

FILED

MAY 7 2026

Department of Insurance
State of Idaho

RAÚL R. LABRADOR
Attorney General

Matt K. Steen – ISB No. 10285
Deputy Attorney General
Idaho Department of Insurance
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Attorneys for Idaho Department of Insurance

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

EXOUZA INC., a Virginia corporation
holding Idaho Pharmacy Benefit Manager
License No. 3003481326,

Respondent.

Docket No. 18-4713-25

STIPULATION AND FINAL ORDER

COME NOW the staff of the Idaho Department of Insurance (“Department”) and EXOUZA INC. (“Exouza”) and do hereby agree and stipulation as follows:

FINDINGS OF FACT

1. Exouza is a licensed pharmacy benefit manager in the state of Idaho, holding Pharmacy Benefit Manager License No. 3003481326. Exouza is subject to the provisions of title 41, Idaho Code, and to the rules of the Idaho Department of Insurance promulgated thereunder.

2. The Director of the Department (“Director”) has jurisdiction over Exouza and the

subject matter herein pursuant to the provisions of Idaho's Producer Licensing Act, Idaho Code §§ 41-1001 *et seq.*, as well as the Idaho Insurance Code, Idaho Code §§ 41-101 *et seq.*

3. On July 24, 2025, the Department filed a Verified Complaint and Notice of Right to Hearing, ("Complaint"), seeking the imposition of administrative penalties against Exouza.

4. Among the allegations in the Complaint were that:

- i. Exouza violated Idaho Code §§ 41-349(10)(a)(i) and (10)(b) by failing to file with the Department its Annual Compliance Report for the year 2024 by April 1, 2025; and
- ii. Exouza violated Idaho Code § 41-349(10)(a)(ii) by failing to file with the Department its Formulary Changes Report for the year 2024 by April 1, 2025; and
- iii. Exouza violated Idaho Code § 41-349(13)(d) by failing to file with the Department its MAC Appeals Report for the months of October through December 2024 by April 1, 2025; and
- iv. Exouza violated Idaho Code § 41-349(13)(d) by failing to file with the Department its MAC Appeals Report for the months of January through March 2025 by July 1, 2025.

5. On August 18, 2025, the Department filed an Order of Default seeking an administrative penalty for failing to file an answer to the Complaint and for failing to request a hearing regarding said Complaint as allowed under Idaho Code § 232.

6. Exouza has not filed its annual compliance report for 2025, its formulary changes report, or its MAC appeals report for the first quarter of 2026, as required by §§ 41-349(13)(d) and 41-349(10)(a)(ii).

7. Exouza has represented to the Department that it is not conducting business in Idaho and has no intention of doing so, and therefore desires to surrender its license.

CONCLUSIONS OF LAW

8. Idaho Code § 41-349(9) provides that if the Director finds a pharmacy benefit manager has violated any provision of title 41, Idaho Code, then the Director may subject the pharmacy benefit manager to any or all of the actions, penalties, and remedies referenced in Idaho Code §§ 41-117, 41-1016, and 41-1026.

9. Idaho Code § 41-117 provides that each instance of violation may be treated as a separate offense.

10. The parties agree that this matter may be brought to a close by a negotiated and stipulated settlement and entry of this Stipulation and Final Order.

AGREEMENT

11. Based upon the foregoing, Exouza and the Department stipulate and agree as follows: Exouza admits to four (4) violations of Idaho Code § 41-349 as referenced above.

12. As sanction for the violations referenced above, Exouza and the Department agree to the penalties set forth below and agree that the Director may enter the Final Order attached hereto, which provides as follows:

- i. That the Stipulation be adopted in full and incorporated into the Final Order;
- ii. That Exouza shall pay an administrative penalty of ten thousand dollars (\$10,000) as a global settlement for violations of title 41-349 as contained herein; and
- iii. That Exouza shall immediately surrender its Idaho Pharmacy Benefit License No. 3003481326 to the Department.

13. By entering into this Stipulation, Exouza knowingly and voluntarily waives any rights it would otherwise have to notice and a hearing at which it may be represented by counsel, present evidence, and examine witnesses. The parties hereto further waive their right of reconsideration, appeal, and other rights as set forth in title 67, chapter 52, Idaho Code, including the right to submit this matter for review by a court of competent jurisdiction.

14. The parties agree that the terms of this Stipulation and Final Order are appropriate and proper under the circumstances referenced herein.

15. Exouza acknowledges that it has read this Stipulation and Final Order and understands its contents; that it has been given the opportunity to discuss this Stipulation and Final Order with independent legal counsel of its choosing; and that it has entered into this Stipulation knowingly, voluntarily, and with full knowledge of any rights it may be waiving thereby.

