

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
Filing Company: American Equity Investment Life Insurance Company State Tracking Number: 50003
Company Tracking Number: SOV
TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
Product Name: SOV
Project Name/Number: SOV/SOV

Filing at a Glance

Company: American Equity Investment Life Insurance Company

Product Name: SOV

TOI: A10 Annuities - Other

Sub-TOI: A10.000 Annuities - Other

Filing Type: Form

SERFF Tr Num: AMEQ-127704192 State: Arkansas

SERFF Status: Closed-Approved-
Closed State Tr Num: 50003

Co Tr Num: SOV

Authors: Terri Parker, Kathleen
Underwood, Tiffany Meuer, Dave
Milligan, Troy Christensen, Janine
Plettner-Glodt, Erin Wagner

Date Submitted: 10/11/2011

State Status: Approved-Closed

Reviewer(s): Linda Bird

Disposition Date: 10/18/2011

Disposition Status: Approved-
Closed

Implementation Date:

Implementation Date Requested: On Approval

State Filing Description:

General Information

Project Name: SOV

Project Number: SOV

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Overall Rate Impact:

Deemer Date:

Submitted By: Tiffany Meuer

Filing Description:

NAIC #92738

FEIN 42-1153896

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 10/18/2011

State Status Changed: 10/18/2011

Created By: Tiffany Meuer

Corresponding Filing Tracking Number:

October 10, 2011

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
Filing Company: American Equity Investment Life Insurance Company State Tracking Number: 50003
Company Tracking Number: SOV
TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
Product Name: SOV
Project Name/Number: SOV/SOV

Re: Variability Changes

As a result of the current economic downturn we are seeking to adjust the previously approved variability ranges on any future policy contracts issued with American Equity Investment Life Insurance Company. Any policies already issued will not be affected by these changes. Additionally, these changes do not affect the minimum cash values that were previously provided in the original filings.

We are requesting approval for changes on the following previously approved form filings:

Form #: INDEX-1-07
Approved: 11-18-06
Tracking #: SERT-6URJEZ961

Form #: INDEX-2-09
Approved: 5-11-09
Tracking #: AMEQ-126134768

Form #: INDEX-4-07
Approved: 11-16-06
Tracking #: AMEQ-125032938

Form #: INDEX-5-07
Approved: 11-16-06
Tracking #: AMEQ-125032940

Form #: INDEX-6-05
Approved: 01-06-06
Tracking #: SERT-6KBLMY462

Form #: INDEX-6-07
Approved: 07-27-07
Tracking #: AMEQ-125236231

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
Company
Company Tracking Number: SOV
TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
Product Name: SOV
Project Name/Number: SOV/SOV

Form #: FPDA-7-08
Approved: 1-22-09
Tracking #: AMEQ-125985995

Form #: FPDA-10
Approved: 02-10-05
Tracking #: SERT-698RN6409

Form #: FRG-2-09
Approved: 6-16-09
Tracking #: AMEQ-126189456

Form #: SPDA-MYGA
Approved: 07-07-08
Tracking #: AMEQ-125721016

Form #: APT-PR
Approved: 09-22-05
Tracking #: SERT-6G8SKP559

Form #: MA-PR
Approved: 09-27-05
Tracking #: SERT-6G8SEJ266

We certify that the only items we are requesting to change and will be changed are the ranges to the statement of variability provided in this filing. If any other changes are needed we will notify your department. We appreciate your assistance on the review and approval of these changes.

Sincerely,

Marla G. Lacey

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
 Company
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

Vice President, Chief Compliance Officer & Associate General Counsel

Company and Contact

Filing Contact Information

Troy Christensen, AVP Compliance Counsel tchristensen@american-equity.com
 6000 Westown Pkwy 515-457-1863 [Phone]
 West Des Moines, IA 50266

Filing Company Information

American Equity Investment Life Insurance CoCode: 92738 State of Domicile: Iowa
 Company
 6000 Westown Pkwy Group Code: 2658 Company Type:
 West Des Moines, IA 50266 Group Name: State ID Number:
 (515) 221-0002 ext. [Phone] FEIN Number: 42-1153896

Filing Fees

Fee Required? Yes
 Fee Amount: \$600.00
 Retaliatory? No
 Fee Explanation: 12 FORMS X \$50
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
American Equity Investment Life Insurance Company	\$600.00	10/11/2011	52690890

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
 Company
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved- Closed	Linda Bird	10/18/2011	10/18/2011

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Linda Bird	10/17/2011	10/17/2011	Tiffany Meuer	10/17/2011	10/17/2011

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
Company
Company Tracking Number: SOV
TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
Product Name: SOV
Project Name/Number: SOV/SOV

Disposition

Disposition Date: 10/18/2011

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
 Company
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		Yes
Supporting Document	Application		Yes
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	COVER LETTER		Yes
Form (revised)	INDEX-1-07		Yes
Form	INDEX-1-07	Replaced	Yes
Form (revised)	INDEX-5-07		Yes
Form	INDEX-5-07	Replaced	Yes
Form (revised)	INDEX-2-09		Yes
Form	INDEX-2-09	Replaced	Yes
Form (revised)	APT-PR		Yes
Form	APT-PR	Replaced	Yes
Form (revised)	MA-PR		Yes
Form	MA-PR	Replaced	Yes
Form (revised)	INDEX-4-07		Yes
Form	INDEX-4-07	Replaced	Yes
Form (revised)	INDEX-6-05		Yes
Form	INDEX-6-05	Replaced	Yes
Form (revised)	INDEX-6-07		Yes
Form	INDEX-6-07	Replaced	Yes
Form (revised)	FPDA-7-08		Yes
Form	FPDA-7-08	Replaced	Yes
Form (revised)	FPDA-10		Yes
Form	FPDA-10	Replaced	Yes
Form (revised)	FRG-2-09		Yes
Form	FRG-2-09	Replaced	Yes
Form (revised)	SPDA-MYGA		Yes
Form	SPDA-MYGA	Replaced	Yes

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
Company
Company Tracking Number: SOV
TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
Product Name: SOV
Project Name/Number: SOV/SOV

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 10/17/2011
Submitted Date 10/17/2011
Respond By Date 11/17/2011

Dear Troy Christensen,

This will acknowledge receipt of the captioned filing.

Objection 1

Comment: Values that are not guaranteed for the life of the contract must have guaranteed maximum and minimum guaranteed values. The range from 1% to unlimited is not in compliance with Arkansas contract guidelines. The range "to unlimited" on the statements of variability will need to be revised in order to comply.

A.C.A. 23-79-109(1)-(5) sets forth the procedure by which filings may be deemed approved upon the expiration of certain time periods with no affirmative action by the commissioner. If the commissioner determines that additional information is needed to make a decision regarding approval, such request for information will be made to the company. The filing will not be considered complete until said additional information is received. The time periods set forth in this statute will not begin to run until the filing is complete.

Please feel free to contact me if you have questions.

