NORTH CAROLINA DEPARTMENT OF INSURANCE
RALEIGH, NORTH CAROLINA

STATE OF NORTH CAROLINA COUNTY OF WAKE	BEFORE THE COMMISSIONER OF INSURANCE

IN THE MATTER OF:	)	
	)	
THE LICENSURE OF	)	ORDER AND
LARRY MORRIS	)	<u>FINAL AGENCY DECISION</u>
(NPN 15932661)	)	
	)	Docket Number: 2353
	)	
Respondent.	)	
	)	

THIS MATTER came on for hearing and was heard on February 17, 2026 at 10:00 a.m., by the undersigned Hearing Officer, as designated by the North Carolina Commissioner of Insurance ("Commissioner") pursuant to N. C. Gen. Stat. § 58-2-55 and other applicable statutes and regulations. The administrative hearing was held in the North Carolina Department of Insurance's Hearing Room, Room 211, located at 3200 Beechleaf Court, Raleigh, Wake County, North Carolina.

Petitioner, the Agent Services Division of the North Carolina Department of Insurance ("Petitioner" or "Agent Services"), was represented by Assistant Attorney General Rebecca E. Lem. Respondent, Larry Morris ("Respondent") did not appear and was not represented by counsel at the hearing.

Petitioner moved, pursuant to 11 NCAC 01 .0423(a)(1), for the imposition of sanctions due to Respondent's failure to appear at the hearing. Petitioner's motion for sanctions was GRANTED; however, the undersigned Hearing Officer proceeded to hear the Petitioner's testimony and evidence in support of the underlying Petition.

Jeff Miller, Complaint Analyst with Agent Services, appeared and testified on behalf of the Petitioner.

Petitioner's Exhibits 1 through 15, and all subparts, were admitted into evidence with redactions of personally identifiable information.

The Petition for Administrative Hearing alleged that Respondent violated N.C. Gen. Stat. §§ 58-33-32(k) and 58-33-46(a)(2) for failing to timely report several adverse administrative actions received from other states, and that Respondent provided a false or misleading answer to a screening question on his 2023 license application, which constitutes grounds for disciplinary action against his license pursuant to N.C. Gen. Stat. § 58-33-46(a)(1).

BASED UPON careful consideration of the documentary and testimonial evidence presented at the hearing, and upon the entire record in the proceeding, the undersigned Hearing Officer hereby makes the following Findings of Fact and Conclusions of Law:

FINDINGS OF FACT

1. The North Carolina Department of Insurance ("NCDOI") is a state agency responsible for enforcement of the insurance laws of North Carolina and for regulating and licensing insurance producers, in accordance with Chapter 58 of the North Carolina General Statutes. Agent Services is a division of the NCDOI.

2. Respondent holds a nonresident North Carolina insurance producer license, National Producer Number 15932661, with lines of authority in Property and Casualty ("License"). Respondent's License was first issued in North Carolina on January 26, 2023. *See* Pet'r's Ex. 4. Respondent is a resident of Pennsylvania. *Id.*

3. Pursuant to 11 NCAC 06A .0101(a)(2), Agent Services is the division of the North Carolina Department of Insurance responsible for the licensing, education, and regulation of Agents. Pursuant to N.C. Gen. Stat. § 58-33-10(1), an "agent" is defined as a person licensed to solicit applications for, or to negotiate a policy of, insurance. Pursuant to N.C. Gen. Stat. § 58-33-10(7), an "insurance producer" or "producer" means a person required to be licensed under Article 33 of Chapter 58 of the North Carolina General Statutes to sell, solicit, or negotiate insurance, and "insurance producer" or "producer" includes an agent and a broker. As a licensed insurance producer, Respondent is considered an "agent" as defined by statute and is therefore subject to the licensing, education, and regulation of Agent Services. *See* N.C. Gen. Stat. §§ 58-33-10(1), 58-33-10(7) and 11 NCAC 06A .0101(a)(2).

4. On January 9, 2026, copies of the Notice of Administrative Hearing and Petition for Administrative Hearing were deposited in the United States Postal Service, via both first-class mail and certified mail, return receipt requested. Service was directed to Respondent's residential address of record pursuant to N.C. Gen. Stat. §§ 58-2-69(b),(d) and (e), 150B-38(c), and Rule 4 of the North Carolina Rules of Civil Procedure. *See* Pet'r's Exs. 1 and 3. The certified mail to Respondent's residential address was unclaimed and returned to sender, and the first-class mail was not returned. *See* Pet'r's Ex. 3.

