

BEFORE THE ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI

**FILED**  
JAN 05 2007  
ADMINISTRATIVE HEARING  
COMMISSION

DOUGLAS OMMEN, Director, )  
Department of Insurance, Financial )  
Institutions and Professional Registration,)  
State of Missouri, )  
Petitioner, )

v. )

Case Number 06-0823277C

ULIS R. VICKERS, )  
Serve at: )  
490 12<sup>th</sup> Street )  
Tonganoxie, KS 66086 )

KRISTIN VICKERS, and )  
Serve at: )  
490 12<sup>th</sup> Street )  
Tonganoxie, KS 66086 )

U&K INVESTMENTS, INC., )  
Serve at: )  
Ulis R. Vickers, President )  
490 12<sup>th</sup> Street )  
Tonganoxie, KS 66086 )

Respondents. )

COMPLAINT

Douglas Ommen, Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, for his Complaint against Respondents, states as follows:

INFORMATION RELEVANT TO ALL COUNTS

1. Petitioner is the Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration ("the Director") whose duties include, pursuant to Chapter 374, RSMo, the regulation, supervision and discipline of bail bond agents.

2. Respondent Ulis R. Vickers ("Respondent Ulis Vickers") was issued a bail bond agent license by the Director, number BB299914, on February 11, 2003. The license was surrendered effective October 5, 2006.

3. Respondent Kristin M. Vickers ("Respondent Kristin Vickers") was issued a bail bond agent license by the Director, number BB369757, on April 25, 2006. The license was surrendered effective October 5, 2006.

4. Respondent U&K Investments, Inc. ("Respondent U&K") was issued a general bail bond agent license by the Director, number GB8021304, on April 25, 2006. The license was surrendered effective October 5, 2006. At all times mentioned in this Complaint Respondent Ulis Vickers was the sole owner and officer of Respondent U&K.

5. This Commission has jurisdiction of this Complaint pursuant to section 621.045, RSMo.

### COUNT I

6. Respondent Ulis Vickers has used fraud, deception, misrepresentation or bribery in securing a license or in obtaining permission to take an examination required pursuant to sections 374.695 to 374.755, a ground for discipline under sections 374.755.1(3), RSMo Cum. Supp. (2005) and 374.755.1(3), RSMo (2000).

7. The facts are as follows:

a. On his original application for license in 2003 and also on his renewal application for license dated March 9, 2005, Respondent Ulis Vickers misrepresented his state of residency to the Director by claiming that he was a resident of the state of Missouri when, in fact, he was a resident of the state of Kansas and has been a resident of the state of Kansas at all times since he first applied for licensure with the Director in 2003.

- b. Respondent Ulis Vickers knew that such misrepresentation was false.
- c. The Director relied on such misrepresentation and issued a Missouri bail bond agent license to Respondent Ulis Vickers.

### **COUNT II**

8. Respondent Ulis Vickers has violated a provision of or an obligation imposed by the laws of this state or department of insurance rules and regulations, or aided or abetted other persons to violate such laws or rules or regulations, a ground for discipline under sections 374.755.1(6), RSMo Cum. Supp. (2005) and 374.755.1(6), RSMo (2000).

9. The facts are as follows:

a. The Director reallages and incorporates herein by reference all of the allegations contained in paragraphs 1-7 of this Complaint.

b. Respondent Ulis Vickers thereby violated 20 CSR 700-6.170 (1) and (3).

### **COUNT III**

10. Respondent Kristin Vickers has used fraud, deception, misrepresentation or bribery in securing a license or in obtaining permission to take an examination required pursuant to sections 374.695 to 374.755, a ground for discipline under sections 374.755.1(3), RSMo Cum. Supp. (2005) and 374.755.1(3), RSMo (2000).

11. The facts are as follows:

a. On her application for license dated April 17, 2006, Respondent Kristin Vickers misrepresented her state of residency to the Director by claiming that she was a resident of the state of Missouri when, in fact, she was a resident of the state of Kansas and has been a resident of the state of Kansas at all times since she applied for licensure with the Director.

- b. Respondent Kristin Vickers knew that such misrepresentation was false.
- c. The Director relied on such misrepresentation and issued a Missouri bail bond

agent license to Respondent Kristin Vickers.

#### COUNT IV

12. Respondent Kristin Vickers has violated a provision of or an obligation imposed by the laws of this state or department of insurance rules and regulations, or aided or abetted other persons to violate such laws or rules or regulations, a ground for discipline under sections 374.755.1(6), RSMo Cum. Supp. (2005) and 374.755.1(6), RSMo (2000).

13. The facts are as follows:

a. The Director reallages and incorporates herein by reference all of the allegations contained in paragraphs 1-11 of this Complaint.

b. Respondent Kristin Vickers thereby violated 20 CSR 700-6.170 (1) and (3).

#### COUNT V

14. Respondent U&K has used fraud, deception, misrepresentation or bribery in securing a license or in obtaining permission to take an examination required pursuant to sections 374.695 to 374.755, a ground for discipline under sections 374.755.1(3), RSMo Cum. Supp. (2005) and 374.755.1(3), RSMo (2000).

15. The facts are as follows:

a. The Director reallages and incorporates herein by reference all of the allegations contained in paragraphs 1-13 of this Complaint.

b. On Respondent U&K's April 17, 2006 application for license, Respondent Ulis Vickers misrepresented to the Director that Respondent U&K's business office was

located in the state of Missouri when, in fact, the business office was located in the state of Kansas and has been located in the state of Kansas at all times since Respondent U&K applied for licensure with the Director.

- c. Respondent Ulis Vickers knew that such misrepresentation was false.
- d. The Director relied on such misrepresentation and issued a Missouri general bail bond agent license to Respondent U&K.
- e. At all times mentioned in this Complaint, Respondent Ulis Vickers was the sole officer and owner of Respondent U&K. At all times mentioned in this Complaint, Respondent Ulis Vickers was acting on behalf of Respondent U&K.

#### COUNT VI

16. Respondent U&K has violated a provision of or an obligation imposed by the laws of this state or department of insurance rules and regulations, or aided or abetted other persons to violate such laws or rules or regulations, a ground for discipline under sections 374.755.1(6), RSMo Cum. Supp. (2005) and 374.755.1(6), RSMo (2000).

- 17. The facts are as follows:
  - a. The Director reallages and incorporates herein by reference all of the allegations contained in paragraphs 1-15 of this Complaint.
  - b. Respondent U&K thereby violated 20 CSR 700-6.170 (1) and (3).
  - c. At all times mentioned in this Complaint, Respondent Ulis Vickers was the sole officer and owner of Respondent U&K. At all times mentioned in this Complaint, Respondent Ulis Vickers was acting on behalf of Respondent U&K.

WHEREFORE, Petitioner requests that this Commission find cause to discipline the bail bond agent license of Respondent Ulis Vickers, the bail bond agent license of Respondent Kristin Vickers and the general bail bond agent license of Respondent U&K.

Respectfully submitted,

Douglas Ommen, Director  
Missouri Department of Insurance, Financial  
Institutions and Professional Registration



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