

CITY OF SPOKANE ETHICS COMMISSION

ETHICS COMPLAINT FORM

A complaint must be in writing, submitted on this form, and it must describe the allegations with sufficient detail to enable both the Commission and the person who is the subject of the complaint to reasonably understand the nature of the complaint. The complaint must also be signed, dated, and filed with the City Clerk's Office, and it must include a statement indicating that, to the best of the person's knowledge, information, and belief formed after reasonable reflection, the information in the complaint is true.

When you have completed this form, submit it to:

Office of the City Clerk
808 W. Spokane Falls Blvd.
Spokane, WA 99201-3342
clerks@spokanecity.org
509.625.6350

****Please be advised that the completed complaint form is a public record pursuant to the Washington State Public Records Act, Chapter 42.56 RCW and will be filed with the City Clerk's Office, posted on the Ethics Commission's website and provided to the person who is the subject of the complaint as well as any other individual making request for a copy of the complaint. The Ethics Commission's review of the complaint will occur in a meeting open to the public. ****

Pursuant to the City of Spokane's Code of Ethics, I am filing a complaint regarding conduct which I believe constitutes a violation of the City's Code of Ethics.

Name, position, and department of person(s) I believe to have violated the Code of Ethics:

Name: Bart Logue

Position/Title: Spokane Police Ombuds

Nature of Code of Ethics violation:

What specific provision of SMC 1.04B.050 do you believe has been violated?

H. Commission of Acts of Moral Turpitude or Dishonesty Prohibited.

Describe in as much detail as possible the alleged Code of Ethics violation conduct. Attach additional sheets of paper, if necessary. Please include all documentation you believe demonstrates a violation. Your description should include the date, location and frequency of the alleged violation.

The complaint is amended to this document. I learned of this violation in Jan. 2025, but
I was first aware of a major failure of the office on Aug. 26th 2024, the day Police Chief
Hall was sworn in. The failures may be systematic and ongoing.

Names and positions of the persons who may have witnessed the event:

Internal affairs members Sean Wheeler, MJ Rose, David Singley.

Possibly members of the Office of the Ombuds would have been aware.

Evidence or documentation

Please list any evidence or documentation that would support your allegation of a Code of Ethics violation. Indicate whether you can personally provide that information.

Evidence is contained in the case file C24-046, which is can be made available. It contains
BWC footage. The relevant portions were transcribed and included in the complaint.

Complainant Declaration

I declare under penalty of perjury of the laws of the State of Washington that to the best of my knowledge, information, and belief formed after reasonable reflection, the information in the complaint is true and correct.

Evan Sims

Complainant's Signature

May 4th 2025

Date

Date and Place (e.g. City, State)

May 4th 2025

Name (please print): Evan Sims

Address: 4521 S. Woodruff, Spokane Valley WA, 99206

Phone Number(s): (509)230-8594

E-Mail Address: wx3@msn.com

Formal Complaint and Report of Moral Turpitude and Deception, Re: Bart Logue

This document serves as a formal complaint and report of acts involving moral turpitude, deception, and misconduct. This report pertains to incidents including physical assault with intent to cause injury, perjury in sworn police reports, and the concealment of these acts through omissions and false statements. These are defined acts involving moral turpitude. These acts harmed my physical well-being, reputation, and civil liberties. Bart Logue demonstrated willful alignment with institutional deception in this case and was an accessory to acts of moral turpitude, which is an act of moral turpitude in itself. He confirmed that those seeking justice for unprovoked violent assaults should be considered “ankle biters.” I demanded that this false confession be corrected, but this was instead met with denial and deception. The truth was captured on BWC footage. Any concept one has that he is really fighting against police misconduct is disproven by his willful negligence and this abject failure of basic oversight. In this case, he was not simply negligent, but endorsed blatant misrepresentation of material facts and allowed the suppression of evidence. This is a clear violation of the City of Spokane Code of Ethics.

M. Commission of Acts of Moral Turpitude or Dishonesty Prohibited - No City officer or employee shall commit any act of moral turpitude or dishonesty relating to their duties or position as a City officer or employee or arising from business with the City. Conviction of a felony or a misdemeanor involving moral turpitude or dishonesty, the nature of which demonstrates lack of fitness for the position held, shall be considered conclusive evidence of a violation of this Code of Ethics. Demonstrated acts of moral turpitude or dishonesty are not limited to felony or misdemeanor criminal convictions.

