

1 LEGAL DIVISION
Department of Social Services
2 Office of Chief Counsel
MARK M. REESE
3 Assistant Chief Counsel
CONNIE SKOW, State Bar No. 137670
4 Senior Staff Attorney
744 P Street, MS 8-5-161
5 Sacramento, CA 95814
Telephone Number: (916) 654-1106
6 Facsimile Number: (916) 654-2134

7 Attorneys for Complainant

8 BEFORE THE
DEPARTMENT OF SOCIAL SERVICES
9 STATE OF CALIFORNIA

10 IN THE MATTER OF:

11 FAMILIES FIRST INC.
dba Families First Inc.,
12 Psychiatric Treatment
2100 5th Street
13 Davis, CA 95618

CDSS No. 7013158202
OAH No.

ACCUSATION
(LICENSE REVOCATION)

14
15 AUDRIE L. MEYER

CDSS No. 7013158202B

ACCUSATION
(EXCLUSION ACTION)

16
17
18 AUDRIE L. MEYER

CDSS No. 7013158202C

ACCUSATION
(REVOCAION OR FORFEITURE OF
ADMINISTRATOR CERTIFICATE)

19
20
21 GORDON RICHARDSON

CDSS No. 7013158202D

ACCUSATION
(EXCLUSION ACTION)

22 Respondents.
23

24 **JURISDICTION**

25 1. This matter arises under the California Community Care Facilities Act,
26 Health and Safety Code § 1500 et seq., which governs the licensing and operation of
27 group homes.

1 2. The regulations which govern the licensing and operation of group
2 homes are contained in Title 22, California Code of Regulations § 80000 et seq., and
3 § 84000 et seq.¹

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 group
6 homes and for certifying individuals to be administrators of group 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 group home
10 pursuant to Health and Safety Code § 1558 and may revoke or deem forfeited the
11 certificate of an administrator pursuant to Health and Safety Code §§ 1550 and
12 1522.41(g).

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

16 6. Pursuant to Health and Safety Code § 1553, the Department may
17 institute or continue a disciplinary proceeding against a licensee following the
18 suspension, expiration, or forfeiture of a license.

19 7. Pursuant to Health and Safety Code § 1558(f), the Department may
20 institute or continue a disciplinary proceeding against a person following the resignation,
21 withdrawal of employment application, or change of duties, or any discharge, failure to
22 hire, or reassignment of the person by the licensee or if the person no longer has
23 contact with clients of the facility.

24 8. Pursuant to Health and Safety Code §§ 1558(e) and 1551(b), the
25 standard of proof to be applied in this proceeding is the preponderance of evidence.

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

THE PARTIES

1
2 9. Complainant **JEFFREY HIRATSUKA** is the Deputy Director of the
3 Community Care Licensing Division of the Department. Pursuant to Government Code
4 § 11503, complainant files this Accusation in his official capacity.

5 10. Respondent **FAMILIES FIRST INC.**, ("Respondent Families First") is a
6 California corporation licensed by the Department to operate a group home doing
7 business as Families First Inc., Psychiatric Treatment, with a capacity of 72 children,
8 located at 2100 5TH Street, Davis, California ("facility"). The facility was initially licensed
9 on November 1, 1995. A copy of respondent Families First's most recent license setting
10 forth the capacity, limitations, and effective dates accompanies this Accusation as
11 **ATTACHMENT A** and is incorporated by reference.

12 11. Respondent **AUDRIE L. MEYER**² ("Respondent Meyer") is employed by
13 respondent Families First Inc., as the Clinical Director and Administrator of their facility.
14 Further, during the period between February 26, 2008, and August 15, 2011,
15 respondent Meyer was employed by Triad Family Services Inc., a licensed foster family
16 agency located in Sacramento, California; and, between September 13, 2008, and
17 July 10, 2012, employed by Compass Rose Inc., a corporation licensed by the
18 Department to operate several group homes located in Orangevale and Loomis,
19 California.

20 12. Respondent Meyer was certified on May 17, 2012, to be a group home
21 administrator. A copy of respondent Meyer's most recent administrator certificate
22 accompanies this Accusation as **ATTACHMENT B** and is incorporated by reference.

23 13. Respondent **GORDON RICHARDSON** ("Respondent Richardson") is
24 employed by respondent Families First Inc., as its Executive Director, Capital Region.
25 Further, during the period between August 25, 2000 and October 7, 2008, respondent
26

27 ² Respondent Audrie L. Meyer is also known as Audrie Lynn Meyer.

