

INSURANCE COUNCILS APPEAL BOARD OF ALBERTA

In the Matter of the *Insurance Act*, R.S.A 2000, c. 1-3, as amended

and

In the Matter of the *Insurance Agents and Adjusters Regulation*, Alta. Reg. 122/2001,
as amended and the *Certificate Expiry, Penalties and Fees Regulation*, Alta. Reg.
125/2001, as amended

BETWEEN:

MATTHEW FRASER

Appellant

- and -

LIFE INSURANCE COUNCIL

Respondent

Heard via video conference on April 14, 2022

Before:

Gwen Harris
Myrna Kwasnecha
Jason Zdyb

Appeal Panel Chair
Appeal Panel Member
Appeal Panel Member

Attending:

Matthew Fraser
Zabeda Yaqoob
* Personal
Information

Appellant
Respondent Counsel
Witness

Cindy Sewers

Court Reporter

DECISION AND ORDER

1. This is an appeal by Matthew Fraser (“the Appellant”) from the December 6, 2021 decision of the Life Insurance Council. The Life Insurance Council held that the Appellant failed to respond to a demand for information pursuant to section 481 of the *Insurance Act*. In respect of that failure the Life Insurance

* To protect the privacy of third parties, their personal information has been removed from the record in accordance with section 40(4) of the Freedom of Information and Protection of Privacy Act

Council imposed a penalty of \$750 pursuant to section 13(1) of the *Certificate Expiry, Penalties and Fees Regulation*.

Procedural History

2. The Alberta Insurance Council (the “AIC”) emailed the Life Insurance Council decision to the Appellant on December 9, 2021.
3. The Appellant commenced the appeal of the Life Insurance Council decision by notice to the Superintendent of Insurance dated January 7, 2022.
4. On January 14, 2022, the Superintendent of Insurance selected panel members from the Insurance Councils Appeal Board to hear the appeal. The Superintendent of Insurance confirmed the final selection of panel members on April 12, 2022.

Preliminary Matters

5. The Appellant attended the April 14, 2022 hearing via video conference. Ms. Yaqoob attended as Counsel on behalf of the Life Insurance Council.
6. The Appeal Panel Chair reviewed the jurisdiction of the Insurance Councils Appeal Board and outlined the hearing procedure.
7. The parties confirmed they had no objection to the constitution of the Appeal Panel and raised no objection to the Appeal Panel’s jurisdiction to hear and decide the appeal.
8. The Life Insurance Council conducted its review of this matter on a documentary basis. Prior to the hearing, the Appeal Panel received and reviewed the documents that constituted the record before the Life Insurance Council. The documents provided by the Life Insurance Council along with the Respondent’s written submissions received prior to the hearing are listed in the Appendix to this decision.

Issues to be Determined

- 9. Did the Appellant comply with the Alberta Insurance Council direction to provide the continuing education certificates for courses taken within the deadline specified?**
- 10. If not, is the penalty of \$750 imposed by the Life Insurance Council appropriate?**

Relevant Legislation

11. Section 481 of the *Insurance Act* provides authority for the Minister to direct an insurance agent to provide certain information. The provisions that are the focus of this appeal, sub-sections 481(1) and (2) provide:

481(1) The Minister may direct the holder or former holder of a certificate of authority to provide to the Minister within a reasonable period of time specified in the direction any information specified by the Minister relating to the matters in section 480(1).

(2) A person served with a direction under subsection (1) who has the information must provide the information in accordance with the direction.

12. Section 480 of the *Insurance Act* as referenced in section 481(1) allows, in part:

480(1) If the Minister is satisfied that the holder or a former holder of a certificate of authority

...

(b) has contravened any provision of this Act or the regulations ...

the Minister may revoke, suspend or refuse to renew or reinstate one or more of the certificates of authority held by the holder, impose terms and conditions provided for in the regulations on one or more of the certificates of authority held by the holder and impose a penalty on the holder or former holder.

