

No. 2026-9829

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

Date: 03/06/2026

Subject Considered:

Beverley Patricia Claydon
Addison, Texas

Default Order
SOAH Docket No. 454-25-14326
TDI Enforcement File No. 34024

General remarks and official action taken:

This is a default order taken against Beverley Patricia Claydon (Respondent) because she: made a material misstatement in a license application; obtained a license by fraud or misrepresentation; engaged in fraudulent or dishonest acts or practices; and has been convicted of two federal felonies. Respondent did not appear at the hearing on the merits. This order revokes Respondent's licenses.

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

Findings of Fact

Failure to Appear at Hearing on the Merits

1. On October 31, 2025, the Texas Department of Insurance (TDI) filed a Second Amended Notice of Hearing, together with a previously filed Amended Petition, a Scheduling Order, and Order Granting Motion for Continuance, with the State Office of Administrative Hearings, and which attached documents were admitted as TDI's Exhibit 1 at the hearing on the merits.
2. TDI's factual allegations set out in the attached Second Amended Notice of Hearing and Amended Petition are incorporated in this order as findings of fact.

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Commissioner's Order
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3. TDI sent the Second Amended Notice of Hearing, Amended Petition, Scheduling Order, and Order Granting Motion for Continuance, together to Respondent's last known address provided in writing to TDI, [REDACTED], Addison, TX 75001-4324. The Second Amended Notice of Hearing, Amended Petition, Scheduling Order, and Order Granting Motion for Continuance were also sent to Respondent by electronic mail.
4. After being properly served the notice of the date, time and location of the hearing on the merits, Respondent failed to appear for the hearing on January 13, 2026, and the State Office of Administrative Hearings (SOAH) has remanded this matter to the commissioner for informal disposition by default, as shown in the record in SOAH Docket No. 454-25-14326.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, 4054.051 and 4054.301; TEX. OCC. CODE §§ 53.021-53.023; 28 TEX. ADMIN. CODE § 1.502¹; and TEX. GOV'T CODE §§ 2001.051-2001.178.
2. Based on Respondent's failure to appear in person or by legal representative at the hearing, the commissioner has authority to informally dispose of this case by default under TEX. GOV'T CODE §§ 2001.056(4) and 2001.058(d-1), and TEX. INS. CODE § 82.055.
3. The department provided proper notice of the hearing under TEX. GOV'T CODE §§ 2001.051, 2001.052, and 2001.054; TEX. INS. CODE § 4001.252(a)(1); and, 28 TEX. ADMIN. CODE §§ 1.28 and 19.906.
4. TDI's factual and legal allegations set out in the attached Second Amended Notice of Hearing and Amended Petition are incorporated in this order and were deemed admitted as true by SOAH under 1 TEX. ADMIN. CODE § 155.501(d)(1).


¹ All references to 28 TEX. ADMIN. CODE § 1.502 herein, are to the version of that rule pre-dating amendments adopted in Order 2023-8185, effective on and after September 26, 2023.

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Order

It is ordered that any licenses held by Beverley Patricia Claydon 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.

Signed by:

FE10434BC41A470...
Amanda Crawford
Commissioner of Insurance

Prepared and reviewed by:



Sarah White, Staff Attorney
Enforcement

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Commissioner's Order
Beverly Patricia Claydon
SOAH Docket No. 454-25-14326
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Affidavit

STATE OF TEXAS §

§

COUNTY OF TRAVIS §

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

"My name is Kelly Taylor 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 Beverly Patricia Claydon. I have confirmed that:

- a. The last mailing address provided to the department in writing by Beverly Patricia Claydon is [REDACTED], Addison, TX 75001-4324.
- b. The file maintained by Enforcement contains a Second Amended Notice of Hearing dated October 31, 2025, and an Amended Petition dated August 22, 2025, which were filed together with the State Office of Administrative Hearings, on October 31, 2025.
- c. On October 31, 2025, the Second Amended Notice of Hearing, Amended Petition, Scheduling Order, and the Order Granting Motion for Continuance, were addressed to Beverly Patricia Claydon and mailed first-class and certified, return receipt requested, to her last known address.

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

Signed by:

Kelly Taylor

F465570338BC4B3...

Affiant

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SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 2/9/2026. This notarial act was an online notarization.

Notary Seal



Digital Certificate

Signed by:
David Moreno
455E4109E15D4CD
Notary Public State of Texas

FILED **2026-9829**
454-25-14326
1/20/2026 9:57 AM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Brianna Flores, CLERK

ACCEPTED
454-25-14326
1/20/2026 11:30:59 am
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Brianna Flores, CLERK

SOAH DOCKET NO. 454-25-14326
TDI ENFORCEMENT FILE NO. 34024

TEXAS DEPARTMENT OF INSURANCE,

Petitioner

v.

