

**DECISION OF
THE SASKATCHEWAN REAL ESTATE COMMISSION
AND CONSENT ORDER**

Royal Management Services Inc. (Re), 2026 SKREC 14

Date: September 24, 2026
Commission File: 2026-47

**IN THE MATTER OF
THE REAL ESTATE ACT, C. R-1.3 AND
IN THE MATTER OF ROYAL MANAGEMENT SERVICES INC.**

Before: A Saskatchewan Real Estate Commission Hearing Committee
comprised of the following:

Christopher Boychuk - Chairperson

Alberta Mak

Micheal Genest

CHARGE and ADMISSION OF MISCONDUCT:

[1] The registrant is charged with and is admitting to professional misconduct as follows:

Count 1:

That, contrary to section 39(1)(c) of *The Real Estate Act*, Royal Management Services Inc. breached *The Real Estate Act* Section 33(1)(b) by failing to notify the Commission in writing no later than five days after the closing of trust accounts.

LEGISLATION:

[2] Section 39(1)(c) of *The Real Estate Act* states:

“Professional misconduct is a question of fact, but any matter, conduct or thing, whether or not disgraceful or dishonourable, is professional

misconduct within the meaning of this Act, if...it is a breach of this Act, the regulations or the bylaws or any terms or restrictions to which the registration is subject.”

[3] Section 33(1)(b) of *The Real Estate Act* states:

“A brokerage shall notify the Commission in writing no later than five days after the occurrence of any of the following:

(b) the opening or closing of a trust account;”

FACTS:

- [4] In accordance with subsection 9(4) of The Real Estate Regulations (the “Regulations”), the Hearing Committee accepts Royal Management Services Inc.’s Statement of Facts and Admissions, which includes the following relevant points:
- [5] Royal Management Services Inc. (“RMS”) is a brokerage registered with the Commission, operating in both Saskatchewan and Alberta.
- [6] RMS has been continuously registered as a brokerage under the provisions of *The Real Estate Act* (the “Act”) in the Province of Saskatchewan with the Saskatchewan Real Estate Commission since September 9, 2020.
- [7] Curtis Way is presently registered under the provisions of the *Act* as the broker of RMS.
- [8] Mr. Way has taken the following real estate courses:
- Reciprocity Materials – Declaration.
- [9] Mr. Way has completed the continuing professional development seminars each registration year since 2020–2021.
- [10] Although the *Act* allows that trust monies held in connection with property management may be maintained within a pooled brokerage trust account, RMS’ procedure is to use separate interest-bearing trust accounts established in the name of individual clients as a matter of risk management and fiduciary responsibility.
- [11] On July 29, 2025, the brokerage filed written notice with the Commission of the closure of several trust accounts.

- [12] The July 29, 2025, letter noted seven trust accounts and the dates each were closed:
- i) Account A – closed June 21, 2024
 - ii) Account B – closed June 27, 2024
 - iii) Account C – closed June 27, 2024
 - iv) Account D – closed June 21, 2024
 - v) Account E – closed June 27, 2024
 - vi) Account F – closed June 21, 2024
 - vii) Account G – closed November 28, 2024
- [13] Each account was reconciled as part of the closure process and the records have been maintained.
- [14] RMS regrets its oversight in failing to notify the Commission within five days of the closure of each trust account.
- [15] The brokerage has taken steps to ensure compliance going forward with providing notice to the Commission of the opening and/or closing of trust accounts within the 5 days required by the legislation.

REASONS:

- [16] The Investigation Committee and Mr. Way, as broker on behalf of RMS, considered the following as relevant in agreeing to the within consent order:

Mitigating Factors

- [17] RMS does not have a previous sanction history.
- [18] RMS has proactively put procedures in place to ensure the Commission is notified of the opening and closing of all trust accounts within the prescribed timeline.

Aggravating Factors

- [19] Failure to provide trust account information to the Commission impedes the Commission's ability to provide oversight and regulate the real estate industry.

Prior Decisions & Other Considerations

- [20] In May of 2012, the Appeals Committee of the Real Estate Council of Ontario rendered a decision [*In the Matter of Suzette Thompson*](#) ("*Thompson*"). The Appeals Committee in *Thompson* set out a series of factors to be considered

when determining the appropriate sanction for a registrant found in breach of the legislation. The factors are as follows:

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

[21] These factors are reasonable considerations and can offer guidance to members of a Hearing Committee tasked with crafting an appropriate sanction for a registrant found to have committed professional misconduct. These factors have been consistently applied in Saskatchewan Real Estate Commission consent orders since September 2016.

1. The nature and gravity of the breaches of the Code of Ethics.

[22] In June of 2024, RMS closed six trust accounts and failed to provide notice to the Commission within five days as prescribed by the legislation. In November of 2024, RMS closed a further trust account, again without providing the required notice to the Commission. Information about trust accounts operated by a brokerage is fundamental information that the Commission must always have in order to fulfil its mandate to provide brokerage oversight and regulate the real estate industry.

2. The role of the offending member in the breaches.

[23] Mr. Way, the registered broker for RMS, was also involved in RMS's breach when he failed to ensure RMS notified the Commission in accordance with the legislation.

3. Whether the offending member suffered or gained as a result of the breaches.

[24] There is no evidence to suggest that the brokerage suffered a loss or enjoyed a benefit as a result of the breaches of the legislation.

