NEW YORK CITY COMPTROLLER
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A Blueprint for Department-Wide Restraint:
An Analysis of NYPD Excessive Force Complaints, Claims, and Lawsuits

BUREAU OF POLICY AND RESEARCH

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Contents

Executive Summary

Allegations from the public that New York City Police Department's (NYPD) officers have used excessive or unnecessary force [increased](#) significantly during the Adams Administration,[1] increasing risks to New Yorkers, costly claims payouts, and the erosion of community trust that can undermine public safety. Incidents of excessive or unnecessary use of force investigated and closed by the City's Civilian Complaint Review Board (CCRB) jumped by 49% between 2022 and 2023, to the highest number since 2013. In addition, in Fiscal Year 2025, "Police Action" claims—including those involving excessive or unnecessary force—were the most common tort claims against the City, with 6,082 claims filed and over $113 million in settlements, making the NYPD the City's largest source of claims.[2]

Some recent developments suggest that the NYPD is taking steps to better address officer misconduct. In March 2025, Commissioner Jessica Tisch said that the NYPD imposed discipline in 100% of substantiated cases prosecuted by the CCRB.[3] The NYPD has also shifted from sending officers who conducted unconstitutional stops solely to retraining, imposing stricter disciplinary measures such as suspension in some cases. However, gaps remain. For example, after CCRB substantiated charges following a Force complaint, NYPD's Deputy Commissioner of Trials, Rosemarie Maldonado, found that Lt. Jonathan Rivera's shooting was not justified under New York law, found him guilty of Assault in the First Degree, and recommended termination in a March 5, 2025 decision. NYPD Commissioner Jessica Tisch reversed that decision, finding Rivera not guilty on all specifications on August 15, 2025, and allowed him to remain employed as an NYPD police officer.

While the NYPD's application of disciplinary measures is an essential component of accountability, it represents only one aspect of the broader policy discussion. Equally important are the proactive steps the NYPD takes to prevent excessive or unnecessary use of force in the first place, through measures such as training, supervision, and early intervention.

This report presents a first-of-its-kind analysis reviewing a combination of Force complaints against NYPD, CCRB data, legal settlements, and precinct-level trends to pinpoint where reform is most urgently needed. It examines the NYPD's Early Intervention System (EIS) including the Early Intervention Program, Performance Monitoring Program, and the Central Personnel Resource System (CPRS), finding that while these systems monitor individual officers, they overlook department-wide patterns, such as spikes in claims or persistently high-incident precincts. NYPD's Legal Bureau, through NYPD's Police Action Litigation Section (PALS), performs internal litigation trend reviews using what NYPD claims to be "merit-based" cases, but there is no written policy, no standard methodology, and no regular public reporting for department-wide analysis.[4] The Office of the Inspector General (OIG-NYPD) recommended that NYPD conduct (1) a department-wide analysis of litigation patterns and trends, as well as observable patterns and trends within individual precincts, and (2) internal reports describing department-wide and precinct-level patterns in its 2018 *Ongoing Examination of Litigation Data Involving NYPD* report. However, in its 2025 annual report, OIG-NYPD deemed both recommendations "Rejected."[5] By contrast, this report conducts a department-wide analysis of all lawsuits and claims together with

CCRB complaints to identify systemic and precinct-level risks. Drawing from national best practices, this report shows that department-wide and precinct-level analysis—used effectively in other jurisdictions—can more effectively target training and interventions to prevent excessive or unnecessary use of force.

Key Findings

While annual complaints submitted to CCRB have generally declined since 2006, they rose sharply during the Adams Administration. Complaints submitted to CCRB increased 50%, from 3,700 in 2022 to more than 5,500 in 2023, then increased again to more than 5,600 in 2024. This increase was driven in part by a rise in allegations of excessive or unnecessary force.

Allegations of excessive or unnecessary use of force and related tort claims against the NYPD surged in recent years.

- The number of incidents of excessive or unnecessary use of force investigated and closed by CCRB increased by 49% between 2022 and 2023.[i]

- In FY 2024, the NYPD had more tort claims than any other City agency, with 9,249 filings—up 31.8% from 7,017 in FY 2023—many involving misconduct allegations, particularly excessive or unnecessary force.[6]

A first-of-its-kind precinct-level analysis of CCRB complaints and misconduct settlements identifies a small number of precincts where targeted action is urgently needed to prevent excessive or unnecessary use of force.

- Sixteen precincts show an increase of 50% or more in average annual complaints to CCRB of excessive or unnecessary force. These precincts have also cost the City over $8.9 million in settlements for police actions from 2019–2024.
- The four precincts with 100+ Force complaints in the past three years are the 75th and 73rd precincts in Brooklyn (East New York, Cypress Hills) and the 40th and 44th precincts in the Bronx (Mott Haven, Melrose, Concourse, Highbridge).
- The precincts with the highest settlement totals—each exceeding $3 million since 2019—are all in central Brooklyn and the south and central Bronx, together accounting for more than $30 million in payouts.

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[i] To better understand patterns underlying police action claims, this Report's analysis includes CCRB Force complaints. "Force" is a discrete and well-defined category within CCRB data, making it a useful proxy for identifying potential misconduct at the precinct level. Although CCRB complaints and civil claims are filed through separate processes, both typically arise from the same types of underlying incidents—particularly excessive or unnecessary force. Analyzing CCRB data helps pinpoint where patterns of force-related misconduct are most concentrated and where future claims are more likely to emerge, enabling earlier risk detection, improved accountability, and potential reductions in legal liability.

There are more allegations of force and more settlements for police misconduct in precincts where high proportions of residents are Black or Hispanic/Latino.

- More than 85% of residents in the four precincts with more than 100 recent Force complaints are Black or Hispanic/Latino. All of the top 10 precincts with the most total Force complaints have populations that are majority Black or Hispanic/Latino.
- Citywide, for every additional 1 percentage point of a precinct's residents who are Black or Hispanic/Latino, there were 1.2 additional Force complaints for incidents from 2019 through 2024 (controlling for precincts' total populations).
- The 14 precincts with more than $1 million each in settlement payments are each home to populations that are majority Black or Hispanic/Latino. (In 12 of these 14 worst precincts, 85% or more of residents are Black or Hispanic/Latino.)

NYPD's Early Intervention System (EIS) fails to detect precinct-level and department-wide trends using all lawsuits and claims in line with national best practices and recommended by the Office of the Inspector General for the NYPD in 2018.

- Police departments across the country, including the Los Angeles County Sheriff's Department (LASD) and the Seattle Police Department (SPD), regularly analyze precinct-level and department-wide trends in excessive use of force to inform policy and training interventions.

- NYPD lacks a formal department-wide analysis of all lawsuits and claims, as recommended by OIG-NYPD. OIG-NYPD first made this recommendation in its 2018 *Ongoing Examination of Litigation Data Involving NYPD* and deemed it "Rejected" in its 2025 annual report. By contrast, the Comptroller Office's analysis in this report reviews all lawsuits and claims department-wide together with CCRB complaints.

Recommendations

To better protect the civil liberties of New Yorkers, reduce harm, build community-police trust to support public safety, and save New York City taxpayers the financial burden of costly settlements, the Comptroller's Office recommends the following interventions to better prevent excessive or unnecessary use of force:

1. **Strengthen the NYPD's Early Intervention System (EIS) with precinct-level analysis and oversight:** The NYPD's current Early Intervention System flags individual officers for non-disciplinary interventions based on complaints but fails to address broader patterns. To prevent harm, improve accountability, and reduce costly settlements, the NYPD should:

   a. Conduct regular department-wide analyses of CCRB complaints, legal claims, and settlements to identify systemic issues.

   b. Flag precincts requiring management-level intervention, including additional mandatory force-review audits, after-action debriefs, and precinct-level

corrective action plans, as leadership strongly shapes enforcement practices and culture.

    c. Implement precinct-wide interventions such as targeted training and guidance.

