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COMMISSION OF INSURANCE
INSURANCE DIVISION OF IOWA

BEFORE THE IOWA INSURANCE COMMISSIONER

IN THE MATTER OF

CHRISTOPHER ROBIN CUNDIFF,
NPN 19004083,
DOB 11/28/XXXX,

Respondent.

) Division Case No. 120694

) **ORDER AND CONSENT TO ORDER**

NOW THEREFORE, upon motion of the Iowa Insurance Division ("Division") and by consent of Respondent Christopher Robin Cundiff, pursuant to Iowa Code chapters 507B—Insurance Trade Practices and Iowa Code chapter 522B—Licensing of Insurance Producers, the Commissioner enters the following Order and Consent to Order ("Consent Order"):

I. PARTIES AND JURISDICTION

1. The Commissioner of Insurance, Douglas M. Ommen, directly and through his designees, administers and enforces Iowa Code 507B—Insurance Trade Practices and Iowa Code chapter 522B—Licensing of Insurance Producers pursuant to Iowa Code § 505.8.
2. Christopher Robin Cundiff ("Cundiff") is an individual with a last-known residential address of 1411 S 7th St, Adel, Iowa 50003.
3. Cundiff is and has been licensed in the state of Iowa as a resident insurance producer since December 28, 2018. Cundiff is licensed under National Producer Number 19004083.
4. Financial Industry Regulatory Authority, Inc.'s ("FINRA") Central Registration Depository ("CRD") contains information associated with Cundiff. Cundiff's CRD number is 6583898. However, Cundiff has not taken any examinations for any FINRA licenses, and, according to CRD records, he was only employed for one day by a FINRA-regulated entity.
5. Pursuant to Iowa Code § 505.28, Cundiff consented to the jurisdiction of the Commissioner of Insurance by committing acts governed by chapter 522B.

6. From on or about September 24, 2020, to present, Cundiff engaged in acts and practices within the state of Iowa constituting cause for probation, suspension, or revocation of Cundiff's insurance producer license; cease and desist orders; and civil penalties or other relief under Iowa Code chapters 505, 507B, 522B, and rules adopted pursuant to these chapters.

II. FINDINGS OF FACT

7. Cundiff applied for a resident insurance producer license with the Division by submitting a Uniform Application for Individual Producer License ("Uniform Application") through the National Insurance Producer Registry. In submitting the Uniform Application, Cundiff designated the Commissioner as an agent for service of process.

8. The Division issued Cundiff a license as a resident insurance producer on December 28, 2018. Cundiff is licensed under National Producer Number 19004083.

9. On January 1, 2019, Cundiff was appointed as a non-captive agent by American Family Life Assurance Company of Columbus ("AFLAC") and employed as a district sales coordinator.

10. AFLAC district sales coordinators are responsible for leading and supporting a diverse sales team of new and veteran insurance professionals; recruiting, training, and developing new insurance agents and producers; working with business owners to provide benefits solutions, enrollment and claims support; building and maintaining relationships with prospects, clients, and brokers; and tracking and analyzing sales activity to ensure quarterly growth goals are achieved.

AFLAC Employee Kristy Stodola

11. On or about August 2020, AFLAC hired Kristy Stodola as an employee. Cundiff was Ms. Stodola's district coordinator. On or about September 2020, Cundiff requested that Ms. Stodola share her AFLAC computer login credentials with him, which she did.

12. AFLAC offers supplemental group insurance policies to companies that those companies can offer to their employees. One of the supplemental policies is a cancer insurance policy. If a company desires to offer these supplemental policies to their employees, the company must register as a business in the AFLAC system through an AFLAC agent utilizing a New Business Transmittal Form.

13. To submit the New Business Transmittal Form to AFLAC, the agent would submit the Federal Employer Identification Number ("EIN") to AFLAC. AFLAC would then verify that it was a real company using the EIN. The AFLAC agent would also have to confirm that the company had at least three employees who would apply for the offered supplemental insurance plan with AFLAC. Once the company was created in the AFLAC system, the company could offer supplemental group policies to their employees, and the employees could apply for coverage under the group policy. If a group policy was issued, the company would pay AFLAC directly for its employees' coverage.

