In the Matter of the

***FINANCIAL INSTITUTIONS ACT*, RSBC 1996, c.141**
(the "Act")

and the

INSURANCE COUNCIL OF BRITISH COLUMBIA
("Council")

and

KEVIN NEIL AQUILARIO
(the "Licensee")

ORDER

As Council made an intended decision on April 28, 2026, pursuant to sections 231 and 241.1 of the Act; and

As Council, in accordance with section 237 of the Act, provided the Licensee with written reasons and notice of the intended decision dated June 2, 2026; and

As the Licensee has not requested a hearing of Council's intended decision within the time period provided by the Act;

Under authority of sections 231 and 241.1 of the Act, Council orders that:

1) The Licensee is fined $2,000, to be paid by October 1, 2026;

2) The Licensee is required to complete the following courses, or equivalent courses as acceptable to Council, by October 1, 2026:

    i. The Council Rules Course for General Insurance Agents, Salespersons and Adjusters; and

    ii. Ethics and the Insurance Professional course, available through the Insurance Institute of Canada

    (collectively, the "Courses")

3) The Licensee is assessed Council's investigation costs in the amount of $1,031.25, to be paid by October 1, 2026; and

4) A condition is imposed on the Licensee's general insurance licence that failure to pay the fine and investigation costs and complete the Courses by October 1, 2026, will result in the automatic suspension of the Licensee's licence and the Licensee will not be permitted to complete the Licensee's 2028 annual licence renewal until such time as the Licensee has complied with the conditions listed herein.

This order takes effect on the **2nd day of July, 2026.**

Janet Sinclair, Executive Director
Insurance Council of British Columbia

INTENDED DECISION

of the

INSURANCE COUNCIL OF BRITISH COLUMBIA
(“Council”)

Respecting

KEVIN NEIL AQUILARIO
(the “Licensee”)

1. Pursuant to section 232 of the *Financial Institutions Act* (the “Act”), Council conducted an investigation to determine whether the Licensee acted in compliance with the requirements of the Act, Council Rules and Code of Conduct relating to allegations that the Licensee issued Insurance Corporation of British Columbia (“ICBC”) Autoplan insurance policies where the renewal insurance policy was issued with a higher rate class and then reduced to a lower rate class to gain commissions.

2. On March 19, 2026, as part of Council’s investigation, a Review Committee (the “Committee”) comprised of Council members met via video conference to discuss the investigation and to allow the Licensee an opportunity to provide additional information or make further submissions. An investigation report prepared by Council staff was distributed to the Committee and the Licensee before the meeting. A discussion of the investigation report took place at the meeting, and having reviewed the investigation materials and discussed the matter, the Committee prepared a report for Council.

3. The Committee’s report, along with the aforementioned investigation report, was reviewed by Council at its April 28, 2026, meeting, where it was determined the matter should be disposed of in the manner set out below.

PROCESS

4. Pursuant to section 237 of the Act, Council must provide written notice to the Licensee of the action it intends to take under sections 231 and 241.1 of the Act before taking any such action. The Licensee may then accept Council’s decision or request a formal hearing. This intended decision operates as written notice of the action Council intends to take against the Licensee.

FACTS

5. The Licensee has held a General Salesperson Level 1 ("Level 1 Salesperson") licence since July 13, 2015. The Licensee held an authority to represent an agency (the "Agency") from July 13, 2015, until December 31, 2024. The Licensee currently holds an authority to represent a new agency.

6. On December 2, 2024, ICBC notified Council that it had investigated the practices of the Agency, [redacted] (the "Former Nominee") and the Licensee.

7. On December 18, 2024, Council's investigator met with ICBC's Senior Manager of Broker Accounts, to learn more about the ICBC investigation. ICBC's Senior Manager of Broker Accounts advised that ICBC had suspended the Former Nominee from conducting ICBC business and that a draft decision was being prepared. On December 19, 2024, Council's investigator provided ICBC with a production order for information related to its investigation.

