

No. 2022-7339

**Official Order  
of the  
Texas Commissioner of Insurance**

**Date:** 06/15/2022

**Subject Considered:**

Helen Kristine Spears  
[REDACTED]  
Richland Hills, TX 76118

Default Order  
SOAH Docket No. 454-22-0776  
TDI Enforcement File No. 24860

**General remarks and official action taken:**

The subject of this default order is whether a general lines license should be issued to Helen Kristine Spears (Respondent), and whether Respondent's temporary general lines license should be revoked based upon her criminal history. Respondent did not appear at the hearing on the merits. This order denies Respondent's license application and revokes Respondent's temporary general lines license.

The following findings of fact and conclusions of law are adopted:

**Findings of Fact**

Failure to Appear at Hearing on the Merits

1. On February 2, 2022, the Texas Department of Insurance (TDI) filed an Amended Notice of Hearing, attached as Exhibit A, and an Amended Petition, attached as Exhibit B, with the State Office of Administrative Hearings.
2. TDI's factual allegations set out in the attached Amended Notice of Hearing and Amended Petition are incorporated in this order as findings of fact.

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Commissioner's Order

Helen Kristine Spears

SOAH Docket No. 454-22-0776

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3. TDI served Respondent's counsel at the time with the Amended Notice of Hearing and Amended Petition via email sent through the State Office of Administrative Hearing's E-File system. The Amended Notice of Hearing and Amended Petition were also sent by fax to Respondent's counsel at the time.
4. Respondent was represented by counsel until March 14, 2022, when the State Office of Administrative Hearings granted her former counsel's motion to withdraw in Order No. 4, attached as Exhibit C.
5. After receiving proper notice of the date, time, and location of the hearing on the merits, Respondent failed to appear for the hearing on May 16, 2022, as shown in the record in SOAH Docket No. 454-22-0776.

### Conclusions of Law

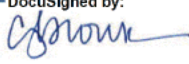
1. The commissioner has jurisdiction under Texas law, including TEX. INS. CODE §§ 82.051–82.055, 4001.002, 4001.102, 4001.151, 4001.153, 4001.155, 4001.156, 4005.101, 4005.102, and 4054.051, 28 TEX. ADMIN. CODE § 1.502; TEX. OCC. CODE §§ 53.021–53.023, and TEX. GOV'T CODE §§ 2001.051–2001.178.
2. The commissioner has authority to dispose of this case informally under TEX. GOV'T CODE § 2001.056; TEX. INS. CODE § 82.055; and 28 TEX. ADMIN. CODE §§ 1.47, 1.88, and 1.89.
3. TDI provided proper notice of the hearing under TEX. GOV'T CODE §§ 2001.051, 2001.052, and 2001.054, and 28 TEX. ADMIN. CODE §§ 1.28, 1.88, 1.89, and 19.906.
4. Based on Respondent's failure to appear in person or by legal representative at the hearing, TDI is entitled to disposition by default under 28 TEX. ADMIN. CODE §§ 1.88 and 1.89.
5. TDI's factual and legal allegations set out in the attached Notice of Hearing and Original Petition are incorporated in this order and deemed admitted as true under 28 TEX. ADMIN. CODE § 1.89.

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Helen Kristine Spears  
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## Order

It is ordered that Helen Kristine Spears's application is denied. It is further ordered that any licenses held by Helen Kristine Spears are revoked. A copy of this order will be provided to law enforcement or other appropriate administrative agencies for further investigation as may be warranted.

DocuSigned by:  
  
FC5D7EDDFB4F8... \_\_\_\_\_  
Cassie Brown  
Commissioner of Insurance

Prepared and reviewed by:

  
\_\_\_\_\_  
Kaycee Crisp, Attorney  
Enforcement

# 2022-7339

Commissioner's Order  
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## Affidavit

**STATE OF TEXAS** §

§

**COUNTY OF TRAVIS** §

Before me, the undersigned authority, personally appeared David Moreno, who, being by me duly sworn, deposed as follows:

"My name is David Moreno and I am employed by the Texas Department of Insurance. I am of sound mind, capable of making this affidavit, and have personal knowledge of these facts which are true and correct.

