

GRIB Commutable Annuitization Option Form

*Note: If you select a commutation option in connection with your **GRIB** rider, you may be subject to additional tax risks. You should consult a tax adviser before selecting any commutation options in connection with your **GRIB** rider.*

Overnight deliveries can be sent to:
7805 Hudson Rd, Ste 180
Woodbury MN 55125
USA

Please Print All Information Below

Section 1. Annuitant Information

First Name M Last Contract Number

Residence, Street Address City State Zip

Is this a change of address? Yes No Home Phone Number - -

Social Security Number Date of birth - -

Email Address

Work Phone Number Cell Phone Number

Are you a U.S. Citizen? Yes No Country of residence:

(If the answer is "NO" you will need to fill out a W8-BEN form and send the form to Zurich, Administrative Offices, PO BOX 64361, St. Paul, MN 55164-0361)

Note: If you live outside of the United States of America, you must complete Section 8 of this form.

Section 2. Joint Annuitant (if applicable)

First Name M Last

Residence, Street Address City State Zip

Is this a change of address? Yes No Home Phone Number - -

Social Security Number Date of birth - -

Email Address

Work Phone Number Cell Phone Number

Are you a U.S. Citizen? Yes No

Country of residence:

(If the answer is "NO" you will need to fill out a W8-BEN form and send the form to Zurich, Administrative Offices PO BOX 64361, St. Paul MN 55164-0361)

Section 3. Commutable Annuitization Payment - (Commutation Payment)

If your original contract was issued on or after August 24, 1999 and you elected the GRIB Commutable Option on the GRIB Annuity Income Option Form, you as the Annuitant, may take a full lump sum commutation distribution based on the present value of your remaining guaranteed annuity installment payments pursuant to your GRIB Annuitization election, as described in the Prospectus. For qualified plans, you may elect up to a 100% commutation, for non-qualified plans you may elect up to a 75% commutation.

You may also elect a partial lump sum distribution; however, that election is limited to no more than once per calendar year. When you elect a partial lump sum distribution, the remaining guaranteed annuity installments will be reduced. Your partial lump sum distributions, in total, cannot reduce the original GRIB annuitization payment by more than 75% for non-qualified plans. A 100% commutation for qualified plans will result in your guaranteed annuity installments being reduced to \$0.

Once the guaranteed installment period is over, if alive, your original annuity payments will resume according to your original GRIB election.

If your ZALICO annuity contract is for federal income tax purposes, any type of a tax qualified contract (403(b)/TSA, 401(k), or IRA) and you are 72 years of age or older, part of your lump sum commutation distribution from the contract maybe a Required Minimum Distribution ("RMD") for tax purposes. RMD amounts may not be rolled over to another plan or carrier and are subject to Federal and State income tax withholding.

You have not satisfied your RMD requirement for the year if you have not received all of your annuity payments for the year. If you are electing a trustee to trustee transfer or a tax free rollover and you have not previously taken the full amount of your RMD for the year, the remaining amount needed to satisfy your RMD must be taken from the commutation rollover proceeds and sent to you in a separate check.

Commutation Payment requested: (Please complete the box below)

%

Section 4. Tax free Trustee to Trustee or a Tax-Free Rollover of your Lump Sum Commutation Distribution Payment to a Financial Institution or a New Carrier – (For IRA, 403(b) / TSA, 401 (k), and all other qualified plans)

I elect to directly transfer my commutation amount (reduced by any RMD required under the Internal Revenue Code with respect to my annuity contract for the current year) to a IRA or other tax qualified account(s) that I currently own, to either a financial institution or a new carrier.

If you checked the above box please provide a letter for acceptance from the financial institution/new carrier listed below, confirming the tax qualified type of your account. A Signature Guarantee form or Corporate Resolution form from the financial institution/new carrier must accompany this paperwork sent to ZALICO. Please complete the information below concerning the transfer or rollover to the financial institution/new carrier that will receive your commutation amount.

Payee Account Number if any

Street Address/FBO

Phone Number (New Carrier)

Street Address

City, State, Zip Code

Section 5. Federal and State Income Tax Withholding

Federal Income Tax Withholding Rules

Lump Sum Payments:

- *Eligible rollover distribution from certain tax qualified contracts.* If the **ZALICO** contract is for federal income tax purposes a tax qualified 403(b) (**TSA**) or 401(k) contract, **ZALICO** generally is required to withhold 20% of the taxable amount of your lump sum payment paid to you to the extent that it is an eligible rollover distribution. You cannot elect out of this federal income tax withholding.
- *Lump sum payment from an **IRA** or a non-qualified contract.* If the **ZALICO** contract is for federal income tax purposes a tax qualified **IRA** contract or a non-qualified contract, **ZALICO** is required to withhold 10% of the taxable amount of your lump sum payment. However, you can elect out of this federal income tax withholding.
- *Required minimum distribution from a tax qualified contract.* If the **ZALICO** contract is for federal income tax purposes any type of tax qualified contract, part or all of a lump sum distribution from the contract may be a required minimum distribution (**RMD**) for tax purposes. **ZALICO** generally is required to withhold 10% of the taxable amount of your **RMD** payment. However, you generally can elect out of this federal income tax withholding.
- *Direct rollover or transfer of a tax qualified contract.* If the **ZALICO** contract is for federal income tax purposes any type of tax qualified contract (i.e. 403(b) (**TSA**), 401(k), **IRA**), and you elect a tax-free trustee-to-trustee transfer or a tax-free direct rollover with respect to part or all of a lump sum distribution to another tax qualified arrangement by completing the appropriate paperwork with **ZALICO**, **ZALICO** will not withhold from the transfer or direct rollover proceeds any amounts for federal income taxes.
- **ROTH IRAs.** In general, no federal income tax withholding is required on distributions from **Roth IRAs**.

