Loan-Based Split Dollar

For Frank Contini



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

Preface

This executive fringe benefit involves a series of employer-sponsored loans to a valued executive for the purpose of purchasing a cash value life insurance policy.

Promissory Notes: The loans associated with the arrangement are evidenced by a series of promissory notes between the employer and the executive, and the life insurance policy is assigned as collateral security for the loans. The loans are term loans, i.e., they are due at the end of a specific period of years; however, the promissory note calls for the acceleration of repayment should the executive die prior to the date of scheduled loan repayments.

Loan Interest: The interest rate for the life of each loan is set at least to the long-term rate in effect at the beginning of the loan under IRC Sections 7872(f)(2)(A) and 1274(d) (often referred to as the "Applicable Federal Rate" or "AFR"). As an additional benefit in some arrangements, the employer will help offset the executive's loan interest payments via a bonus.

If no interest or an inadequate rate of interest is charged on a loan, the IRS recharacterizes the loan into an "arms-length" transaction and imputes an interest rate that is deemed to have been received by the lender and paid by the borrower. The rate is published monthly and is determined by the length of the loan transaction, i.e., either the short-term rate (3 years or less), the mid-term rate (over 3 years but not over 9 years), or the long-term rate (over 9 years).

So long as the loan interest rate is equal to or exceeds the Applicable Federal Rate, no interest is imputed by the IRS on the transaction. For illustrative purposes, the entire series of premium loans illustrated in the accompanying material reflects a constant 3.37% interest rate, the long-term AFR in effect for the month in which this report is written (May 2014).

The loan interest rate for each new loan will likely be different, and each future loan must bear interest equal to or greater than the AFR in effect during the month the new loan is executed. Each new loan should be evidenced by its own promissory note as well.

There are four ways to deal with unknown future loan interest rates:

- 1. If a bonus is paid to the executive to offset the loan interest, accept the risk: Changing interest rates may increase or decrease the amount of the bonus; however, the loan interest paid to the employer by the executive should provide a significant offset.
- 2. Accrue additional loan interest: If the loan interest rate increases, the executive could be allowed to accrue the additional loan interest. Alternatively, the executive may be able to withdraw funds from the policy to make up the difference in the loan interest due.
- 3. Renegotiate the loans: Wait until a time when AFR dips and recast the series of promissory notes into a new note at the reduced rate.
- 4. Consolidate all loans at the inception of the plan: In this case, the loaned funds in excess of the amount needed to pay the policy's initial premium should be reserved by the executive to pay the remaining stream of premiums as they fall due. The employer may wish to consider requiring some form of custodianship for the reserved funds to be certain they are used for the intended purpose.

Presented By: [Licensed User's name appears here]

Preface (continued)

Repayment of Loans from the Employer

In the event of the executive's death, the employer's loans are repaid from the life insurance policy's death benefit; otherwise, loan repayment is handled in one of the following ways.

- 1. The executive uses personal funds to repay the loans from the employer.
- 2. The executive borrows against the policy or surrenders a portion of policy values to repay the loans from the employer.
- 3. The employer bonuses an amount to the executive to offset the repayment of the loans.
- 4. The employer grosses up a bonus to the executive to offset both the repayment of the loans and the tax on the bonus.

Living Benefits for the Executive

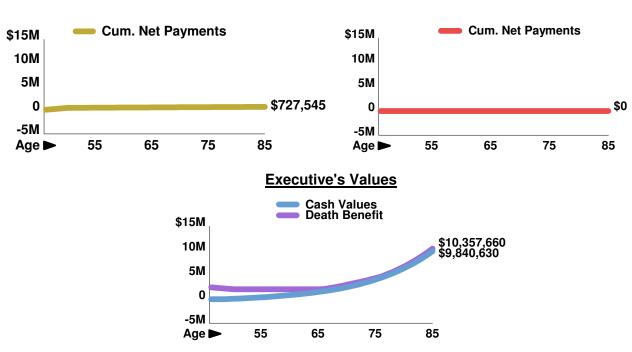
access to policy cash values in excess of the amount required to collateralize the loans from the employer.

access to the cash values. The cash values can be accessed via: 1) policy loans or 2) policy withdrawals or 3) a combination of loans and withdrawals.

Death Benefits for Beneficiaries

Executive's Payments

Income tax free death benefits from the executive's share of the life insurance policy's death benefit can produce income streams for the executive's family or liquidity to help offset wealth transfer taxes.



Employer's Payments

IRC Section 409A: Section 409A should not apply

to loan regime collateral assignment split dollar

plans unless the employer is bound by the agreement

between the parties to forgive the loan, waive

The executive may, if the parties agree, have direct

If the loans have been repaid, the executive has free

Notes

payments, etc.

