

No. 2018-5781

**Official Order
of the
Texas Commissioner of Insurance**

Date: DEC 14 2018

Subject Considered:

Texas Department of Insurance

v.

Michelle Annette Gilmore

SOAH Docket No. 454-18-2235.C

General remarks and official action taken:

The subject of this order is the application of Michelle Annette Gilmore for an adjuster all lines license.

Background

Michelle Annette Gilmore applied for an adjuster all lines license. The Texas Department of Insurance (TDI) sought to deny her application based on her criminal history.

A hearing in this case was held before Fernando Rodriguez, administrative law judge (ALJ) for the State Office of Administrative Hearings. ALJ Rodriguez signed a proposal for decision containing his recommendation and underlying rationale and including separately stated findings of fact and conclusions of law. A copy of the proposal for decision is attached as Exhibit A.

Changes to Proposed Findings of Fact No. 2, No. 4, and No. 6

An agency may change a finding of fact or conclusion of law made by an administrative law judge if the agency determines that a technical error in a finding of fact should be changed. Tex. Gov. Code § 2001.058(e).

In Exhibit A, proposed finding of fact no. 2 references April 13, 2005, as the date Ms. Gilmore was sentenced to 10 years of community supervision, and proposed finding of fact no. 4 references April 13, 2005, as the date Ms. Gilmore was sentenced to 5 years' incarceration. Both findings contain a technical error in the year referenced.

Under "Background," the "Discussion" portion of Exhibit A states "On April 13, 2006, the court sentenced Ms. Gilmore to 10 years of deferred adjudication..." and "On April 13, 2006, the court sentenced Ms. Gilmore to incarceration for 5 years..." Additionally, during direct examination in the hearing, counsel for TDI asked "It was April 13th of '06, you pled guilty to aggravated robbery and were sentenced to five years?" to which Ms. Gilmore replied "Yes." Finally, TDI's exhibit no. 4, admitted during the hearing, states that the date of judgement for Ms. Gilmore and the date she was sentenced to 10 years of community supervision was "4/13/06."

Based on these factors, it is apparent that the references to April 13, 2005, in finding of fact no. 2 and finding of fact no. 4 are technical errors that should be changed.

In Exhibit A, proposed finding of fact no. 6 references April 9, 2010, as the date Ms. Gilmore was released from prison and placed on parole. This finding contains a technical error in the year referenced.

Under "Background," the "Discussion" portion of Exhibit A states "On April 9, 2009, Ms. Gilmore was released on parole..." Additionally, during direct examination in the hearing, counsel for TDI asked "And you went to T.D.C. from May 11th of '06 to April 9th of 2009?" to which Ms. Gilmore replied "Yes, sir; that's correct." Finally, TDI's exhibit no. 4 states that Ms. Gilmore was released on parole "04-09-09."

Based on these factors, it is apparent that the references to April 9, 2010, as the date Ms. Gilmore was released from prison and placed on parole in finding of fact no. 6 is a technical error that should be changed.

Findings of Fact

1. The findings of fact contained in Exhibit A, excluding finding of fact no. 2, finding of fact no. 4, and finding of fact no. 6, are adopted by TDI and incorporated by reference into this order.
2. In place of finding of fact no. 2 as proposed in Exhibit A, TDI adopts the following corrected finding:

Ms. Gilmore pleaded guilty to the offense, and on April 13, 2006, in Cause No. F-056642-W, in the 363rd Judicial District Court of Dallas County, Texas, Ms. Gilmore was sentenced to 10 years of community supervision. The court deferred adjudicating her guilt at that time.

3. In place of finding of fact no. 4 as proposed in Exhibit A, TDI adopts the following corrected finding:

Ms. Gilmore pleaded guilty to the offense, and on April 13, 2006, in Cause No. F-0573271-KW, in the 363rd Judicial District Court of Dallas County, Texas, Ms. Gilmore was sentenced to 5 years' incarceration in the Texas Department of Criminal Justice, Huntsville, Texas. The sentences in her two cases were to run concurrently.

4. In place of finding of fact no. 6 as proposed in Exhibit A, TDI adopts the following corrected finding:

On April 9, 2009, Ms. Gilmore was released from prison and placed on parole. On August 31, 2010, she was released from parole.

