Valley View Consultants, Inc.

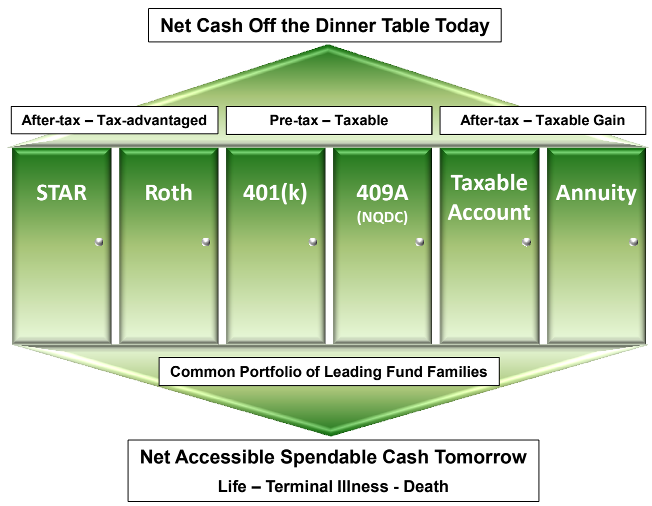
September 7, 2012

VVC Life Events Analysis and FINRA Regulations

The VVC Life Events Analysis utilizes "hypothetical illustrations of mathematical principles", as specified by FINRA Rule 2210(d)(4)(C) (09/2009 proposed, 02/2013 effective) of different financial and benefit plan structures as financial planning support calculations for registered representatives and their clients. Consistent with other hypothetical illustration calculators and reports, the VVC Life Events Analysis is not "sales material" and not an "investment analysis tool" requiring FINRA filing.

While VVC is a third party institutional life insurance analytics and administration firm, and not a FINRA member, it is important that members are aware of VVC's compliance with FINRA's regulations.

VVC Analysis Objectives



- Individuals have multiple structural choices to access leading funds.
- Each structure has different tax, tax deferral, product pricing and fund fees.
- The VVC Analysis Objective is to utilize a common net cash flow and gross market return to illustrate the net accessible cash available to the consumer and their heirs from these structures at any time in the event of life, terminal illness or death.

The basis of VVC's financial modeling methodology and systems is FINRA Rule 2210(d)(4)(C). Enclosed.

Additionally, VVC modeling includes:

- Transaction and annual account fees (where applicable).
- Front load, no-load and deferred load fund structures (where applicable).
- Annual fund re-allocation (where applicable).
- Breakpoint fee discounts (where applicable).
- Advisor compensation disclosure.
- New money contributions and existing money diversification modeling alternatives.
- Structural diversification alternatives.
- Accumulation or spendable cash-flow alternatives (level or inflation adjusted).
- Consumer specified net cash-flow, market returns, allocations, compensation and tax assumptions.

VVC's objective is to provide consumers realistic hypothetical illustrations of the mathematic principles of product structures, pricing structures, tax structures and tax deferral so they and their advisors can make prudent financial planning decisions of the net spendable value these financial structures offer.

Please contact me if you have any questions about VVC analytics and administration services.

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FINRA Rule 2210(d)(4)(C)
Effective February 4, 2013

(C) A comparative illustration of the mathematical principles of tax-deferred versus taxable compounding must meet the following requirements:

(i) The illustration must depict both the taxable investment and the tax-deferred investment using identical investment amounts and identical assumed gross investment rates of return, which may not exceed 10 percent per annum.

(ii) The illustration must use and identify actual federal income tax rates.

(iii) The illustration may reflect an actual state income tax rate, provided that the communication prominently discloses that the illustration is applicable only to investors that reside in the identified state.

(iv) Tax rates used in an illustration that is intended for a target audience must reasonably reflect its tax bracket or brackets as well as the tax character of capital gains and ordinary income.

(v) If the illustration covers the payout period for an investment, the illustration must reflect the impact of taxes during this period.

(vi) The illustration may not assume an unreasonable period of tax deferral.

(vii) The illustration must disclose, as applicable:

a. the degree of risk in the investment's assumed rate of return, including a statement that the assumed rate of return is not guaranteed;

b. the possible effects of investment losses on the relative advantage of the taxable versus the tax-deferred investments;

c. the extent to which tax rates on capital gains and dividends would affect the taxable investment's return;

d. the fact that ordinary income tax rates will apply to withdrawals from a tax-deferred investment;

e. its underlying assumptions;

f. the potential impact resulting from federal or state tax penalties (e.g., for early withdrawals or use on non-qualified expenses); and

g. that an investor should consider his or her current and anticipated investment horizon and income tax bracket when making an investment decision, as the illustration may not reflect these factors.