In the Matter of the

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

and the

INSURANCE COUNCIL OF BRITISH COLUMBIA
("Council")

and

LILI WU
(the "Former Licensee")

ORDER

As Council made an intended decision on July 28, 2026, pursuant to section 231 of the Act; and

As Council, in accordance with section 237 of the Act, provided the Former Licensee with written reasons and notice of the intended decision dated August 6, 2026; and

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

Under authority of section 231 of the Act, Council orders that:

1) The Former Licensee is fined $500, to be paid by November 24, 2026;

2) The Former Licensee is required to complete the following courses, or equivalent courses as acceptable to Council, prior to being licensed in the future:

    a. The Council Rules Course for Life and/or Accident & Sickness Insurance Agents; and

    b. Continuing Education Requirements & Guidelines Course

    (collectively, the "Courses")

3) The Former Licensee is required to complete the outstanding two continuing education credits by November 24, 2026; and

4) Council will not consider an application for any insurance licence from the Former Licensee until the fine is paid in full and the Courses and the two continuing education credits have been completed.

This order takes effect on the **26th day of August, 2026**

Janet Sinclair, Executive Director
Insurance Council of British Columbia

INTENDED DECISION

of the

INSURANCE COUNCIL OF BRITISH COLUMBIA
("Council")

respecting

LILI WU
(the "Former Licensee")

1. Pursuant to section 232 of the *Financial Institutions Act* (the "Act"), Council conducted an investigation to determine whether the Former Licensee had acted in compliance with the requirements of the Act, Council Rules, and Code of Conduct regarding allegations that the Former Licensee failed to meet the continuing education ("CE") requirements for the 2024/2025 licensing period (the "Licence Period").

2. As part of Council's investigation, the Former Licensee was provided with an investigation report, and on June 11, 2026, the Former Licensee acknowledged the breaches contained within the investigation report and accepted responsibility for her conduct. The Former Licensee agreed that remedial action was necessary as a result of the referenced breaches.

3. The investigation materials and the Former Licensee's admission were reviewed by Council at its July 28, 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 Former Licensee of the action it intends to take under section 231 of the Act before taking any such action. The Former 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 Former Licensee.

FACTS

5. The Former Licensee became licensed with Council as an accident and sickness insurance agent on August 7, 2019. The Former Licensee's licence was cancelled due to non-renewal on August 4, 2026.

6. The Former Licensee completed her annual licence renewal declaration on April 9, 2025, affirming that she had met all the CE requirements. On June 10, 2025, Council staff conducted an audit based on the Former Licensee's 2024/2025 annual licence renewal declaration. As part of the audit, Council staff asked the Former Licensee to provide CE records for the Licence Period.

7. The Former Licensee could not demonstrate she had obtained the required total of 15 CE credits for the Licence Period. When the deficiencies were brought to the Former Licensee's attention, the Former Licensee completed 15 CE credits. Council staff determined that 13 of the 15 CE credits were eligible for the Former Licensee's licence class.

8. The Former Licensee advised that she had been dealing with personal issues which resulted in the Former Licensee focusing on other employment. The Former Licensee further advised that the CE deficiencies were a result of being unable to devote sufficient time to her insurance business. The Former Licensee also stated that she would not renew her licence and was intending to leave the industry.

9. The Former Licensee has not completed the remaining 2 CE credits required for the Licence Period.

ANALYSIS

10. Council determined that the Former Licensee failed to obtain the required CE credits for the Licence Period and is in breach of Council Rules 7(5) and 7(8), as well as section 5 ("Competence") of the Code of Conduct.

PRECEDENTS

11. Prior to making its recommendation, 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 terms of providing a range of sanctions for similar types of misconduct.

12. *Levita Bueno Velasco* (November 2023): involved a licensee who failed to complete continuing education credits for the 2018/2019, 2019/2020 and 2020/2021 licence periods. Although the licensee attempted to complete the outstanding continuing education credits, at the time of the investigation she had only completed 20 of the 45 outstanding credits. Council determined that it was appropriate to fine the licensee $1,000 for each licence period in which she had not met the continuing education requirements. The licensee was fined $3,000, required to take the Council Rules Course and assessed investigation costs.

13. *Xiao Yan (Ceila) Xu* (May 2024): involved a licensee who failed to complete continuing education credits for the 2019/2020 and 2020/2021 licence periods. The licensee completed all outstanding continuing education credits and showed remorse for her failure to complete the credits. Given the licensee's efforts to self-correct and complete all outstanding continuing education credits, Council ordered that the licensee be assessed a fine of $500 for each licence period in which she did not meet the continuing education requirements.

MITIGATING AND AGGRAVATING FACTORS

14. Council identified several mitigating factors in this matter. The Former Licensee accepted and acknowledged the misconduct, which Council views as a mitigating factor. Further, the Former Licensee accepted that remedial action against her is warranted. Additionally, Council considered that the Former Licensee cooperated with its audit. Council did not identify any significant aggravating factors.

CONCLUSIONS

15. Council took into account the mitigating factors when determining what fine is an appropriate response to the Former Licensee's failure to complete the required CE credits for the Licence Period in question. Council determined that this matter had mitigating factors and no significant aggravating factors, and that similar to the *Xu* precedent, a fine lower than the $1,000 for each year threshold is justified in these circumstances. Council concluded that a $500 fine is appropriate for the Licence Period in which the Former Licensee had a CE shortfall.

16. 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 notes that in this particular instance, the Former Licensee's full co-operation and assistance in expediting the investigation process are important factors to consider when determining if costs should be assessed. In these circumstances, Council has determined that no costs shall be assessed against the Former Licensee.

INTENDED DECISION

17. Pursuant to section 231 of the Act, Council made an intended decision that:

    a. The Former Licensee be fined $500, to be paid within 90 days of Council's order;

    b. The Former Licensee be required to complete the following courses, or equivalent courses as acceptable to Council, prior to being licensed in the future:

        i. The Council Rules Course for Life and/or Accident & Sickness Insurance Agents; and

        ii. Continuing Education Requirements & Guidelines course

        (collectively, the "Courses");

c. The Former Licensee be required to complete the outstanding two continuing education credits within 90 days of Council's order; and

d. Council will not consider an application for any insurance licence from the Former Licensee until the fine is paid in full and the Courses and the two continuing education credits have been completed.

18. Subject to the Former 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

19. Council may take action or seek legal remedies against the Former Licensee to collect the outstanding fine, should this not be paid by the 90-day deadline.

RIGHT TO A HEARING

20. If the Former Licensee wishes to dispute Council's findings or its intended decision, the Former 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 Former 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 Former Licensee does not request a hearing within 14 days of receiving this intended decision, the intended decision of Council will take effect.**

21. Even if this decision is accepted by the Former 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 https://www.bcfst.ca/ or visit the guide to appeals published on their website at https://www.bcfst.ca/app/uploads/sites/832/2021/06/guidelines.pdf.

Dated in Vancouver, British Columbia on the **6th day of August, 2026.**

For the Insurance Council of British Columbia

Janet Sinclair
Executive Director