Sincerely,
Linda Bird

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
 Company
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

Response Letter

Response Letter Status Submitted to State
 Response Letter Date 10/17/2011
 Submitted Date 10/17/2011

Dear Linda Bird,

Comments:

Response 1

Comments: Revised statement of variability for each form has been revised on the form schedule. Please let us know if you do have any further questions on this filing. Thank you for your help.

Related Objection 1

Comment:

Values that are not guaranteed for the life of the contract must have guaranteed maximum and minimum guaranteed values. The range from 1% to unlimited is not in compliance with Arkansas contract guidelines. The range "to unlimited" on the statements of variability will need to be revised in order to comply.

Changed Items:

No Supporting Documents changed.

Form Schedule Item Changes

Form Name	Form Number	Edition Date	Form Type	Action	Action Specific Data	Readability Score	Attach Document
INDEX-1-07	INDEX-1-07		Other	Other	VARIABILITY CHANGE ONLY		AR stmtVariability1-07.pdf
Previous Version							
INDEX-1-07	INDEX-1-07		Other	Other	VARIABILITY CHANGE		stmtVariability1-07.pdf

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance Company State Tracking Number: 50003
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

INDEX-5-07 INDEX-5-07 Other Other ONLY VARIABILITY CHANGE ONLY ARstmtVariability5-07.pdf

Previous Version

INDEX-5-07 INDEX-5-07 Other Other VARIABILITY CHANGE ONLY stmtVariability5-07.pdf

INDEX-2-09 INDEX-2-09 Other Other VARIABILITY CHANGE ONLY ARstmtofVariability2-09.pdf

Previous Version

INDEX-2-09 INDEX-2-09 Other Other VARIABILITY CHANGE ONLY stmtofVariability2-09.pdf

APT-PR APT-PR Other Other VARIABILITY CHANGE ONLY ARstmtVariabilityAPT-PR.pdf

Previous Version

APT-PR APT-PR Other Other VARIABILITY CHANGE ONLY stmtVariabilityAPT-PR.pdf

MA-PR MA-PR Other Other VARIABILITY CHANGE ONLY ARstmtVariabilityMA-PR.pdf

Previous Version

MA-PR MA-PR Other Other VARIABILITY stmtVariabilityMA-

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance Company State Tracking Number: 50003
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

INDEX-4-07 INDEX-4-07 Other Other CHANGE ONLY PR.pdf
 VARIABILITY CHANGE ONLY ARstmtVariability4-07.pdf

Previous Version

INDEX-4-07 INDEX-4-07 Other Other VARIABILITY CHANGE ONLY stmtVariability4-07.pdf

INDEX-6-05 INDEX-6-05 Other Other VARIABILITY CHANGE ONLY ARstmtVariability6-05.pdf

Previous Version

INDEX-6-05 INDEX-6-05 Other Other VARIABILITY CHANGE ONLY stmtVariability6-05.pdf

INDEX-6-07 INDEX-6-07 Other Other VARIABILITY CHANGE ONLY ARstmtofVariability6-07.pdf

Previous Version

INDEX-6-07 INDEX-6-07 Other Other VARIABILITY CHANGE ONLY stmtofVariability6-07.pdf

FPDA-7-08 FPDA-7-08 Other Other VARIABILITY CHANGE ONLY ARstmtofVariability7-08.pdf

Previous Version

FPDA-7-08 FPDA-7- Other Other VARIABILITY stmtofVari

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
 Company
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

08 TY
 CHANGE
 ONLY ability7-
 08.pdf

FPDA-10 FPDA-10 Other Other VARIABIL
 TY
 CHANGE ARstmtofV
 ariabilityF-
 10.pdf
 ONLY

Previous Version
 FPDA-10 FPDA-10 Other Other VARIABIL
 TY
 CHANGE stmtofVari
 abilityF-
 10.pdf
 ONLY

FRG-2-09 FRG-2-09 Other Other VARIABIL
 TY
 CHANGE ARstmtofV
 ariabilityF
 RG-2-
 09.pdf
 ONLY

Previous Version
 FRG-2-09 FRG-2-09 Other Other VARIABIL
 TY
 CHANGE stmtofVari
 abilityFRG
 -2-09.pdf
 ONLY

SPDA-MYGA SPDA-
 MYGA Other Other VARIABIL
 TY
 CHANGE ARstmtofV
 ariabilityS
 PDA-
 MYGA.pdf
 ONLY

Previous Version
 SPDA-MYGA SPDA-
 MYGA Other Other VARIABIL
 TY
 CHANGE stmtofVari
 abilitySPD
 A-
 MYGA.pdf
 ONLY

No Rate/Rule Schedule items changed.

Sincerely,

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance Company State Tracking Number: 50003
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

Form Schedule

Lead Form Number: SOV

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	INDEX-1-07	Other	INDEX-1-07	Other	Other Explanation: VARIABILITY CHANGE ONLY		AR stmtVariability 1-07.pdf
	INDEX-5-07	Other	INDEX-5-07	Other	Other Explanation: VARIABILITY CHANGE ONLY		ARstmtVariability5-07.pdf
	INDEX-2-09	Other	INDEX-2-09	Other	Other Explanation: VARIABILITY CHANGE ONLY		ARstmtofVariability2-09.pdf
	APT-PR	Other	APT-PR	Other	Other Explanation: VARIABILITY CHANGE ONLY		ARstmtVariabilityAPT-PR.pdf
	MA-PR	Other	MA-PR	Other	Other Explanation: VARIABILITY CHANGE ONLY		ARstmtVariabilityMA-PR.pdf
	INDEX-4-07	Other	INDEX-4-07	Other	Other Explanation: VARIABILITY CHANGE ONLY		ARstmtVariability4-07.pdf
	INDEX-6-05	Other	INDEX-6-05	Other	Other Explanation: VARIABILITY CHANGE ONLY		ARstmtVariability6-05.pdf
	INDEX-6-07	Other	INDEX-6-07	Other	Other Explanation: VARIABILITY CHANGE ONLY		ARstmtofVariability6-07.pdf
	FPDA-7-08	Other	FPDA-7-08	Other	Other Explanation: VARIABILITY CHANGE ONLY		ARstmtofVariability7-08.pdf
	FPDA-10	Other	FPDA-10	Other	Other Explanation:		ARstmtofVari

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
 Company
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

				VARIABILITY	abilityF-10.pdf
				CHANGE ONLY	
FRG-2-09	Other	FRG-2-09	Other	Other Explanation:	ARstmtofVari
				VARIABILITY	abilityFRG-2-
				CHANGE ONLY	09.pdf
SPDA-	Other	SPDA-MYGA	Other	Other Explanation:	ARstmtofVari
MYGA				VARIABILITY	abilitySPDA-
				CHANGE ONLY	MYGA.pdf

STATEMENT OF VARIABILITY

INDEX-1-07

I certify only items within brackets on pages 1, 3; 3a and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 11 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

12. **Minimum Guaranteed Interest Rate:** Range of 1-3%. At issue of each new contract, guaranteed for the life of contract and is based on the 2 month average of the 5 year Constant Maturity Treasury Rate in October of the previous year.
13. **Fixed Value Initial Premium:** Is allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.
14. **Fixed Value Guaranteed Initial Interest Rate:** Range of 1% to 3% and is at issue of each new contract, based on current declared interest rate for guarantee period.