BEVERLEY PATRICIA CLAYDON,

Respondent

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

TDI's Exhibit 1
Second Amended Notice of Hearing and
Amended Petition
TDI 0001-0024

FILED **2026-9829**
454-25-14326
10/31/2025 1:01 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Amy Robles, CLERK

ACCEPTED
454-25-14326
10/31/2025 2:42:36 pm
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Amy Robles, CLERK

**SOAH DOCKET NO. 454-25-14326
TDI ENFORCEMENT FILE NO. 34024**

TEXAS DEPARTMENT OF INSURANCE,

BEFORE THE STATE OFFICE

Petitioner

v.

OF

BEVERLEY PATRICIA CLAYDON,

ADMINISTRATIVE HEARINGS

Respondent

SECOND AMENDED NOTICE OF HEARING

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

A public hearing will be held before an Administrative Law Judge on **Tuesday, January 13, 2026, at 9 a.m.** The hearing will take place via videoconference using a videoconference platform controlled by the State Office of Administrative Hearings (SOAH), unless otherwise ordered to proceed in another manner by the Administrative Law Judge. The attached SOAH scheduling order includes the hyperlink and telephone contact information to attend the videoconference hearing.

The hearing will 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 will continue from day to day on the videoconference platform until concluded, unless otherwise ordered by the Administrative Law Judge. 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.

Your failure to appear on the day and time set for the hearing entitles TDI to move to proceed on a default basis, under 1 TEX. ADMIN. CODE § 155.501. If you don't appear, SOAH may grant TDI's motion, deem the allegations against you as true,



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Second Amended Notice of Hearing
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and issue a default dismissal or default proposal for decision. The Commissioner of Insurance may then issue a default order granting the relief sought, including revocation of your license.

Electronically Filing and Receiving Documents from SOAH

Under 1 TEX. ADMIN. CODE §§ 155.101, 155.103, and 155.105, you may file with SOAH an answer or written response to TDI's allegations, but you should also serve it on TDI and any other party. Any answer, response, or other pleading should be filed and served by mail, fax, hand-delivery, email, or filed electronically as instructed on SOAH's website, 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)
www.soah.texas.gov

- (2) Sarah White, Staff Attorney
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 490-1020 (Fax)
Sarah.White@tdi.texas.gov

SOAH offers you the ability to electronically file documents and receive orders and other documents issued by SOAH by email instead of by mail. If you want to electronically file documents or 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 or pre-file exhibits with SOAH. Again, instructions on how to electronically file documents and pre-file exhibits are on SOAH's website.

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

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Second Amended Notice of Hearing
Beverly Patricia Claydon
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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

Enclosures: Amended Petition, Order Resetting the Hearing, and SOAH Scheduling Order

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

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Second Amended Notice of Hearing
Beverley Patricia Claydon
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CERTIFICATE OF SERVICE

I, Sarah White, certify that a true and correct copy of the *Second Amended Notice of Hearing, the Amended Petition, the Order Resetting the Hearing, and the SOAH Scheduling Order* were sent by the following methods shown, on this 31st day of October, 2025 to:

Beverley Patricia Claydon
[REDACTED]
Addison, TX 75001-4324

Via CM/RRR No.: 9214 8901 9403 8340 6995 84
Via First Class Mail
Via Email: [REDACTED]

Respondent Pro Se



Sarah White

2026-9829

ACCEPTED
454-25-14326
8/22/2025 3:28:54 pm
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Kevin Garza, CLERK

FILED
454-25-14326
8/22/2025 1:32 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Kevin Garza, CLERK

**SOAH DOCKET NO. 454-25-14326
TDI ENFORCEMENT FILE NO. 34024**

TEXAS DEPARTMENT OF INSURANCE,

BEFORE THE STATE OFFICE

Petitioner

v.

OF

BEVERLEY PATRICIA CLAYDON,

ADMINISTRATIVE HEARINGS

Respondent

AMENDED PETITION

The Texas Department of Insurance is seeking to take disciplinary action against Beverley Patricia Claydon. TDI 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 4054.301; TEX. OCC. CODE §§ 53.021-53.023; 28 TEX. ADMIN. CODE § 1.502;¹ and TEX. GOV'T CODE §§ 2001.051-2001.178.

Factual Allegations

Licensure and Background

1. Beverley Patricia Claydon (Claydon), individual identification number 1831690, holds two active licenses issued by TDI:
 - a. a life agent license issued on March 13, 2018; and,
 - b. a general lines agent license with a life, accident, health, and HMO qualification, issued on July 14, 2020.

