## Background

This arrangement is a financial technique used by executives who want either to reduce current taxable compensation or forego scheduled increases in compensation in exchange for tax free income in the future. The arrangement involves the purchase of a cash value life insurance policy, the owner of which is the executive.

## Funding

Using the funds resulting from the executive's compensation adjustment, the employer makes loans to the executive, who purchases a policy insuring the life of the executive or the executive and his or her spouse. Frequently, the employer will add matching or partially matching dollars to the funding pool. The arrangement is designed to be in compliance with the Final Split Dollar Regulations issued in September 2003 (68 FR 54336).

Promissory Notes: The loans associated with the arrangement are evidenced by a series of promissory notes between the employer and the executive, and the life insurance policy is assigned as collateral security for the loans. The loans are term loans, i.e., they are due at the end of a specific period of years; however, the promissory note calls for the acceleration of repayment should the executive die prior to the date of scheduled loan repayments.
Loan Interest: If the loan interest rate increases, the executive could be allowed to accrue the additional loan interest. The executive could also withdraw funds from his or her share of the policy values to make up the difference in the loan interest due. ${ }^{1}$.

As an additional benefit in some arrangements, the employer may choose to offset the executive's loan interest payments by way of a bonus.

If no interest or an inadequate rate of interest is charged on a loan, the IRS recharacterizes the loan into an "arms-length" transaction and imputes an interest rate that is deemed to have been received by
the lender and paid by the borrower. The AFR is determined by the length of the loan transaction, i.e., either the demand loan (blended annual rate), the short-term rate ( 3 years or less), the mid-term rate (over 3 years but not over 9 years), or the long-term rate (over 9 years).

So long as the loan interest rate is equal to or exceeds the Applicable Federal Rate, no further interest is imputed by the IRS on the transaction.

The loan interest rate for each new loan will likely be different, and each such loan must bear interest equal to or greater than the selected AFR in effect during the month the new loan is executed. Each new loan should be evidenced by its own promissory note.

## There are four ways to deal with unknown future loan interest rates:

1. If a bonus ${ }^{1}$ is paid to the executive to offset the loan interest, accept the risk: Changing interest rates may increase or decrease the amount of the bonus; however, the loan interest paid to the employer by the executive should provide a significant offset.
2. If the loan interest rate increases, the executive could be allowed to accrue the additional loan interest. The executive could also withdraw funds from his or her share of the policy values to make up the difference in the loan interest due.
3. Renegotiate the loans: Wait until a time when the AFR dips and recast the series of promissory notes into a new note at the reduced rate.
4. Consolidate all loans at the inception of the plan: In this case, the loaned funds in excess of the amount needed to pay the policy's initial premium should be reserved by the executive to pay the remaining stream of premiums. The employer may wish to consider requiring some form of custodianship for the reserved funds to be certain they are used for the intended purpose.
[^0]
## AFRs in effect for May 2019

Long-term loans (over 9 years): 2.74\%
Mid-term loans (over 3 years; not over 9): 2.37\%
Short-term loans (3 years or less): 2.39\%
Demand loan (blended annual rate): 2.03\%

## Severance Benefits for the Executive

A severance benefit between the employer and the executive that mirrors the compensation adjustments used to the fund the arrangement is illustrated in the accompanying reports. The presence of such a benefit should provide significant financial comfort to any executive who voluntarily reduces compensation in order to participate. Such a benefit would typically be in effect from the inception of the arrangement and protect the executive's compensation adjustments in case of unexpected death or separation from employment prior to retirement.

Specimen severance agreements for use by profit-making or tax exempt organizations are available subject to the approval of the participants' tax and legal counsel.

## Repayment of Loans from the Employer

In the event of the executive's death, the employer's loans are repaid from the life insurance policy's death benefit; otherwise, loan repayment is handled in one of the ways listed below. A check mark indicates the method illustrated in the accompanying material.

1. The executive uses personal funds to repay the loans from the employer. This produces favorable results for the employer as it is repaid loans that were originally established due to the executive's compensation adjustments. In this case, the executive's benefits occur solely from the life insurance policy values.
2. The executive uses personal funds to repay the loans from the employer; however, the loan repayments are used by the employer to fund a severance benefit for the executive in the amount of the executive's cumulative compensation adjustments. (The severance commitment is by way of a separate agreement.) This strategy
should be viewed equitably by the executive since, in addition to the life insurance policy values illustrated, severance is paid that typically approximates the cumulative amount of previous compensation adjustments. Should death occur first, the severance benefit is paid to the executive's personal beneficiaries.
3. The executive borrows against the policy or surrenders a portion of policy values to repay the loans from the employer. This also produces favorable results for the employer as it is repaid loans that were originally established due to the executive's compensation adjustments. In this case, the executive's benefits occur solely from the life insurance policy values.
4. The executive borrows against the policy or surrenders a portion of policy values to repay the loans from the employer. The loan repayments are then used by the employer to fund a severance benefit for the executive that typically approximates the cumulative amount of previous compensation adjustments. (The severance commitment is awarded by way of a separate agreement.) This strategy should be viewed equitably by the executive since, in addition to the life insurance policy values illustrated, the severance provides the recovery of the executive's compensation adjustment. Should death occur first, the severance benefit is paid to the executive's personal beneficiaries.
5. The employer provides a bonus that may be used to repay the loan. When this occurs, the executive typically borrows against the policy or surrenders a portion of policy values to offset the income tax on the bonus used to repay the loan. This strategy should be viewed equitably by the executive since, in addition to the remaining life insurance values, the bonus repays the cumulative amount of previous compensation adjustments. If a severance agreement is part of the arrangement, the severance commitment is generally considered to be fulfilled due to the bonus payment.
6. The employer provides a bonus that may be used to repay the loan and bonuses an additional amount that may be used to offset some or all of the resulting income tax. This strategy should be viewed very equitably by the executive since, in addition to the remaining policy values, he/she is paid a bonus equal to the cumulative amount of previous compensation adjustments plus the income tax on the bonus.

## Living Benefits for the Executive

The executive may, if the parties agree, have direct access to policy cash values in excess of the amount required to collateralize the loans from the employer. Such policy cash values are usually accessed via policy loans, withdrawals, or a combination of each. If the loans from the employer are repaid, the executive has unencumbered access to all the policy cash values.

