

No. 2023-8083

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

**Date:** 7/18/2023

**Subject Considered:**

Jeniecia Bethea  
[REDACTED]  
San Antonio, Texas 78251

Default Order  
SOAH Docket No. 454-23-15943.C  
TDI Enforcement File No. 31375

**General remarks and official action taken:**

The subject of this default order is whether a Limited Lines license should be issued to Jeniecia Bethea (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 April 3, 2023, the Texas Department of Insurance (TDI) 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 June 12, 2023, TDI filed an Amended Petition, attached as Exhibit C.
3. TDI's factual allegations set out in the attached Notice of Hearing, Original Petition, and Amended Petition are incorporated in this order as findings of fact.

# 2023-8083

Commissioner's Order

Jeniecia Bethea

SOAH Docket No. 454-23-15943.C

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4. TDI sent the Notice of Hearing, the Original Petition, and the Amended Petition, to Respondent's last known address provided in writing to TDI, [REDACTED], San Antonio, Texas 78251. The 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 June 29, 2023, as shown in the record in SOAH Docket No. 454-23-15943.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 4051.101; 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. TDI 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, TDI is entitled to disposition by default under 28 TEX. ADMIN. CODE §§ 1.88 and 1.89.
5. TDI's factual and legal allegations set out in the attached Notice of Hearing and Original Petition are incorporated in this order and deemed admitted as true under 28 TEX. ADMIN. CODE § 1.89.

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Commissioner's Order

Jeniecia Bethea

SOAH Docket No. 454-23-15943.C

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## Order


It is ordered that Jeniecia Bethea'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...

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Cassie Brown  
Commissioner of Insurance

Prepared and reviewed by:



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Jeannie Ricketts, Staff Attorney  
Enforcement

**Affidavit**

**STATE OF TEXAS** §

§

**COUNTY OF TRAVIS** §

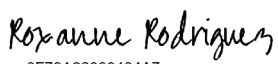
Before me, the undersigned authority, personally appeared Roxanne Rodriguez, who, being by me duly sworn, deposed as follows:

"My name is Roxanne Rodriguez Name 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 Jeniecia Bethea. I have confirmed that:

- a. The last mailing address provided to TDI in writing by Jeniecia Bethea is [REDACTED], San Antonio, Texas 78251.
- b. The file maintained by Enforcement contains a Notice of Hearing and Original Petition dated April 3, 2023, which were filed with the State Office of Administrative Hearings.
- c. On April 3, 2023, the Notice of Hearing and Original Petition, and on June 12, 2023, the Amended Petition, addressed to Jeniecia Bethea, were mailed by first-class and certified, return receipt requested, to her last known address and email address.

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

DocuSigned by:  
  
 OF79A22000484A7...  
 Affiant

# 2023-8083

Commissioner's Order

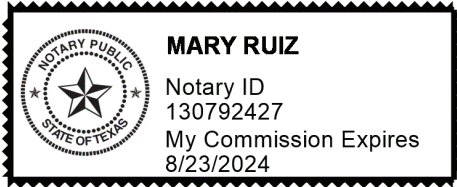
Jeniecia Bethea

SOAH Docket No. 454-23-15943.C

Page 5 of 5

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 6/30/2023. This notarial act was an online notarization.

## Notary Seal



## Digital Certificate

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

**2023-8083**

FILED  
454-23-15943  
4/3/2023 9:51 AM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Pegah Nasrollahzadeh, CLERK

**SOAH DOCKET NO. 454-23-15943.C**  
**TDI ENFORCEMENT FILE NO. 31375**

ACCEPTED  
454-23-15943  
4/3/2023 11:13:29 am  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Pegah Nasrollahzadeh, CLERK

**TEXAS DEPARTMENT OF INSURANCE,**

**BEFORE THE STATE OFFICE**

**Petitioner**

**v.**

**OF**

**JENIECIA BETHEA,**

**ADMINISTRATIVE HEARINGS**

**Respondent**

**NOTICE OF HEARING**

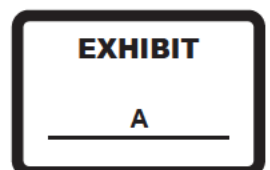
The Texas Department of Insurance seeks to deny your license application. This Notice of Hearing and the Original Petition, which is attached and incorporated for all purposes, states the allegations against you and the relief sought by the Department.

