

Adrian M. Fenty
Mayor

Thomas E. Hampton
Commissioner



Market Conduct Examination



Government of the District of Columbia
Department of Insurance, Securities, and Banking

(NAIC ACCREDITED)

Government of the District of Columbia
Department of Insurance, Securities and Banking



Thomas E. Hampton
Commissioner

January 15, 2008

I, Thomas E. Hampton, Commissioner of Insurance, Securities and Banking of the District of Columbia, hereby certify that I have compared the annexed copy of the

MARKET CONDUCT EXAMINATION REPORT

of

WILLIAM J. BAIRD, JR.

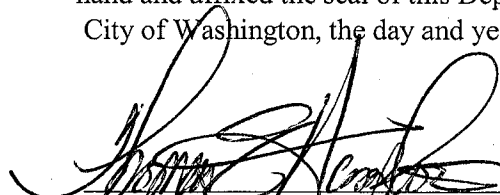
On behalf of

WILLIS OF MARYLAND

January 1, 2001 through December 31, 2003

With the original on file in this Department and the same is a correct transcript there from, and of the whole of said original.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of this Department, at the City of Washington, the day and year first written



Thomas E. Hampton
Commissioner of Insurance, Securities and Banking

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January 15, 2008

Honorable Thomas Hampton
Commissioner, District of Columbia
Department of Insurance and Securities Regulation
810 First Street, NE, Suite 701
Washington, DC 20002

Commissioner:

Under the provisions of the District of Columbia Official Code, Title 31, Section 1401 et seq., a comprehensive market conduct examination was made of the management and affairs of

WILLIAM J. BAIRD, JR.

On behalf of

WILLIS OF MARYLAND

from one of its administrative offices located at 10 North Park Drive, Hunt Valley, Maryland.

The report thereon, as of December 31, 2003 is herein respectfully submitted.

FORWARD

This examination is a systematic investigation of documents, procedures, and systems conducted in accordance with the guidelines and procedures recommended by the National Association of Insurance Commissioners (NAIC). The examination report generally notes only those areas or items which the Department of Insurance Securities and Banking (DISB) takes exception. The examination reflects the District of Columbia insurance activities of Willis of Maryland's use of William J. Baird's broker license, hereinafter referred to as the Broker. In the District of Columbia, a brokerage firm, such as Willis of Maryland, cannot obtain a surplus line broker license. The brokerage firm uses the broker license of its designated employee, William Baird. Any report reference to the brokerage firm is synonymous to the named licensee.

Violation(s) found in this report identifies the broker's activity that does not comply with an insurance statute or regulation. Brokerage policies, practices, and procedures are commented on for the purposes of giving the reader precision in clarity. The examination report may include management recommendations addressing areas of concern noted by DISB for which no statutory violation exists. In reviewing material for this report, the examiners relied primarily on records and materials furnished by the broker in reconciliation with records on file with the DISB.

This is the broker's initial market conduct examination.

SCOPE OF EXAMINATION

The on-site phase of this Comprehensive Surplus Lines Broker Examination of Willis of Maryland, Inc. was performed at its Maryland office location, which is situated at 10 North Park Drive, Hunt Valley, MD. The examination covered the period from January 1, 2001 through December 31, 2003.

Aside from essential background information, the commentary contained in this report is confined to those areas involving violation of laws, regulations, or rules. Additionally, significant departures from the Broker's policies, procedures, and standards are discussed.

Some unacceptable or non-complying practices may not have been discovered in the course of this examination. Failure to identify or criticize specific practices does not constitute acceptance of such practices by DISB. This report should not be construed to endorse or discredit the Broker or the insurance products administered.

METHODOLOGY

The examination process consists of a sequence of activities. Obtaining and confirming an understanding of the broker's operational system is vital in the examination process. Such activities are:

- Evaluating brokerage procedural manuals and memorandum;
- Conducting interviews with brokerage personnel; and
- Scanning transactions prior to sample selection

After obtaining operational knowledge, an evaluation or risk assessment is performed of the broker's unique characteristics, identifying and summarizing the major risks that will drive the individual exam area strategies.

Although the sequence of activities outlined occurs in every DISB market conduct examination and is based on NAIC Handbook standards and tests, some standards are measured using an analysis of general data gathered by the examiner, or provided by the broker in response to queries. Some standard findings are developed through direct reviews of random sampling of files.

