

THE REAL ESTATE COUNCIL OF ALBERTA

Case: 012157  
Process: A Hearing under Part 3 of the *Real Estate Act*  
Licensee: Angeline Vandhana Lal  
Class of License: Real Estate Associate & Mortgage Associate  
Registration: 4 Million.ca Inc. O/A Estateview & 1170245 Alberta  
Ltd o/a Dominion Lending Centres Global  
Document: NOTICE OF HEARING

TO: Angeline Vandhana Lal

A hearing is set to review allegations about your conduct. Read this entire document to see what you must do.

**Hearing Information**

Date: August 2, 2022 to August 12, 2022 – 9 full days  
Time: 9:30 a.m.  
Venue: Virtual Hearing  
Hearing Panel: [K.K] - Chair, Panel member  
[J.L] - Panel member (Licensee)  
[B.W] - Panel member (Licensee)

(Alternates: [A.B], [M.G] and [K.M])

Counsel for the Panel: Rita Aggarwala

**It is alleged that your conduct is deserving of sanction for breaching sections of the *Act* or Rules. Here are the details:**

- 1) You made representations and carried on conduct that was reckless and that misled or deceived any person or was likely to do so, contrary to s. 42(a) of the *Real Estate Act Rules*:
  - a. Gagandeep Singh's real estate and mortgage licenses have been suspended since November 30, 2020 due to four conduct investigations. You were aware of this.
  - b. On April 18, 2021, you introduced Gagandeep Singh as "Kuldeep" to NuVista and stated he was a licensee in your brokerage assisting you in representing the [CLIENT 1] in their purchase of [ADDRESS 1]. "Kuldeep" was actually a different licensee in her brokerage and you knew that Gagandeep Singh was not "Kuldeep" when making this representation to NuVista. You knowingly introduced Gagandeep Singh as a licensee to the builder despite knowing that he was suspended.
  - c. On or around early August 2021, you phoned NuVista to confirm that Gagandeep Singh was a licensee in your brokerage assisting her in representing the [CLIENT 2] in their purchase of [ADDRESS 2]. You knowingly introduced Gagandeep Singh as a licensee to the builder despite knowing that he was suspended.
  - d. During the transaction involving [ADDRESS 2], the [CLIENT 2] did not know that you were their representative. On September 3, 2021, the [CLIENT 2] signed a Mortgage Borrower Relationship Disclosure Document that Gagandeep Singh provided them and you added this document to your mortgage brokerage file. That same day, you signed an Exclusive Buyer Representation Agreement for this transaction, provided to you by Gagandeep Singh after the [CLIENT 2] had signed via DocuSign. By signing these agreements, you falsely represented that you were the [CLIENT 2] real estate and mortgage representative when in fact you had never met with nor spoken to them with Gagandeep Singh acting as your unlicensed delegate.
  - e. During the transaction involving [ADDRESS 3] the [CLIENT 3] did not know that you were their representative. On September 3, 2021, you signed an Exclusive Buyer Representation Agreement with the [CLIENT 3] to represent them in purchasing

[ADDRESS 3] Gagandeep Singh emailed this document to you to sign via DocuSign after the [CLIENT 3] had signed via DocuSign. When the [CLIENT 3] had signed, the brokerage representative fields were left blank. They thought they were signing with Gagandeep Singh as their representative and did not know who you were. On September 3, 2021, the [CLIENT 2] also signed a Mortgage Borrower Relationship Disclosure Document that Gagandeep Singh provided them and you added this document to your mortgage brokerage file. By signing these agreements, you falsely represented that you were the [CLIENT 3] real estate and mortgage representative in the [ADDRESS 3] transaction when in fact you had never met with nor spoken to them with Gagandeep Singh acting as her unlicensed delegate.

- f. During the transaction involving [ADDRESS 4], the [CLIENT 3] did not know you were their representative. On August 19, 2021, you signed an Exclusive Seller Representation Agreement with the [CLIENT 3] to represent them in selling their property located at [ADDRESS 4]. The clients were not present when you signed this document but rather Gagandeep Singh sent them the document to sign via DocuSign and then sent the document to you to sign. By signing these agreements, you falsely represented that you were the [CLIENT 3] real estate and mortgage representative in the [ADDRESS 4] transaction when in fact you had never met with nor spoken to them with Gagandeep Singh acting as your unlicensed delegate.

