



LEXINGTON POLICE DEPARTMENT

150 East Main Street • Lexington, KY 40507 • (859) 258-3600

January 19, 2022

Mr. Chander Padmanabhan

RE: Formal Complaint PIU2021F-024 - Officer Zachary Flowers

Dear Mr. Padmanabhan,

The Public Integrity Unit completed the investigation of your Formal Complaint against Officer Zachary Flowers for violation of General Order 1973-02K, Disciplinary Procedures of Sworn Officers, Appendix B, Operational Rule 1.02 – Misconduct.

After reviewing the investigative summary, Chief Lawrence Weathers determined the disposition of the complaint as “Unfounded”. Chief Weathers has recommended that no further action be taken with regard to this complaint.

Formal Complaint PIU2021F-024 regarding Officer Zachary Flowers is closed.

Please feel free to contact the Public Integrity Unit if you have any questions regarding this determination.

Sincerely,

Lieutenant David Biroshik
Bureau of Investigation
Public Integrity Unit
(859) 258-3625



Lexington-Fayette Urban County
Division of Police
MEMORANDUM
Lexington, Kentucky

DATE OF ISSUE
January 18, 2022

EFFECTIVE DATE

NUMBER
COP:
22-0014

TO: Kenneth Armstrong, Commissioner
Department of Public Safety

SUBJECT: Disciplinary Recommendation
PIU2021F-024
Officer Zachary Flowers

FROM: Lawrence B. Weathers
Chief of Police

I met with Officer Zachary Flowers on January 14, 2022, and am recommending this case be administratively closed as "Unfounded" due to insufficient evidence for violation of General Order 1973-02K, Disciplinary Procedures of Sworn Officers, Appendix B, Operational Rule 1.02 – Misconduct.

I find that there does not appear to be sufficient evidence produced to sustain this complaint. Public Integrity Unit summary was reviewed.

I have included the summary of this formal complaint for your review.

Lawrence B. Weathers
Chief of Police

LBW/rmh

Attachment

**LEXINGTON POLICE DEPARTMENT
FORMAL COMPLAINT FORM**

FORM 111 (5/21)

File #: PIU 2021F-024

FOR OFFICIAL USE ONLY

Employee Involved: Officer Zachary Flowers			Employee #: 55443	Hire Date: 03/06/2017
Present Assignment: Bureau of Investigation / Family Abuse				
Complainant: Chander Padmanabhan			Complainant Address:	
Complainant Phone #:		Alternate Complainant Phone #:		Complainant Email:
Date of Incident: Various	Time of Incident: Various	Location of Incident: N/A		Date and Time Reported: 12/06/2021 - 1435
How Reported: <input type="checkbox"/> Letter <input type="checkbox"/> Phone <input checked="" type="checkbox"/> Person <input checked="" type="checkbox"/> Email				

DESCRIPTION OF ALLEGATIONS:

I am filing a formal complaint against Det. Zachary Flowers and Ofc. Keyshawn of Lexington Police Department. Det. Flowers and Ofc. Keyshawn have colluded with each other and charged me with several cases which were dismissed or I was found not guilty of since Ofc. Keyshawn is dating my former girlfriend I was made aware of this because Ofc. Keyshawn, Det. Flowers and [redacted] were out together discussing my cases at a bar. Det. Flowers charged me with false crimes and has not once questioned me about any cases which he charged me with. He has taken it upon himself to not follow policy and procedure to help out his friend/acquaintance Ofc. Keyshawn since he is dating [redacted]. Det. Flowers also tried to charge me with same crime by writing two different affidavits requesting an arrest warrant. The affidavits were copied verbatim except for leaving out one paragraph. Det. Flowers and Ofc. Keyshawn have also colluded with prosecutors and probation officers regarding my charges on behalf of [redacted]. I am also worried about being retaliated against since I am wanting to press charges against [redacted] of assault for which she committed against me on 12/25/2021 because she is dating Ofc. Keyshawn. I have spend several thousands of dollars proving my innocence since Det. Flowers and Ofc. Keyshawn have taken it upon themselves to collude against since Ofc. Keyshawn is dating [redacted]. The officers, the police department and the city of Lexington should be held accountable for the heinous and despicable actions of Det. Flowers and Ofc. Keyshawn

If the above allegations are true, Officer Flowers will be in violation of General Order 1973-02K, Disciplinary Procedures, Appendix B, Operational Rule 1.02 – Misconduct:

Officers shall conduct themselves at all times, both on and off duty, in such a manner as to reflect most favorably on the department and to not cast doubt on the officer's integrity, honesty, judgement, or character. Misconduct of an officer shall include that which tends to bring the department into disrepute or reflects discredit upon the officer

I swear/affirm that the facts set out in the allegations herein are true to the best of my knowledge and belief.