My case should have been a litmus test for the effectiveness of his office. I had been falsely accused of wrongdoing in some sort of malicious prank where I was suffered substantial bodily harm which still requires surgery. I determined that there was direct evidence that proved my case. All I needed to do was to have a truthful police report taken that documented my injuries and requested the video evidence. Given that the assailant had made false statements to 911, the surveillance video would prove my case that they had lied about this event in essentially all aspects. My story was literally true and no video could prove otherwise. It was essentially necessary that the assailant delete the tape as it showed a preplanned 2nd degree assault. Instead of obtaining the surveillance video, Officer Craigen wrote a misleading police report. This report essentially omitted all of my statements refuting any wrongdoing and instead contained a false confession. My motivation for filing my complaint against him was to remind him that not all 911 calls are true and not all dispatch communications are accurate. This is relevant to his involvement in yet another police homicide. In my case, he refused to even consider my innocence based on the fact that a false report had been made to 911. This speaks to his inability or willingness to consider or assess actual facts or unbiasedly assess a situation.

This constitutes not merely a failure of procedure. It is a denial of due process and equal protection under the law. When a constitutional right is contingent on one's social standing, political vulnerability, or perceived developmental disability, it ceases to be a right at all. In the shadow of the Otto Zehm case—a tragic and deeply shameful chapter in Spokane's history—this pattern of suppression, obfuscation, and institutional self-protection cannot be dismissed as mere error. That event and cover-up shocked the

conscience of the people of Spokane such that they overwhelming voted in favor of independent police oversight.

When I received a letter stating that there was no evidence and my complaint unfounded, I was completely shocked. After a significant period of time, I was able to receive the investigative report. The surveillance video had been suppressed and deleted. This was predicted in a supplement to my police report, but that report was not reviewed. My report stating my side of the story was missing in its entirety and has apparently been deleted from the records department. No effort was made to obtain this document and a straw man argument that police reports do not need to be verbatim was used instead. Apparently no test of the accuracy of the investigator's review of the BWC footage was performed. My complaint was based on transcripts that I had made with direct evidence supporting my claim. Checking this information is imperative. By justifying the false reporting by claiming police reports "need not be verbatim," even though the false statements altered the material substance of the allegations, this basic check was not performed.

While verbatim accuracy is not required in police reports, truthfulness is and required by law, especially when reporting statements made by a suspect or witness. When a statement is transformed from an explicit denial into a confession, it ceases to be a paraphrase and becomes a fabrication. This isn't a case of imprecise wording or reconciling conflicting accounts, this was a blatant case of intentional misconduct. This finding was made after reviewing a very clear denial "No, I didn't do anything" followed by the challenge "Let's see that on video" with the knowledge that the video evidence was deleted. This is absolutely shocking deception.

Definition: TRUE AND ACCURATE means, as to any information, that such information is true and accurate in every material respect on the date as of which such information is dated or certified and such information is not, or shall not be, as the case may be, incomplete by omitting to state any material fact necessary to make such information not misleading.

The City of Spokane Office of Police Ombudsman has adopted the National Association for Civilian Oversight of Law Enforcement Code of Ethics (NACOLE). It includes two tenets that were flagrantly violated.

Independent and Thorough Oversight

Conduct investigations, audits, evaluations and reviews with diligence, an open and questioning mind, integrity, objectivity and fairness, in a timely manner. Rigorously test the accuracy and reliability of information from all sources. Present the facts and findings without regard to personal beliefs or concern for personal, professional or political consequences.

This tenet was clearly violated. No test of the accuracy of the information was performed. An explicit denial and challenge for proof was very clearly stated. The statement could easily be verified upon review.

Respectful and Unbiased Treatment

Treat all individuals with dignity and respect, and without preference or discrimination including, but not limited to: age, ethnicity, citizenship, color, culture, race, disability, gender, gender identity, gender expression, housing status, marriage, mental health, nationality, religion, sexual orientation, socioeconomic status, or political beliefs, and all other protected classes.

