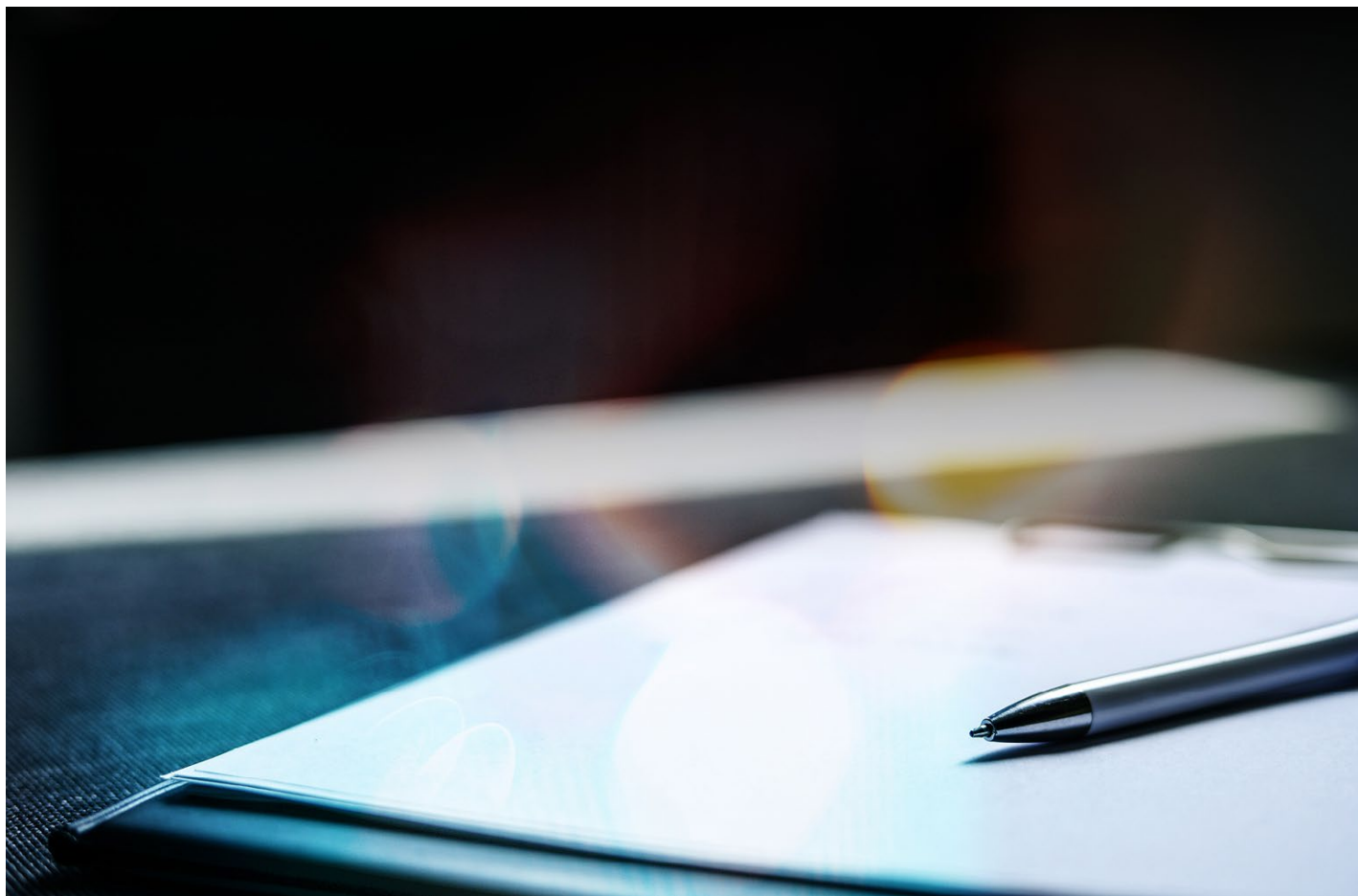


BAKERSFIELD POLICE DEPARTMENT

Analysis of Personnel Complaints Filed Against Bakersfield Police Department Sworn Officers in 2024



PREPARED FOR

City of Bakersfield
Bakersfield Police Department
California Department of Justice
- Parties to the Judgment

Date: November 26, 2025

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November 26, 2025

City of Bakersfield
Bakersfield Police Department
California Department of Justice

The Bakersfield Monitoring Team (BMT) has analyzed personnel complaints filed against sworn Bakersfield Police Department (BPD) personnel in 2024 and the associated reporting and investigative practices of the BPD. This report informs the stakeholders, including the Bakersfield community, of the department's efforts aimed at achieving compliance with the Stipulated Judgment (Judgment). The report identifies the trends, emerging good practice and those areas where improvements are needed in the management and investigation of personnel complaints. This analysis will assist BPD in directing its efforts and attention to support paragraph compliance submissions that will achieve Full and Effective Compliance with the Judgment.

In 2024, the department demonstrated progress on implementing the reforms related to personnel complaints. While this report highlights improvements in the overall approach to personnel complaint management and investigation, each complaint derives from a single encounter. Sometimes, these encounters do not reflect the organizational progress and as a result, members of the community can be negatively impacted. The BMT recognizes there is still a lot of work required of BPD to achieve compliance in this area, including promulgating a policy consistent with the Judgment and providing training to all of its personnel. Our work will continue to evaluate and assess the progress of the department as it moves to Full and Effective Compliance with the Stipulated Judgment requirements.

The BMT thanks the Bakersfield stakeholders and community, the men and women of BPD, and the stakeholders who have informed our work in Bakersfield.

Sincerely,

Jensen Hughes



Debra K. Kirby
The Bakersfield Monitor

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Introduction

This report continues the Bakersfield Monitor's (Monitor) goal for providing greater transparency for the reform efforts ongoing in Bakersfield. The Monitor submits this report, in part, as an opportunity to share emerging good practices and concerns with the department and Bakersfield stakeholders.

Pursuant to the Judgment entered into by the City of Bakersfield (City), the Bakersfield Police Department (BPD) and the California Department of Justice (CALDOJ), the Bakersfield Monitor is responsible for reporting on BPD's compliance with the Stipulated Judgment (Judgment).¹

The Monitor is tasked with determining the Full and Effective Compliance (FEC) of the department with each relevant paragraph under the Judgment. FEC requires BPD to have:

- a. Incorporated all Material Requirements of the Judgment Paragraph into policy;
- b. Trained relevant personnel as necessary to fulfill their responsibilities pursuant to the Material Requirements; and
- c. Ensured each Material Requirement is being carried out in practice.

This report continues to provide ongoing assessment of the personnel complaints data and BPD's personnel complaint management and investigation practices and how they compare to the Judgment requirements. Key goals arising from this report are to signal to BPD the areas that are on track; help identify those areas that may require additional focus and provide challenges to achieving compliance with the Judgment; and to provide information on how the department is progressing for the Bakersfield communities.

EXECUTIVE SUMMARY

This report assesses BPD personnel complaints practices using both a quantitative and qualitative analysis of the 2024 complaints against BPD sworn officers. The quantitative analysis assesses the raw data held, stored and recorded in BPD databases. The Bakersfield Monitor Team (BMT) used this data to provide further insight and analysis of the complaint trends involving BPD sworn officers in 2024. The qualitative analysis reviews a sample of the complaint investigations completed in 2024 for insight into BPD's management of personnel complaint investigations; We randomly selected a stratified sample of 35 (22.0%) of the completed personnel complaint investigations in 2024.. The BMT assessed these investigations for sufficiency and quality of personnel complaint management, from intake through the subsequent determination of applicable discipline. The assessment was focused on how BPD is trending as compared to prior years and whether BPD's practices are consistent with the Judgment and standard law enforcement practices.

¹ See generally, Stipulated Judgment Paragraphs 171 – 177

Data Analysis

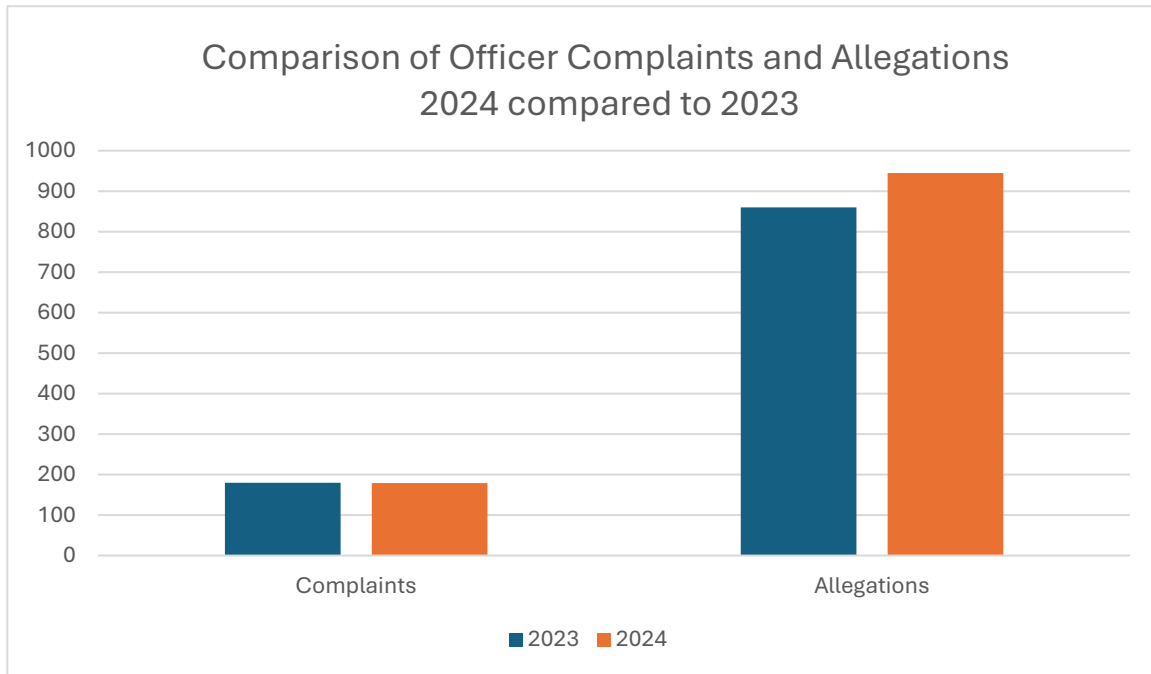


Figure 1. Comparison of Officer Complaints and Allegations in 2023 to 2024.

In 2024, BPD demonstrated improvement in its efforts to gain compliance with the reforms called for under the Stipulated Judgment (Judgment) Section 8 Complaints. As demonstrated in Figure 1, complaints were essentially flat, compared with 2023. Additionally, the sample files reviewed by the BMT identified improved review and management of personnel complaints. However, some areas remain concerning for the BMT and will continue to be evaluated in the upcoming year – namely, the increase in the number of officers having a more complaints as compared with their peers, and the significant decrease in the number of complaints deemed not sustained. For those cases closed in 2023, 23 (12.2%) complaints were categorized as not sustained, while for cases closed in 2024, seven complaints (4.5%) were categorized as not sustained. While the latter may be the result of improved investigative practices and tools, such as body worn cameras (BWC), the BMT will prioritize review of the practices and investigations for this classification in its 2025 review of cases.

The BMT observed allegations increased in 2024. Allegations are derived from each complaint and identify the detailed actions of the officer that are alleged to violate a specific BPD policy. In 2024, there were 945 allegations total, of which 753 (79.7%) were the result of a public complaint. Internally generated complaints accounted for 192 allegations (20.3%).

In 2024, the average complaint involved 2.02 officers and 2.54 allegations. These figures are statistically indistinguishable from 2023, during which time the average complaint involved 2.11 officers and 2.51 allegations. Within this context, complaints generally arose from encounters with more than one officer and generated at least two allegations.

In 2024, as with 2023, a relatively small segment of officers accounted for a disproportionate share of all officers named in complaints. In 2024, the threshold for the outlier officer group – those officers who had more complaints than their peers - was those officers having four or more complaints. This was also the same cutoff

identified for 2023. The 2024 group had 18 officers accounting for 26.1% of officer complaints (93), with an average of 5.17 complaints and a maximum of 12 complaints per officer. In 2023, 14 officers accounted for 17.6% of all officer complaints (65), with an average of 4.6 complaints and a maximum of six complaints. Taken together, outliers remain a small share of the workforce but carry a sizeable and growing share of the complaints as the year-to-year number of complaints is essentially the same. The BMT draws no determination from this other than there has been an overall increase in the number of officers and we will continue to monitor the specific facts that contribute to these complaints and the department's response.

The department's complaint management showed improvement in overall timeliness and consistency in classification. Additionally, the BMT noted the increased use of "unable to complete" as a classification – generally applied to officers who resigned under investigation. Further assessment is required and the BMT will review how BPD manages the investigations into officers who resign or retire while under internal investigation.

File Review

The BMT's sampling of personnel complaint investigation files identified the investigations were generally adequate and demonstrated good complainant engagement. The BMT did note inconsistencies in how cases were managed, for example, no record of an officer's statement in the file. However, we observed continued improvement in the effort to ensure all allegations are identified and that the finding matches the facts from the investigation.

In 2024, the BMT observed improved detailed narratives coming from the supervisory review of complaint investigations by lieutenants, captains, and others conducting chain of command reviews. The supervisory review process also identified misconduct not identified during the initial investigation as a result of BWC reviews. In the file sample, we also saw supervisory actions during the review process that corrected allegations to the appropriate classification and eliminated redundant allegations. As investigations progressed through the levels of supervisory review, the BMT observed supervisors ensuring the findings and recommendations fit the facts documented. This is also an improvement over past observations.

CONCLUSION

This report should be viewed as a form of gap analysis that identifies where BPD stands relative to the Judgment requirements for personnel complaint reforms.

The 2024 assessment reveals a system that is becoming more structured in its processes. The data show improvements in certain areas of timeliness and refinement in how allegations are classified and adjudicated. However, the persistence of concentrated complaint activity, the uneven pace of investigations and the lack of transparency around internal corrective systems indicate there are areas for further work under the Judgment. The findings in this report do not signal either success or failure. Rather, as intended, the BMT identifies those areas where BPD should ensure procedural consistency and ongoing organizational learning and oversight.

Policy

Policy sets the foundation for the subsequent organizational practices regarding how complaints are received, classified, investigated, reviewed and adjudicated. In 2024, the BMT continued to engage with BPD as it worked toward its reform goals, including the adoption of a new policy compliant with the Judgment requirements. While this work was substantive, it did not result in the adoption of a formal policy or published standard operating procedures (SOPs). On June 4, 2025, the BMT notified BPD that the draft policy was cleared for presentation to the Chief's Advisory Panel (CAP) for its input pursuant to Judgment Paragraph 64. On August 12, 2025, BPD presented the policy to the CAP. BPD is expected to return its comments to the CAP on December 9, 2025. As of October 1, 2025, BPD has not submitted this policy for review by the California Department of Justice (CALDOJ) pursuant to Judgment Paragraph 183. This review and approval are required to support implementation of training and policy, the three prongs required for BPD to achieve FEC. While the complaint review and management trends have demonstrated improvement in the department's organizational practices for the investigation of complaints, policy is needed to ensure the formal adoption of good practices. A personnel complaints policy that aligns with the Judgment will be the foundation for the compliance efforts of the department in this strategic area. Going forward, the BMT will assess the 2025 complaint practices under the Judgment standards regardless of when the policy is adopted.

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Quantitative Analysis – Personnel Complaints

The data sample for the quantitative analysis was all complaints registered by BPD in 2024. There are two types of complaints recognized by BPD: public complaints and internal investigations. Public complaints are complaints generated by a member of the community and submitted to BPD through its complaint process. Internal investigations are complaints generated by personnel inside BPD. Internal complaints have two types: one includes a supervisor taking timely action to address an employee's performance issue; and the other is a "formal" complaint that alleges misconduct to be further investigated. This type of complaint would include complaints from other law enforcement agencies or internal accountability mechanisms (e.g., the Use of Force Working Group).

COMPLAINTS RECEIVED IN 2024

In 2024, the number of complaints BPD received against employees ($n = 190$) was relatively consistent (1.6% increase) with the number of complaints received in 2023 ($n = 187$).² Given that BPD's Internal Affairs (IA) is not always responsible for the investigation of complaints against professional staff (i.e., non-sworn personnel),³ we excluded complaints against professional staff from subsequent analyses in this report. Of the complaints received against sworn employees in 2024, the majority involved sworn personnel within the department ($n = 179$). The number of complaints involving sworn personnel in 2024 was like 2023 ($n = 180$). While the number of complaints against sworn personnel remained relatively consistent in 2024, compared with 2023, there were some slight variations in the source of these complaints. In both 2024 ($n = 141$) and 2023 ($n = 134$), most complaints were public: 78.8% of complaints in 2024 as compared with 74.4% in 2023. We note in 2024, internally generated complaints against officers decreased slightly, compared with 2023. In 2024, 21.2% ($n = 38$) of the complaints were generated internally, as compared with 25.6% in 2023 ($n = 46$).

We analyze the difference in the cumulative number of complaints made against sworn employees for 2024 and 2023 to determine if there are differences in the complaints filed each year (Figure 2). The data indicate there are significant differences in the cumulative counts of monthly complaints received ($t = 3.98$, $p < .001$) but the effect on the complaints filed each year is rather modest (Cohen's $d = 0.14$), with the largest differences in the cumulative number of complaints seen in April ($n_{\text{Complaints 2024} > \text{Complaints 2023}} = 14$), May ($n_{\text{Complaints 2024} > \text{Complaints 2023}} = 20$), June ($n_{\text{Complaints 2024} > \text{Complaints 2023}} = 23$) and July ($n_{\text{Complaints 2024} > \text{Complaints 2023}} = 13$).

2 The BMT's 2023 Complaints Report lists 188 complaints received in 2023. One of these complaints was not captured when the data were repulled in 2025 for this report.

3 Complaints involving only professional staff members are investigated by the Human Resources Department for the City of Bakersfield. Complaints involving sworn personnel and professional staff are investigated by BPD's Internal Affairs unit and are thus retained in the analyses in this report.

