IN THE MATTER OF: ***Department of Insurance***

AMERICAN TRADE ASSOCIATION et al. HEARING NO. 10-HR-0153

AUTHORITY TO CONDUCT HEARING

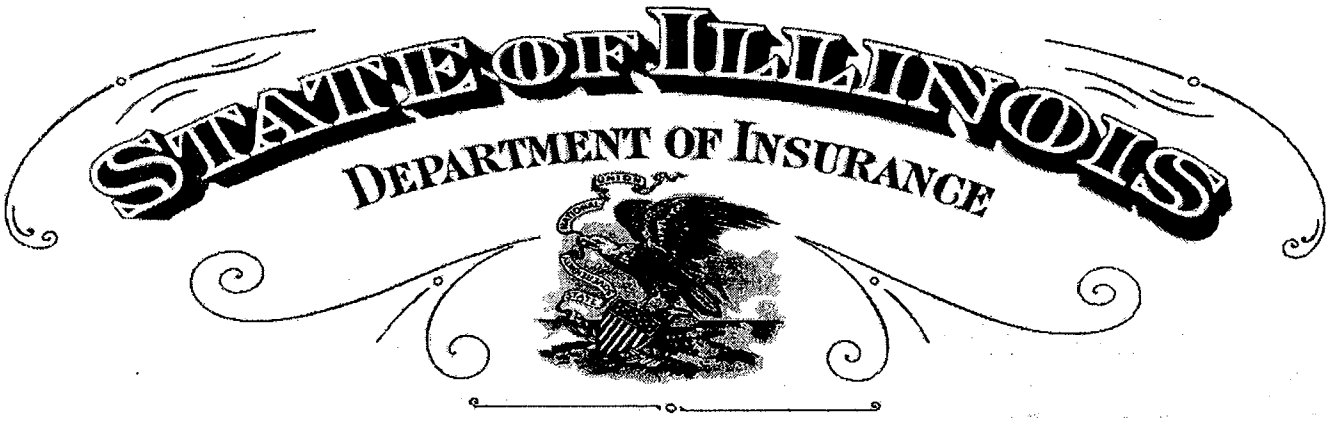
I, the undersigned, Director of the Department of Insurance of the State of Illinois, pursuant to Sections 401, 402 and 403 of the Illinois Insurance Code (215 ILCS 5/401, 5/402 and 5/403) designate and appoint Tim Cena, an employee of the Department of Insurance, State of Illinois, as Hearing Officer to conduct a Hearing in the above-entitled matter, to be held in the Office of the Department of Insurance, 320 W. Washington, 4th Fl., Springfield, Illinois, on March 3, 2010 at the hour of 10:00 A. M., or as soon thereafter as the business of the Department of Insurance will permit.

The Hearing Officer so designated by the Director will be empowered to administer oaths, examine witnesses and require the production of any books, records, documents or papers relevant to the inquiry.

Date: 9 February 2010

DEPARTMENT OF INSURANCE
of the State of Illinois;

Michael T. McRaith
Director of Insurance



IN THE MATTER OF:

Hearing No. 10-HR-0153

American Trade Association
4676 Highway 41 North
Springfield, TN 37172

Obed Kilpatrick
4676 Highway 41 North
Springfield, TN 37172

American Trade Association, c/o Incorp. Services, Inc.
455 W. Maurice
Hot Springs, AR 71901

Smart Data Solutions, LLC
4676 Highway 41 North
Springfield, TN 37172

Bart Posey
4676 Highway 41 North
Springfield, TN 37172

Serve America Assurance Ltd
c/o Beema-Parkistan Company, Ltd
412-427 Muhammadi House
I.I. Chundriga Road
P.O. Box 5626
Karachi 74000 Pakistan

Serve America Assurance Ltd
117 Winding Way
Blythewood, SC 29211

Serve America Assurance Ltd
c/o Kathleen Cauthen
117 Winding Way
Blythewood, SC 29211

Real Benefits Association
118A Fulton Street
Box 138
New York, NY 10038

Dave Clark
118A Fulton Street
Box 138
New York, NY 10038

ORDER TO CEASE AND DESIST

YOU ARE HEREBY ORDERED, pursuant to Section 401.1 of the Illinois Insurance Code (215 ILCS 5/401.1), to immediately CEASE AND DESIST any and all practices and activities with respect to the solicitation, negotiation or effectuation of insurance coverages in Illinois specifically including, but not limited to, health insurance plan coverages placed through one or more of the above mentioned entities or individuals (the Parties) assume all or part of the risk attendant to such coverages.

YOU ARE NOTIFIED that you shall not advertise, solicit, sell; collect premiums; issue, mail or deliver policies, contracts, certificates of insurance coverage or benefits, applications, or any other evidence of insurance coverage participation nor shall you enter into any other contract or agreement which purports to provide insurance benefits effecting Illinois residents wherein the Parties or their subsidiaries, successors or affiliates are performing acts by or on behalf of an unauthorized insurer, unless and until such time that you meet all of the licensing requirements of the Illinois Insurance Code and Department of Insurance regulations.