Annuity Payments

- **Periodic Payments.** You are currently receiving periodic annuity payments under a supplemental agreement which is subject to federal income tax withholding on the taxable portion of the annuity payment. If you elect a partial commutation, you will receive reduced periodic annuity payments and **ZALICO** will withhold federal income taxes from the taxable portion of the reduced annuity payments. However, you can elect out of this federal income tax withholding.

Insufficient Withholding: Please note that if you elect not to have withholding apply, or if you do not have enough federal income tax withheld from your lump sum or periodic payments, you are liable for payment of federal income tax on the taxable portion of the payment, and you may be responsible for payment of estimated tax. You may incur penalties under the estimated tax rules if your withholding and estimated tax payments are not sufficient.

Federal Income Tax Elections – please check one or more boxes depending on your circumstances.

Lump Sum Payments

- *Eligible rollover distribution from certain tax qualified contracts*
 - Since the ZALICO contract is a tax qualified 403(b) (TSA) or 401(k) contract, I understand that ZALICO must withhold 20% of the taxable amount of my lump sum commutation payment paid to me to the extent that it is an eligible rollover distribution, and I understand that I could have elected a direct rollover or transfer to avoid this mandatory withholding.

- *Lump sum payment from an IRA or a non-qualified contract.* Since the ZALICO contract is a tax qualified IRA contract or a non-qualified contract, I understand that ZALICO will withhold 10% of the taxable amount of my lump sum commutation payment unless I instruct ZALICO otherwise by checking one of the following boxes:
 - Not to have any amounts withheld from my lump sum commutation payment, or
 - To have an amount withheld equal to _____% of the taxable amount of my lump sum commutation payment.

- *Required minimum distribution from a tax qualified contract.* Since the ZALICO contract is a tax qualified contract, I understand that ZALICO will withhold 10% of the taxable amount of any portion of my lump sum commutation payment that is an RMD, unless I instruct ZALICO otherwise by checking one of the following boxes:
 - Not to have any amounts withheld from my RMD payment, or
 - To have an amount withheld equal to _____% of the taxable amount of the RMD payment.

- *Direct rollover or transfer of a tax qualified contract.*
 - The ZALICO contract is a tax qualified contract, and I have elected a tax-free trustee-to-trustee transfer or a tax-free direct rollover of part or all of my lump sum commutation payment by completing the appropriate paperwork with ZALICO. Therefore, no amounts will be withheld from the transfer or direct rollover proceeds for federal income taxes.

Annuity Payments

- *Periodic Payments.* Since I will receive reduced periodic annuity payments under a supplementary agreement with respect to the ZALICO contract after electing a partial commutation, I understand that ZALICO is required to withhold federal income taxes from the taxable portion of those payments, generally as if I am a married individual claiming three withholding allowances (ZALICO will use a 20% Federal income tax withholding rate as a proxy) unless I instruct ZALICO otherwise by checking one of the following boxes:
 - Not to have any amounts withheld from my reduced annuity payments, or
 - To have an amount withheld equal to _____% of the taxable amount of my reduced annuity payments.

Note: Your withholding elections for annuity payments will remain in effect until you revoke it. You may make and revoke the withholding election any time by writing a letter of instruction to revoke and send the letter to Zurich Administrative Office: PO BOX 64361, St. Paul MN 55164-0361.

State Income Tax Withholding Rules

State Income Tax Withholding is based on your legal state of residence as shown in our records.

The amount of state income tax withheld (if any) based on whether your payment is a periodic or a non-periodic payment and then depending on the classification of the tax status of your contract, e.g. IRA, 403(b)/TSA and Non-Qualified.

Please refer to the attached document – State Income Tax Withholding Information Document for guidance in checking the box or boxes that applies to you.

State Income Tax Elections

A. No State Income Tax Withholding

My legal state of residence is one of the states classified in the attached document as – No State Income Tax Withholding. I confirm

There will be no amounts withheld for state income taxes.

B. Voluntary State Income Tax Withholding

My legal state of residence is one of the states classified in the attached document as a – Voluntary State Income Tax Withholding. I elect

Not to have any amounts withheld.

To have an amount withheld of _____% of the taxable amount of my lump sum commutation payment paid.

To have an amount withheld of _____% of the taxable amount of my new reduced annuity payments paid. (Applicable if electing a partial commutation)

To have an amount withheld of _____% of the taxable amount of the RMD payment paid.

C. Required State Income Tax Withholding – Elections Permitted in Certain Circumstances

My legal state of residence is one of the states classified in the attached document as a – Required State Income Tax Withholding – Elections Permitted in Certain Circumstances. I elect

Please note this section is not for residents of California and Vermont

- Not to have any amounts withheld – (my transaction allows me to elect out of withholding)
- To have an amount withheld of _____% of the taxable amount of my lump sum commutation payment paid.
- To have an amount withheld of _____% of the taxable amount of my new reduced annuity payments paid. (Applicable if electing a partial commutation)
- To have an amount withheld of _____% of the taxable amount of the RMD payment paid.

Please note that if you do not make any elections above, ZALICO will use as a default the State Income Tax Withholding percentage as outlined in the attachment – State Income Tax Withholding Information Document – pursuant to your legal State of residence, multiplied by the taxable amount of each of your payments paid.

Please note this section is for residents of California and Vermont only

- Not to have any amounts withheld – (my transaction allows me to elect out of withholding)
- To have an amount withheld of _____% of the taxable amount of my lump sum commutation payment paid.
- To have an amount withheld of _____% of the taxable amount of my new reduced annuity payments paid. (Applicable if electing a partial commutation).
- To have an amount withheld of _____% of the taxable amount of the RMD payment paid.

