## Loan-Based Split Dollar by a C Corporation

For: Harry Stafford / Oliver Belmont


# Loan-Based Split Dollar by a C Corporation 

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Loan-Based Split Dollar by a C Corporation

## 1. Harry Stafford

## Preface

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.
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. As an additional benefit, the employer may choose to offset the executive's tax on any imputed loan interest by way of a bonus. ${ }^{1}$ Alternatively, loan interest may be accrued.
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 the executive is paying tax on imputed interest on the split dollar loan, a bonus ${ }^{1}$ can be paid from the employer to the executive to help pay this tax. Depending on the relative income tax brackets between the employer and the executive, this could be an attractive option and help reduce the impact of rising interest rates.
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 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 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 2020

Long-term loans (over 9 years): $1.01 \%$
Mid-term loans (over 3 years; not over 9): 0.43\%
Short-term loans (3 years or less): 0.18\%
Demand loans (blended annual rate): 2.42\%

[^0]Preface (continued)

## 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.

Plan Payments


Executive's Cash Flow


## 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.


## Preface (continued)

SB Chemical Company, Inc.

## 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.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

## Flow Chart



Note: 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.

[^1]
# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

| Indexed UL | Initial | Initial Policy |
| :---: | :---: | :---: |
| Interest Rate | Premium | Death Benefit |
| $6.50 \%$ | 400,000 | $9,500,000$ |


| Year | Male Age | (1) <br> Policy Premium | (2) <br> Net Policy Loan Proceeds | (3) <br> Year End Accum Value* | (4) <br> Year End Cash Value* | (5) <br> Death <br> Benefit |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 400,000 | 0 | 347,057 | 208,974 | 9,847,057 |
| 2 | 46 | 400,000 | 0 | 722,070 | 585,935 | 10,222,070 |
| 3 | 47 | 400,000 | 0 | 1,127,293 | 993,200 | 10,627,293 |
| 4 | 48 | 400,000 | 0 | 1,565,158 | 1 1,433,203 | 11,065,158 |
| 5 | 49 | 400,000 | 0 | 2,038,295 | 1,908,525 | 11,538,295 |
| 6 | 50 | 0 | 0 | 2,151,902 | 2,024,364 | 11,651,902 |
| 7 | 51 | 0 | 0 | 2,274,660 | 2,149,402 | 11,774,660 |
| 8 | 52 | 0 | 0 | 2,407,306 | 2,302,949 | 11,907,306 |
| 9 | 53 | 0 | 0 | 2,550,638 | 2,467,133 | 12,050,638 |
| 10 | 54 | 0 | 0 | 2,705,516 | 2,642,911 | 12,205,516 |
| 11 | 55 | 0 | 0 | 2,872,870 | 2,831,117 | 12,372,870 |
| 12 | 56 | 0 | 0 | 3,053,705 | 3,032,853 | 12,553,705 |
| 13 | 57 | 0 | 0 | 3,257,949 | 3,257,949 | 12,757,949 |
| 14 | 58 | 0 | 0 | 3,478,646 | 3,478,646 | 12,978,646 |
| 15 | 59 | 0 | 0 | 3,715,660 | 3,715,660 | 13,215,660 |
| 16 | 60 | 0 | 0 | 3,989,637 | 3,989,637 | 13,489,637 |
| 17 | 61 | 0 | 0 | 4,282,817 | 4,282,817 | 13,782,817 |
| 18 | 62 | 0 | 0 | 4,596,175 | 4,596,175 | 14,096,175 |
| 19 | 63 | 0 | 0 | 4,930,357 | 4,930,357 | 14,430,357 |
| 20 | 64 | 0 | 0 | 5,286,592 | 5,286,592 | 14,786,592 |
| 21 | 65 | 0 | 2,300,000 | 5,674,757 | 3,259,757 | 7,085,000 |
| 22 | 66 | 0 | 309,000 | 6,090,566 | 3,230,366 | 6,639,800 |
| 23 | 67 | 0 | 318,270 | 6,536,468 | 3,199,074 | 6,162,607 |
| 24 | 68 | 0 | 327,818 | 7,015,126 | 3,166,654 | 5,651,528 |
| 25 | 69 | 0 | 337,653 | 7,529,100 | 3,133,669 | 5,104,569 |
| 26 | 70 | 0 | 347,782 | 8,081,962 | 3,101,588 | 4,519,626 |
| 27 | 71 | 0 | 358,216 | 8,678,520 | 3,073,000 | 4,201,208 |
| 28 | 72 | 0 | 368,962 | 9,322,615 | 3,049,410 | 4,074,898 |
| 29 | 73 | 0 | 380,031 | 10,013,825 | 3,027,927 | 3,929,171 |
| 30 | 74 | 0 | 391,432 | 10,756,140 | 3,009,943 | 3,762,873 |
|  |  | 2,000,000 | 5,439,164 |  |  |  |

*This illustration assumes that the currently illustrated, non-guaranteed 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. Payments | $2,000,000$ |
| :--- | ---: |
| Cum. Net Policy Loan Proceeds | $5,439,164$ |
| Cash Value | $3,009,943$ |
| Death Benefit | $3,762,873$ |

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

| Indexed UL | Initial | Initial Policy |
| :---: | :---: | :---: |
| Interest Rate | Premium | Death Benefit |
| $6.50 \%$ | 400,000 | $9,500,000$ |


| Year | Male Age | (1) <br> Policy Premium | (2) <br> Net Policy Loan Proceeds | (3) <br> Year End Accum Value* | (4) <br> Year End Cash Value* | (5) <br> Death <br> Benefit |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | 403,175 | 11,554,046 | 2,997,206 | 3,574,908 |
| 32 | 76 | 0 | 415,270 | 12,408,488 | 2,987,772 | 3,608,196 |
| 33 | 77 | 0 | 427,728 | 13,323,314 | 2,982,448 | 3,648,613 |
| 34 | 78 | 0 | 440,560 | 14,302,591 | 2,982,093 | 3,697,223 |
| 35 | 79 | 0 | 453,777 | 15,350,648 | 2,987,659 | 3,755,192 |
| 36 | 80 | 0 | 467,390 | 16,471,964 | 3,000,066 | 3,823,664 |
| 37 | 81 | 0 | 481,412 | 17,671,015 | 3,020,040 | 3,903,591 |
| 38 | 82 | 0 | 495,854 | 18,952,706 | 3,048,536 | 3,996,171 |
| 39 | 83 | 0 | 510,730 | 20,322,120 | 3,086,474 | 4,102,580 |
| 40 | 84 | 0 | 526,052 | 21,783,503 | 3,133,720 | 4,222,895 |
| 41 | 85 | 0 | 541,833 | 23,340,311 | 3,189,115 | 4,356,131 |
| 42 | 86 | 0 | 558,088 | 24,997,721 | 3,252,972 | 4,502,858 |
| 43 | 87 | 0 | 574,831 | 26,759,779 | 3,324,220 | 4,662,209 |
| 44 | 88 | 0 | 592,076 | 28,628,991 | 3,399,975 | 4,831,424 |
| 45 | 89 | 0 | 609,838 | 30,607,872 | 3,477,074 | 5,007,468 |
| 46 | 90 | 0 | 628,133 | 32,697,629 | 3,550,751 | 5,185,632 |
| 47 | 91 | 0 | 646,977 | 34,940,869 | 3,657,321 | 5,054,956 |
| 48 | 92 | 0 | 666,387 | 37,360,623 | 3,813,192 | 4,934,010 |
| 49 | 93 | 0 | 686,378 | 39,987,363 | 4,041,863 | 4,841,611 |
| 50 | 94 | 0 | 706,970 | 42,859,671 | 4,374,577 | 4,803,174 |
| 51 | 95 | 0 | 728,179 | 46,023,890 | 4,849,954 | 4,849,954 |
| 52 | 96 | 0 | 750,024 | 49,423,076 | 5,402,919 | 5,402,919 |
| 53 | 97 | 0 | 772,525 | 53,074,997 | 6,042,680 | 6,042,680 |
| 54 | 98 | 0 | 795,701 | 56,998,786 | 6,779,368 | 6,779,368 |
| 55 | 99 | 0 | 819,572 | 61,215,052 | 7,624,113 | 7,624,113 |

