

THE REAL ESTATE COUNCIL OF ALBERTA

Case Number: 012676.001  
Name on License: Vipul Dhawan  
License Sector and Class: Mortgage Associate  
Current Brokerage: 9191712 Canada Inc. o/a Dominion Lending Centres "Mortgages Are Marvellous"  
Conduct Brokerage: Enrich Mortgage Group Ltd. o/a Mortgage Alliance – Enrich Mortgage Group  
Process: A Hearing under Part 3 of the *Real Estate Act*

NOTICE OF HEARING

TO: Vipul Dhawan

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

**Hearing Information**

Date: December 12, 2024  
Time: 9:30 a.m.  
Venue: Virtual Hearing  
Hearing Panel: [G.F]  
[K.M]  
[R.F]  
(Alternates: [A.T], [J.D], [C.S])

Counsel to the Panel: Anthony Dekens, Bishop & McKenzie LLP

**It is alleged that the following conduct is deserving of sanction:**

1. On or about December 10, 2021, you physically, sexually, or emotionally abused a licensee, [J.A] contrary to s. 42(f) of the *Real Estate Act Rules*:

- a. You grabbed [J.A.]’s chest without consent.
2. On or around December 10 and 11, 2021, you engaged in conduct that undermined public confidence in the industry, or brought the industry into disrepute, contrary to s. 42(g) of the *Real Estate Act Rules*:
    - a. You grabbed the chest of your [L.T], on two instances without consent.
    - b. You grabbed and squeezed [L.T]’s thigh without consent.

### **Virtual Hearings**

Hearings at RECA are conducted virtually. The Hearing Administrator will provide you with the Guide to Virtual Hearings and you will receive help in participating in the virtual process.

### **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

<https://www.reca.ca/complaints-discipline/hearings-information-procedures/>

- *Hearing and Appeal Practice and Procedures Guidelines and*
- *How to Represent Yourself at a Real Estate Council of Alberta Hearing or Appeal*
- *RECA Self-Represented Program*

### **Before the Hearing**

You will receive full disclosure of all evidence gathered by the Registrar relevant to the allegations in this Notice of Hearing for your review. This disclosure is for use in the conduct proceedings only and you may not use it for any other purpose.

You are also invited to meeting with Counsel for the Registrar prior to the hearing to consider entering agreement on non-contested matters such as:

- An admission of conduct deserving of sanction

- An agreement on facts
- An agreement on breaches
- An agreement on a finding of conduct deserving of sanction
- An agreement on sanction and/or costs.

Admissions or agreements can reduce the time and costs of the hearing.

### **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 Registrar 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 authorization
- 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 Evidence**

You can ask the Panel to allow you to provide written arguments at the end of presentation of evidence. The Panel will give directions on how this may be done.

### **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 Licensees here:

<https://www.reca.ca/complaints-discipline/hearings-information-procedures/>

### 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 November 22, 2024.  
(date)

### “Signature”

Warren Martinson, Registrar  
Real Estate Council of Alberta

### Contact Information:

Hearings Administrator:	Administrator for Counsel for the Registrar:
Email: <a href="mailto:hearingsadmin@reca.ca">hearingsadmin@reca.ca</a>	Email: <a href="mailto:conductadmin@reca.ca">conductadmin@reca.ca</a>
Fax: 403 228 3065	Fax: 403 228 3065
Direct: 403 685 7913	Direct: 403 685 7944
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