

DEPARTMENT OF INSURANCE

STATE OF WYOMING

WYOMING INSURANCE DEPARTMENT,)	
)	
Petitioner,)	
)	
vs.)	Docket No. 08-14
)	
GORDON R. MOORE,)	
)	
Respondent.)	

PETITION FOR NOTICE AND ORDER TO SHOW CAUSE

COMES NOW the Wyoming Department of Insurance, acting by and through Stephanie Bryant McGee, Deputy Commissioner, and pursuant to Wyo. Stat. §§ 26-1-103, 26-2-109, 26-2-111, 26-9-208, and 26-9-211; Chapter 32 § 4 of the Wyoming Insurance Department Regulations and Rules for Practice and Procedure Before the Department; and, the Wyoming Administrative Procedure Act, Wyo. Stat. § 16-3-101 *et seq.*, herewith moves the Wyoming Insurance Commissioner for the issuance of a Notice and Order to Show Cause directed to Gordon R. Moore, whose last reported address was 2030 Falcon Drive, Longmont, CO 80503. As cause for this Petition, the Wyoming Insurance Department states and alleges as follows:

1. The Wyoming Insurance Commissioner has jurisdiction over this matter pursuant to Wyo. Stat. §§ 26-1-103, 26-1-108, 26-9-208 and 26-9-211.
2. Respondent is licensed by the Wyoming Department of Insurance as a nonresident producer, License No. 157042 issued December 5, 2006, with a renewal date of April 30, 2009. The Respondent's Individual ID is 4372211 and his National Producer ID is 6785190.
3. The business records of the Department of Insurance show Respondent is currently affiliated with Integrity Life Insurance Company.
4. On or about April 4, 2008, a State RIRS Notification was received from the National Association of Insurance Commissioners notifying the Department that a regulatory action had been taken against Respondent Gordon R. Moore's license in the state of Utah. Pursuant to Wyo. Stat. § 26-9-214 Petitioner further investigated the cause for termination.
5. Petitioner's investigation revealed that Petitioner's license was revoked by the Utah Insurance Department on April 1, 2008, based on demonstrated lack of fitness or trustworthiness.

FILED		
WYOMING INSURANCE DEPARTMENT		
DATE	<i>Sept. 19, 2008</i>	
BY	<i>Dee Ann Hilbelson</i>	

6. Petitioner's further investigation revealed that a Stipulation for Final Agency Order was entered into between Respondent Gordon R. Moore and the Colorado Division of Insurance which was filed with the Division of Insurance, State of Colorado on August 13, 2008. The stipulation stated, in part, that on or about August 24, 2007, the Colorado Statewide Grand Jury presented a 45 Count Indictment in the District Court of the City and County of Denver against Respondent for counts involving, *inter alia* theft, computer crime, forgery, securities fraud and attempt to influence a public official. The stipulation stated that 42 of the counts were dismissed and that Respondent had entered a guilty plea to the following counts: count one – theft of more than \$15,000, a class three felony; count two – computer crime, a class three felony; and count forty-five – securities fraud, a class three felony.

7. Pursuant to the stipulation described in the preceding paragraph, on August 15, 2008, a Final Agency Order was entered by the Commissioner of the Colorado Division of Insurance, revoking the insurance producer license of Gordon R. Moore, assessing a civil penalty in the amount of \$2,000 and prohibiting Respondent from re-applying for licensure in Colorado for a period of two years.

8. Pursuant to Wyo. Stat. § 26-9-208(a)(i) one of the conditions for nonresident licensing is that the person is currently licensed as a resident and is in good standing in his home state. Respondent's home state is Colorado.

9. Pursuant to Wyo. Stat. § 26-9-211(a)(ii), (iv), (vi) (viii) and (ix), the Commissioner may place on probation, suspend, revoke or refuse to issue or renew an insurance producer's license for having violated any insurance laws, or violating any regulation, subpoena or order of the commissioner or of another state's insurance commissioner; for improperly withholding, misappropriating or converting any monies or properties received in the course of doing insurance business; for having been convicted of a felony; for using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere; or for having an insurance producer license or its equivalent, denied, suspended or revoked in any other state, province, district or territory.

WHEREFORE the Department of Insurance respectfully prays the Wyoming Insurance Commissioner to:

A. Revoke the Respondent's nonresident producer license for violation of Wyo. Stat. §§ 26-9-208 and 26-9-211.

B. To enter such other and further relief as may be permitted by law.

Dated this 19 day of September, 2008.



Stephanie Bryant McGee
Deputy Commissioner
Wyoming Department of Insurance
106 East 6th Avenue
Cheyenne, Wyoming 82002
(307) 777-6896