

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

Kramm (Re), 2026 SKREC 23

Date: October 14, 2026
Commission File: 2026-90

**IN THE MATTER OF
THE REAL ESTATE ACT, C. R-1.3 AND
IN THE MATTER OF SUSAN KRAMM**

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

Amy Groothuis - Chairperson
David Ukrainetz
Kayla McQueen

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*, Ms. Kramm breached *The Real Estate Act* section 18(1)(b), by trading in real estate as a broker while not registered as a broker.

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 18(1) states:

“No person shall trade in real estate:

...

(b) as a broker, unless the person is registered as a broker;”

FACTS:

- [4] In accordance with subsection 9(4) of The Real Estate Regulations (the “Regulations”), the Hearing Committee accepts Ms. Kramm’s Statement of Facts and Admissions, which includes the following relevant points:
- [5] Ms. Kramm was continuously registered as a salesperson under the provisions of *The Real Estate Act* in the Province of Saskatchewan with the Saskatchewan Real Estate Commission from April 30, 2009 to April 29, 2011.
- [6] Ms. Kramm has been continuously registered as a broker under the provisions of *The Real Estate Act* in the Province of Saskatchewan with the Saskatchewan Real Estate Commission since April 29, 2011, with the exception of the late renewal periods of July 1 to 3, 2022, July 1 to 2, 2024 and July 1 to 8, 2026.
- [7] Ms. Kramm has taken the following real estate courses:
- Phase 1 – Real Estate as a Professional Career;
 - Residential Real Estate as a Professional Career;
 - Farm Real Estate as a Professional Career;
 - Commercial Real Estate as a Professional Career; and
 - Real Estate Office Management & Brokerage.
- [8] Ms. Kramm has completed the continuing professional development seminars each registration year since 2009-2010.
- [9] Ms. Kramm is presently registered under the provisions of *The Real Estate Act* (the “Act”) as a broker with Kramm Realty Group (“Kramm Realty”).
- [10] Ms. Kramm’s 2025 – 2026 certificate of registration expired on June 30, 2026.
- [11] Ms. Kramm did not renew her certificate of registration for the 2026 – 2027 year prior to the expiration of the 2025 – 2026 certificate.
- [12] On July 9, 2026, Ms. Kramm renewed her certificate of registration for the 2026 – 2027 year.
- [13] A review of Ms. Kramm’s social media carried out by Commission staff prior to her becoming re-registered revealed the following:

- Realtor.ca profile with active listings;
 - BattlefordsRealEstate.com website;
 - Facebook profile and advertised listings;
 - YouTube account with advertising.
- [14] This is not the first time that Ms. Kramm has failed to renew her certificate of registration prior to expiry.
- [15] Ms. Kramm's 2021 – 2022 certificate of registration expired on June 30, 2022.
- [16] On July 4, 2022, Commission staff sent Ms. Kramm an email advising that her certificate of registration had expired, stating *"This email is to advise that you have missed the registration deadline and have not renewed your registration. As a result, your brokerage is not currently registered. No registrant at your brokerage is currently registered to trade in real estate. PLEASE NOTE: IF YOU INTEND TO OPERATE YOUR BROKERAGE YOU MUST REGISTER IMMEDIATELY."*
- [17] Ms. Kramm renewed her certificate of registration on July 4, 2022.
- [18] Although Ms. Kramm put money into the brokerage account on June 2, 2024, she did not complete her renewal and apply the funds. Ms. Kramm's 2023 – 2024 certificate of registration expired on June 30, 2024.
- [19] On July 3, 2024, Commission staff sent Ms. Kramm an email advising that her certificate of registration had expired and explaining that *"any marketing of properties or negotiation of offers you took part in between July 1 and the day before your registration is renewed constitutes unregistered trading, as would any social media profiles that include your listings or identify you as a registrant, such as a professional Facebook profiles or Instagram accounts, that were not taken down while you were unregistered."* The email also stated *"The Commission has elected not to pursue disciplinary charges against you at this time. That said, continued failures to renew your certificate of registration on time may result in a change in our position."*
- [20] Ms. Kramm renewed her certificate of registration on July 3, 2024.
- [21] This is now the third time that Ms. Kramm has failed to renew her certificate of registration prior to expiry.
- [22] On June 30, 2026, Commission staff sent Ms. Kramm an email notifying her that she had renewed the brokerage's certificate of registration but not her own and that she needed to log in to renew herself by the end of the day. That same day, she replied to that email "Thanks".
- [23] On June 30, 2026, Ms. Kramm logged into the Commission system and put the \$640 required for her renewal fee into the brokerage account. However, she did not complete the renewal process and apply the fee to her renewal.

