mind, as major medical policies do not always cover the full cost of certain health concerns.

We want your plan to work for you. Here are a few benefits your plan provides:

- Next day coverage
- No waiting period for accidental injuries or sickness
- Freedom to choose any provider or hospital

Limited Benefit Health Insurance is not considered "minimal essential coverage" under the Affordable Care Act and you may be subject to tax penalty.



Eligibility, Benefits & Claims Services

Administrative Concepts, Inc.
1.800.715.1341



Billing & Customer Service

Health Insurance Innovations
1.877.376.5831
Monday - Friday 8:30am to 7:00pm EST
HIIQuoteCustomers.com



30 - Day Free Look Your Satisfaction Is Important

We want you to be happy with your coverage. If you find that you've purchased your plan in error or it's just not the right plan for you, you can cancel your plan, as long as no claims have been filed, within 30 days of your receipt and you'll get your money back-guaranteed.

Health Insurance Innovations
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www.hiiquote.com
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