1 Richardson was employed by Stanford Lathrop Memorial Home for Friendless Children,
2 a corporation licensed by the Department to operate a group home and foster family
3 agency located in Orangevale, California; and between October 7, 2008 and
4 February 29, 2012, employed by Stanford Youth Solutions, a corporation licensed by
5 the Department to operate a foster family agency located in Sacramento, California.

6 14. Respondent Families First, by virtue of licensure, must operate in
7 accordance with the statutes and regulations governing the licensing and operation of
8 group homes.

9 15. Respondents Meyer and Richardson, by virtue of employment,
10 prospective employment, presence in or contact with clients of a group home, are
11 subject to the jurisdictional provisions of Health and Safety Code § 1558. Respondent
12 Meyer, by virtue of administrator certification, must comply with the statutes and
13 regulations governing the certification of administrators pursuant to Health and Safety
14 Code §§ 1522.41 and 1550 and Regulation §§ 84064.4 and 84064.5.

15 Copies of the applicable statutes and regulations accompany this Accusation
16 as **ATTACHMENT C** and are incorporated by reference.

17 **FACTUAL ALLEGATIONS**

18 **SUBJECT MATTER:** VIOLATION OF PERSONAL RIGHTS; LACK OF CARE AND
19 SUPERVISION; INADEQUATE STAFFING/PERSONNEL
REQUIREMENTS; RUNAWAY PLAN

20 **APPLICABLE LAW:** Health & Safety Code §§ 1550 and 1558

21 CCR §§ 80000, 80042, 80046, 80061, 80063, 80065, 80078,
22 84000, 84064.4, 84065, 84065.2, 84065.5, 84072, 84078,
84365.5 and 84322.2

23 **ALLEGATIONS:**

24 16. During the period between January 2012 and June 4, 2013, and for an
25 unknown period before and after, the exact dates of which are unknown to complainant
26 at this time, respondents Families First, Audrie L. Meyer and Gordon Richardson failed
27 to ensure the personal rights of children in care and provide for their care and safety

1 without exploitation or prejudice; failed to ensure the provision of adequate care and
2 supervision; failed to ensure that there was adequate and competent staffing to meet
3 the needs of the children; allowed children to leave the facility without maintaining
4 appropriate supervision of the children; and, further, endangered the health and safety
5 of children in care by failing to comply with their respective responsibilities. Specific
6 instances include, but are not limited to, the following:

7 A. On or about June 1, 2013, Child No. 1 (age 14) physically
8 assaulted Child No. 2 (age 11). Child No. 1 and No. 2 were at a local park for
9 several hours with at least five other children, Child No. 3, No. 4, No. 5, No. 6
10 and/or No. 7, all of whom were absent without leave (AWOL) from the facility and
11 unsupervised in the community. Child No. 2 sustained injuries as a result of the
12 assault.

13 Further, in a separate incident on or about May 31, 2013, Child
14 No. 1 physically assaulted Child No. 8 (age 15) at the same local park. At the
15 time of this incident, there were at least nine other children, Child No. 2, No. 3,
16 No. 4, No. 6, No. 7, No. 9, No. 10, No. 11 and No. 12 present. Two persons in
17 the community intervened to stop the fight. All of the children involved were
18 AWOL from the facility. Respondents knew or should have known about this
19 incident and failed to take appropriate action to ensure appropriate supervision of
20 one or more of the same children who subsequently went AWOL again on
21 June 1, 2013.

22 B. On or about May 31, 2013, Child No. 11 (age 11) was sexually
23 assaulted by Child No. 3 (age 14) at a local park. Further, Child No. 4, No. 6,
24 No. 13 and No. 14 were present and assisted in the assault; Child No. 1 was also
25 present. The children left the facility without appropriate supervision by facility
26 staff; Child No. 11 was AWOL from the facility for approximately six hours
27 unsupervised before she returned on her own. Respondents failed to report this

1 incident to the Licensing Agency as required. Further, on or about May 29, 2013,
2 respondents knew or should have known that Child No. 3 engaged in sexual
3 intercourse with another child who did so out of fear because Child No. 3 had a
4 temper and was reportedly physically abusive.

