# IN THE MATTER OF PART 3 OF THE LEGAL PROFESSION ACT, RSA 2000, c. L-8

#### **AND**

# IN THE MATTER OF A HEARING REGARDING THE CONDUCT OF HARDEEP SANGHA A MEMBER OF THE LAW SOCIETY OF ALBERTA

# **Hearing Committee**

Cal Johnson, KC – Chair Glen Buick – Lay Bencher Levonne Louie – Lay Bencher

# **Appearances**

Shanna Hunka – Counsel for the Law Society of Alberta (LSA) Aryan Sadat – Counsel for Hardeep Sangha

# **Hearing Dates**

January 5, January 22, and March 20, 2024

# **Hearing Location**

Virtual Hearing

# **HEARING COMMITTEE REPORT**

# Overview

- 1. The following citations were directed to hearing by a Conduct Committee Panel on December 13, 2022, and amended on August 21, 2023:
  - 1) It is alleged Hardeep S. Sangha acted in an inappropriate manner with his students and employees and that such conduct is deserving of sanction.
  - 2) It is alleged Hardeep S. Sangha was involved in the false information and forgery contained in a Revocation of Power of Attorney document and that such conduct is deserving of sanction.
  - 3) It is alleged Hardeep S. Sangha filed a Revocation of Power of Attorney document at the Land Titles Office that he knew was false and that such conduct is deserving of sanction.
  - 4) It is alleged Hardeep S. Sangha commissioned an Affidavit of Execution he knew to be false and that such conduct is deserving of sanction.
  - 5) It is alleged Hardeep S. Sangha failed to provide his clients, A.E. and M.E., with thorough, conscientious, and diligent service and that such conduct is deserving of sanction.

- 6) It is alleged Hardeep S. Sangha failed to provide his client, S.Co., with thorough, conscientious, and diligent service and that such conduct is deserving of sanction.
- 7) It is alleged Hardeep S. Sangha failed to provide his client, B.T., with thorough, conscientious, and diligent service and that such conduct is deserving of sanction.
- 8) It is alleged Hardeep S. Sangha provided false information to his client, B.T., regarding the status of her matter and that such conduct is deserving of sanction.
- 9) It is alleged Hardeep S. Sangha breached Rule 119.21 of the Rules of the Law Society of Alberta when he withdrew funds from trust prior to sending a billing to the client and that such conduct is deserving of sanction.
- 2. Mr. Sangha was admitted as a member of the LSA in December 2015. Mr. Sangha has practiced both as a sole practitioner, and with articling students or associates, in Calgary.
- 3. The citations relate to:
  - a) inappropriate conduct by Mr. Sangha with respect to several of his articling students and employees;
  - improper conduct in relation to the signing, and filing at the Land Titles Office, of a Revocation of Power of Attorney and commissioning a false affidavit of Execution in relation to that document; and
  - c) failing to provide several clients with thorough, conscientious and diligent service, including, without limitation, by:
    - (a) paying his fees from monies held in trust prior to delivering a statement of account:
    - (b) failing to register a mortgage for an extended time and after he had already disbursed the mortgage proceeds; and
    - (c) advising a client that documents had been sent to Court and that a hearing would be held on a specified date, both of which were wrong and thereafter providing misleading communications about the matter.
- 4. Mr. Sangha executed a Statement of Admitted Facts, Exhibits and Admissions of Guilt (SOAF) on November 9, 2023. He admitted guilt in respect of citations 1, 4, and 5-9 inclusive and admitted that these citations described conduct deserving of sanction. For citation 3, Mr. Sangha made a qualified admission of guilt limited to filing a false Affidavit of Execution.
- 5. A Hearing into the conduct of Mr. Sangha in relation to the Citations was originally scheduled for late November 2023. However, on the eve of the scheduled Hearing, Mr. Sangha dismissed his counsel who had assisted in the negotiation of the SOAF and made an application to the Hearing Committee (Committee) to postpone the Hearing so

- that he could retain new counsel. That application was granted and the two scheduled dates in January 2024 were agreed upon.
- 6. On January 5 and 22, and March 20, 2024 the Committee convened a Hearing into the Mr. Sangha's conduct, based on the above citations.
- 7. After reviewing all of the evidence and exhibits and hearing the testimony and arguments of LSA counsel and counsel for Mr. Sangha, for the reasons set out below, the Committee finds Mr. Sangha guilty of conduct deserving sanction on Citations 1, 3, 4, 5, 6, 7, 8, and 9, and not guilty on Citation 2, pursuant to section 71 of the *Legal Profession Act (Act)*.
- 8. The Committee will reconvene later to consider the issues of sanction and the payment of the costs of the proceeding.