- [24] On July 9, 2026, Commission staff sent Ms. Kramm an email advising that she was not registered. Mr. Kramm responded the same day stating “*The renewal was done June 30. I had done the brokerage and missed susan kramm. But went on line a [sic] paid june 30 evening.*” Commission staff replied, advising her that the brokerage had \$640 on its account, but that she was not registered.
- [25] On July 9, 2026, once Ms. Kramm learned that she had not applied the funds from the brokerage account to her renewal, she logged in and completed the process, renewing her certificate of registration for the 2026-2027 year.
- [26] On July 16, 2026, Ms. Kramm advised Commission staff that she had received the June 30, 2026 email and immediately logged into the SREC portal, completing what she believed was the renewal process and successfully paid her fee. Based on the successful payment, she believed her personal registration had been completed and she was unaware that her renewal was not finalized and further action was required.
- [27] While unregistered, Ms. Kramm’s existing online advertising remained active, she had two new active MLS® Listings appear on Realtor.ca, her website and social media platforms, and she had three previously scheduled property possessions.
- [28] Ms. Kramm acknowledges her responsibility to ensure that her registration is properly renewed each year, but she believed that she had fulfilled that obligation on June 30, 2026 when she completed the online renewal process and submitted payment.
- [29] While Ms. Kramm believed her registration was completed when she submitted payment, she did not complete the process.
- [30] Although Ms. Kramm believed that her personal registration had been completed when she put \$640 for the renewal fee into the brokerage account on June 30, 2026, she acknowledges that an additional verification of her registration status would have identified that the registration process remained incomplete. Ms. Kramm did not become aware that the June 30 payment had not completed her registration until SREC contacted her on July 9, 2026.
- [31] Ms. Kramm did not take steps to confirm her registration and did not realize she was unregistered until she received the July 9, 2026, email from Commission staff.

REASONS:

- [32] The Investigation Committee and Ms. Kramm considered the following as relevant in agreeing to the within consent order:

Mitigating Factors

[33] Ms. Kramm was co-operative with the investigation.

Aggravating Factors

[34] Ms. Kramm is a broker and, as those in charge of ensuring compliance of other registrants, brokers are held to a higher standard.

[35] Ms. Kramm has previously received a notice and warning for failure to renew on time and unregistered trading.

[36] Ms. Kramm has a previous sanction history, on an unrelated issue.

Prior Decisions & Other Considerations

[37] 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.

[38] 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.

[39] Ms. Kramm failed to renew her certificate of registration prior to expiry and continued to trade in real estate while not registered to do so. While Ms. Kramm has stated she believed her registration was completed when she successfully submitted payment, she did not finish the registration process, and her registration was not renewed. This is the third time that Ms. Kramm has failed to renew her certificate of registration prior to expiry.

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

[40] Ms. Kramm was the sole registrant involved in her breach of the legislation.

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

[41] There is no evidence to suggest that Ms. Kramm benefited from her breach of the legislation, nor is there any evidence that she suffered a loss.

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

[42] There is no evidence to suggest that any other parties were harmed by Ms. Kramm's breach of the legislation.

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

[43] Specific deterrence is needed to ensure Ms. Kramm understands that she is responsible for ensuring she completes the renewal process fully and before expiry of her certificate of registration.

6. The need for general deterrence to protect the public.

[44] General deterrence is needed to ensure that other registrants know that the Commission will not tolerate registrants continuing to trade in real estate after their certificate of registration has lapsed.

7. The need to maintain the public's confidence in the integrity of the profession.

[45] The public must be reassured that individuals trading in real estate are registered with the Commission to do so.