5 C. On or about May 30, 2013, Child No. 9 (age 12) was sexually
6 assaulted by Child No. 1 (age 14) after the children went AWOL from the facility
7 and were out most of the night consuming alcohol and smoking cigarettes.
8 Respondents failed to report this incident to Child No. 9's authorized
9 representative in a timely manner; and further, failed to report the incident to the
10 Licensing Agency as required.

11 D. On or about May 30, 2013, a group of approximately ten (10)
12 children, Child No. 1, No. 2, No. 3, No. 6, No. 7, No. 8, No. 9, No. 11, No. 12
13 and/or No. 13 (ages 11 to 15), caused a disturbance at a local Taco Bell in Davis
14 while AWOL from the facility and unsupervised in the community; specifically,
15 one or more of the children yelled profanities at the clerks and asked customers
16 for money.

17 E. On or about May 14, 2013, Child No. 15 (age 13) was sexually
18 assaulted by Child No. 6, a non-resident minor, after she went AWOL from the
19 facility. Child No. 15 was threatened with harm if she disclosed the assault. On
20 or about May 6, 2013, respondents knew or should have known that Child No. 15
21 was leaving the facility multiple times a day and night and engaging in high risk
22 behaviors.

23 F. Between May 10, 2013 and May 29, 2013, Child No. 5 (age 13) and
24 No. 17 (age 14) engaged in sexual activity with Child No. 13 (age 14) while
25 AWOL because they were fearful of him. Further, Child No. 13 engaged in
26 sexually activity with Child No. 4 (age 15) and No. 18 (age 17), and/or other
27 children while AWOL from the facility; Child No. 4 requested a pregnancy test

1 from staff. Respondents knew or should have known that Child No. 13 was
2 leaving the facility daily, staying out for multiple hours at a time without
3 appropriate supervision and engaging in high risk behaviors.

4 G. Between May 7, 2013 and May 22, 2013, Child No. 5 (age 13) met
5 with a non-resident male at a local park after she went AWOL from the facility.
6 This male provided Child No. 5 with alcohol, took the child to a local hotel and
7 sexually assaulted her on several occasions. Further, Child No. 16 also
8 attempted to have sex with Child No. 5. In addition, Child No. 5 engaged in
9 sexual activity with Child No. 3 while AWOL from the facility. On or about May 8,
10 2013, respondents knew or should have known that Child No. 5 was leaving the
11 facility daily, multiple times per day, and staying out for hours at a time without
12 appropriate supervision and engaging in high risk behaviors.

13 [Health & Safety Code §§ 1550(a)-(c) and 1558(a)(1)-(2) & (a)(4); and, CCR §§ 80000
14 (b); 80042(a); 80046(a); 80061(a), (b)(1)(E)-(F) & (e); 80063(a), 80065(a) & (l); 80078
15 (a); 84000(a); 84064.4(a); 84065(a)-(b); 84065.2(b)(1); 84065.5(c); 84072(c)(13)-(15);
16 84078(a) & (b); and, 84322.2(a) & (c)(1)-(6).]

17 17. During the period between February 3, 2012 and June 4, 2013, and for
18 an unknown period before, the exact dates of which are unknown to the complainant,
19 respondent Families First, Audrie L. Meyer and Gordon Richardson failed to ensure that
20 there was appropriate supervision and adequate staff to child ratios in that children were
21 routinely and frequently leaving the facility without adult supervision. Further,
22 respondents failed to ensure that facility staff was properly trained and utilizing proper
23 non-physical interventions to discourage children from leaving or who were attempting
24 to leave the facility. While AWOL, one or more children were subjected to sexual abuse
25 or exploitation by persons in the community; engaged in inappropriate sexual activity
26 with each other or others in the community; and, further, engaged in illegal activity such
27 as shoplifting, theft, fighting, loitering, panhandling, consuming alcohol, smoking

1 cigarettes, doing drugs and other self-endangering behavior in the local community. In
2 addition, in at least one instance, a child purchased or stole two knives from a store,
3 returned to the facility, brandished the knives and threatened staff. [Health & Safety
4 Code §§ 1550(a)-(c) and 1558(a)(1)-(2) & (a)(4); and, CCR §§ 80000(b); 80042(a);
5 80046(a); 80063(a), 80065(a) & (l); 80078(a); 84000(a); 84064.4(a); 84065(a)-(b);
6 84065.2(b)(1); 84065.5(c); 84072(c)(13)-(15); 84078(a) & (b); 84322.2(a) & (c)(1)-(6);
7 and, 84365.5(a)-(b).]

