

SERFF Tracking Number: INGD-126333323 State: Arkansas  
 Filing Company: Security Life of Denver Insurance Company State Tracking Number: 43769  
 Company Tracking Number: 1173-PAGE-14  
 TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.002 Joint (Last Survivor)  
 Adjustable Life  
 Product Name: 1173-Page-14  
 Project Name/Number: 1173-Page-14/1173-Page-14

## Filing at a Glance

Company: Security Life of Denver Insurance Company

Product Name: 1173-Page-14 SERFF Tr Num: INGD-126333323 State: Arkansas  
 TOI: L09I Individual Life - Flexible Premium SERFF Status: Closed-Accepted State Tr Num: 43769  
 Adjustable Life For Informational Purposes  
 Sub-TOI: L09I.002 Joint (Last Survivor) Co Tr Num: 1173-PAGE-14 State Status: Filed-Closed  
 Filing Type: Form Reviewer(s): Linda Bird  
 Authors: Wendy Paquin, Terry Stumpf, Jackie Williams, EDS  
 EDSSupport, Laura Sampair Disposition Date: 10/14/2009  
 Date Submitted: 10/13/2009 Disposition Status: Accepted For Informational Purposes  
 Implementation Date: Implementation Date:

Implementation Date Requested: 02/01/2010  
 State Filing Description:

## General Information

Project Name: 1173-Page-14  
 Project Number: 1173-Page-14  
 Requested Filing Mode: Informational

Explanation for Combination/Other:  
 Submission Type: New Submission  
 Overall Rate Impact:  
 Filing Status Changed: 10/14/2009

Deemer Date:  
 Submitted By: Wendy Paquin  
 Filing Description:  
 Insurance Commissioner  
 Department of Insurance  
 Compliance Life & Health  
 1200 West Third Street  
 Little Rock, Arkansas 72201-1904

Status of Filing in Domicile: Not Filed  
 Date Approved in Domicile:  
 Domicile Status Comments: This filing is exempt in Colorado, our state of domicile.  
 Market Type: Individual  
 Group Market Size:  
 Group Market Type:  
 Explanation for Other Group Market Type:  
 State Status Changed: 10/14/2009  
 Created By: Wendy Paquin  
 Corresponding Filing Tracking Number:

SERFF Tracking Number: INGD-12633323 State: Arkansas  
Filing Company: Security Life of Denver Insurance Company State Tracking Number: 43769  
Company Tracking Number: 1173-PAGE-14  
TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.002 Joint (Last Survivor)  
Adjustable Life  
Product Name: 1173-Page-14  
Project Name/Number: 1173-Page-14/1173-Page-14

Re: Security Life of Denver Insurance Company  
NAIC #68713 FEIN #84-0499703

Form Number:

Add Guaranteed Minimum Interest Rate Credited on Loans to Schedule Page 4C and Page 14 of  
1173-01/07 Last Survivor Flexible Premium Adjustable Universal Life Insurance Policy

Attention Policy Form Approval Division:

We submit Schedule Page 4C and Page 14 of the above referenced form for your information. The pages replace  
Schedule Page 4C and Page 14 which were approved by your department on 07/27/2009 and 11/16/2006, respectively.

The pages do not contain any unusual or controversial items from the standpoint of industry standards.

We are exempt from filing in Colorado, our state of domicile, pursuant to Colorado Bulletin B-4.1 (May 8, 2007).

Schedule page 4C has been modified to add the Guaranteed Minimum Interest Rate Credited on Loans.

The second paragraph of the Policy Loan Interest provision on page 14 has been modified to say:

The portion of the Account Value subject to a policy loan may accumulate at a different rate of interest than the portion  
not subject to a loan, but will not accumulate at a rate which is less than the Guaranteed Minimum Interest Rate  
Credited on Loans shown in your Schedule.

The information bracketed in the schedule page is subject to change.

The following previously approved form(s) will be marketed with the submitted pages (approval date(s) provided):

1173-01/07 - Last Survivor Flexible Premium Adjustable Universal Life Insurance Policy - 11/16/2006

Unless otherwise informed, we reserve the right to alter the layout of the enclosed form, including sequential ordering of  
the sections, color, and type font and size, and any changes necessary to comply with your state requirements, but we  
will only do so if such changes are within the allowable parameters or requirements set forth in your statutes.

To the best of our knowledge, the form complies with the laws and regulations of the insurance department of your  
state.

