

LIFE AUDIT UPDATE

1. Reserves
 - a. Actuarial Guidelines – AG 33, 34 ,39, 43
 - b. Section 807(f) issues
 - c. Loss Adjustment Expenses Included in Life Reserves
 - d. Deficiency Reserves Included in Statutory Cap
2. Investments
 - a. Hedging of Variable Annuity Contract Guarantees
 - b. Partial Worthlessness Deductions under Section 166
3. Separate account Dividends Received Deduction
 - a. IRS Examination Developments
 - b. Short Term Capital Gains
 - c. “Tainted” Dividends
 - d. Separate Account vs. Sub Account
4. Securitizations/Captives
 - a. Foreign and Domestic
 - b. What Constitutes Insurance
5. Foreign Linked Insurance Policies
6. Split Dollar Life Insurance Products – IRS Examination Developments
7. Interaction Between IRS Examination, IRS Counsel, and the Treasury Department
 - a. Relatively new IRS Programs (CAP, LIFE, IIR)
 - b. Schedule UTP