Conclusions of Law

1. The conclusions of law contained in Exhibit A are adopted by TDI and incorporated by reference into this order.
3. Proposed findings of fact no. 2, no. 4, and no. 6 as contained in Exhibit A include technical errors that should be changed. Tex. Gov. Code § 2001.058(e).

2018- 5781

COMMISSIONER'S ORDER
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Order

It is ordered that Michelle Annette Gilmore's application for an adjuster all lines license is denied.



Kent C. Sullivan
Commissioner of Insurance



Lesli G. Ginn
Chief Administrative Law Judge

July 9, 2018

Kent Sullivan
Commissioner of Insurance
Texas Department of Insurance
333 Guadalupe, Tower 1, 13th Floor, Mail Code 113-2A
Austin, Texas 78714

VIA INTERAGENCY

RE: Docket No. 454-18-2235.C; Texas Department of Insurance v. Michelle Annette Gilmore

Dear Commissioner Sullivan:

Please find enclosed a Proposal for Decision in this case. It contains my recommendation and underlying rationale.

Exceptions and replies may be filed by any party in accordance with 1 Tex. Admin. Code § 155.507(c), a SOAH rule which may be found at www.soah.texas.gov.

Sincerely,

A handwritten signature in black ink that reads "Fernando Rodriguez".

Fernando Rodriguez
Administrative Law Judge

FR/eh
Enclosure

cc: Patrick Quigley, Staff Attorney, Texas Department of Insurance, 333 Guadalupe, Tower, 13th Floor, Austin, Texas 78701 **VIA INTERAGENCY**
Michelle Annette Gilmore, 3913 Gannon Lane, Apartment 524, Dallas, Texas 75237 - **VIA REGULAR MAIL**

SOAH DOCKET NO. 454-18-2235.C

**TEXAS DEPARTMENT
OF INSURANCE,
Petitioner**

v.

**MICHELLE ANNETTE GILMORE,
Applicant**

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

PROPOSAL FOR DECISION

The staff (Staff) of the Texas Department of Insurance (Department) seeks to deny the application of Michelle Annette Gilmore for an adjuster–all lines license based on her criminal history. After considering the evidence and the applicable law, the Administrative Law Judge (ALJ) recommends the Department deny Ms. Gilmore’s license application.

I. PROCEDURAL HISTORY, NOTICE, AND JURISDICTION

The hearing in this case was held on April 11, 2018, before ALJ Fernando Rodriguez at the State Office of Administrative Hearings in Austin, Texas. Staff was represented by staff attorney Patrick Quigley. Ms. Gilmore appeared and represented herself. The hearing concluded the same day. On April 19, 2018, Staff filed a copy of Ms. Gilmore’s third application for an adjuster–all lines license, filed by Ms. Gilmore on October 23, 2017.¹ On May 9, 2018, the Department’s Chief Clerk filed a copy of the transcript on this case and the record closed on that day. Notice and jurisdiction were not disputed and are set out in the Findings of Fact and Conclusions of Law below.

¹ The exhibit was marked as Staff Exhibit 1A and is hereby admitted into the record. Ms. Gilmore’s first submitted application was admitted as Staff Exhibit 1. However, the Department requested additional information from Ms. Gilmore, and she ultimately submitted another two applications. At the request of the ALJ, Staff filed Ms. Gilmore’s third application with the State Office of Administrative Hearings. The only difference between the applications is a different address in Exhibit 1A.

II. DISCUSSION

A. Background

Ms. Gilmore has one conviction and one deferred adjudication in her criminal history. In July 2005, Ms. Gilmore was indicted by a Dallas County Grand Jury for the first-degree felony offense of aggravated robbery with a deadly weapon.² The indictment states that, on or about August 14, 2005, Ms. Gilmore, Brandon Knight, and Marvin Pickens were involved in the armed robbery of Obed Vilchis. Thereafter, in Cause No. F-056642-W, in the 363rd Judicial District Court of Dallas County, Texas, Ms. Gilmore pled guilty.³ On April 13, 2006, the court sentenced Ms. Gilmore to 10 years of deferred adjudication but did not adjudicate her guilt at that time.⁴ She was also fined \$800 and ordered to pay a \$60 per month probation fee when placed on probation. Similarly, in July 2005 a Dallas County Grand Jury indicted Mr. Gilmore for the first-degree felony offense of aggravated robbery with a deadly weapon.⁵ The indictment states that, on or about August 17, 2005, Ms. Gilmore and Marvin Pickens were involved in the armed robbery of Jo Corpus. Thereafter, in Cause No. F-0573271-KW, in the 363rd Judicial District Court of Dallas County, Texas, Ms. Gilmore pled guilty.⁶ On April 13, 2006, the court sentenced Ms. Gilmore to incarceration for 5 years in the Texas Department of Criminal Justice, Institutional Division (TDCJ), Huntsville, Texas, and assessed court costs of \$223. The sentences in both cases were to run concurrently.⁷

