

In the matter of the
FINANCIAL INSTITUTIONS ACT
(RSBC 1996, c. 141)
(the “Act”)

and the

INSURANCE COUNCIL OF BRITISH COLUMBIA
(“Council”)

and

PRINCE MARTIN OLA (formerly known as PRINCE MARTIN MAYELE)
(the “Licensee”)

ORDER
UNDER SECTIONS 231 & 238 OF THE ACT

Pursuant to sections 231 and 232 of the Act, Council conducted an investigation regarding the matter of whether the Licensee made material misstatements in the Licensee’s application for an insurance licence and in reply to an inquiry made by Council under the Act, whether the Licensee no longer meets the licensing requirements or did not meet the requirements at the time the licence was issued, and whether the Licensee in his representation to the public has breached the Act, Council’s Rules and Council’s Code of Conduct.

After due investigation of this matter, and based on Council’s written Reasons for Decision after Council’s consideration of the relevant evidence including the Licensee’s responses to questions which were raised with the Licensee during the investigation, Council orders:

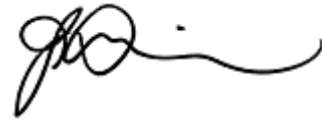
1. That pursuant to section 231(1) of the Act, Council intends to make an order, as follows:
 - (a) the Licensee’s life and accident and sickness insurance licence be cancelled; and
 - (b) any application by the Licensee for an insurance licence will not be considered for a period of three years after the date of Order.

2. That pursuant to section 238(1) of the Act, Council considers that the length of time required to hold a hearing would be detrimental to the due administration of the Act, and that the Order be made effective from the date on which the Order is issued.

TAKE NOTICE that, pursuant to section 238(2) of the Act, a person directly affected by an order made under section 238(1) of the Act may, within 14 days of receiving a copy of the order:

- (a) require a hearing before Council by delivering written notice to Council (at Suite 1400, 745 Thurlow Street, Vancouver, British Columbia, V6E 0C5); or
- (b) appeal the order to the Financial Services Tribunal.

Dated in Vancouver, British Columbia, on the **14th day of August, 2024.**



Janet Sinclair, Executive Director
Insurance Council of British Columbia

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REASONS FOR DECISION

1. These are the Reasons for the Order made by Council pursuant to sections 231(1) and 238(1) of the Act, following an investigation regarding: whether the Licensee made material misstatements in the Licensee’s application for an insurance licence and reply to an inquiry made by Council under the Act; whether the Licensee no longer meets the licensing requirements or did not meet the requirements at the time the licence was issued, and whether the Licensee in his representation to the public has breached the Act, Council’s Rules and Council’s Code of Conduct.

BACKGROUND

2. On March 28, 2023, Council’s Licensing Department (the “Licensing Department”) received a completed online application for a life and accident and sickness insurance agent (“Life Agent”) licence from the Licensee. As part of the application, the Licensee answered “no” to the question “do you have a criminal record.” The criminal record check provided by the Licensee from the Royal Canadian Mounted Police (“RCMP”) did not identify any criminal record. The licence application was approved, and the Licensee received a Life Agent licence on April 5, 2023. The Licensee’s Life Agent licence was granted as an affiliated agent representing an agency (“Agency 1”).

3. On July 4, 2023, Agency 1 removed the Licensee's authority to represent ("ATR") as the Licensee had resigned. On July 21, 2023, the Licensing Department received an authorization letter from an insurer, an Add ATR Form, a Supervisor Undertaking Form, and Errors & Omissions ("E&O") insurance coverage. The Licensee's Life Agent licence became active again on July 26, 2023.
4. On December 20, 2023, the Financial Services Regulatory Authority of Ontario ("FSRA") informed the Licensing Department that the Licensee had applied for a life insurance agent licence in Ontario. During its licence application review, FSRA identified a match for the Licensee in the United States of America ("US") with potential criminal activity.
5. The Licensee did not disclose any criminal record on their Life Agent licence application with Council.
6. On March 1, 2024, Council staff wrote to the Licensee requesting information relating to the US criminal charge and requesting confirmation that the charges were against the Licensee. On the same day, the Licensee replied via email advising that the United States District Court for the Western District of Washington publication was not about him.
7. On April 3, 2024, the Licensing Department received a Notice of Termination of Sponsorship and Termination of Supervisor letter from the insurer that stated: "A recent investigation found that the above agent violated company policy by failing to provide a truthful response to a criminal background check during his onboarding process as well as in response to the Regulators."
8. Pursuant to Council Rule 7(16.1) and Rule 7(16)(a) a new Life Agent may only conduct insurance activities under the supervision of a life agent supervisor and must have written authorization to represent at least one insurer. As the Licensee no longer had a supervisor and did not hold any written authorization representing an insurer, the Licensee's Life Agent licence became inactive on April 5, 2024, as the Licensee did not meet the licensing requirements for a Life Agent licence.
9. On April 16, 2024, the Licensing Department received by email the Add ATR Form to represent a new insurer and Supervisor Undertaking form to reactivate the Licensee's Life Agent licence. In the same email, the Licensee's email signature states:

Smart working Team Prince Mayele
DUMONDE FINANCIERE CANADA INC.
(Insurance Brokerage - "Living Benefits Expert")
Sales/Recruiting Manager

10. This signature line appears to suggest the Licensee is holding out under Dumonde Financiere Canada Inc. However, the Licensee indicated on their ATR form that they will be holding themselves out as an unaffiliated agent. Additionally, it appears that Dumonde Financiere Canada Inc. is holding out as an "insurance brokerage" that has not been licensed with Council.
11. On April 18, 2024, the Licensing Department emailed the Licensee to confirm how the Licensee is holding themselves out, to provide Council staff with evidence that they have the authority to represent at least one insurer authorized to do business in British Columbia ("BC"), and that they hold E&O insurance coverage. The same day, the Licensee emailed Council staff a copy of their E&O insurance coverage.
12. On April 19, 2024, the Licensee responded to the Licensing Department's email dated April 18, 2024, explaining why they believe DuMonde Financiere Canada Inc. does not need to apply for an agency licence. According to the BC Registry, the name "DuMonde Financiere Canada Inc." was registered on March 6, 2024.
13. On April 26, 2024, the Licensee provided the Licensing Department with the insurer authorization letter from the new insurer. The Licensee also sent an email stating that "Dumonde Fina-----is incorporated, but the company is currently non-functional at this time" and that "insuranceprince.ca is a website designed solely for marketing purposes." They provided further clarification about how they hold themselves out and represent themselves to the public.
14. On April 29, 2024, the Licensee confirmed that they had removed "Dumonde Financiere Canada Inc. / Insurance Brokerage" from the insuranceprince website and stated the following: "I AM NOT AN AGENCY WHATSOEVER, I AM ONLY ONE MAN SHOW REPRESENTING MULTIPLE INSURANCE COMPANIES AUTHORIZED SELLING THEIR INSURANCE PRODUCTS."
15. The Licensing Department reviewed the Licensee's website (www.insuranceprince.ca) and noticed that the Licensee advertised home insurance and other products on their website even though the Licensee has never held a general insurance licence with Council.

16. On May 14, 2024, the Licensee provided the Licensing Department with an email response from FSRA stating that the Licensee's application was closed as the Licensee did not comply with the deficiencies in their application; specifically, the criminal background check from the US and confirmation of sponsorship from the new insurer.
17. On May 24, 2024, the Licensing Department emailed the Licensee stating that Council staff could not proceed to reactivate the Licensee's Life Agent licence at the staff level and that the Licensee would need to provide the following to have the Licensing Committee review the reactivation request:
 - Related court documents confirming the Licensee's conviction. If the court documents cannot be located, an FBI criminal record check should be provided.
 - A written explanation of the material misstatement made on the Licensee's original licence application received on March 28, 2023.
 - A written explanation as to why the Licensee is advertising home insurance products without a licence.
 - A written explanation regarding how the Licensee represented himself to the public when the Licensee held an active Life Agent licence.
18. On May 27, 2024, the Licensee provided the Licensing Department with a detailed explanation in response to the Licensing Department's May 24, 2024, letter. The Licensee elaborated on their lack of court documents for the US conviction. The Licensee also stated the following about advertising home insurance products without a licence: "I do NOT sell or conduct businesses related to home insurance only for referrals purposes. I have previously advertised home insurance so I can refer to my clients, some of my clients are homeowners and it's lot convenient getting the information through my website for a big savings purchasing their home insurance."
19. Between May 24, 2024, and June 21, 2024, the Licensing Department reached out to the Licensee to obtain the FBI criminal record check to have the Licensee's Life Agent licence suitability reviewed.
20. On June 11, 2024, the Licensee emailed the Licensing Department advising that:

"Truthfully, At the time of my insurance application with the BC Council, I DO NOT RECALL the relevant matters due to memory challenges diagnosed during my adolescence.

