



**Citation: Ji v. Economical Insurance Company, 2023 ONLAT 21-014897/AABS**

**Licence Appeal Tribunal File Number: 21-014897/AABS**

In the matter of an application pursuant to subsection 280(2) of the *Insurance Act*, RSO 1990, c I.8, in relation to statutory accident benefits.

Between:

**Youying Ji**

**Applicant**

and

**Economical Insurance Company**

**Respondent**

**DECISION**

**ADJUDICATOR: Janet Rowsell**

**APPEARANCES:**

For the Applicant: Jeremy Liu, Paralegal

For the Respondent: Pamela Vlasic, Counsel

**HEARD: By way of written submissions**

## OVERVIEW

[1] Youying Ji, the applicant, was involved in an automobile accident on November 1, 2020, and sought benefits pursuant to the *Statutory Accident Benefits Schedule - Effective September 1, 2010 (including amendments effective June 1, 2016)* (the “*Schedule*”). The applicant was denied benefits by the respondent, the Economical Insurance Company, and applied to the Licence Appeal Tribunal - Automobile Accident Benefits Service (the “*Tribunal*”) for resolution of the dispute.

## ISSUES IN DISPUTE

- [2] The issues to be decided in the hearing are:
- i. Are the applicant’s injuries predominantly minor as defined in s. 3 of the *Schedule* and therefore subject to treatment within the \$3,500.00 Minor Injury Guideline limit?
  - ii. Is the applicant entitled to \$160.00 for an OCF-6 for visiting his family doctor, proposed by Dr. Patrick Chiu and submitted on April 9, 2021, and denied May 5, 2021?
  - iii. Is the applicant entitled to \$17.83 for an OCF-6 for medicine from Pacific Medical Pharmacy submitted on June 11, 2021, and denied July 9, 2021?
  - iv. Is the applicant entitled to \$2,990.39 for chiropractic services proposed by Prime+ Care Health Center in a treatment plan/OCF-18 (“*plan*”) submitted on April 22, 2021, and denied on April 29, 2021?
  - v. Is the applicant entitled to \$2,200.00 for Psychological Services proposed by Perfect Choice Psychological Services in a treatment plan submitted May 6, 2021, and denied May 12, 2021?
  - vi. Is the applicant entitled to interest on any overdue payment of benefits?

## RESULT

[3] I find that the applicant sustained minor injuries as a result of the accident that are treatable within the MIG. The funding limit for the MIG has been exhausted. Accordingly, an analysis of whether the treatment and assessment plans in dispute are reasonable and necessary is not required and the applicant is not entitled to any treatment plans in dispute.

- [4] The applicant is not entitled to the amount of \$160.00 for visiting his family doctor as a reasonable and necessary expense as detailed in an OCF-6, submitted on April 9, 2021.
- [5] The applicant is not entitled to the amount of \$17.83 for medicine from Pacific Medical Pharmacy, as a reasonable and necessary expense as detailed in an OCF-6, submitted on June 11, 2021.
- [6] Given that there are no benefits owed, the applicant is not entitled to interest pursuant to s. 51 of the Schedule.

## **PROCEDURAL ISSUES**

- [7] The respondent raised procedural issues in submissions, describing that the applicant's submissions included three treatment plans which were not added as issues in dispute included in the case conference report and order. In addition, the applicant did not bring a motion pursuant to Rule 15 of the Common Rules of Practice and Procedure, seeking to add the issues in dispute. I have no authority to decide, nor will I address the three treatment plans (listed in the applicant's submissions at paragraphs 6, 7, and 8), which were not properly added as issues in this appeal.
- [8] At the motion hearing before the Tribunal on March 12, 2023, the applicant withdrew the issue of an income replacement benefit (IRB). The respondent brought a motion for the production of the applicant's employment files based on their relevance to the applicant's functionality. The basis for the motion involved a consideration of the applicant's activities of daily living by drawing a comparison between the applicant's pre-accident and post-accident employment. The applicant was ordered by the Tribunal to provide complete employment files from his employers Uber and Green City by March 27, 2023.
- [9] The respondent submits that the applicant is non-compliant with the case conference report and order. To date the applicant has failed to provide two employment files as ordered by the Tribunal to be exchanged by March 27, 2023. The applicant has also failed to reply to the respondent's submission providing an explanation for his failure to satisfy the Tribunal's order for the production of the employment files. The respondent asks the Tribunal to draw an adverse inference for the purpose of assessing the applicant's functionality pre-accident and post-accident.
- [10] I agree with the respondent and I find that the applicant has failed to produce the employment files contrary to the order of the Tribunal. I find that the employment

files are likely to be relevant to the issue of the effect of the accident on the applicant's functionality, which is a factor in determining whether the applicant is subject to the MIG limits. I draw an adverse inference from the fact that the documents were not produced by the applicant. Specifically, I infer that the documents which were not produced, would have contained information unsupportive of the applicant's allegation that his functionality has been impacted by the accident-related injuries.

