

BEFORE THE MISSOURI REAL ESTATE COMMISSION

MISSOURI REAL ESTATE COMMISSION)	
)	
Petitioner,)	
)	
v.)	No. 12-1494 RE
)	
Patti Crawford,)	
)	
Respondent.)	

**FINDINGS OF FACT, CONCLUSIONS OF LAW
AND DISCIPLINARY ORDER**

On or about March 29, 2013, the Administrative Hearing Commission entered its Default Decision in the case of *Missouri Real Estate Commission v. Patti Crawford*, No. 12-1494 RE. In that Default Decision, the Administrative Hearing Commission found that Respondent Patti Crawford’s real estate salesperson license (license no. 1999045380) is subject to disciplinary action by the Missouri Real Estate Commission (“Commission”) pursuant to § 339.100.2 (3), (15), (16) and (19) RSMo.¹

The Commission has received and reviewed the record of the proceedings before the Administrative Hearing Commission and the Default Decision of the Administrative Hearing Commission. The record of the Administrative Hearing Commission is incorporated herein by reference in its entirety.

Pursuant to notice and §§ 621.110 and 339.100.3, RSMo, the Commission held a hearing on October 2, 2013, at the Division of Professional Registration, 3605 Missouri Boulevard, Jefferson City, Missouri, for the purpose of determining the appropriate disciplinary action against Respondent’s license. All of the members of the Commission were present throughout

¹ All statutory references are to the Revised Statutes of Missouri 2000, as amended, unless otherwise indicated.

the meeting. Rosemary Vitale participated through conference call. Further, each member of this Commission has read the Default Decision of the Administrative Hearing Commission. The Commission was represented by Assistant Attorney General Edwin Frownfelter. Respondent having received proper notice and opportunity to appear did not appear in person or through legal counsel. After being present and considering all of the evidence presented during the hearing, the Commission issues the following Findings of Facts, Conclusions of Law and Order.

Based upon the foregoing the Commission hereby states:

I.

FINDINGS OF FACT

1. The Commission is an agency of the state of Missouri created and established pursuant to § 339.120, RSMo, for the purpose of licensing all persons engaged in the practice as a real estate broker or salesperson in this state. The Commission has control and supervision of the licensed occupations and enforcement of the terms and provisions of §§ 339.010-339.205 and 339.710-339.855, RSMo.

2. The Commission hereby adopts and incorporates by reference the Default Decision, the Complainant upon which it was based and the record of the Administrative Hearing Commission in *Missouri Real Estate Commission v. Patti Crawford*, Case No. 12-1494 RE, issued March 29, 2013, in its entirety and takes official notice thereof.

3. The Commission set this matter for disciplinary hearing and served notice of the disciplinary hearing upon Respondent in a proper and timely fashion. Respondent failed to appear in person or through legal counsel at the hearing before the Commission

4. This Commission licensed Respondent Patti Crawford as a real estate salesperson, license number 1999045380. Respondent's salesperson license was not current at all times

relevant to this proceeding. Respondent's salesperson license expired on September 30, 2012 due to failure to renew.

II.

CONCLUSIONS OF LAW

5. This Commission has jurisdiction over this proceeding pursuant to §§ 621.110 and 339.100, RSMo.

6. The Commission expressly adopts and incorporates by reference the Default Decision with the Complaint upon which the Default Decision was based, issued by the Administrative Hearing Commission dated March 29, 2013, in *Missouri Real Estate Commission v Patti Crawford*, Case No. 12-1494 RE, takes official notice thereof, and hereby enters its Conclusions of Law consistent therewith.

7. As a result of the foregoing, and in accordance with the Administrative Hearing Commission's Default Decision dated March 29, 2013, Respondent's real estate salesperson license, number 1999045380, is subject to disciplinary action by the Commission pursuant to § 339.100.2 (3), (15), (16) and (19) RSMo.

8. The Commission has determined that this Order is necessary to ensure the protection of the public.

III.

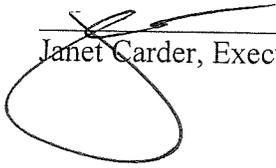
ORDER

Having fully considered all the evidence before the Commission, and giving full weight to the Default Decision of the Administrative Hearing Commission, it is the **ORDER** of the Commission that the real estate salesperson license of Patti Crawford (license no. 1999045380) is hereby **REVOKED**. All evidence of licensure shall be immediately returned to the Commission.

