

No. 2026-9835

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

Date: 03/10/2026

Subject Considered:

Miguel Bilbao
Dallas, Texas 75225-8021

Eagle National Insurance Services, Inc.
8117 Preston Rd. Ste 300
Dallas, Texas 75225-6347

TDI Enforcement File Nos. 37477 and 36818

Order on Motion for Rehearing

General Remarks and Official Action Taken:

The subject of this order is Miguel Bilbao's request to set aside Commissioner's Order No. 2026-9770 and allow another opportunity for a hearing. This order denies Mr. Bilbao's motion.

Background

On January 28, 2026, Commissioner's Order No. 2026-9770 was issued, revoking any licenses held by Miguel Bilbao and Eagle National Insurance Services, Inc. (the respondents) and ordering them to pay restitution to Imperial PFS Corporation in the amount of \$3,605.24. The order was issued following the failure of the respondents to respond to the notice of allegations sent by Texas Department of Insurance (TDI) Enforcement staff to the respondents under Tex. Admin. Code § 1.47.

Mr. Bilbao sent a motion for rehearing to TDI by email on February 3, 2026. TDI Enforcement staff submitted a reply to Mr. Bilbao's motion on February 12, 2026, opposing it.

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Discussion

Under 28 Tex. Admin. Code § 1.47(d)(2), a motion to set aside a default order and reopen the record will be granted if the requesting party establishes that the failure to file a written response to a notice of allegations was neither intentional nor the result of conscious indifference, and that such failure was due to a mistake or accident.

Under Government Code § 2001.146, a motion for rehearing must be filed no later than the 25th day after the date the order is signed unless an extension is granted. The motion must identify with particularity findings of fact or conclusions of law that are the subject of the complaint and any evidentiary or legal ruling claimed to be erroneous. The motion must also state the legal and factual basis for the claimed error.

Mr. Bilbao asserted that his failure to respond to the notice of allegations was not intentional because he did not become aware of it or the default order until January 29, 2026. He said that he has no prior disciplinary history, and revocation of his license would work a severe hardship on him and impact his livelihood. He sent this message from his email address of record.

TDI Enforcement staff opposed granting the motion. TDI Enforcement staff noted that two notices of allegations, an initial notice and an amended notice, were sent to Mr. Bilbao by both certified mail to his last known address provided to TDI in writing and to his email address of record. The notices of allegations clearly told him of the requirement to make a written response or risk issuance of a default order. The default order was also sent to these addresses. However, Mr. Bilao responded only once the default order was sent, and he responded from the same email address to which the notices and default order had been sent.

Mr. Bilbao provided no explanation as to how he was unaware of the notices of allegations, even though they were sent to his last mailing address provided to TDI in writing and his email address of record on file with TDI, and his communications with TDI following issuance of the default order came from the same email address to which the notices and the default order had been sent. Thus, he did not establish that his failure to file a written response to the notices of allegations was neither intentional nor the result of conscious indifference, and that such failure was due to a mistake or accident. For this reason, Mr. Bilbao's motion for rehearing should be denied.

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Order

It is ordered that Miguel Bilbao's motion for rehearing is denied and Commissioner's Order No. 2026-9770 is final.

Signed by:
Amanda Crawford
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Amanda Crawford
Commissioner of Insurance

Recommended and reviewed by:

Signed by:
Jessica Barta
5DAC5618BBC74D4...
Jessica Barta, General Counsel

Signed by:
Justin Beam
27ADF3DA5BAF4B7...
Justin Beam, Chief Clerk