

No. 2025-9135

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

Date: 02/12/2025

Subject Considered:

Brooklyn Jessica Pope
Missouri City, Texas

Default Order
TDI Enforcement File No. 34314

General Remarks and Official Action Taken:

The subject of this default order is whether a general lines agent license with a property and casualty qualification should be issued to Brooklyn Jessica Pope (Respondent). Respondent did not respond to a Notice of Allegations mailed by the Texas Department of Insurance. This order denies Respondent's license application.

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

Findings of Fact

Failure to Respond to Notice of Allegations

1. On December 19, 2024, the department sent a Notice of Allegations, attached as Exhibit A, to Respondent.
2. The department sent the Notice of Allegations to Respondent's last known address provided in writing to the department, [REDACTED] Missouri City, Texas 77489.
3. Respondent received and waived an opportunity for a hearing because Respondent failed to send the department a written response to the Notice of Allegations within 20 days after the date the Notice of Allegations was mailed.

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Commissioner's Order

Brooklyn Jessica Pope

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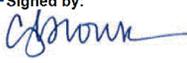
4. The department's factual allegations set out in the attached Notice of Allegations are incorporated in this order as findings of fact.

Conclusions of Law

1. The commissioner has jurisdiction under Texas law, including TEX. INS. CODE §§ 82.051-82.055, 4001.002, 4005.101, 4005.102, and 4051.051; TEX. OCC. CODE §§ 53.021-53.023; 28 TEX. ADMIN. CODE § 1.502; 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. The department 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 the department 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. The department'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 Brooklyn Jessica Pope's application is denied. 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:

FC5D7EDDFFBB4F8...

Cassie Brown

Commissioner of Insurance

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Commissioner's Order

Brooklyn Jessica Pope

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Prepared and reviewed by:

A handwritten signature in black ink that reads "Stephanie Andrews". The signature is written in a cursive style with a large, looped initial "S".

Stephanie Andrews, Staff Attorney
Enforcement

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Commissioner's Order

Brooklyn Jessica Pope

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Affidavit

STATE OF TEXAS §

§

COUNTY OF TRAVIS §

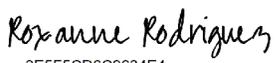
Before me, the undersigned authority, personally appeared Roxanne Rodriguez, who, being by me duly sworn, deposed as follows:

"My name is Roxanne Rodriguez 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 Brooklyn Jessica Pope. I have confirmed that:

- a. The last mailing address provided to the department in writing by Brooklyn Jessica Pope is [REDACTED], Missouri City, Texas 77489.
- b. The file maintained by Enforcement contains a Notice of Allegations dated December 19, 2024, which was sent to Brooklyn Jessica Pope.
- c. On December 19, 2024, the Notice of Allegations addressed to Brooklyn Jessica Pope was mailed certified, return receipt requested, to her last known address.

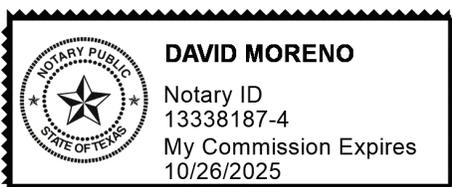
Copies of the first-class mail log and certified mail log maintained by Enforcement is attached as Exhibit B."

Signed by:


3E5F5CD6C9634E4...
Affiant

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 1/24/2025. This notarial act was an online notarization.

Notary Seal



Digital Certificate

DocuSigned by:


455E4109E15D4CD...
Notary Public State of Texas

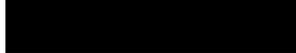
2025-9135



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

December 19, 2024

Brooklyn Jessica Pope



Missouri City, Texas 77489

Via CM/RRR No.: 9214 8901 9403 8392 6039 04

Via First Class Mail



Via Email

**TDI ENFORCEMENT CASE NO. 34314
NOTICE OF ALLEGATIONS AGAINST BROOKLYN JESSICA POPE**

The Texas Department of Insurance (TDI) seeks to deny your license application. This Notice states the allegations against you and the relief sought by TDI.