ICBC Investigation

8. On January 6, 2025, ICBC provided various documents relating to its investigation. Within the documentation was an evidence package relating to the Agency and the Former Nominee. ICBC's report stated that an investigation was conducted into transactions between January 1, 2019, and July 1, 2024. The ICBC investigation focused on 649 policies with optional coverage placed by the Agency. The Former Nominee had completed 591 of the 649 optional coverages, of which 96.8% were removed within 7 days of the initial transactions, resulting in commissions of $126,078.42.

9. The ICBC investigation found common patterns within the transactions: the customers had not purchased ICBC optional coverage in prior years; the customers used ICBC payment plans; the optional coverages were removed from the policies, often the same day or the next day; and the signatures for the transactions did not match those of the customers. These patterns suggested that the policies were being targeted so that the broker could put through the policy or coverage using the customer's existing payment plan information, thereby earning commission on the ICBC optional coverages. Shortly after the coverage or policies were issued but before any withdrawal occurred from the customer's bank account, the Former Nominee removed the coverage and adjusted the payment plan withdrawal amount. The implicated customers may not have even been aware of the initial renewal transaction, and only saw and signed the final mid-term change transaction with the reduced bank account withdrawal paperwork. Subsequent investigations by ICBC's Special Investigations Unit ("SIU") contacted a sampling of these customers, who confirmed that they had optional insurance with private insurers and had never asked for ICBC optional coverage.

10. Additionally, there was a document package for the Licensee, in which ICBC had investigated transactions conducted by the Licensee between January 1, 2019, and September 1, 2024, involving transactions where the policy renewal and policy change occurred before the effective date. ICBC noted that the Licensee conducted rate class reductions in which policies were renewed with a higher rate class, and then a policy change was issued at a lower rate class. ICBC flagged 31 of these transactions conducted by the Licensee in the period under review. Additionally, ICBC noted that the Licensee completed 10 optional coverage removals.

11. The SIU report noted that the Agency ratio for "Short Term Cancellation" (transactions where policies are cancelled shortly after a new submission or renewal) was 1.6 times higher than the provincial average. For "Optional Coverage Removal" (transactions where core optional coverages were purchased on a submission or renewal and subsequently removed shortly after), the Agency ratio was 16.5 times higher than the provincial average.

12. As part of ICBC's SIU investigation, an interview took place on September 10, 2024, with NN, the office manager at the Agency at that time. NN stated that he noticed suspicious transactions in Autolink and *"stumbled upon the double dipping"* of commissions. He had noticed a reduction in coverage on the ICBC side, and that it was then put with Insurer X (the only private auto insurance the Agency provides) as if it were a new policy. NN stated that the Former Nominee would renew policies and then two minutes later remove the coverage. NN also noted that the Agency had failed three ICBC audits in the two years he was at the Agency. NN stated that another licensee within the Agency voiced concerns about being on probation after one of the failed ICBC audits for conducting business for the Former Nominee, and that the Former Nominee told the licensee to *"just keep doing what you are doing."* NN also expressed concerns regarding the Former Nominee's practice of renewing and cancelling policies, noting that a customer would have to sign a document indicating that they were cancelling the ICBC optional coverage, and suspected that the customers were unaware of what the Former Nominee was doing. NN stated that he *"has personally seen [the Former Nominee] forge documents"* and *"the disregard for policy and procedure [by the Former Nominee] has no bounds."*

13. On December 11, 2024, ICBC made its decision relating to its investigation of the Agency and the Former Nominee. In the decision, ICBC noted again that between January 1, 2019, and July 1, 2024, the Agency placed collision and comprehensive coverage (the Optional Coverage on 649 policies, with the Former Nominee completing 591 of these transactions), and used the customers' existing payment plans but without the knowledge of the customers. Shortly after the coverage or policies were issued but before funds were withdrawn from the customers' bank accounts, the Former Nominee removed the coverage and adjusted the payment plan withdrawal amounts, again without the knowledge of the customers. It was further noted that during the investigation of batched