Page 3a

15. **Guaranteed Minimum Cap:** Range of 1-4% based on market conditions.

S&P Averaged Value Specifications

16. **Index:** Index to which these Index Credits are currently linked.
17. **Initial Premium:** Provided at the time of the application.
18. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
19. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract.
20. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

S&P Point to Point Value Specifications

21. **Index:** Index to which these Index Credits are currently linked.
22. **Initial Premium:** Provided at the time of the application.
23. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
24. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract
25. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Point to Point Value Specifications

26. **Index:** Index to which these Index Credits are currently linked.
27. **Initial Premium:** Provided at the time of the application.
28. **Index on Contract Date:** At issue of each new contract, based on DJIA on the Contract Date.

29. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract.
30. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Averaged Value Specifications

31. **Index:** Index to which these Index Credits are currently linked.
32. **Initial Premium:** Provided at the time of the application.
33. **Index on Contract Date:** At issue of each new contract, based on DJIA on the Contract Date.
34. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract.
35. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

Bond Value Specifications

36. **Index:** Index to which these Index Credits are currently linked.
37. **Initial Premium:** Provided at the time of the application.
38. **Index on Contract Date:** At issue of each new contract, based on Lehman Brothers U. S. Aggregate on the Contract Date.
39. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract.
40. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

INDEX-5-07

I certify only items within brackets on page 3 and 3a are variable. They will vary as follows:

Items 1 through 7 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

8. Total Initial Premium: at issue of each new contract, based on premium paid with limits ranging from a minimum of \$5,000 to a maximum of \$1,000,000 that varies by age as follows:

Maximum premium - issue ages	0-69	\$1,000,000
	70-79	500,000
	80-85	250,000

9. Planned Premium Mode: At issue of each new contract, based on stated mode in application, and can be monthly, quarterly, semi-annually or annually.
10. Planned Premium Amount At issue of each new contract, based on amount designated on application.
11. Minimum Guaranteed Interest Rate: Range of 1-3% and is at issue of each new contract, guaranteed for the life of contract and is based on the 2 month average of the 5 year Constant Maturity Treasury Rate in October and November of the previous year.
12. Fixed Value Initial Premium: Allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.

Premium Allocations: Owner sets at issue and may adjust on anniversaries. Minimum to select a value at issue is \$1,000. We will accept additional premiums (AP) between anniversaries and hold them in the FV to earn Interest at current rates until the next anniversary, when Owner may elect to transfer money between values. If no direction is given the premiums plus interest accumulated will stay in the FV. Transfers are subject to a \$1,000 minimum to maintain a value and 10% of CV to enter a new Value.

13. Fixed Value Guaranteed Initial Interest Rate: Range of 1% to 3% and is at issue of each new contract, based on current declared interest rate.
14. Guaranteed Minimum Cap: Range of 1-4% and varies on market conditions.

S&P Averaged Value Specifications

15. Initial Premium: Provided at the time of the application.
16. Index on Contract Date: At issue of each new contract, based on S&P 500 on the Contract Date.
17. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
18. Initial Cap: Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year.

S&P Point to Point Value Specifications

18. Initial Premium: Provided at the time of the application.
19. Index on Contract Date: At issue of each new contract, based on S&P 500 on the Contract Date.
20. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
21. Initial Cap: Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Point to Point Value Specifications

22. Initial Premium: Provided at the time of the application.
23. Index on Contract Date: At issue of each new contract, based on DJIA on the Contract Date.
24. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
25. Initial Cap: Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Averaged Value Specifications

26. Initial Premium: Provided at the time of the application.
27. Index on Contract Date: At issue of each new contract, based on DJIA on the Contract Date.
28. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
29. Initial Cap: Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year.

Bond Value Specifications

30. Initial Premium: Provided at the time of the application.
31. Index on Contract Date: At issue of each new contract, based on Lehman Brothers U. S. Aggregate on the Contract Date.
32. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
33. Initial Cap: Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year.

If we change anything else, we will file it with your department before use.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

INDEX-2-09

I certify only items within brackets on page 3, 3a and the signatures on page 1 are variable. They will vary as follows:

Page 1

Signatures are variable and will change only as officers' change.

Page 3

Items 1 through 8, 10, 11, 12 and 13 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

9. **Bonus:** Contract form Index-2-09 is a flexible premium deferred indexed annuity contract, with a bonus on all premiums received in the first contract year of [8% to 12%] for issue ages [0 to 78] and [3% to 7%] for issue ages [66 to 85]. We intend to have one bonus available up to a specified issue age and a reduced bonus for issue ages above that age.

We are filing issue age ranges and bonus percentage ranges as variable to allow for flexibility as market conditions change. We guarantee all contracts issued on any specified date will have the same issue age ranges and bonuses and will vary only as market conditions demand.

14. **Minimum Guaranteed Interest Rate:** MGIR is set at issue, based on the average of five years Constant Maturity Treasury Rate for October 2008, and guaranteed for the Guarantee Period. (1% - 3%)

Fixed Value Specifications

15. **Fixed Value Initial Premium:** Based on amount of Initial Premium and applicant's allocation of Initial Premium as shown on Disclosure.
16. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure.
17. **Fixed Value Guaranteed Initial Interest Rate:** Range 1% to 12%, based on market conditions as directed by management.

Page 3a

S&P Averaged Value Specifications

19. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
20. **Initial Premium:** Amount received at application.
21. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
22. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
23. **Initial Cap:** 1% to unlimited and varies on market conditions.
24. **Guaranteed Minimum Cap:** 1-4% and varied on market conditions.

S&P Point to Point Value Specifications-Cap

25. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
26. **Initial Premium:** Amount received at application.
27. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
28. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
29. **Initial Cap:** 1% to 20% and varies on market conditions.
30. **Guaranteed Minimum Cap:** 1-4% and varied on market conditions.

S & P Averaged Value Specifications – PR

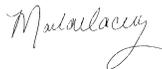
29. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
30. **Initial Premium:** Amount received at application.
31. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
32. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
33. **Initial Participation Rate:** 10-100% and varies on market conditions.
34. **Guaranteed Minimum Participation Rate:** 10-25% and varies on market conditions.

S&P Point to Point Value Specifications-PR

35. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
36. **Initial Premium:** Amount received at application.
37. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
38. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
39. **Initial Participation Rate:** 10-100% and varies on market conditions.
40. **Guaranteed Minimum Participation Rate:** 10-25% and varies on market conditions.

Monthly point to Point (MPT) Value Specifications

39. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
40. **Initial Premium:** Amount received at application.
41. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
42. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
43. **Asset Fee Rate:** (0% - 2%)
44. **MPT Cap:** (1% - 6%)



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY APT-PR

I certify that only the items within brackets are variable. They will vary as follows:

Base Contract Number:	At issue of each new contract.
APT-PR Index:	At issue of each new contract.
APT-PR Index on Contract Date	At issue of each new contract.
APT-PR Initial Premium:	At issue of each new contract, based On premium paid.
APT-PR Participation Rate	At issue of each new contract, guaranteed for one contract year with a range of 10% to 100%
APT-PR Guaranteed Minimum PR:	At issue of each new contract, guaranteed for one contract year with a range of 10% to 25%.

