PASADENA POLICE DEPARTMENT

GENE HARRIS
CHIEF OF POLICE



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MEMORANDUM

November 16, 2026

TO: Honorable Mayor and City Council

FROM: Eugene Harris, Chief of Police

SUBJECT: **PROVIDE POLICY DIRECTION ON THE PASADENA POLICE DEPARTMENT AUTOMATED LICENSE PLATE READER (ALPR) PROGRAM THROUGH 2028**

Since the posting of the meeting materials, the Police Department has gathered additional information for this item to assist with City Council's consideration of the Automated License Plate Reader Program.

CITY OF PASADENA
POLICE DEPARTMENT

AUTOMATED LICENSE PLATE READER PROGRAM REVIEW OF AGREEMENTS, OPERATIONS, DATA SHARING, PRIVACY SAFEGUARDS, AND PUBLIC SAFETY IMPACT

BACKGROUND

The Pasadena Police Department (PPD) has utilized Flock Safety ALPR technology since 2023 as an investigative and public safety tool. PPD currently operates 61 fixed-position Flock ALPR cameras throughout Pasadena. The cameras detect license plates and objective vehicle characteristics. They do not utilize facial recognition technology or identify vehicle occupants. Pasadena currently maintains a 30-day retention period for routine ALPR data.

ALPR technology provides two primary capabilities. First, vehicles associated with stolen vehicle databases, wanted persons, missing persons, or other authorized law enforcement purposes may generate real-time alerts when detected. Second, authorized personnel may conduct investigative searches of historical ALPR information to determine whether and where a vehicle was detected during the applicable retention period. This information may assist detectives in developing leads, identifying suspect vehicles, and establishing possible routes of travel.

Considering national and statewide concerns regarding ALPR access and sharing, PPD reviewed its ALPR program, agreements, data practices, audit records, sharing controls, legal framework, operational value, and fiscal implications.

REVIEW PROCESS

- Review of the City's existing and proposed agreements and related documents with Flock Safety;
- Review of data ownership, retention, user access, system security, and contractual safeguards;
- Review of PPD's monthly audit practices, the comprehensive 2025 network audit, Flock's Audit Assist functionality, and independent review by Pasadena's Independent Police Auditor (IPA);
- Evaluation of interagency data sharing and PPD's ability to modify or discontinue individual sharing relationships;
- Review of recent Flock platform changes affecting California law enforcement agencies;
- Review of applicable California legal requirements and the distinction between voluntary sharing and disclosure compelled through valid legal process;
- Review of current Policy 462 and the Department's draft modernization of that policy, which remains subject to legal and Department staff review and approval;
- Review of PPD ALPR utilization, case examples, stolen vehicle recoveries, and investigative outcomes;
- Review of the previously planned 11-camera Flock expansion and the separate fixed Motorola Vigilant deployment in the Rose Bowl corridor;
- Consideration of ALPR as a regional investigative resource within Los Angeles County and Southern California; and
- Evaluation of the operational and fiscal consequences associated with discontinuing the program.

REVIEW OF AGREEMENTS FOR SERVICES

Pasadena's original Flock deployment was established under a four-year arrangement beginning after installation in February 2024. Department financial materials identify an overall four-year program investment of approximately $631,350 for the original deployment, including installation and recurring service.

Separate from the original deployment, and prior to the present policy discussion, PPD had already initiated a planned expansion of 11 additional fixed LPR cameras. The expansion order form provides for an initial 48-month term, a 30-day retention period, 11 additional LPR cameras, a first-year subtotal of $34,389.96, annual recurring charges of $33,000 thereafter, and a total contract amount of $133,389.96.

Because the original deployment and the proposed 11-camera expansion arise from separate contractual documents and time periods, the final implementation of any City Council direction should be coordinated with the City Attorney and Finance Department to ensure the applicable obligations are correctly identified.

Contractual Safeguards

In addition to cost and service terms, PPD's review considered contractual protections governing Department information. Relevant safeguards include data ownership, security, authorized access, information sharing, retention and deletion, audit rights, vendor access to or use of Department data, records maintenance, and breach-related obligations. Pasadena's Flock deployment does not rely on a separate third-party ALPR vendor integration to provide access to Pasadena's Flock data, reducing the complexity associated with information moving between multiple ALPR vendor platforms.

DATA OWNERSHIP AND CONTROL

A central consideration in evaluating an ALPR program is control over the information generated by the system. Pasadena's contract language provides that reports, digital files, studies, memoranda, and other specified work prepared by the contractor in furtherance of the work are City property and must be available to the City. Flock has also represented that customers retain ownership and control of their ALPR data and sharing relationships.

Operationally, this means Flock provides and hosts the technology while PPD determines authorized law enforcement uses and controls voluntary sharing relationships within the limits of the platform, City policy, and applicable law.

DATA RETENTION

Pasadena currently maintains a 30-day retention period for routine ALPR data. At the conclusion of that period, data is automatically deleted unless specific information has been lawfully preserved for an investigation or evidentiary purpose.

Flock has recently moved toward a seven-day default retention period while permitting existing customers to maintain an approved retention period. The company has also introduced Evidence Mode to preserve specific records when necessary for an active investigation.

PPD continues to use a 30-day retention period because investigative leads are not always developed immediately. Crimes may be reported after a delay, witnesses or surveillance video may identify a vehicle days later, and detectives may need time to obtain records, conduct interviews, or otherwise develop a vehicle lead. A shorter period could result in relevant information being deleted before investigators know which vehicle to search.

The 30-day period is a policy choice rather than an immutable technical requirement. City Council may consider whether the current period continues to appropriately balance investigative utility with privacy considerations. Any proposed reduction should be evaluated against the effect it may have on delayed-reporting and complex investigations. The vendor has confirmed that retention settings can be changed at any time to a retention timeframe determined by the City and be done up to x times per year.

ACCESS, ACCOUNTABILITY, AND AUDITING

Access to Pasadena ALPR information is restricted to authorized personnel for legitimate law enforcement purposes. Searches are logged and auditable, and PPD requires users to document a case code associated with internal searches.

PPD uses multiple layers of oversight. In addition to routine supervisory review, the Department conducts monthly audits of ALPR activity, performs broader system-level reviews, and uses Flock Safety's Audit Assist algorithms to help identify potentially unusual activity for further administrative review. Multi-factor authentication is mandatory.

PPD also completed a comprehensive audit of network access involving Pasadena's Flock cameras for calendar year 2025. The Department reviewed 5,095,190 records representing 354 unique agency names and examined agency identity, search time, search type, stated reason, queried time frame, filters, and case-number information.

The audit identified no out-of-state agency access. Two searches associated with the Loma Linda Healthcare System California Veterans Affairs Police Department were reviewed further and confirmed to relate to a criminal investigation involving the VA facility, not immigration enforcement or reproductive-health enforcement. The audit found no indication that Pasadena ALPR information was used for immigration enforcement during the reviewed period.

Independent Police Auditor Review

Pasadena's Independent Police Auditor (IPA) independently reviewed PPD's Flock ALPR program in 2026. The IPA received the Department's complete search dataset, access to Department personnel, and direct access to the Flock system. The IPA concluded that Pasadena's ALPR system was generally operating consistently with California law and Department policy and identified meaningful controls designed to limit access and track use.

