

Issued Date: February 12, 2026

From: Deputy Director Nelson R. Leese (on behalf of Director Bonnie J. Glenn)
Office of Police Accountability 

Case Number: 2025OPA-0152

Allegations of Misconduct & Director's Findings

Named Employee #1

1. **Allegation #1: 4.020 – Reporting and Recording Overtime/Out of Classification Pay 4.020-POL-1 Civilians, Officers, Detectives, Sergeants, and Lieutenants 4. Supervisor Responsibilities for Monitoring Overtime Use**
Finding: Not Sustained - Training Referral
 2. **Allegation #2: 5.001 - Standards and Duties POL-2. Employees Must Adhere to Laws, City Policy, and Department Policy**
Finding: Not Sustained - Management Action
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Named Employee #2

1. **Allegation #1: 5.001 - Standards and Duties POL-2. Employees Must Adhere to Laws, City Policy, and Department Policy**
Finding: Sustained
 - **Proposed Discipline: One Day (9 Hours) to Three Days (27 Hours) Suspension**
 - **Imposed Discipline: Three Days (27 Hours) Suspension**
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This Closed Case Summary (CCS) represents the opinion of the OPA Director regarding the misconduct alleged and therefore sections may be written in the first person.

Executive Summary:

An anonymous complainant alleged that the named employees (NE#1 and NE#2) submitted inaccurate overtime records for over a year and a half. The Complainant also alleged that NE#1, an acting sergeant, aided NE#2 by approving NE#2's inaccurate overtime submissions.

Administrative Note:

On September 24, 2025, the Office of Inspector General certified this case as thorough, timely, and objective.

Summary of the Investigation:

On April 29, 2025, an anonymous complainant submitted an OPA complaint, alleging that the named employees “have been falsifying [overtime] slips and submitting for time that has not been worked.” The complaint stated that NE#1, as an acting sergeant, had been approving NE#2’s overtime hours.

OPA investigated the complaint by reviewing the computer-aided dispatch (CAD) logs, overtime request forms (ORFs), data from NE#2’s proximity card access to the West Precinct, and interview statements from the named employees.

Named Employee #2 – Overtime Dates and Times

The following dates indicate when NE#2 worked overtime during first watch augmentation from September 7, 2024, through April 21, 2025. CAD records indicate when NE#2 logged on and off the CAD system—which provides information to officers regarding dispatched calls but is not a worktime tracking system. Proximity card access indicates when NE#2 used his proximity card to access the West Precinct. The ORF shows the overtime hours NE#2 claimed. The difference indicates the discrepancy between the longest time NE#2 can be definitively shown to have been working—by either CAD or proximity card records—and the time claimed on his ORF. An “excess” note indicates where NE#2 worked more hours than he claimed.

Date	CAD Sign On and Sign Off; Proximity Card Access	ORF	Difference	Overtime Approver
Sep. 7, 2024	6:47 AM (sign on) 1:28 PM (prox. card) 1:29 PM (sign off) <i>6 hours, 42 minutes</i>	6:00 AM (start) 2:00 PM (end) <i>8 hours</i>	1 hour, 18 minutes	NE#1
Sep. 8, 2024	9:11 AM (prox. card) 9:35 AM (sign on) 1:38 PM (sign off) <i>4 hours, 27 minutes</i>	No ORF located; 8 hours paid overtime on timesheet	3 hours, 33 minutes	Unknown
Sep. 16, 2024	5:47 AM (prox. card) 6:14 AM (sign on) 12:23 PM (sign off) <i>6 hours, 36 minutes</i>	No ORF located; 5 hours paid overtime on timesheet	1 hour, 36 minutes (excess)	Different sergeant
Sep. 17, 2024	6:10 AM (prox. card) 6:35 AM (sign on) 11:27 AM (sign off) <i>5 hours, 17 minutes</i>	No ORF located; 5 hours paid overtime on timesheet	17 minutes (excess)	Unknown