8 18. During the period between February 3, 2012 and June 4, 2013, the exact
9 dates of which are unknown to the complainant, there were many instances of children
10 or groups of children running away from the facility reported to the Davis Police
11 Department and law enforcement intervention sought by facility staff. Between
12 February 3, 2012 and December 19, 2012, there were approximately 24 reported
13 instances of children running away from the facility and this number increased to
14 approximately 81 reports in a six month period between January 1, 2013 and June 4,
15 2013. In multiple instances, facility staff did not follow or shadow the child when he/she
16 left the facility without permission; or, when the children were located in the community
17 by law enforcement and the facility notified, staff reported that they did not have the
18 staffing or ability to pick up the missing children. In some instances, children were later
19 found in various counties throughout California by law enforcement; one child was found
20 on the freeway by the California Highway Patrol. Further, there were multiple instances
21 in which children were determined by law enforcement to be a danger to themselves or
22 others pursuant to Welfare and Institutions Code § 5150; one or more of the children
23 who ran away from the facility went to the local police department themselves and
24 requested a 5150 placement hold. In addition, there were instances in which law
25 enforcement were assaulted by the children while attempting to take them into
26 protective custody and return them to the facility. [Health & Safety Code §§ 1550(a)-(c)
27 and 1558(a)(1)-(2) & (a)(4); and, CCR §§ 80000(b); 80042(a); 80046(a); 80063(a),

1 80065(a) & (l); 80078(a); 84000(a); 84064.4(a); 84065(a)-(b); 84065.2(b)(1); 84065.5(c);
2 84072(c)(13)-(15); 84078(a) & (b); 84322.2(a) & (c)(1)-(6); and, 84365.5(a)-(b).]

3 19. As a factor in aggravation to the violations alleged in paragraphs 16
4 through 18, and paragraph 21, below, respondents Families First, Audrie L. Meyer and
5 Gordon Richardson failed or otherwise refused to comply, maintain, implement or
6 operate in compliance with the facility's own Plan of Operation and Emergency
7 Intervention Plan, including their Plan for Dealing with Runaway Behavior, which
8 provides, in pertinent part that:

9 **Prevention**

10 There are many ways to aid in the prevention of runaway behavior. The
11 following preventative techniques should be practiced on a regular basis by
all child care staff.

- 12 1. FamiliesFirst, Inc (sic) staff are responsible to know each child's
13 treatment plan and whether or not that child would be in danger if out of
14 supervision, i.e., off grounds by himself. This information should be
included in the *child's needs and service (sic) plan*.
- 15 2. FamiliesFirst, Inc (sic) staff will communicate clearly with all team
16 members when there is suspicion that a child may run away and develop
17 a plan of action which may include:
 - 18 a. [i]ncreasing supervision
 - 19 b. limiting outings or trips off site
 - 20 c. proximity control
 - 21 d. [c]ounseling
- 22 3. FamiliesFirst, Inc (sic) staff will develop individual contracts to motivate
23 children with runaway behaviors to stay at the residence.
- 24 4. FamiliesFirst, Inc (sic) will build relationships with the children so that
25 their bond will help to effect the child's decision making.
- 26 5. FamiliesFirst, Inc (sic) staff will ensure children are in eye sight, and
27 overnight staff will complete regular bed checks that are documented in
the house communication log and electronically through time card
punches.

* * * * *

1 If a child does runaway, FamiliesFirst, Inc (sic) staff will call notify the campus
2 supervisor and shadow the child. While shadowing Families First, Inc (sic)
3 staff will continue to attempt verbal communication to encourage child to
4 return. If this is escalating, the child further[,] FamiliesFirst Inc (sic) staff will
5 follow at a distance to observe the child's direction and state of mind. The
6 campus supervisor will notify clinical of child being off campus.

