

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION

HANNA ALBINA and AUSTIN WILLARD,
individually and on behalf of others similarly
situated,

Plaintiffs,

vs.

THE ALIERA COMPANIES, INC.,
TRINITY HEALTHSHARE, INC., and
ONESHARE HEALTH, LLC d/b/a UNITY
HEALTHSHARE, LLC,

Defendants.

Case No.: 5:20-CV-00496-JMH

ELECTRONICALLY FILED

SUGGESTION OF BANKRUPTCY OF THE ALIERA COMPANIES, INC.

* * * * *

COME the Plaintiffs, individually and on behalf of the class they represent, and hereby notify the Court and all interested parties of bankruptcy proceedings related to Defendant The Alieria Companies, Inc., which is now unrepresented in this action. On December 3, 2021, an involuntary petition for bankruptcy was filed against Defendant the Alieria Companies, Inc., f/k/a Alieria Healthcare, Inc. (“Alieria”) in the United States Bankruptcy Court for the District of Delaware, Case No. 21-11548-JTD. The petition is attached hereto as Exhibit A. Plaintiffs’ Counsel have previously notified counsel for Oneshare Health, LLC.

Respectfully submitted,

ATTORNEYS FOR PLAINTIFF

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* Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. In addition, Plaintiffs have served a copy of this notice on Jon A. Woodall, Luke Morgan, and Scott A. Schuette, McBrayer PLLC, who have been discharged from representation of Trinity, but the time for Trinity to retain replacement counsel has not expired.

BY: /s/ Jerome P. Prather
Jerome P. Prather, Esq.

Fill in this information to identify the case:

United States Bankruptcy Court for the:

____ District of Delaware
(State)Case number (if known): Not Known Chapter 11☐ Check if this is an amended filing**Official Form 205****Involuntary Petition Against a Non-Individual**

12/15

Use this form to begin a bankruptcy case against a non-individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against an individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed**1. Chapter of the Bankruptcy Code**

Check one:

- ☐ Chapter 7
☒ Chapter 11

Part 2: Identify the Debtor**2. Debtor's name** The Alera Companies Inc.**3. Other names you know the debtor has used in the last 8 years**Alera Healthcare, Inc.

Include any assumed names, trade names, or doing business as names.

4. Debtor's federal Employer Identification Number (EIN)☐ Unknown81-1019555 _ _ _ _ _
EIN**5. Debtor's address****Principal place of business**990 Hammond Drive, Suite 700

Number Street

Atlanta

City

GA

State

30328

ZIP Code

Fulton

County

Mailing address, if different

Number Street

P.O. Box

City

State

ZIP Code

Location of principal assets, if different from principal place of business

Number Street

City

State

ZIP Code

Debtor The Alera Companies Inc. Case number (if known) Not Known
Name

6. Debtor's website (URL) https://www.alieracompanies.com

7. Type of debtor
☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other type of debtor. Specify: _____

8. Type of debtor's business
Check one:
☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the types of business listed.
☐ Unknown type of business.

9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?
☐ No
☒ Yes. Debtor Sharity Ministries, Inc. Relationship 11 U.S.C. § 101(2)(D)
District Delaware Date filed 07/08/2021 Case number, if known 21-11001-JTD
MM / DD / YYYY
Debtor _____ Relationship _____
District _____ Date filed _____ Case number, if known _____
MM / DD / YYYY

Part 3: Report About the Case

10. Venue
Check one:
☒ Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district.
☐ A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.

11. Allegations
Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).
The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).
At least one box must be checked:
☒ The debtor is generally not paying its debts as they become due, unless they are the subject of a bona fide dispute as to liability or amount.
☒ Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or an agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

12. Has there been a transfer of any claim against the debtor by or to any petitioner?
☒ No
☐ Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

Debtor The Alera Companies Inc. Case number (if known) Not Known
Name

13. Each petitioner's claim

Name of petitioner

Nature of petitioner's claim

Amount of the claim
above the value of
any lienSee Schedule A, which is

\$ _____

incorporated into this petition by

\$ _____

reference

\$ _____

Total of petitioners' claims

\$ _____

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at the top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each additional petitioning creditor, the petitioner's claim, the petitioner's representative, and the petitioner's attorney. Include the statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

Part 4: Request for Relief

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Petitioners request that an order for relief be entered against the debtor under the chapter of 11 U.S.C. specified in this petition. If a petitioning creditor is a corporation, attach the corporate ownership statement required by Bankruptcy Rule 1010(b). If any petitioner is a foreign representative appointed in a foreign proceeding, attach a certified copy of the order of the court granting recognition.

