

BEFORE THE DIVISION OF INSURANCE
DEPARTMENT OF LABOR AND REGULATION
STATE OF SOUTH DAKOTA

IN THE MATTER OF AMERICAN PUBLIC LIFE INSURANCE COMPANY	INS 25-1020916 CONSENT ORDER
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In resolution of the above matter and in lieu of issuance of a Notice of Hearing and a formal hearing, the undersigned parties do hereby agree to the following:

AMERICAN PUBLIC LIFE INSURANCE COMPANY, 169530202, with an address of record is P.O. Box 269105, Oklahoma City, OK, 73126, holds a Certificate of Authority in the State of South Dakota;

AMERICAN PUBLIC LIFE INSURANCE COMPANY is aware that the South Dakota Division of Insurance (Division) has conducted an investigation into their insurance related business;

The Division alleges the following with regard to AMERICAN PUBLIC LIFE INSURANCE COMPANY:

1. AMERICAN PUBLIC LIFE INSURANCE COMPANY sold coverage to South Dakota consumers under out of state group policies with unfiled certificates and/or association plans under unapproved associations, through unappointed producers, in violation of SDCL 58-11-12; 58-18-3; 58-30-176; ARSD 20:06:42:01;
2. The Director of the Division may revoke AMERICAN PUBLIC LIFE INSURANCE COMPANY's Certificate of Authority for any one of the above-cited violations;

AMERICAN PUBLIC LIFE INSURANCE COMPANY is aware of and understands the nature of the allegations and has been informed that they have the right to a Notice of Hearing, counsel, and appeal, and that by signing this Consent Order, waives these rights;

In return for AMERICAN PUBLIC LIFE INSURANCE COMPANY agreeing to, signing, and complying with the provisions of this Consent Order, the Division agrees not to proceed to administrative hearing and agrees that this Consent Order will constitute an informal disposition of this licensing matter pursuant to SDCL 1-26-20;

By the execution of the Consent Order and payment of a penalty, AMERICAN PUBLIC LIFE INSURANCE COMPANY neither admits to nor denies any violation of the laws of the State of South Dakota but waives its right to contest the existence of this Consent Order in any future actions or licensing procedures with the Division;

AMERICAN PUBLIC LIFE INSURANCE COMPANY agrees to a monetary penalty in the amount of \$75,000 pursuant to SDCL 58-4-28.1, in lieu of an administrative hearing and Final Decision;

AMERICAN PUBLIC LIFE INSURANCE COMPANY further agrees to conduct business in accordance with the insurance laws and regulations of the State of South Dakota; and

AMERICAN PUBLIC LIFE INSURANCE COMPANY further agrees that this Consent Order may be considered for the purpose of determining the appropriate sanction in any future actions with the Division for any violations of the laws or regulations of the State of South Dakota or for failing to abide by any order of the Director;

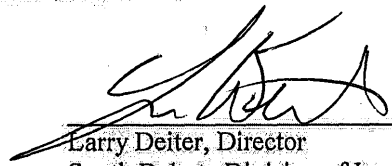
Wherefore, good cause appearing from the foregoing, it is hereby ORDERED that AMERICAN PUBLIC LIFE INSURANCE COMPANY pay a monetary penalty in the amount of \$75,000 payable to "South Dakota Division of Insurance" for deposit in the General Fund of the State of South Dakota; and it is further

ORDERED that AMERICAN PUBLIC LIFE INSURANCE COMPANY abide by the agreements made by them in this Consent Order; and it is further

ORDERED that the use of this Consent Order for competitive purposes by an insurance agent or third-party administrator holding a license in the State of South Dakota, or by any company holding a Certificate of Authority, or by anyone on their behalf, may be deemed unfair competition and be grounds for suspension or revocation of said license or authority; and it is further

ORDERED that the provisions of this Consent Order shall be effective from the date the Director signs this Order.

Dated at Pierre, South Dakota this 1st day of December, 2025.


Larry Deiter, Director
South Dakota Division of Insurance

The undersigned, on behalf of AMERICAN PUBLIC LIFE INSURANCE COMPANY, represents it understands the terms of this Consent Order and the waiver of its due process rights and voluntarily enters into this Consent Order.

Dated this 18th day of November, 2025.


Signature of Authorized Representative

Christopher T. Kenney
Printed Name

SVP, General Counsel
Title