



**State of Missouri**

**DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND  
PROFESSIONAL REGISTRATION**

**IN RE:** )  
 )  
**JACK LEON PIERSEE, JR.,** ) **Case No. 151228660C**  
 )  
**Applicant.** )

**ORDER REFUSING TO RENEW RESIDENT INSURANCE PRODUCER LICENSE**

On September 1, 2016, the Consumer Affairs Division submitted a petition to the Director alleging cause to refuse to issue a resident insurance producer license to Jack Leon Piersee, Jr. After reviewing the Petition, the Investigative Report, and the entirety of the file, the Director issues the following findings of fact, conclusions of law, and order:

**FINDINGS OF FACT**

- 1. Jack Leon Piersee, Jr. ("Piersee") is a Missouri resident with an address of record of 2341 South West Waterfall Drive, Lee's Summit, MO 64081.
- 2. On December 13, 2012, the Department of Insurance, Financial Institutions and Professional Registration ("Department") received Piersee's electronic application for an individual resident insurance producer license ("2012 Application").
- 3. The "Attestation" section of the 2012 Application states, in relevant part:

1. I hereby certify that, under penalty of perjury, all of the information submitted in this application and attachments is true and complete. I am aware that submitting false information or omitting pertinent or material information in connection with this application is grounds for license revocation or denial of the license and may subject me to civil or criminal penalties.

\* \* \*

6. I acknowledge that I understand and will comply with the insurance laws and regulations of the jurisdiction[] to which I am applying for licensure.

- 4. Piersee accepted the "Attestation" section of his 2012 Application.

5. Background Question No. 5 of the 2012 Application asked the following:

Are you currently a party to, or have you ever been found liable in, any lawsuit, arbitrations or mediation proceeding involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty?

If you answer yes, you must attach to this application:

- a) a written statement summarizing the details of each incident,
- b) a copy of the Petition, Complaint or other document that commenced the lawsuit or arbitration, or mediation proceedings, and
- c) a copy of the official documents, which demonstrates the resolution of the charges or any final judgment.

6. Piersee answered “no” in response to Background Question No. 5 on his 2012 Application.

7. Contrary to Piersee’s response to Background Question No. 5 on his 2012 Application, Piersee had been named and found liable in lawsuits involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty:

- a. On August 22, 2012, Piersee was found liable in a civil suit alleging fraud. *Vienna Int’l, Inc. v. Piersee Piano & Organ, LLC, et al.*, Jackson Co. Cir. Ct., Case No. 1216-CV15950.
- b. On October 10, 2012, Piersee was found liable in a civil suit alleging conversion of funds and fraudulent misrepresentation. *Robert McMullen, et al. v. Jack Piersee, et al.*, Jackson Co. Cir. Ct., Case No. 1216-CV21449.

8. Relying on Piersee’s attestation and misrepresentation on his 2012 Application, the Department issued Piersee a resident insurance producer license (License No. 8282027) on December 13, 2012.

9. On January 15, 2013, the Cole County Prosecuting Attorney charged Piersee with Passing Bad Checks, a Class A Misdemeanor in violation of § 570.120, RSMo.<sup>1</sup> *State v. Jack L.G. Piersee, Jr.*, Cole Co. Cir. Ct., Case No. 13AC-CR00213. The Information filed in said case provides:

[O]n or about 06/26/2012, in the County of Cole, State of Missouri, the defendant, with purpose to defraud, issued a check in the amount of \$11200.00... payable to Sale/Missouri Dept. of Revenue knowing that it would not be paid.

*Id.*

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<sup>1</sup> All references to criminal statutes are to those contained in the version of the Revised Statutes of Missouri pursuant to which the court rendered its judgment.

10. Piersee was arraigned in Case No. 13AC-CR00213 on May 2, 2013. *Id.*
11. On January 8, 2014, the Department received Piersee's application for a license to produce an additional line of authority ("2014 Application").
12. The "Attestation" section of Piersee's 2014 Application states, in relevant part:

1. I hereby certify that, under penalty of perjury, all of the information submitted in this application and attachments is true and complete. I am aware that submitting false information or omitting pertinent or material information in connection with this application is grounds for license revocation or denial of the license and may subject me to civil or criminal penalties.

