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September 14, 2020

The Honorable Kenneth M. Karas  
United States District Court  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: United States ex. rel. Cutler v. Cigna Corp. et al., No. 17-cv-5715 (KMK)  
Request for Pre-Motion Conference for Defendants' Motion to Transfer Venue

Dear Judge Karas,

Relator writes in response to Defendants' letter motion seeking to transfer venue pursuant to 28 U.S.C. § 1404(a). Defendants claim that venue should be transferred because (1) this action could have been brought in the Middle District of Tennessee ("MDTN") and (2) the MDTN is the most convenient forum because it is where "the relevant business entities, documents and witnesses" are located. However, neither of these points are accurate.

As a preliminary matter, this case could not have been brought in the MDTN. In order for the Court to find that it could have been, each defendant must be subject to personal jurisdiction in the MDTN. *See Posven, CA v. Liberty Mut. Ins. Co.*, 303 F. Supp.2d 391, 401-02 (S.D.N.Y. 2004). Personal jurisdiction does not exist merely because the transferee court is the proper venue to bring the action under 31 U.S.C. § 3732. *See U.S. v. Dowty Woodville Polymer, Ltd.*, 110 F.3d 861, 865-66 (2d. Cir 1997); *U.S. v. Universal Fruits and Vegetables Corp.*, 370 F.3d 829, n. 13 (9th Cir. 2004). Rather, it must be shown that the transferee court has jurisdiction over the individual defendants. This necessarily means that each defendant must have minimum contacts with the forum state where the court is located. *See International Shoe Co. v. Washington*, 326 U.S. 310, 321 (1945); *U.S. ex rel. McCarthy v. Straub Clinical and Hospital, Inc.*, 140 F. Supp. 2d 1062, 1071-72 (D. Hawaii 2001).

Here it is evident that the District Court for the MDTN lacks personal jurisdiction over most of the Defendants. Only 2 of the 9 Defendants have any operations in Tennessee. According to the Tennessee Secretary of State's online database, only 3 defendants are registered to transact business in the state (see attached **Exhibit A**). Cigna Corporation ("Cigna"), the defendants' ultimate operating parent company and the architect of the 360 Program, does no business in Tennessee at all. In fact, the District Court for the MDTN ruled in another case that the court could not exercise personal jurisdiction over Cigna due to lack of minimum contacts. *See Kidd v. Cigna Corporation*, No. 3:10-0020 (M.D. Tenn. Nov. 12, 2010). Defendants' argument that Cigna's contacts are manifested by its subsidiaries' operations in the state has no basis in fact. Cigna on its

own web site disclaims any involvement in its subsidiaries' operations, including those located in Tennessee (see attached as **Exhibit B**).

But despite its lack of contacts with Tennessee, Cigna does conduct business in other states, and clearly some of those activities take place in New York. Cigna maintains three offices in the Southern District of New York ("SDNY"), including one office through which it sells insurance products for its subsidiaries' plans. Complaint, ¶ 21. It directly enters into network contracts for these plans in the state (see attached **Exhibit C**). It is also registered to transact business in the state under the name of Cigna Holding Company,<sup>1</sup> and it maintains a registered agent in New York City (as does New Quest LLC, the parent company of all of the HealthSpring entities). Cigna also trades its shares on the New York Stock Exchange, and it periodically holds corporate events and seminars in the state. Complaint, ¶ 21. New York is also connected to this case in that Relator discovered Defendants' fraudulent submissions during arbitration proceedings involving Cigna that were held in New York City in 2017. Surely Cigna would have expected that by disclosing its illicit acts in New York, it might be hauled in to court there.

Without doubt Cigna has minimum contacts with New York and, unlike the MDTN, the SDNY has personal jurisdiction over Cigna. But even if Cigna and its affiliates are subject to personal jurisdiction in the MDTN, Defendants fail to show how MDTN would be a more convenient forum. Defendants simply argue without proof that MDTN is "where the relevant business entities, documents and witnesses are located." Certainly there is nothing in the complaint that substantiates this. The complaint indicates that the 360 Program was nationwide in scope and was operated by Cigna through the use of six contractors operating in 17 states and the District of Columbia." ¶ 8, 42. It involved "interrelated steps and efforts carried out by various teams," including several having no operations in Tennessee at all. Complaint, ¶ 14, 17, 38.

