



# Globe Life – Liberty National

While Globe Life claims its processes are working, Liberty National agents impersonate government employees

## PLEASE READ IMPORTANT DISCLAIMER – PAGE 6

**July 31, 2024** – Globe Life’s Liberty National agents regularly misrepresent themselves as government employees to generate leads. This practice is instructed and mandated from the corporate level, and we believe is illegal.

This, together with abundant evidence Viceroy have produced across 12 reports, directly contradicts Globe Life’s earnings call on July 25, 2024, where they implied that their extremely limited independent investigation had detected no issues with their processes.

Management claims that the gross misconduct reported by Viceroy and multiple other parties is isolated to individual American Income Life agencies and agents. As we have shown, and will continue to show, this is absolutely false.

## 1. The “independent investigation”

Globe Life announced the results of their investigation on July 22, 2022, in an 8-K filing that is notably light on detail. After valid questions by analysts on their earnings call, Globe Life management revealed the true (lack of) extent of the investigation:

- The scope only included the company’s SEC filings and its processes for preventing, identifying and responding to misconduct,
- Globe Life Co-CEO Matt Darden repeatedly dodged the question of whether agent misconduct was investigated.
- When asked whether the review resulted in any terminations, Darden again dodged the question saying it would not be “a fair statement” to state there were no terminations due to the investigation.

This is to be expected – Wilmer Hale was engaged to find nothing, and they did a stellar job.

Globe Life continues to rely on the independent contractor status of its agents, even when responding to complaints that agents are forced to work with the now infamous terminated sex pest Mike Russin. Globe Life shirks responsibility as ‘independent contractors ‘control the manner and means of work’ and are ‘free to choose the manner in which work is performed’

- Ms. Reay claims that she “was forced to work with Mike Russin after Russin was allegedly [REDACTED] sexual harassment”. Ms. Reay’s allegation makes clear nobody at the Company “forced” her to do anything, n [REDACTED] as Ms. Reay’s contract makes clear that she “alone [] control[s] the manner and means of [he [REDACTED] and [is] free to choose the manner in which [her] work is performed.” Ex. B, pg. 7.

*Figure 1 – Excerpt of letter sent from AIL Corporate to the OPEIU Local 277 President*

The earnings call also touched on the astoundingly weak security of Globe Life’s web systems, which Viceroy brought to the attention of regulators.

Contrary to Globe Life’s statements, the problems are not confined to individual AIL agencies. Viceroy has found significant issues at Liberty National which stem from the same top-down culture of sales-at-any-cost.

## 2. Liberty National

Liberty National is Globe Life’s 2<sup>nd</sup> largest subsidiary and predominantly sells low face value life policies through an employer payroll deduction program. It effectively functions the same way as American Income Life:

- Agents are required to recruit other agents to advance in the organization.



- Leads are obtained from an organization, in Liberty National’s case employers.
- Customers are bait-and-switched into the sales pitch through the offering of no-cost policies or benefits.
- Liberty National agents are classified as independent contractors despite the company controlling their hours and manner of work.

The key difference between Liberty National and American Income Life is their primary source of leads: while American Income Life targets union members through deals with unions, Liberty National focuses on targeting prospects through their employers. In both cases, Globe Life is borrowing credibility from a trusted party, whether the union or the employer, of potential policyholders to facilitate sales.

Liberty National agents are expected to do double duty as both sales agents and what AIL refers to as PR reps. They contact the businesses under their ‘Worksite Advantage’ program to obtain employee lists, offer the no-cost AD&D benefit to employees, and pitch to the employees directly. Employees can then purchase additional policies from Liberty National, the premium of which is deducted from their payroll.

