



STATE OF NEW YORK
INSURANCE DEPARTMENT
25 BEAVER STREET
NEW YORK, NEW YORK 10004

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In the Matter of

**AON CORPORATION, AFFINITY INSURANCE SERVICES, INC.,
AON CONSULTING, INC., AON BENEFIT SERVICES INC.,
AON FINANCIAL SERVICES GROUP OF NEW YORK INC.,
AON RE, INC., AIS INSURANCE AGENCY INC., AON/ALBERT G.
RUBEN INSURANCE AGENCY, AON/ALBERT G.
RUBEN COMPANY (NEW YORK), INC., AON CONSULTING
OF FLORIDA, AON CONSULTING OF NEW JERSEY
(dba of AON CONSULTING, INC. , AON HAMOND &
REGINE, INC., AON PRIVATE RISK MANAGEMENT INSURANCE
AGENCY, INC., AON RISK SERVICES, INC. OF ARKANSAS,
AON RISK SERVICES, INC. OF COLORADO, AON RISK
SERVICES, INC. OF CONNECTICUT, AON RISK
SERVICES, INC. OF FLORIDA, AON RISK SERVICES, INC.
OF GEORGIA, AON RISK SERVICES, INC. OF ILLINOIS,
AON RISK SERVICES, INC. OF INDIANA, AON RISK
SERVICES, INC. OF KANSAS, AON RISK SERVICES, INC.
OF MARYLAND, AON RISK SERVICES, INC. OF
MASSACHUSETTS, AON RISK SERVICES, INC. OF MICHIGAN,
AON RISK SERVICES, INC. OF MINNESOTA, AON RISK
SERVICES, INC. OF NEBRASKA, AON RISK SERVICES, INC.
OF NEW JERSEY, AON RISK SERVICES, INC. OF NEW YORK,
AON RISK SERVICES, INC. OF OHIO, AON RISK SERVICES,
INC. OF OKLAHOMA, AON RISK SERVICES, INC. OF OREGON,
AON RISK SERVICES, INC. OF PENNSYLVANIA, AON RISK
SERVICES, INC. OF RHODE ISLAND, AON RISK SERVICES, INC.
OF VIRGINIA, AON RISK SERVICES, INC. OF WASHINGTON,
AON RISK SERVICES, INC. OF WASHINGTON D.C., AON RISK
SERVICES OF CENTRAL CALIFORNIA INSURANCE AGENCY
SERVICES, AON RISK SERVICES OF MISSOURI, INC., AON RISK
SERVICES. OF NORTHERN CALIFORNIA INSURANCE
AGENCY, AON RISK SERVICES, OF SOUTHERN CALIFORNIA
INSURANCE AGENCY SERVICES, AON RISK SERVICES OF
TEXAS, INC., AON SPECIALTY RE, INC., ARM INTERNATIONAL
CORP., ARM RISK CORP., FINANCIAL & PROFESSIONAL RISK
SOLUTIONS, INC., HUNTINGTON T. BLOCK INSURANCE AGENCY, INC.,
JOHNSON ROONEY WELCH, INC., K & K INSURANCE AGENCY,
MUIRFIELD AGENCY., SPECIAL RISK RESOURCES INSURANCE
AGENCY OF NEW YORK, INC., SWETT & CRAWFORD CORP;**

**CITATION
No. 2005-0001-C**

SWETT & CRAWFORD OF ILLINOIS, INC., SWETT & CRAWFORD OF MAINE, INC., SWETT & CRAWFORD OF OHIO, INC., SWETT & CRAWFORD OF PENNSYLVANIA, INC., and UMS,

Respondents.

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TO THE ABOVE NAMED RESPONDENTS:

YOU ARE HEREBY CITED to appear at a hearing to be held at the office of the New York State Insurance Department ("Department"), 25 Beaver Street, New York, New York, at 10:00 a.m. on the 22nd day of March, 2005, to show cause why all licenses issued to you by this Department should not be suspended or revoked, and all pending applications for licensure or renewal thereof denied; why an order should not be made assessing civil penalties against you pursuant to Section 2127 of the Insurance Law; why a report pursuant to Section 2405 of the Insurance Law should not be made charging you with determined violations; and why such other punitive, remedial or preventive action as may be authorized by law, including restitution of all commissions and fees improperly received from insurers and/or insureds, should not be imposed, by reason of the charge(s) and specification(s) hereinafter set forth.

