Filing at a Glance

Company: Minnesota Life Insurance Company

Product Name: Surrender Value Enhancement Agreement	SERFF Tr Num: MNNL-126020933	State: ArkansasLH
TOI: L08 Life - Other	SERFF Status: Closed	State Tr Num: 41444
Sub-TOI: L08.000 Life - Other	Co Tr Num: 09-937	State Status: Approved-Closed
Filing Type: Form	Co Status:	Reviewer(s): Linda Bird
	Authors: Carol Ouhl, Joyce Townsend	Disposition Date: 02/05/2009
	Date Submitted: 02/04/2009	Disposition Status: Approved
Implementation Date Requested: 03/17/2009		Implementation Date:

State Filing Description:

General Information

Project Name: SVEA
Project Number: 09-937
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:
Filing Status Changed: 02/05/2009
State Status Changed: 02/05/2009
Corresponding Filing Tracking Number:

Status of Filing in Domicile: Pending
Date Approved in Domicile:
Domicile Status Comments:
Market Type: Individual
Group Market Size:
Group Market Type:

Deemer Date:

Filing Description:

NAIC #: 66168

GROUP #: 869

FEIN #: 41-0417830

RE: Individual Life Rider for Issue with Indexed Universal Life

09-937 - Surrender Value Enhancement Agreement

This agreement is new and does not replace any previously approved forms. It is designed to be offered with our previously approved individual flexible premium indexed universal life contract, Eclipse Indexed Life (06-700), approved 07-07-2006, SERFF #USPH-6PNQJB779, DOI #32713.

The agreement will be marketed with an illustration of our Eclipse product. The Flesch score for this agreement is 53.0. It can only be added at issue and will be active for a specific period of time - currently 4 years.

This agreement provides essentially a living benefit, since it provides a higher cash surrender value than would be the case if the agreement were not attached to the policy. It is intended for use in cases where businesses will be the policy owners. In addition, it will be purchased by owners of contracts who will be heavily funding the policy i.e., where the premiums paid will be close to the maximum allowed - that is, premiums close to Modified Endowment Contract (MEC) limits.

Included with this filing is a sample set of policy data pages for the Eclipse policy displaying the SVEA agreement information. An Actuarial Memorandum for the agreement is also included.

Company and Contact

Filing Contact Information

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Filing Company Information

Minnesota Life Insurance Company	CoCode: 66168	State of Domicile: Minnesota
400 Robert Street North	Group Code: 869	Company Type:
Law Department		
St. Paul, MN 55101-2098	Group Name:	State ID Number:
(651) 665-3500 ext. [Phone]	FEIN Number: 41-0417830	

Filing Fees

Fee Required?	Yes
Fee Amount:	$75.00
Retaliatory?	Yes
Fee Explanation:	MN filing fee = $75 per filing package.
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Minnesota Life Insurance Company	$75.00	02/04/2009	25492558

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Linda Bird	02/05/2009	02/05/2009

Disposition

Disposition Date: 02/05/2009

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number:	*MNNL-126020933*	*State:*	*Arkansas*
Filing Company:	*Minnesota Life Insurance Company*	*State Tracking Number:*	*41444*
Company Tracking Number:	*09-937*		
TOI:	*L08 Life - Other*	*Sub-TOI:*	*L08.000 Life - Other*
Product Name:	*Surrender Value Enhancement Agreement*		
Project Name/Number:	*SVEA/09-937*		

Item Type	Item Name	Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		No
Supporting Document	Actuarial Memorandum		No
Supporting Document	Policy Data Pages and Memo of Variability		Yes
Form	Surrender Value Enhancement Agreement		Yes

Form Schedule

Lead Form Number: 09-937

Review Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	09-937	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider	Surrender Value Enhancement Agreement	Initial		53	09-937 SVEA for Eclps.pdf

Surrender Value Enhancement Agreement

This agreement is a part of the policy to which it is attached and is subject to all its terms and conditions.

This agreement is effective as of the original policy date of this policy.

What does this agreement provide?

This Surrender Value Enhancement Agreement, (SVEA), provides that the surrender value of the policy at full surrender while this agreement is inforce will be no less than the SVEA Surrender Value described below.

What is the SVEA Surrender Value?