2. **Target high-risk precincts with non-disciplinary use-of-force training and structured supervision reforms.** The NYPD should deploy precinct-wide training, along with structured supervision reforms, including additional mandatory force-review audits, after-action debriefs, and precinct-level corrective action plans, where Force complaints and settlements are highest and rising, including:

    a. **Most Force complaints:** 75th, 40th, 73rd, 44th, and 46th precincts.

    b. **Highest settlement amounts (2019–2024):** 77th, 75th, 44th, 40th, and 52nd precincts (with more than $3 million in settlement payments for incidents since 2019)

    c. **Largest increases in Force complaints in recent years:** 45th, 108th, 88th, 43rd, 49th precincts, the top five precincts with the largest increases in annual Force complaints (with increases ranging from 92% to 323%), comparing the three most recent years to the three years prior.

3. **Increase transparency and improve accountability through quarterly public reports on department-wide misconduct and litigation trends as well as early-intervention outcomes:** The City publishes quarterly and annual reports about its early intervention system that list the number of officers reviewed, thresholds triggered, interventions directed, and selected post-entry indicators for those officers, such as subsequent CCRB complaints, internal investigations, and lawsuits. The figures are aggregated period totals across all officers (counts of officers reviewed, thresholds triggered, interventions directed and counts of post-entry indicators). They do not track individual outcomes over time, disaggregate results by intervention type, compare pre- and post-intervention outcomes, or report outcomes under the Performance Monitoring Program (PMP). To measure the efficacy of the City's early intervention and performance management programs, the NYPD should publish department-wide and precinct-level analyses of CCRB complaints, internal investigations, lawsuits, and settlements, and report Early Intervention Program (EIP) and Performance Monitoring Program (PMP) outcomes using anonymized officer-level data that are not currently published. Each quarterly release should include thresholds triggered, interventions used, 3-, 6-, and 12-month outcomes, and an effectiveness analysis showing which interventions are associated with reduced complaints, with appropriate privacy safeguards.

4. **Make City agencies—including the NYPD—financially responsible for settlement costs:** The City should expand the NYC Health + Hospitals model to every City agency, requiring agencies to absorb part of their own legal settlement costs. Budget projections would be based on prior years' trends, with savings reinvested and overruns covered by agency operating budgets. This would promote accountability, incentivize prevention, and reduce overall City liability.

Introduction

Excessive or unnecessary use of force by the New York City Police Department (NYPD) harms New Yorkers, erodes trust in public safety institutions, and exposes the City to significant legal and financial risk. When force is misused, the consequences extend far beyond individual incidents. People suffer physical injury and emotional trauma, communities, especially Black or Hispanic/Latino communities, lose confidence in those sworn to protect them, and taxpayers bear the cost of millions of dollars in settlements each year. Addressing these harms is essential not only to protect civil rights but also to maintain effective and equitable policing.

Recent trends point to a troubling escalation. The number of force incidents investigated by the Civilian Complaint Review Board (CCRB) increased 49% between 2022 and 2023 and the number of individual allegations of excessive or unnecessary force submitted to CCRB jumped by 57% between 2022 and 2023, and rose again in 2024 to 7,080 complaints.[7] Many of these allegations involve precincts where residents are overwhelmingly Black or Hispanic/Latino, underscoring persistent racial disparities in NYPD enforcement. These same neighborhoods have also been the source of some of the City's most costly settlements for police misconduct, magnifying the harm and financial burden.

NYPD has tools intended to prevent misconduct before it occurs, including its Early Intervention System (EIS). NYPD's EIS consists of the Early Intervention Program (EIP), the Performance Monitoring Program (PMP), and the Central Personnel Resource System (CPRS), which replaced the Risk Assessment Information and Liability System (RAILS).

- EIP is NYPD's non-disciplinary screening and support program; it reviews officers against defined thresholds and, when warranted, directs interventions such as training, mentoring, supervisor conferences, temporary reassignment, or referral to PMP.

- PMP is NYPD's formal monitoring status for cases that require sustained oversight, with defined levels, including Level II Civil Lawsuit Monitoring with a minimum 18-month duration.

- CPRS aggregates risk indicators for early-intervention reviews and supports supervisory oversight, including supervisor alert functions that were migrated from RAILS. Although CPRS can flag individual officers for review, neither CPRS nor the other EIS systems are designed to detect broader department-wide and precinct-level patterns in complaints or settlements. As a result, leadership often reacts to individual incidents rather than proactively addressing underlying issues that contribute to recurring harm.

NYPD's Legal Bureau, through NYPD's Police Action Litigation Section (PALS), conducts internal litigation reviews using what NYPD claims to be "merit-based" cases, but NYPD has no written policy, no standard methodology, and no regular public reporting for a department-wide analysis of all lawsuits and claims; by contrast, this report analyzes all lawsuits and claims department-wide together with CCRB complaints. OIG-NYPD first recommended that NYPD conduct (1) a department-wide analysis of all lawsuits and claims and (2) internal reports describing

department-wide and precinct-level patterns in its 2018 *Ongoing Examination of Litigation Data Involving NYPD* report. However, in its 2025 annual report, OIG-NYPD deemed both recommendations "Rejected."[8] Furthermore, the NYPD does not publicly report any data on the efficacy of its EIS tools, namely whether early intervention efforts reduce future complaints of misconduct or spending on claims.

This report presents the first precinct-level analysis combining CCRB Force complaint data with Police Action settlement data. By linking these two sources, this report's analysis identifies where excessive or unnecessary force is most concentrated, where it is increasing most rapidly, and where the financial impact is highest. The findings demonstrate that expanding early intervention to include precinct-level and department-wide trend analysis is both possible and necessary to reduce harm, improve accountability, and rebuild trust between the NYPD and the communities it serves.

NYPD Use of Force

Claims against police officers for misconduct account for a large portion of the total amount the City pays to settle all types of legal claims, and the number and size of these claims are increasing, presenting concerns both for individual claimants and the City budget. Of particular concern are claims against NYPD police officers for excessive or unnecessary use of force. Such violence harms New Yorkers and high-profile incidents and routine patterns of misconduct erode residents' trust in the police. As of September 16, 2025, FY 2025 Police Action claims total 6,082, with over $113 million in settlements. Incidents of police misconduct include:

- In 2018, Johanna Pagan-Alomar was involved in an incident where Officer Teresa Lustica hit her in the face repeatedly with a handcuff key gouging her eye. This was in response to questioning police officers during the arrest of her friend. The City settled the case in 2020 for $1.25 million.[9]
- In July 2021, the City of New York agreed to pay $567,500 to Tomás Medina after alleging he was put in an illegal chokehold by former detective Fabio Nunez and tased 13 times in response to a noise complaint.[10]

Patterns of excessive or unnecessary force subject New Yorkers to violence and harm and expose the City to legal and financial risk. This report identifies and analyzes these patterns at the precinct level, highlighting where misconduct is most concentrated and where targeted reforms are urgently needed to prevent future harm and rebuild public trust.

NYPD Force Analysis and Findings

This analysis of police misconduct and use of force utilizes data available from both the CCRB's investigations and litigated claims and settlements for police misconduct.

CCRB Investigations

Members of the public who feel they have been harmed by police action may file a complaint with the CCRB, which investigates some complaints and indicates whether the facts can be substantiated.

While complaints of all types of misconduct generally declined from 2009 through 2021, they increased substantially during the Adams Administration. The number of complaints submitted to CCRB increased from 3,700 in 2022 to nearly 5,600 in 2023, and again in 2024 to more than 5,600.[11] This was due, in part, to an increase in allegations of excessive or unnecessary force.

The total numbers of CCRB complaints fluctuated over time. The total number of complaints for all allegations within CCRB's jurisdiction peaked in 2006 with 7,663 complaints. Annual complaints generally declined since 2009, but increased substantially from 2022 to 2023, from 3,700 to 5,550 complaints submitted. Figure 1 below shows the total number of complaints submitted to CCRB, by the year the complaint was submitted.

