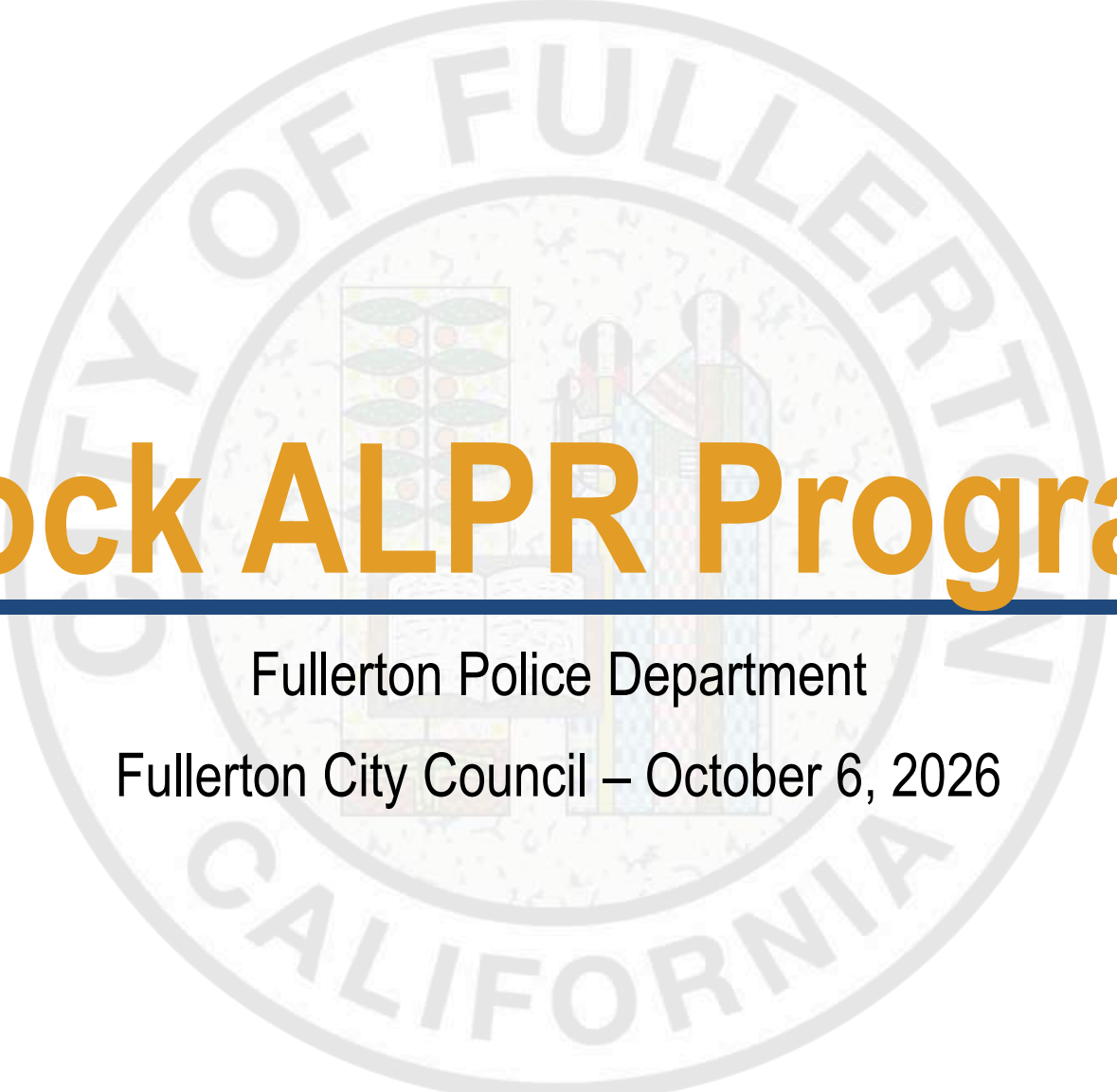




Flock ALPR Program

Fullerton Police Department

Fullerton City Council – October 6, 2026



Fullerton's Flock ALPR Program

17 + 2

CAMERAS

17 fixed cameras plus 2 mobile cameras in our current deployment.

~\$236,000 across equipment, subscriptions, repairs, and maintenance.

5 yrs

OPERATING HISTORY

We installed our first Flock cameras in January 2021.

