

**COMMENTS ON NAIC DRAFT ANTIFRAUD PLAN GUIDELINES
RECEIVED 12-19-2008 FROM WAYNE DELO, CIFI**

Good Afternoon Keri:

I just saw the model posted on the website. Excellent! There needs to be a rally because I believe the time is ripe for a push to implement such plans across the Country.

Michigan adopted a similar plan several years ago with a sunset clause that long since expired. Frankly there were many shingles held out there claiming SIU's were in place however there was little to no reporting required essentially because Michigan did not have a fraud bureau. Today less than 10% of the company's doing business here have an SIU.

Members of the Insurance Institute of Michigan worked recently on drafting a proposal laying out what a fraud bureau should look like, act like, who should fund it and how it should be ran. It seems to have unfortunately suffered a quiet death.

No one today has avoided the affects of fraud. Faud in one form or another is responsible for the economic condition we face today. Frankly it's dimensions reach far beyond the control of insurance company's but they provide an excellent environment to begin an assault.

How does one man defraud smart people out of FIFTY BILLION Dollars? Where did he get his beginning and why did he think he could get away with it? Moreover he had to believe crime pays! Why? Because time after time society has proven him and others like him right by and through our acceptance. Accountability for such acts are a laughing stock. We are now faced with what remains after a fraud assault of unimagivable proportions has nearly destroyed our economy leaving us with; a lack of trust in Government, in the stock market, our lending institutions, insurance companies, the auto industry, health care and the list goes on!

We only pay attention to the masked gunman who robs the local gas station, bank or party store. I am willing to bet if you added up all the money stolen at gunpoint in this nation since our birth and stacked it up next to the 50 billion one man stole "without a gun" the pile would be invisible by comparison.

I am probably preaching to the Choir so I won't bore you anymore.

Have a great day!

Wayne Delo CIFI

"All fraud needs to triumph is for good people to do nothing"