ALBERTA INSURANCE COUNCIL (the "AIC")

In the Matter of the *Insurance Act*, R.S.A. 2000, Chapter I-3 (the "Act")

And

Keely Janzen (the "Agent")

DECISION OF The Life Insurance Council (the "Council")

This case involves an allegation pursuant to s. 509(1)(c) of the Act. It is alleged that the Agent, on one (1) occasion, allowed other agents to log in to her insurance company sponsor's application account and submit a life insurance application on her behalf with varying false client information and without the knowledge or consent of the client. In so doing, it is alleged that the Agent is guilty of engaging in any unfair, coercive or deceptive act or practice, as contemplated by s. 509(1)(c) of the Act, and subsequently violated s. 480(1)(b) of the Act.

Facts and Evidence

This matter proceeded by way of a written Report to Council prepared on October 9, 2024 (the "Report"). The Report was forwarded to the Agent for review and to allow the Agent to provide the Council with any further evidence or submissions by way of Addendum. In arriving at its conclusion, the Council carefully reviewed all evidence presented.

The Agent held Life and Accident & Sickness certificates of authority, periodically, from October 5, 2022, to July 13, 2023.

This matter arose in response to a complaint received by the AIC, on February 17, 2023, from [R.H.] [redacted] and [S.H.] [redacted] (hereinafter the "Complainants"), relating to the conduct of [A.I.L.I.C.] [redacted] (hereinafter the "Sponsor"):

[...]

My wife, [S.H.] [redacted] (hereinafter "Client 1"), works at [P.T.A.] [redacted].

That company is associated with [the Sponsor] [redacted]; they contacted us over a year ago asking if we need insurance from them. We mentioned we already had coverage [...] but that we would like to compare their policies with our current ones [...]]. We had a zoom meeting with 3 representatives from [the Sponsor] [redacted] in September 2022. We didn't agree to any policy. We didn't give any banking information. We didn't give our SIN. We didn't give our driver's license numbers. [...]. We let [the Sponsor] [redacted] know that we would not be pursuing any coverage with them, however

since then we have received numerous physical mail [sic] showing what appears to be approved insurance policies with [the Sponsor] [redacted]. Things recently are starting to get weird, and have crossed the line into fraud I'm pretty sure.

Have a look at the attached document where they've made up Social Insurance Numbers and drivers [sic] license numbers for both [Client 1] [redacted] and I, and even forged our signatures. They have our kids [sic] names on the document as well. The document looks like it is designed to fool us into signing on with them. The document has our false personal information (drivers [sic] license number, forged signatures, fake SIN etc.) We've asked them to stop sending us any more mail and remove our contact info from their mailing lists. This isn't working. Can you help us? [...]

On February 23, 2023, the AIC investigator requested additional information from the Complainants:

[...]

- Any/all correspondence with [the Sponsor] [redacted] and their agents/affiliates; and,
- Any/all documents mailed to you by [the Sponsor] [redacted] regarding this matter; and,
- Quotes provided to you; and,
- A copy of your driver's licenses; and,
- Any other documents you feel may help my understanding of the material facts

[...]

On February 24, 2023, the Complainants provided the AIC investigator with the following information:

[...]

Thank you for helping us get this [Sponsor] [redacted] situation resolved. Our end goal is: We don't want to hear from them again and we are glad you are seeing the mail they are sending us as I'm sure that something very unusual is happening (fake SIN's, fake drivers [sic] license numbers, erroneous typos with our mailing address, phone numbers etc.)

Feel free to contact us at any time. As I've stated earlier, we did not sign up with [the Sponsor] [redacted]. We just want their physical mail to stop (a request by us which has gone ignored by them) and we want to ensure our privacy is protected. Attached are the PDF's of all the physical mail we've received and our drivers [sic] licenses. That's pretty much it as far as communication goes that we have received.

[...]

On April 25, 2023, the AIC investigator received a letter dated April 20, 2023, from the Sponsor, which provided, in parts

in part:

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[...]
RE: Case#[redacted], Keely Janzen
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[...],

Thank you for your letter, outlined here, are responses to the questions listed in your letter regarding [the Complainants] [redacted].

[The Sponsor's] [redacted] procedures surrounding docusigned document verification.

DocuSign signing software is integrated into [the Sponsor's] [redacted] electronic application software. During the application process, the agent obtains an email address from the customer. This email address is used to send the customer application forms for review and signature. After the customer reviews and completes the application by electronic signature, a DocuSign signature certificate is sent as verification to the Company.