Please note that if you do not make any elections above, ZALICO will use as a default the State Income Tax Withholding percentage (10% CA; 27% VT) as outlined in the attachment – State Income Tax Withholding Information Document – pursuant to your legal State of residence, multiplied by the Federal income tax amount withheld for each of your payments paid.

D. Mandatory State Income Tax Withholding When Federal Income Tax is Withheld

My legal state of residence is one of the states classified in the attached document as a – Mandatory State Income Tax Withholding When Federal Income Tax is Withheld. I elect

- Not to have any amounts withheld - (applicable if federal income taxes have not been withheld except for Michigan)
- To have an amount withheld of _____% of the taxable amount of my lump sum commutation payment paid.
- To have an amount withheld of _____% of the taxable amount of my new reduced annuity payments paid. (Applicable if electing a partial commutation).
- To have an amount withheld of _____% of the taxable amount of the RMD payment paid.

Please note that if you do not make any elections above, ZALICO will use as a default the State Income Tax Withholding percentages as outlined in the attachment – State Income Tax Withholding Information Document - pursuant to your legal state residence, multiplied by the taxable amount of each of your payments paid.

E. Mandatory State Income Tax Withholding on all taxable distribution

My legal state of residence is one of the states classified in the attached document as a – Mandatory State Income Tax Withholding on all taxable distribution. I elect

- To have an amount withheld equal to the default state income tax withholding percentage of my legal state of residence, multiplied by the taxable amount of each of my payments paid.

Section 6. Direct Deposit Authorization (Must Include a Blank Voided Check) (For payee(s) who live in USA)

- By checking this box your annuity check and any other payments that are to be paid to you will be deposited automatically into your checking bank account of your choice, provided your bank is a member of the Automated Clearing House. Please include a blank voided check otherwise we will not be able to process your request. Thank you

Section 7. Foreign Wire Instruction (required for payees who live outside of the USA)

- I live outside of the United States of America. I will complete the form **ZA-2001 International Wire Transfer Authorization** and attach it as well.

Note: Please go to the website <https://www.zurichamericanlifeinsurance.com/> and click on the menu link of Customer Service/ Download Forms to download ZA-2001 form. You can also use Customer Service Phone number 1-800-499-0523 or Fax number 1-866-605-3962 to request the form.

Section 8. Signature of Annuitant and Joint Annuitant (if Applicable)

By signing below:

- I choose to commute proceeds from the Zurich American Life Insurance Company contract.
- I understand that the future payments will be reduced during the guaranteed installment period.
- I understand that the commutation requested may not be changed after the commutation payment is issued.
- I understand that by completing Section 6 of this form, Direct Deposit Authorization, or Section 7 of Foreign Wire Instruction, I authorize the Company to deposit my annuity payments and other payments that are to be paid to me, direct into my bank account pursuant to the information contained in the blank voided check or the form **ZA-2001** I submitted.
- I acknowledge that exercising the GRIB commutable benefit may be a taxable event.
- I understand that I should consult with a tax advisor before making such a financial decision.
- I understand that laws in my state may make it a crime to complete a claim form with information I know to be false, or to leave out material facts.
- I understand that this form will be valid for 30 days from the date I sign this form.

Zurich American Life Insurance Company cannot be responsible for any expenses incurred in connection with the completion of this GRIB Commutable Annuity Income Option Form

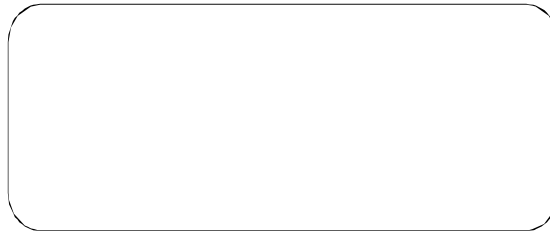
Annuitant's Signature Date

Joint Annuitant's Signature Date
(If applicable)

Note: All Signatures above are to be guaranteed.

Signature Guarantee with Medallion Stamp:

(Bank Officer Medallion or Broker Dealer Medallion)



Section 9. Spousal Consent Signature

Spousal Consent for Community Property States: If the plan participant is a resident of AZ, CA, ID, LA, NV, NM, TX, WA or WI, spousal consent is required unless the participant has no legal spouse.

Signature of Contract Owner's Spouse: _____ Date: _____

Check here if Contract Owner has no legal spouse

Contract Owner's Spousal Consent for ERISA plans: I hereby consent to the request as stated above. I understand that a spouse is guaranteed certain rights to assets in this retirement account by federal law and that these include the right to a pre-retirement survivor's annuity and a joint and survivor annuity and that these rights could be diminished by changes to the contract.

Signature of Contract Owner's Spouse: _____ Date: _____

Check here if Contract Owner has no legal spouse

Note: All Signatures above are to be guaranteed.

Signature Guarantee with Medallion Stamp:

(Bank Officer Medallion or Broker Dealer Medallion)



ELIGIBLE ROLLOVER DISTRIBUTION NOTICE

IN ACCORDANCE WITH THE IRS SAFE HARBOR EXPLANATION IN NOTICE 2009-68

(For qualified employer plans such as 403(b)/TSA and 401(k))

YOUR ROLLOVER OPTIONS

Zurich American Life Insurance Company is providing this notice to you because if all or a portion of a payment you are receiving is from an employer plan, such as a **403(b) plan or a 401(k) plan (the “Plan”)**, then these payments are eligible to be rolled over to an IRA or an employer plan. This notice is intended to help you decide whether to do such a rollover.

This notice contains information provided by the Internal Revenue Service (the “IRS”) in the safe harbor explanation in IRS Notice 2009-68, describing the rollover rules that apply to payments from the Plan that are not from a designated Roth account (a type of account with special tax rules in some employer plans). If you also receive a payment from a designated Roth account in the Plan, you will be provided a different notice for that payment, and the Plan administrator or the payor will tell you the amount that is being paid from each account.