# **Preliminary Matters**

- 9. There were no objections to the constitution of the Committee or its jurisdiction, and a private Hearing was not requested. Accordingly, the Hearing into Mr. Sangha's conduct proceeded as a public hearing.
- 10. The Committee addressed, as a preliminary issue, some concerns raised by Mr. Sadat, as counsel for Mr. Sangha. At the beginning of the Hearing, Mr. Sadat asked permission to reserve his opening statement for the conclusion of the Hearing. Although it was unusual, that request was granted. At the conclusion of the Hearing, Mr. Sadat began his argument with what he described as his opening statement. He argued that, since LSA counsel, Ms. Hunka had called witnesses in respect of uncontested admissions by Mr. Sangha, it resulted in a potentially half-day hearing lasting three full days. He noted that he had been retained very late in the matter and after the SOAF had already been entered into. He also indicated that after reviewing the SOAF "we could have...or could have perhaps resiled from that". Mr. Sadat indicated when he came on as counsel it was his understanding that they were just dealing with everything that was admitted in the SOAF. Although Mr. Sadat made this submission at the end of the Hearing, the issue is addressed by the Committee as a preliminary matter as if it had in fact been made as part of an opening statement at the commencement of the Hearing.
- 11. LSA counsel called a number of witnesses, including three former articling students and a former employee, in relation to Citation 1 and in part with respect to Citations 2 and 3. Ms. Hunka explained in her opening statement that, despite the full admission in Citation 1, the LSA was aware of some conduct which was not admitted. Accordingly, she argued it was important the Committee hear the full particulars of the conduct to "add some additional information and evidence about the improper manner in which they were treated". Ms. Hunka's argument was that the full particulars of the conduct that were not entirely admitted necessitated calling the four witnesses to speak to that Citation.
- 12. The Committee has some sympathy for this argument by Mr. Sadat. Exhibits 5.3, 7, 10 and 18, and the SOAF provided ample evidence for the purposes of Citation 1. The LSA and Mr. Sangha negotiated the SOAF and the text of the admissions to Citation 1. Unlike Citation 3, where Mr. Sangha only admitted guilt to a part of the Citation, Mr. Sangha

admitted guilt to Citation 1 in the exact words of the Citation. In the Committee's view, the LSA was providing particulars of conduct that could have been included more extensively in the SOAF as non-admitted conduct, and proceed as it did in the case of the non-admitted conduct in Citation 3. The purpose, in part, of an Admitted Statement of Facts is to expedite the Hearing by dealing with the Citations on a common ground. The additional evidence put forward through these four LSA witnesses put Mr. Sangha in the position of calling his own "character"-type witnesses to rebut some of the "colour" provided by the witnesses called by Ms. Hunka.

- 13. In raising this issue at the conclusion of the Hearing, Mr. Sadat was asked by the Committee what he was requesting of the Committee, and he responded that the Committee rely principally on the SOAF. The Committee has determined, only with respect to Citation 1 and for the purposes of this Merits decision, to rely principally on the admissions in the SOAF and the exhibits entered at the Hearing and has determined to give less weight to the evidence provided at the hearing by those witnesses. This is not in any manner a criticism of how Ms. Hunka elected to proceed with her case. In paragraph 65 of the SOAF, Mr. Sangha clearly acknowledged that all parties retained the right to adduce additional evidence and to make submissions on the effect of and weight to be given to the agreed facts. Ms. Hunka was entitled to do just that.
- 14. In making the above determination on weight, the Committee also notes that, through some of the testimony provided by or on behalf of Mr. Sangha, he appeared to contradict or resile from some of the SOAF. At times, Mr. Sadat intimated that Mr. Sangha should not have agreed with some of the admissions in the SOAF, but repeatedly said he was not resiling from them. When Mr. Sangha changed counsel, he could also have determined not to proceed based on the SOAF and either go direct to the Hearing or attempt to negotiate a revised SOAF that his new counsel was comfortable with. They did not do so. Accordingly, the determination of the Committee to rely principally on the SOAF and the exhibits entered at the Hearing is a double-edged sword and the Committee will be similarly giving less weight to the evidence that Mr. Sangha adduced at the Hearing from witnesses that might be described as character witnesses and to an audio recording provided in respect of one of the LSA witnesses, which was provided only after that witness had been dismissed and not allowed to address during his cross examination. The Committee gives much less weight to any evidence or argument where it appears that Mr. Sangha was resiling from the SOAF.

