

BEFORE THE ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI

**FILED**

MAR 05 2010

ADMINISTRATIVE HEARING  
COMMISSION

DIRECTOR, DEPARTMENT OF INSURANCE, )  
FINANCIAL INSTITUTIONS AND )  
PROFESSIONAL REGISTRATION, )  
STATE OF MISSOURI, )

Petitioner, )

vs. )

ANTHONY RAY KING, )

Respondent. )

Serve: )

Anthony Ray King )  
1354 Tulip Lane )  
Joplin, Missouri 64801 )

Case No.:

COMPLAINT

JOHN M. HUFF, Director of the Missouri Department of Insurance, Financial Institutions, and Professional Registration, through counsel, complains and requests the Administrative Hearing Commission find that cause exists for disciplinary action against Respondent, Anthony Ray King, because:

INFORMATION RELEVANT TO ALL COUNTS

1. Petitioner is the Director ("Director") of the Missouri Department of Insurance, Financial Institutions, and Professional Registration, whose duties include, pursuant to chapter 374, RSMo, the regulation, supervision, and discipline of bail bond agents.
2. The Missouri Department of Insurance, Financial Institutions, and Professional Registration ("the Department"), originally issued a bail bond agent license to Anthony Ray

King (“Respondent”) on December 10, 2007, which expired on December 10, 2009 (License Number 0407931).

3. The Commission has jurisdiction over this Complaint pursuant to § 621.045, RSMo (2000).

### COUNT I

4. Respondent failed to respond to multiple inquiries by the Department within 20 days. Such is a violation of 20 CSR 100-4.100(2)(A) and a ground for discipline of Respondent’s bail bond agent license pursuant to § 374.755.1(6), RSMo (Supp. 2009).

5. The facts are as follows:

- a. On August 11, 2009, Special Investigator Les Hogue (“Hogue”) mailed a letter to Respondent at 1354 Tulip Lane, Joplin, Missouri 64801, requesting an explanation regarding a charge of Class C felony stealing. Hogue requested a response by September 8, 2009. This letter was not returned undeliverable.
- b. Respondent did not respond to the August 11, 2009 letter.
- c. On August 26, 2009, Hogue mailed a letter to Respondent at 1354 Tulip Lane, Joplin, Missouri 64801, requesting an explanation regarding allegations made in a complaint by Nikki Rush. Hogue requested a response by September 23, 2009. This letter was not returned undeliverable.
- d. Respondent did not respond to the August 26, 2009 letter.

### COUNT II

6. Petitioner realleges and expressly incorporates by reference the allegations in paragraphs 4 and 5.

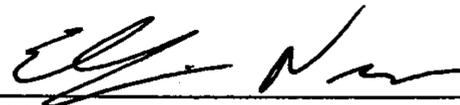
7. Respondent did not appear before the Director as ordered by a subpoena. Such is a ground for discipline of Respondent's bail bond agent license pursuant to § 374.210.2, RSMo (Supp. 2009).

8. The facts are as follows:

- a. On October 14, 2009, the Director issued a Subpoena Duces Tecum ordering Respondent to appear at the Department of Insurance, Financial Institutions, and Professional Registration offices located at the Harry S Truman State Office Building, Room 540, 301 West High Street, Jefferson City, Missouri, on November 12, 2009, at 1:00 p.m.
- b. The Subpoena Duces Tecum was sent via certified mail to Respondent at 1354 Tulip Lane, Joplin, Missouri 64801. A PS Form 3811, or "Green Card," was signed and returned to the Department.
- c. On November 12, 2009, at 1:00 p.m., Respondent failed to appear for the subpoena conference.

**WHEREFORE**, based on the foregoing, Petitioner respectfully requests the Commission make findings of fact and conclusions of law stating that Petitioner has established cause to discipline Respondent Anthony Ray King's bail bond agent license pursuant to §§ 374.755.1(6) and 374.210.2, RSMo (Supp. 2009).

Respectfully submitted,



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**ATTORNEY FOR PETITIONER**  
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