30 days

RETENTION WINDOW

Our data is automatically and permanently deleted after 30 days unless preserved as evidence.

PROGRAM TIMELINE

There are 135 active FPD users

2007 City Council approval of grant-funded ALPR (UASI)

2019 Vigilant Solutions deployment in Parking Enforcement vehicles as part of the Downtown Paid Parking Program

2021 Flock LPR added under Chief Dunn within purchasing policy guidelines

Now Flock and Vigilant both utilized by FPD



Fullerton PD's ALPR Program

Predated SB 34

In 2021, Fullerton PD added a technology vendor to an ALPR program that was already operating—not a new ALPR program.

2007

ALPR program established

- November 20, 2007 City Council approved a grant-funded ALPR system through UASI.
- Fullerton PD began operating ALPR before SB 34 took effect.

JAN 1, 2016

SB 34 effective

- Fullerton PD's ALPR program was already in place.
- **SB 34's public-comment language applies before implementing an ALPR program; it does not expressly address retroactive re-approval of a pre-2016 program.**

2021

Flock added as technology provider

- Fullerton PD added Flock ALPR
- The department continued its existing ALPR program and public-safety purpose.
- The 2021 action was a vendor addition, not implementation of a new ALPR program.

FULLERTON PD'S POSITION

- *Because our ALPR program was already operating before SB 34 became effective, our 2021 addition of Flock ALPR did not constitute implementation of a new ALPR program.*
- *SB 34 does not expressly require a second public-comment meeting solely because an existing ALPR program changes or adds vendors.*
- *The California DOJ guidance does not create a vendor-change trigger; it explains that SB 34 does not address pre-2016 programs.*

WHAT STILL APPLIES TODAY

- Maintain a written, publicly available ALPR usage-and-privacy policy.
- Maintain reasonable security procedures and access records.
- Govern authorized purposes, users and training, audits, sharing, accuracy, retention, and deletion.

Bottom line: Fullerton PD had ALPR before SB 34. In 2021, we changed technology providers—we did not launch a new ALPR program.



Fullerton PD's ALPR Policy

Fullerton PD Policy 428: Automated License Plate Readers (ALPRs)

428.2 POLICY: The policy of the Fullerton 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 for the official use of this department. Because such data may contain confidential information, it is not open to public review.

FPD Policy 428 is publicly available to view here (Fullerton PD CA Policy Manual): <https://www.cityoffullerton.com/government/departments/police/about-fpd/policies-procedures>

Key Points

- ALPR shall only be used for official law enforcement purposes, in conjunction with any routine patrol operation or criminal investigation.
- ALPR data may be shared only with a California state or local agency as otherwise permitted by law (Civil Code 1798.90.55); out-of-state or federal agencies are prohibited.
- A related case number and reason must be entered prior to using the ALPR search function.
- All authorized users shall complete ALPR training prior to having access to the system.
- ALPR audits will be conducted quarterly by the Crimes Property Sergeant and reviewed by the Support Services Commander.
- 30-day retention period for all ALPR data; system access information shall be retained indefinitely.



Fullerton PD's ALPR Policy

Policy
428

Fullerton Police Department
Policy Manual

Automated License Plate Readers (ALPRs)

428.1 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.

428.2 POLICY

The policy of the Fullerton 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.

428.3 ADMINISTRATION

The ALPR technology, also known as License Plate Recognition (LPR), allows for the automated detection of license plates. It is used by the Fullerton 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. This policy conforms to the provisions of the California Values Act (Government Code 7284) and California Senate Bill 34 (2015) ALPR Rules and Regulations (Civil Code 1798.90.5 - 1798.90.55).

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

428.3.1 ALPR ADMINISTRATOR

The Support Services Division Commander 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.



Fullerton PD's ALPR Policy

Fullerton Police Department Policy Manual

Automated License Plate Readers (ALPRs)

- (f) Working with the Custodian of Records on the retention and destruction of ALPR data.
- (g) Ensuring this policy and related procedures are conspicuously posted on the department's website.

428.4 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) Any member of this department shall enter a related case number and reason prior to using the ALPR search function. If there is no case number available during routine patrol operations or criminal investigations at the time of the search, the designated monthly UNC case number shall be entered.
- (d) 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.

- (e) No member of this department shall operate ALPR equipment or access ALPR data without first completing department-approved training.
- (f) No ALPR operator may access department, state or federal data unless otherwise authorized to do so.
- (g) 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.