The Commission will maintain this Order as an open, public record of the Commission as provided in Chapters 339, 610, and 324, RSMo.

SO ORDERED, EFFECTIVE THIS 17th DAY OF October, 2013.

MISSOURI REAL ESTATE COMMISSION



Janet Carder, Executive Director

Before the
Administrative Hearing Commission
State of Missouri



MISSOURI REAL ESTATE COMMISSION,)
)
) Petitioner,)
)
) vs.)
)
) PATTI CRAWFORD,)
)
) Respondent.)

No. 12-1494 RE

DECISION

After reconsideration, we grant the Missouri Real Estate Commission’s (“MREC”) motion for default decision (“the motion”).

Procedure

On August 10, 2012, the MREC filed a complaint seeking to discipline Patti Crawford’s license as a real estate salesperson. After numerous attempts to serve Crawford by certified mail and personal service, we granted the MREC’s motion for service by publication. In accordance with § 506.160.3,¹ publication took place on January 24, January 31, February 7, and February 14, 2013. The notice of publication states that unless Crawford filed an answer or other pleading, or otherwise appeared to defend against the complaint within 45 days after the date of first publication, a default decision might be entered against her under the authority of § 536.063(6).

¹ RSMo 2000. Statutory citations are to RSMo. Supp. 2012, unless otherwise noted.

The MREC filed the motion on March 13, 2013. We denied the motion on March 15, 2013. The MREC filed a motion to reconsider on March 21, 2013.

Analysis

In its motion, the MREC cites § 536.063(6), which states:

When a holder of a license, registration, permit, or certificate of authority issued by the division of professional registration or a board, commission, or committee of the division of professional registration against whom an affirmative decision is sought has failed to plead or otherwise respond in the contested case and **adequate notice has been given under section 536.067 upon a properly pled writing filed to initiate the contested case under this chapter**, a default decision shall be entered against the licensee without further proceedings. The default decision shall grant such relief as requested by the division of professional registration, board, committee, commission, or office in the writing initiating the contested case as allowed by law.

(Emphasis added). Crawford has been given notice as required by law, and she has failed to plead or otherwise respond in this case.

In our order denying default decision, we found that Counts II and III were properly pled and that Count I was not properly pled because it did not address the exception to licensure for property management in § 339.010.7(5). In its motion to reconsider, the MREC argues that its complaint was properly pled because it meets the requirements of 1 CSR 15-3.350; § 339.010.7(5) is an affirmative defense that the MREC was not required to plead, and the conduct alleged in its complaint does not fit within the exception of § 339.010.7(5). Upon reconsideration, we determine that Count I was “properly pled.”

Our regulation 1 CSR 15-3.350(2)(A) requires a complaint to set forth:

3. Any fact supporting the relief that the agency seeks, including any conduct that a licensee has committed that is cause for discipline, with sufficient specificity to enable the licensee to address the charge at hearing; and
4. Any provision of law that allows discipline for such facts.

In addition, the Missouri Court of Appeals has described the required degree of specificity for the agency's factual allegations:

The specificity of charges could be at essentially three levels. The most general is simply a statement that the accused has violated one or more of the statutory grounds for discipline without further elaboration, i.e., he has been grossly negligent. Such an allegation is insufficient to allow preparation of a viable defense. The second level involves a greater specificity in setting forth the course of conduct deemed to establish the statutory ground for discipline. The third level involves a degree of specificity setting forth each specific individual act or omission comprising the course of conduct. Due process requires no more than compliance with the second level.

Duncan v. Missouri Bd. for Arch'ts, Prof'l Eng'rs & Land Surv'rs, 744 S.W.2d 524, 539 (Mo. App., E.D. 1988) (citations omitted).

Count I of the MREC's complaint in this case sets forth conduct allegedly committed by Crawford that *could* be considered the unlicensed practice of real estate and not covered by the exception set forth in § 339.010.7(5). For example, it alleges that Crawford received, deposited, and endorsed rental checks for properties that were not her own. The MREC argues that the statutory exception "does not permit an unlicensed manager to receive payments made out to her as agent for another, endorse checks, and deposit them into a bank account controlled by her." *Suggestions in Support of Petitioner's Motion to Reconsider Order Denying Default Decision* at 9. This is no doubt a correct statement, but such specific conduct is not alleged in Count I. Nevertheless, this portion of the complaint is adequate to put Crawford on notice of the conduct and disciplinary charge against which she must defend. It therefore meets the requirements in our regulation as well as the due process requirements set forth in *Duncan*.

