



**REGULAR MEETING NOTICE/AGENDA
THE CIVIL SERVICE COMMISSION
9:30 a.m. – JULY 20, 2021**

Notice is hereby given that, pursuant to Governor Jay Inslee's Fifteenth Updated Proclamation 20-28.15, dated January 19, 2021, all public meetings subject to the Open Public Meetings Act, Chapter 42.30 RCW, are to be held remotely and that the in-person attendance requirement in RCW 42.30.030 has been suspended until termination of the state of emergency pursuant to RCW 43.06.210 or until rescinded, whichever occurs first. Proclamations 20-28, et seq, were amended by the Washington State Legislature to recognize the extension of statutory waivers and suspensions therein until termination of the state of emergency pursuant to RCW 43.06.210 or until rescinded.

While all public meetings must continue to be held remotely, an option for an additional in-person meeting component is permitted consistent with the public meetings requirements contained in the Miscellaneous Venues guidance incorporated into Proclamation 20-25, et seq. At this time, the Civil Service Commission has decided to continue its meetings with remote access only and to not include an in-person attendance component.

The regularly scheduled Civil Service Commission Meeting, July 20, 2021 at 9:30 a.m. will be held virtually, some members of the Civil Service Commission staff will be attending virtually.

Temporarily and until further notice, the public's ability to attend Civil Service Commission meetings is by remote access only. In-person attendance is not permitted at this time. **The public is encouraged to tune in to the meeting by calling 1-408-418-9388 and entering the access code 1467 41 3178 when prompted.**



AGENDA

REGULAR MEETING OF THE CIVIL SERVICE COMMISSION

9:30 A.M. July 20, 2021

CITY HALL – CITY COUNCIL BRIEFING CENTER

808 W. SPOKANE FALLS BLVD., SPOKANE, WA 99201

1. CALL TO ORDER/ROLL CALL

2. APPROVAL OF MINUTES

- a. June 15, 2021 Minutes
(p. 3)

3. CHIEF EXAMINER UPDATE

4. NEW BUSINESS

- a. Resolution 2021-03: Classification Actions
(Pearson, p. 4)
- b. Conrath Appeal Hearing
(Pearson, p. 9)

5. EXECUTIVE SESSION

6. ADJOURN

Note: The meeting is open to the public, with the possibility of the Commission adjourning into executive session.



**REGULAR MEETING OF THE CIVIL SERVICE COMMISSION
MINUTES - JUNE 15, 2021**

1. CALL TO ORDER/ROLL CALL

Meeting called to order at 9:32 a.m.

Commissioners Gilmore, Palmerton, and Stephens were present via Webex.

Commissioners Hult and Lindsey were absent (excused).

2. APPROVAL OF MINUTES

- a. May 18, 2021 Minutes

MOTION: Move to approve May 18, 2021 Minutes.

Stephens/Palmerton: Motion passed unanimously.

3. CHIEF EXAMINER UPDATE

Chief Examiner Pearson provided updates regarding Civil Service department operations.

- i. TEST FEST recruitment opening on Friday, June 18, 2021

1. We will be testing for Custodian I, Laborer I, Meter Reader, Park Caretaker, Radio Operator I, and Refuse Collector I.

2. Testing will occur during the 3rd week of July at North Central High School.

- ii. Career Open House at Martin Luther King, Jr. Community Center's Juneteenth Celebration on Saturday, June 19th, 2021.

1. Civil Service will be available from 11:00 a.m. – 3:00 p.m. to assist candidates in creating accounts for testing.

- iii. Reminder that next month's appeal on June 20th may go all day and that we will more than likely be remote still.

- iv. Commissioner Gilmore asked how the May 19, 2021 "Lunch & Learn" went.

1. Chief Examiner responded that it was very well attended and we will always be doing a virtual/ hybrid as more employees are able to attend this way at worksites away from City Hall.

4. NEW BUSINESS

- a. Findings of Fact, Conclusions of Law and Decision in the V. Nicholas Appeal

MOTION: Approve the Findings of Fact, Conclusions of Law as presented.

Stephens/Palmerton: Motion passed unanimously.

5. OTHER BUSINESS

- a. Chief Examiner Offer Letter

MOTION: Accept the Offer Letter as presented, signed, and delivered.

Stephens/Palmerton: Motion passed unanimously.

6. ADJOURN

The Commission adjourned at 9:46 a.m.



Civil Service Commission



ITEM 4A – RESOLUTION 2021-01: CLASSIFICATION ACTIONS

BACKGROUND

Staff are bringing forward one classification for adoption.

SPN 416 - Custodial Foreperson was deleted from active use in December 2016. The new Facilities Director, Jeff Teal, has requested re-activation of this job classification to meet current needs of the City. Staff worked with Jeff as subject matter expert to update this job classification as appropriate for current use.

Local 270 was consulted for feedback, and they support the reactivation and revision as well.

RECOMMENDATION

Staff recommends adoption of classification Resolution 2021-03.

Attachments:

- 1) Job Classification - Final: Custodial Foreperson, SPN 416
- 2) Job Classification - Markup: Custodial Foreperson, SPN 416



Job Classification Specification

CITY OF SPOKANE CIVIL SERVICE COMMISSION

• ESTABLISHED 1910

CUSTODIAL FOREPERSON

SPN: 416

Bargaining Unit: Local 270

Pay Range: 34

Effective Date: 7/2021

CLASS SUMMARY

Performs supervisory work in the cleaning, disinfecting, and custodial care of City-owned facilities. Duties are performed within various City-owned buildings in full operation, and employee must coordinate with other staff to minimize inconvenience. Employee may be required to work unusual hours or split shifts.

CLASS CHARACTERISTICS

Duties require independent judgment as to the methods and equipment to be used. Most work is not subject to checks and controls or verified by others.

SUPERVISION RECEIVED AND EXERCISED

Employee plans and arranges their own work under general supervision, referring only unusual cases to the supervisor. Directly supervises custodial workers, assigning the work to be completed.

EXAMPLES OF JOB FUNCTIONS

This description was prepared to indicate the kinds of activities and levels of work difficulty required of positions in this class. It is not intended as a complete list of specific duties and responsibilities.

- Reviews the custodial schedule tasking daily. Plans, assigns, and supervises semi-skilled employees engaged in the cleaning and custodial care of City-owned facilities.
- Schedules and adjusts as needed, the number of employees required to perform custodial work based upon the number, type, and size of scheduled activities.
- Schedules work and provides training to permanent and temporary/seasonal employees in the proper use of equipment and supplies, the occupational hazards of the work, and the necessary safety precautions.
- Coordinates cleaning and tasking in cooperation with other staff involved in setup/changeover activities. Supplements setup/changeover staff and supervises as necessary to ensure work is accomplished on schedule and according to plans.
- Obtains bids from contractors on large custodial contracts. Checks the work being performed for quality and to ensure timeliness.
- Responds to custodial requests and concerns from all other City departments.
- Determines the best equipment and supplies available for the tasks within the different facilities such as the fabrics and materials used in these facilities; orders and maintains an inventory of such equipment and supplies.
- Plans annual, semi-annual, and seasonal custodial projects
- Participates in the hiring process for permanent custodial employees. Hires and terminates temporary/seasonal employees as needed.
- Assists in the preparation of the budget as to equipment, supplies, and the need for part-time/seasonal custodial help.
- Performs related work as required.

COMPETENCIESKnowledge of:

- The equipment, cleaning supplies, and methods to be used on various surfaces.
- The physical facilities required to be cleaned and the various physical dimensions within those facilities.
- The occupational hazards of the work and the necessary safety precautions.
- Measures for cost saving efficiencies and LEAN processes.
- Custodial contracts.
- Record keeping and correspondence, including computer software such as spreadsheet, word processing, email, etc.

Skill in:

- Oral and written communication.
- Organizing work and setting priorities.

Ability to:

- Plan and coordinate work on varying shift schedules subject to frequent revision.
- Estimate and plan for needed custodial work, including time and costs.
- Supervise and train full-time, part-time, and semi-skilled custodial workers.
- Maintain effective public and working relations.

PHYSICAL DEMANDS

The typical demands of the work require the ability to:

- Read standard text.
- Converse in person and on the telephone.
- Climb ladders and stairs.
- Move about facilities.
- Write and to use a keyboard.
- Lift, drag, and carry items weighing up to 50 lbs.

WORK ENVIRONMENT

Some work is performed under adverse conditions, such as exposure to dust, dirt, and cleaning agent odors, and outdoors in heat and cold.

MINIMUM QUALIFICATIONS

Combinations of education and experience that are equivalent to the following minimum qualifications are acceptable.

Open-Entry Requirements:

- Experience: Four years of work supervising custodial crews involved in the cleaning and comprehensive custodial care of large buildings or complexes.

Licenses and Certifications:

- A valid driver's license is required, to be maintained throughout employment.

CUSTODIAL FOREPERSON

SPN: 416

NATURE OF WORK:

Performs ~~responsible~~ supervisory work in the cleaning, disinfecting, and custodial care, ~~and maintenance~~ of ~~entertainment, sports, and convention type City-owned~~ facilities. Duties require, ~~including surrounding grounds, where routine cleaning and planned maintenance must be coordinated with changeover activities~~ independent judgment as to the methods and equipment to be used. Most work is not subject to checks and controls or verified by others. Duties are performed within ~~a civic center various City-owned buildings~~ in full operation, and employee must coordinate with other staff ~~so as~~ to minimize inconvenience. Employee may be required to work unusual hours or split shifts.

SUPERVISION:

Employee plans and arranges their own work under general supervision, referring only unusual cases to the supervisor. Directly supervises ~~the~~ custodial workers, assigning the work to be ~~done~~completed.

ESSENTIAL JOB FUNCTIONS:

Reviews the ~~event custodial~~ schedule tasking daily. Plans, assigns, and supervises semi-skilled employees engaged in the cleaning, ~~maintenance,~~ and custodial care of City-owned auditorium and convention type facilities.

Schedules and adjusts as needed, the number of employees required to perform custodial ~~and maintenance~~ work based upon the number, type, and size of scheduled ~~events~~activities.

Schedules work and provides training to permanent and temporary/seasonal employees in the proper use of equipment and supplies, the occupational hazards of the work, and the necessary safety precautions.

Coordinates cleaning and ~~tasking maintenance activities~~ in cooperation with other staff involved in setup/changeover activities. Supplements setup/changeover staff and supervises as necessary to ensure work is accomplished on schedule and according to plans.

Obtains bids from contractors on large ~~maintenance custodial~~ contracts. Checks the work being performed for quality and to ensure ~~timeliness it is done in a timely manner~~.

Responds to custodial requests and concerns from all other City departments.

Determines the best equipment and supplies available ~~to do for~~ the job tasks within the different facilities ~~in relation to such as~~ the fabrics and materials ~~involved used~~ in these facilities; orders and maintains an inventory of such equipment and supplies.

Plans annual, semi-annual, and seasonal ~~maintenance custodial~~ projects ~~including outdoor plantings and grounds maintenance~~.

Participates in the hiring process for permanent custodial employees. Hires and terminates temporary/seasonal employees as needed.

Assists in the preparation of the budget as to equipment, supplies, and the need for part-time/seasonal custodial help.

Performs related work as required.

Custodial Foreperson

Page two

REQUIREMENTS OF WORK:

- Considerable knowledge of the equipment, cleaning supplies, and methods to be used on various ~~synthetic~~ surfaces.
- Considerable knowledge of the physical facilities required to be cleaned and the various physical dimensions within those facilities.
- Considerable knowledge of the occupational hazards of the work and the necessary safety precautions.
- Knowledge of measures for cost saving efficiencies and LEAN processes.
- Knowledge of custodial contracts.
- Knowledge of record keeping and correspondence, including computer software such as spreadsheet, word processing, email, etc.
- Skill in oral and written communication.
- Skill in organizing work and setting priorities.
- Ability to plan and coordinate work on varying shift-a special 24-hour schedules ~~which is~~ subject to frequent revision.
- Ability to estimate and plan for needed custodial ~~and maintenance~~ work, ~~both as to the~~ including tasks-time and costs-the costs of performance.
- Ability to supervise and train full-time, part-time, and semi-skilled custodial workers ~~,-~~
- Ability to and maintain effective public and working relations.

PHYSICAL REQUIREMENTS:

- Ability to ~~see, with or without corrective lenses, well enough to~~ read standard text.
- Ability to converse ~~hear, with or without a hearing aid, and speak well enough to~~ in person and on the telephone.
- Ability to climb ladders and stairs.
- Ability to move about facilities. Enough body mobility to walk and stoop.
- Ability Enough manual dexterity to write and to use a keyboard.
- Ability Enough strength to lift, and drag, and carry items material weighing up to 50 lbs.
- ~~Enough stamina to stand for up to four hours at a time with only one 15-minute break.~~
- Ability Tolerance to work under adverse conditions, such as exposure to dust, dirt, and cleaning agent odors, and outdoors in heat and cold.

MINIMUM EDUCATION AND EXPERIENCE:

Open Entry Requirements: ~~Three-Four~~ years of experience supervising custodial crews involved in the cleaning and comprehensive custodial care of large buildings, ~~one year of which must have involved supervision of such crews in a large or complexes, such as a hotel, or other facility with sizeable convention -- meeting -- show type activities, where changeover operations were quite common.~~

License: A valid driver's license is required, to be maintained throughout employment.

Reactivated: 7/21

Deleted: 12/16

New: 11/78

Title Change: 8/93

Revised: 9/80, 9/84, 3/92, 4/96, 7/00, 7/21

Reviewed: 9/82, 9/86, 9/88, 4/94, 3/98, 3/20, 6/02, 9/04, 9/06, 12/09, 3/12

Union: 270

Range: 34

EEO code: 8



Civil Service Commission

ITEM 4B – CONRATH APPEAL HEARING

BACKGROUND

Mr. Conrath a Police Corporal for the City of Spokane Police Department was passed over for the position of Police Sergeant under Civil Service Rule V, Section 4(a).

Under Civil Service Rule V, Section 4(a):

.....No promotion certification shall be rejected except for reasonable cause and no promotional eligible shall be passed over except for reasonable cause. Reasonable cause for passing over a promotional eligible may include the following:

- 1) An eligible's documented substandard work performance, or
- 2) An eligible's documented prior disciplinary problems, or
- 3) Documented errors in an eligible's judgment, or
- 4) Any other documented performance-related reasons, or
- 5) Mutual Passover

Mr. Conrath was notified by the Chief Examiner according to Civil Service Rule V, Section 4(c). In return, Mr. Conrath petitioned according to Civil Service Rule V, Section 4(c).

Under Civil Service Rule V, Section 4(c):

Upon receipt of a rejected promotional certification, or a certification which passed over a promotional eligible, the Chief Examiner shall without delay notify the eligible/s in writing. A rejected uniformed promotion eligible or a passed over non-uniformed promotion eligible shall have the right to petition the Commission within five working days from the date of said notification. The petition must be in writing and filed with the Chief Examiner who shall then notify the Human Resources Director. The Commission shall thereupon set a date of hearing in the same manner as provided by the Charter and Rule XI for appeals.

Mr. Conrath is being represented by Mr. Joe Kuhlman, the City of Spokane is being represented by Mr. Mike Bolasina.

Attachments:

- Conrath v. City of Spokane #C20-074 Attachments
- City of Spokane's Prehearing Brief, Witness List, and Exhibits

Conrath v. City of Spokane #C20-074



Attachment(s)

Notes:



SPOKANE POLICE DIVISION
CHIEF OF POLICE
CRAIG N. MEIDL

***Internal Affairs Investigation
Case Finding Notice***

To: Corporal Christopher Conrath #1106

Date: 1/23/2021

From: Chief Craig Meidl #388

IA Number: C20-074

An internal review has been concluded concerning certain allegations of misconduct. These allegations stem from an incident that occurred on:

Complainant: William Essary

Investigator: Sergeant A. Dollard

Incident Number: 2020-20108102

Received Date: 6/29/2020

Allegation: Conduct Unbecoming

Finding: Sustained

Allegation: Nepotism and Conflicting Relationships

Finding: Sustained

Allegation: Making a False or Misleading Statement

Finding: Not Sustained

Allegation: Policy Violation

Finding: Not Sustained

Policy 340.3.2 (m) – Engaging in on-duty sexual relations

Sanction: None.



Chief Craig Meidl #388

This case file will be maintained in the Internal Affairs files and available for your review. In the event of an "Improper Conduct" finding, a copy of any disciplinary report will become a part of your personnel file.

Public Safety Building • 1100 W. Mallon Avenue • Spokane, Washington 99260-0001





CITY OF SPOKANE
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201-3327
509.625.6250

DATE: 01/25/2021

TO: Christopher Conrath, Police Officer

FROM: Scott Simmons, Interim City Administrator; Craig N. Meidl, Police Chief

SUBJECT: Findings of Internal Affairs investigation #C20-074

Reference: Merit System Rules of the Civil Service Commission; SPD Policies 1050.2D; 340.3.2M; 340.3.5P; and SPD Ethical Standard 4.9

This memorandum sets forth the findings of the Internal Affairs investigation #C20-074 based upon your violation of Civil Service Rules governing compliance with written department rules and procedures and Spokane Police Department (SPD) Policy 1050.2D and Ethical Standard 4.9.

The internal investigation was conducted as a result of a complaint of an inappropriate sexual relationship between you and a member of the public. The complaint alleged your contact with the other individual occurred when you responded to a call for service to a domestic situation. The allegations occurred during the years 2015 and 2016, and the SPD Policy manual in effect during that period was reviewed. The 2015/2016 SPD Policies reviewed in this investigation were:

1. SPD Policy 1050.2D: Developing and maintaining a personal relationship with an individual as a direct result of any official contact.
2. SPD Ethical Standard 4.9: Members of the Spokane Police Department shall at all times conduct themselves in a manner which does not discredit the law enforcement profession or the Spokane Police Department.
3. SPD Policy 340.3.2M: Engaging in on-duty sexual relations.
4. SPD Policy 340.3.5P: Failure to disclose material facts or the making of any false or misleading statement on any application, examination form or other official document, report, form, or during the course of any work-related investigation.

On 9/11/2020, SPD was contacted by a citizen, alleging that you had an inappropriate sexual relationship with his former wife following a domestic violence call for service on 5/27/2015. The citizen alleged his estranged wife chronicled that relationship from June 2015 to January 2016, which comprised of a ride-a-long with you, shooting at the Department's Academy range, visits from you while you were on-duty as well as off-duty and staying the night at her residence.

Due to the seriousness of the allegations, as well as prior history of similar behavior, Internal Affairs conducted an investigation into the allegations.

Administrative Review Panel (ARP) findings were submitted on 12/9/2020. The ARP recommended *Sustained* findings regarding the above-listed allegations 1 and 2 and *Not Sustained* findings on above-listed allegations 3 and 4.

Page 1 of 3

On 1/21/2021, a *Loudermill* hearing was convened to provide you an opportunity to respond to the allegations of the complaint. Present at the hearing with you were: Craig Meidl, Police Chief; Justin Lundgren, Assistant Police Chief; Eric Olsen, Major; Mike McNab, Major; Jacqui MacConnell, Director of Strategic Initiatives; Jennifer Hammond, Director of Police Business Services; Meghann Steinolfson, Labor Relations Manager; Sgt. Arthur Dollard, Internal Affairs; Lt. Matt Cowles, Internal Affairs; Police Guild representatives Kris Honaker, David Dunkin and Ty Snider; and your attorney Joseph Kuhlman.

During the *Loudermill* hearing, your attorney indicated you were not prepared to make any further comments and that you believed that because the allegations occurred more than a year prior that they should not have been investigated. You acknowledged you had an extra-marital affair five years ago, you were harshly disciplined for a separate incident and that your work since then has been exemplary.

Based on the evidence, I am in agreement with the Administrative Review Panel that you violated SPD Policy 1050.2D and SPD Ethical Standard 4.9. I am also in agreement with the Administrative Review Panel that violation of SPD Policy 340.3.2M and SPD Policy 340.3.5P was not proven by clear and convincing evidence.

SPD Policy 1020.2.3D, which outlines the timeline to investigate non-criminal complaints, necessitates that no Department sanctions may be imposed.

Going forward, expected performance standards are as follows:

1. You will conduct yourself in a professional manner in your public and private affairs, exemplifying the high standards of integrity, trust, and morality demanded of a member of the Spokane Police Department.
2. You will be courteous and respectful in your official dealings with the public, fellow members, supervisors, and subordinates.
3. You are prohibited from having ride-a-longs for three years.
4. You are prohibited from taking non-family members to the shooting range for three years.

If you continue to violate SPD Policies or Civil Service rules as discussed in this letter, you will be subject to discipline up to and including termination.

Scott Simmons
Scott Simmons
Interim City Administrator, City of Spokane

1/25/21
Date

C. N. Meidl
Craig N. Meidl
Police Chief, City of Spokane

2/1/2021
Date

You are requested to provide your signature and to fill in the date line below acknowledging receipt of this correspondence. Any refusal to sign will be noted by your supervisor but will not result in any change in the processing of this document and its inclusion in your official personnel file.

C. Conrath 1106
Receipt Acknowledged – Officer Chris Conrath

020321 1630
Date Time

cc: Kelsey Pearson, Interim Chief Examiner, Civil Service
Craig Meidl, Police Chief
Justin Lundgren, Assistant Police Chief
Amber Richards, Human Resources Director
Meghann Steinolfson, Labor Relations Manager
Jennifer Hammond, Director, Police Business Services
Nate Odle, Legal
Kris Honaker, Guild President
Tim Schwering, Guild Vice President
David Dunkin, Guild Vice President



CITY OF SPOKANE
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201-3327
509.625.6250

December 7, 2020

Kris Honaker, President
Spokane Police Guild
krhonaker@spokanepolice.org

Re: Step 4 Grievance Response – I.A. #C20-074, Conrath

Dear Mr. Honaker,

I am in receipt of your Step 3 Grievance filed on November 18, 2020. The Police Guild alleges the City committed both an Unfair Labor Practice and a violation of Article 24 – Discipline of the parties Collective Bargaining Agreement when Internal Affairs (I.A.) opened investigation #C20-074. I.A. Investigation #C20-074 involves allegations of misconduct involving Cpl. Conrath that allegedly took place approximately five years ago, but which the City only became aware of on September 11, 2020.

The Grievance fails to allege any violation of Article 24. Rather, the Guild relies upon Spokane Police Department (SPD) Policy 1020.2.3.D. Personnel Complaints which states: *“Complaints that are not of a criminal nature shall be accepted by the Spokane Police Department up to one year from the date of occurrence consistent with the Spokane Police Ombudsman ordinance”*. However, the allegations in #C20-074 were only recently reported to the department for the first time. The City promptly initiated an investigation in accordance with Article 24, Section E (12) once it became aware of the information. Additionally, the newly discovered matter occurred during the same timeframe as I.A. investigation #C15-085 and is of a similar context, involving a complainant of a domestic dispute-related call that led to inappropriate sexual encounters. Because of the nexus, the department also has a need to investigate to determine whether there was any dishonesty based upon responses Cpl. Conrath provided in the prior #C15-085 investigation.

As expressly provided in Article 24, *“Both parties agree that the carrying out of departmental Policy and Procedures is exclusively the province of the Chief of Police.”* This is critical in a case such as this where serious allegations and of a potential criminal nature have only recently been discovered and to ignore them would be an abdication of our responsibility to all involved.

For these reasons, the City believes the investigation is in accordance with the collective bargaining agreement and the principles of just cause. Therefore, this grievance is denied.

Sincerely,

Scott Simmons
Interim City Administrator

CC: Craig Meidl, Police Chief
Meghann Steinolfson, 2Labor Relations Manager

Heath, Tisha

From: Meidl, Craig
Sent: Thursday, January 21, 2021 8:45 PM
To: Pearson, Kelsey
Subject: Chris Conrath passover

Follow Up Flag: Follow up
Flag Status: Flagged

Kelsey

Per our conversation, I am going to pass over Cpl Chris Conrath, who is next up on the Sergeant's list, for cause.

Based on behavior five and a half years ago, in which discipline was administered, and the learning of inappropriate behavior six months ago regarding similar inappropriate behavior that paralleled the other behavior five and a half years ago with a different female (the most recent behavior has 2 sustained allegations, and 2 allegations with insufficient evidence to sustain but likely occurred according to the ARP review), further complicated by at least 4 other complaints (within the past two years) involving different females that weren't substantiated but indicate a disturbing pattern, prudence indicates he should not be promoted to a Sergeant's position.

Respectfully,
Craig Meidl

Personnel Complaints

1020.1 PURPOSE AND SCOPE

The purpose of this procedure is to provide guidelines for the reporting, investigation and disposition of complaints regarding the conduct of members and employees of this department.

1020.1.1 PERSONNEL COMPLAINTS DEFINED

Personnel complaints consist of any allegation of misconduct or improper job performance against any department employee that, if true, would constitute a violation of department policy, federal, state or local law.

Office of Police Ombudsman (OPO) Involved Investigation - is defined as an IA investigation where the complaint giving rise to the investigation, whether made to the Department or the OPO, is a complaint of a serious matter (complaints that could lead to suspension, demotion or discharge) involving allegations that an employee either improperly used force or improperly/inappropriately interacted with citizens.

Personnel Complaints shall be classified in one of the following categories:

Administratively Suspended Investigation – An investigation which, after appropriate follow-up and review by the Internal Affairs Lieutenant, is not sent for review by an employee's Chain of Command or an Administrative Review Panel for one or more of the following reasons:

- A. The complaining party refuses to cooperate,
- B. The complaining party becomes unavailable and further contact is necessary to proceed,
- C. The complaint involves the elements of a crime pending prosecution and the administrative investigation could adversely impact the criminal case,
- D. The complaint involves an incident where a civil suit or claim for damages has been filed against the City and has not been resolved.
- E. A minor allegation sent to the employee's supervisor for informal follow-up (i.e. driving, demeanor, response time, etc.).

Suspended Investigations may be reactivated, if the above circumstances change, in accordance with the employee's collective bargaining agreement. Suspended investigations are sent to the OPO for review.

Closed – Investigations may be classified as Closed if they meet one or more of the following reasons:

- A. An allegation of misconduct that is disproven upon initial review (i.e. BWC footage or other evidence clearly disproves an allegation); and/or
- B. The accused officer leaves employment.

Personnel Complaints

An allegation classified as a Closed investigation shall be deemed closed and will be in lieu of a chain of command or ARP review. Closed investigations are sent to the OPO for review.

Complaint - A matter in which the complaining party requests further investigation or which a department supervisor determines that further action is warranted. Such complaints may be investigated by a department supervisor of rank greater than the accused employee or referred to the Internal Affairs Unit depending on the seriousness and complexity of the investigation.

The Spokane Police Department does not accept complaints involving:

- A. The elements of a criminal case which has already been before the court and resulted in a conviction or guilty plea; or
- B. An active civil claim against the Spokane Police Department and/or the City of Spokane

Inquiry - Questions about employee conduct which, even if true, would not qualify as a personnel complaint may be handled informally by a department supervisor and shall not be considered complaints.

Mediation - Is a voluntary process and an alternative to investigation, adjudication and the disciplinary process. Mediation requires agreement by both the officer(s) and the complainant.

1020.2 AVAILABILITY AND ACCEPTANCE OF COMPLAINTS

1020.2.1 AVAILABILITY OF COMPLAINT FORMS

Personnel complaint forms in a variety of languages will be readily available at the Spokane Police Department front desk, on the Spokane Police Department's Office of Accountability web page, or at the Office of Police Ombudsman.

1020.2.2 SOURCE OF COMPLAINTS

- A. Department employees aware of alleged misconduct shall immediately notify a supervisor
- B. Any source alleging misconduct of an SPD employee which, if true, could result in disciplinary action shall be directed to a supervisor or Internal Affairs.
- C. Anyone may file a complaint directly with Internal Affairs or the Office of Police Ombudsman.
- D. Anonymous complaints and third party complaints will be accepted and investigated to the extent that sufficient information is provided.

1020.2.3 ACCEPTANCE OF COMPLAINTS

A complaint may be filed in person, in writing, online, or by telephoning the department. Although not required, every effort should be made to have the complainant appear in person. The following should be considered before taking a complaint:

Personnel Complaints

- A. When an uninvolved supervisor determines that the reporting person is satisfied that their complaint required nothing more than an explanation regarding the proper implementation of department policy or procedure, a complaint need not be taken.
- B. When the complainant's credibility appears to be unreliable, the person should be provided with a Citizen Complaint form or a supervisor may take the complaint and cite their concerns.
- C. Depending on the urgency and seriousness of the allegations involved, complaints from juveniles should generally be taken only with their parent(s) or guardian(s) present and after they have been informed of the circumstances prompting the complaint.
- D. Complaints that are not of a criminal nature shall be accepted by the Spokane Police Department up to one year from the date of occurrence consistent with the Spokane Police Ombudsman ordinance.
- E. If the complaint is of a minor policy violation (demeanor, inadequate response, etc.) and the alleged violation can clearly be proven false by evidence (body camera footage, non-biased witnesses, etc.) available to the supervisor taking the complaint, no BlueTeam report is necessary. The supervisor should document the allegation and pertinent information in a manner that will allow him/her to access that information at a later time if needed.
- F. Any complaint of a serious nature, regardless of whether the receiving supervisor believes the allegation to be false, will be documented in BlueTeam and forwarded to IA for investigation.

1020.2.4 COMPLAINT DOCUMENTATION

Complaints of alleged misconduct shall be documented by a supervisor in (BlueTeam). The supervisor shall ensure that the nature of the complaint is defined as clearly as possible.

When a Personnel Complaint form is completed in person, the complainant should prepare a detailed narrative of his/her complaint. If circumstances indicate that this is not feasible, the complaint may be dictated to the receiving supervisor. In an effort to ensure accuracy in any complaint, it is recommended, if practicable, that a recorded statement be obtained from the reporting party. A refusal by the complainant to be recorded shall not alone be grounds to refuse to accept a complaint.

1020.3 SUPERVISOR RESPONSIBILITY

In general, preliminary and follow-up investigative responsibility for some administrative complaints shall rest with the employee's immediate supervisor. The Chief of Police or authorized designee may, however, direct that another supervisor, Internal Affairs, or Human Resources, investigate the complaint. The supervisor shall be responsible for the following:

- A. Receiving a complaint involving allegations of a potentially serious nature shall ensure that the Shift Commander is notified as soon as practicable.

Personnel Complaints

- B. Receiving or initiating a complaint, or conducting a preliminary investigation, shall ensure that a BlueTeam entry has been completed as fully as possible to include the names and contact information of all involved parties and witnesses, collection of evidence, photographing of alleged injuries as well as areas of non-injury, etc. The supervisor will send the complaint to Internal Affairs by the end of his/her shift. The Internal Affairs Lieutenant will determine if the allegation is criminal or administrative. If the allegation is criminal, the Internal Affairs Lieutenant will notify the Director of Strategic Initiatives and the Chief of Police. A decision will then be made as to the proper method of investigation.
- C. When the nature of a personnel complaint relates to sexual, racial, ethnic, or other forms of prohibited harassment or discrimination, the supervisor shall immediately contact the shift commander, who will make other notifications in accordance with the DSO policy, if necessary. Internal workplace complaints of this nature will be investigated by Human Resources in coordination with the department's Internal Affairs Unit. The Internal Affairs Unit will ensure that all complaints/investigations are documented, monitored, and reviewed for thoroughness and objectivity.

1020.4 ASSIGNMENT TO ADMINISTRATIVE LEAVE

The Chief of Police may elect to place an employee on administrative leave when circumstances dictate such leave to be in the best interest of the department.

1020.4.1 ADMINISTRATIVE LEAVE

An employee placed on administrative leave may be subject to the following guidelines:

- A. Under such circumstances, an employee placed on administrative leave shall continue to receive regular pay and benefits pending the imposition of any discipline.
- B. An employee placed on administrative leave may be required to relinquish any badge, departmental identification, assigned weapon(s) and any other departmental equipment.
- C. An employee placed on administrative leave may be ordered to refrain from taking any action as a departmental employee or in an official capacity. The employee shall be required to continue to comply with all policies and lawful orders of a supervisor. The employee shall be available to the department by phone and considered in a working status from home during normal business hours, 8:00 am to 4:00 pm., Monday through Friday.
- D. At the discretion of the Chief, as an alternative to administrative leave, the employee may be temporarily reassigned to a different shift (generally normal business hours) during the pendency of the investigation and the employee may be required to remain available for contact at all times during such shift and to report as ordered.
- E. The Chief of Police or designee is authorized to place an employee on administrative leave.

1020.5 ALLEGATIONS OF CRIMINAL CONDUCT

When an employee of this department is accused of potential criminal conduct, a separate supervisor or assigned investigator shall be assigned to investigate the criminal allegations apart

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6 CITY OF SPOKANE
7 CIVIL SERVICE COMMISSION

8
9 CHRISTOPHER CONRATH,

10 Appellant,

11 v.

12 CITY OF SPOKANE,

13 Respondent.
14

**CITY OF SPOKANE'S PREHEARING
BRIEF, WITNESS LIST, AND
EXHIBITS**

15 The City of Spokane ("City") submits the following prehearing brief for the assistance of
16 the Civil Service Commission.
17

18 **I. ISSUE PRESENTED**

19 Did Chief Craig Meidl have cause to pass over Corporal Christopher Conrath ("Cpl.
20 Conrath")¹ for promotion to sergeant?

21 **II. SUMMARY OF CITY'S POSITION**

22 On September 7, 2015, Cpl. Conrath received a 30-day suspension for having a sexual
23 relationship with Ms. Ya Qun Sun (aka Erika Roundtree), who he met when responding to her
24
25

26 ¹ Cpl. Conrath was an officer at the time of the discipline. I refer to him as Cpl. Conrath
throughout the brief because that is his current rank.

1 domestic violence call. When interviewed during the investigation, Cpl. Conrath portrayed his
2 actions as an isolated, big mistake that he would not repeat again. On September 11, 2020, the
3 husband of a second woman complained that Cpl. Conrath had a sexual relationship with his
4 wife, Ms. E,² after she called police on May 27, 2015, to report property damage by him during
5 their divorce proceedings. Mr. E provided calendars kept by Ms. E in 2015 and 2016 with
6 handwritten entries suggesting that Cpl. Conrath was in a sexual relationship with his wife
7 before, during, and after the time period Cpl. Conrath was under investigation for his relationship
8 with Ms. Sun. Mr. E's complaint raised new concerns about Cpl. Conrath's behavior with
9 vulnerable woman, as well as concerns with his honesty during the 2015 Sun investigation.
10 Based on Mr. E's description of his wife's severe alcohol abuse and mental illness in 2015 and
11 2016, there were also concerns whether Cpl. Conrath's sexual relationship with her could have
12 been criminal in nature.
13

14
15 At the conclusion of the 2020 investigation, Cpl. Conrath was found to have violated
16 Spokane Police Department ("SPD") Policy 1050.2D (developing and maintaining a personal
17 relationship with an individual as a direct result of any official contact) and SPD Ethical
18 Standard 4.9 (conduct unbecoming). Although Ms. E testified otherwise, and had calendar
19 entries from 2015 and 2016 to corroborate her testimony, there was insufficient evidence to find
20 that he violated SPD Policy 340.3.2M (engaging in sexual relations on duty) or SPD Policy
21 340.3.5P (dishonesty during a work-related investigation).
22
23
24

25 ² The complainant and his wife have requested that their names be redacted from documents
26 that are public records subject to disclosure. In this brief, they are referred to as Mr. E and Ms.
E. Exhibits containing their names have also been redacted.

1 While Chief Meidl did not impose a disciplinary sanction on Cpl. Conrath for the above-
2 described policy violations, he did take the violations and Cpl. Conrath's conduct into
3 consideration when deciding whether to promote Cpl. Conrath to sergeant. He also considered
4 other recent investigations into allegations of Cpl. Conrath's behavior with female residents and
5 coworkers that, while not sustained, gave rise to concerns that Cpl. Conrath was not ready for
6 additional supervisory authority. Sergeants are given greater responsibility, discretion, and
7 authority. In the role of sergeant, Cpl. Conrath would have supervisory authority over female
8 officers and other female coworkers. Sergeants also serve as role models for subordinate
9 officers. Chief Meidl decided that he could not in good conscience promote Cpl. Conrath to the
10 position of sergeant due to the new information received about him that strongly suggested he
11 was not ready for the position and the responsibility it entailed.
12

13
14 Cpl. Conrath appealed the decision not to promote him as being in violation of SPD
15 Policy 1020.2.3(d). It is Cpl. Conrath's position that his conduct toward Ms. E could not be
16 considered because it occurred more than one year before Mr. E complained about it. The City
17 offers the following rebuttals to Cpl. Conrath's position, explained more fully below:

- 18 (a) Policy 1020.2.3(d) does not preclude investigation in this situation. Instead, the
19 Commission should look also to Policy 1020.2.3(f), which requires "any
20 complaint of a serious nature" to be "forwarded to IA for investigation."
21 Complaints of a serious nature are ones that could result in suspension, demotion,
22 or termination. Mr. E's complaint against Cpl. Conrath was certainly of a serious
23 nature due to the conduct at issue, which had previously resulted in a 30 day
24 suspension. There is no one year limitation contained in Policy 1020.2.3(f). The
25 only sensible way to harmonize these two subsections of Policy 1020.2.3 is to
26

1 allow for investigations of serious allegations even when the conduct at issue
2 occurred more than a year ago.

3 (b) Mr. E's complaint raised the issue of whether Cpl. Conrath was dishonest during
4 the Sun investigation when he stated that his relationship with Ms. Sun was a big
5 mistake that he would never repeat. Due to *Brady* issues, Chief Meidl's concerns
6 of dishonesty could not be disregarded simply because Cpl. Conrath concealed his
7 dishonesty for more than one year.

8
9 (c) As a matter of public policy, a blanket prohibition on investigating complaints
10 that are over 1 year past the incident makes no sense, particularly when applied to
11 police officers who hold positions of authority sufficient to dissuade complainants
12 from coming forward sooner. Here, Ms. E stated that Cpl. Conrath contacted her
13 after there was news coverage of his discipline for his sexual relationship with
14 Ms. Sun to persuade her not to report her relationship with him, likely because he
15 knew that his law enforcement career would be over if his relationship with Ms.
16 Sun was not an isolated, big mistake, as he portrayed it.

17
18 Cpl. Conrath appears to believe that he is forever barred from being promoted to
19 sergeant. This is not true. He is eligible to be promoted off the next promotion list if he places
20 high enough, just like any other officer. Nor has Chief Meidl disqualified him from further
21 consideration. Chief Meidl believes that Cpl. Conrath needs more time to demonstrate he
22 deserves the additional authority and responsibility that comes with the position before he is
23 promoted to sergeant.
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1. Chief Craig Meidl

2. Assistant Chief Justin Lundgren

3. Director of Strategic Initiatives Jacqui MacConnell

4. Captain Tracie Meidl

IV. EXHIBITS

CITY OF SPOKANE'S PREHEARING BRIEF, WITNESS
LIST, AND EXHIBITS - 5

- 6 Sgt. Dollard investigation report regarding E. investigation
- 7 Calendars of Ms. E (and documents annotating and summarizing
- information on calendars)
- 8 Email from Mr. E regarding complaint
- 9 SPD Policy 1020.2.3
- 10 Transcript from interview of Ms. E (first interview)
- 11 Transcript from interview of Ms. E (second interview)
- 12 Transcript from interview of Cpl. Conrath in E. investigation
- 13 Text from Ms. E regarding last communication with Cpl. Conrath
- 14 SPD Policy 1050
- 15 SPD Policy 340
- 16 ARP report regarding E. investigation
- 17 Disciplinary findings regarding E. investigation
- 18 Reprimand in Investigation C18-014
- 19 Counseling in Investigation C18-096
- 20 Findings in C19-015 investigation
- 21 Email from Chief regarding Passover decision
- 22 Letter from Joe Kuhlmann regarding appeal
- 23 Spokane Municipal Code 04.32.020
- 24 Emails between Cpl. Conrath and Ms. Sun

V. FACTUAL BACKGROUND

On July 1, 2010, Cpl. Conrath was hired as a police officer for the City. On February 9, 2020, Cpl. Conrath was promoted to the position of corporal.

1 A. Ya Qun Sun allegations (2015)

2 On September 7, 2015, Cpl. Conrath responded to a 911 domestic violence call from Ms.
3 Sun. Ms. Sun alleged that her husband, Brent Roundtree, had physically assaulted her while they
4 were in their car. Cpl. Conrath interviewed Ms. Sun and concluded that there was no probable
5 cause for a crime. Spokane Exh. 1. Ms. Sun later contacted him and stated she could not stop
6 thinking about him. Cpl. Conrath initially responded that it was inappropriate for him to have
7 “any interaction with her outside of [his] professional capacity.” Spokane Exh. 24. They
8 continued to text and email, and on September 9, 2015, he arranged to meet her at a hotel after
9 his shift and they engaged in sexual activity. He also encouraged her numerous times to leave
10 her husband. On September 16, 2015, Mr. Roundtree saw salacious messages between his wife
11 and Cpl. Conrath on her iPad and contacted the department with a complaint about Cpl.
12 Conrath’s conduct with his wife. Spokane Exh. 2.
13

14 Cpl. Conrath was found to have violated SPD Policies 340.2(I)/1050.1 for having a
15 sexual relationship with a person he met on duty, and Canon 4.9/Policy 340.3.2(I) for conduct
16 unbecoming. Chief Rick Dobrow suspended Cpl. Conrath for 30 days for the violations.
17 Spokane Exh. 3. On January 13, 2016, local media publicized Cpl. Conrath’s suspension and the
18 reasons for it. Spokane Exh. 4.
19

20 During his investigative interview, Cpl. Conrath stated he cut off contact with Ms. Sun
21 because he realized it was “a stupid thing.” He also stated: “All I would add is that I freely
22 recognize that this was my wrongdoing and I made a big mistake and I take responsibility for it.
23 This kind of thing would never happen again to me.” Spokane Exh. 5
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26

1 **B. E Allegations**

2 On May 27, 2015, Ms. E called 911 to report damage to her sprinkler system. At the
3 time, she was in the middle of a nasty divorce proceeding and suspected that her husband, Mr. E,
4 had caused the damage. Cpl. Conrath responded to the call and informed her that the damage
5 was caused by other means. He then offered to return over the weekend when he was off duty to
6 fix the sprinkler system. By June 6, 2015, Cpl. Conrath spent the night with her and began a
7 sexual relationship. Spokane Exh. 6.
8

9 On September 11, 2020, Mr. E had reunited with his former wife, and found calendars
10 with handwritten notes on them that she had kept in 2015 and 2016. According to the calendars,
11 the relationship between Cpl. Conrath and Ms. E began on May 27, 2015, when she called 911,
12 and continued until January 16, 2016, which was shortly after the news coverage regarding Cpl.
13 Conrath's discipline for his sexual relationship with Ms. Sun. Spokane Exh. 7. Mr. E called
14 SPD to make a complaint, though he was conflicted about Ms. E participating in an
15 investigation. One of the reasons for their divorce was Ms. E's rampant alcohol abuse at the
16 time. In the year prior to the affair with Cpl. Conrath, Ms. E had been arrested for DUI, had at
17 times a blood alcohol level of 0.40, and had been involuntarily committed twice for mental
18 health reasons. Although he believed that Cpl. Conrath had taken advantage of his wife during a
19 very vulnerable period, he was concerned that any interview of her would destabilize her.
20
21 Spokane Exh. 8.
22

23 There was discussion among Chief Meidl and his executive team as to how to respond to
24 Mr. E's complaint. Chief Meidl was aware of the union's position that Policy 1020.2.3(d) did
25 not allow investigations when the allegations pertained to an incident that occurred more than
26 one year before the complaint. Spokane Exh. 9. Under the circumstances present here, however,

Chief Meidl, Asst. Chief Justin Lundgren, and Director of Strategic Initiatives Jacqui MacConnell concluded that an investigation was warranted and necessary for the following reasons:

1. Issue of dishonesty. There was an issue of whether Cpl. Conrath was dishonest during the Sun investigation. In his interview, he stated that his sexual relationship with Ms. Sun was a big mistake that he would not repeat. According to the calendars produced by Mr. E, Cpl. Conrath was simultaneously in a sexual relationship with Ms. E that continued for three months after he stated he would never do it again. Mr. E's allegations could make Cpl. Conrath a *Brady* officer, by which evidence of his dishonesty must be turned over to defense attorneys before he is called to testify. There is no time limitation for investigating potential *Brady* material.
2. Potential criminal misconduct. There was some concern that Cpl. Conrath may have committed criminal misconduct based on Mr. E's statements that his wife had very serious mental health and alcohol abuse issues at the time of the relationship.
3. Pattern of serious misconduct. The allegation of Mr. E was a very serious allegation of misconduct that could result in demotion, suspension, or termination. This would be true if it was the first time such an allegation was made against him. It was particularly true here since there was another similar allegation involving another vulnerable woman when the involved officer made assurances that no other similar situations had occurred.

Ms. MacConnell referred the investigation to Sgt. Art Dollard, who interviewed Mr. E, Ms. E, and Cpl. Conrath. Ms. MacConnell participated in the interview of Ms. E due to the sensitive nature of the situation. Spokane Exh. 10 (Ms. E interview transcript, first interview); Spokane Exh. 11 (Ms. E interview transcript, second interview); Spokane Exh. 12 (Cpl. Conrath interview transcript). During the second interview, Ms. E testified that she kept her calendars, as a lifelong practice, contemporaneous with the events. Based on her calendars and her memories, she stated that they had sexual relations both before and after Cpl. Conrath was interviewed for the Sun investigation on October 7, 2015 (the day he told the investigator that it was a big

1 mistake he would never repeat). She also stated that she believed they had sex on at least one
2 occasion when he was on duty. Ms. E's testimony did not give rise to any concerns that she was
3 not capable of consenting at the time due to alcohol abuse or other mental health issues. Ms. E
4 recalled her last communication with Cpl. Conrath occurring on January 16, 2016, which was
5 when Cpl. Conrath sought and received her assurance that she would not complain about him to
6 the department. Spokane Exh. 13.

