

No. 2025-9431

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

Date: 07/29/2025

Subject Considered:

Texas Department of Insurance

v.

Blanca Guadalupe Reyes

SOAH Docket No. 454-25-05396.C

General Remarks and Official Action Taken:

The subject of this order is Blanca Guadalupe Reyes' application for a general lines license. This order denies Ms. Reyes' application.

Background

After proper notice was given, the above-styled case was heard by an administrative law judge for the State Office of Administrative Hearings. The administrative law judge made and filed a proposal for decision containing a recommendation that Ms. Reyes' application be denied. A copy of the proposal for decision is attached as Exhibit A.

Findings of Fact

The proposed findings of fact contained in Exhibit A are adopted and incorporated by reference into this order.

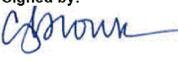
Conclusions of Law

The proposed conclusions of law contained in Exhibit A are adopted and incorporated by reference into this order.

COMMISSIONER'S ORDER
TDI v. Blanca Guadalupe Reyes
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Order

It is ordered that Blanca Guadalupe Reyes' application for a general lines license is denied.

Signed by:

FC5D7EDDFB84F8... _____
Cassie Brown
Commissioner of Insurance

Recommended and reviewed by:

Signed by:

5DAC5618BBC74D4... _____
Jessica Barta, General Counsel

Signed by:

27ADF3DA5BAF4B7... _____
Justin Beam, Chief Clerk

**BEFORE THE
STATE OFFICE OF ADMINISTRATIVE
HEARINGS**

—
**TEXAS DEPARTMENT OF INSURANCE,
PETITIONER**

v.

**BLANCA GUADALUPE REYES,
RESPONDENT**

PROPOSAL FOR DECISION

Blanca Guadalupe Reyes applied to the Texas Department of Insurance (Department) for a general lines license. Department staff (Staff) seeks to deny licensure because (1) Ms. Reyes had a previous license revoked by the Department; and (2) Ms. Reyes intentionally made a material misstatement in her license application. After considering the evidence and the applicable law, the Administrative Law Judge (ALJ) recommends Ms. Reyes's license application be denied.

I. NOTICE, JURISDICTION, AND PROCEDURAL HISTORY

On August 13, 2021, Ms. Reyes applied for a general lines license with the Department,¹ and on October 14, 2021, the Department proposed to deny the application.² Ms. Reyes requested a hearing to challenge the proposed denial of licensure.³ On November 18, 2024, the Department referred this matter to the State Office of Administrative Hearings (SOAH) for a hearing.

On February 19, 2025, SOAH ALJ Megan Johnson convened a hearing by Zoom videoconference. Attorney Jeannie Ricketts represented Staff, and Ms. Reyes represented herself. The record closed on March 20, 2025, with the filing of the admitted exhibits and hearing transcript. Notice and jurisdiction were undisputed and are thus discussed only in the Findings of Fact and Conclusions of Law.

II. APPLICABLE LAW

The Department recognizes that the special nature of the relationship between insurance agents and the public and the complexity and variety of insurance products necessitate that the public trust in and rely on agents. The Texas Insurance Code authorizes the Department to regulate the business of insurance in this state and to take disciplinary action against agents who violate the law or rules related to

¹ Staff Ex. 2 at 35.

² Staff Ex. 2 at 31.

³ Staff Ex. 2 at 40, 44.

insurance.⁴ Relevant to Staff’s allegations,⁵ the Insurance Code authorizes to deny a license application for the following:

- willfully violating an insurance law of this state;⁶
- intentionally making a material misstatement in a license application;⁷
- obtaining, or attempting to obtain, a license by fraud or misrepresentation;⁸
- engaging in fraudulent or dishonest acts or practices;⁹ or
- having a previous license revoked or denied by the Department’s commissioner and failing to show good cause why that revocation or denial should not be considered a bar to the issuance of a new license.¹⁰

Staff has the burden of proving its grounds for denying Ms. Reyes’s application, while Ms. Reyes has the burden to why her previous license revocation

⁴ Tex. Ins. Code §§ 31.002(1), (3), 4005.102.