Rules that apply to most payments from a plan are described in the “General Information About Rollovers” section. Special rules that only apply in certain circumstances are described in the “Special Rules and Options” section.

GENERAL INFORMATION ABOUT ROLLOVERS

How can a rollover affect my taxes?

You will be taxed on a payment from the Plan if you do not roll it over. If you are under age 59½ and do not do a rollover, you will also have to pay a 10% additional income tax on early distributions (unless an exception applies). However, if you do a rollover, you will not have to pay tax until you receive payments later and the 10% additional income tax will not apply if those payments are made after you are age 59½ (or if an exception applies).

Where may I roll over the payment?

You may roll over the payment to either an IRA (an individual retirement account or individual retirement annuity) or an employer plan (a tax-qualified plan, section 403(b) plan, or governmental section 457(b) plan) that will accept the rollover. The rules of the IRA or employer plan that holds the rollover will determine your investment options, fees, and rights to payment from the IRA or employer plan (for example, no spousal consent rules apply to IRAs and IRAs may not provide loans). Further, the amount rolled over will become subject to the tax rules that apply to the IRA or employer plan.

How do I do a rollover?

There are two ways to do a rollover. You can do either a direct rollover or a 60-day rollover.

If you do a direct rollover, the Plan will make the payment directly to your IRA or an employer plan. You should contact the IRA sponsor or the administrator of the employer plan for information on how to do a direct rollover.

If you do not do a direct rollover, you may still do a rollover by making a deposit into an IRA or eligible employer plan that will accept it. You will have 60 days after you receive the payment to make the deposit. If you do not do a direct rollover, the Plan is required to withhold 20% of the payment for federal income taxes (up to the amount of cash and property received other than employer stock). This means that, in order to roll over the entire payment in a 60-day rollover, you must use other funds to make up for the 20% withheld. If you do not roll over the entire amount of the payment, the portion not rolled over will be taxed and will be subject to the 10% additional income tax on early distributions if you are under age 59½ (unless an exception applies).

How much may I roll over?

If you wish to do a rollover, you may roll over all or part of the amount eligible for rollover. Any payment from the Plan is eligible for rollover, except:

- Certain payments spread over a period of at least 10 years or over your life or life expectancy (or the lives or joint life expectancy of you and your beneficiary)

- Required minimum distributions after age 72 (or after death) Hardship distributions

- ESOP dividends

- Corrective distributions of contributions that exceed tax law limitations

- Loans treated as deemed distributions (for example, loans in default due to missed payments before your employment ends)

- Cost of life insurance paid by the Plan

- Contributions made under special automatic enrollment rules that are withdrawn pursuant to your request within 90 days of enrollment

Amounts treated as distributed because of a prohibited allocation of S corporation stock under an ESOP (also, there will generally be adverse tax consequences if you roll over a distribution of S corporation stock to an IRA).

The Plan administrator or the payor can tell you what portion of a payment is eligible for rollover.

If I don't do a rollover, will I have to pay the 10% additional income tax on early distributions?

If you are under age 59½, you will have to pay the 10% additional income tax on early distributions for any payment from the Plan (including amounts withheld for income tax) that you do not roll over, unless one of the exceptions listed below applies. This tax is in addition to the regular income tax on the payment not rolled over.

The 10% additional income tax does not apply to the following payments from the Plan:

- Payments made after you separate from service if you will be at least age 55 in the year of the separation

- Payments that start after you separate from service if paid at least annually in equal or close to equal amounts over your life or life expectancy (or the lives or joint life expectancy of you and your beneficiary)

- Payments from a governmental defined benefit pension plan made after you separate from service if you are a public safety employee and you are at least age 50 in the year of the separation

- Payments made due to disability

- Payments after your death

- Payments of ESOP dividends

- Corrective distributions of contributions that exceed tax law limitations

- Cost of life insurance paid by the Plan

- Contributions made under special automatic enrollment rules that are withdrawn pursuant to your request within 90 days of enrollment

- Payments made directly to the government to satisfy a federal tax levy

- Payments made under a qualified domestic relations order (QDRO)

- Payments up to the amount of your deductible medical expenses

- Certain payments made while you are on active duty if you were a member of a reserve component called to duty after September 11, 2001 for more than 179 days

- Payments of certain automatic enrollment contributions requested to be withdrawn within 90 days of the first contribution.

If I do a rollover to an IRA, will the 10% additional income tax apply to early distributions from the IRA?

If you receive a payment from an IRA when you are under age 59½, you will have to pay the 10% additional income tax on early distributions from the IRA, unless an exception applies. In general, the exceptions to the 10% additional income tax for early distributions from an IRA are the same as the exceptions listed above for early distributions from a plan. However, there are a few differences for payments from an IRA, including:

There is no exception for payments after separation from service that are made after age 55.

The exception for qualified domestic relations orders (QDROs) does not apply (although a special rule applies under which, as part of a divorce or separation agreement, a tax-free transfer may be made directly to an IRA of a spouse or former spouse).

The exception for payments made at least annually in equal or close to equal amounts over a specified period applies without regard to whether you have had a separation from service.

There are additional exceptions for (1) payments for qualified higher education expenses, (2) payments up to \$10,000 used in a qualified first-time home purchase, and (3) payments after you have received unemployment compensation for 12 consecutive weeks (or would have been eligible to receive unemployment compensation but for self-employed status).

Will I owe State income taxes?

This notice does not describe any State or local income tax rules (including withholding rules).