Sep. 18, 2024	6:06 AM (prox. card) 6:40 AM (sign on) 11:44 AM (sign off) <i>5 hours, 38 minutes</i>	No ORF located; 5 hours paid overtime on timesheet	38 minutes (excess)	Unknown
Sep. 23, 2024	6:53 AM (prox. card) 7:31 AM (sign on) 1:18 PM (sign off) <i>6 hours, 25 minutes</i>	No ORF located; 7 hours paid overtime on timesheet	35 minutes	Unknown
Oct. 19, 2024	7:04 AM (prox. card) 7:36 AM (sign on) 1:55 PM (sign off) <i>6 hours, 51 minutes</i>	7:00 AM (start) 2:00 PM (end) <i>7 hours</i>	9 minutes	NE#1
Oct. 22, 2024	6:50 AM (prox. card) 8:48 AM (sign on) 12:18 PM (sign off) <i>5 hours, 28 minutes</i>	7:00 AM (start) 11:00 AM (end) <i>4 hours</i>	1 hour, 28 minutes (excess)	Different sergeant
Oct. 23, 2024	6:29 AM (prox. card) 6:49 AM (sign on) 11:40 AM (sign off) <i>5 hours, 11 minutes</i>	6:00 AM (start) 2:00 PM (end) <i>8 hours</i>	2 hours, 49 minutes	NE#1
Oct. 24, 2024	7:06 AM (prox. card) 7:27 AM (sign on) 12:44 PM (sign off) <i>5 hours, 38 minutes</i>	6:00 AM (start) 2:00 PM (end) <i>8 hours</i>	2 hours, 22 minutes	NE#1
Nov. 13, 2024	9:25 AM (prox. card) 9:54 AM (sign on) 1:26 PM (sign off) <i>4 hours, 1 minute</i>	8:00 AM (start) 2:00 PM (end) <i>6 hours</i>	1 hour, 59 minutes	NE#1
Nov. 14, 2024	9:27 AM (prox. card) 10:07 AM (sign on) 1:27 PM (sign off) <i>4 hours</i>	7:30 AM (start) 2:00 PM (end) <i>6 hours, 30 minutes</i>	2 hours, 30 minutes	NE#1
Nov. 19, 2024	7:23 AM (prox. card) 9:15 AM (sign on) 1:11 PM (sign off) <i>5 hours, 48 minutes</i>	No ORF located; 8 hours paid overtime on timesheet	2 hours, 12 minutes	Unknown
Nov. 29, 2024	7:31 AM (prox. card) 8:39 AM (sign on) 12:42 PM (sign off) <i>5 hours, 11 minutes</i>	6:00 AM (start) 11:00 AM (end) <i>5 hours</i>	11 minutes (excess)	NE#1
Dec. 3, 2024	5:32 AM (prox. card) 6:05 AM (sign on) 1:32 PM (sign off) <i>8 hours</i>	5:00 AM (start) 2:00 PM (end) <i>9 hours</i>	1 hour	NE#1
Dec. 4, 2024	8:37 AM (prox. card) 9:07 AM (sign on) 2:09 PM (sign off) <i>5 hours, 32 minutes</i>	5:00 AM (start) 2:00 PM (end) <i>9 hours</i>	3 hours, 28 minutes	NE#1
Dec. 18, 2024	4:47 AM (prox. card)	4:00 AM (start)	2 hours, 11 minutes	NE#1

	5:25 AM (sign on) 11:36 AM (sign off) 6 hours, 49 minutes	1:00 PM (end) 9 hours		
Dec. 30, 2024	4:02 AM (prox. card) 5:14 AM (sign on) 11:29 AM (sign off) 7 hours, 27 minutes	4:00 AM (start) 11:00 AM (end) 7 hours	27 minutes (excess)	Different sergeant
Dec. 31, 2024	6:44 AM (prox. card) 7:33 AM (sign on) 1:57 PM (sign off) 7 hours, 13 minutes	6:00 AM (start) 2:00 PM (end) 8 hours	47 minutes	NE#1
Jan. 8, 2025	No sign on for first watch <u>Second Watch:</u> 12:29 PM (prox. card) 2:02 PM (sign on) 7:07 PM (sign off) 6 hours, 38 minutes	6:00 AM (start) 2:00 PM (end) 8 hours	1 hour, 22 minutes	NE#1
Jan. 18, 2025	4:07 AM (prox. card) 4:38 AM (sign on) 11:37 AM (sign off) 7 hours, 30 minutes	4:00 AM (start) 11:00 AM (end) 7 hours	30 minutes (excess)	NE#1
Jan. 19, 2025	6:12 AM (prox. card) 7:14 AM (sign on) 10:43 AM (sign off) 4 hours, 31 minutes	6:00 AM (start) 11:00 AM (end) 5 hours	29 minutes	NE#1
Jan. 25, 2025	5:45 AM (prox. card) 6:27 AM (sign on) 11:10 AM (sign off) 5 hours, 25 minutes	4:00 AM (start) 11:00 AM (end) 7 hours	1 hour, 35 minutes	Different sergeant
Jan. 26, 2025	6:54 AM (prox. card) 7:28 AM (sign on) 12:10 PM (sign off) 5 hours, 16 minutes	6:00 AM (start) 11:00 AM (end) 5 hours	16 minutes (excess)	Different sergeant
Feb. 1, 2025	4:50 AM (prox. card) 5:23 AM (sign on) 12:00 PM (sign off) 7 hours, 10 minutes	4:00 AM (start) 11:00 AM (end) 7 hours	10 minutes (excess)	Preapproved by a different sergeant; approved by NE#1
Feb. 2, 2025	4:45 AM (prox. card) 5:00 AM (sign on) 7:13 AM (sign off) 2 hours, 28 minutes	4:00 AM (start) 8:00 AM (end) 4 hours	1 hour, 32 minutes	Preapproved by a different sergeant; approved by NE#1
Feb. 10, 2025	6:11 AM (prox. card) 6:48 AM (sign on) 11:24 AM (sign off) 5 hours, 13 minutes	4:00 AM (start) 11:00 AM (end) 7 hours	1 hour, 47 minutes	Preapproved by a different sergeant; approved by NE#1
Feb. 15, 2025	4:09 AM (prox. card)	4:00 AM (start)	48 minutes (excess)	NE#1

