

No. 2023-8095

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

**Date:** 7/25/2023

**Subject Considered:**

Raven Loupe  
[REDACTED]  
Conroe, Texas 77384

Default Order  
SOAH Docket No. 454-23-22122.C  
TDI Enforcement File No. 31646

**General remarks and official action taken:**

This is a default order taken against Raven Loupe (Respondent) because Respondent made a material misstatement in her license application about her Texas residency, and obtained her Texas license by fraud or misrepresentation when she did not in fact reside at the address she provided to the Texas Department of Insurance, or in Texas at all. Respondent did not respond to a Notice of Hearing filed by the Texas Department of Insurance. 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 Hearing

1. On June 23, 2023, the department 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. The department's factual allegations set out in the attached Notice of Hearing and Original Petition are incorporated in this order as findings of fact.

## 2023-8095

Commissioner's Order

Raven Loupe

SOAH Docket No. 454-23-22122

Page 2 of 5

3. The department sent the Notice of Hearing and Original Petition to Respondent's last known address provided in writing to the department, [REDACTED] Conroe, Texas 77384. The Notice of Hearing and Original Petition were also sent by electronic mail and to two additional addresses associated with Respondent: [REDACTED], Houma, Louisiana 70360, and [REDACTED], Houma, Louisiana 70364.
4. Respondent failed to file a written response to the Notice of Hearing within 20 days of the date the Notice of Hearing and Original Petition were mailed.

### Conclusions of Law

1. The commissioner has jurisdiction under Texas law, including TEX. INS. CODE §§ 82.051-82.055, 4001.002, 4001.254, 4005.101, 4005.102, 4101.004, 4101.051, and 4101.201; 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 file a written response to the Notice of 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 Notice of Hearing and Original Petition are incorporated in this order and deemed admitted as true under 28 TEX. ADMIN. CODE § 1.89.

# 2023-8095

Commissioner's Order

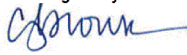
Raven Loupe

SOAH Docket No. 454-23-22122

Page 3 of 5

## Order

It is ordered that any licenses held by Raven Loupe 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.

DocuSigned by:  
  
FC5D7EDDFB4F8...

\_\_\_\_\_  
Cassie Brown  
Commissioner of Insurance

Prepared and reviewed by:



\_\_\_\_\_  
Sarah White, Staff Attorney  
Enforcement

# 2023-8095

Commissioner's Order  
Raven Loupe  
SOAH Docket No. 454-23-22122  
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 Raven Loupe. I have confirmed that:

- a. The last mailing address provided to the department in writing by Raven Loupe is [REDACTED] Conroe, Texas 77384.
- b. The file maintained by Enforcement contains a Notice of Hearing dated June 23, 2023, and an Original Petition dated June 22, 2023, which were filed together with the State Office of Administrative Hearings on June 23, 2023.
- c. On June 23, 2023, the Notice of Hearing and Original Petition addressed to Raven Loupe were mailed first-class and certified, return receipt requested, to her last known address and two additional addresses: [REDACTED], Houma, Louisiana 70360 and [REDACTED], Houma, Louisiana 70364.

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

DocuSigned by:

*David Moreno*

14ADC4A7499B468...

\_\_\_\_\_  
Affiant

# 2023-8095

Commissioner's Order

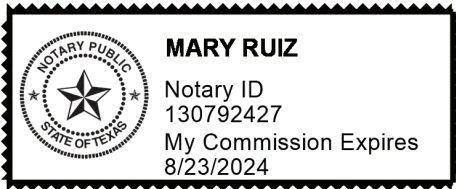
Raven Loupe

SOAH Docket No. 454-23-22122

Page 5 of 5

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 7/19/2023. This notarial act was an online notarization.

## Notary Seal



## Digital Certificate

DocuSigned by:  
*Mary Ruiz*  
795DC4D59167489...

---

Notary Public State of Texas

FILED **2023-8095**  
454-23-22122  
6/23/2023 12:45 PM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Amy Tippie , CLERK

ACCEPTED  
454-23-22122  
6/23/2023 12:47:02 pm  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
Amy Tippie , CLERK

**SOAH DOCKET NO. 454-23-22122**  
**TDI ENFORCEMENT FILE NO. 31646**

**TEXAS DEPARTMENT OF INSURANCE,**

**BEFORE THE STATE OFFICE**

**Petitioner**

**v.**

**OF**

**RAVEN LOUPE,**

**ADMINISTRATIVE HEARINGS**

**Respondent**

**NOTICE OF HEARING**

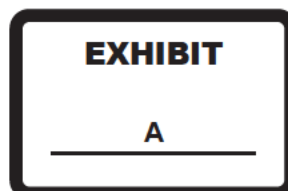
The Texas Department of Insurance seeks to take disciplinary action against you. This Notice of Hearing and the Original Petition, which is attached and incorporated for all purposes, states the allegations against you and the relief sought by the Department.

