

# Ann Young Black

SHAREHOLDER

MIAMI

305.347.6859

305.530.0055

CONNECT

ablack@carltonfields.com

LinkedIn

## Overview

Ann Black counsels financial services clients on a broad range of insurance, securities, and business issues. She regularly advises clients developing new and innovative life and annuity products and on the insurance and securities issues impacting those products. Ann also advises clients on the laws and regulations regarding the sale, distribution, issuance, administration and operation of, and benefit payment practices related to, these products. Clients also seek Ann's guidance on insurtech initiatives, including the use of big data, artificial intelligence and machine learning, and tech-driven customer engagement ventures.

Many of Ann's clients develop innovative life and annuity contracts and have sought her advice on state insurance law and IIPRC requirements or limitations on the products' innovative terms and features. She regularly reviews new product specifications and works with product actuaries on the new product's pricing or risk mitigation features. She has advised on the status of insurance products as securities, as well as on the development or use of hedge funds within insurance products.

Ann counsels financial services clients on the federal and state securities and insurance regulations governing sales, marketing, and distribution of various insurance products. More recently, she has been guiding financial services clients on the impact of proposed and adopted federal and state regulation with respect to suitability, best interest, fiduciary duty, and generally the duty of care, with respect to the distribution of variable and fixed annuity products. To the extent that the distribution arrangements require new business relationships, she advises clients on the contractual issues.

She also provides litigation and regulatory risk counseling on federal and state securities issues and state insurance issues, as well as assisting on state insurance market conduct exams, regulatory investigations, and regulatory proceedings. This includes advising clients on litigation and regulatory risk relating to, and exams into, insurer practices with respect to suitability, replacements, marketing materials, underwriting, claims practices, unclaimed property, and retained asset accounts.

Ann also advises a wide variety of other clients on: (i) legal structure, formation, and contractual issues; and (ii) securities, insurance, and derivatives regulatory matters in a variety of transactions.

Ann is the co-chair of the Life, Annuity, and Retirement Solutions Industry Group.

## Experience

- Designed and advised on the status of fixed declared rate annuities with market value adjustments and fixed index annuities under Section 3(a)(8) of the Securities Act of 1933 and the Harkin Amendment.
- Designed and drafted innovative life and annuity contracts, including fixed index products with unique index crediting options and guaranteed lifetime withdrawal benefits, structured index products, contingent deferred annuities or synthetic annuities to be sold with managed accounts, and bank-owned and corporate-owned life insurance contracts that include stable value features. This also includes advising on various state and insurance issues, including insurable interest, classification as life insurance, and filing issues.
- Developed suitability programs and procedures to comply with the NAIC Suitability in Annuity Transactions Model Regulation and state variations.
- Assessed various distribution arrangements' compliance with the Department of Labor's amendment to the definition of fiduciary and related exemptions.
- Performed risk analysis of products, sales materials, and suitability and replacements programs based on current actions by state attorneys general and insurance regulatory authorities.
- Advised on and respond to attorney general and state insurance regulatory authority investigations and market conduct examinations, including subsequent litigation proceedings.
- Advised on a variety of insurance regulatory matters, including: (i) point of sale requirements, including suitability analysis, replacement requirements, and disclosures; (ii) advertising and marketing of life and annuity products, including contract summaries, life and annuity illustrations, television advertisements, and global branding campaigns; (iii) product design, including required provisions for individual and group life and annuity products and nonforfeiture issues; (iv) insurable interest; (v) eligible groups and group coverage issues; (vi) producer, third-party administrator and managing general agent licensing, audit and oversight and other related regulatory requirements; and (vii) discrimination, rebating, and other unfair trade practice issues.
- Negotiated and draft various insurance service and insurance administrative contracts.