## Death Benefits for the Executive's Beneficiaries

1. Income tax free death benefits from the executive's share of the life insurance policy's death benefit can produce income streams for the executive's family or liquidity to help offset death taxes.
2. If a severance benefit is in effect as discussed above, an additional lump sum death benefit is available for the executive's beneficiaries.

## Important Notes

A dramatic rise in loan interest rates at the maturity of a demand, short-term or mid-term loan may result in less-than-acceptable loan interest rates when the loan is renewed. When you are dealing with a financial arrangement of many years, long-term loans produce more stable interest rates that can be renegotiated downward should rates decline, but are capped at rates that are known as each loan is made. Due to this you may want to establish your arrangement using long-term loans.

IRC Section 409A should not apply to this arrangement unless the employer is bound by the agreement between the parties to forgive the loan, waive payments, etc.
Policy loans reduce cash values and death benefits, and the lapse of a policy with such loans could result in negative tax consequences. Be sure to consult with your own legal and tax advisers if you have any questions about this issue.

You should also consult with these advisers before entering into this or any other arrangement involving tax, legal, and economic considerations.

Care must be exercised if a hospital and a doctor employed by that hospital use replacewithhead due to the Medicare-Medicaid Anti-Kickback Rule and the Stark II Rules. A plan should be able to be designed that complies with these rules; however, be certain to consult with your own legal and tax advisers on these issues.

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

## Who Pays What - Who Receives What Flow Chart


${ }^{1}$ If the loan interest rate on each loan is equal to or greater than the Applicable Federal Rate established under IRC Sections 7872(f)(2)(A) and 1274(d), then no additional loan interest will be imputed to the Executive.
${ }^{3}$ An optional severance benefit for the executive is included in this illustration. See Employer's and Executive's Analysis of Optional Severance Benefit reports for details.
${ }^{2}$ For loan repayment and retirement income.

|  |  | Male <br> Age <br> 45 | Indexed UL Interest Rate 6.90\% | Initial Initial <br> Premium Death Benefit <br> 100,000 $2,108,137$ |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Year | Age | (1) <br> Policy Premium | (2) Net Policy Loan Proceeds | (3) <br> Year End <br> Accum <br> Value* | (4) <br> Year End Cash Value* | (5) <br> Death <br> Benefit |
| 1 | 45 | 100,000 | 0 | 91,713 | 30,430 | 2,199,850 |
| 2 | 46 | 100,000 | 0 | 190,004 | 129,585 | 2,298,141 |
| 3 | 47 | 100,000 | 0 | 295,197 | 235,684 | 2,403,334 |
| 4 | 48 | 100,000 | 0 | 408,152 | 349,588 | 2,516,289 |
| 5 | 49 | 100,000 | 0 | 529,687 | [1 472,093 | 2,637,824 |
| 6 | 50 | 100,000 | 0 | 660,618 | - 604,015 | 2,768,755 |
| 7 | 51 | 100,000 | 0 | 801,752 | - 746,161 | 2,909,889 |
| 8 | 52 | 0 | 0 | 854,595 | $\square 808,279$ | 2,962,732 |
| 9 | 53 | 0 | 0 | 911,370 | $\square 874,309$ | 3,019,507 |
| 10 | 54 | 0 | 0 | 972,367 | $\square 944,582$ | 3,080,504 |
| 11 | 55 | 0 | 0 | 1,037,916 | 1,019,386 | 3,146,053 |
| 12 | 56 | 0 | 0 | 1,108,363 | 1,099,108 | 3,216,500 |
| 13 | 57 | 0 | 0 | 1,189,243 | 1,189,243 | 3,297,380 |
| 14 | 58 | 0 | 0 | 1,276,369 | -1,276,369 | 3,384,506 |
| 15 | 59 | 0 | 0 | 1,370,318 | 1,370,318 | 3,478,455 |
| 16 | 60 | 0 | 0 | 1,471,319 | 1,471,319 | 3,579,456 |
| 17 | 61 | 0 | 0 | 1,580,079 | 1,580,079 | 3,688,216 |
| 18 | 62 | 0 | 0 | 1,697,365 | -1,697,365 | 3,805,502 |
| 19 | 63 | 0 | 0 | 1,823,958 | 1,823,958 | 3,932,095 |
| 20 | 64 | 0 | 0 | 1,960,429 | -1,960,429 | 4,068,566 |
| 21 | 65 | 385,000 | 1,385,292 | 2,478,800 | 1,024,244 | 3,132,381 |
| 22 | 66 | 0 | 135,000 | 2,647,634 | $\square$ - 978,600 | 3,086,737 |
| 23 | 67 | 0 | 135,000 | 2,835,311 | $\square \mathbf{- 9 4 1 , 0 7 5}$ | 1,451,431 |
| 24 | 68 | 0 | 135,000 | 3,034,981 | $\square \mathbf{- 9 0 4 , 2 8 3}$ | 1,420,229 |
| 25 | 69 | 0 | 135,000 | 3,247,402 | $\square 868,419$ | 1,388,004 |
| 26 | 70 | 0 | 135,000 | 3,473,384 | $\square 833,702$ | 1,354,709 |
| 27 | 71 | 0 | 135,000 | 3,714,297 | $\square 800,880$ | 1,283,739 |
| 28 | 72 | 0 | 135,000 | 3,971,291 | $\square \quad 770,454$ | 1,207,296 |
| 29 | 73 | 0 | 135,000 | 4,245,652 | $\square 743,023$ | 1,125,131 |
| 30 | 74 | 0 | 135,000 | 4,538,816 | $\square 719,306$ | 1,037,023 |
|  |  | 1,085,000 | 2,600,292 |  |  |  |

## 30 Year Summary

*This illustration assumes the nonguaranteed values continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a basic illustration from the issuing life insurance company.