SERFF Tracking Number: INGD-126333323 State: Arkansas  
 Filing Company: Security Life of Denver Insurance Company State Tracking Number: 43769  
 Company Tracking Number: 1173-PAGE-14  
 TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.002 Joint (Last Survivor)  
 Adjustable Life  
 Product Name: 1173-Page-14  
 Project Name/Number: 1173-Page-14/1173-Page-14

Sincerely,

Wendy Paquin, FLMI, CLU  
 Senior Contract Analyst  
 (612) 342-3595  
 (612) 342-7531 (fax)  
 wendy.paquin@us.ing.com

## Company and Contact

### Filing Contact Information

Wendy Paquin, wendy.paquin@us.ing.com  
 20 Washington Ave South 612-342-3595 [Phone]  
 Minneapolis, MN 55401 612-342-7531 [FAX]

### Filing Company Information

Security Life of Denver Insurance Company CoCode: 68713 State of Domicile: Colorado  
 1290 Broadway Group Code: 229 Company Type: Life Insurance  
 Denver, CO 80203-5699 Group Name: State ID Number:  
 (303) 860-2348 ext. [Phone] FEIN Number: 84-0499703

-----

## Filing Fees

Fee Required? Yes  
 Fee Amount: \$50.00  
 Retaliatory? No  
 Fee Explanation: 1 policy x \$50 per policy = \$50  
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Security Life of Denver Insurance Company	\$50.00	10/13/2009	31249661

SERFF Tracking Number: *INGD-126333323* State: *Arkansas*  
Filing Company: *Security Life of Denver Insurance Company* State Tracking Number: *43769*  
Company Tracking Number: *1173-PAGE-14*  
TOI: *L09I Individual Life - Flexible Premium* Sub-TOI: *L09I.002 Joint (Last Survivor)*  
*Adjustable Life*  
Product Name: *1173-Page-14*  
Project Name/Number: *1173-Page-14/1173-Page-14*

## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Informational Purposes	Linda Bird	10/14/2009	10/14/2009



SERFF Tracking Number: *INGD-126333323* State: *Arkansas*  
 Filing Company: *Security Life of Denver Insurance Company* State Tracking Number: *43769*  
 Company Tracking Number: *1173-PAGE-14*  
 TOI: *L09I Individual Life - Flexible Premium* Sub-TOI: *L09I.002 Joint (Last Survivor)*  
*Adjustable Life*  
 Product Name: *1173-Page-14*  
 Project Name/Number: *1173-Page-14/1173-Page-14*

<b>Schedule</b>	<b>Schedule Item</b>	<b>Schedule Item Status</b>	<b>Public Access</b>
<b>Supporting Document</b>	Flesch Certification		No
<b>Supporting Document</b>	Application		No
<b>Supporting Document</b>	Health - Actuarial Justification		No
<b>Supporting Document</b>	Outline of Coverage		No
<b>Supporting Document</b>	Page 14		No
<b>Supporting Document</b>	Page 4C		No

SERFF Tracking Number: *INGD-126333323* State: *Arkansas*  
 Filing Company: *Security Life of Denver Insurance Company* State Tracking Number: *43769*  
 Company Tracking Number: *1173-PAGE-14*  
 TOI: *L09I Individual Life - Flexible Premium* Sub-TOI: *L09I.002 Joint (Last Survivor)*  
*Adjustable Life*  
 Product Name: *1173-Page-14*  
 Project Name/Number: *1173-Page-14/1173-Page-14*

## Supporting Document Schedules

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b> Flesch Certification		
<b>Comments:</b>		
<b>Attachments:</b>		
AR Certification Reg 19 and 49.pdf		
AR Consent to Submit Rates - 1173.pdf		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b> Application		
<b>Bypass Reason:</b> Not applicable		
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b> Outline of Coverage		
<b>Bypass Reason:</b> Not applicable		
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b> Page 14		
<b>Comments:</b>		
<b>Attachment:</b>		
1173 Page 14 Basic.pdf		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b> Page 4C		
<b>Comments:</b>		

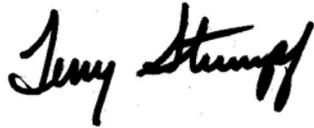


**ARKANSAS  
CERTIFICATION**

RE: Add Guaranteed Minimum Interest Rate Credited on Loans to  
Pages 4C and 14 of 1173-01/07

As an officer of Security Life of Denver Insurance Company, I certify that this submission meet the provisions of Regulation 19 (unfair sex discrimination in the sale of life insurance), Regulation 49 (guaranty association notice) and all applicable requirements of the Arkansas Insurance Department.

**SECURITY LIFE OF DENVER INSURANCE COMPANY**



By: \_\_\_\_\_  
Terry Stumpf, Assistant Secretary

Date: October 9, 2009

ARKANSAS EXHIBIT A (REVISED)

CONSENT TO SUBMIT RATES  
AND/OR COST BASES FOR APPROVAL

The Security Life of Denver Insurance Company ("Company") of Denver, Colorado does hereby  
(Company Name) (City and State)

consent and agree:

A) that all premium rates and/or cost bases both "maximum" and current or projected", used in relation to policy form number 1173-01/07 must be filed with the Insurance Commissioner for the State of Arkansas ("Commissioner") at least sixty (60) days prior to their proposed effective date. Such rates and/or cost bases shall be deemed effective sixty (60) days after they are filed with the consent Commissioner, unless the Commissioner shall approve or disapprove such rates and/or cost bases prior to the expiration of sixty (60) days.

or

B) that where the policy is a flexible or indeterminate premium whole life policy which provides for frequent changes in interest rates based on financial market conditions, the company may file a range of rates it will stay within and will notify the Department at least sixty (60) days prior to any change in the range of rates. The company must also document the method used to calculate its premium and range of rates.

