

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Fort Lauderdale Division**

**CASE NO.** \_\_\_\_\_

ABS HEALTHCARE SERVICES, LLC,  
HEALTH OPTION ONE, LLC, AND  
ONE STOP QUOTES, INC.,

Plaintiffs,

v.

ANDREW SHADER, COREY SHADER,  
NATIONAL HEALTH SOLUTIONS, INC.,  
INFINIX MEDIA LLC, PRODIGY  
HEALTH GROUP LLC, ADAM  
BEEMAN, JOY STORMONT,  
ALLIANCE MARKETING CORPORATION,  
KRATOS INVESTMENTS LLC, HEALTH  
TEAM ONE LLC, RICHARD RYSCIK,  
SCOTT OFFUTT, BEEMAN'S FUTURE INC.,  
CS MARKETING LLC, and C SHADER  
INVESTMENTS LLC,

Defendants.

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**COMPLAINT**

Plaintiffs ABS Healthcare Services, LLC (“ABS”) and Health Option One, LLC, (“HOO”), both doing business as Insurance Care Direct (referred to collectively herein as “ICD”), and Plaintiff One Stop Quotes, Inc. (“One Stop Quotes”), sue Defendants Andrew Shader and Corey Shader (collectively, the “Shaders”), National Health Solutions, Inc. (“NHS”), Infinix Media LLC (“Infinix”), Prodigy Healthy Group LLC (“Prodigy”), Adam Beeman (“Beeman”), Joy Stormont (“Stormont”), Alliance Marketing Corporation (“Alliance”), Kratos Investments LLC (“Kratos”), Health Team One LLC (“Health Team”), Richard Ryscik (“Ryscik”), Scott Offutt (“Offutt”),

Beeman’s Future Inc. (“BFI”), CS Marketing LLC (“CS Marketing”), and C Shader Investments LLC (“CSI”) (collectively “Defendants”) and allege upon personal knowledge as to Plaintiffs’ own acts and status, and upon information and belief as to all other matters, as follows:

### **NATURE OF THE CASE**

1. This case is about dishonesty, fraud, and greed. Defendants saw that ICD, a family-owned business, had achieved great success and they sought to profit from ICD’s years of hard work, development, and ingenuity. To that end, Defendants devised a criminal scheme to misappropriate, among other things, ICD’s confidential information, trade secrets, customers, and business through a pattern of racketeering activity spanning years and continuing today.

2. Defendants, acting in concert, have unlawfully, knowingly, and intentionally conducted, and are continuing to conduct, through a pattern of racketeering activity an enterprise referred to herein as the “ICD Misappropriation Enterprise,” an association in fact.

3. The purpose of the ICD Misappropriation Enterprise (or the “Enterprise”) was to surreptitiously and illicitly compete with ICD and steal ICD’s proprietary trade information, trade secrets, business model, agents, and customer base in order to profit for themselves and to harm ICD.

4. The Enterprise was hatched, funded, and directed by Defendants Andrew and Corey Shader, two brothers, working with their close friend and former employee, Defendant Adam Beeman, their confidant, Defendant Scott Offutt, Beeman’s mother, Defendant Joy Stormont, and Beeman’s best friend, Defendant Richard Ryscik. While working under non-compete agreements with ICD, the Shaders plotted and started to set up the Enterprise.

5. The Shaders worked in concert with the other Defendants to open competing businesses using figureheads and fraudulently concealing the real owners—so as to go

undetected—and induce ICD and others to do business with them. These businesses improperly used information about ICD’s business that was obtained by the Shaders and others during the course of their years of work for ICD.

6. The Shaders developed and built the Enterprise by recruiting individuals whom they could easily threaten and control, including felons involved with drug trafficking. The Shaders dangled the promise of quick riches to pull others into the Enterprise, and obtained their loyalty and silence through intimidation, threats, and bribes. On more than one occasion, the Shaders recruited individuals into the Enterprise out of drug rehab programs. On at least one occasion, a past participant in the Enterprise relapsed under the stress of the Enterprise’s illegal activities and died due to an overdose.