A public hearing will be held before an Administrative Law Judge on **Thursday, June 29, 2023, 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.

**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](http://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.**



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Notice of Hearing

Jeniecia Bethea

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**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) *(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](http://www.soah.texas.gov)
  
- (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](mailto:chiefclerk@tdi.texas.gov); and
  
- (3) *(by mail, fax, or email)*  
Jeannie Ricketts, Staff Attorney  
Texas Department of Insurance  
Enforcement, MC ENF

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Notice of Hearing

Jeniecia Bethea

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P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 490-1020 (Fax)  
jeannie.ricketts@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](http://www.soah.texas.gov).

A request to receive SOAH-issued documents by email does not change the procedures you must follow to file documents or exhibits with SOAH. Instructions on how to file documents and exhibits 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.**



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Notice of Hearing

Jeniecia Bethea

SOAH Docket No. 454-23-15943.C

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

Respectfully Submitted,

*/s/ Jeannie Ricketts*

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Jeannie Ricketts  
State Bar No. 24041774  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 676-6336 (Direct)  
(512) 490-1020 (Fax)  
Jeannie.Ricketts@tdi.texas.gov

ATTORNEY FOR THE PETITIONER  
TEXAS DEPARTMENT OF INSURANCE

Enclosure: Original Petition

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

**2023-8083**

Notice of Hearing

Jeniecia Bethea

SOAH Docket No. 454-23-15943.C

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**CERTIFICATE OF SERVICE**

I, Jeannie Ricketts, certify that a true and correct copy of the *Notice of Hearing and the Original Petition* were sent by regular, first-class mail and by certified mail, return receipt requested, on this 3rd day of April 2023 to:

Jeniecia Bethea

[REDACTED]

San Antonio, TX 78251

*Respondent Pro Se*

*Via CM/RRR No.:*

9214 8901 9403 8309 4724 49

Amtexinsurance.com

[REDACTED]

*Via Email*

*/s/ Jeannie Ricketts*

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Jeannie Ricketts

**2023-8083**

SOAH Docket No. 454-23-15943

ACCEPTED  
454-23-15943  
3/29/2023 4:39:48 pm  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
April Bermea , CLERK

FILED  
454-23-15943  
3/29/2023 4:09 PM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
April Bermea , CLERK

**SOAH DOCKET NO. 454-\_\_\_\_\_**  
**TDI ENFORCEMENT FILE NO. 31375**

**TEXAS DEPARTMENT OF INSURANCE,**

**BEFORE THE STATE OFFICE**

**Petitioner**

**v.**

**OF**

**JENIECIA BETHEA,**

**ADMINISTRATIVE HEARINGS**

**Respondent**

**ORIGINAL PETITION**

The Texas Department of Insurance (TDI) seeks to deny Jeniecia Bethea’s limited lines property and casualty license application. In support of this petition, TDI makes the following allegations upon information and belief:

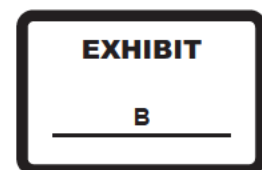
**Jurisdiction**

The Commissioner of Insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051-82.055, 4001.002, 4005.101, 4005.102, 4051.101; 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 October 13, 2022, Jeniecia (aka "Gigi") Bethea (Bethea) (formerly Dorsey) applied for a limited lines license. She did not disclose her recent criminal history.
2. On October 24, 2022, TDI requested that Bethea provide certified copies of her court documents for all her offenses and other information. She did not provide a complete set of her court records.
3. On November 11, 2022, Bethea informed TDI that she did not disclose her criminal history because her employer handled her application.