Your right to Waive the 30-Day Notice Period. Generally, neither a direct rollover nor a payment can be made from the Plan until at least 30 days after the receipt of this notice. Thus, after receiving this notice, you have at least 30 days to consider whether or not to have your withdrawal directly rollover over. If you do not wish to wait until this 30-day notice period ends before your election is processed, you may waive the notice period by making an affirmative election indicating whether or not you wish to make a direct rollover. Your withdrawal will then be processed in accordance with your elections as soon as practical after it is received by the Plan administrator or Payor.

SPECIAL RULES AND OPTIONS

If your payment includes after-tax contributions

After-tax contributions included in a payment are not taxed. If a payment is only part of your benefit, an allocable portion of your after-tax contributions is generally included in the payment. If you have pre-1987 after-tax contributions maintained in a separate account, a special rule may apply to determine whether the after-tax contributions are included in a payment.

You may roll over to an IRA a payment that includes after-tax contributions through either a direct rollover or a 60-day rollover. You must keep track of the aggregate amount of the after-tax contributions in all of your IRAs (in order to determine your taxable income for later payments from the IRAs). If you do a direct rollover of only a portion of the amount paid from the Plan and a portion is paid to you, each of the payments will include an allocable portion of the after-tax contributions. If you do a 60-day rollover to an IRA of only a portion of the payment made to you, the after-tax contributions are treated as rolled over last. For example, assume you are receiving a complete distribution of your benefit which totals \$12,000, of which \$2,000 is after-tax contributions. In this case, if you roll over \$10,000 to an IRA in a 60-day rollover, no amount is taxable because the \$2,000 amount not rolled over is treated as being after-tax contributions.

You may roll over to an employer plan all of a payment that includes after-tax contributions, but only through a direct rollover (and only if the receiving plan separately accounts for after-tax contributions and is not a governmental section 457(b) plan). You can do a 60-day rollover to an employer plan of part of a payment that includes after-tax contributions, but only up to the amount of the payment that would be taxable if not rolled over.

If you miss the 60-day rollover deadline

Generally, the 60-day rollover deadline cannot be extended. However, the IRS has the limited authority to waive the deadline under certain extraordinary circumstances, such as when external events prevented you from completing the rollover by the 60-day rollover deadline. To apply for a waiver, you must file a private letter ruling request with the IRS. Private letter ruling requests require the payment of a nonrefundable user fee. For more information, see IRS Publication 590, Individual Retirement Arrangements (IRAs).

If your payment includes employer stock that you do not rollover

If you do not do a rollover, you can apply a special rule to payments of employer stock (or other employer securities) that are either attributable to after-tax contributions or paid in a lump sum after separation from service (or after age 59½, disability, or the participant's death). Under the special rule, the net unrealized appreciation on the stock will not be taxed when distributed from the Plan and will be taxed at capital gain rates when you sell the stock. Net unrealized appreciation is generally the increase in the value of employer stock after it was acquired by the Plan. If you do a rollover for a payment that includes employer stock (for example, by selling the stock and rolling over the proceeds within 60 days of the payment), the special rule relating to the distributed employer stock will not apply to any subsequent payments from the IRA or employer plan. The Plan administrator can tell you the amount of any net unrealized appreciation.

If you have an outstanding loan that is being offset

If you have an outstanding loan from the Plan, your Plan benefit may be offset by the amount of the loan, typically when your employment ends. The loan offset amount is treated as a distribution to you at the time of the offset and will be taxed (including the 10% additional income tax on early distributions, unless an exception applies) unless you do a 60-day rollover in the amount of the loan offset to an IRA or employer plan.

If you were born on or before January 1, 1936

If you were born on or before January 1, 1936 and receive a lump sum distribution that you do not roll over, special rules for calculating the amount of the tax on the payment might apply to you. For more information, see IRS Publication 575, Pension and Annuity Income.

If your payment is from a governmental section 457 (b) plans

If the Plan is a governmental section 457(b) plan, the same rules described elsewhere in this notice generally apply, allowing you to roll over the payment to an IRA or an employer plan that accepts rollovers. One difference is that, if you do not do a rollover, you will not have to pay the 10% additional income tax on early distributions from the Plan even if you are under age 59½ (unless the payment is from a separate account holding rollover contributions that were made to the Plan from a tax-qualified plan, a section 403(b) plan, or an IRA). However, if you do a rollover to an IRA or to an employer plan that is not a governmental section 457(b) plan, a later distribution made before age 59½ will be subject to the 10% additional income tax on early distributions (unless an exception applies). Other differences are that you cannot do a rollover if the payment is due to an "unforeseeable emergency" and the special rules under "If your payment includes employer stock that you do not roll over" and "If you were born on or before January 1, 1936" do not apply.

If you are an eligible retired public safety officer and your pension payment is used to pay for health coverage or qualified long-term care insurance

If the Plan is a governmental plan, you retired as a public safety officer, and your retirement was by reason of disability or was after normal retirement age, you can exclude from your taxable income plan payments paid directly as premiums to an accident or health plan (or a qualified long-term care insurance contract) that your employer maintains for you, your spouse, or your dependents, up to a maximum of \$3,000 annually. For this purpose, a public safety officer is a law enforcement officer, firefighter, chaplain, or member of a rescue squad or ambulance crew.

If you roll over your payment to a Roth IRA

You can roll over a payment from the Plan made before January 1, 2011 to a Roth IRA only if your modified adjusted gross income is not more than \$100,000 for the year the payment is made to you and, if married, you file a joint return. These limitations do not apply to payments made to you from the Plan after 2009. If you wish to roll over the payment to a Roth IRA, but you are not eligible to do a rollover to a Roth IRA until after 2009, you can do a rollover to a traditional IRA and then, after 2009, elect to convert the traditional IRA into a Roth IRA.

