

No. 2026-9747

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

Date: 01/21/2026

Subject Considered:

Surevestor, Inc
1880 Alta Vista Dr.
Roseville, MN 55113

Consent Order
TDI Enforcement File No. 35680

General remarks and official action taken:

This is a consent order with Surevestor, Inc (Surevestor). For six years prior to surrendering its license, Surevestor failed to maintain its license qualifications by never holding an active appointment with any insurer in Texas. During that time, Surevestor failed to make a diligent effort to seek quotes or apply for the full amount of insurance in the admitted market before making referrals of surplus lines business to a surplus lines agent to complete the surplus lines transaction. Surevestor also used misleading advertisements suggesting that unlicensed persons may collect consideration for insurance without holding a license and continued to advertise and solicit insurance in Texas after surrendering its license. Surevestor has submitted two new license applications. This order grants Surevestor those licenses, but suspends them for one year, with the suspensions probated, and subjects Surevestor to a compliance plan and the terms and conditions stated in this order. Surevestor also agrees to pay an administrative penalty of \$55,000.

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Waiver

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

Findings of Fact

Prior Licensure

1. Under firm identification number 141166, Surevestor previously held a resident general lines agent license with a property and casualty qualification with TDI for a period of six years, from June 21, 2018, until June 25, 2024, when Surevestor voluntarily surrendered its license.
2. TDI was investigating Surevestor at the time it voluntarily surrendered its previous license.

Failure to Maintain Qualifications for Prior License

3. TDI's records show that during the six years Surevestor was previously licensed with TDI, it never held any active appointment with any insurer in Texas.
4. During that six year period, Surevestor was not actively engaged in soliciting or writing admitted insurance products for the general public in Texas, and therefore failed to maintain its qualifications for licensure.

Solicitation and Advertising Surplus Lines Insurance

5. Under Texas law, an eligible surplus lines insurer may provide surplus lines insurance only if, after a diligent effort, the full amount of required insurance cannot be obtained from an admitted insurer.
6. Under TEX. INS. CODE § 981.202, only a surplus lines agent may issue or cause to be issued an insurance contract with an eligible surplus lines insurer.
7. Under 28 TEX. ADMIN. CODE § 15.101(a)(2), a general lines agent with a property and casualty qualification is not required to hold a surplus lines agent license when performing the following acts - negotiating, soliciting, effecting, procuring, or

binding surplus lines insurance contracts for clients, or offering advice, counsel, opinions, or explanations of surplus lines insurance products to agents or clients beyond the scope of underwriting policies or contracts - if that general lines agent is making a referral of surplus lines business to a surplus lines agent that then negotiates, solicits, effects, procures, or binds the surplus lines transaction.

8. Although Texas law allows a general lines agent to solicit surplus lines insurance business, it does not expressly allow a general lines agent - without holding a surplus lines agent license - to advertise surplus lines insurance products, advertise specific surplus lines policy terms or conditions, or to advertise that it can act directly on behalf of a named surplus lines insurer.

Lack of Diligent Effort

9. According to TDI's records, Surevestor has never been licensed as a surplus lines agent.
10. Instead of soliciting and writing business for admitted insurers while it was a licensed general lines agent, Surevestor solicited and advertised surplus lines insurance products on behalf of Evanston Insurance Company, an eligible surplus lines insurer and part of the Markel Group of Companies (Markel). Surevestor advertised specific insurance policy terms and conditions on its website for Markel. However, Surevestor represents that it then referred any applicants to licensed surplus lines agents.
11. Surevestor admitted to TDI that during the six years it was previously licensed, it relied solely on two unlicensed employees to perform a purported diligent effort to obtain policies for Texas risks from authorized insurers in the admitted market.
12. However, those two employees have never been licensed or otherwise authorized to engage in the business of insurance in Texas.
13. Since Surevestor and its two unlicensed employees lacked any appointments to act on behalf of any insurers in the admitted market, Surevestor could not have possibly sought any quotes, submitted any applications, or even attempted to place policies with any admitted insurer in Texas.

