BEFORE THE INSUR	ANCE CON	MMISSION	ER OF THE
STATE	OF OKLA	HOMA	DEC
STATE OF OKLAHOMA, ex rel. G MULREADY, Insurance Commission)	INSURANCE COMMISSIONER
F	etitioner,)	W. JANEL
v.) C:	nse No. 20-0362-DIS
ALAN DAVID COLE a resident producer,)	
1	8 90 7)	
	Respondent.	.)	

FINAL ADMINISTRATIVE ORDER

This matter is a disciplinary proceeding under the Oklahoma Producer Licensing Act. 36 O.S. §§ 1435.1 et seq. On November 12, 2020, a show cause hearing was held at the Oklahoma Insurance Department ("OID") on OID's Notice of Hearing and Order to Show Cause ("Notice"), filed September 2, 2020. The hearing was held at the offices of OID before Independent Hearing Examiner Charles Alden III. Present at the hearing were Antuanya "Bo" DeBose, Assistant General Counsel for OID, April Moore for OID's Anti-Fraud Division, and Respondent Alan David Cole ("Respondent") appeared pro se.

Witnesses were sworn and testified, exhibits were admitted, and argument of the parties heard.

FINDINGS OF FACT

- 1. OID has jurisdiction over the subject matter of this action pursuant to 36 O.S. §\$101-7401, including the Oklahoma Producer Licensing Act, 36 O.S. §1435.1 et seq.
- 2. That the Insurance Commissioner has the authority to render an Order concerning the above styled matter and has lawfully appointed Independent Hearing Examiner, Charles Alden III, who shall sit as a quasi-judicial officer pursuant to 36 O.S. §319.

- 3. Respondent holds a resident producer license number 3000156473 and is licensed by the State of Oklahoma. Respondent's address of record is
- 4. The Insurance Commissioner may place on probation, censure, suspend, revoke or refuse to issue or renew a license issued pursuant to the Oklahoma Producer Licensing Act 36 O.S. 1435.13(A) and (D).
- 5. Petitioner afforded Respondent an opportunity for hearing by sending the *Notice* by certified mail return receipt requested and by first class U.S. mail on September 2, 2020 to Respondent. The *Notice*, filed on September 2, 2020, stated the matters asserted, and stated the time, place, and nature of the hearing, cited legal authority and jurisdiction, and referred to particular sections of the statutes involved.
- 6. The hearing was recorded electronically by an employee of the Oklahoma Insurance Department. Neither party requested a full stenographic record of the proceedings.
- 7. The following exhibits were introduced and admitted:
 - a. Exhibit A: Combined Insurance's Field Compliance Investigation & Summary Report received by OID on December 14, 2018.
 - b. Exhibit B: Combined Insurance Application listing Tina Woodson as the Insured.
 - c. <u>Exhibit C</u>: Combined Insurance Termination letter for Alan Cole, received by OID on December 13, 2018.
- 8. The following witnesses were sworn and testified under oath:
 - a. April Moore, Investigator with OID.

- b. Alan David Cole, Respondent.
- 9. Combined Insurance Company ("Combined") terminated Respondent's appointment with their company for cause due to fraud. (See *Exhibit C*, along with Testimony of April Moore.)
- 10. OID received a complaint from Combined alleging Respondent submitted fraudulent policies and received sales commissions, along with bonuses based on those policies. Investigator April Moore ("Investigator Moore") of the Anti-Fraud Unit was assigned to the case. (See <u>Testimony of April Moore</u>)
- 11. Combined assigned Bridget Daley ("Daley") to the matter and initiated an investigation after notification was received that most of the policies submitted by Respondent lapsed due to non-payment. (See *Exhibit A* and *Testimony of April Moore*).
- 12. The existence of twenty-eight (28) of the Respondent's policy holders could not be verified. A review of the policies submitted to Combined by the Respondent revealed all the customers' phone numbers were invalid. Daley conducted a test on Respondent's customer payment methods and found the billing associated with the accounts returned as insufficient funds or no account. Respondent earned \$14,042.42 in commissions based on these policies. Respondent earned a total of \$5,150 in bonuses related to personal and fraudulent policies. (See *Exhibit A* and *Testimony of April Moore*).
- 13. Respondent's account with Combined is in a -\$9,107.77 debit, the majority of which is due to the submission of fraudulent applications. (See *Exhibit A* and *Testimony of April Moore*).
- 14. Consumer Tina Woodson informed Investigator Moore that she did not apply for a policy with Combined and never met the Respondent. A policy application for Tina

Woodson, listing Respondent as the Producer, was sent to OID as part of Combined's investigative report. (See *Exhibit A*, *Exhibit B*, and *Testimony of April Moore*).

15. Respondent admitted he 'made up' some of the policy holders he submitted to Combined. (See *Testimony of Alan David Cole*).

