

**BEFORE THE COMMISSIONER OF INSURANCE
FOR THE STATE OF LOUISIANA**

IN RE: LOUISIANA HEALTH SERVICE & INDEMNITY COMPANY D/B/A BLUE CROSS AND BLUE SHIELD OF LOUISIANA PLAN OF REORGANIZATION REGARDING THE CONVERSION FROM A MUTUAL INSURANCE COMPANY TO A STOCK INSURANCE COMPANY
CAUSE NO. _____

AMENDED PETITION FOR MOTION FOR LEAVE TO FILE PETITION FOR INTERVENTION

NOW INTO COURT, appearing herein in proper person, Intervenor, Thomas A Cotten, CPA CGMA, individually, who respectfully moves the Louisiana Department of Insurance and the Honorable Hearing Officer, Arlene Knighten, for leave to file the Amended Petition for Intervention (the "Petition") pursuant to §1115 of Rule Number 1 – Rules of Practice and Procedure before the Commissioner of Insurance. Attached hereto is the Petition for Intervention providing immediate and direct interest for the undersigned intervenors affected by these proceedings.

WHEREFORE, as provided in the Amended Petition for Intervention, adopted herein by reference, Intervenor prays that this Motion for Leave to File Amended Petition for Intervention be granted.

RESPECTFULLY SUBMITTED:

Thomas A, Cotten, CPA CGMA

Email: thomas@taccpa.com

424 E Main Street

New Roads, LA 70760

Telephone: 225-921-2113



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of August 2023, a copy of the above and foregoing has been sent via electronic mail to the following:

Arlene Knighten,
in care of James David Caldwell
Louisiana Department of Insurance
1702 N. 3rd Street
Baton Rouge, LA 70802
Arlene D. Knighten <arleneknighten@charter.net>

Claire Lemoine
Louisiana Department of Insurance
1702 N. 3rd Street
Baton Rouge, LA 70802
Claire.Lemoine@ldi.la.gov

Sincerely,



Thomas A Cotten, CPA CGMA

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AMENDED PETITION FOR INTERVENTION

NOW INTO COURT, appearing herein in proper person, comes Intervenor, Thomas A. Cotten CPA CGMA who respectfully submit this Amended Petition for Intervention (the "Petition") pursuant to §1115 of rule Number 1-Rules of Practice and Procedure before the Commissioner of Insurance. As more fully explained below, Petitioners' interest is directly and immediately affected by the proceeding in the above-captioned matter. Accordingly, Intervenor respectfully request leave to intervene in the above captioned matter. In opposition of this Petition, Intervenor aver as follows:

I.

Petitioner, Thomas A. Cotten, CPA CGMA, is married to Debbie Bess Cotten who is a member of Louisiana Health Service & Indemnity Company doing business as a mutual insurance company, Blue Cross and Blue Shield of Louisiana ("BCBSLA"). Thomas A Cotten pays for ½ the monthly premiums and my wife Debbie pays the other ½. The membership interest is held by Debbie B Cotten for tax reasons. Louisiana is a Community Property State, as such I am entitled to the benefits of membership since I pay ½ the premiums. BCBSLA proposes a reorganization plan to de-mutualize BCBSLA in its entirety and deprive the members of valid consideration for the sale of the assets of BCBSLA. This plan of reorganization does not properly protect the interest of the policy holders and members and is unfair and inequitable to the members. My interest in liquidation proceeds are diminished with no value. As a member, I am entitled to prorate portion of the proceeds in liquidation based on a member's total monthly participation.

II.

The plan for reorganization provides that all the assets owned by BCBSLA will be transferred to a captive foundation with minimal value given to members. This is not in the best interest of the members.

III.

The plan for reorganization provides that a Foundation has been formed by BCBSLA. The Foundation was established by the Board of BCBSLA in which Foundation Board Members and Advisory are one in the same as BCBSLA Board members. The Foundation Members are paid a fee that is unreasonable and guaranteed a term of 10 years which is unreasonable. This is a conflict of interest and violates the principle of Personal Inurement. Therefore, no liquidation proceeds should be allocated to the Foundation.

WHEREFORE, for the reasons set forth herein, Intervenor prays that this Petition for Intervention be GRANTED.

RESPECTFULLY SUBMITTED:

Thomas A. Cotten, CPA CGMA

thomas@taccpa.com

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New Roads, LA 70760

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