I have reviewed TDI's records concerning Helen Kristine Spears. I have confirmed that:

- a. The file maintained by Enforcement contains an Amended Notice of Hearing and Amended Petition dated February 2, 2022, which were filed with the State Office of Administrative Hearings.
- b. On February 2, 2022, the Amended Notice of Hearing and Amended Petition were served on Respondent's counsel at that time via email sent through the State Office of Administrative Hearings' E-File system and via fax.

Copies of the Notification of Service and the fax confirmation maintained by Enforcement are attached as Exhibit D and Exhibit E, respectively."

DocuSigned by:

*David Moreno*

88E63243257748E... \_\_\_\_\_

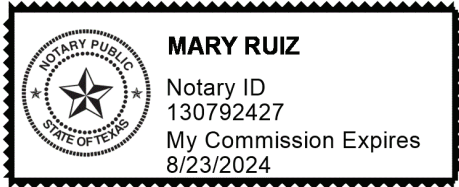
Affiant

# 2022-7339

Commissioner's Order  
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SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 5/19/2022. This notarial act was an online notarization.

## Notary Seal



## Digital Certificate

DocuSigned by:  
*Mary Ruiz*  
795DC4D59167489...  
Notary Public State of Texas

**2022-7339**

FILED  
454-22-0776  
2/2/2022 10:24 AM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Jessie Harbin, CLERK

**SOAH DOCKET NO. 454-22-0776  
TDI ENFORCEMENT FILE NO. 24860**

ACCEPTED  
454-22-0776  
2/2/2022 11:08 AM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Jessie Harbin, CLERK

**TEXAS DEPARTMENT OF INSURANCE,**

**Petitioner**

**v.**

**HELEN KRISTINE SPEARS, aka  
KRYSTINE JAMES, and fka HELEN  
KRISTINE CHAMPION,**

**Respondent**

**BEFORE THE STATE OFFICE**

**OF**

**ADMINISTRATIVE HEARINGS**

**AMENDED NOTICE OF HEARING**

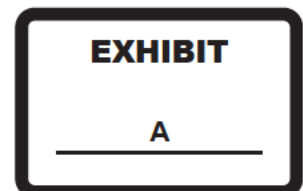
The Texas Department of Insurance seeks to take disciplinary action against you and deny your license application. This Amended Notice of Hearing and the Amended Petition, which is attached and incorporated for all purposes, states the allegations against you and the relief sought by the Department.

A public hearing will be held before an Administrative Law Judge on **Tuesday, February 15, 2022, at 9:00 a.m.** The hearing will take place via videoconference using a videoconference platform controlled by the State Office of Administrative Hearings, unless otherwise ordered to proceed in another manner by the Administrative Law Judge.

The hearing shall be conducted under TEX. GOV'T CODE, ch. 2001 and 1 TEX. ADMIN. CODE, ch. 155. Unless otherwise directed by the Administrative Law Judge, the hearing shall continue from day to day in the offices of the State Office of Administrative Hearings until concluded. You have the right to appear at this hearing and to be represented by an attorney.

**Parties that are not represented by an attorney may obtain information regarding contested case hearings on the public website of the State Office of Administrative Hearings at [www.soah.texas.gov](http://www.soah.texas.gov), or in printed format upon request to SOAH.**

**YOU MUST FILE A WRITTEN RESPONSE TO THE NOTICE OF HEARING WITH THE STATE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 20 DAYS OF THE DATE THE NOTICE OF HEARING WAS MAILED. FAILURE TO FILE A WRITTEN RESPONSE BY**



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Amended Notice of Hearing  
Helen Kristine Spears  
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**THIS DEADLINE SHALL ENTITLE TDI TO SEEK DISPOSITION BY DEFAULT UNDER 1 TEX. ADMIN. CODE § 155.501 AND 28 TEX. ADMIN. CODE §§ 1.88 AND 1.89.**

**IF YOU FAIL TO FILE A WRITTEN RESPONSE, THE SCHEDULED HEARING CAN BE CANCELED AND WITHOUT FURTHER NOTICE TO YOU THE COMMISSIONER OF INSURANCE CAN ISSUE AN ORDER IN WHICH THE ALLEGATIONS IN THE NOTICE OF HEARING ARE DEEMED ADMITTED AS TRUE AND THE RELIEF SOUGHT IN THE NOTICE OF HEARING, INCLUDING REVOCATION OF YOUR TEMPORARY LICENSE, AND/OR DENIAL OF YOUR LICENSE APPLICATION, IS GRANTED BY DEFAULT.**