The IPA's review also found that approximately 70 percent of PPD searches involved a specific license plate already connected to an investigation. Broader descriptive searches were less common and were generally used when investigators had vehicle characteristics but had not yet identified a plate. This pattern is consistent with primarily targeted investigative use rather than broad exploratory searching.

PPD will collaborate with the IPA regarding continued review of the ALPR program (note the frequency – annually, quarterly, etc). The Department's oversight model therefore combines monthly internal audits, larger system-level reviews, algorithm-assisted anomaly detection, and independent civilian oversight.

Outcome Tracking and Performance Measurement

PPD currently tracks significant investigative outcomes associated with ALPR use; however, comprehensive program-wide outcome measurement is limited by the Department's existing CAD/RMS (dispatch records management) environment. ALPR search and alert information is maintained separately from many records documenting subsequent enforcement and investigative outcomes. As a result, determining the ultimate disposition associated with every ALPR alert or search would require substantial manual review and reconciliation of multiple records. As PPD's information systems and

reporting capabilities evolve, the Department should continue exploring methods to more efficiently associate ALPR activity with measurable outcomes, including stolen vehicles recovered, arrests, firearms recovered, missing or at-risk persons located, property recovered, and significant criminal investigations assisted. Improved outcome tracking would provide the Department, City leadership, the Independent Police Auditor, and the public with additional objective information regarding the technology's effectiveness over time.

INTERAGENCY DATA SHARING

Interagency sharing provides investigative value because vehicles associated with crimes frequently travel beyond the jurisdiction where an offense occurred. A vehicle involved in a Pasadena crime may leave the City within minutes, while Pasadena cameras may likewise detect vehicles associated with investigations originating in other California jurisdictions.

Flock implemented significant California-specific restrictions during 2025. National Lookup was disabled for California agencies; out-of-state agencies were blocked from establishing California sharing relationships; existing out-of-state relationships were reviewed and removed; and federal sharing was disabled for California organizations.

In addition to platform-wide restrictions, PPD maintains administrative control over its individual sharing relationships and may restrict or discontinue access when circumstances warrant. In 2026, following publicly reported concerns regarding access to ALPR information through the Northern California Regional Intelligence Center (NCRIC), PPD proactively suspended NCRIC's access to Pasadena ALPR information and subsequently reviewed system audit records to verify that NCRIC access had ceased.

This example demonstrates that interagency access is not automatic or irrevocable. PPD can modify sharing permissions when concerns arise and can use audit records to evaluate subsequent access. Flock's newer offense-filtering capability also provides an additional policy tool by allowing agencies to restrict the offense categories for which another agency may access their cameras.

APPLICABLE LAW AND COMPELLED DISCLOSURE

There is an important distinction between voluntary access to Pasadena ALPR information through the Flock platform and disclosure required through lawful judicial process.

California law establishes requirements governing ALPR information, including written usage and privacy policies, legitimate law enforcement use, access controls, logging, auditing, and reasonable security safeguards. California law also limits the use of state and local law enforcement resources for federal civil immigration enforcement.

An administrative immigration warrant or subpoena is not the same as a criminal judicial warrant signed by a judge or magistrate. California law significantly restricts voluntary local-law-enforcement assistance with civil immigration enforcement. By contrast, a valid judicial warrant, court-issued subpoena, or other binding judicial order may compel production of responsive information.

Accordingly, disabling federal access to Pasadena's Flock system does not mean that ALPR information could never be lawfully disclosed to a federal agency. The safeguards prevent routine or voluntary platform access. If Pasadena or Flock were served with legally binding judicial process seeking specific ALPR information, the request would be evaluated under applicable law and, where appropriate, reviewed by the City Attorney. The City may also evaluate jurisdiction, scope, statutory authority, and potential grounds to challenge an overbroad or legally deficient request.

Receipt of legal process does not necessarily require immediate disclosure of ALPR information. Depending on the nature of the request, the City may have an opportunity to evaluate its validity, scope, jurisdiction, and legal authority before producing responsive information. Where appropriate, the City Attorney may advise regarding objections, efforts to narrow the request, a motion to quash, or other available legal remedies. Accordingly, compulsory legal process should not be understood to mean that Pasadena would automatically or immediately disclose ALPR information upon receipt of any federal request.

Because this section summarizes legal concepts for operational and policy purposes, final legal language should be reviewed by the City Attorney.

INVESTIGATIVE AND PUBLIC SAFETY VALUE

ALPR technology has become an increasingly important investigative resource for PPD, particularly in cases where investigators have limited suspect information but know, or are able to develop, information regarding a vehicle associated with a crime.

ALPR technology is also a widely used regional law-enforcement resource throughout Los Angeles County and Southern California. Large municipal and county agencies, including the Los Angeles Police Department and Los Angeles County Sheriff's Department, use ALPR technology as part of the broader regional investigative environment. Because vehicles frequently move across jurisdictional boundaries, the usefulness of ALPR information extends beyond the city in which a crime occurred.

Vehicles are frequently an important component of criminal investigations. Suspects may use vehicles to travel to and from crime scenes, transport stolen property, flee from law enforcement, or move between jurisdictions. Witnesses or surveillance systems may capture a vehicle description even when a suspect's identity or full license plate is initially unknown. ALPR information provides an additional means of developing those leads.

Human Verification

ALPR information serves as an investigative lead and is not intended to independently establish reasonable suspicion or probable cause. Before taking enforcement action based on an ALPR alert, personnel are expected to verify the plate and underlying vehicle status through appropriate law-enforcement databases. Human verification is an important safeguard against inaccurate plate reads, outdated records, or other circumstances that could produce an erroneous alert.

Stolen Vehicle Recovery

During 2025, PPD recovered 89 stolen vehicles. Of those recoveries, 27 vehicles - more than 30 percent - were recovered as the direct result of a Flock ALPR alert. Those vehicles represented approximately $700,000 in recovered stolen property. Flock alerts constituted the largest single identified source of PPD stolen-vehicle recoveries during that period.

ALPR alerts have also led officers to additional evidence and public-safety concerns beyond recovery of the vehicle itself. Department case examples include stolen-vehicle alerts that resulted in the recovery of loaded firearms and an incident in which officers located a stolen vehicle, arrested the driver, and identified a juvenile occupant who had been reported missing.

Violent Crime and Major Investigations

The technology has provided investigative leads in homicide, robbery, sexual assault, arson, firearms, and other serious criminal investigations.

In the January 28, 2026, Ashtabula Street homicide, detectives used ALPR information to identify vehicles associated with the offense. Investigators subsequently located and arrested a suspect, who confessed within approximately 12 hours of the homicide.

In April 2026, four masked suspects assaulted and robbed a juvenile walking home from school. Investigators developed information regarding the suspect vehicle and used ALPR information as part of the investigation, contributing to the identification and arrest of a suspect.

In June 2026, officers investigated an armed road-rage incident in which a motorist was threatened with a firearm. ALPR information assisted investigators in identifying and locating the involved vehicle. The suspect, a convicted felon, was arrested and a loaded firearm was recovered.

In July 2026, investigators used ALPR information to assist in identifying a vehicle associated with a strong-arm robbery. The investigation resulted in arrests and recovery of the victim's stolen property.

Department materials also document ALPR use in a 2025 church arson investigation, an armed commercial robbery investigation, and an investigation involving the sexual assault of a disabled woman by a driver posing as a rideshare operator. In each instance, vehicle information and ALPR data assisted investigators in narrowing leads, locating vehicles, identifying suspects, or developing additional evidence.

