STATE OF MISSOURI

DEPARTMENT OF COMMERCE AND INSURANCE

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

IN RE:	)	
	)	**DCI No. 2412230907C**
DALANDA CANTRELL PETERS,	)	
	)	**AHC No. 25-0972**
Respondent.	)	

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER OF DISCIPLINE

Based on the competent and substantial evidence in the whole record, I, Gina L. Clark, Deputy Director of the Missouri Department of Commerce and Insurance, hereby issue the following Findings of Fact, Conclusions of Law, and Order of Discipline:

FINDINGS OF FACT

1. Angela L. Nelson is the duly appointed Director of the Missouri Department of Commerce and Insurance ("Director" of the "Department"), whose duties, under Chapters 374 and 375, RSMo, include the supervision, regulation, and discipline of non-resident insurance producers licensed to conduct business in Missouri.

2. Gina L. Clark is the duly appointed Deputy Director of the Department whose powers and duties, under Section 374.080.1, RSMo, include all the powers and duties of the Director during a vacancy in the office, and during the absence, inability or suspension of the Director.

3. Dalanda Cantrell Peters ("Peters") has a resident producer license issued by Mississippi (National Producer Number 20980886).

4. On or about November 13, 2023, Peters completed the Uniform Application for Individual Insurance Producer License ("Application") to obtain a non-resident insurance producer license from the Department.

5. The Application was submitted by Sajeo Arguelles, President of Call Health, LLC ("Submitter"), Peters' employer.

6. The Submitter declared: "As the authorized submitter, I declare that the applicant [Peters] provided all the information submitted on this application."

7. Peters answered "No" to all of the Background Questions on the Application, including Question Number 1B, which asks, in part: "Have you ever been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony?"

8. Peters answered "Yes" to the Attestation, which provides, in pertinent part:

> 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.

9. The Department granted Peters a non-resident insurance producer license (MO License #3002527581), effective November 13, 2023, through reciprocity with Peters' domicile state of Mississippi.

10. Peters' Missouri non-resident insurance license is currently active. It is due to expire on May 21, 2026.

11. On or about January 23, 2024, Peters applied for, but was denied, a non-resident insurance producer license in Florida. The licensing agent for the Florida Department of Financial Services, Bureau of Licensing, stated that Florida denied the license because Peters did not acknowledge that he had a criminal record on his Florida application.

12. Peters did not report Florida's denial to the Department within thirty days in violation of Section 375.141.6, RSMo.

13. The Department discovered that Florida denied Peters' application through the Regulatory Information Retrieval System ("RIRS").

14. RIRS contains records of regulatory actions taken by state insurance departments against producers, companies, and other related entities engaged in the business of insurance.

15. On or about June 26, 2024, the Department's Senior Investigator Jodi Lehman ("Lehman") emailed Peters to inform him that the Department was aware that a regulatory action had been taken against him in Florida due to an undisclosed felony conviction. Lehman requested details of the underlying conviction and a statement about why he did not report the conviction on the Application.

16. On or about July 10, 2024, Peters answered Lehman by providing a written statement about his murder conviction along with incomplete copies of court documents.

17. Lehman obtained certified court records for *State of Mississippi v. Dalanda Peters*, Case No. 8017-2 (Cir. Ct. of Pearl River County, MS). She discovered that a jury found Peters guilty of murder on August 28, 1995, for shooting the victim numerous times after an argument.

18. Peters was sentenced to life imprisonment in the custody of the Mississippi Department of Corrections. The conviction was affirmed on appeal. *Dalanda C. Peters v. State of Mississippi*, Case No. 95-KA-01005 COA (Miss. Ct. App. 1997) [Unpublished].

19. In Missouri, under Section 557.021.3(1)(A), RSMo, an offense is considered to be a class A felony "if the authorized penalty includes death, life imprisonment or imprisonment for a term of twenty years or more."

PROCEDURAL HISTORY

20. On July 7, 2025, the Director filed her Complaint against Peters with the Administrative Hearing Commission ("Commission"), asserting that cause exists to discipline Peters' non-resident insurance producer license.

