

Flores, Valerie

From: Mohammad Tajsar <MTajsar@aclusocal.org>
Sent: Wednesday, September 16, 2020 2:08 PM
To: Flores, Valerie
Subject: Letter to public safety committee re: today's meeting
Attachments: 2020 09 16 Privacy for All Ltr to PSC re Vigilant ALPR acquisition.pdf

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Dear City Clerk,

On behalf of Pasadena Privacy for All, a coalition of local community organizations, I'd like to submit the attached letter for inclusion in the public record regarding today's Public Safety Committee meeting, Agenda Item #2. We would appreciate it if the letter can be forwarded to members of the Committee for their review prior to the meeting.

Should any member have any questions about it, feel free to direct them to me.

Regards,

Mohammad Tajsar (he/him)
Senior Staff Attorney
ACLU of Southern California
1313 W 8th Street, Suite 200
Los Angeles, CA 90017

September 16, 2020

RE: Public Safety Committee Meeting – September 16, 2020
Agenda Item #2
Proposed Acquisition of Replacement ALPR Hardware and Equipment

Dear Members of Public Safety Committee,

Pasadena Privacy for All is a coalition of individuals and organizations dedicated to protecting the civil rights and privacy of Pasadena residents and visitors. Our organizational members include Pasadenans Organizing for Progress, the ACLU of Southern California, and Coalition for Increased Civilian Oversight of Pasadena Police. We write to oppose the proposed acquisition of additional Automated License Plate Reader devices from Vigilant Solutions, for three reasons. First, ALPR systems constitute an unnecessary and privacy-invasive technology that has not been demonstrated empirically to increase public safety. They provide Pasadena Police Department officers with an unnecessary amount of information about people's movements and driving behaviors, and are known to create an unnecessary danger of false positives.

Second, continuing to expand the City's relationship with Vigilant Solutions is a threat to immigrants within our community and to our status as a sanctuary city. It is well documented that federal immigration authorities collect Vigilant's license plate data, whether or not the police department using the systems chooses to explicitly share data with ICE. Because Vigilant contracts widely with numerous Department of Homeland Security components as well as various data aggregators and intermediaries, ICE develops has access to Vigilant license plate data. This is a grave danger to all immigrants who live or drive through Pasadena. The presence of Vigilant ALPR systems in the City places immigrants within our community under threat of immigration enforcement at a time when their lives are already made uniquely vulnerable by the Trump Administration.

Third, Pasadena Police Department's policy on the use of ALPR systems provides little comfort to Pasadena residents and community members that their sensitive location data will not be stored unnecessarily or shared with others. The policy says that ALPR data will be stored for a minimum of two years, regardless of whether it is necessary for an active criminal investigation or not. Further, the policy requires regular audits and maintenance of data sharing requests from other departments who want Pasadena's data. But in response to a Public Records Act request submitted by our organization, the City confirmed that it has no records of any audits of the ALPR system or any

records of data sharing requests—a violation not just of Pasadena policy, but of state law. In sum, the policy governing ALPR use by the Police Department is either too permissive, or regularly broken.

We urge this Committee to exercise its oversight authority to reject this acquisition, and to commit to serving Pasadena community members with solutions to their public safety needs that do not depend on rights-invasive technologies.

Sincerely yours,

Mohammad Tajsar
Member
Pasadena Privacy for All