Sales Guide and Product Training for

LibertyMark℠

Single Premium Deferred Fixed Indexed Annuities

Issued by Americo Financial Life and Annuity Insurance Company, Kansas City, MO
Distributed by Legacy Marketing Group®

As of June 23, 2014

Some products and benefits may not be available in all states or for all periods. Certain restrictions apply. Consult policy and endorsements for all limitations and exclusions.

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For further information, please see the resources listed at the back of this guide or refer to www.legacynet.com. Visit the secure site regularly at www.legacynet.com for the most current LibertyMark Sales Guide and Product Training.

For product questions and effective sales ideas, call
Legacy’s Sales Team
800-395-1053, Ext. 4002
Producer’s Guide for Annuity Suitability

The appropriate sale of our products is something that Americo takes seriously. We have adopted nationwide suitability requirements, which are in-line with the NAIC Model Regulation on Suitability in Annuity Transactions. As a Producer, it is your responsibility to carefully consider the suitability of each sale you make.

Suitability Review
It is very important that you carefully consider the suitability of your recommendation. Before recommending a product to a consumer, gather information and carefully consider and discuss the client’s needs. You should not have a “cookie cutter” approach to recommending products. A decision to recommend a fixed annuity to your client should be based on a careful review of the information gathered during the sale. It is also important that your client understands the product and all of the features before making the purchase.

Although there are no “right” or “wrong” questions to ask each customer, below is a list of sample questions you may find helpful when doing a suitability analysis:

- What is the client’s main financial objective?
- How will the purchase of this annuity help achieve this objective?
- Will the consumer have adequate liquid assets/income for current and future needs?
- Does the consumer understand how the annuity works and the associated surrender period/charges?
- If the client was a close friend or family member, would you make the same recommendation?
- If replacement is involved, is it beneficial to the client to replace the current policy? Consider surrender charges period, rates, riders, benefits, etc.

We require the use of the Financial Suitability Form for all annuity sales. Please keep in mind, simply completing the suitability form does not alleviate your responsibility in making a suitable recommendation. It is your responsibility to be familiar with the customer’s needs and make recommendations that are appropriate for individual customers.

Internal Suitability Review Guidelines
Our Internal Suitability Review Guidelines comply with the Suitability in Annuity Transactions Model Regulation. A variety of factors will be reviewed, including liquid assets, sources of funds, age, and monthly disposable income.

Americo reviews each case individually; however, the following are examples of some basic guidelines:

- Clients with annual income levels below $20,000 are given extra scrutiny in the review process. Clients will need to have adequate emergency funds in liquid assets and meet monthly living expenses.
- Clients over age 75 purchasing an annuity will be given extra scrutiny in the review process. Older consumers will need more liquid assets because the consumer is likely not
working and does not have working income to meet reasonably foreseeable emergency needs. Producers should provide a detailed explanation of the reason for purchase. If replacing, Americo will need to determine the benefit of the replacement transaction.

We will **automatically decline** cases that include the following:

- Client resides in a nursing home.
- Client is left with little to no liquid assets for emergencies.
- Source of funding is a reverse mortgage or home equity loan.
- Close to 100% of client’s net worth is annuities.
- Undisclosed replacements.

In the case of Americo products that allow for additional premiums, if new premium is received more than 90 days after an annuity is issued, or the source of additional funds involves a replacement (regardless of timeframe), we will require a new suitability form to be completed and a new suitability review will be conducted within the first policy year.

**Replacements and Suitability**

**What are Replacements?**
The definition of “replacement” according to the NAIC Life Insurance and Annuities Replacement Model Regulation is:

A transaction in which a new policy or contract is to be purchased, and it is known or should be known to the proposing Producer, or to the proposing insurer if there is no Producer, that by reason of the transaction, an existing policy or contract has been or is to be:

1. Lapsed, forfeited, surrendered or partially surrendered, assigned to the replacing insurer or otherwise terminated;
2. Converted to reduced paid-up insurance, continued as extended term insurance, or otherwise reduced in value by the use of non-forfeiture benefits or other policy values;
3. Amended so as to effect either a reduction in benefits or in the term for which coverage would otherwise remain in force or for which benefits would be paid;
4. Reissued with any reduction in cash value; or
5. Used in a financed purchase.

Replacements include “financed purchases,” which according to the NAIC Model regulation, means the purchase of a new policy involving the actual or intended use of monies obtained by the withdrawal or surrender of, or by borrowing from values of, an existing policy to pay all or part of any premium due on the new policy.

Americo considers it to be a “financed purchase” if any of the above transactions are processed on an existing life insurance or annuity contract, either four months before or 13 months after the issue date of the new policy.
Replacement Requirement Guidelines
Each replacement case will be reviewed individually; however, you should consider these guidelines:

- A “like-to-like” replacement (fixed annuity to fixed annuity) requires a close review by our suitability team. We will consider surrender charge periods and charges, product enhancements, and rate comparisons, among other factors, in looking for an apparent benefit for your client.
- We will not accept undisclosed replacements and, when identified, the application will be rejected.

It is very important that you carefully consider the suitability of any replacement and ensure your client understands the advantages, disadvantages, and potential impact, of a replacement. Factors to consider include guaranteed interest rates, loss of existing benefits, potential surrender charges on the existing annuity contract or life insurance policy, and the new surrender charge period of the replacement.