If you roll over the payment to a Roth IRA, a special rule applies under which the amount of the payment rolled over (reduced by any after-tax amounts) will be taxed. However, the 10% additional income tax on early distributions will not apply (unless you take the amount rolled over out of the Roth IRA within 5 years, counting from January 1 of the year of the rollover). For payments from the Plan during 2011 that are rolled over to a Roth IRA, the taxable amount can be spread over a 2-year period starting in 2011.

If you roll over the payment to a Roth IRA, later payments from the Roth IRA that are qualified distributions will not be taxed (including earnings after the rollover). A qualified distribution from a Roth IRA is a payment made after you are age 59½ (or after your death or disability, or as a qualified first-time homebuyer distribution of up to \$10,000) and after you have had a Roth IRA for at least 5 years. In applying this 5-year rule, you count from January 1 of the year for which your first contribution was made to a Roth IRA. Payments from the Roth IRA that are not qualified distributions will be taxed to the extent of earnings after the rollover, including the 10% additional income tax on early distributions (unless an exception applies). You do not have to take required minimum distributions from a Roth IRA during your lifetime. For more information, see IRS Publication 590, Individual Retirement Arrangements (IRAs).

You cannot roll over a payment from the Plan to a designated Roth account in an employer plan.

If you are not a plan participant

Payments after death of the participant. If you receive a distribution after the participant's death that you do not roll over, the distribution will generally be taxed in the same manner described elsewhere in this notice. However, the 10% additional income tax on early distributions and the special rules for public safety officers do not apply, and the special rule described under the section "If you were born on or before January 1, 1936" applies only if the participant was born on or before January 1, 1936.

If you are a surviving spouse. If you receive a payment from the Plan as the surviving spouse of a deceased participant, you have the same rollover options that the participant would have had, as described elsewhere in this notice. In addition, if you choose to do a rollover to an IRA, you may treat the IRA as your own or as an inherited IRA.

An IRA you treat as your own is treated like any other IRA of yours, so that payments made to you before you are age 59½ will be subject to the 10% additional income tax on early distributions (unless an exception applies) and required minimum distributions from your IRA do not have to start until after you are age 72.

If you treat the IRA as an inherited IRA, payments from the IRA will not be subject to the 10% additional income tax on early distributions. However, if the participant had started taking required minimum distributions, you will have to receive required minimum distributions from the inherited IRA. If the participant had not started taking required minimum distributions from the Plan, you will not have to start receiving required minimum distributions from the inherited IRA until the year the participant would have been age 72.

If you are a surviving beneficiary other than a spouse. If you receive a payment from the Plan because of the participant's death and you are a designated beneficiary other than a surviving spouse, the only rollover option you have is to do a direct rollover to an inherited IRA. Payments from the inherited IRA will not be subject to the 10% additional income tax on early distributions. You will have to receive required minimum distributions from the inherited IRA.

Payments under a qualified domestic relations order. If you are the spouse or former spouse of the participant who receives a payment from the Plan under a qualified domestic relations order (QDRO), you generally have the same options the participant would have (for example, you may roll over the payment to your own IRA or an eligible employer plan that will accept it). Payments under the QDRO will not be subject to the 10% additional income tax on early distributions.

If you are a nonresident alien

If you are a nonresident alien and you do not do a direct rollover to a U.S. IRA or U.S. employer plan, instead of withholding 20%, the Plan is generally required to withhold 30% of the payment for federal income taxes. If the amount withheld exceeds the amount of tax you owe (as may happen if you do a 60-day rollover), you may request an income tax refund by filing Form 1040NR and attaching your Form 1042-S. See Form W-8BEN for claiming that you are entitled to a reduced rate of withholding under an income tax treaty. For more information, see also IRS Publication 519, U.S. Tax Guide for Aliens, and IRS Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Entities.

Other special rules

If a payment is one in a series of payments for less than 10 years, your choice whether to make a direct rollover will apply to all later payments in the series (unless you make a different choice for later payments).

If your payments for the year are less than \$200 (not including payments from a designated Roth account in the Plan), the Plan is not required to allow you to do a direct rollover and is not required to withhold for federal income taxes. However, you may do a 60-day rollover.

Unless you elect otherwise, a mandatory cashout of more than \$1,000 (not including payments from a designated Roth account in the Plan) will be directly rolled over to an IRA chosen by the Plan administrator or the payor. A mandatory cashout is a payment from a plan to a participant made before age 62 (or normal retirement age, if later) and without consent, where the participant's benefit does not exceed \$5,000 (not including any amounts held under the plan as a result of a prior rollover made to the plan).

You may have special rollover rights if you recently served in the U.S. Armed Forces. For more information, see IRS Publication 3, Armed Forces' Tax Guide.

FOR MORE INFORMATION

You may wish to consult with the Plan administrator or payor, or a professional tax advisor, before taking a payment from the Plan. Also, you can find more detailed information on the federal tax treatment of payments from employer plans in: IRS Publication 575, Pension and Annuity Income; IRS Publication 590, Individual Retirement Arrangements (IRAs); and IRS Publication 571, Tax-Sheltered Annuity Plans (403(b) Plans). These publications are available from a local IRS office, on the web at www.irs.gov, or by calling 1-800-TAX-FORM.

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Zurich American Life Insurance Company (ZALICO)

Administrative Offices: PO BOX 64361 St. Paul MN 55164-0361 1.800.449.0523

ATTACHMENT B

STATE INCOME TAX WITHHOLDING INFORMATION DOCUMENT

This document is intended to provide you with information regarding state income tax withholding rules applicable to retirement-type distributions by an insurance company, such as ZALICO, in effect as of December, 2017. State laws are subject to change from time to time. The information below is based on ZALICO’s understanding of the relevant laws; ZALICO does not warrant that the information is correct, nor does it undertake to update the information to reflect changes in state laws. This document is not intended or written as specific legal or tax advice and may not be relied on for purposes of avoiding any state tax penalties. Neither ZALICO nor any of its employees or representatives is authorized to give legal or tax advice.

