

Agent Advertising Guidelines

presented by
Guggenheim Life and Annuity Company

OVERVIEW

A. What is Advertising?

B. Advertising Applicability

C. Advertising Approval Guidelines: Form and Content Rules

D. Advertising Approval Guidelines: Identity of Insurer, Product and Agent in Advertising

E. Advertising Approval Guidelines: Advertising Procedures

F. Glossary

A. WHAT IS ADVERTISING?

Material designed to create public interest in life insurance or annuities, or in an insurer, or in an insurance producer; even though a specific product or company is not mentioned; or to induce the public to purchase, increase, modify, reinstate, borrow on, surrender, replace or retain a contract, is considered advertising.

Advertising includes printed, published, or audio visual materials, including brochures, letters, videos, advertisements, or articles, distributed in any medium, including newspapers, magazines, billboards, mail, direct sales presentations, Internet, business cards, or stationery.

Advertising does not include communications or materials used within an insurer's own organization which are not intended for dissemination to the public. Advertising does not include individualized communications with clients which do not fit the description above.

B. ADVERTISING APPLICABILITY

These rules shall apply to any annuity or life insurance advertisement intended for dissemination to the public. All advertisements (including agent advertising) that include the Guggenheim Life and Annuity Company name, the word Guggenheim, the name of any Guggenheim affiliate or which refers to Company products (whether or not the specific Company or product name is mentioned) must be reviewed and approved by the Company prior to use. Agents and marketing organizations must review, at least once a year, the Advertising Approval Guidelines stated below, which are also available on the Agent Website. These rules apply to the use of social media sites such as Facebook, Twitter and LinkedIn to solicit or induce a person to purchase or inquire about a life insurance or annuity product.

C. ADVERTISING APPROVAL GUIDELINES: FORM AND CONTENT RULES

Advertisements shall be truthful and not misleading in fact or by implication. They should be sufficiently complete, balanced and clear so as to avoid deception. Advertisements must include limitations or negative features if positive features are discussed. Insurance terms identifying the extent or nature of the contract must be defined, if not broadly known by the buying public.

All statistics shall be recent and relevant. Source of statistics must be disclosed.

Non-guaranteed elements must be based on insurer's current scale and must contain a statement that they are not guaranteed. (Examples: "Current Company practice" or "Subject to change"). Non-contractual features may not be advertised in some states.

If non-guaranteed elements are illustrated, guaranteed elements must be illustrated in equal prominence.

Use of the following terms is prohibited: “CD Annuity”, “certificate of annuity”, “deposit”, “savings”, “savings account”, “contributions”, “investment”, “profit”, “profit sharing”, “plan”, “investment plan”, “founder’s plan”, “charter plan”, “expansion plan”, “interest plan”, “savings plan”, “investment department”, “insured investment department”, “approved by the Insurance Department”, “savings annuity plan”, “securities annuity plan”, “tax savers plan”, “units of participation” or any similar terms.

Use of unsubstantiated terms is prohibited, unless supported, such as: “best”, “full”, “all”, “highest”, “most”, “largest”, “free”, “safest”, “no cost”, “without cost”, “no additional cost”, “no extra cost”, “risk free”, “guaranteed safe”, “no red tape”, “special”, “limited”, “vanishing” or “vanishing premium”.

Premium must always be referred to as “premium”.

May not refer to “savings” in reference to cash value.

Terms such as “No load” and “no sales charge” must also reference surrender charges.

No person shall advertise capital or assets of the insurer without setting forth the amount of liabilities in same advertisement. (Can use assets under management alone.)

Must not state that purchaser will share in percentage or portion of insurer’s general account.

Generic features must not be listed as special or particular to the contract; and must be identified as features generic to all such contracts of that type.

Limitations should not be worded positively to imply a benefit and must be clearly defined.

Material may not compare contracts or policies, benefits or marketing methods of other insurers. Also, material may not disparage other insurers, producers, services or methods of marketing.

Materials may not make comparison with other investment vehicles (SEC-controlled).

D. ADVERTISING APPROVAL GUIDELINES: IDENTITY OF INSURER, PRODUCT AND AGENT IN ADVERTISING

Full legal names of insurers must be used when specific products are advertised. The first reference must use the full company name. Additional references thereafter may use a shortened version.