4. The impact of the breaches on complainants or others.

[25] There is no evidence of actual consumer harm arising out of the brokerage's breaches of the legislation.

5. The need for specific deterrence to protect the public.

[26] Specific deterrence is needed to remind the brokerage of the importance of complying with the notification requirements set out in the legislation.

6. *The need for general deterrence to protect the public.*
- [27] General deterrence is needed to remind all registrants of the importance of understanding and complying with the notification requirements placed upon them by the legislation.
7. *The need to maintain the public's confidence in the integrity of the profession.*
- [28] Members of the public must have confidence in the ability of the Commission to provide oversight to brokerages and properly regulate the real estate industry.
8. *The degree to which the breaches are regarded as being outside the range of acceptable conduct.*
- [29] RMS's conduct falls below the standard expected of registrants, but it was not egregious.
9. *The range of sanction in similar cases.*

A. What is an appropriate sanction for Royal Management Services Inc.'s breach of 33(1)(b)?

- [30] There are no previous decisions dealing specifically with section 33(1)(b) of the Act, but the following decisions pursuant to section 33(1)(a) relate to the same notice requirement.
- [31] In *Royal LePage Martin Liberty (Sask) Realty (Re)*, [2025 SKREC 5](#) (file 2025-03), Royal LePage Martin Liberty (Sask) Realty ("RLM") was issued an order of reprimand and a \$3,000 fine for its breach of section 33(1)(a) for failing to notify the Commission when the brokerage moved.
- [32] Bradley Hardy, the broker for RLM, was in the Saskatchewan Real Estate Commission portal and realized he had not provided the Commission with the change of address when the brokerage moved. On January 9, 2025, Mr. Hardy advised the Commission that the brokerage had moved its main office location in June of 2023. The Commission had no record of the brokerage providing any notice of the move to the new office before Mr. Hardy's January 9, 2025, email.
- [33] Mr. Hardy discovered and self-reported his error, he acknowledged that it was his oversight and took full responsibility. The brokerage was co-operative with the investigation and Mr. Hardy had no previous sanction history.
- [34] While there were significant mitigating factors, the Hearing Committee recognized as an aggravating factor that the location of the office out of which a brokerage is trading in real estate is fundamental information that the Commission must have at all times.
- [35] Information about trust accounts operated by a brokerage is also fundamental information that the Commission must have at all times.

- [36] RMS's breach of the legislation is similarly serious to that of RLM. While both brokers failed to provide the required notice to the Commission with the result that both brokerages breached the legislation, Mr. Hardy self-reported the error, taking full responsibility for his oversight and Mr. Way acknowledged that RMS breached the legislation and was co-operative with the investigation. Further, RMS proactively put in place procedures to ensure future compliance with notice requirements.
- [37] In *Royal LePage Regina Realty (Re)*, [2022 SKREC 6](#) (file 2021-69), Royal LePage Regina Realty ("Regina Realty") was issued an order of reprimand and a \$2,500 fine for its breach of section 33(1)(a).
- [38] On or about August 10, 2021, Regina Realty moved its main office. The Commission was not provided with written notice of the change in the address within five days. The move was not discovered until October of 2021 when a Commission staff member was corresponding with the Office Manager for the brokerage.
- [39] While Mr. Duggleby had a previous sanction history for failing to provide notice to the Commission as required by the legislation, the brokerage was cooperative with the investigation and Mr. Duggleby admitted his error when contacted by Commission staff.
- [40] Mr. Duggleby was registered as a broker. As the people responsible for ensuring that the brokerage, and the registrants and employees of the brokerage are complying with the requirements set out in the legislation, brokers are held to a higher standard of conduct. The location of the office out of which a brokerage is trading in real estate is fundamental information that the Commission must have at all times.
- [41] RMS's breach of the legislation is similarly serious to that of Regina Realty's. While both brokerages failed to provide required notice to the Commission with the result that both brokerages breached the legislation, Regina Realty's failure to notify the Commission resulted in a single breach of the legislation, while RMS failed to notify the Commission of the closures of multiple trust accounts. However, RMS acknowledged its breach, was co-operative with the investigation and proactively put in place procedures to ensure compliance going forward.
- [42] An order of reprimand and \$4,000 fine are appropriate sanctions for Royal Management Service Inc.'s breach of Section 33(1)(b).
- [43] As Mr. Way, as broker on behalf of Royal Management Services Inc., has agreed to sign this consent order, there will be no order as to costs.

CONSENT ORDER:

- [44] In accordance with *The Real Estate Act*, its Regulations, and the Commission Bylaws, and with the consent of Mr. Way, on behalf of Royal Management Services Inc., and the Investigation Committee of the Saskatchewan Real Estate Commission, the Hearing Committee hereby orders:
- [45] With respect to Count 1, the charge of professional misconduct contrary to section 39(1)(c) of *The Real Estate Act* for breach of Section 33(1)(b):
- a. Royal Management Services Inc. shall receive an order of reprimand for the violation of Section 33(1)(b);
 - b. Royal Management Services Inc. shall, within 3 months of the date of this order, pay to the Saskatchewan Real Estate Commission a \$4,000 fine for the said violation of the *Act*; and
 - c. Royal Management Services Inc.'s registration shall be terminated if it fails to make payment as set out above.
- [46] There shall be no order as to costs.

Dated at Saskatoon, Saskatchewan, this 24th day of September, 2026.

Christopher Boychuk
Hearing Committee Chairperson