



Clarification on Recent Disciplinary Decisions

The Commission has received feedback from registrants and the Saskatchewan REALTORS® Association (SRA) about our recent disciplinary decisions. We want to respond openly and provide clarity.

The Commission and the SRA

The Saskatchewan Real Estate Commission is an independent governing body created by provincial legislation to protect the public. We handle registration, professional standards, education, and investigation complaints against real estate agents. For more, see our [Consumer Information Guide](#).

The Commission consists of four members appointed by the Lieutenant Governor in Council who are not registered to trade in real estate in Saskatchewan, and seven or eight members who are. The Commission carries out its mandate with oversight from the Superintendent of Real Estate, an office within the Financial and Consumer Affairs Authority (FCAA) for Saskatchewan, appointed by the Minister to supervise administration of the provincial real estate legislation.

The SRA is a provincial trade association that represents REALTORS®. They work to promote their members' interests, offer training, and provide access to the MLS®. Membership is voluntary, whereas registration with the Commission is mandatory.

Registrants are those that are registered to trade in real estate in Saskatchewan under *The Real Estate Act* (the *Act*). They may also be known as real estate agents, real estate professionals, REALTORS®, real estate brokers, associate brokers, branch managers, salespeople, or property managers. The term REALTOR® is a trademark owned by the Canadian Real Estate Association, which is the national trade association for real estate professionals. Only CREA members can use this designation. All REALTORS® in Saskatchewan are registrants, but not all registrants are REALTORS®.

How Our Disciplinary Process Works

The *Act* sets out our disciplinary process, and you can find the details on our [website](#). The process is built on due process and fairness, because our role is to protect the public. These are not buzz words, and nor are transparency, accountability, and professionalism. The Commission takes this responsibility seriously. These same protections apply to registrants who are the subject of a complaint.

When a complaint is made against a registrant, they:

- have time to prepare a full response
- have time to get legal advice about their rights and obligations
- can choose to agree to the facts; to the facts and the charge; or to the facts, charge and sanction (a Consent Order). They can also agree to none of these and go to a formal hearing.

A consent order goes through more than one review. The Investigation Committee looks at the facts, the charge and the sanction, and decides whether the matter should go to a hearing panel. The hearing panel then determines whether the sanction is within the range of reasonableness.

This takes time, and time is afforded in order that decisions of a hearing panel can withstand scrutiny and appeal. Decisions that withstand scrutiny and appeal provide protection for the public. They also bring accountability and professionalism to the industry.

Our goal is a complete, fair, transparent and efficient process that arrives at a defensible result. In complex and unprecedented cases like the one at hand, this can be a difficult task. When ordering a sanction, the Commission considers the following principles:

- The nature and gravity of the breaches
- The role of the offending member in the breaches.
- Whether the offending member suffered or gained as a result of the breaches.
- The impact of the breaches on complainants or others.
- The need for specific deterrence to protect the public.
- The need for general deterrence to protect the public.
- The need to maintain the public's confidence in the integrity of the profession.
- The degree to which the breaches are regarded as being outside the range of acceptable conduct.
- The range of sanction in similar cases.

The purpose of administrative law generally, and the rules of procedural fairness specifically, is to ensure that a person is not punished by a tribunal on the basis of rumour, public sentiment, or the personal opinion of a person exercising authority under a statute. We rely on facts, not allegations.

Clarification About These Decisions

- The Commission regulates registrants. It does not regulate non-registrants, mortgage brokers, or appraisers or enforce securities law.
- The people and companies known as "InvestCo" in the decisions were not registrants. The FCAA issued a Temporary Cease Trade Order mentioned in our decisions.
- Our file numbers show the year a complaint was received and the order it came in. Files 2024-95 and 2024-96 were the 95th and 96th complaints opened in 2024.
- These matters began with an anonymous complaint. A full investigation was conducted. Given the volume of transactions involved, a fulsome investigation took significant time, but did not take five years.
- Before June 2024, the SRA did not provide transaction data when the Commission requested it, for this matter or for other files.
- The six-month suspensions form part of an overall sanction that also includes the maximum allowable statutory fine, required courses, ongoing audits and 2.5 years of strict registration conditions for Mr. Hallgrimson and Mr. Chavady to trade in real estate for brokerage.
- Mr. Hallgrimson and Mr. Chavady were terminated by their broker on October 1, 2026, and are not currently registered to trade in real estate in Saskatchewan.
- While the Commission regulates registration, that registration to trade in real estate is not active unless and/or until an individual is registered by a broker.
- Brokers are responsible for supervising the registrants who trade for their brokerage.
- Only those with real-time MLS® access can monitor which registrants are conducting trades, for what amount, and in what volume.
- The Commission does not have access to the MLS®.
- No members of the public made a complaint to the Commission with respect to this matter.

