## Executive Advantage

For: Loan Regime Split Dollar Client


## "Creating wealth comes down to discipline."

Presented By:
North American Company for Life and Health Insurance ${ }^{\circledR}$

## 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 that are associated with this form of split dollar are evidenced by a series of promissory notes between the employer and the executive, and the life insurance policy is assigned as security for the loans. The loans are typically term loans, i.e., they are due at the end of 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 each loan must bear interest equal to or greater than the Applicable Federal Rate (AFR) established under IRC Sections 7872(f)(2)(A) and 1274(d) at the inception of the loan.

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. As an additional benefit, the employer may choose to offset the executive's tax on any imputed loan interest by way of a bonus. ${ }^{1}$ Alternatively, loan interest may be accrued.

The AFR is determined by the length of the loan transaction, i.e., either the demand loan (blended annual rate), 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 paid is equal to or exceeds the Applicable Federal Rate, no interest is imputed by the IRS on the transaction.

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

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

1. If the executive is paying tax on imputed interest on the split dollar loan, a bonus ${ }^{1}$ can be paid from the employer to the executive to help pay this tax. Depending on the relative income tax brackets between the employer and the executive, this could be an attractive option and help reduce the impact of rising interest rates.
2. If the loan interest rate increases, the executive can be allowed to accrue the additional interest. Alternatively, the executive could also withdraw funds from his or her share of the policy values 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. The employer may want to require some form of custodianship for the reserved funds to be certain they are used for the intended purpose.

## AFRs in effect for August 2023

Long-term loans (over 9 years): 4.03\%
Mid-term loans (over 3 years; not over 9): 4.09\%
Short-term loans (3 years or less): 5.07\%
Demand loans (blended annual rate): $4.65 \%$

[^0]
## 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.

## Living Benefits for the Executive

The executive may, if the parties agree, have direct access to policy cash values in excess of the amount required to collateralize the loans from the employer.

If the loans have been repaid, the executive has free 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

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 Loan Receivable



## Executive's Values



## Preface (continued)

## Important Notes

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. Due to this you may want to establish your arrangement using long-term loans.
IRC Section 409A should not apply to this form of split dollar unless the employer is bound by the agreement between the parties to forgive the loan, waive payments, etc.

Policy loans reduce cash values and death benefits, and the lapse of a policy with loans could result in negative tax consequences. Be sure to consult with your own legal and tax advisers if you have any questions about this issue.
You should also consult with these advisers before entering into this or any other arrangement involving tax, legal, and economic considerations.

Care must be exercised if a hospital and a doctor employed by that hospital use this form of split dollar due to the Medicare-Medicaid Anti-Kickback Rule and the Stark II Rules. A plan should be able to be designed that complies with these rules; however, if this applies to you, be certain to consult with your legal and tax advisers on these issues.

## Illustration of Policy Values Funding the Plan

| Builder Plus IUL3 | Initial | Initial Policy |
| :---: | :---: | :---: |
| Interest Rate | Premium | Death Benefit |
| $5.91 \%$ | 200,000 | $2,626,758$ |


