

If You Used The Services Of Gallagher Entities (listed below) Or Other Broker Defendants (listed below) To Purchase Or Renew Insurance Or Reinsurance From Any Insurer Between August 26, 1994 And December 31, 2005, You Could Be Entitled To Monetary Relief From A Class Action Settlement

IF, DURING THE PERIOD AUGUST 26, 1994 THROUGH DECEMBER 31, 2005, INCLUSIVE, YOU

ENGAGED THE SERVICES OF THE GALLAGHER ENTITIES ("GALLAGHER") OR ANY OTHER BROKER DEFENDANT (BOTH AS IDENTIFIED BELOW) IN CONNECTION WITH THE PURCHASE OR RENEWAL OF INSURANCE OR REINSURANCE FROM ANY INSURER

YOU COULD BE ENTITLED TO PARTICIPATE IN A CLASS ACTION SETTLEMENT UNDER WHICH YOU WOULD RECEIVE MONETARY RELIEF REACHED IN THE ACTION ENTITLED IN RE: INSURANCE BROKERAGE ANTITRUST LITIGATION, MDL NO. 1663, CIVIL NOS. 04-5184 AND 05-1079 (GEB) PENDING IN THE UNITED STATES DISTRICT COURT, DISTRICT OF NEW JERSEY (THE "CLASS ACTION").

The following is only a summary of the class action settlement in In Re: Insurance Brokerage Antitrust Litigation. You are encouraged to obtain the detailed Notice. If you believe that you are eligible to participate in the class action settlement described in this Court-Ordered Published Notice but did not receive in the mail a detailed Notice describing the settlement, please visit www.gallaghersettlement.com, where you can obtain the detailed Notice, or contact the Court-approved Settlement Administrator as set out below to request a copy of the detailed Notice.

A settlement in the class action (and a related Illinois state court class action entitled *Village of Orland Hills v. Arthur J. Gallagher & Co.*, Case No. 00 CH 13855, Illinois Circuit Court, Cook County) has been reached with Gallagher (the "Gallagher Settlement" or "Gallagher Settlement Agreement"). The Class Action alleges violations of federal and state antitrust laws, the Racketeer Influenced and Corrupt Organizations Act, and common law arising out of: (i) certain insurers providing quotations to policyholders and prospective policyholders through certain brokers in connection with the placement and renewal of insurance contracts; and (ii) contracts, agreements, arrangements and understandings about the payment of commissions to brokers that are contingent upon, among other things, a broker placing a particular number of policies or dollar value of premium with the insurer.

If the Gallagher Settlement is finally approved by the Court, a settlement fund with \$28 million (plus applicable interest) will be created by Gallagher and will be distributed to those who fit within the description of the Settlement Class that is summarized above ("Settlement Class" or "Settlement Class Members"). A more complete description of the Settlement Class can be found in the detailed Notice.

In addition to this settlement fund of \$28 million, Gallagher will also pay a Court-approved award of attorneys' fees and expenses, incentive awards and all administrative costs incurred to implement the Gallagher Settlement – including the cost of establishing a toll-free telephone center to respond to Settlement Class Members' inquiries. **None of these costs will be deducted from the settlement fund.**

If you are a Settlement Class Member and you do not wish to participate in the Gallagher Settlement, you must request exclusion from the Settlement Class by no later than June 29, 2007.

If you think that you might be a Settlement Class Member, you can obtain more information – including a copy of the detailed Notice and Claim Form and other settlement related materials at www.gallaghersettlement.com. *Claim Forms must be received by the Settlement Administrator described below on or before November 16, 2007.*

WHAT DOES THE GALLAGHER SETTLEMENT PROVIDE?

At least \$28 million will be distributed in connection with the Gallagher Settlement.

In addition to the monetary relief, and as more fully explained in the detailed Notice, Gallagher will implement certain business reforms concerning:

- Permissible Forms of Compensation
- Prohibition on Contingent Compensation
- Prohibition of "Pay-to-Play" Arrangements
- Prohibition of "Bid-Rigging" Arrangements
- Prohibition of Reinsurance "Leveraging"
- Prohibition of Inappropriate Use of Wholesaler Insurance Brokers
- Mandated Disclosures to Clients

WHO IS PAYING THE ATTORNEYS' FEES AND OTHER EXPENSES THAT ARE BEING SOUGHT?

