In the Matter of the

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

and the

INSURANCE COUNCIL OF BRITISH COLUMBIA
("Council")

and

GURMOHIT SINGH GILL
(the "Licensee")

ORDER

As Council made an intended decision on June 16, 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 July 6, 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 $2,500, to be paid by October 20, 2026;

2) The Licensee is required to complete the following courses, or equivalent courses as acceptable to Council, by October 20, 2026:

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

    ii. The Insurance Council's Client Confidentiality Course; and

    iii. The 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 of $1,687.50, to be paid by October 20, 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 20, 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 **22nd day of July, 2026**

Janet Sinclair, Executive Director
Insurance Council of British Columbia

INTENDED DECISION

of the

INSURANCE COUNCIL OF BRITISH COLUMBIA
("Council")

respecting

GURMOHIT SINGH GILL
(the "Licensee")

1. Pursuant to section 232 of the *Financial Institutions Act* (the "Act"), Council conducted an investigation to determine whether the Licensee renewed an Autoplan insurance policy without client consent and fraudulently signed the renewal document in the client's name.

2. On April 14, 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 Licensee and Committee before the meeting. A discussion of the investigation report took place at the meeting, and having reviewed the investigation materials and after discussing 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 June 16, 2026, meeting, where it was determined that 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 Level 1 general insurance salesperson ("Level 1 Salesperson") licence since December 7, 2020.

6. The Licensee held an authorization to represent (“ATR”) an insurance agency (the “Agency”) from February 8, 2024, to May 30, 2025.

7. On June 2, 2025, Council received an email from the Agency reporting that the Licensee had breached the Council Rules and Code of Conduct. The Licensee had renewed an Autoplan policy without client consent, fraudulently signed the renewal document in the client’s name, and retroactively obtained client consent after the Insurance Corporation of British Columbia (“ICBC”) and the Agency initiated an investigation.

8. In May 2024, the Licensee processed a vehicle ownership transfer to facilitate a vehicle purchase by EK (the “Client”) at a motor vehicle dealership. The renewal for the policy was dated May 18, 2025.

9. On May 24, 2025, RD, the Agency's managing partner, received an email from ICBC requesting information about an Autoplan renewal that the Licensee allegedly renewed without the Client’s consent. According to the email, when the Client went to her usual brokerage to renew her insurance, she discovered it had already been renewed by the Licensee. RD then reached out to the Licensee, who was out of town at the time. The Licensee informed RD that he had reached out to the Client to notify her of the renewal, but he did not receive a response and decided to proceed with the renewal anyway.

10. On the same day, an Agency employee advised the Agency’s nominee, GG, that the signature on the renewal did not match the signature on the original transaction. The following day, on May 25, 2025, GG reviewed the renewal document and noted that a client signature was affixed to the document. GG noted that the signatures on the original document and the renewal document did not match, raising significant concerns.

11. On May 30, 2025, GG and RD interviewed the Licensee at the Agency office. The Licensee stated during the interview that he had obtained the retroactive consent of the Client. The Licensee stated that he had reached out to the Client on May 29, 2025, explained the situation and persuaded the Client to provide email-based consent. Additionally, the Licensee admitted that he had falsified the Client’s signature and put it in the ICBC batch once he had processed the renewal. The Licensee was informed that his employment was terminated, effective immediately.

12. On August 7, 2025, Council staff contacted the Client to obtain clarification on the retroactive renewal consent she had provided on May 29, 2025. The Client advised that she did not want to be involved in the investigation.

13. On August 13, 2025, Council staff interviewed the Licensee, who provided information including the following:

    - When asked why he had decided to renew the Client’s policy even though he had not heard back from her, the Licensee stated:

"*Just because I thought she would be -- I had a pretty good exchange with her the first time I met her. The next time, like, I didn't know she wouldn't be, like, she wouldn't be okay with it. And so I went ahead, and prematurely and issued it.*"

- He stated this was the only time he had renewed a policy without client consent and he expressed regret for doing so.
- He stated he "*was just being too greedy at the time. Whether whatever it was, the commission or just wanting every client.*"
- When asked why he forged the Client's signature on the renewal document, he stated, "*I was trying to cover up, basically, my mistake, right? Just didn't have the consent. And then I didn't know what to do and I panicked and signed it on behalf of her…and I attached those to the transaction.*"
- He stated that he "*just put whatever I thought would be her signature. Like I just squiggled or whatever I thought.*"
- He had stated that he did not notify the Client of the renewal and believed the Client went to her preferred broker to ask for a reprint of the renewed policy.
- When asked why he believed the Client would go to a brokerage to reprint a policy she was unaware had been renewed, the Licensee stated: "*She -- from my -- because she probably thought that I already had done it, the renewal.*"

