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STATE OF ALASKA

ALASKA POLICE STANDARDS COUNCIL

In the Matter of)	
)	
Roger N. Moore)	No. APSC 98-02
)	
Respondent.)	
<hr/>		

AFFIDAVIT OF LADDIE SHAW

Laddie Shaw, being first duly sworn upon oath, here deposes and states that:

A. I am employed as the Administrator for the Alaska Police Standards Council (hereafter: Council).

B. As the Administrator, my duties include the investigation of allegations and, when appropriate the filing of accusations, which may result in the revocation of police certificates.

C. I have conducted an investigation into the matter of Roger N. Moore. Based upon the results of that investigation, and upon documents and records contained in council files, it is my information and belief that:

1: On or about September 30, 1996, the respondent was hired as a police officer for the Anchorage Police Department.

2: On or about September 11, 1997, the respondent submitted an application to the Alaska Police Standards Council (APSC) for a police officer certificate.

3: On or about September 23, 1997, the respondent was certified as a police officer in the State of Alaska.

4: On or about May 29, 1998, the respondent was selected for a random drug test. The sample was found to contain an active ingredient used to mask the detection of drugs in urine samples. A Medical Review Officer requested an explanation for the presence of the ingredient and did not receive a satisfactory explanation from the respondent.

5: On or about June 18, 1998, an APD internal investigation was requested in concern of the respondent's adulterated drug test. A polygraph examination was

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Alaska Police Standards Council
Box 111200
Juneau, Alaska 99811-1200*

1 administered to the respondent and respondent was shown to be deceptive to questions
2 regarding the drug test.

3
4 6: On or about June 22, 1998, the respondent resigned in lieu of termination
5 from the Anchorage Police Department.

6 7: On July 15, 1998, the respondent admitted that he had lied regarding the
7 use of a masking agent during his drug test.

8 8: On or about September 25, 1998, the Anchorage Police Department
9 recommended decertification based on issues of dishonesty after hire as a police
10 officer.

11 D. On December 22, 1998, I sent to the respondent by U.S. Mail, return
12 receipt requested, documents consisting of an Accusation, Statutes of the Alaska Police
13 Standards Council, Regulations of the Alaska Police Standards Council, the
14 Administrative Procedures Act, and a Notice of Defense. The Accusation contained the
15 allegations shown as numbered paragraphs 1-8 above.

16 E. On January 6, 1999, a United States Postal Service "Return Receipt"
17 signed with the name "Roger N. Moore" and dated 1/2/99 was received by the council.
18 A copy of the return receipt is attached to this affidavit.

19 F. The Notice of Defense sent to the respondent contains instructions that
20 that the Notice must be filed within 15 days of receipt.

21 G. The 15-day period during which respondent could have filed a Notice of
22 Defense expired on January 17, 1999. As of the date of this affidavit no Notice of
23 Defense has been received from the respondent.

24 H. I conclude that the conduct described in numbered paragraphs 1 through
25 8 demonstrates that the respondent lacks good moral character to meet the
26 qualification's as a police officer in the state of Alaska, and that respondent resigned
27 from his employment as a police officer in lieu of being discharged. Respondent
28 therefore does not meet the minimum standards for a certified police officer established
29 under AS 18.65.240(a)(2), and (c), 13 AAC 85.110 (a) (3), and 13 AAC 85.110 (b) (3),
and his police officer certificate should be revoked.

30
31 Further your affiant sayeth naught.

32

Laddie Shaw, Administrator
Alaska Police Standards Council

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Subscribed and sworn before me this 10th day of August, 1999.

Wicky L. Hesse
Notary Public in the State of Alaska

My Commission Expires 3-14-2002

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ALASKA POLICE STANDARDS COUNCIL

*appears this is
actually the
accusation.*

In the Matter of)
)
Roger N. Moore) No. APSC 98-02
)
Respondent.)
)

AFFIDAVIT OF LADDIE SHAW

Laddie Shaw, being first duly sworn upon oath, here deposes and states that:

A: I am employed as the Administrator for the Alaska Police Standards Council (hereafter: Council).

B: As the Administrator, my duties include the investigation of allegations and, when appropriate, the filing of accusations which may result in the revocation of police certificates.

C: I have conducted an investigation into the matter of Roger N. Moore. Based upon the results of that investigation, and upon documents and records contained in council files, the Council moves to revoke the certificate of Roger N. Moore, as a police officer pursuant to AS 18.65.240 (a) (2), AS 18.65.240 (c), AS 18.65.270, AS 44.62.330 et. seq., 13 AAC 85.110 (a) (3) and 13 AAC 85.110 (b) (3).

The Administrator alleges as follows:

1: On or about September 30, 1996, the respondent was hired as a police officer for the Anchorage Police Department.

2: On or about September 11, 1997, the respondent submitted an application to the Alaska Police Standards Council (APSC) for a police officer certificate.

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3: On or about September 23, 1997, the respondent was certified as a police officer in the State of Alaska.

4: On or about May 29, 1998, the respondent was selected for a random drug test. The sample was found to contain an active ingredient used to mask the detection of drugs in urine samples. A Medical Review Officer requested an explanation for the presence of the ingredient and did not receive a satisfactory explanation from the respondent.

5: On or about June 18, 1998, an APD internal investigation was requested in concern of the respondents adulterated drug test. A polygraph examination was administered to the respondent and respondent was shown to be deceptive to questions regarding the drug test.

6: On or about June 22, 1998, the respondent resigned in lieu of termination from the Anchorage Police Department.

7: On or about September 25, 1998, the Anchorage Police Department recommended decertification based on issues of dishonesty and use of a controlled substance after hire as a police officer.

COUNT I

8: Paragraphs 1-8 are incorporated by reference as though set forth in detail. On or about June 22, 1998, the respondent resigned in lieu of termination for cause relating to dishonesty and misconduct from employment as a police officer in Alaska; and therefore, his police officer certificate should be revoked under AS 18. 65. 240 (a) (2) and (c) and 13 AAC 85. 110 (b) (3).

COUNT II

9: Paragraphs 1-9 are incorporated by reference as though set forth in detail. I conclude that the conduct described in numbered paragraphs 1 through 9 demonstrates that the respondent lacks good moral character to meet the qualification's as a police officer in the state of Alaska, and that respondent resigned from his

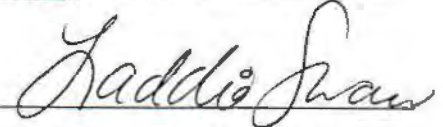
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employment as a police officer in lieu of being discharged. Respondent therefore does not meet the minimum standards for a certified police officer established under AS 18.65.240 (a) (2), and (c), 13 AAC 85.010 (a) (3), and 13 AAC 85.110 (b) (3), and his police officer certificate should be revoked.

WHEREFORE, the Administrator prays that Roger N. Moore's certificate as a police officer in the State of Alaska be revoked.

DATED this 22 day of December 1998, at Juneau, Alaska.


Laddie Shaw, Administrator
Alaska Police Standards Council