(2) The amount of a penalty imposed under subsection (1) is governed by the regulations.

13. For the purposes of this appeal, the requirements for the completion of continuing education and the maintenance and submission of records of courses completed are addressed in the *Insurance Agents and Adjusters Regulation* (the "*Regulation*") as follows:

30(1) An individual or a sole proprietor who holds

(a) a life insurance agent's certificate of authority,

(b) an accident and sickness insurance agent's certificate of authority,

...

must complete in each certificate term at least 15 hours of the continuing education courses approved under section 29 with respect to the certificate of authority.

...

(9) Notwithstanding anything in this section, where an individual or sole proprietor applies for and obtains a new certificate of authority

- (a) in the 3 months preceding the expiry date for that certificate, the individual or sole proprietor need not complete the continuing education required under this section for the certificate term, or
- (b) when there is more than 3 months remaining before the expiry date for that certificate, the individual or sole proprietor must complete the number of hours of continuing education calculated in accordance with the following formula:

$$\frac{A \times C}{B}$$

where

A is the number of months remaining in the certificate term;

B is 12 months;

C is 15 hours.

31(1) An individual who holds a certificate of authority must keep a record issued by a continuing education provider respecting the continuing education courses completed by the individual during that certificate term.

(2) The records must be kept for a period of 3 years following the expiry of the certificate term and must be provided to the Minister upon request.

(3) If the individual does not provide the records within 30 days after receiving a request from the Minister, the certificate of authority is suspended until the demand is complied with.

14. Section 13 of the *Certificate Expiry, Penalties and Fees Regulation* authorizes the imposition of the financial penalty that is the subject of this appeal as follows:

13(1) For the purposes of section 480(2) of the Act, the amount of the penalty that may be imposed may not exceed the following:

...

(b) \$1000 for a matter referred to in section 480(1)(b), (c), (d) or (e) of the Act.

Submissions

15. In written and oral submissions, Counsel for the Life Insurance Council presented the position of the Council as follows:

- a. All certificate holders are required to demonstrate completion of 15 hours of approved continuing education courses for each class of license being renewed, by entering all approved courses under their profile. All are required to keep a copy of the course certificates for 3 years and must provide a copy of those records when requested.

- b. The AIC conducts random audits to determine that certificate holders are in compliance with the continuing education requirement.
- c. Failure to provide the certificates demanded constitutes an offence under section 480(1)(b) of the *Insurance Act*. Offences under this provision are public welfare offences that attract strict liability.
- d. Neither intention, inexperience nor preoccupation with other matters is a defense to a strict liability offence. The Appellant's decision not to renew his certificates is not a relevant consideration.
- e. In emailing the Demand on August 23, 2021 to the address provided by the Appellant, the Alberta Insurance Council provided proper notice. It is the Appellant's obligation to monitor his email. There is no requirement for service by registered mail.
- f. There is no dispute that the Appellant failed to provide copies of the continuing education certificates covering 30 hours of continuing education credits as identified in the Demand within the 30-day time period.
- g. The Appellant did not take all reasonable steps to avoid violating the requirement to provide the CE certificates within 30 days.
- h. On October 18, 2021 and November 10, 2021, the Appellant provided a partial response to the Demand.
- i. The civil penalty of \$750.00 is in line with precedent decisions of the Life Insurance Council, whereby an individual fails to respond by the Demand deadline but later provides a partial response.

16. The Appellant testified as follows:

- a. He admits to not submitting the continuing education certificates within 30 days.
- b. He quit the insurance business in the middle of July and was not working in the insurance office when the Demand was sent.
- c. He did not see the Demand or the reminders that were sent to a Hotmail account because they went to junk mail.
- d. Serving notice by email is an unprofessional way to deal with such a serious matter.