$2,000,000 \quad 20,138,624$
*This illustration assumes that the currently illustrated, non-guaranteed 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. Payments | $2,000,000$ |
| :--- | ---: |
| Cum. Net Policy Loan Proceeds | $20,138,624$ |
| Cash Value | $7,624,113$ |
| Death Benefit | $7,624,113$ |

## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

Presented By: [Licensed user's name appears here]
Insured: Harry Stafford
Summary
Employer: SB Chemical Company, Inc.

| Employer's | Executive's |
| :---: | :---: |
| Tax Bracket | Tax Bracket |
| $28.00 \%$ | $40.00 \%$ |


| Indexed UL | Initial Policy |
| :---: | :---: |
| Interest Rate | Death Benefit |
| $6.50 \%$ | $9,500,000$ |

Assumed
Applicable
Federal Rate*


Executive's 30 Year Summary
*See Promissory Note Analysis for assumed Applicable Fed. Rate.
**See appropriate Net Payment Analysis for details.
***This illustration assumes that the currently illustrated, non-guaranteed 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.

|  | Living Values ${ }^{\dagger}$ Death Benefit |  |
| :--- | ---: | ---: |
|  | $3,009,943$ | $3,762,873$ |
| Indexed Universal Life: | 0 | 0 |
| Less Loan Repayment Due Employer: | $3,009,943$ | $3,762,873$ |
| Equals Executive's Net Value: | $3,439,164$ | $3,439,164$ |
| Plus Cumulative After Tax Cash Flow: | Equals Executive's Total Net Value: | $6,449,107$ |

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

## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

Presented By: [Licensed user's name appears here]
Insured: Harry Stafford

## Summary

Employer: SB Chemical Company, Inc.


0 18,138,624

Executive's 55 Year Summary
*See Promissory Note Analysis for assumed Applicable Fed. Rate.
**See appropriate Net Payment Analysis for details.
***This illustration assumes that the currently illustrated, non-guaranteed 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.

|  | Living ${ }^{2}{ }^{\dagger}$ Values ${ }^{\dagger}$ Death Benefit |  |
| :---: | ---: | ---: |
| $7,624,113$ | $7,624,113$ |  |
| er: | 0 | 0 |
|  | $7,624,113$ | $7,624,113$ |
| w: | $18,138,624$ | $18,138,624$ |
|  | $25,762,737$ | $25,762,737$ |

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

## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

Employer's 55 Year Analysis


|  | At Year 55 |
| ---: | :--- |
| Employer's Cumulative Net Payments | $\$ 254,476$ |
| Cumulative Charge to Earnings | $\$ 254,476$ |
| Loans Due Employer from Executive | $\$ 0$ |

## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

Executive's 55 Year Analysis


|  | At Year 55 |
| ---: | :--- |
| Executive's Cumulative Net Payments | $\$ 0$ |
| Executive's Cumulative Net Loan Proceeds ${ }^{1}$ | $\$ 18,138,624$ |
| Executive's Cash Value Less Cum. Loan Due Employer | $\$ 7,624,113$ |
| Executive's Death Benefit Less Cum. Loan Due Employer | $\$ 7,624,113$ |

[^2]
## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

Employer's Net Payment Analysis

| Employer's | Assumed |
| :---: | :---: |
| Tax Bracket | Applicable |
| $28.00 \%$ | Federal Rate* |


|  |  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Yr | Male <br> Age | Beginning of Year Loan to Executive | Loan Repayment from Executive | Cumulative <br> Loan to Executive | Employer's <br> Deemed Loan Interest Income | Employer's <br> Deemed Loan Interest Expense | Bonus <br> Paid to <br> Executive | After Tax <br> Cost of <br> Bonus <br> Paid to <br> Executive | Employer's Net Payment <br> (1)-(2)+(4) <br> $-(5)+(7)$ | Employer's Annual Charge to Earnings $(8)-(1)+(2)$ | Employer's <br> Cumulative <br> Charge to <br> Farnings |
| 1 | 45 | 400,000 | 0 | 400,000 | 4,040 | 4,040 | 2,693 | 1,939 | 401,939 | 1,939 | 1,939 |
| 2 | 46 | 400,000 | 0 | 800,000 | 9,040 | 9,040 | 6,027 | 4,339 | 404,339 | 4,339 | 6,278 |
| 3 | 47 | 400,000 | 0 | 1,200,000 | 15,000 | 15,000 | 10,000 | 7,200 | 407,200 | 7,200 | 13,478 |
| 4 | 48 | 400,000 | 0 | 1,600,000 | 22,080 | 22,080 | 14,720 | 10,598 | 410,598 | 10,598 | 24,076 |
| 5 | 49 | 400,000 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 414,400 | 14,400 | 38,476 |
| 6 | 50 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 52,876 |
| 7 | 51 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | -67,276 |
| 8 | 52 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 81,676 |
| 9 | 53 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 96,076 |
| 10 | 54 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 110,476 |
| 11 | 55 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | -124,876 |
| 12 | 56 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 139,276 |
| 13 | 57 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 153,676 |
| 14 | 58 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 168,076 |
| 15 | 59 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 182,476 |
| 16 | 60 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 196,876 |
| 17 | 61 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 211,276 |
| 18 | 62 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 225,676 |
| 19 | 63 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 240,076 |
| 20 | 64 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 254,476 |
| 21 | 65 | 0 | 2,000,000 | 0 | 0 | 0 | 0 | 0 | -2,000,000 | 0 | 254,476 |
| 22 | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 23 | 67 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 24 | 68 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 25 | 69 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 26 | 70 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 27 | 71 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 28 | 72 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 29 | 73 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 30 | 74 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
|  |  | 2,000,000 | 2,000,000 |  | 530,160 | 530,160 | 353,440 | 254,476 | 254,476 | 254,476 |  |

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

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.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