⁵ Staff Ex. 1 at 9. Staff mentions Ms. Reyes’s criminal history in the allegations relating to the pending license application, including it as a basis for a bar to licensure absent a demonstration of “good cause.” However, none of the legal allegations in Staff’s Original Petition relate to criminal history and licensure despite it under Texas Occupations Code chapter 53 (Chapter 53). Moreover, Staff’s requested relief at the hearing was related to re-licensure after earlier license revocation. Therefore, the ALJ concludes that, if Staff did intend to pursue sanctions under Chapter 53 (which remains unclear), notice of Chapter 53 applicability was deficient and, therefore, this PFD does not discuss or analyze Ms. Reyes’s criminal history separately from its potential implication on the Chapter 4005 grounds cited by Staff.

⁶ Tex. Ins. Code § 4005.101(b)(1).

⁷ Tex. Ins. Code § 4005.101(b)(2).

⁸ Tex. Ins. Code § 4005.101(b)(3).

⁹ Tex. Ins. Code § 4005.101(b)(5).

¹⁰ Tex. Ins. Code § 4005.105(b), (c).

should not be considered a bar to the current license.¹¹ The standard of proof is by a preponderance of the evidence.¹²

III. EVIDENCE

Staff offered five exhibits, which were admitted, and presented testimony from Lewis Wright, the administrative review liaison for the Department.¹³ Ms. Reyes testified on her own behalf and did not offer any exhibits.

A. MS. REYES'S LICENSING HISTORY WITH THE DEPARTMENT

In 1997, the Department issued Ms. Reyes a trainee license, which converted to a general lines agent license with a property and casualty qualification in 1998.¹⁴ In her application, Ms. Reyes represented that she did not have any criminal history, despite having pleaded guilty to and been convicted of two felony offenses.¹⁵ In 1999, Ms. Reyes submitted a renewal application, stating again that she did not have any criminal history.¹⁶

¹¹ 1 Tex. Admin. Code § 155.427.

¹² *Granek v. Tex. State Bd. of Med. Exam'rs*, 172 S.W.3d 761, 777 (Tex. App.—Austin 2005, no pet.).

¹³ Staff Exs. 1, 2, 3, 5, 6. Staff Exhibits 2 and 6 are marked as confidential. The ALJ took official notice of Staff's Exhibit 4 (statutes and rules relevant to this case).

¹⁴ Staff Ex. 6 at 223.

¹⁵ Staff Ex. 2 at 135-40. In 1992, Ms. Reyes pleaded guilty to and was convicted of the felony offenses of criminal mischief and first-degree burglary of a residence in Cause Nos. 0-639457-01010 and 0-639458-01010 in the 351st District Court of Harris County, Texas. The offenses took place in 1992. The court sentenced her concurrently to five years' deferred adjudication for each count, from which she was released in June 1995. She was also ordered to pay restitution of \$3,683. *See* Staff Ex. 3 at 146-60; Staff Ex. 5 at 202-18. Ms. Reyes was 25 years old when she committed these offenses.

¹⁶ Staff Ex. 2 at 142-43.

On May 24, 2004, the Department commissioner entered, by default, Official Order No. 04-0527, revoking Ms. Reyes's general lines agent license (Revocation Order).¹⁷ The Department revoked the license based on findings by the Department that Ms. Reyes engaged in fraudulent and dishonest practices, made material misstatements in the applications to the Department, and provided fraudulent documents to a government office as it relates to providing proof of insurance for individuals.¹⁸

In 2005, the Department issued Ms. Reyes a limited lines agent license after she applied for the license using the alias Guadalupe Blanca Cardenas.¹⁹ Ms. Reyes failed to disclose her criminal history or the Revocation Order on her application.²⁰ Ms. Reyes failed to renew her license in 2009.²¹

In 2015, Ms. Reyes applied for a general lines property and casualty license, using the alias Blanca Guadalupe Reyes De Cardenas. Ms. Reyes did not disclose any

¹⁷ Staff Ex. 2 at 106-114.

¹⁸ Staff Ex. 2 at 106-15. The Department provided a notice to Ms. Reyes of its intent to institute disciplinary action. Staff Ex. 2 at 126-32. The Department also provided a notice to Ms. Reyes of a public hearing regarding the disciplinary action. Staff Ex. 2 at 117-24.

¹⁹ Staff Ex. 6 at 221, 225-30. Ms. Reyes used a different social security number in the 2005 application from her 1997 application. Staff Ex. 6 at 225. Mr. Wright testified that the license was granted because the Department did not make the connection between the profile on the application for a limited lines agent license with the previous licensure granted to Ms. Reyes, since Ms. Reyes provided a different name and demographics.

