# Exceptional Split Dollar

For: Max Bracey (Executive Vice President)



Presented	Ву:
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[Licensed User's Name Appears Here]

Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

**Preface** 

Major Privately-Owned Business

This executive fringe benefit involves a series of employer-sponsored loans to a valued executive for the purpose of purchasing a cash value life insurance policy.

**Promissory Notes:** The loans that are associated with this form of split dollar are evidenced by a series of promissory notes between the employer and the executive, and the life insurance policy is assigned as security for the loans. The loans are typically term loans, i.e., they are due at the end of 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:** The interest rate for each loan must bear interest equal to or greater than the Applicable Federal Rate (AFR) established under IRC Sections 7872(f)(2)(A) and 1274(d) at the inception of the loan. As an additional benefit, the employer may choose to offset the executive's loan interest payments by way of a second bonus<sup>1</sup>. Alternatively, loan interest may be accrued.

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 paid is equal to or exceeds the Applicable Federal Rate, no 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<sup>1</sup> 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 can be allowed to accrue the additional interest. Alternatively, 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 AFR dips and recast the series of promissory notes into a new note at the reduced rate.
- 4. Consolidate all loans to the executive at the inception of the plan. Although the loan involves a one-time transfer of funds from the employer to the executive, the life insurance policy in the accompanying material bears multiple scheduled premiums due to the more favorable taxation of policies not funded with a single premium. The funds in excess of the dollars needed to pay the policy's initial premium are reserved by the executive in a Premium Reserve Account (PRA) and used to pay the stream of multiple premiums required for the most favorable taxation of policy values. The employer may want to require some form of custodianship for the reserved funds to be certain they are used for the intended purpose.

#### **AFRs in effect for June 2018**

Long-term loans (over 9 years): 3.05%

Mid-term loans (over 3 years; not over 9): 2.86%

Short-term loans (3 years or less): 2.34% Demand loan (blended annual rate): 1.09%

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<sup>&</sup>lt;sup>1</sup> 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).

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Insured: Max Bracey (Executive Vice President)

Preface (continued)

Major Privately-Owned Business

#### 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 following ways. A check mark indicates the method illustrated in the accompanying material.

- 1. The executive uses personal funds to repay the loans from the employer.
- 2. The executive borrows against the policy or surrenders a portion of policy values to repay the loans from the employer.
- 3. The employer bonuses an amount to the executive to offset the repayment of the loans.
- 4. The employer grosses up bonuses to the executive to offset both the repayment of the loans and the tax on the bonus.

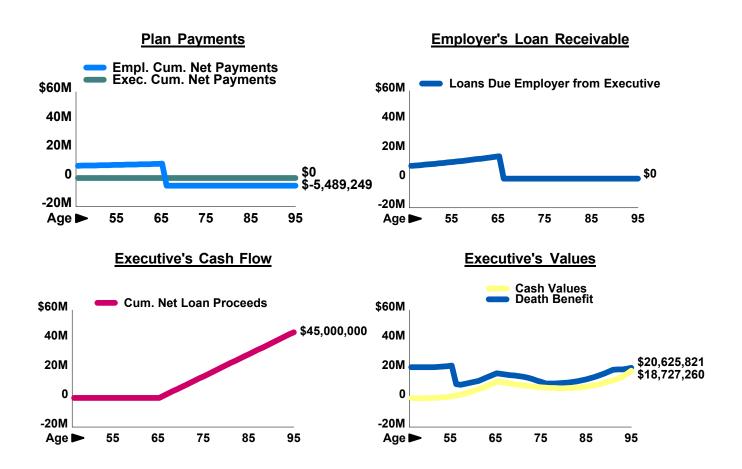
#### Living Benefits for the Executive

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.

If the loans have been repaid, the executive has free access to the cash values. The cash values can be accessed via: 1) policy loans or 2) policy withdrawals or 3) a combination of loans and withdrawals.

#### **Death Benefits for Beneficiaries**

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 wealth transfer taxes.



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Insured: Max Bracey (Executive Vice President)

Preface (continued)

Major Privately-Owned Business

#### **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 form of split dollar 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 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 this form of split dollar 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, if this applies to you, be certain to consult with your legal and tax advisers on these issues.

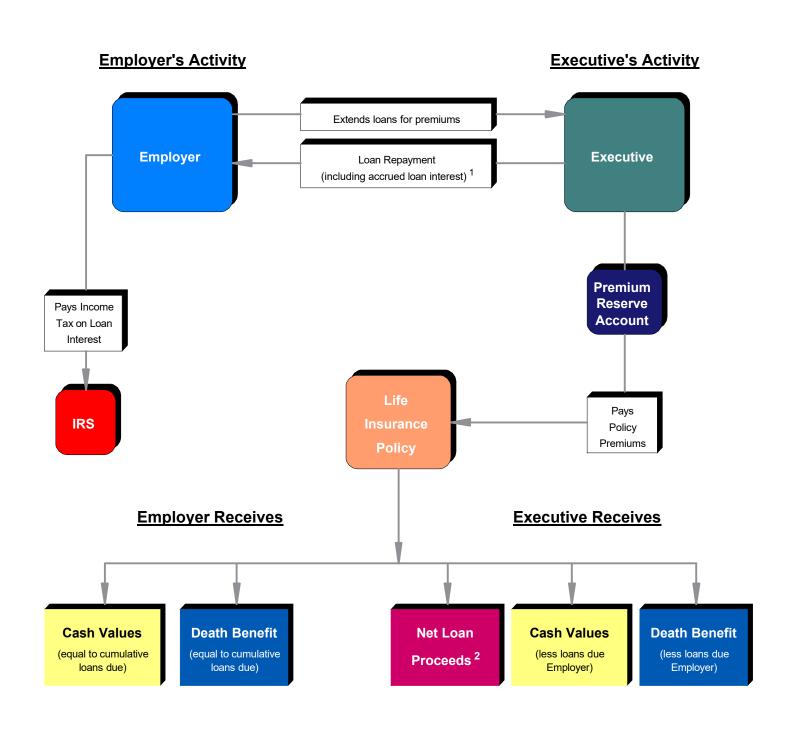
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Insured: Max Bracey (Executive Vice President)

Flow Chart

Major Privately-Owned Business



<sup>&</sup>lt;sup>1</sup> 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.