8 After Sgt. Dollard completed the investigation, Asst. Chief Lundgren and Director
9 MacConnell forwarded the investigation to ARP for review. Capt. Dave Richards, Capt. Tracie
10 Meidl, and Lieut. Kurtis Reese³ were the members of the ARP pod who were assigned Capt.
11 Meidl wrote up the report from the ARP, which recommended the following findings:

12 Sustained:

- 13 1. Violation of Policy 1050.2(d)—developing and maintaining a personal
14 relationship with an individual as a direct result of any official conduct. The facts
15 regarding this violation were admitted to by Cpl. Conrath. He met Ms. E after
16 responding to a call for service. They commenced a sexual relationship shortly
17 thereafter. Spokane Exh. 14.
- 18 2. Violation of Standard 4.9—conduct unbecoming. The facts regarding this
19 violation were also admitted by Cpl. Conrath; commencing a sexual relationship
20 with a vulnerable woman met on duty brings shame and disrepute to the
21 department. The fact that Ms. E was married, in the midst of a nasty divorce, and
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23
24
25

26 ³ Two members of the ARP pod, Lieut. Wohl and Lieut. Overhoff, recused themselves and did not participate in the ARP process.

1 had alcohol and mental health issues at the time only enhanced the level of
2 disgrace. Spokane Exh. 15.

3 Non-sustained:

- 4
- 5 1. Violation of Policy 340.3.2(m)—having sexual relations on duty. Ms. E stated
6 that she believed Cpl. Conrath and she had sexual relations at least once when he
7 was on duty and in uniform. Cpl. Conrath denied it. Ms. E ’s calendars revealed
8 the days she spent time with Cpl. Conrath, but provided no details of whether
9 sexual activity happened on those days. Although there was a split of opinion on
10 this issue, the ARP pod ultimately decided that there was insufficient evidence,
11 using a “clear and convincing standard,”⁴ to recommend a policy violation.
12 Spokane Exh. 15.
- 13
- 14 2. Violation of Policy 340.3.5(p)—dishonesty during the prior investigation. Ms. E
15 stated that the sexual relationship continued, on at least one occasion, after
16 October 7, 2015, when Cpl. Conrath was interviewed about the Sun relationship
17 and said he made a big mistake that would not happen again. Cpl. Conrath denied
18 any sexual contact with Ms. E after he learned of the allegations against him in
19 the Sun investigation. Interestingly, Cpl. Conrath conceded that Ms. E ’s
20 testimony and her calendar entries were 100% accurate before October 7, 2015,
21

22

23 ⁴ “Clear and convincing” is a burden of proof between “preponderance of the evidence” and
24 “beyond a reasonable doubt.” “Preponderance of the evidence,” which is used in most civil
25 matters, is satisfied when the jury finds that it is more likely than not that the factual allegation is
26 true. “Beyond a reasonable doubt” is satisfied when the jury finds is that it has no reasonable
doubt that the factual allegation is true. This is a much higher burden of proof which is used in
criminal matters because of a societal determination that it is preferred to let a guilty person go
free rather than incarcerate an innocent person. “Clear and convincing” is satisfied somewhere
in the middle between preponderance and beyond a reasonable doubt.

1 but for the period after October 7, 2015, he accused her of lying. Again, the ARP
2 pod, without corroborating information, did not believe they had sufficient
3 evidence to recommend a violation here, though it was remarked that Ms. E had
4 not made the complaint and had no apparent reason to lie. Spokane Exh. 15.

5 The ARP report was forwarded to Chief Meidl and his executive team for their review.
6
7 Spokane Exh. 16.

8 On January 21, 2021, Interim City Administrator Scott Simmons and Chief Meidl
9 scheduled a *Loudermill* hearing before making final decisions on whether policy violations
10 should be sustained and disciplinary action should be taken. At the *Loudermill* hearing, Cpl.
11 Conrath took the position that the investigation was unwarranted under Policy 1020.2.3(d). He
12 did not address the wrongfulness of his conduct or the shame it brought on to the department.
13 After hearing from Cpl. Conrath and his union, and consulting with Asst. Chief Lundgren and
14 Director MacConnell and other members of Chief Meidl's executive team, Mr. Simmons and
15 Chief Meidl decided to accept the recommended findings of the ARP regarding policy violations.
16 Because the investigation did not result in violations of criminal misconduct or findings of
17 dishonesty, Mr. Simmons and Chief Meidl cited Policy 1020.2.3(d) and imposed no disciplinary
18 sanction. Spokane Exh. 17.
19

20
21 C. Pass Over For Promotion to Sergeant.

22 At the same time as Chief Meidl was contemplating what disciplinary action to take
23 based on the E investigation and ARP report, he was also considering Cpl. Conrath for a
24 promotion to sergeant. Again, Chief Meidl consulted with Asst. Chief Lungren, Director
25 MacConnell, and other members of his executive team on the promotional decision. In the end,
26 Chief Meidl concluded that it would not be prudent to promote Cpl. Conrath at this time. The

1 position of sergeant is an important one. The sergeant bears responsibility for the safe, effective,
2 and efficient operation of his/her patrol team. The position comes with power, authority, and
3 discretion over both coworkers in the SPD and members of the public. In the position of
4 sergeant, Cpl. Conrath would be in the position of being a supervisor over female subordinates,
5 including new recruits to the SPD. Moreover, the position serves as a role model for officers and
6 corporals in the SPD. In addition to the E investigation, which demonstrated that Cpl. Conrath's
7 pursuit of vulnerable women he met on the job was not an isolated incident, there were other
8 issues in the background that generated ancillary concerns regarding his performance and
9 judgment.
10

11 In 2018, Cpl. Conrath was given a written reprimand for violation of SPD Policy 804.3
12 (property handling) and SPD Policy 344.1.1 (report preparation) for improperly disposing of a
13 suspect's property without any mention in the report of what he had done. Spokane Exh. 18.
14 Also in 2018, Cpl. Conrath was counseled for responding to a theft call where the victim clearly
15 reported domestic violence occurring that night, but Cpl. Conrath failed to document the
16 complaint or take any action on it. Spokane Exh. 19. In 2019 there was an allegation of an
17 inappropriate relationship between Cpl. Conrath and a college student working with the SPD to
18 gain experience. The college student declined to participate in the investigation and there was no
19 finding. Spokane Exh. 20. In October 2020, the Criminal Justice Training Commission
20 investigated a complaint about Cpl. Conrath that he was behaving inappropriately (e.g.,
21 unnecessary touching and excessive attention) with a female recruit to the SPD. Though the
22 investigation resulted in no findings, the CJTC still excluded him from serving as one of their
23 firearms instructors.
24
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26

1 On January 21, 2021, Chief Meidl informed Kelsey Pearson by email that he was passing
2 over Cpl. Conrath for the position of sergeant. Spokane Exh. 21. On January 26, 2021, Joe
3 Kuhlman, counsel for Cpl. Conrath, notified the Civil Service Commission that appealing the
4 pass over, stating that it “violates Spokane Police Department Policy 1020.2.3(d) on pp. 509-509
5 of Spokane Police Department’s Manual dated 10/09/2019. Spokane Exh. 22.
6

7 **VI. DISCUSSION OF POLICY 1020.2.3**

8 This appeal hearing is unusual in that it involves an interpretation of department policy in
9 addition to findings of fact. It is Cpl. Conrath’s position that the investigation into the E
10 allegation was prohibited by Policy 1020.2.3(d), and therefore he must be promoted to sergeant
11 because the violations were considered by Chief Meidl in his decision. For the following
12 reasons, the Commission should apply the City’s interpretation of Policy 1020.2.3 in its decision
13 here:
14

15 **A. Policy 1020.2.3(f) does permit the investigation.**

16 Policy 1020.2.3 has six subsections that concern the acceptance of complaints. Policy
17 1020.2.3(d) provides:

18 Complaints that are not of criminal nature, shall be accepted by the Spokane Department
19 up to one year from the date of occurrence consistent with the Spokane Police Department
20 Ombudsmen ordinance.
21

22 If Policy 1020.2.3 ended there, Cpl. Conrath’s interpretation would carry more sway. It
23 does not. Two subsections down, Policy 1020.2.3(f) provides:

24 Any complaint of a serious nature, regardless of whether the receiving supervisor
25 believes the allegation to be false, will be documented in BlueTeam and forwarded to IA for
26 investigation.

1 Spokane Exh. 9. Spokane Municipal Code 4.32.020(N) defines “serious matter” as “any
2 complaint that could lead to suspension, demotion, or discharge.” Spokane Exh. 24. Unlike
3 Policy 1020.2.3(d), Policy 1020.2.3(f) contains no time limitation for the acceptance of
4 complaints. Instead, it requires “**any** complaint of a serious nature . . . [to be] forwarded to IA
5 for investigation.” (Emphasis supplied). That is exactly what happened here.
6

7 There are rules that courts apply when interpreting policies: (1) clear and unambiguous
8 policy language must be enforced as written, and (2) the entire policy must be construed together
9 so as to give force and effect to each clause. Transcontinental Ins. Co. v. Washington Pub. Utils
10 Dists. Util Sys., 111 Wn.2d 452, 456, 760 P.2d 337 (1988) (applying the rule to the interpretation
11 of language in an insurance policy). Here, there is a way to satisfy both rules of construction and
12 harmonize the two subsections.
13

14 (a) For non-criminal and non-serious allegations, Policy 1020.2.3(d) applies.

15 (b) For all serious allegations, Policy 1020.2.3(f) applies.

16 As a matter of policy, this makes logical sense and balances the interests of police
17 officers, the City, and the public. Because most allegations against police officers are neither
18 criminal nor serious (e.g., rudeness, not taking complaints seriously), most of the allegations that
19 arise more than 1 year after the incident will not result in investigation. However, when the
20 allegation is serious, the officer should not escape accountability simply because the complaint
21 was received 366 days after the occurrence. The reason why such a delay should not be
22 dispositive is apparent on the facts in the E allegation. Cpl. Conrath had a relationship with a
23 woman suffering from alcohol addiction, mental illness, and a dissolving marriage. This is not
24 someone who could be counted on to make a timely complaint even if she believed, as she said
25 she did, that the relationship was inappropriate. Moreover, she stated that Cpl. Conrath
26

1 contacted her to persuade her not to say anything about the relationship, likely because he knew
2 he would have been terminated if she had come forward in a more timely way. Police
3 department policies should not be interpreted in a way that rewards such conduct.
4

5 **B. The E allegation involved potential dishonesty.**

6 Police officers who are found to be dishonest suffer two negative consequences. The first
7 is serious discipline. In many situations the discipline is termination, as their credibility as
8 witnesses is paramount to their effectiveness as law enforcement officers. Every officer hears
9 “you lie, you die” at some point in the early stages of their career. The second is being labelled a
10 *Brady* officer, meaning that evidence of the officer’s dishonesty is made available to criminal
11 defense attorneys in cases where the officer is called to testify. The duty to disclose *Brady*
12 material to criminal defense attorneys arises out of the U.S. Constitution, and has no expiration
13 date. Even if the dishonesty occurred more than one year ago, the SPD has a constitutional
14 obligation to investigate potential dishonesty, and if the allegation has any merit, report the
15 results to the prosecutor so it can make a decision on *Brady*. Given what Cpl. Conrath stated
16 during his investigative interview in the Sun investigation, Chief Meidl was constitutionally
17 required to look into the matter.
18
19

20 **C. The E allegation involved potential criminal misconduct.**

21 Based on what Mr. E reported, at the time of the sexual relationship Ms. E had a
22 significant problem with alcohol abuse and mental illness that could have rendered her incapable
23 of consenting. When she was interviewed for the investigation, Ms. E did not provide any
24 information supporting an allegation of criminal misconduct. While her memories of the events
25 were imperfect, that was due to the passage of time and not, in her view, due to any blackouts,
26 incapacity, or other conditions that rendered her unable to consent. At the time the matter was

1 being investigated, however, it was unknown how Ms. E would testify regarding this time of her
2 life.

3 Cpl. Conrath sees this matter as simple—under Policy 1020.2.3(d), the E investigation
4 should not have occurred, and because it was considered in the decision to pass him over for
5 promotion, Chief Meidl’s decision should be reversed. As demonstrated above, the analysis is
6 not so simple. The language of Policy 1020.2.3, the underlying circumstances, and issues of
7 public policy all allow for an investigation and consideration of the results of it.
8

9 VII. CONCLUSION

10 Cpl. Conrath believes he was treated unfairly when the E allegation was investigated and
11 considered in whether he should be promoted to sergeant. In contrast, after looking at all the
12 facts and circumstances, Chief Meidl took the only responsible action he could in passing over
13 Cpl. Conrath. This does not mean that Cpl. Conrath is forever disqualified from a promotion to
14 sergeant. But, given his history and a pattern of exercising poor judgment in his relationships
15 with vulnerable women, he is not properly made a sergeant now. The City will ask the Civil
16 Service Commission to decide Chief Meidl has cause for passing over Cpl. Conrath for the
17 position of sergeant.
18

19
20 DATED this 13th day of July, 2021.

21 Respectfully Submitted,

22 SUMMIT LAW GROUP PLLC
23 Attorneys for Defendant

24
25 By



26 Michael C. Bolasina, WSBA #19324
mikeb@summitlaw.com

SPOKANE EXHIBIT 1

INCIDENT REPORT

Spokane Police/Spokane County Sheriff

Page 1

AGENCY NAME/SUBSTATION SPD		EVIDENCE NUMBER		INCIDENT NUMBER 15-314385	
INCIDENT TYPE Domestic Violence		INCIDENT CLASSIFICATION #1 COURT ORDER VIOLATION		ATTEMPTED <input type="checkbox"/> INCIDENT CLASSIFICATION #2 ASSAULT-SIMPLE	
		INCIDENT CLASSIFICATION #3		ATTEMPTED <input type="checkbox"/> INCIDENT CLASSIFICATION #4	
		RESPONDING TO (Officer Assault)		ASSIGNMENT (Officer Assault)	
REPORTED ON Mon 09/07/2015 20:40	DATE/TIME	OCCURRED ON Mon 09/07/2015 20:00	DATE/TIME	OCCURRED TO Mon 09/07/2015 20:40	DISTRICT
DISPATCH TIME	ARRIVED TIME	CLEARED TIME	REPORT DATE 09/08/2015	REPORT TIME 02:06	EST. TOTAL PROPERTY LOSS
PRIMARY CHARGE					UCR/NIBRS CODE
LOCATION OF INCIDENT 3rd Avenue & Maple Street, Spokane, WA 99201				LOCATION NAME (IF APPLICABLE)	
SOLVABILITY FACTORS None					
RELATED INCIDENT NUMBERS					INCIDENT XREF
ADDITIONAL REPORTING OFFICERS None					
SUSPECTS <small>PS-Passenger, PE-Pedestrian, V-Victim, COM-Contact, IN-Individual, G-Girl, RO-Registered Owner, RI-Roadway, S-Suspect, V-Victim, Individual, V-Victim, Business, W-Witness, D-Driver, A-Arrested Person, CW-Owner of Property, C-Complainant, CV-Complainant's Victim, O-Other, G-Legal Guardian, B-Business, M-Missing, MR-Person Member</small>					
CODE S-1	NAME: LAST, FIRST, MIDDLE Roundtree, Brent J			SEX M	RACE/ETHNICITY W-White
HEIGHT 6'00"	WEIGHT 165	BUILD Medium	HAIR	EYES Gray	DESCRIPTORS
CONFIDENTIALITY <input type="checkbox"/>	ADDRESS: STREET, CITY, STATE ZIP 12514 S Clear Lake Road, Medical Lake, WA 99022			RESIDENTIAL STATUS	PHONE
PLACE OF EMPLOYMENT/SCHOOL/ ADDRESS				OCCUPATION	EMPLOYER PHONE
ADDITIONAL PHONES (Cell) 998-8801					
DRIVER'S LICENSE ROUNDBJ264M9		<input type="checkbox"/> FAKE	STATE WA	SOCIAL SECURITY NO. 616-10-2099	<input type="checkbox"/> FAKE OTHER ID
VICTIM/WITNESSES/OTHERS <small>PS-Passenger, PE-Pedestrian, V-Victim, COM-Contact, IN-Individual, G-Girl, RO-Registered Owner, RI-Roadway, S-Suspect, V-Victim, Individual, V-Victim, Business, W-Witness, D-Driver, A-Arrested Person, CW-Owner of Property, C-Complainant, CV-Complainant's Victim, O-Other, G-Legal Guardian, B-Business, M-Missing, MR-Person Member</small>					
CODE CV-1	NAME: LAST, FIRST, MIDDLE Sun, Ya Qun			SEX F	RACE/ETHNICITY A-Asian or Pacific
HEIGHT	WEIGHT	BUILD	HAIR	EYES	DESCRIPTORS
CONFIDENTIALITY <input type="checkbox"/>	ADDRESS: STREET, CITY, STATE ZIP 12514 S Clear Lake Road, Medical Lake, WA 99022			RESIDENTIAL STATUS	PHONE
PLACE OF EMPLOYMENT/SCHOOL/ADDRESS				OCCUPATION	EMPLOYER PHONE
ADDITIONAL PHONES (Cell) (509) 990-7999					
NARRATIVE					

On the listed date and time, I responded to the Conoco gas station at 3rd/Maple to a report of a

ID NO./NAME OF REPORTING OFFICER #1106 - Conrath, Chris	DISTRIBUTION
APPROVAL #607 - Meyer, Richard	DATE/TIME 09/08/2015 21:44

Incident Report #1

09/08/2015 21:52:50 445

INCIDENT REPORT CONTINUED
Spokane Police/Spokane County Sheriff

Page 2

INCIDENT CLASSIFICATION COURT ORDER VIOLATION	ATTEMPTED <input type="checkbox"/>	INCIDENT NUMBER 15-314385
---	---------------------------------------	-------------------------------------

domestic dispute.

Upon arrival, I contacted complainant/victim, Ya Qun Sun. She explained that she had been involved in an argument with her husband of five years, Brent Roundtree. The couple had been at a concert together earlier that night on the south hill. After the concert, they were driving northbound in the car when the conflict started. Ya Qun stated that she had no idea why Brent was angry. He yelled at her and repeatedly turned his head to spit on her. Ya Qun turned her body and held up her hands and feet to shield herself. Brent grabbed her right ankle with his hand and twisted. Ya Qun said that the twisting motion on her ankle joint hurt a great deal. There were no marks that I could see, but she stated that it felt like it was bruised. At about that time, they were near the intersection of 3rd/Maple. Ya Qun got out of the vehicle and Brent drove away, leaving her there alone.

Ya Qun continued by telling me that Brent is abusive toward her in that same manner on a daily basis. He says horrible things to her and spits on her often. She described a series of manipulative behaviors that he exhibits. She said that she wants to leave him, but is hesitant because they have two small children together.

Dispatch advised that there was a valid/served protection order between them where Brent was the Respondent. Upon reviewing the order, I learned that there were no contact restrictions. In effect, the order only prohibited Brent from committing a crime against Ya Qun. I advised her regarding the content of the existing order, and that if she was truly afraid for her safety she should consider having the order amended to restrict contact.

Ya Qun was given a crime victim card with the case number on it. A copy of the order is included with this report (15-2-02647-4).

At the time of this report, there is no PC for a crime. This report is for informational purposes only.

I CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

C. Conrath 1106

SPOKANE EXHIBIT 2



Spokane Police Department
Internal Investigation



CONFIDENTIAL – ADMINISTRATIVE REVIEW PANEL

I.A. # C15-085

Incident #: N/A

COMPLAINANT – Brent Roundtree

COMPLAINT TYPE – Conduct Unbecoming

OCCURRED – 9/7/15 to 9/15/15

LOCATION – Maple Street & 3rd Avenue

EMPLOYEES – Ofc. Chris Conrath #1066

On November 11, 2015 at 1530 hours an Administrative Review Panel was held to discuss this case. Present were:

- Capt. Dan Torok
- Lt. Alan Arnzen
- Lt. Mark Griffiths
- Lt. Dean Sprague (author)

COMPLAINT

Complaint was initiated by Brent Roundtree, received by Internal Affairs on Friday, 9-16-15. Allegations stemmed from an incident occurring Monday, 9/7/15 and the days immediately following. Brent states that police responded to a DVOPV call at 3rd & Maple where his wife YaQun Sun alleged that she had been assaulted by him during an argument in their vehicle. She'd then gotten out of the car and walked to 3rd & Maple when he drove away. There was a protection order in effect at the time. Officer Conrath responded and took a report from the incident, determining that there was no probable cause (#15-314385).

Roundtree further alleges that his wife and Ofc. Conrath then began calling, texting and e-mailing each other beginning approximately five hours after Ofc. Conrath cleared the call, and as the end result of a string of communications had then engaged in an inappropriate sexual relationship. Roundtree said he discovered evidence of the relationship after finding messages on his wife's I-Pad, which included one of Conrath and his wife agreeing to meet late at night at the Japanese Gardens. One of his wife's communications related to that meeting was asking

Ofc. Conrath, "do you want me to wear my sexy clothes?" Roundtree was able to identify a personal g-mail account used by Ofc. Conrath, and said that Conrath was telling his wife to leave him while Conrath was engaging in the inappropriate sexual relationship.

FACT PATTERN

On Monday, 9-7-15 at 2040 hours Crime Check received a call from YaQun Sun reporting that she had been spit on and yelled at by her husband Brent Roundtree about fifteen minutes prior, and that he had a protection order in effect as the respondent to protect her. She stated she got out of their car "near a bridge" and Brent drove off, leaving her downtown. Sun stated she walked to 3rd & Maple to call in the report. Based on CAD, Ofc. Chris Conrath dispatched himself en route to 3rd & Maple at 2042 hours to take the report, and arrived on scene at 2045 hours as the only officer on the call. Ofc. Conrath cleared the call with a 1A at 2233 hours, an hour and 48 minutes later. The narrative of Ofc. Conrath's report articulates that a determination was made that there was not probable cause for an arrest, that he advised her to consider having the current order amended to address the abuse issues she claimed, and that he gave her a crime victim card with the incident number on it.

At 0155 hours during the same work shift on 9-8-15 there is a CAD entry showing that Ofc. Conrath checked Sun's name though SPD database(s) at 0155, 0156 and 0157 hours. He shows to have logged off at 0220 hours.

At 0318 hours, approximately five hours after clearing the call, YaQun Sun (aka Erika Roundtree) e-mailed Ofc. Conrath's SPD e-mail to convey her thanks and leave her personal phone number. At 0340 hours Ofc. Conrath responded to her on his SPD e-mail with a "You're very welcome!" At 0425 hours YaQun e-mailed Ofc. Conrath's SPD e-mail with the comment, "I have to tell you. I can't stop thinking about you".

At 1254 hours Ofc. Conrath answered YaQun's personal e-mail from his SPD e-mail with an appropriate response, acknowledging the compliment but drawing a "perfectly clear" line between personal interactions and work related contacts, writing that "interaction outside my professional capacity would be inappropriate. I hope you understand".

At 1827 hours Ofc. Conrath called YaQun's personal cell phone from his SPD cell phone (509-795-4981) while on duty and talked for 2 minutes.

At 1901 hours YaQun responded apologetically to Ofc. Conrath's SPD e-mail, but then continued with "Just can't hide my feeling. Can you call me back? I lost the number in my car." At 2348 hours she wrote to Ofc. Conrath's SPD e-mail and apologized again, and again asks for Ofc. Conrath to call her, saying she washed his number off of her hand.

At 1917 hours Ofc. Conrath called YaQun's personal cell phone from his SPD cell phone while on duty and talked for 1 minute.

At 1919 hours Ofc. Conrath called YaQun's personal cell phone from his SPD cell phone while on duty and talked for 2 minutes.

At 2312 hours, Ofc. Conrath responded to assist on a DV order service at 2208 W. Pacific #7 in Browne's Addition, arriving on scene at 2319 hours. The other backup officer clears at 0020 hours, and the serving officer clears the call at 0023 hours. Ofc. Conrath clears at 0036 hours, 13 minute after the primary officer. The extra time showing on scene is explained by the fact that:

At 0020 hours on 9-9-15 Ofc. Conrath called YaQun's personal cell phone from his SPD cell phone while on duty and talked for 15 minutes. That would have him off the phone at 0035 hours, and then clear his call at 0036 hours.

At approximately 0100 Ofc. Conrath drove his patrol car to the parking area north of the Japanese Gardens while on duty and met with YaQun outside of their cars. She asked if she can hug him, and Ofc. Conrath does so. He told YaQun to leave her husband, she stated she will be staying in a hotel and invited Ofc. Conrath to meet her there. He received another hug and a kiss from her before returning to work.

After getting off work, Ofc. Conrath drove to the Mirabeau Hotel at Sullivan & I-90 at approximately 3-4 AM. He stated that YaQun and he engaged in mutual oral sex. It has been approximately 32 hours since the time of the initial DVOPV call.

On 9-15-15 Brent Roundtree finds messages between his wife YaQun and Ofc. Conrath of a personal nature, arranging their late night meeting at the Japanese Gardens and his wife asking if she should "wear my sexy clothes". He contacts SPD Internal Affairs to make a complaint.

E-MAILS

- 9-8-15 at 0318 hours, "Hey I want to say thank you thank you have a good night at work. Yaya 990-7999" (from Erika Roundtree to cconrath@spokanepolice.org)
- 9-8-15 at 0340 hours, "You're very welcome!" (from cconrath@spokanepolice.org to Erika Roundtree)
- 9-8-15 at 0425 hours, "I have to tell you. I can't stop thinking about you" (from Erika Roundtree to cconrath@spokanepolice.org)
- 9-8-15 at 1254 hours, "Yaya, I am flattered. I think that you are a very nice girl. I am happy to help you in any way that I can, especially when it comes to keeping you and your family safe. I need to make it perfectly clear though, that any interaction outside my professional capacity would be inappropriate. I hope you understand. Chris Conrath." (from cconrath@spokanepolice.org to Erika Roundtree)
- 9-8-15 at 1901 hours, "I do understand. Sorry about that. Don't mean anything. Just can't hide my feeling. Can you call back? I lost the number in my car." (from Erika Roundtree to cconrath@spokanepolice.org)
- 9-8-15 at 2348 hours, "im so sorry. I wash the number off my hand. Can you call me again? Sorry my bad Yaya (from Erika Roundtree to cconrath@spokanepolice.org)

PHONE CALLS

- 9-8-15 at 1827 hours: call from 509-795-4981 (Conrath's work cell) to 509-990-7999 (YaQun Sun aka Erika Roundtree) for 2 minutes.
- 9-8-15 at 1917 hours: call from 509-795-4981 (Conrath's work cell) to 509-990-7999 (YaQun Sun aka Erika Roundtree) for 1 minute.
- 9-8-15 at 1919 hours: call from 509-795-4981 (Conrath's work cell) to 509-990-7999 (YaQun Sun aka Erika Roundtree) for 2 minutes.
- 9-9-15 at 0020 hours: call from 509-795-4981 (Conrath's work cell) to 509-990-7999 (YaQun Sun aka Erika Roundtree) for 15 minutes.

Exerpts from COMPLAINANT Brent Roundtree

- When asked how he came to contact Internal Affairs, he stated that when his wife came home the next day yelling at him following the domestic incident, "she made a joke about meeting some nice guy yesterday".
- She was acting differently and protectively with her phone, and he thought she "might've had more than a yellow card contact with a police officer", and he said she "kind of conceded to that" before denying it again.
- On the 8th (the day after the incident) his son brought him his wife's phone after she'd been texting all day with it, and he saw the text "I got my house today, ladybug". He concluded

someone had a "pet name" for his wife, which she denied. He estimates this text was at about 10pm on 9-8-15. He also intimates that his wife has engaged or is engaging in other inappropriate relationships during their marriage and believed this text was indicative of one of them and became suspicious.

- He sees YaQun texting late at night, "Are you still awake?" and with a reply of "yep" she texts "Call me, then goes outside and locks herself in the van, talking to him on the phone". He estimates this call took place shortly after midnight on 9-9-15.
- When YaQun finished her call, she gave the phone to her son to watch Netflix on it. Brent states he got the phone from his son at about 1:30am and checked it to see who she'd been communicating with. She became angry over his having her phone and called SCSO following an argument about his accessing the contents of her cell phone, and deputies came out to the house at about 2am. When they left, she got in her car and left for an unknown destination.
- On 9-15-15 at 6pm, while waiting for YaQun to return to the van at Riverpark Square, he was able to access her cell phone when she left it unattended and found e-mail messages in a thread beginning approximately 9-11-15 from a person advising her to "leave him" (referring to complainant) for the safety of herself and her kids. The header on the e-mail was from the personal address chrisconrath@gmail.com.
- On 9-14-15 he was with his wife and they'd just gotten back home to the resort (they are caretakers), she had sent a message to Ofc. Conrath saying they were there. The time was about 11:30pm. Conrath answered from his gmail address, "Yes, would you like to meet me? Do you think you can find the Japanese Gardens outside of Manito Park?" Brent said the message had come in at midnight and it's a 45 minute drive into Spokane. Complainant said that the reason he was in IA was because Conrath was arranging a meeting in a park with his wife in the middle of the night.
- Complainant said he read his wife's response, "Should I wear my hot clothes?"
- Conrath replies, "Can you call me?"
- Complainant said he got the name from the g-mail account. His wife made some comments to him that "someone is watching over her more than they normally would". Then she had a long series of calls or texts while locked in her van, and hung up as soon as she saw him standing outside her window. Then when he wouldn't leave, she left in the van to an unknown destination.
- He considers Conrath's meeting at 1am with his wife as "highly inappropriate and unethical", and "given the domestic violence thing" is "kinda sick and twisted". His discovery of her texts, calls and e-mails were submitted as proof of the alleged relationship.

Excerpts from ACCUSED EMPLOYEE Chris Conrath's statements

Ofc. Conrath was interviewed as an accused employee on Tuesday, 10-6-14 by Sgt. Staben, and signed his Administrative Rights form at 1650 hours. Present for the interview as well were Sgts. John Gately and John Griffin, both representing the Spokane Police Guild. Ofc. Conrath provided the following relevant statements with regard to this investigation:

- In answer to the question, "So after taking that report, did you have any other contact with that woman? Chris answers, "she e-mailed me on my work e-mail and said "thank you for your help". I replied to that with a "you're welcome". She replied again with..."I can't stop thinking about you, which struck me as odd." Chris said he replied to that e-mail with, "I'm flattered, you know you're a very nice girl, but to interact with you outside of work would be inappropriate and I hope you understand."
- "I did speak with her again, two or three times on the work cell phone that's assigned to my patrol vehicle. She had that number. I spoke with her several times, work related material. She had questions about, you know, trying to separate from her husband, no contact orders..."
- "At some point...I spoke to her on the phone and she said she was in town and asked if I could meet her somewhere and so I said 'okay'. This was probably...after 1am, between one and two, right before the end of my shift and so I said 'yes, I can meet you'. We ended up meeting at the entryway to Japanese Gardens."
- "She was going to stay in a hotel...I don't recall if it was during that contact or during a subsequent phone contact, she invited me to meet her at the hotel, which I did after my shift was over."

- "Early on there was multiple phone calls in both directions and at some point I provided her with my personal e-mail address."
- With regard to the question about whether she instigated the phone calls, "I would say they were both ways. She had the car number and she might send me an e-mail saying 'can you call me?' And so I would call her. There are probably several outgoing and several incoming calls from that work phone that were made while I was working."
- With regard to the question, So this time that you met her at the Japanese Gardens, were you on duty then? , Ofc. Conrath replies, "Yes."
- "...the majority of the personal e-mail communications were also work related. I mean, the gist of all of our communication was work related and at some point it turned to personal related."
- With regard to the question, Did you meet in her car or your car?, Ofc. Conrath replied, "We weren't in a car. I parked my car and I was standing outside of it. She parked her car and stood outside of it...We talked, she got out of her car, she said, 'Can I hug you?' I said 'okay'. She gave me a hug, she explained that she was gonna go stay at a hotel..I don't recall the content of our conversation, but I would it was mostly appropriate."
- "There was a flirtatious nature to the way she spoke to me...you know we're kind of starting to go down that road, perhaps, where you know the smart thing to do would be break this off, wish her luck and leave and I didn't."
- With regard to the question, Was there more of a physical part to it than the hugging? Ofc. Conrath answered, "Yeah there was another hug before we left...There was two hugs and there was a kiss."
- With regard to the question, Did she ask you if you wanted her to wear her sexy clothes?, Ofc. Conrath answered that he did recall, but that he was confused about the question.
- With regard to the question, Did you tell her in any of these (phone conversations and e-mail messages), that she should leave her husband? Ofc. Conrath replied, "I'm sure I did, yeah. I'm sure I told her that multiple times." He clarified, "She claimed to be afraid of him. She told me that he abuses her and she believes he's involved in drug activity and she claimed he's a pretty bad guy. So, that's the advice I would give anybody in that situation."
- Where there any times that you met her while you were on duty? "No, none."
- With regard to the question, So you made arrangements to meet her at a hotel. What hotel what that? Ofc. Conrath answered, "it's in the valley, right of the Pines exit, right in front of you when you take the off ramp." (Mirabeau Hotel)
- What time do you think it was that you went to the hotel? "Three to four AM."
- Ofc. Conrath denies ever meeting her at a hotel while on duty or ever driving out to where she lives while on duty.
- With regard to the question, Did you have sexual relations with this woman? Ofc. Conrath replied, "We did not have sex, but there was sexual contact...there was mutual oral sex between us."
- Ofc. Conrath said he is no longer in contact with the woman.
- Did you become aware that her husband knew about this? Ofc. Conrath replied, "Not until yesterday (10-5-15) when I was notified through an e-mail from you."
- What stopped your contact with her then? Ofc. Conrath replied, "Well, mostly it was just a stupid thing for me to be engaging in and I knew that, but to complicate matters I have some personal issues at home that I'm dealing with, with my family...kind of a 'leave me alone' sort of an exchange and I haven't talked to her since then."
- "Yeah, I was sort of flirting with disaster. Yeah, I acknowledge that."
- "All I would add is that I freely recognize that this was my wrongdoing and I made a big mistake and I take responsibility for it. This kind of thing would never happen again to me."

Excerpts from YaQun's statements

Sgt. Staben from Internal Affairs has attempted to schedule and conduct an interview with YaQuin and has not been able to do so, including visiting her residence in person, leaving a business card, and making repeated phone calls. At this time complainant Brent Roundtree is the respondent in an order where she is the petitioner, so using his assistance to make contact with her is not an option. At one point she did schedule an interview but didn't show up, citing a dead car battery. She has left messages with Sgt. Staben but has a phone which isn't set up to receive voicemail.

Sgt. Staben forwarded an e-mail to the ARP pod members which he had received from the address sunyaqun@yahoo.com . The contents purport to be from YaQun, however the only item in the e-mail which directly references this investigation is, "I would ask you please there's nothing officer Chris Conard (sp) do wrong. He's a good officer." The remainder of the narrative concerns itself with domestic allegations against Brent Roundtree.

ANALYSIS

The initial response to the DVOPV call by Ofc. Conrath was appropriate, with an adequate investigation, a determination that no probable cause existed for an arrest, and the documentation of the information in a report. Ofc. Conrath gave complainant/victim YaQun a Crime Victim card with the incident number and a verbal recounting of resources including the amending of a current order to provide greater protection.

While officers have cell phones in their patrol cars to conduct or facilitate department related business, in this particular case Ofc. Conrath provided YaQun with the phone number for his car cell. This action wasn't improper in itself, but did provide an initial conduit between the parties outside of the time confines of the call. Ofc. Conrath had already obtained YaQun's cell phone number for purposes of submitting a complete report. By providing his own, it gave the victim a means to directly contact Ofc. Conrath at her own initiative. As well, YaQun at some point in the process or within a few hours following the call's conclusion obtained Ofc. Conrath's department e-mail address, and initiated an e-mail communication five hours after the call was closed, to which Ofc. Conrath immediately began replying.

The e-mail conversation quickly turned personal, and Ofc. Conrath wisely chose to reply with a response to a very personal compliment that he needed to keep his professional life separate from his personal life. Up until this time, there were no policy violations noted.

Unfortunately, Ofc. Conrath quickly allowed YaQun's personal communications to accelerate into a policy violation. Instead of severing communications, he continued making and receiving calls, and ultimately provided personal e-mail and cell phone number to facilitate continued communication while stepping away from the department phone and e-mail. It is determined that there were no violations from use of the department's phones or computer systems, although they were used as a jumping off point to pull a professional relationship into a personal and intimate relationship.

The moment at which the violation became substantive occurred the following night, approximately 26 hours after the initial DVOPV call had concluded. While still showing on an unrelated DV order service call, Ofc. Conrath called YaQun and spoke for 15 minutes on his department assigned cell phone, then cleared his call as a backup, and met on duty, in uniform and in his patrol car at a parking area north of the Japanese Gardens at approximately 0020 hours. Even so, no policy violation had yet occurred. Where the line was crossed was when YaQun asked if she could hug him, and he said yes. Following that initial hug came another hug, a kiss, and an agreement to meet at a hotel in the valley after he got off shift. It is reasonable to conclude that these actions went beyond "mere friendship" as the 'Nepotism and Conflicting Relationships' policy allows as a MAXIMUM boundary with regard to victims and witnesses of crimes.

Ofc. Conrath stated in his interview that, following his work shift, he drove to the Mirabeau Hotel sometime "between 3-4 am" and engaged in mutual oral sex with YaQun, a domestic violence victim he had met about 32 hours before.

The purpose behind a policy articulating a department prohibition between officers and victims is obvious. It is because a victim tends to be vulnerable and looking for anchor points, places to place trust and find safety. A police officer is seen as a figurative and sometimes literal 'savior', someone in a position of authority, having confidence and strength, and providing solutions and resources for someone having neither. The "knight in shining armor" presented to a crime victim looking for just such an illusion provides a susceptibility for an officer to take advantage of a victim's emotional weakness and purport to fill that gap and that role. Additionally, police officers, by virtue of their position and authority, have access to databases, tools and resources not available or known to a victim, which can be used to accentuate or perpetuate the "knight in shining armor" image for personal gain.

At this point, however, while having violated the 'Nepotism and Conflicting Relationships' and 'Conduct' policies regarding intimate relationships, there wasn't yet another policy violation until the relationship was discovered by YaQun's husband Brent Roundtree. Initially he was considered an accused DV suspect, but with no probable cause to arrest him. YaQun recounted an ongoing abusive relationship, which Ofc. Conrath addressed in the initial report call by counseling separation from him as an option, obtaining or amending a protection order, and other reasonable choices for YaQun to consider.

His continuing to counsel her during the hours following the call's conclusion through department and personal phones and e-mail addresses, then in person were ill-advised, but not by themselves wrongdoing. Counseling YaQun to leave her husband while moving down a path toward a sexual relationship was very inappropriate, and covered by the Conflicting Relationships policy.

When Brent Roundtree discovered the communications and the rendezvous, Ofc. Conrath then had "conducted himself in a manner to discredit the law enforcement profession and the Spokane Police Department."

CONCLUSION and FINDINGS

The initial allegations presented are:

I. Canons and Ethics Standard 4.9 Conduct Unbecoming

Members of the Spokane Police Department shall at all times conduct themselves in a manner which does not discredit the law enforcement profession or the Spokane Police Department."

II. Disciplinary Policy 340.3.2(I) Conduct The following is/are misconduct:

Solicitation of a personal or sexual relationship while on-duty or through the use of official capacity."

III. Canons and Ethics Standard 3.2 Inadequate Response

Members of the Spokane Police Department, during their tour of duty, shall diligently devote their time and attention to the effective and professional performance of their responsibilities."

DETERMINATION

I. CONDUCT UNBECOMING

The finding is **SUSTAINED**. The parallel policy to Canon 4.9, **340.3.5(ab) Performance** would be also be a correct cite: *"Conduct unbecoming: No member of the department shall conduct himself/herself in a disorderly manner at any time, either on or off duty, or conduct himself/herself in a manner unbecoming the conduct of a member of the City of Spokane Police Department.*

II. 340.3.2(I) Conduct,
the finding is **SUSTAINED**. There is, however, a parallel policy which would be a more specific fit for the conduct investigated, and which we recommend be substituted for the above cite. That policy is:

1050 Nepotism and Conflicting Relationships

1050.1.1 Definitions

1. **Conflict of interest** – any actual perceived or potential conflict of interest in which it reasonably appears that a department employee's action, inaction or decisions are or may be influenced by the employee's personal or business relationship.
2. **Personal relationship** – Includes marriage, cohabitation, dating or any other intimate relationship beyond mere friendship.
3. **Public official** – A supervisor, officer or employee who is vested with authority by law, rule or regulation, or to whom authority has been delegated.

1050.2(d) RESTRICTED DUTIES AND ASSIGNMENTS "To avoid actual or perceived conflicts of interest, members of this department shall refrain from developing or maintaining personal or financial relationships with victims, witnesses, or other individuals during the course of or as a direct result of any official contact."

III. Canons and Ethics 3.2 Inadequate Response

The finding is **NOT SUSTAINED**. Ofc. Conrath did respond to the call in a timely manner, completed a report documenting the allegations, determined whether or not there was probable cause to arrest or not, counseled the complainant on obtaining or amending a protection order, and left a Crime Victim card with the incident number. There is no indication that his handling of the call was not effective or professional. It was his decisions and behaviors following the conclusion of the call, however, which were inappropriate and in violation of department policy.

****END OF REVIEW****

Captain Dan Torok

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Lt. Rex Olson



Lt. Alan Arnzen



Lt. Mark Griffiths



Lt. Dean Sprague (author)



SPOKANE EXHIBIT 3



SPOKANE POLICE DIVISION
INTERIM CHIEF OF POLICE
PATRICK M. DOBROW

***Internal Affairs Investigation
Case Finding Notice***

To: Officer Christopher Conrath #1106

Date: 01/06/16

From: Chief Rick Dobrow # 403

IA Number: C15-085

An internal review has been concluded concerning certain allegations of misconduct. These allegations stem from an incident that occurred on:

Date: 09/07/15

Report Number: 15-314385 **Complainant:** Brent Roundtree **Location:** Spokane

Allegation #1: Canon 4.9/Policy 340.3.5 Conduct Unbecoming

Allegation #2: Policy 340.3.2(I) Conduct/ 1050.1.1 Nepotism and Conflicting Relationships

Allegation #3: Policy 3.2 Inadequate Response

Investigator: Sgt. Staben #592

Finding:	Allegation #1	Sustained
Finding:	Allegation #2	Sustained
Finding:	Allegation #3	Not Sustained

Sanction: Suspended 30 actual work days (10.67hr schedule) of which two days of accrued leave can be forfeited in lieu thereof.

Narrative: Sound decision making and judgment are critical for members of law enforcement. Both of these traits were called into question in this incident. Please take this as an opportunity to learn from your mistake and never repeat this behavior.

Chief Rick Dobrow #403

This case file will be maintained in the Internal Affairs files and available for your review. In the event of an "Improper Conduct" finding, a copy of any disciplinary report will become a part of your personnel file.

Public Safety Building • 1100 W. Mallon Avenue • Spokane, Washington 99260-0001



SPOKANE EXHIBIT 4

https://www.khq.com/news/spokane-police-officer-facing-30-day-suspension-after-investigation-reveals-relationship-with-citizens-wife/article_bdd0fb19-cf17-5097-8eaf-21e84226c96f.html

Spokane Police officer facing 30 day suspension after investigation reveals relationship with citizen's wife

Jan 13, 2016



A Spokane Police Officer is facing unpaid suspension for 30 days following the completion of an Internal Affairs investigation into allegations by a citizen that the officer had an inappropriate relationship with the citizen's wife following a domestic violence call.

On September 7th, Spokane Police responded to a call from a woman who said she had just been assaulted and kicked out of a car by her husband. According to the investigation, Officer Chris Conrath responded to the scene but didn't find probable cause to arrest the woman's husband.

5 hours later, the woman started emailing Officer Conrath's SPD email address, first thanking him for his work, and then emailing "I have to tell you, I can't stop thinking about you."

"I am flattered. I think that you are a very nice girl," Officer Conrath emailed back the following afternoon. "I am happy to help you in any way that I can, especially when it comes to keeping you and your family safe. I need to make it perfectly clear though, that any interaction outside my professional capacity would be inappropriate. I hope you understand," Conrath concluded.

However, the contact between the two continued.

While on duty over the next few hours, Conrath called the woman 4 times. On September 8th, the two met in a secluded parking lot near the Japanese Gardens on the South Hill.

According interviews from the Internal Affairs investigation, Conrath said he told the woman to leave her husband and she invited him to come see her at the Mirabeau Hotel where she was staying. Conrath admitted the meeting ended with a hug and kiss.

After getting off work, Conrath drove to a Spokane Valley motel between 3:00a.m and 4:00 a.m. and met once again with the woman who was staying there. Conrath told investigators there was sexual contact between the two of them, but not sexual intercourse.

A week later the husband of the woman found messages between his wife and Officer Conrath on her phone. The husband filed a complaint about the affair with the police department.

On October 6, 2015, Officer Conrath was interviewed by investigators and admitted to the affair saying "Yeah, I was sort of flirting with disaster... I made a big mistake and I take responsibility for it."

Conrath told investigators he is no longer seeing the woman.

10/28/2020

Spokane Police officer facing 30 day suspension after investigation reveals relationship with citizen's wife | News | khq.com

A month later, an administrative review panel began looking at the complaint and last week that panel found that Officer Conrath violated department policy in two of the three initial allegations, including Conduct Unbecoming of an Officer. The panel recommended last week Officer Conrath be suspended for 30 days as a result.

SPOKANE EXHIBIT 5

TAPE TRANSCRIPTION

IA CASE #: C15-085

DATE: 10/06/2015 TIME: 16:05

COMPLAINANT: Brent Roundtree

COMPLAINT: Conduct Unbecoming

DS: Dave Staben

CC: Christopher Conrath

JG: John Gately

SG: John Griffin

DS: Okay, we're now beginning the interview. The time is 16:05 and the date is October 6th, 2015. Present in the room are myself, Sergeant Staben, Officer Christopher Conrath and John Gately and John Griffin, both Sergeants and representing the Spokane Police Guild. This interview is being recorded. Internal Investigations files are considered public record and are subject to release in accordance with Washington State Law. Officer Conrath, do you have any concerns with the release of this investigation?