On April 9, 2009, Ms. Gilmore was released on parole, and on August 31, 2010, she was discharged from parole.⁸ On April 13, 2016, Ms. Gilmore was discharged from community

² Staff Ex. 4 at 8.

³ Staff Ex. 4 at 9.

⁴ Staff Ex. 4 at 9.

⁵ Staff Ex. 4 at 1.

⁶ Staff Ex. 4 at 2.

⁷ Staff Ex. 4 at 2.

⁸ Staff Ex. 4 at 6.

supervision in Cause No. F0556642-W after having successfully served her 10-year term of community supervision.⁹ As a result, all charges against her in that case were dismissed.

Ms. Gilmore applied for an adjuster-all lines license on January 17, 2017. Staff requested additional information, including a permanent address and details of Ms. Gilmore's criminal history.¹⁰ On July 28, 2017, the Department proposed to deny her application, and Ms. Gilmore requested a hearing on August 8, 2017. Ms. Gilmore's final and complete application (with her then-current address) was filed on October 23, 2017.¹¹

B. Applicable Law

The Department may deny a license to an applicant who has been convicted of an offense that directly relates to the duties and responsibilities of the licensed occupation.¹² Further, the Department may deny a license to someone who has been convicted of a felony.¹³ The factors to be considered in determining whether a conviction directly relates to the occupation are:

1. the nature and seriousness of the crime;
2. the relationship of the crime to the purposes for requiring a license to engage in the occupation;
3. the extent to which a license might offer an opportunity to engage in further criminal activity of the same type as that in which the person previously had been involved; and
4. the relationship of the crime to the ability, capacity, or fitness required to perform the duties and discharge the responsibilities of the licensed occupation.¹⁴

⁹ Staff Ex. 4 at 15.

¹⁰ Staff Ex. 2 at 1 at 17; Staff Ex. 2; Staff Ex. 3.

¹¹ Staff Ex. 1A.

¹² Tex. Occ. Code § 53.021(a).

¹³ Tex. Ins. Code § 4005.101(b)(8).

¹⁴ Tex. Occ. Code § 53.022.

In determining the fitness to perform the duties and responsibilities of the licensed occupation of a person who has been convicted of a crime, the licensing authority must also consider the following factors:

1. the extent and nature of the person's past criminal activity;
2. the age of the person when the crime was committed;
3. the amount of time that has elapsed since the person's last criminal activity;
4. the conduct and work activity of the person before and after the criminal activity;
5. evidence of the person's rehabilitation or rehabilitative effort while incarcerated or following release;
6. other evidence of the person's present fitness, including letters of recommendation from:
 - a. prosecutors and law enforcement and correctional officers who prosecuted, arrested, or had custodial responsibility for the person;
 - b. the sheriff or chief of police in the community where the person resides; and
 - c. any other persons in contact with the convicted person; and
7. proof furnished by the applicant that the applicant has:
 - a. maintained a record of steady employment;
 - b. supported the applicant's dependents;
 - c. maintained a record of good conduct; and
 - d. paid all outstanding court costs, supervision fees, fines, and restitution ordered in any criminal case in which the applicant or holder has been convicted.¹⁵

¹⁵ Tex. Occ. Code § 53.023. The Department has adopted these factors in its guidelines. 28 Tex. Admin. Code § 1.502(h).