Nothing else within this rider is variable. If we change anything else, we will file it with your department before use.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel

October 10, 2011
Date

STATEMENT OF VARIABILITY MA-PR

I certify that only the items within brackets are variable. They will vary as follows:

Base Contract Number:	At issue of each new contract.
MA-PR Index :	At issue of each new contract.
MA-PR Index on Contract Date:	At issue of each new contract.
MA-PR Initial Premium:	At issue of each new contract, based on premium paid.
MA-PR Participation Rate:	At issue of each new contract, guaranteed for one contract year with a range of 10% to 100%.
MA-PR Guaranteed Minimum PR:	At issue of each new contract, guaranteed for one contract year with a range of 10% to 25%.

Nothing else within this rider is variable. If we change anything else, we will file it with your department before use.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel

October 10, 2011
Date

STATEMENT OF VARIABILITY

INDEX-4-07

I certify only items within brackets on pages 1, 3, 3a and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 10 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

11. **Minimum Guaranteed Interest Rate:** Range of 1-3% and is at issue of each new contract, guaranteed for the life of contract and is based on the average of the 5 year Constant Maturity Treasury Rate in October of the previous year.
12. **Fixed Value Initial Premium:** Allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.
13. **Fixed Value Guaranteed Initial Interest Rate:** Range of 1%-3% and is at issue of each new contract, based on current declared interest rate.

Page 3a

14. **Guaranteed Minimum Cap:** 1-4% range and varies on market condition.

S&P Averaged Value Specifications

15. **Index:** Index to which these Index Credits are currently linked.
16. **Initial Premium:** Provided at the time of application.
17. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
18. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
19. **Initial Cap:** Range of 1%-20% and is at issue of each new contract, guaranteed for 1 Contract Year.

S&P Point to Point Value Specifications

19. **Index:** Index to which these Index Credits are currently linked.
20. **Initial Premium:** Provided at the time of application.
21. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
22. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
23. **Initial Cap:** Range of 1%-20% and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Averaged Value Specifications

24. **Index:** Index to which these Index Credits are currently linked.
25. **Initial Premium:** Provided at the time of application.

26. **Index on Contract Date:** At issue of each new contract, based on DJIA on the Contract Date.
27. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
28. **Initial Cap:** Range of 1%-20% and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Point to Point Value Specifications

29. **Index:** Index to which these Index Credits are currently linked. See #14
30. **Initial Premium:** Provided at the time of application.
31. **Index on Contract Date:** At issue of each new contract, based on DJIA on the Contract Date.
32. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
33. **Initial Cap:** Range of 1%-20% and is at issue of each new contract, guaranteed for 1 Contract Year.

Bond Value Specifications

34. **Index:** Index to which these Index Credits are currently linked.
35. **Initial Premium:** Provided at the time of application.
36. **Index on Contract Date:** At issue of each new contract, based on Lehman Brothers U. S. Aggregate on the Contract Date.
37. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
38. **Initial Cap:** Range of 1%-20% and is at issue of each new contract, guaranteed for 1 Contract Year.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

INDEX-6-05

I certify only items within brackets on pages 1, 3, 3a and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 10 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

11. **Minimum Guaranteed Interest Rate:** Range of 1-3% and is at issue of each new contract.
12. **Fixed Value Initial Premium:** Is allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.
13. **Initial Fixed Value Interest Rate:** Range of 1% to 20% and is at issue of each new contract, based on current declared interest rate.

Page 3a

14. **Guaranteed Minimum P.R.:** Range of 10-25% and varies on market conditions.
15. **Guaranteed Minimum Cap Rate:** Range of 1-4% and varies on market conditions.

Averaged Value

16. **Index:** Index to which these Index Credits are currently linked.
17. **Initial Premium:** Provided at time of application.
18. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
19. **Initial Participation Rate:** Range of 10% to 60% and is at issue of each new contract, guaranteed for 1 Contract Year.

Point to Point Value

20. **Index:** Index to which these Index Credits are currently linked.
21. **Initial Premium:** Provided at time of application.
22. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
23. **Initial Participation Rate:** Range of 10% to 60% and is at issue of each new contract, guaranteed for 1 Contract Year.

Bond Value

24. **Index:** Index to which these Index Credits are currently linked.
25. **Initial Premium:** Provided at time of application.
26. **Index on Contract Date:** At issue of each new contract, based on Lehman Brothers U. S. Treasury Index on the Contract Date.
27. **Initial Cap:** Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

INDEX-6-07

I certify only items within brackets on pages 1, 3; 3a and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 11, 13 and 14 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

12. **Minimum Guaranteed Surrender Value (MGSV) Percentage:** At issue of each new contract, based on Premium Bonus Percentage.
15. **Minimum Guaranteed Interest Rate (MGIR):** Range of 1-3% and is at issue of each new contract, guaranteed for the life of contract and is based on the average of the 5 year Constant Maturity Treasury Rate in October of the previous year.
16. **Fixed Value Initial Premium:** Allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.
17. **Fixed Value Initial Interest Rate:** Range of 1% to 20% and varies on market conditions.

Page 3a

18. **Guaranteed Minimum PR:** Range of 10-25% based on market conditions.

Averaged Value with Cap

19. **Index:** Index to which these Index Credits are currently linked.
20. **Initial Premium:** Provided at time of application.
21. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
22. **Initial Cap:** Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year.

Averaged Value with Participation Rate

23. **Index:** Index to which these Index Credits are currently linked.
24. **Initial Premium:** Provided at time of application.
25. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
26. **Initial Participation Rate:** Range of 10% to 60% and is at issue of each new contract, guaranteed for 1 Contract Year.

Point to Point Value with Cap

27. **Index:** Index to which these Index Credits are currently linked.
28. **Initial Premium:** Provided at time of application.
29. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
30. **Initial Cap:** Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year.

Point to Point Value with Participation Rate

- 31. **Index:** Index to which these Index Credits are currently linked.
- 32. **Initial Premium:** Provided at time of application.
- 33. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
- 34. **Initial Participation Rate:** Range of 10% to 60% and is at issue of each new contract, guaranteed for 1 Contract Year

Bond Value

- 35. **Index:** Index to which these Index Credits are currently linked.
- 36. **Initial Premium:** Provided at time of application.
- 37. **Index on Contract Date:** At issue of each new contract, based on Lehman Brothers U. S. Aggregate on the Contract Date.
- 38. **Initial Cap:** Range of 1% to 20% and is at issue of each new contract, guaranteed for 1 Contract Year

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

FPDA-7-08

I certify only items within brackets on page 3, 3A and the signatures on page 1 are variable. They will vary as follows:

Page 1

Signatures are variable.

