

If you own or owned a UL or VUL life insurance policy issued or insured by ReliaStar Life Insurance Company or its predecessors, your rights may be affected by a class action lawsuit

A court authorized this notice. This is not a solicitation from a lawyer.

- Advance Trust & Life Escrow Services, LTA, as securities intermediary for Life Partners Position Holder Trust, and Alice Curtis (“Plaintiffs”), have filed a class action against ReliaStar Life Insurance Company (“Defendant”) for allegedly imposing unlawful cost of insurance (“COI”) charges and waiver rider (“Rider”) charges on certain universal life and variable universal life policy owners. The allegations against Defendant are described in Plaintiffs’ First Amended Complaint filed with the Court on February 24, 2020.
- The Court has allowed the lawsuit to proceed as a class action against Defendant on behalf of two Classes. The first is a Class consisting of all current or former owners of universal life policies issued on the following Policy Forms issued or insured by Defendant, or its predecessors, during the Class Period: 82-358, 82-500, 82-501, 82-502, 82-503, 82-508, 82-509, 83-187, 83-300, 83-301, 83-302, 83-303, 83-304, 83-305, 83-306, 83-307, 83-308, 83-309, 10820, 10820PA, 10830, 10830 PA, 10840, 10890, 10910, 10980, 10980MN, 11021F, 11021FMN, 11060, 11060MN, 11060-U, 11060-P, 11065, 11260, 11260MN, 11265, 73853-0, and 614680. The second is a Class of all current or former owners of universal life policies issued on the following Policy Forms issued or insured by Defendant, or its predecessors, during the Class Period who were assessed Rider charges during the Class Period: 10830 and 10910. The Class Period is defined in Section 6 of this Notice. The Court has also denied ReliaStar’s motion for summary judgment, and the Court, following a stipulation of the parties, has precluded ReliaStar from filing another summary judgment motion. This Notice is to inform you of the certification of the Classes, the nature of your claims, and your right to exclude yourself from the Classes.
- The Court has not decided whether any laws were broken. There is no money available now and no guarantee there ever will be. However, if you are a member of the Classes as described in this Notice, your rights are affected, and you have a choice to make now.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS CLASS ACTION	
DO NOTHING	Stay in this lawsuit and await the outcome. By doing nothing, the certification ruling means that any judgment in this case – whether favorable to Plaintiffs or Defendant – will bind all Class Members who do not timely elect to be excluded from the Classes in the manner described below.
ASK TO BE EXCLUDED	Get no benefits from lawsuit. Keep certain rights. If you ask to be excluded from this lawsuit and money is later awarded, you will not be allowed to request a payment. But, you preserve any rights to sue Defendant at your own expense and with your own attorney about the same legal claims asserted in this lawsuit.

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BASIC INFORMATION

1. Why was this Notice issued?

This Notice explains that a Court “certified” two Classes. The first is a “COI Class” consisting of all current and former owners of universal life policies issued on the following Policy Forms issued or insured by Defendant, or its predecessors, during the Class Period: 82-358, 82-500, 82-501, 82-502, 82-503, 82-508, 82-509, 83-187, 83-300, 83-301, 83-302, 83-303, 83-304, 83-305, 83-306, 83-307, 83-308, 83-309, 10820, 10820PA, 10830, 10830 PA, 10840, 10890, 10910, 10980, 10980MN, 11021F, 11021FMN, 11060, 11060MN, 11060-U, 11060-P, 11065, 11260, 11260MN, 11265, 73853-0, and 614680 (the “COI Class Policies”). The second is a “Rider Class” consisting of all current or former owners of universal life policies issued on the following Policy Forms issued or insured by Defendant, or its predecessors, who were assessed Rider charges during the Class Period: 10830 and 10910 (the “Rider Class Policies”). The Class Period is defined in Section 6 of this Notice. If this describes you, you may choose to stay in the lawsuit, or exclude yourself from it, prior to August 8, 2022.