21. The Commission attempted to serve Peters by United States Postal Service ("USPS") Certified Mail, return receipt requested, but was unable to do so.

22. On July 17, 2025, the Commission informed Katherine Walsh ("Walsh"), counsel for the Director, that the Notice of Complaint/Hearing was not delivered and that there was a forwarding address of 2412 E. Birch Dr., Gulfport, MS 39503, but that USPS did not forward the packet.

23. The Commission attempted service at the forwarding address by certified mail, return receipt requested, but it was also returned unsigned.

24. On August 12, 2025, the Commission forwarded a personal service packet to the Director to attempt service.

25. On September 15, 2015, the Director obtained service by certified mail on Peters at 2412 E. Birch Dr., Gulfport, MS 39503. The return receipt was signed by Wilma L. Peters. Proof of Personal Service was filed with the Commission on September 23, 2025.

26. Under 1 CSR 15-3.380(3)(B), Peters' answer to the Director's Complaint was due "within thirty (30) days after acknowledgment of receipt of the notice of complaint or return certified mail receipt is filed in the case." Here, the return certified mail receipt was filed on September 23, 2025, and Peters' Answer was due on October 23, 2025.

27. On December 22, 2025, the Director filed a Motion for Default Judgment due to Peters having not answered the Complaint.

28. The Commission held a 15-minute status hearing, via WebEx, on January 8, 2026. The Director appeared through Walsh. Peters failed to appear.

29. On January 23, 2026, the Commission entered its Default Decision deciding that the Director was entitled to the relief requested in her Complaint.

30. On March 10, 2025, the Commission sent its Certified Record to the Department, which included: (1) the Director's July 7, 2025, Complaint; (2) the Proof of Service filed on September 23, 2025, (3) the Director's Motion for Default Decision filed on December 22, 2025; and (4) the Default Decision, which was issued on January 23, 2026.

31. On March 11, 2026, the Director entered an order naming Robert Tillman ("Tillman") as Hearing Officer in this matter. Tillman set the matter for hearing on May 6, 2026, to determine what discipline, if any, should be imposed on Peters.

32. Notice of Hearing was served on Peters on April 24, 2026, via UPS, signature required.

33. The hearing was held on May 6, 2026. The Department's Consumer Affairs Division (the "Division") appeared by Walsh and Peters did not appear. Lehman testified regarding her investigation, and documentary evidence was presented.

34. At the close of the hearing, the Division asked that Peters' non-resident insurance producer license be revoked.

CONCLUSIONS OF LAW

35. Section 621.110, RSMo, outlines the procedure after the Commission finds cause to discipline a license. It provides, in relevant part:

> Upon a finding in any cause charged by the complaint for which the license may be suspended or revoked as provided in the statutes and regulations relating to the profession or vocation of the licensee…, the commission shall deliver or transmit by mail to the agency which issued the license the record and transcript of the proceedings before the commission together with the commission's findings of fact and conclusions of law. The commission may make recommendations as to appropriate disciplinary action but any such recommendations shall not be binding upon the agency ….Within thirty days after receipt of the record of the proceedings before the commission and the findings of fact, conclusions of law, and recommendations, if any, of the commission, the agency shall set the matter for hearing upon the issue of appropriate disciplinary action and shall notify the licensee of the time and place of the hearing[.]…The licensee may appear at said hearing and be represented by counsel. The

> agency may receive evidence relevant to said issue from the licensee or any other source. After such hearing the agency may order any disciplinary measure it deems appropriate and which is authorized by law.

36. Where an agency seeks to discipline a license, the Commission "finds the predicate facts as whether cause exists" for the discipline and then the agency "exercises final decision-making authority concerning the discipline to be imposed." *Tendai v. Board of Reg'n for the Healing Arts*, 161 S.W.3d 358, 364-65 (Mo. banc 2005), *overruled on other grounds, Albanna v. Board of Reg'n for the Healing Arts*, 293 S.W.3d 423, 428 n.2 (Mo. banc 2009).

