

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
<i>ex rel.</i> ANDREW SHEA,)	
)	
Plaintiff,)	Civil Action No. 21-cv-11777-DJC
)	Hon. Denise J. Casper
v.)	
)	
eHEALTH, INC., et al.,)	
)	
Defendants.)	
)	
_____)	

DEFENDANT GOHEALTH, INC.’S
ANSWER TO THE UNITED STATES OF AMERICA’S
COMPLAINT IN PARTIAL INTERVENTION

Defendant GoHealth Inc. (“GoHealth”) answers the United States of America (the “Government”)’s Complaint in Partial Intervention (ECF No. 41) (the “Complaint”) as follows, based upon its present knowledge, belief, and investigation of the Government’s allegations. Except as expressly stated otherwise, GoHealth’s answers pertain only to allegations as they relate to GoHealth.

Defendant denies all allegations in the headings and subheadings of the Complaint. To the extent a response is required to the “Preliminary Statement,” the allegations contained in the “Preliminary Statement” are denied.

RESPONSE TO “I. JURISDICTION AND VENUE”

1. Paragraph 1 states a legal conclusion. To the extent a response is required, GoHealth admits that the Court has subject matter jurisdiction over the remaining claims in the Complaint.

2. Paragraph 2 states legal conclusions. To the extent a response is required, as to the first two sentences of Paragraph 2, GoHealth admits that 31 U.S.C. § 3732(a) states that “[a]ny action under [31 U.S.C. §] 3730 may be brought in any judicial district in which the defendant or, in the case of multiple defendants, any one defendant can be found, resides, transacts business, or in which any act proscribed by [31 U.S.C. §] 3729 occurred.” Regarding the final sentence of Paragraph 2, GoHealth admits that it helped enroll beneficiaries in Massachusetts in certain plans offered by one or more Defendant Insurers. GoHealth admits that the Court may exercise personal jurisdiction over it with respect to the remaining claims in the Complaint. GoHealth denies the allegations in Paragraph 2 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 2 to the extent they relate to the other Defendants and on that basis denies the allegations.

3. Paragraph 3 states legal conclusions. To the extent a response is required, GoHealth admits that 31 U.S.C. § 3732(a) states that “[a]ny action under [31 U.S.C. §] 3730 may be brought in any judicial district in which the defendant or, in the case of multiple defendants, any one defendant can be found, resides, transacts business, or in which any act proscribed by [31 U.S.C. §] 3729 occurred.” GoHealth admits that this Court is a proper venue for the remaining claims in the Complaint. GoHealth otherwise denies the allegations set forth in Paragraph 3.

RESPONSE TO “II. PARTIES”

A. Response to “Plaintiff and Relator”

4. GoHealth admits that the Government is the Plaintiff in this action. GoHealth further admits that the Department of Health and Human Services (“HHS”), through its component agency, the Centers for Medicare and Medicaid Services (“CMS”), administers the Medicare

program. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 4 and on that basis denies the allegations.

5. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first sentence of Paragraph 5 and on that basis denies the allegations. GoHealth admits that, in November 2021, Relator Andrew Shea filed an action in this Court alleging violations of the FCA, purportedly on behalf of himself and the United States pursuant to the *qui tam* provision of the FCA, 31 U.S.C. § 3730(b)(1). GoHealth otherwise denies the allegations in Paragraph 5, including any implicit allegation that the *qui tam* provision of the FCA complies with the United States Constitution.

B. Response to “Defendants”

6. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 6 and on that basis denies the allegations.

7. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 7 and on that basis denies the allegations.

8. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 8 and on that basis denies the allegations.

9. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 9 and on that basis denies the allegations.

10. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 10 and on that basis denies the allegations.

11. GoHealth admits the allegations in the first sentence in Paragraph 11. GoHealth otherwise denies the allegations in the second sentence in Paragraph 11.

12. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 12 and on that basis denies the allegations.

13. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 13 and on that basis denies the allegations.

14. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 14 and on that basis denies the allegations.

RESPONSE TO “III. LEGAL FRAMEWORK AND INDUSTRY BACKGROUND”

A. Response to “The False Claims Act”

15. The allegations in Paragraph 15 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that the FCA was originally enacted in 1863 to address fraud on the Government during the Civil War. GoHealth otherwise denies the allegations set forth in Paragraph 15.

16. The allegations in Paragraph 16 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that 31 U.S.C. § 3729(a)(1) presently states that “... any person who (A) knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval; [or] (B) knowingly makes, uses, or causes to be made or used, a false record or statement material to a false or fraudulent claim; [or] (C) conspires to commit a violation of subparagraph (A) [or] (B) ... is liable to the United States Government for a civil penalty [and specified damages].” GoHealth otherwise denies the allegations set forth in Paragraph 16.

17. The allegations in Paragraph 17 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that 31 U.S.C. §§ 3729(b)(1)(A) and 3729(b)(1)(B) presently include the quoted language,

along with other language and context that Paragraph 17 omits. GoHealth otherwise denies the allegations set forth in Paragraph 17.

18. The allegations in Paragraph 18 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that 31 U.S.C. § 3729(b)(2) presently includes the quoted language, along with other language and context that Paragraph 18 omits. GoHealth otherwise denies the allegations in Paragraph 18.

19. The allegations in Paragraph 19 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that 31 U.S.C. § 3729(b)(4) presently includes the quoted language, along with other language and context that Paragraph 19 omits. GoHealth otherwise denies the allegations in Paragraph 19.

20. The allegations in Paragraph 20 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that 31 U.S.C. § 3729(a) presently states that a person who engages in certain specified activities "... is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000 as adjusted by the Federal Civil Penalties Inflation Adjustment Act of 1990 plus 3 times the amount of damages which the Government sustains because of the act of that person." GoHealth admits that 89 Fed. Reg. 9764 presently states the minimum per claim penalty is \$13,946 and the maximum per claim penalty is \$27,894. GoHealth otherwise denies the allegations set forth in Paragraph 20.

B. Response to "The Anti-Kickback Statute"

21. The allegations in Paragraph 21 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits the federal Anti-Kickback Statute, 42 U.S.C. § 1320a-7b(b), was enacted by Congress in 1972. GoHealth otherwise denies the allegations in Paragraph 21.

22. The allegations in Paragraph 22 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits Congress amended the AKS in 1977, 1987, and 2010. GoHealth otherwise denies the remaining allegations in Paragraph 22.

23. The allegations in Paragraph 23 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 U.S.C. § 1320a-7b(b), presently describes certain “illegal remunerations.” GoHealth otherwise denies the allegations in Paragraph 23.

24. The allegations in Paragraph 24 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 U.S.C. § 1320a-7b(b)(1), presently states: “Whoever knowingly and willfully solicits or receives any remuneration including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in cash or in kind (A) in return for referring an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part under a federal healthcare program; or (B) in return for purchasing, leasing, ordering, or arranging for or recommending purchasing, leasing, or ordering any good, facility, service or item for which payment may be made in whole or in part under a Federal healthcare program, shall be guilty of a felony and upon conviction thereof, shall be fined not more than \$100,000 or imprisoned

for not more than 10 years, or both.” GoHealth otherwise denies any remaining allegations in Paragraph 24.

25. The allegations in Paragraph 25 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 U.S.C. § 1320a-7b(b)(2), presently states: “Whoever knowingly and willfully offers or pays any remuneration (including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in case or in kind to any person to induce such person (A) to refer an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part under a federal health care program; or (B) to purchase, lease, order, or arrange for or recommend purchasing, leasing, or ordering any good, facility, service, or item for which payment may be made in whole or in part under a Federal health care program, shall be guilty of a felony and upon conviction thereof, shall be fined not more than \$100,000 or imprisoned for not more than 10 years, or both.” GoHealth otherwise denies any remaining allegations in Paragraph 25.

26. The allegations in Paragraph 26 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth denies the allegations in Paragraph 26.

27. The allegations in Paragraph 27 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 U.S.C. § 1320a-7b(f) presently contains language stating that a “Federal health care program,” for purposes of that section, is defined as: “(1) any plan or program that provides health benefits, whether directly, through insurance, or otherwise, which is funded directly, in whole or in part, by the United States Government (other than the health insurance program under chapter

89 of title 5); or (2) any State health care program, as defined in section 1320a-7(h) of this title.” GoHealth otherwise denies the allegations in Paragraph 27.

28. The allegations in Paragraph 28 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 U.S.C. § 1320a-7b(h), presently states “with respect to violations of this section, a person need not have actual knowledge of this section or specific intent to commit a violation of this section.” GoHealth otherwise denies the remaining allegations in Paragraph 28.

29. The allegations in Paragraph 29 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth denies the allegations in Paragraph 29.

30. The allegations in Paragraph 30 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth denies the allegations in Paragraph 30.

31. The allegations in Paragraph 31 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth denies the allegations in Paragraph 31.

32. The allegations in Paragraph 32 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth denies the allegations in Paragraph 32.

33. GoHealth denies the allegations in Paragraph 33.

C. Response to “Medicare”

34. GoHealth admits the allegations set forth in Paragraph 34.

35. GoHealth admits the allegations set forth in Paragraph 35.

36. GoHealth admits that Medicare Part C, also known as the Medicare Advantage program, provides an alternative to Medicare Parts A and B. GoHealth otherwise denies the allegations in Paragraph 36.

1. Response to “Overview of Medicare Advantage”

37. The allegations in Paragraph 37 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that, under the Medicare Advantage program, Medicare beneficiaries can elect to receive their benefits through privately-run insurance plans instead of traditional Medicare Parts A and B. GoHealth further admits that 42 C.F.R. § 422.50(a) currently sets forth eligibility requirements for an individual to select a Medicare Advantage plan, which include (but are not limited to) that the individual is “entitled to Medicare under Part A and enrolled in Part B (except that an individual entitled only to Part B and who was enrolled in an HMO or CMP with a risk contract under part 417 of this chapter on December 31, 1998 may continue to be enrolled in the MA organization as an MA plan enrollee).” GoHealth otherwise denies the allegations in Paragraph 37.

38. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 38 and on that basis denies the allegations.

39. The allegations in Paragraph 39 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that Medicare Advantage plans are operated and managed by Medicare Advantage Organizations (“MAOs”) that contract with CMS. GoHealth otherwise denies any remaining allegations in Paragraph 39.

40. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 40 and on that basis denies the allegations.

41. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 41 and on that basis denies the allegations.

42. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 42 and on that basis denies the allegations.

43. The allegations in Paragraph 43 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 43 and on that basis denies the allegations.

44. The allegations in Paragraph 44 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 44 and on that basis denies the allegations.

45. The allegations in Paragraph 45 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 45 and on that basis denies the allegations.

46. The allegations in Paragraph 46 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 46 and on that basis denies the allegations.

47. The allegations in Paragraph 47 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks

knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 47 and on that basis denies the allegations.

48. The allegations in Paragraph 48 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits that a particular Medicare Advantage plan's provider network, drug coverage, other benefits, and premiums may change from year to year and that Paragraph 48 accurately summarizes the default rules about how frequently Medicare beneficiaries may opt to change Medicare Advantage plans (although there are exceptions and other nuances to those rules not addressed in Paragraph 48). GoHealth otherwise denies any remaining allegations in Paragraph 48.

49. The allegations in Paragraph 49 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits a beneficiary can disenroll from a Medicare Advantage Plan during either the Annual Enrollment Period or during an Open Enrollment Period. GoHealth otherwise denies the remaining allegations in Paragraph 49.

50. The allegations in Paragraph 50 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 50 and on that basis denies the allegations.

51. The allegations in Paragraph 51 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 51 and on that basis denies the allegations.

2. Response to “Broker Operations Within Medicare Advantage”

52. GoHealth admits the allegations in Paragraph 52.

53. GoHealth admits the allegations in Paragraph 53 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations set forth in Paragraph 53 and on that basis denies the allegations.

54. GoHealth admits it provides sales and enrollment services, but otherwise denies the allegations in the first sentence in Paragraph 54. GoHealth admits it created and/or published advertisements for its services and the Medicare Advantage program generally in various places, including on television, online, and via mailers. GoHealth otherwise denies the allegations in the second sentence in Paragraph 54 as they relate to GoHealth. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the last sentence in Paragraph 54 and on that basis denies the allegations. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of any of the allegations in Paragraph 54 and on that basis denies the allegations.

