

LAWRENCE G. WASDEN  
Attorney General

JOHN C. KEENAN  
I.S.B. No. 3873  
Deputy Attorney General  
State of Idaho  
Department of Insurance  
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P.O. Box 83720  
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[john.keenan@doi.idaho.gov](mailto:john.keenan@doi.idaho.gov)

**FILED**   
**AUG 16 2022**  
Department of Insurance  
State of Idaho

*Attorneys for the Department of Insurance*

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE**

**STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

AARON REID ANDREW, holding Idaho  
Nonresident Producer No. 298239,

Respondent.

Docket No. 18-4077-22

**ORDER SETTING ASIDE ORDERS  
OF DEFAULT REVOKING IDAHO  
NONRESIDENT PRODUCER  
LICENSE OF AARON REID  
ANDREW**

On July 11, 2022, the Director of the Idaho Department of Insurance (“Director”) entered an *Order of Default Revoking Idaho Nonresident Producer License of Aaron Reid Andrew*. On July 28, 2022, the Department filed a *(Corrected) Order of Default Revoking Nonresident Producer License of Aaron Reid Andrew* (“Orders of Default”). See Exhibits “1” and “2”.

The Director having reviewed the foregoing and the requirements of Idaho § 41-232(5), finds that good cause exists to set aside the July 11, 2022, and the July 28, 2022, Orders of Default, and allow this matter to proceed on the merits. Based on this finding, and good cause appearing;

**ORDER SETTING ASIDE ORDERS OF DEFAULT REVOKING IDAHO RESIDENT  
PRODUCER LICENSE OF AARON REID ANDREW – Page 1**

IT IS HEREBY ORDERED that the *Orders of Default Revoking Idaho Nonresident Producer License of Aaron Reid Andrew* entered on July 11, 2022, and July 28, 2022, are VACATED and set aside so that a hearing on the merits can be scheduled.

IT IS FURTHER ORDERED that in compliance with Idaho Code § 41-1008(6) , Andrew shall immediately provide the Department with complete and current contact information including his residential and business mailing addresses, current telephone numbers and email addresses. Andrew shall also update any changes to his contact information with the Department within thirty (30) days of any changes as required by law.

DATED this 15<sup>th</sup> day of August, 2022.

STATE OF IDAHO,  
DEPARTMENT OF INSURANCE



DEAN L. CAMERON  
Director

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16<sup>th</sup> day of August, 2022, I caused a true and correct copy of the foregoing ORDER SETTING ASIDE ORDERS OF DEFAULT REVOKING IDAHO NONRESIDENT PRODUCER LICENSE OF AARON REID ANDREW to be served upon the following by the designated means:

Timothy Dance 9800 S. Monroe, Suite 809 Sandy, UT 84070  <i>Counsel for Respondent Aaron Reid Andrew</i>	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:timothy.dance@gmail.com">timothy.dance@gmail.com</a>
Brennan H. Moss ARMSTRONG TEASDALE, LLP 201 S. Main, Suite 750 Salt Lake City, UT 84111  <i>Counsel for Respondent Aaron Reid Andrew</i>	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:bmoss@aatllp.com">bmoss@aatllp.com</a>
John Keenan Deputy Attorney General Idaho Department of Insurance 700 W. State St., 3 <sup>rd</sup> Floor Boise, ID 83720-0043	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:john.keenan@doi.idaho.gov">john.keenan@doi.idaho.gov</a>

  
\_\_\_\_\_  
Penny Wilcox

LAWRENCE G. WASDEN  
Idaho Attorney General

JOHN C. KEENAN, ISB No. 3873  
Deputy Attorney General  
Idaho Department of Insurance  
700 W. State St.  
PO Box 83720  
Boise, Idaho 83720-0043  
Telephone No. (208) 334-4219  
Facsimile No. (208) 334-4298  
[john.keenan@doi.idaho.gov](mailto:john.keenan@doi.idaho.gov)

**FILED**  
**JUL 11 2022**  
Department of Insurance  
State of Idaho

*Attorneys for Idaho Department of Insurance*

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE**  
**STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

AARON REID ANDREW, holding Idaho Non-Resident Producer No. 298239; MARCUS KENT MAXFIELD, with inactive Idaho Non-Resident Producer License No. 464329; and JEREMY ALMA ANDREW, with inactive Idaho Non-Resident Producer License No. 602329,

Respondents.

Docket No. 18-4077-22

**ORDER OF DEFAULT REVOKING  
NONRESIDENT PRODUCER  
LICENSE OF AARON REID  
ANDREW**

The Director of the Idaho Department of Insurance ("Director") having reviewed the record herein; and Respondent, Aaron Reid Andrew ("Andrew"), having been lawfully served the *Verified Complaint and Notice of Right to Hearing* ("Complaint"), a copy of which is attached hereto as Exhibit "A", and Andrew having failed to submit a written request for hearing or address

**ORDER OF DEFAULT REVOKING NONRESIDENT PRODUCER LICENSE OF  
AARON REID ANDREW - 1**

**EXHIBIT**

**1**

the allegations, violations and charges set forth in the Complaint, and the Director finding as a result thereof that Andrew has waived his rights regarding the opportunity for hearing; and in consideration of the above, and good cause appearing,

The Director finds that Andrew has violated the laws of the state of Idaho, to wit, section 41-1016(1)(h), Idaho Code, when using fraudulent or dishonest practices, for demonstrating incompetence, untrustworthiness, or financial irresponsibility, or being a course of injury and loss to the public or others, in the conduct of business in the state of Idaho; when Andrew was acting, contrary to Idaho law, as an investment advisor and offering and selling securities to Idaho consumers when he was not licensed to sell securities, and when Andrew was not properly registered as an investment advisor. Andrew also violated the laws of the state of Idaho, to wit, section 41-1021, Idaho Code, when he failed to report to the Department that an *Order to Cease and Desist* was entered against him by the Idaho Department of Finance.

