

**IN THE MATTER OF THE *REAL ESTATE SERVICES ACT*,
S.B.C. 2004, c.42 as amended**

AND

**IN THE MATTER OF
ROBIN ANDREW BROWN
(164270)**

AND

**IN THE MATTER OF
ROB BROWN & ASSOCIATES CORP.
(X033795)**

REASONS FOR ORDER IN URGENT CIRCUMSTANCES

Date and Place of Hearing:	March 13, 2019 Office of Real Estate Council of British Columbia Vancouver, BC
Discipline Committee:	Elana Mignosa
Counsel for the Real Estate Council of British Columbia:	Patrick Gilligan-Hackett
Court Reporter:	Keith Bemister
Counsel for the Discipline Committee:	David Martin

Introduction

1. An ex parte hearing was held on March 13, 2019, pursuant to Sections 45 and 46 of the *Real Estate Services Act* (“RESA”) by a one-person discipline committee (the “Committee”) of the Real Estate Council of BC (the “Council”) to consider an application by the Council for certain Orders in Urgent Circumstances, including, among other things, suspending the licences of Robin Andrew Brown (“Mr. Brown”) and Rob Brown & Associates (the “Brokerage”).
2. Section 45(1) of the RESA provides that a discipline committee may act under this section if the committee considers that:
 - (a) there has been conduct in respect of which a discipline committee could make an order under Section 43 against a licensee,

- (b) the length of time that would be required to complete an investigation or hold a discipline hearing, or both, in order to make such an order would be detrimental to the public interest, and
 - (c) it is in the public interest to make an order under this section against the licensee.
- 3. Section 45(2) of the RESA provides if the factors set out in Section 45(1) apply, then the Committee may make certain orders, including suspending of the licences of the licensees concerned.
- 4. Section 45(3) of the RESA expressly authorizes a discipline committee to make an order under Section 45(2) "(b) without giving notice to the licensee" and "(c) without providing the licensee an opportunity to be heard". Unlike other regulatory statutes that are silent as to notice, these express provisions preclude any implied requirements that a discipline committee give a licensee notice of, or opportunity to respond to, an application for an order under Section 45(2). Instead, the RESA provides, under Section 45(6), a right of a licensee subject to such an order to deliver written notice to the Council "to require" a discipline hearing, apart from the Council's authority to initiate one.
- 5. Section 46 of the RESA provides that if the Committee considers it to be in the public interest and an order under Section 45 is made against a licensee, the discipline committee may make orders prohibiting the licensee from withdrawing any of the licensee's property, or any of it identified in the order, from the possession of another person named in the order who has the property on deposit, under control or for safekeeping. Further, the Committee may order the licensee to hold all property, or any of it identified in the order, that is in the licensee's possession or control in trust for various people identified in Section 46(2)(b).
- 6. Mr. Gilligan-Hackett acted as counsel for the Council. He presented one affidavit, that of Kasey Spracklin, a Senior Compliance Officer of the Council (marked Exhibit 1). That affidavit detailed many matters of alleged default by Mr. Brown and by the Brokerage including three Complaints, evidence that Mr. Brown and the Brokerage were absent from the address of the Brokerage, a Qualification Hearing, an absence from the Brokerage due to health issues, and homes listed for sale on a website where most had no identification of a selling agent on the signs at the homes.

7. The Committee reviewed the evidence and determined that the factors set out in Section 45(1) were all established.
8. Upon reading the affidavit marked Exhibit 1 and hearing submissions from legal counsel for the Council, the Committee issued an Order in Urgent Circumstances (the “Order”) on March 13, 2019, that the licences of Mr. Brown and the Brokerage be suspended effective immediately pursuant to Section 45(2) of the RESA, together with Orders providing that they cease dealing with certain financial institution accounts relating to the Brokerage and its clients, freezing those funds and requiring that they turn over to the Council their books and records. A copy of the Order is attached to these reasons, for ease of reference.
9. These are the written reasons for the Order.

Background

Licensing

10. The Brokerage holds licence number X033795 which was first issued on June 1, 2017 and which expires on June 1, 2019 (“Brokerage License”).
11. Under the Brokerage License, the Brokerage is licensed to offer trading services and rental property management services from premises located at 51-76 Dallas Road, Victoria, BC and subject to the condition that the Brokerage only engage the approved managing broker, being Mr. Brown, and one additional licensee who resides permanently at the premises of the Brokerage.
12. Mr. Brown holds licence number 164270 and was last licensed as a managing broker, trading services and rental property management services (“Individual Licence”). The Council first licensed Mr. Brown on May 8, 2012 as a representative, trading services and rental property management services.