37. Section 374.051.2, RSMo, relating to a proceeding to revoke or suspend a license, states, in relevant part:

> If a proceeding is instituted to revoke or suspend a license of any person under sections 374.755, 375.787, and 375.141, the director shall refer the matter to the administrative hearing commission by directing the filing of a complaint. The administrative hearing commission shall conduct hearings and make findings of fact and conclusions of law in such cases. The director shall have the burden of proving cause for discipline. If cause is found the administrative hearing commission shall submit its findings of fact and conclusions of law to the director, who may determine appropriate discipline.

38. The Director's Complaint asked the Commission to "make findings of fact and conclusions of law stating that [the Director] has established cause to revoke Peters' non-resident insurance producer license." In its Default Decision, the Commission entered its "default decision against [Peters] establishing that [the Director] is entitled to the relief requested in the complaint." The Default Decision entered by the Commission constitutes the decision that cause to discipline the license exists.

39. Section 375.141, RSMo, provides in relevant 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 any insurance commissioner in any other state;
>
> (3) Obtaining or attempting to obtain a license through material misrepresentation or fraud;
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> * * *
>
> (6) Having been convicted of a felony or crime involving moral turpitude; [or]
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> * * *
>
> (9) Having an insurance producer license, or its equivalent, denied, suspended or revoked in any other state, province, district or territory[.]

40. The Director has discretion to discipline Peters' non-resident insurance producer license, including the discretion to revoke such license. Sections 374.051.2, 374.080.1, 375.141, and 621.110, RSMo.

41. The Deputy Director "shall possess all the powers and perform all the duties attached by law to the office of director during a vacancy in the office, and during the absence, inability or suspension of [her] principal." Section 374.080.1, RSMo.

42. Cause exists to discipline Peters' non-resident insurance producer license under Section 375.141, RSMo. The principal purpose of Section 375.141, RSMo, is not

to punish licensees, but to protect the public. *Ballew v. Ainsworth*, 670 S.W.2d 94, 100 (Mo. App. E.D. 1984).

Intentionally Providing Materially Incorrect, Misleading, Incomplete or Untrue Information in the Application and Obtaining or Attempting to Obtain a License through Material Misrepresentation or Fraud (Counts I and III)

43. Cause exists to discipline Peters' non-resident insurance producer license under Section 375.141.1(1) and (3), RSMo, for intentionally providing materially incorrect, misleading, incomplete or untrue information in his license application and attempting to obtain a license through such material misrepresentation.

44. The dictionary definition of "material" is "having real importance or great consequences[.]" MERRIAM-WEBSTER COLLEGIATE DICTIONARY, 765 (11th Ed. 2004); *Dir, of Dep't of Com. and Ins. v. Erica Nichole Mickle, Mo. Admin. Hrg. Comm'n*, Case No. 21-1453 (Sept. 9, 2021). A misrepresentation is material if the Department "acting reasonably and naturally in accord with [its] custom and practice, would have relied on the representation." *Smith ex rel. Stephan v. AF&L Ins. Co.*, 147 S.W.3d 767, 774 (Mo. App. E.D. 2004).

45. The information Peters failed to disclose was a material misrepresentation as the Department relies on the information contained in the Application when deciding whether to issue a license. A conviction for murder that qualifies as a class A felony is material to this consideration. Peters submitted his application to the Department for the purpose of obtaining a non-resident insurance producer license. The application contained a material misrepresentation, e.g. Peters denied that he had been convicted of a felony when he had been convicted of murder and sentenced to life imprisonment.

46. The Director has cause to discipline Peters' non-resident insurance producer license under Section 375.141.1(1) and (3), RSMo.

Violating Any Insurance Laws, or Violating any Regulation, Subpoena or Order of the Director or of Another Insurance Commissioner in Any Other State

47. Cause exists to discipline Peters' non-resident insurance producer license under Section 375.141.1(2), RSMo, because he violated an insurance law, specifically Section 375.141.6, RSMo.

48. Section 375.141.6, RSMo, provides as follows:

> An insurance producer shall report to the director any administrative action taken against the producer in another jurisdiction or by another governmental agency in this state within thirty days of the final disposition of the matter. This report shall include a copy of the order, consent order or other relevant documents.

