

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

IN THE MATTER OF FIRSTENROLL, LLC	INS 26-31087 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:

FIRSTENROLL, LLC, (FIRSTENROLL) with an address of record of 101 Crawfords Corner Road, Ste 4233, Holmdel, NJ 07733, is a licensed third-party administrator (TPA) in the State of South Dakota;

FIRSTENROLL is aware that the South Dakota Division of Insurance (Division) has conducted an investigation into its insurance related business;

The Division alleges the following with regard to FIRSTENROLL:

1. FIRSTENROLL, acted as an intermediary, connecting insurance businesses offering products with independent agencies, submitting producer paperwork to carriers for producer processing, facilitating premium billing collection, and providing producer access to licensed and unlicensed products without sufficient administrative controls;
2. FIRSTENROLL contracted with unlicensed insurers and disapproved associations to make those products available through its platform;
3. The Division's investigation found that FIRSTENROLL had insufficient safeguards and administrative control deficiencies, which enabled consumers to be sold unfiled products, provided by unlicensed insurance companies and/or unregistered DMPOs, through unapproved associations, by unlicensed and/or unappointed producers, in violation of SDCL 58-8-1, 58-17E-7, 58-29D-31(2), (4), (7) & (8), 58-29D-32(3), 58-30-167(2), (8) & (12), 58-30-171, 58-30-176, and ARSD 20:06:42:01;
4. The Director of the Division may revoke FIRSTENROLL's TPA license for any one of the above-cited violations;

FIRSTENROLL represents it has significantly revised its operations, including increases in staffing, new internal control policies, and programmatic platform safeguards to identify and prevent the compliance concerns addressed in the above allegations;

FIRSTENROLL is aware of and understands the nature of the allegations and has been informed that it has the right to a Notice of Hearing, counsel, and appeal, and that by signing this Consent Order, waives these rights;

In return for FIRSTENROLL 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;

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

FIRSTENROLL agrees to a monetary penalty in the amount of \$100,000 pursuant to SDCL 58-4-28.1, in lieu of an administrative hearing and Final Decision;

FIRSTENROLL further agrees to conduct its business in accordance with the insurance laws and regulations of the State of South Dakota; and

FIRSTENROLL 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;

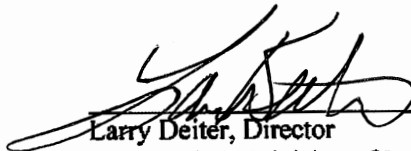
Wherefore, good cause appearing from the foregoing, it is hereby ORDERED that FIRSTENROLL pay a monetary penalty in the amount of \$100,000 payable to "South Dakota Division of Insurance" for deposit in the General Fund of the State of South Dakota; and it is further

ORDERED that FIRSTENROLL abide by the agreements made by it 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 21st day of May, 2026.



Larry Deiter, Director
South Dakota Division of Insurance

[Signature page for FIRSTENROLL follows.]

The undersigned, on behalf of FIRSTENROLL, 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 15th day of May, 2026.

Kathryn Dawson
Signature of Authorized Representative

Kathryn Dawson
Printed Name

Chief Administrative Officer
Title