

## DEPARTMENT OF COMMERCE AND INSURANCE

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

IN RE:

THEDDEUS STYLES,

Renewal Applicant.

)  
)  
)  
)  
)

Case No. 2410040626C

### ORDER REFUSING TO RENEW AN INSURANCE PRODUCER LICENSE

ANGELA L. NELSON, Director of the Missouri Department of Commerce and Insurance ("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 file, the Director issues the following findings of fact, conclusions of law, and order:

### FINDINGS OF FACT

1. Theddeus Styles ("Styles") was a non-resident insurance producer with a business address of record of 7901 4<sup>th</sup> Street North, Suite 16227, St. Petersburg, Florida 33702 and a business phone number of record of (954) 905-2333. His residence address of record is 9410 Live Oak Pl., Apt. 203, Davie, Florida 33324-4710 and residence phone number is (954) 864-7080.
2. Styles was a licensed non-resident insurance producer in Missouri from May 3, 2019 until October 21, 2023, when his non-resident insurance producer license expired. During the 2019-2023 period, Styles renewed his license one time in May, 2021.

3. On April 4, 2024, Styles submitted a late-filed renewal application for a non-resident insurance producer license to the Missouri Department of Commerce and Insurance (“Missouri Department”).
4. During the time Styles held a Missouri license, from May 2019 through October 2023, several other jurisdictions took administrative actions against his insurance licenses.
5. Arkansas took administrative action taken against Styles’ license after his Missouri licensed expired.

**I. Other Department Administrative Actions**

UTAH INSURANCE DEPARTMENT

6. In 2020, the Utah Insurance Department (“Utah Department”) sought revocation of Styles’ Utah license. *Utah Insurance Department v. Styles*, Docket No. 2020-4221 (Before the Utah Insurance Commissioner).
7. On September 2, 2020, the Utah Department issued an order accepting a settlement that Styles would submit to a \$500 forfeiture “for failing to respond promptly to a reasonable written inquiry from the Commissioner (Utah Code § 31A-2-202(4)(a)) and for failing to maintain current contact information with the [Utah] Department (Utah Code § 31A-23a-412(1)).” For its part, the Utah Department agreed to withdraw its request to revoke Styles’ license.
8. Styles did not report the September 2, 2020 action taken by the Utah Department in the NIPR Attachment Warehouse until December 1, 2020, nor did Styles report the Utah Department’s action directly to the Missouri Department.
9. Styles was licensed in Missouri at the time this administrative action was taken by the Utah Department.

ALABAMA DEPARTMENT OF INSURANCE

10. The Alabama Department of Insurance (“Alabama Department”) sent a letter to Styles advising him that it had notice that Mutual of Omaha Insurance Company had terminated Styles’ producer appointment for cause. The Alabama Department requested that Styles provide an explanation of the events and circumstances that purportedly led to the termination of his producer license.

11. Styles emailed a response on August 9, 2020 generally denying the allegations made by Mutual of Omaha.
12. On October 2, 2020, the Alabama Department issued an Order to Show Cause against Styles for failing to adequately respond to inquiries from the Alabama Department. *Alabama Dept. of Ins. v. Theddeus Styles*, Case No. P-2020-130LM (Before the Commissioner of Insurance for the State of Alabama).
13. Styles did not report the October 2, 2020 action taken by the Alabama Department in the NIPR Attachment Warehouse until December 1, 2020, nor did Styles report the Alabama action directly to the Missouri Department.
14. Styles was licensed in Missouri when the Alabama Department undertook this investigation and administrative action.

#### PENNSYLVANIA INSURANCE DEPARTMENT

15. On December 27, 2021, Styles and the Insurance Department of the Commonwealth of Pennsylvania (“Pennsylvania Department”) entered into a Consent Order (the “Pennsylvania Order”) for violations of 40 P.S. §§ 310.11(8), (20), and 310.78(a). *In re Theddeus Styles*, Docket No. 21-12-006 (Before the Insurance Commissioner of the Commonwealth of Pennsylvania).
16. The Pennsylvania Order found as a fact that on September 2, 2020, Styles “signed a settlement agreement with the Utah Department of Insurance, whereby he agreed to pay a \$500.00 financial penalty in lieu of revocation” of his insurance license in Utah. *Id.*
17. The Pennsylvania Order found as a fact that on October 2, 2020, the Alabama Department issued a Show Cause Order to Styles for failing to adequately respond to the Alabama Department. *Id.*
18. The Pennsylvania Order found as a fact that “[b]etween January 4, 2021 and January 22, 2021, the [Pennsylvania] Department made several attempts to contact [Styles] by mail, phone, and e-mail.” *Id.*
19. The Pennsylvania Order found as a fact that on November 19, 2021, during a departmental interview, Styles admitted to late reporting the various administrative actions listed above to the Pennsylvania Department, which reporting was required under Pennsylvania law. *Id.*

