

CHICO POLICE DEPARTMENT

Automated License Plate Reader (ALPR) Program Review

An Internal Review of Program History, Administration, Data Sharing, and
Legal Considerations

September 2026

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1. Executive Summary:

This report was prepared at the direction of Chief Billy Aldridge to provide a comprehensive review of the Chico Police Department's (CPD) Automated License Plate Reader (ALPR) program. The review was prompted by a recent news article and subsequent derivative coverage inquiring about CPD's use of ALPR technology and its practice of sharing detection data with agencies outside of California and with federal agencies, including whether those practices conflict with state law and immigration enforcement restrictions. This report documents the program's origins, funding, and technical scope; explains how the program is administered and how data sharing with other agencies works; surveys the Constitutional, federal, state, and local legal considerations that bear on ALPR use; and traces CPD's recent policy decisions, including the July 8, 2026, decision to suspend sharing with out of state and federal agencies and the resulting communications with the California Attorney General's Office.

CPD's ALPR program began with mobile cameras approved by City Council in 2013 and transitioned to fixed cameras starting in 2023 (Phase 2) with 36 fixed Motorola L5F cameras at seven locations, funded initially through Camp Fire mitigation funds and capital project #50439. Phase 3, approved in 2024 which is still being implemented, adds 10 Motorola L6Q cameras at three additional locations. Once finished, the system will operate 53 cameras across 13 locations throughout the city. As of August 31, 2026, roughly \$624,200.87 in capital project funds have been spent operating the program. The system, run through Motorola's Vehicle Manager 8.0 platform (formerly LEARN), generates approximately seven million detections a month and retains about 80 million detections at any given time under a rolling 365-day deletion policy. 124 authorized CPD personnel have access to the system, administered by the Operations Captain with several backup administrators.

A central focus of this review is data sharing. As of this report, CPD allows 166 agencies (all in California) to query its database and can query the databases of 203 other agencies nationwide. Prior to July 8, 2026, CPD's sharing network was broader, including roughly 88 out-of-state agencies and 22 federal agencies. On that date, citing California SB 34 and the position of the California Attorney General's Office (including a pending suit against the City of El Cajon), Chief Aldridge discontinued sharing with agencies whose participation could be seen as inconsistent with SB 34, including U.S. Immigration and Customs Enforcement and federal Border Patrol.

The intent of this review is to give City leadership a clear, factual foundation, covering the program's history, its scope and administration, and the legal landscape surrounding it, so that decisions about the future of CPD's ALPR program can be made with full information. This report outlines the history, current policy, audit process, and recommendations

moving forward to ensure compliance with all federal and state laws and regulations. At the time of this report, CPD is in compliance with all regulations related to ALPR use.

Staff recommend the continued use of the audit checklist to ensure ease of transfer of information to the public and consistency in the audit process. Staff recommend a comprehensive review of Lexipol policy changes and process with the City Attorney's Office.

2. Origins of Internal Review

In recent months throughout the country, citizens, social media content creators, and news outlets have become intensely focused on the use of Artificial Intelligence (A.I.), surveillance by technology, and controversy surrounding Flock Group Inc., a major producer of LPR products and other technology. Locally, a recent article and subsequent derivative stories about Chico Police Department's use of ALPR technology and detection sharing practices have catalyzed this review. Focus of the criticism has been on CPD's previous data sharing relationship with law enforcement agencies outside of California and federal agencies, alleging our policies and practices conflict with state laws governing privacy, data security, and immigration enforcement as well as federal constitutional principles. The purpose of this internal review is to provide education, clarity, and transparency regarding these claims.

Opposition to government use of technology is nothing new. Groups like the American Civil Liberties Union (ACLU)¹ and the Electronic Frontier Foundation (EFF)² have opposed it for years, taking actions and lobbying for stronger or new laws supporting digital privacy. Several lawsuits related to ALPR data have been resolved in different ways, but **there is currently no prevailing law resolving digital privacy of ALPR data matters definitively.**

Since 2013, when CPD began using ALPR technology, public sentiment appears to have rapidly turned negative against all forms of surveillance technology used by the government, including ALPR usage. This casting of ALPR technology into the spotlight seems to stem in part from controversy surrounding Flock Group Inc. In general, Flock has been accused of improperly accessing/collecting/selling/sharing data obtained from ALPR and surveillance cameras. In the larger public sphere of this debate, ALPRs and all cameras (plate reader, red light enforcement, parking enforcement, toll booths, public and private surveillance cameras) are commonly referred to as Flock cameras despite widely different manufactures and applications. Despite Flock becoming the face of this topic, specific grievances against Flock are only a fraction of the greater debate. **Although CPD**

¹ <https://www.aclunorcal.org> (last visited 9/6/26).