# Agreed Statement of Facts/Background

# Citation 1

- 15. The SOAF and the exhibits entered at the Hearing describe a series of incidents between Mr. Sangha and individual articling students which involving yelling, swearing, making highly inappropriate and personalized comments and demeaning behavior. The SOAF also related similar inappropriate, threatening, intimidating, abusive and highly unprofessional comments to a legal assistant. In both cases, Mr. Sangha was involved in a power imbalance which he exploited in attempting to manipulate or intimidate individual members of his firm.
- 16. Exhibit 5.3 contained extensive text exchanges between Mr. Sangha and some of the staff in question, and particularly C.R. While the admissions in the SOAF were very

concerning, the details in the text messages provide ample evidence of the particularly erratic behaviour exhibited by Mr. Sangha which shows him vacillating wildly between praise, condemnation and threatening behaviour. Describing these exchanges as inappropriate would be a significant understatement. They are not only unprofessional but shocking in the violent nature of some of the actions Mr. Sangha requested as demonstrations of loyalty.

## Citation 2

- 17. Mr. Sangha did not make any admission of guilt in respect of Citation 2 in the SOAF, which deals principally with the Revocation of Power of Attorney entered as Exhibit 5.5 and which was registered at the Land Titles office (Registered Revocation). In the SOAF Mr. Sangha does not refer to, or make any admissions in respect of, the Revocation of Power of Attorney entered as Exhibit 17 (Photo Revocation). However, in his cross-examination in relation to the Photo Revocation, Mr. Sangha indicated (Transcripts, pages 512-514):
  - a) he witnessed both signatures;
  - b) the signatures were in fact those of M.E. and R.E.; and
  - c) he believes he would have sworn an Affidavit of Execution in relation to that document swearing that he saw M.E. and R.E. sign the document.
- 18. The Registered Revocation shows C.R. as the witness and purports to have been signed by C.R. on January 9, 2020, which preceded the commencement of her employment with Mr. Sangha. For that Registered Revocation, Mr. Sangha only admits in the SOAF (paragraphs 29, 30 and 31) that:
  - a) he commissioned the Affidavit of Execution on the Registered Revocation;
  - b) he knew the C.R. could not have witnessed the actual signing;
  - c) M.E. and R.E. signed the Registered Revocation and that he had seen those signings at his office in respect of M.E. and at her home in respect of R.E.; and
  - d) he submitted that false Affidavit of Execution for filing at Land Titles, together with a mortgage, on or about February 1, 2021.
- 19. C.R. gave detailed evidence as to the circumstances of the execution of both the Photo Revocation and the Registered Revocation. In both cases she said Mr. Sangha forged the signature of R.E. and she forged the signature of M.E., and that both occurred in quick succession on February 1, 2021 in Mr. Sangha's office with both present. She testified that Mr. Sangha required the Registered Revocation to be signed after the Photo Revocation since he indicated he could not be the witness (as he was shown on the Photo Revocation) and that she would have to do so as witness.
- 20. R.E. testified that the signature listed as hers on the Registered Revocation was not hers, but that the signature on the Photo Revocation was in fact hers. No expert handwriting evidence was given at the Hearing.

## Citation 3

21. In the SOAF (paragraph 33), Mr. Sangha admits only that he filed a false Affidavit of Execution in relation to the Registered Revocation. This is an apparent denial that he filed the Registered Revocation, knowing it to be false.

#### Citation 4

22. The Citation is a refinement of Citation 3 and Mr. Sangha clearly acknowledges in the SOAF that he commissioned the Affidavit of Execution on the Registered Revocation knowing it to have been false and that he sent that document to Land Tiles for filing.

## Citations 5 and 6

- 23. This Citation involved M.E. and his son, A.E., who retained Mr. Sangha to obtain a mortgage from S. Co. Mr. Sangha acted for both mortgager and mortgagee. Notwithstanding that he had not registered that mortgage at Land Titles, he requisitioned the mortgage proceeds on the same day the mortgage was signed (January 16, 2020) and disbursed them to the mortgagors on January 17, 2020. On the same date, he paid his fees from trust monies in respect of that mortgage transaction. It took over a year for that mortgage to be registered on February 10, 2021, as evidenced in the Certificate of Title attached as Exhibit 5.7 to the SOAF. Mr. Sangha's statement of account in respect of the mortgage was attached as Exhibit 5.6 and was dated January 17, 2020.
- 24. Mr. Sangha acknowledged in the SOAF that he failed to comply with instructions from S.Co. as the mortgage lender. In the case of both Citations 5 and 6 he admitted to guilt in the precise wording of the Citations.