Figure 1: Total Complaints Submitted to CCRB for All Misconduct Types, by Year Complaint Filed
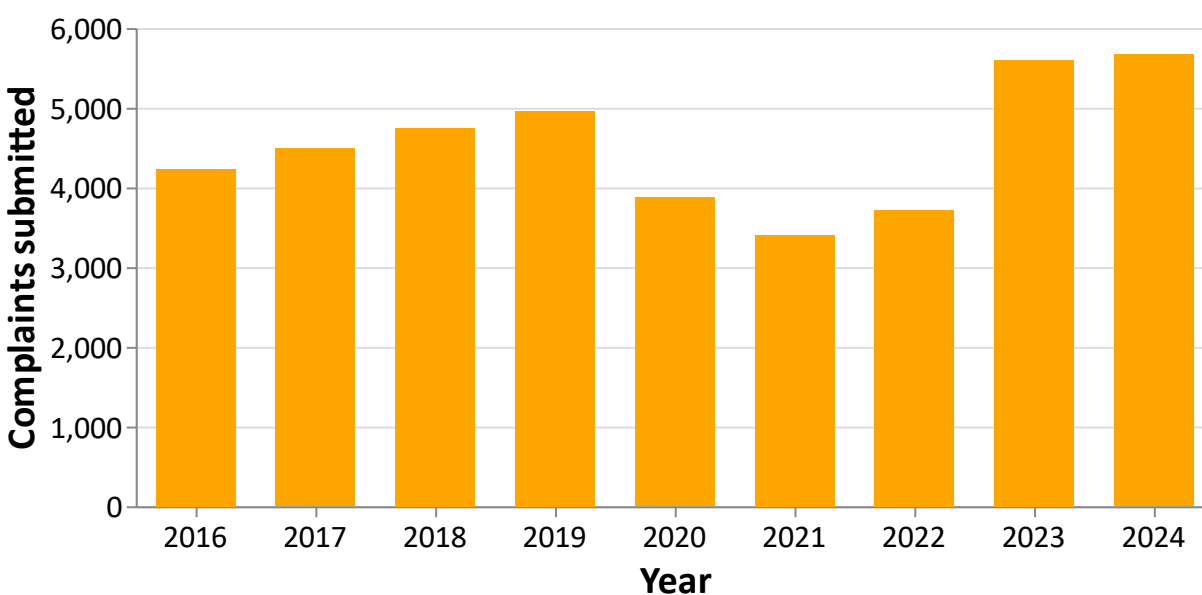

Source: Mayor's Management Report: Agency Performance Indicators (published on NYC OpenData)

To better understand patterns underlying these claims, this report particularly analyzed Force complaints submitted to and investigated by CCRB. "Force" is a discrete and well-defined category of CCRB complaints, making it a clear indicator of misconduct at the precinct level. A CCRB investigation into an officer's use of force requires an analysis of the circumstances in which force was used to determine if it was appropriate and in line with the NYPD's Patrol Guide. According to the NYPD's Patrol Guide, some acts of force, such as chokeholds, are always considered dangerous and inappropriate.

Analyzing CCRB data may help pinpoint where future claims are most likely to emerge, enabling the identification of emerging risks, improvement of accountability, and potential reduction of future liability.

The Office of the Comptroller's analysis identified trends relevant to specific precincts by comparing complaints between 2019–2021 and 2022–2024. Figure 2 shows the number of Force complaints that have been investigated and closed by CCRB, by the year the incident occurred.[12]
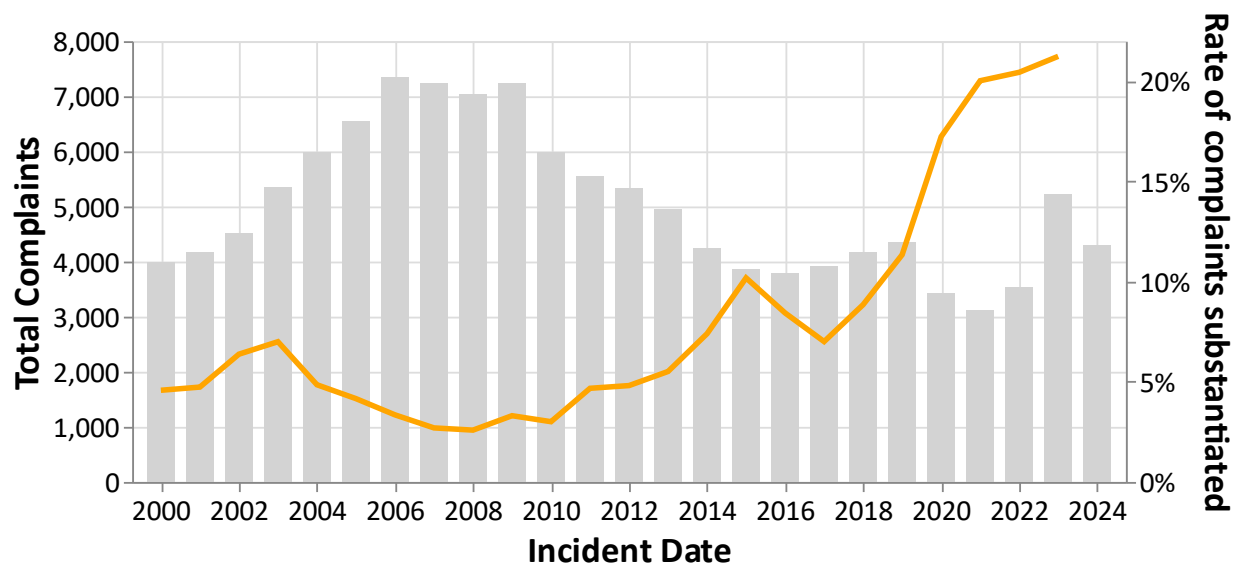
Figure 2: Total Force Complaints Investigated and Closed by CCRB, by Incident Date
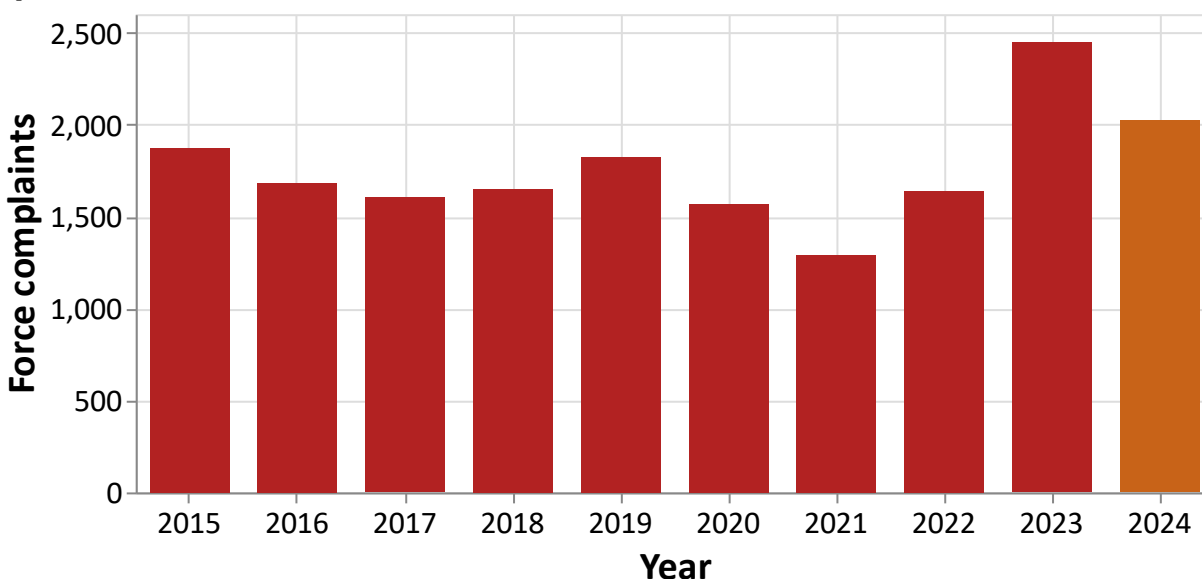
Sources: NYC CCRB: Complaints Against Police Officers (published on NYC OpenData) and Allegations Against Police Officers (published on NYC OpenData)

While the total number of complaints filed with CCRB has generally declined since 2009, complaints have increased in recent years. Meanwhile, the portion of complaints which CCRB substantiates have dramatically increased, from a low of 2.5% in 2008 to more than 20% in 2023. Possible contributors to this increase include NYPD's citywide body-worn camera deployment and CCRB's access to footage, both implemented in 2019, which continued to reduce indeterminate cases; 2019 City Charter changes, effective in 2020, which expanded CCRB authority and streamlined subpoenas; and ongoing CCRB process improvements (e.g., creation of a Document Specialists Unit in 2022 to centralize and speed body-worn camera and document requests). In addition, NYPD policy and deployment choices during this period may have increased the number of meritorious complaints, including protest tactics later curbed by a 2023 settlement, a 2019 surge in transit enforcement that increased police and public contacts, and the 2022 launch of Neighborhood Safety Teams focused on gun enforcement.

