



Citation: *Kaur v. Registrar, Trust in Real Estate Services Act, 2002*, 2026 ONLAT TRESA 18457

Licence Appeal Tribunal File Number: 18457/TRESA

In the matter of an appeal from a Notice of Proposal to Revoke Registration by the Registrar under the *Trust in Real Estate Services Act, 2002*, S.O. 2002, c. 30, Sched. C

Between:

Paramjeet Kaur

Appellant

and

Registrar, *Trust in Real Estate Services Act, 2002*

Respondent

INTERIM DECISION AND ORDER

ADJUDICATOR: Jeffery Campbell, Vice-Chair

APPEARANCES:

For the Appellant: Paramjeet Kaur
Tajinder Kaur Sivia, Counsel

For the Respondent: Sania M. Cherian, Counsel
Robert Friedberg, Counsel

Held by videoconference: April 9, 2026

BACKGROUND

- [1] Paramjeet Kaur (the “appellant”) is registered under the *Real Estate and Business Brokers Act, 2002*, now the *Trust in Real Estate Services Act, 2002* (the “Act”), as a broker.
- [2] On March 10, 2026, the Registrar, *Trust in Real Estate Services Act, 2002* (“Registrar” or “respondent”) issued a Notice of Proposal (“NOP”) to revoke the appellant’s registration pursuant to s. 14 of the *Act*. On the same date, the Registrar also issued an Immediate Suspension Order (“ISO”) pursuant to s. 15 of the *Act*.
- [3] The appellant applied to the Tribunal for a hearing of the NOP by a Notice of Appeal dated March 20, 2026 (“NOA”).
- [4] The hearing commenced on April 9, 2026.

ISSUE

Extension of the ISO.

- [5] The issue to be determined is whether the expiry date of the ISO on the appellant’s registration should be extended until the conclusion of the hearing.
- [6] According to s. 15(3) of the *Act*, if a hearing is requested in respect of an NOP, the ISO expires 15 days after the written request for a hearing is received by the Tribunal, but the Tribunal may extend the time of expiration until the hearing is concluded if a hearing is commenced with a 15-day period. The hearing of this matter was originally scheduled to commence on April 1, 2026, within the 15 day period. However, the respondent requested, and was granted, an adjournment to today’s date. The appellant consented to the continuation of the ISO until today’s date.
- [7] I advised the parties at the commencement of the hearing that the evidence presented for the purposes of the extension of the ISO is not automatically evidence for the purposes of the hearing of the NOP appeal and will have to be presented again in its entirety should the hearing of the NOP appeal proceed. Further, since the determinations I must make with respect to the ISO are to be based on an incomplete presentation of the evidence, my factual determinations are not binding on the adjudicator who conducts the NOP appeal.

RESULT

- [8] I find that the ISO should be extended pursuant to section 15(3) of the *Act* until the conclusion of the NOP hearing.

ANALYSIS

- [9] The respondent bears the onus to establish that it is in the public interest that the ISO be extended pending the outcome of the hearing of the appeal of the NOP. To satisfy its onus, the respondent must establish that:
1. the conduct on which it relies occurred and forms a reasonable basis for the NOP and that the nature of the conduct; and
 2. the circumstances are such that it is a matter of public interest that the registration remain suspended pending the outcome of the NOP hearing.
- [10] The evidence presented at the hearing established that the appellant was employed as a real estate broker with Century 21 Peoples Choice Realty in the Greater Toronto Area.
- [11] The respondent submits that the appellant acted on behalf of a Nova Scotia developer known as Peppercorn Construction and Design Ltd. (“Peppercorn”), which marketed pre-construction properties across five subdivisions. According to the respondent, the appellant participated in transactions, including sales and referrals, involving approximately 100 Ontario clients and 181 transactions relating to the sale of and/or investment in the Peppercorn development located in Nova Scotia. The respondent further submits that these transactions were ultimately part of a Ponzi scheme, resulting in client losses exceeding \$4 million.
- [12] The appellant does not dispute the foregoing factual assertions. She further states that she anticipated receiving commissions for facilitating the transactions and/or providing referral services to Peppercorn. The appellant subsequently became aware that the transactions were fraudulent, resulting not only in substantial financial losses to her clients, but also losses to members of her own family. She submits that, although she did not personally invest in the properties, her involvement with Peppercorn led to the loss of numerous clients and a significant decline in her business revenues.
- [13] Derek Wilson, Investigator with the Real Estate Council of Ontario (“RECO”) testified on behalf of the respondent. Mr. Wilson testified that he was assigned to investigate the appellant after RECO received 4 related complaints with respect to the appellant concerning the appellant’s involvement with Peppercorn.
- [14] Mr. Wilson’s investigations revealed that, sometime after 2019, the appellant had created MLS listings for the Peppercorn lots in Nova. He testified that the appellant also advertised the project on radio encouraging potential buyers to contact her at her office. He further testified that his investigations revealed that the appellant met with clients at her office where she explained the opportunities, provided deposit banking information

