

No. 2022-7330

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

Date: 05/26/2022

Subject Considered:

Gregory Nauls

[REDACTED]
Dallas, TX 75251-1394

Default Order
SOAH Docket No. 454-21-2779.C
TDI Enforcement File No. 27090

General remarks and official action taken:

The subject of this default order is whether a general lines agent license with a qualification in life, accident, health, and HMO should be issued to Gregory Nauls (Respondent). Respondent did not appear at the hearing on the merits. This order denies Respondent's license application.

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

Findings of Fact

Failure to Appear at Hearing on the Merits

1. On June 30, 2021, the Texas Department of Insurance filed a Notice of Hearing, attached as Exhibit A, and an Original Petition, attached as Exhibit B, with the State Office of Administrative Hearings.
2. On March 28, 2022, the Texas Department of Insurance filed an Amended Notice of Hearing, attached as Exhibit C, and an Amended Petition, attached as Exhibit D, with the State Office of Administrative Hearings.

2022-7330

Commissioner's Order

Gregory Nauls

SOAH Docket No. 454-21-2779.C

Page 2 of 5

3. The department's factual allegations set out in the attached Amended Notice of Hearing and Amended Petition are incorporated in this order as findings of fact.
4. The department sent the Notice of Hearing, Amended Notice of Hearing, Original Petition, and Amended Petition to Respondent's last known address provided in writing to the department, [REDACTED] Dallas, TX 75251-1394. The Notice of Hearing, Amended Notice of Hearing, Original Petition, and Amended Petition were also sent by electronic mail.
5. After receiving proper notice of the date, time and location of the hearing on the merits, Respondent failed to appear for the hearing on May 10, 2022, as shown in the record in SOAH Docket No. 454-21-2779.C.

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, and 4054.051; TEX. OCC. CODE §§ 53.021-53.023; 28 TEX. ADMIN. CODE § 1.502; and TEX. GOV'T CODE §§ 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, 1.88, and 1.89.
3. The department provided proper notice of the hearing under TEX. GOV'T CODE §§ 2001.051, 2001.052, and 2001.054, and 28 TEX. ADMIN. CODE §§ 1.28, 1.88, 1.89, and 19.906.
4. Based on Respondent's failure to appear in person or by legal representative at the hearing, the department is entitled to disposition by default under 28 TEX. ADMIN. CODE §§ 1.88 and 1.89.
5. The department's factual and legal allegations set out in the attached Amended Notice of Hearing and Amended Petition are incorporated in this order and deemed admitted as true under 28 TEX. ADMIN. CODE § 1.89.

2022-7330

Commissioner's Order

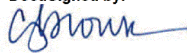
Gregory Nauls

SOAH Docket No. 454-21-2779.C

Page 3 of 5

Order

It is ordered that Gregory Nauls'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.

DocuSigned by:

FC5D7EDDFFBB4F8...

Cassie Brown
Commissioner of Insurance

Prepared and reviewed by:



Nancy Williams, Staff Attorney
Enforcement

2022-7330

Commissioner's Order
Gregory Nauls
SOAH Docket No. 454-21-2779.C
Page 4 of 5

Affidavit

STATE OF TEXAS §

§

COUNTY OF TRAVIS §

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

"My name is David Moreno 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 Gregory Nauls. I have confirmed that:

- a. The last mailing address provided to the department in writing by Gregory Nauls is [REDACTED] Dallas, TX 75251-1394.
- b. The file maintained by Enforcement contains a Notice of Hearing and Original Petition dated June 30, 2021, and an Amended Notice of Hearing and an Amended Petition dated March 28, 2022, which were filed with the State Office of Administrative Hearings.
- c. On June 30, 2021, the Notice of Hearing and Original Petition addressed to Gregory Nauls were mailed certified, return receipt requested, to his last known address.
- d. On March 28, 2022, the Amended Notice of Hearing and Amended Petition addressed to Gregory Nauls were mailed first class and certified, return receipt requested, to his last known address.