# Areas of Focus

## Practices

- Cost of Insurance and Other Challenges to Non-Guaranteed Element Determinations
- Digital and E-Commerce Engagement and Innovation
- ERISA Employee Benefit Plan Litigation
- Financial Services Regulatory
- Insurtech
- Sales Practices – Market Conduct Litigation
- Life, Annuity, and Retirement Litigation
- Business Transactions
- Government Law & Consulting
- Securities Litigation and Enforcement
- Securities Transactions and Compliance
- Insurance
- Technology

## Industries

- Life, Annuity, and Retirement Solutions
- Insurance
- Securities & Investment Companies
- Technology

# Insights

05.09.2024

NAIC Takes Dive Start on Investment Management Agreements With New Guidance for Insurers

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05.09.2024

Cybersecurity and AI Certification

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05.09.2024

NAIC Groups Carve Up the Mountain at the Winter Meeting

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05.09.2024

Current Standings of AI Guidance and Requirements by State

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05.09.2024

Racing Ahead: Privacy, Cybersecurity, and AI Heats for the Life Insurance Industry

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01.11.2024

Lawsuits Alleging Violations of Illinois' GIPA Are Piling Into Court Like Clowns Out of a Circus Car

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01.11.2024

In the Big Top Spotlight: NAIC Model Bulletin on the Use of Artificial Intelligence Systems by Insurers

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01.11.2024

NAIC H Committee Continues as Ringmaster Coordinating Numerous Initiatives

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09.28.2023

NAIC Privacy Working Group Goes All-in on New Draft Privacy Model

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09.28.2023

New York Department of Financial Services Plays Pit Boss for Consumer Protection

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09.28.2023

NAIC Innovation, Cybersecurity, and Technology (H) Committee Gets in on the Action

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08.04.2023

Colorado DOI Fast-Tracks Big Data Governance Rulemaking

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06.20.2023

Colorado DOI Summer Reading for Life Insurers

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05.25.2023

Regulators Looking to Various Kitchen Tools to Regulate Insurers' Use of Artificial Intelligence and Machine Learning

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05.25.2023

NAIC's New Privacy Protections Recipe

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03.29.2023

Opening Day: Regulators Showcase Big Data Initiatives at NAIC Spring Meeting

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03.24.2023

March Madness Begins: NAIC's New Draft Privacy Model

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03.09.2023

Auto Insurers to Join Life Insurers at Colorado DOI's Big Data Dance

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02.28.2023

Regulators Gearing Up to Monitor Accelerated Underwriting Programs

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02.16.2023

Insurers' Vendor Relationships May Get Wintery Gusts: A Chill for Consumer Data, Artificial Intelligence (AI), and Machine Learning (ML) Services?

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02.16.2023

No Hibernation for Issuers of Index-Linked Variable Annuities and Index Universal Life

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02.16.2023

A Flurry of Algorithmic Activity at the NAIC 2022 Fall National Meeting

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02.16.2023

New Year, New Privacy Shakedowns: Six Resolutions for Keeping Warm

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02.10.2023

Colorado February 7 Stakeholder Meeting Shines Light on the Departments Draft Proposed Data Governance Rule

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02.06.2023

A New Draft Privacy Model Blooms From the NAIC Privacy Working Group

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02.03.2023

Does Colorado's Draft Big Data Governance Rule Foretell of a Long Winter or an Early Spring?

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11.03.2022

What Can Insurers Do to Engage With Insurance Consumer

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09.29.2022

Colorado Division of Insurance Announces Life Insurance Underwriting Data Call and Survey Details

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09.08.2022

NCOIL Protests Insurers' Offers of Enhanced Cash Surrender Values

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09.08.2022

To Prevent Algorithms From Heading Off Course, Regulators Consider Testing

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07.12.2022

The Colorado Division of Insurance Continues to Navigate Life Insurer's Use of ECDIS and Algorithms

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07.05.2022

California Throws Shade at Insurance Industry's Use of Big Data and Algorithms

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05.11.2022

With Spring in the Air, States Renew Their Efforts to Allow Value-Added Products and Services

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05.11.2022

NAIC's Privacy Protections Working Group Plans Extended Growing Season for Fall 2023 Harvest

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05.11.2022

NAIC's New Cybersecurity Working Group Prepares for Planting

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05.11.2022

Flowers Sprout in the Consumer Data Regulation Garden

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05.11.2022

Coming Out of Winter Hibernation

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04.19.2022

The Picture Becomes Clearer as Colorado Holds Second Stakeholder Meeting

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03.24.2022

Colorado Division of Insurance Steps Up to the Plate for a Second Stakeholder Meeting

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02.28.2022

Regulators Hop One Step Forward, Two Steps Back on IUL Illustrations

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02.22.2022

Colorado Division of Insurance "Conducts" Its First Stakeholder Meeting

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01.28.2022

One More New Year's Party – Colorado's Stakeholder Process Begins

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01.11.2022

New Year, New Index-Linked Variable Annuity Actuarial Guideline?