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<sup>&</sup>lt;sup>2</sup> For loan interest due the employer, loan repayment, and retirement income for the executive.

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Illustration of Policy Values Funding the Plan

Major Privately-Owned Business

Indexed UL Interest Rate 7.00% Initial Premium 1,000,000 Initial Policy Death Benefit 21,081,365

		(1)	(2)	(3)	(4)	(5)
		(-/	Net Policy	Year End	Year End	(5)
	Male	Policy	Loan	Accum	Cash	Death
Year	Age	Premium	Proceeds	Value*	Value*	Benefit
rear	Age	Premium	Proceeds	value	value	benefit
1	45	1,000,000	0	879,785	879,785	21,961,150
2	46	1,000,000	Ö	1,823,392	1,823,392	22,904,757
3	47	1,000,000	Ō	2,833,976	2,833,976	23,915,341
4	48	1,000,000	0	3,920,068	3,920,068	25,001,433
5	49	1,000,000	Ō	5,089,747	5,089,747	26,171,112
6	50	1,000,000	0	6,351,114	6,351,114	27,432,479
7	51	1,000,000	0	7,712,155	7,712,155	28,793,520
8	52	1,000,000	0	9,180,855	9,180,855	30,262,220
9	53	1,000,000	0	10,765,182	10,765,182	31,846,547
10	54	1,000,000	0	12,517,425	12,517,425	33,598,790
11	55	0	0	13,408,483	13,408,483	21,081,365
12	56	0	0	14,372,871	14,372,871	21,081,365
13	57	0	0	15,507,555	15,507,555	22,020,728
14	58	0	0	16,735,844	16,735,844	23,095,465
15	59	0	0	18,063,454	18,063,454	24,205,029
16	60	0	0	19,497,833	19,497,833	25,347,183
17	61	0	0	21,046,871	21,046,871	26,939,995
18	62	0	0	22,720,287	22,720,287	28,627,562
19	63	0	0	24,528,486	24,528,486	30,415,323
20	64	0	0	26,482,036	<b>26,482,036</b>	32,308,084
21	65	0	16,883,748	28,386,709	10,658,773	16,336,115
22	66	0	1,500,000	30,412,733	10,223,401	16,001,820
23	67	0	1,500,000	32,567,774	9,793,975	15,656,175
24	68	0	1,500,000	34,859,895	9,372,406	15,298,588
25	69	0	1,500,000	37,297,765	8,960,902	14,928,544
26	70	0	1,500,000	39,890,612	8,561,906	14,545,497
27	71	0	1,500,000	42,654,141	8,184,000	13,729,038
28	72	0	1,500,000	45,601,516	7,832,868	12,849,034
29	73	0	1,500,000	48,747,443	7,515,362	11,902,631
30	74	0	1,500,000	52,108,402	7,239,717	10,887,305

30,383,748

30 Year Summary

 Cum. Payments
 10,000,000

 Cum. Net Policy Loan Proceeds
 30,383,748

 Cash Value
 7,239,717

 Death Benefit
 10,887,305

\*This illustration assumes the nonguaranteed values shown 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.

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10,000,000

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Insured: Max Bracey (Executive Vice President)

Illustration of Policy Values Funding the Plan

Major Privately-Owned Business

Indexed UL Interest Rate 7.00% Initial Premium 1,000,000 Initial Policy Death Benefit 21,081,365

		(1)	(2)	(3)	(4)	(5)
			<b>Net Policy</b>	Year End	Year End	
	Male	Policy	Loan	Accum	Cash	Death
Year	Age	Premium	Proceeds	Value*	Value*	Benefit
31	75	0	1,500,000	55,703,065	7,015,945	9,801,099
32	76	0	1,500,000	59,533,217	6,836,741	9,813,402
33	77	0	1,500,000	63,614,115	6,707,816	9,888,522
34	78	0	1,500,000	67,961,803	6,635,189	10,033,279
35	79	0	1,500,000	72,593,337	6,625,392	10,255,059
36	80	0	1,500,000	77,526,381	6,685,039	10,561,358
37	81	0	1,500,000	82,777,942	6,819,532	10,958,430
38	82	0	1,500,000	88,366,955	7,035,626	11,453,973
39	83	0	1,500,000	94,312,854	7,339,958	12,055,601
40	84	0	1,500,000	100,634,614	7,738,073	12,769,803
41	85	0	1,500,000	107,344,408	8,228,040	13,595,260
42	86	0	1,500,000	114,460,205	8,813,018	14,536,029
43	87	0	1,500,000	121,996,638	9,492,093	15,591,925
44	88	0	1,500,000	129,961,503	10,256,730	16,754,805
45	89	0	1,500,000	138,362,632	11,097,620	18,015,752
46	90	0	1,500,000	147,202,184	11,998,922	19,359,031
47	91	0	1,500,000	156,660,965	13,122,540	19,388,979
48	92	0	1,500,000	166,833,631	14,543,285	19,548,294
49	93	0	1,500,000	177,845,737	16,365,873	19,922,788
50	94	0	1,500,000	189,856,117	18,727,260	20,625,821

10,000,000 60,383,748

50 Year Summary

 Cum. Payments
 10,000,000

 Cum. Net Policy Loan Proceeds
 60,383,748

 Cash Value
 18,727,260

 Death Benefit
 20,625,821

\*This illustration assumes the nonguaranteed values shown 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.

