

ACSO Unified CPRA Response - Complete Records Review

Amador Transparency Project | Production received July 28, 2026 | Review package v1.0

Review scope. This review independently examined all 167 top-level files in the Sheriff's ZIP: 146 EML messages, 14 PDFs and 7 CSVs. Every EML parsed successfully, all 41 embedded attachments were extracted, all top-level PDFs rendered successfully, and all CSVs opened. The Sheriff's narrative response was treated as a claim to be tested against the files, not as proof that an item was answered.

Executive assessment

Only request item 10 is fully answered in the form requested. The remaining 36 items are partial, unresolved, unanswered, or subject to a "no records" claim that cannot be independently verified from the production.

The most important deficiency is the vendor-selection response. The production shows sustained Flock sales engagement and historical Vigilant subscriptions, but no documented competitive evaluation. No competing-vendor email chain, competing camera proposal, comparison chart, scoring sheet, evaluation criteria, independent privacy/civil-liberties analysis, reliability comparison, or agency-authored selection memorandum was produced.

The records also establish that ACSO personnel had Flock accounts and performed searches beginning in August 2023, well before the February 25, 2025 Board item and before County cameras began installation in May 2025. The MOU, free-plan terms, post-April 2024 account basis, accessible networks, and notice to County leadership remain incomplete.

The 30-day versus one-year retention conflict remains unresolved. A February 2025 email shows ACSO recognized the conflict before Board approval and was told that one-year Flock cloud retention would cost extra. No produced record shows a policy revision, implementation decision, or definition of the "server" referenced in Policy 473.5.

Production statistics

Measure	Result
Top-level files	167
EML messages	146
Top-level PDFs	14
Top-level CSVs	7
Extracted EML attachments	41 (15 ICS, 15 PNG, 9 PDF, 2 DOCX)

Parse/render failures	None identified
Exact duplicate EML files	None identified
Same-body email group	One group; see duplicate analysis index

Significant findings

1. The claimed competitor research is not documented

Confirmed facts: Flock supplied proposals, a draft contract, deployment maps/links, pricing, a vendor-authored sole-source letter, product literature and extensive communications. Historical Vigilant purchase orders and an October 2023 Vigilant LEARN renewal quote were produced.

Reasonable inference: ACSO knew of and used a Vigilant investigative-data product while separately pursuing Flock. That does not establish that ACSO compared two camera vendors or performed “extensive research.”

Unresolved: No record identifies the claimed second company or shows evaluation criteria, comparison, recommendation, privacy analysis, accuracy analysis, retention comparison, data-sharing comparison, procurement scoring, or the rationale for selecting Flock.

2. ACSO used Flock before formal County camera approval

Confirmed facts: The MOU was signed in July 2023; the Flock organization and administrator accounts were created in August 2023; users were added; ACSO described itself as using a free plan; and monthly searches began in August 2023. County cameras were not approved until February 25, 2025 and the first listed installation was May 23, 2025.

Unresolved: The signed MOU is missing. The production does not identify every accepted shared network, what users could access, the legal/account basis after Flock changed free access in April 2024, or whether the Sheriff, County Administration, County Counsel or Board was informed.

3. The retention conflict was known before approval and remains unresolved

Captain Martin wrote that he believed retention was 30 days but the policy said one year and asked for clarification so he could make necessary changes. Flock replied that default data deletes after 30 days and one-year retention could be purchased. No record shows the resulting policy change, implementation choice, local storage practice, or category-by-category retention schedule.

4. Sharing reports do not establish actual access or use

The outgoing report lists 224 organizations and the incoming report lists 187 organizations. The incoming list includes at least 30 clearly out-of-state organizations and network names associated with LPR, Condor, Raven, PTZ and VMS. The reports omit grant/acceptance dates, current status, exact permissions, role assignments and actual-use logs. Invitation, configured share, role access and actual search are distinct events and should not be conflated.

5. Product expansion: distinguish marketing from demonstrated interest

Flock broadly marketed Nova, Condor, Raven, live video, VMS, PTZ, audio/gunshot detection and other products. Most of those messages are generic or targeted marketing and do not prove ACSO intended to buy them. One substantive February 2025 exchange does show ACSO asked about LensLock integration and in-car LPR capability and projected cost. Incoming network names also indicate potential access to non-LPR products shared by other jurisdictions, but the production does not identify actual user permissions.

6. Funding records are fragmented

Produced records identify FY21 Homeland Security funds, Byrne SCIP, PG&E/minor-equipment funds, tax payments and possible EBMUD LPR service funding. They do not provide a complete application-to-payment file or a clear reconciliation of every source to the first-year and recurring contract costs.

7. Withholding and “no records” responses require clarification

The response uses general exemptions for investigative, personnel and statutorily restricted ALPR information. It does not provide a category-level withholding index, identify segregable fields, explain searches for “no records” categories, or identify records referenced as “previously supplied.” Item 15 is especially unclear because it states what would be exempt “if” records existed rather than stating whether each category exists.