**Minor Injury Guideline: Pre-existing Injuries, Evidence of Physical Injuries**

- [11] I find that the applicant did not meet his burden to show that he has any pre-existing conditions that would prevent him from reaching maximal recovery if he is kept within the funding limits of the MIG. The CNR's of family physician Dr. Patrick Chiu fail to satisfy me that the applicant's accident-related injuries are not minor sequelae treatable within the limits of the MIG. There is no diagnosis offered by Dr. Chiu removing the applicant from the funding limit of the MIG. I find the Insurance Examination assessment by Dr. H. Platnick, to be persuasive in the opinion advanced based on a review of medical evidence, including the CNR's of Dr. Chiu, diagnostic tests, and following a physical examination, demonstrating that the applicant's accident-related physical injuries had resolved.
- [12] Section 18(1) of the *Schedule* provides that medical and rehabilitation benefits are limited to \$3,500.00 if the insured person sustains impairments that are predominantly a minor injury. In accordance with section 3 of the *Schedule*, "minor injury" is defined as one or more of a sprain, strain, whiplash associated disorder, contusion, abrasion, laceration, or subluxation and includes any clinically associated sequelae.
- [13] Section 18(2) states that the \$3,500 limit does not apply if the insured person "provides compelling evidence, the insured person has a pre-existing medical condition that will prevent the insured person from achieving maximum medical recovery from the minor injury if he is subject to the \$3,500 limit." The Tribunal has also determined that chronic pain with functional limitations or a psychological condition may warrant removal from the MIG. In all cases, the burden of proof lies with the applicant to demonstrate on a balance of probabilities that his injuries are not minor, or the applicant has a pre-existing condition that would prevent maximal recovery within the MIG. In all cases, the burden of proof lies with the applicant.
- [14] The respondent submits that the applicant has not provided any clinical notes and records, or other documents to confirm pre-accident medical conditions. The applicant did not provide submissions regarding the existence of any pre-existing

conditions that would remove him from the MIG. The applicant did not report or identify to Dr. Platnick, for the purpose of his Insurance Examination, any pre-accident medical condition preventing the applicant from maximal recovery within the MIG.

- [15] The applicant relies on the clinical notes and records (CNRs) of his family physician Dr. Patrick Chiu to demonstrate that his physical injuries require funding beyond the limits of the MIG to reach maximal medical recovery. The medical evidence in Dr. Patrick Chiu's CNRs show the applicant attending on three occasions, describing physical injuries caused by the accident on: November 8, 2020, June 10, 2021, and on September 4, 2021. Diagnostic tests were performed to determine the extent of the injuries complained of by the applicant, which returned unremarkable and normal results with no indication of injuries.
- [16] The applicant is an international student, who submits that he did not have OHIP coverage at the time of the accident, until May 2021. He stated that he purchased private insurance provided by Tugo Travel Insurance. However, the applicant reported to Dr. Vincent Kwong, on November 8, 2020, that his head and chest were struck at the time of the accident, resulting in a head injury. The applicant did not return to the family doctor's clinic until seven months later, on June 10, 2021, reporting low back pain. The applicant was not prescribed pain medication on the basis of his complaints, but rather anti-inflammatory meloxicam; he was also advised to continue with physiotherapy. The applicant returned on September 4, 2021, when he was advised by Dr Patrick Chiu that an x-ray of his chest, ribs and sternum was normal, in addition a further x-ray of the applicant's TM joint was unremarkable and showed no fracture.
- [17] Concussions and post-concussive syndrome, if established, fall outside the MIG because the MIG relates to "minor injuries", as defined in section 3(1) of the Schedule. However, in order to be removed from the MIG, the applicant must present evidence that demonstrates that as a result of the accident, he suffered a concussion or post-concussive syndrome. The applicant mentioned having headaches and tinnitus on November 8, 2020, when he met with his family doctor Dr. Patrick Chiu following what he described as a head injury as a result of the accident. He did not describe or reference any symptoms of a head injury as an accident-related symptom at appointments with Dr. Chiu in April and June, 2021. Dr. Chiu did not make any referrals for diagnostic testing or medical treatment and investigation by reason of the applicant's reports of a head injury. In order to determine if the applicant's injuries fall outside the MIG, I have considered whether there is evidence that the applicant sustained a concussion