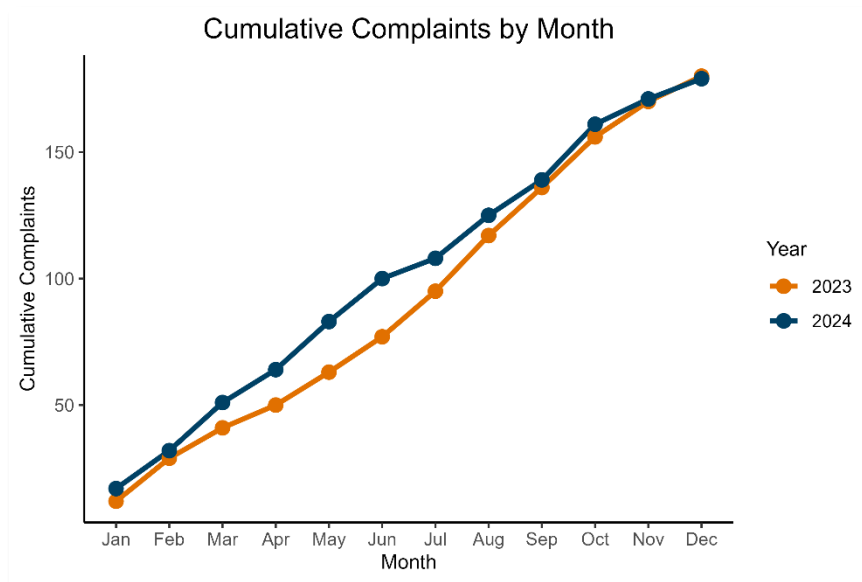


Figure 2. Cumulative Number of Complaints Filed Against Sworn BPD Employees in 2023 and 2024.

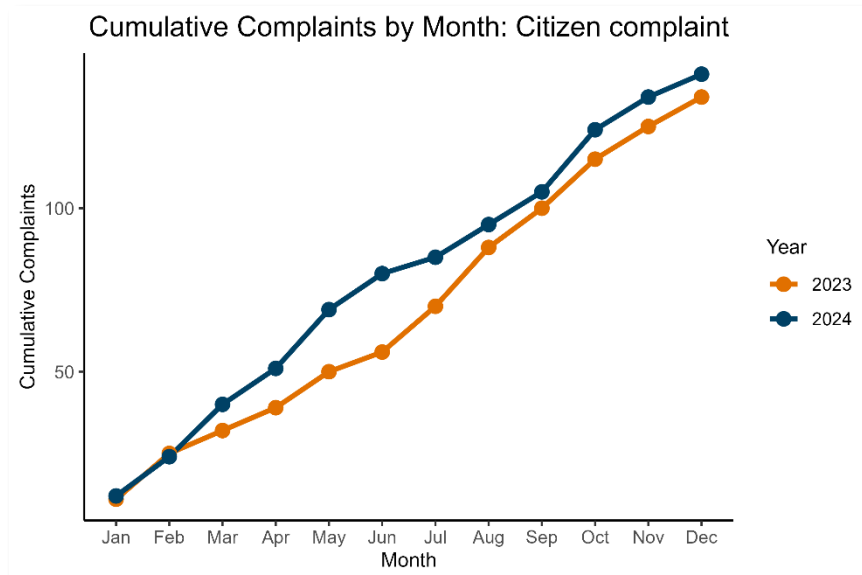


Figure 3. Cumulative Number of Public Complaints Filed in 2023 and 2024.

We note an important difference when we disaggregate the number of complaints by type (i.e., public complaints vs. internal investigations). Specifically, the number of public complaints, which accounts for most complaints received in both years, follows the global trend described above. Specifically, there are significant monthly differences in the cumulative number of public complaints made against BPD sworn employees in 2024 compared with 2023 ($t = 4.67$, $p < .001$), with a large effect size (Cohen's $d = 1.34$). As shown in Figure 3, the largest differences in the cumulative number of public complaints were seen in April (n Complaints 2024 > Complaints 2023 = 12), May (n Complaints 2024 > Complaints 2023 = 19), June (n Complaints 2024 > Complaints 2023 = 24) and July (n Complaints 2024 > Complaints 2023 = 15). Figure 4 shows no statistically significant difference in the cumulative number of internal investigations involving sworn BPD employees between 2023 and 2024 ($t = -0.78$, $p > .05$). For the first five months of the year, 2024 consistently had more investigations than 2023. However, beginning in June, that trend reversed. By December, 2023 had recorded eight more cumulative investigations than had been recorded in 2024, reflecting a net decline in internal investigations during the second half of the year.

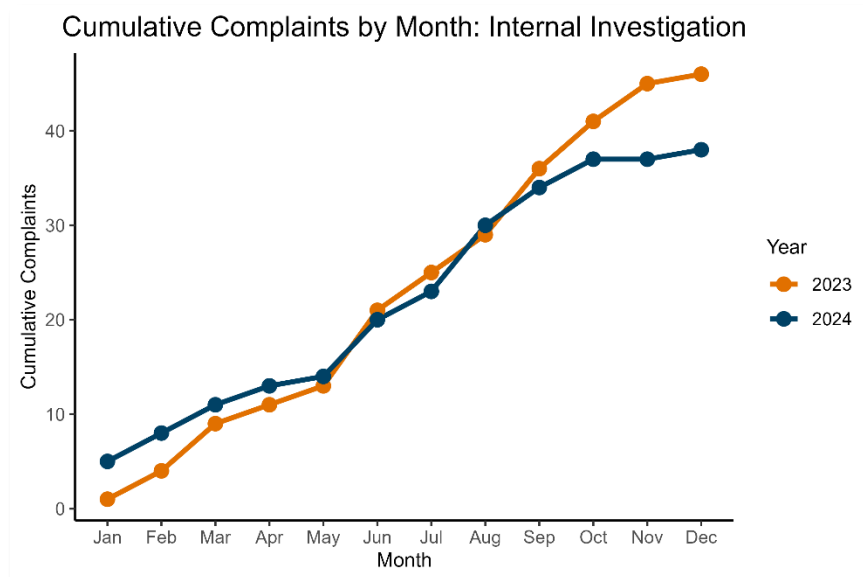


Figure 4. Cumulative Number of Internally Generated Complaints in 2023 and 2024.

Types of Allegations Made

In 2024, a total of 945 allegations (each complaint can have multiple allegations) were made against sworn personnel at BPD, with 79.7% ($n = 753$) stemming from public complaints and 20.3% ($n = 192$) coming from internally generated complaints.⁴ This distribution closely mirrors the overall source of complaints, with 78.8% originating from the public, indicating that public and internally generated complaints result in a comparable share of allegations relative to their frequency.

In 2024, the average complaint involved 2.02 officers and 2.54 allegations per complaint. These figures are statistically indistinguishable from 2023 ($M_{2023} = 2.11$ officers, 2.51 allegations), with no significant difference in

⁴ BPD Internal Affairs identifies and tracks allegations within each complaint.

the number of officers per case ($t_{(356.73)} = 0.45, p = .654$), or in the number of allegations per case ($t_{(356.13)} = -0.15, p = .884$).

However, the source of the complaint is strongly linked to variations in case characteristics. In 2024, citizen complaints involved significantly more officers per case ($M = 2.28$) than internally generated investigations ($M = 1.37; t_{(270.71)} = 5.46, p < .001$). Conversely, internal investigations contained significantly more allegations per case ($M = 3.10$) than those initiated by the public ($M = 2.35; t_{(109.02)} = -3.09, p = .003$). Figure 5 illustrates these differences in the distribution of case complexity. In each panel, the shape of the density curve indicates how complaints are distributed across the range of possible values, while the dashed vertical lines denote the mean for each group. Wider, flatter curves indicate greater variability across cases, whereas narrower, taller curves indicate more consistency around the mean. Taken together, these distributions reinforce the statistical findings and highlight distinct patterns of case composition by complaint source.

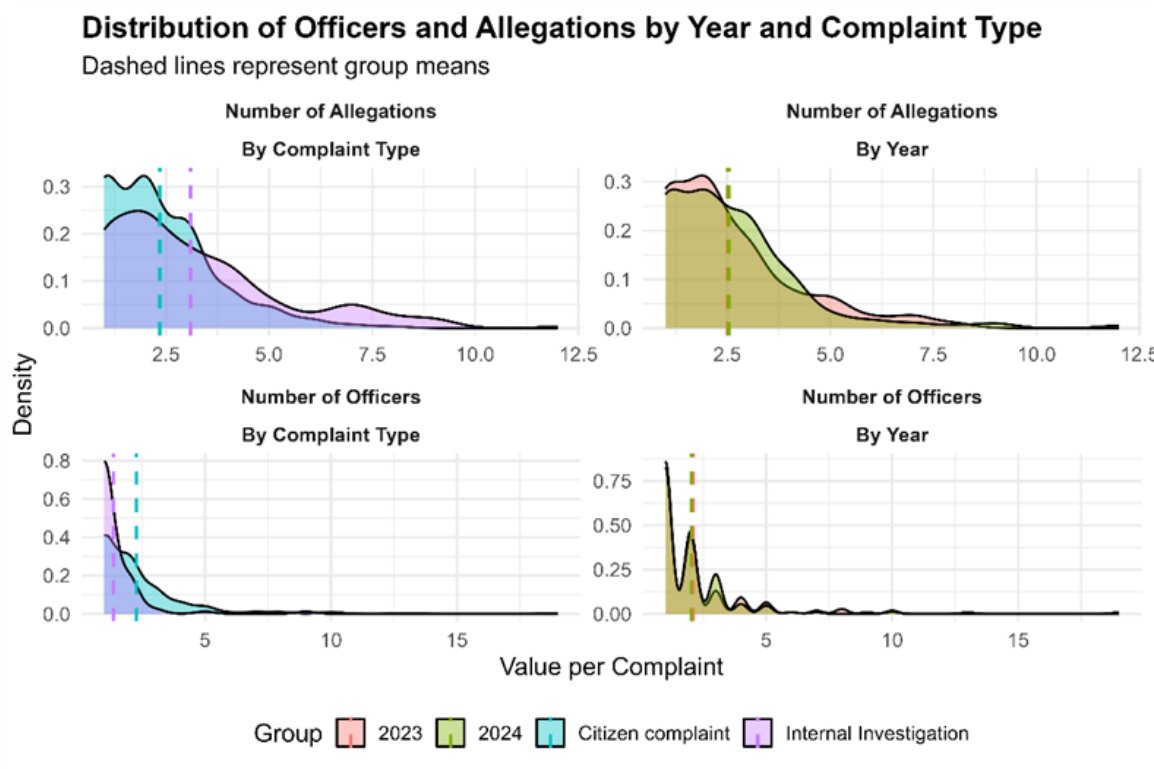


Figure 5. Density of Officers Involved and Allegations per Case by Year and Source.

Together, these findings indicate that while public complaints account for a proportionate share of allegations relative to their frequency, the nature of case complexity differs by source in ways that reflect distinct accountability dynamics. Public complaints are more likely to involve multiple personnel, consistent with the incident-driven and group-based nature of externally initiated cases in which several officers may be present or implicated in a single event. Internally generated investigations, by contrast, tend to focus on one or a few officers but may contain multiple allegations concerning different aspects of conduct. Most internal cases remain limited in scope, but a smaller subset involves several allegations within a single investigation, producing the longer right tail visible in the distribution. This pattern suggests that while many internal cases stem from routine

supervisory action, others are broader inquiries that identify clusters of related performance or conduct issues. Overall, the data suggest a structural asymmetry: public complaints tend to be broader in terms of personnel scope but narrower in terms of conduct range, whereas internal cases are narrower in terms of personnel scope but can expand in depth in a smaller number of complaints.

To better understand the composition of misconduct allegations and identify meaningful shifts in their distribution over time, we first consolidated the dozens of specific allegation codes used by BPD into a smaller set of substantively meaningful categories, consistent with the approach taken in prior reporting periods (see Table 1). This step is necessary because individual allegation types can vary widely in specificity and frequency, with some categories representing only a handful of complaints. By grouping these into broader, conceptually coherent classifications, such as Careless Workmanship, Dishonesty, Exceeding Authority, and Constitutional Policing, we can more effectively examine trends in the nature and focus of reported misconduct. Figure 6 illustrates the resulting distribution of allegations for 2023 and 2024, showing the proportion of total complaints attributed to each major category.

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Analysis of Personnel Complaints Filed Against Bakersfield Police Department Sworn Officers in 2024

Original Allegations by Simplified Category								
Hierarchical reference exhibit with raw counts by year; categories ordered by total volume (2023-2024)								
Category & Allegations	2023	2024	Category & Allegations	2023	2024	Category & Allegations	2023	2024
Careless Workmanship			Biased-Based Policing			Discourtesy		
• Unsatisfactory Work Performance	232	166	• Racial Profiling	80	79	• Discourteous Treatment of Others	119	67
• Careless Workmanship	36	44	• Discrimination Against Any Person	21	30	• Disparaging Remarks/Conduct	1	2
• Loss or Damage to Property	35	13	• Discriminatory Treatment	0	1	• Civil to Representatives of Other Agencies	1	0
• Failure to Perform Duty	12	10	Use of Force			Exceeding Authority		
• Report Preparation	12	3	• Excessive Force	57	78	• Abuse of Authority	40	67
• Supervisor - Failure to Report Misconduct	7	0	• Use of Force	8	13	• Exceeding Authority	7	6
• Improper Property Handling	2	4	• Duty to Intercede	0	2	• Unauthorized Access of Protected Information	2	6
• Entering of Identifying Information	4	0	• Improper Use of Canine	0	2	• Unauthorized Release of Protected Information	0	6
• Failure to Take Action While on Duty	2	2	• Reporting the Use of Force	1	1	• Release of Confidential Information	0	5
• Failure or Refusal to Perform	2	0	• Notification to Supervisors of Use of Force	1	0	• Unauthorized Use of Police Officer Status	2	2
• Performance	2	0	• Use of Force, Supervisor Responsibilities	0	1	• Access to the Internal Affairs or Personnel File	0	1
• Response to Calls	0	2	Constitutional Policing			• Supervisor - Abuse of Authority	1	0
• Domestic Violence Report Writing	0	1	• Illegal Search	39	38	• Use of Badge/Uniform/Facilities for Private Gain	1	0
• Failure to Act	1	0	• False Arrest	4	9	• Using Department Status to Gain Influence or Authority	1	0
• Failure to Report for Assignment	0	1	• Improper Handcuffing	0	6	Body Worn Cameras		
• Failure to Take Action	1	0	• Handcuffing and Restraints	1	2	• Body Worn Cameras	49	35
• Loss or Damage of Property of Another	1	0	• Unlawful Search	3	0	• Activation of Body Worn Cameras	7	5
• Loss or Damage to Property Due to Carelessness	0	1	• Handcuffing and Restraints Documentation	2	0	• BWC - Personnel Responsibilities	1	1
• Officer Response to Calls	0	1	• Juvenile Justice Violation	2	0	• BWC Activation	0	1
• Property Handling	0	1	• Search and Seizure	2	0	Dishonesty		
• Refusal to Perform Duties	1	0	• Verbal and Visual Warnings	2	0	• Work Related Dishonesty or Theft	1	27
• Report Corrections	1	0	• Contact and Temporary Detentions	0	1	• Falsification of Work Related Records	8	19
• Report Preparation Policy	1	0	• Improper Lineup	1	0	• False Statements	2	9
• Safe Keeping	0	1	Conduct Unbecoming			• Failure to Report Activities that may Result in Discipline	2	4
Criminal Conduct			• Conduct Unbecoming an Officer	29	22	• Dishonesty	0	4
• Criminal Law Violation	8	18	• Harassment	10	15	• Falsification of any Work Related Documents	0	4
• Criminal Conduct	5	18	• Insubordination	0	6	• Giving False Statement to Supervisor or Investigator	3	1
• Association With Criminal Organizations	0	3	• Conduct Unbecoming a Member of the Department	3	1	• Giving False Statements to a Supervisor	0	4
• Continued Association With Criminals	0	2	• Conflicting Relationship	1	2	• False Police Report	2	0
• (Law Violation-Criminal)	1	0	• Conduct Unbecoming	0	2	• Giving False Statements to Supervisor/Investigator	1	1
• Damage Property of Another	1	0	• Cowardice	1	0	• Misleading or Malicious Statements Against Department Member	0	2
Vehicle Operations			• Disobedience or Insubordination to constituted Authorities	0	1	• Untruthful Statement to IA or Supervisor	0	2
• Unsafe Driving Habits or Actions	5	7	• Moonlighting	1	0	• Failure to Report Contact with Other Law Enforcement Agency	0	1
• Vehicle Use	1	10	Internal Policies			Obligation to Identify		
• Unsafe Driving Habits	2	2	• Failure to Properly Report	8	4	• Furnish Name/Badge Number on Request	12	7
• Vehicle Pursuits	2	2	• Sleeping On-Duty	0	4	Equipment		
• Preventable Traffic Collision	2	1	• Violating Departmental Safety Standards or Safe Working Practices	3	1	• Care of Equipment	2	0
• Vehicle Operation	1	2	• Violation of Safety Standards	1	3	• Failure to Care for Issued Equipment	1	1
• MDC Use While Driving	1	1	• Failure to Observe Safety Rules	0	3	• Improper Use of Department Issued Equipment	1	0
• Unsafe or Improper Driving Habits	0	1	• Failure to Accept Personnel Complaint	2	0	Sexual Misconduct		
• Vehicle Operations	0	1	• Failure to Notify Change of Address	2	0	• On-Duty Sexual Relations	1	4
• Wearing of Safety Restraints	1	0	• Violating Departmental Safety Standards	1	1			
			• Attendance	1	0			
			• Court Subpoenas	0	1			
			• Employees Must be Familiar With Department Policy	1	0			
			• Failure to Adhere to Chain of Command	0	1			
			• Negligent Violation of Written Directive	0	1			
			• Purpose and Scope	1	0			
			• Report for Duty at the Specified Time	0	1			
			• Tardiness	0	1			

Table 1. Consolidated Allegation Categories Used for Analysis.

As shown in Figure 6, the overall pattern of allegations is dominated by a relatively small number of categories, which shifted markedly between 2023 and 2024. Categories such as Careless Workmanship and Discourtesy, which historically represented a large share of complaints, declined sharply in 2024. Careless Workmanship, for example, accounted for more than a third (37.5%) of all allegations in 2023 but fell to 26.5% in 2024. Discourtesy showed a similar decline, dropping from 12.9% to 7.3%. At the same time, more specific and often more serious categories increased substantially. Dishonesty increased from 2.0% to 8.3%, Exceeding Authority increased from 5.8% to 9.8%, Use of Force increased from 7.1% to 10.3%, and Criminal Conduct rose from 1.6% to 4.3%. These changes fundamentally altered the composition of misconduct complaints, reducing the dominance of generalized categories and increasing the prominence of those tied more directly to policy violations and accountability concerns.