Chronological timeline

Date	Event	Type	What it establishes	Source
2020-11-16	Vigilant Solutions purchase order	Historical ALPR/data service	ACSO had a paid Vigilant investigative-data subscription years before the Flock camera contract.	PO 21202 Vigilant Solutions SO 11.16.20.pdf
2021-2023	Vigilant subscription renewals	Historical ALPR/data service	The Vigilant subscription continued across multiple fiscal years.	Vigilant PO 22188.pdf; Vigilant PO 23222.pdf; Vigilant Claim.pdf
2023-06-12	Flock sales outreach begins after referral involving Sheriff Redman	Vendor outreach	Flock initiated substantive contact and proposed a discussion/demo.	Re: Flock ALPR - referred by Sheriff Redman.eml (quoted chain)
2023-07-06	Flock platform introduction/demo meeting scheduled	Meeting/demo	ACSO and Flock scheduled a product introduction and demonstration.	Fwd: Invitation: Amador Co SO x Flock - intro and demo of platform.eml
2023-07-18	Captain Benov and Flock sales representative confer	Sales call	ACSO sought mapping/location and contract discussions.	Invitation: Capt Benov call Caroline.eml; follow-up chain

2023-07-20 to 2023-07-24	Flock MOU sent, signed, and mutually completed	Access agreement	The MOU was intended to grant Flock-system access, permit requests for other agencies' cameras, and enable searches. The signed MOU file itself was not produced.	Re: Amador Co SO and Flock Safety - MOU access next steps.eml; Aug. 31 forwarded chain
2023-08-08	Mapping strategy call scheduled	Planning/mapping	Camera siting and deployment planning occurred before Board approval.	Invitation: Amador Co SO x Flock Safety - mapping strategy call.eml
2023-08-16	Flock organization and first ACSO administrator accounts created	Account creation	Flock created the ACSO organization and administrator accounts for Jarret Benov and Jeremy Martin.	Audit 2023 to Feb 2025.csv; account-setup/sharing email chain
2023-08-16	Galt PD access confirmed during setup	Shared-camera access	A Flock representative stated Galt PD had granted ACSO access, supporting immediate use of another agency's network.	Account/setup email chain
2023-08-17 onward	Multiple agencies send camera-sharing invitations	Agency sharing	ACSO was invited to access networks in California and other states. Invitations do not alone prove role assignment or actual access.	Cal-Fire, Akron, Adrian, Mahoning, Clearwater, Baldwin County, Orange County, Roseville and other sharing EMLs
2023-08-31	Flock supplies deployment maps, cost quote, and draft legal agreement	Procurement/planning	Flock and ACSO were planning a 16-camera deployment and discussing County counsel review well before the 2025 Board item. The linked maps and generated quote were not preserved in the production.	Fwd: Amador Co x Flock Safety - follow up information.eml and attached draft agreement
2023-08 to 2023-12	ACSO conducts 219 Flock searches	Operational use	Searches were performed more than a year before the County camera contract.	Searches by month 2023 to June 2026.csv
2023-09-25	ACSO describes itself as operating under Flock's free plan	Free-tier use/training	Personnel were told to use the system, complete training/certification, and document case/reason information while on a free plan.	Flock Access.eml
2023-10-10	Vigilant issues renewal quote for LEARN investigative-data platform	Alternative/current vendor record	A Vigilant subscription renewal was priced at \$8,715. The record does not compare Vigilant with Flock.	LMP-2214-01.pdf

2023-2024	Many ACSO user accounts are created and administered	User access	Dozens of ACSO personnel accounts and role/admin events existed before County camera approval.	Audit 2023 to Feb 2025.csv
2024-01-16	Flock announces end of broad free access effective April 1, 2024	Account-tier change	ACSO was told it would move to Community Tier, with broad public/state/national and direct LE sharing reserved for paying customers.	Upcoming changes to your Agency's Flock Access.eml
2024-01 to 2024-12	ACSO conducts 1,527 Flock searches	Operational use	Search activity continued throughout 2024, but the production does not identify the governing account tier or data scope after April 1.	Searches by month 2023 to June 2026.csv
2024-09-10 to 2024-09-23	PG&E provides \$10,000 charitable contribution for LPR project	Funding	PG&E funding was directed toward the LPR project.	R-112389 County of Amador PGE.pdf
2025-01-09 to 2025-01-29	ACSO and Flock restart budget/quote/contract activity	Procurement	ACSO assembled funding from multiple sources and advanced a ten-camera Phase 1 purchase. Flock supplied a vendor-authored sole-source letter.	Re: Flock Safety - reconnect.eml; Flock Safety Phase 1 Quote.eml; Flock Safety Next Steps.eml
2025-02-19	ACSO identifies conflict between 30-day retention and one-year policy	Policy/retention	Captain Martin explicitly asked for clarification so he could make necessary changes; Flock said one-year retention costs extra and default data deletes after 30 days.	Re: Follow-Up.eml chain
2025-02-19	ACSO asks about LensLock partnership and in-car LPR capability/cost	Product expansion interest	This is affirmative ACSO interest in mobile/in-car LPR, distinct from generic vendor marketing.	Re: Follow-Up.eml chain
2025-02-24	Deployment plan approval/document routing occurs	Implementation/procurement	Implementation was being finalized immediately before the Board item.	Re: Deployment Plan Approval.eml and attached draft agreement
2025-02-25	Board of Supervisors approves Flock project	Formal approval	The County's own ten-camera project moved forward on the consent agenda.	Board-related email chain; contract/procurement records
2025-03-12	Flock reports pending camera-share requests and permission categories	Sharing configuration	Share requests could include Search, Hot List, VMS live, VMS historical, and VMS download permissions; pending status is distinct from active access.	Action Requested: Pending Flock Camera Share Requests.eml