Unsurprisingly, Liberty National’s success rate with this method appears to be extremely low. An example of what is considered a ‘good’ success rate for business leads (getting the employee list) appears to be 2.5%, a number we found by multiplying the target rates for Decision Makers Met, Decision Markers Converted and Cases Closed:

%	Coaching Using Activity Percentages		
	Green	Yellow	Red
Walk-ins: Decision Makers Met	Above 30%	20% – 30%	Below 20%
Decision Maker Conversion	Above 33%	20% – 33%	Below 20%
Presentations: Cases Closed	Above 25%	15% – 25%	Below 15%

Figure 2 – Liberty National Agent Performance Rubric

## Training Materials

Viceroy have obtained Liberty National Training materials including handbooks and scripts which are hosted at [www.globelivenow.com](http://www.globelivenow.com). While the website is password protected, it is indexed and a Google search for “site:globelivenow.com” will return pages for each Liberty National agency that uses the site.

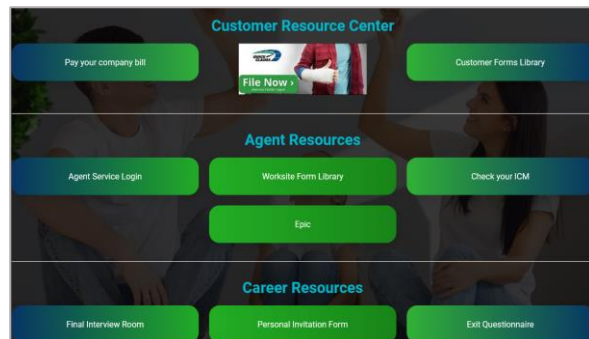
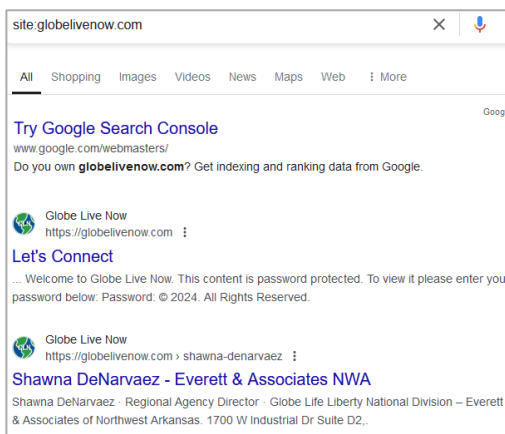


Figure 3 – Google results for “site:globelivenow.com” & Shawna DeNarvaez Globe Live Now page



Liberty National’s training materials and scripts appear to be directly issued by corporate. A copy of Liberty National’s Worksite Training Guide<sup>1</sup> obtained by Viceroy is presented in Globe Life corporate colors and styling with a corporate document number on the front page. The guide also includes an introduction page with a photo and signature of Liberty National’s president (then EVP), Mike Sheets.

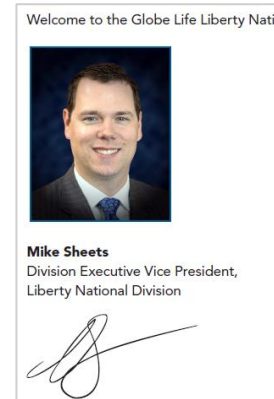


Figure 4 & 5 – Corporate Document ID & Welcome Page Signed by Mike Sheets

### Impersonation of government employees

Liberty National trains its agents to represent themselves as government employees to generate leads. The practice is known as a Pre-Approach Call (PAC) and involves the agent cold-calling businesses using details obtained from sites such as Sales Genie claiming to be local government employees updating county records<sup>2</sup>.

**This appears to be the main lead generation method Liberty National uses and we believe it is illegal.**

The script below is from Liberty National’s Worksite Training Guide created in June 2022<sup>3</sup>. The guide is provided to all agents as part of their classroom training at Liberty National.

## PAC Script

“Hello, my name is \_\_\_\_\_. We are calling the businesses here in \_\_\_\_\_ County today to update our records.”

1. “Is your office still located at \_\_\_\_\_?”  
*I. If blue collar industry, ask: “Is that a home address?”*  
*II. If it sounds large/not local, ask: “Is this the headquarters?”*
2. “Is \_\_\_\_\_ still the Decision Maker for the company?”
3. “Do you still have \_\_\_\_\_ employees that work at least 28 hours per week?”
4. \* “Who did I have the pleasure of speaking with today \_\_\_\_\_?”  
*\*Say this only if you have not received their name at the beginning of the call.*
5. “Great. Thank you.”

