No. **2026-9967**

Official Order
of the
Texas Commissioner of Insurance

Date: 06/11/2026

Subject Considered:

Crystal Insurance Company, Inc.
22803 Schiel Rd.
Cypress, Texas 77433-4262

Consent Order
TDI Enforcement File No. 37637

General remarks and official action taken:

This is a consent order with Crystal Insurance Company, Inc. (Crystal Insurance) for failing to timely file its: annual report; its audited financial condition report; and its accountant's letter of qualifications, registration, and accountant awareness letter. Crystal Insurance has agreed to pay an administrative penalty of $21,000.

Waiver

Crystal Insurance acknowledges that the Texas Insurance Code and other applicable law provide certain rights. Crystal Insurance waives all of these rights, and any other applicable procedural rights, in consideration of the entry of this consent order.

Findings of Fact

Background and Licensure

1. Crystal Insurance has held a certificate of authority to operate as a captive insurance company and transact business in the state of Texas since November 20, 2019.

2. The Texas Insurance Code requires an authorized captive insurance company to file with the commissioner:

   a. on or before March 1 of each year, a statement of the company's financial condition, verified by two of its executive officers and filed in a format prescribed by the commissioner which includes an actuarial report (the Annual Statement); and

   b. on or before June 1 of each year, a report of its financial condition at last year-end with an independent certified public accountant's opinion of the company's financial condition (the Financial Condition Report).

3. In addition, the Texas Insurance Code requires captive insurance companies to:

   a. submit an accountant's letter of qualification together with its audited Financial Condition Report; and

   b. not later than December 31 of the calendar year being covered by that report:
      i. register the name and address of the accountant preparing it; and
      ii. provide the accountant's signed letter of awareness with the registration.

4. The Texas Insurance Code allows the commissioner to waive the requirement for a captive insurance company to file an actuarial report with its Annual Statement if the commissioner determines that the company has less than $1 million of net written premium or reinsurance assumed.

5. The Texas Insurance Code further allows the commissioner to waive the requirements for the Financial Condition Report for certain captive insurance companies that have less than $1 million of net written premium or reinsurance assumed.

<u>Failure to Timely File Annual Statement and Related Documents</u>

6. For calendar year 2024, Crystal Insurance failed to register its accountant and timely file its accountant's letter of qualifications and awareness letter, on or before December 31, 2024.

7. Crystal Insurance then failed to timely file its calendar year 2024 Annual Statement by March 1, 2025.

8. On May 1 and May 29, 2025, TDI emailed Crystal Insurance to inquire about the status of the outstanding Annual Statement, but Crystal Insurance did not respond.

9. Crystal Insurance also failed to timely file its calendar year 2024 Financial Condition Report by June 1, 2025.

10. On June 17, 2025, TDI again emailed Crystal Insurance regarding all outstanding filings.

11. On July 1, 2025, Crystal Insurance emailed TDI representing that all outstanding filings would be submitted that day. However, Crystal Insurance did not submit the outstanding filings that day.

12. On August 12 and September 9, 2025, TDI again emailed Crystal Insurance regarding its outstanding filings, without a response.

13. On November 19, 2025, Crystal Insurance late-filed the following:

    a. in lieu of an actuarial report, it late-filed the calendar year 2024 Annual Statement accompanied by a Captive Actuarial Opinion Waiver Affidavit, which were 263 days late; and

    b. in lieu of its calendar year 2024 Financial Condition Report, it late-filed an Affidavit for Exemption from Filing CPA Report, which was 171 days late.

14. Pursuant to the terms of TEX INS. CODE § 964.060(d), TDI approved and accepted Crystal Insurance's Captive Actuarial Opinion Waiver Affidavit, in lieu of an actuarial report with its Annual Statement.

15. Pursuant to the terms of TEX INS. CODE § 401.006, TDI approved and accepted the Affidavit of Exemption for Filing CPA Report, in lieu of Crystal Insurance's 2024 Financial Condition Report.

Subsequent Events

16. Crystal Insurance represents that it has taken corrective measures to ensure future filings are submitted timely, including enhanced internal controls and using external advisor oversight for regulatory compliance.

Conclusions of Law

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 964.002, 964.055, 964.058, and 964.065.

2. The commissioner has the authority to informally dispose of this matter as set forth in TEX. GOV'T CODE § 2001.056, and TEX. INS. CODE §§ 36.104 and 82.055.

3. Crystal Insurance has knowingly and voluntarily waived all procedural rights to which it may have been entitled regarding the entry of this order, including, but not limited to, issuance and service of notice of intention to institute disciplinary action, notice of hearing, a public hearing, a proposal for decision, rehearing by the commissioner, and judicial review.

4. Crystal Insurance violated TEX. INS. CODE § 964.060(b)(1) by failing to timely file its calendar year 2024 Annual Statement.

5. Crystal Insurance violated TEX. INS. CODE § 964.060(b)(2) by failing to timely file either its calendar year 2024 Financial Condition Report, or a request for a waiver.

6. Crystal Insurance violated TEX. INS. CODE § 401.013(a) by failing to timely file its accountant's letter of qualifications, or a request for a waiver.

7. Crystal Insurance violated TEX. INS. CODE § 401.014(a) and (b) by failing to timely file its accountant registration and accountant awareness letter, or a request for a waiver.

Order

It is ordered that Crystal Insurance Company, Inc. pay an administrative penalty of $21,000 within 30 days from the date of this order. The administrative penalty must be paid as instructed in the invoice, which the department will send after entry of this order.

Signed by:
Amanda Crawford
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Amanda Crawford
Commissioner of Insurance

Recommended and reviewed by:

Leah Gillum

Leah Gillum, Deputy Commissioner
Fraud and Enforcement Division

Kaycee Crisp

Kaycee Crisp, Staff Attorney
Enforcement

Affidavit

STATE OF Texas §
§
COUNTY OF Harris §

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

"My name is Anna Nguyen. I am of sound mind, capable of making this statement, and have personal knowledge of these facts which are true and correct.

I hold the office of Manager and am the authorized representative of Crystal Insurance Company, Inc. I am duly authorized by said organization to execute this statement.

Crystal Insurance Company, Inc., has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."

AnnaNguyen
Affiant

SWORN TO AND SUBSCRIBED before me on May 20, 2026.

(NOTARY SEAL)

NOTARY PUBLIC STATE OF TEXAS
ASHLEY ALEXIS MARRUFO
Notary ID #132402256
My Commission Expires
March 21, 2028

Ashley Alexis Marrufo
Signature of Notary Public

Ashley Alexis Marrufo
Printed Name of Notary Public