Subject to the SVEA Limitations described below, the SVEA Surrender Value is equal to the cumulative premium payments you have made on the policy.

What are the SVEA Limitations?

The SVEA Limitations are:

1. The cumulative premium payments at each policy anniversary must be at least as large as the SVEA Thresholds shown on the SVEA policy data page.
2. The SVEA Surrender Value is available only at a full surrender.
3. The SVEA Surrender Value is not available for any partial surrender or policy loan.

Is there a monthly policy charge for this agreement?

Yes. As long as this agreement is in force, we will assess an agreement charge each month against your accumulation value. The monthly agreement charge will not exceed the maximum amount that is shown on the SVEA policy data page.

When will this agreement terminate?

This agreement will terminate on the earliest of:

1. The date this policy is surrendered or otherwise terminates;
2. The date you terminate this agreement;
3. The policy anniversary where cumulative premium payments are less than the SVEA Threshold at that policy anniversary;
4. The date any partial surrender or policy loan is taken from this policy; and
5. The termination date of this agreement as shown on the policy data pages.

[Dennis E. Prohofsky Robert L. Senkler

Secretary President]

Rate Information

Rate data does NOT apply to filing.

Supporting Document Schedules

Review Status:

Satisfied -Name: Flesch Certification 02/04/2009

Comments:

Attached is Certification of Compliance.

Attachment:

Certification of Compliance.pdf

Review Status:

Satisfied -Name: Policy Data Pages and Memo of Variability 02/04/2009

Comments:

Attached is copy of the Eclipse policy data pages with the SVEA agreement, along with the memo of variability for the pages.

Attachments:

06-701 Data Pages SVEA on Eclipse.pdf

Memo of Variability SVEA.pdf

Securian Financial Group, Inc.
400 Robert Street North
St. Paul, MN 55101-2098
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SECURIAN™

CERTIFICATION OF COMPLIANCE

Minnesota Life Insurance Company certifies that it has reviewed and is in compliance with the following Arkansas Rules and Regulations and Statutes.

Rule and Regulation 19	Unfair Sex Discrimination
Rule and Regulation 49	Guaranty Association Notice
Rule and Regulation 33	Universal Life Insurance
Arkansas Statute 23-80-206	Flesch Certification
Arkansas Statute 23-79-138	Contact Notice

Digitally signed by Matthew Harrington, Assistant Secretary
DN: cn=Matthew Harrington, Assistant Secretary, o=Minnesota Life Insurance Company, ou=Law, email=matthew.harrington@securian.com, c=US
Location: Minnesota Life Insurance Company
Date: 2009.02.04 10:12:47 -06'00'

Name: Matthew Harrington

Title: Assistant Secretary

Date: February 4, 2009

Eclipse Indexed Life Policy

A flexible premium universal life policy with indexed features

Insured:	[John A. Doe]
Issue Age:	[35]
Gender:	[Male]
Policy Number:	[1-000-000W]
Policy Date:	[April 1, 2006]
[Policy Change Date:	April 1, 2013]
Death Benefit Option:	[Level]

Premium

Monthly Initial Minimum Premium:	[$110.34] effective [April 1,2006]
Planned Premium:	[$937.50 Quarterly]

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Basic Policy

	Coverage Layer Amount
Coverage Layer	[$500,000]
Effective: [April 1 2006]	
Age: [35]	
Risk Class: [Preferred Non-Tobacco]	
[Cash Extra: $100.00 monthly charge until April 1 2018]	
[Includes Waiver of Premium Agreement until age 60.]	
[Includes Waiver of Charges Agreement until age 60.]	
Total Face Amount -	[$500,000]

Additional Agreements

[Surrender Value Enhancement Agreement
Effective: [April 1 2006]
Terminates: [April 1 2010]
There is a monthly charge for this agreement.]

Information about the Available Accounts

Fixed Account:

[Fixed Account A]:	[Long Term Strategy]

Indexed Account:

[Indexed Account A]:	[*Standard & Poor's 500® Composite Stock Price Index excluding dividends, or its successor ("the index").]
Segment Term:	[1 year]
Participation Rate:	[100%]
Growth Cap:	[14% in effect on April 1, 2006]

[* "S&P 500®" is a trademark of The McGraw-Hill Companies, Inc. and has been licensed for use by Minnesota Life Insurance Company. This contract is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of purchasing this contract. The term "Standard & Poor's 500 Index®" refers to the Standard & Poor's 500 Composite Stock Price Index.]