| Year | Male Age | (1) <br> Policy Premium | (2) <br> Net Policy Loan Proceeds | (3) <br> Year End Accum Value* | (4) <br> Year End <br> Surrender Value* | (5) <br> Death Benefit |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 200,000 | 0 | 186,983 | 104,240 | 2,826,758 |
| 2 | 46 | 200,000 | 0 | 381,728 | 303,122 | 3,026,758 |
| 3 | 47 | 200,000 | 0 | 585,238 | 510,769 | 3,226,758 |
| 4 | 48 | 200,000 | 0 | 797,618 | 731,424 | 3,426,758 |
| 5 | 49 | 200,000 | 0 | 1,019,301 | 961,381 | 3,626,758 |
| 6 | 50 | 200,000 | 0 | 1,250,748 | 1,201,102 | 3,826,758 |
| 7 | 51 | 200,000 | 0 | 1,492,449 | 1,451,077 | 4,026,758 |
| 8 | 52 | 200,000 | 0 | 1,745,229 | 1,712,132 | 4,226,758 |
| 9 | 53 | 200,000 | 0 | 2,009,948 | 1,985,125 | 4,426,758 |
| 10 | 54 | 200,000 | 0 | 2,286,900 | 2,270,351 | 4,626,758 |
| 11 | 55 | 200,000 | 0 | 2,612,354 | 2,612,354 | 4,826,758 |
| 12 | 56 | 200,000 | 0 | 2,956,330 | 2,956,330 | 5,026,758 |
| 13 | 57 | 200,000 | 0 | 3,320,214 | 3,320,214 | 5,226,758 |
| 14 | 58 | 200,000 | 0 | 3,705,191 | 3,705,191 | 5,426,758 |
| 15 | 59 | 200,000 | 0 | 4,112,517 | 4,112,517 | 5,626,758 |
| 16 | 60 | 200,000 | 0 | 4,551,545 | 4,551,545 | 5,917,009 |
| 17 | 61 | 200,000 | 0 | 5,015,103 | 5,015,103 | 6,419,331 |
| 18 | 62 | 200,000 | 0 | 5,503,721 | 5,503,721 | 6,934,688 |
| 19 | 63 | 200,000 | 0 | 6,018,513 | 6,018,513 | 7,462,956 |
| 20 | 64 | 200,000 | 0 | 6,560,549 | 6,560,549 | 8,003,870 |
| 21 | 65 | 0 | 4,390,000 | 7,023,252 | 2,396,193 | 3,800,843 |
| 22 | 66 | 0 | 390,000 | 7,525,389 | 2,237,411 | 3,667,234 |
| 23 | 67 | 0 | 390,000 | 8,069,474 | 2,084,886 | 3,537,392 |
| 24 | 68 | 0 | 390,000 | 8,658,703 | 1,939,889 | 3,411,868 |
| 25 | 69 | 0 | 390,000 | 9,296,161 | 1,803,474 | 3,290,859 |
| 26 | 70 | 0 | 390,000 | 9,985,216 | 1,676,866 | 3,174,648 |
| 27 | 71 | 0 | 390,000 | 10,731,096 | 1,563,037 | 2,958,080 |
| 28 | 72 | 0 | 390,000 | 11,539,223 | 1,465,031 | 2,734,346 |
| 29 | 73 | 0 | 390,000 | 12,414,287 | 1,385,032 | 2,502,318 |
| 30 | 74 | O | 390,000 | 13,362,561 | 1,326,670 | 2,262,048 |
|  |  | 4,000,000 | 7,900,000 |  |  |  |

*This illustration assumes the nonguaranteed values shown continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a proposal from North American Company.

This is an illustration, not a contract.

## Illustration of Policy Values Funding the Plan

| Year | Male Age | (1) <br> Policy Premium | (2) <br> Net Policy Loan Proceeds | (3) <br> Year End <br> Accum Value* | (4) <br> Year End Surrender Value* | (5) <br> Death <br> Benefit |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | 390,000 | 14,391,036 | 1,294,150 | 2,013,702 |
| 32 | 76 | 0 | 390,000 | 15,499,218 | 1,284,044 | 2,059,005 |
| 33 | 77 | 0 | 390,000 | 16,692,115 | 1,298,265 | 2,132,870 |
| 34 | 78 | 0 | 390,000 | 17,975,144 | 1,338,970 | 2,237,728 |
| 35 | 79 | 0 | 390,000 | 19,354,050 | 1,408,469 | 2,376,171 |
| 36 | 80 | 0 | 390,000 | 20,834,373 | 1,508,675 | 2,550,394 |
| 37 | 81 | 0 | 390,000 | 22,422,266 | 1,641,926 | 2,763,039 |
| 38 | 82 | 0 | 390,000 | 24,124,288 | 1,810,755 | 3,016,969 |
| 39 | 83 | 0 | 390,000 | 25,946,701 | 2,017,184 | 3,314,519 |
| 40 | 84 | 0 | 390,000 | 27,895,957 | 2,263,193 | 3,657,991 |
| 41 | 85 | 0 | 390,000 | 29,978,470 | 2,550,484 | 4,049,408 |
| 42 | 86 | 0 | 390,000 | 32,198,601 | 2,878,452 | 4,488,382 |
| 43 | 87 | 0 | 390,000 | 34,562,647 | 3,248,158 | 4,976,291 |
| 44 | 88 | 0 | 390,000 | 37,076,441 | 3,659,918 | 5,513,740 |
| 45 | 89 | 0 | 390,000 | 39,743,783 | 4,111,718 | 6,098,907 |
| 46 | 90 | 0 | 390,000 | 42,573,740 | 4,606,493 | 6,735,180 |
| 47 | 91 | 0 | 390,000 | 45,626,929 | 5,198,401 | 7,023,479 |
| 48 | 92 | 0 | 390,000 | 48,932,519 | 5,909,803 | 7,377,779 |
| 49 | 93 | 0 | 390,000 | 52,527,866 | 6,770,875 | 7,821,433 |
| 50 | 94 | 0 | 390,000 | 56,461,178 | 7,822,262 | 8,386,874 |
| 51 | 95 | 0 | 390,000 | 60,795,316 | 9,118,853 | 9,118,853 |
| 52 | 96 | 0 | 390,000 | 65,445,456 | 10,567,419 | 10,567,418 |
| 53 | 97 | 0 | 390,000 | 70,433,322 | 12,180,826 | 12,180,826 |
| 54 | 98 | 0 | 390,000 | 75,782,017 | 13,972,842 | 13,972,842 |
| 55 | 99 | 0 | 390,000 | 81,516,337 | 15,958,425 | 15,958,424 |