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

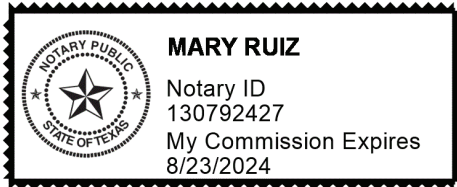
2022-7330

Commissioner's Order
Gregory Nauls
SOAH Docket No. 454-21-2779.C
Page 5 of 5

DocuSigned by:
David Moreno
34C22F48AC524C9...
Affiant

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 5/13/2022. This notarial act was an online notarization.

Notary Seal



Digital Certificate

DocuSigned by:
Mary Ruiz
795DC4D59167489...
Notary Public State of Texas

2022-7330

FILED
454-21-2779
6/30/2021 1:08 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Carol Hale, CLERK

**SOAH DOCKET NO. 454-21-2779
TDI ENFORCEMENT FILE NO. 27090**

ACCEPTED
454-21-2779
06/30/2021 3:31 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Carol Hale, CLERK

TEXAS DEPARTMENT OF INSURANCE,

Petitioner

v.

GREGORY NAULS,

Respondent

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

NOTICE OF HEARING

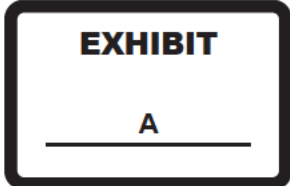
The Texas Department of Insurance seeks to deny your license application. This Notice of Hearing and the Original Petition, which is attached and incorporated for all purposes, states the allegations against you and the relief sought by the Department.

A public hearing will be held before an Administrative Law Judge on **Wednesday, September 29, 2021, at 1:00 p.m.** The hearing will take place via videoconference using a videoconference platform controlled by the State Office of Administrative Hearings, unless otherwise ordered to proceed in another manner by the Administrative Law Judge.

The hearing shall be conducted under TEX. GOV'T CODE, ch. 2001 and 1 TEX. ADMIN. CODE, ch. 155. Unless otherwise directed by the Administrative Law Judge, the hearing shall continue from day to day in the offices of the State Office of Administrative Hearings until concluded. You have the right to appear at this hearing and to be represented by an attorney.

Parties that are not represented by an attorney may obtain information regarding contested case hearings on the public website of the State Office of Administrative Hearings at www.soah.texas.gov, or in printed format upon request to SOAH.

YOU MUST FILE A WRITTEN RESPONSE TO THE NOTICE OF HEARING WITH THE STATE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 20 DAYS OF THE DATE THE NOTICE OF HEARING WAS MAILED. FAILURE TO FILE A WRITTEN RESPONSE BY THIS DEADLINE SHALL ENTITLE TDI TO SEEK DISPOSITION BY DEFAULT UNDER 1 TEX. ADMIN. CODE § 155.501 AND 28 TEX. ADMIN. CODE §§ 1.88 AND 1.89.



2022-7330

Notice of Hearing

Gregory Nauls

SOAH Docket No. 454-21-2779

Page 2 of 5

IF YOU FAIL TO FILE A WRITTEN RESPONSE, THE SCHEDULED HEARING CAN BE CANCELED AND WITHOUT FURTHER NOTICE TO YOU THE COMMISSIONER OF INSURANCE CAN ISSUE AN ORDER IN WHICH THE ALLEGATIONS IN THE NOTICE OF HEARING ARE DEEMED ADMITTED AS TRUE AND THE RELIEF SOUGHT IN THE NOTICE OF HEARING, INCLUDING DENIAL OF YOUR LICENSE APPLICATION, IS GRANTED BY DEFAULT.

IF YOU FILE A WRITTEN RESPONSE BUT THEN FAIL TO APPEAR ON THE DAY AND TIME SET FOR HEARING, WITHOUT FURTHER NOTICE TO YOU, THE COMMISSIONER OF INSURANCE CAN ISSUE AN ORDER IN WHICH THE ALLEGATIONS IN THE NOTICE OF HEARING ARE DEEMED ADMITTED AS TRUE AND THE RELIEF SOUGHT IN THE NOTICE OF HEARING, INCLUDING DENIAL OF YOUR LICENSE APPLICATION, IS GRANTED BY DEFAULT.