I only recently remembered these issues AND SPECIAL thanks to the help of my ex-wife and my adult children during multiple recent meetings, refreshing my memory of events that occurred over ten years ago.

Unfortunately, all court documents were shredded long ago, and I no longer have access to them.

Please accept my written statements and emails as an evidence, which I have authorized the BC Council to use.”

21. On June 20, 2024, the Licensee provided the Licensing Department with the FBI Criminal Record Check from the US, which states the Licensee was charged with fraud by wire, mail fraud and fraud by wire-radio or television on 08/12/2013. The sentence for the conviction was 30 months imprisonment and 36 months supervised release and restitution. When crossing the US border with his family in June 2014, the Licensee was picked up by U.S. Immigration and Customs Enforcement (“ICE”) and transferred to California for the outstanding charges. The Licensee could not recall whether they were in prison or jail but said they were detained during this time. The Licensee explained that this was a frightening experience where they were unaware of what was taking place and did as the officials told them. The Licensee recalls multiple court appearances and states they took advice from the court-appointed lawyer and pleaded guilty to the charges. According to the FBI Criminal Record Check, the Licensee was removed from the US on or about July 15, 2014, due to alien inadmissibility.
22. On June 27, 2024, the Licensing Department confirmed with the Alberta Insurance Council that the Licensee’s licence in Alberta was cancelled on April 3, 2024, due to non-renewal. They also confirmed that the Licensee had not submitted any new applications with them as of that date.
23. On July 16, 2024, the Licensing Committee met with the Licensee via video conference to discuss the report and to give the Licensee an opportunity to provide additional information or make further submissions concerning their suitability to hold a Life Agent licence.

SUBMISSIONS FROM THE LICENSEE AT THE LICENSING COMMITTEE MEETING

24. At the Licensing Committee (“Committee”) meeting, the Licensee advised they changed their name to Prince Martin Ola, effective May 23, 2024. The Licensee stated that they are part of a charitable organization that helps provide furniture and support to new immigrants. The

Licensee told the Committee that they had no intent to misstate their past criminal conviction, but due to a prior medical condition from his adolescence he has memory issues, and at the time of his licence application they could not recall that they had a criminal conviction and therefore they did not knowingly mislead or deceive Council on their licence application.

25. The Licensee advised that at the time of his licence application, it had been over 10 years since their conviction and that they could not remember what had happened. When questioned regarding the specific details of the criminal charge, the Licensee provided a vague description of two stores the Licensee owned that conducted money transfers worldwide. The Licensee stated that they were away at a wedding when their employees conducted transactions that were contrary to what they should have been doing, which resulted in the charges. It was not entirely clear to the Committee or Council what the transactions were and for what amounts. The Licensee stated that as the owner of the company, charges were brought against the Licensee even though his employees conducted the transactions.
26. The Licensee was asked if he had any medical records or documentation to support their claims relating to memory difficulties. The Licensee stated that they do not have any medical records to support this. The Licensee pointed out that Council's Suitability Policy relating to criminal convictions for indictable convictions or financial improprieties over \$5,000 states that "where five years have elapsed since the completion of these terms, such conduct generally will not bring a person's suitability into question if all other relevant factors are considered favourable" and stated that because their conviction was over 10 years ago, it should not reflect on their suitability to hold a licence. When questioned about the timeline of how the Licensee became aware of or eventually recalled the criminal record, the Licensee stated that the FSRA notified them of the criminal record in December 2023, but they did not believe this it was related to them as they could not recall the events in question. In March 2024, when Council staff asked the Licensee about the charge, the Licensee again stated they believed this was not related to them and advised Council staff that the charge was not related to them. The Licensee stated that it was only in April 2024, after the insurer terminated their contract, that they took steps to determine if the criminal conviction was related to them. The Licensee said they contacted their ex-wife, who helped them remember that they were involved in the criminal proceedings and that they openly admitted to the charges once they recalled them.
27. As part of their licence application package, the Licensee completed a Conflict of Interest Form – Request for Review of Other Business Activities dated April 4, 2023. In the form the Licensee stated "I work with Dumondes Management Services Inc. as an admin officer. My primary duty is

to ensure that the office runs efficiently on a day to day basis by responding to emails from clients and receive correspondences on behalf of the company. I do not have a supervisory or human resource role and I do not have direct and indirect authority over any employee.” When questioned at the Committee meeting about the Licensee’s role within the company, the Licensee advised that they are a “key stakeholder” and listed their duties as hiring, firing, training employees, accounting and designing the website. When specifically questioned about authority to hire or fire employees, the Licensee stated that they only have the ability to hire, and fire based on the company’s code of conduct.

