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Department of Social Services
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7 Attorneys for Complainant

8 BEFORE THE
DEPARTMENT OF SOCIAL SERVICES
9 STATE OF CALIFORNIA

10 IN THE MATTER OF:

11 KATRIEN SEDIQI
12 dba Sediqi Family Child Care
17472 Matinal Road
13 San Diego, CA 92127

CDSS No. 7715170101
OAH No.
ACCUSATION
(LICENSE REVOCATION)

14 KATRIEN SEDIQI

CDSS No. 7715170101B
ACCUSATION
(EXCLUSION ACTION)

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16
17 ABDULLAH SEDIQI

CDSS No. 7715170101C
ACCUSATION
(EXCLUSION ACTION)

18
19 ROIN SEDIQI

CDSS No. 7715170101D
ACCUSATION
(EXCLUSION ACTION)

20 Respondents.
21

22 JURISDICTION

23 1. This matter arises under the California Child Day Care Facilities Act,
24 Health and Safety Code section 1596.70 et seq., which governs the licensing and
25 operation of family child care homes.

26 2. The regulations which govern the licensing and operation of family child
27 care homes are contained in California Code of Regulations, title 22, section 102351.1

1 et seq.¹ The term “family child care home”, as used in regulation section 102352(f)(1),
2 is the same as the term “family day care home” as used in Health and Safety Code
3 section 1596.78(a).

4 3. The California Department of Social Services (“Department”) is the
5 agency of the State of California responsible for the licensing and inspection of family
6 child care homes.

7 4. The Department may prohibit a licensee from employing, continuing the
8 employment of, allowing in, or allowing contact with clients of a licensed facility by any
9 employee, prospective employee, or other person who is not a client of a family child
10 care home pursuant to Health and Safety Code section 1596.8897.

11 5. Administrative proceedings before the Department must be conducted in
12 conformity with the provisions of the California Administrative Procedure Act, Chapter 5,
13 Government Code section 11500 et seq.

14 6. Pursuant to Health and Safety Code section 1596.8897(f), the
15 Department may institute or continue a disciplinary proceeding against a person
16 following the resignation, withdrawal of employment application, or change of duties, or
17 any discharge, failure to hire, or reassignment of the person by the licensee or if the
18 person no longer has contact with clients of the facility.

19 7. Pursuant to Health and Safety Code section 1596.854, the Department
20 may institute or continue a disciplinary proceeding against a licensee following the
21 suspension, expiration, or forfeiture of a license.

22 8. Pursuant to Health and Safety Code sections 1596.887(b), 1596.889,
23 and 1596.8897(e), the standard of proof to be applied in this proceeding is the
24 preponderance of evidence.

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27 ¹ Subsequent references to any regulation section(s) are to Title 22 of the California Code of Regulations.

1 THE PARTIES

2 9. Complainant **PAMELA DICKFOSS** is the Deputy Director of the
3 *Community Care Licensing Division of the Department*. Pursuant to *Government Code*
4 section 11503, Complainant files this Accusation in her official capacity.

5 10. Respondent **KATRIEN SEDIQI** is licensed by the Department to operate
6 a family child care home at 17472 Matinal Road, San Diego, California ("facility").
7 The facility was initially licensed on July 8, 2013. A copy of Respondent **KATRIEN**
8 **SEDIQI's** most recent license setting forth the capacity, limitations, and effective dates
9 accompanies this Accusation as **ATTACHMENT A** and is incorporated by reference.

10 11. Respondent **ABDULLAH SEDIQI** resides in the facility of or has contact
11 with the clients of the family child care home. Respondent **ROIN SEDIQI** resides in the
12 facility of or has contact with the clients of the family child care home.

13 12. Respondent **KATRIEN SEDIQI**, by virtue of licensure, must operate in
14 accordance with the statutes and regulations governing the licensing and operation of
15 family child care homes. Respondents **ABDULLAH SEDIQI** and **ROIN SEDIQI**, by
16 virtue of presence in or contact with clients of a family child care home, is subject to the
17 jurisdictional provisions of *Health and Safety Code* sections 1596.871 and 1596.8897.
18 Copies of the applicable statutes and regulations accompany this Accusation as
19 **ATTACHMENT B** and are incorporated by reference.

20 FACTUAL ALLEGATIONS

21 SUBJECT MATTER: PERSONAL RIGHTS VIOLATION/UNSAFE ENVIRONMENT

22 APPLICABLE LAW: Health and Safety Code sections 1596.871, 1596.8897, and
23 1596.885

24 Regulation sections 102402, 102417, and 102423

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1 ALLEGATIONS:

2 13. During the period of licensure, Respondent **KATRIEN SEDIQI**
3 failed to provide a safe environment and violated or allowed others to violate the
4 personal rights of children in care including as follows:

5 A. From on or about October 14, 2014 to June 12, 2015, Respondent
6 **ABDULLAH SEDIQI** sexually touched and took inappropriate pictures with
7 children in care, as follows:

8 1) Respondent **ABDULLAH SEDIQI** touched a child in
9 care's genital area with his hand, and took photographs of this act
10 while at the facility;

11 2) Respondent **ABDULLAH SEDIQI** took photographs of
12 at least four children in care's vaginal areas while at the facility;

13 3) Respondent **ABDULLAH SEDIQI** took photographs
14 under the skirt of children in care while at the facility; and,

15 B. On or about June 12, 2015, and at other times the exact dates of
16 which are unknown to Complainant, Respondent **ABDULLAH SEDIQI**
17 possessed at least 23 photos of child pornography.