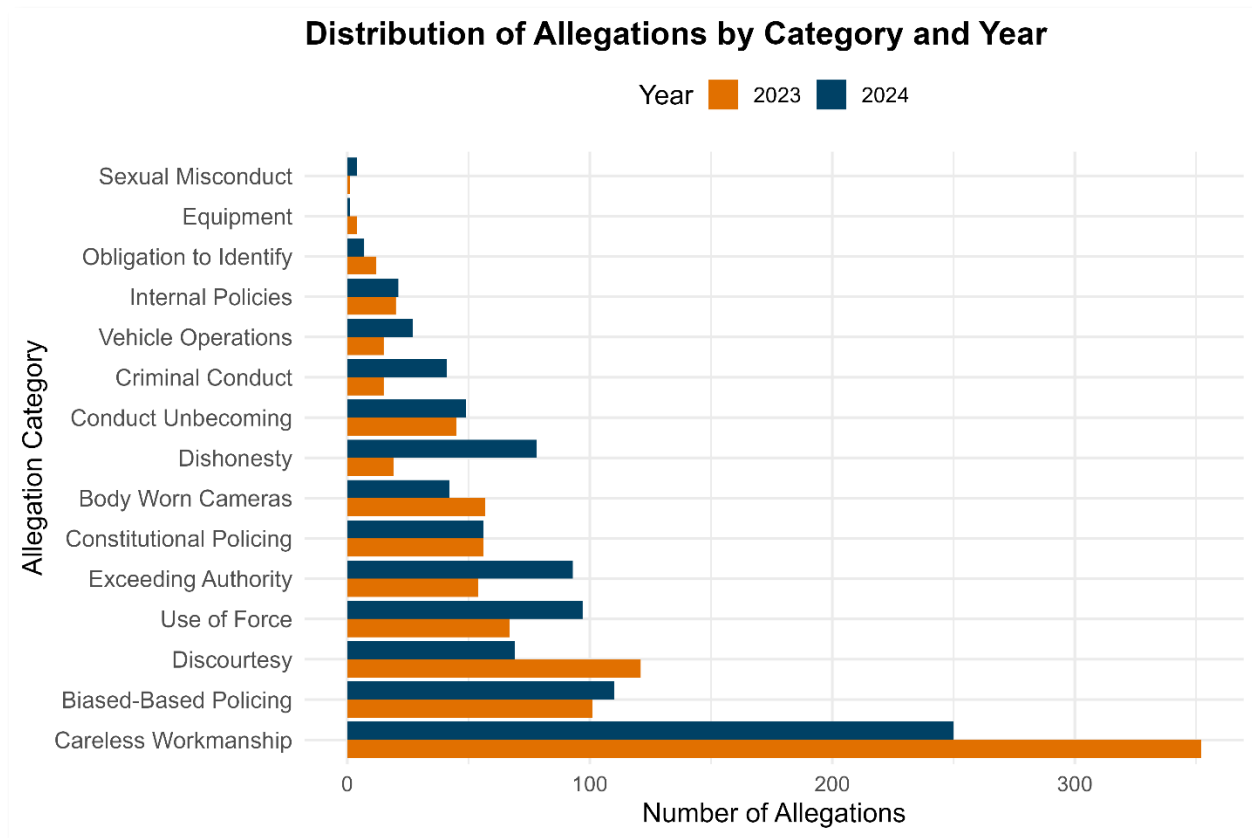


Figure 6. Distribution of Allegations by Major Category, 2023–2024.

First, we sought to formally evaluate whether the distribution of allegations changed between 2023 and 2024 in a way that could plausibly occur by chance. We used three complementary distributional metrics: Total Variation Distance (TVD), Herfindahl–Hirschman Index (HHI), and Shannon Entropy. Each captures a different dimension of how the composition of complaints may shift. The TVD measures the overall magnitude of change between two distributions. For instance, if a large share of complaints migrated from one set of categories to another, the TVD would rise even if the total number of complaints remained constant. The HHI captures changes in concentration. If allegations became increasingly clustered in a small number of categories (e.g., nearly all complaints being classified as two types instead of six), the HHI would increase. Conversely, if they spread

more evenly across many categories, it would decrease. Entropy, by contrast, reflects the diversity and unpredictability of the distribution. Higher entropy indicates a more even and varied distribution of allegation types, for example, if complaints that were previously dominated by a handful of categories became more balanced across many different types. Lower entropy indicates a narrower, more predictable complaint profile. Taken together, these three metrics provide a 360-degree view of whether, and in what ways, the structure of allegations is shifting over time.

Observed vs. Bootstrap Distribution Metrics (2023–2024)							
Metric	2023	2024	Observed Δ / TVD	Bootstrap Mean	Lower 95% CI	Upper 95% CI	p-value
HHI	0.188	0.127	-0.061	0.000	-0.021	0.021	0
Entropy	2.087	2.309	0.222	0.000	-0.082	0.079	0
TVD	NA	NA	0.191	0.059	0.035	0.086	0

Table 2. Observed vs. Bootstrapped Results for Distributional Metrics (2023-2024).

Across all three metrics, the observed changes were substantial and statistically significant (Table 2, Figure 7). The observed TVD was 0.191, meaning that approximately 19% of all complaints would need to be reassigned to different categories for the 2023 and 2024 distributions to match. In a bootstrap simulation that randomly shuffled the “Year” label across 5,000 iterations⁵, the null distribution of TVD was tightly centered near 0.058 (95% CI $\approx$ 0.034–0.087), with no simulated values approaching the observed shift. The empirical p-value ($< .001$) confirms the magnitude of redistribution far exceeds what could reasonably occur under random variation. This suggests the distribution of allegations did not occur randomly but rather was influenced by factors beyond chance or fluctuations in complaint patterns. Instead, the data show that substantive change in the distributions occurred, and one large enough to meaningfully alter how misconduct trends appear and how they must be interpreted.

The results for the HHI and entropy analysis reinforce this conclusion and provide deeper insight into the character of that reorganization. The HHI decreased by 0.060 ($p < .001$), indicating that complaints became less concentrated and more evenly distributed across categories rather than clustered in a small number of types. At the same time, entropy increased by 0.230 ($p < .001$), showing the overall diversity of the complaint profile expanded and the mix of allegation types became less predictable. Taken together, these changes suggest the complaint landscape has become both broader and more evenly distributed, reflecting a meaningful reconfiguration of how complaints are categorized. What was once concentrated in a limited set of less distinct categories now appears to be spread across a more varied and substantively richer set of allegation types.

Crucially, this redistribution is not diffuse but highly concentrated in a small number of categories. Nearly three-quarters of the overall shift is explained by just four areas: steep declines in Careless Workmanship (–11.0 percentage points) and Discourtesy (–5.6 percentage points), which are offset by substantial increases in

⁵ All bootstrap estimates were based on 5,000 replications. This number provides stable standard error and confidence interval estimates by minimizing Monte Carlo sampling error. Simulation research indicates that several thousand replications are required for convergence of percentile and bias-corrected intervals (Efron & Tibshirani, 1993; Davison & Hinkley, 1997; Hesterberg, 2015). Increasing the number beyond 5,000 yields negligible improvements in precision relative to computational cost.

Dishonesty (+6.2 percentage points), Exceeding Authority (+4.1 percentage points), and Use of Force (+3.1 percentage points). A shift this concentrated is unlikely to reflect broad behavioral changes among officers, which tend to diffuse more evenly across allegation types; instead, it points to a more structural explanation. However, BPD has not shared any changes in IA practices with the BMT, or implemented a new policy, so we cannot draw a direct conclusion.

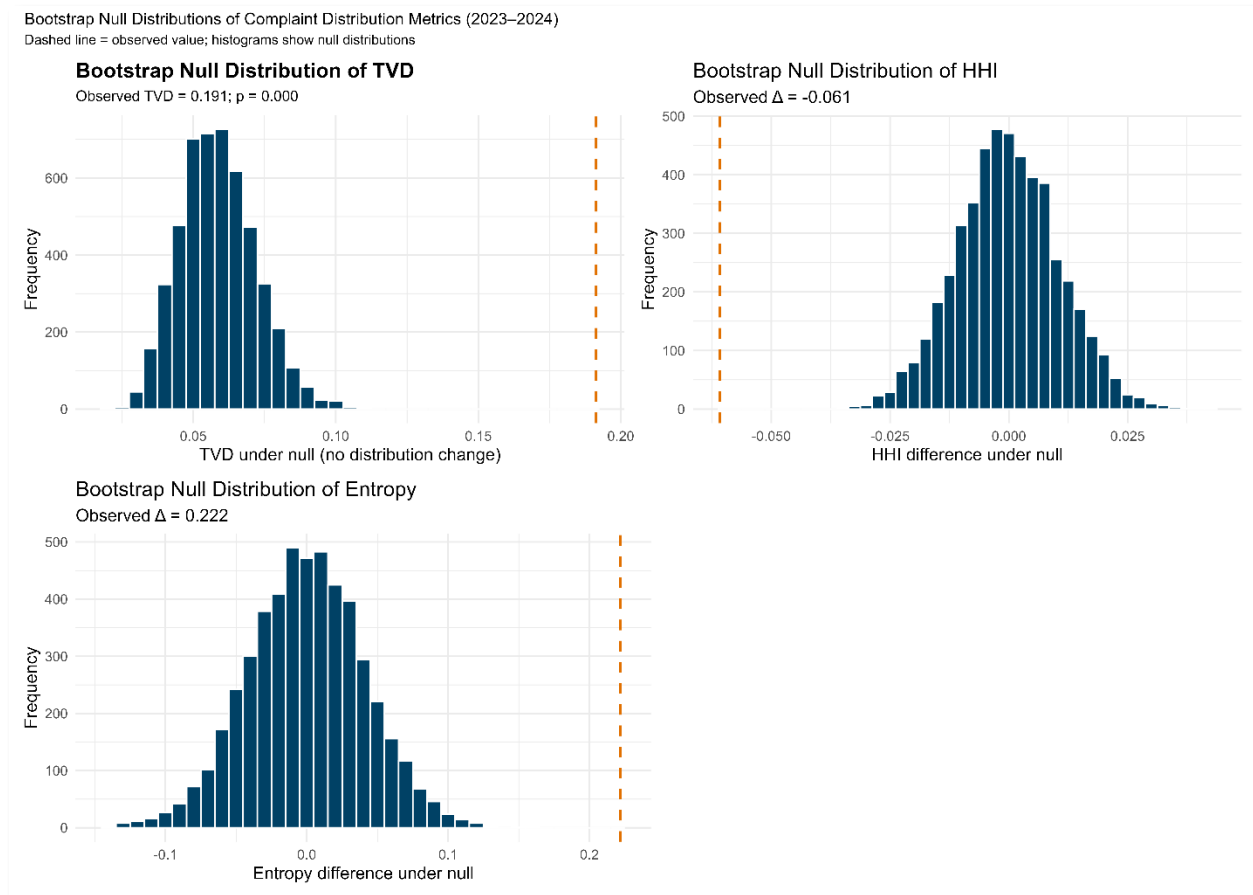


Figure 7. Bootstrap Null Distributions of Complaint Allegation Metrics (2023–2024).

The sharp variation in the number of certain types of allegations identified by BPD suggests a shift in classification practices. As noted in the BMT’s 2023 Personnel Complaint Analysis, broadly defined categories such as Careless Workmanship and Discourtesy often served as broad, low-severity classifications but sometimes included more serious conduct. As a result, while the empirical patterns are highly suggestive of a structural change in how complaints are classified, the underlying mechanism remains unclear, which is key to ensuring substantive change. Consistent with the requirements of Paragraph 144, the BMT recommends ongoing analysis by BPD management to assess the nature of the shift and to determine what policies, protocols and training are needed to support consistent identification and classification of allegations.

Officers Receiving Complaints in 2024

The officer is the unit of analysis in this section. We count the number of distinct complaints in which each officer was named and summarize those counts across sworn personnel. Because a single complaint can name multiple officers, the sum of officer-level counts will not match the number of complaints; this discrepancy is expected.

The number of officers receiving complaints and the number of complaints per officer are essentially stable between 2023 and 2024. As shown in Table 3, the average officer is associated with approximately 1.7 complaints per year, and the median is one in both years. In practical terms, the typical officer has a single complaint per year, with a minority having two or more. The complaint mix is also steady: public complaints account for most complaints and equate to approximately 1.5 complaints per officer on average, while internally generated complaints contribute a smaller, steadier layer (roughly a quarter of a complaint per officer). Exact figures for each year appear in the table.

Average Complaints per Officer by Type					
Year	Officers	Mean Total	Median Total	Mean External	Mean Internal
2023	216	1.71	1.00	1.43	0.28
2024	206	1.73	1.00	1.47	0.26
Note: Counts are officer-level averages. Each complaint can involve multiple officers, so totals will not match complaint counts.					

Table 3. Average Complaints per Officer by Type of Complaint.

Next, we examine how complaints are distributed across officers rather than how many the average officer receives. Inequality metrics and concentration curves indicate a skewed distribution in both years, with a relatively small segment of officers accounting for a disproportionate share of all officers named in complaints. We include three complementary measures to quantify concentration. The Gini coefficient summarizes how unevenly complaints are distributed across officers, ranging from zero (perfect equality, where every officer has the same number) to one (perfect inequality, where one officer has all the complaints). In our context, a higher Gini means a smaller subset of officers accounts for a larger share of complaints. The Herfindahl–Hirschman Index (HHI) provides a related perspective by summing the squared shares of complaints across officers; it gives more weight to officers with many complaints and is sensitive to “dominant” contributors. Finally, the Top-k% shares (e.g., Top 5% and Top 10%) report the fraction of all complaints attributable to the highest-complaint officers – an easily interpretable “how much do the few contribute?” metric. We use all three because they answer slightly different questions: Gini offers a single summary of overall inequality; HHI highlights concentration among the most frequently named officers; and Top-k% shares translate concentration into a concrete contribution figure that is intuitive for decision-makers. Taken together, they provide a robust picture of whether complaints are broadly shared or concentrated among a smaller cohort of officers.

As reported in Table 4, standard measures of concentration (Gini, Top-5% share, Top-10% share, and HHI) all indicate meaningful inequality in 2023 and 2024. Point estimates rise modestly from 2023 to 2024. For example, the Gini coefficient increases and the share of the top 10% ticks upward, suggesting a slight shift toward greater concentration. However, bootstrapped year-over-year differences are not statistically distinguishable from zero at conventional thresholds (Table 5).

Inequality of Complaints per Officer				
Top shares shown as percent; Gini and HHI are unitless indexes.				
	Gini	Top 5%	Top 10%	HHI
2023	0.290	14.4%	24.1%	0.006
2024	0.317	18.2%	28.6%	0.008

Table 4. Inequality in Complaints per Officer: 2023 vs. 2024.

Inequality in the distribution of complaints, therefore, remains material and persistent, with only modest, statistically uncertain change between years. This persistence indicates that a small group of officers continue to generate a disproportionate share of complaints. The stability of this concentration also implies underlying structural or managerial conditions may enable this repeated complaint behavior. The BMT recommends BPD analyze the conditions that contribute to this consistency for potential interventions.

The concentration pattern is apparent in the Cumulative Share Curve (CSC) (Figure 8) and the Lorenz curve (Figure 9). Both figures order officers by the number of complaints they received, from lowest to highest. In the CSC, the horizontal axis represents the officer percentile, and the vertical axis represents the cumulative share of all complaints. This plot answers a threshold question: by the time we reach the top X percent of officers, what fraction of total complaints has been accumulated? A curve that rises steeply near the left edge indicates a small set of officers accounts for a large share of complaints. The vertical reference at 10% allows a direct reading of the top-decile share.

Year-over-Year Differences (Bootstrap, 5,000)					
Metric	Estimate	95% CI	p	notable	
Δ Gini (2024–2023)	0.027	[-0.024, 0.077]	0.968	FALSE	
Δ Top 5% (2024–2023)	0.038	[0.002, 0.077]	0.886	FALSE	
Δ Top 10% (2024–2023)	0.045	[0.000, 0.090]	0.924	FALSE	

Table 5. Year-over-Year Differences (Bootstrap, 5,000).

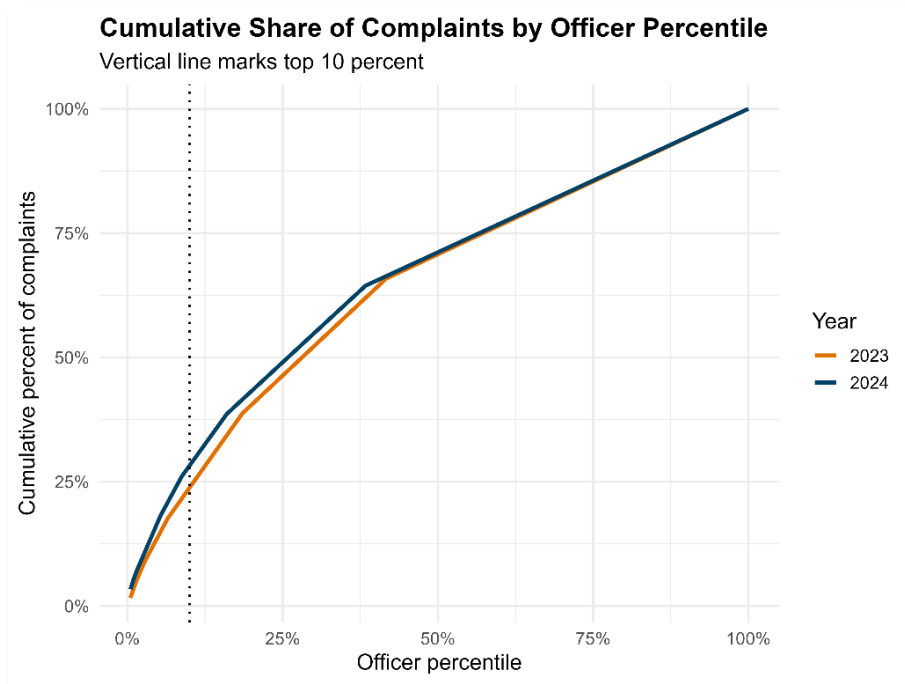


Figure 8. Cumulative Share of Complaints by Officer Percentile.

