

PROHIBITED TRANSACTION EXEMPTION 84-24 DISCLOSURE STATEMENT

This disclosure is being made to satisfy the requirements and conditions of the U.S. Department of Labor Prohibited Transaction Exemption 84-24. This disclosure provides important information for you to consider in determining whether to purchase the recommended annuity contract with IRA or other assets subject to Title I of ERISA.

Product: _____

Impartial Conduct Standards

At the time of the recommendation the advice given to you by the producer is believed to be in your "best interest". This means the advice reflects the care, skill, prudence, and diligence under the circumstances prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on your risk tolerance, investment objectives, financial circumstances, and needs without regard to the financial or other interest of the producer.

Fees and Charges

Any charges or fees which may be imposed under the recommended contract, including any surrender charges or rider fees, in connection with the purchase, holding, exchange, termination, or sale have been disclosed to you in the form of product brochures or other materials produced by the Insurance company issuing the contract or the producer recommending the product.

Compensation

The producer will receive from the Insurance Company the following commissions, and in some cases, other compensation including reimbursement for travel, training, meals, entertainment and attendance at insurance company conferences. The commissions and any other compensation are paid by the insurance company and your entire premium will be credited to your accumulation value upon issue of your annuity contract.

_____ % of the _____ for the first guaranteed period of the Contract which includes commissions, bonuses and any other form of compensation;

_____ % of the _____ paid at the time of renewal if you elect another guaranteed period.

Additional incentives, if any, received by the producer from any third parties for your purchase of this annuity contract:

Affiliations and Limitations

The producer or representative is licensed in the state this annuity is being recommended in and is appointed by the insurance company to sell you this annuity. The producer or representative is not limited by any agreement with the insurance company to recommend any annuity or insurance contract.

Material Conflicts of Interest

The producer has a financial interest in the transaction being recommended, which could affect his or her best judgment as a fiduciary when recommending this product to you. Potential material conflicts of interest the producer may experience in providing investment advice to you are:

- Receipt of Commission
- Receipt of other Incentives
- Rollover Recommendations
- Product Recommendations

Acknowledgment of Disclosure and Approval of Transaction

Client Name (Print)

Client Signature

Date

Producer Acknowledgment

Producer Name (Print)

Producer Signature

Date