

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

In re:)	
)	Chapter 11
THE ALIERA COMPANIES INC., <i>et al.</i> ,)	Case No. 21-11548 (JTD)
Debtors. ¹)	Jointly Administered
)	

**VERIFIED STATEMENT UNDER
FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

The undersigned states that:

1. Stevens & Lee, P.C. (“**S&L**”) represents the following creditors in these cases:
 - (a) Neil F. Luria, as the trustee of the liquidating trust arising under the Sharity Ministries, Inc., Trust Agreement (the “**Liquidating Trustee**”);
 - (b) the following creditors (the “**Petitioning Creditors**”), who commenced the involuntary case against The Alieria Companies Inc. (“**Alieria**”):
 - (i) Austin Willard,
 - (ii) Hanna Albina and Austin Willard, as representatives of a certified class comprising 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 “health care sharing ministry,”
 - (iii) Gerald Jackson and Roslyn Jackson,
 - (iv) Dean Mellom, and
 - (v) Gerald Jackson, Roslyn Jackson, and Dean Mellom, as representatives of a certified class comprising 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

¹ The Debtors and the last four digits of their federal taxpayer identification numbers are: The Alieria Companies Inc. (9555); Advevo LLC (6736); Ensurian Agency LLC (3244); Tactic Edge Solutions LLC (2933); and USA Benefits & Administrators LLC (5803).

“health care sharing ministry” plans at any time from June 27, 2018 to July 8, 2021; and

- (c) the following creditors (the “**Non-Petitioning Creditors**,” and with the Liquidating Trustee and the Petitioning Creditors, the “**Clients**”), who did not join the Petitioning Creditors in commencing the involuntary case against Alieria:
 - (i) Jon Perrin and Julie Perrin, as both individuals and representatives of a certified class comprising all Washington residents who acquired plans from or through The Alieria Companies Inc., Alieria Healthcare, Inc., and Sharity Ministries,
 - (ii) Hanna Albina, as an individual,
 - (iii) Corlyn Duncan and Bruce Duncan, as individuals and representatives of a proposed class,
 - (iv) George T Kelly, III and Thomas Boogher, as both individuals and representatives of a proposed class, and
 - (v) Rebecca Smith, Ellen Larson, Justine Lund, Jaime Beard, and Jared Beard, as both individuals and representatives of a proposed class.

2. The following law firms (“**Co-Counsel**,” and with S&L, “**Counsel**”) also represent the Clients:

- (a) Sirianni Youtz Spoonmore Hamburger PLLC and
- (b) Mehri & Skalet, PLLC.

3. Counsel represents each of the Clients, rather than the Clients as a group; however, the Clients are, and compose a group of, creditors that are

- (a) acting in concert to advance their common interests in these cases under Chapter 11 of the Bankruptcy Code and
- (b) not affiliates or insiders of each other.

4. The Petitioning Creditors and the Non-Petitioning Creditors formed a group to pursue their claims against Alieria.

5. Each of the Non-Petitioning Creditors declined or was not eligible to be a petitioning creditor in the involuntary case against Alera; therefore, the Petitioning Creditors commenced the case without the Non-Petitioning Creditors.

6. The Liquidating Trustee joined the Petitioning Creditors’ group later; however, the Liquidating Trustee never joined in the petition that the Petitioning Creditors filed under Chapter 11 of the Bankruptcy Code to commence the involuntary case against Alera.

7. The Clients’ group has informally agreed to act for

- (a) the beneficiaries of the trust arising under
 - (i) the Combined Disclosure Statement and Chapter 11 Plan of Liquidation of Sharity Ministries, Inc. and
 - (ii) Sharity Ministries, Inc., Liquidating Trust Agreement and
- (b) Sharity Ministries, Inc.’s current and former members.

8. The Clients have at least \$626,420,214.00 in claims against the Debtors, including the following claims²:

Ref. No.	Claimant’s Name	Debtor or Debtors Liable on the Claim	Claim’s Nature	Claim’s Amount
1	Hanna Albina	The Alera Companies, Inc.	Judgment Contract Tort Statute Member of Sharity Ministries, Inc.	Share of \$4,679,868.46, plus additional amounts, including post-judgment interest

² The Clients specifically reserve both the right to amend, supplement, or otherwise modify the chart setting forth their claims and the right to assert that any claim that is classified as unliquidated in this chart is in fact liquidated.