Other Important Information

Transfer Date:	[The 3rd Friday of each month].
Death Benefit Qualification Test:	[Guideline Premium Test]
Guaranteed Interest Rate:	3%
Net Amount at Risk Divisor:	[1.002466]
Fixed Policy Loan Interest Rate:	[4%]
Variable Policy Loan Interest Rate:	[5.5% effective through May 31, 2006]

Other Important Information

[Guideline Premium Test Death Benefit Percentage Factors:

Age	Percentage	Age	Percentage	Age	Percentage
0-40	250%	54	157%	68	117%
41	243%	55	150%	69	116%
42	236%	56	146%	70	115%
43	229%	57	142%	71	113%
44	222%	58	138%	72	111%
45	215%	59	134%	73	109%
46	209%	60	130%	74	107%
47	203%	61	128%	75-90	105%
48	197%	62	126%	91	104%
49	191%	63	124%	92	103%
50	185%	64	122%	93	102%
51	178%	65	120%	94	101%
52	171%	66	119%	95-121	100%]
53	164%	67	118%		

[Non-Tobacco] Maximum Monthly Cost of Insurance Rates

The [non-tobacco] maximum monthly cost of insurance rates are listed per $1,000 of net amount at risk. For a special risk class the cost of insurance rates are a multiple of the rating percentage and never larger than 83.3333. The rate is applied to the base coverage and to the [Death Benefit Guarantee Agreement][Term Insurance Agreement].

AGE	RATE	AGE	RATE	AGE	RATE	AGE	RATE
35	0.09089	60	0.74695	85	10.14422	110	77.04001
36	0.09589	61	0.83114	86	11.31891	111	83.33333
37	0.10007	62	0.93398	87	12.62238	112	83.33333
38	0.10758	63	1.04963	88	14.04388	113	83.33333
39	0.11425	64	1.17137	89	15.57220	114	83.33333
40	0.12176	65	1.30009	90	17.19964	115	83.33333
41	0.13178	66	1.43072	91	18.76184	116	83.33333
42	0.14430	67	1.56327	92	20.42406	117	83.33333
43	0.15850	68	1.70627	93	22.21645	118	83.33333
44	0.17520	69	1.85467	94	24.15514	119	83.33333
45	0.19441	70	2.03500	95	26.24420	120	83.33333
46	0.21279	71	2.23720	96	28.20561		
47	0.23285	72	2.50360	97	30.35199		
48	0.24455	73	2.78562	98	32.70866		
49	0.25793	74	3.08342	99	35.30337		
50	0.27717	75	3.41024	100	38.17512		
51	0.29975	76	3.76820	101	40.53000		
52	0.33071	77	4.18587	102	43.11768		
53	0.36419	78	4.67661	103	45.96629		
54	0.40691	79	5.24717	104	49.11195		
55	0.45970	80	5.87410	105	52.54884		
56	0.51338	81	6.59415	106	56.37067		
57	0.57128	82	7.35120	107	60.64050		
58	0.62083	83	8.17591	108	65.43820		
59	0.67798	84	9.09944	109	70.86240		

Surrender Charge

The Surrender Charge will be assessed against the accumulation value at the time this policy is surrendered in full.

