



October 5, 2019

Submitted electronically to:

Jolie Matthews at jmatthews@naic.org

Jennifer McAdam at jmcadam@naic.org

TO: Members of the Annuity Suitability Working Group
Director Jillian Froment, Ohio Department of Insurance
Chair, Annuity Suitability Working Group

FROM: Kim O'Brien, FACC Spokesperson
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RE: September 2019 Working Group Draft Comments & Redline

Dear Ms. Matthews:

Jolie, as indicated in our submission earlier this week, we have continued to work on the redline and are now submitting an updated version with further suggested edits. We ask that you incorporate these additional edits into your summary chart. You will see in some cases we also provide further commentary to clarify our position or explain what we did with the redline. This redline should be considered in conjunction with our comment letter dated September 30, 2019.

Thank you again for consideration of these comments and our abbreviated redline suggestions.

Respectfully submitted,

Kim O'Brien
FACC Campaign
Vice Chair Americans for Asset Protection

Attachment: FACC Redline_Model #275 Sept Draft_100419F