OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF

December 11, 2025

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

REPORT BACK ON MOTION ON SAFEGUARDING AUTOMATED LICENSE PLATE READERS DATA TO RESTORE COMMUNITY TRUST AND PREVENT IMPROPER CIVIL IMMIGRATION ENFORCEMENT

On September 16, 2025, the Board adopted a motion (the "Motion") entitled "Safeguarding Automated License Plate Readers (ALPR) Data to Restore Community Trust and Prevent Improper Civil Immigration Enforcement."

The Motion requests the Los Angeles County Sheriff's Department (LASD or Department), in consultation with County Counsel, to:

1. Within 90 days, amend LASD's ALPR Privacy Policy to ensure that:

    a. ALPR data shall not be disclosed, transferred, or otherwise made available for civil immigration-enforcement purposes, except when disclosure is expressly required by State or County law or pursuant to a judicial warrant.
    b. Any permissible disclosure is subject to documented review and written authorization by a designated Custodian of Records.
    c. Access controls, authentication requirements, purpose limitations, and retention periods fully comply with SB 34, SB 54, and SB 274, if it is signed into law.

2. Ensure the Advance Surveillance and Protection Unit (ASAP), which as the LASD ALPR System and Data Custodian of Records, maintains a record of each data request's basis and outcome.

3. Request LASD to provide the Office of Inspector General (OIG), the Civilian Oversight Commission (COC), and the Board with a semi-annual written report summarizing ALPR data or system access logs (redacted for the COC as legally necessary) that identifies the requesting entity, data range, and statutory authority relied upon to disclose information.

4. Request that each LASD employee or contractor with ALPR credentials complete training that covers:

   a. SB 54 restrictions on immigration cooperation,
   b. SB 34 privacy requirements,
   c. SB 274, if it is signed into law, restrictions on accessing data for vehicles or persons when either are reasonably suspected of being involved in the commission of a public offense and deleting ALPR information that has been held for more than 60 days and does not match information on an authorized hot list (lists of license plates of vehicles of interest),
   d. LASD's updated ALPR policy, and
   e. Require that refresher training shall occur annually, and completion records shall be transmitted to the OIG and COC.

5. Review all current memoranda of understanding or other data-sharing agreements and terminate or renegotiate any provision that permits ALPR disclosures for civil immigration enforcement beyond what State or County law allows.

6. Request LASD implement the ALPR related recommendations provided by the Office of Inspector General's April through June 2025 Reform and Oversight Efforts: Los Angeles County Sheriff's Department report.

7. Request LASD to report back in writing within 120 days on updated ALPR Privacy Policy, implementation status of the above directives, resource needs, and any recommended legislative advocacy to bolster statewide ALPR safeguards.

Regarding the above provisions, the Department has taken the following steps:

- In consultation with County Counsel, the Department has drafted amendments to the ALPR Privacy Policy, incorporating all provisions requested by the Board, including restrictions on immigration enforcement use, disclosure requirements, and compliance with SB 34 and SB 54. The provisions related to SB 274 were not included since it was not enacted into law. These draft revisions were completed within the 90-day timeframe established by the Motion.

- The Department confirms that the Advanced Surveillance and Protection (ASAP) Unit, as the ALPR System and Data Custodian of Records, already maintains a record of the basis for each data request and that this practice remains in effect.

- The Department has incorporated the Board's request into the revised ALPR Privacy Policy by establishing a new requirement for semi-annual written reports to the OIG, the COC, and the Board, which include all specified reporting elements and any necessary redactions as required by law.

- The Department has incorporated the Board's training suggestions into the revised ALPR Privacy Policy, including instruction on SB 54, SB 34, and the updated Department policy, as well as annual refresher training with completion records transmitted to the OIG and COC. The provisions related to SB 274 were not included, as SB 274 was not enacted into law.

- The Department has confirmed that no current memoranda of understanding or data-sharing agreements permit ALPR disclosures for civil immigration enforcement, as such disclosures would not comply with the mandates of SB 34 or SB 54. The Department remains in full compliance with these statutes and will continue to ensure that all agreements reflect these requirements.

