

No. 2024-9021

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

**Date:** 12/12/2024

**Subject Considered:**

Crystal Lynn Brooks  
San Antonio, TX 78240

Default Order  
TDI Enforcement File No. 33357

**General remarks and official action taken:**

This is a default order taken against Crystal Lynn Brooks (Respondent) because she engaged in dishonest conduct by filing a false personal property insurance claim, has no appointments required to conduct the business of insurance, and failed to respond to the department's inquiry. Respondent did not respond to a Notice of Allegations mailed by the Texas Department of Insurance (TDI). This order revokes Respondent's license.

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

**Findings of Fact**

Failure to Respond to Notice of Allegations

1. On November 5, 2024, TDI sent a Notice of Allegations, attached as Exhibit A, to Respondent.
2. TDI sent the Notice of Allegations to Respondent's last known address provided in writing to the department, [REDACTED], San Antonio, TX 78240.
3. Respondent received and waived an opportunity for a hearing because Respondent failed to send TDI a written response to the Notice of Allegations within 20 days after the date the Notice of Allegations was mailed.

# 2024-9021

Commissioner's Order

Crystal Lynn Brooks

Page 2 of 4

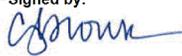
4. TDI's factual allegations set out in the attached Notice of Allegations are incorporated in this order as findings of fact.

## Conclusions of Law

1. The commissioner has jurisdiction under Texas law, including TEX. INS. CODE §§ 82.051-82.055, 4001.002, 4001.102, 4001.105, 4005.101-4005.105, 4101.051, 4051.051; and TEX. GOV'T CODE §§ 2001.003(1) and 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.
3. TDI provided proper notice to Respondent under TEX. GOV'T CODE §§ 2001.003(1), 2001.051, 2001.052, 2001.054, and 2001.056(4); and 28 TEX. ADMIN. CODE §§ 1.28, 1.47, and 19.906.
4. Based on Respondent's failure to send TDI a written response to the Notice of Allegations, the department is entitled to disposition by default under 28 TEX. ADMIN. CODE § 1.47.
5. Respondent failed to show compliance with the law.
6. TDI's factual and legal allegations set out in the attached Notice of Allegations are incorporated in this order and deemed admitted as true under 28 TEX. ADMIN. CODE § 1.47.

## Order

It is ordered that any licenses held by Crystal Lynn Brooks 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.

Signed by:  
  
FC5D7EDDFFB4F8...

Cassie Brown  
Commissioner of Insurance

**2024-9021**

Commissioner's Order

Crystal Lynn Brooks

Page 3 of 4

Prepared and reviewed by:



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Nancy Williams, Staff Attorney  
Enforcement

# 2024-9021

Commissioner's Order

Crystal Lynn Brooks

Page 4 of 4

## 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 Crystal Lynn Brooks. I have confirmed that:

- a. The last mailing address provided to the department in writing by Crystal Lynn Brooks is [REDACTED], San Antonio, TX 78240.
- b. The file maintained by Enforcement contains a Notice of Allegations dated November 5, 2024, which was sent to Crystal Lynn Brooks.
- c. On November 5, 2024, the Notice of Allegations addressed to Crystal Lynn Brooks was mailed certified, return receipt requested, to her last known address.

A copy of the certified mail log maintained by Enforcement is attached as Exhibit B."

Signed by:

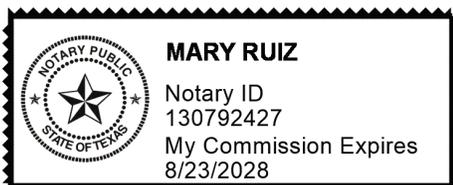
*David Moreno*

28A291438601436...

Affiant

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 11/25/2024. This notarial act was an online notarization.

### Notary Seal



### Digital Certificate

Signed by:

*Mary Ruiz*

795DC4D59167489...

Notary Public State of Texas

2024-9021



PO Box 12030 | Austin, TX 78711 | 800-578-4677 | tdi.texas.gov

November 5, 2024

Crystal Lynn Brooks  
[REDACTED]  
San Antonio, TX 78240

Via CM/RRR No. 9214 8901 9403 8386 6171 22

**TDI ENFORCEMENT CASE NO. 33357  
NOTICE OF ALLEGATIONS AGAINST CRYSTAL LYNN BROOKS**

The Texas Department of Insurance (TDI) seeks to take disciplinary action against you. This Notice states the allegations against you and the relief sought by TDI.

***YOUR WRITTEN RESPONSE IS REQUIRED WITHIN 20 DAYS***

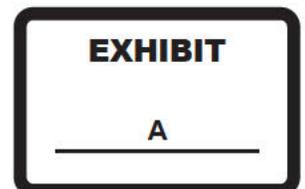
**YOU HAVE THE RIGHT TO A HEARING AND ARE INVITED TO SHOW COMPLIANCE WITH THE LAW.** To request a hearing, you must send a written response to TDI within 20 days of the date this Notice was mailed.

If you fail to send a written response by the deadline, *you waive your right to a hearing*, and TDI may seek disposition by default under 28 TEX. ADMIN. CODE § 1.47, TEX. INS. CODE § 82.055, and TEX. GOV'T. CODE § 2001.056.

If you fail to send a written response by the deadline, without further notice to you, the commissioner of insurance may issue a default order that admits the factual matters asserted, deems all allegations as true, and orders the relief recommended in this Notice.