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Original Petition

Jeniecia Bethea

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4. On December 27, 2022, TDI proposed to deny Bethea's application based on her criminal history. On January 17, 2023, Bethea requested a hearing.

### Criminal History:

#### *Case no. 20140C11410 – Assault Causes Bodily Injury to Family Member*

5. On or about October 28, 2014, in case no. 2014C11410, in El Paso County Court at Law no. 1, the El Paso Police Department filed a complaint and information alleging Bethea assaulted MB causing bodily injury. Bethea waived her arraignment on February 11, 2015.
6. On November 4, 2016, the court dismissed the case after Bethea was convicted and incarcerated in case no. 3:15-CR-01700.

#### *Case no. 3:15-cr-01700 – Conspiracy to Sex Traffic Persons*

7. On September 30, 2015, in case no. 3:15-cr-01700,<sup>1</sup> the United States District Court for the Western District of Texas indicted Bethea and two other co-conspirators, MB and DW, on two felony counts: 1) sex trafficking of children by force, fraud, or coercion under 18 U.S.C. § 1591(a)(1), (a)(2), (b)(2) and (c); and 2) conspiracy to traffic persons under 18 U.S.C. §1594(c).
8. On May 24, 2016, Bethea pleaded guilty to count two.
9. On October 15, 2016, the court convicted Bethea and sentenced her to 40 months imprisonment followed by three years of probation. The court also ordered her to pay a \$100 special assessment and comply with other conditions of release.
10. On November 10, 2016, the court increased Bethea's probation to five years.
11. On August 19, 2019, Bethea began serving her probation.
12. On March 3, 2020, the court transferred jurisdiction of the case from El Paso to the Western District of Texas, San Antonio Division, assigning new case no. 5:20-cr-00149.

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<sup>1</sup> The court sealed the indictment on September 30, 2015, because not all of the defendants named in the indictment had been apprehended. On October 22, 2015, the court unsealed the indictment.

## 2023-8083

Original Petition

Jeniecia Bethea

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### *Case no. 5:20-cr-00149 – Failure to Register as a Sex Offender*

13. On April 14, 2020, Bethea's probation officer notified the court that she violated her supervision. The court allowed her to continue her supervision.
14. On July 22, 2021, in case no. 5:20-cr-00149, the court revoked Bethea's probation after she failed to: 1) report to her probation officer; 2) register as a sex offender; and 3) participate in mental health and sex offender treatment. The court sentenced her to five months imprisonment (consecutive to any other sentence) and two years of probation.
15. On February 16, 2022, Bethea's probation officers filed a Request for Modifying Conditions of Supervision, which stated that during her 19 months of supervised release, "...she did relatively nothing the court directed her to do." The modification added special conditions of probation, which included participating in substance abuse treatment and testing.

### *Case no. 2021-cr-8756 – Failure to Register as a Sex Offender*

16. On September 23, 2021, in case no. 2021-cr-8756, in the 226<sup>th</sup> District Court of Bexar County, Texas, a grand jury indicted Bethea for felony failure to register with local law enforcement authorities within seven days because of a reportable conviction.
17. On January 31, 2022, the court dismissed the charge for further investigation and released Bethea to serve the remainder of her probation in case no. 5:20-cr-00149.
18. Bethea is now listed on the U.S. Department of Justice, Dru Sjodin National Sex Offender Registry Public Website and the Texas Public Sex Offender Website. She remains on supervision.