I have examined the information in this document and have a reasonable belief that the information is true and correct.

Petitioners or Petitioners' Representative**Name and mailing address of petitioner**

See the declarations that are attached this petition as
Name

its Exhibit A, which is incorporated into this petition by

Number Street

reference

City

State

ZIP Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

City

State

ZIP Code

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

Executed on

MM / DD / YYYY

X

Signature of petitioner or representative, including representative's title

Attorneys

Joseph H. Huston, Jr.

Printed name

Stevens & Lee, P.C.

Firm name, if any

919 North Market Street, Suite 1800

Number Street

Wilmington, Delaware 19801

City

State

ZIP Code

Contact phone (302) 425-3310 Email joseph.huston@stevenslee.com

Bar number 4035

State Delaware

X /s/ Joseph H. Huston, Jr.

Signature of attorney

Date signed 12/03/2021
MM / DD / YYYY

Debtor The Alera Companies Inc. Case number (if known) Not Known

Name and mailing address of petitioner

Name _____

Number _____ Street _____

City _____ State _____ ZIP Code _____

Name and mailing address of petitioner's representative, if any

Name _____

Number _____ Street _____

City _____ State _____ ZIP Code _____

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

Executed on _____
MM / DD / YYYY

X

Signature of petitioner or representative, including representative's title _____

Printed name _____

Firm name, if any _____

Number _____ Street _____

City _____ State _____ ZIP Code _____

Contact phone _____ Email _____

Bar number _____

State _____

X

Signature of attorney _____

Date signed _____
MM / DD / YYYY

Name and mailing address of petitioner

Name _____

Number _____ Street _____

City _____ State _____ ZIP Code _____

Name and mailing address of petitioner's representative, if any

Name _____

Number _____ Street _____

City _____ State _____ ZIP Code _____

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

Executed on _____
MM / DD / YYYY

X

Signature of petitioner or representative, including representative's title _____

Printed name _____

Firm name, if any _____

Number _____ Street _____

City _____ State _____ ZIP Code _____

Contact phone _____ Email _____

Bar number _____

State _____

X

Signature of attorney _____

Date signed _____
MM / DD / YYYY

Debtor: The Alieria Companies Inc.

Case Number: Not Available

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	
)	Chapter 11
THE ALIERA COMPANIES INC.,)	
)	Case No.
Debtor. ¹)	
)	

**SCHEDULE A TO
THE INVOLUNTARY PETITION AGAINST THE ALIERA COMPANIES INC.**

This schedule sets forth the names of the petitioners commencing this involuntary case against The Alieria Companies Inc. and the nature and amount of those petitioners' claims against The Alieria Companies Inc.:

Reference Number	Name of the Petitioner or Petitioners	Nature of the Petitioner's or Petitioners' Claim	Amount of the Petitioner's or Petitioners' Claim above the Value of any Lien
1	Austin Willard	Judgment ²	\$16,255.54
2	Hanna Albina and Austin Willard, on behalf of all persons who, while a Kentucky resident, purchased or were covered by a plan from The Alieria Companies Inc. and Sharity Ministries, Inc., which purported to be a	Judgment ³	\$4,679,868.46

¹ The last four digits of the Debtor's federal taxpayer identification number are 9555. The address of the Debtor's principal office is 990 Hammond Drive, Suite 700, Atlanta, Georgia 30328.

² A copy of this judgment is attached to this schedule as its Exhibit 1.

³ A copy of this judgment is attached to this schedule as its Exhibit 1.

Debtor: The Alieria Companies Inc.