There is also nothing in the complaint that indicates the documents are located in the MDTN. The principal documents in the case include fraudulent records submitted to CMS electronically, internal emails between or among Defendants' personnel and/or its third party contractors, as well as the 360 Forms themselves. Defendants have produced nothing to show that these records were generated, received, stored, transmitted or otherwise connected to operations in Tennessee. Many of these documents can in fact be found in New York because Cigna, its subsidiaries and/or Relator produced them to the arbitration panel during the aforementioned arbitration proceedings.

Likewise, the complaint does not refer to any witnesses located in Tennessee other than Dr. Michael Fessenden and Jason Jean, who are only two of the seven potential witnesses identified in the complaint. Material witnesses not mentioned in the complaint would also include the ultimate decisionmakers for Cigna, including senior officers and directors located in Bloomfield,

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<sup>1</sup> At the time this action commenced in 2017, Cigna was registered to transact business in New York and Connecticut under the name Cigna Corporation. These registrations were subsequently amended on December 31, 2018 to reflect a change in name to Cigna Holding Company (see attached **Exhibit D**). Defendants also disclosed the existence of an entity named Cigna Corporation in its Rule 7.1 Disclosure Statement. To the extent that the name of the proper Defendant is now Cigna Holdings Company, Relator respectfully requests leave to amend his complaint to correct the name of this Defendant.

Connecticut.<sup>2</sup> As Bloomfield is approximately 90 miles from the Southern District of New York, convenience to the witnesses on the whole, as between the SDNY and MDTN, favors the SDNY.

Even if there were some conveniences that could be gained by transferring this case to MDTN, the transfer would severely prejudice Relator. It is important to note that Relator did not bring this case as a *pro se* litigant as Defendants claim, but rather as an attorney-at-law representing the United States' interest. Relator is proceeding in this manner because the courts have repeatedly held that a relator may not proceed *pro se* in a *qui tam* action where, as here, the real party in interest is the United States. See *U.S. ex rel. Mergent Services v. Flaherty*, 540 F. 3d 89, 92 (2d. Cir. 2008); *United States ex rel. Szymczak v. Covenant Healthcare Sys.*, 207 Fed. Appx. 731, 732 (7th Cir. 2006); *U.S. ex rel. Verrinder v. Wal-Mart Corp.*, No. 13-11147-PBS (D. Mass. March 3, 2015). As a result, if this case transfers to the MDTN, Relator will lose his ability to continue his representation. Under the Local Rules of the MDTN, a non-resident attorney may only be admitted *pro hac vice* if the attorney is a member of good standing "of the bar of any other District Court of the United States." Local Rule LR83.01(b). However, Relator is not a member of any bar of any U.S. District Court. Relator's sole bar admission is in New York State. It should also be noted that the SDNY is the nearest federal courthouse to Relator's residence in Westport, Connecticut.

Finally, there is a critical aspect of convenience that Defendants overlook, namely the impact of the COVID-19 pandemic on case participants. In the SDNY all non-emergency civil court proceedings must be conducted remotely, and this confers significant conveniences on those who would otherwise incur the time and expense of travel. See Covid-19 Protocols Memorandum from Edward Friedland, District Executive, dated March 20, 2020, at p.2. In the MDTN, on the other hand, while court proceedings may be conducted remotely, it appears that this is not a mandatory obligation. See Administrative Order No. 209 from District Court Judge Waverly D. Crenshaw, Jr., dated Aug. 29, 2020 at ¶ 7. In other words, case participants can be required to travel and attend proceedings in-person. This poses not only potential inconveniences in terms of travel time and expense but also carries the risk of potentially exposing non-Tennessee residents, such as Relator, to serious health risks for contracting and spreading COVID-19. In addition, many non-Tennessee residents, including Relator and others in Connecticut, would be subject to a mandatory 14-day self-quarantine upon returning home. See Executive Order No. 7III, dated July 21, 2020 issued by Connecticut Governor Ned Lamont. These are significant factors that strongly weigh against transferring venue to the MDTN.

In short, Relator's choice in venue must be honored. The MDTN lacks personal jurisdiction over most of the Defendants and, in any event, there is no basis to find that the MDTN is a more convenient forum.

