

Item #8 March 24, 2026



City Council

Item #8 (RTC 26-273) Informational Report Regarding the Santa Clara Police Department's Automated License Plate Reader (ALPR) Policy, Compliance Review and Program Operations

Cory Morgan, Chief of Police
March 24, 2026

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City of Santa Clara
The Center of What's Possible

Executive Summary

- ALPR Program Review and Compliance Update
- Department evaluation completed
- Program operations confirmed to be aligned with California law

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Why We Are Here

Transparency and Accountability

- Out-of-state data access
- Federal agency access
- Compliance with Senate Bill 34 (SB 34)

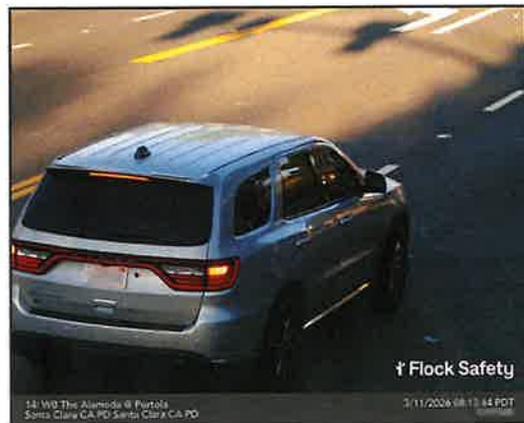
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What ALPR Collects

- License plate number
- Still image of vehicle
- Vehicle make & color
- Date, time & location
- Captured from public roadways
- Does NOT include DMV information, driver identity, or criminal history



Flock Safety

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Santa Clara CA PD Santa Clara CA PD

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Constitutional & Statutory Framework

- No expectation of privacy in license plates on public roads
- Governed by Civil Code §1798.90.5 (SB 34)
- Immigration restrictions governed by SB 54
- Department policy incorporates both

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SCPD ALPR History

2008 – Initial Deployment (PIPS Technology)

- Limited mobile systems on four patrol vehicles
- Small coverage area and limited scans

2016 – Policy & Compliance

- City Council adopted ALPR policy
- Aligned with California privacy law (SB 34)

2019 – Technology Investment

- Council approved funding for investigative technology
- Recognized need to address evolving crime trends

2021 – Modern ALPR Program (Flock)

- Expanded coverage with fixed cameras
- Real-time alerts and regional connectivity

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Public Safety Impact

- Homicide
- Robbery
- Armed carjacking
- Sexual assault investigations
- Mail theft & fraud
- Missing persons
- Stolen vehicle recovery
- Firearm recoveries
- Organized burglary



Bay Area Flock LE Network

- Alameda
- Alameda County
- Albany
- Antioch
- Atherton
- Belmont
- Belvedere
- Benicia
- Berkeley
- Brentwood
- Brisbane
- Burlingame
- **CHP**
- Calistoga
- **Campbell**
- Clayton
- Cloverdale
- Colma
- Concord
- Contra Costa County
- Cotati
- Daly City
- Danville
- Dublin
- East Bay Parks
- East Palo Alto
- El Cerrito
- Emeryville
- Fairfield
- Foster City
- Fremont
- **Gilroy**
- Half Moon Bay
- Hayward
- Healdsburg
- Hercules
- Hillsborough
- Livermore
- **Los Altos**
- **Los Gatos**
- Marin County
- Menlo Park
- Mill Valley
- **Milpitas**
- Moraga
- **Morgan Hill**
- Napa
- Napa County
- **NCRIC**
- Newark
- Novato
- Oakland
- Oakley
- Pacifica
- **Palo Alto**
- Petaluma
- Piedmont
- Pleasant Hill
- Pleasanton
- Redwood City
- Richmond
- Rio Vista
- Rohnert Park
- San Bruno
- San Francisco
- **San Jose**
- San Leandro
- San Mateo
- San Mateo County
- San Pablo
- San Rafael
- San Ramon
- **Santa Clara**
- Santa Rosa
- Sausalito
- Sonoma County
- South San Francisco
- St. Helena
- **Sunnyvale**
- Tiburon
- Union City
- UC Berkeley
- Vacaville
- Vallejo
- Walnut Creek
- **Foothill-DeAnza College**
- **West Valley Mission College**



Policy & Oversight Framework

Governance & Transparency

- Policy updated (Nov 2021) and publicly posted
- Written request required for data release

Access Control & Accountability

- Division Commander approval required
- Monthly audit required (Policy 428.6)

Legal Compliance

- Immigration-related data sharing prohibited

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How ALPR Is Used

Training & Authorized Use

- Initial training required prior to access
- Legitimate law enforcement purpose required for all searches
- Refresher training every ~2 years

Access & Accountability

- Individual user credentials required
- All activity logged and subject to audit

System use is limited to authorized purposes, trained personnel, and audited activity

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How ALPR Is Used

Primarily Passive, Automated Alerts

- Cameras scan plates and compare to state and local hot lists
- Alerts generated for stolen vehicles and stolen plates
- 26,000+ alerts generated by Santa Clara ALPR cameras in 2025

Controlled Investigative Use

- Custom hot list entries require documented law enforcement purpose
- Supervisor approval required

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How ALPR Is Used – Investigative Searches