In accord with 28 TEX. ADMIN. CODE § 1.90(e) and 1 TEX. ADMIN. CODE §§ 155.101 and 155.103, you should send copies of your written response to:

- (1) Docketing Division
State Office of Administrative Hearings
300 West 15th Street, Room 504
P.O. Box 13025
Austin, Texas 78711-3025
(512) 322-2061 (Fax);
- (2) Chief Clerk
Texas Department of Insurance
P.O. Box 12030, MC GC-CCO
Austin, Texas 78711-2030
(512) 490-1064 (Fax)
chiefclerk@tdi.texas.gov; and
- (3) Alexander Bennett, Staff Attorney
Texas Department of Insurance
Enforcement Division, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 490-1020 (Fax)
Alexander.Bennett@tdi.texas.gov

2022-7330

Notice of Hearing

Gregory Nauls

SOAH Docket No. 454-21-2779

Page 3 of 5

Receiving Documents

The State Office of Administrative Hearings (SOAH) offers you the ability to receive service of orders and other documents issued by SOAH through email instead of by mail or fax. If you want to receive SOAH-issued documents by email, go to SOAH's website, www.soah.texas.gov, click on the "E-Services" tab, then click the hyperlink "Request Service by Email (only for use by self-represented litigants)," and follow the instructions.

NOTE: A request to receive SOAH-issued documents by email does not change the procedures you must follow to file documents with SOAH. The rules for filing documents and providing copies to all other parties in the case are described in SOAH's Procedural Rules, which are available on SOAH's website. Click the "Agency" tab, then click "Administrative Rules and Laws" to view SOAH's Procedural Rules.

Important Security Notice

ALL VISITORS TO THE WILLIAM P. CLEMENTS BUILDING WITHOUT AN AGENCY OR DPS ISSUED ID CARD MUST PROVIDE THE BUILDING SECURITY OFFICER WITH THE STATE OFFICE OF ADMINISTRATIVE HEARINGS DOCKET NUMBER AND RECEIVE A VISITOR'S PASS IN ORDER TO BE ALLOWED ACCESS TO THE HEARING ROOM. INDIVIDUALS SHOULD ALLOW ADDITIONAL TIME TO GO THROUGH THE SECURITY PROCESS.

If you have any questions, please contact me at the address or telephone number shown below.

2022-7330

Notice of Hearing

Gregory Nauls

SOAH Docket No. 454-21-2779

Page 4 of 5

Respectfully Submitted,



Alexander Bennett
State Bar No. 24120713
Texas Department of Insurance
Enforcement Division, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 676-6329 (Direct)
(512) 490-1020 (Fax)
Alexander.Bennett@tdi.texas.gov

ATTORNEY FOR THE PETITIONER
TEXAS DEPARTMENT OF INSURANCE

Enclosure: Original Petition

cc: Leah Gillum, Deputy Commissioner, Enforcement Division, MC-110-1A
Whitney Fraser, Litigation Director, Enforcement Division, MC-110-1A
Administrative Review, MC 107-1A

CERTIFICATE OF SERVICE

I, Alexander Bennett, certify that a true and correct copy of the *Notice of Hearing and the Original Petition* were sent by email and by certified mail, return receipt requested, on this 30th day of June, 2021 to:

Gregory Nauls



Dallas, TX 75251-1394

Respondent Pro Se

Via CM/RRR No.: 9214 8901 9403 8343 7020 69

Via email:



Alexander Bennett

SOAH DOCKET NO. 454-454-21-2779
TDI ENFORCEMENT FILE NO. 27090

TEXAS DEPARTMENT OF INSURANCE,

Petitioner

v.

GREGORY NAULS,

Respondent

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

ORIGINAL PETITION

The Texas Department of Insurance seeks to deny the license application of Gregory Nauls. In support of this petition, the department makes the following allegations upon information and belief:

Jurisdiction

The Commissioner of Insurance has jurisdiction over this matter pursuant to TEX. INS. CODE §§ 82.051-82.055, 4001.002, 4005.101, 4005.102, 4054.051, and 4054.103; TEX. GOV'T CODE §§ 2001.051-2001.178; TEX. OCC. CODE §§ 53.021-53.023; and 28 TEX. ADMIN. CODE § 1.502.

