

<b>MISSOURI STATE BOARD OF EDUCATION AGENDA ITEM:</b> CONSIDERATION TO DISCIPLINE THE LICENSE TO TEACH OF STEPHANIE KEYS, CASE # HR 14-030	<b>December 2014</b>
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<b>STATUTORY AUTHORITY:</b>  Section 168.071, RSMo	<input type="checkbox"/> Consent Item <input checked="" type="checkbox"/> Action Item <input type="checkbox"/> Report Item
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**DEPARTMENT GOAL NO. 3:**

Missouri will prepare, develop, and support effective educators.

**SUMMARY:**

Stephanie Keys, Respondent, holds an initial professional class certificate in the areas of elementary education, grades 1 to 6, and early childhood education, birth to grade 3, which expired June 25, 2013.

In July 2011, Respondent pled guilty in the Johnson County Circuit Court to two felony counts of commission of a fraudulent insurance act. Respondent was given a suspended imposition of sentence of five (5) years supervised probation and two days of shock time in jail. In July 2006, Respondent’s initial professional class certification was revoked by the State Board of Education due to a guilty plea to a misdemeanor charge for stealing.

Respondent received notice of a hearing on this matter, but was not present either personally or through counsel.

**PRESENTER(S):**

Mark Allan Van Zandt, General Counsel, will participate in the presentation and discussion of this agenda item.

**RECOMMENDATION:**

It is recommended that the State Board of Education revoke Respondent’s teaching certificate pursuant to its authority under Mo. Rev. Stat. § 168.071 (Supp. 2013).

**BEFORE THE STATE BOARD OF EDUCATION  
STATE OF MISSOURI**

<b>IN THE MATTER OF:</b>	)	
	)	
<b>Department of Elementary and Secondary Education,</b>	)	
<b>Petitioner,</b>	)	
<b>v.</b>	)	<b>Case No. HR 14-030</b>
	)	
<b>Stephanie Keys,</b>	)	
<b>Respondent.</b>	)	

Introduction

This matter was held on September 9, 2014, before Cynthia Quetsch, Hearing Officer, designated by the Commissioner of Education. Those present were:

- Nichole Bock, Counsel for the Department of Elementary and Secondary Education;
- Margery Tanner, Director of Educator Certification, Department of Elementary and Secondary Education; and
- Dana Keilholz, Legal Assistant, Department of Elementary and Secondary Education.

Findings of Fact

1. Stephanie Keys, Respondent, holds an initial professional class certificate in the areas of elementary education, grades 1 to 6, and early childhood education, birth to grade 3, issued on June 25, 2009, which expired June 25, 2013. (Petitioner’s Exhibit 2) (Transcript page 11, line 25 to page 12, line 12).
2. On or about July 18, 2011, Respondent pled guilty to two felony counts of commission of a fraudulent insurance act in violation of Mo. Rev. Stat. § 375.991 in the circuit court of Johnson County, Missouri. Respondent was given a suspended imposition of sentence of five (5) years supervised probation and two days of shock time in jail. (Petitioner’s Exhibit 6).
3. On September 9, 2014, a hearing was held before Cynthia Quetsch, Hearing Officer. Respondent was not present and was not represented by counsel. Petitioner was represented by Assistant Attorney General Nichole Bock. (Transcript page 5, line 2 to page 6, line 3).
4. Respondent received notice of the hearing by letter dated July 2, 2014, sent to the last known address of Respondent, both by certified mail and first-class mail. The certified mail was returned unclaimed, but the first-class mail was not

returned. (Petitioner's Exhibits 1 and 7) (Transcript page 7, line 16 to page 10, line 1).

5. Respondent previously had an initial professional class certificate in the areas of elementary education and early childhood education which was revoked by the State Board of Education on July 27, 2006 because she had pled guilty to a misdemeanor charge for stealing. (Petitioner's Exhibit 4) (Transcript page 13, line 25 to page 14, line 16).
6. The State Board of Education authorized Respondent to reapply for a Missouri certificate of license to teach on June 25, 2009. (Petitioner's Exhibit 5) (Transcript page 14, line 20 to page 15, line 19).

#### Conclusions of Law

1. Respondent, pled guilty to two felony counts of commission of a fraudulent insurance act in circuit court admitting guilt to violations of Mo. Rev. Stat. §375.991.
2. The charges concerning Respondent's current teaching certificate were set for hearing and notice was served on the Respondent in compliance with the requirements of Mo. Rev. Stat. § 536.067 (Supp. 2013).
3. Mo. Rev. Stat. § 168.071.1 (1) (Supp. 2013) provides the following authority to the State Board of Education:
 

*The state board of education may refuse to issue or renew a certificate, or may, upon hearing, discipline the holder of a certificate of license to teach for the following causes: (1) A certificate holder or applicant for a certificate has pleaded to or been found guilty of a felony or crime involving moral turpitude under the laws of this state, any other state, of the United States, or any other country, whether or not sentence is imposed;*
4. The Missouri Supreme Court has defined "moral turpitude" as:
 

*An act of baseness, vileness, or depravity in the private and social duties which 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'. In re Frick, 694 S.W.2d 473, 479 (Mo. banc 1985).*
5. Respondent pled guilty to two felonies.

6. Commission of a fraudulent insurance act is a crime of moral turpitude. *Brehe v. Mo. Dept. of Elem. & Sec. Ed*, 213 S.W.3d 720, 725 (Mo. App. W.D. 2007).
7. Based upon Mo. Rev. Stat. §168.071.1(1) (Supp. 2013) the State Board of Education is authorized to suspend or revoke any certificate held by Respondent.

Recommendation

It is recommended that the State Board of Education revoke the certificate of license to teach of Stephanie Keys pursuant to its authority under Mo. Rev. Stat. § 168.071 (Supp. 2013).

Submitted this 13<sup>th</sup> day of November  
2014, by the designated Hearing Officer  
for the Commissioner of Education.

A handwritten signature in black ink, appearing to read 'C. Quetsch', written over a horizontal line.

Cynthia Quetsch  
Hearing Officer



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25 (Exhibits were retained by Ms. Bock.)

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BEFORE THE STATE BOARD OF EDUCATION  
STATE OF MISSOURI

IN THE MATTER OF: )  
)  
DEPARTMENT OF ELEMENTARY )  
AND SECONDARY EDUCATION, )  
) Hearing No. 14-030  
Petitioner, )  
)  
vs. )  
)  
STEPHANIE KEYS, )  
)  
Respondent. )

DISCIPLINE HEARING  
SEPTEMBER 9, 2014  
Jefferson State Office Building  
205 Jefferson Street  
1st Floor State Board Room  
Jefferson City, Missouri

BEFORE:  
Cynthia Quetsch, Hearing Officer



1 P R O C E E D I N G S

2 HEARING OFFICER QUETSCH: This hearing  
3 is in the matter of the Department of Elementary and  
4 Secondary Education versus Stephanie Keys and has  
5 been designated Hearing 14-030.

6 This hearing is being held pursuant to  
7 Section 168.071 of the Revised Statutes of Missouri  
8 which authorizes the State Board of Education to  
9 suspend or revoke a certificate of license to teach  
10 if the certificate holder has pleaded to or been  
11 found guilty of a felony or crime involving moral  
12 turpitude under the laws of this state or any other  
13 state or of the United States or any other country  
14 whether or not sentence is imposed.

15 Administrative rules adopted by the State  
16 Board of Education pursuant to this statute  
17 authorizes the Commissioner of Education to  
18 designate a hearing officer in these matters. My  
19 name is Cynthia Quetsch and I have been designated  
20 to hear this case.

21 Unless otherwise provided under Section  
22 168.071, this hearing is being held pursuant to the  
23 procedural rules of Chapter 536, the Administrative  
24 Procedures Act.

25 The certificate holder, Stephanie Keys, is

1 not present at the hearing and is not represented by  
2 counsel. Assistant attorney general Nicole Bock is  
3 present on behalf of the State.

4 Would you like to make an opening statement?

5 MS. BOCK: Just briefly. We're here  
6 today regarding whether Ms. Keys' certificate to  
7 teach should be subjected to discipline. The  
8 evidence will show that Ms. Keys holds an Initial  
9 Professional Class Certificate of license to teach  
10 that is currently expired. That is for the areas of  
11 elementary education and early childhood education.

12 The evidence will also show that Ms. Keys  
13 previously held a certificate that was revoked by  
14 the State Board of Education and was reissued.

15 The evidence will show that she pled guilty  
16 in Johnson County, Missouri to two counts of a Class  
17 D felony of commission of a fraudulent insurance act  
18 under Section 375.991 of the Revised Statutes of  
19 Missouri.

20 And, therefore, her certificate is subject to  
21 discipline under Section 168.071 Paragraph 1 and 5  
22 CSR 20-400.231 Paragraph A.