28. Additionally, at the Committee meeting, the Licensee was asked how they are currently holding themselves out to the public, particularly as it relates to their website, www.insuranceprince.ca and the inclusion of DuMonde Financiere Canada Inc. in their email signature. The Licensee advised that the website was active and created when they were authorized to sell insurance products before their Life Agent licence became inactive. The Licensee advised that currently if an inquiry is received from the website, he will make a referral to an agency, where the Licensee’s proposed new supervisor holds an ATR. Additionally, the site links information about obtaining FHSA, RESP, TFSA, and RRSPs. The Licensee stated that he is not licensed to sell mutual funds but can provide some of these services as their Life Agent licence allows them to sell segregated funds. The Licensee further stated that DuMonde Financiere Canada Inc. does not conduct any insurance business and is only used for marketing. The Licensee was asked why at the time of the Committee meeting the www.insuranceprince.ca website still indicated that he is fully licensed in BC and Alberta, when their BC licence is inactive and their Alberta licence was cancelled on April 3, 2024. The Licensee explained that they still hold a valid Alberta licence but that they have not yet renewed it. When further pressed on the matter, the Licensee advised they were unaware that they are unable to represent that they are licensed in BC while holding an inactive licence and that their Alberta licence is not valid because they did not renew it. The Licensee stated they would remove this information from their website. At the time these reasons were written, the Licensee had removed reference to holding a valid Alberta insurance licence from their website.

ANALYSIS AND DETERMINATION

29. Based on the evidence before Council in this matter and the analysis that follows, Council has determined that the Licensee knew or ought to have known they had a criminal record in the US and therefore made a material misstatement in their original licence application. Council further concluded that the Licensee made a material misstatement in the Conflict of Interest

Form – Request for Review of Other Business Activities dated April 4, 2023. Additionally, the Licensee denied having a criminal record when asked by Council staff in March 2024, which Council finds to be another misstatement.

30. It is the Licensee’s responsibility to ensure that all licence applications and responses to Council are made truthfully and accurately. If Council was to believe that the Licensee had a medical condition that affected his recollection and memory, no evidence of which was provided to support such a claim, it does not remove the obligation of the Licensee to complete all forms to Council truthfully. It is the Licensee’s responsibility to ensure that all forms are completed accurately. If the Licensee was aware of a medical condition that may have affected their ability to answer the forms honestly, the Licensee should have taken the necessary steps to ensure the accuracy of those forms before making a declaration and completing the forms. Additionally, when asked in March 2024 about their criminal record, the Licensee denied the criminal conviction. If Council were to give the Licensee the benefit of the doubt relating to the medical condition, the Licensee did not take steps to ensure that their answers to Council were accurate and did not proactively seek help to recall the situation until after the termination of their contract with the insurer. It is imperative that licensees understand their regulatory obligations including responding honestly to Council inquiries.
31. Additionally, Council is concerned that the criminal charges the Licensee holds relate to fraud, and given the position that licensees hold with the public, it is paramount that all licensees are financially reliable and trustworthy. Council is of the opinion that the type of conviction the Licensee received is directly relevant to the suitability to hold an insurance licence. Council concluded that although the conviction was 10 years ago, there are many factors that tend to indicate the Licensee is not suitable to hold a licence, including the Licensee’s lack of accountability in admitting to the charges and their denial of involvement by stating that the criminal charges were only related to the activities of his employees.
32. Furthermore, from the evidence provided by the Licensee, it is evident that the Licensee is in a position of direct authority over employees in their other business activities; this is contrary to the Licensee’s declarations in the April 4, 2023, Conflict of Interest form where the Licensee stated “I do not have a supervisory or human resource role and I do not have direct and indirect authority over any employee.” Council found this to be another instance of the Licensee making a material misstatement.