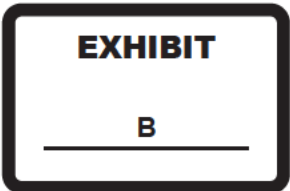
Factual Allegations

License Application

1. Gregory Nauls (Nauls) submitted an application for a general lines agent life, accident, health & HMO license on November 17, 2020.
2. The department proposed to deny Nauls's application on February 26, 2021, based on his criminal history and failure to disclose his criminal history. Nauls timely appealed the decision.

Misrepresentation on License Application

3. In his license application, Nauls falsely answered "No" to the following questions:



Have you ever been convicted of a felony, had a judgement withheld or deferred, or are you currently charged with committing a felony?

Have you ever been convicted of a misdemeanor, had a judgment withheld or deferred, or are you currently charged with committing a misdemeanor?

Criminal History

4. On July 5, 1990, Nauls was convicted of felony theft and was sentenced to six years probation, which was later revoked.
5. On August 27, 1992, Nauls pled guilty to felony theft and was sentenced to six years confinement.
6. On December 6, 1993, Nauls pled guilty to felony theft and was sentenced to seven years confinement.
7. On November 18, 1997, Nauls pled guilty to misdemeanor theft of property and was sentenced to 60 days confinement.
8. On August 21, 1998, Nauls pled guilty to felony robbery and was sentenced to 12 years confinement. Nauls was released on parole on October 7, 2003, and discharged from parole on August 21, 2010.

Legal Allegations

1. Nauls has committed acts for which a license may be denied pursuant to TEX. INS. CODE § 4005.101, as contemplated in TEX. INS. CODE § 4005.102.
2. Nauls intentionally made a material misstatement in a license application, as contemplated by TEX. INS. CODE § 4005.101(b)(2).
3. Nauls attempted to obtain a license by fraud or misrepresentation, as contemplated by TEX. INS. CODE § 4005.101(b)(3).

2022-7330

Original Petition

Gregory Nauls

Page 3 of 4

4. Nauls engaged in fraudulent or dishonest acts or practices, as contemplated by TEX. INS. CODE § 4005.101(b)(5).
5. Nauls is a convicted felon, as contemplated by 28 TEX. ADMIN. CODE §1.502(d) and TEX. INS. CODE § 4005.101(b)(8).
6. Nauls's offense directly relates to the duties and responsibilities of the licensed occupation, as contemplated by TEX. OCC. CODE § 53.021(a)(1).
7. Nauls committed an offense that the department considers to be of such a serious nature that it is of prime importance in determining fitness for licensure, as contemplated by 28 TEX. ADMIN. CODE §§ 1.502(e)(4)(D) and (e)(4)(F).
8. Texas Department of Insurance guidelines, 28 TEX. ADMIN. CODE § 1.502(c)-(e), emphasize the department:
 - a. considers it very important that applicants be honest, trustworthy, and reliable;
 - b. may refuse to issue an original license if the department determines that the applicant has committed a felony or has engaged in fraudulent or dishonest activity that directly relates to the duties and responsibilities of the licensed occupation; and
 - c. considers the offenses of robbery and theft to be of such a serious nature that they are of prime importance when determining fitness for licensure. 28 TEX. ADMIN. CODE § 1.502(e)(4)(D) and (e)(4)(F).

Relief Sought

If one or more of the above allegations is found to be true, the department asks the Administrative Law Judge to enter a Proposal for Decision recommending that the Commissioner of Insurance issue an order:

1. denying Nauls's license application and
2. granting any other just and appropriate relief to which the Department may be entitled to by law.

2022-7330

Original Petition

Gregory Nauls

Page 4 of 4

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Alex Bennett", is positioned above a horizontal line. The signature is written in a cursive style.