CHARGE I

RESPONDENTS HAVE USED DECEPTIVE AND DISHONEST PRACTICES AND HAVE DEMONSTRATED UNTRUSTWORTHINESS WITHIN THE MEANING OF SECTION 2110(a)(4) OF THE INSURANCE LAW

1. Beginning in or about 1999, while acting as insurance brokers in connection with the placement of insurance for their clients, the Respondents used deceptive and dishonest practices, and demonstrated untrustworthiness, by engaging in the conduct alleged in the civil complaint filed in the Supreme Court of the State of New York, County of New York, by the Attorney General of the State of New York in the action entitled *The People of the State of New York v. Aon Corporation*. A copy of said complaint is attached hereto and fully incorporated herein by reference.

2. As alleged in said complaint, among other things, the Respondents:

(a) failed to fully disclose to their clients the nature and extent of additional compensation arrangements Respondents had entered into with insurers so as to enable their clients to understand the actual costs of the coverage and motivation of Respondents in placing the business with a particular insurer;

(b) acted against the best interests of their clients by placing business with insurers who paid Respondents the highest compensation or agreed to use Respondents' reinsurance services rather than with insurers that offered the best available coverage and pricing to the client; and

(c) acted against the best interests of their clients by suggesting that an insurer raise its quote for a client's business, withholding lower quotes for a client's business and placing the business with higher bidding insurers, and otherwise providing preferred treatment to certain insurers while excluding competing insurers from bidding for client's business.

CHARGE II

RESPONDENTS HAVE ENGAGED IN DETERMINED VIOLATIONS WITHIN THE MEANING OF SECTION 2402(c) OF THE INSURANCE LAW

3. The allegations of paragraphs 1 through 2 are repeated and realleged as if fully set forth herein.

4. Pursuant to Section 2402(c) of the Insurance Law, a determined violation is "any unfair method of competition or any unfair or deceptive act or practice, which is not a defined violation but is determined by the superintendent pursuant to section two thousand four hundred five of this article to be such method, act or practice."

5. The aforesaid conduct of Respondents constitutes a determined violation within the meaning of Section 2402(c).

PLEASE TAKE FURTHER NOTICE THAT:

(A) According to the records of the Insurance Department: Affinity Insurance Services, Inc. is licensed as a broker under Section 2104 of the Insurance Law and as an agent under Sections 2103(a) and 2103(b) of the Insurance Law; Aon Consulting, Inc. is licensed as an agent under Sections 2103(a) and 2103(b) of the Insurance Law; Aon Benefit Services, Inc. is licensed as an agent under Section 2103(a) of the Insurance Law; Aon Financial Services Group of New York, Inc. is licensed as a broker under Section 2104 of the Insurance Law and as an excess line broker under Section 2105 of the Insurance Law; Aon Re, Inc. is licensed as a reinsurance intermediary under Section 2106 of the Insurance Law; AIS Insurance Agency, Inc. is licensed as an agent under Sections 2103(a) and 2103(b) of the Insurance Law; Aon/Albert G. Ruben Insurance Agency is licensed as a broker under Section 2104 of the Insurance Law; Aon/Albert G. Ruben Company (New York), Inc. is licensed as a broker under Section 2104 of the Insurance Law, as an excess line broker under Section 2105 of the Insurance Law and as an agent under Sections 2103(a) and 2103(b) of the Insurance Law; Aon Consulting, Inc. of Florida is licensed as an agent under Section 2103(a) of the Insurance Law; Aon Consulting of New Jersey (dba of Aon Consulting, Inc. is licensed as an agent under Section 2103(a) of the Insurance Law; Aon Hamond & Regine Inc. is licensed as a broker under Section 2104 of the Insurance Law and as an excess line broker under Section 2105 of the Insurance Law; ; Aon Private Risk Management Insurance Agency, Inc. is licensed as an agent under Sections 2103(a) and 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Arkansas is licensed as an agent under Sections 2103(a) and 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Colorado is licensed as a broker under Section 2104 of the Insurance Law; Aon

