Philadelphia’s Complaint System Against the Police: A Band-Aid on a Bullet Wound

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Abstract

Complaint systems against police officers are often cited as a means by which to reduce police misconduct and promote accountability; however, they do not necessarily function as ideally as intended. Despite Philadelphia’s transparency in its complaint data, there are many flaws with both the complaint system and adjudication process that prevent it from being truly constructive. Philadelphia’s data, like that of other cities, highlights the bleak outcomes of allegations brought against officers, with few complaints being sustained, fewer officers being found guilty, and still even fewer officers actually facing disciplinary consequences. Moreover, Philadelphia’s complaint data mirrors racial trends exhibited across the country, such as a disproportionately high representation of Black complainants, with Black residents also being more likely to report serious allegations of misconduct. This thesis utilizes data from Philadelphia and other cities in conjunction with a variety of literature to demonstrate that both in Philadelphia and across the country, complaint systems are minimally effective in providing either satisfaction on an individual level or in spurring reform on an institutional level, especially as it relates to reducing police misconduct and racial bias in policing.
Introduction

With the rising visibility of police misconduct as a major systemic issue, there have been increasing demands for transparency and mechanisms through which police officers engaging in such misconduct can be held accountable for their actions. A 2022 police violence report found that 1194 people were killed by police—more than any other year in the past decade—although the numbers all fall within a similar range, the lowest still being 1045 deaths in 2014.¹ Despite this staggering number, officers were charged with a crime in only nine of these cases. In fact, every year, research has found that “fewer than 3% of killings by police result in officers being charged with a crime,” with even fewer than 1% actually ending with conviction.² ³ In total, police shootings have accounted for over 9000 civilian deaths from 2013-2022, yet there is also a stark lack of accountability year upon year.⁴

Although the prevalence of police misconduct is by no means a recent trend, many media and activist groups are now turning their attention towards it more heavily, only to find that the data and procedures surrounding the handling of police misconduct cases are heavily veiled. Aside from the opaqueness of these processes, much of the data collected and reported by the government has also been proven inaccurate; for example, researchers from The Guardian and The Washington Post—among other news organizations—created independent databases of all


² Ibid.


officer-involved shooting deaths, finding that the federal government counted less than half of all such cases.\textsuperscript{5} Even James Comey, who was then director of the FBI, called this lack of data and blatant misrepresentation “ridiculous” and “embarrassing.”\textsuperscript{6}

Moreover, it is important to note that this data collection was focused on police-related killings and not non-fatal police violence as a whole, which runs even more rampant and is even less robustly reported and quantified. In 2019, however, USA TODAY and a nonprofit organization called the Invisible Institute in Chicago led a national effort to collect police misconduct records from “thousands of state agencies, prosecutors, police departments and sheriffs, the records detail at least 200,000 incidents of alleged misconduct, much of it previously unreported,” which included 85,000 police officers who were investigated for misconduct.\textsuperscript{7} That being said, this data was obtained from over 700 law enforcement agencies of the over 18,000 police forces in the United States and is not necessarily complete for each agency; despite these gaps, however, this data as a whole mirrors the numerous trends seen in the complaint data across individual cities, namely the lack of accountability and meaningful outcomes, as I will elaborate upon in the findings of my data analysis.\textsuperscript{8}

The alarming rampancy of police misconduct is also confirmed by self-reports among police officers, 84\% of whom stated in a survey that they have witnessed firsthand a fellow

\textsuperscript{5} Ibid.


\textsuperscript{8} Ibid.
officer using more force than was necessary. The U.S. Department of Justice’s study produced even more concerning statistics, such as the fact that 52% of officers say it is not unusual for officials to ignore improper conduct and that 61% of officers do not always report serious abuse they have observed. Even worse, 43% of officers agreed with the statement that “Always following the rules is not compatible with the need to get their job done.”

When looking at the demographic breakdown of who is a victim of police shootings—and of police misconduct in general—it is unsurprising to see that it reflects long-standing general patterns of racial discrimination in policing, particularly against Black and Hispanic individuals and even more so against men of these races. Black people are disproportionally killed by police officers every year, despite also being less likely to be armed and less likely to be threatening someone when they are killed; specifically, Black Americans were found to be 3.5 times more likely than white Americans to be killed when not attacking or holding a weapon. Looking at the total number of people killed by police shootings from 2015-2021, Hispanic Americans were almost twice as likely and Black Americans were over two and a half times more likely to be killed by the police compared to white Americans. These racial

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10 Ibid.

11 Ibid.

12 “2022 Police Violence Report.”


disparities extend beyond shootings into other forms of police misconduct, all the way from mild to egregious cases, with an even more stark divide seen when it comes to severe abuses of power.

These trends are especially pronounced in cities with high Black populations, including the city of Philadelphia, which has the fifth highest Black population of all major metropolitan areas and had the ninth highest number of police killings among major cities from 2016-2021.\textsuperscript{15} The Police Scorecard puts Philadelphia in the 26th percentile for racial disparities in deadly force, where 0% is worse and 100% is better, reflecting the bleak reality that from 2013-2021, Black Philadelphians were 5.9 times more likely to be killed by a police officer compared to white residents.\textsuperscript{17} Furthermore, Philadelphia ranked extremely poorly in terms of outcomes; although it falls in the 79th percentile for the total rate of misconduct complaints upheld, it is rated a mere 3%, 0%, and 6% for excessive force, discrimination, and criminal misconduct complaints respectively, all to which Black Americans are more likely to fall victim.\textsuperscript{18}

Overall misconduct data and statistics provided by law enforcement agencies are largely incomplete and unreliable, so another angle by which to study police misconduct is to analyze the complaints filed against police officers, which certain departments around the country make publicly available. Looking at Philadelphia’s complaint data, these aforementioned patterns of misconduct—particularly those that fall upon racially divided lines—are once again reflected in the allegations themselves as well the reported outcomes of each investigation.


\textsuperscript{16} “POLICE BRUTALITY STATISTICS & ANALYSIS FOR CITIES AND STATES: 2013-2021.”

\textsuperscript{17} CAMPAIGNZERO, “POLICE SCORECARD: PHILADELPHIA, PA,” POLICE SCORECARD: PHILADELPHIA, PA, N.D., HTTPS://POLICESCORECARD.ORG/PA/POLICE-DEPARTMENT/PHILADELPHIA.

\textsuperscript{18} Ibid.
Although some people are able to outright sue police officers and departments over instances of misconduct, legal action is often a time-consuming and expensive process where justice is still not guaranteed, making it restrictive to the vast majority of victims of police misconduct. Instead, most civilians who wish to allege police misconduct and receive justice must turn to complaint systems, a free and comparatively quicker alternative to expressing grievances against a police officer, a process that is described in further detail in the section on Philadelphia’s complaint system. As such, if complaint systems do not function properly, there is not truly an alternative option for civilians who have negative interactions with the police, since litigation is a costly process with uncertain outcomes that is typically reserved for only the most egregious violations.

Furthermore, although complaint systems are typically utilized after occurrences of police misconduct, they can still be used as meaningful predictors of future misconduct. Given that these complaint systems are the most accessible manner in which a civilian can raise allegations of misconduct against a police officer, complaint systems and their collected data can and should be utilized to learn more about incidents and handling of misconduct within police departments.

Philadelphia’s spending on Civil Rights Unit misconduct settlements has been on the rise since 2020, with its total 2022 payout of $20.7 million nearly matching the highs of $21 million in both 2018 and 2019. That being said, settlements typically only occur in highly egregious cases where there is an abundance of evidence, and without officers or police departments admitting wrongdoing. While it is easy to see the rise of civil rights violations by police officers

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and an apparent increase in positive outcomes for victims in litigated cases, looking at the city’s complaint data is far more revealing given the vast number of complaints that go unlitigated, making it more helpful in terms of understanding what comes of the majority of misconduct allegations filed against Philadelphia police officers.

**Research Question**

This thesis explores the efficacy of complaint systems against police officers in terms of reducing police misconduct and/or providing justice to victims of police misconduct, especially as it pertains to racism in policing, either on an individual or institutional level. To elaborate, the individual aspect pertains to complainants’ personal satisfaction and sense of justice with the process and outcomes of their complaints, while the institutional component addresses if and how complaint data is being utilized to spur reforms that may reduce police misconduct and/or racial discrimination in policing. In order to conduct this analysis, this thesis draws on complaint and demographic data from Philadelphia—as well as other cities for comparison—in conjunction with an array of literature on police misconduct and complaint systems against police officers. In doing so, this thesis aims to illuminate the functions, drawbacks, and trends seen across complaint systems as a whole and contextualize Philadelphia among other cities for which complaint data is reported.
Philadelphia’s Complaint System

Background

In 1971, the Philadelphia Police Department wrote that “as a general practice, no record is made by the Police Department of any civilian complaints, unless submitted in writing. There are no forms available to citizens for filing such complaints. When a written complaint is filed, it is supposed to be recorded by the police on a ‘complaint and incident report’ form (No. 75-48); but the general practice at the district level is not to record such complaints.” In 1993, however, former Mayor Edward Rendell signed Executive Order No. 9-93, titled “Procedures for Citizens Complaints Against Police,” that aimed to create a more formalized and meaningful complaint system against PPD to ensure that citizen concerns were properly investigated and addressed.

