



**NEW YORK CITY COUNCIL
JOINT HEARING BY THE COMMITTEE ON OVERSIGHT AND INVESTIGATIONS AND
THE COMMITTEE ON CRIMINAL JUSTICE**

**TESTIMONY OF CHRISTOPHER RYAN
ACTING COMMISSIONER, NEW YORK CITY DEPARTMENT OF INVESTIGATION**

**EXAMINING DOI'S REPORTS ON SANCTUARY CITY LAW COMPLIANCE
BY THE CITY DEPARTMENT OF CORRECTION AND NEW YORK CITY POLICE DEPARTMENT**

THURSDAY, MARCH 5, 2026

Testimony of Acting DOI Commissioner Christopher Ryan on DOI Reports Re: Sanctuary City Law Compliance
Thursday, March 5, 2026

Good morning, Chair Krishnan and the Committee on Oversight and Investigations and Chair Brooks-Powers and the Committee on Criminal Justice. My name is Christopher Ryan, and I am the Acting Commissioner of the Department of Investigation (DOI).

I appreciate the opportunity to provide testimony on the two reports DOI issued in 2025 regarding the City Department of Correction's (DOC) and the New York City Police Department's (NYPD) compliance with the Sanctuary City Laws, the local laws that limit how and when City officials can assist with the enforcement of aspects of federal immigration law. These laws and related City policies restrict local authorities' ability to share information about an individual's immigration status, bar City law enforcement from honoring ICE detainers unless specified conditions are met and prohibit City agencies from assisting with immigration enforcement. It is important to note that following DOI's reports in 2025, the City's Sanctuary Laws and policies were updated earlier this year through Local Law 63, which broadened some key definitions such as "federal immigration authorities," and "immigration enforcement," and barred federal immigration authorities from maintaining offices on Rikers for any purposes, and through Mayoral Executive Order (EO) 13, which prohibited the use of City lots as staging grounds for non-local law enforcement operations, among other changes.

DOI's investigation resulted in two public reports focused on specific allegations involving DOC and the NYPD and presented New Yorkers with our findings and the details of the violations that DOI substantiated. These reports also explained the importance of the recommendations we issued to strengthen agency policies and training around these laws, which were passed to encourage undocumented immigrants to report crimes, seek medical help, and access other essential services without fear of deportation.

DOI's investigation relating to the NYPD began in response to a letter from then-Speaker Adams and then-Chair of the Oversight and Investigations Committee Brewer on June 9, 2025, which raised questions about potential violations of the Sanctuary City laws in two incidents. DOI reviewed these two incidents and found a third incident during a review of media stories raising similar fact patterns to the initial two. The NYPD alerted DOI to a fourth incident, and a fifth incident was uncovered during DOI's investigations. Collectively, these incidents provided a diverse survey of how the City's Sanctuary City laws are implicated in the NYPD's work.

The DOC investigation began as a result of a February 2025 complaint to DOI. The results of DOI's limited review of officer conduct and the broader findings of the investigation determined that one DOC task force member assisted with immigration enforcement but was not aware that the information provided to federal authorities was in furtherance of civil immigration enforcement and thus impermissible. DOI also found that DOC was not training personnel on how to engage with immigration enforcement officials or issuing sufficient guidance about the City's Sanctuary City Laws.

For both reports, DOI conducted focused investigations and issued recommendations to the NYPD and DOC so those agencies could take any necessary corrective actions and implement any needed measures to ensure compliance with Sanctuary City Laws that would prevent future violations. DOI also recommended that DOC and the NYPD conduct internal audits of their interactions with federal immigration authorities.

I believe the findings of our reports lay the groundwork for the audit efforts announced in EO 13, titled "Protecting New Yorkers from Abusive Immigration Enforcement," which, among other provisions, requires six City agencies to develop and publicly communicate policies and protocols regarding their interactions with immigration enforcement authorities on their websites and to implement training for their employees, contractors and subcontractors. These agencies—specifically, the Administration for Children's Services, DOC, the Department of Health and Mental Hygiene, the Department of Probation, the Department of Social Services and the NYPD—are also directed to conduct compliance audits of relevant Sanctuary Laws and to produce a report on their findings. In addition, the EO supports employee and public education efforts on the laws and regulations surrounding the City's interaction involving immigration enforcement, an important element raised in our reports. If the audits uncover wrongdoing or allegations that Sanctuary Laws and/or policies have been violated, they should be referred to DOI for further investigation.

Let me turn to the findings of DOI's reports.

