CHRISTOPHER BURKE sr
Natural Father, In Pro Se
Chris Burke, Natural Father. Co Counsel & Pro Se Complainant

BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF SOCIAL SERVICES / CHILD PROTECTIVE SERVICES
DIVISION OF ADMINISTRATIVE AND INTERNAL REVIEWS

IN RE THE INTERESTS OF:
CHRISTOPHER, A Minor Child.

COMPLAINANT:
Chris Burke, Natural Father. Co Counsel & Pro Se Complainant

v.

RESPONDENTS:
CHILD PROTECTIVE SERVICES DIVISION, SUPERVISORY STAFF, AND INDIVIDUAL CASEWORKERS.ANGELICA RODRIGUES, CYNTHIA CAMACHO, Heather, Rachel, Amy, Daniel, and CPS field workers, superintendent Ann Hubbard, principal, Justin in Saint Peter, Alicia Lin Quitty, sheriff Hunter, sheriff Freeman ,Bill Brown. And responded 1 through 20.

CASE NO.: 19FL02003

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(Related Case No.: **23-8198 RAPE)**

Chris Burke, Natural Father. Co Counsel & Pro Se Complainant
Address: Place
Telephone: (Available upon confirmation)
Co Counsel & Pro Se Complainant

BEFORE THE STATE OF CALIFORNIA
DEPARTMENT OF SOCIAL SERVICES / CHILD PROTECTIVE SERVICES
DIVISION OF ADMINISTRATIVE AND INTERNAL REVIEWS

IN RE THE INTERESTS OF:
CHRISTOPHER, A Minor Child.

FORMAL ADMINISTRATIVE COMPLAINT AND DEMAND FOR INVESTIGATION / INJUNCTIVE RELIEF

STATUTORY BASES:
U.S. Const. amend. XIV; 42 U.S.C. § 12132 (ADA Title II); Cal. Fam. Code § 3025; Cal. Welf. & Inst. Code §§ 300, 319, 361.5, 362.1; Cal. Gov. Code § 11135; Cal. Bus. & Prof. Code §§ 2052, 2903; Cal. Penal Code §§ 1347.5, 11164 et seq.

Complainant, the natural father of the minor child Christopher, hereby submits this Formal Administrative Complaint and Demand for Investigation and Injunctive Relief against the designated Child Protective Services ("CPS") local agency, supervisory personnel, and individual caseworkers assigned to this matter, alleging as follows:

STATEMENT OF JURISDICTION AND PARTIES
1. Complainant is the biological and legal father of the minor child, **Christopher,** and possesses established parental and legal custody rights pursuant to valid orders of the California Superior Court.

2. Respondent agency is an administrative unit operating under the laws of the State of California, subject to the jurisdiction of the California Department of Social Services, the Superior Court, and governing state and **federal constitutional and statutory mandates.**

3. At all times relevant herein, **the actions complained of were performed under color of state administrative authority by agency caseworkers and supervisory staff acting within the scope of their assigned employment.**

STATEMENT OF FACTS

4. Pursuant to governing Superior Court orders and a legally binding Co-Parenting Contract, Complainant holds full **legal authority** to jointly participate in **all** major **decisions** impacting the minor child **Christopher**, including educational placement, legal affairs, and healthcare determinations.

5. A separate, temporary adult no-contact protective order exists between the parents. **At no point** has any competent judicial body **modified** or **vacated** Complainant's joint legal custody rights or ordered the **severance** of Father's access to the minor child's records and vital welfare information.

6. The minor child Christopher is an acute survivor actively processing severe sexual abuse and related trauma, requiring specialized, **evidence-based** pediatric trauma intervention.

7. Caseworkers **assigned by Respondent agency** have systematically **weaponized** the coexisting adult protective order as an **unauthorized** pretext to **unilaterally** excise Complainant from all casework, status reviews, medical updates, and administrative deliberations concerning Christopher.

8. Furthermore, an **unlicensed CPS** caseworker **scheduled**, **isolated,** and **conducted private diagnostic sessions** with Christopher to **perform unauthorized clinical assessments, reach psychological diagnostic conclusions**, and **institute an unapproved, contraindicated behavioral treatment regimen.**

9. Respondent agency and its agents **concealed** these clinical interventions, evaluations, and placement shifts from Complainant, the Juvenile Dependency Court, and appropriate investigating law enforcement authorities.

COUNT I

UNLAWFUL EXCLUSION OF FATHER FROM MINOR **CHILD'S LIFE**, VIOLATION OF CO-PARENTING CONTRACT, AND COEXISTING COURT ORDERS

(Cal. Fam. Code § 3025; Cal. Welf. & Inst. Code § 362.1; Cal. Gov. Code § 11135; ADA Title II [42 U.S.C. § 12132]; Cal. Penal Code § 1347.5)

10. Complainant incorporates paragraphs 1 through 9 by reference as though fully set forth herein.

11. Under California Family Code § 3025, access to records and information pertaining to a minor child—including medical, dental, and school records—shall not be denied to a parent simply because that parent is not the child's custodial parent, nor does an adult restraining order extinguish **statutory record rights** unless specifically so ordered by the court.

12. California Welfare & Institutions Code § 362.1 strictly **mandates that any agency intervention maintain the parent-child relationship** and provide **consistent** parental involvement unless detrimental to the safety of the minor as adjudicated by a **judicial officer**.