Relationship between [redacted], and [A.H.H.C.] [redacted]

[...] These agents are independently contracted with [the Sponsor] [redacted]. [...]. [A.H.H.C.] [redacted] is used as an internal policy routing reference for Alberta.

Confirmation of the applications received for the complainants including how and when and DocuSign certificate of completion.

[The Sponsor] [redacted] received four applications for [the Complainants] [redacted] dated September 30, 2022, two applications dated October 17, 2022 and October 18, 2022. After review, we determined the personal information provided by agent [redacted] for [the Complainants] [redacted] applications was inaccurate. All policies issued for [the Complainants] [redacted] have been null and void, and all collected premiums have been credited to the bank account listed on the applications. The DocuSign certificates for each application are attached.

[...]

Any agent of record changes to change policies to [A.H.H.C.] [redacted]

There were no changes regarding the agent on record for these policies. [...]. Our records also show Keely Janzen is an agent on record for policy number *****224 [redacted] (hereinafter the "Policy").

Any other information or documents you feel may be relevant

Upon further review of the applications for [the Complainants] [redacted], it appears that agent [redacted] provided inaccurate information for these applications. This included Social Insurance, driver's licenses, and phone numbers. The email address used to complete the DocuSign is also not valid. The inaccurate information provided by agent [redacted] indicates that electronic signatures were completed by agent [redacted], not by [the Complainants] [redacted].

Thank you for bringing this to our attention, we take the issue of agent misconduct very seriously. We have contacted the agents of record since receiving your letter to find out precisely what occurred. The Company is in the process of taking appropriate disciplinary action, which will likely include the termination of [redacted] agent agreement. We are also reviewing association of [redacted] and Keely Janzen regarding the solicitation of the policies listed in your April 3, 2023, letter.

[Emphasis added in original document]

On April 25, 2023, the AIC investigator also received a copy of the Policy from the Sponsor which contained, in

part, the following information:

- Policy Number: *****224 [redacted]
- Date: October 18, 2022
- Name: [Client 1] [redacted]
- Driver's License: *****25 [redacted]
- Email of Client 1 sk*****@gmail.com [redacted]
- DocuSign Email: ro*******12@gmail.com [redacted]

On April 29, 2023, the Agent responded to the AIC investigator, with the following information:

[...]

There has never been any communications [sic] between myself and [Client 1] [redacted] all I knew is I needed a coded sale to activate my contract. I was not present and unaware of the sale taking place at the time of signing. [...]

^[...]

On June 8, 2023, the AIC investigator requested additional information from the Agent:

[...]

- Any communication you received regarding your code being activated with [the Sponsor] [redacted]
- Any communication you received regarding the submission and/or issuing of the policy to the [the Complainants] [redacted].

[...]

On June 23, 2023, the Agent provided the AIC investigator the following additional information:

[...]

Regarding the communication of my code sale being activated with [the Sponsor] [redacted], I received a congratulations email on my first sale although I had made a couple sales by then so there's no way to know which sale this correspondent [sic] to. I never received any info on the submission or issuing of the policy. This was done without my knowledge. i [sic] did receive an email notification that the phone number on [the Complainants'] [redacted] application was incorrect. Since their names were not familiar and I was new with the company, I did not respond thinking that the email was sent to me in error. My understanding was that [the Complainants'] [redacted] policy was cancelled and the initial premium was refunded to the account on file. [...]

On September 8, 2023, the Agent provided the AIC investigator with the following information:

[...]

Attached are the copies of the emails you requested in your letter: First attachment – Congratulations email after Submission of First Application. Initially, I was not able to locate this letter, however [the Sponsor] [redacted] provided me with the copy of the email that would have been sent to me on October 24, 2022. Second attachment – Email notification that [the Complainants'] [redacted] phone number listed on application was incorrect. [...]

On September 19, 2023, the Agent provided the AIC investigator the following documents:

- 1. Congratulations Email dated October 24, 2022 (the "Congratulations Email"), and
- 2. Verification Call Email dated October 24, 2022 (the "Verification Call Email").

The Congratulations Email stated:

[...] Dear Keely,

Congratulations on submitting your first application!

Along with this message is our applause and gratitude — good job!