THEREFORE, IT IS ORDERED that Idaho Nonresident Producer License No. 298239 issued to Andrew is hereby revoked and that Andrew shall not be eligible to apply for or receive any license under title 41, Idaho Code, for a period of five (5) years.

IT IS FURTHER ORDERED that after expiration of the five-year revocation period, in accordance with section 41-1026(3), Idaho Code, in the event that Andrew files an application for any license under title 41, Idaho Code, Andrew must petition and show good cause why the prior revocation shall not be deemed a bar to the issuance of a new license.

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IT IS FURTHER ORDERED that an administrative penalty of \$5,000 is imposed against Andrew for violations of sections 41-1016(1)(h) and 41-1021(1), Idaho Code.

DATED this 7<sup>th</sup> day of July, 2022.

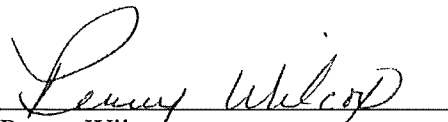
STATE OF IDAHO  
DEPARTMENT OF INSURANCE

  
\_\_\_\_\_  
DEAN L. CAMERON, Director

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this 11<sup>th</sup> day of July, 2022, caused a true and correct copy of the foregoing ORDER OF DEFAULT REVOKING NONRESIDENT PRODUCER LICENSE OF AARON REID ANDREW to be served upon the following parties by the designated means:

Aaron R. Andrew 2285 New Baldwin Lane Holladay, UT 84117-5022	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:aaron@laserfinancial.com">aaron@laserfinancial.com</a>
John C. Keenan Deputy Attorney General Idaho Department of Insurance 700 W. State St., 3 <sup>rd</sup> Floor PO Box 83720 Boise, ID 83720-0043	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:john.keenan@doi.idaho.gov">john.keenan@doi.idaho.gov</a>
<i>Courtesy Copies:</i>  Randy Pipal Bureau Chief, Consumer Services  Eric Fletcher Bureau Chief, Company Activities  Lori Thomason Licensing Supervisor	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:randy.pipal@doi.idaho.gov">randy.pipal@doi.idaho.gov</a> <a href="mailto:eric.fletcher@doi.idaho.gov">eric.fletcher@doi.idaho.gov</a> <a href="mailto:lori.thomason@doi.idaho.gov">lori.thomason@doi.idaho.gov</a>

  
Penny Wilcox

LAWRENCE G. WASDEN  
Attorney General

JOHN C. KEENAN  
Deputy Attorney General  
State of Idaho  
Department of Insurance  
700 W. State Street, 3<sup>rd</sup> Floor  
P.O. Box 83720  
Boise, Idaho 83720-0043  
Telephone: (208) 334-4283  
Facsimile: (208) 334-4298  
[john.keenan@doi.idaho.gov](mailto:john.keenan@doi.idaho.gov)  
I.S.B. No. 3873

*Attorneys for the Department of Insurance*

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE**

**STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

AARON REID ANDREW, holding Idaho  
Non-Resident Producer No. 298239; MARCUS  
KENT MAXFIELD, with inactive Idaho Non-  
Resident Producer License No. 464329; and  
JEREMY ALMA WATSON, with inactive  
Idaho Non-Resident Producer License No.  
602329;

Respondents.

Docket No. 18-4077-22

**VERIFIED COMPLAINT  
AND NOTICE OF RIGHT TO  
HEARING**

The Idaho Department of Insurance ("Department"), by and through its attorney of record,  
John C. Keenan, Deputy Attorney General, does hereby complain and allege as follows:

1. The Director of the Department ("Director") has jurisdiction in the state of Idaho  
over matters involving insurance regulation and licensing, in accordance with title 41, Idaho Code.



2. This administrative proceeding is brought under the provisions of the Idaho Insurance Code, Idaho Code § 41-101 *et seq.*, including but not limited to Idaho Code § 41-213, which authorizes the Department to initiate a contested case against an insurer, wherein the Director may, after an opportunity for a hearing, impose a penalty under Idaho Code § 41-117 and may take action against a producer's license, if he finds that the producer has violated or failed to comply with any lawful order of the director, or relevant provision of title 41, Idaho Code.

### RESPONDENTS

3. AARON REID ANDREW ("Andrew") is a resident of the state of Utah and holds an Idaho Non-Resident Producer License No. 298239, which is active and was originally issued on October 6, 2008.

4. MARCUS KENT MAXFIELD ("Maxfield") is a resident of the state of Utah and holds an Idaho Non-Resident Producer License No. 464329, which is inactive as of March 31, 2022, and was originally issued on October 15, 2013.

5. JEREMY ALMA WATSON ("Watson") is a resident of the state of Utah and holds an Idaho Non-Resident Producer License No. 602329, which is presently inactive as of November 30, 2018. Watson was originally issued a non-resident producer license on January 13, 2017,

### JURISDICTION

6. Jurisdiction in this matter is founded in the Idaho Insurance Code, Idaho Code § 41-101 *et seq.*, including Idaho Code § 41-210, which authorizes the Director of the Department of Insurance ("Director") to enforce the provisions of title 41 of the Idaho Code, including those governing Respondent's activities as an insurance producer.