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01.11.2022

Regulators Forecast Storm of Cybersecurity Activity

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01.11.2022

When Congress Freezes Up, the NAIC's Privacy Protections Working Group Lights a Fire

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01.11.2022

A Cold Blast From the Index Universal Life Illustration (A) Subgroup

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01.11.2022

Scrutiny of Algorithms and Consumer Data

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11.08.2021

Oregon DFR Invites Insurers to Discuss Ad Filing Requirements

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09.16.2021

Insurers Need to Do Their Homework: Review of the Use of Data, Algorithms, and Predictive Models

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09.16.2021

The NAIC's New E-Commerce Class

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09.16.2021

Diving Into IoT Data? Here Are Some Privacy Considerations

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09.16.2021

NAIC Illustration Work Stagnates in the Dog Days of Summer

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05.05.2021

Spring Is Hot for State Privacy Legislation

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05.05.2021

A Rocky Road Ahead for Insurers Using Consumer Data and Models

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05.05.2021

Cast Into the Deep: Questions for Charting New Privacy Waters

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05.05.2021

The Gift of Giving: States Move to Amend Their Anti-Rebating Laws

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05.05.2021

States Spring Into Action With Best Interest Rules for Annuities

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05.05.2021

Minimum Standard Nonforfeiture Rate – Green Light, Red Light

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12.15.2020

A New Dawning for Electronic Insurance and Investment Product Transactions and Document Delivery?

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12.15.2020

NAIC Rings in a New Year for Addressing Racial Inequities

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12.15.2020

NAIC Task Force Gives Insurers a Holiday Rebating Gift

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12.15.2020

NAIC Groups Adopt 2021 Charges

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12.15.2020

New Year, New Duties in the Sale of Annuities

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09.03.2020

Topsy-Turvy World of Accelerated Underwriting and Artificial Intelligence

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09.03.2020

NAIC Virtual Block Party

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09.03.2020

Not Quite Across the Suitability Finish Line

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09.03.2020

Back to School for Annuity and Life Disclosures and Illustrations

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09.03.2020

No Summer Break for the Rebating Drafting Group

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06.25.2020

Is It Time to Come Out and Play? New Rules Proposed on What Constitutes Rebating

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06.10.2020

Insurers' Successful Challenge to 2016 Amendments to Florida's Unclaimed Property Act Reversed on Appeal

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05.06.2020

NAIC Restarts Its Work Revising Its Model Privacy Provisions

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04.13.2020

Peering Into Regulators' Views on Artificial Intelligence

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04.13.2020

Spring Cleaning on the NAIC Model Privacy Laws

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04.13.2020

NAIC Tills the Accelerated Underwriting Garden

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02.14.2020

Suitability Model Crosses the Finish Line

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02.06.2020

Out of the Gate Fast

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02.06.2020

NAIC Life Insurance and Annuities (A) Committee Ends 2019 With a Big Bang

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02.06.2020

Round and Round – Will 2020 Bring the End to Inconsistent Anti-Rebating Prohibitions?

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02.06.2020

Life Insurance That Benefits the Living

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02.06.2020

Innovation and Technology at the NAIC 2019 Fall Meeting

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11.07.2019

Fixed and Fixed Indexed Annuities and Life Insurance Products

*The American Law Institute*

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10.04.2019

Tangled Web of Illustration Issues

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10.04.2019

Innovation Whack-a-Mole

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10.04.2019

Time to Flush Certain Restrictions on Rebates?

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08.07.2019

Annuity Suitability Working Group Tries to Get Out of the Parking Lot

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07.11.2019

Changes to the Index Product Illustration Requirements Are No Child's Play

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07.11.2019

Regulatory Response to Insurance Innovation

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07.11.2019

Unpacking the SEC's Regulation Best Interest Package

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07.11.2019

New Chair on the Block Discusses Reconstructing the Suitability Model

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04.04.2019

Financial Products: States Continue to Puzzle Together Standards and Required Disclosures for Professionals Selling or Providing Advice

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04.04.2019

Life Insurers Sinking in Quicksand as Regulators Scrutinize Non-Traditional Consumer Data Sources

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04.04.2019

NAIC Illustration Regulation Races Index Product Innovation

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01.29.2019

NY DFS Delivers an Icy Blast to Insurers Using External Data Sources and Algorithmic Underwriting

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12.18.2018

Various NAIC Groups Discuss a Cornucopia of Life and Annuity Topics

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11.26.2018

Is It Time to Harvest the NAIC Suitability in Annuity Transactions Model Regulation?

