



Globe Life – Keefer Success Training Videos

Globe Life’s training materials are a mess of dishonest and manipulative sales practices

PLEASE READ IMPORTANT DISCLAIMER – PAGE 14

July 11, 2024 – Former Globe Life agents have sent Viceroy a trove of revealing Globe Life agent training materials hosted on www.thekeefersuccess.com. These materials include scripts, manuals, recruiting materials created by AIL Managing Director James Keefer, and videos from American Income Life’s star agents, including:

- Brian Gilmore, Director of Field Operations at **AIL**
- Patrick “Bulldog” Bendure, Director of Operations at **AIL**
- James Keefer, Managing Director at **AIL**
- Rick Altig, SGA of **AO National**, AIL’s largest agency
- Marcus Smith, SGA of **Surace Smith Bendure Hartwig**
- Simon Arias, SGA of **Arias Organization**
- Zach Hart, former SGA of **Zach Hart Agency**
- Tommy Vena, SGA of **Vena Agency**
- Justin Adams, MGA at **Arias Organization**
- Tim Clark, “Million dollar man” at **Surace Smith Bendure Hartwig**
- Jesse Rennich, RGA at **Arias Organization**

These training materials include multiple false claims and misrepresentations that agents are expected and encouraged to repeat to customers to close a sale. Viceroy has AI-transcribed these videos for the purposes of this report.

An archived version of the site from July 2020 can be found at the link below. We encourage all shareholders and regulators to closely examine the resources for an on-the-ground view of what is happening at Globe Life instead of the rosy picture painted by management.

<https://web.archive.org/web/20200720190057/https://thekeefersuccess.com/>

The bulk of the content on the website is in the form of videos of training sessions for agents already out in the field and include false claims, misleading sales tactics and outright fabrications, including:

- False claims of program exclusivity
- False claims of limited enrollment periods
- False claims that decisions must be made on the day of the presentation
- Misrepresenting when rate increases on other policies occur
- Fabricating sob stories including the deaths of family members
- Using beneficiaries as leads without the policyholder’s consent, which has resulted in formal complaints

The videos also acknowledge that virtually every agent has misrepresented themselves as union representatives and alcohol use in the office.

The significance of these videos cannot be understated, featuring top-producing SGAs and senior management promoting misleading – and in some cases illegal – conduct as the pathway to success at AIL.



Responsibility for training materials

Under the NAIC's Advertisements of Life Insurance and Annuities Model Regulation 570¹, AIL itself bears responsibility for advertisements for its products, regardless of whether AIL or one of its agencies or agents created the material.

- B. All advertisements, regardless of by whom written, created, designed or presented, shall be the responsibility of the insurer, as well as the producer who created or presented the advertisement. Insurers shall establish and at all times maintain a system of control over the content, form and method of dissemination of all advertisements of its policies. A system of control shall include regular and routine notification, at least once a year, to agents, brokers and others authorized by the insurer to disseminate advertisements of the requirement and procedures for company approval prior to the use of any advertisements that is not furnished by the insurer and that clearly sets forth within the notice the most serious consequence of not obtaining the required prior approval.

Figure 1 – NAIC Model Regulation 570

21 states have adopted this model regulation, which clearly defines “advertisement” as including “material used for the recruitment, training and education of an insurer’s insurance producers.”

Section 2. Definitions

For the purpose of this regulation:

- A. (1) “Advertisement” means material designed to create public interest in life insurance or annuities or in an insurer, or in an insurance producer; or to induce the public to purchase, increase, modify, reinstate, borrow on, surrender, replace or retain a policy including:

Comment: See drafting note caveat immediately following the definition of “insurance producer” in this section.


- (a) Printed and published material, audiovisual material and descriptive literature of an insurer or insurance producer used in direct mail, newspapers, magazines, radio and television scripts, telemarketing scripts, billboards and similar displays, and the Internet or any other mass communication media.
- (b) Descriptive literature and sales aids of all kinds, authored by the insurer, its insurance producers, or third parties, issued, distributed or used by the insurer or insurance producer; including but not limited to circulars, leaflets, booklets, web pages, depictions, illustrations and form letters;
- (c) Material used for the recruitment, training and education of an insurer’s insurance producers which is designed to be used or is used to induce the public to purchase, increase, modify, reinstate, borrow on, surrender, replace or retain a policy;
- (d) Prepared sales talks, presentations and materials for use by insurance producers.

