

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

February 8, 2013

<u>Via E-mail</u> Mr. Ted M. Johnson Chief Financial Officer and Treasurer American Equity Investment Life Holding Company 6000 Westown Parkway West Des Moines, Iowa 50266

Re: American Equity Investment Life Holding Company Form 10-K for the Fiscal Year Ended December 31, 2011 Filed March 1, 2012 File No. 001-31911

Dear Mr. Johnson:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Gus Rodriguez

Gus Rodriguez Accounting Branch Chief