- e. He tried to get information from the insurance council but had difficulty understanding the staff.
- f. Because all of his continuing education courses were done on his employer's computer, he did not have access to the information once he stopped working in the business.
- g. He had been assured by experienced agents that his licensing credits would be carried forward from the completion of his LLQP (Life License Qualification Program) course.
- h. He was able to produce certificates for 29.5 of the requested 30 credits.
- i. A \$750 fine is unreasonable. The fine is meant to prevent fraud and as he didn't falsify anything and was just unable to access the information, the fine seems unfair.

17. In response to questions, the Appellant provided the following information:

- a. He provided the email address on his AIC profile.
- b. The only information he provided prior to the September 21, 2021 deadline was the information on the login portal.
- c. He did not provide continuing education certificates by the deadline.
- d. He formally quit working at Sun Life in mid-July. He does not know who notified the AIC in September 2021 that he was resigning his licenses.
- e. He started working with Sun Life in March 2021 as an associate advisor performing simple tasks for another agent's clients.
- f. His first contact with AIC was September 20, 2021.

18. The AIC compliance investigator testified:

- a. Section 30(9)(b) of the *Regulation* applies to the Appellant's case.
- b. The licensing period for which the Appellant was responsible for submitting continuing education certificates is March 15, 2021 to June 30, 2021.

- c. As Licensing (the licensing department of the AIC) calculates partial months as whole months, the formula set out in section 30(9)(b) results in the Appellant needing to submit 5 continuing education certificates for each certificate of authority.
- d. The Appellant provided the required continuing education certificates for the Accident & Sickness certificate of authority on October 12, 2021. He did not submit the required number of certificates for his Life certificate of authority.
- e. Had the Appellant submitted the LLQP certificate, he would have met the requirement.

Documentary evidence

- 19. The screen shot of the AIC Webpage included in the written submissions the Life Insurance Council shows Ongoing Education Requirements for Resident Agents to be 15 hours of continuing education credits for the period beginning July 1st and ending June 30th as a condition of renewing their certificate of authority. The Website states “All certificate holders are required to have 15 hours of credits per certificate for the first reporting period. It also indicates that random audits are conducted to determine that certificate holders are in compliance with these requirements and that certificate holders must keep a copy of their continuing education certificates issued by a continuing education provider for a period of 3 years.
- 20. Included in the information filed with the Appeal Panel was a copy of the request for information (the Demand). The Demand sent August 23, 2021 to the Appellant’s email address from system@abcouncil.ab.ca states:

By way of delegation granted by the President of Treasury Board and Minister of Finance, the Alberta Insurance Council (the “AIC”) is the body responsible for the licensing and regulation of insurance agents, brokers and independent adjusters in the Province of Alberta. Under that mandate, the AIC oversees the professional market conduct of all licensees, including the review of any alleged violations of the Alberta *Insurance Act*, R.S.A. 2000, Chapter I-3 (the “Act”), and its Regulations.

You have been randomly selected for AIC’s CE audit. The CE requirements for agents and adjusters are established, in part, by s 30(1) of the *Insurance Agents and Adjusters Regulation*, AR 122/2001 (the “Regulation”) which states that:

30(1) An individual or a sole proprietor who holds

- a) a life insurance agent’s certificate of authority,
- b) an accident and sickness insurance agent’s certificate of authority,
- c) a general insurance agent’s certificate of authority, or
- d) an adjuster’s certificate of authority

must complete in each certificate term at least 15 hours of the continuing education courses approved under section 29 with respect to the certificate of authority.

Accordingly, to confirm your compliance with the Regulation, please forward your CE certificates for all declared courses in the 2020/2021 certificate term (July 1, 2020 to June 30, 2021) for each class of certificate of authority (license) by email to audits@abcouncil.ab.ca. In your email, please attach all CE certificates as a single pdf document and include "CE Audit", along with your CIPR number, in the subject line.