Before you recommend a replacement to your client, you must be sure the replacement provides an economic benefit to your client. Below are some things to consider before recommending a replacement sale:

- How do the benefits of the existing product compare with those of the Amerio annuity you are recommending, including rates, surrender charges, riders, etc.?
- Will the new annuity better fit your client’s needs and financial objectives?
- Will your client lose any existing benefits?
- Has your client had other annuity replacements within the past three years?

Completing the Financial Suitability Form
The Financial Suitability Form [(AAA8378 (12/11)] should be used for all annuity sales. The suitability form should be completed and signed by the applicant during the sale. When completing the form, please keep the following in mind:

General requirements:
- Complete and accurate information must be provided. If subsequent changes are made to the Financial Suitability Form, documentation of these changes may be required. This may include providing copies of bank records, annual statements, or other financial documentation.
- If you are replacing an annuity, please carefully verify the surrender charges that will be assessed.
- A detailed summary should be provided by the Producer in the Acknowledgment section.
- Provide as much detail as possible regarding your suitability review of the sale. If the annuity is a replacement, it is important that you include the factors that you believe make it a suitable replacement. Some questions to consider and address include: Why does the new annuity deliver a substantial value to the client? How does it provide a benefit not available with the client’s current product?
• Regardless if a trust is involved, if the owner/annuitant are different, provide a suitability form for the person funding the annuity.

Replacement section:
• Provide as much detail as possible regarding the replaced product. This will decrease the likelihood we will need to contact you or your client for additional information.
• Give a detailed Producer statement regarding the suitability of the replacement. Give specific reasons as to why you are recommending the replacement. Attach an additional page if necessary.

A New Business representative may contact you or the client to obtain additional information if the representative has questions as a result of their review of the annuity application and suitability form.

Suitability Calls
Americo conducts suitability calls with all applicants ages 65+ before the issuance of an annuity. It is important that you provide a current phone number for your client and let them know that Americo will be contacting them to ask a few questions about the annuity purchase. If your client is available during a certain time, please make note of this on the application. The phone call will be completed by an Americo associate. It is a short phone interview and reviews the client’s understanding of certain features of the annuity.

Instructions for Trusts as Owners
If a trust is listed as an owner of a proposed annuity, Americo has specific requirements as to what information should be collected on the Suitability Form (AAA8378):

• The Grantor/Settlor and Trustee are the same: The grantor/settlor of the trust must complete the Suitability Form with his/her own personal information. If there are multiple non-spousal grantors/settlors, a separate Suitability Form must be completed for each individual.
• The Grantor/Settlor and Trustee are different: The grantor/settlor of the trust must complete a Suitability form with his/her own personal information. Additionally, the trustee must complete the Suitability Form with the trust’s information (annuity objectives, financial status, etc.) including the following modifications:
  o For name of owner, enter the name of the trust.
  o For “age,” enter “N/A.”

For “owner’s signature,” the trustee must sign as trustee (John Doe, TTEE).

Additional Information for Agents Selling Annuities in Iowa
The Iowa Department of Insurance has received questions regarding where the line is drawn when providing insurance advice. To answer these questions, Iowa Insurance Bulletin 11-4 was issued to provide guidance so insurance Producers have a better understanding of the types of activities and conduct that are within the scope of permissible activities and the types of activities and conduct that are beyond the scope of permissible activities. The answers to these questions have become increasingly important because suitability laws at the state and federal
level have evolved to the point where any recommendation to a consumer of either an insurance product or a securities product requires an extensive financial analysis of the consumer’s financial affairs and a discussion of broad financial trends. How information received from the consumer is applied will be different depending on whether it is an insurance transaction or a securities transaction because of the differing requirements of insurance and securities laws.

**Examples of Permitted Activities for an “Insurance Only” Person**
- May discuss with the consumer the consumer’s risk tolerance, financial situation, and needs.
- May discuss with the consumer the stock market in general terms, including market risks and recent or historic economic activities that are generally known to the public and regularly discussed with public media.
- An Insurance-Only Person may provide advice as part of a financial plan. When doing so, an Insurance-Only Person should clearly identify himself or herself as an individual who holds an Iowa insurance license and explain that such license authorizes the person to discuss how annuities or life insurance products may fit into the consumer’s financial plan and that he or she is authorized to sell annuity or life insurance products and not sell, recommend, or provide advice about securities.
- An Insurance-Only Person may have general discussions about balancing risk, diversification, etc., that support an insurance position within a consumer’s financial plan.

**Examples of Prohibited Activities for an “Insurance-Only” Person**
- Discussing risks specific to the consumer’s individual securities portfolio.
- Recommending the liquidation of specific securities, or identifying specific securities that could be used to fund an annuity or life insurance product.
- Recommending specific allocations, in dollars or percentages, between insurance and securities products.
- Completing securities forms, except for: (1) providing general information to the consumer related to the consumer’s existing or new annuity or life insurance product; (2) assisting with forms that are required by the insurance company to complete an insurance transaction; and (3) assisting with forms that are required by Iowa insurance regulations.