Figure 2 – NAIC Model Regulation 570

¹ <https://content.naic.org/sites/default/files/inline-files/MDL-570.pdf>



Globe Life’s own advertising submission form GLB1587A includes a checkbox for training material meaning that everything on the Keefer Success website must have been approved by Globe Life for the purposes of agent training.



Advertising Submission Form

To submit your completed request form and the material to be reviewed, please email them to AdApproval@Globe.Life in either Microsoft Word or PDF format.

Please note that no material can be used until the Home Office has issued a form number and provided formal approval.

The Advertising Committee meetings take place every Tuesday at 2:30pm Central Time. Kindly allow for a three-week approval process. It is important to note that submissions received after noon (Central Time) on Friday will not be reviewed until the following week.

Date

Company

<input type="radio"/> American Income Life Insurance Company	<input type="radio"/> Globe Life	<input type="radio"/> Liberty National Division
<input type="radio"/> Employee Services Division	<input type="radio"/> Globe Life Group Benefits	<input type="radio"/> National Income Life Insurance Company
<input type="radio"/> Family Heritage Division	<input type="radio"/> Globe Life Insurance Company of New York	<input type="radio"/> United American

Request Type Please select one. Provide form number of existing piece if revising or renewing approval.

<input type="radio"/> Initial Approval — New advertising, sales, training , or recruiting material not reviewed before
<input type="radio"/> Renew Approval — Previously approved material (no changes made)
<input type="radio"/> Recruiting
<input type="radio"/> Logo — Select file type <input type="checkbox"/> PDF <input type="checkbox"/> PNG

Your Personal Information (Please Print)

Name <input style="width: 95%;" type="text"/>	Agent Number/Agency Number <input style="width: 95%;" type="text"/>
Phone Number <input style="width: 45%;" type="text"/>	Email Address <input style="width: 55%;" type="text"/>

Agency Address (Please Print)

Agency Street Address <input style="width: 95%;" type="text"/>	City <input style="width: 95%;" type="text"/>	State <input style="width: 95%;" type="text"/>	ZIP <input style="width: 95%;" type="text"/>
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Distribution How and where will this piece be used? Request will not be processed without this information.

State(s) <input style="width: 95%;" type="text"/>	Quantity (if printing) <input style="width: 95%;" type="text"/>			
<input type="checkbox"/> Newspaper Ad	<input type="checkbox"/> 'Take One'	<input type="checkbox"/> Direct Mail	<input type="checkbox"/> Trade Show	<input type="checkbox"/> Billboard
<input type="checkbox"/> Radio Ad	<input type="checkbox"/> Flyer	<input type="checkbox"/> Yellow Pages	<input type="checkbox"/> Sales Presentation	<input type="checkbox"/> Pole Sign
<input type="checkbox"/> Magazine Ad	<input type="checkbox"/> Phone Script	<input type="checkbox"/> Lead Card	<input type="checkbox"/> Publication Article	<input type="checkbox"/> Car Signage
<input type="checkbox"/> Television Ad				
<input type="checkbox"/> Website (Please provide URL)	<input style="width: 95%;" type="text"/>			
<input type="checkbox"/> Other (Specify)	<input style="width: 95%;" type="text"/>			

Figure 3 – Globe Life Advertising Submission form

Globe Life has ultimate responsibility for and oversight of these materials and any assertion by the company to the contrary is false. We also reject the idea that Globe Life is not aware of the training materials being produced by their largest and most successful SGAs for training agents.

Some of these practices may also be in breach of NAIC Model Regulation 880 on unfair trade practices regarding misrepresentations.



Section 3. Unfair Trade Practices Prohibited

It is an unfair trade practice for any insurer to commit any practice defined in Section 4 of this Act if:

- A. It is committed flagrantly and in conscious disregard of this Act or of any rules promulgated hereunder; or
- B. It has been committed with such frequency to indicate a general business practice to engage in that type of conduct.

