

SMPD ALPR Investigation Findings

Prepared March 16, 2026

Revised April 2, 2026: Earlier PRAs searched for contracts around the August 2023 Council approval, which presented the program as a new deployment. The original Flock service agreement was signed in 2020 — outside that scope — and was not discovered until PRA W012373 [34]. Claims of "pre-contract" deployment have been corrected throughout.

Revised April 7, 2026: Added PRA W012460 [46] — city's response to a direct request for Council authorization of the 2020 Flock deployment.

Revised April 22, 2026: Updated PRA W012320 [32] — city confirmed "no responsive records" on restated search-activity-audit request. Updated PRA W012373 [34] — city confirmed the 2020 Service Agreement is the only written authorization responsive to the Nov 2022 – Aug 2023 gap period, and "no responsive records" on deployment/operation authorizations for that period.

Revised May 6, 2026: Updated PRA W012297 [28] — closed 5/6/2026, folded into W012462 without answering Item 6 (§ 5.3 monitoring mechanism). Updated PRA W012373 [34] — third consecutive non-production on Item 2; next update 5/20/2026. Updated PRA W012462 [48] — 5/5 batch produced 2022-era camera sharing notifications and vendor correspondence; formal response disclosed 211,872-document corpus at 10 hrs/week with no completion date, absorbed W012297 and W012596/W012597.

Revised May 8, 2026: Updated PRA W012462 [48] — withdrawn 5/6/2026; the disclosed 211,872-document scope (~35,000 emails/year) made the rolling production timeline impractical, and withdrawal lets the Department focus on substantive PRAs. Updated PRA W012459 [49] — 5/6 batch produced ORT grant procurement records

and disclosed C3AI as a fourth surveillance / data-integration platform. Added PRA W012693 [52] — meta-PRA seeking internal records of how SMPD handled PRA-routing decisions on 5/6. Added PRA W012686 [53] — refile of W012297 with refined scope, expressly distinguishing internal/outbound records from the withdrawn W012462 inbound-Flock email corpus.

Every factual claim below is traceable to a specific document, email, or public record. Bracketed numbers (e.g., [1]) refer to the numbered Source Documents table at the end. In the digital version, source links are clickable. In print, QR codes are provided for key sources.

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Executive Summary

A review of public records and the department's own statements identified significant gaps between SMPD's ALPR program and its representations and obligations.

Council approved 55 Flock Safety devices across two actions (August 2023 and March 2024). A 2020 service agreement for 12 cameras at \$24,000/year, signed by a lieutenant, does not appear in any Council agenda as an approval item [34]. The 2023 staff report presented the program as new without disclosing this prior relationship [8]. The department's Flock Camera Manager reports 80 devices [20]. For over a decade, the department represented its ALPR program as regularly audited and compliant with policy. No record of any audit or compliance activity exists prior to December 2025 [11].

This document presents eight findings across seven sections, grounded in the department's own records and statements. The findings do not argue for or against the ALPR program. They compare the department's documented commitments against its documented actions.

Key Findings

1. **283 agencies listed as having access — scope inconsistent with policy and statute.** The 2023 staff report told Council that SMPD shares with NCRIC and "allied County law enforcement agencies." As of February 2026, the Flock transparency page listed 283 organizations statewide, including University of the Pacific — a private university whose own Chief of Police confirmed it is not a public agency. UOP was removed from SMPD's list after a resident raised the issue (see §6).
2. **No documented audits for 13+ years.** Policy 462/463 required audits "as described in SOP 205." SOP 205 specified quarterly operator audits across all platforms and quarterly end-user audits for NCRIC — including review of search justifications and case number entries. The end-user audit criteria were never extended to Flock (see §1). O'Keefe confirmed no audit records of any kind exist before December 2025. She stated audits occurred through "roundtable discussions," but a PRA for meeting records returned no responsive documents. The audits that began in December 2025 review sharing configuration, not search activity compliance. A subsequent PRA specifically requesting search activity records confirmed these are the only audits that exist (see §1). [32]
3. **Vendor contract authorizes sharing beyond what SMPD policy permits.** Contract § 5.3 grants Flock independent authority to disclose SMPD footage to law enforcement, government officials, and third parties — without SMPD approval or notification. No policy or audit process would surface a disclosure made under this provision (see §5).
4. **Statutory compliance: 1 of 11 required elements fully met; 4 partially addressed.** Comparison of Policy 463 and SOP 205 against § 1798.90.51 (operator) and § 1798.90.53 (end-user) obligations found 1 fully addressed, 4 partially addressed, and 6 non-compliant or in structural conflict. (See Appendix B; see §1–7.)
5. **AG Bulletin 2023-DLE-06 guidance not followed.** In October 2023, the Attorney General issued guidance for all California agencies to review vendor contracts for SB 34 compliance, conspicuously post ALPR policies, and address audit deficiencies. SMPD's first documented compliance activity occurred over two years later. Three of six items were not followed; three were partially addressed (see §1–7).

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6. **All compliance activity occurred within approximately four months — and remains incomplete.** (See [§7](#), [§2](#).)
 7. **Non-ALPR surveillance operates with no policy framework.** Of the department's 68 Flock devices, 14 lack ALPR capability — including 10 privately-owned community cameras. At multiple locations, edge computing hardware paired with ALPR cameras converts the same feed into live video — producing ungoverned surveillance data alongside governed ALPR data. These devices are absent from all contracts. The department also operates Verkada cameras under a separate contract with no identified surveillance policy. The City does not have the surveillance technology ordinance recommended by the 2016–2017 Civil Grand Jury (see [§4](#)). [\[20\]](#) [\[24\]](#)
 8. **No public record of who accesses SMPD's surveillance data.** City policies require documented approval processes and audit logs for external agency access. In practice, all sharing decisions are made within the Flock platform — a private system not subject to the California Public Records Act. When the platform does maintain logs, the city denies their release under blanket ALPR exemptions. When it doesn't, no record exists at all. No entity in the chain maintains a retrievable public record of who has accessed public surveillance data, or when access was granted or revoked (see [§6](#), [§2](#)). [\[32\]](#) [\[26\]](#)
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1. Audit Compliance

Requirement	CA Law	AG Bulletin	SOP 205	Policy 463	Compliance	City Audits
Audit frequency	"Periodic"	Address State Auditor findings	✓ Quarterly [§205.5.1]	✓ Monthly internal, quarterly external [§463.10]	▲ Monthly since Dec 2025; sharing configuration only — search activity not reviewed [11] [17]	▲ Matches 463 frequency; scope limited to sharing settings, not SOP 205 search compliance criteria
Audit reporting chain	—	—	Support Services Captain [§205.5.1]	Chief of Police [§463.10]	▲ Chief of Police [17]	▲ Matches 463; not submitted to Support Services Captain per SOP 205
Audit scope	All ALPR systems	—	▲ Operator audits: all platforms. End-user audits: NCRIC only — no end-user audit requirement for Flock [§205.5.1]	✓ Flock only [§463.10]	▲ Flock sharing configuration only; search activity, access logs, and case number compliance not reviewed [17]	▲ No end-user audit conducted for any platform
Committee structure	—	—	Steering Committee + Subcommittee [§205.7]	ALPR Committee Captain [§463.2.1]	▲ "Flock Committee" — not in SOP [11]	✗
Annual SOP review	—	—	Required [§205.6]	—	✗ No review documented [15]	✗
User offboarding	Required [§.51(a)]	—	✗ Not addressed	✗ Not addressed	✗ No process described [3]	✗
Community cameras	End-user obligations [§.53]	Determine status	✗ Not addressed	✗ Not addressed	✗ 10 cameras accessed, no policy [20]	✗

- Policy 462/463 required ALPR audits "on a regular basis, as described in SOP 205" [1, §462.6(c)] [3, §463.6(c)]. SOP 205.5.1 specified quarterly end-user audits for the NCRIC platform and quarterly operator audits across all platforms including Flock [4, §205.5.1]. The end-user audit criteria — case number entry, connection between searched data and justification — apply only to NCRIC, which the department confirmed it no longer uses [21]. No equivalent audit requirement exists for Flock search activity, despite the SOP describing that Flock stores this data.
- The annual SOP reviews required by §205.6 — none of which were conducted [15] — should have identified that the end-user audit requirement still references NCRIC, a platform the department abandoned when it adopted Flock. The SOP was updated in February 2021 to add Flock-specific platform descriptions but did not extend the end-user audit requirement to cover it [4] [21].
- SMPD presented to Council on September 1, 2020 (File ID: 20-3547) that "SMPD conducts regular audits to ensure access to the ALPR Databases are within policy" [7]. No audits were conducted [11].
- Kelly O'Keefe confirmed February 10, 2026 — five years after that representation — that "We do not have any records of audits prior to December [2025]." [11]

- O’Keefe stated February 12 that prior audits consisted of “roundtable discussions with the Flock Committee” that “were not memorialized in standalone records” [11]. The department’s own Flock Questions response uses different language: audits were “conducted informally” [17]. Neither characterization is consistent with SOP 205.5’s requirement — in place since at least October 2019 [4, §205.5] — that quarterly audit results be submitted to the Support Services Captain.
- A PRA for records of these roundtable discussions produced three calendar entries across five years [14]. “No records responsive” for minutes, agendas, notes, or summaries. Of the two meetings with attendee lists, none included the Support Services Captain — the person responsible under SOP 205 [4] for receiving audit results [15].
 - **April 23, 2024** — “ALPR Committee Meeting.” Attendees: Trujillo, Leung, Venikov, Lethin, Goshin.
 - **February 25, 2025** — “LPR meeting.” Organizer: Trujillo. SMPD Classroom. No attendee list.
 - **March 6, 2025** — “ALPR/RTIC Meeting for S. Leung.” Attendees: Leung, Goshin. Chief’s conference room.
- First formal audit records: December 2025 [11]. Thirteen years after the department’s first ALPR policy. Over three years after the first Flock cameras were invoiced [20]. Twenty-eight months after Council approved the program and the contract was executed.
- Policy 463.10, added December 2025, requires monthly internal audits and quarterly external audits of Flock, documented via memorandum to the Chief of Police. [3, §463.10]
- The monthly audit memos follow the 463.10 framework [17]: they cover Flock only and are addressed to the Chief. No audits have been submitted to the Support Services Captain under SOP 205.5.1 [4, §205.6] — not before December 2025, and not after [15]. The two frameworks have not been reconciled.
- The first audit memo under 463.10 (dated December 19, 2025) retroactively reviewed November sharing configuration [17]. No retroactive review of search activity or external agency access was conducted for any prior period [3, §463.10].
- The audit memos confirm the department reviews sharing settings — the January 2026 memo verifies “Revoke Out-of-State Sharing” is selected. [17]
- A PRA specifically requesting search activity compliance records — distinguished from sharing configuration audits — returned “no records responsive.” The department identified the sharing configuration memos as “all audit records maintained by the Department” [32]. On April 22, 2026, the city restated the full request and responded “At this time there are no responsive records to your request” [32]. No search activity compliance audit has ever been conducted.
- The Flock transparency page listed University of the Pacific — a private institution — among the 283 entities with access to SMPD data [10]. California Civil Code § 1798.90.55(b) permits ALPR sharing only with public agencies [12] (see §6 for entity-type analysis).
- To determine whether UOP qualifies as a “public agency,” records requests were sent to three entities. SMPD’s PRA produced no records of any entity-type review [16]. Stockton PD — UOP’s local law enforcement agency — confirmed it performed no legal review; authorization consists of clicking “agree” in the Flock platform [27]. UOP’s Chief of Police responded to a CPRA by confirming that “University of the Pacific is a private institution and therefore not subject to the CPRA” [29].
- The access list [10] includes 10 District Attorney offices, 11 campus police departments, and 4 state agencies. Policy 463.2 limits program purposes to patrol-related activities [3]. No policy defines what purposes external agencies may query SMPD data for. The audit memos do not review entity types or authorized purposes for external agencies [17].