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10.25.2018

Suitability Working Group Stirs Ingredients for Suitability Model Potion

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10.09.2018

NAIC Big Data WG Shifts Its Gaze to the Use of Big Data in Life Insurance Underwriting

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10.01.2018

As Students Return to School, Regulators Continue Their Study of the NAIC's Suitability in Annuity Transaction Model Regulation

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10.01.2018

NAIC Summer National Meeting Spotlights Innovation and Insurtech

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07.20.2018

New York Issues Final Life Insurance and Annuity Suitability and Best Interests Regulation

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06.25.2018

Which Thoroughbred Will Win the Standards of Care Derby?

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03.31.2018

Another Bout in the NAIC Best Interest Standard Title Fight

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03.31.2018

State Suitability, Fiduciary Duty and Disclosure Initiatives Roundup

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03.31.2018

NAIC Disclosure Developments

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01.02.2018

New York Department of Financial Services Rings in the New Year With New Suitability Requirements for Insurance Companies

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12.29.2017

Did Santa Give the Insurance Industry a Lump of Coal or a Diamond in the Rough?

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12.29.2017

The Ghosts of Christmas Past, Present, and Future Haunt Insurers' Use of Big Data and Algorithmic Tools

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12.29.2017

The NAIC Says Aloha

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11.28.2017

New Model Regulation Gives Insurers Little to Be Thankful For

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07.05.2017

New York DFS Requests Information on Use of External Consumer Data and Information Sources in Life Insurance Underwriting

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04.10.2017

Sprouting Activity at the NAIC

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01.27.2017

NY DFS Issues Circular Letter Addressing Life Insurance Unfair Claims Settlement Practices During the Contestability Period

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12.21.2016

Remind Employees to Update Beneficiary Designations

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10.26.2016

CFPB's Project Catalyst Highlights Innovation Opportunities

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09.21.2016

UK's FCA Weighs in on Insurers' Use of Big Data

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07.26.2016

Time to Disrupt Insurance Regulation?

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04.13.2016

Florida Imposes Additional Unclaimed Property Requirements on Life Insurers

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01.27.2016

FTC's Big Data Report Provides Road Map for Insurers Using Big Data

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01.05.2016

Florida's OIR Provides Guidance on Annuity Maturity Date Extensions

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12.23.2015

California Passes Life and Annuity Electronic Transactions Law

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12.23.2015

NAIC Evaluates Insurer's Use of Variable Annuity Captives, Price Optimization, and Big Data

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12.15.2015

NAIC's Market Regulation Committee Adopts Broad Charge to Explore Insurers' Big Data Use

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12.03.2015

Will the UK's Scrutiny of Insurers' Use of Big Data Impact US Regulators?

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09.28.2015

Catching Up To Insurers' Use of Big Data

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06.17.2015

The First Step Toward Revising Life Insurance Illustration Requirements

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04.16.2015

Wake up Call for Regulators and Insurers

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03.24.2015

Georgia Provides Guidance on Variable Annuity Sales Disclosures

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02.11.2015

State Insurance Regulators Target Insurers' Responses to Cyber-Attacks

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12.31.2014

New Year, New Disclosures

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12.22.2014

Will Any Matters Addressed at the NAIC's 2014 Fall National Meeting Reach the Playoffs?

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12.17.2014

Minority Powerbrokers Q&A: Carlton Fields' Ann Black

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11.04.2014

Trick or Treat? Halloween Meeting of NAIC's Contingent Deferred Annuity Working Group

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10.08.2014

Florida Modifies Its Annuity Suitability Rule

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09.19.2014

Legislation Reforms California's Insurance Community Investment Program

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09.17.2014

Iowa Issues Bulletin on Index Annuity Marketing Materials

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09.16.2014

Insurer Sues Department of Insurance Over Multi-Million Dollar Penalty

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09.16.2014

The NAIC Considers a Stable of Issues at the Summer National Meeting

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09.08.2014

Florida Proposes Rule for Annuity and Life Insurance Surrender Disclosures

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07.08.2014

Rules Will Allow Issuance of Longevity Insurance in Retirement Plans

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03.31.2014

Spring Sprouts a Renewed Review by the NAIC

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02.10.2014

The NAIC Considers Whether a New Framework Should Apply to Innovative Annuity Products