| Cum. Policy Premiums | $1,085,000$ |
| :--- | ---: |
| Cum. Net Policy Loan Proceeds | $2,600,292$ |
| Cash Value | 719,306 |
| Death Benefit | $1,037,023$ |


|  |  | Male Age 45 | Indexed UL Interest Rate 6.90\% | $\begin{aligned} & \text { Initial } \\ & \text { Premium } \\ & 100,000 \end{aligned}$ | Initial Death Benefit 2,108,137 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Year | Age | (1) <br> Policy Premium | (2) Net Policy Loan Proceeds | (3) <br> Year End <br> Accum Value* | (4) <br> Year End Cash Value* | (5) <br> Death <br> Benefit |
| 31 | 75 | 0 | 135,000 | 4,852,414 | $\square \mathbf{7 0 0 , 1 7 8}$ | $\square$ 942,799 |
| 32 | 76 | 0 | 135,000 | 5,186,602 | - 685,005 | $\square 944,335$ |
| 33 | 77 | 0 | 135,000 | 5,542,714 | $\square \mathbf{6 7 4 , 2 8 6}$ | $\square \mathbf{9 5 1 , 4 2 2}$ |
| 34 | 78 | 0 | 135,000 | 5,922,147 | - 668,548 | $\square$ 964,655 |
| 35 | 79 | 0 | 135,000 | 6,326,390 | $\square 668,361$ | $\square$ 984,681 |
| 36 | 80 | 0 | 135,000 | 6,756,982 | $\square$ - 674,302 | 1,012,151 |
| 37 | 81 | 0 | 135,000 | 7,215,407 | - 686,843 | 1,047,613 |
| 38 | 82 | 0 | 135,000 | 7,703,312 | - 706,570 | 1,091,736 |
| 39 | 83 | 0 | 135,000 | 8,222,392 | $\square$ 734,062 | 1,145,182 |
| 40 | 84 | 0 | 135,000 | 8,774,296 | $\square 769,800$ | 1,208,515 |
| 41 | 85 | 0 | 135,000 | 9,360,084 | $\square 813,613$ | 1,281,617 |
| 42 | 86 | 0 | 135,000 | 9,981,318 | $\square$ - 865,773 | 1,364,839 |
| 43 | 87 | 0 | 135,000 | 10,639,270 | $\square \mathbf{9 2 6 , 1 9 8}$ | 1,458,162 |
| 44 | 88 | 0 | 135,000 | 11,334,615 | $\square \mathbf{- 9 9 4 , 1 4 0}$ | 1,560,871 |
| 45 | 89 | 0 | 135,000 | 12,068,033 | 1,068,785 | 1,672,186 |
| 46 | 90 | 0 | 135,000 | 12,839,709 | 1,148,748 | 1,790,733 |
| 47 | 91 | 0 | 135,000 | 13,665,401 | -1,248,142 | 1,794,758 |
| 48 | 92 | 0 | 135,000 | 14,553,345 | 1,373,473 | 1,810,074 |
| 49 | 93 | 0 | 135,000 | 15,514,462 | -1,533,846 | 1,844,135 |
| 50 | 94 | 0 | 135,000 | 16,562,560 | 1,741,163 | 1,906,789 |
| 51 | 95 | 0 | 135,000 | 17,714,166 | 2,009,950 | 2,009,950 |
| 52 | 96 | 0 | 135,000 | 18,947,559 | 2,316,382 | 2,316,382 |
| 53 | 97 | 0 | 135,000 | 20,268,748 | 2,664,261 | 2,664,261 |
| 54 | 98 | 0 | 135,000 | 21,684,195 | 3,057,735 | 3,057,735 |
| 55 | 99 | 0 | 135,000 | 23,200,852 | 3,501,318 | 3,501,318 |

1,085,000 5,975,292

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

Summary

| Male | Employer's | Executive's |
| :---: | :---: | :---: |
| Age | Tax Bracket | Tax Bracket |
| 45 | $0.00 \%$ | $45.00 \%$ |


| Year | Age | Lung Cancer Fund |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | (1) <br> Net Payment** | (2) <br> Annual Loan to Executive | (3) <br> Cumulative <br> Loan to <br> Executive** <br> Including <br> Accrued <br> Loan <br> Interest | (4) <br> Employer's <br> Cumulative <br> Charge to <br> Earnings**** |
| 1 | 45 | 0 | 100,000 | 102,740 | -102,740 |
| 2 | 46 | 0 | 100,000 | 208,437 | -208,437 |
| 3 | 47 | 0 | 100,000 | 317,289 | -317,289 |
| 4 | 48 | 0 | 100,000 | 429,557 | -429,557 |
| 5 | 49 | 0 | 100,000 | 545,497 | -545,497 |
| 6 | 50 | 0 | 100,000 | 665,314 | -665,314 |
| 7 | 51 | 0 | 100,000 | 789,345 | -789,345 |
| 8 | 52 | 0 | 0 | 814,604 | -814,604 |
| 9 | 53 | 0 | 0 | 841,242 | -841,242 |
| 10 | 54 | 0 | 0 | 869,339 | -869,339 |
| 11 | 55 | 0 | 0 | 898,897 | -898,897 |
| 12 | 56 | 0 | 0 | 930,089 | -930,089 |
| 13 | 57 | 0 | 0 | 963,014 | -963,014 |
| 14 | 58 | 0 | 0 | 997,683 | -997,683 |
| 15 | 59 | 0 | 0 | 1,034,298 | -1,034,298 |
| 16 | 60 | 0 | 0 | 1,072,877 | -1,072,877 |
| 17 | 61 | 0 | 0 | 1,113,646 | -1,113,646 |
| 18 | 62 | 0 | 0 | 1,156,744 | -1,156,744 |
| 19 | 63 | 0 | 0 | 1,202,204 | -1,202,204 |
| 20 | 64 | 0 | 0 | 1,250,292 | -1,250,292 |
| 21 | 65 | -1,250,292 | 0 | 0 | -1,250,292 |
| 22 | 66 | 0 | 0 | 0 | -1,250,292 |
| 23 | 67 | 0 | 0 | 0 | -1,250,292 |
| 24 | 68 | 0 | 0 | 0 | -1,250,292 |
| 25 | 69 | 0 | 0 | 0 | -1,250,292 |
| 26 | 70 | 0 | 0 | 0 | -1,250,292 |
| 27 | 71 | 0 | 0 | 0 | -1,250,292 |
| 28 | 72 | 0 | 0 | 0 | -1,250,292 |
| 29 | 73 | 0 | 0 | 0 | -1,250,292 |
| 30 | 74 | 0 | 0 | 0 | -1,250,292 |
|  |  | -1,250,292 | 700,000 |  |  |

An optional severance benefit for the executive is included in this illustration. See Employer's and Executive's Analysis of Optional Severance Benefit reports for details.
*See Promissory Note Analysis for assumed Applicable Fed. Rate.
**See appropriate Net Payment Analysis for details.
**A negative value indicates a credit to earnings.
****This illustration assumes the nonguaranteed values continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a basic illustration from the issuing life insurance company.