- The Department has met with the OIG regarding the revision of the ALPR Privacy Policy and has incorporated the OIG's prior ALPR-related recommendations, including those identified in the April through June 2025 Reform and Oversight Efforts report, into the updated policy.

- The Department transmitted the revised ALPR Privacy Policy to the COC for review and input. Following incorporation of any additional feedback from the COC, OIG, or County Counsel, the Department will present the final revision to the impacted labor unions due to the new training requirements, which may impact work conditions. While no significant delays are anticipated, the meet-and-confer process may affect the timeline, it is highly unlikely that the ALPR Privacy Policy will be enacted within the 120-day deadline of January 14, 2026.

CONCLUSION

The Department is currently awaiting additional input from the COC, the OIG, and County Counsel. Following incorporation of any further recommendations, the Department will present the final policy to the impacted labor unions due to the new training requirements. While no significant delays are anticipated, the meet-and-confer process is likely to impact the implementation timeline, and it is unlikely that the Department will be able to fully enact the revised ALPR Privacy Policy by the 120-day

deadline of January 14, 2026.

Accordingly, the Department respectfully requests an extension from the prior deadline of January 14, 2026, to ensure that the bargaining units have an opportunity to review the proposed training provisions, that the necessary online training infrastructure is fully established, and that any unforeseen operational challenges such as those related to reporting and auditing requirements are appropriately addressed.

As a result, the Department proposes providing the Board with a further update on this matter by the existing deadline of January 14, 2026, and then providing an update every 90 days thereafter until the new policy is enacted.

Should you have any questions, please have your staff contact Commander Ernest Bille, Office of Constitutional Policing, at (323) 307-8358.

Sincerely,

R. Luna

ROBERT G. LUNA
SHERIFF

RGL:EMD:EB:
(Office of Constitutional Policing Policing)

c: Board of Supervisors, Justice Deputies
Edward Yen, Executive Officer, Board of Supervisors
Joe Nicchitta, Acting Chief Executive Officer
Rene Phillips, Manager, Chief Executive Office (CEO)
Anna Petrosyan, Senior Analyst, CEO
Michael Xie, Senior Budget Analyst, CEO
Dawyn R. Harrison, County Counsel
Timothy J. Kral, Chief Legal Advisor, Legal Advisory Unit
Michele Jackson, Principal Deputy County Counsel, Legal Advisory Unit
Sharmaine Moseley, Executive Director, Civilian Oversight Commission
Max Huntsman, Office of Inspector General
April L. Tardy, Undersheriff
Gerardo J. Pinedo, Assistant Sheriff, CFAO
Sergio V. Escobedo, Chief of Staff, Office of the Sheriff
Eileen M. Decker, Division Director, Office of Constitutional Policing (OCP)
Conrad Meredith, Division Director, Administrative Services Division (ASD)
Ernest Bille, Commander, OCP
Richard F. Martinez, Assistant Division Director, ASD
David C. Sum, Commander, Technology and Support Division
David E. Culver, Bureau Director, Financial Programs Bureau
Marshall R. Yelverton, Captain, Communications and Fleet Management Bureau
Oscar R. Butao, Lieutenant, ASD
Erica M. Nunes, Sergeant, ASD
Kristine D. Corrales, Deputy, ASD

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MOTION BY SUPERVISOR HILDA L. SOLIS September 16, 2025

Safeguarding Automated License Plate Readers (ALPR) Data to Restore Community Trust and Prevent Improper Civil Immigration Enforcement

The Los Angeles County Automated License Plate Readers (ALPR), managed and operated by the Los Angeles County Sheriff's Department (LASD), remains a powerful investigative tool for recovering stolen vehicles, identifying violent crime suspects, and finding missing persons. Yet its public support depends on unshakable confidence that the sensitive location data it generates will never be repurposed for impermissible civil-immigration enforcement.