or has post-concussive syndrome as a result of the accident. I am not satisfied that the applicant did sustain a concussion as a result of the accident.

- [18] I find that the applicant has provided inconsistent evidence regarding the circumstances of the accident and the incidence of a head injury taking place. The respondent submits that the information which the applicant provided at section 44 IE assessments with Alexys Kyle Cruz, Dr. Aghamohseni, Dr. Loftalizadeh and Dr. H. Platnick, are internally inconsistent. which the respondent submits raises concerns about the reliability of the applicant's evidence. The applicant provided differing accounts of the injuries sustained as a result of the car accident. The applicant stated to Alexys Kyle Cruz that he hit his head, on the steering wheel of the car at the time of the accident, losing consciousness for two minutes. On the other hand, the applicant stated to Dr. Platnick and to Dr. Aghamohseni, that he did not lose consciousness as a result of the accident.
- [19] The respondent submits that in the section 44 IE assessment of Dr. H. Platnick, dated June 24, 2021, and Paper Review dated November 8, 2021, Dr. Platnick diagnoses the applicant with uncomplicated soft tissue injuries. In the course of the physical examination, the applicant had normal spinal contour with full cervical and lumbosacral ranges of flexion/extension, rotation and lateral flexion. Based on a review of file documentation, an interview with the applicant with interpretation, and a physical assessment by Dr. Platnick, Dr. Platnick concluded that the applicant sustained cervical myofascial strain whip lash associated disorder, lumbosacral myofascial strain, and chest strain/ contusion due to seatbelt tightening. Dr. Platnick concluded that the soft tissue injuries were as a result of the November 1, 2020, motor vehicle accident, but that the injuries had resolved by the time of the assessment and the applicant had resumed his pre-accident state by the time of the Physiatry assessment and paper review.
- [20] I find that the applicant has not satisfied his burden to prove that he has pre-existing medical conditions or physical injuries caused by the accident which would prevent his maximal recovery within the limits of the MIG. In addition, the CNR's of Dr. Patrick Chiu fail to satisfy me that the applicant's accident-related injuries are not minor sequelae treatable within the limits of the Minor Injury Guideline. There is no diagnosis offered by Dr. Chiu removing the applicant from the funding limit of the MIG. The CNR's of Dr Chiu consist, for the most part, of the applicant's described accident symptoms. I find the IE assessment by Dr. H. Platnick, to be persuasive in the opinion advanced based on a review of medical evidence, including the CNR's of Dr. Chiu, diagnostic tests, and following Dr. Platnick's physical examination, which demonstrated that the applicant's

accident-related physical injuries had resolved, in addition, the applicant no longer experienced accident-related symptoms.