CONCLUSIONS OF LAW

- 16. That OID has jurisdiction over this matter and Respondent pursuant to 36 O.S. 1435.1 et seq.
- 17. That Respondent is licensed by OID as a resident producer pursuant to 36 O.S. §1435.1 et seq.
- 18. That Respondent was provided adequate notice and a hearing pertaining to the *Notice*, in accordance with the Oklahoma Insurance Code and Oklahoma Administrative Procedures Act.
- 19. Based upon the provided findings of fact there is clear and convincing evidence to find that Respondent violated the following:
 - a. 36 O.S. §1435.13(A)(8), using fraudulent practices and demonstrating untrustworthiness by submitting twenty-eight (28) fictious insurance policies to Combined Insurance Company on behalf of consumers who either did not exist or did not apply for insurance. Respondent knew these policies were fraudulent at the time he submitted them to Combined. Respondent submitted these fraudulent policies for the purpose of receiving \$14,042.42 in commissions and \$5,150.00 in bonuses.
- 20. Pursuant to the provisions of 36 O.S. §1435.13, the Insurance Commissioner may place on probation, censure, suspend, revoke or refuse to issue or renew a license issued

pursuant to the Oklahoma Producer Licensing Act or may levy a civil penalty of not less than one hundred dollars (\$100.00) nor more than one thousand dollars (\$1,000.00) for each occurrence. Said penalty may be enforced in the same manner in which civil judgements may be enforced.

ORDER

IT IS THEREFORE ORDERED that Respondent Alan David Cole's resident producer license number 3000156473 is hereby revoked. The Insurance Commissioner shall notify all appointing insurers of the revocation and shall notify the Central Office of the National Association of Insurance Commissioners of Respondent's revocation.

December Dated this day of November 2020.

Charles Alden III

INDEPENDENT HEARING EXAMINER

OKLAHOMA INSURANCE DEPARTMENT

Antuanya "Bo" DeBose

ASSITANT GENERAL COUNSEL

OKLAHOMA INSRUANCE DEPARTMENT

Alan David Cole

RESPONDENT

CERTIFICATE OF MAILING

I, Antuanya "Bo" DeBose, hereby certify that a true and correct copy of the above and foregoing Final Administrative Order was mailed by first class U.S. Mail and by certified mail with postage prepaid and return receipt requested on this day of December, 2020 to:

Alan David Cole

CERTIFIED MAIL NO: 9214 8902 0982 7500 0330 20

and that a copy was delivered to:

Licensing Division

Antuanya "Bo" DeBose

RECEIVED BY AGENT LICENSING



DEC 1 4 2018

OKLAHOMA

Field Compliance Investigation & Summary Report

Agent Name/Code	Alan Cole (BIXN)	:	MD/Div	lzze/Diy36		. :
Date:	12/11/2018		Field Com	pliance Investigator	B Daley	
Source :	Gross Compensation Revie	. W				
Violation Type	Fraud, Obstructio		÷			***********
Final Decision (att	ach copies of warning, documen	ted discussion	ı, etcif zer	o tolerancë send back-û	o to licensing):	
Termination for	r Cause					
Summary of Inves		viewed Ag	ent Cole's	production and found	that the majorit	v of

Rield Compliance and Investigations (FCI) reviewed Agent Cole's production and found that the majority of policies submitted had gone down for non-payment on the initial payment. When attempting to contact the customers, FCI found that all of the phone numbers were invalid. FCI also tried to verify customer information through Lexis and could not confirm any information.

FCI was contacted by RD Rick Izze who had also made spot check phone calls on Agent Cole's production and found that none of the phone numbers worked. FCI, RD Izze and SC Kyle Taylor discussed that Agent Cole needed to come into the office for an interview regarding these sales. SC Taylor advised that he reached out to Agent Cole and was advised he had a family member who was sick. SC Taylor continued to follow up with Agent Cole; however he became non-responsive. FCI mailed Agent Cole an interview request letter dated November 1, 2018 via certified return receipt mail. On November 2, 2018 FCI was able to reach Agent Cole who advised he was not aware of an official interview being requested. FCI advised that a recorded interview was needed to discuss his production. Agent Cole advised he was out of town for a funeral and that he would be available the following week to go to the office for the interview. Agent Cole advised his manager Kyle Taylor was aware he was out of town and that he had been in communication with him this whole time. FCI asked Agent Cole to forward his text conversation with SC Taylor.

FCI followed up with Agent Cole via phone call and via text on November 8, 2018 requesting a response; no response was received. FCI did not receive any additional information from Agent Cole.

The Company received a Consumer Complaint from one of Agent Cole's customers advising she had received a bill in the mail for a policy for which she did not apply. The customer (Tina Woodson, V0624350) was not familiar with Agent Cole and advised that the dependent listed on the application was not the correct name for her daughter.

Agent Cole's total APV for the year was \$22,463.46, of that \$19,330.97 (86%) has charged back to his account. Agent Cole's account is in a -\$9,107.77 debit, the majority of which is due to the submission of fraudulent applications.