Following a 1996 court case against the PPD alleging systemic misconduct, then-Mayor Rendell “authorized monitoring that included the implementation of an ‘early warning’ system using civilian complaints and other information,” with the goal of “allow[ing] supervisors to intervene before misconduct spiraled into on-duty violence” as part of the settlement. That being said, this system was largely a failure; in 2003, an oversight committee characterized it as


“ineffective, inadequate, and unpredictable,” noting that commanders viewed the system negatively and did not seem to understand its purpose.23

This office was then entirely dissolved just before 2006 under then-Mayor John Street, which was ironically the year that Philadelphia experienced the highest number of fatal police shootings of civilians.24 In 2020, Mayor Jim Kenney finally promised to create a new “early warning” system; however, since 2018, the PPD’s Internal Affairs Board had already been paying $28,000 annually for an alert software called “IA-Pro,” which both Mayor Kenney and Police Commissioner Danielle Outlaw were unfamiliar with, revealing one example of the lack of information and other organizational failures surrounding Philadelphia’s complaint system.25

Philadelphia’s complaint system has seen some backsliding over the years, especially when PPD stopped publishing complainant and officer initials and significantly reduced the length and detail of its complaint summaries in 2019. Mayor Jim Kenney’s office attributed this change to “staffing limitations,” saying that they could not publish full complaint descriptions if they intended to release information regularly. This reasoning has been called into question, however: “At the same time, those limited personnel resources were allocated to summarize thousands of older complaint summaries. Police spokesperson Capt. Sekou Kinebrew said this was an effort to make the records consistent with one another. ‘It is most assuredly not an attempt to scrub information,’ Kinebrew wrote in an email.”26


24 Briggs and Marin, “Police Misconduct in Philadelphia: Unsealed Records Name the City’s Most Cited Cops.”

25 Ibid.

26 Max Marin, “After Promising Increased Transparency, Philadelphia Is Redacting Police Complaint Records,” Billy Penn at WHYY, January 17, 2023,
For example, a complaint that once read “The complainant, TW, 36/B/M, states that he was physically abused by Officers W and G, 17th District. According to the complainant, on 5-24-15, at 10:10 PM, he was riding his bicycle near 20th & Wharton Streets when someone called to him from a car. He continued riding his bicycle and was struck from behind by the vehicle. The complainant was knocked from the bicycle to the ground. He was then handcuffed and searched by the occupants of the vehicle before being transported to the hospital for treatment by two uniformed officers. The complainant maintains he did not know the operators of the vehicle that knocked him from his bicycle were plainclothes officers. He maintains they did not identify themselves to him as police officers, nor was he arrested or charged with a crime in connection with this incident” was stripped down to be “According to the complainant, on 5-24-15 at 10:10pm, they were physically abused by officers assigned to the 17th District.”

Watchdog groups saw these changes as a deterrent and explained that detailed summaries could be used to detect patterns of misconduct across officers. Similarly, a criminal defense attorney named Kevin Mincey “argue[d] that victims are emboldened to see they are not alone on the receiving end of misconduct by a certain officer.” These changes have greatly reduced the quality of Philadelphia’s complaint data and made it difficult to gain as much insight as was previously possible.

Today, the PPD has an official complaint process that, in their words, “was established for the purpose of investigating allegations of improper conduct by members of the Department. Upon receipt of a citizen complaint every effort is made to ensure a thorough, fair and timely investigation of the allegation(s) contained in the complaint.”

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27 Ibid.

28 Ibid.

report, the official complaint form on their website consists of an extensive list of questions, from basic personal and demographic information to details like who assisted the victim, witnesses of the incident, and questions about the officers’ appearances. This is not unique to PPD, however; most police departments employ similar systems, though their quality and efficacy may vary, as will be discussed in the section on quality of data across cities.

*Process*

The process for filing a complaint against a police officer is primarily administered by the Philadelphia Police Department’s Internal Affairs Division. Alternatively, residents have the option to file a complaint on the City of Philadelphia’s website, where the complaints are first processed through the Citizens Police Oversight Commission (CPOC) as an “impartial intermediary” before they are passed on to the Internal Affairs Division. CPOC states that its goal “is to provide complainants with a safe space to air their grievances. CPOC can also sit in on interviews with Internal Affairs at the complainant’s request or monitor investigations.”

Although the actual content of CPOC’s complaint form is virtually the same as PPD’s, as of January 2023, they have recently updated to a new case management system called Oversight by Sivil, following in the footsteps of a few other police departments.

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31 Ibid.
CPOC further explains that “This software greatly improves how we provide services to Philadelphia residents by modernizing the way CPOC receives complaints against police officers, recommendations for officer commendations, and general feedback. While only the aforementioned functions are live at the moment, other modules within Oversight by Sivil are being customized for use by every unit of our office to centralize CPOC’s work and work products and will go live in the coming months.”

Currently, the only new functionality that is available on the user end is the ability for residents to track the progress of their case online, which was not previously possible. Whether or not complainants file using CPOC, their complaint ultimately reaches the Internal Affairs Division, where investigators are supposed to contact the complainant(s) for an interview and complete their investigation within 90 days, unless they have requested additional time. If Internal Affairs finds the complaint to be credible, they send it to the police officer’s commander, who decides if the findings should be sent to the Police Board of Inquiry for a formal administrative review or if it merely mandates a “commander action,” such as a note in the officer’s file.

If the case is handed over to the Police Board of Inquiry (PBI), an internal prosecutor writes up the charges against the officer, and a hearing is held of all the evidence at hand, where the panel makes a determination as to the official outcome of the inquiry and what disciplinary action the officer(s) involved will face, if any. This recommendation is then passed on to Police Commissioner Danielle Outlaw, who can approve, deny, or adjust the disciplinary action. Once

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33 Ibid.
the punishment is finalized, the Fraternal Order of the Police union is then able to challenge the findings if they so desire.\(^\text{34}\)

Although the Internal Affairs Division’s investigation time is in theory limited to 90 days, the entire process can range from months to years. A 2021 report by PAC and PPD found that “on average it took Internal Affairs 9 days to assign an investigator, 181 days to then complete their investigation, an additional 70 days to determine charges, and lastly 197 days for the Department Advocate to hold a hearing for the matter. Unfortunately, residents waited an average of 463 days for the results of their complaints, with some waiting upwards of 637 days.”\(^\text{35}\)

To conclude, it is important to mention that PPD is not very transparent about how complaints are taken in and adjudicated; although there is a brief description on their website, this summary was not indicative of the full process.

CPOC itself acknowledges these gaps, writing that “PBI processes generally opaque to anyone who wants to understand them. The PAC/CPOC would welcome the opportunity to help develop materials with the general public in mind that would bring more transparency to these stages of the PPD discipline process… The data about the findings of the cases themselves is important to provide, but more information that clarifies how discipline charges are determined, how PBI boards are selected and trained, and the rules that PBI boards follow during hearings should also be available.”\(^\text{36}\)

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\(^\text{36}\) Ibid.
Given the current lack of information disseminated directly by PPD, providing a comprehensive overview of how complaints are handled required several external sources to fill the gaps in PPD’s description.

Civilian Oversight

CPOC was established after Philadelphians voted to create a police oversight commission in 2020 with the hope of ensuring that complaints would be appropriately investigated and disciplined; however, although it is an oversight board, they have extremely limited influence over the actual adjudication of complaints. CPOC claims to work with PBI’s “Charging Unit” to ensure that disciplinary action is enforced; however, given the lack of publicly available information into the review process, it would be difficult if not impossible to independently validate if this is truly being done.37 As of 2022, there has only been one CPOC representative on the PBI, meaning that the outcomes of all complaints are primarily determined by fellow members of the police department. In that sense, Philadelphia is starkly different from other major cities like New York City and Chicago, where complaints against police officers are handled entirely by an independent civilian community review board that is funded by millions of dollars in public money.38

Philadelphia previously had a Police Advisory Commission that investigated citizen complaints; however, due to severe underfunding and a restructuring in 2017, they now only


38 McCrone, “With No Independent Oversight, Only Cops Investigate Cops in Philly.”
review police department policies and issue reports. The chairwoman of the PAC, Ronda Goldfein, was quoted as saying, “We haven’t held hearings for a while and that’s related to resources. We have to make the decision about how to give the city the best value. In the end, our resources are better used to look at systemic issues.”

As of 2020, the PAC’s budget was $640,000, a mere 0.08% of PPD’s $776 million budget. Despite the fact that Mayor Jim Kenney promised to improve independent oversight of police misconduct and civilian complaints in a list of reforms, he proposed cutting the PAC’s funding to $525,000 in the 2020-2021 budget. When PAC was replaced with CPOC, the new organization was granted a budget of $1,900,070 for 2022-2023; despite being around four times the size of PAC’s budget from 2021-2022, this allocation still pales in comparison to other cities.

For example, in contrast, the New York City civilian review board has a $19 million annual budget and is legally required to constitute at least 0.65% of the police department’s budget; similarly, in Chicago, the police accountability office’s budget must be 1% of the police department’s, which sits at nearly $14 million. As of 2022, PPD’s budget is $788 million; as such, operating by New York City’s and Chicago’s standards, PAC’s budget should fall within

39 Ibid.

40 Ibid.


42 McCrone, “With No Independent Oversight, Only Cops Investigate Cops in Philly.”
the range of $5,122,000 and $7,880,000, making the true lack of funding even more striking.\textsuperscript{43} This is especially grave considering that in many years between 2007 and 2015, Philadelphia experienced more police shootings than New York City despite the fact that the latter city had five times the number of residents and officers. To be more specific, “roughly once a week, 390 times [between 2017 and 2015], Philadelphia police officers opened fire at a suspect. The shootings involved 454 officers, most of them on patrol. Almost always, the suspects were black.”\textsuperscript{44}

Yet another failed attempt at oversight in Philadelphia was the Use of Force Review Board implemented by PPD in 2015, which was intended to review police shootings and other incidents where “extraordinary and unanticipated actions were required,” in their words.\textsuperscript{45} Even this committee had limited reach, however, with only “the power to give administrative approval or disapproval that an officer’s actions were (or were not) in accordance with departmental policy, tell an officer they need to improve their tactics and decision making, or decide there was a training issue or a non use of force violation.”\textsuperscript{46} The review board stopped meeting altogether in 2019, and by November of 2020, 25 police shooting cases still remained unreviewed.\textsuperscript{47}


\textsuperscript{46} Ibid.