7. Jurisdiction is further founded in Idaho Code § 41-213, which authorizes the Department to institute such proceedings as deemed necessary for the enforcement of any provision of the Idaho Insurance Code including, but not limited to, license revocation and the imposition of

administrative penalties.

8. Section 41-1016(1), Idaho Code, provides that the Director may suspend, revoke or refuse to issue or renew a producer's license and may impose an administrative penalty up to one thousand dollars (\$1,000), if the Director finds that any of the causes or violations set forth in subsections 41-1016(1)(a) through (o) exist, including specifically subsection (h) which prohibits:

(h) Using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss to the public or others, in the conduct of business in [Idaho] or elsewhere.

9. Section 41-1016(5), Idaho Code, provides that the shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by title 41, Idaho Code, against any person who is under investigation for or charged with a violation of title 41, Idaho Code, or department rule, even if the person's license or registration has been surrendered or has lapsed by operation of law, or if the person has never been licensed.

10. Section 41-1021(1), Idaho Code, provides in relevant part that:

A producer shall report to the director any administrative action taken against the producer in another jurisdiction or by another governmental agency within thirty (30) days of the final disposition of the matter. This report shall include a copy of the order, consent order or other relevant legal documents.

10. Section 41-1026(3), Idaho Code, states the Director shall not issue a license under title 41, Idaho Code, to any person whose license has been revoked until after the expiration of not less than one (1) year to a maximum of five (5) years and, upon a former licensee's application for re-licensure, the Director may require the former licensee "to show good cause why the prior revocation ... shall not be deemed a bar to the issuance of a new license."

11. Section 41-117, Idaho Code, provides that each instance of violation may be considered a separate offense.

#### FACTUAL ALLEGATIONS

12. On July 22, 2021, the Idaho Department of Finance issued an *Order to Cease and Desist* against, among others, the Respondents Andrew, Maxfield, and Watson, ordering therein, that;;

The Respondents shall CEASE AND DESIST from violations of the Idaho Uniform Securities Act (2004), . . . to include: offering or selling unregistered securities to Idaho residents; selling securities as an unregistered broker-dealer or agent; associating with unregistered agents in the selling of securities; and engaging in securities fraud (by failing to disclose material facts in connection with the offer or sale of securities to Idaho residents.”

13. The *Order to Cease and Desist* issued against the named Respondents, gave notice to the Respondents of the right to contest and the right to hearing with regard to the *Order to Cease and Desist*, the right to appeal, and the right to file a request for reconsideration.

14. As of the undersigned date, the July 22, 2021 *Order to Cease and Desist* is a final Order of the Idaho Department of Finance.

#### COUNT I

15. Paragraphs 1 through 14 are re-alleged as if fully set forth herein.

16. As to Respondent Andrew, the *Order to Cease and Desist* found that Andrew, in or about February 2016, acted as an investment advisor and offered and sold securities to one (1) Idaho consumer for consideration of a commission in the sum of \$4,485.00; during which time Andrew was not licensed to sell securities, nor was he registered as an investment advisor.

17. The *Order to Cease and Desist* also found that Andrew failed to disclose to the Idaho consumer that the investments he sold were not registered as securities as required by law.

18. Andrew violated section 41-1016(1)(h), Idaho Code, on two (2) occasions as alleged above, for his fraudulent or dishonest practices, for demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss to the public or others, in the conduct of business in Idaho or elsewhere.

19. To date, Andrew failed to report the Idaho Department of Finance *Order to Cease and Desist* action against Andrew to the Idaho Department of Insurance as required by law.

License No. 602329, providing that JEREMY ALMA WATSON shall not be issued any license under title 41, Idaho Code, for a period of five (5) years;


8. For an Order that, after expiration of the five-year revocation period, in accordance with section 41-1026(3), Idaho Code, in the event JEREMY ALMA WATSON files an application for any license under title 41, Idaho Code, JEREMY ALMA WATSON must petition and show good cause why the prior revocation should not be deemed a bar to the issuance of a new license:

9. For an Order imposing an administrative penalty against JEREMY ALMA WATSON in an amount to be proven at hearing, but in the event of a default, an amount not less than Five Thousand Dollars (\$5,000), which represents \$1,000 per violation as alleged hereinabove;

10. For such other and further relief as the Director deems just and necessary under the circumstances.

DATED this 15 day of <sup>April</sup>~~March~~, 2022.

STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL

  
JOHN C. KEENAN  
Deputy Attorney General

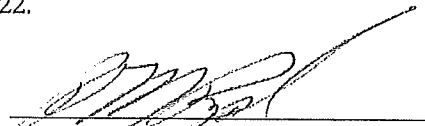
VERIFICATION

State of Idaho )  
: ss.  
County of Ada )

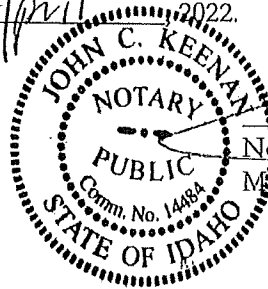
RANDALL PIPAL, Consumer Affairs Bureau Chief, Department of Insurance, State of Idaho, being first duly sworn, deposes and says:

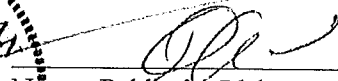
I have read the foregoing Complaint and know the contents thereof and the same are true to the best of my knowledge and belief.

Dated this 15 day of April, 2022.

  
RANDALL PIPAL

SUBSCRIBED AND SWORN to before me, the undersigned Notary Public for the state of Idaho, this 15 day of April, 2022.