### **Legal Allegations**

1. Based on Bethea's criminal history, she committed acts for which a license may be denied under TEX. INS. CODE, Chapter 4005, Subchapter C, because she:
  - a. intentionally made a material misstatement in her license application, as contemplated by TEX. INS. CODE § 4005.101(b)(2);

- b. engaged in fraudulent or dishonest acts or practices, as contemplated by TEX. INS. CODE § 4005.101(b)(5); and
  - c. has been convicted of a felony, as contemplated by TEX. INS. CODE § 4005.101(b)(8).
2. Bethea committed offenses that directly relate to the duties and responsibilities of the licensed occupation, as TEX. OCC. CODE § 53.021 and 28 TEX. ADMIN. CODE § 1.502(e)(1) contemplate.
3. TDI guidelines, 28 TEX. ADMIN. CODE § 1.502(c)-(e), emphasize that TDI:
  - a. considers it very important that applicants be honest, trustworthy, and reliable;
  - b. may refuse to issue an original license if TDI determines that the applicant has committed a felony or misdemeanor, or has engaged in fraudulent or dishonest activity that directly relates to the duties and responsibilities of the licensed occupation; and
  - c. considers the fraudulent and dishonest offense of conspiracy to traffic persons to be of such a serious nature that it is of prime importance when determining fitness for licensure, as 28 TEX. ADMIN. CODE § 1.502(e)(1), contemplates.
4. The factors listed in 28 TEX. ADMIN. CODE § 1.502(h) do not outweigh the serious nature of Bethea's criminal offenses, as 28 TEX. ADMIN. CODE § 1.502(f) contemplates.
5. Bethea has been convicted of a criminal felony involving dishonesty or a breach of trust, as contemplated by 18 U.S.C. § 1033.

### **Relief Sought**

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

1. denying Bethea's license application, and
2. granting any other just and appropriate relief to which TDI may be entitled to by law.

**2023-8083**

Original Petition

Jeniecia Bethea

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Respectfully Submitted,

*/s/Jeannie Ricketts*

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Jeannie Ricketts

State Bar No. 24041774

Texas Department of Insurance

Enforcement, MC ENF

P.O. Box 12030

Austin, Texas 78711-2030

(512) 676-6336 (Direct)

(512) 490-1020 (Fax)

Jeannie.Ricketts@tdi.texas.gov

ATTORNEY FOR THE PETITIONER

TEXAS DEPARTMENT OF INSURANCE

**2023-8083**

FILED  
454-23-15943  
6/12/2023 1:46 PM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Pegah Nasrollahzadeh, CLERK

ACCEPTED  
454-23-15943  
6/12/2023 1:53:23 pm  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Pegah Nasrollahzadeh, CLERK

**SOAH DOCKET NO. 454-23-15943.C  
TDI ENFORCEMENT FILE NO. 31375**

**TEXAS DEPARTMENT OF INSURANCE,**

**BEFORE THE STATE OFFICE**

**Petitioner**

**v.**

**OF**

**JENIECIA BETHEA,**

**ADMINISTRATIVE HEARINGS**

**Respondent**

**AMENDED PETITION**

The Texas Department of Insurance (TDI) is seeking to deny Jeniecia Bethea’s license application. TDI previously filed an Original Petition and is now amending those allegations. In support of this amended petition, TDI 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, 4051.101; 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 or about October 13, 2022, Jeniecia (aka “Gigi”) Bethea (Bethea) (formerly Dorsey) applied for limited lines license. She did not disclose her recent criminal history.
2. On or about October 24, 2022, TDI requested that Bethea provide certified copies of her court documents for all her offenses and other information. She did not provide a complete set of her court records.
3. On or about November 14, 2022, Bethea informed TDI that she did not disclose her criminal history because her employer handled her application.

<b>EXHIBIT</b>
<u>    c    </u>



## 2023-8083

Amended Petition

Jeniecia Bethea

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4. On or about December 27, 2022, TDI proposed to deny Bethea's application based on her criminal history. On January 17, 2023, Bethea requested a hearing.