## Employer's Net Payment Analysis

| Employer's | Assumed |
| :---: | :---: |
| Tax Bracket | Applicable |
| $28.00 \%$ | Federal Rate* |


|  |  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Yr | $\begin{gathered} \text { Male } \\ \text { Age } \end{gathered}$ | Beginning of Year Loan to Executive | Loan Repayment from Executive | Cumulative Loan to Executive | Employer's <br> Deemed Loan Interest Income | Employer's <br> Deemed Loan Interest Expense | Bonus <br> Paid to Executive | After Tax <br> Cost of <br> Bonus <br> Paid to <br> Executive | Employer's <br> Net Payment <br> (1)-(2)+(4) <br> $-(5)+(7)$ | Employer's Annual Charge to Earnings $\text { (8) }-(1)+(2)$ | Employer's <br> Cumulative <br> Charge to Farnings |
| 31 | 75 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 32 | 76 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 33 | 77 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 34 | 78 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 35 | 79 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 36 | 80 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 37 | 81 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 38 | 82 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 39 | 83 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 40 | 84 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 41 | 85 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 42 | 86 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 43 | 87 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 44 | 88 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 45 | 89 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 46 | 90 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 47 | 91 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 48 | 92 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 49 | 93 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 50 | 94 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | , | 0 | 254,476 |
| 51 | 95 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 52 | 96 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 53 | 97 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 54 | 98 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 55 | 99 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |

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

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.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

| Executive's | Assumed <br> Applicable |
| :---: | :---: |
| Tax Bracket | and <br> Federal Rate |


| Yr | Male <br> Age | (1) <br> Policy Premium Due by Executive | (2) <br> Beginning of Year Loan from Employer | (3) <br> Net Policy Loan Proceeds Available for Loan Repayment |  |  | (6) <br> Executive's <br> Split Dollar <br> Imputed <br> Loan <br> Interest |  | (8) <br> After Tax Bonus Received from <br> Employer | (9) Executive's Net Payment $(1)-(2)-(3)$ $+(4)+(7)-(8)$ | (10) <br> Net Policy Loan Proceeds Available for Retirement Income |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 400,000 | 400,000 | 0 | 0 | 400,000 | 4,040 | 1,616 | 1,616 | 0 | 0 |
| 2 | 46 | 400,000 | 400,000 | 0 | 0 | 800,000 | 9,040 | 3,616 | 3,616 | 0 | 0 |
| 3 | 47 | 400,000 | 400,000 | 0 | 0 | 1,200,000 | 15,000 | 6,000 | 6,000 | 0 | 0 |
| 4 | 48 | 400,000 | 400,000 | 0 | 0 | 1,600,000 | 22,080 | 8,832 | 8,832 | 0 | 0 |
| 5 | 49 | 400,000 | 400,000 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 6 | 50 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 7 | 51 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 8 | 52 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 9 | 53 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 10 | 54 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 11 | 55 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 12 | 56 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 13 | 57 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 14 | 58 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 15 | 59 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 16 | 60 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 17 | 61 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 18 | 62 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 19 | 63 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 20 | 64 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 21 | 65 | 0 | 0 | 2,000,000 | 2,000,000 | 0 | 0 | 0 | 0 | 0 | 300,000 |
| 22 | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 309,000 |
| 23 | 67 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 318,270 |
| 24 | 68 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 327,818 |
| 25 | 69 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 337,653 |
| 26 | 70 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 347,782 |
| 27 | 71 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 358,216 |
| 28 | 72 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 368,962 |
| 29 | 73 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 380,031 |
| 30 | 74 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 391,432 |
|  |  | 2,000,000 | 2,000,000 | 2,000,000 | 2,000,000 |  | 530,160 | 212,064 | 212,064 | 0 | 3,439,164 |

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

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.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

| Executive's | Assumed |
| :---: | :---: |
| Tax Bracket | Applicable |
| $40.00 \%$ | Federal Rate* |


| Yr | Male Age | (1) <br> Policy Premium Due by Executive | (2) <br> Beginning of Year Loan from Employer | (3) <br> Net Policy Loan Proceeds Available for Loan Repayment | (4) <br> Loan Repayment | (5) <br> Cumulative Loan Due Employer | (6) <br> Executive's <br> Split Dollar <br> Imputed Loan Interest | (7) <br> Income Tax <br> on <br> Split Dollar <br> Imputed Loan Interest | (8) <br> After Tax <br> Bonus <br> Received from <br> Employer | (9) <br> Executive's <br> Net Payment $\begin{gathered} (1)-(2)-(3) \\ +(4)+(7)-(8) \end{gathered}$ | (10) <br> Net Policy Loan Proceeds Available for Retirement Income |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 403,175 |
| 32 | 76 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 415,270 |
| 33 | 77 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 427,728 |
| 34 | 78 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 440,560 |
| 35 | 79 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 453,777 |
| 36 | 80 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 467,390 |
| 37 | 81 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 481,412 |
| 38 | 82 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 495,854 |
| 39 | 83 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 510,730 |
| 40 | 84 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 526,052 |
| 41 | 85 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 541,833 |
| 42 | 86 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 558,088 |
| 43 | 87 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 574,831 |
| 44 | 88 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 592,076 |
| 45 | 89 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 609,838 |
| 46 | 90 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 628,133 |
| 47 | 91 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 646,977 |
| 48 | 92 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 666,387 |
| 49 | 93 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 686,378 |
| 50 | 94 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 706,970 |
| 51 | 95 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 728,179 |
| 52 | 96 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 750,024 |
| 53 | 97 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 772,525 |
| 54 | 98 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 795,701 |
| 55 | 99 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 819,572 |

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

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

Assumed Applicable<br>Federal Rate**<br>(See Col. 2)