documents from mid-December 2022 to September 13, 2024, the Former Nominee's transactions included owner signatures on the renewal and change documents that were noticeably different from or that did not match the original client signatures. It was further noted that none of the documents included an attached email consent from customers. In cases where there were joint policies, there is a requirement that both signatures be obtained, but in the Former Nominee's transactions, the second signature was missing. ICBC noted in its letter that the Former Nominee and Agency accepted full responsibility for the allegations set out by ICBC, except for the allegation that the Agency failed to keep relevant documents on its premises. As a result, ICBC directed the Agency to ensure that the Former Nominee ceased to have any role or authority within the Agency and that the Former Nominee not conduct any ICBC business directly or indirectly.

Council's Investigation

14. On February 6, 2025, Council's investigator received a statement from the Licensee regarding this investigation. The Licensee stated that he conducted ICBC transactions under the direction of the Former Nominee and trusted the Former Nominee's judgment as his supervisor. The Licensee did not know or understand the full extent of the Former Nominee's misconduct at that time. The Licensee acknowledged that his actions at the time were misguided but that he was following the Former Nominee's instructions.

15. On March 19, 2025, the Licensee attended an interview with Council's investigator. The Licensee stated that he obtained his Level 1 Salesperson licence in 2015 and had only worked for the Agency from when he obtained his licence to when he was terminated. The Licensee stated that he personally saw the Former Nominee conduct optional coverage transactions without customers' knowledge, as the Former Nominee explained that the clients *"trust you"* and *"you just take care of the whole account so that you have control."* The Licensee maintained that he had not conducted the optional coverage transactions but stated that he had conducted the rate class reduction transactions as flagged by ICBC. The Licensee claimed that the customers knew and consented to their policies being issued at a higher premium and rate class. The Licensee stated that the Former Nominee told him this way of processing transactions was fine because the customer could change their mind and then request a lower premium with the appropriate rate class. The Licensee claimed that he witnessed a former colleague being fired because they had not done what the Former Nominee asked, and that the Former Nominee advised employees not to follow ICBC's two-step consent process because it took too long. The Licensee stated that when he raised his concerns with KM, the co-owner of the Agency, she explained that she had a complex business partnership with the Former Nominee and that nothing came of the discussions in which he raised concerns.

16. The Former Nominee denied instructing the Licensee to complete the rate class reduction transactions.

17. Council's investigator interviewed NN on March 12, 2025. While reviewing transactions, NN noticed irregularities, particularly in ICBC Autoplan policies. NN observed a recurring pattern where, for new business, ICBC policies were initially loaded with full coverage and then cancelled or reduced before being replaced with a policy with Insurer X. For renewals, ICBC coverage was temporarily increased at renewal, then removed, and similarly replaced with coverage from Insurer X. However, NN stated that the policies placed with Insurer X were often prepared 30 to 40 days in advance. NN also stated that he personally saw the Former Nominee forge documents, and the Former Nominee's explanation to him was that *"it's just a piece of paper, it doesn't mean anything."*

18. On April 1, 2025, KM was interviewed by Council's investigator. KM stated that she had an *"inkling"* about what the Former Nominee was doing, but only became certain after walking by an employee's desk and overhearing them mention rate class changes. When KM asked about it, the employee explained that the Former Nominee was completing rate changes in this manner. KM stated that, after learning of this, she questioned NN about the rate class reduction transactions, and NN advised her that he had found double-dipping transactions involving optional coverage changes. KM stated that the Former Nominee was cultivating bad habits within the Agency. KM stated that she told the Licensee and other agents within the Agency not to follow the Former Nominee's lead, but they continued to do so because he was their boss. KM further recalled an instance where the Former Nominee instructed an agent to tell an out-of-province customer to go to another agency because serving them would take too long. KM stated that she never saw the Former Nominee complete the optional coverage transactions or forge signatures. KM was unable to provide any supporting documentation to suggest that the Agency provided any correspondence or that meetings took place within the Agency to address the Former Nominee's conduct or to provide instructions to licensees within the Agency to not conduct insurance business in this manner.