¹ All references to 28 TEX. ADMIN. CODE § 1.502 herein, are to the version of that rule pre-dating amendments adopted in Order 2023-8185, effective on and after September 26, 2023.

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2. According to TDI's records, Claydon's life agent license was initially issued and held under her previous name, "Beverlee Patricia Kamerling" from March 13, 2018, until April 12, 2018, when she changed her name to "Beverley P. Bryann."
3. Under her former name "Beverley P. Bryann," Claydon was issued a temporary general lines license with a life, accident, health, and HMO qualification by TDI on April 15, 2020, which expired July 14, 2020, when she was granted her general lines license.
4. Claydon changed her name in TDI's records to "Beverley Patricia Claydon" effective August 7, 2020.
5. In addition, civil and criminal court records show Claydon has held herself out under several other aliases and spelling variations of her former and current names, including but not limited to: Beverlee Claydon, Beverly Claydon, Beverley Clayton, and B. Patricia Claydon.
6. For purposes of this Amended Petition, all references to Claydon include her aliases, spelling variations, and any former and current names.

Claydon's Aged Fingerprints

7. All applicants are required to submit fingerprints to TDI or already have fingerprints on file with TDI, when applying for a Texas resident insurance license.
8. When Claydon applied for her life agent license in 2018, she provided fingerprints to TDI and answered "yes" to this question in her license application: "Have you ever been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony?"
9. Claydon's fingerprints were initially rejected due to poor quality of the fingerprint characteristics, and TDI requested she resubmit them. After resubmission, Claydon's fingerprints were found to be "aged fingers," meaning that due to her age, the fingerprints could not be matched to existing fingerprint images in the FBI's CJIS database.
10. Despite the "aged fingerprints" and Claydon's "yes" answer to the felony question, TDI's Agent and Adjuster Licensing staff handling the initial processing of the

license application made a mistake, and granted Claydon her life agent license in 2018, without referring the application for further review and investigation of her criminal history.

11. Upon information and belief, Claydon had been released from federal prison at the time she submitted that license application to TDI, but she was still under federal court supervision for her two felony convictions, as described below.

Failed to Obtain Commissioner's Waiver to Engage in Business of Insurance

12. Claydon's two felony convictions, as described below, involved dishonesty or breach of trust as specified in 18 U.S.C. § 1033 and therefore required, and continues to require, written consent from the commissioner of insurance to engage or participate in the business of insurance when she was mistakenly granted the life agent license in 2018.
13. However, Claydon did not receive this written consent when she was licensed nor has she since received this written consent.

Material Misrepresentation in 2020 Temporary License Application

14. When Claydon applied for her temporary general lines license on April 15, 2020, she answered "no" to the application question: "Have you ever been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony?"
15. Claydon's "no" answer was false, deceptive, and material to TDI because she failed to disclose a felony conviction and at that time, TDI did *not* have fingerprints from Claydon that could be matched to the FBI's CJIS database.
16. In the 2020 temporary license application, Claydon claimed exemption from submitting a fingerprint receipt with the application based on being an applicant with an active Texas license and having already submitted fingerprints to TDI with another license application.
17. Because Claydon was at that time already mistakenly licensed, TDI 's vendor granted her this temporary license without requiring new fingerprints or a criminal background check.

Two Felony Convictions

18. On April 23, 2009, in case no. CR07-410RAJ, in the United States District Court Western District of Washington at Seattle, Claydon pleaded guilty to and was convicted of two federal felonies, specifically:
 - a. one count of felony conspiracy to commit securities fraud and mail fraud; and
 - b. one count of felony conspiracy to obstruct justice.
19. On August 7, 2009, the District Court sentenced Claydon to 90 months (approximately 7.5 years) in federal prison for these convictions and her role in what has been described by the U.S. Department of Justice Federal Bureau of Investigations (FBI) as a "Pump and Dump" Securities Scheme.²
20. The District Court ordered Claydon to pay \$2,471,784 in restitution to the nearly 3,400 victims of her scheme.
21. The District Court also ordered Claydon to serve three years of supervised release following her release from imprisonment. In addition to the standard conditions of supervised release, the District Court imposed special conditions related to Claydon's financial information and interests and involvement in businesses which prohibited her from opening new lines of credit.
22. Upon information and belief, Claydon was not released from prison until sometime in February 2017, and was not released from court supervision until approximately February 2020 – meaning, that Claydon was still under federal court supervision when TDI mistakenly granted her a life agent license.

