



## CLOSED CASE SUMMARY

ISSUED DATE: MARCH 28, 2025

FROM: INTERIM DIRECTOR BONNIE GLENN  
OFFICE OF POLICE ACCOUNTABILITY

CASE NUMBER: 2024OPA-0393

### Allegations of Misconduct & Director's Findings

#### Named Employee #1

Allegation(s):		Director's Findings
# 1	5.001 – Standards and Duties, 5.001-POL-11. Employees Will Be Truthful and Complete in All Communication	Not Sustained - Management Action
# 2	5.001 – Standards and Duties, 5.001-POL-10. Employees Will Strive to be Professional	Not Sustained - Training Referral

*This Closed Case Summary (CCS) represents the opinion of the OPA Director regarding the misconduct alleged and therefore sections are written in the first person.*

### EXECUTIVE SUMMARY:

Named Employee #1 (NE#1) participated as a certifier during the Washington State canine explosive detection certification process. It was alleged that NE#1 was dishonest by altering or falsifying test scores to facilitate the certification of canine teams. It was also alleged that NE#1 undermined public trust in himself and the Seattle Police Department (SPD) through his conduct during the certification process.

### ADMINISTRATIVE NOTE:

On March 17, 2025, the Office of Inspector General certified OPA's investigation as thorough, timely, and objective.

### SUMMARY OF INVESTIGATION:

OPA's investigation included a review of the OPA complaint, Washington State Criminal Justice Training Commission (CJTC) canine records, and King County Sheriff's Office (KCSO) Internal Investigations Unit Records. Moreover, OPA interviewed employees from KCSO, CJTC, SPD, and Washington State Patrol (WSP). OPA also interviewed NE#1.

#### **A. OPA Complaint**

On October 2, 2024, the Complainant—a KCSO captain serving as the commander of KCSO's Internal Investigations Unit—forwarded OPA a written statement authored by a KCSO deputy (Deputy #1). The Complainant indicated that Deputy #1 sent her written statement to the CJTC, which then relayed it to the KCSO. Deputy #1's written statement was dated September 24, 2024, and titled, "Allegations of Cheating During an Explosive Detection Canine State Certification Test and Possible Perjury on State Certification Forms."



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Deputy #1 wrote the following in her statement:

Deputy #1 is an explosive detection canine handler. In August 2024, Deputy #1 became aware of concerns regarding a Washington State canine explosive detection certification test, during which a KCSO deputy (Deputy #2), NE#1, and a Port of Seattle sergeant (Sergeant #1) were present as either observers or state certifiers. Deputy #2 trained four of the five teams that participated in the test.

NE#1 met with Deputy #1 in September 2024, about a month after the certification. During this meeting, NE#1 told Deputy #1 that he had observed Deputy #2 “handling and moving aided/hides” with his bare hands, despite Deputy #2’s obligation to remain uninvolved and neutral. Deputy #2’s action contaminated the hides with his scent, interfering with the neutral scent profile necessary for the canines. Such interference was contrary to established best practices and raised questions about whether Deputy #2’s four teams accurately identified the trained explosive odors or merely reacted to his familiar scent.

During the September 2024 meeting, NE#1 also told Deputy #1 that Deputy #2 pressured him to transfer passing scores for the four KCSO canine teams from one day of the examination to another day that recorded failing scores. NE#1 described this as “cherry picking scores.” NE#1 also mentioned that Sergeant #1 raised concerns about his observations of Deputy #2. NE#1 believed that Deputy #2 cheated, aiming to provide the four canine teams he trained with an unfair advantage in locating the hides. According to NE#1, Sergeant #1 encouraged NE#1 to report Deputy #2’s actions to KCSO or CJTC. NE#1 expressed regret over his handling of the matter and felt hesitant to confront Deputy #2. NE#1 wished to rectify the situation and indicated a desire to report the incident to KCSO.

Deputy #1 noted that Deputy #2 had extensive experience as a canine handler, trainer, Washington State Canine Evaluator, and member of the Washington CJTC Canine Standards Board. Deputy #1 wrote that others at KCSO had “loyalties, close friendships and positive opinions” of Deputy #2. Deputy #1 expressed fears of retaliation from KCSO and voiced concerns regarding the objectivity of KCSO’s investigation into the matter.

