

No. **2026-9881**

**Official Order
of the
Texas Commissioner of Insurance**

Date: 04/08/2026

Subject Considered:

Strategic Limited Partners LP 1452
Hughes Road Suite 200 Grapevine,
Texas 76051

Default Order
TDI Enforcement File No. 33489

General remarks and official action taken:

This is a default order taken against Strategic Limited Partners LP (Respondent) because it engaged in acts constituting the business of insurance and repeatedly failed to provide information requested by the department. Respondent did not respond to a Notice of Allegations mailed by the Texas Department of Insurance. This order requires Respondent to cease and desist from the unauthorized business of insurance. Additionally, this order requires Respondent to pay restitution to consumers.

The following findings of fact and conclusions of law are adopted:

Findings of Fact

Failure to Respond to Notice of Allegations

1. On January 21, 2026, the department sent a Notice of Allegations, attached as Exhibit A, to Respondent.
2. The department sent the Notice of Allegations to Respondent's last known address provided in writing to the department, 1452 Hughes Road Suite 200, Grapevine, Texas 76051.

2026-9881

Commissioner's Order
Strategic Limited Partners LP
Page 2 of 4

3. Respondent received and waived an opportunity for a hearing because Respondent failed to send the department a written response to the Notice of Allegations within 20 days after the date the Notice of Allegations was mailed.
4. The department's factual allegations set out in the attached Notice of Allegations are incorporated in this order as findings of fact.

Conclusions of Law

1. The commissioner has jurisdiction under Texas law, including TEX. INS. CODE §§ 82.051-82.055, 84.021-84.044, 101.102, 101.104, 4001.002, 4005.102, Chap. 841, and Chap. 1301; and TEX. GOV'T CODE §§ 2001.003(1) and 2001.051-2001.178.
2. The commissioner has authority to dispose of this case informally under TEX. GOV'T CODE § 2001.056; TEX. INS. CODE § 82.055; and 28 TEX. ADMIN. CODE § 1.47.
3. The department provided proper notice to Respondent under TEX. GOV'T CODE §§ 2001.003(1), 2001.051, 2001.052, 2001.054, and 2001.056(4), and 28 TEX. ADMIN. CODE §§ 1.28, 1.47, and 19.906.
4. Based on Respondent's failure to send the department a written response to the Notice of Allegations, the department is entitled to disposition by default under 28 TEX. ADMIN. CODE § 1.47.
5. Respondent failed to show compliance with the law.
6. The department's factual and legal allegations set out in the attached Notice of Allegations are incorporated in this order and deemed admitted as true under 28 TEX. ADMIN. CODE § 1.47.

Order

It is ordered that Strategic Limited Partners LP immediately cease and desist from engaging in the unauthorized business of insurance.


It is further ordered that Strategic Limited Partners LP pay restitution of all premiums paid and all unpaid claims incurred by any Texas consumers who purchased its products from October 13, 2021, through the date of this order. Strategic Limited Partners LP must pay all restitution within 60 days from the date of this order. Within 90 days from the date of

2026-9881

Commissioner's Order
Strategic Limited Partners LP
Page 3 of 4

this order, Strategic Limited Partners LP must send a spreadsheet detailing all restitution payments to EnforcementReports@tdi.texas.gov.

A copy of this order will be provided to law enforcement or other appropriate administrative agencies for further investigation as may be warranted.

Signed by:

FE10434BC41A470...
Amanda Crawford
Commissioner of Insurance

Prepared and reviewed by:



Stephanie Andrews, Staff Attorney
Enforcement

Affidavit

STATE OF TEXAS §
 §
COUNTY OF TRAVIS §


Before me, the undersigned authority, personally appeared Jackie Gonzales, who, being by me duly sworn, deposed as follows:

"My name is Jackie Gonzales and I am employed by the Texas Department of Insurance. I am of sound mind, capable of making this affidavit, and have personal knowledge of these facts which are true and correct.