Ref. No.	Claimant's Name	Debtor or Debtors Liable on the Claim	Claim's Nature	Claim's Amount
2	Hanna Albina	Advevo LLC Ensurian Agency LLC Tactic Edge Solutions LLC USA Benefits & Administrators LLC	Contract Tort Statute Member of Sharity Ministries, Inc.	Unliquidated
3	Austin Willard	The Alieria Companies, Inc.	Judgment Contract Tort Statute Member of Sharity Ministries, Inc.	\$16,255.54, plus additional amounts, including post-judgment interest
4	Austin Willard	Advevo LLC Ensurian Agency LLC Tactic Edge Solutions LLC USA Benefits & Administrators LLC	Contract Tort Statute Member of Sharity Ministries, Inc.	Unliquidated
5	Hanna Albina and Austin Willard, in Their Representative Capacities	The Alieria Companies, Inc.	Judgment Contract Tort Statute Members of Sharity Ministries, Inc.	\$4,679,868.46, plus additional amounts, including post-judgment interest

Ref. No.	Claimant's Name	Debtor or Debtors Liable on the Claim	Claim's Nature	Claim's Amount
6	Hanna Albina and Austin Willard, in Their Representative Capacities	Advevo LLC Ensurian Agency LLC Tactic Edge Solutions LLC USA Benefits & Administrators LLC	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
7	Roslyn and Gerald Jackson	The Alera Companies, Inc.	Judgment Contract Tort Statute Members of Sharity Ministries, Inc.	\$12,582.00, plus additional amounts, including post-judgment interest
8	Roslyn and Gerald Jackson	Advevo LLC Ensurian Agency LLC Tactic Edge Solutions LLC USA Benefits & Administrators LLC	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
9	Jon and Julie Perrin	The Alera Companies, Inc.	Judgment Contract Tort Statute Members of Sharity Ministries, Inc.	\$7,607.92, plus additional amounts, including post-judgment interest

Ref. No.	Claimant's Name	Debtor or Debtors Liable on the Claim	Claim's Nature	Claim's Amount
10	Jon and Julie Perrin	Advevo LLC Ensurian Agency LLC Tactic Edge Solutions LLC USA Benefits & Administrators LLC	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
11	Dean Mellom	The Alera Companies, Inc.	Judgment Contract Tort Statute Member of Sharity Ministries, Inc.	\$3,692.00, plus additional amounts, including post-judgment interest
12	Dean Mellom	Advevo LLC Ensurian Agency LLC Tactic Edge Solutions LLC USA Benefits & Administrators LLC	Contract Tort Statute Member of Sharity Ministries, Inc.	Unliquidated
13	Roslyn and Gerald Jackson, Jon and Julie Perrin, and Dean Mellom, in Their Representative Capacities	The Alera Companies, Inc.	Judgment Contract Tort Statute Members of Sharity Ministries, Inc.	\$21,352,827.08, plus additional amounts, including post-judgment interest

Ref. No.	Claimant's Name	Debtor or Debtors Liable on the Claim	Claim's Nature	Claim's Amount
14	Roslyn and Gerald Jackson, Jon and Julie Perrin, and Dean Mellom, in Their Representative Capacities	Advevo LLC Ensurian Agency LLC Tactic Edge Solutions LLC USA Benefits & Administrators LLC	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
15	Corlyn and Bruce Duncan	All Five	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
16	Corlyn and Bruce Duncan, in Their Representative Capacities	All Five	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
17	George T Kelly, III	All Five	Contract Tort Statute Member of Sharity Ministries, Inc.	Unliquidated