	4:36 AM (sign on) 2:57 PM (sign off) 10 hours, 48 minutes	2:00 PM (end) 10 hours		
Feb. 16, 2025	6:37 AM (prox. card) 7:33 AM (sign on) 3:42 PM (sign off) 9 hours, 5 minutes	4:00 AM (start) 2:00 PM (end) 10 hours	55 minutes	NE#1
Feb. 17, 2025	8:33 AM (prox. card) 10:10 AM (sign on) 2:24 PM (sign off) 5 hours, 51 minutes	6:00 AM (start) 2:00 PM (end) 8 hours	2 hours, 9 minutes	NE#1
Feb. 22, 2025	6:56 AM (prox. card) 7:52 AM (sign on) 1:08 PM (sign off) 6 hours, 12 minutes	6:00 AM (start) 2:00 PM (end) 8 hours	1 hour, 48 minutes	NE#1

Feb. 24, 2025	4:14 AM (prox. card) 5:26 AM (sign on) 11:02 AM (sign off) 6 hours, 48 minutes	4:00 AM (start) 12:00 PM (end) 8 hours	1 hour, 12 minutes	NE#1
Feb. 25, 2025	7:15 AM (prox. card) 7:41 AM (sign on) 1:12 PM (sign off) 5 hours, 57 minutes	6:00 AM (start) 11:00 AM (end) 5 hours	57 minutes (excess)	NE#1
Mar. 3, 2025	6:12 AM (prox. card) 6:38 AM (sign on) 1:12 PM (sign off) 7 hours	6:00 AM (start) 2:00 PM (end) 8 hours	1 hour	NE#1
Mar. 11, 2025	3:14 AM (prox. card) 5:01 AM (sign on) 11:32 AM (sign off) 8 hours, 18 minutes	5:00 AM (start) 11:00 AM (end) 6 hours	2 hours, 18 minutes (excess)	NE#1
Mar. 23, 2025	6:54 AM (prox. card) 7:27 AM (sign on) 1:36 PM (sign off) 6 hours, 42 minutes	6:00 AM (start) 2:00 PM (end) 8 hours	1 hour, 18 minutes	NE#1
Mar. 24, 2025	4:18 AM (prox. card) 5:19 AM (sign on) 12:19 PM (sign off) 8 hours, 1 minute	4:00 AM (start) 1:00 PM (end) 9 hours	59 minutes	NE#1
Apr. 19, 2025	6:01 AM (prox. card) 6:29 AM (sign on) 2:10 PM (sign off) 8 hours, 9 minutes	6:00 AM (start) 2:00 PM (end) 8 hours	9 minutes (excess)	NE#1
Apr. 20, 2025	8:25 AM (prox. card) 8:57 AM (sign on) 2:24 PM (sign off)	7:30 AM (start) 2:00 PM (end) 6 hours, 30 minutes	31 minutes	NE#1

	<i>5 hours, 59 minutes</i>			
Apr. 21, 2025	4:48 AM (prox. card) 5:26 AM (sign on) 1:51 PM (sign off) <i>9 hours, 3 minutes</i>	4:00 AM (start) 2:00 PM (end) <i>10 hours</i>	57 minutes	NE#1

Named Employee #2 – OPA Interview

On August 8, 2025, OPA interviewed NE#2. NE#2 said he reviews backfill staffing sheets to identify available augmentation shifts and requests to augment these shifts from a sergeant. NE#2 said he completes ORFs in advance, detailing his intended start time for the shift, and submits it to the sergeant who authorized the overtime shift.

