

No. 2025-9519

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

Date: 09/16/2025

Subject Considered:

Brenda Cecilia Moreno T.
El Paso, Texas 79928

Default Order
TDI Enforcement File No. 36962

General remarks and official action taken:

The subject of this default order is whether a Funeral Prearrangement Life license should be issued to Brenda Cecilia Moreno T. (Respondent). Respondent did not respond to a Notice of Allegations mailed by the Texas Department of Insurance (TDI). 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 May 29, 2025, TDI sent a Notice of Allegations, attached as Exhibit A, to Respondent.
2. The TDI sent the Notice of Allegations to Respondent's last known address provided in writing to the department, [REDACTED] El Paso, Texas 79928.
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.

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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 of insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 4001.002, 4005.101, 4005.102, and 4054.151; 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. 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, TDI 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.

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Order

It is ordered that Brenda Cecilia Moreno T.'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

Prepared and reviewed by:



Priya Subramanian, Staff Attorney
Enforcement

Affidavit

STATE OF TEXAS §
 §
COUNTY OF TRAVIS §

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

"My name is Mary Ruiz 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 Brenda Cecilia Moreno T. I have confirmed that:

- a. The last mailing address provided to the department in writing by Brenda Cecilia Moreno T is [REDACTED] El Paso, Texas 79928.
- b. The file maintained by Enforcement contains a Notice of Allegations dated May 29, 2025, which was sent to Brenda Cecilia Moreno T.
- c. On May 29, 2025, the Notice of Allegations addressed to Brenda Cecilia Moreno T. was mailed certified, return receipt requested, to her last known address.

Copies of the certified mail log maintained by Enforcement are attached as Exhibit B."

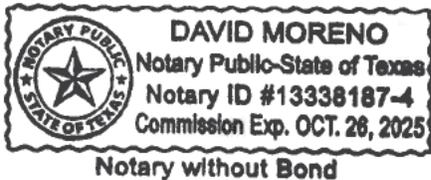
Mary Ruiz
Affiant

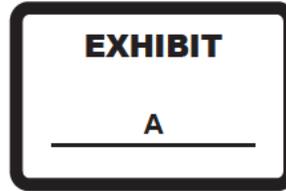
SWORN TO AND SUBSCRIBED before me on August 26, 2025.

(NOTARY SEAL)

David Moreno
Signature of Notary Public

David Moreno
Printed Name of Notary Public





5/29/2025

Brenda Cecilia Moreno T.

[REDACTED]
El Paso, Texas 79928

Via CM/RRR No.9214 8901 9403 8316 2769 79

Via Email: [REDACTED]

TDI ENFORCEMENT CASE NO. 36962
NOTICE OF ALLEGATIONS AGAINST BRENDA CECILIA MORENO T.

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:

Priya Subramanian, Staff Attorney
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 490-1020 (Fax)
priya.subramanian@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 4054.151; 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 December 11, 2024, Brenda Cecilia Moreno T. (Moreno) applied for a Funeral Prearrangement Life license. She failed to disclose her criminal history on her license application.
2. Moreno indicated that she is a U.S. Citizen on her license application, despite not being a U.S. Citizen. At the time of application, Moreno was only authorized to be in the U.S. under a work permit as explained below.
3. On April 8, 2025, TDI proposed to deny Moreno's license application based on her criminal history and failure to disclose.

Criminal History

1. On June 4, 2002, Moreno was arrested for Theft of Property $\geq \$50 < \500 . This charge was dismissed on April 4, 2003.
2. On May 4, 2007, Moreno was charged with Alien Inadmissibility under the Immigration and Nationality Act (INA) § 212.
3. On May 8, 2007, Moreno was subject to Reinstatement of Removal under summary removal procedures pursuant to INA §241(a)(5). Under the terms of her summary removal, she was removed to Mexico for 20 years.
4. On August 14, 2016, Moreno was arrested by U.S. Customs and Border Protection (CBP) at the Sierra Blanca Station in Sierra Blanca, Texas, while attempting to enter the United States in violation of her Reinstatement of Removal.
5. On August 14, 2016, in Case No. 3:16-CR-01567-FM-1 in the United States District Court for the Western District of Texas, El Paso Division, Moreno was charged with

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Felony Illegal Re-Entry (18 U.S.C. § 1326) and Felony Misuse of Passport (18 U.S.C. § 1544).

6. On October 12, 2016, Moreno pleaded guilty to Felony Re-Entry of Deported Aliens charge. Moreno was sentenced to 116 days of confinement on December 7, 2016.
7. On December 7, 2016, the Felony Misuse of Passport charge in Case No. 3:16-CR-01567-FM-1 was dismissed by the United States District Court for the Western District of Texas.