You are now one step closer to enjoying the best that *Opportunity Unlimited* has to offer. Your production counts towards qualifying for the World's Greatest Bonus as well as membership in the Founder's Club, President's Club, the Million Dollar Club, and for the annual Convention! You are also now eligible to start receiving incentive payouts via our Pinnacle Recruiting Club.* And don't forget the ultimate prize: lifetime renewals once you have met the terms of your contract.

I look forward to charting your future progress. Keep up the great work. Good luck and good selling! [...]

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The Verification Call Email stated:

[...] Date: Mon, Oct 24, 2022 at 3:13 PM Subject: [AO] Verification Call Result: [CLIENT 1] [redacted] : [Policy] [redacted] [...]

Home Office has attempted to make a verification call for the above policy number, but the number on file is either incorrect or not in service.

Please provide an alternative number to reach the applicant

at [email] [redacted] or [email] [redacted] no later than Oct 27 2022 6:10AM or a NOPRD/NOADV will be added to the policy.

Thank you.

On December 4, 2023, the Agent provided the AIC investigator the following information:

[...]

below are my responses to your questions:

1. You mention needing a coded sale, can you explain what this means? Why do you need a code to start? You mention making sales around the same time, so would that business not have adequate [sic] to activate your code?

a. You mention needing a coded sale, can you explain what this means?

 \cdot The reference to a "code" sale is an internal jargon word used for the first sale made by a new agent.

b. Why do you need a code to start?

 \cdot An agent does not need a code to start. The first application written ("code") activates the agent's contract with [the Sponsor] [redacted].

c. You mention making sales around the same time, so would that business not have adequate [sic] to activate your code?

· Yes, any application would have been adequate to code.

2. You mention not being present or knowing at the time, how did you find out that this application went in? How was it submitted on your behalf? Could you explain your systems?

a. You mention not being present or knowing at the time, how did you find out that this application went in?

· I learned that the application went in under my name when the Alberta Insurance Council contacted me.

b. How was it submitted on your behalf?

· I don't have any direct knowledge about how this application was submitted on my behalf.

c. Could you explain your systems?

 \cdot Applications are completed and signed electronically through the software provided by [the Sponsor] [redacted]. Completed and electronically signed applications are transmitted to [the Sponsor] [redacted] for processing.

[...]

[Emphasis added in original document]

On December 14, 2023, the AIC investigator sent a request for information to the Sponsor, requesting the following:

[...]

- 1. What is your standard process for the submission of applications? (please be specific)
- 2. How does [the Sponsor] [redacted] identify which agent submits the application? If it uses Identifying codes for the agents, how and when are those assigned?

- 3. Please provide [R.B] [redacted] and [R.A.'s] [redacted] interviews/investigation file related to this matter.
- 4. What system does [the Sponsor] [redacted] have in place to verify the electronic signatures of the applicants and the agents?

5. [...]

- 7. Keely Janzen:
 - a. Please provide a list of all business submitted by Keely Janzen between October 5, 2022 to present day.
 - b. Please provide a list of commissions earned, any chargebacks, any payments by Keely for any debt, and current balance owing if any.
 - 8. [...]

[...]

On February 5, 2024, the AIC investigator received the following information from the Sponsor:

[...]

RE: AIC Case#[redacted], 73272 and [redacted] - Request for Information

[...]

Outlined below are the responses to the questions listed in your December 14, 2023 email as well as a list of Alberta insurance sales made for each agent for the specified time period and all commission totals tied to them.

1. What is your standard process for the submission of applications? (please be specific)

[Sponsor] [redacted] agents use the company provided software to complete applications and obtain customers [sic] signature. Once an agent and the customer complete an application, the agent uses the same software installed on his or her computer to send the application to the company. When the company receives the application, the review and underwriting process begins.

- 2. How does [the Sponsor] [redacted] identify which agent submits the application? If it uses Identifying codes for the agents, how and when are those assigned?
 - a) How does [the Sponsor] [redacted] identify which agent submits the application?

Each agent uses his or her unique username and password to log into the software.

[The Sponsor] [redacted] identifies which agent submitted the application based on their agent number and signature.

b) If it uses Identifying codes for the agents, how and when are those assigned?

Each agent is assigned a unique code number by the Company when authorized to represent the company in the province in which agent [sic] is licensed.

- 3. [...]
- 4. What system does [the Sponsor] [redacted] have in place to verify the electronic signatures of the applicants and the agents?