# Citations 7, 8 and 9

- 25. Mr. Sangha was retained by client B.T. in August of 2021 to apply to Court to obtain a freezing order in respect of assets of a third party. For that he obtained a \$10,000.00 retainer. The SOAF then details a series of admissions where Mr. Sangha repeatedly misleads B.T. about the scheduling of a hearing, when documents were sent to the Court, his success in a hearing that had not taken place, about receiving the order from the hearing and then serving it.
- 26. The emails attached as Exhibits 5.8 and 5.9 detail the various misleading communications from Mr. Sangha and the extended period over which they occurred. B.T. was additionally misled by the statement of account Mr. Sangha rendered on November 1, 2021, in referencing events that did not happen and the filing and incurrence of filing fees in respect of documents that were not filed.
- 27. The admissions and evidence in respect of Citation 9 detail clear breaches of the Trust Safety Accounting Rules of the LSA, and the Code of Conduct in that he withdrew monies from trust and paid himself prior to rendering an account, and indeed it appears prior to any substantive work having been done as he had claimed to B.T.
- 28. Mr. Sangha admitted guilt to each of Citations 7, 8 and 9 in the precise language of the Citations.

## Submissions of the LSA

# Citations 4, 5, 6, 7, 8 and 9

29. LSA counsel effectively grouped these six Citations together as being ones on which there were straight forward admissions of guilt, and no new evidence was introduced. Ms. Hunka discussed some of the specific evidence from the Exhibits to the SOAF and referenced breaches of the LSA Code of Conduct (Code) involving Sections 2.1-1 (duty of integrity), 3.2-1 (duty of service), 3.2-3 (obligations of honesty and candour), and Rule 119.21(4) of the Rules of the LSA (withdrawing monies from trust prior to rendering an account).

## Citation 1.

30. As noted in paragraph 11 above, Ms. Hunka called a number of witnesses to speak to admitted facts in the SOAF in relation to Citation 1. In her submissions on this Citation, Ms. Hunka went into extensive detail concerning conduct that she argues went beyond that set out in the SOAF. This detailed the traumatic effects on the various articling students and C.R. A significant portion of this was covered in various exhibits entered at the Hearing. Ms. Hunka referred to section 6.2-2 of the Code in relation to the duties of Mr. Sangha as a Principal to the various witnesses called by the LSA and who had articled in whole or in part to Mr. Sangha.

## Citation 2.

- 31. Ms. Hunka argued that C.R.'s version of events surrounding the execution of the Registered Revocation was the most compelling and credible in the circumstances. Those circumstances included:
  - a) the fact that Mr. Sangha had failed to register a mortgage for over a year and was receiving heated and persistent inquiries from the mortgagee S.Co., since the mortgage proceeds had already been advanced at a time when the mortgagee had no mortgage, reporting letter or evidence of insurance;
  - b) C.R. was admitting to participating in a forgery and the incorrect and misleading Affidavit of Execution, which was a substantial admission in the circumstances; and
  - c) if Mr. Sangha was saying the Photo Revocation signatures were real, while the Registered Revocation signatures were not, then why had he submitted the Registered Revocation and not the Photo Revocation?
- 32. Ms. Hunka argued that the clear and unshaken evidence of C.R. contrasted with that of R.E. whose evidence was full of statements involving not knowing or remembering and that she did not have a strong recollection of the matters, which she argued contrasted with the very precise recollections of C.R.
- 33. Ms. Hunka tendered comparisons of the various signatures of R.E. and M.E. as part of her argument noting that R.E. clearly said the signature on the Registered Revocation was not hers, as was confirmed by C.R. Ms. Hunka further suggested that the notable

- similarity between the signatures of M.E. on the two Revocations (both of which C.R. said she had forged) gave additional credibility to C.R.'s version of events.
- 34. Ms. Hunka further argued that the evidence of C.R. was stronger in that she had given a detailed account which seemed to accord with how the Registered Revocation had come to be both signed and submitted for registration at Land Titles. That contrasted with Mr. Sangha indicating that he did not know how the false signatures came to be affixed, nor did he seem to know at the Hearing how the Registered Revocation came to be submitted to Land Titles even though he admitted to doing so in the SOAF.
- 35. Ms. Hunka finally argued that the Citation 2 contained two parts and that even if one was to discount the evidence suggesting that Mr. Sangha signed the Registered Revocation on behalf of R.E., he still meets the wording of the Citation in respect of being involved in the false information aspect of the document.