33. Council was very troubled by the Licensee's lack of awareness of their professional and regulatory obligations. Council determined that the Licensee's website was misleading to the public, especially given that the Licensee advertised home insurance but has never held a general insurance licence.
34. Council was further troubled by the Licensee's statements at the Committee meeting that they still held a valid Alberta licence even though at the time of the Committee meeting the Licensee's Alberta licence had been cancelled. Council strongly believes that there is a risk to the public should the Licensee continue to hold a licence. Council has concluded that the Licensee is holding himself out in a manner contrary to how they are licensed, and that the use of DuMonde Financiere Canada Inc., is misleading as it misrepresents or misleads itself to be an insurance agency, but it has never been licensed as an insurance agency with Council.
35. Additionally, the Licensee did not advise Council of their name change within five business days pursuant to Council Rule 7(3)(d). Given the misrepresentations to Council and the misleading information presented to the public through the Licensee's website and email signature line, as well as the lack of awareness of their professional responsibilities, Council does not believe that the Licensee can carry on business as an insurance agent in good faith and in accordance with the usual practice of the business of insurance.
36. On that basis, according to s. 231(1)(a) and (c), Council concludes that the Licensee made material misstatements in the application for a Life Agent licence and that the Licensee likely would not have met the licensing requirements at the time their Life Agent licence was issued, due to the type of criminal conviction the Licensee has on their record. At present, given the multiple concerns noted above, Council concludes that the Licensee does not meet the current licensing requirements of Council Rule 3(2) and therefore their Life Agent Licence should be cancelled.
37. Prior to determining this matter, Council also considered past files in which It had reviewed the suitability of applicants with criminal charges and/or convictions that were not disclosed to Council.
38. *Wai Kiong Raymond Lee (2016)*: The licensee applied for a Life Agent licence on February 9, 2016. The licensee confirmed on his application that he had no prior criminal convictions or pending criminal charges to disclose. Council granted the licensee a Life Agent licence based on the licensee's disclosure and his undertaking to obtain a criminal record check from the Hong Kong

police as he had resided there in the previous five years. Council learned that the licensee had been convicted of a criminal offence in Hong Kong, which he had failed to disclose on his licence application and in subsequent discussions with Council staff. The licensee admitted that he intentionally did not disclose his prior criminal conviction to Council when he filled out his insurance application form as he feared Council would deem him unsuitable to hold a Life Agent licence. Prior to receiving the criminal record check from Hong Kong, he had never seen the document. He was aware that a copy had been sent to Council. After receiving a copy, he told Council's Review Committee that he contacted Council staff to discuss the document but did not provide any information to Council. At the time of his criminal conviction, the licensee was living in Hong Kong and moved there to assist a friend setting up a new business. On December 10, 2010, the licensee was convicted of two offences: (1) Possession of dangerous drugs and (2) Possession of pipe/equipment fit and intended for smoking/injecting/inhaling dangerous drugs. The licensee was sentenced to two months imprisonment suspended, on a 24-month probation. After being convicted, the licensee served the entirety of his sentencing in Hong Kong. The licensee told the Review Committee that he wanted to be a Life Agent because, prior to moving to Hong Kong, he was previously licensed with Council and was working at the same company he is currently at. The licensee stated that he always tried to do his work ethically and had not had any prior issues. The Review Committee believed that the licensee intentionally made a material misstatement to Council on his insurance application form by failing to disclose his prior criminal conviction, contrary to section 231(1)(c) of the Act. Council found the licensee's actions made him unsuitable to hold a Life Agent licence. Council concluded that the licensee's Life Agent licence be cancelled pursuant to sections 231 and 238 of the Act.