²⁰ On September 5, 2000, Ms. Reyes pleaded guilty to and was convicted of the misdemeanor offense of criminal mischief in Cause No. 88007 in County Court at Law No. 2, Fort Bend County, Texas. Ms. Reyes was sentenced to 18 months of probation. The court ordered Ms. Reyes to pay \$190.25 court costs and a \$250 fine; to complete 80 hours of community service; and to complete an anger management program. Staff Ex. 2 at 89-92. Ms. Reyes was 33 years old at the time of the conviction.

²¹ Staff Ex. 6 at 221.

of her criminal history or the Revocation Order in her application.²² After detecting that Ms. Reyes failed to disclose her criminal history, the Department contacted her for additional information.²³ Ms. Reyes provided a statement to explain her failure to disclose and support her fitness for licensure.²⁴ In 2017, the Department denied Ms. Reyes's license application.²⁵

On August 13, 2021, Ms. Reyes applied for a general lines license, using the alias Blanca Guadalupe Reyes De Cardenas.²⁶ In her application, Ms. Reyes answered "no" to the question that asked whether she has ever been named or involved as a party in an administrative proceeding regarding any professional license.²⁷ On October 14, 2021, the Department proposed to deny Ms. Reyes's license application.²⁸ Ms. Reyes requested a hearing on November 4, 2021.²⁹

²² Staff Ex. 2 at 81-85. Ms. Reyes used the same social security number as in the 2005 application. Staff Ex. 2 at 81. On May 27, 2009, Ms. Reyes was indicted for the felony offense of acting as an insurance agent with a revoked license in Cause No. 1209138, in Harris County District Court No. 178. The offense took place in 2007, and Ms. Reyes was 40 years old. Staff Ex. 2 at 56. On October 16, 2009, Ms. Reyes pleaded guilty to and was sentenced to 18 months' deferred adjudication for the misdemeanor offense of attempted insurance fraud \$1,500-\$20,000 in the 178th District Court of Harris County, Texas, in Cause No. 120938. The offense took place in 2007. Ms. Reyes was ordered to pay a \$40 monthly supervision fee and \$153 in court costs. The court also ordered her to, among other things, complete eight hours of community service per month, submit to drug/alcohol evaluation and education evaluation, and report by mail each month to the Community Supervision Officer. Staff Ex. 2 at 57-70. Ms. Reyes was 39 years old at the time of the offense. In July 2010, the court ended Ms. Reyes's deferred adjudication. Staff Ex. 2 at 55.

²³ Staff Ex. 2 at 86-88.

²⁴ Staff Ex. 2 at 97-98.

²⁵ Staff Ex. 2 at 75; Staff Ex. 6 at 222.

²⁶ Mr. Wright testified that the basic duties of a general lines agent are to represent insurance companies during the sales transaction, to present products to the public, to explain those products, to evaluate the need for a product for consumers, and to effectively place protection and coverage through the application process, transmitting personal information as it relates to a risk, and also mentally facilitating the transaction of an insurance policy.

²⁷ Staff Ex. 2 at 23-29. Ms. Reyes used the same social security number as in the 1997 application. Staff Ex. 2 at 23.

²⁸ Staff Ex. 2 at 35.

²⁹ Staff Ex. 2 at 54.

Ms. Reyes submitted a statement, character letters, and her resume to the Department in relation to her application.³⁰ Ms. Reyes's personal statement relates to the criminal record she disclosed on her application; she explains that she was in a relationship with an abuser who took over her license and business after she "ran away" to New Mexico in 2009.³¹ Ms. Reyes states that she did nothing wrong (it was all her abuser's fault), but the prosecutor charged her anyway. She pleads for the opportunity to start a new life.³² Ms. Reyes's resume shows Ms. Reyes has been consistently employed, mostly in tax preparation and title services, since April 2005.³³ Ms. Reyes provided character letters from a Farmers Insurance agent, her supervisor at a tax company, a friend for whom she provided child- and dog-care services, and her brother.³⁴ The letters describe Ms. Reyes positively as responsible, capable, honest, and friendly, but none mentions Ms. Reyes's criminal history.

B. MR. WRIGHT'S TESTIMONY

Mr. Wright is currently the Administrative Review Liaison to the Department's Enforcement Division. He reviews license applications submitted to the Department that have concerning responses to questions. One such concern would be an identified criminal history for the applicant. Mr. Wright said that the Department's mission is to protect Texas consumers in the insurance industry from possible wrongdoings and misconduct. According to Mr. Wright, a license issued by

³⁰ The record included a blank Probationer's Monthly Report and payment slips as well. Staff Ex. 2 at 40-44.