² <https://www.eff.org> (last visited 9/6/26)

does not own or operate any Flock products, there are still numerous overlapping concepts that do not evaporate simply because CPD utilizes products from Motorola or any other company.

At CPD, the responsibility of ALPR systems was delegated to the Operations Captain, a role inherited by the person assigned to the position. Since none of the employees involved in the 2013 startup of the original ALPR program still work for the department, Chief Aldridge assigned the Current Operations Captain and ALPR Administrator, Jeramie Struthers, to complete a comprehensive review of the history of the program, how CPDs administers the program, current/relevant factors, and provide viable education for current city leaders to make informed decisions about the future of ALPR technology at the local municipal level.

3. Chico ALPR Program Formation Background:

The Chico ALPR system's history can be divided into three overlapping phases of purchasing and installation; original ALPR system, phase 2, phase 3. Each phase has its own history of formation and funding. This report does not seek to identify or outline funding regarding the original ALPR cameras because they are no longer in use. The City currently operates cameras from phase 2 and phase 3 of the program.

The acquisition and use of ALPR technology by CPD was first meaningfully discussed publicly on **February 19th, 2013**, by way of a staff report by then Chief Kirk Trostle (Ret.), at a regular City Council meeting³. The ALPR topic was properly agendaized and discussed allowing for public comment. At that time, there were significant legal and financial factors being considered in addition to public opinions on privacy, technology, data sharing, data storage, and surveillance which led to the item being referred to an internal affairs committee.

On **April 10th, 2013**, the Internal Affairs Committee held a public meeting and further deliberated the topic. This meeting was also agendaized and publicly held allowing for public comment. The committee's report was publicly heard at the **September 3rd, 2013**, council meeting⁴. Public comment was available again before council approved (5/2) the implementation of an ALPR program.

³ City of Chico, Minutes of the Adjourned Regular City Council Meeting, Agenda Item 2.2 ("Acceptance of Donation – Auto License Plate Reader") (Feb. 19, 2013), http://chico-ca.granicus.com/MinutesViewer.php?view_id=2&clip_id=370&doc_id=9db34992-d762-1030-9122-24b3144c4264

⁴ City of Chico, City Council Agenda Report (Sept. 3, 2013), Attachment B (Minutes of the Internal Affairs Committee Meeting of Apr. 10, 2013), https://chico-ca.granicus.com/MetaViewer.php?clip_id=416&meta_id=36829

On **October 1st, 2019**, the subject of ALPR was again brought forward during a public City Council meeting by way of a staff report by then City Manager Mark Orme regarding how to prioritize spending of Campfire Mitigations funds⁵. City Manager Orme directly spoke to the use of mitigation funds to expand the use of ALPR technology to aid law enforcement's public safety efforts. Public comments were received at that time. City Manager Orme's recommendation for allocating a portion of Campfire mitigation funds to an ALPR program was approved by City Council (6/1), see **Capital Project #50439**⁶.

Given that the expense of purchasing a system far exceeded the initial allocation of Campfire mitigation funds, the City approved an initial upfront General Fund expenditure for installation followed by four annual installment payments. Installment payments include the cost of the camera equipment and all yearly subscription fees associated with their operation. After fulfilling all installment payments, the City owns the camera infrastructure.

Phase 2: \$200,000 initial allotment for year 1 installment and installation.

 \$96,510 annual allotment for installment payments.

On **May 21st, 2024**, Chief Aldridge requested funding for an ALPR expansion through the regular city budgeting process⁷. The budget discussions did not conclude during that meeting and were subsequently carried over to the **June 4th, 2024**, council meeting. The funding for ALPR expansion was approved on **June 4th, 2024**, by the resolution to adopt the city's FY2024/25 proposed annual budget⁸. Phase 3 consisted of a one-time \$72,875 allotment and four annual allotments of \$48,905 to cover four additional installment payments. Due to specific requirements and permitting for several of the Phase 3 camera locations, a one-time allotment of \$50,000 was added to the existing capital project to cover expenses incurred by the City's Engineering Division⁹.