*This illustration assumes the nonguaranteed values shown continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a proposal from North American Company.

| 55 Year Summary |  |
| :--- | ---: |
| Cum. Payments | $4,000,000$ |
| Cum. Net Policy Loan Proceeds | $17,650,000$ |
| Surrender Value | $15,958,425$ |
| Death Benefit | $15,958,424$ |

This is an illustration, not a contract.

## Loan-Based Split Dollar Funded With Builder Plus IUL® 3 - Guideline Premium Test

Presented By: North American
Summary

The applicable federal rate provides short, mid, and long term rates that can be used for calculations.

Insured: Loan Regime Split Dollar Client
Employer: Company

Assumed Long-Term AFR for All Years Illustrated 4.03\%

Promissory Note InterestRate 4.03\%

*See appropriate Net Payment Analysis for details.
**This illustration assumes the nonguaranteed values shown continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a proposal from North American Company.

|  | Living Values ${ }^{\dagger}$ Death Benefit |  |
| :--- | ---: | ---: | ---: |
| Builder Plus IUL3: | $1,326,670$ | $2,262,048$ |
| Less Loan Repayment Due Employer: | $4,000,000$ | $4,000,000$ |
| Equals Executive's Net Value: | $-2,673,330$ | $-1,737,952$ |
| Plus Cumulative After Tax Cash Flow: | $7,900,000$ | $7,900,000$ |
| Equals Executive's Total Net Value: | $5,226,670$ | $6,162,048$ |

$\dagger$ Surrender value less employer's loans plus cum. net policy loans.

## Loan-Based Split Dollar Funded With Builder Plus IUL ${ }^{\circledR} 3$ - Guideline Premium Test

Presented By: North American
Insured: Loan Regime Split Dollar Client

## Summary

| Employer's | Executive's | Builder Plus IUL3 |
| :---: | :---: | :---: |
| Tax Bracket | Tax Bracket | Interest Rate |
| $21.00 \%$ | $37.00 \%$ | $5.91 \%$ |