Complainant Signature: 

Date: 12/07/21

Subscribed and sworn before me this date: 12-7-21
(Date)

Melanie R. Votaw KYNP 20919
(Notary)

My Commission Expires: 2-3-2025

Witness:

Name: _____ Address: _____ Phone: _____

Recorded By: Bureau of Investigation, Public Integrity Unit

File #: PIU 2021F-024

Employee: Officer Zachary Flowers

CHIEF OF POLICE

[Finding: PC=Proper Conduct, IC=Improper Conduct, IE=Insufficient Evidence, PF=Policy Failure, UC=Unfounded Complaint]
Finding Policy Violation

UC	General Order 1973-02K, Disciplinary Procedures, Appendix B, Operational Rule 1.02 – Misconduct

Chief of Police Recommendation: Case Be Closed Corrective Training Disciplinary Action (see below)

Materials Reviewed: Reviewed PIU Summary

Comments:

Signature: *Andrea B. Weather* Date: 1-14-2022

DISCIPLINARY REVIEW BOARD

Finding Policy Violation

Disciplinary Review Board Recommendation: Case Be Closed Corrective Training Disciplinary Action (see below)

Comments:

Signature: _____ Date: _____

CHIEF OF POLICE FINAL RECOMMENDATION

Case Be Closed Corrective Training Disciplinary Action (see below)

Comments:

Signature: _____ Date: _____



LEXINGTON POLICE
DEPARTMENT
MEMORANDUM
Lexington, Kentucky

DATE OF ISSUE
January 6, 2022

EFFECTIVE DATE

NUMBER
PIU 22-002

<p>TO: Lawrence Weathers Chief of Police</p>	<p>SUBJECT: Formal P.I.U.21.F.024 Officer Zachary Flowers Summary</p>
<p>FROM: Lieutenant David Biroshik Bureau of Investigation Public Integrity Unit</p>	

This memorandum will provide a synopsis of the investigation; however, other supporting documents may be viewed in conjunction with this memorandum.

On December 07, 2021 Mr. Chander Padmanabhan filed a formal complaint against Officer Zachary Flowers for the violation of General Order 1973-02K, Disciplinary Procedures of Sworn Officers Appendix B, Operational Rule 1.02 – Misconduct

Allegations:

The allegation written out by Mr. Padmanabhan states:

I am filing a formal complaint against Det. Zachary Flowers and Ofc. Keyshawn of Lexington police department. Det. Flowers and Ofc. Keyshawn have colluded with each other and charged me with several cases which were dismissed or I was found not guilty of since Ofc. Keyshawn is dating my former girlfriend I was made aware of this because Ofc. Keyshawn, Det. Flowers and were out together discussing my cases at a bar. Det. Flowers charged me with false crimes and has not once questioned me about any cases which he charged me with. He has taken it upon himself to not follow policy and procedure to help out his friend/acquaintance Ofc. Keyshawn since he is dating Det. Flowers also tried to charge me with same crime by writing two different affidavits requesting an arrest warrant. The affidavits were copied verbatim except for leaving out one paragraph. Det. Flowers and Ofc. Keyshawn have also colluded with prosecutors and probation officers regarding my charges on behalf of I am also worried about being retaliated against since I am wanting to press charges against of assault for which she committed against me on 12/25/2021 because she is dating Ofc. Keyshawn. I have spend several thousands of dollars proving my innocence since Det. Flowers and Ofc. Keyshawn have taken it upon themselves to collude against since Ofc. Keyshawn is dating The officers, the police department and the city of Lexington should be held accountable for the heinous and despicable actions of Det. Flowers and Ofc. Keyshawn

If the above allegations are true, Officer Flowers will be in violation of General Order 1973-02K, Disciplinary Procedures, Appendix B, Operational Rule 1.02 – Misconduct:

Officers shall conduct themselves at all times, both on and off duty, in such a manner as to reflect most favorably on the department and to not cast doubt on the officer's integrity,

honesty, judgement, or character. Misconduct of an officer shall include that which tends to bring the department into disrepute or reflects discredit upon the officer.

