

No. **2026-9771**

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

Date: 01/28/2026

Subject Considered:

Title Strategic Partners, LLC
110 E. Houston St., 5th Floor
San Antonio, Texas 78205

Title Strategic Partners, LLC
426 N. Texas Ave.
Odessa, Texas 79761

Default Order
TDI Enforcement File No. 35025

General remarks and official action taken:

This is a default order taken against Title Strategic Partners, LLC (Respondent) because Respondent has engaged in unauthorized insurance acts and false insurance advertising. 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 December 12, 2025, TDI sent a Notice of Allegations, attached as Exhibit A, to Respondent.
2. TDI sent the Notice of Allegations to Respondent's last known addresses, 110 E. Houston St., 5th Floor, San Antonio, TX 78205, and 426 N. Texas Ave., Odessa, TX 79761.

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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.
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, 101.001 *et seq.*, 541.003, 541.052, 2501.001 *et seq.*, 2651.001; 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 and 1.47.
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.

Order

It is ordered that Title Strategic Partners, LLC cease and desist from:

- a. operating its website advertisement, www.titlestrategicpartners.com; and
- b. engaging in the business of insurance in or from Texas, including, but not limited to, the acts of a title insurance agent, title insurance, or a title insurance company.

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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

Prepared and reviewed by:



Kaycee Crisp, Staff Attorney
Enforcement

Affidavit

STATE OF TEXAS §

§

COUNTY OF TRAVIS §

"Before me, the undersigned authority, personally appeared Jackie Gonzales, who, being by me duly sworn, deposed as follows:

My name is Jackie Gonzales and I am employed by the Texas Department of Insurance (TDI). 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 Title Strategic Partners, LLC. I have confirmed that:

- a. The last known mailing addresses for Title Strategic Partners, LLC are: 110 E. Houston St., 5th Floor, San Antonio, TX 78205; and 426 N. Texas Ave., Odessa, TX 79761.
- b. The file maintained by Enforcement contains a Notice of Allegations dated December 12, 2025, which was sent to Title Strategic Partners, LLC.
- c. On December 12, 2025, the Notice of Allegations addressed to Title Strategic Partners, LLC was mailed first-class and certified, return receipt requested, to its last known addresses: 110 E. Houston St., 5th Floor, San Antonio, TX 78205, and 426 N. Texas Ave., Odessa, TX 79761.

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

Signed by:


2EB2A19F113D457...
 Affiant

SWORN TO AND SUBSCRIBED before me on 1/14/2026, 2026.

(NOTARY SEAL)



Signed by:


455E4109E15D4CD...
 Signature of Notary Public

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

December 12, 2025

Title Strategic Partners, LLC
110 E. Houston St., 5th Floor
San Antonio, TX 78205

Via CM/RRR: 9214 8901 9403 8346 8262 74
Via First Class Mail
Via Email: asktitle@titlestrategicpartners.com

Title Strategic Partners, LLC
426 N. Texas. Ave.
Odessa, TX 79761

Via CM/RRR: 9214 8901 9403 8346 8263 59
Via First Class Mail

**TDI ENFORCEMENT CASE NO. 35025
NOTICE OF ALLEGATIONS AGAINST TITLE STRATEGIC PARTNERS, LLC**

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

YOUR WRITTEN RESPONSE IS REQUIRED WITHIN 20 DAYS

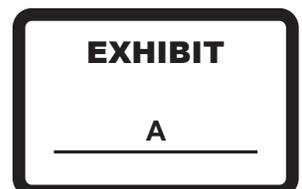
YOU HAVE THE RIGHT TO A HEARING AND ARE INVITED TO SHOW COMPLIANCE WITH THE LAW. To request a hearing, you must send a written response to TDI within 20 days of the date this Notice was mailed.

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:

Kaycee Crisp, Staff Attorney
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030



Austin, Texas 78711-2030
(512) 490-1020 (Fax)
Kaycee.Crisp@tdi.texas.gov

Jurisdiction

The commissioner of insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 101.001 *et seq.*, 541.003, 541.052, 2501.001 *et seq.*, 2651.001; and TEX. GOV'T CODE §§ 2001.003(1) and 2001.051–2001.178.

Factual Allegations

Background

1. Under the Texas Insurance Code, the legislature has expressly stated it is a public policy of this state that Texas not become a safe harbor for persons or insurers engaged in the unauthorized business of insurance in this state, regardless of whether the insureds or other persons affected by the unauthorized business of insurance are residents of this state.

Unauthorized Insurance Advertising

2. In June 2024, an Arizona law firm complained to TDI that images of its employees were being used by an unlicensed Texas title company, Title Strategic Partners, LLC (TSP) on its website - www.titlestrategicpartners.com. The law firm also alleged that TSP agreed to act as the title agent in a transaction involving a non-Texas resident's sale of his Mexican timeshare interest, to an individual located in Mexico.
3. After investigation TDI confirmed the Arizona law firm's allegations and found that TSP's website is operational and viewable by Texas residents.
4. TSP's website advertises that it operates from two addresses in Texas, specifically:
 - a. 110 E. Houston St., 5th Floor, San Antonio, TX 78205, and
 - b. 426 N. Texas. Ave., Odessa, TX 79761.
5. However, neither TSP nor any other business is physically present at either of these locations.

