

SERFF Tracking Number: MLLM-127311196 State: Arkansas  
 Filing Company: Zurich American Life Insurance Company State Tracking Number: 49321  
 Company Tracking Number: 0146PAL02-08  
 TOI: L09I Individual Life - Flexible Premium Sub-TOI: L09I.001 Single Life  
 Adjustable Life  
 Product Name: Amendatory Endorsement  
 Project Name/Number: Zurich American Life Insurance Company/UL121AE-01

## Filing at a Glance

Company: Zurich American Life Insurance Company

Product Name: Amendatory Endorsement SERFF Tr Num: MLLM-127311196 State: Arkansas  
 TOI: L09I Individual Life - Flexible Premium SERFF Status: Closed-Approved- State Tr Num: 49321  
 Adjustable Life Closed  
 Sub-TOI: L09I.001 Single Life Co Tr Num: 0146PAL02-08 State Status: Approved-Closed  
 Filing Type: Form Reviewer(s): Linda Bird  
 Author: Jeff Kulesus Disposition Date: 08/03/2011  
 Date Submitted: 07/15/2011 Disposition Status: Approved-Closed

Implementation Date Requested: On Approval

Implementation Date:

State Filing Description:

## General Information

Project Name: Zurich American Life Insurance Company  
 Project Number: UL121AE-01  
 Requested Filing Mode: Review & Approval  
 Explanation for Combination/Other:  
 Submission Type: New Submission  
 Overall Rate Impact:

Status of Filing in Domicile: Pending

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 08/03/2011

State Status Changed: 07/20/2011

Created By: Jeff Kulesus

Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Jeff Kulesus

Filing Description:

Milliman, Inc. is filing this submission on behalf of Zurich American Life Insurance Company ("ZALICO", or "the Company"). Attached is a letter signed by a ZALICO officer authorizing Milliman, Inc. to submit this filing on their behalf. The Amendatory Endorsement form UL121AE-01 is designed to conform previously approved Flexible Premium Adjustable Life Insurance Policy form UL121AR-01 to Section 7702 requirements. Form UL121AE-01 does not change any of the actuarial assumptions, pricing or the product design for Flexible Premium Adjustable Life Insurance Policy form UL121AR-01, which was approved by the Department on 08-25-2010, SERFF Tracking # MLLM-126729865, State Tracking # 46401.

In support of this filing, we are providing the following items with this submission:

1. Flesch Score Certification,

SERFF Tracking Number: MLLM-127311196 State: Arkansas  
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2. Statement of Variable Language, and
3. Authorization letter.

Thank you for your consideration of our filing. Please do not hesitate to contact me if you have any questions.

## Company and Contact

### Filing Contact Information

Jeff Kulesus, Consultant Jeff.Kulesus@Milliman.com  
 2 Conway Park, Ste. 180 312-499-5635 [Phone]  
 150 Field Drive 847-604-8671 [FAX]  
 Lake Forest, IL 60045

### Filing Company Information

(This filing was made by a third party - MUSA01)

Zurich American Life Insurance Company	CoCode: 90557	State of Domicile: Illinois
1400 American Lane	Group Code: 212	Company Type: Life and Annuity
Schaumburg, IL 60196-6801	Group Name:	State ID Number:
(887) 275-6017 ext. [Phone]	FEIN Number: 36-3050975	

## Filing Fees

Fee Required? Yes  
 Fee Amount: \$50.00  
 Retaliatory? Yes  
 Fee Explanation: 1 form x \$50.00@ = \$50.00  
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Zurich American Life Insurance Company	\$50.00	07/15/2011	49838161

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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	08/03/2011	08/03/2011
Approved-Closed	Linda Bird	07/20/2011	07/20/2011

### Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Form	Amendatory Endorsement	Jeff Kulesus	08/02/2011	08/02/2011

### Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Request to re-open	Note To Filer	Linda Bird	08/01/2011	08/01/2011

SERFF Tracking Number: MLLM-127311196 State: Arkansas  
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## Disposition

Disposition Date: 08/03/2011

Implementation Date:

Status: Approved-Closed

Comment: Correction made to the Amendatory Endorsement on the original submission.

Rate data does NOT apply to filing.