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- State law requires "reasonable security procedures" to protect ALPR information from unauthorized access [12]. Neither Policy 463 [3] nor SOP 205 [4] addresses user account management — no process for revoking access when personnel leave, no authentication requirements specified. The audit memos do not review user offboarding [17].
 - The department accesses data from 10 privately-owned community cameras through Flock's "Community Camera Full Access" feature [20] [5, Exhibit A]. It does not own or control these cameras. The audit memos review only "our" cameras and "our" users [17]. Under § 1798.90.53 [12], SMPD's obligations as an end-user apply to all ALPR data it accesses — including data from cameras it does not own.
 - SOP 205.6 requires the Support Services Captain to review the SOP itself on an annual basis [4, §205.6]. A PRA for records of annual reviews produced no responsive documents [15]. Three SOP versions exist: October 2019, February 2021, and November 2025 [19]. The November 2025 version changed only the copyright timestamp — the substantive content has been unchanged for nearly five years.
 - SOP 205 still references Policy 462, which was renumbered to 463 in January 2023 [2], and describes audit procedures for four platforms the department confirmed it no longer uses [21]. Three annual SOP reviews between the renumber and December 2025 [15], and the November 2025 copyright refresh [4], left these stale references uncorrected.
 - SOP 205.7 establishes two oversight bodies [4, §205.7]: an ALPR Steering Committee (Support Services Captain, Communications and Records Manager, Traffic Lieutenant, Investigations Lieutenant) and an ALPR Subcommittee (Investigations Sergeant, Traffic Sergeant, Police IT Senior Systems Analyst). No records of either committee have been produced. O'Keefe referenced a "Flock Committee"—a body not described in SOP 205.
 - The city produced "no records responsive" to a PRA requesting quarterly end-user audits and quarterly operator audits [15]. Four individuals served as Support Services Captain during the relevant period — each responsible under SOP 205.5.1 [4, §205.5.1] for receiving quarterly audit submissions. None received any.

2. Transparency

Requirement	CA Law	AG Bulletin	SOP 205	Policy 463	Compliance
Policy posting	Conspicuous posting [§.51(b)(1)]	Manual inclusion may not satisfy	—	✗ No posting requirement	✓ In manual since ~2020; standalone link Dec 2025 [11]
SOP posting	Conspicuous posting [§.51(b)]	—	✓ Required [§205.1]	—	✗ Never posted [15]
Job titles	Required [§.51(b)(2)(B)]	—	—	✗ "Members" / "designee" only [§463.4(d)]	✗ In internal PRA response only [16]
Sharing records	—	Review vendor agreements [18]	—	—	✗ Maintained exclusively by Flock; not subject to PRA [16] [27]

- Both state law and SOP 205 itself require conspicuous public posting. SOP 205.1: "This Operating Procedure, along with SMPD Lexipol Policy 462, shall be posted conspicuously on our Department website" [4, §205.1]. State law requires the same [12]. Every version of the posted ALPR policy delegates audit procedures, training requirements, and data collection processes to SOP 205 [1] [2] [3].
- SOP 205 is not posted on the department website. The city acknowledged on March 3, 2026: "The Department does not currently have the associated SOPs posted on its website. We acknowledge this oversight and are actively working to ensure the SOPs are published as soon as possible." As of April 2, 2026, it remains unavailable [19] [33]. A member of the public reading the posted policy cannot access the document it cites [4].
- State law requires the published policy to list job titles of employees authorized to use or access the ALPR system [12]. Policy 463 uses only "members" and "authorized designee" [3]. SOP 205 names oversight committee roles [4, §205.7] but not authorized users — and is not publicly posted regardless. The only document listing authorized user titles (Officers, Crime Analysts, Dispatchers, CSOs) is an internal PRA response [17], not a published policy.
- The August 2023 staff report presented to Council stated that SMPD shares with NCRIC and "allied County law enforcement agencies." The 283 agencies with access to SMPD's ALPR data are not disclosed in any city document or council report [8] — they are discoverable only through the Flock transparency page for San Mateo [10].
- The Flock transparency page for San Mateo listed 68 devices as of February 18, 2026 [10]; reduced to 66 after the department asked Flock to remove 2 decommissioned units [21]. The department's Camera Manager reports 80 [20]. The difference includes 12 Picard devices — AI edge computing hardware that does not appear in any invoice, contract, amendment, or council presentation [5] [6].
- The 12 Picard devices are edge computing hardware paired with ALPR cameras at the same locations. They convert the ALPR camera feed into live video — producing ungoverned surveillance data alongside governed ALPR data. Neither the devices nor the video feeds appear on the public transparency portal [20].
- The department's internal inventory lists 10 privately-owned community cameras [20] whose data SMPD accesses through Flock's "Community Camera Full Access" feature [5, Exhibit A]. No public notice of this access has been identified.

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- Sharing agreements that determine which agencies access SMPD's ALPR data are maintained exclusively by Flock. O'Keefe stated the approval process "is completed within the Flock platform." Flock is a private company. These records cannot be obtained through public records requests to any government agency. [\[16\]](#)
 - This was confirmed independently through the UOP investigation. When a PRA to Stockton PD asked whether it had vetted UOP's status as a public agency before granting access, Stockton's records custodian responded: "All of the paperwork is created and kept by Flock. We do not retain or have any copies." Stockton's entire authorization process: clicking "agree" when requested by another department. [\[27\]](#)

3. Council Representations

Topic	Staff Report	Documented Reality
Audits	"Conducts regular audits" (2020 study session) [7]	No audit records before Dec 2025 [11]
Standards	"Strictest industry standards" (2023 staff report) [8]	No audits at the time [11]
Data retention	"Raw LPR data is not stored or retained" [8]	30-day retention in contract; SOP describes data storage [5]
Sharing scope	"NCRIC and allied County agencies" [8]	283 agencies statewide [10]
Devices	"40 LPRs, to be deployed" (2023) [8]; "+15 automated license plate readers" (2024) [9]	40 included cameras already operating since 2020 [34] (see §4 device count timeline).
Capabilities	Not disclosed in staff report [8]	Statewide/nationwide network, community cameras, Vehicle Fingerprint, audio [5, Exhibit A]
Council approval date	"City council approval...in 2020" (audit memo) [17]	Flock activity began in 2020 (informational presentation June 2020 [40]; service agreement signed Aug 2020 [34]), but no Council vote or approval action appears in council records until Aug 2023 [8]. The June 2020 staff report's budget impact section states "there is no budget impact as a result of this informational item" [40]. When asked directly for any Council vote, resolution, or motion authorizing 2020 Flock use, the city produced only that informational presentation [46]
Prior Flock relationship	Not disclosed [8]	2020 service agreement (12 cameras, \$24K/year) signed by Lt. Mefford; does not appear in Council agendas as an approval item [34]; by Jan 2022, 22 cameras deployed — exceeding the contract's 12 [35]; 2023 staff report presented program as new
2020 presentation	2023 staff report	
"Through the San Mateo County Police Chiefs and Sheriffs Association, staff became aware of equipment and technology provided by Flock Safety"	"Through the San Mateo County Police Chiefs and Sheriffs Association, staff became aware of LPR technology provided by Flock Safety"	
"Flock System leases a turnkey system...at a cost of approximately \$2,000 per unit, per year"	"Flock leases a turnkey system...at a cost of approximately \$2,500 per unit, per year"	
"areas vulnerable to property crimes and gang-related activity"	"areas vulnerable to property crimes and gang-related activity"	
"Raw, unprocessed ALPR data is not stored or retained by SMPD. We utilize the strictest industry standards"	"Raw LPR data is not stored or retained by SMPD. Staff utilizes the strictest industry standards"	
"We have a records sharing agreement with [NCRIC], along with all of the other allied County law enforcement agencies"	(identical)	

- During the September 1, 2020 Study Session on Police Accountability (File ID: 20-3547), SMPD presented to Council that "SMPD conducts regular audits to ensure access to the ALPR Databases are within policy" [7]. Kelly O'Keefe confirmed February 10, 2026 that no audit records exist prior to December 2025 [11].
- The August 21, 2023 agenda report (File ID: 23-7622) stated "Staff utilizes strictest industry standards with respect to how data is accessed and by whom" [8]. No documented audits were being conducted at the time [11]. No process for approving external agency access existed [16]. No user offboarding process was in place [3] [4]. Department policy only provided for end-user access audits of the NCRIC platform, not Flock [4, §205.5.1].
- The same report stated "Raw LPR data is not stored or retained by SMPD." The Flock contract specifies a 30-day retention period [5, Exhibit A]. SOP 205 describes in detail how each ALPR platform stores license plate data, photos, and video footage on SMPD's behalf [4, §205.5.1]. [8]
- The August 2023 staff report (File ID: 23-7622) presented to Council stated that SMPD has "a records sharing agreement with the Northern California Regional Intelligence Center (NCRIC), along with all of the other allied County law enforcement agencies" [8]. The Flock transparency page lists 283 organizations with access statewide [10] — only 14 are San Mateo County agencies.
- In June 2020, Flock was introduced as an informational item — with no approval on the record — to Council Members Goethals, Rodriguez, Bonilla, Lee, and Papan [40]. In August 2023, the \$501,350 MSA was placed on the consent calendar (Agenda Item 13, File ID: 23-7622) and presented as a new program to Council Members Lee, Diaz Nash, Hedges, Loraine, and Newsom [8]. Of the five members, only Lee was present for both [40] [8]. The 2023 staff report did not disclose the existing contract [34], the three-year operational history, or that the program had already grown beyond its original 12-camera scope [35].
- A prior Flock Service Agreement had been signed by Lt. Todd Mefford on August 17, 2020 — 12 cameras at \$24,000/year [34]. Council received an informational presentation about the planned deployment on June 1, 2020 [40]. Meeting minutes from June 15 note that Council "provided comments in support of the programs and asked that it be brought back to report to Council after a year" [40]. A review of council agendas between June 2020 and August 2023 found no dedicated Flock report-back. Subsequent references were limited to brief progress notes in goal-setting packets: budget confirmation in March 2021, and "22 Flock ALPRs deployed...resulting in 123 cases where police action was initiated" in January 2022 [35]. The next Flock-specific agenda item was the August 2023 MSA — three years later.
- The 2023 staff report described forty cameras "to be deployed" — future tense, as if no Flock cameras were yet in operation [8]. The report's background section was largely copied from the June 2020 informational presentation [40], with minor edits:
- The staff report also did not disclose [8] that the attached contract included statewide and nationwide network lookup access, community camera full access, Vehicle Fingerprint search capabilities, direct sharing with surrounding jurisdictions, or audio detection (referenced in MSA recitals) [5, Exhibit A and Recitals].

