



# SEATTLE CITY COUNCIL

## Public Safety Committee

### Agenda

Tuesday, May 13, 2025

9:30 AM

Council Chamber, City Hall  
600 4th Avenue  
Seattle, WA 98104

Robert Kettle, Chair  
Rob Saka, Vice-Chair  
Joy Hollingsworth, Member  
Cathy Moore, Member  
Sara Nelson, Member

Chair Info: 206-684-8807; [Robert.Kettle@seattle.gov](mailto:Robert.Kettle@seattle.gov)

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# SEATTLE CITY COUNCIL

## Public Safety Committee

### Agenda

May 13, 2025 - 9:30 AM

#### Meeting Location:

Council Chamber, City Hall , 600 4th Avenue , Seattle, WA 98104

#### Committee Website:

<https://www.seattle.gov/council/committees/public-safety>

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This meeting also constitutes a meeting of the City Council, provided that the meeting shall be conducted as a committee meeting under the Council Rules and Procedures, and Council action shall be limited to committee business.

Members of the public may register for remote or in-person Public Comment to address the Council. Details on how to provide Public Comment are listed below:

Remote Public Comment - Register online to speak during the Public Comment period at the meeting at

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Online registration to speak will begin one hour before the meeting start time, and registration will end at the conclusion of the Public Comment period during the meeting. Speakers must be registered in order to be recognized by the Chair.

In-Person Public Comment - Register to speak on the Public Comment sign-up sheet located inside Council Chambers at least 15 minutes prior to the meeting start time. Registration will end at the conclusion of the Public Comment period during the meeting. Speakers must be registered in order to be recognized by the Chair.

Pursuant to Council Rule VI.C.10, members of the public providing public comment in Chambers will be broadcast via Seattle Channel.

Please submit written comments to all Councilmembers four hours prior to the meeting at [Council@seattle.gov](mailto:Council@seattle.gov) or at Seattle City Hall, Attn: Council Public Comment, 600 4th Ave., Floor 2, Seattle, WA 98104.

*Please Note: Times listed are estimated*

**A. Call To Order**

**B. Approval of the Agenda**

**C. Public Comment**

**D. Items of Business**

1.     [CB 120977](#)     **AN ORDINANCE** relating to oversight of the police; revising the process for investigating complaints naming the Chief of Police; adding new Sections 3.29.515 and 3.29.590 to the Seattle Municipal Code; and amending Sections 3.29.510, 3.29.520, 3.29.530, 3.29.560, and 3.29.570 of the Seattle Municipal Code.

Supporting Documents:

[Summary and Fiscal Note](#)

[Central Staff Presentation](#)

[Central Staff Memo](#)

**Briefing and Discussion** (45 minutes)

**Presenters:** Lisa Judge, Inspector General, Office of the Inspector General (OIG); Bonnie Glenn, Acting Director, Office of Police Accountability (OPA); Karina Bull, Council Central Staff

2.                   **StarChase Technology Briefing**

Supporting Documents:

[Presentation](#)

**Briefing and Discussion** (30 minutes)

**Presenter:** Captain James Britt, Seattle Police Department

**E. Adjournment**



Legislation Text

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**File #:** CB 120977, **Version:** 1

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**CITY OF SEATTLE**

**ORDINANCE \_\_\_\_\_**

**COUNCIL BILL \_\_\_\_\_**

AN ORDINANCE relating to oversight of the police; revising the process for investigating complaints naming the Chief of Police; adding new Sections 3.29.515 and 3.29.590 to the Seattle Municipal Code; and amending Sections 3.29.510, 3.29.520, 3.29.530, 3.29.560, and 3.29.570 of the Seattle Municipal Code. WHEREAS, in 2017, Ordinance 125315 (Accountability Ordinance) established the City's three-pronged

police oversight system to ensure the delivery of police services to the people of Seattle in a manner that fully complies with the Constitution and laws of the United States and the State of Washington, effectively ensure public and officer safety, and promote public confidence in the Seattle Police Department (SPD); and

WHEREAS, the Accountability Ordinance strengthened elements of the City's existing system, clarifying and establishing the roles of the Office of Police Accountability (OPA) as an independent, civilian-led investigative office organizationally within SPD, the Office of Inspector General for Public Safety (OIG) as an independent office separate from the Executive, and the Community Police Commission (CPC) as a strong community-based oversight commission; and

WHEREAS, the OPA ensures that the actions of SPD employees are lawful and in compliance with SPD policies by initiating, receiving, classifying, investigating, and making findings related to misconduct complaints involving SPD employees; and

WHEREAS, the OIG provides civilian auditing of the management, practices, and policies of SPD and OPA by reviewing OPA's handling of misconduct complaints and any activities that could involve potential conflicts of interest; actions of possible fraud, waste, abuse, inefficiency, or ineffectiveness; undermine

accountability or be unethical, or otherwise compromise the public's trust in the criminal legal system; and

WHEREAS, the CPC engages the community to develop recommendations on the police accountability system, including but not limited to reviewing closed OPA investigations to identify opportunities for systemic improvements; and