428.5 DATA COLLECTION AND RETENTION

The Support Services Division Commander 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.

All ALPR data downloaded to the server should be stored for a minimum of one year and in accordance with the established records retention schedule. Thereafter, ALPR data should be purged unless it has become, or it is reasonable to believe it will become, evidence in a criminal or civil action or is subject to a discovery request or other lawful action to produce records. In those circumstances the applicable data should be downloaded from the server onto portable media and booked into evidence.



Fullerton PD's ALPR Policy

Fullerton Police Department Policy Manual

Automated License Plate Readers (ALPRs)

428.6 ACCOUNTABILITY

All data will be closely safeguarded and protected by both procedural and technological means. The Fullerton 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 shall be conducted quarterly by the Crimes Property Sergeant. All ALPR audits shall be forwarded to the Support Services Commander for review.
- (d) Nothing in this policy shall supersede Fullerton Police Department Policy 415.7, Civil Code 1798.90.51 and Government Code 7824.6 (California Values Act). Members shall not release ALPR data or information to any agency for the purpose of or assistance with immigration enforcement.

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

428.7 RELEASING ALPR DATA

The ALPR data may be shared only with public agencies and only as otherwise permitted by law (Civil Code § 1798.90.55).

For purposes of this section, a public agency is limited to California state or local agencies, including law enforcement agencies, and does not include out-of-state or federal law enforcement agencies (Civil Code § 1798.90.5).

The following procedures are guidelines for ALPR requests:

- (a) The agency makes a written 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.
- (b) The request is reviewed by the Support Services Division Commander 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-California public agencies will be processed as provided in the Records Maintenance and Release Policy (Civil Code § 1798.90.55).



Required ALPR Training

Training

- Prior to access authorization, officers must complete a department-led training on the use of the system and policy.
- At any time, officers can complete additional training through the Flock Academy website. An example of one such training is “Law Enforcement- Search Certification.”



Law Enforcement - Search Certification

Jessi Roman

20% COMPLETE

[View](#)



Required Disclaimer

Every time an authorized user logs into Flock they are required to accept the disclaimer that their use is within the FBI CJIS Security Policy and that unauthorized or improper use may lead to disciplinary action and/or criminal and/or civil penalties.

I am accessing a restricted information system for an authorized use, in compliance with the FBI CJIS Security Policy. I agree to use the system in accordance with the laws of my jurisdiction and will not access data from CA, CO, CT, IL, NJ, NM, OR, VA, VT, WA for immigration enforcement or from CA, CO, CT, HI, IL, MA, MD, ME, NJ, NM, NV, NY, OR, RI, VT, WA, D.C. for reproductive care. I consent to be monitored, recorded, and audited. Unauthorized/improper use may lead to disciplinary action and criminal and/or civil legal penalties. My agency is responsible for the security of my devices and privacy of any data.

Accept and Continue



Legal Precedent for ALPR

Fourth Amendment

A single ALPR observation of a vehicle in public right of ways is materially different from prolonged, comprehensive tracking. (*United States v. Jones*, 565 U.S. 400 (2012))

Court Cases

***United States v. Diaz-Castaneda*, 494 F.3d 1146 (9th Cir. 2007)**: The Ninth Circuit held that officers' computerized check of a license plate did not constitute a Fourth Amendment search. The court reasoned that the plate was displayed publicly and that the computerized inquiry was not sufficiently intrusive to implicate a reasonable expectation of privacy.

- An ALPR system can automate what an officer could otherwise do manually: observe plate → run plate → determine whether vehicle is wanted/stolen.

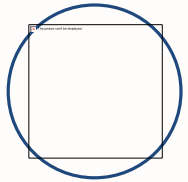
***United States v. Yang*, 958 F.3d 851 (9th Cir. 2020)**: The Ninth Circuit has declined to hold that warrantless ALPR use categorically violates the Fourth Amendment and has upheld an ALPR-related search under the particular circumstances presented.

- ALPR does not equate automatically unconstitutional warrantless tracking.

***ACLU Foundation of Southern California v. Superior Court*, 11 Cal.App.5th 295 (2015)**: Concluded that CRPA law-enforcement exemption applies to ALPR data since ALPR is an established law-enforcement investigative technology.

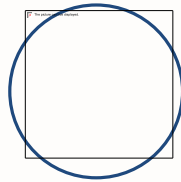


How is Flock's Data Processed?