Section 4. Unfair Trade Practices Defined

Any of the following practices, if committed in violation of Section 3, are hereby defined as unfair trade practices in the business of insurance:

- A. Misrepresentations and False Advertising of Insurance Policies. Making, issuing, circulating, or causing to be made, issued, or circulated, any estimate, illustration, circular or statement, sales presentation, omission or comparison that:
 - (1) Misrepresents the benefits, advantages, conditions, or terms of any policy; or
 - (2) Misrepresents the dividends or share of the surplus to be received on any policy; or
 - (3) Makes a false or misleading statement as to the dividends or share of surplus previously paid on any policy; or
 - (4) Is misleading or is a misrepresentation as to the financial condition of any insurer, or as to the legal reserve system upon which any life insurer operates; or
 - (5) Uses any name or title of any policy or class of policies misrepresenting the true nature thereof; or
 - (6) Is a misrepresentation, including any intentional misquote of premium rate, for the purpose of inducing or tending to induce the purchase, lapse, forfeiture, exchange, conversion or surrender of any policy; or
 - (7) Is a misrepresentation for the purpose of effecting a pledge or assignment of or effecting a loan against any policy; or
 - (8) Misrepresents any policy as being shares of stock.

Figure 4 – NAIC Model Regulation 880

Note: Unless otherwise specified, all passages in quotation marks are from transcriptions of videos from the Keefer Success website. Emphasis has been added by Viceroy.



1. False claims made by AIL representatives

Limitation of programs to union members - FALSE

Agents are routinely told to misrepresent the exclusivity and nature of AIL's programs. This usually involves making up programs that do not exist or stating that AIL's policies are discounted exclusively for union members.

These statements are also likely **illegal** in states that have adopted NAIC's Model Regulation 570 which prohibits this practice of making false statements about exclusivity.

- T. **Introductory, Initial or Special Offers and Enrollment Periods**
- (1) An advertisement of an individual policy or combination of policies shall not state or imply that the policy or combination of policies is an introductory, initial or special offer, or that applicants will receive substantial advantages not available at a later date, or that the offer is available only to a specified group of individuals, unless that is the fact. An advertisement shall not describe an enrollment period as "special" or "limited" or use similar words or phrases in describing it when the insurer uses successive enrollment periods as its usual method of marketing its policies.

Figure 5 – NAIC Model Regulation 570

*"Now that you've got great medical coverage, but Karen has nothing. **You have great life insurance benefits, but Karen has nothing. So now they've got a program for the spouses of firefighters.** When I get the information on this, do you want me to get that out to you"*

Rick Altig – 8 Ways

*"What they're actually going to allow you to do is they're actually going to allow **you to sponsor up to three family members or friends to take advantage of these same union discounted life insurance benefits without even being in a union or even paying any union dues.** And really, the most the people that usually what people do is they'll sponsor their close family members or friends initially. So who's one of the very first people that you can think of that would need to have the benefits of my freedom of choice. **And then I want to collect referrals after the sale.** That's the key part. And that's what we did not do last night."*

Tommy Vena presentation dated March 9, year unknown

first part is the child safe kits. They are ID kits that hold the children's vital information that's needed to start a search, God forbid they ever went missing. The second part of the program are some exclusive benefits that are normally only offered to our police and fireman unions, but they actually unlocked the benefits to the community as a way of thanking you for protecting their children. Does that make sense?

Figure 6 – Arias Agent Playbook 2024



American Income Life runs limited enrollment periods - FALSE

Agents claim that American Income Life runs limited enrollment periods which is patently untrue. According to NAIC model regulations, the term “enrollment period” is not to be used unless there is a lapse of some number of months, varying by state, between enrollment periods.

- (4) An enrollment period during which a particular insurance policy may be purchased on an individual basis shall not be offered within this state unless there has been a lapse of not less than [insert number] months between the close of the immediately preceding enrollment period for the same policy and the opening of the new enrollment period. The advertisement shall specify the date by which the applicant must mail the application, which shall be not less than ten (10) days and not more than forty (40) days from the date on which the enrollment period is advertised for the first time. This regulation applies to all advertising media—i.e., mail, newspapers, radio, television, magazines and periodicals—by any one insurer or insurance producer. The phrase “any one insurer” includes all the affiliated companies of a group of insurance companies under common management or control. This regulation does not apply to the use of a termination or cutoff date beyond which an individual application for a guaranteed issue policy will not be accepted by an insurer in those instances where the application has been sent to the applicant in response to his or her request. It is also inapplicable to solicitations of employees or members of a particular group or association that otherwise would be eligible under specified provisions of the insurance code for group, blanket or franchise insurance. In cases where insurance product is marketed on a direct mail basis to prospective insurance by reason of some common relationship with a sponsoring organization, this regulation shall be applied separately to each sponsoring organization.