Judge Donovan W. Frank of the United States District Court for the District of Minnesota is overseeing this lawsuit, known as *Advance Trust & Life Escrow Services, LTA et al. v. ReliaStar Life Insurance Company*, Case No. 0:18-cv-2863-DWF-BRT (D. Minn.), and has determined that the breach of contract claims against Defendant can proceed as a class action. The Court has also denied Defendant’s motion for summary judgment against Plaintiffs.

2. What is this lawsuit about?

The class action lawsuit alleges that Defendant breached its contracts with certain policy owners. Plaintiffs allege that Defendant breached the COI Class Policies because Defendant imposed COI charges that were not based on Defendant’s expectations as to future mortality experience, and that Plaintiffs and members of the COI Class have been damaged as a result. Plaintiffs further allege that Defendant breached the Rider Class Policies by deducting Rider charges using rates that exceed the Rider rates expressly set forth in the Rider Class Policies. Defendant denies Plaintiffs’ claims and asserts multiple defenses.

On March 29, 2022, the United States District Court for the District of Minnesota granted Plaintiffs’ motion for class certification against Defendant. In that same March 29, 2022 Order, the Court denied ReliaStar’s motion for summary judgment. The Court’s order certifying the Classes and denying ReliaStar’s motion for summary judgment does not predict nor guarantee that Class Members will receive any money or benefits; that will be decided later.

3. Which life insurance policies are affected by the lawsuit?

The Court certified two classes. The first is the COI Class, which consists of “[a]ll current and former owners of UL (including variable UL) policies insured by ReliaStar” written on the following policy forms “who were assessed COI charges during the Class Period”: 82-358, 82-500, 82-501, 82-502, 82-503, 82-508, 82-509, 83-187, 83-300, 83-301, 83-302, 83-303, 83-304, 83-305, 83-306, 83-307, 83-308, 83-309, 10820, 10820PA, 10830, 10830 PA, 10840, 10890, 10910, 10980, 10980MN, 11021F, 11021FMN, 11060, 11060MN, 11060-U, 11060-P, 11065, 11260, 11260MN, 11265, 73853-0, and 614680. The second is the Rider Class, which consists of “[a]ll current and former owners of universal life policies insured by ReliaStar written on policy forms 10830 and 10910 . . . who were assessed Waiver Rider charges during the Class Period.” The Class Period is defined in Section 6 of this Notice.

4. What is a class action and who is involved?

In a class action, one or more persons or entities, called a “Class Representative” or “Class Representatives,” sue on behalf of all individuals who have a similar claim. Here, Plaintiff Advance Trust & Life Escrow Services, LTA, as securities intermediary for Life Partners Position Holder Trust, and Alice Curtis, have been appointed by the Court to represent other eligible owners of the COI Class Policies. Plaintiff Advance Trust & Life Escrow Services, LTA, as securities intermediary for Life Partners Position Holder Trust, has also been appointed by the Court to represent other eligible owners of the Rider Class Policies. Together, all of these eligible owners are called the “Class” or “Class Members.” The persons who sued are called the “Plaintiffs;” a party being sued, such as ReliaStar Life Insurance Company, is called a “Defendant.”

Any judgment in this case will resolve the issues for all Class Members, except for those who exclude themselves from the Classes. Class Members might receive money and/or other benefits if they stay in the Classes and if one or both of the Classes prevails on the merits; and Class Members might receive nothing if they stay in the Classes and Defendant prevails on the merits.

5. Why is this lawsuit a class action?

The Court decided that the breach of contract claims against Defendant in this lawsuit can proceed as a class action because, at this point in the lawsuit, they meet the requirements of Rule 23 of the Federal Rules of Civil Procedure, which governs class actions in federal court. The Court found that:

- there are numerous Class Members whose interests will be affected by this lawsuit;
- there are legal questions and facts that are common to each of them;
- the Class Representatives’ claims are typical of the claims of the rest of the Classes;
- the Class Representatives and the lawyers representing the Classes will fairly and adequately represent the interests of the Classes;
- a class action would be a fair, efficient and superior way to resolve this lawsuit; and
- the common legal questions and facts predominate over questions that affect only individual Class Members.

