

No. **2025-9598**

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

**Date: 11/14/2025**

**Subject Considered:**

Willis Towers Watson Insurance Services West Inc.  
333 Bush Street, Suite 775 Floor 7  
San Francisco, California 94104

Consent Order  
TDI Enforcement File No. 37523

**General remarks and official action taken:**

This is a consent order with Willis Towers Watson Insurance Services West Inc. (Willis Towers West). Willis Towers West failed to timely file surplus lines policies and related documents. Willis Towers West has agreed to pay an administrative penalty of \$10,800 for these violations.

**Waiver**

Willis Towers West acknowledges that the Texas Insurance Code and other applicable law provide certain rights. Willis Towers West 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 Towers West, license number 1416555, 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

# 2025-9598

Commissioner's Order

Willis Towers Watson Insurance Services West Inc.

Page 2 of 4

- 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.

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 Towers West filed surplus lines policies and related documents late.
4. The commissioner previously disciplined Willis Towers West for violating TEX. INS. CODE § 981.105(a) in Official Order No. 2023-8253, entered on October 03, 2023.
5. The commissioner previously disciplined Willis Towers West for violating TEX. INS. CODE § 981.105(a) in Official Order No. 2024-8896, entered on October 07, 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 Towers West 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 Towers West violated TEX. INS. CODE § 981.105(a) by failing to timely file new or renewal surplus lines policies and related documents.

# 2025-9598

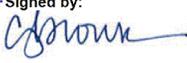
Commissioner's Order

Willis Towers Watson Insurance Services West Inc.

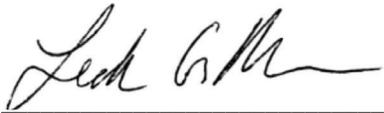
Page 3 of 4

## Order

It is ordered that Willis Towers Watson Insurance Services West Inc. must pay an administrative penalty of \$10,800 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:   
FC5D7EDDFFBB4F8...  
Cassie Brown  
Commissioner of Insurance

Recommended and reviewed by:



Leah Gillum, Deputy Commissioner  
Fraud and Enforcement Division



Stephanie Andrews, Attorney  
Enforcement