Amount	Through	Amount	Through	Amount	Through
[11,895.39	05/2006	10,323.09	09/2009	5,096.21	01/2013
11,895.39	06/2006	10,192.42	10/2009	4,965.54	02/2013
11,895.39	07/2006	10,061.74	11/2009	4,834.86	03/2013
11,895.39	08/2006	9,931.07	12/2009	4,704.19	04/2013
11,895.39	09/2006	9,800.40	01/2010	4,573.52	05/2013
11,895.39	10/2006	9,669.73	02/2010	4,442.85	06/2013
11,895.39	11/2006	9,539.06	03/2010	4,312.18	07/2013
11,895.39	12/2006	9,408.38	04/2010	4,181.50	08/2013
11,895.39	01/2007	9,277.71	05/2010	4,050.83	09/2013
11,895.39	02/2007	9,147.04	06/2010	3,920.16	10/2013
11,895.39	03/2007	9,016.37	07/2010	3,789.49	11/2013
11,895.39	04/2007	8,885.70	08/2010	3,658.82	12/2013
11,757.32	05/2007	8,755.02	09/2010	3,528.14	01/2014
11,757.32	06/2007	8,624.35	10/2010	3,397.47	02/2014
11,757.32	07/2007	8,493.68	11/2010	3,266.80	03/2014
11,757.32	08/2007	8,363.01	12/2010	3,136.13	04/2014
11,757.32	09/2007	8,232.34	01/2011	3,005.46	05/2014
11,757.32	10/2007	8,101.66	02/2011	2,874.78	06/2014
11,757.32	11/2007	7,970.99	03/2011	2,744.11	07/2014
11,757.32	12/2007	7,840.32	04/2011	2,613.44	08/2014
11,757.32	01/2008	7,709.65	05/2011	2,482.77	09/2014
11,757.32	02/2008	7,578.98	06/2011	2,352.10	10/2014
11,757.32	03/2008	7,448.30	07/2011	2,221.42	11/2014
11,757.32	04/2008	7,317.63	08/2011	2,090.75	12/2014
11,615.53	05/2008	7,186.96	09/2011	1,960.08	01/2015
11,615.53	06/2008	7,056.29	10/2011	1,829.41	02/2015
11,615.53	07/2008	6,925.62	11/2011	1,698.74	03/2015
11,615.53	08/2008	6,794.94	12/2011	1,568.06	04/2015
11,615.53	09/2008	6,664.27	01/2012	1,437.39	05/2015
11,615.53	10/2008	6,533.60	02/2012	1,306.72	06/2015
11,615.53	11/2008	6,402.93	03/2012	1,176.05	07/2015
11,499.14	12/2008	6,272.26	04/2012	1,045.38	08/2015
11,368.46	01/2009	6,141.58	05/2012	914.70	09/2015
11,237.79	02/2009	6,010.91	06/2012	784.03	10/2015
11,107.12	03/2009	5,880.24	07/2012	653.36	11/2015
10,976.45	04/2009	5,749.57	08/2012	522.69	12/2015
10,845.78	05/2009	5,618.90	09/2012	392.02	01/2016
10,715.10	06/2009	5,488.22	10/2012	261.34	02/2016
10,584.43	07/2009	5,357.55	11/2012	130.67	03/2016
10,453.76	08/2009	5,226.88	12/2012	0.00	04/2016]

Other Policy Charges

Premium Charge

A maximum of 7.0% of each premium paid.

Monthly Policy Charge

The Monthly Policy Charge will not exceed $12.00 per month plus $0.0125 per $1,000 of face amount per month.

Transaction Charge

The maximum Transaction Charge is $100.00 per transaction.

Policy Issue Charge

Each of the following Policy Issue Charge(s) will be assessed monthly for 10 years against the accumulation value.

Amount	Effective	Until
[81.67	04/01/2006	04/01/2016]

[Surrender Value Enhancement Agreement (SVEA)

SVEA Agreement Charge:	A maximum monthly charge of [$.05] per [$1,000 of Face Amount] is assessed against the Accumulation Value.

Schedule of Surrender Value Enhancement Thresholds

The SVEA Threshold at each policy anniversary is shown below.

Anniversary April 1	Threshold
2007	$15,000
2008	$30,000
2009	$45,000
2010	$60,000]

