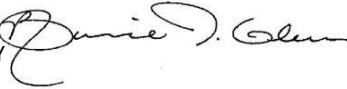




CLOSED CASE SUMMARY

ISSUED DATE: SEPTEMBER 15, 2025

FROM: INTERIM DIRECTOR BONNIE GLENN
OFFICE OF POLICE ACCOUNTABILITY 

CASE NUMBER: 2025OPA-0120

Allegations of Misconduct & Director’s Findings

Named Employee #1

Allegation(s):		Director’s Findings
# 1	5.001 – Standards and Duties, 5.001-POL-10. Employees Will Strive to be Professional	Not Sustained - Unfounded
# 2	5.001 – Standards and Duties, 5.001-POL-2. Employees Must Adhere to Laws, City Policy, and Department Policy	Not Sustained - Unfounded
# 3	5.001 – Standards and Duties, 5.001-POL-18. Employees Must Avoid Conflicts of Interest	Not Sustained - Unfounded

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), a General Investigations Unit (GIU) detective, was familiar with Community Member #1 (CM#1), the subject of an investigation being jointly conducted by the Seattle Police Department (SPD) and the Federal Bureau of Investigation (FBI). NE#1 contacted CM#1 during her investigation into a possible financial crime he may have committed. OPA investigated whether NE#1’s conduct was unprofessional, violated the law, and constituted a conflict of interest.

ADMINISTRATIVE NOTE:

On August 4, 2025, the Office of Inspector General certified OPA’s investigation as thorough, timely, and objective.

SUMMARY OF INVESTIGATION:

OPA’s investigation included reviewing an SPD memorandum, incident and supplement reports, email correspondence, and interview statements from an FBI special agent, an SPD acting sergeant, and NE#1.

A. SPD Memorandum

On February 19, 2025, SPD’s deputy chief emailed OPA a memorandum authored by the Complainant, an acting police captain. Dated February 18, 2025, the memorandum stated that SPD and the FBI were conducting a joint investigation when the FBI learned that NE#1 might have contacted CM#1—the subject under investigation for allegedly committing a financial crime—and shared details of the investigation with him. The memorandum stated that NE#1 was the detective assigned to the case, acquainted with CM#1, informed him of the financial crime allegation, and advised him



of the need to provide pertinent receipts. The memorandum stated that the FBI was investigating whether NE#1 had committed a crime and the extent of NE#1's involvement.

B. Incident and Supplement Reports

On January 26, 2025, an SPD officer prepared an incident report detailing his response to a school, where an employee informed him about a possible financial crime committed by CM#1. The incident report stated that the officer referred this matter to the appropriate follow-up unit.

On April 2, 2025, NE#1 prepared a supplement report detailing her investigation into this alleged crime. The following entries detailed NE#1's contacts with CM#1:

01/31/25 0915 I phoned [CM#1] ... as I am familiar with him and his family, to let him know I was assigned to conduct the follow up investigation for allegations of misconduct against him. He was surprised he was named as a person of interest in a criminal investigation around his basketball academy. He said no one from the school district has contacted him and that he has paperwork for all the invoices he's billed since starting his academy. I asked him to send those to me and he said he would do so the following week as he had to get them from the ... accounting office. He asked what else he needed to do to clear his name and I told him at some point I would request a written statement, but I wanted him to consult with an attorney prior to submitting his statement, should he decide to do so.

...

02/03/25 1011 I spoke with [CM#1], and he explained he would be emailing me documentation from [an executive director for an athletic club].

...

03/31/25 1839 ... [CM#1] has continually reached out to me to see if there was any update and ask if there was anything else he could submit that would assist with proving his innocence.

NE#1's supplement report concluded, "I am, therefore, closing this investigation due to lack of sufficient evidence of a crime."

C. OPA Interviews

FBI Special Agent

On April 9, 2025, OPA interviewed an FBI special agent. He said SPD and the FBI were conducting a joint investigation when the FBI learned that NE#1 contacted CM#1, the subject of their investigation. He believed NE#1 received an anonymous report of a crime and subsequently contacted CM#1. He said NE#1 appeared to have a personal relationship with CM#1, although the nature of that relationship could not be disclosed. He said the FBI investigated



whether NE#1 had committed a crime but concluded on April 4, 2025, that no action would be taken. He said the FBI had concerns about NE#1's failure to disclose a potential conflict of interest.

SPD Acting Sergeant

On July 2, 2025, OPA interviewed an SPD acting sergeant. She said she is assigned to GIU. She said NE#1 works under her supervision. She recalled that this case had been inactive until NE#1 requested it after someone from the school contacted her. She said she assigned the case to NE#1. She said she was unaware of any personal relationship between NE#1 and CM#1 but recalled NE#1 being acquainted with someone from the school, which motivated NE#1's interest in reviewing the case. She was unable to recall any conversations with NE#1 about CM#1 or the case. She said GIU would consult with NE#1 regardless since NE#1 was considered an expert in financial crimes. She said it is standard procedure to contact a suspect and advise him or her to seek legal counsel before providing a statement or evidence, especially if a detective aims for that evidence to be admissible in court. She said NE#1's mere acquaintance with CM#1 would have been an insufficient reason to reassign the case since NE#1 was familiar with everyone in the school district and had been around for a while. She said she would have investigated further into the nature of NE#1's relationship with CM#1 and would have considered reassigning NE#1 if the personal relationship had been significant, such as a friendship or romantic involvement.