⁵ City of Chico, City Council Agenda, Item 5.3 (Staff Report – Mark Orme, City Manager, re: Prioritization of Camp Fire Mitigation Funds) (Oct. 1, 2019), https://chico-ca.granicus.com/GeneratedAgendaViewer.php?view_id=2&clip_id=864

⁶ City of Chico, 2020-21 Annual Budget & Capital Improvement Program 2019-20 through 2029-30, Fund 001 – General Fund, Capital Expenditures, Project No. 50439 ("ALPR Project"), at 39, https://chicoca.gov/documents/Government/Resources/City-Budget/Annual-Budget/2020-21_city_annual_proposed_budget_all_combined_page_numbers.pdf

⁷ City of Chico, Regular City Council Meeting, Video Recording, Agenda Item 1.4.A.5 (Remarks of Chief Billy Aldridge Regarding Proposed Expansion of the Automated License Plate Reader Program) (May 21, 2024), at 1:50:13, https://chico-ca.granicus.com/MediaPlayer.php?view_id=2&clip_id=1165

⁸ City of Chico, Minutes of the Regular City Council Meeting, Agenda Item 5.3 (Resolution Adopting the FY2024-25 Proposed Annual Budget) (June 4, 2024), https://chico-ca.granicus.com/MediaPlayer.php?view_id=2&clip_id=1166

⁹ City of Chico, *FY 2026-27 Proposed Budget*, ALPR Project (Project No. 50439), <https://city-chico-ca-cleardoc.cleargov.com/25665/1024784/d>

Phase 3: \$72,825 initial allotment for year 1 installment and installation.
 \$50,000 Engineering & Permits.
 \$48,905 annual allotment for installment payments.

The City of Chico has numerous Motorola contracts for a variety of services and therefore all accounting was wrapped into a global agreement handled through Information Systems (I.S.). Project payments and invoicing are interwoven with payments for the City's P25 radio infrastructure project, Avigilon (video cameras), and Vigilant (ALPR) systems. Ongoing maintenance and upkeep of the ALPR system since its activation in 2023, has been charged to capital project #50439. As of 8/31/2026, Capital Project #50439 has expended a total of \$624,200.87 which can be directly attributed to purchasing, operating and maintaining the Motorola ALPR program. None of the previously described accounting can be associated with the 2013 operation of mobile ALPR cameras implement by Chief Trostle (Ret.). The original ALPR mobile equipment was acquired through funds donated by a private community group called The Chico Police Department Business Support Team (CPDBST).

4. Chico ALPR System Overview:

a. Infrastructure:

After approval, in **2013**, CPD began operating two (2) patrol cars up-fitted with license plate cameras (original program). For a variety of reasons, over the next decade, CPD phased out these mobile systems in favor of fixed locations cameras. In **2023** CPD installed **36 Motorola model L5F**¹⁰ fixed cameras covering seven (7) locations (Phase 2). The model L5F camera's capacity/field of view was limited, and multiple LPR cameras were typically needed to cover a single intersection or at times, one LPR camera per lane of travel on a multi-lane roadway. Given limited funds and thousands of possible installation locations, CPD used a combination of factors including common points of ingress/egress to the City, high traffic, and high crime concentration zones to determine placement.

In **2025**, CPD added **10 Motorola model L6Q**¹¹ fixed cameras covering three (3) new locations (Phase 3). The LQ6 model LPR camera's field of view is significantly better than its predecessor and requires less fixed infrastructure to deploy, allowing fewer cameras to cover a location for less money. As of this report, Phase 3 has not been completed. CPD

¹⁰ Motorola Solutions, *L5F Fixed LPR Camera System Data Sheet* (2020), https://www.motorolasolutions.com/content/dam/msi/docs/products/license-plate-recognition-systems/l5f-fixed-lpr-camera-system/l5f_fixed_lpr_data_sheet.pdf.

¹¹ Motorola Solutions, *L6Q Quick-Deploy LPR Camera System Data Sheet* (2025), <https://www.motorolasolutions.com/content/dam/msi/docs/products/license-plate-recognition-systems/l6q-quick-deploy-lpr-system/l6q-quick-deploy-lpr-camera-datasheet.pdf>.

has seven (7) LQ6 cameras in storage awaiting installation at three (3) additional locations pending permitting approval. In total, CPD currently operates **46 fixed cameras covering 10 locations** and does not operate any mobile cameras. If all planned installations are completed, CPD will have **53 cameras covering 13 locations citywide**.

b. Detection Summary:

CPD's system generates approximately 7 million detections per month. This statistic does not exclude duplicate vehicles as every detection is a separate event. One vehicle can register multiple detections at a single location. For the month of August 2026, the system detected 7,704,085 vehicles. From 8/1/25 to 7/31/26 CPD detected 85,828,939 vehicles. Given the perpetual deleting of detections on a rolling 365-day basis, it is reasonable to estimate that Chico's database contains about ≈80 million detections at any given time.

c. Chico Users Search Summary:

CPD conducts a varying number of searches per month based on routine and major case activity in the City. Auditing features with Vehicle Manager 8.0 are not user friendly and do not allow for much utility for granular statistics gathering. Auditing reports are comprised of multiple data points and are not simply tallied by "searches conducted" or "detections viewed" nor does it exclude searches that yielded no results. Even a smaller sample size of one month does not immediately produce simple statistics. In the month of July 2026, the auditing report for CPD users was comprised of 1,672 log entries. There is one line for the search and then one line per result that was viewed. During the arson investigation of the Bidwell Mansion fire, 12/1/24 to 12/31/24, CPD users audit report was comprised of 3,255 entries.

