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Attorneys for Idaho Department of Insurance

FILED

MAY 19 2025

Department of Insurance
State of Idaho

Before the Director of the Department of Insurance

State of Idaho

Idaho Department of Insurance,

Complainant,

vs.

Tyger Jay Richman, an individual
holding Idaho Resident Insurance
Producer License No. 19553261,

Respondent.

Docket No. 18-4444-24

Order of Default

The Director of the Idaho Department of Insurance (“Director”) having reviewed the record herein; and Tyger Jay Richman (“Richman”) who currently holds Idaho Resident Insurance Producer License No. 19553261, having been lawfully served the Verified Complaint and Notice of Right to Hearing (“Complaint”), a copy of which is attached hereto as Exhibit A and incorporated herein, and, as evident

from the Affidavit of Michael Witry, having failed to file an answer thereto and having failed to request a hearing regarding said Complaint; and the Director having found as a result thereof that Richman is in default and has waived his rights regarding the opportunity for hearing; and in consideration of the above;

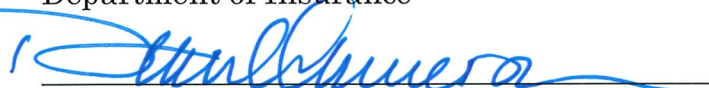
It is hereby ordered that Idaho Resident Insurance Producer License No. 19553261 issued to Tyger Jay Richman is revoked effective immediately;

It is further ordered that Richman shall not be issued a new license under title 41, Idaho Code, for a period of five (5) years after which time, in the event Richman seeks a new license, Richman must petition and show good cause why the prior revocation should not be deemed a bar to the issuance of a new license;

It is further ordered that Richman shall pay to the Idaho Department of Insurance an administrative penalty of fifteen thousand dollars (\$15,000).

Dated this 19th day of May 2025.

State of Idaho
Department of Insurance



Dean L. Cameron
Director

Notification Regarding Reportable Proceedings

This is considered a reportable administrative proceeding. As such, it is a public record and is public information that may be disclosed to other states and reported to companies by which you are actively appointed. This information will be reported to the National Association of Insurance Commissioners (NAIC) and will appear in the online searchable database of the Idaho Department of Insurance.

Notification of Rights

This is a final order of the agency. Any party may file a motion for reconsideration of this final order within fourteen (14) days of the service date of this order. The agency will dispose of the motion for reconsideration within twenty-one (21) days of its receipt, or the motion will be considered denied by operation of law. *See Idaho Code § 67-5246(4).*

Any such motion for reconsideration shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director
Idaho Department of Insurance
700 W. State Street, 3rd Floor
P.O. Box 83720
Boise, ID 83720-0043

Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order or orders previously issued in this case may file a petition for judicial review in the district court of the county in which: (1) a hearing was held; or (2) the final agency action was taken; or (3) the party seeking review of the order resides or operates its principal place of business in Idaho; or (4) the real property or personal

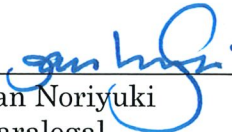
property that was the subject of the agency action is located.

A petition for judicial review must be filed within twenty-eight (28) days of: (a) the service date of this final order; (b) the service of an order denying motion for reconsideration; or (c) the failure within twenty-one (21) days to grant or deny a motion for reconsideration, whichever is later. *See Idaho Code § 67-5273.* The filing of a petition for judicial review does not itself stay the effectiveness or enforcement of the order under appeal. *See Idaho Code § 67-5274.*

Certificate of Service

I hereby certify that on this 19th day of May 2025, I caused a true and correct copy of the foregoing Order of Default to be served upon the following parties by the designated means:

Tyger Jay Richman 430 Fairmont Ave Pocatello, ID 83201-3807	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email: richman1pros@gmail.com
Humana Insurance Co. PO Box 740036 Louisville, KY 40201-7436	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Email:
Regence Blueshield of Idaho, Inc. ATTN: Finance 200 SW Market St, 11 th Floor Portland, OR 97201	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Email:
SelectHealth, Inc. 5381 Green St Murray, UT 84123	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Email:
Transamerica Life Ins. Co. 6400 C Street SW Cedar Rapids, IA 52499	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Email:



Jan Noriyuki
Paralegal

RAÚL R. LABRADOR
Attorney General

Michael Witry—I.S.B. No. 7960
Deputy Attorney General
Idaho Department of Insurance
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Department of Insurance
State of Idaho

Attorneys for Idaho Department of Insurance

Before the Director of the Department of Insurance

State of Idaho

Idaho Department of Insurance,

Complainant,

vs.

Tyger Jay Richman, an individual
holding Idaho Resident Producer License
No. 19553261

Respondent.