I have reviewed TDI's records concerning Strategic Limited Partners LP. I have confirmed that:

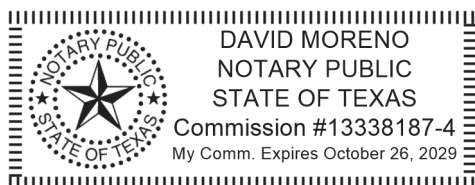
- a. The last mailing address known to the department for Strategic Limited Partners LP is 1452 Hughes Road Suite 200, Grapevine, Texas 76051.
- b. The file maintained by Enforcement contains a Notice of Allegations dated January 21, 2026, which was sent to 1452 Hughes Road Suite 200, Grapevine, Texas 76051.
- c. On January 21, 2026, the Notice of Allegations addressed to Strategic Limited Partners LP was mailed certified, return receipt requested, to its last known address.

Copies of the certified mail log maintained by Enforcement is attached as Exhibit B."

Signed by:

8350006F040C4C3...
Affiant

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 2/20/2026. This notarial act was an online notarization.

Notary Seal



Digital Certificate

Signed by:

455E4109E15D4CD...
Notary Public State of Texas

2026-9881



PO Box 12030 | Austin, TX 78711 | 800-578-4677 | tdi.texas.gov

January 21, 2026

Strategic Limited Partners LP
1452 Hughes Road Suite 200
Grapevine, Texas 76051

Via CM/RRR No. 9214 8901 9403 8353 0174 74

Strategic Limited Partners LP
c/o Lee Seidlits

Via Email:



**TDI ENFORCEMENT CASE NO. 33489
NOTICE OF ALLEGATIONS AGAINST STRATEGIC LIMITED PARTNERS LP**

The Texas Department of Insurance (TDI) seeks to take disciplinary action against Strategic Limited Partners LP (Strategic). This Notice states the allegations against Strategic and the relief sought by TDI.

YOUR WRITTEN RESPONSE IS REQUIRED WITHIN 20 DAYS

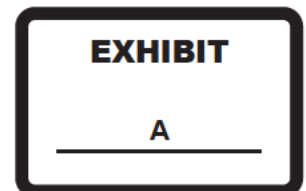
STRATEGIC HAS THE RIGHT TO A HEARING AND IS INVITED TO SHOW COMPLIANCE WITH THE LAW. To request a hearing, Strategic must send a written response to TDI within 20 days of the date this Notice was mailed.

If Strategic fails to send a written response by the deadline, *Strategic waives its right to a hearing*, and TDI may seek disposition by default under 28 TEX. ADMIN. CODE § 1.47, TEX. INS. CODE § 82.055, and TEX. GOV'T. CODE § 2001.056.

If Strategic fails to send a written response by the deadline, without further notice to you, the commissioner of insurance may issue a default order that admits the factual matters asserted, deems all allegations as true, and orders the relief recommended in this Notice.

You must send your written response by mail, fax, or email to:

Stephanie Andrews, Staff Attorney
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030



(512) 490-1020 (Fax)
stephanie.andrews@tdi.texas.gov

Jurisdiction

The commissioner of insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 101.102, 101.104, 4001.002, 4005.101, 4005.101, 4005.102, Chap. 841, and Chap. 1301, and TEX. GOV'T CODE §§ 2001.003(1) and 2001.051–2001.178.

Factual Allegations

Background and Licensing Information

1. On October 13, 2021, a Certificate of Formation was filed with the Texas Secretary of State for Strategic Limited Partners, LP. The initial registered agent was listed as Patrick Dooley, and the general partner was listed as RFA Group, Inc.
2. Strategic holds no license or other authorization issued by the department.

Unauthorized Business of Insurance

3. Texas law seeks to protect Texas consumers from unauthorized insurance schemes: "It is the policy of this state to protect residents against acts by a person or insurer who is not authorized to do insurance business." TEX. INS. CODE § 101.001(b).
4. Texas law also seeks to protect consumers in other states by establishing that Texas will not be a safe harbor for persons or insurers engaged in the unauthorized business of insurance in Texas, regardless of whether the insureds or other persons affected by the unauthorized business of insurance are residents of Texas. TEX. INS. CODE § 101.001(d).
5. Persons that engage in the "business of insurance" in Texas are subject to the jurisdiction of the Texas Commissioner of Insurance and Texas courts. TEX. INS. CODE §§ 101.001(c) and 101.051.
6. Texas law provides that "[a] person who in any manner assisted directly or indirectly in the procurement, processing, administration, claims handling, adjusting, or claims payment of the contract, agreement, or arrangement is liable to the insured

for the full amount of a claim or loss under the terms of the contract, agreement, or arrangement if the unauthorized insurer or person fails to pay the claim or loss.” TEX. INS. CODE § 101.201.