Case Number: Not Available

	“health care sharing ministry”		
3	Gerald and Roslyn Jackson	Judgment ⁴	\$12,582.00
4	Dean Mellom	Judgment ⁵	\$3,692.00
5	Gerald Jackson, Roslyn Jackson, and Dean Mellom, on behalf of all Washington residents who acquired plans from or through The Alieria Companies Inc., Alieria Healthcare, Inc., and Sharity Ministries, Inc. or any of those entities’ subsidiaries that purported to be “health care sharing ministry” plans at any time from June 27, 2018 to July 8, 2021	Judgment ⁶	\$21,352,827.08
Sum:			\$26,065,225.08

⁴ A copy of this judgment is attached to this schedule as its Exhibit 2.

⁵ A copy of this judgment is attached to this schedule as its Exhibit 2.

⁶ A copy of this judgment is attached to this schedule as its Exhibit 2.

Debtor: The Alieria Companies Inc.

Case Number: Not Available

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION

HANNA ALBINA and AUSTIN WILLARD,
individually and on behalf of others similarly
situated,

Plaintiffs,

vs.

THE ALIERA COMPANIES, INC.,
TRINITY HEALTHSHARE, INC., and
ONESHARE HEALTH, LLC d/b/a UNITY
HEALTHSHARE, LLC,

Defendants.

Case No.: 5:20-CV-00496-JMH

ELECTRONICALLY FILED

**DEFAULT JUDGMENT AGAINST
THE ALIERA COMPANIES, INC.**

** ** *

It appearing that Defendant the Alieria Companies, Inc., is in default by the failure to appear before the Court by counsel (DE 69), the Clerk having previously noted Alieria's default on the docket by order of the Court (D.E. 70), and seven or more days having elapsed since entry of the default and notice of Plaintiffs' motion for default judgment, without any appearance of Alieria by counsel, the Court having previously certified this matter as a class action pursuant to Fed. R. Civ. P. 23(2) and 23(b)(3) (D.E. 68), the Court having reviewed the motion, memoranda, and evidence submitted by Plaintiffs, the Court now finds as follows.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. The Alieria Companies, Inc. ("Alieria") entered into contracts with Plaintiffs and various Kentucky residents defined in the class herein to pay medical expenses on the determination of certain contingencies. Pursuant to KRS 304.1-030, those contracts constituted

“insurance” and are therefore subject to the Kentucky insurance code. There is an exception to application of the Kentucky insurance code afforded to certain religious organizations by KRS 304.1-120(7), but that exception does not apply to the plans sold by Alieria because, *inter alia*, Alieria is not a nonprofit religious association, Alieria did not limit the sales of its plans to participants who were members of the same denomination or religion, Alieria did not match specific participants who have financial, physical, or medical needs with participants who choose to assist with those needs, the contractual amounts paid to Alieria were not voluntary, and Alieria and Trinity, through its member guide, did assume specific risks or make specific promises to pay certain medical expenses that were not discretionary with Alieria and/or Trinity.

2. Alieria held itself out as providing health care sharing ministry (“HCSM”) products of Trinity HealthShare, Inc. (“Trinity”) (no known as Sharity Ministries, Inc.), but Trinity did not qualify as an HCSM under United States law, 26 U.S.C. § 5000A(d)(2), because, *inter alia*, Trinity or its predecessors have not been in continuous existence since December 31, 1999, and Trinity did not conduct an annual audit performed by an independent certified public accounting firm at all times during its existence. According to the declaration of Neil Luria, no outside audit was performed for the year 2018 or any year thereafter.

3. Alieria misled the class members into entering contracts for a product that was not what it purported to be and did not comply with applicable federal or state law. Because the products Alieria sold to the class members met the definition of insurance under Kentucky law, it was required to comply with the Kentucky insurance code and it failed to do so, to the damage of the class members.