OPA asked NE#2 to explain the 2 hours and 49 minutes of overtime that were unaccounted for on October 23, 2024. NE#2 responded that he was probably released by the supervisor, who may not have been NE#1.

OPA asked NE#2 to explain the 2 hours and 22 minutes of overtime that were unaccounted for on October 24, 2024. NE#2 responded that this day was memorable because he left early due to his wife going into labor. OPA also asked about the discrepancy in start times, with the ORF indicating 6:00 AM and NE#2’s proximity card indicating 7:06 AM. NE#2 responded that he prefills the ORF with his intended start time but sometimes does not arrive at that time. NE#2 said he notifies a supervisor when he arrives at a different time. NE#2 acknowledged that he probably should have retrieved the ORF to amend it but noted that supervisors occasionally tell him not to worry about it. NE#2 was unable to recall whether a supervisor had told him not to worry about his early departure on October 24, 2024.

OPA asked NE#2 to explain the 2 hours and 30 minutes of overtime that were unaccounted for on November 14, 2024. NE#2 provided the same response (prefilling the ORF). NE#2 expressed uncertainty regarding whether NE#1 was aware of this unworked time.

OPA asked NE#2 to explain the 3 hours and 28 minutes of overtime that were unaccounted for on December 4, 2024. NE#2 provided the same response (prefilling the ORF). NE#2 also said NE#1 might have signed NE#2’s ORF on days when they did not work together.

OPA asked NE#2 about whether he worked augmentation for first watch on January 8, 2025, as there was an ORF indicating overtime hours worked. NE#2 responded no but believed this was due to submitting the incorrect form. NE#2 clarified that he prefills forms for first watch, second watch, and third watch, but mistakenly submitted an ORF for first watch when he meant to submit one for second watch, as he had worked overtime for second watch. NE#2 said NE#1 signed this ORF, even though they did not work together on January 8, 2025.

OPA asked NE#2 about the discrepancy in start times on January 25, 2025, with the ORF indicating 4:00 AM and NE#2’s proximity card indicating 5:45 AM. NE#2 responded that he notifies a supervisor when he arrives late, and the supervisor either instructs him to leave or excuses the tardiness, although he was unable to recall which supervisor had excused his tardiness on January 25, 2025.

OPA asked NE#2 about the discrepancy in start times on February 10, 2025, with the ORF indicating 4:00 AM and NE#2’s proximity card indicating 6:11 AM. NE#2 provided the same response (prefilling the ORF with his intended

start time but sometimes arriving at a different time). NE#2 reiterated that he probably should have retrieved his ORF to amend it but noted that supervisors occasionally tell him not to worry about it. NE#2 was unable to recall whether a supervisor had told him not to worry about this discrepancy on February 10, 2025. NE#2 believed NE#1, on possibly two occasions, had told him not to worry about amending his ORF.

NE#2 acknowledged that although the ORFs he submitted did not accurately reflect the hours he worked, he maintained that he did not intend to receive additional compensation for hours he did not work.

Named Employee #1 – Overtime Dates and Times

The following dates indicate when NE#1 worked overtime during first watch augmentation from August 29, 2024, through December 30, 2024:

Date	CAD Sign On and Sign Off	ORF	Difference
Aug. 29, 2024	4:39 AM (sign on) 1:20 PM (sign off) <i>8 hours, 41 minutes</i>	10 hours	1 hour, 19 minutes
Oct. 3, 2024	4:58 AM (sign on) 2:47 PM (sign off) <i>9 hours, 49 minutes</i>	10 hours	11 minutes
Oct. 10, 2024	4:34 AM (sign on) 11:26 AM (sign off) <i>6 hours, 52 minutes</i>	7 hours	8 minutes
Oct. 22, 2024	4:45 AM (sign on) 12:33 PM (sign off) <i>7 hours, 48 minutes</i>	7 hours	48 minutes (excess)
Oct. 26, 2024	4:53 AM (sign on) 1:31 PM (sign off) <i>8 hours, 38 minutes</i>	10 hours	1 hour, 22 minutes
Oct. 27, 2024	8:38 AM (sign on) 1:26 PM (sign off) <i>4 hours, 48 minutes</i>	6 hours	1 hour, 12 minutes
Oct. 28, 2024	4:44 AM (sign on) 1:23 PM (sign off) <i>8 hours, 39 minutes</i>	10 hours	1 hour, 21 minutes
Nov. 9, 2024	6:42 AM (sign on) 12:33 PM (sign off) <i>5 hours, 51 minutes</i>	7 hours	1 hour, 9 minutes
Nov. 23, 2024	7:21 AM (sign on) 12:35 PM (sign off) <i>5 hours, 14 minutes</i>	6 hours	46 minutes
Dec. 2, 2024	9:05 AM (sign on) 2:36 PM (sign off) <i>5 hours, 31 minutes</i>	5 hours, 15 minutes	16 minutes (excess)
Dec. 16, 2024	5:03 AM (sign on) 1:28 PM (sign off) <i>8 hours, 25 minutes</i>	10 hours	1 hour, 35 minutes
Dec. 22, 2024	6:36 AM (sign on) 1:45 PM (sign off)	7 hours, 30 minutes	21 minutes