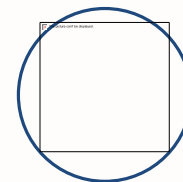
Detect

The camera captures a license plate and vehicle characteristics in public view.



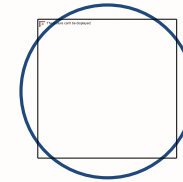
Transmit

The camera transmits the captured data over its network connection using TLS 1.2+ encryption.



Store

Data stored encrypted in Flock's cloud infrastructure hosted on Amazon Web Services (AWS).



Database

Flock's cloud/ machine-learning systems process the imagery and generate searchable vehicle data.

Data is automatically deleted according to the customer's retention period.

Flock uses proprietary machine-learning technology to identify: license plate information, vehicle type, vehicle characteristics, other attributes such as roof racks & bumper stickers



Flock ALPR- Data Security, Storage & Recovery Standards

Overview

Fullerton IT has determined that Flock security protocols incorporate industry-recognized security standards, government compliance frameworks, independent third-party assessments, strong access controls, encryption, audit logging, and geographically redundant backup and recovery capabilities.



Flock ALPR- Data Security, Storage & Recovery Standards

Data Storage & Segregation- CJIS-capable GovCloud Infrastructure

- US-based AWS infrastructure; AWS GovCloud for applicable CJIS workloads.
- Public, multi-tenant GovCloud environment; City/customer data is logically segregated.
- Segregation uses dedicated storage, access controls, network segmentation and encryption safeguards.
- Data, backups and disaster-recovery environments remain in the US.

Access Controls

- Role-based access controls (RBAC) determine camera/network and user privileges.
- Least privilege: users receive no permissions until assigned by an administrator.
- Multi-factor authentication is enforced on all law-enforcement accounts.
- California agency safeguards include automatic disabling of certain national discoverability and filtering controls.



Flock ALPR- Data Security, Storage & Recovery Standards

Backup & Disaster Recovery

- Resources operate across multiple geographically separated AWS availability zones.
- Data replicated across availability zones; separate AWS sites maintain backup copies.
- Automated database backups run daily; restoration/redundancy mechanisms tested annually.
- Encrypted backups are segregated from production.

Audit & Monitoring

- Organization Audit Log: organization-level actions.
- Network Audit Log: camera-network activity and shared access.
- Event Log: logins, downloads, queries and administrative changes.
- SOC 2 Type II: maintained
- ISO 27001: certified
- Independent penetration testing conducted by Bishop Fox in 2026.
- Penetration-test vulnerability/remediation reports and executive summary are available through Flock's security resources.



The Flock ALPR Program in Fullerton Produces Vehicle Leads, **Not Personal Profiles**



WHAT IT DOES

- Captures still photos of license plates and vehicle attributes visible from public roads.
- Compares plates with authorized hotlists to generate investigative leads.



WHAT IT DOES NOT DO

- Capture video.
- Use facial recognition, biometrics, names, DOBs, SSNs, addresses, or DMV identity data.
- Continuously track people, issue traffic citations, or predict who will commit a crime.
- Immigration enforcement, traffic enforcement, harassment or intimidation, usage based solely on a protected class, and personal use are expressly prohibited.



What Our Officers See

Search Alerts FlockOS Devices Evidence

Search Search Lookup

Investigative Purpose

Offense Type *
Enter offense type

Case Number *
Enter case number (required)

Reason *
Enter search reason (required)