State Income Tax Withholding—General Information

State income tax withholding is based on your legal state of residence as shown in our records. Please notify us if you maintain a different legal residence.

The amount of tax withheld (if any) may be based on whether your payment is a periodic distribution or a non-periodic distribution. A series of payments made at regular intervals over a person’s life or over a period of greater than one year is considered a series of periodic distributions, for example, annuities or installment payments. Any payment as a single-sum or at irregular intervals is a non-periodic distribution.

Please note that regardless of your election with respect to withholding, you may be liable for state income taxes with respect to the taxable portion of payments from ZALICO. In addition, you may be subject to interest or penalties on underpayments of tax. We suggest that you consult with a tax advisor in order to ensure that you make timely tax payments.

The information provided is intended to supplement the information ZALICO has provided to you with respect to federal income tax withholding requirements.

No State Income Tax Withholding

ZALICO will not withhold for state income taxes in the following states. Please elect “no state withholding”:

Alaska - AK	Nevada - NV	Tennessee - TN	Wyoming - WY
Florida - FL	New Hampshire - NH	Texas - TX	
Mississippi - MS	South Dakota - SD	Washington - WA	

Voluntary State Income Tax Withholding

The following states do not require ZALICO to withhold state income taxes on periodic and non-periodic distributions, even though federal income taxes are being withheld. If you wish to have state income tax withheld, you must elect state income tax withholding and indicate on the election form the percentage of the distribution that you wish ZALICO to withhold.

Alabama - AL	Illinois - IL	New York - NY	Utah - UT
Arizona - AZ	Indiana - IN	Montana - MT	Pennsylvania - PA
Colorado - CO	Kentucky - KY	New Jersey - NJ	Rhode Island - RI
Idaho - ID	Louisiana - LA	New Mexico - NM	South Carolina - SC
Hawaii - HI	Minnesota - MN	North Dakota - ND	West Virginia - WV
	Missouri - MO	Ohio - OH	Wisconsin - WI

Required State Income Tax Withholding—Elections Permitted In Certain Circumstances:

The following states generally require ZALICO to withhold state income tax on certain distributions, but permit certain state income tax withholding elections to be made in writing by you. Your distribution form allows you to make this election “in writing.” The requirements and available withholding elections are described below.

State	State Tax W/H Calculation	Non-Periodic Distributions	Periodic Distributions
Arkansas – AR	5% of Taxable Amount Distributed as an eligible rollover distribution. 3% of Other Non-Periodic Taxable Amount Distributed. For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will use the [3%] non-periodic percentage, unless you elect out of withholding.	<u>IRA</u> : State income tax will be withheld, except you may elect out of withholding. <u>403(b)</u> : If an eligible rollover distribution, you may not elect out of withholding. If not an eligible rollover distribution, you may elect out of withholding. <u>Nonqualified</u> : State income tax will be withheld, except you may elect out of withholding.	<u>IRA/403(b)/Nonqualified</u> : State income tax will be withheld, except you may elect out of withholding.
California – CA	For Non-Periodic and Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 10% of Federal Tax Withholding Applicable, unless you elect out of withholding.	<u>IRA/403(b)/Nonqualified</u> : State income tax will be withheld, except you may elect out of withholding.	<u>IRA/403(b)/Nonqualified</u> : State income tax will be withheld, except you may elect out of withholding.

State	State Tax W/H Calculation	Non-Periodic Distributions	Periodic Distributions
Delaware – DE	<p>5% of Taxable Amount Distributed.</p> <p>For Non-Periodic and Periodic Distributions, other than eligible rollover distributions, ZALICO will not withhold any amounts unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage of at least 5%.</p>	<p><u>IRA</u>: Voluntary withholding (minimum 5%).</p> <p><u>403(b)</u>: If an eligible rollover distribution, you may not elect out of withholding. If not an eligible rollover distribution, voluntary withholding (minimum 5%).</p> <p><u>Nonqualified</u>: Voluntary withholding (minimum 5%).</p>	<p><u>IRA/403(b)/Nonqualified</u>: Voluntary withholding (minimum 5%).</p>
District of Columbia – DC	<p>8.95% of Taxable Amount of a Lump Sum Distribution.</p> <p>For other Non-Periodic and Periodic Distributions, ZALICO will not withhold any amounts unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>	<p><u>IRA/403(b)</u>: State income tax withholding is required for a lump-sum distribution of the entire balance.</p> <p><u>IRA/403(b)/Nonqualified</u>: Voluntary withholding for non-periodic distributions not described immediately above.</p>	<p><u>IRA/403(b)/Nonqualified</u>: Voluntary withholding.</p>
Georgia – GA	<p>1% to 6% of Taxable Amount Distributed Applicable to Non-Periodic and Periodic Distributions.</p> <p>For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 6% of Taxable Amount Distributed, unless you elect out of withholding.</p>	<p><u>IRA/403(b)/Nonqualified</u>: Voluntary withholding,.</p>	<p><u>IRA/403(b)/Nonqualified</u>: State income tax will be withheld, except you may elect out of withholding.</p>