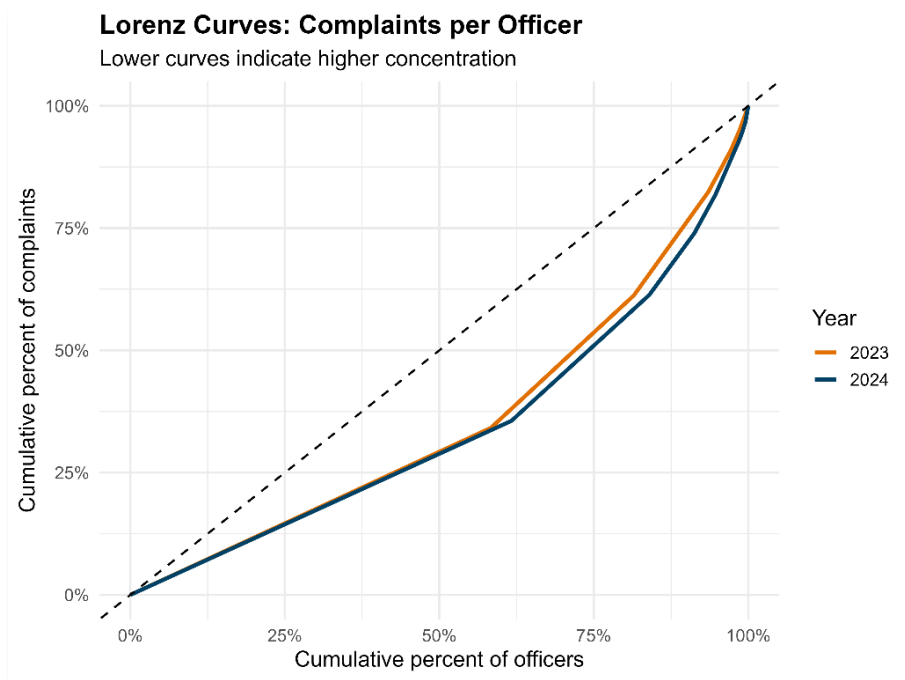


Figure 9. Lorenz Curves of Complaints per Officer.

The Lorenz curve, seen in Figure 9, presents the same information in a distributional frame. The horizontal axis is the cumulative share of officers, and the vertical axis is the cumulative share of complaints. The 45-degree line represents perfect equality, in which each additional share of officers contributes the same share of complaints. The further the Lorenz curve lies below that diagonal, the greater the inequality – e.g., fewer officers. The area between the curve and the diagonal corresponds to the Gini coefficient reported in the table, so lower curves imply higher Gini values.

In both figures, the 2024 line lies very close to the 2023 line across most of the distribution. The lower portion of the officer population accumulates complaints slowly, and the top decile accelerates quickly, which is consistent with the inequality metrics. The near overlap of the curves corroborates the bootstrap results in the year-over-year table. Complaint concentration is high in both years, and the level of concentration does not differ significantly across years. For interpretation, note that the unit of analysis is the officer, and a single complaint can name multiple officers; therefore, these curves describe how officer involvement is distributed, not how incidents are distributed. Together, these patterns indicate that overall complaint volume is driven by a recurring subset of officers rather than shifts in behavior across the broader workforce.

While the Cumulative Share Curve and Lorenz curve illustrate how complaints are distributed across the workforce, the next step is to examine the right tail of that distribution directly. We identify outlier officers within each year using Tukey’s interquartile range rule, where the cutoff is the upper fence $Q3 + 1.5 \times IQR$ computed from annual officer-level complaint counts. In 2023, the threshold for being an outlier was four or more complaints. Using this cutoff, 14 officers (6.5 percent of the workforce) were identified, accounting for 17.6 percent of all officer-complaint units that year (65 complaints). Within this group, the officers were involved in an average of 4.64 complaints (median = four), with a maximum of six. In 2024, the outlier threshold remained the same ($\geq$ four complaints). Under this criterion, 18 officers (8.7 percent) were identified, and they accounted for 26.1 percent of all officer-complaint units (93 complaints), with an average of 5.17 complaints (median = five) and a maximum of 12. Given the identical thresholds across years, 2024 shows an increase in both the number of officers identified as outliers and the number of complaints concentrated among them, indicating a heavier upper tail of the distribution.

Tukey Outliers: Size and Burden						
	Officers	Outlier Officers	% Officers Outliers	Total Complaints (Officer-Units)	Complaints by Outliers	Share by Outliers
2023	216	14	6.5%	369	65	17.6%
2024	206	18	8.7%	357	93	26.1%
<i>Officer-Units = unique officer-complaint involvements.</i>						

Table 6. Tukey Outliers, Size and Burden.

Types of Complaints Attributed to Outlier Officers

To move from the question of “how many” to the question of “what kind,” we compare the allegation mix for outliers and other officers within each year. Table 7 reports raw counts by allegation category for 2023 and 2024. Within each year, the counts are split into Total, Outlier and Non-Outlier columns, and the year headers include the number of officers and the sizes of the outlier and non-outlier groups. A vertical divider separates the 2023 and 2024 blocks, allowing the same allegation to be read straight across.

The distribution of allegation types is broadly similar for outliers and non-outliers. In both years, the highest-volume categories are the same ones that dominate the department's overall complaint activity: Careless Workmanship, Discourtesy and Constitutional Policing. In 2023, outliers were named in 45 of 260 Careless Workmanship complaints, 17 of 115 Discourtesy complaints, 12 of 41 Constitutional Policing complaints, and 9 of 59 Use of Force complaints. In 2024, the pattern persists, with higher outlier shares in several categories: 47 out of 179 for Careless Workmanship, 15 out of 58 for Discourtesy, 16 out of 45 for Constitutional Policing complaints, and 20 out of 75 Use of Force complaints. Low-count categories behave erratically simply because the numbers are small. For example, Criminal Conduct shows 0 of 8 in 2023 and 1 of 14 in 2024, and Sexual Misconduct shows 1 of 1 in 2023 and 0 of 3 in 2024. These cells should be read descriptively, unique to the facts involved, rather than as evidence of a shift.

Allegation Distribution by Outlier Trajectory				
Percentage of total complaints for each allegation type by officer trajectory				
	Desisting (n = 11)	Emerging (n = 15)	Never (n = 274)	Persistent (n = 3)
Biased-Based Policing	10.5%	7.3%	9.2%	14.9%
Body Worn Cameras	8.9%	4.9%	6.8%	2.7%
Careless Workmanship	33.1%	25.7%	32.4%	25.7%
Conduct Unbecoming	4.8%	4.4%	5.4%	4.1%
Constitutional Policing	8.1%	7.3%	5.3%	10.8%
Criminal Conduct	1.6%	0.5%	1.9%	0.0%
Discourtesy	12.1%	10.7%	12.8%	9.5%
Dishonesty	3.2%	6.3%	5.2%	4.1%
Equipment	0.0%	1.0%	0.2%	1.4%
Exceeding Authority	4.0%	9.7%	6.9%	13.5%
Internal Policies	0.8%	3.4%	2.3%	2.7%
Obligation to Identify	1.6%	2.4%	0.6%	0.0%
Sexual Misconduct	0.8%	0.0%	0.3%	0.0%
Use of Force	7.3%	11.7%	9.3%	10.8%
Vehicle Operations	3.2%	4.9%	1.6%	0.0%
Note: Percentages sum to 100% within each trajectory group.				

Table 7. Allegation Distribution by Year and Outlier Status.

We tested whether the overall mix differs across groups. A chi-square test of the distribution of allegations by trajectory, using a simulated p-value to handle small cells, provides evidence of different mixes across groups. The pooled test across trajectories yields a simulated p-value of about 0.03. The standardized residuals clarify the sources of these differences and identify a coherent set of categories that consistently drive differences. Outliers appear more frequently than expected in Constitutional Policing, Exceeding Authority, Obligation to Identify, Vehicle Operations, and Equipment, and less frequently in Criminal Conduct, Discourtesy and Careless Workmanship. Several of these deviations are nontrivial. For example, the residual for Constitutional Policing is 2.21 for outliers, and the residual for Vehicle Operations is 2.26, which indicates that outliers contribute disproportionately to these allegation types relative to their overall volume.

Allegation Distribution by Outlier Trajectory				
Percentage of total complaints for each allegation type by officer trajectory				
	Desisting (n = 11)	Emerging (n = 15)	Never (n = 274)	Persistent (n = 3)
Biased-Based Policing	10.5%	7.3%	9.2%	14.9%
Body Worn Cameras	8.9%	4.9%	6.8%	2.7%
Careless Workmanship	33.1%	25.7%	32.4%	25.7%
Conduct Unbecoming	4.8%	4.4%	5.4%	4.1%
Constitutional Policing	8.1%	7.3%	5.3%	10.8%
Criminal Conduct	1.6%	0.5%	1.9%	0.0%
Discourtesy	12.1%	10.7%	12.8%	9.5%
Dishonesty	3.2%	6.3%	5.2%	4.1%
Equipment	0.0%	1.0%	0.2%	1.4%
Exceeding Authority	4.0%	9.7%	6.9%	13.5%
Internal Policies	0.8%	3.4%	2.3%	2.7%
Obligation to Identify	1.6%	2.4%	0.6%	0.0%
Sexual Misconduct	0.8%	0.0%	0.3%	0.0%
Use of Force	7.3%	11.7%	9.3%	10.8%
Vehicle Operations	3.2%	4.9%	1.6%	0.0%
Note: Percentages sum to 100% within each trajectory group.				

Table 8. Allegation Distribution by Outlier Trajectory.

To examine whether the type of allegation varies with the evolution of outlier status, we shift our focus from counts to composition. For each allegation category, Table 8 shows the percentage of complaints attributed to officers in four trajectory groups: Desisting (outlier in 2023, not in 2024; $n = 11$), Emerging (not in 2023, outlier in 2024; $n = 15$), Never (not an outlier in either year; $n = 274$), and Persistent (outlier in both years; $n = 3$). Percentages sum to 100 within each column, so the table compares profiles rather than volumes. The unit remains the officer. Because a single incident can name multiple officers, these compositions describe officer involvement, not incident counts.

Reading across the columns shows the pattern is broadly consistent. The categories that dominate the department overall – Careless Workmanship, Discourtesy and Constitutional Policing – also dominate the mix within each trajectory. The Never group shows a sizeable share in Careless Workmanship, which aligns with the overall distribution. Emerging officers exhibit somewhat higher shares in Constitutional Policing, Exceeding Authority and Vehicle Operations, while Persistent officers show higher percentages in Bias-Based Policing and Exceeding Authority. However, the Persistent column is based on only three officers, so its percentages are inherently unstable and should be interpreted cautiously.

We tested these column profiles formally. A chi-square test of allocation distribution across the four trajectories, using a Monte Carlo p-value to account for small cells, does not provide strong evidence of different mixes (simulated p-value ≈ 0.048). The standardized residuals identify the specific cells that drive this result. Emerging officers show higher-than-expected levels in Exceeding Authority, Obligation to Identify, Equipment, and Vehicle Operations. In contrast, Never officers show higher-than-expected levels in Careless Workmanship and lower-than-expected levels in Constitutional Policing and Vehicle Operations. Persistent officers show positive residuals in Biased-Based Policing, Constitutional Policing, Exceeding Authority and several other categories, although these estimates are sensitive to small sample sizes.

Taken together, the findings indicate modest but statistically detectable differences across trajectories, driven by a limited number of categories with positive residuals. At the same time, the broader pattern remains dominated by the same high-volume allegation types that characterize the department as a whole. Thus, a distinct allegation signature does not define the trajectories. Officers who appear as outliers, whether in one year or across multiple years, are most often implicated in the same categories that produce the most complaints department-wide.

Examining the Network Structure of Officers Receiving Complaints in 2024

To move beyond simple counts of complaints and identify deeper patterns in how they are distributed across the organization, we conducted a social network analysis (SNA) of officer involvement in complaints filed in 2024. This approach enables us to examine not only how frequently individual officers appear in complaints but also their position within the broader structure of co-involvement. For example, whether complaints tend to cluster around a small subset of officers, whether those officers are repeatedly named alongside the same colleagues and how tightly connected are those clusters. By mapping and measuring these relationships, we aim to identify where complaints are concentrated, how they spread across personnel, and whether certain officers or groups hold structurally significant positions within the network. These insights provide a foundation for the next stage of analysis, which explores the nature of allegations associated with the most central or frequently named officers.

The 2024 complaint network reveals complaints are not evenly distributed across the organization. Instead, they are characterized by significant concentration around a relatively small number of officers who appear repeatedly and often in association with one another. Across the network, most officers are connected by one or

two complaints. Still, a subset of individuals emerges as structural hubs (i.e., officers who are repeatedly named), forming the backbone of the network's connectivity. These individuals exert a disproportionate influence on the overall shape and cohesion of the network, linking otherwise separate clusters and serving as bridges between different groups of co-involved personnel. This analysis does not identify culpability of conduct, but rather the relationship and connectivity of officers receiving complaints.

Top Co-Involvement Hubs (2024)					
Officer	Outlier	Complaints	Partners	Shared Complaints (Weighted)	Betweenness
7LCP2M	TRUE	12	20	29	0.042
AX3TQ9	TRUE	5	26	28	0.050
C5AJ8K	FALSE	2	25	26	0.024
D7XP3Q	FALSE	3	25	26	0.024
E0VZ1S	TRUE	7	15	24	0.030
GQ58LW	FALSE	2	23	23	0.117
JN6K4T	TRUE	4	23	23	0.045
K1RZ6Y	FALSE	3	22	22	0.063
M2HF9X	FALSE	2	21	22	0.013
Q4Z8JH	FALSE	2	20	21	0.019
R8F3MG	FALSE	2	20	20	0.022
T9Y4EP	TRUE	5	14	20	0.015
V0B7ND	FALSE	2	19	19	0.039
W2L6HB	FALSE	2	19	19	0.020
ZN1R0U	FALSE	2	18	18	0.006
Note: Betweenness centrality measures how often an officer lies on the shortest connection paths between other officers in the complaint network. Officers with higher betweenness act as key connectors or 'bridges,' linking otherwise separate groups of complaints or personnel.					

Table 9. Network Hubs, 2024.

The overall network density is low, indicating most officers are not routinely named together. However, the distribution of connections is highly skewed, with a minority of nodes accounting for a large share of ties. These high-degree nodes, officers with frequent co-involvement, not only accumulate more complaints individually but also appear in multiple overlapping clusters. This suggests that patterns of co-naming are not random; rather, recurrent pairings and triads form identifiable sub-networks, often centered on the same few individuals. The full network layout, with outliers identified, is shown in Figure 10.

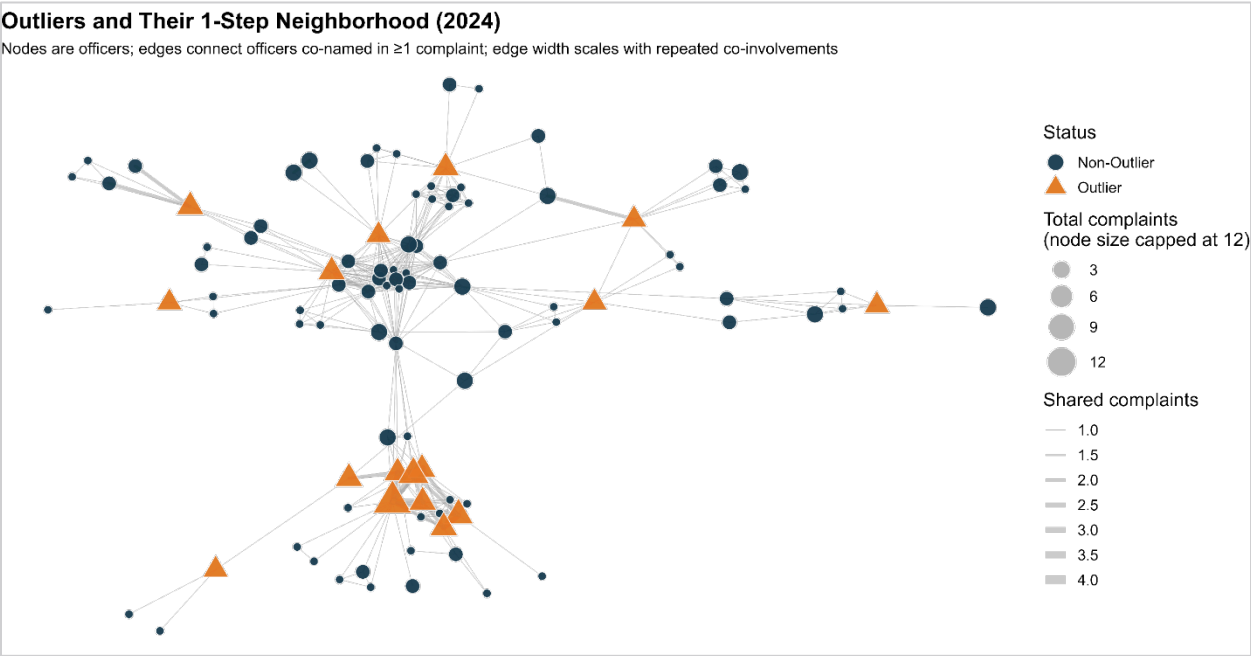


Figure 10. 2024 Complaint Network Graph.

Repeated co-involvement among certain officers is particularly notable (Table 10). Analysis of tie weights (i.e., the frequency with which the same two officers are named together) reveals that recurring relationships rather than one-time connections drive a substantial portion of network activity. In some cases, the same pairs or small groups of officers appear together across three, four or more complaints, indicating persistent co-association that may reflect shared assignments, exposure patterns or operational practices.

Total Weight by Tie Type – 2024	
Tie Type	Total Weight
Cross	10.000
None - None	6.000
Outlier - Outlier	35.000
Note: Total weight represents the sum of all edge weights associated with each tie type in the network.	

Table 10. Repeated Co-Involvement by Tie Weight.

Network centrality measures reinforce this pattern. Officers identified as hubs consistently score higher on degree, betweenness, and eigenvector centrality metrics, indicating that they occupy more connected and structurally prominent positions within the complaint network. High betweenness values show that certain officers link otherwise separate clusters, while elevated eigenvector scores indicate proximity to other well-connected individuals. These results describe the configuration of relationships among officers and complaints rather than the underlying causes of those relationships. Collectively, they demonstrate that a small segment of personnel occupies positions that make them central to the network’s overall structure.

Centrality Metrics by Outlier Status – 2024					
Outlier Status	Count	Median Degree	Median Strength	IQR (Degree)	IQR (Strength)
Non-Outlier	188.000	2.000	2.000	3.000	3.000
Outlier	18.000	10.000	14.000	9.000	13.250
Note: Centrality metrics summarize network position. Degree reflects the number of ties, while strength captures the sum of edge weights.					

Table 11. Centrality Scores for High-Connectivity Officers.

