

FILED

MAY 14 2025

DEPT OF REAL ESTATE

By. [REDACTED]

JUDITH A. BURANDAY, Counsel (SBN 278115)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105
Tel: (213)-559-5990
Direct: (213) 443-9263
E-mail: Judith.Buranday@dre.ca.gov
Attorney for Complainant

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

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In the Matter of the Application of) No. H-43113 LA
WINIFRED ALLISON,)
Respondent.) STATEMENT OF ISSUES

The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of California, for Statement of Issues against WINIFRED ALLISON ("Respondent") is informed and alleges in his official capacity as follows:

1.

On or about October 16, 2024, Respondent made application to the Department of Real Estate ("Department") of the State of California for a real estate salesperson license.

2.

All references to the "Code" are to the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code and all references to the "Regulations" are to Title 16 of the California Code of Regulations.

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STATEMENT OF ISSUES

LICENSE DISCIPLINE BY ANOTHER AGENCY

3.

On or about December 27, 2022, the President of the Respiratory Care Board of California, Department of Consumer Affairs, issued a Decision and Order revoking the Respiratory Care Practitioner License No. RCP 17915, effective January 6, 2023, provided however the revocation was stayed and Respondent was placed on probation for three (3) years under certain terms and conditions. As more fully set forth in the Accusation issued on October 18, 2021, in the Respiratory Care Board's Case Number 7002021000306, Respondent violated Code sections 3750 subdivisions (j) and (k) and Regulations section 1399.370 subdivisions (a) and (c)(1) (falsified entries in a patient's records, dishonest act), Code section 3750 subdivisions (f) and (p) (negligence), and Code section 3755 subdivisions (a)(1)-(2) (unprofessional conduct).

4.

The suspended revocation of Respondent's respiratory care practitioner license, as alleged in Paragraph 3 above, constitutes cause for denial of Respondent's application for a real estate license under Code section 10177(f).

5.

These proceedings are brought under the provisions of Code section 10100 and Sections 11500 through 11528 of the California Government Code.

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1 WHEREFORE, the Complainant prays that the above-entitled matter be set for
2 hearing and, upon proof of the charges contained herein, that the Commissioner refuse to
3 authorize the issuance of, and deny the issuance of, a real estate salesperson license to
4 Respondent WINIFRED ALLISON and for such other and further relief as may be proper
5 under other applicable provisions of law.
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7 Dated at Los Angeles, California this 8th day of May, 2025.
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11 Ray Dagnino
12 Supervising Special Investigator
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24 cc: WINIFRED ALLISON
25 Ray Dagnino
26 Sacto.
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