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<b>Schedule</b>	<b>Schedule Item</b>	<b>Schedule Item Status</b>	<b>Public Access</b>
<b>Supporting Document</b>	Flesch Certification		Yes
<b>Supporting Document</b>	Application		Yes
<b>Supporting Document</b>	Health - Actuarial Justification		No
<b>Supporting Document</b>	Outline of Coverage		No
<b>Supporting Document</b>	Third Party Authorization		Yes
<b>Supporting Document</b>	Statement of Variability		Yes
<b>Supporting Document</b>	Compliance Certification		Yes
<b>Form (revised)</b>	Amendatory Endorsement		Yes
<b>Form</b>	Amendatory Endorsement	Replaced	Yes

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## Disposition

Disposition Date: 07/20/2011

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

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**Amendment Letter**

Submitted Date: 08/02/2011

**Comments:**

Please substitute the attached copy of Amendatory Endorsement form UL121AE-01 for the copy provided with the initial submission. The attached copy improves Amendatory Endorsement synchronization language so that it more clearly matches the base policy form to which it will be attached. This change, however, does not affect the meaning or wording of the Amendatory Endorsement provisions.

**Changed Items:**

**Form Schedule Item Changes:**

**Form Schedule Item Changes:**

Form Number	Form Type	Form Name	Action	Form Action Other	Previous Filing #	Replaced Form #	Readability Score	Attachments
UL121AE-01	Policy/Contr	Amendatory Initial act/Fraternal Endorsement Certificate: t Amendment, Insert Page, Endorsement or Rider	Initial				50.500	UL121AE-01 Amendatory Endorsement 07-26-2011.pdf

*SERFF Tracking Number:* MLLM-127311196      *State:* Arkansas  
*Filing Company:* Zurich American Life Insurance Company      *State Tracking Number:* 49321  
*Company Tracking Number:* 0146PAL02-08  
*TOI:* L09I Individual Life - Flexible Premium      *Sub-TOI:* L09I.001 Single Life  
Adjustable Life  
*Product Name:* Amendatory Endorsement  
*Project Name/Number:* Zurich American Life Insurance Company/UL121AE-01

**Note To Filer**

**Created By:**

Linda Bird on 08/01/2011 03:28 PM

**Last Edited By:**

Linda Bird

**Submitted On:**

08/01/2011 03:28 PM

**Subject:**

Request to re-open

**Comments:**

Filing has been re-opened in order for correction to be made.

SERFF Tracking Number: MLLM-127311196 State: Arkansas  
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 Adjustable Life  
 Product Name: Amendatory Endorsement  
 Project Name/Number: Zurich American Life Insurance Company/UL121AE-01

## Form Schedule

Lead Form Number: UL121AE-01

Schedule Item Status	Form Number	Form Type Form Name	Action	Action Specific Data	Readability	Attachment
	UL121AE-01	Policy/Cont Amendatory ract/Fratern Endorsement al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		50.500	UL121AE-01 Amendatory Endorsement 07-26-2011.pdf

**ZURICH AMERICAN LIFE INSURANCE COMPANY**

Home Office: [Schaumburg, Illinois 60196-6801]

Administrative Office: [7045 College Boulevard, Overland Park, Kansas 66211-1523]

Phone: [(888) 634-6780]

**AMENDATORY ENDORSEMENT**

This endorsement amends the policy to which it is attached. It is effective as of the Issue Date of the policy shown on the Schedule Page.

**DEATH BENEFIT**

The following language has been inserted in the DEATH BENEFIT provision of the policy, after the paragraph which reads 'Under Option A or Option C, ...':

In the calculation of the Death Benefit in items (1), and (2), as shown above, if the Surrender Value on the date of death due to Provision (3) of the Surrender paragraph in this contract exceeds the Surrender Value on the date of death without regard to that provision, then any such excess will be added to the Policy Value in such calculation.

**PREMIUMS**

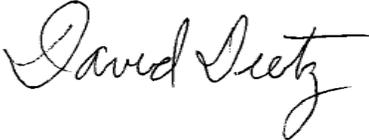
The fourth paragraph of the PREMIUMS provision is amended to read as follows:

If the Internal Revenue Service Code Section 7702 Test is the Guideline Premium Test, We will not accept any premium if it causes the policy to fail the Guideline Premium Requirements for a life insurance policy as defined in Section 7702 of the Internal Revenue Code on the Issue Date. If we receive a premium in excess of the Guideline Premium limitation, We will refund the excess amount to the Owner. The refund will include interest from the date the refund is due to the date of payment, unless the Owner has given other instructions to Us in writing which We have accepted and acknowledged. However, premium will not be refunded if it is necessary to keep the policy in force.

