

**FILED**

MAY 23 2006

ADMINISTRATIVE HEARING  
COMMISSION

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

**W. DALE FINKE, Director** )  
**Department of Insurance** )  
**State of Missouri,** )  
**Petitioner,** )  
 )  
**v.** )  
**VIRGIL LEE JACKSON,** )  
 )  
**Respondent.** )

**Case Number 05-1829DI**

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**PETITIONER'S MOTION FOR LEAVE TO AMEND COMPLAINT**

COMES NOW Petitioner, W. Dale Finke, and pursuant to 1 CSR 15-3.350 hereby moves for leave to amend Petitioner's Complaint. In support thereof, the Director states as follows:

1. The Director filed a Complaint on December 22, 2005, with the Administrative Hearing Commission alleging that sufficient cause exists for disciplining Respondent's bail bond agent license.

2. The Director has determined that there are additional grounds for cause to discipline Respondent's license that were not pleaded in the Complaint filed on December 22, 2005. (See new Counts I and II of Petitioner's First Amended Complaint, attached hereto as Exhibit A)

3. The Director hereby requests that the Commission deem Petitioner's First Amended Complaint as filed in this case.

**WHEREFORE,** Petitioner respectfully requests that the Commission grant Petitioner's Motion for Leave to Amend.

Respectfully submitted,

*Steph Gleason*

STEPHEN R. GLEASON  
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Department of Insurance  
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ATTORNEY FOR PETITIONER  
W. Dale Finke, Director  
Missouri Department of Insurance

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of the foregoing, including all attachments, was mailed first class, with sufficient postage attached, via the United States Postal Service on this 23rd day of May, 2006 to:

Chet Pleban  
Pleban & Associates, LLC  
Attorneys at Law  
2010 South Big Bend Boulevard  
St. Louis, MO 63117

Attorney for Respondent

*Steph Gleason*  
Stephen Gleason