A public hearing will be held before an Administrative Law Judge on **Thursday, October 26, 2023, at 9 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.**



## 2023-8095

Notice of Hearing

Raven Loupe

SOAH Docket No. 454-23-22122

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 REVOCATION OF YOUR LICENSE, 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 REVOCATION OF YOUR LICENSE, 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)*  
Sarah White, Staff Attorney  
Texas Department of Insurance  
Enforcement, MC ENF

# 2023-8095

Notice of Hearing

Raven Loupe

SOAH Docket No. 454-23-22122

Page 3 of 5

P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 490-1020 (Fax)  
Sarah.white@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.**



## 2023-8095

Notice of Hearing

Raven Loupe

SOAH Docket No. 454-23-22122

Page 4 of 5

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

Respectfully Submitted,



---

Sarah White

State Bar No. 24064622

Texas Department of Insurance

Enforcement, MC ENF

P.O. Box 12030

Austin, Texas 78711-2030

(512) 676-6354 (Direct)

(512) 490-1020 (Fax)

Sarah.white@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  
Rachel Cloyd, Litigation Director, Enforcement, MC ENF  
Administrative Review, MC CO-AAL

**2023-8095**

Notice of Hearing

Raven Loupe

SOAH Docket No. 454-23-22122

Page 5 of 5

**CERTIFICATE OF SERVICE**

I, Sarah White, 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 23rd day of June, 2023 to:

Raven Loupe

[REDACTED]

Conroe, Texas 77384

Via CM/RRR No.: 9214 8901 9403 8320 1241 43

Via Email: [REDACTED]

[REDACTED]

Houma, Louisiana 70360

Via CM/RRR No.: 9214 8901 9403 8320 1242 66

[REDACTED]

Houma, Louisiana 70364

Via CM/RRR No.: 9214 8901 9403 8320 1243 72

*Respondent Pro Se*



Sarah White

**2023-8095**

FILED  
454-23-22122  
6/22/2023 9:12 AM  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
April Bermea , CLERK

SOAH Docket No. 454-23-22122

ACCEPTED  
454-23-22122  
6/22/2023 10:16:54 am  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS  
April Bermea , CLERK

**SOAH DOCKET NO. 454-\_\_\_\_\_**  
**TDI ENFORCEMENT FILE NO. 31646**

**TEXAS DEPARTMENT OF INSURANCE,**

**BEFORE THE STATE OFFICE**

**Petitioner**

**v.**

**OF**

**RAVEN LOUPE,**

**ADMINISTRATIVE HEARINGS**

**Respondent**

**ORIGINAL PETITION**

The Texas Department of Insurance seeks to take disciplinary action against Raven Loupe. 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 under TEX. INS. CODE §§ 82.051-82.055, 4001.002, 4001.254, 4005.101, 4005.102, 4101.004, 4101.051, and 4101.201; and TEX. GOV'T CODE §§ 2001.051-2001.178.

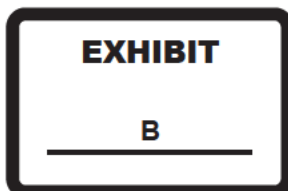
**Factual Allegations**

Licensure

1. Raven Loupe (Loupe), individual identification number 2593983, holds a an adjuster all-lines license issued by the Texas Department of Insurance (TDI) on July 28, 2022.

Misrepresentations in License Application

2. On or about July 27, 2022, Loupe applied for a Texas resident adjuster all-lines license to be issued by TDI.
3. Loupe marked Texas as her resident state and provided a Texas address in her license application.



4. After TDI granted Loupe's Texas license, the Louisiana Department of Insurance (LDI) informed TDI that Loupe admitted to Louisiana that she has not been and was never actually a resident of Texas.
5. Because Loupe was not and is not a Texas resident, she is not qualified to hold her Texas resident adjuster all-lines license which she obtained by fraud and misrepresentations.

### **Legal Allegations**

1. Under TEX. INS. CODE § 4001.254, TDI is required to revoke Loupe's resident license because she has not maintained the qualifications necessary to maintain the license under TEX. INS. CODE § 4101.053(a)(2)(B) and (D), specifically, she is not a Texas resident and is not trustworthy.
2. Loupe committed acts for which a license holder may be disciplined under TEX. INS. CODE § 4005.101, as contemplated in TEX. INS. CODE § 4005.102.
3. Loupe willfully violated an insurance law of this state, as contemplated by TEX. INS. CODE § 4005.101(b)(1).
4. Loupe has intentionally made a material misstatement in her license application, as contemplated by TEX. INS. CODE § 4005.101(b)(2).
5. Loupe has obtained or attempted to obtain a license by fraud or misrepresentation, as contemplated by TEX. INS. CODE § 4005.101(b)(3).
6. Loupe has engaged in fraudulent or dishonest acts or practices, as contemplated by TEX. INS. CODE § 4005.101(b)(5).

### **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. revoking Raven Loupe's license; and

2. imposing any other just and appropriate relief to which TDI may be entitled to by law.