Figure 7 – NAIC Model Regulation 570

The use of the term enrollment period appears to be an institutional practice at American Income Life as part of its high-pressure sales tactics.

*“I want to think about it. Well, I can understand that a lot of the members we see feel that way, but we try to explain, as I mentioned you before, **that we're only supposed to see each union member once per enrollment, and our enrollments run about every three to four years.** Now, I know how much you guys like the program and how much your family needs it.”*

Keefer Success – Close 2

*“And even if a person says to you, well, gosh, I can't afford anything. I can't even set aside anything. Then I always just respond, well, at least do a dollar Ming, at least dollar one, and get it started. **Then in two years, when they have the next enrollment, you can go ahead and add more coverage.**”*

Rick Altig – Objections into sales

A script memorization quiz uploaded to Quizlet in 2018 goes as far as to say:

*“This next part is critical. In order to receive the additional benefits, there are three criteria that must be met in order to qualify for the program. **First, you need to be a member of the union or be sponsored by someone who is,** which you are so there's no need to worry there. **The second criteria is, you need to enroll into the program during the enrollment period, which is right now while I'm sitting with you.** The third criteria, which is the most critical, is that you need to be in good health. In fact, a lot of families we meet with want and need the program, but don't actually qualify due to their health.”*

Quizlet – American Income Life Script Study



Claims that a decision must be made today – FALSE

Agents routinely tell customers they must sign up immediately, claiming that the offer is time limited. This is false - AIL encourages agents to follow up with undecided leads. This practice violates FTC laws² **and is illegal** in states that have adopted NAIC Model Regulation 570, as well as in Pennsylvania³ and Ohio⁴, the states with the largest Arias Agencies presence.

(37) State or imply that a prospective policyholder must purchase a policy immediately upon initial contact by agent or lose the opportunity to purchase that policy.

31 Pa. Code § 87.26 - Implying limited availability of policy

[State Regulations](#) [Compare](#)

A life insurance company, solicitor, broker, agent or representative may not state or imply that only a limited number of persons, or a limited class of persons will be eligible to buy a particular kind of policy, unless the limitation is related to recognized underwriting practices and may be verified by the underwriting practices of the insurance company.

Figure 8 & 9 – Ohio Administrative Code Rule 3901-6-01 & Pennsylvania Code Title 31 § 87.26

*“On the flip side, if once I go through these benefits, you think, wow, they're great benefits, but they don't really feel a need for me and my family today, then we actually ask you not to try to qualify either way. Yes or no? **That decision does have to be made today. In fairness to all, the other members are still waiting to enroll. So the good thing about it, Austin, is it's pretty much a no brainer.**”*

James Keefer – Shut Up and Close

*“On the flip side, as you go through the program, you nod in your head, you think, wow, these are great benefits, but they don't fit a need for me and my family. Then we actually ask you not to apply. **But either way, a decision does have to be made today.**”*

Tommy Vena – No Cost Referrals

*“You know what I mean? **You have to get an agreement but either way that decision has to be made today.** Right, Dustin? Yes, sir. Makes sense. You with me there? Yeah, that makes sense to you? Okay, good.”*

Bulldog – Closing

Number of referrals limited to arbitrary metrics - FALSE

To create an illusion of exclusivity, agents are trained to claim referrals are limited based on arbitrary metrics like years of service in the union or cans of food donated. There is also the mention of referrals receiving \$10,000 or \$1,000 gift certificates which we have been unable to confirm, though it appears this is a misleading way of describing the “stupid ass no cost benefits” agents will use to “get the bug in their ear about dying” with referrals⁵. Agents appear to make up their own version of the referral qualification script.