WHEREAS, the Accountability Ordinance established standards and procedures for investigating misconduct complaints involving SPD employees, but did not contemplate a process for ensuring that misconduct complaints naming the Chief of Police would be handled in a fair and transparent manner, free of potential conflicts of interest; and

WHEREAS, in 2022, Ordinance 126628 established a specific process for OPA's handling of complaints naming the Chief of Police, including but not limited to (1) conducting comprehensive intake investigations (intakes) for every complaint; (2) requiring civilian supervisors to conduct intakes; (3) recommending classification determinations on whether and how to proceed with investigations; (4) determining whether a City entity (i.e., OPA or the Seattle Department of Human Resources) or non-City entity will perform investigations depending on the presence of real or potential conflicts of interest and type of allegation(s); and (5) assigning civilian staff to perform investigations; and

WHEREAS, Ordinance 126628 also established an oversight role for OIG in the handling of complaints naming the Chief of Police, including but not limited to (1) receiving notice of complaints; (2) reviewing and auditing intakes and investigations; (3) finalizing classification determinations; and (4) providing notifications to identified City entities and the complainant; and

WHEREAS, a lasting police oversight system benefits from an ongoing practice of re-examining and improving internal processes; and

WHEREAS, since Ordinance 126628 went into effect in August 2022, the OPA has received over 70 complaints naming the Chief of Police; and

WHEREAS, the current process for handling these complaints challenges OPA's ability to operate in an efficient and timely manner by restricting intake staff to two supervisors and requiring a full examination of all complaints regardless of the content or allegations, and also includes limited reporting requirements; and

WHEREAS, the City Council intends to streamline and clarify this process to provide staffing flexibility, support procedural efficiency, and increase transparency to strengthen the City's oversight system of SPD and obtain the trust and confidence of the community; NOW, THEREFORE,

**BE IT ORDAINED BY THE CITY OF SEATTLE AS FOLLOWS:**

Section 1. Section 3.29.510 of the Seattle Municipal Code, enacted by Ordinance 126628, is amended as follows:

**3.29.510 OPA intake, classification, and investigation scoping**

A. If the Chief of Police is named in a complaint, the initial screening process shall include the immediate creation of a case file and the immediate notification of the OPA Director or the OPA Director's civilian appointed designee.

B. If the Chief of Police is named in a complaint, OPA shall notify OIG as soon as is practicable, but within 30 calendar days. OIG will ensure that OPA is pursuing its intake investigation (intake) without unnecessary delay. In the event that OIG determines that unnecessary delay is occurring, OIG shall promptly notify the President of the City Council, the Chair of the Council's public safety committee, and the complainant. Notification shall consist of: (1) the nature of the complaint, (2) the date the complaint was initiated or received, and (3) an explanation of why OIG has determined that unnecessary delay is occurring.

~~((C. A civilian investigator supervisor shall be assigned to complete the intake of the complaint, which shall consist of a thorough examination of the complaint and available information to determine whether an investigation should be conducted. This examination shall be designed to answer relevant factual questions and ensure the collection and preservation of time-sensitive evidence and, when possible, it will include an~~

interview with the complainant.))

C. Following the initial screening and notification to OIG, OPA shall conduct an intake of the complaint or, with OIG's agreement, close the complaint as a contact log.

D. If OPA opens an intake, the OPA Director shall assign a civilian of appropriate skill, training, and experience to complete the intake of the complaint, which shall consist of a thorough examination of the complaint and available information to determine whether an investigation should be conducted. The intake shall be designed to answer relevant factual questions and ensure the collection and preservation of time-sensitive evidence and, when possible, include an interview with the complainant.

~~((D.))~~ E. OPA shall consult with OIG ~~((when examining a complaint))~~ during the intake, with the goals of determining: (1) whether any laws or SPD policies would have been violated if the alleged actions are later proven to be true; and (2) whether criminal charges could result if the alleged actions are later proven to be true. ~~((This examination))~~ The intake shall result in OPA's classification of the complaint for investigation, or as a contact log, as appropriate.

~~((E.))~~ F. If the OPA Director determines, upon conclusion of the ~~((examination))~~ intake, that investigation is appropriate, they will determine:

1. Whether OPA, the Seattle Department of Human Resources (SDHR), or a non-City entity under subsection 3.29.540.C will perform the investigation. In making this determination OPA shall consider and document whether there are any conflicts of interest, real or potentially perceived, that could undermine the public trust if the investigation is conducted by OPA or SDHR; and

2. Whether the investigation could result in a finding of a violation or violations of local, state, or federal anti-discrimination laws and/or any applicable City and/or SPD policies that prohibit harassment and/or discrimination.

~~((F.))~~ G. If the OPA Director or a designee of the Director determines that the intake warrants an investigation, then the Director or designee shall work with the ~~((assigned))~~ civilian ~~((investigator supervisor))~~



assigned to the intake to prepare an investigative plan that includes, at a minimum, information that will be necessary in the case that OIG must issue a request for proposal for an investigation by a non-City entity.

