January 19, 2022

Mr. Chander Padmanabhan

RE: Formal Complaint PIU2021F-025 - Officer Keshawn Simpson

Dear Mr. Padmanabhan,

The Public Integrity Unit completed the investigation of your Formal Complaint against Officer Keshawn Simpson 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-025 regarding Officer Keshawn Simpson is closed.

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

Sincerely,

Lieutenant David Biroschik
Bureau of Investigation
Public Integrity Unit
(859) 258-3625
MEMORANDUM
Lexington, Kentucky

DATE OF ISSUE: January 18, 2022

TO: Kenneth Armstrong, Commissioner
Department of Public Safety

FROM: Lawrence B. Weathers
Chief of Police

SUBJECT: Disciplinary Recommendation
PIU2021F-025
Officer KeShawn Simpson

I met with Officer KeShawn Simpson on January 12, 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
FOR OFFICIAL USE ONLY

Employee Involved:
Officer Keshawn Simpson

Employee #: 55470
Hire Date: 03/06/2017

Present Assignment:
Bureau of Patrol / East Sector

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: Letter Phone Person 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 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.

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: 12/17/21
(Date) [Signature]
(Notary) My Commission Expires: 2/3/2025

Witness:
Name: [Name]
Address: [Address]
Phone: [Phone]

Recorded By: Bureau of Investigation, Public Integrity Unit
CHIEF OF POLICE

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

Finding

<table>
<thead>
<tr>
<th>Policy Violation</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Order 1973-02K, Disciplinary Procedures, Appendix B, Operational Rule 1.02 – Misconduct</td>
</tr>
</tbody>
</table>

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

Materials Reviewed: Reviewed PIU Summary

Comments:

Signature: Lawrence L. Weather Date: 1/12/2022

DISCIPLINARY REVIEW BOARD

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
LEXINGTON POLICE DEPARTMENT
MEMORANDUM

DATE OF ISSUE: January 6, 2022

EFFECTIVE DATE: 

NUMBER: PIU 22-003

TO: Lawrence Weathers
Chief of Police


FROM: Lieutenant David Biroschik
Bureau of Investigation
Public Integrity Unit

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 I 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 Ofe. 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 Ofe. 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 Ofe. Keyshawn for assault for which she committed against me on 12/25/2021 because she is dating Ofe. Keyshawn. I have spend several thousands of dollars proving my innocence since Det. Flowers and Ofe. Keyshawn have taken it upon themselves to collude against since Ofe. 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 Ofe. 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 or 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.
COMPLAINANT: Mr. Chander Padmanabhan

ACCUSED OFC.: Officer Keshawn Simpson


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 I 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. 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 Ofc. Keyshawn. I have spent 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 Office Simpson 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
Officer Simpson.

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

Bureau Commander: [Signature]
Date: 12-07-2021
Time: 20:16

Supervisor: [Signature] 37217 LIEUTENANT

Officer: [Signature] 55470

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] 12-18-2021 14:57

---

Lieutenant David Biroschik
Bureau of Investigation
Public Integrity Unit

mr

enclosures

cc: Chief Lawrence Weathers
    file – PIU2021F-025

FORM 202
LEXINGTON POLICE DEPARTMENT
FORMAL COMPLAINT FORM
FOR OFFICIAL USE ONLY

File #: PIU 2021F-025

Employee Involved:
Officer Keshawn Simpson

Employee #: 55470
Hire Date: 03/08/2017

Present Assignment:
Bureau of Patrol / East Sector

Complainant:
Chender 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: Letter Phone Person 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 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

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

Complainant Signature: Charles Fl
Date: 12/07/21

Subscribed and sworn before me this date: 12/17/21
(Date)

My Commission Expires: 2-3-2022

Witness:
Name: ____________________________________________________________ Address: ____________________________________________________________ Phone: ________________________________

Recorded By: Bureau of Investigation, Public Integrity Unit
CHIEF OF POLICE

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

Policy Violation

<table>
<thead>
<tr>
<th>Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

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

Materials Reviewed:

Comments:

Signature: ___________________________ Date: __________________

DISCIPLINARY REVIEW BOARD

Policy Violation

<table>
<thead>
<tr>
<th>Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

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