[The Sponsor's] [redacted] electronic application software has an integrated third-party signature platform to ensure the proper collection of signatures. At the application process, the agent requests an email address from the customer, to which the electronic application is emailed to the customer for review and electronic signature. A DocuSign signature certificate is also sent to the company as verification.

5. [...]

7. Keely Janzen:

[...]

Please note that Kelly [sic] Janzen is still actively contracted with the Company and we anticipate her ongoing insurance sales should pay back the balance of her prepaid commission advances.

In the same email of February 5, 2024, the Sponsor provided the investigation notes relating to the Complainants

policies, which provided in part:

[The Complainants] [redacted] -- NOTES

When we reviewed the letter from the Alberta Insurance Council dated April 3, 2023, regarding [the Complainants'] [redacted] applications, we contacted agents who submitted applications on behalf of the [the Complainant and their spouse] [redacted], this included Keeley Janzen, [P.J.] [redacted], and [C.T.] [redacted]. We also gathered details from [P.J.'s] [redacted] and [C.T.'s] [redacted] manager, [M.A.] [redacted].

Below are the details we have noted for each agent involved with [the Complainants'] [redacted] applications:

Keely Janzen:

- Application for [the Policy] [redacted], listed Keely Janzen as the submitting agent.
- This application was completed on 10/18/2022. This was the first application submitted by Keely Janzen.
- The email address r*******12@gmail.com [redacted], is [M.A.'s] [redacted] personal email address.
- When we contacted Keely, she explained that she had never met with [the Complainants] [redacted] and had not completed an application for them.
- Keely explained she was not aware that the application was submitted under her name. She became aware of this after receiving correspondence from the Alberta Insurance Council.
- Keely notified us that she has also been corresponding with the Alberta Insurance Council regarding this matter.

[...]

Discussion

Section 509(1)(c) of the Act provides that "[n]o insurer, insurance agent or adjuster may engage in any unfair, coercive or deceptive act or practice." Offences such as those considered under s. 509(1)(c) of the Act are strict liability offences. As such, the AIC only has the onus to prove that the Agent's actions regarding allowing other agents to log in to her Sponsor's application account and submit a life insurance application on her behalf with varying false information and without the knowledge or consent of the client was an unfair, coercive or deceptive act or practice. Once this occurs, the onus then shifts to the Agent to establish a defence of due diligence. To establish this, the Agent must prove that all reasonable measures were taken to avoid taking part in any unfair, coercive or deceptive acts or deceptive acts or practices.

The Report alleged that the Agent was guilty of one (1) count of engaging in any unfair, coercive or deceptive act or practice, as contemplated by s. 509(1)(c) of the Act, and subsequently violated s. 480(1)(b) of the Act, when the Agent

allowed other agents to log in to her Sponsor's application account and submit a life insurance application on her behalf with varying false information and without the knowledge or consent of the client.

The Council took note of the statement from the Complainants, in their initial email of February 17, 2023, that they had notified the Sponsor that they would not be pursuing any coverage with them:

[...]

We let [the Sponsor] [redacted] know that we would not be pursuing any coverage with them, however since then we have received numerous physical mail [sic] showing what appears to be approved insurance policies with [the Sponsor] [redacted].

The Council further noted the statement from the Complainants in their February 24, 2023, email:

[...] As I've stated earlier, we did not sign up with [the Sponsor] [redacted]. [...]

The Council also took note of the Sponsor's statement that, after review, they determined that the personal information provided by an agent working for the Sponsor for applications in the names of the Complainants was in fact inaccurate. The Sponsor further stated that the email used to sign the application via DocuSign was not valid, and that the electronic signatures were completed by an agent working for the Sponsor, and not the Complainants. These statements were in the letter dated April 20, 2023, from the Sponsor:

[...]

[The Sponsor] [redacted] received four applications for [the Complainants] [redacted] dated September 30, 2022, two applications dated October 17, 2022 and October 18, 2022. After review, we determined the personal information provided by agent [redacted] for [the Complainants'] [redacted] applications was inaccurate. All policies issued for [the Complainants] [redacted] have been null and void, and all collected premiums have been credited to the bank account listed on the applications.

[...]

There were no changes regarding the agent on record for these policies. [...]. Our records also show Keely Janzen is an agent on record for [the Policy] [redacted].

[...]