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19 SUBJECT MATTER: FAILURE TO REPORT

20 APPLICABLE LAW: Health and Safety Code sections 1596.885(c) and
21 1596.8897(a)(2)
22 Regulation section 102416.2

23 ALLEGATIONS:

24 14. Respondent **KATRIEN SEDIQI** failed to report **ABDULLAH SEDIQI's**
25 arrest for child pornography and lewd and lascivious conduct, on or about June 15,

26 15.

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1 SUBJECT MATTER: CONDUCT INIMICAL

2 APPLICABLE LAW: Health and Safety Code sections 1596.885(c) and

3 1596.8897(a)(2)

4 Regulation section 102402

5 ALLEGATIONS:

6 15. On or about June 12, 2015, and at other times the exact dates of which
7 are unknown to Complainant, Respondent **ABDULLAH SEDIQI** took photographs and
8 videos under the skirts of women, without their knowledge or consent.

9 16. On or about June 14, 2015, Respondent **ROIN SEDIQI** had 14 grams of
10 cocaine in his possession and accessible to children in care while at the facility;

11 17. Respondents engaged in conduct that is inimical to the health, morals,
12 welfare, or safety of either an individual in or receiving services from the facility, or the
13 people of the State of California as alleged in paragraphs 13 through 15, above, and
14 incorporated herein by reference.

15 CAUSE FOR LICENSE REVOCATION AND ORDER OF EXCLUSION

16 18. The facts alleged in paragraphs 13 through 15, individually or jointly,
17 provide cause, pursuant to Health and Safety Code section 1596.885(a)-(d) to revoke
18 Respondent **KATRIEN SEDIQI**'s license to operate the facility; and pursuant to Health
19 and Safety Code section 1596.8897 to prohibit Respondents **KATRIEN SEDIQI**,
20 **ABDULLAH SEDIQI** and **ROIN SEDIQI**'s employment in, presence in, and contact with
21 clients of, any facility licensed by the Department or certified by a licensed foster family
22 agency and from holding the position of member of the board of directors, executive
23 director, or officer of the licensee of any facility licensed by the Department, for the
24 remainder of Respondents respective lives.


25 19. The facts alleged in paragraphs 13 through 16, individually or jointly,
26 constitute conduct by Respondents **KATRIEN SEDIQI**, **ABDULLAH SEDIQI**, and **ROIN**
27 **SEDIQI** which is inimical to the health, safety, morals or welfare of clients receiving care

1 from the facility, or to the people of the State of California. These facts provide cause,
2 pursuant to Health and Safety Code sections 1596.885(c) and 1596.8897, to revoke the
3 license to operate the facility, and to prohibit Respondents **KATRIEN SEDIQI,**
4 **ABDULLA SEDIQI, and ROIN SEDIQI's** employment in, presence in, and contact with
5 clients of, any facility licensed by the Department or certified by a licensed foster family
6 agency and from holding the position of member of the board of directors, executive
7 director, or officer of the licensee of any facility licensed by the Department, for the
8 remainder of Respondents respective lives.

9 **PETITION FOR RELIEF**

10 20. WHEREFORE, Complainant requests that Respondent **KATRIEN**
11 **SEDIQI's** license to operate a family child care home be revoked and Respondents
12 **KATRIEN SEDIQI, ABDULLAH SEDIQI and ROIN SEDIQI** be prohibited for the
13 remainder of Respondents respective lives, from employment in, presence in, and
14 contact with clients of, any facility licensed by the Department or certified by a licensed
15 foster family agency and from holding the position of member of the board of directors,
16 executive director, or officer of the licensee of any facility licensed by the Department.

17 DATED: JUN 23 2015

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19 PAMELA DICKFOSS
20 Deputy Director
21 Community Care Licensing Division
22 California Department of Social Services
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24
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ATTACHMENT A



State of California

Department of Social Services

Facility Number: 376624322

Effective Date: 11/14/2013

Total Capacity: 14

In accordance with applicable provisions of the Health and Safety Code of California, and its rules and regulations; the Department of Social Services hereby issues

this License to

SEDIQI, KATRIEN

to operate and maintain a
FAMILY DAY CARE HOME

Name of Facility

SEDIQI, KATRIEN FAMILY CHILD CARE
17472 MATINAL ROAD
SAN DIEGO, CA 92127

This License is not transferable and is granted solely upon the following:

MAX. CAP (WHEN THERE IS AN ASSISTANT PRESENT): 12 - NO MORE THAN 4 INFANTS.
CAP 14 - NO MORE THAN 3 INFANTS. 1 CHILD IN KINDERGARTEN OR ELEMENTARY
SCHOOL AND 1 CHILD AT LEAST AGE 6.

Client Groups Served:

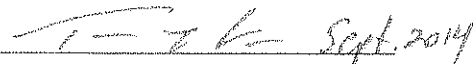
CHILDREN / INFANT

Complaints regarding services provided in this facility should be directed to:

CCLD Regional Office

(619) 767-2200

Pamela Dickfoss
Deputy Director,
Community Care Licensing Division


Authorized Representative of Licensing Agency