In addition, we must consider that:

the provisions of Chapter 339 are for the protection of the public and are an exercise of the police power of the state, and, therefore, plaintiff, who seeks shelter under an exemption provision of said

Chapter, must present a clear case, free from all doubt, as such provision, being in derogation of the primary purpose of the Real Estate Agents and Brokers Law, must be strictly construed against the person claiming the exemption and in favor of the public. 33 Am.Jur., Licenses, Sec. 38, pp. 363—364.

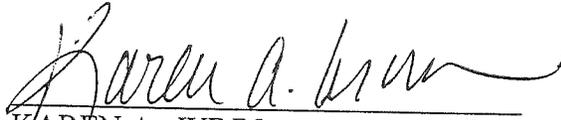
Gilbert v. Edwards, 276 S.W.2d 611, 616-17 (Mo. App. 1955), quoted in *Miller Nationwide Real Estate Corp. v. Sikeston Motel Corp.*, 418 S.W.2d 173, 177 (Mo. 1967).

We determine that the MREC properly pled Count I in the complaint.

Conclusion

We grant the MREC's motion for reconsideration. We enter a default decision in favor of the MREC. We cancel the hearing.

SO ORDERED on March 29, 2013.



KAREN A. WINN
Commissioner

BEFORE THE
ADMINISTRATIVE HEARING COMMISSION
STATE OF MISSOURI

Missouri Real Estate Commission)
3650 Missouri Boulevard)
P.O. Box 339)
Jefferson City, MO 65102-1339,)
Petitioner,)

v.)

Patti Crawford)
1404 B Hollyhock Dr,)
P.O. Box 68)
Cameron, MO 64429)
Respondent.)

Case #: 12-1494 PE

Received at
Administrative Hearing Commission

AUG 13 2012

Filed by Certified / Registered Mail

COMPLAINT

8/10/12

Petitioner, Missouri Real Estate Commission, by and through the Attorney General of the State of Missouri, and for its cause of action against Respondent, Patti Crawford, states the following:

1. The Missouri Real Estate Commission ("MREC") is an agency of the State of Missouri, created and established pursuant to Section 339.120, RSMo,¹ for the purpose of executing and enforcing the provisions of Chapter 339, RSMo, Real Estate Agents, Brokers, Appraisers and Escrow Agents.

¹ All statutory references are to the Revised Statutes of Missouri, Supp. 2010, unless otherwise indicated.

2. Respondent, Patti Crawford, is an adult individual whose registered address is 1404 B Hollyhock Drive, P.O. Box 68, Cameron, Missouri 64429, and who holds a Missouri license as a Real Estate Salesperson, License No. 1999045380, which is current through September 30, 2012, but which is not active because it was cancelled when her broker, Katherine Wallis (Wallis), did not renew her license.

3. Crawford's affiliation with Wallis ended on or before June 30, 2010, when Wallis' broker license expired. Wallis did not file the appropriate closure forms or return Crawford's license to the MREC.

4. Jurisdiction and venue are proper before the Administrative Hearing Commission pursuant to § 621.045, RSMo, and § 339.120, RSMo.

APPLICABLE LAW

5. At all times in question,² Section 339.020, RSMo, stated:

It shall be unlawful for any person, partnership, limited partnership, limited liability company, association, professional corporation, or corporation, foreign or domestic, to act as a real estate broker, real estate broker-salesperson, or real estate salesperson, or to advertise or assume to act as such without a license first procured from the commission.

² Chapter 339 was amended in A.L. 2010 H.B. 1692, et al. merged with S.B. 754, effective August 28, 2010, and 2011 H.B. 315, effective August 28, 2011, but the amendments did not affect the application of any section cited in this complaint to the facts alleged.

6. At all times in question, Section 339.040.1, RSMo (Supp.2010),
stated,

Licenses shall be granted only to persons who present, and corporations, associations, or partnerships whose officers, associates, or partners present, satisfactory proof to the commission that they:

- (1) Are persons of good moral character; and
- (2) Bear a good reputation for honesty, integrity, and fair dealing; and
- (3) Are competent to transact the business of a broker or salesperson in such a manner as to safeguard the interest of the public.