For complete details, please review the entire bulletin at: http://www.iid.state.ia.us/sites/default/files/commissioners_bulletins/2011/06/24/bulletin_11_4_re_insuranceLicensed_persons_june_2_62714.pdf.
Tips for Completing the Financial Suitability Form

Because it is important for us to understand your recommendation and how it fits the client’s needs and situation, it is important that you carefully and thoroughly complete the Financial Suitability Form [AAA8378 (11/13)]. Florida residents, please complete form DFS-HI-1980. If responses are missing or conflicting, it is likely we will need to request additional information.

Liquid assets are those that are not subject to penalty or surrender charges, or can easily be converted into cash. You can include penalty-free withdrawals from annuities. Since annuities are long-term contracts, it is important to include all assets in this section so we can understand the applicant’s ability to meet living expenses and emergencies.

Monthly gross income and monthly living expenses should be total household income and expenses.

If the owner is a trust, please see our guidelines on Page 3 of this document for how to complete the suitability form.

Please indicate best time to call for all clients age 65+ so we can complete the suitability call.
15. Federal Income Tax Bracket: .................................................. □ 0% □ 10% □ 15% □ 25% □ 28% □ 33% □ 35%

16. Does your income cover all your living expenses (including out-of-pocket medical expenses)? .......................................................... □ Yes □ No

17. Is your income sufficient to cover future changes in your living expenses (including out-of-pocket medical expenses and/or nursing home expenses) during the surrender charge period? .................................................................................. □ Yes □ No

If No to question 16 or 17 above, explain:

18. Do you anticipate any substantial change in your future income, liquid assets, or expenses (including out-of-pocket medical expenses) during the surrender charge period? .......................................................... □ Yes □ No

If Yes, explain:

19. Do you understand that the proposed annuity has a surrender charge and the length of the surrender charge period? ...................... □ Yes □ No

20. Are you currently residing in a nursing home? ........................................ □ Yes □ No

21. Are you currently residing in an assisted living facility? ........................ □ Yes □ No

22. Do you have Long-Term Care insurance? ........................................... □ Yes □ No

23. Do you have Medicare Supplement insurance? .................................. □ Yes □ No

SOURCE OF FUNDS

22. Source of this annuity's funding (check all that apply):

☐ Variable annuity ☐ Fixed/Indexed annuity ☐ Life Insurance ☐ Stocks/Bonds/Mutual Funds

☐ Checking/Savings ☐ CD ☐ 401(k)/(403(b)/Pension ☐ Inheritance

☐ Reverse Mortgage ☐ Home Equity Loan ☐ Death Claim Proceeds ☐ Required Minimum Distribution

☐ Other:

23. Will the annuity applied for replace, or otherwise reduce in value, any existing life insurance or annuity now in force? If Yes, please complete the Replacement section below. .......................................................... □ Yes □ No

24. Within the past 36 months (60 months in CA and MN), other than the current transaction, have you had another annuity exchanged or replaced? .................................................................................. □ Yes □ No

If Yes, provide details:

REPLACEMENT SECTION—MUST BE COMPLETED IF QUESTION #23 IS ANSWERED “YES”.

Life and annuities:

25. Is your current agent the same agent who recommended the purchase of the existing annuity or life insurance contract? .............. □ Yes □ No

26. Do you feel you have been reasonably informed of the various features of the proposed annuity and understand the differences between your existing contract(s) and the proposed annuity? .................................................................................. □ Yes □ No

Life only:

27. Death Benefit Amount ........................................................................................................... $

28. Cash Surrender Value ........................................................................................................... $

29. Please explain why you are replacing a life insurance policy with an annuity:

Annuities only (complete Annuity to Annuity Product Features Comparison grid below):

30. Are you using the penalty-free withdrawal from your current annuity to fund the proposed annuity? .................................................. □ Yes □ No

31. Please explain how this new annuity better meets your objectives

If replacing: please have the client explain how this new annuity better meets their needs.
If replacing: carefully and thoroughly complete the annuity comparison section, including the correct information for the proposed Americo product. We must be able to determine that the client will receive a substantial economic net benefit after this replacement.

<table>
<thead>
<tr>
<th>Components</th>
<th>Existing Annuity Contract #1</th>
<th>Existing Annuity Contract #2</th>
<th>Proposed Annuity Contract</th>
</tr>
</thead>
<tbody>
<tr>
<td>Issuing company:</td>
<td></td>
<td></td>
<td>Americo Financial Life and Annuity Insurance Company</td>
</tr>
<tr>
<td>Type of contract:</td>
<td>Fixed</td>
<td>Variable</td>
<td>Fixed</td>
</tr>
<tr>
<td>Date of issue:</td>
<td></td>
<td></td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Source of initial funding (i.e. cash, annuity, mutual fund, etc.):</td>
<td></td>
<td>Annuity</td>
<td></td>
</tr>
<tr>
<td>Is there a surrender charge?</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Surrender charge period remaining:</td>
<td>_____ years</td>
<td>_____ years</td>
<td>_____ years</td>
</tr>
<tr>
<td>Surrender charge:</td>
<td>$</td>
<td>$</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Market Value Adjustment (MVA):</td>
<td>(+/-)$</td>
<td>(+/-)$</td>
<td>Platinum Assure only</td>
</tr>
<tr>
<td>Fees or other charges:</td>
<td></td>
<td></td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Enhanced benefits (guaranteed income benefits, guaranteed withdrawal rider, etc.):</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Surrender charge on death benefit:</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Penalty-free withdrawal % available:</td>
<td></td>
<td></td>
<td>No</td>
</tr>
<tr>
<td>Current declared interest rate %:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Guaranteed minimum declared interest rate % (not guaranteed minimum value):</td>
<td></td>
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Americo Financial Life and Annuity Insurance Company • Home Office: Dallas, Texas • Administrative Office: PO BOX 410286, Kansas City, MO 64141-0286 • www.americo.com