For more information, visit the Important Documents page at www.ReliasStarCOILitigation.com.

WHO IS IN THE CLASS

6. Am I part of this class action?

The COI Class consists of all current and former owners of universal life policies issued on the following Policy Forms issued or insured by ReliaStar Life Insurance Company, or its predecessors, who were assessed COI charges during the Class Period: 82-358, 82-500, 82-501, 82-502, 82-503, 82-508, 82-509, 83-187, 83-300, 83-301, 83-302, 83-303, 83-304, 83-305, 83-306, 83-307, 83-308, 83-309, 10820, 10820PA, 10830, 10830 PA, 10840, 10890, 10910, 10980, 10980MN, 11021F, 11021FMN, 11060, 11060MN, 11060-U, 11060-P, 11065, 11260, 11260MN, 11265, 73853-0, and 614680.

The Rider Class consists of all current and former owners of universal life policies issued on the following Policy Forms issued or insured by ReliaStar Life Insurance Company, or its predecessors, during the Class Period who were assessed Rider charges during the Class Period: 10830 and 10910.

The “Class Period” starts on the following dates through the date of final judgment in this action:

Start Date of Class Period	Policy Issue State
October 5, 2003	Kentucky
October 5, 2008	Illinois, Indiana, Iowa, Louisiana, Rhode Island, West Virginia
October 5, 2010	Montana, Ohio
October 5, 2012	Alabama, Arizona, Connecticut, Georgia, Hawaii, Maine, Massachusetts, Michigan, Minnesota, Mississippi, Nevada, New Jersey, North Dakota, Oregon, South Dakota, Tennessee, Utah, Vermont, Wisconsin
October 5, 2013	Florida, Idaho, Kansas, Missouri, Nebraska, Oklahoma
October 5, 2014	California, Pennsylvania, Texas

7. Are there exceptions to being included?

Yes. Excluded from the Classes are current or former owners of the COI Class Policies or Rider Class Policies issued in Alaska, Arkansas, New Mexico, New York, Virginia, Washington, and Wyoming; and Defendant ReliaStar Life Insurance Company, its officers and directors, members of their immediate families, and their heirs, successors, or assigns. Also excluded from the COI Class are current or former owners of the policies listed in Exhibit A.

8. What happens if I do nothing at all?

By doing nothing, you will remain in the Class(es). If you remain in the Class(es) and Plaintiffs obtain money or other value from this lawsuit—either as a result of any ruling, trial, or Court-approved settlement—you may receive a payment, if you are entitled to one. Keep in mind that if you do nothing now, regardless of whether Plaintiffs win or lose, you will be legally bound by all Court orders and judgments made in this class action and you will not be able to maintain a separate lawsuit against Defendant for the same legal claims that are the subject of this lawsuit.

9. I am still not sure if I am included.

If you're still not sure whether you are included in the Classes, please visit www.ReliaStarCOILitigation.com, call the Notice Administrator toll-free at 1-888-681-2090, or write to: ReliaStar COI Notice Administrator, c/o JND Legal Administration, P.O. Box 91307, Seattle, WA 98111.

10. What happens if I ask to be excluded?

If you exclude yourself (or “opt out”) from either Class, you will not receive any distribution that may result from a judgment or settlement favorable to Plaintiffs. If you exclude yourself, you will also not be legally bound by the Court’s orders and judgments in this class action. You may sue or continue to sue Defendant for the same legal claims that are the subject of this lawsuit. If you choose to pursue your own lawsuit against Defendant, you may hire a lawyer at your own expense to prove your alleged claims.