23 HEARING OFFICER QUETSCH: Would you like  
24 to call your first witness?

25 MS. BOCK: I call Dana Keilholz as my

1 first witness.

2 (Whereupon, the witness was sworn in by  
3 the court reporter.)

4 EXAMINATION

5 QUESTIONS BY MS. BOCK:

6 **Q. Can you please state your name for the  
7 record and spell your last name?**

8 A. Dana Keilholz. K-E-I-L-H-O-L-Z.

9 **Q. And where are you currently employed?**

10 A. The Department of Education as legal  
11 assistant.

12 **Q. And what are your primary job duties as  
13 a legal assistant?**

14 A. To set up discipline hearings and notify  
15 the appropriate parties of the hearings.

16 **Q. Okay. Did you send a notice for today's  
17 hearing to Stephanie Keys who is the respondent?**

18 A. Yes, I did.

19 **Q. You have in front of you what was been  
20 previously marked as Petitioner's Exhibit 1. What  
21 is that document?**

22 A. It is a letter along with the complaint  
23 that was sent to Ms. Keys notifying her of the  
24 hearing today at ten o'clock.

25 **Q. And is this notice a record that is made**

1 by the department in the ordinary course of its  
2 business?

3 A. Yes, it is.

4 Q. Was it made by someone with knowledge of  
5 the information it contains?

6 A. Yes.

7 Q. Was it made at or near the date on that  
8 letter?

9 A. Yes.

10 MS. BOCK: I would offer Exhibit 1 into  
11 evidence.

12 HEARING OFFICER QUETSCH: It's received.

13 Q. (MS. BOCK) What information is  
14 contained in the notice in Exhibit 1?

15 A. The notice gives the certificate  
16 holder -- let's her know that a complaint has been  
17 filed against her and includes the complaint, the  
18 date and the time and the place of the hearing and  
19 instructions.

20 Q. And how was the notice sent?

21 A. I send the letter and the complaint and  
22 enclosures certified mail and first class mail.

23 Q. What address were they sent to?

24 A. 809 Vest Drive, Warrensburg, Missouri  
25 64093.

1 Q. Where did you obtain that address from?

2 A. From the complaint.

3 Q. Okay. And did you receive either of the  
4 copies of the notices that you sent to Ms. Keys, did  
5 you receive either of those back in the mail? Were  
6 they returned to you?

7 HEARING OFFICER QUETSCH: Off the  
8 record.

9 (Exhibit 7 was marked for identification  
10 by the court reporter.)

11 Q. (MS. BOCK) You have in front of you  
12 what has been marked as Exhibit 7. What is that  
13 document?

14 A. It is a copy of the envelope that was  
15 sent certified mail and was returned to me as  
16 unclaimed.

17 MS. BOCK: I would ask that Exhibit 7 be  
18 admitted.

19 HEARING OFFICER QUETSCH: It's received.

20 Q. (MS. BOCK) So the certified mail came  
21 back as unclaimed. Did you receive the first class  
22 mail back?

23 A. No.

24 Q. And in your experience would that  
25 indicate that it was delivered to Ms. Keys?

1 A. Yes.

2 MS. BOCK: I don't have any other  
3 questions.

4 HEARING OFFICER QUETSCH: Okay. You're  
5 excused. Call your next witness.

6 MS. BOCK: I call Margery Tanner.

7 (Whereupon, the witness was sworn in by  
8 the court reporter.)

9 EXAMINATION

10 QUESTIONS BY MS. BOCK:

11 **Q. Please state your name for the record**  
12 **and spell your last name.**

13 A. Margery Tanner. M-A-R-G-E-R-Y,  
14 T-A-N-N-E-R.

15 **Q. Okay. And where are you currently**  
16 **employed?**

17 A. The Department of Elementary and  
18 Secondary Education.

19 **Q. What is your position there?**

20 A. I am the director for educator  
21 certification.

22 **Q. And what are your primary job duties as**  
23 **director for educator certification?**

24 A. I license educators for the State of  
25 Missouri.

1 Q. And do you also maintain teacher  
2 certification records?

3 A. Yes.

4 Q. You have in front of you what has been  
5 marked as Exhibit 2. What is that document?

6 A. This is a certification record for  
7 Stephanie Dawn Keys.

8 Q. And I'll go ahead and have you --  
9 Exhibit 3 is there also. Can you identify that?

10 A. Yes, this is the Core Data record which  
11 would reflect where she taught in Missouri.

12 Q. Are both Exhibit 2 and Exhibit 3 records  
13 that are maintained by the department in the  
14 ordinary course of its business?

15 A. Yes.

16 Q. Would those records be made by someone  
17 with knowledge of the information they contain?

18 A. Yes.

19 Q. Would they be made at or near the time  
20 of the information that they record?

21 A. Yes.

22 MS. BOCK: I would ask that Exhibits 2  
23 and 3 be admitted.

24 HEARING OFFICER QUETSCH: Received.

25 Q. (MS. BOCK) Referring to Exhibit 2,

1 **what certificates does Ms. Keys hold?**

2 A. She holds an Initial Professional  
3 Certificate for the areas of elementary education,  
4 grades one through six, and early childhood  
5 education, birth through grade three.

6 **Q. And when were those certificates issued?**

7 A. June 25th, 2009.

8 **Q. And what is the status of her**  
9 **certificate or certificates?**

10 A. They have expired.

11 **Q. Okay. And when did they expire?**

12 A. June 25th, 2013.

13 **Q. And does Exhibit 3 reflect whether**  
14 **Ms. Keys is currently teaching or serving as an**  
15 **administrator in Missouri?**

16 A. It shows that the last time she was  
17 reported as working in a public school was in the  
18 09-10 school year.

19 **Q. And what school district was that for?**

20 A. Harrisonville R9.

21 **Q. Okay. You testified that her current**  
22 **certificate was issued in 2009, correct?**

23 A. Correct.

24 **Q. However, if you look at Exhibit 3 it**  
25 **shows that she taught in 2004-2005, am I right?**

1 A. Yes.

2 **Q. Okay. And how is that?**

3 A. She most likely had a certificate prior  
4 to that date. I just don't have that information in  
5 front of me.

6 **Q. Okay. I've already given you what has  
7 been marked as Exhibit 4 and could you identify what  
8 that document is?**

9 A. Yes, this is a letter that was sent to  
10 Ms. Keys regarding a decision made by the State  
11 Board of Education concerning her certification.

12 **Q. And are these records maintained by the  
13 department in the regular course of its business?**

14 A. Yes.

15 **Q. And is that -- would that record be made  
16 at or near the time of the event it records?**

17 A. Yes.

18 **Q. And would it be made by someone with  
19 knowledge of the information it contains?**

20 A. Yes.

21 MS. BOCK: I ask that Exhibit 4 be  
22 admitted.

23 HEARING OFFICER QUETSCH: It is  
24 received.

25 **Q. (MS. BOCK) Could you explain what type**

1 of action Exhibit 4 shows that the board was taking  
2 with regards to Ms. Keys' certification?

3 A. The State Board met and voted to revoke  
4 her Initial Professional Certificate.

5 Q. And behind the letter showing that it  
6 was revoked, what else is contained in Exhibit 4?

7 A. The information that was being presented  
8 to the board for their consideration.

9 Q. And does that indicate why her previous  
10 certificate was revoked?

11 A. Yes, it does.

12 Q. And what was that reason?

13 A. It states that on or about January 5th,  
14 2004, she pled guilty to the crime of stealing  
15 property valued at \$500 or less, which was a Class A  
16 misdemeanor.

17 Q. At this time I direct your attention to  
18 Exhibit 5.

19 A. Okay.

20 Q. What is Exhibit 5?

21 A. This is also a letter indicating a  
22 decision made by the State Board with regards to her  
23 certification.

24 Q. This also would be maintained by the  
25 department in the ordinary course of its business?

1 A. Yes.

2 Q. And it would be made at or near the time  
3 of the event by someone with knowledge of the  
4 information it contains?

5 A. Yes.

6 MS. BOCK: I'd ask that Exhibit 5 be  
7 admitted.

8 HEARING OFFICER QUETSCH: It is  
9 received.

10 Q. (MS. BOCK) And what does Exhibit 5  
11 indicate what action was the board taking with  
12 regard to her certification at that time?

13 A. She had petitioned the board to have her  
14 Initial Professional Certificate reinstated and the  
15 board authorized the reinstatement of her  
16 certification.