To falsely attribute an act such as “ankle biting” to a supposed developmental disabled person is a dehumanizing indignity. It reduces a vulnerable individual to a caricature, invites ridicule, and legitimizes their mistreatment. Such language, especially when fabricated and repeated, amounts to institutional abuse, where those least able to defend themselves are discredited by those charged with their protection.

This false attribution not only stripped me of my dignity but effectively silenced my credibility. The assignment of behavior that is infantile, disruptive, and aggressive to someone already stigmatized by their disability is not merely inaccurate—it is profoundly unethical. It is a textbook case of confirmation bias weaponized against the vulnerable, in violation of any meaningful code of fairness or respect for humanity.

In this context, dignity is not an abstract principle; it is a right—recognized in the standards of care and professional ethics that govern public officials and oversight authorities. Its denial in this case amounts to an act of moral turpitude. The idea that this complaint, backed by evidence, is unfounded is defamatory to my character and an affront to my dignity.

A critical element of this complaint to the Ombudsman office involves the suppression and mischaracterization of exculpatory statements made by the complainant. Multiple denials were issued in response to the officer's accusations, including the explicit statements, “I didn’t even see this person” and “They are saying that I made all of these calls and made threats on the phone, but that is all false.” These are direct and unambiguous rejections of the alleged conduct. Rather than accurately documenting these denials, the reporting officer paraphrased them merely as the complainant being “upset with the account.” An then followed with the false admission that I had been biting Timothy’s ankles.

This mischaracterization is not a unbiased summary—it actively diminishes the legal weight of a statement that, under *Brady v. Maryland*, qualifies as exculpatory material. The difference between denying wrongdoing and being “upset” is not semantic—it is legally material. A denial is a declaration of innocence. A claim of emotional response is not.

The omission and mischaracterization of these exculpatory statements, particularly when done by an officer writing under penalty of perjury, rise to the level of misconduct. When this narrative distortion is coupled with the deletion and suppression of the complainant’s written supplement—which reaffirmed those denials and further predicted the deletion of surveillance video—the intent to obstruct becomes evident.

These are material statements and Bart Logue completely mischaracterized the requirements and need for true an accurate police reports. His deception mischaracterized the requirement that police reports

are signed to be true and accurate under penalty of perjury. In my case, the surveillance video that proved my case was found to be affirmatively deleted as I had predicted. No weight was given to this. Garth Craigen had written a false confession instead of a request for the video. This certainly appears to be intentional, but no inquiry was made to his knowledge of this. The Ombudsman's office exists due, in part, to the suppression of surveillance video. In that case, misrepresentation of direct video evidence was used to exonerate an officer until the federal investigation finally exposed the truth.

NACOLE also offers a suggested reading list for those in oversight positions. Several themes are covered that include how lack of effective oversight becomes a shield against what they are meant to protect against and exacerbates the underlying problems. It is my view that official duties of the office were not performed that are paramount to the effectiveness of the office. I have identified the three main failures that are duties of the office.

1. Abdication of Oversight Responsibility

By not questioning the officer who facilitated the false confession, the Ombudsman failed in the most basic function of oversight: to independently and critically review the conduct in question. That silence can be read as willful deference to the institution being overseen. The deception was overt and easily discoverable.

An oversight body that declines to even question the source of a demonstrably false report, particularly when it is central to a citizen's harm, is not functioning as a check on power—it is complicit in that power's abuse.

2. Institutional Preservation Over Public Accountability

It is commonly argued that many oversight structures are more committed to preserving the legitimacy of institutions than uncovering truth. In this view, the refusal to amend a known false report when direct evidence is available suggests a prioritization of institutional image over justice:

When oversight becomes a shield for misconduct rather than a tool for accountability, it ceases to be oversight at all—it becomes institutional fraud.

3. A Deep Betrayal of Justice

Especially in the context of someone who is supposedly developmentally disabled or vulnerable, this failure is not neutral or unbiased. It was my belief that my complaint was very reasonable and backed by direct evidence. The finding of Closed-Unfounded; An allegation of misconduct that is disproven upon initial review. (i.e. BWC footage or other evidence clearly disproves an allegation.) I cannot convey just how betrayed I felt. My side of the story was suppressed and deleted. Officer Craigen's and the investigating officer's deception were easily exposed by a simple review, evidence of which I offered.