### Criminal History:

#### Case no. 20140C11410 – Assault Causes Bodily Injury to Family Member

5. On or about October 28, 2014, in case no. 2014C11410, in El Paso County Court at Law no. 1, the El Paso Police Department filed a complaint and information alleging Bethea assaulted MB causing bodily injury. Bethea waived her arraignment on or about February 11, 2015.
6. On or about December 17, 2015, the court filed a judgment nisi (ex parte ruling) seeking \$3,000 plus court costs after Bethea failed to appear for her jury trial. On or about November 4, 2016, the court dismissed the case after Bethea was convicted and incarcerated in case no. 3:15-CR-01700.

#### Case no. 3:15-cr-01700 – Conspiracy to Sex Traffic Persons

7. On or about September 30, 2015, in case no. 3:15-cr-01700,<sup>1</sup> the United States District Court for the Western District of Texas indicted Bethea and two other co-conspirators, MB and DW, on two felony counts: 1) sex trafficking of children by force, fraud, or coercion under 18 U.S.C. § 1591(a)(1), (a)(2), (b)(2) and (c); and 2) conspiracy to traffic persons under 18 U.S.C. §1594(c).
8. On or about May 24, 2016, Bethea pleaded guilty to count two.
9. On October 19, 2016, the court convicted Bethea and sentenced her to 48<sup>2</sup> months imprisonment followed by three years probation. The court also ordered her to pay a \$100 special assessment and comply with other conditions of release.
10. On or about November 10, 2016, the court increased Bethea's probation to five years.
11. On or about August 19, 2019, Bethea began serving her probation in San Antonio.

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<sup>1</sup> The court sealed the indictment on September 30, 2015, because not all of the defendants named in the indictment had been apprehended. On October 22, 2015, the court unsealed the indictment.

<sup>2</sup> The court records indicate the government made an oral sentence amendment to 40 months incarceration.

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Amended Petition

Jenecia Bethea

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12. On or about March 6, 2020, the court transferred jurisdiction of the case from El Paso to the Western District of Texas, San Antonio Division, assigning new case no. 5:20-cr-00149.

Case no. 5:20-cr-00149 – Failure to Register as a Sex Offender

13. On or about April 14, 2020, Bethea's probation officer notified the court that she violated her supervision. The court allowed her to continue her supervision.
14. On or about July 22, 2021, in case no. 5:20-cr-00149, the court revoked Bethea's probation after she failed to: (1) report to her probation officer; (2) register as a sex offender; and (3) participate in mental health and sex offender treatment. The court re-sentenced her to five months imprisonment (consecutive to any other sentence) and two years of probation.
15. On or about February 16, 2022, Bethea's probation officer filed a Request for Modifying Conditions of Supervision, which stated that during her 19 months of supervised release, "...she did relatively nothing the court directed her to do." The modification added special conditions of probation, which included participating in substance abuse treatment and testing.
16. On or about September 23, 2021, in case no. 2021-cr-8756, in the 226<sup>th</sup> District Court of Bexar County, Texas, a grand jury indicted Bethea for felony failure to register with local law enforcement authorities within seven days because of a reportable conviction.
17. On or about January 31, 2022, the court dismissed the charge for further investigation and released Bethea to serve the remainder of her probation in case no. 5:20-cr-00149.
18. Bethea is listed on the U.S. Department of Justice, Dru Sjodin National Sex Offender Registry Public Website and the Texas Public Sex Offender Website. She remains on supervision.