20. The Pennsylvania Order required Styles to pay a civil penalty of \$250 and stated that Styles' license in Pennsylvania would be immediately suspended if, after investigation and determination: (1) any terms of the Order had not been complied with, or (2) any confirmed complaint against Styles was determined to be accurate and a statute or regulation had been violated. The Pennsylvania Order remains in effect for five years through December 2026. *Id.*
21. Styles did not report the Pennsylvania Department's December 27, 2021 Consent Order in the NIPR Attachment Warehouse until February 9, 2022, nor did Styles report the Consent order directly to the Missouri Department.
22. Styles was licensed in Missouri at the time this administrative action was taken by the Pennsylvania Department.

#### ILLINOIS DEPARTMENT OF INSURANCE

23. On July 18, 2022, the Department of Insurance of the State of Illinois ("Illinois Department") issued an Order of Revocation of Styles' license (the "Illinois Order"). *In the Matter of the Revocation of Licensing Authority of: Theddeus Styles* (Before the Illinois Department of Insurance).
24. The Illinois Order found that the Illinois Department sent emails to Styles requesting a statement from him regarding his February 19, 2020 termination for cause letter from Mutual of Omaha for applications submitted without the consumers' knowledge.
25. The Illinois Order found that Styles did not respond to these emails and that the Illinois Department also attempted a phone call to Styles but there was no answer.
26. Styles did not report the July 18, 2022 action taken by the Illinois Department in the NIPR Attachment Warehouse until November 22, 2022, nor did Styles report the Illinois Department's action against him directly to the Missouri Department.
27. Styles was licensed in Missouri at the time this administrative action was taken by the Illinois Department.

## NORTH CAROLINA DEPARTMENT OF INSURANCE

28. On September 18, 2023, the North Carolina Department of Insurance (“North Carolina Department”) issued its Final Agency Decision and Order revoking Styles’ non-resident producer’s license. *In the Matter of: The Licensure of Theddeus Styles (NPN #18854952)*, Docket No. 2133 (Before the Commissioner of Insurance, North Carolina Department of Insurance).
29. The North Carolina Department found that Styles failed to inform it that his Illinois Producer License had been revoked for having “demonstrated incompetence and untrustworthiness in [Illinois].”
30. Styles did not report the Illinois revocation as required by Illinois law and this, in turn, violated North Carolina law.
31. When the North Carolina Department began its investigation and attempted to reach Styles, by letter, email, and telephone, it received no response.
32. At the time the North Carolina Department issued its Order, in September 2023, Styles had still not reported the Illinois revocation to the North Carolina Department. *Id.*
33. Styles did not notify the Missouri Department of the North Carolina Decision and Order at the time it occurred or within thirty days of the final disposition.
34. Styles was licensed in Missouri at the time this administrative action was taken by the North Carolina Department.

## ARKANSAS INSURANCE DEPARTMENT

35. On May 16, 2024, after Styles’ non-resident producer license in Missouri had lapsed, the Arkansas Insurance Department (“Arkansas Department”) revoked Styles’ nonresident producer license. *In the Matter of Theddeus Styles*, Order No. 2024-44 (Before the Insurance Commissioner for the State of Arkansas).
36. The Arkansas Department found that Styles’ appointment with Mutual of Omaha was terminated for cause on February 7, 2020 for submitting applications without knowledge of the clients. The Arkansas Department also noted that there had been several administrative actions taken against Styles, none of which had been reported. *Id.*

37. Styles did not notify the Missouri Department of this administrative action at the time it occurred or within thirty days thereafter.
38. It is inferable, and hereby found as fact, that Styles did not disclose the administrative actions in Utah, Alabama, Pennsylvania, Illinois, North Carolina, and Arkansas in order to induce the Director to renew his license in Missouri.