Respectfully Submitted,

/s/ Robert A. Cutler

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<sup>2</sup> The names and addresses of some of these individuals are set forth in Exhibit D.



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Control #	Entity Type	Name	Name Type	Name Status	Entity Filing Date	Entity Status
<a href="#">000512568</a>	LP-88	GULFQUEST, LP TEXAS	Entity	Active	02/03/2006	Active

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Control #	Entity Type	Name	Name Type	Name Status	Entity Filing Date	Entity Status
<a href="#">000503133</a>	CORP	HEALTHSPRING, INC. DELAWARE	Entity	Active	09/26/2005	Active

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[Click Here](#) for information on the Business Services Online Search logic.

**Division of Business Services**  
 312 Rosa L. Parks Avenue, Snodgrass Tower, 6th Floor  
 Nashville, TN 37243  
 615-741-2286  
 8:00 a.m. until 4:30 p.m. (Central) Monday - Friday.  
[Directions](#) | [State Holidays](#) | [Methods of Payment](#)

Business Filings and Information (615) 741-2286 | [TNSOS.CORPINFO@tn.gov](mailto:TNSOS.CORPINFO@tn.gov)

Certified Copies and Certificate of Existence (615) 741-6488 | [TNSOS.CERT@tn.gov](mailto:TNSOS.CERT@tn.gov)

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Notary Commissions (615) 741-3699 | [TNSOS.ATS@tn.gov](mailto:TNSOS.ATS@tn.gov)

Uniform Commercial Code (UCC) (615) 741-3276 | [TNSOS.UCC@tn.gov](mailto:TNSOS.UCC@tn.gov)

Workers' Compensation Exemption Registrations (615) 741-0526 | [TNSOS.WCER@tn.gov](mailto:TNSOS.WCER@tn.gov)

Apostilles & Authentications (615) 741-0536 | [TNSOS.ATS@tn.gov](mailto:TNSOS.ATS@tn.gov)

Summons (615) 741-1799 | [TNSOS.ATS@tn.gov](mailto:TNSOS.ATS@tn.gov)

Trademarks (615) 741-0531 | [TNSOS.ATS@tn.gov](mailto:TNSOS.ATS@tn.gov)

Nonresident Fiduciaries (615) 741-0536 | [TNSOS.ATS@tn.gov](mailto:TNSOS.ATS@tn.gov)



## Tennessee Secretary of State

Tre Hargett

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Business Services Online > Find and Update a Business Record

# Business Information Search

As of September 12, 2020 we have processed all corporate filings received in our office through September 09, 2020 and all annual reports received in our office through September 09, 2020.

Click on the underlined control number of the entity in the search results list to proceed to the detail page. From the detail page you can verify the entity displayed is correct (review addresses and business details) and select from the available entity actions - file an annual report, obtain a certificate of existence, file an amendment, etc.

**Search:** 1-1 of 1

Search Name:   Starts With  Contains

Control #:

Active Entities Only:

Control #	Entity Type	Name	Name Type	Name Status	Entity Filing Date	Entity Status
<a href="#">000396549</a>	LLC	NEWQUEST, LLC TEXAS	Entity	Active	09/29/2000	Active

1-1 of 1

Information about individual business entities can be queried, viewed and printed using this search tool for free.

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- Uniform Commercial Code (UCC) (615) 741-3276 | [TNSOS.UCC@tn.gov](mailto:TNSOS.UCC@tn.gov)
- Workers' Compensation Exemption Registrations (615) 741-0526 | [TNSOS.WCER@tn.gov](mailto:TNSOS.WCER@tn.gov)
- Apostilles & Authentications (615) 741-0536 | [TNSOS.ATS@tn.gov](mailto:TNSOS.ATS@tn.gov)

Summons (615) 741-1799 | [TNSOS.ATS@tn.gov](mailto:TNSOS.ATS@tn.gov)

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## CIGNA COMPANY NAMES

All Cigna products and services are provided exclusively by or through operating subsidiaries of Cigna Corporation, and not by Cigna Corporation. Product availability may vary by location and product type and is subject to change. The legal entity insuring or administering any specific product may vary. Refer to your official plan documents for the name of the company that insures or administers your specific insurance policy or benefit plan.

