

BC FINANCIAL SERVICES AUTHORITY
IN THE MATTER OF THE *REAL ESTATE SERVICES ACT*
SBC 2004, c 42 as amended

AND

IN THE MATTER OF

XIN BO (ANGELA) GUO

AND

ANGELA GUO PERSONAL REAL ESTATE CORPORATION
(167457)

REASONS FOR DECISION REGARDING
ADMINISTRATIVE PENALTY RECONSIDERATION REQUEST

[This Decision have been redacted before publication.]

DATE AND PLACE OF HEARING: Via Written Submissions

HEARING OFFICER: Gareth Reeves

Introduction

1. On July 8, 2024, the BC Financial Services Authority ("**BCFSA**") issued a Notice of Administrative Penalty (the "**NOAP**") in the amount of \$4,000 to Angela Guo pursuant to section 57(1) and 57(3) of the *Real Estate Services Act*, RSBC 2004, c 42 ("**RESA**").
2. In the NOAP, BCFSA determined that Angela Guo had contravened sections 40(3)(b) and 41 of the *Real Estate Services Rules*, BC Reg 209/2021 (the "**Rules**") by failing to identify her registered name "Angela Guo Personal Real Estate Corporation" on her Instagram and X accounts and failing to "qualify the particulars of being" a "Top 1% President Club Member" on her Instagram and "2017 President's Club" on her Facebook account.
3. Angela Guo applied for a reconsideration of the NOAP under section 57(4) of RESA. The application proceeded by written submissions.

Issues

4. The issue is whether the July 8, 2024 NOAP should be cancelled or confirmed.

Jurisdiction and Standard of Proof

5. This application for reconsideration is brought pursuant to section 57(4) of RESA, which requires the Superintendent of Real Estate (the “**superintendent**”) to provide a person who receives an administrative penalty with an opportunity to be heard upon request.
6. Section 57(4) of RESA permits the superintendent to cancel the administrative penalty, confirm the administrative penalty, or, if the superintendent is satisfied that a discipline hearing under section 40 of RESA would be more appropriate, cancel the administrative penalty and issue a notice of discipline hearing.
7. The superintendent has delegated the statutory powers and duties set out in section 57 to Hearing Officers.
8. The standard of proof is the balance of probabilities.

Background

9. The evidence and information before me consists of an investigation report completed by BCFSA, the tabs to that report, and the information provided by Ms. Guo in the application for reconsideration. The following is intended to provide some background to the circumstances and to provide context for my reasons. It is not intended to be a recitation of all of the information before me.

General Background

10. Ms. Guo was first licensed on November 22, 2013 as a representative in the trading services category. Ms. Guo’s personal real estate corporation became licensed on October 30, 2014. During the relevant period, Ms. Guo was licensed as follows:
 - a. From January 17, 2018 to November 2, 2018 with Nu Stream Realty Inc;
 - b. From November 3, 2018 to November 19, 2018 she was unlicensed;
 - c. From November 20, 2018 to August 31, 2022 with RA Realty Alliance Inc; and
 - d. From September 1, 2022 to present with Metro Edge Holdings Ltd dba “Metro Edge Realty”.
11. On January 3, 2024, while conducting a separate investigation, BCFSA Investigations noted that Ms. Guo’s Instagram account indicated she was a “Top 1% President Club Member” and included the name “Angela Guo PREC*”. They also noted that her X account used the name “Angela Guo Realtor”. Neither account used her personal real estate corporation’s licensee name “Angela Guo Personal Real Estate Corporation” in the bio portion. Ms. Guo’s Instagram page did not indicate the basis, source, date, or qualifying information for her receipt of the Top 1% President Club Membership award.
12. The screenshot of Ms. Guo’s X account taken by BCFSA Investigations indicates that she joined X in October 2018. The most recent post was made on April 21, 2019. The profile picture includes the name “RA Realty Alliance Inc”, the brokerage Ms. Guo was licensed with after Nu Stream Realty Inc.
13. The screenshot for her Instagram page shows five posts, 79 followers, and one account being followed. The most recent post on that page references “Nu Stream” but that post’s date is not apparent from the screenshot.