17 Q. So then that reinstatement gave her the  
18 certificate that she has currently, correct?

19 A. That's correct.

20 MS. BOCK: Okay. I don't have any other  
21 questions for Ms. Tanner at this time.

22 HEARING OFFICER QUETSCH: Okay. You're  
23 excused.

24 MS. BOCK: At this time I would like to  
25 also offer into evidence Exhibit 6, which is

1 certified records from Johnson County showing that  
2 Ms. Keys pled guilty on July 18th of 2011 to two  
3 counts of commission of a fraudulent insurance act,  
4 which is a Class D felony under Section 375.991 of  
5 the Revised Statutes of Missouri.

6 HEARING OFFICER QUETSCH: It is  
7 received.

8 MS. BOCK: I don't have any other  
9 evidence at this time.

10 HEARING OFFICER QUETSCH: Did you want  
11 to make a closing statement?

12 MS. BOCK: Just briefly. Ms. Keys  
13 should be subjected to discipline under Section  
14 168.071.1 Paragraph 1 and 5 CSR 20-400.230 1A  
15 because she pled guilty to a felony, two felonies  
16 and those are also offenses of moral turpitude.

17 The board should also consider in this  
18 instance that she previously had a certificate that  
19 was revoked for other reasons when determining the  
20 amount of discipline to impose.

21 I would ask that the board take that into  
22 consideration and impose whatever discipline is  
23 appropriate. Thank you.

24 HEARING OFFICER QUETSCH: Thank you.  
25 Let's close the record.

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(Hearing concluded at 10:42 a.m.)

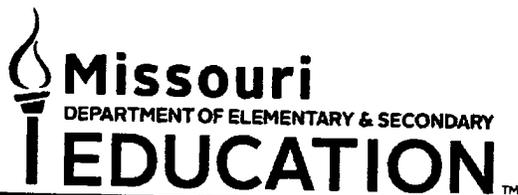
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CERTIFICATE OF REPORTER

I, Suzanne Zes, within and for the State of Missouri, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

\_\_\_\_\_

Court Reporter



Mark Allan Van Zandt • General Counsel

205 Jefferson Street, P.O. Box 480 • Jefferson City, MO 65102-0480 • dese.mo.gov

July 2, 2014

Ms. Stephanie D. Keys  
809 Vest Dr.  
Warrensburg, MO 64093

**RETURN RECEIPT REQUESTED**  
**CERTIFIED MAIL # 7006 0100 0005 2165 0755**  
**And VIA FIRST-CLASS MAIL**

RE: *Department of Elementary and Secondary Education v. Stephanie D. Keys*  
Case No. HR 14-030

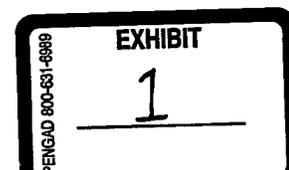
Dear Ms. Keys:

Pursuant to §168.071, RSMo Supp. 2013, the Missouri State Board of Education is initiating disciplinary proceedings against your certificate of license to teach. A copy of the complaint is enclosed.

In accordance with the procedures found in §168.071, RSMo Supp. 2013, and 5 CSR 20-400.230, you are notified that a hearing will be held September 9, 2014, by a hearing officer designated by the Commissioner of Education. Enclosed is a copy of the cited statute and regulation for your reference.

The hearing will commence at 10:00 a.m. Please report to the State Board of Education Room on the first floor of the Jefferson State Office Building, located at 205 Jefferson Street, Jefferson City, Missouri. You are strongly encouraged to be present at the hearing, either personally and/or through legal counsel, together with witnesses of your choice to give information relative to these allegations and to show cause as to why disciplinary action should not be taken against your certificate of license to teach.

If you wish to offer documents into evidence at the hearing, please bring three copies of each document. The information gathered at the hearing and the findings of the hearing officer will be provided to the State Board of Education for a decision in this case.



Ms. Stephanie D. Keys  
Page 2  
July 2, 2014

**If you will be represented by legal counsel please have them enter their appearance in this matter with this office as soon as possible.** Should you have any questions in this matter, please feel free to contact my office at (573) 751-3527.

Sincerely,



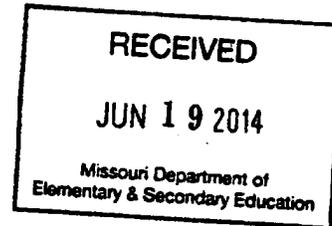
Mark Allan Van Zandt

Enclosures

c: Nichole Bock, Assistant Attorney General  
Paul Katnik, Assistant Commissioner, Educator Quality  
Margery Tanner, Director, Educator Certification

**BEFORE THE  
MISSOURI STATE BOARD OF EDUCATION**

**MISSOURI DEPARTMENT  
OF ELEMENTARY  
AND SECONDARY EDUCATION**  
P.O. Box 480  
Jefferson City, MO 65102



**Petitioner,**

v.

*HR*  
Case No. *14-030*

**STEPHANIE D. KEYS**  
809 Vest Dr.  
Warrensburg, MO 64093

**Respondent.**

**COMPLAINT**

Petitioner, the Missouri Department of Elementary and Secondary Education ("the Department"), by and through counsel the Attorney General of the State of Missouri, states the following for its cause of action against the Respondent, Stephanie D. Keys ("Keys"):

1. The Department is an agency of the State of Missouri, created and established pursuant to § 161.020, RSMo,<sup>1</sup> for the purpose of administering and enforcing the provisions of Chapters 161 and 168, RSMo, governing public school personnel, including teachers and others.

2. Keys previously held an Initial Professional Class certificate of

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<sup>1</sup>All statutory citations are to the 2000 Missouri Revised Statutes as amended unless otherwise indicated.

*[Handwritten mark]*

license to teach in the areas of elementary education, grades 1-6, and early childhood education, grades B-3 (“original certificate”).

3. On or about July 27, 2006, the Missouri State Board of Education (“State Board”) voted to revoke Keys’ original certificate because she pled guilty to the class A misdemeanor of stealing.

4. On or about June 25, 2009, the State Board authorized Keys’ reapplication for a Missouri certificate of license to teach.<sup>2</sup>

5. Following approval of her reapplication, Keys held a valid Initial Professional Class certificate in the areas of elementary education, grades 1-6, and early childhood education, grades B-3, from June 25, 2009 to June 25, 2013 (“second certificate”).

6. Keys’ second certificate expired on June 25, 2013, due to failure to renew. However, Keys’ second certificate was current and valid at the times the acts alleged herein occurred.

7. Jurisdiction and venue are proper before the State Board pursuant to § 168.071, RSMo (Cum. Supp. 2013), and 5 CSR 20-400.230.

8. Section 168.071, RSMo (Cum. Supp. 2013), which authorizes the State Board to discipline a certificate holder, states in pertinent part:

1. The state board of education may . . . upon hearing, discipline the holder of a certificate of license to teach for the following causes:

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<sup>2</sup> Keys was then known as Stephanie Withrich.

(1) A certificate holder or applicant for a certificate has pleaded to or been found guilty of a felony or crime involving moral turpitude under the laws of this state, any other state, of the United States, or any other country, whether or not sentence is imposed;

...

(3) There is evidence of incompetence, immorality, or neglect of duty by the certificate holder[.]

9. 5 CSR 20-400.230 states in pertinent part:

(1) The State Board of Education (the board) may discipline . . . a certificate of license to teach for any one (1) or combination of the following:

(A) An individual has pled guilty or been found guilty of a felony or crime involving moral turpitude whether or not sentence is imposed;

...

(C) Evidence of the certificate holder's incompetence, immorality, or neglect of duty;

...

(8) The board may suspend or revoke for a specified time, or indefinitely, a certificate of license to teach pursuant to the rules promulgated by the board. The board may also accept a voluntary surrender or informally settle a case through a consent agreement or agreed settlement.

10. On or about July 18, 2011, Keys pled guilty in the Circuit Court of Johnson County, Missouri, case number 10JO-CR00696-01, to two counts

of the class D felony of commission of a fraudulent insurance act, in violation of § 375.991, RSMo.

11. Section 375.991, RSMo (Cum. Supp. 2013) states in pertinent part:

1. As used in sections 375.991 to 375.994, the term "statement" means any communication, notice statement, proof of loss, bill of lading, receipt for payment, invoice, account, estimate of damages, bills for services, diagnosis, prescription, hospital or doctor records, x-rays, test results or other evidence of loss, injury or expense.

2. For the purposes of sections 375.991 to 375.994, a person commits a "fraudulent insurance act" if such person knowingly presents, causes to be presented, or prepares with knowledge or belief that it will be presented, to or by an insurer, purported insurer, broker, or any agent thereof, any oral or written statement including computer generated documents as part of, or in support of, an application for the issuance of, or the rating of, an insurance policy for commercial or personal insurance, or a claim for payment or other benefit pursuant to an insurance policy for commercial or personal insurance, which such person knows to contain materially false information concerning any fact material thereto or if such person conceals, for the purpose of misleading another, information concerning any fact material thereto.

