

STATE OF OHIO
DEPARTMENT OF INSURANCE

IN THE MATTER OF:)
THE USAA INSURANCE GROUP)
)
MARKET CONDUCT EXAMINATION)

CONSENT ORDER

The Superintendent of the Ohio Department of Insurance ("Superintendent") is responsible for administering Ohio insurance laws pursuant to Section 3901.011 of the Ohio Revised Code. The USAA Insurance Group ("Company") is authorized to engage in the business of insurance in the state of Ohio.

SECTION I

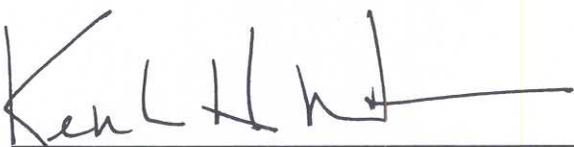
The Superintendent has alleged that the Company's agent licensing practices were not in compliance with Ohio Revised Code Section 3905.01 and 3905.011. The Company neither admits nor denies the allegation. The Company agrees that only duly appointed and licensed Ohio agents will engage in activities defined in Ohio Revised Code Section 3905.01 in sales or contacts with Ohio consumers.

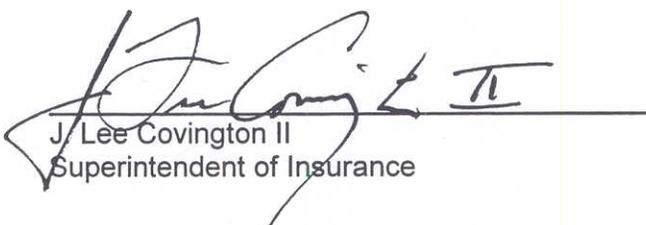
SECTION II

THE PARTIES FURTHER AGREE THAT:

- A. The Company has been advised of its right to a public hearing and right to appeal this Order pursuant to O.R.C. Chapter 119 and the Company hereby waives such rights.
- B. The Superintendent and the Company enter into this Consent Order to resolve the agent licensing allegations as stated in Section I of this order.
- C. The company agrees to monitor its personnel to ensure compliance with Ohio agent licensing and appointment laws. The Company represents and warrants that its current sales, marketing, and agent licensing practices are in full compliance with Ohio law.
- D. The Company will pay an administrative fine in the amount of \$30,000 by check or money order made payable to the Ohio Department of Insurance within 14 days of the execution of this order.
- E. The Company waives any and all causes of action, claim or rights, known or unknown, which he may have against the Department, and any employees, agents, consultants, contractors or officials of the Ohio Department of Insurance, in their individual and official capacities, as a result of any acts or omissions on the part of such persons or firms arising out of this matter.

F. This Consent Order shall have the full force and effect of an Order of the Superintendent and shall be entered in the Department's Journal.

By: 
Kent H. Williams
Senior Vice President
USAA

Date: August 13, 2002 
J. Lee Covington II
Superintendent of Insurance