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14. On April 12, 2024, BCFSa Investigations wrote to Ms. Guo to advise that her Instagram and X pages failed to show her personal real estate corporation's registered licensee name and her Instagram account failed to explain the qualifications for her being a "Top 1% President Club Member". The letter requested screenshots of the corrected social media pages by April 26, 2024.
 15. On April 12, 2024, Ms. Guo responded that she had corrected the issue. This email appends two screenshots. The first is an Accounts page showing a linked Facebook account under the name "Angela Guo". The second is an Instagram account with the name "Angela Guo / Vancouver Realtor". This account uses a different account name and profile photo from that shown in the screenshots taken by BCFSa Investigations on January 3, 2024. The account Ms. Guo sent pictures of has five posts and 129 followers and follows 142 accounts. These are clearly different Instagram accounts.
 16. On April 15, 2024, BCFSa Investigations replied to Ms. Guo to advise that her Facebook account was also non-compliant. The reply also directed Ms. Guo to BCFSa's Knowledge Base regarding advertising and to her managing broker. The reply confirmed the April 26, 2024 deadline for Ms. Guo to provide proof of the required changes.
 17. I pause to note that the allegation in the April 15, 2024 reply that Ms. Guo's Facebook account was non-compliant appears to be based on a misapprehension that both the screenshots appended to her April 12, 2024 email were of her Facebook account when the second was of her Instagram account. In any event, the screenshot she sent did not properly display her personal real estate corporation's licensee name.
 18. Ms. Guo replied on that same date expressing her confusion regarding what the issue was. Then, on April 19, 2024, she emailed her managing broker and BCFSa Investigations to advise that she could not change her Facebook account again in the next 60 days and to express confusion about what she should do.
 19. Ms. Guo did not submit proof of the requested changes to her social media on April 26, 2024.
 20. A review by BCFSa Investigations on April 29, 2024 confirmed that the Instagram and X accounts BCFSa had reviewed on January 3, 2024 remained as described above.
 21. BCFSa Investigations conducted a similar review of a Facebook account under with the name "Angela Guo PREC Real Estate" on May 14, 2024. On that page, the banner includes the following text "2017 President's Club (Individual)" and "Angela Guo Personal Real Estate Corporation". The profile picture includes the name RA Realty Alliance Inc, Ms. Guo's brokerage after her time at Nu Stream Realty Inc. The most recent post shown on that page was dated January 22, 2019.
 22. I note that the banner picture for that Facebook account captured on May 14, 2024 is the same as the profile picture for the January 3, 2024 captured Instagram account. Notably, the profile picture and account names on the Facebook profile Ms. Guo sent to BCFSa on April 12, 2024 are different from those on the one BCFSa Investigations took screen shots of on May 14, 2024.
 23. On May 15, 2024, BCFSa sent Ms. Guo a Non-Compliance Warning Letter regarding five alleged contraventions. Four of those align with the contraventions listed in the NOAP. The fifth alleged that she failed to state her full personal real estate corporation name on her Facebook page and used "PREC" instead. The letter noted "This is not a Notice of Administrative Penalty" [emphasis original] and set out the base amount and daily amount for the noted contraventions. It set a deadline for Ms. Guo to bring herself into compliance by May 22, 2024 and defined the "Compliance Warning Period" as the period between the date of the letter and May 22, 2024. The letter also stated:

"If you cease the Contravention and comply with the Rules within the Compliance Warning Period, BCFSa may impose an administrative penalty for the base amount associated with the Contravention." [emphasis original]

24. On that same day, it appears that Ms. Guo sent text messages to a contact named “Sandy”. The messages are in Simplified Chinese. I assume these are messages with the individual who created the offending social media pages asking for assistance to remove them.
25. On May 19 and 20, 2024, Ms. Guo exchanged a series of text messages with an individual named [Individual 1] who it appears was helping her take down her X account.
26. On May 21, 2024, Ms. Guo provided BCFSa Investigations with proof that the X account had been deleted and forwarded a May 20, 2024 email from Facebook support regarding removal of an account purporting to be Ms. Guo.
27. On that same date she also emailed BCFSa Investigations, her current managing broker, and her former managing broker in 2018, to state that there were Facebook, Instagram, and X accounts under her name that she had not created, but which were set up in 2018 by her former brokerage’s marketing team. She asks for the account login credentials or deletion of the accounts. This email attaches screenshots and photographs of Instagram, Facebook, and X accounts which match the ones shown in BCFSa’s January 3, April 29, and May 14, 2024 screenshots; text messages with her former managing broker in Simplified Chinese; and phone calls to her former managing broker; and an X account named Angela Guo created May 2024.
28. On May 22, 2024, BCFSa Investigations confirmed that Ms. Guo’s Instagram and X accounts were no longer visible online. Although this is not exactly clear from the materials, I assume this is in reference to the accounts shown in the January 3 and April 29, 2024 screenshots taken by BCFSa Investigations.

