

## New York State Department of Financial Services

Consumer Complaint Case: CSB-2025-01667432

Date Submitted: 09/05/2025

Complaint Type	
Which product or service best describes your complaint?	Insurance Company
Are you a representative filling out this form for someone else?	No
I authorize the entity or individual named in this complaint to furnish to the Department of Financial Services any information related to this matter.	Yes
Who is the person with a complaint?	
Name:	Matthew Edward Keller
Address:	3827 52nd Street 2 FL
Business Name:	
City/State/Zip:	Sunnyside NY 11104
Phone:	(551) 206-0953
Fax:	
Email:	matthew.ed.keller@gmail.com
Complaint Details	
What type of insurance is your complaint about?	Health/Long Term Care/Disability
What type of person/entity is your complaint about?	Insurance Broker/Agent
Who is the person/entity you are complaining about?	
Business Name:	St. John's University
Address:	8000 utopia parkway
City/State/Zip:	Queens NY 11439
Phone:	
Email:	
What is the Policy/Claim Information?	
Policy Number:	
Policy Holder Name:	
Claim Number:	
Is your policy being cancelled or terminated?	No
Does the matter involve a health claim denied as not medically necessary (including cosmetic denials) or that the services were experimental or investigational?	No
Is this related to a declared disaster?	No
Additional Information	

Is a Court or Legal Action pending for this matter?	Yes
Does it include wage garnishment?	No
Describe the pending court action	<p>I have brought an action, pro se seeking injunctive relief and compensatory damages against St. John's University and its insurance partners for violating 4224(b)(1).</p> <p>There is an order to show cause for a temporary restraining order scheduled for September 11th, 2025.</p>
Have you submitted this matter to another agency or attorney?	No
Are you a whistleblower?	No
Is this complaint regarding Elder Financial Abuse?	No
Please enter the details of your complaint here	
<p>For the 2025-2026 academic year, St. John's has started charging different premiums for on- and off-campus students. on-campus students are charged \$3,544 and off-campus students are charged \$11,862.</p> <p>This is a difference of \$8,318 between the premiums charged to resident students and non-resident students. This amounts to non-resident students paying 235% more than resident students.</p> <p>The off-campus premium is an extreme outlier when comparing the premiums of 25 nearby universities. It is 3.7 standard deviations above the mean. This seems to indicate that the premium comes as a result of a small number of extremely high-utilization outliers as opposed to being a fair representation of the risk of a typical student in this group.</p> <p>There are significant actuarial concerns with establishing this as a separate class, most notably adverse selection and credibility as set forth in ASOP No. 12.</p> <p>This extreme price increase is putting the student health insurance plan out of reach for many students which in some circumstances is leading them to have to find new care teams which can be incredibly time intensive and have potential lapses in care.</p> <p>Finally, this price increase, in addition to the fact that the plan is voluntary will invariably lead to an "adverse selection death spiral" which will cause off campus students to lose access to insurance through the school.</p>	
What do you think would be a fair resolution to your complaint?	
An injunction against St. John's University and its insurance partners preventing them from charging different premiums between on-campus and off-campus students.	
How were you referred to the Department of Financial Services?	
<b>Supporting Documentation</b>	

	keller_v_st_johns_commencement_documents.pdf(16738Kb)
--	---

Consumer Complaint Case: CSB-2025-01667432

Date Submitted: 09/05/2025