| Yr | Male Age | (1) <br> Beginning of Year Loan to Executive | (2) <br> Assumed <br> Applicable <br> 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) Loan Repayments from Policy Values | (7) <br> Year End Cumulative Loan to Executive | (8) <br> Year End Policy Accum Value* Net of Loan | (9) <br> Year End Policy Cash Value* Net of Loan | (10) <br> Year End <br> Policy <br> Death <br> Benefit* <br> Net of <br> Loan |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 400,000 | 1.01\% | 0 | 0 | 0 | 0 | 400,000 | -52,943 | -191,026 | 9,447,057 |
| 2 | 46 | 400,000 | 1.13\% | 0 | 0 | 0 | 0 | 800,000 | -77,930 | -214,065 | 9,422,070 |
| 3 | 47 | 400,000 | 1.25\% | 0 | 0 | 0 | 0 | 1,200,000 | -72,707 | -206,800 | 9,427,293 |
| 4 | 48 | 400,000 | 1.38\% | 0 | 0 | 0 | 0 | 1,600,000 | -34,842 | -166,797 | 9,465,158 |
| 5 | 49 | 400,000 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 38,295 | -91,475 | 9,538,295 |
| 6 | 50 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 151,902 | 24,364 | 9,651,902 |
| 7 | 51 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 274,660 | 149,402 | 9,774,660 |
| 8 | 52 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 407,306 | 302,949 | 9,907,306 |
| 9 | 53 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 550,638 | 467,133 | 10,050,638 |
| 10 | 54 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 705,516 | 642,911 | 10,205,516 |
| 11 | 55 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 872,870 | 831,117 | 10,372,870 |
| 12 | 56 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,053,705 | 1,032,853 | 10,553,705 |
| 13 | 57 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,257,949 | 1,257,949 | 10,757,949 |
| 14 | 58 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,478,646 | 1,478,646 | 10,978,646 |
| 15 | 59 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,715,660 | 1,715,660 | 11,215,660 |
| 16 | 60 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,989,637 | 1,989,637 | 11,489,637 |
| 17 | 61 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 2,282,817 | 2,282,817 | 11,782,817 |
| 18 | 62 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 2,596,175 | 2,596,175 | 12,096,175 |
| 19 | 63 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 2,930,357 | 2,930,357 | 12,430,357 |
| 20 | 64 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 3,286,592 | 3,286,592 | 12,786,592 |
| 21 | 65 | 0 | n/a | 0 | 0 | 0 | 2,000,000 | 0 | 5,674,757 | 3,259,757 | 7,085,000 |
| 22 | 66 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 6,090,566 | 3,230,366 | 6,639,800 |
| 23 | 67 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 6,536,468 | 3,199,074 | 6,162,607 |
| 24 | 68 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 7,015,126 | 3,166,654 | 5,651,528 |
| 25 | 69 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 7,529,100 | 3,133,669 | 5,104,569 |
| 26 | 70 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 8,081,962 | 3,101,588 | 4,519,626 |
| 27 | 71 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 8,678,520 | 3,073,000 | 4,201,208 |
| 28 | 72 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 9,322,615 | 3,049,410 | 4,074,898 |
| 29 | 73 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 10,013,825 | 3,027,927 | 3,929,171 |
| 30 | 74 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 10,756,140 | 3,009,943 | 3,762,873 |
|  |  | 2,000,000 |  | 0 | 0 | 0 | 2,000,000 |  |  |  |  |

*This illustration assumes that the currently illustrated, non-guaranteed 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 arrangement presumed terminated in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

Assumed<br>Applicable<br>Federal Rate**<br>(See Col. 2)

| Yr | Male Age | (1) <br> Beginning of Year Loan to Executive | (2) <br> Assumed <br> 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 <br> Repayments from <br> Policy <br> Values | (7) <br> Year End Cumulative Loan to Executive | (8) <br> Year End <br> Policy <br> Accum <br> Value* <br> Net of Loan | (9) <br> Year End <br> Policy <br> Cash <br> Value* <br> Net of Loan | (10) <br> Year End <br> Policy <br> Death <br> Benefit* <br> Net of Loan |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 11,554,046 | 2,997,206 | 3,574,908 |
| 32 | 76 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 12,408,488 | 2,987,772 | 3,608,196 |
| 33 | 77 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 13,323,314 | 2,982,448 | 3,648,613 |
| 34 | 78 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 14,302,591 | 2,982,093 | 3,697,223 |
| 35 | 79 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 15,350,648 | 2,987,659 | 3,755,192 |
| 36 | 80 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 16,471,964 | 3,000,066 | 3,823,664 |
| 37 | 81 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 17,671,015 | 3,020,040 | 3,903,591 |
| 38 | 82 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 18,952,706 | 3,048,536 | 3,996,171 |
| 39 | 83 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 20,322,120 | 3,086,474 | 4,102,580 |
| 40 | 84 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 21,783,503 | 3,133,720 | 4,222,895 |
| 41 | 85 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 23,340,311 | 3,189,115 | 4,356,131 |
| 42 | 86 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 24,997,721 | 3,252,972 | 4,502,858 |
| 43 | 87 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 26,759,779 | 3,324,220 | 4,662,209 |
| 44 | 88 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 28,628,991 | 3,399,975 | 4,831,424 |
| 45 | 89 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 30,607,872 | 3,477,074 | 5,007,468 |
| 46 | 90 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 32,697,629 | 3,550,751 | 5,185,632 |
| 47 | 91 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 34,940,869 | 3,657,321 | 5,054,956 |
| 48 | 92 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 37,360,623 | 3,813,192 | 4,934,010 |
| 49 | 93 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 39,987,363 | 4,041,863 | 4,841,611 |
| 50 | 94 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 42,859,671 | 4,374,577 | 4,803,174 |
| 51 | 95 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 46,023,890 | 4,849,954 | 4,849,954 |
| 52 | 96 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 49,423,076 | 5,402,919 | 5,402,919 |
| 53 | 97 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 53,074,997 | 6,042,680 | 6,042,680 |
| 54 | 98 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 56,998,786 | 6,779,368 | 6,779,368 |
| 55 | 99 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 61,215,052 | 7,624,113 | 7,624,113 |

*This illustration assumes that the currently illustrated, non-guaranteed 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 arrangement presumed terminated in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

Loan-Based Split Dollar by a C Corporation

## 2. Oliver Belmont

## Preface

SB Chemical Company, Inc.

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.
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. As an additional benefit, the employer may choose to offset the executive's tax on any imputed loan interest by way of a bonus. ${ }^{1}$ Alternatively, loan interest may be accrued.
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 the executive is paying tax on imputed interest on the split dollar loan, a bonus ${ }^{1}$ can be paid from the employer to the executive to help pay this tax. Depending on the relative income tax brackets between the employer and the executive, this could be an attractive option and help reduce the impact of rising interest rates.
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 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 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 2020

Long-term loans (over 9 years): $1.01 \%$
Mid-term loans (over 3 years; not over 9): 0.43\%
Short-term loans (3 years or less): 0.18\%
Demand loans (blended annual rate): 2.42\%

[^3]Preface (continued)

## 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.

Plan Payments


Executive's Cash Flow


SB Chemical Company, Inc.

## 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.


## 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.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

## Flow Chart



Note: 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.

[^4]
# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

## Illustration of Policy Values Funding the Plan

| Indexed UL | Initial | Initial Policy |
| :---: | :---: | :---: |
| Interest Rate | Premium | Death Benefit |
| $6.50 \%$ | 400,000 | $9,500,000$ |