Submissions

29. On August 7, 2024, Ms. Guo provided submissions dated July 20, 2024. She submits that she is sorry for what occurred and advises that she is “not particularly proficient in computer marketing.” She states that the accounts were created by a secretary at her former brokerage, Nu Stream Realty Inc, who was not familiar with the real estate industry, resulting in errors in advertisements. This secretary was responsible for all accounts and passwords.
30. Ms. Guo says she was unaware of the accounts. When she received BCFSa’s Non-Compliance Warning Letter she hired a specialist to help her and eventually had to shut down all the accounts.
31. Ms. Guo states that she feels the process was unfair because the first letter from BCFSa said it was not a Notice of Administrative Penalty, but an administrative penalty was issued despite that.
32. Ms. Guo also states that high interest rates have meant there were fewer transactions. In addition, there has been a significant illness in her family that required her to travel to China. She provides what appear to be Chinese medical documents to support this. She notes these facts have caused her some financial problems, but does not provide details.

Reasons and Findings

Applicable Legislation

33. Section 56 of RESA provides that BCFSa may designate specific provisions of RESA, the *Real Estate Regulation*, BC Reg 506, 2004 (the “**Regulations**”), or the Rules as being subject to administrative penalties, and may establish the amounts or range of amounts of administrative penalty that may be imposed in respect of each contravention of a specified provision. Pursuant to section 56(2), the maximum amount of an administrative penalty is \$100,000.

34. Section 26(1) of the Rules indicates that for the purposes of section 56(1) of RESA, contraventions of the Rules listed in section 26(2) are designated contraventions to which Division 5 (Administrative Penalties), Part 4 of RESA, applies.
35. From February 1, 2021 to June 30, 2024, section 26(2) of the Rules identified four categories, Category A, B, C, and D, for designated contraventions for the purpose of determining the amount of an administrative penalty. Sections 40 and 41 of the Rules were placed in Category D. Section 27(4) of the Rules provided that Category D contraventions would attract a \$1,000 base penalty for a first contravention plus an additional \$250 per day, or part of a day, that the contravention continues.¹
36. Section 57(1) of RESA sets out that if the superintendent is satisfied that a person has contravened a provision of RESA, the Regulations, or the Rules designated under section 56(1)(a) of RESA, the superintendent may issue a notice imposing an administrative penalty on the person. Section 57(2) requires that a notice of administrative penalty indicate the rule that has been contravened, indicate the administrative penalty that is imposed, and advise the person of the person's right to be heard respecting the matter.
37. The Rules provide as follows:
- 1 In these rules:
- "publish"**, in relation to real estate advertising, includes (
- (a) causing or permitting real estate advertising to be published; and
- (b) displaying real estate advertising, or causing or permitting real estate advertising to be displayed;
- 40 (1) A licensee must not publish real estate advertising unless the advertising complies with this section.
- ...
- (3) Real estate advertising that identifies a managing broker, associate broker or representative must do so,
- ...
- (b) if that person is a personal real estate corporation or a controlling individual of a personal real estate corporation, by using the licensee name of the personal real estate corporation only.
- 41 A licensee must not publish real estate advertising that the licensee knows, or reasonably ought to know, contains a false or misleading statement or misrepresentation concerning real estate, a trade in real estate or the provision of real estate services.
38. I note that between June 15, 2018 and January 30, 2021, the Rules designated the predecessor to section 40 of the Rules, then section 4-6, as being eligible for an administrative penalty. The Rules at that time did not designate the predecessor of section 41 of the Rules, then section 4-7, as eligible for an administrative penalty. During this period, the amount of an administrative penalty was \$625 for a first contravention.

¹ I have included in the noted time range the period during which the predecessor sections in the former *Real Estate Services Rules*, M417,2004, had effectively the same designations.