2) You participated in fraudulent and unlawful activities in connection with the provision of your services through your reckless indifference to being used by an unlicensed individual, contrary to s. 42(b) of the *Real Estate Act Rules*:

**a. Fraudulent Activities**

- i. Gagandeep Singh's real estate and mortgage licenses have been suspended since November 30, 2020 for conduct matters. You were aware of this.
- ii. On April 18, 2021, you introduced Gagandeep Singh as "Kuldeep" to the builder NuVista Homes and stated he was a licensee in your brokerage assisting you in representing the [CLIENT 1] in their purchase of [ADDRESS 1]. Gagandeep Singh did the showing, purchase contract negotiations, and signing of transaction documents with the [CLIENT 1] in this matter. You did this despite knowing he

was not licensed and that Kuldeep was a different licensee in your brokerage. You signed a realtor registration form for this purchase on April 19, 2021 and an Exclusive Buyer Representation Agreement on April 28, 2021.

- iii. On May 9, 2021, during the transaction involving [ADDRESS 1] Gagandeep Singh dropped off a fraudulent mortgage pre-approval letter to NuVista Homes on a letterhead bearing a similar name your mortgage brokerage ("Dominion Lending Centre"). The author of this letter does not exist. NuVista relied on this letter to remove conditions that same day.
- iv. Gagandeep Singh was able to engage in fraud in this transaction due to you recklessly introducing him as a licensee and letting him provide services that only a licensee can, despite knowing that he was suspended.
- v. On or around early August 2021, you phoned NuVista Homes to confirm that Gagandeep Singh was a licensee in your brokerage assisting you in representing the [CLIENT 2] in their purchase of [ADDRESS 2]. Gagandeep Singh did the showing, purchase contract negotiations, and signing of transaction documents with the [CLIENT 2] in this matter. The [CLIENT 2] did not know you were their representative. On September 3, 2021, the [CLIENT 2] signed a Mortgage Borrower Relationship Disclosure Document that Gagandeep Singh provided them and you added this document to your mortgage brokerage file. That same day, you signed an Exclusive Buyer Representation Agreement for this transaction, provided to you by Gagandeep Singh after the [CLIENT 2] had signed via DocuSign.
- vi. On August 26, 2021, during the transaction involving [ADDRESS 2], Gagandeep Singh dropped off a fraudulent mortgage pre-approval letter to NuVista on a letterhead bearing a similar name to your mortgage brokerage ("Dominion Lending Centre"). The author of this letter does not exist. NuVista relied on this letter to remove conditions on August 31, 2021.
- vii. On October 1, 2021, the [CLIENT 2] entered into a mortgage agreement with Higrade Inc. Gagandeep Singh told them

this was a private bank. They did not know that Higrade Inc was actually Gagandeep Singh's company. The [CLIENT 2] unknowingly made monthly payments to Gagandeep Singh under this mortgage for four months for a total of \$17,750 and unknowingly paid him \$20,000 to get out of the mortgage in or around February 2022. The [CLIENT 2] thought these payments went to Higrade Inc but Gagandeep Singh actually kept the money.

- viii. Gagandeep Singh was able to engage in fraud in this transaction due to you recklessly introducing him as a licensee and letting him provide services that only a licensee can, despite knowing that he was suspended.
- ix. You acted in complete disregard for your professional responsibilities and allowed Gagandeep Singh to use you so he could commit fraud.
- x. You provided Gagandeep Singh blank Consumer Relationship Guides and Exclusive Buyer Representation Agreements to explain and sign with the [CLIENT 1] and [CLIENT 2] despite him being unlicensed.
- xi. You took little to no steps to inquire about the legitimacy of these transactions, failing to protect your clients and exposing them and the builder to financial loss and fraud.