5. Chico PD ALPR Program Review:

a. Vehicle Manager 8.0 (LEARN):

The Motorola application used by law enforcement is Vehicle Manager 8.0¹², formerly branded as LEARN, the Law Enforcement Archival Reporting Network. All ALPR operations for CPD are conducted through Vehicle Manager 8.0 which is the core for ingesting vehicle detections, searching detections, interagency access sharing, and auditing. System user's access is permissions based allowing varying levels of capability. System "users" is the basic functional setting that allow for searching and the ability to receive alert notifications. System Administrator is the highest level of access which allows for the

¹² Motorola Solutions, *VehicleManager 8.0 Quick Start Guide*, https://vm.motorolasolutions.com/VM8_QuickStartGuide/ (last visited Sept. 9, 2026).

activation/deactivation of new user accounts, department wide and user specific permissions, system functionality (diagnostics), and auditing of records.

b. Authorized Users:

Responsibility for administering the ALPR program is assigned to the Operations Captain, currently filled by Jeramie Struthers. All functions, settings, sharing agreements, policies/practices, and user profiles are the responsibility of the Operations Captain. Support Captain, currently Omar Peña, is not directly responsible for the ALPR system, but has a system admin profile for redundancy should the Operations Captain be unavailable. Crime Analyst Alexis Williams serves under the Operations Captain and has a system admin profile in order to assist with various tasks associated with running the ALPR program; managing new users, training, MOU tracking, and auditing. Admin Specialist Carly Gott is not directly responsible for the system but has an admin user profile for redundancy should the Crime Analyst be unavailable. IT specialists Will Mansfield and James Bennett, have system admin profiles and assist with functionality, data processing, and cyber security.

As of this report, Chico PD has 124 authorized “user” profiles comprised of Police Officers, Dispatchers, Community Services Officers, and IT staff. Each user is trained and meets the FBI data security standards for operating confidential information systems (CLETS/NLETS). Additionally, each user has completed specific training courses for the operation of Motorola ALPR systems. Each authorized user has a unique username and password for accessing the ALPR system. All ALPR access is further enhanced by dual authentication during the login process.

1 Agency Manager: Operations Captain

1 Backup Manager: Support Captain

4 Admin Profiles: Crime Analyst, Admin Specialist, IT

124 User Profiles: Police Officers, Dispatchers, Community Services Officers, IT staff

c. Data Sharing:

The terminology used for this process is complex. The data sharing relationship between agencies can be broken down into two categories “Detection Sharing” and “Detection Receiving.” Detection Sharing and Detection Receiving is a misnomer as it implies

detections are being sent and received between databases in a continuous stream. Both functions are actually access descriptions. Detection Sharing is a permission for an allied agency to query CPD's database. Detection Receiving is a permission for CPD to query the other agency's database. Data is only "shared" in either direction when there is a detection located that is responsive to the query. All queries are logged as a search, but not all searches yield results.

The data access relationship between agencies can be any combination of share only, receive only, or share and receive. As of this report, CPD allows access to 166 agencies while 203 agencies allow CPD to access their databases. These numbers can change rapidly because CPD or an allied agency can remove access or elect to stop having access to a database at any time. Share access and receive access are different statuses, not individual agencies. A single agency can be represented in both categories.

Currently:

CPD allows access to 166 agencies (all within California)

CPD is allowed to access 203 agencies (throughout the country)

Prior to 7/8/26:

CPD allowed access to approximately 300 agencies

>200 agencies in California

88 agencies in states which border California (Oregon, Nevada, and Arizona)

22 federal agencies

d. Data Sharing MOU:

Data sharing relationships are established with each agency prior to allowing access to CPD's database and before CPD received access to a database. The data sharing MOU's, establish terms of use conditions for the participating agencies. The MOU's are exchanged digitally between the agencies via Vehicle Manager 8.0 (and prior versions). A copy of each MOU is stored in Vehicle Manager 8.0. The MOUs are exchanged digitally, and a copy is sent via email to the agency manager upon execution. Despite the MOU's being stored within Vehicle Manager, CPD staff elected to save a backup copy for our own records. Most likely due to human error, some backup copies were never saved. CPD has 583 backup copies of MOUs on file that consist of current and former allied agencies but also represent updated MOU from agencies over time. Older versions of MOUs were not purged when a

newer version went into effect. Upon ending the user relationship with a particular agency, Vehicle Manager deletes the agreement previously on file. CPD is unable to retrieve all copies of MOUs for relationships that ended, unless a backup was independently saved offline from Vehicle Manager 8.0.

