OXFORD® LIFE INSURANCE COMPANY
2721 North Central Avenue
Phoenix, Arizona 85004-1172
investorsclub@oxfordlife.com

Roth Individual Retirement Account Disclosure Statement

(Pursuant to Treasury Regulation § 1.408-6)

Right to Revoke Your Roth IRA

As required by federal law, you have the right to revoke your Roth IRA by delivering a written notice of revocation to the Custodian within seven (7) days after establishing the Roth IRA. If you exercise the right to revoke your Roth IRA, you are entitled to a return of the entire amount you deposited into the Roth IRA without adjustment by the Custodian for such items as sales commissions, administrative expenses or fluctuations in market value. Because of this revocation right, deposited funds will not be available for investment until after expiration of the seven-day revocation period.

Any revocation notice must be in writing. If you send a revocation notice by mail, it shall be deemed mailed on the date of the postmark (or if sent by certified or registered mail, the date of certification or registration) if it is deposited in the mail in the United States, properly addressed, with first class postage prepaid. The name, address and telephone number of the person to receive any revocation notice are:

Oxford Life Insurance Company
U-Haul Investors Club IRA
2721 North Central Avenue
Phoenix, Arizona 85004
(800) 308-2318

General Legal Requirements for Roth IRAs

Roth IRAs must comply with the following general legal requirements.

- Except for rollover or transfer contributions (if the custodian will accept a non-cash rollover or transfer), only cash contributions are permitted.
- Contributions for each year cannot exceed the contribution limits applicable to you for that year.
- The Roth IRA custodian must be a bank, savings and loan association, credit union, or a person approved by the IRS to serve as a Roth IRA custodian. The IRS has approved Oxford Life Insurance Company to serve as a Roth IRA custodian.
- You cannot invest any Roth IRA funds in life insurance contracts or collectibles (as defined in Section 408(m)).
- Your interest in the Roth IRA is non-forfeitable at all times.
- Roth IRA assets may not be commingled with any other property, except in a common trust fund or a common investment fund.
- Any portion of the IRA not distributed prior to your death must be distributed to your beneficiary(ies) within 5 years after the end of the year in which you die. Distributions may be spread out over the beneficiary's life expectancy if paid as an annuity and

distributions begin by the end of the calendar year following the year of the owner's death.

- A surviving spouse beneficiary can elect to become the Roth IRA owner or delay the distributions until the owner would have reached age 70½.

Eligible Roth IRA Participants

You are eligible to open and contribute to a Roth IRA if you (or your spouse for married couples filing joint returns) earned compensation during the year. "Compensation" means taxable income earned from working. It includes wages, salaries, tips, professional fees, commissions, self-employment income, and any taxable alimony or spousal maintenance payments received under a divorce decree or separation agreement. For members of the United States military, compensation also includes nontaxable combat pay.

Income from investments, pensions, Social Security and other sources of passive income do not qualify as compensation for purposes of determining Roth IRA eligibility. Except for combat pay, amounts excluded from your taxable income are not compensation.

Federal Income Tax Consequences of Establishing a Roth IRA

You cannot deduct any of the contributions you make to your Roth IRA from your federal taxable income. Contributions can accrue earnings and gains on a tax-free basis because qualified distributions from a Roth IRA are not included in your federal taxable income (see *Taxes on Distributions* below). Assets can be moved from a Roth IRA to another Roth IRA or a Designated Roth Account without incurring federal income tax (see *Rollovers and Conversions* below).

Roth IRA Contributions

Your compensation for the year determines if and how much you can contribute to your Roth IRA. Unlike a traditional IRA, you can contribute to a Roth IRA after you reach age 70½.

<u>When Can You Contribute?</u>

The IRS will treat your contribution as received by the Roth IRA during the taxable year if you pay the contribution by the due date for filing your federal income tax return for that year (not including extensions). This means contributions for 2011 must be made by April 17, 2012.

<u>General Contribution Limits</u>

The maximum Roth IRA contribution is equal to the lower of your compensation for the year and an amount specified by the IRS. For 2011, the Roth IRA contribution limit is $5,000 ($6,000 for individuals age 50 and older). The limit applies to the total amount you can pay to all IRAs if you have more than one IRA (Roth or traditional).

<u>Effect of Modified AGI on Roth IRA Contribution Limit</u>

Married taxpayers who file joint returns use their combined compensation for the year to determine the amount each may contribute to a Roth IRA, even if one spouse has no compensation for that year. The spouse with the higher income uses the general contribution limit. The spouse with the lower taxable compensation can make IRA contributions not to exceed the lesser of: (1) $5,000 ($6,000 if age 50 or older), and (2) the couple's total compensation for the year, reduced by the other spouse's contributions to traditional IRAs and any Roth IRA for that year. This means a spouse with no income may qualify to contribute to an IRA based on the couple's total compensation.