Analysis of the network's mixing patterns provides additional insight into how complaint involvement is organized. The network exhibits slightly positive assortativity ($r \approx 0.12$), indicating that officers with higher complaint counts are somewhat more likely to be connected to each other than to peers with fewer complaints. This tendency toward homophily among high-complaint officers reinforces the formation of dense sub-networks, in which repeated co-involvement disproportionately occurs within the same small group of personnel. This clustering amplifies the structural influence of those officers within the network and highlights the non-random distribution of complaints across the workforce. Meaning, the relationships among certain officers drive repeated co-involvement in complaints, suggesting that specific working arrangements or assignments may be contributing to the observed patterns. The BMT recommends BPD consider all factors in reviewing the potential reasons behind this pattern.

Taken together, these dynamics are visually apparent in the full complaint network (Figure 10 above). The visualization integrates the individual findings above, including repeated co-involvement, high centrality, and assortative clustering, into a single picture of how complaint activity is structured within the department. Rather than forming a diffuse web of isolated relationships, the network coalesces around a small set of highly connected officers whose repeated appearances account for much of the observed structure. Approximately five of these officers occupy bridging positions that link otherwise separate groups and form the connective tissue that holds the network together, underscoring the extent to which this limited subset of personnel shaped the distribution of complaints in 2024.

Key Observations About Complaints Received

The persistence of a heavier tail in the complaint distribution, combined with the structural concentration revealed in the network analysis, suggests that these patterns are neither random nor easily dismissed. While the trend is concerning, benign explanations might account for the results. Each of these explanations carries some merit, but when weighed against the empirical evidence, none fully explains the persistence, concentration and reinforcement observed in the data.

One possible explanation is that rising complaint counts and heavier tails reflect improved public trust and a greater willingness to file complaints against officers, and not necessarily increased misconduct. As the department becomes more transparent and accessible, community members who previously would not have filed complaints may now feel empowered to do so. This would be a positive development because it would mean the complaint system is capturing behavior that has always existed but was historically underreported. If this assumption was a main driver, we would expect the increase in complaints to be broadly distributed across personnel. However, both the distributional and network analyses show a persistent concentration, with a small number of officers continuing to account for a disproportionate share of complaints. In addition, the network's structure, characterized by repeated co-involvement and dense clustering, consistently identifies recurring patterns linked to specific individuals.

A second explanation might be that internal oversight and supervisory practices have become more stringent, which has resulted in a higher number of complaints being documented and processed. Under this explanation, supervisors may now be forwarding incidents for review that would have been handled informally in the past, or new documentation practices may be capturing behavior that was previously not recorded. This, too, would be a positive shift toward accountability. However, a uniform change in supervisory diligence would likely result in a uniform increase in complaints across the distribution. Instead, the data identify a disproportionate rise in the number and intensity of outliers, higher maxima among the most frequently named officers and continued prominence of the same outliers.

A third explanation might be that strategic deployment decisions and assignment patterns have increased the risk of complaints for certain officers. Assignments in specialized units or high-contact environments (e.g., gang enforcement, tactical operations or crime suppression teams) tend to generate more public complaints due to the nature of the work. Officers selected for those roles may accumulate more complaints simply because they encounter more people in high-conflict circumstances. If exposure alone were driving the trend, we would expect to see similarly elevated complaint counts among all officers in those units or roles, since they face comparable levels of risk. However, this is not what the data show. Instead, complaints remain concentrated among a subset of officers, even in comparison to others within the same high-contact assignments. Moreover, the repeated pairings and overlapping clusters documented in the network analysis indicate the same individuals not only appear most frequently but also often appear together in the same context. The persistence of these patterns suggests that more than situational risk is a contributing factor.

A fourth explanation might be that shifting public expectations and social norms are at play. As public scrutiny of policing has intensified, and tolerance for aggressive tactics has declined; conduct that once was accepted may now prompt formal complaints. Under this scenario, heavier tails might reflect a lower public tolerance threshold rather than more problematic behavior by officers. However, the evidence is not fully consistent with this interpretation. A broad shift in complaints driven by increased performance expectations would likely result in more officers crossing the complaint threshold overall; yet, we continue to see a relatively small group at the center of complaint activity, with increasing cohesion within the network. We have seen the composition of this network change annually, with the majority of the outlier cohort changing fully. This structural persistence suggests a self-reinforcing pattern that cannot be explained solely by public sentiment, even if it is a factor. None of the potential explanations, even in combination, fully account for the convergence of findings. The heavier tail, despite a fixed threshold, indicates more officers are surpassing the same benchmark and those who do are accumulating complaints at higher rates. The repeated co-involvement patterns indicate that complaints are not scattered but clustered, often involving the same individuals acting in concert. The persistence of high-centrality nodes points to a small group that anchored complaint activity in 2024. The increasing structural cohesion of the network suggests that these dynamics are not isolated incidents nor the outcome of outside factors such as improved reporting and oversight. The empirical findings significantly narrow the field of plausible explanations. BPD needs to analyze complaints beyond the discipline system to assess what organizational factors contribute to such outcomes that may allow these patterns to reproduce over time.

Who Is Filing Complaints Against BPD Employees

It is important to understand the demographics of the individuals filing complaints against BPD employees. If the demographic composition of complainants mirrors that of the Bakersfield community, complaints can be interpreted as a normal component of public service. However, if some groups are disproportionately represented, that pattern may indicate differences in experiences with, or attitudes toward, the department.

Because of limitations in data collection, demographic analysis is restricted to public complaints where complainant information is recorded.

BPD received slightly fewer public complaints in 2024 than in 2023. Most cases involved a single complainant, and the average number of complaints filed per individual was just over one. A small number of repeat complainants accounted for multiple filings, but their share of total complaints remained consistent with previous years. The overall structure of complainant participation, therefore, showed little change between 2023 and 2024.

The racial and ethnic composition of complainants remained unequal relative to Bakersfield's population. Black complainants accounted for roughly one-third of all public complaints in 2024, up from about one-quarter in 2023. This group continues to be substantially overrepresented relative to its proportion of the city's population. Hispanic complainants comprised about 28% of all complainants, which is significantly lower than their share of the local population — over half of Bakersfield and Kern County residents identify as Hispanic or Latino. White complainants represented approximately the same proportion as their share of the population, while other racial or ethnic categories together accounted for a small remainder. These differences are not large enough to be explained by chance variation alone and continue the pattern observed in prior reporting years. The consistent overrepresentation of Black complainants may reflect higher levels of police contact or differing expectations of accountability. The underrepresentation of Hispanic complainants may be attributable to a range of factors, including but not limited to language limitations, uncertainty about complaint procedures, or reluctance to engage formal systems, particularly among immigrant or mixed-status households. The BMT recommends the department continue to analyze and assess its language access practices and outreach efforts within this community.

Gender patterns were stable. Men continued to file the majority of complaints, accounting for slightly more than half of all complainants in 2024. The proportion of female complainants declined slightly from the prior year, and cases with unknown or missing gender information remained uncommon. These differences were small and not statistically significant, indicating no meaningful shift in the gender composition of complainants.

Complainants in 2024 were modestly younger on average than those in 2023. The mean age declined from about 42.5 years to just under 40, although this change was not statistically significant ($t = 1.79$, $p = 0.07$). Median ages and age ranges were consistent, indicating demographic stability in age distribution.

In summary, the demographic characteristics of individuals filing public complaints against BPD employees in 2024 remained broadly consistent with 2023. The only notable and continuing pattern is the disproportionate representation of Black complainants and the persistent underrepresentation of Hispanic complainants relative to their population shares. Gender and age distributions showed minimal change. These results suggest that the population of complainants remains demographically uneven but stable.

2024 CLOSED COMPLAINTS

In 2024, BPD closed fewer complaints against employees ($n = 157$) than in 2023 ($n = 189$), a 16.9% decrease. As with the overall analysis, complaints involving professional (non-sworn) staff are excluded. Figure 11 shows the cumulative monthly totals for completed complaints. A paired-samples t -test comparing the cumulative monthly totals indicates a statistically significant difference ($t_{(11)} = -6.54$, $p < .001$, Cohen's $d = -1.89$). On average, 2024 lagged behind 2023 by roughly 23 cases per month. The difference was most pronounced during the spring and early summer months before narrowing toward the end of the year.

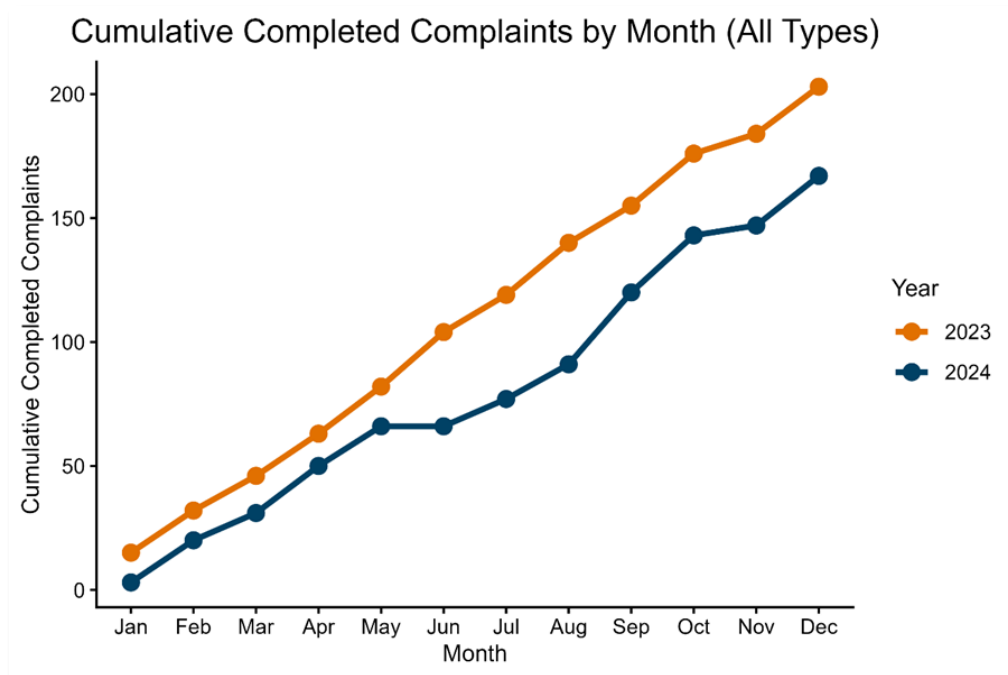


Figure 11. Cumulative Closed Complaints Completed by Month, 2023–2024.

When disaggregated by complaint type, the difference appears primarily among public complaints cases (Figure 12; $t_{(11)} = -6.36$, $p < .001$, Cohen's $d = -1.84$), indicating the cumulative number of citizen complaints closed in 2024 trailed that of 2023 throughout most of the year. By contrast, internally generated complaint cases (Figure 13) showed no statistically significant difference between years ($t_{(11)} = -1.67$, $p = .123$, Cohen's $d = -0.48$). In other words, while the overall volume of closed cases was similar across years, the pace of completion for public complaints slowed during 2024, whereas internal case processing remained relatively stable.

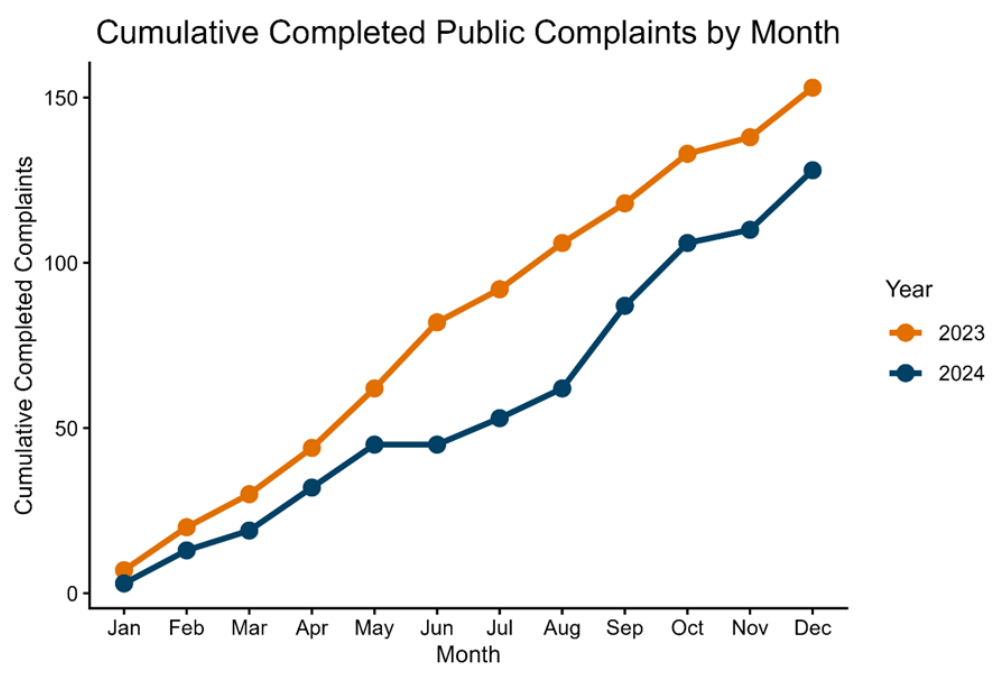


Figure 12. Cumulative Completed Public Complaints Closed by Month, 2023–2024.

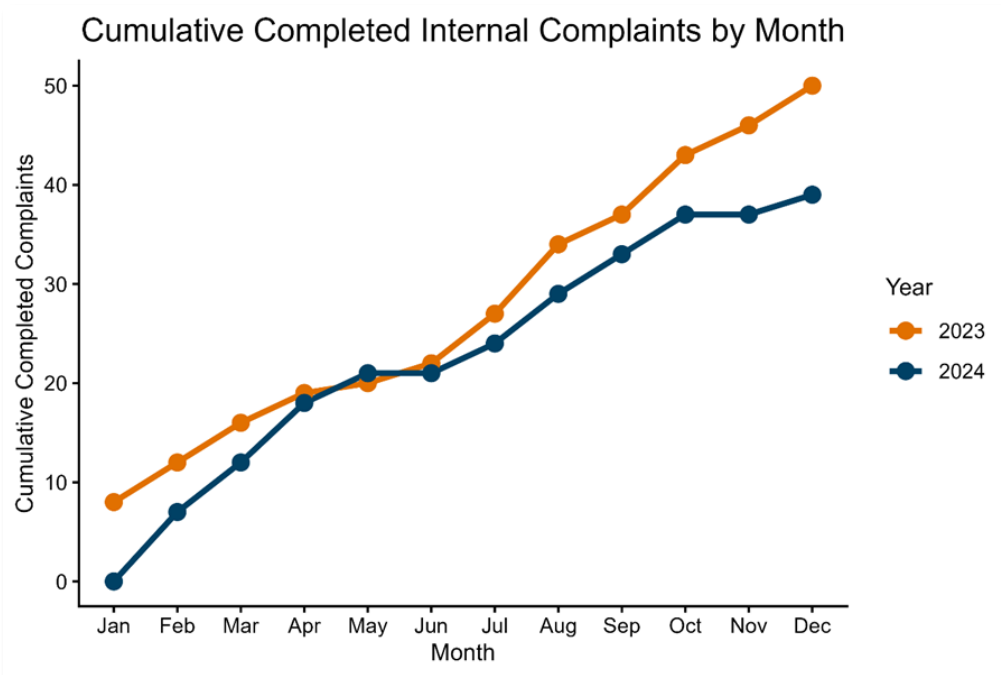


Figure 13. Cumulative Completed Internal Complaints Closed by Month, 2023–2024

Investigative Timeliness

BPD's Internal Affairs (IA) conducts investigations into complaints and then forwards for finding and determination of discipline, if warranted. IA investigations continued to show improvement in timely investigations in 2024. Figures 14 and 15 show the distribution of the number of days between receipt and forwarding the investigation for supervisory review, and between receipt and closing the complaint,⁶ respectively. Both distributions are positively skewed, with most cases being resolved within the first few hundred days of receipt.

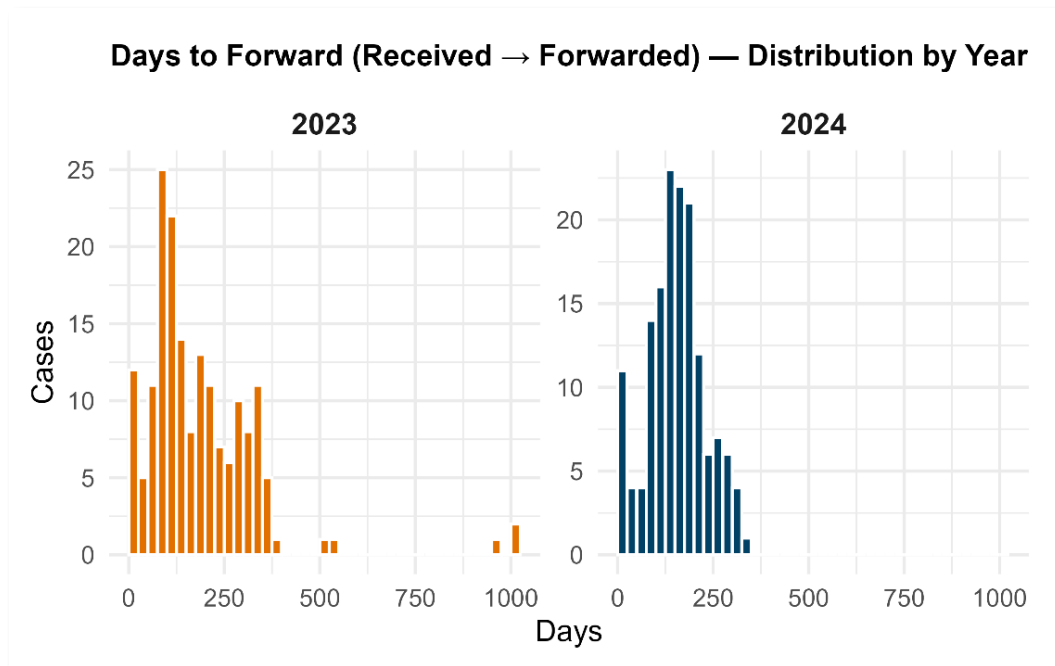


Figure 14. Distribution of Days from Receipt to Forwarding for Supervisory Review.

⁶ Closing refers to the completion of the investigation and internal review process, at which point a final disposition is rendered and the case is administratively closed in the system, and if warranted, discipline is imposed.