Investigative Efficiency and Clearance Rates

Traditional vehicle investigations can require personnel to review hours of surveillance video, conduct neighborhood canvasses, contact businesses and residents, obtain records, interview witnesses, and coordinate with surrounding jurisdictions. Those techniques remain important. ALPR information does not replace traditional investigation; it can substantially narrow the investigative field and allow detectives to focus resources on corroborating evidence, interviews, warrants, and arrests.

PPD's overall offense clearance rate increased from 28.96 percent in 2023, to 31.10 percent in 2024, and to 35.26 percent in 2025. The Department does not attribute the entirety of this increase to ALPR technology. Clearance rates are influenced by staffing, investigative practices, crime patterns, evidence availability, community cooperation, and numerous other factors. The individual case outcomes provide more direct evidence of the technology's contribution than the clearance-rate trend alone.

EXISTING DEPLOYMENT AND PREVIOUSLY PLANNED EXPANSION

PPD currently operates 61 fixed-position Flock ALPR cameras. Separately, PPD operates 11 fixed Motorola Vigilant ALPR cameras in the Rose Bowl corridor. The IPA's 2026 Flock audit addressed the 61 Flock cameras; the 11 fixed Vigilant cameras were outside the scope of that particular audit. PPD no longer operates vehicle-mounted Vigilant ALPR cameras.

The fixed Vigilant cameras remain subject to PPD's ALPR policy framework, legal requirements, retention practices, auditing procedures, and information-sharing rules. Their records are retained for 30 days.

Pasadena contains more than 2,300 intersections, while the existing Flock cameras are deployed at approximately 20 intersections, representing less than 1 percent (approximately 0.87 percent) of the City's intersections. The Flock system therefore provides targeted coverage at selected locations rather than comprehensive surveillance of the City's roadway network.

Prior to the current discussion regarding Pasadena's continued use of Flock ALPR technology, the Department had already initiated plans to expand the Flock network by 11 cameras. The planned expansion was intended to address identified geographic and roadway gaps and was not developed in response to the present review.

The expansion is supported in part by approximately $34,000 previously awarded through the U.S. Department of Justice Edward Byrne Memorial Justice Assistance Grant Program. Deployment of the additional cameras has been postponed pending further City Council discussion and direction. The Flock order form identifies 11 additional LPR cameras, a 48-month term, a continued 30-day retention period, a first-year cost of $34,389.96, annual recurring charges of $33,000, and a total four-year amount of $133,389.96.

The planned expansion has not been implemented. Deployment of the 11 additional Flock cameras has been postponed pending further City Council discussion and direction regarding the ALPR program. If ultimately approved, the expansion would increase the Flock network from 61 to 72 cameras. Even after expansion, the Flock network would continue to cover only a small portion of Pasadena's intersections. The purpose is to improve strategic coverage at selected locations rather than establish continuous or comprehensive vehicle monitoring.

RELATIONSHIP TO A FUTURE ACTIVE INTELLIGENCE CENTER

Separately from the previously planned 11-camera expansion, PPD has publicly discussed the potential future development of an Active Intelligence Center (AIC) as part of the Department's longer-term public safety strategy. The contemplated concept would provide a centralized environment in which authorized personnel could receive and analyze information from multiple approved public-safety systems to improve situational awareness and direct resources more effectively.

An AIC would not depend upon Flock Safety as a specific vendor. However, a strategically deployed fixed camera and ALPR network would be an important source of vehicle-related information within the type of integrated public-safety environment contemplated by an AIC. For example, information from witnesses, dispatch calls, fixed ALPR cameras, acoustic gunshot detection, and other separately authorized systems could potentially be evaluated together during a significant incident rather than as isolated sources.

Accordingly, elimination of Pasadena's fixed ALPR capability should be evaluated not only in terms of the investigations the technology supports today, but also in terms of the City's longer-term public-safety technology strategy. Discontinuation would remove an existing source of vehicle intelligence that could otherwise form one component of a future integrated public-safety environment.

POLICY REVIEW AND MODERNIZATION

In addition to existing operational and technological safeguards, PPD is reviewing and updating Department Policy 462 governing Automated License Plate Readers. The proposed revisions remain in draft form and are subject to legal review and subsequent Department staff review and approval before implementation.

The draft reflects PPD's effort to ensure its written policy accurately addresses current ALPR technology, Department practices, applicable legal requirements, privacy safeguards, accountability, and public transparency. Provisions under consideration include expressly identifying the Department's current fixed-camera ALPR platforms, establishing a maximum 30-day retention period for routine ALPR data, expressly addressing restrictions on the use or sharing of City-collected ALPR information for federal immigration enforcement, strengthening provisions governing interagency sharing, and maintaining requirements for regular audits and public posting of the Department's ALPR policy and related procedures.

The policy review also reflects the evolution of PPD's ALPR program. The existing written policy contains older retention language that does not reflect the Department's current 30-day operational

practice. If approved, the proposed revision would formally align the written retention provision with current practice and further clarify safeguards and transparency expectations.

The modernization effort complements safeguards already being used by the Department, including monthly audits of ALPR activity, broader system reviews, Flock's Audit Assist tools, administrative control over sharing relationships, the public Flock Transparency Portal, and collaboration with Pasadena's Independent Police Auditor. The draft should therefore be viewed as an ongoing policy-development process intended to formalize and strengthen the governance framework surrounding current ALPR operations, not as an already adopted policy.

FISCAL IMPACT

Department financial materials estimate the original four-year Flock program investment at approximately $631,350. Based upon current Department calculations, discontinuing the original agreement at this stage could result in approximately $216,041 in financial impact, consisting of approximately $152,500 in remaining contractual obligations and approximately $63,541 already paid toward services that would no longer be utilized.

The estimate does not monetize operational consequences such as investigative hours, recovered property, or other law-enforcement resources that may be required to develop information otherwise obtained through ALPR technology.

The previously planned 11-camera expansion remains pending and the associated agreement has not been formally entered into. Accordingly, discontinuation of the planned expansion would not result in the same contractual financial impact associated with the existing Flock deployment. However, the City would forego approximately $34,000 in previously awarded U.S. Department of Justice Edward Byrne Memorial Justice Assistance Grant funding earmarked for the additional Flock cameras.

FINDINGS

1. PPD's ALPR program has demonstrated measurable investigative value, including use in violent-crime investigations and more than 30 percent of Pasadena's recovered stolen vehicles in 2025.
2. ALPR is a regional investigative resource used throughout Los Angeles County and Southern California. Pasadena's participation allows vehicle-related investigative information to be used in an environment where suspects and vehicles routinely cross jurisdictional boundaries.
3. Pasadena currently retains routine ALPR information for 30 days. A shorter period remains available for City Council consideration, but any change should account for delayed reporting and the time required to develop vehicle leads.
4. PPD uses layered accountability measures, including monthly audits, broader system-level review, logged searches, case-code requirements, multi-factor authentication, and Flock Audit Assist algorithms.
5. Pasadena's Independent Police Auditor independently reviewed the Flock program and found it operating consistently with California law and Department policy, with meaningful controls limiting access and tracking use. Approximately 70 percent of PPD searches involved a specific license plate already connected to an investigation.
6. Pasadena maintains control over its voluntary sharing relationships and has demonstrated its ability to suspend access and verify that access ceased when concerns regarding another entity arose.
7. Disabling voluntary federal or interagency platform access does not supersede valid legal process. Responsive ALPR information may still be subject to disclosure pursuant to a valid judicial warrant, court-issued subpoena, or other binding judicial order, subject to applicable law and legal review.