After Class Plaintiffs and Gallagher agreed on all other terms of the Gallagher Settlement Agreement, counsel for the named Plaintiffs ("Class Counsel") and Gallagher negotiated the amount of attorneys' fees and ex-

penses that Gallagher will, subject to Court approval, pay to Class Counsel. Class Counsel will seek an award of attorneys' fees and expenses of no more than Eight Million Eight Hundred Eighty-Five Thousand (\$8,885,000.00) Dollars. Gallagher has agreed that it will not object to paying fees and expenses up to that amount. The award of attorneys' fees and expenses to Class Counsel is subject to Court approval. Class Counsel intends to apply to the Court for an incentive award of Ten Thousand Dollars (\$10,000) to each named Plaintiff based upon the effort that each named Plaintiff has devoted to this litigation. Gallagher will pay attorneys' fees, expenses and the incentive awards in addition to the other amounts it is required to pay under the Gallagher Settlement Agreement. Thus, *you will not be responsible for any of Class Counsel's fees or expenses or the incentive awards, and none of those fees, expenses or awards will be deducted from the settlement relief.*

WHAT ARE THE LEGAL EFFECTS OF PARTICIPATING IN THE GALLAGHER SETTLEMENT?

If the Court approves the Gallagher Settlement, Plaintiffs and Gallagher will seek the entry of a Judgment and an Order Approving Settlement that, among other things, will:

- find that the settlement is fair, reasonable and adequate;
- finally certify the class for settlement purposes;
- dismiss the Class Action with prejudice as to the Gallagher Entities, meaning that no Settlement Class Member – including you (unless you timely exclude yourself) – will be able to bring another lawsuit or proceeding against any of the Releasees (as that term is defined in the Gallagher Settlement Agreement) based upon the claims that have, will be, or that could have been raised in this Class Action;
- incorporate the Release that is found in the Gallagher Settlement Agreement as part of the Order Approving Settlement;
- permanently bar Settlement Class Members from filing or participating in any lawsuit or other legal action against any or all Releasees arising from or relating to any and all claims that have been, will be, or that could have been raised in this Class Action;
- enter a bar order that will:
 - prevent any person or entity from commencing, prosecuting or asserting any claim (including any claim for indemnification or contribution) against any Releasee where the alleged injury to the barred person or entity is based upon that person's or entity's alleged liability to the Settlement Class or a Settlement Class Member, and
 - prevent any Releasee from commencing, prosecuting or asserting any claim (including any claim for indemnification or contribution) against any person or entity where the Releasee's alleged injury is based upon the Releasee's alleged liability to the Settlement Class or a Settlement Class Member;
- award attorneys' fees and expenses to Class Counsel;
- award incentive payments to the named Plaintiffs; and
- retain jurisdiction over all matters relating to the administration, enforcement and interpretation of the settlement.

As noted, if the Court approves the Gallagher Settlement, the Release that is found in the Gallagher Settlement Agreement will be incorporated into the Court's Order Approving Settlement. The Release describes the claims that Settlement Class Members will give up, as well as the identity of the Releasees – i.e., the people and entities that will be released. As discussed below, you can obtain a copy of the Release (including the definition of Releasees) from the Court-approved Settlement Administrator or from the websites of certain Class Counsel.

HOW WILL SETTLEMENT PAYMENTS BE MADE?

If you are a Settlement Class Member you will have to fill out a Claim Form and submit it to the Settlement Administrator, Complete Claim Solutions, LLC at Gallagher Insurance Brokerage Antitrust Settlement, c/o Complete Claim Solutions, LLC, P.O. Box 24749, West Palm Beach, FL 33416. You can obtain the Claim Form by visiting the website of the Court-approved Settlement Administrator at www.gallaghersettlement.com, by calling 1-866-459-3650, Monday through Friday from 9:00 a.m. to 5:00 p.m. EDT, by writing to Gallagher Insurance Brokerage Antitrust Settlement, c/o Complete Claim Solutions, LLC, P.O. Box 24749, West Palm Beach, FL 33416, or by sending an e-mail to gallagheradmin@completeclaimssolutions.com.

WHAT OPTIONS ARE AVAILABLE TO SETTLEMENT CLASS MEMBERS?

If you fall within the definition of a Settlement Class Member, you may either (i) participate in the Gallagher Settlement (and receive settle-

ment relief if the Court approves the Gallagher Settlement Agreement) or (ii) request exclusion from the Gallagher Settlement.

If you want to participate in the Gallagher Settlement, but you object to any term of the Gallagher Settlement Agreement, you may submit an objection to the Court. All objections must be filed with the Court and served on Class Counsel and Gallagher's Counsel by no later than June 29, 2007. The detailed Notice explains how to object.

On or before June 19, 2007, named Plaintiffs and/or Gallagher shall file a memorandum in support of the Settlement. On the same date, named Plaintiffs shall file their application for an award of attorneys' fees and expenses and incentive awards. Responses to the objections, if any, shall be filed by named Plaintiffs and/or Gallagher no later than July 10, 2007 and replies by any objectors shall be filed no later than July 16, 2007.