The Department has developed guidelines relating to matters it will consider in determining whether to grant a license if the applicant has been convicted of a crime. The crimes that the Department considers to be of such a serious nature that they are of prime importance in determining fitness for licensure include robbery as described by Texas Penal Code, Chapter 29.¹⁶

C. Evidence

Staff offered 11 exhibits, all of which were admitted. These exhibits included Ms. Gilmore's applications, along with information she provided about her conviction and deferred adjudication, and two letters of recommendation. Staff called one witness, Lewis Weldon Wright IV, Manager of Continuing Education and Administrative Review for the Department. Ms. Gilmore testified on her own behalf. Although Ms. Gilmore did not offer any exhibits at the hearing, the record was held open for Staff to provide an additional exhibit, Ms. Gilmore's third application, dated October 23, 2017. The exhibit was labeled Staff Exhibit 1A and is hereby admitted into the record.

1. Testimony of Mr. Wright

Mr. Wright testified that Ms. Gilmore's application was referred to his section because of Ms. Gilmore's criminal history. Mr. Wright stated that a complete application is a prerequisite to Department review. In Ms. Gilmore's case, she initially submitted an incomplete application on January 17, 2017. Although she truthfully answered that she had been convicted of a felony or misdemeanor, and truthfully answered that she had adjudication deferred on a felony, she did not attach the required documentation related to those incidents. That information was requested in correspondence from the Department dated March 8, 2017.¹⁷ Ms. Gilmore subsequently provided some of the material requested. Mr. Wright testified that 28 Texas Administrative

¹⁶ 28 Tex. Admin. Code § 1.502(e)(4)(D). Texas Penal Code § 29.03 specifically references aggravated robbery, which is defined as robbery with a deadly weapon. The Department amended its rules, effective September 8, 2010. The citations in this proposal for decision are to the rules in effect on April 6, 2010, the date of Ms. Gilmore's conviction. However, the rules that apply directly to this case remained unchanged.

¹⁷ Staff Ex. 3.

Code § 1.502 requires the Department to provide special consideration to certain crimes and, when those particular crimes are implicated, the Department has the authority under Chapter 4005 of the Texas Insurance Code to deny an application.¹⁸ Further, when a potential licensee has a criminal history, the Department reviews the application through the lens of the criteria outlined in Texas Occupations Code (Occupations Code) § 52.021-.023.¹⁹ In Ms. Gilmore's case, the Department requested certain specific information, only some of which was provided by Ms. Gilmore.

The Department requested three letters of recommendation from either family members, clergy, or other persons with knowledge of the applicant. In this case, Ms. Gilmore only provided two letters; one from a friend²⁰ and one from her sister.²¹ Although Ms. Gilmore has the burden to provide letters from law enforcement personnel familiar with her case(s), she failed to produce any such letters.²² Mr. Wright acknowledged that, after prompting via correspondence, Ms. Gilmore provided records of her criminal history and her parole-discharge records. Mr. Wright also acknowledged that Ms. Gilmore took, and passed, the Texas All Lines Adjuster examination.²³ In addition, Mr. Wright took into consideration that, at the time of the offense, Ms. Gilmore was approximately 22 years old, was approximately 34 years old at the time of the hearing, and had no prior criminal history other than the offense in question. Similarly, Mr. Wright testified that he was aware that Ms. Gilmore was currently employed and appeared to have been so for several years.

Mr. Wright testified that, after review of all the information provided by Ms. Gilmore, the Department had to perform a balancing analysis between the positive attributes presented by the applicant, and the serious nature of her particular criminal offense.²⁴ This analysis was

¹⁸ Tr. at 22.

¹⁹ Adopted in 28 Tex. Admin. Code § 1.502(h).

²⁰ Staff Ex. 6 at 1.

²¹ Staff Ex. 6 at 2.

²² Tr. at 25. Tex. Occ. Code § 53.023(b).

²³ Staff Ex. 1 at 16.

²⁴ Tr. at 25.

conducted by analyzing the criteria in Occupations Code § 53.021-.023 as adopted in Department rule 28 Texas Administrative Code § 1.502(h). In this case, Mr. Wright expressed grave concern regarding Ms. Gilmore's criminal conviction for aggravated robbery with a deadly weapon, which in this case was a handgun. Mr. Wright explained that Ms. Gilmore's offense is particularly concerning because it is a directly-related crime involving fraud, dishonesty, or deceit, and is a specifically referenced offense in the Department's rules.²⁵ Moreover, Ms. Gilmore was only released from community supervision in 2016. In view of the facts, Mr. Wright testified that Ms. Gilmore was not a good candidate for licensure as an adjuster—all lines.