To allow a false confession to stand, unexamined and uncorrected, is to endorse it. To do so when it is disproven by video is a betrayal not only of ethics, but of the basic duty to protect

those most in need of protection. Protection against this is essentially why the Ombudsman's office was founded.

Summary of Complaint:

I. Destruction of Exculpatory Evidence

- The surveillance video, which refuted false accusations against me, was actively suppressed by a false report was found to be deleted.
- Supplemental report predicting this and providing evidence was suppressed and/or deleted.
- Exculpatory statement requesting that video on the police report were not corrected.

II. Acts of Moral Turpitude

C. Accessory to Moral Turpitude through Deception

- Oversight officials and police administration failed to correct known falsehoods.
- The Ombudsman declared my complaint "unfounded" despite video evidence proving misconduct.
- Covering up perjury and assault, especially when clear evidence exists, constitutes being an accessory to crimes of moral turpitude.

A. Assault with Intent to Cause Injury

- I suffered broken ribs in two locations, visible bruises, and a lasting elbow injury requiring surgery. I reported and could demonstrate my trouble breathing. I could also demonstrate my inability to even slightly twist. I was unable to perform manual tasks, etc. I could not run.
- The individual responsible intentionally obstructed my safe passage, used force to direct me to an unsafe exit, and weaponized a door against me. This was all reported. I still don't know why this was done to me.
- This violent conduct constitutes criminally negligent assault with intent to cause injury under Washington law.
- The Ombudsman declared there was clearly no probable cause to arrest, when police statements clearly confirm probable cause to search for the video. That search had the probability to discover evidence that a crime had been committed. The Ombudsman knew that this video had video evidence had been found to be deleted. The steward of this video had full knowledge that this was under investigation and had an obligation to preserve this video.

An officer stated, "And there's camera footage to show that to prove or disprove that this happened. That's what we got to do, right? That's part of our job."

This gave a clear indication that there was probable cause to believe that the search would result in evidence that a crime was committed. No weight was given to my story literally being true.

The Ombudsman's declaration, given the overwhelming evidence contrary, was strictly done to obfuscate wrongdoing. Knowingly suppressing exculpatory evidence and misrepresenting a police report to shield a violent offender and obstruct justice is tantamount to rendering criminal assistance under the guise of official authority.

B. Perjury in Official Police Report

- The officer failed to document events in a sworn report that were materially false.
- Clear exculpatory video evidence that refuted the fabricated narrative was deleted.
- The report falsely attributed fabricated actions to me (e.g., swearing, biting, lunging) that the surveillance footage disproves. These allegations were all refuted, but ignored.
- Police reports are sworn under penalty of perjury to be true and accurate. False statements of material fact are subject to (RCW 9A.72.020, RCW 9A.72.030).
- Deliberately concealing or excusing perjury in an official report constitutes accessory conduct to the crime itself, enabling the lie to stand unchallenged and obstructing lawful accountability.

III. Official Misconduct in the First Degree (RCW 9A.80.010)

- A public servant is guilty if:
 - **(1)** *“with intent to obtain a benefit or to deprive another person of a lawful right or privilege,”*
 - (a)** *“he or she intentionally commits an unauthorized act under color of law; or”*
 - (b)** *“he or she intentionally refrains from performing a duty imposed upon him or her by law.”*
- Violation of Constitutional Rights (42 U.S.C. § 1983)
 - Falsifying a confession violates the Fifth Amendment and the Fourteenth Amendment, violating my rights to due process and equal protection.
- Deprivation of Rights Under Color of Law (18 U.S.C. § 242)
 - This federal law makes it a crime for police officers or public officials to willfully deprive someone of their constitutional rights, including fabricating evidence or false confessions. Failure to address a false confession endorses it.
- Conspiracy Against Rights (18 U.S. Code § 241)

If two or more persons conspire to injure, oppress, threaten, or intimidate any person *in any state, territory, or district in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same;*

- Bart Logue and MJ Rose's actions can only be summed up as a conspiracy. The willful blindness to misconduct in this case constitutes moral turpitude. It is a betrayal of the public trust and of the ethical obligations owed to victims of violence and misconduct. An oversight body that defends the indefensible becomes itself an accessory and co-conspirator to the deprivation of rights. My rights were intentionally denied, under color of law, through intentional inaction. Given that the saved surveillance video was found to be blank, and then MJ Rose apparently referred this case for prosecution against me, it can be inferred that this was their combined intention. It is my belief that they erroneously thought they could prove I lied and then covered it up when they found I was telling the truth.
- The retaliatory action is deeply troubling. When an oversight investigator claims to find "no evidence" despite the presence of clear contradictions, exculpatory statements, and suppressed material, and then refers the complainant to a prosecutor rather than investigating the misconduct itself, it raises serious red flags of abuse of power, obstruction of justice, and malicious prosecution.