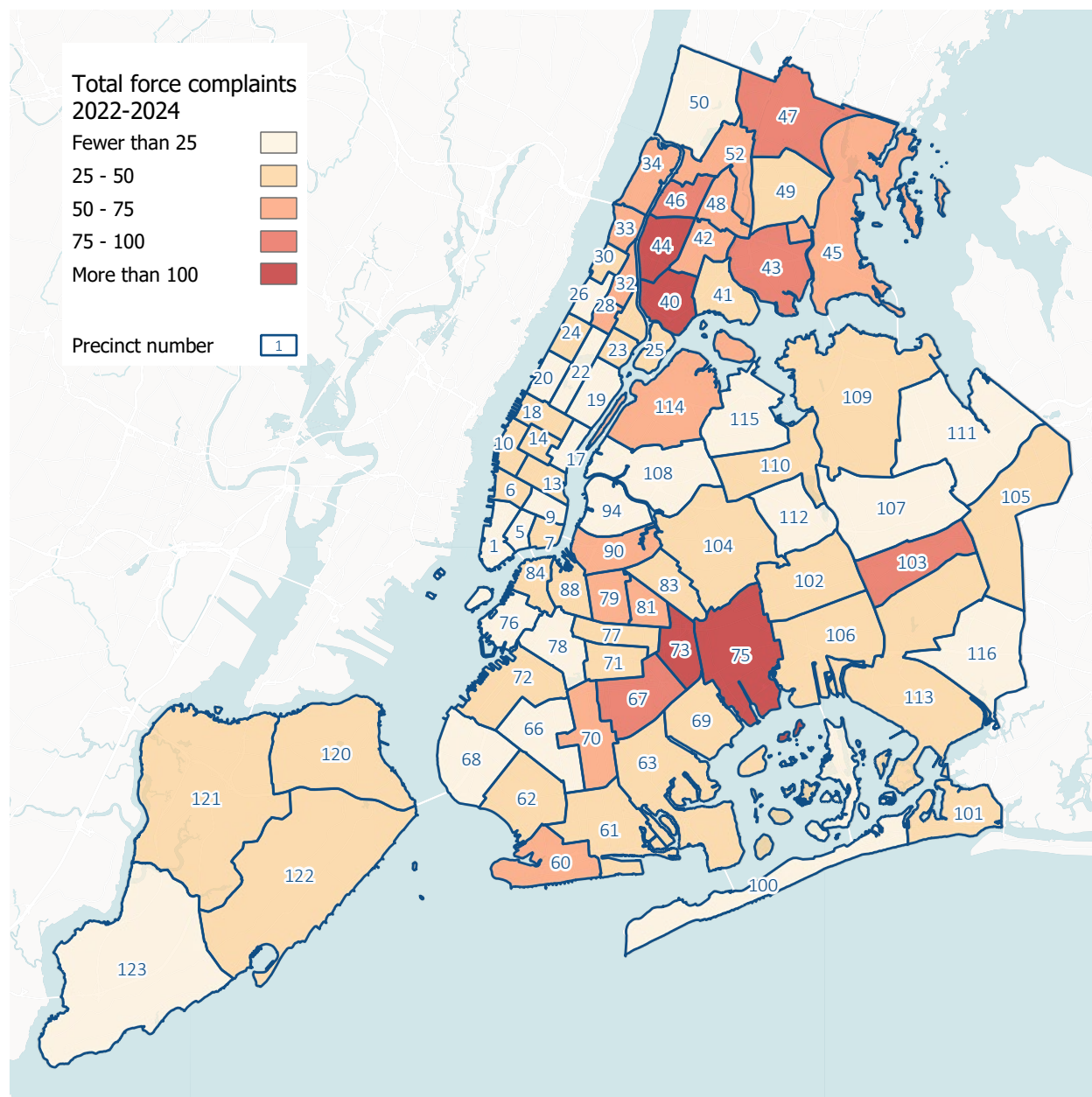**Figure 3: Rate of CCRB Complaints Substantiated and Total Complaints**

Sources: NYC CCRB: Complaints Against Police Officers (published on NYC OpenData) and Allegations Against Police Officers (published on NYC OpenData)

Figures 2 and 3 include only completed investigations, so there are some ongoing investigations and, possibly, incidents for which complaints have not yet been filed, which are missing from recent years of data.

The 75th, 40th, 73rd, and 44th precincts had the most CCRB Force complaints from 2022–2024. CCRB received more than 100 Force complaints in each of these precincts for incidents across these three years.

**Figure 4: Total Force Complaints, 2022–2024**

Sources: NYC CCRB: Complaints Against Police Officers (published on NYC OpenData) and Allegations Against Police Officers (published on NYC OpenData); NYC Department of City Planning: Police Precinct boundaries

These precincts also had large total settlements in cases for incidents since 2019. The 75th precinct had 104 cases totaling $9.9 million; the 44th precinct had 132 cases totaling $3.4 million; the 73rd precinct had 78 cases totaling $1.5 million; and the 40th precinct had 149 cases totaling $3.2 million. Altogether, these four precincts accounted for nearly $18 million in settlements, just from cases which this report's analysis was able to geolocate, or more than one-quarter of the settlement amounts paid over this period.

The NYPD precincts with the highest number of CCRB excessive or unnecessary force complaints have higher proportions of Black and Hispanic/Latino residents.

More than 85% of residents in each of the four precincts with the highest total number of CCRB complaints are Black or Hispanic/Latino. A majority of the residents in the 73rd and 75th precincts are Black (not Hispanic/Latino, 65% and 53%, respectively), and majorities of the residents in the 40th and 44th precincts are Hispanic/Latino (70% and 62%, respectively).[13] In comparison, New York City's total population is 31% White, 20% Black, 16% Asian, and 28% Hispanic/Latino.[14]

Figure 5: Demographics of Precincts with the Highest Number of CCRB Force complaints against NYPD
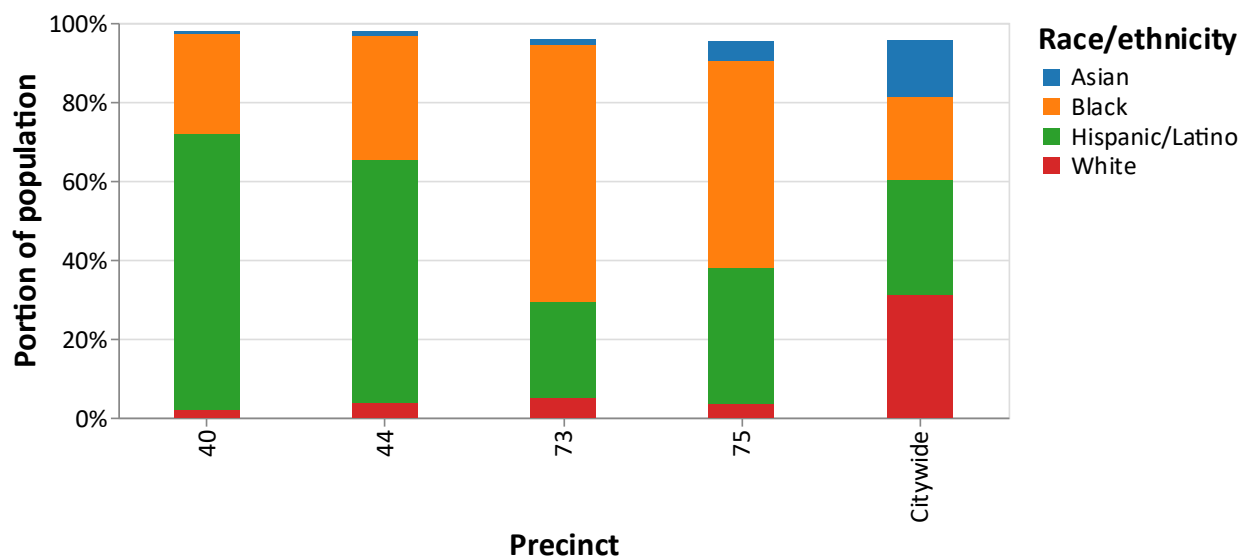
Sources: U.S. Census Bureau: American Community Survey 2022; NYC Department of City Planning: Police Precinct boundaries and Census Tracts boundaries