YOU ARE FURTHER NOTIFIED, in accordance with Section 401.1 of the Illinois Insurance Code, that the basis for this Order to Cease and Desist is that it appears that you are conducting an insurance business without statutory authority and further that you are engaged in unlawful acts, practices and transactions in violation of Section 121 of the Illinois Insurance Code (215 ILCS 5/121) to wit:

The transaction of insurance business in this State without first procuring a certificate of authority from the Director of Insurance, which pursuant to Section 188 of the Illinois Insurance Code (215 ILCS 5/188) would constitute grounds rendering you subject to conservation, rehabilitation or liquidation proceedings.

YOU ARE FURTHER NOTIFIED because you are operating in violation of the law, irreparable loss and injury to the property of others may have or may occur unless this **ORDER TO CEASE AND DESIST** is issued forthwith.

YOU ARE FURTHER NOTIFIED pursuant to Section 121 of the Illinois Insurance Code, that nothing herein shall relieve you of any obligation, duty or performances you may have incurred in the course of your activities in this State nor does it impair the validity of any act or contract.

NOTICE OF HEARING

YOU ARE FURTHER NOTIFIED, pursuant to Sections 401, 401.1, 402 and 403 of the Illinois Insurance Code (215 ILCS 5/401, 5/401.1, 5/402, and 5/403), that a Hearing will be held on March 3, 2010 at 10:00 A.M. in the Offices of the Illinois Department of Insurance, 320 West Washington, Fourth Floor, Springfield, Illinois, or as soon thereafter as the business of the Department will allow before the Director of Insurance of the State of Illinois, or such authorized Hearing Officer as the Director may designate. The Director of Insurance or such Hearing Officer will be empowered to administer oaths, examine witnesses and require the production of any books, records, documents or papers relevant to the inquiry.

YOU ARE FURTHER NOTIFIED that the purpose of this Hearing is to determine whether you are conducting insurance business and affairs and whether you are engaged in unlawful acts, practices, and transactions in violation of Section 121 of the Illinois Insurance Code to wit:

Transacting insurance business in this State by marketing to and entering into insurance contracts with residents of this State without first procuring a certificate of authority from the Director of Insurance.

YOU ARE FURTHER NOTIFIED, pursuant to Section 401 of the Illinois Insurance Code that all areas of your businesses and business activities subject to the jurisdiction of the Director of Insurance of the State of Illinois may be inquired into in this hearing.

YOU ARE FURTHER NOTIFIED that this Hearing will be conducted in accordance with 50 Ill. Adm. Code 2402 which governs administrative hearing procedures, and that pursuant to Section 408(5) of the Illinois Insurance Code (215 ILCS 5/408(5)) and 50 Ill. Adm. Code 2402.270 the Director may order that the costs of this Hearing be assessed against you.

YOU ARE FURTHER NOTIFIED that at the time and place set forth above you must appear and you may present such testimony and evidence as you desire and you may be represented by legal counsel of your own choosing.

YOU ARE FURTHER NOTIFIED that all requests for continuances of this Hearing must be served upon the Department of Insurance and its attorney in writing not less than five (5) days prior to the date of Hearing.

YOU ARE FURTHER DIRECTED to acknowledge receipt of this Order and Notice to the Department of Insurance, State of Illinois and to notify the Department of the name of legal counsel, if any, who will appear on your behalf.

YOU ARE FURTHER NOTIFIED that the State of Illinois requires all persons, prior to entering the Department's Offices, to present one of the following forms of photo identification:

- Valid driver's license or valid identification card from any U.S. state;
- Valid U.S. passport or valid passport issued by another country;
- Any valid military identification; any valid picture identification issued by a government entity within the U.S.; or
- Valid identification issued by a foreign consulate.

FAILURE TO PRESENT AN ACCEPTABLE FORM OF IDENTIFICATION COULD RESULT IN YOUR BEING DENIED ACCESS TO THE DEPARTMENT'S OFFICES.

YOU ARE FURTHER DIRECTED that your legal counsel, if any, must file a written appearance with the Department of Insurance at the address specified above.

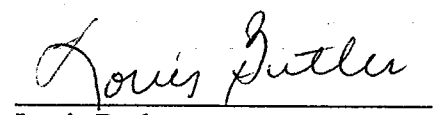
DATE: 9 February 2010

DEPARTMENT OF INSURANCE

Michael T. McRaith
Director

NOTICE OF APPEARANCE

Pursuant to 50 Ill.Adm. Code 2402 the undersigned hereby enters an appearance as attorney for the Department of Insurance.



Louis Butler
Staff Attorney