

EXHIBIT D



Western Reserve Life Assurance Co. of Ohio
Florida Office

February 9, 2004

WRL04-02 – ALL STATES

INSURANCE COMPLIANCE BULLETIN

**WRL'S PROCEDURAL GUIDELINES FOR PRODUCERS
AS TO ANNUITY CONTRACTS**

As you are aware, there is currently a great deal of scrutiny surrounding the activities of financial service providers. Much attention has focused on fraud, unethical practices, inappropriate accounting, and now, trading practices in the mutual fund industry. This, coupled with a new focus on homeland security that requires us to know more about our customers and be watchful for money laundering activities, makes now a good time to remind you of the policies of Western Reserve Life Assurance Co. of Ohio ("WRL") in these areas.

State and federal rules and regulations require us to more closely scrutinize the sale of annuities and life insurance, as well as the structure of the annuity contract. As always, WRL will continue to look for suspicious activities, including third-party checks sent with applications, non-natural persons named as an owner or beneficiary plus applications submitted with no apparent relationship between owner/beneficiary/annuitant, or submitted premiums in the form of cash equivalents (e.g., money order and cashier's checks).

In accordance with the above comments, WRL will not accept annuity applications where the contract owner/applicant does not have an appropriate insurable interest in the life of the annuitant. If the applicant is a pension, profit sharing or 401(k) plan, we may decline the application if the annuitant is not a participant in the plan.

These policies are effective immediately. Any applications currently in process that do not comply with these requirements will be followed up on and possibly returned.

If you have any questions about this, please call WRL's Sales Support Desk at 1-800-443-9975, extension 6567 or Janet Smithson at extension 3314.



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PLEASE DISCUSS THE CONTENTS OF THIS BULLETIN AT YOUR NEXT COMPLIANCE MEETING. A COPY SHOULD BE MAINTAINED IN YOUR OFFICE WITH ALL OTHER COMPLIANCE BULLETINS AND MEMORANDUMS.