Motorola provides a default or template MOU that can be edited to the preferences of the individual agency. During the implementation in 2023 of the fixed ALPR system at CPD, the default MOU was approved for use by the City Attorney's office with no additional language added. There are different versions of MOUs in existence based on modifications made by various entities. All MOU's contain some variation in language that governs access and expressly establishes that it is the accessor's responsibility to abide by the law. For example, under the **Intended Use** provision, the default MOU reads:

Default Intended Use:

"Each Authorized User agrees that LPR detection data, hotlist information, and the networking resources are to be used solely for law enforcement purposes only and consistent with the law. Authorized Users shall not use or share the information for any unethical, illegal, criminal, or commercial purpose."

*Note: the prior MOU between CPD and Border Patrol is the default MOU.

Modified Intended Use:

"Each Authorized User agrees that scanned plate, hotlist information, and networking resources are to be used solely for law enforcement purposes only and consistent with the law. Authorized Users shall not use or share the information for any unethical, illegal, criminal, or commercial purpose. Pursuant to California Government Code Section 3, Chapter 17.25 (commencing with section 7284) federal, state, or local law enforcement agencies shall not use any non-criminal history information contained within the database for immigration enforcement purposes. This restriction does not pertain to any information that is regarding a person's immigration or citizenship status pursuant to 8 U.S.C. sections 1373 and 1644."

*Note: the prior MOU between CPD and ICE contains the modified language above expressly prohibiting the use of ALPR data for immigration purposes.

e. External Data Sharing Summary:

On 7/8/26 CPD elected to discontinue the sharing relationship with 88 out-of-state agencies and 22 federal agencies, two of which were Immigration Customs Enforcement (ICE) and federal border patrol. Upon ending the sharing relationship, Vehicle Manager 8.0 automatically removed the link between CPD's account and the archival logs tracking transactions between those agencies. Detection data is not archival records of transactions. The detections in CPD's database are still present, but the option to audit outside access is not. The transaction log for ICE and any other former partnering agency is no longer conventionally available through the normal limited and unwieldy audit process.

Numerous meetings with Motorola training and technical support have resulted in some limited functionality being restored. Upon discontinuing the sharing relationship with an agency, the agency's name was removed from the list of available options for auditing. As of this report, ICE (and other agencies) has been restored as an option for auditing, yet the functionality of auditing is still significantly impaired. For unknown technical reasons, archival transaction logs from ICE (or any former sharing agency) can only be retrieved in quantities less than 1000 lines to produce reliable data sets, as opposed to 100,000 lines of a conventional audit. Since all transactions are lumped into one report (searches, detection views, unresponsive records), a single day of logged activity can generate more than 1000 lines on a report. This has resulted in reports taking about 10 minutes to generate, before any data sorting can occur. It takes about 30 minutes to recover a single day of archival transaction log data before line-by-line redaction of protected information can begin.

For this program review, staff manually processed just over one month of transaction data for ICE (5/29/26 to 7/8/26 date sharing ended). It is important to note that there is no distinction between searches conducted nationwide vs. just Chico. All inquiries conducted by ICE, regardless of target location, register as a request for responsive records from Chico. The vast majority of archival transactions do not reveal any records from Chico PD's database. Additionally, there is no accounting for partial license plates which can appear in other states and there is no sorting for general searches like "white car."

ICE Sampling Summary 5/29/26 to 7/8/26:

6,004 total transaction log entries (queries)

5,764 entries had no responsive records from Chico (no record)

240 of 6,004 transactions had 919 detections from Chico's that could be viewed.

12 of 919 responsive records were viewed (Viewing counts as shared data)

A total of 6 unique plate records were viewed out of the 12 records

1 plate return viewed 1 time

1 plate return viewed 1 time

1 plate return viewed 1 time

1 plate return viewed 1 time

1 plate return viewed 2 times (viewed within 3 seconds of each other)

1 plate return viewed 6 times (viewed within 75 seconds of each other)

Given the limited functionality of data retrieval at this time, it is not feasible to manually attempt to process three years of data regarding 88 out-of-state agencies and 22 federal agencies. Given the sample above, there is no doubt that greater than one (1) Chico record was shared. Per the data sharing MOU, use of the data for immigration purposes is prohibited (SB 54).

