

No. 2021-7087

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

**Date: 11/18/2021**

**Subjects Considered:**

T Rock Roofing & Contracting LLC [REDACTED]

[REDACTED]  
Texas 75243

Aaron Sadler  
[REDACTED]

Dallas, Texas 75243

Consent Order  
SOAH Docket No. 454-20-4104.C  
TDI Enforcement File Nos. 10885 & 22106

**General remarks and official action taken:**

This is a consent order with T Rock Roofing & Contracting (T Rock) and Aaron Sadler (Sadler) (referred to collectively as Respondents). The department alleges that T Rock, a roofing company, and Sadler, the company's owner, acted and/or advertised as a public insurance adjuster without a license. Respondents have agreed to cease and desist from performing the acts of a public insurance adjuster or otherwise engaging in acts that constitute the business of insurance in Texas. Respondents further agree to pay, jointly and severally, a \$6,500 administrative penalty.

**Waiver**

Respondents acknowledge that the Texas Insurance Code and other applicable law provide certain rights. Respondents waive all of those rights, and any other applicable procedural rights, in consideration of the entry of this consent order.

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## Findings of Fact

### Roofing and Construction Contractor

1. T Rock is a roofing and construction business owned by Sadler and located at [REDACTED] [REDACTED] Dallas, Texas 75243. T Rock has several additional locations in Texas.
2. T Rock does business under the name T Rock Roofing & Construction.
3. Neither T Rock, Sadler, nor any employee of T Rock hold a public insurance adjuster license.

### Unauthorized Practice of Public Insurance Adjusting

4. The department received a complaint that T Rock was acting as a public insurance adjuster. T Rock's website advertises public insurance adjuster services and that it is licensed by the department when in fact, T Rock is not licensed by the department.
5. The department discovered multiple statements and/or advertisements in violation of Texas insurance laws on T Rock's website, including:
  - a. "Our Services – Our services are designed with you in mind. Do you have storm damage and dread the hassle of filing a claim? We will handle the process with your insurance company from beginning to end. We contract with licensed adjusters to meet with your insurance representative when assessing the extent of the damage to your property."
  - b. "Professional Achievements & Qualifications" includes a "Public Insurance Adjusters License."
  - c. "[W]e will send a licensed adjuster to meet with the representative from the insurance company when assessing the extent of the storm damage. This ensures that you receive compensation for all of the repairs needed up front."
  - d. "If you have already begun a claim, we may be able to increase the amount of your settlement."
  - e. "[W]e do our best work with – not against – your insurance provider."

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- f. "T Rock has licensed adjusters that work for us. We know and work with the same adjuster every day. They prepare the detailed Exactimate report precisely the way the insurance company wants to see it."
    - g. "We will handle the process with your insurance company from beginning to end."
6. The department requested T Rock and Sadler revise these statements and come into compliance with Texas insurance laws. While they made some revisions, the website still contained problematic statements and advertisements, including:
  - a. An entire page under "Insurance Claims" was devoted to discussing the insurance claims process.
  - b. The site answered questions about the insurance process under "Claims Process FAQs."
  - c. Further, the website stated:
    - i. "[D]ealing with claims department can often be a larger hassle than the repair process itself. Fortunately, with us you won't have to endure that tedious process. Contact T Rock Roofing and Construction first, and we will send a tenured construction specialist to meet with the representative from the insurance company when assessing the extent of the storm damage. This ensures that you receive compensation for all the repairs needed up front."
    - ii. "[W]e aim to work with – not against – your insurance provider."
    - iii. "Many insurance adjusters will calculate less expensive repairs[.]"
    - iv. "How much will this cost me? Most insured home owners pay nothing and It WILL NOT raise your premiums. Call us for a 15 minute appointment and let us explain how. We show you step by step."
    - v. "Will I Have to Miss Any Work? No. We are happy to meet with your insurance adjuster on your behalf and represent your best interest; we always welcome you to be there if you like. We work around your schedule and can meet nearly any time, day or night."