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Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

Premium Reserve Account (PRA) Analysis

Major Privately-Owned Business

PRA's Assumed Hypothetical Portfolio Net Yield 4.00%

			Funding o	f the Life Insura	nce Policy	
		(1)	(2)	(3)	(4)	(5)
		Executive's	Withdrawal			Year End
		Allocation	from the			Balance in
		to the	Premium	Account		Premium
		Premium	Reserve	Balance	Annualized	Reserve
	Male	Reserve	Account	After	Net Yield	Account*
Year	Age	Account	for Premium	Withdrawal	Assumed	(3) + (4)
						(5) - (1)
1	45	8,435,332	1,000,000	7,435,332	297,413	7,732,745
2	46	0	1,000,000	6,732,745	269,310	7,002,055
3	47	0	1,000,000	6,002,055	240,082	6,242,137
4	48	0	1,000,000	5,242,137	209,685	5,451,823
5	49	0	1,000,000	4,451,823	178,073	4,629,896
6	50	0	1,000,000	3,629,896	145,196	3,775,092
7	51	0	1,000,000	2,775,092	111,004	2,886,095
8	52	0	1,000,000	1,886,095	75,444	1,961,539
9	53	0	1,000,000	961,539	38,462	1,000,001
10	54	0	1.000.000	1	0	1

8,435,332 10,000,000 1,564,669

\*Column (5) is the source of the values in Column (5) on the page entitled Summary.

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Insured: Max Bracey (Executive Vice President)

## Summary

Major Privately-Owned Business

Employer's Tax Bracket 21.00% Executive's Tax Bracket 40.00% Indexed UL Interest Rate 7.00% Initial Policy Death Benefit 21,081,365 Assumed Long-Term AFR for All Years Illustrated 3.05%

Promissory Note Interest Rate 3.05% Years of Premium Reserve Account (PRA)

			Empl	oyer					Executive			
	Male	(1)	(2) Cumulative Net	(3) Amount Due as a Loan Receivable Including Accrued Loan	(4)  Cumulative  Charge to  Earnings**	(5)	(6) Year End Balance in the Premium Reserve Account	(7)  Net Policy  Loan  Proceeds  Available for  Retirement	(8) Year End Policy Accum	(9) Year End Policy Cash	(10) Year End PRA and Cash Value*** Net of Loan Due Employer	(11) Year End PRA and Policy Death Benefit Net of Loan Due
Yr	Age	Payment*	Payments	Interest	(2) - (3)	Payment*	(PRA)	Income	Value***	Value***	(9)+(6)-(3)	Employer
1 2 3 4 5 6 7 8 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70	8,489,360 55,676 57,374 59,124 60,928 62,786 64,701 66,674 68,708 70,803 72,963 75,188 77,481 79,845 82,280 84,789 87,375 90,040 92,787 95,617 -15,383,748 0 0 0 0	8,489,360 8,545,036 8,602,410 8,661,534 8,722,462 8,785,248 8,849,949 8,916,623 8,985,331 9,056,134 9,129,097 9,204,285 9,281,766 9,361,611 9,443,891 9,528,680 9,616,055 9,706,095 9,798,882 9,894,499 -5,489,249 -5,489,249 -5,489,249 -5,489,249 -5,489,249	8,692,610 8,957,735 9,230,946 9,512,490 9,802,621 10,101,601 10,409,700 10,727,196 11,054,375 11,391,533 11,738,975 12,097,014 12,465,973 12,846,185 13,237,994 13,641,753 14,057,826 14,486,590 14,928,431 15,383,748	-203,250 -412,699 -628,536 -850,956 -1,080,159 -1,316,353 -1,559,751 -1,810,573 -2,069,044 -2,335,399 -2,609,878 -2,892,729 -3,184,207 -3,484,574 -3,794,103 -4,113,073 -4,441,771 -4,780,495 -5,129,549 -5,489,249 -5,489,249 -5,489,249 -5,489,249 -5,489,249 -5,489,249 -5,489,249 -5,489,249 -5,489,249	000000000000000000000000000000000000000	7,732,745 7,002,055 6,242,137 5,451,823 4,629,896 3,775,092 2,886,095 1,961,539 1,000,001 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	879,785 1,823,392 2,833,976 3,920,068 5,089,747 6,351,114 7,712,155 9,180,855 10,765,182 12,517,425 13,408,483 14,372,871 15,507,555 16,735,844 18,063,454 19,497,833 21,046,871 22,720,287 24,528,486 26,482,036 28,386,709 30,412,733 32,567,774 34,859,895 37,297,765 39,890,612	879,785 1,823,392 2,833,976 3,920,068 5,089,747 6,351,114 7,712,155 9,180,855 10,765,182 12,517,425 13,408,483 14,372,871 15,507,555 16,735,844 18,063,454 19,497,833 21,046,871 22,720,287 24,528,486 26,482,036 10,658,773 10,223,401 9,793,975 9,372,406 8,960,902 8,561,906	-80,080 -132,288 -154,833 -140,599 -82,978 24,605 188,550 415,198 710,808 1,125,893  1,669,508 2,275,857 3,041,582 3,889,659 4,825,460 5,856,080 6,989,045 8,233,697 9,600,055 11,098,288  10,658,773 10,223,401 9,793,975 9,372,406 8,960,902 8,561,906	21,001,285 20,949,077 20,926,532 20,940,766 20,998,387 21,105,970 21,269,915 21,496,563 21,792,173 22,207,258 9,342,390 8,984,351 9,554,755 10,249,280 10,967,035 11,705,430 12,882,169 14,140,972 15,486,892 16,924,336 16,336,115 16,001,820 15,656,175 15,298,588 14,928,544 14,545,497
27 28 29 30	71 72 73 74	0 0 0 0 -5,489,249	-5,489,249 -5,489,249 -5,489,249 -5,489,249	0 0 0 0	-5,489,249 -5,489,249 -5,489,249 -5,489,249	0 0 0 0	0 0 0 0	1,500,000 1,500,000 1,500,000 1,500,000 15,000,000	42,654,141 45,601,516 48,747,443 52,108,402	8,184,000 7,832,868 7,515,362 7,239,717	8,184,000 7,832,868 7,515,362 7,239,717	13,729,038 12,849,034 11,902,631 10,887,305
		-5,405,245				U		15,000,000				