³¹ Staff Ex. 2 at 32.

³² Staff Ex. 2 at 32.

³³ Staff Ex. 2 at 45-46.

³⁴ Staff Ex. 2 at 30, 33, 99, 100, 101.

the Department indicates to the public that the license holder has been deemed honest, trustworthy, competent, and reliable in dealing with Texas insurance consumers. He added that untrustworthy agents can cause financial damage to individuals and families as well as financial institutions.

Mr. Wright testified that the Department analyzes applicants' criminal history to determine whether the offenses are directly related to the occupation. He stated that the nature and severity of the offenses should be considered in determining crimes of prime importance when making a licensing decision. Moreover, he said that the Department considers both prior disciplinary action that the Department Commissioner had issued and related reports of fraudulent conduct attributable to the applicant. He added that conduct the Department would be concerned about does not get "much more directly related" than Ms. Reyes's conduct.

Mr. Wright stated that Staff evaluated Ms. Reyes's criminal history and the prior disciplinary action against Ms. Reyes, as well as her personal statement, resume, character letters, and rehabilitation efforts. Mr. Wright testified that the Department has concerns about Ms. Reyes committing offenses during her 2005-2009 licensure because the Department determined that documents were fraudulently presented using her credentials, which had caused her to lose her license in the past. Mr. Wright said that Ms. Reyes's resume shows a steady employment before, during, and after her criminal offenses. Moreover, Mr. Wright opined that Ms. Reyes's character letters did not address Ms. Reyes's criminal history or why she would be fit for licensure despite this history. Ultimately, Staff decided that the severity and the nature of the criminal offenses outweighed the supportive

information that Ms. Reyes provided. Citing the same reasons, Mr. Wright opined that Ms. Reyes did not show good cause that her application should be granted despite her earlier disciplinary action. In sum, Mr. Wright believed that it is appropriate to deny Ms. Reyes's application.

C. MS. REYES'S TESTIMONY

Ms. Reyes testified that her 1992 offense was due to an argument with the father of her child. She stated that "one of the attorneys" told her that deferred adjudication "does not really go towards [her] record." Based on that belief and the fact that it happened "more than 30 years ago," Ms. Reyes said that she did not disclose it in her application.

Ms. Reyes testified that in 2009, she fled from Texas to New Mexico because her boyfriend at the time "wanted to kill" her. She filed for a restraining order against him; however, he took over her business and "did something and blamed it" on her. She stated that she was not strong enough to defend herself then. She stated that she took responsibility even though she did not commit the fraud.

Ms. Reyes stated that she has been making wiser choices as to her relationships and people near her. She said that in the past 15 years, she has been improving herself, "healing the wounds of the past," and becoming more professional. She added that she has never "done drugs," has not smoked for more than 15 years, and quit drinking five years ago. She testified that she has not had any trouble with the law in the last 15 years. She stated that she strongly desires to be on a healthy path to positive

self-improvement. Ms. Reyes explained that she had to change her name twice, for immigration purposes and because she had to move.

Ms. Reyes testified that, after receiving a job offer from Farmers Insurance in 2021, her “spirits” were “lifted,” and she decided to apply for the license. Ms. Reyes apologized for any inconvenience she has caused the Department. She stated that she is experienced and mature and that she could use the experiences she learned through the years for the benefit of the community. She believes that she could be an exceptional, loyal, honest, and a faithful employee with Farmers Insurance. She stated that at 57 years old, she wants to live in peace in a nice employment for her “elderly years.” She believes that she deserves a second chance and welcomes an opportunity to prove herself to be a trustworthy person who is worthy of being associated with and not condemned for the bad decisions of her past and the wrong people that she was with.

IV. ANALYSIS

A. FAILURE TO DISCLOSE PREVIOUS LICENSE REVOCATION ON APPLICATION

Staff alleges that Ms. Reyes’s false answer on her license application regarding her past involvement in an administrative proceeding constitutes: (1) a willful violation of an insurance law; (2) an intentional material misrepresentation in a license application; (3) an attempt to obtain a license by fraud or misrepresentation; and (4) fraudulent or dishonest acts or practices under Texas Insurance Code section 4005.101(b).