2025-03 to 2025-04	Kickoff/deployment meetings occur	Implementation	Flock and ACSO began implementation after approval.	Kickoff calendar EMLs and follow-up messages
2025-05-14	Deployment digest shows 0 of 10 cameras live	Installation	No County cameras were live at this point despite pre-existing Flock search activity.	Upcoming Deployment Activity emails
2025-05-23	First installation date listed at Ridge/Highway 88	Installation	The first listed County camera install occurred in late May 2025.	Camera Install Sheet.csv
2025-07-09	Deployment digest reports 3 cameras live	Installation	County camera activation was progressing in stages.	Upcoming Deployment Activity email
2025-07 to 2025-08	Admin/user training and recorded training resources distributed	Training	ACSO conducted formal implementation training after installations began.	FLOCK Admin User Training.eml; 8/13 Flock Admin Training.eml
2025-08-28	Deployment digest reports 5 cameras live	Installation	Half of the contracted devices were live.	Upcoming Deployment Activity email
2025-09 to 2025-12	Additional cameras installed; 8 installed/live by late 2025	Installation	The production identifies eight install entries; two of ten contracted devices remain insufficiently documented in the install sheet.	Camera Install Sheet.csv; deployment emails
2026-03-03	ACSO requests San Rafael ALPR data access	Sharing/access	ACSO sought another agency's ALPR data under that agency's terms.	ALPR acknowledgement record referenced in prior production; not in current ZIP
2026-06	Sharing reports generated	Sharing/access	The reports list 224 outgoing organizations and 187 incoming organizations, but omit dates, status, permissions, and actual-use details.	Agencies Allowed Access to ACSO Data.csv; Networks Shared With ACSO.csv
2026-07-06	Fiscal staff summarizes Flock/Vigilant funding records	Funding/accounting	The email identifies Homeland Security, SCIP, PG&E/minor-equipment, and tax payment amounts and attaches historical Vigilant/Flock payment records.	Flock & Vigilant.eml and attachments

Complete 37-item response matrix

#	Request	Sheriff response	Responsive records	What the records establish	Status	Missing	Issue and follow-up
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1	Pre-Feb. 25, 2025 access, use, training, certification, subscriptions, participation, and related records.	See attached responsive records.	2023 MOU-access email chain; Aug. 2023 account/setup and sharing emails; Audit 2023-Feb 2025.csv; Flock Access email; monthly search totals; training-related emails.	ACSO signed an MOU in July 2023, received a Flock organization and administrator accounts in August 2023, added many users, trained/certified personnel, and conducted searches beginning August 2023.	Partially answered	Signed MOU; complete account entitlement/history; training certificates; user-role history; terms applicable after April 1, 2024; complete search/audit records; any invoices or agreements for 2023-24 access.	Issue: The records establish substantial pre-approval activity, but the production does not explain its full legal/contractual basis or scope. Follow-up: Produce the signed MOU, account/role/export records, certifications, and the complete terms governing 2023-24 access.
2	Source of pre-Feb. 25, 2025 access, including agreements, sponsorships, pilots, partnerships, or another-agency access.	See attached responsive records.	July 2023 MOU chain; Aug. 2023 Galt access/setup email; camera-sharing invitations; Sept. 2023 free-plan email; Jan. 2024 Community Tier notice.	Initial access came through a Flock MOU/free-plan arrangement and requests/shares from other organizations; Galt granted access.	Partially answered	The actual MOU; exact free-plan or Community Tier terms; list of networks actually accepted and accessible; any sponsoring/partner agreement; basis for continued searches after April 1, 2024.	Issue: Invitations are not proof of accepted access, and the production does not reconcile continued search activity with the announced free-access change. Follow-up: Identify each access source, date, account tier, accepted network, and governing agreement.
3	Records explaining 2023-24 Flock use and how access existed before the March 2025 service agreement.	See previously supplied and attached records.	Same records as items 1-2; monthly searches; administrative audit.	The records show operational searches, user administration, training, and interagency network access before the County camera contract.	Partially answered	A coherent explanation of the free/MOU/Community Tier lifecycle; what data/cameras were searchable; Board/County Administration notice; all prior records specifically identified.	Issue: The response relies on "previously supplied" records without identifying them and does not explain the 2024 access model. Follow-up: Provide a written record index and all agreements/terms explaining the 2023-24 access.
4	All ACSO-Flock communications and attachments from Jan. 1, 2023 to present.	See attached responsive records.	146 EMLs, extracted attachments, calendar records, marketing, deployment and training emails.	A large body of communications was produced, ranging from substantive sales/implementation threads to automated marketing and system notices.	Partially answered / completeness unclear	Referenced but absent attachments, including signed MOU, Board packet/resolution, deployment maps, some project/proposal and training materials; search methodology and custodians.	Issue: Several email bodies refer to attachments or links that were not included as files. Follow-up: Supplement missing attachments and identify custodians, search terms, date completed, and any excluded systems/accounts.