| Employer |
| :--- |


| Executive |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| (5) <br> Net Payment* | (6) <br> Net Policy Loan Proceeds Available for Retirement Income | (7) <br> Year End Policy Accum Value** | (8) <br> Year End Policy Surrender Value** | (9) <br> Year End Policy Surrender Value** Net of Loan Due Employer | (10) <br> Year End Policy Death Benefit Net of Loan Due Employer |
| 59,644 | 390,000 | 14,391,036 | 1,294,150 | -2,705,850 | -1,986,298 |
| 59,644 | 390,000 | 15,499,218 | 1,284,044 | -2,715,956 | -1,940,995 |
| 59,644 | 390,000 | 16,692,115 | 1,298,265 | -2,701,735 | -1,867,130 |
| 59,644 | 390,000 | 17,975,144 | 1,338,970 | -2,661,030 | -1,762,272 |
| 59,644 | 390,000 | 19,354,050 | 1,408,469 | -2,591,531 | -1,623,829 |
| 59,644 | 390,000 | 20,834,373 | 1,508,675 | -2,491,325 | -1,449,606 |
| 59,644 | 390,000 | 22,422,266 | 1,641,926 | -2,358,074 | -1,236,961 |
| 59,644 | 390,000 | 24,124,288 | 1,810,755 | -2,189,245 | -983,031 |
| 59,644 | 390,000 | 25,946,701 | 2,017,184 | -1,982,816 | -685,481 |
| 59,644 | 390,000 | 27,895,957 | 2,263,193 | -1,736,807 | -342,009 |
| 59,644 | 390,000 | 29,978,470 | 2,550,484 | -1,449,516 | 49,408 |
| 59,644 | 390,000 | 32,198,601 | 2,878,452 | -1,121,548 | 488,382 |
| 59,644 | 390,000 | 34,562,647 | 3,248,158 | -751,842 | 976,291 |
| 59,644 | 390,000 | 37,076,441 | 3,659,918 | -340,082 | 1,513,740 |
| 59,644 | 390,000 | 39,743,783 | 4,111,718 | 111,718 | 2,098,907 |
| 59,644 | 390,000 | 42,573,740 | 4,606,493 | 606,493 | 2,735,180 |
| 59,644 | 390,000 | 45,626,929 | 5,198,401 | 1,198,401 | 3,023,479 |
| 59,644 | 390,000 | 48,932,519 | 5,909,803 | 1,909,803 | 3,377,779 |
| 59,644 | 390,000 | 52,527,866 | 6,770,875 | 2,770,875 | 3,821,433 |
| 59,644 | 390,000 | 56,461,178 | 7,822,262 | 3,822,262 | 4,386,874 |
| 59,644 | 390,000 | 60,795,316 | 9,118,853 | 5,118,853 | 5,118,853 |
| 59,644 | 390,000 | 65,445,456 | 10,567,419 | 6,567,419 | 6,567,418 |
| 59,644 | 390,000 | 70,433,322 | 12,180,826 | 8,180,826 | 8,180,826 |
| 59,644 | 390,000 | 75,782,017 | 13,972,842 | 9,972,842 | 9,972,842 |
| 59,644 | 390,000 | 81,516,337 | 15,958,425 | 11,958,425 | 11,958,424 |

[^1]2,713,802 17,650,000

Executive's 55 Year Summary

|  | Living $^{2}$ Values $^{\dagger}$ Death Benefit |  |  |
| :--- | ---: | ---: | ---: |
|  | $15,958,425$ | $15,958,424$ |  |
| Builder Plus IUL3: | $4,000,000$ | $4,000,000$ |  |
| Less Loan Repayment Due Employer: | $11,958,425$ | $11,958,424$ |  |
| Equals Executive's Net Value: | Plus Cumulative After Tax Cash Flow: | $17,650,000$ | $17,650,000$ |
| Equals Executive's Total Net Value: | $29,608,425$ | $29,608,424$ |  |

$\dagger$ Surrender value less employer's loans plus cum. net policy loans.
*See appropriate Net Payment Analysis for details.
**This illustration assumes the nonguaranteed values shown continue in all years. This is not likely, and actual results may be more or less favorable. This illustration is not valid unless accompanied by a proposal from North American Company.

Employer: Company

| Initial Policy | Assumed Long-Term AFR | Promissory Note |
| :---: | :---: | :---: |
| Death Benefit | for All Years Illustrated | InterestRate |
| $2,626,758$ | $4.03 \%$ | $4.03 \%$ | 4.03\%

This is an illustration, not a contract.