You must send your written response by mail, fax, or email to:

Nancy Williams, Staff Attorney  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 490-1020 (Fax)  
nancy.williams@tdi.texas.gov



# 2024-9021

Notice of Allegations

Crystal Lynn Brooks

Page 2 of 4

## Jurisdiction

The commissioner of insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 4001.002, 4005.101, 4005.102, 4051.051; and TEX. GOV'T CODE §§ 2001.003(1) and 2001.051–2001.178.

## Factual Allegations

1. Crystal Lynn Brooks (Brooks) holds a personal lines property casualty agent license with a qualification in property and casualty issued by the TDI on June 20, 2022.
2. On or about December 22, 2022, United Services Automobile Association (USAA) initiated an investigation on Brooks, a USAA employee. The investigation revealed the following information:
  - a. On October 25, 2022, Brooks filed a personal property claim on her USAA policy for two necklaces with an October 11, 2022, purported date of loss.
  - b. A previous claim had been filed by Brooks for the same necklaces with a purported August 29, 2022, date of loss.
  - c. Brooks stated that she had no recollection of the previous claim, which she attributed to memory loss.
  - d. On December 21, 2022, a decision letter was sent to Brooks denying the October 25, 2022, claim, citing misrepresentation and concealment of material facts related to the loss.
3. On or about January 27, 2023, USAA terminated Brooks employment as a result of the investigation and notified TDI of the cancellation of appointment.
4. On January 11, 2024, TDI sent an inquiry letter to Brooks related to this matter. No response was received.
5. Brooks has no appointments to act as an agent for an insurer.

**Legal Allegations**

1. Brooks committed acts for which she may be disciplined under Tex. Ins. Code § 4005.101(b), including revocation of her license, as contemplated under Tex. Ins. Code § 82.051.
2. Brooks engaged in fraudulent or dishonest acts or practices, as contemplated under Tex. Ins. Code § 4005.101(b)(5).
3. Brooks failed to submit a required response to TDI's inquiry, as contemplated under TEX. INS. CODE § 38.001.
4. Brooks does not hold a required appointment to engage in the business of insurance, as contemplated under TEX. INS. CODE § 4001.201.

**Relief Sought**

TDI seeks the following relief:

1. revoking Brooks' license, and
2. 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,



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Nancy Williams  
State Bar No. 24058175  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 676-6338 (Direct)  
(512) 490-1020 (Fax)  
nancy.williams@tdi.texas.gov

# 2024-9021

Notice of Allegations

Crystal Lynn Brooks

Page 4 of 4

cc: Leah Gillum, Deputy Commissioner, Fraud and Enforcement Division, MC: ENF  
Whitney Fraser, Litigation Director, Enforcement, MC: ENF  
Administrative Review, MC: CO-AAL

## CERTIFICATE OF SERVICE

I, Nancy Williams, certify that a true and correct copy of this *Notice of Allegations Against Crystal Lynn Brooks* was sent by the following methods on November 5, 2024 to:

Crystal Lynn Brooks



San Antonio, TX 78240

Via CM/RRR No.: 9214 8901 9403 8386 6171 22

A handwritten signature in cursive script that reads "Nancy Williams".

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Nancy Williams

2024-9021



# Shipment Confirmation Acceptance Notice

## A. Mailer Action

**Note to Mailer:** The labels and volume associated to this form online, **must** match the labeled packages being presented to the USPS® employee with this form.

Shipment Date: 11/05/2024

Shipped From:

Name: ENF M RUIZ

Address: 1601 CONGRESS AVENUE

City: AUSTIN

State: TX ZIP+4® 78701

Type of Mail	Volume
Priority Mail Express®*	
Priority Mail®	
First-Class Package Service®	
Returns	
International*	
Other	1
Total	1

\*Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

## B. USPS Action

Note to RSS Clerk:

1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm
3. Scan or enter the barcode/label number from PS Form 5630
4. Confirm the volume count message by selecting Yes or No
5. Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail.  
Leave form with customer or in customer's mail receptacle.

USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0056 8044 15

WILLIAMS/33357

**EXHIBIT**

**B**



Firm Mailing Book For Accountable Mail

Name and Address of Sender
ENF M RUIZ
1601 CONGRESS AVENUE
STE 6.900
AUSTIN TX 78701

- Check type of mail or service
Adult Signature Required
Adult Signature Restricted Delivery
Certified Mail
Certified Mail Restricted Delivery
Collect on Delivery (COD)
Insured Mail
Priority Mail
Priority Mail Express
Registered Mail
Return Receipt for Merchandise
Signature Confirmation
Signature Confirmation Restricted Delivery

Affix Stamp Here
(for additional copies of this receipt).
Postmark with Date of Receipt.

2024-9021

Table with columns: USPS Tracking/Article Number, Postage, (Extra Service) Fee, Handling Charge, Actual Value, Insured Value, Due Sender if COD, ASR Fee, ASRD Fee, RD Fee, RR Fee, SC Fee, SCRD Fee, SH Fee. Includes address: CRYSTAL LYNN BROOKS, SAN ANTONIO, TX 78240.

Total Number of Pieces Listed by Sender: 1

Total Number of Pieces Received at Post Office: 1

Postmaster, Per (Name of receiving employee)