On her 2021 license application, Ms. Reyes answered “no” to the question asking if she had ever been named or involved as a party in an administrative proceeding regarding any professional or occupational license. Ms. Reyes’s “no” answer was false because in 2004, she was party to a disciplinary action by the Department that resulted in the revocation of her general lines license. Ms. Reyes had no explanation for why she answered “no” to this direct question on her license application.

The ALJ concludes that Staff has met its burden in showing Ms. Reyes’s false answer on her license application regarding her past involvement in an administrative proceeding constitutes an intentional material misrepresentation, an attempt to obtain a license by misrepresentation, and a dishonest practice under Texas Insurance Code section 4005.101(b)(2), (3), and (5). Ms. Reyes’s responses to direct questions in the application are material—the Department makes licensing decisions based on those answers. Moreover, Ms. Reyes’s previous license revocation can be a ground for denial, as discussed below, which also makes its disclosure material to her application and potential licensure. Ms. Reyes’s answer was dishonest, and she attempted to obtain a new license through misrepresentation by submitting the application to the Department with a false answer.

Staff further alleges that each of Respondents’ violations of insurance laws were committed “willfully” and, therefore, are separately sanctionable under Texas Insurance Code section 4005.101(b)(1). The Insurance Code does not define “willfully,” but the Department has previously determined that the term means

“deliberate, voluntary, or intentional.”³⁵ The ALJ finds Ms. Reyes’s violation was “deliberate, voluntary, or intentional;” therefore, they also violated Texas Insurance Code section 4005.101(b)(1).

Accordingly, the ALJ recommends that Ms. Reyes’s application should be denied because she willfully violated an insurance law; intentionally made a material misrepresentation in a license application; attempted to obtain a license by fraud or misrepresentation; and engaged in fraudulent or dishonest acts or practices under Texas Insurance Code section 4005.101(b).

B. PREVIOUS LICENSE REVOCATION AS BAR TO NEW LICENSE

Staff also alleges that the Revocation Order bars issuance of a new license to Ms. Reyes under Texas Insurance Code section 4005.105(b). This statute bars reapplication for licensure before the fifth anniversary of the effective date of the previous denial or revocation. Here, the Revocation Order was effective May 2004, and Ms. Reyes reapplied for licensure in 2021; therefore, the five-year bar is inapplicable.

The Department may still deny Ms. Reyes’s application under section 4005.105(c), however, if Ms. Reyes fails to show good cause why the previous revocation should not be a bar to the new license. The Revocation Order was entered by default; nonetheless, the Department found that Ms. Reyes engaged in fraudulent

³⁵ See *Tex. Dep’t of Ins. v. Everett Wayne Collier*, SOAH Docket No. 454-18-4457.C, Commissioner’s Order No. 20196028 at 3 (July 31, 2019) (citing *Otis Engineering Corp. v. Pennington*, No. 05-91-00002-CV, 1992 WL 172389 at 9 (Tex. App.—Dallas 1992, no writ) (not designated for publication)).

and dishonest practices, made material misstatements in the applications to the Department, and provided fraudulent documents to a government office as it relates to providing proof of insurance for individuals. These are serious findings, implicating honesty, integrity, and trustworthiness. Moreover, the findings included and considered Ms. Reyes's criminal history and failure to disclose it on applications for licensure. She had no explanation as to why she failed to disclose the Revocation Order on her 2021 license application.

In addition, Ms. Reyes's criminal history is extensive and serious. Her convictions, which include multiple felonies and one offense involving insurance fraud, date back to 1992 and continue through 2009. Ms. Reyes provided a personal statement that blamed some of the offenses on her abusive partner and pleaded for a new life. She also provided letters of recommendation that were positive and supportive of Ms. Reyes, though they did not mention her criminal or past licensing history. While the ALJ is empathetic to Ms. Reyes's difficult past, neither her personal situation as explained nor the letters as written can overcome her extensive and serious criminal history.

Ms. Reyes provided no other basis or argument that would show good cause why the prior revocation should not bar her new license. Therefore, the ALJ recommends that the Department deny Ms. Reyes's application under Texas Insurance Code section 4005.105(b) and (c), as Ms. Reyes failed to show good cause why the prior revocation should not bar her from receiving a new license.