Be sure to consult with your own tax attorney and accountant before entering into this or any other arrangement involving tax, legal, and economic considerations.

Supplemental Report: Duration of Loans

Contini Brothers, Inc.

Each premium payment is considered a new loan, and the accompanying illustrations reflect loans that may remain in effect for many years. Most loans illustrated are assumed to be long-term loans (over 9 years) bearing a loan interest rate equal to or greater than the Applicable Federal Rate of 3.37% for May 2014. Other Applicable Federal Rates in effect for May 2014 are:

Mid-term loans (over 3 years but not over 9): 1.93%;

Short-term loans (3 years or less): 0.33%;

Demand loans: 0.33%.

The demand loan rate changes monthly -- an unhappy condition for a loan expected to remain in effect for many years. A so-called "blended" rate that is stable for one year at a time can be used for demand loans. The 2014 blended rate for demand loans will not be announced until late June 2014.

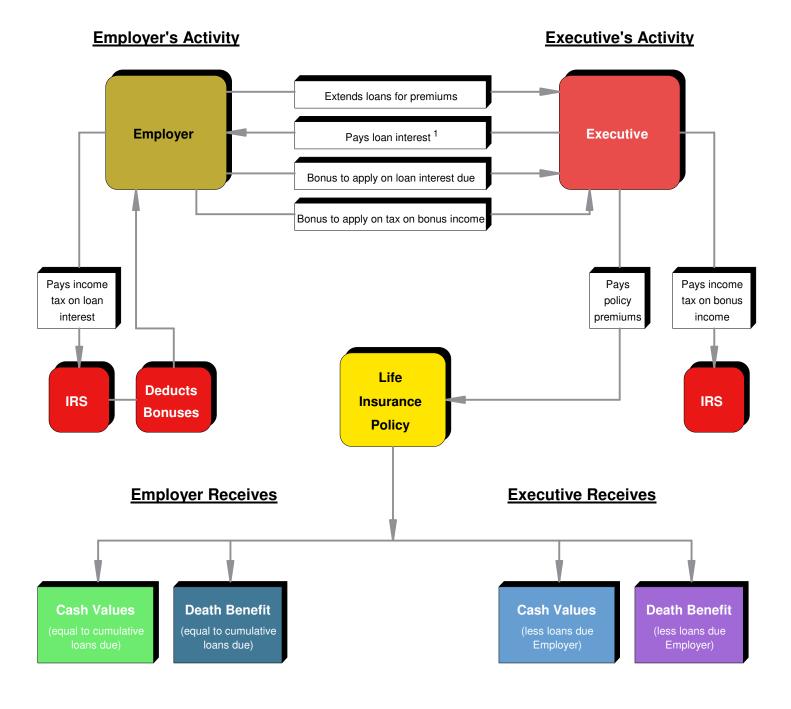
Stability of loan interest is an important component of any arrangement involving loans. A dramatic rise in loan interest rates at the maturity of a demand, short-term or mid-term loan may result in less-than-acceptable loan interest rates when the loan is renewed. When you are dealing with a financial arrangement of many years, long-term loans produce more stable interest rates that can be renegotiated downward should rates decline, but are capped at rates that are known as each loan is made. For an example of renegotiating loan interest downward, see the report entitled "Renegotiating the Applicable Federal Rate".

Due to the relative stability of the long-term Applicable Federal Rate coupled with the ability to renegotiate it downward, you may wish to establish your arrangement using long-term loans.

Flow Chart

Insured: Frank Contini

Contini Brothers, Inc.



¹ If the loan interest paid on each loan is equal to or greater than the Applicable Federal Rate established under IRC Sections 7872(f)(2)(A) and 1274(d), then no additional loan interest will be imputed to the Executive.