This letter is a formal demand. Pursuant to sections 481(1) and (2) of the Act, R.S.A. 2000, chapter I-3, and amendments thereto, you are required to respond to this demand. Failure to respond to this demand within 30 days constitutes an offence under s 481(2) of the Act, and s 31(3) of the Regulation, and will result in an automatic suspension of your certificate(s) of authority until the documents substantiating your declared CE courses have been provided. Individuals that have more than one license may face multi-disciplinary actions in relation to each license.

If you have any further questions, please forward them to audits@abcouncil.ab.ca or click this link for information.

Discussion and Reasons

21. As set out in section 30 of the *Regulation*, certificate holders are required to participate in approved continuing education courses during each certificate term. The *Regulation* requires that the certificate holder maintain a record of participation in the courses for three years and to provide the certificates from the courses upon request.
22. In the context of the legislated requirements, the AIC requires certificate holders to document the continuing education courses taken in the certificate term on the AIC Licensing Portal. It is the practice of the AIC to conduct an audit of the information documented by a random selection of certificate holders. The Appeal Panel understands that certificate holders to be audited are selected by a computer program. The selected certificate holders are notified by email sent to the address on record that they must submit to the AIC proof in the form of completion certificates of the courses they documented on the AIC Licensing Portal.
23. The record shows the Appellant held certificates of authority for Life and Accident & Sickness from March 15, 2021 to June 15, 2021. The License History, included in the record provided to the Appeal Panel, indicates the Appellant renewed the certificates effective June 15, 2021 and that the certificates terminated on September 7, 2021. In correspondence dated September 7, 2021 to the AIC, the Appellant's employer advised of the voluntary resignation of the Appellant for undisclosed personal reasons.
24. It was the Appellant's evidence that he resigned from his position at the insurance agency and stopped working in the industry in the middle of July 2021.

25. The record includes the ‘Demand for Information’ the AIC emailed to the Appellant’s email address on August 23, 2021. As set out earlier in this decision, the Demand for Information quoted that portion of section 30 of the *Regulation* that requires certificate holders to complete 15 hours of continuing education courses for each certificate of authority. It directs the recipient to forward continuing education certificates for all declared courses in the 2020/2021 certificate term (July 1, 2020 to June 30, 2021) for each class of certificate of authority by email to audits@abcouncil.ab.ca within 30 days.
26. The record also documents the reminders sent to the Appellant’s email address on September 7, 2021, September 13, 2021 and September 20, 2021. The September 13 and 20th reminders identified September 21, 2021 as the due date for submission of the certificates.

Compliance with AIC Demand

27. Although the Appellant asserts that he resigned his position with his employer in the middle of July 2021, his employer did not notify the AIC of the resignation until September 7, 2021. In any case, on August 23, 2021 when the demand for proof of continuing education credits was sent to the Appellant’s email address, the Appellant was either a “holder or former holder of a certificate of authority” for purposes of section 480 and 481 of the *Insurance Act* and was thus captured by the legislated requirement to submit the requested documentation.
28. The evidence as to proper notice is as follows:
- a. The Appellant confirmed that the email address to which the AIC sent the demand for records of continuing education courses was the address he provided to the AIC.
 - b. The Appeal Panel acknowledges and finds plausible, given the general email address from which the demand notice was sent, the Appellant’s claim that he did not see the emailed demand notice or reminders until September 20, 2021 because they went into his junk mail. As well, we note and have some sympathy for his contention that he was not properly served with the AIC demand notice and that a verifiable method of notification should be used given the serious consequences of noncompliance. However, as there is no legislated requirement for service by post or registered mail of this category of demand for information and the evidence before the Appeal Panel does not indicate the AIC demand notice was not delivered to the email account provided by the Appellant, the Appeal Panel accepts that the demand notice was sent to the Appellant.