Product	Cigna Company Name(s)
Group Health Maintenance Organization (HMO), including HMO Open Access (OA), Point-of-Service (POS), and OA POS medical plans	AZ - Cigna HealthCare of Arizona, Inc. CA - Cigna HealthCare of California, Inc. <sup>1</sup> CO - Cigna HealthCare of Colorado, Inc. CT - Cigna HealthCare of Connecticut, Inc. FL - Cigna HealthCare of Florida, Inc. <sup>2</sup> GA - Cigna HealthCare of Georgia, Inc. IL - Cigna HealthCare of Illinois, Inc. and Cigna HealthCare of St. Louis, Inc. IN - Cigna HealthCare of Indiana, Inc. and Cigna HealthCare of Illinois, Inc. KS - Cigna HealthCare of St. Louis, Inc. MO - Cigna HealthCare of St. Louis, Inc. and Cigna HealthCare of Tennessee, Inc. NC - Cigna HealthCare of North Carolina, Inc. NJ - Cigna HealthCare of New Jersey, Inc. SC - Cigna HealthCare of South Carolina, Inc. TN - Cigna HealthCare of Tennessee, Inc. TX - Cigna HealthCare of Texas, Inc.
All other group medical plans, and pharmacy and vision plans <sup>3</sup>	Cigna Health and Life Insurance Company ((900 Cottage Grove Road, Bloomfield, CT 06002 USA) or Connecticut General Life Insurance Company (900 Cottage Grove Road, Bloomfield, CT 06002 USA)  In California, Network plans are offered by Cigna HealthCare of California, Inc.
Cigna Behavioral Health, Employee Assistance Program (EAP)	Cigna Behavioral Health, Inc. and Cigna Behavioral Health of California, Inc. <sup>1</sup>

[Log in to myCigna](#)[Find a Doctor](#)[Menu](#)CA - Cigna Dental Health of California, Inc. <sup>1</sup>

CO - Cigna Dental Health of Colorado, Inc.

CT - Cigna HealthCare of Connecticut, Inc.

DE - Cigna Dental Health of Delaware, Inc.

FL - Cigna Dental Health of Florida, Inc. <sup>6</sup>

IL - Cigna Dental Health of Kentucky, Inc.

KS - Cigna Dental Health of Kansas, Inc.

KY - Cigna Dental Health of Kentucky, Inc.

MD - Cigna Dental Health of Maryland, Inc.

MO - Cigna Dental Health of Missouri, Inc.

NC - Cigna Dental Health of North Carolina, Inc.

NE - Cigna Dental Health of Kansas, Inc.

NJ - Cigna Dental Health of New Jersey, Inc.

OH - Cigna Dental Health of Ohio, Inc.

PA - Cigna Dental Health of Pennsylvania, Inc.

TX - Cigna Dental Health of Texas, Inc.

VA - Cigna Dental Health of Virginia, Inc.

In all other states (where available), Cigna Dental Care plans are insured by Cigna Health and Life Insurance Company

All other group dental plans <sup>5</sup>

Cigna Health and Life Insurance Company or Connecticut General Life Insurance Company

Individual and Family Medical Plans

Cigna Health and Life Insurance Company, Connecticut General Life Insurance Company, Cigna HealthCare of Arizona, Inc., Cigna HealthCare of Illinois, Inc., or Cigna HealthCare of North Carolina, Inc.

For information about these plans, including Cigna company name and other information, visit [www.cigna.com/individuals-families/shop-our-health-insurance-plans](http://www.cigna.com/individuals-families/shop-our-health-insurance-plans)

Individual and Family Dental Plans <sup>5</sup>

Cigna Health and Life Insurance Company

For information about these policies, including Cigna company name and other information visit [www.cigna.com/individuals-families/dental-insurance-plans](http://www.cigna.com/individuals-families/dental-insurance-plans)

Group Universal Life

Connecticut General Life Insurance Company

Group Basic &amp; Voluntary Term Life

NY - Cigna Life Insurance Company of New York (140 East 45th Street, New York, NY 10017 USA)

All other states-Life Insurance Company of North America (1601 Chestnut Street, Two Liberty Place, Philadelphia, PA 19192 USA)

