



FROM: The Secretary to Lloyd's Disciplinary Board  
LOCATION: 58/SE1  
EXTENSION: 5530  
DATE: 6 November 1998  
REFERENCE: 108/98  
SUBJECT: JANE BRADFORD

SUBJECT AREA(S): Disciplinary  
ATTACHMENTS: Notice of Censure  
ACTION POINTS: For information only  
DEADLINE: None

Jane Bradford has admitted five charges of discreditable misconduct contrary to the Misconduct, Penalties and Sanctions Byelaw (No. 9 of 1993).

At the material time Miss Bradford was employed as a junior broker and was a registered substitute at Lloyd's. The misconduct arose through Miss Bradford:

- i) Representing to her clients that she had placed risks in the market when in fact she had not done so;
- ii) Procuring by deception scratches of underwriters on a slip; and
- iii) Forging underwriters' scratches on various slips.

Full details of the events giving rise to the charges are contained in the attached Notice of Censure.

Miss Bradford received the following penalties in respect of her admitted misconduct:

- i) Permanent suspension from the right of admission to the Room and other parts of the premises of Lloyd's;
- ii) Permanent suspension from the right to act in any capacity in relation to any Lloyd's business or any class or classes of such business;
- iii) That she be Censured in accordance with the terms of the attached Notice of Censure.

Having regard to Miss Bradford's means there was no award of costs.

This case was determined by the Lloyd's Disciplinary Board and its decision gives effect to a settlement of these proceedings agreed between Miss Bradford and the Council pursuant to paragraph 3 of the Lloyd's Disciplinary Rules (Schedule 2 to the Disciplinary Committees' Byelaw (I%.31 of 1996)).

This bulletin has been sent to all underwriting agents and Lloyd's advisors, Lloyd's brokers, corporate members, market associations, the ALM and recognised auditors.

AP Barber  
Secretary  
Lloyd's Disciplinary Board

NOTICE OF CENSURE

JANE BRADFORD

Jane Bradford ("Miss Bradford") who at the relevant time was employed as a junior broker for Ian McCall International Limited ("McCall's"), a Lloyd's broker. Miss Bradford was a registered substitute at Lloyd's, and has admitted five charges of discreditable misconduct contrary to the Misconduct, Penalties and Sanctions Byelaw (No. 9 of 1993). The allegations of misconduct include occasions where Miss Bradford;

- i) Represented to her clients that she had placed risks in the market when in fact she had not done so;
- ii) Procured by deception the scratches of underwriters on a slip; and
- iii) Forged underwriters' scratches on various slips.

**The 'JAG' Risk**

In or around May 1996, McCall's sought to extend a policy known as "the JAG distribution risk" ("JAG") as a loss had been notified and the lead underwriter requested that an extension to the policy be sought. When McCall's presented this risk to the following underwriters shown on the slip it became clear that only the lead underwriter had ever written this policy (having written a 10% line). The JAG slip contains the genuine scratches of the following underwriters. However, the reference numbers on those scratches referred not to the JAG policy but to two separate, and properly written policies. The investigation revealed that in early April 1996, Miss Bradford approached the following underwriters regarding the properly written risks stating that McCall's had lost these slips. The following underwriters were therefore asked to "re-scratch" duplicate slips. This they did, but what they had re-scratched were not the policies they had properly underwritten but instead a slip of the JAG risk which they had never underwritten. Miss Bradford admitted responsibility for placing the two properly written risks. She confirmed she was the placing broker on the JAG risk and that the risk had not in fact been placed and that when she sent a fax confirming 100% cover

she knew that the JAG risk had not been placed. She confirmed that this was done without the knowledge or consent of her employers and that the scratch on the two properly written slips had been used for the JAG slips in order to deceive the following underwriters on the JAG risk.

#### The Aleida Risk

Miss Bradford was responsible for the placing of a policy of insurance known as Aleida Custom Brokers ("the Aleida risk") on behalf of a producing broker in Florida USA. On or before 8 November 1995, the producing broker requested that the Aleida risk be renewed. By correspondence dated 5 November 1995, Miss Bradford confirmed to the producing broker that the Aleida risk had been renewed on the existing terms of 100% at Lloyd's when no renewal had in fact been made.

#### The Trailer Risk

Miss Bradford was at all material times solely responsible for the placing of a policy known as "Southeastern Trailer and Container" ("the Trailer risk") on behalf of a producing broker in Florida USA. On or before 22 April 1996, the producing broker requested that the Trailer risk be renewed. Thereafter, Miss Bradford falsely reported to the producing broker that the Trailer risk had been renewed, and forged the underwriters scratch upon a slip falsely representing thereon that underwriters had underwritten 1000A of the Trailer risk on 22 April 1996.

#### The Avairies Risk

Miss Bradford was solely responsible for the placing of a policy of insurance for Parotise Avairies Inc ('the Avairies risk') on behalf of a US producing broker. On or before 28 June 1995, the producing broker requested that the Avairies risk be renewed. By correspondence dated 28 June 1995, Miss Bradford confirmed to the producing broker that the Avairies risk had been 100% renewed at Lloyd's knowing or believing no renewal cover had in fact been placed. In support of this assertion Miss Bradford forged the underwriters scratch falsely representing that the underwriter had underwritten 100°A of the Avairies risk on 1 May 1995.

## The Valdez Risk

Miss Bradford was at all material times solely responsible for the placing of a policy of insurance for Patricia and Jose de Valdez ("the Valdez risk") on behalf of a US producing broker. On or before 8 February 1996, the producing broker requested that Valdez risk be renewed. By correspondence dated 8 January 1996, Miss Bradford falsely represented to the US producing broker that the Valdez risk had been 100% renewed at Lloyd's knowing or believing that no renewal cover had been placed. Additionally, in support of this assertion Miss Bradford forged the underwriter's scratch on a proposal form falsely representing thereon that an underwriter had underwritten 50% of the Valdez risk on 1 May 1996.

Miss Bradford has admitted that by her actions she has engaged in discreditable misconduct with a lack of good faith.

The following penalties have therefore been imposed upon Miss Bradford.

- i) That she be permanently suspended from the right of admission to the Room and other parts of the premises of Lloyd's;
- ii) That she be permanently suspended from the right to act in any capacity in relation to any Lloyd's business or any class or classes of such business;
- iii) That she be censured in accordance with the terms of this document,

In assessing the relevant penalties account has been taken of the following facts;

- a) That Miss Bradford made frank admissions in interview; and
- b) Miss Bradford has admitted the charges of misconduct and concluded a settlement with Lloyd's without incurring the expense of full disciplinary proceedings.

Having regard to Miss Bradford's means there was no award of costs.

## LLOYD'S DISCIPLINARY BOARD