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12.01.2013

New NAIC Charges and Recommendations

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12.01.2013

No Time for Hibernating This Winter: New Charges and Recommendations

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11.01.2013

Index Annuity and Life Product Trends and Issues

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09.11.2013

NAIC subgroup drafts proposed revision to suitability in annuity transactions model regulation

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09.01.2013

New Assignments Being Handed Out at the NAIC

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06.24.2013

Will Your Social Media Policies and Procedures Withstand Regulatory Scrutiny?

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06.01.2013

NAIC Life and Annuities (A) Committee's Round-Up

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04.22.2013

CFPB Issues Report on the Use of Senior Designations and Recommendations for Regulation

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04.05.2013

Iowa Leads the Way Issuing Guidance on Annuity Illustrations

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03.06.2013

SEC Seeks Cost/Benefit Data Relating to Standards of Conduct for Broker-Dealers and Investment Advisers

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03.01.2013

NAIC Reveals Annuity Products Game Plan for 2013

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01.09.2013

Draft Product Review and Recommendations Exposed for Comment

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12.21.2012

Holiday "Gift" from the NAIC Separate Account Risk Working Group

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12.01.2012

Insurance Regulators Hear Plea for Increased Supervision of Claim Review Tools

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09.01.2012

Summary of Unclaimed Property Settlements

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07.11.2012

Regulators Define Swaps

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06.01.2012

Update of NAIC Separate Account Initiatives

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03.27.2012

To Insulate or to Not Insulate

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03.23.2012

Connecticut Cost of Insurance Legislation Voted Out of Committee

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03.15.2012

Connecticut Legislative Committee Considers Proposed Legislation Regarding Cost of Insurance Increases

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11.28.2011

Model Unclaimed Life Insurance Benefits Act adopted by NCOIL

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11.02.2011

American Academy of Actuaries Issues a Letter in Support of Contingent Annuities

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10.31.2011

Florida Issues Notice Amending Proposed Annuity Cover Page Rule

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10.10.2011

New York State Insurance Department Provides Additional Guidance on its Directive to Conduct Social Security Death Index Sweeps

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09.01.2011

Retained Asset Account Initiatives

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08.04.2011

Revisions to Annuity Disclosure Model Adopted

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07.07.2011

The New York State Insurance Department Issues a Directive to Conduct Social Security Death Index Sweeps

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07.06.2011

Iowa Draws Line Between Insurance and Securities Advice

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06.01.2011

Suitability Wildfire

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05.27.2011

Unclaimed Property — A Changing Landscape for Insurers

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12.30.2010

Florida Withdraws Proposal on Unlawful Inducement Rules

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12.20.2010

NAIC Adopts Retained Asset Accounts Sample Bulletin

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12.06.2010

Legislative and Regulatory Efforts Continue on Retained Asset Accounts

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12.01.2010

NAIC Fall National Meeting Update

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11.12.2010

Florida Proposed Rule on Fixed and Variable Annuity Contract Cover Pages

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10.13.2010

NCOIL Committee and NAIC RAA Working Group Continue Work on Retained Asset Accounts

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10.12.2010

Florida Proposed Rule on Use of Certifications and Professional Designations

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10.06.2010

US District Court Denies Motion to Dismiss 'Parallel' Reinsurance Case

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09.29.2010

NCOIL, NAIC, and States Focus on Consumer Disclosures Regarding Retained Asset Accounts

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09.17.2010

NCOIL Committee Permits RAAs as Default Option with Prior Disclosure to Beneficiaries

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09.13.2010

NCOIL Call to Discuss its Proposed Model Retained Asset Accounts Legislation

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09.01.2010

Insurers May Use Retained Asset Accounts

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03.10.2010

Regulatory Guidance on the Suitability in Annuity Transactions Model Regulation

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03.08.2010

Florida Proposes Unlawful Inducement Rules

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12.23.2009

NAIC Developments Regarding the Suitability in Annuity Transactions Model Regulation

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11.24.2009

Conference Call Regarding November 16, 2009 Draft Changes to NAIC Suitability in Annuity Transactions Model Regulation

