



MEMORANDUM

Date: July 17, 2026

To: Mayor and City Council

From: Joe Calabrigo, Interim City Manager 
Tracy Avelar, Police Chief

Subject: Access to ALPR Data

Summary

At the July 7, 2026 City Council meeting, a speaker raised concerns regarding the Pleasanton Police Department illegally sharing license plate data with federal border patrol agencies. The speaker further questioned whether or not Automated License Plate Reader (ALPR) system audits were being conducted, and why any improper data sharing would not have been identified during the course of such audits.

Acknowledging the concerns raised by the speaker, City staff followed up to determine whether or not restricted ALPR data could have been shared, and if so, circumstances that could have led to any unauthorized agency potentially having access to such data.

The subsequent review has identified two errors that occurred which could have resulted in limited ALPR data being shared with a federal agency, the San Diego Sector Border Patrol (SDSBP).

First, the SDSBP, a federal agency, was incorrectly listed as a state agency on the Agency Data Sharing Report for the City's former Vigilant ALPR system. When all out-of-state agencies were removed from that report in 2023 following clarifying guidance from the State Department of Justice, the misclassification caused the SDSBP entry to be retained.

Second, although the City terminated its Vigilant contract with Motorola Solutions in October 2025, Motorola's records continued to show the contract as active, and Vigilant cameras at three Caltrans-controlled locations remained in operation and continued to collect data. Those cameras were deactivated on July 8, 2026.

The Vigilant system was not configured to log searches conducted by outside agencies. As a result, no record exists that would allow the City to determine whether the SDSBP actually accessed Pleasanton ALPR data at any point.

This memorandum describes what occurred, what has been corrected, and the steps the Police Department is taking to prevent recurrence.

Background

Pleasanton currently utilizes ALPR technology offered through a company called Flock Safety (Flock). Use of the Flock system began with a pilot program in 2021. California law (SB 34, Ca Civil Code section 1798.90.5 et seq.) prohibits public agencies from sharing ALPR data with agencies outside of California, including federal agencies. Consistent with that law, it is the policy of the Police Department not to share ALPR data with ICE or any federal agency, and the sharing settings in the Flock system are configured to limit access to eligible California agencies.

Prior to transitioning over to the Flock system, Pleasanton utilized a Vigilant ALPR system offered through Motorola Solutions. The Vigilant contract was cancelled by the City in October 2025 via a letter which was sent to Motorola directing them to terminate services.

The Flock system allows the Police Department to view license plate searches done by the City and other outside agencies. This feature was not available when the City implemented the earlier Vigilant system. The Flock system's sharing settings are configured to restrict access to agencies authorized under California law. Again, this was not the case with the older Vigilant system. Both the prior Vigilant system and the current Flock system retain data collected for thirty days. Following the July 7, 2026 City Council meeting, the Police Department contacted Motorola whereupon we learned that, despite the City having terminated the Vigilant contract, Motorola continued to show the contract being active until December 2026.

As part of the transition from Vigilant to the Flock ALPRs, Flock was required to replace all Vigilant cameras with Flock cameras. This has been largely completed. However, replacement of the Vigilant cameras was delayed in three locations (intersections), pending Caltrans approval (the locations are controlled by Caltrans). The three intersections are:

- Westbound Stoneridge Drive @ El Charro
- Westbound Stoneridge Drive @ Southbound I-680; and
- Southbound Hopyard Road @ I-580

While the City believed that the contract with Motorola had been terminated, cameras in these locations have continued to operate and collect data. As of July 8, 2026, the Police Department can confirm that the Vigilant ALPR cameras in these locations have now been deactivated.

A second issue regards how agencies share ALPR data. Both the prior Vigilant system and the current Flock system allow data to be shared with other agencies seeking information about a specific license plate (vehicle). Data sharing occurs with eligible agencies that are listed on Agency Data Sharing Reports that are maintained by the Police Department. The Police Department has the discretion of adding or subtracting agencies from the Data Sharing Reports. The Vigilant system had its own Data Sharing Report that was used only for the Vigilant system. The current Flock system also has its own Data Sharing Report that includes agencies that can access that data. Although the eligible agencies included on both lists were similar, the same list was not used for both systems.

The Police Department performs semiannual ALPR audits, documented in an internal department memorandum to the Chief of Police. These audits review system utilization, meaning the searches conducted by the Police Department and by outside agencies during the prior six-month period, to confirm that use is consistent with applicable state laws and policies.

The review conducted following the July 7 City Council meeting identified two limitations in that audit design. First, the audits review how the system was used. They do not separately verify the accuracy of the Agency Data Sharing Report that determines the agencies eligible to search. Although the SDSBP was incorrectly listed as a state agency on the Agency Data Sharing Report for the Vigilant ALPR system, this error was not identified through a review of system utilization. Rechecking the Agency Data Sharing Report used with the Flock system confirms that no unauthorized agencies are listed. In addition, the Flock system is newer and provides more detailed information regarding which agencies may have checked on a specific license plate. The Vigilant system was not configured to track search history from other agencies, so a utilization audit could not have identified a search conducted by SDSBP.

The Police Department has prioritized limiting the number of agencies that data is shared with. In 2023, after receiving clarifying guidance from the State Department of Justice, all out-of-state agencies were removed from the Data Sharing Report used with the Motorola Vigilant system. The SDSBP, a federal agency, was incorrectly listed as a state agency on that report and was therefore not removed. Because the City had discontinued use of the Vigilant system, and understood the Motorola contract to be terminated, the error was identified only upon further review following the July 7 City Council meeting. Motorola has advised that the Vigilant system retains no record that would establish whether the SDSBP actually conducted a search of Pleasanton ALPR data.

Conclusion

In following up on concerns raised at the July 7, 2026 City Council meeting, staff identified errors which could have resulted in Vigilant ALPR data being shared with the SDSBP. The SDSBP remained eligible to search data collected by the Vigilant system at the three locations identified above, until July 8, 2026. Because the Vigilant system did not log searches by outside agencies, no record exists that would allow the City to determine whether the SDSBP actually conducted any search of Pleasanton ALPR data.

The Police Department has now taken steps to ensure that there are no longer any Vigilant ALPRs in operation anywhere within the City. The Agency Data Sharing Report used with the Flock system has been rechecked to confirm that only agencies allowed under SB 34 are included, and the sharing settings in the Flock system are configured to ensure this.

Acknowledging that errors were made, the Pleasanton Police Department is committed to protecting the privacy of our community, complying with all applicable laws, and maintaining the public's trust. When issues are identified, they are taken seriously, prompt action is taken to address them, and processes are reviewed to help prevent similar situations in the future.