



DEPARTMENT OF COMMERCE AND INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

In the Matter of:

TYLER J. COOK,

Renewal Applicant.

Case No. 2504070544C

ORDER REFUSING TO RENEW INSURANCE PRODUCER LICENSE

ANGELA L. NELSON, Director of the Missouri Department of Commerce and Insurance (the "Director" of the "Department"), takes up the above matter for consideration and disposition. After reviewing the Petition, the Investigative Report, and the entirety of the Petition file, the Director issues the following findings of fact, conclusions of law, and order:

FINDINGS OF FACT

1. Tyler J. Cook ("Cook") is a Missouri resident with a last reported residential address of 220 Bailey Road, Crystal City, MO 63019, and mailing address of PO Box 482, Crystal City, MO 63019.
2. The Department licensed Cook as an insurance producer on April 2, 2018, and Cook marketed and sold insurance policies underwritten by American Family Life Assurance Company of Columbus ("Aflac").
3. On June 18, 2024, Aflac submitted to the Department a fraud report stating that Cook had forged signatures on applications for insurance, and thereafter Aflac terminated Cook's appointment with Aflac.

4. Cook allowed his insurance producer license to expire on June 30, 2024, but on July 8, 2024, the Department received Cook's application to renew his resident insurance producer license ("Application").

5. The Division investigated Cook's Application and determined the following:

Fraudulent Insurance Applications

6. Cook used an insurance application process through an Aflac enrollment platform called Everwell.
7. The Everwell platform is not automated. It requires the Aflac insurance producer to login and be authenticated to gain access. The insurance producer must navigate to the enrollment page to select the insurance applicant. The insurance producer and insurance applicant must complete several steps to select the insurance products being offered and then begin the application process.
8. During in-person enrollments using Everwell, Cook would go through each application "line by line" with the applicant and discuss the personal information and beneficiaries. The application process requires that several questions be answered, including detailed questions about health history, by selecting or typing a response. At the end of the application process, the applicant must type his or her electronic signature and initials.
9. During in-person enrollments, Cook would identify each insurance policy the applicant was applying for (accident, hospitalization, and/or life), and the applicant would be required to initial each individual policy and type his or her name for all policies listed. All policies for an applicant are transmitted at the same time to Aflac, bundled together.
10. Everwell has never experienced a situation where an application was completed, signed by both the applicant and the insurance producer, and then submitted to Aflac without any engagement from the insurance producer.
11. For all insurance applications described below, Cook was paid commissions by Aflac.

S.P.

12. On September 16, 2022, Cook submitted to Aflac electronic applications for insurance policies naming S.P. as the proposed insured.
13. The applications were purportedly signed by S.P., but S.P. did not sign them.

14. S.P. had passed away on December 2, 2021, over nine months earlier.
15. S.P. was Cook's brother.
16. Cook electronically signed the application documents as if he were S.P. and without S.P.'s authorization.
17. As part of the application process, Cook also electronically signed S.P.'s name to an Authorization to Obtain Information and a Suitability Notice, both of which were documents related to the applications, as if he were S.P. and without S.P.'s authorization.
18. The application documents falsely stated S.P. was a "valid member/employee" of The Truman Advisory Group, a business organized by Cook, and falsely stated that S.P. was actively at work and currently reporting to work with The Truman Advisory Group.
19. Each insurance application purportedly signed by S.P. was also electronically signed by Cook as the "Licensed Associate/Agent" on September 16, 2022.
20. In signing the insurance applications and related documents, Cook falsely certified that he personally saw S.P. when the applications were written, and that each question on the applications was asked of S.P. and answered as recorded.
21. Cook also falsely certified that he had advised S.P. to consider the impact that the coverage has on his paycheck/income, and that Cook agreed with S.P.'s decision that the coverage was appropriate for purchase.
22. On the Aflac New Business Transmittal that was part of the application, Cook signed below a certification that it was his desire "to have all compensation paid as indicated above." Indicated above this certification was 100% payable to Cook.
23. Cook received from Aflac \$420.02 in commissions because of the S.P. applications.

C.G.

24. On October 28, 2022, Cook submitted to Aflac electronic applications for insurance policies naming C.G. as the proposed insured.