| Year | Male Age | (1) <br> Policy Premium | (2) <br> Net Policy Loan Proceeds | (3) <br> Year End Accum Value* | (4) <br> Year End Cash Value* | (5) <br> Death <br> Benefit |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 400,000 | 0 | 347,057 | 208,974 | 9,847,057 |
| 2 | 46 | 400,000 | 0 | 722,070 | 585,935 | 10,222,070 |
| 3 | 47 | 400,000 | 0 | 1,127,293 | 993,200 | 10,627,293 |
| 4 | 48 | 400,000 | 0 | 1,565,158 | 1 1,433,203 | 11,065,158 |
| 5 | 49 | 400,000 | 0 | 2,038,295 | -1,908,525 | 11,538,295 |
| 6 | 50 | 0 | 0 | 2,151,902 | $\square \mathbf{2 , 0 2 4 , 3 6 4}$ | 11,651,902 |
| 7 | 51 | 0 | 0 | 2,274,660 | $\square \mathbf{2 , 1 4 9 , 4 0 2}$ | 11,774,660 |
| 8 | 52 | 0 | 0 | 2,407,306 | 2,302,949 | 11,907,306 |
| 9 | 53 | 0 | 0 | 2,550,638 | 2,467,133 | 12,050,638 |
| 10 | 54 | 0 | 0 | 2,705,516 | 2,642,911 | 12,205,516 |
| 11 | 55 | 0 | 0 | 2,872,870 | 2,831,117 | 12,372,870 |
| 12 | 56 | 0 | 0 | 3,053,705 | 3,032,853 | 12,553,705 |
| 13 | 57 | 0 | 0 | 3,257,949 | 3,257,949 | 12,757,949 |
| 14 | 58 | 0 | 0 | 3,478,646 | 3,478,646 | 12,978,646 |
| 15 | 59 | 0 | 0 | 3,715,660 | 3,715,660 | 13,215,660 |
| 16 | 60 | 0 | 0 | 3,989,637 | 3,989,637 | 13,489,637 |
| 17 | 61 | 0 | 0 | 4,282,817 | 4,282,817 | 13,782,817 |
| 18 | 62 | 0 | 0 | 4,596,175 | 4,596,175 | 14,096,175 |
| 19 | 63 | 0 | 0 | 4,930,357 | 4,930,357 | 14,430,357 |
| 20 | 64 | 0 | 0 | 5,286,592 | 5,286,592 | 14,786,592 |
| 21 | 65 | 0 | 2,300,000 | 5,674,757 | 3,259,757 | 7,085,000 |
| 22 | 66 | 0 | 309,000 | 6,090,566 | 3,230,366 | 6,639,800 |
| 23 | 67 | 0 | 318,270 | 6,536,468 | 3,199,074 | 6,162,607 |
| 24 | 68 | 0 | 327,818 | 7,015,126 | 3,166,654 | 5,651,528 |
| 25 | 69 | 0 | 337,653 | 7,529,100 | 3,133,669 | 5,104,569 |
| 26 | 70 | 0 | 347,782 | 8,081,962 | 3,101,588 | 4,519,626 |
| 27 | 71 | 0 | 358,216 | 8,678,520 | 3,073,000 | 4,201,208 |
| 28 | 72 | 0 | 368,962 | 9,322,615 | 3,049,410 | 4,074,898 |
| 29 | 73 | 0 | 380,031 | 10,013,825 | 3,027,927 | 3,929,171 |
| 30 | 74 | 0 | 391,432 | 10,756,140 | 3,009,943 | 3,762,873 |
|  |  | 2,000,000 | 5,439,164 |  |  |  |

*This illustration assumes that the currently illustrated, non-guaranteed 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. Payments | $2,000,000$ |
| :--- | :--- |
| Cum. Net Policy Loan Proceeds | $5,439,164$ |
| Cash Value | $3,009,943$ |
| Death Benefit | $3,762,873$ |

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

## Illustration of Policy Values Funding the Plan

| Indexed UL | Initial | Initial Policy |
| :---: | :---: | :---: |
| Interest Rate | Premium | Death Benefit |
| $6.50 \%$ | 400,000 | $9,500,000$ |


| Year | Male Age | (1) <br> Policy Premium | (2) <br> Net Policy Loan Proceeds | (3) <br> Year End Accum Value* | (4) <br> Year End Cash Value* | (5) <br> Death <br> Benefit |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | 403,175 | 11,554,046 | 2,997,206 | 3,574,908 |
| 32 | 76 | 0 | 415,270 | 12,408,488 | 2,987,772 | 3,608,196 |
| 33 | 77 | 0 | 427,728 | 13,323,314 | 2,982,448 | 3,648,613 |
| 34 | 78 | 0 | 440,560 | 14,302,591 | 2,982,093 | 3,697,223 |
| 35 | 79 | 0 | 453,777 | 15,350,648 | 2,987,659 | 3,755,192 |
| 36 | 80 | 0 | 467,390 | 16,471,964 | 3,000,066 | 3,823,664 |
| 37 | 81 | 0 | 481,412 | 17,671,015 | 3,020,040 | 3,903,591 |
| 38 | 82 | 0 | 495,854 | 18,952,706 | 3,048,536 | 3,996,171 |
| 39 | 83 | 0 | 510,730 | 20,322,120 | 3,086,474 | 4,102,580 |
| 40 | 84 | 0 | 526,052 | 21,783,503 | 3,133,720 | 4,222,895 |
| 41 | 85 | 0 | 541,833 | 23,340,311 | 3,189,115 | 4,356,131 |
| 42 | 86 | 0 | 558,088 | 24,997,721 | 3,252,972 | 4,502,858 |
| 43 | 87 | 0 | 574,831 | 26,759,779 | 3,324,220 | 4,662,209 |
| 44 | 88 | 0 | 592,076 | 28,628,991 | 3,399,975 | 4,831,424 |
| 45 | 89 | 0 | 609,838 | 30,607,872 | 3,477,074 | 5,007,468 |
| 46 | 90 | 0 | 628,133 | 32,697,629 | 3,550,751 | 5,185,632 |
| 47 | 91 | 0 | 646,977 | 34,940,869 | 3,657,321 | 5,054,956 |
| 48 | 92 | 0 | 666,387 | 37,360,623 | 3,813,192 | 4,934,010 |
| 49 | 93 | 0 | 686,378 | 39,987,363 | 4,041,863 | 4,841,611 |
| 50 | 94 | 0 | 706,970 | 42,859,671 | 4,374,577 | 4,803,174 |
| 51 | 95 | 0 | 728,179 | 46,023,890 | 4,849,954 | 4,849,954 |
| 52 | 96 | 0 | 750,024 | 49,423,076 | 5,402,919 | 5,402,919 |
| 53 | 97 | 0 | 772,525 | 53,074,997 | 6,042,680 | 6,042,680 |
| 54 | 98 | 0 | 795,701 | 56,998,786 | 6,779,368 | 6,779,368 |
| 55 | 99 | 0 | 819,572 | 61,215,052 | 7,624,113 | 7,624,113 |

$$
2,000,000 \quad 20,138,624
$$

*This illustration assumes that the currently illustrated, non-guaranteed 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. Payments | $2,000,000$ |
| :--- | ---: |
| Cum. Net Policy Loan Proceeds | $20,138,624$ |
| Cash Value | $7,624,113$ |
| Death Benefit | $7,624,113$ |

## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

| Employer's | Executive's |
| :---: | :---: |
| Tax Bracket | Tax Bracket |
| $28.00 \%$ | $40.00 \%$ | 28.00\% 40.00\%

$$
\begin{gathered}
\text { Indexed UL } \\
\text { Interest Rate } \\
6.50 \%
\end{gathered}
$$