Mr. Chander Padmanabhan's Interview

I attempted to interview Mr. Padmanabhan at Headquarters on December 07, 2021 after he had signed the Formal Complaint. He advised at the beginning he did not have any further information to add from what he had already written down and emailed in. I attempted to clarify several things he had alleged, but he refused to elaborate. I also attempted to talk about the criminal charges he had pled guilty to, but he stated his complaint had nothing to do with these cases.

He did give me the name of a friend and witnesses that he said observed Officer Simpson and Officer Flowers at a bar in Richmond, Kentucky several times. He stated his name was Brandon Thurman and he allegedly saw them at the bar with Mr. Padmanabhan's ex-girlfriend talking about his case on multiple occasions.

Due to an inability to gain further information that could assist in an investigation and Mr. Padmanabhan's refusal to answer many of the questions, the interview was ended after approximately 7 minutes, with no additional information obtained that would aid in the investigation.

Mr. Brandon Thurman's Interview

During Mr. Padmanabhan's interview he stated he did not have Mr. Thurman's contact information, but he could provide it to me at a later time. Once I left the interview I emailed him a reminder that I would need the information, which he provided to me a short time later. When I obtained the information I immediately called Mr. Thurman.

Mr. Thurman advised me that he had been at the Sports Bar Gillums in Richmond, Kentucky one Sunday when he observed Keshawn Simpson there with a group of people. Within the group of people he also saw Mr. Padmanabhan's ex-girlfriend . Mr. Thurman advised he saw Officer Simpson arrive around the same time and leave at the same time as but he could not tell if they were there together or not.

He advised he knew Officer Simpson from living in the same town together and the group of people he ran around with. He also advised he did not know any of the other individuals in the group of about 10 people and had no idea if any of them were police officers. He denied the claim that he overheard them talking about Mr. Padmanabhan's legal issues and believed those would not have been talked about, due to the sensitivity of the topic. He also denies seeing Officer Simpson at the bar, other than the one time described and never told him he observed Officer Flowers with him.

Mr. Thurman advised he felt bad for Mr. Padmanabhan and the legal issues he was facing. The conversation he had with him was expressing his support to him and during that time he spoke about seeing He denies the allegations Mr. Padmanabhan brought forth regarding what he saw and told him. He states the remarks he made were not true.

Officer Flower's Interview

Officer Flowers was interviewed in the Public Integrity Unit on December 15, 2021 at approximately 1200hrs.

Officer Flowers advised his involvement with Mr. Padmanabhan began in January 2021 when he was assigned a case by Sergeant Harville, where Mr. Padmanabhan was the suspect in a Violation of a Protective Order. The victim in the case was a _____ and she had been having difficulty getting a report completed, due to questions in jurisdiction between the Lexington Police Department and Richmond Police. Sergeant Harville assigned the case to Officer Flowers and asked him to assist her.

_____ This incident was not investigated by Officer Flowers as he was on vacation at the time of the incident.

In August of 2021, Mr. Padmanabhan was once again arrested, this time on Domestic Violence against _____. Again this case was not investigated by Officer Flowers.

When asked about his contacts with the County Attorney, Officer Flowers states he has never asked for any of the charges against Mr. Padmanabhan to be elevated or adjusted. The violations that were brought against Mr. Padmanabhan by Officer Flowers were amended down or dismissed with the agreement by Mr. Padmanabhan to plead guilty to amended charges brought forth by the County Attorney, according to Ms. Mary Tobin. None of the charges were dismissed due to lack of evidence, or lack of probable cause.

When asked about his contacts with _____, Officer Flowers advises that he has had no contact with her outside of the investigations he has been assigned. He has never been out in a personal type encounter with her and has only been to Gillums Sports Bar one time years ago.

Officer Simpson's Interview

Officer Simpson was interviewed in the Public Integrity Unit on December 14, 2021 at approximately 1600 hours. During the interview Officer Simpson advised that he is not and has never dated Mr. Padmanabhan's ex-girlfriend . He had just recently met her through a group of his friends as they were sitting at a "sports bar" named Gillums watching football on a Sunday afternoon. Officer Simpson did not arrive with her, nor leave with her on this date or any others.