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It is required that you complete this section. If it is not completed, the form will be returned for completion. Please provide a detailed summary of your recommendation and include any information you feel would be helpful in our review process. You may attach an additional page if more space is needed.
LibertyMark Overview

LibertyMark fixed indexed annuities respond to your clients’ needs for higher growth potential and the security of a highly rated carrier and strong guarantees. A range of interest crediting choices that respond to multiple market conditions make LibertyMark a full-service allocation tool. Seven- and 10-year products are available (an optional bonus is available on the 10-year products).

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<th>A Quick Look at LibertyMark</th>
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<td><strong>Highlights</strong></td>
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<tr>
<td>1. Seven- or 10-year surrender charge schedule.</td>
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<td>2. Optional dual bonus on 10-year products: 5% upfront and 10% persistency, payable at the end of Year 10 (8% in lower-surrender-charge states).</td>
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<tr>
<td>3. Multiple interest crediting strategies, including choices unavailable elsewhere.</td>
</tr>
<tr>
<td>4. Index gains vest to date proof of death requirements are received.</td>
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<tr>
<th>Products</th>
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<tbody>
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<td>1. LibertyMark 7.</td>
</tr>
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<td>2. LibertyMark 10.</td>
</tr>
<tr>
<td>3. LibertyMark 10 LT (available in lower-surrender-charge states).</td>
</tr>
<tr>
<td>4. LibertyMark 10 Plus (with bonus).</td>
</tr>
<tr>
<td>5. LibertyMark 10 LT Plus (with bonus—available in lower-surrender-charge states).</td>
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<td>2. $2,000 minimum qualified.</td>
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<td>3. $50 minimum interest crediting strategy allocation.</td>
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<td>4. $1 million maximum premium per owner without Home Office approval.</td>
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<th>Bonus</th>
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<td>See details on Page 13.</td>
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<tr>
<td>1. Dual bonus on LibertyMark 10 Plus products:</td>
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<td>2. 5% upfront.</td>
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<tr>
<td>3. 10% persistency after 10 years (8% in lower-surrender-charge states).</td>
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<th>Markets</th>
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<td>2. Traditional IRA.</td>
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<td>3. Roth IRA.</td>
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<td>4. Inherited IRA.</td>
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<td>5. SEP IRA.</td>
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<td>6. Non-contributory TSA plans.</td>
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<th>Issue Ages</th>
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<tr>
<td>1. 0–85, LibertyMark 7, 10, and 10 LT.</td>
</tr>
<tr>
<td>2. 0–80, LibertyMark 10 Plus and 10 LT Plus.</td>
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<tr>
<td>3. No owner may be over the maximum issue age.</td>
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<table>
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<tr>
<th>Interest Crediting Strategies</th>
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<td>See details on pages 13–15.</td>
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<tr>
<td>1. One-Year S&amp;P 500® Point-to-Point With Cap.</td>
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<tr>
<td>2. One-Year Gold Strategy With Cap.</td>
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<tr>
<td>3. One-Year Dow Jones Real Estate Monthly Averaging With Participation Rate.</td>
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<tr>
<td>5. Two-Year S&amp;P 500® Point-to-Point With Participation Rate.</td>
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<tr>
<td>7. Three-Year Blended Monthly Averaging With Participation Rate.</td>
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<tr>
<td>8. Declared Interest Account.</td>
</tr>
</tbody>
</table>
Penalty-Free Withdrawals
See details on pages 16–18.

- Up to 10% penalty-free withdrawals annually after the first year, or RMDs.
- Waiver for nursing home or hospital confinement and for annuitization after five years.

Guaranteed Minimum Value
See details on Page 16.

- Currently 1% on 100% of premium, less surrender charges.

Liberty Optimizer Fee
See details on Page 18.

- 1% on LibertyMark 7.
- 1.25% on LibertyMark 10, 10 Plus, 10 LT, and 10 LT Plus.

Bonus

LibertyMark 10 Plus includes two bonuses (5% upfront and 10% persistency, payable at the end of Year 10). The persistency bonus is 8% in 10 LT Plus states (refer to State Approval Matrix). The premium bonus equals the premium multiplied by the premium bonus percentage. The persistency bonus equals the accumulation value at the end of the 10th contract year multiplied by the persistency bonus percentage. The premium bonus amount is part of the contract’s interest earnings and is credited to the accumulation value on the contract date.

Interest Crediting Strategies

With your guidance, clients can choose the strategy or combination of strategies that best helps them achieve their financial goals. An Owner can select more than one strategy; however, the amount going into any particular strategy must be at least $50.

Declared Interest Account
The interest rate for this option is declared and guaranteed for each 12-month period. The declared interest rate can change at any time for subsequent renewals or transfers but will never be less than 1%. The interest rate is declared for term periods of one year for premium allocated to this account. Money will be moved to this account on the 7th, 14th, 21st, and 28th of the month.