25. C.G. was a dependent on an application for Aflac insurance that Cook had previously completed on September 16, 2022.
26. The application documents falsely stated C.G. was a “valid member/employee” of The Truman Advisory Group, and falsely stated that C.G. was actively at work and currently reporting to work with The Truman Advisory Group.
27. On October 28, 2022, the C.G. applications were purportedly signed by C.G., but C.G. did not sign them.
28. Cook electronically signed the application documents as if he were C.G. and without C.G.’s authorization.
29. As part of the application process, Cook also electronically signed C.G.’s name to an Authorization to Obtain Information, a Consent for Electronic Transactions, Records, and Signatures, and a Suitability Notice, all of which were documents related to the applications, as if he were C.G. and without C.G.’s authorization.
30. Each insurance application purportedly signed by C.G. was also electronically signed by Cook as the “Licensed Associate/Agent” on October 28, 2022.
31. In signing the insurance applications and related documents, Cook falsely certified that he personally saw C.G. when the applications were written, and that each question on the applications was asked of C.G. and answered as recorded.
32. Cook also falsely certified that he had advised C.G. to consider the impact that the coverage has on her paycheck/income, and that Cook agreed with C.G.’s decision that the coverage was appropriate for purchase.
33. On the Aflac New Business Transmittal that was part of the application, Cook signed below a certification that it was his desire “to have all compensation paid as indicated above.” Indicated above this certification was 100% payable to Cook.
34. Cook received from Aflac \$434.65 in commissions because of the C.G. applications.

V.R.

35. On November 4, 2022, Cook submitted to Aflac electronic applications for insurance policies naming V.R. as the proposed insured.
36. The application documents identified V.R. as an employee of The Truman Advisory Group.
37. V.R. was never employed by The Truman Advisory Group.
38. The applications were purportedly signed by V.R., with her first name misspelled.
39. V.R. did not sign the applications.
40. Cook electronically signed the application documents as if he were V.R. and without V.R.'s authorization.
41. As part of the application process, Cook also electronically signed V.R.'s name to an Authorization to Obtain Information, a Consent for Electronic Transactions, Records, and Signatures, and a Suitability Notice, all of which were documents related to the applications, as if he were V.R. and without V.R.'s authorization.
42. Each insurance application purportedly signed by V.R. was also electronically signed by Cook as the "Licensed Associate/Agent" on November 4, 2022.
43. In signing the insurance applications and related documents, Cook falsely certified that he personally saw V.R. when the applications were written, and that each question on the applications was asked of V.R. and answered as recorded.
44. Cook also falsely certified that he had advised V.R. to consider the impact that the coverage has on her paycheck/income, and that Cook agreed with V.R.'s decision that the coverage was appropriate for purchase.
45. On the Aflac New Business Transmittal that was part of the application, Cook signed below a certification that it was his desire "to have all compensation paid as indicated above." Indicated above this certification was 100% payable to Cook.
46. Cook received from Aflac \$464.61 in commissions because of the V.R. applications.

CONCLUSIONS OF LAW

47. Section 375.018.4 RSMo Supp. 2024 states, in relevant part:

An individual insurance producer who allows his or her license to expire may, within twelve months from the due date of the renewal fee, reinstate the same license without the necessity of passing a written examination. . . . Nothing in this subsection shall require the director to relicense any insurance producer determined to have violated the provisions of section 375.141.

48. Section 375.141 RSMo¹ states, in relevant part:

1. The director may suspend, revoke, refuse to issue or refuse to renew an insurance producer license for any one or more of the following causes:

* * *

(2) Violating any insurance laws, or violating any regulation, subpoena or order of the director or of another insurance commissioner in any other state;

* * *

(4) Improperly withholding, misappropriating or converting any moneys or properties received in the course of doing insurance business;

(5) Intentionally misrepresenting the terms of an actual or proposed insurance contract or application for insurance;

* * *

(8) Using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere; [or]

* * *

¹ All civil statutory references are to the Revised Statutes of Missouri (2016) unless otherwise indicated.

(10) Signing the name of another to an application for insurance or to any document related to an insurance transaction without authorization[.]

49. Section 375.144 states as follows:

It is unlawful for any person, in connection with the offer, sale, solicitation or negotiation of insurance, directly or indirectly, to:

(1) Employ any deception, device, scheme, or artifice to defraud;

(2) As to any material fact, make or use any misrepresentation, concealment, or suppression;

(3) Engage in any pattern or practice of making any false statement of material fact; or

(4) Engage in any act, practice, or course of business which operates as a fraud or deceit upon any person.