Motorola is under no obligation to provide data retrieval for agencies that CPD discontinued sharing relationships. Motorola has offered to sell CPD subscription-based access to an **Application Programming Interface (API) for Vehicle Manager 8.0**. The approximate cost for a 1-year API subscription was verbally estimated to cost approximately **\$6,000**. Without further research into the exact capabilities offered by the API, a recommendation is not made. In theory, an API should allow more robust access to CPD's data outside of the preset audit features in Vehicle Manager 8.0. Ultimately, obtaining every record ever shared still established a fact CPD already knows. CPD records were shared with ICE, which is a strong indication data was shared with other agencies as well. Further inquiries regarding how ALPR data was used must be directed to agency that received the data. Given that the debated issue pertaining to compliance with SB 34 centers around sending any data, there seems to be no additional value knowing if the data shared was one (1) record or 100 records. Any additional audit efforts will undoubtedly return a number greater than one (1) record. As of July 8th, CPD is unquestionably in compliance with SB 34 requirements.

6. Legal Concept Considerations

There are multiple legal concepts surrounding ALPR technology. ALPR technology is a lesser-included facet of the broader umbrella of government surveillance related topics. Therefore, at least a topical understanding of the spectrum of legal influences is needed when considering local municipal policy. This section is for general reference of the

complexity surrounding the issue and is not intended to be a legal analysis. The City Attorney's office has been engaged with CPD and City Council to consider the greater understanding of the legalities of past practices and future potential practices.

a. Constitutional Considerations:

At the Constitutional level, predominately the 1st Amendment and 4th Amendments are cited in arguments for and against the use of ALPR. Pro arguments generally express 1st Amendment freedom to record/photograph in public spaces (i.e. anyone can take a photo in public). Arguments against generally express that the 1st Amendment serves the public while restraining the government.

Pro 4th Amendment arguments generally express an inquiry into an ALPR database does not qualify as a search (i.e. there is no expectation of privacy in these public settings). Arguments against generally express that the aggregation of a citizen's data over a period of time amounts to a search under the 4th Amendment and should require a warrant.

There are multiple resources available to research both for and against ALPR technology available from the International Association of Chiefs of Police (IACP)¹³, The Major Cities Chief's Association (MCCA)¹⁴, American Civil Liberties Union (ACLU)¹⁵, and the Electronic Frontier Foundation (EFF)¹⁶

b. Federal Considerations:

At the federal level, the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA)¹⁷ is commonly cited in favor of exchanging information with federal agencies. This law requires state agencies to cooperate with the federal government for immigration purposes. Under the federal supremacy doctrine, the federal law preempts those of the state. Arguments against generally rely on rights and federal government not occupying the field of law.

¹³ Int'l Ass'n of Chiefs of Police, *Automated License Plate Recognition*, <https://www.theiacp.org/projects/automated-license-plate-recognition> (last visited Sept. 6, 2026).

¹⁴ Major Cities Chiefs Ass'n, *Automated License Plate Reader Technology in Law Enforcement* (Feb. 2023), <https://majorcitieschiefs.com/wp-content/uploads/2023/02/MCCA-Automated-License-Plate-Reader-Technology-in-Law-Enforcement.pdf>.

¹⁵ American Civil Liberties Union, *Automatic License Plate Readers*, <https://www.aclu.org/issues/privacy-technology/location-tracking/automatic-license-plate-readers> (last visited Sept. 6, 2026).

¹⁶ Matthew Guariglia, *EFF's Policy Position on ALPR Surveillance: Eliminate It and Reduce Its Harms*, Electronic Frontier Foundation (Aug. 13, 2026), <https://www.eff.org/deeplinks/2026/08/effs-policy-position-alpr-surveillance-eliminate-it-and-reduce-its-harms>.

¹⁷ federal statute: 8 U.S.C. § 1373

c. State of California Considerations:

In California, predominately California SB 34¹⁸ and SB 54¹⁹ are frequently invoked in the ALPR discussion. In particular, information Bulletins No. 2023-DLE-06²⁰ and No. 2025-DLE-03²¹ issued by California Attorney General Rob Bonta. The Attorney General's opinions are advisory and persuasive, but aren't legally binding on courts or agencies.

d. City of Chico Considerations:

At the local municipal level, although not laws, CPD Lexipol policies 429²², 450²³, and 812²⁴ intersect or are responsive to the state and federal laws described previously. CPD's policies do not establish law but rather attempt to create the framework by which the department operates within them.