Deputy #1 alleged that the compromised certification process resulted in four canine teams receiving invalid certifications, indicating that they may not have satisfied the minimum state requirements for identifying trained odors. Deputy #1 expressed the public safety concern this created for the public and other officers. Four canine teams were awarded passing scores, while one team, which did not benefit from the “same testing advantages,” received a failing score. Deputy #1 believed the flawed process undermined the integrity of the state’s canine certification program. Deputy #1 was not present during the alleged cheating incident and based her understanding on information relayed to her. Deputy #1 wrote that NE#1 told her he reported the matter to his supervisors, fulfilling his duty to report the situation. Deputy #1 expressed disagreement with the “foundation and reasoning” NE#1 shared with her regarding this disclosure, which she felt obligated her to report separately.

## **B. King County Sheriff’s Office Internal Investigations Unit (KCSO-IIU) Records**

KCSO-IIU has been investigating these allegations concurrently with OPA. OPA received and reviewed KCSO-IIU records in October 2024 and February 2025. OPA understands the KCSO-IIU investigation remains ongoing.

Among other documents, KCSO-IIU provided OPA with transcripts of their interviews with Deputy #1 and Deputy #2.



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Deputy #1 Interview

On October 8, 2024, KCSO-IIU and a representative of the King County Office of Law Enforcement Oversight (OLEO) interviewed Deputy #1. Her statements were consistent with her written statement. She recounted having lunch with NE#1, during which he expressed a desire to reverse time and redo the certification process. She said NE#1 told her that he had spent over 50 hours trying to certify five canine teams within a week and a half, dedicating at least 10 hours to each handler. She characterized this as an excessive amount of time, as a certification should be completed within one day. She said NE#1 had 15 evaluation packets for the canine teams, although he was only expected to have one, leading her to believe he had to repeatedly rewrite the packets. She said NE#1 told her that he wanted to stop the certification process by the first or second day but felt obligated to proceed. She said NE#1 and Deputy #2 had disagreements about handling the hides. She said NE#1 told her that the teams consistently failed, meaning the dogs either did not recognize the odors or, while they did, the handlers did not notice the changes in the dogs' behavior. She said state rules would have required NE#1 to end the certification process and direct everyone to undergo retraining, yet they continued for several days. She said NE#1 believed the teams should not have been certified because they were unprepared.

Deputy #2 Interview

On December 24, 2024, KCSO-IIU and a representative of OLEO interviewed Deputy #2. He said he is a certified trainer for explosive dogs and a certified evaluator for CTJC. He said this was his second group to undergo certification. He said he managed two explosive dogs throughout his professional career. He said the state required 400 hours of training before a team could be certified, but he mentioned that some teams were prepared for certification much earlier. If he believed a team met the minimum state requirements much earlier, he would encourage the team to pursue certification and utilize the remaining hours for additional specialized training. He described this process as a "mock" test or pretest but claimed that a passing score should be considered a legitimate pass, subject to later approval after the 400-hour requirement was met. He said if the team failed, the team could identify weaknesses for preparation. He said CJTC gave certifiers this flexibility and claimed that NE#1 agreed to this approach. He said CJTC required only one state-certified evaluator for the certification process, while the presence of observers was optional. He said the certification process involved the teams locating seven hides twice in five different venues and indicated that the scoring criteria for the evaluator were subjective. He said this certification process lasted five days, but two involved NE#1 canceling, changing, or ending it early.

Deputy #2 said he offered his assistance to NE#1 and that his role was to coordinate the certification process as an active assistant, while NE#1 served as the sole evaluator. He said he also guarded the explosives since they needed to be secured. He described how NE#1 prepared the hides by placing them in unsealed boxes, allowing the odors to escape through the openings. Deputy #2 said he wore gloves while assisting NE#1 in preparing the hides, although he was unaware of any rules regarding glove usage. He said his agreement with NE#1 was to exclusively handle the target box (the one containing the explosive hide) to avoid contaminating the other cold boxes (the ones not containing the explosive hide) with odor. He acknowledged holding the target box with "contaminated" gloves, which raised concerns for NE#1, who believed this could cue the dogs to his scent. He disagreed with NE#1, asserting that the proper way to cue the dogs would have been to touch the target box with his bare hands, as the dogs were familiar with his scent. He said such action would have benefited the dogs, but he denied using bare hands. He acknowledged that a more effective method for preparing the explosive hide would have involved placing it in the box while wearing gloves, removing those gloves, putting on a new pair, and closing the box, but he believed this method would have been time-consuming. He also noted that he and NE#1 had differing perspectives on how to prepare the hides, which was common among certifiers.