Legal Status

1. In March 2020, Moreno submitted an application to U.S. Citizenship and Immigration Services for U nonimmigrant status (U visa).
2. On October 10, 2024, Moreno received a work permit authorizing her to work in the U.S. The work permit expires on October 8, 2028.

Legal Allegations

1. Moreno committed an act for which a license may be denied, as contemplated by TEX. OCC. CODE §§ 53.021-53.023 and TEX. ADMIN. CODE § 1.502.
2. Moreno intentionally made a material misstatement in a license application, as contemplated by TEX. INS. CODE § 4005.101(b)(2).
3. Moreno attempted to obtain a license by fraud or misrepresentation, as contemplated by TEX. INS. CODE § 4005.101(b)(3).
4. Moreno has been convicted of a felony, as contemplated by TEX. INS. CODE § 4005.101(b)(8).
5. Moreno committed a felony that directly relates to the business of insurance, as contemplated in TEX. OCC. CODE §§ 53.021-53.023 and 28 TEX. ADMIN. CODE § 1.502(d)(1).
6. Moreno has been convicted of an offense for which fraud, dishonesty, or deceit is an essential element as contemplated by 28 TEX. ADMIN CODE § 1.502(f)(1).

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7. Moreno has been convicted of a felony involving moral turpitude or breach of fiduciary duty, as contemplated by 28 TEX. ADMIN. CODE § 1.502(f)(3).
8. The factors referenced in 28 TEX. ADMIN. CODE § 1.502(g), listed in TEX. OCC. CODE §§ 53.022(1)-(5) and 53.023(a)(1)-(7), do not outweigh the serious nature of Moreno's criminal offense, as 28 TEX. ADMIN. CODE § 1.502(f) contemplates.
9. Moreno has been convicted of a criminal felony involving dishonesty or breach of trust, as contemplated by 18 U.S.C. § 1033.

Relief Sought

TDI seeks the following relief:

1. denial of your license application;
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,



Priya Subramanian
State Bar No. 24143443
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 676-6337 (Direct)
(512) 490-1020 (Fax)
priya.subramanian@tdi.texas.gov

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, Priya Subramanian, certify that a true and correct copy of this *Notice of Allegations* was sent by the following methods on this 29th day of May, 2025 to:

Brenda Cecilia Moreno T.



El Paso, Texas 79928

Via CM/RRR No.9214 8901 9403 8316 2769 79

Via Email:



A handwritten signature in black ink, appearing to read 'Priya', with a horizontal line extending to the right.

Priya Subramanian

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EXHIBIT

B

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: 05/29/2025

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:

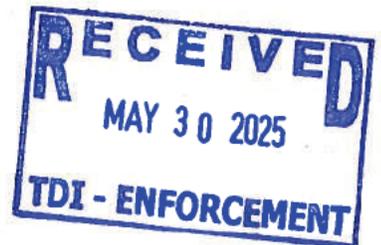
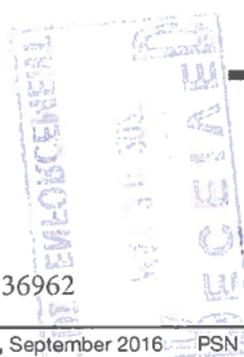
1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm
3. Scan or enter the barcode/label number from PS Form 5630
4. Confirm the volume count message by selecting Yes or No
5. Select Pay and End Visit to complete transaction

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 0061 8082 62

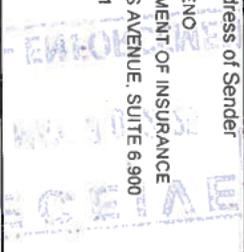


Priya/36962



Firm Mailing Book For Accountable Mail

UNITED STATES
POSTAL SERVICE®
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.

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|---|---|---------------------|-----------------|----------------------------|---------------|----------------------|----------|--------|--------|----------|--------|
| USPS Tracking/Article Number | Postage | (Extra Service) Fee | Handling Charge | Actual Value if Registered | Insured Value | Due to Sender if COD | ASRD Fee | RR Fee | SC Fee | SCRD Fee | SH Fee |
| 1. 9214 8901 9403 8316 2769 79 | 0.97 | 4.85 | | | | | | 2.62 | | | |
| Addresssee (Name, Street, City, State, & ZIP Code™) | BRENDA CECILIA MORENO T. EL PASO, TEXAS 79928 | | | | | | | | | | |

Priya/36962



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| Total Number of Pieces Listed by Sender | Total Number of Pieces Received at Post Office | Postmaster, Per (Name of receiving employee) | | | | | | | | | |
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