



FAMILY **FIRST** LIFE

80 Norwich New-London Turnpike, Uncasville, CT 06382 | O: (860) 317-1324 F: (860) 400-3037

RE: Continuing To Be The Leader Of Change In Our Industry.

Just a few months ago, we discussed how FFL will continue to be the leader of positive change in the insurance industry so that our focus remains on our primary purpose: serving and protecting clients and their families. In my prior letter to you, we explained how this servant leadership position presents us with a unique opportunity to write the new playbook for how our industry approaches marketing, recruiting, and sales.

Because of your commitment to FFL and the insurance industry, we are making great progress in changing the way things are done to better serve our agents and the families they protect. In the past few months, FFL leadership and individual agents have coordinated to remove thousands of social media posts, comments, videos, website pages, and podcasts. Many agencies are self-monitoring and seeking FFL's advice on what to post or not to post. We want to personally thank every agent who has contributed to this extremely important call to be the change in the industry. We are and should be proud of our progress, but I want to challenge everyone to do *even more*.

We are asking you again to continue to monitor your websites, online posts, and public statements to make sure they comply with all the guidance FFL has provided and continues to provide, and to remove any material that does not completely follow that guidance. To ensure that FFL makes significant progress towards our compliance goals, we ask you to please take the following actions immediately and to ask your downlines who are also associated with FFL to do the same:

- Remove or make private all social media posts (Facebook, Instagram, TikTok, Twitter, LinkedIn, etc.), YouTube videos (or other videos hosted on any platform), podcast episodes, or similar FFL-related recruiting or marketing content that were posted prior to the 2022 FFL Convention (Feb. 1, 2022);
- Review the attached guidance and ensure that your statements conform to it (and set to private or remove any that do not); and
- Remove all job listings or posts on job search platforms that make any references to income or earnings.

Again, thank you for all you have done so far, and we are thanking you in advance for taking these next steps with us and complying with the instructions above.

In the near future, we will be rolling out new compliance initiatives including a compliance email account that you can email if you want to request the specific review of any marketing materials or report non-compliant material. FFL's core employees working on this matter will team up with our company attorneys to monitor this email account and ensure timely responses to assist you and your marketing representative or team.



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In addition, our team has worked hard on providing examples of compliant proposed terms and additional guidance as you will see in the enclosed detailed marketing guidelines. We also are in the process of designing a new and improved set of marketing, recruiting, and social media templates that will be available for all FFL independent contractors to use soon.

We cannot succeed in this mission without your full support and active participation throughout the organization, which is why each of you as FFL's independent contractors will play a critical role in our new compliance program. In the next few weeks, we will be rolling out terms and conditions for use of FFL resources and a social media policy. Violating these policies will have real consequences, including losing access to FFL's CRM and other resources. That is how seriously FFL takes its goal to be the best example of excellence in this industry.

Change is not always easy but as leaders in the industry we cannot allow ourselves to resort to the unethical tactics of our competitors. We know and agree with you that it is infuriating to watch our competitors mock our efforts to raise the industry bar yet again, but we will not go backwards. Others continue to engage in non-compliant or unethical tactics and attempt to exploit our progress towards compliance. Let me be clear: we intend to address this ongoing unacceptable conduct with enforcement authorities. That, however, does not change the fact that we must continue to take an industry-leading, aggressive approach to reach 100% compliance.

We will reach our goals and can only do so if we all remain fully engaged and motivated. I thank each and every one of you for your continued efforts.

Very truly yours,

Shawn L. Meaike

President

ADDITIONAL GUIDANCE RELATED TO STATEMENTS INCLUDING VIDEOS, INTERVIEWS, Q&As, & SOCIAL MEDIA POSTS

Family First Life, LLC (“FFL”) remains dedicated to being the leader in the IMO industry in focusing on serving families. As part of that commitment, FFL continues to set the standard for regulatory compliance including taking aggressive efforts to monitor and audit statements in videos, social media posts, on websites, and during Q&As made by independent agents who are also advertising that they are associated with FFL (“FFL Agents”).

FFL previously provided guidance on a number of areas including specific guideposts related to the use of certain terms. Below is more specific guidance that FFL Agents must follow in making statements related to their work with FFL. Compliance with this guidance is a term and condition of your use or acceptance of FFL’s website, name, CRM system, training, and/or your receipt of any commissions or other compensation from any insurance carrier affiliated with FFL in connection with policies issued (collectively, “FFL’s resources”). Repeated violations will result in a loss of access to these resources.