Alexander Bennett
State Bar No. 24120713
Texas Department of Insurance
Enforcement Division, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 676-6329 (Direct)
(512) 490-1020 (Fax)
Alexander.Bennett@tdi.texas.gov

ATTORNEY FOR THE PETITIONER
TEXAS DEPARTMENT OF INSURANCE

2022-7330

FILED
454-21-2779
3/28/2022 1:45 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Jessie Harbin, CLERK

ACCEPTED
454-21-2779
3/28/2022 2:03 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Jessie Harbin, CLERK

**SOAH DOCKET NO. 454-21-2779.C
TDI ENFORCEMENT FILE NO. 27090**

TEXAS DEPARTMENT OF INSURANCE,

BEFORE THE STATE OFFICE

Petitioner

v.

OF

GREGORY NAULS,

ADMINISTRATIVE HEARINGS

Respondent

AMENDED NOTICE OF HEARING

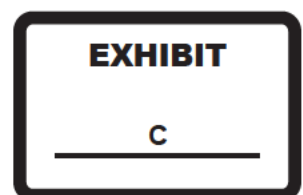
The Texas Department of Insurance seeks to deny your license application. This Amended Notice of Hearing and the Amended Petition, which is attached and incorporated for all purposes, states the allegations against you and the relief sought by the Department.

A public hearing will be held before an Administrative Law Judge on **Tuesday, May 10, 2022, at 9:00 a.m.** The hearing will take place via videoconference using a videoconference platform controlled by the State Office of Administrative Hearings, unless otherwise ordered to proceed in another manner by the Administrative Law Judge.

The hearing shall be conducted under TEX. GOV'T CODE, ch. 2001 and 1 TEX. ADMIN. CODE, ch. 155. Unless otherwise directed by the Administrative Law Judge, the hearing shall continue from day to day in the offices of the State Office of Administrative Hearings until concluded. You have the right to appear at this hearing and to be represented by an attorney.

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2022-7330

Amended Notice of Hearing

Gregory Nauls

SOAH Docket No. 454-21-2779.C

Page 2 of 4

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In accord with 28 TEX. ADMIN. CODE § 1.90(e) and 1 TEX. ADMIN. CODE §§ 155.101 and 155.103, you should send copies of your written response to:

- (1) *(by mail, fax, or electronically)*
Docketing Division
State Office of Administrative Hearings
300 West 15th Street, Room 504
P.O. Box 13025
Austin, Texas 78711-3025
(512) 322-2061 (Fax);
www.soah.texas.gov/e-filing-soah
- (2) *(by mail, fax, or email)*
Chief Clerk
Texas Department of Insurance
P.O. Box 12030, MC GC-CCO
Austin, Texas 78711-2030
(512) 490-1064 (Fax)
chiefclerk@tdi.texas.gov; and
- (3) *(by mail, fax, or email)*
Nancy Williams, Staff Attorney
Texas Department of Insurance
Enforcement Division, MC ENF

2022-7330

Amended Notice of Hearing
Gregory Nauls
SOAH Docket No. 454-21-2779.C
Page 3 of 4

P.O. Box 12030
Austin, Texas 78711-2030
(512) 490-1020 (Fax)
Nancy.Williams@tdi.texas.gov

Receiving Documents Electronically and Filing Documents with SOAH

The State Office of Administrative Hearings (SOAH) offers you the ability to electronically receive orders and other documents issued by SOAH by email instead of by mail. If you want to receive SOAH-issued documents by email, follow the instructions on SOAH's website: www.soah.texas.gov.

A request to receive SOAH-issued documents by email does not change the procedures you must follow to file documents with SOAH. You may file documents with SOAH by mail, fax, or electronically. To file electronically, you must use eFileTexas. Instructions on using eFileTexas are on SOAH's website. SOAH's website also includes guidance for representing yourself.

Important Security Notice (for In-Person Hearings ONLY)

ALL VISITORS TO THE WILLIAM P. CLEMENTS BUILDING WITHOUT AN AGENCY OR DPS ISSUED ID CARD MUST PROVIDE THE BUILDING SECURITY OFFICER WITH THE STATE OFFICE OF ADMINISTRATIVE HEARINGS DOCKET NUMBER AND RECEIVE A VISITOR'S PASS IN ORDER TO BE ALLOWED ACCESS TO THE HEARING ROOM. INDIVIDUALS SHOULD ALLOW ADDITIONAL TIME TO GO THROUGH THE SECURITY PROCESS.