As highlighted in a June 2025 CalMatters article, State of California (State) law enforcement agencies have repeatedly shared license plate reader data with federal immigration authorities, despite State laws intended to prevent such cooperation.[1] The database of queries collected by Oakland Privacy revealed that law enforcement agencies across Southern California shared information from automated ALPR with federal agents, including Immigration and Customs Enforcement (ICE).[2] [3] Among the

[1]California Police are illegally sharing license plate data with ICE and Border Patrol, https://calmatters.org/economy/technology/2025/06/california-police-sharing-license-plate-reader-data/#:~:text=Under%20a%2010%2Dyear%2Dold,listed%20as%20a%20search%20purpose.
[2]Id.
[3]Oakland Privacy ALPR Database, https://oaklandprivacy.org/ca-automated-license-plate-readers-alpr-and-ice/

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ten law enforcement agencies that conducted searches on behalf of ICE, six are in Los Angeles County.[4]

While LASD was not one of the law enforcement agencies that conducted searches on behalf of ICE, in a place like Los Angeles County, where residents depend on cars for nearly every aspect of daily life, people must feel safe traveling from place to place without fear that their movements are being tracked, stored, and shared in ways that violate their privacy. These ALPR data sharing incidents only help to reignite fear in immigrant communities and further erode public trust in Southern California's public-safety institutions.

The California legislature has already erected guardrails. The California Values Act (SB 54)[5] bars local agencies from assisting with most civil-immigration actions, and SB 34 (Civil Code §§ 1798.90.50-.55)[6] requires every ALPR operator to publish a public usage-and-privacy policy, train users, and log every query and export. LASD adheres to the logging mandate, but logging alone is insufficient to prevent misuse and restore community confidence.

SB 274 (Cervantes)[7] would strengthen Statewide safeguards by capping retention of non-hit plate reads at sixty days, mandating robust authentication, annual State Department of Justice audits, and yearly privacy training for users. Earlier Senate

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[4]Id.
[5]SB 54 text, https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB54
[6]SB 34 text, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB34
[7]SB 274 text, https://leginfo.legislature.ca.gov/faces/billHistoryClient.xhtml?bill_id=202520260SB274

versions of SB 274 went further,[8] explicitly prohibiting the collection or sharing of ALPR sensitive geolocation data (such as the location of schools, courthouses, shelters, and health facilities) for civil immigration enforcement purposes. Although that language was removed in the May 23, 2025, Senate amendments, Los Angeles County can lead the State by formally adopting those protections locally, while embracing SB 274's remaining reforms.

By restoring the bill's original immigration safeguards, tightening retention limits and access controls, and subjecting the entire program to independent oversight through the Office of Inspector General (OIG) and Civilian Oversight Commission (COC), the County can rebuild public trust and ensure that its ALPR resources are never leveraged for civil-immigration enforcement beyond the narrow limits permitted by State law and County policy.

I, THEREFORE, MOVE that the Board of Supervisors suspend Section 22.1 of the Rules of the Board for the limited purpose of considering this motion.

I, FURTHER, MOVE that the Board of Supervisors direct the Chief Executive Office's Legislative Affairs and Intergovernmental Relations branch to support Senate Bill 274 (Cervantes), and send a 5-signature letter in support of the bill to Governor Newsom should the bill make it to his desk.

I, FURTHER, MOVE that the Board of Supervisors request Los Angeles Sheriff's

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[8]SB 274 earlier text, https://legiscan.com/CA/text/SB274/id/3227469

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and any recommended legislative advocacy to bolster statewide ALPR safeguards.

I, FURTHER, MOVE that the Board of Supervisors direct that starting January 1, 2026:

1. The OIG to:
    a. Conduct annual compliance reviews of LASD's ALPR audit-log summaries, training rosters, and any alleged violations.
    b. Publish an annual report outlining findings, corrective actions, and further policy recommendations.
2. The COC to:
    a. Host at least one multilingual community forum a year on LASD's ALPR Privacy Policy to gather resident input and share oversight results, ensuring community voices remain central to this process.

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