4. Each Plaintiff or class member at his or her option is entitled to rescind his or her contract with Alieria or reform his or her contract with Alieria so as to comply with applicable

insurance law, including Kentucky law and the law of the United States, which among other things, prohibits the exclusion of pre-existing conditions, prohibits waiting periods for coverage, and prohibits insurers from selectively paying claims to different insured in a different manner. Those Plaintiffs or class members who choose to rescind their contracts with Alieria are entitled to judgment in the amount of all payments made to Alieria for purchase of products sold by Trinity Healthshare, Inc. (“rescission damages”). Those Plaintiffs or class members who choose to reform their contracts with Alieria are entitled to judgment in the amount of all claims submitted to Alieria for payment by Trinity Healthshare, Inc., but not previously paid (“reformation damages”).

5. The uncontroverted declaration of Neil Luria (D.E. 64-5), the Chief Restructuring Officer of Sharity Ministries Inc. (the company formerly known as Trinity Healthshare, Inc.), is sufficient evidence of both the amount of contract payments made to Alieria for Trinity plans, and the amount of claims submitted to Alieria but unpaid for Trinity plans. Plaintiff Austin Willard made total contractual payments to Alieria and Trinity of \$16,038.75. Mr. Willard submitted total medical bills to Alieria and Trinity that have not been paid of \$16,255.24. On a classwide basis, the contract payments to Alieria and Trinity by all class members total \$2,189,003, and the medical bills submitted to Alieria and Trinity by all class members that have not been paid total \$3,112,951.

6. Mr. Willard has elected to reform his contract and therefore is entitled to receive judgment of his reformation damages, in an amount of the total medical bills submitted by him to Alieria but unpaid.

7. The class members have not yet had the opportunity to elect the measure of damages each will receive. Presumably, each will make the rational decision to elect to receive

the higher of the rescission damages or reformation damages available to him or her on an individual basis. Neil Luria has provided a Second Declaration, dated November 11, 2021, and filed in the record herein on November 12, 2021. Mr. Luria's Second Declaration provides sufficient evidence of the total amount of damages sustained by the class members, based on each class member's presumed election to take the higher amount of damages available to him or her. The aggregate amount of those damages, based on the presumed individual elections, is \$4,696,124. The Court finds that this amount represents the total damages of the class known at this time.

JUDGMENT

IT IS NOW THEREFORE ORDERED AND ADJUDGED AS FOLLOWS:

The Court grants default judgment in favor of Austin Willard, against The Alera Companies, for reformation of his contract with The Alera Companies in order to comply with applicable insurance laws, in the amount of \$16,255.54.

The Court grants default judgment in favor of the class of all persons who, while a Kentucky resident, purchased or were covered by a plan from Alera and Trinity Healthshare, Inc., that purported to be a "health care sharing ministry." The amount of the judgment is the aggregate rescission damages or reformation damages of the class, presuming each individual class member elects the higher measure of available damages, \$4,696,124, less the judgment in favor of Austin Willard, individually, for a total judgment in favor of the absent class members of \$4,679,868.46.

This 17th day of November, 2021.



Signed By:

Joseph M. Hood *JMH*

Senior U.S. District Judge

Debtor: The Alera Companies Inc.

Case Number: Not Available

Exhibit 2

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GERALD JACKSON, ROSLYN JACKSON,
DEAN MELLOM, JON PERRIN AND JULIE
PERRIN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

THE ALIERA COMPANIES, INC., a
Delaware corporation; ALIERA
HEALTHCARE, INC., a Delaware
corporation; TRINITY HEALTHSHARE,
INC., a Delaware corporation,

Defendants.

NO. 2:19-cv-01281-BJR

**ORDER GRANTING PLAINTIFFS'
MOTION TO STRIKE ALIERA'S
ANSWER AND ENTER DEFAULT
JUDGMENT OR IN THE
ALTERNATIVE TO GRANT
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

THIS MATTER came before the Court on Plaintiffs' Motion for Class Certification. The Court has considered the Plaintiffs' Motion, the Declarations of Eleanor Hamburger, Jon Perrin, Dean Mellom, Roslyn Jackson, Neil F. Luria (both original and supplemental), and all attached Exhibits in Support of Plaintiffs' Motion attached to those declarations, the Declaration of Mailing (Dkt. No. 160) evidencing service of this Court's October 26, 2021 Order (Dkt. No. 159) and Notice of Additional Authorities. No response was received from Defendant Alieria.