8. PPD has initiated a review and proposed modernization of Policy 462 to better address current technology, retention, sharing, auditing, privacy safeguards, and transparency. The proposed revisions remain subject to legal review and Department staff review and approval.
9. The previously planned 11-camera Flock expansion predates the current policy discussion and would increase the Flock network from 61 to 72 cameras while maintaining a 30-day retention period. PPD also separately operates 11 fixed Motorola Vigilant cameras in the Rose Bowl corridor.
10. A functioning fixed ALPR network may provide useful infrastructure for future, separately approved public-safety technology initiatives, including a potential Active Intelligence Center.
11. Discontinuation would have both operational and fiscal consequences, including an estimated $216,041 financial impact associated with the existing Flock agreement. Separately, discontinuing the pending 11-camera expansion would result in the City foregoing approximately $34,000 in previously awarded DOJ grant funding earmarked for the additional Flock cameras.
12. Standardized tracking of ALPR-related outcomes would provide additional objective measures of program effectiveness and support future oversight and public reporting.

OPTIONS FOR CITY COUNCIL CONSIDERATION

Option 1 - Continue Existing Program and Safeguards. Maintain the existing 30-day retention period, current California law-enforcement sharing settings, auditing, case-code requirements, and existing privacy safeguards.

Option 2 - Continue with Enhanced Oversight and Transparency. Maintain ALPR operations while continuing monthly audits, broader periodic system reviews, formal review of sharing relationships, use of Audit Assist, collaboration with the Independent Police Auditor, standardized outcome tracking, periodic Public Safety Committee reporting, and enhancement of existing public-facing transparency resources.

Option 3 - Modify Retention or Sharing Parameters. Direct PPD to evaluate a shorter retention period, additional offense-based sharing restrictions, or other modifications while preserving ALPR capability for Pasadena investigations.

Option 4 - Further Restrict Interagency Sharing. Maintain Pasadena's cameras for PPD use while limiting some or all external California law-enforcement access. This would increase local control but reduce reciprocal regional investigative capability.

Option 5 – Seek Alternate ALPR Solutions. Direct staff to issue an RFP for ALPR services and transition away from the Flock system as quickly as possible without having a lapse in service.

Option 6 - Discontinue the ALPR Program. Terminate or decline to continue the program, subject to review of contractual obligations, grant implications, fiscal impact, and development of alternative investigative resources.

POLICE DEPARTMENT ASSESSMENT

PPD's review found that ALPR technology provides substantial public-safety and investigative value while Pasadena retains meaningful control over retention, access, auditing, and voluntary interagency sharing.

The Department's 2025 audit found no out-of-state agency access and no indication that Pasadena ALPR information was used for immigration or reproductive-health enforcement during the reviewed period. Independent review by Pasadena's IPA likewise found the Flock program operating consistently with California law and Department policy and identified meaningful controls designed to limit access and track use.

PPD's oversight framework continues to evolve. The Department conducts monthly audits, uses broader system-level reviews and Flock Audit Assist algorithms, collaborates with the IPA, maintains a public Transparency Portal, and has initiated a modernization of Policy 462. The draft policy remains subject to legal and Department staff review and approval.

No technology-based investigative system is without privacy, security, accuracy, or misuse risks. ALPR information must therefore remain an investigative lead subject to human verification, policy controls, auditing, training, transparency, and administrative oversight. Based upon the information reviewed, the Department believes those risks can be appropriately managed without eliminating a tool that has demonstrated significant value in identifying offenders, recovering stolen property, locating vehicles associated with violent crime, and advancing criminal investigations.

PPD therefore recommends continuation of the ALPR program, with continued auditing, independent oversight, transparency, policy modernization, and improved outcome measurement, while preserving the City Council's ability to modify retention and sharing parameters as policy considerations evolve.

ATTACHMENTS

Exhibit I - PPD Flock Audit Memo, March 2, 2026

Exhibit II - Independent Police Auditor Flock Audit and Addendum, July 9, 2026

Exhibit III – Automated License Plate Reader Policy 462

Exhibit IV – Automated License Plate Reader Procedures Manual

EXHIBIT I

MEMORANDUM - CITY OF PASADENA

Police Department

March 2, 2026

TO: Gene Harris, Chief
Pasadena Police Department

THRU: Marcia Taglioretti, Commander
Criminal Investigations Division

FROM: Carlo Montiglio, Lieutenant
Criminal Investigations Division

RE: **Flock Audit**

Summary of Issue:

This memorandum is made for the purpose of determining whether any agency outside California or any federal agency ran a search on the Pasadena CA PD network during the 2025 audit period, and to document the purpose, method, findings, and conclusion of that review.

Background:

Method

- Parsed all 12 monthly Pasadena CA PD network-audit CSV files contained Flock Network files.
- Reviewed all 5,095,190 audit rows and normalized the "Org Name" field to identify unique agencies (354 total unique names).
- Flagged records for review where the agency name appeared federal in nature (for example, marked "[Federal]" or containing an explicit federal identifier or abbreviation).
- Reviewed all agency names that did not expressly contain "CA" or "California" to determine whether any out-of-state agency appeared in the logs.
- Examined the associated audit fields for any flagged record, including search time, search type, stated reason, time frame, filters, and case-number field.

Findings

1. Out-of-state agencies

   No agency outside California was identified in the 2025 Pasadena network-audit logs based on the agency names recorded in the "Org Name" field.

To confirm that result, the review further isolated all agency names that did not expressly include "CA" or "California." Those names are listed below.

Agency Name Reviewed	Search Count
NCRIC	176,256
Cal Fire	7,371
Monterey County District Attorney's Office	614
Yuba County Sheriff's Office	288
Shasta County SO	159
Blue Lake Rancheria Tribal PD	26
Solano County Special Investigations Bureau	2

None of the above entries reflect an agency outside California. Several omit the state abbreviation in the name field, but they are California-based entities or California regional systems as recorded in the audits. The NCRIC is the Northern California Regional Intelligence Center, a state recognized intelligence center with sworn local law enforcement. Cal Fire and Monterey County DA use sworn California peace officers as does the Solano County Special Investigations Bureau. The Blue Lake Rancheria Tribal PD is not a federal agency, but a state based tribal police department.

2. Federal agencies

One federal agency identifier was found in the 2025 audit logs: "[Federal] Loma Linda Healthcare System CA Veterans Affairs PD." That agency appeared in two audit records, both in the May 2025 file.

Agency	Search Time (UTC)	Search Type	Purpose / Reason	Time Frame Queried	Case #	Source File
[Federal] Loma Linda	05/27/2025, 04:23:56 PM UTC	lookup	INV	05/20/2025, 04:23:55 PM UTC to	—	5_1_2025-5_31_2025-Pasadena

Healthcare System CA Veterans Affairs PD				05/27/2025, 04:23:55 PM UTC		CA PD-Network-Audit.csv
[Federal] Loma Linda Healthcare System CA Veterans Affairs PD	05/29/2025, 03:56:41 PM UTC	search	Investigation	04/29/2025, 03:56:36 PM UTC to 05/29/2025, 03:56:36 PM UTC	***	5_1_2025-5_31_2025-Pasadena CA PD-Network-Audit.csv

There were two total searches; both of which occurred in May 2025. One was logged as "lookup" with a reason "INV," and one was logged as "search" with reason "Investigation."