  
Notary Public for Idaho  
My Commission Expires Nov 12, 2025

## NOTICE OF RIGHT TO A HEARING

TO: AARON REID ANDREW,  
MARCUS KENT MAXFIELD, and  
JEREMY ALMA WATSON:

You are hereby notified that, pursuant to Idaho Code § 41-232A(2), a written request for a hearing must be filed and served upon the Department within twenty-one (21) days after service of this Complaint. Failure to file and serve a written request for a hearing upon the Department within the twenty-one (21) day time period shall be deemed a waiver of the opportunity for a hearing and to contest the allegations in the Complaint, pursuant to Idaho Code § 41-232A(2).

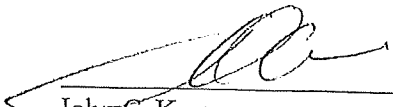
Any written request for a hearing shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director  
Idaho Department of Insurance  
P.O. Box 83720  
Boise, ID 83720-0043

A copy shall also be provided to the Department's counsel in this matter, John C. Keenan, Deputy Attorney General, at the following address:

John C. Keenan  
Deputy Attorney General  
Idaho Department of Insurance  
P.O. Box 83720  
Boise, ID 83720-0043

In lieu of holding a hearing, this matter may be resolved by negotiation, stipulation, agreed settlement, or consent order, pursuant to Idaho Code § 67-5241. Should you wish to discuss this matter, please contact the undersigned deputy attorney general.

  
John C. Keenan

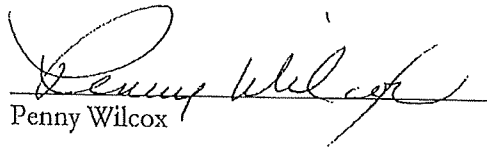
### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18 day of April, 2022, I caused a true and correct copy of the foregoing VERIFIED COMPLAINT AND NOTICE OF RIGHT TO HEARING to be served upon the following parties by the designated means:

Aaron R. Andrew PARAMOUNT FINANCIAL SERVICES 6340 S. 3000 E. Ste. 280 Salt Lake City, UT 84121-3561	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:
Jeremy Watson LIVE ABUNDANT 6340 S. 3000 E. Ste 280 Salt Lake City, UT 84121-3561	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:
Jeremy Watson 2197 E. High Mesa Drive Sandy, UT 84092-5542	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:
Marcus Maxfield PARAMOUNT FINANCIAL SERVICES 6340 S. 3000 E. Ste. 280 Salt Lake City, UT 84121-3561	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:
Karl T. Klein Deputy Attorney General Idaho Department of Insurance 700 W. State St., 3 <sup>rd</sup> Floor Boise, ID 83720-0043	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:karl.klein@doi.idaho.gov">karl.klein@doi.idaho.gov</a>

(Con't)

<p><i>Courtesy Copies</i></p> <p>Randy Pipal Bureau Chief, Consumer Services</p> <p>Eric Fletcher Bureau Chief, Company Activities Idaho Department of Insurance 700 W. State St., 3<sup>rd</sup> Floor Boise, ID 83720-0043</p>	<p><input type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified Mail</p> <p><input type="checkbox"/> Hand Delivery</p> <p><input type="checkbox"/> Facsimile</p> <p><input checked="" type="checkbox"/> Email: <a href="mailto:randy.pipal@doi.idaho.gov">randy.pipal@doi.idaho.gov</a> <a href="mailto:eric.fletcher@doi.idaho.gov">eric.fletcher@doi.idaho.gov</a></p>
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Penny Wilcox





LAWRENCE G. WASDEN  
Idaho Attorney General

JOHN C. KEENAN, ISB No. 3873  
Deputy Attorney General  
Idaho Department of Insurance  
700 W. State St.  
PO Box 83720  
Boise, Idaho 83720-0043  
Telephone No. (208) 334-4219  
Facsimile No. (208) 334-4298  
[john.keenan@doi.idaho.gov](mailto:john.keenan@doi.idaho.gov)

FILED  
JUL 28 2022  
*Corrected Order*  
Department of Insurance  
State of Idaho

*Attorneys for Idaho Department of Insurance*

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE**

**STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

AARON REID ANDREW, holding Idaho Non-Resident Producer No. 298239; MARCUS KENT MAXFIELD, with inactive Idaho Non-Resident Producer License No. 464329; and JEREMY ALMA WATSON, with inactive Idaho Non-Resident Producer License No. 602329,

Respondents.

Docket No. 18-4077-22

**(Corrected)**  
**ORDER OF DEFAULT REVOKING**  
**NONRESIDENT PRODUCER**  
**LICENSE OF AARON REID**  
**ANDREW**

The Director of the Idaho Department of Insurance ("Director") having reviewed the record herein; and Respondent, Aaron Reid Andrew ("Andrew"), having been lawfully served the *Verified Complaint and Notice of Right to Hearing* ("Complaint"), a copy of which is attached hereto as Exhibit "A", and Andrew having failed to submit a written request for hearing or address

**ORDER OF DEFAULT REVOKING NONRESIDENT PRODUCER LICENSE OF**  
**AARON REID ANDREW - 1**

**EXHIBIT**

2

exhibitdecor.com

the allegations, violations and charges set forth in the Complaint, and the Director finding as a result thereof that Andrew has waived his rights regarding the opportunity for hearing; and in consideration of the above, and good cause appearing,

The Director finds that Andrew has violated the laws of the state of Idaho, to wit, section 41-1016(1)(h), Idaho Code, when using fraudulent or dishonest practices, for demonstrating incompetence, untrustworthiness, or financial irresponsibility, or being a course of injury and loss to the public or others, in the conduct of business in the state of Idaho; when Andrew was acting, contrary to Idaho law, as an investment advisor and offering and selling securities to Idaho consumers when he was not licensed to sell securities, and when Andrew was not properly registered as an investment advisor. Andrew also violated the laws of the state of Idaho, to wit, section 41-1021, Idaho Code, when he failed to report to the Department that an *Order to Cease and Desist* was entered against him by the Idaho Department of Finance.

