

Request to supplement unified CPRA production and clarify unresolved items

Draft follow-up based on gaps identified in the actual production

Hello Undersheriff Benov,

Thank you for the unified response and records production concerning my three outstanding CPRA requests. I reviewed the files actually produced, including the EML messages, attachments, CSV reports, grant and payment records, and historical Vigilant records.

Several request items remain unanswered or only partially answered. This message is intended to identify the specific gaps and allow the Sheriff's Office to supplement the production without repeating records already provided.

1. Vendor research and selection - request items 28 through 36

The production contains extensive communications and materials from Flock Safety, historical Vigilant purchase orders, and an October 2023 Vigilant LEARN subscription quote. I did not locate records showing an actual comparison of Flock with another ALPR camera vendor, including competing-vendor communications, camera proposals, demonstrations, evaluation criteria, comparison charts, scoring, privacy or civil-liberties analysis, accuracy or reliability analysis, data-retention or sharing comparisons, a recommendation memorandum, or an agency-authored explanation of why Flock was selected.

Please identify the second company or other ALPR vendors the Sheriff's Office previously stated it researched and provide all responsive records. If no such comparison or evaluation records exist, please state that clearly and describe the offices, custodians, email accounts, systems, and search terms used to reach that conclusion. Please also provide all communications and attachments with Vigilant Solutions, Motorola Solutions, or any other ALPR vendor from January 1, 2023 through March 31, 2025. The Vigilant quote and purchase records do not include the communications that accompanied them.

2. 2023-2024 Flock access and searches - request items 1 through 4 and 31

The produced records show that a Flock MOU was signed in July 2023, that Flock created the ACSO organization and administrator accounts in August 2023, that ACSO was operating under a free plan in September 2023, and that searches began in August 2023. They also show that Flock announced a change to the Community Tier effective April 1, 2024, while ACSO search totals continued throughout 2024.

Please provide:

- The mutually signed July 2023 MOU and every agreement, term, policy, or account-tier document governing the 2023-2024 access;
- Records showing which accounts existed, when each account was created or disabled, the roles and permissions assigned, and the networks or cameras assigned to those roles;
- Records showing which sharing invitations were accepted, active, rejected, revoked, or merely pending;
- Training and certification completion records referenced in the emails;

- Records explaining what data and cameras ACSO could search before April 1, 2024 and after the announced Community Tier change;
- Records showing whether ACSO paid for access, received sponsored or partner access, or accessed Flock through another agency during 2023 or 2024; and
- Communications or reports to the Sheriff, County Administration, County Counsel, purchasing staff, or the Board of Supervisors concerning this pre-contract activity.

3. Retention-policy conflict - request items 26 and 27

The February 19, 2025 email chain shows that Captain Martin recognized the conflict between Flock's 30-day retention and the Sheriff's Office policy stating that ALPR data downloaded to the server should be stored for a minimum of one year. Flock responded that one-year cloud retention was available for an additional cost. I did not locate a record showing how the conflict was resolved or what "the server" means.

Please provide records identifying:

- What "the server" means in Policy 473.5;
- Whether ACSO downloads, exports, flags, synchronizes, archives, or locally stores ALPR images or metadata;
- The retention period and storage location for captured images, vehicle/plate metadata, searches, alerts, hotlists, audit logs, flagged records, downloads, exports, and case evidence;
- Any policy draft, revision, approval, procedure, training, or implementation guidance created after the February 2025 discussion; and
- Whether Policy 473.5 was amended, deemed inapplicable, or is being applied to downloaded or locally stored data.

4. Sharing, access, and actual use - request items 5, 6, 11, 12, 13, 21, and 22

The outgoing sharing CSV lists organizations but does not include dates, status, or permission types. The incoming network CSV includes California and out-of-state organizations and network names associated with LPR, Condor, Raven, PTZ, and VMS products. A separate email shows that sharing requests may include Search, Hot List, VMS Go-Live, VMS Historical, and VMS Download permissions.

Please provide an export or records showing, for each incoming and outgoing share:

- The request/invitation date, acceptance date, activation date, revocation date, and current status;
- Whether the share was pending, accepted, active, denied, expired, or revoked;
- The exact network, product, permission and role assigned;
- Whether users could search, receive alerts, view live video, view historical video, download video, or access audio detections;
- The agencies or users that actually accessed, searched, or received alerts from ACSO data, with all reasonably segregable non-investigatory fields; and
- Any direct or indirect federal, task-force, fusion-center, contractor, or joint-account access, including any access involving NCRIC.

For any access-log fields withheld under Government Code section 7923.600(a), please identify the record category and fields withheld and release all reasonably segregable administrative information, such as date, agency, user or account type, action type, role, and system accessed, where disclosure would not reveal investigative facts.

5. Missing attachments and referenced records

Please supplement the following records referenced in produced emails but not included as files:

- The mutually signed July 2023 MOU;
- The August 2023 camera-location and map views and the quote generated from that deployment;
- The Board letter or resolution attached to the February 19, 2025 email;
- The FAQs and Privacy Commitment materials referenced for the Board packet;
- The project or proposal attachment referenced in the January 14, 2025 "Re: The New Guy!" thread;
- Training resources, recordings, manuals, or presentations referenced only by external links; and
- Any other attachment that the Sheriff's Office intended to produce but that was omitted from the EML export.

6. Camera installation and operational status - request item 7

The contract and deployment records refer to ten cameras, while the installation CSV contains eight dated entries. Please provide a complete ten-device inventory showing device or serial number, location, installation date, activation date, current operational status, any downtime, and any relocation or replacement history.

7. Grant and funding records - request items 8 and 9

The production identifies several funding sources and amounts but does not appear to include the complete application, award, agreement, reimbursement, approval, accounting, and correspondence file for each source. Please provide the complete records for the Homeland Security, Byrne SCIP, PG&E, EBMUD, minor-equipment, and any other funding used for the project, together with a reconciliation showing how those sources paid the first-year and recurring Flock costs.

8. Policy drafts, audits, and compliance records - request items 13 through 15

Please provide the September 2023 ALPR policy draft, prior versions, version history, approval or adoption records, and implementation memoranda. Please also clarify separately whether any ALPR misuse investigation, disciplinary investigation, corrective action, compliance review, or policy review exists. If a responsive record exists but is withheld as a personnel record, please identify the category and release all reasonably segregable non-personnel and non-identifying portions. If no responsive record exists, please state that for each category rather than stating what would be exempt if it existed.

9. Production and withholding index

For categories claimed to have no responsive records or withheld in whole or part, please identify the custodians and systems searched and provide a record-category index stating the basis for each withholding. Where the response refers to "previously supplied records," please identify those records by filename, date, and the request item they answer.

Please provide the supplemental records electronically and on a rolling basis. This request does not seek duplicate copies of records already produced unless needed to supply a missing

attachment, a complete email chain, or identifying metadata.

Thank you,

Brandon Revering