

No. **2025-9185**

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

**Date: 03/07/2025**

**Subject Considered:**

PEOPLEPAY LLC  
7373 Peak Dr. Ste 250  
Las Vegas, Nevada 89128-9012

Default Order  
TDI Enforcement File No. 36061

**General Remarks and Official Action Taken:**

This is a default order taken against PEOPLEPAY LLC (Respondent) because it failed to comply with requirements to maintain its third-party administrator (TPA) certificate of authority. Respondent did not respond to a Notice of Allegations mailed by the Texas Department of Insurance. This order revokes Respondent's certificate of authority.

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

**Findings of Fact**

**Failure to Respond to Notice of Allegations**

1. On December 12, 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, 7373 Peak Dr. Ste 250 Las Vegas, Nevada 89128-9012.
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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PEOPLEPAY LLC

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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, 4151.051, 4151.056, 4151.205, 4151.206, 4151.212, 4151.301–4151.309; TEX. GOV'T CODE §§ 2001.051–2001.178, 2001.003(1); and 28 TEX. ADMIN. CODE §§ 7.1601, 7.1603, and 7.1609.
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 and 1.47.
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.

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Commissioner's Order

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## Order

It is ordered that the third-party administrator certificate of authority held by PEOPLEPAY LLC is revoked.

It is also ordered that PEOPLEPAY LLC cease and desist engaging in the business of a third-party administrator in Texas.

Signed by:  
  
FC5D7EDDFFB4F8...

\_\_\_\_\_  
Cassie Brown  
Commissioner of Insurance

Prepared and reviewed by:



\_\_\_\_\_  
Victor Moya III, Staff Attorney  
Enforcement

**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 PEOPLEPAY LLC. I have confirmed that:

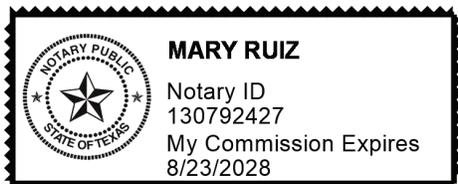
- a. The last mailing address provided to the department in writing by PEOPLEPAY LLC is 7373 Peak Dr. Ste 250 Lase Vegas, Nevada 89128-9012.
- b. The file maintained by Enforcement contains a Notice of Allegations dated December 12, 2024, which was sent to PEOPLEPAY LLC.
- c. On December 12, 2024, the Notice of Allegations addressed to PEOPLEPAY LLC was mailed first-class and certified, return receipt requested, to its last known address.

Copies of the first-class mail log and certified mail log maintained by Enforcement are attached as Exhibit B and Exhibit C, respectively."

Signed by:  
  
 82A13903A8E14D6...  
 Affiant

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 2/12/2025. This notarial act was an online notarization.

**Notary Seal**



**Digital Certificate**

Signed by:  
  
 795DC4D59167489...  
 Notary Public State of Texas

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

December 12, 2024

PEOPLEPAY LLC  
7373 Peak Dr. Ste 250  
Las Vegas, NV 89128-9012

Via CM/RRR No. 9214 8901 9403 8391 3511 03  
Via Email: bodom@mypeoplepay.com  
Via First Class Mail

**TDI ENFORCEMENT CASE NO. 36061  
NOTICE OF ALLEGATIONS AGAINST PEOPLEPAY LLC**

The Texas Department of Insurance (TDI) seeks to take disciplinary action against PEOPLEPAY LLC to revoke its certificate of authority to act as a third party administrator. This Notice states the allegations against PEOPLEPAY LLC and the relief sought by TDI.

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

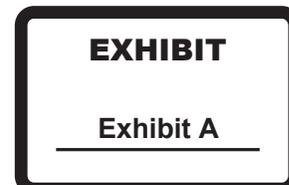
**YOU HAVE THE RIGHT TO A HEARING AND ARE INVITED TO SHOW COMPLIANCE WITH THE LAW.** To request a hearing, you must send a written response to TDI within 20 days of the date this Notice was mailed.

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:

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



## Jurisdiction

The commissioner of insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 4151.051, 4151.056, 4151.205, 4151.206, 4151.212, 4151.301–4151.309; TEX. GOV'T CODE §§ 2001.051–2001.178; 28 TEX. ADMIN. CODE §§ 7.1601, 7.1603, and 7.1609; and TEX. GOV'T CODE § 2001.003(1).

## Factual Allegations

1. On September 28, 2017, TDI issued PEOPLEPAY LLC third party administrator (TPA) certificate of authority no. 2989231.
2. Texas law states that TPA certificates of authority are effective until suspended, canceled, or revoked.
3. TPAs must file annual reports by June 30th of each year covering the preceding calendar year. The report must include an audited financial statement performed by an independent certified public accountant.
4. TPAs must pay a non-refundable \$200 filing fee for each annual report.
5. A TPA is subject to discipline, including revocation of its certificate of authority, if it fails to timely file its annual report.
6. PEOPLEPAY LLC failed to file its annual reports and pay the associated \$200 filing fees for calendar years 2019-2023.