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All other states-Life Insurance Company of North America

Administrative services for self-funded disability plans - Life Insurance Company of North America

Group Accident, Accidental Death and Dismemberment,  
Accidental Injury, Hospital Indemnity, and Critical Illness Insurance

NY - Cigna Life Insurance Company of New York

All other states-Life Insurance Company of North America

Cigna Leave Solutions<sup>®</sup> - Group FMLA/ADA Administration

Life Insurance Company of North America

Cigna Supplemental Benefits - Life, Health and Accident  
Insurance

Loyal American Life Insurance Company

For additional information about these policies, visit <https://www.cigna.com/individuals-families/supplemental/>

Cigna Medicare Supplement Insurance

Cigna Health and Life Insurance Company, Loyal American Life Insurance Company, or American Retirement  
Life Insurance CompanyFor Cigna company name and other information about these policies, visit [www.cigna.com/medicare/supplemental/](http://www.cigna.com/medicare/supplemental/)Cigna Onsite Health<sup>®</sup>

Cigna Onsite Health, LLC

Cigna Onsite Clinic

Cigna Onsite Health, LLC <sup>7</sup>

Cigna Stop-Loss Insurance

Cigna Health and Life Insurance Company

Cigna Home Delivery Pharmacy<sup>SM</sup>

Tel-Drug, Inc. and Tel-Drug of Pennsylvania, L.L.C.

Cigna Medical Group in Arizona

Cigna Medical Group is the group medical practice division of Cigna HealthCare of Arizona, Inc.

CignaPlus Savings<sup>®</sup> Dental Discount Program

Cigna Health and Life Insurance Company

Healthy Rewards<sup>®</sup> Health and Wellness Discount Program

Cigna Health and Life Insurance Company

Canada group medical, dental, vision, and evacuation plans

Cigna Life Insurance Company of Canada

In jurisdictions outside the USA and Canada, products and services are offered by or through Cigna Global Insurance Company Ltd. or affiliates and contracted companies.

All insurance policies and group benefit plans may have exclusions, limitations, reduction of benefits and terms under which the policy may be continued in force or discontinued. Rates may vary and are subject to change. Health coverage is provided subject to any deductibles, co-payment, or coinsurance provisions. For a complete list of both covered and not covered services under your plan or policy, including benefits required by your state, see your insurance policy, evidence of coverage, or your employer's insurance certificate or summary plan description.

For additional plan disclosures that may be applicable to your plan or state, please view our Product Disclosures.

1. For additional information and disclosures related to California HMO and other medical, behavioral and dental plans in California, visit <http://www.cigna.com/cignacompanynames/cigna-in-california>.

2. The Cigna HealthCare of Florida, Inc. service area is comprised of the following counties: Brevard, Broward, Clay, Dade, Duval, Hillsborough, Lake (only zip codes 34711, 34714, 34715, 34755), Nassau, Orange, Osceola, Palm Beach, as, Polk, Seminole and Volusia (only zips 32713, 32725, 32738).

3. In Florida, lock-in medical products (including Exclusive Provider Organization, Open Access Plus-IN, Network and Network Open Access plans) are only available for sale to

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with open access features.

5. Cigna Dental Health, Inc. provides network management and other administrative services for Cigna Dental plans.

6. **Cigna Dental Health of Florida, Inc. is a Prepaid Limited Health Services Organization licensed under Chapter 636, Florida Statutes.**

7. In Virginia, worksite health and wellness centers are provided by Cigna Health and Life Insurance Company. In North Carolina, patient care services for worksite health and wellness centers are provided by Cigna HealthCare of North Carolina, Inc. In Michigan and Minnesota, patient care services for worksite health and wellness centers are provided by HS Clinical Services, PC, an independently owned professional corporation. In New Jersey, patient care services for worksite health and wellness centers are provided by Alegis Care, New Jersey, P.C. Cigna Onsite Health, LLC provides management services to worksite health and wellness centers in Michigan, Minnesota, New Jersey, and North Carolina.