and accepted cheques. During the course of his investigation, the appellant eventually provided him with the information with respect to the 181 transactions involving Peppercorn.

- [15] The respondent tendered an email dated November 17, 2020, from the Nova Scotia Real Estate Commission (“NSREC”) to the appellant, advising her that she was required to hold a licence in Nova Scotia to advertise the properties. The email further indicated that the appellant had been engaging in such advertising in Nova Scotia and that this activity constituted trading for which she was not licensed in that province.
- [16] The respondent also relied on a letter dated May 26, 2021, from the Real Estate Council of Ontario (“RECO”) to the appellant, advising that, following its investigation into complaints concerning the appellant and the Peppercorn transactions, the appellant was required to cease the activities that gave rise to those complaints.
- [17] Mr. Wilson testified that, even after receiving the November 17, 2020 email from NSREC the appellant facilitated 48 of the 181 transactions, and after receiving the May 26, 2021 letter from RECO she facilitated an additional six transactions.
- [18] Sylvia Skepple, a Registration Officer with the Real Estate Council of Ontario, testified on behalf of the respondent that the appellant’s involvement with Peppercorn resulted in substantial consumer losses. Ms. Skepple stated that, in her view, the appellant failed to conduct adequate due diligence in relation to the Peppercorn transactions, including failing to verify land ownership and to confirm local approvals and building permits. She further testified that the appellant did not heed the warnings issued by either NSREC or RECO and instead continued to facilitate trades and referrals, thereby contributing to additional consumer losses.
- [19] Ms. Skepple also testified that, upon further investigation, she concluded that of the 181 transactions, only 7 were reported to the appellant’s brokerage, as was required. Further, the appellant failed to notify her clients that she was representing both them (the purchasers/investors) as well as Peppercorn (the seller). Further, the appellant failed to ensure that client funds were held in trust prior to being paid to Peppercorn.
- [20] In an Interoffice Memo dated August 22, 2025, Ms. Skepple concluded,

“It appears [the appellant’s] sole motivation has been to generate as much commission, even at the expense of her clients and her own family members, Despite being notified by multiple provincial regulators that her activities were in contravention of their legislation, she continued to participate in activities with Peppercorn. Even continuing when the company failed to meet their obligations.”