I contacted the Veterans Affairs Police Department and spoke to Detective Helmick, who conducted the above inquiries. He informed me that the Veterans Affairs Police Department is a facilities-based police department that is responsible for the security of the Veterans Hospitals in Loma Linda, CA and does investigations related to crimes at the hospital. He confirmed that the Veterans Affairs Police does not conduct immigration related enforcement or enforcement related to reproductive health and that the above searches were regarding a criminal investigation.

State Statutes

The California state Legislature passed SB 34 in 2015, requiring basic safeguards for the use of ALPRs, which includes a prohibition on California agencies from sharing data with non-California agencies.

The California state Legislature passed SB 54 (California Values Act) in 2017, which limits how local police cooperate with federal immigration enforcement. Agencies cannot use resources to assist federal immigration enforcement except in narrow circumstances. Agencies cannot share personal information with immigration authorities unless required by federal law. Agencies cannot provide access to databases for immigration enforcement purposes.

Conclusion

Based on review of all 5,095,190 search records in the 2025 Pasadena CA PD network-audit logs, no out-of-state agencies were identified. A federal agency was identified in two audit entries, the

Loma Linda Healthcare System California Veterans Affairs Police Department. This agency conducted two searches on Pasadena's network which both appeared in the May 2025 audit file.

Accordingly, the audit review supports the conclusion that there was no out-of-state agency searches recorded in the provided 2025 data, but there were two recorded federal-agency searches that were used for narrow criminal investigative purposes.

This report is limited to what is reflected in the audit data fields provided in the CSV files. It does not infer investigative purpose beyond the related audit metadata.

A review of the data supports that all uses of the system were tied to legitimate law enforcement investigations, and there was no indication of any use for immigration enforcement, in compliance with both SB 34 and SB 54.

EXHIBIT II

6510 Spring Street, #613
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To: Esprit Jones, Chair, Community Police Oversight Commission

Cc: Raúl Ibañez, Commissioner, CPOC
Chief Eugene Harris, Pasadena Police Department
Deputy Chief Art Chute, PPD
Commander Marcia Taglioretti, PPD

From: Teresa Magula, Independent Police Auditor

Date: July 9, 2026

Subject: IPA Review of Pasadena Police Department's compliance with laws and policy related to Flock Safety's Automated License Plate Recognition systems

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Introduction

The Community Police Oversight Commission (CPOC) has reviewed the Pasadena Police Department's use of Automated License Plate Recognition (ALPR) technology in the past. This current review reflects a renewed interest in the system based on two factors.

First, there have been growing concerns, raised by community organizations both locally and across California, about whether this type of technology could be used for immigration enforcement or other purposes that are restricted under state law. These concerns have led to increased attention on how agencies access and use this data, and whether appropriate safeguards are in place.

Second, the PPD recently received grant funding to expand its use of ALPR cameras. The addition of new cameras created an opportunity to take a fresh look at how the system is being used, how access is controlled, and how the technology is being deployed across the City.

Together, these factors prompted this review, which focuses on whether the system is being used appropriately, whether safeguards are working as intended, and how the system's growth may affect the community going forward.[1]

ALPRs in Pasadena

The Pasadena Police Department (PPD) uses Automated License Plate Recognition (ALPR) technology provided by Flock Safety to support criminal investigations. The system captures images of license plates and certain vehicle characteristics from fixed-position cameras installed in public locations throughout the City.

The Department began deploying ALPR cameras in 2023 and currently operates sixty-one fixed cameras across multiple Council districts. In April 2025, PPD presented to the City Council a proposal to expand its use of ALPR cameras using grant funding. The Department explained that the eleven additional cameras are intended to support criminal investigations, deter crime, and allow for coordinated use with other law enforcement agencies. As part of that proposal, Department personnel identified new camera locations based on investigative needs. When implemented, PPD will operate a total of seventy-two ALPR cameras in the City.

Access to the system is limited to authorized Department personnel, including officers, supervisors, dispatchers, and detectives. The data may be searched to determine whether a vehicle has been detected by participating cameras,

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[1] Given the rapidly evolving nature of developments related to ALPRs generally, and to data sharing and regional access, this memo reflects information available as of June 18, 2026. Additional developments may have occurred between the time of finalization and the July 9, 2026, meeting of the Community Police Oversight Commission.

both within Pasadena and through authorized data-sharing relationships with other California law enforcement agencies.

According to the Department, ALPR data is used primarily in connection with criminal investigations, including investigations involving violent crime, property crime, stolen vehicles, and missing persons. The system also generates alerts when a vehicle of interest is detected in the area, and the data can also be reviewed during follow-up investigations to assess vehicle movement associated with reported incidents.

Per policy, ALPR data is stored in an encrypted cloud environment and is retained for 30 days before being automatically deleted, unless it is retained in connection with a specific, active investigation. All system access requires user authentication, and all searches are logged and subject to audit. The Department maintains a written policy governing access, authorized uses, data retention, and security safeguards.

Legal Framework

There are two main laws governing the use of ALPR data in California. The first, California's SB 34, enacted in 2015, regulates the use of ALPR data by requiring law enforcement agencies to limit use to authorized purposes and implement policies governing access, sharing, and auditing of the data.[2] It precludes the sharing of ALPR data with federal and out-of-state agencies.

The second, enacted in 2018, is California Senate Bill 54, which limits the use of state and local law enforcement resources, including databases and technology systems, to assist in federal immigration enforcement. [3] As applied to ALPR data, SB 54 prohibits:

- Accessing or using ALPR data for immigration enforcement purposes
- Sharing non-public ALPR data with federal immigration authorities (e.g., ICE, CBP), absent a lawful exception

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[2] Civil Code § 1798.90.5 et seq.

[3] Gov. Code § 7284 et seq.

SB 54 also constrains data use in joint task force contexts and requires safeguards to prevent immigration-related misuse. Together, the two laws prohibit participation in data-sharing arrangements that enable immigration enforcement through indirect or downstream access.

Review Methodology

To complete this review, we looked at the system from several different angles.

First, we reviewed the Pasadena Police Department's own internal audit, which was presented to the City Council on March 18, 2026.[4] For that audit, the Department analyzed every search made in the automated license plate reader system during 2025: more than five million searches in total. [5]

To understand who was using the system, the Department looked at the names and identifiers tied to each search to determine whether it came from a California law enforcement agency. Searches that did not clearly appear to be California-based were flagged and reviewed more closely. This process helped identify use by organizations such as the Northern California Regional Intelligence Center (NCRIC), the California Department of Forestry and Fire Protection (primarily for arson investigations), and certain tribal police agencies, all of which are authorized users within California.

Using this approach, the Department confirmed that two searches were connected to a federal entity. These searches were conducted by Veteran's Affairs Police related to a criminal case at a federal facility in Loma Linda, California. The Department reviewed those searches and determined they were appropriate and not related to immigration enforcement. No other direct use of the system by federal agencies was identified.

The Department's internal audit also included a review of how Pasadena's own personnel were using the system to ensure that their searches followed

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[4] The Department's presentations related to ALPR are available as part of the CPOC July 9, 2026 Agenda Packet for reference only.