Page 3 and 3A

Items 1 through 8, 10 and 11 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

9. **Initial Bonus:** Initial dollar amount varies based on amount of Initial Premium.
12. **Guaranteed Initial Interest Rate:** Range of 2% to 100%. We declare our current interest rate in advance and guarantee never less than MGIR-CV, for one contract year.
13. **Minimum Guaranteed Interest Rate:** Range of 1-3%. MGIR applies only to Minimum Guaranteed Surrender Value (MGSV), is set at issue, based on the average of five year Constant Maturity Treasury Rate for October 2008, and guaranteed for the MGIR-MGSV Guarantee Period.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

FPDA-10

I certify only items within brackets on pages 1, 3 and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 11 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

12. **Guaranteed Initial Interest Rate:** Range of 1% to 100%. We declare our current interest rate in advance and is guaranteed for the Initial Interest Rate Guarantee Period.

13. **Minimum Guaranteed Interest Rate:** At issue of each new contract with a range of 1% to 3%.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

FRG-02-09

I certify only items within brackets on page 3 and the signatures on page 1 are variable. They will vary as follows:

Page 1

Signatures are variable.

Page 3

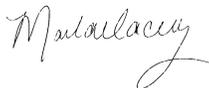
Items 1 through 11, 13 and 14 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

12. **Bonus:** Contract form FRG-2-09 is a flexible premium deferred indexed annuity contract, with a bonus on all premiums received in the first contract year of [8% to 12%] for issue ages [0 to 78] and [3% to 7%] for issue ages [66 to 85]. We intend to have one bonus available up to a specified issue age and a reduced bonus for issue ages above that age.

We are filing issue age ranges and bonus percentage ranges as variable to allow for flexibility as market conditions change. We guarantee all contracts issued on any specified date will have the same issue age ranges and bonuses and will vary only as market conditions demand.

The applicant is informed of the bonus, its provisions and limitations on pages 3 and 6 of the contract, as well as in the disclosure required at application signing

15. **Guaranteed Initial Interest Rate:** The Guaranteed Initial Interest Rate can vary from 2% to 100%, applies only to first year premium as described on page 7, set at issue and guaranteed for first contract year as shown on page 3.
16. **Minimum Guaranteed Interest Rate-MGSV:** The Minimum Guaranteed Interest Rate MGIR-CV will be 1-3%. MGIR-MGSV set at issue based on the average of the 5 yr constant maturity treasury rate for October of the previous year, as described on page 7, and guaranteed for the life of the contract.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

SPDA-MYGA

I certify only items within brackets on pages 1, 3, and back cover are variable. They will vary as follows:

Page 1

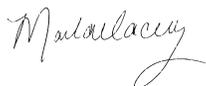
Address and phone number will change only if we move, we will notify current contract holders.
Signatures are variable and will change only as officer's change.

Page 3, items 1 through 9 are self-explanatory based on the specifics of the applicant as provided in the application.

10. **Initial Guaranteed Interest Rate:** Range of 1% to 100%. We declare our current interest rate in advance and are guaranteed for the Initial Interest Rate Guarantee Period.
11. **Initial Guarantee Period:** Eight Guarantee Periods, with eight corresponding MGIR and Surrender Charges. Applicant chooses at application.
12. **Minimum Guaranteed Interest Rate:** Range of 1-3%. MGIR is set at issue, based on the average of five year Constant Maturity Treasury Rate for October of the previous year, and guaranteed for the Guarantee Period.
13. **Initial Surrender Charge Period:** [3-10] Contract years.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
 Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
 Company
 Company Tracking Number: SOV
 TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
 Product Name: SOV
 Project Name/Number: SOV/SOV

Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Flesch Certification		
Comments:		
Attachment: AR111011-AR1.pdf		

	Item Status:	Status Date:
Satisfied - Item: Application		
Comments: Application Form 2000 (Rev) Approved on March 10, 2000		

	Item Status:	Status Date:
Satisfied - Item: Life & Annuity - Acturial Memo		
Comments: N/A-Variable change only and doesn't affect minimum cash values provided in original filings.		

	Item Status:	Status Date:
Satisfied - Item: COVER LETTER		
Comments:		
Attachment: AR111010.pdf		

CERTIFICATION

TO: ARKANSAS INSURANCE DEPARTMENT

FROM: AMERICAN EQUITY INVESTMENT LIFE INSURANCE COMPANY

Forms:

INDEX-1-07 Score of 50.2
INDEX-5-07 Score of 48.2
INDEX-2-09 Score of 50.0
APT-PR Score of 53.8
MA-PR Score of 52.7
INDEX-4-07 Score of 48.2
INDEX-6-05 Score of 50.6
INDEX-6-07 Score of 50.0
FPDA-7-08 Score of 50.0
FPDA-10 Score of 49.8
FRG-2-09 Score of 51.0
SPDA-MYGA Score of 50.0

This is to certify that the attached Forms achieve a Flesch Reading Ease Test Score, as indicated above,, and complies with the requirements of Ark. Stat. Ann. 23-80-201 through 23-80-308, cited as the Life and Disability Insurance Policy Language Simplification Act.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel

October 11, 2011
Date

AR1



Marla G. Lacey, J.D.
Vice President, Chief Compliance Officer & Associate General Counsel

NAIC #92738
FEIN 42-1153896

October 10, 2011

Re: Variability Changes

As a result of the current economic downturn we are seeking to adjust the previously approved variability ranges on any future policy contracts issued with American Equity Investment Life Insurance Company. Any policies already issued will not be affected by these changes. Additionally, these changes do not affect the minimum cash values that were previously provided in the original filings.

We are requesting approval for changes on the following previously approved form filings:

Form #: INDEX-1-07
Approved: 11-18-06
Tracking #: SERT-6URJEZ961

Form #: INDEX-2-09
Approved: 5-11-09
Tracking #: AMEQ-126134768

Form #: INDEX-4-07
Approved: 11-16-06
Tracking #: AMEQ-125032938

Form #: INDEX-5-07
Approved: 11-16-06
Tracking #: AMEQ-125032940

Form #: INDEX-6-05
Approved: 01-06-06
Tracking #: SERT-6KBLMY462

Form #: INDEX-6-07
Approved: 07-27-07
Tracking #: AMEQ-125236231

Marla G. Lacey, J.D.
Vice President, Chief Compliance Officer & Associate General Counsel

Form #: **FPDA-7-08**
Approved: 1-22-09
Tracking #: AMEQ-125985995

Form #: **FPDA-10**
Approved: 02-10-05
Tracking #: SERT-698RN6409

Form #: **FRG-2-09**
Approved: 6-16-09
Tracking #: AMEQ-126189456

Form #: **SPDA-MYGA**
Approved: 07-07-08
Tracking #: AMEQ-125721016

Form #: **APT-PR**
Approved: 09-22-05
Tracking #: SERT-6G8SKP559

Form #: **MA-PR**
Approved: 09-27-05
Tracking #: SERT-6G8SEJ266

We certify that the only items we are requesting to change and will be changed are the ranges to the statement of variability provided in this filing. If any other changes are needed we will notify your department. We appreciate your assistance on the review and approval of these changes.