PCI identified 28 policy holders whose existence could not be verified with billing that was returned (NSF/No Account). Agent Cole earned \$14,042.43 in commissions based on these policies.

Agent Cole earned a total of \$5,150 in bonuses related to personal and fraudulent policies.

Given the overwhelming evidence of fraudulent applications, no other decision then termination for cause would be appropriate for violations of the Zero Tolerance policy as it relates to Fraud and Business Conduct Rule 15, Obstruction.

"Fraud, Withholding material information or submitting, providing or causing to be submitted any materially false information to the company or on any company document in circumstances where a reasonable person would conclude that it was done knowingly. Submitting a fraudulent application (any application with material false or misleading information) is a clear example of fraud."

"15. Obstruction – lying, omitting material facts or giving false or misleading information to any company representative who is investigating a possible violation of the Zero Tolerance Policy. Business Conduct Rules, ACE Code of Conduct or any other policy or procedure including, but not limited to, the materials contained in the Commissioned Employee Handbook. Obstruction also includes failing to cooperate with any investigation or encouraging others not to cooperate with an investigation."

Interview Summary (include participants, location, dates, details):

FCI was unable to reach the agent for a formal interview.

Investigation Details (attach all supporting back-up):

William Johnson (V0642125) fam ASP choice written 9/29/18

DOB CAMPING

- 10/5 left voicemail
- Lexis: could not locate using name and address, address exists in Oklahoma city not linked to applicant or agent
- Billing Arvest Bank... 1436 --- terminated -- no account

Allen Cole (V0639609) single parent ASP choice, (V0639616) SPP employment as postal service written 9/28/18 both declined for multiple lapser

Derek Freeman (V0638779) fam ASP choice written 9/28/18

- DOB COMPANION
- 10/5 called line was unavailable, no vmail
- Lexis: could not locate using name and address. Address exists
- Billing BOFI...6201 terminated-no account

Decharles Hayes (V0638773) indv ASP choice, (7GC42316) written 9/28/18

- DOB Controversive
- 10/5 called, line is a recording for debt collection agency
- Lexis: located a Decharles Hayes with poss DOB
- Billing Bank of the West...5300 terminated no account

AGENT LICENSING

DEC 1-4 ZING

Lavell Crump (V0637070) fam ASP choice written 9/26/18 DOB OWNWOOD 10/5 called, line was for a business on wait time

- Lexis: could not locate using name and address, address exists
- Billing Chase Bank... 8852 terminated no account

RECEIVED BY AGENT LICENSING

DEC 1 4 2018

OKLAHOMA INSURANCE DEPARTMENT

Thomas Bruner (V0637065) fam ASP choice written 9/22/18

DOB Warking

- 10/5 called, male answered advising no Thomas at this number
- Lexis: could not locate using name and address, address exists
- Billing Metabank...9384 terminated no account

Chrystal Martin (V0633966) single parent ASP choice (7GC42315) written 9/21/18

DOB 19709015899

- 10/5 called, line not in service
- Lexis: located a Chrystal Martin DOB, no link to agent. No link to address on app
- Billing Bank of America...3790 terminated no account

Melvin Rucker (V0633963) couples AP choice written 9/15/18

- 10/5 tried numerous times, line always had busy signal
- Lexis: could not locate using name and address, address exists:
- Billing Metabank...9370 terminated insufficient funds

Stephen Cooper (V0633796) single parent ASP choice written 9/14/18

- DOB MONOGRA
- 10/5 left voicemail for call back
- Lexis: could not locate using name and address, address exists linked to Campbell
- Bank of America...0957, terminated

George Tucker (V0631634) couples ASP choice written 9/14/18

, DOB COMMENTON,

- 10/5 called, line rang twice then went to no service signal.
- Lexis: could not locate using name and address, address exists
- Billing first fidelity... 1538- terminated

Darshel Davis (V0631633) fam ASP choice written 9/12/18

- DOB WWW.
- 10/11 Rick Izze team called, line not in service
- · Came back as no account at initial billing
- Lexis: could not locate using name and address, address exists.
- Billing BOFI...4264, terminated no account

Thomas Edwards (V0607740) fam ASP choice written 8/24/18

DOB CONTRACTOR

- 10/11 Rick Izze team called, line not in service
- Lexis: could not locate using name and address, address exists