- O’Keefe’s confirmed count of 54 ALPR cameras (40 MSA + 13 Amendment + 1 Flex) leaves no room for the original 12 as additional units [21]. The 12 cameras from the 2020 agreement were absorbed into the 40-camera MSA [20] [34]. By January 2022, 22 cameras had been deployed — 10 more than the 2020 contract’s 12-camera scope [35]. No amendment or additional authorization has been produced for the expansion beyond 12. A PRA specifically asking for any contract, agreement, MOU, or written authorization in effect between the first Flock invoice (November 12, 2022) and MSA execution (August 25, 2023) identified the 2020 Service Agreement as the only responsive record [34]. INV-10888 (\$30,000 for 12 Falcon cameras, billing period beginning November 12, 2022) and INV-13720 (\$500 "Camera Replacement," April 2023) were both paid before the MSA was executed [20].
- Seven Flock invoices totaling \$12,872 have no associated purchase order — including the \$500 "Camera Replacement" charge dated April 2023. [20]
- Amendment No. 1 (March 2024, File ID: 24-8392, Consent Calendar) described 15 additional devices as "automated license plate readers." The order form lists 13 ALPR and 2 non-ALPR devices. Flock’s own Camera Manager classifies the two Condor devices as "Video Camera," not LPR [20]. The staff report does not mention "video," "surveillance," "PTZ," or "Condor" [9]. Council’s prior ALPR representations — audits, standards, sharing restrictions — do not apply to non-ALPR devices [6, Exhibit C].
- The December 2025 audit memo states: "The San Mateo Police Department obtained city council approval for the use of Flock Automated License Plate Readers in 2020" [17]. Council received an informational presentation about Flock in June 2020 [40], and the department signed a service agreement in August 2020 [34]. No Council vote or approval action appears in Council agendas or minutes for that period; the agreement was signed by a lieutenant. The September 2020 study session [7] mentioned ALPRs but was not a Flock-specific agenda item. Council records indicate the first Flock vote was August 2023 [8].
- PRA W012460 asked the city directly for "any record of a City Council vote, resolution, or motion authorizing the use of or expenditure on Flock Automated License Plate Readers in 2020." The city produced only the June 1 agenda report and the corresponding meeting minutes [46]. The agenda report’s recommendation section reads "Review and provide feedback." Its budget impact section states: "There is no budget impact as a result of this informational item." No vote, resolution, or motion authorizing Flock was produced.
- PRA W012459 asked the city directly for the report-back Council requested in June 2020 ("after a year of experience with these programs") — specifically any "report, presentation, memorandum, or agenda item prepared in response to this request, from June 1, 2020 to present" [49]. The city produced the same strategic-plan and goal-setting packet excerpts already cited here — brief bullet-list mentions in March 2021 [49], January 2022 [35], and similar updates through 2024 — and the August 2023 MSA packet [8]. No standalone report or dedicated agenda item was produced. The March 15, 2021 Strategic Plan Draft Review disclosed that \$50,000/year for "Flock fixed ALPR" was already "incorporated into FY 2021-22 Budget" [49] — more than double the \$24,000/year scope of the 2020 service agreement [34], consistent with the 22-camera deployment reported to Council in January 2022 [35].

4. Device Inventory & Non-ALPR Governance

Date	Source	Count	Notes	Ref
Aug 2020	Flock Service Agreement	12	Original contract scope	[34]
Jan 2022	Council goal-setting packet, p. 7	22	Progress update: "22 Flock ALPRs deployed" — 10 beyond contract scope	[35]
Aug 2023	Staff report / MSA order form	40	"forty LPRs, to be deployed" — presented as new; absorbed the existing 12 (31 Falcon + 9 Falcon)	[8] [5]
Mar 2024	Amendment No. 1 order form	+15	Described as "15 automated license plate readers"; actually 13 LPR + 2 Condor video cameras	[9] [6]
—	Contracted total (MSA + Amendment)	55	53 ALPR + 2 non-ALPR	[5] [6]
Jan 2026	Flock Questions response	31	"none of its 31 cameras have statewide or national lookup capabilities enabled"	[17]
Feb 2026	O'Keefe spreadsheet (PRA)	60	Active devices listed	[20]
Feb 2026	O'Keefe email	68	54 LPR + 14 non-ALPR; 2 decommissioned = 66 active	[21]
Feb 2026	Flock transparency portal	68	Captured Feb 18 before department requested adjustment	[10]
Mar 2026	Flock transparency portal	66	After department asked Flock to deduct 2 decommissioned units	[21]
Feb 2026	Flock Camera Manager (PRA)	80	78 healthy + 2 offline; includes 12 Picard + 1 Avicore not in any contract	[20]

- O'Keefe confirmed February 23, 2026 that the department operates 68 Flock devices, of which 14 do not have ALPR technology. Two were decommissioned, leaving 66 active. O'Keefe stated they would be "deducted from the transparency site by Flock" [21]. The Camera Manager dashboard shows 2 devices offline — consistent with the 2 decommissioned units [20].
- Flock Camera Manager screenshots produced via PRA W012201-022326 report 80 total devices (78 healthy, 2 offline) — 12 more than O'Keefe's count. [20]
- The 12 additional devices are identified in Camera Manager as "Picard." A thirteenth device not in O'Keefe's spreadsheet is identified as "Avicore." Neither device type appears in the original contract [5, Exhibit A], Amendment No. 1 [6, Exhibit C], or any publicly available procurement document. [20]
- Picard devices are co-located with LPR cameras at multiple sites. The PRA spreadsheet lists Picard IDs in the "Live Feed" column next to their paired cameras — the Picard provides the video feed. Each paired location produces both ALPR data and non-ALPR video data. Policy 463 and SB 34 govern the ALPR data. Nothing governs the video. [20]

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- The Flock contract [\[5, Exhibit A\]](#) and amendment [\[6, Exhibit C\]](#) account for only 2 non-ALPR devices (the Condor PTZ cameras).
 - O'Keefe stated there was "no contract for the additional cameras" and that "the cost was below the threshold requiring a new contract." [\[22\]](#)
 - No department policy governs video surveillance cameras. Policy 462/463 and SOP 205 cover ALPRs only. SB 34 applies only to ALPR data. Flock's own contract categorizes Condor cameras as "Video Products." Data retention, access controls, sharing, and auditing of non-ALPR camera data are unaddressed [\[1\]](#) [\[3\]](#) [\[4\]](#) [\[6, Exhibit C\]](#).
 - The 2016-2017 San Mateo County Civil Grand Jury found that no jurisdiction in San Mateo County had enacted any ordinance governing acquisition, use, or data management of surveillance technology (Finding F2), and recommended all agencies bring such a policy before their governing body by December 31, 2017 (Recommendation R3). [\[24\]](#)
 - San Mateo did not adopt an ordinance in response. A review of the San Mateo Municipal Code (current through February 2026) identified no such ordinance. Council Member Nicole Fernandez confirmed in a July 2025 news report: "We don't have a CCOPS ordinance." [\[25\]](#)
 - By contrast, at least eight other California jurisdictions have adopted surveillance technology ordinances since 2016: [Santa Clara County](#) (2016), [Berkeley](#) (2018), [Oakland](#) (2018), [Davis](#) (2018), [Palo Alto](#) (2018), [San Francisco](#) (2019), [San Diego](#) (2022), and [BART](#) (2018).

5. Vendor Disclosure Authority

Requirement	CA Law	AG Bulletin	Policy 462/463	Contract	Compliance
Pre-approval process	—	—	Required for external agencies [§462.8(a)] [§463.8]	—	✗ No documented process; no approval records produced [16]
Sharing restricted to public agencies	Public agencies only; non-public prohibited [§.55(b)]	State or local only [18]	✓ CA public agencies only [§463.8]	—	✗ Private university on access list; does not qualify under §.5(f) [10]
Vendor agreement review	—	Review contracts for non-public access provisions [18]	✗ Not addressed	§ 5.3 authorizes disclosure to non-public entities [5]	✗ No evidence of review; § 5.3 remains in contract [6]
Vendor disclosure authority (§ 5.3)	Non-public sharing prohibited [§.55(b)]	—	✗ Not addressed	Flock discloses independently to third parties [5]	✗ No process to detect disclosures [17]
Vendor notification to SMPD	—	—	—	Not required [5]	✗ Not addressed in audits [17]
Survival of terms	—	—	—	§ 5.3 survives termination [5]	✗ Not addressed [3]

- Policy 462.8 (2012–December 2025) required that external "Agency members accessing ALPR data are subject to a pre-approval process by SMPD and the database management administration" [1, §462.8(a)]. Policy 463.8 (December 2025–present) restricts sharing to California public agencies only, reviewed by the ALPR Committee Captain, and explicitly excludes out-of-state and federal agencies [3, §463.8].
- Flock MSA § 5.3 authorizes Flock to independently "access, use, preserve and/or disclose the Footage to law enforcement authorities, government officials, and/or third parties" based on Flock's own "good faith belief" that disclosure is "reasonably necessary." This includes disclosures to comply with legal process, enforce the agreement, or address "security, privacy, fraud or technical issues, or emergency situations." No SMPD approval, notification, or involvement is required. [5, §5.3]
- This authority is not incidental to data hosting. § 4.1 provides that SMPD retains ownership; § 5.2 permits only anonymized data use. § 5.3 applies to identifiable "Footage" — defined in the contract as "still images, video, audio and other data." The scope covers everything the cameras capture [5, §1.10]. [5, §5.3] [5, §4.1] [5, §5.2]
- § 5.3 contains no requirement that Flock notify SMPD before or after a disclosure. The department's monthly audit memos review dashboard sharing settings and user access [17]; none reference vendor-initiated disclosures under § 5.3 [5, §5.3].
- MSA §7.3 provides that Section 5 (including §5.3) survives termination of the contract. Flock retains this disclosure authority even after the agreement ends, for any footage still within the retention period. [5, §7.3]
- §5.3 was not disclosed in either the August 2023 staff report (File ID: 23-7622) or the March 2024 amendment staff report (File ID: 24-8392). Neither report mentioned that the contract grants the vendor independent authority to disclose SMPD surveillance data to third parties [8] [9].
- The original MSA (August 2023) was signed by Chief Barberini and Flock's General Counsel. No city attorney signature appears on the original MSA [5, signature page]. Two months later, the AG Bulletin guided agencies to review vendor agreements for exactly this kind of provision [18]. Amendment No. 1 (March 2024) added city attorney review [6, signature page] — but did not modify § 5.3.

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- A PRA requesting legal analysis of whether § 5.3 is consistent with § 1798.90.55(b) was denied under attorney-client privilege [28]. The privilege claim confirms a legal assessment of § 5.3 exists. Its conclusions have not been made public.
 - The December 2025 policy revision tightened data sharing to California-only agencies [3, §463.8] but did not address the contract provision that authorizes Flock to disclose outside those restrictions [5, §5.3].
 - SB 34 [12] prohibits public agencies from sharing ALPR information with non-public entities (§ 1798.90.55(b)), with an exception for data hosting. § 5.3 authorizes Flock to independently disclose beyond the hosting function. SB 34 does not directly regulate the vendor's subsequent use of data it holds as a host [5, §5.3].