Suitability for Licensing

13. On May 2, 2018 Mr. Brown applied for renewal of the Individual Licence.
14. In that month, the Council informed Mr. Brown that it had concerns about his suitability to be licensed arising from information the Council had received from the Real Estate Council of Ontario which suggested Mr. Brown might, from the time of his first

application to the Council to be licensed, have given misleading or untruthful answers to certain questions on the Council's licensing application form.

15. The Council told Mr. Brown that it had decided to continue the Individual Licence under Section 12 of the RESA pending the outcome of a review of his application and notification to Mr. Brown of the outcome of that review. The Council identified several potential outcomes to Mr. Brown including an outcome which would require the Council to hold a Qualification Hearing.
16. In a letter dated November 14, 2018 the Council informed Mr. Brown about the available courses of action regarding the Individual Licence and the Council's intended course of action.
17. Subsequently, the Council considered its intended course of action regarding the Individual Licence and decided to re-extend the Individual Licence under Section 12 of the RESA pending a Qualification Hearing.

First Complaint

18. On November 26, 2017 the Council received a complaint against Mr. Brown from xxxxxxxxx ("First Complaint"). The First Complaint alleged that Mr. Brown had hired and paid xxxxxxxx, who was not licensed under the RESA, to provide services for which a licence was required.

Second Complaint

19. On March 15, 2018 the Council received a complaint against Mr. Brown from xxxxxxx, a licensee, acting on behalf of the principal of Lucky Cat Holdings Ltd. ("Lucky Cat") ("Second Complaint"). The Second Complaint alleged that Mr. Brown had misrepresented to Lucky Cat that a numbered company, of which Mr. Brown was the principal had the lawful authority to sell certain lands owned by that company to Lucky Cat when Mr. Brown knew the Supreme Court of British Columbia had granted the right to sell the lands, which had been foreclosed, to a third party, being the mortgagee.

Third Complaint

20. On July 23, 2018 the Council received a complaint against Mr. Brown from xxxxxxxxxxx ("Third Complaint"). The Third Complaint alleged, firstly, that Mr. Brown had misrepresented himself as the owner of a residential property and

entered into a tenancy agreement with xxxxxxxxxx in relation to that property and secondly, that Mr. Brown had failed to return a damage deposit to xxxxxxx. The property had the same address as the licensed address for Mr. Brown and the Brokerage.

21. During its investigation of the Third Complaint, the Council learned that the landlord of 51-76 Dallas Road had undertaken proceedings in June 2018 to remove Mr. Brown as a tenant for non-payment of rent but that those proceedings were also the subject of an active judicial review proceeding in the Supreme Court of British Columbia.

Health Issues

22. From time to time in his dealings with the Council, Mr. Brown has stated he has health issues, which he characterizes in a manner which suggests they are serious.

Qualification Hearing

23. In December 2018, the Council decided to proceed with a Qualification Hearing and retained one of its external counsel, Patrick Gilligan-Hackett, to represent the Council at the Qualification Hearing and any disciplinary proceedings that might arise from the investigations of the First, Second and Third Complaints.
24. The Council instructed its lawyer to proceed as expeditiously as was reasonably possible with the Qualification Hearing for Mr. Brown.
25. On December 14, 2018, Mr. Gilligan-Hackett sent a letter to Mr. Brown concerning the Qualification Hearing to the email address he had provided to the Council in connection with his licence application and by registered mail to the Brokerage's licensed address. The registered mail letter was returned stamped "unclaimed".
26. On January 17, 2019, Mr. Brown acknowledged receiving the letter by email from his business email address and stated that he is under medical care and that "any kind of participation in such stressful hearing would require the clearance from my medical professionals beforehand" (sic).
27. On January 28, 2019, Mr. Gilligan-Hackett sent a letter to Mr. Brown in response. That letter was sent to the business email address and by registered mail to Mr. Brown at the licensed address for the Brokerage. No response to the letter was received from Mr. Brown. No response to the request for medical information was received from a

physician treating Mr. Brown. The letter was not returned from the business email address. The letter was sent by registered mail but was returned with no reason given.

