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FILED

AUG 13 2020

DEPARTMENT OF REAL ESTATE  
By X. Knapp

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of: ) H-6972 SAC  
12 )  
13 MATTHEW ROWAN DAVIES, ) ACCUSATION  
14 )  
Respondent. )

15 The Complainant, TRICIA D. PARKHURST, acting in her official capacity as a  
16 Supervising Special Investigator of the State of California, for cause of Accusation against  
17 MATTHEW ROWAN DAVIES ("Respondent"), is informed and alleges as follows:

18 1.

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

22 CRIMINAL CONVICTIONS

23 2.

24 On or about October 9, 2019, in the Superior Court of the State of California,  
25 County of San Joaquin, Case No. CR-2019-2996, Respondent was convicted of violating Penal  
26 Code Section 245(a)(4) (assault with force likely to produce great bodily injury), a felony which

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1 bears a substantial relationship under Section 2910, Title 10, California Code Regulations to  
2 the qualifications, functions or duties of a real estate licensee

3 3.

4 The facts alleged above in Paragraph 2 constitute grounds under sections 490  
5 and 10177(b) of the Code for suspension or revocation of all licenses and license rights of  
6 Respondent under Part 1 of Division 4 of the Code (herein "the Real Estate Law").

7 MATTERS IN AGGRAVATION

8 4.

9 On or about December 13, 2013, in the United States District Court for the  
10 Easter District of California, Case No. 2:12CR00255-01, Respondent was convicted of violating  
11 21 U.S.C. § 846 and 841(a)(1) (conspiracy to manufacture, distribute and possess with the intent  
12 to distribute marijuana), two (2) counts of 21 U.S.C. § 841(a)(1) (manufacturing marijuana) and  
13 seven (7) counts of 21 U.S.C § 841(a)(1) (distributing marijuana), all felonies.

14 COST RECOVERY

15 5.

16 The Department will seek to recover cost of this suit pursuant to section 10106 of  
17 the Code which provides, in pertinent part, that in any order issued in resolution of a disciplinary  
18 proceeding before the Department, the commissioner may request the administrative law judge  
19 to direct a licensee found to have committed a violation of this part to pay a sum not to exceed  
20 the reasonable costs of the investigation and enforcement of the case.

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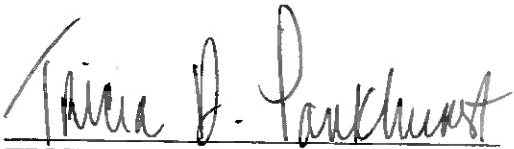
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1           WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
2 of this Accusation and that upon proof thereof, a decision be rendered revoking all licenses and  
3 license rights of Respondent under the Real Estate Law, for the cost of investigation and  
4 enforcement as permitted by law, and for such other and further relief as may be proper under  
5 other provisions of law.

6  
7   
8 TRICIA D. PARKHURST  
Supervising Special Investigator

9 Dated at Sacramento, California,  
10 this 29th day of July, 2020.

11  
12 DISCOVERY DEMAND

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