5. Respondent previously held a resident North Carolina insurance producer license that was first issued on or about August 4, 2010. *See* Pet'r's Ex. 4.

On December 1, 2011, Respondent voluntarily surrendered this insurance producer license. *Id.*

6. On January 23, 2023, Respondent submitted a license application ("2023 License Application") to the NCDOI for a nonresident insurance producer license in which he answered "No" to Screening Question # 2 which asked, "Have you ever been named or involved as a party in an administrative proceeding, including FINRA sanction or arbitration proceeding regarding any professional or occupational license?" *See* Pet'r's Ex. 6.

7. On June 3, 2014, the Arkansas State Insurance Department revoked Respondent's nonresident insurance producer license due to Respondent's failure to disclose a February 13, 2013 administrative action from Ohio ("2014 Arkansas administrative action"). *See* Pet'r's Exs. 8 and 11.

8. At the time Respondent received the 2014 Arkansas administrative action, he did not hold a North Carolina insurance producer license. However, this administrative action should have been disclosed on his 2023 License Application. Respondent's answer of "No" in response to Screening Question # 2 which asked if he had been a party to an administrative proceeding regarding any professional or occupational license was untrue. *See* Pet'r's Ex. 6.

9. A licensee is obligated to submit a license application to become an insurance producer that is materially correct, not misleading, complete, and materially true. *See* N.C. Gen. Stat. § 58-33-46(a)(1). On January 23, 2023, Respondent provided materially incorrect and materially untrue information in the nonresident insurance producer license application when he indicated that he had not been a party to an administrative proceeding regarding any professional or occupational license.

10. The National Insurance Producer Registry ("NIPR") Attachment Warehouse shows that Respondent eventually uploaded documents related to the 2014 Arkansas administrative action on March 24, 2023. See Pet'r's Ex. 9. Respondent did not submit the documentation to the NCDOI until two months after the submission of his 2023 License Application.

11. After Respondent obtained his nonresident North Carolina insurance producer license on January 23, 2023, he received several administrative actions from other states, including the following:

a. A license denial from the Indiana Department of Insurance effective on June 20, 2023 ("2023 Indiana administrative action"). *See* Pet'r's Exs. 8 and 13.

b. A license revocation from the Louisiana Department of Insurance effective on or about December 25, 2023 ("2023 Louisiana administrative action"). *See* Pet'r's Exs. 8 and 14.

c. A "Forfeiture Assessment" (monetary penalty) from the Wisconsin Department of Insurance effective on March 8, 2024 for failure to timely report another states' administrative action ("March 2024 Wisconsin administrative action"). *See* Pet'r's Exs. 8 and 15.

d. A license revocation from the Wisconsin Department of Insurance effective July 25, 2024 for failure to pay the monetary penalty from its prior administrative action ("July 2024 Wisconsin administrative action"). *See* Pet'r's Exs. 8 and 15.

12. A licensee is obligated to report any administrative action taken against the licensee to the NCDOI within 30 days of the action's final disposition. *See* N.C. Gen. Stat. § 58-33-32(k). This report must include a copy of the order or consent order and any other information or documents filed in the proceeding necessary to describe the action. *Id.* A licensee may report an administrative action by uploading a copy of the administrative action to the NIPR Attachment Warehouse or reporting it directly to the NCDOI via mail, email, or fax.

13. For each of the administrative actions that Respondent received as set forth in Paragraph 11, *supra*, Agent Services opened an enforcement case file and attempted to contact Respondent by sending him correspondence. Agent Services opens an enforcement case file when it has reason to believe that a licensee may have violated North Carolina insurance laws or regulations. Respondent failed to report any of the administrative actions set forth in Paragraph 11, *supra*, to the NCDOI or via the NIPR Attachment Warehouse within thirty (30) days as required by N.C. Gen. Stat. § 58-33-32(k).

14. Per Agent Services' standard procedure, correspondence was sent by Agent Services to Respondent in each of the administrative actions set forth in Paragraph 11, *supra*, advising Respondent of the thirty (30) day reporting requirement of N.C. Gen. Stat. § 58-33-32(k) for administrative actions and requesting a response from Respondent.