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11.19.2009

Florida Revises Effective Date for Annuity Suitability Rule and Forms

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11.18.2009

New Revisions to the NAIC Suitability in Annuity Transactions Model Regulation

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11.01.2009

State Regulation of Annuities and Insurance

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10.15.2009

Florida Suitability Rule Proposal Withstands Industry Challenge

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09.07.2009

State Suitability Initiatives

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09.01.2009

State Suitability Initiatives

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09.01.2009

NAIC Suitability in Annuity Transaction Model Regulation

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08.26.2009

Health Insurers' Use of Ingenix Database Being Investigated by Florida Office of Insurance Regulation

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08.21.2009

Florida Announces Notices of Change on Rule Proposal for Annuity Suitability Form and Disclosure Comparison Form

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07.07.2009

July 2, 2009 Revisions to NAIC Suitability in Annuity Transaction Model Regulation

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06.17.2009

Florida Public Hearing on Rule Proposal for Annuity Suitability and Replacement Rule Forms

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06.09.2009

Florida Hearing on Proposed Rule to Adopt Annuity Suitability Form and Disclosure Comparison Form

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06.01.2009

FL Proposes Rule to Adopt New Annuity Suitability Forms

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05.27.2009

Proposed Revisions to NAIC Suitability in Annuity Transactions Model Regulation

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05.21.2009

Florida Proposes Rule to Adopt Annuity Suitability Form and Disclosure Comparison Form

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03.16.2009

NAIC Addresses Annuity Suitability

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03.04.2009

New Form D Amendment Rules Pose Trap for Unwary

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09.01.2007

Suitability Issues on State Agendas

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09.01.2006

Annuity Roundup

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04.30.2006

Independent Marketing Organizations' Roundtable

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05.31.1997

Insurance Market Conduct Litigation: Recent Developments in Jurisdiction, Discovery and Merits Issues

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## News

03.04.2024

Carlton Fields, Ann Black Recognized in JD Supra 2024 Readers' Choice Awards

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02.29.2024

Thomson Reuters Names 12 Carlton Fields Attorneys to 2024 Stand-Out Lawyers

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04.21.2023

Thomson Reuters Names Eight Carlton Fields Attorneys to 2023 Stand-Out Lawyers

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03.17.2023

Think Advisor Interviews Ann Black: “What If the Index in an Indexed Annuity Goes Away?”

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03.06.2023

JD Supra Names Ann Black Top Author for Insurance

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01.24.2022

Insurers Grapple With Proxy Bias Problem in AI Use

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05.01.2020

Carlton Fields Recognized as 2020 Top Firm for Insurance for Third Consecutive Year

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03.27.2019

Carlton Fields Named Top Law Firm for Insurance

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10.15.2018

Big Data Starts to Draw Big Scrutiny From Regulators

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07.20.2018

Reaction to New York’s Best Interest Rule Reveals Industry Fissures

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01.12.2018

NY’s Suitability Rule Would Have Sweeping Impact on Life Insurers: Law Firm

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01.08.2018

4 Ways New York May Make DOL Look Like a Fiduciary Kitten

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08.03.2017

BTI Ranks Carlton Fields among Firms with Best Insurance Industry Client Relationships

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## Recognition

- *The Best Lawyers in America*, Insurance Law (2023–2024)
- Top Author, Insurance, *JD Supra* Readers' Choice Awards (2019–2020, 2023–2024)
- "Stand-Out Lawyers," Thomson Reuters (2022–2024)

## Professional & Community Involvement

- Association of Life Insurance Counsel
  - Chair, Securities Committee (2018–2019); Vice Chair (2017–2018)
- American Bar Association
- National Association of Fixed Annuities
  - Former Member of the Board and Secretary