THEREFORE, IT IS ORDERED that Idaho Nonresident Producer License No. 298239 issued to Andrew is hereby revoked and that Andrew shall not be eligible to apply for or receive any license under title 41, Idaho Code, for a period of five (5) years.

IT IS FURTHER ORDERED that after expiration of the five-year revocation period, in accordance with section 41-1026(3), Idaho Code, in the event that Andrew files an application for any license under title 41, Idaho Code, Andrew must petition and show good cause why the prior revocation shall not be deemed a bar to the issuance of a new license.

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///

IT IS FURTHER ORDERED that an administrative penalty of \$5,000 is imposed against Andrew for violations of sections 41-1016(1)(h) and 41-1021(1), Idaho Code.

DATED this 7<sup>th</sup> day of July, 2022.

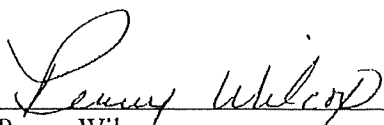
STATE OF IDAHO  
DEPARTMENT OF INSURANCE

  
\_\_\_\_\_  
DEAN L. CAMERON, Director

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this 11<sup>th</sup> day of July, 2022, caused a true and correct copy of the foregoing ORDER OF DEFAULT REVOKING NONRESIDENT PRODUCER LICENSE OF AARON REID ANDREW to be served upon the following parties by the designated means:

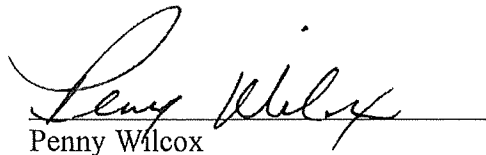
Aaron R. Andrew 2285 New Baldwin Lane Holladay, UT 84117-5022	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:aaron@laserfinancial.com">aaron@laserfinancial.com</a>
John C. Keenan Deputy Attorney General Idaho Department of Insurance 700 W. State St., 3 <sup>rd</sup> Floor PO Box 83720 Boise, ID 83720-0043	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:john.keenan@doi.idaho.gov">john.keenan@doi.idaho.gov</a>
<i>Courtesy Copies:</i>  Randy Pipal Bureau Chief, Consumer Services  Eric Fletcher Bureau Chief, Company Activities  Lori Thomason Licensing Supervisor	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:randy.pipal@doi.idaho.gov">randy.pipal@doi.idaho.gov</a> <a href="mailto:eric.fletcher@doi.idaho.gov">eric.fletcher@doi.idaho.gov</a> <a href="mailto:lori.thomason@doi.idaho.gov">lori.thomason@doi.idaho.gov</a>

  
Penny Wilcox

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have on this 28th day of July, 2022, caused a true and correct copy of the foregoing (Corrected) ORDER OF DEFAULT REVOKING NONRESIDENT PRODUCER LICENSE OF AARON REID ANDREW to be served upon the following parties by the designated means:

Timothy Dance 1275 E. Fort Union Blvd. #210 Cottonwood Heights, UT 84047  <i>Counsel for Respondent</i>	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:timothy.dance@gmail.com">timothy.dance@gmail.com</a>
Brennan H. Moss ARMSTRONG TEASDALE, LLP 201 S. Main, Suite 750 Salt Lake City, UT 84111  <i>Counsel for Respondent</i>	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:bmoss@atl1p.com">bmoss@atl1p.com</a>
John C. Keenan Deputy Attorney General Idaho Department of Insurance 700 W. State St., 3 <sup>rd</sup> Floor PO Box 83720 Boise, ID 83720-0043  <i>Counsel for Idaho Department of Insurance</i>	<input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <a href="mailto:john.keenan@doi.idaho.gov">john.keenan@doi.idaho.gov</a>

  
Penny Wilcox

LAWRENCE G. WASDEN  
Attorney General

JOHN C. KEENAN  
Deputy Attorney General  
State of Idaho  
Department of Insurance  
700 W. State Street, 3<sup>rd</sup> Floor  
P.O. Box 83720  
Boise, Idaho 83720-0043  
Telephone: (208) 334-4283  
Facsimile: (208) 334-4298  
[john.keenan@doi.idaho.gov](mailto:john.keenan@doi.idaho.gov)  
I.S.B. No. 3873

*Attorneys for the Department of Insurance*

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE**

**STATE OF IDAHO**

IDAHO DEPARTMENT OF INSURANCE,

Complainant,

vs.

AARON REID ANDREW, holding Idaho  
Non-Resident Producer No. 298239; MARCUS  
KENT MAXFIELD, with inactive Idaho Non-  
Resident Producer License No. 464329; and  
JEREMY ALMA WATSON, with inactive  
Idaho Non-Resident Producer License No.  
602329;

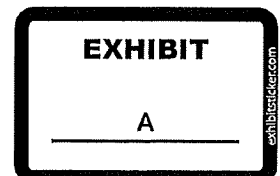
Respondents.

Docket No. 18-4077-22

**VERIFIED COMPLAINT  
AND NOTICE OF RIGHT TO  
HEARING**

The Idaho Department of Insurance ("Department"), by and through its attorney of record,  
John C. Keenan, Deputy Attorney General, does hereby complain and allege as follows:

1. The Director of the Department ("Director") has jurisdiction in the state of Idaho  
over matters involving insurance regulation and licensing, in accordance with title 41, Idaho Code.