19. On May 20, 2025, the Former Nominee attended an interview with Council staff and the Former Nominee's legal counsel. The Former Nominee stated that he believed he had implied consent from his customers to conduct insurance transactions in the manner he did, which was evidenced when the customers sent him an email or corresponded back and forth. When questioned on the difference between implied and express consent, the Former Nominee stated, *"the only thing [he knew was]…to service my client and do what's in their best interest."* The Former Nominee admitted to signing his clients' names to speed up transactions and realized he should not have done so. He did not tell his clients that he was signing on their behalf, but he believed they would not have cared because they trusted him and just wanted the transactions processed.

20. On August 6, 2025, ICBC advised Council's investigator that there were no additional documents or evidence confirming that the Licensee processed the Optional Coverage and Rate Class Reduction transactions without customers' consent.

21. On August 15, 2025, ICBC provided Council's investigator with a list of 10 customers from 2024 for whom the Licensee processed rate class reduction changes. Council's investigator attempted to contact them to determine whether the changes had been made with customer consent. Of the 10 customers, two did not answer, and one was a wrong number. There were six reachable customers. Among those contacted, two customers stated they were unaware of the delivery use rating and had not requested it, and four customers confirmed they had specifically requested delivery use.

22. As a result of ICBC's investigation, on July 28, 2025, the Licensee was suspended from conducting Autoplan business and accessing ICBC's Broker Connect for a period of 180 days.

23. At the Review Committee meeting, the Licensee explained that his experience at the Agency was his first role doing any type of insurance business. The Licensee explained that he was trained by the Former Nominee, and stated that he learned about Autoplan basics about a month after obtaining his Level 1 licence. The Licensee explained that he worked closely with the Former Nominee and maintained a close relationship with the Former Nominee while at the Agency. The Licensee stated that, over time, as he became more knowledgeable, he began to realize that the way he was processing the rate class reductions was incorrect, and he stopped. The Licensee also expressed confusion about his termination from the Agency, noting that he was never advised by KM or NN that the Former Nominee was engaging in unacceptable practices, and that when he raised his concerns, nothing resulted from those discussions. The Licensee reflected on his actions and realized that applying the higher rate class and then reducing it was wrong, and stated that if he had more experience at the time, he would not have completed those transactions in that manner. The Licensee stated that at that time, he was conducting business as the Former Nominee had advised him, and that when he realized that what he was doing was incorrect, he stopped. The Licensee stated that the situation has caused him stress and financial losses, including being prohibited from doing ICBC work for 6 months.

ANALYSIS

24. Council determined that the Licensee inappropriately processed 31 Autoplan policies by renewing clients' policies with a higher rate class and then issuing a policy change to a lower rate class. Council found the Licensee's conduct in processing the Autoplan renewal in this manner to be contrary to the clients' needs, as the Licensee was processing the policy renewals based on rate classes that were not

applicable to the clients. The Licensee stated that he completed these transactions with clients' consent, but was unable to provide documentation supporting any client's instructions to proceed in this manner. Regardless of whether clients consented to renew their Autoplan policy in this manner, the Licensee should not have processed the transaction in a manner that was not suitable for the clients' needs. Additionally, processing renewals in this manner is contrary to the best interests of the insurer. Renewals are processed at a higher premium, resulting in a higher commission paid to the licensee, but when the policy was changed to the appropriate rate class shortly after being issued, this resulted in a loss to the insurer. Council found that the Licensee's actions were not in line with the usual practice and demonstrated a lack of competence. Council concluded that the Licensee's misconduct amounted to breaches of Council Rules 7(8) and 7(9) and Code of Conduct section 5 ("Competence"), section 7 ("Usual Practice: Dealing with Clients") and section 8 ("Usual Practice: Dealing with Insurers").