Executive's 30 Year Summary

†Cash value less employer's loans plus cum. net policy loans.

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<sup>\*</sup>See appropriate Net Payment Analysis for details.

<sup>\*\*</sup>A negative value indicates a credit to earnings.

<sup>\*\*\*</sup>This illustration assumes the nonguaranteed values shown 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.

Living Values † Death Benefit |
Indexed Universal Life: 7,239,717 10,887,305 |
Less Loan Repayment Due Employer: 0 0 0 |
Equals Executive's Net Value: 7,239,717 10,887,305 |
Plus Cumulative After Tax Cash Flow: 15,000,000 15,000,000 |
Equals Executive's Total Net Value: 22,239,717 25,887,305

Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

### Summary

Major Privately-Owned Business

Employer's Tax Bracket 21.00% Executive's Tax Bracket 40.00% Indexed UL Interest Rate 7.00% Initial Policy Death Benefit 21,081,365 Assumed Long-Term AFR for All Years Illustrated 3.05%

Promissory Note Interest Rate 3.05% Years of Premium Reserve Account (PRA)

			Emp	loyer					Executive			
		(1)	(2) Cumulative	(3) Amount Due as a Loan Receivable Including Accrued	(4) Cumulative Charge to	(5)	(6)  Year End Balance in the Premium Reserve	(7)  Net Policy  Loan  Proceeds  Available for	(8) Year End Policy	(9) Year End Policy	(10) Year End PRA and Cash Value*** Net of Loan Due	(11) Year End PRA and Policy Death Benefit Net of
	Male	Net	Net	Loan	Earnings**	Net	Account	Retirement	Accum	Cash	Employer	Loan Due
Yr —	Age	Payment*	Payments	Interest	(2) - (3)	Payment*	(PRA)	Income	Value***	Value***	(9)+(6)-(3)	Employer
31	75	0	-5,489,249	0	-5,489,249	0	0	1,500,000	55,703,065	7,015,945	7,015,945	9,801,099
32	76	0	-5,489,249	0	-5,489,249	0	0	1,500,000	59,533,217	6,836,741	6,836,741	9,813,402
33	77	0	-5,489,249	0	-5,489,249	0	0	1,500,000	63,614,115	6,707,816	6,707,816	9,888,522
34	78	0	-5,489,249	0	-5,489,249	0	0	1,500,000	67,961,803	6,635,189	6,635,189	10,033,279
35	79	0	-5,489,249	0	-5,489,249	0	0	1,500,000	72,593,337	6,625,392	6,625,392	10,255,059
36	80	0	-5,489,249	0	-5,489,249	0	0	1,500,000	77,526,381	6,685,039	6,685,039	10,561,358
37	81	0	-5,489,249	0	-5,489,249	0	0	1,500,000	82,777,942	6,819,532	6,819,532	10,958,430
38	82	0	-5,489,249	0	-5,489,249	0	0	1,500,000	88,366,955	7,035,626	7,035,626	11,453,973
39	83	0	-5,489,249	0	-5,489,249	0	0	1,500,000	94,312,854	7,339,958	7,339,958	12,055,601
40	84	0	-5,489,249	0	-5,489,249	0	0	1,500,000	100,634,614	7,738,073	7,738,073	12,769,803
41	85	0	-5,489,249	0	-5,489,249	0	0	1,500,000	107,344,408	8,228,040	8,228,040	13,595,260
42	86	0	-5,489,249	0	-5,489,249	0	0	1,500,000	114,460,205	8,813,018	8,813,018	14,536,029
43	87	0	-5,489,249	0	-5,489,249	0	0	1,500,000	121,996,638	9,492,093	9,492,093	15,591,925
44	88	0	-5,489,249	0	-5,489,249	0	0	1,500,000	129,961,503	10,256,730	10,256,730	16,754,805
45	89	0	-5,489,249	0	-5,489,249	0	0	1,500,000	138,362,632	11,097,620	11,097,620	18,015,752
46	90	0	-5,489,249	0	-5,489,249	0	0	1,500,000	147,202,184	11,998,922	11,998,922	19,359,031
47	91	0	-5,489,249	0	-5,489,249	0	0	1,500,000	156,660,965	13,122,540	13,122,540	19,388,979
48	92	0	-5,489,249	0	-5,489,249	0	0	1,500,000	166,833,631	14,543,285	14,543,285	19,548,294
49	93	0	-5,489,249	0	-5,489,249	0	0	1,500,000	177,845,737	16,365,873	16,365,873	19,922,788
50	94	0	-5,489,249	0	-5,489,249	0	0	1,500,000	189,856,117	18,727,260	18,727,260	20,625,821

-5,489,249 0 45,000,000

Executive's 50 Year Summary

†Cash value less employer's loans plus cum. net policy loans.