CC: Well I...I'd say I have some concerns. I...I would prefer that it not be released. I'm not...I don't know what options I have in that regard, but it's...it's obviously defamatory towards me and potentially the department. I'd rather not have my personal information given to maybe this individual who's making the complaint, but aside from that.

DS: Okay. Would you please confirm the spelling of your last name and tell me your personnel number?

CC: C-O-N-R-A-T-H; badge number 1-1-0-6.

DS: Have you read and signed your Administrative Rights and Responsibilities Form?

CC: I have.

DS: Have you been offered a copy of those rights?

CC: Yes I have.

DS: Do you understand them?

CC: Yes.

DS: Have you been given a written overview of the allegations in this case?

CC: I've been given a summary of the allegations.

DS: Okay. Do you understand that you are an accused officer in this investigation?

CC: Yes.

TAPE TRANSCRIPTION

IA CASE #: C15-085

DATE: 10/06/2015 TIME: 16:05

COMPLAINANT: Brent Roundtree

COMPLAINT: Conduct Unbecoming

DS: The IA tracking number Charlie 15-085. The allegation is that Officer Conrath has had inappropriate contact with a person who reported Domestic Violence after that call was completed. Officer Conrath, how long have you worked for the Spokane Police Department?

CC: I was hired fulltime in July of 2010. Prior to that I was a Reserve Officer for roughly two years.

DS: Do you have any prior law enforcement experience?

CC: No.

DS: Do you have any specialty assignments?

CC: I'm a member of our TAC Team and I...I'm an Instructor for Firearms.

DS: What is your current assignment?

CC: Powershift Patrol, Team 9.

DS: So, what was your assignment on September 7th and the week after that?

CC: The same.

DS: Okay, do you recall taking this...this call here?

CC: I do.

DS: Tell me what you remember about that.

CC: I...I have not reviewed my report, but I remember...

DS: I have it here if you would like to look at it.

CC: Okay. I might like to glance at it, but...

DS: I'm not in a hurry, so...

CC: Okay.

DS: Do whatever you need to do there.

CC: Okay, it came out as a...I want to say it came out as a...either a DV or a...a DVOPV. The...the gist of it was this female and her husband were involved in a domestic altercation while in a vehicle somewhere on the south hill. As they got towards the...near...near [unintelligible] 3rd and Maple...he'd...while in the car he'd spit on her and maybe smacked her or something, but kicked her out of the car. So, she was at 3rd and Maple at the gas station and called us. That's right,

TAPE TRANSCRIPTION

IA CASE #: C15-085

DATE: 10/06/2015 TIME: 16:05

COMPLAINANT: Brent Roundtree

COMPLAINT: Conduct Unbecoming

she did not report the order violation, but records err radio advised that there was a...an order of some sort which she claims had been...has gone away. So, upon reviewing the order, the order really didn't protect her from contact. It protected her from his ability to commit crimes against her. So really it had no effect or [unintelligible] the situation I guess, unless there's PC for an assault, it would have been a felony assault or felony order violation. So, I...I took her simple assault report. There was no PC, there was no injuries, no marks, pretty straight forward.

DS: Okay. When did you finish that report?

CC: I finished the report...I don't know, where's the time that it...?

DS: Should be on the front there?

CC: [Unintelligible] seven...maybe the following day? Let's see. [Unintelligible], two am.

DS: So right before you got off duty?

CC: Right before the end of shift.

DS: Okay. So after taking that report, did you have any other contact with that...that women?

CC: I did.

DS: Tell me about that.

CC: She...there was an email correspondence...I don't recall the exact verbiage, but she...she emailed me on my work email to...something to the effect of a "thank you for your help". I replied to that with a "you're welcome". She replied again, with...I don't remember what it says exactly, but something to the effect of "I can't stop thinking about you", which struck me as odd. So, I replied to that with...I don't know...maybe it would be easier to just reference the exact emails, but...which I would have no problem with. The...the email that I responded to said...I said "I'm flattered, you know you're a very nice girl, but to interact with you outside of work would be inappropriate and I hope you understand". I'm paraphrasing. Let's see, that might possible be the end of our email exchange. I...I did speak with her again, two or three times perhaps on...on the work cell phone that's assigned to my patrol vehicle. She had that number. I spoke with her several times, work related material. She had questions about you know trying to separate from her husband, no contact orders. I advised her to...to have her order amended to prohibit contact, because she claimed to be afraid of this guy. She claimed that he was abusive and on and on. So, all of the answers that I would normally give someone in that situation are the ones that I was giving her. So at that point, completely work related stuff. Aside from that oddity, you know with that email exchange, which I'd felt that I sort of addressed at that point appropriately. At some point she...I...I spoke to her on the phone and she asked...she said she was in town and asked if I...if I could meet her somewhere and so I said "okay". This was probably...I want to say after one am, between one and two, right before the end of my shift and so I...I said "yes, I can meet you". We ended up meeting at the...the entryway to Japanese

TAPE TRANSCRIPTION

IA CASE #: C15-085

DATE: 10/06/2015 TIME: 16:05

COMPLAINANT: Brent Roundtree

COMPLAINT: Conduct Unbecoming

Gardens. There's a little turnout off of...I want to say Bernard, so I met her there. Again, we talked about...she had...she had kind of gotten to the point where she was packing up and gonna leave this guy. You know again, I'm talking about "Well do you need a shelter?" You know, "What can I help you with here?" Well she was going to stay in a hotel. So, at some point...I don't recall if it was during that contact or during a subsequent phone contact, she invited me to meet her at the hotel, which I did after my shift was over.

DS: Okay, so let's back...let's back up a little bit. So you said she emailed you first. Did she initiate contact with you or did you initiate contact with her?

CC: She initiated contact with me.

DS: And this was on your work email?

CC: Correct.

DS: And in that first contact or the first series of contact, is that when she said that she couldn't stop thinking about you?

CC: I...I believe so, yes.

DS: Okay.

CC: [Unintelligible] in the initial email. The...the...maybe the second email she sent to me.

DS: Do you remember what day that was?

CC: I don't, but I'm sure the email is on record.

DS: Okay and in those emails you said that would be inappropriate?

CC: I did, I sent an initial reply to that effect.

DS: Okay. Now the phone calls, you said that you talked to her on your work phone?

CC: Yes.

DS: Was that...is that the same day or other days?

CC: I...I want to say it's other day, not that day.

DS: Okay, who initiated...

CC: [Unintelligible] there was several phone calls.

TAPE TRANSCRIPTION

IA CASE #: C15-085

DATE: 10/06/2015 TIME: 16:05

COMPLAINANT: Brent Roundtree

COMPLAINT: Conduct Unbecoming

DS: Who initiated those calls?

CC: Probably...there was...okay, let me...let me back up and try to clarify. After maybe, early on...there was multiple phone calls in both directions and at some point I provided her with my personal email address. So we had some correspondence there, because I didn't want to cloud up my work email with this kind of thing. However, a lot of our...my personal correspondence with her...well, excuse me, correspondence through my personal email address was...I would say still work related material. Where she's...well this...this particular female, I want to say she's Chinese, there's a little bit of a language barrier. Explaining these things to her is...is difficult to describe in a way that she can understand. So, multiple questions about "What should I do? How do I go to the courthouse and how do I do all the things that I need to do to get away from this...from this fellow?" So, multiple emails back and forth between the two of us. So, I think I'm digressing somewhat. So she did have my personal email address, which how...how many emails went back and forth, I...I [unintelligible] it would be difficult to guess, but they were brief. Almost like...using it as like a text messaging sort of thing, where she'd ask...you know or she'd tell me something like "he's...he's being mean to me or he took my this or he took my car keys, I can't leave", and so I would say...you know I would say "well call 9-1-1", you know get...get...she lives in the county somewhere to the west. So, I'd simply advise her to...to call police in that area and deal with it or leave him or you know...multiple times, repetitive in nature. So, I'm...I'm sorry, what was the original question?

DS: Well the original question was the phone calls that you had between her, if she instigated those calls...

CC: Okay.

DS: Or you did?

CC: Okay, so I would say they were both ways. She had the...the car number and she might send me an email saying "can you call me?" And so I would call her. So, there...there are probably several outgoing and several incoming calls from that work phone that were made while I was working.

DS: So the emails...your personal email address, you were using the work...your car computer for those?

CC: No, no. Those appear on my personal phone.

DS: Oh okay, so you have a smartphone that you were using?

CC: Uh hmm.

DS: Okay.

CC: And the reason I did that was because I...I don't want to check my work email...I mean, she was sending me, you know, "What should I do?" So I'd send her a reply and then she would...and so

TAPE TRANSCRIPTION

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COMPLAINANT: Brent Roundtree

COMPLAINT: Conduct Unbecoming

there was an exchange that was easier to facilitate on my phone. In hindsight, that was poor judgement.

DS: Now you said that you...she was calling you on the work phone?

CC: Yes.

DS: Was she calling you on your personal phone?

CC: No.

DS: Is that...

CC: I...I may have called her from my personal phone, but she never at any point had my phone...my personal phone number.

DS: Okay. Just for clarification did you call her from your work phone?

CC: I want to say, yes.

DS: Okay.

CC: Well, I'm sure I did, yes.

DS: So this time that you met her at the Japanese Gardens, were you on duty then?

CC: Yes.

DS: Okay. Did you make that meeting with your work phone or was it through the email?

CC: I don't recall, probably both, a combination of the both.

DS: So it sounds like what...from what you're telling me is that the conversations that you had on the work email address were...tended to be more about...were more professional, more about the situation and then the personal stuff was more on your personal smartphone. Is that...?

CC: Yes and I would only add that the majority of the personal email communications were also work related. I mean, the jest of all of our communication was work related and at some point it turned to personal related, if that makes sense.

DS: Uh hmm. So, when you met her up at the Japanese Gardens, what did you think was gonna happen there? What as the reason for that meeting?

CC: She had packed up her car and had left the house and she simply asked if she could meet me.

TAPE TRANSCRIPTION

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COMPLAINANT: Brent Roundtree

COMPLAINT: Conduct Unbecoming

DS: Now, she already told you that she couldn't stop thinking about you?

CC: Uh hmm. Correct.

DS: And...

CC: We've had a lot of [unintelligible] interaction through email and...and conversationally between that time and now. There was certainly more to it than purely work related, however I still wanted to help this women get away from what I believed was an unsafe situation at home, so.

DS: So where specifically did you park at the Japanese Gardens?

CC: There's...there's a turn out, [unintelligible] well, how do I describe it? A small parking area inside Japanese Gardens. Not inside Japanese Gardens, outside the walls of Japanese Gardens, there's a parking are just east of Bernard.

DS: So you drive down the side street past the Japanese Gardens and there one...it's right heading to the rose garden. Is that the one?

CC: No, it's as you...is it Bernard?

DS: Uh hmm.

CC: And then there's...Japanese Gardens is fenced in and locked off at night and then there's a...right...as you're going south before you...it's [unintelligible]...the parking area is north of the Japanese Gardens.

DS: Okay. I gotcha.

CC: And then that turn, that road goes all the way through the park, but there's a little...I don't know, there's three parking spots right there.

DS: Did you meet in her car or your car?

CC: We weren't in a car. I parked my car and I was standing outside of it. She parked her car and stood outside of it.

DS: Okay. So what occurred at that meeting?

CC: We talked, she got out of her car, she...she said "Can I hug you?" I said "okay". She gave me a hug, she explained that she was gonna go stay at a hotel and she was gonna do this...I encouraged that. I...I don't recall the...you know all the content of our conversation, but it was..I would say mostly appropriate.

DS: What part of it wasn't appropriate?

TAPE TRANSCRIPTION

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- CC: It's difficult to...for me to recall with specificity. This...there was a...I guess maybe a flirtatious nature to the way she spoke to me and...I wouldn't call it inappropriate, but it was bordering on...on that. You know we're kind of starting to go down that road, perhaps, where you know the smart thing to do would be break this off, wish her a...wish her luck and...and leave and I didn't.
- DS: Was there more of physical part to it than the hugging?
- CC: Yeah, there was a...well, there was another hug before...before we left.
- DS: So...
- CC: [Unintelligible].
- DS: So you're saying there was just two hugs?
- CC: There was two hugs and there was kiss.
- DS: Anything else.
- CC: No. That's all of it.
- DS: When you arranged or you...she or together arranged this meeting, did she ask you...did she ask you if you wanted her to wear her sexy clothes? Do you remember that?
- CC: Yes. I...at the time it didn't make sense. I wasn't sure what she was trying to say or she said something. It...it was a "should I change my sexy clothes or...?" It didn't...it wasn't like a complete sentence, the way I remember that. That...
- DS: What did you respond to that?
- CC: I don't...I don't recall.
- DS: So was that this meeting at the Japanese Gardens where you made arrangements to meet her after your shift?
- CC: It was either there or a [unintelligible] subsequent phone conversation or maybe an email. I don't...I don't...it would have been...may have been, may have been while we were still there.
- DS: Did you tell her in any of these messages that she should leave her husband?
- CC: I'm sure I did, yeah. I'm sure I told her that multiple times.
- DS: Okay. What was your reason for that?

TAPE TRANSCRIPTION

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COMPLAINT: Conduct Unbecoming

CC: She claimed to be afraid of him. She told me that he abuses her and she believes he's involved in drug activity and she claimed is a pretty bad guy. So, that's the advice I would give anybody in that situation.

DS: Did you tell her how to go about getting an order?

CC: In basic terms, yes. I...I said...I mean I as...as much as I know. I sent her to the courthouse and I'd go there and start asking questions about how to...I think I advised her specially to amend the order that she has now. I don't have a great deal of knowledge on how...of the specifics of that anyway. That's...that's basically my canned answer to that.

DS: Did you give her a Crime Victim Card when you first took this report?

CC: I did.

DS: What do you know about our Domestic Violence Unit?

CC: Very little. I know that...some of the guys that are on it, but...

DS: Did you refer her to our Domestic Violence Unit?

CC: No.

DS: Did you refer her to a DV Advocate?

CC: Well I gave her our Crime Victim Card, explained that there was resources and phone numbers and that's my understanding of the...the requirement. So, no I didn't...I didn't contact the DV Unit directly.

DS: What are your personal vehicles? Make and model?

CC: I drive a...well, I recently acquired a new pickup. So I...I had a silver Chevy Silverado. I'm not sure when I changed vehicles and now I drive a black and green F150.

DS: Any other household vehicles there?

CC: My wife drives a Honda Pilot. I have a motorcycle that I haven't ridden in months.

DS: Were there any other times that you met her while you were on duty?

CC: No, none.

DS: So you made arrangements to meet her at a hotel. What hotel was that?

TAPE TRANSCRIPTION

IA CASE #: C15-085

DATE: 10/06/2015 TIME: 16:05

COMPLAINANT: Brent Roundtree

COMPLAINT: Conduct Unbecoming

CC: It's in the valley, I don't know the name of it. Right off the Pines exit, it's right there, right in front of you when you take the off ramp. I don't know the name of it.

DS: So you...

CC: I'm sorry, I don't recall the name.

DS: So you go north off of Pines or...or south?

CC: When you take...when you take the Pines exit eastbound, it's...the hotel that is right there when you hit the...when you stop at the first light...like there's a hotel right there in front of your face and I don't recall the name of it.

DS: What time do you think it was that you went to the hotel?

CC: Three to four am.

DS: Is it possible that you went there on duty?

CC: No.

DS: Did you ever meet her at a hotel while on duty?

CC: No.

DS: Did you ever drive out to where she lives while on duty?

CC: No or otherwise.

DS: So at this meeting at the Japanese Gardens you made arrangements to go to this hotel?

CC: Yes.

DS: Off of Pines?

CC: Yes.

DS: Did you have sexual relations with this women?

CC: We did not have sex, but there was sexual contact.

DS: When you say sexual contact, are you...does that meet the legal definition of sexual contact?

CC: There was mutual oral sex between us.

TAPE TRANSCRIPTION

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COMPLAINT: Conduct Unbecoming

DS: Okay. Are you still in contact with this women?

CC: No.

DS: What sort of contact did you have with her after this day?

CC: Minimal, if any. I don't know that I have been in contact with her since then. Other than a "how are you" email or something to that effect?

DS: Did you become aware that her husband knew about this?

CC: Not until yesterday when I was notified through an email from you.

DS: What stopped your contact with her then?

CC: Well, mostly it was just a stupid thing for me to be engaging in and I knew that, but to complicate matters I have some personal issues at home that I'm dealing with, with my family and...as a matter of fact I think I ended up relying to one of her emails with "hey look, I have some personal stuff going on, my wife is sick and I...I'm going to be taking some time off work". You know, and I...I...and kind of like a "leave me alone" sort of...sort of an exchange and I haven't talked to her since then.

DS: So we started out this interview, you started by saying this contact with her was professional in the beginning?

CC: Yes.

DS: And at some point it moved beyond that?

CC: Yes.

DS: And I...I guess I want you to be clear about this, when...when you first told me about the meeting at the Japanese Gardens you were mixing this is professional and it's clearly not. She told you, "do you want me to wear my sexy clothes and whether you fully understood that or not, she already told you she was interested in you. You've already been having multiple conversations and emails?

CC: Yeah, I was sort of flirting with disaster. Yeah, I...I...I acknowledge that.

DS: Alright. I don't have anything else.

CC: Okay.

JG: We'll take a little break.

TAPE TRANSCRIPTION

IA CASE #: C15-085

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COMPLAINT: Conduct Unbecoming

DS: Okay, we're now going off record here and the time is 16:34.

[End of 1st Recording]

DS: Alright we're now going back on the record, its 16:40 and it is October 6th, 2015 and still on IA Charlie 15-085 with Officer Chris Conrath.

JG: I have no questions.

SG: I don't have any questions.

DS: Would you like to say anything else?

CC: All I would add is that I freely recognize that this was my wrongdoing and I made a big mistake and I take responsibility for it. This kind of thing would never happen again to me.

DS: Anything else?

CC: That's all I have, sir.

DS: Okay. We're now concluding this interview, the time is 16:41.

[End of Recording]

SPOKANE EXHIBIT 6



Spokane Police Department Internal Affairs



IA Additional

IA Number: C20-074
Incident Number: 2015-00175293
Date: 11/17/2020
Investigator: Sergeant A. Dollard #937

Synopsis:

The complainant, [REDACTED] 2i [REDACTED] alleged that then-Officer Chris Conrath struck up an inappropriate intimate relationship with his then-wife following a DV call for service on 05/27/2015. He alleged his estranged wife, [REDACTED] 2i [REDACTED] chronicled that relationship from June 2015 to January 2016 which comprised of a ride-a-long with Ofc. Conrath, shooting at the department's academy range, visits from him while he was on duty as well as off-duty and staying the night at her residence.

Complaint Being Investigated (2015 policies)

SPD policy 1050.2d Members of this department shall refrain from developing or maintaining personal relationships with victims, witnesses or other individuals during the course of or as a direct result of any official contact.

SPD Standard 4.9 Members of the Spokane Police Department shall at all times conduct themselves in a manner which does not discredit the law enforcement profession or the Spokane Police Department

SPD Policy 340.3.2m Engaging in on duty sexual relations

SPD Policy 340.3.5p Failure to disclose material facts or the making of false or misleading statement on any application, examination form or other official document, report form, or during the course of any work related investigation.

Interview Summaries

[REDACTED] 2i [REDACTED]

On 10/07/2020 I contacted the complainant, [REDACTED] 2i [REDACTED] by phone which he consented to being recorded. I was not able to interview him at that time and scheduled an interview with him at a later date. At that time I asked him if he would send me any evidence he had including a supposed

calendar that chronicled the relationship his wife had with then-Officer Chris Conrath. [REDACTED] 2i emailed pictures he took of the calendar which have been attached to this case.

On 10/14/2020, I spoke to [REDACTED] 2i via telephone. At the time he was working in Alaska so an in person interview was not possible. [REDACTED] 2i consented to the interview being recorded and I read him the statement admonishing him of the consequences of making false or misleading statements. Spokane Police Ombudsman Bart Logue could not attend the meeting at the time but was briefed afterward.

[REDACTED] 2i explained that he and [REDACTED] 2i had been married in 2010 and divorced in June of 2015 due to her substance abuse. Months before the divorce, they were separated and living apart. Recently in August of 2020 they began reconciling and [REDACTED] 2i moved back in with [REDACTED] 2i. During the move, he said he came across some calendars in a box of belongings. When he looked at them he noticed the 2015 calendar year had numerous entries referencing a person named "Chris" that were around the same time of their separation and divorce. [REDACTED] 2i statement in regards to this was, *"During the course of getting her belongings ready to come over, I came across some materials which were calendars with dates and times and what I viewed in there was that a police officer had come to the house, because she had made a call that the sprinkler lines were damaged. I believe that she thought that I had purposely damaged them which was of course not true and then what I saw in the calendar was that after the incident (it) then led into a relationship for some time between [REDACTED] 2i and the police officer. It was just concerning to me."*

[REDACTED] 2i also said, *"I knew that it was not appropriate for a police officer to respond to a call and to then use that opportunity to be involved in a relationship with whoever would be at the call and then I guess I got a little bit more concerned when I found out the identity of the officer and had found out that there was maybe a pattern of this behavior and it was upon finding out that the officer was Chris Conrath and at the same time had been involved in another situation such as this and I thought that there potentially might be some type of predatory or other concerning behaviors with a police officer. I just thought it was worthwhile to utilize this avenue to bring it to the attention of the police."* I asked [REDACTED] 2i how he knew the person [REDACTED] 2i was referring to was Chris Conrath and he said, *"So I would've never known that, except [REDACTED] 2i told me that it was Chris Conrath."* [REDACTED] 2i added that Conrath's name sounded familiar and a google search resulted in the news coverage of a similar situation involving then-Ofc. Conrath and a relationship he had with a DV victim (see IA case C15-085).

In the email [REDACTED] 2i had sent me on 10/08/20, he mentioned he contacted [REDACTED] 15 Chris' wife. He said, *"I just contacted her and said, 'Hey I think our spouses had a relationship. If you want to discuss it here is my contact information'."* [REDACTED] 15 *contacted me and asked me the details. I provided her as much detail as I could. My motivation in that was just so she can have an honest assessment of what's going on in her own life."*

[REDACTED] 2i indicated he did not ask [REDACTED] 2i any further probing questions about the relationship because of the fragile state of their renewed relationship and her troubled past. [REDACTED] 2i described [REDACTED] 2i as recovering from alcoholism and mental health issues. In the last year of their marriage, [REDACTED] 2i said he knew of at least one occasion when she tried to kill herself with a handgun, but just ended up discharging it multiple times into the walls of their house. He said she had also been arrested for a DUI early in 2015. I asked [REDACTED] 2i if it was typical for her to keep record of things on a calendar and he expressed that she was very particular about retaining records in all aspects of her life and likened it to almost being like a "hoarder". [REDACTED] 2i asked that I not reach out to contact [REDACTED] 2i because he insisted she was already very upset about this

time in her life being dragged up by him and in her mental state he was afraid she would relapse and begin drinking again. [2i] said after this call they wanted to be done with this matter and did not want to know the outcome of my investigation.

The next contact I had with [2i] was on 10/23/20 when he called me on my cell phone. This was the day after I personally contacted [2i] and interviewed her. [2i] expressed he was not pleased that I disregarded his wishes and contacted [2i] which had caused issues in their relationship. He asked me that if any further questions be asked of [2i] that I give him a call as well.

On 11/04/2020 I contacted [2i] via telephone to clarify some questions that came up in the interview with Corporal Conrath. In the recorded call I asked him if he made any of the written entries in the calendar he claimed was [2i]. He said he did not. I then asked him if he knew of any entries she had made in the calendar since he found them and [2i] said he could not answer that. He said [2i] verbally told him that her relationship with Corporal Conrath ended when Conrath told her about the internal investigation he was involved in and asked if she was going to join the case (C15-085) and that was the end. He was not sure of the date though. In my conversation with [2i] he repeatedly expressed that [2i] was very upset at having to bring up this experience in her life and he was regretting ever bringing this information forward to us. Despite this, I told him I needed to speak with her to try to confirm a few details. He reluctantly set up a time for me to meet with her.

[2q]

On 10/15/2020 I was attempted speak to [2q]. She was the female involved in a work-related sexual relationship with Ofc. C. Conrath back in September and October of 2015. A reference to her was found in a text message that [2i] had sent [2i] in September of 2020. In that message, [2i] wrote, *"I wrote Asian girl where I did after talking to him to get a look at what that meant for my timeline"*. [2q] is of Asian descent. Despite reaching her via phone, she would not talk about this topic and did not want to talk with me any further.

The above reference to "Asian girl" was later determined in my interview with [2i] to mean she had written that in the calendar to establish a time frame when she believed Corporal Conrath had been in relationship with [2q].

[2i]

On 10/22/2020 Director J. MacConnell and I went to [2i] to speak to [2i]. She answered her door and agreed to speak with us. In an effort to be sensitive to [2i] wish that I not bring him further into this investigation, I made the decision to tell her I had received information from an anonymous source of the possibility of a relationship between her and an SPD officer. Immediately she said she knew the source was [2i] and that he was probably jealous when he learned she had a relationship with a Spokane Police Officer while they were separated. Also during this interview, we did not show her the copies of the calendar provided to us by [2i] or divulge to her that we had them. From the outset of this investigation it seemed he also did not want her knowing he had taken her personal information and shared it with us.

2i agreed to have the interview recorded but did not want us to come into her residence. I advised 2i of the consequences of making false or misleading statements and she said she understood.

I asked 2i if she was familiar with the name "Chris Conrath". She replied, *"Okay. I met him when I made a call, not to 911, but the other number because my sprinkler system wasn't working and my ex and I were not living together. I was here back then and the sprinkler system looked like the wires had been cut. I thought to me that seemed like something he would do. So, I said I think my wires may have been cut by my soon to be ex and they sent an officer over and it was him. He just came in and he looked at my sprinkler. I have no idea what day of the week that call happened. Then he said, 'Maybe I can come back this weekend when I'm not on duty and see if I can fix it.' So, I said okay. I just thought that was really, you know, nice. And so, he did come back that weekend, I believe, and looked at it. I don't think anything was wrong with it. So he came back Saturday, but don't quote me on that date. (He) came over, looked at it. I don't think anything happened then. I think we might've hugged and that was it."*

I asked her if he came in uniform or street clothes and she said he appeared to be off duty.

2i further stated she wasn't sure if they exchanged phone numbers on this occasion. Following that, she said Ofc. Conrath invited her to go on a "ride-along" which she confirmed was on or about June 26th. I asked her if he ever stayed the night and she said he did soon after they first met and while she still lived at the 2i residence. I also asked her if he ever came by while he was in uniform and she described one occasion after she had moved out of the 2i residence to the Ashton Apartment complex (3650 E. 51st AV 2i in June. I asked her what transpired when he arrived and she said, *"Some kind of sex stuff."* 2i elaborated and said, *"Yes, I went down on him."* In this questioning, 2i described that Ofc. Conrath was wearing his uniform and was there for approximately thirty to forty minutes and confirmed that what she was talking about was "oral sex". I asked her if this was the only time they had intimate contact and she said, *"No, the first time was here, when he stayed the night here. That was soon after he came over to fix the sprinkler. Because I assume we'd been together first and then I went on the ride along, after I'd already slept with him."* 2i also confirmed she was talking about sexual intercourse. I asked her how many times she had sexual relations with Ofc. Conrath and she said, *"One...two...maybe four...or three. I can't remember. My calendar would be better, but I don't think I marked sex on there. I just mark if it said 'Chris over,' then that probably means it. That's why I mark my calendar."*

She also said they shared personal information about their spouses and the problems in their marriages. During the interview, Director MacConnell asked 2i if Ofc. Conrath ever took her to a gun range and she confirmed he did on one occasion. 2i mentioned at one point she had recorded these events on a calendar and that it was probably inside the house.

I asked 2i if Ofc. Conrath mentioned anything about an internal investigation he was involved in regarding another woman. She said, *"He told me all about that because he was very concerned that I would say something, too. So, of course when all of that was going down, he reached out to me and said what was happening with this girl, somewhere I think on Manito or down on first and Maple. Some situation he was in and then he hooked up with this girl. And so, he was like, are you going to say anything? And I was like, no, I mean you're already getting in trouble."* I asked 2i if Ofc. Conrath indicated what would happen if she said anything. She stated, *"He knew it was going down and he was going to be in trouble like how nervous he was talking to me on the phone. He'd had a breakdown and he totally messed up. He was very remorseful of course because of what's going on and he was really scared and wanted to make sure I was going to keep my mouth*

shut. He didn't threaten me or anything." I asked her if Ofc. Conrath kept her informed on how that investigation was playing out and she said, *"No. He just talked to me to make sure I wouldn't say anything and then that was that. Then I saw some stuff on the news and stuff like that."*

I asked [2i] how long her relationship with him carried on for. She characterized it more as two consenting adults hooking up and that it just "fizzled out" because they're weren't talking all the time or texting. She added that when he called her to say he was going to get in trouble it just ended. Director MacConnell clarified with [2i] if she had any other personal contact with Ofc. Conrath after he told her about the other relationship he'd had. [2i] said, *"I think we may have once, at that apartment. I know he came over there to talk to me about the situation that he was in. He came over there to talk to me that he was going to get into trouble and I think we did have sex that day and that was the last time. And then he called me after he came over, he did make a phone call to me 'cause I remember I was at my mom's. I can't remember, but that's again the same phone call, he just wanted tell me you know, this is going on, make sure are you going to stay quiet."* Towards the end of our interview [2i] went back into her house to look for her calendar because she said she wanted to confirm specific dates to what she was talking to. She came back out a few minutes later and said she couldn't find it. I asked [2i] since this all happened if she thought the actions by then-Officer Conrath were inappropriate. Her reply was, *"I think it's inappropriate. I mean especially when I was grossed out to find out that some other person that he meets on a call down on Maple and second. That made me feel so gross. Just like ugh, I'm just like a used whatever. He's just going around picking up whoever he wants to and you know, being nice guy and then having sex."*

[2i] did not believe Ofc. Conrath used his influence of being a police officer to take advantage of her. She reiterated that they were both consenting adults.

I conducted a follow-up interview with [2i] on 11/12/2020. Director J. MacConnell and I went to her residence at [2i] I admonished her of the consequences of making any false statements and she said she understood. She also consented to our investigation being recorded however she did not want her name released to the public. I advised her I would be asking her questions based on photo copies of a calendar she may have authored and referred to in our last interview. [2i] was very upset that her ex-husband, [2i] had taken photos of her personal calendar and given them to us. It was her belief that he had done this to get back at Ofc. Conrath for the relationship he had with her. In my questioning I wanted to ascertain for certain that the photos of the calendar were in fact representations of hers and the entries on the dates were also made by her. She confirmed they both were hers. I specifically pointed out an entry she had made on 01/07/2016 wherein she wrote "Chris sent home early 1mo off = 2mo off". [2i] said, *"At some point he would have told me he got in trouble with the other girl. He told me what was going on. It was his last day."* [2i] however could not say for sure if it was that day he told her he was going to suffer those consequences. As [2i] looked at the calendar she pointed to an entry on 01/11/2016 and said, "Oh yeah he came over then. To tell me what was going on and to make sure I wasn't going to say anything." I asked her if that was the last time he came over and she said yes unless she wrote it down elsewhere. I asked [2i] if there was a definitive conclusion to their relationship in October of 2015. She seemed unsure and could not recall a specific moment that their relationship ended and indicated it just "fizzled out". Director MacConnell asked [2i] if she could say for certain if she still had contact with Ofc. Conrath during the months of December and January. She said if she saw him she would've written it down. She said they didn't talk much on the phone and only texted one another. At the end of the recorded interview, [2i] became upset and insisted [2i] was a controlling,

jealous person who was just trying to bring up the past to get back at Ofc. Conrath. [REDACTED] 2i later that night texted my work cell phone with the following message:

"Hi Officer Dollard. This is [REDACTED] 2i I'm sorry to bother you. I know this has nothing to do with your investigation, but [REDACTED] 2i sent me this text, which I will paste below, thanking me for helping him "exact" his "revenge". And he's hoping to get Conrath's work records made public so he can try to invalidate something on my calendar to catch me on something. This was his intent and finally admits it. He is manipulative. And yes, with that comes charisma. He put me through this for his own revenge on something that had nothing to do with him. And instead of I'm so sorry to put you through this, etc. I get this text: Thank you for helping me exact revenge. I love you.

I am sorry to text you. It has zero to do with your job. It is however, my life. A very personal life, that you needed to know now, and that in turn affects me and my life now. I'm living with someone who would choose to put the person they say they love through a very scary and embarrassing situation in order to obtain revenge on a person, who just happened to be a police officer, who has nothing to do with them.

I apologize for bothering you. Thank you for your time."

Corporal Chris Conrath

On 10/29/2020 I interviewed Corporal Chris Conrath. Present for the recorded interview were Lt. M. Cowles and Director J. MacConnell from Internal Affairs, Spokane Police Guild President Kris Honaker and Guild Vice President Dave Dunkin. OPO Bart Logue was also participating via conference call. During the initial instructions Corporal Conrath said he had concerns with this investigation being open to the public as it sought to obtain private, personal information about him that if released would have a detrimental effect on his personal life at home with his wife and children.

I provided the CAD record of the initial call he responded to on 05/27/15 and he said he recalled it. I also showed him a SPRS photo of [REDACTED] 2i and he also acknowledged he knew her but not prior to this call. From that call he stated, *"She speculated that she had just been involved in an ugly divorce, so she listed off "My ex-husband could've been involved, it could've been a neighbor kid. Although I get along pretty well with the neighbors, I have no idea who would've done this to me, but my ex-husband is pretty mad at me right now." That conversation took a matter of moments as we arrived at the problem area, the sprinkler box that's in the ground. It was obvious that no one had damaged it, so that belief was dispelled pretty quickly."*

At that time, Corporal Conrath said he offered to help her because it just looked like her sprinkler system was broke, Corporal Conrath could not remember how he arranged to contact her but said he returned days later, off duty. He then added, *"I went there for the purpose of helping this citizen repair her sprinkler system as something that I do on a regular basis for my friends and neighbors. I got down in the dirt and helped her fix the sprinkler system and so, I spent some time there. During that time, we developed a bit of a friendship, which continued on for a period of time. In the coming weeks and months, it had developed into a more private, intimate relationship."*

I asked Corporal Conrath if he did this for other victims, witnesses or suspects that he met while in the course of his duty. He said he did not and indicated this was a one-time thing.

I showed Corporal Conrath the copies of the calendars provided by [REDACTED] 2i I walked him thru many of the entries that appeared to be references to him and asked him if they appeared to be accurate. Corporal Conrath said because it was over five years ago he could not

be sure every entry was accurate but events like the ride-along and shooting at the SPD gun range he recalled doing with her.

I asked him if he ever stayed the night with [REDACTED] 2i and he said, *"I can't say for certain when I may have done such a thing. At that time I was working night shift and so, when I would meet her privately, it would be after my shift was over, probably in the realm of 4:00 in the morning. So when you say spent the night, it might've been at night, but I don't think I actually spent the night."* He then clarified that he did go over to her place after work and slept. I asked him how many times and he stated, *"It would be difficult for me to estimate the number of times, but over the course of three to four months, maybe once every other week or slightly more frequently than that."* Corporal Conrath also acknowledged some of those times were also at her apartment that she moved to later.

I then asked him if he ever had sex with her and he admitted he did, both oral and intercourse. I asked him if that occurred on the nights he stayed with her after work and he said, *"I wouldn't say that it was on every one of the nights, but most of them."*

I then pointed out the various entries referencing what appeared to be his work schedule and asked him if he shared that with her. He said he was sure he did and it would be easy for someone to plot out the days he worked and the ones he had off.

I asked him if he ever stopped by her residence while on duty, in uniform. He said, *"I probably saw her at some point in time while I was working, but I will clarify there was no inappropriate conduct during those times. I might be talking about a brief coffee break, or saying hello during my lunch hour, or something like that. There was no sexual interaction while I was on duty."* I asked him if this included her apartment at the Ashton Apartment complex and if it was while on duty. Corporal Conrath said, *"Yes, I did see her at her apartments. That was where I saw her the majority of the time I did see her. I don't recall a specific example, but yes, I think I probably did stop by to say hello while on a break or something like that. But if I did, it was brief."* I then asked him if it would be a lie for [REDACTED] 2i to claim that she gave him oral sex at the apartment while he was on duty and Corporal Conrath said, *"Correct."*

Corporal Conrath also confirmed that the entries in the calendar with references to "cancer" and "tumor" were from him confiding in [REDACTED] 2i that his own wife was battling cancer at the time.

I asked him if he also told her at some point that he was being investigated by his agency regarding a relationship he had with another female in the course of his employment. Corporal Conrath acknowledged he did at some point, but no definitive date on when that occurred could be established. I followed up by asking if he told her not to tell anyone. He stated, *"I don't remember specifically saying that. However, although she was divorced at the time, I was still married. I was having an extramarital affair with another woman. So, I think it was well known between the two of us that I didn't want that to be public information. I was keeping secrets from my wife at that time."* I then asked him if he was concerned our agency would learn of this relationship. He replied, *"I don't remember being specifically concerned about that. I guess it's an admission of my own ignorance perhaps, but I didn't see this at that time, as a violation of policy. I thought I was engaging in an off duty, personal relationship that should not have been of concern to the Police Department at that time. I was later involved in an Internal Affairs investigation for something that I think is significantly different, but comparable, and that was the period of time at which I remember breaking things off with [REDACTED] 2i"*

I then asked Corporal Conrath when he ended this relationship. He said he couldn't remember the exact date and time due to it being over five years ago. He said, *"The way I remember this in my own mind was like I said. I was naïve and I was engaging in stupid behaviors that I thought I was only making a mistake in my personal life. At the point that I was advised that there was a pending Internal Affairs investigation for this other incident, it was a bit of a defining moment in my life where I knew that I*

didn't want to be engaging in that sort of activity any longer at a minimum. It was at that point that I spoke with her and ended things. So, it was at about that same period of time, whenever that was."

I referenced the IA interview he had with then-Sgt. D. Staben on 10/06/15 and asked him if that helped him recall when he ended his relationship. He said, "In my memory, it was somewhere around that exact period of time when I came to the realization that this was a problem for me and that I broke things off with [REDACTED] 2i So, yes, I would say it was in very close time frame to that October 6th date that I ended things with her."

In breaking up with her he said he had a conversation with her and didn't remember having any further communication with her after 10/06/15, but he also said, "I don't remember having any communication with her after that time. That's not to say there may not have been a phone conversation or something like that. I don't want to say with one hundred percent certainty that I never talked to her after that time, but I don't believe I did. I very specifically and intentionally ended that relationship at that period of time." I also asked if he visited her after that date and he said, "I do not think that I did. I know that in ending a relationship like that, there's a certain element of apology that has to take place. Obviously, I was sorry to her for having to end things that abruptly. So, I may have spoken with her about it shortly thereafter, but as far as the relationship itself it was ended at that time." He also said he did not have sex with her after that date.

In regards to his earlier statement about this relationship with [REDACTED] 2i being "significantly" different than the one he had with [REDACTED] 2q in the other case, I asked him to explain what he meant. Corporal Conrath said, "In the second incident, [REDACTED] 2q was technically listed as the victim, having been the victim of a crime. [REDACTED] 2i was not. In fact, there was really no crime that occurred. No, I didn't feel it could be argued that there was a conflict of interest on my part. I didn't feel like it was affecting my performance or effectiveness as a police officer. I freely acknowledge that the second case was blatantly wrong, though I didn't necessarily realize it at the time. I was educated during that Internal Affairs interview and the disciplinary process that followed. [REDACTED] 2i was not the victim of a crime. She was not involved in a domestic dispute. She was a person that I did meet while on duty and though it was not my intent at that time, I did develop a personal relationship with her to involve physical intimacy. That did happen, but at that time, I thought it was very different than the second case for those reasons."

Based on this answer I was having trouble in understanding what the "significant" difference was so I asked Corporal Conrath for more clarification. There was an objection by Guild President Honaker over asking the question again and Corporal Conrath ended the string of questioning by definitively saying [REDACTED] 2i was not a victim of a crime.

I then showed Corporal Conrath a copy of the transcript from his interview with Sgt. Staben on 10/06/15. In that interview he made the statement at the end, "All I would add is that I freely recognize that this was my wrongdoing and I made a big mistake and I take responsibility for it. This kind of thing would never happen to me again." I asked him if he recalled making that and he said he did. I asked him what he meant and he stated, "*I meant that I understand what this is about, I understand what happened, I understand that what I did was wrong, and I have already paid dearly for that mistake that I made. And I will not find myself in that situation again, meaning I will not do this again.*" To clarify his earlier statements that he may or may not have had contact with her after that date I asked him if he ended the relationship before then and he replied, "*I'm saying that when I was advised of the pending Internal Affairs situation, the problem that I was dealing with here, that was the point at which I made the decision to terminate my relationship with [REDACTED] 2i*" I tried to ascertain how long before that interview but he could not remember any specific dates or times.

I also asked Corporal Conrath if he told any co-workers or supervisors of the relationship he was having with [REDACTED] 2i He said he didn't and did not see any reason to. I asked him if he had ever

had any other relationships of a sexual nature with any other victims, witnesses or anyone that was initiated while on duty and he said, ***"Absolutely not. Like I said in 2015, I suffered a great deal and never would I do that again."*** I also asked him if he thought the relationship he had would reflect poorly upon him or the department." He answered, ***"Well, it absolutely reflects poorly on me and my fitness to be a husband to my wife. I'm ashamed of this. Now if you're asking if I would be judged by my coworkers, perhaps. I can't say."*** At this point in the interview the guild objected to my line of questioning on the basis that Corporal Conrath did not know at the time he was violating any policy and that an adulterous act was not a policy violation. Guild President Kris Honaker also objected to the calendar that was being offered for reference because it had not been clearly established if [REDACTED] 2i created it or if there was anyone else's handwriting on it. My final question to Corporal Conrath was on whether the entries in the calendars appeared accurate before October and he said they were consistent. However he said the ones in December and January were not accurate because he did not believe he was having any contact with her at that time.

Lt. M. Cowles asked Corporal Conrath if he was aware of any grudges [REDACTED] 2i had against him and he said he did not. He also asked him when he became aware there was a complaint that was being looked into on this matter. Corporal Conrath said the first indication was when [REDACTED] 2i ***took it upon himself to contact my wife directly at work."*** Lt. Cowles asked him if he ever considered coming forward about the relationship and Corporal Conrath said he did not. He said, ***"I looked at this as an incident that occurred five plus years ago, which preceded an incident I was involved in where I received a significant discipline and I corrected those behaviors. And I've made huge strides in my life since that time, both personally and professionally. When at that time my marriage was falling apart, I've repaired it. I haven't had any hiccups at work since that time and I thought in my mind that this incident was in a different category. I perceived no conflict of interest between myself and [REDACTED] 2i and I looked at this as just an ex-husband who had an axe to grind and was trying to notify my wife to hurt me."***

Lt. Cowles' asked Corporal Conrath if he disputed [REDACTED] 2i claim that they had a sexual relationship all the way until January of 2016 and he said he would and that it did not continue until then.

Guild President K. Honaker objected to the process of the investigation and that [REDACTED] 2i had not been questioned about the calendar before our interview with Corporal Conrath. He also went on the record to object to the initiation of an internal investigation of an incident that occurred over the year statute of limitations in SPD policy 1020.2.3. Ofc. Honaker's final question to Corporal Conrath was if he'd tried to mislead, lie or misstate facts in the 2015 interview he had with Sgt. Staben. Corporal Conrath said, ***"No I did not."*** He also said he answered all questions truthfully in this interview.

Physical Evidence

CAD report, Ride-A-Long waiver, Photos of May 2015 to January 2016 calendar provided by [REDACTED] 2i

Investigative Summary

On 10/06/2020 I was directed by then-IA Lt. S.J. Wohl to conduct an inquiry into potential policy violations that occurred in 2015 and 2016. I was made aware that although the statute of limitations for investigating policy violations was one year, the nature of the allegations were serious and I was directed by Lt. Wohl to commence an internal review.

This complaint originated when [REDACTED] 2i sent Lt. Wohl an online complaint submission form. In that message he indicated that then-Officer Chris Conrath responded to a domestic situation at [REDACTED] 2i. During the call for service, he claimed Ofc. Conrath exchanged personal phone numbers with his estranged wife, [REDACTED] 2i. An inappropriate sexual relationship ensued from 06/06/2015 until at least 12/19/2015. Some of those meetings it was believed the officer was on duty. [REDACTED] 2i said he was in possession of notes taken by [REDACTED] 2i that were on 2015-2016 calendars that journal their relationship.

I listened to the recorded call made by Lt. Wohl to [REDACTED] 2i. In that he stated he had renewed his relationship with his ex-wife [REDACTED] 2i and recently came across a 2015 calendar that had entries believed to be by her that eluded to her engaging in a relationship with a police officer. [REDACTED] 2i added that there were notes about her going on a ride with Ofc. Conrath as well as going to a gun range. This concerned him especially because she had two previous failed suicide attempts. Lt. Wohl asked [REDACTED] 2i if he thought [REDACTED] 2i would be willing to talk with an IA investigator and he expressed he was not confident she would cooperate with us.