6. Network Sharing

Requirement	CA Law	AG Bulletin	Policy 463	Staff Report	Compliance	City Audits
Authorized recipients	Public agencies only [§.55(b)]	No out-of-state or federal	✓ CA public agencies only [§463.8]	"NCRIC and allied County agencies" [8]	✗ 283 agencies statewide [10]	✗
Entity type	Public agencies [§.55(b)]	State or local only	✓ Public agencies [§463.8]	—	✗ Private university on list; not a public agency under §.5(f) [10]	✗
Approval process	—	—	ALPR Committee Captain review [§463.8(b)]	—	✗ No documented process; no approval records produced [16]	✗
Written agreements	—	—	Required [§462.8(b)–(c)]	—	✗ No records produced [16]	✗
Training (external)	—	—	"Shall ensure" [§463.9]	—	✗ "We do not retain records" [16]	✗
Network governance	—	Review vendor agreements	✗ Not addressed	—	✗ Not addressed in any policy [5, Exhibit A]	✗
Out-of-state/federal	Prohibited [§.55(b)]	Prohibited	✓ Excluded [§463.8]	—	▲ Direct sharing disabled; El Cajon (sued by AG for out-of-state sharing) has access [17]	▲
NCRIC re-sharing to non-conforming entities	Public agencies only [§.55(b)]	—	✗ Not addressed	—	✗ NCRIC MOU §9 allows NCRIC to re-share SMPD data without approval; NCRIC's own portal lists entities that may not qualify under §.5(f) [36]	✗

- The August 2023 staff report (File ID: 23-7622) presented to Council stated that SMPD has "a records sharing agreement with the Northern California Regional Intelligence Center (NCRIC), along with all of the other allied County law enforcement agencies." [8]
- As of February 18, 2026, the Flock transparency page for San Mateo lists 283 organizations with access to San Mateo ALPR data. The list spans the entire state, from Yuba County to San Diego, and includes agencies in Imperial, Kern, Los Angeles, Riverside, and Orange counties — beyond "allied County law enforcement agencies." [10]
- The list includes El Cajon PD [10], which is currently being sued by the California Attorney General for refusing to stop sharing ALPR data with out-of-state agencies in violation of SB 34 [13].

- NCRIC appears on SMPD's Flock transparency portal as a sharing partner [10]. SMPD's NCRIC Memorandum of Understanding (August 2014) grants NCRIC authority to "execute information sharing agreements with new Member Agencies and to incorporate new information sharing systems into the NCRIC-DSP" without "further review or approval by member agencies" [36, 89]. SMPD has not exercised its right to restrict NCRIC's re-sharing [36]. As of March 27, 2026, NCRIC's own Flock transparency portal lists 318 organizations it shares with, including University of the Pacific and University of San Francisco — both private institutions that do not qualify as public agencies under § 1798.90.5(f) [12] [37]. UOP is the same entity previously flagged on SMPD's direct sharing list (see above).
- SMPD's ALPR data can reach non-conforming entities through two independent delegation mechanisms — Flock MSA § 5.3 (see §5) and NCRIC MOU § 9 — neither of which requires SMPD approval or notification. SOP 205.5.1 required quarterly end-user audits specifically for NCRIC, including review of search justifications and case number entries [4, §205.5.1]. No such audits were conducted (see §1).
- California Civil Code § 1798.90.55(b) prohibits sharing ALPR data "except to another public agency." § 1798.90.5(f) defines "public agency" as "the state, any city, county, or city and county, or any agency or political subdivision" thereof. [12]
- NCRIC is not a city, county, or state agency, and does not appear to be a political subdivision. It is a fusion center with significant federal ties [41] [42]:
 - Created in 2007 by the NC HIDTA Executive Board — not by statute or executive order. It has no charter, enabling legislation, or founding legal instrument [41].
 - Housed in the Phillip Burton Federal Building (GSA-managed federal space) in San Francisco [41].
 - Funded primarily through federal sources: the White House ONDCP, DHS grants via Cal OES, and Bay Area UASI funds. No public budget has been disclosed. GAO found DHS could not accurately account for federal funding to fusion centers [41].
 - Governed by an 18-member board — 9 federal (ATF, DEA, FBI, IRS Criminal Investigation, U.S. Marshals, DHS, Postal Inspection, U.S. Forest Service, U.S. Attorney NDCA) and 9 state/local (including San Mateo County DA and Sheriff) [42].
 - Operates under 28 CFR Part 23, a federal regulation governing federally funded criminal intelligence systems [41].
 - NCRIC's Flock transparency page states it will not share ALPR data with "federal law enforcement" [37]. Federal law enforcement agencies hold half the seats on its governing board [42].
 - NCRIC's Flock sharing list includes University of the Pacific, Stanford University, and University of San Francisco — all private institutions [37]. If NCRIC is a public agency under § 1798.90.5(f), this sharing is prohibited by § 1798.90.55(b) [12].
- San Mateo's sharing list includes NCRIC [10]. If NCRIC is not a public agency under § 1798.90.5(f), this sharing is prohibited by § 1798.90.55(b) [12].
- San Mateo's sharing list included University of the Pacific, a private university in Stockton. It is not a state agency, political subdivision, or public institution. It does not qualify as a "public agency" under § 1798.90.5(f). Its inclusion on SMPD's access list is inconsistent with § 1798.90.55(b). Neither SMPD nor Stockton PD produced any record of a public agency determination. A follow-up PRA explicitly asking Stockton PD for a determination under Gov. Code § 6252(a) confirmed: "there is no written documentation regarding any agreement with Stockton PD and UOP PD," and "most likely the flock administrator who gave the authorization is no longer here" [38]. UOP's own Chief of Police confirmed it is "a private institution and therefore not subject to the CPRA" [29]. [10] [12] [27] [38]

- UOP was present on SMPD's Flock transparency portal as of February 18, 2026 [10]. As of March 11, it had been removed [30]. The removal was not flagged by any audit and was not communicated to the requestor who raised the issue. Stockton PD's portal still lists UOP [30].
- The department cited § 1798.90.55(b) to deny a resident's request for their own vehicle's ALPR records [26] and to withhold aggregate search compliance data from the public [32]. The same statute prohibits sharing ALPR data with non-public entities [12]. University of the Pacific — a private institution — had access to SMPD's ALPR data during this period [10].
- The access list includes 10 District Attorney offices, 11 campus police departments, and 4 state agencies. Policy 463.2 limits the program to identifying stolen vehicles, suspect interdiction, warrant service, and stolen property recovery. § 463.4(b) broadens use to "any routine patrol operation or criminal investigation" — but that section applies to "Department members," not external agencies. No policy defines what purposes external agencies may query SMPD data for [3] [4]. [10]
- The Flock contract includes "State Network (LP Lookup Only)" and "Nationwide Network (LP Lookup Only)" as standard FlockOS features. Neither Policy 462/463 [1] [3] nor SOP 205 [4] addresses how these network sharing features are governed, audited, or restricted. [5, Exhibit A]
- For regional context: Mountain View PD discovered in January 2026 that approximately 240 agencies had access to its ALPR data — against an intended list of roughly 75. Mountain View suspended its Flock program in response [13]. SMPD's transparency portal lists 283 agencies [10]. Whether SMPD intended this scope is unknown — no records of access determinations were produced [16], so the department cannot demonstrate which agencies it deliberately chose to authorize.
- PRA W012174-021826 (filed February 18, 2026) requested four categories of records related to external agency access. The city's blanket response: "A good faith and diligent search yielded no records responsive to your request." Each item corresponded to a specific policy requirement: [16]
 - **Pre-approval process:** Policy 462.8(a) required external agencies to be subject to "a pre-approval process by SMPD and the database management administration." Policy 463.8(b) requires ALPR Committee Captain review before access is granted. O'Keefe stated the process "is completed within the Flock platform" and that she "was unable to locate documentation associated." [1, §462.8(a)] [3, §463.8(b)] [16]
 - **Written agreements:** Policy 462.8(b) required a written request including the agency name, person requesting, and intended purpose. Policy 462.8(c) required "the approved request is retained on file." No MOUs, data sharing agreements, or written agreements were produced. [1, §462.8(b)–(c)] [16]
 - **Access determination:** No records documenting how the department determined which of the 283 agencies to grant access, including configuration of Flock's statewide network, nationwide network, or direct sharing settings. [16] [10]
 - **Training verification:** Policy 463.9 requires the ALPR Administrator "shall ensure" that external users receive department-approved training. O'Keefe stated: "We do not retain records of training for external agencies." [3, §463.9] [16]
- The January 2026 audit memo states Lt. Casazza "verified that we are not sharing data with law enforcement agencies outside the state of California" [17]. The Flock Questions response confirms "none of its 31 cameras have statewide or national lookup capabilities enabled." This checks geography. It does not check entity type. University of the Pacific is in California — it passes the geographic check. But it is a private university that does not qualify as a public agency under § 1798.90.5(f) [12]. Three months of audits did not flag this [10].

- Three independent records document how sharing authorization works in practice. O’Keefe: the approval process “is completed within the Flock platform” [16]. Stockton PD’s records custodian described authorization as clicking “agree” when requested by another department: “All of the paperwork is created and kept by Flock. We do not retain or have any copies” [27]. A follow-up PRA to Stockton confirmed the administrator who authorized UOP’s access is “most likely no longer here” [38]. No agency in the chain described any independent legal review of whether sharing partners qualify as public agencies under § 1798.90.5(f).
- PRA W012174 requested “records documenting how the department determined which agencies to grant access” and received “no records responsive” [16]. However, a subsequent PRA (W012297) produced Flock-generated “Camera Access Request” emails in SMPD officer inboxes — including a February 2023 request from Robeson County NC SO (North Carolina) sent to Lt. Pak [28]. These emails do not document a determination process, but they define the mechanism by which agencies are added and show that access requests reached SMPD officers — records that bear on the earlier request but were not identified as responsive.
- The emails also indicate some decision-making is occurring. The Robeson County request (out-of-state) does not appear on SMPD’s current sharing list, while UOP (a private university) was on the access list until a resident raised the issue [10] [30]. This suggests officers are evaluating requests — but no documented process, criteria, or legal review governs those decisions [16].
- A PRA for records documenting the removal of agencies from the sharing list — including UOP — returned no responsive records. O’Keefe confirmed: “Removals from Flock are conducted within the platform at the discretion of the Lieutenant assigned to the ALPR Committee. There are no corresponding records” [31]. Agencies can be added or removed from a public surveillance sharing network at a single officer’s discretion, with no documentation and no approval process. A follow-up asking whether the Flock platform logs these changes was met with: “I did not locate a log of this information in the Flock platform” [31]. No audit trail exists at the agency or the vendor.
- PRA W012570 (closed April 22, 2026) produced the Flock platform event log that the W012328 response had stated did not exist [50] [31]. The log identifies the actors in two events for University of the Pacific: a 2/12/2026 “create networkShare” event by Phoenix O’Rourke (an SMPD member; permissions “feedView”), and a 2/28/2026 “delete networkShare” event by Lt. Steve Casazza (the documented Flock Committee administrator [17]; permissions “Search, VMS, Hotlist”). Per Policy 463.8(b), only the ALPR Committee Captain or a documented authorized designee may approve external-agency access changes [3]; PRA W012174 produced no records documenting any 463.8(b) designation framework [16]. No reading of the records is consistent with 463.8(b) compliance: if Casazza is the ALPR Committee Captain (the most plausible reading given his July 2025 Flock Committee assignment [17]), O’Rourke’s 2/12 action lacked the required authorization; if not, both actions did. The 2/12 addition placed UOP — an entity that does not qualify as a public agency under § 1798.90.5(f) [12] [29] — on the access list two months after Policy 463.8(b) took effect [3], indicating the broken approval process produced unauthorized, non-compliant additions even after the December 2025 policy revision.