7 **SUBJECT MATTER:** INAPPROPRIATE RESTRAINTS; VIOLATION OF
8 PERSONAL RIGHTS; LACK OF CARE AND SUPERVISION;
9 EMERGENCY INTERVENTION PLAN

10 **APPLICABLE LAW:** Health & Safety Code §§ 1550 and 1558

11 CCR §§ 80000, 80022, 80042, 80046, 80061, 80063, 80064,
12 80065, 80074, 80078, 84000, 84061, 84064.4, 84065.2,
13 84072, 84078, 84300, 84300.1, 84322.1, 84361, 84365,
14 84365.5 and 84368.3

15 **ALLEGATIONS:**

16 20. On or about October 13, 2012, respondents Families First, Audrie L.
17 Meyer and Gordon Richardson failed to ensure that the personal rights of children in
18 care were protected, and further, failed to ensure that facility staff were competent and
19 properly trained in emergency intervention procedures designed to protect the safety of
20 children. More specifically, Child No. 19 was improperly restrained by two staff persons,
21 Staff No. 1 and No. 2, in violation of the facility's emergency intervention plan and the
22 child's needs and services plan; the child's behavior did not warrant the restraint and
23 the staff failed to utilize non-physical interventions prior to the restraint. As a result,
24 Child No. 19 sustained multiple fractures of his right arm which required emergency
25 medical treatment. Subsequently, because of the severity of the child's injury, surgery
26 was performed to repair the fractures which resulted in two titanium plates and seven
27 screws. Further, respondents failed to report Child No. 19's injury and medical
treatment to the Licensing Agency as required; only the restraint was reported. In
addition, the incident report falsely reported that there were no visible injuries to Child
No. 19. Further, Staff No. 1 initiated a one person restraint earlier in the day with this
same child, in violation of the facility's emergency intervention plan and the child's

1 needs and services plan. [Health & Safety Code §§ 1550(a)-(c) and 1558(a)(1)-(2) &
2 (a)(4); and, CCR §§ 80000(b); 80022(h); 80042(a); 80046(a); 80061(a), (b), (b)(1)(D) &
3 (b)(2)(C); 80063(a); 80065(l); 84061(a), (h), (h)(6)(E) & (H); 84064.4(a); 84065.2(b)(1);
4 84072(c)(13)-(15); 84078(a)-(b); 84300.1(a) & (a)(3); 84361(b); 84365.5(a)-(b);
5 84368.3(a).]

6 A. As a factor in aggravation, Staff No. 2 was on probationary status
7 due to a prior "unjustified restraint" determination by the respondents on or about
8 May 11, 2012, in a separate unrelated incident.

9 **SUBJECT MATTER:** NEEDS AND SERVICES PLAN AND MODIFICATIONS

10 **APPLICABLE LAW:** Health & Safety Code §§ 1550 and 1558

11 CCR §§ 80000, 80042, 80046, 80063, 80065, 84064.4,
12 84068.1, 84068.2, 84068.3 and 84068.4

13 **ALLEGATIONS:**

14 21. During the period between October 13, 2012 and June 6, 2013, and for
15 an unknown period before, the exact dates of which are unknown to complainant at this
16 time, respondent Families First, Audrie L. Meyer and Gordon Richardson failed to
17 review or conduct the necessary reappraisal to modify the children's needs and services
18 plans; failed to assess the compatibility of the children in care and the facility's ability to
19 meet the individual needs of the children at all times; and, further, failed to maintain
20 appropriate and adequate staff to child ratios considering the acuity of the children and
21 their behaviors, in violation of the facility's own Program and its Plan of Operation.
22 There were children in care who were non-compliant with program objectives,
23 constantly AWOL from the facility, engaged other children in care in unsafe behaviors,
24 and required a higher level of care and supervision. In particular, Child No. 13 was
25 AWOL more often than he was at the facility and facility staff was finding it difficult to
26 implement an effective treatment plan for the child. [Health & Safety Code §§ 1550(a)-
27 (c) and 1558(a)(1)-(2) & (a)(4); and, CCR §§ 80000(b); 80022(h); 80042(a); 80046(a);

1 80063(a); 80065(a); 84064.4(a); 84068.1(a) & (b)(3)(A); 84068.2(a) & (c)(1)-(2);
2 84068.3(a)(1)-(3) & (c); and, 84068.4(c).]