### Legal Allegations

1. Based on Bethea's criminal history, she committed acts for which a license may be denied under TEX. INS. CODE, Chapter 4005, Subchapter C, because she intentionally

## 2023-8083

Amended Petition

Jeniecia Bethea

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- made a material misstatement in her license application, as contemplated by TEX. INS. CODE § 4005.101(b)(2).
2. Based on Bethea's criminal history, she committed acts for which a license may be denied under TEX. INS. CODE, Chapter 4005, Subchapter C, because she:
    - a. intentionally made a material misstatement in her license application, as contemplated by TEX. INS. CODE § 4005.101(b)(2);
    - b. engaged in fraudulent or dishonest acts or practices, as contemplated by TEX. INS. CODE § 4005.101(b)(5); and
    - c. has been convicted of a felony, as contemplated by TEX. INS. CODE § 4005.101(b)(8).
  3. Bethea committed offenses that directly relate to the duties and responsibilities of the licensed occupation, as TEX. OCC. CODE § 53.021 and 28 TEX. ADMIN. CODE § 1.502(e)(1) contemplate.
  4. TDI guidelines, 28 TEX. ADMIN. CODE § 1.502(c)-(e), emphasize that TDI:
    - a. considers it very important that applicants be honest, trustworthy, and reliable;
    - b. may refuse to issue an original license if TDI determines that the applicant has committed a felony or misdemeanor, or has engaged in fraudulent or dishonest activity that directly relates to the duties and responsibilities of the licensed occupation; and
    - c. considers the fraudulent and dishonest offense of conspiracy to traffic persons to be of such a serious nature that it is of prime importance when determining fitness for licensure, as 28 TEX. ADMIN. CODE § 1.502(e)(1), contemplates.
  5. The factors listed in 28 TEX. ADMIN. CODE § 1.502(h) do not outweigh the serious nature of Bethea's criminal offense, as 28 TEX. ADMIN. CODE § 1.502(f) contemplates.
  6. Bethea has been convicted of a criminal felony involving dishonesty or a breach of trust, as contemplated by 18 U.S.C. § 1033.

**Relief Sought**

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

1. denying Bethea's license application, and
2. granting any other just and appropriate relief to which TDI may be entitled to by law.

Respectfully Submitted,

*/s/Jeannie Ricketts*

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Jeannie Ricketts  
State Bar No. 24041774  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 676-6336 (Direct)  
(512) 490-1020 (Fax)  
Jeannie.Ricketts@tdi.texas.gov

ATTORNEY FOR THE PETITIONER  
TEXAS DEPARTMENT OF INSURANCE

**CERTIFICATE OF SERVICE**

I, Jeannie Ricketts, certify that a true and correct copy of the *Amended Original Petition* were sent by regular, first-class mail and by certified mail, return receipt requested, on this 12th day of June 2023 to:

Jeniecia Bethea

[REDACTED]

San Antonio, TX 78251

*Respondent Pro Se*

*Via CM/RRR: 9214890194038318727950*

Amtexinsurance.com

[REDACTED]