U.S. and Canadian Litigation Showing Fraudulent and Dishonest Acts and Practices

U.S. Securities and Exchange Commission

23. On June 15, 1997, the U.S. Securities and Exchange Commission filed a complaint against Claydon seeking permanent injunctive relief and other relief due to her violations of several federal securities laws and rules. Specifically, the complaint alleged that Claydon, secretly controlled stocks of United Fire Technology, Inc.

² <https://archives.fbi.gov/archives/seattle/press-releases/2009/se080709.htm>

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(UFT) and directed UFT to conduct an unregistered distribution of common stock and disseminate materially misleading information about UFT to investors.

24. On August 30, 1999, in cause no. C97-1151CR in the United States District Court for the Western District of Washington at Seattle, the court entered a final judgment of permanent injunctive relief by consent against Claydon.
25. The District Court permanently enjoined and restrained Claydon from, directly or indirectly, singly or in concert:
 - a. making use of any means or instruments of transportations or communication in interstate commerce or of the mails to sell a security;
 - b. carrying or causing to be carried through the mails or in interstate commerce, by any means or instruments of transportation, any security for the purpose of sale or for delivery after sale unless a registration statement is in effect;
 - c. making use of any means or instruments of transportation or communication in interstate commerce or of the mails to offer to sell or offer to buy though the use or medium of any prospectus or otherwise any security, unless a registration has been filed;
 - d. in the offer or sale of any securities, by the use of any means or instrument of transportation or communication in interstate commerce or by the use of the mails, from:
 - i. employing any device, scheme, or artifice to defraud;
 - ii. obtaining money or property by means of any untrue statement of a material fact or any omission necessary to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and
 - iii. engaging in any transaction, practice, or course of business which operates or would operate as to fraud or deceit upon the purchaser; and;

- e. in connection with the purchase or sale of any security, by the use of any means or instrumentality or interstate commerce or of the mails, or of any facility of any national securities exchange, from:
 - i. employing any device, scheme, or artifice to defraud;
 - ii. obtaining money or property by means of any untrue statement of a material fact or any omission necessary to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and
 - iii. engaging in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.
26. The District Court also found that Claydon's conduct demonstrated substantial unfitness to serve as an officer or director of any issue that has a class of securities registered pursuant to § 12 of the Exchange Act, 15 U.S.C. § 781, or that is required to file reports pursuant to § 15(d) of the Exchange Act, and 15 U.S.C. § 78o(d), and therefore she is permanently prohibited from acting as an officer or director of any such entity.
27. Finally, the District Court ordered Claydon to jointly and severally disgorge \$1,066,515.80 plus pre-judgment interest of \$412,570.71, that she and WWBM Consultants, Inc. received through the issuance and sale of UFT stock in violation of anti-fraud provisions of federal securities laws.

Alberta Securities Commission of Canada

28. On June 15, 2007, after a hearing, the Alberta Securities Commission of Canada issued its Merit Decision against Claydon and two other persons, Tracey Lee Kroeker (Kroeker) and Tolan Shigeo Furusho (Furusho),³ in the matter of: *Kroeker, Re, 2007 ABASC 381*. The Alberta Securities Commission found that Claydon was not registered and had not filed any prospectus before trading and selling shares of Goldtech Mining Corporation, a Nevada corporation, to Alberta residents, and therefore engaged in the illegal distribution of securities contrary to Alberta's Securities Act. Since Claydon did not comply with the registration and prospectus

³ The hearing and decision involved allegations additional persons and corporations. The Commission states that another panel dealt with the allegations and sanction imposed on those other parties.

requirements of Alberta's Securities Act, the decision found she acted contrary to the public interest by depriving Alberta investors of fundamental protections.

29. On October 9, 2007, the Alberta Securities Commission ordered sanctions against Claydon in the matter of: *Kroeker, Re, 2007 ABASC 748*. Specifically, the Alberta Securities Commission ordered Claydon to cease trading in or purchasing securities, denied her the use of all exemptions under Alberta's securities laws, permanently prohibited her from acting as a director or officer of any issuer, and imposed a \$50,000 administrative penalty. She was also ordered to pay \$25,000 for a portion of the costs of the investigation and hearing.

British Columbia Securities Commission of Canada

30. On April 7, 2008, the British Columbia Securities Commission of Canada entered an order against Claydon, number 2008 BCSECCOM 189, based on the findings and order imposed by the Alberta Securities Commission.
31. The British Columbia Securities Commission ordered Claydon:
- a. must permanently cease trading in and is permanently prohibited from purchasing securities (with one exception);
 - b. must resign any position she holds as, and is permanently prohibited from becoming or acting as, a director or officer of any issuer, registrant, or investment fund manager;
 - c. is permanently prohibited from becoming or acting as a registrant, investment fund manager, or promoter;
 - d. is permanently prohibited from acting in a management or consultative capacity in connection with activities in the securities market; and
 - e. is permanently prohibited from engaging in investor relations activities.