If you want to exclude yourself from the Gallagher Settlement, you must submit a written request to the Clerk of the Court. Your request must be postmarked by no later than June 29, 2007. The detailed Notice explains about how to exclude yourself.

WILL THE COURT HOLD A HEARING REGARDING THE GALLAGHER SETTLEMENT?

The Court will hold a hearing on July 24, 2007 at 1:00 p.m. EDT in Courtroom 4E in the United States Courthouse located at U.S. Courthouse Building, 402 East State Street, Trenton, New Jersey 08608, to consider whether to approve the Gallagher Settlement, including, among other things, the Plan of Allocation, and whether to grant Class Counsel's request for attorneys' fees, expenses and incentive awards for the named Plaintiffs. If you file an objection, you may appear at this hearing and ask to be heard by the Court, but you do not need to do so. If you (or an attorney hired at your expense) intends to appear at the hearing, you (or your attorney) must file a notice of intention to appear. The detailed Notice explains how to file and serve a notice of intention to appear.

The Court may choose to change the date and/or time of the hearing without further notice of any kind.

HOW CAN A SETTLEMENT CLASS MEMBER GET ADDITIONAL INFORMATION?

The Gallagher Settlement Agreement sets out the details of the Gallagher Settlement, including the terms of the Release by which Settlement Class Members will be bound if the Gallagher Settlement is approved. A complete description of the Plan of Allocation and the Release is also attached to the detailed Notice. Both the Gallagher Settlement Agreement and the detailed Notice (which includes the Release and the Claim Form) are available at the Court-approved Settlement Administrator's website, www.gallaghersettlement.com, by calling 1-866-459-3650, Monday through Friday from 9:00 a.m. to 5:00 p.m. EDT, by writing to Gallagher Insurance Brokerage Antitrust Settlement, c/o Complete Claim Solutions, LLC, P.O. Box 24749, West Palm Beach, FL 33416, or by sending an e-mail to gallagheradmin@completeclaimssolutions.com. The Notice is also available at the following Class Counsel websites: Cafferty Faucher LLP – www.caffertyfaucher.com; Whatley, Drake & Kallas, LLC – www.whatleydrake.com; Foote, Meyers, Mielke & Flowers LLC – www.foote-meyers.com; Furth, Lehmann & Grant LLP – www.furth.com; Levin, Fishbein, Sedran & Berman - www.lfsblaw.com; Lerach Coughlin Stoia Geller Rudman & Robbins, LLP – www.lerachlaw.com; Zwerling, Schachter & Zwerling, LLP – www.zsz.com; and at Gallagher Defendants' website, www.ajg.com.

Additional information regarding this Class Action may be obtained by visiting www.insurancebrokerageclasscounsel.com.

Additional information regarding the Gallagher Settlement may also be obtained by contacting the following Class Counsel:

Edith M. Kallas, Esq. Whatley, Drake & Kallas, LLC 1540 Broadway, 37 th Floor New York, NY 10036 E-mail: ekallas@whatleydrake.com	or	Bryan L. Clobes, Esq. Cafferty Faucher LLP 1717 Arch Street, 36 th Floor Philadelphia, PA 19103 E-mail: bclobes@caffertyfaucher.com
--	----	---

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE FOR INFORMATION

The Gallagher Settlement involves the following "Gallagher Entities":

AJG Canada ULC
AJG Capital, Inc.
AJG Chem Mod Holdings LLC
AJG Coal, Inc.
AJG Coal Indiana LLC
AJG Financial Services, Inc.
AJG Investments, Inc.
AJG North America ULC
AJG Two Pierce, Inc. (Delaware)
Artex Insurance Company Ltd
Artex Risk Solutions, Inc.
Artex Underwriting Managers Ltd.
Arthur J. Gallagher
Arthur J. Gallagher & Co.
Arthur J. Gallagher & Co. (Bermuda) Limited
Arthur J. Gallagher & Co. (Canada) Ltd.
Arthur J. Gallagher & Co. (Florida)
Arthur J. Gallagher & Co. (Illinois)
Arthur J. Gallagher & Co. - Greenville
Arthur J. Gallagher & Co. - Little Rock
Arthur J. Gallagher & Co. Insurance Brokers of California, Inc.
Arthur J. Gallagher & Co. of Kentucky, Inc.
Arthur J. Gallagher & Co. of Mississippi, Inc.
Arthur J. Gallagher & Co. of New York, Inc.
Arthur J. Gallagher & Co. of Tennessee, Inc.
Arthur J. Gallagher Brokerage and Risk Management Services, LLC
Arthur J. Gallagher Intermediaries (Bermuda) Limited
Arthur J. Gallagher Management (Bermuda) Limited
Arthur J. Gallagher Risk Management Services, Inc.
Arthur J. Gallagher Service Co. (Delaware)
Arthur J. Gallagher (UK) Limited
Arthur J. Gallagher Middle East BSC(c)
Arthur J. Gallagher Asia Pte Ltd.
Arthur J. Gallagher Asia Limited
Arthur J. Gallagher (L) BHD
Arthur J. Gallagher Australasia Holdings Pty. Ltd.
Arthur J. Gallagher Reinsurance Australasia Pty Ltd.
Arthur J. Gallagher (Aus) Pty Ltd.
Australis Group (Underwriting) Pty Ltd.
Aviaco Leasing Limited
Charity First Insurance Services, Inc.
C.W. Excess, Inc.
Commonwealth Premium Finance Corporation
Connor Hale Kerslake Limited