If the advertising piece references or describes Guggenheim Life and Annuity Company products or services, it must be approved by the Company prior to use and the following guidelines apply:

The agent’s or agency’s name and their address and/or phone number must appear, if agent or agency is the one advertising.

The name of insurer and, if applicable, the form number(s) or form code(s) of the product(s) being promoted must be clearly identified.

(Example: Contract issued by Guggenheim Life and Annuity Company, 401 Pennsylvania Parkway, Suite 300, Indianapolis, Indiana 46280 on Form Series GLA.)

This is how to use our company names:

First Reference or Most Prominent Reference: Guggenheim Life and Annuity Company

All California References: Guggenheim Life and Annuity Insurance Company

All Other References: Guggenheim Life

Reputation or reference to any financial measurements or metrics (such as total assets under management) of the parent or any subsidiary may not be used in conjunction with the issuing company.

May not in any way imply that a company other than the insurer has any responsibility for the financial obligations under the contract.

May not in any way imply that the insurer is affiliated with any governmental program or agency, through text or graphics (name, service mark, slogan, symbol or any device).

Non-licensed distributors must not be mentioned and should not appear in advertising.

Must not mention State Insurance Guaranty Association in advertising.

A product name used in marketing must not give the impression of being a company or organization.

Must prominently describe the type of insurance advertised; (example: single premium deferred annuity), at the front or beginning of material.

Must use complete marketing name of product.

If the advertisement is intended for use as an email, the email heading must follow all advertising guidelines.

Insurance producers may use terms: "insurance agent", "insurance specialist" and "insurance professional".

Insurance producers may not use the following terms unless the producer holds a certification from the state and is actually compensated for such services: "Financial Planner", "Financial Consultant", "Financial Counselor", "Investment Advisor", "Retirement Planner", "Pension Specialist", "Retirement Specialist", and "Mortgage Specialist".

With use of any of these titles, proof of certification is required to be submitted to the Company along with the submission for approval for use. Additionally, several states have disclosure rules when an insurance producer is compensated by a consumer in addition to or in lieu of a commission. Compliance with any compensation disclosure requirements will be the responsibility of the insurance producer.

No "Mortgage Protection" programs or use of the term "in event of disability".

No advertisement should use the "effective annual yield" as this is a securities term that may be confusing to clients.

E. ADVERTISING APPROVAL GUIDELINES: ADVERTISING PROCEDURES

All advertising must comply with the regulations of the state in which the advertising is used. For this reason, your agent contract specifies that all advertising that references the Company's products or services be approved by the Company prior to use. The use of an advertisement without the Company's prior approval can lead to termination of your agent contract. Advertisements submitted to the Company will be reviewed within three (3) business days. Some states require advertisements be filed with its department of insurance before being used in the state. If an advertisement is approved, the Company will notify you of any limitations on when the advertisement may first be used.

All client and agent recruiting materials not produced by the Company must be approved prior to publication or use.

Proposed advertisements must be submitted to the Company by an email addressed to the Vice President of Marketing, whose email address is available on the Company website, or a fax to the Marketing Division at 317 574 6278 or by mail addressed to Guggenheim Life and Annuity Company, ATTN: Marketing Division, 401 Pennsylvania Parkway, Suite 300, Indianapolis, Indiana 46280. The submission must include the following information:

Agent/Contact Name; Agency/Marketing Organization; Telephone number; Name of Publication/Medium; Quantity of Distribution; Audience type; States where advertisement will appear; Date of Distribution; and Final Approval Deadline.

The Company will review your proposed advertisement, recommend any state specific changes, and will assign an advertisement tracking number.

If you have any questions regarding these guidelines or any other questions, call our toll-free number: 800 767 7749.

F. GLOSSARY

General Guidelines

The following guidelines and definitions will be used in reviewing all advertising. Please review them prior to submitting advertising for approval. Please note that these guidelines and definitions are not meant to be all inclusive, and additional requirements may apply.

Accuracy and Truthfulness

Ads must be fair and balanced. No aspect of the ad can be considered untrue, misleading or deceptive and no material piece of information can be omitted. It cannot make exaggerated, unwarranted or misleading claims.

If the following terms are used, the party paying for the benefits must be disclosed and the terms must be true and verifiable: "free", "no cost", "without cost", "no additional cost", "at no extra cost", "vanishing" or similar words.