\textsuperscript{47} Ryan Briggs, “City Board Charged with Oversight of Philly Police Shootings Hasn’t Met for a Year,” \textit{WHYY}, November 23, 2020,
Philadelphia’s blatant lack of independent civilian oversight combined with its high rates of police brutality, it is essential to keep in mind that the handling of complaints and their outcomes should be taken with a grain of salt as it tends to favor the interests of police officers.

Selection Bias in the Complaints Sample

Furthermore, by virtue of the complaint process and what it entails, it is important to note that the sample of complaints is inherently skewed. Especially in the case of severe allegations, victims of police misconduct who have the time, money, and other resources necessary to bring formal litigation against the police department would be likely to do so. Usage of the complaint system instead indicates either a lack of severity in the allegation, a lack of the resources necessary to begin formal legal action, and/or a lack of belief in the formal judicial system, especially since even many litigated cases end without a sense of justice or accountability for the complainant. Beyond that, however, even the complaint process itself presents some barriers in terms of accessibility. For example, only the recently updated complaint system by CPOC allows users to easily translate the form into other languages; the original PPD complaint form presents an additional burden for those who cannot read or write English.

Moreover, the complaint form requires a lot of information that may potentially make the process somewhat restrictive or cumbersome. For example, it asks for numerous details about the officer(s) in question that complainants may not think to ask for or remember in the moment. In some of the most severe allegations such as physical abuse, per say, it seems unreasonable to expect someone to have noticed or recorded the officer’s rank, badge number, district, height,
weight, and so on. While it is not mandatory to answer these fields when filing a complaint, the lack of information likely leads to less thorough consideration of the complaint at hand.

A lack of information or the overwhelming nature of the form may dissuade victims of police misconduct from filing complaints due to expectations of an unsatisfactory outcome. Additionally, since the complaint review process involves an interview of the complainant(s), this may further discourage people from filing complaints out of fear or other reservations towards interacting with police officers, especially if they belong to a racial minority.

Furthermore, as one study describes when accounting for biases in their data analysis, “we also must consider research that individuals involved in criminal activity may be disinclined to resolve conflict through official channels. Because we have no evidence to expect differential reluctance to complain about misconduct among those involved in crime and across race, nor racial heterogeneity in how such involvement may be incorporated into adjudication of complaints, we hesitated to speculate about the direction of bias in our estimates. However, we do believe the reluctance of individuals involved in criminal activity to issue a complaint about misconduct leads us to understate the prevalence of misconduct.”

As such, when viewing the complaint data, it is important to consider that there are likely many other people with grievances against the police, both valid and otherwise, who are not represented within this sample.

Available Data and Cross-City Comparison

Describing the Data

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There are a number of cities around the country which make their complaint data publicly available, including Philadelphia, New York City, Chicago, and Detroit, among others. PPD writes that they do so because they are “committed to open and transparent engagement. This engagement includes sharing information about Complaints Against Police (CAPs) here on our accountability page and on OpenDataPhilly.org.”

There are three available data sets on Open Data Philly: the first, titled “ppd_complaints,” serves as an incident report, containing a complaint number, the date the complaint was received, the district in which the incident occurred, the general classification of the incident, and a brief summary of what occurred. The second, “ppd_complainant_demographics,” provides the demographic information of each complainant—namely their race, gender, and age—and the third, “ppd_complaint_disciplines,” provides the same demographic information but of the reported officer(s), whether the allegations were investigated, whether the findings were sustained, what the findings of the investigation actually were, and what disciplinary action the officer was given.

Only the last five years of data are maintained on OpenDataPhilly—the currently available data set ranges from January 12, 2017 to October 28, 2022—however, I was able to get the previous data as far back as January 7, 2013 from a journalist named Sam Learner who had worked with the older data for a story in The Pudding. As such, the data I used for my


analysis ranges from January 7, 2013 to October 28, 2022, consisting of a total of 6547 complaints after I cleaned it in accordance with what was necessary for my analysis, which I will elaborate upon in the subsequent section. There are notable differences between the data from 2013-2018 and the data after 2018; the former demographic data contains the initials of the complainant(s) and police officer(s) involved in each incident, which PPD stopped reporting in 2019 “after city officials learned — likely via reporting on the complaint allegations — that the letters could still be used to identify police in certain cases.”

On the other hand, the latter years of data in ppd_complaints include the date and time of the actual incident, not just when the complaint was filed, as well as officer ID numbers and the police district to which each officer is assigned, information that is unavailable for the earlier years.

In addition to the data obtained from Open Data Philly, upon request via email, the District Attorney’s office provided me with demographic data pertaining to race and poverty level categorized by police district, since the aforementioned three data sets contain a police district variable that could be used for comparison. That being said, this demographic data comes from 2021 alone whereas the complaint data ranges from 2013-2022, and I was unable to obtain demographic data sorted by police district for other years. Although Philadelphia’s racial makeup has not changed significantly on the whole, there have been significant racial shifts across individual neighborhoods and regions. As such, given both the changes in complaint data collection and reporting as well as in demographics over time, in certain portions of my data


analysis that sort by police district, I will be using a subset of the complaint data that excludes the earliest years where demographic data from 2021 may not be as helpful or relevant.

Quality of Data Across Cities

It is also interesting to note that the quality, content, and presentation of the data published by police departments vary greatly across cities. Moreover, the information published by police departments is sometimes different from what is publicly available through other sources. While Philadelphia publishes line-by-line complaint data, New York City’s Civilian Complaint Review Board publishes higher level statistical overviews of the data. Not only is their data far more informative and detailed despite not being broken out into individual complaints, but it is presented in a far more accessible manner that can be easily viewed and understood by anyone.\(^55\) In contrast, Philadelphia’s data cannot be interpreted unless you download the data sets and work with them yourself. Additionally, unlike some other cities, Philadelphia does not publish officer names; however, some of this information is available through news organizations that have requested and received limited data. For example, one WHYY article revealed the names of PPD officers who had ten or more complaints filed against them between 2015 and 2020.\(^56\)

Furthermore, although NYC’s review board does not publish the line-by-line data themselves, much of it can be accessed through alternative sources. ProPublica was able to


\(^{56}\) Briggs and Marin, “Police Misconduct in Philadelphia: Unsealed Records Name the City’s Most Cited Cops.”
obtain complaint records spanning from September 1985 to January 2020 for all closed cases involving every police officer still on the force as of the end of July 2020 with at least one substantiated allegation against them. This data is even more descriptive, including “the name, rank, shield number, and precinct of each officer as of today and at the time of the incident” in addition to the other commonly published data points.57

Each classification of complaint is broken down into numerous subcategories; for example, rather than a broad category of “verbal abuse,” this data is divided into two sections called “discourtesy” and “offensive language.” Each category is then further broken down into subfields; for example, within “offensive language,” it indicates the subject of the discriminatory language (race, gender, ethnicity, sexual orientation, etc…), and in “discourtesy,” it indicates what kind of behavior it was (a word, an action, a curse, a gesture, etc…).58 The NYCLU has since expanded on these records with data through April 2021 that includes officer names and ranks.59

Similarly to New York City, the data available for Chicago is also far more expansive than Philadelphia’s. They publish several more data points, including officer names and the number of years they have spent on the police force.60 The Citizens Police Data Project then

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60 “COPA Cases - By Complainant or Subject | City of Chicago | Data Portal,” March 28, 2023, https://data.cityofchicago.org/Public-Safety/COPA-Cases-By-Complainant-or-Subject/vnz2-rmi.
presents this data in an even more accessible manner, underscoring the highest offenders within the police department. For example, we are able to see that out of 23,444 police officers with complaints filed against them, Jerome Finnigan is the top offender with 175 complaints, falling in the 99.8th percentile for officer allegations, the 99.9th percentile for civilian allegations, and the 64th percentile for use of force reports. In addition to personal and demographic information about him, we can also see a timeline and map of each complaint filed against him, others involved and accused alongside him, and any documents pertaining to these complaints.61

Finnigan faced disciplinary action for only two of the six cases that were sustained, despite countless repeated allegations of “illegal search” reported between 1988 and 2007.62 Although the disciplinary actions faced by Finnigan may not necessarily have been sufficient for his misconduct, openly publishing these names is nevertheless a powerful move that at the very least alerts citizens to problematic officers, and the transparency of this data far exceeds that of many other cities, including Philadelphia.

