

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 19-cv-61430-SINGHAL/VALLE

ELIZABETH E. BELIN, *et al.*,

Plaintiffs,

CLASS ACTION

v.

HEALTH INSURANCE INNOVATIONS, INC.,  
*et al.*,

Defendants.

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**DECLARATION OF DOMENICK C. DICICCO, JR.**

Pursuant to 28 U.S.C. § 1746, I, Domenick C. DiCicco, Jr., declare as follows:

1. I am an individual over the age of twenty-one (21) and I submit this declaration based upon my own personal knowledge of the facts stated in this declaration, and review of public records and other documentation.

2. I am a Chief Executive Officer at Benefytt Technologies, Inc. f/k/a Health Insurance Innovations, Inc. and Health Plan Intermediaries Holdings, LLC (collectively, the “HII Defendants”).

3. I submit this Declaration in support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Settlement.

4. As part of the Settlement Agreement with Plaintiffs, the HII Defendants agree to pay \$27.5 million in Settlement consideration. The HII Defendants’ relevant liability insurance companies have contested insurance coverage for this litigation and have only paid \$100,000 for defense litigation costs previously incurred.

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5. In August 2020, the HII Defendants were sold to a private party. No reserve of funds was created or withheld relating to the outcome of this lawsuit.

6. Before Defendants could agree to make a substantial, multimillion-dollar payment of Settlement consideration, the HII Defendants sought and obtained financing from a third party.

7. The HII Defendants recently discontinued the sale of limited benefit indemnity plans through all but one distributor. For those plans that the HII Defendants may still market, the HII Defendants have agreed to make and/or maintain the business practice changes listed in the Settlement Agreement.

8. The HII Defendants have made no agreements in connection with the proposed settlement. The HII Defendants will reasonably cooperate in the notice and administration process by providing the Settlement Administrator with the available names, e-mail or mailing addresses, and premium information for Settlement Class Members (as reflected in reasonably available computerized account records) to the extent required to administer the Settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 20, 2021.

*Domenick C. DiCicco Jr.*

Domenick C. DiCicco Jr.  
Chief Executive Officer