Signed for Zurich American Life Insurance Company.



SECRETARY



PRESIDENT

SERFF Tracking Number: MLLM-127311196 State: Arkansas  
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## Supporting Document Schedules

**Item Status:** **Status Date:**

**Satisfied - Item:** Flesch Certification

**Comments:**

Flesch Certification

**Attachment:**

Readability Certification.pdf

**Item Status:** **Status Date:**

**Satisfied - Item:** Application

**Comments:**

Application form ZM-10300GK (07/10) was previously approved on 08-31-2010, SERFF Tracking # MLLM-126729863 and is used with policy form UL121AL-01 to which Amendatory Endorsement form UL121AE-01 will be attached.

**Item Status:** **Status Date:**

**Bypassed - Item:** Health - Actuarial Justification

**Bypass Reason:** There are no health benefits or features associated with form UL121AE-01; therefore, we request that this requirement be waived.

**Comments:**

**Item Status:** **Status Date:**

**Bypassed - Item:** Outline of Coverage

**Bypass Reason:** There are no health benefits or features associated with form UL121AE-01; therefore, we request that this requirement be waived.

**Comments:**

**Item Status:** **Status Date:**

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**Satisfied - Item:** Third Party Authorization

**Comments:**

Third Party Authorization

**Attachment:**

Third Party Authorization Letter.pdf

**Item Status:**

**Status  
Date:**

**Satisfied - Item:** Statement of Variability

**Comments:**

Statement of Variability

**Attachment:**

Statement of Variability.pdf

**Item Status:**

**Status  
Date:**

**Satisfied - Item:** Compliance Certification

**Comments:**

Compliance Certification

**Attachment:**

Arkansas Compliance Certification.pdf

# Zurich American Life Insurance Company

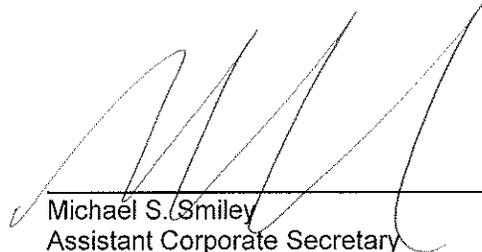
## READABILITY CERTIFICATION

I hereby certify on behalf of Zurich American Life Insurance Company that the following form has been tested by an acceptable method specified in the Model Law (all forms were scored together as part of the contract with which they may be used) and obtained the Flesch score indicated:

<b>Form Number</b>	<b>Description</b>	<b>Flesch Score</b>
UL121AE-01	Amendatory Endorsement	50.5

I hereby certify that the above form complies with the N.A.I.C. Model Policy Language Simplification Act. The form described above is presented in no less than ten point type, one point leaded. The style, arrangement and overall appearance of the forms gives no undue prominence to any portion of the text or section of the form.

Unless we hear from you to the contrary, we will assume that this certification satisfies the certification requirements for compliance with any present or future readability law enacted by your state. We understand that this certification will not be valid to the extent that there is a material difference between the readability law of your state and the N.A.I.C. Model.



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Michael S. Smiley  
Assistant Corporate Secretary

Date: July 15, 2011

April 5, 2011

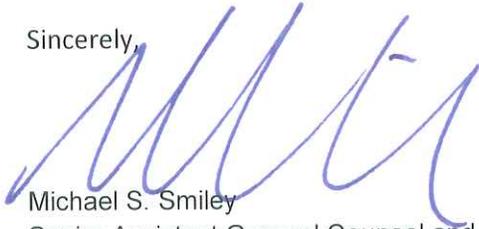
Jeff Kulesus, FLMI  
Consultant  
Milliman, Inc.  
Two Conway Park  
150 Field Drive, Suite 180  
Lake Forest, Illinois 60045

**RE: State Insurance Filings  
Zurich American Life Insurance Company  
NAIC # 90557**

Dear Mr. Kulesus:

This letter will serve as authorization from Zurich American Life Insurance Company for employees of Milliman, Inc. to file policy forms and other related material on the company's behalf. It also authorizes Milliman to respond to inquiries on our behalf with all state insurance departments and jurisdictions where Zurich American Life Insurance Company is authorized to do business.