16. Exouza acknowledges that this is an administrative action that may be required to be reported on license applications and license renewal forms and disclosed to other agencies through which Exouza holds a license.

17. This Stipulation is subject to approval by the Director or the Director's designee and shall become effective and binding upon the Department and Exouza upon such approval. Should the Director decline to approve this Stipulation and Final Order, the Department and Exouza shall retain all of their rights, claims, and/or defenses, and any factual and/or legal admissions made by Exouza herein shall be withdrawn.

18. This Stipulation constitutes the full and final resolution of all matters addressed herein, and the Department agrees that, subject to the Director's approval described above, the Department shall seek no further civil or administrative sanctions for the specific violations alleged in the Complaint, subject to the agreement set forth in Paragraphs 9 and 10 above.

19. Exouza agrees that, upon execution of this Stipulation and Final Order, no subsequent action or assertion shall be maintained or pursued in any manner asserting the invalidity of this Stipulation and Final Order and its provisions.


20. Exouza agrees and understands that this Stipulation and Final Order resolves only the four (4) violations set forth in the Complaint of July 2025 and those of 2026 enumerated above. Any future violations or violations discovered by, or brought to the attention of, the Department outside the scope of this agreement may be the subject of further action by the Department.

21. This Stipulation and Final Order embodies the entire agreement between the Department and Exouza, and there are no agreements, understandings, representations, or warranties that are not expressly set forth herein.

22. Upon the Director's entry of the Final Order approving this stipulation, this Stipulation and Final Order shall be a public record under the Idaho Public Records Act.

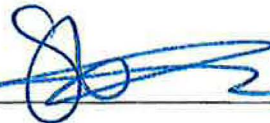
AGREED this 30 day of April 2026.

By: _____


Sushree Jain, CEO
Exouza Inc.

AGREED this 4th day of ~~April~~ ^{May} 2026.

By: _____



Shannon Hohl
Market Oversight Bureau Chief
Idaho Department of Insurance

APPROVED as to Form:

State of Idaho
Office of the Attorney General

By: _____


Matt K. Steen

Deputy Attorney General
Attorneys for the Idaho Department of Insurance

FINAL ORDER

The parties hereto, namely the Idaho Department of Insurance and Exouza Inc. ("Exouza"), having entered into the foregoing Stipulation, and the form of the order having been approved, the Director, having reviewed the same, does hereby find that there is factual basis for entry of a Final Order herein and does hereby conclude that Exouza did violate title 41, Idaho Code, as stated in the Stipulation.

NOW, THEREFORE, based on the foregoing and in consideration of the premises,

IT IS HEREBY ORDERED that the foregoing Stipulation is approved and is incorporated herein as if set forth in full and made a part hereof;

IT IS FURTHER ORDERED that Exouza is assessed an administrative penalty of ten thousand dollars (\$10,000).

IT IS FURTHER ORDERED that Exouza shall surrender its Idaho Pharmacy Benefit License No. 3003481326 to the Department.

DATED this 7th day of ~~April~~ ^{MAY} 2026.

State of Idaho
Department of Insurance



Director
Dean L. Cameron

Dean L. Cameron
Director

NOTICE REGARDING REPORTABLE PROCEEDINGS

The foregoing is considered a reportable administrative proceeding. As such, it is a public record and is public information that may be disclosed to other states and reported to companies for which you are actively appointed. This information will be reported to the National Association of Insurance Commissioners (NAIC) and will appear in the online searchable database of the Idaho Department of Insurance. You should be aware that this proceeding must be disclosed on any insurance license application and must be reported to any and all states in which you hold an insurance license.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of MAY 2026, I caused a true and correct copy of the STIPULATION AND FINAL ORDER to be served upon the following parties by the method(s) indicated below:

Exouza Inc. Susheel Jain, CEO for Exouza Inc. 1660 International Dr, Ste 600 McLean, VA 22102	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: susheel.jain@exouza.com
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Jan Noriyuki
Paralegal

FILED

AUG 18 2025

Department of Insurance
State of Idaho

Raúl R. Labrador
Attorney General

Michael Witry – I.S.B. No. 7960
Deputy Attorney General
Idaho Department of Insurance
700 W. State Street, 3rd Floor
PO Box 83720
Boise, Idaho 83720-0043
Telephone No. (208) 334-4219
Facsimile No. (208) 334-4298
michael.witry@doi.idaho.gov

Attorneys for Idaho Department of Insurance

Before the Director of the Department of Insurance

State of Idaho

Idaho Department of Insurance,

Complainant,

vs.