*Via Email*

*/s/ Jeannie Ricketts*

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Jeannie Ricketts

Firm Mailing Book For Accountable Mail

<p><b>name and address of sender</b>                  Texas Dept of Insurance                  Mail Code ENF                  1601 Congress Avenue, Suite 6.900                  Austin TX 78711                  Mary Ruiz                  April 3, 2023</p>		<p><b>Check type of mail or service</b>  <input type="checkbox"/> Adult Signature Required  <input type="checkbox"/> Adult Signature Restricted Delivery  <input type="checkbox"/> Certified Mail  <input checked="" type="checkbox"/> Certified Mail Restricted Delivery  <input type="checkbox"/> Collect on Delivery (COD)  <input type="checkbox"/> Insured Mail  <input type="checkbox"/> Priority Mail</p>		<p><b>Address (Name, Street, City, State, &amp; Zip Code)</b>                  JENIECIA BETHEA                  [REDACTED]                  SAN ANTONIO, TX 78251</p>		<p><b>USPS Tracking/Article Number</b>                  RICKETTS/31375</p>		<p><b>Postage</b>                  \$8.44</p>		<p><b>Extra Services Fee</b></p>		<p><b>Handling Charge</b>                  9 in value</p>		<p><b>Actual Value if Registered</b></p>		<p><b>Insured Value</b></p>		<p><b>Due Sender if COD</b></p>		<p><b>ASR Fee</b></p>		<p><b>ASRD Fee</b></p>		<p><b>RD Fee</b></p>		<p><b>RR Fee</b></p>		<p><b>RC Fee</b></p>		<p><b>SCRD Fee</b></p>		<p><b>SH Fee</b></p>	
<p><b>Affix Stamp Here</b>                  (if issued as an international certificate of mailing or for additional copies of this receipt). Postmark with Date of Receipt</p>		<p><b>Adult Signature Required</b>                  Adult Signature Restricted Delivery</p>		<p><b>Restricted Delivery</b>                  Restricted Delivery</p>		<p><b>Return Receipt</b>                  Return Receipt</p>		<p><b>Signature Confirmation</b>                  Signature Confirmation</p>		<p><b>Signature Confirmation Restricted Delivery</b>                  Signature Confirmation Restricted Delivery</p>		<p><b>Special Handling</b>                  Special Handling</p>		<p><b>US POSTAGE \$001.85</b>                  041032023                  041M12532405                  ZIP 78701</p>		<p><b>OFFICIAL BUSINESS</b>                  STATE OF TEXAS                  PENALTY FOR PRIVATE USE</p>		<p><b>RECEIVED</b>                  APR 04 2023                  TDI - ENFORCEMENT</p>		<p><b>EXHIBIT</b>                  D</p>													

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



# 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: 04/03/2023

Shipped From:

Name: MC ENF M RUIZ

Address: 1601 CONGRESS AVENUE SUITE 6 900

City: AUSTIN

State: TX ZIP+4® 78711

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 0043 4617 75

RICKETTS/31375



EXHIBIT

E



Firm Mailing Book For Accountable Mail



Name and Address of Sender

MC ENF M RUIZ  
 TEXAS DEPARTMENT OF INSURANCE  
 1001 CONGRESS AVENUE, SUITE 6.900  
 AUSTIN TX 78711

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

9214 8901 9403 8309 4724 49  
 RICKETTS/31375

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

JENIECIA BETHEA  
 [REDACTED]  
 SAN ANTONIO, TX 78251

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
0.84	4.15	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

**RECEIVED**  
 APR 04 2023  
 TDI - ENFORCEMENT

1515 10111213141516171819202122232425262728293031-123456789  
 APR 2023  
 CAPTCL  
 24

Postmaster's (Name of receiving employee)

*[Signature]*

Total Number of Pieces  
 1  
 Total Number of Pieces  
 Received at Post Office

Complete in Ink

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Firm Mailing Book For Accountable Mail

2023-8083

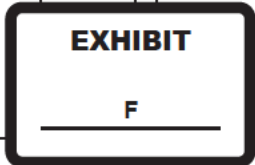
Name and Address of Sender  
 Texas Dept of Insurance  
 Mail Code ENF  
 1601 Congress Avenue, Suite 6.900  
 Austin TX 78711  
 Roxanne Rodriguez  
 June 12, 2023

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  
 (if issued as an international certificate of mailing or for additional copies of this receipt). Postmark with Date of Receipt

USPS Tracking/Article Number	Address (Name, Street, City, State, & Zip Code)	Postage	(Extra Services) 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	Special Handling
Ricketts/31375	Jenieceia Retha San Antonio, TX 78251			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

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2023-8083



# 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: 06/12/2023

Shipped From:

Name: ENF R RODRIGUEZ

Address: 1601 CONGRESS AVE

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 0045 0271 08

Ricketts/31375





Firm Mailing Book For Accountable Mail

Name and Address of Sender
ENF R. RODRIGUEZ
1601 CONGRESS AVE
STE 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.

2023-8083

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, S Fee. Includes address for Jeniecia Bethea in San Antonio, TX.

Total Number of Pieces Listed by Sender: 1

Total Number of Pieces Received at Post Office: 1

Postmaster, Per (Name of receiving employee)