Section 2. A new Section 3.29.515 is added to the Seattle Municipal Code as follows:

**3.29.515 OIG intake during an ongoing investigation**

If a complaint arises against the Chief of Police or an unrepresented SPD employee during an ongoing investigation managed by OIG and there is a sufficient nexus to the ongoing investigation, OIG shall notify OPA as soon as is practicable, but within 30 calendar days. Notification shall consist of: (1) the nature of the complaint; (2) whether OIG has determined that OIG will manage the new case and initiate an investigation to maintain the integrity of the entirety of the matter; and, if applicable, (3) the OIG case number. OIG’s determination for the complaint is definitive.

Section 3. Section 3.29.520 of the Seattle Municipal Code, enacted by Ordinance 126628, is amended as follows:

**3.29.520 OIG review of OPA intake, classification, and investigation scoping**

A. OIG shall conduct a review of OPA’s intake investigation and classification to ensure that (1) the intake investigation was timely, thorough, and ~~((neutral))~~ objective, and (2) OIG concurs with the classification determination.

\* \* \*

C. If investigation is appropriate, OIG shall review the OPA recommendation on whether that investigation should be (1) conducted by either OPA or SDHR; or (2) conducted by a non-City entity under subsection 3.29.540.C. OIG shall then determine whether it concurs with OPA’s recommendations. In making this determination, OIG shall consider the factors in subsection ~~((3.29.510.E.1))~~ 3.29.510.F.1. If OIG and OPA do not concur, the OIG determination shall prevail and shall be considered definitive for the complaint.

\* \* \*

E. If OPA has determined the investigation could result in a finding of a violation or violations of local,

state, or federal anti-discrimination laws and/or any applicable City and/or SPD policies that prohibit harassment and/or discrimination, then OIG shall review the OPA recommendation on whether the investigation should be conducted by SDHR or by a non-City entity under subsection 3.29.540.C. OIG shall then determine whether it concurs with OPA's recommendations. In making this determination, OIG shall consider the factors in subsection ~~((3.29.510.E.1))~~ 3.29.510.F.1. If OIG and OPA do not concur, the OIG determination shall prevail and shall be considered definitive for the complaint.

\* \* \*

Section 4. Section 3.29.530 of the Seattle Municipal Code, enacted by Ordinance 126628, is amended as follows:

**3.29.530 ((Notification)) OIG notification and reporting on classification and investigation**

A. Where the classification determination is a contact log, OIG shall include the finding in its annual report required under Subchapter II of this Chapter 3.29. No other notification or reporting is required for this classification.

B. When an investigation will be:

1. Conducted by OPA or SDHR, OIG shall ~~((immediately))~~ promptly notify the Mayor, the President of the City Council, the Chair of the Council's public safety committee, the Executive Director and Co-Chairs of the Community Police Commission, the City Attorney, the City Director of Human Resources, and the complainant. Notification shall consist of: (1) the classification type; (2) whether OPA or SDHR will conduct the investigation; and (3) the rationale for the determination as supported by the factors in subsection ~~((3.29.510.E.1))~~ 3.29.510.F.1.

2. Conducted by a non-City entity, OIG shall ~~((immediately))~~ promptly notify the entities listed in subsection 3.29.530.B.1. Notification by OIG pursuant to this subsection 3.29.530.B.2 shall consist of: (1) the classification type; (2) the non-City entity by whom OIG has determined, either solely or with the concurrence of OPA, that the investigation be conducted; and (3) the rationale for the determination as

supported by the factors in subsections (~~(3.29.510.E.1 and 3.29.510.E.2)~~) 3.39.510.F.1 and 3.29.510.F.2.

C. Notification pursuant to this Section 3.29.530 shall include no more information than would otherwise be available to the public on the OPA website, so as not to compromise the integrity of the investigation.

Section 5. Section 3.29.560 of the Seattle Municipal Code, enacted by Ordinance 126628, is amended as follows:

**3.29.560 OIG review and notification of the intake investigation, classification, and investigation standards**

A. OIG shall (~~(immediately)~~) promptly notify the entities listed in subsection 3.29.530.B.1 if it: (1) is unable to determine whether the OPA intake was timely, thorough, and (~~(neutral)~~) objective or if it determines that the OPA intake was not timely, thorough, and objective; or (2) disagrees with the OPA Director's classification decision.

B. OIG shall conduct a review of any completed investigation, consistent with the requirements of Section 3.29.260, to determine whether the investigation was timely, thorough, and (~~(neutral)~~) objective.

C. To determine whether any completed investigation was timely, thorough, and (~~(neutral)~~) objective, OIG shall retain the authority to access any investigative materials that will support making the determination.

D. OIG shall (~~(immediately)~~) promptly notify the entities listed in subsection 3.29.530.B.1 if it is unable to determine whether an investigation was timely, thorough, and (~~(neutral)~~) objective or if it determines that an investigation was not timely, thorough, and (~~(neutral)~~) objective. In such case, OIG shall choose a new non-City entity to perform a new investigation.