15. Jeff Miller ("Mr. Miller"), Complaint Analyst with Agent Services, reviewed each of the prior enforcement case files and noted that in each case, Respondent did not respond to any of the correspondence sent by Agent Services. Mr. Miller also noted that because Respondent did not hold appointments in North Carolina at that time, per Agent Services' policy as a matter of efficiency and resource allocation, Agent Services closed each of those enforcement case files with a "stop block". *See* Pet'r's Ex. 7. Agent Services' action in closing each of the respective

enforcement case files with a "stop block" does not preclude Agent Services pursuing administrative action for the allegations noted in each enforcement case file.

16. On or about February 6, 2025, Agent Services became aware, via a Personalized Information Capture System alert ("PIC alert"), which is generated from an automatic notification system through the National Association of Insurance Commissioners ("NAIC"), that Respondent had received an administrative action from Delaware. *See* Pet'r's Exs. 7 and 8.

17. Mr. Miller was assigned to investigate the administrative action against Respondent that the Delaware Department of Insurance ("Delaware") entered into NAIC on January 30, 2025. *See* Pet'r's Exs. 7 and 8. Agent Services obtained a certified copy of the Final Decision and Order issued by Delaware. *See* Pet'r's Ex. 12. On January 14, 2025, Delaware revoked Respondent's producer license and issued a monetary penalty for failure to timely report another states' administrative action ("Delaware administrative action"). *Id.*

18. During Mr. Miller's investigation, he reviewed the records of Agent Services and the NIPR Attachment Warehouse and noted that Respondent had not reported the Delaware administrative action. Mr. Miller also noted that Respondent had several prior administrative actions, the majority of which were not timely reported in violation of N.C. Gen. Stat. § 58-33-32(k). *See* Pet'r's Exs. 7 and 9.

19. Mr. Miller proceeded with his investigation into Respondent's unreported Delaware administrative action, as well as his apparent violations of N.C. Gen. Stat. § 58-33-32(k) in relation to the 2023 Indiana administrative action, the 2023 Louisiana administrative action, the March 2024 Wisconsin administrative action, and the July 2024 Wisconsin administrative action. Mr. Miller also determined that Respondent had failed to disclose his 2014 Arkansas administrative action on his 2023 License Application in apparent violation of N.C. Gen. Stat. § 58-33-46(a)(1).

20. Mr. Miller's investigation revealed that Respondent uploaded a large number of documents to the NIPR Attachment Warehouse on various dates between September 8, 2010 and October 16, 2025, most of which related to a prior criminal conviction that was properly disclosed on his 2023 License Application. *See* Pet'r's Ex. 9. A review of these documents shows that Respondent did not report the 2023 Indiana administrative action, the 2023 Louisiana administrative action, the March 2024 Wisconsin administrative action, the July 2024 Wisconsin administrative action, or the Delaware administrative action within thirty (30) days of the respective dates of those administrative actions through the NIPR Attachment Warehouse. *Id.* Furthermore, Respondent did not report any of these administrative actions directly to the NCDOI, despite requests made by Agent Services to Respondent to do so.

21. On February 10, 2025 and February 20, 2025, Mr. Miller sent Respondent emails informing Respondent that Agent Services was aware of the unreported 2023 Indiana administrative action, 2023 Louisiana administrative action, March 2024 Wisconsin administrative action, July 2024 Wisconsin administrative action, and Delaware administrative action. *See* Pet'r's Exs. 10a and 10b. Furthermore, this correspondence noted Respondent's failure to disclose his 2014 Arkansas administrative action on his 2023 License Application pursuant to of N.C. Gen. Stat. § 58-33-46(a)(1). *Id.* Respondent was instructed to provide Agent Services with a written response and documentation within ten days. *Id.* Respondent failed to provide any response to either of these emails.

22. On March 12, 2025, Mr. Miller sent correspondence via first-class mail to Respondent's residential address of record and via email to Respondent's email address of record requesting that Respondent attend an informal conference to discuss his failure to timely report the 2023 Indiana administrative action, the 2023 Louisiana administrative action, the March 2024 Wisconsin administrative action, the July 2024 Wisconsin administrative action, and the Delaware administrative action within thirty (30) days of the respective dates of those administrative actions, as well as his failure to disclose his 2014 Arkansas administrative action on his 2023 License Application. The informal conference notice was scheduled for Respondent on April 15, 2025 at 11:00 a.m. eastern time via the telephone. *See* Pet'r's Exs. 10c and 10d.