6. TSP's website contains false and misleading representations in the business of title insurance, advertising it:

was founded in January 2011 by Paul W. Wright [*sic*] son Paul H. Wright, Jr. and a staff of five, it has been a *leading title company* in the San Antonio Texas area with qualified, experienced real estate attorneys. [TSP] is able to offer *extensive title-related services* nearby with seamless and timely *closings* for both commercial and real estate transactions. We also provide services relating to *title insurance*, estate planning, condominium conversions, successions, and 1031 Tax-Deferred Exchanges.

(emphasis added).

7. TSP's website includes misleading photographs captioned with false names purporting to be TSP's employees. The faces and people depicted in the photographs actually belong to real attorneys with different names and who work for the Arizona law firm that complained to TDI. These attorneys did not consent or give TSP authorization to use their images.
8. TSP's website also falsely advertises that TSP is "approved to write for four title insurance underwriters."
9. However, according to TDI's records, TSP does not have any insurance license or certificate of authorization to engage in the business of insurance in Texas, and it is not exempt or excepted from holding a title agent license, or any other insurance license or authorization required to engage in the business of insurance in Texas.
10. Furthermore, TSP is not appointed or approved to act as a title agent for any insurance company in or from Texas.
11. TSP's website is a false and misleading advertisement in the business of title insurance.
12. TSP is engaged in unauthorized insurance acts in and/or from Texas.

Legal Allegations

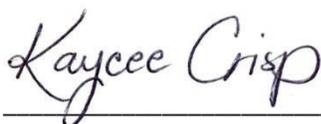
1. TSP has engaged in the acts of a title agent, the business of title insurance, and otherwise engaged in the business of insurance, as those acts are defined in TEX. INS. CODE §§ 101.051, 2501.003, and 2501.005, and in violation of TEX. INS. CODE §§ 101.102 and 2651.001.
2. TSP has violated TEX. INS. CODE §§ 541.003 and 541.052 by advertising and placing false information before the public, specifically holding themselves out as a title agent and title insurance company.

Relief Sought

TDI seeks the following relief:

1. an order under TEX. INS. CODE § 101.103(a)(1), mandating Title Strategic Partners, LLC cease and desist from:
 - a. operating its website advertisement, www.titlestrategicpartners.com; and
 - b. engaging in the business of insurance in or from Texas, including, but not limited to, the acts of a title insurance agent, title insurance, or a title insurance company; and
2. imposition of any other just and appropriate relief to which the department may be entitled by law, including any combination of the above actions.

Respectfully,



Kaycee Crisp
State Bar No. 24057368
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 676-6329 (Direct)
(512) 490-1020 (Fax)
Kaycee.Crisp@tdi.texas.gov

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cc: Leah Gillum, Deputy Commissioner, Fraud and Enforcement Division, MC: ENF
Rachel Cloyd, Litigation Director, Enforcement, MC: ENF

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CERTIFICATE OF SERVICE

I, Kaycee Crisp, certify that a true and correct copy of this *Notice of Allegations Against Title Strategic Partners, LLC* was sent by the following methods on this 12th day of December 2025, to:

Title Strategic Partners, LLC
110 E. Houston St., 5th Floor
San Antonio, TX 78205

Via CM/RRR:9214 8901 9403 8346 8262 74
Via First Class Mail
Via Email: asktitle@titlestrategicpartners.com

Title Strategic Partners, LLC
426 N. Texas. Ave.
Odessa, TX 79761

Via CM/RRR:9214 8901 9403 8346 8263 59
Via First Class Mail



Kaycee Crisp



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: 12/12/2025

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	2
Total	2

*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 0066 7544 27



Kaycee/35025

EXHIBIT

B



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

USPS Tracking/Article Number

1. 9214 8901 9403 8346 8262 74
 Kaycee/35025

ADDRESSEE (Name, Street, City, State, & ZIP Code™)
 TITLE STRATEGIC PARTNERS, LLC
 110 E. HOUSTON ST., 5TH FLOOR
 SAN ANTONIO, TX 78205

2. 9214 8901 9403 8346 8263 59

ADDRESSEE (Name, Street, City, State, & ZIP Code™)
 TITLE STRATEGIC PARTNERS, LLC
 426 N TEXAS AVE
 ODESSA, TX 79761

Postage	(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due if Sender COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee
1.03	5.30											
		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
									2.82			



Firm Mailing Book For Ascendable Mail

Total Number of Pieces Listed by Sender: 2
 Total Number of Pieces Received at Post Office: 2
 Postmaster, Per (Name of receiving employee): *D. Williams*

PS Form 3877, January 2017 (Page 1 of 7) Complete in Ink
 PSN 7530-02-000-9098 JobId 6426366

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