YOUR WRITTEN RESPONSE IS REQUIRED WITHIN 20 DAYS

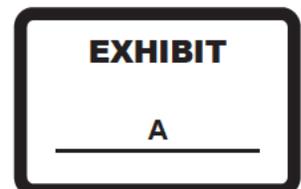
YOU HAVE THE RIGHT TO A HEARING AND ARE INVITED TO SHOW COMPLIANCE WITH THE LAW. To request a hearing, you must send a written response to TDI within 20 days of the date this Notice was mailed.

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:

Stephanie Andrews, Staff Attorney
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 490-1020 (Fax)
stephanie.andrews@tdi.texas.gov



Jurisdiction

The Commissioner of Insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 4001.002, 4005.101, 4005.102, and 4051.051, TEX. OCC. CODE §§ 53.021–53.023, 28 TEX. ADMIN. CODE § 1.502, and TEX. GOV'T CODE §§ 2001.003(1) and 2001.051–2001.178.

Factual Allegations

License Application

1. On February 7, 2024, Brooklyn Jessica Pope (Pope), individual identification no. 2887688, submitted an application to TDI for a general lines agent license with a property and casualty qualification.
2. On March 5, 2024, the department proposed to deny Pope's application based on her criminal history. Pope appealed that decision and made a written request for hearing.

Criminal History

3. On September 1, 2022, Pope pleaded guilty to the offense of Deadly Conduct, a misdemeanor, in case no. 173033501010 in the 263rd District Court of Harris County, Texas. She was sentenced to two years deferred adjudication probation.
4. On December 12, 2023, Pope pleaded guilty to the offense of Terroristic Threat Impair Public Service/Public Fear Serious Bodily Injury/Influence Government Conduct or Activities, a felony, in cause no. 21-DCR-095541A in the 458th Judicial District Court of Fort Bend County, Texas. She was sentenced to seven years deferred adjudication probation.
5. Pope is currently on deferred adjudication probation until approximately 2030.

Legal Allegations

1. Pope committed acts for which a license may be denied pursuant to TEX. INS. CODE § 4005.101, as contemplated by TEX. INS. CODE § 4005.102.

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Notice of Allegations
Brooklyn Jessica Pope
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2. Pope willfully violated an insurance law of this state, in violation of TEX. INS. CODE § 4005.101(b)(1).
3. Pursuant to TEX. OCC. CODE §§ 53.021 (c)-(d), the commissioner may deny Pope's application and consider her to have been convicted of an offense for which she received deferred adjudication, if after consideration of the factors in TEX. OCC. CODE §§ 53.022 and 53.023(a), the commissioner determines that:
 - a. Pope has not completed her period of supervision; and
 - b. Pope's employment in the business of insurance would give her the opportunity to repeat the prohibited conduct.
4. Pope committed an offense that directly relates to the duties and responsibilities of the licensed occupation, as contemplated by 28 TEX. ADMIN. CODE §§ 1.502(f)(3) and 1.502(f)(4)(F), and TEX. OCC. CODE §§ 53.021-53.023.
5. Pope committed an offense that the department considers to be of such a serious nature that it is of prime importance in determining fitness for licensure, as contemplated by 28 TEX. ADMIN. CODE. §§ 1.502(f)(3) and 1.502(f)(4)(F), and TEX. OCC. CODE §§ 53.021-53.023.
6. Department 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 the department determines that the applicant has committed an offense that directly relates to the duties and responsibilities of the licensed occupation;
 - c. considers any felony involving moral turpitude or breach of fiduciary duty, to be of such serious nature that it is of prime importance when determining fitness for licensure, 28 TEX. ADMIN. CODE § 1.502(f)(3); and
 - d. considers the offense of Terroristic Threat Impair Public Service/Public Fear Serious Bodily Injury/Influence Government Conduct or Activities to be of such a serious nature that it is of prime importance when determining fitness for licensure. 28 TEX. ADMIN. CODE §§ 1.502(f)(3) and 1.502(f)(4)(F).

Relief Sought

TDI seeks the following relief:

1. denial of your license application; and
2. imposition of any other just and appropriate relief to which the department may be entitled to by law, including any combination of the above actions.