7. To prevent ICD from discovering their criminal scheme, Defendants, among other tactics, utilized fake names or aliases in their business dealings, set up front companies, installed “figureheads” such as Defendants Stormont and Ryscik to purport to run those front companies, and communicated on temporary “burner” phones rather than their primary cellphones.

8. But Defendants were unable to fully hide their fraud and deception and, as is often the case, their text messages and fund transfers have left a trail. The money trail leads directly to Defendants, and the text message trail reveals Defendants’ efforts to conceal facts of their scheme and fabricate a “clean” story.

9. ICD and One Stop Quotes bring this action for damages and injunctive relief because Defendants have refused to cease their illegal enterprise and have caused (and continue to cause) ICD and One Stop Quotes substantial harm. Defendants’ acts of racketeering have already caused tens of millions of dollars of harm to ICD and One Stop Quotes, and that harm is continuing.

### **THE PARTIES**

10. Plaintiff ABS is a Florida limited liability company headquartered in Deerfield Beach, Florida.

11. Plaintiff HOO is a Florida limited liability company headquartered in Deerfield Beach, Florida, and acts as a licensed general insurance agency that provides marketing and compliance support and access to products including, but not limited to, limited medical, short term medical, term life, final expense, accidental death, critical illness, dental and discount medical coverage and services such as telehealth access to sub-agencies.

12. Plaintiffs ABS and HOO do business under the name Insurance Care Direct, commonly referred to as “ICD.”

13. Plaintiff One Stop Quotes is a Florida corporation headquartered in Deerfield Beach, Florida, that markets Medicare insurance coverage. One Stop Quotes is owned by the co-founders of ICD.

14. Defendant Andrew Shader is a resident of Broward County, Florida and is *sui juris*.

15. Defendant Corey Shader is a resident of Broward County, Florida and is *sui juris*.

16. Defendant Scott Offutt is a resident of Broward County, Florida and is *sui juris*.

17. Defendant NHS is a Florida corporation doing business in Florida and headquartered at 2425 E. Commercial Blvd., Suite 300, Fort Lauderdale, FL 33308. At all times relevant hereto, Andrew Shader was the President of NHS.

18. Defendant Infinix is a Florida limited liability company doing business in Florida and headquartered at 2425 E. Commercial Blvd. Suite 300, Fort Lauderdale, Florida 33308. Infinix is owned and controlled by Andrew and Corey Shader.

19. Defendant CSI is a Florida limited liability company headquartered in Fort Lauderdale, Florida. CSI is owned and controlled by Defendant Corey Shader.

20. Defendant CS Marketing is a Florida corporation headquartered in Fort Lauderdale, Florida. CS Marketing is owned and controlled by Defendants Corey Shader and Scott Offutt.

21. Defendant Prodigy is a Florida corporation headquartered at 551 NW 26th Street, Pompano Beach, Florida 33064. Prodigy is licensed as an insurance agency in Florida, among other states.

22. Defendant Adam Beeman is a resident of Broward County and is affiliated with Prodigy, Kratos, and Health Team and is *sui juris*.

23. Defendant Joy Stormont is a resident of Palm Beach County and a purported owner of Prodigy and is *sui juris*.

24. Defendant Alliance is a Florida corporation and headquartered at 2425 E. Commercial Blvd., Suite 101, Fort Lauderdale, FL 33308, and is affiliated with Defendant NHS and is owned by Defendants Corey Shader and Andrew Shader.

25. Defendant Kratos is a Florida limited liability company headquartered in Miami Dade County, Florida. Kratos is a licensed 21-05 Florida insurance agency.

26. Defendant Health Team is a Florida limited liability company headquartered in Doral, Florida.

27. Defendant Ryscik is a resident of Broward County, Florida and is *sui juris*. Ryscik is the purported president of Kratos. He is also listed as the authorized representative of Health Team.

28. Defendant BFI is a Florida corporation headquartered in Fort Lauderdale, Florida. BFI is owned and controlled by Adam Beeman.

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