50. The Director may refuse to renew Cook's insurance producer license pursuant to section 375.141.1(2) because Cook violated an insurance law, section 375.144(1). Cook violated section 375.144(1) by employing a deception, device, scheme, or artifice to defraud in connection with the sale of insurance. Cook employed a deception, device, scheme, or artifice to defraud in connection with the sale of insurance each time he created fraudulent applications for insurance naming S.P., C.G., and V.R. as proposed insureds; signed the applications and other related documents as if he were S.P., C.G., and V.R. and without their authorizations; falsely certified in the applications that he personally saw S.P., C.G., and V.R. when the applications were written, that each question on the applications was asked of S.P., C.G., and V.R. and answered as recorded, that he had advised S.P., C.G., and V.R. to consider the impact that the coverage has on his or her paycheck/income, and that he agreed with the S.P.'s, C.G.'s, and V.R.'s purported decisions that the coverages were appropriate for purchase; falsely stated in the applications that S.P. and C.G. were valid members/employees of The Truman Advisory Group and that S.P. and C.G. were actively at work and currently reporting to work with The Truman Advisory Group; and fraudulently transmitted S.P.'s, C.G.'s, and V.R.'s applications to Aflac as if the applications were

authorized and legitimately sold to S.P., C.G., and V.R.

51. Each fraudulent application, false certification, false statement, and false transmittal with respect to S.P., C.G., and V.R. constitutes separate and sufficient grounds under section 375.141.1(2) to refuse to renew Cook's license based on a violation of section 375.144(1).
52. The Director may refuse to renew Cook's insurance producer license pursuant to section 375.141.1(2) because Cook violated another insurance law, section 375.144(2). Cook violated section 375.144(2) when he made or used a misrepresentation, concealment, or suppression of a material fact in connection with the sale of insurance. Cook made or used a misrepresentation, concealment, or suppression of a material fact in connection with the sale of insurance for all of the same reasons stated above with respect to section 375.144(1).
53. Each fraudulent application, false certification, false statement, and false transmittal with respect to the S.P., C.G., and V.R. applications constitutes separate and sufficient grounds under section 375.141.1(2) to refuse to renew Cook's license based on a violation of section 375.144(2).
54. The Director may refuse to renew Cook's insurance producer license pursuant to section 375.141.1(2) because Cook violated another insurance law, section 375.144(3). Cook violated section 375.144(3) when he engaged in a pattern or practice of making a false statement of material fact in connection with the sale of insurance. Cook engaged in a pattern or practice of making a false statement of material fact in connection with the sale of insurance for all of the same reasons stated above with respect to section 375.144(1).
55. The Director may refuse to renew Cook's insurance producer license pursuant to section 375.141.1(2) because Cook violated another insurance law, section 375.144(4). Cook violated section 375.144(4) when he engaged in an act, practice, or course of business which operated as a fraud or deceit upon a person in connection with the sale of insurance. Cook engaged in an act, practice, or course of business which operated as a fraud or deceit upon a person in connection with the sale of insurance for all of the same reasons stated above with respect to section 375.144(1).
56. Each fraudulent act, practice, or course of business with respect to the S.P., C.G., and V.R. applications constitutes separate and sufficient grounds under section 375.141.1(2) to refuse to renew Cook's license based on a violation of section 375.144(4).
57. The Director may refuse to renew Cook's insurance producer license pursuant to

section 375.141.1(4) because Cook misappropriated or converted moneys or properties received in the course of doing insurance business. Cook misappropriated or converted moneys or properties received in the course of doing insurance business each time he submitted to Aflac the fraudulent applications for insurance naming S.P., C.G., and V.R. as proposed insureds and thereby received from Aflac a total of \$1,319.28 in unearned commissions, and in doing so he misappropriated or converted Aflac's money to his own use.

