

No. 2026-9969

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

Date: 06/11/2026

Subject Considered:

Roberto Villanueva Limonggi
Cedar Park, Texas

Default Order
TDI Enforcement File No. 36010

General remarks and official action taken:

This is a default order taken against Roberto Villanueva Limonggi (Respondent) because evidence shows that he cheated on his licensing exam to obtain an insurance license. Respondent did not respond to a Notice of Allegations mailed 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 Allegations

1. On April 7, 2026, the department sent a Notice of Allegations, attached as Exhibit A, to Respondent.
2. The department sent the Notice of Allegations to Respondent's last known address provided in writing to the department, [REDACTED], Cedar Park, Texas 78613. The department also sent the Notice of Allegations to Respondent's electronic mail address he last designated for receipt of official department communications, [REDACTED].

3. The department gave Respondent notice and opportunity for a hearing, which Respondent waived by failing to send a written response to the Notice of Allegations within 20 days after the date it was mailed.
4. The department's factual allegations set out in the attached Notice of Allegations are incorporated in this order as findings of fact.

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 4054.051, and TEX. GOV'T CODE §§ 2001.003(1) and 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.
3. The department provided proper notice to Respondent under TEX. GOV'T CODE §§ 2001.003(1), 2001.051, 2001.052, 2001.054, and 2001.056(4), and 28 TEX. ADMIN. CODE §§ 1.1302, 1.28, 1.47, and 19.906.
4. Based on Respondent's failure to send the department a written response to the Notice of Allegations, the department is entitled to disposition by default under 28 TEX. ADMIN. CODE § 1.47.
5. Respondent failed to show compliance with the law.
6. The department's factual and legal allegations set out in the attached Notice of Allegations are incorporated in this order and deemed admitted as true under 28 TEX. ADMIN. CODE § 1.47.

Order

It is ordered that any licenses held by Roberto Villanueva Limonggi 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:

Amanda Crawford

FE10434BC41A470...

Amanda Crawford

Commissioner of Insurance

2026-9969

Commissioner's Order

Roberto Villanueva Limonggi

Page 3 of 4

Prepared and reviewed by:

A handwritten signature in cursive script, reading "Ginger R. Loeffler". The signature is written in dark ink and is positioned above a horizontal line.

Ginger R. Loeffler

Litigation Director, Enforcement

Affidavit

STATE OF TEXAS §

§

COUNTY OF TRAVIS §

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

"My name is Jackie Gonzales 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 Roberto Villanueva Limonggi. I have confirmed:

- a. The last mailing address provided to the department in writing by Roberto Villanueva Limonggi is [REDACTED] Cedar Park, Texas 78613.
- b. The file maintained by Enforcement contains a Notice of Allegations dated April 7, 2026, which was sent to Roberto Villanueva Limonggi.
- c. On April 7, 2026, the Notice of Allegations addressed to Roberto Villanueva Limonggi was mailed first-class and certified, return receipt requested, to his last known address and his electronic mail address he last designated for receipt of official department communications, [REDACTED].

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

Signed by:

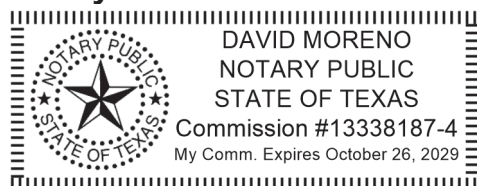
Jackie Gonzales

26C74658BEB544B...

Affiant

SWORN TO AND SUBSCRIBED before me by means of an interactive two-way audio and video communication on 6/1/2026. This notarial act was an online notarization.

Notary Seal



Digital Certificate

Signed by:

David Moreno

455E4109E15D4CD...

Notary Public State of Texas

2026-9969



PO Box 12030 | Austin, TX 78711 | 800-578-4677 | tdi.texas.gov

April 7, 2026

Roberto Villanueva Limonggi
[REDACTED]
Cedar Park, Texas 78613

Via CM/RRR No.
9214 8901 9403 8365 6378 99

TDI ENFORCEMENT CASE NO. 36010
NOTICE OF ALLEGATIONS AGAINST ROBERTO VILLANUEVA LIMONGGI

The Texas Department of Insurance (TDI) seeks to take disciplinary action against you. This Notice states the allegations against you and the relief sought by TDI.

YOUR WRITTEN RESPONSE IS REQUIRED WITHIN 20 DAYS

YOU HAVE THE RIGHT TO A HEARING AND ARE INVITED TO SHOW COMPLIANCE WITH THE LAW. To request a hearing, you must send a written response to TDI within 20 days of the date this Notice was mailed.

If you fail to send a written response by the deadline, *you waive your right to a hearing*, and TDI may seek disposition by default under 28 TEX. ADMIN. CODE § 1.47, TEX. INS. CODE § 82.055, and TEX. GOV'T. CODE § 2001.056.

If you fail to send a written response by the deadline, without further notice to you, the commissioner of insurance may issue a default order that admits the factual matters asserted, deems all allegations as true, and orders the relief recommended in this Notice.

You must send your written response by mail, fax, or email to:

Ginger Loeffler, Litigation Director
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 490-1020 (Fax)
Ginger.Loeffler@tdi.texas.gov

EXHIBIT

A

Jurisdiction

The commissioner of insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 4001.002, 4005.101, 4005.102, and 4054.051, and TEX. GOV'T CODE §§ 2001.003(1) and 2001.051–2001.178.