\* \* \*

6. I acknowledge that I understand and will comply with the insurance laws and regulations of the jurisdiction[] to which I am applying for licensure.

13. Piersee accepted the "Attestation" section of the 2014 Application.
14. Background Question No. 1 of the 2014 Application asked the following, in relevant part:

Have you ever been convicted of a crime, had a judgment withheld or deferred, or are you currently charged with committing a crime?
15. Piersee answered "no" in response to Background Question No. 1 of his 2014 Application.
16. Contrary to Piersee's response to Background Question No. 1 on his 2014 Application, Piersee was facing a misdemeanor criminal charge for Passing Bad Checks, a Class A Misdemeanor in violation of § 570.120, RSMo. *State v. Jack L.G. Piersee, Jr.*, Cole Co. Cir. Ct., Case No. 13AC-CR00213. The Prosecuting Attorney of Cole County initiated said criminal matter on January 15, 2013, and Piersee was arraigned on May 2, 2013. *Id.* Piersee was still facing said charge as of January 8, 2014, the date he submitted his 2014 Application.
17. Background Question No. 5 of the 2014 Application asked the following:

Are you currently a party to, or have you ever been found liable in, any lawsuit, arbitrations or mediation proceeding involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty?

If you answer yes, you must attach to this application:

- a) a written statement summarizing the details of each incident,

- b) a copy of the Petition, Complaint or other documents that commenced the lawsuit or arbitration, or mediation proceedings, and
- c) a copy of the official documents, which demonstrates the resolution of the charges or any final judgment.

18. Piersee answered “no” in response to Background Question No. 5 on his 2014 Application.
19. Contrary to Piersee’s response to Background Question No. 5 on his 2014 Application, as stated in paragraph 7, above, Piersee had been named as a party and found liable in lawsuits involving allegations of fraud, misappropriation or conversions of funds, misrepresentation or breach of fiduciary duty. *Vienna Int’l Inc. v. Piersee Piano & Organ, LLC et al*, Jackson Co. Cir. Ct., Case No. 1216-CV15950; *Robert McMullen, et al. v. Jack Piersee, et al.*, Jackson Co. Cir. Ct., Case No. 1216-CV21449.
20. Relying on Piersee’s attestation and misrepresentations on his 2014 Application, the Department granted Piersee a license to produce an additional line of authority.
21. On January 17, 2014, the Jackson County prosecutor charged Piersee with one count of Passing Bad Checks (value \$500 or more), a Class C Felony, and one count of Passing Bad Checks (value less than \$500), a Class A Misdemeanor, both in violation of § 570.120, RSMo. *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1216-CR05376-01.
22. On January 29, 2014, the Missouri Attorney General charged Piersee with two (2) counts of Theft/Stealing (value of property or services is \$25,000 or more), each a Class B Felony in violation of § 570.030, RSMo, and nine (9) counts of Unlawful Merchandising Practices, each a Class D Felony, in violation of § 407.020, RSMo. *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1316-CR03697-01.
23. The eleven Felony charges brought against Piersee in the Missouri Attorney General’s Complaint in Case No. 1316-CR03697-01 alleged Piersee used fraudulent, coercive, or dishonest practices to defraud customers of his piano consignment business. The charges alleged Piersee wrongfully withheld the proceeds of sales, misrepresented that monies had already been paid, or concealed, suppressed or omitted telling consignees that their pianos had been sold or that he had abandoned or lost their property.
24. On August 8, 2014, Piersee pled guilty to all counts charged by the Missouri Attorney General in Case No. 1316-CR03697-01. The court suspended imposition of Piersee’s sentence and ordered that he complete five years’ supervised probation and pay at least \$82,178.00 in restitution.
25. After learning of Piersee’s plea of guilty to Felony charges in Case No. 1316-CR03697-01, Special Investigator Dennis Fitzpatrick (“Fitzpatrick”) of the Consumer Affairs Division (“Division”) sent an inquiry letter dated October 30, 2014, to Piersee at the address listed on his 2014 Application. The inquiry letter requested a detailed letter of explanation of the case, specifically citing § 375.141.7, RSMo. The letter further cited 20

CSR 100-4.100 and informed Piersee that failure to respond could result in the refusal of a license application.