Employer: Lung Cancer Fund

| Indexed UL | Initial | Assumed |
| :---: | :---: | :---: |
| Interest Rate | Death Benefit | Applicable |
| $6.90 \%$ | $2,108,137$ | Federal Rate* |



Executive's 30 Year Summary

|  | Living Values $^{\dagger}$ |  | Death Benefit |
| :--- | ---: | ---: | ---: |
|  | 719,306 |  | $1,037,023$ |
| Indexed Universal Life: | 0 | 0 |  |
| Less Loan Due Employer: | 719,306 |  | $1,037,023$ |
| Equals Executive's Net Value: | $1,350,000$ |  | $1,350,000$ |
| Plus Cum. After Tax Cash Flow: | $2,069,306$ |  | $2,387,023$ |

$\dagger$ Cash value less employer's loans plus cum. net policy loans.

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

Summary


## -1,250,292 700,000

An optional severance benefit for the executive is included in this illustration. See Employer's and Executive's Analysis of Optional Severance Benefit reports for details.
*See Promissory Note Analysis for assumed Applicable Fed. Rate.
**See appropriate Net Payment Analysis for details.
**A negative value indicates a credit to earnings.
****This illustration assumes the nonguaranteed values continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a basic illustration from the issuing life insurance company.

Employer: Lung Cancer Fund

| Indexed UL | Initial | Assumed |
| :---: | :---: | :---: |
| Interest Rate | Death Benefit | Applicable |
| $6.90 \%$ | $2,108,137$ | Federal Rate* |


| Arthur Johnson |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| (5) <br> Net Payment** | (6) <br> Net Policy Loan Proceeds Available for Retirement Income | (7) <br> Year End Policy Accum Value**** | (8) <br> Year End Policy Cash Value**** | (9) <br> Year End Policy Cash Value**** Net of Loan Due Employer | (10) <br> Year End <br> Policy <br> Death <br> Benefit <br> Net of <br> Loan Due <br> Employer |
| 0 | 135,000 | 4,852,414 | 700,178 | 700,178 | 942,799 |
| 0 | 135,000 | 5,186,602 | 685,005 | $\square$ 685,005 | 944,335 |
| 0 | 135,000 | 5,542,714 | 674,286 | $\square \mathbf{6 7 4 , 2 8 6}$ | 951,422 |
| 0 | 135,000 | 5,922,147 | 668,548 | $\square 668,548$ | 964,655 |
| 0 | 135,000 | 6,326,390 | 668,361 | $\square 668,361$ | 984,681 |
| 0 | 135,000 | 6,756,982 | 674,302 | $\square 674,302$ | 1,012,151 |
| 0 | 135,000 | 7,215,407 | 686,843 | $\square 686,843$ | 1,047,613 |
| 0 | 135,000 | 7,703,312 | 706,570 | $\square$ 706,570 | 1,091,736 |
| 0 | 135,000 | 8,222,392 | 734,062 | $\square 734,062$ | 1,145,182 |
| 0 | 135,000 | 8,774,296 | 769,800 | $\square 769,800$ | 1,208,515 |
| 0 | 135,000 | 9,360,084 | 813,613 | $\square 813,613$ | 1,281,617 |
| 0 | 135,000 | 9,981,318 | 865,773 | $\square 865,773$ | 1,364,839 |
| 0 | 135,000 | 10,639,270 | 926,198 | $\square \mathbf{~ 9 2 6 , 1 9 8 ~}$ | 1,458,162 |
| 0 | 135,000 | 11,334,615 | 994,140 | $\square 994,140$ | 1,560,871 |
| 0 | 135,000 | 12,068,033 | 1,068,785 | 1,068,785 | 1,672,186 |
| 0 | 135,000 | 12,839,709 | 1,148,748 | 1,148,748 | 1,790,733 |
| 0 | 135,000 | 13,665,401 | 1,248,142 | 1,248,142 | 1,794,758 |
| 0 | 135,000 | 14,553,345 | 1,373,473 | 1,373,473 | 1,810,074 |
| 0 | 135,000 | 15,514,462 | 1,533,846 | 1,533,846 | 1,844,135 |
| 0 | 135,000 | 16,562,560 | 1,741,163 | 1,741,163 | 1,906,789 |
| 0 | 135,000 | 17,714,166 | 2,009,950 | 2,009,950 | 2,009,950 |
| 0 | 135,000 | 18,947,559 | 2,316,382 | 2,316,382 | 2,316,382 |
| 0 | 135,000 | 20,268,748 | 2,664,261 | 2,664,261 | 2,664,261 |
| 0 | 135,000 | 21,684,195 | 3,057,735 | 3,057,735 | 3,057,735 |
| 0 | 135,000 | 23,200,852 | 3,501,318 | 3,501,318 | 3,501,318 |

770,000 4,725,000

Executive's 55 Year Summary

|  | Living Values $^{\dagger}$ |  |  |
| :--- | ---: | ---: | ---: |
|  | Death Benefit |  |  |
| Indexed Universal Life: | $3,501,318$ |  | $3,501,318$ |
| Less Loan Due Employer: | 0 | 0 |  |
| Equals Executive's Net Value: | $3,501,318$ |  | $3,501,318$ |
| Plus Cum. After Tax Cash Flow: | $4,725,000$ |  | $4,725,000$ |
| Equals Executive's Net Value: | $8,226,318$ |  | $8,226,318$ |

$\dagger$ Cash value less employer's loans plus cum. net policy loans.

| Male | Executive's | Indexed UL |
| :---: | :---: | :---: |
| Age | Tax Bracket | Interest Rate |
| 45 | $45.00 \%$ | $6.90 \%$ |