14. In September 2020, Cundiff directed Ms. Stodola to submit AFLAC New Business Transmittal Forms for two companies, MC Real Estate and CM3 LLC ("CM3"). Ms. Stodola was listed as the writing agent and Cundiff was listed as the writing associate in the New Business Transmittal Forms. MC Real Estate is a company owned by Cundiff's wife, Molly Cundiff. CM3 was an insurance company owned by Cundiff. Cundiff told Ms. Stodola that, if she submitted MC Real Estate and CM3 New Business Transmittal Forms to AFLAC, he would give her credit for any policies sold under those two companies so she would qualify for a bonus.

15. Ms. Stodola submitted the forms to AFLAC per Cundiff's direction. She did not have any knowledge of any individual employees being enrolled in policies through MC Real Estate or CM3.

16. On December 21, 2020, an AFLAC New Business Transmittal Form for the company Motivation U was submitted using Ms. Stodola's AFLAC login credentials. Ms. Stodola could not recall if she set up the account for Motivation U or if Cundiff used her login credentials to submit the New Business Transmittal Form for this company to AFLAC. Cundiff owns Motivation U.

Employee Enrollments

17. On September 24, 2020, Cundiff listed Iowa consumer L [REDACTED] T [REDACTED] as an employee of MC Real Estate in the AFLAC system. Ms. T [REDACTED] has never been employed by MC Real Estate.

18. Cundiff then applied for an AFLAC supplemental cancer policy for Ms. T [REDACTED]. Cundiff filled out the application for insurance without Ms. T [REDACTED]'s knowledge or consent. Cundiff submitted the application to AFLAC and paid the initial premium on the policy.

19. The application included questions related to Ms. T [REDACTED]'s medical history and her family's medical history. Cundiff checked "no" for each of these medical history questions without speaking to Ms. T [REDACTED] or providing Ms. T [REDACTED] the ability to review or verify the answers to the questions. Cundiff then electronically signed the application on behalf of Ms. T [REDACTED] with the words "Electronically Signed by LT." Cundiff further affixed Ms. T [REDACTED]'s initials on the application without Ms. T [REDACTED]'s knowledge or consent. Ms. T [REDACTED] never requested insurance coverage or an insurance quote from Cundiff.

20. The application stated that 100% of the commission was payable to Ms. Stodola and 0% payable to Cundiff. Ms. T [REDACTED] was unaware that Cundiff had made payments towards the premium on the policy.

21. On or about November 2021, Cundiff contacted Ms. T [REDACTED] and told her that, if she got any calls from AFLAC HQ or anyone else, she should ignore them.

22. On September 25, 2020, Cundiff submitted an application to AFLAC for supplemental cancer insurance for Iowa consumer M [REDACTED] S [REDACTED] and listed him as an employee of CM3. Mr. S [REDACTED] was never employed by CM3.

23. When the application was submitted, Cundiff was Mr. S [REDACTED]'s brother-in-law. Cundiff then paid the initial premium on the policy. Cundiff answered questions in the application about Mr. S [REDACTED]'s medical history and his family's medical history without his knowledge or the opportunity to review and verify the accuracy of the answers.

24. Cundiff affixed Mr. S [REDACTED]'s digital signature and initials onto the application for insurance without Mr. S [REDACTED]'s knowledge or consent.

25. Mr. S [REDACTED] first learned that a policy was taken out in his name when he received a policy update from AFLAC. The application stated that 100% of the commission was payable to Ms. Stodola and 0% payable to Cundiff. Mr. S [REDACTED] was unaware that Cundiff had made payments towards the premium on the policy.

26. On December 30, 2020, Cundiff listed three employees of Motivation U in the AFLAC system: M [REDACTED] D [REDACTED], S [REDACTED] D [REDACTED], and D [REDACTED] M [REDACTED]. None of these individuals were employed by Motivation U.

27. On December 30, 2020, Cundiff submitted applications for supplemental insurance for S [REDACTED] and M [REDACTED] D [REDACTED] ("The D [REDACTED]s"). The D [REDACTED]s are a married couple that were friends with Cundiff. The D [REDACTED]s were considering getting supplemental insurance from Cundiff and spoke to him about their options. The D [REDACTED]s both filled out applications with Cundiff, but did not submit their applications because they were unsure if they wanted the coverage.

28. Cundiff submitted these applications to AFLAC without the D■■■■s' knowledge or consent and paid the initial premiums on these policies. The D■■■■s did not believe that the applications had been submitted since they never made any payments on the policies. The D■■■■s did not know that Cundiff listed them as employees of Motivation U on their applications for insurance. The D■■■■s stated that they had never heard of Motivation U before. The applications stated that 100% of the commission for their individual policies was payable to Cundiff. Cundiff received \$222.28 for S■■■■'s policy, and \$175.29 for M■■■■'s policy.