7. At all times in question, Section 339.100.2, RSMo, stated in pertinent part:

The commission may cause a complaint to be filed with the administrative hearing commission as provided by the provisions of chapter 621 against any person or entity licensed under this chapter or any licensee who has failed to renew or has surrendered his or her individual or entity license for any one or any combination of the following acts:

* * *

(3) Failing within a reasonable time to account for or to remit any moneys, valuable documents or other property, coming into his or her possession, which belongs to others;

* * *

(15) Violation of, or attempting to violate, directly or indirectly, or assisting or enabling any person to violate, any provision of sections

339.010 to 339.180 and sections 339.710 to 339.860, or of any lawful rule adopted pursuant to sections 339.010 to 339.180 and sections 339.710 to 339.860;

(16) Committing any act which would otherwise be grounds for the commission to refuse to issue a license under section 339.040;

* * *

(19) Any other conduct which constitutes untrustworthy, improper or fraudulent business dealings, demonstrates bad faith or incompetence, misconduct, or gross negligence.

8. At all times in question, Section 339.180.1 stated, in pertinent part:

It shall be unlawful for any person or entity not licensed under this chapter to perform any act for which a real estate license is required. . . .

9. At all times in question, Section 339.730.1, RSMo, stated in pertinent part:

A licensee representing a seller or landlord as a seller's agent or a landlord's agent shall be a limited agent with the following duties and obligations:

- (1) To perform the terms of the written agreement made with the client;
- (2) To exercise reasonable skill and care for the client;
- (3) To promote the interests of the client with the utmost good faith, loyalty, and fidelity . . .
- (4) To account in a timely manner for all money and property received;
- (5) To comply with all requirements of sections 339.710 to 339.860, subsection 2 of section 339.100, and any rules and regulations promulgated pursuant to those sections[.]

10. The MREC has adopted a valid regulation codified at 20 CSR 2250-4.050, which states in pertinent part:

(2) A broker-salesperson or salesperson license shall be issued only to a person who is associated with a licensed broker. The license of each broker-salesperson or salesperson shall be mailed to the broker. A broker-salesperson or salesperson cannot be licensed with more than one (1) broker during the same period of time.

(3) Within seventy-two (72) hours of the termination of the association of any brokersalesperson or salesperson, a broker shall notify the commission and shall return to the commission that licensee's license. The broker shall provide a dated and timed receipt to the licensee when the licensee submits a letter of termination to the broker. When a licensee's license is surrendered to the commission, the licensee shall have six (6) months in which to transfer to another broker or change license status. If the application for transfer or change in status is not made within the six (6)-month period, the applicant will be required to complete the required Missouri Real Estate Practice Course and show proof of satisfactory completion of that course within six (6) months prior to reinstatement of the license. If the license is not transferred or placed on inactive status, or if no status change has been made within the subsequent renewal period, the licensee will be required to requalify as if an original applicant.

(4) An original licensee or a licensee changing license status/type shall not be deemed to be entitled to engage in any activity for which a license is required until the new license is received by the broker or until written notification is received from the commission that the application is being processed. When a broker-salesperson or salesperson transfers from one broker to another without changing license type, the licensee shall be deemed transferred at the time the properly completed application is mailed by certified, registered, or overnight delivery, if all materials required to transfer are mailed under one (1) cover. The new broker is responsible for seeing that the

application is complete and that the application for transfer is mailed by certified, registered, or overnight delivery to ensure proof of delivery. If the application is deemed incomplete, the transfer will not be effective until the new license is received by the broker or until written notification is received from the commission that the application is being processed.

COUNT I: UNLICENSED PRACTICE

11. The allegations of Paragraphs 1 through 10 are incorporated herein.
12. Crawford held her salesperson license through an association with Katherine Wallis, a broker.
13. Crawford's affiliation with Wallis ended on or before June 30, 2010, when Wallis' broker license expired. Wallis did not file the appropriate closure forms or return Crawford's license to the MREC.
14. Under the terms of 20 CSR 2250-4.050(4), Crawford was not authorized to work as a real estate salesperson once her association with Wallis ended, unless and until her license was transferred to another broker or she applied for and was granted a different license.
15. Crawford was informed by the MREC in September 2010 that her license was cancelled.

16. Crawford continued to practice real estate without being properly affiliated with or supervised by a broker from on or before July 1, 2010 through December 2010.