14. On September 5, 2025, ICBC informed Council that it would not pursue action against the Licensee at that time.

15. The Licensee told the Committee that he had made a poor decision in renewing the Client's policy before receiving consent. However, the Licensee was adamant that the Client did not expressly decline the renewal request. He stated that he had renewed the policy to ensure that the Client did not lose coverage. The Licensee admitted that his actions could have resulted in client harm, given that he did not confirm the Client's insurance needs before conducting the transaction. When asked why he did not self-report this incident to the Agency, he stated that he did not want to get into trouble.

16. The Licensee stated that he forgot to send the renewal documents to the Client because he went on vacation shortly after conducting the renewal transaction. The Agency initiated its investigation upon his return from vacation and the Licensee became aware at that time that he should have sent the renewal document to the Client. The Licensee explained that it was at this time that he convinced the Client to give retroactive consent.

17. The Licensee stated that he had faced financial pressure from the Agency to sell policies, and that he had specific sales targets to meet.

18. As of the date of the Committee meeting, the Licensee stated that he is currently completing his post-secondary studies and has not been working since his termination from the Agency. He intends to return to the insurance industry at a later time, stating that it "*compensates well*".

ANALYSIS

19. Council considered the impact of Council's Code of Conduct (the "Code") on the Licensee's conduct, including section 3 ("Trustworthiness"), section 4 ("Good Faith"), section 5 ("Competence"), section 7 ("Usual Practice: Dealing with Clients") and section 8 ("Usual Practice: Dealing with Insurers"). Council concluded that the Licensee's conduct amounted to clear breaches of the aforementioned sections of the Code and the professional standards set by the Code. Licensees are required by Council Rule 7(8) to comply with the Code. Additionally, Council determined that the Licensee breached Council Rule 7(1), which requires licensees to hold in strict confidence information about a client and not use the information for an unrelated transaction unless expressly authorized by the client.

20. Council determined that the Licensee breached the principles of trustworthiness and good faith by renewing the Client's policy without her knowledge and consent, failing to inform the Client that the policy was renewed and forging her signature in an attempt to illustrate consent. The Licensee did not confirm the Client's insurance needs before conducting the transaction, putting the Client at risk of loss in the event of an insurance claim. The Licensee admitted that he was motivated by greed. Accordingly, Council did not accept the Licensee's explanation that he had renewed the policy to prevent the Client from losing insurance coverage. Given the facts as a whole, Council determined that the Licensee did not act in the Client's best interests. Council also noted that the Licensee did not self-report his actions to the Agency or to ICBC, which Council found to be further examples of the Licensee's breach of the good faith requirements.

21. Similarly, Council concluded that the Licensee failed to conduct insurance activities in a competent manner. Council believed that a reasonable and prudent licensee in similar circumstances would not have taken the same actions as the Licensee. Council believed that, at the very least, the Licensee could have been forthright with the Client by notifying her and providing her with renewal confirmation documents. The Licensee's actions demonstrated a lack of due diligence. Council also noted that the Licensee used the Client's information from the vehicle ownership transfer to conduct the renewal transaction, which Council found to be a breach of Council Rule 7(1). Council believed that the Licensee did not have the Client's express authorization to use the information in this regard.

22. Additionally, Council determined that the Licensee's actions breached the usual practices of dealing with clients and insurers. The Licensee should have evaluated the Client's insurance needs and confirmed with the Client any necessary amendments to her coverage before conducting the renewal transaction. Accordingly, the Licensee failed to provide accurate information about the Client's insurance needs to ICBC. Also, by conducting this renewal transaction, the Licensee would have breached the authority granted by ICBC. The Licensee did not protect the Client's interests and failed to act with integrity, competence and utmost good faith. Further, Council questioned whether the Client understood the consequences of her policy being renewed before she had provided retroactive consent.

PRECEDENTS

23. 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.

24. *Lisa Marie Berry* (March 2026): concerned a Level 1 general insurance salesperson who copied and pasted client signatures from old insurance forms onto new ones, and submitted insurance quotes to be bound by using pre-signed forms signed by other licensees at her agency. The licensee did not obtain written consent from clients to use their signatures. By submitting the pre-signed forms, the licensee misled the insurer into believing that the agency had reviewed and recommended the risk submitted. Council accepted as mitigating factors that the licensee self-reported her conduct and co-operated with Council's investigation. Council fined the licensee $1,500, required her to complete an ethics course and a client confidentiality course, and assessed investigation costs.

