

EXHIBIT 4

of insurance as an insurance company in any state: Serve America Assurance; Smart Data Solutions; American Trade Association, LLC; American Trade Association, Inc.; Real Benefits Association.

5. I-SITE is an online interface maintained by the National Association of Insurance Commissioners (“NAIC”) designed for state insurance departments to obtain comprehensive financial, market conduct, company licensing, and securities information. I-SITE offers state insurance departments access to NAIC database information including whether a given company has a certificate of authority to engage in the business of insurance as an insurance company in the other states, or what lines of authority such companies may have in given states to transact insurance business.

6. I have searched the records of the Insurance Division and have determined that the following entities do not have and have never had a certificate of authority issued by the commissioner to engage in the business of an administrator in this State: Serve America Assurance; Smart Data Solutions; American Trade Association, LLC; American Trade Association, Inc.; Real Benefits Association.

7. To date, neither Serve America Assurance, Smart Data Solutions, American Trade Association, LLC, American Trade Association, Inc., nor Real Benefits Association is licensed to issue policies of insurance in the State of Tennessee, or any other state, as an insurance company and none have a licensed insurance company underwriting the limited benefit health plans offered in this State.

8. I have searched the records of the Insurance Division and, as of March 2010, neither Serve America Assurance, Smart Data Solutions, American Trade Association, LLC, American Trade Association, Inc., nor Real Benefits Association has provided any financial information to the

Department of Commerce and Insurance as required by Tenn. Code Ann. § 56-1-501 in order to engage in business of insurance as an insurance company in this State.

9. I have searched the I-SITE database maintained by the National Association of Insurance Commissioners and have determined that, to date, neither Serve America Assurance, Smart Data Solutions, American Trade Association, LLC, American Trade Association, Inc., nor Real Benefits Association has provided any financial information to any other state's insurance division.

10. The law in Tennessee requires that a domestic or foreign insurer must satisfy the commissioner that it is fully and legally organized under the laws of the state or foreign nation of its incorporation. Tenn. Code Ann. § 56-2-103(a)(2). Furthermore, Tenn. Code Ann. § 56-2-103(a)(6)(B) provides that: "the commissioner shall not issue a certificate of authority unless the incorporators, directors and proposed officers are of known good character and there is no good reason to believe that they are affiliated with any person known to have been involved in the improper manipulation of assets, accounts, reinsurance or any matter inimical to the business of insurance."

11. After reviewing the number of cease and desist actions taken in several states, including Tennessee, against Smart Data Solutions, Serve America Assurance, American Trade Association, LLC, American Trade Association, Inc., Real Benefits Association, Bart S. Posey, Obed W. Kirkpatrick, Sr. and Richard H. Bachman, it is unlikely that Bart S. Posey, Obed W. Kirkpatrick, Sr. and Richard H. Bachman could meet the statutory requirement that they be of known good character and that there be no good reason to believe that they are affiliated with any person known to have been involved in the improper manipulation of assets, accounts, reinsurance or any matter

inimical to the business of insurance. It is unlikely that a company for which they are the incorporators, directors or officers could be granted a certificate of authority in the State of Tennessee.

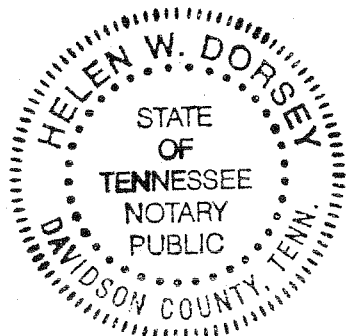
FURTHER AFFIANT SAITH NOT.

Bob J. Ribe
Bob Ribe

SWORN TO AND SUBSCRIBED before me on this 18th day of March, 2010.

Helen W. Dorsey
Notary Public

My Commission Expires: 05/22/2010



My Commission Expires MAY 22, 2010