Analysis

39. The imposition of an administrative penalty under section 57 of RESA is a discretionary decision. A request to reconsider the imposition of an administrative penalty requires a Hearing Officer to consider not only whether a contravention of RESA, the Regulations, or the Rules has occurred, but also whether a licensee exercised due diligence, that is: took reasonable steps or precautions, to prevent the contravention of the designated sections identified in the notice of administrative penalty. A Hearing Officer may also consider information on any extenuating circumstances that prevented compliance, or any other information the licensee believes a Hearing Officer should consider.
40. In order to establish that a licensee contravened section 41 of the Rules, the following must be shown:
 - a. The licensee published the material by causing or permitting it to be published, displaying it, or causing or permitting it to be displayed;
 - b. The material was real estate advertising;
 - c. The content made a false or misleading statement or misrepresentation concerning real estate, a trade in real estate, or the provision of real estate services; and
 - d. The licensee knew or ought to have known the material contained the above noted false or misleading statement(s) or misrepresentation(s).
41. The question of due diligence arises in two contexts within that analysis. First, it arises in the knowledge section in regard to the licensee exercising due care regarding the content published. Once it is proven that the material contained false or misleading statements or misrepresentations, the question is whether the licensee exercised due diligence with regard to those statements or representations. Second, it arises in the publication analysis when addressing whether the licensee exercised due care when causing or permitting publication. Here, the question is whether the licensee exercised due care when causing, permitting, or continuing publication.
42. In many cases, the content question is of primary concern because the licensee is actively involved in the production and dissemination of the material and the question of care in publishing does not arise; however, in some cases the question of care in publication arises as well because the licensee shares, disseminates, or otherwise becomes connected to the publication after it is published. In this case, the latter question arises.

Contraventions

43. I have no trouble in concluding that the Facebook, Instagram, and X pages at issue were real estate advertising. This is obvious on their face.
44. I have little trouble concluding that the Instagram and X pages at issue failed to properly identify Ms. Guo's personal real estate corporation's name as required by section 40(3)(b) of the Rules. The pages did not use that name and instead used the name short form "PREC". On May 4, 2021, BCFSa (or its predecessor the Real Estate Council of British Columbia), published the Personal Real Estate Corporation Guidelines, which include guidance regarding licensees using personal real estate corporations ("PRECs"). That states, in part:

When licensing a personal real estate corporation, make sure that the legal name of the personal real estate corporation is the name in which you wish to advertise.

Using the term PREC is not permitted. You must use the entire “personal real estate corporation” term.

45. That guidance goes on to state a limited exception with regard to MLS® material, but provides for specific guidance on how the name should be shown in that context. Importantly, there is no exception for social media.
46. I also have little trouble concluding that the publication on Instagram that Ms. Guo was a “Top 1% President Club Member” and on X that she was in the “2017 President’s Club” were misleading. These representations included no qualifying information that would specify on what basis these awards were granted. Without that qualifying information the public could easily have concluded that these awards concerned times, volumes of transactions, or other qualifying criteria that they did not.
47. I note that BCFSAs Advertising Guidelines published May 4, 2021 noted the need for these kinds of awards or honours to indicate the basis for them including the source, date, and any qualifying information. In my view, this is necessary to ensure the nature of those awards is clearly communicated and the public is not misled into believing the awards indicate more than they actually do.
48. Turning to the question of publication, this case is somewhat peculiar. It involves three social media pages published regarding a real estate licensee that were active for a relatively short period many years ago and which were published, not by the licensee, but by staff of the licensee’s brokerage. At the time when the publication began, one of the contraventions was not eligible for an administrative penalty and for the other the maximum administrative penalty was \$625 for a first contravention. The administrative penalty regime then changed in February 2021, while the publication was ongoing. The publication then continued until May 2024.
49. I note, in regard to the Facebook and X accounts, that Ms. Guo’s explanation that she did not have control of the pages because they were set up by a secretary at Nu Stream Realty Inc. who was responsible for the accounts and passwords does not align with the facts. In particular, those pages were updated to include profile pictures naming Ms. Guo’s new brokerage, which must have occurred after Ms. Guo left Nu Stream Realty Inc. I therefore find that Ms. Guo must have had some ability to control or direct the publication of and content of those sites. It may be the case that a secretary at Nu Stream Realty Inc. set up these pages, but the change to RA Realty Alliance Inc. would not have happened without Ms. Guo’s input.
50. I also conclude from this, that Ms. Guo was aware of the pages around the time they were created, contrary to her submission that she was unaware of them. I do, however, find that Ms. Guo effectively forgot the pages existed over the intervening years.
51. I therefore conclude that she permitted the publication of these webpages in the period from October 2018 to April 2019. It is not clear if she caused the publication by consenting to them in advance or directing that they be created, but she had at least sufficient control and direction over them to have corrected their contents or to have ended their publication during that period.
52. There is no evidence that Ms. Guo exercised any degree of diligence with regard to the publication or the content of the social media pages at that time. I find that she did not take the necessary and reasonable steps to ensure the material was compliant with the Rules at the time.
53. However, the administrative penalty was not issued for that period. Given the amount issued and the inclusion of section 41 of the Rules, it must have related to the period after February 1, 2021, when the base amounts increased and the predecessor of section 41 became a designated contravention.