8. The degree to which the breaches are regarded as being outside the range of acceptable conduct.

[46] Ms. Kramm's conduct falls outside the range of acceptable registrant conduct, but her breach of the legislation was not egregious.

9. The range of sanction in similar cases.

A. What is an appropriate sanction for Ms. Kramm's breach of section 18(1)(b)?

[47] There are several previous and recent decisions dealing with a breach of s. 18(1).

[48] In *Harvey (Re)*, [2017 SKREC 11](#) (file #2017-08) ("Harvey"), George Harvey was issued an order of reprimand and \$2,000 fine for neglecting to renew his certificate of registration.

[49] Mr. Harvey is the broker and sole registrant of Wheatland Realty Ltd. His 2015-2016 certificate of registration expired on June 30, 2016. Mr. Harvey neglected to renew his certificate of registration for the 2016-2017 year. He did not realize that he had failed to renew his certificate of registration.

[50] On October 6, 2016, the sellers signed a listing agreement with Wheatland Realty Ltd. listing the property for sale. An advertisement was created and published with respect to the property.

- [51] On November 24, 2016 and December 9, 2016, Commission staff, sent an email to Mr. Harvey, at the email address he provided to the Commission, to inquire if he was acting as a broker. On January 30, 2017, Commission staff sent an email to the same email address attaching a letter advising that Mr. Harvey was not registered and that she had attempted to contact him on two previous occasions. Mr. Harvey received this email and contacted Commission staff immediately. Mr. Harvey became registered on January 30, 2017.
- [52] Mr. Harvey was co-operative with the investigation and signed a Statement of Facts and Admissions acknowledging his misconduct. There was no activity in Mr. Harvey's trust account during the period of time during which he was not registered. The property was not sold while Mr. Harvey was not registered, nor did he receive any offers to purchase during that time. At the time he failed to renew his registration, Mr. Harvey was ill for two weeks and was also dealing with his sister in Washington D.C. who had been diagnosed with Alzheimer's disease. Mr. Harvey does very few transactions per year and there are no other registrants working out of his brokerage.
- [53] Mr. Harvey was unregistered for seven months. He failed to respond to several emails from the Commission regarding his registration status. The ramifications of non-registration are significant: no REIX coverage for negligence and no defalcation coverage in the event of trust account violations.
- [54] Ms. Kramm's breach of the legislation is more serious than that of the registrant in *Harvey*. While Mr. Harvey was unregistered for a lengthy period of time, there were extenuating circumstances surrounding his failure to renew. Mr. Harvey was a broker, and the only registrant of his brokerage, and while he did list one property during that period, he was not otherwise involved in any trades in real estate. Ms. Kramm was unregistered for just 8 days, but she actively engaged in trade in real estate with active listings, advertising, and possession dates. Further, having previously failed to renew her certificate on time, Ms. Kramm had received prior notice from the Commission of the ramifications of allowing her registration to expire.
- [55] The decision in *Harvey* was issued prior to May 2020. In May of 2020, the provincial legislature amended s. 38 of *The Real Estate Act* to increase the maximum fines that can be ordered against registrants found guilty of professional misconduct or professional incompetence. The previous iteration of the legislation capped fines at \$5,000 for each finding up to a maximum of \$15,000 in the aggregate for all findings. The new maximum fine for each finding of professional misconduct or professional incompetence was increased to \$25,000 up to \$100,000 in the aggregate for all findings. While this legislative change does not invalidate the precedents to be found in previous hearing decisions, it must be taken as a strong signal from lawmakers that the fines ordered against registrants should be increased so as to ensure the protection of the public.