Cincinnati’s data also has numerous variables that are not reported by other cities, such as whether the complainant was visually or physically impaired, the times and dates at which the case reached every stage of the review process, and whether or not the officer was wearing a body camera, among others.63 Several other cities do have their records published, including Detroit, Indianapolis, and Milwaukee; however, their level of data collection and reporting is


62 Ibid.

much more similar in caliber to Philadelphia’s.\textsuperscript{64} \textsuperscript{65} \textsuperscript{66} Around the country, organizations like Project Comport are working to grow the number of police departments that publish complaint data in order to “provide useful, digestible accountability information to the public.”\textsuperscript{67} Other initiatives like the Police Open Data Census provide recommendations on how police departments should publish complaint data in order to maximize its accessibility.\textsuperscript{68}

While there may be a more striking difference in the presence and robustness of complaint systems between progressive and conservative areas, the way that complaints are handled does not truly depend on the political ideology of the city at hand. In other words, more progressive cities, especially those with more progressive district attorneys, do not necessarily address or publish complaints in a more effectual manner. Notably, Philly Power Research writes that “even with the election of a person people have termed a progressive prosecutor in Larry Krasner and with a new ‘change-oriented police chief’ in Philly, we have still ‘struggled to punish or remove bad actors.’”\textsuperscript{69} Moreover, low rates of justice and complainant satisfaction are

\begin{itemize}
  \item \textsuperscript{64} “DPD Citizen Complaints,” n.d., https://data.detroitmi.gov/datasets/dpd-citizen-complaints/explore.
  \item \textsuperscript{65} “IMPD COMPLAINTS,” n.d., https://data.indy.gov/datasets/impd-complaints/explore?showTable=true.
  \item \textsuperscript{68} “Police Open Data Census,” n.d., https://codeforamerica.github.io/PoliceOpenDataCensus/recommendations.html.
\end{itemize}
prevalent around the country regardless of dominant ideology, which I will elaborate upon in the section that explores the efficacy of complaint systems.

**Overview of Data and Data Manipulation**

*Cleaning Process*

Before discussing my findings from the data, it is necessary to provide some details about the data manipulation and cleaning process, as I did have to make some changes and remove some complaints from the data I analyzed. Although the 2013-2016 data and 2017-2022 data came from different sources and had a few key differences, I handled both sets in a similar manner. The earlier sets of data contain 2960 filed complaints involving a total of 4065 complainants and 7364 police officer entries, though it is important to note that this does not reflect the actual number of police officers with allegations brought against them, as I will explain further on in this section. Since the data only includes officer initials in terms of identifying information, it is hard to tell how many unique police officers had allegations brought against them. There are 427 unique sets of initials; however, different officers may share the same initials, making it difficult to parse out any further. Furthermore, for 376 officers referenced, their initials are listed as “UNK,” or unknown.

The later sets of data contain 3733 complaints involving a total of 3929 complainants and 9634 officer entries, though it is once again important to clarify that this does not reflect the actual number of police officers with allegations brought against them. As in the previous dataset, there is limited identifying information about the officers; however, since it includes
officer IDs, I was able to see that there were 3109 unique officers involved with the filed complaints in addition to 489 officers for which no ID number was listed. Given that the PPD has over 6300 police officers as of 2021, this means that around half of its officers have had at least one complaint filed against them between 2017 and 2022.70

For both periods of time, I removed the rows for which complaints occurred in a district that I did not have demographic data available for, as they would be minimally helpful to the analysis. For example, this not only included complaints for which the district occurrence was listed as unknown but for police district 77 as well, which is the PPD’s airport unit. In both cases, the complaint ID variable was only unique in the complaints data set, but not in those containing the complainant demographics and police officer demographics and disciplinary outcomes, since many complaints are associated with multiple complainants and/or officers. As such, in order to be able to merge the data, I recoded each possible “result” of the demographic and disciplinary variables for both the complainants and officers as binary variables and aggregated them to provide a numeric total for every race and sex variable within each complaint.

Where demographic information was not provided for complainants and/or police officers, I assigned the counts for each category pertaining to race and sex to appear as 0. Additionally, in cases where multiple police officers were reported, there were sometimes differing findings and consequences for each officer. As such, I also had to recode each of the “outcome” variable results as binary variables and aggregate those as well; for example, there are columns titled “noninvestigated_total” and “investigated_total” that show the number of police officers not investigated and investigated, respectively, by case and complaint ID.

Final Data Set

After cleaning both sets of data, I merged them, resulting in a full body of complaints filed between 2013 and 2022 that would be helpful for my data analysis. The final dataset utilized for my analysis consists of 6547 complaints involving a total of 7773 complainants; however, determining the number of police officers involved is less exact due to some irregularities with the data. When there are multiple entries associated with a singular complaint ID in the officer demographics and disciplinary outcomes data sets, it can be because there are multiple officers associated with a complaint, because one officer is facing multiple different allegations within one case, or a combination of both. As such, while there are a total of 16577 officer entries corresponding to this final set of complaints, this does not reflect the actual number of officers facing allegations.

A better reflection of the number of police officers associated with these complaints would be the number of unique police officers; however, once again, given the lack of identifying information, it is impossible to arrive at an exact count due to the older data in particular. Within the complaints from 2013-2016 that are included in the final dataset, there are 427 unique sets of initials, but different officers may share the same initials and this count additionally excludes officers whose initials are not listed. On the other hand, for the complaints from 2017-2022 that are included in the final dataset, looking at the unique ID numbers reveals that there were 3029 unique officers facing allegations, excluding those whose ID numbers were not listed.

Fortunately, demographic information is available for most of the 7773 complainants included in the final dataset; 5937 complainants reported their race and 6777 complainants
reported their sex, additionally revealing a stark contrast between the number of complainants who feel comfortable disclosing their race versus their sex. On the other hand, race and sex information is available for 15738 of the 16577 officer entries associated with these complaints. Given that demographic data is entirely unavailable for some complaints, it is important to acknowledge that much of the analysis based on complainant race that is conducted in the subsequent section works with a slightly narrower portion of this final dataset, using 5714 of the 6547 complaints. Furthermore, given that my demographic population data comes from 2021, when correlating race with actual population statistics, I will also be using a smaller subset of this data from 2017-2022 alone that consists of 3006 complaints.

Below is a list and description of each of the variables included in the final dataset I created:

- **complaint_id**: A six digit numeric code in the format xx-xxxx, where the first two digits are the last two digits of the year in which the complaint was filed and the remaining four digits begin at 0001 and increase in ascending order for each year.
- **date_received**: The date that the complaint was received.
- **district_new**: The police district in which the incident occurred; this includes districts 1, 2, 3, 5, 6, 7, 8, 9, 12, 14, 15, 16, 17, 18, 19, 22, 24, 25, 26, 35, 39.
- **general_cap_classification**: The classification assigned to the complaint during filing. There are fifteen categories to which complaints are assigned: civil rights violations, criminal allegations, departmental violations, domestic complaints, drugs, falsification, harassment, lack of service, non-investigatory incidents, other misconduct, physical abuse, sexual crimes/misconduct, unprofessional conduct, verbal abuse, and internal use of force.
• summary: A brief incident report of the complaint, typically a paragraph in length.

• asian_total; black_total; indian_total; latino_total; middleeastern_total; multiethnic_total; pacificislander_total; otherrace_total; white_total; racena_total: The total number of complainants of each race.

• male_total; female_total; sexna_total: The total number of complainants of each sex.

• incident_date_extract; incident_time_extract: The date and time at which the incident actually occurred, not when the complaint was filed.

• objectid: A count in ascending order of the number of complaints filed.

• po_male_total; po_female_total; po_sexna_total: The total number of police officers of each sex.

• po_asian_total; po_black_total; po_indian_total; po_latino_total; po_middleeastern_total; po_multiethnic_total; po_nativehawai_total; po_otherrace_total; po_white_total; po_racena_total: The total number of police officers of each race.

• notinvestigated_total; investigated_total: The number of officers that were investigated or not investigated in each case.

• nosustainedfindings_total; pendingfindings_total; sustainedfindings_total: The number of officers for which findings were sustained, not sustained, or pending. Complaints are classified as sustained if “an investigation reveals that one or more of the allegations filed in the complaint are supported… or departmental violations were discovered during the course of the investigation.”

“include when allegations could not be proven, allegations that did not occur or actions that occurred, but were correct, lawful and complied with departmental policies.”72

- guilty_findings; no_guilty_findings: The number of officers that were found guilty or not guilty.
- pending_disciplinary; training_counseling: The number of officers pending disciplinary action; the number of officers assigned training or counseling.
- allegations_investigated: The classification(s) of allegations found during the investigative process, which often differs from the classification the complaint was filed under; I will elaborate on this in the section entitled “Black Complainants More Likely to Report Serious Misconduct.”
- complainant_total_gender; complainant_total_race: Counts of complainant totals tallied by race and gender; used to calculate percentages of complainants by race and gender.
- po_total_gender; po_total_race: Counts of police officer totals tallied by race and gender.
- PctAsianActual; PctBlackActual; PctHispanicActual; PctWhiteActual; PovertyPctActual: Philadelphia’s 2021 race and poverty statistics by police district and the 2019 HHs: Inc Below Poverty Level (ACS 5-Yr) percentages by police district.