Manitoba Securities Commission of Canada

32. On September 17, 2008, the Manitoba Securities Commission of Canada entered Order No. 5772 against Claydon, Kroeker, and Furusho, based on the findings and order imposed by the Alberta Securities Commission.
33. The Manitoba Securities Commission ordered Claydon to cease trading in securities, to resign any position she holds as a director or officer or both of any issuer, and permanently prohibited her from becoming or acting as a director or officer or both of any issuer.

Legal Allegations

1. Claydon committed acts for which a license holder may be disciplined under TEX. INS. CODE § 4005.101(b) because she:
 - a. has intentionally made a material misstatement in the license application, in violation of TEX. INS. CODE § 4005.101(b)(2);
 - b. has obtained or attempted to obtain a license by fraud or misrepresentation, in violation of TEX. INS. CODE § 4005.101(b)(3);
 - c. engaged in fraudulent or dishonest acts or practices, in violation of TEX. INS. CODE § 4005.101(b)(5); and
 - d. has been convicted of a felony, as contemplated by TEX. INS. CODE § 4005.101(b)(8).
2. Claydon committed a felony offense and has engaged in fraudulent or dishonest activity that directly relates to the duties and responsibilities of the licensed occupation, as contemplated in 28 TEX. ADMIN. CODE §§ 1.502(d) and (f).
3. Claydon committed an offense that TDI considers to be of such serious nature that it is of prime importance in determining fitness for licensure or authorization, as contemplated by 28 TEX. ADMIN. CODE § 1.502(e) and TEX. OCC. CODE §§ 53.021-53.023.

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4. Claydon committed an offense for which fraud, dishonesty, or deceit is an essential element as contemplated by 28 TEX. ADMIN. CODE § 1.502(e)(1).
5. Claydon committed a felony offense involving moral turpitude or breach of fiduciary duty as contemplated by 28 TEX. ADMIN. CODE § 1.502(e)(3).
6. 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 the department determines that, the applicant has committed an offense that directly relates to the duties and responsibilities of the licensed occupation;
 - c. considers any offense for which fraud, dishonesty or deceit is an essential element to be of prime importance when determining fitness for licensure; and
 - d. considers any felony involving moral turpitude or breach of fiduciary duty to be a crime of prime importance when determining fitness for licensure.
7. Claydon has been convicted of a felony involving dishonesty or breach of trust as specified in 18 U.S.C. § 1033 and requiring written consent from the commissioner of insurance to engage or participate in the business of insurance.

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. revoking Beverley Patricia Claydon's licenses;
2. denying Beverley Patricia Claydon consent to engage or participate in the business of insurance under 18 U.S.C. § 1033; and
3. imposing any other just and appropriate relief to which the department may be entitled to by law, including any combination of the above actions.

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AMENDED PETITION

SOAH DOCKET NO. 454-25-14326

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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

2026-9829

FILED
454-25-14326
3/13/2025 4:31 PM
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Amy Robles, CLERK

SOAH Docket No. 454-25-14326

Suffix: C

**BEFORE THE
STATE OFFICE OF ADMINISTRATIVE
HEARINGS**

**TEXAS DEPARTMENT OF INSURANCE,
PETITIONER
V.
BEVERLEY PATRICIA CLAYDON,
RESPONDENT**

ORDER SCHEDULING HEARING ON THE MERITS

1. **Case Referred.** This case has been docketed at the State Office of Administrative Hearings (SOAH) and assigned to the undersigned Administrative Law Judge (ALJ). The parties are encouraged to visit SOAH's website at www.soah.texas.gov for information about hearings, including a link to SOAH's procedural rules, which govern this case.
2. **Hearing.** A hearing will be held at **9:00 AM (CT) on August 29, 2025**, remotely via Zoom videoconference. 1 Tex. Admin. Code § 155.405(c). The audio portion of the hearing will be recorded, and it will be the official record of the proceeding. Attend the hearing in one of these ways:

To join by computer or smart device, go to
<https://soah-texas.zoomgov.com> and enter:

Meeting ID: 160 812 9260

Video Passcode: TDC326

To join by telephone (audio only), call
+1 669 254 5252, and enter:

Meeting ID: 160 812 9260

Telephone Passcode: 009916

3. **Notice.** Staff for the Texas Department of Insurance must issue a notice of hearing. Tex. Gov't Code §§ 2001.051–.052.
4. **Three Business Days Before the Hearing.** The following must be done at least three business days before the hearing. Failure to comply with these requirements may result in the exclusion of evidence.
 - a. **Exhibits:**
 - Make an exhibit list;
 - Number each exhibit sequentially; and
 - Paginate or bates stamp multipage documents.
 - b. **Witness List:**
 - Identify each witness you will call to testify;
 - Mention what each witness will testify about; and
 - Estimate how long each witness will testify.
 - c. **Witnesses:**
 - Give each witness the information to access the hearing;

- Give each witness the documents needed to participate in the hearing;
- Have each witness's contact information available so additional documents can be provided to each witness during the hearing if needed.

d. **Upload Your Exhibit List, Exhibits, and Witness List.**

- Upload your exhibit list, exhibits, and witness list using Kiteworks by going to <https://soah.kiteworks.com/form/upload#/>
- Exhibits must be labeled by party, exhibit number, and description.
- You can submit ten files or folders per upload. Contents of folders must be clearly identified.
- Separate CONFIDENTIAL exhibits from non-confidential exhibits. Upload confidential exhibits with separate uploads in Kiteworks. Select the appropriate security classification in the "Designate Classification" field in Kiteworks. Confidential files and folders must be clearly labeled "CONFIDENTIAL."
- Further information may be found [here](#).

e. **Share Your Exhibit List, Exhibits, and Witness List.**

- Send your exhibit list, exhibits, and witness list to the other parties.
- Uploading documents through Kiteworks sends them to the judge but not to the other parties.
- Talk to the other party to confirm they received your documents. Be prepared to show that you gave them the documents. *See* 1 Tex. Admin. Code § 155.429(b)(4)(B).

5. **One Business Day After the Hearing, File Admitted Exhibits.** The first business day after the hearing, the parties must eFile only the exhibits that were admitted as evidence or accompanied by an offer of proof. 1 Tex. Admin. Code § 155.101(b)(1)(G)(iii). The admitted exhibits and offer of proof will constitute the official evidentiary record of the proceeding. *See* 1

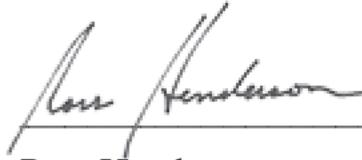
Tex. Admin. Code § 155.101(b)(1)(A). For more information, see the SOAH [General Order](#).

6. **eFile.** Except as otherwise permitted by the SOAH Rules of Procedure, attorneys, state agencies, and other governmental entities are required to file pleadings electronically through eFileTexas.gov and an electronic filing service provider certified by the Texas Office of Court Administration. *See* 1 Tex. Admin. Code § 155.101.
7. **Representing Yourself.**
 - a. **A Guide.** Some parties choose to represent themselves in the contested-case process. Self-represented litigants must follow SOAH’s procedures, but SOAH has published material that will help parties understand how to do that. Here is the Guide for Self Represented Litigants: <https://www.soah.texas.gov/representing-yourself-general-hearings-cases-state-office-administrative-hearings>.
 - b. **Filings.** If you are not represented by an attorney and you do not wish to file documents using eFileTexas, you may file documents in one of these ways: by email to GeneralDocketFax@soah.labusa.com; by mail addressed to SOAH, P.O. Box 13025, Austin, Texas 78711-3025; or by hand delivery to the appropriate SOAH office. All filings must contain the SOAH docket number and the names of the parties. For documents filed by mail, fax, or hand-delivery, the time of filing shall be determined by the SOAH file stamp.
 - c. **Electronic Service of SOAH orders.** You can receive documents from SOAH by email. To elect to receive service of SOAH-issued documents by email, go to the E-Services tab on SOAH’s website (www.soah.texas.gov), click on “Request Email Service” and follow the instructions. NOTE: Your request to receive SOAH-issued documents by email does not change the procedures you must follow in order to file documents with SOAH.
 - d. **Filing Admitted Exhibits.** Under certain circumstances, SOAH may file admitted exhibits on behalf of self-represented litigants.

8. **Questions about Zoom, Kiteworks, or Filings.** Call SOAH's Chief Clerk's Office at (512) 475-4993.

Signed March 13, 2025.

ALJ Signature(s):

A handwritten signature in cursive script, appearing to read "Ross Henderson", is written over a horizontal line.

Ross Henderson,

Presiding Administrative Law Judge

2026-9829

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.