23. At the appointed time for the April 15, 2025 informal telephonic conference, Respondent attended along with Mr. Miller and his supervisor, Nadine Scott. During the informal conference, Mr. Miller and Nadine Scott gave Respondent options on how he could proceed regarding his apparent violations, including options whereby he could avoid an administrative hearing. Respondent was asked to advise Agent Services on how he would like to proceed. Respondent indicated that he was not selling in North Carolina anymore and Mr. Miller had the impression that Respondent did not have an interest in retaining his North Carolina license. *See* Pet'r's Ex. 7. Respondent failed to provide a follow-up response to Agent Services.

24. On May 21, 2025, Mr. Miller sent correspondence via first-class mail to Respondent's residential address of record and via email to Respondent's email address of record advising Respondent that formal proceedings would be instituted under Article 3A of Chapter 150B and an administrative hearing would be scheduled in Raleigh, North Carolina at a time and date to be determined. *See* Pet'r's Ex. 10e. Respondent failed to provide any response to this correspondence.

25. Copies of the 2023 Indiana administrative action, the 2023 Louisiana administrative action, the March 2024 Wisconsin administrative action, the July 2024 Wisconsin administrative action, and the Delaware administrative action were admitted into evidence. *See* Pet'r's Exs. 12-15.

26. N.C. Gen. Stat. § 58-33-82(d) states that, "Except as provided in subsection (e) of this section, only agents who are duly licensed with appropriate company appointments, limited lines producers, or licensed limited representatives may directly accept any commission, fee, or other valuable consideration for the sale, solicitation, or negotiation of insurance." Respondent does not hold any appointments in North Carolina and has indicated to Agent Services that he is not currently doing business in North Carolina. *See* Pet'r's Exs. 5 and 7.

27. As of the date of the hearing in this matter, Respondent failed to report the administrative actions set forth in Paragraph 25, *supra*, via the NIPR Attachment Warehouse or directly to the NCDOI despite having been advised of this requirement several times.

28. Agent Services requests a revocation of Respondent's nonresident North Carolina insurance producer license based on his repeated failure to comply with the requirements of N.C. Gen. Stat. § 58-33-32(k), his failure to accurately answer the screening question on his 2023 License Application regarding whether he had received prior administrative actions, Respondent's own statement that he was not selling business in North Carolina, and Respondent's apparent disinterest in retaining his nonresident North Carolina insurance producer license.

CONCLUSIONS OF LAW

1. This matter is properly before the Commissioner. The Commissioner has jurisdiction over the parties and the subject matter pursuant to Chapter 58 of the North Carolina General Statutes.

2. Respondent was properly served with the Notice of Administrative Hearing ("Notice") and Petition for Administrative Hearing ("Petition") in this matter pursuant to N.C. Gen. Stat. §§ 58-2-69(d) and (e) and Rule 4 of the North Carolina Rules of Civil Procedure. Service of the Notice and Petition to Respondent's residential address of record was deemed complete on or about January 13, 2026. *See* Pet'r's Exs. 1 and 3.

3. N.C. Gen. Stat. § 58-33-46(a)(1) provides that the Commissioner may place on probation, suspend, revoke or refuse to issue or renew any license issued under Article 58 of the North Carolina General Statutes for a licensee providing materially incorrect, misleading, incomplete, or materially untrue information in the license application.

4. Respondent's answer of "No" to Screening Question # 2 which asked, "Have you ever been named or involved as a party in an administrative proceeding, including FINRA sanction or arbitration proceeding regarding any professional or

occupational license?" was a materially incorrect and untrue answer as Respondent had received a license revocation from the Arkansas State Insurance Department in 2014.

5. N.C. Gen. Stat. § 58-33-32(k) requires an insurance producer to report to the Commissioner any administrative action taken against the producer in another state within 30 days after the final disposition of the matter and to include a copy of the order or consent order and other information or documents filed in the proceeding necessary to describe the action.

6. Respondent's failure to report and provide a copy of the 2023 Indiana administrative action (effective on June 20, 2023), the 2023 Louisiana administrative action (effective on or about December 25, 2023), the March 2024 Wisconsin administrative action (effective on March 8, 2024), the July 2024 Wisconsin administrative action (effective on July 25, 2024), and the Delaware administrative action (effective on January 14, 2025) within thirty (30) days of each action's final disposition are violations of N.C. Gen. Stat. § 58-33-32(k). This omission persisted despite numerous requests from Agent Services.