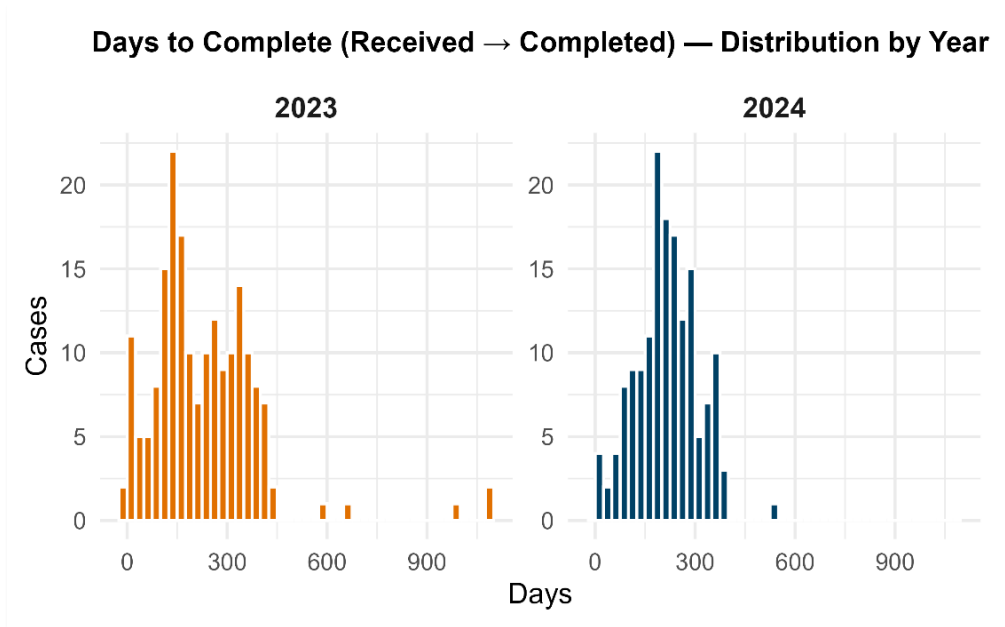


Figure 15. Distribution of Days from Receipt to Close for Complaints Investigated in 2024.

As shown in Table 12, the median time from receipt to IA’s investigation being completed in 2024 was 212 days, compared with 195 days in 2023. Although the median increased slightly, the range of completion times narrowed substantially. The interquartile range declined from 190 days in 2023 to 117 days in 2024, and the longest investigations concluded in roughly half the time of the prior year (a maximum of 530 days in 2024 compared with 1,079 days in 2023). These changes indicate improved consistency and a reduction in instances of extreme delays in the investigation process.

2024 focal; 2023 shown for reference							
Year	n	mean	median	p75	p90	iqr	max
2023	189	227.8	195	318	379.8	190	1079
2024	157	216.0	212	279	343.4	117	530

Table 12. Year-Over-Year Summary of Completion Times for All Investigations.

For the investigative time by IA, from initial routing of complaints (receipt to forwarding for supervisory review), the median duration was 159 days in 2024 and 138.5 days in 2023 (Table 13). While median forwarding times were similar, the distribution again became tighter in 2024, with the 90th percentile dropping from 329 days to 263 days. The change was not statistically significant, suggesting that the overall pace of complaint handling remained stable, while more prolonged investigations became less common in 2024.

Days to Forward (Received → Forwarded) — Summary by Year							
2024 focal; 2023 shown for reference							
Year	n	mean	median	p75	p90	iqr	max
2023	174	185.8	138.5	263.8	329.4	175.2	1015
2024	151	154.6	159.0	197.0	263.0	92.5	337

Table 13. Year-Over-Year Summary of Routing Times for All Investigations.

The completion of cases that exceed 365 days demonstrates a positive trend. In 2023, 25 cases (13.2%) met or exceeded this threshold, compared with nine cases (5.7%) in 2024, representing a 57% reduction in long-duration investigations. This decline reflects continued improvement in case management and the clearing of older backlogged matters from prior years. Table 14 lists the anonymized cases that exceeded the one-year mark.

Complaints Exceeding 365 Days (Received → Completed)								
Anonymized IA numbers for reporting; unique 4-character suffixes per case								
IA_Num_Anon	Year	Days_Complete	Dispo	I_Type	Rec_Date	Comp_Date	Num_Officers	Num_Allegations
AD2020-ML9Z	2023	1079	Not Sustained	Citizen complaint	2020-03-10	2023-02-22	3	4
AD2020-AWJM	2023	1079	Not Sustained	Citizen complaint	2020-03-10	2023-02-22	4	12
AD2021-LDOW	2023	992	Not Sustained	Internal Investigation	2021-02-10	2023-10-30	2	2
AD2021-WKAN	2023	581	Not Sustained	Citizen complaint	2021-09-07	2023-04-11	2	2
AD2021-526V	2023	427	Sustained	Internal Investigation	2021-11-02	2023-01-03	4	11
AD2021-XPCP	2023	653	Sustained	Citizen complaint	2021-11-29	2023-09-13	24	85
AD2021-EPCO	2023	392	Sustained	Citizen complaint	2021-12-14	2023-01-10	1	6
AD2022-DXTZ	2023	402	Sustained	Citizen complaint	2022-01-11	2023-02-17	2	5
AD2022-MKOP	2023	422	Unfounded	Citizen complaint	2022-01-25	2023-03-23	5	5
AD2022-VRQO	2023	367	Not Sustained	Citizen complaint	2022-02-20	2023-02-22	12	29
AD2022-YDXE	2023	378	Not Sustained	Citizen complaint	2022-02-28	2023-03-13	2	6
AD2022-7ZEP	2023	379	Unfounded	Citizen complaint	2022-04-05	2023-04-19	1	1
AD2022-XWOL	2023	440	Sustained	Citizen complaint	2022-04-12	2023-06-26	7	22
AD2022-UHHH	2023	393	Not Sustained	Internal Investigation	2022-02-07	2023-03-07	1	3
AD2022-WHB7	2023	376	Unfounded	Citizen complaint	2022-05-26	2023-06-06	2	2
AD2022-ZMPD	2023	370	Sustained	Citizen complaint	2022-06-22	2023-06-27	1	4
AD2022-LNLS	2023	417	Unfounded	Citizen complaint	2022-06-23	2023-08-14	3	3
AD2022-WAC9	2023	407	Unfounded	Citizen complaint	2022-07-11	2023-08-22	3	9
AD2022-TNHW	2023	407	Unfounded	Citizen complaint	2022-07-11	2023-08-22	2	6
AD2022-9J79	2023	405	Sustained	Internal Investigation	2022-07-21	2023-08-30	1	5
AD2022-SSUZ	2023	383	Unfounded	Citizen complaint	2022-09-07	2023-09-25	2	6
AD2022-WTNU	2023	401	Unfounded	Citizen complaint	2022-07-25	2023-08-30	3	3
AD2022-6TRJ	2023	393	Sustained	Citizen complaint	2022-08-29	2023-09-26	6	17
AD2022-ORA3	2023	371	Not Sustained	Citizen complaint	2022-09-07	2023-09-13	1	3
AD2022-1FZK	2023	390	File Only	Citizen complaint	2022-10-05	2023-10-30	1	4
AD2022-YQF3	2024	530	Unfounded	Internal Investigation	2022-12-15	2024-05-28	2	2
AD2023-ZKDL	2024	373	Unfounded	Citizen complaint	2023-02-13	2024-02-21	10	30
AD2023-14DE	2024	378	Unfounded	Citizen complaint	2023-04-17	2024-04-29	4	12
AD2023-M1C8	2024	381	Sustained	Internal Investigation	2023-04-14	2024-04-29	1	2
AD2023-HLXJ	2024	369	Unfounded	Citizen complaint	2023-04-26	2024-04-29	2	4
AD2023-XK3Q	2024	377	File Only	Internal Investigation	2023-09-20	2024-10-01	1	3
AD2023-IH5Z	2024	372	Unfounded	Citizen complaint	2023-08-29	2024-09-04	1	1
AD2023-D4V1	2024	370	Sustained	Internal Investigation	2023-09-29	2024-10-03	1	4
AD2023-B4NT	2024	373	Sustained	Citizen complaint	2023-11-06	2024-11-13	7	9

Table 14. List of Anonymized Investigations Exceeding 365 Days from Receipt to Completion.

Complaints that exceed 365 days and lack a valid basis for tolling may prevent the Department from imposing administrative discipline under the California Peace Officers' Bill of Rights (POBAR) [Cal. Gov. Code §3304(d)]. It is essential to note that this analysis is agnostic regarding the reasons for the delay. Some extended cases may involve legitimate tolling, such as concurrent criminal proceedings or external dependencies, while others may reflect administrative or procedural delays. The intent here is not to categorize which delays were justified, but rather to highlight the trend and reinforce that continued progress is both measurable and necessary.

IA's case investigation management, as identified by the reduction in cases open more than a year and the improved timeliness of IA investigations, demonstrates progress in achieving the goals of the Judgment. However, IA is but one part of the overall complaint process as the supervisory review and case disposition processes also affect the timeline for case closure. To support more timely review, IA now routes completed investigations directly to the first command reviewer rather than through the entire chain of command, which had previously extended review times. This focus on improving the timeliness of case completion is demonstrated by the data.

Overall, the department's 2024 case processing times demonstrate progress toward more consistent and timely investigations, even though median durations remained relatively stable. Continued attention to early routing and the small number of cases that exceed the one-year benchmark will be essential to sustaining these improvements. Further, the data identified a concentration of disciplinary cases among a limited number of personnel, and the recurrence of time-barred matters indicate further procedural safeguards are needed. BPD already maintains a weekly tracking spreadsheet for open investigations and disciplinary actions. The department might consider establishing timelines to ensure complaints move through the review process within defined time limits to prevent case overlap and to reinforce supervisory accountability.

Complaint Disposition

Complaint timeliness improvements coincided with a measurable shift in case outcomes. Between 2023 and 2024, the proportion of *not sustained* findings declined sharply, from 12.2% to 4.5%, while the shares of *sustained* and *unfounded* complaints increased modestly, 3.9% and 2.4% respectively (Table 15). The overall configuration of dispositions differed significantly between years ($\chi^2 = 10.07$, $p = .030$, Monte Carlo 5,000 replicates). Standardized residuals indicate the change was almost entirely concentrated in the *not sustained* category, which appeared more frequently than expected in 2023 and less frequently than expected in 2024. Other dispositions remained within expected bounds.

Complaint Dispositions by Year and Change (2023–2024)							
Includes counts, percentage share, and year-to-year change							
Disposition	2023 Count	2024 Count	2023 %	2024 %	Δ Count	Δ Percentage Points	% Change
Unfounded	87	76	46.0%	48.4%	-11	+2.38	-12.6%
Sustained	77	70	40.7%	44.6%	-7	+3.85	-9.1%
Not Sustained	23	7	12.2%	4.5%	-16	-7.71	-69.6%
Exonerated	0	3	0.0%	1.9%	3	+1.91	NA%
File Only	2	1	1.1%	0.6%	-1	-0.42	-50.0%

Table 15. Complaint Disposition Information for 2024 Compared to 2024.

As the share of delayed or backlogged cases declined, so did the proportion of indeterminate (“not sustained”) results. These shifts in complaint outcomes raise the question of whether particular dispositions require more extensive review or reflect process inefficiencies, an issue examined next by comparing investigation duration across findings.

Investigation times varied across disposition categories in both 2023 and 2024, though the overall spread of case durations narrowed substantially in 2024. As shown in Figure 16, each box represents the middle 50% of cases, with the horizontal line marking the median investigation time and the whiskers indicating the broader range of durations. sustained and unfounded cases tended to close more quickly than those resulting in not sustained findings, a pattern consistent with prior reporting periods. In 2023, the median duration for sustained cases was 168 days, compared with 235 days for unfounded cases and 265 days for not sustained cases. By 2024, these differences diminished considerably, with median times of 223 days for sustained, 209 days for unfounded and 138 days for not sustained cases.

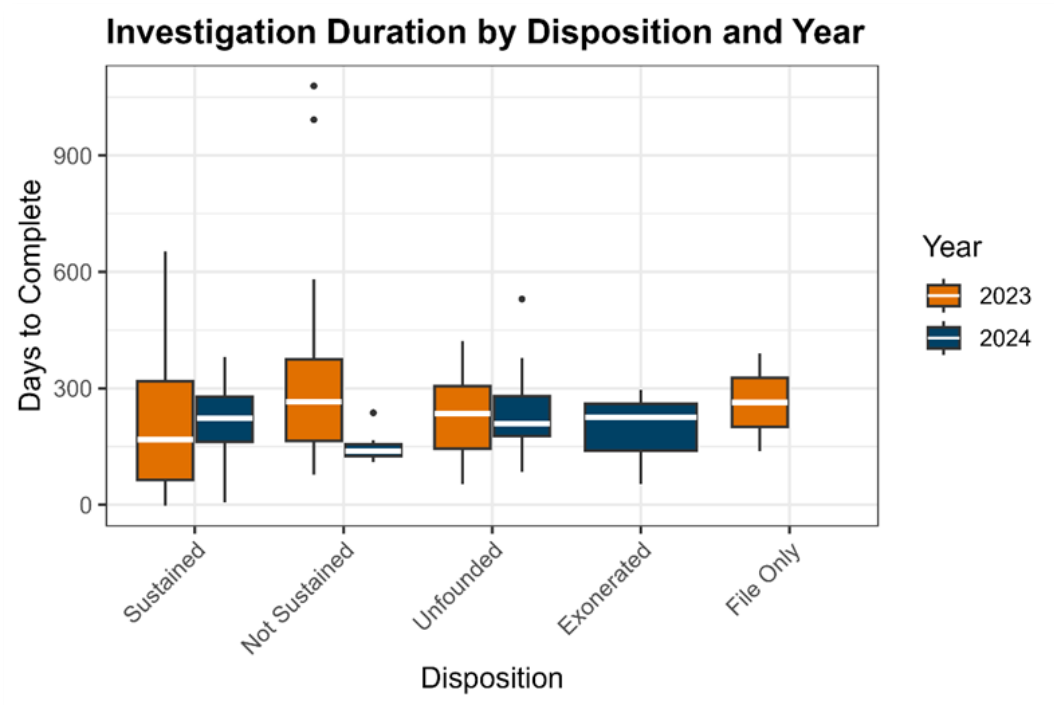


Figure 16. Median and Interquartile Range of Investigation Duration by Disposition and Year.

The Kruskal–Wallis tests (Table 19) confirmed the differences in investigation duration were not statistically significant in either year ($p = 0.052$ for 2023, $p = 0.152$ for 2024), suggesting that while certain categories had historically taken longer to complete, this variation was reduced in 2024. The overall contraction of case duration across disposition types reflects a more consistent review process and fewer cases with extended times for completion. This finding aligns with the department's broader improvements in timeliness, as reflected in both the reduction in long-duration cases and the smaller number of complaints exceeding the 365-day completion threshold.

Kruskal–Wallis Test of Investigation Duration by Disposition (2023–2024)						
Nonparametric comparison of median days to completion; includes epsilon-squared effect size						
Year	χ^2	df	p-value	ϵ^2 ¹	95% CI Low	95% CI High
2023	7.720	3	0.052	0.025	–0.006	0.120
2024	5.280	3	0.152	0.015	–0.007	0.090

¹ Epsilon-squared values around .01 = small, .06 = medium, .14 = large effect size.

Table 16. Comparing investigation duration across dispositions, 2023–2024.

Taken together, these results indicate that differences in processing time across case outcomes have become less pronounced, consistent with a more uniform application of review standards. With this distributional tightening in both outcome and timeliness, the analysis now turns to the subset of cases resulting in sustained findings to examine the nature of the underlying allegations and the discipline imposed.

Sustained Allegations

We next analyze the types of allegations that resulted in sustained findings and whether changes in the distribution of misconduct categories explain the decrease in investigation times. To explore this, the following section focuses specifically on sustained allegations, comparing their distribution and characteristics in 2024 and 2023.

Whereas the preceding analysis examined complaint dispositions at the case level, this section disaggregates the data to the allegation level, allowing for a more precise understanding of the types of conduct identified as a violation of policy and whether investigative or disciplinary patterns differ over time. Each sustained finding represents a completed investigation in which at least one allegation was sustained.

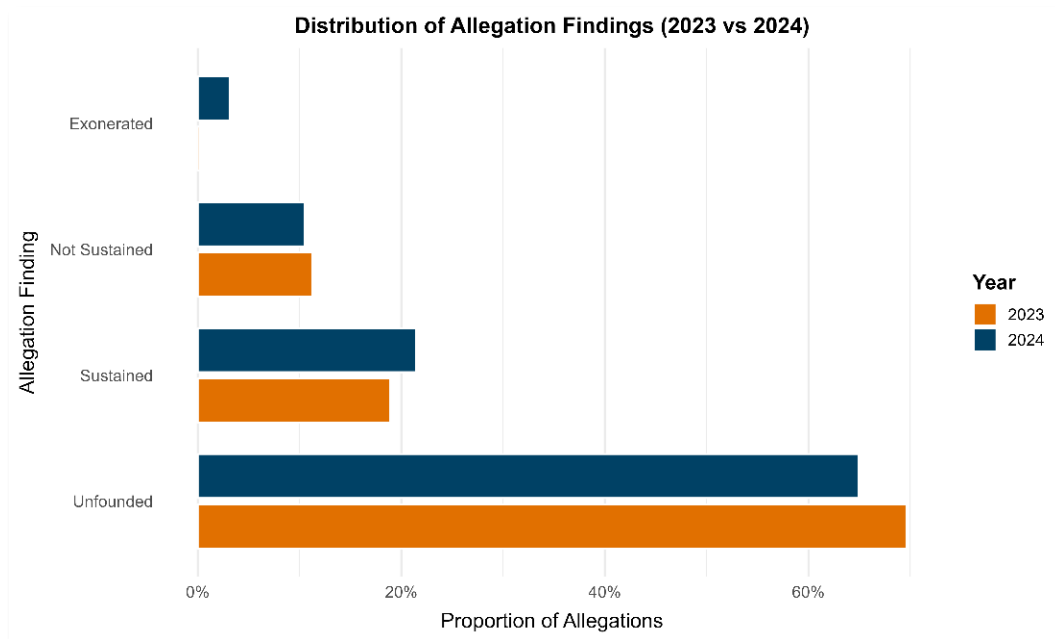


Figure 17. Distribution of Allegation Findings, 2023 vs 2024.

As shown in Figure 17, the overall distribution of findings remained dominated by a few key categories, but the composition shifted modestly between 2023 and 2024. Unfounded findings continued to represent the largest share of outcomes, although their proportion declined from 69.6% in 2023 to 64.9% in 2024, a decrease of nearly 5 percentage points. Sustained findings increased from 18.9% to 21.4%, while Exonerated determinations increased from 0.2% to 3.1%. Not Sustained findings showed a minor decrease from 11.2% to 10.5%. The magnitude of these shifts is moderate in absolute terms, but their concentration in a small number of categories indicates a meaningful recalibration of investigative outcomes rather than random fluctuation.

