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Representative for John Hancock Academy, Inc.

STATE OF ARIZONA
OFFICE OF ADMINISTRATIVE HEARINGS
HONORABLE JUDGE SONDRA J. VANELLA

In the matter of: ARIZONA STATE BOARD FOR CHARTER SCHOOLS (Board)	No. 13F-AP-001-BCS JOHN HANCOCK ACADEMY INC(Applicant) **LIST OF WITNESSES AND EXHIBITS**

Pursuant to the Prehearing Order dated April 6, 2013, undersigned representative for John Hancock Academy files this list of Witnesses and Exhibits.

I. Witnesses, Description of Relevance, Cross Examination Questions:

1 - Steve Sarmento - Cross examination crdibility

2 - Mark Francis Director of DOE Charter Schools Program (CSP) No Gaddie will ever open another school - Witness to prove bias

3 - Bob Brown teleconference witness to prove bias

4 - James Hamlin - Construction Worker in 1997 who saw individuals remove ACT's attendance data card files altered them then blamed Reed as an attempt cover up. [Note: This individual was present when Reed Gaddie reported the forced entry when the employee files, fingerprint cards,

computers and other equipment were stolen from the administration office when Reed reported this burglary to the Mesa Police (Mesa Police Report # 19980761016)]

3 - DeAnna Rowe - Cross examine, -

II. List of Numbered Exhibits (See # on upper right hand corner of documents)

Exhibits	Document #	Description/Relevance/Comment
Exhibit 1		
	1.1	Charter Ed. Philosophy
	1.2	Continued
	1.3	Continued
	1.4	Continued
Exhibit 2		
	2.1	Applicant Organization
	2.2	continued
	2.3	Organizational Chart
Exhibit 3		
	3.1	Delite Gaddie involvement with JHA Governance
	3.2	Continued
Exhibit 3		
	3.3	Continued

3.4	Delite Gaddie Resume	
3.5	Sequoia Construction 600 students 1996	
3.6	Noah Webster family groundbreaking	
3.7	Construction ACT-350 students Noah 600	
3.8	Noah groundbreaking	
3.5	Noah/ACT construction	
3.7	Noah/ACT construction	
3.8	Noah/ACT completion	
3.9	Noah/ACT completion	

EXHIBIT 4-Reed Gaddie (Evidence of Education, career and demonstrated skills)

4.1	Reed Gaddie Profile
4.2	Reed Gaddie Profile
4.3	Descript.of Reed's career in JHA application
4.4	Descript.of Reed's career in JHA application
4.5	Descript.of Reed's career in JHA application
4.6	H.S. Diploma
4.7	MSTI Graduate Certiicate
4.8	Ferris State Univ. Cerificate
4.9	National Assessment Institute Bus.Mgmt
4.10	Leviton Transient Voltage Surge Supp.
4.11	RSES Carrier Certificate
4.12	RSES Troubleshooting

Exhibit 4 (continued)- Evidence of Reed's Professional Development and Mastery of teaching and school administration at Mountain States Technical Institute (MSTI)

4.13	MSTI Facility Photo
4.14	Reed's leadership/teaching MSTI
4.15	Reed's ability to maintain school compliance with the Accrediting Commission-National Association of Trade and Technical Schools
4.16	NATTS letter verifying Reed & his faculty participation in NATTS Teacher/Curriculum development Training modules
4.17	NATTS Certificate Professional Achievement
4.18	Reed is complemented by **NATTS visiting team assessment and is evidence Reed has the skills, knowledge and ability to maintain a school's compliance which is opposite of what the Board accused Reed of in their letter of Denial**

Exhibt 4 (continued) Evidence of Reed's mastery of curriculum development

4.19	Educator of the Year Award
4.20	State Board approves Reed's curriculum and licenses MSTI to offer a new higher degree
4.21	State Board License
4.22	Tech Talk

4.23	Reed's course reaches national news
4.24	Reed's course reaches national news
4.25	True evidence of Reed's mastery of teaching/school leadership skills
4.26	Reed granting achievement awards to his students
4.27	Photo of Reed and student
4.28	Sample of graduates from MSTI
4.29	Letter from employer of Reed's graduate

Exhibit 4 - **Evidence of Reed's mastery of teaching and results**

4.30	Letter from employer of Reed's graduate
4.31	**Graduation ceremony where Reed received a standing ovation from staff, faculty and graduates**
4.32	**ASU letter of appreciation and recommendation**

EXHIBIT 5 Evidenced of what actually happened at Arizona Vocational Training (AVT) or Arizona Career and Technology (ACT) (Did all the stakeholders do their duty and follow the rules here?)