Indexed Interest Strategies
Seven indexed interest strategies are offered, using one or more of the following indices:

- S&P 500® Index (without dividends)—The S&P 500® is a leading stock market index and a primary economic indicator. The index measures price changes of 500 widely held U.S. common stocks. Dividends paid on the stocks underlying the index are not reflected in the index itself.

- London Gold Fixing PM Price Index (www.goldfixing.com)—The gold fixing index provides a recognized rate for the price of gold and is used as a benchmark for pricing the majority of gold products and derivatives throughout the world’s markets.

- Dow Jones U.S. Real Estate Index (DJUSRE)—A subset of the Dow Jones U.S. Index, which covers 95% of U.S. securities, the Dow Jones U.S. Real Estate Index represents Real Estate Investment Trusts and other companies that invest directly or indirectly in real estate through development, management, or ownership, including property agencies.
• **S&P 500® Average Daily Risk Control 10% Index (SPXAV10P)**—The S&P 500® Average Daily Risk Control 10% Price Return Index seeks to limit the volatility of the S&P 500® to a target level of 10% by allocating to cash.

The indexed interest strategies (also referred to as participation accounts) offer clients the opportunity to receive index credits based on a formula that tracks percentage changes in an index during a term period. Clients benefit from tax-deferred earnings and index-linked gains without eroding their principal. Interest credited is locked in annually and will never be less than 0%. Index interest credited can be impacted by market volatility.

If an owner dies prior to the next index crediting date, the indexed interest credit will be as of the date proof of death requirements are received. For crediting examples, see the LibertyMark strategy inserts.

<table>
<thead>
<tr>
<th>Available Indexed Options*</th>
<th>Methodology</th>
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<tr>
<td><strong>Strategy</strong></td>
<td><strong>Methodology</strong></td>
</tr>
<tr>
<td>One-Year S&amp;P 500® Point-to-Point With Cap</td>
<td>Interest credited is determined by taking the value of the index on the last day of the term period, comparing it with the value on the index date, and applying a cap to the increase.</td>
</tr>
<tr>
<td>One-Year Gold Strategy With Cap</td>
<td>Interest credited is determined by taking the value of the index on the last day of the term period and comparing it with the value on the index date. If the index decreases from the initial starting value, interest is credited subject to a cap. If the index increases over the term period, no interest is credited for that term period.</td>
</tr>
<tr>
<td>One-Year S&amp;P 500® Point-to-Point Inversion Strategy With Cap</td>
<td>Interest credited is determined by taking the value of the index on the last day of the term period and comparing it with the value on the index date. If the index decreases from the index value at the beginning of the period, and any increase is multiplied by a participation rate.</td>
</tr>
<tr>
<td>One-Year Dow Jones Real Estate Monthly Averaging With Participation Rate</td>
<td>The value of the Dow Jones U.S. Real Estate Index is measured each month during the term period. The index values are added together and divided by 12 to get an average value. The average is then compared with the index value at the beginning of the period, and any increase is multiplied by a participation rate.</td>
</tr>
<tr>
<td>Two-Year S&amp;P 500® Point-to-Point With Participation Rate</td>
<td>Interest credited is determined by taking the value of the index on the last day of the term period, comparing it with the value on the index date, and multiplying any increase by a participation rate.</td>
</tr>
<tr>
<td>Two-Year S&amp;P 500® Risk Control With Participation Rate</td>
<td>Interest credited is determined by taking the value of the index on the last day of the term period, comparing it with the value on the index date, and applying a cap to the increase.</td>
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</tbody>
</table>
| Three-Year Blended Monthly Averaging With Participation Rate | S&P 500®, Dow Jones U.S. Real Estate, and London Gold Fixings PM Price indices are combined to create a blended crediting rate. At the end of each term, the average three-year return of each index is weighted as follows:  
  • Best performing index = 50% weight.  
  • Second best performing index = 30% weight.  
  • Lowest performing index = 20% weight.  
  After the blended rate is calculated, a participation rate is applied. The average growth for each index can be positive, zero, or negative, but the final blended interest rate will never be less than zero. |

* May not be available in all states. Check State Approval Matrix for details.
Indexed Interest Strategy Terminology

**Participation Rate**—Applies to the Two-Year S&P 500® Point-to-Point With Participation Rate, Two-Year S&P 500® Risk Control With Participation Rate, One-Year Dow Jones Real Estate Monthly Averaging With Participation Rate, and Three-Year Blended Monthly Averaging With Participation Rate. The participation rate is declared by the Company for each term period. It is expressed as a percent of any index growth, is used to calculate any interest to be credited, and is guaranteed to be at least 5% (10% in New Jersey) for all indexed strategies.

**Cap**—Applies to the One-Year S&P 500® Point-to-Point With Cap, One-Year Gold Strategy With Cap, and One-Year S&P 500® Point-to-Point Inversion Strategy With Cap. The cap determines the maximum interest rate credited by the Company during the term period. The minimum cap is 1%. Current caps are subject to change at the discretion of Americo.

**Index Dates**
Index dates are the 7th, 14th, 21st, and 28th of the month. The index date for indexed interest strategies is the first of these dates that occurs immediately following the later of: (1) receipt of premium, (2) end of the index period for the strategy from which the funds will be transferred, or (3) the contract date. On premium allocated to an indexed interest strategy, a fixed interest rate will be paid from the date Americo receives the premium to the index date. If an index date falls on a date on which the index market is not open, the index value will be determined as of the last preceding date that the market was open for trading.