## Speaking Engagements

- "Innovations in Life Insurance and State Insurance Regulatory Initiatives," ALI CLE Conference on Life Insurance Products, Washington, D.C. (November 2, 2023)
- Integrity Marketing Group LLC Compliance Summit (2023)
- "Innovations in Insurance Product Distribution and State Insurance Regulatory Initiatives," ALI CLE Conference on Life Insurance Products, Washington, D.C. (November 3–4, 2022)
- "Innovation in Insurance," Client Presentation (October 6, 2022)
- "Advertising Training Seminar," Client Presentation (September 22, 2022)
- "Training Seminar on Securities, Insurance, and Tax," Client Presentation (June 14, 15, 21 and 23, 2022)
- "State Insurance Regulation Impact on Innovation," ALI CLE Conference on Life Insurance Products, Washington, D.C. (November 4–5, 2021)
- "State Insurance Regulatory Developments," Carlton Fields (June 23, 2020)
- "Fixed and Fixed Indexed Annuities and Life Insurance Products," ALI CLE Conference on Life Insurance Products, Washington, D.C. (November 6–8, 2019)
- "Key Regulatory & Risk Management Issues to Watch in the Retirement Product Market," Insured Retirement Institute, Washington, D.C. (February 6, 2019)



- "NAIC 'A' Committee Initiatives and the Latest Innovations in the Design, Distribution, and Administration of Fixed and Fixed Indexed Annuities and Life Insurance Products," ALI CLE 36th Annual Advanced Conference on Life Insurance Company Products, Washington, D.C. (November 8, 2018)
- Pacific Life 2018 Educational Symposium (September 24–27, 2018)
- "Securities Investigation and Enforcement Actions and Insurance Product Sales to Investment Advisor Clients," 2018 ALIC Annual Meeting, Half Moon Bay, CA (May 7, 2018)
- "Navigating the Insurer's Duties and Bad Faith Considerations" and "Representations and Warranty Insurance – Lessons Learned," Client Forum, New York, NY (February 28, 2018)
- "Regulatory Trends in Financial Services," Carlton Fields In-House Counsel Forum, Orlando, FL (March 2017)
- "Big Data – Uses, Insurer Obligations, and Ethical Issues for In-House Counsel," New York, NY (February 8, 2017)
- "Innovative Fixed Rate and Indexed Annuity and Life Insurance Product Designs and Regulatory Developments," ALI CLE Life Insurance Company Products 2016, Washington, D.C. (November 3, 2016)
- "DOL Fiduciary Rule Implementation Workshop," IRI Government, Legal & Regulatory Conference 2016, Washington, D.C. (June 8, 2016)
- "Big Data – Practical Problems, Proposed Solutions, and Ethical Considerations," Client Focus Forum, Denver, CO (October 19, 2015)
- "Index Annuity and Life Product Trends and Issues," ALI CLE Conference on Life Insurance Company Products (November 2013)
- "Advanced Forum on Key Litigation and Regulatory Issues Impacting the Financial Services Industry" – Consumer Financial Protection Bureau Impact on Insurers; NAIC Review of Separate Account Funded Products; NAIC Review of Captives and Reserve Requirements for UL Policies with Secondary Guarantees and for Term Life Policies; NAIC ERISA Retirement Income Working Group (December 12, 2012)
- "Advanced Forum on Key Litigation and Regulatory Issues Impacting the Financial Services Industry" – State Securities Departments; Suitability – State and FINRA; Replacements; Tips for Conducting a Mock Regulatory Inspection; Consumer Financial Protection Bureau Impact on Insurers; Reinsurance Regulation – Captives and SPVs (October 23, 2012)
- "Advanced Forum on Key Litigation and Regulatory Issues Impacting the Financial Services Industry" – Unclaimed Property; Marketing and Disclosure Issues – Suitability; Annuity Disclosure Model Act and NAIC Disclosures Best Practices; Replacements; Consumer Financial Protection Bureau Impact on Insurers; Reinsurance Regulation (September 17, 2012)
- "State Regulation of Annuities and Insurance," ALI-ABA Conference on Life Insurance Company Products (November 2009)
- "Litigation Update," ACLI Compliance & Legal Sections Annual Meeting (July 2008)

- "What Not to Do When Developing Your Sales Programs: Recent Trends in Litigation and Compliance," American Bankers Insurance Association (September 2007)
- "Update on Evolving Litigation Issues Confronting Life Insurers: A Look Over the Shoulder as a Precursor of Things to Come," American Council of Life Insurers Conference (July 2006)
- "Independent Marketing Organizations' Roundtable," Sun Life Financial Distributors Inc. (June 2005)

## Credentials

### Education

- University of Florida College of Law (J.D., with honors, 1991)
  - Order of the Coif
- University of Florida (M.S., with honors, 1990)
- University of Florida (B.S., with honors, 1987)

### Bar Admissions

- Florida

## Background

- Former Certified Public Accountant