Upon further review of the applications for [the Complainants] [redacted], it appears that agent [redacted] provided inaccurate information for these applications. This included Social Insurance, driver's licenses, and phone numbers. The email address used to complete the DocuSign is also not valid. The inaccurate information provided by agent [redacted] indicates that electronic signatures were completed by agent [redacted], not by [the Complainants] [redacted].

[...]

The Council also took note of some of the information contained in the Policy, which was received by the AIC on April 25, 2023:

- Policy Number: ******24 [redacted]
- Date: October 18, 2022
- Name: [Client 1] [redacted]
- Driver's License: *****25 [redacted]

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- Email of Client 1: sk*****@gmail.com [redacted]
- DocuSign Email: ro*******12@gmail.com [redacted]

The Council took note of the Agent's statement in their April 29, 2023, email to the AIC:

[...]

There has never been any communications [sic] between myself and [the Complainants] [redacted] all I knew is I needed a coded sale to activate my contract. I was not present and unaware of the sale taking place at the time of signing.

The Council further took note of the Agent's statement, in their June 23, 2023, email to the AIC, that they had

received emails regarding the Complainant and their spouse's insurance applications:

[...]

[...] I never received any info on the submission or issuing of the policy. This was done without my knowledge. i [sic] did receive an email notification that the phone number on [the Complainants'] [redacted] application was incorrect. Since their names were not familiar and I was new with the company, I did not respond thinking that the email was sent to me in error. My understanding was that [the Complainants'] [redacted] policy was cancelled and the initial premium was refunded to the account on file.

The Council Verification Call Email to the Agent, attached to the September 19 2023 Email, regarding the Policy:

[...] Date: Mon, Oct 24, 2022 at 3:13 PM Subject: [AO] Verification Call Result: [CLIENT 1] [redacted] : [Policy] [redacted] [...]

Home Office has attempted to make a verification call for the above policy number, but the number on file is either incorrect or not in service.

Please provide an alternative number to reach the applicant

at [email] [redacted] or [email] [redacted] no later than Oct 27 2022 6:10AM or a NOPRD/NOADV will be added to the policy.

[...]

The Council noted the Agent's statements in their December 4, 2023, email to the AIC:

2. You mention not being present or knowing at the time, how did you find out that this application went in? How was it submitted on your behalf? Could you explain your systems?

a. You mention not being present or knowing at the time, how did you find out that this application went in?

 \cdot I learned that the application went in under my name when the Alberta Insurance Council contacted me.

b. How was it submitted on your behalf?

· I don't have any direct knowledge about how this application was submitted on my behalf.

c. Could you explain your systems?

· Applications are completed and signed electronically through the software provided by [the Sponsor] [redacted]. Completed and electronically signed applications are transmitted to [the Sponsor] [redacted] for processing.

The Council found the Sponsor's statements in their February 5, 2024, letter to the AIC to be persuasive:

1. What is your standard process for the submission of applications? (please be specific)

[Sponsor] [redacted] agents use the company provided software to complete applications and obtain customers [sic] signature. Once an agent and the customer complete an application, the agent uses the same software installed on his or her computer to send the application to the company. When the company receives the application, the review and underwriting process begins.

- 2. How does [the Sponsor] [redacted] identify which agent submits the application? If it uses Identifying codes for the agents, how and when are those assigned?
 - a) How does [the Sponsor] [redacted] identify which agent submits the application?

Each agent uses his or her unique username and password to log into the software. [The Sponsor] [redacted] identifies which agent submitted the application based on their agent number and signature.

b) If it uses Identifying codes for the agents, how and when are those assigned?

Each agent is assigned a unique code number by the Company when authorized to represent the company in the province in which agent is licensed.

[...]

4. What system does [the Sponsor] [redacted] have in place to verify the electronic signatures of the applicants and the agents?

[The Sponsor's] [redacted] electronic application software has an integrated third-party signature platform to ensure the proper collection of signatures. At the application process, the agent requests an email address from the customer, to which the electronic application is emailed to the customer for review and electronic signature. A DocuSign signature certificate is also sent to the company as verification. [...]

The Council further took note of the Sponsor's investigation notes which were attached to the February 5, 2024,

letter from the Sponsor:

[...]