55. GoHealth admits that its advertisements were often not specific, or co-branded with, a particular MAO, and that it promoted its services and the Medicare Advantage program generally in advertisements. The last sentence in Paragraph 55 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the remaining allegations in Paragraph 55 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of any of the allegations in Paragraph 55 and on that basis denies the allegations.

56. GoHealth admits beneficiaries could call GoHealth directly. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 56 and on that basis denies the allegations.

57. GoHealth admits that it sometimes purchased beneficiary contact information from third parties. GoHealth denies the remaining allegations in Paragraph 57 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 57 and on that basis denies the allegations.

58. GoHealth admits it conducted its services by telephone and operated an online platform. GoHealth denies the remaining allegations in Paragraph 58 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 58 and on that basis denies the allegations.

59. GoHealth denies the allegations in Paragraph 59 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of any of the allegations in Paragraph 59 and on that basis denies the allegations.

60. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 60 and on that basis denies the allegations.

61. Paragraph 61 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 61 and on that basis denies the allegations.

62. Paragraph 62 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or

information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 62 and on that basis denies the allegations.

63. GoHealth denies the allegations in Paragraph 63.

64. GoHealth denies the allegations in Paragraph 64.

65. GoHealth denies the allegations in Paragraph 65.

66. Paragraph 66 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 66 and on that basis denies the allegations.

67. GoHealth admits that 73 Fed. Reg. 28556, 28583 (May 16, 2008) contains the quoted language but otherwise denies the allegations in Paragraph 67.

68. GoHealth denies the allegations in Paragraph 68 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 68 and on that basis denies the allegations.

69. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 69 and on that basis denies the allegations.

70. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 70 and on that basis denies the allegations.

71. GoHealth denies the allegations in Paragraph 71.

72. GoHealth denies the allegations in Paragraph 72.

73. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 73 and on that basis denies the allegations.

74. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 74 and on that basis denies the allegations.

3. Response to “Statutes and Regulations Related to Broker Compensation and Payments to Brokers”

75. The allegations in Paragraph 75 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.2274(c) presently includes the language: “MA organizations must oversee first tier, downstream, and related entities that represent the MA organization to ensure agents and brokers abide by all applicable State and Federal laws, regulations, and requirements.” GoHealth otherwise denies any remaining allegations in Paragraph 75.

76. The allegations in Paragraph 76 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 U.S.C. § 1395w-21(j)(2)(D) presently includes the language: “such guidelines shall ensure that the use of compensation creates incentives for agents and brokers to enroll individuals in the Medicare Advantage plan that is intended to best meet their health care needs.” GoHealth otherwise denies any remaining allegations in Paragraph 76.

77. The allegations in Paragraph 77 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.2274(a) presently includes language starting that “compensation” “includes monetary or non-monetary remuneration of any kind relating to the sale, renewal, or services related to a plan or product offered by an MA organization including, but not limited to the following: commissions, bonuses, gifts, prizes or awards.” GoHealth otherwise denies any remaining allegations in Paragraph 77.

78. The allegations in Paragraph 78 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.2274(d)(3) presently includes the language: “For each enrollment in a renewal year for contract years through contract year 2024, MA plans may pay compensation at a rate of up to 50 percent of FMV.” GoHealth otherwise denies any remaining allegations in Paragraph 78.

79. Paragraph 79 purports to characterize statutory and regulatory provisions that speak for themselves, and to state legal conclusions, to which no response is required. To the extent a response is required, GoHealth admits that MAOs could, and can, lawfully make administrative payments, which are sometimes call “overrides,” to brokers. Further answering, GoHealth states that such payments could, and can, be “based on” enrollments of beneficiaries. GoHealth otherwise denies the allegations in Paragraph 79.

80. The allegations in Paragraph 80 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.2274(b)(1)(iv) (2020) includes the language: “If the MA organization contracts with a third party entity such as a Field Marketing Organization or similar type entity to sell its insurance products, or perform services (for example training, customer service, or agent recruitment)... the amount paid to the third party for services other than selling insurance products, if any, must be fair market value and must not exceed an amount that is commensurate with the amounts paid by the MA organization to a third party for similar services during each of the previous 2 years.” GoHealth otherwise denies any remaining allegations in Paragraph 80.

81. The allegations in Paragraph 81 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth

admits 42 C.F.R. § 422.2274(e) presently contains the header “payments other than compensation (administrative payments)” and includes the language: “payments made for services other than enrollment of beneficiaries (for example, training, customer service, agent recruitment, operational overhead, or assistance with completion of health risk assessments) must not exceed the value of those services in the marketplace.” GoHealth otherwise denies any remaining allegations in Paragraph 81.

82. GoHealth admits 86 Fed. Reg. 5864, 5994 (Jan. 19, 2021) contains the language: “As proposed and finalized, all payments of this type must not exceed the value of those services in the marketplace. This standard is intended to ensure that plans do not use these administrative payments as a means to circumvent the limits on compensation to agents and brokers. Plans must limit these payments to the amounts that would be fairly negotiated on the open market for the administrative services being performed and should be able to demonstrate that the administrative payments were made for actual performance when necessary.” GoHealth otherwise denies the remaining allegations in Paragraph 82.

83. GoHealth admits 73 Fed. Reg. 54226, 54239 (Sept. 18, 2008) includes the language: “the compensation structure is designed to help prevent inappropriate moves of beneficiaries from plan-to-plan. Parties remain responsible, however, for compliance with fraud and abuse laws, including the anti-kickback statute. Depending on the circumstances, agent and broker relationships can be problematic under the anti-kickback statute if they involve, by way of example only, compensation in excess of fair market value, compensation structures tied to the health status of the beneficiary (for example, cherry-picking), or compensation that varies based on the attainment of certain enrollment targets.” GoHealth admits 73 Fed. Reg. 67406, 67410 (Nov. 14, 2008) includes the language: “all parties should be mindful that their compensation

arrangements including arrangements with FMOs and other similar type entities must comply with the fraud and abuse laws, including the anti-kickback statute.” GoHealth otherwise denies the remaining allegations in Paragraph 83.

4. Response to “Statutes and Regulations Related to Discrimination Against Disabled Beneficiaries”

84. The allegations in Paragraph 84 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.2 presently includes the language: “Each MA plan must be available to all MA-eligible individuals within the plan’s service area.” GoHealth admits 42 U.S.C. § 1395w-21(g)(1) presently includes the language: “A Medicare+Choice organization shall provide that at any time during which elections are accepted under this section with respect to a Medicare+Choice plan offered by the organization, the organization will accept without restrictions individuals who are eligible to make such election.” GoHealth otherwise denies the allegations in Paragraph 84.

85. The allegations in Paragraph 85 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 29 U.S.C. § 794 presently includes the language: “No otherwise qualified individual with a disability in the United States, as defined in section 705(20) of this title, shall, solely by reason of her or his disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service.” GoHealth otherwise the allegations in Paragraph 85.

86. The allegations in Paragraph 86 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 45 C.F.R. § 92.4 presently includes language purporting to define “disability” as: “with

respect to an individual, a physical or mental impairment that substantially limits one or more major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment, as defined and construed in the Rehabilitation Act, which incorporates the definition of “disability” in the ADA.” GoHealth admits 42 U.S.C. § 416(i)(1) presently includes language purporting to define “disability” as: “(A) inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or has lasted or can be expected to last for a continuous period of not less than 12 months, or (B) blindness.” GoHealth otherwise denies any remaining allegations in Paragraph 86.

87. The allegations in Paragraph 87 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 20 C.F.R. Pt. 404, Subpt. P., Appx. 1 presently includes leukemia, cerebral palsy, Down syndrome, muscular dystrophy, spinal cord injuries resulting in paralysis, cystic fibrosis, and Huntington’s disease in the listing of impairments. GoHealth otherwise denies any remaining allegations in Paragraph 87.

88. The allegations in Paragraph 88 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 U.S.C. § 1395c presently includes the language: “individuals under age 65 who have been entitled for not less than 24 months to benefits under subchapter II of this chapter (or would have been so entitled to such benefits if certain government employment were covered employment under such subchapter) or under the railroad retirement system on the basis of disability.” GoHealth admits 42 U.S.C. § 423(c)(2) presently includes the language: “The term “waiting period” means, in the case of any application for disability insurance benefits, the earliest

period of five consecutive calendar months.” GoHealth otherwise denies any remaining allegations in Paragraph 88.

89. The allegations in Paragraph 89 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 U.S.C. § 1395w-22(b)(1) presently includes the language: “A Medicare Advantage organization may not deny, limit, or condition the coverage or provision of benefits under this part, for individuals permitted to be enrolled with the organization under this part, based on any health status-related factor described in section 2702(a)(1) of the Public Health Service Act.” GoHealth otherwise denies any remaining allegations in Paragraph 89.

90. The allegations in Paragraph 90 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.110(a)(7) presently includes the language: “Except as provided in paragraph (b) of this section, an MA organization may not deny, limit, or condition the coverage or furnishing of benefits to individuals eligible to enroll in an MA plan offered by the organization on the basis of any factor that is related to health status, including, but not limited to the following...disability.” GoHealth otherwise denies any remaining allegations in Paragraph 90.

91. The allegations in Paragraph 91 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 45 § C.F.R. 92.207(a) presently includes the language: “A covered entity must not, in providing or administering health insurance coverage or other health-related coverage, discriminate on the basis of race, color, national origin, sex, age, disability, or any combination thereof.” GoHealth admits 45 §§ C.F.R. 92.207(b)(1) and (2) presently states: “A covered entity must not, in providing or administering health insurance coverage or other health-related coverage:

deny, cancel, limit or refuse to issue or renew health insurance coverage or other health-related coverage, or deny or limit coverage of a claim, or impose additional cost sharing or other limitations or restrictions on coverage, on the basis of race, color, national origin, sex, age, disability, or any combination thereof;” and “have or implement marketing practices or benefit designs that discriminate on the basis of race, color, national origin, sex, age, disability, or any combination thereof, in health insurance coverage or other health-related coverage.” GoHealth otherwise denies any remaining allegations in Paragraph 91.

5. Response to “Contractual and Claim Requirements for MAOs”

92. The allegations in Paragraph 92 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 92 and on that basis denies the allegations.

93. The allegations in Paragraph 93 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.504 presently includes the language: “The contract between the MA organization and CMS must contain the following provisions,” followed by a list. GoHealth otherwise denies any remaining allegations in Paragraph 93.

94. The allegations in Paragraph 94 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.504(h)(1) presently includes the language: “The MA organization agrees to comply with federal laws and regulations designed to prevent or ameliorate fraud, waste, and abuse, including, but not limited to, applicable provisions of Federal criminal law, the False Claims Act (31 U.S.C. 3729 et. seq) and the anti-kickback statute.” GoHealth admits 42 C.F.R. §

422.504(a)(2) presently includes the language: “That it will comply with the prohibition in § 422.110 on discrimination in beneficiary enrollment.” GoHealth otherwise denies any remaining allegations in Paragraph 94.

95. The allegations in Paragraph 95 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.504(l) presently includes the language: “As a condition for receiving a monthly payment under subpart G of this part, the MA organization agrees that its chief executive officer (CEO), chief financial officer (CFO), or an individual delegated the authority to sign on behalf of one of these officers, and who reports directly to such officer, must request payment under the contract on a document that certifies (based on best knowledge, information, and belief) the accuracy, completeness, and truthfulness of relevant data that CMS requests. Such data include specified enrollment information, encounter data, and other information that CMS may specify” GoHealth otherwise denies any remaining allegations in Paragraph 95.

