

No. **2026-9853**

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

Date: 03/25/2026

Subject Considered:

Texas Department of Insurance

v.

Jennifer Venegas

SOAH Docket No. 454-25-10802.C

Order Denying Motion for Rehearing

General Remarks and Official Action Taken:

The subject of this order is the motion for rehearing filed by Jennifer Venegas. This order denies Ms. Venegas' motion.

Background

On January 30, 2026, Commissioner's Order No. 2026-9775 was issued. The order revoked Ms. Venegas' general lines agent license with property and casualty and life, accident, health, and HMO qualifications. The order was issued following a hearing by an administrative law judge for the State Office of Administrative Hearings. The administrative law judge made and filed a proposal for decision containing a recommendation that the Texas Department of Insurance (TDI) revoke Ms. Venegas' license.

On February 24, 2026, Ms. Venegas submitted a motion to TDI styled as a "Motion For Rehearing." However, the motion cited Government Code § 2001.174, which provides the standard of review for a judicial appeal of an agency order, not a motion for rehearing.

Ms. Venegas' motion argued that (1) the record did not establish misappropriation under Government Code § 4005.101 because TDI did not prove that Ms. Venegas converted funds to her own use, misappropriated them, or illegally withheld them; (2)

the evidence does not support a finding of dishonest acts; (3) revocation is arbitrary and disproportionate when considering agency precedent (citing three previous commissioner orders where respondents' licenses were not revoked); and (4) the administrative law judge's credibility determination does not mandate revocation. The motion also argued that TDI ignored mitigating factors in deciding to revoke Ms. Venegas' license. The motion concluded by asking that a court either reverse the revocation, remand the matter to TDI for imposition of a lesser sanction, or modify the sanction to a suspension or probated suspension.

On March 11, 2026, TDI Enforcement staff (Enforcement) submitted a reply to Ms. Venegas' motion for rehearing. Enforcement pointed out that Ms. Venegas cited the wrong standard of review for a motion for rehearing.

Enforcement replied to Ms. Venegas' argument that the record did not establish misappropriation by citing the evidence that supported the finding of misappropriation, conversion, and illegally withholding funds, including Ms. Venegas' own testimony that she knew the money belonged to Old Republic but failed to pay the amounts owed because "she was busy" and the fact that Old Republic had to enlist the assistance of a collections agency to obtain its funds.

Enforcement replied to Ms. Venegas' argument that the evidence did not support a finding of dishonest acts by citing the evidence that supported the finding that Ms. Venegas acted dishonestly, including her failure to remit the amount owed, despite her representations that she would.

Enforcement replied to Ms. Venegas' arguments that revocation is arbitrary and the ALJ's findings do not support it by explaining how the previous commissioner orders that Ms. Venegas cited are distinguishable from her case.

Discussion

Under Government Code § 2001.146, a motion for rehearing must identify with particularity findings of fact or conclusions of law that are the subject of the complaint and any evidentiary or legal ruling claimed to be erroneous. The motion must also state the legal and factual basis for the claimed error.

Ms. Venegas' motion appears to be drafted as an appeal rather than a motion for rehearing, and it does not directly speak to the requirements for a motion for rehearing under Government Code § 2001.046. However, the motion does identify two

Commissioner's Order on Motion for Rehearing
TDI v. Jennifer Venegas
SOAH Docket No. 454-25-10802.C
Page 3 of 3

conclusions of law that Ms. Venegas believes to be wrong: Conclusion of Law No. 6, which says that Ms. Venegas misappropriated, converted, or illegally withheld money belonging to an insurer in violation of Insurance Code § 4005.101(b)(4)(A), and Conclusion of Law No. 7, which says that Ms. Venegas engaged in fraudulent or dishonest acts in violation of Insurance Code § 4005.101(b)(5).

Ms. Venegas asserts that the record supports neither of these conclusions of law. But Ms. Venegas made these same arguments in closing at the hearing and in the exceptions she filed following issuance of the proposal for decision, so these arguments were considered and rejected by the ALJ twice. Therefore, Ms. Venegas' motion does not raise any issues that warrant a rehearing.

Order

It is ordered that the motion for rehearing filed by Jennifer Venegas is denied.

Signed by:
Amanda Crawford
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Amanda Crawford
Commissioner of Insurance

Recommended and reviewed by:

Signed by:
Jessica Barta
5DAC5618BBC74D4...
Jessica Barta, General Counsel

Signed by:
Justin Beam
27ADF3DA5BAF4B7...
Justin Beam, Chief Clerk