

LAWRENCE G. WASDEN
Attorney General

ALAN CONILOGUE
Deputy Attorney General
State of Idaho
P. O. Box 83720
Boise, ID 83720-0031
Telephone: 208.332.8093
Fax: 208.332.8016
ISBN 3196
alan.conilogue@finance.idaho.gov

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR ADA COUNTY**

STATE OF IDAHO, DEPARTMENT OF
FINANCE, SECURITIES BUREAU,

Plaintiff,

vs.

JEFFREY GRANT JEROME,

Defendant.

Case No. CV01-17-04212

**STIPULATION AND CONSENT TO
ENTRY OF JUDGMENT BY
DEFENDANT JEROME**

Plaintiff, State of Idaho, Department of Finance, (Department) and Defendant Jeffrey Grant Jerome (Jerome), have agreed to entry of judgment against Jerome, pursuant to the following Stipulation. The Department and Jerome request this court to enter judgment against Jerome in the form and substance set forth in the Judgment and Permanent Injunction filed concurrently herewith. In the event judgment is not entered pursuant to this Stipulation, this Stipulation shall

be of no effect whatever, and the making of this Stipulation shall be without prejudice to any party in this or any other proceeding. By signing and entering into this Stipulation, Jerome waives the right to a hearing and/or trial on the alleged violations in the Department's Verified Complaint.

STIPULATION

The Department and Jerome hereby stipulate as follows:

1. Jerome neither admits nor denies that he made material misrepresentations to Idaho investors and/or omitted to state material facts to Idaho investors, in violation of the anti-fraud provisions of Idaho Code § 30-14-501(2), as outlined in the Verified Complaint;

2. Jerome neither admits nor denies that he engaged in conduct in connection with the offer, sale and purchase of securities which operated as a fraud or deceit upon investors or prospective investors, in violation of Idaho Code § 30-14-501(3) as to each victim, as outlined in the Verified Complaint.

3. As outlined in the Verified Complaint, that Jerome issued, sold or offered for sale in Idaho securities in the form of promissory notes and contracts. Such securities were not registered with the Department as required by Idaho Code § 30-14-301. Jerome's failure to register such securities with the Department violated Idaho Code § 30-14-301.

4. As outlined in the Verified Complaint, that Jerome transacted business in Idaho as a broker-dealer and was not registered as a broker-dealer with the Department as required by Idaho Code § 30-14-401(a). Jerome's failure to register as a broker-dealer with the Department violated Idaho Code § 30-14-401.

5. Jerome consents to this Court's entry of a money judgment against him in the amount of one hundred fifty-two thousand six hundred seventy-six dollars (\$152,676) pursuant to Idaho Code § 30-14-603 for violations of Idaho's Uniform Securities Act. Amounts paid to the

Department pursuant to this paragraph shall be returned as restitution to persons who invested with Jerome as outlined in the Verified Complaint. This judgment shall accrue interest at the legal rate set forth in Idaho Code § 28-22-104 commencing 30 days after entry of judgment.

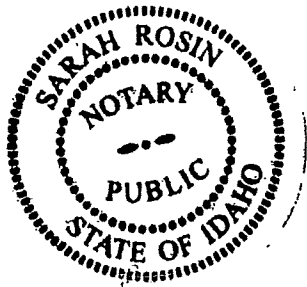
6. Jerome consents to this Court's entry of an injunction, in the form set forth in the proposed Judgment and Permanent Injunction filed herewith, permanently barring him from issuing, offering or selling securities in the State of Idaho.

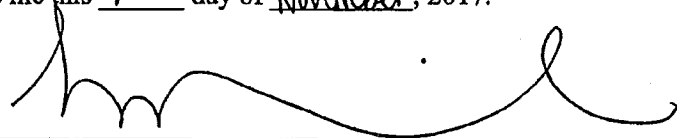
7. The parties agree to bear their own attorney fees and costs in this action.

DATED this 15th day of November, 2017.


JEFFREY GRANT JEROME

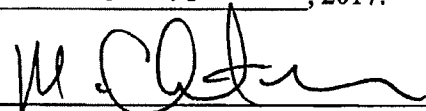
SUBSCRIBED AND SWORN to before me this 15th day of November, 2017.



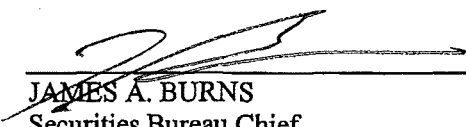

Notary Public for Idaho
Residing at: Bose, Idaho
My Comm. Exp.: 12/7/2022

APPROVED AS TO FORM AND CONTENT.

DATED this 16 day of November, 2017.


Matthew T. Christensen
Angstman Johnson
Counsel for Defendant

DATED this 16th day of November, 2017.



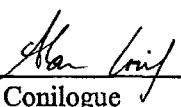
JAMES A. BURNS
Securities Bureau Chief
Idaho Department of Finance

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of November, 2017, I caused a true and accurate copy of the foregoing STIPULATION AND CONSENT TO ENTRY OF JUDGMENT BY DEFENDANT JEROME to be served on the following by the designated means:

Matthew T. Christensen
ANGSTMAN JOHNSON
3649 N. Lakeharbor Lane
Boise, Idaho 83703

[] U.S. mail, postage prepaid
[] certified mail
[] fax:
[X] email: mtc@angstman.com



Alan Conilogue
Deputy Attorney General