
September 10, 2026

Interim Chief Andre Sayles
Seattle Police Department
PO Box 34986
Seattle, WA 98124-4986

Dear Interim Chief Sayles:

Please see the Management Action Recommendation below.

Case Number

- 2026OPA-0111 / 2026COMP-0004

Topic

- Purchases and Investigative Funds

Summary

- It was alleged that a named employee purchased a camera lens using their personal credit card for investigative work and reimbursed himself using investigative funds instead of the Purchase Order system.

Analysis

- [SPD Policy 1.040-POL-9](#) states that “employees will make requests for supplies, equipment, or services using the Purchase Order system.” Per policy employees are not to place an order with an outside vendor without prior approval from the chain of command through the Chief Operating Officer.
- While [SPD Policy 1.040](#) governs the budget, it does not explicitly address the use of investigative funds or purchases of sensitive equipment, such as equipment used for undercover operations.
- OPA’s investigation found the named employee received authorization from the Assistant Chief of Investigations for their \$2,600 lens purchase but did not utilize the Purchase Order (1.5) system. Instead, they submitted a receipt seeking reimbursement from their unit’s investigative funds.
- OPA was unable to identify any written policies governing the use of investigative funds.
- All witnesses interviewed by OPA stated SPD employees are not given regular training on procurements or when to use the 1.5 system.
- OPA reviewed comparable policies from other large police departments.
 - The Spokane Police Department has a specific policy addressing investigative funds handling.¹ The Spokane Police Department requires that, “purchases of any other services



[other than confidential funds] must be approved through the chain of command.” Other purchases are considered “imprest funds” which require the submission of a voucher and dual signing for reimbursement.

- The Bellevue Police Department discusses the maintenance of a cash “Investigative Fund” and requires a “written set of procedures governing their operation” along with periodic internal auditing and annual State auditing.² Bellevue’s policy also discusses the issuance and use of commercial business credit cards.

Recommendations

- SPD should create a policy regulating purchases and the use of investigative funds. or, at a minimum, require that units provided investigative funds promulgate their own written policies and procedures. These written standards or policy should articulate the intended and allowable uses for these funds, distinguish between sensitive and routine equipment that should be purchased through the 1.5 process, and set standards for approvals and accounting.
- SPD should provide training to employees and administrative staff responsible for using investigative funds to clearly delineate appropriate purchases for investigative funds versus items requiring the 1.5 approval process.

I appreciate your consideration and look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie J. Glenn".

Bonnie J. Glenn
Director, Office of Police Accountability



Footnote 1: Spokane Police Department. [Spokane Police Department Policy Manual](#). Policy 607: Investigative Funds. Effective: 07/19/2021.

Footnote 2: Bellevue Police Department. [BPD Policy Manual](#). Policy 16.00.120: Fiscal Management.