3. A "fraudulent insurance act" shall also include but not be limited to knowingly filing false insurance claims with an insurer, health services corporation, or health maintenance organization by engaging in any one or more of the following false billing practices:

- (1) "Unbundling", an insurance claim by claiming a number of medical procedures were performed instead of a single comprehensive procedure;
- (2) "Upcoding", an insurance claim by claiming that a more serious or extensive procedure was performed than was actually performed;
- (3) "Exploding", an insurance claim by claiming a series of tests was performed on a single sample of blood, urine, or other bodily fluid, when actually the series of tests was part of one battery of tests; or
- (4) "Duplicating", a medical, hospital or rehabilitative insurance claim made by a health care provider by resubmitting the claim through another health care provider in which the original health care provider has an ownership interest.

Nothing in sections 375.991 to 375.994 shall prohibit providers from making good faith efforts to ensure that claims for reimbursement are coded to reflect the proper diagnosis and treatment.

...

6. A fraudulent insurance act for a first offense is a class D felony. Any person who pleads guilty to or is found guilty of a fraudulent insurance act who has previously pled guilty to or has been found guilty of a fraudulent insurance act shall be guilty of a class C felony.

12. As a result of Keys' guilty plea in case number 10JO-CR00696-01, the court suspended imposition of sentence and placed Keys on supervised probation for five years. The court also ordered Keys to serve two days of "shock time" in the Johnson County Jail.

13. Cause exists to discipline Keys' certificate pursuant to § 168.071.1(1), RSMo (Cum. Supp. 2013) and 5 CSR 20-400.230(1)(A) because she pled guilty to two counts of commission of a fraudulent insurance act, which is both a felony and an offense involving moral turpitude.

14. Cause also exists to discipline Keys' certificate pursuant to § 168.071.1(3), RSMo (Cum. Supp. 2013) and 5 CSR 20-400.230(1)(C) because Keys' conduct underlying the offense of commission of a fraudulent insurance act is evidence of her incompetence, immorality, and/or neglect of duty.

Based upon the foregoing, Petitioner prays the Missouri State Board of Education to conduct a hearing pursuant to Chapter 168, RSMo, and thereafter issue its findings of fact and conclusions of law determining that Keys' certificate to teach should be disciplined and for such other and further relief as is deemed just and proper.

Respectfully submitted,

CHRIS KOSTER  
Attorney General



NICHOLE M. BOCK  
Assistant Attorney General  
Missouri Bar No. 64222

P.O. Box 899  
Jefferson City, MO 65102

**Telephone: 573-751-4087**  
**Facsimile: 573-751-5660**  
**Email: nichole.bock@ago.mo.gov**

**Attorneys for Petitioner**



DESE - Certificate Status

▶ Selection Criteria

Educator ID: 211195 Social Security Number: [REDACTED]  
 Name: STEPHANIE DAWN KEYS  
 Address: 956 E MARKET STREET  
 City: WARRENSBURG State: MO Zip: 64093-0000  
 Personal Phone: ( 816 ) 419 - 7610  
 Work Phone: ( \_\_\_ ) \_\_\_ - \_\_\_  
 Email Address:

[Edit Contact Information](#)

2 record(s)

Certification						
Subject Area/Grade Level	Classification	Effective Date	Expiration Date	Analysis Indicator	Status	Evaluation
ELEMENTARY ED 1-6	INITIAL PC	06/25/2009	06/25/2013	COLLEGE RECOMMENDED	EXPIRED	
EARLY CHILD ED B-3	INITIAL PC	06/25/2009	06/25/2013	COLLEGE RECOMMENDED	EXPIRED	

▼ Evaluations

0 record(s)

Evaluation			
Subject Area/Grade Level	Evaluation Date	Status	Evaluation

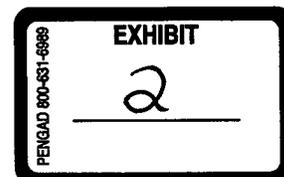
Email: [certification@dese.mo.gov](mailto:certification@dese.mo.gov)

Current User: ALEE Last Modified User: Expired Batch Process Last Modified Date: 6/26/2013 11:00:02 PM

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Ver. 2.7.0514



Year: 2004

017-125 CARROLLTON R-VII Class/Org: A - K444 Supv: KING Dist Yrs Exp: 1 Degree: BACC

Schl	Pos	FTE	CTE	Asgn	Course	No/Name	Seq	Gr	Pr	DS	S	Min	Crdt	Enr	AC	AC MSG	HQ	HQ MSG	Lt	Sirt	Erly	Erly End	
4040	60	1		1		ELEM	0	K		0	1695	0	15	Y									
				2	990000	PLAN TIME	0			0	225	0	0										
				20		ELEM	0	01		0	0	0	18	Y									

CA Comment: REPLACED CONNIE MELLENCAMP

ED Comment: REPLACED CONNIE MELLENCAMP

Year: 2005

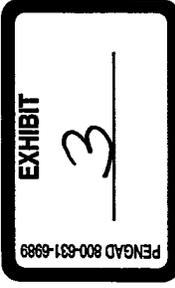
017-125 CARROLLTON R-VII Class/Org: A - K444 Supv: KING Dist Yrs Exp: 2 Degree: BACC

Schl	Pos	FTE	CTE	Asgn	Course	No/Name	Seq	Gr	Pr	DS	S	Min	Crdt	Enr	AC	AC MSG	HQ	HQ MSG	Lt	Sirt	Erly	Erly End	
4040	60	1		1		ELEM	0	K		0	1695	0	17	Y									
				2	990000	PLAN TIME	0			0	225	0	0										

Year: 2010

019-149 HARRISONVILLE R-IX Class/Org: A - K624 Supv: STANSBERRY Dist Yrs Exp: 1 Degree: BACC

Schl	Pos	FTE	CTE	Asgn	Course	No/Name	Seq	Gr	Pr	DS	S	Min	Crdt	Enr	AC	AC MSG	HQ	HQ MSG	Lt	Sirt	Erly	Erly End	
4060	60	1		1	054891	SUP COM ARTS	0	K	03	C	0	1680	0	38	Y		P						
				2	990000	PLAN TIME	0			0	300	0	0	0									



D. Kent King  
Commissioner of Education



P.O. Box 480  
Jefferson City, MO 65102-0480  
<http://dese.mo.gov>

## Missouri Department of Elementary and Secondary Education

— Making a positive difference through education and service —

August 8, 2006

Ms. Stephanie Keys  
400 SW 400th Road #B  
Centerview, MO 64019

**RETURN RECEIPT REQUESTED**  
**CERTIFIED MAIL # 7003 1010 0002 6719 6287**

RE: *Department of Elementary and Secondary Education*  
*v. Stephanie Keys, Case Number HR 06-004*

Dear Ms. Keys:

The State Board of Education met July 27, 2006, to consider the charges filed by the Department of Elementary and Secondary Education requesting discipline of your certification. Under consideration by the State Board of Education were the Findings of Fact and Conclusions of Law issued by the designated hearing officer, along with the transcript, exhibits, pleadings, and other materials from the May 2, 2006, hearing, which you previously received. Based upon review of these materials, the State Board voted to revoke your certification.

By copy of this letter, the parties to this action are given notice of the State Board of Education's final action in this matter. Should you have any questions regarding this decision, you may contact School Laws at (573) 751-3527.

Sincerely,

A handwritten signature in black ink that reads "D. Kent King".

D. Kent King

C: Nicole Loethen, Counsel for Petitioner  
Charles Brown, Assistant Commissioner, Teacher Quality & Urban Education  
Rusty Rosenkoetter, Coordinator, Educator Certification  
Mark Allan Van Zandt, Hearing Officer





**Missouri Department of Elementary and Secondary Education**

— Making a positive difference through education and service —

July 21, 2006

Ms. Stephanie Keys  
400 SW 400th Road #B  
Centerview, MO 64019

**RETURN RECEIPT REQUESTED**  
**CERTIFIED MAIL #7003 1010 0002 6719 6270**

RE: *Department of Elementary and Secondary Education*  
*v. Stephanie Keys, Case Number HR 06-004*

Dear Ms. Keys:

Please find the enclosed agenda item for the Missouri State Board of Education. This item is scheduled to go before the Board during its July 27-28, 2006, meeting in the State Board Room located on the sixth (6<sup>th</sup>) floor of the Jefferson State Office Building, 205 Jefferson Street, Jefferson City, Missouri. The Commissioner of Education, D. Kent King, will inform you of the outcome of the State Board of Education's consideration of this matter.

Sincerely,

A handwritten signature in black ink that reads "Mark Allan Van Zandt".