28. On January 30, 2019, Mr. Gilligan-Hackett sent a letter to Mr. Brown to notify him that the dates for the Qualification Hearing had been revised from February 25-26, 2019 to March 28-29, 2019. The letter was sent to the business email address and by registered mail and regular mail to Mr. Brown at the licensed address for the Brokerage. The letter asked Mr. Brown to confirm receipt of the letter by email. No response was ever received from Mr. Brown and it was not returned from the business email address. The letter was also sent by registered mail but was returned with no reason given.
29. On March 5, 2019, two emails from Mr. Brown both of which originated from the business email address were received. The first enquired if the Council was willing to postpone the Qualification Hearing until after the BC Privacy Commission and the Ombudsperson investigations against the Council are completed. The second stated that he had not received copies or details pertaining to the Complaints nor a reply regarding his request for witnesses. It also referred to correspondence from the Privacy Commission and that he hoped that the Council would accommodate a postponement until the completion of that investigation.

Additional Attempts to Contact Mr. Brown

30. The Council sent emails to Mr. Brown at the business email address on each of January 30, February 15 and February 20, 2019 to confirm the Brokerage's address. On February 10, 2019 an employee of the Council received a voicemail from an anonymous caller telephoning from xxxxxxxxx providing a mailing address for Mr. Brown and the Brokerage of 52-76 Dallas Road. The number of the anonymous caller was not the number for the Brokerage in the Council's records. The Council did not receive a direct response from Mr. Brown to the emails or any other response except the February 10, 2019 voicemail.
31. Mr. Brown has filed a complaint against the Council with the Office of the Information and Privacy Commissioner ("OIPC Complaint"). In connection with the OIPC Complaint, Mr. Brown provided an address. That address is some distance from the Capital Regional District and was not provided to the Council for any purpose other than the OIPC Complaint. Mr. Brown has not supplied this address to the Council in connection with either the Brokerage Licence or the Individual Licence.

32. Mr. Brown said he had filed a complaint against the Council with the Ombudsperson. However, as of the date of the hearing, the Ombudsperson has not contacted the Council.

Current Investigation

33. In late February 2019, the Council decided to investigate the current status and location of Mr. Brown and the Brokerage based upon the foregoing as set out in the Affidavit of Kasey Spracklin.
34. On February 26, 2019, an employee of the Council reviewed the page for the Brokerage on the REALTOR.ca website. At that time, Mr. Brown's page showed nine listings including two commercial properties, one listed at \$17,500,000 and the other listed at \$18,000,000.
35. During a telephone call between an employee of the Council and xxxxxxxx (the Third Complaint) he said that he sublet a property which was a furnished two-bedroom apartment at 51-76 Dallas Road, Victoria from Mr. Brown in June 2018.
36. On February 27, 2019, the property manager of the address for the Licensed Brokerage was asked by an employee of the Council whether the property management company, CAPREIT, would allow a real estate brokerage to operate at 76 Dallas Road and he replied in the negative. He also informed the Council's employee that each unit at 76 Dallas Road is allowed to be used for a home office. However, the units themselves cannot be used to generate income such as through Airbnb, and that any sublets must be approved. He stated that he was aware that there was never signage at 76 Dallas Road pertaining to the Brokerage during Mr. Brown's tenancy. He said that Mr. Brown is no longer a tenant at Unit 51 and that new tenants moved in November 10, 2019 and that he arranged for Mr. Brown to be escorted off the property on October 30, 2018. An Order pronounced by the Supreme Court of British Columbia on October 24, 2018 in a proceeding in the Victoria Registry, Rob Brown v. CAPREIT was entered into evidence. The proceedings related to Mr. Brown's tenancy at 51-76 Dallas Road. The Order addressed the terms on which an Order of Possession issued by the Residential Tenancy Branch would be administered. The Order included a conditional stay of the Order of Possession. One condition of the Stay was that Mr. Brown pay "the outstanding rental arrears of the respondent, CAPREIT, in full and in the amount of \$9,517.70" by 4:00 p.m. on the date of the Order, October 24, 2018.