Billing Bank of America...3476, terminated AGENT LICENSING Doug Redus (V0631630) fam ASP choice written 8/25/18 DEC 1 4 2018 DOB 488/449/1968: 10/11 Rick Izze team called, invalid phone number OKLAHOMA Lexis: could not locate using name and address, address exists INSURANCE DEPARTMENT Billing BOFI...5480, terminated Rosa Ortiz (V0631629) fam ASP choice written 8/25/18 DOB 45/94/1990 10/11 Rick Izze team called, line not in service Lexis: could not locate using name and address, address does not exist Billing BOFL...4198, terminated Alan Cole (7GC42310)- written 8/26/18 - insufficient funds: Billing Metabank...4955, terminated Jeremy Spencer (V0629642) fam ASP choice written 8/25/18 DOB COMMINION 10/11 Rick Izze team called, line disconnected Lexis: could not locate using name and address, address exists Billing First Fidelity...0278, terminated Christian Fuller (V0629643) fam ASP choice. DOB CONTRACTOR 10/11 invalid phone number Lexis; could not locate using name and address, address exists Billing Tinker FCU...1548 Malaysia Moore (V0629641) indv ASP choice written 8/11/18 DOB 40000000 10/11 Rick Izze team called, wrong number Lexis: could not locate using name and address, address exists Billing Bank of America...0008, terminated no account Mailaika Moore (V0629640) fam ASP choice written 8/11/18 DOB MARKETINGS 10/11 Rick Izze team called, wrong number Lexis: could not locate using name and address, address exists Billing Bank of America...0008, terminated no account Wendi Mason (7GC42312) written 8/12/18

(26/6/24/2019)

10/11 Rick Izze team called, left message

Billing Green Dot...8225, terminated no account

Lexis: could not locate using name and address, address exists

		And have been by I have been	OV
I	Tina Woodson-complaint (V0624350) single parent ASP choice written 8/10	DIS RECEIVED	CINIC
	- DOB data (1969)	AGENT LICEN	
١	- 10/11 Rick Izze team called, invalid phone number	DEC 1 4 201	8
	 Lexis: could not locate using name and address, address does not exist Billing Arvest Bank1478, terminated no account 	OKLAHOM/	2
	Diffig Parties Distance, 1717 of terminates its investor	INSURANCE DEPA	
	Brian Campbell (V0623029) single parent ASP choice written 8/10/18		
	- 10/11 Rick Izze team called, line not in service	· ·	
	Lexis: could not locate using name and address, address does not exist	per lexis	
-	- Billing Metabank1 143, terminated no account		
	Jason Campbell (V0624351) fam ASP choice written 8/10/18		
	DOB DOB		.
	- 10/11 Rick Izze team called, line not valid		
	Lexis: could not locate using name and address, address does not exist	per lexis	
	- Billing Metabank1134, terminated no account		
1	Andre Stubbs (V0623028) couples ASP choice written 8/4/18	<u> </u>	,
	- 10/11 Rick Izze team called, wrong number		
	- Lexis; located Andre Stubbs at	-line	goes
	to fax tone. Spouse on app is Jessilyn- 1st potential relative on lexis is	same. Alt number on lexis	
	went to voicemail for Mark. No apparent link to agent		
	- Billing Green Dot8211, terminated insufficient funds	* ************************************	
	Kelli Webb (V0621178) single parent ASP choice written 8/3/18		
	DOB 00/1071964,		.
	 10/11 Rick Izze team called, line disconnected Lexis: could not locate using name and address, address does not exist 	ner lexis	
	- Bank of America1468, terminated no account	· Los viero	.
	Vonsin Faniyi (V0621177) indv ASP choice written 8/1/18 DOB	<u> </u>	
	- 10/11 Rick Izze team called, line cannot accept calls at this time		
	- Lexis: search using last name comes back with Awander Faniyi Cole I	DOB linked to agen	t and
	other applicants by that last name		
	- Billing BOFI4198, terminated no account	¥	
1	Wanda Faniyi (7GC42311) written 8/1/18		
	DOB OWNER AND		
	- 10/11 Rick Izze team called, line cannot accept calls at this time.	DOD	Land
	 Lexis: search using last name comes back with Awander Faniyi Cole I other applicants by that last name 	DOB linked to agen	i and
	- Billing BOFL4198, terminated no account		
	Demonal Preduction		
	Personal Production		- 1

Allen Cole (V0639609) single parent ASP choice, (V0639616) SPP written 9/28/18

both declined for multiple lapser

DOB OF THE PARTY.

RECEIVED BY AGENT LICENSING

· DEC 1 4 2018

OKLAHOMA INSURANCE DEPARTMENT

SPP app lists occupation as Postal Service/Mail Sorter

Billing Meta Bank ...4955---declined by Underwriting for multiple lapser

Alan Cole (7GC42310) - written 8/26/18 - insufficient funds

DOB COMMISSION, (

Billing Metabank, .. 4955, terminated

Alan Cole (V0560088) Critical Care 50k, (7GC42309) WL, (V0560087) single parent ASP choice written 7/4/18---insufficient funds

All billing Meta Bank ... 4955, terminated insufficient funds

Alan Cole (V0574610) SPP written 7/11/18—insufficient funds

DOB (2340) 1929.

- Occupation as Insurance sales agent

- Billing meta bank ...4955, terminated insufficient funds

Consumer Complaint Summary from CSI:

On August 10, 2018, an Accident and Sickness Protector application was completed for a Tina Woodson. She recently contacted our call center because she had received a premium notice/letter for the policy. She said she never applied for a policy. The call center representative asked her if she knew agent Alan Cole. She said she never heard of him. When the representative told her the name of the dependent daughter on record, Ms. Woodson stated that was not her daughter's name.

