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), issued a Temporary Cease and Desist Order ("Order") concerning Strategic Limited Partners, LP, ("Strategic") and RFA Group, Inc. ("Respondents").

The Order warned that failure specifically to request a hearing within 15 days of receipt of the Order would result in a Permanent Cease and Desist Order. RFA Group did not respond to the Order. As a result, on June 4, 2026, the Commissioner issued a Final Agency Action and Default Order imposing a $50,000 fine against RFA Group.[1]

While Strategic responded with a letter (attached hereto and incorporated herein as Exhibit "A"), it did not request a hearing. Merely, the letter pledged cooperation. More than 15 days have elapsed from the date of the order, and no request for a hearing has been received.[2] 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 Strategic:

FINDINGS OF FACT

1. Strategic is and at all relevant times was an insurance company and is a foreign limited partnership headquartered and domiciled in Texas, with an address of 1452 Hughes Road, Suite 200, Grapevine, TX 76051.

[1] https://csimt.gov/wp-content/uploads/2026/06/2026-06-04-Final-Agency-Action-and-Default-Order-Strategic-Limited-Partners.pdf

[2] In fact, Strategic responded to CSI's settlement attempt by stating that it was in the process of dissolving the company and could not enter into any contracts.

2. Strategic 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 against Strategic:

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

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

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

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

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

f. Never delivered written plans to Complainants;

g. Delayed paying claims;

h. Was nonresponsive to Complainants' attempts to resolve claims; and

i. 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. 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.

10. 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.

11. 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.

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

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

14. The Commissioner finds that Strategic violated the Insurance Code in at least four instances. Based on the facts presented above, and in consideration of the severity of the violations, Strategic's violations of the insurance laws in other states, and Strategic's failure to accept responsibility in this case, the Commissioner imposes a $50,000 fine in this case.

FINAL ORDER

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

1. Respondent Strategic Limited Partners, LP, shall pay a fine of $50,000.00, together with interest at the statutory rate, 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: Tiffany Hoffman, Paralegal, 840 Helena Avenue, Helena, MT 59601.
3. Strategic, its managers, partners, associates, and agents must permanently cease and desist from transacting, selling, soliciting, producing or negotiating new and renewal insurance in Montana, including but not limited to issuing

documents to any resident in Montana or to any individual with a home address or mailing address in Montana, that purports to provide new or renewal coverage for (a) bodily injury, disablement or death, by accident or accidental means, or medical expenses or indemnity involved or (b) disablement or medical expense or indemnity resulting from sickness. See Mont. Code Ann. § 33-1-207 (definition of disability insurance).

4. Within 10 days from the date of this Order, Strategic shall provide the Commissioner with a full list of all of its customers in Montana, consisting of all Montana residents and all individuals with a home address or mailing address in Montana, using the spreadsheet provided to Strategic on June 5, 2026.

5. Should Strategic violate this Order or any other provisions of the Insurance Code, the Commissioner reserves the right to take further action.

DATED this 18th 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 19th, 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

Patrick L. Dooley, Agent for Service of Process
Strategic Limited Partners, LP
309 E. Broad Street
Mansfield, TX 76063

Irena Martinez
1452 Hughes Rd., Suite 200
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Tiffany Hoffman
Paralegal