39. *Kulwinderpal Singh Khosah (2019)*: The licensee was first licensed with Council as a Level 1 General insurance salesperson ("Level 1 Salesperson") in April 2013 and held that licence until its termination for non-filing in August 2019. The licensee subsequently submitted a licence application to Council in October 2019 and became relicensed in November 2019. The licensee's licence became inactive in June 2020 until the licensee's licence was cancelled. On April 9, 2018, the licensee was convicted of assault and breach of undertaking or recognizance. On August 22, 2018, the licensee was convicted of a breach of undertaking or recognizance and breach of a probation order. On April 23, 2019, the licensee was convicted of assault, flight from police and breach of undertaking or recognizance. The licensee was licensed with Council at the time of all the above-noted convictions. However, he did not notify Council of any convictions, or the charges that preceded them, within five business days or otherwise, required by Council Rule 7(3)(a)(iv). When the Licensee submitted his licensing application to Council in October 2019, he

did not disclose any of the convictions and was brought to Council's attention in June 2020 when the insurance agency that had employed the licensee notified Council that they had been made aware of his April 2019 convictions. The licensee told Council's investigator that he did not disclose the convictions as he had received legal advice advising him that "no charges have been put through." The licensee declined to provide information to Council about the identity of the lawyer who had given him this advice, stating that the information had been provided confidentially. The licensee stated he had not been notified that he had been convicted and suggested that he had not been made aware of having been sentenced until the Court Services online information was pointed out to him by the Committee. The licensee admitted that he had not known about the notification requirements set out in Rule 7 and that he had little familiarity with the Code of Conduct. Council found the licensee not credible and did not consider the licensee's submission that he had been unaware of his various convictions to be believable, especially considering that the licensee acknowledged that the Court Services Online sentencing information was accurate and even confirmed that he had served jail time. Council found the licensee was not suitable to hold a licence and made an intended decision to cancel the licensee's licence with no opportunity to apply for an insurance licence for three years, fined the licensee \$5,000, required the licensee to complete the Council Rules Course and the Insurance Brokers Association of British Columbia's "Ethics for Insurance Brokers" course.

Intent to Make Order Under section 231(1) of the Act

40. Based on the foregoing, and after having considered the issue of urgency in the circumstances of this case, Council intends to make an order pursuant to section 231(1) of the Act, as follows:
 - a. that the Licensee's life and accident and sickness insurance licence be cancelled; and
 - b. that any application by the Licensee for an insurance licence will not be considered for a period of three years after the date of the order.
41. This determination corresponds to the step described in subsection 238(1)(a) of the Act.

Urgency and Order Under section 238(1) of the Act

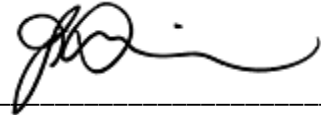
42. The rationale for issuing a decision under section 238(1) of the Act requires Council to consider whether the length of time that would be required to hold a hearing would be detrimental to the due administration of the Act. This is provided in subsection 238(1)(b). Therefore, the second step requires Council to consider whether there is urgency that would justify an order

under section 238(1) of the Act, that would come into effect immediately upon the issuance of the order to the Licensee.

43. Council is of the view that there is such urgency in this case, having regard to the following, that the Licensee has provided material misstatements to Council and that the Licensee is holding himself out in a manner contrary to the manner in which he is licensed.
44. The lack of accountability for the misstatements is demonstrative of disrespect for the regulatory process that governs the Licensee's conduct.
45. It is a fundamental requirement of any person who wishes to have the privilege of being licensed by Council to engage in insurance business activities to accept that Council will govern the person's conduct and that the person must respect and abide by the rules that govern the conduct of all licensees.
46. The "due administration of this Act," referenced in subsection 238(1)(b) of the Act, depends upon the honesty and trustworthiness of licensees, and Council cannot presently and going forward, depend on the honesty and trustworthiness of a licensee where it appears that the licensee has engaged in dishonesty or deception directed at Council while providing declarations, applications and responses to inquiries.
47. Council can only fulfil its statutory mandate as the professional regulatory body for insurance agents in the public interest if licensed insurance agents abide by the rules governing their conduct and respect Council's regulatory processes.
48. Given Council's concerns that it cannot depend on the honesty and trustworthiness of the Licensee, Council believes that a failure to make an order pursuant to section 238(1) of the Act in the circumstances of this case would result in unacceptable risks to the public interest, and that that would undermine public protection under the Act. Council has considered the serious impact of the order on the Licensee but is of the view that the adverse impact on the public interest if Council does not make the order outweighs the serious impact the order will have on the Licensee.

49. Based on all of the foregoing, Council considers that the length of time required to hold a hearing on this matter would be detrimental to the due administration of the Act. Therefore, Council is issuing an order pursuant to section 238(1) of the Act.

Dated in Vancouver, British Columbia, on the **14th day of August, 2024.**



Janet Sinclair, Executive Director
Insurance Council of British Columbia