Illustration of Policy Values Funding The Plan

		Indexed Interest 8.50°	Rate Prem	ium Death	l Policy Benefit 00,000	
Year	Male Age	(1) Policy Premium	(2) Pre-Tax Policy Cash Flow	(3) Year End Accum Value*	(4) Year End Cash Value*	(5) Death Benefit
1 2 3 4 5 6 7 8	45 46 47 48 49 50 51 52	100,000 100,000 100,000 100,000 100,000 0 0 0	0 0 0 0 0 0 0 0	102,198 213,869 335,427 467,797 612,010 659,828 711,459 767,257	67,198 143,869 260,927 393,297 537,510 589,053 645,154 706,167	2,500,000 2,500,000 2,500,000 2,500,000 2,500,000 2,500,000 2,500,000 2,500,000
9 10 11	53 54 55	0 0 0	0 0 0	827,578 892,823 963,473	772,448 844,398 922,498	2,500,000 2,500,000 2,500,000
12 13 14 15	56 57 58 59	0 0 0	0 0 0 0	1,040,048 1,123,108 1,213,329 1,311,468	1,007,268 1,099,268 1,199,174 1,311,468	2,500,000 2,500,000 2,500,000 2,500,000
16 17 18 19 20	60 61 62 63 64	0 0 0 0 0	0 0 0 0	1,418,351 1,534,977 1,662,474 1,802,130 1,955,453	1,418,351 1,534,977 1,662,474 1,802,130 1,955,453	2,500,000 2,500,000 2,500,000 2,500,000 2,500,000
21 22 23 24	65 66 67 68	0 0 0 0	0 0 0 0	2,125,195 2,309,400 2,509,282 2,726,177	2,125,195 2,309,400 2,509,282 2,726,177	2,550,235 2,748,186 2,960,953 3,189,627
25 26 27 28	69 70 71 72	0 0 0	0 0 0 0	2,961,520 3,216,891 3,494,923 3,797,933	2,961,520 3,216,891 3,494,923 3,797,933	3,103,027 3,435,364 3,699,425 3,949,263 4,215,706
29 30	73 74	0 0 500,000	0 0 0	4,128,571 4,489,880	4,128,571 4,489,879	4,500,143 4,804,171

*This is an example of an InsMark supplemental illustration for indexed universal life. In an actual presentation, this footnote will refer to an accompanying basic illustration from a specific life insurance company with important details, caveats, and guarantees.

30 Year Summary

Cum. Payments	500,000
Cum. Pre-Tax Policy Cash Flow	0
Cash Value	4,489,879
Death Benefit	4,804,171

Insured: Frank Contini

Contini Brothers, Inc.

Presented By: [Licensed User's name appears here]

Insured: Frank Contini

Contini Brothers, Inc.

Illustration of Policy Values Funding The Plan

		Indexed Interest 8.50°	Rate Premi	um Death	l Policy n Benefit 00,000	
		(1)	(2)	(3) Veen Fred	(4) Maan Frid	(5)
	Male	Policy	Pre-Tax Policy	Year End Accum	Year End Cash	Death
Year	Age	Premium	Cash Flow	Value*	Value*	Benefit
		Trennam	cash now	value	Value	Denent
31	75	0	0	4,885,382	4,885,381	5,129,651
32	76	0	0	5,314,828	5,314,828	5,580,569
33	77	0	0	5,780,954	5,780,954	6,070,001
34	78	0	0	6,286,679	6,286,679	6,601,013
35	79	0	0	6,835,120	6,835,119	7,176,875
36	80	0	0	7,429,587	7,429,587	7,801,066
37	81	0	0	8,073,577	8,073,577	8,477,256
38	82	0	0	8,770,794	8,770,794	9,209,334
39	83	0	0	9,525,122	9,525,122	10,001,380
40	84	0	0	10,340,630	10,340,630	10,857,660

500,000

0

*This is an example of an InsMark supplemental illustration for indexed universal life. In an actual presentation, this footnote will refer to an accompanying basic illustration from a specific life insurance company with important details, caveats, and guarantees.

40 Year Summary

Cum. Payments	500,000
Cum. Pre-Tax Policy Cash Flow	0
Cash Value	10,340,630
Death Benefit	10,857,660

Presented By: [Licensed User's name appears here]

Summary

Insured: Frank Contini

Contini Brothers, Inc.