Initial Policy
Death Benefit
$9,500,000$ Death Benefit 9,500,000

Assumed
Applicable
Federal Rate*

| Executive |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| (5) <br> Net Payment** | (6) <br> Net Policy Loan Proceeds* Available for Retirement Income | Year End Policy Accum Value*** | (8) <br> Year End Policy Cash Value*** |  | (10) Year End Policy Death Benefit Net of Loan Due Employer |
| 0 | 0 | 347,057 | 208,974 | -191,026 | 9,447,057 |
| 0 | 0 | 722,070 | 585,935 | -214,065 | 9,422,070 |
| 0 | 0 | 1,127,293 | 993,200 | -206,800 | 9,427,293 |
| 0 | 0 | 1,565,158 | 1,433,203 | -166,797 | 9,465,158 |
| 0 | 0 | 2,038,295 | 1,908,525 | -91,475 | 9,538,295 |
| 0 | 0 | 2,151,902 | 2,024,364 | 24,364 | 9,651,902 |
| 0 | 0 | 2,274,660 | 2,149,402 | 149,402 | 9,774,660 |
| 0 | 0 | 2,407,306 | 2,302,949 | 302,949 | 9,907,306 |
| 0 | 0 | 2,550,638 | 2,467,133 | 467,133 | 10,050,638 |
| 0 | 0 | 2,705,516 | 2,642,911 | 642,911 | 10,205,516 |
| 0 | 0 | 2,872,870 | 2,831,117 | 831,117 | 10,372,870 |
| 0 | 0 | 3,053,705 | 3,032,853 | 1,032,853 | 10,553,705 |
| 0 | 0 | 3,257,949 | 3,257,949 | 1,257,949 | 10,757,949 |
| 0 | 0 | 3,478,646 | 3,478,646 | 1,478,646 | 10,978,646 |
| 0 | 0 | 3,715,660 | 3,715,660 | 1,715,660 | 11,215,660 |
| 0 | 0 | 3,989,637 | 3,989,637 | 1,989,637 | 11,489,637 |
| 0 | 0 | 4,282,817 | 4,282,817 | 2,282,817 | 11,782,817 |
| 0 | 0 | 4,596,175 | 4,596,175 | 2,596,175 | 12,096,175 |
| 0 | 0 | 4,930,357 | 4,930,357 | 2,930,357 | 12,430,357 |
| 0 | 0 | 5,286,592 | 5,286,592 | 3,286,592 | 12,786,592 |
| 0 | 300,000 | 5,674,757 | 3,259,757 | 3,259,757 | 7,085,000 |
| 0 | 309,000 | 6,090,566 | 3,230,366 | 3,230,366 | 6,639,800 |
| 0 | 318,270 | 6,536,468 | 3,199,074 | 3,199,074 | 6,162,607 |
| 0 | 327,818 | 7,015,126 | 3,166,654 | 3,166,654 | 5,651,528 |
| 0 | 337,653 | 7,529,100 | 3,133,669 | 3,133,669 | 5,104,569 |
| 0 | 347,782 | 8,081,962 | 3,101,588 | 3,101,588 | 4,519,626 |
| 0 | 358,216 | 8,678,520 | 3,073,000 | 3,073,000 | 4,201,208 |
| 0 | 368,962 | 9,322,615 | 3,049,410 | 3,049,410 | 4,074,898 |
| 0 | 380,031 | 10,013,825 | 3,027,927 | 3,027,927 | 3,929,171 |
| 0 | 391,432 | 10,756,140 | 3,009,943 | 3,009,943 | 3,762,873 |
|  | 3,439 |  |  |  |  |

Executive's 30 Year Summary

|  | Living Values ${ }^{\dagger}$ Death Benefit |  |
| :--- | ---: | ---: |
|  | $3,009,943$ | $3,762,873$ |
| Indexed Universal Life: | 0 | 0 |
| Less Loan Repayment Due Employer: | $3,009,943$ | $3,762,873$ |
| Equals Executive's Net Value: | $3,439,164$ | $3,439,164$ |
| Plus Cumulative After Tax Cash Flow: | $\mathbf{6 , 4 4 9 , 1 0 7}$ | $\mathbf{7 , 2 0 2 , 0 3 7}$ |

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

## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

Presented By: [Licensed user's name appears here]
Insured: Oliver Belmont
Summary
Employer: SB Chemical Company, Inc.


0 18,138,624

Executive's 55 Year Summary
***This illustration assumes that the currently illustrated, non-guaranteed 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.

## Living Values ${ }^{\dagger}$ Death Benefit <br> 7,624,113 7,624,113 <br> 7,624,113 7,624,113 <br> 18,138,624 18,138,624 <br> $25,762,737 \quad 25,762,737$

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

## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

Employer's 55 Year Analysis


|  | At Year 55 |
| ---: | :--- |
| Employer's Cumulative Net Payments | $\$ 254,476$ |
| Cumulative Charge to Earnings | $\$ 254,476$ |
| Loans Due Employer from Executive | $\$ 0$ |

## Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life

Executive's 55 Year Analysis


|  | At Year 55 |
| ---: | :--- |
| Executive's Cumulative Net Payments | $\$ 0$ |
| Executive's Cumulative Net Loan Proceeds ${ }^{1}$ | $\$ 18,138,624$ |
| Executive's Cash Value Less Cum. Loan Due Employer | $\$ 7,624,113$ |
| Executive's Death Benefit Less Cum. Loan Due Employer | $\$ 7,624,113$ |

[^5]
# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

Employer's Net Payment Analysis

| Employer's | Assumed |
| :---: | :---: |
| Tax Bracket | Applicable |
| $28.00 \%$ | Federal Rate* |


|  |  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Yr | Male <br> Age | Beginning of Year Loan to Executive | Loan Repayment from Executive | Cumulative <br> Loan to Executive | Employer's <br> Deemed Loan Interest Income | Employer's <br> Deemed Loan Interest Expense | Bonus <br> Paid to <br> Executive | After Tax <br> Cost of <br> Bonus <br> Paid to <br> Executive | Employer's Net Payment <br> (1)-(2)+(4) <br> $-(5)+(7)$ | Employer's Annual Charge to Earnings $(8)-(1)+(2)$ | Employer's <br> Cumulative <br> Charge to <br> Farnings |
| 1 | 45 | 400,000 | 0 | 400,000 | 4,040 | 4,040 | 2,693 | 1,939 | 401,939 | 1,939 | 1,939 |
| 2 | 46 | 400,000 | 0 | 800,000 | 9,040 | 9,040 | 6,027 | 4,339 | 404,339 | 4,339 | 6,278 |
| 3 | 47 | 400,000 | 0 | 1,200,000 | 15,000 | 15,000 | 10,000 | 7,200 | 407,200 | 7,200 | 13,478 |
| 4 | 48 | 400,000 | 0 | 1,600,000 | 22,080 | 22,080 | 14,720 | 10,598 | 410,598 | 10,598 | 24,076 |
| 5 | 49 | 400,000 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 414,400 | 14,400 | 38,476 |
| 6 | 50 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 52,876 |
| 7 | 51 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | -67,276 |
| 8 | 52 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 81,676 |
| 9 | 53 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 96,076 |
| 10 | 54 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 110,476 |
| 11 | 55 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | -124,876 |
| 12 | 56 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 139,276 |
| 13 | 57 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 153,676 |
| 14 | 58 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 168,076 |
| 15 | 59 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 182,476 |
| 16 | 60 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 196,876 |
| 17 | 61 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 211,276 |
| 18 | 62 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | - 225,676 |
| 19 | 63 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 240,076 |
| 20 | 64 | 0 | 0 | 2,000,000 | 30,000 | 30,000 | 20,000 | 14,400 | 14,400 | 14,400 | 254,476 |
| 21 | 65 | 0 | 2,000,000 | 0 | 0 | 0 | 0 | 0 | -2,000,000 | 0 | 254,476 |
| 22 | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 23 | 67 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 24 | 68 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 25 | 69 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 26 | 70 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 27 | 71 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 28 | 72 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 29 | 73 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 30 | 74 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
|  |  | 2,000,000 | 2,000,000 |  | 530,160 | 530,160 | 353,440 | 254,476 | 254,476 | 254,476 |  |