Respectfully,



Stephanie Andrews
State Bar No. 24063672
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 676-6346 (Direct)
(512) 490-1020 (Fax)
stephanie.andrews@tdi.texas.gov

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

CERTIFICATE OF SERVICE

I, Stephanie Andrews, certify that a true and correct copy of this *Notice of Allegations Against Brooklyn Jessica Pope* was sent by the following methods on this 19th day of December, 2024 to:

Brooklyn Jessica Pope
[REDACTED]
Missouri City, TX 77489

Via CM/RRR No.: 9214 8901 9403 8392 6039 04
Via First Class Mail

[REDACTED]
Respondent Pro Se

Via Email



Stephanie Andrews

2025-9135



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: 12/19/2024

Shipped From:

Name: MC ENF D MORENO

Address: 1601 CONGRESS AVENUE SUITE 6 900

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

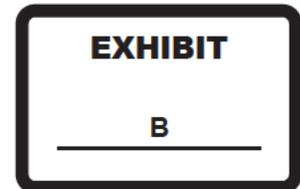
USPS EMPLOYEE: Please scan upon pickup or receipt of mail.
Leave form with customer or in customer's mail receptacle.



USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0057 8350 50



Andrews/34314



Firm Mailing Book For Accountable Mail

Name and Address of Sender
MC ENF D MORENO
TEXAS DEPARTMENT OF INSURANCE
1601 CONGRESS AVENUE, SUITE 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.

USPS Tracking/Article Number

Postage

(Extra Service) Fee

Handling Charge

Actual Value if Registered

Insured Value

Due Sender if COD

ASR Fee

ASRD Fee

RD Fee

RR Fee

SC Fee

SCRD Fee

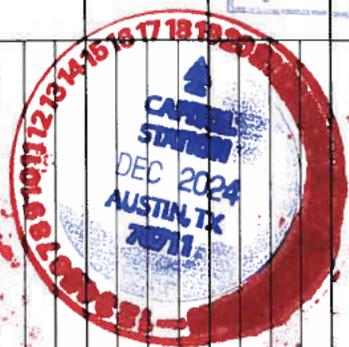
SH Fee

1. 9214 8901 9403 8392 8039 04

Andrews/34314

REC'D BY JESSICA POPE
MISSOURI CITY, TEXAS 77489

RECEIVED
DEC 20 2024
TDI - ENFORCEMENT



2025-9135

Total Number of Pieces Listed by Sender

Total Number of Pieces Received at Post Office

Postmaster: Per (Name of receiving employee)

1

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Complete in Ink

Postage	(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee
0.97	4.85	Handling Charge - if Registered and over \$50,000 in value				Adult Signature Required	Adult Signature Restricted Delivery	Restricted Delivery	Return Receipt	Signature Confirmation	Signature Confirmation Restricted Delivery	Special Handling

Name and address of sender
 Texas Dept of Insurance
 Mail Code ENF
 1601 Congress Avenue, Suite 6.900
 Austin TX 78701
 David Moreno
 December 19, 2024

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
 First-Class Mail

Priority Mail Express
 Registered Mail
 Return Receipt for Merchandise
 Signature Confirmation
 Signature Confirmation Restricted Delivery

USPS Tracking/Article Number
 Andrews/34314

Address (Name, Street, City, State, & Zip Code)
 Brooklynn Jessica Pope
 Missouri City, Texas 77489

Artix Stamp Here
 (if issued as an international certificate of mailing or for additional copies of this receipt). Postmark with Date of Receipt

Postage	(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RO Fee	RR Fee	SC Fee	SCRD Fee	SH Fee
69		due										

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 CORRECTION
 IMI
\$002.00
 12/19/2024 ZIP 78701
 043M3220S395
US POSTAGE

RECEIVED
 DEC 20 2024
 TDI - ENFORCEMENT

CAPITOL STATION
 DEC 20 2024
 AUSTIN, TX

Handling Charge-if Registered	Adult Signature Req	Adult Signature Restricted	Restricted Deliver	Return Receipt	Signature Confirmation	Signature Confirmation Restrict	Special Hand

2025-9135

Total Number of Pieces
 Total Number of Pieces Received at Post Office

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 Completed in Ink

Privacy Note: For more information on USPS privacy policies, visit usps.com/privacy-policy.

Firm Mailing Book For Accountable Mail