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STATE OF WASHINGTON  
OFFICE OF INSURANCE COMMISSIONER

RENT-A-CENTER, INC.  
RENT-A-CENTER WEST, INC.

No. 14-0082

and

BENEFIT MARKETING SOLUTIONS, LLC and  
BENEFIT SERVICES ASSOCIATION,

BENEFIT MARKETING  
SOLUTIONS, LLC; BENEFIT  
SERVICES ASSOCIATION; RENT-  
A-CENTER, INC.; AND RENT-A-  
CENTER WEST, INC.'S WITNESS  
AND EXHIBIT LIST

Benefit Marketing Solutions, LLC, Benefit Services Association, Rent-A-Center, Inc.  
and Rent-A-Center West, Inc. ("Respondents") expect calling the following witnesses for the  
hearing to be held on January 12, 2015:

1. Bradley Denison  
900 36th Avenue NW, Suite 105  
Norman, OK 73072  
405-579-8525

Mr. Denison will testify regarding all of the defenses that Respondents have in this  
matter. Mr. Denison's testimony will include evidence as to why the Respondents  
are not selling service contracts, insurance, or taking any other acts in violation of  
RCW 48.

2. Annalisa Gellerman  
Office of the Insurance Commissioner

Ms. Gellerman will testify regarding why the acts of the Office of the Insurance  
Commissioner in issuing the Amended Cease and Desist Order and determining  
the \$100,000.00 fine amount are arbitrary and capricious.

1 3. Representative from Office of Insurance Commissioner's Rate Filing Department

2 The representative will testify regarding the requirements of a rate filing and the  
3 testimony will demonstrate how the program offered by Respondents does not fit  
4 within the statutory framework of RCW 48.

5 Respondents identify the following exhibits that it plans to use at hearing:

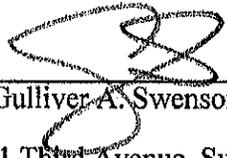
6 Exhibit No.	Description	No. of pages
7 1	Benefits Plus Program Brochure	22
8 2	Benefits Plus Discount Program Membership Form	1
9 3	Lyndon Southern Insurance Company Contractual Liability Insurance Policy	5
10 4	State of Oklahoma Approval of Lyndon Southern CLIP	2
11 5	Schedule A to Lyndon Southern CLIP	1
12 6	Amended and Restated Constitution and By-laws of Benefit Services Association	3
13 7	Articles of Amendment – Transfer of Membership Agreement	6
14 8	Articles of Incorporation and Articles of Amendment – National Association of E Business Owners and	14
15 9	Articles of Amendment – America's Health Care Consumer Corporation	3
16 10	Articles of Amendment – Name change to Benefit Services Association	3
17 11	Bylaws of Amercia's Health Care Consumer Association	17
18 12	Amended Order to Cease and Desist	3
19 13	Demand for Administrative Hearing	1
20 14	Second Amended Notice of Request for Hearing and Imposition of Fines	6

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15	Email from Gulliver Swenson to AnnaLisa Gellerman and Marcia Stickler with attached Settlement Term Sheet	3
16	December 11, 2013 Letter from Ronald DeMoss to Bobby Frye	4
17	February 17, 2014 Letter from Dwight Dumler to Bobby Frye	2
18	RAC Benefits Plus Welcome Brochure	2

DATED this 5th day of January, 2015.

RYAN, SWANSON & CLEVELAND, PLLC

By   
Gulliver A. Swenson, WSBA #35974

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