**b. Unlawful Activities**

- i. You facilitated Gagandeep Singh's unlawful activity wherein he breached section 17 of the *Real Estate Act* by engaging in unlicensed activity as outlined above.
  - ii. You facilitated the [CLIENT 2] unlawful breach of section 38(4) of the *Act* by instructing them to fail to cooperate with a RECA investigation, including visiting their home to tell them not to cooperate with the investigation and drafting an email for them to send to RECA indicating that they would not cooperate.
- 3) You failed to ensure that clients, customers, and the public have full knowledge that your unlicensed assistant is unlicensed, contrary to s. 46(3) of the *Real Estate Act Rules*:

- a. On April 18, 2021, you introduced Gagandeep Singh as “Kuldeep” to NuVista and said that he was a real estate associate licensed at your brokerage assisting you in representing the [CLIENT 1] in the [ADDRESS 1] purchase.
  - b. On or around early August 2021, you confirmed to NuVista that Gagandeep Singh was a real estate associate licensed at your brokerage assisting you in representing the [CLIENT 2] in the [ADDRESS 2] purchase.
  - c. You knew that Gagandeep Singh was not licensed since November 30, 2020.
  - d. NuVista incorrectly believed that Mr. Gagandeep Singh was licensed because of your statements.
  - e. Gagandeep Singh represented your clients on two transactions with NuVista while suspended.
- 4) You allowed an unlicensed individual to perform tasks that must only be performed by a licensee, contrary to s. 46(2) of the *Real Estate Act Rules*:
- a. **[CLIENT 1]**
    - i. On May 9, 2021, the [CLIENT 1] completed their purchase of [ADDRESS 1]. Despite being their representative on all the paperwork, you did not do any showings, property verification, client relationship document explanation/ signing, or contract negotiations during this transaction. Gagandeep Singh did the showings, property verification, or contract negotiations during this transaction while suspended.
  - b. **[CLIENT 3]**
    - i. On September 3, 2021, you signed an Exclusive Buyer Representation Agreement with the Singhs to represent them in purchasing [ADDRESS 3]. Gagandeep Singh emailed this document to you to sign via DocuSign after the [CLIENT 3] had signed via DocuSign. When the [CLIENT 3] had signed, the brokerage representative fields were left blank. They thought they were signing with Gagandeep Singh as their representative and did not know you. On September 3, 2021, the [CLIENT 2] also signed a Mortgage Borrower Relationship Disclosure Document that

Gagandeep Singh provided them and you added this document to your mortgage brokerage file.

Gagandeep Singhs emailed to the [CLIENT 3] to sign on April 28, 2021.

- ii. On April 28, 2021, you pulled credit checks for each of the [CLIENT 3] and submitted a mortgage application for the [CLIENT 3]. The [CLIENT 3] thought Gagandeep Singh was the one doing these services for them, not you.
- iii. On June 4, 2021, the [CLIENT 3] completed their purchase of [ADDRESS 3] in Calgary. The [CLIENT 3] thought that Gagandeep Singh was their real estate associate, did not meet you until after the transaction during the investigation, and did not know you were their associate. You did not do any showings, client identification, client relationship document explanation/signing, property verification, or contract negotiations during this transaction. Gagandeep Singh did all these tasks while unlicensed.
- iv. On August 19, 2021, you signed an Exclusive Seller Representation Agreement with the [CLIENT 3] to represent them in selling their property located at [ADDRESS 4] The clients were not present when you signed this document but rather Gagandeep Singh sent them the document to sign via Docusign and then sent the document to you to sign. You did not do any showings, client identification, client relationship document explanation/signing, property verification, or contract negotiations during this transaction. Rather, Gagandeep Singh did all these tasks while suspended.

c. [CLIENT 2]

- i. On May 9, 2021, the [CLIENT 2] completed their purchase of [ADDRESS 2]. The [CLIENT 2] thought that Gagandeep Singh was their real estate associate, did not meet you until after the transaction, and did not know you were their associate. You did not do any showings, client identification, client relationship document explanation/signing, property verification, or contract negotiations during this transaction.