**IF YOU FILE A WRITTEN RESPONSE BUT THEN FAIL TO APPEAR ON THE DAY AND TIME SET FOR HEARING, WITHOUT FURTHER NOTICE TO YOU, THE COMMISSIONER OF INSURANCE CAN ISSUE AN ORDER IN WHICH THE ALLEGATIONS IN THE NOTICE OF HEARING ARE DEEMED ADMITTED AS TRUE AND THE RELIEF SOUGHT IN THE NOTICE OF HEARING, INCLUDING REVOCATION OF YOUR TEMPORARY LICENSE, AND/OR DENIAL OF YOUR LICENSE APPLICATION, IS GRANTED BY DEFAULT.**

In accord with 28 TEX. ADMIN. CODE § 1.90(e) and 1 TEX. ADMIN. CODE §§ 155.101 and 155.103, you should send copies of your written response to:

- (1) *(by mail, fax, or electronically)*  
Docketing Division  
State Office of Administrative Hearings  
300 West 15th Street, Room 504  
P.O. Box 13025  
Austin, Texas 78711-3025  
(512) 322-2061 (Fax);  
[www.soah.texas.gov/e-filing-soah](http://www.soah.texas.gov/e-filing-soah)
  
- (2) *(by mail, fax, or email)*  
Chief Clerk  
Texas Department of Insurance  
P.O. Box 12030, MC GC-CCO  
Austin, Texas 78711-2030  
(512) 490-1064 (Fax)  
[chiefclerk@tdi.texas.gov](mailto:chiefclerk@tdi.texas.gov); and

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- (3) *(by mail, fax, or email)*  
Kaycee Crisp, Staff Attorney  
Texas Department of Insurance  
Enforcement Division, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 490-1020 (Fax)  
kaycee.crisp@tdi.texas.gov

### **Receiving Documents Electronically and Filing Documents with SOAH**

The State Office of Administrative Hearings (SOAH) offers you the ability to electronically receive orders and other documents issued by SOAH by email instead of by mail. If you want to receive SOAH-issued documents by email, follow the instructions on SOAH's website: [www.soah.texas.gov](http://www.soah.texas.gov).

A request to receive SOAH-issued documents by email does not change the procedures you must follow to file documents with SOAH. You may file documents with SOAH by mail, fax, or electronically. To file electronically, you must use eFileTexas. Instructions on using eFileTexas are on SOAH's website. SOAH's website also includes guidance for representing yourself.

### **Important Security Notice** (for In-Person Hearings ONLY)

**ALL VISITORS TO THE WILLIAM P. CLEMENTS BUILDING WITHOUT AN AGENCY OR DPS ISSUED ID CARD MUST PROVIDE THE BUILDING SECURITY OFFICER WITH THE STATE OFFICE OF ADMINISTRATIVE HEARINGS DOCKET NUMBER AND RECEIVE A VISITOR'S PASS IN ORDER TO BE ALLOWED ACCESS TO THE HEARING ROOM. INDIVIDUALS SHOULD ALLOW ADDITIONAL TIME TO GO THROUGH THE SECURITY PROCESS.**



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Helen Kristine Spears  
SOAH Docket No. 454-22-0776  
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If you have any questions, please contact me at the address or telephone number shown below.

Respectfully Submitted,



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Kaycee Crisp  
State Bar No. 24057368  
Texas Department of Insurance  
Enforcement Division, MC110-1A  
P.O. Box 149104  
Austin, Texas 78714-9104  
(512) 676-6327 (Direct)  
(512) 490-1020 (Fax)  
Kaycee.Crisp@tdi.texas.gov

ATTORNEY FOR THE PETITIONER  
TEXAS DEPARTMENT OF INSURANCE

Enclosure: Amended Petition

cc: Leah Gillum, Deputy Commissioner, Enforcement Division, MC ENF  
Rachel Cloyd, Litigation Director, Enforcement Division, MC ENF  
Administrative Review, MC CO-AAL

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Helen Kristine Spears  
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### CERTIFICATE OF SERVICE