Factual Allegations

Licensure

1. Roberto Villanueva Limonggi, (Limonggi), individual identification number 2862727, holds a general lines agent license with a life, accident, and health qualification, originally issued by TDI on December 14, 2023.

Examinations Background During Pandemic

2. TDI has contracted with Pearson Vue, a corporation specializing in the administration of licensing and credentialing examinations, to administer the department's written examinations for professional licensure in the business of insurance. Pearson Vue normally administers testing at in-person testing sites, which Pearson Vue maintains directly or contracts with third parties to use their testing sites for in-person examinations.
3. Pearson Vue provides all individuals who take a professional licensing examination with written procedures detailing the specific conduct that is prohibited during the examination.
4. For an examinee to take an exam administered by Pearson Vue, the examinee must agree to follow Pearson Vue's written procedures. If an examinee does not agree to follow Pearson Vue's written procedures, he or she is not permitted to take an examination.
5. In response to the COVID-19 pandemic, Pearson Vue initiated its OnVue Program (OnVue), which permitted examinees to take the written examination at a remote location of their choice, apart from an in-person testing center. Examinees were permitted to take exams through OnVue only in English.
6. Calendar year 2023 was the last full year Pearson Vue administered OnVue exams before terminating online testing in 2024.

7. In 2023, for exams where the examinee completed at least 75% of the questions on the English language exam at an in-person testing center, examinees completed the exams in, on average:
 - 100.2 minutes for the Texas General Lines Life, Accident, and Health Exam;
 - 99.2 minutes for the Texas General Lines Property and Casualty Exam;
 - 70.9 minutes for the Texas Life Agent Exam; and
 - 74.3 minutes for the Texas Personal Lines Property and Casualty Exam.
8. In 2023, for exams where the examinee completed at least 75% of the questions on the English language exam at an in-person testing center, only five percent of examinees completed the exam in, on average:
 - 53.6 minutes or less for the Texas General Lines Life, Accident, and Health Exam;
 - 54.9 minutes or less for the Texas General Lines Property and Casualty Exam;
 - 35.7 minutes or less for the Texas Life Agent Exam; and
 - 40.7 minutes or less for the Texas Personal Lines Property and Casualty Exam.

Examinees whose time falls in this category are considered empirically fast because 95% of examinees used more time to complete the same exams.

Exam Cheating

9. On December 10, 2023, Limonggi took the Texas General Lines Life, Accident, and Health Exam using OnVue. Limonggi completed the examination in 11 minutes and received a passing score.
10. Limonggi completed and passed the examination in 11 minutes using OnVue, despite the average time to complete the same examination at an in-person testing center being 100.2 minutes. Limonggi's time is considered empirically fast because 95% of examinees used more time to complete the same exam.
11. Limonggi was one of 119 examinees who took their tests on the same physical computer, identified as DESKTOP-FL9C4J1. The majority of these examinees also used the same external IP address, indicating they were taken on the same network or in the same general area.

12. TDI's investigation revealed that Limonggi more likely than not cheated on the licensing examination to obtain an insurance license.

Legal Allegations

1. Limonggi willfully violated an insurance law of this state, in violation of TEX. INS. CODE § 4005.101(b)(1).
2. Limonggi intentionally made a material misstatement in the license application, in violation of TEX. INS. CODE § 4005.101(b)(2).
3. Limonggi obtained a license by fraud or misrepresentation, in violation of TEX. INS. CODE § 4005.101(b)(3).
4. Limonggi engaged in fraudulent or dishonest acts or practices, in violation of TEX. INS. CODE § 4005.101(b)(5).

Relief Sought

TDI seeks the following relief:

1. revocation of your license; and
2. imposition of any other just and appropriate relief to which the department may be entitled to by law, including any combination of the above actions.

Respectfully,



Ginger Loeffler
State Bar No. 24043871
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030
Austin, Texas 78711-2030
(512) 676-6350 (Direct)

2026-9969

Notice of Allegations
Roberto Villanueva Limonggi
Page 5 of 5

(512) 490-1020 (Fax)
Ginger.Loeffler@tdi.texas.gov

cc: Leah Gillum, Deputy Commissioner, Fraud and Enforcement Division, MC: ENF
Paul Gonzalez, Investigator, Enforcement, MC: ENF
Administrative Review, MC: CO-AAL

CERTIFICATE OF SERVICE

I, Ginger Loeffler, certify that a true and correct copy of this *Notice of Allegations Against Roberto Villanueva Limonggi* was sent by the following methods on this 7th day of April, 2026 to:

Roberto Villanueva Limonggi
[REDACTED]
Cedar Park, Texas 78613

Via CM/RRR No.:
9214 8901 9403 8365 6378 99
Via First Class Mail
Via Email: [REDACTED]

Respondent Pro Se



Ginger Loeffler



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: 04/07/2026

Shipped From:

Name: ENF M RUIZ

Address: 1601 CONGRESS AVENUE

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

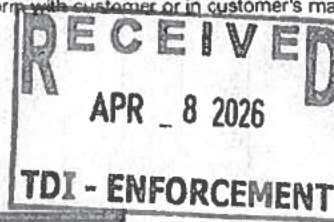
*Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

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 0069 7091 58

Ginger/36010

EXHIBIT

B

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TDI ENFORC N

Office
L. J. ...

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