Deputy #2 said he and NE#1 had agreed to switch the boxes they would handle—NE#1 would handle the “hot” boxes, while Deputy #2 would handle the “cold” boxes. He said he wore gloves while handling the cold boxes to prevent false readings. He said this change did not affect the dogs, and they still passed. He said he repositioned the boxes to their original locations after a team completed its evaluation but before the next team began its evaluation. He said the dogs often bumped into the boxes and moved them, which could signal to the subsequent team that some boxes were out of place, potentially indicating the target box. He said NE#1 observed him moving the boxes back into position using his feet, not hands, ensuring that the next team could be tested under similar conditions.

Deputy #2 acknowledged advising NE#1 to transfer passing scores from one day to another day if the dog failed on a certain day. He denied pressuring NE#1 to follow through on this suggestion. He believed NE#1, as the evaluator, had the discretion to exercise such a decision. He said one team benefited from this practice while another did not, leading him to conclude that the carryover approach promoted fairness among all teams. He acknowledged recommending NE#1 to adjust scores in cases where certain problems unfairly affected the teams, so these score adjustments would reflect corrected problems, such as environmental factors affecting the evaluation. He said they agreed to retest the boxes in a different room, resulting in successful outcomes for all dogs. He did not view this practice as unethical, as it enabled them to manage the testing conditions effectively. He believed the evaluator had the discretion to take such action.

Deputy #2 said the teams did not see him placing the boxes. He denied hinting at the location of the target box. He said the teams could retrain and request another certification if they failed, with no documentation submitted to the state indicating their failure. He denied intentionally moving an explosive hide to affect the certification results. He said he wanted the teams he trained to pass, viewing it as a matter of pride, but denied being pressured to influence the outcome. He said NE#1 worked slowly but proficiently and accurately.

### **C. OPA Interviews**

#### Named Employee #1

On November 26, 2024, OPA interviewed NE#1. He said he is a state canine certifier who assists agencies with the certification process. He said he evaluated canine and canine handlers. He said Deputy #2, a KCSO canine certifier, asked him to conduct a certification test for three KCSO canine teams. He said the certification dates included July 2 and 3, and August 6, 8, 9, and 14. He said the KCSO teams did not fulfill the minimum training hours required, so Deputy #2 asked whether NE#1 could postdate their certification to a time when they would have completed the necessary hours. NE#1 said he denied Deputy #2’s request. He said Deputy #2 was an observer, not a certifier, during the certification process.

NE#1 described multiple instances of behavior from Deputy #2 he found troubling. First, Deputy #2 placed a hide in a box while wearing gloves and then closed the box with the same gloves. NE#1 said this action could transfer the hide’s scent to the box, enabling a canine to detect it. Regardless, NE#1 said the teams struggled during the box test. Second, Deputy #2 covered a broken window with a tarp, claiming that the air currents from the window were affecting the testing environment. NE#1 interpreted this as Deputy #2’s attempt to alter testing conditions. NE#1 also said Deputy #2 asked whether failed test results could be discarded, a request NE#1 said he declined. Instead, NE#1 said he offered to conduct the tests in a different room. Third, the following day, Deputy #2 again used contaminated gloves to close boxes. NE#1 said he conducted another box search test in a different building in response to the previous day’s unsatisfactory performance. Fourth, Deputy #2 rearranged box placements after NE#1 already positioned them, which NE#1 said could cause the scents to move, making it easier for the canines to find the boxes.



Fifth, Deputy #2 used contaminated gloves while preparing for the vehicle search test, disregarding NE#1's explicit instructions.