- [56] In *Bailey (Re)*, [2025 SKREC 22](#), (file 2025-61) ("*Bailey*"), Catherine Bailey was issued an order of reprimand and \$3,000 fine for breaching Section 18(1)(d) of the *Act* by trading in real estate as a salesperson while she was not registered as a salesperson when she failed to renew her registration on time.
- [57] Ms. Bailey failed to renew her certificate of registration for the 2025-2026 year prior to the expiration of her 2024-2025 certificate on June 30, 2025. Ms. Bailey renewed her certificate of registration for the 2025-2026 year on July 3, 2025. While unregistered Ms. Bailey continued to have active listings, advertisements and social media presence. Ms. Bailey previously failed to renew her certificate of registration. Her certificate of registration for the 2023-2024 year expired on June 30 2024 and she did not renew her certificate until July 2, 2024. Ms. Bailey received an email from the Commission with a notice and warning.
- [58] While Ms. Bailey was cooperative with the investigation and had no previous sanction history, this was the second year in a row Ms. Bailey failed to renew her registration before it expired and she previously received written notice and warning.
- [59] Ms. Kramm's breach of the legislation was more serious than that of the registrant in *Bailey*. While both registrants failed to renew on time, engaged in trade in real estate while unregistered, and previously received warnings from the Commission, Ms. Kramm is a broker and brokers are held to a higher standard.
- [60] In *MacDonald (Re)*, [2025-SKREC 23](#), (file 2025-63) ("*T. MacDonald*"), Tannis MacDonald was issued an order of reprimand and \$3,000 fine for breaching Section 18(1)(d) of the *Act* by trading in real estate as a salesperson while she was not registered as a salesperson when she failed to renew her registration before it expired.
- [61] Tannis MacDonald failed to renew her certificate of registration for the 2025-2026 year prior to the expiration of her 2024-2025 certificate on June 30, 2025. Tannis MacDonald renewed her certificate of registration for the 2025-2026 year on July 7, 2025. While unregistered Tannis MacDonald continued to have active listings, advertisements and social media presence. Tannis MacDonald previously failed to renew her certificate of registration. Her certificate of registration for the 2021-2022 year expired on June 30 2022 and she did not renew her certificate until July 7, 2022.
- [62] While Tannis MacDonald was cooperative with the investigation and had no previous sanction history, she had previously received an email from the Commission with a notice and warning.
- [63] Ms. Kramm's breach of the legislation was more serious than that of the registrant in *T. MacDonald*. While both registrants failed to renew on time, engaged in trade in real estate while unregistered, and previously received warnings from the Commission, Ms. Kramm is a broker and brokers are held to a higher standard.

- [64] In *MacDonald (Re)*, [2025 SKREC 2](#), (file 2024-57) (“*C. MacDonald*”), Catrina MacDonald, was issued an order of reprimand and \$4,000 fine for breaching Section 18(1)(b) of the *Act* by trading in real estate as a broker while she was not registered to do so. Catrina MacDonald was also issued an order of reprimand and \$4,000 fine for breach of Section 8(4) of *The Real Estate Regulations* by failing to respond to requests for information from the Commission.
- [65] Catrina MacDonald failed to renew her certificate of registration for the 2024-2025 year prior to the expiration of her 2023-2024 certificate on June 30, 2023. Catrina MacDonald renewed her certificate for the 2024-2025 year on July 2, 2024. Catrina MacDonald continued to have active social media profiles, continued to advertise as a registrant and remained listed as the broker for 2 Percent Realty Elite while she was not registered. This was the third time Catrina MacDonald failed to renew her registration before it expired and Catrina MacDonald received previous warnings.
- [66] Ms. Kramm’s breach is more serious than that of the registrant in *C. MacDonald*. Both registrants failed to renew on time, were engaged in trade in real estate while unregistered, and are brokers. While Ms. MacDonald had no previous sanction history, both had received previous warnings for failure to renew on time. However, Ms. MacDonald’s unregistered trade in real estate was limited to advertising that held her out to be a registrant, while Ms. Kramm continued to engage in transactions and have active listings while unregistered.
- [67] In *Nakarani (Re)*, [2024 SKREC 11](#), (file #2023-48) (“*Nakarani*”), Ms. Nakarani was issued an order of reprimand and a \$3,000 fine for breaching section 18(1)(d) of the *Act* by trading in real estate as a salesperson while she was not registered as a salesperson.
- [68] Ms. Nakarani failed to renew her certificate of registration for the 2023-2024 year prior to the expiration of her 2022-2023 certificate on June 30, 2023. Ms. Nakarani renewed her certificate on July 6, 2023. Ms. Nakarani continued to have active social media profiles continuing to advertise and remained listed as a REALTOR® on the Platinum Realty Specialists brokerage website while she was unregistered. During the time period that she was unregistered, Ms. Nakarani had 3 active listings.
- [69] While Ms. Nakarani had no previous sanction history, she had also failed to renew her registration before it expired the previous year and had been issued a notice and warning from the Commission.
- [70] Ms. Kramm’s misconduct is more serious than that of the registrant in *Nakarani*. While both registrants had previously been warned about trading in real estate after their certificates of registration expired, and continued to actively trade in real estate while unregistered, Ms. Nakarani had no previous sanction history. Ms. Kramm is also a broker, and brokers are held to a higher standard.