	Emplo Tax Br 34.0	racket Tax		dexed UL erest Rate 8.50%	Initial Policy Death Benefit 2,500,000	Assumed Long-Term AFR for All Years Illustrated 3.37%		Interest F	Promissory Note Interest Rate 3.37%		
			Empl	oyer			Execu	tive			
		<u>.</u>				2	L	oan Collateral			
		(1)	(2)	(3) Portion of Col. (2)	(4) Cumulative	(5)	(6)	(7)	(8)		
			Cumulative	Due as a	Charge to						
Year	Male Age	Net Payment*	Net Payments	Loan Receivable	Earnings (2) - (3)	Net Payment*	Accum Value**	Cash Value**	Death Benefit		
1	45	101,198	101,198	100,000	1,198	0	102,198	67,198	2,500,000		
2	46	102,396	203,594	200,000	3,594	0	213.869	143,869	2,500,000		
3	47	103,593	307,187	300,000	7,187	0	335,427	260,927	2,500,000		
4	48	104,790	411,977	400,000	11,977	0	467,797	393,297	2,500,000		
5	49	105,988	517,965	500,000	17,965	0	612,010	537,510	2,500,000		
6	50	5,988	523,953	500,000	23,953	0	659,828	589,053	2,500,000		
7	51	5,988	529,941	500,000	29,941	0	711,459	645,154	2,500,000		
8	52	5,988	535,929	500,000	35,929	0	767,257	706,167	2,500,000		
9	53	5,988	541,917	500,000	41,917	0	827,578	772,448	2,500,000		
10	54	5,988	547,905	500,000	47,905	0	892,823	844,398	2,500,000		
11	55	5,988	553,893	500,000	53,893	0	963,473	922,498	2,500,000		
12	56	5,988	559,881	500,000	59,881	0	1,040,048	1,007,268	2,500,000		
13	57	5,988	565,869	500,000	65,869	0	1,123,108	1,099,268	2,500,000		
14	58	5,988	571,857	500,000	71,857	0	1,213,329	1,199,174	2,500,000		
15	59	5,988	577,845	500,000	77,845	0	1,311,468	1,311,468	2,500,000		
16	60	5,988	583,833	500,000	83,833	0	1,418,351	1,418,351	2,500,000		
17	61	5,988	589,821	500,000	89,821	0	1,534,977	1,534,977	2,500,000		
18	62	5,988	595,809	500,000	95,809	0	1,662,474	1,662,474	2,500,000		
19	63	5,988	601,797	500,000	101,797	0	1,802,130	1,802,130	2,500,000		
20	64	5,988	607,785	500,000	107,785	0	1,955,453	1,955,453	2,500,000		
21	65	5,988	613,773	500,000	113,773	0	2,125,195	2,125,195	2,550,235		
22	66	5,988	619,761	500,000	119,761	0	2,309,400	2,309,400	2,748,186		
23	67	5,988	625,749	500,000	125,749	0	2,509,282	2,509,282	2,960,953		
24	68	5,988	631,737	500,000	131,737	0	2,726,177	2,726,177	3,189,627		
25	69	5,988	637,725	500,000	137,725	0	2,961,520	2,961,520	3,435,364		
26	70	5,988	643,713	500,000	143,713	0	3,216,891	3,216,891	3,699,425		
27	71	5,988	649,701	500,000	149,701	0	3,494,923	3,494,923	3,949,263		
28	72	5,988	655,689	500,000	155,689	0	3,797,933	3,797,933	4,215,706		
29	73	5,988	661,677	500,000	161,677	0	4,128,571	4,128,571	4,500,143		
30	74	5,988	667,665	500,000	167,665	0	4,489,880	4,489,879	4,804,171		
		667,665				0					

Executive's 30 Year Summary

*See appropriate Net Payment Analysis for details. Living Values[†] Death Benefit **This is an example of an InsMark supplemental Indexed Universal Life: 4,489,879 4,804,171 illustration for indexed universal life. In an actual Less Loan Repayment Due Employer: 500,000 500,000 presentation, this footnote will refer to an accompanying Equals Executive's Net Value: 3,989,879 4,304,171 basic illustration from a specific life insurance company with important details, caveats, and guarantees. †Cash value less employer's loans.

Presented By: [Licensed User's name appears here]

Summary

Insured: Frank Contini

Contini Brothers, Inc.

	Employ Tax Bra 34.00	acket Tax		dexed UL erest Rate 8.50%	Initial Policy Death Benefit 2,500,000	for All Yea	ong-Term AFR irs Illustrated 37%	Promissor Interest I 3.37%	Rate
			Empl	oyer			Exec	utive	
								Loan Collateral	
		(1)	(2)	(3) Portion of Col. (2)	(4) Cumulative	(5)	(6)	(7)	(8)
Year	Male Age	Net Payment*	Cumulative Net Payments	Due as a Loan Receivable	Charge to Earnings (2) - (3)	Net Payment*	Accum Value**	Cash Value**	Death Benefit
31	75	5,988	673,653	500,000	173,653	0	4,885,382	4,885,381	5,129,651
32	76	5,988	679,641	500,000	179,641	0	5,314,828	5,314,828	5,580,569
33	77	5,988	685,629	500,000	185,629	0	5,780,954	5,780,954	6,070,001
34	78 70	5,988	691,617	500,000	191,617	0	6,286,679	6,286,679	6,601,013
35 36	79 80	5,988 5,988	697,605 703,593	500,000 500,000	197,605 203,593	0 0	6,835,120 7,429,587	6,835,119 7,429,587	7,176,875 7,801,066
30	80 81	5,988	703,593	500,000	203,593	0	8,073,577	8,073,577	8,477,256
38	82	5,988	715,569	500,000	215,569	Ő	8,770,794	8,770,794	9,209,334
39	83	5,988	721,557	500,000	221,557	0	9,525,122	9,525,122	10,001,380
40	84	5,988	727,545	500,000	227,545	0	10,340,630	10,340,630	10,857,660