V. FINDINGS OF FACT

1. Blanca Guadalupe Reyes applied for a general lines license with the Texas Department of Insurance (Department) on August 13, 2021, and, on October 14, 2021, the Department proposed to deny the application.
2. In 1997, the Department issued Ms. Reyes a trainee license, which converted to a general lines agent license with a property and casualty qualification in 1998. In 1999, Ms. Reyes submitted a renewal application.
3. On May 24, 2004, the Department commissioner entered, by default, Official Order No. 04-0527, revoking Ms. Reyes's general lines agent license (Revocation Order). The Department revoked the license based on findings by the Department that Ms. Reyes engaged in fraudulent and dishonest practices, made material misstatements in the applications to the Department, and provided fraudulent documents to a government office as it relates to providing proof of insurance for individuals.
4. In 2005, the Department issued Ms. Reyes a limited lines agent license after she applied for the license using the alias Guadalupe Blanca Cardenas. Ms. Reyes failed to renew her license in 2009.
5. In 2015, Ms. Reyes applied for a general lines property and casualty license, using the alias Blanca Guadalupe Reyes De Cardenas. In 2017, the Department denied Ms. Reyes's license application.
6. In her 2021 application, Ms. Reyes answered "no" to the question that asked whether she has ever been named or involved as a party in an administrative proceeding regarding any professional license. This answer was false.
7. A license issued by the Department indicates to the public that the license holder has been deemed honest, trustworthy, competent, and reliable in dealing with Texas insurance consumers.
8. Ms. Reyes's false answer on her license application was a material misrepresentation.
9. Ms. Reyes's false answer on her license application was dishonest.

10. Ms. Reyes attempted to obtain a license by misrepresentation.
11. Ms. Reyes willfully violated insurance laws.
12. Ms. Reyes's criminal history is serious and extensive.
13. Ms. Reyes failed to prove good cause as to why the Revocation Order should not bar her new license.
14. Ms. Reyes timely requested a hearing to challenge the proposed denial, and, on November 18, 2024, the Department referred this matter to the State Office of Administrative Hearings (SOAH) for a hearing.
15. On November 21, 2024, staff (Staff) of the Department mailed a Notice of Hearing, which attached the Original Petition, to Ms. Reyes. The Notice of Hearing, together with the Original Petition, contained a statement of the time, place, and nature of the hearing; a statement of the legal authority and jurisdiction under which the hearing was to be held; a reference to the particular sections of the statutes and rules involved; and a short, plain statement of the factual matters asserted or an attachment that incorporated by reference the factual matters asserted in the complaint or petition filed with the state agency.
16. On February 19, 2025, SOAH ALJ Megan Johnson convened a hearing by Zoom videoconference. Attorney Jeannie Ricketts represented Staff, and Ms. Reyes represented herself.
17. The record closed on March 20, 2025, with the filing of the admitted exhibits and hearing transcript.

VI. CONCLUSIONS OF LAW

1. The Department has jurisdiction over the subject matter of this proceeding. Tex. Ins. Code §§ 4001.002, .105, 4005.101-.102.
2. SOAH has jurisdiction over all matters relating to the conduct of the proceeding, including the preparation of a proposal for decision with findings of fact and conclusions of law. Tex. Gov't Code ch. 2003; Tex. Ins. Code § 4005.104.

3. Ms. Reyes received timely and sufficient notice of the hearing. Tex. Gov't Code §§ 2001.051-.052; Tex. Ins. Code § 4005.104(b).
4. Staff had the burden of proof to establish a violation by a preponderance of the evidence. 1 Tex. Admin. Code § 155.427; *Granek v. Tex. St. Bd. of Med. Exam'rs*, 172 S.W.3d 761, 777 (Tex. App. —Austin 2005, no pet.).
5. Ms. Reyes made a material misstatement in her license application in violation of Texas Insurance Code section 4005.101(b)(2).
6. Ms. Reyes attempted to obtain a license by fraud or misrepresentation in violation of Texas Insurance Code section 4005.101(b)(3).
7. Ms. Reyes engaged in fraudulent or dishonest acts or practices in violation of Texas Insurance Code section 4005.101(b)(5).
8. Ms. Reyes's violations were "deliberate, voluntary, or intentional;" therefore, they also violated Texas Insurance Code section 4005.101(b)(1).
9. Ms. Reyes failed to show good cause why the revocation of her previous license should not be considered a bar to the issuance of a new license. Tex. Ins. Code § 4005.105(c).
10. Ms. Reyes's license application should be denied. Tex. Ins. Code §§ 4005.101(b)(1), (2), (3), (5); 4005.105(c).

Signed May 13, 2025.

ALJ Signature:



Megan Johnson

Presiding Administrative Law Judge