All comparisons, if allowed, of benefits, performance or rates of our products or competitor's products must be fair and complete. The ad cannot disparage other insurers, agents, products or selling methods.

Agency Name

Include your agency's name as it appears on your agent's license. For example, if an agent Name is licensed as "John Doe" but is doing business as "City Insurance Agency," "John Doe, Independent Agent" must appear on the ad. The agency/agent name that is advertised must have an active contract with Guggenheim Life.

Agent Name

All advertisements and promotional material must include the agent's name as well as a "Name" reference to "Independent Agent."

Agent Use Only

If an ad is intended for agent use only, the following disclosure must be included on the bottom of each page of the piece: "FOR AGENT USE ONLY. NOT TO BE USED FOR CONSUMER SOLICITATION PURPOSES." This disclaimer must be in a font size that has the equivalent readability of Arial 8 pt. in bold and all caps.

Approval Period

Due to the changing nature of regulations governing advertisements and sales materials, approval is valid for up to twelve (12) months. This time period may be shorter if interest rates or company-sponsored special promotions are referenced in the ad or a product is revised or discontinued. Upon expiration of the time period, you must resubmit the ad for approval if

you intend to continue to use the ad. If revisions are made to an approved ad during the 12 month period, the ad must be resubmitted with a different form number or revision date for review prior to use.

Blind Ads

Always indicate the licensed agent as the contact person. All consumer ads must have the name of the agent, agency (if applicable), address, email address and phone number.

The product being advertised must clearly be identified as an annuity or life insurance.

If referencing a generic entity, such as "one of the nation's leading brokerage clearing institutions" or "one of the largest privately owned companies", then the name of the group, institution or company must be identified.

Blind advertisements will not be approved.

Business Cards and Letterhead

Agent business cards and letterhead must include the agent's name followed by the term "Independent Agent" and, in states (Arkansas, California and Texas) that require the agent's state insurance license number be listed, "Independent Agent License # [insert state insurance license number]". The agent's address and phone number must appear on the card, as opposed to contact information for Guggenheim Life.

Company Name

The full name of the issuing company must be used in the first reference to the insurer. Thereafter, shortened versions of the company name can be used.

Acceptable forms of company names:

Guggenheim Life and Annuity Company

Guggenheim Life

Guggenheim Life and Annuity Insurance Company (California).

Designations

Professional designations must be reviewed and approved prior to use with the public. Designations that do not represent meaningful achievement or specialized knowledge that would be considered valuable to a consumer will not be approved. A listing of approved and prohibited designations can be located on our agent website.

FDIC/NCUA

If our products are being marketed through a financial institution or if the ad references savings accounts or certificates of deposit, the following disclosure must be included on the ad. This is required on consumer advertising for products sold through a banking institution, by an agent connected with a banking institution or when comparing a product to a certificate of deposit.

"Insurance products are not bank deposits and are not insured by the FDIC/NCUA or other regulatory agencies. They are not obligations of or guaranteed by a financial institution or other affiliated entities, and are not a condition of a loan.

NOT A DEPOSIT

NOT FDIC/NCUA INSURED

NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY

NOT GUARANTEED BY THE BANK

NOT A CONDITION OF A LOAN"

Final Copy

We must receive a final copy of all approved ads. If revisions to your ad are necessary, you are required to submit a final copy of the ad with the revisions before approval and before use.

Form Number

All ads must have a form number in the bottom left-hand corner of each page or in the disclaimer. If you do not include a form number on the ad when it is submitted for approval, a form number will be assigned and you will be notified to include it in your ad.

Interest Adjustment

For annuities, when referencing withdrawals, surrenders and/or Interest Adjustment, include the following disclosure: "An Interest Adjustment is applied only during the surrender charge (or Interest Adjustment) period to full surrenders and to the amount of any partial surrender in excess of the penalty-free amount. An Interest Adjustment may decrease or increase the Surrender Value depending on the change in interest rates since the annuity purchase date."

Interest Rate

If reference is made to specific interest rates, include the statement: "Interest is based on current rates and subject to change without notice."

If reference is made to first-year yield, combining a premium bonus with the fixed account, include the following statements: "XX.XX% First-Year Yield reflects a XX% Premium Bonus plus a X.XX% Fixed Account Rate, and assumes no withdrawals. This yield applies only to premiums in the Fixed Account. The Fixed Account Interest Rate is based on current rates and subject to change."