11. How do I ask to be excluded?

To exclude yourself, you must send a letter to the Notice Administrator requesting exclusion from the *Advance Trust & Life Escrow Services, LTA et al. v. ReliaStar Life Insurance Company*, Case No. 0:18-cv-2863-DWF-BRT (D. Minn.) class action, with your name, address, telephone number, email address, and signature. You must also identify your COI Class Policy or Policies and/or Rider Class Policy or Policies to be excluded. Your exclusion request must be postmarked no later than August 8, 2022. Send your exclusion request to: ReliaStar COI Notice Administrator, c/o JND Legal Administration, P.O. Box 91307, Seattle, WA 98111. If you own multiple COI Class Policies or Rider Class Policies that are included in the Classes, you may request to exclude some policies from the Classes, while participating in the Classes with respect to other policies.

IF YOU DO NOT EXCLUDE YOURSELF BY AUGUST 8, 2022, YOU WILL REMAIN PART OF THE CLASS(ES) AND BE BOUND BY THE ORDERS OF THE COURT IN THIS LAWSUIT.

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes. The Court has appointed the following lawyers as “Class Counsel.”

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13. How will the lawyers be paid?

Class Counsel will represent your interests in presenting the claims against Defendant. You will not be personally responsible for Plaintiffs’ attorneys’ fees or costs, except to the extent that the Court may approve or award any such fees and costs to Class Counsel, which could be paid by Defendant directly or out of the recovery in this action, if any.

14. Should I get my own lawyer?

If you stay in the Classes, you do not need to hire your own lawyer to pursue the claims against Defendant because Class Counsel is working on behalf of the Classes. However, if you want to be represented by your own lawyer, you may hire one at your own expense and cost.

GETTING MORE INFORMATION

15. Are more details available?

Yes. Key Dates and Important Documents related to the lawsuit can be found at www.ReliaStarCOILitigation.com. For additional assistance, contact the Notice Administrator by calling, toll-free, 1-888-681-2090 or write to: ReliaStar COI Notice Administrator, c/o JND Legal Administration, P.O. Box 91307, Seattle, WA 98111.

PLEASE DO NOT CONTACT THE COURT OR RELIASTAR LIFE INSURANCE COMPANY WITH ANY QUESTIONS YOU HAVE CONCERNING THIS MATTER. ALL QUESTIONS SHOULD BE DIRECTED TO THE NOTICE ADMINISTRATOR OR CLASS COUNSEL.

