DECLARATION OF MAILING
I declare under penalty of perjury under the laws of the State of Washington that on the date listed below I mailed or caused delivery of a true copy of this document to all names listed
DATED this 19th day of January, 2007
at Olympia, Washington.
Signed: Nancy Hilty

MIKE KREIDLER
STATE INSURANCE COMMISSIONER

STATE OF WASHINGTON

OFFICE OF
INSURANCE COMMISSIONER

Phone: (360) 725-7000

In the Matter of

Dayspring Management, LLC; Premier Club Benefits; Premier Club Services; RJ Wilson and Associates, Ltd; Medical Benefits Administrators of Maryland, Inc.	)	No. **D 06-377**
Unauthorized Entities, and	)	
Ronald Jack Wilson, et al.	)	**ORDER TO CEASE AND DESIST**
Principals	)	

Pursuant to RCW 48.05.030, RCW 48.15.020, RCW 48.15.023, RCW 48.17.060, RCW 48.17.063, RCW 48.30.010, RCW 48.30.040, and RCW 48.125.020 the Office of the Insurance Commissioner ("OIC") orders the entities and the individuals named above and their officers, directors, trustees, agents, employees, associates and affiliates ("**Respondents**") to immediately cease and desist from:

A. engaging in or transacting the unauthorized business of insurance in the State of Washington, including the collection or attempted collection of premium monies and the advertising of unauthorized insurance and unauthorized insurance-related products;

B. seeking, soliciting, pursuing, continuing and/or obtaining any unauthorized insurance business in the State of Washington and from participating, directly or indirectly, in any act of an insurance agent or insurance company in seeking, soliciting, pursuing, continuing and/or obtaining any unauthorized insurance business in the state of Washington;

C. soliciting Washington residents to sell or purchase any plan or policy or coverage for any unauthorized form of insurance;

D. soliciting Washington residents by e-mail, facsimile (fax), telephone, mail or any other means to induce them to purchase any unauthorized form of insurance product.

Mailing Address: P.O. Box 40255 • Olympia, WA 98504-0255
Street Address: 5000 Capitol Blvd. • Tumwater, WA 98501

E. offering to Washington residents a plan or policy or coverage for any form of insurance without submitting to examination by the insurance commissioner to determine the organization and solvency of the person or the entity offering such insurance, and to determine whether or not such person or entity complies with the applicable provisions of the Insurance Code as required by RCW 48.

THIS ORDER IS BASED ON THE FOLLOWING:

1. Violation of RCW 48.05.030, Certificate of authority required; RCW 48.15.020, Solicitation by unauthorized insurer prohibited; RCW 48.17.060, License required; RCW 45.125.020, MEWA certificate of authority required.

a.) On or about October 28th, 2005, and continuing to the present time, Respondents solicited Washington residents and did sell a plan or policy or coverage for employee health insurance to Washington residents. Respondents have not applied for or been granted, a certificate of authority or license to act as an insurance agent, a Multiple-Employer Welfare Arrangement (MEWA) or an insurer for this product in Washington. Respondents have not submitted to OIC any appropriate certificate, license, or other document issued by another agency of this state, any subdivision thereof, or the federal government permitting or qualifying Respondents to provide such coverage in this state. Respondents have also not registered with the OIC as risk retention or risk purchasing agents, nor have they transacted this insurance through a licensed surplus lines broker in this state.

b.) On or about January 3rd, 2006, Respondents submitted a written statement to this office arguing that the product sold is in fact an "association benefit program" but quoting provisions of the federal ERISA as justification and declaring that they are subject to federal regulation only. This is contrary to RCW 48.15.023 and RCW 48.01.020.

c.) In this same letter, Respondents stated that "...the only insurance entity in your letter, to my knowledge and belief has not offered or placed any insurance or insurance product in the State of Washington." This statement was issued while Respondents were actively soliciting insurance business with Washington residents and, in the exhibits attached to this letter, admitted that they presently had at least three insurance customers in Washington.

2. Violation of RCW 48.30.010 and RCW 48.30.040, Unfair Practices and False information and advertising

Respondents intentionally represented to the purchasers that the product they were selling was being legally offered under the laws of the State of Washington or was exempt from such laws. This representation was false, deceptive and misleading, in that the Respondents were fully aware that they were not authorized to issue an insurance contract under RCW 48. This misleading representation was intended to induce Washington residents to sell or purchase the insurance product sold by the Respondents.

Respondents, under some of the same and other names, have been previously served with Cease and Desist orders from other jurisdictions in which they have attempted to perpetrate similar sham insurance transactions.

Any violation of the terms of this Order by Respondents, their officers, directors, trustees, agents, employees, associates, or affiliates will render the violator(s) subject to the full penalties authorized by RCW 48.02.080, 48.15.023, 48.17.530, and other applicable Code sections.

Respondents are ordered, within forty-five (45) days of receipt of this order to furnish the OIC with a complete listing, to include contact information, of all Washington residents who have purchased any insurance or insurance-related product from Respondents.

Respondents are further ordered, within fifteen (15) days of receipt of this order, to notify all Washington residents with whom such insurance business has been transacted or solicited of the existence and full content of this order.

Respondents have the right to demand a hearing pursuant to chapters 48.04 and 34.05 RCW. This Order shall remain in effect subject to the further order of the commissioner.

THIS ORDER IS EFFECTIVE IMMEDIATELY AND IS ENTERED at Tumwater, Washington, this 18th day of January, 2007.

MIKE KREIDLER
Insurance Commissioner

By: Charles D. Brown
Charles D. Brown, Senior Staff Attorney
Legal Affairs Division
Office of Insurance Commissioner
State of Washington