The examiner's judgment determines the specific procedures, plans and tests appropriate for each brokerage operation. The standards were measured using tests designed to adequately measure how the broker met the standard. Each standard applicable to a broker's

functional operation is reported under its respective heading. A failed standard that also has a specific DC Official Code citation is identified under the related broker function. Unresolved examination violations/issues are at the end of the report under the caption, "Summary of Significant Issues". Areas of review having a direct statutory requirement but not a direct NAIC standard are accompanied at the end of the report under a separate report heading.

This market conduct examination was focused upon the following major areas:

- Operations and Management
- Placement Activities
- Areas having a direct statutory requirement, but not a direct NAIC standard.

BROKER PROFILE

Willis, Faber, and Dumas, one of the earliest Lloyd's brokerage firms, was founded in London in the early 1800's, while the New York firm of R.A. Corroon & Co. was established in 1904. The latter company was succeeded by Corroon and Black in 1966; and, following the 1990 merger of this entity with Willis, Faber, and Dumas, the present Willis Group Holdings, Inc. was formed.

In 1998, Willis became a private company following a major investment by the investment firm of Kohlberg, Kravis, Roberts & Co. (KKR). However, through an IPO issued in June 2001, Willis again became a publicly-held company, with ownership shared by KKR, a consortium of insurers, Willis employees/management, and the public.

Willis Group is one of only three global insurance brokers, providing professional insurance, reinsurance, risk management, financial, human resources consulting, and actuarial services to private business and public entities/institutions in 180 countries. In 2002, Willis Group revenues were \$1.7 billion on total premium volume of \$17 billion. Staffing is currently at the level of 13,000 professionals, operating out of 300 offices.

In its approach to the marketplace, what distinguishes Willis from its competitors is a strong emphasis upon client advocacy. Willis avoids the perception that it functions merely as a supplier of insurance services, instead striving to achieve strategic partnerships with client risk management. Thus, the need to understand the business needs and goals of clients is regarded as crucial to the success of Willis Group.

As an operating unit of Willis Group Holdings, Inc., Willis of Maryland employs a staff of professional-level brokers, risk management and benefits consultants in its Hunt Valley and Bethesda offices. This staff is dedicated to large risk management and middle market commercial and institutional clients headquartered principally in Maryland, Washington DC, Virginia, West Virginia, and Delaware.

The management organization, structure, and chain of command of the combined Willis of Maryland operations, including both the Hunt Valley and Bethesda offices, were under the direction of William J. Baird, Jr. Total staffing was approximately 100 professional-level brokers, risk management and benefits consultants during the period of this examination.

During the entire 3-year period of this examination, growth, as measured by written premium, trended positively, as shown in the following table:

	2001	2002	2003
Total Written Premium	\$317,684,387	\$393,160,291	\$333,090,611
Total Surplus Lines Premium	13,867,800	15,202,500	29,916,412
Surplus Lines: VA	3,387,932	2,763,394	13,396,070
Surplus Lines: PA	0	0	2,999,087
Surplus Lines: MD	7,789,082	5,946,995	8,746,608
Surplus Lines: DC	2,690,786	6,492,111	4,774,645

The surplus lines component of total written premium increased dramatically during 2003, it was noted that this increase is associated with jurisdictions other than the District of Columbia – and primarily Virginia.

OPERATIONS AND MANAGEMENT

In order to evaluate the Broker's operations and management, the examiner gathered data using informational requests, direct questioning, interviews, and presentations by the Broker staff and officers.

During the course of this examination, the Broker's operations were reviewed using tests prescribed in the NAIC Examiners Handbook, Volume I, Chapter X to determine if the Broker was meeting established industry standards. The examiners verified that the Brokerage does not collect nonpublic personal information in connection with respect to their commercial business transactions. NAIC standards for "Broker Operations/Management", specifically B-14, B-15, B-16, B-17 and B-18 are not applicable in this examination and are excluded from comments and findings. The following report section gives direct reference to the NAIC handbook standards applicable for review.

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-1

The broker has procedures in place to report, as required by statutes, rules, and regulations, fraudulent activities to the appropriate authorities.