Exouza Inc., a Virginia corporation
holding Idaho Pharmacy Benefit
Manager License No. 3003481326,

Respondent.

Docket No. 18-4713-25

Order of Default

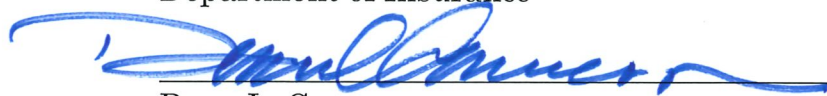
The Director of the Idaho Department of Insurance (“Director”) having reviewed the record herein; and Exouza Inc. (“Exouza”) who currently holds Idaho Pharmacy Benefit Manager License No. 3003481326, having been lawfully served the Verified Complaint and Notice of Right to Hearing (“Complaint”), a copy of which is attached hereto as Exhibit A and incorporated herein, and, as evident from the

Affidavit of Michael Witry, having failed to file an answer thereto and having failed to request a hearing regarding said Complaint; and the Director having found as a result thereof that Exouza is in default and has waived its rights regarding the opportunity for hearing; and in consideration of the above;

It is hereby ordered that Exouza, Inc. shall pay to the Idaho Department of Insurance an administrative penalty of Twenty Thousand Dollars (\$20,000).

Dated this 18 day of August 2025.

State of Idaho
Department of Insurance



Dean L. Cameron
Director

Notification Regarding Reportable Proceedings

This is considered a reportable administrative proceeding. As such, it is a public record and is public information that may be disclosed to other states and reported to companies by which you are actively appointed. This information will be reported to the National Association of Insurance Commissioners (NAIC) and will appear in the online searchable database of the Idaho Department of Insurance.

Notification of Rights

This is a final order of the agency. Any party may file a motion for reconsideration of this final order within fourteen (14) days of the service date of this order. The agency will dispose of the motion for reconsideration within twenty-one (21) days of its receipt, or the motion will be considered denied by operation of law. See Idaho Code § 67-5246(4).

Any such motion for reconsideration shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director
Idaho Department of Insurance
700 W. State Street, 3rd Floor
P.O. Box 83720
Boise, ID 83720-0043

Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order or orders previously issued in this case may file a petition for judicial review in the district court of the county in which: (1) a hearing was held; or (2) the final agency action was taken; or (3) the party seeking review of the order resides or operates its principal place of business in Idaho; or (4) the real property or personal

property that was the subject of the agency action is located.

A petition for judicial review must be filed within twenty-eight (28) days of: (a) the service date of this final order; (b) the service of an order denying motion for reconsideration; or (c) the failure within twenty-one (21) days to grant or deny a motion for reconsideration, whichever is later. *See Idaho Code § 67-5273.* The filing of a petition for judicial review does not itself stay the effectiveness or enforcement of the order under appeal. *See Idaho Code § 67-5274.*

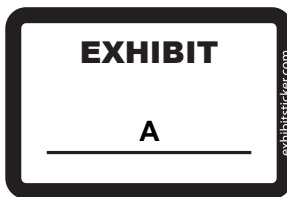
Certificate of Service

I hereby certify that on this 18th day of August 2025, I caused a true and correct copy of the foregoing Order of Default to be served upon the following parties by the designated means:

Exouza Inc. Susheel Jain, CEO 1660 International Dr, Ste 600 McLean, VA 22102	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email: susheel.jain@exouza.com
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Jan Noriyuki
Paralegal



Raúl R. Labrador
Attorney General

Michael Witry – I.S.B. No. 7960
Deputy Attorney General
Idaho Department of Insurance
700 W. State Street, 3rd Floor
PO Box 83720
Boise, Idaho 83720-0043
Telephone No. (208) 334-4219
Facsimile No. (208) 334-4298
michael.witry@doi.idaho.gov

FILED
JUL 24 2025
Department of Insurance
State of Idaho

Attorneys for Idaho Department of Insurance

Before the Director of the Department of Insurance

State of Idaho

Idaho Department of Insurance,

Complainant,

vs.

Exouza Inc., a Virginia corporation
holding Idaho Pharmacy Benefit
Manager License No. 3003481326,

Respondent.