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

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.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

## Employer's Net Payment Analysis

| Employer's | Assumed |
| :---: | :---: |
| Tax Bracket | Applicable |
| $28.00 \%$ | Federal Rate* |


|  |  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Yr | $\begin{gathered} \text { Male } \\ \text { Age } \end{gathered}$ | Beginning of Year Loan to Executive | Loan Repayment from Executive | Cumulative Loan to Executive | Employer's <br> Deemed Loan Interest Income | Employer's <br> Deemed Loan Interest Expense | Bonus <br> Paid to Executive | After Tax <br> Cost of <br> Bonus <br> Paid to <br> Executive | Employer's <br> Net Payment <br> (1)-(2)+(4) <br> $-(5)+(7)$ | Employer's Annual Charge to Earnings $\text { (8) }-(1)+(2)$ | Employer's <br> Cumulative <br> Charge to Farnings |
| 31 | 75 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 32 | 76 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 33 | 77 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 34 | 78 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 35 | 79 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 36 | 80 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 37 | 81 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 38 | 82 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 39 | 83 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 40 | 84 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 41 | 85 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 42 | 86 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 43 | 87 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 44 | 88 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 45 | 89 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 46 | 90 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 47 | 91 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 48 | 92 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 49 | 93 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 50 | 94 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | , | 0 | 254,476 |
| 51 | 95 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 52 | 96 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 53 | 97 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 54 | 98 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |
| 55 | 99 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 254,476 |

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

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.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

## Executive's Net Payment Analysis

| Executive's | Assumed <br> Applicable |
| :---: | :---: |
| Tax Bracket | A. <br> Federal Rate* |


| Yr | Male <br> Age | (1) <br> Policy Premium Due by Executive | (2) <br> Beginning of Year Loan from Employer | (3) <br> Net Policy Loan Proceeds Available for Loan Repayment | (4) <br> Loan Repayment | (5) <br> Cumulative <br> Loan Due <br> Employer | (6) <br> Executive's <br> Split Dollar <br> Imputed <br> Loan <br> Interest |  | (8) <br> After Tax <br> Bonus <br> Received from <br> Employer | (9) Executive's Net Payment (1)-(2)-(3) $+(4)+(7)-(8)$ | (10) <br> Net Policy Loan Proceeds Available for Retirement Income |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 400,000 | 400,000 | 0 | 0 | 400,000 | 4,040 | 1,616 | 1,616 | 0 | 0 |
| 2 | 46 | 400,000 | 400,000 | 0 | 0 | 800,000 | 9,040 | 3,616 | 3,616 | 0 | 0 |
| 3 | 47 | 400,000 | 400,000 | 0 | 0 | 1,200,000 | 15,000 | 6,000 | 6,000 | 0 | 0 |
| 4 | 48 | 400,000 | 400,000 | 0 | 0 | 1,600,000 | 22,080 | 8,832 | 8,832 | 0 | 0 |
| 5 | 49 | 400,000 | 400,000 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 6 | 50 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 7 | 51 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 8 | 52 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 9 | 53 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 10 | 54 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 11 | 55 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 12 | 56 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 13 | 57 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 14 | 58 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 15 | 59 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 16 | 60 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 17 | 61 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 18 | 62 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 19 | 63 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 20 | 64 | 0 | 0 | 0 | 0 | 2,000,000 | 30,000 | 12,000 | 12,000 | 0 | 0 |
| 21 | 65 | 0 | 0 | 2,000,000 | 2,000,000 | 0 | 0 | 0 | 0 | 0 | 300,000 |
| 22 | 66 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 309,000 |
| 23 | 67 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 318,270 |
| 24 | 68 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 327,818 |
| 25 | 69 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 337,653 |
| 26 | 70 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 347,782 |
| 27 | 71 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 358,216 |
| 28 | 72 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 368,962 |
| 29 | 73 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 380,031 |
| 30 | 74 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 391,432 |
|  |  | 2,000,000 | 2,000,000 | 2,000,000 | 2,000,000 |  | 530,160 | 212,064 | 212,064 | 0 | 3,439,164 |

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

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.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

| Executive's | Assumed |
| :---: | :---: |
| Tax Bracket | Applicable |
| $40.00 \%$ | Federal Rate |


| Yr | Male Age | (1) <br> Policy Premium Due by Executive | (2) <br> Beginning of Year Loan from Employer | (3) <br> Net Policy Loan Proceeds Available for Loan Repayment | (4) <br> Loan Repayment | (5) <br> Cumulative Loan Due Employer | (6) <br> Executive's <br> Split Dollar <br> Imputed Loan Interest | (7) Income Tax on Split Dollar Imputed Loan Interest | (8) <br> After Tax <br> Bonus <br> Received from <br> Employer | (9) <br> Executive's <br> Net Payment $\begin{gathered} (1)-(2)-(3) \\ +(4)+(7)-(8) \end{gathered}$ | (10) <br> Net Policy Loan Proceeds Available for Retirement Income |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 403,175 |
| 32 | 76 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 415,270 |
| 33 | 77 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 427,728 |
| 34 | 78 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 440,560 |
| 35 | 79 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 453,777 |
| 36 | 80 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 467,390 |
| 37 | 81 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 481,412 |
| 38 | 82 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 495,854 |
| 39 | 83 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 510,730 |
| 40 | 84 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 526,052 |
| 41 | 85 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 541,833 |
| 42 | 86 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 558,088 |
| 43 | 87 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 574,831 |
| 44 | 88 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 592,076 |
| 45 | 89 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 609,838 |
| 46 | 90 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 628,133 |
| 47 | 91 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 646,977 |
| 48 | 92 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 666,387 |
| 49 | 93 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 686,378 |
| 50 | 94 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 706,970 |
| 51 | 95 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 728,179 |
| 52 | 96 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 750,024 |
| 53 | 97 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 772,525 |
| 54 | 98 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 795,701 |
| 55 | 99 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 819,572 |