Comments: The review methodology for this standard does not have a direct statutory requirement. DC Official Code §§ 22-3225.09 and 22-3225.12 deal with anti-fraud but does not apply to a surplus lines broker.

Finding: The Broker is in compliance with the standard.

Observations: Willis's has general policy statements on fraud and whistle blowing. These policies require when instances are reported to the Metropolitan Police Department or the Department of Insurance, Securities, and Banking.

Recommendations: None

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-2

The broker has a valid disaster recovery plan

Comments: A review the broker's disaster recovery plan was determined sufficient to meet this NAIC standard. A valid disaster recovery plan is consistent with the public interest and needs to be tested for effectiveness.

Findings: The Broker is in compliance with the standard.

Observations: The Broker provided a well planned, implemented and tested disaster recovery plan.

Recommendations: None.

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-3

Records are adequate, accessible, consistent, orderly and comply with state record retention requirements

Comments: In connection with their verification and evaluation of surplus lines affidavit entries, the examiners reviewed numerous policy and marketing files. The examiners found the Broker compliant with the provisions of DC Official Code § 31-2231.10.

Findings: The Broker is in compliance with the standard.

Observations: The Brokerage provided policies applicable to record retention but none for the destruction of insurance records.

Recommendations: None

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-4

The broker is appropriately licensed.

Comments: The review methodology for this standard has a direct statutory requirement. DC Official Code § 31-2502.40(a) that states in part any agent or broker licensed in the District may be licensed to procure policies from companies that are not authorized to do business in the District.

Findings: The Broker, William J. Baird, Jr., is in compliance with the standard.

Observations: None

Recommendations: None

All statutorily required bonds are in-force

Comments: The DC administrative citation requiring a statutory bond was repealed in April 1997. The DISB failed to inform producers or bond providers of the change in bonding requirements. The Broker provided the examiners with copies of bonds issued biennially covering acts of the licensee, William J. Baird, for the examination period. Each of the bond forms indicates a penal sum of \$20,000.

Finding: Broker procured bonds for the period under examination based on DISB provided renewal license forms.

Observations: Examiners selected to perform this NAIC standard based on information available during the planning phase of this examination. During the execution phase of the examination, the examiners learned of the statutory repeal. Broker was advised of the change in the DC bond requirement during the course of this examination.

Recommendations: None.

All required reports have been filed with the Department of Insurance or the appropriate authority.

Comments: The review methodology for this standard has a direct statutory requirement. DC Official Code § 31-2502.40(a) that states in part that each broker so licensed for unauthorized policy procurement shall execute and file with DISB on or before the 10th day of each month an affidavit covering the policy transactions of the previous month. For the purposes of testing timeliness and accuracy of reporting, as well as other attributes discussed in this report, the Broker provided copies of filed affidavits reflecting all surplus lines transacted during the examination period. The Broker provided the appropriate policy and companion marketing files thus enabling detailed review of each sampled transaction.

Findings: The Broker is not in compliance with the standard.

Observations: The statutory requirement of the Brokerage to file timely and accurate affidavits with the DISB was analyzed and evaluated within the context of a detailed review of policy and marketing files supporting the monthly affidavit entries. Based on their review of sample policy files, the examiners concluded that twenty-two (22) surplus lines policy renewal or endorsement transactions were not reported on monthly affidavits by the 10th of the month following the effective dates of these transactions, indicating noncompliance with DC Official Code § 31-2502.40(a). The following transactions were eventually report on filed affidavits, just not reported in the proper filing period:

Client (Exam Code)	Binder/Policy No.	Sample No.
X	4595155	1
W	7476153	7
V	GU0689262	9
B	NPG0106938	11
B	NPG0106938	12
U	GHYA069	15
T	ZK0000162	16
S	ZXB004154	20
R	UMO1605896	22
O	348-87-56	23
O	2798639	24
P	42ULP1266800	26
N	90006367	28
C	GHYC041	29
C	GHBX156	30
Q	153959	33
H	2795280	35
D	11539952	38
G	8168-4028	41
E	MG 4404000	42
G	MD44040	43
F	D2306A1A01	45

Recommendations: The Broker should monitor compliance for all tax filing deadlines.