### **Chronic Pain Syndrome**

- [21] I find that the applicant has failed to meet his burden of showing by means of medical evidence and his employment files that he experiences chronic pain which prevents him from maximal medical recovery from accident-related injuries and reported pain within the limits of the MIG.
- [22] The applicant submits that he experiences chronic pain syndrome in his lower back as a result of the accident. The applicant relies on the CNRs of Dr Patrick Chiu, however, the applicant does not receive a diagnosis of chronic pain syndrome in the CNR's, nor is he prescribed pain medication. The applicant reports his accident symptoms to Dr. Chiu which are listed in the CNR's, at three appointments approximately a week after the accident, seven months following, and then on September 4, 2021, when Dr Chiu advises the applicant that diagnostic x-rays show unremarkable, normal results with no indication of injuries.
- [23] As stated, the respondent submits that the section 44 IE assessment of Dr. H. Platnick, diagnoses the applicant with uncomplicated soft tissue injuries. Dr. Platnick concludes that the applicant sustained cervical myofascial strain whip lash associated disorder I, lumbosacral myofascial strain, and chest strain/ contusion due to seatbelt tightening. Dr. Platnick opines that the soft tissue injuries, as a result of the accident, have resolved by the time of his assessment and Dr. Platnick's medical paper review, as a result, the applicant had resumed his pre-accident state.
- [24] The Tribunal has determined that an applicant may escape the MIG if they experience chronic pain that causes functional impairment or if they meet three of the six criteria in the AMA Guides (Sixth Edition), however the Tribunal has not been directed to the AMA Guides by the applicant in submissions. As noted earlier, the applicant failed to provide productions ordered by the Tribunal on the respondent's motion, consisting of employment files from Uber and Green Day. The respondent asks the Tribunal to draw an adverse inference regarding the applicant's functionality pre-accident and post-accident as a result of the applicant's failure regarding productions ordered by the Tribunal and relevant to the applicant's functionality. I find that the employment files are likely to be relevant to the issue of the effect of the accident on the applicant's functionality, which is a factor in determining whether the applicant is subject to the MIG limits. I draw an adverse inference from the fact that the documents were not produced

by the applicant. Specifically, I infer that the documents which were not produced would have contained information unsupportive of the applicant's allegation that his functionality has been impacted by the accident-related injuries. The effects on the applicant's functionality, is a factor to be considered to demonstrate that the applicant requires treatment beyond the limits of the MIG, to reach maximal recovery.

[25] The applicant completed an IE Functional Abilities Evaluation with Alexys Kyle Cruz, on August 18, 2021, however it was the evaluator's opinion that from a functional perspective, the results of the evaluation did not offer a valid representation of the applicant's physical abilities, based on the applicant not demonstrating physical exertion, which Alexys Kyle Cruz found an indication of a varied effort by the applicant. Because the applicant failed to produce the employment files so ordered by the Tribunal on the respondent's motion, and the applicant did not participate in the functional abilities evaluation with a valid physical exertion, the Tribunal has not been provided with sufficient evidence to assess the applicant's functionality for the purpose of assessing whether the applicant requires treatment beyond the limits of the MIG, to reach maximal recovery.

[26] The respondent submits that the Tribunal has held that identifying chronic pain, without a diagnosis of chronic pain syndrome or an indication that chronic pain is the predominant injury, is not sufficient to take the applicant out of the MIG. An explicit diagnosis may not be necessary in the face of adequate evidence with respect to how chronic pain manifests and affects the applicant's day-to-day life. Without a formal diagnosis, this Tribunal has refused to accept that the simple fact that soft tissue injuries do not resolve in several years as sufficient to conclusively state that they were not minor in nature.

[27] I find that the applicant has failed to meet his burden of showing by means of medical evidence and his employment files that he experiences chronic pain which prevents him from maximal medical recovery from his accident-related injuries and reported pain within the limits of the MIG.

### **Psychological Injuries**

[28] I am not satisfied that the applicant has established on a balance of probabilities that he sustained psychological injuries as a result of the accident that would warrant his removal from the MIG.

[29] The Tribunal has also determined that chronic pain with functional limitations or a psychological condition may warrant removal from the MIG. In all cases, the



burden of proof lies with the applicant to demonstrate on a balance of probabilities that their injuries are not minor, or they have a pre-existing condition that would prevent maximal recovery within the MIG.