	<i>7 hours, 9 minutes</i>		
Dec. 30, 2024	5:14 AM (sign on) 11:29 AM (sign off) <i>6 hours, 15 minutes</i>	7 hours, 30 minutes	1 hour, 15 minutes

Named Employee #1 – OPA Interview

On August 12, 2025, OPA interviewed NE#1. NE#1 said officers wanting to work overtime shifts contact supervisors, who add them to a backfill list. NE#1 said these officers could request specific hours for overtime work. NE#1 said officers who augment do not necessarily work the full augmentation shift. NE#1 said officers' overtime would begin before their arrival at the precinct if they were called in for overtime work. NE#1 said officers he preapproves for overtime may work under a different supervisor. NE#1 said he approves ORFs from officers who did not work under him during the shift, such as in cases where he is in the office and they submit ORFs to him. NE#1 admitted to preapproving augmentation shifts for NE#2.

OPA asked whether NE#1 was aware of NE#2's activities during the 2 hours and 49 minutes of overtime that were unaccounted for on October 23, 2024. NE#1 responded no and explained that he was busy during his shift and often serves as the sole first watch supervisor overseeing multiple officers. NE#1 said he releases officers early based on the workload, their performance, or if they had been assigned to another precinct and released by that precinct.

OPA asked why NE#1 signed NE#2's ORF for October 24, 2024, which indicated a 6:00 AM start time, while NE#2's proximity card indicated a 7:06 AM entry. NE#1 responded that he was unsure when NE#2 arrived, as he lacked access to NE#2's proximity card data. NE#1 noted that he signed the ORF on October 27, 2024.

OPA asked why NE#1 signed NE#2's ORF for November 14, 2024, which indicated a 7:30 AM start time, while NE#2's proximity card indicated a 9:27 AM entry. NE#1 responded that he does not monitor when officers arrive and lacks access to their proximity card data. NE#1 also believed monitoring officers' arrival times was unreasonable, especially on days when he is supervising as many as 14 employees.

OPA asked why NE#1 signed NE#2's ORF for December 4, 2024, which indicated a 5:00 AM start time, while NE#2's proximity card indicated an 8:37 AM entry. NE#1 responded that he signed the ORF on December 18, 2024, noting that some sergeants sign ORFs at the end of the pay period. NE#1 was unable to recall when NE#2 submitted the ORF. NE#1 also noted the impracticality of supervising overtime for every officer who submitted an ORF to him.

OPA asked why NE#1 signed NE#2's ORF for January 8, 2025, when NE#2 did not work first watch that day. NE#1 responded that he was unaware of NE#2's absence but attributed the ORF to a mistake. NE#1 acknowledged that he did not verify whether NE#2 worked first watch that day but reiterated the impracticality of obtaining NE#2's proximity card data, considering the number of officers under his supervision.

OPA asked why NE#1 signed NE#2's ORF for February 10, 2025, when NE#1 was absent that day due to training and could not supervise NE#2. NE#1 responded that he signed the ORF upon his return to work on February 15, 2025. NE#1 admitted to having signed ORFs for days when he had no way of knowing whether officers had worked.

OPA asked whether NE#1 authorized NE#2 to claim overtime on ORFs for which NE#2 did not work. NE#1 responded that in situations where he summoned NE#2 to the precinct, overtime would start the moment he

called NE#2. NE#1 said he obtained approval from his lieutenant to authorize overtime in this manner, especially when he anticipated that the watch would fall below minimum staffing levels. NE#1 was unable to recall specific dates when he summoned NE#2 to the precinct but noted that NE#2 made himself available for overtime work before his baby was born. NE#1 clarified that he did not authorize NE#2 to claim overtime on days he did not work first watch. NE#1 said NE#2 typically did not specify the hours he wanted to work. NE#1 said he would be unaware of times when NE#2 arrived late, as he does not monitor officers' arrival times.