7. Timing of Compliance Activity

- The Attorney General issued Bulletin 2023-DLE-06 on October 27, 2023 — two months after the Flock contract was executed — guiding all California law enforcement agencies to review vendor contracts for SB 34 compliance, conspicuously post ALPR policies, and address audit deficiencies. SMPD's first documented compliance activity occurred over two years later. [18]
- This pattern of retroactive compliance predates the December 2025 compliance window. A department-level Flock contract was signed in August 2020 with no corresponding approval action in council records [34]. By January 2022, 22 cameras were deployed — exceeding the contract's 12-camera scope [35]. The purchase order for the initial cameras was not issued until July 2023 [20, POAR PO-0000656]. Council records indicate the first Flock approval was August 2023 [8] — over three years after the 2020 service agreement [34].
- Lt. Steve Casazza was assigned as Flock Committee administrator in July 2025 [17] — five months before the first audit memo, two years into the Flock contract, and thirteen years after the department's first ALPR policy (Policy 462, 2012) [11].
- SOP 205 copyright date: November 10, 2025. Policy 463 copyright date: December 12, 2025. Policy 463 effective date: December 22, 2025. First documented audits: December 2025 [11]. Procedure 1102 (ALPR Systems) copyright date: March 6, 2026 [39]. The SOP 205 "update" changed only the copyright date — substantive content unchanged since February 2021 (see §1) [19]. The policy revision, first audits, and new operational procedure all occurred within approximately four months. [4, footer] [3, footer] [11] [39]
- Procedure 1102 (ALPR Systems), published March 6, 2026, is a new Lexipol operational procedure for Real Time Information Center (RTIC) personnel [39]. It defines duties for alert evaluation, call creation, license plate querying, and vehicle description searches. It directs RTIC personnel to use the ALPR system "when searching for vehicles associated to crimes or life or death emergencies" and to document matches as "possible plate matches only." The procedure is prescriptive — it describes what RTIC operators must do, not what ALPR searches are limited to. No prior operational procedure for ALPR use has been identified. The procedure is not linked from the department's License Plate Readers page [33] — it was found only through the city's site-wide search.
- The December 2025 policy revision made significant changes [3]: data sharing restricted to California-only agencies, immigration enforcement prohibition added, retention reduced from one year [1] to 30 days, new monthly/quarterly audit requirements with reporting to Chief.
- The December 2025 revision resolved a 27-month conflict between policy and contract. Policy 462.5 required a minimum one-year retention period [1]. The Flock contract specified 30 days [5, Exhibit A]. For the entire period between contract execution and the policy revision, one of them was being violated. The audit memos do not note this discrepancy [17].
- For regional context: the Attorney General sued El Cajon for out-of-state ALPR sharing in late 2025 [13]. Mountain View discovered in January 2026 that Flock had enabled unauthorized statewide access on 29 of 30 cameras for 17 months [13].

Source Documents

How to look up City Council records: Direct packet links are provided where available. Alternatively, visit <https://www.cityofsanmateo.org/publicmeetings> — use Advanced Search → Tracking Number field to search by File ID (e.g., 20-3547).

#	Document	Location / Links	QR
1	Policy 462 — SMPD Policy Manual (Aug 2020, Mar 2021)	Wayback Aug 2020 · Wayback Mar 2021	  Wayback Aug 2020 Wayback Mar 2021
2	Policy 463 (Jan 2023, pre-revision) — SMPD Policy Manual	Wayback Jan 2023	 Wayback Jan 2023
3	Policy 463 (Dec 2025, current) — Automated License Plate Readers	City website · Wayback Jan 2026	  City website Wayback Jan 2026
4	SOP 205 — ALPR Operating Procedure (three versions: Oct 2019, Feb 2021, Nov 2025)	Not publicly posted; obtained via PRA. Nov 2025 · Oct 2019 · Feb 2021 . Version history: Oct 2019 covered only PIPs + NCRIC (3 pages). Feb 2021 was a major rewrite: added Flock, Vigilant, BOSS; added California Values Act prohibition; created §205.5.1 platform audit subsection; created §205.7 ALPR Committees; added dual quarterly audit requirement. Nov 2025 is word-for-word identical to Feb 2021 — only the copyright date and page numbers changed. Still references Policy 462 (renumbered to 463 in January 2023). [19] [21]	  Nov 2025 Oct 2019  Feb 2021
5	Flock Safety MSA — executed Aug 25, 2023, \$501,350	Council packet for File ID: 23-7622, starting p. 255. Packet	 Adv. Search → Tracking #: 23-7622
6	Amendment No. 1 — executed Mar 20, 2024, \$138,950	Council packet for File ID: 24-8392, p. 175. Packet	 Adv. Search → Tracking #: 24-8392

#	Document	Location / Links	QR
7	Council Study Session — Police Accountability, Sep 1, 2020	File ID: 20-3547 (36-page packet; staff report p. 3; ALPR audit claim p. 24). Packet	 Adv. Search → Tracking #: 20-3547
8	Council Agenda Report — Flock purchase, Aug 21, 2023	File ID: 23-7622 (653-page packet; staff report pp. 242–244; resolution p. 245; order form p. 251; MSA starts p. 255). Packet	 Adv. Search → Tracking #: 23-7622
9	Council Agenda Report — Flock amendment, Mar 18, 2024	File ID: 24-8392 (1,487-page packet; staff report pp. 5–8; Amendment No. 1 p. 175; Exhibit C / Condor disclosure p. 177). Packet	 Adv. Search → Tracking #: 24-8392
10	Flock Transparency Portal — San Mateo CA PD	transparency.flocksafety.com · Archived copy	  transparency.flocksafety.com Archived copy
11	Email correspondence — Resident, O'Keefe, Khojikian, Barberini, Newsom	Feb 5–13, 2026	—
12	CA Civil Code § 1798.90.5 et seq. (SB 34) — ALPR operator and end-user obligations	Operator: § 1798.90.51 · End-user: § 1798.90.53 · Definitions: § 1798.90.5 · Sharing restrictions: § 1798.90.55	  § 1798.90.51 § 1798.90.53  § 1798.90.5
13	Regional news and government sources	City of Mountain View official statement · MV Voice · KQED · CA AG re El Cajon	  City of Mountain View MV Voice  KQED

#	Document	Location / Links	QR
14	PRA W012159-021226 — Flock Committee records (closed Feb 2026)	Calendar entries produced (3 meetings, 2024–2025); "no responsive records" for meeting minutes, agendas, notes, or summaries. Calendar entries	 Calendar entries
15	PRA W012160-021226 — Audit records and SOP reviews (closed Feb 22, 2026)	Requested: quarterly end-user audits, quarterly operator audits, annual SOP 205 reviews, Support Services Captain identity. Response: "A good faith and diligent search yielded no records responsive" to items 1–3. Item 4 produced: Dave Norris (9/9/18–4/9/21), Dave Peruzzaro (5/16/21–1/5/25), Matt Lethin (1/5/25–6/13/25), Jennifer Maravillas (6/22/25–present). Inline questions about SOP 205 review date and posting location not addressed. PRA response	 PRA response
16	PRA W012174-021826 — External agency access/sharing (closed Feb 2026)	Response by item: (1) agency access approval process "completed within the Flock platform," unable to locate documentation; (2–3) no responsive records for MOUs or sharing configuration; (4) "We do not retain records of training for external agencies." 283 agencies have access, zero training documentation. PRA filing text cited 285 agencies; manual count of Feb 18 portal archive yields 283 (difference: "University of California, Berkeley" parsed as two entries in automated counts). PRA response	 PRA response
17	Email from Kelly O'Keefe with attachments — Audit memos and Flock Questions response (via email thread, PRA W012129-020926)	Three monthly audit memos (Lt. Casazza to Chief Barberini: Nov 2025, Dec 2025, Jan 2026) and a Flock Questions response document describing audit process. Audit memos · Flock Questions	 Audit memos  Flock Questions
18	CA Attorney General Bulletin 2023-DLE-06 — ALPR/SB 34 compliance guidance	oag.ca.gov (PDF). Notes agencies should review vendor agreements for SB 34 compliance; clarifies sharing restrictions (no out-of-state, no federal, no private entities); conspicuous posting requirement.	 PDF
19	PRA W012198-022326 — SOP 205 version history and posting status (closed Mar 2026)	Produced: two prior SOP 205 versions (Oct 25, 2019 and Feb 10, 2021). PRA response · SOP 205 Oct 2019 · SOP 205 Feb 2021	 PRA response  SOP 205 Oct 2019  SOP 205 Feb 2021

#	Document	Location / Links	QR
20	PRA W012201-022326 — Camera inventory, decommissions, and invoices (closed Feb 26, 2026)	Produced: Flock Camera Manager screenshots (80 devices/80 live locations), O'Keefe spreadsheet (60 active devices), all Flock invoices since Jan 2023 (PRA scope began Jan 2023), and purchase orders. Earliest invoice in scope: INV-10888 (\$30,000, dated February 27, 2023, billing period from November 12, 2022) — six months before the MSA was executed; purchase order issued retroactively five months later. Response also revealed three conflicting device counts, 12 Picard devices and 1 Avicore device absent from all contracts, and \$12,872 in invoices with no purchase order. Camera Manager · Device spreadsheet · Invoices and POs	  Camera Manager Device spreadsheet  Invoices and POs
21	Email — O'Keefe camera count clarification (Feb 23, 2026)	Of 68 Flock devices, 54 have LPR capability and 14 do not. Two decommissioned (to be removed from transparency portal by Flock), leaving 66 active. "All cameras are part of the audit." "We do not own any cameras supported by Vigilant, BOSS, PIPS, NCRIC therefore we have no data to share." Screenshot	 Screenshot
22	Email — O'Keefe camera expansion clarification (Feb 23, 2026)	"There was no contract for the additional cameras, they were perched upon existing units and the cost was below the threshold requiring a new contract." Confirms 13 devices beyond the 55 covered by MSA and Amendment No. 1 were deployed without contract amendment or council action. Screenshot	 Screenshot
23	Email — O'Keefe Verkada confirmation (Feb 25, 2026)	Confirmed trailers were purchased and do not have ALPR. Confirmed "The City has a contract with Verkada for cameras at city sites, those also do not have ALPR." Screenshot	 Screenshot
24	2016-2017 San Mateo County Civil Grand Jury — "A Delicate Balance: Privacy vs. Protection" (filed July 12, 2017)	Finding F2: "The County and cities in San Mateo County have not enacted any ordinances governing their acquisition and use of surveillance technology, or the accessibility, management, or retention of the information acquired." Recommendation R3: agencies bring surveillance technology policy/ordinance before governing body by Dec 31, 2017. San Mateo did not adopt an ordinance in response. sanmateo.courts.ca.gov · PDF	  sanmateo.courts.ca.gov PDF
25	San Mateo Daily Journal — "Surveillance in parks expands in San Mateo" (July 22, 2025)	Council Member Nicole Fernandez: "We don't have a CCOPS ordinance." Article notes San Francisco, Palo Alto, and Davis have passed CCOPS ordinances; San Mateo has not. Also references Verkada park cameras (\$91K contract, six parks) and "Connect San Mateo" private camera network. smdailyjournal.com	 smdailyjournal.com