49. Peters was granted a non-resident insurance producer license in Missouri in November 2023. In January 2024, Peters applied for a non-resident insurance producer license in Florida. Peters' Florida application was denied because of his felony conviction in Mississippi.

50. Peters did not notify the Department that he was denied an application for non-resident insurance producer license in Florida after his Missouri license was issued. A denial is an administrative action that Respondent must report to the Department. *Director of Dep't of Ins., Fin. Inst. and Prof. Reg. v. Vela, Mo. Admin. Hrg. Comm'n*, Case No. 17-0423 (Sept. 1, 2017).

51. The Director has cause to discipline Peters' non-resident insurance producer license under Section 375.141.1(2), RSMo.

<u>Having Been Convicted of a Felony or a Crime Involving Moral Turpitude</u>

52. Cause exists to discipline Peters' non-resident insurance producer license under Section 375.141.1(6), RSMo, for both having been convicted of a felony and for having been convicted of a crime involving moral turpitude.

53. Peters was convicted of murder, which would be a class A felony if committed in Missouri. The certified records of the Pearl River County Circuit Court, Mississippi prove the conviction. *State of Mississippi v. Dalanda C. Peters*, Case No. 8017-2 (Pearl River Cnty., MS).

54. Peters' conviction was also a crime of moral turpitude. "Moral turpitude" has been defined as "an act of baseness, vileness, or depravity in the private and social duties which a man owes to his fellowman or to society in general, contrary to the accepted and customary rule of right and duty between man and man; everything 'done contrary to justice, honesty, modesty, and good morals.'" *Brehe v. Mo. Dept. of Elem. & Second. Educ.*, 213 S.W.3d 720, 725 (Mo. App. W.D. 2007).

55. Missouri cases analyzing crimes of moral turpitude generally classify crimes into three categories. The first are crimes that necessarily involve moral turpitude, such as fraud. The second are crimes that are not classified as moral turpitude because they are so obviously petty, such as illegal parking. The third and final are crimes that may be saturated with moral turpitude, but do not necessarily involve it, such as refusal to answer questions before a congressional committee. *Id*. Murder is among the crimes that is considered a category one crime that necessarily involves moral turpitude. *Id.* In those cases, it is only

necessary to show that there was a conviction or guilty plea, whether or not the defendant received a sentence. *Id.*

56. Peters was convicted of murder, which is a crime that necessarily involves moral turpitude and that is an "act of baseness, vileness, or depravity in the private and social duties which a man owes to his fellowman or society in general[.]" *Id.*

57. The Director has cause to discipline Peters' non-resident insurance producer license under Section 375.141.1(6), RSMo.

<u>Having an Insurance Producer License Denied, Suspended, or Revoked in Any Other State, Province, District or Territory</u>

58. Cause exists to discipline Peters' non-resident insurance producer license under Section 375.141.1(9), RSMo, because he had an insurance producer license denied in another state.

59. On or about January 23, 2024, Peters' application for a non-resident insurance producer license in Florida was denied because Peters did not acknowledge his previous felony conviction.

60. The Director has cause to discipline Respondent's non-resident insurance producer license under Section 375.141.1(9), RSMo.

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ORDER

Based on the foregoing findings and conclusions, the non-resident insurance producer license of Dalanda Cantrell Peters (License No. 3002527581) is hereby **REVOKED**.

SO ORDERED, SIGNED, AND OFFICIAL SEAL AFFIXED THIS 20 **DAY OF** May **, 2026.**

Gina L. Clark, Deputy Director
Missouri Department of
Commerce and Insurance

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served via UPS, signature required, on this 21st day of May, 2026 to:

Dalanda C. Peters
2412 E. Birch Drive
Gulfport, MS 39503

Tracking No. 1Z0R15W84298148314

and hand-delivered, with a courtesy copy by email, to:

Katherine Walsh
301 West High Street, Room 530
P.O. Box 690
Jefferson City, MO 65102
Katherine.Walsh@insurance.mo.gov

Kathryn Latimer

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