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<sup>\*</sup>See appropriate Net Payment Analysis for details.

<sup>\*\*</sup>A negative value indicates a credit to earnings.

<sup>\*\*\*</sup>This illustration assumes the nonguaranteed values shown 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.

Indexed Universal Life:
Less Loan Repayment Due Employer:
Plus Cumulative After Tax Cash Flow:
Equals Executive's Total Net Value:
Living Values †Death Benefit
18,727,260 20,625,821
18,727,260 20,625,821
45,000,000 45,000,000
63,727,260 65,625,821

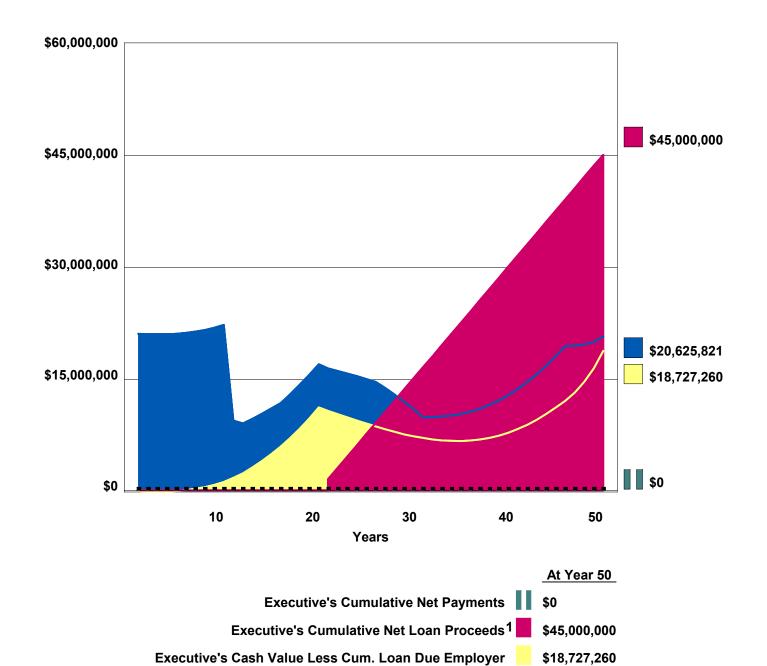
Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

\$20,625,821

Executive's 50 Year Analysis

Major Privately-Owned Business



Executive's Death Benefit Less Cum. Loan Due Employer

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<sup>&</sup>lt;sup>1</sup>For retirement income.

Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

**Executive's Net Payment Analysis** 

Major Privately-Owned Business

				executive's ax Bracket 40.00%	Assumed Long for All Years 3.05	Illustrated	Promissory I Interest Ra 3.05%			
Year	Male Age	Policy Premium Due by Executive	(2) Beginning of Year Loan from Employer for PRA	(3) Withdrawal from the Premium Reserve Account for Premium	(4) Net Policy Loan Proceeds Available for Loan Repayment	(5) Loan Repayment	(6)  Loan Interest Accrued	(7)  Cumulative Loan Due Employer	(8)  Payment  Due by  Executive (1)-(3)-(4)+(5)	(9) Net Policy Loan Proceeds Available for Retirement Income
1	45	1,000,000	8,435,332	1,000,000	0	0	257,278	8,692,610	0	0
2	46	1,000,000	0	1,000,000	0	0	265,125	8,957,735	0	0
3	47	1,000,000	0	1,000,000	0	0	273,211	9,230,946	0	0
4	48	1,000,000	0	1,000,000	Ō	Ō	281,544	9,512,490	Ō	0
5	49	1,000,000	0	1,000,000	0	0	290,131	9,802,621	0	0
6	50	1,000,000	0	1,000,000	0	Ō	298,980	10,101,601	0	0
7	51	1,000,000	0	1,000,000	Ō	Ō	308,099	10,409,700	Ō	0
8	52	1,000,000	0	1,000,000	0	0	317,496	10,727,196	0	0
9	53	1,000,000	Ō	1,000,000	Ō	Ö	327,179	11,054,375	Ō	Ō
10	54	1,000,000	Ō	1,000,000	Ō	Ō	337,158	11,391,533	Ō	Ō
				, ,			•	, ,		
11	55	0	0	0	0	0	347,442	11,738,975	0	0
12	56	0	0	0	0	0	358,039	12,097,014	0	0
13	57	0	0	0	0	0	368,959	12,465,973	0	0
14	58	0	0	0	0	0	380,212	12,846,185	0	0
15	59	0	0	0	0	0	391,809	13,237,994	0	0
16	60	0	0	0	0	0	403,759	13,641,753	0	0
17	61	0	0	0	0	0	416,073	14,057,826	0	0
18	62	0	0	0	0	0	428,764	14,486,590	0	0
19	63	0	0	0	0	0	441,841	14,928,431	0	0
20	64	0	0	0	0	0	455,317	15,383,748	0	0
21	65	0	0	0	15,383,748	15,383,748	0	0	0	1,500,000
22	66	0	0	0	0	0	0	0	0	1,500,000
23	67	0	0	0	0	0	0	0	0	1,500,000
24	68	0	0	0	0	0	0	0	0	1,500,000
25	69	0	0	0	0	0	0	0	0	1,500,000
26	70	0	0	0	0	0	0	0	0	1,500,000
27	71	0	0	0	0	0	0	0	0	1,500,000
28	72	0	0	0	0	0	0	0	0	1,500,000
29	73	0	0	0	0	0	0	0	0	1,500,000
30	74	0	0	0	0	0	0	0	0	1,500,000
		10,000,000	8,435,332	10,000,000	15,383,748	15,383,748	6,948,416		0	15,000,000