I called her from CSI on October 3, 2018. I assured her that the only information we had on her was the information that was public record. I also told her that in cases where we do not have a bank account or credit card number for a customer, a premium notice (or letter) will be sent. I said that she received a premium notice because we did not have a valid number to charge each month.

Finally, Lasked her if she knew the agent's immediate manager, Kyle Taylor. She said she never heard of him.

While our internal Agent Commission Control sheet shows that Mr. Cole and his immediate manager Mr. Taylor would benefit from the sale in terms of commission, we have only logged a complaint on Mr. Cole's record at this time as he is the writing agent on record.

COMBINED INSURANCE COMPANY OF AMERICA 111 East Wacker Orlive Suite 700 • Chicago, Illinois 60801
Tapply for a pokey based on the following information.
Section 1 - BASIC INFORMATION (Required for all products.)
MITAL LAST RAME
DESIDENCE PLONE NUMBER
O K a h o m a C t y O K 7 3 1 2 0
Home Business Policy Human Business Policy Human Business Policy Human Business
EAVAL AGDITEGS-
Will this policy replace any existing policies? If "yes" please complete Replacement Form. YES NO Is the insured's household income \$10,000 per year or more? If "no", the insured is not eligible for coverage.
An Authorized Interviewer may call to obtain additional information regulated to complete this application. Check most convenient place and time to call:
Home Business () Additional No. (Cell) ()
6:30 a.m 8:00 a.m
(Required for Income Profector and optional for other coverages.) แตะเกิดการ เพลเพลง หลังส
INSUREOR BUSINESS VODINERA
INCOMEGA GOSTARS S VONINES
CITY SIAIR 7IP
(Regulted if Payor different from Insured.) ARXE ARXE FINANS FIRST NAME OF OTHER TRANSLUCION MITAL LAST NAME:
PN/S9'S ITESIDENCE-ADDRESS (II) OHICO THAN ITESIDIED)
COLA SIVATE SILV
(Required for Acoldent & Sickness Protector, Canoer Protector and Critical Care Protector.)
GENEROLARY'S EULL NAME DE REQUIRED)
See Adderdun Ferr
Section 2 - EMPLOYMENT & INCOME INFORMATION (Required it applying for Income Protector only.) 1. Insured's Occupation A p p r a i s e r i
2. Please desoribe all employment dulies performed in detail;
3. I certily that my gross annual earnings, or net earnings it self-employed, at time of application (without overtime, unless
overtime is contradual, and villout other honuses of incentives) is: \$ \$.
d. Are you self-employed or have you been working for the same employer for less than 6 months? (A telephone interview may be required.)
6. Do you currently work in your primary occupation, performing all primary duties, and work at least 30 hours or more per week?
6. Do you currently have any other in force disability coverage with another carrier?
Form No. 164016-CK-818 APPLICATION FOR ACCIDENT AND HEALTH INSURANCE FORM No. 164016-CK-818 APPLICATION FOR ACCIDENT AND HEALTH INSURANCE (09/17)
T. Water for many 11 mar-land
AGENT LICENSING