26. The United States Postal Service did not return the October 30, 2014, inquiry letter to the Division as undeliverable, and therefore it is presumed to have been received by Piersee.
27. Piersee failed to provide a written response to the Division's October 30, 2014, inquiry letter and failed to demonstrate a reasonable justification for the delay.
28. Fitzpatrick sent another inquiry letter, dated December 11, 2014, and marked "second request," to Piersee at the address listed on his 2014 Application. The inquiry letter again requested a detailed letter of explanation regarding the case, specifically citing § 375.141.7, RSMo. The letter further cited 20 CSR 100-4.100 and informed Piersee that failure to respond could result in the refusal of a license application.
29. Piersee failed to provide a written response to the Division's December 11, 2014, inquiry letter and failed to demonstrate a reasonable justification for the delay.
30. On December 13, 2014, Piersee's insurance producer license expired.
31. On November 3, 2015, the court suspended Piersee's probation in Case No. 1316-CR03697-01. On January 30, 2015, the court reinstated Piersee's probation, adding the condition that "Defendant shall not have any involvement in transfer of funds or receiving payment from the public in any occupation."
32. On February 26, 2015, the Department received Piersee's Application for Resident Insurance Producer License Renewal ("2015 Application").
33. The "Applicant's Certification and Attestation" section of the 2015 Application states, in relevant part:

1. I hereby certify that, under penalty of perjury, all of the information submitted in this application and attachments is true and complete. I am aware that submitting false information or omitting pertinent or material information in connection with this application is grounds for license revocation or denial of the license and may subject me to civil or criminal penalties.

\* \* \*

6. I acknowledge that I understand and will comply with the insurance laws and regulations of the jurisdiction[] to which I am applying for licensure.

34. Piersee accepted the "Applicant's Certification and Attestation" section of the 2015 Application.
35. Background Question No. 1A of the 2015 Application asked the following:

Have you been convicted of a misdemeanor, had a judgment withheld or deferred, or are you currently charged with committing a misdemeanor, which has not been previously reported to this insurance department? You may exclude the following misdemeanor convictions or pending misdemeanor charges: traffic citations, driving under the influence (DUI), driving while intoxicated (DWI), driving without a license, reckless driving, or driving with a suspended or revoked license. You may also exclude juvenile adjudications (offenses where you were adjudicated delinquent in a juvenile court).

36. Piersee answered “no” in response to Background Question No. 1A on his 2015 Application.

37. Contrary to Piersee’s response to Background Question No. 1A of his 2015 Application, Piersee had been charged with committing the following misdemeanors, which he had not previously reported to the Department:

a. On January 15, 2013, Piersee was charged with Passing Bad Check, a Class A Misdemeanor in violation of §570.120, RSMo. *State v. Jack L.G. Piersee, Jr.*, Cole Co. Cir. Ct., Case No. 13AC-CR00213. Piersee did not disclose this matter on his 2014 Application or report the charge to the Department. This misdemeanor criminal charge had yet to be resolved at the time of Piersee’s 2015 Application.

b. On January 17, 2014, Piersee was charged with Passing Bad Checks (value less than \$500), a Class A Misdemeanor in violation of § 570.120, RSMo. *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1216-CR05376-01. This misdemeanor criminal charge was still unresolved at the time of Piersee’s 2015 Application.

38. Background Question No. 1B of the 2015 Application asked the following:

Have you been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony, which has not been previously reported to this insurance department? You may exclude juvenile adjudications (offenses where you were adjudicated delinquent in a juvenile court).