727,545

0

Executive's 40 Year Summary

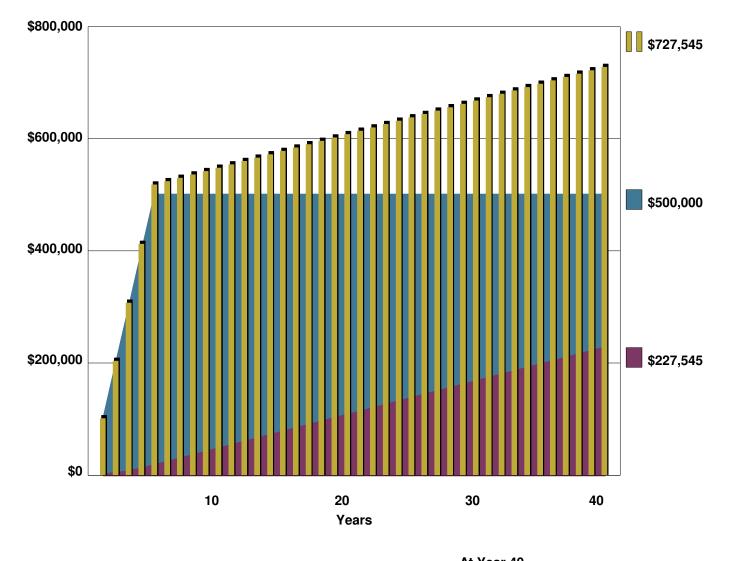
*See appropriate Net Payment Analysis for details. Living Values[†] Death Benefit **This is an example of an InsMark supplemental Indexed Universal Life: 10,340,630 10,857,660 illustration for indexed universal life. In an actual Less Loan Repayment Due Employer: 500,000 500,000 10,357,660 presentation, this footnote will refer to an accompanying Equals Executive's Net Value: 9,840,630 basic illustration from a specific life insurance company with important details, caveats, and guarantees. †Cash value less employer's loans.

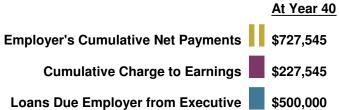
Presented By: [Licensed User's name appears here]

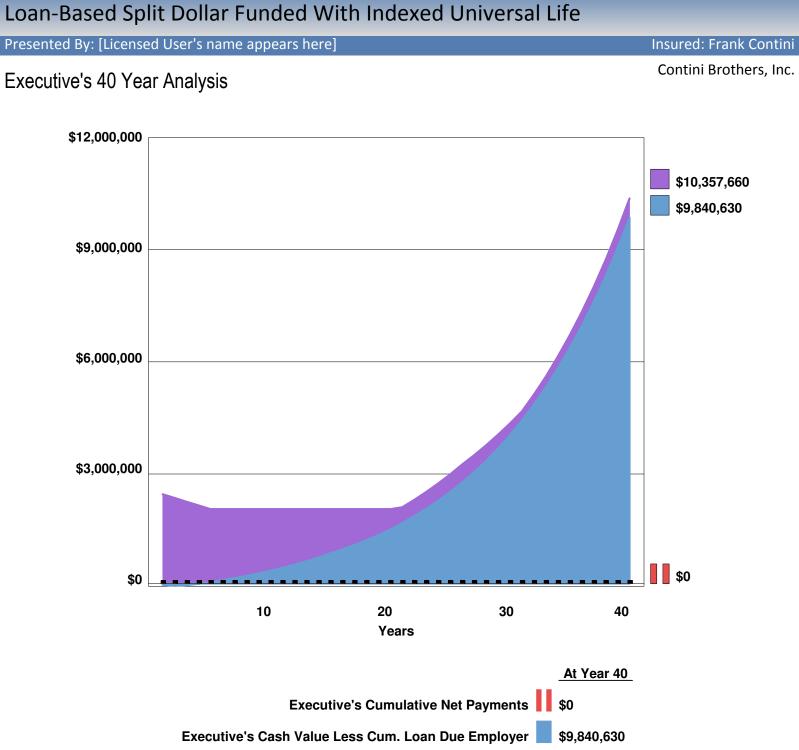
Insured: Frank Contini

Contini Brothers, Inc.

Employer's 40 Year Analysis







Executive's Death Benefit Less Cum. Loan Due Employer \$10,357,660

Insured: Frank Contini

Contini Brothers, Inc.