Envelope ID: 98443079

Filing Code Description: Order Scheduling Hearing on the Merits

Filing Description: ORDER SCHEDULING HEARING ON THE MERITS

Status as of 3/13/2025 4:36 PM CST

Associated Case Party: Beverley Patricia Claydon

Name	BarNumber	Email	TimestampSubmitted	Status
Beverley Patricia Claydon		[REDACTED]	3/13/2025 4:31:05 PM	SENT

Associated Case Party: Texas Department of Insurance

Name	BarNumber	Email	TimestampSubmitted	Status
Rachel Cloyd		Rachel.Cloyd@tdi.texas.gov	3/13/2025 4:31:05 PM	SENT
Sarah White		Sarah.White@tdi.texas.gov	3/13/2025 4:31:05 PM	SENT
Texas Department of Insurance		Enforcementgeneral@tdi.texas.gov	3/13/2025 4:31:05 PM	SENT

Associated Case Party: Chief Clerk

Name	BarNumber	Email	TimestampSubmitted	Status
Chief Clerk		ChiefClerk@tdi.texas.gov	3/13/2025 4:31:05 PM	SENT

2026-9829

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: 104736887
Filing Code Description: Notice of Hearing
Filing Description: Amended NOH
Status as of 8/22/2025 3:30 PM CST

Associated Case Party: Texas Department of Insurance

Name	BarNumber	Email	TimestampSubmitted	Status
Rachel Cloyd		Rachel.Cloyd@tdi.texas.gov	8/22/2025 1:32:00 PM	SENT
Sarah White		Sarah.White@tdi.texas.gov	8/22/2025 1:32:00 PM	SENT
Texas Department of Insurance		Enforcementgeneral@tdi.texas.gov	8/22/2025 1:32:00 PM	SENT
Leah Gillum		Leah.Gillum@tdi.texas.gov	8/22/2025 1:32:00 PM	SENT
Jodie Delgado		jodie.delgado@tdi.texas.gov	8/22/2025 1:32:00 PM	SENT

Associated Case Party: Chief Clerk

Name	BarNumber	Email	TimestampSubmitted	Status
Chief Clerk		ChiefClerk@tdi.texas.gov	8/22/2025 1:32:00 PM	SENT

Associated Case Party: Beverley Patricia Claydon

Name	BarNumber	Email	TimestampSubmitted	Status
Beverley Patricia Claydon		[REDACTED]	8/22/2025 1:32:00 PM	SENT

**BEFORE THE
STATE OFFICE OF ADMINISTRATIVE
HEARINGS**

**TEXAS DEPARTMENT OF INSURANCE,
PETITIONER
V.
BEVERLEY PATRICIA CLAYDON,
RESPONDENT**

ORDER GRANTING MOTION FOR CONTINUANCE

Having considered the motion for continuance filed on October 30, 2025, the motion is **GRANTED**. Accordingly, this case is reset and will convene via Zoom videoconference on **January 13, 2026 at 9:00 AM (CT)**.

To join by computer or smart device, go to <https://soah-texas.zoomgov.com> and enter:

Meeting ID: 160 812 9260

Video Passcode: TDC326

2026-9829

To join by telephone (audio only), call +1 669 254 5252, and enter:

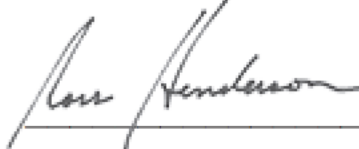
Meeting ID: 160 812 9260

Telephone Passcode: 009916

All other prehearing instructions in the prior Order Scheduling Hearing on the Merits remain in effect.

Signed October 31, 2025

ALJ Signature:

A handwritten signature in black ink, appearing to read "Ross Henderson", is written over a horizontal line.

Ross Henderson

Presiding Administrative Law Judge

2026-9829

Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing 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: 107533062
Filing Code Description: Amended Petition
Filing Description: Amended NOH OP Order 34024
Status as of 10/31/2025 2:43 PM CST

Associated Case Party: Texas Department of Insurance

Name	BarNumber	Email	TimestampSubmitted	Status
Rachel Cloyd		Rachel.Cloyd@tdi.texas.gov	10/31/2025 1:01:54 PM	SENT
Leah Gillum		Leah.Gillum@tdi.texas.gov	10/31/2025 1:01:54 PM	SENT
Sarah White		Sarah.White@tdi.texas.gov	10/31/2025 1:01:54 PM	SENT
Texas Department of Insurance		Enforcementgeneral@tdi.texas.gov	10/31/2025 1:01:54 PM	SENT
Jodie Delgado		jodie.delgado@tdi.texas.gov	10/31/2025 1:01:54 PM	SENT

Associated Case Party: Chief Clerk

Name	BarNumber	Email	TimestampSubmitted	Status
Chief Clerk		ChiefClerk@tdi.texas.gov	10/31/2025 1:01:54 PM	SENT

Associated Case Party: Beverley Patricia Claydon

Name	BarNumber	Email	TimestampSubmitted	Status
Beverley Patricia Claydon		[REDACTED]	10/31/2025 1:01:54 PM	SENT

2026-9829

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.