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14. Therefore, any purported efforts by Surevestor to obtain the full amount of required insurance for Texas risks from an insurer authorized to write and actually writing that kind of insurance in Texas, were not diligent.

Misleading Surplus Lines Advertising

15. While it was previously licensed, Surevestor advertised on its website that it offered a "master tenant liability" policy to property managers that would purportedly allow the property managers to collect consideration from tenants in connection with the property manager obtaining the liability insurance.
16. The policy Surevestor advertised is in fact a surplus lines insurance policy issued by an eligible surplus lines insurer and procured by a surplus lines agent for a TDI-registered purchasing group.
17. Surevestor's website also advertised that property managers "can charge an admin fee" and described benefits for property managers when purchasing liability policies through Surevestor, including that the insurance is "monetizable with an added admin fee."
18. In July 2024, Surevestor's website continued to solicit and advertise surplus lines business suggesting that property managers can collect fees and consideration for insurance from their tenants.
19. On or about January 3, 2025, Surevestor updated its website and removed "monetizable with an added admin fee" from the list of benefits for property managers. Surevestor represents it no longer markets and advertises that property managers can collect "an admin fee" from insured tenants. However, Surevestor's website continues to advertise the terms and conditions of a surplus lines insurance policy and purport that Surevestor can act on behalf of the surplus lines insurer, Markel.

False and Misleading Advertising After License Surrender

20. On July 1, 2024, after Surevestor voluntarily surrendered its resident license, TDI sent Surevestor a letter confirming the license status change and reminding Surevestor that any further insurance activity in Texas is prohibited.

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21. On July 3, 2024, Surevestor confirmed receipt of the letter, but failed to revise its website to indicate or disclose that it was no longer licensed and could solicit or write insurance in Texas.
22. On July 18, 2024, only two days after submitting its license application, Surevestor represented to TDI that it did not revise its website because it wanted "to avoid the expense of website modification."
23. After TDI made repeated requests for revision, Surevestor revised its website on July 24, 2024, to state, "New insurance policies are temporarily unavailable in Texas."
24. Four months after surrendering, on or about October 31, 2024, Surevestor then revised its website to state, "New clients in Texas will have policies temporarily serviced by an associated broker."
25. On or about January 3, 2025, Surevestor finally revised its website to state that it "does not currently hold a license in Texas. New or renewing clients in Texas will have policies serviced by an associated agency."
26. Because Surevestor had no license after it surrendered, and also had no appointments prior to the surrender, Surevestor could not have serviced any policies or clients whatsoever, regardless of whether they constituted new or renewal business. Surevestor's website representations following its license surrender constitute false, misleading, and deceptive advertising.

License Applications

27. The records of the Delaware Department of Insurance show that Surevestor presently holds an active producer license in its designated home state of Delaware effective January 1, 2024. Those records also show that Surevestor held a surplus lines license in Delaware that expired on February 29, 2020, and was re-activated on August 26, 2025.
28. On July 16, 2024, Surevestor submitted an application to TDI for a non-resident general lines agent license with a property and casualty qualification, application ID number 3323152. Surevestor represents that it surrendered its Texas resident license a month earlier in order to effectuate a change of domicile.

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29. In its general lines license application, Surevestor identified James L. Harvin, III (Harvin), individual identification number 501823, as its designated responsible licensed person (DRLP). Harvin is a resident of Michigan and holds the following non-resident agent licenses with TDI:
 - a. a general lines license with both life, accident, health and HMO, and property and casualty qualifications, originally effective from July 15, 2002, until July 15, 2006, when it expired due to a failure to renew, and which license and qualifications were respectively reactivated on December 12, 2017, and December 14, 2016; and,
 - b. a life agent license issued September 15, 2017.
30. TDI proposed to deny Surevestor's general lines license application on September 17, 2024. Surevestor appealed that decision and made a written request for a hearing.
31. On August 5, 2025, Harvin submitted an application to TDI for an individual non-resident surplus lines agent license.
32. Soon after, on September 4, 2025, Surevestor submitted an application to TDI for a non-resident surplus lines agent license, application ID number 3639019, and identified Harvin as its DRLP for surplus lines business.
33. In December 2025, Surevestor submitted a biographical information form FIN531 to TDI for application ID number 3639019 to remove Harvin as the DRLP for surplus lines business, and replace him with Eric Rosell Swenson, individual identification number 2828691, who holds a surplus lines license issued by TDI on November 14, 2025.
34. Both of Surevestor's license applications are being resolved through this consent order.

