

Exhibit A

**BEFORE THE ADMINISTRATIVE HEARING COMMISSION
STATE OF MISSOURI**

W. DALE FINKE, Director)	
Department of Insurance)	
State of Missouri,)	
 Petitioner,)	
)	
v.)	Case Number 05-1829DI
)	05122241C
VIRGIL LEE JACKSON,)	
)	
 Respondent.)	

FIRST AMENDED COMPLAINT

W. Dale Finke, Director of the Missouri Department of Insurance, for his First Amended Complaint against Respondent, states as follows:

INFORMATION RELEVANT TO ALL COUNTS

1. Petitioner is the Director of the Missouri Department of Insurance ("the Director") whose duties include, pursuant to Chapter 374, RSMo, the regulation, supervision and discipline of bail bond agents.
2. Respondent Virgil Lee Jackson ("Respondent") was issued a bail bond agent license by the Director, number BB303345, on July 29, 1996. The license is in good standing.
3. This Commission has jurisdiction of this Complaint pursuant to section 621.045, RSMo.

COUNT I

4. Respondent has been convicted of a crime of moral turpitude, a ground for discipline of Respondent's license under section 374.755.1(2), RSMo 2000.

5. The facts are as follows:

a. On or about October 15, 2002, in the Circuit Court of Lincoln County, Missouri, Case No. 45R010200414, Respondent was convicted of Promoting Gambling in the second degree (class A misdemeanor).

b. On or about October 15, 2002, in the Circuit Court of Lincoln County, Missouri, Case No. 45R010200414, Respondent was convicted of the crime of Possession of a Gambling Device (class A misdemeanor).

c. Such crimes are crimes of moral turpitude.

COUNT II

6. Respondent has violated a provision of or an obligation imposed by the laws of this state, a ground for discipline of Respondent's bail bond agent license under section 374.755.1(6), RSMo Cum. Supp. 2004.

7. The facts are as follows:

a. On October 15, 2002, Respondent pleaded guilty to, and was convicted of, the following act: knowingly advancing or profiting from unlawful gambling or lottery activity, in violation of section 572.040, RSMo 2000.

b. On October 15, 2002, Respondent pleaded guilty to, and was convicted of, the following act: with knowledge of the character thereof, manufactured, sold, transported, placed or possessed, or conducted or negotiated a transaction affecting or designed to affect ownership, custody or use of:

(1) A slot machine; or

(2) Another gambling device,

knowing or having reason to believe that it was to be used in the state of Missouri in the advancement of unlawful gambling activity, in violation of section 572.070, RSMo 2000.

8. Respondent thereby violated sections 572.040 and 572.070, RSMo 2000.

COUNT III

9. Respondent has attempted to obtain a license by fraud, deception or misrepresentation in securing a license, a ground for discipline of Respondent's bail bond agent license under section 374.755.1(3), RSMo Cum. Supp. 2004.

10. The facts are as follows:

a. On January 21, 2005, Respondent represented to the Director on his application for a general bail bond agent license that he had not been convicted of a misdemeanor within the past 15 years, intending that the Director rely on such misrepresentation in issuing a license, and

b. Respondent's representation was false. Respondent had previously been convicted of two (2) misdemeanors within the past fifteen (15) years, as follows:

1. Promoting Gambling in the second degree, Case No. 45R010200414, Circuit Court of Lincoln County, Missouri, October 15, 2002 (class A misdemeanor);

2. Possession of a Gambling Device, Case No. 45R010200414, Circuit Court of Lincoln County, Missouri, October 15, 2002 (class A misdemeanor).

c. Respondent knew that the representation was false, and

d. Respondent's representation was material to the Director's decision regarding whether or not to issue a general bail bond agent license to Respondent, and

e. The Director refused to issue a general bail bond agent license to Respondent on September 23, 2005.

COUNT IV

11. Respondent has violated a provision of or an obligation imposed by the laws of this state, a ground for discipline of Respondent's bail bond agent license under section 374.755.1(6), RSMo Cum. Supp. 2004.

12. The facts are as follows:

a. From February 18, 2005 through October 28, 2005, Respondent has acted as a general bail bond agent although not licensed as such by submitting documents to Missouri courts for the purpose of acting as a surety on bail bonds under the name of Missouri National Surety, Inc.

b. Neither Respondent nor Missouri National Surety, Inc. is licensed as a general bail bond agent. Also, Missouri National Surety, Inc. does not hold a certificate of authority from the Missouri Department of Insurance to engage in the surety business.

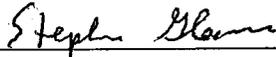
c. Respondent's actions violated sections 374.702.1, 374.702.5 and 374.710.1, RSMo Cum. Supp. 2004.

WHEREFORE, Petitioner requests that this Commission find cause to discipline the bail bond agent license of Respondent.

Respectfully submitted,

W. DALE FINKE, Director

Missouri Department of Insurance



By: Stephen R. Gleason, Senior Counsel, #30593

Missouri Department of Insurance

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ATTORNEY FOR PETITIONER:

W. Dale Finke, Director

Missouri Department of Insurance