Security Life of Denver Insurance Company  
(Company Name)



By Joseph F. Acri, ASA, MAAA  
(Name)

Associate Actuary  
(Title or Position)

## **ADJUSTMENT TO POLICY COST FACTORS**

We may periodically change the rates for the cost of insurance and other expense charges, or the interest rates we credit to the Account Value. Any changes will be based on our expectations of the following future cost factors: mortality, expenses including taxes, persistency, investment earnings and reinsurance. Any change will apply to all policies of the same gender, Age, and premium class for both Insureds that have been in force for the same period of time. The cost of insurance and expense charge rates will never exceed the guaranteed maximum rates shown in your Schedule, as adjusted for any ratings. The interest rates we credit to the Account Value will never be less than the Guaranteed Minimum Interest Rate shown in your Schedule. We will not adjust cost of insurance rates, expense charges or the interest rates we credit to the Account Value to recover past losses.

## **POLICY LOAN PROVISIONS**

### **POLICY LOANS**

The outstanding policy loan amount equals:

- a. The policy loan amount as of the beginning of the policy year; plus
- b. New policy loans; plus
- c. Accrued interest; minus
- d. Policy loan repayments.

You may obtain a policy loan on or after the first monthly processing date. The maximum amount you may borrow at any time equals:

- a. The Account Value on the date of your policy loan request; minus
- b. Any outstanding policy loan, including accrued but unpaid policy loan interest to the next policy anniversary; minus
- c. The current monthly deductions times the number of policy months to the next policy anniversary; or times 13 if you take a policy loan within the 30 day period before the next policy anniversary.

The minimum amount you may borrow is shown in your Schedule. Your written policy loan request must be sent on a form acceptable to us to the ING Customer Service Center. We may defer payment for up to 6 months.

If the policy loan amount and any policy loan accrued interest equals or exceeds the Account Value, a premium sufficient to keep your policy in force must be paid. See the Grace Period section for details.

### **POLICY LOAN INTEREST**

The guaranteed maximum annual policy loan interest rate is shown in your Schedule. The current policy loan interest rate may be less than the maximum rate and may change from time to time. If a policy loan is made, policy loan interest is due and payable at the end of each policy year. If policy loan interest is not paid when due, it is added to the policy loan.

The portion of the Account Value subject to a policy loan may accumulate at a different rate of interest than the portion not subject to a loan, but will not accumulate at a rate which is less than the Guaranteed Minimum Interest Rate Credited on Loans shown in your Schedule.

## SCHEDULE (CONTINUED)

### REFUND OF SALES CHARGE

- |    |   |                 |  |
|----|---|-----------------|--|
| a. | Guaranteed Minimum Refund of Sales Charge. See the Refund of Sales Charge section for details | Policy year 1   | 5.0% of total eligible premium paid                          |
|    |   | Policy year 2   | 2.5% of total eligible premium paid in the first policy year |
|    |   | Policy years 3+ | 0.0%   |

### POLICY TRANSACTION CHARGES

- |    |                                |   |
|----|--------------------------------|---|
| a. | Policy Illustrations:          | \$25.00 charge for each illustration after the first in a policy year |
| b. | Policy Withdrawal Service Fee: | See the Partial Withdrawal section below for details                  |

### POLICY LOANS

- |    |   |  |       |
|----|---|--|-------|
| a. | Guaranteed Maximum Policy Loan Interest Rate:       | Policy years 1-10                        | 3.75% |
|    |   | Policy years 11+                         | 3.15% |
| b. | Guaranteed Minimum Interest Rate Credited on Loans: | 3.00%                                    |       |
| c. | Minimum Policy Loan Amount:                         | \$100                                    |       |
| d. | Maximum Policy Loan Amount:                         | See the Policy Loans section for details |       |

### PARTIAL WITHDRAWALS

- |    |                                    |   |
|----|------------------------------------|---|
| a. | Minimum Partial Withdrawal Amount: | \$100   |
| b. | Maximum Partial Withdrawal Amount: | Amount which will leave \$500.00 as the Net Account Value |
| c. | Partial Withdrawal Service Fee:    | \$10.00   |
| d. | Limit on Partial Withdrawals:      | Twelve (12) per policy year                               |

### GUARANTEED MINIMUM INTEREST RATE

- |    |                                   |  |         |
|----|-----------------------------------|--|---------|
| a. | Guaranteed Minimum Interest Rate: | Policy years 1+  | [2.00]% |
| b. | Credited Interest Rate:           | Interest is credited at the guaranteed rate shown or may be credited at a higher rate. Any higher rate is guaranteed to be in effect for at least 12 months after each policy anniversary. |         |

### ADDITIONAL INTEREST CREDITING BONUS RATE

- |    |  |                    |       |
|----|--|--------------------|-------|
| a. | Non-Guaranteed Additional Interest Crediting Bonus Rate: | Policy years 1-10  | 0.00% |
|    |  | Policy years 11-15 | 0.50% |
|    |  | Policy years 16+   | 0.60% |