Mark Allan Van Zandt  
General Counsel

Enclosure

c: Nicole Loethen, Counsel for Petitioner  
Charles Brown, Assistant Commissioner, Teacher Quality & Urban Education  
Rusty Rosenkoetter, Director, Educator Certification ✓

**AGENDA ITEM:**

**CONSIDERATION TO DISCIPLINE THE  
LICENSE TO TEACH OF STEPHANIE KEYS, CASE # HR 06-004**

**STATUTORY AUTHORITY:**

Section 168.071, RSMo

Consent  
ItemAction  
ItemReport  
Item

07/06

**SUMMARY:**

Stephanie Keys, Respondent, holds an Initial Professional Class certificate in the areas of Elementary Education, grades 1-6, and Early Childhood Education, grades B-3. Respondent's certificate is current and active and was so during all times material herein.

On or about January 5, 2004, Respondent pled guilty to the crime of stealing property valued at \$500.00 or less, a class A misdemeanor, in the Circuit Court of Cass County, Missouri, in Case No. CR303-567FX.

By letter dated March 10, 2006, Respondent received notice of this complaint and of a hearing scheduled for May 2, 2006.

On May 2, 2006, a hearing was held before Mark Allan Van Zandt, designated Hearing Officer. The Respondent was not present either personally or through counsel.

**PRESENTER(S):**

Mark Allan Van Zandt, General Counsel, will participate in the presentation and discussion of this agenda item.

**RECOMMENDATION:**

It is the recommendation of the Commissioner that the State Board of Education revoke Stephanie Keys's certificate of license to teach pursuant to its authority under Mo. Rev. Stat. § 168.071 (Supp. 2005).

BEFORE THE STATE BOARD OF EDUCATION  
STATE OF MISSOURI

IN THE MATTER OF:	)	
	)	
Department of Elementary and Secondary	)	
Education,	)	
Petitioner,	)	
	)	
v.	)	Case No. HR 06-004
	)	
Stephanie Keys,	)	
Respondent.	)	

Introduction

This matter was held on May 2, 2006, before Mark Allan Van Zandt, Hearing Officer designated by the Commissioner of Education. Those present were:

Nicole Loethen, Assistant Attorney General, Counsel for Department of Elementary and Secondary Education;  
Margery Tanner, Supervisor, Educator Certification, Department of Elementary and Secondary Education, witness for Petitioner; and  
Dana Keilholz, Administrative Assistant, Department of Elementary and Secondary Education, witness for Petitioner.

Findings of Fact

1. Stephanie Keys, Respondent, holds an Initial Professional Class certificate in the areas of Elementary Education, grades 1-6, and Early Childhood Education, grades B-3. Respondent's certificate is current and active and was so during all times material herein. (Petitioner's Exhibit 1) (Transcript page 6, line 4 - page 9, line 7).
2. On or about January 5, 2004, Respondent pled guilty to the crime of stealing property valued at \$500.00 or less, a class A misdemeanor, in the Circuit Court of Cass County, Missouri, in Case No. CR303-567FX. (Petitioner's Exhibit 4) (Transcript page 13, lines 7 - 17).
3. By letter dated March 10, 2006, Respondent received notice of this complaint and of a hearing scheduled for May 2, 2006. (Petitioner's Exhibit 2) (Transcript page 9, line 18 - page 11, line 16).
4. A return receipt dated March 13, 2006, documented receipt of that notice. (Petitioner's Exhibit 3) (Transcript page 11, line 17 - page 13, line 2).
5. On May 2, 2006, a hearing was held before Mark Allan Van Zandt, designated Hearing Officer. The Respondent was not present either personally or through counsel. (Transcript page 4, lines 16 - 21) (Transcript page 13, line 24 - page 14, line 6).

Conclusions of Law

1. The conviction of Stephanie Keys, Respondent for stealing property valued at \$500.00 or less is a class A misdemeanor pursuant to Mo. Rev. Stat. § 570.030 Cum. Supp. 2003.
2. These charges were set for hearing and notice was served on the Respondent in compliance with the requirements of Mo. Rev. Stat. § 536.067 (2000).
3. The Missouri Supreme Court has defined "moral turpitude" as:

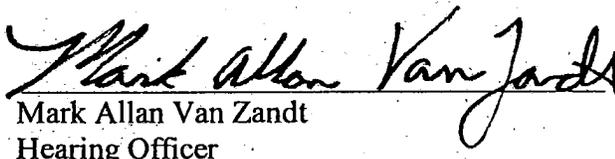
*An act of baseness, vileness, or depravity in the private and social duties which man owes to his fellowman or to society in general, contrary to the accepted and customary rule of right and duty between man and man; everything 'done contrary to justice, honesty, modesty and good morals'.  
In re Frick, 694 S.W.2d 473, 479 (Mo. banc 1985).*

4. Mo. Rev. Stat. § 168.071.1 (1) (Supp. 2005) provides the following authority to the State Board of Education:

*The state board of education may refuse to issue or renew a certificate, or may, upon hearing, discipline the holder of a certificate of license to teach for the following causes: (1) A certificate holder or applicant for a certificate has pleaded to or been found guilty of a felony or crime involving moral turpitude under the laws of this state, any other state, of the United States, or any other country, whether or not sentence is imposed;*

5. Based upon the notice of hearing and the documentation of the criminal conviction, the State Board of Education, pursuant to Mo. Rev. Stat. § 168.071 (Supp. 2005), is authorized to suspend or revoke the certification of Stephanie Keys.

Submitted this 11<sup>th</sup> day of July 2006, by the  
designated Hearing Officer for the Commissioner of  
Education.

  
Mark Allan Van Zandt  
Hearing Officer

**Bert Schulte**  
Interim Commissioner of Education



205 Jefferson Street  
P.O. Box 480  
Jefferson City, MO 65102-0480  
<http://dese.mo.gov>

**Missouri Department of Elementary and Secondary Education**

— Making a positive difference through education and service —

**COPY**

June 26, 2009

STEPHANIE WITHRICH  
956 EAST MARKET STREET  
WARRENSBURG MO 64093

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
Article No.: 7003 1010 0002 6721 1331  
SSN: [REDACTED]

Dear Ms. Withrich:

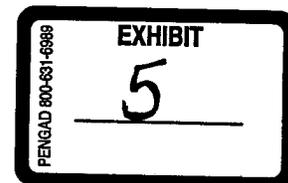
This letter is confirmation that the State Board of Education met on June 25, 2009, and reviewed materials related to your reapplication for a Missouri certificate of license to teach. The State Board voted to authorize your reapplication for a Missouri certificate of license to teach.

A copy of this letter will be forwarded to Educator Certification/Certification, so that they may process your application. Should you have any questions about the processing of your application, please direct your inquiries to Certification at (573) 751-0051.

Sincerely,

Amy Lee, Administrative Assistant  
Educator Certification/Conduct and Investigations

c: Charles Brown, Assistant Commissioner, Teacher Quality and Urban Education  
Educator Certification/Certification



**AGENDA ITEM:**

**CONSIDERATION OF A REQUEST BY STEPHANIE D. (KEYS) WITHRICH  
FOR ISSUANCE OF A TEACHING CERTIFICATE**

**STATUTORY AUTHORITY:**

Section 168.021, RSMo and 5 CSR 80-800.060

Consent  
ItemAction  
ItemReport  
Item

06/09

**COMMISSIONER'S GOAL NO. 1:**

Continue to focus on improved student performance for all students in a safe environment for learning.

**SUMMARY:**

Applicant's Name: Stephanie D. (Keys) Withrich

Stephanie Withrich is reapplying for a Missouri certificate of license to teach in the area of early childhood, grades B-3. On July 27, 2006, the State Board of Education voted to revoke Stephanie Withrich's certificate of license to teach.

Pursuant to 5 CSR 80-800.060, Stephanie Withrich has provided the Department the following information: Application form; Affidavit of Moral Character; Court Documents; Explanations; and Reference Letters.

Offense: On January 5, 2004, Stephanie Withrich pled guilty and received a suspended imposition of sentence to the misdemeanor, Theft/Stealing, in the Circuit Court of Cass County, case number CR303-567-FX.

Personal History: Ms. Withrich and her boyfriend lived together for four years. When she discovered she was pregnant, he told her she could take her things if he didn't have to pay child support. She took her things but did file for child support and he filed theft charges. The situation between her and her boyfriend was litigated and her license was revoked in July 2006. She has made restitution and has completed two years of probation. Since then, she has operated a daycare in her home and worked in a private preschool.

Letters of Recommendation: Three (3) – (Attorney, Pastor, Friend).

Interview or pertinent information: On May 5, 2009, Stephanie Withrich attended an interview with Department staff. Ms. Withrich regrets her past mistakes and has learned a lot. She has developed the ability to forgive and to move forward. She would like to return to teaching and working with kindergarten students.

Pursuant to 5 CSR 80-800.060, an individual who has been disciplined by the State Board of Education may only be recertified by the State Board of Education.