- [30] The applicant submits that he experienced psychological injuries caused by the accident which can not be treated within the limits of the Minor Injury Guideline (MIG). The applicant relies on the CNR's of Dr Patrick Chiu, in addition to the treatment plan prepared by Dr. Sharleen McDowell of Perfect Choice Psychological Services, submitted on May 6, 2021.
- [31] In support of the respondent's submission that the applicant provided unreliable evidence of psychological injuries caused by the accident, it is submitted that, in the CNR's of Dr Patrick Chiu dated April 8, 2021, the applicant described being a patient of Dr. Ivy Lee, a psychiatrist, alleged by the applicant to be treating him for Post Traumatic Stress Disorder (PTSD) symptoms, anxiety and insomnia. However, Dr. Lee's office responded to inquiries regarding the applicant's condition in a letter dated January 6, 2023, stating that at no point in time has the applicant been a patient of Dr Lee's.
- [32] I find, given the applicant's false assertion of being a patient of Dr. Lee, and the absence of other medical support, the applicant's evidence respecting his psychological impairments, consisting of post traumatic stress disorder, anxiety with driving, and insomnia are unreliable.
- [33] The applicant submits that Dr. Chiu diagnosed the applicant with PTSD, anxiety and insomnia, and that Dr. Chiu prescribed psychotherapy, whereas the notes indicate that Dr. Chiu did not diagnose the applicant and that he made a referral for psychotherapy at the applicant's request. The applicant reported the psychological impairments in the CNR's of Dr. Chiu, stating Dr. Lee offered the diagnosis not Dr. Chiu, when in fact the applicant was at no point in time an actual patient of Dr. Lee's.
- [34] Dr. Sharleen McDowell prepared a treatment plan, dated May 6, 2021, which set forth the injury and sequelae in part 6, which would be investigated for the purpose of the proposed psychological assessment with psychological testing described in part 9(b) of the treatment plan. The treatment plan does not offer a diagnosis but proposes a psychological assessment including testing to assess the applicant's psychological impairments caused by the accident, if any exist. The applicant has failed to offer medical evidence which satisfies me that he has psychological injuries as a result of the accident, which are more than minor sequelae treatable within the limits of the MIG. I do not find the medical evidence of psychological impairments in Dr. Chiu's CNRs offers a medical diagnosis of

any psychological impairments rather it represents Dr Chiu recording what the applicant stated was the alleged diagnosis by Dr. Lee, who never treated the applicant as a patient.

- [35] The IE Psychological Evaluation of Dr Mehdi Latfalizadeh, dated November 8, 2021, opines following psychological testing that the applicant does not suffer from a diagnosable psychological disorder, as a result of the accident. Dr. Mehdi Latfalizadeh did not identify the applicant showing any psychological impairment as a direct result of the accident which would prevent the applicant from maximal medical recovery within the MIG. I found the evidence of Dr. Latfalizadeh consistent with the preponderance of the other evidence presented. I found the report well supported by the examination conducted and the testing done. I accept Dr. Latfalizadeh's conclusion that the applicant does not suffer from a diagnosable psychological disorder as a result of the accident.
- [36] I find the applicant has not met his burden by providing medical evidence that any psychological impairments which are a result of the accident are not treatable within the MIG.

## **Conclusion**

- [37] The applicant has failed to meet his burden to demonstrate that he experiences chronic pain syndrome or psychological injuries caused by the accident which would remove him from the MIG. As described, the applicant's physical injuries which are a result of the accident have resolved and the applicant did not provide any compelling medical evidence that he will be prevented from maximal recovery from minor injuries if he is subject to the \$3,500.00 limit under the MIG. Having determined that the applicant has not demonstrated that removal from the MIG is required, an analysis of whether the treatment and assessment plans in dispute are reasonable and necessary is not required, as the MIG limits have been exhausted.

**OCF-6/ Expense Claim Form (OCF-6) dated April 9, 2021, Medical Appointments with Dr. Vincent Kwong & Dr. Patrick Chiu; OCF-6/ Expense Claim Form (OCF-6) dated June 11, 2021, for Medication Meloxicam prescribed by Pacific Medical Pharmacy;**

- [38] Section 15(1) of the Schedule sets forth that subject to section 18, medical benefits shall pay for all reasonable and necessary expenses incurred by or on behalf of the insured person as a result of the accident for, medication, and other goods and services of a medical nature that the insurer agrees are essential for

the treatment of the insured person, and for which a benefit is not otherwise provided in this Regulation.