## Legal Allegations

1. PEOPLEPAY LLC failed to timely file annual TPA reports by June 30th on a form prescribed by the commissioner, in violation of TEX. INS. CODE §§ 4151.205 and 4151.301(14), and 28 TEX. ADMIN. CODE § 7.1609.
2. PEOPLEPAY LLC failed to pay the annual \$200 TPA filing fee in violation of TEX. INS. CODE § 4151.206(a)(3) and 28 TEX. ADMIN. CODE § 7.1609(a).
3. PEOPLEPAY LLC has willfully violated an insurance law of this state, as contemplated by TEX. INS. CODE § 4151.301(1).

4. PEOPLEPAY LLC has willfully violated a commissioner rule, as contemplated by TEX. INS. CODE § 4151.301(10).

**Relief Sought**

TDI seeks the following relief:

1. revocation of your TPA certificate of authority;
2. an order mandating you cease and desist from engaging in the acts of a TPA in Texas; and
3. 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,



---

Victor Moya III  
State Bar No. 24104330  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 676-6332 (Direct)  
(512) 490-1020 (Fax)  
Victor.Moya@tdi.texas.gov

cc: Leah Gillum, Deputy Commissioner, Fraud and Enforcement Division, MC: ENF  
Ginger Loeffler, Litigation Director, Enforcement, MC: ENF

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Notice of Allegations

PEOPLEPAY LLC

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**CERTIFICATE OF SERVICE**

I, Victor Moya III, certify that a true and correct copy of this *Notice of Allegations Against PEOPLEPAY LLC* was sent by the following methods on this 12th day of December, 2024 to:

PEOPLEPAY LLC  
7373 Peak Dr Ste 250  
Las Vegas, NV 89128-9012

*Via CM/RRR No.: 9214 8901 9403 8391 3511 03*  
*Via First Class Mail*  
*Via Email: bodom@mypeoplepay.com*

*Victor Moya III*

---

Victor Moya III

**Name and Address of Sender**  
 Texas Dept of Insurance  
 Mail Code ENF  
 1601 Congress Avenue, Suite 6 900  
 Austin TX 78701  
 Mary Ruiz, December 12, 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

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

Firm Mailing Book For Accountable Mail

**EXHIBIT**  
 Exhibit B

USPS Tracking/Article Number	Address (Name, Street, City, State, & Zip Code)	Postage	(Extra Services) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RO Fee	RR Fee	SC Fee
MOYA/36061	PEOPLEPAY LLC 7373 Peak Dr Ste 250 Las Vegas, NV 89128-9012	0.69										

quodient  
 CORRECTION  
 IMI  
**\$002.00**  
 12/12/2024 ZIP 78701  
 043M82206995  
 US POSTAGE

<p><b>RECEIVED</b>          DEC 13 2024  <b>TDI - ENFORCEMENT</b></p> <p>CAPITOL STATION          DEC 13 2024          AUSTIN TX</p>												
<p>Handling Charge-if Registered</p>												
<p>Adult Signature Required</p>												
<p>Adult Signature Restricted Delivery</p>												
<p>Restricted Delivery</p>												
<p>Return Receipt</p>												
<p>Signature Confirmation</p>												
<p>Signature Confirmation Restricted Delivery</p>												
<p>Special Handling</p>												

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Total Number of Pieces Sent by Sender	Total Number of Pieces Received at Post Office	Postmaster: Endurance of account manager	Completed In Mail

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

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: 12/12/2024

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.

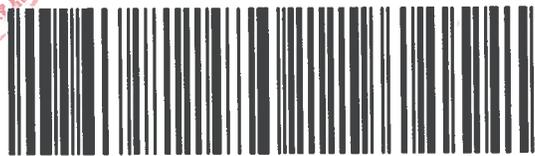
B. USPS Action

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

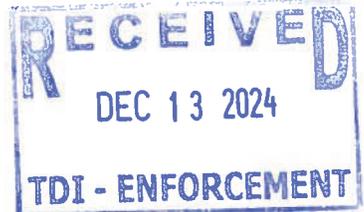


9275 0901 1935 6200 0057 6442 49

moya/36061

EXHIBIT

Exhibit C





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.

USPS Tracking/Article Number

1. 9214 8901 9403 8391 3511 03

moya/36061

Addressee (Name, Street, City, State, & ZIP Code™)

PEOPLEPAY LLC  
7373 PEAK DR. STE 250  
LAS VEGAS, NV 89128-9012

Postage

0.69

(Extra Service) Fee

4.85

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

Adult Signature Required

Adult Signature Restricted Delivery

Restricted Delivery

Return Receipt

Signature Confirmation

Signature Confirmation Restricted Delivery

Special Handling

Handling Charge - if Registered and over \$50,000 in value

RECEIVED  
DEC 13 2024  
TDI - ENFORCEMENT

CAPITOL STATION  
AUSTIN, TX 78711  
DEC 2024  
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27

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Total Number of Pieces Listed by Sender

1

Total Number of Pieces Received at Post Office

Postmark. Per (Name of receiving employee)

PS Form 3877, January 2017 (Page 1 of 1)

Complete in Ink

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PSN 7530-02-000-9098

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