BEFORE THE DEPARTMENT OF INSURANCE
STATE OF NEBRASKA

STATE OF NEBRASKA
DEPARTMENT OF INSURANCE,

PETITIONER,

VS.

TWYLI KEILSTRUP
(NAIC Producer #18974094),

RESPONDENT.

CONSENT ORDER

CAUSE NO. A-2211

In order to resolve this matter, the Nebraska Department of Insurance ("Petitioner"), by and through its attorney, Michael W. Anderson, and Twyli Keilstrup ("Respondent"), mutually stipulate and agree as follows:

JURISDICTION

1. Petitioner has jurisdiction over the subject matter and Respondent pursuant to Neb. Rev. Stat. §§ 44.101.01, and 44-4047 to 44-4067.

2. Respondent has been licensed as a non-resident insurance producer under the laws of Nebraska at all times material hereto.

STIPULATIONS OF FACT

1. Petitioner initiated this administrative proceeding by filing a Petition captioned State of Nebraska Department of Insurance vs. Twyli Keilstrup (NAIC National Producer # 18974094), Cause Number A-2211 on May 15, 2020. A copy of the Petition was sent to the Respondent at her registered address by certified mail, return receipt requested, and by regular U.S. mail. A copy of the petition was emailed to the Respondent at mkeilstrup@outlook.com on June 17, 2020, per her request. Respondent acknowledges receiving proper Notice of these proceedings.

2. Respondent is alleged to have violated Neb. Rev. Stat. §§ 44-4059(1) (b), 44-4059 (1) (g), 44-4059(1) (h), and 44-1524 (1) as follows:
a. In September 2019, Respondent was terminated by Freedom Life Insurance Company of America (Freedom Life). Respondent was appointed to sell life and health insurance policies to consumers. After conducting an internal audit covering a five (5) month period, Freedom Life determined Respondent had sold numerous high-premium policies of which the consumers could not be contacted for verification. Of the applications for these policies, several were submitted with Respondent's bank routing number, and several shared the same phone number as Respondent.

b. Respondent was interviewed by Freedom Life. Respondent admitted that she had been submitting fraudulent applications for insurance to Freedom Life.

c. On or about October 17, 2019, an Investigator with Petitioner's Consumer Affairs Division sent a certified letter to Respondent's address, requesting a response to the investigation conducted by Freedom Life. The letter sent on or about October 17, 2019 was delivered to Respondent's address and signed for. Follow-up correspondence was sent on or about November 7, 2019. A response was never received from Respondent.

3. Respondent admits the allegations in Paragraph 2

4. Respondent was informed of her right to a public hearing. Respondent waives that right and enters into this Consent Order freely and voluntarily. Respondent understands and acknowledges that by waiving her right to a public hearing, Respondent also waives her right to confrontation of witnesses, production of evidence, and judicial review.

CONCLUSIONS OF LAW

Respondent's conduct as alleged above constitutes violations of Neb. Rev. Stat. §§ 44-4059(1) (b), 44-4059 (1) (g), 44-4059(1) (h), and 44-1524 (1), and Respondent is subject to disciplinary action pursuant to Neb. Rev. Stat. §44-4059.
In September 2018, Respondent was terminated by Freedom Life Insurance Company of America ("Freedom Life"). Respondent was subsequently hired by and assigned to sell life and health insurance policies to consumers. After continuing to review and analyze the Freedom Life sales program, Respondent found the policies offered were not competitive within the insurance market. By the fall of 2018, Respondent submitted an application for insurance to Freedom Life. Freedom Life had been reviewing Respondent’s submission for insurance to Freedom Life.

On October 17, 2018, an investigation was conducted by the Division of Insurance as a result of a complaint received from a consumer alleging that Respondent solicited an order for a Freedom Life policy without the proper knowledge of and consent of the consumer.

On February 7, 2019, the investigation was concluded as there was insufficient evidence of a violation of the laws enforced by the Division of Insurance. The file was closed on February 7, 2019.

Decisions made in this investigation are final and not subject to appeal. Freedom Life waive any and all claims or defenses that Respondent may have based on the hearings, or any appeal of the findings or conclusions of the Division of Insurance, or any right to administrative review.

CONCLUSIONS OF LAW

Respondent is not considered an insurance producer, as defined in Section 46-703 of the Revised Statutes of Nebraska. Respondent's actions fell under the authority of Section 46-703(2)(a) and (b) of the Revised Statutes of Nebraska.

RECEIVED

JUN 29 2019

NEBRASKA DEPARTMENT OF INSURANCE
CONSENT ORDER

It is therefore Ordered by the Director of Insurance and agreed by Respondent that:

1. Respondent agrees to the revocation of her Nebraska non-resident insurance producer’s license, with said revocation to be effective on the date this Consent Order is adopted and approved by the Director of Insurance.

In witness of their intention to be bound by this Consent Order, each party has executed this document by subscribing their signatures below.

Michael W. Anderson, #25671
Attorney for Petitioner
1135 M Street, Suite 300
Lincoln NE 68501
(402) 471-2201

6/29/2020
Date

Twyl Keilstrup
Respondent

6/27/2020
Date

State of Texas

County of Knox

On this 27th day of July, 2020, Twyl Keilstrup, personally appeared before me and read this Consent Order, executed the same, and acknowledged the same to be her voluntary act and deed.
CONSSENT ORDER

It is therefore ORDERED by the Director of Insurance and signed by the Respondent that
Reponendant agrees to the resolution of all Nebraska non-resident insurance proceedings
below with said resolution to be effective on the date this Consent Order is signed
and approved by the Director of Insurance.

In witness of their intention to be bound by this Consent Order, each party hereto executes the
agreement by signing their signatures below.

Twyll Keleher
Respondent

Michael W. Anderson, ASCRT
Attorney for Petitioner
1125 M Street, Suite 330
Lincoln, NE 68501
(402) 477-5233

Date

STATE of
COUNTY of

ON the __ day of __, 2020, Twyll Keleher, personally appearing before
us and being the Consent Order executed to same, and acknowledging the same to be her
voluntary act and deed.

RECEIVED

NEBRASKA DEPARTMENT OF INSURANCE

JUN 29 2020
CERTIFICATE OF ADOPTION

I hereby certify that the foregoing Consent Order is adopted as the Final Order of the Nebraska Department of Insurance in the matter of State of Nebraska Department of Insurance vs. Twyl Keilstrup (NAIC National Producer #18974094), Cause No. A-2211.

STATE OF NEBRASKA
DEPARTMENT OF INSURANCE

Bruce R. Ramge
Director of Insurance

Date

6-29-2020

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Consent Order was served upon Respondent by mailing a copy to her registered home address at 3411 Hastings Drive, Arlington, Texas, 76013, by certified mail, return receipt requested, by regular U.S. mail, and via email to mkeilstrup@outlook.com, on this 20th day of June, 2020.

Sherry Storie
CERTIFICATE OF APPOINTMENT

I hereby certify that the foregoing Consent Order is adopted as the Final Order of the Nebraska Department of Insurance in the matter of State of Nebraska Department of Insurance v. Terry Keeling (NAIC National Producer #19844000) Case No. A-2547.

STATE OF NEBRASKA
DEPARTMENT OF INSURANCE

[Signature]
Director of Insurance

[Signature]
Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Consent Order was served upon Respondent by mailing a copy to the registered home office of the HealthCare Choice Advantage, 100 13th St., North, Trenton, N.J. 08618, by certified mail, return receipt requested, pursuant to Nebraska's mail and/or email law.

[Signature]
Date