- [71] In *Strieb (Re)*, [2024 SKREC 10](#), (file #2023-47) ("*Strieb*"), Ms. Streib was issued an order of reprimand and a \$3,000 fine for breaching section 18(1)(d) of the *Act* by trading in real estate as a salesperson while she was not registered as a salesperson.
- [72] Ms. Strieb failed to renew her certificate of registration for the 2023-2024 year prior to the expiration of her 2022-2023 certificate on June 30, 2023. Ms. Strieb renewed her certificate on July 6, 2023. Ms. Strieb continued to have active professional social media profiles continuing to advertise and listings on the Re/Max of Swift Current brokerage website between July 1, 2023 and July 5, 2023 while she was unregistered.
- [73] Ms. Streib was co-operative with the investigation and had no previous sanction history.
- [74] Ms. Strieb had also failed to renew her registration before it expired the previous year and had been issued a notice and warning from the Commission.
- [75] Ms. Kramm's misconduct is more serious than that of the registrant in *Strieb*. Both registrants had previously been warned about trading in real estate after their certificates of registration expired, and continued to actively trade in real estate while unregistered. However, Ms. Strieb had no previous sanction history and Ms. Kramm is a broker which means she will be held to a higher standard.
- [76] In *Houston (Re)*, [2024 SKREC 9](#), (file #2023-45) ("*Houston*"), Ms. Houston was issued an order of reprimand and a \$3,000 fine for breaching section 18(1)(d) of the *Act* by trading in real estate as a salesperson while she was not registered as a salesperson.
- [77] Ms. Houston failed to renew her certificate of registration for the 2023-2024 year prior to the expiration of her 2022-2023 certificate on June 30, 2023. Ms. Houston renewed her certificate on July 4, 2023. Ms. Houston continued to run social media posts, have a professional social media presence and active listings on MLS® between July 1, 2023 and July 3, 2023 while she was unregistered.
- [78] Ms. Houston had also failed to renew her registration before it expired the previous year and had been issued a notice and warning from the Commission. Ms. Houston was co-operative with the investigation and had no previous sanction history. However, it was the second year in a row that Ms. Houston failed to renew her registration before it expired.
- [79] Ms. Kramm's misconduct is more serious than that of the registrant in *Houston*. Both Ms. Kramm and Ms. Houston had previously been warned about trading in real estate after their certificates of registration expired, and continued to actively trade in real estate while unregistered. However, Ms. Houston had no previous sanction history, and Ms. Kramm is a broker and must be held to a higher standard.

[80] A letter of reprimand and a fine of \$5,000 are appropriate sanctions for Ms. Kramm's breach of section 18(1)(b) of the *Act*.

[81] As Ms. Kramm has agreed to sign this consent order, there will be no order as to costs.

CONSENT ORDER:

[82] In accordance with *The Real Estate Act*, its Regulations, and the Commission Bylaws, and with the consent of Ms. Kramm, and the Investigation Committee of the Saskatchewan Real Estate Commission, the Hearing Committee hereby orders:

[83] 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 18(1)(b):

- a. Ms. Kramm shall receive an order of reprimand for the violation of section 18(1)(b);
- b. Ms. Kramm shall, within 3 months of the date of this order, pay to the Saskatchewan Real Estate Commission a \$5,000 fine for the said violation of the *Act*; and
- c. Ms. Kramm's registration shall be terminated if she fails to make payment as set out above.

[84] There shall be no order as to costs.

Dated at Regina, Saskatchewan, this 14th day of October, 2026.

Amy Groothuis
Hearing Committee Chairperson