OKLAHOMA INSURANCE DEPARTMENT

DEC 1 4 2018

EXHIBIT

B

B

АРРЫСАТІОЙ НИМВЕЙ

V 0 6 2 4 3 5 0

5	O	0	2

Sec	Section 3 - UNDERWRITING INFORMATION (Required for Income Protector and Critical Care Protector only.)									
		SUNCO'S WEIG		รับกัติตูร ดกเขยก				BIATE		
F	7		ino.			V4797.4.94/Lumand.II				
1.	Has the Insur	rad radelva	ed any medical AD	ICE or TRE	ATMÉNT (i	om a member	of the medical pro	léssion,	insu	red
			n MEDICINE within					77	Yes	Ŋο
	a. Angina, st	roke, hear	l atlack, atrial libilit	ation, conge	stive heart	fallure, or, a ho	part Valve replacem	eni?		
	b. Liver or ki	dney disar	der, climosis of the	liver, or arga	an tronsplo	ni/?				
	o. Cancer, hi	elanoma,	Çrain lumor, Hodgk	ln's dişease	or leukemi	3?				
	d: Alzhelmer	's disease	, dementle, Peiklas	on's disease	, Mulifple S	iclarosla?	.:			
	e. Chronic of	bstructive i	ung/pulmenary dis	esse, emphy	o to amer	her lung disca	egyza giririga oxyga	n?		
	I. Manic dep	a "noisaeto	chizophrenia, alcoh	olism or dru	g addiction	7.				
.2.	la lhe insured	l listed on	this application for	Insurance ar	n insulin de	pendent diabe	tio?			\Box
3.	Has tho Insur	ed listed t	een diagnosed by or ARC (AIDS Rela	er member of	I Vie medio	al profession a	s having AIDS (Ac	quired immune delicioney Virus)?		
4.	Has the Insur	ed baen o	oʻnvloted ol recklos	drlving or a	irlving unde	the Inluence	of alcohol villin t	hip past 5 years?		
			on Disability? (excl					**************************************		口
	if any of the	abovė qu	estiona are answe	red "Yes", 1	hè (neurer	l is nót eligib	le for coverage.			
G.	Has the insur or Milltary Dis	ed applied ablity) wil	for or received Dis hin the last 12 mor	ability Benel ths?	ilta (i ncludir	ig lhát from w	orkars' compensalli	on, Social Security		
7.	Is the insured treated by die	listed on the l? (A "Yes	the application for I	naurance a r iplying for i	non-Insulin ncome Pro	dopéndent die otootor disqu	ibello taking oral m alliles applicant.)	edication and/or		
в.	In line past 12 disease or dis	: months, I sorder of th	nas a member of th ne back, neck, spin	e medical pr e, or foint?	ofession d	agnosed you	with or treated you	for an injury,		
9,	Have 2 or mo malignant gro	re of the h with while	naured's parents, b they were under t	others or sla te age of 60	ilers bean (?	lllw basongsib	heart disease, ca	ncer, or any		
	medical profes flu, cokie and please provid	ssion of la routine ph la Informa	ysicals? (II "Yes" t atlon on your phy	n medicatlor s answered sician.	na for any o to questic	ther predical c ris 6, 7, 8, 9 d	ondlign(s) not liste or 10, explain belo	d above, excluding w.) In any case,		
Base modi	ical condition	is and avo	ocational activilles	may be ad	ded to you	ir Incomé Pro	tector policy.	xelusionary rider to		
- April 100	Health Condit	lon	Medication/Dosage	Trealment?	Surgery?	Dales	Physician(s) Name: A	ddriss (Street, City, Stat	o, Zip) & I	Brodic
			Vi-line interested of the		\Box				- HOLES	N. S.
			*	Yes No	Yes No	· · · · · ·				
			*	Yes No	Yes No		The state of the s			
				Yes Na	Yes No		**************************************			
	- m-marin-		THE REAL PROPERTY.	144	, roa (10	N				-

Form No. 164016-OK-316 '

2 OF EMPLICATION FOR ACCORDENT AND HEALTH INSURANCE AGENT LICENSING

DEC 1 4 2018

6003

Section 4 - PLAN SELECTION Individual Standard FORM NUMBER PLAN CODE Individual/Spouse X Choice Accident Protector 1 4 0 2 7 ASP Single Parent 🖾 Accident & Sickness Protector. If applying for Acolden//Sickness, the following qualifying question must be answered: Family Qualification Question - Read Carefully: To the best of your knowledge and bellef, have you or any eligible dependent fisted below had any advice or treatment for caricer, diabeles, stroke, heart attack, or other heart condition within the last five (5) years? Insured: Yes X No Spouse: Yes. Children: (Answer for each eligible child below) PLAN CODS FORM NUMBER Individual Plan Standard Cancer Care Protector CAP Family, Plan-Qualification Question - Read Carefully: To the best of your knowledge and belief, have you or any digible dependent listed below had any advice or treatment for cancer, or skin cancer within the last ten (10) years? Insured: Yes No Spouse: Yes No . Children: (Answer for each eligible child below) Critical Care Protector павмий мноч PLÁN COUR MADURT OF INSURANCE Pold Up Rider YES NO 2 O Years 1 6 5 2 1 OCP Has the insured used tobacco products in any form in the last 12 months? Insured: YES NO Income Protector Monthly Benefit Benefit Period FORM NUMBER PLAN CODE 1 9 8 1 0 6 months O 1 year Elmination Period 14 30 . ___ 90 days Occupation Class Section 5 - PREMIUM & BILLING INFORMATION (Required for all products.) BOOK JAYERS X тотак мвода ряслийм \$ ANNL. MIL Section 6 - DEPENDENT INFORMATION Male. (Required If applying for Dependent Coverage Accident & Sickness, Cancer Care Protector). Female SPOUSE'S FIRST NAME LASTKAME SPOUSE'S DATE OF DITTH Quaktcalion Ovalikation Outstoo Chida Name (First Inkin) Loss) Dkvidsto: MorDay/Yr Childs Name (First Initial (Last) Question Birthdate: Mo/DaylYr

