

No. 2025-9412

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

Date: 07/11/2025

Subject Considered:

Trenton Avant, Sr.
Pontiac, Michigan

Default Order
TDI Enforcement File No. 33869

General remarks and official action taken:

The subject of this default order is whether a resident adjuster all-lines license should be issued to Trenton Avant Sr. (Respondent). Respondent did not respond to a Notice of Allegations mailed by the Texas Department of Insurance. This order denies Respondent's license application.

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

Findings of Fact

Failure to Respond to Notice of Allegations

1. On May 28, 2025, 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 mailing address provided in writing to the department, [REDACTED] Pontiac, MI 48341, and to an additional address, [REDACTED], Katy, TX 77493.
3. Respondent received and waived an opportunity for a hearing because Respondent failed to send the department a written response to the Notice of Allegations within 20 days after the date the Notice of Allegations was mailed.

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Commissioner's Order

Trenton Avant Sr.

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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, 4005.101, 4005.102, 4101.004, 4101.005, 4101.051, 4101.053, and 4101.201; 28 TEX. ADMIN. CODE § 1.502; TEX. OCC. CODE §§ 53.021-53.023; 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 §§ 1.28, and 1.47.
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.

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Commissioner's Order

Trenton Avant Sr.

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Order

It is ordered that Trenton Avant Sr.'s application is denied. 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:

FC5D7EDDFFB4F8

Cassie Brown
Commissioner of Insurance

Prepared and reviewed by:

Casey Dick
Casey Dick, Staff Attorney
Enforcement

Affidavit

STATE OF TEXAS §
 §
COUNTY OF TRAVIS §

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

"My name is Daniel Mireles 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 Trenton Avant Sr. I have confirmed that:

- a. The last mailing address provided to the department in writing by Trenton Avant Sr. is [REDACTED] Pontiac, MI 48341.
- b. The file maintained by Enforcement contains a Notice of Allegations dated May 28, 2025, which was sent to Trenton Avant Sr.
- c. On May 28, 2025, the Notice of Allegations addressed to Trenton Avant Sr. was mailed first-class and certified, return receipt requested, to his last known address and to an additional address, [REDACTED] Katy, TX 77493.

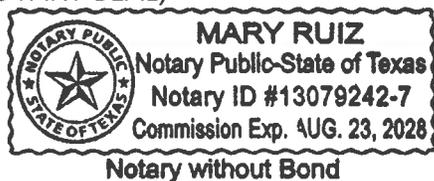
Copies of the first-class mail log and certified mail log maintained by Enforcement are attached as Exhibit B and Exhibit C, respectively."

Daniel Mireles

Affiant

SWORN TO AND SUBSCRIBED before me on June 30, 2025.

(NOTARY SEAL)



Mary Ruiz
Signature of Notary Public

Mary Ruiz
Printed Name of Notary Public

2025-9412



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

May 28, 2025

Trenton Avant Sr.
[REDACTED]
Pontiac, MI 48341

Via CM/RRR No.9214 8901 9403 8316 0117 61
Via First Class Mail
Via Email:
[REDACTED]

Trenton Avant Sr.
[REDACTED]
Katy, TX 77493

Via CM/RRR No.9214 8901 9403 8316 0119 21
Via First Class Mail

**TDI ENFORCEMENT CASE NO. 33869
NOTICE OF ALLEGATIONS AGAINST TRENTON AVANT SR.**

The Texas Department of Insurance (TDI) seeks to deny your license application. 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:

Casey Dick, Staff Attorney
Texas Department of Insurance
Enforcement, MC ENF
P.O. Box 12030



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Notice of Allegations

Trenton Avant Sr.

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Austin, Texas 78711-2030
(512) 490-1020 (Fax)
casey.dick@tdi.texas.gov

Jurisdiction

The commissioner of insurance has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 4001.002, 4005.101, 4005.102, 4101.004, 4101.005, 4101.051, 4101.053, and 4101.201; 28 TEX. ADMIN. CODE § 1.502; TEX. OCC. CODE §§ 53.021-53.023; and TEX. GOV'T CODE §§ 2001.003(1) and 2001.051–2001.178.

Factual Allegations

License Application

1. On November 19, 2023, Trenton Avant Sr. (Avant) submitted an application to TDI for a resident adjuster all-lines license.
2. On January 18, 2024, TDI proposed to deny Avant's application based on his criminal history. Avant made a written request for a hearing to appeal that decision.

