

No. 2026-9935

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

**Date:** 05/20/2026

**Subject Considered:**

Dylan A. Smith  
McKinney, Texas 75070

Default Order  
TDI Enforcement File No. 37459

**General remarks and official action taken:**

This is a default order taken against Dylan A. Smith (Respondent) because he misappropriated money belonging to an insurer and engaged in dishonest conduct. Respondent did not respond to a Notice of Allegations mailed by the Texas Department of Insurance (TDI). This order directs Respondent to pay restitution in the amount of \$14,203.13 to Lincoln Heritage Life Insurance Company and 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 April 1, 2026, TDI sent a Notice of Allegations, attached as Exhibit A, to Respondent.
2. TDI sent the Notice of Allegations to Respondent's last known address provided in writing to the department, [REDACTED], McKinney, TX 75070. TDI also sent the Notice of Allegations to Respondent's electronic mail address he last designated for receipt of official department communications.
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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Commissioner's Order

Dylan A. Smith

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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, 4001.002, 4001.102, 4001.105, 4005.101-4005.105, 4054.051; 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 §§ 1.1302, 1.28, 1.47, and 19.906.
4. Based on Respondent's failure to send TDI 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. 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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Commissioner's Order

Dylan A. Smith

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## Order

It is ordered that any licenses held by Dylan A. Smith are revoked. A copy of this order will be provided to law enforcement or other appropriate administrative agencies for further investigation as may be warranted.

It is further ordered that Dylan A. Smith pay restitution to Lincoln Heritage Life Insurance Company in the amount \$14,203.13. Proof of payment must be sent electronically to TDI at [EnforcementReports@tdi.texas.gov](mailto:EnforcementReports@tdi.texas.gov) within 30 days of this order's date.

Signed by:

*Amanda Crawford*

FE10434BC41A470...

Amanda Crawford

Commissioner of Insurance

Prepared and reviewed by:

*Nancy Williams*

Nancy Williams, 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. 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 Dylan A. Smith. I have confirmed that:

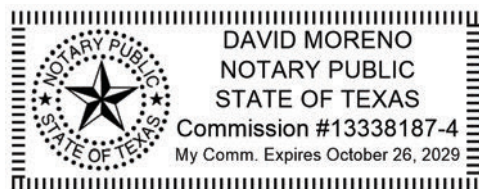
- a. The last mailing address provided to the department in writing by Dylan A. Smith is [REDACTED], McKinney, TX 75070.
- b. The file maintained by Enforcement contains a Notice of Allegations dated April 1, 2026, which was sent to Dylan A. Smith.
- c. On April 1, 2026, the Notice of Allegations addressed to Dylan A. Smith was mailed certified, return receipt requested, to his last known address.

A copy of the certified mail log maintained by Enforcement is attached as Exhibit B."


Signed by:  
  
 \_\_\_\_\_  
 0510A8074C3F44E...  
 Affiant

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 5/4/2026. This notarial act was an online notarization.

**Notary Seal**



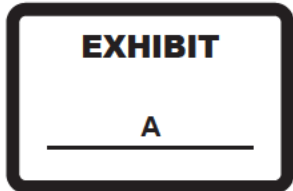
**Digital Certificate**

Signed by:  
  
 \_\_\_\_\_  
 455E4109E15D4CD...  
 Notary Public State of Texas

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



April 1, 2026

Dylan A. Smith



McKinney, TX 75070

Via CM/RRR No. 9214 8901 9403 8364 6041 68

Via Email: [Redacted]

**TDI ENFORCEMENT CASE NO. 37459  
NOTICE OF ALLEGATIONS AGAINST DYLAN A. SMITH**

The Texas Department of Insurance (TDI) seeks to take disciplinary action against you. 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:

Nancy Williams, Staff Attorney  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 490-1020 (Fax)  
nancy.williams@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, 4054.051; and TEX. GOV'T CODE §§ 2001.003(1) and 2001.051–2001.178.