LICENSING APPLICATION FOR ACCIDENT AND HEALTH INSURANCE

DEC 1 4 2018

OKLAHOMA INSURANCE DEPARTMENT

Form No. 164016-OK-316

3 of 4

5004

Section 7 – DECLARATIONS – This section must be read, signed, and dated by insured:	
PLEASE READ CAREFULLY It is very important that you review the application carefully. Missialements or omissions whether made in writing or orally for any portion(s) of application that are completed through use of telephone or other electronic means, could cause an otherwise valid claim to be denied. Please check application carefully and advise your agent/producer if any information is not correct or not complete or if any medical history has not been included understand that any insurance applied for will not take effect unless and until Combined Insurance Company of America approves my application contract is issued, and the required premium is received by Combined Insurance Company of America. In applying for this coverage, if represent and affirm the following:	k the
1. The information which I have given as recorded on this Application including Income verification is true and complete to the best of my knowle and belief.	adgo
 I have received the Medical Information Bureau (MIB) Disclosure Statement, the notice under the Fair Crodit Reporting Act. Notice of Information Practices, and (it applicable) Outline of Coverage. If applying for an Accident Only policy, I understand that the policy does not provide benefits for loss from sickness. If applying for Critical Care Protector, I understand that the policy: 1) is NOT major modical and NOT meant to replace modical expense insura and 2) is NOT life insurance. 	
 II applying for the Cancer Care Protector Policy, Lunderstand that the policy is cancer only and does not pay benefits for loss from any other sick or from needleads. FOR PERSONS ELIGIBLE FOR MEDICARE: I acknowledge receipt of the "Guide to Health Insurance" and doplication notice. 	.noss .e.
AUTHORIZATION TO RELEASE MEDICAL INFORMATION I authorize Combined Instrance Company of America or its reinsurers to acquire from and authorize any hospital, physician, medical practitioner, a medically related facility, insurance company, the Medical Information Durgou, Inc. (MIB) or consumer reporting agency or through a personal lelapt interview to release to Combined Insurance Company of America or its reinsurers to disclose all a purpose of evaluating this application for insurance. I also authorize Combined Insurance Company of America or its reinsurers to disclose all a information to any doctor, the Medical Information Bureau, Inc. or any other insurance company in order to evaluate a claim or an application for insurance and interview of the puthorization will be as valid as the original to application shall remain valid for a period of two years from the date of application. A photocopy of this authorization will be as valid as the original revoke this authorization anytime by writing Combined Insurance; however, such revocation may effect coverage, failure to sign this authorization anytime by writing Combined Insurance to evaluate or process this application and may be a basis for denying application.	lione or tho such ance, ginal,
THIS IS A SUPPLEMENT TO HEALTH INSURANCE AND IS NOT A SUBSTITUTE FOR MAJOR MEDICAL COVERAGE. LACK OF MAJOR MEDICAL COVERAGE (OR OTHER MINIMUM ESSENTIAL COVERAGE MAY RESULT IN AN ADDITIONAL PAYMENT WITH YOUR TAXES. If applying for Accident and Sickness Protector, please complete the altestation below. If the Insured checks "No," policy will not be Issued. I hereby altest that I currently have other health coverage such as comprehensive hospital, surgical and/or medical health insurance that qualifies as "minimum essential coverage" in force.	E)
Any person who knowingly and with intent to injure, defraud or deceive any insurer, makes any claim for the proceeds of an insurence pole containing any false, incomplete or misleading information is guilty of a felony.	llcy
l authoriza Combined Insurance to show my name as a policyholder to prospective insureris, 🔀 YES . 🔲 NO	
X Date of Application: 08 10 2018	29
City (whate signed): Okilahoma City Sinte: OK	
I, the authorized agent/producer, have on the Date of Application recorded the information as given to me, I have delivered the Notice of Informations, and where applicable, the Outline of Coverage, I have no knowledge of any unlavorable medical history not recorded on this Applica I certify that I have inspected this application for completeness and according to our field underwriting guidelines it may be submitted to the Hoffice for further underwriting review.	allon tlon. lome
leansed Gont/Producer Alan Cole Signalure BIX	N
ate 08 10 2018 Agont's/Producer's Call Phona Number	
RECEIVED BY	

Form No. 164016-OK-316

APPMGATEM FOR VCCOPENT AND HEALTH INSURANCE

DEC 1 4 2018

COMBINED INSURANCE COMPANY OF AMERICA 11 East Wacker Drive + Suite 700 + Chicago, Illinois 60601 www.combinedinsurance.com

Additional Beneficiary Information

,	,	Application Number 💟	0624350
Principal Insured		Tina Woodson	
			The second section with the second section sec
Beneficiary Type		Beneficiary Information	Percentage
Primary	Edna Gampbell	Mother	100%
·	Date of Birth:	Age: Gender: F 85N:	· · · · · · · · · · · · · · · · · · ·
٠,			
The second secon		PROGRAMA IN HOUSE	
			1-11/1/2
*		and the state of t	<u> </u>
	and an are completely to the completely and the com		
	7,000	and a state to the state of the	
- Additional to a supply the beautiful and the supply the beautiful and the supply the s		7777 12 W 12 A A A A A A A A A A A A A A A A A A	
		V-37 (2)	
		The state of the s	
	a de la companya de l		to the second of the second se
P. Control of the Con	A SAN A SAN AND AND AND AND AND AND AND AND AND A	RECEIVED E	NY N
- Colores - Series - Constant - Colores			
		DEC 1 4 2018	

