

KEY FINDINGS OF THE COMMUNITY AUDIT OF ELK GROVE POLICE DEPARTMENT'S FLOCK ALPR DATA

Flock Safety, ALPRs, and California State Law

- The Elk Grove Police Department (Elk Grove PD) operates approximately 90 Flock Safety Automated License Plate Readers (ALPRs) within the City of Elk Grove (the City).
- These artificial intelligence (AI)-powered cameras capture and analyze images of all passing vehicles, storing details including a vehicle's location, date, and time. They also capture a vehicle's make, model, color, and identifying features such as dents, roof racks, and bumper stickers, often turning these into searchable data points.
- ALPRs collect data on all vehicles that pass them, regardless of whether the driver is suspected of a crime.
- Conflicting information exists as to whether these cameras identify physical characteristics of people.
- Police search these data without a warrant.
- California Senate Bill 34 (SB 34, enacted in 2016) prohibits sharing data collected by ALPRs with federal agencies, out-of-state agencies, and private/non-governmental organizations.
- California Senate Bill 54 (SB 54, enacted in 2018) prevents California state and local law enforcement agencies from using money or personnel to "detect" persons for immigration enforcement purposes and to share "personal information" with immigration authorities.

Key Findings: How Our Travel Data are Shared and Searched

Between 2021 and March 2026, more **than 3,600 organizations made more than 8.3 million searches** of Elk Grove residents' vehicle travel data in the Flock Safety ALPR system.

Elk Grove PD performed around 260,000 out of the 8,300,000 searches. That is approximately 3% of searches. The remaining 97% of searches were by entities outside of Elk Grove ("external agencies").

Elk Grove's data were:

- Shared with more than 3,200 federal and out-of-state agencies, which searched more than 1.3 million times.
- Likely shared with U.S. Customs and Border Protection (CBP).
- Shared with Johnson County, Texas Sheriff's Office, an agency that did a nationwide search to track a woman they claimed had an abortion.
- Shared with 290 California agencies that do not have data-sharing agreements/memoranda of understanding (MOUs). These agencies searched more than 4.3 million times, even though the City of Elk Grove has assured residents that only agencies with MOUs can search our data.
- Shared with the Northern California Regional Intelligence Center (NCRIC), a Fusion Center that includes collaboration with the Department of Homeland Security (DHS) and other federal agencies. NCRIC performed more than 300,000 searches.
- Shared with Riverside County Sheriff's Office and Orange County Sheriff's Office, agencies that have illegally shared with federal agencies. The City assured residents at the March 25, 2026 City Council meeting that Elk Grove did not share with these two agencies.
- Shared with El Cajon Police Department, a California agency that refuses to stop illegally sharing with out-of-state agencies.

- Shared with private corporations and other non-governmental organizations.
- Searched by the Flock Safety company despite assurances by that company and a statement on the City of Elk Grove's ALPR website that Flock Safety does not have access to our data.
- Shared with unidentified organizations. More than 2,200 searches performed by entities with usernames such as "do not use," "Org Name," and "decommissioned org." There is no way for the City or residents to know if these searches were performed in compliance with SB 34 and SB 54.
- Searched for "people characteristics," including gender and race, by Elk Grove PD, Flock Safety, and external agencies, despite statements made by Flock Safety and the City that the cameras do not identify people characteristics.

Furthermore, all 8.3 million search reasons were redacted (erased) from the data by the City without adequate justification, despite the California Supreme Court's ruling against using blanket "investigative records" claims in general ALPR Public Records Act requests for audit logs, and despite Elk Grove PD's own training briefs stating that "Audit reasons are subject to PRA [Public Records Act] or FOIA [Freedom of Information Act] requests."

By matching unique search IDs to data from the City of Woodland's Flock logs, Elk Grove residents were able to discover the reasons for some Elk Grove searches:

- Search reasons discovered raise red flags about possible SB 34 and SB 54 violations—Elk Grove PD and external agencies used immigration enforcement terms, immigration agency assistance, federal agency assistance, and vague terms as reasons for searches.

Additional Concerns

- Recent changes to Flock Safety's Terms and Conditions (February 2026) put residents at significant risk and contradict the City and Flock Safety's public statements.
- Flock Safety's patent describes capabilities of their AI system that can identify people's gender, race, clothing, height, and weight.
- Flock Safety's public blog states, "All existing Flock LPRs will soon stream live video and capture clips with a free, optional software update. No new hardware, no permits, no extra cost." This contradicts statements made by Flock and the City of Elk Grove that ALPR cameras cannot capture video.
- Searches by DHS/ICE may not appear in audit records due to DHS policies. Elk Grove PD and residents may have no way of knowing if/when ICE searches our data.
- Flock Safety has an ongoing and substantial history of inadequate security, which should be a major red flag for City officials tasked with protecting the security and privacy of Elk Grove residents.
- Elk Grove PD's ALPR Policy does not require verification of ALPR data before taking enforcement action, despite claims made by the City at the March 25, 2026 City Council meeting.
- Posted Elk Grove PD ALPR data retention time lacks clarity.
- The City of Elk Grove accidentally released Personally Identifiable Information (PII) when responding to this public records request.
- Police chiefs and government officials in many other jurisdictions have raised significant concerns regarding Flock Safety's credibility, transparency, and contractual reliability.