#	Document	Location / Links	QR
26	Email — Personal ALPR data request and denial (Feb 19 – Mar 5, 2026)	Resident requested own vehicle's ALPR detections and access logs per § 1798.90.55(a). Initial denial (Feb 26) cited § 1798.90.55(b) and public interest exemption (Gov. Code 7922.000; ACLU v. Superior Court). Follow-up (Feb 27) challenged scope, requested Condor video footage and access logs separately. O'Keefe response (Mar 5): "There is no existing process for verifying what ALPR data the Department holds on specific vehicles." Condor cameras "do not have LPR data and therefore do not have query information — I can not search which vehicles were captured on those cameras." Confirmed access logs maintained through Flock. Final follow-up (Mar 5) requested vehicle fingerprint searches, non-ALPR detections, aggregate counts, and access logs; cited Picard edge computing devices. Pending response. Email thread	 Email thread
27	PRA 10310081 — Stockton PD re: UOP ALPR sharing (closed Mar 4, 2026)	University of the Pacific appears on SMPD's Flock sharing list (§6); UOP is located in Stockton. This PRA asked whether Stockton PD — UOP's local law enforcement agency — independently determined UOP qualifies as a "public agency" under § 1798.90.5(f). Response (Maryann Weiman): MOUs are "created and kept on file by Flock." Authorization process: select "agree" when requested. "All of the paperwork is created and kept by Flock. We do not retain or have any copies." No public agency determination, no legal review, no retained documentation. PRA response	 PRA response
28	PRA W012297-030826 — Section 5.3 vendor disclosure records (filed Mar 8, 2026; closed May 6, 2026)	Requested: Flock notifications to SMPD re: §5.3 disclosures, SMPD tracking records, communications re: scope/exercise of §5.3, legal review of §5.3 vs. SB 34, disclosure logs, monitoring procedures. City Attorney claimed attorney-client privilege on Item 4 (legal review of §5.3 vs. § 1798.90.55(b)), confirming a legal analysis exists but declining to produce it. Rolling production included Flock-generated emails: "Camera Access Request from Robeson County NC SO" (Feb 2023, sent to Lt. Pak), community camera sharing notifications from Cal-Fire Wing, 10 Home Depot locations, and Ulta. These document the Flock platform's access request process but are not § 5.3 vendor-initiated disclosures. On 4/22/2026, a follow-up comment to the portal distinguished portal-mediated camera sharing (SMPD controls whether to accept) from § 5.3 disclosures (Flock acts unilaterally on its own good-faith belief, no SMPD approval required), and asked for a direct response to Item 6: any policy, procedure, or system documentation describing how SMPD monitors or tracks vendor-initiated disclosures. The 5/6/2026 response closed this PRA, stating it is "encompassed by an ongoing review of records under W012462-040226" and directing all future production there. Item 6 was not answered. PRA response	 PRA response

#	Document	Location / Links	QR
29	Email — Chief Grant Bedford, UOP Department of Public Safety (Mar 11, 2026)	Response to CPRA requesting legal authority for UOP's status as a "public agency." Bedford: "While University of the Pacific is a private institution and therefore not subject to the CPRA, we are happy to share Pacific's policy regarding the ALPR system." Linked to UOP ALPR policy page. Confirms UOP is private and not subject to CPRA. Email	 Email
30	Flock Transparency Portal archives — SMPD and Stockton PD (Mar 11, 2026)	SMPD portal: UOP no longer listed. Archive . Stockton portal: UOP still listed. Archive . Compare to Feb 18 archive [10] where UOP was present on SMPD's list.	 Archive  Archive
31	PRA W012328-031226 — UOP removal communications and sharing list changes (filed Mar 12, 2026; closed Mar 13, 2026)	"No records responsive." O'Keefe: "Removals from Flock are conducted within the platform at the discretion of the Lieutenant assigned to the ALPR Committee. There are no corresponding records." No internal communications regarding UOP were produced. Confirms sharing list changes require no documentation, no approval process, and are made at a single officer's discretion through the Flock platform. Follow-up asked whether the Flock platform maintains a log of additions/removals. O'Keefe: "I did not locate a log of this information in the Flock platform." No audit trail exists at the agency or the vendor. PRA response	 PRA response
32	PRA W012320-031126 — Search activity compliance and audit records (rolling production; next update 5/20/2026)	Requested quarterly search activity audit records under SOP 205 (end-user and operator), aggregate compliance counts (case number entry, justification verification), and external agency search counts. The request expressly stated that re-producing the Casazza sharing-configuration memos would not be responsive. Responses on 3/17, 4/8, 4/22, and 5/6 have each produced no records, repeating "At this time there are no responsive records to your request." The 3/17 and 4/8 responses pointed back to the Casazza memos as "all audit records maintained by the Department" and invoked § 7923.600 and § 1798.90.55(b) to decline the aggregate counts. The 5/6 response added that "there may be responsive emails associated with this request" due to the W012462-040226 volume, routing any email-related production into that queue [48] . Confirms no search activity compliance audit has ever been conducted; sharing-configuration memos are the only audit records that exist. PRA response	 PRA response
33	Wayback Machine snapshots — SMPD License Plate Readers page (Mar 16 and Apr 3, 2026)	Archived snapshots of cityofsanmateo.org/3211/License-Plate-Readers . Page links to full policy manual (not standalone Policy 463). SOP 205 not posted. No mention of Flock by name. Unchanged between snapshots. Wayback Mar 16 · Wayback Apr 3	 Wayback Mar 16  Wayback Apr 3

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34	PRA W012373-032026 — Pre-MSA Flock contract (rolling production; May 6 update)	Item 1 requested any contract, agreement, MOU, or written authorization between SMPD and Flock in effect between November 2022 (first Flock invoice) and August 25, 2023 (MSA execution). Produced: Flock Group Inc. Services Agreement Order Form — "San Mateo PD - Phase 1." 12 cameras, \$24,000/year, 24-month initial term with 12-month renewal. Signed by Garrett Langley (Flock CEO, 07/29/2020) and Lt. Todd Mefford (SMPD, 08/17/2020). Document Ref: N4JAT-XUHHU-6AJ2L-VWSQC. This agreement predates the August 2023 MSA by three years and does not appear in any Council agenda as an approval item. Item 1 confirmed: the 2020 Service Agreement is the only record responsive — no bridge contract, amendment, or extension was produced for the gap period. Item 2 (written authorization for deployment/operation): three consecutive updates (4/8, 4/22, 5/6) have produced no records, each repeating "At this time there are no responsive records to your request." The city has not closed Item 2; rolling email search continues; next update no later than 5/20/2026. Service Agreement · PRA response	  Service Agreement PRA response
35	Council Special Meeting — Goal Setting, Jan 29, 2022	Meeting ID 1065, p. 7. Status column for Objective 21A reports: "22 Flock ALPRs deployed at strategic locations throughout the City resulting in 123 cases where police action was initiated based on data." Confirms 22 cameras operational by January 2022 — 10 more than the 2020 contract's 12-camera scope, and 19 months before Council approved the MSA. Packet	 Packet
36	PRA W012376-032026 — NCRIC data sharing agreements (filed Mar 20, 2026; rolling production)	Item 1 produced: NCRIC Memorandum of Understanding (August 2014), a blanket data sharing agreement covering ALPR, records management, CAD, and intelligence systems. Section 9 grants NCRIC authority to "execute information sharing agreements with new Member Agencies" without "further review or approval by member agencies." Item 2 (NCRIC public agency analysis under § 1798.90.5(f)): rolling production. Item 3 (records of SMPD restricting NCRIC re-sharing): "no responsive records." NCRIC MOU · PRA response	  NCRIC MOU PRA response
37	Flock Transparency Portal — NCRIC (archived Mar 27, 2026)	318 organizations on NCRIC's sharing list. Includes University of the Pacific and University of San Francisco (private institutions), as well as El Cajon PD (currently sued by AG for SB 34 violations). NCRIC's stated sharing policy: "may only share, disseminate, or provide access to ALPR information to other California state or local law enforcement agencies." Archived PDF	 Archived PDF
38	PRA 10325372 — Stockton PD re: UOP public agency determination, follow-up (closed Mar 31, 2026)	Follow-up to #10310081 [27]. Requested records of a determination that UOP qualifies as a "public agency" under Gov. Code § 6252(a) / Civil Code § 1798.90.5(f) prior to authorization as an ALPR sharing partner. Weiman: "there is no written documentation regarding any agreement with Stockton PD and UOP PD. Authorization is made through the portal by an SPD Flock administrator, and most likely the flock administrator who gave the authorization is no longer here." PRA response	 PRA response

#	Document	Location / Links	QR
40	Council Regular Meeting — Flock informational presentation, Jun 1, 2020	Meeting ID 474. Staff report introduces Flock ALPR technology as informational item; no approval action. Council Members present: Goethals, Rodriguez, Bonilla, Lee, Papan. Minutes from June 15 meeting (Meeting ID 475) note Council "provided comments in support of the programs and asked that it be brought back to report to Council after a year." Jun 1 packet · Jun 15 packet (minutes)	  Jun 1 packet minutes
39	SMPD Procedure 1102 — ALPR Systems (Lexipol, published Mar 6, 2026)	Prescriptive operational procedure for Real Time Information Center (RTIC) personnel on monitoring and using the ALPR system. Covers alert evaluation, call creation, license plate querying, and vehicle description searches. Directs RTIC personnel to use ALPR "when searching for vehicles associated to crimes or life or death emergencies" and to document matches as "possible plate matches only." Defines operator duties, not search restrictions. Published by Lexipol with SMPD permission. Not linked from the License Plate Readers page [33]; found via site search. City of San Mateo search	 City of San Mateo sear
41	NCRIC — About, governance, and policy documents	NCRIC describes itself as "a multi-jurisdictional public safety information fusion center" created under the Northern California HIDTA program. Housed at 450 Golden Gate Ave, San Francisco (Phillip Burton Federal Building, GSA-managed). Operates on ca.gov domain under 28 CFR Part 23. Funded through ONDCP, DHS via Cal OES, and Bay Area UASI. No public budget disclosed. GAO-15-155 found DHS could not accurately account for federal funding to fusion centers. About · Privacy/policy docs · GAO-15-155	  About Privacy/policy docs  GAO-15-155
42	NCRIC NC HIDTA Executive Board — membership	18 voting members: 9 federal (ATF, DEA, FBI, IRS Criminal Investigation, U.S. Marshals, DHS, Postal Inspection, U.S. Forest Service, U.S. Attorney NDCA) and 9 state/local (Alameda Co. SO, CA DOJ, Contra Costa Co. SO, Daly City PD, Marin Co. SO, SFPD, San Jose PD, San Mateo County DA, San Mateo County SO). ncric.ca.gov	 ncric.ca.gov
43	EFF — "San Francisco Police Must End Irresponsible Relationship with Northern California Regional Intelligence Center" (Sep 2022)	Documented SFPD chief as chair of NCRIC executive board; SFPD had not signed a data-sharing MOU with NCRIC. eff.org	 eff.org
44	California State Auditor — Report 2026-134, "California Fusion Centers — State and Local Oversight" (approved Mar 2026)	Audit covers compliance with state law, data sharing practices (including with ICE), private sector involvement, funding sources, and performance metrics. Triggered by reporting on fusion centers sharing ALPR data with ICE. auditor.ca.gov	 auditor.ca.gov
45	Flock Transparency Portal — NCRIC (archived Apr 3, 2026)	24 cameras, 717,224 vehicles detected (30 days), 3,037 searches (30 days), 318 sharing partners. Archived JSON	 Archived JSON