Mitigation

35. Surevestor represents that after surrendering its license it did not immediately update its website to state that it is not licensed in Texas because it believed that there would be no gap in licensure between surrendering its resident license and the issuance of its non-resident license.

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36. Surevestor represents that in the last five years it attempted to obtain appointments with four separate admitted insurers, but the admitted insurers declined to appoint Surevestor citing a misalignment of Surevestor's focus on specialty products in the surplus lines market and that the insurers do not underwrite or market those specialty products.
37. On January 28, 2025, Surevestor represented to TDI that it changed its proposed business plan and now intends to solicit and offer insurance covering Texas risks in the admitted market.
38. Surevestor consents and agrees that if the non-resident general lines and surplus lines licenses are granted, it will:
 - a. seek and maintain an active appointment(s) with an admitted insurer in Texas throughout the probationary period, and thereafter, will continue to comply with TEX. INS. CODE §§ 4001.104(a)(1) and 4001.201 with respect to its general lines license;
 - b. make a diligent effort to obtain the full amount of insurance from an insurer authorized to write and actually writing that kind and class of insurance in Texas before making a referral of surplus lines business to a surplus lines agent that completes the transaction, and before placing business with an eligible surplus lines insurer; and,
 - c. cease and desist from advertising or otherwise informing unlicensed individuals or entities that they may collect any fees or other valuable consideration from an insured in connection with an insurance policy.

Conclusions of Law

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 981.004, 981.202, 4001.002, 4001.104, 4001.106, 4001.201, 4001.254, 4005.101, 4005.102, 4005.107, 4051.051, 4056.052, and 4056.054.
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.

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3. Surevestor 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. Surevestor violated TEX. INS. CODE §§ 981.202 and 4001.051(b)(3) and 28 TEX. ADMIN. CODE § 15.101(a)(2), by advertising the terms and conditions of a surplus lines insurance policy, and advertising that it can act as an agent on behalf of an eligible surplus lines insurer, without holding a surplus lines license to do so in Texas.
5. Surevestor violated 28 TEX. ADMIN. CODE §§ 21.103(a), (b), and (d) and 21.112 by issuing false, misleading, and deceptive advertisements.
6. Surevestor violated TEX. INS. CODE § 981.004(a)(1)-(2) by failing to make a diligent effort to obtain the full amount of required insurance from an insurer authorized to write and actually writing that kind and class of insurance in this state, before making a referral of surplus lines business to a surplus lines agent that completes the transaction, as contemplated by 28 TEX. ADMIN. CODE § 15.101(a)(2).
7. Surevestor violated TEX. INS. CODE §§ 4001.201 and 4001.254 for six years by failing to hold an active appointment to act as an agent before engaging in the business of insurance and failing to maintain the qualifications required for its previous general lines license.

Order

It is ordered that a non-resident general lines agent license with a property and casualty qualification and a non-resident surplus lines agent license are granted to Surevestor. It is further ordered that both of these licenses are also suspended for one year, with the suspensions probated to the terms and conditions stated in this order.

If, during the probation period imposed by this order, TDI issues any additional licenses or authorizations to Surevestor, those additional licenses or authorizations will be suspended until the probation period imposed by this order has ended. The suspension shall be probated and the same terms and conditions stated in this order will apply.

