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Los Altos, California 94022-3087

MEMORANDUM

DATE: Thursday, November 7, 2024
TO: Chief Saskia Lagergren
FROM: Captain Joe Ledoux
SUBJECT: FLOCK CAMERA BI-ANNUAL AUDIT

SUMMARY:

On October 9th, 2024, Sergeant Eric Brooks conducted the required audit of the first six months of Flock ALPR cameras pursuant to policy 462.7(f). The audit was conducted using an approved methodology that ensures full compliance with the policy requirements while also using acceptable auditing guidelines.

In summary, the audit's findings concluded that all of the randomly selected searches were non-compliant with the prescribed policy provisions, precisely 462.7(e). The reasoning for non-compliant searches was that the policy sought both a case or incident number **and** the reason. All the random inquiries complied with the policy by providing either a case/incident **or** a reason. Sgt. Brooks provided a memorandum with the results from his randomizer, including un-sanitized data, including the license plates, Officer names, and times of each search.

I have provided an email to the entire organization reminding everyone that policy 462 requires both a case or incident number and the reason.

RECOMMENDATION:

Although the audit revealed that all of the randomly audited search inquiries were non-compliant, I believe that this was primarily driven by confusion about the requirements. Sgt. Brooks indicated that all of the reasons for accessing Flock search databases were permissible; they didn't document the coupling portion pursuant to 462.7(e). Each randomly audited search had either the case/incident number or the reason. This justification is consistent with nearly all other law enforcement databases.

Policy 462 explicitly states in subsection 462.7(e), "Every ALPR browsing inquiry must be documented by either the associated Los Altos Police Department **case number or incident number and the reason** for the inquiry." I have sent out a reminder email explicitly indicating the necessity of coupling both the case/incident number and the reason for the inquiry. I have also attended briefings where I have reiterated the need for full compliance. Lastly, I have asked Sergeant Aimee Major, our newly appointed program coordinator, to closely monitor in the following months to ensure full compliance.

I will ensure that we are fully compliant with the stipulations as outlined in the policy, within the following months.

Respectfully submitted,

Captain Joe Ledoux