Respectfully Submitted,



---

Sarah White  
State Bar No. 24064622  
Texas Department of Insurance  
Enforcement, MC ENF  
P.O. Box 12030  
Austin, Texas 78711-2030  
(512) 676-6354 (Direct)  
(512) 490-1020 (Fax)  
Sarah.white@tdi.texas.gov

ATTORNEY FOR THE PETITIONER  
TEXAS DEPARTMENT OF INSURANCE

**2023-8095**

**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Mary Ruiz on behalf of Sarah White  
Bar No. 24064622  
Enforcementgeneral@tdi.texas.gov  
Envelope ID: 76852999  
Filing Code Description: Request to Docket  
Filing Description: Request to Docket  
Status as of 6/22/2023 10:20 AM CST

Associated Case Party: Chief Clerk

Name	BarNumber	Email	TimestampSubmitted	Status
Chief Clerk		ChiefClerk@tdi.texas.gov	6/22/2023 9:12:03 AM	SENT

Associated Case Party: Texas Department of Insurance

Name	BarNumber	Email	TimestampSubmitted	Status
Texas Department of Insurance		Enforcementgeneral@tdi.texas.gov	6/22/2023 9:12:03 AM	SENT
Sarah White		Sarah.White@tdi.texas.gov	6/22/2023 9:12:03 AM	SENT
Rachel Cloyd		Rachel.Cloyd@tdi.texas.gov	6/22/2023 9:12:03 AM	SENT

Associated Case Party: Raven Loupe

Name	BarNumber	Email	TimestampSubmitted	Status
Raven Loupe		[REDACTED]	6/22/2023 9:12:03 AM	SENT

**2023-8095**

**Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Mary Ruiz on behalf of Sarah White  
Bar No. 24064622  
Enforcementgeneral@tdi.texas.gov  
Envelope ID: 76910531  
Filing Code Description: Notice of Hearing  
Filing Description: Notice of Hearing and Original Petition  
Status as of 6/23/2023 12:47 PM CST

Associated Case Party: Texas Department of Insurance

Name	BarNumber	Email	TimestampSubmitted	Status
Rachel Cloyd		Rachel.Cloyd@tdi.texas.gov	6/23/2023 12:45:24 PM	SENT
Sarah White		Sarah.White@tdi.texas.gov	6/23/2023 12:45:24 PM	SENT
Texas Department of Insurance		Enforcementgeneral@tdi.texas.gov	6/23/2023 12:45:24 PM	SENT
Leah Gillum		Leah.Gillum@tdi.texas.gov	6/23/2023 12:45:24 PM	SENT
Catarina Tapia		Catarina.Tapia@tdi.texas.gov	6/23/2023 12:45:24 PM	SENT

Associated Case Party: Chief Clerk

Name	BarNumber	Email	TimestampSubmitted	Status
Chief Clerk		ChiefClerk@tdi.texas.gov	6/23/2023 12:45:24 PM	SENT

Associated Case Party: Raven Loupe

Name	BarNumber	Email	TimestampSubmitted	Status
Raven Loupe		[REDACTED]	6/23/2023 12:45:24 PM	SENT

Firm Mailing Book For Accountable Mail

**Name and Address of sender**  
 Texas Dept of Insurance  
 Mail Code ENF  
 1601 Congress Avenue, Suite 6.900  
 Austin TX 78711  
 Mary Ruiz  
 June 23, 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	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SM Fee
WHITE/31646	RAVEN LOUPE CONROE, TEXAS 77384	0.90											
	RAVEN LOUPE HOUMA, LOUISIANA 70360	0.90											
	RAVEN LOUPE HOUMA, LOUISIANA 70364	0.90											
			Hand over \$50,000 in value										
			Hel.										

US POSTAGE \$001.62g  
 ZIP 78701  
 06/23/2023  
 041M1252405

OFFICIAL BUSINESS  
 STATE OF TEXAS  
 PENALTY FOR PRIVATE USE

RECEIVED  
 JUN 27 2023  
 TDI - ENFORCEMENT

12345678910111213141516171819202122232425262728293031  
 CAPTOL STATION  
 AUSTIN, TX  
 JUN 23 2023

EXHIBIT  
 C





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: 06/23/2023  
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	3
Total	3

\*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 3016 97



WHITE/31646

EXHIBIT

D



Firm Mailing Book For Accountable Mail

2023-8095

Name and Address of Sender  
 MC ENF M RUIZ  
 TEXAS DEPARTMENT OF INSURANCE  
 1601 CONGRESS AVENUE, SUITE 6 900  
 AUSTIN TX 78711  
**ENF**

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.

USPS Tracking/Article Number

1. 9214 8901 9403 8320 1241 43

WHITE/31646

2. 9214 8901 9403 8320 1242 66

3. 9214 8901 9403 8320 1243 72

Addressee (Name, Street, City, State, & ZIP Code™)  
 RAVEN LOUPE  
 [REDACTED]  
 CONROE, TEXAS 77384  
 RAVEN LOUPE  
 [REDACTED]  
 HOUMA, LOUISIANA 70360  
 RAVEN LOUPE  
 [REDACTED]  
 HOUMA, LOUISIANA 70364

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								2.10			
0.84	4.15								2.10			
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



Total Number of Pieces Listed by Sender: 3  
 Total Number of Pieces Received at Post Office: 3

Postmaster, Per (Name of receiving employee)

*[Signature]*

Complete in Ink

Privacy Notice: For more information on USPS privacy policies, visit usps.com/privacypolicy.