September 2025: DOI Investigation into DOC Intelligence Bureau Investigator Assisting Federal Agents with Immigration Enforcement

In September 2025, DOI issued its report on an investigation into a DOC Intelligence Bureau Investigator assisting federal agents with immigration enforcement that was prompted by a complaint to DOI. The complaint to DOI alleged that DOC officers assigned to a joint task force provided assistance to Immigration and Customs Enforcement (ICE) agents in February 2025 in connection with the arrest of an individual in DOC custody who was believed to have entered the country illegally. It is important to note that except in very limited circumstances, DOC staff cannot consent to a request from a non-local law enforcement agency for assistance or support to further civil immigration enforcement or to provide assistance or support. However, it is permissible for DOC staff to participate in task forces with other goals, such as bringing charges, even if that work has potential impact on an individual's immigration status.

DOI's investigation found that a DOC investigator assigned to the Homeland Security Investigations (HSI) Violent Gang Task Force did in fact provide assistance, in violation of City law and DOC policy. During the investigation, DOI uncovered a second incident where the same DOC investigator provided information to federal immigration authorities about a second person in DOC custody, also in violation of City law and DOC policy. In both instances, DOI determined that the DOC investigator was not aware that the information provided to federal authorities was in furtherance of civil immigration enforcement rendering the DOC officer's actions impermissible, as opposed to the inquiry actually being in furtherance of a federal criminal investigation, which would have been permitted pursuant to local law and DOC policy.

DOI also found that DOC had not provided sufficient guidance or training to DOC personnel with respect to DOC's rules and procedures for interacting with law enforcement agencies involved in immigration enforcement. DOC was also not providing any training to its officers or staff about City Sanctuary City laws or DOC's policies issued pursuant to those laws. Moreover, the requests for immigration enforcement assistance relating to the two persons in custody were not reported to the Mayor's Office of Immigrant Affairs or posted to DOC's website, as required by law.

DOI issued seven recommendations to DOC to strengthen their practices, including:

- Providing updated guidance to DOC employees on the City's Administrative Law relating to immigration enforcement and on how to respond to requests from law enforcement partners;
- Instructing DOC staff to direct any immigration-related requests from other law enforcement authorities to DOC's ICE Unit and the General Counsel's Office;
- Conducting a department-wide audit to determine any other identifiable instances where DOC, unintentionally or otherwise, assisted in immigration enforcement; and
- In accordance with NYC Administration Code, reporting any previously unknown or unreported immigration enforcement-related requests to the Mayor's Office of Immigrant Affairs.

DOC accepted four of the recommendations, implementing two of them; partially accepted two recommendations; and is still considering one recommendation. DOI will continue working with DOC to ensure implementation of the recommendations that DOC is accepting.

December 2025: DOI Investigation into the NYPD's Compliance with Local Laws Restricting City Assistance with Immigration Enforcement

In December 2025, DOI issued its report into the NYPD's compliance with local laws restricting City assistance with immigration enforcement. DOI examined five incidents and identified one instance where an NYPD officer violated local law by providing assistance to federal authorities in connection with enforcement of the federal civil immigration law, found that the NYPD does not fully comply with documentation and reporting requirements set forth in the Sanctuary City Laws, and also found gaps in the NYPD's current policies and practices that increase the risk of improper assistance to federal authorities for purposes of civil immigration enforcement.

Broadly, DOI found that the NYPD has been working diligently to ensure that its policies comply with local laws, while still permitting critical partnerships with federal law enforcement on criminal investigations. DOI concluded that the NYPD's current policies and procedures, particularly as strengthened and enhanced by a series of policy reforms that the NYPD implemented in 2025, both before and after DOI began its investigation, comply with City law.

As a result of the investigation, DOI issued seven recommendations to improve the NYPD policies and practices, which the NYPD agreed to implement. We appreciate that the Council has shown its commitment to the same goals embodied in our recommendations in its recent enactments, as well—for example, by requiring that the NYPD scrutinize requests for custodial transfers from all federal agents who could be enforcing immigration laws, not just immigration authorities. The NYPD recently reported that they are moving forward with their effort to implement our recommendations:

- On the recommendations that call for NYPD to require enhanced review of all custody transfers to federal agents, to adopt a standalone policy on requests for custodial transfers, to improve policies for processing requests for assistance from federal agents, and to adopt guidelines to implement Local Law 246, which restricts non-local law enforcement officers from the City property under its control – NYPD has established a working group that is in the process of drafting new policies.
- On the recommendation that the NYPD provide further training to its officers and employees on how to comply with Sanctuary City Laws, the NYPD is currently discussing the correct structure for its supplementary training.
- And finally, to better understand the NYPD's compliance with local laws, DOI recommended that the NYPD conduct an email audit of NYPD members assigned to federal task forces to ensure their compliance with local law. The NYPD has reported that the audit, and a proper structure for that audit, is under active discussion.

Our reports provided much needed transparency on incidents of concern involving two City agencies' compliance with Sanctuary City Laws and offered numerous suggestions as to how compliance could be improved moving forward.

Thank you and I am happy to answer any questions.