**PRESENTER(S):**

Rusty Rosenkoetter, Coordinator, Educator Certification, Division of Teacher Quality and Urban Education, will assist in the presentation and discussion of this agenda item.

Report: CZR0026

17TH JUDICIAL CIRCUIT  
JOHNSON  
CIRCUIT COURT DOCKET SHEET

Date: 19-Jul-2011

Time: 2:05:05PM

Page: 1

**10JO-CR00696-01 ST V STEPHANIE DAWN KEYS****Security Level: 1 Public**

**Case Type:** CC Felony **Case Filing Date:** 28-Dec-2010  
**Status:** Judgment CVC \$46 - Other  
**Disposition:** Guilty Plea **Disposition Date:** 18-Jul-2011  
**OCN#:** V2001570  
**Arresting Agency:** MO0510300

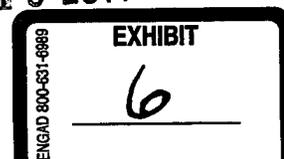
Release/Status Reason  
Change Date

Judge R. MICHAEL WAGNER (38176)  
Defendant **STEPHANIE DAWN KEYS (KEYSD7239)**  
Attorney for Defendant LANCE A. RIDDLE(36775)  
Assistant Prosecuting Attorney JULIE ANNETTE HIGHLEY (44994)

Charge #	Charge Date	Charge Code	Charge Description
<b>Original Charge:</b>	1	20-Jul-2009	1977500 Commission Of Fraudulent Insurance Act ( <b>Felony D RSMo : 375.991</b> )
<b>Disposition:</b>	18-Jul-2011	Guilty Plea	
<b>Order Date:</b>	18-Jul-2011		<b>Sentence or SIS:</b> Suspended Imposition of Sent.
<b>Length:</b>	5 Years		<b>Start Date:</b> 18-Jul-2011
<b>Text:</b>	DEFENDANT PLACED ON FIVE YEARS SIS SUPERVISED PROBATION. DEFENDANT TO SERVE 2 DAYS SHOCK TIME IN THE JOHNSON COUNTY JAIL BEGINNING 8/12/11 AT 7 PM.		
<b>Original Charge:</b>	2	15-Jun-2009	1977500 Commission Of Fraudulent Insurance Act ( <b>Felony D RSMo : 375.991</b> )
<b>Disposition:</b>	18-Jul-2011	Guilty Plea	
<b>Order Date:</b>	18-Jul-2011		<b>Sentence or SIS:</b> Suspended Imposition of Sent.
<b>Length:</b>	5 Years		<b>Start Date:</b> 18-Jul-2011
<b>Text:</b>	DEFENDANT PLACED ON FIVE YEARS SIS SUPERVISED PROBATION. DEFENDANT TO SERVE 2 DAYS SHOCK TIME IN THE JOHNSON COUNTY JAIL BEGINNING 8/12/11 AT 7 PM.		
<b>Program:</b>	PROBATION		<b>Agency:</b> Missouri Board of Probation & Parole
<b>Associated To:</b>	Charge 1, Charge 2		
<b>Classification:</b>	SUPERVISED		
<b>Start Date:</b>	18-Jul-2011	<b>Due to End</b>	18-Jul-2016

<u>Filing Date</u>	<u>Description</u>
19-Jul-2011	<b>Judge/Clerk - Note</b> COPY OF SHOCK TIME PUT IN SHERIFF BOX, mb
18-Jul-2011	<b>Order for Supervised Probation</b> <b>Judgment CVC \$46 - Other</b> <b>Judgment Against:</b> STEPHANIE KEYS; <b>Amount:</b> \$46.00; <b>Satisfied Date:</b> <b>Associated To:</b> STEPHANIE D KEYS <b>Felony SIS Costs</b>

REC'D FEB 13 2014



Report: CZR0026

17TH JUDICIAL CIRCUIT  
JOHNSON  
CIRCUIT COURT DOCKET SHEET

Date: 19-Jul-2011  
Time: 2:05:05PM  
Page: 2

Case continued from previous page.

**10JO-CR00696-01 ST V STEPHANIE DAWN KEYS****Security Level: 1 Public**

- 18-Jul-2011 **Guilty Plea**  
**Exhibit Filed**  
DEFENDANT'S EXHIBIT 1 (PETITION TO ENTER PLEA OF GUILTY), filed  
**Plea Hearing Held**  
State appears by Assistant Prosecutor, Nathan Chapman. Defendant appears in person and by retained counsel, John Clark. Defendant enters a plea of guilty and waives SAR. Defendant is sentenced per record and sentence to be filed. /s/ RMW mb
- 06-Jun-2011 **Plea/Trial Setting Scheduled**  
**Scheduled For:** 18-Jul-2011; 10:00 AM; R. MICHAEL WAGNER; **Setting:** 0; Johnson  
**Hearing Continued/Rescheduled**  
State appears by Assistant Prosecutor, Nathan Chapman. Defendant appears not but by retained counsel, Lance Riddle. Case set 7/18/11 at 10:00 a.m. for plea./s/RMW  
**Hearing Continued From:** 06-Jun-2011; 10:00 AM
- 16-May-2011 **Plea/Trial Setting Scheduled**  
**Scheduled For:** 06-Jun-2011; 10:00 AM; R. MICHAEL WAGNER; **Setting:** 0; Johnson  
**Hearing Continued/Rescheduled**  
State appears by Assistant Prosecuting Attorney Julie Highley. Defendant appears by retained counsel, Lance Riddle. Case set for plea on June 6, 2011 at 10:00 a.m./s/RMW  
**Hearing Continued From:** 16-May-2011; 10:00 AM
- 04-Apr-2011 **Plea/Trial Setting Scheduled**  
**Scheduled For:** 16-May-2011; 10:00 AM; R. MICHAEL WAGNER; **Setting:** 0; Johnson  
**Hearing Continued/Rescheduled**  
State appears by Assistant Prosecutor, Julie Highley. Defendant appears in person and by retained counsel, Lance Riddle. Case set for plea on 05/16/2011 at 10:00 am. /s/ RMW tn  
**Hearing Continued From:** 04-Apr-2011; 10:00 AM
- 07-Mar-2011 **Plea/Trial Setting Scheduled**  
**Scheduled For:** 04-Apr-2011; 10:00 AM; R. MICHAEL WAGNER; **Setting:** 0; Johnson  
**Hearing Continued/Rescheduled**  
State appears by Assistant Prosecutor, Julie Highley. Defendant appears in person and by retained counsel, Lance Riddle. Case set for review on 04/04/2011 at 10:00 am. /s/ RMW tn  
**Hearing Continued From:** 07-Mar-2011; 10:00 AM
- 08-Feb-2011 **Plea/Trial Setting Scheduled**  
**Scheduled For:** 07-Mar-2011; 10:00 AM; R. MICHAEL WAGNER; **Setting:** 0; Johnson
- 07-Feb-2011 **Hearing Continued/Rescheduled**  
State appears by Assistant Prosecutor, Julie Highley. Defendant appears in person and by retained counsel, Lance Riddle. Case set for plea or trial setting on 03/07/2011 at 10:00 am. /s/ RMW tn  
**Hearing Continued From:** 07-Feb-2011; 10:00 AM
- 03-Jan-2011 **Case Review Scheduled**  
**Scheduled For:** 07-Feb-2011; 10:00 AM; R. MICHAEL WAGNER; **Setting:** 2; Johnson  
**Initial Arraignment Hrng Held**  
State appears by Assistant Prosecutor, Julie Highley. Defendant appears in person and by retained counsel, Lance Riddle. Case set for review on 02/07/2011 at 10:00 am. /s/ RMW tn

**REC'D FEB 18 2014**

Report: CZR0026

17TH JUDICIAL CIRCUIT  
JOHNSON  
CIRCUIT COURT DOCKET SHEETDate: 19-Jul-2011  
Time: 2:05:05PM  
Page: 3

Case continued from previous page.

**10JO-CR00696-01 ST V STEPHANIE DAWN KEYS****Security Level: 1 Public**

30-Dec-2010 **Filing:**  
DISCLOSURE BY STATE OF MISSOURI, filed  
**Filed By:** JULIE A HIGHLEY

**Motion for Disclosure**  
REQUEST FOR DISCLOSURE BY DEFENDANT TO STATE WITHOUT COURT ORDER, filed  
**Filed By:** JULIE A HIGHLEY

**Information Filed**  
FELONY INFORMATION, filed  
**Filed By:** JULIE A HIGHLEY

28-Dec-2010 **Initial Arraignment Scheduled**  
**Scheduled For:** 03-Jan-2011; 1:30 PM; R. MICHAEL WAGNER; **Setting:** 0; Johnson  
**Judge Assigned**

REC'D FEB 18 2014

I HEREBY ATTEST AND CERTIFY ON 2-11-14  
THAT THE FOREGOING DOCUMENT IS A FULL, TRUE, AND  
COMPLETE COPY OF THE ORIGINAL ON FILE IN MY OFFICE  
AND IN MY LEGAL CUSTODY.

