

**STATE OF NEW HAMPSHIRE
INSURANCE DEPARTMENT**

**In re: Alieria Healthcare, Inc. (dba The Alieria Companies, Inc.)
& Trinity Healthshare Inc.
Docket No.: INS No. 19-027-EP**

**In re: Alieria Healthcare, Inc. (dba The Alieria Companies, Inc.)
Docket No.: 20-014-EP**

**In re: Trinity Healthshare Inc.
Docket No.: 20-015-EP**

MOTION TO CONSOLIDATE HEARINGS

The New Hampshire Insurance Department (NHID) by and through its counsel, moves that the hearings for Alieria Healthcare, Inc., dba The Alieria Companies, Inc., ("Alieria") and Trinity Healthshare, Inc. ("Trinity") be consolidated, and in support of that motion state as follows:

1. On October 30, 2019, the Commissioner of the NHID issued a cease a desist order directed at Alieria and Trinity, asserting that both were engaged in the unlicensed business of insurance, were administering health insurance plans without being certified as a third party administrator, were falsely holding out products as exempt from insurance regulation in New Hampshire, and were misleading New Hampshire consumers by offering, marketing, and administering health coverage that does not meet State and Federal requirements.
2. On November 27, 2019, Alieria, by and through its counsel, made an application for hearing to address the Commissioner's cease and desist order.
3. On November 29, 2019, Trinity, by and through its counsel, made an application for hearing to address the Commissioner's cease and desist order.
4. Those requests were consolidated into a single hearing currently scheduled for May 4 and May 11, 2020.
5. On March 10, 2020, NHID issued an Order to Show Cause and Notice of Hearing as to Trinity, stating in substantial part that Trinity is operating as an unlicensed insurance company as it cannot meet the requirements of a health care sharing ministry and because it misrepresents itself to consumers as a valid health care sharing ministry.

6. On March 10, 2020, NHID issued an Order to Show Cause and Notice of Hearing as to Alieria, stating in substantial part that Alieria is violation New Hampshire law because, through its business partnership with Trinity, it is marketing, soliciting, and administering Trinity products. The Order to Show Cause also states that Alieria is in violation of New Hampshire law by misleading consumers about the nature of Trinity's products.
7. Ins. 204.23 provides that
Whenever it shall appear to the department, upon motion or its own initiative, that 2 or more proceedings involve substantially similar or substantially related issues, the department shall, as fairness and efficiency permit, consolidate those proceedings for a hearing, or decision, or both, after providing parties notice and an opportunity for hearing on the proposed consolidation.
8. The matters regarding Alieria and Trinity both in the cease and desist order and the orders to show cause are substantially similar and involve substantially related issues. The two entities are business partners engaged in the same enterprise, with Alieria marketing, soliciting, and administering Trinity products in New Hampshire. The NHID's factual allegations and legal allegations/violations are substantially similar in both its cease and desist order and the orders to show cause.
9. Fairness and efficiency are best served by consolidating the hearings arising out of the Orders to Show Cause and the hearings arising out of the cease and desist order given the shared facts, shared law, and shared interests of the parties involved.

WHEREFORE, the NHID requests that the hearings officer:

- A. Grant this Motion; and
- B. Consolidate the 3 hearings for Alieria and Trinity, with all to take place on May 4, 2020 and May 11, 2020; and
- C. For other relief as is just and proper.

NEW HAMPSHIRE INSURANCE DEPARTMENT

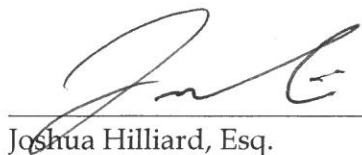
Date: 3/10/20



Joshua Hilliard, Esq.
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Compliance and Enforcement Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion to Consolidate was sent this date electronically and by first-class mail, to Elizabeth M. Lacombe Esq., counsel for Alieria, to Alieria at 5901 Peachtree Dunwoody Rd, Suite C-160, Atlanta, GA 30328, and to Jacqueline T. Menk Esq., counsel Trinity, and to Trinity at 5901-B Peachtree Dunwoody Rd., Suite 160C, Atlanta, GA 30328.

A handwritten signature in black ink, appearing to read 'J Hilliard', is written over a horizontal line.

Joshua Hilliard, Esq.