29. In light of the evidence, the Appeal Panel is satisfied that the AIC notified the Appellant of the requirement to submit documentation within 30 days.
30. As it is undisputed that the Appellant did not submit the requested documentation prior to the September 21, 2021 deadline, the Appeal Panel finds that the Appellant failed to comply with the AIC's demand for continuing education certificates.
31. A failure to comply with the demand as authorized in section 481 of the *Insurance Act* and section 31(2) of the *Regulation* is categorized as a regulatory or public welfare offence that attracts strict liability. In the present case, this means that once the failure to comply with the demand for records is established, liability is avoided only if the Appellant can establish on a balance of probabilities that he was diligent in taking all reasonable steps to prevent the failure to comply with the demand.
32. We acknowledge the Appellant's submissions that once he learned of the requirements, he tried to get the information but he had difficulty obtaining the certificates because the information was stored on the insurance agency's computer which he no longer had access to.
33. However, neither intention nor access difficulties are a defense to a strict liability offence. The offence is limited to the Appellant's failure to provide the information demanded within the specified time as authorized by the *Regulation*.
34. While it is understandable that once the Appellant left the insurance business after a very short period in the industry during which he helped another agent and did not have clients of his own, he may not have paid close attention to ongoing obligations related to his licensing. However, the reference in the *Regulation* to former holder of a certificate of authority and to keeping up to 3 years of records clearly signals that the obligation to respond and report persists beyond the individual's decision to no longer work in the insurance industry.
35. The evidence before the Appeal Panel does not show the Appellant took steps to comply with the demand to submit the proof of continuing education courses to the AIC by September 21, 2021.
36. Thus, the Appeal Panel finds on the evidence that the Appellant did not exercise the diligence necessary to excuse his failure to comply with the demand to submit the required documentation prior to the deadline.

37. On the first issue, the Appeal Panel concludes that the Appellant did not comply with the AIC demand in accordance with the legislated requirements.

Penalty

38. The *Certificate Expiry, Penalties and Fees Regulation* allows for a penalty of no more than \$1000 for violations that include failing to pay a premium collected to an insurer, placing insurance with an unlicensed insurer and demonstrating incompetence.
39. This case involves a contravention of section 480(1)(b) of the *Insurance Act*. Specifically, the Appellant did not comply with the direction to provide completion certificates for continuing education courses demanded in accordance with section 481(2) of the *Insurance Act* and section 31(2) of the *Regulation*.
40. The demand notice sent to the Appellant's email address quotes section 30(1) of the *Regulation* which directs that certificate holders are required to complete 15 hours of continuing education courses for each certificate. While the demand notice does not specifically direct the Appellant to provide certificates for 30 hours of continuing education courses, given the 30 hour requirement was the only provision quoted, it is reasonable that the Appellant understood he had to account for 30 credits. With that understanding he sought and was eventually able to submit certificates for 29.5 credits.
41. The Appeal Panel notes that the screen shot submitted of the AIC website also directs that all certificate holders are required to have 15 hours of credits per certificate for the first reporting period.
42. This expectation of having to submit certificates for 30 hours of continuing education courses persisted up to the hearing. The written submissions of the Life Insurance Council noted:
- In order to comply with the Demand, Mr. Fraser was required to provide copies of CE certificates covering 30 hours of CE credits (15 hours for Life and 15 hours for Accident & Sickness).
43. As confirmed in the course of the hearing, the provision in the *Regulation* applicable to the Appellant was section 30(9)(b) because the Appellant had new certificates of authority for only 4 months rather than a full year. An agent qualifying under this section must complete 5 hours of continuing education per certificate rather than 15 hours.
44. The Appeal Panel is of the view that the Appellant was significantly disadvantaged in trying to comply with the demand given the information

provided to the Appellant as to the requirement to be met was both inaccurate and misleading.

45. Having found the Appellant guilty of violating sections 481(2) and 480(1)(b) of the *Insurance Act*, the Life Insurance Council imposed a civil penalty of \$750.
46. Counsel argued that the \$750 civil penalty imposed is appropriate and in line with the precedent decisions of the Life Insurance Council whereby an individual fails to respond by the demand deadline but later provides a partial response.
47. The Appeal Panel disagrees. The present case is distinguishable from the cases submitted that involved insurance agents.
48. One of the cases submitted as a precedent involved an insurance agent, acknowledged in the Life Insurance Council decision as a former agent, with considerable experience and lengthy service in the industry. The inclusion of the following statement in the Life Insurance Council decision suggests that the demand for the record of continuing education courses for a two year period was related to a complaint.