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

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

Assumed Applicable<br>Federal Rate*夫<br>(See Col. 2)

| Yr | Male Age | (1) <br> Beginning of Year 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) Loan Repayments from Policy Values | (7) <br> Year End Cumulative Loan to Executive | (8) <br> Year End <br> Policy <br> Accum <br> Value* <br> Net of <br> Loan | (9) <br> Year End <br> Policy <br> Cash <br> Value* <br> Net of Loan | (10) <br> Year End <br> Policy <br> Death <br> Benefit* <br> Net of <br> Loan |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 400,000 | 1.01\% | 0 | 0 | 0 | 0 | 400,000 | -52,943 | -191,026 | 9,447,057 |
| 2 | 46 | 400,000 | 1.13\% | 0 | 0 | 0 | 0 | 800,000 | -77,930 | -214,065 | 9,422,070 |
| 3 | 47 | 400,000 | 1.25\% | 0 | 0 | 0 | 0 | 1,200,000 | -72,707 | -206,800 | 9,427,293 |
| 4 | 48 | 400,000 | 1.38\% | 0 | 0 | 0 | 0 | 1,600,000 | -34,842 | -166,797 | 9,465,158 |
| 5 | 49 | 400,000 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 38,295 | -91,475 | 9,538,295 |
| 6 | 50 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 151,902 | 24,364 | 9,651,902 |
| 7 | 51 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 274,660 | 149,402 | 9,774,660 |
| 8 | 52 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 407,306 | 302,949 | 9,907,306 |
| 9 | 53 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 550,638 | 467,133 | 10,050,638 |
| 10 | 54 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 705,516 | 642,911 | 10,205,516 |
| 11 | 55 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 872,870 | 831,117 | 10,372,870 |
| 12 | 56 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,053,705 | 1,032,853 | 10,553,705 |
| 13 | 57 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,257,949 | 1,257,949 | 10,757,949 |
| 14 | 58 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,478,646 | 1,478,646 | 10,978,646 |
| 15 | 59 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,715,660 | 1,715,660 | 11,215,660 |
| 16 | 60 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 1,989,637 | 1,989,637 | 11,489,637 |
| 17 | 61 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 2,282,817 | 2,282,817 | 11,782,817 |
| 18 | 62 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 2,596,175 | 2,596,175 | 12,096,175 |
| 19 | 63 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 2,930,357 | 2,930,357 | 12,430,357 |
| 20 | 64 | 0 | 1.50\% | 0 | 0 | 0 | 0 | 2,000,000 | 3,286,592 | 3,286,592 | 12,786,592 |
| 21 | 65 | 0 | n/a | 0 | 0 | 0 | 2,000,000 | 0 | 5,674,757 | 3,259,757 | 7,085,000 |
| 22 | 66 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 6,090,566 | 3,230,366 | 6,639,800 |
| 23 | 67 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 6,536,468 | 3,199,074 | 6,162,607 |
| 24 | 68 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 7,015,126 | 3,166,654 | 5,651,528 |
| 25 | 69 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 7,529,100 | 3,133,669 | 5,104,569 |
| 26 | 70 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 8,081,962 | 3,101,588 | 4,519,626 |
| 27 | 71 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 8,678,520 | 3,073,000 | 4,201,208 |
| 28 | 72 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 9,322,615 | 3,049,410 | 4,074,898 |
| 29 | 73 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 10,013,825 | 3,027,927 | 3,929,171 |
| 30 | 74 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 10,756,140 | 3,009,943 | 3,762,873 |
|  |  | 2,000,000 |  | 0 | 0 | 0 | 2,000,000 |  |  |  |  |

*This illustration assumes that the currently illustrated, non-guaranteed 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 arrangement presumed terminated in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.

# Loan-Based Split Dollar by a C Corporation Funded With Indexed Universal Life 

Promissory Note Analysis

Assumed<br>Applicable<br>Federal Rate**<br>(See Col. 2)

| Yr | Male Age | (1) <br> Beginning of Year Loan to Executive | (2) <br> Assumed <br> 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 <br> Repayments from <br> Policy <br> Values | (7) <br> Year End Cumulative Loan to Executive | (8) <br> Year End <br> Policy <br> Accum <br> Value* <br> Net of Loan | (9) <br> Year End <br> Policy <br> Cash <br> Value* <br> Net of Loan | (10) <br> Year End <br> Policy <br> Death <br> Benefit* <br> Net of Loan |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 11,554,046 | 2,997,206 | 3,574,908 |
| 32 | 76 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 12,408,488 | 2,987,772 | 3,608,196 |
| 33 | 77 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 13,323,314 | 2,982,448 | 3,648,613 |
| 34 | 78 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 14,302,591 | 2,982,093 | 3,697,223 |
| 35 | 79 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 15,350,648 | 2,987,659 | 3,755,192 |
| 36 | 80 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 16,471,964 | 3,000,066 | 3,823,664 |
| 37 | 81 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 17,671,015 | 3,020,040 | 3,903,591 |
| 38 | 82 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 18,952,706 | 3,048,536 | 3,996,171 |
| 39 | 83 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 20,322,120 | 3,086,474 | 4,102,580 |
| 40 | 84 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 21,783,503 | 3,133,720 | 4,222,895 |
| 41 | 85 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 23,340,311 | 3,189,115 | 4,356,131 |
| 42 | 86 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 24,997,721 | 3,252,972 | 4,502,858 |
| 43 | 87 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 26,759,779 | 3,324,220 | 4,662,209 |
| 44 | 88 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 28,628,991 | 3,399,975 | 4,831,424 |
| 45 | 89 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 30,607,872 | 3,477,074 | 5,007,468 |
| 46 | 90 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 32,697,629 | 3,550,751 | 5,185,632 |
| 47 | 91 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 34,940,869 | 3,657,321 | 5,054,956 |
| 48 | 92 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 37,360,623 | 3,813,192 | 4,934,010 |
| 49 | 93 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 39,987,363 | 4,041,863 | 4,841,611 |
| 50 | 94 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 42,859,671 | 4,374,577 | 4,803,174 |
| 51 | 95 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 46,023,890 | 4,849,954 | 4,849,954 |
| 52 | 96 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 49,423,076 | 5,402,919 | 5,402,919 |
| 53 | 97 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 53,074,997 | 6,042,680 | 6,042,680 |
| 54 | 98 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 56,998,786 | 6,779,368 | 6,779,368 |
| 55 | 99 | 0 | n/a | 0 | 0 | 0 | 0 | 0 | 61,215,052 | 7,624,113 | 7,624,113 |

*This illustration assumes that the currently illustrated, non-guaranteed 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 arrangement presumed terminated in year 21; however, the employer's loans must be repaid no later than the date specified in the plan documentation.


[^0]:    ${ }^{1}$ When using a bonus to assist with the payment of tax on imputed loan interest, care must be taken not to have the executive use these bonus payments to make loan interest payments (or loan repayments) back to the employer. This restriction complies 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). Bonuses used to offset the income tax on imputed income should be acceptable.

[^1]:    ${ }^{1}$ For loan repayment and retirement income for the executive.

[^2]:    ${ }^{1}$ For retirement income.

[^3]:    ${ }^{1}$ When using a bonus to assist with the payment of tax on imputed loan interest, care must be taken not to have the executive use these bonus payments to make loan interest payments (or loan repayments) back to the employer. This restriction complies 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). Bonuses used to offset the income tax on imputed income should be acceptable.

[^4]:    ${ }^{1}$ For loan repayment and retirement income for the executive.

[^5]:    ${ }^{1}$ For retirement income.

