

## **INSTRUCTIONS FOR CUSTOMIZING YOUR SEC COMMENT LETTER**

1 National Benefits Group LLC

2. Our business, including but not limited to:

- Title. **Norman Winer CEO**
- Years of sales experience. **45 Years**
- Specific nature of business **Executive nonqualified benefits**
- **NBG's sales includes, variable life insurance, variable annuities, etc.**
- Variable Life Insurance products are often preferred by clients because policy cash values are **not tied to insurance company guarantees**
- Most variable life insurance products wrap insurance company investments sold with a required prospectus that help insurance agents efforts to comply with laws and rules that govern our business. **IR 409A has been most helpful to put our clients more at ease as to our plans' acceptance by both the IRS and SEC**

3. Obligations of a life insurance producer include:

- Regulator and carrier compliance requirements including: **annual and monthly advisories regarding security trading and rules**
- Licensing obligations that include **special security licenses** and training requirements **are required at least annually**
- Supervisory and audit requirements and experiences **Annually**
- Effectiveness of new standard in protecting investors Any new standards **should not include those securities people only selling life insurance products**

Consumers' access to professional financial advice

Broader industry/economic impact

### **SUBMITTING YOUR LETTER**

When you have finalized your comments, you can submit your letter electronically or by mail.

To submit electronically, send an email to [rule-comments@sec.gov](mailto:rule-comments@sec.gov) and include 'File Number 4-606' in the subject line.

To send by mail, include your comments letter in triplicate and send to the following address, again referring to File Number 4-606:

**Elizabeth M. Murphy**  
**Secretary**  
**Securities and Exchange Commission**  
**100 F Street NE**

**Washington, DC 20549-1090**

*Please send a copy of your letter to AALU after submitting to the SEC.* You can send via email to Chris Morton ([morton@aalu.org](mailto:morton@aalu.org)), Tom Korb ([korb@aalu.org](mailto:korb@aalu.org)), or Anthony Raglani ([raglani@aalu.org](mailto:raglani@aalu.org)). You can also send a hard copy of the letter, should you chose to do so, using the address below:

**AALU**

**101 Constitution Avenue NW  
Suite 703 East  
Washington, DC 20001**