I located a CAD dispatch record which indicated that Ofc. Conrath was dispatched to a "DV MALM" on 05/27/15 at approx. 1900 hrs. at [REDACTED] 2i. The complainant, [REDACTED] 2i, discovered her sprinkler wires and tubing cut. She thought it was caused by her husband [REDACTED] 2i and added they were going thru a nasty divorce. Ofc. Conrath arrived at 1912 hrs and was on the call until 2027 hrs. He cleared by changing the call type to "SUSCIR". No report was taken and notes were entered by him stating, NO ACTUAL DAMAGE TO ANY OF [REDACTED] 2i PROPERTY, NO CRIME, SYSTEM DID NOT APPEAR TO HAVE BEEN WINTERIZED PROPERLY, I BELIEVE SHE HAS A DAMAGED VALVE WHICH WILL NEED TO BE REPLACED. I attempted to find any documents related to this call in LERMS or body worn camera video in Evidence.com. There were no records in either source.

I examined the photos of the calendars sent to me by [REDACTED] 2i. I also later confirmed with [REDACTED] 2i it was a copy of her calendars and the written entries were all made by her. In those pictures I searched for any entries that appeared to give reference to Ofc. Conrath.

The first entry was on May 27th, 2015 where it appeared to say "Policeman came". This was corroborated by the CAD entry as well as Ofc. Conrath and later by [REDACTED] 2i. Subsequent entries like June 4th 2015 where it said "Shooting 1st lesson Chris" and June 26th, "Ride Along Chris" were also corroborated by Ofc. Conrath, [REDACTED] 2i and a copy of the Ride-along Waiver that was filled out by [REDACTED] 2i and then-Ofc. Conrath.

There were three entries referencing "Chris stayed night" on June 6th, July 2nd and 3rd. I also noted there were several entries referencing "Chris came over after work" on June 22nd, July 14th, and August 21st. These same dates also showed in Telestaff that Ofc. Conrath worked Powershift. More commonalities with Telestaff appeared in the calendar where it referenced "Chris on duty, Chris

back to work, C to work, Chris start to work, and Chris last work". I noted on July 11th it stated "Chris stopped by during wk" and other dates that he showed in Telestaff to be working on June 25th, November 30th and December 19th indicated "Chris came over". However it was unknown if they were while he was off or on duty. [REDACTED] 2i also stated Ofc. Conrath came by on 08/19/15 in uniform and met her friend Laurel. There is an entry on this date, "Chris met Laurel".

I was not able to locate in our records from IA case C15-085 of when Ofc. Conrath was first notified of the IA investigation however the IA PRO usage log indicates he was named as the alleged officer on 09/22/15. The interview that Lt. Staben conducted with him was on 10/06/15. In that interview transcript I found where Ofc. Conrath stated, *"All I would add is that I freely recognize that this was my wrongdoing and I made a big mistake and I take responsibility for it. This kind of thing would never happen again to me."* Ofc. Conrath stated in his interview with me on 10/29/2020, that he learned on 10/06/15 that his ongoing relationship with [REDACTED] 2i was improper and he ceased his relationship from that day on. In contrast, there was an entry in the November calendar on the 30th that stated "Chris came over". Then in December there was another entry on the 19th which said "Chris came over. Chris last day work" and again on January 11th "Chris came over. Chris daytime coffee lunch". The final entry appeared to be on 01/14/16, "Talked to Chris on phone".

In the January 2016 calendar there was an entry on the 7th stating, "Chris last day. Chris sent home early 1mo off = 2mo". I researched this further as it appeared to be information that would be personal in nature and only known by SPD or Ofc. Conrath. I discovered that he attended his Loudermill hearing the day before, on 01/06/15 for the C15-085 case. In the findings letter issued by then-Chief R. Dobrow, Ofc. Conrath was sanctioned with a suspension from work for 30 actual working days of which two days of accrued leave could be used. I found that Telestaff corroborated that his schedule with regular days off, did not put him back to work until 03/03/2016. I further found an email written by then-Lieutenant J. Anderson to then-Captain D. Torok, stating that Ofc. Conrath was sent home early on January 7th. This prompted a follow-up interview on 11/12/2020 with [REDACTED] 2i to ask her if she wrote the entry on that date. She acknowledged she probably did but could not recall why she did or when.

In reference to an entry on 01/13/2016, "Chris on the news", I found an Inlander article about the internal investigation conducted on him and the 30 day suspension. There was also a KHQ news release that date which stated he was facing a 30 day suspension.

I also conducted a New World and CAD search of any other calls for service that [REDACTED] 2i made where Ofc. Conrath responded to and none were found. I had records supervisor Mardee Ellis also conduct a search for any NCIC/WACIC inquiries of [REDACTED] 2i that he made. Again, no others after the initial call on 05/27/15.

My investigation is complete and I am forwarding it to the chain of command for review.

Sgt. A. Dollard #937

SPOKANE EXHIBIT *7*

C20-074 Timeline

05/27/15: Officer Conrath responds to a DV Mal Mis call at [2i] residence reference her belief that her husband, [2i] damaged the sprinkler system at the house.

05/28/15: Officer Conrath texted [2i] asking if there was "any luck" with her sprinklers (per calendar entry)

05/30/15: "Chris to fix sprinklers" per calendar entry.

06/01/15: "Chris sprinkler" per calendar entry.

06/06/15: "Chris stayed the night" per calendar entry.

06/11/15: "Shooting 1st lesson Chris" per calendar entry.

06/22/15: "Chris came over after work" per calendar entry.

06/25/15: "Chris stopped by 2x took me home" per calendar entry.

06/26/15: [2i] goes on ride-a-long with Officer Conrath.

07/02/15: "Chris stayed the night" per calendar entry.

07/03/15: "Chris stayed night" per calendar entry.

07/11/15: "Chris stopped by during work to say bye before Boston" per calendar entry.

07/14/15: "Chris came over after work" per calendar entry.

07/17/15: "Chris called 'tumor'" per calendar entry.

08/02/15: "Chris motorcycle came over" per calendar entry

OTHER CALENDAR ENTRIES REFERENCE CHRIS CONTINUE

09/07/15: Officer Conrath responds to DVOPV call at 3rd and Maple where [2q] alleged that she had been assaulted by her husband, Brent Roundtree.

Officer Conrath cleared the call at 2233 hours. By 1254 hours the following day Officer Conrath had responded to an e-mail from [2q] in an inappropriate manner.

09/08/15: "Have Chris come over. Chris came over. Asian girl" per calendar entry.

09/09/15: At 0100 hours, while on duty, Officer Conrath meets with [2q] at the Japanese Gardens where he received a hug and kiss from her.

At approximately 0300 hours, after getting off work, Officer Conrath meets with [2q] and engaged in mutual oral sex.

09/16/15: IA receives complaint regarding Officer Conrath having an inappropriate sexual relationship with [REDACTED] 2q

09/17/15: "Chris came in daytime" per calendar entry.

10/06/15: Officer Conrath receives Rights/Responsibilities for Administrative Interviews regarding C15-085.

10/06/15: Officer Conrath interviewed. Makes comment: "All I would add is that I freely recognize that this was my wrongdoing and I made a big mistake and I take responsibility for it. This kind of thing would never happen again to me."

11/30/15: "Chris came over" per calendar entry.

12/16/15: Officer Conrath receives notice of Loudermill reference C15-085

12/19/15: "Chris came over. Chris last day work." Per calendar entry

01/06/16: Officer Conrath Loudermill hearing.

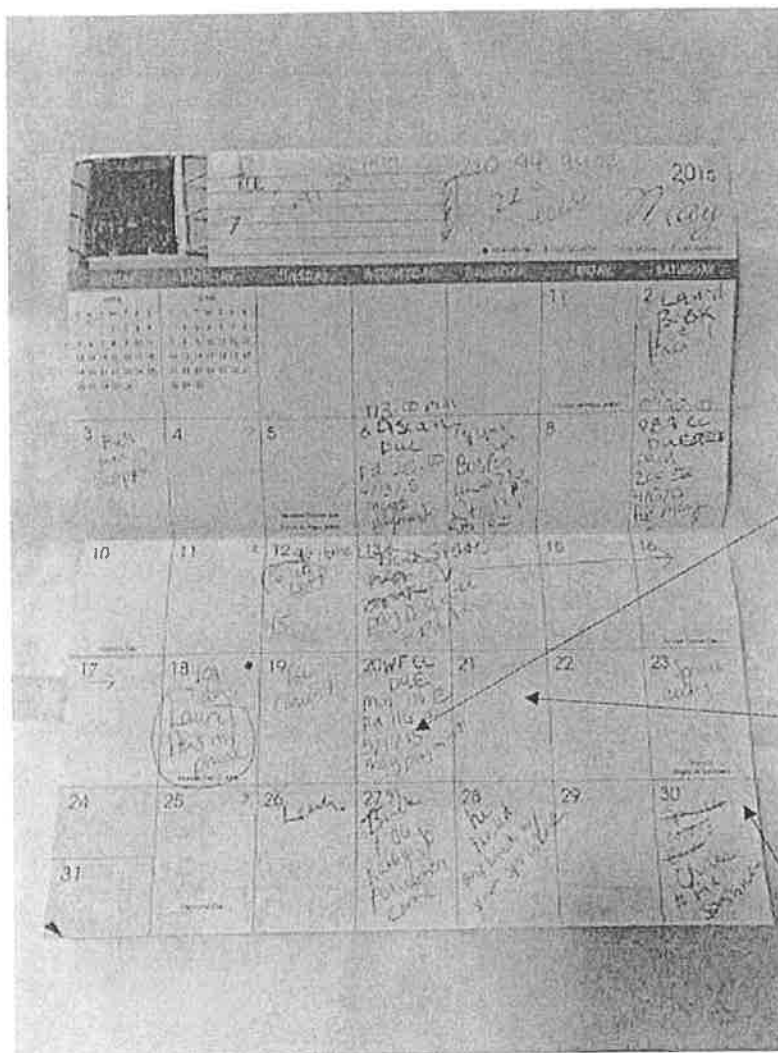
01/11/16: "Chris came over. Chris daytime (daytime coffee lunch)" per calendar entry.

01/13/16: "Chris on news" per calendar entry.

01/14/16: "Talked to Chris on phone" per calendar entry.

09/11/20: Receive complaint stating that Officer Conrath met [REDACTED] 2i on a DV call and struck up an inappropriate sexual relationship with her.

May 2015



May 27, 2015

C: Policeman came

CAD- MALMS at Conrath onscene
at 19:12 hrs.

May 28

C: he texted any luck w/ your sprinklers

Telestaff: Powershift worked

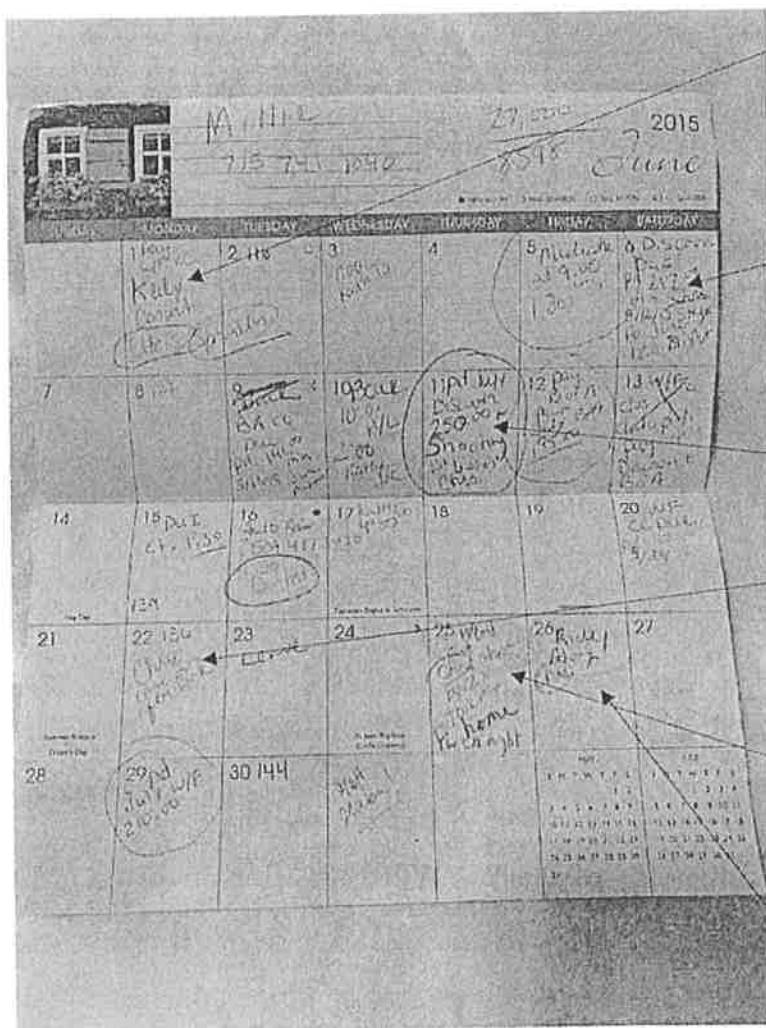
May 30

C: *Chris to fix sprinklers*

Telestaff: RDO

Key: C = Calendar

June 2015



June 1

C: *Chris sprinkler*

Telestaff: RDO

June 6

C: *Chris stayed night*

Telestaff: Switch day off

June 11

C: *Shooting 1st lesson Chris*

Telestaff: Vacation off

June 22

C: *Chris came over after work*

Telestaff: Powershift

June 25

C: *Chris stopped by 2x took me home*

Telestaff: Powershift

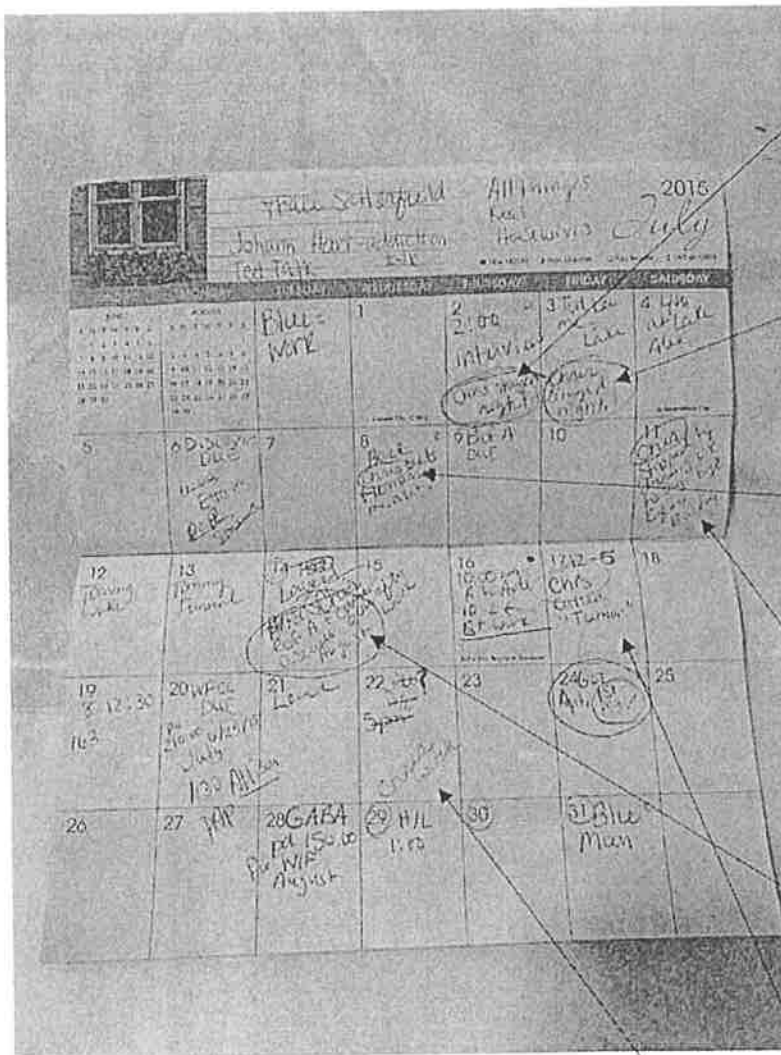
June 26

C: *Ride along Chris*

Telestaff: Powershift

Copy of ridealong form attached to case.

July 2015



July 2

C: *Chris stayed night*

Telestaff: Powershift

July 3

C: *Chris stayed night*

Telestaff: Powershift

July 8

C: *Chris texts he misses me a lot*

Telestaff: RDO

July 11

C: *Chris stopped by during wk. to say bye before Boston*

Telestaff: Powershift

July 14

C: *Chris came over after work*

Telestaff: Powershift

July 17

C: *Chris called "tumor"*

Telestaff: RDO

July 22

C: *Chris work*

Telestaff: RDO

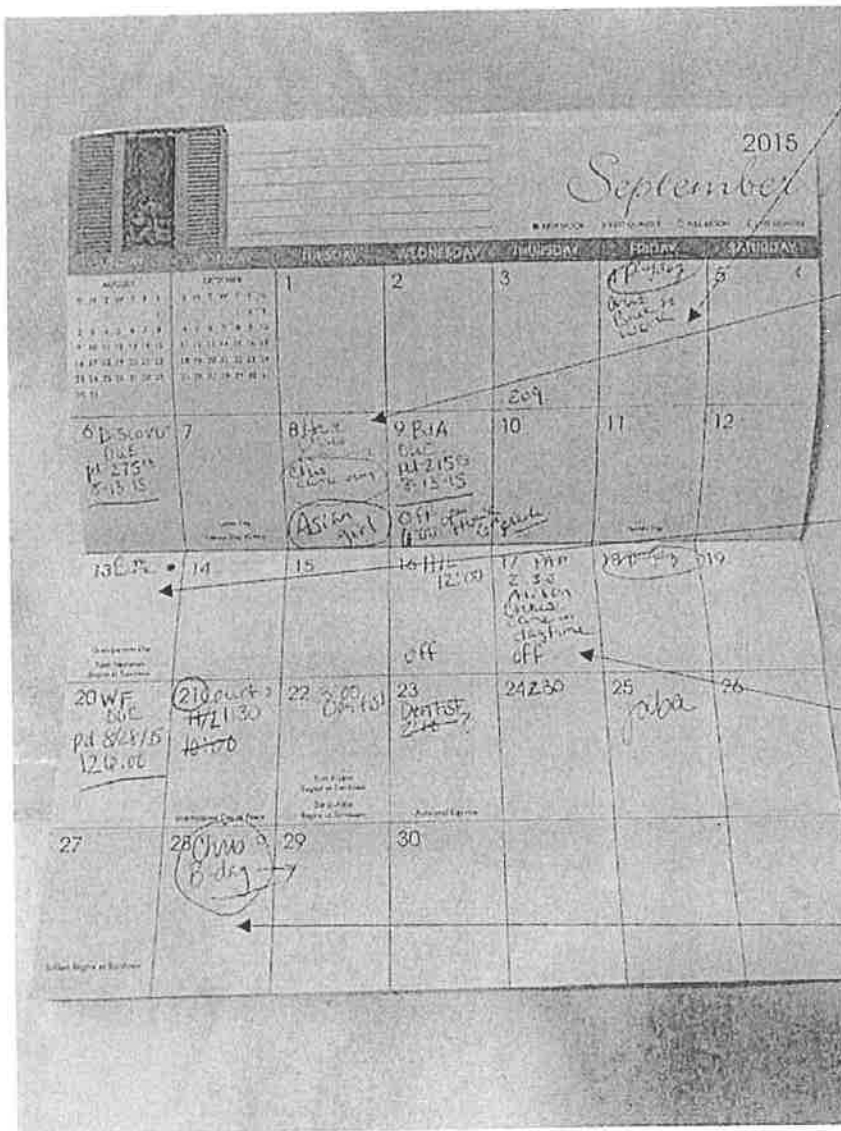
August 2015

Date	Event / Note	Telestaff
August 2	C: Chris motorcycle came over	FMLA off
August 5	C: Chris "cancer"	RDO
August 19	C: Chris met Laurel	Powershift
August 20	C: Chris on duty	Powershift
August 21	C: Chris after work	Powershift
August 26(27)	C: Chris back to work	Powershift
August 29	C: Chris after work	Powershift
August 30	C: Chris [sweet] text	Powershift

Calendar Details:

- August 2:** Chris motorcycle came over
- August 3:** DUI Ct. 1:30
- August 4:** K's Birthday
- August 5:** Chris "cancer"
- August 6:** Discover Due. 3000.00 7-14-15
- August 7:** Pay 1509.00 Rent due
- August 8:** (Blank)
- August 9:** (Blank)
- August 10:** (Blank)
- August 11:** (Blank)
- August 12:** (Blank)
- August 13:** (Blank)
- August 14:** (Blank)
- August 15:** (Blank)
- August 16:** (Blank)
- August 17:** (Blank)
- August 18:** (Blank)
- August 19:** Chris met Laurel
- August 20:** Chris on duty
- August 21:** Chris after work
- August 22:** (Blank)
- August 23:** (Blank)
- August 24:** (Blank)
- August 25:** GAA Artists Shop's HOC 200
- August 26(27):** Chris back to work
- August 28:** Pay WFLC PA 126.70
- August 29:** Chris after work
- August 30:** Chris [sweet] text
- August 31:** (Blank)

September 2015



September 4

C: *Chris back to work*

Telestaff: Powershift

September 8

C: *Have Chris come over. Chris came over. Asian girl*

Telestaff: Powershift

August 13

C: *C to work*

Telestaff: RDO

August 17

C: *Chris came in daytime*

Telestaff: Sick

August 28

C: *Chris B-day*

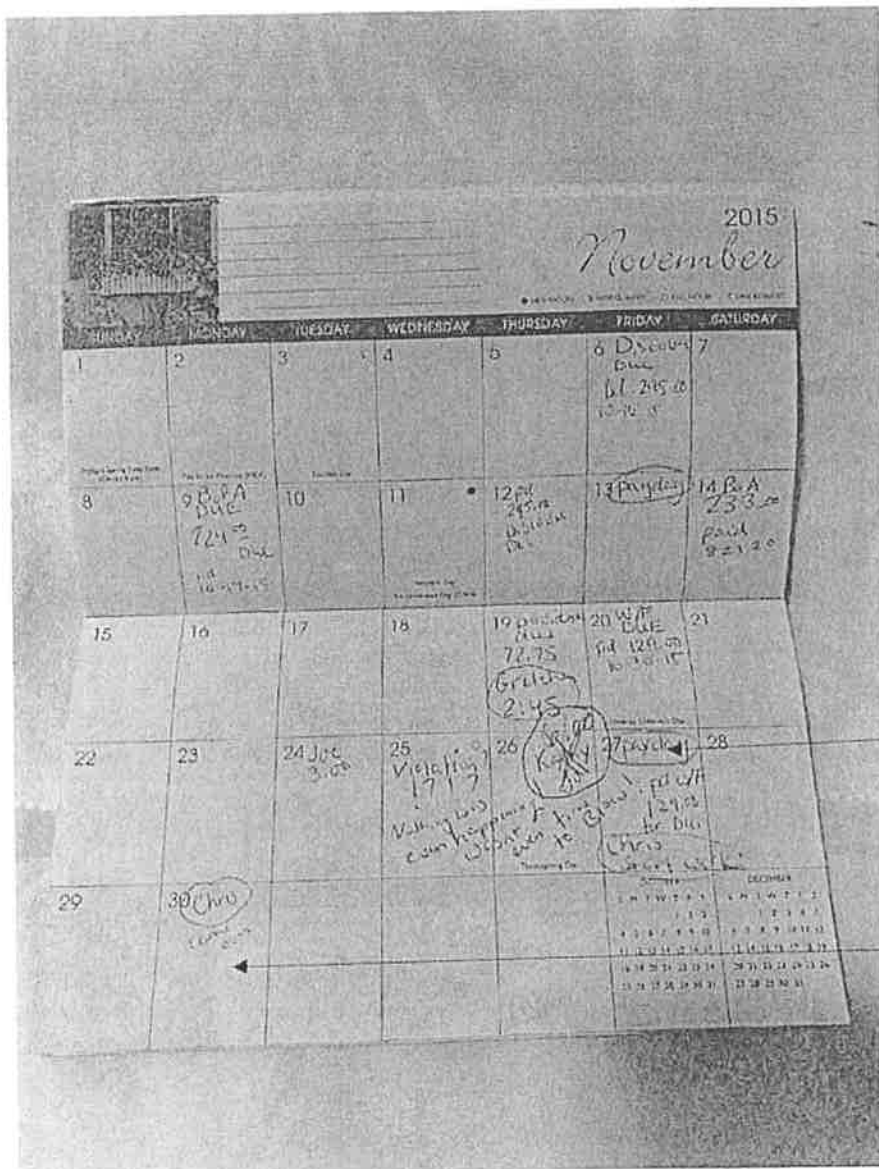
Actual birthday 09/27

October 2015

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
				1	2 <i>Friday</i>	3
4	5	6 D. School Dut. at 215.00 7/12/15	7	8	9 2nd of A Out at 225.00 9/12/15	10
11	12	13	14	15	16 1600-500-17.500	17 5.00 higher 2000pm
18	19 1900-11.00 7.00-7.50 Dut. at 11.00 11.00-12.00	20 W.F. 1.20	21 Cont 1.20	22	23	24
25	26	27	28	29 H/L 10.00am	30 Friday 11.00 Local 12.00	31

No entries referencing "Chris"

November 2015



November 27

C: *Chris start work*

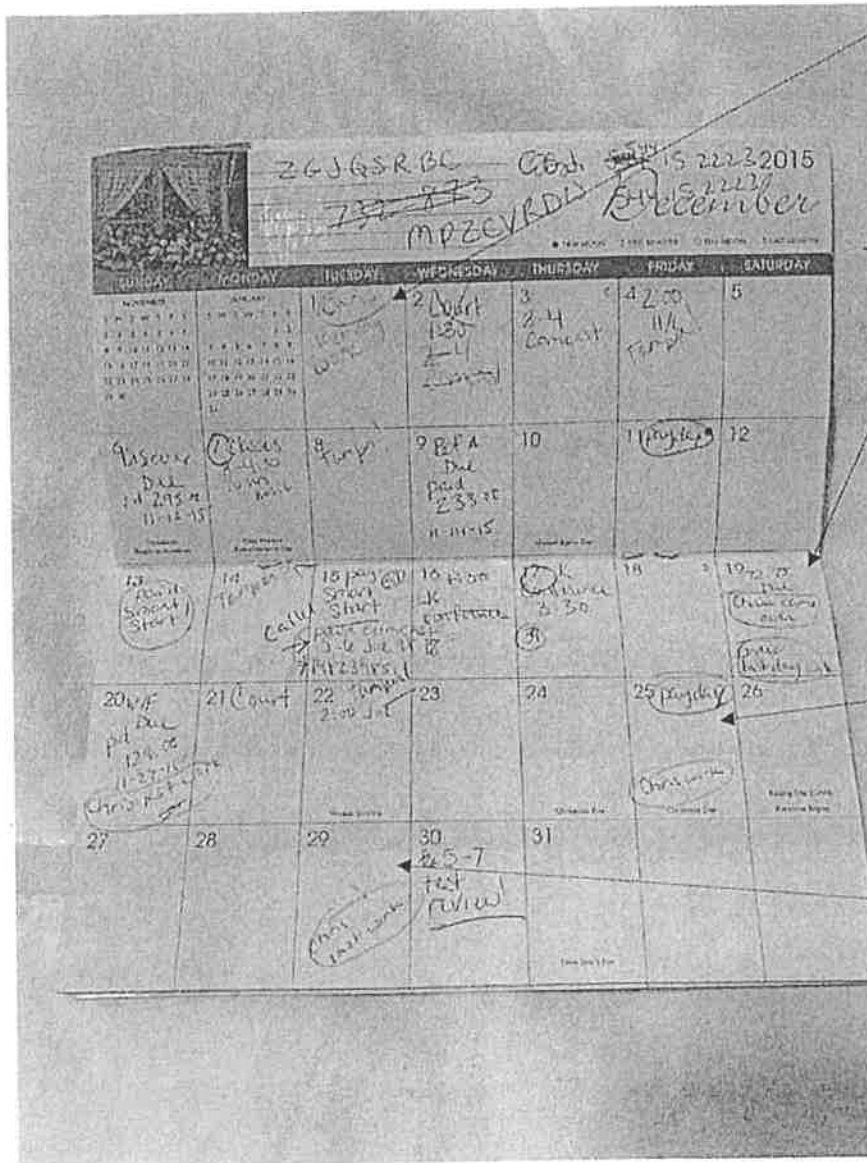
Telestaff: Powershift

November 30

C: *Chris came over*

Telestaff: Powershift

December 2015



December 1

C: **Chris last day work**

Telestaff: Powershift (next day off)

December 19

C: **Chris came over. Chris last day work**

Telestaff: Powershift

December 20

C: **Chris last work**

Telestaff: Powershift (next day off)

December 25

C: **Chris work**

Telestaff: Powershift (first work day)

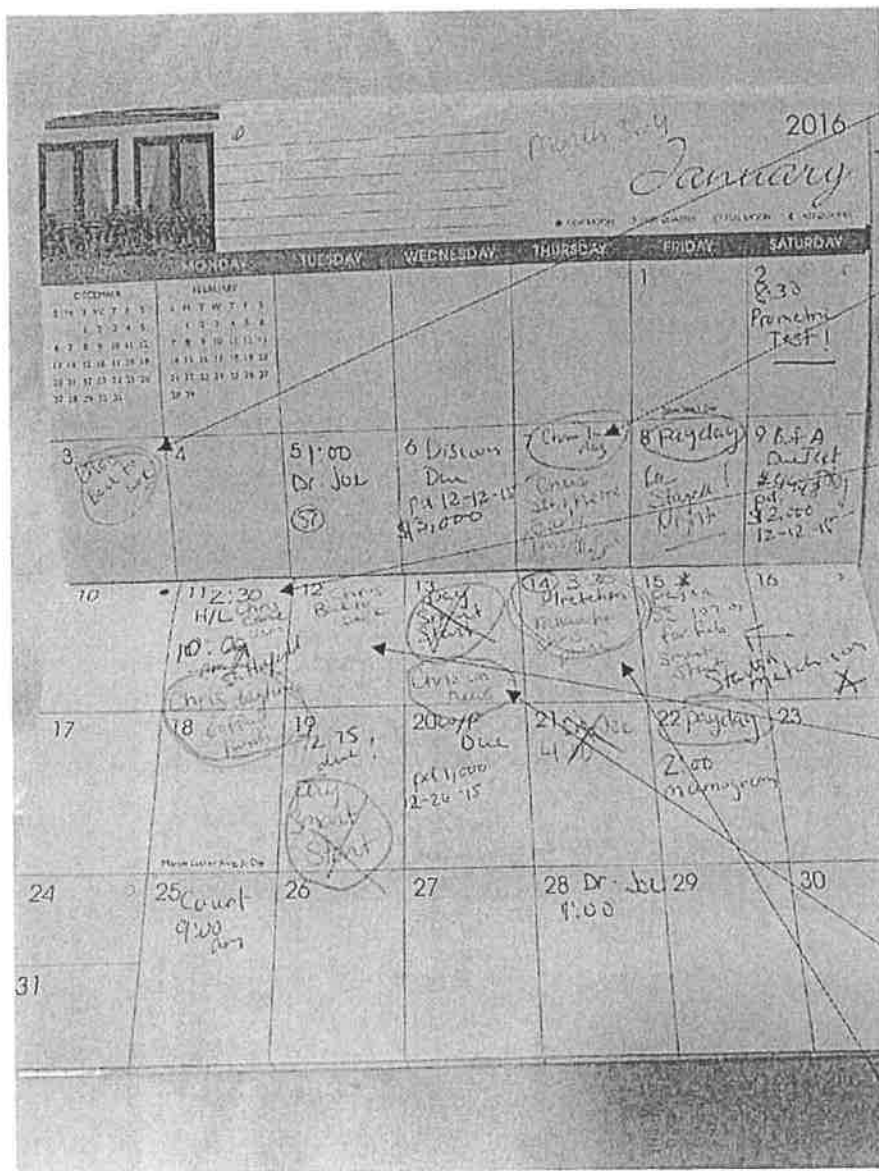
December 29

C: **Chris last work**

Telestaff: Powershift (next day off)

December 16th Loudermill
C15-085

January 2016



January 3

C: *Chris back to work*

Telestaff: RDO

January 7

C: *Chris last day. Chris sent home early 1mo off = 2mo*

Telestaff: Admin leave unpaid

January 11

C: *Chris came over. Chris daytime [daytime coffee lunch]*

Telestaff: RDO

January 12

C: *Chris back to work*

Telestaff: RDO

January 13

C: *Chris on news*

Telestaff: Admin leave unpaid

January 14

C: *Talked to Chris on phone*

Telestaff: Admin leave unpaid

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 22⁰
 2012
 May

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
APRIL 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	MAY 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31				17	2 Land Book Fair
3 Full moon Sept 10	4	5	113.00 min 6 LSC Due pd. 210.00 7/13/15 110000 110000	7 LSC Due Boston 110000 110000	8	98.4 cc Due paid 200.00 4/13/15 For May
10	11	12 go home 16 100 120	13 go home 130 130 130 130	15	16	
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31						



M. Hill

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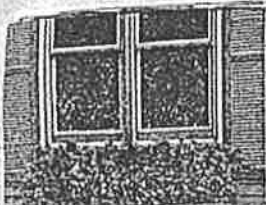
8598

2015

June

● NEW MOON > FIRST QUARTER ○ FULL MOON ◐ LAST QUARTER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY																																																																																																																
	1 Pay w/F CC Kelly Conant Chris Sprinkler	2 116 ○	3 1:00 Kathy Jo	4	5 Medicine at 9:00 am. 1:30	6 Discover DUE Pd 217.00 min Chris 5/12/15 Stayd for June 120 Bright																																																																																																																
7	8 122	9 Back BA CC DUE Pd. 191.00 min 5/13/15 June pay/m	10 Back 10:00 H/L 2:00 Kathy Jo	11 Pd July Discover 250.00 + Shooting 1st lesson Chris	12 Pay Bot A Pd July B/A 195.00	13 W/F CC Chasing date pay pay Discover + Bot A																																																																																																																
14 Flag Day	15 Du I Ch. 1:30 129	16 Auto Rain ? 504 487 3430 11:00 Dentist	17 Kathy Jo 4:00 4:30 Ramadan Begins at Sundown	18	19 Jineteenth	20 W/F CC DUE Pd. 135.00 5/30/15																																																																																																																
21 Summer Solstice Father's Day	22 136 Chris come over after work	23 Leave	24 St Jean-Baptiste (CAN-Québec)	25 Went out Chris stayed by 2x T-Mobile F home Fw en night.	26 Ride! Along! Chris	27																																																																																																																
28	29 Pd July w/F 210.00	30 144	31 144 Alaska!	<table><tr><th colspan="7">MAY</th><th colspan="7">JULY</th></tr><tr><td>S</td><td>M</td><td>T</td><td>W</td><td>T</td><td>F</td><td>S</td><td>S</td><td>M</td><td>T</td><td>W</td><td>T</td><td>F</td><td>S</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td>1 2</td><td></td><td></td><td></td><td></td><td>1 2 3 4</td><td></td><td></td></tr><tr><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td></tr><tr><td>10</td><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td></tr><tr><td>17</td><td>18</td><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td><td>19</td><td>20</td><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td></tr><tr><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td><td>26</td><td>27</td><td>28</td><td>29</td><td>30</td><td>31</td><td></td></tr><tr><td>31</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>		MAY							JULY							S	M	T	W	T	F	S	S	M	T	W	T	F	S							1 2					1 2 3 4			3	4	5	6	7	8	9	5	6	7	8	9	10	11	10	11	12	13	14	15	16	12	13	14	15	16	17	18	17	18	19	20	21	22	23	19	20	21	22	23	24	25	24	25	26	27	28	29	30	26	27	28	29	30	31		31														
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Traci S. Harfield
Johann Hari-addiction
Ted Talk

All Things
Real
Housewives

2015
July

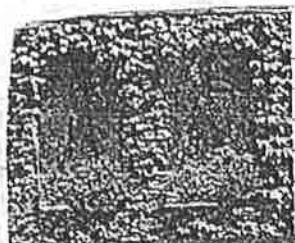
● NEW MOON ☾ FIRST QUARTER ○ FULL MOON ☾ LAST QUARTER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
<p>JUNE</p> <p>S M T W T F S</p> <p>1 2 3 4 5 6</p> <p>7 8 9 10 11 12 13</p> <p>14 15 16 17 18 19 20</p> <p>21 22 23 24 25 26 27</p> <p>28 29 30</p>	<p>AUGUST</p> <p>S M T W T F S</p> <p>1</p> <p>2 3 4 5 6 7 8</p> <p>9 10 11 12 13 14 15</p> <p>16 17 18 19 20 21 22</p> <p>23 24 25 26 27 28 29</p> <p>30 31</p>	<p>Blue = work</p>	<p>1</p> <p>Canada Day (CAN)</p>	<p>2</p> <p>2:00 Interview</p> <p>Chris stayed night</p>	<p>3</p> <p>Ted Lee me - Lake</p> <p>Chris stayed night</p>	<p>4</p> <p>4th at Lake Alex</p> <p>Independence Day</p>
<p>5</p>	<p>6</p> <p>Discover DUE</p> <p>11:00 Ethos on PBS</p>	<p>7</p>	<p>8</p> <p>Paul Chris tests H. misses mealot.</p>	<p>9</p> <p>B of A DUE</p>	<p>10</p>	<p>11</p> <p>Chris stopped by during wk. to say bye before Boston</p>
<p>12</p> <p>Tommy Wade</p>	<p>13</p> <p>Tommy Funeral</p>	<p>14</p> <p>10:00 Lunch B of A + Chris Discusses August</p>	<p>15</p> <p>Chris work</p>	<p>16</p> <p>10:00 am R. to Ad 10-2 St work</p> <p>Eid al-Fitr Begins at Sundown</p>	<p>17</p> <p>12-5 Chris called "Turner"</p>	<p>18</p>
<p>19</p> <p>8-12:30 163</p>	<p>20</p> <p>WFCC DUE</p> <p>pa 210.00 6/29/15 July 1:30 All in</p>	<p>21</p> <p>Leave</p>	<p>22</p> <p>11:00 5pm Chris work</p>	<p>23</p>	<p>24</p> <p>Got Apt. (1st pay)</p>	<p>25</p>
<p>26</p>	<p>27</p> <p>PAP</p>	<p>28</p> <p>GABA pt. 150.00 for WIFE August</p>	<p>29</p> <p>H/L 1:00</p>	<p>30</p>	<p>31</p> <p>Blue Moon</p>	

2015

August

● NEW MOON ☾ FIRST QUARTER ○ FULL MOON ☾ LAST QUARTER



SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
<p>JULY</p> <p>S M T W T F S</p> <p>1 2 3 4</p> <p>5 6 7 8 9 10 11</p> <p>12 13 14 15 16 17 18</p> <p>19 20 21 22 23 24 25</p> <p>26 27 28 29 30 31</p>	<p>SEPTEMBER</p> <p>S M T W T F S</p> <p>1 2 3 4 5</p> <p>6 7 8 9 10 11 12</p> <p>13 14 15 16 17 18 19</p> <p>20 21 22 23 24 25 26</p> <p>27 28 29 30</p>					<p>(1) \$09.00 Rent Due</p>
<p>(2) Chris motor cycle came over</p>	<p>3 DUI Ct. 1:30</p> <p>Civic Holiday (CAN)</p>	<p>4 Kell's Birthday</p>	<p>5 Back Chris Cancer</p>	<p>6 Discover DUE pd. 300.00 7-14/15</p>	<p>7 payday</p>	<p>8</p>
<p>9 BOFA DUE pd. 200.00 7-14-15</p>	<p>10 All mail goes to new address Century link</p>	<p>11 Laurel</p>	<p>12 11:00 moubrs 12-4 Direct TV</p> <p>OFF</p>	<p>13</p> <p>OFF</p>	<p>14 pay • Discoun pd 275.00 + 1 pay - pd 215.00 Sept</p>	<p>15 For Sub</p>
<p>16</p>	<p>17</p>	<p>18</p>	<p>19 Chris met Laurel</p>	<p>20 WF DUE pd 7-28-15 150.00 Chris on duty</p>	<p>21 payday Chris celebrat after work.</p>	<p>22</p>
<p>23</p>	<p>24</p>	<p>25 GABA Avista Shops Here 200</p>	<p>(26)</p>	<p>27 Chris back to work.</p>	<p>28 pay w F C pd 126.00</p>	<p>29 Chris After work</p>
<p>30 Chris Sweet first</p>	<p>31</p>					



2015

September

● NEW MOON ☾ FIRST QUARTER ○ FULL MOON ☾ LAST QUARTER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
AUGUST S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	OCTOBER S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1	2	3	4 <i>payday</i> Chris Back to work	5
6 <i>Discover</i> DUE Pl. 275.00 8-13-15	7 Labor Day Labour Day (CAN)	8 <i>Have</i> Chris come over. <i>Chris</i> come over <i>Asian</i> girl	9 <i>B&A</i> DUE Pl. 215.00 8-13-15 OFF 8:00 op's house G. grade	10 209	11 Patriot Day	12
13 <i>to</i> work	14	15	16 <i>H/L</i> 12:00 off	17 <i>PAP</i> 2:30 Chris. come in daytime off.	18 <i>payday</i>	19
20 <i>WF</i> DUE Pd 8/28/15 126.00	21 <i>Court</i> H/L 1:30 10:00 International Day of Peace	22 3:00 Dentist Yom Kippur Begins at Sundown Eid al-Adha Begins at Sundown	23 <i>Dentist</i> 2:45?	24 230	25 <i>gabe</i>	26
27 Sukkot Begins at Sundown	28 <i>Chris</i> <i>B-day</i>	29	30			

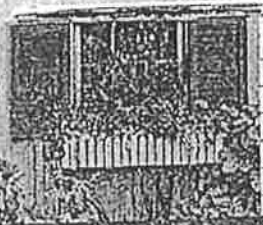


2015

October

● NEW MOON ☾ FIRST QUARTER ○ FULL MOON ☾ LAST QUARTER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
SEPTEMBER S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30	NOVEMBER S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30			1	2 <u>payday</u>	3
4 Shemini Atzeret Begins at Sundown	5 World Teacher's Day Shemini Torah Begins at Sundown	6 DISCOUNT Due Pl. 295.00 9/12/13	7	8	9 BoFA Due Pl. 225.00 9/12/13 32007	10
11	12 Columbus Day Thanksgiving Day (CAN)	13 Al Hiyra Begins at Sundown	14 ●	15	16 <u>payday</u>	17 Bill mahan 8:00 pm
18	19 PROVIDING 72.75 Due! Pd #903747	20 W/F DUE Pl 9-28-15 130.00	21 Court 1:30	22	23	24 United Nations Day
25	26	27 ○	28	29 H/L 10:00am	30 <u>payday</u> 11:00 Courtney Pl W/F 129.00	31 Halloween



2015

November

● NEW MOON ☾ FIRST QUARTER ○ FULL MOON ☾ LAST QUARTER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
1	2	3	4	5	6 Discoun Due Pd. 295.00 10-16-15	7
Daylight Saving Time Ends (Clocks Back)	Día de los Muertos (MEX)	Election Day				
8	9 BoFA DUE 224.00 Due pd 10-17-15	10	11 Veteran's Day Remembrance Day (CAN)	12 pd 295.00 Discoun Due	13 pay day	14 BoA 233.00 paid 8-21-20
15	16	17	18	19 provide due 72.75 Gritches 2:45	20 W/F DUE pd 129.00 10-30-15	21
22	23	24 Joe 3.00	25 Violation 1717 Nothing was even happening went to court	26 Thanksgiving Day	27 pay day Chris start work	28
29	30 Chris came over					
OCTOBER						DECEMBER
S M T W T F S						S M T W T F S
1 2 3						1 2 3 4 5
4 5 6 7 8 9 10						6 7 8 9 10 11 12
11 12 13 14 15 16 17						13 14 15 16 17 18 19
18 19 20 21 22 23 24						20 21 22 23 24 25 26
25 26 27 28 29 30 31						27 28 29 30 31



ZGJGSRBC

Cost

544 15 22232015

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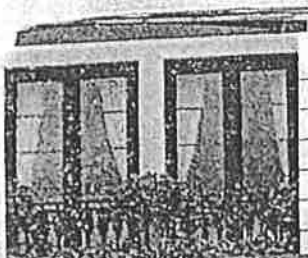
MPZCV

RDW

December

NEW MOON FIRST QUARTER FULL MOON LAST QUARTER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
NOVEMBER S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30	JANUARY S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1 Chris last day work	2 Court 1130 2-4 Comcast	3 2-4 Comcast	4 2:00 H/L Tamp.	5
6 Disc. & Due pd 295.00 11-12-15 Hanukkah Begins at Sundown	7 classes 8-4:30 70 hrs. Basic Pearl Harbor Remembrance Day	8 Tamp.	9 Bof A Due paid 233.00 11-14-15	10 Human Rights Day	11 pay day	12
13 paid Smart Start	14 Tamp.	15 pay Smart Start called paid Comcast 5-6 Joe 98.18 148239851	16 1:30 K conference	17 K conference 3:30 (31)	18	19 12.15 Due Chris came over Chris last day work
20 WIF Due pd 129.00 11-27-15 Chris last work	21 Court	22 Tamp. 2:00 Joe Winter Solstice	23	24 Christmas Eve	25 pay day Chris work Christmas Day	26 Boxing Day (CAN) Kwanzaa Begins
27	28	29 Chris last work	30 5-7 test review!	31 New Year's Eve		



March 3 or 4

2016

January

● NEW MOON ☾ FIRST QUARTER ○ FULL MOON ☾ LAST QUARTER

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
DECEMBER S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	FEBRUARY S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29				1	2 8:30 Prometric Test!
3 Chris Back to work	4	5 1:00 Dr. Joe (57)	6 Disclaim Due pd 12-12-15 \$3,000	7 Chris last day Chris Sent home early 1mo 10 = 2mo	8 Pay day Lee Stapel Night	9 Bof A Due Test #4448 Day pd. \$2,000 12-12-15
10	11 12:30 H/L Chris care over 10:00 am St. August Chris day time	12 Chris Back to work	13 Day Smart Start Chris on news	14 3:30 Metchen Tailored to Chris in phone	15 * Pay day SS 107.00 for Feb Smart Start Started match.com X	16
17	18 Coffee lunch	19 12.75 due! Play Smart Start	20 2000/P Due pd 1,000 12-24-15	21 Dr. Joe 4:00	22 pay day 2:00 mamogram	23
24	25 Count 9:00 am	26	27	28 Dr. Joe 11:00	29	30
31						

SPOKANE EXHIBIT 8

Dollard, Arthur

From: [REDACTED] 2i
Sent: Thursday, October 8, 2020 9:41 PM
To: Dollard, Arthur
Subject: [REDACTED] 2i Text

[CAUTION - EXTERNAL EMAIL - Verify Sender]

Sgt Dollard,

This text was sent by [REDACTED] 2i to me after I questioned her about having Chris Conrath's work schedule marked out on her calendars through 3/2017. Those dates overlap when we had sought to reconcile in 11/2016, hence the comments about cheating.

