
B. In August of 2022 the division performed a routine internal audit of EDWARD JACOBS \& CO. The audit revealed that EDWARD JACOBS \& CO sold policies in Alaska prior to being licensed in November 2022.
C. On August 22, 2022, the division sent notice to EDWARD JACOBS \& CO informing of them the division's audit revealed policies posted before initial licensure. This notice requested a business transaction form verifying any additional business that may have been placed prior to licensure in the state of Alaska.
D. On September 2, 2022, the firm supplied a business transaction form indicating EDWARD JACOBS \& CO sold five policies in Alaska prior to licensure in the state of Alaska, totaling $\$ 3,399$ in commissions received. These transactions were in violation of AS 21.27.010 and subject EDWARD JONES \& CO to civil penalties under AS 21.27.440.

## II. TERMS OF AGREEMENT

A. EDWARD JACOBS \& CO agrees to pay a civil penalty under AS 21.27.440 in the amount of $\$ 3,399$ for the unlicensed activity that occurred prior to the issuance of the firm license with $\$ 1,699$ suspended. The unsuspended penalty of $\$ 1,700$ is payable within 30 days from the time EDWARD JACOBS \& CO has been notified that the director has signed the order approving this agreement.
B. In the event EDWARD JACOBS \& CO violates Alaska insurance laws during the next year, the suspended portion of the penalty referenced in section II. A. will be reinstated. EDWARD JACOBS \& CO will also be subject to any and all
sanctions authorized by the insurance laws including imposition of additional penalties.
C. By signing this agreement, EDWARD JACOBS \& CO understands and agrees that any failure to comply with the conditions of this agreement will be grounds to revoke, suspend, or not renew Alaska firm license 3002238101.
D. EDWARD JACOBS \& CO understands that this agreement is not binding on the parties unless and until the director signs the order approving the agreement.

DATED:


Approved as to form and content:
DATED: December 9, 2022

By: /sIP. Susan Mitchell<br>Susan Mitchell<br>Assistant Attorney General

## ORDER

IT IS FURTHER ORDERED that this Stipulated Agreement and Order is adopted in full resolution of the civil liability issues between the parties to this agreement in these cases and shall constitute the final order in these matters.

DATED this $\underline{g}^{\text {th }}$ day of Dec. , 2022.


Lori K. Wing-Heier
Director, Division of Insurance