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54. During this period, the social media pages remained up and available to the public. Ms. Guo took no steps to remove them. She likely gave no real thought to them. In fact, she maintained separate Instagram and Facebook accounts. There is no evidence that Ms. Guo thought about the subject social media pages during this time. Her confusion when contacted by BCFSA in April 2024 shown by her responses and the screenshots included in her responses, indicates she had forgotten that these pages existed. BCFSA's response to her on April 15, 2024 did not relieve this confusion, because it did not clarify that the accounts Ms. Guo provided were not the ones initially at issue.
55. It appears that Ms. Guo's confusion was resolved on May 15, 2024 at the latest when she reached out to the secretary who had created the pages. This was the same day she received the Non-Compliance Warning Letter. After this date, Ms. Guo acted promptly and had the pages blocked or removed by the required deadline. I conclude that once she was consciously aware of the pages at issue, she dealt with the problem reasonably quickly.
56. The question I must decide therefore, is whether Ms. Guo exercised due diligence to address the outstanding social media pages before the regulator brought them to her attention.
57. In answering this question, three points are important.
58. First, the definition of "publish" includes both "causing" and "permitting".
59. In my view, the word "permitting" includes a meaning that encompasses both directly consenting to something and to allowing something to happen with knowledge, actual or implied, that it will occur or is occurring. The phrasing of the definition in the Rules, in particular the use of both "causing" and "permitting" together, suggests that the drafter intended that definition to apply beyond cases where the licensee consented in advance or actively pursued the publication. The wording indicates that the licensee alleged to have permitted the publication had a degree of knowledge of the post. In my view, that degree of knowledge includes actual knowledge and implied knowledge, that which the licensee reasonably ought to have known: see *R v Sault Ste Marie (City)*, [1978] 2 SCR 1299 at pp 1326-1329.
60. In addition, the word "permitting" also suggests an ongoing obligation. This is supported by the fact that the advertising sections of the Rules are designated as Category D contraventions that permit a daily penalty amount. It is also supported by common sense. Publication, particularly in the social media context, does not occur on a single day. It persists as long as the material remains in circulation.
61. Second, licensees are primarily responsible for regulatory compliance. The superintendent, and by extension BCFSA, have both a supervisory and enforcement obligation, but that does not mean that individual licensees need not exercise due care to ensure they remain in compliance with the legislation absent reminder from the regulator. In the context of real estate advertising, this means that real estate licensees must take steps to ensure they are not permitting ongoing contraventions.
62. Third, the question of what a licensee ought to have done is a contextual question that considers the facts of the case as a whole. This includes, at least the following factors:
- a. The nature and extent of the licensee's involvement in and knowledge of the creation of the material;
 - b. The nature and extent of the licensee's involvement in and knowledge of the initial publication of the material;
 - c. The nature and extent of the licensee's involvement in and knowledge of the ongoing publication of the material;
 - d. The nature and extent of the licensee's knowledge of and ability to control the publication both in an ongoing way; and