I really think it's harmful to involve [REDACTED] 2i in this situation. That was a horrible time in her life and she has bravely fought her way back and is sober and part of her daughters life again. To have to re-live, or even re-tell, any of this puts her at risk of relapse. That can't happen. Her alcoholism puts her at immediate risk of fatality as she has been admitted to the hospital in the past with blood alcohol levels around .4.

I understand why you need to verify every facet of what I have presented to fairly administer department policy in this matter. I must however end my family's involvement in this matter and attempt to build on the progress we have made. I will still answer your questions on Tuesday, but that will be my final involvement. As you can imagine, this is difficult on me as well.

One thing that I did not mention to you was that I did talk with [REDACTED] 15 about this situation about a month ago. [REDACTED] 15 is Chris Conrath's wife. I made her aware of the situation and went over dates with her. We have had no further conversations.

Thank you,
[REDACTED] 2i

SPOKANE EXHIBIT 9

Spokane Police Department

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- B. The accused officer leaves employment.

An allegation classified as a Closed investigation shall be deemed closed and will be in lieu of a chain of command or ARP review. Closed investigations are sent to the OPO for review.

Complaint - A matter in which the complaining party requests further investigation or which a department supervisor determines that further action is warranted. Such complaints may be investigated by a department supervisor of rank greater than the accused employee or referred to the Internal Affairs Unit depending on the seriousness and complexity of the investigation.

The Spokane Police Department does not accept complaints involving:

- A. The elements of a criminal case which has already been before the court and resulted in a conviction or guilty plea; or
- B. An active civil claim against the Spokane Police Department and/or the City of Spokane

Inquiry - Questions about employee conduct which, even if true, would not qualify as a personnel complaint may be handled informally by a department supervisor and shall not be considered complaints.

Mediation - Is a voluntary process and an alternative to investigation, adjudication and the disciplinary process. Mediation requires agreement by both the officer(s) and the complainant.

1020.2 AVAILABILITY AND ACCEPTANCE OF COMPLAINTS

1020.2.1 AVAILABILITY OF COMPLAINT FORMS

Personnel complaint forms in a variety of languages will be readily available at the Spokane Police Department front desk, on the Spokane Police Department's Office of Accountability web page, or at the Office of Police Ombudsman.

1020.2.2 SOURCE OF COMPLAINTS

- A. Department employees aware of alleged misconduct shall immediately notify a supervisor
- B. Any source alleging misconduct of an SPD employee which, if true, could result in disciplinary action shall be directed to a supervisor or Internal Affairs.
- C. Anyone may file a complaint directly with Internal Affairs or the Office of Police Ombudsman.
- D. Anonymous complaints and third party complaints will be accepted and reviewed. Third party complaints of a minor nature will be routed to the employee's supervisor for appropriate action.
- E. Third party complaints received due to information disclosed during a Public Records Request will be reviewed. Internal Affairs will make a determination as to the extent of an investigation based on the seriousness of the policy violation.

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1020.2.3 ACCEPTANCE OF COMPLAINTS

A complaint may be filed in person, in writing, online, or by telephoning the department. Although not required, every effort should be made to have the complainant appear in person. The following should be considered before taking a complaint:

- A. When an uninvolved supervisor determines that the reporting person is satisfied that their complaint required nothing more than an explanation regarding the proper implementation of department policy or procedure, a complaint need not be taken.
- B. When the complainant's credibility appears to be unreliable, the person should be provided with a Citizen Complaint form or a supervisor may take the complaint and cite their concerns.
- C. Depending on the urgency and seriousness of the allegations involved, complaints from juveniles should generally be taken only with their parent(s) or guardian(s) present and after they have been informed of the circumstances prompting the complaint.
- D. Complaints that are not of a criminal nature shall be accepted by the Spokane Police Department up to one year from the date of occurrence consistent with the Spokane Police Ombudsman ordinance.
- E. If the complaint is of a minor policy violation (demeanor, inadequate response, etc.) and the alleged violation can clearly be proven false by evidence (body camera footage, non-biased witnesses, etc.) available to the supervisor taking the complaint, no BlueTeam report is necessary. The supervisor should document the allegation and pertinent information in a manner that will allow him/her to access that information at a later time if needed.
- F. Any complaint of a serious nature, regardless of whether the receiving supervisor believes the allegation to be false, will be documented in BlueTeam and forwarded to IA for investigation.

1020.2.4 COMPLAINT DOCUMENTATION

Complaints of alleged misconduct shall be documented by a supervisor in (BlueTeam). The supervisor shall ensure that the nature of the complaint is defined as clearly as possible.

When a Personnel Complaint form is completed in person, the complainant should prepare a detailed narrative of his/her complaint. If circumstances indicate that this is not feasible, the complaint may be dictated to the receiving supervisor. In an effort to ensure accuracy in any complaint, it is recommended, if practicable, that a recorded statement be obtained from the reporting party. A refusal by the complainant to be recorded shall not alone be grounds to refuse to accept a complaint.

1020.3 SUPERVISOR RESPONSIBILITY

In general, preliminary and follow-up investigative responsibility for some administrative complaints shall rest with the employee's immediate supervisor. The Chief of Police or authorized designee may, however, direct that another supervisor, Internal Affairs, or Human Resources, investigate the complaint. The supervisor shall be responsible for the following:

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- A. Receiving a complaint involving allegations of a potentially serious nature shall ensure that the Shift Commander is notified as soon as practicable.
- B. Receiving or initiating a complaint, or conducting a preliminary investigation, shall ensure that a BlueTeam entry has been completed as fully as possible to include the names and contact information of all involved parties and witnesses, collection of evidence, photographing of alleged injuries as well as areas of non-injury, etc. The supervisor will send the complaint to Internal Affairs by the end of his/her shift. The Internal Affairs Lieutenant will determine if the allegation is criminal or administrative. If the allegation is criminal, the Internal Affairs Lieutenant will notify the Director of Strategic Initiatives and the Chief of Police. A decision will then be made as to the proper method of investigation.
- C. When the nature of a personnel complaint relates to sexual, racial, ethnic, or other forms of prohibited harassment or discrimination, the supervisor shall immediately contact the shift commander, who will make other notifications in accordance with the DSO policy, if necessary. Internal workplace complaints of this nature will be investigated by Human Resources in coordination with the department's Internal Affairs Unit. The Internal Affairs Unit will ensure that all complaints/investigations are documented, monitored, and reviewed for thoroughness and objectivity.

1020.4 ASSIGNMENT TO ADMINISTRATIVE LEAVE

The Chief of Police may elect to place an employee on administrative leave when circumstances dictate such leave to be in the best interest of the department.

1020.4.1 ADMINISTRATIVE LEAVE

An employee placed on administrative leave may be subject to the following guidelines:

- A. Under such circumstances, an employee placed on administrative leave shall continue to receive regular pay and benefits pending the imposition of any discipline.
- B. An employee placed on administrative leave may be required to relinquish any badge, departmental identification, assigned weapon(s) and any other departmental equipment.
- C. An employee placed on administrative leave may be ordered to refrain from taking any action as a departmental employee or in an official capacity. The employee shall be required to continue to comply with all policies and lawful orders of a supervisor. The employee shall be available to the department by phone and considered in a working status from home during normal business hours, 8:00 am to 4:00 pm., Monday through Friday.
- D. At the discretion of the Chief, as an alternative to administrative leave, the employee may be temporarily reassigned to a different shift (generally normal business hours) during the pendency of the investigation and the employee may be required to remain available for contact at all times during such shift and to report as ordered.
- E. The Chief of Police or designee is authorized to place an employee on administrative leave.

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1020.5 ALLEGATIONS OF CRIMINAL CONDUCT

When an employee of this department is accused of potential criminal conduct, a separate supervisor or assigned investigator shall be assigned to investigate the criminal allegations apart from any administrative investigation. The separate administrative investigation may parallel the criminal investigation, however only after the criminal investigation and any prosecutorial review are complete or by an order of the Chief of Police will the involved officer(s) be compelled to provide a statement. No information or evidence administratively obtained from an employee may be provided to a criminal investigator.

The Chief of Police shall be notified as soon as practical when an employee is formally accused of criminal conduct. In the event of criminal allegations, the Chief of Police may request a criminal investigation by an outside law enforcement agency.

An employee accused of criminal conduct shall be provided with all rights and privileges afforded to any other person under the law.

Any law enforcement agency is authorized to release information concerning the arrest or detention of a police officer which has not led to a conviction. However, no disciplinary action other than non-disciplinary paid administrative leave shall be taken against the accused employee based solely on an arrest or crime report. An employee charged with a crime may be placed on unpaid layoff status in accordance with Civil Service Rules.

1020.6 ADMINISTRATIVE INVESTIGATION OF COMPLAINT

Whether conducted by a supervisor, an assigned member of the Internal Affairs Unit, or the Human Resources Department, the following procedures shall be followed with regard to the accused employee(s):

- A. Interviews of accused employees shall be conducted during reasonable hours, preferably when the employee is on duty. If the employee is off duty, the employee shall be compensated.
- B. No more than two interviewers, and the Ombudsman if present, may ask questions of an accused employee.
- C. Prior to their interview, an employee shall be informed of the nature of the investigation. If the employee is the subject of the investigation, he or she shall be given a general overview of the factual allegations in writing before the interview commences.
- D. All interviews shall be for a reasonable period and the employee's personal needs shall be accommodated.
- E. No employee shall be subjected to offensive or threatening language, nor shall any promises, rewards or other inducements be used to obtain answers. Any employee refusing to answer questions that are narrowly tailored to establish the facts of the investigation or the employee's fitness to hold office may be ordered to answer questions administratively or be subject to discipline for insubordination. Nothing

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administratively ordered may be provided to a criminal investigator, except at the direction of the Chief.

- F. Absent circumstances preventing it, the interviewer shall record all interviews of employees and witnesses. If the employee has been previously interviewed, a copy of that recorded interview shall be provided to the employee prior to any subsequent interview if requested by the employee.
- G. Any employee who becomes the subject of a criminal investigation shall, prior to their interview, be notified that he/she is the subject of a criminal investigation and, further, that he/she is under no obligation to answer any questions or to remain in an interview setting involuntarily. A criminal investigation shall be interpreted as any investigation which could result in the filing of a criminal charge against the employee. Upon the completion of any criminal investigation an administrative investigation may be initiated. Any interview that is conducted as part of an administrative investigation will be mandatory for the employee.
- H. All employees subjected to interviews that could result in punitive action shall have the right to have a Collective Bargaining Unit representative present at any interview. In addition, they may also have legal representation at their own expense. These representatives may participate to the extent allowed by law.
- I. All employees shall provide truthful and non-evasive responses to questions posed during interviews.
- J. An investigator will not ask for, nor will an employee be compelled to submit to, a polygraph examination, nor shall any refusal to submit to such examination be mentioned in any administrative investigation.

1020.6.1 ADMINISTRATIVE SEARCHES

An employee of this department may be ordered to submit to a blood, breath, or urine test for alcohol and drugs as allowed by law.

Any employee may be compelled to disclose personal financial information pursuant to proper legal process.

Employees shall have no reasonable expectation of privacy in the use of city computers, telephones, radios, and electronic devices, and, in city property including desks, lockers, file cabinets, and vehicles, provided that employees retain a right of privacy in the personal possessions contained therein. Absent permission of the employee, no locker or vehicle search (excluding regular vehicle inspections) shall be conducted unless in the presence of a bargaining unit representative. Any removed items shall be inventoried.

1020.6.2 ADMINISTRATIVE INVESTIGATION FORMAT

Investigations of personnel complaints shall be detailed, complete and follow the IA additional format.

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1020.7 DISPOSITION OF PERSONNEL COMPLAINTS

Each allegation shall be classified with one of the following dispositions:

Unfounded - When the investigation discloses that the alleged act(s) did not occur or did not involve department personnel.

Exonerated - When the investigation discloses that the alleged act occurred, but that the act was justified, lawful and/or proper.

Not Sustained - When the investigation discloses that there is insufficient evidence to sustain the complaint or fully exonerate the employee.

Sustained - When the investigation discloses sufficient evidence to establish that the act occurred and that it constituted misconduct.

Training Failure - Deficiency in training was the cause of the alleged act.

Closed Due to Mediation - Is an alternative to the investigation, adjudication and disciplinary process.

If an investigation discloses misconduct or improper job performance which was not alleged in the original complaint, the investigator shall take appropriate action with regard to any additional allegations.

1020.8 COMPLETION OF INVESTIGATIONS

Every investigator or supervisor assigned to investigate a personnel complaint shall proceed with due diligence. Recognizing that factors such as witness availability and the complexity of allegations will affect each case, every effort should be made to complete each investigation as required by Collective Bargaining Agreements. If the nature of the allegations dictate that confidentiality is necessary to maintain the integrity of the investigation, the involved employee(s) need not be notified of the pending investigation unless and until the employee is interviewed. All cases are entered and routed using BlueTeam.

(For details regarding conducting an investigation, refer to the IA SOP)

The OPO will be notified by IA within five business days of case closure of all complaints of a serious matter and all complaints originated by the OPO. The OPO, in addition to the department's written Notice of Finding letter to the complainant, may send a closing letter to the complainant. The letter may summarize the case findings.

Any complaining party who is not satisfied with the findings of the Department concerning their complaint may contact the Office of Police Ombudsman to discuss the matter further.

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1020.8.1 CONFIDENTIALITY OF PERSONNEL FILES

All investigations of personnel complaints shall be considered confidential peace officer personnel files (Policy Manual § 1026). The contents of such files shall not be revealed other than as required by law, to the involved employee or authorized personnel, or pursuant to lawful process (RCW 42.56 et seq.; RCW 70.02).

In the event that an accused employee (or the representative of such employee) knowingly makes false representations regarding any internal investigation and such false representations are communicated to any media source, the Department may disclose sufficient information from the employee's personnel file to refute such false representations.

All formal personnel complaints shall be maintained in accordance with Washington State Retention Guidelines in coordination with a representative of the Washington State Archives.

Sustained complaints shall be maintained in the employee's personnel file. Complaints which are unfounded, exonerated or not sustained shall be maintained by the Internal Affairs Unit apart from the employee's personnel file.

1020.8.2 ADMINISTRATIVE REVIEW PANEL

The Administrative Review Panels (ARP) will be chaired by a captain. The panel will be comprised of captains and/or lieutenants.

Responsibilities of the panel:

This panel has review/recommendation authority as well as the authority to direct additional investigation by Internal Affairs into specific facets of the case. Review/recommendation responsibilities will include reviewing the investigation for thoroughness and objectivity.

Process:

- A. Internal Affairs will forward the investigation to the ARP group for review.
- B. Each member individually reviews the report.
- C. The panel chair convenes a panel of the ARP group and reviews the opinions of the panel and discusses any outstanding issues.
- D. The panel develops a memo, documenting the findings of the ARP group. All concurring panel members sign the memo. Panel members who have a dissenting opinion will develop and submit a separate memo outlining their findings and/or recommendations.
- E. The panel chair submits the ARP memo to Internal Affairs via BlueTeam.
- F. Internal Affairs forwards the BlueTeam to the Assistant Chief and Chief of Police for review and/or administration of discipline or Loudermill hearing.

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- G. Panel members should also include in their analysis any tactics, decision-making processes, or policy violations outside uses of force as appropriate. Any dissenting opinions should also be memorialized in a separate memo included in the ARP findings and attached to the BlueTeam.

The process for a deadly force incident ARP (D-ARP) will be the same as stated above, except that the Director of Strategic Initiatives and the Ombudsman will be invited to attend and observe D-ARP meetings. The findings and final recommendations will be the exclusive role and responsibility of the D-ARP group. The Director of Strategic Initiatives and the Ombudsman will not participate in deliberations. Should the Director of Strategic Initiatives or the Ombudsman not be available for the scheduled D-ARP, the D-ARP will not be delayed.

ARP and D-ARP members, including the Director of Strategic Initiatives and Ombudsman will preserve the integrity of the process by maintaining the confidentiality of the complaint, panel discussions and the investigative case file.

1020.8.3 OFFICE OF POLICE OMBUDSMAN

- A. The Office of Police Ombudsman (OPO) will provide a professional presence to help ensure a quality investigation in real time, and visible, independent oversight to reassure the public.
- B. See Spokane Municipal Code 04.32, Office of the Police Ombudsman, and the Guild Contract for information regarding the OPO, the Spokane Police Department and internal investigations.

1020.8.4 MEDIATION

Mediation is an alternative to investigation, adjudication and the disciplinary process. The OPO will have the opportunity to make a recommendation for mediation to the Chief of Police, prior to investigation. In the event the department, the complainant and the officer all agree to mediation, that process will be utilized rather than sending the matter on for investigation. Assuming the officer participates in good faith during the mediation process, the officer will not be subject to discipline and no disciplinary finding will be entered against the officer. Good faith means that the officer listens and considers the issues raised by the complainant, and acts and responds appropriately. Agreement with either the complainant or the mediator is not a requirement of good faith. In the event an agreement to mediate is reached and the complainant thereafter refuses to participate, the officer will be considered to have participated in good faith.

1020.9 ANNUAL REVIEW AND ANALYSIS OF COMPLAINTS

An annual review and analysis of all internal investigations shall be conducted by the Office of Professional Accountability and approved by the Chief of Police. Any policy, procedure, training and/or personnel issues that are identified during this review process shall be addressed.

SPOKANE EXHIBIT 10

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: Sergeant Art Dollard

JM: Director Jacqui MacConnell

2i

AD: We are now beginning this interview. The date is October 22nd, 2020 and the time is now 2:52 PM. Present with me is 2i Conducting the interview is Sergeant Art Dollard and Director Jacqui MacConnell from Internal Affairs. We are conducting this interview at 2i 2i The interview is being recorded. The IA tracking number is C20-074. All records generated during this investigation are public record and maybe provided for public inspection at the request of any person. If you have, having filed a complaint with a law enforcement agency, feel that your life, physical safety, or property are in danger, you can request anonymity pursuant to RCW 46...or 42.56.240. Based upon these requirements, are you requesting that your identity be kept confidential?

2i Yes.

AD: Okay. Can you just tell me what your concerns are in that?

2i I'm just super private person, like all my life I've been that way, so just per...it's a personal kind of effect of just 2i

AD: Okay, understand. Can you please state your full name and spell your last name.

2i

AD: And would you please state your address and phone number.

2i

AD: Spokane Municipal Code 10.07.020 states a person who knowingly makes a false or misleading material statement to a public servant is guilty of a gross misdemeanor. "Material statement" means a written or oral statement reasonably likely to be relied upon by a public servant in the discharge of his official powers or duties. Do you understand that statement?

2i No.

AD: So, if you make a statement that you know to be false, and you purport it as being the truth, that you can be charged with a...

2i Oh, yeah.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: ...gross misdemeanor. Okay. So, let me just for the record say you know, we are investigating the possibility that one of our officers, he's currently a Corporal, his name is Chris Conrath, he may have engaged in an unethical relationship while on duty as a Spokane Police Officer back in June of 2015 through January of 2016. 2i are you familiar with the name Chris Conrath?

2i Yes.

AD: 'Kay. Can you tell me how you know him?

2i I met him when...

AD: I'm going to move this a little bit closer here, so that...

2i Okay. I met him when I made a call to not 911, but the other number. The Crime Check number I think because my sprinkler system, I went...it wasn't working and I...he was...my ex...my...we're together now, but we were not living together. I was here back then and the sprinkler system wasn't working, so I went back there to see and it looked like wires had been cut. And I thought to me that seemed like something he would do. And so, I said I think my wires may have been cut by my you know, soon to be ex and they sent an officer over. And it was him. And he just came in, you know, it was normal and he looked at my sprinkler.

AD: Uh huh.

2i And then I have no idea what day of the week that...or anything, when that call happened. And looked at it and then he said, "Maybe I can come back this weekend when I'm not on duty and see if I can fix it." So, I said okay. I just thought that was really, you know, nice. And so, he did come back that weekend, I believe, and looked at it. I think he actually...I don't think anything was wrong with it, it was just me being you know, paranoid about what...the person who I came back to could've possibly done. Let's see, so he came back Saturday, looked at it and I think that Saturday, I think it was a Satur...I keep saying Saturday, but don't...don't quote me on that I have the direct...

AD: Uh huh, sure.

2i ...correct date. I'm just saying that whatever day of the week I called, it feels like he said when he had time off and it was very soon after. And I feel like it was a weekend day. Came over, looked at it. I don't think anything happened then. I think...I think we might've hugged and that was it, I think.

AD: Was...was he in uniform that day when...

2i No.

AD: ...he showed up? He was on a day off or something?

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2i Uh huh.

AD: Alright. You mentioned that you guys hugged. Was it...I guess, how long was he over here for?

2i A while. And we were just talking. The thing about it, what struck up the conversation is he is from Cheney also...

AD: Uh huh.

2i ...and I am, too. So, we were talking about oh, what year did you graduate, blah, blah, blah, Cheney stuff. So, then we just started talking. And...

JM: Does the screen go blank?

AD: Yeah, it will. [Unintelligible].

2i Okay. So, I'm...I don't think anything happened that day when he came over, but then I knew there was kind of something there. And me, I was going through a [unintelligible]...you know what I mean. I was...I don't think I was making my best choices.

AD: So, that day...

2i Either.

AD: ...even just that day, that first time that he came over to help with the sprinklers, there...

2i There seemed to be something

AD: ...did you think there was like an attraction?

2i No, I could feel something.

AD: Okay.

2i Yeah, I could feel something. And so, which...which I was a little bit...I was a little bit taken aback by it quite honestly, just 'cause it was a cop. So, when he was being super nice, you know, saying oh, I'll come back and it was just like wow, I don't know...you know what I mean.

AD: Right, like it was...

JM: Yep.

AD: ...like more service than what anyone would expect...

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2i Yeah.

AD: ...a police officer to do.

2i And this was the first time he came over in uniform and was looking at it back there and everything.

AD: And I imagine he was being very nice...

2i Yeah, very nice.

AD: ...and...and helping you out, and it sounds like you were going through a pretty tough time...

2i Uh huh. Yeah.

AD: ...at this point in your life and everything.

2i Yeah.

AD: Did he give you a phone number? Did you guys exchange phone numbers at that meeting?

2i Maybe. I couldn't tell you when we did phone numbers. But was that the right time, or did the ride along come first? No, I know he came over soon to look at the sprinkler and then he...he stayed over one night here. Soon after I first met him, I don't know how soon. I didn't...I didn't have relations with him very much in this. I didn't see him much, but I don't know when I got the phone number. I assume maybe the first time he was here.

AD: Okay.

2i Because that's why he could text me about coming over for the sprinkler situation.

AD: Did...who...who brought up the...the topic of going on a ride along?

2i Oh, he did. I didn't even know there was ride alongs.

AD: Okay. Did he do that over the phone, or did he come by, stop by and see you and say, "Hey would you like to come out for a ride along?"

2i No, he didn't do that. It may have been a text.

AD: Okay.

2i Or we may have talked about it just when he was here, like the night he did stay here.

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AD: Okay. How many times did he come and stay here?

2i Once.

AD: And...so, kind of go back a little bit. Talked about over the course of...so, this first call that he came to...or when he first got here was back on the 27th of May...

2i Uh huh.

AD: ...2015. And then there was a ride along just shortly thereafter...

2i Right.

AD: ...on the 26th of June.

2i Uh huh.

AD: Now, how long did this relationship go on for?

2i It was not anything solid whatsoever. It would be like he was only here once and then I had to get out of this house quickly and get an apartment. And he did come over there, I think he stayed there once.

AD: Okay.

2i But I mean, I didn't ever talk...during this time I didn't talk to him on the phone. It was just texting if anything and it wasn't like...it wasn't...I kind of knew it was what it was. It wasn't like I was really expecting from him like oh, we're going to be in this relationship, you know what I mean. So, and plus he's married, so it's not like calling...hey, you know, it just wasn't like that. It was kind of on that thing...how those type of things...

AD: Uh huh.

2i ...go with guys, I'm sorry to say.

AD: No...no.

2i But on their terms of like yeah, I'll call you when I want to, you know.

AD: Did you...did he tell you that he was married early on?

2i I think he did. I don't know when, but I think he did early on. I think he did do that.

AD: Did he...did he say anything about his marriage, like whether it was good or bad, or...

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2i That's another thing we're talking, the first time he came over because my marriage was obviously going bad and he said his was, too. And so we kind of commiserated on...

AD: Right.

2i ...you know, our marriages...

AD: Sure.

2i ...not going that well. Well, mine was really...divorce was in progress, so...

AD: And...and so, it started out as kind of a...as a friendship with a...I'm just saying, is it fair to say it started out as a friendship that blossomed into something more of a relationship?

2i Uh huh.

AD: Like a...

2i But I think I...you know, I don't think about myself, but yeah. But not really a great friendship 'cause it was just I met him when he came over to look at the sprinkler in uniform. And then when he came over before to fix the...the thing. But I can't remember which came first.

AD: Did you guys ever meet anywhere besides...

2i Huh uh.

AD: ...here or this other place you're talking about...

2i No.

AD: ...your other apartment? Did he come by here in uniform?

2i Only that one time.

AD: One time only he had a uniform.

2i He only came by here in a uniform one time.

AD: And about when was that?

2i The time...the call.

AD: So, on the 27th, May 27th, when he came here for the DV call.

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2i Uh huh.

AD: The sprinkler call, he came in uniform, but after that he never once came in uniform again?

2i No, but not here.

AD: Oh.

2i But he came in uniform one time at my apartment.

AD: Can...what address was that?

2i I don't remember. Ashton Apartments just up Freya.

AD: Okay, I can find that address. Do you remember roughly about when that was?

2i That could've been maybe...I went on the ride along in June, sometime during the summer. I didn't see him that much. Let me see. I had a calendar where I wrote stuff down at this time, if I can find my 2015 calendar.

AD: If you could that would be a huge...

2i Uh huh.

AD: ...huge help.

2i 'Cause I wrote stuff down of like dates, so I have dates. I just don't...I just moved back in here, so I don't know where all...

JM: Do you want her to find it now or after?

AD: We can find it afterward, yeah. Yeah, we can find it afterward. And I just got a few more questions, then we can find that.

2i Okay.

AD: But that'd be great. I mean I...

2i 'Cause that will help me, 'cause I cannot...I can't remember like exactly what, what, what happened you know, on this day, that day.

AD: Right, and if you keep a good log of that, that's a great record.

JM: Two questions, do you remember what apartment you lived in over there?

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2i Ashton Apartments, 2i maybe.

JM: And he...so, he, on that particular day that we're talking about, he visited you in uniform. What transpired on that day?

2i Some kind of sex stuff.

JM: Okay. And you believe he was on duty?

2i I think.

JM: Was he drive...

2i I did...

JM: [Unintelligible]...

2i ...I don't know.

JM: That's...was he...

2i I didn't see the car 'cause the way you go into that apartment...

JM: Oh.

2i ...you just...

JM: Okay.

2i ...come in. I couldn't see the parking lot or anything.

JM: So, you couldn't see if he was in a marked police car or not?

2i I didn't go outside.

JM: You just know he was...he was wearing a full uniform?

2i Uh huh.

JM: Okay. Did you hear...do you recall, when he was there in uniform on that day, do you recall hearing a police radio go off at all?

2i I don't remember hearing that.

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JM: Okay.

AD: But...so, he's wearing a full uniform. This...this sex act...sex act that you're talking about.

2i Uh huh.

AD: Did it happen in his car, or [unintelligible]...

2i No, in my apartment.

AD: In your apartment. So, he...he walked from his car...

2i To my apart...inside my apartment.

AD: Okay. How long was he there for?

2i Not long. I don't know, maybe 30-40 minutes.

AD: 30-40 minutes. I know this is a difficult thing to...to ask you and for you to...but can you tell us...

2i Yes, I went down on him.

AD: Okay. Was that the only thing...

2i That was the only thing.

AD: So, again, using the technical term, oral sex?

2i Yes.

AD: Okay.

2i Ugh, this is so embarrassing.

JM: Don't...

AD: Don't...

JM: Again, you didn't do anything wrong.

AD: You didn't do anything wrong.

JM: This isn't...we're not here because you're in trouble. You have to understand that.

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2i Uh huh.

AD: And this was sometime during the summer. So, in June you went on a ride along. Was it sometime after the ride along, or before?

2i Yeah, after the ride along.

AD: Okay.

2i 'Cause I went in the ride along I lived here for the ride along.

AD: Okay.

2i And I lived at the other place.

AD: Okay. Is it...excuse me. Is it probably written down on a calendar maybe, like when...

2i Probably.

AD: ...you moved? Okay. Did he say anything at that time? Did he make any mention like hey I'm on duty?

2i Huh uh.

AD: Don't tell anybody. Did...nothing was said about that? Okay.

2i Huh uh.

AD: And total amount of time, under 30 minutes, 20 minutes?

2i I would say just around 30. I really...I don't remember...

AD: Okay.

2i ...'cause it wasn't...I don't know, it...

AD: Okay.

2i I don't even know what time it was when he came. I know it was dark out, but I don't know what time.

AD: Did he...did he ask you to do that? Or was it...

2i I can't remember.

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AD: ...was it like suggesting, like hey you should?

2i Not that I remember, but I don't remember. I literally don't...I remember him coming over, I remember doing that, he didn't stay very long and he left. And that was about it.

JM: Do you know if that was the intent behind him going there?

2i Oh.

JM: Like was it intended that he was going there because you were going...

2i I didn't feel that way. I didn't feel that way.

JM: So, that wasn't planned? It just...

2i That wasn't planned.

JM: ...he showed and it happened.

2i Well, it was planned he was coming over, but it wasn't planned of that.

JM: Okay, that's what I...okay. [Unintelligible].

2i To do that. I wasn't planning on...it wasn't like hey I'm coming over and you're going to do this. Or I was like hey come over and I'm...no, none of that.

JM: Okay.

2i It just happened.

AD: Was that the first time that you guys had intimate contact with each other?

2i No, the first time was here, when he stayed the night here one night. And that was soon after the...when he came over to fix the sprinkler. 'Cause I assume we'd been together first and then I went on the ride along, after I'd already slept with him. Is what I'm assuming. Can I...if I grab the calendar it'll be way faster.

AD: Yeah, and we can do that here in just a second 'cause like I say I just got a few questions and then we can nail down some of those times...

2i Okay.

AD: ...and that time of...type of thing.

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2i If I can find [unintelligible].

AD: When he came over that one particular night, was that after work? Before work? Or, I mean was there any indication of anything like that?

2i He wasn't working.

AD: [Unintelligible].

2i He was off.

AD: He was definitely off.

2i Uh huh. Uh huh.

AD: Okay. Did he, at that time, make any...and we're referring to you guys actually had sex that night...

2i Uh huh.

AD: ...when he came over?

2i I'm pretty sure, yeah.

AD: Did he make any references to his job, anything of that nature?

2i I mean I knew he was a cop, but he didn't mention his job in any moments of you know, whatever.

AD: Okay. And then after that time, between now...between then and your...the apartment incident, did...did he come over even off duty?

2i I don't know. That's why I need my calendar.

AD: Okay.

2i 'Cause I have all this marked.

AD: Okay. Okay. How...

2i It's very...it was very sporadic. There wasn't anything that was solid or consistent.

AD: Consistent.

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2i It was just sporadic. I didn't see him often at all.

AD: Did he tell you that he was...did he tell you about some investigation he was involved in regarding someone else, or anything like that? Another woman.

2i An investigation?

AD: Did...

2i [Unintelligible].

AD: ...did he tell you that...

2i No, he told...

AD: ...he was in trouble for something?

2i Yes.

AD: Okay.

2i He told me all about that because he was very concerned that I would say something, too. So, of course when all of that was going down, he reached out to me...'cause I hadn't talked to him. He reached out and said...told me what was happening with this girl, somewhere I think in Manito or some...or no, a thing...something down on 1st and Maple...2nd and...something about that. Some situation he was in and then with this girl, and then he hooked up with this girl, and then her boyfriend or husband, which I guess mine did, did this.

AD: Uh huh.

2i And that you know, there was internal with you guys going on.

AD: Right.

2i And so, he was like, "Are you going to say..." you know, "Are you going to say anything?" And I was like you know, for me I was just like, "No, I mean you're already getting in trouble." You know.

AD: Uh huh.

2i I was just like its fine I won't you know...its fine. I'm not going to say anything. So...

AD: Did he say what would happen if...if somebody said something? Or if you said...

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2i Huh uh.

AD: Did he say that he was like [unintelligible]...

2i He knew it was going down and he was going to be in trouble. How nervous he was talking to...

AD: Okay.

2i ...me on the phone.

AD: Okay.

2i Of like just how he'd had a breakdown, you know, and he totally messed up. Like he was very remorseful of course because of what's going on and he just was really scared and wanted to make sure I was going to keep my mouth shut. Which he didn't threaten me or anything, it was just me to say like that's fine, I'm...you know, whatever.

AD: Did he ever say on any...on more than one occasion like...did he ever say, "I hope you don't tell anybody," or "Are you going to tell anybody?" Was there...

2i Huh uh.

AD: Just the one time that...that he told you about this.

2i Uh huh.

AD: Okay.

2i Yeah.

AD: Did...did he...did he kind of keep you apprised of how that investigation...

2i No.

AD: ...was going?

2i No, no, no, no, no. He just talked to me to make sure I wouldn't say anything and then that was that. And then I saw some stuff on the news and stuff like that.

AD: Did you know if got any sort of discipline...

2i I didn't...

AD: ...or anything?

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2i ...talk to him. I have no idea what happened...

AD: Oh.

2i ...with the actual situation. 'Cause I only talked to him...we talked to say okay, that's fine, I'm not going to say anything.

AD: Uh huh.

2i And I don't think we talked again. No, I did call him though. I did call him one time after that. Not for anything weird, but I had a question about something that I [unintelligible]...legitimately wanted to ask him and that was...there was nothing came of that. It was just I talked to him real quick and that was that, and...

AD: How did this relationship finally end? What...what caused that?

2i I wouldn't call it a relationship.

AD: Well, I...

2i And it ended because...

AD: ...or...yeah.

2i ...it was so sporadic...

AD: Yeah.

2i ...and wide, and the times we saw each other...

AD: Uh huh.

2i ...or talked. So there wasn't really anything there. It was just distant. Of course in the beginning it was like fun and like...

AD: Right.

2i ...ooh, you know.

AD: Kind of exciting, yeah.

2i Yeah.

AD: Yeah.

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2i And I was just in like midst of the divorce and so, it was like okay. There wasn't any ending of like oh, we're not going to do this anymore. I mean that was the ending when he got in trouble, like...

AD: Oh.

2i ...obviously. 'Cause we hadn't been talking anyway and when I...you see my calendar we can see.

AD: Okay.

2i 'Cause I'm pretty sure I wrote it down. There wasn't a lot of communication, so it just ended by fizzling out you know. I wasn't calling him all the time or texting him all the time. He wasn't texting me all the time. Until later when he called and said this is what's happening, I'm going to get in trouble.

AD: Until...oh, until...until late into the relationship he called you and said I'm going to get in trouble for this other one?

2i Uh huh.

AD: Like did...did...he's never called you about...has he ever called you in the past two years?

2i Huh uh.

AD: Three years?

2i Huh uh.

AD: Just five years ago...

2i Uh huh.

AD: ...and that was it?

2i Uh huh.

AD: Okay. Last quick question here. Do you...since then have you thought that what...what he did was inappropriate, maybe it was you know, like...

2i Oh, I think it's inappropriate. I mean especially when I knew...I mean I was grossed out to find out that some other person that he meets on a call down on Maple and 2nd or I don't know where, you know what I mean. That made me feel so gross.

AD: Uh huh.

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2i Just like ugh, I'm just like a used mmm, you know, whatever. He's just going around picking up whoever he wants to and you know, being nice guy and then having sex.

AD: Do you think that his being a police officer had anything to do with...I mean, do you think the influence that he as an officer had in this situation that nobody else maybe in other lines of work, do you think the influence...did he use that to take advantage of you in the situation?

2i Huh uh.

AD: No? Because you guys were...it was both consenting adults.

2i It was just consenting.

AD: Okay.

2i It wasn't anything like I wasn't looking for like super relationship. He had his own way of doing relationships and so, it was just consenting adults and meet you here if I can, or maybe, maybe, or not talk at all. It was not...

AD: Okay.

2i It wasn't like he was my boyfriend.

AD: Right.

2i It was not to that level, not even close to a boyfriend level.

AD: It's kind of like just adults hooking up.

2i Uh huh.

AD: And...

2i That's what it was.

AD: ...and opportunities were...were there for...for two adults and...

2i Uh huh.

AD: ...they were taken advantage...

2i Yeah.

AD: ...of opportunities.

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2i Yeah, that's what it was.

AD: Okay. Okay. [Unintelligible].

JM: So, Officer Conrath, or Corporal Conrath, has a tendency to like to take females to the range. Did he ever take you to the range to go shooting?

2i Yes.

JM: On one occasion?

2i One.

JM: More than one occasion?

2i One. One, one, one.

JM: One. Okay, do you think that...that might be in your calendar as well?

2i Uh huh.

JM: Or...

2i That's in there.

JM: Okay.

2i That's in there.

AD: Would it...to go out to the range, what were you guys doing there? The department's?

2i Just to shoot the gun.

AD: Just to shoot.

2i Yeah, and there was no...there was nothing weird. There was just shooting the gun.

AD: Okay. Were there other officers, were there other people there, or anything like that [unintelligible]?

2i Huh uh.

AD: No...

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2i No. It wasn't the main one. And I don't think he wanted to go there because of that. It was like the one...I don't know 'cause I've only been there once. It's like a barn-ish kind of thing and then like a hill of like dirt and rocks...

JM: Was it...

2i ...is right there.

JM: ...near the river?

2i Uh huh.

AD: Oh okay.

2i Yeah.

AD: I know what you're talking about, yeah.

2i Yeah, it's near the river.

AD: Okay. Yeah, if we can...if you can find those calendars that would be great.

2i Okay, I'm sorry I can't let you guys in. I'm so cold myself.

JM: And just so you...

2i It's just...

JM: I do want you to know at one point she was sitting there.

2i Uh huh.

JM: So she saw us out here, so...

2i That's fine.

JM: I don't know if you pause that.

2i I'll be right back.

AD: I'll pause the recorder here. The time is 3:16. We're back on record again.

2i I wish I just had that 'cause...

AD: The time is now 3:18 PM.

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2i ...so much easier. He found my calendar, my husband, and that's how it started of saying what is all this. Of me marking all these things and so, I told him and then he went on a search of calling his wife, calling Chris' wife, and saying oh did she talk to men and then, and then. Which is not healthy at all, but I'm talking about my husband [unintelligible].

JM: So, your husband recently called Chris Conrath's wife?

2i Yeah, like digging for information.

AD: Do you know what the nature of that conversation was like? I mean...

2i Because it was just more of him not thinking...my husband not thinking I'm telling him the truth.

AD: Uh huh.

2i That I have not talked to Chris Conrath...

AD: Okay.

2i ...for five years.

AD: Okay. And...and you know, being a guy, again I understand you know the...the complexities of that, too, and I...I can...I mean, it sounds like you guys are really trying to work this...

2i We are.

AD: ...this thing out. And good for both of you guys, if that...

2i Uh huh.

AD: ...if that be the case. It sounds you guys have both been through a lot. It sounds like, almost like a made for lifetime you know movie.

2i Uh huh.

AD: So, is there anything at all that I mean we should know about any of this stuff? 'Cause like I say, it matters...it matters personally. We...we take our...we take our career, this job, very, very, seriously and...

2i Uh huh.

AD: ...we want to keep our reputation as being a good...

2i [Unintelligible]...I understand.

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AD: ...trustworthy department. And all that stuff.

2i I understand.

AD: And...and if you know, Officer Conrath, now Corporal [unintelligible]...Conrath is doing these type of things and it...

2i I'm sure he's...if he is, I'm sure he like, when it all came down, he like...

AD: Uh huh.

2i ...didn't, didn't, didn't, didn't...

AD: Yeah.

2i ...until he felt safe.

AD: Yeah,...yeah, and it...I mean it might've been a really bad year for him, too, I mean with what was going on with his life and then you know, these...these two type of...types of things going on and then he gets in big trouble and everything, so...

JM: Are you pretty sure that after you found out about the other relationship, that you and he had no further in person contact?

2i I think we may have once, at that apartment. I think. I know he came over there to talk to me about the situation that he was in, 'cause...yeah, he came over...oh, if I had my calendar. He came over there to talk to me that he was going to get into trouble and you know, things...I might be hearing things or something, and I think we did have sex that day and I...that was the last time. And then he called me...after he came over, he did make a phone call to me 'cause I remember I was at my mom's...or maybe he made the phone call first. I can't remember, but that's again the same phone call, the same...he just wanted...the same intent was to just tell me you know, this is going on, make sure...are you going to stay quiet.

AD: Because...did he say what would likely happen to him if you...

2i He...

AD: ...came forward?

2i Huh uh, no.

AD: Did say that...

2i He didn't say anything.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: ...like if you say anything, this is what's going...

2i Not at...

AD: ...to happen?

2i ...not at all.

AD: Okay. In total, the...the number of times that you guys had sexual relations, how many times was that total?

2i One...two...maybe four...or three.

AD: Okay.

2i I can't remember. My calendar would be better, but I don't think I marked sex on there.

AD: Okay.

2i But I just marked...If it said "Chris over," then that probably means it. That's why I mark my calendar.

AD: Okay.

2i I just don't know where it is.

AD: Did he stay more than like if he came over for one night, did he stay for a total of two nights, or did he...

2i Huh uh.

AD: ...come over a weekend?

2i No.

AD: Just...just [unintelligible].

2i The first time I met him when he came over very recently after trying to fix the sprinkler, he stayed that night and just that. And I think he might've stayed one night at that other apartment. And then there was the incident when he came over in uniform at that apartment. One, two, three...I'm only coming up with three, including the oral sex. Three or four. I can't be certain right at this minute.

AD: And you didn't meet somewhere remotely like a parking lot, a motel, anything like that?

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i Huh uh. Just here and that apartment.

AD: Okay.

JM: And he has not contacted you any time in the recent past?

2i Huh uh.

AD: Have you seen him, even at a...I mean 'cause Spokane's still a fairly small town.

2i I haven't seen him anywhere.

AD: You haven't seen him anywhere.

2i I haven't seen him in all that time.

AD: Okay. Okay.

2i Since 2015 'cause I think I talked to him in January, like there might've been a phone call, but nothing of relationship...

AD: Uh huh.

2i ...thing. It was probably just a thing. I don't know if that's when I called him about whatever question I had, but the sexual part of everything was pretty much in the early beginning. God if I had that calendar. And very sporadic, not anything...

AD: It's five [unintelligible]...

2i Not relationship material.

AD: ...it's five years ago, that's been a...that's been a while.

2i And a lot has happened...

AD: Yeah.

2i ...in five years.

AD: I'm sure. I'm sure.

2i Thinking about my thing with Chris Conrath is like not even important in my brain.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: Well, good. And it...and it shouldn't be. You go on with your life...

2i Uh huh.

AD: ...100%. Absolutely...

2i Uh huh.

AD: ...go on with your life. I totally agree with that. Well, yeah, if you do find those calendars...

2i I want to have that calendar 'cause then you guys will know exact dates.

AD: Yeah.

2i And...

AD: If...if you do find it, that'd be...that'd be great.

2i Okay.

AD: You have my number.

2i Yep.

AD: You can give me a call. And again, you know, if something else comes up that you know, you think is important for me to know...

2i Okay,

AD: ...by all means, give me a call. It'll go right to my desk. If I'm there I'll answer it. If...if not, it'll go to a message and then I'll get all...

2i Okay, 'cause I'm so scared, I want to have the right times and everything. I don't want to get in trouble for saying something wrong.

AD: Well, you're not.

2i But I have my calendar to back me up and be like this is the...

AD: Yeah.

2i ...this is real 'cause I'm not lying. I just...

AD: Yeah.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i ...don't remember like which came first all the time.

AD: Right and...and 2i I want to...I want to assure right now, you've been in credibly helpful, you really have. And nowhere do I get an indication from you that you're...you're lying, you're telling me you know, something...you're just...you're being very forthright and I appreciate that. And that's...and it's tough to talk about especially to two people you've never met before. Again...

2i It's probably better...

AD: Yeah.

2i ...than talking to it with my like mother or someone.

JM: And you won't...and you're not going to get in trouble. This was five years ago.

2i Yeah.

JM: You're not going to know exact dates. If you had your calendar, that's great.

2i Uh huh.

JM: Just because you say oh I think it was this chain of events, but maybe your calendar might show something else...

2i Uh huh.

JM: ...you're not getting in trouble for that.

2i Okay.

JM: Our...our...our concern is that you tell the truth in terms of what happened...

2i Uh huh.

JM: ...in a relationship with Chis Conrath. We understand five years ago you're not going to remember events exactly as...as they happened.

2i Okay, thank you...

JM: So...

2i ...for that. 'Cause I don't.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

JM: You are not getting in trouble.

AD: Not...not a bit. Not a bit.

2i Okay.

AD: And you know, we...we want to be out of your life as much as possible so that we...you know, you'd go on with your life and...

2i Uh huh. Well you guys have been super nice and...

AD: Thank you.