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It is further ordered that Surevestor must comply with the following compliance plan:

1. Not later than 90 days after the date of this order, Surevestor must obtain an active appointment from an admitted insurer in Texas.
2. During the probation period, Surevestor must maintain an active appointment with an admitted insurer at all times.
3. The failure to timely obtain an active appointment or to maintain an active appointment throughout the probationary period will constitute a violation of this order.
4. While holding its general lines agent license and any other license issued under Insurance Code Title 13, Surevestor must comply with TEX. INS. CODE §§ 4001.104(a)(1) and 4001.201.
5. Surevestor must make a diligent effort to write the full amount of required insurance from an insurer authorized to write and actually writing that kind and class of insurance in this state, before making any referral of surplus lines business to a licensed surplus lines agent that then completes the surplus lines transaction, and before placing business with an eligible surplus lines insurer, as required and contemplated by TEX. INS. CODE § 981.004 and 28 TEX. ADMIN. CODE § 15.101(a)(2).
6. Surevestor must immediately cease and desist from advertising that any unlicensed persons or employees may perform the acts of an agent or any other action constituting the business of insurance in Texas, including, but not limited to, advertisements that unlicensed persons may collect a fee or other valuable consideration for insurance.

Beginning from the date of this order and continuing through the probation period, Surevestor must submit a quarterly, written report to TDI by emailing it to EnforcementReports@tdi.texas.gov. Each report is due 90, 181, 273, and 365 days after the date of this order. The reports must include the following information:

1. the full name and Texas license number of each employee who ensures Surevestor's compliance with the diligent effort requirement in TEX. INS. CODE § 981.004(a)(1)-(2);

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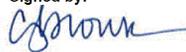
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2. the name, address, and contact number of any insurer which has newly appointed Surevestor within the prior quarter; and,
3. the name, address, and contact number of any insurer which has canceled any of Surevestor's appointment(s), and a brief description of the reason for that cancellation, if known.

Surevestor must notify the department immediately of the following by emailing EnforcementReports@tdi.texas.gov:

1. any charges or indictments filed against any officer, director, owner, or other controlling person of Surevestor, for a misdemeanor or felony during the period Surevestor is required to file reports, excluding traffic offenses and Class C misdemeanors; and
2. any state or regulatory actions taken against Surevestor, its officers, directors, owners, shareholders, or any controlling persons, including formal and informal actions.

It is further ordered that Surevestor pay an administrative penalty of \$55,000 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:


FC5D7EDDFB4F8...

Cassie Brown

Commissioner of Insurance

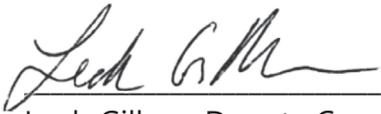
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Recommended and reviewed by:



Leah Gillum, Deputy Commissioner
Fraud and Enforcement Division



Anna Kalapach, Staff Attorney
Enforcement

Affidavit

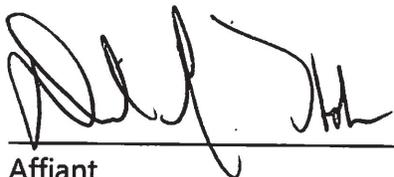
STATE OF MINNESOTA §
§
COUNTY OF RAMSLEY §

Before me, the undersigned authority, personally appeared DAVID G. HOLT, who being by me duly sworn, deposed as follows:

"My name is DAVID G. HOLT. 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 PRESIDENT and am the authorized representative of Surevestor, Inc. I am duly authorized by said organization to execute this statement.

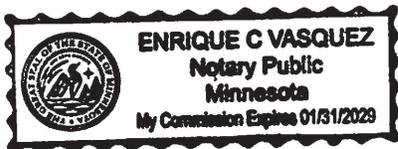
Surevestor, Inc, has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."

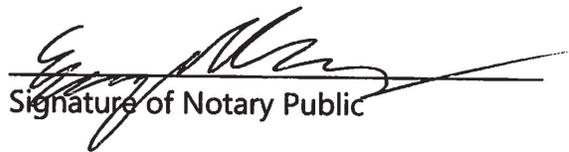


Affiant

SWORN TO AND SUBSCRIBED before me on December 11th, 2025.

(NOTARY SEAL)





Signature of Notary Public
Enrique C Vasquez

Printed Name of Notary Public