3 **SUBJECT MATTER:** REPORTING REQUIREMENTS

4 **APPLICABLE LAW:** Health & Safety Code §§ 1550 and 1558

5 CCR §§ 80000, 80042, 80046, 80061, 80063, 84061 and
6 84064.4

7 **ALLEGATIONS:**

8 22. During the period October 13, 2012 and June 6, 2013, and for an
9 unknown period before or after, the exact dates of which are unknown to complainant,
10 respondent Families First, Audrie L. Meyer and Gordon Richardson failed to ensure
11 incidents regarding child AWOLs, suspected child sexual abuse or physical abuse and
12 other unusual incidents that threaten the children's physical or emotional health or
13 safety were reported, or reported in a timely manner, to the Licensing Agency and/or the
14 children's authorized representatives as required. [Health & Safety Code §§ 1550(a)-(c)
15 and 1558(a)(1)-(2) & (a)(4); and, CCR §§ 80000(b); 80042(a); 80046(a); 80061(a), (b),
16 (b)(1)(E)-(F), & (e); 80063(a); 84061(a), (h) & (h)(7)(A)-(E); and, 84064.4(a)

17 **SUBJECT MATTER:** ACCOUNTABILITY; ADMINISTRATOR QUALIFICATIONS
18 AND DUTIES:

19 **APPLICABLE LAW:** Health & Safety Code §§ 1550 and 1558

20 CCR §§ 80000, 80042, 80046, 80063, 80064, 84064.4 and
21 84064.5

21 **ALLEGATIONS:**

22 23. As indicated by the conduct and conditions alleged in paragraphs 16
23 through 22, above, and incorporated herein by reference, respondent Families First and
24 Gordon Richardson failed or otherwise refused to be accountable for the general
25 supervision of the facility and its operation. [Health & Safety Code § 1550(a)-(c) and
26 CCR §§ 80000(b); 80042 (a); 80063(a)-(b); and, 84063(a) & (a)(5).]

27 //

1 24. As indicated by the conduct and conditions alleged in paragraphs 16
2 through 22, and incorporated herein by reference, respondent Audrie L. Meyer, as the
3 facility administrator and Clinical Director, failed or otherwise refused to provide or
4 ensure the provision of services to children in care; to exhibit knowledge of the
5 requirements for providing care and supervision appropriate to the children, knowledge
6 of and ability to conform to the applicable laws and regulations; to recruit, employ and/or
7 train qualified staff; and, further, failed to competently administer, supervise or manage
8 the facility in compliance with applicable licensing laws and regulations governing the
9 operation of a group home. [Health & Safety Code §§ 1550(a)-(c) and 1558(a)(1)-(2) &
10 (a)(4); and, CCR §§ 80042(a); 80046(a); 80064(a)(2)-(7); 84064(f)(1)-(7); 84064.4(a);
11 and, 84064.5.]

12 SUBJECT MATTER: CONDUCT INIMICAL

13 APPLICABLE LAW: Health & Safety Code §§ 1550 and 1558

14 CCR §§ 80000, 80042, 80046, 84064.4 and 84064.5

15 ALLEGATIONS:

16 25. During the period between January 1, 2012 and June 6, 2013, the exact
17 dates of which are unknown to the complainant, the Davis Police Department received
18 approximately 560 calls for service from the facility. [Health & Safety Code §§ 1550(c)
19 and 1558(a)(2) & (a)(4); and, CCR §§ 80042(a); 80046(a); 84064.4(a); and
20 84064.5(a)(2).]

21 26. Respondent Audrie L. Meyer, individually and/or in her representative
22 capacity, engaged in conduct, and operated the facility in a manner, which is inimical to
23 the health, morals, welfare, or safety of either children in or receiving services from the
24 facility, or the people of the State of California as alleged in paragraphs 16 through 22,
25 24 and 25, above, and incorporated herein by reference. [Health & Safety Code
26 §§ 1550(c) and 1558(a)(2) & (a)(4); and, CCR §§ 80042(a); 80046(a); 84064.4(a); and
27 84064.5(a)(2).]

1 27. Respondents Families First and Gordon Richardson engaged in
2 conduct, and operated the facility in a manner, which is inimical to the health, morals,
3 welfare, or safety of either children in or receiving services from the facility, or the
4 people of the State of California as alleged in paragraphs 16 through 23 and 25, above,
5 and incorporated herein by reference. [Health & Safety Code § 1550(c); and, CCR §§
6 80000(b) and 80042(a).]

7 **CAUSE FOR DISCIPLINE**

8 28. The facts alleged in paragraphs 16 through 27, individually and/or jointly,
9 constitute violations of licensing laws. These facts provide cause, pursuant to Health
10 and Safety Code § 1550(a)-(b) to revoke respondent Families First's license to operate
11 the facility.