Liquidity

The description of liquidity or ease of fund access must be equally balanced by clear language describing the negative consequences of early redemption/withdrawals.

The ad cannot imply or represent that life insurance is a "short-term" or "liquid investment."

Terms such as "tax-free" cannot be used unless referring to a life insurance death benefit paid to a named beneficiary. Depending on the content, "generally tax-free" may be acceptable.

If a reference is made to any withdrawal feature of a product, include the disclosure: "Withdrawals prior to age 59 1/2 may be subject to IRS penalties. Withdrawals during the surrender charge period will be subject to surrender charges."

Mortgage Re-financing, Mortgage Acceleration, Reverse Mortgages, Home Equity Loans

Use of any advertising, sales literature or seminar materials that in any way employs mortgage re-financing, reverse mortgages or mortgage-acceleration strategies are prohibited. This prohibition is not limited to the point of sale or the sales process. No such advertising or sales materials may be used when promoting Guggenheim Life or our products or securing an appointment that may result in the sale of a Guggenheim Life product. In addition, sales material on a subject other than mortgage refinancing may not be used if the intention is to systematically promote mortgage re-financing to pay premiums at some later date. Inappropriate mortgage re-financing sales strategies include, but are not limited to:

Use of home equity loans to pay premiums;

Use of home equity loans to consolidate debt and lower monthly payment with the intention of using the increased cash flow to pay premiums;

Diverting funds intended for mortgage payments to pay premiums;

Re-financing mortgages to a lower interest with the intention of using the increased cash flow to pay premiums;

Reducing the intended amount of a mortgage down payment to pay premiums.

Encouraging or directing a client to take out a reverse mortgage or obtain home equity funds and use the money to buy a life insurance policy or annuity.

The traditional emphasis on the use of the death benefit protection or the potential cash value provided by life insurance to reduce or eliminate a mortgage balance when selling life insurance may be acceptable as long as the ad, in its entirety, is fair and balanced.

Opt Out of Email

If you are sending an approved email to a client, the client must be allowed to opt out of receiving further emails from you. Please add the following or similar language to any email sent to a client that is not a response to a question: "To stop receiving further email messages from me (or include your name), please reply back and ask to be removed."

Premiums

An ad for life insurance cannot contain a statement or representation that premiums paid for a life insurance policy can be withdrawn unless reference is made to a prepayment agreement or unconditional premium refund offer.

Premium charges must be prominently described if the policy has non-level premiums.

There can be no representation that a pure endowment benefit is a "profit" or "return" on the premium paid rather than a policy benefit for which a premium is paid.

Premium Bonus

If the premium bonus feature is discussed for products offering a premium bonus, the following disclosure would be used: "Products that have premium bonuses may offer lower credited interest rates, lower Index Cap Rates and lower Participation Rates than products that don't offer a premium bonus. Over time and under certain scenarios, the amount of the premium bonus may be offset by the lower interest rates, lower Index Cap Rates and lower Participation Rates."

Prior Approval

If an ad being submitted is based on a previously approved ad, please include the previously approved form/ad tracking number and a description of the changes in your submission. This can help expedite the review.

Product Comparisons

Comparisons, if allowed, must be clear and provide a fair and balanced presentation including material differences such as retirement objectives, sales and management fees, liquidity, safety, guarantees or insurance, fluctuation of premium and/or return, tax features.

Comparisons of life insurance to annuities, mutual funds or certificates of deposit (CD) are inappropriate since they are purchased for different reasons and fulfill different needs.

Comparison to "other taxable savings methods" rather than a specific product is more acceptable when featuring the benefits of tax deferral as compared to a taxable financial product.

Comparisons of fixed annuities to a CD may be inappropriate without specific disclosures and complete explanation. There can be no implication that fixed annuities are CDs or that they are similar in nature to a CD.

Product Disclosure

Any ad promoting one of our products must include a footnote describing the contract type, form number and issuing company. A typical product disclosure is as follows: "[Marketing Name] is issued on form series X\|MX, by Guggenheim Life and Annuity Company for an annuity contract, [City, State]. This product, its features, riders, endorsements and issue ages may not be available in all states. Limitations or restrictions may apply."

Product Features

Specific product or feature related disclosures may apply and will be provided by the advertising review analyst.

Product Type

The product being advertised must clearly be identified as an annuity contract or life insurance policy. The product type must be clearly and accurately identified. For example: Fixed Index Annuity or Index Universal Life Insurance.