Findings and General Trends

Across the country, research into complaint systems against police officers has revealed several notable trends across numerous cities, to which Philadelphia is no exception. That being said, there is still relatively limited research into complaint systems and although there are examinations of other cities, the majority of relevant statistics that exist regarding these patterns

72 Ibid.
come from Chicago due to its robust and long-standing complaint system. Fortunately, Chicago happens to be a valuable point of reference for Philadelphia’s statistics; although Chicago and Philadelphia are demographically different cities, they both experience a number of similar issues, such as gentrification, high socioeconomic inequity, and relatively frequent police brutality, all of which certainly influence complaint data.\(^73\)\(^74\)\(^75\)\(^76\)\(^77\)

*Complaints Disproportionately Filed by Black Residents*

In the vast majority of cities for which complaint data is available, Black residents have been found to be disproportionately likely to file complaints, with most complaints being concentrated in predominantly Black and non-white areas; on the other hand, white residents are disproportionately less likely to file complaints, but their complaints are more likely to be taken seriously, as I will elaborate on in the final subsection of this chapter. One of the most notable examples of this is that in Chicago, Black people make up 32% of the actual population but have filed 61% of all complaints since 2011; in contrast, white people account for 50% of the

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population but only 20% of complainants.78 Similarly, in Philadelphia, Black people account for 43.6% of the population as of 2021 but 65.4% of complainants between 2013 and 2022, while white people account for 33.7% of the population but only 23.3% of complainants.79

Considering that the publicly available Chicago data from which these findings were derived spans from 1988 to 2018 and is far more extensive than Philadelphia’s publicly available data, the similarities in the results are all the more striking.80 This trend has also persisted across time and includes other non-Black racial minorities as well. Philadelphia complaint data from the 1960s shows that even at that time, non-white citizens represented 70% of all complaints filed.81 Interestingly enough, according to the current data, 76.3% of allegations filed—more specifically, 4362 out of 5714 cases—involve at least one non-white complainant, so this overall proportion has been maintained despite Philadelphia’s changing demographics across individual neighborhoods.

Research in Chicago has also shown that “complaints about misconduct were concentrated in nonwhite tracts—particularly in the predominantly black South Side,” which is

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80 “Citizens Police Data Project.”

also reflected in Philadelphia. In order to measure the volume and disproportion of allegations filed by Black complainants, I compared the percent of the population that is Black in each police district to both the raw number of complaints and the percent of complainants that were Black. Although my analysis uses police districts rather than census tracts, the trend nevertheless persists: there are significantly more complaints filed in police districts with higher Black populations, and Black complainants are overrepresented in nearly every police district. Given that this analysis works with population data from 2021, I will be using both the complete data from 2013-2022 as well as a subset of the data from 2017-2022 to highlight these trends. In the graphs below, each point represents a separate police district, with lines of best fit created using linear regression.

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82 Faber and Kalbfeld, “Complaining While Black: Racial Disparities in the Adjudication of Complaints against the Police.”
Looking at both the data from 2013-2022 (the first chart) and 2017-2022 (the second chart), there is a clear trend between the percentage of Black residents in each police district and the number of complaints filed; despite the variance, it is apparent that more complaints are filed in police districts that are more heavily Black. A significance test for the linear regression of these two variables yields a p-value of 0.02609 in the first set of data and a p-value of 0.01419 in the second set of data, indicating a high level of statistical significance.

The latter data is slightly more significant, likely because the 2021 population data is more similar and relevant to population data within the years 2017-2022 than it is to 2013-2022. While these graphs demonstrate that complaints are for the most part concentrated in heavily Black, non-white areas, they do not reveal the disproportion of Black complainants within each of these districts; however, this can be seen in the two graphs below, which correlate the percent of Black complainants against the percent of Black residents in each police district for 2013-2022 and 2017-2022 respectively.
In both of the above graphs, the black line is the 45 degree line representing what the data would look like if the percent of Black complainants and percent of Black residents were truly proportional. For both sets of data, all police districts fall above this line with the exception of
one, highlighting the pronounced overrepresentation of Black residents within the complaint data. For example, looking at the 2017-2022 data, in the most prominently Black district—district 19—Black residents account for 84.45% of the actual population and 89.5% of complainants. Conversely, in the least Black district—district 7—Black residents comprise 6.7% of the population yet 24.19% of complainants.

Furthermore, in addition to this conspicuous disproportion, the percent of Black complainants is also highly correlated—although not equally—with the percent of Black residents, as the percentage of Black complainants continues to stay above the equivalency point even as the percentage of Black residents increases. Testing the statistical significance of the linear regression between these two variables, the p-values are $7.777e-08$ and $3.086e-08$ respectively and the R-squared values are 0.7775 and 0.7979 respectively, indicating high levels of statistical significance; more specifically, a positive correlation, since the p-values were also similarly marginal in significance tests for the slope of the linear regression in particular. As was the case with the previous two sets of graphs, the latter data from 2017-2022 has slightly more significance in its correlation compared to the overall 2013-2022 data due to the usage of population data from 2021. These findings highlight that Philadelphia is no exception to the national trend of complaint incidents being concentrated within heavily Black neighborhoods, with Black complainants overrepresented in nearly every police district.

Understanding the Disproportion

A major reason for this disproportion is the overpolicing of heavily Black neighborhoods, where an increased number of police officers leads to more frequent encounters and a higher risk
of negative interactions, thereby driving up the complaints, especially since Black civilians are the most heavily affected by police misconduct. For example, one Chicago-based study examining “the racialized nature of victimhood and the ways in which neighborhood context interacts with individual characteristics” highlighted that the disparity between white and Black complainants was most prominent in predominantly Black and high-crime neighborhoods.\(^8\)

Given that the overpolicing of Black neighborhoods is an ongoing problem in Philadelphia, as it is in many other cities, much of this racial imbalance among complainants can be attributed to the higher stop rates and increased risk of victimization that Black people experience.\(^8\) Between 2015 and 2020, half of all physical abuse allegations were concentrated in six heavily Black police districts with above-average crime rates, excluding the 14th district, which saw high rates of physical abuse complaints simply due to the presence of several repeat offenders in the district, with a handful of officers having some of the highest rates of misconduct complaints at a little over three per year.\(^8\)

That being said, however, a smaller part of this disparity can be ascribed to the fact that Black complainants are more likely to utilize complaint systems and even return to them despite poor outcomes. For example, one study found that despite the fact that 83% of survey respondents did not perceive the complaint investigation process to be thorough and unbiased, 51% of Black respondents were willing to use the complaint process again if necessary, standing

\(^8\) Faber and Kalbfeld, “Complaining While Black: Racial Disparities in the Adjudication of Complaints against the Police.”


\(^8\) Briggs and Marin, “Police Misconduct in Philadelphia: Unsealed Records Name the City’s Most Cited Cops.”
in stark comparison to 32% of white respondents and 37.5% of respondents of other races. Several authors theorize that this trend occurs because complaint systems, even when not run effectively, are still one of the very few platforms available by which people can speak out against police misconduct and injustice they have experienced. Given the aforementioned barriers to litigation and the limited to nonexistent reformational success of public outcry, Black residents who wish to allege and ideally receive justice for misconduct they have experienced do not often have other meaningful options.

One author uses Albert Hirschman’s theory of exit, voice, and loyalty to further explain this overrepresentation of Black complainants, arguing that Black residents often have to turn to “voice” over “exit” given that those in predominantly Black districts often lack socioeconomic mobility and thereby the ability to simply move elsewhere. He notes that Black people “express a greater propensity to exercise voice over exit than complainants of other races/ethnicities,” which “is likely related to the availability of each option to members of the respective groups.”

Elaborating further, “as noted by Hirschman (1970), in the United States, residential mobility is a function of socioeconomic class. Those who are able to leave distressed neighborhoods generally do. However, as Hirschman (1970) indicates, blacks have not historically had the freedom to exercise exit due to discrimination and are disproportionately among the lower socioeconomic class in America. Therefore, being left primarily with only the option of voice, segments of the black community, particularly those in low-income urban areas, have embraced the militancy of voice, which Hirschman has identified as a fundamental value in the Black Power movement’s rejection of exit.”


87 Ibid.

88 Ibid.
In other words, in addition to overpolicing, Black residents are also more likely to file complaints because they feel it is one of the only ways they can speak out and be heard to at least some extent, especially since they largely also do not have the choice to exit. In essence, much of this racial disproportion can be explained by a combination of heavy overpolicing of predominantly Black neighborhoods as well as the inaccessibility and lack of alternate options besides complaint systems for Black residents who wish to air grievances against police officers.

*Black Complainants More Likely to Report Serious Misconduct*

Given that Black people are more likely to be victims of egregious police misconduct, it logically follows that Black people are also more likely to file complaints of egregious police misconduct, which is substantiated by the data. One study across eight cities in the United States found that male and non-white complainants were more likely to lodge use of force complaints, and although this paper did not include Chicago and Philadelphia, this trait is shared among them as well.\(^{89}\)\(^{90}\) A separate study of the Chicago complaint data found that the sample was disproportionately Black, at 70%, and male, at 59%.\(^91\) In Philadelphia as well, non-white men, especially Black and Latino men, comprise the majority of complaints filed against police officers. Although the majority of complaints are filed by Black men across all categories with the exception of three that are primarily comprised of Black women, the racial proportions widen

\(^{89}\) Terrill and Ingram, “Citizen Complaints Against the Police.”

\(^{90}\) Faber and Kalbfeld, “Complaining While Black: Racial Disparities in the Adjudication of Complaints against the Police.”

\(^{91}\) Ibid.
even further when it comes to more severe allegations, though that is not to minimize the potential harm caused by any incidents of alleged misconduct.

The primary reason why the majority of complaints are filed by men is because men, especially Black men, are more likely to have negative encounters with the police. That being said, however, it is important to note that there may be some selection bias given that “male citizens may be more willing to file complaints against officers for behavior that they may perceive as negative while females may not share the same viewpoint. Complaints are filed by more males even if complaints lack the necessary substance to warrant a sustained verdict. Collectively, these results indicate that more research is needed on how gender influences police complaint data, specifically examining why there may be fewer complaints reported by women, and if there is increased retaliation against women by police officers.”