Analysis and Conclusions:

Named Employee #1 – Allegation #1

4.020 – Reporting and Recording Overtime/Out of Classification Pay, 4.020-POL-1 Civilians, Officers, Detectives, Sergeants, and Lieutenants, 4. Supervisor Responsibilities for Monitoring Overtime Use

The Complainant alleged that NE#1 aided NE#2 by approving NE#2's inaccurate overtime submissions.

Supervisors are responsible for ensuring that staff operate in a manner minimizing the need for overtime. SPD Policy 4.020-POL-1(4). Supervisors shall ensure that all overtime is authorized in advance and the work done on overtime is necessary to the Department's mission and consistent with policy. *Id.* Supervisors shall ensure that overtime requests are completed in accordance with the procedures established in policy and the appropriate reason for the overtime is recorded in the documentation. *Id.*

There was insufficient evidence to indicate that NE#1 approved NE#2's ORFs with knowledge that they were inaccurate. Rather, a preponderance of the evidence indicated that NE#1 relied upon NE#2's representations in those ORFs and accepted them without scrutiny. Several reasons explain why NE#1 acted in this manner. NE#1 was a first watch supervisor—sometimes the sole supervisor on certain days—who oversaw up to fourteen officers. NE#1 explained that he is busy during his shift, making it impractical to monitor the arrival and departure times of officers, especially since he lacks access to their proximity card data. Finally, NE#1 frequently signs ORFs several days later, making it unlikely for him to recall the specific times that NE#2 worked. Considering these factors, NE#1 would understandably rely heavily on NE#2's representations in his ORFs.

However, the lack of oversight on NE#1's part contributed to several mistakes. First, NE#1 signed NE#2's ORF for January 8, 2025, when NE#2 did not work first watch that day. Second, NE#1 signed NE#2's ORF for February 10, 2025, when NE#1 was absent that day due to training and could not supervise NE#2's work. Third, NE#1 signed numerous ORFs that did not accurately reflect the hours NE#2 worked. NE#1 even admitted to having signed ORFs for days when he had no way of knowing whether officers had worked.

OPA recognizes the ongoing challenge of managing overtime for a large number of subordinates with irregular schedules. But NE#1 must implement some form of supervision regarding overtime use beyond faith-alone reliance on the accuracy of submitted ORFs. This could involve a brief consultation with subordinates, making a practice of reviewing ORFs during each shift, or requiring subordinates to turn in ORFs immediately after completing overtime as opposed to prefilling them. NE#1 should be retrained on the importance of exercising supervisory responsibilities before approving his subordinates' ORFs.

Accordingly, OPA recommends that this allegation be Not Sustained – Training Referral.

- **Required Training:** NE#1's chain of command should discuss OPA's findings with him, review SPD Policy 4.020 with him, and provide any other retraining and counseling it deems necessary. Any retraining and counseling should be documented and maintained in Blue Team.

Recommended Finding: **Not Sustained – Training Referral**

Named Employee #1 – Allegation #2

5.001 – Standards and Duties, 5.001-POL-2. Employees Must Adhere to Laws, City Policy, and Department Policy

The Complainant alleged that NE#1 submitted inaccurate overtime records.

Employees must adhere to laws, city policy, and department policy. SPD Policy 5.001-POL-2.

NE#1's overtime submissions appeared generally accurate. To the extent they showed any potential discrepancy, the difference was less than or about an hour. The largest difference was 1 hour, 35 minutes. This does not necessarily indicate unworked overtime. In fact, officers often require time to prepare before signing into CAD, which may involve consulting with a supervisor or gathering necessary items for their shift. Officers may also continue working 30 minutes after signing off from CAD. See SPD Policy 12.010-POL-2(6) (requiring officers to remain available until 30 minutes before they end their shift). OPA stresses that neither CAD nor proximity cards are time-keeping systems. Both programs serve other operational purposes but were used in this investigation to corroborate the amount of work time claimed. Overall, OPA found insufficient evidence to support the claim that NE#1 intentionally submitted inaccurate overtime records. Accordingly, this portion of this allegation is Unfounded.

However, OPA takes this opportunity to once again recommend that SPD improve its overtime approval, tracking, and monitoring system to support its employees and supervisors with more accurately recording hours worked across SPD. SPD should consider refining its policies and procedures to prohibit "pre-filling" ORFs or, because police officers work erratic schedules and are all provided Department-issued cell phones, consider technological solutions to have employees "clock in" and "clock out" for both regular and overtime work shifts to ensure accurate pay.

Recommended Finding: **Not Sustained – Management Action**

Named Employee #2 – Allegation #1

5.001 – Standards and Duties, 5.001-POL-2. Employees Must Adhere to Laws, City Policy, and Department Policy

The Complainant alleged that NE#2 submitted inaccurate overtime records.