Department Investigation

7. The department conducted an investigation of Strategic’s business practices based on multiple consumer complaints. Strategic routinely failed to pay claims and failed to issue refunds for unearned premiums. In some instances, once the department reached out to Strategic, the company would review the file and finally pay the outstanding claim or issue a full refund of premiums.

M.C.

8. M.C. purchased a Strategic insurance plan for \$280 and was told that there would be no other charges for a year. At some point, Strategic contacted M.C. about an overpayment of \$40 and asked for credit card information to issue a refund. Instead of a refund, M.C. was signed up for a new health plan and charged an additional \$244.95. M.C. tried to cancel his policies but was told “good luck trying to cancel.” M.C. has been unable to obtain a refund of \$1,477.60 for premiums paid.

N.M.

9. N.M. purchased a Strategic policy for his son, paying a deposit of \$416.80. N.M. then learned that Strategic had multiple complaints filed through the Better Business Bureau. The initial deposit amount has not been returned to N.M.

M.W.

10. S.M., later M.W.’s attorney-in-fact (AIF), assisted M.W. with purchasing a marketplace insurance policy. Initially Strategic represented to the AIF that it was licensed to sell insurance in Texas and that the policy could be canceled within 10 days of the purchase. A plan was selected based on Strategic’s representation that hospital stays would be covered at a cost sharing percentage of 80/20. However, the very next day, the hospital discovered that the policy would not cover any expenses for a hospital stay. The AIF then attempted to assist M.W. with canceling the policy with Strategic but was told to contact the third-party administrator. The third-party administrator would not discuss the details of the policy without a

medical power of attorney. Even after the power of attorney was provided, the AIF was unable to obtain a refund for M.W. of \$514.90 for premiums paid on the policy.

M.M.

11. M.M. initially purchased a Strategic policy but then attempted to cancel the very next day, as the policy would not meet her needs. When M.M. contacted Strategic, the company told her she would have to commit to keeping the policy for one month. When M.M. asked to speak with a supervisor, she was turned over to another Strategic agent who stated proof of insurance elsewhere would be required before the policy could be canceled. When the department requested information regarding M.M.'s policy, Strategic finally issued a full refund of \$718.90.

A.L.

12. A.L. purchased a policy to cover all expenses related to an emergency room visit. However, after A.L. received emergency treatment, she received invoices from the emergency center for \$25,487.84 and \$1,169.00. Strategic informed A.L. that the entire amount would be her responsibility. A.L. contacted Strategic and was told that the claim was not filed since the hospital filed the claim twice. However, A.L. confirmed with the hospital that the claim was not filed twice, but when no response was obtained from Strategic, the hospital sent the same invoice a second time. Strategic then told A.L. that a computer error resulted in the initial letter, confirmed that she had the anticipated coverage, and stated it would take another 24 days for the claim to be processed. However, this did not happen. A.L. sent a letter to Strategic which was returned unopened. After repeated attempts to have her claim processed, A.L. has been unable to obtain payment in accordance with her insurance policy.

M.S.

13. M.S. obtained dental insurance with Strategic. Prior to treatment, the dentist verified coverage and the fee schedule with the company. After treatment was completed and the claims timely filed, the dentist was unable to obtain payment. Strategic repeatedly postponed payment saying it was not ready. Once the department requested information regarding the claims at issue, Strategic finally issued payment in the amount of \$602.20—seven months after treatment was completed.

B.F.