I, Kaycee Crisp, certify that a true and correct copy of the *Amended Notice of Hearing and the Amended Petition* were sent by the following methods shown on this 2nd day of February, 2022 to:

Frank King  
Bertolino LLP

[REDACTED]  
Austin, Texas 78746-5575  
*Counsel for Respondent*

Via Fax: [REDACTED]  
Via Email: [REDACTED]



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Kaycee Crisp

**2022-7339**

FILED  
454-22-0776  
2/2/2022 10:24 AM  
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ADMINISTRATIVE HEARINGS  
Jessie Harbin, CLERK

**SOAH DOCKET NO. 454-22-0776  
TDI ENFORCEMENT FILE NO. 24860**

ACCEPTED  
454-22-0776  
2/2/2022 11:08 AM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Jessie Harbin, CLERK

**TEXAS DEPARTMENT OF INSURANCE,**

**BEFORE THE STATE OFFICE**

**Petitioner**

**v.**

**OF**

**HELEN KRISTINE SPEARS, aka  
KRYSTINE JAMES, and fka HELEN  
KRISTINE CHAMPION,**

**ADMINISTRATIVE HEARINGS**

**Respondent**

**AMENDED PETITION**

The Texas Department of Insurance (TDI) seeks to take disciplinary action against Helen Kristine Spears and to deny her license application. TDI previously filed an Original Petition and is now amending those allegations. Specifically, TDI corrects the cause number cited in factual allegation paragraph 24. In support of this amended petition, TDI makes the following allegations upon information and belief:

**Jurisdiction**

The Commissioner of Insurance has jurisdiction over this matter pursuant to TEX. INS. CODE §§ 82.051–82.055, 4001.002, 4005.101, 4001.102, 4001.151, 4001.153, 4001.155, 4001.156, 4005.102, and 4054.051, 28 TEX. ADMIN. CODE § 1.502; TEX. OCC. CODE §§ 53.021–53.023, and TEX. GOV'T CODE §§ 2001.051–2001.178.

**Factual Allegations**

Permanent Agent License Application

1. On March 9, 2020, Helen Kristine Spears (Spears) applied for a general lines license with a life, accident, and health qualification.
2. On May 8, 2020, TDI proposed to deny Spears’s application.
3. On May 12, 2020, Spears appealed TDI’s decision and requested a hearing.

**EXHIBIT**

**B**

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Helen Kristine Spears  
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- Spears is also presently known as and is publicly holding herself out under an assumed name, specifically Krystine James, which she intentionally did not disclose in her application submitted to TDI.

### Background on Temporary Licenses

- Texas Insurance Code Chapter 4001, Subchapter D gives TDI authority to issue a temporary agent license to an applicant who is being considered for appointment as an agent by another agent, insurer, or HMO.
- Texas Insurance Code Section 4001.153<sup>1</sup> states in part: "The department *shall issue* a temporary license immediately on receipt of a properly completed application . . ." (emphasis added).
- Effective September 1, 2021, H.B. 3420 (87<sup>th</sup> R.S.) and H.B. 2819 (87<sup>th</sup> R.S.) amended Section 4001.153, giving TDI statutory authority to deny a temporary license application if grounds exist under Insurance Code Section 4005.101 or Chapter 53 of the Occupations Code. Section 4 of H.B. 2819 clarifies implementation of the new law stating: "The changes in law made by this Act apply *only* to an application for a temporary insurance agent's license *submitted on or after the effective date of this Act*. An application for a temporary insurance agent's license submitted before the effective date of this Act is governed by the law as it existed immediately before that date, and that law is continued in effect for that purpose." (emphasis added).
- Therefore, if an applicant submitted a properly completed temporary agent license application prior to September 1, 2021, TDI must issue the temporary license and has no discretion to deny it.

### Temporary Agent License Application

- On March 24, 2020, TDI issued Commissioner's Bulletin No. B-0008-20 in response to Governor Abbott's suspension of certain licensing requirements and fees to cope with the COVID-19 pandemic. The bulletin provided a temporary waiver of testing, fingerprints, and additional fees associated with licensure. The bulletin also stated the temporary licenses issued will remain active until further notice.

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<sup>1</sup> All citation to Section 4001.153 in this Original Petition refers to the law in effect prior to H.B. 3420 (87<sup>th</sup> R.S.) and H.B., 2819 (87<sup>th</sup> R.S.), both of which bills went into effect September 1, 2021.

