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FILED

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**Department of Insurance
State of Idaho**

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

In the Matter of:

UNITED GROUP PROGRAMS, INC., a
Florida corporation holding Idaho
Non-Resident Third Party Administrator
License No. 149968

Docket No. 18-4778-25

**SUMMARY ORDER REVOKING
IDAHO THIRD PARTY
ADMINISTRATOR LICENSE**

The Director of the Idaho Department of Insurance (Director), having been apprised of the unsound financial condition of third party administrator UNITED GROUP PROGRAMS, INC. (“UGP”), as further described below, and pursuant to the authority granted by Idaho Code § 41-915, does hereby make the following findings and enter a Summary Order as follows:

FINDINGS OF FACT

1. UGP has been continuously licensed as an Idaho third party administrator, holding license number 149968 from the date of the initial issuance on December 6, 2022, to the present date.

2. Despite numerous attempts, UGP never sent the Department its 2024 annual report, which was due July 1st, 2025. UGP had asked for, and was granted, an extension to submit its report by July 31st, 2025. Since that time, UGP has not contacted the Department.

3. On August 25, 2025, the Department received the *Amended Notice of Chapter 7 Bankruptcy Case* from the United States Bankruptcy Court in the District of Delaware, naming UGP as the Debtor.

4. On September 11, 2025, the Department wrote UGP reminding it of its continuing failure to submit its 2024 annual report and notifying it of receipt of the bankruptcy notice. Department staff offered UGP the opportunity to voluntarily surrender its third-party administrator license. The Department received no response.

CONCLUSIONS OF LAW

5. Idaho Code § 41-915(1)(a) provides that the license of an administrator shall be denied, suspended, or revoked if the Director finds that the administrator is in an unsound financial condition.

6. Idaho Code § 41-915(3)(a) and (c) provides that the Director may, in his discretion and without advance notice or hearing, immediately revoke the license of an administrator if the director finds that the administrator is insolvent or impaired or the financial condition of the administrator poses an imminent threat to the public health, safety or welfare of the residents of Idaho.

7. Exercising his discretion under Idaho Code § 41-915(3), the Director finds that UGP's bankruptcy constitutes "unsound financial condition" under Idaho Code § 41-915(3)(a). Furthermore, its unsound financial condition poses an imminent threat to the public health, safety or welfare of Idaho residents under Idaho Code § 41-915(3)(c).

8. Idaho Code § 41-915(3) does not entitle UGP to a hearing or advance notice of suspension of its license.

9. Based on the foregoing, the Director finds that the circumstances set forth above justify the revocation of UGP's Idaho third party administrator license, pursuant to Idaho Code § 41-915(1) and 41-915(3)(a) and (c).

ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED that Idaho Third Party Administrator License No. 149968 issued to UGP is hereby REVOKED, effective immediately.

IT IS FURTHER ORDERED that UGP shall immediately transfer each and every policy subject to UGP administration to a third-party administrator properly licensed in the State of Idaho and it is further ORDERED that no later than five (5) days of such transfer UGP shall notify the Department of the name and address of such third-party administrator.

DATED this 14th day of November 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. Be aware that this proceeding must be disclosed on any license application and must be reported to any and all states in which you hold an insurance license.

NOTIFICATION OF RIGHTS

This is a final order of the Director. 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 petition 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
Idaho Department of Insurance
700 W. State Street, 3rd Floor
P.O. Box 83720
Boise, ID 83720-0043

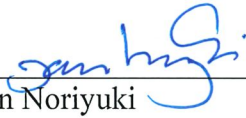
Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order or orders previously issued in this case may file a petition for judicial review in the district court of the county in which: (1) a hearing was held; or (2) the final agency action was taken; or (3) the party seeking 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; or (b) the service of an order denying the motion for reconsideration; or (c) the failure within 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 7th day of November 2025, I caused a true and correct copy of the foregoing **SUMMARY ORDER REVOKING IDAHO NONRESIDENT THIRD PARTY PRODUCER LICENSE** to be served upon the following by the designated means:

<p>United Group Programs, Inc. John Andrew Bard, DRLP 1201 Hays St. Tallahassee, FL 32301</p> <p>3145 Avalon Ridge Ste 300 Peachtree Corners, GA 30071</p>	<p><input type="checkbox"/> First-Class Mail <input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email: compliance@ugpinc.com abard@pointcomfort.com</p>
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Jan Noriyuki
Paralegal