Docket No. 18-4444-24

**Verified Complaint and Notice
of Right to Hearing**

Comes now the staff of the Idaho Department of Insurance (“Department”), by and through its undersigned counsel, Michael Witry, Deputy Attorney General, and does hereby give notice of verified allegations constituting violation(s) of Idaho law, notice that relief will be requested from the Director of the Department, and a notice

EXHIBIT

A

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of the right to contest the allegations and requested relief herein and right to hearing to:

**Tyger Jay Richman
Idaho Resident Producer License No. 19553261**

The Department alleges the following facts and violations of title 41, Idaho Code, as itemized below. The Department will present an order seeking the relief described below upon twenty-one (21) days following service of this Verified Complaint, and Tyger Jay Richman are further notified of his right to object to the requested relief, including the basis for any objection, and to request a hearing in writing.

Jurisdiction

1. Jurisdiction in this matter is founded in the Idaho Insurance Code, Idaho Code § 41-101 et seq., including Idaho Code § 41-210, which authorizes the Director of the Department of Insurance (“Director”) to enforce the provisions of title 41 of the Idaho Code, including those governing Respondent’s activities as an insurance producer.

2. Jurisdiction is further founded in Idaho Code § 41-213, which authorizes the Department to institute such proceedings as deemed necessary for the enforcement of any provision of the Idaho Insurance Code including, but not limited to, license revocation and the imposition of administrative penalties.

Respondents

3. Tyger Jay Richman (hereinafter “Richman”) was an Idaho resident during all pertinent times as alleged herein. He carries Idaho Resident Producer

License No. 19553261. He was licensed as a Non-Resident Producer from May 25, 2021, until August 30, 2021. His Resident Producer License was effective on August 30, 2021, and is set to expire on May 31, 2025.

Controlling Law

4. Idaho Code § 41-1016(1) provides that the Director may suspend, revoke or refuse to issue or renew a producer's license and may impose an administrative penalty up to one thousand dollars (\$1,000), if the Director finds that any of the causes or violations set forth in subsections 41-1016(1)(a) through (o) exist, including specifically subsections (e) and (h), which prohibit:

(e) Misrepresenting the terms of an actual or proposed insurance contract or application for insurance or misrepresenting any fact material to any insurance transaction or proposed transaction;

...

(h) Using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss to the public or others, in the conduct of business in this state or elsewhere;

...

5. Idaho Code § 41-117 provides that each instance of violation may be considered a separate offense.

6. Pursuant to Idaho Code § 41-1026(3), the Director shall not issue a license under title 41, Idaho Code, to any person whose license has been revoked until after the expiration of not less than one (1) year to a maximum of five (5) years and, upon a former licensee's application for re-licensure, the Director may require the former licensee "to show good cause why the prior revocation ... shall not be deemed a bar to the issuance of a new license."

Count I

7. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

8. On or about August 25, 2021, Richman submitted an application to American Family Life Assurance Company of Columbus for the insured C.R. This application was for a \$50,000 life insurance policy that carried the policy number P0Y3F130.

9. This application purported to be signed electronically by C.R.

10. C.R. did not actually sign this application, electronically or otherwise.

11. C.R. did not authorize Richman to submit this application on her behalf.

12. Richman knew, or should have known, that C.R. did not sign this application, electronically or otherwise.

13. Richman violated Idaho Code § 41-1016(1)(e) by misrepresenting facts material to an insurance transaction, namely, that C.R. signed the application for policy number P0Y3F130.

14. Richman violated Idaho Code § 41-1016(1)(h) by using fraudulent and dishonest practices and demonstrating untrustworthiness by submitting an application for insurance containing a signature that he knew, or should have known, was false.

Count II

15. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

16. On or about August 26, 2021, Richman submitted an application to American Family Life Assurance Company of Columbus for the insured C.R. This application was for a cancer indemnity policy that carried the policy number P0Y3G5P4.

17. This application purported to be signed electronically by C.R.

18. C.R. did not actually sign this application, electronically or otherwise.

19. C.R. did not authorize Richman to submit this application on her behalf.

20. Richman knew, or should have known, that C.R. did not sign this application, electronically or otherwise.

21. This application was accompanied by an Authorization to Obtain Information form that would allow American Family Life Assurance Company of Columbus to obtain health information about C.R.

22. This authorization purported to be signed electronically by C.R.

23. C.R. did not actually sign this authorization, electronically or otherwise.

24. C.R. did not authorize Richman to submit this authorization on her behalf.

25. Richman knew, or should have known, that C.R. did not sign this authorization, electronically or otherwise.

26. Richman violated Idaho Code § 41-1016(1)(e) by misrepresenting facts material to an insurance transaction, namely, that C.R. signed the application for policy number P0Y3G5P4.

27. Richman violated Idaho Code § 41-1016(1)(e) by misrepresenting facts material to an insurance transaction, namely, that C.R. signed the Authorization to Obtain Information.