Overall, precincts where a higher proportion of residents are Black or Hispanic/Latino also record a higher number of excessive or unnecessary Force complaints filed with the CCRB. There were 68 Force complaints filed against officers in the median police precinct for incidents since 2019; in comparison, the nine precincts covering areas with majority-Black populations had a median of 107 Force complaints. Across all precincts, for every additional 1 percentage point of a precinct's residents who are Black or Hispanic/Latino, there were 1.2 additional Force complaints for incidents between 2019 and 2024 (controlling for precincts' total populations).

Some precincts have seen a more rapid increase in CCRB complaints in recent years.

Fifty-nine precincts had an increasing number of Force complaints, comparing years 2019–2021 to 2022–2024. Only 17 precincts (including the 68th, 61st, 19th, 71st) saw a declining number of

CCRB Force complaints. In 16 precincts Force complaints increased by 50% or more. See Figure 7 below for a chart of precincts with the largest percentage increase in the relevant period.

This metric compares each precinct with the same area in prior years, thus avoiding the confounding variation between precincts (such as differing rates of crime and different size populations).

Figure 6: Change in CCRB Force complaints from 2019–2021 to 2022–2024
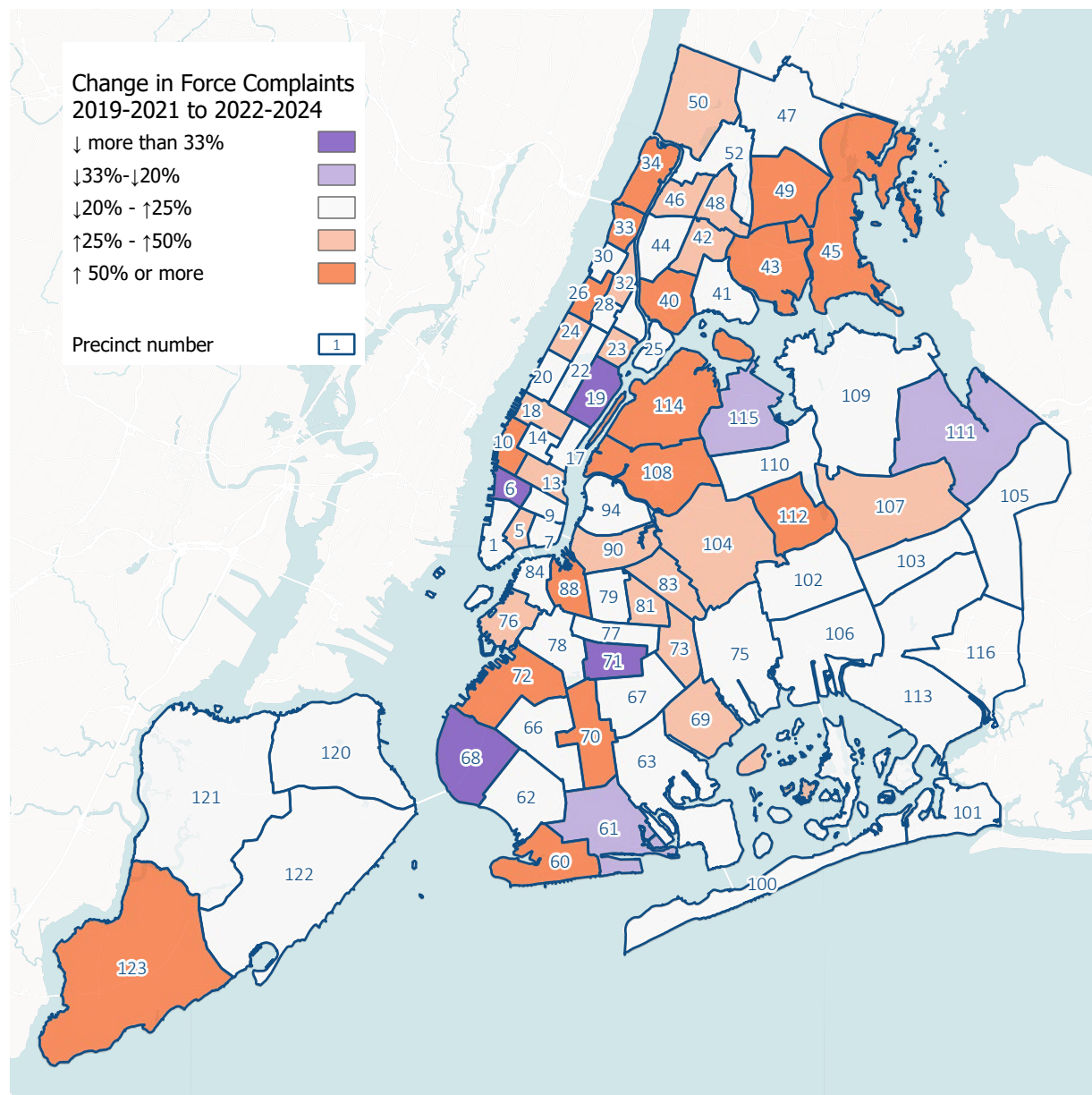
Sources: NYC CCRB: Complaints Against Police Officers (published on NYC OpenData) and Allegations Against Police Officers (published on NYC OpenData); NYC Department of City Planning: Police Precinct boundaries

Figure 7: NYPD Precincts with a greater than 50% increase in CCRB Force complaints from 2019–2021 to 2022–2024

Precinct	Force complaints		
	2019–2021 (average per year)	2022–2024 (average per year)	Percent change
45	4.3	18.3	323%
108	2.7	7.3	175%
88	6.3	12.7	100%
43	14.3	28.0	95%
49	8.0	15.3	92%
40	22.0	41.3	88%
33	10.3	19.3	87%
26	4.3	8.0	85%
123	4.3	8.0	85%
60	12.7	22.0	74%
114	10.7	18.3	72%
10	5.7	9.7	71%
112	4.0	6.7	67%
70	14.0	22.0	57%
34	11.3	17.3	53%
72	8.0	12.0	50%

Sources: NYC CCRB: Complaints Against Police Officers (published on NYC OpenData) and Allegations Against Police Officers (published on NYC OpenData)

These sixteen precincts cost the City at least $8.9 million in settlements for incidents occurring from 2019–2024.

These sixteen precincts with the sharpest increases in Force complaints encompass areas with varied demographic makeups: Majorities of residents in the 33rd, 34th, 40th, and 43rd precincts and pluralities in the 45th and 49th precincts are Hispanic or Latino; majorities in the 10th, 60th, and 123rd precincts and pluralities in the 88th, 112th, and 114th precincts are White; and the plurality of the population in the 108th precinct is Asian. The 26th, 70th, and 72nd precincts have mixed racial and ethnic compositions.

Litigated claims and settlements for police misconduct

In addition to analyzing patterns in Force complaints New Yorkers submitted to CCRB, this analysis revealed patterns in financial claims brought against the City, the Police Department, and individual officers and litigated in state and federal courts.

To focus on more serious claims and those which have been additionally reviewed, this analysis of police misconduct claims considers only those cases which entered litigation.

Many claims are settled before they enter litigation: Parties who allege harm by the City of New York, or any of its agencies or employees, must file a notice of claim with the Comptroller before filing litigation. The Comptroller's Office reviews these claims and may seek to settle a claim before litigation. Such settlements may be offered for a variety of reasons, and a settlement (or a litigated case) alone is not an admission of culpability or a finding of fact. These pre-litigation settlements were therefore not included in this analysis of settlement totals.