Docket No. 18-4713-25

**Verified Complaint and Notice
of Right to Hearing**

Comes now the staff of the Idaho Department of Insurance (“Department”), by and through its undersigned counsel, Michael Witry, Deputy Attorney General, and does hereby give notice of verified allegations constituting violation(s) of Idaho law, notice that relief will be requested from the Director of the Department, and a notice

of the right to contest the allegations and requested relief herein and right to hearing to:

**Exouza Inc.
Idaho Pharmacy Benefit Manager License No. 3003481326**

The Department alleges the following facts and violations of title 41, Idaho Code, as itemized below. The Department will present an order seeking the relief described below upon twenty-one (21) days following service of this Verified Complaint, and Exouza Inc. is further notified of its right to object to the requested relief, including the basis for any objection, and to request a hearing in writing.

Jurisdiction

1. Jurisdiction in this matter is founded in the Idaho Insurance Code, Idaho Code § 41-101 et seq., including Idaho Code § 41-210, which authorizes the Director of the Department of Insurance (“Director”) to enforce the provisions of title 41 of the Idaho Code, including those governing Respondent’s activities as a pharmacy benefit manager.

2. Jurisdiction is further founded in Idaho Code § 41-213, which authorizes the Department to institute such proceedings as deemed necessary for the enforcement of any provision of the Idaho Insurance Code including, but not limited to, license revocation and the imposition of administrative penalties.

Respondents

3. Exouza Inc. (hereinafter “Exouza”) is and was a Virginia corporation during all pertinent times as alleged herein. It carries Idaho Pharmacy Benefit Manager License No. 3003481326.

Controlling Law

4. Idaho Code § 41-349(10)(a)(i) provides that no later than January 1, 2025, and each year thereafter, each licensed pharmacy benefit manager shall report to the director of the Department the aggregate amount of the difference between the amount the pharmacy benefit manager paid each pharmacy on behalf of the health plan for prescription drugs.

5. Idaho Code § 41-349(10)(a)(ii) provides that no later than January 1, 2025, and each year thereafter, each licensed pharmacy benefit manager shall report to the director of the Department whether at any time during the reporting year the pharmacy benefit manager moved or reassigned a prescription drug to a formulary tier that has a higher cost, higher copayment, higher coinsurance, higher deductible to a consumer, or lower reimbursement to a pharmacy, and, if so, an explanation of the reason why the drug was moved or reassigned, including whether the move or reassignment was determined or requested by a prescription drug manufacturer or other entity.

6. Idaho Code § 41-349(13)(d) provides that every ninety (90) days, a pharmacy benefit manager shall report to the department the total number of appeals received and denied in the preceding ninety (90) day period, with an explanation or reason for each denial, for each specific drug for which an appeal was submitted pursuant to Idaho Code § 41-349(13).

7. Idaho Code § 41-349(9) provides that if the Director finds a pharmacy benefit manager has violated any provision of Title 41, Idaho Code, then the Director

may subject the pharmacy benefit manager to any or all of the actions, penalties, and remedies referenced in Idaho Code §§ 41-117, 41-1016, and 41-1026.

8. Idaho Code § 41-117 provides that each violation of Title 41 for which a greater penalty is not provided by another provision of law shall addition to any applicable prescribed denial, suspension, or revocation of certificate of authority or license be punishable by an administrative penalty of not more than one thousand dollars (\$1,000) for any individual or natural person and not more than five thousand dollars (\$5,000) for any other person. It further provides that each instance of violation may be considered a separate offense.

9. Idaho Code § 41-1016(1) provides that the Director may suspend, revoke or refuse to issue or renew a producer's license and may impose an administrative penalty up to one thousand dollars (\$1,000) if he finds that the person has violated Title 41.

10. Idaho Code § 41-247 provides that the Director shall have power to direct an inquiry in writing to any person subject to his jurisdiction with respect to any insurance transaction or matter relative to a subject of insurance resident, located, or to be performed in this state. The person to whom such an inquiry is addressed shall upon receipt thereof promptly furnish to the director all requested information which is in his possession or subject to his control.

Count I

1. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

2. The report Exouza was required to file with the Department for the calendar year 2024 pursuant to Idaho Code § 41-349(10)(a)(i) and (10)(b) (the “Annual Compliance Report”) was due on April 1, 2025.

3. Exouza did not file its Annual Compliance Report with the Department by April 1, 2025.

4. As of this date, Exouza has not filed the Annual Compliance Report for the calendar year 2024.

5. By failing to submit its Annual Compliance Report for the calendar year 2024, Exouza has subjected itself to discipline pursuant to Idaho Code § 41-349(9).

Count II

6. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

7. The report Exouza was required to file with the Department for the calendar year 2024 pursuant to Idaho Code § 41-349(10)(a)(ii) (the “Formulary Changes Report”) was due on April 1, 2025.