#	Document	Location / Links	QR
46	PRA W012460-040226 — Council authorization for 2020 Flock deployment (closed Apr 7, 2026)	Requested: (1) any Council vote, resolution, or motion authorizing the use of or expenditure on Flock ALPRs in 2020; (2) if none, documentation of the authorization under which the 2020 service agreement was executed. Response produced: June 1, 2020 council agenda report (File ID: 20-3025, informational item) and meeting minutes. The agenda report's recommendation section reads "Review and provide feedback"; its budget impact section states "There is no budget impact as a result of this informational item." No vote, resolution, or motion was produced. PRA response · Agenda report · Minutes	 PRA response  Agenda report  Minutes
47	PRA W012461-040226 — Follow-up audit memos (closed Apr 7, 2026)	Requested: (1) monthly internal audit memos under Policy 463.10 from Feb 2026+, (2) quarterly external audit memos under Policy 463.10 from Dec 2025+, (3) quarterly operator/end-user audit records under SOP 205.5.1 from Dec 2025+, (4) NCRIC end-user audit records per SOP 205.5.1. Items 1–3 all marked "See attached" — produced four .doc audit memoranda (December 2025, January 2026, February 2026, March 2026). Newer memos use "internal and external" audit language, a change from the earlier Casazza memos [17] . Item 4 (NCRIC end-user audits): "No responsive records." PRA response · Audit memos	 PRA response  Audit memos

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48	PRA W012462-040226 — All Flock Safety emails to SMPD (filed Apr 2, 2026; withdrawn May 6, 2026)	Requested: all emails received by any SMPD email address from @flocksafety.com or @mail.flocksafety.com, January 2020 to present. City disclosed 211,872 documents requiring staff review at approximately 10 hours per week with no completion date provided. The 5/5/2026 formal response acknowledged the April 7 notification had erroneously indicated records were released before they were — the initial batch was not fully uploaded until 1:32 PM on April 21. Remaining withheld records asserted exempt under § 7923.600 (law enforcement investigative records); city cited Haynie v. Superior Court to decline producing a privilege log. "No responsive records" on hot-list alert verification. The 5/5 production batch (32 records over 33 days) consisted entirely of Flock vendor marketing emails and partner-agency camera-sharing notifications; included camera sharing notifications to Lt. Pak from Covina CA PD (May 2022) and Tracy CA PD (Dec 2022); SMCSO custom hot list shared via "City of Millbrae CA (SMCSO)" by Jason Reed (Dec 2022); a camera access request personally sent by Albany CA PD Det. Sgt. Justin Kurland to Pak (Dec 2022), predating the February 2023 system-generated Albany request produced under W012297 [28]; a November 2022 email exchange in which Pak consulted Flock CSM Graham Carter on how to respond to a third-party PRA seeking aggregate detection and hit statistics; and a Flock-organized NorCal RTCC Roundtable invitation (Aug 2022) sent to Pak alongside chiefs from Elk Grove, Morgan Hill, Salinas, and San Ramon. The city's disclosed scope of 211,872 documents — roughly 35,000 emails per year over the 6-year request window — was not anticipated when the request was filed; at the city's stated review pace, the production timeline was not productive. Withdrawn at 10:12 PM on 5/6 to let the Department focus on the substantive PRAs (audit records, deployment authorization, vendor disclosure procedures); the right to re-file on a narrowed scope was reserved. (For context: on 5/6 the city had closed W012297 [28] into this corpus, declared W012596/W012597 "encompassed by" it, and extended W012373 [34] and W012459 [49] under the same email-search framing.) PRA response	 PRA response

#	Document	Location / Links	QR
49	PRA W012459-040226 — Council "year of experience" report-back (filed Apr 2, 2026; Item 1 closed Apr 9, 2026; Item 2 rolling, next update 5/20/2026)	Requested: (1) any report, presentation, memorandum, or agenda item prepared in response to Council's June 15, 2020 request to "report to Council after a year of experience with these programs"; (2) email correspondence or calendar entries discussing or scheduling the requested follow-up report. Response produced: 11 numbered strategic-plan / goal-setting packet excerpts (Sep 2020 – Feb 2024), the August 21, 2023 MSA packet (staff report, resolution, minutes), and three Council Weekly Updates (June 2025, March 2026, April 2026). No standalone report, memorandum, or dedicated Flock agenda item between June 2020 and August 2023 was produced. Notable disclosures: Mar 15, 2021 Strategic Plan Draft Review listed "\$50,000" annual cost for Flock fixed ALPR "already...incorporated into FY 2021-22 Budget"; Sep 21, 2020 update referenced "ALPRs on 4 vehicles and two mobile message trailers" (vehicle-mounted era); June 20, 2025 Council Weekly Update disclosed Axon Fusus integration and the rebrand of NEST to "San Mateo Connect." On 5/6/2026 the city produced ORT (Organized Retail Theft) grant procurement records — Amendment No. 1 order form, the March 18, 2024 Council Agenda Report and Resolution No. 21 (2024), Purchase Order PO-0001042 (\$48,950), and internal procurement emails (Lethin/Sianez/Toomey, March 2024). The Council AR for the ORT grant disclosed C3AI as a fourth surveillance / data-integration platform: described as "a data integration and investigative technology system" funded by the same BSCC grant, purchased by Daly City "on behalf of both San Mateo Police Department and San Bruno Police Department," and "in the process of implementation throughout San Mateo County." The 5/6 message confirmed no responsive emails had been located since the April 15 production. Item 2 next update 5/20/2026. PRA response · Mar 2021 Draft Review · All attachments	  
50	PRA W012570-041926 — Flock platform event log (closed Apr 22, 2026)	Requested: Flock platform event log entries for SMPD's account, covering events touching the network share with University of the Pacific. Produced: SMPD Flock platform event log (4/20/2026 export), showing a 2/12/2026 04:51:19Z `create networkShare` event with permissions `feedView` (User: Phoenix O'Rourke; Receiving Organization: University of the Pacific (CA)) and a 2/28/2026 04:09:40Z `delete networkShare` event with permissions `Search, VMS, Hotlist` (User: Steve Casazza; Receiving Organization: University of the Pacific (CA)). On the face of the produced log, the 2/12 create has no corresponding delete event and the 2/28 delete has no corresponding create event — the log is internally inconsistent. The production also directly contradicts O'Keefe's W012328 statement that no platform log of additions/removals existed [31]. Event log · PRA response	 

#	Document	Location / Links	QR
51	PRA W012683-050626 — MSA § 5.3 monitoring mechanism, Item 6 follow-up (filed May 6, 2026; pending)	Follow-up to W012297 [28], which was closed 5/6/2026 with Item 6 unanswered. Requested: any record of any kind — policy, procedure, contract addendum, system configuration, or standing arrangement — describing how SMPD would become aware of a disclosure by Flock under MSA § 5.3 (vendor-initiated access or disclosure based on Flock's own good-faith belief, without SMPD approval). Noted that § 5.3 disclosures would not necessarily generate an email in SMPD's inbox, distinguishing this from the W012462 email corpus. If no responsive records exist, a statement to that effect was requested. Pending response. PRA response	 PRA response
52	PRA W012693-050726 — Records of W012462 deferral handling (filed May 7, 2026; pending)	Filed after W012462 [48] was withdrawn. Requests internal Department records reflecting how SMPD handled the requestor's May 6 correspondence asking for W012462 to be deprioritized, and records reflecting the use of W012462 as a basis for closing W012297 [28] and extending W012373 [34] and W012459 [49] — the latter two extensions both made after the deprioritization message and on the same afternoon. Items 1 and 3 seek portal/tracking records of two specific correspondence events; Items 2 and 4 seek internal records reflecting the deferral decisions themselves. Pre-emptively addresses likely exemption arguments: § 7923.600 (records are administrative, not investigative); deliberative process (records are operational PRA-handling, not pre-decisional policy deliberations); § 7927.700 (staff names in PRA-handling decisions are not personnel records). Search scope expressly excludes records produced under W012462, distinguishing this request from the withdrawn email corpus. Pending response. PRA response	 PRA response

#	Document	Location / Links	QR
53	PRA W012686-050726 — § 5.3 vendor disclosure records, refile of W012297 (filed May 7, 2026; pending)	Refile of W012297 [28], which the city closed 5/6/2026 by folding it into W012462 [48] without responding to the substance of the request. Restates all five items of W012297 with scope clarifications: Items 2 and 4 seek internal SMPD records (memoranda, tracking records, legal analyses) that "are not email records and cannot be satisfied through review of any @flocksafety.com email corpus"; Item 5 includes outbound SMPD-to-Flock communications, which would not appear in any corpus limited to inbound vendor emails. Expressly excludes camera-sharing notifications, SMPD's deliberate sharing decisions, and transparency-portal data as not responsive. Pre-emptively addresses likely exemption arguments: § 1798.90.55(b) restricts SMPD's outward sharing of ALPR data, not records of the vendor's own disclosures; § 7923.600 covers files compiled for a particular investigation, not vendor contract administration. Cites City of San Jose v. Superior Court (2017) 2 Cal.5th 608 — records held by Flock as SMPD's contractor are agency records regardless of physical location, as confirmed by SMPD's own production of vendor-held event log data under W012570 [50]. Asks for treatment "with corresponding urgency given the time already elapsed" since the original March 8 filing. Pending response. PRA response	 PRA response
54	Email — Resident letter to Chief and Council re: ALPR audit and disclosure alignment (May 5, 2026)	Letter to Chief Barberini and City Council asking for consistent application of existing SMPD policy and state law across audits (Policy 463.10, SOP 205.5.1), external-agency approval (Policy 463.8(b)), sharing scope, and SOP 205 posting. Email	 Email
55	Email — Resident follow-up to Chief and Council re: W012462 production pace (May 5, 2026)	Same-day follow-up flagging the production pace on the Flock email corpus (W012462-040226) and asking the Department to deprioritize it in favor of the substantive oversight PRAs. Email	 Email
56	Email — Chief Barberini re: June 4 meeting logistics (Jun 2, 2026)	Confirmed the June 4, 2026 meeting and stated that specific PRA requests would not be discussed at the meeting; W012818-053026 to be produced through the portal. Email	 Email
57	Email — Resident transmittal of findings document after June 4 meeting (Jun 4, 2026)	Post-meeting email transmitting this findings document to the Chief and staff for review. Email	 Email
58	Email — Resident summary of June 4 meeting (Jun 22, 2026)	Requester's written summary of the June 4 meeting, circulated for correction by July 6, 2026; topics included recent sharing changes, how the City learns of other agencies' problems, federal and out-of-state sharing, the UOP authorization, and the scope of sharing. Email	 Email