96. The allegations in Paragraph 96 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth admits 42 C.F.R. § 422.504(l)(1) presently includes the language: “The CEO, CFO, or an individual delegated the authority to sign on behalf of one of these officers, and who reports directly to such officer, must certify that each enrollee for whom the organization is requesting payment is validly enrolled in an MA plan offered by the organization and the information relied upon by CMS in determining payment (based on best knowledge, information, and belief) is accurate, complete, and truthful.” GoHealth admits 42 C.F.R. § 422.504(l)(2) presently includes the language: “The CEO, CFO, or an individual delegated with the authority to sign on behalf of one of these officers, and who reports directly to such officer, must certify (based

on best knowledge, information, and belief) that the data it submits under § 422.310 are accurate, complete, and truthful.” GoHealth otherwise denies any remaining allegations in Paragraph 96.

97. The allegations in Paragraph 97 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth denies the allegations in Paragraph 97.

**IV. RESPONSE TO “KICKBACKS AND DISCRIMINATION BY THE
DEFENDANT INSURERS AND DEFENDANT BROKERS”**

98. GoHealth denies the allegations in Paragraph 98.

99. GoHealth denies the allegations in Paragraph 99.

100. GoHealth denies the allegations in Paragraph 100.

101. GoHealth denies the allegations in Paragraph 101 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 101 and on that basis denies the allegations.

102. GoHealth denies the allegations in Paragraph 102.

A. Response to “Humana”

1. Response to “Humana Paid Kickbacks to the Defendant Brokers to Steer Medicare Beneficiaries to Humana Plans and Limit Enrollments in Competitors’ Plans”

103. GoHealth denies the allegations in Paragraph 103 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 103 and on that basis denies the allegations.

104. Paragraph 104 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies that the AKS applies to Medicare Advantage plans and enrollments and GoHealth denies the allegations in Paragraph 104 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information

sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 104, and on that basis denies the allegations.

105. Paragraph 105 purports to describe and quote from a document. That document, to the extent it exists, speaks for itself. To the extent any further response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 105 and on that basis denies the allegations.

106. GoHealth denies the allegations in Paragraph 106.

107. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 107 regarding what parties other than GoHealth purportedly knew and on that basis denies the allegations. GoHealth otherwise denies the allegations in Paragraph 107.

108. GoHealth denies the allegations in Paragraph 108 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 108 and on that basis denies the allegations.

109. GoHealth denies the allegations in the first and third sentences of Paragraph 109 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first and third sentences of Paragraph 109 and on that basis denies the allegations. The second sentence of Paragraph 109 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent any further response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 109 and on that basis denies the allegations.

110. GoHealth denies the allegations in the first sentence of Paragraph 110 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 110 and on that basis denies the allegations. The second and third sentences of Paragraph 110 purport to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations to the extent they suggest that the document referenced in Paragraph 110 represents an “example” of the allegations in Paragraph 110, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second and third sentences of Paragraph 110 and on that basis denies the allegations.

111. GoHealth denies the allegations in Paragraph 111.

112. GoHealth denies the allegations in Paragraph 112.

113. GoHealth denies the allegations in Paragraph 113 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 113 and on that basis denies the allegations.

2. Response to “Humana’s Kickbacks to GoHealth”

114. GoHealth denies the allegations in Paragraph 114.

115. GoHealth denies the allegations in Paragraph 115.

116. GoHealth denies the allegations in Paragraph 116.

117. GoHealth denies the allegations in Paragraph 117.

118. GoHealth denies the allegations in Paragraph 118.

119. Paragraph 119 purports to summarize a document. That document speaks for itself.

To the extent any response is required, GoHealth admits the allegations in Paragraph 119.

120. Paragraph 120 purports to quote a document. That document speaks for itself. To the extent any response is required, GoHealth admits Paragraph 120 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 120.

121. Paragraph 121 purports to quote a document. That document speaks for itself. To the extent a response is required, GoHealth admits that Paragraph 121 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 121.

122. GoHealth denies the allegations in Paragraph 122.

123. GoHealth denies the allegations in Paragraph 123.

124. GoHealth denies the allegations in Paragraph 124.

125. GoHealth denies the last sentence in Paragraph 125. The remainder of Paragraph 125 purports to describe and quote a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 125 and on that basis denies the allegations.

126. GoHealth denies the allegations in Paragraph 126.

127. Paragraph 127 purports to quote a document. That document speaks for itself. To the extent a response is required, GoHealth admits Mr. Uchytel signed Amendment 20 to the Marketing and Distribution Agreement on March 9, 2021⁶ and that Paragraph 127 contains quotations from portions of that contract. GoHealth otherwise denies the allegations in Paragraph 127.

128. GoHealth denies the allegations in Paragraph 128.

129. GoHealth denies the first sentence of Paragraph 129. The second sentence of Paragraph 129 purports to quote a document. The document speaks for itself. To the extent a

response is required, GoHealth admits Paragraph 129 contains quotations from portions of the referenced document. GoHealth otherwise denies the remaining allegations in Paragraph 129.

130. GoHealth denies the allegations in Paragraph 130.

131. GoHealth denies the allegations in the first sentence of Paragraph 131. Paragraph 131 otherwise purports to summarize and quote from documents. The documents speak for themselves. To the extent a response is required, GoHealth denies the remaining allegations in Paragraph 131.

132. Paragraph 132 purports to quote from documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 132 and on that basis denies the allegations.

133. Paragraph 133 purports to describe and quote documents. These documents speak for themselves. To the extent a response is required, GoHealth admits that it sent Humana an invoice and that GoHealth and Humana executed a contract amendment in September 2016. GoHealth admits that Paragraph 133 contains quotations from portions of the referenced invoice and contract. GoHealth otherwise denies the remaining allegations in Paragraph 133.

134. GoHealth denies the allegations in Paragraph 134.

135. GoHealth denies the allegations in Paragraph 135.

136. GoHealth denies the allegations in Paragraph 136.

137. Paragraph 137 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 137 to the extent they suggest that the document referenced in Paragraph 137 represents an “example” of the allegations in Paragraph 136, which GoHealth denies. GoHealth otherwise lacks

knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 137 and on that basis denies the allegations.

138. Paragraph 138 purports to quote documents. The documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 138 and on that basis denies the allegations.

139. GoHealth denies the allegations in Paragraph 139.

140. Paragraph 140 purports to describe and quote documents. These documents speak for themselves. To the extent a response is required, GoHealth admits the allegations in the first sentence. GoHealth admits Paragraph 140 contains quotations from portions of the September 2017 Agreement. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 140 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 140.

141. GoHealth denies the allegations in Paragraph 141.

142. Paragraph 142 purports to describe and quote documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 142 contains quotations from portions of the document referenced in the first sentence. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 142 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 142.

143. Paragraph 143 purports to describe and quote a document. The document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 143.

144. Paragraph 144 purports to describe documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth denies the allegations in Paragraph 144 to the extent they characterize any purported agreement. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 144 and on that basis denies the allegations.

145. Paragraph 145 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations to the extent they characterize any purported agreement. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity the allegations in Paragraph 145 and on that basis denies the allegations.

146. GoHealth denies the allegations in Paragraph 146.

147. Paragraph 147 purports to describe a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 147 to the extent they suggest that the document referenced in Paragraph 147 represents an “example” of the allegations in Paragraph 146, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 147 and on that basis denies the allegations.

148. GoHealth denies the first and fourth sentences of Paragraph 148. The remainder of Paragraph 148 purports to describe and quote documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth denies the remaining

allegations to the extent they suggest that the documents described in Paragraph 148 represent an “example” of the allegations in Paragraph 148, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 148 and on that basis denies the allegations.

149. GoHealth denies the allegations in Paragraph 149.

150. GoHealth denies the allegations in Paragraph 150.

151. GoHealth denies the allegations in Paragraph 151.

152. Paragraph 152 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 152 and on that basis denies the allegations.

153. GoHealth denies the allegations in Paragraph 153.

154. Paragraph 154 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first sentence of Paragraph 154 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 154.

155. GoHealth denies the allegations in Paragraph 155.

156. GoHealth denies the allegations in Paragraph 156.

157. Paragraph 157 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 157 regarding

what Ms. Reece told Mr. Uchytel and on that basis denies the allegations. GoHealth otherwise denies the allegations in Paragraph 157.

158. GoHealth denies the allegations in Paragraph 158.

159. Paragraph 159 purports to quote a document. This document speaks for itself. To the extent a response is required, GoHealth admits that Paragraph 159 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 159.

160. GoHealth denies the allegations in the first sentence in Paragraph 160. The remainder of Paragraph 160 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the remaining allegations to the extent they suggest that the document referenced in Paragraph 160 represents an “example” of the allegations in Paragraph 160, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 160 and on that basis denies the allegations.

161. GoHealth denies the first sentence of Paragraph 161. The remainder of Paragraph 161 purports to describe and excerpt a document. This document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 161 contains a screenshot of a portion of the referenced document. GoHealth otherwise denies the allegations in Paragraph 161.

162. GoHealth denies the allegations first sentence of Paragraph 162. The remainder of Paragraph 162 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 162 and on that basis denies the allegations.

163. Paragraph 163 purports to describe a document. This document speaks for itself. To the extent a response is required, GoHealth admits it entered into a contract with Humana on November 21, 2019. GoHealth otherwise denies the remaining allegations in Paragraph 163.

164. GoHealth denies the allegations in Paragraph 164.

165. GoHealth denies the allegations in the first sentence of Paragraph 165. The remainder of Paragraph 165 purports to describe and quote a document. This document speaks for itself. To the extent a response is required, GoHealth admits that the remainder of Paragraph 165 contains quotations from portions of the referenced document. GoHealth otherwise denies the remaining allegations in Paragraph 165.

166. Paragraph 166 purports to quote documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 166 contains quotations from portions of the invoice dated November 20, 2019. GoHealth otherwise denies the remaining allegations in Paragraph 166.

167. GoHealth denies the allegations in Paragraph 167.

168. GoHealth denies the first sentence of Paragraph 168. The remainder of Paragraph 168 purports to quote a document. The document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 168 and on that basis denies the allegations.

169. Paragraph 169 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 169 and on that basis denies the allegations.

170. GoHealth denies that the “AKS applied to such conduct.” GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of allegations in the first sentence of Paragraph 170 and on that basis denies the allegations. The remainder of Paragraph 170 purports to quote a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the remaining allegations to the extent they suggest that the document referenced in Paragraph 170 represents an “example” of the allegations in Paragraph 170, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 170 and on that basis denies the allegations.

171. GoHealth denies the allegations in the first and last sentences of Paragraph 171. The remainder of Paragraph 171 purports to describe a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the remaining allegations to the extent they suggest that the document referenced in Paragraph 171 represents an “example” of the allegations in Paragraph 171, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the remainder of Paragraph 171 and on that basis denies the allegations.

172. Paragraph 172 purports to describe two documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 172 contains a screenshot of a portion of the referenced document. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first sentence in Paragraph 172 and on that basis denies the allegations. GoHealth otherwise denies any remaining allegations in Paragraph 172.

173. GoHealth denies the allegations in Paragraph 173.

174. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 174 regarding what parties other than GoHealth purportedly understood and on that basis denies the allegations. GoHealth otherwise denies the allegations in Paragraph 174.

175. Paragraph 175 purports to describe a document. This document speaks for itself. To the extent a response is required, GoHealth admits Humana signed a contract amendment on June 27, 2020 and that Paragraph 175 contains quotations from portions of it. GoHealth otherwise denies the allegations in Paragraph 175.

176. GoHealth admits it became a public company on July 15, 2020 and denies the remaining allegations in the first sentence. The remainder of Paragraph 176 quotes from documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 176 and on that basis denies the allegations.

177. The first sentence of Paragraph 177 purports to describe a document that speaks for itself, to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first sentence of Paragraph 177 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 177.

178. GoHealth denies the allegations in Paragraph 178.

179. GoHealth denies the allegations in Paragraph 179.

180. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 180 and on that basis denies the allegations.

181. GoHealth denies the allegations in Paragraph 181.

182. GoHealth denies the allegations in Paragraph 182.

183. Paragraph 183 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 183 and on that basis denies the allegations.

184. GoHealth denies the allegations in Paragraph 184.

185. Paragraph 185 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 185 and on that basis denies the allegations.

186. GoHealth denies the allegations in Paragraph 186.

187. GoHealth denies the allegations in Paragraph 187.

188. GoHealth denies the allegations in the first sentence of Paragraph 188. The remainder of Paragraph 188 purports to describe a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the remainder of Paragraph 188 and on that basis denies the allegations.