2i ...helping to like calm me down.

AD: No, you're very well put together. You're...you and...I mean, you know, in these situations it wouldn't be uncommon that we get somebody just shut the door you know, in our face and we would understand that as well, too.

2i Oh, I would much rather have you in, but she just got here and...

AD: No.

2i ...it can't...

AD: Tote...

JM: No.

AD: ...totally got to...take care of your...take care of your personal life. Take care of your family and everything, and move on with your life. Do...

2i Yeah.

AD: ...do what you do and that's...you know, you seem like a really good person and that's...

2i Oh, thank you.

AD: ...that's all that matters yeah.

2i You guys, too. Thank you.

AD: You're welcome. Well, I think...I think if there's anything else, again probably shouldn't be. I have what I need which is, you know...

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i Uh huh.

AD: ...is enough, and if you find those calendars, just you know, give me a call.

2i I will. For sure. I just...I'm still organizing. Everything is a mess and my 2015 calendar is not like top priority on like getting taken out of a box.

JM: I'm surprised you still have a 2015 calendar.

AD: Yeah, you're...

2i That's my weirdness...

AD: Yeah.

2i ...too. I keep all my calendars, too, 'cause I write stuff, so much like...

AD: Right.

2i ...when did that happen and then I can always go back, so it's like...

AD: Right. I get reminded all the time I have an appointment in five minutes and I don't even keep the reminders for that. So, you're doing [unintelligible]...

2i You probably do it on your phone though.

AD: Mmm, yeah, but I don't check it very often.

2i See I do it...

AD: I'm not very tech...

2i ...the old fashioned. I need a calendar

AD: I'm not very tech savvy.

2i Me neither.

AD: And my wife reminds me all the time, did you know you have an appointment? It's on the calendar. Where's the calendar? Alright, well, thank you very much. Okay.

2i Thank you guys.

AD: We're going to...

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/22/2020 Time: 2:52 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i Thank you.

AD: ...we're going to conclude this interview.

[End of Recording]

SPOKANE EXHIBIT 11

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: Sergeant Art Dollard

JM: Director Jacqui MacConnell

2i

AD: We are beginning this recording. The time is 2:07 pm. The date is November 12th, 2020. Present is 2i myself, Sergeant Dollard and Director Jacqui MacConnell from Internal Affairs. This is reference case C20-074. 2i do you recall the statement regarding making false or misleading statements?

2i

Yes.

AD: Do you...do you understand that statement?

2i

Yes.

AD: Okay and were you also wishing to be kept anonymous or your records protected on this case?

2i

Yes.

AD: Okay. Did you have something to add there?

2i

Yes.

AD: Go ahead.

2i

Did he call you back to say...ask questions about my calendars or did he give you...when did he give you pictures of my calendars? When he called at first or...?

AD: The very beginning. The very beginning. 2i or...

2i

'Cause I could've answered questions on my calendar last time. I wish I could've found them.

AD: No, I understand and that's...that's why I have them right now is to...is to clear that up to find out and verify with you about those calendars.

2i

Okay.

AD: Okay. So, I'm gonna show you...

2i

I better get my glasses.

AD: Okay. So 2i these are like pictures of the calendar that I copied off, okay?

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i I can't believe he gave you my frickin' private calendars. I mean, there's other stuff on there that's just my stuff.

AD: And the only things that I've highlighted on these were...were things that looked like they were referenced to...

2i That's fine...sure.

AD: To Chris.

2i Uh hmm.

AD: And just again, for the record when I say the word "Chris", are you familiar with an Officer with the first name Chris?

2i Yes.

AD: And what...what is his last name that you know of?

2i Conrath.

AD: Okay. So in looking at these, would you mind looking at these calendars and the areas that I've highlighted that have direct references to Chris. Can you tell me whether or not those...if that is...those are entries made by you or your handwriting?

2i These are all mine.

AD: Would you mind...just again for the record taking a look to see?

2i I'm sorry you guys, this is just too much for me to deal with. My personal stuff...these are all...this is mine. It's all mine.

AD: I...I want to show you one last one and right here in January it says this. If you can look here with me. On the 7th it says "Chris, last day".

2i That's when he got in trouble.

AD: Okay and I'll go down a little bit further, it says "Chris sent home..."

2i Early.

AD: "Early".

2i One month off...

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: Equals...

2i Two months. I don't know what that means.

AD: Does this look like your handwriting right there?

2i Yes.

AD: Can you tell me what you think that's in reference to? What that entry was made for?

2i Because he told me that...at some point he would've told me that he got in trouble because he was...he knew I came down at that...the other girl.

AD: Uh hmm.

2i And so he told me what was going on and he just told me that was his last day. He was...he...whatever it says, he was sent home early. "One month off equals two months." I don't know what that means.

AD: Do you have roughly an idea of when he would've told you that he was gonna be getting in trouble or getting some sort of time off?

2i It's so hard 'cause I need two different...I gotta get to the eye doctor.

AD: I'm the same way.

2i 'Cause I can't see far. It used to be that was my problem and then I turned, like 44 and I couldn't see close and now it's really bad. There's [unintelligible]. He would've told me way before, let me just go back. Okay, so he would've told me here.

AD: He would've told you back in September?

2i Because...or no; maybe I marked that then. I don't know when he would've told me because I think I marked that. "Chris came over. Asian girl." That might've been the night he told me about that instance that something went down and that her boyfriend or whoever it was contacted you guys.

AD: Okay.

2i So I think I knew it...about then, is what I think.

AD: As far as like what he was going to get for discipline, [unintelligible], January.

2i [Unintelligible].

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: Right here, January 7th. So how did you know that he got sent home early that night?

2i He told me.

AD: Do you remember...

2i He must've told me.

AD: That night?

2i I don't think that night.

AD: You don't think so?

2i I don't remember 'cause it's just things I'll jot down.

AD: Okay.

2i Like when he told me...I don't know if he told me that night where I marked the "Asian girl" thing.

AD: Uh hmm.

2i But I think in my memory, I was trying to calculate back in time when that would be for myself.

AD: Okay.

2i So I think I... 'cause I kind of remember doing that, like going back. Like, when was that? Because that was the same time I saw him. Yeah. Oh yeah, yeah, yeah. He came over then to tell me what was going on and to make sure I wasn't going to say anything.

AD: What date was that?

2i The 11th of January.

AD: Was that the last time that he came over?

2i If I didn't mark it, it didn't happen.

AD: Okay.

2i But I took pretty good [unintelligible] of what was going on here.

AD: Did...

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i I'm not...I'm confused. Like, what am I not saying right that's confusing you?

AD: No, it...I'm...I'm only trying...so like at this point and time right here on the 7th...

2i I...

AD: I just see this right here where it says that "Chris was sent home early". Says "one month off equals two months". I'm mainly just asking from you and your words is, is that something that you learned that night or right before then?

2i I don't...I don't even know what that means.

AD: Okay.

2i That he got one month, equals two months. I don't remember what that even means for me at this moment.

AD: Okay.

2i I don't know what that means.

AD: Okay.

2i One month...I mean, I would assume I said he gets one month off, but equals two months. I don't know what that means.

AD: Okay. Do you...in looking at the calendar here also has like...so there was October, there's really nothing I could find to reference here.

2i Yeah, [unintelligible].

AD: And there's a couple of references here in November on the 30th and the 27th.

2i What does this say? "Came over, start work". Oh that's just when he goes back to work.

AD: Does that appear accurate that he came over in November?

2i Probably if I wrote it, uh hmm.

AD: Okay.

2i But I don't think that...It depends on where... "Last day of work". What did you ask me about this one?

AD: Well I was just asking, does that appear accurate that he...

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i Came over?

AD: Came over?

2i Yeah.

AD: Okay.

2i I would trust that I wrote that.

AD: Okay.

2i If he came over, he came over.

AD: And like in December, like the 19th?

2i "Chris came over." "Chris last day of work." Yes.

AD: Okay.

2i But on those times I don't remember..."Chris last [unintelligible]". See I didn't see him very much. He probably came over then. I do not know if anything happened then.

AD: Okay.

2i I kind of don't think so, because that was like...as you can see by the way my calendar goes it was kind of busy in the beginning...

AD: Right.

2i And then things just kind of fall...fall off.

AD: Like you said, like they just sort of fizzled out. [Unintelligible].

2i Yeah and it wasn't like...if you have my phone records, it wasn't like real like...obvi...well he's married, but it wasn't like, we we're like texting. I know I texted him, like have a Merry Christmas or something like that and how are your kids.

AD: 'Kay.

2i But...

AD: I...I'd asked you...in the last interview with you was if...in October was there like a definitive, like "hey it's over, we're done, we can't..." , was there ever anything like that?

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i There just wasn't. [Paper shuffling]. Sorry. Yeah, I don't rememb...there just wasn't any kind of...anything. I think, like I was trying to tell 2i this morning it's like during that time I had be out of this house and was like my money situation and I couldn't afford to live here. You know, and so it's like I was still in my divorce. You know, and so for me it wasn't like I was...I mean, he...maybe Chris was on my mind sometimes...

AD: Uh hmm.

2i Obviously, I liked him, but I think I had too much in my own life that was too stressful.

AD: Right.

2i You know, so I didn't...it wasn't like...Chris was not my, like supportive rock or anything like that.

AD: Okay.

2i I know I did ask him like legal questions [unintelligible]...

AD: And so these events that happened five years ago are...would you say they're tough for you to recall those dates and some of these entries?

2i Uh hmm. And if it's so sporadic, I know there was not any...we didn't ever talk and say "oh err, you know we're not gonna see each other", except in the end when he was obvious in...obviously into, you know trouble and then he was like scared to do anything more for a while, I guess. I don't know what the situation is.

AD: Okay. Okay.

2i But I'm sorry if I'm not like getting to the point you want me to make a point, I don't know.

AD: No, it's...the reason we're bringing this to you is to...just to see again, number one to verify that was this an accurate depiction of...of your calendar, were these your entries that you put in there? And then, you know like I say on the 7th here, there's this reference here, "Chris's last day at work".

2i Uh hmm.

AD: "Send home early" and then "one month, two months off".

2i Uh hmm.

AD: Merely just want to know if...if you recalled writing that and about when did you learn it or what did...what it mean to you? That's it.

2i I just assumed that he had time off while he was being investigated for whatever.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: Okay.

2i [Unintelligible]...the department put him...

AD: Okay.

2i He had to...he couldn't work anymore, he was on paid leave or whatever they do.

AD: Okay, but you're not sure if he told you that or...?

2i I don't know.

AD: Okay.

2i Maybe he told me that. "Chris sent home early." 'Cause I wouldn't learn that somewhere else. He must've told me that when...it's hard for me to think of when he told me something I don't even know what it means. Like, I don't...I can't pull up the connection.

AD: Right, it's almost there...there's...

2i Like I can't pull...

AD: There's sort of a reference...a key that we understand.

2i Yeah. I...

AD: What lingo and things like that that we understand that...or a process that maybe you not...

2i I don't...to me those...that means nothing to me.

AD: Okay, well and...

2i All it means to me is that he is now...that's his last day and he has a month or two months off.

JM: In looking at your calendar, looking at January 2016 and December...December 2015, you're sure...can you tell us for certain whether or not you spoke with him during those months and/or saw him?

2i If I saw him I would have wrote it.

JM: Okay.

2i I know that. I'm pretty sure I would have wrote it down, 'cause that seems to be my obvious pattern.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

JM: Okay.

AD: Okay.

2i But I don't know about talking...we didn't really talk on the phone very much. There might've been a few text later, in the later times, because I remember those were...and those were nothing. It was just like "Merry Christmas" something about...I think maybe there was something...some text about "oh the kids are...somebody is gonna be in middle school or something", 'cause both our kids...

AD: Both you guys have kids?

2i We have two kids that are the same age. My daughter...I have only a daughter and then I found out his son is the same age as my daughter.

AD: Okay, so those things in common, a lot things in common?

2i Yeah.

AD: Director MacConnell, did you have any other questions?

JM: No, that was it.

AD: Okay.

2i I feel bad. I feel like I'm not doing something right.

AD: No, it...we're not asking you to do any more than just tell us what you remember and that's it. I mean, we don't...we don't want to put words in your mouth and we don't want you to...to guess at anything. We want you to just be completely...you know, again remember only what you can remember.

2i Uh hmm.

AD: And that's it.

2i I know I wrote that, whatever that time thing is on there 'cause it's...I wrote it, it's me. "One month off, equals two months." I don't know what that means though.

AD: Okay.

2i I just...to me, right now what it means is he has...he had to go on time off.

AD: Okay and yeah, I mean if that's...if that's the best you got from memory. I totally understand [unintelligible] five years ago. I have a hard time remembering things from a week ago.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 11/12/2020 Time: 2:07 PM

Complainant: [REDACTED] 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

2i Me too and it's worse now with my age for real.

AD: Okay. I'm gonna go ahead and I'm gonna conclude the interview here and I'm gonna off recorder. The time is now 2:22 pm.

[End of Recording]

SPOKANE EXHIBIT 12

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/29/2020 Time: 5:00 PM

Complainant: [REDACTED] 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: Sergeant Art Dollard
MC: Lieutenant Matt Cowles
JM: Director Jacqui MacConnell
CC: Corporal Chris Conrath
KH: Officer Kris Honaker
DD: Detective Dave Dunkin
BL: Bart Logue

AD: So, we are now beginning this interview. The date is October 29th, 2020 and the time is now 1700 hours. Present in the room are Corporal Chris Conrath and his representatives from the Spokane Police Guild, Officer Kris Honaker and Detective Dave Dunkin. This interview is being conducted by Sergeant Art Dollard and Lieutenant Matt Cowles from Internal Affairs. And Spokane Police ombudsman Mr. Bart Logue is also participating. As well as Director Jacqui MacConnell is also present in the room. This interview is being recorded. Internal investigation files are considered public record and are subject to release in accordance with Washington State law. Corporal Conrath, do you have any concerns with the release of this investigation?

CC: Yes, I think this investigation seeks to obtain private, personal information about me that if released publically would have a detrimental effect on my personal life at home with my wife and children. That's all.

AD: Okay. Would you please confirm the spelling of your last name and tell me your personnel number?

CC: C-O-N-R-A-T-H; 1106.

AD: Have you read and signed your administrative rights and responsibilities form?

CC: Yes, I have.

AD: Do you understand those rights?

CC: Yes, I do.

AD: And have you been given a written overview of the allegations in this case?

CC: Yes.

AD: Okay. Do you understand that you are an accused officer in this?

CC: I do.

INTERVIEW TRANSCRIPTION

IA Case #: C20-074

Date: 10/29/2020 Time: 5:00 PM

Complainant: 2i

Complaint: Policy 1050.2 / Standard 4.9 / Policy 340.3.2 / Policy 340.3.5

AD: The IA tracking number is C20-074. The allegations are as listed: SPD Policy 1050.2, members of this department shall refrain from developing or maintaining personal relationships with victims, witnesses, or other individuals during the course of or as a direct result of any official contact; SPD Standard 4.9, members of the Spokane Police Department shall at all times conduct themselves in a manner which does not discredit the law enforcement profession or the Spokane Police Department; and SPD Policy 340.3.2, engaging in on duty sexual relations; as well as SPD Policy 340.3.5, failure to disclose material facts or making a false or misleading statements during the course of any work related investigation. These are all policies from the 2015 policy year. The complainant in this is 2i Corporal Conrath, how long have you worked for the Spokane Police Department?

CC: I've been with the Police Department since early 2008. I began as a Reserve Officer for about two years. I was hired full time in July of 2010.

AD: And prior to the Spokane Police Department, did you have any law enforcement experience?

CC: No, I did not.

AD: Do you currently have any specialty assignments?

CC: I'm a member of our Tactical Team, our CART Team, I'm a firearms instructor.

AD: And where are you currently assigned?

CC: Graveyard patrol, Team 14.

AD: And this allegation goes back to May of 2015. Do you recall what your assignment was at that time?

CC: I believe I was power shift south at that time.

AD: As I said, this investigation stems from a Malicious Mischief/DV call that you went on, on 5/27/2015. And as such, I'll for the record show you this was the call that you went to if you want to take a look at that. On 5/27, it was reported as a Malicious Mischief/Suspicious Circumstance. In looking at the CAD of that, it appears that there was no probable cause to make an arrest. Is that...is that correct?

CC: I would just add to that by...

AD: [Unintelligible].

CC: ...saying there was no actual allegation of a crime. Upon arrival, it was immediately determined that no crime had occurred and there was no damage to her property.

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AD: Specifically, if you can recall, what...what was it about?

CC: So, the caller stated that her sprinkler system was not functioning correctly and she believed that it may have been vandalized. So, I responded and I immediately determined that there was no damage to her property, it had not been vandalized, no crime had...had occurred. But rather, she was unaware that to activate her sprinkler system, she had to turn on the water. So, I...I assisted her in locating the water valve and activating the sprinkler system.

AD: Do you recall, did she say that there was a suspect involved in it? Did she say anybody for that matter?

CC: As I arrived, we were talking about the circumstances...

AD: Uh huh.

CC: ...as we walked back to the back yard to kind of find the sprinkler box where the issue may have been. She speculated that she had just been involved in an ugly divorce, so she listed off "...my ex-husband could've been involved, it could've been a neighbor kid. Although I get along pretty well with the neighbors, I have no idea who would've done this to me, but my ex-husband is pretty mad at me right now." And that conversation took a matter of moments as...as we arrived at the...the problem area, the sprinkler box that's in the ground. It was obvious that no one had damaged it, so those...I guess that [unintelligible]...that belief was dispelled pretty quickly.

AD: Did you complete a police report that night reference this?

CC: I don't believe so. I cleared it one David (1D).

AD: Okay. The complainant on this is a [REDACTED] 2i Does that name sound familiar to you?

CC: Yes, it does.

AD: Okay. I'm just going to show you a picture, it's a SPRS picture. That's the only one I could find of her. Does that look familiar to you?

CC: That is her.

AD: Okay. Did you know [REDACTED] 2i prior to this call?

CC: I did not.

AD: Okay. That night, do you recall running her name, or doing an NCIC check for warrants, local history, anything like that?

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CC: I don't recall doing that. That's not to say that I didn't. Typically, Radio will do that for me. I mean I can review the CAD here, but it...it looks like prior to my being dispatched it said that 10a so it says right there.

AD: Okay. Anything else on this thing that brings back any memory of that call?

CC: May I review it again?

AD: Yeah, please.

CC: No.

AD: Okay. Aside from this call, did you [unintelligible]...respond to any other calls for service at this 2i or any calls referring to 2i?

CC: I do not believe so.

AD: Following that date.

CC: No.

AD: Okay. So, this last month her husband came to us and this is what the complaint started with. With information that indicates that there was a relationship that transpired between you and 2i After that initial call, did you reach out to her or was it the other way around?

CC: Can I just clarify?

AD: Yeah.

CC: Okay.

AD: Please.

CC: So, in looking at her sprinkler system, we determined that there was no damage, but there...that she needed to turn the water on. So, we did that and then I stayed there while we tested the sprinkler system. Like she turned it on and we watched all the various stations go. One of them had a problem where there was a valve that wasn't working correctly, like the station didn't quite spray the water the way it was supposed to. So, it appeared as though it may have been damaged during the winter or something to that effect. And so, we discussed how to go about getting it fixed. She didn't have any ideas. I offered to, on my days off, come back and help her with fixing that sprinkler system. And I did that.

AD: So, at that...at this call, did you give her your phone number or did she give you her phone number? Do you recall how that was?

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CC: I don't recall if we exchanged numbers, or if I just offered to come back at a certain time. I don't...I don't remember. This was over five years ago.

AD: Yeah. Do you remember how...how long after that that you went back?

CC: I can only assume it was my next weekend, so it was a matter of three to five days, something in that...in that realm, but I don't recall exactly.

AD: And was that on duty or off duty?

CC: Off duty.

AD: Off duty. What do you remember about that time that you went back?

CC: I went there for the purpose of helping this citizen repair her sprinkler system as something that I...the type of thing that I do on a regular basis for my friends and neighbors. I did that. I got down into the backyard and in the dirt, and helped her fix...get the sprinkler system going and so, I spent some time there. And during that time, we developed a bit of a friendship, which continued on for a period of time. And in the coming weeks and months, it had developed into a more private, intimate relationship.

AD: Okay. This...this going back to help her, is that something you do for...for a number of people when you go to these calls? I mean will you, and especially, I mean I'll...I'll narrow it down to...to...to women. Do you go and help either victims or witnesses, you know, suspects, people that you come in contact with in the course of your duty?

CC: No, I do not.

AD: So, are you saying that she is just a kind of an outlier? Like a one-time thing?

CC: Yes, I am saying that.

AD: Okay. Did you share any email addresses with her?

CC: I don't recall sharing an email address with her.

AD: Do you recall her emailing you anything?

CC: I don't recall sharing emails with her at all.

AD: And again, just for the record, did you email her anything?

KH: I...I'm...

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??: [Unintelligible].

KH: ...I'm sorry.

AD: I'm sorry. And I'll clarify...

KH: Haven't we asked that three different ways?

CC: If I clarify, I don't remember having sent her emails or received emails from her.

AD: Okay. I...

CC: Through my department email or otherwise. I...that's...I can't say with 100% certainty that I...again, this was over five years ago, and I...I don't recall having an email exchange with her.

AD: Okay. After you worked on that...or say the day that you worked on the sprinklers, you said you struck up a friendship with her the day that you were doing the sprinklers with her.

CC: Correct.

AD: Okay. Can you describe further, how did...did that friendship evolve that day into things like...like a hug, a kiss, anything like that, that day?

CC: No, that day I would say it probably ended with a handshake and a thank you.

AD: Okay. Shortly after that, and you know, if we're going to refer to some of this stuff, let's refer to the calendar here. So, apparently, [REDACTED] 2i kept a calendar, like a diary, of her interactions with you. And what I did here is I highlighted the areas where your name comes up. This first one's a little bit hard to read, but it says "Policeman came over." And that was on the 27th, which is the same date as this call right here. "Texted any luck with your sprinklers," okay. It may be hard for you to recall, but do you...was there...does that sound accurate like there was something in I guess a text...

CC: So, okay, that...that could've been. It might've been a situation where I offered to come back and help if she needed it. In the meantime she was going to pursue looking for a company to come and help her with it.

AD: Okay.

CC: That...that makes sense to me.

AD: Okay. And the moving forward here, on it looks like Saturday, the 30th, "Chris to fix sprinklers." Does that sound about accurate?

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CC: I would say that's accurate.

AD: Okay. After that date, what kind of contact did you guys have? What was the next one? Do you recall?

CC: I...I don't recall the next contact.

AD: Okay. Did you invite her to go out and shoot at the academy with you?

CC: I know that at one point I did. I don't remember the chronological sequence. Contacts I did have with her where I don't recall the specific dates and times was she did a civilian ride along with me at some point and we did go to the range, I'm guessing one time.

AD: Okay. Did you let her shoot guns? I mean is that...

CC: Yeah.

AD: ...that's the...

CC: Yeah.

AD: ...purpose of going out there.

CC: Sure.

AD: Okay.

CC: I mean we got to talking about what I do for a living and she expressed an interest in learning, and so, that came up in the conversation and I offered that.

AD: Okay. Again, just refer to the calendar here. This is in June of 2015 on the 20...or sorry, 11th. It says, "Shooting – first lesson – Chris." Does that appear to be accurate?

CC: I'm sorry, can I have a...

AD: Go ahead.

CC: ...closer look?

AD: Yeah, please.

CC: I don't...I don't know what this is.

KH: It's June 2015.

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CC: Okay. I would say that might be accurate. We did go to the range together.

AD: Do you recall, was that...was that on duty? Off duty? Do you remember?

CC: It was off duty.

AD: 'Kay.

KH: Sergeant Dollard, just a question here.

AD: Sir,

KH: On it looks like the 1st and the 2nd of June, I'm not sure which day she's counting, or referring to, but I'm...I'm going to allege that...excuse me for a second. If Chris fix sprinkler, I'm not sure what it says in front of fix.

AD: Chris to fix.

KH: To fix sprinkler, might've been an agreement for that to happen 'cause it looks like she's either indicating on the first or second that that got done. Is that what you're reading?

AD: Well, I guess then is that question to you. Does it seem more likely, and I...I recognize the fact that we're dealing with something that happened five years ago. Does it seem like it was more likely instead of it being on Saturday, was it a Monday or a Tuesday?

CC: I...I couldn't say. I would...I would bet that it was on my days off.

AD: Okay.

CC: But anywhere within that period of time, I...I can't say for certain.

AD: Okay and it looks like June 1st, on...according to Telestaff, was a regular day off and it looks like...so the...it just says June 1st was a regular day off for you. And May 30th was also a regular day off as well.

CC: Okay and I...I mean she has labeled three days for Chris to fix sprinklers. I...it wasn't a three day process.

AD: Okay.

CC: I went up there and worked on it. I don't recall which day...

AD: Okay.

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CC: ...exactly it was.

AD: Okay. Relatively accurate in that time frame, maybe not exactly the date?

CC: That makes sense. I offered to come back and help her with the sprinklers if she was unable to like get it figured out on her own through a sprinkler company or something like that.

AD: Certainly. Okay. And I'll just take that...

CC: Okay.

AD: ...back from you for just a second. And then...and then she...it looks like...you mentioned a ride along. It looks like she went and did a ride along with you later that month. And we actually have the form from back then. Does that appear...

CC: June 26th...

AD: ...accurate?

CC: ...of 2015 and that is my signature.

AD: Okay. So, this relationship is progressing with a...a take her out to the range, you guys go shoot together, and then she goes on a ride along. At...at any point, even in this ride along, had you ever ran her name again in another time? Did you know anything about her history or anything like that?

CC: I...I don't remember doing such a thing.

AD: Okay.

CC: I don't know that I would've had a reason to. I mean sometimes when a person is riding with you, they may have questions about how our system works and things like that, so it's...there's been times when I may have run a person's name during that time. So, if it was on that day, maybe that might've been why would've run her name. I'm assuming you're going somewhere with...

AD: Well...

CC: ...having run her name.

AD: ...yeah. Well, let me ask you this. In the course of this relationship that you guys spurred over the course of months, did she ever tell you that she was out on pre-trial release for a DUI?

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CC: Well, I...I don't remember that...her saying that...

AD: Uh huh.

CC: ...to me. If she did, I don't think I took much note of it.

AD: Did she tell you that she had got a DUI earlier that year?

CC: I don't remember her talking about a criminal past.

AD: Okay. Did she ever tell you that she'd been involuntarily committed on two different occasions?

CC: No.

AD: Okay. So, how soon after you did this sprinkler fix and then you know, again and we're talking probably in June here, did you go and you stay the night at her house? On [REDACTED] 2i

CC: I can't say for certain when I may have done such a thing. At that time I was working night shift and so, when I would meet her privately, it would be after my shift was over, probably in the realm of 4:00 in the morning type of thing, so when you say spent the night, I...it might've been at night, but I don't think I actually spent the night.

AD: So, you don't think you ever stayed the night while you were...while you were off?

CC: I'm not saying that I didn't, but I don't remember having done that. And I can't say for certain what date...dates and times that I saw her. I saw this woman multiple times over the course of three or four months. So, I do not recall specific dates and times that I saw her.

AD: Okay.

CC: If that makes sense.

AD: Just...just note here that like in Telestaff, you had a switch day off on June 6th and she puts down here "Chris stayed night."

CC: So, I took the night off and I went to go see her. That's what it looks like.

AD: So, and...and again, just to clarify, that she is...her verbiage for stayed the night is just that you went over to see her?

CC: I can't really testify as to what she means by what she wrote on her calendar, but it looks like I was off shift and I saw her. That's what...that's what her calendar reads, but I don't recall specific dates and times.

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KH: Actually, Chris what we're asking, just to make sure we're all on the same point here. Do you recall spending the night, so going there...

AD: Sleeping.

KH: ...whatever you're doing, sleeping, and then waking up and...did that occur?

CC: It's entirely likely. Yes.

AD: How many times...how many times did you go there at the end of your shift and you know, stay there for again, as we're...as we're speaking about this, maybe fall asleep or things to that nature. How many times did you go there after work would you say?

CC: It would be difficult for me to estimate a number of times, but over the course of three to four months, maybe once every other week or slightly more frequently than that.

AD: At one point she moved to another location. Do you remember what that location was?

CC: No, it was deep South Hill somewhere off of South Freya.

AD: Was it a house or apartment?

CC: It was an apartment building.

AD: Apartment building. Even remotely, do you remember the apartment number at all?

CC: No.

AD: Okay. Really bluntly, cut to the chase, did you have sex with her?

CC: Yes, I did.

AD: Okay. And we're talking intercourse, oral sex, both?

CC: Yes.

AD: Okay. Was that on every one of the nights that you went over there after work?

CC: I wouldn't say that it was on every one of the nights, but most of them.

AD: Okay. If you could estimate or give a number, how many times? I know it's personal, but...

CC: I think my estimation of before of as between once a week to once every other week is...is my...my best estimate at this time.

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AD: Okay. And you know, just to show you here, because it looks like it coincides with what you're telling me is that there were times that you went over. "Chris came over after work" again in this month. When we turn over here to July, it shows these two nights, 2nd and 3rd, "Chris stayed night," "Chris stayed night." And when I look at Telestaff, I mean they were both...so, 2nd/3rd they were both power shift that you worked power shift. Would it be accurate to say that they were...you went over there after work and stayed for a period of time, both nights?

CC: That is something that I did regularly, so...

AD: Okay.

CC: ...I'm not...I'm not disputing that, but I can't say that that's exactly what happened on those days. I...someone wrote on this calendar and documented these things, that I can't say with specificity as to whether those specific things happened on those specific days.

AD: Okay.

CC: But that is something that I did on a regular basis for those three to four months.

AD: Okay. Did...did you share with her your work schedule?

CC: I'm sure I did.

AD: Okay.

CC: She knew what days I was working and what days I was not working.

AD: And...and for what purpose would you share a work schedule with her?

CC: I think it came up in conversation. It's pretty easy to plot out an entire year worth of work shifts...

AD: Right.

CC: ...based off just the knowing how...how it works.

AD: Okay.

CC: The rotation.

AD: 'Cause yeah, she puts in here, you know, on several occasions you know, "Chris work," "Chris off," "Chris' last day work." She puts in things like that. During this time, do you recall texting back and forth with her, phone calls, things of that nature?

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CC: Sure, I communicated with her.

AD: Okay and I mean she wrote in some things like, [unintelligible] "Chris texts he misses me a lot."
Did you ever stop by during work hours, while on duty, in uniform, driving a Spokane Police car?

CC: I probably saw her at some point in time while I was working, but I will clarify that there was no inappropriate conduct during those times. I might be talking about a brief coffee break, or saying hello during my lunch hour, or something like that. I...there was no sexual interaction while I was on duty.

AD: Do you remember being on duty going to the [REDACTED] 2i address as well as to the apartments that she lived in?

CC: I don't remember going to the [REDACTED] 2i apartments. That's not to say that I didn't, but my understanding at that time was that she was in the process of moving out. And I think she only lived there for a very brief period of time after I came to know her and then she moved into the apartments. I have no idea how long that was.

AD: Let me just clarify this. So, you did at some point, whether it was off duty or on duty, you did go to the apartments that she lived at? And they were...they were the Ashton Apartments...

CC: Oh...

AD: ...is where they were.

CC: Yes, I did go...I did see her at her apartments. That was where I saw her the majority of the time I did see her.

AD: Okay. And...and did you stop by there while on duty?

CC: I don't recall a specific example, but...but yes, I think I probably did stop by to say hello while on a break or something like that. But if I did, it was brief.

AD: You worked power shift hours. When would roughly you take a break, if you were going to take one?

CC: I think we took lunch break at like 9:00 PM.

AD: Alright.

CC: Ish. If we get...if we get a lunch break. I think it was just situationally dependent. If I took a call up on the South Hill and it was slow, that might be an opportunity to say hello, but again, I don't remember with much specificity.

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- AD: Alright. Does...does it sound accurate in the timeframe here, did she move into those apartments in June or July?
- CC: I could not say when she moved. I...
- AD: Okay.
- CC: I thought it was very early on within that period of time that she moved into the apartments, but I have no idea.
- AD: Okay. So, what you're telling us though, at any...at no time did you go there on duty and engage in any sexual act?
- CC: That is correct. 100%.
- AD: Okay. So...
- KH: I'm sorry, just to make sure I heard the question right. That was at no time when on duty...
- AD: Yeah.
- KH: ...sexual contact?
- AD: Yeah, let me [unintelligible]...yeah, at any time...
- CC: Did I miss that question? I...
- AD: No, I...I may have used like two negatives. At any time when you visited her while on duty at the Ashton Apartments, did you engage in any sort of sexual activity?
- CC: Absolutely not.
- AD: So, if she were to say that you arrived there...
- DD: I think he's answered it two times very definitively.
- AD: 'Kay. If...if she were to say that you went there while on duty and she gave you oral sex, she would be lying?
- CC: Correct.
- AD: Okay. Did [unintelligible]...did [REDACTED] 2i know anything about the...the maybe problems that were going on at home? Whether it was with something about your wife having cancer at the time, did she know about that?

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CC: I think so.

AD: Okay. Because she does put things in here, things like "Chris called" and the words "tumor." I don't know specifically what that means. Do you know what that means?

CC: Yeah, I do.

AD: Can you tell...tell us what that means.

CC: My wife contracted stage 4 cancer in her brain at about that time in mid-July.

AD: Okay. I'm going to fast forward here. On September 8th here, she writes, "Have Chris come over; Chris came over" and then she writes "Asian girl." Do you know what that's in reference to?

CC: May I see that?

AD: Yep. Certainly.

CC: I'm assuming that that is a reference to an Internal Affairs investigation that I was the subject of in the fall of 2015.

AD: Correct. And that investigation stemmed from a call that you went on September 7th of 2015. Did you...did you relate that to her that the following day you had met this girl, who she's referring to as Asian girl?

CC: I don't remember having that conversation with her. That could be. I mean that...I guess I'm confused. I don't remember having...

KH: Just a second.

CC: Okay.

KH: Just for the record here, this is really difficult to tell this is written by the same person. This is like a different font if you look at this writing, Asian girl vs. have Chris come over, Chris came over. That is interesting to me. We have no way of validating what's on here, but that looks different. I don't know what you think, but I think it looks different to me.

AD: And...and I'm merely...it could be different, and...

CC: Can I ask a question? Where did this calendar come from?

AD: This calendar came from her husband.

CC: Okay.

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AD: It came from 2i

CC: Okay.

AD: So, she has also acknowledged that there is a calendar as well and that she wrote all this stuff down on a calendar.

CC: And she acknowledges that she wrote all of those...

AD: She [unintelligible]...

CC: ...entries there?

AD: She acknowledges that she wrote entries down on a calendar.

CC: Okay.

AD: So, I don't know if she's the one that wrote everything on this calendar. That's why I'm asking you if they're...if these seem to be accurate according to your memory.

CC: I did eventually have conversation with 2i about these other circumstances. It doesn't make sense to me that I would've been conversating with her at that point in time.

AD: Okay. But you did tell her about this other investigation you were involved in?

CC: Ultimately I did. I don't think it would've been like the first week of September.

AD: Okay. Because then as it goes, there were...

KH: The date on that, Art, again is what?

AD: The date...

CC: Seventh.

AD: ...is September 8th was the date that the term "Asian girl" has been put in here.

KH: Okay.

AD: And the investigation...

DD: In different handwriting?

KH: Yes.

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AD: ...that was...

DD: Okay.

AD: ...well, I don't think you're a handwriting analyst either.

KH: No, it...

AD: And neither am I.

KH: ...it does...it does look different.

AD: So...

KH: She is...she's confirmed that, that she wrote that, Art?

AD: No, I...I don't know if she's done it or not. We're going to have to ask her that.

KH: Okay.

AD: Okay. So...

KH: It's just interesting in where it is in the timeline of the other investigation. It doesn't make a lot of sense. Sorry, go ahead.

AD: So, they...just for the record, the other investigation proceeded September 7th of 2015. That was when you contacted a female...female by the name of [REDACTED] 2q and then shortly after that, her boyfriend made some calls, and that started that investigation. Okay.

CC: I'm sorry, was that...I'm sorry, was that a question?

AD: I'm just saying that that's what that was about, was the Asian girl thing was about, or I'm sorry...

DD: How would he know what it's about?

AD: What I'm saying is, is that the investigation I'm asking you about, if you told her was in reference to the [REDACTED] 2q investigation that was going on at the same time.

CC: And I will say that yes, I did converse with [REDACTED] 2i about the other investigation at some point in time. I do not think that I was speaking with her about it in...on...on September 8th.

AD: Okay.

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CC: It looks to me as though someone is going back and making notations on a calendar about things that may or may not have occurred, but that was not accurate in the timeline of events.

AD: Okay.

CC: If that...if that makes sense.

AD: And that does. And in fact, and that is something to...to fish out in this. Were there some references made on this calendar, absolutely. Did you ever have a conversation with 2i asking her whether or not she was going to report this...this relationship you were having?

CC: No, I don't believe I did.

AD: Did you ever tell her don't tell anybody?

CC: I don't remember specifically saying that; however, although she was divorced at the time, I was still married. I was having an extramarital affair with another woman. So, I think it was well known between the two of us that I didn't want that to be public information. I was keeping secrets from my wife at that time.

AD: Were you ever concerned that SPD, the Spokane Police Department, would learn about this relationship you were having with her?

CC: I don't remember being specifically concerned about that. I guess it's an admission of my own ignorance perhaps, but I...I didn't see this as a...at that time, as a...as a violation of policy. I thought I was engaging in a off duty, personal relationship that should not have been of concern to the Police Department at that time. I was later involved in an Internal Affairs investigation for something that I think is significantly different, but comparable, and that was the period of time at which I remember breaking things off with 2i

AD: When did you break up this...this relationship with 2i?

CC: I know I'm prefacing every answer with I don't recall specifically 'cause it was five years ago, but I don't remember the exact date and time. The way I remember this in my own mind was like I said I was...I was naïve and I was engaging in stupid behaviors that I thought I was only making a mistake in my personal life. At the point that I was advised that there was a pending Internal Affairs investigation for this other incident, it was a bit of a defining moment in my life where I knew that I didn't want to be engaging in that sort of activity any longer at a minimum. And it was at that point that I spoke with her and ended things. So, it was at about that same period of time, whenever that was.

AD: Okay. Do you recall the date of October 6th, 2015? That was the date that you had an IA interview with then Sergeant Staben regarding this other investigation.

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CC: Yes, I remember that interview.

AD: Okay. Does that help...help you in your recollection of a time frame saying that you were weren't having any more conversation or anything with her?

CC: I...I...in my memory, it was somewhere around that exact period of time when I came to the realization that this was a problem for me and that I broke things off with [REDACTED] 2i So, yes, I would say it was in very close time frame to that October 6th date that I ended things with her.

AD: Can you...can you describe further what do you mean by broke off contact? What...what does that mean?

CC: I had a conversation with her and...about how I'm sure I mentioned these other things that were going on and that it was time for us to end our relationship.

AD: So, after...on or about October 6th, you no longer called her? Is that correct?

CC: I don't remember having any communication with her after that time. That's not to say...there...there may not have been a phone conversation or something like that. I don't want to say with 100% certainty that I never talked to her after that time, but I don't believe I did. I...I...I very specifically and intentionally ended that relationship at that period of time.

AD: And for the record, did you ever go over and visit her after on or about October 6th?

CC: I do not think that I did. I know that in ending a relationship like that, there's a certain element of apology that has to take place. Obviously, I was sorry to her for having to end things that abruptly. So, I may have spoken with her about it shortly thereafter, but I...as far as the relationship itself, it was ended at that time.

AD: So, you didn't continue to have sex with her when you visited her after that date?

CC: Correct.

AD: You mentioned earlier that you thought the relationship that you had with [REDACTED] 2i was much different than you had with [REDACTED] 2q the female in the other relationship. Can you tell me how is this one different from that one?

CC: In the second incident, [REDACTED] 2q was...was technically listed as the victim...having been the victim of a crime. [REDACTED] 2i was not. In fact, there was really no crime that occurred, no...I didn't feel it could be argued that there was a conflict of interest on my part. I didn't feel like it was affecting my...my performance or effectiveness as a police officer. I...I freely acknowledged that the second case was blatantly wrong, though I didn't necessarily realize it at the time. I was educated during that Internal Affairs interview and...and the disciplinary process that followed. [REDACTED] 2i was not the victim of a crime. She was not involved in a domestic dispute. She was a

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person that I did meet while on duty and though it was not my intent at that time, I did develop a personal relationship with her to involve physical intimacy. And that did happen, but at that time, I thought it was very different than the second case for those reasons.

AD: So, do I hear you correctly that both of them there was physical intimacy, both of them you met on a call. Is that...are those two things correct; both that there were physical intimacy?

CC: That is correct.

AD: Both you met on a call? Is that correct?

CC: Correct.

AD: 'Kay. Both were involved in some sort of a maybe a DV or domestic type of dispute?

CC: Well, and I...and I...I wouldn't say that I agree with that because in [REDACTED] 2i case, there was no domestic dispute. She had been involved in a divorce. She has personal relationships, but at this...at the time of this incident, there was no...like the male half was not involved, other than a casual mention.

AD: Okay. And just again, why I bring that up is she says [unintelligible]...in the original call, comp going through nasty divorce with [REDACTED] 2i assumed to be [REDACTED] 2i Okay. So, in both cases, there is a mention of dispute of some sort and there is...

KH: Art...

AD: ...[unintelligible].

KH: ...I'm going to object.

AD: Hold on a...

KH: He has actually...

AD: Hold on.

KH: ...answered your question at least...

AD: I...

KH: ...once.

AD: ...I'm trying to find out where he says that there is a difference between the two. And he says the difference is that one has a suspect, one doesn't.

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KH: No, that's not what he said. He...yeah, one had an allegation of a crime, dealt with it. That's...I'm sorry, I don't know the lady's name. This one reports a crime, or thinks that she does, and has turned out it's not a crime. There's actually nothing to it. That is a difference and I think he's explained that, and if we want to keep going over that ground, it's seems like it's asked and answered in looking for a different answer that's more acceptable to you.

AD: No, I'm not looking for an answer that's more acceptable. I'm just looking for what it...what is the...I mean they're both intimate relationships. They're both people that he met while on duty in uniform responding to a call, and I'm trying to find out the difference is...

KH: I...

CC: Can I elaborate?

KH: ...he...he said it was...the difference is this woman here is not a victim...

AD: Okay.

KH: ...of a crime. And he said it.

AD: On October 6th, during the interview that you had with then Sergeant Staben, let me get this for you here. You make this statement at the end here. It says, "All I would add is that I freely recognize that this was my wrongdoing and I made a big mistake, and I take responsibility for it. This kind of thing would never happen to me again." Do you recall making that statement?

CC: Yes, I do.

AD: Okay. Can you tell me what did that...what did you mean when you said that?

CC: I meant that I understand what this is about, I understand what happened, I understand that what I did was wrong, and I have already paid dearly for that mistake that I made. And I will not find myself in that situation again, meaning I will not do this again.

AD: At that time, on October 6th, were you still engaged in a relationship with 2i ?

CC: No, I was not.

AD: So, you broke off the relationship before it? Is that what you're saying?

CC: I'm saying that when I was advised of the pending Internal Affairs situation, the problem...the problem that I was dealing with here, during this interview, that was the point at which I made the decision to terminate my relationship with 2i Yes.

AD: Do you...

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CC: And our relationship did not continue past that time.

AD: Do you remember how much before then?

CC: Like I said, I do not remember. Probably somewhere between the time when I was made aware of the Internal Affairs investigation and this interview.

AD: At that time, you did...did you tell anybody ever, I'm talking even friends at work, or coworkers, supervisors, anybody...did you tell them that you were having a relationship with [REDACTED] 2i

CC: I don't believe that I did. I don't know why I would've told anyone about that. Excuse me, you mean at that time?

AD: Uh huh.

CC: Yeah.

AD: Yeah.

CC: No.

AD: Anytime during the relationship did you tell anybody?

CC: No.

AD: Have you had any other relationships of a sexual nature or more than friends with any victims, witnesses, suspects, anybody that you've initiated while on duty?

CC: Absolutely not. Like I said in 2015, I suffered a great deal and never would I do that again.

AD: Do you think that the relationship that you had with [REDACTED] 2i at any time during that relationship if a member of the Spokane Police Department, whether it be your coworkers or supervisors, if they found out about it, do you think that it would reflect poorly upon you or the department?

CC: Well, it absolutely reflects...reflects poorly on me and my fitness to be a husband to my wife. I'm...I'm ashamed of this. Now if you're asking if I would be judged by my coworkers, perhaps. I can't say.

AD: So, meeting somebody while on duty and then engaging in a relationship, that would not be in your...in your view...

DD: Are we changing the question now?

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CC: I'm sorry, I didn't...that's not what I said.

AD: Okay.

CC: I said I can't testify as to what some other officer might think of what I had done.

KH: I think part of your question has been asked before and he's answered, and...

DD: And part...

KH: ...in fact he did not...

DD: ...of your question is also a false assumption.

KH: Yeah, he didn't realize he was violating policy until he got to this interview, which made him aware of all...he...he knew he was committing an adulterous act, we have that, 'kay, but that's not a policy violation. He learned of all that, so I don't know how he could speak to it until after that interview.

AD: Well, he...he engaged in a relationship which is the basis for the policy violation. He engaged in a relationship with a witness, a victim or a witness of [unintelligible]...

KH: I understand, but he didn't understand then. You asked it earlier and he answered it, that he didn't understand what policy violations were involved until this interview. Until he was made aware. He thought he was purely, and correct me here we're not going wrong, Chris, you thought you were [unintelligible] breaking your marriage vows?

CC: That's...that's what I said, yes.

DD: Do I have this straight now that cheating on your wife is a policy violation?

KH: No, it's not.

DD: Okay, 'cause we've got some serious problems with this department then.

AD: So, after October 6th, there's some calendar entries here where here on November 30th, "Chris came over." Does that appear to be accurate?