*“In fact, would you want to call him right now and find out what a good time I can explain the program to him? Sure, that would be great. Next, I'm going to never ask for referrals in a home. **Never ever ask for referrals. Always ask for food.** That's what you want to do is ask for food. Because one of the biggest challenges that the company has right now is that a lot of members want to be able to get their family and friends into the American Income benefits. **So now what they've said is that for every can of food that you donate to the food**”*

² <http://uscode.house.gov/view.xhtml?req=granuleid%3AUSC-prelim-title15-chapter2-subchapter1&edition=prelim>

³ <https://casetext.com/regulation/pennsylvania-code-rules-and-regulations/title-31-insurance/part-iv-life-insurance/chapter-87-requirements-for-certain-life-insurance-policies-and-sales-practices/sales-practices/section-8728-reference-to-payment-as-deposit>

⁴ <https://casetext.com/regulation/ohio-administrative-code/title-3901-department-of-insurance/chapter-3901-6-life-insurance/section-3901-6-01-solicitation-of-life-insurance-and-or-annuity-contracts?searchWithin=true&listingIndexId=ohio-administrative-code.title-3901-department-of-insurance.chapter-3901-6-life-insurance&q=deposit&type=regulation&sort=relevance&p=1>

⁵ A verbatim quote from James Keefer in AIL training materials.



bank, they're going to allow you to have one \$10,000 dollar gift certificate or one \$1,000 gift certificate to give to a friend or loved one that you care about. And then they're eligible for the American Income benefits."

Rick Altig – 8 Ways

"What separates you from him? Three years with the union, what's that mean? You get to give away \$3,000 or \$6,000 more benefits, right. For every year of service to your union, or every year of service to american income, or every year of service to this, you're allowed to donate a \$2,000 insurance policy to a family member or friend."

Zach Hart – 2011 presentation

Provision of non-cash gifts such as these benefits to be given to friends and family is legal under NAIC's MO-880 only if a) the customer is not required to purchase a policy in exchange and b) the cost does not exceed an amount determined to be reasonable by the commissioner.

A drafting note in MO-880 states that the recommended threshold for 'reasonable amount' is the lesser of 5% of policyholder premium or \$250⁶.

Either AIL agents are being instructed to provide inducement in clear breach of this part of the model regulation adopted by many states, or they are being instructed to lie about the value of the benefits being offered as inducement for insurance leads.

The needs analysis costs "thousands of dollars"

Agents are taught to claim the Needs Analysis performed by the eAPP to calculate appropriate coverage levels would cost "thousands of dollars" from a financial advisor. We seriously doubt this is the case as other scripts indicate that the needs analysis simply uses 3 years income as the starting point for coverage.

"And really what it does, it takes into consideration what you currently have, and it will actually show you if you have any gaps in your coverage or your situation. And if you have a few gaps, it will recommend a few things. If you don't have any gaps, it really won't recommend anything for you. But the best thing about it is if you were to actually go to, let's say, a financial advisor, and what they found is for our members that visited a financial advisor, it typically costs hundreds, sometimes even thousands of dollars."

Tommy Vena – No Cost Referrals

"Okay, let me show you the next part. The next part is the needs analysis, your final no cost benefit. The thing I like about the needs analysis is that it's usually done by a financial advisor and they charge a lot of money for that. Okay. But since you're with union, we're doing it at no cost for you."

James Keefer – Shut Up and Close

⁶ <https://content.naic.org/sites/default/files/model-law-880.pdf>



2. Misrepresentations

Agents misrepresenting themselves as union representatives

Agents misrepresenting themselves as union representatives. This appears to be such a problem that multiple speakers from different agencies joke about every agent having impersonated a union official at some point in their careers.

*“We have scripts for a reason, to follow protocols so you don't get in trouble. **You don't want to have PR down your throat because you said that you belong to the Teamsters. You've all done it. Yeah, this is Bill with the Teamsters shade balls. You're not. You work with American Income Life, right?**”*

Zach Hart – Presentation 2

*“Hi, I'm John with the union. **You guys are laughing like none of you guys have done it. Guys, come on. Be honest with yourself. Hi, John. I'm Marcus with American Income Local 277. Handling your benefits through the Teamsters union, much different deal. Okay.**”*

Marcus Smith – Presentation part 3

Replacing existing policies without NAIC procedure

Agents are instructed to replace policies in contravention of Globe Life stated policy on avoiding policy replacements. The script does not inform the customer about the ramifications of replacing their policy, including surrender fees, or outline the NAIC procedure for policy replacement.

“But anyway, I show them that in the policy, and then I say, well, Joe, don't worry, you're just like a lot of daily families I've met with, and I've done this over a thousand times. I'm going to help you with this, okay? I'm going to help you out with this. Before you ask for my help, I'm going to say, Joe, don't feel bad, okay?...”