If a settlement is not reached, however, a claimant may file litigation against the City, at which point the police officers and the City's interests are represented by the Law Department. Through the course of litigation, additional facts about the alleged incident may be illuminated. Most cases against police officers do not reach a final legal judgment and are instead settled at some point before a judgment is made. However, the direction of the case and the facts uncovered may inform how a case is settled, so while such lawsuits do not demonstrate proof of liability or improper conduct, the larger trends from the settlement data can still be used to identify areas for improvement in how NYPD operates.

Notably, several precincts have had sharp increases in Force complaints in recent years and have also been the sites of numerous high-cost settlements for police actions. The 40th precinct had an 88% increase in Force complaints between 2019–2021 and 2022–2024 and also had 149 settlements exceeding $3 million total. Meanwhile, Force complaints against the 43rd have nearly doubled while that precinct has been the location of 79 cases totaling over $1.4 million.

Some NYPD precincts in the South Bronx and Central/East Brooklyn had large total settlement payments and high numbers of settlement cases.

Based on the portion of cases which this analysis was able to geolocate, the precincts with the highest settlement payments for incidents since 2019 are all in central and eastern Brooklyn and the central and southern Bronx. The 77th and 75th precincts in Brooklyn (Crown Heights and East New York/Cypress Hills, respectively) have the highest totals, at $11 million and $9.9 million, respectively (Each of these precincts are the locations of very large settlements: a $5.75 million settlement in the 77th precinct and an $8.5 million settlement in the 75th precinct). In the Bronx, the 44th, 40th, 52nd, 46th, 42nd, 41st, and 48th precincts all had case settlements totaling more than $2 million each for alleged incidents since 2019. The 40th and the 44th precincts also had the highest number of individual cases for incidents during these years, with 149 and 132 cases, respectively. For comparison, the median precinct had 23 cases during this period. See Figure 9 below for a chart of the precincts with the highest settlement payments and the associated number of claims. In every precinct that has settlements totaling $1 million or more, a majority of residents are Black or Hispanic/Latino (in all but two of these high-settlement precincts, 85% or more of residents are Black or Hispanic/Latino).

Figure 8: Total Settlement Payments for Incidents Since 2019
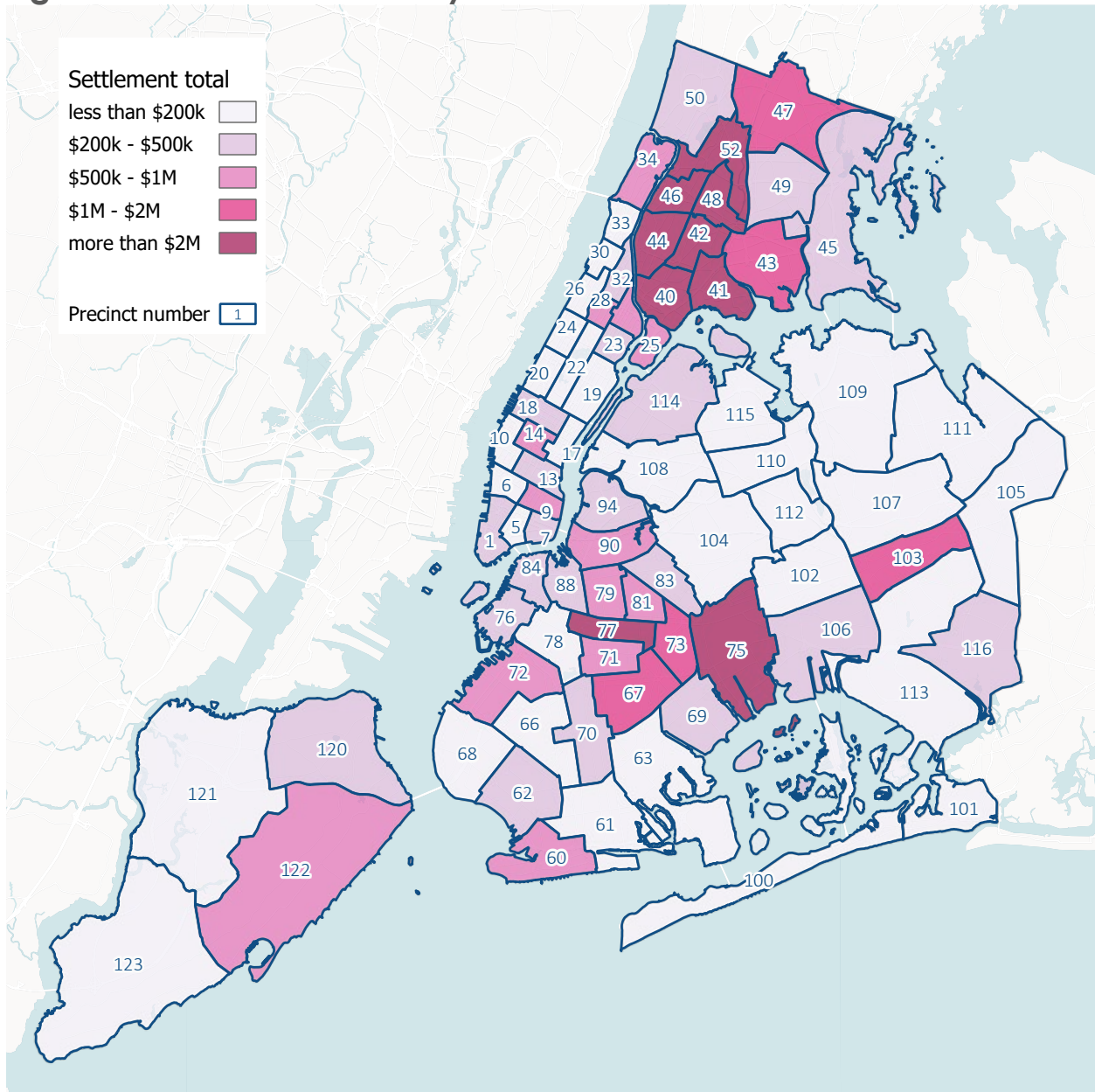
Sources: NYC Law Department: Civil Actions Regarding the Police Department; NYC Office of the Comptroller Notice of Claim data; NYC Department of City Planning: Police Precinct boundaries

Figure 9: NYPD Precincts with High Settlement Payments for Incidents Since 2019

Precinct	Number of cases	Settlement grand total
77	59	$ 11,017,000
75	104	$ 9,881,000
44	132	$ 3,367,000
40	149	$ 3,172,343
52	93	$ 3,043,500
46	97	$ 2,768,000
42	88	$ 2,674,125
41	79	$ 2,509,692
48	60	$ 2,063,060
47	80	$ 1,871,500
103	38	$ 1,690,250
73	78	$ 1,515,500
43	79	$ 1,419,000
67	88	$ 1,135,000

Sources: NYC Law Department: Civil Actions Regarding the Police Department; NYC Office of the Comptroller Notice of Claim data

NYPD's Early Intervention System (EIS)

NYPD's Early Intervention System (EIS) is designed to support employee wellness and improve professional performance by identifying and mitigating factors that may lead to negative performance issues, employee discipline, or negative interactions with the public. Early intervention is not disciplinary. It provides support such as targeted training and supervisory

reminders. NYPD's EIS consists of the Early Intervention Program (EIP), the Performance Monitoring Program (PMP), and the Central Personnel Resource System (CPRS).

EIP is NYPD's non-disciplinary screening and support program. It reviews officers against defined thresholds and, when warranted, directs short-term, supportive interventions such as training, mentoring, supervisor conferences, temporary reassignment, or referral to PMP. The goal is to correct issues early without changing an officer's employment status.

PMP is NYPD's formal monitoring status for cases that require sustained oversight. Placement puts an officer on a written monitoring plan with periodic performance reviews and documented supervisor check-ins; it has defined levels, including Level II Civil Lawsuit Monitoring with a minimum 18-month duration. PMP is non-disciplinary, but failure to meet the plan's requirements can be considered in separate disciplinary processes. In short, EIP flags and supports, while PMP monitors and verifies improvement over time. CPRS, which replaced the Risk Assessment Information and Liability System (RAILS), aggregates risk indicators for early-intervention reviews and supports supervisory oversight, including supervisor alert functions that migrated from RAILS and now operate within CPRS.