37. On February 28, 2018, employees of the Council visited eight properties listed for sale as Mr. Brown's listings. Only one had signage referring to Mr. Brown or the Brokerage but that one had a different logo than used by Mr. Brown in recent correspondence to the Council.
38. In the affidavit of Kasey Spracklin, she deposed that as a result of her review of the Council's records and her recent investigation:
 - (a) the licence for the Brokerage continues to state that the Brokerage is located at 51-76 Dallas Road, Victoria, BC;
 - (b) the Brokerage is restricted to that address;
 - (c) Mr. Brown is licensed as the managing broker of the Brokerage at that address;
 - (d) on February 28, 2019 there was no indication that either Mr. Brown or the Brokerage had a durable presence at 51-76 Dallas Road;
 - (e) the Council's records concerning the Brokerage Licence and the Individual Licence do not contain any communications from Mr. Brown regarding a change in the location of the Brokerage;
 - (f) Mr. Brown had failed to pay rent at 51-76 Dallas Road;
 - (g) only one of the listings personally seen has signage referring to Mr. Brown and the Brokerage;
 - (h) there are three open investigations into Complaints against Mr. Brown; and
 - (i) there is an active file related to Mr. Brown's suitability.
39. Ms. Spracklin deposed that based upon her experience as a Senior Compliance Officer, she believes the matters referred to above require a full and urgent investigation and that the necessity and urgency of a full investigation are compounded by the three open investigations into Complaints and the active file relating to Mr. Brown's suitability.
40. Further, Ms. Spracklin deposed that based upon her review of the Council's records, the results of her investigation from February 26-28, 2019 and her experience that she believes that there has been conduct by the Brokerage and Mr. Brown in respect of which a Discipline Committee of the Council could make an order under Section 43

(Discipline Orders) of the RESA against either the Brokerage or Mr. Brown or both and that based on the same factors she believed the length of time that would be required to complete a full investigation or hold a discipline hearing or both before a discipline committee could make such an order would be detrimental to the public interest.

Analysis

41. Before it has jurisdiction to make any order under Section 45(2), the Committee must find that the factors set out in Section 45(1) have been established. As noted at the outset, the Committee finds that they are. The three factors stated in Section 45(1) of the RESA are satisfied in this case. I will set out each of those in turn and the reasons for those findings.

Approach to Orders in Urgent Circumstances

42. In assessing evidence, the Committee does not make “final” findings of fact. Investigations are ongoing, and any “final” determinations must occur through a discipline hearing, or through admissions. This Committee engages in a “provisional” assessment of evidence, so that it may consider, among other things, if “there has been conduct in respect of which a discipline committee could make an order under section 43 [discipline orders] against a licensee,” under Section 45(1)(a) of RESA.
43. The BC Court of Appeal considered the proper approach for interim measures by self-regulating professions under the *Health Professions Act*, RSBC 1996, c 183 (the “HPA”), in *Scott v College of Massage Therapists of British Columbia*, 2016 BCCA 180. In that case, Section 35 of the HPA authorized an inquiry committee to take “extraordinary” action “necessary to protect the public during the investigation of a registrant or pending a hearing of the discipline committee...”.
44. The court approached Section 35 of the HPA as involving two separate questions: the strength of the case supporting the index allegations, and the case for immediate risk of harm to the public. Accordingly, a committee could act where satisfied “there is a prima facie case supporting the index allegations, and that having regard to such material as is put before it by the registrant, the public requires protection through an interim order” (at paragraph 81).
45. In substantially adopting the approach of the English Court of Appeal in *Perry v Nursing and Midwifery Council*, [2013] EWCA Civ 145, the court in *Scott* clarified that a “prima

facie case” is one which if believed, is complete and sufficient to justify a verdict in a complainant’s favour in the absence of an answer (at paragraph 80). Where a registrant has tendered evidence, a committee is not required to consider the registrant’s evidence as to whether the substantive allegation is or is not well founded; the Committee is only required to consider any evidence establishing that an allegation is manifestly unfounded or manifestly exaggerated (at paragraph 75). The committee is not to engage in a “mini-trial” of the index allegations (at paragraph 81).

Conduct in Respect of Which “A Discipline Committee Could Make an Order”

46. Section 43 of the RESA provides that after a discipline hearing, the discipline committee must act under Section 43 if it determines that the licensee has committed professional misconduct or conduct unbecoming a licensee. Sections 35(1), (2) and (3) of the RESA set out the conduct that will amount to professional misconduct or conduct unbecoming a licensee.
47. On the issue of whether there has been conduct in respect of which a discipline committee could make an order under Section 43, although the Council made submissions which were presented as contextual background, the focus of the application was narrower as the Committee has determined as set out in paragraph 61. However, it is instructive at this stage to set out the regulatory structure governing licensees.