Ref. No.	Claimant's Name	Debtor or Debtors Liable on the Claim	Claim's Nature	Claim's Amount
18	Thomas Boogher	All Five	Contract Tort Statute Member of Sharity Ministries, Inc.	Unliquidated
19	George T Kelly, III and Thomas Boogher, in Their Representative Capacities	All Five	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
20	Rebecca Smith	All Five	Contract Tort Statute Member of Sharity Ministries, Inc.	Unliquidated
21	Ellen Larson	All Five	Contract Tort Statute Member of Sharity Ministries, Inc.	Unliquidated
22	Justine Lund	All Five	Contract Tort Statute Member of Sharity Ministries, Inc.	Unliquidated

Ref. No.	Claimant's Name	Debtor or Debtors Liable on the Claim	Claim's Nature	Claim's Amount
23	Jaime and Jared Beard	All Five	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
24	Rebecca Smith, Ellen Larson, Justine Lund, Jaime Beard, and Jared Beard, in Their Representative Capacities	All Five	Contract Tort Statute Members of Sharity Ministries, Inc.	Unliquidated
25	Liquidating Trustee	All Five	Contract Tort Statute Voidable Transactions	Unliquidated Estimate of \$600,347,381.00, plus attorney's fees and costs
Sum:				Unliquidated Estimate of at least \$626,420,214

9. None of the Clients has any known "disclosable economic interest" other than as disclosed in the preceding paragraphs.

10. Other than as disclosed herein, S&L, to the best of its knowledge and information,

- (a) does not currently represent or claim to represent any other entity in any of the Debtors' cases under the Bankruptcy Code and
- (b) does not hold any claim against or interest in any of the Debtors or any of their estates.

11. Counsel also represents the Clients in another bankruptcy case in this Court, *In re Sharity Ministries, Inc.*, Case No. 21-11001 (JTD), and represents the Liquidating Trustee in any other proceeding to which he is a party or in which he has intervened to protect the property that he holds in trust.

12. And Co-Counsel represents other entities, including the Clients other than the Liquidating Trustee, in actions and other proceedings against one or more of the Debtors. That is, Co-Counsel represents Gerald Jackson, Roslyn Jackson, Dean Mellom, Jon Perrin, Julie Perrin, Corlyn Duncan, Bruce Duncan, George T Kelly, III, Thomas Boogher, Rebecca Smith, Ellen Larson, Justine Lund, Jaime Beard, Jared Beard, Hanna Albina, and Austin Willard, in both their individual capacities and their capacities as class representatives in the following civil actions:

- (a) *Jackson v. The Alieria Companies, Inc.*, Civil Action No. 2:19-cv-01281-BJR (W.D. Wash.);
- (b) *Duncan v. The Alieria Companies, Inc.*, Civil Action No. 2:20-cv-00867-TLN-KJN (E.D. Cal.);
- (c) *Kelly v. The Alieria Companies, Inc.*, Civil Action No. 3:20-cv-05038-MDH (W.D. Mo.);
- (d) *Smith v. The Alieria Companies, Inc.*, Civil Action No. 1:20-cv-02130-RBJ (D. Colo); and
- (e) *Albina v. The Alieria Companies, Inc.*, Civil Action No. 5:20-cv-00496-JMH (C.D. Ky.).

13. Counsel has omitted the Clients' addresses from this statement; however, Counsel will make the Clients' addresses available to

- (a) the Court,
- (b) the United States Trustee, and
- (c) any party in interest who makes a reasonable request for the addresses.

14. Counsel and the Clients reserve their rights to amend, supplement, or otherwise modify this statement, and they are providing this statement without forfeiture of, waiver of, or other prejudice to Counsel's and the Clients' rights to file any other papers, including the following, in one or more of these cases:

- (a) proofs of claim,
- (b) motions, applications, and other requests for relief, including requests for the allowance and/or payment of an administrative expense,
- (c) pleadings, including
 - (i) complaints commencing adversary proceeding and
 - (ii) answers and other responsive pleadings,
- (d) notices,
- (e) statements, including verified statements under FED. R. BANKR. P. 2019 amending, supplementing, or otherwise modifying this statement, and
- (f) instruments, and
- (g) papers and documents of any other kind whatsoever.

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The undersigned, on behalf of Counsel and the Clients, verifies under penalty of perjury that the foregoing is true and correct.

Executed on: April 21, 2022

/s/ David W. Giattino

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