2. This administrative proceeding is brought under the provisions of the Idaho Insurance Code, Idaho Code § 41-101 *et seq.*, including but not limited to Idaho Code § 41-213, which authorizes the Department to initiate a contested case against an insurer, wherein the Director may, after an opportunity for a hearing, impose a penalty under Idaho Code § 41-117 and may take action against a producer's license, if he finds that the producer has violated or failed to comply with any lawful order of the director, or relevant provision of title 41, Idaho Code.

### RESPONDENTS

3. AARON REID ANDREW ("Andrew") is a resident of the state of Utah and holds an Idaho Non-Resident Producer License No. 298239, which is active and was originally issued on October 6, 2008.

4. MARCUS KENT MAXFIELD ("Maxfield") is a resident of the state of Utah and holds an Idaho Non-Resident Producer License No. 464329, which is inactive as of March 31, 2022, and was originally issued on October 15, 2013.

5. JEREMY ALMA WATSON ("Watson") is a resident of the state of Utah and holds an Idaho Non-Resident Producer License No. 602329, which is presently inactive as of November 30, 2018. Watson was originally issued a non-resident producer license on January 13, 2017,

### JURISDICTION

6. Jurisdiction in this matter is founded in the Idaho Insurance Code, Idaho Code § 41-101 *et seq.*, including Idaho Code § 41-210, which authorizes the Director of the Department of Insurance ("Director") to enforce the provisions of title 41 of the Idaho Code, including those governing Respondent's activities as an insurance producer.

7. Jurisdiction is further founded in Idaho Code § 41-213, which authorizes the Department to institute such proceedings as deemed necessary for the enforcement of any provision of the Idaho Insurance Code including, but not limited to, license revocation and the imposition of



administrative penalties.

8. Section 41-1016(1), Idaho Code, provides that the Director may suspend, revoke or refuse to issue or renew a producer's license and may impose an administrative penalty up to one thousand dollars (\$1,000), if the Director finds that any of the causes or violations set forth in subsections 41-1016(1)(a) through (o) exist, including specifically subsection (h) which prohibits:

(h) Using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss to the public or others, in the conduct of business in [Idaho] or elsewhere.

9. Section 41-1016(5), Idaho Code, provides that the shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by title 41, Idaho Code, against any person who is under investigation for or charged with a violation of title 41, Idaho Code, or department rule, even if the person's license or registration has been surrendered or has lapsed by operation of law, or if the person has never been licensed.

10. Section 41-1021(1), Idaho Code, provides in relevant part that:

A producer shall report to the director any administrative action taken against the producer in another jurisdiction or by another governmental agency within thirty (30) days of the final disposition of the matter. This report shall include a copy of the order, consent order or other relevant legal documents.

10. Section 41-1026(3), Idaho Code, states the Director shall not issue a license under title 41, Idaho Code, to any person whose license has been revoked until after the expiration of not less than one (1) year to a maximum of five (5) years and, upon a former licensee's application for re-licensure, the Director may require the former licensee "to show good cause why the prior revocation ... shall not be deemed a bar to the issuance of a new license."

11. Section 41-117, Idaho Code, provides that each instance of violation may be considered a separate offense.

#### FACTUAL ALLEGATIONS

12. On July 22, 2021, the Idaho Department of Finance issued an *Order to Cease and Desist* against, among others, the Respondents Andrew, Maxfield, and Watson, ordering therein, that;

The Respondents shall CEASE AND DESIST from violations of the Idaho Uniform Securities Act (2004), . . . to include: offering or selling unregistered securities to Idaho residents; selling securities as an unregistered broker-dealer or agent; associating with unregistered agents in the selling of securities; and engaging in securities fraud (by failing to disclose material facts in connection with the offer or sale of securities to Idaho residents.”

13. The *Order to Cease and Desist* issued against the named Respondents, gave notice to the Respondents of the right to contest and the right to hearing with regard to the *Order to Cease and Desist*, the right to appeal, and the right to file a request for reconsideration.

14. As of the undersigned date, the July 22, 2021 *Order to Cease and Desist* is a final Order of the Idaho Department of Finance.

#### COUNT I

15. Paragraphs 1 through 14 are re-alleged as if fully set forth herein.

16. As to Respondent Andrew, the *Order to Cease and Desist* found that Andrew, in or about February 2016, acted as an investment advisor and offered and sold securities to one (1) Idaho consumer for consideration of a commission in the sum of \$4,485.00; during which time Andrew was not licensed to sell securities, nor was he registered as an investment advisor.

17. The *Order to Cease and Desist* also found that Andrew failed to disclose to the Idaho consumer that the investments he sold were not registered as securities as required by law.

18. Andrew violated section 41-1016(1)(h), Idaho Code, on two (2) occasions as alleged above, for his fraudulent or dishonest practices, for demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss to the public or others, in the conduct of business in Idaho or elsewhere.

19. To date, Andrew failed to report the Idaho Department of Finance *Order to Cease and Desist* action against Andrew to the Idaho Department of Insurance as required by law.

20. Andrew violated section 41-1021(1), Idaho Code.

21. According to the allegations set forth above, the Department has cause to seek a penalty in the amount of \$1,000 per violation for a total of \$3,000 administrative penalty.

## COUNT II

22. Paragraphs 1 through 21 are re-alleged as if fully set forth herein.

23. As to Respondent Maxfield, the *Order to Cease and Desist* found that Maxfield acted as an investment advisor and offered and sold securities in or about May or July 2016, to one (1) Idaho consumer, that included a commission for said transaction to Maxfield; during which time Maxfield was not licensed to sell securities, nor was he registered as an investment advisor.