5.1	Letter of Resignation (Reed's partner abandon's)
5.2	Personal Guarantee **(How much would you sacrifice for the education of the youth in your community? Reed sacrificed $26,298.00/month!!! Because he believes in the**

youth of our state and backed his opinion up with everything he had but was deprived of the chance to prove it.

5.3 Evidence of $53,000 vanishes from ACT's payroll account in thin air not even the Bank could explain (More on this issue below) (Sept 1997)

5.4 Notorized Affidavit of witness who saw who stole ACT's attendance data sheets, who altered them then blamed Reed for it

Exhibit 5 (continued) Evidence of Reed Gaddie's administrative skills

5.8 EES - ACT contract 11.04/1997

(When Reed learned he had been accused he showed admirable leadership and problem solving by reporting the problem then he solved the problem by immediately contracting a reputable outside attendance reporting contractor (EES). EES who was trusted by the DOE finance unit. This decision proved ACT had not over-reported and his integrity remained.)

5.9 WRUSD site visit report

ACT's sponsor drops by uninvited and discovers the school is not operating as alleged. Instead, WRUSD representative observed learning was taking

place, and though difficult, student head count seemed to match as reported and computer lab was well organized and utilized.(Report is on WRUSD letterhead.)

[#**Now wait a minute** - this counter-evidence challenges the credibility of the statements made by witnesses at the hearing. They testified that ACT's ***campus had bare wires hanging out of the walls, body holes in the classroom walls, torn off fire alarms and entire campus in disarray.*** Nevertheless, if any of those allegations had been true, they would have been reported on this report. **This evidence suggests academic education is occurring in ACT's classrooms, ACT has organized and orderly classrooms , student culture and environment for learning is exceptional, the staff member also mentioned that school lunch was going on so it must be safe to assume school had lunches. Obviously ACT had of a well- organized and utilized computer lab. A second witness to heads counted on ACT's campus. 11/12/1997].**

5.10 **EES 40 day ADM report** and submits it directly to WRUSD and the state finance unit at OE.

5.11 **EES 40 day ADM report** EES produces 40 day report and submits it directly to WRUSD and the state finance unit at DOE. 12/5/1997

Exhibit 5 (continued)

WRUSD was required by law to release AVT's funds when they received verification of ACT's 40 day ADM report from EES on this date due to ACT was in compliance with ADM recording and reporting December 5, 1997

5.12 **Notice of decision to revoke charter without a hearing?**

[What rules, policies and procedures did WRUSD violate in this document?

5.12a	WRUSD Board made the decision without holding a hearing.
5.12b	Pay close attention to the last paragraph. It seems WRUSD contracted earlier so they could charge a fee for chartering the schools but over the summer, the Legislature passed a law which prevented them from charging a fee so, it appears they want to walk out of their contract. If they withhold funds, they get to keep them?

Ms. Rowe, would you feel if this happened to you? does this document describe the proper legal procedure for how to revoke a charter? Do you agree they violated state law because they have already made a decision without giving proper notice and a hearing prior to the decision? Remember they have not waited the 90 days yet prior to making that decision and most of all, pay close attention to the last paragraph. Remember that the state legislature had just one month after WRUSD chartered schools the legislature prevented them from collecting fees. This meant all those 15 years charters they wanted to shut down ASAP. (motive) (Dec. 11,1997]

5.13	WRUSD letter to parents - was this legal?
5.14	**ACT last funding** deposit (which was $180,000 short (ACT's death warrant - we were 180,000 short of payroll, the staff and faculty walked out, rebelled.)
5.15	***$53,000 Deposit Recovered*** (Evidence that the funds had in fact been transferred to ACT's corrupt governing board member's wife's business account.

Finally, Reed's Business office manager and Bank President found the missing $53,000 out the problem was it was transferred to ACT's governing board member's wife's account. His wife was Reed's sister.