NE#1 said he and Deputy #2 had a contentious discussion about training expectations. He said he told Deputy #2 that he would not selectively highlight findings to influence the certification process. He said he approved all but one canine team, as he believed they met the minimum certification standards.<sup>1</sup> He acknowledged giving the teams ample time during testing, emphasizing this discretion fell within his authority as an evaluator. He denied altering any test scores or compromising the integrity of the certification process. He said he upheld a high ethical standard and signed the certifications, which were supported by his reputation.

NE#1 acknowledged that, in retrospect, he should have been more proactive in monitoring Deputy #2's conduct. While he did not believe there was any intentional manipulation of the test during his initial observations, he reassessed his views after considering the overall context of Deputy #2's actions. NE#1 recalled speaking to his direct supervisor on or about August 15, 2024, and telling him that the certification had been "rough" and that he "didn't feel comfortable running certification for [Deputy #2] in the future" because of the "oddities" that had occurred. NE#1 characterized this conversation as not getting "into any details" with his immediate supervisor. NE#1 described subsequent conversations with Deputy #1 and Sergeant #1 around early September during which both encouraged him to report his concerns to CJTC. NE#1 said he reported the matter to his supervisors on September 19, 2024, after a union representative encouraged him to report it. He said he reported the incident to an SPD sergeant (Sergeant #2) and lieutenant (Lieutenant #1), giving them an "in-depth overview of what had gone on." NE#1 stated the Sergeant #2 informed him this fulfilled his reporting obligations.

#### CJTC Employees

On February 11 and 12, 2025, OPA interviewed two CJTC employees, who provided OPA with CJTC canine certification records in February 2025.<sup>2</sup> One CJTC employee said, in addition to the details specified in the CJTC certification forms, CJTC relies on certified canine evaluators for guidance regarding training aids.

#### Sergeant #2

On February 25, 2025, OPA interviewed Sergeant #2. He said NE#1 discussed the matter with him and Lieutenant #1. Sergeant #2 stated he has been a police officer for twenty-seven years, a sergeant on the bomb squad and in charge of detectives and canine handlers for SPD. Sergeant #2 stated NE#1 described the certification process in "great detail," explaining his belief that there were some discrepancies due to Deputy #2. Sergeant #2 recalled asking NE#1 whether there were any state standards governing the discrepancies causing him concern. Sergeant #2 stated NE#1 told him there were no standards. Sergeant #2's assessment of the situation was that NE#1 and Deputy #2 had a disagreement about the certification, but Sergeant #2 was unable to identify a standard that was violated. Because of this, Sergeant #2 felt there was nothing he could do at his level. He recommended NE#1 to collaborate with CJTC to develop such standards.

#### Lieutenant #1

On February 13, 2025, OPA interviewed Lieutenant #1. His statements were consistent with those of Sergeant #2. He stated NE#1 is an explosive ordinance detection handler for SPD's arson bomb squad and a certified trainer. He said NE#1 and Sergeant #2 came into his office.<sup>3</sup> NE#1 requested his permission to file a complaint with the CJTC about

<sup>1</sup> According to a certification form CJTC provided to OPA, NE#1 certified the canine teams on August 14, 2024.

<sup>2</sup> A record showed that a WSP trooper, listed as a certified canine evaluator, recertified the KCSO canine teams.

<sup>3</sup> NE#1's regular sergeant was not working on that day so Sergeant #2 was present.



Deputy #2. NE#1 told him he believed Deputy #2 cheated on his assessment as he believed Deputy #2 did something to the box that transferred the odor that is supposed to be inside the box outside the box. NE#1 indicated that this would make it easier for the canine to pick up on the odor. NE#1 also explained Deputy #2 moved the boxes. Lieutenant #1 asked if Deputy #2 violated any policy. Specifically, Lieutenant #1 asked, “are any of these standards written anywhere?” NE#1 told him, “no.” NE#1 said Deputy #2 did not violate a CJTC standard, but “it’s just a common practice to not do it.” Lieutenant #1 told NE#1 that, as the explosive detection ordinance certified expert, NE#1 would have to make the decision. Also, he told NE#1 that he should contact CJTC and fix the written standards so that “everybody knows what the ground rules are, that they can comply with them, because otherwise, this other handler, this might be his best practice, but you don’t know because you didn’t ask him.”