Gross Interest Rate Required on a Hypothetical Taxable Investment
to Match Indexed Universal Life Policy Values Over 55 Years (Executive's After Tax Cost of the Plan Used as the Hypothetical Investment)

|  | Hypothetical <br> Taxable <br> Alternative |
| ---: | ---: |
| To match Cash Value of: $\$ 3,501,318$ | $14.98 \%$ |
| To match Death Benefit of: $\$ 3,501,318$ | $14.98 \%$ |




## Income Tax Considerations

1. Hypothetical Taxable Investment: Interest is taxed as earned.
2. Indexed Universal Life:
a. Death Benefit including available cash value component is income tax free.
b. Loans are income tax free as long as the policy is kept in force.
c. Withdrawals and other non-loan policy cash flow up to cost basis (not in violation of IRC Section 7702(A)) are income tax free as a return of premium.
d. Cash values shown assume most favorable combination of $b$ and/or c .

This illustration assumes the nonguaranteed values continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a basic illustration from the issuing life insurance company.

Values of the optional severance benefit illustrated with this plan are in addition to the values calculated above.

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life



${ }^{1}$ For retirement income.
An optional severance benefit for the executive is included in this

| Yr | Age | (1) <br> Comp. Adjustment by Executive | (2) <br> Employer's Gain from Comp. Adjustment | (3) <br> Loan to Executive | (4) <br> Loan <br> Repayment from Executive | (5) <br> Accrued Loan Interest | (6) <br> Employer's <br> Tax <br> on <br> Accrued Loan Interest | (7) <br> Payment Net Payment** $(3)-(2)-(4)+(6)$ | (8) <br> Employer's Annual Charge to Earnings** (6) - (5) - (2) | (9) <br> Employer's <br> Cumulative <br> Charge to <br> Earnings** |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 100,000 | 100,000 | 100,000 | 0 | 2,740 | 0 | 0 | -102,740 | -102,740 |
| 2 | 46 | 100,000 | 100,000 | 100,000 | 0 | 5,697 | 0 | 0 | -105,697 | -208,437 |
| 3 | 47 | 100,000 | 100,000 | 100,000 | 0 | 8,852 | 0 | 0 | -108,852 | -317,289 |
| 4 | 48 | 100,000 | 100,000 | 100,000 | 0 | 12,268 | 0 | 0 | -112,268 | -429,557 |
| 5 | 49 | 100,000 | 100,000 | 100,000 | 0 | 15,940 | 0 | 0 | -115,940 | -545,497 |
| 6 | 50 | 100,000 | 100,000 | 100,000 | 0 | 19,817 | 0 | 0 | -119,817 | -665,314 |
| 7 | 51 | 100,000 | 100,000 | 100,000 | 0 | 24,031 | 0 | 0 | -124,031 | -789,345 |
| 8 | 52 | 0 | 0 | 0 | 0 | 25,259 | 0 | 0 | -25,259 | -814,604 |
| 9 | 53 | 0 | 0 | 0 | 0 | 26,638 | 0 | 0 | -26,638 | -841,242 |
| 10 | 54 | 0 | 0 | 0 | 0 | 28,097 | 0 | 0 | -28,097 | -869,339 |
| 11 | 55 | 0 | 0 | 0 | 0 | 29,558 | 0 | 0 | -29,558 | -898,897 |
| 12 | 56 | 0 | 0 | 0 | 0 | 31,192 | 0 | 0 | -31,192 | -930,089 |
| 13 | 57 | 0 | 0 | 0 | 0 | 32,925 | 0 | 0 | -32,925 | -963,014 |
| 14 | 58 | 0 | 0 | 0 | 0 | 34,669 | 0 | 0 | -34,669 | -997,683 |
| 15 | 59 | 0 | 0 | 0 | 0 | 36,615 | 0 | 0 | -36,615 | -1,034,298 |
| 16 | 60 | 0 | 0 | 0 | 0 | 38,579 | 0 | 0 | -38,579 | -1,072,877 |
| 17 | 61 | 0 | 0 | 0 | 0 | 40,769 | 0 | 0 | -40,769 | -1,113,646 |
| 18 | 62 | 0 | 0 | 0 | 0 | 43,098 | 0 | 0 | -43,098 | -1,156,744 |
| 19 | 63 | 0 | 0 | 0 | 0 | 45,460 | 0 | 0 | -45,460 | -1,202,204 |
| 20 | 64 | 0 | 0 | 0 | 0 | 48,088 | 0 | 0 | -48,088 | -1,250,292 |
| 21 | 65 | 0 | 0 | 0 | 1,250,292 | 0 | 0 | -1,250,292 | 0 | -1,250,292 |
| 22 | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 23 | 67 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 24 | 68 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 25 | 69 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 26 | 70 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 27 | 71 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 28 | 72 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 29 | 73 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 30 | 74 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
|  |  | 700,000 | 700,000 | 700,000 | 1,250,292 | 550,292 | 0 | -1,250,292 | -1,250,292 |  |

[^1]*See Promissory Note Analysis for assumed Applicable Fed. Rate. See Preface for notes regarding loan interest rates.

| Male | Employer's | Assumed |
| :---: | :---: | :---: |
| Age | Tax Bracket | Applicable |
| 45 | $0.00 \%$ | Federal Rate* |

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

| Male | Employer's | Assumed |
| :---: | :---: | :---: |
| Age | Tax Bracket | Applicable |
| 45 | $0.00 \%$ | Federal Rate* |


| Yr | Age | (1) <br> Comp. Adjustment by Executive | (2) <br> Employer's Gain from Comp. Adjustment | (3) <br> Loan to Executive | (4) <br> Loan <br> Repayment from Executive | (5) <br> Accrued Loan Interest | (6) <br> Employer's <br> Tax <br> on <br> Accrued Loan Interest | (7) <br> Payment Net Payment** (3)-(2)-(4)+(6) | (8) <br> Employer's Annual Charge to Earnings** (6) - (5) - (2) | (9) <br> Employer's <br> Cumulative <br> Charge to <br> Earnings** |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 32 | 76 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 33 | 77 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 34 | 78 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 35 | 79 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 36 | 80 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 37 | 81 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 38 | 82 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 39 | 83 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 40 | 84 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 41 | 85 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 42 | 86 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 43 | 87 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 44 | 88 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 45 | 89 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 46 | 90 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 47 | 91 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 48 | 92 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 49 | 93 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 50 | 94 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 51 | 95 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 52 | 96 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 53 | 97 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 54 | 98 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |
| 55 | 99 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | -1,250,292 |

[^2]*See Promissory Note Analysis for assumed Applicable Fed. Rate. See Preface for notes regarding loan interest rates.