Additionally, before delving into the data specific to Philadelphia, it is necessary to first clarify some information about it. Complaints are classified twice in the data, once under general_cap_classification and once under allegations_investigated. The former category is what the complaint was originally filed under, whereas the latter refers to what charges the officer was actually investigated for. There are many discrepancies between these two categories; first and foremost, the former only allows for one classification, while the latter often includes several allegations for the same complaint. Furthermore, in addition to having other classifications added on, many complaints are reclassified altogether; sometimes, this is because the complainant files their report under the incorrect or inappropriate category, while in other instances it is less clear as to why the complaint has been recategorized.

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In an email from Officer Tanya Little from PPD’s Office of Media Relations/Public Affairs to journalist Sam Learner, she wrote that “when an allegation for Physical abuse is received, that allegation is investigated, but if any other departmental infractions are revealed, then cited. So there may be a time when a Physical abuse allegation is made and the investigation determines that there is no physical abuse, but the officer didn’t complete paperwork properly, then the officer is not cited for Physical abuse, but will be cited for a departmental violation because of the paperwork error. Therefore the complaint classification and what’s actually determined through the investigation may differ.”

As such, I used the allegations_investigated column for this analysis as it provides a more comprehensive and accurate assessment of what the complaint was about. For the sake of this analysis, I will be using the categories of civil rights complaints, criminal allegations, falsification, harassment, lack of service, physical abuse, sexual crimes/misconduct, unprofessional conduct, and verbal abuse. Although domestic violence is certainly an egregious form of misconduct, looking at domestic occurrences is less relevant to the demographic analysis I hoped to conduct. Finally, I omitted the categories of departmental violations, drugs, non-investigatory incidents, other misconduct, and internal use of force due to extremely small sample sizes and/or vagueness in categorization. Additionally, this analysis only includes cases for which complainant race is available, so it is important to note that there may be some underrepresentation of racial minorities who could have potentially expressed hesitancy in reporting their race.

Across the complaint categories I focused on, lack of service, physical abuse, and verbal abuse had the highest numbers of complaints at 1438, 1051, and 1125 respectively, with a respective 1492, 1145, and 1184 complainants involved. The categories I examined and their overall counts can be seen in the chart immediately below. The subsequent chart, on the other hand, better visualizes the difference in racial proportions across categories without counting the number of complaints associated with each classification.
In line with trends seen around the country, Black complainants are much more likely to report severe allegations of misconduct compared to white complainants. Although Black complainants comprise the majority of most categories, the five types of allegations which have the highest proportion of Black complainants are civil rights complaints at 84.76%, falsification at 72.34%, physical abuse at 70.48%, harassment at 66.32%, and verbal abuse at 66.05%. On the other hand, the five types of allegations with the highest proportions of white complainants are lack of service at 31.43%, unprofessional conduct at 26.17%, sexual crimes/misconduct at 26%, harassment at 24.42%, and falsification at 23.4%.

Furthermore, some of the categories with the highest percentages of Black complainants also have the lowest percentages of white complainants; for example, only 5.3% of civil rights allegations and 16.94% of physical abuse complaints were filed by white complainants. Conversely, some of the categories with the highest percentages of white complainants also have the lowest percentages of Black complainants; in contrast to the high percentages of Black complainants when it comes to serious allegations, only 55.63% of lack of service cases and 62.82% of unprofessional conduct cases were filed by Black complainants. Even though Black complainants account for the majority of complainants regardless of category, it is still clear to see that the disparity between Black and white complainants further diverges when it comes to more egregious forms of misconduct and narrows in cases of milder allegations.

As demonstrated in the chart below, Philadelphia’s data also falls in line with the overall trend that most complainants are men. As such, combining these race and gender statistics reveals that most of Philadelphia’s complainants are Black men, which also aligns with nationwide patterns regarding complainant demographics. While Black men account for the
The majority of complainants alleging civil rights violations, criminal allegations, falsification, harassment, physical abuse, and verbal abuse, Black women account for the majority of complainants alleging lack of service, sexual crimes/misconduct, and unprofessional conduct. Although there is no concrete explanation as to why Black women file more complaints regarding lack of service or unprofessional conduct, it is much less surprising that Black women comprise the majority of sexual crime/misconduct allegations given that women in general—and especially Black women—are more likely to be victims of sexual crimes, particularly at the hands of police officers. As such, this complaint data also mirrors misconduct statistics which reveal that “Black women are disproportionately carrying the brunt of police sexual violence against women.”

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On the whole, Philadelphia’s complaint data reveals that it shares in the trend of most complainants being Black—particularly Black men—with Black complainants reporting serious allegations of misconduct at disproportionately high rates compared to white complainants.

*Black Complainants Less Likely to be Taken Seriously — but not always in Philadelphia*

In most cities with the unique exception of Philadelphia, complaints lodged by Black residents were less likely to be sustained by the review boards that adjudicate each incident in comparison to white residents and residents of other races.\(^8\)\(^9\) For example, in Chicago, only 1.9% of complaints made by Black residents were sustained in contrast to 19.7% for white residents.\(^8\)\(^9\)

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\(^8\) Terrill and Ingram, “Citizen Complaints Against the Police.”

residents.\textsuperscript{100} In Philadelphia, however, the numbers are surprisingly equal; 22.8% of complaints involving at least one Black resident were sustained and 22.4% of complaints involving at least one white resident were sustained. Furthermore, while many other cities see a racial disparity in whose complaints are investigated to begin with, the numbers are again the same in Philadelphia; 93.7% of cases involving at least one Black complainant were investigated in comparison to 93.5% of cases involving at least one white complainant. That being said, however, it is important to once again note the drastic difference in the number of complaints made by each race: 3727 cases had at least one Black complainant involved while only 1339 cases had at least one white complainant involved.

While a comparative lack of racial discrimination in the adjudication of complaints is certainly positive, it is important to clarify that very few cases and allegations are sustained on the whole. Although Philadelphia has a comparatively high overall investigation rate at 93.3%, only 23.4% of allegations are sustained, with even fewer officers actually being found guilty and receiving disciplinary action, a mere 1.8% and 5.8% respectively. This trend persists across all cities, where a marginal number of complaints are sustained to begin with, and an even smaller fraction of officers actually face disciplinary action; in Chicago, this number is a mere 6.8% of the officers involved in nearly 250,000 allegations.\textsuperscript{101}

In Philadelphia, this bleakness in adjudication is shared almost equally across races: 1.6% of cases involving at least one Black complainant and 2.5% of cases involving at least one white complainant resulted in guilty findings. This is substantiated by a 2020 study conducted on Philadelphia’s data from 2013-2020, which found that guilty findings only increased from 2% to

\textsuperscript{100} Ibid.

\textsuperscript{101} “Citizens Police Data Project.”
3% in complaints made by white civilians.\textsuperscript{102} That being said, guilty findings aside, another study of the Philadelphia data from 2013-2020 found that “the Internal Affairs Bureau was 21% more likely to recommend disciplinary action when a white person filed a complaint.”\textsuperscript{103}

Even so, Philadelphia’s overall rate of sustention still surpasses both city-specific and national statistics; for example, an older Bureau of Justice Statistics Special Report from 2006—based on 2002 use of force allegations against state and local law enforcement officers—found that only 8% of allegations were sustained.\textsuperscript{104} Additionally, other studies show that in police departments across the country, most rates of sustention fall below 12%.\textsuperscript{105}

Although Philadelphia does deviate from the norm in terms of its apparent lack of racial bias in adjudication, the data is still quite similar to even older bodies of research regarding complaint systems against the police. For example, a 1982 study now republished by the U.S. Department of Justice Office of Justice Programs had three major findings that closely align with what can be witnessed in the Philadelphia data: “Black people were disproportionately represented among complainants,” “regardless of race, an insignificant number of citizens had their allegations supported,” and finally, that “Blacks arrested were much more likely to file complaints than were their white counterparts, regardless of the arresting officer’s race. Overall,

\textsuperscript{102} Learner, “How Officer Complaints Are Investigated: A Case Study of Philadelphia Police.”

\textsuperscript{103} Briggs and Marin, “Police Misconduct in Philadelphia: Unsealed Records Name the City’s Most Cited Cops.”


\textsuperscript{105} Faber and Kalbfeld, “Complaining While Black: Racial Disparities in the Adjudication of Complaints against the Police.”
blacks were more likely to have had negative encounters with police, supporting the contention in the literature that evaluations of the police vary by race because of different experiences.”

The study further elaborates that “since it could not be determined how many valid complaints were not filed or how many of those filed were not valid, the issue of discrimination could not be fully and accurately assessed, but the preponderance of evidence makes it difficult to discount race as a factor in how complainants were handled by the police.” Although these findings come from a city of 500,000 people, which is significantly lower than the population of either Philadelphia or Chicago, it is still interesting to see these persisting trends across decades, population sizes, and regions of the country.

This final point is especially important to consider in Philadelphia, where although there may be no apparent racial disparity in the data in terms of how complaints are adjudicated, it is difficult to determine if there is racial discrimination in terms of the outcomes’ true validity. Additionally, given that Black residents are far more likely to report egregious allegations of misconduct compared to white residents—as detailed in the previous section—it is rather surprising to see the same rates of investigation, sustention, and disciplinary action across the board.