Exhibit A

1785320	005009219H	00W0001060	CBS0114895	SC1073227R
1798081	005009243H	00W0001108	CBS0114896	SC1073913R
1798861	005009279E	00W0001164	CBS0116584	SC1074002H
1804847	005009305R	00W0001194	CBS0117545	SC1074784B
1806377	005009362D	00W0001195	CBS0122127	SC1075356E
1813308	005009374H	00W0001379	CBS0127499	SC1076825H
1813756	005009440J	00W0001380	CBS0127613	SC1077009R
1816050	005009623E	00W0001388	CBS0127662	SC1078252G
1819096	005009715J	00W0001456	CBS0127710	SC1081566G
1819401	005009791G	00W0001485	CBS0128106	SC1086528D
1819678	005009803J	00W0001548	CBS0128129	SC1088074R
1820540	005009828W	00W0001551	CBS0129830	SC1088867R
1824198	005009838J	00W0001570	CBS0130607	SC1092812G
1826018	005009854J	00W0001597	CBS0131241	SC1093766B
1829179	005009865X	00W0001733	CBS0131270	SC1096002M
1829237	005010021D	00W0001767	CBS0134866	SC1096087W
1829318	005010064D	00W0001870	CBS0136345	SC1098676D
1833769	005010196X	00W0001871	CBS0136844	SC1100232E
1845164	005010220W	00W0001974	CBS0137033	SC1105556G
1851738	005010365R	00W0002078	CBS0137515	SC1107829R
1851987	005010370G	00W0002082	CBS0138291	SC1107963M
1853197	005010373R	00W0002087	CBS0138445	SC1114110G
1853209	005010393B	00W0002088	CBS0138526	SC1114153G
1853841	005010394W	00W0002105	CBS0138623	SC1114627B
1854295	005010400D	00W0002259	CBS0139721	SC1115975X
1854306	005010418G	00W0002291	CBS0139772	SC1118494M
1854716	005010456E	00W0002312	CBS0139950	SC1121201E
1855527	005010693W	00W0002401	CBS0140390	SC1121556G
1857124	005010835E	00W0002450	CBS0141919	SC1122725M
1858281	005010849D	00W0002491	CBS0143958	SC1123765R
1858750	005010910D	00W0002615	CBS0145418	SC1127939W
1860281	005010912R	00W0002681	SC0397399B	SC1129613X
1860285	005010985M	00W0002760	SC0504453R	SC1131537X
1860398	005010993M	00W0002780	SC0529878D	SC1133240D
1860518	005011019K	00W0002795	SC0534754M	SC1133962X
1860532	005011033X	00W0002838	SC0543476G	SC1134549W
1860790	005011121X	00W0002901	SC0556445G	SC1135234W
1861166	005011137J	00W0002918	SC0568452M	SC1135237G
1861247	005011138G	00W0002983	SC0573011K	SC1139445B
1861250	005011200D	00W0003016	SC0575509X	SC1145496X
1861766	005011210R	00W0003038	SC0586154K	SC1149669E
1862222	005011343H	00W0003043	SC0591531G	SC1152871D
1862454	005011421R	00W0003077	SC0595346M	SC1153269X
1862483	005011434W	00W0003082	SC0596500G	SC1154132K
1863605	005011494M	00W0003178	SC0599595R	SC1156093B
1863630	005011495J	00W0003239	SC0600336M	SC1157339J
1863648	005011501R	00W0003240	SC0601328E	SC1157592D
1864184	005011516J	00W0003430	SC0603042W	SC1158915D
1864460	005011517G	00W0003457	SC0604708M	SC1159532H
1864818	005011581W	00W0003504	SC0606449G	SC1163695R
1864830	005011638M	00W0003549	SC0614409R	SC1167824E

1865284	005011661W	00W0003550	SC0615154K	SC1168116W
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1865490	005011679B	00W0003624	SC0618125D	SC1169367X
1866846	005011716B	00W0003647	SC0618382B	SC1170291W
1867037	005011783B	00W0003756	SC0625656M	SC1172654X
1867404	005011913D	00W0003764	SC0627128D	SC1180038G
1867487	005011935B	00W0003765	SC0629079X	SC1180106B
1868067	005011943B	00W0003793	SC0634149M	SC1180702H
1868108	005011956D	00W0003796	SC0639158E	SC1180976M
1868271	005012054K	00W0003801	SC0639559D	SC1181124E
1868494	005012055H	00W0003806	SC0640583G	SC1182202D
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1869496	005012189W	00W0003834	SC0649399E	SC1184085E
1869502	005012244J	00W0003837	SC0649925D	SC2258815B
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1869514	005012460B	00W0003889	SC0655178J	SC2271674W
1870287	005012544G	00W0003890	SC0655877K	SC2283217K
1870559	005012622M	00W0003919	SC0656407K	SC2290102B
1871218	005012679K	00W0003949	SC0660107K	SC2474438B
1871420	005012888X	00W0004027	SC0661323M	
1871436	005013072R	00W0004084	SC0666392B	
1871444	005013920H	00W0004099	SC0666637D	
1871537	005013967M	00W0004144	SC0670893B	
1871717	005013972E	00W0004256	SC0673616J	
1871742	005014006D	00W0004440	SC0673723X	
1871838	005014044B	00W0004513	SC0675424B	
1872371	005014274J	00W0004560	SC0675480K	
1873083	005014291G	00W0004585	SC0675710X	
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1874341	005014467W	00W0004662	SC0676738G	
1874720	005014480H	00W0004765	SC0678216D	
1875292	005014490B	00W0004779	SC0682070G	
1875437	005014546B	00W0004857	SC0685057H	
1875731	005014715W	00W0004874	SC0686064D	
1875733	005014751D	00W0004968	SC0688345K	
1875816	005014801E	00W0004979	SC0688347E	
1875998	005014823D	00W0005020	SC0688355E	
1876282	005014892R	00W0005076	SC0689123M	
1877396	005014999R	00W0005092	SC0689778K	
1877526	005015224W	00W0005220	SC0691896E	
1877696	005015238R	00W0005221	SC0692403J	
1877722	005015271K	00W0005268	SC0694171K	
1878036	005015375D	00W0005284	SC0694897M	
1878305	005015727M	00W0005317	SC0695146G	
1878674	005015820E	00W0005390	SC0696846R	
1879569	005016252M	00W0005436	SC0698984B	
1879746	005016262G	00W0005536	SC0700650B	
1880405	005016291H	00W0005571	SC0701336H	
1881103	005016536J	00W0005590	SC0702905W	