NYPD now publishes EIP quarterly and annual reports that list the number of officers reviewed, thresholds triggered, interventions directed, and selected post-entry indicators for those officers, such as subsequent CCRB complaints, internal investigations, and lawsuits. These reports are required by Local Law 68 of 2020 (Administrative Code §14-190) and by the *Floyd v. City of New York* remedial orders and represent progress on transparency. These figures are aggregated period totals across all officers and do not track the same officers over fixed windows or link outcomes to specific intervention types. As a result, current public reporting does not evaluate whether interventions change outcomes for individual officers over time, and there is no public reporting on outcomes under PMP. The federal monitor has also noted that it remains unclear whether EIP interventions are improving behavior. NYPD should publish anonymized, officer-level longitudinal outcomes with privacy safeguards, conduct routine effectiveness analyses by intervention type and by precinct, and extend similar outcome reporting to PMP.

While EIP and PMP are formal programs with written procedures focused on individual officers, NYPD does not maintain a formal, policy-based process to analyze and publish department-wide patterns in all claims, lawsuits, and complaints. NYPD's Legal Bureau, through NYPD's PALS, conducts internal litigation trend reviews on what NYPD claims to be "merit-based" cases, but there is no written policy, no standard methodology, and no regular public reporting for a department-wide analysis of all lawsuits and claims. OIG-NYPD first recommended that NYPD conduct (1) a department-wide analysis of litigation patterns and trends, as well as observable patterns and trends within individual precincts, and (2) internal reports describing department-wide and precinct-level patterns in its 2018 *Ongoing Examination of Litigation Data Involving NYPD* report; in its 2025 annual report, OIG-NYPD deemed both recommendations "Rejected." By contrast, the Comptroller's Office analysis in this report reviews all lawsuits and claims, department-wide, together with CCRB complaints.

A review of national best practices demonstrates that other police departments across the country regularly conduct this type of review.[15] For example, the Los Angeles County Sheriff's

Department produces monthly internal reports describing trends in active lawsuits, settlement amounts, and geographic concentrations of claims, and includes plans for intervention such as training or policy changes. In December 2021, the department issued a corrective action plan after an incident involving the alleged mistreatment of members of the media.[16] The plan outlined policy and training reforms regarding access, detentions, and the rights of journalists. [17] Similarly, the Seattle Police Department uses aggregate data to identify department-wide trends that may require intervention.

The City's payment structure for NYPD's settlements does not adequately discourage the type of conduct which results in costly settlements

The City's current payment structure for NYPD settlements does little to prevent the type of conduct that leads to costly claims. At present, nearly all police misconduct settlements are paid directly from the City's General Fund rather than from the NYPD's own budget. This arrangement shields the NYPD as a department, precincts, and individual officers from the financial consequences of misconduct and removes a key incentive to change behaviors or practices that result in harm. As a result, the cost of excessive or unnecessary force and other misconduct is borne entirely by taxpayers, even when the same officers or precincts are repeatedly involved in incidents that generate claims.

Recommendations

1. **Strengthen the NYPD's Early Intervention System (EIS) with precinct-level analysis and oversight:** The NYPD's current Early Intervention System (EIS) flags individual officers for non-disciplinary interventions based on complaints, but fails to address broader patterns. To prevent harm, improve accountability, and reduce costly settlements, the NYPD should enhance its early intervention system with a broader, more systemic approach. While the NYPD's current system identifies individual officers for non-disciplinary intervention, it does not analyze department-wide claims and settlements at the precinct level to identify systemic issues. Given that precinct leadership plays a critical role in setting enforcement norms and culture, the NYPD's failure to conduct such a precinct-level analysis presents a significant missed opportunity for the City. The NYPD should conduct regular, department-wide analysis of CCRB complaints, legal claims, and settlements to detect patterns in officer conduct, problematic enforcement practices, and areas in need of reform. In particular, NYPD should:

   - Conduct regular department-wide analyses of CCRB complaints, legal claims, and settlements to identify systemic issues.
   - Flag precincts requiring management-level intervention, including additional mandatory force-review audits, after-action debriefs, and precinct-level corrective action plans, as leadership strongly shapes enforcement practices and culture.
   - Implement precinct-wide interventions such as targeted training and guidance.

2. **Target high-risk precincts with non-disciplinary use-of-force training.** The Office of the Comptroller's analysis identified precincts of concern in this report, which may indicate that the Commanding Officers (i.e., Captains responsible for the specific precinct) may require additional oversight to ensure that their officers use force appropriately. NYPD should deploy precinct-wide training, along with structured supervision reforms, including additional mandatory force-review audits, after-action debriefs, and precinct-level corrective action plans, where Force complaints and settlements are highest and rising, including:

   - The top five precincts which had the highest number of CCRB Force complaints in the past three years. (These precincts also cover populations which are predominantly Black and Hispanic/Latino):

     - 75th, (East New York and Cypress Hills)
     - 73rd (Brownsville)
     - 44th (Grand Concourse, Bronx Terminal Market, and Yankee Stadium),
     - 40th (Mott Haven and Melrose), and
     - 46th (Morris Heights, University Heights)

   - 77th in Brooklyn (Crown Heights) and 52nd in the Bronx (Bedford Park, Kingsbridge), which, along with the 75th, 44th and 40th precincts mentioned above, have the highest total payout of settlements for incidents in the past six years.

- The five precincts with the largest increase in Force complaints, comparing the last three years to the three years prior:
  - 45th precinct in the Bronx (Co-op City and City Island)
  - 108th precinct in Queens (Long Island City, Sunnyside, and Woodside)
  - 88th precinct in Brooklyn (Clinton Hill, Fort Greene)
  - 43rd precinct (Soundview, Parkchester)
  - 49th precinct (Morris Park, Pelham Parkway)

3. **Increase transparency and improve accountability through quarterly public reports on department-wide misconduct and litigation trends and early intervention outcomes** to identify systemic risks and training needs, mirroring the analysis in this report to identify potential areas for improvement, such as training, in a manner similar to the analysis done by the Comptroller's Office in this Report. The NYPD could use the analysis done by the LASD, the SPD, or the Comptroller's Office pursuant to this report as a model. At a minimum, each quarterly release should include:
   a. **Department-wide and precinct-level trends:** counts and rates of CCRB complaints, internal investigations, lawsuits, and settlements; identification of spikes by command; and a summary of the corrective training or supervisory steps initiated with follow-up timelines.
   b. **EIP pipeline metrics:** number screened, thresholds triggered, intervention types and durations, repeat triggers, and referrals to PMP.
   c. **PMP transparency:** placements by level, reasons for placement, durations, exits, and outcomes while on and after monitoring, including counts for Level II Civil Lawsuit Monitoring.
   d. **Anonymized officer-level outcomes over time:** for officers flagged or monitored in the quarter, report outcomes at 3, 6, and 12 months (new CCRB complaints, internal investigations, lawsuits, and use-of-force incidents), with summaries by precinct.
   e. **Effectiveness analysis:** compare outcomes across intervention types and, where feasible, against matched non-flagged officers to estimate which actions are associated with reduced complaints and claims.
4. **Make City agencies—including the NYPD—financially responsible for settlement costs:** In the 2023 Wreckless Spending report, the Comptroller's Office recommended that the City implement agency-level accountability for crash-related settlement costs. This report recommends that all agencies, including NYPD, should internalize a portion of projected settlement costs within their annual budgets. Currently, the vast majority of settlements are paid out of the City's General Fund, largely removing direct fiscal consequences for agencies whose actions generate costly claims. A more accountable model is already in place at NYC Health + Hospitals (H+H), which took on financial responsibility for its own malpractice settlements in 2006. That shift created stronger incentives for risk reduction and contributed to a meaningful decline in settlement costs over time. A similar structure should be adopted across City agencies. The amount budgeted should be projected based on trends from prior years. Agencies that reduce claim settlements below the projected amounts could apply a portion of the savings toward the following year's budget. In

contrast, agencies whose claims exceed their projections would be responsible for covering the costs from their operating budgets in the following fiscal year. This would promote accountability, incentivize prevention, and reduce the City's overall legal liability.