There is also a strong sense of perceived racism in the adjudication process of complaints. One study quotes a Black participant as saying “‘If you are a 19 or 20 year old minority male and you file a complaint, there would be nothing done. It would be a waste of your time to pursue it.’” This attitude is also shared by members of other minority groups as well, who

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107 Ibid.
on the whole expressed great cynicism with the complaint process, and in some cases a fear of retaliation as well. Although this study does not include complainants from Philadelphia, given the high rates of tension between Black residents and police officers, it is likely that complainants here largely feel the same way. Even though Philadelphia in some cases appears to be an exception to the trend of devaluing Black complainants, it is nevertheless a notable and persistent trend across the rest of the country, and many Black complainants often feel as though they are not being taken seriously regardless.

**The Efficacy of Complaint Systems**

To study the efficacy of complaint systems, it is important to first identify the goals of such complaint procedures, which are to “(a) provid[e] a thorough review of citizen complaints against police, (b) sustain[] complaints that are supported by the evidence and recommend[] appropriate discipline for guilty officers, (c) deter[] future police misconduct, (d) provid[e] satisfaction to individual complainants, (e) enhancing the public perception of the police department, and (f) enhancing the efficiency and professionalism of the police department.”

While it is not possible to fully assess this second goal—namely, the validity of complaint outcomes—as a third party, there is evidence to show that even when found guilty, officers are not appropriately disciplined. Furthermore, existing research and literature regarding complaint systems combined with city-specific data overwhelmingly demonstrate that complaint systems rarely achieve these other goals successfully, as I will expand upon below.

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109 Ibid.
Justice and Satisfaction for Individuals

Given the limited consequences of these complaints, it is no surprise that most complainants come away from the process dissatisfied and without a sense of justice. One study found that “people who file complaints against the police tend to experience objectively unfavorable outcomes, for most complaints are not sustained… complainants’ subjective experiences are shaped mainly by outcomes, while features of the process that might be expected to enhance its procedural fairness have little or no effect on complainants’ judgements.”\textsuperscript{110}

This lack of faith brought about by poor outcomes seems to be a common trend across time; when Philadelphia’s first civilian review board was created in 1957, there was little credibility even then because most complaints remained unsustained.\textsuperscript{111} Although there is no way of evaluating if these cases were actually reviewed thoroughly and the extent to which their conclusions are unbiased and sound, given widespread discontent with the complaint process and its outcomes, there still seems to be an issue at hand with the way complaints are adjudicated.

Even though Philadelphia has a comparatively high sustention rate as previously noted, the outcomes are still largely poor, and very little accountability actually arises from the complaint process. One study of Philadelphia complaint data between 2015 and 2020 found that “almost 75% of the sustained complaints were not even heard by the Police Board of Inquiry to


evaluate guilt - instead involved officers just received training and counseling.”

In a 2021 report, PAC wrote that they “believe[] that although training and counseling can be a useful tool, it has been overused as a way to resolve cases.”

Additionally, during this time period, only 2% of officers were found guilty; furthermore, the disciplinary consequences were always minimal, with “only 0.5% resulting in at least a one day suspension, and the most severe discipline [being] just a 30 day suspension.”

Considering that some of these complaints describe cruel acts of physical and sexual violence, it calls into question the seriousness of this process, especially when it comes to penalizing officers.

The Fraternal Order of the Police union also stands in the way of justice for complainants given its ability to appeal guilty findings and allow officers to be rehired. In the Philadelphia Inquirer’s analysis of 170 cases of police arbitration from 2011-2019, they “found that police had their discipline overturned or reduced through arbitration a striking 70% of the time.” In other words, even out of the already marginal number of officers who are found guilty and assigned disciplinary consequences, only 30% must actually follow through with these consequences in the end. As noted before, only 1.8% of officers were found guilty in the data I

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112 “Philadelphia Police: A History of Brutality.”

113 Police Advisory Commission, “Collaborative Review and Reform of the PPD Police Board of Inquiry.”

114 “Philadelphia Police: A History of Brutality.”

115 Ibid.

worked with, meaning that only approximately 0.54% of officers with allegations against them were actually disciplined.

In police departments across the country, on the rare occasion that police officers are fired for serious misconduct, they are often rehired by other departments instead, rendering these repercussions essentially futile.\(^{117}\) For example, the largest study of police hiring found that rehired officers make up 3% of the police force in Florida, “present[ing] a serious threat to communities because of their propensity to re-offend, if they had engaged in misconduct before.”\(^ {118}\) Additionally, these officers were then also “more likely … to be fired from their next job or to receive a complaint for a ‘moral character violation.’”\(^ {119}\)

Moreover, complaints are often dismissed or minimized in order to protect police officers. When six PPD officers were charged with domestic violence in the same year, most of their appeals to get their jobs back were successful because they had been “deliberately only charged with disorderly conduct rather than domestic violence, so they [would be] allowed to come back to work.”\(^ {120}\) When another officer was found guilty of burglary, trespassing, and theft, the arbitrator argued that the officer simply “needs to behave better”; despite the overwhelming


\(^{120}\) “Philadelphia Police: A History of Brutality.”
evidence, dismissal was deemed to be “too extreme,” so the officer was only assigned anger management classes and even had his record expunged.121

Furthermore, many complainants are disappointed by the opaqueness of the complaint process itself. One study of complainant satisfaction found that 70% of participants did not feel adequately informed during the complaint process, and 72% of participants felt that the outcomes of their complaints were not sufficiently explained. Moreover, respondents expressed high levels of skepticism in the thoroughness and objectivity of the review process even before receiving their outcome.122 In summary, as explained by one researcher, “many law enforcement agencies not only fail to adequately investigate misconduct allegations [and] rarely sustain citizen complaints, but disciplinary sanctions are few and reserved for the most egregious cases.”123 Given these bleak outcomes, it appears that complaint systems—both in Philadelphia and elsewhere—are largely ineffective in providing a sense of justice for complainants or recourse for any misconduct they may have experienced.

Institutional Change

On a larger scale, complaint systems also appear to do very little to spur major institutional reform, particularly in terms of improving the overall state of racial disparities and discrimination in policing. That is not to say that these formal complaint systems and the data collection that accompanies them are entirely futile; however, it is more so that police

121 Ibid.


123 McCorkel, “Police Officers Accused of Brutal Violence Often Have a History of Complaints by Citizens.”
departments do not take advantage of this data in order to create meaningful change despite the numerous possibilities it affords. Although having an effective formal complaint process is by no means “a cure for police brutality,” if police departments were to make use of the breadth of complaint data at their disposal, it could be utilized meaningfully to hold more police officers accountable, thereby keeping more citizens safe from police misconduct and creating some level of progress—even if only marginal—in improving systemic racism within policing.\footnote{Liqun Cao and Boyen Huang, “Determinants of Citizen Complaints against Police Abuse of Power,” \textit{Journal of Criminal Justice} 28, no. 3 (May 1, 2000): 203–13, https://doi.org/10.1016/s0047-2352(00)00036-2.}

That being said, the issue once again seems to lie with the fact that many police departments, including Philadelphia’s, are not actually focused on police accountability, as is evidenced by incidents such as the reclassification of domestic violence complaints to allow officers back onto the force. Even so, there is an array of literature showcasing how complaint data can be taken advantage of for various constructive purposes with the ultimate goal of reducing police misconduct.

For example, one Philadelphia-based study used GIS to map out the complaint incidents from 1998 to 2000 on a much more location-specific level than police districts alone, highlighting the significant value of this data: by identifying complaint “hot spots” and using location data in conjunction with demographic data to develop explanations and responses for these proliferations, police analysts could then institute targeted plans to improve their relationship with residents of that district.\footnote{Brian A. Lawton et al., “Using GIS to Analyze Complaints against Police: A Research Note,” \textit{Justice Research and Policy} 3, no. 2 (December 1, 2001): 95–108, https://doi.org/10.3818/jrp.3.2.2001.95.} In other words, tracking these “hot spots” might afford police departments the opportunity to improve community relations by reducing
overpolicing and rebuilding trust in these respective neighborhoods, particularly within heavily Black communities.

Another study found that the employment of body-worn cameras helped to mitigate complaints against police and improve community relations; on average, having police officers wear body cameras reduced complaint incidence by 93%, mimicking findings from an earlier experiment conducted in 2015. The researchers attribute these findings to the observer effect and the idea of “contagious accountability,” whereby transparency leads to accountability.

The authors explain the implications of this research as follows: “Formal grievances are often viewed as a mirror of police (mis)conduct, with more complaints lodged against officers interpreted as reflective of a police agency that is less compliant with police procedure, or with expected conduct, and the proper code of practice. Thus, reducing complaints is a welcomed outcome, particularly when it is accompanied by improving public confidence and legitimacy or accountability and transparency. It also makes sense economically, as claims resulting from grievances, particularly those that are accepted by the court, could cost police departments millions of dollars that they do not have.”

More notably, given that police officers who commit acts of brutal violence and severe misconduct usually have an extensive list of complaints filed against them, analyzing these complaints can be essential in determining the risk posed by individual officers. For example, Derek Chauvin, the former police officer who was charged with third-degree murder and second-degree manslaughter for killing George Floyd, previously had 18 misconduct complaints filed against him and was additionally involved in two more shooting incidents.