- [39] The explanation of benefits (EOB) by the respondent respecting the two physician's appointments with Dr. Vincent Kwong on November 8, 2021, and Dr. Chiu, on April 8, 2021, were denied by reason of the visits being coverage by OHIP for Ontario residents, however, the applicant submits that he was an international student without OHIP coverage at the time of the physician's appointments. The applicant submits that he had insurance coverage at all material times from a collateral provider: Tugo Insurance Company. The CNR dated June 10, 2021, by Dr. Chiu, sets forth that the prescription for meloxicam was made contemporaneous with the applicant's complaints of lower back pain.
- [40] The applicant is claiming expenses in the amount of \$160.00 provided by way of an Expense Claim Form ("OCF-6") dated April 9, 2021, relating to physician appointments; and expenses in the amount of \$17.83 for the medication meloxicam, by way of an Expense Claim Form ("OCF-6") dated June 11, 2021. The respondent submits that the applicant received Tugo Insurance coverage at all material times pertaining to the expenses denied. The respondent submits that section 47(1) and (2) of the Schedule, permit an insurer to deduct amounts payable to an insured for payment of medical, rehabilitation benefits for the portion of an expense available to an insured under any insurance plan or law. The respondent submits that the applicant failed to submit any evidence that the OCF-6s were submitted to the collateral benefits provider Tugo Insurance, and as a result the respondent is unable to determine the amount payable to the applicant. The respondent submits that it is not required to pay either of the OCF-6/ Expense Claim Forms until the applicant shows that these expenses were made to the collateral benefits provider. I agree with the respondent's submission regarding the requirement to demonstrate that these expenses were submitted to the collateral benefits provider to deduct payment which is reasonably available under any insurance plan.
- [41] The applicant did not include submissions in its reply directed at the deficiency in the applicant's evidence related to disclosure of expenses submitted to the collateral benefits provider, Tugo Insurance Company. I, therefore, agree with the respondent that the applicant has not met his burden by providing sufficient evidence to demonstrate entitlement to the expenses listed in the OCF-6s for the purpose of the invoiced visits to Dr. Vincent Kwong and Dr. Chiu, and the medication meloxicam. I find that the respondent is not required to pay any amount of the expense claims until the applicant has provided the respondent

with proof of submission to the collateral benefits provider Tugo Insurance pursuant to section 47(1) and (2) of the Schedule.

- [42] I find that the applicant has not met his burden to show that the OCF-6/ Expense Claim Form (OCF-6) in the amount of \$160.00, dated April 9, 2021, pertaining to medical visits to Dr. Vincent Kwong and Dr. Patrick Chiu, and, in addition, the OCF-6 Expense Claim Form, in the amount of \$17.83 for medication dated June 11, 2021, are payable pursuant to section 47(1) and (2) of the Schedule. I agree with the respondent that for the purpose of section 47(1) and (2) of the Schedule, an insurer may deduct amounts payable to an insured for the payment of medical, rehabilitation benefits for that portion of an expense available to an insured under any insurance plan or law. The applicant has failed to provide evidence that he submitted the expenses to his collateral provider Tugo Insurance Company, which was his collateral provider at all material times, thus satisfying the requirement of section 47(1) and (2) of the Schedule. In addition, the applicant did not direct his reply submissions to the issue of section 47(1) and (2) of the Schedule. The applicant has not directed me to any evidence that the OCF-6s were submitted to his collateral benefits provider. As such, I find that Economical Insurance Company is not required to pay any amount of the expense claims until the applicant has provided the respondent with proof of submission to the collateral benefits provider.

### **Interest**

- [43] Interest applies on the payment of any overdue benefits pursuant to s. 51 of the Schedule. Given that there are no benefits owed in relation to the treatment plans or expense claims in dispute, the applicant is not entitled to interest pursuant to s. 51 of the Schedule in relation to the treatment plans because his injuries are within the funding limits of the MIG, which is exhausted. The applicant is not entitled to the Expense Claims/ OCF-6s dated April 9, 2021, and dated June 11, 2021, because the applicant has not provided the respondent with proof of submission to the collateral benefits provider pursuant to section 47(1) and (2) of the Schedule.

### **ORDER**

- [44] I find that the applicant sustained minor injuries because of the accident, that are treatable within the MIG. The funding limit for the MIG has been exhausted.
- [45] The applicant is not entitled to any treatment plans in dispute.

- [46] The applicant is not entitled to the amount of \$160.00 in an OCF-6, submitted on April 9, 2021, because the applicant has not provided the respondent with proof of submission to the collateral benefits provider pursuant to section 47(1) and (2) of the Schedule.
- [47] The applicant is not entitled to the amount of \$17.83 for medicine from Pacific Medical Pharmacy, in an OCF-6, submitted on June 11, 2021, because the applicant has not provided the respondent with proof of submission to the collateral benefits provider pursuant to section 47(1) and (2) of the Schedule.
- [48] The applicant is not entitled to interest pursuant to s. 51 of the Schedule in relation to the treatment plans nor in relation to the Expense Claim Forms /OCF-6s dated April 9, 2021, and dated June 11, 2021.

**Released: December 22, 2023**



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**Janet Rowsell  
Adjudicator**