24. As to Respondent Maxfield, the *Order to Cease and Desist* found that Maxfield acted as an investment advisor and offered and sold securities in or about March 2017, to one (1) Idaho consumer, that included a commission for said transaction to Maxfield; during which time Maxfield was not licensed to sell securities, nor was he registered as an investment advisor.

25. Maxfield received a total of \$9,462.50 in commissions for the transactions as alleged above.

26. The *Order to Cease and Desist* also found that Maxfield failed to disclose to the two (2) Idaho consumers that the investments he sold were not registered as securities as required by law.

27. Maxfield violated section 41-1016(1)(h), Idaho Code, on four (4) occasions as alleged above, for his fraudulent or dishonest practices, for demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss to the public or others, in the conduct of business in Idaho or elsewhere.

28. To date, Maxfield failed to report the Idaho Department of Finance *Order to Cease and Desist* action against Maxfield to the Idaho Department of Insurance as required by law.

29. Maxfield violated section 41-1021(1), Idaho Code.

30. According to the allegations set forth in Count II the Department has cause to seek a penalty in the amount of \$1,000 per violation for a total of \$5,000 administrative penalty.

### COUNT III

31. Paragraphs 1 through 30 are re-alleged as if fully set forth herein.

32. As to Respondent Watson, the *Order to Cease and Desist* found that Watson acted as an investment advisor and offered and sold securities in or about June 2016, to one (1) Idaho consumer, that included a commission for said transaction to Maxfield; during which time Maxfield was not licensed to sell securities, nor was he registered as an investment advisor.

33. As to Respondent Watson, the *Order to Cease and Desist* found that Watson acted as an investment advisor and offered and sold securities in or about March 2017, to one (1) Idaho consumer, that included a commission for said transaction to Watson; during which time Watson was not licensed to sell securities, nor was he registered as an investment advisor.

34. Watson received a total of \$10,119.60 in commissions for the transactions as alleged above.

35. The *Order to Cease and Desist* also found that Watson failed to disclose to the two (2) Idaho consumers that the investments he sold were not registered as securities as required by law.

36. Watson violated section 41-1016(1)(h), Idaho Code, on five (5) occasions as alleged above, for his fraudulent or dishonest practices, for demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss to the public or others, in the conduct of business in Idaho or elsewhere.

37. To date, Watson failed to report the Idaho Department of Finance *Order to Cease and Desist* action against Watson to the Idaho Department of Insurance as required by law.

38. Watson violated section 41-1021(1), Idaho Code.

39. According to the allegations set forth in Count II the Department has cause to seek a

penalty in the amount of \$1,000 per violation for a total of \$5,000 administrative penalty.

#### PRAYER FOR RELIEF

Based on the foregoing facts as alleged, the Department prays for relief as follows:

1. For an Order revoking AARON REID ANDREW's Idaho Non-Resident Producer License No. 298239, providing that AARON REID ANDREW shall not be issued any license under title 41, Idaho Code, for a period of five (5) years;
2. For an Order that, after expiration of the five-year revocation period, in accordance with section 41-1026(3), Idaho Code, in the event AARON REID ANDREW files an application for any license under title 41, Idaho Code, AARON REID ANDREW must petition and show good cause why the prior revocation should not be deemed a bar to the issuance of a new license;
3. For an Order imposing an administrative penalty against AARON REID ANDREW in an amount to be proven at hearing, but in the event of a default, an amount not less than Three Thousand Dollars (\$3,000), which represents \$1,000 per violation as alleged hereinabove;
4. For an Order revoking MARCUS KENT MAXFIELD's Idaho Non-Resident Producer License No. 464329, providing that MARCUS KENT MAXFIELD shall not be issued any license under title 41, Idaho Code, for a period of five (5) years;
5. For an Order that, after expiration of the five-year revocation period, in accordance with section 41-1026(3), Idaho Code, in the event MARCUS KENT MAXFIELD files an application for any license under title 41, Idaho Code, MARCUS KENT MAXFIELD must petition and show good cause why the prior revocation should not be deemed a bar to the issuance of a new license;
6. For an Order imposing an administrative penalty against MARCUS KENT MAXFIELD in an amount to be proven at hearing, but in the event of a default, an amount not less than Five Thousand Dollars (\$5,000), which represents \$1,000 per violation as alleged hereinabove;
7. For an Order revoking JEREMY ALMA WATSON's Idaho Non-Resident Producer

License No. 602329, providing that JEREMY ALMA WATSON shall not be issued any license under title 41, Idaho Code, for a period of five (5) years;


8. For an Order that, after expiration of the five-year revocation period, in accordance with section 41-1026(3), Idaho Code, in the event JEREMY ALMA WATSON files an application for any license under title 41, Idaho Code, JEREMY ALMA WATSON must petition and show good cause why the prior revocation should not be deemed a bar to the issuance of a new license;

9. For an Order imposing an administrative penalty against JEREMY ALMA WATSON in an amount to be proven at hearing, but in the event of a default, an amount not less than Five Thousand Dollars (\$5,000), which represents \$1,000 per violation as alleged hereinabove;

10. For such other and further relief as the Director deems just and necessary under the circumstances.

DATED this 15 day of <sup>April</sup>~~March~~, 2022.

STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL

  
JOHN C. KEENAN  
Deputy Attorney General

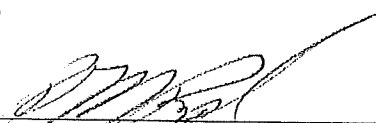
VERIFICATION

State of Idaho            )  
                                  : ss.  
County of Ada            )

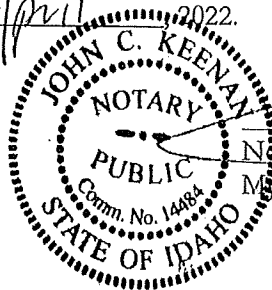
RANDALL PIPAL, Consumer Affairs Bureau Chief, Department of Insurance, State of Idaho, being first duly sworn, deposes and says:

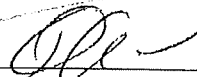
I have read the foregoing Complaint and know the contents thereof and the same are true to the best of my knowledge and belief.

Dated this 15<sup>th</sup> day of April, 2022.

  
\_\_\_\_\_  
RANDALL PIPAL

SUBSCRIBED AND SWORN to before me, the undersigned Notary Public for the state of Idaho, this 15 day of April, 2022.



  
\_\_\_\_\_  
Notary Public for Idaho  
My Commission Expires Nov 12, 2025

### NOTICE OF RIGHT TO A HEARING

TO: AARON REID ANDREW,  
MARCUS KENT MAXFIELD, and  
JEREMY ALMA WATSON:

You are hereby notified that, pursuant to Idaho Code § 41-232A(2), a written request for a hearing must be filed and served upon the Department within twenty-one (21) days after service of this Complaint. Failure to file and serve a written request for a hearing upon the Department within the twenty-one (21) day time period shall be deemed a waiver of the opportunity for a hearing and to contest the allegations in the Complaint, pursuant to Idaho Code § 41-232A(2).

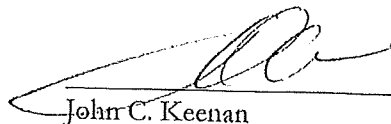
Any written request for a hearing shall be served on the Director of the Idaho Department of Insurance, addressed as follows:

Dean L. Cameron, Director  
Idaho Department of Insurance  
P.O. Box 83720  
Boise, ID 83720-0043

A copy shall also be provided to the Department's counsel in this matter, John C. Keenan, Deputy Attorney General, at the following address:

John C. Keenan  
Deputy Attorney General  
Idaho Department of Insurance  
P.O. Box 83720  
Boise, ID 83720-0043

In lieu of holding a hearing, this matter may be resolved by negotiation, stipulation, agreed settlement, or consent order, pursuant to Idaho Code § 67-5241. Should you wish to discuss this matter, please contact the undersigned deputy attorney general.

  
John C. Keenan



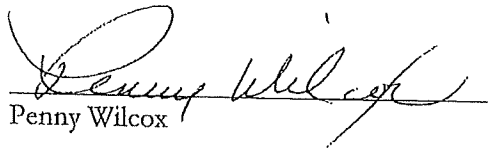
# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 18 day of April, 2022, I caused a true and correct copy of the foregoing VERIFIED COMPLAINT AND NOTICE OF RIGHT TO HEARING to be served upon the following parties by the designated means:

<p>Aaron R. Andrew PARAMOUNT FINANCIAL SERVICES 6340 S. 3000 E. Ste. 280 Salt Lake City, UT 84121-3561</p>	<p><input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:</p>
<p>Jeremy Watson LIVE ABUNDANT 6340 S. 3000 E. Ste 280 Salt Lake City, UT 84121-3561</p>	<p><input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:</p>
<p>Jeremy Watson 2197 E. High Mesa Drive Sandy, UT 84092-5542</p>	<p><input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:</p>
<p>Marcus Maxfield PARAMOUNT FINANCIAL SERVICES 6340 S. 3000 E. Ste. 280 Salt Lake City, UT 84121-3561</p>	<p><input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:</p>
<p>Karl T. Klein Deputy Attorney General Idaho Department of Insurance 700 W. State St., 3<sup>rd</sup> Floor Boise, ID 83720-0043</p>	<p><input type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email: <u>karl.klein@doi.idaho.gov</u></p>

(Con't)

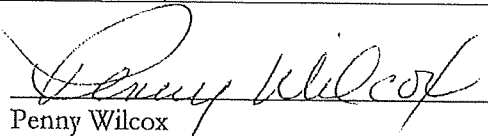
<p><i>Courtesy Copies</i></p> <p>Randy Pipal Bureau Chief, Consumer Services</p> <p>Eric Fletcher Bureau Chief, Company Activities Idaho Department of Insurance 700 W. State St., 3<sup>rd</sup> Floor Boise, ID 83720-0043</p>	<p><input type="checkbox"/> First Class Mail</p> <p><input type="checkbox"/> Certified Mail</p> <p><input type="checkbox"/> Hand Delivery</p> <p><input type="checkbox"/> Facsimile</p> <p><input checked="" type="checkbox"/> Email: <a href="mailto:randy.pipal@doi.idaho.gov">randy.pipal@doi.idaho.gov</a> <a href="mailto:eric.fletcher@doi.idaho.gov">eric.fletcher@doi.idaho.gov</a></p>
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Penny Wilcox

### SUPPLEMENTAL CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of April, 2022, I caused a true and correct copy of the foregoing VERIFIED COMPLAINT AND NOTICE OF RIGHT TO HEARING to be served upon the following parties by the designated means:

Aaron R. Andrew 2197 E. High Mesa Drive Sandy, UT 84092-5542	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:
Marcus Maxfield 15106 S. Gallant Drive Bluffdale, UT 84065-5014	<input checked="" type="checkbox"/> First Class Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Email:

  
Penny Wilcox