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GALLAGHER ARTHUR J & CO Form IRANNOTICE February 13, 2017

February 10, 2017

U.S. Securities and Exchange Commission

100 F Street, N.E.

Washington, DC 20549

Re: Notice of disclosure filed in Exchange Act Annual Report under Section 219 of the Iran Threat Reduction and Syria Human Rights Act of 2012 and Section 13(r) of the Exchange Act Ladies and Gentlemen:

Pursuant to Section 219 of the Iran Threat Reduction and Syria Human Rights Act of 2012 and Section 13(r) of the Securities Exchange Act of 1934, as amended, notice is hereby provided that Arthur J. Gallagher & Co. has made disclosure pursuant to those provisions in its Annual Report on Form 10-K for the year ended December 31, 2016, which was filed with the U.S. Securities and Exchange Commission on February 10, 2017.

Respectfully submitted,

Arthur J. Gallagher & Co.

/s/ Walter D. Bay Walter D. Bay Vice President, General Counsel and Secretary