To formally evaluate whether the observed distributional change could plausibly present by chance, the Total Variation Distance (TVD), Herfindahl–Hirschman Index (HHI) and Shannon Entropy were computed based on the 2023 – 2024 distributions (Figures 18 and 19). The observed TVD was 0.056, meaning roughly 6% of all findings would need to be reassigned across categories for the two distributions to align. Bootstrap resampling with 5,000 iterations produced a tightly centered null distribution near 0.02 (95% CI $\approx$ 0.01–0.03), yielding a p-value $< .001$. The observed HHI difference was -0.015 ($p < .001$), indicating that findings became slightly more evenly distributed across categories. The Entropy difference of $+0.038$ ($p < .001$) similarly suggests a modest increase in diversity, with investigative outcomes less concentrated in a single type of disposition. Together, these measures confirm the 2024 distribution reflects a small but statistically reliable diversification in case outcomes (i.e., movement in the findings relative to static outcomes for any one disposition type in 2024 relative to 2023).

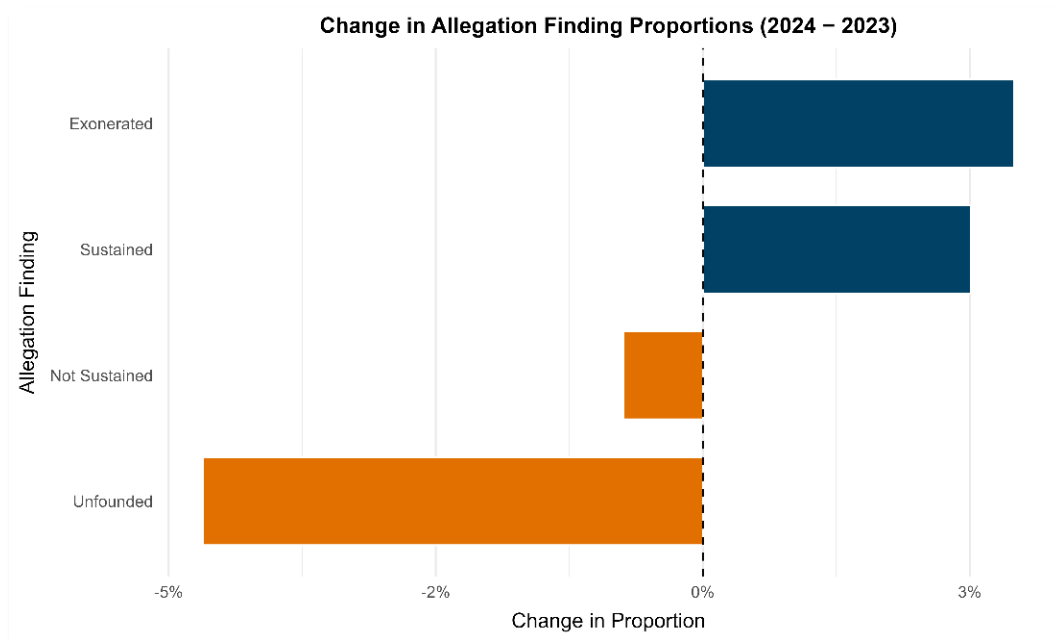


Figure 18. Change in Allegation Finding Proportions (2024 – 2023).

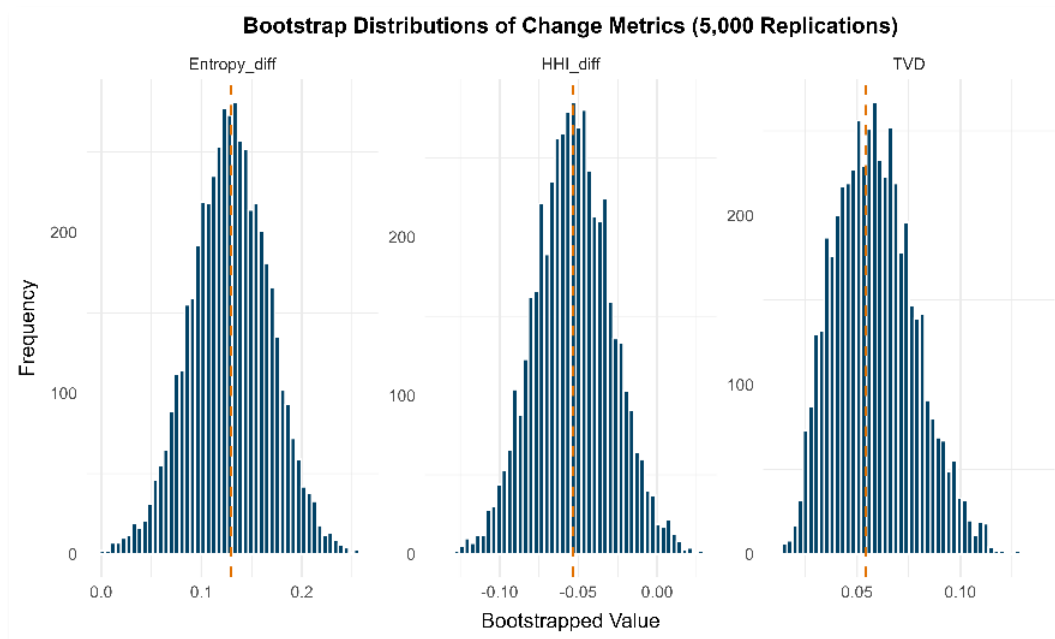


Figure 19. Bootstrap Distributions of Change Metrics (TVD, HHI, Entropy; 5,000 Replications).

Nearly all of the observed change was concentrated in three categories: Unfounded, Exonerated, and Sustained, which together accounted for approximately 93% of the total variation (Figure 18). The decline in Unfounded cases and the corresponding increases in Sustained and Exonerated outcomes were not associated with any known change in policy, investigative standards, or documentation practices. At present, there is no clear procedural explanation for this shift. The BMT will examine the investigative process for these categories as part of the next review to determine whether the observed changes reflect substantive differences in case handling or natural variation across years.

Composition Change Metrics with Bootstrap Inference					
Metric	Observed	Boot_Mean	CI_Lower	CI_Upper	p_value
TVD	0.0543	0.0588	0.0260	0.0996	0.8230
HHI Diff (2024 - 2023)	-0.0535	-0.0531	-0.1006	-0.0043	0.9848
Entropy Diff (2024 - 2023)	0.1295	0.1287	0.0514	0.2066	0.9844

Table 17: Composition Change Metrics with Bootstrap Inference.

The overall number of cases sustained increased from 18.9% in 2023 to 21.4% in 2024 (Table 18). While this change is relatively small, it suggests that investigators are substantiating a slightly higher proportion of allegations supported by available evidence. However, the increase is uneven across allegation types. Policy-based categories, such as Equipment and Body-Worn Camera, maintained sustainment rates above 90%, while conduct-based categories, including Constitutional Policing, Dishonesty and Bias-Based Policing, remained below 5%. This pattern reinforces prior observations that administrative and procedural complaints, which are often supported by documentation or video evidence, are more likely to be sustained than complaints based on situational misconduct, the majority of which are cited in the public complaints.

Sustainment Rates by Year				
Observed rates and expected binomial variance				
Year	total	sustained	rate	expected_var
2023	935	177	18.9%	0.000164
2024	639	137	21.4%	0.000264

Table 18. Sustained Cases by Year (2023 and 2024).

Overall, the findings suggest the investigative system has become slightly more balanced in its outcomes while maintaining continuity in its basic structure. The redistribution among the top categories appears to reflect incremental refinement in case review and evidence assessment rather than a major procedural overhaul.

Assessing Discipline Imposed

The 2024 discipline profile serves as the anchor for this analysis, with 2023 used as the comparison year. All disciplinary actions were standardized into a common set of categories to enable consistent tracking across years. Several similar or functionally equivalent actions were combined into broader groupings: documented counseling, oral counseling, and verbal warning were merged as Counseling/Verbal Warning; written reprimand remained a distinct category; suspension actions were consolidated under Suspension; reassignment, demotion, loss of privilege, and pay step reduction were grouped as Reassignment/Demotion/Loss of Privilege; termination was categorized as Separation; and training or performance improvement plans were classified as Remediation. Unresolved or administratively closed cases (for example, no action taken or unable to act due to time expiration) were coded as Unable (Time-Expired) or No Action (N/A). This standardization ensures comparability between years and eliminates inconsistencies in how disciplinary outcomes were labeled.

Overall volume and mix are summarized in Table 19. The 2024 totals are comparable to those of 2023, and the overall distribution of actions remains broadly stable. Written reprimands and counseling or verbal warnings comprise the largest share; suspensions appear regularly but at lower frequency, and separations are uncommon. The year-to-year distribution by severity bucket is in Table 20, with a visual summary in Figure 20.

Discipline Overview (2023 vs 2024)					
Year	Officers Disciplined	Distinct Sustained IA	Discipline Rows	Share Serious Allegations	Share Suspension or Higher
2023	84	78	273	4.0%	31.1%
2024	76	70	213	2.3%	30.5%

Table 19. Overall Discipline Overview Comparing 2023 and 2024.

Discipline Type by Allegation Severity (2023 vs 2024)				
All 2023 metrics appear first, followed by 2024 metrics for direct comparison				
Disciplinary Action	2023		2024	
	Count	Rate (%)	Count	Rate (%)
Other				
Counseling / Verbal Warning	81	32.9	71	37.4
Remediation	18	7.3	15	7.9
Written Reprimand	85	34.6	54	28.4
Suspension	20	8.1	21	11.1
Reassignment / Demotion / Loss of Privilege	20	8.1	10	5.3
Separation	17	6.9	0	0.0
No Action (N/A)	1	0.4	0	0.0
Unable (Time-Expired)	4	1.6	19	10.0
Serious				
Written Reprimand	4	14.8	3	13.0
Suspension	2	7.4	5	21.7
Reassignment / Demotion / Loss of Privilege	6	22.2	0	0.0
Separation	13	48.1	0	0.0
Unable (Time-Expired)	2	7.4	10	43.5
Counseling / Verbal Warning	0	0.0	4	17.4
Remediation	0	0.0	1	4.3

Table 20. Overall Discipline Overview Comparing 2023 and 2024.

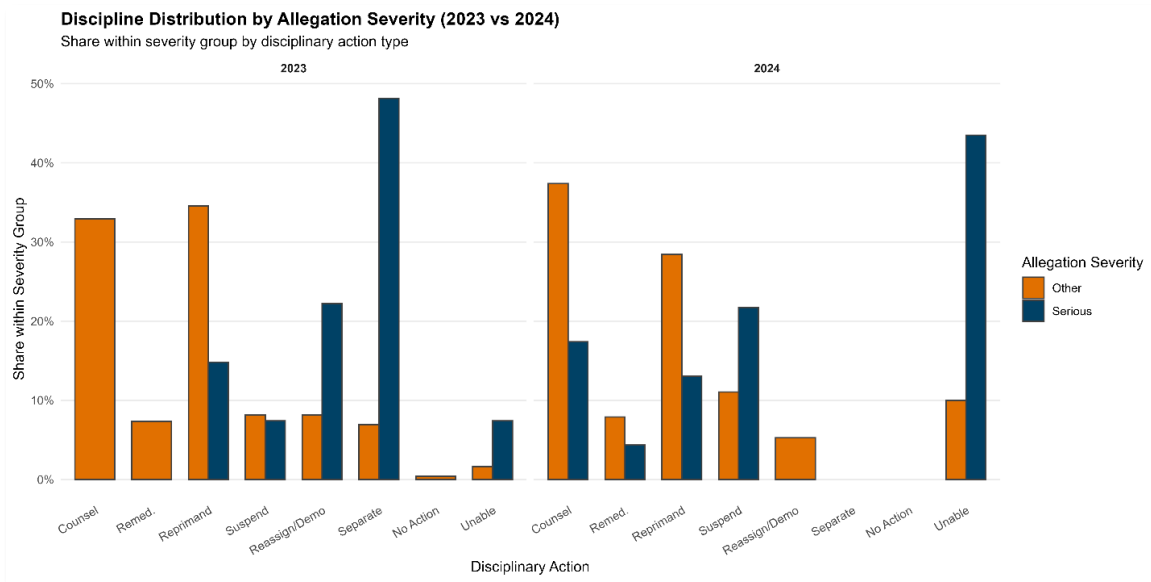


Figure 20. Comparison of Discipline Distribution by Allegation Seriousness and Year

Disciplinary outcomes in 2024 show clearer proportionality between the seriousness of sustained misconduct and the type of action imposed. For lower-severity categories (labeled Other), the most common outcomes in 2024 were counseling and written reprimands. For higher-severity categories (Serious), defined to include Use of Force, Criminal Conduct, Dishonesty, Sexual Misconduct, Biased-Based Policing and Constitutional Policing, the 2024 distribution shifted toward stronger sanctions, particularly suspensions, where misconduct was identified.

Disciplinary outcomes in 2024 show a more structured and proportionate system. Among 76 officers with sustained cases, 18 had more than one sustained complaint, representing 23.7% of all disciplined officers. This proportion is statistically unchanged from 2023 ($p = 0.99$), confirming that concentration among a small subset of personnel with multiple sustained complaints persists. Among those repeat officers, 10 (55.6%) received a stronger sanction in a later case, potentially indicating use of progressive discipline for repeated misconduct. The BMT will continue to evaluate whether this is a trend to be monitored.

Timeliness of imposed discipline improved meaningfully. The median interval between a sustained finding and final disciplinary action declined from 18 days in 2023 to 10 days in 2024 ($p = 0.006$). The upper tail of the 2024 distribution also contracted sharply, with the 75th percentile decreasing from 83 to 21.5 days and the 90th percentile decreasing from 133 to 49 days.

Cases closed in 2024 with a sustained finding and without formal discipline were limited but warrant further discussion. Two sustained cases in 2024 were time-barred under California law after exceeding the one-year statutory window for imposing discipline. The remaining “Unable (Time-Expired)” entries appear to represent newly adopted coding for employees who separated voluntarily before their investigations were completed. The BMT does not agree with combining the statutorily time-barred closures with the administrative closures for employees who leave employment while under investigation. This is a matter the BMT will discuss with BPD and evaluate going forward.

Co-Involvement Network of Officers with Sustained Allegations in 2024

These disciplinary outcomes set the context for the network analysis. Having established that sustained findings in 2024 were largely resolved within legal and policy requirements, the next question is whether those findings reflect isolated incidents or interconnected patterns of misconduct. Network analysis examines the structure of co-involvement among officers in sustained cases. If sustained misconduct was concentrated within specific groups or recurring partnerships, it would suggest joined personnel issues within these groups, might potentially be influenced by management engagement and intervention. Conversely, a fragmented or sparsely connected network would indicate sustained misconduct is largely individual rather than collective.

The sustained-only officer co-involvement network for 2024 is structurally sparse, meaning that very few sustained findings involve more than one officer. As shown in Figure 20, most sustained findings are associated with a single officer, while only a small number involve pairs or small groups of officers. When the network is filtered to display only officers who are repeatedly paired in complaints —officers who share two or more sustained findings —the structure nearly disappears. This indicates that the same officers are not repeatedly found jointly responsible for misconduct.

The result contrasts sharply with the broader complaint network, in which officers are often co-named in the same incident because multiple personnel commonly respond to or assist with a single event. Complaint co-naming, therefore, reflects patterns of operational contact rather than culpability. In contrast, sustained findings result from completed investigations and are tied to specific determinations of policy violation. The sparsity of the sustained network shows that accountability outcomes are individualized. Although officers often operate together, disciplinary responsibility is assigned based on individual actions and evidence rather than collective involvement.

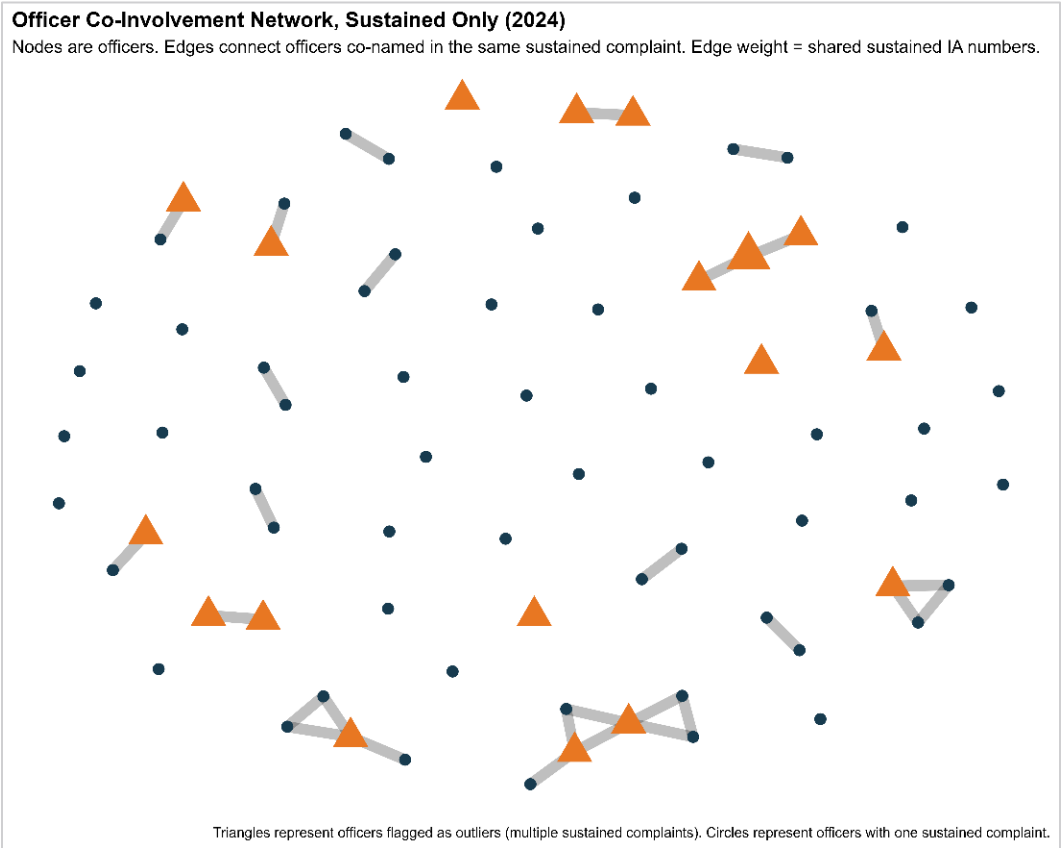


Figure 21. Co-Involvement Network for Officers with Sustained Allegations in 2024.