189. Paragraph 189 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 189 and on that basis denies the allegations.

190. Paragraph 190 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 190 and on that basis denies the allegations.

191. GoHealth denies the allegations in Paragraph 191.

192. GoHealth denies the allegations in Paragraph 192.

193. GoHealth denies the allegations in Paragraph 193.

194. Paragraph 194 purports to describe a document. That document speaks for itself. To the extent a response is required, GoHealth admits Humana signed a contract on December 3, 2021. GoHealth otherwise denies the allegations in Paragraph 194.

195. GoHealth denies the allegations to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 195 and on that basis denies the allegations.

196. Paragraph 196 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 196 and on that basis denies the allegations.

197. Paragraph 197 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 197 and on that basis denies the allegations.

3. Response to “Humana’s Kickbacks to SelectQuote”

198. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 198 and on that basis denies the allegations.

199. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 199 and on that basis denies the allegations.

200. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 200 and on that basis denies the allegations.

201. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 201 and on that basis denies the allegations.

202. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 202 and on that basis denies the allegations.

203. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 203 and on that basis denies the allegations.

204. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 204 and on that basis denies the allegations.

205. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 205 and on that basis denies the allegations.

206. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 206 and on that basis denies the allegations.

207. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 207 and on that basis denies the allegations.

208. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 208 and on that basis denies the allegations.

209. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 209 and on that basis denies the allegations.

210. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 210 and on that basis denies the allegations.

211. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 211 and on that basis denies the allegations.

212. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 212 and on that basis denies the allegations.

213. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 213 and on that basis denies the allegations.

214. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 214 and on that basis denies the allegations.

215. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 215 and on that basis denies the allegations.

216. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 216 and on that basis denies the allegations.

217. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 217 and on that basis denies the allegations.

218. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 218 and on that basis denies the allegations.

219. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 219 and on that basis denies the allegations.

220. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 220 and on that basis denies the allegations.

221. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 221 and on that basis denies the allegations.

222. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 222 and on that basis denies the allegations.

223. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 223 and on that basis denies the allegations.

224. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 224 and on that basis denies the allegations.

225. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 225 and on that basis denies the allegations.

226. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 226 and on that basis denies the allegations.

227. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 227 and on that basis denies the allegations.

228. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 228 and on that basis denies the allegations.

229. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 229 and on that basis denies the allegations.

230. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 230 and on that basis denies the allegations.

231. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 231 and on that basis denies the allegations.

232. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 232 and on that basis denies the allegations.

233. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 233 and on that basis denies the allegations.

234. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 234 and on that basis denies the allegations.

235. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 235 and on that basis denies the allegations.

236. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 236 and on that basis denies the allegations.

237. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 237 and on that basis denies the allegations.

238. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 238 and on that basis denies the allegations.

239. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 239 and on that basis denies the allegations.

240. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 240 and on that basis denies the allegations.

241. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 241 and on that basis denies the allegations.

242. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 242 and on that basis denies the allegations.

243. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 243 and on that basis denies the allegations.

244. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 244 and on that basis denies the allegations.

245. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 245 and on that basis denies the allegations.

246. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 246 and on that basis denies the allegations.

247. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 247 and on that basis denies the allegations.

248. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 248 and on that basis denies the allegations.

249. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 249 and on that basis denies the allegations.

250. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 250 and on that basis denies the allegations.

251. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 251 and on that basis denies the allegations.

252. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 252 and on that basis denies the allegations.

253. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 253 and on that basis denies the allegations.

254. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 254 and on that basis denies the allegations.

255. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 255 and on that basis denies the allegations.

256. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 256 and on that basis denies the allegations.

4. Response to “Humana’s Kickbacks to eHealth”

257. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 257 and on that basis denies the allegations.

258. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 258 and on that basis denies the allegations.

259. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 259 and on that basis denies the allegations.

260. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 260 and on that basis denies the allegations.

261. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 261 and on that basis denies the allegations.

262. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 262 and on that basis denies the allegations.

263. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 263 and on that basis denies the allegations.

264. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 264 and on that basis denies the allegations.

265. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 265 and on that basis denies the allegations.

266. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 266 and on that basis denies the allegations.

267. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 267 and on that basis denies the allegations.

268. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 268 and on that basis denies the allegations.

269. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 269 and on that basis denies the allegations.

270. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 270 and on that basis denies the allegations.

271. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 271 and on that basis denies the allegations.

272. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 272 and on that basis denies the allegations.

273. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 273 and on that basis denies the allegations.

274. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 274 and on that basis denies the allegations.

275. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 275 and on that basis denies the allegations.

276. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 276 and on that basis denies the allegations.

277. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 277 and on that basis denies the allegations.

278. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 278 and on that basis denies the allegations.

279. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 279 and on that basis denies the allegations.

280. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 280 and on that basis denies the allegations.

281. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 281 and on that basis denies the allegations.

282. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 282 and on that basis denies the allegations.

283. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 283 and on that basis denies the allegations.

284. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 284 and on that basis denies the allegations.

285. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 285 and on that basis denies the allegations.

286. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 286 and on that basis denies the allegations.

287. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 287 and on that basis denies the allegations.

288. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 288 and on that basis denies the allegations.

289. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 289 and on that basis denies the allegations.

290. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 290 and on that basis denies the allegations.

291. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 291 and on that basis denies the allegations.

292. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 292 and on that basis denies the allegations.

293. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 293 and on that basis denies the allegations.

294. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 294 and on that basis denies the allegations.

295. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 295 and on that basis denies the allegations.

296. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 296 and on that basis denies the allegations.

297. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 297 and on that basis denies the allegations.

298. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 298 and on that basis denies the allegations.

299. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 299 and on that basis denies the allegations.

300. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 300 and on that basis denies the allegations.

301. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 301 and on that basis denies the allegations.

302. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 302 and on that basis denies the allegations.

303. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 303 and on that basis denies the allegations.

304. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 304 and on that basis denies the allegations.

5. Response to “Humana Conspired with the Defendant Brokers and Others to Discriminate Against Medicare Beneficiaries with Disabilities”

305. GoHealth denies the allegations in Paragraph 305.

306. GoHealth denies the allegations in Paragraph 306.

307. GoHealth denies the allegations in Paragraph 307.

308. GoHealth denies the allegations in Paragraph 308 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 308 and on that basis denies the allegations.

309. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 309 and on that basis denies the allegations.

310. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 310 and on that basis denies the allegations.

311. Paragraph 311 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 311 and on that basis denies the allegations.

312. Paragraph 312 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 312 and on that basis denies the allegations.

313. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first sentence of Paragraph 313 and on that basis denies the allegations. GoHealth otherwise denies the allegations in the second sentence of Paragraph 313.

i. Response to “Humana and the Defendant Brokers Knew it Was Illegal to Discriminate Against Medicare Beneficiaries with Disabilities”

314. GoHealth denies the allegation in Paragraph 314.

315. Paragraph 315 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 315 and on that basis denies the allegations.

316. Paragraph 316 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or

information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 316 and on that basis denies the allegations.

ii. Response to “Humana Pressured the Defendant Brokers and Others to Limit Enrollment of Beneficiaries with Disabilities”

317. GoHealth denies the allegations in Paragraph 317 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 317 and on that basis denies the allegations.

318. GoHealth denies the allegations in Paragraph 318 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 318 and on that basis denies the allegations.

319. Paragraph 319 purports to describe documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 319 and on that basis denies the allegations.

320. Paragraph 320 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 320 and on that basis denies the allegations.

321. Paragraph 321 purports to describe testimony. That testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 321 and on that basis denies the allegations.

322. Paragraph 322 purports to describe testimony. That testimony that speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form

a belief about the truth or falsity of the allegations in Paragraph 322 and on that basis denies the allegations.

323. GoHealth denies the allegations in Paragraph 323 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 323 and on that basis denies the allegations.

324. Paragraph 324 purports to quote a document that speaks for itself, to which no response is required. To the extent a response is required, GoHealth denies the allegations in Paragraph 324 to the extent they suggest that the document referenced in Paragraph 324 represents an “example” of the allegations in Paragraph 323, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 324 and on that basis denies the allegations.

325. Paragraph 325 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 325 to the extent they suggest that “unlawful” conduct occurred. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 325 and on that basis denies the allegations.

326. Paragraph 326 purports to quote a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 326 and on that basis denies the allegations.

327. Paragraph 327 purports to describe a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or

information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 327 and on that basis denies the allegations.

328. GoHealth denies the allegations in Paragraph 328 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 328 and on that basis denies the allegations.

329. GoHealth denies the allegations in Paragraph 329.

330. GoHealth denies the allegations to the extent they suggest that the document referenced in Paragraph 330 is “similar” to the allegations in the preceding paragraphs, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 330 and on that basis denies the allegations.

331. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 331 and on that basis denies the allegations.

332. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 332 and on that basis denies the allegations.

333. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 333 and on that basis denies the allegations.

334. Paragraph 334 purports to describe testimony. That testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 334 and on that basis denies the allegations.

335. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 335 and on that basis denies the allegations.

336. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 336 and on that basis denies the allegations.

337. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 337 and on that basis denies the allegations.

338. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 338 and on that basis denies the allegations.

iii. Response to “At Humana’s Behest, the Defendant Brokers and Others Limited Enrollment of Disabled Beneficiaries in Humana Plans”

339. GoHealth denies the allegations in Paragraph 339.

340. GoHealth denies the allegations in Paragraph 340.

341. Paragraph 341 purports to quote a document. That document speaks for itself. To the extent a response is required, GoHealth admits that Paragraph 341 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 341.

342. GoHealth denies the allegations in Paragraph 342.

343. Paragraph 343 purports to describe and quote a document. That document speaks for itself. To the extent a response is required, GoHealth admits that Paragraph 343 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 343.

344. Paragraph 344 purports to describe and quote a document. That document speaks for itself. To the extent a response is required, GoHealth admits that Paragraph 344 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 343.

345. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 345 and on that basis denies the allegations.

346. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 346 and on that basis denies the allegations.

347. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 347 and on that basis denies the allegations.

348. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 348 and on that basis denies the allegations.

349. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 349 and on that basis denies the allegations.

350. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 350 and on that basis denies the allegations.

351. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 351 and on that basis denies the allegations.

352. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 352 and on that basis denies the allegations.

353. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 353 and on that basis denies the allegations.

354. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 354 and on that basis denies the allegations.

355. GoHealth denies the allegations in Paragraph 355 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of allegations in Paragraph 355 and on that basis denies the allegations.

356. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 356 and on that basis denies the allegations.

357. GoHealth denies the allegations in Paragraph 357 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 357 and on that basis denies the allegations.

iv. Response to “Humana and the Defendant Brokers Were Successful in Their Scheme to Limit Enrollment of Beneficiaries with Disabilities”

358. GoHealth denies the allegation in Paragraph 358.

359. Paragraph 359 purports to quote a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 359 to the extent they suggest that the document referenced in Paragraph 359 represents an “example” of the allegations in Paragraph 358, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 359 and on that basis denies the allegations.

360. GoHealth denies the first sentence in Paragraph 360. The remainder of Paragraph 360 purports to describe and quote a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 360 contains quotations from portions of the referenced document. GoHealth otherwise denies the remaining allegations in Paragraph 360.

361. GoHealth denies the allegations in the first sentence of Paragraph 361. The remainder of Paragraph 361 purports to describe and quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the remaining sentences of Paragraph 361 and on that basis denies the allegations.

362. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 362 and on that basis denies the allegations.

363. Paragraph 363 purports to describe a document. That document speaks for itself. To the extent a response is required, GoHealth admits Mr. Chinigo sent Mr. Gudmundsen and Mr. Owens an email on March 12, 2018. GoHealth otherwise denies the remaining allegations in Paragraph 363.

364. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 364 and on that basis denies the allegations.

365. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 365 and on that basis denies the allegations.

366. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 366 and on that basis denies the allegations.

367. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 367 and on that basis denies the allegations.

368. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 368 and on that basis denies the allegations.

369. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 369 and on that basis denies the allegations.

370. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 370 and on that basis denies the allegations.

371. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 371 and on that basis denies the allegations.

372. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 372 and on that basis denies the allegations.

373. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 373 and on that basis denies the allegations.

374. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 374 and on that basis denies the allegations.

375. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 375 and on that basis denies the allegations.

376. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 376 and on that basis denies the allegations.

377. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 377 and on that basis denies the allegations.

B. Response to “Aetna”

1. Response to “Aetna Paid Kickbacks to the Defendant Brokers to Steer Medicare Beneficiaries to Aetna Plans and Limit Enrollments in Competitor’s Plans”

378. GoHealth denies the allegations in Paragraph 378.

379. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first and second sentences of Paragraph 379 and on that basis denies the allegations. GoHealth otherwise denies the allegations in the third sentence of Paragraph 379.

380. GoHealth denies the allegations in Paragraph 380.

381. GoHealth denies the first sentence of Paragraph 381. The second sentence of Paragraph 381 purports to describe and quote a document that speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about

the truth or falsity of the allegations in the second sentence of Paragraph 381 and on that basis denies the allegations.

382. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first sentence of Paragraph 382 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 382.

383. GoHealth denies that the AKS applies to Medicare Advantage plans and enrollments. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of any remaining allegations in Paragraph 383 and on that basis denies the allegations.

384. GoHealth denies the allegations in Paragraph 384 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 384 and on that basis denies the allegations.

385. GoHealth denies the allegations in the first and second sentences of Paragraph 385. The third and fourth sentences in Paragraph 385 purport to describe and quote from a document and testimony. These materials, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth denies the allegations in the third and fourth sentences of Paragraph 385 to the extent they suggest that the document and testimony referenced in Paragraph 385 represent an “example” of the allegations in Paragraph 385, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the third and fourth sentences of Paragraph 385 and on that basis denies the allegations. GoHealth denies the remaining allegations in Paragraph 385.

386. GoHealth denies the allegations in the first sentence of Paragraph 386. The remainder of Paragraph 386 purports to quote testimony. That testimony speaks for itself. To the

extent a response is required, GoHealth denies the allegations in Paragraph 386 to the extent they suggest that “the pay-for-performance model was at least in part driven by” GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the remainder of Paragraph 386 and on that basis denies the allegations.

2. Response to “Aetna’s Kickbacks to eHealth”

387. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 387 and on that basis denies the allegations.

388. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 388 and on that basis denies the allegations.

389. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 389 and on that basis denies the allegations.

390. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 390 and on that basis denies the allegations.

391. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 391 and on that basis denies the allegations.

392. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 392 and on that basis denies the allegations.

393. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 393 and on that basis denies the allegations.

394. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 394 and on that basis denies the allegations.

395. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 395 and on that basis denies the allegations.

396. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 396 and on that basis denies the allegations.

397. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 397 and on that basis denies the allegations.

398. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 398 and on that basis denies the allegations.

399. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 399 and on that basis denies the allegations.

400. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 400 and on that basis denies the allegations.

401. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 401 and on that basis denies the allegations.

402. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 402 and on that basis denies the allegations.

403. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 403 and on that basis denies the allegations.

404. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 404 and on that basis denies the allegations.

405. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 405 and on that basis denies the allegations.

406. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 406 and on that basis denies the allegations.

407. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 407 and on that basis denies the allegations.

408. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 408 and on that basis denies the allegations.

409. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 409 and on that basis denies the allegations.

410. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 410 and on that basis denies the allegations.

411. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 411 and on that basis denies the allegations.

412. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 412 and on that basis denies the allegations.

413. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 413 and on that basis denies the allegations.

414. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 414 and on that basis denies the allegations.

415. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 415 and on that basis denies the allegations.

416. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 416 and on that basis denies the allegations.

417. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 417 and on that basis denies the allegations.

418. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 418 and on that basis denies the allegations.

419. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 419 and on that basis denies the allegations.

420. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 420 and on that basis denies the allegations.

3. Response to “Aetna’s Kickbacks to SelectQuote

421. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 421 and on that basis denies the allegations.

422. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 422 and on that basis denies the allegations.

423. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 423 and on that basis denies the allegations.

424. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 424 and on that basis denies the allegations.

425. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 425 and on that basis denies the allegations.

426. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 426 and on that basis denies the allegations.

427. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 427 and on that basis denies the allegations.

428. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 428 and on that basis denies the allegations.

429. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 429 and on that basis denies the allegations.

430. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 430 and on that basis denies the allegations.

431. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 431 and on that basis denies the allegations.

432. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 432 and on that basis denies the allegations.

433. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 433 and on that basis denies the allegations.

434. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 434 and on that basis denies the allegations.

435. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 435 and on that basis denies the allegations.

436. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 436 and on that basis denies the allegations.

437. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 437 and on that basis denies the allegations.

438. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 438 and on that basis denies the allegations.

439. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 439 and on that basis denies the allegations.

440. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 440 and on that basis denies the allegations.

441. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 441 and on that basis denies the allegations.

442. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 442 and on that basis denies the allegations.

443. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 443 and on that basis denies the allegations.

444. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 444 and on that basis denies the allegations.

445. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 445 and on that basis denies the allegations.

446. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 446 and on that basis denies the allegations.

447. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 447 and on that basis denies the allegations.

448. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 448 and on that basis denies the allegations.

449. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 449 and on that basis denies the allegations.

450. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 450 and on that basis denies the allegations.

451. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 451 and on that basis denies the allegations.

452. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 452 and on that basis denies the allegations.

453. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 453 and on that basis denies the allegations.

454. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 454 and on that basis denies the allegations.

455. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 455 and on that basis denies the allegations.

456. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 456 and on that basis denies the allegations.

457. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 457 and on that basis denies the allegations.

4. Response to “Aetna’s Kickbacks to GoHealth”

458. GoHealth denies the allegations in Paragraph 458.

459. GoHealth denies the allegations in Paragraph 459.

460. GoHealth denies the allegations in the first sentence of Paragraph 460. The second sentence of Paragraph 460 purports to summarize and quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 460 and on that basis denies the allegations. GoHealth admits it

entered into an agreement with Aetna on October 20, 2020. GoHealth otherwise denies the remaining allegations in Paragraph 460.

461. Paragraph 461 purports to quote from documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 461 contains quotations from portions of the October 2020 Marketing Services Agreement. GoHealth otherwise denies the remaining allegations in Paragraph 461.

462. GoHealth denies the allegations in Paragraph 462.

463. GoHealth denies the allegations in Paragraph 463.

464. GoHealth denies the allegations in Paragraph 464.

465. GoHealth denies the allegations in Paragraph 465.

466. GoHealth denies the allegations in the first sentence of Paragraph 466. The second sentence of Paragraph 466 purports to quote from and summarize testimony. That testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 466 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 466.

467. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first sentence of Paragraph 467 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 467.

5. Response to “Aetna’s “Bonuses,” “Rewards,” and “Kickers””

468. GoHealth denies the allegations in Paragraph 468.

469. Paragraph 469 purports to quote a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, except GoHealth denies the allegations in

Paragraph 469 to the extent they suggest that the document referenced in Paragraph 469 represents an “example” of the allegations in Paragraph 468, which GoHealth denies. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 469 and on that basis denies the allegations.

470. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 470 and on that basis denies the allegations.

471. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 471 and on that basis denies the allegations.

472. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 472 and on that basis denies the allegations.

473. Paragraph 473 purports to quote from testimony. That testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 473 and on that basis denies the allegations.

474. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 474 and on that basis denies the allegations.

475. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 475 and on that basis denies the allegations.

476. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 476 and on that basis denies the allegations.

477. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 477 and on that basis denies the allegations.

478. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 478 and on that basis denies the allegations.

479. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 479 and on that basis denies the allegations.

480. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 480 and on that basis denies the allegations.

481. Paragraph 481 purports to quote from and summarize documents and testimony. These materials speak for themselves. To the extent a response is required, GoHealth denies the allegations in the last sentence of Paragraph 481 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 480 and on that basis denies the allegations.

482. Paragraph 482 purports to summarize testimony. This testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 482 and on that basis denies the allegations.

483. Paragraph 483 purports to summarize testimony. This testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 483 and on that basis denies the allegations.

6. Response to “Aetna Conspired with the Defendant Brokers and Others to Discriminate Against Medicare Beneficiaries with Disabilities”

484. GoHealth denies the allegations in Paragraph 484.

485. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 485 and on that basis denies the allegations.

486. GoHealth denies the allegations in the last sentence of Paragraph 486. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 486 and on that basis denies the allegations.

487. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 487 and on that basis denies the allegations.

488. GoHealth denies the allegations in the first two sentences of Paragraph 488. The third sentence of Paragraph 488 purports to summarize testimony. That testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the third sentence of Paragraph 488 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 488.

489. GoHealth denies the allegations in Paragraph 489 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 489 and on that basis denies the allegations.

490. GoHealth denies the allegations in the first sentence of Paragraph 490. The second sentence of Paragraph 490 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 490 and on that basis denies the allegations.

i. Response to “Aetna and the Defendant Brokers Knew it Was Illegal to Discriminate Against Medicare Beneficiaries with Disabilities”

491. GoHealth denies the allegations in Paragraph 491.

492. Paragraph 492 purports to quote from documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 492 and on that basis denies the allegations.

493. GoHealth denies “unlawful” conduct occurred. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 493 and on that basis denies the allegations.

494. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 494 and on that basis denies the allegations.

495. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 495 and on that basis denies the allegations.

ii. Response to “Aetna Pressured the Defendant Brokers and Others to Limit Enrollment of Beneficiaries with Disabilities”

496. GoHealth denies that it “reduced the proportion of disabled beneficiaries [it] enrolled in Aetna Medicare Advantage plans.” GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 496 and on that basis denies the allegations.

497. Paragraph 497 purports to summarize and quote from documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth denies the allegations in Paragraph 497 to the extent they suggest that the document referenced in Paragraph 497 represents an “example” of the allegations in Paragraph 496, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 497 and on that basis denies the allegations.

498. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 498 and on that basis denies the allegations.

499. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 499 and on that basis denies the allegations.

500. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 500 and on that basis denies the allegations.

501. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 501 and on that basis denies the allegations.

502. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 502 and on that basis denies the allegations.

503. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 503 and on that basis denies the allegations.

504. GoHealth denies the allegations in the first sentence in Paragraph 504. The second and third sentences in Paragraph 504 purport to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second and third sentences in Paragraph 504 and on that basis denies the allegations.

iii. Response to “At Aetna’s Behest, the Defendant Brokers and Others Limited Enrollment of Disabled Beneficiaries in Aetna Plans”

505. GoHealth denies the allegations in Paragraph 505 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 505 and on that basis denies the allegations.

506. Paragraph 506 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 506 to the extent they suggest that the document referenced in Paragraph 506 represents an “example” of the allegations in Paragraph 505, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 506 and on that basis denies the allegations.

507. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 507 and on that basis denies the allegations.

508. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 508 and on that basis denies the allegations.

509. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 509 and on that basis denies the allegations.

510. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 510 and on that basis denies the allegations.

511. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 511 and on that basis denies the allegations.

512. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 512 and on that basis denies the allegations.

513. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 513 and on that basis denies the allegations.

514. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 514 and on that basis denies the allegations.

515. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 515 and on that basis denies the allegations.

516. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 516 and on that basis denies the allegations.

517. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 517 and on that basis denies the allegations.

518. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 518 and on that basis denies the allegations.

519. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 519 and on that basis denies the allegations.

520. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 520 and on that basis denies the allegations.

521. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 521 and on that basis denies the allegations.

522. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 522 and on that basis denies the allegations.

523. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 523 and on that basis denies the allegations.

524. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 524 and on that basis denies the allegations.

525. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 525 and on that basis denies the allegations.

526. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 526 and on that basis denies the allegations.

527. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 527 and on that basis denies the allegations.

528. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 528 and on that basis denies the allegations.

529. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 529 and on that basis denies the allegations.

530. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 530 and on that basis denies the allegations.

531. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 531 and on that basis denies the allegations.

532. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 532 and on that basis denies the allegations.

533. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 533 and on that basis denies the allegations.

534. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 534 and on that basis denies the allegations.

535. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 535 and on that basis denies the allegations.

536. lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 536 and on that basis denies the allegations.

537. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 537 and on that basis denies the allegations.

538. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 538 and on that basis denies the allegations.

539. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 539 and on that basis denies the allegations.

540. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 540 and on that basis denies the allegations.

541. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 541 and on that basis denies the allegations.

542. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 542 and on that basis denies the allegations.

543. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 543 and on that basis denies the allegations.

544. Paragraph 544 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in the first sentence of Paragraph 544 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 544 and on that basis denies the allegations.

545. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 545 and on that basis denies the allegations.

546. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 546 and on that basis denies the allegations.

547. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 547 and on that basis denies the allegations.

548. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 548 and on that basis denies the allegations.

549. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 549 and on that basis denies the allegations.

550. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 550 and on that basis denies the allegations.

551. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 551 and on that basis denies the allegations.

552. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 552 and on that basis denies the allegations.

553. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 553 and on that basis denies the allegations.

554. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 554 and on that basis denies the allegations.

555. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 555 and on that basis denies the allegations.

556. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 556 and on that basis denies the allegations.

557. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 557 and on that basis denies the allegations.

558. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 558 and on that basis denies the allegations.

559. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 559 and on that basis denies the allegations.

560. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 560 and on that basis denies the allegations.

561. Paragraph 561 purports to quote testimony. That testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 561 and on that basis denies the allegations.

562. GoHealth denies the first sentence of Paragraph 562. The remainder of Paragraph 562 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the remaining allegations to the extent they suggest that the document referenced in Paragraph 562 represents an “example” of the allegations in Paragraph 562, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 562 and on that basis denies the allegations.

563. Paragraph 563 purports to describe and quote the terms of a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 563 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 563.

564. GoHealth denies the allegations in the first sentence of Paragraph 564. The second and third sentences in Paragraph 564 purport to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge

or information sufficient to form a belief about the truth or falsity of the allegations in the second and third sentences of Paragraph 564 and on that basis denies the allegations. GoHealth otherwise denies any remaining allegations in Paragraph 564.

565. Paragraph 565 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 565 and on that basis denies the allegations.

566. GoHealth denies the allegations in the first sentence of Paragraph 566 to the extent the allegations relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 566 and on that basis denies the allegations.

567. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 567 and on that basis denies the allegations.

568. Paragraph 568 purports to characterize testimony. That testimony speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 568 and on that basis denies the allegations.

569. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 569 and on that basis denies the allegations.

570. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 570 and on that basis denies the allegations.

571. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 571 and on that basis denies the allegations.

572. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 572 and on that basis denies the allegations.

iv. Response to “Aetna was Successful in its Scheme to Limit Enrollment of Beneficiaries with Disabilities”

573. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 573 and on that basis denies the allegations.

574. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 574 and on that basis denies the allegations.

575. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 575 and on that basis denies the allegations.

576. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 576 and on that basis denies the allegations.

577. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 577 and on that basis denies the allegations.

C. Response to “Anthem”

1. Response to “Anthem Paid Kickbacks to GoHealth and eHealth to Steer Medicare Beneficiaries to Aetna Plans [sic] and Limit Enrollments in Competitors’ Plans”

578. GoHealth denies the allegations in Paragraph 578.

579. GoHealth denies the allegations in Paragraph 579 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 579 and on that basis denies the allegations.

580. GoHealth denies the allegations in Paragraph 580 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 580 and on that basis denies the allegations.

581. GoHealth denies the allegations in Paragraph 581 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 581 and on that basis denies the allegations.

582. GoHealth denies the allegations in Paragraph 582 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 582 and on that basis denies the allegations.

583. GoHealth denies the allegations in Paragraph 583 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 583 and on that basis denies the allegations.

2. Response to “Anthem’s Kickbacks to GoHealth”

584. GoHealth denies the allegations in Paragraph 584.

585. GoHealth denies the allegations in the first sentence in Paragraph 585. The second sentence in Paragraph 585 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second sentence in Paragraph 585 and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 585.

586. GoHealth denies the allegations in Paragraph 586.

587. GoHealth admits it advertises on television, online, and through mailers. GoHealth otherwise denies the remaining allegations in Paragraph 587.

588. GoHealth admits it contracted with downline agencies, which were at times referred to as Virtual Marketing Organizations (“VMOs”), and that it had a program called “MaaS” (marketplace as a service). GoHealth otherwise denies the remaining allegations in Paragraph 588.

589. GoHealth denies the allegations in Paragraph 589.

590. GoHealth denies the allegations in Paragraph 590.

591. GoHealth denies the allegations in Paragraph 591.

592. GoHealth denies the allegations in Paragraph 592.

593. Paragraph 593 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 593 to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 593 and on that basis denies the allegations.

594. GoHealth denies the allegations in Paragraph 594.

595. Paragraph 595 purports to quote from and summarize documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 595 contains quotations from portions of the referenced documents. GoHealth otherwise denies allegations in Paragraph 595.

596. GoHealth denies the allegations in Paragraph 596.

597. GoHealth denies the allegations in Paragraph 597.

598. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first two sentences in Paragraph 598 and on that basis denies the allegations. The third sentence in Paragraph 598 purports to quote from and summarize a document. That document speaks for itself. To the extent a response is required, GoHealth admits the third sentence of Paragraph 598 contains quotations from portions of the referenced document. GoHealth otherwise denies the remaining allegations in Paragraph 598.

599. GoHealth denies the allegations in Paragraph 599.

600. Paragraph 602 purports to quote from and summarize documents. These documents speak for themselves. To the extent a response is required, GoHealth admits that Paragraph 600 contains quotations from portions of the referenced documents. GoHealth otherwise denies the allegations in Paragraph 600.

601. GoHealth denies the allegations in Paragraph 601.

602. Paragraph 602 purports to quote from and summarize documents. These documents speak for themselves. To the extent a response is required, GoHealth admits that Paragraph 602 contains quotations from portions of the referenced documents. GoHealth otherwise denies the allegations in Paragraph 602.

603. GoHealth denies the allegations in Paragraph 603.

604. Paragraph 604 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 604 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 604.

605. GoHealth denies the first and second sentence of Paragraph 605. The remainder of Paragraph 605 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 605 contains quotations from portions of the quote document. GoHealth otherwise denies the remaining allegations in Paragraph 605.

606. Paragraph 606 purports to quote from and summarize a document that speaks for itself. GoHealth admits it sent Anthem an invoice on May 1, 2018, which Anthem paid. GoHealth otherwise denies the remaining allegations in Paragraph 606.

607. GoHealth denies the allegations in Paragraph 607.

608. GoHealth denies the allegations in Paragraph 608.

609. GoHealth denies the allegations in Paragraph 609.

610. Paragraph 610 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth admits Paragraph 610 contains quotations from portions of the referenced document. GoHealth otherwise denies any remaining allegations in Paragraph 610.

611. GoHealth denies the allegations in Paragraph 611.

612. GoHealth denies the allegations in Paragraph 612.

613. GoHealth denies the alleged conduct described in Paragraph 613 would be a “violation of federal law.” GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 613 and on that basis denies the allegations.

614. GoHealth denies the allegations in Paragraph 614.

615. GoHealth denies the allegations in Paragraph 615.

616. GoHealth denies the allegations in Paragraph 616.

617. GoHealth denies the allegations in Paragraph 617.

618. Paragraph 618 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits Mr. Blue sent Mr. Filippini and Mr. Burd a draft contract on December 11, 2018. GoHealth otherwise denies the remaining allegations in Paragraph 618.

619. GoHealth denies the allegations in Paragraph 619.

620. Paragraph 620 purports to quote from documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 620 contains quotations from portions of the referenced documents. GoHealth otherwise denies the allegations in Paragraph 620.

621. GoHealth denies the allegations in Paragraph 621.

622. GoHealth denies the allegations in Paragraph 622.

623. GoHealth denies the allegations in Paragraph 623.

624. Paragraph 624 purports to quote from a document. That document speaks for itself.

To the extent a response is required, GoHealth admits Paragraph 624 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 624.

625. Paragraph 625 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth admits Paragraph 625 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 625.

626. GoHealth denies the allegations in Paragraph 626.

627. Paragraph 627 purports to quote from documents. These documents speak for themselves. To the extent a response is required, GoHealth admits that the first sentence of Paragraph 627 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 627.

628. Paragraph 628 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits that Paragraph contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 628.

629. Paragraph 629 purports to quote from documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 629 contains quotations from portions of the referenced documents. GoHealth otherwise denies the allegations in Paragraph 629.

630. GoHealth denies the allegations in Paragraph 630.

631. Paragraph 631 purports to quote from a document. This document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth admits it finalized an agreement with Anthem on May 13, 2019. GoHealth otherwise denies the remaining allegations in Paragraph 631.

632. GoHealth denies the allegations in the first sentence of Paragraph 632. The second sentence of Paragraph 632 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 632 and on that basis denies the allegations. GoHealth otherwise denies the allegations in the last sentence of Paragraph 632.

633. Paragraph 633 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth admits Mr. Bush sent Mr. Jones and Mr. Miller a draft contract on May 23, 2019. GoHealth otherwise denies the allegations in Paragraph 633.

634. GoHealth denies the allegations in Paragraph 634.

635. GoHealth denies the allegations in Paragraph 635.

636. GoHealth denies the allegations in Paragraph 636.

637. GoHealth denies the allegations in Paragraph 637.

638. Paragraph 638 purports to quote a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 638 contains quotations from portions of the referenced document. GoHealth otherwise denies any remaining allegations in Paragraph 638.

639. GoHealth denies the allegations in Paragraph 639.

640. Paragraph 640 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth admits Mr. Miller emailed Mr. Blue on August 5, 2019. GoHealth otherwise denies any remaining allegations in Paragraph 640.

641. GoHealth denies the allegations in Paragraph 641.

642. Paragraph 642 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 642 and on that basis denies the allegations.

643. GoHealth denies the allegations in Paragraph 643.

644. GoHealth denies the allegations in the first sentence of Paragraph 644. The remainder of Paragraph 644 purports to quote from and summarize documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth denies the allegations to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 644 and on that basis denies the allegations.

645. The first and second sentences of Paragraph 645 purport to quote from and summarize documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth denies the allegations to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in first and second sentences of

Paragraph 645 and on that basis denies the allegations. GoHealth denies the remaining allegations in Paragraph 645.

646. Paragraph 646 purports to quote from and summarize a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 646 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 646.

647. GoHealth denies the allegations in Paragraph 647.

648. Paragraph 648 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 648 and on that basis denies the allegations.

649. GoHealth denies the allegations in Paragraph 649.

650. GoHealth denies the allegations in Paragraph 650.

651. GoHealth denies the allegations in Paragraph 651.

652. Paragraph 652 purports to quote from and summarize documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 652 contains quotations from portions of the referenced documents. GoHealth otherwise denies the allegations in Paragraph 652.

653. Paragraph 653 purports to quote from and summarize documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 653 contains quotations from portions of the referenced documents. GoHealth otherwise denies the allegations in Paragraph 653.

654. GoHealth denies the allegations in Paragraph 654.

655. GoHealth denies the allegations in Paragraph 655.

656. GoHealth denies the allegations in Paragraph 656.

657. GoHealth denies the allegations in the first sentence of Paragraph 657. The remainder of Paragraph 657 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 657 contains quotations from a portion of the referenced document. GoHealth otherwise denies the remaining allegations in Paragraph 657.

658. GoHealth denies the allegations in Paragraph 658.

659. GoHealth denies the allegations in Paragraph 659.

660. GoHealth denies the allegations in Paragraph 660.

661. GoHealth denies the allegations in Paragraph 661.

662. Paragraph 662 purports to quote from documents. These documents speak for themselves. To the extent a response is required, GoHealth admits Paragraph 661 contains quotations from portions of the referenced documents. GoHealth otherwise denies the allegations in Paragraph 662.

663. Paragraph 663 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits paragraph 663 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 663.