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-7

The applicable taxes are reported and are credited to the state

Comments: The review methodology for this standard has a direct statutory requirement. DC Official Code § 31-2502.40(a) states, in part, that each broker shall pay to the Collector of Taxes, Through the Commissioner, on February 1st and August 1st of each year, a sum equal to 2 per centum of the amount of the gross premiums upon all kinds of policies procured by him during the immediately preceding 6 months' period ending December 31st and June 30th, respectively.

Findings: DC Official Code § 31-2502.40(a) requires semi-annual payments on the 1st day of February and August. Examination of the Brokerage's surplus lines tax returns revealed five (5) late payments – on 2/16/04, 8/7/03, 3/7/03, 8/19/02, and 8/2/01.

Observations: The examiners compared gross premiums reflected in data provided by the carriers with Brokerage-generated invoices and quotations against the filed tax affidavits. With the exception some clerical oversights, no significant discrepancies were found. Minor inaccuracies were found in the following affidavit:

Policy Number	MHC101600	Sample Number	4
Gross premium was entered incorrectly in the <u>Amount of Insurance</u> field of the tax affidavit. The error was detected by DISB and a corrected entry was filed. No tax payment error resulted			
Policy Number	MHC100600	Sample Number	5
Gross premium was reported incorrectly as \$115,874. The correct premium is \$115,847. No tax payment error resulted, and both premium and tax amounts reflected on the invoice are correct.			
Policy Number	US 4469	Sample Number	8
The amount of insurance was reported on the affidavit as \$1 Million, but the actual limit is \$41,555,000 (X of \$5 Million). The correct gross premium amount was entered.			
Policy Number	NPG0106938	Sample Number	11
The affidavit identifies the insurer as Reliance, which is the prior carrier. The carrier for this transaction should have been identified as Nutmeg			
Policy Number	NPG0110202	Sample Number	14
In the <u>Description of Risk</u> field of the tax affidavit, "Union Association" is recorded; this entry is inconsistent with all corresponding affidavit entries which reference type of coverage – Professional Liability in this case.			
Policy Number	003488535	Sample Number	17
The carrier is entered incorrectly on the affidavit as American International Specialty Lines; the correct carrier identity is National Union Fire.			
Policy Number	003488532	Sample Number	18
The carrier is entered incorrectly on the affidavit as American International Specialty Lines; the correct carrier identity is National Union Fire.			
Policy Number	ZK0000158	Sample Number	46
The carrier is identified incorrectly on the affidavit as Pacific Insurance Company; the correct carrier identity is Nutmeg.			
Policy Number	ZK0000160	Sample Number	47
The carrier is identified incorrectly on the affidavit as Pacific Insurance Company; the correct carrier identity is Nutmeg.			
Policy Number	ZK0000159	Sample Number	48
The carrier is identified incorrectly on the affidavit as Pacific Insurance Company; the correct carrier identity is Nutmeg.			
Policy Number	ZK0000162	Sample Number	49
The carrier is identified incorrectly on the affidavit as Pacific Insurance Company; the correct carrier identity is Nutmeg.			
Policy Number	ZK0000161	Sample Number	50
The carrier is identified incorrectly on the affidavit as Pacific Insurance Company; the correct carrier identity is Nutmeg.			

Additional Observations:

Accuracy of tax payments is generally a strong area of compliance for the Brokerage. In part, this is the result of controls which prevent the placement of surplus lines business without the knowledge of the firm's Surplus Lines Coordinator. Invoicing for business placed with excess carriers cannot be completed unless the tax is billed simultaneously. The firm's accounting center, in Nashville, Tennessee provides a monthly report showing

all surplus lines placed and billed. Entries on this report can be compared with in-house placement records, which serve as a check and balance.

Recommendations: None.

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-8

Consumer and insurance department complaints responded to in accordance with statutes, rules, and regulations.

Comments: The review methodology for this standard has direct statutory requirements, i.e., DC Official Code §§ 31-2231.10 and 31-2231.18. The former citation states in part that no person shall fail to maintain its books, records, documents, and other business records in such order that data regarding complaints, claims, rating, underwriting, and marketing are not accessible and retrievable for examination.

DC Official Code § 31-2231.01 “Definitions” identifies insurers to include agents and brokers so the examiner made the Broker aware of this code citation.

Findings: The Broker is in compliance with the standard.