If you have any questions, please contact me at the address or telephone number shown below.

Respectfully Submitted,



Nancy Williams
State Bar No. 24058175
Texas Department of Insurance
Enforcement Division, MC ENF

2022-7330

Amended Notice of Hearing
Gregory Nauls
SOAH Docket No. 454-21-2779.C
Page 4 of 4

P.O. Box 12030
Austin, Texas 78711-2030
(512) 676-6338 (Direct)
(512) 490-1020 (Fax)
Nancy.Williams@tdi.texas.gov

ATTORNEY FOR THE PETITIONER
TEXAS DEPARTMENT OF INSURANCE

Enclosure: Amended Petition

cc: Leah Gillum, Deputy Commissioner, Enforcement Division, MC ENF
Whitney Fraser, Litigation Director, Enforcement Division, MC ENF
Administrative Review, MC CO-AAL

CERTIFICATE OF SERVICE

I, Nancy Williams, certify that a true and correct copy of the *Amended Notice of Hearing and the Amended Petition* were sent as indicated below, on this 28th day of March 2022 to:

Gregory Nauls

[REDACTED]
Dallas, TX 75251-1394
Respondent Pro Se

Via First Class Mail

Via CMRRR No.

9214 8901 9403 8371 0567 45

Via Email [REDACTED]



Nancy Williams

2022-7330

FILED
454-21-2779
3/28/2022 1:45 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Jessie Harbin, CLERK

ACCEPTED
454-21-2779
3/28/2022 2:03 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Jessie Harbin, CLERK

SOAH DOCKET NO. 454-21-2779.C
TDI ENFORCEMENT FILE NO. 27090

TEXAS DEPARTMENT OF INSURANCE,

BEFORE THE STATE OFFICE

Petitioner

v.

OF

GREGORY NAULS,

ADMINISTRATIVE HEARINGS

Respondent

AMENDED PETITION

The Texas Department of Insurance is seeking to deny Gregory Nauls’s license application. The department previously filed an Original Petition and is now amending those allegations. In support of this amended petition, the department makes the following allegations upon information and belief:

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 4054.103; TEX. GOV’T CODE §§ 2001.051-2001.178; TEX. OCC. CODE §§ 53.021-53.023; and 28 TEX. ADMIN. CODE § 1.502.

Factual Allegations

License Application

1. On November 3, 2020, Gregory Nauls (Nauls) applied for a temporary general lines life, accident, health agent license.
2. In his license application, Nauls falsely answered “No” to the following questions:

Have you ever been convicted of a misdemeanor, had a judgment withheld or deferred, or are you currently charged with committing a misdemeanor?

EXHIBIT

D

2022-7330

Amended Petition

Gregory Nauls

Page 2 of 5

Have you ever been convicted of a felony, had a judgement withheld or deferred, or are you currently charged with committing a felony?

3. On his November 3, 2020 application, Nauls falsely indicated that he was exempt from the requirement to provide fingerprints claiming that had already submitted fingerprints to TDI with another license application. When asked for the TDI license number, Nauls responded, "EXEMPT".
4. On November 17, 2020, a temporary license was issued to Nauls based on the false information he presented in his application.
5. On November 17, 2020, Nauls applied for a general lines agent license with a qualification in life, accident, health, and HMO.
6. On December 15, 2020, TDI sent a deficiency letter to Nauls indicating that he was required to submit fingerprints for his application to be deemed complete. On January 7, 2021, TDI received Nauls's fingerprint submission.
7. On January 13, 2021, TDI sent Nauls notice of the fingerprint analysis results and requested additional information. On February 3, 2021, following Nauls's submission of one misdemeanor and one felony record, TDI again requested information on all offenses. Nauls responded, "there were three other notations on my record, however they were misdemeanor charges..."
8. On February 26, 2021, the department proposed to deny Nauls's application for a general lines life, accident, health, and HMO agent license, based on his criminal history and failure to disclose his criminal history.
9. On November 29, 2021, Nauls's temporary license was canceled.