STEPHANIE ELKINS  
CLERK OF THE CIRCUIT COURT  
JOHNSON COUNTY, MISSOURI

BY Madi Balm DEPUTY


**IN THE 17TH JUDICIAL CIRCUIT COURT OF JOHNSON COUNTY, MISSOURI**

<b>Judge or Division :</b> R. MICHAEL WAGNER ( 38176 ) DIVII		<b>Case Number :</b> 10JO-CR00696-01 <input type="checkbox"/> Change of Venue from	
		Offense Cycle No : V2001570	
State Of Missouri vs. Defendant:STEPHANIE DAWN KEYS(KEYSD7239) 620 E CHRISTOPHER WARRENSBURG MO 64093		Assistant Prosecuting Attorney/MO Bar No: JULIE ANNETTE HIGHLEY ( 44994 )  Defense Attorney/MO Bar No : LANCE A. RIDDLE ( 36775 )	
DOB : 26-Jul-1977 SSN : ██████████ SEX : F		<div style="text-align: right; font-size: 2em; font-weight: bold; letter-spacing: 0.5em;">FILED</div> <div style="text-align: right; font-weight: bold;">JUL 19 2011</div> <div style="text-align: right; font-weight: bold;">STEPHANIE ELKINS Clerk - Circuit Court</div>	
Appeal Bond Set Date : Amount :			
<b>Judgment</b>			

Charge #	Charge Date	Charge Code	Charge Description
<b>Original Charge :</b> 1	20-Jul-2009	1977500	Commission Of Fraudulent Insurance Act (Felony D RSMo : 375.991)
<b>Disposition :</b>	18-Jul-2011	Guilty Plea	

<b>Order Date :</b>	18-Jul-2011	<b>Sentence or SIS :</b>	Suspended Imposition of Sent.
<b>Length :</b>	5 Years	<b>Start Date :</b>	18-Jul-2011
<b>Text :</b>	DEFENDANT PLACED ON FIVE YEARS SIS SUPERVISED PROBATION. DEFENDANT TO SERVE 2 DAYS SHOCK TIME IN THE JOHNSON COUNTY JAIL BEGINNING 8/12/11 AT 7 PM.		

Charge #	Charge Date	Charge Code	Charge Description
<b>Original Charge :</b> 2	15-Jun-2009	1977500	Commission Of Fraudulent Insurance Act (Felony D RSMo : 375.991)
<b>Disposition :</b>	18-Jul-2011	Guilty Plea	

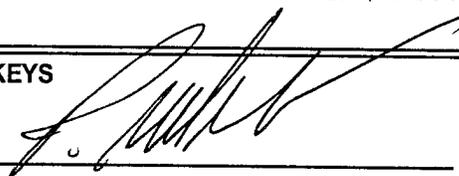
<b>Order Date :</b>	18-Jul-2011	<b>Sentence or SIS :</b>	Suspended Imposition of Sent.
<b>Length :</b>	5 Years	<b>Start Date :</b>	18-Jul-2011
<b>Text :</b>	DEFENDANT PLACED ON FIVE YEARS SIS SUPERVISED PROBATION. DEFENDANT TO SERVE 2 DAYS SHOCK TIME IN THE JOHNSON COUNTY JAIL BEGINNING 8/12/11 AT 7 PM.		
<b>Program :</b>	PROBATION	<b>Agency :</b>	Missouri Board of Probation & Parole
<b>Classification :</b>	SUPERVISED		
<b>Associated To :</b>	Charge 1, Charge 2		
<b>Start Date :</b>	18-Jul-2011	<b>Due to End:</b>	18-Jul-2016

REC'D FEB 18 2014

The Court further orders:  
Judgment entered in favor of the State of Missouri and against the defendant for the sum of \$46.00 for the Crime Victims Compensation fund. Judgment is not satisfied.

So Ordered on: 10JO-CR00696-01 ST V STEPHANIE DAWN KEYS

7-17-11  
Date

  
Judge

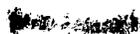
I certify that the above is a true copy of the original Judgment and Sentence of the court in the above cause, as it appears on record in my office.

(Seal of Circuit Court)

Issued on:

\_\_\_\_\_  
Date

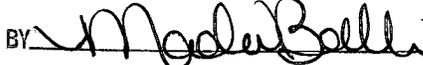
\_\_\_\_\_  
Clerk



REC'D FEB 13 2014  
2-11-14

I HEREBY ATTEST AND CERTIFY ON  
THAT THE FOREGOING DOCUMENT IS A FULL, TRUE, AND  
COMPLETE COPY OF THE ORIGINAL ON FILE IN MY OFFICE  
AND IN MY LEGAL CUSTODY.

STEPHANIE ELKINS  
CLERK OF THE CIRCUIT COURT  
JOHNSON COUNTY, MISSOURI

BY  DEPUTY Page 2 of 2

IN THE CIRCUIT COURT OF JOHNSON COUNTY,  
MISSOURI, AT WARRENSBURG  
CIRCUIT DIVISION

**FILED**  
JOHNSON COUNTY, MO

DEC 30 2010

STEPHANIE ELKINS  
CLERK - CIRCUIT COURT

STATE OF MISSOURI )

Plaintiff, )

VS )

CASE NO. 10JO-CR00696

OCN

STEPHANIE DAWN KEYS )

956 E. Market Street )

Warrensburg, MO 64093 )

SSN: [REDACTED] )

DOB: 07/26/1977 W/F )

Defendant. )

PA File No. 101083547

**FELONY INFORMATION**

STATE OF MISSOURI )

ss.

COUNTY OF JOHNSON )

Lynn M. Stopy, Prosecuting Attorney of the County of Johnson, State of Missouri,  
charges that Stephanie Dawn Keys committed the following offense(s):

**COUNT I Fraudulent Insurance**

Charge Code Number: 19775990

In violation of Section 375.991, RSMo, committed the class D felony of fraudulent insurance act, punishable upon conviction under Sections 375.991, 558.011, and 560.011, RSMo, in that on or about July 20, 2009, in the County of Johnson, State of Missouri, the defendant presented to United States Auto Association, an insurer a claim for payment pursuant to an insurance policy for personal insurance, which claim the defendant knew contained and/or concealed materially false information concerning a material fact thereto for the purpose of misleading United States Auto Association.

**REC'D FEB 13 2014**

**COUNT II Commission Of Fraudulent Insurance Act**  
 Charge Code Number: 19775990

In violation of Section 375.991, RSMo, committed the class D felony of fraudulent insurance act, punishable upon conviction under Sections 375.991, 558.011, and 560.011, RSMo, in that on or about June 15, 2009, in the County of Johnson, State of Missouri, the defendant presented to United States Auto Association, an insurer, a claim for payment pursuant to an insurance policy for personal insurance, which claim the defendant knew contained and/or ~~concealed~~ concealed materially false information concerning a material fact thereto for the purpose of misleading United States Auto Association.

LYNN M. STOPPY  
 Johnson County Prosecuting Attorney



Nathan L. Chapman, #60978  
 Assistant Prosecuting Attorney  
 Johnson County, Missouri

REC'D FEB 13 2014

I HEREBY ATTEST AND CERTIFY ON 2-11-14  
 THAT THE FOREGOING DOCUMENT IS A FULL, TRUE, AND  
 COMPLETE COPY OF THE ORIGINAL ON FILE IN MY OFFICE  
 AND IN MY LEGAL CUSTODY.

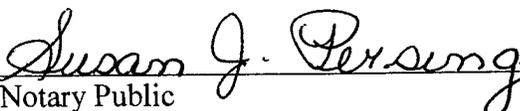
STEPHANIE ELKINS  
 CLERK OF THE CIRCUIT COURT  
 JOHNSON COUNTY, MISSOURI

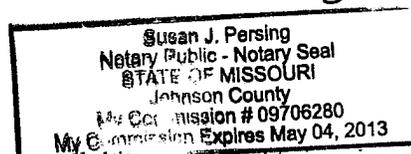
BY Michael Balli DEPUTY

Nathan L Chapman, Assistant Prosecuting Attorney, County of Johnson, State of Missouri, being duly sworn, upon oath states that the facts and matters set forth in the foregoing information are true, according to his/her best knowledge, information and belief.

  
 Nathan L Chapman, #60978  
 Assistant Prosecuting Attorney

Subscribed and sworn to before me this 30<sup>th</sup> day of December, 2010.