25. *Lini Outh* (August 2020): concerned a Level 1 general insurance salesperson who fraudulently transferred and insured a vehicle under the name of a person she did not meet and without his knowledge or consent, and when the transactions were discovered, fraudulently transferred the vehicle back to a motor vehicle dealership. In doing so, the licensee had knowingly provided documentation to ICBC that contained false signatures. The licensee was suspended by her agency for two weeks without pay as a result of her misconduct, which Council accepted as a mitigating factor. Council also considered that the licensee was forthcoming and co-operative with its investigation, and that she did not act with ill intent. However, Council found it aggravating that the licensee transferred the vehicle not once, but twice. In Council's view, the licensee should have refused the transactions, or at the very least, sought assistance from her agency before proceeding. Council fined the licensee $1,000, required her to complete the Council Rules Course and an ICBC Autoplan course, and assessed investigation costs.

26. *Christine Helene Craig* (August 2019): concerned a Level 3 general insurance agent who forged a number of client signatures on ICBC documents. Council accepted that the misconduct did not occur regularly and only occurred when efforts to contact clients were unsuccessful. Council further accepted that the licensee had no malicious intent, there was no evidence of client harm and that she was extremely remorseful. However, Council found that the licensee ought to have known it was wrong to forge a client's signature. Council fined the licensee $1,000, required the licensee to complete an ethics course and the Council Rules Course, and assessed investigation costs.

27. *Whitney Elizabeth Bressel* (June 2015): concerned a Level 2 general insurance agent who conducted a personal ICBC transaction using a co-worker's agency-assigned producer code, without the co-worker's knowledge or consent, and signed a client's signature on a payment agreement without the client's knowledge or consent. Council concluded that the licensee conducted the ICBC transaction for personal gain. Council found that the licensee was intentionally misleading in her statements to Council that she used the co-worker's producer code to help with the co-worker's sales targets, and

that the client authorized the licensee to sign the payment agreement. Council suspended the licensee's general insurance licence for one year, required the licensee to complete an ethics course and assessed investigation costs.

MITIGATING AND AGGRAVATING FACTORS

28. Council considered relevant mitigating and aggravating factors. In terms of mitigating factors, Council accepted that the Licensee acknowledged the misconduct and expressed remorse for his actions. Additionally, Council considered that the Licensee was terminated by the Agency. Council also considered that the Licensee had obtained client consent; however, it was obtained retroactively after the policy renewal. Council believed that the Licensee's misconduct was isolated in nature.

29. In terms of aggravating factors, Council found that the Licensee put the Client at risk by renewing a policy without her knowledge and without confirming that her insurance needs were met. Without the appropriate insurance coverage, there is a potential for loss for the Client, which Council found to be an aggravating factor. Council also considered that the Licensee was motivated by financial gain, as he had admitted that he had been "greedy" and had sales targets to meet. Council concluded that, more likely than not, the Licensee lied when he stated that he renewed the Client's policy to ensure that the Client did not lose coverage. Council did not believe that the Licensee had the Client's best interests in mind when he conducted the policy renewal.

30. In all, Council placed equal weight on the aggravating and mitigating factors.

CONCLUSIONS

31. After weighing all of the relevant considerations, Council has concluded that the Licensee should be fined $2,500. Although the fine is higher than that in *Berry* and *Outh*, Council noted that the Licensee conducted the renewal transaction of his own volition and for financial gain.

32. Further, Council has determined that the Licensee should be required to complete courses on Council Rules, ethics and client confidentiality.

33. Council has determined that investigation costs should be assessed against the Licensee. As a self-funded regulatory body, Council looks to licensees who have engaged in misconduct to bear the costs of their disciplinary proceedings, so that those costs are not otherwise borne by British Columbia's licensees in general. Council has not identified any reason for not applying this principle in the circumstances.

INTENDED DECISION

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

    a. The Licensee be fined $2,500, 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;

        ii. The Insurance Council's Client Confidentiality Course; and

        iii. The 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 of $1,687.50, 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.

35. 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

36. 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

37. 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 fourteen (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.**

38. 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 **6th day of July 2026.**

For the Insurance Council of British Columbia

Janet Sinclair
Executive Director