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10. Despite having already appealed the proposed denial of her general lines license application, on December 22, 2020, Helen Kristine Spears (Spears) applied for a temporary general lines license with a life, accident, and health qualification.
11. Pursuant to the legislative mandate in Section 4001.153 of the Texas Insurance Code, TDI was required to issue, and could not propose to deny Spears a temporary general lines agent license with a life, accident, and health qualification because her application was submitted to TDI prior to September 1, 2021. That temporary license was granted on November 5, 2021.
12. On November 5, 2021, TDI sent Spears a notification letter to inform Spears that her temporary license was granted, but that due to the serious nature of her criminal history, the Commissioner of Insurance did not issue her the required waiver under 18 U.S.C. § 1033 (1033 waiver). Spears was informed that to act lawfully as a temporary agent, she also needs a 1033 waiver from the Commissioner. Without such a waiver, Spears may not conduct the business of insurance in the State of Texas without potentially violating federal law and subjecting herself to federal prosecution.
13. TDI seeks to revoke the temporary license under Insurance Code Section 4005.101 because of Spears's criminal background and conduct, described below.

### Criminal History

14. Spears is formerly known as Helen Kristine Champion. Spears's criminal offenses described below are all under her former last name of Champion.
15. On July 9, 1999, Spears pleaded guilty to and was convicted of a misdemeanor Theft By Check charge in docket number 0659479 in Tarrant County, Texas. Spears was sentenced to 48 days confinement in the State Jail Division of the Texas Department of Criminal Justice.
16. On June 4, 1999, Spears pleaded guilty to a felony Forgery by Possession of a Check with Intent to Pass charge in docket number 0732607W in Tarrant County, Texas. Spears was placed on deferred adjudication and sentenced to five years community supervision and a \$500 fine.

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17. On February 29, 2000, Criminal District Court Number One of Tarrant County, Texas entered a new Judgment Adjudicating Guilt on the charge in docket number 0732607W. The judgment stated the reasons were Spears's failure to pay court costs and relevant fees, failure to submit a urine sample twice a week per the terms of her deferred adjudication, and failure to complete counseling/treatment in the substance abuse treatment facility aftercare program per the terms of her deferred adjudication.
18. The new Judgment Adjudicating Guilt sentenced Spears to 18 months confinement with the Texas Department of Criminal Justice.
19. On May 11, 2004, Spears pleaded guilty to and was convicted of a misdemeanor Theft by Check charge in docket number 0860326 in Tarrant County, Texas. Spears was sentenced to 35 days in jail with her time to be served via a labor detail.
20. On June 1, 2004, the Tarrant County Sheriff's Department issued a letter to the Tarrant County Court noting that Spears had been released from the labor detail unit due to her excessive absences and requesting that a warrant be issued for Spears's arrest for the remainder of her sentence. Accordingly, on June 8, 2004, the County Criminal Court No. 9 of Tarrant County, Texas issued a Capias Pro Finum Warrant authorizing Spears's arrest until her sentence was satisfied. The warrant was executed on June 27, 2004.
21. On August 3, 2004, County Criminal Court No. 9 in Tarrant County, Texas ordered Spears to serve time in jail for failure to pay court costs via monthly installments as previously ordered.
22. On July 8, 2004, Spears pleaded guilty to and was convicted of a misdemeanor Possession of Marijuana charge in docket number 0938893 in Tarrant County, Texas. Spears was sentenced to 30 days confinement in Tarrant County jail.
23. On July 23, 2004, Spears pleaded guilty to and was convicted of a felony Forgery by Possession of a Check with Intent to Pass charge in docket number 0940552 in Tarrant County, Texas. Spears was sentenced to 180 days in state jail.
24. On October 13, 2005, Spears pleaded guilty to and was convicted of a felony Forgery by Possession of a Check with Intent to Pass charge in docket number

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0975068D in Tarrant County, Texas. Spears was sentenced to three years incarceration with the Texas Department of Criminal Justice.