Example. Dick and Jane are married and file joint tax returns. Both of them are younger than age 50. For 2011, Jane earned $40,000. Dick was a full-time student and had no income for the year. Jane contributed $5,000 to her Roth IRA. Dick can also contribute $5,000 to his Roth IRA because $5,000 is less than Jane's income reduced by her Roth IRA contribution ($40,000 - $5,000 = $35,000).

Your maximum Roth IRA contribution starts to phase out when you earn more than a certain amount of modified adjusted gross income ("Modified AGI").

Effect of Modified AGI on 2011 Roth IRA contribution limit:

Filing Status	**Effect of Modified AGI on Deduction**
Single* or head of household	Contribution limit starts to phase out for Modified AGI above $107,000 and no contribution is allowed if Modified AGI is $122,000 or higher.
Married filing jointly or qualifying widow(er)	Contribution limit starts to phase out for Modified AGI above $169,000 and no contribution is allowed if Modified AGI is $179,000 or higher.
Married filing separately and you lived with your spouse at any time during the year	No contribution is allowed if Modified AGI is $10,000 or higher.

*The IRS does not consider married individuals filing separately and living apart for the entire tax year married for purposes of applying Roth IRA contribution limits.

Excess Contributions

Excess contributions means any amount paid to your Roth IRA above your contribution limit for the year. Generally, you must pay a 6% tax on any excess contributions to your Roth IRA. The 6% tax is payable each year on any remaining excess contributions until withdrawn or applied to a subsequent year's contribution limit.

Withdrawing Excess Contributions

The 6% tax will not apply if you withdraw the excess contribution and any interest or other income earned on the excess contribution from the account by the date your tax return is due for the year (including extensions). You will have to include any earnings allocable to the excess contribution in your taxable income for the year in which you made the excess contribution.

Applying Excess Contributions to a Subsequent Year

Instead of withdrawing an excess contribution, you can treat it as a contribution made during a later year. You may only apply excess contributions in a subsequent year when your deductible limit exceeds the actual contributions made that year. For example, a person with a $5,000 Roth IRA contribution limit in 2011 who makes actual 2011 contributions of $2,000 could treat up to $3,000 of excess contributions from prior years as contributions made in 2011. However, you still must pay the 6% additional tax on the excess contributions each year until the year in which you apply the excess.

Trustee-to-Trustee Transfer

You can transfer assets from your Roth IRA directly to another Roth IRA tax-free. A trustee-to-trustee transfer does not count as a rollover because the funds are never distributed to you. As a result, it is not subject to the one-year waiting period for rollovers.

Rollovers and Conversions

The term rollover refers to withdrawing assets from a retirement plan and contributing them to another retirement plan. A distribution from your Roth IRA is not taxable if you contribute the entire amount distributed to another Roth IRA within 60 days after you receive the distribution.

Rollover Waiting Period

Generally, you must wait one year before you can make another tax-free rollover from an IRA.

Rollover Contributions to Your Roth IRA

You can only use assets from another Roth IRA or a Designated Roth Account to make a tax-free rollover contribution to your Roth IRA.

Rollover Distributions from Your Roth IRA

You can only rollover Roth IRA funds to another Roth IRA.

Roth IRA Conversions

You can transfer assets from a traditional IRA or an employer's eligible retirement plan to a Roth IRA. You will have to pay income taxes on assets transferred to a Roth IRA. The 10% additional tax on early withdrawals will not apply to a trustee-to-trustee transfer or a distribution contributed to a Roth IRA within 60 days.

Roth IRA Transfers Pursuant to Divorce

A transfer of an interest in a Roth IRA from one spouse to another by court order as part of a divorce is tax-free. This can be done by either changing the name on the Roth IRA or making a direct transfer of Roth IRA assets to another Roth IRA.

Exxon Valdez Settlement Income

Qualified taxpayers can contribute qualified settlement income from the Exxon Valdez litigation (*In re Exxon Valdez*, No. 89-095-CV (HRH)(Consolidated)(D. Alaska)) to a Roth IRA. Qualified settlement income contributions to a Roth IRA are included in your taxable income for the year in which you received the funds. See IRS Publications 590 and 525 for more information.

Kansas Disaster Area and Midwestern Disaster Areas Tax Relief

Special rules apply for qualified IRA distributions taken by individuals affected by storms, tornadoes or flooding in Kansas and other Midwestern areas on certain dates. Qualified Recovery Assistance Distributions and Qualified Disaster Recovery Assistance Distributions repaid within three years of the distribution date can be treated as qualified rollovers and excluded from income. However, such repayments are not considered a qualified rollover for purposes of the general limitation of one IRA rollover per year. See IRS Publications 4492-A and 4492-B for more information.

