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**BEFORE THE UTAH INSURANCE COMMISSIONER**

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UTAH INSURANCE DEPARTMENT,  Complainant,  vs.  JW INSURANCE, LLC. dba JW HEALTH INSURANCE  and  JEREMY WARD,  Respondents.	FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER   Docket No. 2023-4562   Donald H. Hansen Administrative Law Judge/Presiding Officer
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Complainant, Utah Insurance Department ("Department") and Respondents, JW Insurance, LLC., dba JW Health Insurance, and Jeremy Ward ("Respondents"), have stipulated to entry of the following Findings of Fact, Conclusions of Law, and Order.

Based upon that stipulation, and good cause appearing, the Presiding Officer makes and enters the following:

**FINDINGS OF FACT**

1. Respondent JW Insurance, LLC., dba JW Health Insurance, is a resident producer

organization who was authorized to do the business of insurance in Utah under license number 750879 until October 31, 2021, when Respondent's license lapsed for failure to pay its license renewal fee.

2. Respondent's mailing address is [REDACTED].

3. Respondent Jeremy Ward is a resident producer individual insurance licensee who is authorized to do the business of insurance in Utah under license number 517611. Respondent Ward is the company owner of JW Insurance, LLC.

4. Respondent's mailing address is [REDACTED].

5. Utah Code §§ 31A-23a-103(1)(a) and 31A-23a-301(1) prohibits an individual from performing, offering to perform, or advertising any service as a producer, surplus lines producer, limited line producer, consultant, managing general agent or reinsurance intermediary in Utah, without a valid agency license. Further, an insurance organization must be licensed as an agency if the insurance organization acts as a producer.

6. Between October 31, 2021, through September 29, 2023, Respondents advertised and solicited insurance business in Utah on their website "[REDACTED]". During this time Respondent JW Insurance did not have an active agency license because its license had lapsed for failure to pay its license renewal fee.

7. Pursuant to Utah Code § 31A-23a-110(2), a licensee doing business under another name other than the licensee's legal name shall notify the commissioner before using the

assumed name in this state. Respondents failed to register the DBA “JW Health Insurance” with the commissioner.

8. During its investigation, the Department learned that between May 15, 2023, through September 29, 2023, Respondents advertised the services of Jeffrey Lynn Christensen, also known as “JC” (“Christensen”) , as an agent on Respondents website “[REDACTED]”, knowing that Christensen was not licensed to do insurance business in Utah.

9. On the JW Health Insurance website “[REDACTED]”, Respondents falsely asserted Christensen is an insurance agent. The website stated: “JC is a caring and compassionate insurance agent dedicated to providing personalized solutions for his clients. With a genuine desire to make a positive impact, JC goes above and beyond to understand his clients’ needs and tailer insurance plans that prioritize their well-being. His empathetic nature and deep industry knowledge make him a trusted advisor, ensuring his clients feel supported and protected. ‘JC is my agent’”.

10. The Department also learned that Respondents had utilized the services of Christensen as an agent, knowing that Christensen was not licensed to do insurance business in Utah.

11. On September 21, 2023, Christensen submitted a sworn application for written consent to engage in the business of insurance pursuant to 18 U.S.C §§ 1033 and 1034 (“1033 application”).

12. In his sworn 1033 application, Christensen confirmed he began working for JW Health Insurance on May 15, 2023. As part of his duties, Christensen stated he answered incoming calls and would “make calls out to see if people needed help with health insurance”, he learned how to navigate the government marketplace (Obamacare), he had given quotes to potential clients “about a dozen people or so,” and had referred friends and family to JW Health Insurance.

13. Respondents allowed Christensen to begin working and holding himself out as an insurance agent with JW Health Insurance prior to Christensen submitting his application for licensure to the Department or his 1033 application to the Commissioner. Christensen’s application for licensure was ultimately denied. (See UID v. Jeffrey Lynn Christensen, Docket No. 2023-4538).

### **CONCLUSIONS OF LAW**

1. The Utah Insurance Commissioner (“Commissioner”) has jurisdiction over the parties and this adjudicative proceeding pursuant to Utah Code §§ 31A-1-105 and 31A-2-201.

2. The Commissioner has legal authority to impose penalties on the Department's licensees who violate the Utah Insurance Code. Utah Code § 31A-2-308.

3. Respondents violated Utah Code § 31A-23a-103(1)(a), by failing to be exempted from the licensing requirement under Section 31A-23a-201 or 31A-23a-207, and they performed, offered to perform, or advertised any service as a producer, surplus lines producer, limited line producer, consultant, managing general agent, or reinsurance intermediary in Utah, without a valid individual or agency license issued under this chapter.

4. Respondents violated Utah Code § 31A-23a-301(1), by failing to be licensed as an

agency if the insurance organization acts as a producer; a surplus lines producer; a limited lines producer; a consultant; a managing general agent; or a reinsurance intermediary.

5. Respondents violated Utah Code § 31A-23a-103(1)(c), by utilizing the services of another as a producer, surplus lines producer, limited line producer, consultant, managing general agent, or reinsurance intermediary if that person knows or should know that the other does not have a license as required by law.

6. Respondents violated Utah Code § 31A-23a-110(2), by doing business under another name than the licensee's legal name and failing to notify the commissioner before using the assumed name in this state.

7. Respondents violated Utah Code § 31A-23a-111(5)(b)(xvi), when in the conduct of business in this state or elsewhere used fraudulent, coercive, or dishonest practices; or demonstrated incompetence, untrustworthiness, or financial irresponsibility.

8. Respondents violated Utah Code § 31A-23a-111(5)(b)(xxiv), by engaging in a method or practice in the conduct of business that endangers the legitimate interests of customers and the public.

9. As penalties for the violations in this case, Respondents should be ordered to pay a forfeiture of \$3,625.00.

### **ORDER**

Based on the foregoing Findings of Fact and Conclusions of Law, it is hereby Ordered that:

1. Respondents shall pay a forfeiture of \$3,625.00, jointly and severally, for the

violations described in the Conclusions of Law.

2. The forfeiture shall be paid in full to the Department no later than 30 days after this order is signed.
3. Respondents are ordered not to commit the violations described in the Conclusions of Law in the future.

DATED this 1<sup>st</sup> day of December 2023.

JONATHAN T. PIKE  
Utah Insurance Commissioner

/s/ Donald H. Hansen  
Donald H. Hansen  
Administrative Law Judge/Presiding Officer  
Utah Insurance Department  
4315 South 2700 West, Suite 2300  
Taylorsville, UT 84159  
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### **NOTICE TO RESPONDENT**

Failure to obey this Order may subject you to further penalties that include a forfeiture of up to \$2,500 per violation, with each day of the violation constituting a separate violation. Other penalties for failing to obey this Order may include license suspension, probation, refusal to renew, or revocation. Failure to obey this Order may also result in an action being taken against you in a court of competent jurisdiction where forfeitures of up to \$10,000 for each day the failure to comply continues until judgment is rendered. If you are licensed in other jurisdictions, you may be required to report this proceeding in those jurisdictions.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this date a true and correct copy of the foregoing Findings of Fact, Conclusions of Law and Order was emailed to:

JW Insurance, LLC  
[REDACTED]  
[REDACTED]  
[REDACTED]

Jeremy Ward  
[REDACTED]  
[REDACTED]  
[REDACTED]

and

Shelley A. Coudreaut  
Assistant Attorney General  
[sacoudreaut@agutah.gov](mailto:sacoudreaut@agutah.gov)

DATED this 1<sup>st</sup> day of December 2023.

/s/ Jeanine Couser  
Jeanine Couser  
Utah Insurance Department  
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