25. On January 25, 2008, Spears pleaded guilty to and was convicted of a misdemeanor Failure to Identify/Using False Information charge in docket number 1097648 in Tarrant County, Texas. Spears was sentenced to ten days confinement in Tarrant County jail.
26. On June 25, 2008, Spears pleaded guilty to and was convicted of a felony Fraudulent Use/Possession of Identifying Info charge in docket number 1115016W in Tarrant County, Texas. Spears was sentenced to four years confinement with the Texas Department of Criminal Justice.
27. On June 11, 2010, Spears pleaded guilty to and was convicted of a misdemeanor Theft of Services charge in docket number 1202201 in Tarrant County, Texas. Spears was sentenced to 26 days confinement in Tarrant County jail.
28. On December 16, 2010, Spears pleaded guilty to and was convicted of a misdemeanor Possession of a Controlled Substance charge in docket number 1221289 in Tarrant County, Texas. Spears was sentenced to 43 days confinement in Tarrant County jail.
29. On December 16, 2010, Spears pleaded guilty to and was convicted of a misdemeanor Failure to ID/Providing False or Fictitious Identification Information charge in docket number 1221284 in Tarrant County, Texas. Spears was sentenced to 43 days confinement in Tarrant County jail.
30. On December 16, 2010, Spears pleaded guilty to and was convicted of a misdemeanor Driver's License/False ID charge in docket number 1221281 in Tarrant County, Texas. Spears was sentenced to 43 days confinement in Tarrant County jail.
31. On March 12, 2012, Spears pleaded guilty to and was convicted of a felony Forgery of a Financial Instrument charge in docket number F45971 in Johnson County, Texas. Spears was sentenced to five years confinement with the Texas Department of Criminal Justice.

32. On March 12, 2012, Spears pleaded guilty to and was convicted of two counts of felony Tampering with a Government Record and one count of felony Fraudulent Use of Identifying Info in docket number F45911 in Johnson County, Texas. Spears was sentenced to six years confinement with the Texas Department of Criminal Justice.
33. On October 23, 2015, Spears was released from incarceration to complete her sentences on parole.
34. On October 10, 2017, Spears was discharged from parole.

### **Legal Allegations**

1. Spears has committed acts for which a license holder may be disciplined under TEX. INS. CODE §§ 4005.101 and 4005.102, because she:
  - a. intentionally made a material misstatement in her license application in violation of TEX. INS. CODE § 4005.101(b)(2) by failing to disclose an assumed name as required by 28 TEX. ADMIN. CODE § 19.902(a);
  - b. attempted to obtain a license by fraud or misrepresentation in violation of TEX. INS. CODE § 4005.101(b)(2), by failing to disclose an assumed name, as required by in 28 TEX. ADMIN. CODE § 19.902(a); and,
  - c. has engaged in fraudulent or dishonest acts or practices, in violation of TEX. INS. CODE § 4005.101(b)(5).
2. Spears has been convicted of multiple felonies pursuant to TEX. INS. CODE § 4005.101(b)(8) and TEX. OCC. CODE § 53.021(a)(1).
3. Spears has committed felony and misdemeanor offenses and has engaged in fraudulent or dishonest activity that directly relate to the duties and responsibilities of the licensed occupation, as contemplated in 28 TEX. ADMIN. CODE § 1.502(d) and (f).
4. Spears committed offenses that the department considers to be of such a serious nature that they are of prime importance in determining fitness for licensure, as



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contemplated by 28 TEX. ADMIN. CODE § 1.502(e)(1), (e)(4)(F), and TEX. OCC. CODE §§ 53.021–53.023.

5. TDI guidelines, 28 TEX. ADMIN. CODE § 1.502(c)-(e), emphasize that TDI:
  - a. considers it very important that applicants be honest, trustworthy, and reliable;
  - b. may refuse to issue an original license if TDI determines that the applicant has committed a felony or misdemeanor that directly relates to the duties and responsibilities of the licensed occupation;
  - c. considers the offenses of Theft by Check, Forgery by Possession of a Check with Intent to Pass, Failure to Identify/Using False Information, Fraudulent Use/Possession of Identifying Information, Theft of Services, Driver's License/False ID, Forgery of a Financial Instrument, and Tampering with a Government Record to be of such a serious nature that they are of prime importance when determining fitness for licensure. 28 TEX. ADMIN. CODE § 1.502(e)(1); and
  - d. considers the offenses of Theft by Check and Theft of Services to be of such a serious nature that they are of prime importance when determining fitness for licensure. 28 TEX. ADMIN. CODE § 1.502(e)(4)(F).
6. Spears has been convicted of multiple felonies involving dishonesty or breach of trust, as specified in 18 U.S.C. § 1033, and requiring written consent from the Commissioner of Insurance to engage or participate in the business of insurance.

