

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

**DIRECTOR OF DEPARTMENT OF  
INSURANCE, FINANCIAL  
INSTITUTIONS & PROFESSIONAL  
REGISTRATION,**

**Petitioner,**

vs.

**DOUGLAS L. ROACH,**

**Respondent.**

**Serve:**

**245 NE Bay View Dr.  
Lee's Summit, Missouri 64064  
(816) 478-3989**

**Case No.:** \_\_\_\_\_

**FILED**

**AUG 07 2009**

**ADMINISTRATIVE HEARING  
COMMISSION**

**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, Douglas L. Roach, because:

1. Petitioner is the Director of the Department of Insurance, Financial Institutions and Professional Registration ("the Director"). The Director has the duty to administer Chapters 374 and 375, RSMo, which includes the supervision, regulation, and discipline of insurance producers licensed to operate and conduct business in the state of Missouri.

2. The Missouri Department of Insurance, Financial Institutions and Professional Registration ("the Department") originally issued Douglas L. Roach ("Respondent") an insurance producer license on May 22, 2008, which is currently active and set to expire on May 22, 2010 (License Number 0301022).

3. The Commission has jurisdiction over this Complaint pursuant to § 621.045, RSMo (Supp. 2008).

4. Respondent has had an insurance producer license, or its equivalent, denied, suspended or revoked in another state, province, district or territory, which is a ground for discipline under § 375.141.1(9), RSMo (Supp 2008).

5. The facts are as follows:

a. On March 4, 2009, the Commissioner of Insurance of the State of Kansas revoked Respondent's Kansas insurance agent license in *In the Matter of the Kansas Resident Insurance Agent's License of Douglas L. Roach*, Docket No. 3929-SO, Final Order.

6. As a result, sufficient grounds exist for disciplining Respondent's Missouri insurance license pursuant to § 375.141.1(9), RSMo (Supp. 2008).

WHEREFORE, based on the foregoing, Petitioner respectfully requests that the Commission make findings of fact and conclusions of law stating that Petitioner has established cause to discipline Douglas L. Roach's Missouri insurance producer license pursuant to § 375.141.1(9), RSMo (Supp. 2008).

Respectfully submitted,



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ATTORNEY FOR PETITIONER  
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