Section 6. Section 3.29.570 of the Seattle Municipal Code, enacted by Ordinance 126628, is amended as follows:

**3.29.570 Transmittal of investigative results**

A. For any investigation completed by OPA, upon determination by OIG that the investigation was

timely, thorough, and ((neutral)) objective, OPA will transmit the investigation file and findings to the Mayor.

B. For any investigation completed by SDHR, upon determination by OIG that the investigation was timely, thorough, and ((neutral)) objective, OIG will transmit the investigation and findings, as determined by SDHR, to the Mayor.

C. For any investigation conducted by a non-City entity, upon determination by OIG that the investigation was timely, thorough, and ((neutral)) objective, OIG will transmit the investigation and findings, as determined by the non-City entity, to the Mayor

Section 7. A new Section 3.29.590 is added to the Seattle Municipal Code as follows:

**3.29.590 OIG reporting**

A. OIG shall include information on complaints, intakes, and/or investigations naming the Chief of Police in quarterly reports to the Mayor, the President of the Council, and the Chair of the Council’s public safety committee. The reports shall include information for the prior quarter and year to date, as follows:

1. The number of complaints initiated or received by the OPA and OIG;
2. The number of complaints closed as a contact log;
3. The number of complaints with completed intakes;
4. The number of complaints remaining open;
5. The number of opened and completed investigations; and
6. The number and percentage of intakes and investigations that OIG was unable to determine

were timely, thorough, and objective, or that OIG determined were not timely, thorough, and objective.

B. OIG shall include information on complaints, intakes, and/or investigations naming the Chief of Police in its annual report, required under Subchapter II of this Chapter 3.29. The annual report shall include information listed in subsection 3.29.590.A.1 through 3.29.590.A.6 for the prior calendar year.

Section 8. This ordinance shall take effect as provided by Seattle Municipal Code Sections 1.04.020 and 1.04.070.

Passed by the City Council the \_\_\_\_\_ day of \_\_\_\_\_, 2025, and signed by  
me in open session in authentication of its passage this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_

President \_\_\_\_\_ of the City Council

Approved / returned unsigned / vetoed this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_

Bruce A. Harrell, Mayor

Filed by me this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_

Scheereen Dedman, City Clerk

(Seal)

## SUMMARY and FISCAL NOTE

<b>Department:</b>	<b>Dept. Contact:</b>	<b>CBO Contact:</b>
LEG	Karina Bull/ 206-715-2460	N/A

### **1. BILL SUMMARY**

**Legislation Title:** AN ORDINANCE relating to oversight of the police; revising the process for investigating complaints naming the Chief of Police; adding new Sections 3.29.515 and 3.29.590 to the Seattle Municipal Code; and amending Sections 3.29.510, 3.29.520, 3.29.530, 3.29.560, and 3.29.570 of the Seattle Municipal Code.

**Summary and Background of the Legislation:** In 2017, Ordinance 125315 (Accountability Ordinance) established the City’s three-pronged police oversight system to (1) ensure that police services are delivered to the people of Seattle in a manner that fully complies with the Constitution and laws of the United States and the State of Washington; (2) ensure public and officer safety; and (3) promote public confidence in the Seattle Police Department (SPD).

In this system, the roles of the three accountability agencies, the Office of Police Accountability (OPA), the Office of Inspector General for Public Safety (OIG), and the Community Police Commission (CPC), are as follows:

- The OPA is an independent, civilian-led office within SPD that investigates misconduct complaints involving SPD employees to ensure that the actions of SPD employees are lawful and in compliance with SPD policies;
- The OIG is an independent office separate from the Executive that reviews and audits the management, practices, and policies of SPD and OPA, including OPA’s handling of misconduct complaints; and
- The CPC is a community-based oversight commission that reviews closed OPA investigations and engages the community to develop recommendations on the police accountability system and identify opportunities for systemic improvements.

Although the Accountability Ordinance established standards and procedures for investigating misconduct complaints involving SPD employees, the ordinance did not contemplate a process for ensuring that misconduct complaints naming the Chief of Police would be handled in a fair and transparent manner, free of potential conflicts of interest.

In 2022, Ordinance 126628 created a specific process for OPA’s investigation of complaints naming the Chief of Police, including but not limited to: (1) conducting comprehensive intake investigations (intakes) for every complaint; (2) requiring civilian supervisors to conduct intakes; (3) recommending classification determinations on whether and how to proceed with investigations; (4) determining whether a City entity (i.e., OPA or the Seattle Department of Human Resources) or non-City entity would perform investigations depending on the presence

of real or potential conflicts of interest and type of allegation(s); and (5) assigning civilian staff to perform investigations.

This process also created an oversight role for the OIG including but not limited to: (1) receiving notice of complaints; (2) reviewing and auditing intakes and investigations to ensure compliance with certain standards, (3) finalizing classification determinations; and (4) providing notifications to City entities and the complainant.