7. CPD's Policy, History, and Review:

a. Lexipol

CPD's contracts with Lexipol²⁵ for management of department policy. Lexipol for law enforcement is a contract service comprised of legal and professional subject matter experts that continuously monitor best practices and legal changes and develop comprehensive policies. Lexipol uses a combination of agency specific content, industry best practices, state laws, and federal laws to craft policies. Each policy is customizable at the agency level, although many of the key elements are derived directly from state and federal laws. It is uncommon to modify a Lexipol policy that is sourced directly from a law. Lexipol policies are often constructed in sections, each of which can be modified.

Lexipol policy section content is divided into four basic categories:

Agency Content: generated by the agency with no Lexipol involvement or updates. An example of Agency content would be uniform regulations. There are few legal

¹⁸ California Civil Code §§ 1798.90.5–1798.90.55: ALPR data privacy and security statute for ALPR technology

¹⁹ California Government Code §§ 7284–7284.12, amended Government Code §§ 7282 and 7282.5

²⁰ Cal. Dep't of Justice, Div. of Law Enf't, Information Bulletin No. 2023-DLE-06, *California Automated License Plate Reader Data Guidance* (Oct. 27, 2023), <https://oag.ca.gov/system/files/media/2023-dle-06.pdf>.

²¹ Cal. Dep't of Justice, Div. of Law Enf't, Information Bulletin No. 2025-DLE-03, *Updated Responsibilities of Law Enforcement Agencies Under the California Values Act, California TRUST Act, and the California TRUTH Act* (Jan. 17, 2025), <https://oag.ca.gov/system/files/media/2025-dle-03.pdf>.

²² CPD Lexipol Policy 429 “Immigration Violations”

²³ CPD Lexipol Policy 450 “Automatic License Plate Readers (ALPRs)”

²⁴ CPD Lexipol Policy 812 “Records Maintenance and Release”

²⁵ Lexipol, *About Us*, <https://www.lexipol.com/about-us/> (last visited Sept. 9, 2026).

considerations for extremely specific agency items, and the department exercises full discretion over the creation of this content.

Best Practices: generated by Lexipol based off industry standards and continuously monitored and updated. Best practice is a fluid concept that balances the generally accepted method of operating for subjects that are not specifically dictated by law. There are numerous legal considerations for best practices and CPD relies heavily on Lexipol's expertise in this area. CPD does modify these items as we deem appropriate.

State and Federal Law: generated by Lexipol but sourced directly from state or federal law. In many instances these sections cite directly from specific laws with little or no discretion to deviate. Lexipol continuously monitors changes and releases updates when appropriate. CPD rarely modifies these sections save for agency specific language such as job titles or division names.

b. Automated License Plate Reader Policy:

The initiation of CPD's current ALPR program began under then Chief Matt Madden (Ret.), but the project was finalized and activated under current Chief Billy Aldridge. At some point during the project, CPD implemented Lexipol policy 449. This version of the department's ALPR policy was crafted by then Captain Greg Keeney (Ret.) in consultation with Lexipol, Motorola, the City Attorney's Office, and numerous other agencies. At that time, numerous other California agencies had a similar version of Policy 449 that CPD sourced. Policy 449 established CPD's data sharing practice and specifically outlined the methodology of exchanging ALPR data with allied agencies in bordering states and federal entities. At the time of implementation in 2023, the universal concept of cooperation between agencies to enhance public safety was paramount and legal advice at the time was that nothing expressly prohibited sharing outside of California or with federal agencies. CPD elected to adopt a conservative approach to sharing (as opposed to nationwide) and utilize a proximity methodology. California, Oregon, Nevada, and Arizona are all within each other's sphere of influence and criminal elements do not restrict activities to defined legal boundaries. The same concept was applied to federal agencies, many of which continuously operate within California.

In early 2026, Lexipol released a heavily edited version of Policy 449, to include renumbering it to policy 450. In the update, many of the detailed provisions incorporated into 449 were removed, replaced with more generalized language and adding language that was compliant with SB 34. The content pertaining to SB 34 is categorized as "state law" while the language pertaining to data sharing is categorized as "best practices." Aside from the changes regarding SB 34, Policy 449 was far superior to that of the revised 450.