# Citation 3.

36. Ms. Hunka argued that while Mr. Sangha testified that he did not know how the signatures of R.E. and M.E. came to be affixed to the Registered Revocation, he did know that C.R. could not have been able to witness them on that date, while C.R. gave a "compelling and fulsome and unshaken" account as to how that happened. Effectively, the argument in respect of Citation 3 tracked the argument on Citation 2 in respect of Mr. Sangha proceeding to file a document at Land Titles that he knew to be false in several aspects.

# Submissions of Counsel for Mr. Sangha

## Citation 1

37. Counsel for Mr. Sangha, Mr. Sadat, spent considerable time in argument dealing with the same matters on Citation 1 that Ms. Hunka did, namely the additional "colour" evidence that was provided by the four LSA witnesses. He argued that, through the guidance of his previous counsel, Mr. Sangha had admitted "to a more extreme" form of SOAF to take responsibility, decrease costs and reduce hearing time and witnesses. His argument focused on impugning the credibility of the four LSA witnesses and dealing with alleged discrepancies in their testimony and the motivations for their statements. At one point, and in relation to the testimony of both B.K. and D.H., he made a submission that the witness testimony showed that Mr. Sangha admitted things which would not have been proven, but then confusingly said in both cases that they were not resiling from what was in the SOAF. In the end he suggested that the Committee should take that into consideration as a matter of the weight to be given to this additional evidence.

#### Citation 2

38. Mr. Sangha began his submission noting that R.E. had clearly identified, in respect of multiple documents, those signatures which she said were her own and those which were not. She also had confirmed at least that she had met with Mr. Sangha to sign documents, although did not specifically reference either of the Revocations. Mr. Sadat also referenced the Photo Revocation and noted that R.E. said she had signed that, and Mr. Sangha had acknowledged that he witnessed that signature.

39. Mr. Sadat's other argument was to the effect that there was no expert handwriting evidence adduced and that accordingly the evidence of R.E., who was the LSA witness, should be taken at face value.

## Citation 3.

40. Mr. Sadat argued that Citations 3 and 4 should have been consolidated in Citation 4, which Mr. Sangha admitted to in the SOAF. He suggests that Mr. Sangha failed to look at the document that the false Affidavit of Execution was attached to and failed to supervise "that".

# **Analysis and Decision**

- 41. The Committee concluded that the SOAF was in an acceptable form. In the SOAF, Mr. Sangha confirmed that:
  - a) he made his admissions voluntarily and understood their nature and consequences;
  - b) he unequivocally admitted guilt to the Citations describing the conduct deserving of sanction [being Citations 1 and 4 to 9 inclusive];
  - c) he had the opportunity to consult legal counsel and provided the SOAF on a free and voluntary basis;
  - d) he acknowledged that all parties retained the right to adduce additional evidence and to make submissions on the effect of and weight to be given to these agreed facts; and
  - e) he understood that if there was a joint submission on sanction [which there was not], the Committee would show deference to it but is not bound by it.
- 42. The Committee was satisfied that Citations 1, 4, 5, 6, 7, 8 and 9 had been proven and that Mr. Sangha was guilty of conduct deserving of sanction on all these Citations.

# Citation 2.

43. At the outset, the Committee notes that the Citation appears to be descriptive of only one of the two Revocations of Power of Attorney entered in evidence at the Hearing. Ms. Hunka referenced two different versions of the Revocation of Power of Attorney, only one of which was registered at Land Titles, being the Registered Revocation. It is that Registered Revocation that is the subject of Citation 2. The crucial question is whether Mr. Sangha participated in what appeared to be some evidence of forgery in relation to the signatures on the Registered Revocation, although the testimony and evidence at the Hearing suggested forgery in respect of another version, being the Photo Revocation, which showed Mr. Sangha as the witness to the signatures. However, there was no original of that complete document in evidence. Rather, the only version introduced was from a picture taken (of the first page only) by C.R. on her phone and substantiated to have been taken February 1, 2021. That was the same day C.R. testified the signatures thereon of M.E. and R.E., and on the Registered Revocation, were forged by herself (as M.E.) and by Mr. Sangha (as R.E.).