127 Ariel et al., “‘Contagious Accountability.’”

128 McCorkel, “Police Officers Accused of Brutal Violence Often Have a History of Complaints by Citizens.”
Police departments can and should be using complaint data in a precautionary manner in order to identify high-risk officers; however, given the minimization of complaints and lack of accountability in the adjudication process, these complaints are rarely taken seriously as an early warning system for future misconduct, despite these obvious and well-evidenced patterns. In 2022, for example, of the 307 officers who fatally shot someone that could be identified, at least 22 had shot or killed someone before, and 8 had multiple prior shootings.\(^{129}\)

There are countless such examples within Philadelphia itself; one notable example is Philadelphia police officer Sharrod Davis, who killed a veteran named Angelo Slaughter and whose record since then has continued to be littered with dozens of allegations of misconduct, including theft, abuse, off-duty altercations, and two other prominent shootings, one of which nearly ended fatally. He was also one of sixteen officers as of 2020 to receive more than ten complaints over five years, with the group as a whole accounting for 188 filed complaints. Time and time again, however, he was not held accountable; during his 17-year career, internal investigators sided with him in over 27 disciplinary proceedings.\(^{130}\)

If police departments used these complaints as risk indicators and appropriately disciplined, suspended, or altogether expelled non-compliant officers in accordance with the severity of their misconduct, they could significantly reduce negative interactions with civilians and perhaps even save lives. Data from New York City’s police department, for example, revealed that officers who repeatedly faced complaints and had negative marks in their files were

\(^{129}\) “2022 Police Violence Report.”

\(^{130}\) Briggs and Marin, “Police Misconduct in Philadelphia: Unsealed Records Name the City’s Most Cited Cops.”
over three times more likely to fire their gun. One Chicago-based study used CPD data and a policy simulation to estimate that removing the top 10% of officers with complaints filed against them and replacing them with officers who have a more moderate risk distribution would lead to a 4-6% reduction in “use of force” incidents over 10 years.

Although the paper dismisses this effect as negligible—contrary to my personal opinion—it is important to note that this is only a simulation and that the results may also have been more notable if all officers with anything greater than a low to moderate risk distribution were removed, as would be the case ideally. When it comes to use of force, which can always result in fatality, even a 4-6% reduction could be enough to lessen the lives lost to police brutality. Moreover, another study from Chicago demonstrates that police misconduct is contagious, especially when it comes to wrongful shootings, finding that “although only a small percentage of officers shoot at civilians, those who have done so often serve as ‘brokers’ in the social networks within policing. Other officers connected to them were also found to be at greater risk of shooting.” As such, firing officers who have repeatedly faced use of force charges would additionally lessen the risk of officers around them engaging in such improper behavior.

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Furthermore, despite the previous authors’ conclusion about the limited extent of impact on citizen complaints, they still argue that complaint data should be used as an early warning system “to deter problematic behavior and promote accountability” given that when warning systems are “coupled with rigorous oversight and genuine accountability, [they] have the potential to have a far larger effect by generating deterrence or spillover effects or by holistically changing departmental culture.” Additional, as a counterpoint to the lack of impact found in this study’s predictive model, yet another Chicago-based study that used civilian allegations to predict police misconduct discovered that “the worst 1 percent of officers, as measured by civilian allegations, generate almost 5 times the number of payouts and over 4 times the total damage payouts in civil rights litigation. These findings suggest that intervention efforts could be fruitfully concentrated among a relatively small group.”

In some cases, the lack of accountability and change stemming from this complaint data is due to failures in properly informing commanders of serious officer misconduct complaints. In Philadelphia, for example, “a 2015 memo obtained by WHYY News/Billy Penn — from former 1st District Captain Lou Campione, recently reassigned after Columbus statue protests — expresses frustration that he was not alerted to a sudden rise in civilian complaints in his district. ‘Our [complaints against police] were up 33% for the year and the captain was notified of only one,’ reads the memo, which was signed by Campione. ‘This is unacceptable.’” A PPD

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135 Chalfin and Kaplan, “How Many Complaints against Police Officers Can Be Abated by Incapacitating a Few ‘Bad Apples?’”

spokesperson noted that captains are supposed to receive weekly briefings regarding complaints filed against their officers; however, they did not comment on this memo specifically.137

Using filed complaints as a predictive measure could be especially valuable in Philadelphia, where individual officers draw in far more complaints compared to other cities. In Boston’s police force, the highest offenders receive around one complaint per year; in contrast, in 2020, over 56 Philadelphia police officers received one complaint, with the greatest offenders receiving three or more complaints per year.138 Moreover, between 2015 and 2020, only 260 of the some 6500 PPD officers accounted for almost a quarter of all complaints filed.139 While complaint systems alone are not nearly enough to spark institutional reform, if the data were to be utilized properly, they could act as a meaningful way by which to evaluate police practices and make necessary adjustments; however, most police departments do not seem particularly interested in pursuing such a task.

Conclusion and Future Research

Philadelphia’s complaint data and the insights we are able to gain from it largely align with and substantiate patterns across the country. Most significantly, an extremely limited number of officers are found guilty and actually face consequences, mirroring the low rates of guilty findings and disciplinary action seen in dozens of other cities. Moreover, in terms of racial trends, Black residents are heavily overrepresented, with a disproportionate number of

137 Briggs and Marin, “Police Misconduct in Philadelphia: Unsealed Records Name the City’s Most Cited Cops.”

138 Ibid.

139 Ibid.
complaints being filed by Black civilians and with more complaints being concentrated in heavily Black neighborhoods. Additionally, most complaints tend to be filed by Black men; however, Black men and women are both more likely to file serious charges of misconduct, especially when compared to white complainants.

Given that complaint systems appear to provide little to no value on both an individual and institutional scale, it begs the question of what, if any, purpose they serve. Beyond providing citizens with the illusion of a chance to express their dissatisfaction and achieve justice, Philadelphia’s complaint system and other complaint systems seem to operate as essentially a band-aid on a bullet wound, allowing people to air their grievances without substantive outcomes in either holding individual police officers accountable or reducing misconduct on the whole. Additionally, transparency in the complaint process and data—while certainly encouraged and valuable for research and public accountability purposes—does not actually serve to improve outcomes or the efficacy of these systems in a substantive way. Furthermore, given the racial patterns exhibited across the data both in Philadelphia and elsewhere, it is clear that the failures of these complaint systems are primarily doing a disservice to Black residents, Black men in particular.

Further research into complaint systems should explore what can be actually done, if anything, to improve the efficacy of these systems. One of the most common suggestions is the use of civilian review boards, which have sometimes been shown to uphold more excessive force complaints than internal review committees.140 That being said, other research has found the contrary; one study concluded that the “institution of a citizen review board had little effect on

140 McCorkel, “Police Officers Accused of Brutal Violence Often Have a History of Complaints by Citizens.”
complainant satisfaction as the change did not substantively alter the review process or outcomes.”

Yet another study found that “‘little empirical evidence has been produced about the extent to which citizen review meets these expectations… the popularity of citizen review and optimism about its benefits far outstrip the empirical evidence that citizen review has salutary effects.’” In other words, although the presence of a civilian review board can certainly provide value depending on its reach—especially in terms of providing complainants with a more independent and unbiased arbitrator—there is limited evidence that doing so actually increases the efficacy of the complaint system as a whole by improving complainant satisfaction.

Additionally, many civilian review boards fail due to a lack of resources—like Philadelphia’s—or due to lawsuits and harassment from police unions. Newark’s complaint system has been one of the most successful implementations of a civilian review board due to the fact that they are the only civilian board to have the final say on disciplinary measures; however, they are subjected to even greater police backlash as a result. Police union backlash is also part of the reason why Philadelphia’s civilian review boards have never endured; as explained by one organization, “In Philly, our local police union is notoriously resistant to reforms that curtail their power in any way or that impose non-police led oversight.”

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141 Faber and Kalbfeld, “Complaining While Black: Racial Disparities in the Adjudication of Complaints against the Police.”


144 “Philadelphia Police: A History of Brutality.”
the country, it will be always be difficult to overcome union pressures in order to make the changes necessary to improve the efficacy of complaint systems.

Another such possibility is by way of somehow incentivizing police departments to adjudicate cases more thoroughly and transparently, hold officers accountable and enforce appropriate disciplinary action instead of protecting them, and use complaint data to make improvements and reduce police misconduct, especially that which occurs along racially biased lines. Although this may seem like an impossible endeavor, it should nevertheless be attempted. For example, “a study published in the American Economic Journal reviewed 50,000 allegations of officer misconduct in Chicago and found that officers with extensive complaint histories were disproportionately more likely to be named subjects in civil rights lawsuits with extensive claims and large settlement payouts”; if police departments and unions resist change on the basis of reducing police misconduct alone, highlighting the financial incentives may be more compelling.145

Given that Philadelphia falls in the 24th percentile across cities with a population of at least 250,000 for police budget cost per person—0% being the worst and 100% being the best—and the 25th percentile for misconduct settlements, such evidence could potentially be a source of motivation if PPD hopes to cut its costs.146 Perhaps reframing the value of the data that complaint systems afford as a means by which to save money would encourage police departments to actually discipline or remove officers with complaint histories that predicate future risk.

145 McCorkel, “Police Officers Accused of Brutal Violence Often Have a History of Complaints by Citizens.”

146 “Police Scorecard: Philadelphia, PA.”
Subsequent research into complaint systems should move away from descriptive statistics and analyses in favor of practical recommendations that could help police departments adopt the changes necessary to use complaint systems in a more meaningful way. As demonstrated by the literature, complaint systems do in fact afford a wide range of possibilities in terms of reducing police misconduct and racial discrimination in policing; however, most of this is untapped potential. At the moment, flaws in the complaint adjudication process combined with police departments’ failure to take advantage of complaint data render these systems largely ineffectual, both in Philadelphia and beyond. Given the countless bleak statistics regarding police misconduct and racially biased policing, it is overwhelmingly apparent that change is desperately needed.
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