  
 Notary Public



**RANGE OF PUNISHMENT:**

Class A felony - a term of years not less than ten years and not to exceed thirty years, or life imprisonment;  
 Class B felony - a term of years not less than five years and not to exceed fifteen years;  
 Class C felony - a term of years not to exceed seven years and/or a fine not to exceed five thousand dollars;  
 Class D felony - a term of years not to exceed four years and/or a fine not to exceed five thousand dollars;  
 Class A misdemeanor - a term not to exceed one year and/or a fine not to exceed one thousand dollars;  
 Class B misdemeanor - a term not to exceed six months and/or a fine not to exceed five hundred dollars;  
 Class C misdemeanor - a term not to exceed fifteen days and/or a fine not to exceed three hundred dollars;  
 Infraction - a fine not to exceed two hundred dollars.

**Witness**

Donna Bartlett, Warrensburg Police Department, 102 S. Holden St., Warrensburg, MO 64093  
 Trisha Espinosa, P.O. Box 34176, San Antonio, TX 78265  
 Robert Edward Mulhearn, 7005 Hawthorne Avenue, Kansas City, MO 64133  
 United Services Auto Assoc., Prosecuting Atty. Office, Warrensburg, MO 64093  
 Jason Allen Withrich, 956 E. Market, Warrensburg, MO 64093

REC'D FEB 13 2014

IN THE CIRCUIT COURT OF JOHNSON COUNTY,  
MISSOURI, AT WARRENSBURG

STATE OF MISSOURI )  
)  
Plaintiff, )  
VS )  
)  
STEPHANIE DAWN KEYS )  
956 E. Market Street )  
Warrensburg, MO 64093 )  
SSN: [REDACTED] )  
DOB: 07/26/1977 W/F )  
Defendant. )

CASE NO.  
OCN

FILED  
AUG 16 2010

1050-CR000696

STEPHANIE ELKINS  
Clerk - Circuit Court

PA File No. 101083547

**FELONY COMPLAINT**

STATE OF MISSOURI )SS.  
)  
COUNTY OF JOHNSON )

Comes now Lynn M. Stopy, the Prosecuting Attorney of the County of Johnson, State of Missouri, upon information and belief, charges that the defendant Stephanie Dawn Keys

**COUNT I Fraudulent Insurance Act**  
Charge Code Number: 19775990

In violation of Section 375.991, RSMo, committed the class D felony of fraudulent insurance act, punishable upon conviction under Sections 375.991, 558.011, and 560.011, RSMo, in that on or about July 20, 2009, in the County of Johnson, State of Missouri, the defendant presented to United States Auto Association, an insurer a claim for payment pursuant to an insurance policy for personal insurance, which claim the defendant knew contained and/or concealed materially false information concerning a material fact thereto for the purpose of misleading United States Auto Association.

**COUNT II Fraudulent Insurance Act**  
Charge Code Number: 19775990

REC'D FEB 13 2014

In violation of Section 375.991, RSMo, committed the class D felony of fraudulent insurance act, punishable upon conviction under Sections 375.991, 558.011, and 560.011,

RSMo, in that on or about June 15, 2009, in the County of Johnson, State of Missouri, the defendant presented to United States Auto Association, an insurer, a claim for payment pursuant to an insurance policy for personal insurance, which claim the defendant knew contained and/or concealed materially false information concerning a material fact thereto for the purpose of misleading United States Auto Association.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and is submitted as a basis upon which this court may find the existence of probable cause for the issuance of the warrant.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

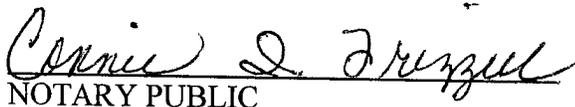
LYNN M. STOPPY  
Johnson County Prosecuting Attorney



Nathan L. Chapman, #60978  
Assistant Prosecuting Attorney  
Johnson County, Missouri

Subscribed and sworn to before me this 16th day of August, 2010.

Connie I. Frizzell  
Notary Public - Notary Seal  
STATE OF MISSOURI  
Johnson County  
My Commission # 09805412  
My Commission Expires June 01, 2013

  
NOTARY PUBLIC

RANGE OF PUNISHMENT

- Class A felony - a term of years not less than ten years and not to exceed thirty years, or life imprisonment;
- Class B felony - a term of years not less than five years and not to exceed fifteen years;
- Class C felony - a term of years not to exceed seven years and/or a fine not to exceed five thousand dollars;
- Class D felony - a term of years not to exceed four years and/or a fine not to exceed five thousand dollars;
- Class A misdemeanor - a term not to exceed one year and/or a fine not to exceed one thousand dollars;
- Class B misdemeanor - a term not to exceed six months and/or a fine not to exceed five hundred dollars;
- Class C misdemeanor - a term not to exceed fifteen days and/or a fine not to exceed two hundred dollars.
- Infraction - a fine not to exceed two hundred dollars.

REC'D FEB 13 2014

THIS INSTRUMENT IS A TRUE AND COMPLETE COPY OF THE ORIGINAL ON FILE IN MY OFFICE AND IN MY LEGAL CUSTODY. 2-11-14

STEPHANIE ELKINS  
CLERK OF THE CIRCUIT COURT  
JOHNSON COUNTY, MISSOURI

BY  DEPUTY

IN THE CIRCUIT COURT OF JOHNSON COUNTY, MISSOURI  
AT WARRENSBURG  
ASSOCIATE CIRCUIT DIVISION

STATE OF MISSOURI, )  
)  
Plaintiff, )  
)  
vs. )

Case No.  
Agency Case No: 2010-07948

Stephanie Dawn Keys  
956 E. Market St.  
Warrensburg, MO. 64093  
DOB: 7/26/1977  
SSN: [REDACTED]

Defendant. )

**PROBABLE CAUSE STATEMENT**

STATE OF MISSOURI )  
) SS.  
COUNTY OF JOHNSON )

I, Donna Bartlett, upon my oath, and under penalty of perjury, states as follows:

1. I have probable cause to believe that Stephanie D. Keys, 7/26/1977, committed one or more criminal offenses.

2. The facts supporting this belief are as follows:

On June 9, 2009 Stephanie Withrich's divorce was finalized from Jason Withrich. Stephanie then changed her name to Stephanie Keys. Stephanie currently lives at 956 E. Market St. in Warrensburg, Johnson County, Missouri.

On June 15, 2009, Stephanie called USAA (United States Auto Association) to report that her son has flushed her wedding ring and engagement ring down the toilet. She advised that the plumber could not retrieve the rings. Stephanie was informed that the rings were not covered Jason's current policy. Stephanie never told USAA that she and Jason were divorced.

**REC'D FEB 13 2014**

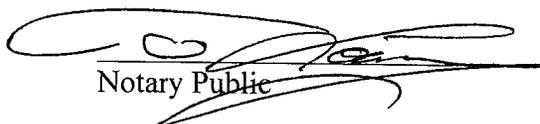
On June 30, 2009, Stephanie called USAA and obtained a VPP policy with \$3,000 blanket jewelry coverage. On July 9, 2009, Stephanie adjusted the VPP policy to schedule the same wedding and engagement rings, and increased the policy to \$4,000.

On July 20, 2009, Stephanie contacted USAA and reported the same wedding ring and engagement ring, a sapphire ring, and a bangle bracelet lost or stolen from the White

Water Park in Branson, Missouri on July 18, 2009. When USAA asked for pictures of the jewelry, Stephanie sent in a picture of the bracelet that was taken on July 22, 2009, after the date of loss. A claim was paid out to Stephanie in the amount of \$5,973.51, to an account in her name at First Central Bank. The claim was deposited in her account on August 13, 2009.

  
\_\_\_\_\_  
Donna Bartlett, Affiant

Subscribed and sworn to before me this 24 day of June, 2010.

  
Notary Public

TIM LOWRY  
Notary Public - Notary Seal  
State of Missouri  
Commissioned for Johnson County  
My Commission Expires: August 12, 2013  
Commission Number: 09402823

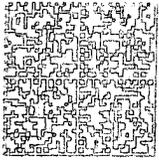
REC'D FEB 13 2014

STATE OF MISSOURI  
DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION  
PO BOX 480  
JEFFERSON CITY MO 65102-0480  
MO 500-2041 (9-99)



7006 0100 0005 2165 0755

FIRST CLASS



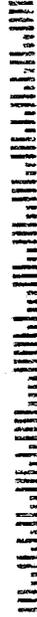
*UNCLAIMED*

Ms. Stephanie D. Keys  
809 Vest Dr.  
Warrensburg, MO 64093

*3-15-14*  
*7-12-14*  
*7-22-14*

NIXIE 649933021-1N 07/24/14

RETURN TO SENDER  
UNCLAIMED  
UNABLE TO FORWARD  
RETURN TO SENDER



53  
7  
9/9/14