



# Greater New York Insurance Companies

200 MADISON AVENUE / NEW YORK, NEW YORK 10016 / (212) 683-9700 Fax (646) 746-1339

Thomas D. Hughes, Esq.  
Telephone: 212-683-9700  
Email: thughes@gny.com

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*By Email (Nicholas.Gill@ct.gov)*

Nick Gill

Associate Examiner

Market Conduct Division

State of Connecticut Insurance Department

Re: *Greater New York Mutual 2020 CT Survey Examination*

Dear Mr. Gill:

Consistent with the requirements of section II, paragraph 3 of the Stipulation and Consent Order dated July 27, 2021 (the “Stipulation”), we provide our report of findings and a summary of actions taken to comply with the requirements of section II, paragraph 2 of the Stipulation. In the Stipulation, we admitted that during the period of examination six entities and thirteen individuals acted as our statutory agents without timely appointments. Our investigation found two causes for this issue, which are set forth below.

First, we untimely appointed agent Mike Daniels due to our oversight. We have had a relationship with Mr. Daniels for many years, and we first appointed Mr. Daniels as an agent on November 15, 2008. He should have been appointed as a new agent when he formed a new independent brokerage, MJD3 Associates. This was purely an oversight: we considered the preexisting appointment to have remained in force, particularly because all of the parties, including the insured and producer, were the same as when he was first appointed as a producer. Moreover, although MJD3 was a new entity, the new business purchased the previously appointed agency’s employees and insurance assets. We corrected this issue by making the required appointment of Mr. Daniels.

Second, the remainder of our untimely appointments was caused by staff turnover. During the period of examination, a staff member in our Connecticut office who handled agency appointments retired. The head of our Connecticut Branch Office also left our employ. Though appointments were made during this period, the person-power shortage slowed the process down and delayed some appointments. The new head of our Connecticut office promptly reviewed and updated our statutory appointments, which resulted in overlooked appointments being made in late 2020. Going forward, our head of the Connecticut office now reviews and timely updates appointments on a monthly basis.

We trust that this letter addresses the causes of the violations and our remedial action to prevent future violations of this nature. Should you have any questions or comments, please contact me.



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Very truly yours,

GREATER NEW YORK MUTUAL  
INSURANCE COMPANY

A handwritten signature in cursive script that reads 'Thomas D. Hughes'. The signature is written in dark ink on a light-colored, slightly textured background.

BY:

Thomas D. Hughes  
Executive Vice President & General Counsel,  
Corporate Secretary