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

## Executive's Net Payment Analysis


*See Promissory Note Analysis for assumed Applicable Fed. Rate. See Preface for notes regarding loan interest rates.

Loan repayment presumed completed in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

## Executive's Net Payment Analysis

| Male | Executive's | Assumed |
| :---: | :---: | :---: |
| Age | Tax Bracket | Applicable |
| 45 | $45.00 \%$ | Federal Rate* |


| Year | Age | (1) <br> Compensation <br> Adjustment by <br> Executive | (2) <br> Executive's <br> After Tax Cost of Compensation Adjustment | (3) <br> Policy <br> Premium Due by Executive | (4) <br> Beginning of Year Loan from Employer | (5) <br> Executive's <br> Net Payment (2)+(3)-(4) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | 0 | 0 | 0 | 0 |
| 32 | 76 | 0 | 0 | 0 | 0 | 0 |
| 33 | 77 | 0 | 0 | 0 | 0 | 0 |
| 34 | 78 | 0 | 0 | 0 | 0 | 0 |
| 35 | 79 | 0 | 0 | 0 | 0 | 0 |
| 36 | 80 | 0 | 0 | 0 | 0 | 0 |
| 37 | 81 | 0 | 0 | 0 | 0 | 0 |
| 38 | 82 | 0 | 0 | 0 | 0 | 0 |
| 39 | 83 | 0 | 0 | 0 | 0 | 0 |
| 40 | 84 | 0 | 0 | 0 | 0 | 0 |
| 41 | 85 | 0 | 0 | 0 | 0 | 0 |
| 42 | 86 | 0 | 0 | 0 | 0 | 0 |
| 43 | 87 | 0 | 0 | 0 | 0 | 0 |
| 44 | 88 | 0 | 0 | 0 | 0 | 0 |
| 45 | 89 | 0 | 0 | 0 | 0 | 0 |
| 46 | 90 | 0 | 0 | 0 | 0 | 0 |
| 47 | 91 | 0 | 0 | 0 | 0 | 0 |
| 48 | 92 | 0 | 0 | 0 | 0 | 0 |
| 49 | 93 | 0 | 0 | 0 | 0 | 0 |
| 50 | 94 | 0 | 0 | 0 | 0 | 0 |
| 51 | 95 | 0 | 0 | 0 | 0 | 0 |
| 52 | 96 | 0 | 0 | 0 | 0 | 0 |
| 53 | 97 | 0 | 0 | 0 | 0 | 0 |
| 54 | 98 | 0 | 0 | 0 | 0 | 0 |
| 55 | 99 | 0 | 0 | 0 | 0 | 0 |


| 700,000 |
| :--- |
| 385,000 |
| $1,085,000$ |
| 700,000 |

*See Promissory Note Analysis for assumed Applicable Fed. Rate. See Preface for notes regarding loan interest rates.

Loan repayment presumed completed in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

## Promissory Note Analysis

|  | Assumed |
| :---: | :---: |
| Male | Applicable |
| Age | Federal Rate ${ }^{* *}$ |
| 45 | (See Col. 2) |


|  |  |
| :---: | :---: |


| O <br> 8 <br> 0 <br> 8 <br> 8 | 0000000000 | 0000000000 |  |  | E |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\omega \omega \omega \omega \omega \omega \mathrm{N}$ N N N <br>  |  | N |
|  | 0000000000 | 0000000000 | 0000000000 |  | W |
|  | 0000000000 | 0000000000 | 0000000000 |  | $\pm$ |
|  | 0000000000 | 0000000000 | 0000000000 |  | ज |
| N U N No N | $000000000 \text { N్N }$ | 0000000000 | 0000000000 |  | (0) |
|  | 0000000000 |  <br>  <br>  | NN NN N $\circ 0_{0}^{\circ} 0_{0}^{\circ} 0 \times{ }^{\circ}$ O |  | ミ |



| (9) |
| :---: |
| Policy |
| Accum |
| Value* |
| Net of |
| Loan Due |
| Employer |


(11)

Policy Death Benefit* Net of Loan Due Employer

| 2,09 |
| :---: |
| 2,08 |
| 2,086,0 |
| 2,086,732 |
| 2,092,32 |
| 2,103 |
| 2,120 |
| 2,148,12 |
| 2,178,2 |
| 2,211,1 |
|  |
| 2,286,41 |
| 2,334,366 |
| 2,386,82 |
| 2,444,15 |
| 2,5 |
| 2,574,5 |
| 2,648,75 |
| 2,729,89 |
|  |
| 3,132,38 |
| 3,086,737 |
| 1,451,43 |
| 1,420,229 |
| 1,388,004 |
| 1,354,709 |
| 1,283,739 |
| 1,207,2 |
| 1,125,1 |
| 1,03 |