664. GoHealth denies the allegations in Paragraph 664.

665. Paragraph 665 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 665 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 665.

666. GoHealth denies the allegations in Paragraph 666.

667. GoHealth denies the allegations in Paragraph 667.

668. GoHealth admits that Paragraph 668 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 668.

669. GoHealth denies the allegations in Paragraph 669.

670. GoHealth denies the allegations in Paragraph 670.

671. GoHealth denies the allegations in Paragraph 671.

672. Paragraph 672 purports to quote from a document. That document speaks for itself.

To the extent a response is required, GoHealth admits Mr. Blue sent Mr. Miller a draft contract amendment on August 30, 2020. GoHealth otherwise denies the allegations in Paragraph 672.

673. GoHealth denies the allegations in Paragraph 673.

674. Paragraph 674 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks information or knowledge sufficient to form a belief about the truth or falsity of the allegations in Paragraph 674 and on that basis denies the allegations.

675. GoHealth denies the allegations in Paragraph 675.

676. GoHealth denies the allegations in Paragraph 676.

677. GoHealth denies the allegations in Paragraph 677.

678. GoHealth denies the allegations in Paragraph 678.

679. GoHealth denies the allegations in Paragraph 679.

680. Paragraph 680 purports to summarize and quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 680 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 680.

681. Paragraph 681 purports to summarize and quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 680 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 681.

682. Paragraph 682 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 682 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 682.

683. GoHealth denies the allegations in Paragraph 683.

684. Paragraph 684 purports to quote from documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth admits Paragraph 684 contains quotations from portions of the referenced documents. GoHealth otherwise denies the allegations in Paragraph 684.

685. The first sentence of Paragraph 685 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits the first sentence of Paragraph 685 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in the first sentence of Paragraph 685. GoHealth lacks information or knowledge sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 685 and on that basis denies the allegations.

686. GoHealth denies the allegations in Paragraph 686.

687. GoHealth denies that there was an “underlying business agreement.” GoHealth otherwise lacks information or knowledge sufficient to form a belief about the truth or falsity of the allegations in Paragraph 687 and on that basis denies the allegations.

688. GoHealth denies the allegations in Paragraph 688 to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks information or knowledge sufficient to form a belief about the truth or falsity of the allegations in Paragraph 688 and on that basis denies the allegations.

689. GoHealth denies the allegations in Paragraph 689.

690. GoHealth denies the allegations in Paragraph 690.

691. GoHealth denies the allegations in Paragraph 691.

692. GoHealth denies the allegations in Paragraph 692.

693. GoHealth denies the allegations in Paragraph 693.

694. The first sentence of Paragraph 694 purports to quote from a document. That document speaks for itself. To the extent a response is required, GoHealth admits the first sentence of Paragraph 685 contains quotations from portions of the referenced document. GoHealth lacks information or knowledge sufficient to form a belief about the truth or falsity of the allegations in the second sentence of Paragraph 694 about what “Mr. Webster told his colleagues” and on that basis denies the allegations. GoHealth denies any remaining allegations in Paragraph 694.

695. GoHealth denies the allegations in Paragraph 695.

696. GoHealth denies the allegations in Paragraph 696.

697. GoHealth denies the allegations in Paragraph 697.

698. GoHealth denies the allegations in Paragraph 698.

699. GoHealth denies the allegations in Paragraph 699.

700. Paragraph 700 purports to describe a document. That document speaks for itself. To the extent a response is required, GoHealth admits a GoHealth colleague emailed Mr. Miller a graph on July 12, 2021. GoHealth otherwise denies the allegations in Paragraph 700.

701. Paragraph 700 purports to describe a document. That document speaks for itself. To the extent a response is required, GoHealth admits Paragraph 701 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 701.

702. GoHealth denies the allegations in Paragraph 702

703. GoHealth denies the allegations in Paragraph 703.

704. Paragraph 704 purports to quote a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 704 to the extent they characterize any purported agreement by GoHealth or suggest that “compensation to GoHealth [was shifted] from marketing development funds to administrative overrides.” GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 704 and on that basis denies the allegations.

705. Paragraph 705 purports to quote from and summarize documents. These documents speak for themselves. To the extent a response is required, GoHealth admits that GoHealth executed a contract amendment with Anthem in May 2021. GoHealth otherwise denies the remaining allegations in Paragraph 705.

706. GoHealth denies the allegations in Paragraph 706.

707. Paragraph 707 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the allegations in Paragraph 707 to the extent they characterize any purported agreement by GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 707 and on that basis denies the allegations.

708. GoHealth denies the allegations in Paragraph 708.

709. GoHealth denies the allegations in Paragraph 709.

710. GoHealth denies the allegations in Paragraph 710.

711. Paragraph 711 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth admits that Paragraph 711 contains quotations from portions of the referenced document. GoHealth otherwise denies the allegations in Paragraph 711.

712. GoHealth denies the allegations in Paragraph 712.

3. Response to “Anthem’s Kickbacks to eHealth”

713. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 713 and on that basis denies the allegations.

714. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 714 and on that basis denies the allegations.

715. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 715 and on that basis denies the allegations.

716. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 716 and on that basis denies the allegations.

717. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 717 and on that basis denies the allegations.

718. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 718 and on that basis denies the allegations.

719. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 719 and on that basis denies the allegations.

720. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 720 and on that basis denies the allegations.

721. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 721 and on that basis denies the allegations.

722. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 722 and on that basis denies the allegations.

723. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 723 and on that basis denies the allegations.

724. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 724 and on that basis denies the allegations.

725. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 725 and on that basis denies the allegations.

726. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 726 and on that basis denies the allegations.

727. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 727 and on that basis denies the allegations.

728. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 728 and on that basis denies the allegations.

729. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 729 and on that basis denies the allegations.

730. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 730 and on that basis denies the allegations.

731. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 731 and on that basis denies the allegations.

732. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 732 and on that basis denies the allegations.

733. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 733 and on that basis denies the allegations.

734. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 734 and on that basis denies the allegations.

735. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 735 and on that basis denies the allegations.

736. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 736 and on that basis denies the allegations.

737. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 737 and on that basis denies the allegations.

738. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 738 and on that basis denies the allegations.

739. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 739 and on that basis denies the allegations.

740. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 740 and on that basis denies the allegations.

741. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 741 and on that basis denies the allegations.

742. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 742 and on that basis denies the allegations.

D. Response to “The Defendants’ Kickback Schemes Harmed Medicare Beneficiaries”

743. GoHealth denies the allegations in Paragraph 743.

744. GoHealth denies the allegations in Paragraph 744.

745. Paragraph 745 purports to quote a speaker from a conference. This speaks for itself.

To the extent a response is required, GoHealth denies the allegations in Paragraph 745 to the extent they suggest that GoHealth “led to unhelpful ‘churning’ between plans as well as “higher compliance issues.” GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 745 and on that basis denies the allegations.

746. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 746 regarding Mr. Broussard’s “concerns” and on that basis denies the allegations. GoHealth otherwise denies the remaining allegations in Paragraph 746.

747. GoHealth denies the allegations in Paragraph 747.

748. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations Paragraph 748 regarding what Ms. Gaydosh “reported back to Humana leadership” and on that basis denies the allegations. GoHealth otherwise denies the allegations in Paragraph 748.

749. GoHealth denies the allegations in the first sentence of Paragraph 749 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in the first sentence of Paragraph 749 and on that basis denies the allegations. The remainder of Paragraph 749 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 749 and on that basis denies the allegations.

750. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in first sentence of Paragraph 750 regarding what Aetna knew and on that basis denies the allegations. GoHealth otherwise denies the allegations in the first sentence of Paragraph 750. The remainder of Paragraph 750 purports to quote from a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies the remaining allegations to the extent they suggest that the document referenced in Paragraph 750 represents an “example” of the allegations in Paragraph 750, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the remaining allegations in Paragraph 750 and on that basis denies the allegations.

751. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 751 and on that basis denies the allegations.

752. Paragraph 752 purports to quote from and summarize a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 752 and on that basis denies the allegations.

753. Paragraph 753 purports to quote from and summarize a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 753 and on that basis denies the allegations.

754. GoHealth denies the allegations in Paragraph 754.

755. GoHealth denies the allegations in Paragraph 755.

756. Paragraph 756 purports to quote from and summarize a document. That document, to the extent it exists, speaks for itself. To the extent a response is required, GoHealth denies that the quoted language “accurately surmise[s]” anything about GoHealth.” GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 756 and on that basis denies the allegations.

757. GoHealth denies the allegations in Paragraph 757 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 757 and on that basis denies the allegations.

758. GoHealth denies the allegations in Paragraph 758 to the extent they suggest that the document referenced in Paragraph 758 represents an “example” of the allegations in Paragraph 757, which GoHealth denies. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 758 and on that basis denies the allegations.

759. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 759 and on that basis denies the allegations.

760. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 760 and on that basis denies the allegations.

761. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 761 and on that basis denies the allegations.

762. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 762 and on that basis denies the allegations.

763. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 763 and on that basis denies the allegations.

764. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 764 and on that basis denies the allegations.

V. RESPONSE TO “THE DEFENDANTS MADE MATERIAL FALSE CLAIMS”

A. Response to the “The Defendants Made, or Caused to Be Made, Material False Claims Because They Violated the Anti-Kickback Statute”

765. GoHealth denies the allegations in Paragraph 765.

766. GoHealth denies the allegations in Paragraph 766.

1. Response to “The Defendant Insurers’ Contracts with CMS Required Each Defendant Insurer to Agree to Comply with the AKS”

767. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 767 and on that basis denies the allegations.

768. Paragraph 768 purports to characterize and quote documents. These documents, to the extent they exist, speak for themselves. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 768 and on that basis denies the allegations.

769. The allegations in Paragraph 769 are legal conclusions and characterizations by the Government to which no response is required. To the extent a response is required, GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 769 and on that basis denies the allegations.

770. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 770 and on that basis denies the allegations.

771. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 771 and on that basis denies the allegations.

772. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 772 and on that basis denies the allegations.

773. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 773 and on that basis denies the allegations.

774. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 774 and on that basis denies the allegations.

2. Response to “The Defendant Insurers Certified in Their Claims for Payment That the Information They Provided Was Truthful”

775. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 775 and on that basis denies the allegations.

776. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 776 and on that basis denies the allegations.

777. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 777 and on that basis denies the allegations.

778. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 778 and on that basis denies the allegations.

779. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 779 and on that basis denies the allegations.

780. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 780 and on that basis denies the allegations.

781. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 781 and on that basis denies the allegations.

782. GoHealth denies the allegations in Paragraph 782.

B. Response to “Aetna, Humana, and the Defendant Brokers Made, or Caused to Be Made, Material False Claims Because They Violated Anti-Discrimination Laws, Regulations, and Contractual Provisions”

1. Response to “Aetna and Humana Agreed in Contracts with CMS to Comply with Anti-Discrimination Laws and Regulations”

783. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 783 and on that basis denies the allegations.

784. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 784 and on that basis denies the allegations.

785. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 785 and on that basis denies the allegations.

786. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 786 and on that basis denies the allegations.

787. GoHealth denies the allegations in Paragraph 787 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 787 and on that basis denies the allegations.

2. Response to “Aetna and Humana Conspired with the Defendant Brokers to Discriminate Against Medicare Beneficiaries with Disabilities in Violation of Contractual Requirements”

788. GoHealth denies the allegations in Paragraph 788 to the extent they relate to GoHealth. GoHealth otherwise lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 788 and on that basis denies the allegations.

789. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 789 and on that basis denies the allegations.

790. GoHealth denies the allegations in Paragraph 790.

VI. RESPONSE TO “EXAMPLES OF FALSE CLAIMS TO THE GOVERNMENT”

A. Response to “Humana and GoHealth”

791. GoHealth denies the allegations in Paragraph 791.

B. Response to “Humana and SelectQuote”

792. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 792 and on that basis denies the allegations.

C. Response to “Humana and eHealth”

793. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 793 and on that basis denies the allegations.

D. Response to “Aetna and eHealth”

794. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 794 and on that basis denies the allegations.