5	Every agency authorized to access ACSO ALPR data, date granted, and access type.	See attached records; report does not produce date; agencies may view captured still images.	Agencies Allowed Access to ACSO Data - June 2026.csv; pending-share email.	The report lists 224 organizations receiving ACSO network sharing. A separate pending-request email shows possible permission types such as Search, Hot List, VMS live/historical/download.	Partially answered	Grant dates; active vs pending/invited/revoked status; exact permission type; users/roles; alert access; audit of actual use.	Issue: The stated "view captured still images" description is not documented in the CSV and is less detailed than the permission types shown elsewhere. Follow-up: Export the full sharing configuration with dates, status, permissions, and revocations.
6	Every agency or organization whose ALPR data ACSO personnel may access.	See attached responsive records.	Networks Shared With ACSO.csv; sharing invitation emails.	The report lists 187 organizations sharing networks with ACSO, including at least 30 clearly out-of-state organizations and multiple network/product types.	Partially answered	Acceptance/activation date; active vs offered/pending status; role assignment; exact search/alert/video privileges; revocations; actual use.	Issue: A sharing invitation alone does not establish access, while network-list inclusion still does not prove a particular user had role access. Follow-up: Produce accepted/active share exports and role/network assignment history.
7	Installation date, activation date, and operational status of each current camera location.	See attached responsive records.	Camera Install Sheet.csv; deployment digest emails; Caltrans/permitting records.	Eight dated install entries are listed; deployment digests show gradual activation from 0 live in May 2025 to 8 installed/live by late 2025, with two still pending at points.	Partially answered	Two of ten contracted cameras/locations; distinct activation dates; serial/device IDs; current live/offline status; relocation history.	Issue: The install sheet has only eight rows for a ten-camera contract and conflates repeated locations without device IDs. Follow-up: Provide a ten-device inventory with location, install, activation, current status, and relocation history.
8	All grant/funding applications, awards, agreements, reimbursements, reports, correspondence, and related ALPR funding records.	See attached responsive records.	BYRNE SCIP worksheet; OES HSGP docs; PG&E record; Flock claim; EBMUD records; July 2026 funding email.	The production identifies Homeland Security, Byrne SCIP, PG&E/minor-equipment, and possible EBMUD funding/payment context.	Partially answered	Complete applications, award letters, grant agreements, approvals, reimbursement requests, accounting ledgers, partner agreements, and correspondence tying each dollar to cameras/services.	Issue: The records provide amounts and fragments but not a complete funding chain. Follow-up: Produce the complete grant and accounting files by funding source and fiscal year.

9	Specific grant sources referenced in the Feb. 25, 2025 Board item.	See attached responsive records.	Same funding records as item 8.	Funding sources and approximate allocations can be inferred, including FY21 Homeland Security, Byrne SCIP, PG&E, and tax/minor-equipment entries.	Partially answered	The complete Board-referenced grant source documentation and reconciliation to the \$45,500 first-year invoice.	Issue: The produced fragments do not clearly reconcile all sources to the Board agenda amount and invoice. Follow-up: Provide a source-by-source funding reconciliation and the underlying award/approval records.
10	Monthly total number of ALPR searches from inception to present.	See attached responsive record.	Searches by month 2023 to June 2026.csv.	Monthly totals begin in August 2023 and total 4,080 through June 2026.	Fully answered as to monthly totals	User-level/detail logs were not requested in this item, but monthly totals do not explain the pre-contract access basis.	Issue: The first searches predate County-camera approval and installation. Follow-up: No supplementation needed for the monthly-count component; cross-reference the pre-contract access follow-up.
11	Whether any federal agency, task force, contractor, employee account, or indirect federal access existed.	No such records exist; ACSO only shares with California law-enforcement agencies.	Outgoing and incoming sharing reports; NCRIC references.	No federal account is expressly identified in the produced reports. The records do show NCRIC/fusion-center and broad sharing relationships requiring closer classification.	No responsive records claimed / unresolved	Search description; indirect access through fusion centers, joint task forces, shared state/local accounts, contractors, or downstream sharing; account-domain review.	Issue: The statement about outgoing California sharing does not answer whether federal or task-force personnel had indirect access. Follow-up: Describe the search and produce or confirm records for direct and indirect federal/task-force/contractor access, including NCRIC.
12	All agencies/entities/users that accessed, queried, received alerts, or otherwise used ACSO data.	Non-investigatory audit logs and agency search-privilege list supplied; other details withheld as investigatory.	Outgoing agency list; administrative audit; monthly searches.	The production identifies configured organizations and administrative activity, but not actual outside access, queries, alerts, or users.	Partially answered / material withholding	Non-investigatory fields from access/search logs; dates, agency/user identity, action type, result count, role, alert delivery; withholding log and segregability explanation.	Issue: The administrative audit is not an access/search audit, and an agency privilege list is not evidence of actual use. Follow-up: Produce segregated non-investigatory metadata and identify withheld record categories and fields.

1 3	Policies, audits, compliance reviews, or reports about outside sharing and Civil Code compliance.	Policies previously supplied and online; see attached responsive record.	General County IT Use and Security Policy; sharing reports; previously supplied ALPR policy (not duplicated in ZIP).	The production contains configuration reports and a generic IT policy, but no ALPR-sharing compliance review or audit report.	Partially answered / mostly unanswered	ALPR-specific sharing procedures, periodic reviews, Civil Code compliance assessments, approvals, misuse checks, and audit findings.	Issue: The attached generic IT policy is not an ALPR data-sharing compliance record. Follow-up: Identify and produce ALPR-specific compliance/audit records or confirm none exist after a documented search.
1 4	The policy referenced in the Sept. 13, 2023 email, including drafts, prior versions, approvals, and memoranda.	Policy manual previously supplied and online.	Previously supplied final policy only; no draft/approval file in current ZIP.	A final/current policy exists, but the record referenced as being prepared in September 2023 is not traced through drafting or approval.	Unanswered	Sept. 2023 draft; revision history; Lexipol workflow/metadata; approval/adoption record; implementation memo; prior versions.	Issue: Providing the current manual does not answer the request for drafts and approval history. Follow-up: Produce drafts, version history, approvals, or confirm none were retained and describe the search.
1 5	Audits, compliance/policy reviews, misuse/discipline/administrative reviews, or corrective actions since Jan. 2023.	Refer to audit log; no other records. Misuse/discipline/corrective-action records, if they existed, would be personnel records.	Administrative audit CSV.	The CSV shows system-administration events, not compliance findings or search-use review.	Partially answered / mostly unanswered	Confirmation whether misuse or corrective-action records exist; segregated non-identifying/aggregate portions; audit-review reports; policy review records.	Issue: The response is hypothetical ("if they existed") and does not clearly state whether a search found such records. Follow-up: State whether each category exists and produce segregable non-personnel portions or a category-specific withholding description.
1 6	All categories of data captured, processed, stored, retained, or available through Flock.	See attached responsive records.	Contract/draft agreement; training and product materials; search/product emails.	Records describe still images, plate and vehicle attributes, Vehicle Fingerprint/search features, timestamps/location/direction, hotlists/alerts, exports, and potentially shared video/audio products from other agencies.	Partially answered	A system-specific data dictionary; enabled/licensed fields; storage locations; retention by category; distinction between ACSO cameras and shared networks.	Issue: Generic marketing describes capabilities that may not be enabled for ACSO. Follow-up: Produce enabled-feature configuration, data dictionary, and contract/order-form mapping.
1 7	Whether Vehicle Fingerprint is used and what characteristics are captured/searchable.	See attached responsive records.	Contract/product materials; search/training emails.	Vehicle characteristics such as make, color, body type and other visual attributes are described as searchable; the contract references Enhanced LPR/Vehicle Fingerprint capabilities.	Partially answered	Feature-enabled status for ACSO; exact characteristics; retention; audit of use; distinction between marketing claims and active configuration.	Issue: Marketing and contract language do not conclusively prove which feature fields ACSO actually enabled or used. Follow-up: Provide configuration screenshots/export and current feature list.