### **ALREADY A CUSTOMER?**

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## CIGNA EXPANDS NETWORK IN NEW YORK WITH ADDITION OF WESTCHESTER MEDICAL CENTER HEALTH NETWORK



Media Contacts:

Cigna  
Courtney Nogas  
860.218.0829  
[courtney.nogas@cigna.com](mailto:courtney.nogas@cigna.com)

or

Westchester Medical Center Health Network  
Andrew LaGuardia  
914.493.6532  
[andrew.laguardia@wmchealth.org](mailto:andrew.laguardia@wmchealth.org)

### 06 September 2017

**VAHALLA, NY., SEPTEMBER 6, 2017 - Cigna (NYSE:CI)** and Westchester Medical Center Health Network (WMCHHealth), a 1,700-bed, 10-hospital healthcare system based in Valhalla, NY, have entered into a multi-year contract that adds most of the health network's hospitals and employed physicians to Cigna's network of participating hospitals and doctors in the NY Metro market. The agreement became effective August 15, 2017.

With this addition to the network, Cigna customers who receive acute care and other medical services from WMCHHealth's Westchester Medical Center and Maria Fareri Children's Hospital in Valhalla, MidHudson Regional Hospital in Poughkeepsie, Good Samaritan Hospital in Suffern, Bon Secours Community Hospital in Port Jervis and St. Anthony Community Hospital in Warwick, will now be covered at the in-network benefit level, according to the terms of their health benefits plan. The contract does not apply to behavioral health providers or services.

"We are pleased to expand our offerings to our customers in New York with the addition of Westchester Medical Center Health Network to our network," said Dave Kobus, Cigna's market president for the TriState region. "We strongly believe in being a partner of choice to providers and welcome the opportunity to work together with WMCHHealth to deliver on the promise of our mission to improve the health, well-being and sense of security of the people we serve."

"As the leading healthcare provider in New York's Hudson Valley, the Westchester Medical Center Health Network is committed to providing the very best care to the residents of our region," said Michael D. Israel, President and CEO of WMCHHealth. "We are proud to have reached an agreement with Cigna that is beneficial to both of our organizations, and more importantly, beneficial to the communities who we are honored to serve."

Cigna customers with questions about their plan can call Cigna customer service 24 hours a day, seven days a week at the number on their Cigna ID card.

### About Cigna

Cigna Corporation (NYSE: CI) is a global health service company dedicated to helping people improve their health, well-being and sense of security. All products and services are provided exclusively by or through operating subsidiaries of Cigna Corporation, including Connecticut General Life Insurance Company, Cigna Health and Life Insurance Company, Life Insurance Company of North America and Cigna Life Insurance Company of New York. Such products and services include an integrated suite of health services, such as medical, dental, behavioral health, pharmacy, vision, supplemental benefits, and other related products including group life, accident and disability insurance. Cigna maintains sales capability in 30 countries and jurisdictions, and has more than 95 million customer relationships throughout the world. To learn more about Cigna<sup>®</sup>, including links to follow us on Facebook or Twitter, visit [www.cigna.com](http://www.cigna.com)

### About Westchester Medical Center Health Network

The Westchester Medical Center Health Network (WMCHHealth) is a 1,700-bed healthcare system headquartered in Valhalla, New York, with 10 hospitals on eight campuses spanning 6,200 square miles of the Hudson Valley. WMCHHealth employs more than 12,000 people and has nearly 3,000 attending physicians. From Level 1, Level 2 and Pediatric Trauma Centers, the region's only acute care children's hospital, an academic medical center, several community hospitals, dozens of specialized institutes and centers, skilled nursing, assisted living facilities, homecare services and one of the largest mental health systems in New York State, today WMCHHealth is the pre-eminent provider of integrated healthcare in the Hudson Valley. For more information about WMCHHealth, visit [WMCHHealth.org](http://WMCHHealth.org).