Chief Clerk on behalf of Justin Beam
Bar No. 24036199
chiefclerk@tdi.texas.gov
Envelope ID: 110227701
Filing Code Description: Filed Record Exhibits
Filing Description: TDI_EX01
Status as of 1/20/2026 11:36 AM CST

Associated Case Party: Texas Department of Insurance

Name	BarNumber	Email	TimestampSubmitted	Status
Rachel Cloyd		Rachel.Cloyd@tdi.texas.gov	1/20/2026 9:57:12 AM	SENT
Sarah White		Sarah.White@tdi.texas.gov	1/20/2026 9:57:12 AM	SENT
Texas Department of Insurance		Enforcementgeneral@tdi.texas.gov	1/20/2026 9:57:12 AM	SENT

Associated Case Party: Chief Clerk

Name	BarNumber	Email	TimestampSubmitted	Status
Chief Clerk		ChiefClerk@tdi.texas.gov	1/20/2026 9:57:12 AM	SENT

Associated Case Party: Beverley Patricia Claydon

Name	BarNumber	Email	TimestampSubmitted	Status
Beverley Patricia Claydon		[REDACTED]	1/20/2026 9:57:12 AM	SENT

2026-9829

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 78701
David Moreno 10/31/2025

- Adult Signature Required
- Adult Signature Restricted Delivery
- Certified Mail
- Certified Mail Restricted Delivery
- Collect on Delivery (COD)
- Insured Mail
- Priority Mail
- First-Class 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

Address (Name, Street, City, State, & Zip Code)
Beverley Patricia Claydon
[Redacted]
Addison, TX 75001-4324

Postage

2.44

SH Fee	
SGRD Fee	
RR Fee	
ASRO Fee	
ASR Fee	
One Sender if COD	
Insured Value	
Actual Value if Registered	
Handling Charge	
Extra Service Fee	

quadrant
CORRECTION IMI
\$002.40
10/31/2025 ZIP 78701
043M3226695



Handling Charge if Registered and o

Adult Signature Required

Adult Signature Restricted Deliva

Restricted Delivery

Return Receipt

Signature Confirmation

Signature Confirmation Restricted Deliv

Special Handling

Total Number of Pieces Listed by Sender

Postmaster, Per (Name of receiving employee)

PS Form 3877, June 2015

Completed in Ink

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: 10/31/2025
 Shipped From:
 Name: MC ENF D MORENO
 Address: 1601 CONGRESS AVENUE SUITE 6 900
 City: AUSTIN
 State: TX ZIP+4® 78701



Type of Mail	Volume
Priority Mail Express®	
Priority Mail®	
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 0065 7756 38



Sarah/34024

EXHIBIT

B



Name and Address of Sender

MC ENF D MORENO
TEXAS DEPARTMENT OF INSURANCE
1601 CONGRESS AVENUE, SUITE 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

USPS Tracking/Article Number

1. 9214 8901 9403 8340 6995 84

Sarah/34024

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

BEVERLEY PATRICIA CLAYDON

ADDISON, TX 75001-4324

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



2026-9829

Firm Mailing Book For Accountable Mail

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
2.72	5.30	Handling Charge - if Registered and over \$50,000 in value					Adult Signature Restricted Delivery	Restricted Delivery	Return Receipt	Signature Confirmation	Signature Confirmation Restricted Delivery	Special Handling



Total Number of Pieces Listed by Sender: 1

Total Number of Pieces Received at Post Office: 1

Postmaster, Per (Name of receiving employee)

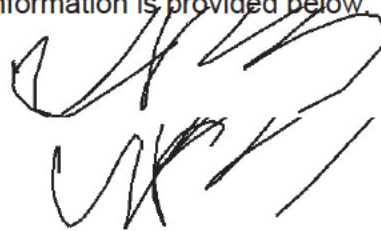
Complete in Ink

Date Produced: 11/04/2025

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8340 6995 84. Our records indicate that this item was delivered on 11/03/2025 at 11:13 a.m. in ADDISON, TX 75001. The scanned image of the recipient information is provided below.

Signature of Recipient :



Address of Recipient : [REDACTED] **ADDISON,**
TX 75001

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

This USPS proof of delivery is linked to the customers mail piece information on file as shown below:

[REDACTED] DON
ADDISON, TX 75001-4324

Customer Reference Number: C6328508.38536141
Return Reference Number Sarah/