

BEFORE THE ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI

**FILED**  
NOV 09 2006  
ADMINISTRATIVE HEARING  
COMMISSION

W. DALE FINKE, Director, )  
Missouri Department of )  
Insurance, Financial Institutions and )  
Professional Registration, )  
 )  
Petitioner, )  
v. )  
 )  
DONALD E. CHRISTIAN, )  
 )  
Respondent. )  
 )  
Serve at: )  
101 E. Athey Street, )  
Farber, MO 63345-1026 )

CASE NO. 061109327C

**COMPLAINT**

W. Dale Finke, Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, through counsel, complains and requests that the Administrative Hearing Commission find that cause exists for disciplinary action against Respondent Donald E. Christian because:

1. Petitioner is the Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, whose duties, pursuant to RSMo Chapters 374 and 375 include the supervision and regulation of licensed bail bond agents.
2. Respondent Christian is a licensed bail bond agent (license # BB344898) in the state of Missouri. Respondent Christian's license is currently active.
3. This Commission has jurisdiction over this Complaint pursuant to § 621.100 and § 621.045 and § 536.100-140, RSMo 2000.
4. Respondent Christian has been adjudicated guilty and entered a plea of guilty within the past fifteen years in a criminal prosecution under state or federal law for a felony or a

crime involving moral turpitude whether or not sentence was imposed, prior to issuance of license date, a ground for discipline under § 374.755.1(2), RSMo (Cum. Supp. 2005).

5. The facts are as follows:

a. On or about October 20, 1998, Respondent was adjudicated guilty and entered a plea of guilty to the Class C felony of Possession of a Controlled Substance, in the Circuit Court of Montgomery County, State of Missouri (Case # 98-CR-155313) in violation of § 195.202, RSMo.

6. As a result sufficient grounds exist for disciplining Respondent's bail bond agent license under § 374.755.1(2), RSMo (Cum. Supp. 2005).

**WHEREFORE**, based on the foregoing, Petitioner respectfully requests that the Commission make findings of facts and conclusions of law stating that Petitioner has established cause to discipline the bail bond agent license of Respondent Christian, pursuant to RSMo § 374.755.1(2), RSMo (Cum. Supp. 2005).

Respectfully submitted,

  
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