Below are the details we have noted for each agent involved with [the Complainants'] [redacted] applications:

Keely Janzen:

- Application for [the Policy] [redacted], listed Keely Janzen as the submitting agent.
- This application was completed on 10/18/2022. This was the first application submitted by Keely Janzen.
- The email address r*******12@gmail.com [redacted], is [M.A.'s] [redacted] personal email address.
- When we contacted Keely, she explained that she had never met with [the Complainants] [redacted] and had not completed an application for them.
- Keely explained she was not aware that the application was submitted under her name. She became aware of this after receiving correspondence from the Alberta Insurance Council.
- Keely notified us that she has also been corresponding with the Alberta Insurance Council regarding this matter.

[...]

Collectively, the Council is comprised of both industry and public members who are well-equipped to assess consumer risk and industry competence. The Council weighed the effects of the alleged actions, the evidence presented, and the accounts of all parties involved when arriving at their conclusion. In light of the evidence demonstrating that an application was made for the Policy under the Client 1's name and using inaccurate information and a forged signature, through the Agent's application account with the Sponsor, the Agent's awareness that this occurred, and the Agent's lack of diligence and failure to respond appropriately upon receiving notification that the application was submitted in her name, the evidence confirms that the Agent allowed other agents to log in to her Sponsor application account and submit a life insurance application on her behalf with varying false information and without the knowledge or consent of the client. Therefore, the Council finds that the Agent engaged in an unfair, coercive or deceptive act or practice as contemplated by s. 509(1)(c) of the Act and has thus breached s. 480(1)(b) of the Act.

In terms of the available sanction, the Council may impose a civil penalty for a violation of s. 480(1)(b) of the Act not exceeding \$1,000.00 per demonstrated offence, in accordance with s. 36.1(1)(b) of the *Insurance Agents and Adjusters Regulation*, AR 122/2001. Given the evidence that the Agent allowed other agents to log in to her Sponsor application account and submit a life insurance application on her behalf with varying false information and without the knowledge or consent of the client, the Council orders that a civil penalty of \$1,000.00, per demonstrated offence, resulting in one (1) offence, equaling a total civil penalty of \$1,000.00 be levied against the Agent.

The civil penalty must be paid within thirty (30) days of the date the decision is mailed. In the event that the civil penalty is not paid within thirty (30) days, interest will begin to accrue. Pursuant to s. 482 of the Act (copy enclosed), the Agent has thirty (30) days in which to appeal this decision by filing a Notice of Appeal with the Office of the Superintendent of Insurance.

This Decision was made by way of a motion made and carried at a properly conducted meeting of the Life Insurance Council. The motion was duly recorded in the minutes of that meeting.

Date: February 27, 2025

[Original Signed By]

Usman Mahmood, Vice-Chair Life Insurance Council

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Extract from the Insurance Act, Chapter I-3

<u>Appeal</u>

482 A decision of the Minister under this Part to refuse to issue, renew or reinstate a certificate of authority, to impose terms and conditions on a certificate of authority, to revoke or suspend a certificate of authority or to impose a penalty on the holder or former holder of a certificate of authority may be appealed in accordance with the regulations.

Extract from the Insurance Councils Regulation, Alberta Regulation 126/2001

Notice of appeal

16(1) A person who is adversely affected by a decision of a council may appeal the decision by submitting a notice of appeal to the Superintendent within 30 days after the council has mailed the written notice of the decision to the person.

(2) The notice of appeal must contain the following:

- a) a copy of the written notice of the decision being appealed;
- b) a description of the relief requested by the appellant;
- c) the signature of the appellant or the appellant's lawyer;
- d) an address for service in Alberta for the appellant;
- e) an appeal fee of \$200 payable to the Provincial Treasurer.

(3) The Superintendent must notify the Minister and provide a copy of the notice of appeal to the council whose decision is being appealed when a notice of appeal has been submitted.

(4) If the appeal involves a suspension or revocation of a certificate of authority or a levy of a penalty, the council's decision is suspended until after the disposition of the appeal by a panel of the Appeal Board.

Contact Information and Useful Links for Appeal:

Email: <u>tbf.insurance@gov.ab.ca</u> Phone: 780-643-2237 Fax: 780-420-0752 Toll-free in Alberta: Dial 310-0000, then the number Mailing Address: 402 Terrace Building, 9515 – 107 Street Edmonton, AB T5K 2C3 Link: <u>Bulletins, notices, enforcement activities | Alberta.ca</u> – *Interpretation Bulletin 02-2021 – Submitting Notices of Appeal of Insurance Council Decisions*