In terms of the applicable sanction, the public relies on the AIC to investigate complaints, and the Act requires that all current and former certificate holders provide all of the necessary information when called upon. The public is not well-served when an agent fails to comply with a demand, like those made in this case.

49. The other case referenced involved an insurance agent with a number of years of experience in the industry. Although referred to in the Life Insurance Council decision as a former holder of certificates of authority, the decision indicates that on failing to comply with the demand for the record of continuing education courses, this agent's certificates were suspended which indicates he held active certificates. Further, the information from the agent as quoted in the decision suggest the agent was still active inasmuch as he was moving his office.
50. In the present case, the Appellant worked in the industry assisting another agent for a mere 4 months. He was included in the AIC audit process as a former holder of certificates of authority. There is no indication that he was included in the audit process as a result of a complaint or that he had active certificates subject to suspension.
51. While a civil penalty of \$750 may be appropriate in cases of partial compliance in the circumstances of the cases submitted as precedents, the Appeal Panel does not agree that this level of penalty is appropriate in the circumstances of this case.

52. In light of the Appellant's very limited engagement as an insurance agent and the confusion as to the requirement he had to meet as a result of the misleading information provided, the Appeal Panel concludes that a civil penalty of \$100 is appropriate.

Appeal Fee

53. Section 24 of the *Insurance Councils Regulation* provides that, in determining an appeal, a panel shall also determine the disposal of the appeal fee paid by the Appellant to commence the appeal to one or both of the parties taking into consideration both the results of the appeal and the conduct of the parties. Given the results of the appeal, the Appeal Panel is of the view that the appeal fee paid by the Appellant should be allocated in equal portions to the Appellant and the Life Insurance Council.

Order

54. For the reasons set out above, it is ordered that:

- a. The December 6, 2021 Decision of the Life Insurance Council is varied to the extent that the civil penalty assessed by the Life Insurance Council is reduced to \$100.
- b. The appeal fee is awarded in equal portions to the Appellant and the Life Insurance Council.


DATED at Edmonton, Alberta this 17th day of May 2022.

INSURANCE COUNCILS APPEAL BOARD OF ALBERTA

Per: 

Gwen Harris – Appeal Panel Chair

Authorized to sign for:

Per: 

Myrna Kwasnecha – Appeal Panel Member

Per: 

Jason Zdyb – Appeal Panel Member

APPENDIX

1. Documents submitted by the Life Insurance Council – February 24, 2022
 - a. Investigation Report to the Life Insurance Council – October 4, 2021
 - b. Alberta Insurance Council License History
 - c. Letter dated September 7, 2021 to the Alberta Insurance Council from Contracting and Licensing, Sun Life Assurance Company of Canada
 - d. Demand for Information emailed to the Appellant on August 23, 2021 from Director of Compliance, Alberta Insurance Council
 - e. Reminder re: Demand for Information emailed to the Appellant on September 7, 2021 from Director of Compliance, Alberta Insurance Council
 - f. Reminder re: Demand for Information emailed to the Appellant on September 13, 2021 from Compliance Team, Alberta Insurance Council
 - g. Reminder re: Demand for Information emailed to the Appellant on September 20, 2021 from Compliance Team, Alberta Insurance Council
 - h. Email dated September 20, 2021 to 'Audits' from the Appellant
 - i. Screen shot A & S Jul 01 2020 – Jun 30 2021
 - j. Screen shot LIFE Jul 01 2020 – Jun 30 2021
 - k. Emails dated September 20, 2021 between the Appellant and Compliance Team
 - l. Copy of Canada Post Xpresspost label
 - m. Email dated October 4, 2021 to the Appellant from Alberta Insurance Council Director of Compliance
 - n. Email dated October 12, 2021 to Director of Compliance from the Appellant
 - o. Email dated October 18, 2021 to Director of Compliance from the Appellant
 - p. Continuing Education Certificate – The EDGE Certification, June 15, 2021
 - q. Continuing Education Certificate – EDGE's Natural Markets & Prospecting, June 15, 2021
 - r. Continuing Education Certificate – Solutions For Business Expenses, June 8, 2021
 - s. Investigation Report to the Life Insurance Council, signed by Appellant October 18, 2021
 - t. Continuing Education Certificate, Sun Life Assurance Company of Canada – 2021 Compliance, March 23, 2021
 - u. Continuing Education Certificate, Sun Life Assurance Company of Canada – Financial crime awareness 2021, March 23, 2021
 - v. Continuing Education Certificate, Sun Life Assurance Company of Canada – SunSpectrum Term, March 23, 2021