ORDER GRANTING PLAINTIFFS' MOTION TO STRIKE
ALIERA'S ANSWER AND ENTER DEFAULT JUDGMENT
ETC. - 1
[Case No. 2:19-cv-01281-BJR]

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SPOONEMORE HAMBURGER PLLC
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SEATTLE, WASHINGTON 98121
TEL. (206) 223-0303 FAX (206) 223-0246

1 The Court has also considered the other pleadings and records on file.

2 Based upon the foregoing, and having found that Alieria is unrepresented,
3 despite service of the Motion and all documents in support of the motion (original and
4 supplemental) at Alieria's last known place of business, and on the recorded Assignee
5 for Alieria, and despite the allowance of sufficient time for Alieria to retain counsel (Dkt.
6 150) and respond, the Court hereby:

7 1. GRANTS Plaintiffs' Motion to Strike Alieria's Answer. The Clerk is hereby
8 ORDERED to strike Alieria's Answer from the record.

9 2. GRANTS Plaintiffs' Motion for Entry of Default.

10 3. GRANTS Plaintiffs' Motion for Default Judgment against Alieria. Pursuant to
11 Fed. R. Civ. P. 55(b)(2), the Court enters a default judgment against Defendant
12 Alieria in favor of Roslyn and Gerald Jackson, Dean Mellom, Jon and Julie
13 Perrin, and the Plaintiff Class. Based upon the records and pleadings herein,
14 and as described in the Court's oral ruling (incorporated herein by reference),
15 the Court concludes that Defendant Alieria designed, marketed, and sold the
16 Named Plaintiffs and the Plaintiff Class unauthorized and illegal health
17 insurance. The Court further concludes that Alieria's acts and omissions were
18 also violations of the Washington Consumer Protection Act. The damages
19 suffered as a result of these illegal and fraudulent practices is as follows:

20 (a) Roslyn and Gerald Jackson suffered damages in the amount of \$12,082.00
21 in reformation damages;

22 (b) Dean Mellom suffered damages in the amount of \$3,442.00 in rescission
23 damages;

24 (c) Jon and Julie Perrin suffered damages in the amount of \$7,107.92 in
25 rescission damages;

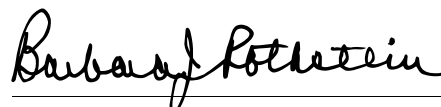
(d) the Plaintiff Class suffered damages totaling \$20,646,077.08 (excluding the damages assessed to the named plaintiffs), reflecting the greater of either (i) rescission damages or (ii) reformation damages for each member of the Class;

(e) the Plaintiffs and Plaintiff Class are also entitled to an additional \$250 per class member in damages stemming from Aliera's violation of the Consumer Protection Act;

(f) Accordingly, the total damages, including CPA damages, for Roslyn and Gerald Jackson is \$12,582.00; for Dean Mellom is \$3,692.00; and for Jon and Julie Perrin, is \$7,607.92. The Plaintiff Class, excluding the claims of the named plaintiffs, is awarded \$21,352,827.08 (\$20,646,077.08 in rescission/reformation damages and \$706,750 in CPA damages). Judgment shall and hereby is entered in these amounts.

4. Orders that Plaintiffs' counsel may petition for attorney fees and litigation costs pursuant to RCW 19.86.090 and *Olympic Steamship Co. v. Centennial Ins. Co.*, 117 Wn.2d 37, 811 P.2d 673 (1991).

DATED: November 11, 2021.



Barbara Jacobs Rothstein
U.S. District Court Judge

1 Presented by:

2 SIRIANNI YOUTZ
3 SPOONEMORE HAMBURGER PLLC

4 s/ Eleanor Hamburger

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9 MYERS & COMPANY, PLLC

10 s/ Michael David Myers

11 Michael David Myers (WSBA #22486)
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18 MEHRI & SKALET, PLLC

19 s/ Jay Angoff

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