

CALIFORNIA COURT OF APPEAL, FOURTH APPELLATE DISTRICT,
DIVISION TWO

People v. Rifat

People v. Rifat · No. E086574 · Decided May 27, 2026

SUMMARY

The California Court of Appeal affirmed the denial of Matthew David Murray Rifat’s petition to seal arrest and related records under Penal Code section 851.93. The court held that his later guilty plea in a related criminal case created a causal nexus between the conviction and the arrest underlying the dismissed indictment, making the arrest ineligible for sealing. The opinion is certified for publication.

CASE DETAILS

COURT	California Court of Appeal, Fourth Appellate District, Division Two
WRITING FOR THE COURT	McKinster, Acting Presiding Justice; McKinster, Acting P. J.; Fields, J.; Menetrez, J.
JURISDICTION	California Court of Appeal, Fourth Appellate District, Division Two
DECIDED	May 27, 2026
DOCKET	E086574
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from an order of the Riverside County Superior Court denying defendant's petition to seal his arrest and related records under Penal Code section 851.93, discussed in the opinion under Penal Code section 851.91.
STANDARD OF REVIEW	The appellate court defers to the trial court’s factual findings when supported by substantial evidence but independently reviews whether the defendant met the statutory burden.
PRECEDENTIAL VALUE	Published and certified for publication
PARTIES	Matthew David Murray Rifat, Defendant and Appellant v. The People, Plaintiff and Respondent

TOPICS

- post-conviction relief
- criminal procedure
- statutory interpretation
- appellate procedure
- standard of review

PRACTICE AREAS

criminal procedure

post-conviction relief

appellate procedure

statutory interpretation

QUESTIONS PRESENTED

1. Whether Rifat's arrest in case No. RIF1990022 resulted in a conviction within the meaning of Penal Code section 851.91 when he pleaded guilty in a related later-filed case and the indictment case was dismissed pursuant to the plea agreement.
2. Whether the superior court properly found a causal nexus between the arrest in RIF1990022 and the conviction in RIF2401013, making Rifat ineligible to have the RIF1990022 arrest records sealed as a matter of right.

HOLDINGS

1. An arrest did not qualify as one that 'did not result in a conviction' under Penal Code section 851.91 where the later-filed complaint and guilty plea were causally linked to the conduct underlying the earlier arrest and indictment, even though the earlier case itself was dismissed.
2. The superior court properly denied Rifat's petition to seal the arrest and related records because the conviction in RIF2401013 derived from the behavior that led to his arrest in RIF1990022.

KEY QUOTATIONS

“Thus, because there was a causal nexus between defendant’s arrest in RIF1990022 and his conviction in RIF2401013, defendant’s conviction derived from the behavior that led to his arrest.” (9-10)

“The complaint filed by the prosecuting attorney in RIF2401013 was an accusatory pleading based on defendant’s arrest in RIF1990022. Therefore, the court properly denied defendant’s petition.” (10)

FACTUAL BACKGROUND

Rifat was arrested after a grand jury indictment in case No. RIF1990022 charging conspiracy, fraudulent claims, and money laundering related to alleged workers' compensation fraud. While that case was pending, the People filed a separate complaint in case No. RIF2401013 charging conduct occurring during the same general period and involving Penal Code section 550. Rifat pleaded guilty in the second case in exchange for dismissal of the indictment case, received credit for time served in the first case, and was placed on probation. He then sought to seal the arrest records from the dismissed indictment case.

PROCEDURAL HISTORY

A grand jury indictment charged Rifat and others with conspiracy and numerous counts of fraudulent claims and money laundering in Riverside County Superior Court case No. RIF1990022. In 2024, the prosecution charged Rifat in a separate case, RIF2401013, with felony acceptance of business with reckless disregard for whether the business intended to violate Penal Code section 550. Rifat pleaded guilty pursuant to an agreement under which the People dismissed the indictment case, and the court placed him on probation. Rifat later petitioned to seal the arrest and related records associated with RIF1990022; the superior court denied the petition, and the Court of Appeal affirmed.

DISPOSITION

affirmed

CASES CITED

- People v. D.C. (2020) 54 Cal.App.5th 727, 733
- People v. E.B. (2020) 51 Cal.App.5th 47, 53-54
- People v. Esmaili (2013) 213 Cal.App.4th 1449, 1457-1458

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