39. Piersee answered “no” in response to Background Question No. 1B on his 2015 Application.

40. Contrary to Piersee’s response to Background Question No. 1B of his 2015 Application, Piersee had a judgment withheld or deferred or was charged with committing a felony in the following matters which he had not previously reported to the Department:

a. Piersee had been charged with a Felony in *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1216-CR05376-01. On January 17, 2014, the Jackson County prosecutor charged Piersee with “Passing Bad Check (value \$500 or more),” a Class C Felony in violation of § 570.120, RSMo. This Felony charge was unresolved at the

time of Piersee's 2015 Application and Piersee did not report this Felony prosecution to the Department.

- b. Piersee had a judgment withheld or deferred in *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1316-CR03697-01. On August 8, 2014 Piersee pled guilty to two (2) counts of Theft/Stealing and nine (9) counts of Unlawful Merchandising Practices. *Id.* The court suspended imposition of his sentence, ordering Piersee to complete five years' supervised probation and pay at least \$82,178.00 in restitution. *Id.*
41. On August 25, 2015, Piersee pled guilty to Passing Bad Checks, a Class A Misdemeanor in violation of § 570.120, RSMo. *State v. Jack L.G. Piersee, Jr.*, Cole Co. Cir. Ct., Case No. 13AC-CR00213. The court sentenced Piersee to 120 days' incarceration but suspended execution of Piersee's sentence, ordering two years' unsupervised probation and the payment of \$9,200.00 in restitution.
42. On February 25, 2016, Piersee pled guilty to Passing Bad Checks, a Class C Felony in violation of § 570.120, RSMo. *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1216-CR05376-01. The court suspended imposition of his sentence, ordering Piersee complete 3 years' probation.
43. At no time between his arraignment on April 21, 2014, and his guilty plea on February 25, 2016, did Piersee report his prosecution for Passing Bad Checks, a Class C Felony in violation of § 570.120, RSMo, in Case No. 1216-CR05376-01, to the Department.
44. During its investigation, the Division also discovered that on September 26, 2014, the Jackson County Circuit Court entered a judgment against Piersee for unpaid state income taxes for the filing years of 2009, 2010, and 2011 as follows:

The Director of Revenue, under Section 143.902, RSMo, hereby certifies that the following assessment of tax, interest, additions to tax, penalties, and fees have been made and become final [in the amount of \$6,250.76]. Interest continues to accrue as provided by law until the full amount of the tax liability is paid.

*Dep't of Revenue v. Jack L. Piersee, et al.*, Jackson Co. Cir. Ct., Missouri, Case No. 1416-MC15341.
45. It is inferable, and hereby found as fact, that Piersee answered "no" in response to Background Questions No. 5 on his 2012 and 2014 Applications in order to misrepresent to the Director that he had never been found liable in lawsuits involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty, and thereby improve the chances that the Director would approve his 2012 and 2014 Applications and grant him a resident insurance producer license and a license to produce an additional line of authority.
46. It is also inferable, and hereby found as fact, that Piersee answered "no" in response to Background Question No. 1 on his 2014 Application in order to misrepresent to the

Director that he was not facing criminal charges in the case of *State v. Jack L.G. Piersee, Jr.*, Cole Co. Cir. Ct., Case No. 13AC-CR00213, and thereby improve the likelihood that the Director would approve his 2014 Application and grant him a license to produce an additional line of authority.

47. It is further inferable, and hereby found as fact, that Piersee answered “no” in response to Background Questions No. 1A and 1B on his 2015 Application in order to misrepresent to the Director that he was not facing criminal charges in the cases of *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1216-CR05376-01 and *State v. Jack L.G. Piersee, Jr.*, Cole Co. Cir. Ct., Case No.13AC-CR00213, and thereby improve the chances that the Director would approve his 2015 Application and renew his resident insurance producer license.

### CONCLUSIONS OF LAW

48. Section 375.141, RSMo (Supp. 2013)<sup>2</sup> provides, in part:

1. The director may suspend, revoke, refuse to issue or refuse to renew an insurance producer license for any one or more of the following causes:

(1) Intentionally providing materially incorrect, misleading, incomplete or untrue information in the license application;

(2) Violating any insurance laws, or violating any regulation, subpoena or order of the director or of another insurance commissioner in any other state;

(3) Obtaining or attempting to obtain a license through material misrepresentation or fraud;

\* \* \*

(6) Having been convicted of a felony or crime involving moral turpitude;

\* \* \*

(8) Using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere [or]

\* \* \*

(14) Failing to comply with any administrative or court order directing payment of state or federal income tax.

