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FILED

JUN 09 2022

DEPT. OF REAL ESTATE  
By *Emma Muz*

9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

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12 In the Matter of the Accusation of ) No. H-42330 LA  
13 )  
14 DONNIE RAY MULDROW, ) ACCUSATION  
15 Respondent. )  
16 \_\_\_\_\_ )

17 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
18 State of California, for cause of Accusation against DONNIE RAY MULDROW  
19 ("Respondent"), is informed and alleges as follows:

20 1.

21 The Complainant, Veronica Kilpatrick, acting in her official capacity as a  
22 Supervising Special Investigator of the State of California, makes this Accusation against  
23 DONNIE RAY MULDROW.

24 2.

25 All references to the "Code" are to the California Business and Professions Code  
26 and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

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Accusation of Donnie Ray Muldrow

3.

Respondent DONNIE RAY MULDROW presently has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a real estate broker. Respondent also has an individual mortgage loan originator license endorsement.

## SALE OF LOS ANGELES PROPERTY

4.

On or about July 9, 2019, seller K. Holt sold real property at 10308 Wall St, Los Angeles, California 90003 (“Los Angeles property”) to buyer Bird’s Estate, LLC. Respondent represented both seller and buyer in the Los Angeles property transaction. Respondent used the unlicensed fictitious business name “East West Estates” in the Los Angeles property transaction.

## PURCHASE OF LOS ANGELES PROPERTY

5.

On or about March 17, 2020, buyers K. Holt and S. Williams submitted an offer to purchase the Los Angeles property through a Residential Purchase Agreement to seller Bird's Estate, LLC, represented by Respondent. On or about April 2, 2020, Respondent signed the Residential Purchase Agreement and used the unlicensed fictitious business name "East West Estates".

## LINKEDIN WEBSITE

6.

From June 10, 2021, through the present, Respondent has operated a website at <https://www.linkedin.com/in/donnie-muldrow857a67149>, which describes Respondent as “CEO for East West Estates/Lending Key, Inc.”

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## Accusation of Donnie Ray Muldrow

## REQUEST FOR RECORDS OF LOS ANGELES HOUSE TRANSACTION

7.

On or about March 5, 2021, a Department of Real Estate (“Department”) investigator mailed a letter to Respondent requesting the complete transaction files for the Los Angeles house transactions in 2019 and 2020.

8.

On or about August 12, 2021, a Department investigator mailed a letter to Respondent requesting the complete transaction files for the Los Angeles house transactions in 2019 and 2020.

9.

On or about October 14, 2021, the Department served Respondent with a subpoena for the production of the complete transaction files for the Los Angeles house transactions in 2019 and 2020.

10.

Respondent failed to provide the Department with the complete transaction files for the Los Angeles house transactions in 2019 and 2020.

**FIRST CAUSE OF ACTION**

## FAILURE TO RETAIN RECORDS

11.

The conduct, acts, and omissions of Respondent, as described in Paragraphs 7 through 10 above, in failing to retain and make available for examination, copying, and inspection the records related to the Los Angeles house transactions in 2019 and 2020, are in violation of Code section 10148 and constitute cause under Code sections 10177(d) and/or 10177(g) for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent.

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**SECOND CAUSE OF ACTION**

## USE OF UNLICENSED FICTITIOUS BUSINESS NAME

12.

The conduct, acts, or omissions of Respondent, as described in Paragraphs 4 through 6 above, are in violation of Code section 10159.5 and Regulations section 2731 and constitute cause under Code sections 10177(d) and/or 10177(g) for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent.

13.

14 WHEREFORE, Complainant prays that a hearing be conducted on the  
15 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
16 disciplinary action against all the licenses, license endorsements, and license rights of  
17 Respondent DONNIE RAY MULDROW under the Real Estate Law, for the cost of  
18 investigation and enforcement as permitted by law, and for such other and further relief as may  
19 be proper under other applicable provisions of law.

21 Dated at San Diego, California

22 | this  9  day of  June , 2022

Veronica Kilpatrick

Veronica Kilpatrick  
Supervising Special Investigator

1 cc: DONNIE RAY MULDROW  
2 Lending Key Inc  
3 Veronica Kilpatrick  
4 Sacto.  
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