Since Ordinance 126628 went into effect in July 2022, OPA has received over 70 complaints naming the Chief of Police. After almost three years of implementation, several aspects of the investigative process have emerged as limiting the ability of OPA and OIG to operate in a timely, efficient, and accountable manner. For example:

- OPA must conduct a comprehensive intake for every complaint regardless of the content or allegations, including complaints that do not allege a plausible violation or present issues that have already been reviewed or adjudicated;
- OPA supervisors must conduct intakes although there are other qualified staff members (e.g., four civilian investigators) who could perform this work;
- There is not an established procedure for handling new complaints that arise during ongoing investigations managed by OIG; and
- There are limited reporting requirements.

This legislation would amend Ordinance 126628 with the intention of streamlining and clarifying the intake and investigation process to provide staffing flexibility, support procedural efficiency, and increase transparency.

These amendments would:

- Allow OPA, with OIG's agreement, to close certain complaints as a *contact log* after an initial screening;<sup>1</sup>
- Allow OPA to assign non-supervisory, civilian staff to intakes;
- Allow OIG to initiate and manage the investigation of a new complaint that arises during an ongoing investigation managed by OIG if there is a sufficient nexus between the new complaint and the ongoing investigation;
- Establish a consistent requirement for OIG to *promptly* provide notifications to City entities and the complainant;<sup>2</sup>
- Clarify that investigations must be timely, thorough, and *objective*;<sup>3</sup> and
- Require OIG to provide information on complaints, intakes, and investigations in quarterly reports for the Mayor, the President of the Council, and the Chair of the Council's public safety committee, and in its annual report for the general public.

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<sup>1</sup> Under Ordinance 126628, a *contact log* is a type of classification that resolves a complaint without an investigation. This classification includes circumstances when: (a) the complaint does not involve a potential policy violation by an SPD employee; (b) there is insufficient information to proceed with further inquiry; (c) the complaint has already been reviewed or adjudicated by OPA and/or OIG; or (d) the complaint presents fact patterns that are clearly implausible or incredible, and there are no indicia of other potential misconduct.

<sup>2</sup> The current process has varying requirements for *prompt* or *immediate* notification, depending on the type of notification.

<sup>3</sup> The current process requires intakes and investigations to be timely, thorough, and *neutral*.

## 2. CAPITAL IMPROVEMENT PROGRAM

Does this legislation create, fund, or amend a CIP Project?  Yes  No

## 3. SUMMARY OF FINANCIAL IMPLICATIONS

Does this legislation have financial impacts to the City?  Yes  No

### 3.d. Other Impacts

Does the legislation have other financial impacts to The City of Seattle, including direct or indirect, one-time or ongoing costs, that are not reflected above? If so, please describe these financial impacts. N/A

If the legislation has costs, but they can be absorbed within existing operations, please describe how those costs can be absorbed. The description should clearly describe if the absorbed costs are achievable because the department had excess resources within their existing budget or if by absorbing these costs the department is deprioritizing other work that would have used these resources. N/A

Please describe any financial costs or other impacts of *not* implementing the legislation. This legislation is intended to improve the City's process of investigating complaints naming the Chief of Police. Not implementing this legislation could limit the City's ability to efficiently conduct investigations and result in inconsistent reporting practices, potentially undermining the public trust in the City's police accountability system.

## 4. OTHER IMPLICATIONS

- a. Please describe how this legislation may affect any departments besides the originating department. This legislation proposes changes to policies and procedures that would impact OPA and OIG. These impacts are intended to improve operations and accountability; and are not forecasted to result in incremental changes to department budgets or FTE counts.
- b. Does this legislation affect a piece of property? If yes, please attach a map and explain any impacts on the property. Please attach any Environmental Impact Statements, Determinations of Non-Significance, or other reports generated for this property. N/A



- c. **Please describe any perceived implication for the principles of the Race and Social Justice Initiative.<sup>4</sup>**
- i. **How does this legislation impact vulnerable or historically disadvantaged communities? How did you arrive at this conclusion? In your response, please consider impacts within City government (employees, internal programs) as well as in the broader community.** This legislation is intended to strengthen the City's civilian oversight of misconduct complaints naming the Chief of Police by instituting a more efficient and transparent process for intakes and investigations. An ongoing practice of re-examining and revising the City's internal processes, including the handling of misconduct complaints naming the Chief of Police, is critical for building a lasting police accountability system that is responsive and accountable to vulnerable or historically disadvantaged communities.
  - ii. **Please attach any Racial Equity Toolkits or other racial equity analyses in the development and/or assessment of the legislation.** N/A
  - iii. **What is the Language Access Plan for any communications to the public?** N/A
- d. **Climate Change Implications**
- i. **Emissions: How is this legislation likely to increase or decrease carbon emissions in a material way? Please attach any studies or other materials that were used to inform this response.** N/A
  - ii. **Resiliency: Will the action(s) proposed by this legislation increase or decrease Seattle's resiliency (or ability to adapt) to climate change in a material way? If so, explain. If it is likely to decrease resiliency in a material way, describe what will or could be done to mitigate the effects.** N/A
- e. **If this legislation includes a new initiative or a major programmatic expansion: What are the specific long-term and measurable goal(s) of the program? How will this legislation help achieve the program's desired goal(s)? What mechanisms will be used to measure progress towards meeting those goals?** N/A

## 5. CHECKLIST

Please click the appropriate box if any of these questions apply to this legislation.

