

MAY 19 2015

## CIVIL PENALTY AND AGREEMENT

Minnesota Department  
of Commerce

May 13, 2015

David Kumatz  
Assistant General Counsel  
American General Life Insurance Company  
American General Center  
529S  
Nashville, TN 37250-0001

Re: Department of Commerce File Number: 37073

The Commissioner of Commerce is recommending that administrative action be taken against American General Life Insurance Company (NAIC # 60488), as well as its affiliates (collectively, the "Company") based on allegations that the Company has failed to provide a complete and/or timely response to the following Department of Commerce ("Department") requests:

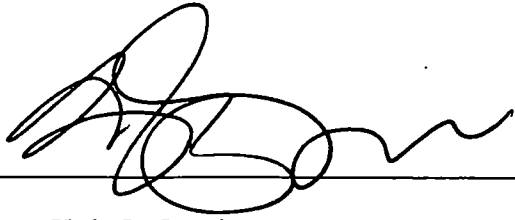
Since the commencement of the examination of the Company, the Department required production of comprehensive data related to annuity contracts and the Company's systems. These requests included, among other things, specifically certain pieces of information the Company was directed to produce including applications, policy statements, annual reports, and call recordings. The Company has yet to provide all required information.

The Company has agreed to resolve the Company's inadequate and late responses to the Department's examination requests by paying a civil penalty of \$10,000, and the Company is hereby released from any further liability for these issues. By signing this statement and paying the civil penalty **by May 15, 2015**, this specific issue will be resolved. Any requests for which the Company has not provided requested information or data remain outstanding. Failure to provide complete responses according to applicable deadlines in the future will be deemed an additional and separate violation.

With the Company's signing and the payment of the penalty, it agrees to the following:

1. That the violation as described occurred and it agrees to resolve it in this manner;
2. That it is aware of its right to a hearing and hereby waives that right;
3. That it has been advised of its right to legal counsel and that it has either had legal counsel or waives its right to legal counsel; and
4. That its check, payable to the State of Minnesota, accompanies this document.

American General Life Insurance Company  
and affiliates



---

By: Kyle L. Jennings

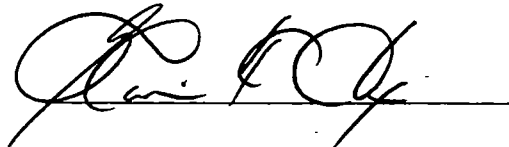
Its: Senior Vice President and Chief Compliance Officer

STATE OF TEXAS

COUNTY OF HARRIS

Signed before me on May 15, 2015 (date)

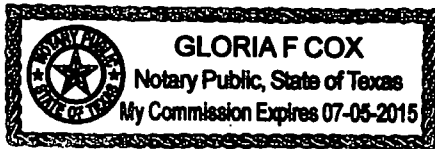
By: Gloria F. Cox  
(Respondent)



---

(Signature of Notary Officer)

(stamp)



Title (and Rank)

My Commission expires: 07-05-2015