CC: No. May I see that again?

AD: Certainly.

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- KH: Why wouldn't...there's some just interesting things that I'll note here. Chris is in a different, if you will, font and circled for some reason, which I'm not sure why you would do that if it's the same comment. I think you're going to need to reach out to her to verify these things 'cause I have a lot of questions about them.
- CC: I mean there's another entry that says "Chris came over" in December. I was not seeing her at that time. Do you mind if I just look at this?
- AD: Certainly.
- CC: Yeah.
- KH: Who's circling everything here? These aren't your circles, right?
- AD: They are not my circles.
- KH: [Unintelligible].
- AD: Those are my highlights.
- KH: Right, no, I understand that. I'm just trying to understand the circling of some parts that seem to deal with the same person. It doesn't...I guess everyone has their own mental record keeping.
- CC: Okay, so January's the last page.
- AD: So, let me go back to asking this again. For the month...you said that this was not accurate in November. In December, where it says "Chris came over" on the 19th, is that...is that accurate or inaccurate?
- CC: I'm sorry, what month are we in?
- AD: We're in December of 2015 on the 19th it says "Chris came over."
- CC: I don't think that's accurate.
- AD: Okay. On January of 2016, "talked to Chris on phone" on the 14th of January. Does that look accurate or inaccurate?
- CC: I don't believe I was having any contact with her during that time.
- AD: Okay. On the 30th...or I'm sorry, the 11th of January, it says "Chris came over." Is that again, is that accurate or inaccurate?
- CC: That's inaccurate.

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AD: Okay, so prior to the...prior to October, or when about you were notified that this other investigation was going on, the...a lot of the other entries, are they relatively accurate or inaccurate?

CC: You're asking me prior to October?

AD: Prior to October.

CC: I would say that they are consistent with my memory, yes.

AD: I think it's a good time to take a break. I'll have no further questions at this point in time. Lieutenant Cowles will have some questions for you. So, let's take a 10 minute break.

KH: Uh huh.

AD: Is that good enough for you guys?

KH: Uh huh. Yeah.

AD: Okay. I'm going to go ahead and stop the recorder, and...

[Interview Break]

AD: 'Kay we are back on the record reference case C20-074. Lieutenant Cowles, do you have any questions?

MC: I do. And Chris, I just have a few, so to be respectful of your time. Since you ended the relationship, and any time up to now, have you had any indication from [REDACTED] 2i that she held any grudges towards you?

CC: None at all.

MC: Have you had any contact with her in the last month?

CC: I have not.

MC: Prior to the notice that Sergeant Dollard sent you for the interview, did you have any indication that there was a complaint or that this was...something from your past was coming back up?

CC: I didn't have any information that there was a complaint, but I believe it was [REDACTED] 2i took it upon himself to contact my wife directly at work.

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MC: Okay. When that came up and when you had the subsequent discussion with your wife I'm sure, did you consider just coming forward and I guess proverbially falling on your sword and divulging to the department what had happened?

CC: Well, no, I did not.

MC: Can I ask why?

CC: I looked at this as an incident that occurred five plus years ago, which preceded an incident I was involved in where I received a significant discipline and I corrected those behaviors. And I've made huge strides in my life since that time, both personally and professionally. When at that time my marriage was falling apart, I've...I've repaired it. I haven't had any hiccups at work since that time and I, like I said before, I thought in my mind that this was...this incident was in a different category. I perceived no conflict of interest between you know, myself and [REDACTED] 2i and I looked at this as just an ex-husband who had an axe to grind and was trying to notify my wife to hurt me.

MC: I want to look at the CAD here. And I see the initial call type is a Malicious Mischief. And in the notes that whoever I would assume is the 911 operator wrote DV Malicious Mischief. At the end there are some comments made by you discussing the call. You should read those. Would it show, and this is just a question, would it show if you made a request to Dispatch to change the call type? From like Domestic Violence/MalMis to just MalMis or...

CC: I...

MC: ...civil.

CC: Well, so, what I...what I do know about our...our system at that time was that you can change the...you could change the call type over the air, in which case I don't know how long they maintain recordings from, but you could also do it yourself. You could manually adjust a call type whereas now you cannot in our new system.

MC: Do you think that's something you might've done in this call?

CC: And I don't know...see I don't know how to read all this code. I don't know if it's telling me that I changed it, or if Radio changed it for me. Either way, it would've been my decision to change the call type. I mean it'd be a...

MC: And I don't know either way. I'm just curious.

CC: Well, through Radio or having done it myself at the time that you clear with a disposition, it was my decision to call it a Suspicious Circumstance rather than a MalMis.

MC: Okay.

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CC: Because I had no crime.

KH: I can answer all of this 'cause I can read that CAD. Yeah, Chris when he cleared, changed the call type. It's pretty clear on there.

MC: Alright.

DD: And because there was no DV aspect to this at all, was it appropriate to change it from a DV to just a MalMIs?

CC: Well, I changed it from a MalMIs to a Suspicious Circumstance, so...

DD: 'Cause it wasn't even a MalMIs.

CC: Really at no point was it a DV because the male half was not involved.

MC: Okay. I'm just curious. I just wanted to clear that up for my...would you have any comment to add if, during Internal Affairs' investigation, we had a conversation with [REDACTED] 2i that she did confirm maybe not specifically the Asian comment here, but that she did confirm that she was keeping record on her calendar and that she said that your relationship continued until it fizzled out in January?

CC: Excuse me, the question...

MC: Alright, so...

CC: ...exactly?

MC: ...would you have any comment if you heard, and I'm telling you, that during a conversation with [REDACTED] 2i she told Internal Affairs investigators that your relationship, including sexual contact, continued until January?

CC: I would dispute that. That my sexual relationship with her did not continue until January.

MC: Alright, I don't have any more questions.

AD: Mr. Logue, do you have any questions?

BL: Corporal Conrath had...has answered everything I had. Thank you.

AD: Officer Honaker.

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KH: I've got a few. One, I wanted to confirm with you on a statement you made early...earlier in the investigation. All policies that you have listed are from 2015. My question for you because I have seen the instigation from 2015, where the policy under 1050.2 (D) was actually within Nepotism at that time. Are you sure about that? Are you sure that this...

AD: Let me take a look here.

KH: ...was the way that was in 2015? Because what it shows in the ARP is that it was under the heading of Nepotism.

AD: So, the policy is Nepotism and Conflicting Relationships...

KH: That is...

AD: ...Policy 1050.

KH: ...what 1050 is?

AD: It is.

KH: Okay, alright. Fair enough.

AD: It is.

KH: And then I just wanted to make sure, she acknowledged...you made a statement there that she acknowledged she made entries on the calendar, but you didn't go through every one that you have highlighted with her?

AD: We have not gone through the calendar specifically with her yet.

KH: Okay, so this is not a...and we need to be real careful here, okay.

AD: Absolutely.

KH: This not an investigative trick that we're playing right now. You have talked to her?

AD: We...we have talked to her; however, what we were trying to do is we're trying not to divulge where we got the information from with her initially because her husband didn't want that to come forth.

KH: Okay, I'm sorry, we're putting our guy out there under quite a bit...I don't care about her stuff...

AD: No, I...

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KH: ...because he is on...on a significant thing with his work right now and his wife, for as...far as that goes. So, what we're going to ask you to do is do a proper fricking investigation.

AD: And...and we can go back. We could've interviewed Chris first before we interviewed her. We can interview anybody in any order we want. And we...

KH: Got that.

AD: ...can go back and we can interview her as well.

KH: I think...

AD: Again.

KH: ...we have a...a lot of problems.

DD: Well, these entries were framed as if the entries on the calendar are factual and confirmed when we know that they're not.

MC: Alright, so we're not going to debate the investigation right now.

AD: Hold on. Can I...can I answer to that real quick? That's why I asked...and I asked Corporal Conrath is that accurate or inaccurate. I didn't say that these are all accurate. I did not say that. I said...I asked him are they accurate or inaccurate.

DD: Okay, well...

AD: 'Kay.

DD: ...this'll get transcribed. We can go back through.

AD: 'Kay. 'Cause I didn't try to frame this as these are all the truth. I'm asking him does that seem to be accurate or inaccurate.

DD: Perfect. So, we know that these are...we do...have not confirmed that these are all factual.

AD: No, we have not.

DD: Perfect, thank you.

KH: Alright. And since we didn't do this from the start, I'm going to go back and for the record, to get it on, we have filed a grievance with the Chief on this investigation for it to be suspended. That is based on policy 20...or excuse me, 1020.2.3 and I'll quote, "Complaints that are not of a criminal nature shall be accepted by the Spokane Police Department up to one year from the date of the

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occurrence consistent with Spokane Police Ombudsman's ordinance." Furthermore, Article 24 of the contract states, and I'll quote, "Both parties recognize that police officers have certain rights and responsibilities. Some of these responsibilities are included in the department policy manual under the title complaints and disciplinary procedures." Further I think it's important that we note for the record that the administration and the Captains and Lieutenants Association is mindful of Lieutenant Meyer's investigation and how 1020.2.3 was used to limit that investigation by time of one year and if they're drawing a different conclusion here, that is problematic for them. One more issue on this. Discipline in this case will also be considered an unfair labor practice as we are violating our own policies. Okay, having said that. I have a few questions for Chris. At any time during the 2015 investigation, did you try to mislead, lie, misstate facts in that interview?

CC: No, I did not.

KH: Did you answer all the questions in that interview truthfully?

CC: Yes, I did.

KH: I think I'll stand on that for now. David, do you have any?

DD: No.

AD: Okay.

KH: She doesn't get to. Yeah.

AD: If no one else has any questions, I am going to conclude the interview. The time is now 6:28 PM.

[End of Recording]

SPOKANE EXHIBIT 13

I did not see him in 17!!!!!!
No You weren't cheated
on!!!!!! Last I saw him was
jan 11 16. That is when all
hell broke loose for him
because of Asian girl. I
didn't find out about that
until then. He wanted to
make sure I didnt plan on
joining the case. I wrote
asian girl where I did after
talking to him to get a look
at what that meant for my
timeline. I know because I
lived it!! As for 2017 I DID
NOT SEE HIM!!! Dates
matching up? Yeah right.
Wasn't me!!!!!! This is
bullshit.

SPOKANE EXHIBIT 14

Nepotism And Conflicting Relationships

1050.1 PURPOSE AND SCOPE

The purpose of this policy is to ensure equal opportunity and effective employment practices by avoiding actual or perceived favoritism, discrimination, or actual or potential conflicts of interest by or between members of this department. These employment practices include: recruiting, testing, hiring, compensation, assignment, use of facilities, access to training opportunities, supervision, performance appraisal, discipline and workplace safety and security.

1050.1.1 Definitions

Business relationship - Serving as an employee, independent contractor, compensated consultant, owner, board member, shareholder or investor in an outside business, company, partnership, corporation, venture or other transaction where the Department employee's annual interest, compensation, investment or obligation is greater than \$250.

Conflict of interest - Any actual, perceived or potential conflict of interest in which it reasonably appears that a department employee's action, inaction or decisions are or may be influenced by the employee's personal or business relationship.

Nepotism - The practice of showing favoritism to relatives in appointment, employment, promotion or advancement by any public official in a position to influence these personnel decisions.

Personal relationship - Includes marriage, cohabitation, dating or any other intimate relationship beyond mere friendship.

Public official - A supervisor, officer or employee who is vested with authority by law, rule or regulation, or to whom authority has been delegated.

Relative - An employee's parent, stepparent, spouse, domestic partner, significant other, child (natural, adopted or step), sibling or grandparent.

Subordinate - An employee who is subject to the temporary or ongoing direct or indirect authority of a supervisor.

Supervisor - An employee who has temporary or ongoing direct or indirect authority over the actions, decisions, evaluation and/or performance of a subordinate employee.

1050.2 RESTRICTED DUTIES AND ASSIGNMENTS

The Department does not prohibit all personal or business relationships between employees. However, in order to avoid nepotism or other inappropriate conflicts, the following reasonable restrictions shall apply:

- (a) Employees are prohibited from directly supervising, occupying a position in the line of supervision or being directly supervised by any other employee who is a relative or with whom they are involved in a personal or business relationship.

Spokane Police Department

Policy Manual

Nepotism and Conflicting Relationships

1. If circumstances require that such a supervisor/subordinate relationship exist temporarily, the supervisor shall make every reasonable effort to defer matters pertaining to the involved employee to an uninvolved supervisor.
 2. When personnel and circumstances permit, the Department will attempt to make every reasonable effort to avoid placing employees in such supervisor/subordinate situations. The Department, however, reserves the right to transfer or reassign any employee to another position within the same classification in order to avoid conflicts with any provision of this policy.
- (b) Employees are prohibited from participating in, contributing to or recommending promotions, assignments, performance evaluations, transfers or other personnel decisions affecting an employee who is a relative or with whom they are involved in a personal or business relationship.
- (c) Whenever possible, FTOs and other trainers will not be assigned to train relatives. FTOs and other trainers are prohibited from entering into or maintaining personal or business relationships with any employee they are assigned to train until such time as the training has been successfully completed and the employee is off probation.
- (d) To avoid actual or perceived conflicts of interest, members of this department shall refrain from developing or maintaining personal or financial relationships with victims, witnesses or other individuals during the course of or as a direct result of any official contact.
- (e) Except as required in the performance of official duties or, in the case of immediate relatives, employees shall not develop or maintain personal or financial relationships with any individual they know or reasonably should know is under criminal investigation, is a convicted felon, parolee, fugitive, or registered sex offender, or who engages in serious violations of state or federal laws.
- (f) The department may prohibit relatives and employees who are in a personal relationship, from working on the same patrol team, in a work assignment, or within the same work group.

1050.2.1 Employee Responsibility

Prior to entering into any personal or business relationship or other circumstance which the employee knows or reasonably should know could create a conflict of interest or other violation of this policy, the employee shall promptly notify his/her uninvolved, next highest level of supervisor.

Whenever any employee is placed in circumstances that would require the employee to take enforcement action or provide official information or services to any relative or individual with whom the employee is involved in a personal or business relationship, the employee shall promptly notify his/her uninvolved, immediate supervisor. In the event that no uninvolved supervisor is immediately available, the employee shall promptly notify dispatch to have another uninvolved employee either relieve the involved employee or minimally remain present to witness the action.

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Nepotism and Conflicting Relationships

1050.2.2 Supervisors Responsibility

Upon being notified of, or otherwise becoming aware of any circumstance that could result in or constitute an actual or potential violation of this policy, a supervisor shall take all reasonable steps to promptly mitigate or avoid such violations, whenever possible. Supervisors shall also promptly notify the Chief of Police of such actual or potential violations through the chain of command.

SPOKANE EXHIBIT 15

Disciplinary Policy

340.1 PURPOSE AND SCOPE

This policy establishes standards of conduct that are consistent with the values and mission of this department and are expected of its members. The standards contained in this policy are not intended to be an exhaustive list of requirements and prohibitions but they do identify many of the important matters concerning member conduct. Members are also subject to provisions contained throughout this manual as well as any additional guidance on conduct that may be disseminated by the Department or the member's supervisors.

This policy applies to all employees (full- and part-time), reserve officers and volunteers.

340.2 DISCIPLINE POLICY

The continued employment of every employee of this department shall be based on conduct that reasonably conforms to the guidelines set forth herein. Failure of any employee to meet the guidelines set forth in this policy, whether on-duty or off-duty, may be cause for disciplinary action.

An employee's off-duty conduct shall be governed by this policy to the extent that it is related to act(s) that may materially affect or arise from the employee's ability to perform official duties or to the extent that it may be indicative of unfitness for his/her position.

340.2.1 Progressive Discipline

The administration of discipline is generally expected to be progressive in nature, with relatively minor violations of rules resulting in minor disciplinary action for first offenders. Repetitive similar violations, or more serious violations, would generally result in progressively more serious forms of discipline being administered.

Nothing in this policy is intended to preclude the administration of more serious forms of discipline, including termination, for a first offense when warranted by the seriousness of the offense.

340.3 CONDUCT WHICH MAY RESULT IN DISCIPLINE

The following list of causes for disciplinary action constitutes a portion of the disciplinary standards of this department. This list is not intended to cover every possible type of misconduct and does not preclude the recommendation of disciplinary action for specific action or inaction that is detrimental to efficient department service:

340.3.1 Attendance

The following actions are misconduct:

- (a) Unexcused or unauthorized absence or tardiness on scheduled day(s) of work.

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- (b) Failure to report to work or to place of assignment at time specified and fully prepared to perform duties to include all duty assignments whether extra-duty, overtime details, or regular duty assignments.

340.3.2 Conduct

The following actions are misconduct:

- (a) Fighting, or threatening other employees in the workplace.
- (b) Initiating any civil action for recovery of any damages or injuries incurred in the course and scope of employment without notifying the Chief of Police of such action.
- (c) Using departmental resources in association with any portion of their independent civil action. These resources include, but are not limited to, personnel, vehicles, equipment and privileged records.
- (d) Failure to notify the department within 24-hours of any change in residence address and home phone number.
- (e) Engaging in horseplay resulting in injury or property damage.
- (f) Unauthorized possession of, loss of, or damage to department property or endangering it through unreasonable carelessness.
- (g) Failure of any employee to promptly and fully report activities on the part of any other employee where such activities may result in criminal prosecution and when such activity may materially affect the employees ability to perform official duties or may be indicative of unfitness for his/her position.
- (h) Failure of any employee to report activities that have resulted in official contact by any law enforcement agency, that resulted in a criminal charge that may materially affect the employees ability to perform official duties or may be indicative of unfitness for his/her position, excluding off-duty traffic infractions.
- (i) The use of any information, photograph, video or other recording obtained or accessed as a result of employment with the department for personal or financial gain or without the expressed authorization of the Chief of Police or his/her designee may result in discipline under this policy.
- (j) Seeking restraining orders against individuals encountered in the line of duty without notifying the office of the Chief of Police.
- (k) Discourteous or disrespectful treatment of any member of the public or any member of this department or another law enforcement agency.
- (l) Solicitation of a personal or sexual relationship while on-duty or through the use of official capacity.
- (m) Engaging in on-duty sexual relations.

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- (n) Becoming surety or guarantor or going on bond of or furnishing bail for any person, except for immediate family members, arrested for a crime, without notifying the Chief of Police.

340.3.3 Discrimination

The following actions are misconduct:

- (a) To discriminate against any person because of age, race, color, creed, religion, sex, sexual orientation, national origin, ancestry, marital status, physical or mental disability or medical condition.

340.3.4 Intoxicants

It is misconduct to commit any violation of departmental policies related to the possession, use or consumption of drugs or alcohol.

340.3.5 Performance

The following actions are misconduct:

- (a) Unauthorized sleeping during on-duty time or assignments.
- (b) Concealing or attempting to conceal evidence of misconduct.
- (c) Unauthorized access and/or, intentional release of designated confidential information, personnel file materials, data, forms or reports.
- (d) Disobedience or insubordination to constituted authorities including refusal or deliberate failure to carry out or follow any proper lawful order from any supervisor or person in a position of authority.
- (e) The wrongful or unlawful exercise of authority.
- (f) Knowingly making false, misleading or malicious statements that are reasonably calculated to harm or destroy the reputation, authority or official standing of the department or members thereof.
- (g) The falsification of any work-related records, the making of misleading entries or statements with the intent to deceive, or the willful and unauthorized destruction and/or mutilation of any department record, book, paper or document.
- (h) Wrongfully loaning, selling, giving away or appropriating any department property for the personal use of the employee or any unauthorized person(s).
- (i) The unauthorized use of any badge, uniform, identification card or other department equipment or property.
- (j) Accepting fee or gift: Members shall not directly or indirectly accept from any person liable to arrest, or in custody, or after discharge, or from any friend or relative of such person, any gratuity, fee, loan, or gift whatsoever.

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Disciplinary Policy

- (k) Members shall not accept any fee, gift, or reward from any person or organization which is given to benefit the member as an individual, rather than the entire Department, when the fee, gift, or reward is given to recognize an act or deed which the member performed in the course of his/her duties. "Fee, gift, or reward" shall not include plaques, awards, or symbols of recognition, which are of slight, incidental monetary value.
- (l) Accepting product or service: Members shall not accept any product or service from merchant at a rate not offered to general customers of the merchant.
 - 1. Two exceptions exist to the above policy:
 - (a) Events/functions of an appreciative nature approved in advance, in writing, by the Chief of Police (e.g., an annual breakfast hosted by a not-for-profit organization to show support for public safety).
 - (b) Awards of a monetary value distributed in conjunction with graduation from the Washington State Criminal Justice Training Commission's Basic Law Enforcement Training Academy.
- (m) Work related dishonesty, including attempted or actual theft of department property, or the property of others.
- (n) Unauthorized removal or possession of departmental property or the property of another employee.
- (o) Failure to disclose material facts or the making of any false or misleading statement on any application, examination form or other official document, report, form, or during the course of any work-related investigation.
- (p) Failure to take reasonable action while on-duty and when required by law, statute, resolution or approved department practices or procedures. This is not intended to interfere with the officers reasonable use of discretion in the enforcement of the law.
- (q) Misappropriation or misuse of public funds.
- (r) Exceeding lawful peace officer powers.
- (s) Unlawful gambling or unlawful betting on department premises or at any work site.
- (t) Substantiated, active, continuing association on a personal rather than official basis with a person or persons who engage in, or are continuing to engage in, serious violations of state or federal laws, where the employee has or reasonably should have knowledge of such criminal activities, except where specifically directed and authorized by the department.
- (u) Solicitations, speeches, or distribution of campaign literature for or against any political candidate or position while on-duty or on department property except as expressly authorized.
- (v) Engaging in political activities during assigned working hours except as expressly authorized.

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Disciplinary Policy

- (w) Violating any felony statute or any misdemeanor statute where such violation that may materially affect the employees ability to perform official duties or may be indicative of unfitness for his/her position.
- (x) Any failure or refusal of an employee to properly perform the function and duties of an assigned position.
- (y) False or misleading statements to a supervisor or other person in a position of authority in connection with any investigation or employment-related matter.
- (z) While on duty or in an official capacity, recommend or suggest to any person the employment or hire of a specific person as an attorney or counsel, bail bondsman, towing service, or other services with a nexus to the department.
- (aa) Members shall not serve civil process, such as Summons and Complaint or a Summons and Petition, or other civil process on a voluntary basis or for pay. This policy does not include the lawful service of orders, notices or other official documents in the performance of their duties.
- (ab) Conduct unbecoming: No member of the department shall conduct himself/herself in a disorderly manner at any time, either on or off duty, or conduct himself/herself in a manner unbecoming the conduct of a member of the City of Spokane Police Department.
- (ac) Failure to maintain required and current licenses (e.g. driver's license) and certifications (e.g. first aid).

340.3.6 Safety

The following actions are misconduct:

- (a) Failure to observe written or oral safety instructions while on duty and/or within department facilities or to use required protective clothing or equipment.
- (b) Knowingly failing to report any on-the-job or work related accident or injury within 24 hours.
- (c) Substantiated unsafe or improper driving in the course of employment.
- (d) Engaging in any serious or repeated violation of departmental safety standards or safe working practices.

340.3.7 Security

The following actions are misconduct:

- (a) Unauthorized access and/or, intentional release of designated confidential information, materials, data, forms or reports.

340.3.8 Supervision Responsibility

The following actions are misconduct:

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- (a) Unsatisfactory work performance, including but not limited to failure, incompetence, inefficiency or delay in performing and/or carrying out proper orders, work assignments or instructions of supervisors without reasonable and bona fide excuse.

340.3.9 Supervision Responsibility

The following actions are misconduct:

- (a) Failure of a supervisor to take appropriate action to ensure that employees adhere to the policies and procedures of this department and the actions of all personnel comply with all laws.
- (b) Failure of a supervisor to appropriately report known misconduct of an employee to his/her immediate supervisor or to document such misconduct as required by policy.
- (c) The unequal or disparate exercise of authority on the part of a supervisor toward any employee for malicious or other improper purpose.

340.4 INVESTIGATION OF DISCIPLINARY ALLEGATIONS

Regardless of the source of an allegation of misconduct, all such matters will be investigated in accordance with Personnel Complaint Procedure Policy Manual § 1020 and RCW 41.12.090.

340.5 RESIGNATIONS/RETIREMENTS PRIOR TO DISCIPLINE

In the event that an employee tenders a written retirement or resignation prior to the imposition of discipline, it shall be noted in the file.

The tender of a retirement or resignation by itself shall not serve as grounds for the termination of the investigation. Any such tender will be evaluated to determine whether that action renders any further investigation or action moot.

340.6 NOTIFICATION TO CJTC CERTIFICATION BOARD

Upon termination of a peace officer for any reason, including resignation, the agency of termination shall, within fifteen days of the termination, notify CJTC on a personnel action report form provided by the commission. The agency of termination shall, upon request of CJTC, provide such additional documentation or information as the commission deems necessary to determine whether the termination provides grounds for revocation of the peace officer's certification (RCW 43.101.135).

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LAW ENFORCEMENT CODE OF ETHICS

Members of the SpokanePolice Department shall not use any narcotics, hallucinogens or any other controlled substance except when legally prescribed. When such controlled substances are prescribed, members shall notify their supervisors prior to reporting for duty.

Standard 4.4:

Members of the SpokanePolice Department shall maintain a level of conduct in their personal and business affairs in keeping with the high standards of the SpokanePolice Department.

Standard 4.5:

Members of the SpokanePolice Department shall not undertake financial obligations which they know or reasonably should know they will be unable to meet, and shall pay all just debts when due.

Standard 4.6:

Members of the SpokanePolice Department shall not engage in illegal political activities.

Standard 4.7:

Members of the SpokanePolice Department shall not permit or authorize for personal gain the use of their name or photograph and official title identifying them as members of the SpokanePolice Department in connection with testimonials or advertisements for any commodity, commercial enterprise, commercial service which is not the product of the member involved.

Standard 4.8:

Members of the SpokanePolice Department shall not engage in any activity which would create a conflict of interest or would be in violation of any law.

Standard 4.9:

Members of the SpokanePolice Department shall at all times conduct themselves in a manner which does not discredit the law enforcement profession or the SpokanePolice Department.

Standard 4.10:

Members of the SpokanePolice Department shall not be disrespectful, insolent, mutinous or insubordinate in attitude, or conduct, or by disregarding a lawful order.

Standard 4.11:

Members of the SpokanePolice Department shall be courteous and respectful in their official dealings with the public, fellow members, superiors and subordinates.

Standard 4.12:

Members of the SpokanePolice Department shall not engage in any strike, work obstruction, or abstention, in whole or in part, from the full, faithful, and proper performance of their assigned duties and responsibilities, except as authorized by law.

Standard 4.13:

SPOKANE EXHIBIT 16



SPOKANE POLICE DEPARTMENT

MEMORANDUM



CONFIDENTIAL – ADMINISTRATIVE REVIEW PANEL

I.A. # C20-074

Incident # 2i

COMPLAINT: Allegations of

- 1) **Violation of Policy 1050.2d** Developing and maintaining a personal relationship with an individual as a direct result of any official contact.
- 2) **Violation of Standard 4.9-Conduct Unbecoming**
- 3) **Violation of Policy 340.3.2m** Engaging in on duty sexual relations
- 4) **Violation of Policy 340.3.5p**-Failure to disclose material facts or the making of false or misleading statement during the course of any work related investigation.

COMPLAINANT: 2i

OCCURRED: Between 5/30/15 and 1/14/16

LOCATION: 2i and 3630 E. 51st.

EMPLOYEE: Chris Conrath #1106

On 12/09/20, an Administrative Review Panel was held to discuss this case. Present were:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Captain Richards | <input type="checkbox"/> Lieutenant Overhoff (Recused) |
| <input checked="" type="checkbox"/> Captain Meidl (Author) | <input checked="" type="checkbox"/> Lieutenant Reese |
| <input type="checkbox"/> Lieutenant Wohl (Recused) | |

COMPLAINT

"Officer Chris Conrath responded to a domestic situation at 2i During the response he exchanged personal phone numbers with female victim. An inappropriate sexual relationship ensued from June 6 2015 until at least 12/19/2015. Some meetings it is believed he was on duty."

FACT PATTERN

On 9/11/20, Internal Affairs received the above complaint online from 2i In addition to the complaint, he stated he was "in possession of notes taken by victim on 2015/2016 calendars that journaled their relationship".

The CAD history of the initial call, 2015-175293, showed Officer Chris Conrath dispatch himself to the report of Malicious Mischief on 05/27/15 at [REDACTED] 2i. The complainant on the call, [REDACTED] 2i called to report damage to her sprinkler system. She thought the suspect was her husband, [REDACTED] 2i because they were "going through a nasty divorce". Conrath showed on scene at the address at 19:12 hours and cleared the call at 20:27 hours with notes stating: "No actual damage to any of [REDACTED] 2i property, no crime, system did not appear to have been winterized properly, I believe she has a damaged valve which will need to be replaced." He changed the call type from MALMS to SUSCIR and cleared with no report.

Sergeant Dollard interviewed [REDACTED] 2i by phone on 10/14/20. [REDACTED] 2i stated he and [REDACTED] 2i were married in 2010 and divorced in June 2015, due to [REDACTED] 2i alcoholism. In August 2020, [REDACTED] 2i and [REDACTED] 2i began to reconcile and they moved back in together. [REDACTED] 2i came across some calendars in a box of [REDACTED] 2i belongings. The calendars belonged to [REDACTED] 2i and had numerous entries with the name "Chris" after an entry stating, "Policeman came" on May 27, 2015. He later learned from [REDACTED] 2i that the officer was Chris Conrath. [REDACTED] 2i searched Conrath's name online and discovered he had been involved "in another situation such as this and I thought that there potentially might be some type of predatory or other concerning behaviors with a police officer". [REDACTED] 2i provided photocopies of [REDACTED] 2i calendars to Sgt. Dollard. During his interview, [REDACTED] 2i said [REDACTED] 2i writes down everything and journals. [REDACTED] 2i stated he also contacted Chris' wife, [REDACTED] 15 and spoke with her about the details he knew of the relationship to make her aware.

Sgt. Dollard and Dir. MacConnell interviewed [REDACTED] 2i in person on 10/22/20. They did not disclose to her that [REDACTED] 2i had given them photos of her calendar entries. [REDACTED] 2i stated she first met Chris Conrath in 2015 [calendar indicates 5/27/15, CAD call is dated 5/27/15] when he responded to her house on [REDACTED] 2i. She called to report her sprinkler system being damaged. She was going through a divorce and she thought her soon-to-be ex-husband, [REDACTED] 2i had cut the wires. [REDACTED] 2i said Chris looked at the sprinkler system and said, "Maybe I can come back this weekend when I'm not on duty and see if I can fix it". She wasn't sure exactly when they exchanged phone numbers [calendar indicated "he texted any luck w/your sprinkler" on 5/28/15]. She said Chris came back to her house "very soon after", possibly that following Saturday [calendar indicates 5/30/15 "Chris to fix sprinkler" and 6/1/15 "Chris sprinkler"], and looked at her sprinkler system. [REDACTED] 2i said she was "taken aback" by Chris offering to come back to help, because "it was a cop". [REDACTED] 2i stated "I know he came over soon to look at the sprinkler and then he...he stayed over one night here. Soon after I first met him, I don't know how soon." [calendar indicates "Chris stayed night" on 6/6/15] Chris stayed the night at the house on [REDACTED] 2i just "once", according to [REDACTED] 2i because she had to move out and into an apartment.

[REDACTED] 2i then moved into the Ashton Apartments, located at 3630 E. 51st. She said "he did come over there, I think he stayed there once" [calendar indicates "Chris stayed night" on 7/2/15 and 7/3/15]. [REDACTED] 2i said Chris came to the [REDACTED] 2i address only once in uniform, when he responded to her original report call. She said he came to her apartment once in his police uniform as well, where she said "I went down on him". Sgt. Dollard confirmed she meant "oral sex" and [REDACTED] 2i replied "yes" [calendar indicates "Chris on duty" on 8/20/15, but unknown if that is for this event]. When asked if she could remember specific information, [REDACTED] 2i said "I

had a calendar where I wrote stuff down at this time, if I can find my 2015 calendar." And "'Cause I wrote stuff down of like dates, so I have dates". 2i mentioned needing her calendar multiple times during the interview, stating, "That's why I need my calendar" and "'Cause I have all this marked". She also stated, "I keep all my calendars, too, 'cause I write stuff, so much like...when did that happen and then I can always go back..."

2i also said Chris took her to the range once to shoot [calendar indicates "Shooting 1st Lesson Chris" on 6/11/20] and on one ride along [calendar entry indicates "Ride Along Chris" on 6/26/15, Ride along waiver is dated 6-26-15].

When asked about the investigation involving Chris and another woman, 2i said Chris told her about it and was "very concerned that I would say something too". 2i told him she wouldn't say anything. When asked how the relationship ended, she said, "...that was the ending when he got in trouble" and "There wasn't a lot of communication, so it just ended by fizzling out you know." 2i also added, "...when I...you see my calendar we can see".

Dir. MacConnell asked 2i "Are you pretty sure that after you found out about the other relationship, that you and he had no further in person contact?" She responded, "I think we may have once, at that apartment. I think. I know he came over there to talk to me about the situation that he was in, 'cause...yeah, he came over...oh, if I had my calendar. He came over there to talk to me that he was going to get into trouble and you know, things...I might be hearing things or something, and I think we did have sex that day and I...that was the last time [calendar indicates "Chris came over" and "Chris daytime coffee/lunch" on 1/11/16]. And then he called me." [calendar indicates "Talked to Chris on phone" on 1/14/16]

When asked about the total number of times she and Chris had sexual relations, 2i said, "I can't remember. My calendar would be better, but I don't think I marked sex on there...But I just marked... if it said "Chris over", then that probably means it. That's why I mark my calendar."

The photos of the actual calendar entries possibly indicating those events are:

Chris stayed night 6/6/15

Chris came over after work 6/22/15

Chris stayed night 7/2/15

Chris stayed night 7/3/15

Chris came over after work 7/14/15

Chris motorcycle came over 8/2/15

Have Chris come over, Chris came over 9/8/15 (also written is "Asian girl")

Chris came in daytime 9/17/15

No entries in October

Chris came over 11/30/15

Chris came over 12/19/15

Chris came over, Chris daytime coffee/lunch 1/11/16

Other calendar entries indicate: the initial call, sprinklers being fixed, Chris' work schedule, talking on phone, texts he sent, Chris stopping by, the ride along, the shooting lesson, Chris telling her about his wife's tumor and cancer, him meeting her friend Laurel, "Chris after work" statements, his birthday, Chris' last day, Chris sent home early, 1 mo=2 mo, and Chris on news.

Sgt. Dollard asked [REDACTED] 2i "Do you...since then have you thought that what...what he did was inappropriate?" [REDACTED] 2i replied, "Oh, I think it's inappropriate".

Sergeant Dollard and Lieutenant Cowles interviewed Chris Conrath on 10/29/20. When asked, Chris remembered [REDACTED] 2i and going to the Malicious Mischief call at [REDACTED] 2i on 5/27/15 and said "it was immediately determined that no crime had occurred and there was no damage to her property". Prior to making that determination, he said the complainant speculated, "my ex-husband could've been involved, it could've been a neighbor kid." Chris looked at the sprinkler system and was able to identify a broken "valve that wasn't working correctly". Because Chris determined no crime occurred, he did not complete an incident report. He said, "She didn't have any ideas. I offered to, on my days off, come back and help her with fixing that sprinkler system. And I did that." Chris didn't remember exactly when he went back to her house, off duty, saying, "I can only assume it was my next weekend, so it was a matter of three to five days.." [*coinciding with the calendar entry*].

He stated, "I went there for the purpose of helping this citizen repair her sprinkler system as something that I...the type of thing that I do on a regular basis for my friends and neighbors...And during that time, we developed a bit of a friendship, which continued on for a period of time. And in the coming weeks and months, it had developed into a more private, intimate relationship." When asked if this is something he does for other people on call or that, he comes in contact with in the course of his duty, Chris replied, "No, I do not." And agreed that it was a one-time thing.

Sgt. Dollard showed Chris the photocopies of the calendar that [REDACTED] 2i had given, asking him about dates of the initial contact and entries soon after, checking the accuracy. Chris agreed with the accuracy of the first couple entries, saying "that makes sense to me". The entry stating "Chris to fix sprinklers" on May 30th, he said "I would say that's accurate." Regarding taking [REDACTED] 2i to the academy to shoot, Chris commented on the calendar entry, "Okay. I would say that might be accurate. We did go to the range together...It was off duty."

Chris stated he didn't remember running [REDACTED] 2i name, didn't know she was arrested earlier in the year for DUI, or that she'd been involuntarily committed on two occasions. He did say, "I saw this woman multiple times over the course of three or four months."

When asked about the June 6 calendar entry "Chris stayed night" and in Telestaff, it showed he had a switch day off, Chris said, "So, I took the night off and I went to go see her. That's what it looks like."

When asked how many times he went to [REDACTED] 2i after work, Chris said, "It would be difficult for me to estimate a number of times, but over the course of three to four months, maybe once every other week or slightly more frequently than that." Chris admitted to having both intercourse and oral sex with [REDACTED] 2i. When asked if it was on every one of the nights he went there, he said, "I wouldn't say that it was on every one of the nights, but most of them." And in response to questioning the calendar entries stating, "Chris came over after work and Chris stayed night", Chris replied, "That is something that I did regularly, so...".

Chris admitted to "probably" seeing her sometime when he was at work, but said, "...there was no inappropriate conduct during those times."

Sgt. Dollard clarified, "Kay. If...if she were to say that you went there while on duty and she gave you oral sex, she would be lying?" Chris replied, "Correct".

Chris stated he told [2i] about the investigation involving [2i] but didn't think it happened on 9/8/15, where "Asian girl" was written in the calendar. He stated, "It looks to me as though someone is going back and making notations on a calendar about things that may or may not have occurred, but that was not accurate in the timeline of events."

When ask if he had a conversation with [2i] asking her whether or not she was going to report their relationship, Chris replied, "No, I don't believe I did." He said, "I didn't see this as a...at that time, as a...as a violation of policy. I thought I was engaging in an off duty, personal relationship that should not have been of concern to the Police Department at that time. I was later involved in an Internal Affairs investigation for something that I think is significantly different, but comparable, and that was the period of time at which I remember breaking things off with [2i]" When asked when he broke up the relationship with [2i], Chris said, "...I don't recall specifically 'cause it was five years ago...At the point that I was advised that there was a pending Internal Affairs investigation for this other incident....it was at about that same period of time, whenever that was."

Sgt. Dollard told Chris his IA interview with Sgt. Staben occurred on 10/6/15. Chris said, "So, yes, I would say it was in very close time frame to that October 6th date that I ended things with her." Chris said, "I don't remember having any communication with her after that time. That's not to say...there...there may not have been a phone conversation or something like that...I very specifically and intentionally ended that relationship at that period of time." He did not think he saw her in person after that, but said, "...there's a certain element of apology that has to take place."

Chris stated he thought his relationship was different with [2i] from the one with [2q] because [2i] was not the victim of a crime. She was not involved in a domestic dispute." He also said, "She was a person that I did meet while on duty and though it was not my intent at that time, I did develop a personal relationship with her to involve physical intimacy. And that did happen..."

During the 10/6/15 interview, Chris stated, "All I would add is that I freely recognize that this was my wrongdoing and I made a big mistake, and I take responsibility for it. This kind of thing would never happen to me again." Sgt. Dollard asked, "At that time, on October 6th, were you still engaged in a relationship with [2i]?" Chris responded, "No, I was not." He added, "I'm saying that when I was advised of the pending Internal Affairs situation (IA Notice was sent to Chris on 10/5/15), the problem...the problem that I was dealing with here, during this interview, that was the point at which I made the decision to terminate my relationship with [2i] [2i] Yes."

When asked about the calendar entry "Chris came over" on 12/19/15, Chris said, "I don't think that's accurate."

When asked about the calendar entry "talked to Chris on phone" on 1/14/16, Chris said, "I don't believe I was having any contact with her during that time."

When asked about the calendar entry "Chris came over" on 1/11/16, Chris said, "That's inaccurate."

When asked about calendar entries prior to October, Chris stated, "I would say that they are consistent with my memory, yes."

Sgt. Dollard told Chris [2i] told IA investigators that she said their relationship, including sexual contact, continued into January, Chris said, "I would dispute that. That my sexual relationship with her did not continue until January."

There were concerns regarding the calendar entries and who wrote them.

Sgt. Dollard conducted a second interview with [REDACTED] 2i on 11/4/20. He was asked if he wrote anything anywhere on any of the calendar. [REDACTED] 2i replied, "No. I did not." He added, "No. No, that's all [REDACTED] 2i". He didn't think she would have added anything later because "it was just something that she had stored away." [REDACTED] 2i also said "...she just said that when the thing with the Asian girl came down that that was pretty much when their...whatever it was, ended."

Sgt. Dollard and Dir. MacConnell conducted a second interview with [REDACTED] 2i on 11/12/20. The photocopies of the calendar months were shown to [REDACTED] 2i to clear up any questions. Sgt. Dollard had highlighted only items on the calendar that referenced Chris. She was asked if those entries were made by her or her handwriting. [REDACTED] 2i said, "These are all mine." She didn't know if the "Asian girl" entry on the calendar was written that particular night, and said, "I was trying to calculate back in time when that would be for myself." [REDACTED] 2i added, "He came over then to tell me what was going on and to make sure I wasn't going to say anything." When asked what date, she said "the 11th of January". She also said, "If I didn't mark it, it didn't happen." When she was asked about a definitive conversation like "hey it's over, we're done, we can't...", she said, "There just wasn't." In talking about the sporadic entries, [REDACTED] 2i said, "...except in the end when he was obvious in...obviously into, you know trouble and then he was like scared to do anything more for a while, I guess." She also confirmed, "If I saw him I would have wrote it." [REDACTED] 2i was never able to locate her 2015/16 calendar.

ANALYSIS

This investigation is five years after these events occurred, resulting in some lapses in memory of specific details from [REDACTED] 2i and Chris Conrath.

There is no dispute that Chris Conrath met [REDACTED] 2i as a result of an official police contact; [REDACTED] 2i called Crime Check to report what she thought was a crime, she asked for police to respond, and Chris dispatched himself to that call for service.

There is no dispute that Chris Conrath and [REDACTED] 2i developed a personal relationship, including sexual conduct, as a result of that contact. Both acknowledged this occurred.

[REDACTED] 2i complaint noted improper conduct from a police officer. [REDACTED] 2i calendar entry of "Chris on news" and her comment that she thought what Conrath did was inappropriate both acknowledged improper conduct from a police officer.

[REDACTED] 2i claims to have engaged in oral sex with Chris while he was in uniform and on duty. Chris denied this claim, stating he has likely seen her on duty but that no inappropriate contact took place during those visits. There is no way to determine if this event actually occurred.

[REDACTED] 2i and [REDACTED] 2i claim that [REDACTED] 2i logs items in her calendar as a matter of routine, in order to keep track of events and dates. [REDACTED] 2i indicates that if it is written in her calendar, then it happened, as well as confirming that she wrote every entry on the pages photocopied out of her 2015/2016 calendar. [REDACTED] 2i stated she did not write the word "sex" in the calendar and said "Chris over" "probably means it", which meant the entries did not clearly define what took place on the dates entries were made. [REDACTED] 2i also stated she believes she went

back in time to write "Asian Girl" in her calendar. It is unknown if any other entries were made at the time they occurred or later on.

2i stated he did not write anything in 2i calendar.

Chris acknowledges 2i calendar entries prior to October 2015 are likely accurate, but challenges or denies the accuracy of every entry after October 2015.

Chris is adamant he ended the relationship with 2i when he learned about the IA investigation involving 2q. IA notified him on 10/5/15 and his IA interview was on 10/6/15. There are no calendar entries in October 2015. Entries begin again on 11/30/15, where "Chris came over". The same entry was made on 12/19/15 and 1/11/16, indicating they likely had contact that continued into January 2016. Chris said he didn't remember having contact with her after it ended, but "may have had a phone conversation or something like that". 2i said their relationship ended after she found out about the other relationship, that specific date/event is not marked in her calendar. She also said there "may" have been contact in person after that and "I think we did have sex", and a phone call. There is no proof that the relationship continued in the calendar, but there is the likelihood that they were still in contact with each other after the 2015 investigation, with three "Chris came over" entries and one phone call. This also may have been the contacts where Chris stated there was "a certain element of apology that has to take place." The last calendar entry referencing Chris on 1/14/16, stating "Talked to Chris on phone". One could infer this was likely their last conversation, as the entry written over 1/15/15 and 1/16/16 states "Started Match.com", but there is no way to know that as a fact. 2i also said he thought their relationship ended "when the thing with the Asian girl came down".

CONCLUSION

Chris Conrath developed and maintained a personal relationship with an individual as a direct result of an official contact.

Chris Conrath's conduct brings discredit to the law enforcement profession and the Spokane Police Department.

There is not enough evidence to prove Chris engaged in on duty sexual relations.

There is not enough evidence to prove Chris continued to engage in a sexual relationship after he stated he had ended the relationship.

FINDING

As to the allegation of

- 1) **Violation of Policy 1050.2d-** Developing and maintaining a personal relationship with an individual as a direct result of any official contact-**Sustained**
- 2) **Violation of Standard 4.9-** Conduct Unbecoming-**Sustained**
- 3) **Violation of Policy 340.3.2m-** Engaging in on duty sexual relations-**Not Sustained**
- 4) **Violation of Policy 340.3.5p-** Failure to disclose material facts or the making of false or misleading statement during the course of any work related investigation-**Not Sustained**



Captain Meidl, Author

12.9.20

Date




Captain Richards

120920

Date

Lieutenant Overhoff (Recused)

Date



Lieutenant Reese

12/9/20

Date

Lieutenant Wohl (Recused)

Date

Note: "Author" is to placed behind the person that crafted the document

SPOKANE EXHIBIT 17



CITY OF SPOKANE
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201-3327
509.625.6250

DATE: 01/25/2021

TO: Christopher Conrath, Police Officer

FROM: Scott Simmons, Interim City Administrator; Craig N. Meidl, Police Chief

SUBJECT: Findings of Internal Affairs investigation #C20-074

Reference: Merit System Rules of the Civil Service Commission; SPD Policies 1050.2D; 340.3.2M; 340.3.5P; and SPD Ethical Standard 4.9

This memorandum sets forth the findings of the Internal Affairs investigation #C20-074 based upon your violation of Civil Service Rules governing compliance with written department rules and procedures and Spokane Police Department (SPD) Policy 1050.2D and Ethical Standard 4.9.