- Is a public hearing required?**
- Is publication of notice with *The Daily Journal of Commerce* and/or *The Seattle Times* required?**
- If this legislation changes spending and/or revenues for a fund, have you reviewed the relevant fund policies and determined that this legislation complies?**

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<sup>4</sup> Principles: The City of Seattle Race and Social Justice Initiative.  
<https://www.seattle.gov/rsji/about/principles#:~:text=Our%20commitment%20to%20ending%20racial,those%20who%20need%20it%20most>. Accessed online April 21, 2025

- Does this legislation create a non-utility CIP project that involves a shared financial commitment with a non-City partner agency or organization?**

## **6. ATTACHMENTS**

**List Summary Attachments (if any):**



SEATTLE CITY COUNCIL  
**CENTRAL STAFF**

# **Council Bill 120977: Amendments to Chief of Police Investigations Process**

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KARINA BULL, LEGISLATIVE ANALYST

PUBLIC SAFETY COMMITTEE

MAY 13, 2025

# Outline

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- Background – Accountability Ordinance and Chief of Police Investigations
- Policy Goals
- Summary of [Council Bill \(CB\) 120977](#)
- Next Steps

# Background – Accountability Ordinance (1/2)

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- In 2017, [Ordinance 125315](#) (Accountability Ordinance) established the City’s three-pronged police oversight system:
  1. **Office of Police Accountability** – independent, civilian-led office within SPD that investigates misconduct complaints involving SPD employees
  2. **Office of Inspector General for Public Safety** – independent office separate from the Executive that reviews and audits SPD and OPA
  3. **Community Police Commission** – community-based oversight commission that reviews closed OPA investigations
- This system did not include a process for investigating misconduct complaints naming the Chief of Police and ensuring that such complaints would be handled in a fair and transparent manner, free of potential conflicts of interest

# Background – Chief of Police Investigations (2/2)

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- In 2022, [Ordinance 126628](#) established a specific process for OPA's handling of complaints naming the Chief of Police that included an oversight role for OIG
- Since July 2022, OPA has received over 70 complaints
- Issues with the current investigation process that limit OPA and OIG's ability to address these complaints in a timely, efficient, and accountable manner:
  - Comprehensive intakes for all complaints
  - Staffing restrictions for conducting intakes
  - Inconsistent technical requirements
  - New complaints during an OIG-managed investigation
  - Limited reporting requirements

# Policy Goals

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- Streamline and clarify the intake/investigation process for complaints naming the Chief of Police
- Provide staffing flexibility
- Support procedural efficiency
- Increase transparency

# Summary of CB 120977

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Amendments to Chief of Police investigation process:

- Allow OPA, with OIG's agreement, to close qualifying complaints as a *contact log* after an initial screening
- Allow OPA to assign *non-supervisory, civilian staff* to intakes
- Clarify that investigations must be timely, thorough, and *objective*
- Establish a consistent requirement for OIG to *promptly* notify City entities and the complainant
- Allow OIG to initiate and manage the investigation of a new complaint that arises during an ongoing investigation managed by OIG
- Require OIG to include information on complaints in *quarterly reports* for the Mayor, the President of the Council, and the Chair of the Council's public safety committee, and in its *annual report* for the public



# Next Steps

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- May 27 – Committee discussion and possible vote
- June 3 – Earliest possible date for Council action

# Questions?

May 9, 2025

## MEMORANDUM

**To:** Public Safety Committee  
**From:** Karina Bull, Analyst  
**Subject:** Chief of Police Investigation Process

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On May 13, 2025, the Public Safety Committee (Committee) will discuss [Council Bill \(CB\) 120977](#), that would amend the City's process for investigating complaints naming the Chief of Police. This memo provides background on Chief of Police investigations, summarizes the legislation, and identifies next steps.

### Background on Chief of Police investigations

In 2017, [Ordinance 125315](#) (Accountability Ordinance) established the City's three-pronged police oversight system to (1) ensure that police services are delivered to the people of Seattle in a manner that fully complies with the Constitution and laws of the United States and the State of Washington; (2) ensure public and officer safety; and (3) promote public confidence in the Seattle Police Department (SPD).

In this system, the roles of the three accountability agencies, the Office of Police Accountability (OPA), the Office of Inspector General for Public Safety (OIG), and the Community Police Commission (CPC), are as follows:

- The OPA is an independent, civilian-led office within SPD that investigates misconduct complaints involving SPD employees to ensure that the actions of SPD employees are lawful and in compliance with SPD policies;
- The OIG is an independent office separate from the Executive that reviews and audits the management, practices, and policies of SPD and OPA, including OPA's handling of misconduct complaints; and
- The CPC is a community-based oversight commission that reviews closed OPA investigations and engages the community to develop recommendations on the police accountability system and identify opportunities for systemic improvements.

Although the Accountability Ordinance established standards and procedures for investigating misconduct complaints involving SPD employees, the ordinance did not include a process for ensuring that misconduct complaints naming the Chief of Police would be handled in a fair and transparent manner, free of potential conflicts of interest.