Not Qualified for Resident License

3. In his license application, Avant claimed Texas residency - designating his residential address as: [REDACTED], Katy, Texas 77493. However, Avant designated his mailing address as: [REDACTED], Pontiac, Michigan 48341.
4. Because Avant designated addresses in two different states, on February 18, 2025, TDI requested Avant provide copies of his current driver's license and utilities bills in his name and at his designated residential address for the last three consecutive months. This request was sent to Avant at his designated email address in his license application, and by first class and certified mail to his designated residential and mailing addresses.
5. Avant did not reply to TDI's request.

6. Public criminal court records show Avant resides in Michigan.
7. Avant is actually a resident of Michigan and not Texas and therefore is not qualified to hold a Texas resident adjuster license.

Criminal History

Three Felony Convictions and Probation Revocation

8. On January 14, 2010, in case number 00-229617-FH in the State of Michigan 6th Judicial Court, County of Oakland, Avant pleaded guilty to three felonies for which he was later convicted of on April 22, 2010:
 - a. count 1, controlled substance delivery/manufacture less than 50 grams (narcotics/cocaine); and,
 - b. counts 2 and 3, controlled substance delivery/manufacture (marijuana).
9. Avant was sentenced in case number 00-229617-FH to the following:
 - a. for count 1, concurrently serve 180 days in jail with credit for three days served, and two years probation;
 - b. for counts 2 and 3, concurrently serve three days in jail with credit for three days served, and two years probation;
 - c. pay \$1,731.14 in restitution, a \$60 victim rights fund assessment, \$240 in supervision fees, \$600 in court costs, and \$204 in attorneys fees for state minimum costs;
 - d. imposition of a licensing sanction reportable to the Michigan State Police, specifically, his driver's license was suspended for six months; and,
 - e. several probationary terms, including performing 100 hours of community service, submitting to drug testing, and participation in substance abuse treatment.
10. Later, on March 14, 2014, in case number 09-229617-FH, the court found that Avant had not successfully completed his probation and revoked his probation. For each count, Avant was sentenced to 180 days in jail, with credit for 55 days served. He was also ordered to participate in a Life & Employment Skills program, and to pay court costs and fees pursuant to statute.

Seven Felony Convictions and One High Court Misdemeanor

11. On May 26, 2021, in case number 20-275317-FH in the State of Michigan, 6th Judicial Circuit, County of Oakland, Avant pleaded guilty to seven felonies and one high court misdemeanor, which he was later convicted of on October 19, 2021, specifically:
 - a. felony counts 1 and 3, delivery or manufacturing of a controlled substance, less than 50 grams (cocaine);
 - b. felony count 5, felon¹ in possession of a firearm;
 - c. high court misdemeanor count 7, controlled substances - maintaining a drug house; and,
 - d. felony counts 9, 10, 11, and 12 – weapons felony firearm (possession of a firearm while committing or attempting to commit a felony).
12. The remaining counts in case number 20-275317-FH were dismissed.
13. The circuit court enhanced sentencing under Michigan law, prohibited Avant from serving his time in a special alternative incarceration unit, and sentenced him for counts 9, 10, 11, and 12 to the custody of the Michigan Department of Corrections for two years minimum and maximum.
14. The circuit court further ordered him to pay \$544 for state minimum costs, a \$130 assessment to the crime victim rights fund, any court appointed attorney fees, a \$2,000 fine to the Oakland County Reimbursement, and a \$500 fine per count on counts 1, 3, 5, and 7. The sentencing order states counts 1, 3, 5, and 7 are concurrent to each other, counts 9, 10, 11, and 12 are concurrent to each other, and counts 1, 3, 5, and 7 are consecutive to counts 9, 10, 11, and 12.
15. On October 15, 2023, Avant was discharged from prison in case number 20-275317-FH.

¹ In a public court record, specifically the witness list of the General Information in case number 20-275317-FH, a representative of the Oakland County Circuit Court was identified as an anticipated testifying witness known to the prosecutor related to a "certified copy of conviction of carrying concealed weapon and felony firearm, case number 13-248139-FH, date of conviction on or about 6/5/14." That separate offense was disclosed by Avant to TDI, but is not being alleged or considered as a reason to deny Avant's license application, because TDI received confirmation from the Circuit Court that it is a "Non-Public Record."