- e. The degree and nature of the connection between the licensee and the publication.
63. In this case, the social media pages were made by a secretary at Ms. Guo's former brokerage. As indicated above, Ms. Guo was able to arrange a change of the pages when she moved to another brokerage soon after the pages were created. Therefore, Ms. Guo was involved in the initial publication and had some control over it moving forward. In addition, she knew that they were being published. This is evident from the fact that she knew to reach out to her old brokerage to attempt to have the pages taken down. In addition, the successful steps she took to have the pages taken down indicate that she had a degree of ongoing control, even if she did not have the passwords necessary to access the pages directly. She might not have been directly involved in the creation, but she had control over the publication both initially and on an ongoing basis.
64. The social media pages were also directly connected to her and she was the only individual licensee featured in them.
65. The remaining factor is Ms. Guo's knowledge and control on an ongoing basis. As noted above, Ms. Guo had ongoing control, this is demonstrated by the speed with which she was able to have the pages taken down. The issue here is that Ms. Guo had no ongoing knowledge of the pages, she had, in essence, forgotten about them.
66. In my view, that is not enough to establish due diligence. Ms. Guo knew about the pages initially and failed to exercise due care in their initial publication, she cannot now claim that she should be absolved of ongoing responsibility because she failed to act for long enough that the issue left her mind.
67. I recognize that from time-to-time licensees will have their information posted online on information aggregating services or by individuals attempting to impersonate them. In those cases, the licensee will not have been involved in, or had control over, the publication of that material. This case does not address what obligations a licensee might have to find and address that kind of material. This case addresses a circumstance in which the licensee was involved in and permitted the initial publication. In those circumstances, forgetting about the publication is not exercising due diligence.
68. I therefore find that Ms. Guo committed the following contraventions:
- a. She contravened section 41 of the Rules by permitting publication of an Instagram page which failed to include qualifying information of her being a "Top 1% President Club Member";
 - b. She contravened section 40(3)(b) of the Rules by permitting publication of an Instagram page that failed to identify the licensee name of her personal real estate corporation "Angela Guo Personal Real Estate Corporation";
 - c. She contravened section 40(3)(b) of the Rules by permitting publication of an X page that failed to identify the licensee name of her personal real estate corporation "Angela Guo Personal Real Estate Corporation"; and
 - d. She contravened section 41 of the Rules by permitting publication of a Facebook page which failed to include qualifying information of her being in the "2017 President's Club".

Penalty Amount

69. I have concluded that Ms. Guo contravened the Rules as set out above. Those are four separate contraventions, and each attracts a base penalty amount of \$1,000. They could also attract a daily penalty amount of \$250 for each day, or partial day, that the social media pages remained published. The contraventions were ongoing for a matter of years and could have attracted a larger sanction. In my view, the \$1,000 base penalty for each contravention was appropriate.

70. I note in this regard that Ms. Guo submits that other realtors are also in contravention of the advertising Rules and suggests further education for licensees on this point. I note that section 57(1)(b) of RESA permits the superintendent to order a licensee to undertake “a specified course of studies or training”. That may have been an appropriate element of an order, but was not necessary. I also note that BCFSA’s Knowledge Base provides guidance to licensees regarding advertising, as indicated above. That said, it may be salutary to have additional education on advertising issues for licensees as Ms. Guo suggests. Acknowledging all of that, none of these points render the monetary penalty inappropriate in this case.
71. In any event, I do not have the authority to vary the administrative penalty, I can only confirm or cancel it. Although a requirement to complete remedial education was within the range of appropriate actions here, so was issuing a monetary penalty.
72. Regarding Ms. Guo’s financial and personal circumstances. I do not find that they render a monetary penalty inappropriate in this case. The contraventions persisted for a significant period. Relative to that period, the issued administrative penalties are appropriate.
73. I therefore find that the \$4,000 penalty was appropriate.

Fairness

74. Ms. Guo argues that the Non-Compliance Warning Letter BCFSA issued stated it was not an administrative penalty and that to issue an administrative penalty after that was unfair. I disagree.
75. The Non-Compliance Warning Letter, does state it is not an administrative penalty but, as noted above, explicitly states that an administrative penalty may be issued for the base amount if the licensee complies within the Compliance Warning Period. This comports with BCFSA’s published administrative process titled Administrative Penalties Under the Real Estate Services Act, which is available online and was linked in the Non-Compliance Warning Letter. In my view, there is no unfairness in levying an administrative penalty where the contravention is established and the licensee comes into compliance only after a Non-Compliance Warning Letter is sent.

Conclusion

76. I find that Ms. Guo committed the following contraventions:
- a. She contravened section 41 of the Rules by permitting publication of an Instagram page which failed to include qualifying information of her being a “Top 1% President Club Member”;
 - b. She contravened section 40(3)(b) of the Rules by permitting publication of an Instagram page that failed to identify the licensee name of her personal real estate corporation “Angela Guo Personal Real Estate Corporation”;
 - c. She contravened section 40(3)(b) of the Rules by permitting publication of an X page that failed to identify the licensee name of her personal real estate corporation “Angela Guo Personal Real Estate Corporation”; and
 - d. She contravened section 41 of the Rules by permitting publication of a Facebook page which failed to include qualifying information of her being in the “2017 President’s Club”.
77. I find the administrative penalties issued in this case were appropriate.
78. I confirm the \$4,000 administrative penalty issued on July 8, 2024.

79. The administrative penalty is now due and payable to BCFSA.

DATED at North Vancouver, BRITISH COLUMBIA, this 22nd day of November, 2024.

“Original signed by Gareth Reeves”

Gareth Reeves
Hearing Officer