Employer's Net Payment Analysis

			Tax	loyer's A Bracket .00%	Assumed Long- for All Years I 3.37%	llustrated	Promissory Interest F 3.37%	Rate		
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Year	Male Age	Beginning of Year Loan to Executive	Cumulative Loan to Executive	Loan Interest Received from Executive	After Tax Loan Interest Received from Executive	Bonus Paid to Executive	After Tax Cost of Bonus Paid to Executive	Employer's Net Payment (1) - (4) + (6)	Employer's Annual Charge to Earnings (6) - (4)	Employer's Cumulative Charge to Earnings
1	45	100,000	100,000	3,370	2,224	5,185	3,422	101,198	1,198	1,198
2	46	100,000	200,000	6,740	4,448	10,369	6,844	102,396	2,396	3,594
3	47	100,000	300,000	10,110	6,673	15,554	10,266	103,593	3,593	7,187
4	48	100,000	400,000	13,480	8,897	20,738	13,687	104,790	4,790	11,977
5	49	100,000	500,000	16,850	11,121	25,923	17,109	105,988	5,988	17,965
6	50	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	23,953
7	51	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	29,941
8	52	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	35,929
9	53	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	41,917
10	54	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	47,905
11	55	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	53,893
12	56	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	59,881
13	57	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	65,869
14	58	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	71,857
15	59	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	77,845
16	60	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	83,833
17	61	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	89,821
18	62	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	95,809
19	63	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	101,797
20	64	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	107,785
21	65	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	113,773
22	66	0 0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	119,761
23	67	Ū	500,000	16,850	11,121	25,923	17,109	5,988	5,988	125,749
24	68	0 0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	131,737
25	69	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	137,725
26	70	0 0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	143,713
27	71	Ő	500,000	16,850	11,121	25,923	17,109	5,988	5,988	149,701
28	72	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	155,689
29	73	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	161,677
30	74	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	167,665
		500,000		471,800	311,388	725,844	479,053	667,665	167,665	

The promissory note between the employer and the executive is presumed to be secured by a collateral assignment of the policy.

*See the accompanying supplemental report entitled "Loan-Based Split Dollar (Preface)" for remarks regarding loan interest rates used in this illustration.

The employer's loans must be repaid no later than the date specified in the plan documentation.

Employer's

Tax Bracket

34.00%

Employer's Net Payment Analysis

Date: 05/05/2014	

500,000

loan interest rates used in this illustration.

*See the accompanying supplemental report entitled "Loan-Based Split Dollar (Preface)" for remarks regarding

Page	12 of	16
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422,598

985,074

650,143

640,300

The promissory note between the employer and the executive is presumed to be secured by a collateral assignment of the policy.

727,545

227,545

The employer's loans must be repaid no later than the date specified in the plan documentation.

Contini Brothers, Inc.

Year	Male Age	(1) Beginning of Year Loan to Executive	(2) Cumulative Loan to Executive	(3) Loan Interest Received from Executive	(4) After Tax Loan Interest Received from Executive	(5) Bonus Paid to Executive	(6) After Tax Cost of Bonus Paid to Executive	(7) Employer's Net Payment (1) - (4) + (6)	(8) Employer's Annual Charge to Earnings (6) - (4)	(9) Employer's Cumulative Charge to Earnings
31	75	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	173,653
32	76	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	179,641
33	77	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	185,629
34	78	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	191,617
35	79	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	197,605
36	80	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	203,593
37	81	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	209,581
38	82	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	215,569
39	83	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	221,557
40	84	0	500,000	16,850	11,121	25,923	17,109	5,988	5,988	227,545

Assumed Long-Term AFR

for All Years Illustrated

3.37%*

Promissory Note Interest Rate

3.37%

Contini Brothers, Inc.