Criminal History

10. On February 12, 1991, Nauls was convicted of felony theft in cause number 584984, in the 176th District Court of Harris County, TX and was sentenced to six years' probation. On August 27, 1992, Nauls's probation was revoked for failing to report and he was sentenced to confinement for six years in the Texas Department of Corrections (TDC).

2022-7330

Amended Petition

Gregory Nauls

Page 3 of 5

11. On December 6, 1993, Nauls was convicted of felony theft in cause number 681380, in the 351st District Court of Harris County, TX and was sentenced to confinement for seven years in the TDC. In the plea agreement, the State agreed not to file any more cases that occurred prior to December 3, 1993.
12. On November 18, 1997, Nauls was convicted of misdemeanor theft in cause number 9747606, in County Court at Law number 10 of Harris County, TX and was sentenced to serve 60 days confinement in county jail.
13. On August 24, 1998, Nauls was convicted of robbery, a felony offense, in cause number 790964, in the 180th District Court of Harris County, TX and was sentenced to twelve years confinement in TDC. Nauls was paroled on October 7, 2003. On August 21, 2010, Nauls was discharged from parole.

Legal Allegations

1. Nauls has committed acts for which a license may be denied pursuant to TEX. INS. CODE § 4005.101, as contemplated in TEX. INS. CODE § 4005.102.
2. Nauls intentionally made a material misstatement in a license application, as contemplated by TEX. INS. CODE § 4005.101(b)(2).
3. Nauls obtained a license by fraud or misrepresentation, as contemplated by TEX. INS. CODE § 4005.101(b)(3).
4. Nauls engaged in fraudulent or dishonest acts or practices, as contemplated by TEX. INS. CODE § 4005.101(b)(5).
5. Nauls is a convicted felon, as contemplated by 28 TEX. ADMIN. CODE §1.502(d) and TEX. INS. CODE § 4005.101(b)(8).
6. Nauls's offenses directly relate to the duties and responsibilities of the licensed occupation, as contemplated by TEX. OCC. CODE § 53.021(a)(1).
7. Nauls committed offenses that the department considers to be of such a serious nature that they are of prime importance in determining fitness for licensure, as contemplated by 28 TEX. ADMIN. CODE §§ 1.502(e)(4)(D) and (e)(4)(F).

8. Texas Department of Insurance guidelines, 28 TEX. ADMIN. CODE § 1.502(c)-(e), emphasize the department:
 - a. considers it very important that applicants be honest, trustworthy, and reliable;
 - b. may refuse to issue an original license if the department determines that the applicant has committed a felony or has engaged in fraudulent or dishonest activity that directly relates to the duties and responsibilities of the licensed occupation; and
 - c. considers the offenses of robbery and theft to be offenses of such a serious nature that they are of prime importance when determining fitness for licensure. 28 TEX. ADMIN. CODE § 1.502(e)(4)(D) and (e)(4)(F).

Relief

If one or more of the above allegations is found to be true, the department asks the Administrative Law Judge to enter a Proposal for Decision recommending that the Commissioner of Insurance issue an order:

1. denying Nauls's license application and
2. granting any other just and appropriate relief to which the Department may be entitled to by law.

Respectfully Submitted,



Nancy Williams
State Bar No. 24058175
Texas Department of Insurance
Enforcement Division, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 676-6338 (Direct)
(512) 490-1020 (Fax)
Nancy.Williams@tdi.texas.gov

2022-7330

Amended Petition

Gregory Nauls

Page 5 of 5

ATTORNEY FOR THE PETITIONER
TEXAS DEPARTMENT OF INSURANCE

2022-7330

Name and Address of sender
 Texas Dept of Insurance
 Mail Code 110-1A
 333 Guadalupe St
 Austin TX 78701
Mary Ruiz
 March 28, 2022

Check type of mail or service
 Adult Signature Required Priority Mail Express
 Adult Signature Restricted Restricted Mail
 Certified Mail Return Receipt for Merchandise
 Certified Mail Restricted Signature Confirmation
 Collect on Delivery (COD) Signature Confirmation Restricted Delivery
 Insured Mail Insured Mail
 Priority Mail