- d. You allowed an unlicensed individual, Gagandeep Singh, to communicate with your clients on your behalf in these transactions.
  - e. You allowed an unlicensed individual, Gagandeep Singh, to negotiate and monitor your clients' real estate transaction on your behalf in these transactions.
  - f. You allowed Gagandeep Singh to show the properties in these transactions.
- 5) You failed to fulfil your fiduciary obligation to your clients, contrary to s. 41(d) of the *Real Estate Act Rules*:
- a. You did not do any showings, property verification, client relationship document explanation/signing, or contract negotiations during the [CLIENT 1] purchase of [ADDRESS 1] and allowed an unlicensed individual to do so, exposing the [CLIENT 1] and NuVista to fraud. Your introduction of Gagandeep Singh as a licensed associate assisting you allowed him to submit a fraudulent mortgage pre-approval letter in this transaction which NuVista relied on to remove conditions, exposing the [CLIENT 1] to liability and a possible unenforceable purchase contract;
  - b. You did not do any showings, property verification, client relationship document explanation/signing, or contract negotiations during the [CLIENT 3] purchase of [ADDRESS 3] and the [CLIENT 3] listing of [ADDRESS 4], and allowed an unlicensed individual to do so. You submitted their mortgage application without the [CLIENT 3] knowing that you were their representative. The [CLIENT 3] incorrectly believed that Gagandeep Singh was their licensed representative, due to you facilitating his unlicensed activity;
  - c. You did not do any showings, property verification, client relationship document explanation/signing, or contract negotiations during the [CLIENT 2] purchase of [ADDRESS 2] and allowed an unlicensed individual to do so, exposing the [CLIENT 2] and NuVista to fraud. Your introduction of Gagandeep Singh as a licensed associate assisting you allowed him to submit a fraudulent mortgage pre-approval letter in this transaction which NuVista relied on to remove conditions, exposing the [CLIENT 2] to liability and a possible unenforceable purchase contract. Your facilitation of Gagandeep Singh's unlicensed



activity also allowed him to deceive the [CLIENT 2] into signing a mortgage with him and to make mortgage payments to him, leading to a financial loss of \$37,750;

### **Why You Should Attend the Hearing**

The hearing is your opportunity to respond to the allegations and state your side of the case in front of the Panel.

### **Learn About the Hearing Process**

Please read these guides on the RECA website:

- *Hearing and Appeal Practice and Procedures Guideline and*
- *Guide for How to Represent Yourself at a Real Estate Council of Alberta Hearing or Appeal Panel*

*Both are found on the RECA Website: RECA>Complaints & Discipline>Hearing Information and Procedures*

### **What You Should Bring to the Hearing**

Bring any witnesses and evidence you want the Panel to consider, with you to the hearing.

### **What Will Happen If You Don't Attend**

If you do not attend the Panel may proceed to make a decision without you.

### **What Will Happen At the Hearing**

After hearing all evidence and argument the Panel will decide whether the Executive Director has proven any of the breaches. If no breach is proven you will face no sanction.

If the Panel finds a breach is proven the Panel may do one or more of the things listed in **section 43** of the *Real Estate Act*:

- Cancel or suspend your license

- Order you to pay a fine for each breach
- Order you to pay the cost of the investigation and the hearing
- Order you to complete an education course

### **Submitting Written Arguments After the Hearing**

You can provide written arguments at the end of the hearing or after the end of the hearing

You must provide these to the **Hearings Administrator** and **Counsel for the Registrar** (contact information below) **no later than 15 days after the end of the Hearing**.

Contact the Hearing Administrator if you need more time.

### **You Can Get Legal Advice**

You may get legal advice and may be represented by legal counsel at the hearing.

If you do not have a representative please read *Information for Unrepresented Industry Members*:

<http://www.reca.ca/industry/content/publications-resources/guides.htm>.

### **If You Object to a Panel Member**

Please review who is on the Panel. If you object to any of the people being on the Panel, you must advise the Hearings Administrator **who you object to and why within 14 days** of receiving this Notice.

If you do not object to the Panel within 14 days, this Panel will conduct the hearing.

## Postponing the Hearing

If you are not available on the date set for the hearing you can apply to the Panel for a new date. Contact the lawyer for the Registrar and the Hearings Administrator as soon as possible if you need a new date.

Dated at Calgary, Alberta, on July 11, 2022  
(date)

### "SIGNATURE"

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Charles Stevenson, Registrar  
of the Real Estate Council of Alberta  
Contact Information

Hearings Administrator: Email: <a href="mailto:hearingsadmin@reca.ca">hearingsadmin@reca.ca</a> Fax: 403 228 3065 Direct: 403 685 7913 Toll Free: 1 888 425 2754 Address: Real Estate Council Suite 202, 1506 11 Avenue SW Calgary, Alberta T3C 0M9	Lawyer for the Registrar Email: <a href="mailto:conductadmin@reca.ca">conductadmin@reca.ca</a> Fax: 403 228 3065 Direct: 403 685 7944 Toll Free: 1 888 425 2754 Address: Real Estate Council Suite 202, 1506 11 Avenue SW Calgary, Alberta T3C 0M9
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