25. Council did not believe that the Licensee's actions reflected negatively on his trustworthiness or ability to act in good faith. Council accepted the Licensee's submission that he had no insurance background and was learning how to conduct insurance business from the Former Nominee from the time he was first licensed until he was terminated from the Agency. Council concluded that there was a lack of direction from the Agency as to how to appropriately conduct insurance business, and that the Licensee's first exposure to the industry was in an environment shaped by his learning from the Former Nominee. Council further found there to be a very apparent power imbalance given that the Former Nominee was both the nominee and majority owner of the Agency, while the Licensee was only just learning about the insurance business. Council found that the Licensee's only experience in the insurance industry was in an inappropriate environment where the Licensee was taught to conduct his business in this manner. Council found it troubling that the office manager and KM knew that the Former Nominee was engaging in practices that were outside the usual practice and did not take any steps to rectify this within the Agency.

26. Council believes that the Licensee did not intend to defraud ICBC and that he genuinely believed, based on his experience, training and mentorship from the Former Nominee, that he was permitted to conduct insurance transactions in this manner. Council determined that the Licensee's knowledge of what was appropriate and usual practice was directly influenced by the Former Nominee, and that the conduct the Licensee engaged in was a product of his environment and not a reflection of the Licensee's trustworthiness. Council noted that the Licensee brought his concerns about the Former Nominee to KM and that neither KM nor the office manager took steps to address the issues or make corrections within the Agency. It is clear to Council, based on interviews with KM and the office manager at the time, that the Former Nominee regularly engaged in inappropriate insurance business and was instructing licensees within the Agency to conduct their business in this manner. Council concluded that the Licensee's close relationship with the Former Nominee, as well as the position of

authority the Former Nominee had as a nominee and owner of the Agency, created a situation where the Licensee felt compelled to follow the Former Nominee's instructions.

PRECEDENTS

27. Before making its decision in this matter, Council took into consideration the following precedent cases. While Council is not bound by precedent and each matter is decided on its own facts and merits, Council found that these decisions were instructive in providing a range of sanctions for similar types of misconduct.

28. *Decision No. 2017-FIA-002(a), 003(a), 004(a), 005(a), 006(a), 007(a) and 008(a)*: published by the Financial Services Tribunal (the "FST") in July 2018 (the "Toll Bridge Decision"). This decision concerned seven licensees who had each, on multiple occasions, exploited a "glitch" in ICBC software that allowed agents to bypass the normal system restrictions that, at the time, prevented Autoplan insurance from being renewed for a customer with outstanding toll bridge debts. Each of the licensees had used the glitch to allow customers to renew their insurance without first settling their toll bridge debts; the number of incidents ranged from 32 to 116. In each case, Council imposed a $5,000 fine for misconduct. Council's decision, however, was challenged, and it was argued that a $5,000 fine was not a significant enough sanction given the untrustworthiness displayed by the licensees, and the matter was brought to the FST for review. The FST concluded that a $5,000 fine did not reasonably protect the public interest, and emphasized that in scenarios involving licensees habitually behaving in an untrustworthy manner, it was wrong to assume that they would not pose an ongoing risk to the public or ICBC. The FST stated that a six-month suspension and the requirement to take an ethics course should serve as the baseline reasonable penalty, which could be adjusted depending on the particular mitigating and aggravating factors applicable in each case.

29. *Derek William Fung* (February 2025): concerned a former level 1 general insurance salesperson licensee who processed 55 transactions involving new or newer luxury vehicles. The former licensee issued 55 one-year ICBC Autoplan insurance policies, cancelled all of the policies, and then facilitated the transfer of ownership to subsequent owners, all within three days or less. The former licensee also expressed regret for his actions and stated he did not intend to defraud ICBC and thought this practice was allowed. Council determined that the Former Licensee repeatedly placed and collected commissions for one-year Autoplan insurance policies when he ought to have known they were suspicious, not intended for the purpose of operation on a British Columbia highway for a one-year period, and would be cancelled shortly after being issued. The former licensee admitted that he sold customers one-year policies knowing that they would be cancelled shortly after being issued. As a result, Council ordered that the former licensee be fined $2,000, be ineligible to hold an insurance

licence for a period of one year, be required to take an ethics course and be assessed investigation costs.