In 2022, [Ordinance 126628](#) created a specific process for OPA’s handling of complaints naming the Chief of Police, including but not limited to: (1) conducting a comprehensive intake investigation (intake) for every complaint; (2) requiring civilian supervisors to conduct intakes; (3) recommending classification determinations on whether and how to proceed with investigations; (4) determining whether a City entity (i.e., OPA or the Seattle Department of Human Resources) or non-City entity would perform the investigation depending on the presence of real or potential conflicts of interest and type of allegation(s); and (5) assigning civilian staff to perform investigations.

This process also created an oversight role for OIG including but not limited to: (1) receiving notice of complaints; (2) reviewing and auditing intake and investigations, (3) finalizing classification determinations; (4) providing notifications to City entities and the complainant.

Since Ordinance 126628 went into effect in July 2022, OPA has received over 70 complaints naming the Chief of Police. After several years of implementation, OPA and OIG have signaled that certain aspects of the investigation process limit their ability to efficiently address these complaints. For example:

- **Comprehensive intakes for all complaints** – OPA must conduct a full examination of every complaint regardless of the content or allegations, including complaints that do not allege a plausible violation or present issues that have already been reviewed or adjudicated;
- **Staffing restrictions for conducting intakes** – Only two civilian supervisors are allowed to conduct intakes although there are potentially up to four civilian investigators who could also perform this work;
- **Inconsistent technical requirements** – The investigation standard (i.e., timely, thorough, and *neutral*) is different than the standard established by the Accountability Ordinance (i.e., timely, thorough, and *objective*), and there are varying timeline requirements (i.e., promptly or immediately) for OIG’s notifications to City entities and the complainant; and
- **New complaints during an OIG-managed investigation** – There is not an established procedure for handling new complaints that arise during an ongoing investigation managed by OIG.

In addition, there are **limited reporting requirements**. While OIG must provide several notifications (e.g., notice of an open investigation) to City entities and the complainant, the only public reporting requirement is to include the number of complaints closed as a *contact log*<sup>1</sup> in OIG’s annual report.<sup>2</sup>

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<sup>1</sup> Under Ordinance 126628, a contact log is a type of classification that resolves a complaint without an investigation. This classification includes circumstances when: (a) the complaint does not involve a potential policy violation by an SPD employee; (b) there is insufficient information to proceed with further inquiry; (c) the complaint has already been reviewed or adjudicated by OPA and/or OIG; or (d) the complaint presents fact patterns that are clearly implausible or incredible, and there are no indicia of other potential misconduct.

<sup>2</sup> OPA included limited information on complaints naming the Chief of Police in its [2022 Annual Report](#) and [2023 Annual Report](#).

## Summary of CB 120977

CB 120977 would amend Ordinance 126628 with the intention of streamlining and clarifying the intake and investigation process to provide staffing flexibility, support procedural efficiency, and increase transparency. The bill would:

- Allow OPA, with OIG's agreement, to close qualifying complaints as a contact log after an initial screening;
- Allow OPA to assign non-supervisory, civilian staff to intakes;
- Allow OIG to initiate and manage the investigation of a new complaint that arises during an ongoing investigation managed by OIG;
- Clarify that all investigations must be timely, thorough and *objective*;
- Establish a consistent requirement for OIG to *promptly* notify City entities and the complainant; and
- Require OIG to include information on complaints, intakes, and investigations naming the Chief of Police in *quarterly reports* for the Mayor, the President of the City Council, and the Chair of the Council's public safety committee, and in its *annual report* for the public.

## Next Steps

The Committee will continue discussing and may vote on CB 120977 at the next Committee meeting on May 27, 2025. If the Committee votes to make a recommendation on CB 120977 on that date, the City Council could vote on the legislation as early as June 3, 2025.

cc: Ben Noble, Director  
Lish Whitson, Supervising Analyst



Legislation Text

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**File #:** Inf 2678, **Version:** 1

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StarChase Technology Briefing

# Surveillance Impact Report (SIR) Material Update

*Seattle Police Department (SPD) Tracking Devices SIR*

*May 13, 2025*

SEATTLE  
CITY HALL

# Purpose of Proposed Legislation

- Original Surveillance Impact Report (SIR) for Tracking Devices technology was passed by the City Council on **2/28/23** (Ordinance 126776).
- SPD has received a **\$250,000 grant** from the WA State Dept. of Commerce for Law Enforcement Pursuit Technology, which will help local law enforcement mitigate vehicle pursuits.
- SPD acquiring pursuit mitigation GPS tracker launchers qualifies as a material update, therefore requiring this proposed legislation.
- Section 14.18.020.F of the Seattle Municipal Code (SMC) states that "*[a]ny material update to an SIR, such as to change the purpose or manner in which a surveillance technology may be used, shall be by ordinance.*" SMC 14.18 does not require material updates to go through the same process as the original SIR.