Sincerely,



Michael S. Smiley  
Senior Assistant General Counsel and  
Assistant Secretary  
Zurich American Life Insurance Company  
Tel: (917) 534-4864

## Statement of Variability for Form UL121AE-01, Amendatory Endorsement

<b>Page Number / Location</b>	<b>Provision or Section</b>	<b>Bracketed Item</b>	<b>Description of Variable</b>	<b>Use</b>
First Page	HOME OFFICE	Schaumburg, Illinois 60196-6801	Company's home office address	If the company's home office city, state or Zip Code changes, this information will be replaced with the current city, state or Zip Code.
First Page	ADMINISTRATIVE OFFICE	7045 College Boulevard, Overland Park, KS 66211-1523	Company's administrative office address	If the company's administrative office address changes, address will be replaced with the current address.
First Page	TOLL FREE TELEPHONE NUMBER	(888) 634-6780	Company's toll free telephone number	If the company's toll free telephone number changes, the telephone number will be replaced with the current toll free telephone number.
Bottom of the Page	SECRETARY SIGNATURE	Secretary	Signature of appointed Secretary at the time the policy is issued	If a change in Secretaries occurs, the signature will be replaced with the then acting Secretary.
Bottom of the Page	SECRETARY SIGNATURE	President	Signature of appointed President at the time the policy is issued	If a change in Presidents occurs, the signature will be replaced with the then acting President.

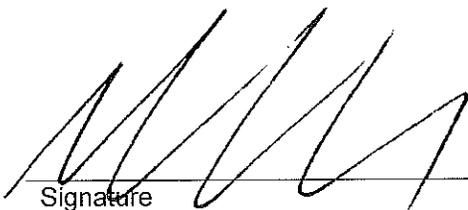


**Arkansas Compliance Certification**

Company: Zurich American Life Insurance Company

Form: UL121AE-01 Amendatory Endorsement

On behalf of Zurich American Life Insurance Company (Company) I certify that the above form complies with the requirements of Regulation 34 and Bulletin 11-83.



Signature  
Michael S. Smiley,  
Assistant Corporate Secretary

July 15, 2011

Date

Name/Title

SERFF Tracking Number: MLLM-127311196 State: Arkansas  
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## 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)
07/07/2011	Form	Amendatory Endorsement	08/02/2011	UL121AE-01 Amendatory Endorsement.pdf (Superceded)

**ZURICH AMERICAN LIFE INSURANCE COMPANY**

Home Office: [Schaumburg, Illinois 60196-6801]

Administrative Office: [7045 College Boulevard, Overland Park, Kansas 66211-1523]

Phone: [(888) 634-6780]

**AMENDATORY ENDORSEMENT**

This endorsement amends the policy to which it is attached. It is effective as of the Issue Date of the policy shown on the Schedule Page.

**DEATH BENEFIT**

The following language has been inserted in the DEATH BENEFIT provision of the policy, after the paragraph which reads 'Under all death benefit options...':

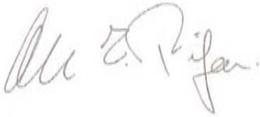
In the calculation of the Death Benefit in items (1), (2), and (3), as shown above, if the Surrender Value on the date of death due to Provision (3) of the Surrender paragraph in this contract exceeds the Surrender Value on the date of death without regard to that provision, then any such excess will be added to the Policy Value in such calculation.

**PREMIUMS**

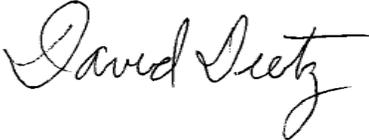
The fourth paragraph of the PREMIUMS provision is amended to read as follows:

If the Internal Revenue Service Code Section 7702 Test is the Guideline Premium Test, We will not accept any premium if it causes the policy to fail the Guideline Premium Requirements for a life insurance policy as defined in Section 7702 of the Internal Revenue Code on the Issue Date. If we receive a premium in excess of the Guideline Premium limitation, We will refund the excess amount to the Owner. The refund will include interest from the date the refund is due to the date of payment, unless the Owner has given other instructions to Us in writing which We have accepted and acknowledged. However, premium will not be refunded if it is necessary to keep the policy in force.

Signed for Zurich American Life Insurance Company.



SECRETARY



PRESIDENT