30. *Ada Chung Man Tang* (January 2025): concerned a former level 2 general insurance agent licensee who issued 42 one-year insurance policies, subsequently cancelled all of the policies and then facilitated the transfer of ownership of the vehicles to mainly one subsequent owner. Council determined that the former licensee repeatedly processed and collected commissions for one-year Autoplan insurance policies in circumstances where the former licensee ought to have known that the transactions were suspicious and not intended for the purpose of operation on a British Columbia highway or would be cancelled shortly after being issued. Additionally, Council concluded the former licensee should have known that issuing these 42 one-year Autoplan policies was contrary to ICBC's procedures and interests, and that she could not rely on her willful blindness to the circumstances as a defence. As a result, Council ordered a $7,000 fine, determined that the former licensee would not be eligible to hold an insurance licence for a period of one year, and prohibited her from becoming a Level 2 general insurance agent for one year should she become licensed in the future. Council also required her to complete courses and assessed investigation costs.

31. *Anthony Bryan Chua Cua* (February 2021): concerned a level 2 general insurance agent licensee who unethically profited from commissions received from ICBC by regularly processing one-year vehicle insurance policies for an automobile dealership engaged in the export of vehicles out of Canada and then cancelling the policies several days later. The licensee was found to have processed at least 129 transactions for the dealership and had served as a straw buyer on two occasions by purchasing two vehicles using funds provided by the dealership. In total, the licensee earned over $24,000 in commissions from ICBC. Council found that the licensee's actions demonstrated an overall lack of trustworthiness and good faith and were exploitative of ICBC and its commission system. In terms of mitigating factors, Council believed that the remorse shown by the licensee was genuine and noted that the licensee was a relatively inexperienced agent with no previous disciplinary history at the time of the misconduct. Most notably, Council considered that the licensee had already experienced sanctions from ICBC, having had his Autoplan privileges suspended for a year and being required to complete courses. As for aggravating factors, Council found that the licensee's actions were financially motivated and demonstrated a lack of due diligence and an incredible amount of wilful blindness. Council believed its decision should send a message to the insurance industry and public that generating commissions by processing exploitative transactions is not acceptable, and that licensees should self-correct and seek guidance and clarification in situations in which they suspect there may be ethical problems. Council ordered that the licensee's general insurance licence be suspended for a period of one year and downgraded to a level 1 salesperson general insurance licence for a period of one year of active licensing. The licensee was also fined $7,000 and assessed investigation costs.

32. *Harry William Forsberg* (November 2019): concerned a level 2 general insurance agent licensee who entered false information relating to ICBC Autoplan transactions in an effort to override outstanding toll bridge debts owed by his customers and/or himself or his family members. It was noted in the ICBC Autoplan Manual that customers with unpaid toll bridge fees were subject to a refuse-to-issue (RTI) by ICBC on their driver's licences, vehicle licences and insurance policies. During the investigation, ICBC determined that the licensee had processed six Autoplan transactions using false receipt numbers, resulting in the removal of the RTI without the toll bridge debt being collected. ICBC also determined that the licensee had facilitated the processing of two Autoplan transactions for his own vehicle with an RTI restriction by knowingly providing false authorization numbers to another agency staff member to remove the RTI restriction. The hearing committee found that the licensee's conduct was a direct contravention of the Rules and was a gross breach of his professional obligations, which the licensee knew or ought to have known. The hearing committee ordered that the licensee's licence be suspended for eight months and that he be fined $3,000, required to complete an ethics course and assessed investigation costs.

MITIGATING AND AGGRAVATING FACTORS

33. Council considered relevant mitigating and aggravating factors in this matter. Council found the Licensee's co-operation throughout the investigation and his acknowledgement of the misconduct to be mitigating. Council also found it mitigating that the Licensee had limited experience and exposure to the insurance industry, which contributed to the Licensee's mistaken belief at the time that he could conduct these Autoplan renewals in this manner. Council noted that the Licensee had already suffered consequences for his actions as a result of his six-month prohibition from conducting ICBC transactions. Council noted that the conduct took place over 31 transactions, which it found aggravating.