ECLIPSE INDEXED UNIVERSAL LIFE Policy Form 06-700
STATEMENT of VARIABILITY
for
POLICY DATA PAGES

SECTION:	VARIABLE DATA	Explanation
Insured	36 characters	Individual Insured's Name
Age	0 through 85	Issue Age
Gender	Male Female Unisex	Defines Gender for rates
Policy Date	Effective Date of the policy	Defines policy as a new issue
Policy Change Date	Policy Change Date: Month, DD, CCYY	**A.**This only prints at the point when a policy change has been made. **B.**Once the first policy change has been made, this section will always print and only the date will be updated to the most current change date.
Death Benefit Option	Level Increasing Sum of Premiums	Displays Death Benefit Option in effect as of the policy date
Monthly Initial Minimum Premium	Amount ($x,xxx,xxx.xx) Date (Month, DD, CCYY)	**A.** Defines the minimum amount of premium required to put the policy inforce **B.** the effective date of coverage
Planned Premium	$X,XXX,XXX.XX Monthly $X,XXX,XXX.XX Quarterly $X,XXX,XXX.XX Semiannually $X,XXX,XXX.XX Annually	Defines premium amount and mode the owner indicates intention to pay.
Basic Policy – Coverage Layer	All information* in each coverage layer is specific to that layer. *(a) Effective date (b) age (c) risk class (d) cash extra (e) waiver	**(a)** New issue creates one coverage layer with the effective date of issue. **(b)** Age as of effective date. **(c)** one of the 7 risk classes shown in the next section **(d)** Cash extra can be either temporary or permanent dependent upon extra risk of health or avocation. **(e)** Only one of the two Waivers is allowed on the policy at one time. The appropriate waiver type will print
Risk Class	Preferred Select Non-Tobacco Preferred Non-Tobacco Preferred Tobacco Standard Non-Tobacco Standard Tobacco Special Risk XXX% Tobacco Special Risk XXX% Non-Tobacco	The risk class and tobacco status can be unique to each coverage layer.

SECTION:	VARIABLE DATA	Explanation
Additional Agreements	Exchange of Insureds Agreement Waiver of Premium Agreement * Waiver of Charges Agreement * Term Insurance Agreement Accelerated Death Benefit Agreement Death Benefit Guarantee Agreement Interest Accumulation Agreement Overloan Protection Agreement Early Values Agreement Surrender Value Enhancement Agreement *Waiver is specific to coverage layer and displays under the coverage layer rather than in the list of Additional Agreements	**(a)** Lists optional agreements available for this policy. **(b)** Only those Optional agreements chosen by owner will print. **(c)** If no agreements chosen, this section will not print. **(d)** Cannot have both Death Benefit Guarantee and Term Insurance Agreements at same time. **(e)** Cannot have both Waivers at same time. **(f)** Waiver displays with its respective coverage layer and not in Agreements section.
Account Information	Fixed Account Indexed Account	Defines types of accounts available
Fixed Account	Fixed Account A Fixed Account B Fixed Account C, Fixed Account D, etc.	Itemizes all the Fixed Accounts the company is offering at that point in time and their respective short description. This does not display only those specific Fixed Accounts chosen, if any, by the owner
Indexed Account	Indexed Account A Indexed Account B Indexed Account C Indexed Account D, etc.	Itemizes the Indexed Accounts available at that point in time and their respective short description. All accounts will always display regardless of the specific accounts chosen by the owner.
Indexed Account A	Itemizes each Account's details: a. short description of the Index(s) b. Segment Term: 1 yr (guaranteed for life of the policy) c. 40% through 100% d. 03% through 100% e. Full legal description and disclosure of legal permission to use said description of each Index	Itemizes each Account's details: a. legal short description of the Index(s) b. Segment Term – Length of time segment maintains the same participation rate and growth cap c. Participation Rate guaranteed for contract. Not anticipated to change. If it changes, would apply to new issues only. d. Growth Cap for that Account at issue or policy change e. Includes asterisked paragraphs with full description of the external Index and permission to use the index.