Furthermore, Lieutenant #1 said that, as a lay person, it didn’t sound to him like there’s anything here for a formal complaint, as the standards need to be fixed; however, NE#1 needed to decide if he wanted to file a complaint and could do so if he felt it was right. Lieutenant #1 did not believe NE#1 cheated, and this was a standards issue. He thought NE#1 was passive about Deputy #2’s behavior by not confronting Deputy #2 or stopping the test, but did not believe NE#1 tried to manipulate the certification process.

#### WSP Trooper

On February 25, 2025, OPA interviewed a WSP trooper, a certified explosive detection canine team evaluator. He said he tested and recertified the KCSO canine teams. He said CJTC lacks standards for evaluators regarding the placement of explosive hides but emphasized that evaluators should adhere to best practices. He said the way the hides are handled could offer an advantage to the canine. He said he evaluated the KCSO canine teams during the recertification process and observed some difficulties in certain areas, but he ultimately determined that they satisfied the minimum CJTC standards.<sup>4</sup>

#### **ANALYSIS AND CONCLUSIONS:**

##### **Named Employee #1 – Allegation #1**

##### ***5.001 – Standards and Duties, 5.001-POL-11. Employees Will Be Truthful and Complete in All Communication***

It was alleged that NE#1 was dishonest by altering or falsifying test scores to facilitate the certification of canine teams.

Department employees must be truthful and complete in all communications. SPD Policy 5.001-POL-11.

Under the Seattle Police Officers’ Guild Collective Bargaining Agreement (SPOG CBA), a sustained complaint involving dishonesty “relating to the administration of justice” carries a presumption of termination. SPOG CBA article 3.1. In such cases, dishonesty is defined as “intentionally providing false information, which the officer knows to be false, or intentionally providing incomplete responses to specific questions, regarding facts that are material to the investigation.” *Id.* Dishonesty means “more than mere inaccuracy or faulty memory.” *Id.* For termination cases where “the alleged offense is stigmatizing to a law enforcement officer,” an “elevated standard of review (i.e. – more than preponderance of the evidence)” applies. *Id.*

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<sup>4</sup> According to a certification form CJTC provided to OPA, this WSP trooper, along with a second WSP trooper, certified the KCSO canine teams on October 26, 2024.





There is insufficient evidence to find that NE#1 acted dishonestly by certifying the KCSO canines or allowing the certification testing to proceed. Deputy #1's written statement expressed concern about Deputy #2's conduct during the certification process, alleging NE#1 may have been complicit in Deputy #2's request for test score adjustments and his manipulations of testing conditions. Also, Deputy #1 and NE#1 both spoke to how conflicted NE#1 felt about reporting his concerns.

Conversely, NE#1 denied altering or falsifying test scores, and there is insufficient evidence to dispute NE#1's denial. Deputy #2 never suggested that NE#1 was dishonest during the certification process. To the contrary, Deputy #2 believed NE#1 to be slow, methodical, proficient, and accurate. The evidence showed that NE#1 disapproved of Deputy #2's conduct, as he refused Deputy #2's request to adjust test scores, admonished Deputy #2 for his glove use during the box test, engaged in a contentious discussion with Deputy #2 about training expectations, consulted with Deputy #1 and Sergeant #1, and—ultimately—reported the matter to his superiors. Also, despite his reservations about Deputy #2's behavior, NE#1's overall assessment of the KCSO canines was that they met the minimum standards for certification when he issued the certification on August 14, 2024. This was partially corroborated when two WSP troopers retested the KCSO canine teams without the alleged interferences and reached the same conclusions as NE#1, albeit two and a half months later. Overall, OPA cannot find that NE#1 acted dishonestly.

OPA recognizes that Washington State and CJTC have promulgated standards for certifying canines.<sup>5</sup> But NE#1, Deputy #2, the WSP Trooper, Sergeant #2, and Lieutenant #1 all spoke to ambiguities in written testing standards and procedures. These ambiguities were a core issue in this case and NE#1's conflicted assessment in the certification of the KCSO canines. This became apparent when NE#1 and Deputy #2 had diverging views regarding the placement and handling of the explosive hides, and what time constraints or leeway was permitted for testing canines over time. Given these issues, SPD should collaborate with other agencies and CJTC to review the written standards for the certification of explosive detection canines, including the expectations and procedures for certification testing overall as well as certifiers and observers. Where necessary, SPD should collaborate with other agencies and CJTC to establish clearer standards for canine certifiers.