1881310	005016680B	00W0005711	SC0704640K	
1881339	005016717K	00W0005724	SC0705923D	
1881765	005016947B	00W0005736	SC0707180H	
1881812	005017020D	00W0005797	SC0708368R	
1882092	005017022R	00W0005898	SC0708794J	
1882174	005017145R	00W0005980	SC0709850J	
1882241	005017232X	00W0005981	SC0713471G	
1882246	005017375E	00W0005989	SC0717724K	
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1886361	005017678J	00W0006220	SC0722900X	
1886540	005017683B	1U01233040	SC0723574D	
1886542	005017748W	1U01236600	SC0723736R	
1887525	005017752K	1U01240810	SC0725185K	
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1887823	005018178M	1U01251460	SC0729548R	
1888797	005018179J	1U01253050	SC0731184M	
1889010	005018192B	1U01256190	SC0733147M	
1889026	005018230W	1U01259050	SC0733251M	
1889081	005018243X	1U01262260	SC0735741J	
1889242	005018244R	1U01266710	SC0736848B	
1889420	005018345W	1U01267910	SC0738644G	
1889528	005018453D	1U01268310	SC0739399G	
1890811	005018469M	1U01268830	SC0739937J	
1890916	005018494J	1U01269280	SC0740557W	
1891376	005018519R	1U01270210	SC0743177M	
1891468	005018595K	1U01272060	SC0744050X	
1891828	005018796X	1U01272390	SC0745306B	
1891833	005018909E	1U01272510	SC0745490D	
1892474	005019080B	1U01272550	SC0745492R	
1892550	005019233W	1U01273300	SC0746856D	
1892811	005019532W	1U01273310	SC0747902J	
1893561	005019535G	1U01273920	SC0747904D	
1893883	005019564H	1U01274180	SC0747983H	
1893943	005019700W	1U01275260	SC0749172W	
1894317	005019816M	1U01275970	SC0750208R	
1895464	005019833J	1U01275980	SC0752762D	
1895714	005019842G	1U01275990	SC0752858M	
1896051	005019854K	1U01276020	SC0753002X	
1897616	005019921J	1U01276240	SC0753722D	
1897934	005019922G	1U01276270	SC0754185G	
1898764	005019945B	1U01279700	SC0754838J	
1898805	005019960E	1U01280340	SC0755748H	
1898810	005019967X	1U01281210	SC0758743X	
1899090	005019977K	1U01281530	SC0762041E	
1899353	005020003K	1U01281590	SC0763576D	
1900503	005020052X	1U01281920	SC0764207E	
1900586	005020132X	1U01285280	SC0769066H	

1901312	005020218W	1U01286020	SC0771124E	
1902189	005020262D	1U01286090	SC0773273X	
1902736	005020349W	1U01286540	SC0773400K	
1903262	005020390M	1U01287530	SC0773575H	
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