28. Richman violated Idaho Code § 41-1016(1)(h) by using fraudulent and dishonest practices and demonstrating untrustworthiness by submitting an application for insurance and an information release form containing signatures that he knew, or should have known, were false.

Count III

29. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

30. On or about August 26, 2021, Richman submitted a document captioned Premium Deduction Authorization/Waiver of Participation to C.R.'s employer. This document authorized American Family Life Assurance Company of Columbus to deduct premium payments for policy number P0Y3G5P4 from C.R.'s paycheck.

31. C.R. did not authorize Richman to submit this document on her behalf.

32. Richman knew, or should have known, that C.R. did not authorize him to submit this document on her behalf.

33. Richman violated Idaho Code § 41-1016(1)(e) by misrepresenting facts material to an insurance transaction, namely, that C.R. authorized him to deduct premium payments for policy number P0Y3G5P4 from C.R.'s paycheck.

34. Richman violated Idaho Code § 41-1016(1)(h) by using fraudulent and dishonest practices and demonstrating untrustworthiness by submitting a document to C.R.'s employer on her behalf that she had not authorized him to submit.

Count IV

35. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

36. On or about November 1, 2021, Richman submitted an application to American Family Life Assurance Company of Columbus for the insured C.R. This application was for a \$30,000 life insurance policy that carried the policy number P0Y68325.

37. This application purported to be signed electronically by C.R.

38. C.R. did not actually sign this application, electronically or otherwise.

39. C.R. did not authorize Richman to submit this application on her behalf.

40. Richman knew, or should have known, that C.R. did not sign this application, electronically or otherwise.

41. Richman violated Idaho Code § 41-1016(1)(e) by misrepresenting facts material to an insurance transaction, namely, that C.R. signed the application for policy number P0Y68325.

42. Richman violated Idaho Code § 41-1016(1)(h) by using fraudulent and dishonest practices and demonstrating untrustworthiness by submitting an application for insurance containing a signature that he knew, or should have known, was false.

Count V

43. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

44. On or about November 1, 2021, Richman submitted an application to American Family Life Assurance Company of Columbus for the insured S.C. This application was for a \$50,000 life insurance policy that carried the policy number POY683H4.

45. This application purported to be signed electronically by S.C.

46. S.C. did not actually sign this application, electronically or otherwise.

47. S.C. did not authorize Richman to submit this application on his behalf.

48. Richman knew, or should have known, that S.C. did not sign this application, electronically or otherwise.

49. Richman violated Idaho Code § 41-1016(1)(e) by misrepresenting facts material to an insurance transaction, namely, that S.C. signed the application for policy number POY683H4.

50. Richman violated Idaho Code § 41-1016(1)(h) by using fraudulent and dishonest practices and demonstrating untrustworthiness by submitting an application for insurance containing a signature that he knew, or should have known, was false.

Count VI

51. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

52. On or about November 1, 2021, Richman submitted an application to American Family Life Assurance Company of Columbus for the insured S.C. This application was for a \$50,000 life insurance policy that carried the policy number P0Y683H5.

53. This application purported to be signed electronically by S.C.

54. S.C. did not actually sign this application, electronically or otherwise.

55. S.C. did not authorize Richman to submit this application on his behalf.

56. Richman knew, or should have known, that S.C. did not sign this application, electronically or otherwise.

57. Richman violated Idaho Code § 41-1016(1)(e) by misrepresenting facts material to an insurance transaction, namely, that S.C. signed the application for policy number P0Y683H5.

58. Richman violated Idaho Code § 41-1016(1)(h) by using fraudulent and dishonest practices and demonstrating untrustworthiness by submitting an application for insurance containing a signature that he knew, or should have known, was false.

Count VII

59. All of the foregoing paragraphs are realleged and incorporated herein as though set forth in full.

60. On or about November 1, 2021, Richman submitted an application to American Family Life Assurance Company of Columbus for the insured J.S. This application was for an accident-only policy that carried the policy number P0Y684K7.

61. This application purported to be signed electronically by J.S.
62. J.S. did not actually sign this application, electronically or otherwise.
63. J.S. did not authorize Richman to submit this application on his behalf.
64. Richman knew, or should have known, that J.S. did not sign this application, electronically or otherwise.
65. Richman violated Idaho Code § 41-1016(1)(e) by misrepresenting facts material to an insurance transaction, namely, that J.S. signed the application for policy number POY684K7.
66. Richman violated Idaho Code § 41-1016(1)(h) by using fraudulent and dishonest practices and demonstrating untrustworthiness by submitting an application for insurance containing a signature that he knew, or should have known, was false.