14. B.F. obtained insurance coverage with a different company through the health care marketplace. However, she was suddenly charged for a Strategic policy, despite never communicating with Strategic and never agreeing to a policy. When she contacted the number associated with the charges, Strategic told B.F. it would not be able to issue a refund. After the department requested information about the policy, Strategic finally issued a full refund to B.F.

D.A.

15. D.A. purchased an insurance policy from Strategic based on her and her husband's medical needs. D.A. paid the down payment of \$20 and then paid premiums of \$263.95 a month for five months. After several doctor visits and an emergency room visit, Strategic failed to pay a single claim. Despite Strategic previously telling D.A. that the policy would cover an unlimited number of doctor visits, Strategic later informed D.A. that only two visits would be covered at \$150. D.A. contacted Strategic multiple times, was given conflicting information, and still Strategic failed to pay the claims. Once the department requested information regarding the claims, Strategic finally issued a full refund of premiums paid.

D.P.

16. D.P. purchased a benefit plan from Strategic that the company represented to him would pay \$20,000 if he was ever diagnosed with cancer. Unfortunately, D.P. was diagnosed with cancer, and after surgery and extensive testing, D.P. contacted Strategic to file a claim on the policy. After nearly two months, Strategic told D.P. a check was issued. However, D.P. never received a check from Strategic and in fact, spent approximately the next year and a half trying to obtain payment. Strategic maintained that additional documentation was required and even suggested at one point that D.P. had a preexisting condition. D.P. confirmed that each provider gave the necessary paperwork to Strategic and despite constant attempts from D.P., he was unable to obtain payment. Two days after the department requested information regarding D.P.'s claim, Strategic finally issued payment for the full amount of the policy.

Failure to Respond to the Department

17. Strategic initially asserted that it was exempt from licensure under the Employee Retirement Income Security Act (ERISA). Strategic later indicated it would be shutting down the business and no longer offering its insurance products. However, Strategic has continually failed to provide information and documentation to show it is indeed ceasing its operations.
18. Strategic has continually failed to provide the department with information and documentation regarding its members, policies, and the pending claims of its members.
19. Despite initially responding to the department, Strategic has ceased all communication.
20. Strategic's failure to respond has caused TDI to initiate this contested case to ensure the protection of the citizens of Texas and other states from Strategic's unauthorized insurance activity.

Other State Administrative Actions

Minnesota Department of Commerce

21. On September 4, 2024, the Minnesota Department of Commerce issued a Cease and Desist Order against Strategic.
 - a. The Order alleged that Strategic "attempt[ed] to skirt the insurance regulations in Minnesota by purportedly making all customers 'limited partners' in Strategic and claiming that their insurance policies are governed under the Employee Retirement Income Security Act (ERISA), and not state insurance regulations."
 - b. The Order further alleged that consumers were "not bona fide limited partners of Strategic[,] [did] not perform services on behalf of the partnership[,] and "were not aware of this partnership arrangement or any services they had to provide to Strategic."
 - c. The Order required that Strategic "cease and desist from engaging in the business of insurance or administering any insurance plans[.]"

22. On October 7, 2025, the Minnesota Department of Commerce issued a Consent Order against Strategic, ordering that it “cease and desist all operations in Minnesota as soon as practicable, and no later than December 31, 2025.”

Arizona Department of Insurance and Financial Institutions

23. On October 22, 2024, the Department of Insurance and Financial Institutions of the State of Arizona issued an Order to Cease and Desist to Strategic. The Order stated that Strategic, without obtaining a certificate of authority, “unlawfully engaged in the business of transacting insurance in the State of Arizona[.]”
- a. The Order found that Strategic “presented to consumers that they are being enrolled in a healthcare insurance plan and collected monthly insurance premium[] payments.”
 - b. Strategic was ordered to “immediately cease and desist from transacting business of insurance in the State of Arizona.” Additionally, Strategic was ordered to “immediately cease [and] desist from renewing existing insurance contracts and collecting insurance premiums from Arizona consumers.”