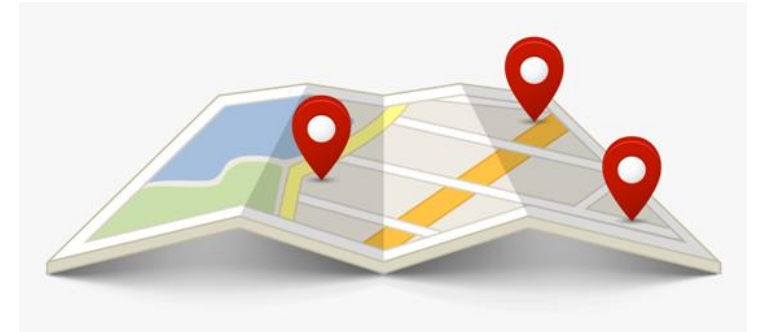
# Tracking Devices (Original SIR)

## What is the technology?

- Geolocation trackers are cellular devices that SPD utilizes as a tool to locate and track the movements and locations of vehicles.
- These trackers are location tracking devices that report latitude and longitude as well as other device information such as high temperature alerts, device removal, power/shut down alerts, and battery level.

## Why do we use the technology?

- The primary benefit of these tracking systems is in the gathering of evidence used in the resolution of criminal investigations. Proper gathering of location evidence of criminal activity by the police supports SPD's mission to prevent crime, enforce the law, and support quality public safety.
- Trackers allow SPD to remotely track vehicles electronically. They also allow SPD to locate vehicles and individuals that are sought in connection with an active investigation. They are only utilized with consent of a witness, a confidential informant, or within the scope of a judicially issued search warrant.



# Tracking Devices (Original SIR)

## Data Collection

- Tracking devices are only utilized with express consent or search warrant authority. These devices report latitude and longitude coordinates on a pre-determined schedule that can be adjusted by users remotely.
- Data collected from the tracking devices is provided to the requesting Officer/Detective for inclusion in the investigation file and is stored following evidence guidelines.

## Protections

- All deployments of these devices are documented by TESU and subject to audit by the Office of Inspector General and the federal monitor at any time.
- All information must be gathered and recorded in a manner that is consistent with SPD Policy 6.060, such that it does not reasonably infringe upon “individual rights, liberties, and freedoms secured by the Constitution of the United States and of the State of Washington, including, among others, the freedom of speech, press, association and assembly; liberty of conscience; the exercise of religion; and the right to petition government for redress of grievances; or violate an individual’s right to privacy.”

# What is the Material Update?

- SPD is seeking this tool in accordance with RCW 10.116.060.2.d, which requires agencies to “develop a plan to end the pursuit through the use of available pursuit intervention options,” ensuring compliance with recent state law updates regarding pursuit mitigation.
- This specialized GPS tracker allows SPD to track the precise location of a vehicle for which probable cause or reasonable suspicion of involvement in a crime has been established and accomplish the task of recovery or arrest without the need for initiating or continuing a vehicle pursuit.
- 25 SPD patrol vehicles will be equipped with GPS tracker launchers.
- All sworn SPD officers will be trained in the use of pursuit mitigation GPS trackers.
- Pursuit mitigation GPS trackers will be monitored primarily by the Real Time Crime Center and information will be relayed to patrol units in the field. Patrol units can also monitor the trackers' location directly if RTCC is unavailable.

## SENATE BILL REPORT SI 2113

As Passed Senate, March 4, 2024

**Title:**

**Brief Description:** Concerning vehicular pursuits by peace officers.

**Sponsors:** People of the State of Washington.

**Brief History:**

**Committee Activity:** Law & Justice: 2/28/24, 3/01/24 [DP, DNP, w/oRec].

**Floor Activity:** Passed Senate: 3/4/24, 36-13.

### Brief Summary of Initiative

- Expands authorization for vehicular pursuits by allowing an officer to conduct a vehicular pursuit where there is reasonable suspicion a person has violated the law.
- Modifies the risk assessment for engaging in vehicular pursuits by providing that an officer may not engage in a vehicular pursuit unless the person poses a threat to the safety of others and the safety risks of failing to apprehend or identify the person are considered to be greater than the safety risks of the vehicular pursuit under the circumstances.

# What will not change?

- No changes will be made to the previously approved requirements related to covert tracking systems.

# Fiscal Impact

- SPD has received a \$250,000 Washington State Department of Commerce Law Enforcement Pursuit Technology grant.
- If the GPS pursuit mitigation trackers are determined to be a worthwhile program, the ongoing cost to maintain the 25 launchers' subscriptions is \$37,500.
- Cost savings may be seen in reduced liability from decreased number of vehicle pursuits, which often result in litigation. Additionally, pursuits often result in damage to city owned equipment, specifically police cars. This technology can reduce those costs as well by negating the need for pursuits.
- Additional grants may be available in the future to provide ongoing funding, should the department decide to increase or continue the deployment.



# References

- **Departments in Washington State already using StarChase:**
  - King County Sheriff's Office
  - Lynnwood Police Department
  - Tacoma Police Department
  - Redmond Police Department
  - Everett Police Department
  - Thurston County Sheriff's Office



# Questions