## Employer's Net Payment Analysis

Employer's
Tax Bracket
$21.00 \%$
Assumed Long-Term AFR
for All Years Illustrated
$4.03 \%^{*}$
Promissory Note
Interest Rate
$4.03 \%$

| Year | Male <br> Age | (1) <br> Beginning of Year Loan to Executive | (2) <br> Cumulative Loan to Executive | (3) <br> Employer's <br> Deemed Loan <br> Interest Income | (4) <br> Employer's <br> Deemed Loan <br> Interest Expense | (5) <br> Employer's <br> Net <br> Payment $(1)+(3)-(4)$ | (6) <br> Employer's Annual Charge to Earnings (5)-(1) | (7) <br> Employer's Cumulative Charge to Earnings |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 200,000 | 200,000 | 8,060 | 8,060 | 200,000 | 0 | 0 |
| 2 | 46 | 200,000 | 400,000 | 16,120 | 16,120 | 200,000 | 0 | 0 |
| 3 | 47 | 200,000 | 600,000 | 24,180 | 24,180 | 200,000 | 0 | 0 |
| 4 | 48 | 200,000 | 800,000 | 32,240 | 32,240 | 200,000 | 0 | 0 |
| 5 | 49 | 200,000 | 1,000,000 | 40,300 | 40,300 | 200,000 | 0 | 0 |
| 6 | 50 | 200,000 | 1,200,000 | 48,360 | 48,360 | 200,000 | 0 | 0 |
| 7 | 51 | 200,000 | 1,400,000 | 56,420 | 56,420 | 200,000 | 0 | 0 |
| 8 | 52 | 200,000 | 1,600,000 | 64,480 | 64,480 | 200,000 | 0 | 0 |
| 9 | 53 | 200,000 | 1,800,000 | 72,540 | 72,540 | 200,000 | 0 | 0 |
| 10 | 54 | 200,000 | 2,000,000 | 80,600 | 80,600 | 200,000 | 0 | 0 |
| 11 | 55 | 200,000 | 2,200,000 | 88,660 | 88,660 | 200,000 | 0 | 0 |
| 12 | 56 | 200,000 | 2,400,000 | 96,720 | 96,720 | 200,000 | 0 | 0 |
| 13 | 57 | 200,000 | 2,600,000 | 104,780 | 104,780 | 200,000 | 0 | 0 |
| 14 | 58 | 200,000 | 2,800,000 | 112,840 | 112,840 | 200,000 | 0 | 0 |
| 15 | 59 | 200,000 | 3,000,000 | 120,900 | 120,900 | 200,000 | 0 | 0 |
| 16 | 60 | 200,000 | 3,200,000 | 128,960 | 128,960 | 200,000 | 0 | 0 |
| 17 | 61 | 200,000 | 3,400,000 | 137,020 | 137,020 | 200,000 | 0 | 0 |
| 18 | 62 | 200,000 | 3,600,000 | 145,080 | 145,080 | 200,000 | 0 | 0 |
| 19 | 63 | 200,000 | 3,800,000 | 153,140 | 153,140 | 200,000 | 0 | 0 |
| 20 | 64 | 200,000 | 4,000,000 | 161,200 | 161,200 | 200,000 | 0 | 0 |
| 21 | 65 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 22 | 66 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 23 | 67 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 24 | 68 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 25 | 69 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 26 | 70 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 27 | 71 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 28 | 72 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 29 | 73 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 30 | 74 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
|  |  | 4,000,000 |  | 3,304,600 | 3,304,600 | 4,000,000 | 0 |  |

*See Preface for notes regarding loan interest rates.

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.

## Employer's Net Payment Analysis

Employer's
Tax Bracket
$21.00 \%$

|  |  | (1) | (2) | (3) | (4) | (5) | (6) | (7) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Year | Male <br> Age | Beginning of Year Loan to Executive | Cumulative Loan to Executive | Employer's Deemed Loan Interest Income | Employer's Deemed Loan Interest Expense | Employer's <br> Net <br> Payment $(1)+(3)-(4)$ | Employer's Annual Charge to Earnings (5)-(1) | Employer's Cumulative Charge to Earnings |
| 31 | 75 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 32 | 76 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 33 | 77 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 34 | 78 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 35 | 79 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 36 | 80 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 37 | 81 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 38 | 82 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 39 | 83 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 40 | 84 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 41 | 85 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 42 | 86 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 43 | 87 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 44 | 88 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 45 | 89 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 46 | 90 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 47 | 91 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 48 | 92 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 49 | 93 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 50 | 94 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 51 | 95 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 52 | 96 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 53 | 97 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 54 | 98 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |
| 55 | 99 | 0 | 4,000,000 | 161,200 | 161,200 | 0 | 0 | 0 |

*See Preface for notes regarding loan interest rates.