Executive's Net Payment Analysis

		Та	kecutive's Ix Bracket 35.00%	Assumed Long for All Years I 3.37%	llustrated	Promissory Note Interest Rate 3.37%	Ģ	
Year	Male Age	(1) Policy Premium Due by Executive	(2) Beginning of Year Loan from Employer	(3) Cumulative Loan Due Employer	(4) Loan Interest Paid to Employer	(5) Bonus Received from Employer	(6) After Tax Bonus Received from Employer	(7) Executive's Net Payment**
1	45	100,000	100,000	100,000	3,370	5,185	3,370	0
2	46	100,000	100,000	200,000	6,740	10,369	6,740	0
3	47	100,000	100,000	300,000	10,110	15,554	10,110	0
4	48	100,000	100,000	400,000	13,480	20,738	13,480	0
5	49	100,000	100,000	500,000	16,850	25,923	16,850	0
6	50	0	0	500,000	16,850	25,923	16,850	0
7 8	51 52	0 0	0	500,000	16,850	25,923	16,850	0 0
о 9	ວ∠ 53	0	0 0	500,000	16,850	25,923 25,923	16,850 16,850	0
9 10	53 54	0	0	500,000 500,000	16,850 16,850	25,923	16,850	0
10	54	U	U	500,000	10,050	25,525	10,050	U
11	55	0	0	500,000	16,850	25,923	16,850	0
12	56	0	0	500,000	16,850	25,923	16,850	0
13	57	0	0	500,000	16,850	25,923	16,850	0
14	58	0	0	500,000	16,850	25,923	16,850	0
15	59	0	0	500,000	16,850	25,923	16,850	0
16	60	0	0	500,000	16,850	25,923	16,850	0
17	61	0	0	500,000	16,850	25,923	16,850	0
18	62	0	0	500,000	16,850	25,923	16,850	0
19	63	0	0	500,000	16,850	25,923	16,850	0
20	64	0	0	500,000	16,850	25,923	16,850	0
21	65	0	0	500,000	16,850	25.923	16,850	0
22	66	Ő	ů 0	500,000	16,850	25,923	16,850	Ő
23	67	ŏ	ů 0	500,000	16,850	25,923	16,850	ŏ
24	68	0	0	500,000	16,850	25,923	16,850	0
25	69	0	0	500,000	16,850	25,923	16,850	0
26	70	0	0	500,000	16,850	25,923	16,850	0
27	71	0	0	500,000	16,850	25,923	16,850	0
28	72	0	0	500,000	16,850	25,923	16,850	0
29	73	0	0	500,000	16,850	25,923	16,850	0
30	74	0	0	500,000	16,850	25,923	16,850	0
		500,000	500,000		471,800	725,844	471,800	0

*See the accompanying supplemental report entitled "Loan-Based Split Dollar (Preface)" for remarks regarding loan interest rates used in this illustration.

 $^{**}Column (7) = Columns (1) - (2) + (4) - (6)$

The promissory note between the employer and the executive is presumed to be secured by a collateral assignment of the policy.

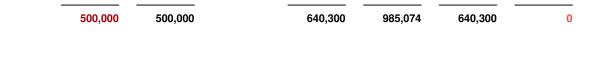
The employer's loans must be repaid no later than the date specified in the plan documentation.

Insured: Frank Contini

Contini Brothers, Inc.

Executive's Net Payment Analysis

Executive'sAssumed Long-Term AFRPromissory NoteTax Bracketfor All Years IllustratedInterest Rate35.00%3.37%*3.37%	
Policy PremiumBeginning of YearLoanBonusAfter BonusCumulativeInterestReceivedReceived	(6) (7) iter Tax Bonus eceived Executive's from Net
Year Age Executive Employer Employer Employer Employer Employer	nployer Payment**
31 75 0 0 500,000 16,850 25,923	16,850 0
32 76 0 0 500,000 16,850 25,923	16,850 0
33 77 0 0 500,000 16,850 25,923	16,850 0
34 78 0 0 500,000 16,850 25,923	16,850 0
35 79 0 0 500,000 16,850 25,923	16,850 0
36 80 0 0 500,000 16,850 25,923	16,850 0
37 81 0 0 500,000 16,850 25,923	16,850 0
38 82 0 0 500,000 16,850 25,923	16,850 0
39 83 0 0 500,000 16,850 25,923	16,850 0
40 84 0 0 500,000 16,850 25,923	16,850 0



*See the accompanying supplemental report entitled "Loan-Based Split Dollar (Preface)" for remarks regarding loan interest rates used in this illustration.

**Column (7) = Columns (1) - (2) + (4) - (6)

The promissory note between the employer and the executive is presumed to be secured by a collateral assignment of the policy.

The employer's loans must be repaid no later than the date specified in the plan documentation.

Promissory Note Analysis

Assumed Long-Term AFR for All Years Illustrated 3.37%** Promissory Note Interest Rate 3.37%