Sincerely,



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel

<i>SERFF Tracking Number:</i>	AMEQ-127704192	<i>State:</i>	Arkansas
<i>Filing Company:</i>	American Equity Investment Life Insurance Company	<i>State Tracking Number:</i>	50003
<i>Company Tracking Number:</i>	SOV		
<i>TOI:</i>	A10 Annuities - Other	<i>Sub-TOI:</i>	A10.000 Annuities - Other
<i>Product Name:</i>	SOV		
<i>Project Name/Number:</i>	SOV/SOV		

Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date:	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
10/11/2011	Form	INDEX-5-07	10/17/2011	stmtVariability5-07.pdf (Superseded)
10/11/2011	Form	INDEX-2-09	10/17/2011	stmtofVariability2-09.pdf (Superseded)
10/11/2011	Form	APT-PR	10/17/2011	stmtVariabilityAPT-PR.pdf (Superseded)
10/11/2011	Form	MA-PR	10/17/2011	stmtVariabilityMA-PR.pdf (Superseded)
10/11/2011	Form	INDEX-4-07	10/17/2011	stmtVariability4-07.pdf (Superseded)
10/11/2011	Form	INDEX-6-05	10/17/2011	stmtVariability6-05.pdf (Superseded)
10/11/2011	Form	INDEX-6-07	10/17/2011	stmtofVariability6-07.pdf (Superseded)
10/11/2011	Form	FPDA-7-08	10/17/2011	stmtofVariability7-08.pdf (Superseded)
10/11/2011	Form	FPDA-10	10/17/2011	stmtofVariabilityF-10.pdf (Superseded)

SERFF Tracking Number: AMEQ-127704192 State: Arkansas
Filing Company: American Equity Investment Life Insurance State Tracking Number: 50003
Company
Company Tracking Number: SOV
TOI: A10 Annuities - Other Sub-TOI: A10.000 Annuities - Other
Product Name: SOV
Project Name/Number: SOV/SOV

10/11/2011	Form	FRG-2-09	10/17/2011	stmtofVariabilityFRG-2-09.pdf (Superceded)
10/11/2011	Form	SPDA-MYGA	10/17/2011	stmtofVariabilitySPDA- MYGA.pdf (Superceded)
10/11/2011	Form	INDEX-1-07	10/17/2011	stmtVariability1-07.pdf (Superceded)

STATEMENT OF VARIABILITY

INDEX-5-07

I certify only items within brackets on page 3 and 3a are variable. They will vary as follows:

Items 1 through 7 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

8. Total Initial Premium: at issue of each new contract, based on premium paid with limits ranging from a minimum of \$5,000 to a maximum of \$1,000,000 that varies by age as follows:

Maximum premium - issue ages	0-69	\$1,000,000
	70-79	500,000
	80-85	250,000

9. Planned Premium Mode: At issue of each new contract, based on stated mode in application, and can be monthly, quarterly, semi-annually or annually.
10. Planned Premium Amount At issue of each new contract, based on amount designated on application.
11. Minimum Guaranteed Interest Rate: Range of 1-3% and is at issue of each new contract, guaranteed for the life of contract and is based on the 2 month average of the 5 year Constant Maturity Treasury Rate in October and November of the previous year.
12. Fixed Value Initial Premium: Allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.

Premium Allocations: Owner sets at issue and may adjust on anniversaries. Minimum to select a value at issue is \$1,000. We will accept additional premiums (AP) between anniversaries and hold them in the FV to earn Interest at current rates until the next anniversary, when Owner may elect to transfer money between values. If no direction is given the premiums plus interest accumulated will stay in the FV. Transfers are subject to a \$1,000 minimum to maintain a value and 10% of CV to enter a new Value.

13. Fixed Value Guaranteed Initial Interest Rate: Range of 1% to unlimited and is at issue of each new contract, based on current declared interest rate.
14. Guaranteed Minimum Cap: Range of 1-4% and varies on market conditions.

S&P Averaged Value Specifications

15. Initial Premium: Provided at the time of the application.
16. Index on Contract Date: At issue of each new contract, based on S&P 500 on the Contract Date.
17. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
18. Initial Cap: Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

S&P Point to Point Value Specifications

18. Initial Premium: Provided at the time of the application.
19. Index on Contract Date: At issue of each new contract, based on S&P 500 on the Contract Date.
20. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
21. Initial Cap: Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Point to Point Value Specifications

22. Initial Premium: Provided at the time of the application.
23. Index on Contract Date: At issue of each new contract, based on DJIA on the Contract Date.
24. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
25. Initial Cap: Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

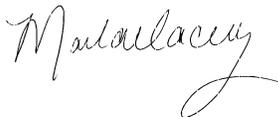
DJIA Averaged Value Specifications

26. Initial Premium: Provided at the time of the application.
27. Index on Contract Date: At issue of each new contract, based on DJIA on the Contract Date.
28. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
29. Initial Cap: Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Bond Value Specifications

30. Initial Premium: Provided at the time of the application.
31. Index on Contract Date: At issue of each new contract, based on Lehman Brothers U. S. Aggregate on the Contract Date.
32. Asset Fee Rate: Range of 0-3% and is set at issue of each new contract, and guaranteed for life of Contract.
33. Initial Cap: Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

If we change anything else, we will file it with your department before use.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

INDEX-2-09

I certify only items within brackets on page 3, 3a and the signatures on page 1 are variable. They will vary as follows:

Page 1

Signatures are variable and will change only as officers' change.

Page 3

Items 1 through 8, 10, 11, 12 and 13 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

9. **Bonus:** Contract form Index-2-09 is a flexible premium deferred indexed annuity contract, with a bonus on all premiums received in the first contract year of [8% to 12%] for issue ages [0 to 78] and [3% to 7%] for issue ages [66 to 85]. We intend to have one bonus available up to a specified issue age and a reduced bonus for issue ages above that age.

We are filing issue age ranges and bonus percentage ranges as variable to allow for flexibility as market conditions change. We guarantee all contracts issued on any specified date will have the same issue age ranges and bonuses and will vary only as market conditions demand.

14. **Minimum Guaranteed Interest Rate:** MGIR is set at issue, based on the average of five years Constant Maturity Treasury Rate for October 2008, and guaranteed for the Guarantee Period. (1% - 3%)

Fixed Value Specifications

15. **Fixed Value Initial Premium:** Based on amount of Initial Premium and applicant's allocation of Initial Premium as shown on Disclosure.
16. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure.
17. **Fixed Value Guaranteed Initial Interest Rate:** Range 1% to 12%, based on market conditions as directed by management.

Page 3a

S&P Averaged Value Specifications

19. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
20. **Initial Premium:** Amount received at application.
21. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
22. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
23. **Initial Cap:** 1% to unlimited and varies on market conditions.
24. **Guaranteed Minimum Cap:** 1-4% and varied on market conditions.

S&P Point to Point Value Specifications-Cap

25. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
26. **Initial Premium:** Amount received at application.
27. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
28. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
29. **Initial Cap:** 1% to unlimited and varies on market conditions.
30. **Guaranteed Minimum Cap:** 1-4% and varied on market conditions.