Risk Services, Inc. of Connecticut is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Florida is licensed as a broker under Section 2104 of the Insurance Law and as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Georgia is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Illinois is licensed as a broker under Section 2104 of the Insurance Law and as an agent under Sections 2103(a) and 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Indiana is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Kansas is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Maryland is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Massachusetts is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Michigan is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Minnesota is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Nebraska is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services, Inc. of New Jersey is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of New York is licensed as a broker under Section 2104 of the Insurance Law, as an excess line broker under Section 2105 of the Insurance Law, as an agent under Sections 2103(a) and 2103(b) of the Insurance Law and as a reinsurance intermediary under Section 2106 of the Insurance Law; Aon Risk Services, Inc. of Ohio is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Oklahoma is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Oregon is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Pennsylvania is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services, Inc. of Rhode Island is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Virginia is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Washington is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services, Inc. of Washington D.C. is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Risk Services of Central California Insurance Agency Services is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services of Missouri, Inc. is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services of Northern California Insurance Agency is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services of Southern California Insurance Agency Services is licensed as a broker under Section 2104 of the Insurance Law; Aon Risk Services of Texas, Inc. is licensed as an agent under Section 2103(b) of the Insurance Law; Aon Specialty Re, Inc. is licensed as a reinsurance intermediary under Section 2106 of the Insurance Law; ARM International Corp. is licensed as a broker under Section 2104 of the Insurance Law and as an agent under Sections 2103(a) and 2103(b) of the Insurance Law; ARMRISK Corp. is licensed as a reinsurance intermediary under Section 2106 of the Insurance Law; Financial & Professional Risk Solutions, Inc. is licensed as an agent under Section 2103(b) of the Insurance Law and is licensed as a broker under Section 2104 of the Insurance Law and as an excess line broker under Section 2105 of the Insurance Law; Huntington T. Block Insurance Agency, Inc. is licensed as an agent under Section 2103(b) of the Insurance Law ; Johnson Rooney Welch, Inc. is licensed as an agent under Section 2103(b) of the Insurance Law; K & K Insurance Agency is licensed as an agent under Section 2103(b) of the Insurance Law and is licensed as a broker under Section 2104 of the Insurance Law and as an excess line broker under Section 2105 of

the Insurance Law; Muirfield Agency. is licensed as an agent under Section 2103(b) of the Insurance Law; Special Risk Resources Insurance Agency of New York, Inc. is licensed as a broker under Section 2104 of the Insurance Law and as an agent under Section 2103(b) of the Insurance Law; Swett & Crawford Corp. is licensed as an agent under Section 2103(b) of the Insurance Law and is licensed as a broker under Section 2104 of the Insurance Law and as an excess line broker under Section 2105 of the Insurance Law; Swett & Crawford of Illinois, Inc. is licensed as a broker under Section 2104 of the Insurance Law and as an excess line broker under Section 2105 of the Insurance Law; Swett & Crawford of Maine, Inc. is licensed as an agent under Section 2103(b) of the Insurance Law and is licensed as a broker under Section 2104 of the Insurance Law; Swett & Crawford of Ohio, Inc. is licensed as an agent under Section 2103(b) of the Insurance Law and is licensed as a broker under Section 2104 of the Insurance Law and as an excess line broker under Section 2105 of the Insurance Law; Swett & Crawford of Pennsylvania, Inc. is licensed as an agent under Section 2103(b) of the Insurance Law and is licensed as a broker under Section 2104 of the Insurance Law and as an excess line broker under Section 2105 of the Insurance Law; and UMS is licensed as a broker under Section 2104 of the Insurance Law. Aon Corporation is not licensed under any section of the Insurance Law.

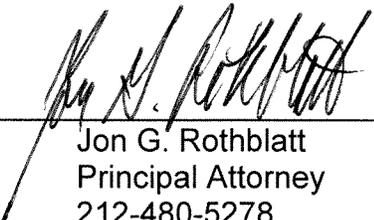
(B) This citation is issued pursuant to Sections 109, 303, 304, 305, 2110, 2127 and 2405 of the Insurance law.

(C) Your attention is directed to a statement in plain language, attached hereto, entitled "Summary of Hearing Procedures," summarizing the provisions of Department Regulation No. 97 (11 NYCRR 4). This statement contains important information concerning your rights and the Department's hearing procedures and should be read carefully. A copy of Regulation No. 97 will be furnished upon request.

(D) Should you fail to appear at the time and place fixed for the hearing, or any adjourned date thereof, the hearing will proceed as scheduled. Disciplinary action, if any, taken as a result of the hearing may result in the suspension or revocation of any and all licenses previously issued to you, the denial of any and all pending applications for licenses or renewal thereof, the imposition of civil penalties, and such other punitive, remedial or preventive action as may be authorized by law.

Dated: New York, New York
March 4, 2005

NEW YORK STATE INSURANCE DEPARTMENT

By: 
Jon G. Rothblatt
Principal Attorney
212-480-5278