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# CITY OF DANBURY

OFFICE OF THE MAYOR  
DANBURY, CONNECTICUT 06810

MARK D. BOUGHTON  
MAYOR  
February 23, 2005

(203) 797-4511  
FAX (203) 796-1666

Honorable Members of the Common Council  
155 Deer Hill Avenue  
Danbury, Connecticut 06810

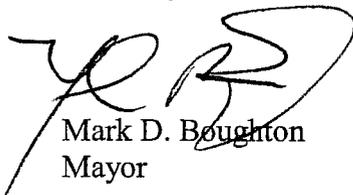
Re: Insurance Consultants  
Class Action

Dear Council Members:

Enclosed please find a letter from attorney Gary B. O'Connor, a partner with the law firm of Drubner, Hartley & O'Connor, L.L.C. Mr. O'Connor's letter describes ongoing national class action litigation brought against some of the nations largest insurance brokers as a result of alleged abuses committed by these companies to the detriment of consumers like the City of Danbury. Mr. O'Connor's firm is currently investigating the activities of Danbury's past insurance consultant, Aon Corporation and its affiliates, to determine whether Aon may have committed deceptive and abusive practices in connection with its business dealings with municipalities.

In order to participate actively in this investigation and possible litigation on the city's behalf, I recommend the appointment of the law firm of Drubner, Hartley & O'Connor, L.L.C. as special Counsel pursuant to the provisions of section 6-4 of the Danbury Municipal Charter. If you have any questions, please contact me.

Sincerely,



Mark D. Boughton  
Mayor

**DRUBNER, HARTLEY & O'CONNOR, L.L.C.**

**ATTORNEYS AT LAW**

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February 22, 2005

Honorable Mark D. Boughton  
Office of the Mayor  
City of Danbury  
155 Deer Hill Avenue  
Danbury, CT 06810

**Re: Insurance Broker Investigation/Litigation**

Dear Mayor Boughton:

I am a partner with the law firm of Drubner, Hartley & O'Connor, L.L.C. Our firm has been at the forefront of uncovering abuses committed by large national insurance brokers. In fact, our firm filed one of the first national class actions against Marsh & McLennan Companies, Inc. and its affiliated companies claiming damages for unlawful practices including its receipt of undisclosed contingent fees and commissions which affected its ability to provide the most appropriate services to its customers. Since that time, numerous attorneys general and regulatory agencies throughout the country have confirmed our initial findings and have disclosed additional unlawful practices such as bid rigging. These actions have resulted in the insurance consumer getting less than the best deal.

Municipalities throughout the country are now wondering whether they have paid excessive administrative expenses and insurance commissions as a result of the gross conflicts of interest among the largest insurance brokers. To that end, Drubner, Hartley & O'Connor is currently investigating the activities of Aon Corporation and its affiliates to determine whether Aon may have committed the same deceptive and abusive practices in connection with its business dealings with municipalities such as Danbury.

We ask that the City of Danbury retain our firm to investigate Aon's brokerage relationship with Danbury and, if necessary, represent your City in a class action against Aon and any other entity whose actions resulted in damages to the City as a result of the abusive practices outlined in this letter. We expect to work collaboratively with a number of other law firms including Lerach Coughlin Stoia Geller Rudman & Robbins LLP and Milberg Weiss

Honorable Mark D. Boughton

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Bershad & Schulman LLP, two of the largest class action firms in the country. Our firm would expect to be hired on a contingency basis so that there will be no expense to the City of Danbury.

To assist you in your decision, I would like to offer you some information on our firm. Drubner, Hartley & O'Connor is recognized in this State as a leader in complex class action lawsuits and complex litigation. We have been involved in some of the most important class actions of the past decade. For example, Drubner, Hartley & O'Connor represented thousands of victims of the Colonial Realty syndication scandal and recovered in excess of \$100 million on behalf of its clients. Likewise, in 1995, Drubner, Hartley & O'Connor joined with other prominent class action firms throughout the country to file suit against Prudential Insurance Company for misleading sales practices targeting the elderly. A settlement was reached providing policyholders reparations valued at more than \$1 billion. Currently, Drubner, Hartley & O'Connor represents physicians and state medical societies in a landmark class action challenging the unfair and deceptive practices of the major managed care organizations. To date, our firm, in conjunction with a number of other firms throughout the country, have reached settlements with Aetna and Cigna. These settlements have corrected many of the managed care companies' egregious claims policies. It is our hope that physicians will now be able to spend more time with their patients and less time with the managed care bureaucracy. We believe that these cases illustrate our ability to effectively litigate against some of the largest companies in the world and to structure creative solutions for our clients.

We hope that you consider retaining our firm. If you have any additional questions, please do not hesitate to contact me.

Very truly yours,



Gary B. O'Connor

GBO/sml