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.

## Executive's Net Payment Analysis

Executive's
Tax Bracket
$37.00 \%$
Assumed Long-Term AFR
for All Years Illustrated
$4.03 \%^{*}$
Promissory Note
Interest Rate
$4.03 \%$

| Year | Male Age | (1) <br> Policy Premium Due by Executive | (2) <br> Beginning of Year Loan from Employer | (3) <br> Cumulative <br> Loan Due <br> Employer | (4) <br> Executive's <br> Split Dollar <br> Imputed <br> Loan <br> Interest | (5) <br> Income Tax <br> on <br> Split Dollar <br> Imputed <br> Loan <br> Interest | (6) <br> Payment Due by Executive (1)-(2)+(5) | (7) <br> Net Policy Loan Proceeds Available for Retirement Income |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 45 | 200,000 | 200,000 | 200,000 | 8,060 | 2,982 | 2,982 | 0 |
| 2 | 46 | 200,000 | 200,000 | 400,000 | 16,120 | 5,964 | 5,964 | 0 |
| 3 | 47 | 200,000 | 200,000 | 600,000 | 24,180 | 8,947 | 8,947 | 0 |
| 4 | 48 | 200,000 | 200,000 | 800,000 | 32,240 | 11,929 | 11,929 | 0 |
| 5 | 49 | 200,000 | 200,000 | 1,000,000 | 40,300 | 14,911 | 14,911 | 0 |
| 6 | 50 | 200,000 | 200,000 | 1,200,000 | 48,360 | 17,893 | 17,893 | 0 |
| 7 | 51 | 200,000 | 200,000 | 1,400,000 | 56,420 | 20,875 | 20,875 | 0 |
| 8 | 52 | 200,000 | 200,000 | 1,600,000 | 64,480 | 23,858 | 23,858 | 0 |
| 9 | 53 | 200,000 | 200,000 | 1,800,000 | 72,540 | 26,840 | 26,840 | 0 |
| 10 | 54 | 200,000 | 200,000 | 2,000,000 | 80,600 | 29,822 | 29,822 | 0 |
| 11 | 55 | 200,000 | 200,000 | 2,200,000 | 88,660 | 32,804 | 32,804 | 0 |
| 12 | 56 | 200,000 | 200,000 | 2,400,000 | 96,720 | 35,786 | 35,786 | 0 |
| 13 | 57 | 200,000 | 200,000 | 2,600,000 | 104,780 | 38,769 | 38,769 | 0 |
| 14 | 58 | 200,000 | 200,000 | 2,800,000 | 112,840 | 41,751 | 41,751 | 0 |
| 15 | 59 | 200,000 | 200,000 | 3,000,000 | 120,900 | 44,733 | 44,733 | 0 |
| 16 | 60 | 200,000 | 200,000 | 3,200,000 | 128,960 | 47,715 | 47,715 | 0 |
| 17 | 61 | 200,000 | 200,000 | 3,400,000 | 137,020 | 50,697 | 50,697 | 0 |
| 18 | 62 | 200,000 | 200,000 | 3,600,000 | 145,080 | 53,680 | 53,680 | 0 |
| 19 | 63 | 200,000 | 200,000 | 3,800,000 | 153,140 | 56,662 | 56,662 | 0 |
| 20 | 64 | 200,000 | 200,000 | 4,000,000 | 161,200 | 59,644 | 59,644 | 0 |
| 21 | 65 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 4,390,000 |
| 22 | 66 | 0 |  | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 23 | 67 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 24 | 68 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 25 | 69 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 26 | 70 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 27 | 71 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 28 | 72 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 29 | 73 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 30 | 74 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
|  |  | 4,000,000 | 4,000,000 |  | 3,304,600 | 1,222,702 | 1,222,702 | 7,900,000 |

*See Preface for notes regarding loan interest rates.