### Relief Sought

If one or more of the above allegations is found to be true, TDI asks the Administrative Law Judge to enter a Proposal for Decision recommending that the Commissioner of Insurance issue an order:

1. revoking Helen Kristine Spears's temporary agent license;
2. denying Helen Kristine Spears's general lines license application;

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3. denying consent to allow Helen Kristine Spears to engage or participate in the business of insurance under 18 U.S.C. § 1033; and
4. imposing any other just and appropriate relief to which the department may be entitled to by law, including any combination of the above actions.

Respectfully Submitted,



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Kaycee Crisp  
State Bar No. 24057368  
Texas Department of Insurance  
Enforcement Division, MC110-1A  
P.O. Box 149104  
Austin, Texas 78714-9104  
(512) 676-6327 (Direct)  
(512) 490-1020 (Fax)  
Kaycee.Crisp@tdi.texas.gov

ATTORNEY FOR THE PETITIONER  
TEXAS DEPARTMENT OF INSURANCE

FILED **2022-7339**  
454-22-0776  
3/14/2022 2:36 PM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Jessie Harbin, CLERK

ACCEPTED  
454-22-0776  
3/14/2022 3:37 PM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Jessie Harbin, CLERK

**SOAH DOCKET NO. 454-22-0776.C**

<b>TEXAS DEPARTMENT OF INSURANCE,</b>	§	<b>BEFORE THE STATE OFFICE</b>
<b>Petitioner</b>	§	
	§	
<b>v.</b>	§	<b>OF</b>
	§	
<b>HELEN KRISTINE SPEARS, A/K/A</b>	§	
<b>KRYSTINE JAMES, AND F/K/A</b>	§	
<b>HELEN KRISTINE CHAMPION,</b>	§	
<b>Respondent</b>	§	<b>ADMINISTRATIVE HEARINGS</b>

**ORDER NO. 4  
GRANTING MOTION FOR WITHDRAWAL FROM REPRESENTATION**

On March 8, 2022, Respondent’s counsel, Frank A. King, filed a Motion for Withdrawal from Representation. The Administrative Law Judge finds that the motion presents good cause for withdrawal and complies with 1 Texas Administrative Code § 155.203.

Therefore, it is **ORDERED** that the Motion for Withdrawal from Representation is **GRANTED**, that Frank A. King and the Bertolino LLP are discharged as attorneys for Respondent, and that Mr. King and Bertolino LLP are **ORDERED** to update eFile Texas with service information for Respondent.

**SIGNED March 14, 2022.**

  
**REBECCA S. SMITH**  
**ADMINISTRATIVE LAW JUDGE**  
**STATE OFFICE OF ADMINISTRATIVE HEARINGS**

**EXHIBIT**

            
C

**From:** [REDACTED]  
**To:** [Kaycee Crisp](#)  
**Subject:** Notification of Service for Case: 454-22-0776, for filing Notice of Hearing, Envelope Number: 61379186  
**Date:** Wednesday, February 2, 2022 10:25:28 AM

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# Notification of Service



Case Number: 454-22-0776  
Case Style:  
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<b>Case Style</b>	
<b>Date/Time Submitted</b>	2/2/2022 10:24 AM CST
<b>Filing Type</b>	Notice of Hearing
<b>Filing Description</b>	Amended Notice of Hearing and Amended Original Petition_454-22-0776_TDI 24860_Spears
<b>Filed By</b>	Mary Ruiz
<b>Service Contacts</b>	Texas Department of Insurance/ Enforcement Division:  Rachel Cloyd (Rachel.Cloyd@tdi.texas.gov)  Leah Gillum (Leah.Gillum@tdi.texas.gov)  Texas Department of Insurance (Enforcementgeneral@tdi.texas.gov)  Kaycee Crisp (Kaycee.Crisp@tdi.texas.gov)  Catarina Tapia (Catarina.Tapia@tdi.texas.gov)  Chief Clerk:

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2022-7339

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