Legal Allegations

1. Avant has not presented evidence satisfactory to TDI to show that he resides in Texas, as required by TEX. INS. CODE § 4101.053(a)(2)(B).
2. Avant does not meet the qualifications for a resident adjuster license and the commissioner cannot issue Avant that license under TEX. INS. CODE § 4101.053(b).
3. Avant has committed acts for which a license holder may be disciplined, and a license may be denied under TEX. INS. CODE § 4005.101, because he:
 - a. has engaged in fraudulent or dishonest acts or practices, in violation of TEX. INS. CODE § 4005.101(b)(5); and,
 - b. has been convicted of a felony, as contemplated by TEX. INS. CODE § 4005.101(b)(8).
4. Avant committed felony offenses or 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)-(f) and TEX. OCC. CODE § 53.021.
5. Avant committed offenses that TDI considers to be of such serious nature that they are of prime importance in determining fitness for licensure or authorization, as contemplated by 28 TEX. ADMIN. CODE § 1.502(f) and TEX. OCC. CODE §§ 53.021-53.023.
6. Avant committed a felony involving moral turpitude, as contemplated by 28 TEX. ADMIN. CODE § 1.502(f)(3).
7. Avant committed an offense with the essential elements of a weapons offense, as described by Penal Code Chapter 46, as contemplated by 28 TEX. ADMIN. CODE § 1.502(f)(4)(Q).
8. Avant committed an offense with the essential elements of an offense relating to the manufacture, delivery, or possession with intent to manufacture or deliver, a controlled substance, a simulated controlled substance, a dangerous drug, or a volatile chemical, as contemplated by 28 TEX. ADMIN. CODE § 1.502(f)(4)(T).

9. TDI guidelines, 28 TEX. ADMIN. CODE § 1.502(c)-(f), emphasize that TDI:
 - a. considers it very important that applicants be honest, trustworthy, and reliable;
 - b. may refuse to issue an original license if TDI determines that the applicant has committed a felony or misdemeanor or has engaged in fraudulent or dishonest activity that directly relates to the duties and responsibilities of the licensed occupation;
 - c. considers any felony involving moral turpitude to be of such a serious nature that it is of prime importance when determining fitness for licensure;
 - d. considers any offense with the essential elements of an offense relating to a weapons offense to be of such a serious nature that it is of prime importance when determining fitness for licensure; and,
 - e. considers any offense with the essential elements of an offense relating to the manufacture, delivery, or possession with intent to manufacture or deliver, a controlled substance, a simulated controlled substance, a dangerous drug, or a volatile chemical, to be of such a serious nature that it is of prime importance when determining fitness for licensure.

Relief Sought

TDI seeks the following relief:

1. denial of your license application; 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.

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Notice of Allegations

Trenton Avant Sr.

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Respectfully,

Casey Dick

Casey Dick

State Bar No. 24132039

Texas Department of Insurance

Enforcement, MC ENF

P.O. Box 12030

Austin, Texas 78711-2030

(512) 676-6328 (Direct)

(512) 490-1020 (Fax)

Casey.Dick@tdi.texas.gov

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

CERTIFICATE OF SERVICE

I, Casey Dick, certify that a true and correct copy of this *Notice of Allegations Against Trenton Avant Sr.* was sent by the following methods on this 28th day of May, 2025 to:

Trenton Avant Sr.

[REDACTED]

Pontiac, MI 48341

Via CM/RRR No.9214 8901 9403 8316 0117 61

Via First Class Mail

Via Email: [REDACTED]

Trenton Avant Sr.

[REDACTED]

Katy, TX 77493

Via CM/RRR No.9214 8901 9403 8316 0119 21

Via First Class Mail

Casey Dick

Casey Dick

2025-9412



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: 05/28/2025

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	2
Total	2

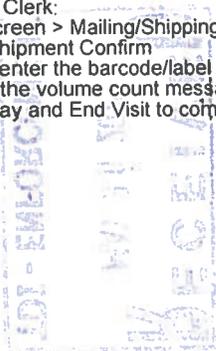
*Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

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.



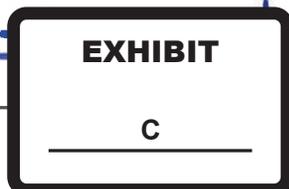
USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0061 7698 15



Casey/33869





Firm Mailing Book For Accountable Mail

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 8316 0117 61

Casey/33869

2. 9214 8901 9403 8316 0119 21

TRENTON AVANT SR

PONTIAC, MI 48341

TRENTON AVANT SR

KATY, TX 77493

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

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
0.97	4.85								2.62			
0.97	4.85								2.62			

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Total Number of Pieces Received at Post Office

2

Postmaster, Per (Name of receiving employee)

MD

PS Form 3877, January 2017 (Page 1 of 1)

Complete in Ink

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