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.

## Executive's Net Payment Analysis

Executive's
Tax Bracket
$37.00 \%$
Assumed Long-Term AFR
for AllYears Illustrated
$4.03 \%^{*}$
Promissory Note
Interest Rate
$4.03 \%$

| Year | Male Age | (1) <br> Policy Premium Due by Executive | (2) <br> Beginning of Year Loan from Employer | (3) <br> Cumulative <br> Loan Due <br> Employer | (4) <br> Executive's <br> Split Dollar <br> Imputed <br> Loan <br> Interest | (5) <br> Income Tax on Split Dollar Imputed Loan Interest | (6) <br> Payment Due by Executive $(1)-(2)+(5)$ | (7) <br> Net Policy Loan Proceeds Available for Retirement Income |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 31 | 75 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 32 | 76 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 33 | 77 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 34 | 78 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 35 | 79 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 36 | 80 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 37 | 81 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 38 | 82 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 39 | 83 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 40 | 84 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 41 | 85 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 42 | 86 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 43 | 87 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 44 | 88 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 45 | 89 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 46 | 90 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 47 | 91 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 48 | 92 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 49 | 93 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 50 | 94 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 51 | 95 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 52 | 96 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 53 | 97 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 54 | 98 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |
| 55 | 99 | 0 | 0 | 4,000,000 | 161,200 | 59,644 | 59,644 | 390,000 |

$\overline{4,000,000} \overline{4,000,000} \quad \overline{7,334,600} \overline{2,713,802} \overline{2,713,802} \quad \overline{17,650,000}$
*See Preface for notes regarding loan interest rates.

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.

## Loan-Based Split Dollar Funded With Builder Plus IUL ${ }^{\circledR} 3$ - Guideline Premium Test

## Employer's 55 Year Analysis



|  | At Year 55 |
| ---: | :--- |
| Employer's Cumulative Net Payments | $\$ 4,000,000$ |
| Cumulative Charge to Earnings | $\$ 0$ |
| Loans Due Employer from Executive | $\$ 4,000,000$ |

## Loan-Based Split Dollar Funded With Builder Plus IUL ${ }^{\circledR} 3$ - Guideline Premium Test

Presented By: North American
Executive's 55 Year Analysis

Insured: Loan Regime Split Dollar Client
Employer: Company



[^2]Indexed universal life insurance products are not an investment in the "market" or in the applicable index and are subject to all policy fees and charges normally associated with most universal life insurance.

The information presented is hypothetical and not intended to project or predict investment results. Illustrations are not complete unless all pages are included. This illustration is not valid unless accompanied by a proposal from North American Company for Life and Health Insurance ${ }^{\circledR}$. InsMark Illustration August 31, 2023.

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In some situations loans and withdrawals may be subject to federal taxes. North American Company does not give tax or legal advice. Clients should be instructed to consult with and rely on their own tax advisor or attorney for advice on their specific situation. Income and growth on accumulated cash values is generally taxable only upon withdrawal. Adverse tax consequences may result if withdrawals exceed premiums paid into the policy. Withdrawals or surrenders made during a Surrender Charge period will be subject to withdrawal charges, processing fees, or surrender charges, and may reduce the ultimate death benefit and cash value. Surrender charges vary by product, issue age, sex, underwriting class, and policy year.

Builder Plus IUL 3 (policy form series LS191) or state variation, including all applicable endorsements and riders, is issued by North American Company for Life and Health Insurance, West Des Moines, IA. Products, features, riders, endorsement or issue ages may not be available in all jurisdictions. Restrictions or limitations may apply.

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[^0]:    ${ }^{1}$ When using a bonus to assist with the payment of tax on imputed loan interest, care must be taken not to have the executive use these bonus payments to make loan interest payments (or loan repayments) back to the employer. This restriction complies with the prohibition against the employer making such payments as provided in the split-dollarfinal regulations issued in 2003 (TD 9092, 9/11/03 and Rev. Rul. 2003-105). Bonuses used to offset the income tax on imputed income should be acceptable.

[^1]:    4,000,000

[^2]:    ${ }^{1}$ For retirement income.