CONCLUSIONS

34. After weighing all of the relevant considerations, Council found the Licensee to be in breach of the Council Rules and the Code of Conduct.

35. Council reviewed the precedents and found the *Fung* case to be the most instructive, although Council found the Licensee's conduct less egregious than in all of the precedents. Council noted that in this case, there were no concerns of trustworthiness and therefore Council did not believe a suspension was required, differentiating the facts of this case compared to *Decision No. 2017-FIA-002(a), 003(a),*

004(a), 005(a), 006(a), 007(a) and 008(a). Council does not have any concerns about the Licensee's suitability and found that his breaches and conduct were the result of the Agency environment; therefore, Council determined that a fine in the amount of the *Fung* case was appropriate. Additionally, Council determined that the Licensee be required to take an ethics course to refresh the Licensee's knowledge of his ethical obligations and duties.

36. With respect to investigation costs, Council has concluded that these costs should be assessed to the Licensee. As a self-funded regulatory body, Council looks to licensees who have engaged in misconduct to bear the costs of their discipline proceedings, so that those costs are not otherwise borne by British Columbia's licensees in general. Council has not identified any reason not to apply this principle in the circumstances.

INTENDED DECISION

37. Pursuant to sections 231 and 241.1 of the Act, Council made an intended decision that:

    a. The Licensee be fined $2,000, to be paid within 90 days of Council's order;

    b. The Licensee be required to complete the following courses, or equivalent courses as acceptable to Council, within 90 days of Council's order:

        i. The Council Rules Course for General Insurance Agents, Salespersons and Adjusters; and

        ii. Ethics and the Insurance Professional course, available through the Insurance Institute of Canada

        (collectively, the "Courses");

    c. The Licensee be assessed Council's investigation costs in the amount of $1,031.25, to be paid within 90 days of Council's order; and

    d. A condition be imposed on the Licensee's general insurance licence that failure to pay the fine and investigation costs and complete the Courses within 90 days of the date of Council's order will result in the automatic suspension of the Licensee's licence and the Licensee will not be permitted to complete the Licensee's 2028 annual licence renewal until such time as the Licensee has complied with the conditions listed herein.

38. Subject to the Licensee's right to request a hearing before Council pursuant to section 237 of the Act, the intended decision will take effect after the expiry of the hearing period.

ADDITIONAL INFORMATION REGARDING FINES/COSTS

39. Council may take action or seek legal remedies against the Licensee to collect outstanding fines and/or costs, should these not be paid by the 90-day deadline.

RIGHT TO A HEARING

40. If the Licensee wishes to dispute Council's findings or its intended decision, the Licensee may have legal representation and present a case in a hearing before Council. Pursuant to section 237(3) of the Act, to require Council to hold a hearing, the Licensee **must give notice to Council by delivering to its office written notice of this intention within 14 days of receiving this intended decision.** A hearing will then be scheduled for a date within a reasonable period of time from receipt of the notice. Please direct written notice to the attention of the Executive Director. **If the Licensee does not request a hearing within 14 days of receiving this intended decision, the intended decision of Council will take effect.**

41. Even if this decision is accepted by the Licensee, pursuant to section 242(3) of the Act, the British Columbia Financial Services Authority ("BCFSA") still has a right of appeal to the Financial Services Tribunal ("FST"). The BCFSA has thirty (30) days to file a Notice of Appeal once Council's decision takes effect. For more information respecting appeals to the FST, please visit their website at www.bcfst.ca or visit the guide to appeals published on their website at guidelines.pdf.

Dated in Vancouver, British Columbia, on the **2nd day of June, 2026**.

For the Insurance Council of British Columbia

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Per Janet Sinclair
Executive Director