29. On December 30, 2020, Ms. M■■■■ filled out an application for a supplemental insurance policy with Cundiff. Ms. M■■■■ reviewed the application prior to it being submitted and signed it. Cundiff told Ms. M■■■■ that if she submitted the application, he would pay the premium on the policy for the first few months as payment for babysitting for Cundiff's children.

30. Cundiff made at least one payment towards the premium on Ms. M■■■■'s policy. Once Cundiff stopped making payments, the policy was canceled for nonpayment. Ms. M■■■■ never paid any premiums on the policy. Ms. M■■■■ did not know that she was listed as an employee of Motivation U. The application stated that 100% of the commission was payable to Cundiff. Cundiff received \$175.29 in commission on this policy.

31. On each application submitted to AFLAC, the application contained the attestation, "I certify that I personally saw the Proposed Insured when the application was written, and each question was asked of the Proposed Insured and answered as recorded. All answers above are correct to the best of my knowledge." Cundiff electronically signed this attestation on each consumers' application.

32. Cundiff did not tell AFLAC that these three companies were owned by either his wife or himself.

33. Cundiff received multiple bonuses based on the fraudulent policies and new company accounts being created. Cundiff's supervisor, Howard Eaton, additionally received qualifications and bonuses based on this conduct. AFLAC clawed back the bonuses and commissions that were improperly paid to Cundiff, Cundiff's supervisor, and Ms. Stodola. In total AFLAC clawed back \$11,700.08 in bonuses from Cundiff, \$5,400.00 in bonuses from Ms. Stodola, and \$6,275.75 in bonuses from Mr. Eaton.

34. Cundiff stated to an investigator from the Division's Fraud Bureau that he applied for all of the above-mentioned policies as gifts to the consumers named in the applications. Further, Cundiff stated that he would pay the first month's policy premium, and if the consumer desired to keep the policy, the consumer could continue to pay the monthly premium.

Criminal Charges

35. On June 6, 2023, a criminal complaint was filed against Cundiff in Dallas County, Iowa. A preliminary hearing took place on July 17, 2023. Cundiff was charged with seven counts, including three counts of insurance fraud, a Class D Felony; two counts of forgery, an aggravated misdemeanor; and two counts of identity theft, an aggravated misdemeanor.

36. On October 20, 2023, Cundiff pled guilty to one count of identity theft under \$1,500.00 and one count of forgery, both aggravated misdemeanors. Cundiff received a sentence of two years in prison for both counts, which was suspended, and two years of probation. Cundiff was further ordered to pay \$855.00 for each count, for a total of \$1,710.00. Cundiff presently has a tentative discharge date of November 17, 2025 to complete his probation.

37. To date, Cundiff has not reported his arrest, prosecution, or conviction to the Division, nor has he provided copies of the initial criminal complaint, the order resulting from the criminal proceedings, or any other relevant legal documents related to his criminal prosecution.

III. CONCLUSIONS OF LAW

COUNT I

Using Fraudulent, Coercive, or Dishonest Practices or Demonstrating Incompetence, Untrustworthiness

38. Under Iowa Code § 522B.11(1)(h), a license may be subject to probation, suspension, or revocation and civil penalties may be levied as provided in Iowa Code § 522B.17, for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business.

39. Cundiff used fraudulent or dishonest practices and/or demonstrated incompetence or untrustworthiness when Cundiff supplied false or untrue information on at least five insurance applications stating the individuals were employed by companies that they were not employed by.

40. Cundiff's convictions for identity theft and forgery demonstrate Cundiff's use of fraudulent or dishonest practices and/or his untrustworthiness or incompetence.

41. Cundiff used fraudulent or dishonest practices and/or demonstrated incompetence or untrustworthiness when Cundiff submitted unverified medical information on applications for insurance.

42. Cundiff used fraudulent or dishonest practices and/or demonstrated incompetence or untrustworthiness when Cundiff digitally signed the attestations on the insurance applications even though he had not personally seen the proposed insureds when the applications were written, and each consumer was not asked each question on the application.

43. Cundiff's acts and practices violated Iowa Code § 522B.11(1)(h) subjecting Cundiff to probation, suspension, or revocation of Cundiff's insurance producer license, the imposition of a civil penalty, an order requiring Cundiff to cease and desist from engaging in such acts and

practices, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

COUNT II
Forgery on an Application for Insurance

44. Under Iowa Code § 522B.11(1)(j), a license may be subject to probation, suspension, or revocation and civil penalties may be levied, as provided in Iowa Code § 522B.17, for forging another's name to an application for insurance or to any document related to an insurance transaction.