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<sup>2</sup> All civil statutory references are to the Revised Statutes of Missouri (2000) as updated by the 2013 Supplement.

7. Within thirty days of the initial pretrial hearing date, a producer shall report to the director any criminal prosecution for a felony or a crime involving moral turpitude of the producer taken in any jurisdiction. The report shall include a copy of the indictment or information filed, the order resulting from the hearing and any other relevant legal documents.

49. Title 20 CSR 100-4.100(2)(A), Required Response to Inquiries by the Consumer Affairs Division, provides:

Upon receipt of any inquiry from the division, every person shall mail to the division an adequate response to the inquiry within twenty (20) days from the date the division mails the inquiry. An envelope's postmark shall determine the date of mailing. When the requested response is not produced by the person within twenty (20) days, this nonproduction shall be deemed a violation of this rule, unless the person can demonstrate that there is reasonable justification for that delay.

50. "There is a presumption that a letter duly mailed has been received by the addressee." *Clear v. Missouri Coordinating Bd. for Higher Educ.*, 23 S.W.3d 896, 900 (Mo. App. 2000) (internal citations omitted).

51. Section 143.902.1(2) provides, in relevant part:

If any taxpayer fails to pay any tax, interest, additions to tax or penalties imposed by this chapter when due and the assessment for which has become final, the director may file ... [a] certificate of lien specifying the amount of the tax, interest, additions to tax and penalties due and the name of the liable taxpayer. ... From the time of the filing of the certificate of lien or certificate of delinquency with the clerk of the circuit court, the amount of the tax, interest, additions to tax and penalties specified therein shall have the full force and effect of a default judgment of the circuit court until satisfied.

52. The crime of passing bad checks in violation of § 570.020, RSMo., is a crime that necessarily involves moral turpitude. *State Bd. of Nursing v. Anderson*, Mo. Admin. Hrg. Comm., No. 11-0254 BN (Mo. Admin. Hrg. Comm'n, Oct. 3, 2012).

53. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(1) because Piersee intentionally provided materially incorrect, misleading, incomplete or untrue information in an application for a license when he failed to disclose that he had been named as a party and found liable in lawsuits involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty in response to Background Question No. 5 on his 2012 Application.

54. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(1) because Piersee intentionally provided materially incorrect, misleading, incomplete or untrue information on his 2014 Application when he failed to disclose:

- a. that he had been found liable in lawsuits involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty in response to Background Question No. 5, and
  - b. that he was facing a criminal charge for Passing Bad Checks, a Class A Misdemeanor, in response to Background Question No. 1 on his 2014 Application.
55. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(1) because Piersee intentionally provided materially incorrect, misleading, incomplete or untrue information on his 2015 Application when he failed to disclose that he was facing felony and misdemeanor charges and that he had a judgment withheld or deferred in response to Background Questions No. 1A and 1B of his 2015 Application.
56. Each instance in which Piersee intentionally provided materially incorrect, misleading, incomplete or untrue information in an application for a license constitutes separate and sufficient cause for refusal pursuant to § 375.141.1(1).
57. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(2) because Piersee failed to respond to two the Division's October 30, 2014, and December 11, 2014 inquiry letters and failed to provide reasonable justifications for the delay, thereby twice violating 20 CSR 100-4.100(2)(A), a regulation of the Director.
58. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(2) because Piersee violated § 375.141.7 when he failed to report criminal prosecutions for a felony or a crime involving moral turpitude within thirty days of the initial pretrial hearing date. Specifically, Piersee failed to report:
- a. His prosecution for a crime involving moral turpitude, namely, Passing Bad Checks, a Class A Misdemeanor in violation of § 570.120, RSMo. *State v. Jack L. G. Piersee Jr.*, Cole Co. Cir. Ct., Case No. 13AC-CR00213.
  - b. His prosecution for crimes involving moral turpitude and a Felony, specifically Passing Bad Checks in violation of § 570.120, RSMo. *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1216-CR05376-01.
  - c. His prosecution for eleven Felonies and crimes involving moral turpitude, namely, Theft/Stealing (value of property or services is \$25,000 or more), each a Class B Felony in violation of § 570.030, RSMo, and nine (9) counts of Unlawful Merchandising Practices, each a Class D Felony, in violation of § 407.020, RSMo. *State v. Jack Leon Piersee, Jr.*, Jackson Co. Cir. Ct., Case No. 1316-CR03697-01.
59. Each instance in which Piersee violated § 375.141.7 constitutes a separate and sufficient cause for refusal pursuant to § 375.141.1(2).
60. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(3) because Piersee obtained a license through material misrepresentation or fraud when he received a license after misrepresenting to the Director that he had