**See Preface for notes regarding loan interest rates.
Loan repayment presumed completed in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

|  | Assumed |
| :---: | :---: |
| Male | Applicable |
| Age | Federal Rate ${ }^{* *}$ |
| 45 | (See Col. 2) |


| (1) <br> Loan to Executive | (2) <br> Assumed Applicable Federal Rate | (3) <br> Annual Loan Interest Paid from Non-Policy Values | (4) <br> Annual Loan Interest Paid from Policy Values | (5) <br> Loan <br> Repayments from Non-Policy Values | (6) <br> Loan Repayments from Policy Values | (7) <br> Accrued Loan Interest | (8) <br> Cumulative <br> Loan to Executive (Value of Promissory Note) | (9) <br> Policy <br> Accum <br> Value* <br> Net of Loan Due Employer | (10) <br> Policy <br> Cash <br> Value* <br> Net of <br> Loan Due <br> Employer | (11) <br> Policy <br> Death <br> Benefit* <br> Net of <br> Loan Due <br> Employer |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 4,852,414 | 700,178 | 942,799 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 5,186,602 | 685,005 | 944,335 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 5,542,714 | 674,286 | 951,422 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 5,922,147 | 668,548 | 964,655 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 6,326,390 | 668,361 | 984,681 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 6,756,982 | 674,302 | 1,012,151 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 7,215,407 | 686,843 | 1,047,613 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 7,703,312 | 706,570 | 1,091,736 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 8,222,392 | 734,062 | 1,145,182 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 8,774,296 | 769,800 | 1,208,515 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 9,360,084 | 813,613 | 1,281,617 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 9,981,318 | 865,773 | 1,364,839 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 10,639,270 | 926,198 | 1,458,162 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 11,334,615 | 994,140 | 1,560,871 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 12,068,033 | 1,068,785 | 1,672,186 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 12,839,709 | 1,148,748 | 1,790,733 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 13,665,401 | 1,248,142 | 1,794,758 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 14,553,345 | 1,373,473 | 1,810,074 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 15,514,462 | 1,533,846 | 1,844,135 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 16,562,560 | 1,741,163 | 1,906,789 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 17,714,166 | 2,009,950 | 2,009,950 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 18,947,559 | 2,316,382 | 2,316,382 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 20,268,748 | 2,664,261 | 2,664,261 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 21,684,195 | 3,057,735 | 3,057,735 |
| 0 | n/a | 0 | 0 | 0 | 0 | 0 | 0 | 23,200,852 | 3,501,318 | 3,501,318 |

[^3]0
1,250,292 550,292
*This illustration assumes the nonguaranteed values continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a basic illustration from the issuing life insurance company.
**See Preface for notes regarding loan interest rates.
Loan repayment presumed completed in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

## Employer's Analysis of

## Optional Severance Benefit

|  |  |  | $\begin{aligned} & \text { Male } \\ & \text { Age } \\ & 45 \end{aligned}$ | mployer's <br> x Bracket <br> 0.00\% |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Year | Age | (1) <br> Cumulative <br> Compensation <br> Adjustment <br> by <br> Executive | (2) <br> One-Time Severance Benefit Due to Executive or Executive's Beneficiaries* | (3) <br> Employer's One-Time Charge to Earnings Due to Severance | (4) <br> Employer's <br> Cumulative <br> Charge to <br> Earnings** <br> No <br> Severance | (5) Employer's Cumulative Charge to Earnings** Incl. One-Time Severance (3) $+(4)$ |
| 1 | 45 | 100,000 | - 100,000 | [ 100,000 | -102,740 | -2,740 |
| 2 | 46 | 200,000 | $\square$ 200,000 | $\square 200,000$ | -208,437 | -8,437 |
| 3 | 47 | 300,000 | 300,000 | 300,000 | -317,289 | -17,289 |
| 4 | 48 | 400,000 | 400,000 | 400,000 | -429,557 | -29,557 |
| 5 | 49 | 500,000 | 500,000 | 500,000 | -545,497 | -45,497 |
| 6 | 50 | 600,000 | 600,000 | -600,000 | -665,314 | -65,314 |
| 7 | 51 | 700,000 | 700,000 | 700,000 | -789,345 | -89,345 |
| 8 | 52 | 700,000 | 700,000 | 700,000 | -814,604 | -114,604 |
| 9 | 53 | 700,000 | 700,000 | 700,000 | -841,242 | -141,242 |
| 10 | 54 | 700,000 | 700,000 | 700,000 | -869,339 | -169,339 |
| 11 | 55 | 700,000 | 700,000 | 700,000 | -898,897 | -198,897 |
| 12 | 56 | 700,000 | 700,000 | 700,000 | -930,089 | -230,089 |
| 13 | 57 | 700,000 | 700,000 | -700,000 | -963,014 | -263,014 |
| 14 | 58 | 700,000 | 700,000 | 700,000 | -997,683 | -297,683 |
| 15 | 59 | 700,000 | 700,000 | 700,000 | -1,034,298 | -334,298 |
| 16 | 60 | 700,000 | 700,000 | 700,000 | -1,072,877 | -372,877 |
| 17 | 61 | 700,000 | 700,000 | 700,000 | -1,113,646 | -413,646 |
| 18 | 62 | 700,000 | 700,000 | 700,000 | -1,156,744 | -456,744 |
| 19 | 63 | 700,000 | 700,000 | -700,000 | -1,202,204 | -502,204 |
| 20 | 64 | 700,000 | 700,000 | 700,000 | -1,250,292 | -550,292 |

*Severance is conditional on a formal agreement between the parties. It is illustrated in yrs 1 thru 20 in the event of involuntary termination of employment - including death. Severance is assumed to be paid when the loan is repaid.

This is an illustration and not a contract. Severance is typically conditional upon a formal agreement between the parties.
**See Employer's Net Payment Analysis for details.
(A negative value indicates a credit to earnings.)

# Leveraged 401(k) Look-Alike Funded With Indexed Universal Life 

## Executive's Analysis of

## Optional Severance Benefit

| Male | Executive's |
| :---: | :---: |
| Age | Tax Bracket |
| 45 | $45.00 \%$ |


| Year | Age | (1) <br> Cumulative Compensation Adjustment by Executive | (2) <br> One-Time <br> Severance Benefit Due to Executive or Executive's Beneficiaries* | (3) <br> After Tax <br> Severance Benefit |
| :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 100,000 | - 100,000 | 55,000 |
| 2 | 46 | 200,000 | 200,000 | - 110,000 |
| 3 | 47 | 300,000 | 300,000 | $\square 165,000$ |
| 4 | 48 | 400,000 | 400,000 | 220,000 |
| 5 | 49 | 500,000 | 500,000 | 275,000 |
| 6 | 50 | 600,000 | 600,000 | 330,000 |
| 7 | 51 | 700,000 | 700,000 | 385,000 |
| 8 | 52 | 700,000 | 700,000 | 385,000 |
| 9 | 53 | 700,000 | 700,000 | 385,000 |
| 10 | 54 | 700,000 | 700,000 | 385,000 |
| 11 | 55 | 700,000 | 700,000 | 385,000 |
| 12 | 56 | 700,000 | 700,000 | 385,000 |
| 13 | 57 | 700,000 | 700,000 | 385,000 |
| 14 | 58 | 700,000 | 700,000 | 385,000 |
| 15 | 59 | 700,000 | 700,000 | 385,000 |
| 16 | 60 | 700,000 | 700,000 | 385,000 |
| 17 | 61 | 700,000 | 700,000 | 385,000 |
| 18 | 62 | 700,000 | 700,000 | 385,000 |
| 19 | 63 | 700,000 | 700,000 | 385,000 |
| 20 | 64 | 700,000 | 700,000 | 385,000 |

*Severance is conditional on a formal agreement between the parties. It is illustrated in yrs 1 thru 20 in the event of involuntary termination of employment - including death. Severance is assumed to be paid when the loan is repaid.