- 44. Mr. Sadat did not explain how the Committee should rely on R.E. to identify her signature as real in the Photo Revocation, but not her signature in the Registered Revocation where Mr. Sangha clearly said in the SOAF that it was her signature. In his evidence in chief, Mr. Sangha indicated he had no idea as to how the Registered Revocation had been sent to Land Titles. Mr. Sadat intimated that C.R. was the last one to handle that document, without directly suggesting that it was she who had submitted it. This is directly contradicted by what was admitted in paragraph 29 of the SOAF.
- 45. In answer to a question from his counsel during his evidence in chief (Transcripts, page 512), Mr. Sangha was asked: "....and we also know from a screen shot of this [Photo Revocation] that it was present in your office on February 1, 2021, where a picture was taken of it. Why was this document not the one remitted [to Land Titles]?" Mr. Sangha then indicates that he thought it was the one sent for registration at Land Titles. He also admits on cross examination that he has no explanation for why the Registered Revocation was the one submitted, but clearly in paragraph 29 of the SOAF, he says that he was the one who submitted that document to Land Titles for registration.
- 46. C.R. also testified she signed for M.E. on both of the Revocations. Comparing those two signatures to an acknowledged real signature of M.E., it appears to the untrained eye that the two signatures that C.R. said she forged were very similar, but different from the acknowledged real signature of M.E. on Power of Attorney in Exhibit 5.4.
- 47. The Committee examined the various signatures presented. In her testimony, R.E. stated that her signature on the Photo Revocation and on the Power of Attorney in Exhibit 5.4 were her actual signature. Acknowledging that none of the Committee members has any expertise in handwriting analysis, it appeared that the signature of R.E. on the Photo Revocation (which R.E. said was not hers) is similar to her signature on the Power of Attorney in Exhibit 5.4 and on the Transfer of Land in Exhibit 14 (which she acknowledged were hers) but all three appear to be markedly different from her signature on the Registered Revocation (which again she says was not hers). It is this latter signature on the Registered Revocation that C.R. testified Mr. Sangha signed. To confuse matters further, R.E. testified that the signature on the General Power of Attorney in Exhibit 16 was her real signature, but which again appears not to match the other signatures she testified to be real.
- 48. In reviewing the evidence, the Committee has some concerns with the evidence of R.E., only in the sense that she was presented with multiple images to view over a virtual call in a very short space of time and asked to specifically recall the circumstances of each and which ones were hers and which ones were not. She seemed to struggle with differentiating between them and Committee did as well. The Committee has some grave misgivings as to the credibility of the testimony of Mr. Sangha and did find C.R. to be a credible witness. However, in the face of the contradictory evidence in terms of the signatures of R.E. and the absence of any expert handwriting evidence for the Committee to rely upon, the Committee finds that Citation 2 has not been proven in respect of the forgery aspect.
- 49. However, the Committee did agree with the submissions of LSA counsel that Mr. Sangha participated in the false information contained in the Registered Revocation based upon the conclusions and analysis above.

50. The Committee finds that Citation 2 has not been proven on a balance of probabilities in relation to the allegation of forgery by Mr. Sangha but has been so proven in respect of the allegation that Mr. Sangh participated in the false information contained in the Registered Revocation and that such conduct is deserving of sanction.

#### Citation 3

51. Mr. Sadat argued that if Citation 2 was not proved in respect of the forgery, then Citation 3 must also fail. With respect, the Committee does not follow that argument, nor see how Mr. Sangha could say either that he did not file the Registered Revocation or know that it was false. He makes this distinction on the basis that, in submitting the Registered Revocation for registration, with an acknowledged false Affidavit of Execution, somehow this did not involve filing the Registered Revocation that he knew was false. The Committee determined that to be a distinction without a difference. Mr. Sangha's credibility on these matters is highly suspect and internally inconsistent. Consequently, the Committee finds Mr. Sangha guilty of conduct deserving of sanction on Citation 3.

# **Concluding Matters**

- 52. The Committee finds Mr. Sangha guilty of conduct deserving of sanction of Citations 1, 3, 4, 5, 6, 7, 8 and 9 and not guilty of Citation 2.
- 53. Accordingly, a hearing will be set to deal with remaining matters, including sanction, costs, notices, and any other outstanding issues.
- 54. The exhibits, other hearing materials, and this report will be available for public inspection, including the provision of copies of exhibits for a reasonable copy fee, except that identifying information in relation to persons other than Mr. Sangha will be redacted and further redactions will be made to preserve client confidentiality and solicitor-client privilege (Rule 98(3)).

Dated June 6, 2024.	
Cal Johnson, KC	
Glen Buick	
 Levonne Louie	