## **II. Missouri Renewal Application**

39. Styles' Missouri non-resident producer license (number 8474650) was issued on May 3, 2019 and expired on October 21, 2023.
40. Styles electronically submitted his renewal application (the "Renewal Application") in Missouri on April 4, 2024.
41. Styles provided a residence address and a business address on the application. He also provided three different emails.
42. Background Question 2 of the Renewal Application asks:

Have you been named or involved as a party in an administrative proceeding, including a FINRA sanction or arbitration proceeding regarding any professional or occupational license or registration, which has not been previously reported to this insurance department? "Involved" means having a license censured, suspended, revoked, canceled, terminated; or, being assessed a fine, placed on probation, sanctioned or surrendering a license to resolve an administrative action. "Involved" also means being named as a party to an administrative or arbitration proceeding, which is related to a professional or occupational, license, or registration. "Involved" also means having a license, or registration, application denied or the act of withdrawing an application to avoid a denial.

43. Styles answered "No" to Background Question 2 on his Renewal Application.
44. The "Attestation" section of the Application reads, in relevant part:

I hereby certify that, under penalty of perjury, all of the information submitted in this application and attachments

is true and complete. I am aware that submitting false information or omitting pertinent or material information in connection with this application is grounds for license revocation or denial of the license and may subject me to civil or criminal penalties.

45. On April 5, 2024, Senior Regulatory Auditor Karen Crutchfield (“Crutchfield”) sent an email to each of the email addresses of record that Styles provided on the Renewal Application. Crutchfield noted in her correspondence that Styles had not disclosed the North Carolina revocation action. She requested that Styles provide documentation and a description of the North Carolina action. Crutchfield also asked Styles to provide a more detailed statement about the Mutual of Omaha activity.
46. Two of the emails sent by Crutchfield were returned as “Undeliverable.” One email was not returned.
47. Styles did not respond to any of Crutchfield’s April 5, 2024 emails.
48. On April 25, 2024, Crutchfield sent an inquiry letter to each of the addresses of record included on the Renewal Application. The letter noted that Styles had not disclosed the North Carolina revocation action. She requested that Styles provide documentation and a description of the North Carolina action. Crutchfield also asked Styles to provide a more detailed statement about Mutual of Omaha terminating his provider appointment. Crutchfield cited 20 CSR 100-4.100(2)(A), which notified Styles that his response was required within twenty days and that failure to respond could result in disciplinary action by the Department.
49. The April 25, 2024 inquiry letter was not returned as undeliverable and is presumed delivered.
50. Styles did not respond to the April 25, 2024 inquiry letter and did not demonstrate reasonable justification for the delay, a violation of 20 CSR 100-4.100(2)(A).
51. On May 29, 2024, Crutchfield sent a second inquiry letter to each of the addresses of record included on the application.
52. The May 29, 2024 inquiry letter was not returned as undeliverable and is presumed delivered.

53. Styles did not respond to the May 29, 2024 inquiry letter and did not demonstrate reasonable justification for the delay, a violation of 20 CSR 100-4.100(2)(A).

### **CONCLUSIONS OF LAW**

54. Section 375.141, RSMo<sup>1</sup> 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:

(1) Intentionally providing materially incorrect, misleading, incomplete or untrue information in the license application;

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

(3) Obtaining or attempting to obtain a license through material misrepresentation or fraud; [or]

\* \* \*

(9) Having an insurance producer license, or its equivalent, denied, suspended or revoked in any other state, province, district or territory[.]

\* \* \*

6. An insurance producer shall report to the director any administrative action taken against the producer in another jurisdiction or by another governmental agency in this state within thirty days of the final disposition of the matter. This report shall include a copy of the order, consent order or other relevant legal documents.

55. Title 20 CSR 100-4.100(2)(A) is one of the Department's regulations. It provides:

---

<sup>1</sup> All civil statutory references are to Revised Statutes of Missouri (2016) unless otherwise indicated.

Upon receipt of any inquiry from the division, every person shall mail to the division an adequate response to the inquiry within twenty (20) days from the date the division mails the inquiry. An envelope's postmark shall determine the date of mailing. When the requested response is not produced by the person within twenty (20) days, this nonproduction shall be deemed a violation of this rule, unless the person can demonstrate that there is reasonable justification for that delay[.]