This is an illustration and not a contract. Severance is typically conditional upon a formal agreement between the parties.

## Leveraged 401(k) Look-Alike Funded With Indexed Universal Life

## Presented By: [Licensed user's name appears here]

Insured: Arthur Johnson
Arthur Johnson Severance Analysis
Employer: Lung Cancer Fund


At Year 20
One-Time After Tax Severance Benefit $\$ 385,000$

| Year | $\begin{aligned} & \text { Male e } \\ & \text { Age } \\ & 45 \end{aligned}$ |  | Executive's <br> Tax Bracket 45.00\% | Indexed UL Interest Rate 6.90\% |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Arthur Johnson Costs |  | Arthur Johnson Values |  |  |  |
|  | Age | (1) <br> Executive's Net payment* | (2) <br> Net Policy Loan Proceeds Available for Retirement Income | (3) <br>  <br> Executive's <br> Share of <br> Accum <br> Value ${ }^{* *}$ | (4) <br> Executive's <br> Share of <br> Cash <br> Value** | (5) <br> Executive's <br> Share of <br> Death <br> Benefit |
| 1 | 45 | 55,000 | 0 | 0 | 0 | 2,097,110 |
| 2 | 46 | 55,000 | 0 | 0 | 0 | 2,089,704 |
| 3 | 47 | 55,000 | 0 | 0 | 0 | 2,086,045 |
| 4 | 48 | 55,000 | 0 | 0 | 0 | 2,086,732 |
| 5 | 49 | 55,000 | 0 | 0 | 0 | 2,092,327 |
| 6 | 50 | 55,000 | 0 | 0 | 0 | 2,103,441 |
| 7 | 51 | 55,000 | 0 | 12,407 | 0 | 2,120,544 |
| 8 | 52 | 0 | 0 | 39,991 | 0 | 2,148,128 |
| 9 | 53 | 0 | 0 | 70,128 | 33,067 | 2,178,265 |
| 10 | 54 | 0 | 0 | 103,028 | 75,243 | 2,211,165 |
| 11 | 55 | 0 | 0 | 139,019 | 120,489 | 2,247,156 |
| 12 | 56 | 0 | 0 | 178,274 | 169,019 | 2,286,411 |
| 13 | 57 | 0 | 0 | 226,229 | 226,229 | 2,334,366 |
| 14 | 58 | 0 | 0 | 278,686 | 278,686 | 2,386,823 |
| 15 | 59 | 0 | 0 | 336,020 | 1 336,020 | 2,444,157 |
| 16 | 60 | 0 | 0 | 398,442 | - 398,442 | 2,506,579 |
| 17 | 61 | 0 | 0 | 466,433 | - 466,433 | 2,574,570 |
| 18 | 62 | 0 | 0 | 540,621 | - 540,621 | 2,648,758 |
| 19 | 63 | 0 | 0 | 621,754 | $\square 621,754$ | 2,729,891 |
| 20 | 64 | 0 | 0 | 710,137 | $\square 710,137$ | 2,818,274 |
| 21 | 65 | 385,000 | 135,000 | 2,478,800 | 1,024,244 | 3,132,381 |
| 22 | 66 | 0 | 135,000 | 2,647,634 | $\square 978,600$ | 3,086,737 |
| 23 | 67 | 0 | 135,000 | 2,835,311 | $\square 941,075$ | 1,451,431 |
| 24 | 68 | 0 | 135,000 | 3,034,981 | $\square 904,283$ | 1,420,229 |
| 25 | 69 | 0 | 135,000 | 3,247,402 | $\square 868,419$ | 1,388,004 |
| 26 | 70 | 0 | 135,000 | 3,473,384 | $\square 833,702$ | 1,354,709 |
| 27 | 71 | 0 | 135,000 | 3,714,297 | $\square 800,880$ | 1,283,739 |
| 28 | 72 | 0 | 135,000 | 3,971,291 | - 770,454 | 1,207,296 |
| 29 | 73 | 0 | 135,000 | 4,245,652 | $\square 743,023$ | 1,125,131 |
| 30 | 74 | 0 | 135,000 | 4,538,816 | $\square 719,306$ | 1,037,023 |
|  |  | 770,000 | 1,350,000 |  |  |  |

*Assuming all parties follow the procedure outlined on the Executive's Net Payment Analysis page.
**This illustration assumes the nonguaranteed values continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a basic illustration from the issuing life insurance company.

Loan repayment presumed completed in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

*Assuming all parties follow the procedure outlined on the Executive's Net Payment Analysis page.
**This illustration assumes the nonguaranteed values continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a basic illustration from the issuing life insurance company.

Loan repayment presumed completed in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.


[^0]:    ${ }^{1}$ If a bonus is used to assist with loan interest payments (or repayment of the employer's loans), care must be taken so as not to have the employer directly or indirectly make the loan interest payments (or loan repayments) on behalf of the executive. The purpose of this is to comply with the prohibition against the employer making such payments as provided in the split dollar final regulations issued in 2003 (TD 9092, 9/11/03 and Rev. Rul. 2003-105).

[^1]:    **A negative value indicates a credit to earnings.
    Loan repayment presumed completed in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

[^2]:    ${ }^{* *} \mathrm{~A}$ negative value indicates a credit to earnings.
    Loan repayment presumed completed in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

[^3]:    700,000