Lexipol's changes for the ALPR policy were in stark contrast to CPD's existing policy, especially as it related to SB 34. This prompted staff to delve into SB 34, and CPD's data sharing policy. At that time, staff defaulted to accepting the state law provisions added to the policy by Lexipol, without modifying the agency content regarding our sharing practices. This did result in a contradiction between the SB 34 section and our data sharing practice. Over the course of the next few months, staff consulted the City Attorney's Office for legal analysis of the policy edits and SB 34. In an abundance of caution, Chief Aldridge made the decision to stop any sharing relationship that could be considered potentially out of compliance with SB 34 on July 8th, 2026. That decision did not alter the previous history of sharing, but it did unknowingly cause technical complications for future data retrieval.

c. Internal Auditing:

Senate Bill 34, California Civil Code 1798.90.51 (b)(2)(C), broadly outlines that an agency must monitor the security of information and compliance with privacy laws. The statutory auditing requirements don't specify audit frequency, methodology, who performs it, how to document it, or who reviews the results. The earlier version of Policy 449 specified that audits would be conducted "bi-annually" [449.6 (c)]. The later version of Policy 450 altered the twice per year audit to "on a regular basis" [450.6(c)].

Since the inception of the 2023 fixed ALPR system, CPD has audited the system's function, settings, MOUs, and internal use. Captain Keeney (Ret.) was the system administrator from 2023 to his retirement in July of 2024. Captain Keeney (Ret.) completed two audits in 2023 and authored a memorandum for each. Although technically still the designated administrator during the first half of 2024, Captain Keeney (Ret.) instructed Captain Struthers on the auditing process and turned over the January 2024 to July 2024 audit segment to him. Captain Struthers completed the six-month audit for January to June 2024 and from July to December of 2024 and authored memorandums for each. **No instances of misuse were discovered during these audits.** Occasional clarification was needed from users regarding searches, but none of the instances were indicative of misconduct. Typically, officers failed to provide adequate justification for their search in the designated search field of Vehicle Manager 8.0. An example of inadequate justification would be "Investigation" or the field being completely blank. Another clarification issue addressed would be an improper case number entered into the search field. An example of an inadequate case number would be entering a name or badge number instead of a recognizable case number. These clarifications were a result of misunderstanding the expectation or making a mistake.

Each of the clarification issues was addressed directly with the officers who conducted the searches and records of their clarification were retained in the audit files. After two rounds

of auditing (1 year), staff determined that a manual review of transaction logs for a six-month period was cumbersome, tedious, and allowed for too much time to transpire between inspection of the records. In 2025, Captain Struthers elected to transition to auditing usage monthly and forgo the memorandum style documentation unless misuse was identified. Although auditing more frequently, there were significantly fewer transactions to review at one time. This also allowed staff to be more thorough and interact with the officers shortly after their searches were conducted. Additionally, staff began a process of randomly spot-checking what officers entered as their justification against CPD's casefile records. staff began randomly selecting approximately 10 searches each month and traced the given case numbers to the corresponding report or call log to determine if the vehicle searched in the ALPR system was associated with that call or report.

Although this change in auditing practices drastically increased the oversight of ALPR usage, the forgoing of a memorandum summary of findings decreased my ability to easily demonstrate my efforts externally. Especially true for spot-checking as staff retained no records of which cases or how many were checked. Only instances when clarification was sought serve as proof that spot checking occurred. This became apparent when numerous Public Records Requests began seeking audit information. Although regular audit information was present, it was stored digitally in file trees that are not easily understood by an outside viewer when viewed out of context.

Overall, extensive internal auditing efforts have been continuous and **no misuse cases have ever been determined**. However, documentation of the audit process itself should be continuously improved to allow for coherent display to the public. In July of 2026, CPD developed a dual-purpose audit checklist to serve as an audit report. The first purpose is consistency so that none of the audit steps are missed. The second purpose serves to create a summary record to accompany the officer clarifications, spot checks, MOU reviews, and list of authorized users.

d. External Auditing:

As described in the internal auditing process, this effort is time consuming, tedious, takes intention, and ultimately comes down to addressing the conduct of the users. The sharing of data between agencies is done under the provision of the MOUs agreed upon by allied agencies. CPD holds no authority over the conduct of officers from another agency. The MOUs express a responsibility for CPD to govern the accuracy of our records and govern the conduct of our own CPD users. A similar responsibility is conveyed upon the allied agency. In other words, CPD will monitor our users, and outside agencies monitor their own users. Vehicle Manager 8.0 allows for the generation of reports for any of the 166 allied

agencies CPD currently allows access. Currently, there is no process for auditing those transaction records as that responsibility lives within the external agency party to the MOU. The sole recourse for misuse by an allied agency would be for CPD to sever the sharing relationship upon learning of misuse. Misuse by a single user (or more) from an allied agency is not inherently a justification for terminating the access of the entire agency. On the off chance that CPD staff routinely conducted a manual review of hundreds of thousands of transaction logs of allied agencies, they would ultimately need to report any suspicious activity to the agency responsible for the user and defer to their methods of addressing the need for clarification or misconduct. CPD has never received notification from an outside agency of misuse of records pertaining to CPD's records.