56. Under Missouri law, when a letter is duly mailed by first class mail, there is a rebuttable presumption that the letter was delivered to the addressee and that the party was properly notified. *Breckle v. Treasurer of the State of Missouri*, 216 S.W.3d 899, 902 (Mo. App. 2017).
57. The dictionary definition of "material" is "having real importance or great consequences[.]" MERRIAM-WEBSTER COLLEGIATE DICTIONARY, 765 (11<sup>th</sup> ed. 2004); *Dir. of Com. and Ins. v. Erica Nichole Mickle*, Mo. Admin. Hrg. Comm'n, Case No. 21-1453 (Sept. 9, 2021).
58. A misrepresentation is material if the Department "acting reasonably and naturally in accord with [its] custom and practice would have relied on the representation." *Smith ex rel. Stephan v. AF&L Ins. Co.*, 147 S.W.3d 767, 774 (Mo. App. 2004).
59. The Director may refuse to renew Styles' non-resident insurance producer license under § 375.141.1(1) because Styles intentionally provided materially incorrect, misleading, incomplete, or untrue information in his Renewal Application by falsely answering "No" to Background Question 2 regarding administrative actions and failing to disclose the administrative actions from Utah, Alabama, Pennsylvania, Illinois, North Carolina, and Arkansas.
60. The Director may refuse to renew Styles' non-resident insurance producer license under § 375.141.1(2) because he violated an insurance law, specifically § 375.141.6, when he failed to report, within thirty days of the final disposition: (a) the administrative action and settlement regarding his Utah license; (b) the administrative action in Alabama that resulted in an Order to Show Cause; (c) the administrative action in Pennsylvania that resulted in a Consent Order against him; (d) the administrative action in Illinois that resulted in an Order of Revocation of his license: (e) the


administrative action in North Carolina that resulted in a Final agency Decision and Order revoking Styles' license; and (f) the administrative action in Arkansas revoking his license on May 16, 2024.

61. Each time Styles violated an insurance law by not timely reporting administrative actions taken against him in other states constitutes sufficient grounds for the Director to refuse to renew Styles' insurance producer license under § 375.141.1(2).
62. The Director may refuse to renew Styles' non-resident insurance producer license under § 375.141.1(3) because he attempted to renew his license through material misrepresentation by answering "No" to Background Question 2 of his Renewal Application when he had been named as a party in at least six administrative actions in other jurisdictions.
63. The Director may refuse to renew Styles' non-resident insurance producer license under § 375.141.1(9) because: (a) his Illinois non-resident insurance producer license was revoked by order of the Illinois Department on July 18, 2022; (b) his North Carolina non-resident insurance producer license was revoked by order of the North Carolina Department on September 18, 2023; and (c) his Arkansas non-resident insurance producer license was revoked by order of the Arkansas Department on May 16, 2024.
64. Each time Styles' license was revoked by a state described in this petition constitutes sufficient grounds for the Director to refuse to renew Styles' insurance producer license under § 375.141.1(9).
65. Given these facts, renewing Styles' insurance producer license would not be in the interest of the public. Accordingly, the Director exercises her discretion to refuse to renew Styles' insurance producer license.
66. This Order is in the public interest.

### **ORDER**

**IT IS THEREFORE ORDERED** that the **Theddeus Styles'** renewal application for a nonresident insurance produce license is **REFUSED**.



  
ANGELA L. NELSON  
DIRECTOR

## **NOTICE**

**TO: 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.

[The remainder of this page is intentionally left blank.]

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of April, 2025, a copy of the foregoing Order and Notice was served upon the applicant in this matter by United Parcel Service (UPS), with signature required, at the following addresses:

Theddeus Styles  
7901 4<sup>th</sup> Street North, Suite 16227  
St. Petersburg, Florida 33702

Tracking No. 1Z0R15W84297849523

*Delivered*

Theddeus Styles  
9410 Live Oak Pl., Apt. 203  
Davie, Florida 33324-4710

Tracking No. 1Z0R15W84295993933

RTS

  
\_\_\_\_\_  
Jackie Keely, Paralegal  
Missouri Department of Commerce  
and Insurance  
301 West High St., Room 530  
Jefferson City, MO 65101  
Telephone: 573.751.2619  
Facsimile: 573.526.5492  
jackie.keely@insurance.mo.gov