

December 19, 2025

Chief Shon F. Barnes
Seattle Police Department
PO Box 34986
Seattle, WA 98124-4986

Dear Chief Barnes:

Please see the Management Action Recommendation below.

Case Number

- 2025OPA-0160 / 2025COMP-0017

Topic

- Enforcing Indecent Exposure

Summary

- Multiple complainants alleged several named employees violated policy by unlawfully detaining and trespassing a community member from Denny Blaine Park for indecent exposure because of bias.

Analysis

- Denny Blaine Park is a space known for public nudity that has with historic ties to Seattle's LGBTQ+ community.
- In this case, SPD officers instructed multiple nude community members to dress and trespassed one community member who refused. The SPD officers and community members disagreed about whether nudity at the park was lawful.
- *City of Seattle v. Johnson* held the Washington State Constitution protects nude expression, invalidating a Seattle Municipal Code section criminalizing lewd conduct as unconstitutionally vague and overbroad.¹
- After the *Johnson* decision, the Seattle Municipal Code adopted Washington State's indecent exposure statute.²
- Washington State's indecent exposure statute states: "A person is guilty of indecent exposure if he or she intentionally makes any open and obscene exposure of his or her person or the person of another knowing that such conduct is likely to cause reasonable affront or alarm..."³
- OPA's investigation revealed uncertainty and confusion regarding enforcement standards of the indecent exposure statute, even among higher-ranking SPD officers. OPA's investigation also found some evidence of inconsistent enforcement of the indecent exposure statute within Denny Blaine Park.

¹ *City of Seattle v. Johnson*, 58Wn. App. 64, 791 P.2d 266 (1990).

² SMC 12A.09.020.

³ [RCW 9A.88.010. Indecent Exposure.](#)



Recommendations

- SPD should consider establishing clear enforcement standards for the indecent exposure statute. These standards should clarify SPD's interpretation of the indecent exposure statute and establish criteria SPD officers must consider before taking enforcement action.
- SPD should promulgate these standards through policy, published directive, and/or training.
- SPD should consider developing these standards in conversation with community groups, considering historical uses and culturally significant spaces such as Denny Blaine Park.
- SPD should continue working with Seattle Park Rangers to address these issues.

I appreciate your consideration and look forward to your response.

Sincerely,

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

Bonnie J. Glenn
Director, Office of Police Accountability