45. Cundiff forged M ■ S ■'s and L ■ T ■'s electronic signatures on applications for insurance and submitted those applications to AFLAC for supplemental cancer policies. AFLAC relied upon the application signatures to issue policies to the consumers. AFLAC further relied upon the forged signatures and initials to determine that the medical and health questions had been correctly answered by the consumer.

46. Cundiff pled guilty to criminal forgery related to the application for insurance for L ■ T ■.

47. Cundiff's acts and practices violated Iowa Code § 522B.11(1)(j) subjecting Cundiff to probation, suspension, or revocation of Cundiff's insurance producer license, the imposition of a civil penalty, an order requiring Cundiff to cease and desist from engaging in such acts or practices, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

COUNT III
Unfair Trade Practices

48. Under Iowa Code § 507B.4(3) “a person shall not engage in this state in any trade practice which is defined in this chapter as, or determined pursuant to section 507B.6 to be, an unfair method of competition, or an unfair or deceptive act or practice in the business of insurance.”

49. Iowa Code § 507B.4(3)(n) includes as an unfair trade practice “making false or fraudulent statements or representations on or relative to an application for an insurance policy, for the purpose of obtaining a fee, commission, money, or other benefit from any insurer, agent, broker, or individual.”

50. Cundiff engaged in an unfair trade practice when he directed one of his subordinates to submit three New Business Transmittal Forms to AFLAC and did not disclose that Cundiff or his wife owned the companies named on those forms.

51. Cundiff engaged in an unfair trade practice when he submitted two applications for insurance without confirming any of the health questions with the consumer and not providing the consumer with an opportunity to review the application for accuracy and completeness prior to filing. Cundiff received commissions and award bonuses on these policies.

52. Cundiff engaged in an unfair trade practice when he submitted applications for insurance for each of the D■■■■s without their knowledge or consent.

53. Cundiff’s acts and practices violated Iowa Code § 507B.3 subjecting Cundiff to suspension or revocation of Cundiff’s insurance producer license, the imposition of a civil penalty, an order requiring Cundiff to cease and desist from engaging in such acts or practices, the imposition of costs of the investigation and prosecution of the matter, and any other

corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 505.8 and 507B.7.

COUNT IV
Failure to Report Criminal Prosecution

54. Iowa Code § 522B.16(2) and Iowa Administrative Code 191—10.20(4)(b) require that, “within thirty days of the initial pretrial hearing date, an insurance producer shall report to the commissioner any criminal prosecution of the insurance producer taken in any jurisdiction.”

55. On June 6, 2023, Cundiff was criminally charged in Dallas County, Iowa. A preliminary hearing was held on July 17, 2023.

56. Cundiff failed to report the prosecution to the Division within thirty days of the initial pretrial hearing date and has not done so as of the date of the filing.

57. Cundiff’s acts and practices violated Iowa Code § 522B.16(2) and Iowa Administrative Code rule 191-10.20(4)(b), subjecting Cundiff to probation, suspension, or revocation of Cundiff’s insurance producer license, the imposition of a civil penalty, an order of restitution, an order requiring Cundiff to cease and desist from engaging in such acts and practices, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.17 and 505.8.

IV. ORDER

WHEREFORE, IT IS ORDERED pursuant to the powers granted to the Commissioner of Insurance by Iowa Code chapters 507B and 522B:

- A. Cundiff's Iowa resident insurance producer license is suspended for 12 months beginning October 1, 2025, pursuant to Iowa Code §§ 507B.7, 522B.11 and 522B.17;
- B. Cundiff, pursuant to Iowa Code §§ 507B.7 and 522B shall throughout his suspension period, cease and desist from engaging in the business of insurance in the state of Iowa;
- C. Cundiff shall, prior to the end of the 12-month suspension, pay a civil penalty in the amount of \$4,000.00 pursuant to Iowa Code §§ 505.8, 507B.7, 522B.11, and 522B.17. Payment shall be made payable to the Iowa Insurance Division, to be credited to the Iowa Enforcement Fund to provide funds for insurance enforcement and education;
- D. Cundiff shall, prior to the end of the 12-month suspension, pay the amount of \$880.00 for costs of prosecution pursuant to Iowa Code § 505.8. Payment shall be made payable to the Iowa Insurance Division, to be credited to the Iowa Enforcement Fund to provide funds for insurance enforcement and education; and
- E. These orders may be enforced under Iowa Code chapters 507B and 522B, including but not limited to Iowa Code § 507B.8 and 522B.17(3), and additionally, by any collection remedies available to the State of Iowa Department of Revenue for unpaid penalties and other ordered monetary amounts.