2. Testimony of Ms. Gilmore

During her testimony, Ms. Gilmore admitted that she pleaded guilty to the two offenses of aggravated robbery with a deadly weapon. In a plea bargain, she was given deferred adjudication for one of the offenses that was served concurrently with the five-year sentence of incarceration in TDCJ in the other case. Ms. Gilmore admitted that, while employed as an armed security officer in 2005, she gave a male friend the combination to the gun safe in her home.²⁶ She also admitted that she purchased two handguns for the two men who were later involved in the two armed robberies for which she was indicted. According to Ms. Gilmore, she did not know the guns would be used to rob people. She testified that, at least for one of the men, she thought she was buying a gun for his personal protection.

During cross-examination, Ms. Gilmore said that she never robbed anyone, and all she did was drive the two men while *they* robbed people. When asked by the ALJ what she thought the two men were doing while she drove the car, she testified that she thought one of the men was picking up some clothes, which avoided the question.²⁷ On further questioning from Staff, Ms. Gilmore admitted that she informed her probation officer she was present for the planning of

²⁵ 28 Tex. Admin. Code § 1.502(d), (e)(1), (4)(D).

²⁶ Tr. at 34.

²⁷ Tr. at 38.

the robberies, and she admitted being the get-away driver.²⁸ Ms. Gilmore finished her testimony by stating that she understood what she did was wrong, but she would like a second chance to improve her condition for her own benefit as well as that of her daughter and two grandchildren who live with her.²⁹ At the present time, she is employed by Dolco Tekni-Plex, where she is a machine operator and a quality inspector.

D. Analysis

Under chapter 53 of the Texas Occupations Code, the Department may deny Ms. Gilmore's license application because of her convictions, which are directly related to the licensed occupation.³⁰ Pursuant to 28 Texas Administrative Code § 1.502, the Department considered the factors listed in Texas Occupations Code §§ 53.022 and 53.023, set out above, in determining whether to grant Ms. Gilmore's license application.

Ms. Gilmore was convicted of aggravated robbery with a deadly weapon, which is a very serious offense. While she was young at the time of her offense and conviction, she was 22 years old and not a minor. In addition, at the time of her offense in 2005, Ms. Gilmore was an armed security guard, who should have understood the danger of mishandling weapons. Here, Ms. Gilmore not only gave a male friend the combination to the gun safe in her home, she purchased two handguns for two male friends that were ultimately used in the two armed robberies in which she participated and for which she was indicted. Ms. Gilmore has been out of prison for 9 years but was only discharged from community supervision in 2016. She is currently employed and appears to have been employed for at least the last 4 years.

There is little to no evidence of Ms. Gilmore's rehabilitative work other than her Certificate of Completion for having successfully passed the Texas All Lines Adjuster Licensing examination. Ms. Gilmore provided two letters of reference. The first letter was from her sister,

²⁸ Staff Ex. 4 at 13; Tr. at 39-40.

²⁹ Tr. at 42.

³⁰ 28 Tex. Admin. Code § 1.502(e), (4)(D).

who attested that Ms. Gilmore had "shortcomings" in her earlier life, but more recently had worked for Dolco Tekni-Plex for the past 4 years. The other character letter was from a friend. Ms. Gilmore provided no letters from law enforcement familiar with her circumstances, and no letters of recommendation from her employer. The ALJ also notes that Ms. Gilmore testified that she would like to improve her situation in life to better provide for her daughter and two grandchildren who live with her.

The ALJ believes that Ms. Gilmore is sincere in wanting to improve herself and her condition. However, aggravated robbery with a deadly weapon is a very serious offense. In addition, while Ms. Gilmore testified that she understood what she did was wrong, the seriousness of the offense and the fact that she committed the offense two times in one week, weighs heavily in this balancing test. Staff expressed grave concern with granting a license to Ms. Gilmore and, after reviewing all the factors, at this time, ALJ believes that the preponderance of evidence shows that licensure is not appropriate and recommends denial of Ms. Gilmore's application for adjuster-all lines at this time.