- w. Continuing Education Certificate, Sun Life Assurance Company of Canada – Needs based selling, March 24, 2021
- x. Continuing Education Certificate, Sun Life Assurance Company of Canada – Sun Critical Illness Insurance, March 24, 2021
- y. Continuing Education Certificate, Sun Life Assurance Company of Canada – SunSpectrum Permanent Life II, April 14, 2021
- z. Continuing Education Certificate, Sun Life Assurance Company of Canada – Boost your brand in the digital age, June 15, 2021
- aa. Undated letter to “The Council” from the Appellant
- bb. Emails between the Appellant and Alberta Insurance Council Director of Compliance dated October 4, 2021, October 12, 2021, October 18, 2021 and October 22, 2021
- cc. Letter dated December 9, 2021 to the Appellant from Director of Legal and Regulatory Affairs, Alberta Insurance Council
- dd. Life Insurance Council Decision, December 6, 2021
- ee. Letter dated January 7, 2022 – To whom it may concern from the Appellant
- ff. Emails between the Appellant and Alberta Insurance Council Compliance Administrator dated October 4, 2021, October 12, 2021, October 18, 2021, October 22, 2021, November 10, 2021 and November 12, 2021
- gg. Official Transcript, December 22, 2021 – Advocis
- hh. Continuing Education Certificate, RBC Life Insurance Company, Why and how to sell disability insurance, June 8, 2021
- ii. Continuing Education Certificate, RBC Life Insurance Company, Divin Deeper with sales solutions, June 8, 2021
- jj. Continuing Education Certificate, RBC Life Insurance Company, Application and Underwriting process, June 14, 2021
- kk. Letter dated February 2, 2022 to CEO Alberta Insurance Council from Manager of Compliance of Insurance Regulations and Market Conduct, Alberta Treasury Board and Finance

2. Written Submissions of Life Insurance Council with exhibits:

- A. Reported continuing Education Courses
- B. Timeline – Production of CE Certificates
- C. Decision of the Insurance Councils Appeal Board of Alberta issued October 2, 2018
- D. Screen shot – Appellant Profile
- E. Decisions of the Life Insurance Council issued August 14, 2020 and July 28, 2020
- F. Book of Authorities:
 - 1. Section 480(1)(b), *Insurance Act*, RSA 2000, c.1-3
 - 2. Section 481, *Insurance Act*, RSA 2000, c.1-3

3. Section 31, *Insurance Agents and Adjusters Regulation*, AR 122/2001
4. Ongoing Education Requirements – Alberta Insurance Council Webpage
5. Section 30(1), *Insurance Agents and Adjusters Regulation*, AR 122/2001
6. Para. 29, *R. v Sault Ste. Marie*, [1978] 2 SCR 1299
7. Para. 66, *R v Sunshine Village Corporation*, 2010 ABQB 493
8. Para. 30, *Levis (City) v Tetreault*, 2006 SCC 12