13. The **coexisting temporary protective order** between adult parties **does not legally abrogate** the agency's affirmative obligations under California law or the governing Co-Parenting Contract. Facilitation of joint decision-making, administrative disclosures, and required notifications regarding Christopher **do not** constitute contact with the protected adult party.

14. Respondent agency, by utilizing the protective order as a **pretextual bar**, has **systematically stripped**

Complainant of parental rights without due process, in violation of California Government Code § 11135 and Title II of the Americans with Disabilities Act (42 U.S.C. § 12132), thereby d**enying Complainant equal** access to administrative proceedings and child welfare oversight.

COUNT II

UNLAWFUL AND CRIMINAL PRACTICE OF MEDICINE AND PSYCHOLOGY WITHOUT A LICENSE & IMPROPER CLINICAL INTERVENTION DURING ACTIVE TRAUMA

(Cal. Bus. & Prof. Code §§ 2052, 2903; Cal. Penal Code § 11164 et seq.)

15. Complainant incorporates paragraphs 1 through 14 by reference as though fully set forth herein.

16. California Business and Professions Code § 2052 establishes that any person who practices, attempts to practice, or advertises or holds themselves out as **practicing any system or mode of treating** the sick or afflicted, or who **diagnoses, treats,** operates for, or **prescribes for any mental or physical condition without a valid license** is **guilty** of a public offense.

17. California Business and Professions Code § 2903 prohibits the **unlicensed practice of psychology**, specifically defining the application of **psychological principles and methods to diagnose, treat, or ameliorate psychological disorders** as the exclusive purview of licensed professionals.

18. Respondent's **caseworker, lacking doctoral clinical licensure, medical credentials, or independent board certification, orchestrated private clinical encounters with Christopher during active trauma processing.**

19. Said caseworker **purported to clinically evaluate, diagnose complex post-traumatic presentations, and impose a treatment paradigm upon the child without** clinical

authority, diagnostic **validity,** or **required parental consent.**

20. This **unlawful intervention** directly subverted statutory child protection structures set forth in California **Penal Code § 11164 et seq.**, **inflicting severe harm and psychological destabilization upon the child through unauthorized, contraindicated clinical practices.**

COUNT III

ULTRA VIRES TRIBUNAL ARROGATION, SUPPRESSION OF EVIDENCE FROM COURT/POLICE, AND **UNLAWFUL SEPARATION OF CHILD** FROM PRIMARY SUPPORT SYSTEM

(U.S. Const. amend. XIV; Cal. Welf. & Inst. Code §§ 300, 319, 361.5; Cal. Penal Code § 1347.5)

21. Complainant incorporates paragraphs 1 through 20 by reference as though fully set forth herein.

22. The Fourteenth Amendment to the United States Constitution guarantees that **no State shall deprive any person of liberty without due process of law.** The fundamental liberty interest of **natural parents in the care, custody, and management of their children** is deeply rooted and protected from **arbitrary administrative disruption.**

23. Respondent agency is an administrative entity **devoid of judicial power.** Under California Welfare & Institutions Code §§ 300, 319, and 361.5, **only** the California **Superior Court** possesses the **authority** to limit **parental custody,** confirm dependency, modify legal rights, or **sever an established parent-child bond.**

24. Respondent arrogated judicial functions unto itself by unilaterally excluding Complainant from his son's acute trauma management, clinical planning, and educational placement without securing judicial authorization.

25. Respondent purposefully withheld critical diagnostic notes, child disclosures, and clinical assessments from Complainant, the Juvenile Dependency Court, and law enforcement investigators, violating California **Penal Code § 1347.5** and constituting an ultra vires cover-up of material child welfare information.

PRAYER FOR RELIEF

WHEREFORE, Complainant respectfully demands the following urgent administrative and injunctive remedies:

1. IMMEDIATE CEASE-AND-DESIST ORDER:
Directing the immediate cessation of all unlicensed diagnostic, psychological, and therapeutic interventions by non-clinician caseworkers regarding Christopher;

2. CASE REASSIGNMENT AND FORMAL INVESTIGATION: The immediate removal and reassignment of the current caseworkers and direct supervisors, accompanied by a formal, independent internal affairs and administrative investigation into ultra vires clinical misconduct;

3. MANDATORY STATUTORY DISCLOSURE: Full, unredacted production and immediate delivery to Complainant of all agency files, psychological notes, diagnostic assessments, inter-agency communications, and incident logs concerning Christopher pursuant to California Family Code § 3025;

4. ADA TITLE II REASONABLE ACCOMMODATIONS: Immediate implementation of structured administrative protocols ensuring Complainant's full, **equal participation** in all future case conferences, decisions, and disclosures in compliance with **Title II of the Americans with Disabilities Act;**

5. JUDICIAL NOTIFICATION: Formal administrative transmittal of this Complaint and all withheld records to the presiding judge of the California Superior Court, Juvenile Division, having jurisdiction over the minor child.

Dated:11/2/2026 10:00AM

Respectfully submitted,

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By: Chris burke

Natural Father, Co Counsel & Pro Se Complainant

VERIFICATION

I, Person, declare under penalty of perjury under the laws of the State of California that I am the Complainant and natural father in the above-entitled administrative proceeding; that I have read the foregoing Formal Administrative Complaint and know the contents thereof; and that the matters stated therein are true of my own knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true.

Executed on Date, in the State of California.

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Person, Declarant / Complainant