The internal investigation was conducted as a result of a complaint of an inappropriate sexual relationship between you and a member of the public. The complaint alleged your contact with the other individual occurred when you responded to a call for service to a domestic situation. The allegations occurred during the years 2015 and 2016, and the SPD Policy manual in effect during that period was reviewed. The 2015/2016 SPD Policies reviewed in this investigation were:

1. SPD Policy 1050.2D: Developing and maintaining a personal relationship with an individual as a direct result of any official contact.
2. SPD Ethical Standard 4.9: Members of the Spokane Police Department shall at all times conduct themselves in a manner which does not discredit the law enforcement profession or the Spokane Police Department.
3. SPD Policy 340.3.2M: Engaging in on-duty sexual relations.
4. SPD Policy 340.3.5P: Failure to disclose material facts or the making of any false or misleading statement on any application, examination form or other official document, report, form, or during the course of any work-related investigation.

On 9/11/2020, SPD was contacted by a citizen, alleging that you had an inappropriate sexual relationship with his former wife following a domestic violence call for service on 5/27/2015. The citizen alleged his estranged wife chronicled that relationship from June 2015 to January 2016, which comprised of a ride-a-long with you, shooting at the Department's Academy range, visits from you while you were on-duty as well as off-duty and staying the night at her residence.

Due to the seriousness of the allegations, as well as prior history of similar behavior, Internal Affairs conducted an investigation into the allegations.

Administrative Review Panel (ARP) findings were submitted on 12/9/2020. The ARP recommended *Sustained* findings regarding the above-listed allegations 1 and 2 and *Not Sustained* findings on above-listed allegations 3 and 4.

On 1/21/2021, a *Loudermill* hearing was convened to provide you an opportunity to respond to the allegations of the complaint. Present at the hearing with you were: Craig Meidl, Police Chief; Justin Lundgren, Assistant Police Chief; Eric Olsen, Major; Mike McNab, Major; Jacqui MacConnell, Director of Strategic Initiatives; Jennifer Hammond, Director of Police Business Services; Meghann Steinolfson, Labor Relations Manager; Sgt. Arthur Dollard, Internal Affairs; Lt. Matt Cowles, Internal Affairs; Police Guild representatives Kris Honaker, David Dunkin and Ty Snider; and your attorney Joseph Kuhlman.

During the *Loudermill* hearing, your attorney indicated you were not prepared to make any further comments and that you believed that because the allegations occurred more than a year prior that they should not have been investigated. You acknowledged you had an extra-marital affair five years ago, you were harshly disciplined for a separate incident and that your work since then has been exemplary.

Based on the evidence, I am in agreement with the Administrative Review Panel that you violated SPD Policy 1050.2D and SPD Ethical Standard 4.9. I am also in agreement with the Administrative Review Panel that violation of SPD Policy 340.3.2M and SPD Policy 340.3.5P was not proven by clear and convincing evidence.

SPD Policy 1020.2.3D, which outlines the timeline to investigate non-criminal complaints, necessitates that no Department sanctions may be imposed.

Going forward, expected performance standards are as follows:

1. You will conduct yourself in a professional manner in your public and private affairs, exemplifying the high standards of integrity, trust, and morality demanded of a member of the Spokane Police Department.
2. You will be courteous and respectful in your official dealings with the public, fellow members, supervisors, and subordinates.
3. You are prohibited from having ride-a-longs for three years.
4. You are prohibited from taking non-family members to the shooting range for three years.

If you continue to violate SPD Policies or Civil Service rules as discussed in this letter, you will be subject to discipline up to and including termination.

Scott Simmons
Scott Simmons
Interim City Administrator, City of Spokane

1/25/21
Date

C. Meidl
Craig N. Meidl
Police Chief, City of Spokane

2/1/2021
Date

You are requested to provide your signature and to fill in the date line below acknowledging receipt of this correspondence. Any refusal to sign will be noted by your supervisor but will not result in any change in the processing of this document and its inclusion in your official personnel file.

C. Conrath 1106
Receipt Acknowledged – Officer Chris Conrath

020321 1630
Date Time

cc: Kelsey Pearson, Interim Chief Examiner, Civil Service
Craig Meidl, Police Chief
Justin Lundgren, Assistant Police Chief
Amber Richards, Human Resources Director
Meghann Steinolfson, Labor Relations Manager
Jennifer Hammond, Director, Police Business Services
Nate Odle, Legal
Kris Honaker, Guild President
Tim Schwering, Guild Vice President
David Dunkin, Guild Vice President

SPOKANE EXHIBIT 18



SPOKANE POLICE DIVISION
CHIEF OF POLICE
CRAIG N. MEIDL

Letter of Reprimand

July 18th, 2018

Officer Chris Conrath
Spokane Police Department

Officer Conrath,

The purpose of this letter of reprimand is to advise you that after an Internal Investigation (I.A. # C18-014) and thorough review of this matter, I find you violated the following Spokane Police Department Policies:

SPD Policy 344.1.1 Report Preparation: Reports should accurately reflect the identity of persons involved, all pertinent information seen, heard, or assimilated by any other sense, and any action taken.

SPD Policy 804.3 Property Handling: Any employee who first comes into possession of any property, shall retain such property in his/her possession until it is properly tagged and placed in the designated temporary property locker or storage room along with the evidence report form.

Summary:

On or about February 2nd, 2018, you responded with Officer Bryer to the Intermodal Facility on the report of an assault. When you arrived on scene, you contacted the victim and completed a thorough interview. You appropriately gathered relevant data surrounding the details of the assault and photographed the victim's injuries. After taking the statement, you searched the area for the suspect to include looking at the House of Charity. At some point during the investigation you were directed to an abandoned bag at the Intermodal. You were advised that this bag possibly belonged to the suspect in the assault. You and Officer Bryer reported that you looked through the bag for identification and items of value and found none. You then took the bag and disposed of it in a dumpster at the Intermodal.

SPD Policy 344.1.1 Report Preparation:

Bag possibly belonging to the suspect:





SPOKANE POLICE DIVISION
CHIEF OF POLICE
CRAIG N. MEIDL

A bag was found in the Intermodal that possibly belonged to the suspect in this incident. You took possession of this bag and looked for identifiable items within. Your report does not include any details about the bag, the contents, or your disposal of the item. While it is highly unlikely that the bag would have ever been processed for forensic evidence, its appearance may be helpful in the identification of the suspect. Documentation of the contents would help to protect against any accusation that valuable items were discarded or taken by officers.

Notation of Body Camera not being activated during law enforcement activities:

During the initial portion of the call when you contacted the victim and witness in this matter, you had your body camera activated in accordance with policy. You also properly activated your camera during your search of the area of the House of Charity for the suspect. However, your body camera was not activated while you searched and disposed of the bag at the Intermodal. It appears that you were unexpectedly contacted by the victim in this case after you had initially turned off your body camera. Due to your camera activation during the other portions of this call, I believe this was an inadvertent error on your part. It is important to document circumstances like these in your report with the reason the camera was not activated. Without this or any mention of the bag in the police reports you are at a disadvantage should anyone make a claim that they were improperly deprived of their property.

SPD Policy 804.3 Property Handling:

In your Internal Affairs interview you stated that the victim in this case notified you about a bag he believed possibly belonged to the suspect. The bag was found abandoned in the public area of the Intermodal facility. You and Officer Bryer took possession of this bag, looked through the contents, and threw it away in a dumpster. In this case the ownership of the bag was in question. After searching the bag, no identification or items of value were located. Due to the nature of the crime in question and the possibility that it belonged to the suspect, the proper method of handling would have been to place the item on property as evidence. If the item was not deemed to be evidentiary in nature, it may have been left with the Intermodal staff to handle as a lost and found item. Once it was collected by officers it was not within policy to throw the item into the garbage.

I have reviewed the completed investigation and evidence in this case. I have concluded that there is sufficient evidence to support a finding that you violated the above-referenced SPD policies. Any subsequent violations will be subject to progressive discipline.





SPOKANE POLICE DIVISION
CHIEF OF POLICE
CRAIG N. MEIDL

This Letter of Reprimand will remain in your Civil Service Personnel File for three (3) years. If there is no reoccurrence of similar misconduct after a minimum period of three years, you may request that this Letter of Reprimand be removed from your Civil Service File.

Sincerely,

A handwritten signature in dark ink, appearing to read "Justin Lundgren". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Justin Lundgren
Assistant Police Chief



SPOKANE EXHIBIT 19

DOCUMENTATION OF COUNSELING

NAME OF SUPERVISOR: M. Cowles, 604
NAME OF EMPLOYEE: C. Conrath 1106
DATE OF COUNSELING: 06/08/2019
TYPE OF COUNSELING: Verbal

☒ Job performance/duty
☐ Sick leave
☐ Training

☐ Safety
☐ Other _____

SUMMARY OF ISSUE/CONCERN: (attach applicable document/records)
Violation of Policy: Inadequate Response/Policy 320.9 DV Reporting,
Failure to relay officer safety information to officers.

SUMMARY OF COUNSELING GIVEN:

Officer Conrath it is incumbent on you to be at the top of your game when responding to calls for service. There were some failures at this call that you acknowledge were not your best work. Domestic Violence allegations have a higher expectation of service to the complainant / victim. We discussed how important it is for you to hold yourself to a high standard, that self discipline and awareness will serve you well in the future. You are expected to follow policy when performing your duties.

The officer safety information that was relayed to you should have been broadcast out to officers to make them aware of the possibility of danger involving this individual. As members of a team we rely on each other to be safe and successful. The expectation from this point onward is that you are actively evaluating scenarios and, should the situation warrant it, relay information to enhance the safety of others.

You make a significant contribution to the department and it is obvious that you are motivated by a deep caring for your peers and community. Your supervisors want you to have every opportunity to be successful.

In addition to this documentation, you will have a referral to Lt. McNabb at the Police Academy to report to training to be completed no later than July 15, 2019, or as the Academy schedule permits.

You are reminded that further violations of a similar nature may result in more significant levels of discipline.

Signature of Supervisor M. Cowles 604

I, C. Conrath (employee) acknowledge that the above-named supervisor did discuss with me the issues, concerns, and counseling noted above. I do/do not (circle one) agree with this counseling. I may submit additional comments to be attached to this form on today's date.

Date: 06/17/19 Employee: C. Conrath 1106

SPOKANE EXHIBIT 20



SPOKANE POLICE DIVISION
CHIEF OF POLICE
CRAIG N. MEIDL

***Internal Affairs Investigation
Case Finding Notice***

To: Officer Christopher Conrath #1106

Date: 8/2/2019

From: Assistant Chief Justin Lundgren #532

IA Number: C19-015

An internal review has been concluded concerning certain allegations of misconduct. These allegations stem from an incident that occurred on:

Received Date: 2/21/2019

Investigator: Sergeant J. Everly

Report Number: N/A

SPD Internal Complaint

Location: 1100 West Mallon Avenue

Allegation: Conduct Unbecoming

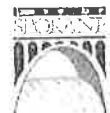
Finding: Unfounded

Sanction: None.


Assistant Chief Justin Lundgren #532

This case file will be maintained in the Internal Affairs files and available for your review. In the event of an "Improper Conduct" finding, a copy of any disciplinary report will become a part of your personnel file.

Public Safety Building • 1100 W. Mallon Avenue • Spokane, Washington 99260-0001





**Spokane Police Department
Internal Affairs
IA Additional**



IA Number #: C19-015
Incident Number #: N/A
Date: 2/21/2019
Investigator: Sergeant John Everly #950

Complaint Being Investigated

Potential misconduct involving a former SPD CO-OP, Anya Bogachov and current SPD Officers.

Interview Summaries

During this investigation I have interviewed Sgt. Huddle, Susan Babbitt, Officer Lynch, Officer D. Storch, Officer Conrath, and CO-OP Brazier.

Physical Evidence

Photographs of Bogachov's Social Media posts and CO-OP ride along Calendar from 3/2017 through 1/2019.

Investigative Summary

On 2-21-19 I was assigned this case by Director MacConnell. During a conversation with her I learned this case originated from the termination of a CO-OP identified as Anya Bogachov. Director MacConnell stated a retired SPD Detective, Brian Breen had contacted the agency and asked if Bogachov had been a CO-OP, if there was an investigation regarding her and which officers had been placed on Administrative Leave as a result. Director MacConnell told me she had a brief conversation with Sgt. Huddle regarding this issue as he is the Sergeant over Volunteer Services which supervises the CO-OP program. According to her, Sgt Huddle indicated he had heard information regarding potential misconduct between SPD Officers and CO-OPs. The misconduct ranged from possible romantic relationships to SPD Officers supplying alcohol to underage CO-OPs.

Director MacConnell provided me with a packet of Social Media posts from Bogachov. I looked through them and noted a number of them were taken at the Spokane Police Academy firing range. Three of the pictures depicting Bogachov at a firing range were taken at the Spokane Police Academy. One of those pictures identified her location as the Spokane Police Academy.

On 2/21/19 I received an email from Bogachov asking me if she was the subject of an internal investigation. She stated rumors had stated she has made a complaint against the department.

Bogachov stated that wasn't true, and she wanted it to be clear she has no intent on making a complaint against the department or any employee.

Starting on 2/22/19 I was off duty, and then was out of state on training during the week of 2/25 through 3/1/19. I returned to duty on 3/5/19.

On 3/5/19 at about 1000 hours I interviewed Sgt. Huddle. After serving him his Administrative Rights and advising him he was a witness officer we started the interview. I asked Sgt. Huddle if he knew Bogachov, and he said he did. He said she became a CO-OP around April of 2017. Sgt. Huddle characterized Bogachov's performance as a CO-OP as acceptable. He said after her initial training she was made a FTO, and then became a CO-OP Sergeant.

I asked Sgt. Huddle why he terminated Bogachov from the CO-OP program. He responded "Okay, starting probably in the middle of 2018 she was violating policy consistently. We have certain calls that they can go to on patrol. She was going to calls she absolutely should not have been on. She went on a DOA just to be able to, I think see a dead body. She went to a DV where there was...where the suspect had not been located and could've come back. So she knows she should not have been there. She was going and posting things on social media, when that is against SPD Policy. Social media...stuff that had to do with the police department, the range, the workout room, co-op car. She had been warned about it more than one time and so that's why she was released. She was doing things against policy." I asked Sgt. Huddle if Bogachov had made allegations of misconduct against SPD Officers. He said "Yes. Yeah, she's...she told me...she came in and told me on April 26th of 2018 that one of our advisors for the CO-OP Program was out drinking with another CO-OP." Sgt. Huddle told me the Officer was identified as Officer Julian Cedenio, and the CO-OP was identified as Kaliegh Hosier. He said Hosier was 21 years of age at the time of this incident, and according to Bogachov she wasn't consuming alcohol, rather she thought Hosier's conduct towards Cedenio was inappropriate. I asked Sgt. Huddle if there was an SOP with the Officers involved in the CO-OP program to not engage in conduct like this. Sgt Huddle stated "We tell them it's not forbidden, but it's very much...told them that they should not, you know get involved socially with officers." I clarified and asked if he speaks to the officers, and he stated "no." I asked Sgt. Huddle if he had heard of any allegations of misconduct involving Bogachov. He said "And this is only something she had told Susan in our office. She said that officers had bought her alcohol before she was 21. Instead of bought, supplied." When asked, Sgt. Huddle wasn't able to identify the accused officers, or give a date to the allegation. I asked him when he heard the allegation, and he said "That was after the fact. I mean, Susan had mentioned that to me a long time after she had talked to Anya." Sgt. Huddle confirmed Bogachov was still a CO-OP when he heard this allegation of misconduct.

I asked Sgt. Huddle if he followed up on that information with Bogachov. He responded "No. No, I tried to leave most of that stuff to Deanna Storch as her advisor. I do know that...who was it? Susan, Davida and Deanna had a talk with Anya. When she came into our office at one time, she was talking about personal things about officers and they all advised her against, you know, you know keeping it professional, not personal out in the car." I then asked if Officer Cedenio had been spoken with about having what possibly could be viewed as an inappropriate relationship with a CO-OP. Sgt. Huddle told me "Yeah, I called him into my office that week

and he was taken off of our advisor list and I had...I told his Sergeant, Tom Lee about the situation. I told him he was an advisor. He's in...sort of in a supervisory position and he was way out of line. "

I re-capped Sgt. Huddle's statement regarding the inappropriate conduct/alleged misconduct saying "Alright, just to recap. The only inappropriate relationship that you dealt with was the one between Ceden and a CO-OP who was already 21. And it was solely inappropriate on the fact that just their job descriptions, not a legal issue of supplying alcohol to someone under the age of 21, but you heard through Susan Llewellyn that Anya had alleged that officers had bought her or supplied her with alcohol prior to her being 21, but you're unsure who those officers may be." Sgt. Huddle replied "that's true, yes."

The final portion of my interview with Sgt. Huddle concerned Bogachov posting onto Social Media in violation of SPD Policy. Sgt. Huddle stated "The only other thing I have with Anya is, is posting stuff online at the academy and she had to have an officer take these and she said Conway was always taking her out there one on one. Where she didn't have a vest on and she's posting SPD property, stuff about SPD online which is against policy, so." I confirmed with Sgt. Huddle the person "Conway" he was referring to was actually Officer Conrath. Sgt. Huddle asserted "he was taking them and allowing her to do what was against policy." I asked him if he knew that for a fact, or if he was "putting the pieces together and to that conclusion." Sgt. Huddle told me Bogachov had told him Officer Conrath had taken her out shooting one on one at the SPD Range, but didn't state Officer Conrath was taking the pictures in question.

Sgt. Wuthrich confirmed with Sgt. Huddle that he had left "supervisory responsibilities to Deanna Storch", to which Sgt. Huddle stated "Uh hmm." Sgt. Wuthrich then asked Sgt. Huddle if Officer Storch was aware of the allegation of Officer providing Bogachov with alcohol, and he stated he didn't know. I followed up that question and asked Sgt. Huddle "So real quick. So when you...when you left that Deanna to deal with when you heard that...through Susan that she had possibly...she had alleged officers had supplied her alcohol. What I have written down is...was you let Storch deal with is as she's the co-op advisor. Did you let her know what the allegation made?" Sgt. Huddle said "I thought she was in on that conversation." I asked Sgt. Huddle if that would have been something he would have let her know if she wasn't in on that conversation, and he said "yeah."

Sgt. Griffin asked Sgt. Huddle a question pertaining to the photographs. He asked "The only question I have is related to the...the photographs that were taken. You don't know that any officer from Spokane PD knew she was posting those or gave those to her with the intent knowing that she was going to post those online, correct?" Sgt. Huddle responded "I'd have to read through some of these. That one's taken on the other side of the state and that's just about Conrath saying they don't have to wear their vests. Yeah, you will have to ask Anya that. I cannot say that for sure." Based on Sgt. Huddle's answer regarding having Officer Storch address a potential criminal issue (officers supplying alcohol to minor CO-OPs) I determined he should be listed as an Accused Officers as opposed to a Witness.

At about 1100 hours I interviewed Susan Babbitt. After serving her Administrative Rights and advising her she was a witness we started the interview. I asked Babbitt if she knew Anya

Bogachov and she said she did. Babbitt said she has known her for 2 years and characterized their relationship as follows "I interacted with her...I was the contact person between the co-ops and the office. So I would be the...the person that they would email with questions, to schedule their ride-a-longs with officers. I issue their equipment, uniform. I asked Babbitt if she would describe their as positive or productive and she said "At times. Sometimes she had come to me with some information where I felt that her behavior was not a professional level and I had to take that to the sergeant." I asked what information Babbitt was referring to, and she said "She had told me that she had been at a party with some officers where there was drinking and it was not something that was a sanctioned work event." Babbitt continued saying Bogachov said she had started playing "mind games" with some of the officers. I asked her what she meant by that and she explained "She had stated that there was a mentor who was interested in her on a personal basis and asked why she wasn't riding with him. She told him she couldn't ride with him because he was a mentor and so he dropped out of the mentor program and then said well you're still not riding with me and she said well I can't ride with you you're not a mentor anymore and was laughing about it when she..." I asked Babbitt if she knew which mentor Bogachov was talking about, and she told me "Brandon Lynch." I asked Babbitt if Bogachov had indicated she had been drinking (alcohol) and she said "she said she did." As we continued to talk about this party Babbitt said she didn't realize at the time Bogachov was telling her this that she was under 21 years of age. She said the party occurred towards the end of the summer of 2017. Babbitt said when she realized Bogachov wasn't 21 at the time of this party she notified Sgt. Huddle. She said that occurred in April or May of 2018. Babbitt didn't know how Bogachov obtained the alcohol at that party. Babbitt had a modicum of information regarding Bogachov posting pictures onto Social Media that indicated she was at the Spokane Police Academy.

I asked Babbitt if Bogachov ever indicated she and Officer Lynch had a relationship outside of work. Babbitt said "No. She said he was interested, but she never went on to say that they were involved in a relationship. At the time that she was talking about that, I brought this up to Officer Deanna Storch who is the advisor for the group. [Unintelligible]." I confirmed with Babbitt she told Officer Deanna Storch about the party is 2017 and she stated "I did and I told her that at that point I kind of felt some mentoring would be beneficial for her to explain that it's a professional environment. We shouldn't be, you know involved outside of work. Deanna Storch, Caitlyn Anderson and myself all did have a talk with Anya about that." I confirmed with Babbitt this conversation with Bogachov happened about two months after the party, which would make it mid Fall of 2017. Babbitt stated again she didn't mention this to Sgt. Huddle until April or May of 2018, which was when she realized Bogachov was underage. Babbitt said another incident occurred and said it involved CO-OPS and an Officer going to a Casino. I asked her to tell me about that and she said Bogachov contacted her in the end of April beginning of May 2018 telling her she and another CO-OP Kaleigh Hosier had been at the Northern Quest Casino with Officer Cedeno. Babbitt told me Bogachov said she hadn't been drinking, but she thought Hosier's flirtatious conduct towards Officer Cedeno was inappropriate. I asked if Bogachov had alleged any misconduct on Officer Cedeno's part, and she said no. Babbitt confirmed Sgt. Huddle had spoken to Hosier about her behavior regarding Officer Cedeno. Babbitt stated she told Officer Storch about the party involving Officer Lynch, and recommended she (Officer Storch) mentor Bogachov concerning having professional relationships. I asked Babbitt when that occurred, and she said January of 2018. I asked if

Bogachov was receptive to the counseling session and she replied "No, not at all. We spoke with her about this being a teaching environment that it wouldn't be appropriate to be hanging out with the officers. She came back and told Deanna and Caitlyn that they really didn't have her in to talk to her because they were both married to officers. We spoke for about approximately 45 minutes to an hour with her and at the end all she said is "I don't know why women don't like me?" And then she left, upset.

I asked Babbitt when Bogachov was removed from being a CO-OP if she heard her make any statements like she had a list of officers she could take down with her. Babbitt told me she had heard that, but after further discussion Babbitt never heard Bogachov say that, rather it was more of a rumor. She said she got the information second hand from CO-OP Sarah Brazier.

Sgt. Wuthrich asked Babbitt if she knew why Bogachov was removed from the CO-OP program, and she said "For consistently not following procedure."

At about 1453 hours I contacted Anna Bogachov via telephone. I asked her if she was going to attend the interview I scheduled with her for the next day. She told me she had class and couldn't attend. She added she had responded to my original email on 2/21/19 advising me of the schedule conflict. I asked her if she wanted to re-schedule the interview and she was hesitant. Bogachov asked me if she had to be interviewed, and I explained to her since she was no longer an employee of SPD she was not mandated to participate in the interview. She told me she could contact me in about 24 hours and advise me what her decision was.

On 3/6/19 at about 1300 hours I sent Officer Lynch and Officer D. Storch a Response Request for an interview. Officer Lynch came to my office in plain clothes at about 1530 hours wanting to talk about the reason for the interview. I explained to him the broad allegation. I asked him if he wanted to conduct the interview once he was on shift at 1600 hours and he agreed. I told him I would contact his Guild Representatives and advise them of the short notice on the interview.

At about 1600 hours Officer Lynch was at the I.A. Conference Room accompanied by Sgt. Griffin and Officer Honaker of the Spokane Police Guild. After giving Officer Lynch his Administrative Rights form we began the interview. I asked Officer Lynch if he was or had been a CO-OP Mentor or Advisor and he responded "For a very brief time." I then asked when, and he told me "at the very beginning of my career, it was kinda a loose term they didn't have anybody and said 'hey would you do it'. I think I went to one meeting and said ahh.. it's not for me." Officer Lynch estimated that occurred in 2015 or 2016. I asked Officer Lynch if he knew Anya Bogachov, and he said he did. I asked him in what capacity and he said "she was a CO-OP here, she rode along with me 1 time, probably 2 years ago in that time frame." I asked Officer Lynch if he had attended any off duty social functions with Bogachov, and he replied "I have not." I asked if he had ever seen her intoxicated and he said "I have not." I then asked Officer Lynch if he had provided Bogachov alcohol prior to her being 21 years of age and he stated "absolutely not." When asked, Officer Lynch didn't know of any officer who had provided Bogachov alcohol when she was underage. I asked Officer Lynch if he had posted any images of Bogachov wearing a SPD uniform or at a SPD Facility onto Social Media, and he replied "I have not." Officer Lynch stated he wasn't aware of any other SPD Officers posting information linking Bogachov and SPD on Social Media. That concluded my interview with Officer Lynch.

On 3/10/19 Officer Storch emailed me stating she would be unable to attend her interview scheduled for 3/12/19. I rescheduled that interview for 3/19/19 at 1000 hours.

On 3/15/19 at about 1056 hours I emailed Bogachov to determine if she was willing to be interviewed. She emailed me back at about 1425 hours on 3/15/19 stated she was declining to be interviewed because she "was not comfortable coming in for a voluntary interview while not permitted to know the subject matter for which I'm being questioned."

Based on her response I wanted to ensure she knew what the investigation was concerning, so I emailed her back stating "I'm sorry if there was confusion surrounding why I wanted to interview you. The allegation is you had an inappropriate relationship(s) with Spokane Police Officers. My questions will be pertaining to that topic. In light of this if information please let me know if you change your mind about participating in an interview." Bogachov responded on 3/16/19 at about 1503 hours saying "Thank you for the information. I'm sorry if it is an inconvenience for you, but I maintain that I do not wish to participate in an investigation that stems from such baseless allegations. I view this only as a malicious attempt by someone to tarnish my reputation, and damage my chance for a career in law enforcement"

Bogachov will not be interviewed for this investigation based on the following factors; she is no longer affiliated with the Spokane Police Department, therefore I can't compel an interview and based on my phone and email conversations with her she is refusing to be interviewed.

On 3/19/19 at about 1000 hours Officer D. Storch arrived in the I.A. Office for her interview. I served her Administrative Rights to her and began the interview. I asked Officer Storch if she was associated with the CO-OP program during 2017-2018, and she said yes. She described her role as the "lead advisor." I asked Officer Storch if she knew Anya Bogachov, and if yes in what capacity. She said "yes", and told me "she was one of my CO-OP's." Officer Storch said she knew Bogachov on a solely professional level. My next question for Officer Storch was if she had hear of any SPD Officers interacting in an off-duty social setting with Bogachov or any other SPD CO-OP. Officer Storch replied "just what Anya would talk about." I asked what would Anya talk about. Officer Storch said "umm.. just the numerous officers she was friends with." I asked in what context "friends" was being used. She replied "umm...I'm trying to think specifically ...ah.. she just, she knew many officers from all the ride alongs she went on, and she just knew a lot about them, umm..that's more I guess specifically that I know of from her is that she said to me, you know other than hear say from what other people had told me." I asked Officer Storch if she had heard of any SPD Officers supplying alcohol to Bogachov or any underage SPD CO-OP's. Officer Storch said "only hear say." I asked her what she heard, and Officer Storch responded "umm.. Susan, I cannot give you a timeline, I thought about it and I don't know when it was at some point mentioned to me that Anya mentioned to her that she had been at a party and alcohol had been mentioned, umm..at being at the party and I can't say for certain if Susan said she was given alcohol or if there was alcohol at the party but there was SPD Officers there or one officer there um at the party." I asked Officer Storch if a specific officer was mentioned. She told me "I can't be specific, I thought the name was Lynch but I can't be specific, like I say there is, she's mentioned so many names of officers that she has associated with I can't honestly say for sure that was the name or not, but that's the name that sticks in my

mind but I can't, I can't say for certain that that's the name that I think." I then asked Officer Storch if she reported any information to a supervisor involving inappropriate behavior between SPD Officers and CO-OPs that would bring discredit to the agency. Officer Storch said "I don't know if I necessarily, report it because Huddle is the supervisor I don't know if I directly reported it to Huddle, or if we had a conversation about it, umm., but we've had a lot of conversations, Huddle and I have had a lot of conversations so I can't, I can't verify if I reported it to him or not." I followed up by asking if she would consider it "shocking" to hear allegations that an Officer was supplying alcohol to an underage CO-OP. Officer Storch said "yes.:" I continued by asking if it would be normal for her to report "shocking" information such as that to someone and she said "yes." I then asked Officer Storch if she was ever asked by Sgt. Huddle to address concerns of inappropriate conduct between Officers and CO-OPs to include Bogachov. Officer Storch responded "I don't believe so." I asked Officer Storch to her knowledge why Bogachov was removed from the CO-OP program. Her response was "numerous policy violations." I asked if any of those policy violations included officers and Officer Storch replied "No, they were blatant policy violations, on.. going to calls that were officer safety issues." I summarized Officer Storch's statement by saying Bogachov's removal from the CO-OP program was a result of Bogachov's intentional violations of policy that didn't involve other officers. Officer Storch said "correct." I confirmed with Officer Storch the allegations regarding inappropriate conduct involving SPD Officers and Bogachov was 2nd and 3rd hand information and that Bogachov never told her about any of the allegations. Officer Storch stated "correct." That concluded my questions for Officer Storch.

Sgt. Griffin asked Officer Storch if she and Sgt. Huddle had an open line of communication. Officer Storch said "yes." Sgt. Griffin then asked if there was anything she would know that Sgt. Huddle wouldn't know, and Officer Storch stated "no." Sgt. Griffin then stated if she had been brought an allegation like above, based on her open line of communication with Sgt. Huddle she would have notified him. Officer Storch stated "correct."

On 3/20/19 I emailed CO-OP Brazier a Response Request setting up an interview for Tuesday, March 26th at 1100 hours. The interview was later changed to 1130 hours on 3/26/19.

On 3/26/19 at about 1125 hours CO-OP Brazier was present for her interview. Present in the room with us was Sgt. Wuthrich, Sgt. Griffin and Officer Honaker. After serving Brazier her Administrative Rights we started the interview. I asked Brazier if she knew Bogachov, and if so to explain their relationship. Brazier said "yes: and explained the nature of their relationship as "Um.. We were friends at the beginning of her time in the program and then I kinda moved away from it and cut off communication outside of CO-OP stuff." Brazier estimated Bogachov started the CO-OP program in November of 2017. I asked Brazier when she cut off her friendship with Bogachov, and she said "within 6 to 9 months of that." I asked Brazier if there was a reason whys he cut off her friendship, and she replied "it was kinda becoming apparent some of the stuff she was doing as part of the CO-OP program and I didn't want it to impact my career later down the road." I asked "what was she doing", and Brazier's response was "I felt that her relationship with some of the officers was inappropriate and it moved in to policy violations with our manual, policy manual." I asked Brazier if she had any knowledge of Bogachov being supplied alcohol by any SPD employee before she was 21 years old. Brazier responded "I heard, she told me that it happened but I don't know any other information about it." I asked Brazier if Bogachov

indicated a specific officer, and she was she wasn't able to remember. When asked if she remembered when this happened, Brazier said she "Um.. I think it was pretty close to when she started in the program, but I'm not a 100% sure." I asked Brazier if she had any knowledge of Bogachov being romantically involved with any SPD employee while she was a CO-OP with SPD. Brazier said "Ah.. somewhat." I asked Brazier if she had specific information on that, and her reply was "Um.. she told me ah.. pretty shortly after she entered the program, um..that she made out with an officer after their shift, ah..one night. I'm not sure 100% what the date was , um.. but it was pretty shortly into her program." I asked if Bogachov indicated which Officer, and Brazier replied "yes". I asked who it was and she responded "Chris Conrath." I asked Brazier if she heard Bogachov make any statements when she was terminated about revealing misconduct of SPD Officers and she answered "no." I asked why Bogachov was terminated as a CO-OP and she said "for repeated policy violations." I asked if the policy violations were consistent with responding to unauthorized calls, adhering to the ride along policy and Brazier said " yeah uh.. She also posted stuff on social media in our building and at the range um.. after being told not to." I asked if she had any knowledge of SPD Officer posting pictures of Bogachov on social media for her or at her request. Brazier told me "um.. I know that officers took pictures of her that she put on her page, but I don't know about on their pages." I restated me question asking Brazier if she had any information that would indicate officers who took pictures of her did so with the intent of putting them on social media. Brazier responded "I don't believe so." I asked Brazier if there were any other inappropriate relationships she knew about involving Anya, and she said "Um..not really it was mostly just with Conrath." I followed up by asking if anyone had any more information regarding the relationship with Officer Conrath. Brazier stated "With him and her?" I said yes, and she continued saying "I know that they went to the range a lot, the two of them. Um she told me that he gave her a gun, I'm not sure if she ended up giving him money for it but she made it sound like he was gifting it to her. Um I know they had a training, they were sharing a coffee which isn't a big deal but it seemed a little odd to me..those were the big stuff."

Sgt. Wuthrich asked Brazier if she had heard the information regarding Bogachov and Officer Conrath from anyone else, and she answered "no." He then asked her if she had any reason to doubt the information she gave her. Brazier said "no." Sgt. Wuthrich followed that questions by asking Brazier if she has had a situation with Bogachov where she (Bogachov) was untruthful, and Brazier said "sometimes she can tend to make stuff sound more exciting than it actually is, um.. but I don't, I don't think it was the case in this situation."

I asked Brazier when the incident with Officer Conrath and Bogachov happen, and Brazier estimated it was within the first year Bogachov was in the CO-OP program. Following up on my question, Sgt. Wuthrich as Brazier if she reported that relationship to anyone, and Brazier said "no."

On 3/28/19 at about 0745 hours I spoke with Sgt. Huddle about getting the ride along records for Bogachov during her tenure as a CO-OP. Babbitt was able to produce those all the ride along records for all CO-OPs and began the process of narrowing down data to show when Bogachov rode and with whom. I also asked Sgt. Huddle to query his records to find out what dates Officer Lynch was a CO-OP mentor. Sgt. Huddle told me he didn't have any record of Officer Lynch being associated with the CO-OP program. After reviewing the ride along records I determined

Bogachov rode with Officer Conrath a total of 16 times in 21 months. During the same time Bogachov rode with Officer Lynch 1 time, and Officer Cedeno 8 times. A calendar based schedule showing exact months/days is included as a separate document.

At about 1604 hours on 3/28/19 I interviewed Officer Conrath. Sgt. Wuthrich was present as well as Officer Honaker. I asked Officer Conrath what his assignment was during the time frame of 2017-2019 and he said Power Shift Patrol. He wasn't sure as to which exact team during those years. I asked Officer Conrath if he knew former SPD CO-OP Anya Bogachov, and he responded "I do." I asked if he knew her on a professional, personal level or both. Officer Conrath said "Both." I asked him to explain and he stated "Anya began as a CO-OP, she's a college student at Eastern Washington University, started as a CO-OP, she was assigned to me as her first mentor. At that time, for a brief period of time I was a mentor to the CO-OP program. Um, she happens to live a block away from my mother, so Anya is separated from her family and friends who live on the west side of the state so I put her in contact with my mom if she were to need anything. Um, over the course of all this time I've given her parents tours of our training facility, come to know them both, ah.. her, she's, we developed ah I guess a friendship throughout that time. She tutors my son in Algebra, cause she does that for the college that was her job. So I took advantage of that when she offered. Um...I know Anya." I followed up by asking Officer Conrath what the "First Mentor" in the CO-OP program mean, and he told me "When she was brand new ah.. they assigned her to me for a ride along." I asked Officer Conrath if he was the only person she would ride with, and he said "No, no no, I think I was the first person she did ride with....to my knowledge...I think she was brand knew I met her for the first time in the roll call room." I then asked Officer Conrath how many time he thought Bogachov had ridden with him as a CO-OP (Officer Conrath said she never rode with him as a civilian rider). Officer Conrath said "a handful...I'm not certain I would, in the area of 4 or 5 times." I asked Officer Conrath if it would surprise him if the number of ride alongs between March of 2017 and January of 2019 was 14-15 times. I further explained to him I got these numbers by pulling the data from Volunteer Services. Officer Conrath replied "Ah..that does surprise me a little bit, she hasn't ridden with me in quite a long time." I explained the majority of the rides were in the 2017 2018, to which Officer Conrath said " Okay, well, it's a little surprising to me so my estimate was clearly off." I continued by telling Officer Conrath an allegation had been made that he and Bogachov had "made out" at the conclusion of a shift. I asked Officer Conrath if that was true and he answered "absolutely not." I then asked if he has or ever had a romantic relationship with her, and Officer Conrath's response was "no." My next question was if he had posted any pictures of Bogachov onto Social Media that identified her as an SPD employee, or showed her location to be at a SPD facility. Officer Conrath responded "Have I posted pictures of her no, no." I asked Officer Conrath if he fully understood the question, and he said "you are asking me if I posted to Social Media on her behalf pictures of her representing the department?" I asked yes, and Officer Conrath replied "no."

At this point in the interview I asked Sgt. Wuthrich if he had any questions, and he said he didn't. Officer Honaker re-confirmed Officer Conrath's answer that he hadn't posted anything for Bogachov onto Social Media. When Officer Conrath answered Officer Honaker's question he admitted to having an Instagram Account, but again denied about posting any police related images of Bogachov onto Social Media.

I then asked Officer Conrath if he had any knowledge as to why someone would allege he had "made out" with Bogachov. Officer Conrath responded by saying "Well I have a feeling that I know where this came from. Um, there's a particular CO-OP who I think is instrumental in having Anya terminated from the CO-OP program. Um, CO-OP Brazier, ah.. for whatever reason I know that she and Anya had a friendship at one point in time and I guess there was a falling out. Um, I think that, and ah.. past that it would be pure speculation to why but for whatever reason Sara made it her project to ah, destroy this young girl and her potential career and I have no idea why she may have decided to include me in this. So, I have no clue where this could have come from, it's absolutely untrue and unfounded. I've been through a lot these last few years starting about 4 years ago and if there is anybody who is keeping their nose clean it is me. The last thing I am going to do is engage in a relationship with a member of this department, an inappropriate relationship. This, this gal Anya is, is my friend and I do, I do talk to her once in a while. Anya had Thanksgiving dinner at my mother's house this year because her family was out of town and she was by herself so my mom invited her over. You know so.." I asked Officer Conrath if it would be fair to characterize his relationship with her as that of a mentor and he said "initially ya a mentor. I tried to counsel her through this process and navigate the politics and difficulties of getting into police work. Um, maybe I have failed her in that cause she's in a bad spot now, um so, so ya she's looked to me as a mentor. Ya, I think I mean I've met her, her parents they've kind of, they know me a little bit I talk to them once in a while they kinda, they'll contact me once in a blue moon to ask how's she doing things like that. So, um I'd characterize it more as a family friend at this point in time. She, she knows my mother, my wife, my kids. That's more along the lines of how I would characterize our relationship. That answer concluded the interview at 1615 hours.

At the conclusion of this interview I reviewed the list of persons who were identified in this investigation. The only two persons I didn't interview were Officer Cedeno and CO-OP Hosier. I decided not to interview them for the following reasons. The alleged misconduct wasn't criminal as both she and Officer Cedeno were at least 21 years old. Additionally, Sgt. Huddle had addressed Officer Cedeno's conduct with him and Sgt. Lee, and sanctioned him by removing him as a CO-OP Advisor. CO-OP Hosier wasn't spoken to because based on Sgt. Huddle's statement "We tell them it's not forbidden, but it's very much...told them that they should not, you know get involved socially with officers" CO-OP Hosier didn't violate any policy, and according to Babbitt Sgt Huddle had spoken with Hosier about this incident.

SPOKANE EXHIBIT 21

From: Meidl, Craig <cmeidl@spokanepolice.org>
Sent: Thursday, January 21, 2021 8:45 PM
To: Pearson, Kelsey <kpearson@spokanecity.org>
Subject: Chris Conrath passover

Kelsey

Per our conversation, I am going to pass over Cpl' Chris Conrath, who is next up on the Sergeant's list, for cause.

Based on behavior five and a half years ago, in which discipline was administered, and the learning of inappropriate behavior six months ago regarding similar inappropriate behavior that paralleled the other behavior five and a half years ago with a different female (the most recent behavior has 2 sustained allegations, and 2 allegations with insufficient evidence to sustain but likely occurred according to the ARP review), further complicated by at least 4 other complaints (within the past two years) involving different females that weren't substantiated but indicate a disturbing pattern, prudence indicates he should not be promoted to a Sergeant's position.

Respectfully,

Craig Meidl

SPOKANE EXHIBIT 22

The Kuhlman Law Office, PLLC.

Joseph W. Kuhlman

Owner

1408 W. Broadway Ave.

Spokane, WA 99201

509.904.0500

joe@kuhlmanoffice.com

Tuesday, January 26, 2021

Re.: Cpl. Conrath, Chris


To Whom it may Concern:

Cpl. Chris Conrath request, via undersigned counsel, request an appeal thought the Chief Examiners office of the "pass over for cause" as it violates Spokane Police Department Policy 1020.2.3(d) on pg. 508-509 of Spokane Police Departments Manual dated 10/09/2019.

Thank you.



-Joe Kuhlman

 The Kuhlman Law Office
1408 W. Broadway Ave.
Spokane, WA 99201
509-904-0500

SPOKANE EXHIBIT 23



Spokane Municipal Code

[Home](#)[Title 04](#)[Chapter 04.32](#)[Section 04.32.020](#)[Highlight Word](#)

Title 04 Administrative Agencies and Procedures

Chapter 04.32 Office of Police Ombudsman (OPO)

Section 04.32.020 Definitions

- A. "Chief" means the chief of the Spokane police department.
- B. "Commission" means the office of police ombudsman commission.
- C. "Complainant" means any person who files a complaint against any commissioned member of the Spokane police department.
- D. "Complaint" means a complaint by any person of alleged police misconduct.
- E. "Designee" means a commissioned member of the Spokane Police Department.
- F. "Finding" means a conclusion reached after investigation.
- G. "IA" or "internal affairs" means the Spokane police department's investigative unit, whose responsibilities and procedures are described in the Spokane police department's Policy and Procedure Manual, as amended from time to time, to receive and investigate allegations of misconduct by Spokane police department employees.
- H. "Material to the outcome," "material statement," and "material fact" are those facts, evidence, or statements which tend to influence the trier of fact because of its logical connection with the issue. It is a fact which tends to establish any of the issues raised by the complaint or the defenses to the complaint.
- I. "Mediation" means a private, informal dispute resolution process in which a neutral third person, the mediator, helps disputing parties to reach an agreement. The mediator has no power to impose a decision on the parties.
- J. "Member" means a sworn employee of the Spokane police department about whom a complaint has been submitted to the Spokane police department or the OPO.
- K. "Misconduct" means conduct by a member during an encounter with a citizen, which conduct violates Spokane police department policies, procedures and/or canons of ethics.

- L. "OPO Involved Investigation" means an IA investigation where the complaint giving rise to the investigation, whether made to the police department or the OPO, is a complaint of a serious matter (complaints that could lead to suspension, demotion or discharge) involving allegations that an employee either improperly used force or improperly/inappropriately interacted with citizens.
- M. "Policy-related issue" means a topic pertaining to the Spokane police department's hiring and training practices, the Spokane police department's policies and procedures, equipment, and general supervision and management practices, but not pertaining specifically to the propriety or impropriety of a particular officer's conduct.
- N. "Serious matter" means any complaint that could lead to suspension, demotion, or discharge.

Date Passed: Monday, February 10, 2014

Effective Date: Wednesday, March 26, 2014

ORD C35069 Section 2

SPOKANE EXHIBIT 24

Conrath, Christopher

From: erika roundtree <holler@hollerholler.net>
Sent: Tuesday, September 08, 2015 11:48 PM
To: Conrath, Christopher
Subject: Re: Thank you!

im so sorry. I wash the number off my hand . Can you call me again? Sorry my bad Yaya

From: Conrath, Christopher <cconrath@spokanepolice.org>
Sent: Tuesday, September 8, 2015 12:54:14 PM
To: erika roundtree
Subject: Re: Thank you!

Yaya,

I am flattered. I think that you are a very nice girl. I am happy to help you in any way that I can, especially when it comes to keeping you and your family safe. I need to make it perfectly clear though, that any interaction outside my professional capacity would be inappropriate. I hope you understand.

Chris Conrath

> On Sep 8, 2015, at 04:25, erika roundtree <holler@hollerholler.net> wrote:

>

> I have to tell you. I can't stop thinking about you

>

>

From: Conrath, Christopher <cconrath@spokanepolice.org>

> Sent: Tuesday, September 8, 2015 3:40:05 AM

> To: erika roundtree

> Subject: Re: Thank you!

>

> You're very welcome!

>

>

>

>> On Sep 8, 2015, at 03:18, erika roundtree <holler@hollerholler.net> wrote:

>>

>> Hey

>> I want to say thank you thank you

>> Have a good night at work.

>> Yaya

>> 990-7999