ComplianceUpdate

June 3, 2010
Number: 0335

AVIVA

Veteran's Benefit Program

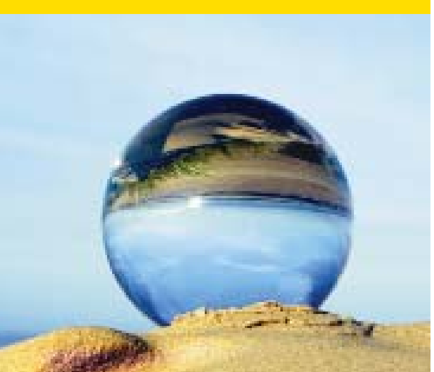
Aviva is committed to working with our agents in providing honest, fair and full information to all prospective clients to assist them in making appropriate purchases. The purpose of this bulletin is to emphasize how Aviva's policies on Advertising Guidelines, Pretextual Interviews and Unauthorized Practice of Law apply to agents' use of veteran's benefits marketing programs in connection with an insurance sale.

Aviva recognizes the many legitimate reasons for agents to market the availability of veteran's benefits programs. Unfortunately, some of these marketing approaches can be considered improper pretextual interviews because they:

- Misrepresent the purpose of the agents' contact with the veteran as solely to assist in obtaining Aid and Attendance pension benefits, often for free, when the real goal is to solicit an annuity;
- Misconstrue the agents' identity and might imply the agent is working for a non-profit association

Aviva will not allow any sales of its product through the use of marketing or sales concepts in conjunction with veterans benefit assistance unless the concept and associated marketing materials are approved by Aviva <u>prior</u> to use.

Regulators are increasingly concerned about insurance agents promoting themselves as disinterested advisors, such as "VA Benefits Counselors." Advertising and promotional material that obscures the fact that the agent is a licensed insurance professional or the fact that one of the ultimate purposes of the seminar, workshop or meeting is the solicitation of an insurance product may subject Aviva and you to regulatory fines, penalties and possible loss of your license.



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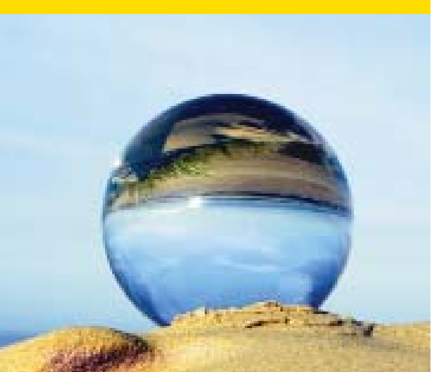
Below are Do's and Don'ts to assist you in complying with our policies and avoiding potential issues with State Insurance Departments:

- Do clearly identify yourself as an insurance agent without any implication that you are associated with or work for a governmental agency.
- Do clearly disclose that the Veteran's benefit assistance is not your principal business but rather an additional service as part of helping clients with overall insurance planning needs.
- Do clearly differentiate and disclose between services you provide and other professionals you work with to ensure the client understands your respective roles.
- Do submit all marketing materials you use in conjunction with all solicitations such as lead cards, seminar invites and presentations-if they are not, the application will be rejected.
- Don't imply that you are able to advise a client on the sufficiency of their estate planning documents
- Don't share any legal fees that a client may pay to an attorney

Comments or questions on this bulletin may be directed to Maureen Closson, Chief Compliance Officer



Doing business the Aviva way!