Controlled Investigative Use

- Searches require documented law enforcement purpose
- Case number and crime type required

Search Types

- Specific lookup (license plate)
- Filtered search (vehicle description, date, location)

Search Scope & Tools

- Searches can be limited by region and timeframe
- Advanced tools (Convoy, Geo-Locate) support investigations
- All use is logged and subject to audit

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Evolving Criminal Tactics

Shift in tactics to avoid detection

- Cold plating – using a stolen license plate to conceal identity
- Altering plate – tape, scratches, bending, dirt placement or swapping characters (e.g., turning an “E” into an “F”)
- Vehicle switching – frequent changes and use of rental vehicles

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ALPR Retention

Default Retention (Vendor – Flock)

- Data automatically deleted after 30 days
- Over 99% of data is never retained

Evidence Retention (Department Policy 428.5)

- Data downloaded for investigations retained minimum of one year
- Aligned with the Department retention schedule

Audit Logs

- Retained for a minimum of one year
- Do not contain ALPR data
- Record search activity only

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Understanding Audit Logs

- “Search Event” ≠ Data Access or Sharing
- “Total Networks Searched” ≠ Records Retrieved
- Logs do NOT show how many results were returned
- Logs do NOT indicate data export or download

Audit logs reflect search activity, not data access or sharing

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Flock Transparency Portal

Public Transparency

- Public portal provides information on SCPD ALPR system
- Displays organizations authorized for access

Public Audit Access

- Public search audit log available
- Displays last 30 days of system activity

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Historical Platform Configuration

- Earlier platform settings allowed multi-network searches
- Included out-of-state agencies
- Internal audit confirmed there were 114,497 searches conducted by six non-CA agencies between 2024 & 2025.
 - only 2 searches were conducted specifically for SCPD Flock network alone.

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Vendor Guardrail Updates (2025)

- **March:** National Lookup disabled
- **June:** Out-of-state sharing blocked
- **July:** Prohibited search filters implemented
 - Immigration-related searches blocked
 - Reproductive healthcare searches blocked
- **August:** Federal agencies removed from lookup networks

California data cannot be shared with out-of-state or federal agencies

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SCPD Review – September 2025

- Comprehensive review of sharing settings
- Confirmed no active out-of-state sharing
- Verified California-only data sharing configuration
- Ongoing monitoring and periodic verification

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ALPR in Action: Real Cases

Districts 1 & 2 – Firearm Possession | Stolen Weapons

ALPR alert → high-risk stop

- ✓ Stolen firearm recovered
- ✓ Additional rifles seized (AK-47 & AR-15)

Districts 1, 2, & 4 – Bank Juggling Crew

ALPR alerts linked suspects across jurisdictions

- ✓ 8 suspects identified
- ✓ 160+ felony charges
- ✓ Multi-jurisdiction investigation

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ALPR in Action: Real Cases

Districts 2 & 4 – Organized Commercial Burglaries

ALPR alerts linked crime scenes across multiple cities

- ✓ Search warrants served
- ✓ 8 suspects arrested
- ✓ Multi-agency investigation

District 3 – Armed Robbery Spree

ALPR identified suspect vehicle → linked cases across jurisdictions

- ✓ 5 suspects arrested
- ✓ Multi-agency coordination

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ALPR in Action: Real Cases

District 4 – Assault with Deadly Weapon | Road Rage

Vehicle description + nearby camera → custom hot list → same-day alert

- ✓ Suspect identified and arrested
- ✓ Admitted involvement

District 5 – Child Sexual Assault Multi-Victim Case

ALPR revealed suspect travel patterns to Santa Clara near assaults

- ✓ Critical evidence developed
- ✓ Multiple victims identified
- ✓ Suspect arrested on felony charges

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ALPR in Action: Real Cases

Districts 5 & 6 – Armed Carjacking Suspect | Multi-Agency Response

ALPR alert for suspect vehicle → pursuit → suspects located

- ✓ Cross jurisdiction coordination (SJPD/SCPD)
- ✓ Armed suspects taken into custody

District 6 – Armed Carjacking | Out-of-State Homicide Link

ALPR alert for stolen vehicle → suspects located

- ✓ Linked to out-of-state homicide
- ✓ Search warrants served
- ✓ All suspect in custody

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Context: Other Municipal LPR Uses

- Parking enforcement vehicles commonly use LPR for permit verification and compliance
- Residential parking programs rely on license plate databases
- Parking garages use LPR for automated entry and billing
- These systems often contain resident permit and payment data

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How ALPR Compares to Other Plate-Based Systems

Police Investigative ALPR

- Plate image & vehicle image
- Date/time/location
- ~30-day retention
- Not linked to personal identity

Residential Parking Systems

- Plate linked to resident permits
- Address or permit data

Toll Systems

- Plate linked to billing accounts
- Payment & account date

Private Parking Systems

- Plate linked to payment records

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Oversight Is Continuous

- May 2016 – ALPR policy adopted
- Mar – Aug 2025 – vendor guardrails implemented
- Sept 2025 – configuration review conducted
- Annual audit required
- Monthly logs reviewed

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Where We Stand Today

- Historical configuration reviewed & addressed
- No out-of-state sharing
- No federal lookup access
- Immigration-related use prohibited
- Structural safeguards and oversight in place
- ALPR remains a critical public safety tool



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