Prayer for Relief

Based on the foregoing facts and allegations, the Department prays for relief as follows:

1. For an Order revoking Tyger Jay Richman's Idaho Resident Producer License No. 19553261, and providing that Richman shall not be issued a new license under title 41, Idaho Code, for a period of five (5) years after which time, in the event Richman seeks a new license, Richman must petition and show good cause why the prior revocation should not be deemed a bar to the issuance of a new license; and
2. For an Order imposing an administrative penalty against Richman in the amount of \$1,000 for each violative act as alleged herein in such total number as

shall be proven at hearing, but, in the event of a default, an amount not less than Fifteen Thousand Dollars (\$15,000), which represents \$1,000 per violation of title 41, Idaho Code, as alleged herein; and

3. For such other and further relief as the Director deems just and necessary under the circumstances.

Notification of Rights

To: Tyger Jay Richman, the above-named Respondent:

Pursuant to Idaho Code § 41-232A, you have the right to a hearing on this matter. In order to exercise this right, a written request for a hearing must be filed and served upon the Department within twenty-one (21) days after service of this Complaint. Failure to file and serve a written request for a hearing upon the Department within the 21-day time period shall be deemed a waiver of the opportunity for a hearing and to contest the allegations in the Complaint, pursuant to Idaho Code § 41-232A(2). If you fail to submit a timely written response to the allegations within 21 days of the service of this Complaint, a final order will be entered imposing the relief described above.

Any written request for a hearing shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

A copy shall also be provided to the Department's counsel in this matter at the following address:

Michael Witry
Deputy Attorney General
Idaho Department of Insurance
P.O. Box 83720
Boise, ID 83720-0043

In lieu of a hearing, this matter may be resolved by negotiation, stipulation, agreed settlement, or consent order, pursuant to Idaho Code § 67-5241(1)(c). Should

you wish to discuss these options, please contact the undersigned deputy attorney general.

Dated this 24th day of April, 2025.

State of Idaho
Office of the Attorney General



Michael Witry
Deputy Attorney General
Attorneys for Idaho Department of Insurance

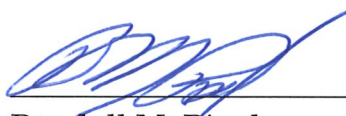
Verification

State of Idaho)
 : ss.
County of Ada)

Randall M. Pipal, Bureau Chief of the Consumer Services Bureau of the Department of Insurance, State of Idaho, being first duly sworn, deposes and says:


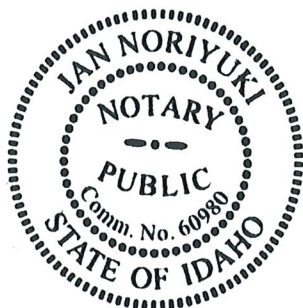
I have read the foregoing Verified Complaint and Notice of Right to Hearing and know the contents thereof and the same are true to the best of my knowledge and belief.

Dated this 24th day of April, 2025.



Randall M. Pipal
Bureau Chief
Consumer Services Bureau

Subscribed and sworn to before me the undersigned Notary Public of Idaho this 24th day of April, 2025.



Notary Public for Idaho
My Commission Expires 01-28-2031

Certificate of Service

I hereby certify that on this 24th day of April, 2025, I caused a true and correct copy of the foregoing Verified Complaint and Notice of Right to Hearing to be served upon the following by the designated means:

Tyger Jay Richman 430 Fairmont Ave Pocatello, ID 83201-3807	<input checked="" type="checkbox"/> first class mail <input type="checkbox"/> certified mail <input type="checkbox"/> hand delivery <input type="checkbox"/> facsimile <input checked="" type="checkbox"/> email: richman1pros@gmail.com
Humana Insurance Co. PO Box 740036 Louisville, KY 40201-7436	<input checked="" type="checkbox"/> first class mail <input type="checkbox"/> certified mail <input type="checkbox"/> hand delivery <input type="checkbox"/> facsimile <input type="checkbox"/> email:
Regence Blueshield of Idaho, Inc. ATTN: Finance 200 SW Market St, 11 th Floor Portland, OR 97201	<input checked="" type="checkbox"/> first class mail <input type="checkbox"/> certified mail <input type="checkbox"/> hand delivery <input type="checkbox"/> facsimile <input type="checkbox"/> email:
SelectHealth, Inc. 5381 Green St Murray, UT 84123	<input checked="" type="checkbox"/> first class mail <input type="checkbox"/> certified mail <input type="checkbox"/> hand delivery <input type="checkbox"/> facsimile <input type="checkbox"/> email:
Transamerica Life Ins. Co. 6400 C Street SW Cedar Rapids, IA 52499	<input checked="" type="checkbox"/> first class mail <input type="checkbox"/> certified mail <input type="checkbox"/> hand delivery <input type="checkbox"/> facsimile <input type="checkbox"/> email:



Jan Noriyuki
Paralegal