Wisconsin Office of the Commissioner of Insurance

24. On November 19, 2024, the Wisconsin Office of the Commissioner of Insurance issued a Stipulation and Order against Strategic, finding that Strategic “does not hold a certificate of authority to transact insurance business in Wisconsin.”
- a. The Order finds that Strategic “falsely represent[ed] to potential and current members that the [Strategic] plan constitutes comprehensive or major medical insurance.”
 - b. Additionally, the Order finds that consumers were “purportedly offered the opportunity to become ‘employees,’ ‘active limited partners,’ and /or ‘working owners’ of [Strategic] eligible for membership in the [Strategic] plan.” However, Strategic “declines to describe the ‘work’ these consumers perform or the role they play, so as to be considered employees, limited partners, and/or working owners of [Strategic].”

- c. Further, the Order finds that the application for Strategic’s plan “describes a mobile app that members may download, through and by which information about physical activity is collected and shared with third parties. However, the application contains no requirement that the consumer download or use this app as a condition of coverage, and the application does not otherwise set forth how a consumer might become an employee, active limited partner, and/or working owner of [Strategic].” “The application of insurance references ‘limited partnership agreements’ and ‘joinder agreements,’ which [Strategic] [] declined to provide[.]”
- d. Strategic was ordered to “cease and desist writing new business and renewing existing business in the state of Wisconsin or assuming business affecting Wisconsin insureds.” Additionally, “[Strategic] shall refund all premiums paid for policies purchased by Wisconsin consumers.”

New Hampshire Insurance Department

- 25. On August 6, 2025, the New Hampshire Insurance Department issued a Consent Order against Strategic.
 - a. The Order found that Strategic “is not licensed as an insurance company nor an insurance agency in NH and holds no licenses, certificates, or other approvals to engage in the business of insurance in New Hampshire.”
 - b. The Order further found that Strategic required its “enrollees in its health insurance plan to become a limited partner (‘working owner’) in its business by downloading an application on their phones used to browse the web for a minimum of 500 hours. [Strategic] then collects personal browsing information which is sold to third parties. However, some enrollees obtained health insurance coverage through [Strategic] without proof of downloading and using the application.”
 - c. Additionally, the Order found that “[t]he Enrollment Form [Strategic] provided to enrollees in its health insurance plan did not mention that an enrollee is considered a working owner or employee, nor did it provide any information on the duties said enrollee is expected to perform, nor the compensation said enrollee will earn for his or her work.”

- d. Importantly, the Order found that the enrollees “stated that they did not complete any work for [Strategic] and were unaware of any limited partnership or requirement to complete any work as a condition of acquiring or retaining [Strategic’s] health insurance.”
- e. Through the Order, Strategic agreed to “cease all operations in [New Hampshire] by December 31, 2025[.]”

Legal Allegations

- 1. Strategic violated TEX. INS. CODE § 101.102 by engaging in acts constituting the business of insurance without a license or other authorization.
- 2. Strategic violated TEX. INS. CODE § 101.104 by repeatedly failing to provide the information requested by the department.

Relief Sought

TDI seeks the following relief:

- 1. an order mandating Strategic cease and desist from certain activity or conduct, including the unauthorized business of insurance;
- 2. an administrative penalty under TEX. INS. CODE §§ 84.021 and 84.022;
- 3. restitution to any victim under TEX. INS. CODE § 82.053; and
- 4. imposition of any other just and appropriate relief to which the department may be entitled to by law, including any combination of the above actions.

Respectfully,



Stephanie Andrews
State Bar No. 24063672
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030

2026-9881

Notice of Allegations
Strategic Limited Partners, LP
Page 10 of 10

(512) 676-6346 (Direct)
(512) 490-1020 (Fax)
stephanie.andrews@tdi.texas.gov

cc: Leah Gillum, Deputy Commissioner, Fraud and Enforcement Division, MC: ENF
Ginger Loeffler, Litigation Director, Enforcement, MC: ENF

CERTIFICATE OF SERVICE

I, Stephanie Andrews, certify that a true and correct copy of this *Notice of Allegations Against Strategic Limited Partners, LP* was sent by the following methods on this 21st day of January, 2026 to:

Strategic Limited Partners LP
1452 Hughes Road Suite 200
Grapevine, TX 76051

Via CM/RRR No. 9214 8901 9403 8353 0174 74

Strategic Limited Partners LP
c/o Lee Seidlits

Via Email: [REDACTED]

[REDACTED]
Counsel for Respondent



Stephanie Andrews



**Shipment Confirmation
Acceptance Notice**

A. Mailer Action

Note to Mailer: The labels and volume associated to this form online, **must** match the labeled packages being presented to the USPS® employee with this form.