1 8	Image resolution, dimensions, format, and quality.	No responsive record exists.	None.	The production does not answer the technical image-specification request.	No responsive records claimed	Search details; any vendor spec, sample export metadata, procurement specification, or camera configuration.	Issue: Other produced marketing/spec materials do not supply precise dimensions or format. Follow-up: Confirm custodians/systems searched and request the technical specification from Flock if held by ACSO.
1 9	Screenshots, manuals, training, or records showing the user view of reads, alerts, searches, or history.	See attached records; requested screenshot records do not exist.	Training emails/links, product materials, Nova one-sheet, system notices.	The production provides descriptions and external training links, but few preserved user-interface records and no ACSO screenshots.	Partially answered	Locally retained manuals, webinar decks/recordings, help-center exports, user training attachments, sample reports, and any screenshots embedded in Board/training materials.	Issue: External links are not preserved records and may change or become inaccessible. Follow-up: Produce archived copies of materials relied upon or identify why they were not retained.
2 0	Whether system captures cropped plates, full vehicles, multiple/front/rear/side images, or combinations.	See attached responsive records.	Contract/product materials and training communications.	Records support still-image capture and vehicle imagery/attributes, but do not provide a definitive ACSO camera-by-camera imaging specification.	Partially answered	Camera orientation, number of images per detection, plate crop versus context image, front/rear capability, and sample metadata.	Issue: Generic vendor materials may describe products not deployed in Amador County. Follow-up: Produce deployed-camera specifications and configuration records.
2 1	Whether any available device can capture/process audio, detections, video, clips, continuous video, still images, or other media.	See attached records; Amador cameras capture only still images.	Contract/order materials; product marketing; incoming shared-network report.	The County-purchased Falcon devices appear contracted as LPR still-image cameras. Other jurisdictions share networks labeled Condor, Raven, PTZ, VMS and related products with ACSO.	Partially answered	Enabled access to shared video/audio networks; whether users had roles for VMS/live/historical/download; device-level capability/configuration.	Issue: The answer about Amador-owned cameras does not fully address devices or functionality "available to" ACSO through sharing. Follow-up: Produce role/network configuration for non-LPR shared products and clarify whether ACSO users can access them.
2 2	Whether audio/video/non-ALPR functions are enabled, licensed, subscribed to, or available under ACSO agreement.	ACSO could access these from other jurisdiction s if shared.	Contract; incoming sharing report; pending-share permission email.	The contract is for Falcon LPR/FlockOS-related services; incoming network names indicate possible shared VMS, Condor, Raven and PTZ availability.	Partially answered / unclear	Exact enabled permissions and accepted networks; whether any ACSO user can access live/historical video, downloads, audio detections, or alerts.	Issue: The response concedes possible access but does not identify what is actually shared or enabled. Follow-up: Provide an export of roles, networks, and product permissions for all ACSO users.

2 3	How images are generated: stills, video extraction, buffered video, or another method.	See records; contact Flock for technical details.	Contract/ product materials.	The Sheriff states deployed cameras capture still images, but the production lacks an authoritative technical record explaining the imaging pipeline.	Partially answered	Technical specifications or vendor correspondence held by ACSO; camera configuration and firmware documentation.	Issue: A factual answer is not a substitute for responsive records if ACSO relied on vendor materials. Follow-up: Produce any held technical materials or identify the search and confirm none are retained.
2 4	Materials requested/ reviewed/relied upon about image capture, Vehicle Fingerprint, video, audio, and collected data.	See attached responsive records.	Flock sales emails, draft agreement, sole-source letter, product/ marketing emails, training links, Nova materials.	ACSO received substantial Flock-authored marketing and technical explanations.	Partially answered	Missing attachments/linked resources; preserved demos/recordings; Board packet FAQ/privacy materials; evidence of what ACSO actually relied on.	Issue: Many records are generic marketing, and some referenced resources were not produced. Follow-up: Produce archived copies of referenced materials and identify which were used for policy/procurement decisions.
2 5	Copies of records responsive to the immediately preceding technical-materials item.	Request unclear; see above.	Same materials as item 24.	The intended cross-reference is reasonably apparent from context, but no separate clarification was sought.	Unanswered / treated as unclear	Clarification communication and complete copies of all item-24 records.	Issue: The response labels the item unclear rather than seeking clarification before closing it. Follow-up: Confirm item 25 was intended to request copies of item-24 records and supplement any omitted materials.
2 6	Category-by-category retention periods, storage locations, and whether retained by Flock, ACSO, or both.	See attached records; Flock stores captured images 30 days; investigating agencies may keep flagged/downloaded images longer.	Contract; Feb. 2025 retention email chain; policy previously supplied; audit/ search reports.	Flock default image retention is 30 days and one-year cloud retention was offered for extra cost. Administrative/search-related records persist longer than 30 days.	Partially answered	Retention for searches, alerts, hotlists, audit logs, metadata, exports, flags, downloaded images, evidence, shared video/audio; storage locations and deletion rules.	Issue: The broad request is answered primarily with one sentence about captured images. Follow-up: Provide a retention schedule/data map for every requested category.