S & P Averaged Value Specifications – PR

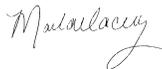
29. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
30. **Initial Premium:** Amount received at application.
31. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
32. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
33. **Initial Participation Rate:** 10-100% and varies on market conditions.
34. **Guaranteed Minimum Participation Rate:** 10-25% and varies on market conditions.

S&P Point to Point Value Specifications-PR

35. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
36. **Initial Premium:** Amount received at application.
37. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
38. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
39. **Initial Participation Rate:** 10-100% and varies on market conditions.
40. **Guaranteed Minimum Participation Rate:** 10-25% and varies on market conditions.

Monthly point to Point (MPT) Value Specifications

39. **Index:** currently S&P 500 or any suitable alternative Index should the S&P 500 no longer be available as described on Page 8.
40. **Initial Premium:** Amount received at application.
41. **Allocated Bonus:** Based on applicant's issue age, current bonus %, amount of Initial Premium, and allocation choices made by applicant on Disclosure
42. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
43. **Asset Fee Rate:** (0% - 2%)
44. **MPT Cap:** (1% - 6%)



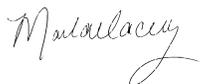
Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY APT-PR

I certify that only the items within brackets are variable. They will vary as follows:

Base Contract Number:	At issue of each new contract.
APT-PR Index:	At issue of each new contract.
APT-PR Index on Contract Date	At issue of each new contract.
APT-PR Initial Premium:	At issue of each new contract, based On premium paid.
APT-PR Participation Rate	At issue of each new contract, guaranteed for one contract year with a range of 10% to Unlimited
APT-PR Guaranteed Minimum PR:	At issue of each new contract, guaranteed for one contract year with a range of 10% to 25%.

Nothing else within this rider is variable. If we change anything else, we will file it with your department before use.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel

October 10, 2011
Date

STATEMENT OF VARIABILITY MA-PR

I certify that only the items within brackets are variable. They will vary as follows:

Base Contract Number:	At issue of each new contract.
MA-PR Index :	At issue of each new contract.
MA-PR Index on Contract Date:	At issue of each new contract.
MA-PR Initial Premium:	At issue of each new contract, based on premium paid.
MA-PR Participation Rate:	At issue of each new contract, guaranteed for one contract year with a range of 10% to Unlimited.
MA-PR Guaranteed Minimum PR:	At issue of each new contract, guaranteed for one contract year with a range of 10% to 25%.

Nothing else within this rider is variable. If we change anything else, we will file it with your department before use.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel

October 10, 2011
Date

STATEMENT OF VARIABILITY

INDEX-4-07

I certify only items within brackets on pages 1, 3, 3a and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 10 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

11. **Minimum Guaranteed Interest Rate:** Range of 1-3% and is at issue of each new contract, guaranteed for the life of contract and is based on the average of the 5 year Constant Maturity Treasury Rate in October of the previous year.
12. **Fixed Value Initial Premium:** Allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.
13. **Fixed Value Guaranteed Initial Interest Rate:** Range of 1%-unlimited and is at issue of each new contract, based on current declared interest rate.

Page 3a

14. **Guaranteed Minimum Cap:** 1-4% range and varies on market condition.

S&P Averaged Value Specifications

15. **Index:** Index to which these Index Credits are currently linked.
16. **Initial Premium:** Provided at the time of application.
17. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
18. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
19. **Initial Cap:** Range of 1%-unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

S&P Point to Point Value Specifications

19. **Index:** Index to which these Index Credits are currently linked.
20. **Initial Premium:** Provided at the time of application.
21. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
22. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
23. **Initial Cap:** Range of 1%-unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Averaged Value Specifications

24. **Index:** Index to which these Index Credits are currently linked.
25. **Initial Premium:** Provided at the time of application.

26. **Index on Contract Date:** At issue of each new contract, based on DJIA on the Contract Date.
27. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
28. **Initial Cap:** Range of 1%-unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Point to Point Value Specifications

29. **Index:** Index to which these Index Credits are currently linked. See #14
30. **Initial Premium:** Provided at the time of application.
31. **Index on Contract Date:** At issue of each new contract, based on DJIA on the Contract Date.
32. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
33. **Initial Cap:** Range of 1%-unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Bond Value Specifications

34. **Index:** Index to which these Index Credits are currently linked.
35. **Initial Premium:** Provided at the time of application.
36. **Index on Contract Date:** At issue of each new contract, based on Lehman Brothers U. S. Aggregate on the Contract Date.
37. **Asset Fee Rate:** Range of 0-4% and is set at issue of each new contract, and guaranteed for life of Contract.
38. **Initial Cap:** Range of 1%-unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

INDEX-6-05

I certify only items within brackets on pages 1, 3, 3a and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 10 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

11. **Minimum Guaranteed Interest Rate:** Range of 1-3% and is at issue of each new contract.
12. **Fixed Value Initial Premium:** Is allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.
13. **Initial Fixed Value Interest Rate:** Range of 1% to unlimited and is at issue of each new contract, based on current declared interest rate.

Page 3a

14. **Guaranteed Minimum P.R.:** Range of 10-25% and varies on market conditions.
15. **Guaranteed Minimum Cap Rate:** Range of 1-4% and varies on market conditions.

Averaged Value

16. **Index:** Index to which these Index Credits are currently linked.
17. **Initial Premium:** Provided at time of application.
18. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
19. **Initial Participation Rate:** Range of 10% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Point to Point Value

20. **Index:** Index to which these Index Credits are currently linked.
21. **Initial Premium:** Provided at time of application.
22. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
23. **Initial Participation Rate:** Range of 10% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Bond Value

24. **Index:** Index to which these Index Credits are currently linked.
25. **Initial Premium:** Provided at time of application.
26. **Index on Contract Date:** At issue of each new contract, based on Lehman Brothers U. S. Treasury Index on the Contract Date.
27. **Initial Cap:** Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

INDEX-6-07

I certify only items within brackets on pages 1, 3; 3a and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 11, 13 and 14 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

12. **Minimum Guaranteed Surrender Value (MGSV) Percentage:** At issue of each new contract, based on Premium Bonus Percentage.
15. **Minimum Guaranteed Interest Rate (MGIR):** Range of 1-3% and is at issue of each new contract, guaranteed for the life of contract and is based on the average of the 5 year Constant Maturity Treasury Rate in October of the previous year.
16. **Fixed Value Initial Premium:** Allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.
17. **Fixed Value Initial Interest Rate:** Range of 1% to 20% and varies on market conditions.

Page 3a

18. **Guaranteed Minimum PR:** Range of 10-25% based on market conditions.

Averaged Value with Cap

19. **Index:** Index to which these Index Credits are currently linked.
20. **Initial Premium:** Provided at time of application.
21. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
22. **Initial Cap:** Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Averaged Value with Participation Rate

23. **Index:** Index to which these Index Credits are currently linked.
24. **Initial Premium:** Provided at time of application.
25. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
26. **Initial Participation Rate:** Range of 10% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Point to Point Value with Cap

27. **Index:** Index to which these Index Credits are currently linked.
28. **Initial Premium:** Provided at time of application.
29. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
30. **Initial Cap:** Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year.