The RESA

48. Section 6(1) of the RESA requires a brokerage to have a managing broker. Section 6(2) of the RESA provides that a managing broker licensed in relation to the brokerage acts for the brokerage in all purposes under the RESA and is responsible for:
 - (a) the exercise of the rights conferred on the brokerage by its licence,
 - (b) the performance of the duties imposed on the brokerage by its licence, and
 - (c) the control and conduct of the brokerage’s real estate business, including supervision of associate brokers and representatives who are licensed in relation to the brokerage.

49. Section 25 requires a brokerage to maintain proper books, accounts, and other records in accordance with the rules, and provides that the brokerage must keep these records in British Columbia.
50. Section 26 requires a brokerage to maintain at least one trust account in British Columbia.
51. Section 27 imposes requirements on both a licensee and a brokerage regarding the receipt and deposit of money.
52. Section 37(1) authorizes the Council to investigate whether a licensee has engaged in professional misconduct or conduct unbecoming a licensee.
53. Part 4, Division 2 provides for a comprehensive disciplinary structure for licensees.
54. Part 5 establishes a process for claiming compensation from the Special Compensation Fund in relation to a compensable loss described in section 60.

The Rules

55. The Rules impose significant obligations on licensees. Rule 2-2 requires a brokerage to have a managing broker. Rule 2-5 imposes conditions on a brokerage which has a residential office as its head office. Rule 2-17 imposes requirements related to the provision of a mailing address to the Council. Rule 2-19 imposes a requirement that licensees respond promptly to any inquiry from the Council. Rule 2-20 requires a brokerage to notify the Council if it is not able to pay its debts as they become due. Rule 3-1 imposes comprehensive professional obligations on a managing broker in relation to the conduct of a brokerage and its licensees. Rule 7-6 mandates that the council must be able to review and inspect records and audit if necessary.

Bylaws

56. Bylaw 4-8 of the Council bylaws provides that a brokerage must apply to amend its licence if it is changing its office address and certain specific requirements for an application to amend.
57. The Council submits that the evidence establishes that Mr. Brown and the Brokerage have committed professional misconduct contrary to Section 6 of the RESA and Rule 3-1 by the apparent abandonment by the Brokerage and its managing broker of the Brokerage's licensed address without notice to the Council that constitutes either a direct

breach by both licensees of many of the above requirements or makes it impossible for both licensees to satisfy their professional obligations and that such an action is a dereliction of their professional responsibilities.

58. The Council further submits that that dereliction is compounded when, as happened here, the managing broker of the brokerage suppresses information about his circumstances and the circumstances of the Brokerage which he was obligated to report despite being in periodic communication with the Council.
59. We accept that the evidence bears out the Council's assertions and there is a prima facie case before the Committee of conduct in respect of which a discipline committee could make an order.
60. The evidence shows that:
 - There are three Complaints against Mr. Brown and the Brokerage which raise serious concerns. The Third Complaint raises the concern of the abandonment of the licensed address.
 - Mr. Brown has stated to the Council he has health issues which appear to be serious. This raises the concern that he is not attending to his duties as managing broker.
 - There are concerns about his qualifications for licensure and a hearing is currently set for March 28-29, 2019. The Council's lawyer has written to Mr. Brown requesting medical information on his health issues and to confirm his availability for the March hearing. A fulsome reply was never received.
 - The Council sent three emails to Mr. Brown at the business address in January and February 2019 to confirm the Brokerage's address. However, it did not receive a direct response from Mr. Brown to those emails or any other response except the February 10, 2019 voicemail.
 - In Mr. Brown's OIPC Complaint an address is provided but was not supplied to the Council in connection with either the Brokerage licence or Mr. Brown's licence.
 - Mr. Brown has not lived at the licensed address since October 30, 2018 and appears to have unpaid arrears of rent which he did not tell the Council about.

Based on Rule 2-20, Mr. Brown, as the Brokerage's managing broker, had a duty to notify the Council if the Brokerage was not able to pay its debts as they became due.

