

Julie L. To, Counsel (SBN 219482)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013
julie.to@dre.ca.gov
(213) 559-5990 (Office)
(213) 443-6294 (Direct)
Department of Real Estate Counsel

FILED

JUN 12 2025

DEPT. OF REAL ESTATE

By- 

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * * * *

In the Matter of the Accusation of)	No. H-42905 LA
)	
EARLINE WILSON,)	FIRST AMENDED
)	ACCUSATION
Respondents.)	

The Accusation filed on November 18, 2024 is amended in its entirety as follows:

The Complainant, a Supervising Special Investigator of the State of California,
for cause of Accusation against Respondent EARLINE WILSON, f.k.a. Earline Cooley f.k.a.
Earline McKenzie, is informed and alleges as follows:

1.

The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of
California, makes this Accusation in his official capacity.

///

2.

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

DRE LICENSE HISTORY

RESPONDENT REAL ESTATE BROKER EARLINE WILSON

3.

According to DRE records to date and publicly accessible online at https://www2.dre.ca.gov/PublicASP/pplinfo.asp?License_id=01279015, EARLINE WILSON (Respondent) is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a real estate broker (REB), Department of Real Estate ("Department" or "DRE") license ID 01279015.

4.

According to DRE records to date and publicly accessible online at the aforementioned website, Respondent was first licensed by the Department as a real estate salesperson (RES) on or about April 25, 2000, and as a REB on July 31, 2006.

5.

According to DRE records to date and publicly accessible online at the aforementioned website, Respondent's mailing address of record is: P.O. Box 235, Carthage, TX 75633-6261 (Texas address), and Respondent has no current DBAs or branch offices. Respondent's main office address of record is 41029 Knoll Dr., Palmdale, CA 93551 (Palmdale address).

///

///

///

///

1 6.

2 According to DRE records to date and publicly accessible online at the
3 aforementioned website, Respondent's prior license affiliation history is as follows:

4 A. Respondent was an officer of Coastal Home Loans Inc, DRE license ID
5 01525652 until her officer license expired as of March 22, 2011, and

6 B. Respondent was an officer of First Option Lending International, Inc. until her
7 affiliation was cancelled as of June 1, 2014.

8 7.

9 According to DRE records to date and publicly accessible online at the
10 aforementioned website, Respondent's license will expire on April 4, 2027. Upon license
11 expiration and pursuant to Code Section 10201, Respondent retains renewal rights, and pursuant
12 to Code Section 10103, the DRE retains jurisdiction.

13 8.

14 Respondent also holds two (2) mortgage loan originator (MLO) license
15 endorsements, NMLS ID 887283 (individual) and NMLS ID 1197818 (company).

16 9.

17 At all times mentioned herein, Respondent engaged in the performance of
18 activities requiring a real estate license pursuant to Code Section 10130.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

Unlicensed Kenneth Wayne Brooks (Brooks)

10.

According to DRE records and publicly accessible online records, Kenneth Wayne Brooks (Brooks) is not now, and has never been, licensed in any capacity under the Real Estate Law.

11.

According to California State Bar (CalBar) records to date and publicly accessible online at <https://apps.calbar.ca.gov/attorney/Licensee/Detail/74188>, Brooks was formerly licensed by the State Bar, but has been inactive since January 16, 2018. According to Brooks' CalBar public license page, his last known contact information is as follows: 8690 Aero Dr., Ste. 115, San Diego, CA 92123-1757, 858-344-0664 (phone), 858-279-5588 (fax), and kennethwbrookskwb@gmail.com.

12.

According to CalBar records to date and publicly accessible online, Brooks DBA Williams, Hollins and Brooks, LLP and Williams and Brooks, LLP of Culver City was issued a Cease and Desist Notice on April 7, 2022.

13.

According to California Secretary of State (SOS) records to date and publicly accessible online at <https://bizfileonline.sos.ca.gov/search/business>, Brooks as Incorporator filed Articles of Incorporation for Williams-Hollins & Brooks as a General Stock Corporation on November 17, 2020, Entity Number C4664764; the street and mailing address for the corporation is listed as 1240 West Rosecrans Avenue, El Segundo, California 90266 (El Segundo address). According to the aforementioned SOS website, Williams-Hollins & Brooks is a suspended entity not in good standing with the Franchise Tax Board and became an inactive entity as of April 2, 2024.

14.

Unlicensed KB Life Home Loans (KBLHL)

According to DRE records and publicly accessible online records, KB Life Home Loans (KBLHL) is not now, and has never been, licensed in any capacity under the Real Estate Law.

15.

FACTS DISCOVERED BY THE DEPARTMENT

Respondent's Payment of Commission to Unlicensed Brooks

(January 14, 2022)

According to Respondent's letter to the DRE dated May 10, 2023 (Respondent's 051023 letter), in response to a DRE inquiry with the qualifier "If Kenneth Brooks is not licensed," Respondent stated that "Mr. Brooks "referrers [sic] clients that are in need of real estate financing," has done so for approximately three to five years, and that Respondent is paid per referral by check. According to Respondent, at the end of the year, Earline Wilson Brokerage issues a 1099 to Brooks' company for referral services.

