

**GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS
OFFICE OF THE LIEUTENANT GOVERNOR
DIVISION OF BANKING AND INSURANCE**

IN THE MATTER OF:)
ROBERT S. TILLOTSON) ORDER NO. 2/2015
AND HEALTHCARE INTERNATIONAL)
_____)

ORDER

WHEREAS, this matter initially came before the Honorable Vargrave A. Richards in 2004, the then Lieutenant Governor and Commissioner of Insurance ("Commissioner") for the U.S. Virgin Islands, on a complaint from a member of the general public that Tilloglobe and its principal, Robert S. Tillotson ("Mr. Tillotson"), have been actively soliciting health insurance business from residents of the United States Virgin Islands ("Territory"); and

WHEREAS, it was found during the Office of Lieutenant Governor, Division of Banking and Insurance ("Division") investigation that Tilloglobe and Mr. Tillotson were not authorized to transact insurance business in the Territory; and

WHEREAS, the Division's records reflected Tilloglobe did not hold any insurance license in the Virgin Islands, and Mr. Tillotson's nonresident agent license was effective April 29, 2003 and expired on December 31, 2003; and

WHEREAS, Mr. Tillotson, as a nonresident agent at the time, was not authorized to solicit or place insurance directly procured by an insured in the Territory upon risks or property in the Territory pursuant to Title 22 V.I.C Section 772(d); and

WHEREAS, as a result of the Commissioner's findings, an Order to Cease and Desist No. 3/2004, dated March 18, 2004 was issued by the then Commissioner, requiring Tilliglobe and Robert Tillotson to Cease and Desist "any solicitation (including advertisements via the print and broadcast media), acceptance or transaction of insurance business covering risks in the U.S. Virgin Islands"; and

WHEREAS, the Order further provided if there was noncompliance of the Cease and Desist Order, the Division could seek injunctive relief and refer the matter to the U.S. Virgin Islands Office of the Attorney General; and

WHEREAS, despite the issuance of the Cease and Desist Order in 2004, the Division received information from a complainant that a health insurance policy was issued by Sirius International Insurance Corporation in October 2006 through Mr. Tillotson as the agent; and

WHEREAS, on October 27, 2015, the Division again received information that Mr. Tillotson is soliciting business in the Territory through Healthcare International, a London based health insurance company; and

WHEREAS, neither Mr. Tillotson nor Healthcare International is licensed to solicit or sell health insurance in the Territory; and

WHEREAS, it should be noted the type of health insurance plan Mr. Tillotson is selling is an expatriate plan that is not in compliance with the Affordable Care Act (ACA) requirements and should not be sold to Virgin Islands' residents unless they are currently living and working in jurisdictions outside the United States and U.S. territories; and

WHEREAS, Mr. Tillotson continues to solicit health insurance business to residents of this Territory through different health insurance companies despite not having an insurance license in the Territory; and

WHEREAS, Mr. Tillotson is in violation of 22 V.I.C. Section 752, which provides, "no corporation, firm or individual shall do or perform any act as agent, broker, solicitor or adjuster unless then licensed in the Virgin Islands"; and

WHEREAS, Section 752(b) further provides, "any person violating this section shall be liable to a fine of not to exceed \$500.00 and imprisonment for not to exceed six months for each instance of such violation"; and

WHEREAS, Healthcare International is in violation of 22 V.I.C. Section 202, which provides that "no insurer shall transact insurance in this Territory other than as authorized by a certificate of authority issued to it by the Commissioner ..."; and

WHEREAS, 22 V.I.C. Section 7 provides "violation of any provision of this title or any order, rule or regulation issued by the Commissioner pursuant to this title is punishable by a fine of not less than \$10 nor more than \$1,000, or by imprisonment for not more than one year, or both fine and imprisonment, in addition to any other penalty or forfeiture provided by law."

NOW THEREFORE, the premises having been fully considered and in accordance with the authority of the Commissioner under Title 22 V.I.C. Section 53(2), 202 and 752, the Commissioner finds that Mr. Tillotson and Healthcare International, solicited and transacted business in the Territory without a license. It is hereby

ORDERED, that Mr. Tillotson shall immediately Cease and Desist transacting insurance business in the Territory until the penalty imposed herein has been paid and a written determination is made by the Commissioner providing otherwise; and

FURTHER ORDERED, that Healthcare International shall immediately Cease and Desist issuing insurance policies in the Territory until the penalty imposed herein has been paid and a written determination is made by the Commissioner providing otherwise; and

FURTHER ORDERED, that Mr. Tillotson shall be fined the sum of Five Hundred Dollars (\$500.00), the maximum per each violation, as a penalty for soliciting insurance business in the Territory without having the appropriate license; and

FURTHER ORDERED, that Mr. Tillotson shall remit to the Division the fine of \$500 for his violation within 15 days from receipt of this Order; and

FURTHER ORDERED, that Healthcare International shall be fined the sum of One Thousand Dollars (\$1000.00), the maximum for violation, as penalty for issuing insurance policies in the Territory without having a license; and

FURTHER ORDERED, that Healthcare International shall remit to the Division the fine of \$1,000 for its violation within 15 days from receipt of this Order; and

FURTHER ORDERED, that this Order shall remain in force against Mr. Tillotson, prohibiting insurance business activity as an insurance producer or in any capacity on behalf of any insurer, any company or entity until a written determination is made by the Commissioner providing otherwise, and

FURTHER ORDERED, given Mr. Tillotson's non-compliance with the March 2004 Cease and Desist Order No. 2/2004 and his continued failure to comply with the insurance laws of the Virgin Islands, this matter will be referred to the U.S. Virgin Islands Office of the Attorney General for legal enforcement; and

FURTHER ORDERED, that Mr. Tillotson shall submit to the Division by November 17, 2015, the names and addresses of all policyholders whom he has placed insurance coverage for in the Territory since March 18, 2004, the types of coverage placed, the premium received, and the name(s) of the company that coverage was placed with; and

FURTHER ORDERED, that Mr. Tillotson and Healthcare International may request a hearing before the Commissioner within 10 days of receipt of this Order (November 14, 2015) to show cause why this Order should not remain in effect; and

FURTHER ORDERED, that a copy of this Order shall be delivered certified mail return receipt to Mr. Tillotson at 2102 Rountree Drive Austin Texas 78722 and Healthcare International c/o HealthCare International Global Network Ltd. at UK Administration Office 95 Cromwell Road London SW7 4DL United Kingdom and published in a local newspaper of general circulation.

Dated: November 4, 2015



Osbert E. Potter
Lieutenant Governor/
Commissioner of Insurance