[5] While the query information is retained for audit purposes, the actual output (the license plate photos) are not retained beyond 30 days as cited in the introduction.

Department policy. They found that all employees who accessed the system were authorized and did so for law enforcement-related purposes only. PPD noted that some searches did not include a specific case number, and reminded those specific employees to always include a case number when conducting searches (we discuss this finding in more detail, below).

Second, we conducted our own review of the data. The Department provided us with the full set of records, which we analyzed using a combination of manual review and automated tools due to the large size of the files.

Third, we met with Department personnel who are experts in the system to better understand how it is used in practice. They explained how officers access the system, how searches are conducted, and how the information is used in investigations.

Finally, we were given direct access to view the system itself. This allowed us to see how searches are performed and how the system tracks and records user activity. The Department was responsive to our questions and provided additional clarification as needed.

These combined steps informed the findings and conclusions that follow.

Review Findings

Overall, our review found that Pasadena's ALPR system is being used in a way that is generally consistent with California law and Department policy, and that the system includes meaningful controls to limit access and track use. We also highlight recent developments in access, and where new system design and audit/oversight tools may improve transparency and ongoing monitoring.

The findings below are organized around the key questions and concerns identified by the CPOC and community members.

Finding 1: PPD ALPR System is Overall Compliant with California Laws

Our review found that Pasadena's system was used in a way that follows California law and Department policy. We did not find evidence that the system was used for immigration enforcement or for any purpose that would not be allowed under state law.

Review of the stated reasons for ALPR searches identified no overt indicators of use for immigration enforcement purposes. Search justifications did not reference immigration status, civil immigration enforcement, or federal immigration agencies.

The geographic parameters associated with ALPR searches were confined to California, consistent with state law requirements. During the months reviewed, all but two verifiable searches – the Veteran's Affairs searches previously identified by PPD – appear to have been conducted within the California law enforcement "ecosystem."

Finding 2: Review Shows Legitimate Law Enforcement Use of ALPR Data

Searches of PPD ALPR data during the review period were associated with legitimate law enforcement purposes. A significant portion of searches were related to auto theft, burglary, robbery, assault, and homicide investigations. Other searches were connected to criminal investigations involving wanted persons and domestic violence incidents. Others related to missing persons or welfare checks.

Each ALPR query documented a stated reason for the search, with the majority of searches identifying a specific investigation of a potential violation of state law.

Finding 3: Appropriate Limitations and Controls on Participating Agencies Identified

Pasadena's ALPR system does not allow just anyone to access its data. Instead, it limits access to a defined group of approved law enforcement agencies -- fewer than four hundred -- within California. Only agencies that have been authorized to participate in these data-sharing networks can view or search Pasadena's information.

Even among these agencies, access is not automatic or uniform. Some agencies choose to limit access to their own data and operate within "closed" networks, meaning they do not share information with other jurisdictions. Others allow sharing but require explicit approval before another agency can view their data.

As a result, data sharing within the system depends on a combination of approvals and agency-by-agency decisions, rather than open or unrestricted access.

Finding 4: Searches Are Mostly Focused on Known Individual Vehicles, Not Broad Sweeps

The review found that most searches of Pasadena's data were focused on specific, known vehicles. About 70% of searches were for a particular license plate, meaning officers were looking for a vehicle already connected to an investigation.

The remaining searches were broader and used vehicle descriptions, such as color, make, or type, rather than a specific license plate. These types of searches were used much less often and generally occurred in situations where a vehicle was involved in a crime, but the license plate was not known. For example, this may happen in cases involving weapons or narcotics, where officers are trying to identify a suspect vehicle based on limited available information.

Overall, this pattern shows that the system is primarily used in a focused way to support specific investigations, rather than for broad or exploratory searches.

Finding 5: No Direct Searches by Federal or Out-of-State Agencies

Aside from the two searches noted above, searches of PPD ALPR data were conducted by California police departments, Sheriff's offices, district attorneys' offices, and state agencies such as the California Highway Patrol (CHP), as well as members of NCRIC (see below for further discussion and an access update).[6]

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[6] NCRIC is a regional public safety center established in 2007 as part of California's Statewide Threat Assessment System intended to bring law enforcement and other public agencies together in a "fusion center," or central hub to collect, analyze, and disseminate information between all levels of government. NCRIC's role is to provide support to law enforcement and public safety agencies as well as critical infrastructure security managers through collaboration and information sharing.

The review identified no direct searches conducted by federal law enforcement agencies aside from the two noted above. No direct searches by out-of-state agencies were identified.

Finding 6: Frequent Use by Regional Intelligence Center and Multi-Agency Investigations

Some community members have raised concerns that regional intelligence centers, often called "fusion centers," such as NCRIC, may share information too broadly or with federal partners in ways that are difficult to track. Those concerns have been raised in Pasadena and across California and are important to acknowledge.

Effective June 18, 2026, the Department disabled NCRIC access to its ALPR data; a proactive effort to ensure that Department-collected data is not subject to unintended or indirect access through regional systems. This may reduce the likelihood of inadvertent or unauthorized data sharing. It also demonstrates the Department's willingness to reassess and strengthen its safeguards in response to evolving information about regional access pathways.

These changes follow two recent developments that have altered the data-sharing landscape. First, effective June 1, 2026, NCRIC discontinued its Single Sign-On (SSO) access to Flock, eliminating its role as a centralized gateway for ALPR searches and requiring users to access the system through agency-specific accounts. Second, in June 2026, the San Francisco Police Department reported that its ALPR data had been queried by analysts operating through NCRIC on behalf of federal or out-of-state agencies, highlighting the challenges of monitoring indirect access through regional systems and the limits of relying on organizational identifiers alone to understand how data is being used.

Against this backdrop, it is important to understand how the system operated during the audit period. At that time, NCRIC was among the more frequent external users of Pasadena's ALPR system. While this level of activity may initially raise questions, it is broadly consistent with NCRIC's role as a regional coordination hub supporting multi-agency investigations. Access through NCRIC was not open or unrestricted: users were required to be authorized, to conduct searches for a valid law enforcement purpose, and to log their activity.

Our review confirmed that searches were conducted through identifiable user accounts and recorded in the system, allowing for audit review. Some searches referenced federal agencies or shared systems, such as the Drug Enforcement Administration, Bureau of Alcohol, Tobacco, Firearms, or the National Crime Information Center,[7] reflecting participation in joint or task force investigations.

Overall, while the Department's practices during the audit period included appropriate access controls and logging, the recent changes to NCRIC access and Pasadena's decision to disable that access reduce potential risks associated with indirect data sharing. At the same time, these issues reinforce the importance of ongoing oversight. Multi-agency investigations remain a legitimate and common use of ALPR systems, and it remains critical that each search is clearly justified, properly logged, and subject to review.

A broader statewide audit of fusion centers, including NCRIC, is currently underway and may provide additional insight into how these systems manage data sharing and access controls over time. [8]

Finding 7: Improvements to Search Documentation and Audit Tools

During the review period, there were two areas where Flock's system design limited how effectively searches could be reviewed.

First, the system previously allowed users to enter very general explanations, such as the term, "investigation," when documenting why they conducted a search. These entries did not always identify a specific case or incident, which

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[7] NCIC is a nationwide criminal justice information system maintained by the FBI. It provides authorized law enforcement agencies with access to records related to stolen vehicles and property, wanted and missing persons, protection orders, and other criminal justice information. The system is available to federal, state, tribal, and local law enforcement agencies for legitimate law enforcement purposes and is subject to strict access, use, and audit controls.

