

DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND PROFESSIONAL REGISTRATION

P.O. Box 690, Jefferson City, Mo. 65102-0690

IN RE: CHARLES SCHWAB INSURANCE SERVICES
211 MAIN STREET
SAN FRANCISCO, CA 94105

TRACKING ID 216865 E

VOLUNTARY FORFEITURE AGREEMENT

It is hereby agreed by Charles Schwab Insurance Services, aka Charles Schwab & CO, Inc. (MO Lic# 0010103) and the Consumer Affairs Division of the Department of Insurance, Financial Institutions and Professional Registration, as follows:

WHEREAS, John M. Huff, is the duly appointed Director of the Department of Insurance, Financial Institutions and Professional Registration, State of Missouri (hereinafter, "Director" of the "Department"), whose duties, pursuant to Chapters 374 and 375, RSMo, include the supervision and regulation of the business of insurance;

WHEREAS, the Consumer Affairs Division of the Department is charged with investigating producers and companies engaged in the business of insurance pursuant to Sections 374.085 and 374.190, RSMo and is authorized by the Director to recommend enforcement action under the laws relating to insurance;

WHEREAS, Charles Schwab Insurance Services (hereinafter, "Schwab") has applied to renew it business entity producer (hereinafter, "BEP") insurance producer license with the Department, pursuant to Chapter 375, RSMo;

WHEREAS, the Consumer Affairs Division has received information that since the time of its last renewal, Schwab has failed to report to the Director three separate Financial Industry Regulatory Authority (hereinafter, "FINRA") administrative actions against its BEP license in another jurisdiction within thirty days of the final disposition of the matter. Specifically:

- AWC# 20110289412-01, signed by Jason Clague, SVP Trading, 08/02/2013
- AWC# 2011029074302, signed by Christopher W. Cuzzucoli, 12/16/2013
- AWC# 20100228149-01, signed by Jason Clague, Vice President, 05/09/2012

WHERAS, the failure to report each administrative actions is a separate violation of Section 375.141.6, RSMo (Supp. 2013), and subjects Schwab to enforcement action by the Director:

WHEREAS, Schwab has been informed of its right to counsel and of its right to contest any attempt by the Department to suspend, revoke, refuse to issue or renew its insurance producer license, and states that Schwab understands its rights to contest any such actions;

AND WHEREAS, Schwab, acknowledges and admits for purposes of this Agreement and for purposes of any future action by the Director or the Consumer Affairs Division based on any additional violation of the insurance laws or regulations by Schwab, in which action the Director or the Consumer Affairs Division alleges that the violations described herein form part of a course of conduct, a business practice, or other such series of similar violations, or that future violations by Schwab are committed knowingly, intentionally or in conscious disregard of the law, failed to disclose the above FINRA administrative actions, and that such conduct violated Section 375.141.6 RSMo;

NOW, THEREFORE, in lieu of any recommendation or initiation by the Consumer Affairs Division of any action based on the violation cited in this Agreement, and after being afforded the opportunity to consult legal counsel, Schwab does hereby voluntarily and knowingly surrender and forfeit the sum of seven hundred fifty dollars (\$750.00), such sum to be paid into the State School Moneys Fund pursuant to Sections 374.046 and 374.280, RSMo.

Schwab shall submit this sum to the Department by cashier's check or money order made payable to the State School Moneys Fund no later than **Thursday**, **May 29, 2014**.

The parties agree that, should the Director or the Division in the future allege an additional violation of the insurance laws or regulations by Schwab, nothing in this Agreement shall preclude the Director or the Consumer Affairs Division from introducing Schwab's admissions contained in this Agreement as evidence that the acts described herein form part of a course of conduct, a business practice, or other such series of similar violations, or for purposes of showing that such later alleged acts are committed knowingly, intentionally or in conscious disregard of the law.

DATED: 5/20/14

Christina M. Perrino-Valenzuela

Vice President

Charles Schwab Insurance Services

License No. 0010103

DATED: 6/5/14

Carrie Couch, Acting Director Consumer Affairs Division

DATED: 6.5-14

John M. Huff, Director

Department of Insurance, Financial Institutions and Professional

Registration

Return original to: E.J. Jackson, Speci

E.J. Jackson, Special Investigator Missouri Department of Insurance, Financial Institutions and Professional Registration PO Box 4001

Jefferson City, MO 65102

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