Observations: The Broker stated that it had no consumer complaints during the examination period and DISB records confirmed that none were in its database. The Broker was unaware of this standard, as it is usually seen as applying only to insurers. No consumer complaint process has been implemented that tracks complaint events as no consumer complaints have been made.

Recommendations: None.

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-9

If the surplus lines broker is responsible for such calculations then unearned premiums are correctly calculated and returned to appropriate party in a timely manner and in accordance with applicable statutes, rules and regulations.

Comments: The review methodology for this standard does not have a direct statutory requirement.

Findings: The Broker is in compliance with the standard.

Observations: The Broker’s sample contained only one unearned premium calculation and no calculation error or refund delay was noted.

Recommendations: None

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-10

The broker cooperates on a timely basis with examiners performing the examinations.

Comments: The review methodology for this standard has a direct statutory requirement. DC Official Code § 31-1403(b) states in part that every person from whom information is sought must provide the information to the examiners and must facilitate the examination and aid in the examination so far as it is in their power to do so.

Findings: The Broker is in compliance with the standard.

Observations: None

Recommendations: None

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-11

The surplus lines broker has procedures for the collection, use, and disclosure of information gathered in connection with insurance transactions so as to minimize any improper intrusion into the privacy of applicants and policyholders.

Comments: Pursuant to Title 26, Chapter 36 of the D.C. Municipal Regulations (DCMR) and Title V of the Gramm-Leach-Bliley Financial Modernization Act (GLB), the Broker has adopted a formal privacy policy and formulated procedures designed to safeguard non-public personal information of their clients.

Findings: The Broker is in compliance with the standard.

Observations: The Broker has corporate privacy policies that were provided to the examiner. The review of applications and correspondence found during the placements testing survey that the sample did not contain and that the Brokerage did not collect nonpublic personal health information in connection with their commercial practice. The need for special procedures and authorizations pertinent to the disclosure of such information to third parties did not apply. As it was determined that Willis has no joint marketing agreements in effect so the examiners did not find it necessary to do further exam procedures.

Recommendations: None

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-12

The broker has developed and implemented written policies, standards and procedures for the management of insurance information.

Comments: Pursuant to Title 26, Chapter 36 of the D.C. Municipal Regulations (DCMR) and Title V of the Gramm-Leach-Bliley Financial Modernization Act (GLB), the Broker has adopted a formal privacy policy and formulated procedures designed to safeguard non-public personal information of their clients.

Findings: The Broker is in compliance with the standard.

Observations: None

Recommendations: None

NAIC Market Conduct Examinations Handbook – Chapter X, Section B Standard B-13

The broker has policies and procedures to protect the privacy of nonpublic personal information relating to its customers, former customers and consumers that are not customers.

Comments: Pursuant to Title 26, Chapter 36 of the D.C. Municipal Regulations (DCMR) and Title V of the Gramm-Leach-Bliley Financial Modernization Act (GLB), the Broker has adopted a formal privacy policy and formulated procedures designed to safeguard non-public personal information of their clients.

Findings: The Broker is in compliance with the standard.

Observations: None

Recommendations: None

PLACEMENT; CANCELLATION/NONRENEWAL

In order to evaluate the Broker's placement and cancellation/nonrenewal practices, the examiner gathered data using informational requests, direct questioning, interviews, and presentations by the Broker staff and officers.

During the course of this part of the examination, the examiner used the same sample developed for the review of operations to determine if the Broker was meeting established industry standards. NAIC standards for "Placement; Cancellation/Nonrenewal, specifically C-4, C-5 are not applicable in this examination and are excluded from comments and findings. The following report section gives direct reference to the NAIC handbook standards examined.

All required disclosures are made in accordance with statutes, rules, and regulations.

Comments: The review methodology for this standard does not have a direct statutory requirement.

Findings: The Broker is not in compliance with the standard.