During the encounter at Gillums no conversations about Mr. Padmanabhan were discussed, nor did Officer Simpson have a clue who he was. He has seen at the bar on additional occasions, due to them being friends with several individuals in the same group and meeting at the bar on additional Sundays to watch football. Officer Simpson also stated he has never called or talked to outside of the bar, although he is a part of a text message "string" with all of the friends where they discuss the plans to meet for similar events.

Officer Simpson advised that he does know Officer Flowers, but they do not hang out together, or have the same group of friends. He has never seen him at Gillums and has never discussed the cases involving Mr. Padmanabhan.

Interview

I spoke to by telephone on Friday January 07, 2022. During this recorded conversation she confirmed that she and Officer Simpson have never been together in a relationship and have never gone on a date alone with each other. She advised she does know him and has been at Gillum's when he was there, but it was with a group of people watching football. She advised that Mr. Padmanabhan's allegations are inaccurate and untrue.

Summary

There is no evidence in this case that Officers Simpson is dating Mr. Padmanabhan's ex-girlfriend . There is also no evidence at all that Officer Flowers did anything against policy when investigating the cases against Mr. Padmanabhan. The only witness provided by Mr. Padmanabhan is Mr. Brandon Thurman and he denies much of what Mr. Padmanabhan alleges. The charges sworn out on Mr. Padmanabhan were based on probable cause and were not dismissed for lack of evidence, but rather amended and dismissed when Mr. Padmanabhan plead guilty to multiple other charges.

Mr. Padmanabhan's allegations in this complaint have all been unfounded and I recommend this investigation be marked as such.



Lexington Police Department
MEMORANDUM
 Lexington, Kentucky

DATE OF ISSUE
 December 7, 2021

EFFECTIVE DATE

NUMBER
 PIU: 21-136

TO: Assistant Chief Roger Holland
 Bureau of Investigation

SUBJECT: FORMAL COMPLAINT

FROM: Lieutenant David Biroshik
 Bureau of Investigation
 Public Integrity Unit

COMPLAINANT: Mr. Chander Padmanabhan

ACCUSED OFC.: Detective Zachary Flowers

ALLEGATION: Violation of General Order 1973-02K, Disciplinary Procedures, Appendix B, Operational Rule 1.02 – Misconduct.

ALLEGED CIRCUMSTANCES: I am filing a formal complaint against Det. Zachary Flowers and Ofc.Keyshawn of Lexington Police Department. Det.Flowers and Ofc.Keyshawn have colluded with each other and charged me with several cases which were dismissed or I was found not guilty of since Ofc.Keyshawn is dating my former girlfriend I was made aware of this because Ofc.Keyshawn, Det.Flowers and were out together discussing my cases at a bar. Det.Flowers charged me with false crimes and has not once questioned me about any cases which he charged me with. He has taken it upon himself to not follow policy and procedure to help out his friend/acquaintance Ofc.Keyshawn since he is dating . Det.Flowers also tried to charge me with same crime by writing two different affidavits requesting an arrest warrant. The affidavits were copied verbatim except for leaving out one paragraph. Det.Flowers and Ofc.Keyshawn have also colluded with prosecutors and probation officers regarding my charges on behalf of . I am also worried about being retaliated against since I am wanting to press charges against of assault for which she committed against me on 12/25/2021 because she is dating Ofc. Keyshawn. I have spend several thousands of dollars proving my innocence since Det.Flowers and Ofc.Keyshawn have taken it upon themselves to collude against since Ofc.Keyshawn is dating . The officers, the police department and the city of Lexington should be held accountable for the heinous and despicable actions of Det.Flowers and Ofc.Keyshawn

ACTION REQUESTED:

- The Bureau Commander and Detective Flowers should sign the Acknowledgment Sheet and process this complaint.
- The Commanding Officer should provide the attached copy of the Form 111 and the Officer's Rights Packet to Detective Flowers.

- Detective Flowers should contact the Public Integrity Unit to arrange for a time to provide a formal statement.