Recharacterizations

The term recharacterization means to treat a contribution made to one type of IRA as having been made to a different type of IRA. For example, an individual who makes a contribution to a traditional IRA can transfer the contribution to a Roth IRA and treat it as if the IRA owner originally made the contribution to the Roth IRA. The IRA owner must complete a trustee-to-trustee transfer (i.e., directly between the two IRA accounts) no later than the individual's tax return filing due date (including extensions) to recharacterize a contribution. The transfer must include all income allocable to the recharacterized contribution.

You can recharacterize a contribution by transferring the contribution to a different type of IRA with the same custodian. However, Oxford Life Insurance Company does not currently offer the ability to recharacterize a contribution to another IRA with Oxford Life Insurance Company.

No Lifetime Required Minimum Distributions

Traditional IRA required minimum distribution rules do not apply to Roth IRAs. You can leave funds in your Roth IRA for as long as you live. Minimum distribution requirements do apply to the designated beneficiary if the Roth IRA owner dies. (See *General Legal Requirements for Roth IRAs* above).

Taxes on Distributions

Withdrawals of contributions to a Roth IRA are not included in your federal taxable income. Qualified Roth IRA distributions of contributions and earnings are not taxable. "Qualified distribution" means the Roth IRA account satisfies the 5-year holding period and the distribution is made:

1. after the owner reaches age 59½;
2. after the owner becomes disabled;
3. to the designated beneficiary after the owner's death; or

4. for the purchase of a primary residence by a first-time homebuyer (subject to a $10,000 lifetime limit).

To satisfy the 5-year holding period requirement, the distribution must occur at least 5 years after the beginning of the firs taxable year in which the owner contributes to the Roth IRA.

Generally, an additional 10% tax applies to Roth IRA withdrawals of earnings on regular contributions and the entire amount of any assets contributed in a Roth IRA conversion before the end of the 5-year holding period. The 10% early withdrawal tax also applies to any Roth IRA conversion contributions withdrawn less than 5 years after the conversion.

The additional 10% tax does not apply to a qualified rollover contribution or certain distributions made under the following exceptions: (a) medical expenses that exceed 7.5% of your adjusted gross income; (b) health insurance premiums for the unemployed; (c) distributions after the death or disability of the IRA owner; (d) substantially equal annual distributions; (e) qualified higher education expenses; (f) first home acquisition costs; (g) payments in satisfaction of an IRS levy on the IRA; or (h) qualified reservist distributions.

Ten-year tax averaging and capital gains tax treatment options under Sections 402(a)(2) and (e) do not apply to IRAs.

Gift and Estate Taxes

The value of your Roth IRA will be included in the value of your estate for federal estate tax purposes. You may owe federal gift taxes on any transfer of Roth IRA assets during your lifetime.

Reporting Additional Taxes

You must file IRS Form 5329 for any year in which you owe additional taxes as a result of your Roth IRA. Additional Roth IRA taxes apply to early distributions (including deemed distributions as a result of prohibited transactions or using Roth IRA assets as security for a loan), excess contributions, and failing to take required minimum distributions.

Prohibited Transactions

If you or your beneficiary engage in a prohibited transaction (as defined in Internal Revenue Code Section 4975(c)), your Roth IRA will lose its tax-exempt status. All of the Roth IRA assets will be treated as if they were distributed to you in the year when the prohibited transaction occurs.

Any portion of the Roth IRA you use as security for a loan will be treated as a distribution, and taxable portions will be included in your taxable gross income for the year.

Prohibited transactions or using Roth IRA assets as security for a loan may also result in an additional 10% tax for early distributions if you are under age 59½.

IRS Form Approval

The Oxford Life Insurance Company Roth IRA Custodial Account Agreement uses the language of Form 5305-RA provided by the IRS (including additional language permitted by the form). As a result, the IRA has been approved as to form by the IRS. IRS approval only approves the form of the IRA custodial account agreement. It does not represent a determination by the IRS of the merits of the IRA.

Financial Disclosures

Growth Not Guaranteed or Projected

Oxford Life Insurance Company does not guarantee or project the growth in value of your Roth IRA. The growth in (or loss of) value of your Roth IRA depends on the amount and timing of your Roth IRA contributions and withdrawals, and the actual performance of investments chosen by you.

Custodian's Fees

Oxford Life Insurance Company shall be entitled to fees for services provided with respect to your Roth IRA, in accordance with its current Custodial Fee Schedule. U-Haul International, Inc. ("U-Haul") has agreed to pay Oxford Life Insurance Company's fees for serving as custodian of Investors Club IRAs. You may become responsible for payment of Oxford Life Insurance Company's fees if U-Haul ever discontinues paying the fees or upon the closing of the Investors Club account established for your Roth IRA.

Where to Obtain Additional Information

You may obtain additional information from any district office of the Internal Revenue Service. The IRS also provides information about Roth IRAs in Publication 590, *Individual Retirement Arrangements* (IRAs), which is available at www.irs.gov/publications.