**Renews and Anniversaries**
An owner who wants to change interest crediting strategies must notify Americo no less than 15 days before the end of the term period. Clients will be notified 45 days prior to the index anniversary that they have until 15 days prior to their index anniversary to request any transfers. If no new interest crediting strategy is selected, funds will renew on the index date into the same interest crediting strategy. If a strategy is no longer available, funds will be allocated proportionately across the remaining interest crediting strategies in which accumulation value is allocated.

**Transfers Among Interest Crediting Options**
Initially, your clients may allocate premium among any of the available interest crediting strategies. Values may then be transferred among the interest crediting strategies only at the end of the term period. Transfers from the fixed account to an indexed strategy may occur only on the index date. The minimum transfer amount is $50, and any funds remaining in the fixed account or in an indexed interest strategy after a transfer must be at least $50.

**Contract Value Definitions**

**Accumulation Value**—The sum of all declared interest accounts plus all indexed interest strategies (also referred to as participation accounts) plus all premiums not yet allocated, including interest thereon.

**Cash Surrender Value**—Equal to the accumulation value less the surrender charge and less any applicable premium tax, or the Guaranteed Minimum Value, if greater.
Guaranteed Minimum Value—100% of premium less any partial surrenders (including any surrenders charges deducted thereon), less any premium tax, if applicable, with interest compounded daily at the guaranteed minimum value interest rate (a rate between 1% and 3%, set at the time the contract is issued), less surrender charges.

Access to Accumulation Value

Annuitization
LibertyMark surrender values may be converted to regular monthly annuity payments at any time, subject to the following provisions. The owner or beneficiary may elect one of the following settlement options to begin to receive payments of contract proceeds over a fixed period, in a fixed amount, or over the lifetime(s) of the designated person(s).

- Life Income Only.
- Life Income With Fixed Period Certain.
- Fixed Period Certain Only.
- Joint and Survivor.

For options with a guaranteed period, the minimum payout period is the shorter of 60 months or the life expectancy of the annuitant (the certain period cannot exceed the annuitant’s life expectancy). (See “Waiver of Surrender Charges” on Page 17 for additional details.) For all settlement options, the annuitant is the measuring life. If the annuitant should die before payments commence, then the owner will become the annuitant, unless otherwise requested by the owner.

Maturity Date
This is the date payments are required to begin under a settlement option. The maturity date differs by product version:

<table>
<thead>
<tr>
<th>LibertyMark 7</th>
<th>LibertyMark 10 and 10 LT</th>
<th>LibertyMark 10 Plus and 10 LT Plus</th>
</tr>
</thead>
<tbody>
<tr>
<td>Later of age 95 or 15 years after issue. Maturity date may be changed at the option of the owner to any date after the first contract anniversary.</td>
<td>Later of age 95 or 16 years.</td>
<td>Later of age 95 or 17 years.</td>
</tr>
</tbody>
</table>

Penalty-Free Withdrawals
Contractually, one penalty-free withdrawal is allowed per year after the first year, equal to 10% of the accumulation value as of the most recent contract anniversary. By current company practice, multiple penalty-free withdrawals are allowed annually provided the total does not exceed 10%. Subsequent withdrawals after the first are based on the accumulation value at the time of the withdrawal. The minimum withdrawal amount is $500, with a minimum remaining surrender value of $2,000. Withdrawals will be taken from the declared interest account on a last-in first-out (LIFO) basis first, and then any additional amounts needed will be taken from the indexed strategies on a LIFO basis.
**Monthly Interest Income**—By current company practice, interest-only withdrawals may be taken from the declared interest account in Year 1 after 30 days, subject to the annual 10% penalty-free withdrawal provision.

**Required Minimum Distribution**
Beginning in the first year, the required minimum distribution (RMD) amount associated with the contract may be withdrawn without surrender charges, even if it is greater than the 10% penalty-free withdrawal amount, as provided by company practice.

**Policy Loans**
Policy loans are available for TSA plans only while the contract is in force. The minimum loan amount is $250, with minimum remaining net surrender value of $1,000. The following provisions apply:

- The loan balance is credited with interest according to index increases.
- The loan amounts are charged interest at a current fixed rate of 8% (each loan’s interest rate is set at the time the loan is taken and fixed for the life of the loan).
- There is no fee for the first loan taken. For additional loans, a loan processing charge of $25 is deducted from the accumulation value.

Refer to loan endorsement for details.

**Waiver of Surrender Charges**
Surrender charges are waived if:

- After contract issue the owner is confined to a qualified nursing home or hospital for at least 90 days. The Waiver of Surrender Charge Upon Nursing Home or Hospital Confinement (Rider Series 4139) may not be available in all states. Please check the State Approval Matrix for states where this waiver is unavailable and for state variations.
- A settlement option is elected of at least five years and the contract has been in force for at least five years. All of the payment options, except income for a fixed period, provide a guaranteed income your client cannot outlive.