There are many benefits to this approach. Directly linking financial consequences to NYPD's own budget can promote a stronger sense of accountability within the NYPD. If NYPD is directly impacted by financial penalties for misconduct, there may be a greater incentive to improve early intervention procedures, such as training and disciplinary processes, to reduce incidents of misconduct. A heightened sensitivity to the economic impacts of misconduct would encourage the agency to take proactive measures to reduce incidents that could lead to costly settlements. This approach also presents an opportunity to help rebuild trust between communities and the NYPD—trust that is essential to ensuring public safety—by signaling real accountability and financial consequences for misconduct. When the public sees the NYPD held directly responsible for costly settlements, it reinforces the expectation that the NYPD must uphold higher standards.

Conclusion

The sharp rise in CCRB Force complaints and Police Action settlements reflects more than a fiscal challenge. It signals a systemic problem in NYPD practices that causes harm to New Yorkers, undermines trust in policing, and exposes the City to ongoing financial risk. These issues are not evenly distributed. This report's first-of-its-kind precinct-level analysis shows that specific precincts are responsible for frequent incidents of excessive or unnecessary force and large settlement payouts for police misconduct. Excessive and unnecessary force incidents are concentrated in predominantly Black and Hispanic/Latino neighborhoods, where residents are already more likely to experience over-policing.

The NYPD has systems that can respond to individual officers whose conduct raises concerns, but these tools do not capture department-wide patterns in all claims, lawsuits, and complaints. Without that broader view, leadership is limited to reacting to incidents after they occur rather than addressing the cultural, supervisory, or operational problems that allow them to persist.

Expanding the Early Intervention System to include regular precinct-level and department-wide trend analysis would give the NYPD the ability to act before patterns of excessive or unnecessary force escalate. Other large police departments already use this type of analysis to guide reforms, target training, and focus supervisory oversight where it is most needed. Implementing a similar approach in New York City would help reduce harm, improve officer accountability, and rebuild community trust while also lowering the City's financial exposure. The data and findings in this report make clear that such a shift is not only possible but necessary for the NYPD to fulfill its mandate to protect and serve all New Yorkers fairly and effectively.

Methodology

Data

Records of complaints against police officers that have been investigated and closed by CCRB are published by CCRB through NYC OpenData.[18] CCRB records include complaints and allegations: each complaint represents a single alleged incident, and a complaint may include multiple allegations against multiple officers and/or for multiple alleged infractions.

A total of 23,933 complaints for incidents from 2019 through 2024, including 10,792 complaints of use of excessive or unnecessary force, have been investigated and closed by the CCRB. Note that because records of complaints are published only once CCRB has completed and closed investigations, records of ongoing investigations from more recent incidents are missing from this analysis. The Comptroller's Office standardized the 'Officer Command at Incident' field, then counted the number of unique excessive or unnecessary force complaints by all officers assigned to each command in each year.

Individuals seeking monetary damages for alleged personal injury or civil rights violations against the NYPD generally must first file a notice of claim with the Comptroller's office, allowing this office an opportunity to investigate and consider settling claims before filing a lawsuit (Plaintiffs that only allege claims based on federal law, such as Section 1983, can file a lawsuit in federal court without having to file a notice of claim). If a settlement is not reached with the Comptroller's Office, claimants may file a lawsuit against the City. At that point, the New York City Law Department generally represents police officers, but determinations on whether to represent a police officer happens on a case-by-case basis.

Under NYC Administrative Code § 7-114 (enacted by Local Law 166 of 2017), the NYC Law Department is required to publish records of civil cases against the police department or individual officers alleging misconduct, including use of force, assault, malicious prosecution, or unreasonable search or seizure.

These records of cases in litigation are the basis for this report's analysis of claims of police misconduct.

The NYC Law Department publishes records twice annually with all cases litigated within the preceding 5 years. The Comptroller's Office merged all publicly available case records, which include cases that were in active litigation at some point between January 1, 2013 and June 30, 2025. These records include 23,156 cases, naming 17,138 individual officers. Settlements in these cases total $1.23 billion.

The NYC Law Department's records do not include cases against the police for harms other than police misconduct actions, e.g. car crashes. These records also do not include claims that are settled before litigation commences. Recent reporting identified these as gaps in what Law Department reports.[19] Pre-litigation settlements were not included in this analysis of claims paid out.

To determine where and when the incidents underlying each case took place, the Comptroller's office joined these case records with additional data the Comptroller's office collects when reviewing initial notices of claims. Matching case and notice of claim records was possible only by matching court docket numbers or plaintiff names. Unfortunately, these manually entered data do not perfectly match and each contain duplicates. Plaintiff names were extracted from "matter name" (caption) and "Plaintiff & Firm" fields. Only unique plaintiff names were used for matching to claim records. Matching only on identical, non-duplicated docket numbers or names allowed for matching 60% of cases (13,979 cases) to a claim record.[ii]

A further limitation was that not all claim records included location information, or sufficient information to pinpoint the location of the claimed incident. Of the total cases, 54% (12,510) could be matched to a claim record with any recorded occurrence location and 6,874 (30% of the total) could be precisely geolocated using Geosupport, the City-maintained geocoding application.

Those cases that could be geolocated were assigned to the geographic NYPD precinct of the location in which the incident took place. This labeling misclassifies cases against officers from other NYPD commands (e.g. Narcotics, Strategic Response Group) but allows for an aggregated analysis of claims by precinct areas.

Of the $1.22 billion in total settlement payments included in the case records, $256 million, or 21% of the total, could be ascribed to a precinct. At each step of this matching process, records for some of the most expensive cases were lost: the average settlement across all cases in the Law Department data is $53,104, the mean settlement of cases matched to a claim record is $48,730, the mean settlement of cases with any geographic information is $50,066, and the mean settlements of cases geocoded is $37,243. However, the median settlement payment (for cases that have any settlement payout) is consistent, $25,000 for all cases, cases matched to claims, cases matched to a location, and those successfully geocoded. This suggests that while the matching process does omit some particularly high-dollar settlements, it includes relatively smaller settlements, which close cases for "routine" misconduct.

As a result of the unmatched claims omitted from this analysis, the total settlement payment amounts listed should be considered minimums, while the true total for each precinct is likely to be higher.

The Comptroller's Office evaluated the claim records with insufficient geographic information to be precisely geolocated. Case records that could be matched to a claim with location information were successfully geocoded at relatively consistent rates across the city and over time: The portion of cases that could be geocoded is consistent across years, ranging from 46% to 55% of

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[ii] Plaintiff names may be repeated if a single individual has filed more than one separate case, or if different individuals, in different cases, share the same name. Docket numbers are unique only within individual courts, but may be repeated across different courts, e.g. courts in different counties/boroughs.

all cases and 65% to 75% of cases that have matching claims with occurrence location. The portion of cases geocoded ranges from 64% of cases matched to a claim labeled as in the borough Manhattan, to 82% of those labeled Staten Island.

Demographic data are from the Census 2022 American Community Survey 5-year Estimates.[20] Population totals were collected at the Census Tract level. Tracts were matched to the precinct area containing the tract centroid. Population totals were aggregated at the precinct level, then proportions of each race and ethnicity category were computed at the precinct level.

Methods

This analysis identified precinct-level patterns of misconduct. The primary measure used to identify the worst precincts was the rate of increase in CCRB Force complaints. The time windows selected, 2019–2021, compared to 2022–2024, showed sufficient incidents to draw meaningful conclusions while also allowing an evaluation of recent trends.

After identifying the precincts with the largest increases in Force complaints, this analysis then examined the records of cases settled for incidents of misconduct within those precincts, and the demographic makeup of those precincts.

Additionally, to consider the overall relationship between race and police misconduct, this analysis used a regression model to identify a statistically significant positive relationship between the portion of a precinct's residents who are Black or Hispanic/Latino and the number of Force complaints, controlling for the precinct's total population.

Acknowledgements

Endnotes

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