This event caused great rivalry and divided the family for which we still have not recovered. Reed's sister divorced him after this. Reed filed an Injunction for Harassment and it was granted. A year later, a former student from the Navajo Nation called Reed, and told him that when his family opened two schools, this caused almost 1200 students to withdraw from the district. Many teachers lost their jobs, filed for unemployment pensions from the union. This put a great drain on the pension funds so the union officials appointed an member to use his influence to oust the Superintendent of WRUSD out of his job and occupy the vacant position then take ACT down before the 100th day with intent to withhold (embezzle) 100% of the funding ACT was entitled to receive and no matter what Reed had done, they were not going to let the school reopen. They publicly blamed Reed at the hearing and the press as a cover up to throw off investigators. Reed had never spoken with the State Auditor General special investigations unit ever since after reporting this. He was instructed not to divulge any information further. Thus, Reed has never been charged, arrested, prosecuted, convicted from any state agency neither has he been disciplined. He is very familiar with corruption both within and out of our school governance.

5.16` Reed Files an Injunction for Harrassment

Exhibit 6 - Evidence which disproves the testimonies of witnesses at the Hearing and proves ACT was in fact in compliance

6.1 Occupancy Permit

6.2 Fire Marshall Green Tag

6.3 Occupancy Permit

6.4 Proof of compliance with reduced lunch

6.5 Immunizations report sample

6.6 Bus Driver proof licenses and certificates

6.7 Proof of School Insurance

6.8 Proof of Special Ed Services

6.9 Proof of Special Ed Services

6.10 Proof of Special Ed Services

6.11 Proof of Special Ed Services

6.12 Proof of financial audit compliance

EXHIBIT 7 What did ACT's parents and local community have to say about ACT?

7.1 US Dept. of Labor Bureau of Apprenticeship

7.2 Az DOT 2+2 program (See parent letter)

7.3 **Ottawa University letter**

7.4 Parent letter

7.5 Parent letter

7.6 Parent letter

7.7 Parent letter

7.8 Parent Letter

7.9 Parent letter

Now, the time has come to ask if Reed sought legal counsel, did legal actions occur or are there any legal letters and/or opinions? Yes, and they speak for themselves and are Reed's opinion also and Kim, I believe all the points and arguments here are sufficient but I have another from Esq. Brandon Lane who claimed the losses of $20,000,000 were suffered but the arguments are the same as these presented so, just to make sure it is possible for an abuse of power to occur, it happened then.

EXHIBIT 8 LEGAL ACTION, LETTERS AND LEGAL OPINIONS w points and authotities

This letter was ACT's response to WRUSD unlawful attempt to cover up the crime of the century and blame it all on Reed. It is the oldest war tactic move in the book-

8.1-8.5 Letter from Esq. Gregory Miles P.C.

EXHIBIT 9 ACT Lawsuit filed against WRUSD

9.1 - 9.12 Case #CV98-929997 Robert Vuchrevich Chapter 7 Trustee of Arizona Vocational Training LLC (AVT) v. Window Rock Unified District (WRUSD)

EXHIBIT 10 So, if ACT's charter was never revoked legally, then what was the reason that the State school officials reported on public record?

10.1 - 10.3 National Center for Education Reform Reasons for Closed Charter Schools by the State

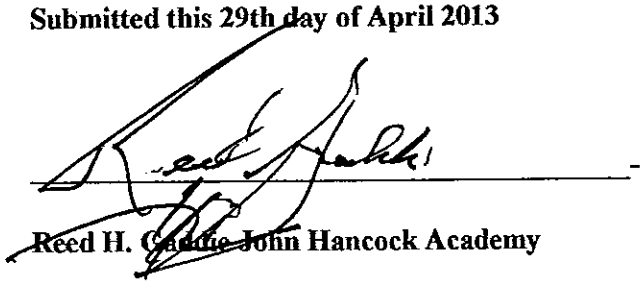
Kim, you can check the validity of this source by having DeAnna check hers. Her school is listed here too. I think she knows this but I know she will not deny the source is valid.

After humbly accepting responsibility for my actions and those of my team, I told Ms. Keegan I could not accept the responsibility for ACT's corrupt governing board member, WRUSD superintendent, and any state officials who may have been deceived or what the press reported but I did ask for her forgiveness. She read all the evidence presented here then responded below

EXHIBIT `11 11.1 - Email from Ms. Lisa Graham Keegan after reviewing this evidence

EXHIBIT 12	**12.1 - 12.2**	**Board Notice of Denial**
EXHIBIT 13	**13.1**	**Ms. Rowes portfolio of JHA's charter**
EXHIBIT 14	**14.1**	**Board Academic Expectation Framework Book pg 20**
EXHIBIT 15	**15.1-15.3**	**DeAnna Rowe's statements in DC 2011**

Submitted this 29th day of April 2013



Reed H. Gaddie John Hancock Academy

Copy of the foregoing Motion mailed this 26 day of April 2013 to:

DeAnne Rowe

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