

**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. \_\_\_\_\_

**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 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 Petition for Intervention, adopted herein by reference, Intervenor prays that this Motion for Leave to File Petition for Intervention be granted.

**RESPECTFULLY SUBMITTED:**

**Thomas A, Cotten, CPA CGMA**

Email: [thomas@taccpa.com](mailto:thomas@taccpa.com)

424 E Main Street

New Roads, LA 70760

Telephone: 225-921-2113



**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 14<sup>th</sup> 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. 3<sup>rd</sup> Street  
Baton Rouge, LA 70802  
[David.caldwell@ldi.la.gov](mailto:David.caldwell@ldi.la.gov)

Claire Lemoine  
Louisiana Department of Insurance  
1702 N. 3<sup>rd</sup> Street  
Baton Rouge, LA 70802  
[Claire.Lemoine@ldi.la.gov](mailto:Claire.Lemoine@ldi.la.gov)

Sincerely,

A handwritten signature in blue ink, appearing to read "T. Cotten", written in a cursive style.

Thomas A Cotten, CPA CGMA

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CAUSE NO. \_\_\_\_\_

**PETITION FOR INTERVENTION**

NOW INTO COURT, appearing herein in proper person, comes Intervenor, Thomas A. Cotten CPA CGMA who respectfully submit this 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, Intervenors 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 a member of Louisiana Health Service & Indemnity Company doing business as a mutual insurance company, Blue Cross and Blue Shield of Louisiana ("BCBSLA"). His membership interest is held by his wife Debbie B Cotten for tax reasons. 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.

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.

This is a conflict of interest and is not in the best interest of the members.

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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