The promissory note between the employer and the executive is presumed to be secured by a collateral assignment of the policy.

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

Date: 06/01/2018 Page 11 of 16

<sup>\*</sup>See Preface for notes regarding loan interest rates.

Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

**Executive's Net Payment Analysis** 

Major Privately-Owned Business

			Ta	xecutive's ax Bracket 40.00%	Assumed Long for All Years 3.05	Illustrated	Promissory I Interest Ra 3.05%			
Year	Male Age	Policy Premium Due by Executive	Beginning of Year Loan from Employer for PRA	(3) Withdrawal from the Premium Reserve Account for Premium	(4) Net Policy Loan Proceeds Available for Loan Repayment	(5) Loan Repayment	(6)  Loan Interest Accrued	(7) Cumulative Loan Due Employer	(8)  Payment  Due by  Executive (1)-(3)-(4)+(5)	(9) Net Policy Loan Proceeds Available for Retirement Income
31	75	0	0	0	0	0	0	0	0	1,500,000
32	76	0	0	0	0	0	Ō	0	Ō	1,500,000
33	77	0	0	0	0	0	0	0	0	1,500,000
34	78	0	0	0	0	0	0	0	0	1,500,000
35	79	0	0	0	0	0	0	0	0	1,500,000
36	80	0	0	0	0	0	0	0	0	1,500,000
37 38	81	0	0	0	0	0	0	0	0	1,500,000
38 39	82 83	0	0 0	0	0	0	0 0	0	0 0	1,500,000 1,500,000
40	84	0	0	0	0	0	0	0	0	1,500,000
41	85	0	0	0	0	0	0	0	0	1,500,000
42	86	0	0	0	0	0	0	0	0	1,500,000
43	87	0	0	0	0	0	0	0	0	1,500,000
44	88	0	0	0	0	0	0	0	0	1,500,000
45	89	0	0	0	0	0	0	0	0	1,500,000
46	90	0	0 0	0 0	0	0 0	0 0	0	0 0	1,500,000
47 48	91 92	0	0	0	0	0	0	0	0	1,500,000 1,500,000
49	93	0	0	0	0	0	0	0	0	1,500,000
<del>5</del> 0	94	0	0	0	0	0	0	0	0	1,500,000
		10,000,000	8,435,332	10,000,000	15,383,748	15,383,748	6,948,416			45,000,000

The promissory note between the employer and the executive is presumed to be secured by a collateral assignment of the policy.

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

Date: 06/01/2018 Page 12 of 16

<sup>\*</sup>See Preface for notes regarding loan interest rates.

Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

## **Employer's Net Payment Analysis**

Major Privately-Owned Business

			Employer's Tax Bracket 21.00%		d Long-Term AF Years Illustrated 3.05%*	l Intere	ssory Note est Rate 05%		
		(1)	(2)	(3)	(4) Employer's Tax	(5) Cumulative Loan to	(6)	(7) Employer's	(8)
		Beginning	Loan		on	Executive	Employer's	Annual	Employer's
		of Year	Repayment	Accrued	Accrued	Including	Net	Charge to	Cumulative
	Male	Loan to	from	Loan	Loan	Loan	Payment	Earnings**	Charge to
Year	Age	Executive	Executive	Interest	Interest	Interest	(1) - (2)+ (4)	(4) - (3)	Earnings**
1	45	8,435,332	0	257,278	54,028	8,692,610	8,489,360	-203,250	-203,250
2	46	0,433,332	0	265,125	55,676	8,957,735	55,676	-209,449	-412,699
3	47	Ö	Ö	273,211	57,374	9,230,946	57,374	-215,837	-628,536
4	48	Ö	Ö	281,544	59,124	9,512,490	59,124	-222,420	-850,956
5	49	0	0	290,131	60,928	9,802,621	60,928	-229,203	-1,080,159
6	50	0	0	298,980	62,786	10,101,601	62,786	-236,194	-1,316,353
7	51	0	0	308,099	64,701	10,409,700	64,701	-243,398	-1,559,751
8	52	0	0	317,496	66,674	10,727,196	66,674	-250,822	-1,810,573
9	53	0	0	327,179	68,708	11,054,375	68,708	-258,471	-2,069,044
10	54	0	0	337,158	70,803	11,391,533	70,803	-266,355	-2,335,399
11	55	0	0	347,442	72,963	11,738,975	72,963	-274,479	-2,609,878
12	56	0	0	358,039	75,188	12,097,014	75,188	-282,851	-2,892,729
13	57	0	0	368,959	77,481	12,465,973	77,481	-291,478	-3,184,207
14	58	0	0	380,212	79,845	12,846,185	79,845	-300,367	-3,484,574
15	59	0	0	391,809	82,280	13,237,994	82,280	-309,529	-3,794,103
16	60	0	0	403,759	84,789	13,641,753	84,789	-318,970	-4,113,073
17	61	0	0	416,073	87,375	14,057,826	87,375	-328,698	-4,441,771
18	62	0	0	428,764	90,040	14,486,590	90,040	-338,724	-4,780,495
19	63	0	0	441,841	92,787	14,928,431	92,787	-349,054	-5,129,549
20	64	0	0	455,317	95,617	15,383,748	95,617	-359,700	-5,489,249
21	65	0	15,383,748	0	0	0	-15,383,748	0	-5,489,249
22	66	0	0	0	0	0	0	0	-5,489,249
23	67	0	0	0	0	0	0	0	-5,489,249
24	68	0	0	0	0	0	0	0	-5,489,249
25	69	0	0	0	0	0	0	0	-5,489,249
26	70	0	0	0	0	0	0	0	-5,489,249
27	71	0	0	0	0	0	0	0	-5,489,249
28	72	0	0	0	0	0	0	0	-5,489,249
29	73	0	0	0	0	0	0	0	-5,489,249
30	74	0	0	0	0	0	0	0	-5,489,249
		8,435,332	15,383,748	6,948,416	1,459,167		-5,489,249	-5,489,249	