I'm going to walk you through the process of getting your money before they get it, before they take it out, okay? If you have debts, if you have car payments, if you have loans, okay, I'll show you how using that can cash value to pay off high interest debt. Okay, we'll get you out of debt, will prevent you from paying hundreds of dollars a month for credit cards, okay? And because throughout this process, you won't have the life insurance coverage anymore, we'll get you something permanent to cover your final expenses and cover what your needs are, okay?

But first, do you have any debts that are around? You want to try to get their recent statement and try to get like a recent cash value statement and see whatever their cash value is and say, Joe, do you have any debts that are around \$10,000? Okay, let's start with the high interest ones first. Okay. Then help them to determine what their debts are, what their high interest debts are. Okay, so what you're going to do when you cash in this policy is take that money, pay off your credit cards, find out how much they're paying each month for all these different debts...

So that essentially gives you \$665 a month to play with, okay? Now they might want to buy a new car. That new car is gonna be \$300 a month. So now you got \$365 to deal with. But you got a really happy ass client. Okay? So the next step, I would say after I say now I'm doing this. Joe, obviously you're not going to have life insurance anymore, but by keeping this policy, you won't have life insurance anymore and you won't have your cash value, okay? So we're saving you over \$10,000 by getting your cash value before it's ripped out and eaten up and chewed up, okay? First, I need to see if you qualify. That's, that's the takeaway, Joe. As much as we need to do this, as much as your family needs this, I don't know if you qualify for it.”

James Keefer – On beating retirement plans, pensions, military and other policies



Misrepresenting when rates on policies go up

Agents are drilled to misrepresent to customers as to when rates on policies (term or whole life) will go up, insisting on the use of phrases like “pretty soon down the road” to obfuscate the value of whole life policies and deride term life policies.

*“He’s actually paying 18 on this one somewhere like that. **My only concern for you is that if we don’t do something pretty soon, my only concern for you is if we don’t do something pretty soon. Pretty soon. Pretty soon could be ten years. Pretty soon could be five years, pretty soon could be next month, okay? Does that make sense to you guys? You don’t want to get in and talk about, you know, eight years from now, that thing’s going to go up on you. What are they going to say at the end? Do it in eight years. I’ll go ahead and wait eight years, bro, come on back.**”*

Bulldog – POS 2

Misrepresenting the value of policies and when they pay out

Many of the strategies used to demonstrate the value of AIL’s policies misrepresent its actual value. The most egregious example is James Keefer’s “Magic Buckets” thought experiment which mischaracterizes completely how policies work.

- A customer with a policy cash value of \$16k higher than its lifetime premium payments could cash out the entire policy (effectively “making \$16k”) and die the following week, resulting in a full payout of the death benefit.
- The script neglects to mention that this scenario **only happens if the customer dies before the next premium payment is due.**
- Using the above as a springboard, the script then uses this “tripling” of paid in premium in 40 years to justify the sales tactic of the “magic bucket”, a bucket that **immediately** triples whatever money is put in there.

*“So it’s \$150,000 no matter how I die and when I die. Okay? Joe, I figured out that with all this cash value and all these paid-up options, I figured out that. Let’s say that I don’t die and I get to the age of 65, **I will have paid in \$44,000 to protect myself for 150,000. All right? My cash value at age 65 is going to be \$60,000. Okay? I know that because I look over here at age 65, it says my cash value CV will be \$60,900. All right? Now, Joe, that means that if I die in front of you, I’m protected for the \$150,000. No matter how I die. Let’s say I get to age 65, I’m still alive, and I want to do something with this policy, I figured out that I would have paid in 44,000.***

*And the company’s going to let me take back \$60,000. That’s \$16,000 more than I paid to the company. And they protected me for \$150,000 the whole time. **So I’m getting paid to have life insurance.** Imagine if you went into State farm after 40 years, never got in an accident, and you told the agent that you wanted to get all your money back, plus 16 grand. What are the chances that he’s going to laugh you out of the office? Pretty high, right? Okay, but that’s what we’re saying here. Okay, now, let’s say that I don’t want to take the money, okay? I want to give it all to my family when I die, but I don’t want to pay anymore. **I can freeze the policy at age 65 for \$128,700. That means that I only paid in 44,000 over all those years.***