17. Crawford failed to notify two property owners with whom she held property management agreements, Rose Stanton and Michael McCullough, that she had lost her license and could no longer manage their properties.

18. Crawford continued to collect rent payments from tenants in properties owned by Stanton at 502 Short Street, Cameron, receiving, endorsing, and depositing rental checks as follows:

- (1) Rent check deposited and management fee taken July 2, 2010;
- (2) Rent check deposited and management fee taken July 30, 2010;
- (3) Rent check deposited, stopped by tenant, August 2, 2010;
- (4) Management fee taken, August 15, 2010.

19. Stanton cancelled her agreement with Crawford by letter dated August 4, 2010.

20. Crawford continued to collect rent payments from tenants in properties owned by McCullough at 504 Short Street, Cameron, receiving, endorsing, and depositing rental checks as follows:

- (1) Rent check on 504B deposited September 3, 2010;

- (2) Rent check on 504A deposited September 4, 2010;
- (3) Rent check on 504B deposited October 2, 2010;
- (4) Rent check on 504A deposited October 3, 2010;
- (5) Rent check on 504B deposited November 3, 2010;
- (6) Rent check on 504A deposited November 4, 2010;
- (7) Rent check on 504B deposited December 3, 2010;
- (8) Rent check on 504A deposited December 11, 2010;

21. Crawford retained Thompson Plumbing for repairs on 504A on September 23, 2010, and paid the invoice for those services on October 30, 2010.

22. Crawford received a notice of intent to terminate the lease from the tenant in 504A on December 1, 2010, but failed to notify McCullough.

23. Crawford took no steps to notify McCullough she could not perform the property management contract until he terminated her services and retained a new property manager in January, 2011.

24. By continuing to collect rents and otherwise act under the terms of her property management agreements with Stanton and McCullough after June 30, 2010, Crawford performed services which require licensure by the MREC, in violation of Sections 339.020, 339.040.1, and 339.180.1, RSMo (Supp.2010), which is cause for discipline under Section 339.100.2(15), RSMo.

COUNT II: McCULLOUGH MATTER

25. The allegations of Paragraphs 1 through 24 are incorporated herein.

26. On April 15, 2006, CT Properties, of which Wallis was the broker and with which Crawford was associated, entered into an agreement with Michael S. and Margaret A. McCullough to manage two properties at 504A and 504B Short Street, Cameron, Missouri.

27. In 2007, Wallis turned the management of McCullough's properties over to Crawford.

28. After the termination of her relationship with broker Wallis, Crawford collected rent payments on 504A Short Street on the following occasions:

- (1) Rent check deposited September 4, 2010, in the amount of \$700;
- (2) Rent check deposited October 3, 2010, in the amount of \$700;
- (3) Rent check deposited November 4, 2010, in the amount of \$700;
- (4) Rent check deposited December 11, 2010, in the amount of \$700.
- (5) The total of checks collected was \$2800.

29. After the termination of her relationship with broker Wallis, Crawford collected rent payments on 504B Short Street on the following occasions:

- (1) Rent check deposited September 3, 2010, in the amount of \$600;
- (2) Rent check deposited October 2, 2010, in the amount of \$600;
- (3) Rent check on November 3, 2010, in the amount of \$600;
- (4) Rent check deposited December 3, 2010, in the amount of \$600.
- (5) The total of checks collected was \$2400.

30. In all, Crawford collected \$5200 in rents on the two Short Street properties of McCullough between September and December, 2010. Crawford failed to deliver any of this amount to McCullough, but converted the entire sum of \$5200 to her own use and benefit.

31. Crawford also held security deposits in the amount of \$1600 on the two apartments, which she failed to deliver to McCullough upon termination of the management relationship.

32. McCullough hired another property manager to take over the duties of the properties, but Crawford failed to respond to that property manager's communications.

33. By failing upon cancellation of her license and termination of the property management contract to deliver to McCullough rents and security

deposits received and held in trust, Crawford failed to account for or to remit any moneys, valuable documents or other property, coming into his or her possession, which belongs to others, which is cause for discipline under Section 339.100.2(3), RSMo.