Considering the elevated standard of review for allegations stigmatizing to law enforcement officers, see SPOG CBA article 3.1, OPA finds there was insufficient evidence to prove NE#2 violated the law. However, OPA finds that, more likely than not, NE#2 violated City policy, Department policy, and provisions of the SPOG CBA concerning overtime.

There was insufficient evidence to indicate that NE#2 submitted inaccurate overtime records with the intent to receive additional compensation for hours he did not work. Rather, the evidence indicated that NE#2 was, at best, extremely lax or, at worst, reckless in tracking and recording his time. Several aspects of the time discrepancies

themselves indicated NE#2 did not intend to wrongfully receive compensation. First, nineteen overtime submissions appeared generally accurate, as these submissions were for periods less than two hours of potentially unworked overtime.¹ Ten of these were for one hour or less. As noted above, officers may be working both before and after the times they are signed into CAD, which itself is not a time tracking system. Thus, an overtime difference of less than two hours does not definitively indicate unworked overtime. Second, thirteen overtime submissions showed NE#2 working beyond his scheduled hours—sometimes for significant periods.² This resulted in a total of nine hours, forty-five minutes of overtime that was not paid to NE#2, itself a policy violation. See SPD Policy 4.020-POL-1(6) (“Employees are compensated for authorized overtime worked.”). Third, only eight submissions exceeded two hours of potentially unworked overtime.³ One of these days was understandable, even if not in line with the letter of policy, as NE#2 left early due to his wife going into labor on October 24, 2024. It is also possible that other practices—such “starting” overtime from the moment an officer is ordered in for unscheduled overtime, effectively paying the officer for their commute—could possibly account for other discrepancies. Overall, the evidence reflected NE#2’s failure to accurately account for his overtime, not a criminal intent to receive additional compensation for hours he did not work.

NE#2’s unawareness regarding his overtime is further supported by the hazard-prone manner he completed his ORFs. He explained to OPA that he “prefills” his ORFs and even completes ORFs for multiple watches within a single day. However, NE#2’s decision to proactively prefill his ORFs ultimately led to several irregularities. There were eight days—possibly seven, should OPA disregard the day on which NE#2’s wife went into labor—during which NE#2’s unaccounted overtime exceeded two hours. One day showed overtime hours NE#2 worked for first watch augmentation when he actually worked second watch augmentation. There were also several days where there were discrepancies in start times, with NE#2 arriving at the precinct much later than his intended start time. OPA noted NE#2’s explanation for this:

Once again, I – I prefilled in. When I signed up, I told the sergeant I would be there at 0400. I tried to prioritize the wellness aspect of it and just come in at – you know, when my body, like, allows me to. And I – I come in; I ask my assignment, and I don’t know every one date for date. Sometimes I’ve been told, “Hey, don’t worry about it. Thanks for being here.” ... And there are times I’ve probably failed to pull [the ORF] back and resubmit.

¹ These nineteen submissions included the following: Sep. 7, 2024 (1 h, 18 m); Sep. 23, 2024 (35 m); Oct. 19, 2024 (9 m); Nov. 13, 2024 (1 h, 59 m); Dec. 3, 2024 (1 h); Dec. 31, 2024 (47 m); Jan. 8, 2025 (1 h, 22 m); Jan. 19, 2025 (29 m); Jan. 25, 2025 (1 h, 35 m); Feb. 2, 2025 (1 h, 32 m); Feb. 10, 2025 (1 h, 47 m); Feb. 16, 2025 (55 m); Feb. 22, 2025 (1 h, 48 m); Feb. 24, 2025 (1 h, 12 m); Mar. 3, 2025 (1 h); Mar. 23, 2025 (1 h, 18 m); Mar. 24, 2025 (59 m); Apr. 20, 2025 (31 m); and Apr. 21, 2025 (57 m).

² These 13 submissions included the following: Sep. 16, 2024 (1 h, 36 m) Sep. 17, 2024 (17 m); Sep. 18, 2024 (38 m); Oct. 22, 2024 (1 h, 28 m); Nov. 29, 2024 (11 m); Dec. 30, 2024 (27 m); Jan. 18, 2025 (30 m); Jan. 26, 2025 (16 m); Feb. 1, 2025 (10 m); Feb. 15, 2025 (48 m); Feb. 25, 2025 (57 m); Mar. 11, 2025 (2 h, 18 m); and Apr. 19, 2025 (9 m).

