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STATE OF OHIO
DEPARTMENT OF INSURANCE
50 West Town Street
Third Floor, Suite 300
Columbus, Ohio 43215

In the Matter of:	:	
	:	
BLUE CROSS BLUE SHIELD	:	JUDITH L. FRENCH
OF MICHIGAN	:	Superintendent/Director
	:	

CONSENT ORDER

The Ohio Department of Insurance ("Department"), by and through the Superintendent, is charged with the responsibility of administering and enforcing Title 39 of the Ohio Revised Code ("R.C.") and the rules and regulations adopted thereunder.

Blue Cross Blue Shield of Michigan ("Respondent") is a Michigan nonprofit mutual insurance company authorized to engage in health insurance business in the State of Michigan. Respondent's business address of record is 600 Lafayette East, Detroit, MI 48226.

In 2024, the Department conducted an inquiry ("Inquiry") of coverage for certain Ohio residents under a group sickness and accident policy issued to the First Responder Retirees of the Steel Retiree Voluntary Employees' Beneficiary Association in Michigan ("Policy").

In lieu of further administrative proceedings and to fully and finally resolve all matters in the Inquiry, the Department and Respondent agree to the following:

1. Respondent consents to the jurisdiction of the Superintendent and the Department to enter into this Consent Order, and Respondent expressly waives any prerequisites to jurisdiction that may exist.

2. Respondent agrees to forego any administrative remedies and waives any and all rights to further notice and hearing or to appeal this Consent Order, rights to which Respondent may have otherwise been entitled to pursuant to R.C. Chapter 119 and/or other applicable laws and regulations.

3. Respondent acknowledges that coverage under the Policy will not be available to any Ohio residents after December 31, 2025.

4. Respondent understands that the execution of this Consent Order does not preclude the Department from conducting an examination to confirm Respondent's compliance with this Consent Order.

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5. Respondent waives any and all causes of action, claims or rights, known and unknown, which they may have against the Department and any of its employees, attorneys, agents, consultants, contractors, officials, or representatives, in their individual and official capacities, as a result of any act or omission on the part of such persons.

6. Respondent understands and agrees that this Consent Order shall be considered a public record as the term is used in R.C. Section 149.43.

7. This Consent Order represents a compromise between the parties for the full, complete, and final resolution of any issues that may have arisen during the Inquiry.

8. Nothing contained in the Consent Order shall be construed as an admission of liability or wrongdoing of any kind by Respondent.

9. The Department has agreed to the terms of this Consent Order based upon representations made to the Department by Respondent. To the extent that representations made by Respondent are later found to be materially incomplete or inaccurate, this Consent Order or certain provisions thereof are voidable by the Department in its sole discretion.

10. This Consent Order shall be effective on the date it is signed by, or on behalf of, the Superintendent of the Department.

11. All notices, reports, requests, and other communications to the Department regarding this Consent Order shall be in writing and shall be directed as follows:

    If to the Department:

    Ohio Department of Insurance
    Attention: Legal Division

    If to the Respondent:

    Blue Cross Blue Shield of Michigan
    600 Lafayette East, Mail Code 1924
    Detroit, MI 48226
    Attention: Kevin M. Stanko

12. This Consent Order and any dispute hereunder shall be governed by the laws of the State of Ohio without regard to any conflict of laws principles.

13. This Consent Order may not be amended except by an instrument in writing signed on behalf of all parties to this Consent Order.

14. This Consent Order constitutes the entire agreement between the Department and Respondent relating to the matters identified in the Inquiry and supersedes any prior

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communication, understanding or agreement, whether written or oral, concerning the subject matter of this Consent Order. No inducement, promise, understanding, condition or warranty not set forth in this Consent Order has been relied upon by any party to this Consent Order.

15. In the event that one or more provisions contained in this Consent Order shall for any reason be held invalid, illegal, or unenforceable in any respect, such invalidity, illegality, or unenforceability shall not affect any other provision of this Consent Order.

DATED: 12/11/2025 **BY:** Signed by: Michelle Pace AA6614BA22434B9...

MICHELLE PACE
Vice President/Underwriting
Blue Cross Blue Shield of Michigan

DATED: 12/16/2025 **BY:** Judith L. French

JUDITH L. FRENCH
Director/Superintendent
Ohio Department of Insurance