Vehicle Details

License Plate
Enter license plate

Plate State
Any

☐ Include Partial Plate

Vehicle Signature
Enter body, make, color, etc

Location & Time

Location
All Network(s) Selected

Map & Devices

Start
09/22/2026 07:00 AM PT

End
09/22/2026 09:00 AM PT

15 Min 2 Hours 24 Hours 48 Hours 30 Days

Advanced Filters

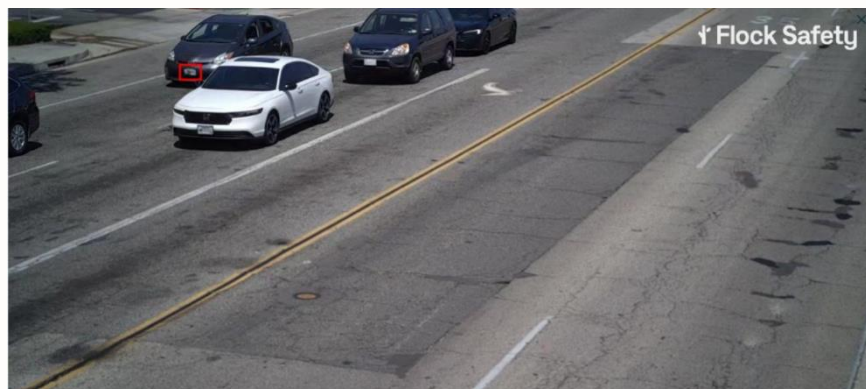
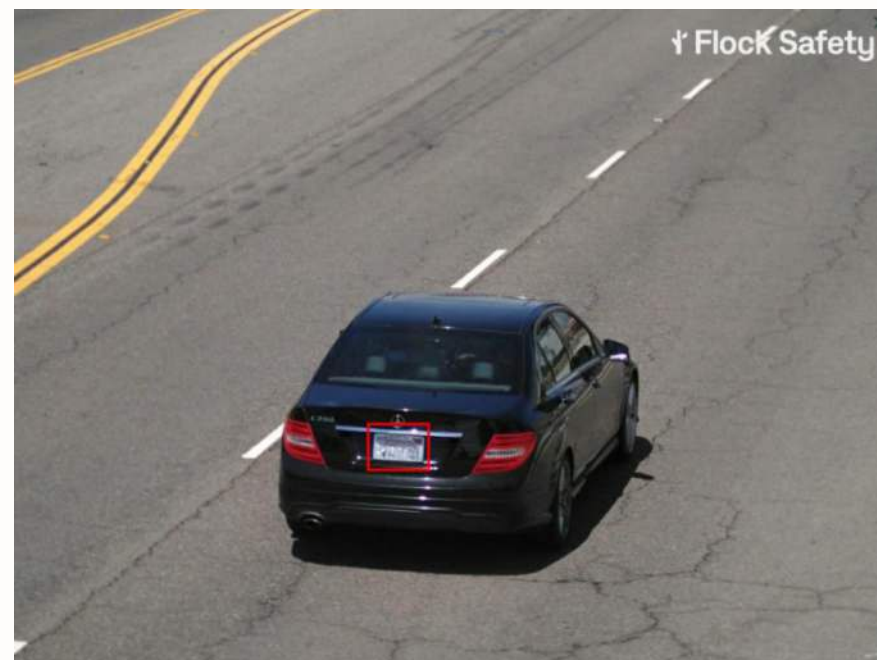
Reset

0

Run Search



What Our Officers See





Fullerton CCTV Security Cameras vs ALPR

CCTV

- Captures video in public right of ways.
- 2-year data retention.
- 432 total cameras:
 - 413 police
 - 19 traffic

FLOCK ALPR

- FPD's Flock Cameras only capture still photos.
- Detects license plates and compares against "hot lists."
- Immediate notification to officers when a plate matches a wanted vehicle.
- Data used to locate vehicles associated with crimes.
- 30-day data retention.
- 19 Cameras



CCTV Cameras Recording View

Not specific to license plate and vehicle characteristics





ALPR Programs

Flock

CAMERAS

Fixed & mobile camera options

DATA

ALPR data processing/analytics occurs in Flock's AWS cloud environment.

NETWORK

Flock network allows customer-to-customer sharing subject to permissions, within CA for FPD.

ALL PRODUCTS

ALPR, Security Camera products, Drone as First Responder program, gunshot detection.

PRICING

\$51,000/year for 19 cameras

Axon

CAMERAS

Fixed & mobile camera options

DATA

Camera performs plate reading/alerting locally and uploads records to Axon Evidence.com cloud.

NETWORK

Axon can integrate multiple ALPR sources through Fusus; working on data sharing among CA agencies.

ALL PRODUCTS

Offers ALPR, body worn cameras, tasers, evidence, records, Fusus, Drone as First Responder program.

PRICING

\$51,278.50/year for 19 cameras

Vigilant

CAMERAS

Fixed & mobile camera options

DATA

Detection data is transmitted to Vigilant/Motorola hosted infrastructure.

NETWORK

Vigilant operates a large multi-source detection data network (all customers' camera data available to search).

ALL PRODUCTS

Law enforcement ALPR and commercial ALPR.



Questions?