	<u>DATE</u>	<u>TIME</u>
Bureau Commander <u><i>[Signature]</i></u>	<u>12/8/21</u>	<u>1515</u>
Supervisor <u><i>[Signature]</i></u>	<u>12/8/21</u>	<u>1515</u>
Officer <u><i>[Signature]</i></u>	<u>12/8/21</u>	<u>1515</u>

Accused officer would like the Public Integrity Unit to notify the FOP President or their designee that a formal complaint is filed against them. (Circle One) YES or NO

Returned to the Public Integrity Unit *[Signature]* 35304 12/8/21 1523

LT. D. Biroschik
 Lieutenant David Biroschik
 Bureau of Investigation
 Public Integrity Unit

mrv

enclosures

cc: Chief Lawrence Weathers
 file – PIU2021F-024

**LEXINGTON POLICE DEPARTMENT
FORMAL COMPLAINT FORM**

FORM 111 (5/21)

File #: PIU 2021F-024

FOR OFFICIAL USE ONLY

Employee Involved: Officer Zachary Flowers			Employee #: 55443	Hire Date: 03/06/2017
Present Assignment: Bureau of Investigation / Family Abuse				
Complainant: Chander Padmanabhan			Complainant Address:	
Complainant Phone #:	Alternate Complainant Phone #:	Complainant Email:		
Date of Incident: Various	Time of Incident: Various	Location of Incident: N/A	Date and Time Reported: 12/06/2021 - 1435	How Reported: <input type="checkbox"/> Letter <input type="checkbox"/> Phone <input checked="" type="checkbox"/> Person <input checked="" type="checkbox"/> Email

DESCRIPTION OF ALLEGATIONS:

I am filing a formal complaint against Det. Zachary Flowers and Ofc. Keyshawn of Lexington Police Department. Det. Flowers and Ofc. Keyshawn have colluded with each other and charged me with several cases which were dismissed or I was found not guilty of since Ofc. Keyshawn is dating my former girlfriend. I was made aware of this because Ofc. Keyshawn, Det. Flowers and [redacted] were out together discussing my cases at a bar. Det. Flowers charged me with false crimes and has not once questioned me about any cases which he charged me with. He has taken it upon himself to not follow policy and procedure to help out his friend/acquaintance Ofc. Keyshawn since he is dating [redacted]. Det. Flowers also tried to charge me with same crime by writing two different affidavits requesting an arrest warrant. The affidavits were copied verbatim except for leaving out one paragraph. Det. Flowers and Ofc. Keyshawn have also colluded with prosecutors and probation officers regarding my charges on behalf of [redacted]. I am also worried about being retaliated against since I am wanting to press charges against [redacted] of assault for which she committed against me on 12/25/2021 because she is dating Ofc. Keyshawn. I have spend several thousands of dollars proving my innocence since Det. Flowers and Ofc. Keyshawn have taken it upon themselves to collude against since Ofc. Keyshawn is dating [redacted]. The officers, the police department and the city of Lexington should be held accountable for the heinous and despicable actions of Det. Flowers and Ofc. Keyshawn.

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I swear/affirm that the facts set out in the allegations herein are true to the best of my knowledge and belief.

Complainant Signature: [Signature]

Date: 12/07/21

Subscribed and sworn before me this date: 12-7-21
(Date)

Melanie R. Votaw KY NP 20919
(Notary)

My Commission Expires: 2-3-2025

Witness:

Name: _____ Address: _____ Phone: _____

Recorded By: Bureau of Investigation, Public Integrity Unit

File #: PIU 2021F-024

Employee: Officer Zachary Flowers

CHIEF OF POLICE

[Finding: PC=Proper Conduct, IC=Improper Conduct, IE=Insufficient Evidence, PF=Policy Failure, UC=Unfounded Complaint]

Finding Policy Violation

Chief of Police Recommendation: Case Be Closed Corrective Training Disciplinary Action (see below)

Materials Reviewed:

Comments:

Signature: _____ Date: _____

DISCIPLINARY REVIEW BOARD

Finding Policy Violation

Disciplinary Review Board Recommendation: Case Be Closed Corrective Training Disciplinary Action (see below)

Comments:

Signature: _____ Date: _____

CHIEF OF POLICE FINAL RECOMMENDATION

Case Be Closed Corrective Training Disciplinary Action (see below)

Comments:

Signature: _____ Date: _____

FOR OFFICIAL USE ONLY

File #: PIU 2021F-024

Employee: Officer Zachary Flowers

ALLEGATIONS CONTINUED:

A large, empty rectangular box with a thin black border, occupying most of the page. It is intended for recording the details of the allegations mentioned in the header.

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