27	Explain conflict between 30-day Flock retention and Policy 473.5 minimum one-year server storage, including downloads/exports/local storage.	Same 30-day/flagged/downloaded statement.	Feb. 19-25, 2025 email chain; contract; final policy previously supplied.	ACSO identified the conflict before Board approval; Flock said one-year retention costs extra and default data deletes after 30 days. No produced record shows the “necessary changes” were made.	Unanswered / major unresolved conflict	Meaning of “the server”; policy revision or implementation decision; download/export/flag procedures; local storage; category-specific retention; evidence/case file rules.	Issue: The response repeats 30 days but does not reconcile or implement the one-year policy provision. Follow-up: Produce all policy drafts/revisions and a written, record-supported reconciliation of the two retention rules.
28	All ALPR vendors/products researched, considered, compared, demonstrated, or discussed before choosing Flock.	See attached responsive records.	Flock communications /proposals; historical Vigilant purchase orders, claim and 2023 renewal quote.	The records show extensive engagement with Flock and an existing Vigilant investigative-data subscription. They do not show a documented competitive vendor review.	Partially answered / claimed research not substantiated	Identity of the claimed second company; communications, demos, quotes, notes, product comparisons, and search methodology for other vendors.	Issue: Historical Vigilant purchasing is not the same as a contemporaneous comparison of Flock with competing ALPR camera vendors. Follow-up: Identify every vendor considered and produce all related records, or state that no comparative research records exist.
29	Criteria, factors, requirements, or standards used to compare ALPR vendors/products.	See attached responsive records.	Flock sales materials and vendor-authored sole-source letter.	Flock promoted its network, product suite, pricing and deployment approach. No ACSO-authored evaluation criteria were produced.	Unanswered	Requirements list, scoring, procurement criteria, privacy/data-sharing/retention standards, technical requirements, cost comparison.	Issue: A vendor-authored sole-source letter is not an agency evaluation framework. Follow-up: Produce evaluation criteria or confirm none were documented.
30	Reports, studies, analyses, notes, charts, scoring, recommendations , or records about vendor evaluation/selection.	See attached responsive records.	Flock proposal/quote, draft agreement, sole-source letter; Vigilant purchasing records.	No comparison report, scoring sheet, recommendation memo, or independent analysis was produced.	Unanswered	All evaluation/selection work product and internal notes; records held by Sheriff, GSA, County Administration, County Counsel, IT, purchasing.	Issue: The response points to records that do not perform the requested evaluation. Follow-up: Search all relevant custodians and produce the evaluation records or state none exist.

3 1	All ACSO-Flock communications and attachments Jan. 2023-Mar. 31, 2025.	See attached responsive records.	EMLs through March 2025 and attachments.	Substantive sales, MOU, mapping, quote, policy/retention, Board and kickoff communications were produced.	Partially answered / completeness unclear	Missing signed MOU, maps, Board packet/resolution, project attachment, recordings, and other referenced attachments; custodian/search detail.	Issue: Several chains refer to absent attachments or external-only resources. Follow-up: Supplement missing attachments and provide a production index tied to custodians and date range.
3 2	All ACSO communications with any other ALPR vendor/provider/reseller/consultant from Jan. 2023-Mar. 31, 2025.	See attached responsive records.	Historical Vigilant quote/purchase records; July 2026 fiscal email; no contemporaneous non-Flock communication EMLs.	A Vigilant renewal quote dated October 2023 exists, but no communications with a competing vendor were produced.	Unanswered / materially incomplete	Emails and attachments with Vigilant/Motorola or any other vendor; procurement/reseller correspondence; records explaining the quote and renewal decision.	Issue: The stated response implies responsive communications were attached, but the production contains no actual non-Flock vendor communication thread in the requested period. Follow-up: Produce the communications or confirm after a documented search that none exist.
3 3	RFIs/RFPs/RFQs, vendor responses, proposals, quotes, demos, literature, pricing, or marketing from ALPR vendors.	See attached responsive records.	Flock quote/proposal/draft contract/marketing; Vigilant renewal quote; historical POs.	Flock pricing and marketing and one Vigilant subscription quote were produced. No RFI/RFP/RFQ or broader competing proposals were found.	Partially answered	Any formal solicitation, competing quote/proposal, demo material, reseller response, and procurement file.	Issue: The record set is overwhelmingly Flock-authored and does not demonstrate market-wide solicitation. Follow-up: Confirm whether a solicitation occurred and produce all vendor responses.
3 4	Meetings, demos, presentations, webinars, trainings, or discussions with ALPR vendors, including date, attendees, vendor, subject.	See attached responsive records.	Calendar invitations; email chains; training and meeting notices.	Numerous Flock meetings, mapping calls, budget meetings, demos, kickoff and trainings are documented.	Partially answered	Attendance records, meeting notes, recordings, agendas, and any non-Flock vendor meetings.	Issue: Calendar invitations show scheduled events but not attendance or substance. Follow-up: Produce attendance/notes/recordings and identify canceled versus held events.

