

This guide contains a listing, although not exhaustive, of categorized indicators of potential fraud. Although categorized, any and/or all may be identified in various stages of the case file. Instinct and good judgment should be exercised when identifying a red flag as one single incident may not be an indicator of fraud. All cases of suspected fraud involving producers, applications, underwriting, STOLI/IOLI, or claims must be reported to Compliance by completing and submitting the Request for Compliance Review (RFCR) form. Please reference the applicable fraud code(s). All internal incidences of suspected fraud should be reported to Athene SafeCall at 1-855-339-2821.

Code

## **100 PRODUCER**

- 101 Producer involved in transaction with no vested interest (not an insured, beneficiary, or applicant)
- 102 Producer paying with cash
- 103 Applicant and/or insured appear to be fictitious
- 104 Forgery by producer
- 105 Misleading or deceptive advertising
- 106 Payment made by producer where producer is not the owner or insured
- 107 Payment by producer and use of multiple accounts
- 108 Impersonation of a contract owner or other party by the producer
- 109 Producer and the contract owner have the same mailing address/telephone number and are not a close family member
- 110 Producer listed on Power of Attorney documents of a contract owner and is not a close family member
- 111 Application appears to be altered
- 112 Application was sent for e-signature delivery; however, the electronic mail address and/or IP address is not registered to the city/state in which the owner resides

## **200 NEW BUSINESS/POLICYHOLDER SERVICES**

- 201 Application signed by someone other than the applicant or without the applicant being present
- 202 Applied for coverage just below the medical limits
- 203 Avoids telephone, e-mail, or postal mail; limited to no contact
- 204 Coverage is beyond apparent means (financial difficulty, level of income, mode of living, etc.)
- 205 Coverage with multiple carriers (trial applications)
- 206 Fictitious identification documentation (driver's license, Social Security Number, etc.)
- 207 History of injury or disability claims
- 208 Medical records submitted by someone other than a physician
- 209 Misrepresentations (medical, date of birth, driving/smoking habits, criminal history, weight, income, employment etc.)
- 210 Multiple addresses and/or the address is a strip mall, Bitcoin ATM, or commercial location
- 211 Premium paid in cash or by someone other than the applicant or insured
- 212 Reluctant to submit to a medical exam or fails to keep appointments
- 213 Unusual action (no contact, not returning calls, threats, aggressive, unusually familiar with insurance lingo/legal language)
- 214 Identity Theft/ Financial Identity Theft - Account Take Over
- 215 Impersonation of owner by someone other than the producer
- 216 Financial Exploitation - isolation, mental or physical disabilities, lack of familiarity with financial matters
- 217 Voice over internet use
- 218 Call originates from a foreign country
- 219 Telephone number is registered to a business, and the caller claims to be an individual customer
- 220 Bank routing number does not correspond with the city and state where the owner resides
- 221 Voided check provided with EFT form appears to be fraudulent/counterfeit
- 222 Instruction to send funds to an alternate address
- 223 Signature does not match the application
- 224 Electronic mail (e-mail) address provided to Athene does not look like a personal e-mail address
- 225 Withdrawal request with no regard for penalties. Owner states before the prize/lottery winnings can be claimed, a processing fee or taxes have to be paid first

- 226 Withdrawal request with no regard for penalties. Owner states he/she is involved in an online romantic relationship, and funds are needed for the individual to visit the U.S. or some other purpose (Romance Scam)
- 227 Withdrawal or surrender requested to be sent via wire transfer to foreign parties
- 228 Address/telephone number changed and immediately followed by a withdrawal, surrender and/or change in banking information
- 229 Altered or washed check
- 230 Identity Theft (not ATO)
- 231 Withdrawal request with no regard for penalties. Owner states he/she is involved in an online romantic relationship, and funds are needed for the U.S. Soldier's various false service-related needs. (Soldier Scam)
- 232 GIACT results are a decline
- 233 Withdrawal request with no regard for penalties. Owner states to settle a debt, gift cards must be purchased and given to a third-party
- 234 Counterfeit check
- 235 Uncooperative and/or unwilling to provide authorization for the release of information

### **300 STOLI/IOLI (Stranger/Investor Owned Life Insurance)**

- 301 Applicant has been offered a cash advance or consideration as an inducement to purchase the policy
- 302 Applicant has been offered "free insurance"
- 303 Applicant has entered into a finance arrangement for a life settlement or with a third-party investor prior to or in with applying for the life insurance policy
- 304 Presence of a preconceived plan to sell or assign the policy
- 305 Evidence policy premiums are being financed; (planned large premium based on finances)
- 306 Unusual or unexplainable terms in any written agreements (for example trust documents for premium financing arrangements)
- 307 Unusual conditions surrounding non-standard consideration or payments involved in the transaction
- 308 Incentives for assignment
- 309 Unusual, unexplainable and/or unrelated premium payors
- 310 Weak financial documentation
- 311 Unusual or non-standard ownership or beneficial interests in a trust owning the policy that favor a third-party lender or investor
- 312 Recent, excessive insurance activity or a request for multiple contracts
- 313 Insured over the age of 65 with some medical impairment
- 314 No insurance in force
- 315 Newly formed trust and or new producer
- 316 Assignment of a contract
- 317 Solicitation materials containing STOLI red flags

### **400 CLAIMS**

- 401 Anonymous and/or frequent telephone inquiries regarding the status of a pending claim
- 402 Beneficiary has no insurable interest (life insurance only)
- 403 Change in beneficiary shortly before insured's death
- 404 Circumstances of death are vague or incomplete
- 405 Death certificate from foreign country
- 406 The decedent is a child living in a foreign country
- 407 Death occurred outside the U.S.
- 408 Delay in submitting death claim notice
- 409 Increase in coverage about just before insured's death
- 410 Medical records from foreign countries
- 411 No evidence of death, no death certificate
- 412 Policy lapses and a claim is submitted
- 413 Company check cashed after date of death of the owner

### **500 INTERNAL (EMPLOYEE)**

- 501 Erratic behavior, mood swings
- 502 Frequently submits expense reports with lost receipts and/or charges that appear to be inflated
- 503 Living beyond their means (extravagant spending, living, etc.)
- 504 Multiple complaints by customers or employees
- 505 Reluctant to share information or access to

- 506 Reluctant to take vacations
- 507 Seeking a job transfer at lesser pay and/or job grade without valid reasons
- 508 Working long hours or requesting to work hours when no one is around
- 509 Creditors or collectors appearing at the workplace

**600 VENDOR (SUPPLIER)**

- 601 Bribe or use of internal relationship to obtain relationship with Athene
- 602 Inaccurate invoices (services not performed, over inflated invoices, etc.)
- 603 Publicly known to be involved in illegal activity
- 604 Submission of duplicate invoices
- 605 Submission of invoices for services not performed
- 606 Employee whistleblowing
- 607 Unwillingness to replace a vendor despite quality control failures
- 608 Uncontested price increases
- 609 Little to no concern with quality of services being procured
- 610 Altered Payee

**REFERENCE DOCUMENTS**

- Athene USA Financial Crime Anti-Fraud Policy
- Anti-Fraud Plan
- Fraud Red Flag Definitions