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## Business Inquiry

### Business Details

Business Name:	<b>CIGNA HOLDING COMPANY</b>	Citizenship/State Inc:	<b>Foreign/DE</b>
Business ID:	<b>0131036</b>	Last Report Filed Year:	<b>2020</b>
Business Address:	<b>900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA</b>	Business Type:	<b>Stock</b>
Mailing Address:	<b>900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA</b>	Business Status:	<b>Active</b>
Date Inc/Registration:	<b>Jun 03, 1982</b>	Name in State of INC:	<b>CIGNA HOLDING COMPANY</b>
Annual Report Due Date:	<b>06/30/2021</b>	NAICS Code:	<b>Management of Companies and Enterprises (55 )</b>
		NAICS Sub Code:	<b>Offices of Other Holding Companies (551112 )</b>

### Principals Details

Name/Title	Business Address	Residence Address
TIMOTHY BUCKLEY DIRECTOR/VICE PRESIDENT/TREASURER	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA
MARY T. AGOGLIA HOELTZEL DIRECTOR	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA
ERIC PALMER DIRECTOR/ CHIEF FINANCIAL OFFICER	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA

**IMPORTANT:** There are more principals for this business that are not shown here.

[View All Principals\(5\)](#)

### Agent Summary

Agent Name	<b>C T CORPORATION SYSTEM</b>
Agent Business Address	<b>67 BURNSIDE AVE, EAST HARTFORD, CT, 06108-3408</b>
Agent Residence Address	<b>NONE</b>
Agent Mailing Address	<b>NONE</b>

---

**Business Inquiry**

**Name Change History**

**Business ID**

0131036

**Business Name**

CIGNA HOLDING COMPANY

**Old Name**

CIGNA CORPORATION

**Filing Number**

0006302144

**Filing Date**

Dec 31, 2018



Connecticut's Official  
State Website

The Office of  
**Secretary of the State Denise W. Merrill**

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**Business Inquiry**

**Additional Principals**

**Business ID:** 0131036      **Business Name:** CIGNA HOLDING COMPANY

Total Number of Principals : 5

<b>Name:</b>	<b>Business Address:</b>	<b>Residence Address:</b>
TIMOTHY BUCKLEY DIRECTOR/VICE PRESIDENT/TREASURER	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA
MARY T. AGOGLIA HOELTZEL DIRECTOR	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA
ERIC PALMER DIRECTOR/ CHIEF FINANCIAL OFFICER	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA
DAVID CORDANI PRESIDENT/CHIEF EXECUTIVE OFFICER	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA
JILL STADELMAN SECRETARY	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA	900 COTTAGE GROVE ROAD, WILDE BUILDING, BLOOMFIELD, CT, 06152, USA

# NYS Department of State

## Division of Corporations

### Entity Information

The information contained in this database is current through September 11, 2020.

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Selected Entity Name: CIGNA CORPORATION

Selected Entity Status Information

**Current Entity Name:** CIGNA HOLDING COMPANY

**DOS ID #:** 759656

**Initial DOS Filing Date:** MARCH 25, 1982

**County:** NEW YORK

**Jurisdiction:** DELAWARE

**Entity Type:** FOREIGN BUSINESS CORPORATION

**Current Entity Status:** ACTIVE

Selected Entity Address Information

**DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)**

CIGNA HOLDING COMPANY  
28 LIBERTY STREET  
NEW YORK, NEW YORK, 10005

**Chief Executive Officer**

DAVID CORDANI  
900 COTTAGE GROVE ROAD  
WILDE BUILDING  
BLOOMFIELD, CONNECTICUT, 06152

**Principal Executive Office**

CIGNA HOLDING COMPANY  
900 COTTAGE GROVE ROAD  
WILDE BUILDING  
BLOOMFIELD, CONNECTICUT, 06152

**Registered Agent**

C T CORPORATION SYSTEM  
 28 LIBERTY ST.  
 NEW YORK, NEW YORK, 10005

This office does not record information regarding the names and addresses of officers, shareholders or directors of nonprofessional corporations except the chief executive officer, if provided, which would be listed above. Professional corporations must include the name(s) and address(es) of the initial officers, directors, and shareholders in the initial certificate of incorporation, however this information is not recorded and only available by [viewing the certificate](#).

#### \*Stock Information

# of Shares	Type of Stock	\$ Value per Share
No Information Available		

\*Stock information is applicable to domestic business corporations.

#### Name History

Filing Date	Name Type	Entity Name
DEC 31, 2018	Actual	CIGNA HOLDING COMPANY
MAR 25, 1982	Actual	CIGNA CORPORATION

A **Fictitious** name must be used when the **Actual** name of a foreign entity is unavailable for use in New York State. The entity must use the fictitious name when conducting its activities or business in New York State.

NOTE: New York State does not issue organizational identification numbers.

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