3 5	Why Flock was selected over competitors, including recommendations, approvals, comparisons, or justification.	See attached responsive records.	Flock-authored sole-source letter; Flock sales emails; Board/procurement communications; Vigilant historical records.	The production shows Flock advocating for its product and assisting with procurement, but no ACSO-authored comparison or documented reasoned choice over a competitor.	Unanswered	Decision memo; recommendation; comparative price/features; procurement justification; final decision-maker and approval chain.	Issue: A vendor-authored sole-source letter does not independently establish why ACSO selected Flock over alternatives. Follow-up: Produce the agency's selection rationale and decision records, or confirm the choice was not documented.
3 6	Privacy, civil-liberties, constitutional, surveillance, retention, sharing, accuracy, reliability, or misuse concerns considered during selection.	See attached responsive records.	Retention email chain; Flock FAQ/privacy/marketing references; final policy previously supplied.	The production documents one concrete retention concern and vendor-provided privacy messaging. It does not show a broad, independent civil-liberties or reliability analysis.	Partially answered / mostly unanswered	County Counsel/IT/privacy review; accuracy/error analysis; data-sharing risk assessment; misuse controls; constitutional analysis; public-impact assessment.	Issue: The retention conflict was recognized, yet no produced record shows its resolution before or after approval. Follow-up: Produce all issue analyses and identify whether County Counsel or Administration reviewed them.
3 7	Communications/reports/recommendations to Sheriff, Undersheriff, command staff, County Administration, County Counsel, or Board about selecting Flock.	See attached responsive records.	Internal forwards, Flock sales/Board preparation threads, quote/contract/deployment records.	Some command-staff communications and Board-preparation activity are documented.	Partially answered	Complete internal decision chain; County Administration, GSA/purchasing, County Counsel and Board communications/attachments; recommendation and approval record.	Issue: The production is vendor-email heavy and thin on internal County decision records. Follow-up: Search all named custodians and produce the internal recommendation/approval file and missing Board attachments.

Missing or referenced-but-not-produced records

Category	Record/information	Why expected	Items
Pre-contract access	Mutually signed July 2023 Flock MOU and all applicable free-plan/Community Tier terms.	Email chain expressly says the MOU was signed and mutually completed and would grant system/search access.	1, 2, 3, 4, 31
Pre-contract access	Complete account, user-role, network-assignment, entitlement and access-history exports for 2023-2025.	Administrative audit and sharing emails show accounts and roles existed, but scope/status is not reported.	1, 2, 3, 5, 6, 11, 12

Training	Search Tool certifications, training completion records, and training-file records for users instructed to certify.	Emails instructed personnel to complete certification and submit certificates.	1, 3, 15, 19
Planning/procurement	August 2023 deployment maps and the generated 16-camera quote.	Aug. 31 email links to two maps and says a quote was generated.	4, 31, 33, 34
Board approval	Board letter/resolution attachment circulated Feb. 19, 2025 and the FAQs/Privacy Commitment added to the packet.	The email chain refers to attachments/resources, but the EML has no attachment.	4, 24, 31, 36, 37
Planning/procurement	Project/proposal attachment referenced in the Jan. 14, 2025 "Re: The New Guy!" chain.	Message refers to a project/proposal, but no attachment was preserved.	4, 31, 33, 37
Training	Training resources/recordings referenced in 2025 training communications.	Emails reference recordings and resources; several exist only as external links.	4, 19, 24, 34
Policy	September 2023 ALPR policy draft, prior versions, approval/adoption records, and implementation memoranda.	The earlier email said the policy was being prepared/pushed out; current final policy does not show development history.	14, 15, 27, 36
Retention	Policy/procedure defining "the server," downloads, exports, flags, local storage, evidence retention, deletion and purging.	Policy and Sheriff response refer to one-year server storage and longer retention after flag/download, but no implementation record explains either.	26, 27
Search/audit	Search/access audit logs with segregable non-investigatory fields.	Item 12 requested actual access/use; only admin audit and monthly totals were supplied.	10, 12, 15
Sharing	Sharing dates, active/pending/accepted/revoked status, exact permissions, user-role assignments and actual-use logs.	Both sharing CSVs omit these fields; pending-share email shows multiple permission types exist.	5, 6, 11, 12, 13, 21, 22
Vendor selection	Communications, quotes, demos, evaluation criteria, comparison documents, recommendations and decision records concerning any competitor.	Sheriff previously described extensive research/another company, but the production does not substantiate it.	28-36
Vendor selection	Communications with Vigilant/Motorola or another ALPR vendor during Jan. 2023-Mar. 2025.	A Vigilant renewal quote exists, but no corresponding communication thread was produced.	32, 33, 34, 35
Installation	Complete inventory for all ten contracted cameras, including activation/current status and relocation history.	Install sheet has eight entries and deployment reports refer to ten devices.	7
Funding	Complete grant applications, award letters, grant agreements, reimbursement requests, approvals, accounting records and partner agreements.	The production contains fragments and amounts but not complete funding files.	8, 9

Withholding/search	Record-category withholding log, segregability explanation, custodians, search locations, search terms, and date range for categories claimed absent or withheld.	The response uses general exemptions and “no records” statements without a detailed production/withholding index.	4, 11-15, 18, 25, 31-37
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Contradictions and unexplained issues