7. N.C. Gen. Stat. § 58-33-46(a)(2) allows the Commissioner to place on probation, suspend, or revoke the license of a licensee who has violated any insurance law of this or any other state, violated any administrative rule, subpoena, or order of the Commissioner or of another state's insurance regulator, or violated any rule of FINRA.

8. Respondent's nonresident insurance producer license is subject to disciplinary action due to Respondent's violations of N.C. Gen. Stat. § 58-33-32(k) for failing to timely report the 2023 Indiana administrative action, the 2023 Louisiana administrative action, the March 2024 Wisconsin administrative action, the July 2024 Wisconsin administrative action, and the Delaware administrative action within thirty (30) days of each action's final disposition.

9. Respondent's violation of N.C. Gen. Stat. § 58-33-46(a)(1), by itself, is sufficient grounds to support suspension or revocation of Respondent's nonresident insurance producer license.

10. Respondent's violation of N.C. Gen. Stat. § 58-33-46(a)(2), by itself, is also sufficient grounds to support suspension or revocation of Respondent's nonresident insurance producer license.

11. Respondent's offenses are further aggravated by Respondent's repeated failure to comply with N.C. Gen. Stat. § 58-33-32(k) despite numerous requests from Agent Services. Additionally, the NIPR Attachment Warehouse reflects Respondent's awareness of how to upload documents there. Respondent has not shown a continuing

interest in retaining his nonresident North Carolina insurance producer license.

12. Based on the evidence received and the applicable law, the undersigned Hearing Officer concludes that Respondent's nonresident North Carolina insurance producer should be revoked pursuant to N.C. Gen. Stat. §§ 58-33-46(a)(1) and 58-33-46(a)(2).

BASED UPON the foregoing Findings of Fact and Conclusions of Law, the Hearing Officer enters the following:

ORDER

It is ORDERED that Respondent's nonresident insurance producer license issued by the North Carolina Department of Insurance is hereby **REVOKED.**

This Order is effective three (3) days from the date of mailing this Order. The "date of mailing" is the date indicated on the Certificate of Service attached to this Order.

This the 24th day of June, 2026.

[redacted]

Hearing Officer
N.C. Department of Insurance

APPEAL RIGHTS

This is a Final Agency Decision issued under the authority of N.C. Gen. Stat. § 150B, Article 3A.

Under the provisions of N.C. Gen. Stat. § 150B-45, any party wishing to appeal a final decision of the North Carolina Department of Insurance must file a Petition for Judicial Review in the Superior Court of the county where the person aggrieved by the administrative decision resides, or in the case of a person residing outside the State, the county where the contested case which resulted in the final decision was filed. The appealing party must file the petition within 30 days after being served with a written copy of the Order and Final Agency Decision. In conformity with 11. NCAC 01.0413 and N.C. Gen. Stat. § 1 A-1, Rule 5, this Order and Final Agency Decision was served on the parties on the date it was placed in the mail as indicated by the date on the Certificate of Service attached to this Order and Final Agency Decision. N.C. Gen. Stat. § 150B-46 describes the contents of the Petition, including explicitly stating what exceptions are taken to the decision or procedure and what relief the petitioner Seeks, and requires service of the Petition by personal service or by certified mail upon all who were parties of record to the administrative proceedings. The mailing address to be used for service on the Department of Insurance is: A. John Hoomani, General Counsel, 1201 Mail Service Center, Raleigh, NC 27699-1201.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing **ORDER AND FINAL AGENCY DECISION** by mailing a copy of the same via certified U.S. Mail, return receipt requested; via first class U.S. mail to the Respondent, at the address provided to the Commissioner pursuant to N.C. Gen. Stat. § 58-2-69(b); via courtesy email to Respondent; and via State Courier and courtesy email to Attorney for Petitioner, addressed as follows:

LARRY MORRIS
6542 N Woodstock St
Philadelphia, PA 19138
l.grant.morris@gmail.com
(Respondent)

Certified Mail Tracking Number: 9589 0710 5270 3764 5813 55

Rebecca E. Lem
Assistant Attorney General
N.C. Department of Justice
Insurance Section
9001 Mail Service Center
Raleigh, NC 27699-9001
rlem@ncdoj.gov
(Attorney for Petitioner)

This the 24th day of June, 2026.

[redacted]

Raheema I. Moore
Clerk of Court for Administrative Hearings
Paralegal III
N.C. Department of Insurance
1201 Mail Service Center
Raleigh, NC 27699-1201