Observations: Among the sample of fifty (50) policy/marketing files reviewed in connection with placements testing, it was noted that at least eighteen (18) files reflect failure to provide warning of additional exposure as regards surplus lines placement. These exceptions indicate noncompliance with the Willis Excellence Model (WEM) procedure requiring that client binding confirmations include the appropriate surplus lines disclaimer language. Transactions files lacking the disclaimers are identified in the following table:

Client (Exam Code)	Binder/Policy No.	Sample No.
A	GU2924487	10
B	106938	11
B	NPG0106938	12
C	GHYC041	29
C	GHBX156	30
D	1153952	38
E	MG4404000	42
F.	D2306A1A01	45
F.	2798732	44
G	81684028	41
G	MD44040	43
H.	2795280	35
I	ZK0000158	46
J	ZK0000160	47
K	ZK0000159	48
L	ZK0000162	49
M	ZK0000161	50
N	90006367	28

Recommendations: While the District of Columbia does not require a disclosure standard, the examiner recommends that the Broker demonstrate its compliance by requiring client binding confirmations include the appropriate surplus lines disclaimer language as use of such a warning notice is regarded as a best practice in the industry.

NAIC Market Conduct Examinations Handbook – Chapter X, Section C Standard C-2

When issued by the surplus lines broker, all forms and endorsements forming a part of the contract are listed on the declarations page.

Comments: The review methodology for this standard does not have a direct statutory requirement.

Findings: The Broker is in compliance with the standard.

Observations: While the Broker's internal management procedures entail a thorough policy review and timely transmittal, the test checking portion of this examination phase noted seven (7) policy files with timed delivery exceptions.

Recommendations: None

NAIC Market Conduct Examinations Handbook – Chapter X Section C Standard C-3

The selected carrier was evaluated to ensure it complies with statutory requirements regarding financial condition.

Comments: The review methodology for this standard does not have a direct statutory requirement.

Findings: The Broker is in compliance with the standard.

Observations: During the period of this examination, the Broker placed business with forty-five (45) different surplus lines carriers. The examiners noted that policy files reviewed during placements testing reflect insurer ratings which generally exceed the Broker's minimum financial guidelines.

Recommendations: None

NAIC Market Conduct Examinations Handbook – Chapter X, Section C Standard C-6

Diligent effort was made to place the risk with an admitted carrier in compliance with statutes, rules, and regulations.

Comments: The review methodology for this standard can be found in DC Official Code § 31-2502.40 that states in part that prior to procurement of unauthorized policies the licensed agent or broker must make a diligent effort to place the insurance with authorized companies.

Findings: The Broker is in compliance with the standard.

Observations: The Broker's top ten (10) accounts were reviewed to particularly focus on this standard. Explanations were offered as to why standard markets had been unable to

respond to the entire range of insurance requirements. The review found that while the strong participation of admitted carriers was apparent in all the insurance programs provided by the Broker, it was determined that access to non-admitted markets had been required to meet demands for high limits (capacity) and coverages, such as California quake coverage that is unavailable in the admitted market.

Recommendations: None

SUMMARY OF SIGNIFICANT ISSUES

Standard B-6

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DC Official Code § 31-2502.40(a) that states in part that each broker so licensed for unauthorized policy procurement shall execute and file with DISB on or before the 10th day of each month an affidavit covering the policy transactions of the previous month.

Standard B-7

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DC Official Code § 31-2502.40(a) requires semi-annual payments on the 1st day of February and August. Examination of the Brokerage's surplus lines tax returns revealed five (5) late payments – on 2/16/04, 8/7/03, 3/7/03, 8/19/02, and 8/2/01.

DC Official Code § 31-2231.01 "Definitions" identifies insurers to include agents and brokers.

Standard C-1

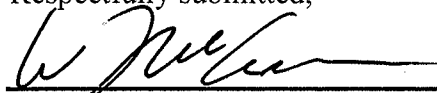
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It is recommended that compliance assurances agree to the Broker's "Excellence Model" procedures so all required disclosures are made.

ACKNOWLEDGMENT

In addition to the undersigned, Gerald B. Lyons, CPCU, FLMI, ACS, AMIM, AIM, CIE, of R L Regulatory Consultants, Inc., performed both field work and assisted in exam planning.

Respectfully submitted,



William F. McCune, MBA,CCP,CIPP,CFE(Fraud),CIE,CIDM,CPCU,CFE(Financial),CLU,LIFA,
FLMI,FLHC,RHU,PAHM,AIAF,AIAA,AIRC,AIC,API,ACS

Market Analysis Chief

For the DC Department of Insurance, Securities and Banking