[8] The California State Auditor is performing an independent audit of the operation of California's "fusion centers," which includes NCRIC. The goal of the comprehensive audit is, among other things, to assess how the fusion centers protect against the unauthorized disclosure of information. https://www.auditor.ca.gov/reports-coming-soon/2026-134/

made it difficult to confirm the exact purpose of the search. In response, Flock reported that it updated the system in late 2025 to require users to enter a case number or similar, specific identifier before completing a search. This change is expected to improve accountability by ensuring that each search can be linked to a specific investigation.

Second, the system historically relied on manual review to identify potential misuse, which can be challenging given the high volume of searches. The vendor has since introduced new audit tools designed to automatically flag unusual activity. These tools can identify patterns such as a user conducting an unusually high number of searches or searches that fall outside the standard thirty-day data retention period.

Although these enhancements were not fully in place during the audit period, they represent important improvements that will support more effective oversight going forward. PPD has indicated that it plans to incorporate these tools into its regular system review practices, which should allow for earlier identification of potential issues and more efficient monitoring of compliance.

ALPR Camera Placement and Community Equity Considerations

Community members have raised concerns that ALPR cameras are concentrated in certain parts of Pasadena, particularly in areas where many residents are people of color. Those concerns are supported by the City's own data: the Department's various presentations show that cameras are not evenly distributed across the City, with some council districts having a significantly higher number of cameras than others, and at least two districts located along the City's borders having none. This uneven distribution is real and visible, and it reasonably contributes to concerns about fairness and impact.

PPD explained that camera locations are chosen based on factors such as traffic flow, major roadways, crime statistics, and where vehicles enter and leave the City. These criteria are tied to how the technology works, since the system is designed to capture vehicles related to crimes moving through key corridors.

Based on the information reviewed, there is no evidence that the Department selected camera locations based on race or ethnicity. The placement strategy is consistent with state law and common practices in other jurisdictions: Pasadena's approach is aligned with other southern California jurisdictions that deploy ALPR cameras primarily along arterials and high-traffic corridors, such as neighboring Burbank. While regional alignment does not eliminate community concerns, it does indicate that Pasadena's methodology is not an outlier within the broader law enforcement landscape.

At the same time, the concentration of cameras in certain districts, and the absence in others, makes it understandable that residents may question whether the system is distributed equitably. Because major roadways and high-traffic corridors often run through denser or historically underserved parts of the City, this placement approach can result in more cameras being located in areas where communities of color live, even if those neighborhoods were not specifically targeted for their demographic makeup.

In short, the resulting distribution does have uneven geographic impacts. Recognizing both of these points - the legitimacy of the Department's approach and the validity of community concerns - is important for maintaining trust going forward.

From an oversight perspective, it is important to distinguish between placement *intent* and placement *impact*. While the Department's stated criteria for location selection focus on vehicle movement and crime patterns (not race or ethnicity), the City's geography and transportation infrastructure mean that major roadways, commercial corridors, and entry and exit routes often pass through denser and historically underserved neighborhoods. As a result, a placement strategy that prioritizes traffic flow and ingress and egress may yield a concentration of cameras in areas where residents of color are more likely to live, even in the absence of intentional demographic targeting.

Based on all of the above factors, we note two opportunities to strengthen public trust and future oversight without undermining the lawful investigative use of ALPR technology:

- Continued communication regarding future expansion: As the Department considers deploying additional cameras, explaining technical constraints or investigative needs could improve legitimacy, even when final placement decisions remain data-driven. We note that the Department has presented

in numerous community-facing sessions, such as at CPOC, Public Safety Committee, and City Council meetings, and encourage continued dialogue in community forums.

- Periodic re-evaluation of camera placement: Ongoing, transparent assessment of whether camera placement continues to align with current crime patterns, traffic flows, and community expectations would support adaptive and accountable use of the technology.

Conclusion

The IPA encourages the CPOC to continue its engagement with PPD regarding the use of ALPR technology. While this review found that the system is generally being used in a manner consistent with state law and Department policy, several areas identified in this report, particularly related to documentation practices, audit tools, and camera placement, would benefit from continued monitoring over time.

As the program expands, the Commission may wish to request periodic updates from the Department on system use, audit results, and camera deployment, including how placement decisions are communicated and how community concerns are addressed. Ongoing dialogue and regular review will help ensure that the system continues to be used appropriately and transparently.

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To: Esprit Jones, Chair, Community Police Oversight Commission

Cc: Raúl Ibañez, Commissioner, CPOC
Chief Eugene Harris, Pasadena Police Department
Deputy Chief Art Chute, PPD
Commander Marcia Taglioretti, PPD
Commander Karen Peterson, PPD

From: Teresa Magula, Independent Police Auditor

Date: July 9, 2026

Subject: Addendum to Item #4

Clarification on Scope of Item #4

The Community Police Oversight Commission directed OIR Group to review the Pasadena Police Department's Flock Safety Automated License Plate Recognition (ALPR) system. Consistent with that assignment, the report focused on the Department's Flock Safety program.

Accordingly, references in the report to the Department operating 61 fixed ALPR cameras refer specifically to the Flock Safety system that was the subject of this review.

Motorola Vigilant ALPR System

Following completion of the report, Department personnel advised the IPA that Pasadena also operates a separate legacy Motorola Vigilant ALPR system consisting of 11 fixed cameras located in the Rose Bowl corridor. These cameras were not included in the original audit because the review was focused on the Department's Flock Safety program and the Vigilant system operates under a different administrative structure within the Department.

Importantly, Department personnel brought this information forward during their review of the report to ensure that the Commission and public received complete and accurate information regarding the Department's use of ALPR technology. In the interest of transparency, the IPA is issuing this addendum with limited information regarding the legacy Vigilant system.

Department personnel advised that the Motorola Vigilant system is governed by the same Department policies, legal requirements, retention practices, auditing procedures, and information-sharing rules applicable to the Flock Safety system. Users access the system through secure authenticated accounts, data is stored in a cloud-based platform, and records are automatically deleted after 30 days. Department personnel further advised that information sharing through the Vigilant platform is subject to the same legal and policy restrictions governing ALPR data generally. While the Vigilant platform does not include a public transparency portal similar to Flock Safety's, the Department can identify participating agencies with which data is shared.

Vehicle-Mounted ALPR Cameras No Longer in Service

In a July 6, 2026 article, *Pasadena Now* published a stock image depicting an ALPR camera mounted on a PPD police vehicle. However, Department personnel advised the IPA that PPD no longer operates vehicle-mounted Vigilant ALPR cameras. Those systems have been operationally phased out and are no longer in service. The Department's current Vigilant deployment consists solely of fixed cameras located in the Rose Bowl corridor.

The Department is currently engaged in a procurement process to replace its aging Mobile Audio Video (MAV) system. Because newer MAV technologies

may incorporate ALPR capabilities, future vendor selection decisions may affect the Department's ALPR technology platform going forward.

Conclusion

Based on the information provided to the IPA, this supplemental information does not alter the report's findings regarding ALPR governance, retention practices, or compliance safeguards.

Because the Motorola Vigilant system was outside the scope of the original assignment, the IPA did not independently review that platform or data collected by Vigilant cameras as part of the audit. The IPA may elect to examine the Vigilant system in greater depth as part of a future technology-focused review or annual assessment.

