

No. 2025-9585

**Official Order  
of the  
Texas Commissioner of Insurance**

**Date:** 11/3/2025

**Subject Considered:**

Willis Towers Watson Midwest, Inc.  
775 Yard Street, Ste 200  
Columbus, OH 43212-3891

Consent Order  
TDI Enforcement File No. 37495

**General remarks and official action taken:**

This is a consent order with Willis Towers Watson Midwest, Inc. (Willis Midwest). Willis Midwest failed to timely file surplus lines policies and related documents. Willis Midwest has agreed to pay an administrative penalty of \$2,925 for these violations.

**Waiver**

Willis Midwest acknowledges that the Texas Insurance Code and other applicable law provide certain rights. Willis Midwest waives all of these rights, and any other applicable procedural rights, in consideration of the entry of this consent order.

**Findings of Fact**

1. Willis Midwest, license number 1488676, holds a surplus lines license issued by the Texas Department of Insurance.
2. Pursuant to TEX. INS. CODE § 981.105(a), a surplus lines insurance agent must file with the Surplus Lines Stamping Office of Texas either:
  - a. a copy of the policy issued, or
  - b. if the policy has not yet been issued, a copy of the certificate, cover note, or other confirmation of insurance delivered to the insured.

# 2025-9585

Commissioner's Order

Willis Towers Watson Midwest, Inc.

Page 2 of 4

This information is due not later than the 60th day after the later of the effective date or the issue date of new or renewal surplus lines insurance.

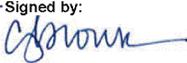
3. In 2024, Willis Midwest filed surplus lines policies and related documents late.
4. The commissioner previously disciplined Willis Midwest for violating TEX. INS. CODE § 981.105(a) in Official Order No. 2024-8895, entered on October 7, 2024.

## Conclusions of Law

1. The commissioner of insurance has jurisdiction over this matter pursuant to TEX. INS. CODE §§ 82.051-82.055, 84.021-84.044, and 981.105.
2. The commissioner of insurance has authority to informally dispose of this matter under TEX. GOV'T CODE § 2001.056, and TEX. INS. CODE §§ 36.104 and 82.055.
3. Willis Midwest has knowingly and voluntarily waived all procedural rights to which it may have been entitled regarding the entry of this order, including, but not limited to, issuance and service of notice of intention to institute disciplinary action, notice of hearing, a public hearing, a proposal for decision, rehearing by the commissioner, and judicial review.
4. Willis Midwest violated TEX. INS. CODE § 981.105(a) by failing to timely file new or renewal surplus lines policies and related documents.

## Order

It is ordered that Willis Towers Watson Midwest, Inc. must pay an administrative penalty of \$2,925 within 30 days from the date of this order. The administrative penalty must be paid as instructed in the invoice, which the department will send after entry of this order.

Signed by:  
  
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Cassie Brown  
Commissioner of Insurance

**2025-9585**

Commissioner's Order

Willis Towers Watson Midwest, Inc.

Page 3 of 4

Recommended and reviewed by:



Leah Gillum, Deputy Commissioner  
Fraud and Enforcement Division



Nancy Williams, Staff Attorney  
Enforcement

**Affidavit**

**THE STATE OF** NEW JERSEY §

**COUNTY OF** SOMERSET §

Before me, the undersigned authority, personally appeared the affiant, who being by me duly sworn, deposed as follows:

"My name is Susan Hu. I am of sound mind, capable of making this statement, and have personal knowledge of these facts which are true and correct.

I hold the office of Vice President and am the authorized representative of Willis Towers Watson Midwest, Inc. I am duly authorized by the organization to execute this statement.

Willis Towers Watson Midwest, Inc. has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."



Affiant

SWORN TO AND SUBSCRIBED before me on 10/17, 2025.

(NOTARY SEAL)

**ERNEST D'AMBROSIO**  
Notary Public  
State of New Jersey  
My Commission Expires Sept. 21, 2029  
I.D.# 2179256



Signature of Notary Public

ERNEST D'AMBROSIO  
Printed Name of Notary Public