E. Response to “Aetna and SelectQuote”

795. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 795 and on that basis denies the allegations.

F. Response to “Aetna and GoHealth”

796. GoHealth denies the allegations in Paragraph 796.

G. Response to “Anthem and GoHealth”

797. GoHealth denies the allegations in Paragraph 797.

H. Response to “Anthem and eHealth”

798. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 798 and on that basis denies the allegations.

VII. RESPONSE TO “CAUSES OF ACTION”

Response to “COUNT I Violation of the False Claims Act: Presentation, or Causing Presentation, of False or Fraudulent Claims for Payment Resulting from a Violation of the Anti-Kickback Statute (31 U.S.C. § 3729(a)(1)(A)) All Defendants”

799. GoHealth restates the responses above as if fully set forth herein.

800. GoHealth denies the allegations in Paragraph 800.

801. GoHealth denies the allegations in Paragraph 801.

802. GoHealth denies the allegations in Paragraph 802.

803. GoHealth denies the allegations in Paragraph 803.

Response to “COUNT II Violation of the False Claims Act: Presentation, or Causing Presentation, of False or Fraudulent Claims for Payment (31 U.S.C. § 3729(a)(1)(A)) All Defendants”

804. GoHealth restates the responses above as if fully set forth herein.

805. GoHealth denies the allegations in Paragraph 805.

806. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 806 and on that basis denies the allegations.

807. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 807 and on that basis denies the allegations.

808. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 808 and on that basis denies the allegations.

809. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 809 and on that basis denies the allegations.

810. GoHealth denies the allegations in Paragraph 810.

811. GoHealth denies the allegations in Paragraph 811.

812. GoHealth denies the allegations in Paragraph 812.

813. GoHealth denies the allegations in Paragraph 813.

814. GoHealth denies the allegations in Paragraph 814.

815. GoHealth denies the allegations in Paragraph 815.

Response to “COUNT III Violation of the False Claims Act: Presentation, or Causing Presentation, of False or Fraudulent Claims for Payment (31 U.S.C. § 3729(a)(1)(A))”

816. GoHealth restates the responses above as if fully set forth herein.

817. GoHealth denies the allegations in Paragraph 817.

818. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 818 and on that basis denies the allegations.

819. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 819 and on that basis denies the allegations.

820. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 820 and on that basis denies the allegations.

821. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 821 and on that basis denies the allegations.

822. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 822 and on that basis denies the allegations.

823. GoHealth denies the allegations in Paragraph 823.

824. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 824 and on that basis denies the allegations.

825. GoHealth denies the allegations in Paragraph 825.

826. GoHealth denies the allegations in Paragraph 826.

827. GoHealth denies the allegations in Paragraph 827.

Response to “COUNT IV Violation of the False Claims Act: False Records or Statements Material to False or Fraudulent Claims (31 U.S.C. § 3729(a)(1)(B))”

828. GoHealth restates the responses above as if fully set forth herein.

829. GoHealth denies the allegations in Paragraph 829.

830. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 830 and on that basis denies the allegations.

831. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 831 and on that basis denies the allegations.

832. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 832 and on that basis denies the allegations.

833. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 833 and on that basis denies the allegations.

834. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 834 and on that basis denies the allegations.

835. GoHealth denies the allegations in Paragraph 835.

836. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 836 and on that basis denies the allegations.

837. GoHealth denies the allegations in Paragraph 837.

838. GoHealth denies the allegations in Paragraph 838.

839. GoHealth denies the allegations in Paragraph 839.

Response to “COUNT V Violation of the False Claims Act: False Records or Statements Material to False or Fraudulent Claims (31 U.S.C. § 3729(a)(1)(B))”

840. GoHealth restates the responses above as if fully set forth herein.

841. GoHealth denies the allegations in Paragraph 841.

842. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 842 and on that basis denies the allegations.

843. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 843 and on that basis denies the allegations.

844. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 844 and on that basis denies the allegations.

845. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 845 and on that basis denies the allegations.

846. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 846 and on that basis denies the allegations.

847. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 847 and on that basis denies the allegations.

848. GoHealth denies the allegations in Paragraph 848.

849. GoHealth lacks knowledge or information sufficient to form a belief about the truth or falsity of the allegations in Paragraph 849 and on that basis denies the allegations.

850. GoHealth denies the allegations in Paragraph 850.

851. GoHealth denies the allegations in Paragraph 851.

852. GoHealth denies the allegations in Paragraph 852.

Response to “COUNT VI Violation of the False Claims Act: Conspiracy to Violate 31 U.S.C. §§ 3729(a)(1)(A)) and 3729(a)(1)(B)) (31 U.S.C. § 3729(a)(1)(C))”

853. GoHealth restates the responses above as if fully set forth herein.

854. GoHealth denies the allegations in Paragraph 854.

855. GoHealth denies the allegations in Paragraph 855.

856. GoHealth denies the allegations in Paragraph 856.

857. GoHealth denies the allegations in Paragraph 857.

Response to “COUNT VII Violation of the False Claims Act: Conspiracy to Violate 31 U.S.C. §§ 3729(a)(1)(A)) and 3729(a)(1)(B)) (31 U.S.C. § 3729(a)(1)(C))”

858. GoHealth restates the responses above as if fully set forth herein.

859. GoHealth denies the allegations in Paragraph 859.

860. GoHealth denies the allegations in Paragraph 860.

861. GoHealth denies the allegations in Paragraph 861.

Response to COUNT VIII Unjust Enrichment

862. The Court has dismissed all of the Government's claims relating to Unjust Enrichment against GoHealth and therefore no response to Paragraph 862 is required. To the extent a response is required, GoHealth restates the responses above as if fully set forth herein.

863. The Court has dismissed all of the Government's claims relating to Unjust Enrichment against GoHealth and therefore no response to Paragraph 863 is required. To the extent a response is required, Paragraph 863 is denied and GoHealth otherwise reserves all rights to challenge the legal conclusions set forth in the Complaint.

864. The Court has dismissed all of the Government's claims relating to Unjust Enrichment against GoHealth and therefore no response to Paragraph 864 is required. To the extent a response is required, Paragraph 864 is denied and GoHealth otherwise reserves all rights to challenge the legal conclusions set forth in the Complaint.

865. The Court has dismissed all of the Government's claims relating to Unjust Enrichment against GoHealth and therefore no response to Paragraph 865 is required. To the extent a response is required, Paragraph 865 is denied and GoHealth otherwise reserves all rights to challenge the legal conclusions set forth in the Complaint.

866. The Court has dismissed all of the Government's claims relating to Unjust Enrichment against GoHealth and therefore no response to Paragraph 866 is required. To the extent a response is required, Paragraph 866 is denied and GoHealth otherwise reserves all rights to challenge the legal conclusions set forth in the Complaint.

VIII. RESPONSE TO "PRAYER FOR RELIEF"

GoHealth denies the allegations contained in the United States's prayer for relief and denies that the United States is entitled to any relief.

DEFENDANT GOHEALTH'S AFFIRMATIVE AND/OR ADDITIONAL DEFENSES¹

First Defense

The Government has suffered no damages as a result of the conduct alleged in the Complaint—including (without limitation) because there is no dispute that all beneficiaries for whose coverage the Government may have paid any Defendant were eligible for the Medicare Advantage program, such that the Government would have made the same amounts of capitated payments for the same beneficiaries, regardless of the facts the Government alleges give rise to its claims.

Second Defense

The Government's claims are barred because at all times, GoHealth acted in good faith and without fraudulent intent to ensure compliance with applicable federal, state or local statutes or regulations, and it has been GoHealth's policy to comply with all applicable laws and regulations. GoHealth also acted in reasonable reliance upon regulatory interpretations and judgments by others, including Government officials and employees, upon whom it was entitled to rely. GoHealth's actions constituted lawful, proper, justified, and/or privileged conduct in accordance with the governing statutes and regulations.

Third Defense

The Government's claims are barred, in whole or in part, because GoHealth's conduct did not cause or proximately cause any false claim or certification, or the alleged loss and/or damages.

Fourth Defense

The Government's claims are barred, in whole or part, by government knowledge.

Fifth Defense

The Government's claims are barred, in whole or part, as the occurrences referenced in the Complaint and all damages, if any, resulting therefrom were caused by the acts or omissions of third parties over whom GoHealth had no control.

Sixth Defense

The Government's claims are barred, in whole or part, because it has not adequately alleged that GoHealth had knowledge of the false claims alleged.

Seventh Defense

¹ By listing any defense here, GoHealth does not concede that the defense is affirmative and/or that GoHealth bears the burden of proof on such defense. To the contrary, several defenses listed here focus on elements that the Government must prove in order to prevail on one or more of its claims and that GoHealth maintains that the Government will be unable to prove.

The Government's claims are barred as a matter of law because the Government cannot establish materiality to payment.

Eighth Defense

The Government's claims are barred, in whole or in part, by the doctrines of consent, waiver, release, and/or ratification.

Ninth Defense

The Government's claims are barred, in whole or in part, to the extent that the statutes it seeks to enforce, or the damages and penalties it seeks to recover, violate GoHealth's constitutional rights, including, but not limited to, under the Appointments, Vesting, Take Care, Excessive Fines, and Due Process clauses, or any other constitutional provision.

Tenth Defense

The Government's ability to pursue this action and/or retain any portion of the proceeds therefrom is barred, in whole or in part, by the doctrine of estoppel and/or license.

Eleventh Defense

The Government's claims are barred, in whole or in part, and any recovery should be diminished, reduced, or offset, due to the comparative and/or contributory negligence, fault, responsibility, or causation of others and/or to the extent they are duplicative or otherwise overlapping across Defendants in this case or in other cases.

Twelfth Defense

The Government's claims are barred, in whole or part, because there is no underlying violation of federal regulatory requirements.

Thirteenth Defense

The Government's claims are barred, in whole or in part, by the applicable statute of limitations.

Fourteenth Defense

The Government's claims are barred, in whole or in part, because it failed to mitigate any damages it claims to have sustained.

Fifteenth Defense

The Government's claims are barred, in whole or in part, because the Government did not rely, reasonably or otherwise, on any alleged misrepresentation, omission, deceptive act, unfair act, unconscionable act, or the like by GoHealth.

Sixteenth Defense

The Government's claims are barred, in whole or in part, because Defendants did not present or cause to be presented any false claim, record, or statement to the Government.

Seventeenth Defense

The Government's claims are barred, in whole or in part, because the alleged conduct of employees cannot be imputed to GoHealth under the doctrine of respondeat superior.

Eighteenth Defense

The Government's claims are barred, in whole or in part, because they rely upon ambiguous provisions of law and regulation, which cannot constitutionally be applied to support an FCA claim, and also because the rule of lenity requires such ambiguities to be resolved in GoHealth's favor.

Nineteenth Defense

The Government's claims are barred, in whole or in part, by the voluntary payment doctrine.

Twentieth Defense

The Government's claims are barred, in whole or in part, because the Complaint fails to state a claim upon which relief can be granted.

Twenty-First Defense

The Government's claims are barred, in whole or in part, because due process, fair notice principles, and the rule against retroactive imposition of liability preclude the Government from imposing FCA liability based on novel, changed, inconsistent, or inadequately expressed agency interpretations of statutes or regulations.

Twenty-Second Defense

GoHealth will rely upon all affirmative or additional defenses that may become known to them or available during the course of this action and reserves the right, upon completion of investigation and discovery, to amend or supplement the additional defenses contained herein as may be appropriate.

Jury Demand

GoHealth demands a trial by jury in this action of all issues so triable.

PRAYERS FOR RELIEF

WHEREFORE, GoHealth denies that the United States of America is entitled to any relief set forth in the “Causes of Action” or otherwise.

WHEREFORE, GoHealth respectfully prays that the Court:

Enter judgment in GoHealth’s favor and dismiss this action with prejudice; and

Grant GoHealth such other and further relief as the Court may deem just and proper.

Dated: May 22, 2026

Respectfully submitted,

/s/ Laura McLane

Laura McLane (BBO #644573)

David Gacioch (BBO #660784)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record via ECF on May 22, 2026.

/s/ Laura McLane

Laura McLane

Dated: May 22, 2026