never been found liable in a lawsuit involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty on his 2012 Application.

61. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(3) because Piersee obtained a license through material misrepresentation or fraud when he was granted authority to produce an additional line of authority after misrepresenting to the Director that he had never been found liable in a lawsuit involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty, and that he was not facing a criminal charge on his 2014 Application.
62. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(3) because Piersee attempted to obtain a license through material misrepresentation or fraud when he applied for renewal of his license after failing to report his criminal prosecution for a felony or a crime involving moral turpitude and when he failed to disclose his criminal history on his 2015 Application.
63. Each instance in which Piersee obtained or attempted to obtain a license through material misrepresentation or fraud constitutes separate and sufficient cause for refusal pursuant to § 375.141.1(3).
64. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(6) because Piersee has been convicted of a crime involving moral turpitude, namely:
  - a. Passing Bad Check, a Class A Misdemeanor in violation of §570.120, RSMo. *State v. Jack L.G. Piersee, Jr.*, Cole Co. Cir. Ct., Case No. 13AC-CR00213.
65. The Director may refuse to renew Piersee's resident insurance producer license pursuant to § 375.141.1(8) because Piersee used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility in the conduct of business when he engaged in the conduct establishing the factual basis for his pleas of guilty in criminal suits alleging unlawful merchandising practices, theft/stealing, and when he issued checks knowing they would not be honored.
66. Each instance in which Piersee used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness or financial irresponsibility in the conduct of business constitutes a separate and sufficient cause for refusal pursuant to § 375.141.1(8).
67. The Director may refuse to issue an insurance producer license to Piersee under § 375.141.1(14) because Piersee failed to comply with an administrative order directing payment of state income tax. *Dep't of Revenue v. Jack L. Piersee, et al.*, Jackson Co. Cir. Ct., Missouri, Case No. 1416-MC15341.

68. The Director has considered Piersee's history and all of the circumstances surrounding his 2015 Application. Accordingly, the Director exercises his discretion to refuse to renew Piersee's resident insurance producer license.
69. This order is in the public interest.

**IT IS THEREFORE ORDERED** that Jack L. Piersee, Jr.'s application for insurance producer license renewal is hereby **REFUSED**.

**SO ORDERED.**

WITNESS MY HAND THIS 6<sup>th</sup> DAY OF SEPTEMBER, 2016.



A handwritten signature in blue ink, reading "John M. Huff", is written over a horizontal line.

**JOHN M. HUFF**  
**DIRECTOR**

**NOTICE**

**TO: Applicant and any unnamed persons aggrieved by this Order:**

You may request a hearing in this matter. You may do so by filing a complaint with the Administrative Hearing Commission of Missouri, P.O. Box 1557, Jefferson City, Missouri, within 30 days after the mailing of this notice pursuant to Section 621.120, RSMo. Pursuant to 1 CSR 15-3.290, unless you send your complaint by registered or certified mail, it will not be considered filed until the Administrative Hearing Commission receives it.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of September, 2016, a copy of the foregoing Order and Notice was served upon the Applicant in this matter by United Parcel Service, signature required, to the following address:

Jack L. Piersee, JR.  
2341 South West Waterfall, Dr.  
Lee's Summit, MO 64081

Tracking No. 1Z0R15W84298152952



Kathryn Latimer  
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