### Possible Questions and Responses

**Q: “What is this regarding?”**  
**A: “We are updating public records in \_\_\_\_\_ county...(lead into question you asked previously)”**

**Q: “What records?”**  
**A: “The public information records of your (Business Name).”**

Figure 6 – PAC Script

<sup>1</sup> [https://globelivenow.com/wp-content/uploads/2023/03/385000\\_New\\_Agent\\_Training\\_Guide-7.pdf](https://globelivenow.com/wp-content/uploads/2023/03/385000_New_Agent_Training_Guide-7.pdf)

<sup>2</sup> <https://www.dataaxlegenie.com/>

<sup>3</sup> Internal Document Number 385000 LND4059 0322





This practice continues in 2024, according to a quizlet.com presentation dated May 2024 and a LinkedIn post by Liberty National’s Nuckolls agency showing almost 3,000 PAC calls a week.

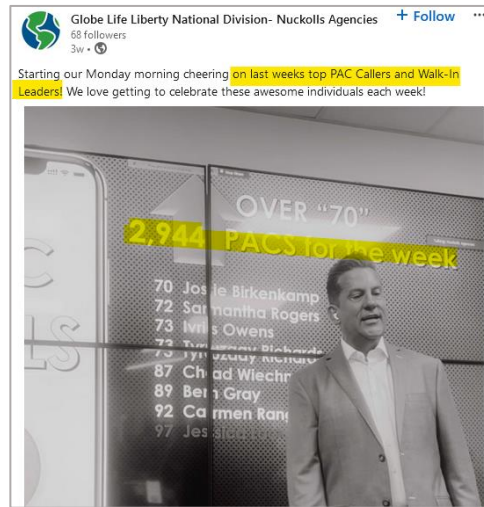
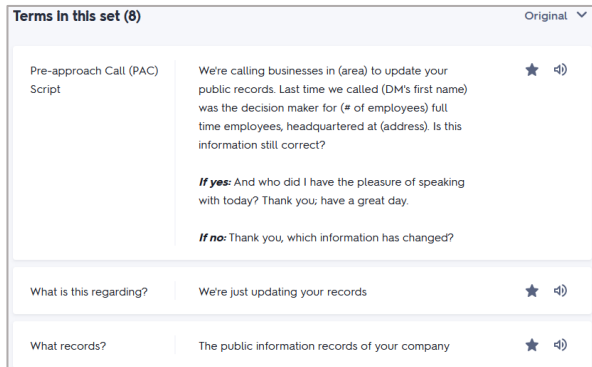


Figure 7 – PAC Script notes

The purpose of the pre-approach calls is to verify key information like number of employees and the name of the decision maker to remove friction and provide credibility when the agents attend the business to solicit in person.

At no point in the PAC script do the agents introduce themselves as Globe Life or Liberty National agents, or speak about benefits.

A former Liberty National executive stated that this practice is endorsed by Liberty National’s executive team and frequently goes “off-the-rails” with agents claiming they are updating tax records.

The Liberty National executive also said the process was taught by trainers and the CEO:

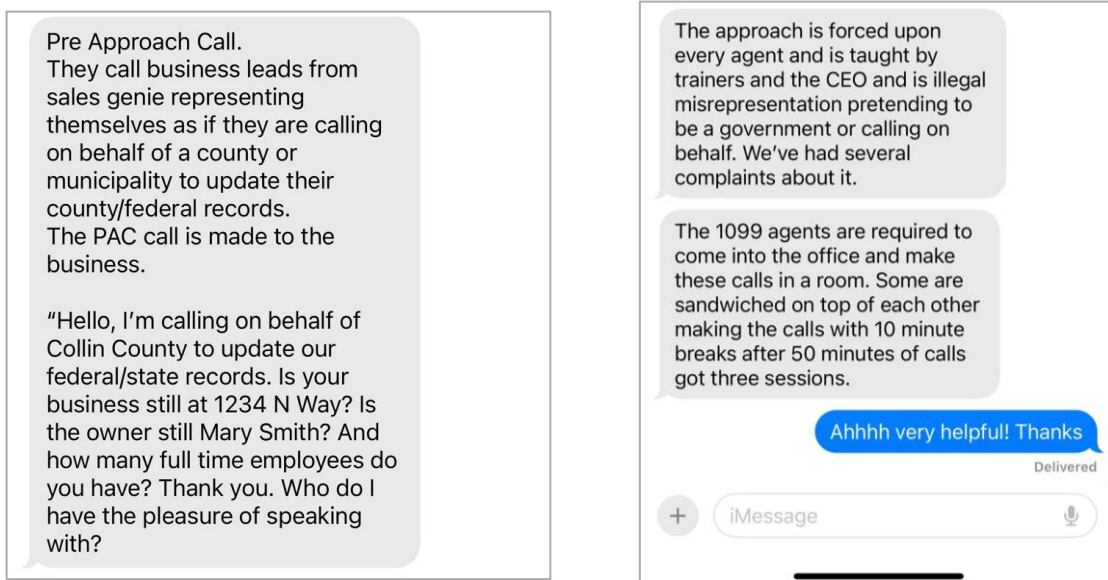


Figure 8 – Excerpt of text messages with a former Liberty National executive

A Reddit post, which is supported by conversations with the former Liberty National executive, depicts that trainees are instructed to not use their real name or mention Liberty National or Globe Life



Monday office days were never fun. I hated the stupid zoom meetings and especially hated those sleazy fucking PAC calls. I started to really get alarmed when I was instructed to never use my real name and never mention Globe Life Liberty National Division when making those calls to confirm information. It was just very annoying and repetitive, and I felt sympathy for the people on the other line who were skeptical/pissed off about the random calls asking for info about their business. A whole day at the office, from 8-5, with absolutely no pay. Working for free.

*Figure 9 – Excerpt of Reddit post<sup>4</sup>*

Impersonating a federal employee is a federal and state crime and Liberty National’s requirement that agents use this PAC script may be viewed as an inducement to commit said crimes<sup>5</sup>. We have reported it to the relevant authorities and encourage current Liberty National agents to seek representation.

## Conclusion

The company stated in its April 11, 2024, press release<sup>6</sup> that it intended to “more fully rebut these allegations in the near future”. Three and a half months have passed in which Globe Life has failed to rebut any issues raised by Viceroy or other parties, instead seeking to dismiss concerns through a catch all “independent investigation”.

This is the 13<sup>th</sup> note Viceroy has published on Globe Life, and the first addressing Liberty National specifically. It will not be the last.

Viceroy looks forward to Globe Life’s detailed rebuttal of issues raised in this note and the 12 notes preceding it.

More to come.

<sup>4</sup> [https://www.reddit.com/r/antiMLM/comments/w85vif/have\\_i\\_been\\_hired\\_into\\_a\\_pyramid\\_scheme\\_globe/](https://www.reddit.com/r/antiMLM/comments/w85vif/have_i_been_hired_into_a_pyramid_scheme_globe/)

<sup>5</sup> 18 U.S. Code § 912

<sup>6</sup> <https://investors.globelifeinsurance.com/news-releases/2024/april/globe-life-inc-issues-statement-refuting-short-seller-allegations>



### **Attention: Whistleblowers**

Viceroy encourage any parties with information pertaining to misconduct within Globe Life, its affiliates, or any other entity to file a report with the appropriate regulatory body.

We also understand first-hand the retaliation whistleblowers sometimes face for championing these issues. Where possible, Viceroy is happy act as intermediaries in providing information to regulators and reporting information in the public interest in order to protect the identities of whistleblowers.

You can contact the Viceroy team via email on [viceroy@viceroyresearch.com](mailto:viceroy@viceroyresearch.com).

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