➤ **Permissible Topics and Posts:**

- ◆ Praising agents for non-monetary successes such as:
 - Picture/name of agent “Passed Exam!”
 - Name of agent “served” or “protected” x number of families
 - Name of agent is a “high impact” agent
 - Name of agent is a weekend protector
- ◆ Training topics for online videos without making any claims about earnings/issue paid figures and without comparison to other opportunities such as:
 - Information about licensing for new independent contractors
 - Information related to how independent contractors get appointed with insurance carriers
 - Information about lead vendors (without any suggestion that purchasing leads will lead to certain results)
 - Information about setting appointments (without any suggestion that setting appointments will lead to a particular result)
 - Information related to carrier products (without any discussion of contracting levels or issue paid or how the sales of carrier products affect compensation)
 - **You can say:** “Carrier contract rates up to 145%.”
 - Information about teamwork within your upline/downline
 - Information about meetings, training, and dial days (without any suggestion that attendance will lead to a particular result)
 - Information on how to become more effective in sales (without any suggestion that specific strategies will lead to a particular result)
 - Information about how to build a business and maintain a strong team mindset (without any suggestion that anyone can build a successful business)
 - Information and ideas related to strong work habits and scheduling (without suggesting any guaranteed or likely results)
 - Information about what it’s like working with FFL (without any suggestion that FFL agents will experience certain results or enjoy a certain wealthy lifestyle)

- **You can say:** FFL pays out monthly bonuses based on team and personal production numbers.
- ♦ Stories about connecting with people/families and serving people/families
- ♦ Unique non-compensation aspects of FFL such as:
 - FFL agents are not captive agents.
 - FFL offers free training.
- ♦ General descriptions of affiliating with FFL/working as an independent insurance agent through the use of hashtags such as:
 - #familyfirstlife
 - #FFL
 - #insuranceagent
 - #insurancebroker
 - #insurancetips
 - #salesmentor
 - #telesales
 - #workyourownschedule
 - #lifeinsurance
 - #protectfamilies
 - #Bestbusinesssever
 - #BBE
 - #dialday
 - #training
 - #growth
 - #team
 - #ffltakeover
 - #ffloppportunity
 - #wintogether
 - #lifeinsuranceagentsneeded
 - #goals
 - #lifeinsuranceagentswanted
 - #entrepreneur
 - #weekendwarriors
 - #winwithffl

➤ Prohibited Topics and Posts:

- ◆ Statements or claims about or related to earnings or profits (even if they are just goals) such as:
 - “You are able to make thousands of dollars from anywhere in the world!”
 - Images of check deposits or money
 - “FFL made me a millionaire”
 - My goal is to make “\$1 million this year.”
 - “I’m going to show you how to make a lot of money.”
 - “I’m going to buy leads, set 30-40 appointments, and make \$10k a week.”
 - Lists of producers and amounts they have earned (including, but not limited to, statements about issue paid totals)
 - Agent spotlight or profile stating any claims related to producers saying what they have earned (including, but not limited to, statements about issue paid totals)
- ◆ Statements connecting compensation to carrier contract rates such as:
 - “Starting commission 90-145%”
 - “Comp up to 145%.”
 - “High profitability/145% Commission”
 - “HIGHEST COMPENSATION: Highest compensation in the industry. Starting 95%, and ability to earn up to 145%. PLUS Bonuses on top of that.”
- ◆ Any image of or reference to FFL’s promotional guidelines based on issue paid figures.
- ◆ Anything that suggests that working with FFL will change your financial situation such as:
 - Hashtags about money or financial freedom like:
 - #financialfreedom
 - #incomereplacement
 - #money
 - #millionairemindset
 - Statements about how FFL can or did change your life like:
 - “change your situation”
 - “I went from -\$10,000 to when I got started to debt free & FFL made me a millionaire.”
 - “90% of Agents came from other industries with no prior experience and have seen Massive success with FFL following the steps of Top Producers.”
 - Suggestions you can build “generational wealth” or are earning enough to support your own family.
 - Any references to your bank account; images of checks; money emojis
- ◆ Anything that suggests that you can make more at FFL rather than at another IMO or at another job such as:
 - “In ONE DAY, he made what some make in an entire year.”
 - “I joined FFL after working for another IMO and the commissions are night and day.”

- ◆ Any suggestion that “anyone can do this” or “anyone can succeed” such as:
 - “You can be next!”
 - “Anyone can do this if they put in the work.”
 - Hashtags suggesting anyone can do this or succeed like:
 - #OpportunityUnlimited
 - #anyonecandothis
- ◆ Any suggestion that agents can be profitable with continued investment into leads such as:
 - “If you just keep doing it, it’s going to pay off.”
 - “It’s a numbers game.”
 - “You know the numbers always work out.”
 - “For 100 leads, I know for me personally, I can take that investment and book 15 appointments and I let the numbers do the job.”
 - “Buying leads is printing money.”
- ◆ Any suggestion that an independent agent is an employee such as:
 - Recruiting through any channel that requires a salary to be listed (i.e., ZipRecruiter)
 - Statements about hiring like:
 - “Looking to hire...”
 - “We are hiring!”
 - Hashtags about hiring like:
 - #jobs
 - #hiring
 - You can suggest that affiliating with FFL is an “opportunity.”
- ◆ Ineffective disclaimers such as:
 - “Disclaimer: this is not a promise.”
 - “Disclaimer in case my attorney’s watching or something.”
 - “And, as a disclaimer, do not listen to me.”