16.

Included with Respondent's 051023 letter was a Southwest Escrow Corporation Final Borrower Statement for Borrower K. Armstrong for Property located at 1613 West Piru St., Compton, CA 90222 (subject property), printed January 24, 2022. Said Borrower Statement showed a closing date of January 14, 2022 and a disbursement date of January 19, 2022. Included in the statement were two (2) line items in the "Lender Charges" section for "Processing Fee: Earline Cooley" in the amount of \$1,295.00 and "Origination Fee: Earline Cooley" in the amount of \$12,210.00. According to the statement, Respondent was to be paid a total of \$13,505.00.

///

17.

Also included with Respondent's 051023 letter was a document titled "Finder's Fee Agreement (California Business and Professions Code §§ 10130 and 10139)" dated and signed January 14, 2022 by Respondent (as "Broker") and Brooks (as "Finder") (Finder's Agreement). The Finder's Agreement includes the statement, "This form is used by a broker when they employ an unlicensed individual to locate, solicit and refer or identify persons who need the services of the broker, to document the terms of the employment.") and provides that, "In consideration for services to be rendered by Kenneth Brooks, as the Finder, Broker contracts with Finder to refer to Broker a prospective client in need of services as a Borrower."

18.

The Finder's Agreement explicitly states that "Finder agrees not to participate in or conduct any negotiations with the prospective client or solicit loans on behalf of a prospective client," and as compensation, Broker (Respondent) agrees to pay, for each referral by Finder, "10% of Broker commissions plus any additional fee client agreed to with Mr. Brooks," payable within three to five days after the close of escrow.

19.

Respondent's 051023 letter also included a copy of Check No. 1060 dated January 21, 2022 signed by Respondent and payable to Brooks from the Union Bank account of Coastal Home Loans in the amount of \$6,088.80 with "Armstrong" written in the memo line. A copy of Check No. 1094 dated February 10, 2022 signed by Respondent and payable to Brooks from the same Union Bank account was also included with Respondent's 051023 letter; Check No. 1094 was for the amount \$10,693.55 with "Winfrey Comm." written in the respective memo line.

///

///

20.

Commission Payments

Mortgage Broker Fee of \$13,505 Paid by Southwest to Respondent

(January 20, 2022)

According to the Borrower Statement for the subject property, escrow closed on January 14, 2022. According to a January 20, 2022 Wire Verification, a wire transfer in the amount of \$13,505.00 was made from Southwest Escrow Trust Account #####3931 to Respondent as a "Mortgage Broker Fee."

21.

Commission of \$6,088.80 Paid by Respondent to Brooks

(January 21, 2022)

According to Respondent, she paid Brooks "per referral by check." For the subject property transaction, on January 21, 2022, Respondent signed Check No. 1060, payable to Brooks in the amount of \$6,088.80 with "Armstrong" written in the memo line.

APPLICABLE SECTIONS OF THE REAL ESTATE LAW

22.

License Required - Code Sections 10130 and 10131

Pursuant to Code Section 10130 *License Required*:

"It is unlawful for any person to engage in the business of, act in the capacity of, advertise as, or assume to act as a real estate broker or a real estate salesperson within this state without first obtaining a real estate license from the department, or to engage in the business of, act in the capacity of, advertise as, or assume to act as a mortgage loan originator within this state without having obtained a license endorsement. The commissioner may prefer a complaint for violation of this section before any court of competent jurisdiction, and the commissioner and his or her counsel, deputies, or assistants, may assist in presenting the law or facts at the trial.

1 *Prosecution of Violations:* It is the duty of the district attorney of each county in this state to
2 prosecute all violations of this section in their respective counties in which the violations
3 occur.”

4 23.

5 Pursuant to Code Section 10131 *Broker Defined:*

6 “A real estate broker within this meaning of this part is a person who, for a
7 compensation or in expectation of a compensation, regardless of the form or time of payment,
8 does or negotiates to do one or more of the following acts for another or others:

9 (a) Sells or offers to sell, buys or offers to buy, solicits prospective sellers or
10 purchasers of, solicits or obtains listings of, or negotiates the purchase, sale or
11 exchange of real property or a business opportunity.

12 (b) Leases or rents or offers to lease or rent, or places for rent, or solicits listings
13 of places for rent, or solicits for prospective tenants, or negotiates the sale,
14 purchase or exchanges of leases on real property, or on a business opportunity, or
15 collects rents from real property, or improvements thereon, or from business
16 opportunities.

17 (c) Assists or offers to assist in filing an application for the purchase or lease of,
18 or in locating or entering upon, lands owned by the state or federal government.

19 (d) Solicits borrowers or lenders for or negotiates loans or collects payments or
20 performs services for borrowers or lenders or note owners in connection with
21 loans secured directly or collaterally by liens on real property or on a business
22 opportunity.

