

**DISCLOSURE REGARDING USE OF A VOLATILITY MANAGEMENT STRATEGY IN CONNECTION WITH
OPTIONAL GUARANTEED BENEFIT ELECTIONS**

You are receiving this notice because your contract makes available to you one or more optional guaranteed benefits such as a guaranteed minimum income benefit, guaranteed withdrawal benefit, personal income benefit or guaranteed minimum death benefit (the "Optional Guaranteed Benefits"). If you have elected an Optional Guaranteed Benefit, and your contract makes available investment options that invest in Portfolios with or without a volatility management strategy, you should carefully evaluate with your financial advisor whether to invest in Portfolios with a volatility management strategy, taking into consideration the potential impact, discussed below, that this strategy may have on your Optional Guaranteed Benefits. The selection of any investment options that utilize this strategy in addition to the income and death benefit protection provided by Optional Guaranteed Benefits should be consistent with your investment objectives and may not be appropriate for everyone.

What is a volatility management strategy?

A volatility management strategy is used as a risk mitigation tool for certain subadvised Portfolios. The strategy seeks to reduce market risk exposure and overall volatility during periods of expected heightened market volatility. Portfolios generally seek to reduce equity exposure through the use of derivatives and investments in bonds or other fixed income securities, currencies, futures and options such as exchange-traded futures and options contracts on securities indices, and other financial instruments in response to equity market volatility. Certain Portfolios may utilize different volatility management techniques. Use of a volatility management strategy may result in periods of improved performance including in periods when the benchmark index is declining during which your account value may decline less than would have been the case without these defensive actions.

How does a volatility management strategy affect my Optional Guaranteed Benefit(s)?

You pay an additional fee for Optional Guaranteed Benefits. Election of Optional Guaranteed Benefits is another tool that you can use to reduce exposure to a declining market. Optional Guaranteed Benefits protect income payments from your contract and provide death benefit protection because the guaranteed minimum income payment amount or death benefit will not decline no matter how the market performs. Accordingly, investing in Portfolios with exposure to a volatility management strategy may, under certain market conditions, provide little or no additional benefit to you if you have elected an Optional Guaranteed Benefit.

The strategy may result in periods of underperformance, including those when the specified benchmark index is increasing resulting in your account value rising less than would have been the case without these defensive actions. If you elected an Optional Guaranteed Benefit this strategy may also suppress the benefit base and may therefore result in lower guaranteed minimum income or death benefits. Because the strategy could suppress increases in your account value this may also reduce the likelihood of benefiting from an increase due to a ratchet or reset, if eligible.

For certain contracts, electing an Optional Guaranteed Benefit limits your ability to invest in the variable investment options otherwise available to you under the contract. If you elect an Optional Guaranteed Benefit, you may be restricted to variable investment options that invest in Portfolios with exposure to a volatility strategy as described above.

The information set forth in this document is not a complete description of all material provisions of your variable annuity contract and the Optional Guaranteed Benefits. The prospectus contains more complete information, including investment objectives, risks, charges, expenses, limitations and restrictions. Please read the prospectus and any applicable supplements, and consider the information carefully before purchasing a contract and benefits. Additionally, for further details regarding the contract or the investment options, speak to your financial professional/insurance-licensed registered representative or call our 800 number.