*I was protected for \$150,000 the whole time, and I don’t have to pay anymore. When I die, my family is guaranteed to get \$128,700. So what happened here? Put 44,000 in, they get \$128,000. My money pretty much tripled. Right? **So, Joe, imagine if you could put \$100 into a bucket, and at the end of that month, that bucket just triples, and it turns into \$300 for your family.** Would you keep putting money in that bucket? They say, yes. I’m saying, Joe, God forbid that you die before that bucket fills up, your family gets a full bucket of money with 150 grand in it. That’d be a magic bucket, wouldn’t it? And they’re always. They laugh like, yeah, it is. What is this magic bucket?”*

James Keefer – Magic Buckets



Misrepresent that “most members are enrolling at this level”

Advise union members that “most members are enrolling at this level” when reviewing coverage options. Agents typically have no detailed data on which policy options are being selected by each group of policyholders and we doubt if this is true.

“They do this on an enrollment like basis. Like I told you, most members are enrolling at this level. However, you can increase it if you want to get in at a higher level. You know, that’s my rebuttal. What, are you doing this today? Yeah, they figured they’d do it on enrollment like basis. Most members are getting at this level. But you know, you can increase your program too if you guys want, right? Oh, no. I just. I just really wanted to think about it. Yeah...”

“None of these other bills are more important to your family. Everybody enrolls at this level anyways. I was just assuming you’re enrolling in the program like everybody else. I’m sorry, did we miss something?”

Tommy Vena presentation dated March 9, year unknown

Contingent beneficiaries used as leads

Beneficiaries and contingent beneficiaries are primarily thought of as leads for sales presentations, not in their capacity as policy beneficiaries. These leads are considered so valuable that the archived version of www.thekeefersuccess.com has an SMS ringtone called “Contingent Beneficiary...for goodness sake”⁷.

“So what you’re doing is you use the presold gold to schedule another appointment with every single person that does not buy the first time that you’re there. Now, when you go to a home and the person buys. What do you do? And think about it. The very best referral that you can get is from who? It’s from the contingent beneficiary. So when they put down their grown children as the contingent beneficiary and when something happens to both of them, then that’s the first referral that you’re going to go see. In fact, you know what I’m going to do is, Ron, I’m going to make sure I go see your son and let him know that you set him up as contingent beneficiary. In fact, he’s then eligible for these same benefits through American Income. Does that make sense?”

Rick Altig – 8 Ways

These are not simply words in a training video – this is precisely how AIL’s agents are behaving in the field. A complaint was made in Ohio following a November 2023 incident when an AIL agent contacted the children (contingent beneficiaries) of a policyholder without her permission, advising that they were beneficiaries of a life insurance policy, and trying to sell them insurance policies.

⁷

<https://web.archive.org/web/20180827070857/http://thekeefersuccess.com/AIL%20Audio/ContingentBeneficiaryForGoodnessSake.mp3>



On or around the 2 dates of Nov 13 14th someone from American Life contacted my son [REDACTED] telling them they are Beneficiaries on [REDACTED] policy (WHICH MY CHILDREN HAD NO CLUE I HAD A POLICY)and that there will be a video chat with myself my son and this person from A.L. I. calling them several times daily while doing work hours....My son called asking if I knew anything about these phone calls both my daughter and he is receiving. I said No.Kent proceeded to tell me that he was once again the Beneficiary on a policy and that they were trying to sell them Life Insurance.....I was leved and called the company myself asking what gives you the right to give out my information to my children and try to sell them a Life Insurance Policy.....Answer was ,it must have been agent or a teller marker end of answer...I requested a cancellation to send me a check..I have been with this company close to 14 years. NO CHECK. I am losing a lot of money cancelling this policy and I fill the was crossed once they gave out my personal information...This needs to stop. How many more people are they doing this to just to try to sell them insurance.....

Whatever can be done for American Life to STOP giving out private information and to be giving some kind of punishment bad ratings down graded.... Thank You, Mary.
[REDACTED]

High pressure fear tactics

High pressure and fear tactics are endorsed and commonplace with Keefer bragging about making a customer cry. All's use of high-pressure tactics is not news but it is concerning the extremes the training materials endorse them. According to Keefer, one of the only reasons for the "stupid ass no cost benefits" is to "get the bug in their ear about dying".