- Mr. Brown's licence was re-extended under Section 12 of the RESA pending a Qualification Hearing.
- Mr. Brown's page on the REALTOR.ca website showed nine listings. Only one of the eight visited by the Council employees had any signage referring to Mr. Brown or the Brokerage and the for sale sign for that one home did not contain any contact information. As well, the logo for the Brokerage on that one sign was different than on his current emails to the Council.
- The evidence discloses that for many months Mr. Brown has not been spending time, paying attention to and discharging the duties required as managing broker.

61. The Committee finds that the following sections of the RESA, the Rules and Bylaws have not been complied with and there has been conduct in respect of which a discipline committee could make an order under Section 43 of the RESA.

- Section 25 of the RESA requires the books and records of the Brokerage must be kept in British Columbia. Based on the evidence, the Council does not know where the records are kept.
- Rule 2-17 requires the Council have a mailing address for a licensee. Based on the evidence, the address the Council has for Mr. Brown is not a valid address for him.
- Section 4-8(2)(a)(iii) of the Bylaws requires a brokerage to apply for a license amendment if it is changing its office address. No amendment has been applied for and it is clear on the evidence that the brokerage has changed its office address.
- As stated, Mr. Brown has not complied with Rule 2-20 by not notifying the Council of his unpaid rent for the Licensed Brokerage.

62. The clients that Mr. Brown and the Brokerage have are entitled to service on an ongoing basis. The public interest requires that service be accompanied by supervision and active management from a managing broker. None of that appears to be happening.

63. The public interest requires that clients be protected. Matters cannot be put on hold while the investigation of the concerns identified in Ms. Spracklin's affidavit is completed. It would be contrary to the best interests of the public to allow this situation to continue. It would undermine public confidence in the real estate industry and its regulation. It would bring the real estate industry into disrepute.
64. In all of the circumstances presented to the Committee, it must fall to the Council to move to protect the public and the clients of Mr. Brown and the Brokerage.

Urgent Circumstances

65. The circumstances before the Committee speak for themselves. The apparent abandonment by a brokerage and its managing broker of their licensed address without notification to the Council is, inherently, a situation of urgency which requires full and careful investigation. Such a development places the Council in the position where it has become impossible to discharge its statutory mandate to protect the public pending a full and careful investigation, and possibly a discipline hearing under Section 43. Effective regulation requires a reasonable degree of certainty and stability. Certainty and stability are absent from the circumstances before the Committee.
66. Urgency is compounded where the factual background to an application for an order under Section 45 includes circumstances which raise a concern about the context in which a licensee's actions have occurred. Here the factual background includes the managing broker's licence which has been re-extended under Section 12 of the RESA pending a Qualification Hearing and three open investigations into Complaints which could lead to discipline. The existence of such a background to the circumstances which are the focus of the application before the Committee further supports the conclusion that the pre-condition established by Section 45(1)(b) exists.
67. Ms. Spracklin, a Senior Compliance Officer, has affirmed in her affidavit that she believes the length of time that would be required to complete a full investigation or hold a discipline hearing or both before a Discipline Committee could make an order would be detrimental to the public interest.
68. Mr. Spracklin's belief is fully supported by the evidence before the Committee.

Public Interest

69. The Committee finds that it is in the public interest to make the Order sought.

- 70. The public is rightfully concerned to ensure effective regulation of the real estate industry and adherence to the requirements of the RESA and the Rules. That includes ensuring ongoing supervision of the business of each brokerage by at least one licensed managing broker.
- 71. When “conduct in respect of which a Discipline Committee could make an order under Section 43 against a licensee” is shown, when it would be detrimental to the public interest to wait until the completion of a hearing process before an order was made, and when it is in the public interest to make an order of suspension against the licensees, the Committee has a discretion to exercise under Section 45 of the RESA.
- 72. The facts noted in these reasons establish those factors. Mr. Brown and the Brokerage have not been meeting the standards required by the RESA and the Rules and appear unlikely to do so in the near future, all of which operates to the prejudice of their clients and to the public interest.

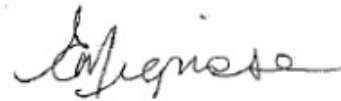
Conclusion

- 73. For the foregoing reasons and based upon the evidence presented and submissions made by counsel for the Council, the Committee made the Order sought, including those suspending the licences of Mr. Brown and the Brokerage effective immediately, as set out in the copy of the signed Order attached hereto.

Dated at Vancouver, British Columbia this 28 day of March 2019.

For the Discipline Hearing Committee:

By:



Elana Mignosa
Discipline Hearing Committee