Point to Point Value with Participation Rate

- 31. **Index:** Index to which these Index Credits are currently linked.
- 32. **Initial Premium:** Provided at time of application.
- 33. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
- 34. **Initial Participation Rate:** Range of 10% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year

Bond Value

- 35. **Index:** Index to which these Index Credits are currently linked.
- 36. **Initial Premium:** Provided at time of application.
- 37. **Index on Contract Date:** At issue of each new contract, based on Lehman Brothers U. S. Aggregate on the Contract Date.
- 38. **Initial Cap:** Range of 1% to unlimited and is at issue of each new contract, guaranteed for 1 Contract Year

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

FPDA-7-08

I certify only items within brackets on page 3, 3A and the signatures on page 1 are variable. They will vary as follows:

Page 1

Signatures are variable.

Page 3 and 3A

Items 1 through 8, 10 and 11 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

9. **Initial Bonus:** Initial dollar amount varies based on amount of Initial Premium.
12. **Guaranteed Initial Interest Rate:** Range of 2% to unlimited. We declare our current interest rate in advance and guarantee never less than MGIR-CV, for one contract year.
13. **Minimum Guaranteed Interest Rate:** Range of 1-3%. MGIR applies only to Minimum Guaranteed Surrender Value (MGSV), is set at issue, based on the average of five year Constant Maturity Treasury Rate for October 2008, and guaranteed for the MGIR-MGSV Guarantee Period.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

FPDA-10

I certify only items within brackets on pages 1, 3 and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

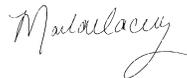
Items 1 through 11 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

12. **Guaranteed Initial Interest Rate:** Range of 1% to unlimited. We declare our current interest rate in advance and is guaranteed for the Initial Interest Rate Guarantee Period.

13. **Minimum Guaranteed Interest Rate:** At issue of each new contract with a range of 1% to 3%.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

FRG-02-09

I certify only items within brackets on page 3 and the signatures on page 1 are variable. They will vary as follows:

Page 1

Signatures are variable.

Page 3

Items 1 through 11, 13 and 14 on Page 3 are self-explanatory based on the specifics of the applicant as provided in the application.

12. **Bonus:** Contract form FRG-2-09 is a flexible premium deferred indexed annuity contract, with a bonus on all premiums received in the first contract year of [8% to 12%] for issue ages [0 to 78] and [3% to 7%] for issue ages [66 to 85]. We intend to have one bonus available up to a specified issue age and a reduced bonus for issue ages above that age.

We are filing issue age ranges and bonus percentage ranges as variable to allow for flexibility as market conditions change. We guarantee all contracts issued on any specified date will have the same issue age ranges and bonuses and will vary only as market conditions demand.

The applicant is informed of the bonus, its provisions and limitations on pages 3 and 6 of the contract, as well as in the disclosure required at application signing

15. **Guaranteed Initial Interest Rate:** The Guaranteed Initial Interest Rate can vary from 2% to unlimited, applies only to first year premium as described on page 7, set at issue and guaranteed for first contract year as shown on page 3.
16. **Minimum Guaranteed Interest Rate-MGSV:** The Minimum Guaranteed Interest Rate MGIR-CV will be 1-3%. MGIR-MGSV set at issue based on the average of the 5 yr constant maturity treasury rate for October of the previous year, as described on page 7, and guaranteed for the life of the contract.



Marla G. Lacey
Vice President, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

SPDA-MYGA

I certify only items within brackets on pages 1, 3, and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders.
Signatures are variable and will change only as officer's change.

Page 3, items 1 through 9 are self-explanatory based on the specifics of the applicant as provided in the application.

10. **Initial Guaranteed Interest Rate:** Range of 1% to unlimited. We declare our current interest rate in advance and are guaranteed for the Initial Interest Rate Guarantee Period.
11. **Initial Guarantee Period:** Eight Guarantee Periods, with eight corresponding MGIR and Surrender Charges. Applicant chooses at application.
12. **Minimum Guaranteed Interest Rate:** Range of 1-3%. MGIR is set at issue, based on the average of five year Constant Maturity Treasury Rate for October of the previous year, and guaranteed for the Guarantee Period.
13. **Initial Surrender Charge Period:** [3-10] Contract years.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011

STATEMENT OF VARIABILITY

INDEX-1-07

I certify only items within brackets on pages 1, 3; 3a and back cover are variable. They will vary as follows:

Page 1

Address and phone number will change only if we move, we will notify current contract holders. Signatures are variable and will change only as officer's change.

Page 3

Items 1 through 11 are self-explanatory and are based on the specifics of the applicant/owner as provided in the application.

12. **Minimum Guaranteed Interest Rate:** Range of 1-3%. At issue of each new contract, guaranteed for the life of contract and is based on the 2 month average of the 5 year Constant Maturity Treasury Rate in October of the previous year.
13. **Fixed Value Initial Premium:** Is allocated at issue of each new contract, as designated by applicant on Benefit Summary and Disclosure.
14. **Fixed Value Guaranteed Initial Interest Rate:** Range of 1% to unlimited and is at issue of each new contract, based on current declared interest rate for guarantee period.

Page 3a

15. **Guaranteed Minimum Cap:** Range of 1-4% based on market conditions.

S&P Averaged Value Specifications

16. **Index:** Index to which these Index Credits are currently linked.
17. **Initial Premium:** Provided at the time of the application.
18. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
19. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract.
20. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

S&P Point to Point Value Specifications

21. **Index:** Index to which these Index Credits are currently linked.
22. **Initial Premium:** Provided at the time of the application.
23. **Index on Contract Date:** At issue of each new contract, based on S&P 500 on the Contract Date.
24. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract
25. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Point to Point Value Specifications

26. **Index:** Index to which these Index Credits are currently linked.
27. **Initial Premium:** Provided at the time of the application.
28. **Index on Contract Date:** At issue of each new contract, based on DJIA on the Contract Date.

29. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract.
30. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

DJIA Averaged Value Specifications

31. **Index:** Index to which these Index Credits are currently linked.
32. **Initial Premium:** Provided at the time of the application.
33. **Index on Contract Date:** At issue of each new contract, based on DJIA on the Contract Date.
34. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract.
35. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

Bond Value Specifications

36. **Index:** Index to which these Index Credits are currently linked.
37. **Initial Premium:** Provided at the time of the application.
38. **Index on Contract Date:** At issue of each new contract, based on Lehman Brothers U. S. Aggregate on the Contract Date.
39. **Asset Fee Rate:** Range of 0% to 8% and is set at issue of each new contract, and guaranteed for life of Contract.
40. **Initial Cap:** Range of 1% to 40% and is at issue of each new contract, guaranteed for 1 Contract Year.

Back Cover

Address will change only if we move, we will notify current contract holders.



Marla G. Lacey
VP, Chief Compliance Officer & Associate General Counsel
October 10, 2011