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59	Email — Chief Barberini response to meeting summary (Jul 4, 2026)	Department response providing clarifications on UOP police status, the City's sources of information about other agencies, San Francisco sharing, and the Costa Mesa matter. Email	 Email
60	Email — Resident corrections to the record (Jul 12, 2026)	Reply to the July 4 response addressing sharing scope relative to the 2020 and 2023 Council presentations, hot lists, the public-agency determination under § 1798.90.5(f), universities remaining on the list, and federal-adjacent searches. Email	 Email
61	2025-2026 San Mateo County Civil Grand Jury — "Is Our Flock of ALPR Cameras Properly Tended?" (released Aug 3, 2026)	Countywide review of every SMC ALPR operator (582+ cameras, 18 operators). San Mateo City Council assigned findings F4 (no records demonstrating policy-required audits), F5 (audit reports insufficient to substantiate compliance with law and policy), F6 (no California-compliance contract terms), F7 (policy's written-request/executed-agreement sharing process not substantiated by records), and F8 (no criteria for approving or terminating in-state sharing); responses due within 90 days under Penal Code § 933(c). Summary matrix rates San Mateo's audit practices "Weak; not published." Countywide finding F3 addresses sharing with private university security entities (Stanford, University of the Pacific); the report's sharing table shows San Mateo at 283 network shares (2/26/2026), 280 (4/13/2026), and 0 private-university shares — after UOP's February 28 removal [50]. sanmateo.courts.ca.gov · Archived copy	 sanmateo.courts.ca.gov  Archived copy

Key Contacts

- **Kelly O'Keefe** — Police Technical Services Administrator, Oversees Records Division. Primary PRA contact. [\[11\]](#) [\[17\]](#)
- **Ed Barberini** — Chief of Police. Signed both Flock contracts. [\[5\]](#) [\[6\]](#)
- **Alex Khojikian** — City Manager. [\[11\]](#)
- **Rob Newsom** — Council Member. Forwarded resident concerns to City Manager. [\[11\]](#)
- **Lt. Todd Mefford** — Signed the 2020 Flock Service Agreement on behalf of SMPD. [\[34\]](#)
- **Lt. Matthew Earnshaw** — Staff contact on August 2023 agenda report. [\[8\]](#)
- **Lt. Paul Pak** — Point of contact on Amendment No. 1. [\[6\]](#) Calendar entries produced from his account. [\[14\]](#)
- **Lt. Steve Casazza** — Flock Committee administrator (assigned July 2025). Author of audit memos. [\[17\]](#)
- **Capt. Matt Lethin** — Support Services Captain (1/5/25–6/13/25). [\[15\]](#) Staff contact on March 2024 amendment. [\[9\]](#) Email "no longer valid." [\[14\]](#)
- **Bahar Abdollahi** — Assistant City Attorney. "Approved as to Form" on Amendment No. 1 (not on original MSA). [\[6\]](#)
- **Mark Smith** — Flock Safety General Counsel. Signed original MSA. [\[5\]](#)
- **Andrew Trujillo** — Organized ALPR Committee and LPR meetings (2024–2025). [\[14\]](#)
- **Samantha Leung** — ALPR Committee Meeting attendee. [\[14\]](#)
- **Mikhail Venikov** — ALPR Committee Meeting attendee. [\[14\]](#)
- **Jillian Goshin** — ALPR Committee Meeting attendee. Email no longer valid. [\[14\]](#)
- **Dave Norris** — Support Services Captain (9/9/18–4/9/21). [\[15\]](#)
- **Dave Peruzzaro** — Support Services Captain (5/16/21–1/5/25). [\[15\]](#)
- **Jennifer Maravillas** — Support Services Captain (6/22/25–present). [\[15\]](#) Signed PRA W012460 response. [\[46\]](#)

Appendix A: Flock Transparency Portal — Agency Access Breakdown

Source: Flock Safety Transparency Portal for San Mateo CA PD, archived February 18, 2026 [10]. Manual count: 283 organizations.

Summary

Category	Count	Notes
Total organizations listed	283	
San Mateo County agencies	14	The "allied County law enforcement agencies" referenced in the 2023 staff report [8]
Agencies outside San Mateo County	269	
Deactivated	1	Santa Cruz CA PD

Entity types on the access list

The 2023 staff report described sharing with "NCRIC and allied County law enforcement agencies." [8] The access list includes the following categories of organizations beyond county law enforcement:

District Attorney offices (10): Kings County CA DAs Office, Marin County CA DA, Monterey County District Attorney's Office, Placer County CA DA Office, Riverside County CA District Attorney, Sacramento CA DA, San Francisco District Attorney CA, San Joaquin CA DA, Santa Clara DA CA, Solano County DA CA

Campus and education police departments (11): San Jose State University CA, Cal State Fullerton (CA), Cal State San Bernadino [sic] CA PD, Cerritos College CA PD, Rio Hondo College PD CA, San Joaquin Delta College PD (CA), Sequoias Community College District CA PD, UC Irvine Campus PD CA, University of California Berkeley, University of the Pacific (CA), West Valley Mission College Dist Campus (CA). **Note:** University of the Pacific is a private institution that does not qualify as a "public agency" under § 1798.90.5(f). Its inclusion on the access list is inconsistent with § 1798.90.55(b). UOP's Chief of Police confirmed in writing that it is "a private institution" [29]. UOP was subsequently removed from SMPD's portal but remains on Stockton PD's [30]. [12] All other campus entities listed are part of the UC, CSU, or California community college systems (state agencies).

State agencies (4): Cal Fire, California Highway Patrol, California State Parks, NCRIC

Other non-PD/SO entities (3): Orange County Fire Authority (CA), Sacramento County Parks Department CA, Los Angeles Port Police CA

Geographic range

Southernmost agencies (10): Brawley CA PD, Calexico CA PD, Chula Vista CA PD, El Cajon CA PD, El Centro CA PD, Imperial City CA PD, Imperial County CA SO, National City CA PD, Oceanside CA PD, San Diego Harbor CA PD

Northernmost agencies include: Yuba County Sheriffs Office, Yuba City CA PD, Sutter County CA SO, Shasta County SO, Tehama County CA SO, Lassen County SO (CA), Modoc County CA SO

San Mateo County agencies (14)

Belmont CA PD, Brisbane CA PD, Burlingame CA PD, Colma CA PD, Daly City CA PD, Foster City CA PD, Hillsborough CA PD, Menlo Park CA PD, Pacifica CA PD, Redwood City CA PD, San Bruno CA PD, San Mateo County CA SO, South San Francisco CA PD, Town of Woodside CA (SMCSO)

Appendix B: Statutory Compliance Matrix

Element-by-element comparison of California Civil Code §§ 1798.90.51 (operator), 1798.90.53 (end-user), and 1798.90.55 (sharing) against Policy 463 [3], SOP 205 [4], and documented practice. Analysis date: April 2, 2026. Statute text: [12].

SMPD is both an ALPR **operator** (§ 1798.90.51 — it operates Flock cameras) and an ALPR **end-user** (§ 1798.90.53 — it accesses ALPR data, including from community cameras). Both sections impose nearly identical obligations.

#	Statutory Element	Statute	Policy 463 / SOP 205	Practice	Status
1	Security procedures	Maintain reasonable security procedures — operational, administrative, technical, physical [§.51(a)]	463.6: login/password, access logs. SOP: VPN, MFA for Flock [3] [4]	Flock platform controls; no logging of sharing list additions or removals [31]; no user offboarding process; no incident response procedure described	✗ Non-compliant
2	Policy posting	Usage/privacy policy posted conspicuously on agency website [§.51(b)(1)]	463: in policy manual since ~2020; standalone link Dec 2025. SOP 205.1 requires conspicuous posting [3] [4]	SOP 205 never posted. Policy in 400+ page manual until Dec 2025 [11] [15]	✗ Non-compliant
3	Authorized purposes	Describe authorized purposes for ALPR use [§.51(b)(2)(A)]	463.2: stolen vehicles, warrants, suspect interdiction. 463.4(b): "any routine patrol operation or criminal investigation" [3]	463.2 purposes are narrow; 463.4(b) applies to "Department members" only. No authorized purposes defined for 283 external agencies [10]	▲ Partial
4	Job titles	Job title or designation of authorized employees [§.51(b)(2)(B)]	463: "members" / "authorized designee." SOP: no titles [3] [4]	Titles listed only in internal PRA response: Officers, Crime Analysts, Dispatchers, CSOs [17]	✗ Non-compliant
5	Monitoring & compliance	How system will be monitored for security and compliance [§.51(b)(2)(C)]	463.6(c): audits "as described in SOP 205." 463.10: monthly/quarterly [3]	No end-user audits conducted. Monthly memos review sharing config only. SOP 205 end-user audit criteria (case numbers, search justifications) apply to NCRIC, not Flock [17] [11] [21]	✗ Non-compliant

#	Statutory Element	Statute	Policy 463 / SOP 205	Practice	Status
6	Sharing process	Purposes, process, and restrictions on sharing [§.51(b)(2)(D)]	463.8: CA public agencies only, ALPR Committee Captain review [3]	283 agencies via Flock network, not through manual approval. § 5.3 vendor disclosure not addressed [10] [5]	▲ Partial
7	Custodian title	Title of official custodian responsible for implementation [§.51(b)(2)(E)]	463: "ALPR Committee Captain." SOP: "Support Services Captain" [3] [4]	Two conflicting titles across two documents	▲ Partial
8	Accuracy	Measures to ensure accuracy and correct errors [§.51(b)(2)(F)]	463.4(f): visual plate confirmation. 463.10: audit memos note errors [3]	No public correction process. No mechanism for external agencies to report errors [10]	▲ Partial
9	Retention	Retention period and destruction process [§.51(b)(2)(G)]	463.5: 30 days. SOP: 30-day auto-delete for Flock video [3] [4]	Retention stated and implemented. Prior 27-month policy/contract conflict now resolved [5] [1]	✓ Addressed
10	End-user audit process	Periodic system audits for end-user data access [§.53(b)(2)(C)]	Not separately addressed for end-user data [3] [4]	Community camera data accessed via Flock; audit memos review only "our" cameras [17] [20]	✗ Non-compliant
11	Sharing restrictions	Share only with public agencies [§.55(b)]	463.8: CA public agencies only [3]	University of the Pacific (private, does not qualify under §.5(f)) on access list. No public agency determination by SMPD or Stockton PD; UOP Chief confirmed private institution [29]. Subsequently removed from SMPD portal; remains on Stockton [30]. § 5.3 authorizes Flock disclosure to third parties [10] [5]	✗ Non-compliant

Summary: 1 addressed, 4 partial, 6 non-compliant.