Accordingly, OPA recommends this allegation be Not Sustained – Management Action.

- **Management Action:** SPD should collaborate with other agencies and CJTC to review the written standards for the certification of explosive detection canines,<sup>6</sup> including the expectations and procedures for certification testing overall as well as certifiers and observers. Where necessary, SPD should collaborate with other agencies and CJTC to establish clearer standards for canine certifiers.

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

<sup>5</sup> See WAC 139-05-915; CJTC Canine Certification, available at <https://cjtc.wa.gov/certification/canine-certification>; and CJTC Scoresheet Packet Explosive Canine Team, available at <https://cjtc.wa.gov/sites/default/files/2024-06/scoresheet-for-explosive-detection-dog-team-canine-performance-standards-%28effective-01-01-2020%29.pdf>.

<sup>6</sup> This case and Management Action Recommendation concern explosive detection canines. However, SPD and CJTC may consider reviewing the written standards for testing all canine disciplines.



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**Named Employee #1 – Allegation #2**

***5.001 – Standards and Duties, 5.001-POL-10. Employees Will Strive to be Professional***

It was alleged that NE#1 undermined public trust in himself and SPD through his conduct during the certification process.

SPD employees must “strive to be professional.” SPD Policy 5.001-POL-10. Further, “employees may not engage in behavior that undermines public trust in the Department, the officer, or other officers,” whether on or off duty. *Id.*

There was insufficient evidence to indicate that NE#1 undermined public trust in the certification process. NE#1 said he gave the canine teams ample time during the examination, particularly as the teams faced difficulties with the box test. This judgment was both reasonable and within NE#1’s discretion as an evaluator. Although the examination spanned several days, as opposed to a single day, there were no established rules or standards restricting the length of the evaluation. As NE#1 and Deputy #2 noted, the certifier had considerable discretion in evaluating the canine teams, even if this resulted in a certification process that took longer than anticipated.

There was also no evidence that NE#1 altered test scores or showed favorable treatment. Instead, the evidence showed that NE#1 objected to Deputy #2’s actions and was sufficiently troubled that he eventually discussed his concerns to Deputy #1, Sergeant #1, and two SPD supervisors. NE#1’s and Deputy #2’s statements suggested that they were able to reconcile their differences and proceed with the certification process. NE#1 maintained that he still certified the canine teams, despite his concerns about Deputy #2’s behavior, because he believed the canines met the minimum standards. The validity of NE#1’s certification was partially corroborated later when two WSP troopers retested the same canine teams and recertified them. Overall, OPA found insufficient evidence to suggest that NE#1’s actions and inaction undermined public trust in the certification process.

That said, OPA shares many of the concerns expressed by Lieutenant #1. Both NE#1 and Deputy #2 are highly- trained canine handlers and state certifiers. If the two disagreed about a testing process or standard during the certification, the appropriate authority to resolve the dispute would be CJTC. If NE#1 had concerns about how Deputy #2’s actions could affect the certification process, then as the certifier he should have sought guidance from CJTC *before* certifying the canine teams. Instead, NE#1 responded passively and expressed concerns to Sergeant #1, Deputy #1, a union representative, his direct supervisor, Sergeant #2, and Lieutenant #1. NE#1’s reaction to this situation played a role in the need for WSP to recertify the canine teams and a possible CJTC review. OPA is recommending NE#1’s chain of command provide training and counseling for NE#1 through the below training referral.

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

- **Training Referral:** NE#1’s chain of command should discuss OPA’s findings with NE#1, review SPD Policy 5.001-POL-10 with NE#1, and provide any further retraining and counseling that it deems appropriate. This retraining and counseling must include some combination of topics in conflict resolution, reporting requirements, active bystander situations, or other relevant topics emphasizing the importance of timely addressing concerns and conflict in the moment. The retraining and counseling conducted should be documented in Blue Team.

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