

July 15, 2026

ADMINISTRATIVE
HEARING COMMISSION

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

DIRECTOR OF THE DEPARTMENT)
OF PUBLIC SAFETY)
P.O. Box 749)
Jefferson City, MO 65012)

Petitioner,)

v.)

Case No. _____

CHRISTINA MOSER)
117 E Park Dr,)
Bowling Green, MO 63334)
Respondent.)

COMPLAINT FOR DISCIPLINE OF PEACE OFFICER LICENSE

The Director of the Department of Public Safety, through counsel, brings this complaint seeking discipline of Respondent's peace officer license and states as follows:

General Allegations

1. Petitioner is the Director of the Department of Public Safety ("Director"), who has the authority to issue, suspend, or revoke peace officer licenses as outlined in Chapter 590 of the Revised Statutes of Missouri

(“RSMo”)¹ and the Rules and Regulations of the Missouri Department of Public Safety.

2. Respondent Christina Moser is licensed as a class A peace officer by the Missouri Department of Public Safety. Respondent currently holds license number 71497. This license is currently active and was active at all times relevant herein.

3. Respondent is currently commissioned by the Pike County Sheriff’s Office (PCSO) and was so at all times relevant herein.

4. Section 590.080 states when the Director has either actual or constructive knowledge of cause to discipline a peace officer, he may file a complaint with the Administrative Hearing Commission as provided by Chapter 621.

5. Section 590.080 states in relevant part:

2. The director shall have cause to discipline any peace officer licensee who:

* * *

(2) Has committed any criminal offense, whether or not a criminal charge has been filed. . .;

(3) Has committed any act that involves moral turpitude or a reckless disregard for the safety of the public or any person;

¹ All Statutory Citations are to the current Missouri Revised Statutes, unless otherwise indicated.

* * *

- (9) Has committed any act of gross misconduct indicating inability to function as a peace officer.

6. Pursuant to Chapters 590 and 621, this Commission has jurisdiction over the allegations in this Complaint and the authority to ascertain whether cause exists for the Director to discipline Respondent's peace officer license.

Facts Common to All Counts

7. The Director incorporates paragraphs 1 through 6 above as if fully set forth herein.

8. On or about February 4, 2024, Deputy Christina Moser was responding to a wrong way driver on US 61, in Pike County, Missouri.

9. Upon locating the vehicle she initiated a traffic stop on US 61.

10. Deputy Moser made contact with the driver Gabriel Coultas, and requested he provide his identification.

11. Coultas refused and rolled up his window.

12. Deputy Moser attempted unsuccessfully to break the glass of Coultas' vehicle as he was driving away.

13. Deputy Moser resumed her pursuit of Coultas, traveling northbound in the southbound lanes of US 61.

14. Sgt. Peters of the Bowling Green Police Department set up stop sticks in the path of Coultas' vehicle.

15. Coultas brought his vehicle to a stop at Sgt. Peters' location.

16. Sgt. Peters and Deputy Moser approached the vehicle with their weapons drawn.

17. Sgt. Peters ordered Coultas to open his door.

18. At that time, Coultas had no visible injuries to his face.

19. Coultas resisted being removed from his vehicle.

20. Sgt. Peters took Coultas to the ground, but Coultas continued to resist arrest.

21. Sgt. Peters struck Coultas in the face in order to gain his compliance.

22. Coultas was evaluated by EMS personnel on scene.

23. They observed Coultas to be bleeding from a small laceration to the right side of his head.

24. Deputy Moser completed a probable cause statement, made under oath, and she affirmed the information in the statement was true and accurate to the best of her knowledge, information, and belief.

25. The form used for the probable cause statement bears notice that false statements made on the form are punishable by law.

26. In the probable cause statement Deputy Moser swore that, before Sgt. Peters removed Coultas from his vehicle, she “observed a head wound on [Coultas’] right eyebrow, where there was dried blood on his face nearby his eyebrow.”

27. Deputy Moser also reported she and Sgt. Peters “applied multiple pain compliance strikes to the upper torso area. . . [and] more pain compliance strikes to the upper torso area...”

**Count I: Cause for Discipline under § 590.080.2(2) for the Commission
of the Criminal Offense of Making a False Report, Violation of
§ 575.080**

28. The Director incorporates all prior paragraphs as if fully set forth herein.

29. It is unlawful to make a false report or cause a false report to be made to a law enforcement officer, security officer, fire department or other organization, official or volunteer, which deals with emergencies involving danger to life or property. § 575.080 RSMo.

30. Deputy Moser misrepresented the facts in her probable cause statement when she reported that Coultas already had an injury and dried blood on his face before being removed from his vehicle.

31. Deputy Moser further misrepresented the facts in her probable cause statement when she reported officers used pain compliance strikes to the upper torso area of Coultas.

32. Deputy Moser further misrepresented the facts in her probable cause statement when she failed to report that Coultas was struck in the face by Sgt. Peters.

Count II: Cause for Discipline under § 590.080.2(3) for the Commission of Acts of Moral Turpitude or Reckless Disregard for the Safety of the Public or Any Person

33. The Director incorporates paragraphs 1 through 32 as if fully set forth herein.

34. Deputy Moser included fraudulent statements and/or omissions in her probable cause statement.

35. In doing so, Deputy Moser committed an act of moral turpitude which is cause for discipline under § 590.080.2(3).

Count III: Cause for Discipline under § 590.080.2(9) for the commission of any act of gross misconduct indicating inability to function as a peace officer

36. The Director incorporates paragraphs 1 through 35 as if fully set forth herein.

37. Deputy Moser included fraudulent statements and/or omissions in her probable cause statement.

38. In doing so, Deputy Moser committed gross misconduct which is cause for discipline under § 590.080.2(9).

For these reasons, the Director asks this Commission to find there is cause to discipline Respondent's peace officer license and for any other relief this Commission deems just and proper.

Respectfully submitted,

CATHERINE L. HANAWAY
Attorney General

/s/ Jeffrey A. Suddy Jr
JEFFREY A. SUDDY JR
Assistant Attorney General
Missouri Bar #74370
P.O. Box 899
Jefferson City, MO 65102
(573) 751-8868

Attorneys for Petitioner