12 29. The facts alleged in paragraphs 16 through 23 and 25, individually
13 and/or jointly, constitute conduct by respondent Families First which is inimical to the
14 health, morals, welfare, or safety of either children in, or receiving services from, the
15 facility or the people of the State of California. These facts provide cause, pursuant to
16 Health and Safety Code § 1550(c), to revoke the license to operate the facility.

17 30. The facts alleged in paragraphs 16 through 22 and 24 through 26,
18 individually and/or jointly, constitute grounds pursuant to Health and Safety Code
19 §§ 1558(a)(1) and/or (a)(4) and Title 22, CCR § 80046(a), to prohibit respondent
20 Audrie L. Meyer's employment in, presence in, and contact with clients of, any facility
21 licensed by the Department or certified by a licensed foster family agency and from
22 holding the position of member of the board of directors, executive director, or officer of
23 the licensee of any facility licensed by the Department.

24 31. The facts alleged in paragraphs 16 through 22 and 24 and 25,
25 individually and/or jointly, constitute conduct by respondent Audrie L. Meyer which is
26 inimical to the health, morals, welfare or safety of either children in or receiving services
27 from the facility, or the people of the State of California. These facts provide cause to

1 prohibit respondent Audrie L. Meyer's employment in, presence in, and contact with
2 clients of, any facility licensed by the Department or certified by a licensed foster family
3 agency and from holding the position of member of the board of directors, executive
4 director, or officer of the licensee of any facility licensed by the Department, pursuant to
5 Health and Safety Code § 1558(a)(2).

6 32. The facts alleged in paragraphs 16 through 22, and 24 through 26,
7 individually and/or jointly, also constitute cause, pursuant to Health and Safety Code
8 §§ 1522.41(g)(2), 1550(a)-(c) and Title 22, CCR §§ 84064.4(a)(3) and 84064.5(a)(2), to
9 revoke or consider forfeited respondent Audrie L. Meyer's administrator certificate for
10 group homes as a result of an order excluding respondent Audrie L. Meyer pursuant to
11 Health and Safety Code § 1558.

12 33. The facts alleged in paragraphs 16 through 23, 25 and 27, individually
13 and/or jointly, constitute grounds pursuant to Health and Safety Code § 1558(a)(1)
14 and/or (a)(4) and Title 22, CCR § 80046(a), to prohibit respondent Gordon Richardson's
15 employment in, presence in, and contact with clients of, any facility licensed by the
16 Department or certified by a licensed foster family agency and from holding the position
17 of member of the board of directors, executive director, or officer of the licensee of any
18 facility licensed by the Department.

19 34. The facts alleged in paragraphs 16 through 23 and 25, individually
20 and/or jointly, constitute conduct by respondent Gordon Richardson which is inimical to
21 the health, morals, welfare or safety of either children in or receiving services from the
22 facility, or the people of the State of California. These facts provide cause to prohibit
23 respondent Gordon Richardson's employment in, presence in, and contact with clients
24 of, any facility licensed by the Department or certified by a licensed foster family agency
25 and from holding the position of member of the board of directors, executive director, or
26 officer of the licensee of any facility licensed by the Department, pursuant to Health and
27 Safety Code § 1558(a)(2).

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PETITION FOR RELIEF

35. WHEREFORE, complainant petitions that Respondent **FAMILIES FIRST INC.'S**, license to operate a group home located at 2100 5TH Street, Davis, California be revoked.

36. WHEREFORE, Complainant petitions that the respondent **AUDRIE L. MEYER** be prohibited for the remainder of respondent **AUDRIE L. MEYER'S** life, from employment in, presence in, and from contact with clients of, any facility licensed by the Department or certified by a licensed foster family agency and from holding the position of member of the board of directors, executive director, or officer of the licensee of any facility licensed by the Department.

37. WHEREFORE, Complainant petitions that respondent **AUDRIE L. MEYER'S** administrator's certificate for group homes be revoked or deemed forfeited.

38. WHEREFORE, Complainant petitions that the respondent **GORDON RICHARDSON** be prohibited for the remainder of respondent **GORDON RICHARDSON'S** life, from employment in, presence in, and from contact with clients of, any facility licensed by the Department or certified by a licensed foster family agency and from holding the position of member of the board of directors, executive director, or officer of the licensee of any facility licensed by the Department.

DATED: June 12, 2013


JEFFREY HIRATSUKA
Deputy Director
Community Care Licensing Division
California Department of Social Services