**Surrender Charges**
Surrender charges apply to full or partial withdrawals made in excess of the penalty-free amount during the first seven or 10 years, depending on the product selected, as shown in the following surrender charge schedules. The surrender charges equal the surrender charge percentage for the applicable year, multiplied by the amount of accumulation value withdrawn that exceeds the surrender charge-free withdrawal allowance, and are as follows (surrender charges may vary by state and product version).
Surrender Charge Schedules

<table>
<thead>
<tr>
<th>Contract Year</th>
<th>LibertyMark 7</th>
<th>LibertyMark 10</th>
<th>LibertyMark 10 LT</th>
<th>LibertyMark 10 Plus</th>
<th>LibertyMark 10 LT Plus (FL 65+)</th>
<th>LibertyMark 10 LT (CT)</th>
<th>LibertyMark 10 LT Plus (CT)</th>
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<tr>
<td>1</td>
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<td>12.00%</td>
<td>9.20%</td>
<td>13.00%</td>
<td>12.40%</td>
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</table>

Liberty Optimizer Fee

In exchange for access to higher accumulation potential offered by a range of strategies unavailable elsewhere, the Liberty Optimizer Fee is applied to the accumulation value at the beginning of each contract year, including the first. The Liberty Optimizer Fee is a deduction of 1% on LibertyMark 7 and 1.25% on LibertyMark 10, 10 Plus, 10 LT, and 10 LT Plus and is set for the life of the contract.

Death Benefit

The greater of the accumulation value or guaranteed minimum value is payable to the beneficiary upon the death of any owner unless:

- The designated beneficiary is the surviving spouse and elects to continue the contract.
- The owner is not an individual, in which case the death benefit is payable on the death of the primary annuitant.

Partial year index credits will be given. The index value on the date proof of death requirements are received will be used to determine final index credits to the accumulation value.

Commissions

Complete details on LibertyMark commissions are provided in Legacy’s Compensation Schedule. In general, single premium commissions are based on the issue age of the oldest owner. There will be a chargeback on death, surrender, lapse, cancellation, and withdrawal: 100% in the first six months and 50% in months 7 through 12. The chargeback is 100% if premium is withdrawn in the first year due to nursing home rider.
Doing Business With Americo

Legacy’s new carrier relationship with Americo Financial Life and Annuity Insurance Company offers strong opportunities to build your success. But before you can start selling LibertyMark, our first joint proprietary FIA series with Americo, take time to review important differences in doing business with Americo.

Contracting and Appointment With Americo

In addition to your active contract with Legacy, you will need to be contracted and appointed with Americo. To download Americo contracting paperwork, visit the LegacyNet® Forms Store (access via www.legacynet.com).

- Please review Americo Contracting Guidelines to determine eligibility.
- For instructions on completing your paperwork, refer to Legacy’s “Americo Contracting and Appointment” checklist (located on The Forms Store).
- Return your completed paperwork to AmericoContracting@legacynet.com.
- Include proof of completion of your LIMRA Anti-Money Laundering training and proof of E&O coverage (for details, see the “Helpful Information” page of LegacyNet).
- Allow seven business days for processing of your request.
- Your Americo Writing Number will be a 10-digit code. The leading zeroes are part of your Writing Number and must be included on all applications.

Questions? Call Legacy’s Sales Team at 800-395-1053, Ext. 4002.

Before Writing Business

As with all Legacy exclusive annuity products, before soliciting a sale, you must complete product training. For all training links, see the “Annuity Training and Acknowledgement” page of LegacyNet.

Submitting New Business

The LibertyMark new business processing form, application, and all required forms and disclosures are available on The Forms Store, along with marketing materials. You must include your full Americo Writing Number—including all leading zeroes—on the application. For assistance completing the LibertyMark application, call Legacy’s Suitability Help Desk at 800-395-1053, Ext. 5819.

Fax, e-mail, or mail completed new business applications to Americo at:

- Fax: 800-395-9261.
- E-mail: submit@americo.com
- Regular mail: Americo, P.O. Box 410288, Kansas City, MO 64141-0288.
- Overnight delivery: Americo, 300 W. 11th Street, Kansas City, MO 64105-1618.

Who To Contact for Assistance

- For marketing and sales support, product information, and assistance with licensing and contracting, call Legacy’s Sales Team at 800-395-1053, Ext. 4002.
- For suitability questions and assistance completing the LibertyMark application, call Legacy’s Suitability Help Desk at 800-395-1053, Ext. 5819.
• For questions on status of new business requirements and policyholder service requests, call Americo Customer Service at 800-786-4558.

Commissions
Your commissions will continue to be paid by Legacy—you’ll still receive only one 1099, and your production will count toward qualification for our incentive trips and promotions! With Americo, your commissions are paid the next Tuesday or Friday following the issue date. For specifics on LibertyMark commissions, see Page 18 and refer to the Compensation Schedule on LegacyNet.

Carrier Rating and Administrative Questions
What is Americo’s A.M. Best rating?
The A.M. Best financial strength rating for Americo Financial Life and Annuity Insurance Company as of March 2014 is A- (Excellent), 4th out of 15 ratings ranging from “A++” to “F.”

Will Americo accept wire transfers of premiums?
Yes. Wire transfer instructions and forms are available on LegacyNet®.

Are exchanges/transfers permitted from an existing Americo deferred annuity to a LibertyMark annuity?
Yes, but surrender charges will NOT be waived on existing annuities. Please refer to Legacy’s Compensation Schedule for information on commissions.