- [21] The respondent submits that the appellant's involvement in the Peppercorn scheme discloses conduct that provides a reasonable basis for the NOP. It further submits that the nature of the conduct and the surrounding circumstances are such that it is in the public interest for the appellant's registration to remain suspended. The respondent argues that the appellant demonstrated a lack of understanding of fundamental aspects of real estate practice, including the reporting of trades, the performance of due diligence, and the protection of trust funds. It submits that the appellant facilitated and participated in a scheme that resulted in consumer losses exceeding \$4 million. Given the magnitude of those losses, the respondent submits that maintaining the suspension of the appellant's licence pending the conclusion of the hearing on the NOP is necessary to preserve public confidence in the real estate industry and is therefore in the public interest.
- [22] As noted, the appellant does not dispute the factual record. She testified that she was unaware that the Peppercorn program was fraudulent and that members of her own family were among those affected by the scheme. She further testified that her involvement with Peppercorn resulted in the loss of clients and the loss of income she otherwise would have earned. The appellant maintains that she considers herself, as well as her clients, to have been victims of the fraud.
- [23] With respect to due diligence, the appellant testified that she visited the Nova Scotia project on three occasions and that nothing she observed led her to believe the undertaking was fraudulent. In addressing the allegation that she failed to investigate property ownership or to confirm the status of building permits, the appellant testified that she had previously participated in pre-construction transactions and, in those circumstances, had not independently investigated the legitimacy of the projects or the developers involved.
- [24] I do not accept that the appellant's prior practice of failing to conduct due diligence to verify the legitimacy of pre-construction projects mitigates that failure in this case. To the contrary, the evidence before me highlights the importance, and indeed the necessity, of undertaking such due diligence.
- [25] With respect to the appellant's continued involvement with the Peppercorn development following warnings from NSREC and RECO, the appellant testified that she stopped advertising the properties after receiving the NSREC email. However, she also testified that she continued to present the Peppercorn development to prospective purchasers and investors thereafter, including after it became apparent that some earlier investors were not receiving the funds promised to them and despite having received the regulatory warnings. The appellant further testified that during this period she continued to expect to receive commissions for referrals made to Peppercorn.

[26] I find that, although the appellant may have reduced her involvement with Peppercorn and ceased advertising the properties following the issuance of warnings from NSREC and RECO, she nonetheless continued to expose consumers to risk by referring clients to a fraudulent project. As noted, the appellant does not dispute that 48 transactions occurred after the NSREC email and that a further six transactions took place after the subsequent RECO letter.

CONCLUSION

1. Reasonable basis for the NOP

[27] The appellant's failure to conduct adequate due diligence, together with her continued involvement with Peppercorn despite having received regulatory warnings, leads me to conclude that her conduct provides a reasonable basis for the NOP.

2. Public Interest

[28] With respect to the issue of public interest, the appellant relies upon the decision in *Bai v. Registrar, Real Estate and Business Brokers Act, 2002*, 2021 ONLAT REEBA 13216, in support of her position. In *Bai*, the Licence Appeal Tribunal concluded that it was not in the public interest for the suspension of the appellant's real estate broker registration to continue. However, I distinguish *Bai* from the matter before me. That case involved the conduct of a licensee in relation to a single client, whereas the present matter involves numerous consumers. Further, in *Bai*, the adjudicator did not find an ongoing pattern of conduct. In contrast, I have found that this appellant continued her involvement with Peppercorn despite receiving regulatory warnings, thereby establishing a continuing pattern of conduct.

[29] I conclude that it is in the public interest for the appellant's registration to remain suspended pending the conclusion of the hearing on the Notice of Proposal. The magnitude of the consumer losses arising from the appellant's conduct is such that lifting the suspension prior to a full hearing would risk undermining public confidence in the real estate industry.

Conclusion with respect to the ISO

[30] Having found that the Registrar has established that the conduct relied upon occurred and provides a reasonable basis for the Notice of Proposal, and further that the nature of the conduct and the surrounding circumstances justify maintaining the suspension in the public interest pending the outcome of the hearing, I order that the interim suspension order remain in effect until the conclusion of the appeal of the Notice of Proposal.

ORDERS

- [31] The ISO issued by the Registrar to the appellant on March 10, 2026 is extended to the conclusion of the hearing pursuant to section 15(3) of the *Act*.
- [32] The hearing with respect to the NOP is adjourned. A case conference for the hearing will take place on date to be set by the Tribunal
- [33] If the matter resolves prior to the upcoming case conference or the continuation of the hearing, the parties are required to notify the Tribunal in writing. If the appellant wishes not to continue with the appeal, the appellant must file a Notice of Withdrawal, available at <https://tribunalsontario.ca/lat/general-service/forms/> and serve a copy of that Notice on the Registrar and file a copy with the Tribunal.
- [34] Nothing in this Order affects any requirement under the *Act*.
- [35] I am not seized of this matter.

Dated: April 13, 2026

LICENCE APPEAL TRIBUNAL



**Jeffery Campbell
Vice-Chair**