Reed H. Gaddie
152 W. 10th Drive
Mesa, Arizona 85210
(480) 644-7930

Representative for John Hancock Academy, Inc.

STATE OF ARIZONA

OFFICE OF ADMINISTRATIVE HEARINGS

In the matter of: JOHN HANCOCK ACADEMY, INC. (an Arizona non-profit corporation), Applicant	No. 13F-AP-001-BCS **MOTION TO EXCLUDE/SUPPRESS EVIDENCE UNDER ARS 41 1092.07.D RULES OF THE ARIZONA SUPREME COURT**

MOTION TO SUPPRESS/EXCLUDE EVIDENCE

Now comes the Applicant In consideration of ARS § 41-1092 D. Motions to Suppress or exclude certain evidence due to certain evidence listed by the Board counsel has a probative value greatly outweighed by danger of unfair prejudice and will subject the applicant to severe harassment and undue embarrassment..

Reason: The Applicant states that he is an authorized representative of John Hancock Academy Inc. who applied for a charter with the Az State Board for Charter Schools and that he has come before the Honorable Judge at the request of his aging mother (recognized state wide and nationally as a high quality school owner and charter school operator for the past 35 years and was responsible for providing approximately 20,000 students a quality education.) She has requested her son to assist her in final completion of her career and desires to return home to her hometown where she operated a private school in the 1970's with the same name. She has

informed the Board that an entire community of her former students from the 1970's have grown and have families and they want their children to have the same high quality education experience they had.

Unfortunately, the destructive, defaming, and destructive allegations which will be posed as evidence will destroy the hope and joy of these hundreds of families looking forward to her return and opening a charter school with the same name for their children and grandchildren and the hope of a son desiring to honor his parents by assisting them to accomplish their last hope and desire which is to serve these hundreds of families by opening a charter school and having a dedication at its flagpole commemorating their 35 year contribution to education in this state.

Their son also desires to fulfill his duty as a father to his three young daughters by passing on the legacy of their grandparents by making it possible someday to attend their Daddy and Mother's school where the traditional high quality refined and proven education model program will provide them the highest quality academic education experience that their father received when he attended his parents school back in the 1970's.

Unfortunately this will not ever happen because her son operated a school 15 years ago for 4 months then was closed. There are many documents which the opposing party is preparing to use as evidence which is very defaming and destructive unless someone takes the time to review and consider all of the evidence which the opposing party has neither read or seen, therefore, they made a decision on some rumors, half truth innuendos which still need to be considered before the Honorable Hearing or it would be a blessing to countless lives and a mother and a son if the Honorable Judge would decide that this charter is not her son's charter application, it is his mother's and she has been operating an "A" and "Excelling" rated charter school named Happy Valley School for over 12 years flawlessly and they denied this charter because of what her son did 15 years ago. It would make a whole community and a family very happy if the Judge would grant this motion.

The applicant respectfully requests that the Honorable Judge order the Assistant Attorney General not to mention, refer to or attempt to elict in any manner any evidence of Reed Gaddie operating any charter school previously mentioned herein. This will include witnesses in the Hearing in the presence of the Judge Sondra J. Vanella..

The applicant humbly exercises his right to request suppression and/or exclusion of all evidence involving a school named Arizona Vocational Training/Arizona Career and Technology.in fear the probative value is greatly outweighed by the danger of unfair prejudice.

Wherefore, Premises considered, it is respectfully requested the Honorable Judge order the Assistant Attorney General Kim Anderson and/or any other counsel representing the Board not to mention or allude or present, discuss, question any witness or make any statements involving the applicant Reed Gaddie operating the school mentioned herein.

Respectfully submitted,

_____

Reed Gaddie - Authorized Representative of John Hancock Academy

152 West Tenth Drive

Mesa, Arizona 85210

480-644-7930

Copy of the foregoing Motion mailed this 28 day of April 2013 to:

DeAnne Rowe

Executive Director

Arizona State Board for Charter Schools

P.O. Box 18328

Phoenixd, AZ. 85009

Esq. Kim S. Anderson/#010548

Assistant Attorney General

1275 West Washington Street

Phoenix, Arizona 85007

(602) 364-0402

Email: EducationHealth@azag.gov

Honorable Judge Sondra J. Vanella

Office of Administrative Hearings

1400 West Washington Suite 101

Phoenix, Arizona 85007

(602) 542 - 9826

By _____

Reed H. Gaddie

Authorized Representative of John Hancock Academy

In the matter of: JOHN HANCOCK ACADEMY INC. (an Arizona non-profit corporation), Applicant	No. 13F-AP-001-BCS **MOTION FOR INFORMAL HEARING UNDER HEARINGS ARS 41-1092.07.F.1.**

MOTION FOR INFORMAL HEARING

Now comes the Applicant in consideration of ARS § 41-1092.07.F.1.wherein a hearing may be conducted in an informal manner and without adherence to the rules of evidence required in judicial proceedings.

The Applicant being limited in experience in law makes this request for that purpose so that the evidence the applicant has to present may be considered in a manner they are familiar with.

The Applicant expresses their appreciation for granting this request.

Reed Gaddis-Authorized Representative of John Hancock Academy

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Mesa, Arizona 85210

480-644-7930

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Representative for John Hancock Academy, Inc.

STATE OF ARIZONA

OFFICE OF ADMINISTRATIVE HEARINGS

In the matter of: JOHN HANCOCK ACADEMY, INC. (an Arizona non-profit corporation), Applicant	No. 13F-AP-001-BCS **ORDER MOTION FOR INFORMAL HEARING ARS 41-1092.07.F1 OF THE RULES OF THE ARIZONA SUPREME COURT**

ORDER ON MOTION FOR INFORMAL HEARING

Upon the foregoing Applicant's Motion For an Informal Hearing is hereby

ORDERED that said Motion is in all things **GRANTED** as to ARS -1092.07.F.1 and it is further

ORDERED that the Assistant Attorney General conduct this Hearing without adherence to the Rules of Evidence required bin judicial proceedings.it is also ordered that **ORDERED** that the attorney for the State instruct his witnesses to do the same. as so ORDERED This 28th day of April 2013

_____

Honorable Judge Sondra J Vanella

Copy of the foregoing Motion mailed this ____day of April 2013 to:

Copy of the foregoing Motion mailed this 29 day of April 2013 to:

DeAnne Rowe

Executive Director

Arizona State Board for Charter Schools

P.O. Box 18328

Phoenixd, AZ. 85009

Esq. Kim S. Anderson/#010548

Assistant Attorney General

1275 West Washington Street

Phoenix, Arizona 85007

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Honorable Judge Sondra J. Vanella

Office of Administrative Hearings

1400 West Washington Suite 101

Phoenix, Arizona 85007

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By _____

Reed H. Gaddie

Authorized Representative of John Hancock Academy