

EXHIBIT 2

Case No. 11 Civ 5843 (JPO)

DECLARATION OF JAY WARD BROWN IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO DISMISS
DEFENDANTS' COUNTERCLAIM

(2006 License Renewal Questionnaire [NYDOI/Gilman-00126])

QUESTION-ANSWER

Processed Date: 10/07/2006

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Name GILMAN WILLIAM W

License No [REDACTED]

Bus Typ 1

Class BR

APPLICATION TYPE REN

Question	ESB 48922	Answer
Background Question		
1 Are you under obligation to pay child support?		N
If Yes: a) Are you current or less than 4 months in arrears?		
b) Are you paying by Income Execution Plan agreed to by courts or parties?		
c) Is the obligation the subject of pending court proceeding?		
d) Are you receiving public assistance or supplemental security income?		
2 Since execution and filing of your last application, other than traffic violations, have you, or any business in which you are or were an owner, partner, officer or director, during your connection therewith, been convicted of, or are you currently charged with, committing a crime, whether or not adjudication was withheld?		Y
"Crime" includes a misdemeanor, felony, or a military offense. You may exclude misdemeanor traffic citations and juvenile offenses.		
"Convicted" includes, but is not limited to, having been found guilty by verdict of a judge or jury, having entered a plea of guilty or nolo contendere, or having been given probation, a suspended sentence or a fine.		
3 Since execution and filing of your last application, other than traffic violations, have you, or any business in which you are or were an owner, partner, officer or director, during your connection therewith, been involved in an administrative proceeding regarding any professional or occupational license?		N
"Involved" means having a license censured, suspended, revoked, canceled, or terminated; or being assessed a fine, placed on probation or surrendering a license to resolve an administrative action.		
"Involved" also means being named as a party to an administrative or arbitration proceeding which is related to a professional or occupational license.		
"Involved" also means having a license application denied or the act of withdrawing an application to avoid a denial. You may exclude terminations due solely to non-compliance with continuing education requirements or failure to pay a renewal fee.		
Since you answered yes to the above question, is your answer based solely upon an action, where the basis, for the charges contained therein, is directly or indirectly from the joint investigation by the New York Superintendent and Attorney General involving compensation, which led to charges of bid rigging, steering and other deceptive practices against a corporate entity in which you are or were an owner, partner, officer or director?		
4 Since execution and filing of your last application, has any demand been made or judgment rendered against you, OR any business in which you are or were an owner, partner, officer or director, during your connection therewith, for overdue monies by an insurer, insured or producer, or have you been subject to a bankruptcy proceeding? (Only include bankruptcies that involve funds held on behalf of others.)		N
5 Since execution and filing of your last application, have you, or any business in which you are or were an owner, partner, officer or director, during your connection therewith, been notified by any jurisdiction to which you are applying of any delinquent tax obligation that is not the subject of a repayment agreement? (Any obligation that has been repaid or was a part of a bankruptcy proceeding may be excluded.)		N
6 Are you, or any business in which you are or were an owner, partner, officer or director, during your connection therewith, currently a party to, or have you or any business in which you are or were an owner, partner, officer, or director, during your connection therewith, been found liable in any lawsuit or arbitration proceeding involving allegations of fraud, misappropriation or conversion of funds, or misrepresentation or breach of fiduciary duty?		Y
Since you answered yes to the above question, is your answer based solely upon a lawsuit, where the basis, for the charges contained therein, is directly or indirectly from the joint investigation by the New York Superintendent and Attorney General involving compensation, which led to charges of bid rigging, steering and other deceptive practices against a corporate entity in which you are or were an owner, partner, officer or director?		
7 Since execution and filing of your last application, have you, or any business in which you are or were an owner, partner, officer or director, during your connection therewith, had an insurance agency contract or any other business relationship with an insurance company terminated for any alleged misconduct?		N