**BEFORE THE COMMISSIONER OF SECURITIES AND INSURANCE,
OFFICE OF THE MONTANA STATE AUDITOR**

IN THE MATTER OF the Proposed Agency Action Against STRATEGIC LIMITED PARTNERS, LP, and RFA GROUP, INC.	Case No. INS-2026-00005 **FINAL AGENCY ACTION & DEFAULT ORDER**

On April 6, 2026, the Commissioner of Securities and Insurance, Office of the Montana State Auditor (Commissioner or CSI), served a Temporary Cease and Desist Order ("Order") on Respondent, RFA Group, Inc. ("RFA Group"). A copy of the Order is attached hereto as Exhibit A.

The Order was served by US Mail with tracking capability and was delivered on April 6, 2026. RFA Group refused the delivery on the same date. A copy of the tracking receipt and history are attached hereto collectively as Exhibit B.

The Order provided RFA Group with an opportunity for an administrative hearing if requested within 15 days. The deadline for RFA Group to request an administrative hearing to challenge the Order was April 21, 2026. The Order also warned that failure to respond and request a hearing by the deadline would result in a Permanent Cease and Desist Order.

Greater than 15 days have elapsed since service of the Order and no request for hearing has been received. Therefore, a default order may issue. Admin. R. Mont. 1.3.214. The Commissioner considered the evidence and exhibits and makes the following determinations as to RFA Group:

FINDINGS OF FACT

1. RFA Group is and at all relevant times was Respondent Strategic Limited Partners, LLC's ("Strategic"), self-described "Plan Sponsor" and is a foreign corporation headquartered and domiciled in Texas, with an address of 1452 Hughes Road, Suite 200, Grapevine, TX 76051. RFA Group was voluntarily dissolved by the State of Texas.

2. RFA Group is not licensed as an insurance company in Montana and holds no license, certificate or any other approvals to transact insurance in Montana.

3. The Commissioner received 12 complaints against Strategic from Montana consumers who enrolled in Strategic's health insurance plans ("Complainants") since February 2023. The Complaints address the following issues:

a. Strategic misrepresented the plans (e.g. that the plans were issued by United HealthCare and provided coverage for particular health events);

b. Strategic misrepresented that Complainants were contacting the federal government's Health Insurance Marketplace;

c. Strategic misrepresented that the insurance plan was self-funded then that it was not;

d. Strategic misrepresented that Complainants were enrolling in a plan covered by the Affordable Care Act during the "open enrollment period;"

e. Strategic misrepresented that Complainants were fully covered when in fact they had limited or no coverage;

f. Strategic never delivered written plans to Complainants;

g. Strategic delayed paying claims;

h. Strategic was nonresponsive to Complainants' attempts to resolve claims; and

i. Strategic denied or limited claims that were covered under the plan.

4. The email addresses associated with Strategic, including compliance@strategicparnterslp.com, limitedpartnerservices@strategicpartnerslp.com, and fanding@strategicpartnerslp.com, were nonresponsive to the Commissioner's queries for many months.

5. In a letter dated November 14, 2025, the Commissioner requested information from Strategic, including the following: Policy forms; claims history and notes; logs, recordings or transcripts of phone calls; correspondence; premium payment history; and authorization notes, approvals and denials.

6. In a letter dated December 29, 2025, but received by the Commissioner on January 16, 2026, Strategic denied any wrongdoing, but failed and refused to provide any of the requested information.

CONCLUSIONS OF LAW

7. Whenever it appears to the Commissioner that a person has engaged in or is about to engage in an act or practice constituting a violation of certain Code provisions, the Commissioner has jurisdiction to issue a temporary cease and desist order. Mont. Code Ann. § 33-1-318(1)(b).

8. Mont. Code Ann. § 33-2-101(1) provides, "[e]xcept as expressly otherwise provided in this code, a person acting as an insurer and an insurer transacting insurance in this state must have a subsisting certificate of authority issued by the commissioner." It appears to the Commissioner that Strategic has engaged in an act or practice constituting a violation of Mont. Code Ann. § 33-2-101(1), as it is acting as an insurer and an insurer transacting insurance in this state, but it does not have a subsisting certificate of authority issued by the Commissioner.

9. As the Manager of RFA Group, Strategic acted as the agent for RFA Group.

10. RFA Group, as the Plan Sponsor in its own right, and through its agent Strategic, violated Mont. Code Ann. § 33-2-101, as an unauthorized insurer by transacting insurance in Montana without a certificate of authority issued by the Commissioner.

11. RFA Group in its own right, and through its agent Strategic, violated Mont. Code Ann. § 33-18-201, by misrepresenting pertinent facts or insurance policy provisions relating to coverages at issue, failing to acknowledge or to act reasonably promptly upon communications with respect to claims arising under insurance policies, refusing to pay claims without conducting a reasonable investigation based on all available information, failing to affirm or deny coverage of claims within a reasonable time after proof of loss statements had been completed, neglecting to attempt in good faith to effectuate prompt, fair and equitable settlements of claims in which liability was reasonably clear, and failing to promptly provide a reasonable explanation of the basis in the insurance policy in relation

to the facts or applicable law for denial of a claim or for the offer of a compromise settlement.

12. RFA Group in its own right, and through its agent Strategic, violated Mont. Code Ann. § 33-18-202, by making, issuing, circulating or cause to be made, issued or circulated estimates, sales presentations, omissions, or statements that misrepresented the benefits, advantages, conditions or terms of insurance policies; and by making misrepresentations to Enrollees for the purpose of inducing or tending to induce their purchase of insurance policies.

13. In violation of Mont. Code Ann. § 33-1-315(5), RFA Group, through its agent Strategic, failed and refused to produce records and other evidence requested by the Commissioner.

14. After following the procedures provided by § 33-1-701, MCA, and upon a finding by the Commissioner that violations of the Montana Insurance Code have occurred, the Commissioner may impose a fine or up to $25,000 upon a person for each violation of the above-referenced four statutes. Mont. Code Ann. § 33-1-317.

15. After following the procedures provided by Mont. Code Ann. § 33-1-701, and upon a finding by the Commissioner that a company has violated a provision of the Insurance Code or regulation promulgated by the Commissioner, the Commissioner may levy a civil penalty in accordance with Mont. Code Ann. § 33-1-317. Further, the Commissioner retains the authority to enforce the Insurance Code and impose any penalty or remedy authorized thereunder.

FINAL ORDER

THEREFORE, based on the foregoing findings of fact and conclusions of law, it is hereby ORDERED that:

1. Respondent shall pay a fine of $50,000.00 to the State of Montana within 30 days of the date of this Order. Payment must be made by check or money order payable to the State of Montana.

2. Payment shall be sent to the Commissioner of Securities and Insurance, Office of the Montana State Auditor, Attn: Brandy Morrison, Paralegal, 840 Helena Avenue, Helena, MT 59601.

DATED this 4th day of June, 2026.

JAMES BROWN
Commissioner of Securities and Insurance,
Montana State Auditor

NOTICE

You are entitled to judicial review of this Order in accordance with § 2-4-702, MCA. Judicial review may be obtained by filing a petition in district court within thirty days after the service of this Order.

CERTIFICATE OF SERVICE

I hereby certify that on June 4th, 2026, I caused a copy of the foregoing, *Final Agency Action and Default Order*, to be served on the following persons by the following means:

Strategic Limited Partners, LP
1452 Hughes Rd., Suite 200
Grapevine, TX 76051-76063
compliance@strategicpartnerslp.com; limitedpartnerservices@strategicpartnerslp.com

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RFA Group, Inc.
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Tiffany Hoffman
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