

A BANNER AND WILLIAM PENN GENERAL AGENCY COMMUNICATION

ANTI-MONEY LAUNDERING TRAINING PART OF UL POLICY ISSUE REQUIREMENTS

TO: ALL BANNER AND WILLIAM PENN GENERAL AGENTS
FROM: HANK CUSHARD, VICE PRESIDENT, MARKETING
DATE: JUNE 30, 2009

The USA Patriot Act requires anti-money laundering (AML) training for certain insurance producers. Under the rules, insurance producers -- including independent agents -- who sell products that accumulate cash value or have an investment component must be trained to understand and detect possible money laundering activities. This AML training must be completed on an on-going basis.

In their continuing efforts to satisfy requirements under the USA Patriot Act, Banner and William Penn will require agent certification of on-going AML training before issuing a universal life product. Banner and William Penn have partnered with LIMRA to allow eligible producers to take the on-going AML training course at no cost.

Beginning July 1, 2009, all agents who completed LIMRA's "Anti-Money Laundering for Insurance Producers" course are required to complete the AML on-going training course every two years. To determine if the agent has taken AML Base Course within the last two years please visit the LIMRA website at <https://aml.limra.com>. If required, the "2009 Anti-Money Laundering for Insurance" on-going training course will automatically be assigned through LIMRA. The on-going training course will take approximately 30 minutes to complete and must be completed prior to issuance of any universal life policy.

Logging in takes only a few moments. Enter the Username which is the first four characters of the agent's last name together with the last 6 digits of the agent's SSN, and then enter the password established when taking the initial AML training course with LIMRA. (If the agent has forgotten his/her password click on "Forgot your password?" and follow the prompts to reset the password.) If an agent is unable to log-on, please contact the LIMRA AML help desk at support@cfmpartners.com or 866-364-2380.

If an agent successfully takes the AML on-going LIMRA training course for another carrier, he or she does not have to retake the course for Banner or William Penn. Just review the Banner and William Penn specific page with our AML contact information and LIMRA will notify us that the agent has successfully completed the course. A paper certification is not available. Certification is handled electronically between LIMRA and Banner and William Penn.

If you require additional information, please contact the Legal & General America compliance officer at 301.294.6968 or BannerAMLCompliance@lgamerica.com or WilliamPennAMLCompliance@lgamerica.com.