The promissory note between the employer and the executive is presumed to be secured by a collateral assignment of the policy.

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

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<sup>\*</sup>See Preface for notes regarding loan interest rates.

<sup>\*\*</sup>A negative value indicates a credit to earnings.

Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

## **Employer's Net Payment Analysis**

Major Privately-Owned Business

Year	Male Age	Beginning of Year Loan to Executive	Loan Repayment from Executive	(3)  Accrued Loan Interest	(4) Employer's Tax on Accrued Loan Interest	(5) Cumulative Loan to Executive Including Loan Interest	(6) Employer's Net Payment (1) - (2)+ (4)	(7) Employer's Annual Charge to Earnings** (4) - (3)	(8) Employer's Cumulative Charge to Earnings**
31	75	0	0	0	0	0	0	0	-5,489,249
32	76	0	0	0	0	0	0	0	-5,489,249
33	77	0	0	0	0	0	0	0	-5,489,249
34 35	78 79	0	0	0	0 0	0	0 0	0	-5,489,249 -5,489,249
36	80	0	0	0	0	0	0	0	-5,489,249
37	81	0	0	Ō	Ō	0	Ō	Ō	-5,489,249
38	82	0	0	0	0	0	0	0	-5,489,249
39	83	0	0	0	0	0	0	0	-5,489,249
40	84	0	0	0	0	0	0	0	-5,489,249
41	85	0	0	0	0	0	0	0	-5,489,249
42	86	0	0	0	0	0	0	0	-5,489,249
43 44	87 88	0	0	0	0 0	0	0 0	0	-5,489,249 -5,489,249
44 45	89	0	0	0	0	0	0	0	-5,489,249
46	90	Ö	Ö	Ö	Ö	Ö	Ö	Ö	-5,489,249
47	91	0	0	0	0	0	0	0	-5,489,249
48	92	0	0	0	0	0	0	0	-5,489,249
49	93	0	0	0	0	0	0	0	-5,489,249
50	94	0	0	0	0	0	0	0	-5,489,249

The promissory note between the employer and the executive is presumed to be secured by a collateral assignment of the policy.

8,435,332

15,383,748

6,948,416

1,459,167

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

-5,489,249

-5,489,249

Date: 06/01/2018 Page 14 of 16

<sup>\*</sup>See Preface for notes regarding loan interest rates.

<sup>\*\*</sup>A negative value indicates a credit to earnings.

Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

## **Promissory Note Analysis**

Major Privately-Owned Business

Assumed Long-Term AFR for All Years Illustrated 3.05%\*\*

Promissory Note Interest Rate 3.05% Years of Premium Reserve Account (PRA) 10

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
							Year End	Year End	Year End	Year End	Year End
							Cum. Loan	Balance	PRA and	PRA and	PRA and
			Annual	Annual	Loan	Loan	to Executive	in the	Policy	Policy	Policy
		Beginning		Loan Interest	Repayments	Repayments	Including	Premium	Accum	Cash	Death
		of Year	Paid from	Paid from	from	from	Accrued	Reserve	Value*	Value*	Benefit*
					1	1 1			1 1 1		
	Male	Loan to	Non-Policy	Policy	Non-Policy	Policy	Loan	Account	Net of	Net of	Net of
Yr	Age	Executive	Values	Values	Values	Values	Interest	(PRA)	Loan	Loan	Loan
_	45	0.425.222	0	0			8,692,610	7,732,745	-80,080	-80,080	21,001,285
1 2	45 46	8,435,332	0	0	0	0	8,957,735	7,732,745 7,002,055	-80,080 -132,288	-80,080 -132,288	20,949,077
3	46 47	0	0	0	0	0	9,230,946	6,242,137	-152,200 -154,833	-152,266 -154,833	20,949,077
4	48	0	0	0	0	0	9,512,490	5,451,823	-140,599	-140,599	20,940,766
5	49	0	0	0	0	0	9,802,621	4,629,896	-82,978	-82,978	20,998,387
6	50	ő	0	0	Ö	ő	10,101,601	3,775,092	24,605	24,605	21,105,970
7	51	ő	Ö	Ö	ő	ŏ	10,409,700	2,886,095	188,550	188,550	21,269,915
8	52	Ō	0	Ö	Ō	Ō	10,727,196	1,961,539	415,198	415,198	21,496,563
9	53	Ō	Ö	Ö	Ö	Ō	11,054,375	1,000,001	710,808	710,808	21,792,173
10	54	0	0	0	0	0	11,391,533	1	1,125,893	1,125,893	22,207,258
11	55	0	0	0	0	0	11,738,975	0	1,669,508	1,669,508	9,342,390
12	56	0	0	0	0	0	12,097,014	0	2,275,857	2,275,857	8,984,351
13	57	0	0	0	0	0	12,465,973	0	3,041,582	3,041,582	9,554,755
14	58	0	0	0	0	0	12,846,185	0	3,889,659	3,889,659	10,249,280
15	59	0	0	0	0	0	13,237,994	0	4,825,460	4,825,460	10,967,035
16	60	0	0	0	0	0	13,641,753	0	5,856,080	5,856,080	11,705,430
17	61 62	0	0	0	0	0	14,057,826	0	6,989,045	6,989,045	12,882,169
18		-	-	-		0	14,486,590	0	8,233,697	8,233,697	14,140,972
19 20	63 64	0	0	0	0	0	14,928,431 15,383,748	0	9,600,055 11,098,288	9,600,055 11,098,288	15,486,892 16,924,336
20	04	U	U	U	U	U	15,363,746	U	11,090,200	11,090,200	10,924,336
21	65	0	0	0	0	15,383,748	0	0	28,386,709	10,658,773	16,336,115
22	66	0	0	0	0	0	0	0	30,412,733	10,223,401	16,001,820
23	67	0	0	0	0	0	0	0	32,567,774	9,793,975	15,656,175
24	68	0	0	0	0	0	0	0	34,859,895	9,372,406	15,298,588
25	69	0	0	0	0	0	0	0	37,297,765	8,960,902	14,928,544
26	70	0	0	0	0	0	0	0	39,890,612	8,561,906	14,545,497
27	71	0	0	0	0	0	0	0	42,654,141	8,184,000	13,729,038
28	72	0	0	0	0	0	0	0	45,601,516	7,832,868	12,849,034
29	73	0	0	0	0	0	0	0	48,747,443	7,515,362	11,902,631
30	74	0	0	0	0	0	0	0	52,108,402	7,239,717	10,887,305
		8,435,332	0	0	0	15,383,748					

\*This illustration assumes the nonguaranteed values shown 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 arrangement presumed terminated in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

Date: 06/01/2018 Page 15 of 16

<sup>\*\*</sup>See Preface for notes regarding loan interest rates.

Presented By: [Licensed User's Name Appears Here]

Insured: Max Bracey (Executive Vice President)

## **Promissory Note Analysis**

Major Privately-Owned Business

Assumed Long-Term AFR
for All Years Illustrated
3.05%**

Promissory Note Interest Rate 3.05% Years of Premium Reserve Account (PRA) 10

Yr —	Male Age	(1)  Beginning of Year Loan to Executive	Annual Loan Interest Paid from Non-Policy Values	(3)  Annual Loan Interest Paid from Policy Values	(4)  Loan Repayments from Non-Policy Values	(5)  Loan Repayments from Policy Values	(6) Year End Cum. Loan to Executive Including Accrued Loan Interest	(7) Year End Balance in the Premium Reserve Account (PRA)	(8) Year End PRA and Policy Accum Value* Net of Loan	(9) Year End PRA and Policy Cash Value* Net of Loan	(10) Year End PRA and Policy Death Benefit* Net of Loan
31	75	0	0	0	0	0	0	0	55,703,065	7,015,945	9,801,099
32	76	Ö	Ö	Ō	Ö	Ō	Ö	Ō	59,533,217	6,836,741	9,813,402
33	77	0	0	0	0	0	0	0	63,614,115	6,707,816	9,888,522
34	78	0	0	0	0	0	0	0	67,961,803	6,635,189	10,033,279
35	79	0	0	0	0	0	0	0	72,593,337	6,625,392	10,255,059
36	80	0	0	0	0	0	0	0	77,526,381	6,685,039	10,561,358
37	81	0	0	0	0	0	0	0	82,777,942	6,819,532	10,958,430
38	82	0	0	0	0	0	0	0	88,366,955	7,035,626	11,453,973
39	83	0	0	0	0	0	0	0	94,312,854	7,339,958	12,055,601
40	84	0	0	0	0	0	0	0	100,634,614	7,738,073	12,769,803
41	85	0	0	0	0	0	0	0	107,344,408	8,228,040	13,595,260
42	86	0	0	0	0	0	0	0	114,460,205	8,813,018	14,536,029
43	87	0	0	0	0	0	0	0	121,996,638	9,492,093	15,591,925
44	88	0	0	0	0	0	0	0	129,961,503	10,256,730	16,754,805
45	89	0	0	0	0	0	0	0	138,362,632	11,097,620	18,015,752
46	90	0	0	0	0	0	0	0	147,202,184	11,998,922	19,359,031
47	91	0	0	0	0	0	0	0	156,660,965	13,122,540	19,388,979
48	92	0	0	0	0	0	0	0	166,833,631	14,543,285	19,548,294
49	93	0	0	0	0	0	0	0	177,845,737	16,365,873	19,922,788
50	94	0	0	0	0	0	0	0	189,856,117	18,727,260	20,625,821

\*This illustration assumes the nonguaranteed values shown 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 arrangement presumed terminated in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

Date: 06/01/2018 Page 16 of 16

<sup>\*\*</sup>See Preface for notes regarding loan interest rates.