³ These 8 submissions included the following: Sep. 8, 2024 (3 h, 33 m); Oct. 23, 2024 (2 h, 49 m); Oct. 24, 2024 (2 h, 22 m); Nov. 14, 2024 (2 h, 30 m); Nov. 19, 2024 (2 h, 12 m); Dec. 4, 2024 (3 h, 28 m); Dec. 18, 2024 (2 h, 11 m); and Feb. 17, 2025 (2 h, 9 m).

OPA recognizes the possibility that supervisors might have told NE#2 not to worry about amending his ORFs on unspecified occasions.⁴ Troublingly, this would be assuming authority that the supervisors did not have, and which NE#2 could not reasonably believe they had: the ability to authorize overtime pay for unworked hours. OPA believes these issues could have been significantly mitigated if NE#2 did not prefill his ORFs. Going forward, OPA recommends NE#2 complete his ORFs *after* finishing an overtime shift with the hours he in fact worked to ensure the accuracy of ORF submissions.

Although OPA finds insufficient evidence to conclude NE#2 violated the law, this does not end the analysis of whether NE#2 upheld the “standards and duties” set forth in SPD Policy 5.001. SPD Policy 5.001-POL-2 also requires SPD employees adhere to City of Seattle Policy, Department policy, and applicable collective bargaining agreements. All clearly required that NE#2 only be paid overtime for hours he actually “worked.” See City Personnel Rules 3.6.4 Rate of Compensation (“Hourly employees will be compensated at the rate of 1½ times their regular rate of pay for all hours and fractions of hours worked beyond the overtime threshold in a workweek for ordinary overtime.”) and 9.1.9 Overtime (“Hourly employees are eligible to receive overtime compensation for all hours worked beyond the overtime threshold in a work week.”); SPD Policies 4.020-POL-1(6) (“Employees are compensated for authorized overtime worked.”) and 4.020-POL-1(10) (“Employees report overtime worked on the appropriate form.”); SPOG CBA Article 5.4 Overtime (“Employees on the nine (9) hour day schedule shall be paid at the rate of time and one-half (1 1/2) for all hours worked in excess of nine (9) in one (1) day and for all hours worked on a scheduled furlough day.”) (emphasis added to each citation). The expectation that NE#2 needed to submit accurate and complete ORFs to be compensated only for overtime hours actually worked is also common sense and required by other sections of title 5, section 1 of the SPD Manual, such as Policies 5.001-POL-10 (Employees Will Strive to be Professional) and 5.001-POL-11 (Employees Will be Truthful and Complete in All Communication). See SPOG CBA 3.6(A) (requiring classification notices contain a minimum of the title and section of policy an employee potentially violated).

Here, NE#2’s inaccurate overtime submissions violated policy in two ways: he was both overpaid and underpaid for overtime. Even accounting for the fact that not every discrepancy between his CAD logs or proximity card records and his ORFs definitively proved overpayment, OPA finds—more likely than not—that NE#1 overwhelmingly submitted ORFs for more overtime than he worked. But NE#2’s sloppy record keeping also clearly showed times he worked more overtime than he requested in his ORF, which also violated policy. See SPD Policy 4.020-POL-1(2) (“Employees Require Pre-Approval from a Supervisor to Work Overtime”); SPD Policy 4.020-POL-1(6) (“Employees Are Compensated for Authorized Overtime Worked”).

In his OPA interview, NE#2 acknowledged that his ORFs did not accurately reflect the overtime hours he worked. Throughout his interview, he repeatedly attributed these inaccuracies to his practice of prefilling his ORFs. NE#2 stated that “any sergeant” in “any precinct” that he’s augmented has told him not to worry about correcting his ORFs and that, instead, he would be paid for the hours on his sheet. When OPA pressed for specific sergeants or dates, NE#2 was not specific, saying NE#1 had “once or twice” and that another sergeant (whose exact name he did not know) had “probably” told him the same thing. But, even if different supervisors had, on one-off occasions, signed his overtime forms—when both NE#2 and the various supervisors putatively knew NE#2’s ORF was inaccurate—this should have triggered a commitment in NE#2 to either stop prefilling his ORFs, arrive at his

⁴ It was unclear from this characterization whether he was claiming supervisors’ putative statement—“don’t worry about it”—referred to the *fact* he was later than expected or to disregard the related need to *amend* his ORFs. For this analysis, OPA presumes NE#2 was claiming the latter.

overtime shifts on time and leave on time in the future, or to amend his ORFs when they were erroneous. Instead, it appears NE#2 continued his inaccurate practice of prefilling his ORFs. As NE#2 acknowledged in his OPA interview, “there are times I probably failed to pull it back and resubmit it.” OPA concurs.

Accordingly, OPA recommends that this allegation be Sustained.

Recommended Finding: **Sustained**