

STATE OF ALASKA

ALASKA POLICE STANDARDS COUNCIL

In the Matter of)	
)	
Seri S. Mohm)	No. APSC 98-04
)	
Respondent.)	
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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 Seri S. Mohm. 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 January 29, 1996, the respondent was hired as a police officer for the North Slope Borough Department of Public Safety.

2. On or about February 14, 1997, the respondent submitted an application to the Alaska Police Standards Council (APSC) for a police officer certificate.

3. On or about April 10, 1997, the respondent was certified as a police officer in the State of Alaska.

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

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4. On or about April 25 - May 9, 1998, while assigned to the Public Safety Training Academy as a TAC officer, the respondent accessed sexually explicit sites on the Academy computer.

5. On or about July 17, 1998, an internal investigation was initiated by the North Slope Borough Police Department regarding the access of sexually explicit sites on the Internet by the respondent from state and North Slope Borough computers.

6. On or about July 30, 1998, the respondent was ordered to undergo a Computer Voice Stress Analysis (CVSA). The CVSA was administered and respondent was found to be deceptive in responses to specific questions regarding access of sexually explicit materials on the State Trooper Academy computer.

7. On or about August 5, 1998, respondent admitted to Sgt. Jon Owens that he had lied during his initial interview with Sgt. Owens on July 28, 1998.

8. On or about August 7, 1998, respondent resigned in lieu of termination from the North Slope Borough Police Department.

9. On or about August 10, 1998, the respondent was recommended for de-certification, by the North Slope Borough Police Department.

D: On January 12, 1999, I sent to the respondent by U.S. Mail, return receipt requested, documents consisting of an Accusation, Statutes and Regulations of the Alaska Police Standards Council, the Administrative Act, and a Notice of Defense. The Accusation contained the allegations shown as numbered paragraphs 1-9 above.

E: On February 5, 1999, a U.S. Postal Service "Return Receipt" signed with the name "Seri Mohm" and postmarked 03 Feb. 1999 was received by the council. A copy of the return receipt is attached to this affidavit.

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

1 G: The 15 day period during which the respondent could have filed a
2 Notice of Defense expired on February 18, 1999. As of the date of this affidavit no
3 Notice of Defense has been received from the respondent.
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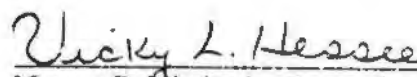
5 H: I conclude that the conduct described in numbered paragraphs 1-9
6 demonstrates that the respondent lacks good moral character to meet the qualification's
7 as a police officer in the state of Alaska, and that the respondent resigned in lieu of
8 termination for cause relating to misconduct or dishonesty, from employment as a
9 police officer in the state of Alaska. Respondent therefore does not meet the minimum
10 standards for a certified police officer established under AS 18. 65. 240 (a) (2) and (c)
11 and 13 AAC 85. 110 (b) (3), and therefore, his police officer certificate should be
12 revoked.
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15 Further your affiant sayeth naught.
16

17 

18 Laddie Shaw, Administrator
19 Alaska Police Standards Council
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22 Subscribed and sworn before me this 10th day of August, 1999.
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25 Notary Public in the State of Alaska
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28 My Commission Expires 3-14-2002
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2 STATE OF ALASKA
3 ALASKA POLICE STANDARDS COUNCIL
4

5 In the Matter of)
6)
7 Seri S. Mohm) No. APSC 98-04
8)
9 Respondent.)
_____)

10
11 ACCUSATION
12

13
14 Laddie Shaw, being first duly sworn upon oath, here deposes and states that:
15

16 A: I am employed as the Administrator for the Alaska Police Standards
17 Council (hereafter: Council).
18

19 B: As the Administrator, my duties include the investigation of allegations
20 and, when appropriate, the filing of accusations which may result in the revocation of
21 police certificates.
22

23 C: I have conducted an investigation into the matter of Seri S. Mohm.
24 Based upon the results of that investigation, and upon documents and records contained
25 in council files, the Council moves to revoke the certificate of Seri S. Mohm, as a
26 police officer pursuant to AS 18.65.240 (a) (2) and (c), AS 18.65.270. AS 44.62.330
27 et. seq., 13 AAC 85. 110 (b) (3).
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31 The Administrator alleges as follows:
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1. On or about January 29, 1996, the respondent was hired as a police
officer for the North Slope Borough Department of Public Safety.

2. On or about February 14, 1997, the respondent submitted an application
to the Alaska Police Standards Council (APSC) for a police officer certificate.

1
2 3. On or about April 10, 1997, the respondent was certified as a police
3 officer in the State of Alaska.

4
5 4. On or about April 25 - May 9, 1998, while assigned to the Public Safety
6 Training Academy as a TAC officer, the respondent allegedly accessed sexually
7 explicit sites on the Academy computer.

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10 5. On or about July 17, 1998, an internal investigation was initiated by the
11 North Slope Borough Police Department regarding the access of sexually explicit sites
12 on the Internet by the respondent from state and North Slope Borough computers.

13
14 6. On or about July 30, 1998, the respondent was ordered to undergo a
15 Computer Voice Stress Analysis (CVSA). The CVSA was administered and
16 respondent was found to be deceptive in responses to specific questions regarding
17 access of sexually explicit materials on the State Trooper Academy computer.

18
19 7. On or about August 5, 1998, respondent admitted to Sgt. Jon Owens that
20 he had lied during his initial interview with Sgt. Owens on July 28, 1998.

21
22 8. On or about August 7, 1998, respondent resigned in lieu of termination
23 from the North Slope Borough Police Department.

24
25 9. On or about August 10, 1998, the respondent was recommended for de-
26 certification, by the North Slope Borough Police Department.

27
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30 COUNT I

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32 10. Paragraphs 1-9 are incorporated by reference as though set forth in
detail.

On or about August 7, 1998, the respondent resigned in lieu of termination for cause
relating to misconduct or dishonesty, from employment as a police officer in the state
of Alaska; and therefore, his police officer certificate should be revoked under

1 AS 18. 65. 240 (a) (2) and (c) and 13 AAC 85. 110 (b) (3).
2

3
4 WHEREFORE, the Administrator prays that Seri S. Mohm's certificate as a
5 police officer in the State of Alaska be revoked.
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7 DATED this 12 day of January 1999, at Juneau, Alaska.
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12 Laddie Shaw, Administrator
13 Alaska Police Standards Council
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