Postage (Extra Service) Fee
 (if issued as an international certificate of mailing or for additional copies of this receipt), Postmark with Date of Receipt

Address (Name, Street, City, State, & Zip Code)
GREGORY NAULS
 DALLAS, TX 75251-1394

RECEIVED
 MAR 29 2022
 TDI - ENFORCEMENT



Handling Charge

\$50,000 in value

OFFICIAL BUSINESS
 STATE OF TEXAS
 PENALTY FOR PRIVATE USE

neopost
 03/28/2022
 US POSTAGE \$001.659
 ZIP 78701
 04-111-2252-595

- Adult Signature Requ.
- Adult Signature Restricted Delive.
- Restricted Delivery
- Return Receipt
- Signatire Confirmation
- Signature Confirmation Restricted Delivery
- Special Handling

Firm Mailing Book For Accountable Mail

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

EXHIBIT
 E

2022-7330



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: 06/30/2021

Shipped From:

Name: MC 110-1A D MORENO

Address: 333 GUADALUPE ST

City: AUSTIN

State: TX ZIP+4® 78701

Type of Mail	Volume
Priority Mail Express®	
Priority Mail®	0
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 0029 9848 85

bennett/27090

EXHIBIT

F



Name and Address of Sender

MC 110-1A D MORENO
TEXAS DEPARTMENT OF INSURANCE
333 GUADALUPE ST
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.

2022-7330

Table with columns: USPS Tracking/Article Number, Postage, (Extra Service) Fee, Handling Charge, Actual Value if Registered, Insured Value, Due Sender if COD, ASR Fee, ASRD Fee, RD Fee, RR Fee, SC Fee, SCRD Fee, SPS Fee. Includes recipient address: GREGORY NALLS, DALLAS, TX.

Total Number of Pieces Listed by Sender: 1

Total Number of Pieces Received at Post Office: 1

Postmaster, Per (Name of receiving employee)



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: 03/28/2022
Shipped From:
Name: MC 110-1A M RUIZ
Address: 333 GUADALUPE ST
City: AUSTIN
State: TX ZIP+4® 78701

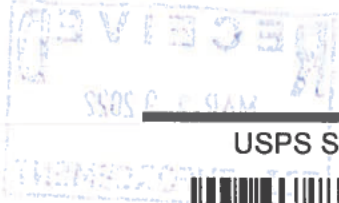
Type of Mail	Volume
Priority Mail Express®	
Priority Mail®	0
First-Class Package Service®	
Returns	
International*	
Other	1
Total	1

*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

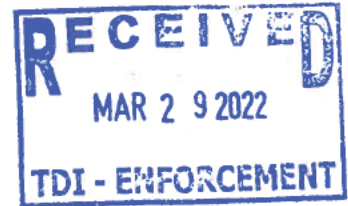
USPS EMPLOYEE: Please scan upon pickup or receipt of mail.
Leave form with customer or in customer's mail receptacle.



USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0035 6792 18



williams/27090



Firm Mailing Book For Accountable Mail

2022-7330

Name and Address of Sender

MC 110-1A M RUIZ
TEXAS DEPARTMENT OF INSURANCE
333 GUADALUPE ST
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 9901 9403 8371 0667 45

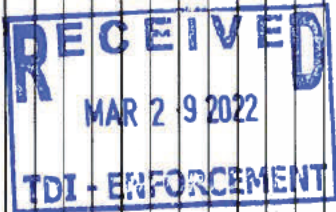
williams/27090

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

GREGORY NALLS
[REDACTED]
DALLAS, TX 75251-1394

Affix Stamp Here
(for additional copies of this receipt).
Postmark with Date of Receipt.

Postage	(Extra Service) Fee	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
0.73	3.75	Handling Charge - if Registered and over \$50,000 in value							1.85			
						Adult Signature Required	Adult Signature Restricted Delivery	Restricted Delivery	Return Receipt	Signature Confirmation	Signature Confirmation Restricted Delivery	Special Handling



Postmaster, Per (Name of receiving employee)

Total Number of Pieces Listed by Sender: 1

Total Number of Pieces Received at Post Office