Prohibited Terminology

The terms "safe money", "no cost", "disappearing" or "vanishing" may not be used in any advertising materials. The words "guarantee" and "safety" may be allowed to describe certain fixed product features with adequate disclosure. If a guarantee is referenced, the type of guarantee must be specified, i.e. premium guarantee, death benefit guarantee, etc.

A life policy cannot be billed as an "investment", "investment plans", "charter plans", "savings plan", "savings", "private pension plan", "financial planning", "retirement plan" or "retirement" vehicle.

Do not refer to premium payments as "deposits", "contributions", "investments", "investment plan" or "principal".

Absolute words such as "all", "never" and "shall" are not to be used. Key words and phrases to avoid include "expert", "specialist", "promise" or "no risk".

Advertising that implies or refers to Guggenheim Life's annuities as appropriate products for "Medicaid friendly" annuity programs will not be approved.

Promissory Language

Promises may be misconstrued as extra-contractual responsibilities or fiduciary duty and might increase the company and/or agent risk and liabilities. Promissory language, whether to consumers or agents, is not allowed.

Public Information

If public information, such as the name of a mortgage company and mortgage loan amount, is used in advertising, such advertising must include the following disclosure: "[Information] was obtained from public records. [Agent Name] is an independent insurance organization not affiliated with any bank, mortgage company or other lender."

Quotes

If a quote or similar material is used in the ad, indicate whether the material is copyrighted and if the agent has permission to reprint the article and/or quote.

Religion/Faith

Religious beliefs in the United States take many forms. Given the diversity of our agents and our contract/policy owners, we have taken the position that we will not approve the use of any reference to faith, religion or religious conviction in advertising, sales literature, seminars, contract/policy owner correspondence or any other material used to promote our company and/or induce the sale of our products.

Senior Market

Advertising that targets or focuses on the Senior Market is prohibited.

Social Media

The use of interactive social media to promote our Company, any of its products or to provide financial advice to consumers is prohibited. Examples of social media include Facebook, YouTube, Twitter, Myspace, on-line chat rooms and instant messaging. The use of blogs requires the text to remain static and the ability for interaction between agent and public to be deactivated. Text for blogs and LinkedIn profiles must be approved prior to posting.

State Licenses

If the advertisement will be distributed in the state of Arkansas, California or Texas, you are required to include your state-issued license number on the advertising in the same size font as your contact information. All consumer advertising pieces must list the state(s) where insurance licenses are held.

Statistics

Any use of statistics or references to third-party information must clearly identify the source of the information including the name and date of the report or publication. The date of the statistical information must be current within twelve (12) months of the date the ad is submitted.

Surrender Charges

For products that contain surrender charges and are referenced in the ad, include the following disclosure:

For Annuities - "Surrender charges vary by product, issue age, sex, underwriting class and policy year. Withdrawals, surrenders and interest adjustment, if applicable to the product, made during a Surrender Charge period will be subject to surrender charges and may reduce the ultimate death benefit, cash value or accumulation value. A surrender charge during the surrender charge period could result in a loss of premium."

Tax Deferral Feature

When comparing the tax deferral feature of our products to other qualified plans, the following disclosure must be included:

For client pieces used in the presentation at time of sale:

"The tax-deferred feature of the [policy] [annuity] is not necessary for a tax-qualified plan. In such instances, you should consider whether other features, such as the death benefit and optional riders make the [policy] [annuity] appropriate for your needs. Before purchasing this product, you should obtain competent tax advice both as to the tax treatment of the [policy] [annuity] and the suitability of the purchase."

Annuities - For other client and agent pieces:

"Under current law, annuities grow tax deferred. Annuities may be subject to taxation during the income or withdrawal phase. The tax-deferred feature is not necessary for a tax-qualified plan. Neither Guggenheim Life, nor any agents acting

on its behalf, should be viewed as providing legal, tax or investment advice. You should advise your client to consult with and rely on their own qualified advisor."

Client piece add: "Consult with and rely on your own qualified advisor."

For agent use only, add:

"You should advise your clients to consult with and rely on their own qualified advisers before making a purchasing decision."

Terms such as "tax-free" and "tax-free retirement" cannot be used.