State	State Tax W/H Calculation	Non-Periodic Distributions	Periodic Distributions
Kansas – KS	<p>5% of Taxable Amount Distributed as an eligible rollover distribution.</p> <p>For Non-Periodic and Periodic Distributions, other than eligible rollover distributions, ZALICO will not withhold any amounts unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>	<p><u>IRA</u>: Voluntary withholding. <u>403(b)</u>: If an eligible rollover distribution, you may not elect out of withholding. If not an eligible rollover distribution, voluntary withholding. <u>Nonqualified</u>: Voluntary withholding.</p>	<p><u>IRA/403(b)/Nonqualified</u>: Voluntary withholding.</p>
Maryland – MD	<p>7.75% of Taxable Amount Distributed as an eligible rollover distribution.</p> <p>For Non-Periodic and Periodic Distributions, other than eligible rollover distributions, ZALICO will not withhold any amounts unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>	<p><u>IRA</u>: Voluntary withholding. <u>403(b)</u>: If an eligible rollover distribution, you may not elect out of withholding. If not an eligible rollover distribution, voluntary withholding. <u>Nonqualified</u>: Voluntary withholding.</p>	<p><u>IRA/403(b)/Nonqualified</u>: Voluntary withholding.</p>
North Carolina – NC	<p>4% of Taxable Amount Distributed as a Non-Periodic Distribution.</p> <p>For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 4% of Taxable Amount Distributed, unless you elect out of withholding.</p>	<p><u>IRA</u>: State income tax will be withheld, except you may elect out of withholding. <u>403(b)</u>: If an eligible rollover distribution, you may not elect out of withholding. If not an eligible rollover distribution, you may elect out of withholding. <u>Nonqualified</u>: State income tax will be withheld, except you may elect out of withholding.</p> <p>If you elect not to have federal income taxes withheld, state income tax will be withheld unless you elect out of state income tax withholding.</p>	<p><u>IRA/403(b)/Nonqualified</u>: State income tax will be withheld, except you may elect out of withholding.</p> <p>If you elect not to have federal income taxes withheld, state income tax will be withheld unless you elect out of state income tax withholding.</p>

State	State Tax W/H Calculation	Non-Periodic Distributions	Periodic Distributions
Oklahoma – OK	<p>5% of Taxable Amount Distributed as a Non-Periodic Distribution.</p> <p>For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 5% of Taxable Amount Distributed, unless you elect out of withholding.</p>	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld, except you may elect out of state income tax withholding.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld, except you may elect out of state income tax withholding.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>
Oregon – OR	<p>9% of Taxable Amount Distributed as a Non-Periodic Distribution.</p> <p>For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 9% of Taxable Amount Distributed, unless you elect out of withholding.</p>	<p><u>IRA:</u> State income tax withholding is required whenever federal income tax is withheld, except you may elect out of state income tax withholding.</p> <p><u>403(b):</u> If an eligible rollover distribution, you may not elect out of withholding. If not an eligible rollover distribution, you may elect out of withholding.</p> <p><u>Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld, except you may elect out of state income tax withholding.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld, except you may elect out of state income tax withholding.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>
Vermont – VT	<p>24% of Federal Tax Amount Withheld from a Non-Periodic Distribution.</p> <p>For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 24% of Federal Tax Amount Withheld, unless you elect out of withholding.</p>	<p><u>IRA:</u> State income tax will be withheld, except you may elect out of withholding.</p> <p><u>403(b):</u> If an eligible rollover distribution, you may not elect out of withholding. If not an eligible rollover distribution, you may elect out of withholding.</p> <p><u>Nonqualified:</u> State income tax will be withheld, except you may elect out of withholding.</p>	<p><u>IRA/403(b)/Nonqualified:</u> State income tax will be withheld, except you may elect out of withholding.</p>

Mandatory State Income Tax Withholding When Federal Income Tax is Withheld

The following states require ZALICO to withhold state income taxes from distributions when federal income tax is withheld from a distribution and permit you to elect to withhold state income taxes even if you elect to have federal income taxes not withheld. Included in the table are the amounts generally withheld for state income taxes.

State	State Tax W/H Calculation	Non-Periodic Distributions	Periodic Distributions
Iowa - IA	5% of Taxable Amount of Non-Periodic and Periodic Distributions.	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>
Maine - ME	<p>5% of Taxable Amount Distributed as a Non-Periodic Distribution.</p> <p>For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 5% of Taxable Amount Distributed.</p>	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>
Massachusetts - MA	5.10% of Taxable Amount of Non-Periodic and Periodic Distributions .	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>	<p><u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld.</p> <p>If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.</p>

State	State Tax W/H Calculation	Non-Periodic Distributions	Periodic Distributions
Nebraska - NE	5% of Taxable Amount Distributed as a Non-Periodic Distribution. For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 5% of Taxable Amount Distributed.	<u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld. If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.	<u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld. If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.
Virginia - VA	4% of Taxable Amount Distributed as a Non-Periodic Distribution. For Periodic Distributions, please provide ZALICO with a state income tax withholding percentage, otherwise ZALICO will withhold 4% of Taxable Amount Distributed.	<u>IRA:</u> ZALICO will not withhold state income taxes. <u>403(b)/ Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld. If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.	<u>IRA:</u> ZALICO will not withhold state income taxes. <u>403(b)/ Nonqualified:</u> State income tax withholding is required whenever federal income tax is withheld. If you elect not to have federal income taxes withheld, state income tax also will not be withheld unless you elect state income tax withholding, in which case please provide ZALICO with a state income tax withholding percentage.

Mandatory State Income Tax Withholding on all taxable distribution

The following states require ZALICO to withhold state income taxes on all taxable distributions with or without federal income tax withheld. Included in the table are the amounts generally withheld for state income taxes.

State	State Tax W/H Calculation	Non-Periodic Distributions	Periodic Distributions
Michigan - MI	4.25% of Taxable Amount Non-Periodic and Periodic Distributions.	<u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required on all taxable distributions.	<u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required on all taxable distributions.
Connecticut - CT	6.99% of Taxable Amount Non-Periodic and Periodic Distribution.	<u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required on all taxable distributions.	<u>IRA/403(b)/Nonqualified:</u> State income tax withholding is required on all taxable distributions.