



## Seattle Office of Police Accountability

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December 23, 2024

Interim Chief Sue Rahr  
Seattle Police Department  
PO Box 34986  
Seattle, WA 98124-4986

Dear Chief Rahr:

Please see the below Management Action Recommendation.

### Case Number

- 2023OPA-0551 / 2024COMP-0009

### Topic

- Standards of Duties - Employee reporting of suspected criminal activity

### Summary

It was alleged the named employee did not report potentially relevant information concerning suspected serious criminal activity to out-of-state law enforcement.

### Analysis

- A named employee had an ongoing romantic relationship with a community member who was presumed missing while working out of state. The community member was later found deceased. An allegation was made that the named employee neglected to report the potentially relevant information they had and cooperate with investigating authorities.
- SPD Policy 5.001 – Standards and Duties states “the philosophy for employee conduct and professionalism. It is not the Department's intent to interfere with or constrain the freedoms, privacy, and liberties of employees; discipline will only be imposed where there is a connection between the conduct and the duties, rank, assignment, or responsibilities of the employee.”<sup>1</sup> The policy also provides:
  - Policy 5.001 (10), Employees will strive to be professional, states “Regardless of duty status, employees may not engage in behavior that undermines public trust in the Department, the officer, or other officers.”
  - Policy 5.001 (18) states “Employees will not associate with persons or organizations where such association reasonably gives the appearance of conflict of interest.” It also states employees will not “engage in enforcement, investigative, or administrative functions” where there could be the “appearance of impropriety.”
- The City of Seattle’s Code of Ethics does not address whether the named employee had a duty to report.<sup>2</sup>

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<sup>1</sup> Seattle Police Department. [Policy Manual](#). Policy 5.001. Effective: 5/01/2021.

<sup>2</sup> City of Seattle Municipal Code. [Code of Ethics](#). Chapter 4.16. 9/4/2024.



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- OPA researched policies from a list of comparable cities. Portland,<sup>3</sup> San Francisco,<sup>4</sup> Sacramento,<sup>5</sup> Denver,<sup>6</sup> and Chicago<sup>7</sup> have policies related to professionalism which state the need to maintain behavior that does not impact the department negatively. They also require reporting officer misconduct rather than community members' conduct, but do not articulate which crimes to report beyond domestic violence. Two comparable cities appear to have more specific or robust policies:
  - Los Angeles has a provision outlining the need to report suspected criminal activity.<sup>8</sup>
  - San Diego has a conduct unbecoming policy as well as an immoral conduct policy.<sup>9</sup>
- The International Association of Chiefs of Police's code of ethics states the need to keep "private life unsullied" and discusses the likelihood of a relationship leading to larger issues related to not fulfilling duties, disparate treatment, or a lack of enforcement of the law.<sup>10</sup> Denver police department's Code of Ethics similarly requires officers keep their "private life unsullied."
- Portland's policy provides specific guidance concerning what personal associations could create the appearance of impropriety.<sup>11</sup>

### Recommendations

- SPD should clearly articulate under what circumstances employees may be required to provide potentially relevant information to other law enforcement agencies.
- SPD should provide specific guidance or examples concerning the Department's expectations for avoiding the appearance of impropriety.

I appreciate your consideration and look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Glenn".

Bonnie Glenn

Interim Director, Office of Police Accountability

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<sup>3</sup> City of Portland Police Department. [Administrative Rules Adopted by Bureaus Pursuant to Rule Making Authority](#). PRB-0310.00. Professional Conduct and Courtesy. Effective: 5/15/20.

<sup>4</sup> San Francisco Police Department. [General Order](#). General Rules of Conduct. Effective 10/18/2023.

<sup>5</sup> City of Sacramento Police Department. [Policy and Procedures](#). General and Professional Conduct. Revised: 01/17/2023.

<sup>6</sup> Denver Police Department. [Operations Manual](#). First Effective: January 1, 2018.

<sup>7</sup> Chicago Police Department. [General Order G08-03](#). Prohibitions on Criminal and Biased Organizations. Effective: 6/24/2024.

<sup>8</sup> Los Angeles Police Department. Policy Manual. Policy 590.

<sup>9</sup> San Diego Police Department. Policy Manual. Revised: 3/10/2022.

<sup>10</sup> International Association of Chiefs of Police. Law Enforcement Code of Ethics. <https://www.theiacp.org/resources/law-enforcement-code-of-ethics>

<sup>11</sup> See fn. 4, above.