Tax/Legal Advice

Neither Guggenheim Life, nor its agents give tax or legal advice. Depending on the extent and focus of the information provided, material discussing tax or legal issues may not be approved.

Testimonials

The opinions and ideas expressed by the individuals providing testimonials are their own. The testimonials are not indicative of future performance or success and may not be representative of the experience of other clients or agents.

Third Party Rating Disclosures

Reference to any third party/commercial rating must incorporate the full description of the rating, including a statement about the number of categories that a rating service would use to rank a company and where a particular ranking would fall within the total number of categories. The following are examples of approved disclosures:

A.M. Best Rating: A.M. Best is a large third-party independent reporting and rating company that rates an insurance company on the basis of the company's financial strength, operating performance, and ability to meet its obligations to contract holders. For the latest A.M. Best rating, access www.ambest.com.

S&P Rating: S&P is a large third-party independent reporting and rating company that rates an insurance company on the basis of the company's financial strength, operating performance, and ability to meet its obligations to contract holders.

Titles

Titles such as "financial planner", "investment advisor" and "financial consultant" may not be used to imply that an agent is involved in an advisory business in which compensation is fee-based. A person should not render investment advice for compensation or hold himself/herself out as a Financial Planner or Investment Advisor Representative, UNLESS he/she is registered with the Securities and Exchange Commission, a Registered Investment Advisor or as an advisory affiliate under an Investment Advisor as well as being registered in the appropriate state as an Investment Advisor Representative.

Trademarks/Service Mark

All applicable Trademarks or Service Marks must be indicated on any and all advertising. Advertisements that do not meet this requirement will be disapproved. Please contact Guggenheim Life's offices for more information.

Website Links

PLEASE NOTE: The information being provided is strictly as a courtesy. When you link to any of the web sites provided here, you are leaving this web site. We make no representation as to the completeness or accuracy of information

provided at these web sites. Nor is the company liable for any direct or indirect technical or system issues or any consequences arising out of your access to or your use of third-party technologies, web sites, information and programs made available through this web site. When you access one of these web sites, you are leaving our web site and assume total responsibility and risk for your use of the web sites you are linking to.

Withdrawal Feature

If a reference is made to any withdrawal feature of a product, include the disclosure: "Withdrawals prior to age 59 1/2 may be subject to IRS penalties. Withdrawals during the surrender charge period will be subject to surrender charges and Interest Adjustment (if applicable to the product being promoted)."

Internet Advertising Guidelines

Internet advertising includes home pages and all related pages in a website. To submit your site and/or page for approval, submit copies of all relevant web pages, including all links and instructions for accessing the site online in printed format. Note that approval must be received prior to any website "going live." Regulations that apply to print advertising also apply to internet advertising. Since a website is accessible to all consumers and agents regardless of where they live, internet advertising must comply with advertising requirements in all states.

Many websites, including those that market insurance products, may be identified by a marketing name that is different from the name shown on the "official" license for the agency or agent. Please note that a marketing name can easily be construed as a DBA (doing business as) and as such, could require that the name be filed with the respective secretary of state offices and/or state insurance departments.

Since information contained on a website can be viewed by virtually anyone, include where you are licensed to do business and that you are a domestic US agent/agency.

Please note that material that has been approved for Agent Use Only cannot be posted on a public website unless it is accessible only through a secure agent login.

When including product information that is for Agent Use Only, please provide the internet address, User ID and password.

Seminars

Seminar selling, free lunch or dinner offers and the use of lead-generating material are under increasing scrutiny of regulators. All such promotions must disclose that a licensed insurance agent is involved and that insurance products may be discussed or offered for sale, then or at a later time. You may not use materials that contain exaggerated or misleading claims, or that are intended to pressure the consumer into making an immediate decision. Any reference in any material that suggests the involvement of any regulatory or governmental agency, or any organization that focuses on seniors is prohibited.

Seminars are defined very broadly to include any public speaking appearance in which you are involved as either (1) a speaker at the event or (2) an organizer or facilitator of the event (including client appreciation events). Any event in which a presentation is given to more than one client or prospect is considered a seminar and all materials must be submitted for advertising review. Advertisements or mailers that invite consumers to attend a seminar must be submitted for advertising review and approval, along with the content, presentation materials (PowerPoint files, slides, overheads, etc.) and any other handouts that will be distributed to consumers **PRIOR TO OFFERING THESE SEMINARS TO THE PUBLIC.**