SO ORDERED on the 9th day of September, 2025.


DOUGLAS M. OMMEN
Iowa Insurance Commissioner

Respectfully submitted,


Zebulon Black

Iowa Insurance Division
1963 Bell Avenue, Suite 100
Des Moines, Iowa 50315
(515) 654-6564
Zebulon.Black@iid.iowa.gov
ATTORNEY FOR THE DIVISION

Copy to:

Christopher Robin Cundiff
1411 S 7th St
Adel, IA 50003-2508
RESPONDENT

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause, or their attorney, at their respective addresses disclosed on the pleadings on September 9, 2025.

By: ☒ First Class Mail ☐ Personal Service
☒ Restricted certified mail, return receipt ☒ Email, by consent
☐ Certified mail, return receipt ☐ _____

Signature: Brooke Hohn
Brooke Hohn

NOTICE OF PENALTIES FOR WILLFUL VIOLATION OF THIS ORDER

YOU ARE NOTIFIED that acting as an insurance producer, as defined in Iowa Code chapter 522B, in violation of this Order, is a felony under Iowa Code § 507A.10, subjecting you to punishment of imprisonment, jail, fines, or any combination of custody and fines.

YOU ARE ALSO NOTIFIED that if you violate this Order, you may be subject to administrative and civil penalties pursuant to Iowa Code § 522B.17(3). The Commissioner may petition the district court to hold a hearing to enforce the order as certified by the Commissioner. The district court may assess a civil penalty against you in an amount not less than three thousand dollars but not greater than ten thousand dollars for each violation and may issue further orders as it deems appropriate.

NOTICE REGARDING REISSUANCE

Upon entry of this Order, your insurance producer license will become inactive due to suspension. While your license is inactive, you are prohibited from conducting the business of insurance. Your license will not be active until the Division makes the determination to reissue your insurance producer license by order pursuant to Iowa Administrative Code rule 191—10.10.

Reissuance of your insurance producer license is subject to the discretion of the Commissioner. Additionally, reissuance will not be granted unless and until you have complied with the terms of this Order, made the appropriate Application for Reissuance with the Division, and paid all applicable fees. If applicable, you may also be required to apply for licensure through the National Insurance Producer Registry (NIPR) and pay all applicable fees.

NOTICE OF FINAL ORDER IMPACT

A final order of suspension or a cease and desist order may adversely affect other existing business or professional licenses and may result in license revocation or disciplinary action.

A final order in an administrative action does not resolve any potential criminal or civil violations or causes of action that might arise from the same or similar conduct that is the subject of this order. It may result in criminal law enforcement authorities, including the fraud bureau of the Iowa Insurance Division, pursuing a criminal investigation or prosecution of potential criminal law violations.

CONSENT TO ORDER AND AGREEMENT

I, Christopher Robin Cundiff, Respondent in this matter, have read, understood, and do knowingly consent to this Order in its entirety. I understand and acknowledge I have the right to consult with an attorney on this matter if I choose to do so, and I acknowledge that the Division cannot provide me an attorney, nor can the Division provide me legal advice. By executing this Consent, I understand that I am waiving my rights to a hearing, to confront and cross-examine witnesses, to produce evidence, and to judicial review.

I further understand this Order is considered a final administrative action that will be reported by the Division to the National Association of Insurance Commissioners and to other regulatory agencies. I also understand this Order is a public record under Iowa Code chapter 22 and information may be shared with other regulatory authorities or governmental agencies pursuant to Iowa Code § 505.8(8)(d). I also understand this Order will be posted to the Division's website, and a notation will be made to the publicly available website record that administrative action has been taken against me.



Christopher Robin Cundiff, Respondent

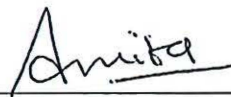
8/29/25

Date

1411 S 7TH ST ADEL IA 50003

Address of Signatory

Subscribed and sworn before me by CHRISTOPHER on this 29th day of Aug., 2025.
CUNDIFF



Notary Public for the State of Iowa