Form No. 800102

COMBINED INSURANCE COMPANY OF AMERICA 111 East Wacker Drive - Sulle 700 - Chicago, Illinois 60601 www.combinedinsurance.com

Additional Dependent Overflow

	Application Number V0624350
Principal Insured	Tina Woodson
Child's name (First, Middle, Initial, Last)	Qualification Question Date of Birth Age Yes No
Keisha Woodson	6 G
	RECEIVED BY AGENT LICENSING
	DEC 1 4 2018

Form No. 800103

,	Pe	yment Authorization Fe	ol'm	1			
	, Pécu	vring Bank Account/Cred	1 Card				
MSURED.	POLICY NUMBER	TYPE	AMOUNT	Payor same as Insured?			
Tina Woodson.	V0024350	zident & Sjokness Prote	\$107.25	YES NO			
1 1			A la selección es d'Adjuntes com A	_ ' .			
				EVAK VOCORNA CIRVADE			
TO THE PROPERTY OF THE PARTY OF			, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	. OPEUN OAND CHANGE			
		· . · · · · · · · · · · · · · · · · · ·		- I - Chian ordinerional			
	<u> </u>	Total renewal premium billing	\$107.25	пувматитемен			
			laha.u				
		and and	. " .	1			
Payment Method: X Chec	oking Savings	Credit Card E	T/Direct Debk Preferre	d Billing Date (1-28 only)			
				1			
Name of Financial Institution:	Arvest Bank		ity: Lowell	State: AR			
BANKROUNING NUMBER	BANK ACCOUNT NUMBER			9			
08290087	2 0 4 00 8	p)					
CHEDITAPERIT ACCOUNT HUMBER		AUTRIOFREATION CO	CARD THE	HAPIRATION TO VEAT			
	*			¥			
ANDUCE							
Tinai	ANODIFFISIANALE INITIAL LAST NAME TITIA Woods on						
MANAGE AND ASSESSED FOR THE PROPERTY OF THE PR							
N/OR CITY			MANUFACTURE COMPANY AND ADDRESS OF THE PARTY A	ar coo#			
Oklahoma			OK	7 3 1 2 0			
PRODUCTION OF THE PRODUCTION O				Contraction and a second contraction of the			
Albertaniskerati den -	n makkantua mmaki 4						
Insurance"), to initiate elec-	atronio debit entries or e	ffect a change by any of	er commercially accept	any of America ("Combined ded method, to my checking,			
devinte or credil card acc	ni avoda balcallari faud	the financial institution of	(legisted above begins)	Ideb of tradigadel halles to			
received Written notification	n from me of its termina	un in tuli lorce and effect i ition in such time and in	spok manner as to affo	ce and Depository have each ord Combined Insurance and			
Depository a reasonable opportunity to act on it.							
I understand that if any listed policy contains a premium and benefit increase provision, tuture premiums will increase as indicated in the policy Premium and Benefit schedule.							
I agree that If premiums are not paid within the grace period under the subject policy(les), as in the event withdrawals are digitionered, the policy(les) will ferminate. Life policies may have non-forfeiture benefits.							
CHAIL.							
X Time Live	Jaou Dale:	08 10 20	18				
Signalura musi bo lina samo as on Re			-				
aignatura musi oa uta sanna as an tra	at his outsaliting of historial)	found to	CEIVED	2V			
The second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the second section is the second section in the second section in the section is the second section in the section is the second section in the section in the section is the section in the section in the section in the section is the section in the section in the section in the section is the section in the section in the section in the section is the section in the section in the section in the section is the section in the section in the section in the section is the section in the section in the section in the section is the section in the section is the section in the section is the section in the section i		14	and have bed the				

Form No. PAF-R

RECEIVED BY AGENT LICENSING

B/W

DEC 1 4 2018



RECEIVED DREAHOMA INSURANCE DEPARTMENT

OEC 1 3 2018

December 11, 2018

Oklahoma Insurance Department Five Corporate Plaza 3625 NW 56th Street, Suite 100 Oklahoma City, OK 731127

Re: Termination for Cause - Alan Cole (License # 3000156473

To Whom It May Concern:

Enclosed please find a copy of the investigation file which led to this decision as well as copies of the applications in questions.

If you should require any additional information or have any further questions regarding this matter, I can be contacted directly by phone (312) 351-8197, fax (312) 351-6905 or email andrew.wong@combined.com.

Very truly yours;

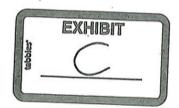
Andrew Wong Licensing Specialist

Combined Insurance

RECEIVED BY AGENT LICENSING

DEC 1 4 2018

OKLAHOMA
INSURANCE DEPARTMENT



SUPPLEMENTAL INSURANCE

Health

Accident

Disability

Life