

1 TRULY SUGHRUE, Counsel  
2 State Bar No. 223266  
3 Department of Real Estate  
4 P.O. Box 137007  
5 Sacramento, CA 95813-7007

6 Telephone: (916) 576-8700  
7 (916) 576-7847 (Direct)  
8 Fax: (916) 263-3767

**FILED**

MAR 05 2019

DEPARTMENT OF REAL ESTATE  
By L. Knapp

9 BEFORE THE DEPARTMENT OF REAL ESTATE  
10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of

13 PATRICIA MARIE CONWAY,

Respondent.

No. H-6803 SAC

ACCUSATION

14 The Complainant, TRICIA D. PARKHURST, in her official capacity as a  
15 Supervising Special Investigator of the Department of Real Estate ("Department") of the State of  
16 California, brings this Accusation against Respondent PATRICIA MARIE CONWAY  
17 ("Respondent"), and is informed and alleges as follows:

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19 Respondent is presently licensed and/or has license rights under the Real Estate  
20 Law (Part 1 of Division 4 of the California Business and Professions Code) ("Code") as a real  
21 estate salesperson.

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23 On or about May 24, 2018, in the Superior Court of the State of California,  
24 County of Placer, Case No. 72-009785A, Respondent was convicted of violating Section 273a(a)  
25 (cruelty to child by abuse, neglect or endangering health) of the California Penal Code, a crime  
26 which bears a substantial relationship under Section 2910, Title 10, of the California Code of  
27 Regulations (Regulations) to the qualifications, functions or duties of a real estate licensee.

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At no time did Respondent provide notice of the bringing of an indictment, the charging of a felony, the conviction of Respondent of one or more misdemeanor and/or felony convictions, and/or any disciplinary action taken by another licensing agency, as required by Section 10186.2 of the Code.

GROUNDS FOR DISCIPLINE

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The facts identified in paragraph 2, constitutes cause under Sections 490 and 10177(b) of the Code, for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

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The facts alleged in paragraphs 2 through 3 constitute cause under Sections 10177(d) and 10186.2 of the Code for suspension or revocation of Respondent's license under the Real Estate Law.

COST RECOVERY

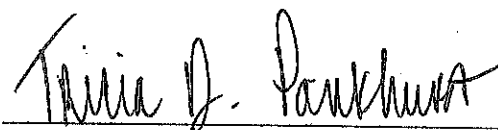
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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the Commissioner may request the Administrative Law Judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Code, for the cost of

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1 investigation and enforcement as permitted by law, and for such other and further relief as may  
2 be proper under the provisions of law.

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5 TRICIA D. PARKHURST  
6 Supervising Special Investigator

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8 Dated at Sacramento, California,  
9 this 1st day of March, 2019

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13 DISCOVERY DEMAND

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15 Pursuant to Sections 11507.6, *et seq.* of the *Government Code*, the Department of  
16 Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the  
17 *Administrative Procedure Act*. Failure to provide Discovery to the Department of Real Estate  
18 may result in the exclusion of witnesses and documents at the hearing or other sanctions that the  
19 Office of Administrative Hearings deems appropriate.