Named Employee #1

On July 8, 2025, OPA interviewed NE#1. NE#1 said she is assigned to GIU and is currently its sole fraud investigator, which means that all fraud-related cases are assigned to her. NE#1 recalled the acting sergeant assigning her the case instead of requesting the case herself. NE#1 said she informed the acting sergeant of her acquaintance with CM#1, as he played basketball with her sons. NE#1 elaborated that her familiarity with CM#1 and his parents stemmed from their connections through school and sports. NE#1 said this familiarity was not an issue for her, as she had previously investigated several cases involving suspects she knew, just like this one. NE#1 said she instinctively tells her supervisor if she is familiar with a suspect in the event the case needs to be reassigned. NE#1 noted that no other GIU detective would have been qualified to handle this financial case. NE#1 also noted her extensive experience working in the school as a school resource officer and with youth sports, allowing her to know many people in the community. NE#1 denied having a personal relationship with CM#1 or his parents, as they never interacted outside of sporting events. NE#1 described her relationship with CM#1 as casual.

NE#1 said she called CM#1, told him about the alleged charges against him, and requested that he send all financial records to her. NE#1 said CM#1 complied; however, she found no reason to proceed with the investigation since CM#1 appeared to be only marginally related to the overall investigation, and the school was not cooperative in supplying records to her. NE#1 said she consistently informs subjects of their rights when contacting them and advises them to consult with an attorney, as they are under no obligation to speak to her. NE#1 said she was unable to recall which supervisor she spoke with on this case. NE#1 denied awareness of a federal investigation concerning CM#1.

ANALYSIS AND CONCLUSIONS:

Named Employee #1 – Allegation #1

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

OPA alleged that NE#1 undermined public trust in the Department and herself.



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’s conduct undermined public trust in the Department and herself. NE#1 clearly disclosed in her supplement report her familiarity with CM#1 and her advising CM#1 of his right to legal counsel. The acting sergeant found no reason to object to NE#1’s involvement with the investigation, especially since she was GIU’s sole fraud investigator. Overall, the evidence indicated no intention on NE#1’s part to conceal her familiarity with CM#1 or to circumvent CM#1’s right against self-incrimination. Thus, OPA finds this allegation unfounded.

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

Recommended Finding: **Not Sustained – Unfounded**

Named Employee #1 – Allegation #2

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

OPA alleged that NE#1 violated the law by contacting the subject of an active investigation.

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

As noted above, NE#1’s contact with CM#1 was legitimate, provided she informed him of his legal rights, including the right to remain silent, the right to decline participation in her investigation, and the right to obtain legal representation. Based on NE#1’s supplement report and interview statements, there was no evidence suggesting that NE#1 failed to inform CM#1 of his rights or attempted to circumvent them. The acting sergeant also pointed out that it is standard procedure to contact a suspect and advise him or her to seek legal counsel before providing a statement or evidence. Overall, OPA found no evidence indicating impropriety in NE#1’s contact with CM#1.

Additionally, there were concerns that NE#1 might have improperly shared details of the investigation with CM#1. While NE#1 discussed the investigation with CM#1, the intent behind this communication was to inform CM#1 about his possible criminal charges and to request financial records from him to prove his innocence, should he choose to participate. NE#1 subsequently documented all her contacts with CM#1 in a supplement report, undermining claims of criminal intent. There was no evidence suggesting that NE#1 compromised the investigation or contacted CM#1 to give him an unfair advantage unafforded to other suspects. Overall, OPA does not find NE#1 violated any law, city or SPD policy and reaches the same conclusion as that reached by the FBI: NE#1 did not commit any crime.

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

Recommended Finding: **Not Sustained – Unfounded**

Named Employee #1 – Allegation #3

5.001 – Standards and Duties, 5.001-POL-18. Employees Must Avoid Conflicts of Interest

OPA alleged that NE#1 failed to avoid a conflict of interest by investigating a subject with whom she has a personal relationship.



Department employees must avoid conflicts of interest. SPD Policy 5.001-POL-18. Employees will not engage in enforcement, investigative, or administrative functions that create or give the appearance of conflicts of interest. *Id.* Employees will not investigate events where they are involved. *Id.* This also applies where any person with whom the employee has a personal relationship is involved in the event. *Id.*

Although NE#1 characterized her relationship with CM#1 as casual and expressed familiarity with CM#1 and his parents through school and sports, the fact remained that NE#1 had some form of relationship with CM#1, even at an acquaintance level. Investigating a subject with such a relationship could create the appearance of a conflict of interest. OPA recognizes that NE#1 was well-connected in the community through sports and school. OPA also credits NE#1 for documenting in her supplement report that she was familiar with CM#1.

NE#1 may want to consider in the future, to avoid a conflict of interest and/or the appearance of one, to screen a potential conflict with a supervisor in writing and document the outcome of that screening in writing. This is particularly important given the discrepancies in recollections regarding the screening here. Overall, based on the evidence provided by a preponderance of the evidence, OPA does not find misconduct under these circumstances.

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

Recommended Finding: **Not Sustained – Unfounded**