Shipment Date: 01/21/2026
 Shipped From:
 Name: ENF J GONZALES
 Address: 1601 CONGRESS AVE
 City: AUSTIN
 State: TX ZIP+4® 78701

| Type of Mail | Volume |
|------------------------------|--------|
| Priority Mail Express® | |
| Priority Mail® | |
| First-Class Package Service® | |
| Returns | |
| International* | |
| Other | 1 |
| Total | 1 |

*Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

B. USPS Action

Note to RSS Clerk:

1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm
3. Scan or enter the barcode/label number from PS Form 5630
4. Confirm the volume count message by selecting Yes or No
5. Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail.
 Leave form with customer or in customer's mail receptacle.

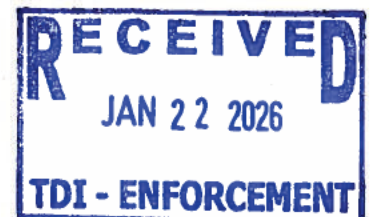
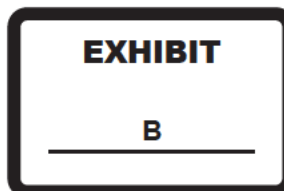
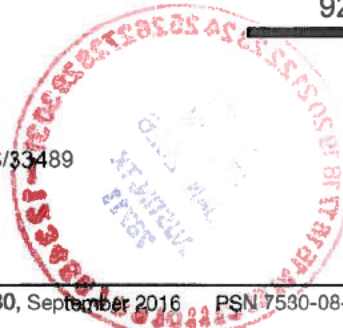


USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0067 6135 18

ANDREWS/33489





Name and Address of Sender
 ENF J. GONZALES
 1601 CONGRESS AVE
 STE 6.900
 AUSTIN TX 78701

- Check type of mail or service
- Adult Signature Required
 - Adult Signature Restricted Delivery
 - Certified Mail
 - Certified Mail Restricted Delivery
 - Collect on Delivery (COD)
 - Insured Mail
 - Priority Mail
 - Priority Mail Express
 - Registered Mail
 - Return Receipt for Merchandise
 - Signature Confirmation
 - Signature Confirmation Restricted Delivery

Affix Stamp Here
 (for additional copies of this receipt).
 Postmark with Date of Receipt.

| | | | | | | | | | | | | | | | | | |
|--|---|---------|------|---------------------|------|-----------------|--|----------------------------|---------------|-------------------|--------------------------|-------------------------------------|---------------------|----------------|------------------------|--|------------------|
| USPS Tracking/Article Number | 9214 8901 9403 8353 0174 74 | Postage | 1.90 | (Extra Service) Fee | 5.30 | Handling Charge | Handling Charge - if Registered and over \$50,000 in value | Actual Value if Registered | Insured Value | Due Sender if COD | ASR Fee | ASRD Fee | RD Fee | RR Fee | SC Fee | SCRD Fee | SH Fee |
| Address (Name, Street, City, State, & ZIP Code™) | STRATEGIC LIMITED PARTNERS LP 1452 HUGHES ROAD SUITE 200 C/O LEE SEIDLITS GRAPEVINE, TEXAS 76051 | | | | | | | | | | Adult Signature Required | Adult Signature Restricted Delivery | Restricted Delivery | Return Receipt | Signature Confirmation | Signature Confirmation Restricted Delivery | Special Handling |



2026-9881

| | | | | | |
|---|---|--|---|--|--------|
| Total Number of Pieces Listed by Sender | 1 | Total Number of Pieces Received at Post Office | 1 | Postmaster: Per (Name of receiving employee) | ykoonu |
|---|---|--|---|--|--------|