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**BEFORE THE INSURANCE COMMISSIONER  
OF THE STATE OF UTAH**

**COMPLAINANT:**

UTAH INSURANCE DEPARTMENT

**RESPONDENTS:**

CONSOLIDATED WORKERS  
ASSOCIATION, INC.

Unlicensed

The Nemorus Building, Suite 1410  
1007 Orange Street  
Wilmington, DE 19801

c/o National Registered Agents, Inc.  
160 Greentree Drive, Suite 101  
Dover, DE 19904

c/o National Registered Agents, Inc.  
1090 Vermont Ave., N.W., #910  
Washington, DC 20005

WALTER R. CECCHINI, JR.

Unlicensed

The Nemorus Building, Suite 1410  
1007 Orange Street  
Wilmington, DE 19801

**CEASE AND DESIST  
ORDER**

Docket No. 2008-0354C

Enf. Case No. 2134



1. Respondent Consolidated Workers of America, Inc. (“CWA”) is a corporation organized under the laws of the District of Columbia on June 7, 2007, and also organized under the laws of the State of Delaware on June 21, 2007, and doing business from the State of Delaware. Respondent CWA is not authorized to do an insurance business in the State of Utah or in any other jurisdiction in the United States of America.

2. Respondent Walter R. Cecchini, Jr. is a resident of the State of Florida and is the owner, president and sole director of Respondent CWA, and is not licensed to sell insurance in the State of Utah.

3. Respondent Claims & Benefit Management, Inc. (“CBM”) is a California corporation and licensed as a third-party administrator in that state, but is not licensed to do business in the State of Utah.

4. Respondent Brad Wessler is a resident of the State of California and is president of Respondent CBM. Respondent Wessler is not licensed in any capacity by the Utah Insurance Department.

5. Respondents CWA and Cecchini market memberships in CWA through a web site and other means to individuals located throughout the United States of America, including to residents of the State of Utah.

6. Membership in Respondent CWA includes a medical benefit plan that it claims is not insurance. The medical plans provide limited specified dollar benefits to members for hospitalization, surgical procedures and doctor visits.

7. The “membership fees” charged by Respondent CWA to its members varies depending on whether the membership covers an individual, a married couple or a family, and varies by level of benefits provided.

8. Respondents CWA and Cecchini have sold CWA memberships to and collected fees from at least 46 members who are residents of the State of Utah.

9. Respondents CBM and Wessler provide third-party services to CWA by providing billing and eligibility, customer service, procession fulfillment kits/ID cards, and by processing payment of claims for members of CWA.

Having entered his Findings of Fact, the commissioner now enters the following:

**CONCLUSIONS OF LAW**

1. In providing limited specified dollar benefits to its members for hospitalization, surgical procedures and doctor visits, Respondents CWA and Cecchini are providing insurance as defined in Utah Code Annotated § 31A-1-301(82)(a) and 31A-1-301(74)(a), and constitutes a limited benefit plan under Utah Code Annotated § 31A-1-301(72)(iii)(B).

2. Membership fees collected by Respondent CWA constitute insurance premiums pursuant to Utah Code Annotated § 31A-1-301(130).

3. In providing insurance to Utah residents without having a Utah certificate of authority to conduct an insurance business, Respondents CWA and Cecchini are providing unauthorized insurance in violation of Utah Code Annotated §§ 31A-1-104(1) and 31A-4-102(1),

4. In assisting in the marketing, placement and servicing of unauthorized insurance, Respondents Cecchini, CBM and Wessler are in violation of Utah Code Annotated § 31A-15-102.

5. Respondents' actions in marketing, placing and servicing of unauthorized insurance with residents of the State of Utah constitute an immediate and significant danger to the public welfare and such threat requires immediate action by the Insurance Commissioner, justifying the issuance of an order requiring Respondents to immediately Cease and Desist any insurance business in the State of Utah under Utah Code Annotated § 63-46b-20.

Having entered his Findings of Fact and Conclusions of Law, the commissioner now enters the following:

**ORDER**

1. Respondents and all their employees, officers, directors, agents, or by or through any person acting on their behalf shall immediately Cease and Desist doing any insurance business in the State of Utah, including soliciting, marketing, or proposing to make any insurance contract, taking receiving or forwarding any application for insurance, collecting or receiving, in full or in part, any insurance premium or fees, issuing or delivering any insurance policy or other evidence of an insurance contract, publishing or disseminating any advertisement or information for insurance, or representing or assisting any person to do an unauthorized insurance business or to procure insurance from an unauthorized insurer.

2. Respondents shall promptly pay any claims for benefits made by residents of the State of Utah that may reasonably be payable under the terms of the health plans sold by Respondents to said Utah residents incurred prior to the date of this Order.

**NOTIFICATION**

Respondents are hereby notified that failure to abide by the terms of this Order may subject them to further penalties, including additional forfeitures of up to \$5,000.00 per violation, and the filing of an action to enforce this Order in the District Court which may impose penalties of up to \$10,000.00 per day for continued violation.

You are further notified that pursuant to Utah Code Annotated §§ 31A-2-308(10) and 31A-15-102(5), any person who knowingly provides or assists in placing unauthorized insurance in the State of Utah is guilty of a felony.

Respondents are further notified that, pursuant to Utah Code Annotated § 31A-15-105, they are each liable to any insured under contracts issued by an unauthorized insurer for the full amount of a claim or loss payable under the contract.

DATED this 1<sup>st</sup> day of May, 2008.

D. KENT MICHIE  
INSURANCE COMMISSIONER

  
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MARK E. KLEINFELD, JD

Administrative Law Judge  
Utah Insurance Department  
State Office Building, Room 3110  
Salt Lake City, UT 84114  
Telephone (801)538-3800

CERTIFICATE OF MAILING

I do hereby certify that on this date I mailed, by regular mail, postage prepaid, a true and correct copy of the attached:

**CEASE AND DESIST ORDER**

To the following:

**Consolidated Workers Association**  
The Nemorus Building, Suite 1410  
1007 Orange Street  
Wilmington, DE 19801

**Walter R Cecchini Jr**  
The Nemorus Building, Suite 1410  
1007 Orange Street  
Wilmington, DE 19801

The Nemorus Building, Suite 1410  
1007 Orange Street  
Wilmington, DE 19801

2100 Greenview Shores Blvd  
Wellington, FL 33414

C/o National Registered Agents Inc  
160 Greentree Drive Suite 101  
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5801 Fountains Dr. S  
Lake Worth, FL 33467-5782

C/o National Registered Agents Inc  
1090 Vermont Ave, N.W. #910  
Washington, DC 20005

14300 Aguila  
Fort Pierce, FL 34951


**Claims & Benefit Management Inc**  
6251 Schaefer Ave Suite M  
Chino Hills, CA 91710

1254 Sweet Violet Court  
Palm Beach, FL 33415

1551 North Flagler Dr #116  
West Palm Beach, FL 33401

**Brad Wessler**  
6251 Schaefer Ave Suite M  
Chino Hills, CA 91710

DATED this 2<sup>nd</sup> day of May, 2008.

  
Angie Thomas Court Clerk  
Utah Department of Insurance  
State Office Building, Room 3110  
Salt Lake City, UT 84114-6901