



April 18, 2014
AD14-0418
For Financial Professional Use Only

Audience: Life Producers

Re: Anti-Money Laundering Training and Continuing Education Credit Hours Opportunity

What's New:

- This communication describes 2014 Anti-Money Laundering training and requirements for independent producers. Upon completion of the course, producers have an opportunity to purchase continuing education requirements.
- Refer to the attached [Producer's Guide to Anti-Money Laundering](#) and [Frequently Asked Questions](#) for additional information.

When:

Effective immediately

For More Info:

See the following page for details. If you have additional questions, contact AXA's Licensing Department at 866-262-6669, Option 3, followed by Option 2, or via e-mail at LifELicensing@axa.us.com.

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IU-67609 (4/14)

AXA Distributors, LLC, New York, NY 10104.

AXA Equitable Life Insurance Company is the parent company of AXA Distributors, LLC.

For all sales in 2014, each producer is required to receive Anti-Money Laundering (AML) training prior to acceptance of an application, to comply with federal AML regulations for insurance companies. AXA has again selected the LIMRA AML training as its third-party training source for independent producers. Producers who completed their initial AML training prior to January 1, 2014, are required to re-certify their training by completing the AML Refresher course, titled Ramifications of Money Laundering – Anti-Money Laundering for Insurance Review. Training updates must be completed prior to acceptance of an application submitted on or after **September 1, 2014**.

Producers may complete the training by going to the LIMRA website at <https://aml.limra.com>.

The producer's username is the first four characters of his or her last name, followed by the last six numbers of his or her Social Security Number. For producers using the LIMRA website for the first time, the password is their last name, all in lowercase letters. For producers returning to the LIMRA website, their password remains what was created during the first login. Online help and password reset are available on the website. AXA will be among the companies listed in the Company Pages section of the Home Page. Please note that you **will not** receive a paper certificate of your completion of the course. All companies that have subscribed to the LIMRA course will be given information on producers who have successfully taken the course based on producer information provided by the companies.

Producers who do not use the third-party vendor selected by AXA must certify (or re-certify) to AXA the successful completion of AML training. Either a copy of the course certificate and outline or a name, address and phone number for a company AML contact are required, and should be e-mailed to LifeLicensing@axa.us.com or faxed to (800) 657-2911.

Producers who maintain a registered representative status through FINRA are not required to take the LIMRA AML training, but must be validated as having a current active CRD number.

LIMRA'S AML course has been approved for continuing education credits in most states. For an additional fee, producers have the option to obtain credit hours for completing the training course and exam.

Producer's Guide to Anti-Money Laundering

As an insurance producer, your skills and services help your clients achieve financial success and security. Because you are on the front lines of a multi-billion dollar industry, you are in a unique position not only to serve your clients, but also to serve the country by helping prevent money laundering and the financing of terrorist activities. To comply with the federal anti-money laundering regulations for insurance companies, AXA has adopted a detailed anti-money laundering program. You have an important role to play in that program. As a person who deals directly with customers, you will often be in a critical position to obtain information on the customer, source of funds for the products you sell, and the customer's reasons for purchasing an insurance product. In order to sell AXA insurance products, the Company's anti-money laundering program requires you to ensure that all information requested on the product application, associated documents, and source of funds is accurate and complete.

Customers who resist providing information: If a customer resists providing information, notify your General Agent immediately. Records of this information must be retained as long as the contract remains in force and for five years thereafter. Notify Patti Johnson at AXA of any customer resistance to providing information or if you detect any money laundering red flags, so that the Company can determine whether the activity is suspicious, such as:

- The purchase of a product that appears inconsistent with a customer's needs
- The purchase or funding of a product that appears to exceed a customer's known income or liquid net worth
- Payment of a large amount broken into small amounts
- Little or no concern by a customer for the performance of an insurance product, but much concern about the

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- early termination features of the product
- The reluctance by a customer to provide identifying information, or provision of information that seems fictitious
- Any other activity that you this is suspicious

If a customer provides a form of payment that is not permitted, it should be returned immediately. Forms of payment that are acceptable include:

- Traveler's checks
- Cash or currency
- Third-party checks
- Any check drawn on a foreign bank or a correspondent bank. All checks must be in U.S. dollars and drawn on a U.S. bank governed by U.S. banking regulators
- Checks written by the Producer or General Agent
- Negotiable instruments not filled in completely

As a producer, you are required to complete periodic anti-money laundering training. AXA has selected the LIMRA training as its third party training source. Please go to the LIMRA website, <https://aml.limra.com>, and follow the instructions to take the AML training. Complete the course titled *Ramifications of Money Laundering – Anti-Money Laundering for Insurance Review*. There are two versions of the course available—one with Flash enabled and one without. **You are only required to complete one of these versions.**

Your username will be the first four characters of your last name, followed by the last six digits of your social security number. If this is your first time accessing the LIMRA website, your password is your last name, all in lowercase letters. If you are returning to the LIMRA website, the password remains what was created during your first login. AXA Equitable will be among the companies listed in the Company Pages section of the Home Page.

Please note that you **will not** receive a paper certificate of your completion of the course. All companies that have subscribed to the LIMRA course will be given information on producers who have successfully taken the course based on producer information provided by the companies. Should you have technical questions accessing or navigating within the LIMRA site, please contact LIMRA's technical support partner's help desk at support@cfmpartners.com or (866) 364-2380.

If you do not use the third-party vendor selected by AXA, you must certify to AXA the successful completion of AML training and identify the provider. Proof of completion of AML training is required, and either a copy of the course outline or a name, address and phone number for a company AML contact are required.

AXA and producers share an important responsibility to comply with the Company's program and all applicable anti-money laundering laws. Failure to do so will constitute grounds for termination of your appointment with AXA. In addition, violation of anti-money laundering laws may expose those responsible to substantial penalties under federal law.

If you have any questions, please contact Patti Johnson, 704-341-6507.

Please review [Frequently Asked Questions](#) regarding the LIMRA AML training for further details.

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