58. Each instance of Cook misappropriating or converting moneys or properties constitutes separate and sufficient grounds to refuse to renew Cook's insurance producer license under section 375.141.1(4).
59. The Director may refuse to renew Cook's insurance producer license pursuant to section 375.141.1(5) because Cook intentionally misrepresented the terms of an actual or proposed insurance contract or application for insurance. Cook intentionally misrepresented the terms of an actual or proposed insurance contract or application for insurance by creating fraudulent applications for insurance naming S.P., C.G., and V.R. as proposed insureds; signing the applications and other related documents as if he were S.P., C.G., and V.R. and without their authorizations; falsely certifying in the applications that he personally saw S.P., C.G., and V.R. when the applications were written, that each question on the applications was asked of S.P., C.G., and V.R. and answered as recorded, that he had advised S.P., C.G., and V.R. to consider the impact that the coverage has on his or her paycheck/income, and that he agreed with S.P.'s, C.G.'s, and V.R.'s purported decisions that the coverages were appropriate for purchase; and fraudulently transmitting the applications to Aflac as if the applications were authorized and legitimately sold to S.P., C.G., and V.R.
60. Each fraudulent application, false certification, false statement, and false transmittal with respect to the S.P., C.G., and V.R. applications constitutes separate and sufficient grounds to refuse to renew Cook's resident insurance producer license under section 375.141.1(5).
61. The Director may refuse to renew Cook's insurance producer license pursuant to section 375.141.1(8) because Cook used fraudulent or dishonest practices. Cook used fraudulent or dishonest practices by creating fraudulent applications for insurance naming S.P., C.G., V.R. as proposed insureds; signing the applications and other related documents as if he were S.P., C.G., and V.R. and without their authorizations; falsely certifying in the applications that he personally saw S.P., C.G., and V.R. when the applications were written, that each question on the applications was asked of S.P., C.G., and V.R. and answered as recorded, that he had advised S.P., C.G., and V.R. to consider the impact that the coverage has on his or her paycheck/income, and that he agreed with S.P.'s, C.G.'s, and V.R.'s

purported decisions that the coverages were appropriate for purchase; and fraudulently transmitting the applications to Aflac as if the applications were authorized and legitimately sold to S.P., C.G., and V.R.

62. The Director may also refuse to renew Cook's insurance producer license pursuant to section 375.141.1(8) because Cook demonstrated incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in this state. Cook demonstrated incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in this state for the same actions as described above with respect to section 375.141.1(8), which were done so that Cook could fraudulently obtain or misappropriate commissions from Aflac.
63. Each fraudulent application, false certification, false statement, and false transmittal with respect to the S.P., C.G., and V.R. applications constitutes separate and sufficient grounds to refuse to renew Cook's resident insurance producer license under section 375.141.1(8).
64. The Director may also refuse to renew Cook's insurance producer license pursuant to section 375.141.1(10) because Cook signed the name of another to an application for insurance or to any document related to an insurance transaction without authorization. Cook signed the names of S.P., C.G., and V.R. to applications for insurance and other documents related to the applications without authorization.
65. Each instance of Cook signing the name of S.P., C.G., and V.R. to applications for insurance, and each instance of Cook signing those names to other documents related to the applications, constitutes a separate and sufficient grounds to refuse to renew Cook's insurance producer license under section 375.141.1(10).
66. The above-described instances are each separate and sufficient grounds upon which the Director may refuse to renew Cook's insurance producer license.
67. The Director has considered Cook's history and all the circumstances surrounding Cook's application. Giving Cook a license would not be in the interest of the public. The Director exercises her discretion to refuse to renew Cook's insurance producer license.

68. This Order is in the public interest.

ORDER

IT IS THEREFORE ORDERED that the Application to renew the insurance producer license of **Tyler J. Cook** is hereby **REFUSED**.

SO ORDERED.

WITNESS MY HAND THIS 10th DAY OF June, 2025.



Angela L. Nelson
ANGELA L. NELSON
DIRECTOR

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NOTICE

TO: Renewal Applicant and any unnamed persons aggrieved by this Order:

You may request a hearing in this matter. You may do so by filing a complaint with the Administrative Hearing Commission of Missouri, P.O. Box 1557, Jefferson City, Missouri, within 30 days after the mailing of this notice pursuant to Section 621.120, RSMo. Pursuant to 1 CSR 15-3.290, unless you send your complaint by registered or certified mail, it will not be considered filed until the Administrative Hearing Commission receives it.

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of June, 2025, a copy of the foregoing Order and Notice was served upon the Renewal Applicant in this matter by certified mail, signature required, at the following address:

Tyler J. Cook
PO Box 482
Crystal City, Mo 63019

Certified No. 7022 2410 0000 2764 5435



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