III. FINDINGS OF FACT

1. In July 2005, Michelle Annette Gilmore was indicted by a Dallas County Grand Jury for the first-degree felony offense of aggravated robbery with a deadly weapon.
2. Ms. Gilmore pled guilty to the offense, and on April 13, 2005, in Cause No. F-056642-W, in the 363rd Judicial District Court of Dallas County, Texas, Ms. Gilmore was sentenced to 10 years of community supervision. The court deferred adjudicating her guilt at that time.
3. In July 2005, Ms. Gilmore was indicted by a Dallas County Grand Jury for the first-degree felony offense of aggravated robbery with a deadly weapon.
4. Ms. Gilmore pled guilty to the offense, and on April 13, 2005, in Cause No. F-0573271-KW, in the 363rd Judicial District Court of Dallas County, Texas, Ms. Gilmore was sentenced to 5 years' incarceration in the Texas Department of Criminal Justice, Huntsville, Texas. The sentences in her two cases were to run concurrently
5. At the time she committed the offenses, Ms. Gilmore was 22 years old. At the time of the hearing on the merits, Ms. Gilmore was 34 years old.

6. On April 9, 2010, Ms. Gilmore was released from prison and placed on parole. On August 31, 2010, she was released from parole.
7. On April 13, 2016, Ms. Gilmore was discharged from community supervision.
8. Ms. Gilmore's offense of aggravated robbery with a deadly weapon is a very serious offense.
9. On January 17, 2017, Michelle Annette Gilmore applied for an adjuster-all lines license from the Texas Department of Insurance (Department). On March 8, 2017, the Department requested additional information regarding her criminal history.
10. On July 28, 2017, the Department proposed to summarily deny Ms. Gilmore's application.
11. On August 8, 2017, Ms. Gilmore requested a hearing conducted by the State Office of Administrative Hearings to challenge the denial.
12. On February 13, 2018, the Department issued a notice of hearing on the denial of the application.
13. The notice of hearing contained a statement of the time, place, and nature of the hearing; a statement of the legal authority and jurisdiction under which the hearing was to be held; a reference to the particular sections of the statutes and rules involved; and either a short, plain statement of the factual matters asserted or an attachment that incorporates by reference the factual matters asserted in the complaint or petition filed with the state agency.
14. The hearing in this case was held on April 11, 2018, before Administrative Law Judge Fernando Rodriguez at the State Office of Administrative Hearings (SOAH) in Austin, Texas. Staff was represented by staff attorney Patrick Quigley. Ms. Gilmore represented herself. The hearing concluded the same day, and the record closed on May 9, 2018, when the Department's Chief Clerk filed the transcript of the hearing.
15. Over 13 years have passed since Ms. Gilmore last committed a crime. She has no other criminal history.
16. Ms. Gilmore has been out of prison for 9 years, and her community supervision was discharged in 2016.
17. Ms. Gilmore has worked for the past 4 years for Dolko Tekni-Plex.
18. Ms. Gilmore had two letters of recommendation, one from her sister and one from a friend.

19. Ms. Gilmore did not provide letters of recommendation from law enforcement officials familiar with her offense and circumstances.
20. The preponderance of the evidence does not show Ms. Gilmore's current fitness to hold a license.
21. The positive factors presented in the evidence do not outweigh the serious nature of Ms. Gilmore's offense at this time.

IV. CONCLUSIONS OF LAW

1. The Department has jurisdiction over this matter. Tex. Ins. Code §§ 4001.002, .105, 4005.101.
2. SOAH has authority to hear this matter and issue a proposal for decision with findings of fact and conclusions of law. Tex. Gov't Code ch. 2003; Tex. Ins. Code § 4005.104.
3. Ms. Gilmore received timely and sufficient notice of hearing. Tex. Gov't Code ch. 2001; Tex. Ins. Code § 4005.104(b).
4. The Department may deny a license to a person who has been convicted of a felony offense. Tex. Ins. Code 4005.101(b)(8).
5. The Department may deny a license if an applicant commits an offense that directly relates to the duties and responsibilities of an insurance adjuster. Tex. Occ. Code § 53.021(a)(1).
6. Ms. Gilmore has not shown the fitness required to perform the duties and discharge the responsibilities of the licensed occupation. Tex. Occ. Code §§ 53.022-.023; 28 Tex. Admin. Code § 1.502(h).
7. The Department should deny Ms. Gilmore's application for a license.

SIGNED July 9, 2018.



FERNANDO RODRIGUEZ
ADMINISTRATIVE LAW JUDGE
STATE OFFICE OF ADMINISTRATIVE HEARINGS