8. Exouza did not file its Formulary Changes Report with the Department by April 1, 2025.

9. As of this date, Exouza has not filed the Formulary Changes Report for the calendar year 2024.

10. By failing to submit its Formulary Changes Report for the calendar year 2024, Exouza has subjected itself to discipline pursuant to Idaho Code § 41-349(9).

Count III

11. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

12. The report Exouza was required to file with the Department for the months of October through December of 2024 pursuant to Idaho Code § 41-349(13)(d) (the “MAC Appeals Report”) was due on April 1, 2025.

13. Exouza did not file its MAC Appeals Report for this period with the Department by April 1, 2025.

14. As of this date, Exouza has not filed the MAC Appeals Report for this period.

15. By failing to submit its MAC Appeals Report for this period, Exouza has subjected itself to discipline pursuant to Idaho Code § 41-349(9).

Count IV

16. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

17. The report Exouza was required to file with the Department for the months of January through March of 2025 pursuant to Idaho Code § 41-349(13)(d) (the “MAC Appeals Report”) was due on July 1, 2025.

18. Exouza did not file its MAC Appeals Report for this period with the Department by July 1, 2025.

19. As of this date, Exouza has not filed the MAC Appeals Report for this period.

20. By failing to submit its MAC Appeals Report for this period, Exouza has subjected itself to discipline pursuant to Idaho Code § 41-349(9).

Prayer for Relief

Based on the foregoing facts and allegations, the Department prays for relief as follows:

1. For an Order imposing an administrative penalty against Exouza in the amount of \$5,000 pursuant to Idaho Code §§ 41-349 and 41-117 for each violative act as alleged herein in such total number as shall be proven at hearing, but, in the event of a default, an amount not less than Twenty Thousand Dollars (\$20,000), which represents \$5,000 per violation of title 41, Idaho Code, as alleged herein;

2. For such other and further relief as the Director deems just and necessary under the circumstances.

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Notification of Rights

To: Exouza Inc., the above-named Respondent:

Pursuant to Idaho Code § 41-232A, you have the right to a hearing on this matter. In order to exercise this right, a written request for a hearing must be filed and served upon the Department within twenty-one (21) days after service of this Complaint. Failure to file and serve a written request for a hearing upon the Department within the 21-day time period shall be deemed a waiver of the opportunity for a hearing and to contest the allegations in the Complaint, pursuant to Idaho Code § 41-232A(2). If you fail to submit a timely written response to the allegations within 21 days of the service of this Complaint, a final order will be entered imposing the relief described above.

Any written request for a hearing shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

A copy shall also be provided to the Department's counsel in this matter at the following address:

Michael Witry
Deputy Attorney General
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

In lieu of a hearing, this matter may be resolved by negotiation, stipulation, agreed settlement, or consent order, pursuant to Idaho Code § 67-5241(1)(c). Should

you wish to discuss these options, please contact the undersigned deputy attorney general.

Dated this 24th day of July 2025.

State of Idaho
Office of the Attorney General



Michael Witry
Deputy Attorney General
Attorneys for Idaho Department of Insurance

Verification

State of Idaho)
 : ss.
County of Ada)

Shannon Hohl, Market Oversight Bureau Chief of the Department of Insurance, State of Idaho, being first duly sworn, deposes and says:

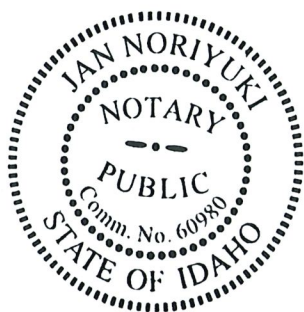
I have read the foregoing Verified Complaint and Notice of Right to Hearing and know the contents thereof and the same are true to the best of my knowledge and belief.


Dated this 24th day of July 2025.



Shannon Hohl
Market Oversight Bureau Chief
Idaho Department of Insurance

Subscribed and sworn to before me the undersigned Notary Public of Idaho this 24th day of July 2025.





Notary Public for Idaho
My Commission Expires 01-28-2031

Certificate of Service

I hereby certify that on this 24th day of July 2025, I caused a true and correct copy of the foregoing Verified Complaint and Notice of Right to Hearing to be served upon the following by the designated means:

Exouza Inc. Susheel Jain, CEO 1660 International Dr, Ste 600 McLean, VA 22102	<input checked="" type="checkbox"/> first class mail <input type="checkbox"/> certified mail <input type="checkbox"/> hand delivery <input type="checkbox"/> via facsimile <input checked="" type="checkbox"/> via email to: susheel.jain@exouza.com
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Jan Noriyuki
Paralegal