Is there a rate lock on 1035 Exchanges?
Yes. For premiums from 1035 Exchanges and transfers facilitated by America’s Administrative Office, interest rates, caps, and participation rates will be locked in for 45 days from the date the application is received in the Administrative Office. Please note that the premium receives the greater of the rate in effect on the date the application is received or the index date. If cash is received with the application (rate lock start date) and transfer premium is received at a later date, all the premium will receive the same higher rate as long as the transfer premium was received within the rate lock duration of 45 days.

Are annual consumer statements provided?
Yes. Americo provides statements on an annual basis.

Where can I obtain forms or download brochures?
You can locate and print all forms for point of sale, including applications and required forms and disclosures from The Forms Store on LegacyNet (access via www.legacynet.com). In addition, you’ll find licensing and contracting, policyholder services, marketing materials, and other Legacy forms on The Forms Store. You can also order product kits from The Forms Store to help you sell. Kits include client brochures, product-specific inserts, and interest crediting strategy overviews (see the Producer Resources section for marketing material form numbers for LibertyMark).

* Rating for Americo Financial Life and Annuity Insurance Company (Americo), 2014. Americo Financial Life and Annuity Insurance Company has a financial strength rating of A- (Excellent, 4th out of 15 rating categories). A.M. Best’s rating is assigned after a comprehensive quantitative and qualitative evaluation of a company’s balance sheet strength, operating performance, and business profile. A.M. Best uses a scale of 15 ratings, ranging from “A++” to “F.”

FOR BROKER USE ONLY. NOT FOR USE WITH CONSUMERS.
If I have questions on suitability guidelines, who can I contact?
Call Legacy’s Sales Team at 800-395-1053, Ext. 4002, or the Suitability Help Desk at 800-395-1053, Ext. 5819, before solicitation for answers to your suitability questions. The Suitability Help Desk can also be reached at SuitabilityHelpDesk@LegacyNet.com and can review your first application prior to sending it in.

I need help filling out forms. Who can I call?
Call Legacy’s Sales Team at 800-395-1053, Ext. 4002, or the Suitability Help Desk at 800-395-1053, Ext. 5819.

**Producer Resources**

**Marketing and Distribution**
Legacy Marketing Group

**Mailing Address**
2090 Marina Ave., Petaluma, CA 94954-6714

**Sales Support**
Phone: 800-395-1053, Ext. 4002
Fax: 800-211-5641

**Customer Service and Suitability Help Desk**
Phone: 800-395-1053, Ext. 5819
E-mail: SuitabilityHelpDesk@legacynet.com

**Administrative Services**
Americo Financial Life and Annuity Insurance Company

**Mailing Address**
P.O. Box 410288
Kansas City, MO 64141-0288

**Overnight Delivery**
300 W. 11th St.
Kansas City, MO 64105-1618

**New Business**
Phone: 800-786-4558
E-mail: submit@americo.com
Fax: 800-395-9261, 800-395-9238, or 877-388-3448

**Licensing & Contracting (Contact Legacy):**
Phone: 800-395-1053, Ext. 4002
E-mail: AmericoContracting@legacynet.com

**Client brochures:**
- LibertyMark brochure (AF1001).
- Product inserts (AF1009–AF1016).
- Interest crediting strategy inserts (AF1002–AF1008).

**Producer Tools:**
Browse LegacyNet® (access via www.legacynet.com) for:
- State Approval Matrix.
- *Quick Reference.*
- The Forms Store—for application, state-specific forms, and New Business forms.
- Current interest rates and charges.
Products issued by

AMERICO

Products distributed by

LEdACY

Legacy Marketing Group®
dba: Legacy Marketing Insurance Services (CA Only)
2090 Marina Avenue, Petaluma, CA 94954-6714
Telephone: 800-395-1053 • Fax: 800-211-5641
www.legacynet.com

LibertyMark 7, LibertyMark 10, 10 LT (Policy Series 411/4182), and LibertyMark 10 Plus, 10 Plus LT (Policy Series 411/4179/4182/4184) are single premium deferred fixed indexed annuities underwritten by Americo Financial Life and Annuity Insurance Company (Americo), Kansas City, MO, and may vary in accordance with state laws. Some products and benefits may not be available in all states. Certain restrictions and variations apply. Consult policy and riders for all limitations and exclusions. Legacy Marketing Group is an independent, authorized agency of Americo.

Important Information
Americo Financial Life and Annuity Insurance Company is authorized to conduct business in the District of Columbia and all states except NY and VT.

Neither Americo Financial Life and Annuity Insurance Company nor any agent representing Americo Financial Life and Annuity Insurance Company is authorized to give legal or tax advice. Clients should consult a qualified professional regarding the information and concepts contained in this material.

Withdrawals may be subject to ordinary income tax, and a 10% IRS penalty may apply to withdrawals taken before age 59½.

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No bank guarantee. • Not FDIC/NCUA/NCUSIF insured. • May lose value if surrendered early.
Product Training Verification

Please close this document and return to Step 2 of “Steps To Complete Your Annuity Training” on LegacyNet®.

After clicking the link in Step 2, you will be taken to the Annuity Training Acknowledgement page. There you will be asked to provide your name, Producer number, and e-mail address and to verify that you have viewed this presentation by clicking “I Agree.”

After clicking “I Agree,” your completed acknowledgement will be submitted to our Administrative Office, and you will receive an e-mail confirming receipt. Please retain that confirmation for your records. If you have questions or need assistance, please call 800-395-1053, Ext. 4002.