## Factual Allegations

1. Dylan A. Smith (Smith), individual identification number 2901153, holds a general lines agent license with a qualification in life, accident, health, & HMO issued by TDI on March 12, 2024.
2. On May 3, 2024, Smith entered into a contractual agreement with Lincoln Heritage Life Insurance Company (LHLIC), as an appointed life insurance agent.
3. On or about September 10, 2024, Smith's contract with LHLIC was canceled.
4. On September 30, 2024, Smith sent an email to LHLIC admitting, "we both owe your company tremendous money as these funds are NOT ours and we want to arrange a payment plan to give you back every unearned advance as quickly as possible."<sup>1</sup>
5. In a letter to TDI dated July 29, 2025, LHLIC outlined concerns related to Smith's insurance license, indicating that he engaged in a commission scheme, obtaining over \$14,000 in advanced commissions on fictitious or otherwise invalid insurance applications that he submitted to LHLIC.<sup>2</sup>
6. Between May 3 and August 8, 2024, Smith submitted 30 applications for insurance to LHLIC, all of which had the initial premium payment returned. Those policy applications included the following fictitious or otherwise invalid information:
  - a. 25 of the applications contained invalid bank account information;

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<sup>1</sup> Smith uses "we", indicating the other agent who is believed to have been a co-conspirator in the scheme with some commissions being split between the two.

<sup>2</sup> The letter also implicated a second agent who engaged in the scheme with Smith. That agent is not a party to this suit and all allegations of misconduct and restitution indicated in this petition are for Smith alone.

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Dylan A. Smith

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- b. 29 of the applications contained personal identifying information, such as date of birth, address, and contact information that was inconsistent with the applicant;
  - c. 18 of the signatures on the applications were different from the applicant's name, were similar to the agent's writing, or did not match client's other signatures on file;
  - d. some of the electronic signatures on the applications were time stamped within minutes of each other.
7. On September 5, 2025, TDI sent a notice of intent to initiate disciplinary action to Smith, requesting a detailed written response to the allegations. Smith did not respond to TDI's request.

## Legal Allegations

1. Smith committed acts for which he may be disciplined, as contemplated under TEX. INS. CODE §§ 82.053 and 4005.102(2)(A).
2. Smith engaged in fraudulent and dishonest practices, as contemplated under TEX. INS. CODE § 4005.101(b)(5).
3. Smith misappropriated, converted to his own use, or otherwise illegally withheld money belonging to an insurer, as contemplated under TEX. INS. CODE § 4005.101(b)(4)(A).

**Relief Sought**

TDI seeks the following relief:

1. revoking Smith's license;
2. directing Smith to pay restitution to Lincoln Heritage Life Insurance Company in the amount of \$14,203.13; and
3. imposing any other just and appropriate relief to which the department may be entitled to by law, including any combination of the above actions.

Respectfully,



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Nancy Williams  
State Bar No. 24058175  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 676-6338 (Direct)  
(512) 490-1020 (Fax)  
nancy.williams@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, Nancy Williams, certify that a true and correct copy of this *Notice of Allegations Against Dylan A. Smith* was sent by the following methods on April 1, 2026 to:

Dylan A. Smith

[REDACTED]

McKinney, TX 75070

Via CM/RRR No.9214 8901 9403 8364 6041 68

Via Email: [REDACTED]



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Nancy Williams



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: 04/01/2026
Shipped From:
Name: MC ENF D MORENO
Address: 1601 CONGRESS AVENUE SUITE 6 900
City: AUSTIN
State: TX ZIP+4® 78701

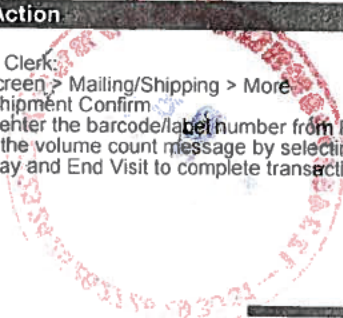
Table with 2 columns: Type of Mail, Volume. Rows include Priority Mail Express®, Priority Mail®, First-Class Package Service®, Returns, International\*, Other (1), and Total (1).

\*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

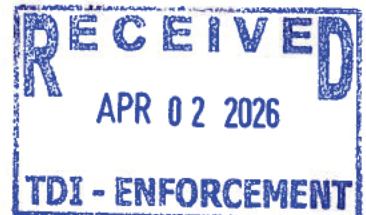
USPS EMPLOYEE: Please scan upon pickup or receipt of mail. Leave form with customer or in customer's mail receptacle.



USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0069 5534 54



Nancy/37459