SECTION:	VARIABLE DATA	Explanation
"Other Important Information" Transfer Date	Currently the 3rd Friday of each month. Could be any day of the month.	Date money is transferred from the interim account to the fixed and / or indexed accounts or between the fixed and indexed accounts. Not anticipated to change. If it changes, new transfer date would apply to new issues only.
Death Benefit Qualification Test	Cash Value Accumulation Test, or Guideline Premium Test	IRS life insurance qualification test is chosen by owner at issue. Once chosen, cannot change.
Guaranteed Interest Rate	3% guaranteed for life of policy Possible future range 1% to 7%	Not anticipated to change. If it changes, new guaranteed rate would apply to new issues only.
Net Amount at Risk Divisor	1.002466 guaranteed for life of policy Function of Guaranteed Interest Rate	Not anticipated to change. If it changes, would apply to new issues only.
Fixed Policy Loan Interest Rate	4% for duration of any fixed loan Range possible is 2% - 8%	4% for the length of loan. Not anticipated to change. If it changes, new rate will apply to new issues only
Variable Policy Loan Interest Rate	0% to 8%	a) Rate in effect on a given date and the period during which that rate is in effect. b) Defines the variable loan interest rate in effect at issue date or policy change date to the end of a maximum of 2 months following policy date c) The interest rate valid from the date in "b" above to the next anniversary. d) Varies annually based on outside index.
"Other Important Information"	Guideline Premium Test Death Benefit Percentage Factors page (Factors do not change)	This page will only print if the Guideline Premium Test is chosen by the owner.
Maximum Monthly Cost of Insurance Rates page(s)	Tobacco Non-Tobacco If smoking status changes, could have two pages of Max Monthly COI Rates	COI rates vary by Tobacco Status of risk class. Tobacco Status stated in page title and first sentence.
Text paragraph at top of Max Mo COI rates pages; The rate is applied to the base and agreement shown, if any.	the Death Benefit Guarantee Agreement, or the Term Insurance Agreement	Owner may choose only one of the two optional agreements which are reflected in this section. The same Max Mo COI applies to the rider chosen as well.
Surrender Charge page	Charge amounts for respective months will vary with each policy	Surrender Charge assessed against accumulation value when the policy is surrendered

SECTION:	VARIABLE DATA	Explanation
Other Policy Charges	Premium Charge Monthly Policy Charge Transaction Charge Policy Issue Charge Waiver of Premium Agreement Charge Waiver of Charges Agreement Charge	The first four charges always appear. One of the two Waiver charges only appear if one of the two Agreements is chosen.
Premium Charge	7% for the life of the contract 0% to 10%	Maximum percent of premium charged against all premiums each time a premium is applied. If percent is over the premium. Anything over the maximum will apply to new issues only.
Monthly Policy Charge	$12.00 per mo plus $0.0125 per 1,000 of face amount per mo.	Maximum charge against face amount.
Transaction Charge	$100 maximum guaranteed for life of the contract	Maximum cost charged for policy transaction. If maximum changes it will apply to new issues only.
Policy Issue Charge	$0 to $999,999	Monthly charge against accumulation value for the first 10 years after issue or a face amount increase
Waiver of Premium Agreement Charge Waiver of Charges Agreement Charge	Amount and beginning and ending effective dates will vary with each policy and at every policy change date	Defines monthly charges that will apply if policyholder chooses either of the Waiver agreements.
Schedule of Monthly Premiums to Waive	Details the exact premium that will be paid at each age when disability might occur	This page only prints if owner chooses the Waiver of Premium Agreement.
Death Benefit Guarantee Agreement Account Value Information page	0% to 12%	DBGA Interest Rate
	Maximum of 20% of each premium paid	DBGA Premium Charge
	Currently 1.004868 This is a function of the DBGA interest rate	DBGA net amount at risk divisor Not anticipated to change. If divisor changes it will apply to new issue only
	Amount, Effective Date, End Date All Risk Classes Previously Declared	DBGA Policy Issue Charge assessed monthly for 10 years on each increase in net amount at risk
Schedule of __*_____ Maximum Monthly Cost of Insurance Rates	Preferred Select Non-Tobacco Preferred Non-Tobacco Preferred Tobacco Standard Non-Tobacco Standard Tobacco Special Risk XXX% Tobacco Special Risk XXX% Non-Tobacco	The risk class and tobacco status are unique to the DBGA. The special risk sentence only prints if the DBGA has a special risk on it.

Surrender Value Enhancement Agreement Charge	Currently $.05 per $1,000 of Face Amount Rate: $.05 to $1.00 Per: $1,000 of Face Amount or $1,000 of Net Amount at Risk, or $1,000 of Accumulation Value	SVEA charge can vary within the range stated. If the charges changes to something outside of the stated range, the new charge will be refiled and will apply only to new issues of this product. SVEA charge can be per $1,000 of Face Amount or per $1,000 of Net Amount at Risk, or per $1,000 of Accumulation Value. Changes to the charge will be made to new issues of this product

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