23 (e) Sells or offers to sell, buys or offers to buy, or exchanges or offers to exchange
24 a real property sales contract, or a promissory note secured directly or collaterally

1 by a lien on real property or on a business opportunity, and performs services for
2 the holders thereof.”

3 24.

4 **Unlawful Employment or Payment of Compensation - Code Section 10137**

5 Pursuant to Code Section 10137 *Unlawful Employment or Payment of*
6 *Compensation – Penalty:*

7 “It is unlawful for any licensed real estate broker to employ or compensate,
8 directly or indirectly, any person for performing any of the acts within the scope of this chapter
9 who is not a license real estate broker, or a real estate salesperson licensed under the broker
10 employing or compensating him or her, or to employ or compensate, directly or indirectly, any
11 licensee for engaging in any activity for which a mortgage loan originator license endorsement is
12 required, if that licensee does not hold a mortgage loan originator license endorsement; provided,
13 however, that a licensed real estate broker may pay a commission to a broker of another state.
14 No real estate salesperson shall be employed by or accept compensation for activity requiring a
15 real estate license from any person other than the broker under whom he or she is at the time
16 licensed. It is unlawful for any licensed real estate salesperson to pay any compensation for
17 performing any of the acts within the scope of this chapter to any real estate licensee except
18 through the broker under whom he or she is at the time licensed. For a violation of any of the
19 provisions of this section, the commissioner may temporarily suspend or permanently revoke the
20 license of the real estate licensee, in accordance with the provisions of this part relating to
21 hearings.”

22 ///

23 ///

24 ///

25 ///

25.

Penalties for Unlicensed Person – Code Section 10139

Pursuant to Code Section 10139 *Penalties for Unlicensed Person*:

“Any person acting as a real estate broker, real estate salesperson, or mortgage loan originator without a license or license endorsement, or who advertises using words indicating that he or she is a real estate broker, real estate salesperson, or mortgage loan originator without being so licensed or without having obtained a license endorsement, shall be guilty of a public offense punishable by a fine not exceeding twenty thousand dollars (\$20,000), or by imprisonment in the county jail for a term not to exceed six months, or by both fine and imprisonment; or if a corporation, be punished by a fine not exceeding sixty thousand dollars (\$60,000). If a Real Estate Fraud Prosecution Trust Fund, as described in Section 27388 of the Government Code, exists in the county where a person or corporation is convicted, any fine collected from the person in excess of ten thousand dollars (\$10,000) or any fine collected from the corporation in excess of fifty thousand dollars (\$50,000) shall be deposited in that Real Estate Fraud Prosecution Trust Fund.”

///

///

///

///

///

///

///

///

///

///

Grounds for Revocation or Suspension –

Code Section 10176 (selected portions)

Pursuant to Code Section 10176 *Grounds for Revocation or Suspension*:

“The commissioner may, upon his or her own motion, and shall, upon the verified complaint in writing of any person, investigate the actions of any person engaged in the business or acting in the capacity of a real estate licensee within this state, and he or she may temporarily suspend or permanently revoke a real estate licensee at any time where the licensee, while a real estate licensee, in performing or attempting to perform any of the acts within the scope of this chapter has been guilty of any of the following:

(a) Making any substantial misrepresentation...

...

(i) Any other conduct, whether of the same or a different character than specified in this section, which constitutes fraud or dishonest dealing...”

///

///

///

///

///

///

///

///

///

///

///

27.

Further Grounds for Disciplinary Action –

Code Section 10177 (selected portions)

Pursuant to Code Section 10177 *Further Grounds for Disciplinary Action*
(selected portions):

“The commissioner may suspend or revoke the license of a real estate licensee, delay the renewal of a license of a real estate licensee, or deny the issuance of a license to an applicant, who has done any of the following:

...

(d) Willfully disregarded or violated the Real Estate Law (Part 1 (commencing with Section 10000)) or Chapter 1 (commencing with Section 11000) of Part 2 or the rules and regulations of the commissioner for the administration and enforcement of the Real Estate Law and Chapter 1 (commencing with Section 11000) of Part 2.

...

(g) Demonstrated negligence or incompetence in performing an act for which he or she is required to hold a license.

...

(j) Engaged in any other conduct, whether of the same or a different character than specified in this section, that constitutes fraud or dishonest dealing...”

///

///

///

///

///

///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

2

3
4

0

6
7
8
9
10

100

12
13
14
15
16

10

19
20
21
22

24

25

1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
3 action against all the licenses and license rights of Respondent EARLINE WILSON under the
4 Real Estate Law (Part I of Division 4 of the Business and Professions Code), and for such other
5 and further relief as may be proper under other applicable provisions of law.

6 Dated at Los Angeles, California: June 9, 2025.

7
8
9  _____
10
11 Supervising Special Investigator

12 cc: Earline Wilson
13 R. Dagnino
14 Sacto.
15
16
17
18
19
20
21
22
23
24
25
26