"The only reason we do no cost benefits is, number one, to have something to go there to talk to them about. Number two is to warm up and get the bug in their ear about dying. Okay. And number three is to collect referrals, all of them equally important. But we haven't established ourselves as an expert yet. So if you try to get policies and stuff like that, like, oh, why should I show it to you? You're just here to explain these stupid ass no cost benefits. Wait until you've shown them the life insurance video."

James Keefer – On beating retirement plans, pensions, military and other policies

"They're gonna be maybe a little upset. Drew, you know, I made it lady cry. Yeah, easy to do. Even with the videos, I don't. It might have been because her husband loved her so much or because I made his death so real, but that's what I think it was. Either way, she, like, caught up. She, like, cried. She left the room, had to walk away. Yeah. Okay. So, yeah, it happens. So don't be afraid of some confrontation. Okay, but do it in a respectful way. Okay. That I understand where you're at goes a long way. Okay. John, Mary, I'm in your home. And please, I mean no disrespect to you, okay? But. Da da. Okay. But Joe, you see when you die, how much of a problem that's gonna be for Mary? Yeah. Okay. So it's time to fix this problem now. Okay?"

James Keefer – Closing

Fabricated sob stories

Agents are advised to use "Third party" stories which are possibly fictitious sob stories designed to emotionally influence customers. Agents are advised to swap or use each other's stories or even make them up entirely to scare customers.

"And then you scare the crap out of them and give them a third-party story and then tell them. Every parent with kids under the age of 16 needs to have one of these kits in place. And then you press play, and then it asks for referrals. And then you don't have to. All you do is just say, so who do you know of kids and under age 16? We need to get the kids to go to because it could save a child's life. And then you roll into it."

Tommy Vena – Video Talk

"So those are my two third party stories, okay? Just to show that anything can happen, the unexpected can happen. If you don't have a third party story, get it from someone else. Get a story from someone else and



fricking make it up. I got tired of telling those stories. So one day, I stole Simon's third party story. He said, I had a cousin named Freddie. He's got it tattooed on his shoulder.

James Keefer – UL and third-party stories 2

*“Tell them a couple of stories. First time that I ran into that was when I moved up here and I was over in Ridgway, sat down with a lady. She had a heart attack at like 54 years old and she was dead. Anyhow, I tell this story to everybody when I go to the way to preeme. **It just so happens that the guy that was on the ambulance crew actually had a crush on her in high school. Ended up shocking her 17 times to bring her back to life. Well, it was good he brought her back to life because he was obsessed with her. But anyhow, he ended up rupturing her spleen. She has all these internal issues. She can't work anymore.**”*

Gilmore presentation



3. Known problems

The recordings also shed light on the widespread knowledge within AIL of the fraudulent and dishonest practices that have been reported by Viceroy and others. This includes:

Illegal policy replacements

Illegal policy replacements, where existing policies were being cashed out to pay the premium on new policies as part of POS policies. This is relayed by Keefer, the same person who walked agents through how to replace a customer's universal policy.

*"You could take \$20,000 out right now. Like, we don't do that. We try not to do that. Because if they do take money out, guess what it's called replacement. **So if you sell them a policy and then they take money out within six months, the company assumes that you told them to use that money to pay for the premium. Because agents were doing that a while ago. They messed it up for everybody. They were like, oh, it's real easy. They got 20,000 cash value and they're telling me they can't afford it. So I'm gonna tell them just to use their cash value to pay for it. So just so you know, I would not hype up them taking money out of their cash value because if they do, you're gonna get replacement.**"*

James Keefer – Keefer on POS 2023

Office alcohol use

Office alcohol use is part of "ALP parties" which appear to be Friday or Saturday night pre-booking sessions.

*"So we had an ALP party going all night. Sokol was like, what the heck are you talking about? Is there a party? Am I missing something? I'm like, no, you just wrote \$1,200. **You just brought a bottle of goose. That's perfect. Red Bull and vodka. ALP party, baby. Okay? We have them every day, all right? ALP parties. So I started off my ALP party that weekend with a deal for \$3,700 ALP, okay?"***

James Keefer – UL and third-party stories

Conclusion

Globe Life and American Income Life are fully aware that these sorts of practices are being taught as the key to success in their business. Lies, omissions, manipulation, and scare tactics are the norm, not the exception. It's no surprise that Globe Life's so-called "best" agents are under investigation by numerous federal agencies.

As always, more to come.



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.

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