Centrality metrics support this interpretation. Outlier officers, those with sustained allegations in multiple complaints, show slightly greater connectedness but limited influence. As summarized in Table 21, outliers had a median of one sustained partner, compared with zero for non-outliers ($p = 0.004$). Even the most connected officers had only three or four partners and negligible betweenness values (< 0.01). The overall pattern is one of weak ties among a few repeat actors rather than any persistent core of interrelated misconduct, indicating that they do not serve as bridges connecting otherwise separate clusters. In practical terms, this means that repeated misconduct involves isolated individuals rather than an interconnected group of officers. The overall pattern reflects dispersed, independent cases rather than a coordinated or systemic network of problematic behavior.

Network Centrality by Sustained Outlier Status (2024)					
Group	n	Median Partners	Median Shared Sustained	IQR Partners	IQR Shared Sustained
Non-Outlier	58	0	0	1.0	1.0
Outlier	18	1	1	0.8	0.8
Wilcoxon p-values — Partners: 0.004, Shared Sustained: 0.004					

Table 21. Centrality Metrics and Co-Involvement Structure for 2024 Sustained Co-Involvement.

Network-level measures show no evidence that sustained misconduct in 2024 was concentrated among connected groups of officers. Officers with multiple sustained findings were no more likely to appear in the same cases with one another than with other officers, and no subgroup of officers showed a pattern of repeated joint involvement. Nearly all shared connections reflected a single incident rather than recurring associations. These results indicate that sustained findings represent isolated accountability events, not recurring or coordinated patterns of behavior among specific officers. Compared with the broader complaint network, the sustained network is markedly thinner and less interconnected.

Changes in the distribution of allegation types between 2023 and 2024 point to potential improvements in classification accuracy but also raise questions about consistency in coding. The department's forthcoming training and policy updates under the Judgment will be critical to ensure investigative findings and classifications are applied uniformly. BPD's implementation of those requirements will determine whether observed shifts in allegation patterns reflect greater precision or unmonitored re-labeling.

The network analysis of sustained cases adds a final layer of context. Whereas the complaint network showed dense clustering and repeated co-involvement, the network of sustained findings is sparse and individualized. Most sustained matters involve single officers, and there is little evidence of shared or repeated partnerships in substantiated misconduct. It remains unclear whether this difference reflects the evidentiary rigor of the investigation process, limitations in data capture or selective attrition. The BMT will examine this question in future reporting periods, and BPD should do the same to determine whether the current system accurately identifies systemic risk or treats each case as an isolated event.

Taken together, these findings depict an accountability structure that is stabilizing administratively but not yet self-correcting. The BMT recommends BPD use these data to identify the organizational conditions that give rise to persistent complaint concentration, procedural delays and uneven follow-through. The BMT will use the data to verify the durability of observed improvements and to conduct deeper analyses where questions remain unresolved. The integration of the Judgment requirements into routine supervisory practice will allow the department to achieve ingrained institutional accountability.

Qualitative Review – Personnel Complaint Investigations

The BMT conducted a file review of a sample of complaint investigations for 2024 to assess the overall quality of personnel complaint investigations and their management by BPD. The sample contained only sworn officers. In 2024, 157 complaint investigations were completed by BPD. These investigations resulted in four dispositions: unfounded (48.4%, n = 76); sustained (44.6%, n = 70); not sustained (4.5%, n = 7); exonerated (1.9%, n = 3) and file only (0.6%, n = 1).

We randomly selected a stratified sample of 35 (22.0%) of the completed personnel complaint investigations in 2024. Within this sample, the BMT selected 17 unfounded complaints (48.6%), 14 sustained complaints (40.0%), 3 not sustained complaints (8.6%), 1 exonerated complaint (2.9%), and no file-only complaints (0.0%). The stratified weights intentionally under-sampled sustained complaints and over-sampled not sustained and file-only complaints. This approach was adopted because the quality of investigative documentation was expected to be most consequential in cases resulting in a not sustained finding. We did not identify any file-only complaints in 2024, which is an improvement over 2023, as this category is non-standard under BPD policy. Specifically, the sampling frame employed proportionally weighted random selection by both complaint type and disposition.

The BMT and BPD are engaged in improving the department's policy and practices for personnel complaints, including intake, classification, investigation and management. This report identifies areas where additional work is needed but also signals areas where the department has made progress. Overall, investigations were adequate and included the necessary documents. The sample reviewed showed an improvement in supervisory oversight, including narratives and analysis, and misconduct identification improved through BWC footage and clearer policy application when necessary. Reviewed files had interview summaries and audio recordings of complainants. A mixture of officer-written statements and recorded interviews were completed. The complaints were received, complainants contacted and complaints resolved within required timelines to issue discipline. Key findings from the BMT's analysis follow.

DOCUMENTATION QUALITY AND CONSISTENCY

The BMT review of selected complaint investigation files confirmed the investigations are generally consistent with BPD policy and expected standards in law enforcement. BPD's protocols for complaint intake, investigation and supervisory review remain consistent with what the BMT learned previously in similar reviews. The investigation files typically included a completed complaint form that identified the name of the complainant, the date and time of occurrence, the substance of the complaint and the identity of the personnel involved. Importantly, the complaint form also identified how the complaint was communicated to BPD, either by telephone to IA, email, in person or by telephone to Watch Commanders or Dispatch. Multiple intake types were noted in our review and evidence that the department has established multiple options for making and accepting complaints is critical to demonstrating compliance with key Judgment requirements, including Paragraph 139, regarding complaint intake and content of the complaint form and brochure.

Most investigations in the reviewed sample were conducted by IA. Our review determined the investigations were generally completed in a timely manner and the quality was consistent with the expected standards in the profession. Under BPD protocols, the IA investigators are fact-finders only and do not make investigative findings or disciplinary recommendations. Within BPD, some investigations are completed by the involved member's division. Whether completed by the division or IA, all investigations are sent to the involved members'

chain of command, where the supervisors adjudicate findings and recommend corrective action in accordance with BPD policy, subject to final review and approval by the chief of police.

Our review found BPD made key gains in areas previously identified as needing improvement. We found evidence of improved supervisory review, demonstrated by detailed narratives and analysis by lieutenants, captains and others conducting chain of command reviews. We reviewed several investigations in which supervisors: identified additional misconduct not alleged during the initial complaint intake in their review of BWC video; clarified allegations by identifying the correct applicable policies or eliminating redundant allegations; modified findings and recommendations to properly align with the facts documented. This is an improvement over some past reviews and consistent with Judgment requirements, including Section VIII.D. The BMT will continue to work with BPD to ensure similar improvements that strengthen accountability and oversight of the complaint investigation process.

INTERVIEW AND INVESTIGATION

Our review identified that BPD continues to require members to complete an audio-recorded interview or a written statement when responding to allegations of misconduct. Consistent with our findings in 2023, there was no discernable method for identifying the circumstances when an officer would be interviewed or allowed to provide a written statement. In one case, (BMT24001), the department provided notice of investigation to eight officers and conducted audio-recorded interviews of all eight. However, in a different investigation, (BMT24002), the department provided notice of investigation to five officers but only two were interviewed. The BMT notes, pursuant to the revised Complaint policy and protocols, all members who are named or involved in a misconduct complaint will be audio-recorded in compliance with Judgment Paragraph 149. Under the revised policy and protocols, witness officers will still be able to provide a written statement in lieu of an interview; however, they may be interviewed when the investigator believes an interview is needed to clarify their response or to ensure all unanswered questions are addressed thoroughly and appropriately. While the BMT finds it encouraging that BPD has identified this as a key area of focus – and improvement is noted – consistency in the application of interview standards is needed.

Conduct of the Interview

BPD adheres to a consistent practice when interviewing department members. The BMT's review of interview audio recordings found that at the start of nearly every interview, the investigator announced: the date, time and place of the interview; the identity of the investigators conducting the interviews; and the names of the involved members and their representative, if any. This practice includes a clear statement of the reason for the interview and acknowledgement that the member was apprised of their applicable rights. Generally, the interviews in the file sample were conducted in person. These practices align with the Judgment requirements and accepted standards in law enforcement. During the investigation, the investigator usually asked probative questions that elicited a narrative response followed by effective follow-up questions, as appropriate. Investigators typically refrained from asking leading or suggestive questions, a requirement under Judgment paragraph 149.

However, the review did identify one investigation in which the investigator not only asked leading questions but also provided coaching to help the interviewee explain why he could not reasonably discover the misconduct of an employee the interviewee supervised. In BMT24003, the investigator made several statements that can reasonably be interpreted as coaching or suggestive, including telling the interviewee "I reviewed the cases myself and this is why you are confused." In the same interview, rather than asking the interviewee to explain why they were not aware that the subject officer had not done any meaningful work on the investigation in a timely manner, the interviewer stated, "it makes it difficult for you guys to know what's going on." In this

exchange, properly framed, probative questions would have been more focused to elicit not only the interviewee's narrative response but also information that would have assisted in assessing whether the interviewee had performed their supervisory duties appropriately. This central issue was an aspect that neither the investigation nor subsequent review addressed appropriately.

Unit Assigned

Additionally, the case referenced above, (BMT24003), was investigated at the division rather than IA. The nature of this investigation, which should have identified supervision as a potential issue, contributes to the BMT's continuing concern regarding assignment and classification of investigations. Given the potential for conflict of interest and the role of supervisors tasked with the investigation, the complaint investigation should have been assigned to IA. When investigations may require unique skill or knowledge, IA investigators should be able to reach out to subject matter experts to receive insight on an as needed basis. The BMT has had discussions with and encourages the department to establish standard operating procedures that will more clearly identify what type and category of cases will be investigated by IA or the division, an action that aligns with Judgment requirements, including Paragraphs 148 and 150.

Interviews

The opportunity remains to establish protocols and consistent standards to guide interviews of complainants or non-department witnesses. Within the sample files reviewed, the interviews of complainants and civilian witnesses were generally conducted by telephone and audio recorded. These interviews generally lacked the organization and clarity we observed in BPD's interviews of department members. However, we identified examples of good interview practices. In two investigations, (BMT24004, BMT24005), we observed the investigators use and express empathy and professionalism when interviewing complainants with emotional or mental health challenges. Overall, investigators treated complainants and witnesses in a professional manner, including explaining the different phases of the investigation process. The BMT's review of the files confirmed the continuing need for BPD to establish standards to guide interviews of complainants or non-department witnesses and support these standards with training. Additionally, the BMT continues to recommend BPD adopt a standard template, consistent with BPD policy, to guide how these interviews are to be conducted. Such practices will support Judgment goals, including those in Paragraphs 149 and 160.

Quality of Investigation

The investigative quality of the files reviewed was generally consistent with the expected standards in law enforcement. Investigators typically identified all parties involved in the incident, gathered and reviewed the available evidence, including BWC video, and asked complainants or witnesses to provide copies of any video or other evidence in their possession. These actions are consistent with Judgment requirements, including Paragraph 149.

The BMT found multiple instances of the investigator, through their review of BWC or analysis of the evidence, determining additional allegations of potential misconduct that were not originally alleged. These actions are consistent with Judgment requirements, including Paragraph 147. In BMT24006, the investigators identified key evidence that clearly showed the involved officers made two different enforcement decisions for conduct that were essentially the same. In both cases, the officers stopped drivers for driving the wrong way on a one-way street. However, in the referenced case, the complainant was ticketed, and his vehicle was impounded, while in the other incident, the driver was ticketed only. The complainant alleged his vehicle was impounded in retaliation for exercising his right to silence and for his attitude. The investigators asked probative questions that required

the officers involved to explain why the motorists were treated differently for the same vehicle code violation. The strong work of the investigators yielded substantive evidence to inform the supervisory oversight process when determining findings and recommendations for the complaint.

In another case, BMT24007, the gathering and analysis of evidence was not as strong. This case involved an anonymous complaint of inappropriate and offensive comments during roll call. Our review of the file showed that, as part of the investigation, only female employees were interviewed as witnesses. It is not clear why this gender focus for interviews occurred, as it is possible a male officer could have been offended by the comments and, minimally, could have confirmed the facts alleged as a witness. The BMT believes that, with the policy standards currently under review for implementation and training for the complaint investigation process, further improvements will be institutionalized within BPD policies and standard operating procedures.

SUPERVISORY REVIEW PROCESS

Once the investigation is completed, regardless of whether it is conducted by IA or the division, the completed investigation is forwarded to the involved members' chain of command to recommend findings and, if applicable, corrective action. This practice of ensuring supervisory review of administrative investigations is well established within BPD. Such reviews ensure supervisors are aware of allegations of misconduct against their employees but also allow them to have input with regard to tailoring corrective action to meet unique, individual circumstances. When supervisory review is completed, the Chief of Police makes the final decision.

Our review of the selected files revealed supervisory oversight is generally conducted in a manner consistent with the expected standards in the law enforcement profession. We saw several examples of good practice. In BMT24008, the commander provided detailed explanation for his concerns regarding the officer's use of force and language during the arrest. Appropriately, the case was returned for further review and analysis by other members within the supervisory chain. Overall, our review determined that the chain of command decision, supported by a narrative explanation and analysis, was becoming the norm rather than the exception. However, our review did identify some opportunities to improve the supervisory review. In BMT24006, the supervisory review did not adequately address a key factor, namely whether the complainant's car was impounded in retaliation for his attitude, despite the documented officer's comments regarding the complainant's attitude and how other drivers who have driven the wrong way were receptive to the education the officers provided. However, we reviewed another investigation in which the core issue also centered on the fairness of the officer's decision to impound a vehicle. Arising from the complaints and these two investigations, it appears BPD officers have discretionary authority to impound vehicles without any form of supervisory oversight. Moving forward, the BMT will seek more data regarding the frequency and outcome of this type of complaint and assess whether BPD should consider greater supervisory oversight of discretionary decisions that affect the property rights of persons officers encounter.

CLASSIFICATION, DISPOSITION AND DISCIPLINE

Establishing a clear and consistent classification protocol is vital to ensuring similar misconduct or improper behavior is treated in the same manner, a key tenet inherent in the Judgment paragraphs. BPD continues to work on improvements to department protocols regarding the classification of complaints and has presented the BMT with draft policies and procedures which identify the type and category of complaints that will be investigated by IA and which will be investigated by the appropriate division. In our sample, we reviewed two noteworthy cases of improper behavior or performance by an employee, with both cases emanating from the same division, and both had the issue of determining whether poor supervisory oversight was a factor to

consider. There appears to be no discernable reason to explain why one case was assigned to IA for investigation, (BMT24009), while the other was assigned to the division, (BMT24003). Our sample also included vehicle crash investigations that were completed by the division that appear to have been forwarded for supervisory review in the same manner as misconduct investigations. While the oversight of traffic crash investigations is a best practice in most law enforcement organizations, the role of IA is not clearly defined in policy relative to this process and BPD should examine the intent of the practice and ensure the intake, classification and review are consistent and the role of IA is defined in the process. The BMT anticipates that, if implemented as discussed, the revised classification and assignment protocol will align the department's classification practices with the Judgment requirements. The Judgment requirements will be applied to the BMT's future reviews.

Discipline Outcomes

Consistent with our prior reviews, for complaints where misconduct was sustained, coaching, counseling or training were the most frequent methods of corrective action. Our review sample also included cases involving substantial suspensions and loss of privileges. Disciplinary actions in 2024 appear to align with the seriousness of sustained misconduct and the BMT observed the use of progressive discipline. The use of varied sanctions signals BPD is committed to using the least intrusive sanction to remediate deficiencies, which aligns with the Judgment paragraphs and is consistent with the expected standards in the profession.

Conclusion

The 2024 analysis of BPD's personnel complaints shows improvement in procedural and internal accountability processes. Complaint management demonstrates focus on timely progression and the classification of allegations reflects closer adherence to policy definitions, although supervisory review oversight continues to play a role in ensuring proper classification and outcomes.

Complaint volumes were generally stable compared with 2023, but the composition of allegations shifted toward more specific, policy-relevant categories such as Dishonesty, Exceeding Authority, and Criminal Conduct. These shifts appear substantive, yet without a policy or systematic audit of case classification, it is unclear whether they represent genuine behavioral change or fluid administrative decisions. The BMT will use the 2024 data to provide baseline comparisons for future reports to determine whether there is in fact organizational change.

As with 2023, in 2024, a small number of officers account for a disproportionate share of complaints. Some of these outlier officers appear across years or within overlapping investigative networks. This persistence suggests structural rather than random variation, meaning there may be organizational factors influencing this outcome. The BMT recommends BPD assess those factors that contribute to repeated complaints and address them holistically.

In 2024, the length of time for investigations was shorter in duration, in part due to the decrease in the number of long-duration or time-barred cases. However, these improvements coincide with targeted managerial attention rather than the introduction of new internal workflows, automated tracking or standing audit procedures. Our analysis identified procedural variation across investigative units, incomplete documentation, and data inconsistencies that limit transparency into the overall process.

The BMT notes in 2024, disciplinary outcomes were more likely to be aligned with the seriousness of sustained misconduct than in prior years. There was also evidence of the progression of sanctions across some of the

repeated cases. Nonetheless, sustained cases remain clustered among a small group of officers, and outcomes at the upper levels of severity remain sparse and unevenly distributed. These patterns underscore the need for consistent documentation of sanction rationale and transparent supervisory review.

Demographic analyses add another dimension to accountability. Differences in complaint exposure and sustainment rates appear primarily compositional, associated with tenure and assignment rather than race or gender. However, the focused analysis of the sustained careless workmanship allegations identified a potential disparity. The BMT will continue to assess this data, given the data should be interpreted cautiously due to the overall small case counts and uneven representation across demographic groups. We encourage the BPD to continue to review its disciplinary decision-making to ensure that comparable sustained findings yield comparable sanctions.

Complaint concentration persists, and the Early Intervention System has yet to function as a fully corrective mechanism. Data limitations and inconsistent coding continue to restrict the department's ability to identify and explain emerging disparities. The absence of regular internal audits and standardized review procedures indicates that performance depends on external pressure and individual managerial attention.

Although the department has demonstrated progress in its management of personnel complaints in 2024, the lack of policy makes these gains procedural rather than structural. Policy is needed to ensure the Improvements in classification, timeliness, and proportionality are institutional and supported by audit controls. Policy implementation supported by organizational training, as called for under the Judgment, is needed. If properly implemented, these reforms should result in an accountability framework that is internally managed and self-correcting. The BMT will continue to work with the department as it seeks to achieve this goal.



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