								Loan Collateral		
		(1)	(2) Annual	(3) Annual	(4) Loan	(5) Loan	(6)	(7)	(8)	(9)
		Beginning	Loan Interest	Loan Interest	Repayments	Repayments	Year End	Year End	Year End	Year End
		of Year	Paid from	Paid from	from	from	Cumulative	Policy	Policy	Policy
	Male	Loan to	Non-Policy	Policy	Non-Policy	Policy	Loan to	Accum	Cash	Death
Year	Age	Executive	Values	Values	Values	Values	Executive	Value*	Value*	Benefit*
1	45	100,000	3,370	0	0	0	100,000	102,198	67,198	2,500,000
2	46	100,000	6,740	0	0	0	200,000	213,869	143,869	2,500,000
3	47	100,000	10,110	0	0	0	300,000	335,427	260,927	2,500,000
4	48	100,000	13,480	0	0	0	400,000	467,797	393,297	2,500,000
5	49	100,000	16,850	0	0	0	500,000	612,010	537,510	2,500,000
6	50	0	16,850	0	0	0	500,000	659,828	589,053	2,500,000
7	51	0	16,850	0	0	0	500,000	711,459	645,154	2,500,000
8	52	0	16,850	0	0	0	500,000	767,257	706,167	2,500,000
9	53	0	16,850	0	0	0	500,000	827,578	772,448	2,500,000
10	54	0	16,850	0	0	0	500,000	892,823	844,398	2,500,000
11	55	0	16,850	0	0	0	500,000	963,473	922,498	2,500,000
12	56	0	16,850	0	0	0	500,000	1,040,048	1,007,268	2,500,000
13	57	0	16,850	0	0	0	500,000	1,123,108	1,099,268	2,500,000
14	58	0	16,850	0	0	0	500,000	1,213,329	1,199,174	2,500,000
15	59	0	16,850	0	0	0	500,000	1,311,468	1,311,468	2,500,000
16	60	0	16,850	0	0	0	500,000	1,418,351	1,418,351	2,500,000
17	61	0	16,850	0	0	0	500,000	1,534,977	1,534,977	2,500,000
18	62	0	16,850	0	0	0	500,000	1,662,474	1,662,474	2,500,000
19	63	0	16,850	0	0	0	500,000	1,802,130	1,802,130	2,500,000
20	64	0	16,850	0	0	0	500,000	1,955,453	1,955,453	2,500,000
21	65	0	16,850	0	0	0	500,000	2,125,195	2,125,195	2,550,235
22	66	0	16,850	0	0	0	500,000	2,309,400	2,309,400	2,748,186
23	67	0	16,850	0	0	0	500,000	2,509,282	2,509,282	2,960,953
24	68	0	16,850	0	0	0	500,000	2,726,177	2,726,177	3,189,627
25	69	0	16,850	0	0	0	500,000	2,961,520	2,961,520	3,435,364
26	70	0	16,850	0	0	0	500,000	3,216,891	3,216,891	3,699,425
27	71	0	16,850	0	0	0	500,000	3,494,923	3,494,923	3,949,263
28	72	0	16,850	0	0	0	500,000	3,797,933	3,797,933	4,215,706
29	73	0	16,850	0	0	0	500,000	4,128,571	4,128,571	4,500,143
30	74	0	16,850	0	0	0	500,000	4,489,880	4,489,879	4,804,171
		500,000	471,800	0	0	0				

*This is an example of an InsMark supplemental illustration for indexed universal life. In an actual presentation, this footnote will refer to an accompanying basic illustration from a specific life insurance company with important details, caveats, and guarantees. **See the accompanying supplemental report entitled "Loan-Based Split Dollar (Preface)" for remarks regarding loan interest rates used in this illustration.

The employer's loans must be repaid no later than the date specified in the plan documentation.

Insured: Frank Contini

Contini Brothers, Inc.

Promissory Note Analysis

Assumed Long-Term AFR for All Years Illustrated 3.37%** Promissory Note Interest Rate 3.37%

								Loan Collateral			
		(1) Beginning	(2) Annual Loan Interest	(3) Annual Loan Interest	(4) Loan Repayments	(5) Loan Repayments	(6) Year End	(7) Year End	(8) Year End	(9) Year End	
		of Year	Paid from	Paid from	from	from	Cumulative	Policy	Policy	Policy	
	Male	Loan to	Non-Policy	Policy	Non-Policy	Policy	Loan to	Accum	Cash	Death	
Year	Age	Executive	Values	Values	Values	Values	Executive	Value*	Value*	Benefit*	
31	75	0	16,850	0	0	0	500,000	4,885,382	4,885,381	5,129,651	
32	76	0	16,850	0	0	0	500,000	5,314,828	5,314,828	5,580,569	
33	77	0	16,850	0	0	0	500,000	5,780,954	5,780,954	6,070,001	
34	78	0	16,850	0	0	0	500,000	6,286,679	6,286,679	6,601,013	
35	79	0	16,850	0	0	0	500,000	6,835,120	6,835,119	7,176,875	
36	80	0	16,850	0	0	0	500,000	7,429,587	7,429,587	7,801,066	
37	81	0	16,850	0	0	0	500,000	8,073,577	8,073,577	8,477,256	
38	82	0	16,850	0	0	0	500,000	8,770,794	8,770,794	9,209,334	
39	83	0	16,850	0	0	0	500,000	9,525,122	9,525,122	10,001,380	
40	84	0	16,850	0	0	0	500,000	10,340,630	10,340,630	10,857,660	



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