IV. Degrading and Discriminatory Statements

- A supposedly developmentally disabled individual was confirmed to have admitted to a degrading false confession. This type of rhetoric was apparently used to create an image that dehumanized the victim. This created a moral disengagement so that people can distance themselves from the consequences of their actions through rationalization and denial, making the harmful actions easier to justify.
- Such characterizations, used in a derogatory context to undermine credibility, were cruel and discriminatory.

V. Destruction of Exculpatory Evidence

- The surveillance video, which refuted false accusations against me, was actively deleted.
- This destruction constitutes obstruction of justice and denial of due process rights.

VI. Conclusion

- The acts committed against me include serious violations of law and ethics. Assault, perjury, destruction of evidence, discriminatory statements, and misconduct by oversight authorities together constitute profound moral turpitude and deception.

I request that this report be investigated thoroughly, that those responsible be held accountable, and that my rights as a victim and complainant be upheld according to Washington State law and the U.S. Constitution.

The Ombudsman, entrusted with the independent oversight of law enforcement, failed in their duty in the following demonstrable ways:

- 1. Suppression of a Supplemented Police Report**
- 2. Failure to Investigate a Known False Statement Under Penalty of Perjury**
- 3. Complicity in the Destruction of Exculpatory Evidence**
- 4. Failure to Act on Clear Brady/Giglio Violations**
- 5. Betrayal of the Public Trust and Abuse of Oversight Authority**

VII. Ethical failures of the office:

- Oversight That Mirrors the Misconduct It Oversees Is Itself Dangerous

Given that this is an ethics violation complaint. I will speak some about moral turpitude. Although perjury and assaults with intent to injure are defined as such, some claim that moral turpitude has a requirement of evil and it may be argued that accessory acts are not inherently evil, but this is not the case. They found “no evidence” not because none existed, but because they refused to see what was plainly before them. This deliberate blindness recalls Hannah Arendt’s insight: “Evil comes from a failure to think. It defies thought for as soon as thought tries to engage itself with evil and examine the premises and principles from which it originates, it is frustrated because it finds nothing there.” Here, officials reviewed a plainly false and materially exculpatory confession and saw nothing. Their finding of “no evidence” was not a conclusion drawn from facts or reason. This shocked my conscience because I can apply no logic for the corrections to my report to be denied and it is quite frustrating to find nothing there; there is no meaning or reason for this.

Public oversight mechanisms exist to serve the people, not to insulate the system from accountability. When those tasked with investigating misconduct become apologists for it, the result is not oversight, but subterfuge. The Internal Affairs investigator in this case did not serve as a neutral fact-finder but acted as a firewall to protect an officer who demonstrably falsified a sworn report. This is not an isolated lapse; it reflects a known culture of institutional preservation, one that erodes public trust and compromises the integrity of any prosecution relying on such tainted officers. If the system is unwilling to question itself, it becomes complicit in the very wrongdoing it claims to investigate. Nietzsche warned of this. Overseers of such misconduct must remain vigilant that they do not transform in those they were meant to protect against, for “if you gaze for long into an abyss, the abyss gazes also into you.”

This is a complaint about the moral and ethical failures when oversight authorities abandon their duty. The conduct of the Ombudsman in this matter constitutes willful neglect, obstruction of truth, and a knowing betrayal of the principles of transparency, accountability, and justice.

I request that an independent authority review this matter and determine whether the Ombudsman has violated public integrity and ethics standards and should be referred for a disciplinary investigation. Hopefully this is found to be an isolated incident, but this inaction was so egregious that it speaks to a deeper abdication of moral responsibility.

“The thing I did was this: in long intervals I have expressed an opinion on public issues whenever they appeared to me so bad and unfortunate that silence would have made me feel guilty of complicity.”

-Albert Einstein

Respectfully,

Evan Sims

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