

BEFORE THE INSURANCE COMMISSIONER OF THE  
STATE OF OKLAHOMA

**FILED**

FEB 12 2024

STATE OF OKLAHOMA, ex rel. GLEN )  
MULREADY, Insurance Commissioner, )  
 )  
Petitioner, )  
v. )  
 )  
SCRIP WORLD, LLC )  
 )  
Respondent. )  
 )

**INSURANCE COMMISSIONER  
OKLAHOMA**

CASE NO. 23-0445-DIS

**CONDITIONAL ADMINISTRATIVE ORDER**

**COMES NOW** the State of Oklahoma, ex rel. Glen Mulready, Insurance Commissioner,  
by and through counsel, Tyler P. Trammell, and alleges and states as follows:

**JURISDICTION**

1. Glen Mulready is the Insurance Commissioner of the State of Oklahoma and, as such, is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, 36 O.S. §§ 101 *et seq.* and 59 O.S. §§ 357-360.

2. Respondent Scrip World, LLC (“Respondent”) holding SBS Company Number 513771342, is licensed by the State of Oklahoma as a pharmacy benefits manager (hereinafter referred to as “PBM”). Respondent’s address of record is 10150 S. Centennial Parkway, Ste. 450, Sandy, Utah 84074.

3. Pursuant to 59 O.S. § 358, a PBM shall be licensed in order to provide pharmacy benefits management, or any services included under the definition of pharmacy benefits management found in Oklahoma Statutes, and must comply with all applicable laws, rules, and regulations.

4. Pursuant to OAC 365:25-29-15, the Insurance Commissioner shall have power and authority to examine and investigate the affairs of every PBM engaged in pharmacy benefits management in the state in order to determine whether it is in compliance with all applicable provisions of Title 36 and Title 59 of the Oklahoma Statutes and Title 365 of the Oklahoma Administrative Code and may take disciplinary action to enforce the same.

5. Pursuant to 59 O.S. § 358(d), the Department “may suspend, revoke or refuse to reissue or renew a license for noncompliance with any of the provisions hereby established or with the rules promulgated by the Department; for conduct likely to mislead, deceive or defraud the public or the Department; for unfair or deceptive business practices or for nonpayment of a renewal fee or fine. The Department may also levy administrative fines for each count of which a PBM has been convicted in a Department hearing.”

6. Pursuant to 36 O.S. § 908, the Commissioner may, if the Commissioner finds that any person or organization has violated the provisions of any statute for which the Commissioner has jurisdiction, impose a penalty of not less than One Hundred Dollars (\$100.00) no more than five Thousand Dollars (\$5,000.00) for each such violation. Such penalties may be in addition to any other penalty provided by law.

#### **FINDINGS OF FACT**

7. On April 28, 2023, the Oklahoma Insurance Department’s PBM Compliance and Enforcement Office notified Respondent that its license was set to lapse as of midnight, April 30, 2023.

8. By May 18, 2023, Respondent had applied for, and filed, all of its renewal documentation and paid the \$500.00 reinstatement fee.

9. Respondent conducted and engaged in pharmacy benefits management in the State of Oklahoma for a period of seventeen (17) days from the lapse of their license on April 30, 2023, to the submission of the completed renewal documentation and paying of the \$500 reinstatement fee on May 18, 2023.

10. On June 29, 2023, Respondent filed with the Department its PBM Activity Attestation. Respondent admitted that its license had expired on April 30, 2023. Respondent further admitted that it conducted 3,607 transactions amounting to \$677,363.00 while covering approximately 1,699 lives in the 60 days between the expiration of its license on April 30, 2023 and the filing of the June 29, 2023, PBM Activity Attestation.

#### **CONCLUSIONS OF LAW**

11. Respondent has violated 59 O.S. § 358 by continuing to provide pharmacy benefits management services for a total of seventeen (17) days without a license.

#### **ORDER**

**IT IS THEREFORE ORDERED** that Respondent is hereby **FINED** Five Thousand Seven Hundred dollars (\$5,700.00). The fine shall be paid within 30 days of the date of this Conditional Administrative Order and made payable to the Oklahoma Insurance Department. The fine shall be sent to the Oklahoma Insurance Department located at 400 NE 50<sup>th</sup> Street, Oklahoma City, Oklahoma 73105 by check or money order with the case number 23-0445-DIS in the Memo line. Failure to comply with a proper order of the Commissioner will result in further administrative action.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** by the Insurance



Commissioner that this Order is a Conditional Order. Unless Respondent requests a hearing with respect to the Findings of Fact set forth above within 30 days of the date of this Conditional Order, the penalties set forth above will become a Final Order on the 31st day following the date of mailing this Order. A request for hearing should be in writing and addressed to Tyler P. Trammell, Oklahoma Insurance Department, Legal Division, 400 NE 50<sup>th</sup> Street, Oklahoma City, Oklahoma 73105. The request for hearing must state the grounds for the request to set aside or modify the Order and must be served on the Oklahoma Insurance Department within the 30 days allotted. The proceedings on such requested hearing will be conducted in accordance with the Oklahoma Insurance Code, 36 O.S. §§ 101 et seq., and the Oklahoma Administrative Procedures Act, 75 O.S. §§ 250 through 324. If Respondent serves a timely request for hearing on the Oklahoma Insurance Department, this Conditional Order will act as a notice of the matters to be reviewed at the hearing and the Findings of Fact, Conclusions of Law, and penalties imposed in this Conditional Order shall be considered withdrawn, pending final resolution at the hearing.

WITNESS My Hand and Official Seal this February 12<sup>th</sup>, 2024.



GLEN MULREADY  
INSURANCE COMMISSIONER  
STATE OF OKLAHOMA

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Oklahoma Insurance Department  
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**CERTIFICATE OF MAILING**

I hereby certify that a true and correct copy of the above and foregoing *Conditional Order* was mailed by regular mail and by certified mail, with postage prepaid and return receipt requested, on this February 12<sup>th</sup>, 2024, to:

Cheryl Kelly  
Scrip World, LLC  
300 Corporate Pkwy, Ste. 2  
Amherst, NY 14226

**CERTIFIED MAIL NO. 9589 0710 5270 0679 4453 90**



Tyler P. Trammell  
Assistant General Counsel