Issue	Confirmed facts	Unresolved question	Items
Claimed extensive competitor research is not substantiated	The production is dominated by Flock communications. Historical Vigilant POs and one 2023 renewal quote show an existing subscription, but no comparison, competing proposal, scoring, demo notes, criteria, or selection memorandum.	What was the second company and where are the records of the claimed research?	28-36
Operational use preceded formal camera approval	Accounts were created in August 2023 and monthly search totals begin that month; the Board item occurred February 25, 2025 and County-camera installs began in May 2025.	What legal/contractual/account-tier basis supported 2023-24 searches, and what data/cameras were accessible?	1-3, 10, 31
Free access change versus continued searches	Flock said broad free access would end April 1, 2024 and Community Tier would limit access; ACSO nevertheless recorded searches throughout 2024.	Did ACSO become a paying customer, retain direct shares, use private cameras in jurisdiction, or use another arrangement?	1-3, 6, 10
30-day retention versus one-year policy	Flock default is 30 days; Captain Martin noted the policy said one year and asked to make necessary changes; no resolution was produced.	Was policy 473.5 changed, ignored, or applied only to downloaded/local data? What is “the server”?	26-27
Sharing statement is narrower than the records	Outgoing report is California-oriented, while incoming report includes at least 30 clearly out-of-state organizations and networks labeled Condor, Raven, PTZ and VMS.	Which incoming shares were accepted, assigned to roles, searchable, or actually used; and was any access indirect through federal/fusion/task-force structures?	5-6, 11-13, 21-22
Agency list is not actual-use evidence	Sheriff cites agency privileges and an administrative audit, but neither shows which outside users accessed/searched/received alerts from ACSO data.	What segregable access-log metadata exists and what exactly was withheld?	12, 15
Ten-camera contract versus eight install entries	Contract/deployment materials describe ten cameras; install sheet contains eight dated rows.	Where are the remaining two devices, and what are the activation/current statuses of all ten?	7

Generic IT policy treated as responsive ALPR compliance material	document.pdf is a general County IT policy, not an ALPR-specific sharing or Civil Code compliance audit.	Do ALPR-specific compliance reviews, sharing procedures or audits exist?	13, 15
Invitations, configured sharing and actual access are conflated	Invitation emails require an admin to add networks to roles; pending-share email shows requests can remain pending; reports do not state accepted/active status.	Which invitations were accepted, which networks were role-assigned, and who used them?	2, 5, 6, 12
Product capability versus purchased/enabled product is not separated	Flock marketing describes Nova, Condor, Raven, live video and other products; current order records show Falcon LPR/ FlockOS-related services.	Which non-LPR products, if any, were enabled through sharing or purchased by ACSO?	16-24

Exemption and withholding review

Government Code § 7923.600(a): The response says “other specific details” concerning access/use were withheld as investigatory records. The production does not identify the records, categories, fields, or date ranges withheld. A narrower production of administrative metadata may be possible without revealing investigative facts; that is a legal question for further review.

Government Code § 7927.700: The response invokes the personnel-record concept hypothetically for misuse, discipline and corrective action. It does not clearly say whether records exist, and it does not discuss segregable non-identifying or aggregate information.

Civil Code § 1798.90.55 and Government Code § 7927.705: Those authorities may restrict disclosure of ALPR information itself, but the response does not explain why non-ALPR configuration metadata, agency names, access dates, roles, policy records, or segregable audit fields would necessarily be withheld. This report does not reach a definitive legal conclusion.

Other response problems: multiple items are answered with factual statements rather than records; several rely on unidentified “previously supplied” records; item 25 was called unclear without a clarification request; and “no records” responses do not describe the search.

Email-production review

The email index classifies the production so substantive communications can be separated from automated or promotional material. Counts by category:

Category	Count
Account/security/system notice	5
Camera-sharing invitation	9
Deployment/installation notice	34
Funding/procurement	6

Meeting/calendar record	20
Other email record	14
Substantive agency/vendor correspondence	26
Training/user administration	10
Vendor marketing/product promotion	22

Repeated quoted chains mean 146 EML files do not equal 146 wholly unique communications. Exact raw duplicates were not found, but repeated chain content and identical attachment copies occur. See `indexes/duplicate_analysis.csv`.

Website integration recommendation

Because the current website source bundle was not included with these records, this package does not overwrite or guess at the site structure. It includes neutral, website-ready HTML and JSON for later insertion as a versioned changed-files-only patch after the current bundle is supplied.

- **Unified response page:** agency response, production statistics, download links and methodology.
- **Request-response matrix:** filterable 37-item table with status badges and source links.
- **Email correspondence:** searchable index linking archival HTML, PDF, TXT, original EML and attachments.
- **Pre-contract timeline:** 2020 Vigilant context and 2023-2025 Flock access, searches, planning and approval.
- **Vendor selection:** separate “records produced” from “claimed but not substantiated.”
- **Sharing and access:** outgoing, incoming, reciprocal, out-of-state and permission/status distinctions.
- **Retention discrepancy:** 30-day contract/default, one-year policy, February 2025 internal discussion and unresolved questions.
- **Product expansion:** generic marketing versus documented ACSO inquiry or action.
- **Funding:** source-by-source table with confirmed amounts and missing grant documents.
- **Findings and open questions:** clearly labeled confirmed facts, reasonable inferences and unresolved issues.

Method and limitations

This is an organizational and records-analysis review, not a definitive legal opinion. “Confirmed” means supported by a produced record; “reasonable inference” is explicitly identified; and “unresolved” means the production does not establish the answer. External links embedded in emails were not treated as preserved attachments. The current website bundle was not available, so no site files were changed.