Automated License Plate Readers (ALPRs)

462.1 PURPOSE AND SCOPE

The purpose of this policy is to provide guidance for the capture, storage and use of digital data obtained through the use of Automated License Plate Reader (ALPR) technology.

462.2 POLICY

The policy of the Pasadena Police Department is to utilize ALPR technology to capture and store digital license plate data and images while recognizing the established privacy rights of the public.

All data and images gathered by the ALPR are for the official use of this department. Because such data may contain confidential information, it is not open to public review.

462.3 ADMINISTRATION

The ALPR technology, also known as License Plate Recognition (LPR), allows for the automated detection of license plates. It is used by the Pasadena Police Department to convert data associated with vehicle license plates for official law enforcement purposes, including identifying stolen or wanted vehicles, stolen license plates and missing persons. It may also be used to gather information related to active warrants, homeland security, electronic surveillance, suspect interdiction and stolen property recovery.

All installation and maintenance of ALPR equipment, as well as ALPR data retention and access, shall be managed by the Executive Administrator of the Strategic Services Division. The Executive Administrator of the Strategic Services will assign members under his/her command to administer the day-to-day operation of the ALPR equipment and data.

462.3.1 ALPR ADMINISTRATOR

The Executive Administrator of the Strategic Services Division shall be responsible for developing guidelines and procedures to comply with the requirements of Civil Code § 1798.90.5 et seq. This includes, but is not limited to (Civil Code § 1798.90.51; Civil Code § 1798.90.53):

(a) A description of the job title or other designation of the members and independent contractors who are authorized to use or access the ALPR system or to collect ALPR information.

(b) Training requirements for authorized users.

(c) A description of how the ALPR system will be monitored to ensure the security of the information and compliance with applicable privacy laws.

(d) Procedures for system operators to maintain records of access in compliance with Civil Code § 1798.90.52.

(e) The title and name of the current designee in overseeing the ALPR operation.

(f) Working with the City's Department of Information Technology (DoIt) and the Custodian of Records on the retention and destruction of ALPR data.

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(g) Ensuring this policy and related procedures are conspicuously posted on the department's website.

462.4 OPERATIONS

Use of an ALPR is restricted to the purposes outlined below. Department members shall not use, or allow others to use the equipment or database records for any unauthorized purpose (Civil Code § 1798.90.51; Civil Code § 1798.90.53).

(a) An ALPR shall only be used for official law enforcement business.

(b) An ALPR may be used in conjunction with any routine patrol operation or criminal investigation. Reasonable suspicion or probable cause is not required before using an ALPR.

(c) While an ALPR may be used to canvass license plates around any crime scene, particular consideration should be given to using ALPR-equipped cars to canvass areas around homicides, shootings and other major incidents. Partial license plates reported during major crimes should be entered into the ALPR system in an attempt to identify suspect vehicles.

(d) No member of this department shall operate ALPR equipment or access ALPR data without first completing department-approved training.

(e) No ALPR operator may access department, state or federal data unless otherwise authorized to do so.

(f) If practicable, the officer should verify an ALPR response through the California Law Enforcement Telecommunications System (CLETS) before taking enforcement action that is based solely on an ALPR alert.

462.4.1 VOLUNTEER OPERATORS OF ALPR

(a) Selected CAPP Volunteers will be authorized to drive and use an ALPR equipped volunteer vehicle for information gathering purposes only.

1. ALPR certified volunteers will be selected by the Volunteer Coordinator and approved by the Chief of Police or his/her designee.

2. ALPR certified volunteers will be trained regarding the use and procedures associated with driving the vehicle equipped with an ALPR.

3. Volunteers are not to access any information other than the normal scanning operation of the ALPR.

462.5 DATA COLLECTION AND RETENTION

The Executive Administrator of the Strategic Services is responsible for ensuring systems and processes are in place for the proper collection and retention of ALPR data. Data will be transferred from vehicles to the designated storage in accordance with department procedures.

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All ALPR data downloaded to the server should be stored for a minimum of two years in accordance with the City's established records retention schedule. Thereafter, ALPR data will be purged. Any ALPR data related to evidence in a criminal or civil action or data that is subject to a discovery request or other lawful action should be downloaded from the server onto portable media and booked into evidence.

462.6 ACCOUNTABILITY

All data will be closely safeguarded and protected by both procedural and technological means. The Pasadena Police Department will observe the following safeguards regarding access to and use of stored data (Civil Code § 1798.90.51; Civil Code § 1798.90.53):

(a) All ALPR data downloaded to the mobile workstation and in storage shall be accessible only through a login/password-protected system capable of documenting all access of information by name, date and time (Civil Code § 1798.90.52).

(b) Members approved to access ALPR data under these guidelines are permitted to access the data for legitimate law enforcement purposes only, such as when the data relate to a specific criminal investigation or department-related civil or administrative action.

(c) ALPR system audits should be conducted on a regular basis.

For security or data breaches, see the Records Release and Maintenance Policy.

462.7 RELEASING ALPR DATA

The ALPR data may be shared only with other law enforcement or prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law by emailing the internal pd_cau group. Requests must be made utilizing a government recognized email account. Agencies requesting ALPR data shall include the following in thier request:

(a) The agency makes an email request for the ALPR data that includes:

1. The name of the agency.
2. The name of the person requesting.
3. The intended purpose of obtaining the information and case number.

(b) The request should be reviewed by the Technical Services Administrator or the authorized designee and approved before the request is fulfilled.

(c) The approved request is retained on file.

Requests for ALPR data by non-law enforcement or non-prosecutorial agencies will be processed as provided in the Records Maintenance and Release Policy (Civil Code § 1798.90.55).

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462.8 TRAINING

The Training Coordinator should ensure that members receive department-approved training for those authorized to use or access the ALPR system (Civil Code § 1798.90.51; Civil Code § 1798.90.53).

462.9 REFERENCE

See PPD Procedure Manual 462p.

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EXHIBIT IV

Automated License Plate Reader (ALPRs)

462.1 ALPR OPERATION

(a) An ALPR may be used in conjunction with any routine patrol operation or criminal investigation. Reasonable suspicion or probable cause is not required before using an ALPR.

1. Department approved training shall consist of Field Training Officers ensuring each police officer trainee (both new hires and laterals) review the "ALPR Use" guide found in the Manny "Training" file under "@Technology Briefs." This instruction shall be accompanied by a practical application to demonstration knowledge and proficiency by the trainee and overseen by the training officer. Training will be recorded in the probationer's cycle check off list.
2. Officers can utilize the "ALPR Use" guide (W:\Training\@Technology Briefs) for later review as needed.

(b) An officer should verify an ALPR response through CLETS before taking enforcement action that is based solely on an ALPR alert. c. CLETS confirmations of ALPR hits shall be printed out and submitted with an officer's crime report.

462.2 VOLUNTEER OPERATORS OF ALPR

(a) Volunteers utilizing the ALPR will notify dispatch when the ALPR is engaged and when it is shut down.

(b) If the ALPR registers a stolen or wanted vehicle 'hit,' the volunteer will immediately notify dispatch and avoid contact with the vehicle associated with the 'hit' notification.

(c) Volunteers are not to undertake any type of enforcement or surveillance action of any kind in connection with the ALPR "hit".

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