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- d. "The claim process may take anywhere between two days up to six months to complete depending on many factors. Ask your contractor for more details regarding your specific project."
7. The department subsequently requested again that T Rock and Sadler revise the website's statements and advertisements and come into compliance with Texas insurance laws. However, the department continued to observe multiple problematic statements and advertisements on T Rock's website, including:
  - a. "Although property owners are grateful they have insurance coverage when a storm hits, dealing with claims department can often be a larger hassle than the repair process itself. Fortunately, you may not have to. Contact T-Rock Roofing and Construction first, and we will send a tenured construction specialist to meet with the representative from the insurance company when assessing the extent of the storm damage. This ensures that you receive compensation for all of the repairs needed up front. Even if you have already begun a claim, we will be able to provide a code compliant, full comprehensive scope of work. In doing so, we do our best to work with – not against – your insurance provider."
  - b. "If we determine the damage is severe enough, we will recommend you file a claim with your insurance provider."
  - c. "Factor #1: Licensed Adjusters  
  
Most roofers do not understand how to prepare your roof damage claim using Exactimate (the standard software for creating property claim estimates). Insurance companies want a licensed adjuster to help with the reporting side, not a roofer. Tip: T Rock works with tenured construction specialists who will be able to provide a code compliant, full comprehensive scope of work."
8. On or about January 2019, a client posted a review of T Rock on the internet which stated ". . . they even advocating for me as we dealt with my own insurance." (errors in original)
9. On November 7, 2019, T Rock Roofing replied to a customer review on its Facebook page that stated "[h]e was prompt and responsive in the meetings with the insurer[.]"

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10. On January 17, 2020, T Rock Roofing stated on its Facebook page, “[d]on’t waste your time dealing with insurance claims departments on your own.”
11. On or about January 2020, several clients posted a review of T Rock on the internet. These reviews included the following statements:
  - a. “. . .goes the extra mile to negotiate with insurance companies for the best reimbursement . . .”.
  - b. “He and his staff went back and forth with insurance to get the entire job handled, which saved me from potentially ending up with a settlement that wouldn’t have paid for half the job.”
  - c. “He came to my house, looked over the damage, took plenty of pictures and said he would contact the insurance adjuster himself on my behalf if I didn’t mind. The next thing I knew was the insurance adjuster advised me that I would be receiving additional funds.”
12. Respondents have now fully cooperated with the department and removed all language referencing the unauthorized practice of public insurance adjusting from their website.
13. Respondents agree to comply with all insurance laws in the future.

### Conclusions of Law

1. The commissioner has jurisdiction over this matter pursuant to TEX. INS. CODE §§ 82.051-82.055, 101.101-101.156, and Ch. 4102.
2. The commissioner has authority to dispose of this case informally pursuant to TEX. GOV’T CODE § 2001.056, TEX. INS. CODE § 82.055, and 28 TEX. ADMIN. CODE § 1.47.
3. Respondents have knowingly and voluntarily waived all procedural rights to which they 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. Respondents engaged in the unauthorized practice of public insurance adjusting, as contemplated by TEX. INS. CODE § 4102.001(3)(A)(i) when they acted on behalf of an insured in negotiating for or effecting the settlement of a claim or claims for

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loss or damage under any policy of insurance covering real or personal property, in violation of TEX. INS. CODE § 4102.051.

5. Respondents engaged in the unauthorized practice of public insurance adjusting, as contemplated by TEX. INS. CODE § 4102.001(3)(B) when they advertised, solicited business, or held themselves out to the public as an adjuster of claims for loss or damage under any policy of insurance covering real or personal property, in violation of TEX. INS. CODE § 4102.051.
6. Respondents violated TEX. INS. CODE § 4102.163(a) by acting as a public insurance adjuster or advertising to adjust claims for any property for which the contractor is providing or may provide roofing services, regardless of whether the contractor holds a license.


### **Order**

It is ordered that T Rock Roofing & Contracting d/b/a T Rock Roofing and Construction and Aaron Sadler must cease and desist immediately and in perpetuity from:

- a. performing the acts of a public insurance adjuster or otherwise engaging in acts that constitute the business of insurance in Texas;
- b. making, publishing, disseminating, circulating or placing before the public, or causing, directly or indirectly, to be made, published, disseminated, circulated, or placed before the public, in a newspaper, magazine, or other publication, or in the form of a notice, circular, pamphlet, letter or poster, or over any radio or television station, or by electronic means, on the internet, in an email or via social media, or in any other way, an advertisement, announcement or statement containing any assertion, representation or statement with respect to performing the acts of public insurance adjuster, which is untrue, deceptive, or misleading; and
- c. using language in advertisements and/or business forms describing the acts of a public insurance adjuster or any activities related to conducting the unauthorized practice of public insurance adjusting or the business of insurance in Texas.

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It is further ordered that T Rock Roofing & Contracting d/b/a T Rock Roofing and Construction and Aaron Sadler must pay, jointly and severally, an administrative penalty of \$6,500 within 30 days of 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.

DocuSigned by:  
  
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Cassie Brown  
Commissioner of Insurance

Recommended and reviewed by:

  
Leah Gillum, Deputy Commissioner  
Enforcement Division

  
Stephanie Andrews, Staff Attorney  
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Approved as to form and content:

  
John B. Diefenbach  
Counsel for Respondents