Edwin M. Rollins Company
Gallagher Bassett Services, Inc. (Delaware)
Gallagher Bassett of New York, Inc.
Gallagher Bassett International Ltd. (UK)
Gallagher Bassett Canada Inc.
Gallagher Basset Services Pty Ltd
Gallagher Bassett International S.A.
Gallagher Benefit Services, Inc.
Gallagher Captive Services (Cayman) Limited
Gallagher Healthcare Insurance Services, Inc.
Gallagher Healthcare Insurance Services of Kansas City, LLC
Gallagher Holdings Bermuda Company Limited
Gallagher Holdings (UK) Limited
Gallagher Lambert Group
Gallagher Loss Control Services, Inc.
Gallagher Re, Inc.
Gallagher Re Limited
GBS Administrators, Inc.
GBS Insurance and Financial Services, Inc.
GBS Retirement Services, Inc.
Interpacific Underwriting Agencies Pty Ltd.
Lamberson Koster & Co.
Manning & Smith Insurance, Inc.
MRS Holdings Limited
Morgan Read & Sharman Limited
Protected Insurance Company
Risk Management Partners Ltd.
Risk Placement Services, Inc. (Illinois)
Risk Placement Services of Arizona, Inc.
Risk Placement Services of Arkansas, Inc.
Risk Placement Services of Louisiana, Inc.
Risk Placement Services of Massachusetts, Inc.
Risk Placement Services of Nevada, Inc.
Risk Placement Services of New York, Inc.
Risk Placement Services of Pennsylvania, Inc.
Risk Placement Services of Texas, Inc.
Scholastic Risk Services Limited
Sobieski & Bradley of Nevada, Inc.
Strand Underwriting Limited
Western Litigation, Inc.
Wyatt Gallagher Bassett Workers Compensation Victoria Pty Ltd.

The other Broker Defendants in the Action (the "Broker Defendants") are:

Acordia, Inc.
Affinity Insurance Services, Inc.

Aon Broker Services, Inc.
Aon Consulting Inc.
Aon Corporation
Aon Group Inc.
Aon Re, Inc.
Aon Re Worldwide, Inc.
Aon Risk Services Companies, Inc.
Aon Risk Services, Inc. of Louisiana
Aon Risk Services, Inc. of Maryland
Aon Risk Services, Inc. of Michigan
Aon Risk Services Inc. U.S.
Aon Risk Services of Texas, Inc.
Aon Services Group, Inc.
Benefits Commerce
BB&T Corporation
BB&T Insurance Services, Inc.
Branch Banking and Trust Company
Brown & Brown, Inc.
Brown & Brown Insurance Benefits, Inc.
Frank H. Haack & Associates
Hilb, Rogal & Hobbs Company
Hub International Limited
Marsh & McLennan Companies, Inc.
Marsh Inc.
Marsh USA, Inc.
Marsh USA Inc. (Connecticut)
Mercer, Inc.
Mercer Human Resource Consulting LLC
Mercer Human Resource Consulting of Texas, Inc.
O'Neill Finnegan & Jordan Insurance Agency, Inc.
Seabury & Smith, Inc.
Stewart Smith Group
Summit Global Partners of Florida, Inc.
Talbot Financial Corporation
Universal Life Resources
ULR Insurance Services, Inc.
USI Holdings Corporation
USI Consulting Group
USI Insurance Service Corporation
USI Insurance Services of Florida, Inc. (d/b/a USI Florida)
Wells Fargo & Company
Willis Group Holdings Limited
Willis Group Limited
Willis North America, Inc.
Willis of New York, Inc.
Willis Re Inc.