With respect to the evidence:

- InvestCo independently marketed properties, recruited buyers, and negotiated purchase prices prior to involving registrants, who prepared and processed documentation.

- The properties had professional appraisals completed, and no client complaints or lawsuits were reported regarding the transactions.
- By taking pre-negotiated terms directly from InvestCo to "paper" the transaction, the registrants violated Bylaw 702, which requires registrants to protect and promote the interests of their clients. They failed to provide independent advice, explain risks, explain limited dual agency, and/or disclose property details to buyers purchasing properties sight unseen and otherwise did not actively represent or protect their clients' interests.
- Additional breaches included drafting omissions, failure to handle condition removal deadlines properly, service agreement omissions, and providing misleading statements during the investigation regarding known property defects.
- The evidence demonstrated that Mr. Chavady and Mr. Hallgrimson's conduct constituted a complete lack of basic professional duties and representation but fell short of the demonstrating criminality.

Correspondence from the SRA

The Commission does not answer to the SRA. We recognize the SRA as one of our stakeholder groups. What the SRA states to be a "wholly inadequate response" are the most punitive sanctions on record in Saskatchewan. The Commission operates within legal limits and enforces *The Real Estate Act*, Regulations and Bylaws, not MLS® or SRA rules. The Commission is required to conduct fair, unbiased investigations and give registrants against whom complaints have been filed due process. We cannot rush or skip these strict legal steps to deliver prompt punishment. We recognize these same standards may not apply to private membership groups such as SRA.

To be transparent, we are sharing earlier correspondence between the SRA and the Commission:

- [Correspondence](#) with respect to the complaint and investigation process dated May 10, 2024, and May 27, 2024.
- [Correspondence](#) with respect to this matter from June 3 2024 and June 4, 2024.
- [Correspondence](#) with respect to education from August 17, 2026 and September 1, 2026.

You will note from the correspondence:

- The SRA indicated they were conducting their own investigation on this matter. The SRA is responsible to enforce the CREA Code of Conduct. The Commission has asked the SRA to publish its disciplinary decisions. The SRA has acknowledged its shared responsibility in protecting the public. Publishing disciplinary decisions is educational, a deterrent, and will help ensure REALTORS® are held accountable.
- That the Commission has requested that the SRA enter into a data sharing agreement so that the Commission can have access to transaction information in real time. This will allow the Commission to better assess risk in the industry, monitor transactions, and have a better understanding of the amounts each brokerage should be holding in trust.
- Regulators across Canada are seeking the same cooperation and information from provincial associations and local boards. Please see the recent [article](#) from Jean Lépine, Interim CEO for the Real Estate Council of Ontario (RECO).

We Welcome Feedback and Review

When the Office of the Auditor General of Ontario published its [report](#) on RECO in November 2022, the Commission adopted those recommendations where possible. In 2024 the SRA engaged, at its own expense, "senior legal counsel with decades of expertise in real estate, regulatory law, competition law, and governance to conduct an environmental scan" of areas of concern in

Saskatchewan, but we have not been provided with the results of the same. At its June 2026 meeting, the Commission moved to adopt, where applicable, the recommendations made in the Deloitte [review](#) of Real Estate Council of Alberta from April 2026.

The Commission welcomes feedback from all stakeholders and the opportunity for review. Feedback is fundamental to improvement. Continuous improvement is in the best interests of the public, the real estate industry, and will strengthen the Commission in its mandate of public protection and building consumer trust and confidence - for the benefit of consumers and registrants alike. We look forward to coordinating our efforts with the SRA on this shared goal and will look to meet in the near future.

Yours truly,

A handwritten signature in brown ink, appearing to read 'Aaron Tetu'.

Aaron Tetu
Executive Director/Registrar
On Behalf of the Commission

cc: Financial and Consumer Affairs Authority of Saskatchewan
Minister of Justice, Government of Saskatchewan
All Registrants
The Saskatchewan REALTORS® Association