

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

IN THE MATTER OF)	
PATRIOT GROWTH)	CONSENT ORDER
INSURANCE SERVICES, LLC)	

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:

PATRIOT GROWTH INSURANCE SERVICES, LLC (hereafter "PATRIOT GROWTH") whose address of record is 501 Office Center Dr., Suite 215, FT. Washington, PA 19034 has filed an application to renew its business entity license in the State of South Dakota;

PATRIOT GROWTH is aware that the South Dakota Division of Insurance ("Division") has conducted an investigation;

The South Dakota Division of Insurance alleges the following:

- 1) PATRIOT GROWTH failed to perform due diligence regarding a Multiple Employer Welfare Arrangement ("MEWA") that it sold to South Dakota consumers, as administered by an unlicensed third-party administrator, in violation of SDCL 58-8-1, 58-8-3, 58-29D-27, 58-33-94, 58-33-96, 58-33-98, 58-33-99, 58-33-102 and 58-33-103;
- 2) PATRIOT GROWTH also accepted insurance business from an unlicensed individual who sells, solicits, or negotiates insurance, in violation SDCL 58-30-167(12);
- 3) PATRIOT GROWTH filed a business entity renewal application on April 30, 2024;
- 4) PATRIOT GROWTH provided incomplete information to the Division's inquiries, in violation of SDCL 58-33-66(2) and 58-30-167(8), but did ultimately cooperate and provide all requested information;
- 5) PATRIOT GROWTH ceased marketing the MEWA after communications with the Division;
- 6) The above-cited conduct may be grounds for the denial of PATRIOT GROWTH's business entity renewal application pursuant to SDCL 58-30-167,(2),(8),&(12), 58-33-66, 58-33-68, 58-29D-27, 58-33-102 and 58-33-103;

PATRIOT GROWTH is aware of and understands the nature of the charges and has been informed that it has the right to notice, hearing, and appeal, and that by agreeing to and signing this Consent Order waives these rights;

In return for PATRIOT GROWTH agreeing to 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 this Consent Order and the payment of a penalty pursuant to this Consent Order, PATRIOT GROWTH neither admits to nor denies any violation of the laws of the State of South Dakota, but waives its right to contest this Consent Order in any future actions or licensing proceedings with the Division;

PATRIOT GROWTH further agrees to pay \$10,000 pursuant to SDCL 58-30-167 and 58-4-28.1, in lieu of an administrative hearing and Final Decision;

PATRIOT GROWTH further agrees to conduct itself in accordance with the insurance laws and regulations of the State of South Dakota;

PATRIOT GROWTH 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;

PATRIOT GROWTH waives its right to contest the allegations contained in this Consent Order in any future actions or licensing procedures;

Wherefore, good cause appearing from the foregoing, it is hereby ORDERED that PATRIOT GROWTH pay a monetary penalty in the amount of \$10,000 payable to "South Dakota Division of Insurance" for deposit in the general fund of the State of South Dakota; and it is further

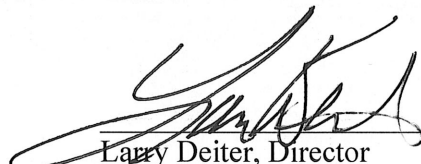
ORDERED that PATRIOT GROWTH's pending business entity renewal application is approved as of the effective date of this order; and it is further

ORDERED that PATRIOT GROWTH abide by the agreements made 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 31st day of January, 2025.



Larry Deiter, Director
South Dakota Division of Insurance

[Signature page of PATRIOT GROWTH follows]

The undersigned, on behalf of PATRIOT GROWTH, represents it understands the terms of this Consent Order and the waiver of its due process rights and voluntarily enter into this Consent Order.

Dated this 18th day of January, 2025.

Caroline E. Smith
Signature of Authorized Representative

Caroline E. Smith
Printed Name

SVP - Deputy General Counsel
Title
Compliance Officer