34. By failing upon cancellation of her license and termination of the property management contract to deliver to McCullough rents and security deposits received and held in trust, Crawford failed to perform the terms of a written agreement with the client in violation of Section 339.730.1(1), failed to exercise reasonable skill and care for the client in violation of Section 339.730.1(2), failed to promote the interests of the client with the utmost good faith, loyalty, and fidelity in violation of Section 339.730.1(3), failed to account in a timely manner for all money and property received in violation of Section 339.730.1(4), and failed to comply with all requirements of sections 339.710 to 339.860, subsection 2 of section 339.100, and any rules and regulations promulgated pursuant to those sections, in violation of Section 339.730.1(5), RSMo, which is cause for discipline under the terms of Section 339.100.2(15).

35. By converting to her own use and benefit rents and security deposits received on behalf of McCullough, which belong to McCullough, Crawford committed acts which would otherwise be grounds for the commission to

refuse to issue a license under section 339.040, which is cause for discipline under Section 339.100.2(16), RSMo.

36. By withholding from McCullough the information that her real estate license had been cancelled and continuing to collect rents and engage in property management when she was not licensed to do so, Crawford committed other conduct which constitutes untrustworthy, improper or fraudulent business dealings, demonstrates bad faith or incompetence, misconduct, or gross negligence, which is cause for discipline under Section 339.100.2(19), RSMo.

COUNT III: STANTON MATTER

37. The allegations of Paragraphs 1 through 36 are incorporated herein.

38. Since May 2010, Crawford managed real property for Rose Stanton (Stanton) commonly described as 502 Short Avenue, Apartments A and B, Cameron, Missouri.

39. Crawford collected rents from the tenants for the two apartments for May-August 2010, but did not forward the rents to Stanton.

40. In August 2010, Stanton terminated the relationship and requested the tenants to cancel their August 2010 rent checks paid to Stanton and issue new checks directly to her.

41. Upon request, Crawford forwarded the May and June 2010 rents, but did not pay the July 2010 rent or deliver the keys for the property to Stanton.

42. Crawford failed to advise Stanton of the cancellation of her real estate license.

43. Crawford has continually failed to remit and/or account for the funds and property due and owing to Stanton, including collected rents, security deposits, and keys.

44. By failing to remit and/or account for the funds and property due and owing to Stanton, including collected rents, security deposits, and keys, and failing to advise Stanton of the cancellation of her license, Crawford failed to account for or to remit any moneys, valuable documents or other property, coming into his or her possession, which belongs to others, which is cause for discipline under Section 339.100.2(3), RSMo.

45. By failing to remit and/or account for the funds and property due and owing to Stanton, including collected rents, security deposits, and keys, and failing to advise Stanton of the cancellation of her license, Crawford failed to perform the terms of a written agreement with the client in violation of Section 339.730.1(1), failed to exercise reasonable skill and care for the client in violation of Section 339.730.1(2), failed to promote the interests of

the client with the utmost good faith, loyalty, and fidelity in violation of Section 339.730.1(3), failed to account in a timely manner for all money and property received in violation of Section 339.730.1(4), and failed to comply with all requirements of sections 339.710 to 339.860, subsection 2 of section 339.100, and any rules and regulations promulgated pursuant to those sections, in violation of Section 339.730.1(5), RSMo, which is cause for discipline under the terms of Section 339.100.2(15).

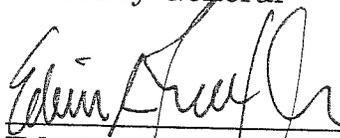
46. By failing to remit and/or account for the funds and property due and owing to Stanton, including collected rents, security deposits, and keys, and failing to advise Stanton of the cancellation of her license, Crawford committed acts which would otherwise be grounds for the commission to refuse to issue a license under section 339.040, which is cause for discipline under Section 339.100.2(16), RSMo.

47. By failing to remit and/or account for the funds and property due and owing to Stanton, including collected rents, security deposits, and keys, and failing to advise Stanton of the cancellation of her license, Crawford committed other conduct which constitutes untrustworthy, improper or fraudulent business dealings, demonstrates bad faith or incompetence, misconduct, or gross negligence, which is cause for discipline under Section 339.100.2(19), RSMo.

WHEREFORE, Petitioner prays the Administrative Hearing Commission to conduct a hearing in this case pursuant to sections 621.015 to 621.205, RSMo, and thereafter issue its findings of fact and conclusions of law that the Petitioner may discipline Respondent Patti Crawford's Real Estate Salesperson license under the relevant provisions of Chapter 339, RSMo, and the regulations promulgated thereunder.

Respectfully submitted,

CHRISTOPHER A. KOSTER
Attorney General



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