

**OFFICE OF THE INDEPENDENT POLICE AUDITOR
CITY OF AKRON, OHIO**

September 17, 2026

VIA ELECTRONIC MAIL

To: Chief Brian Harding
Akron Police Department

**Re: OIPA Audit of APD Flock Safety/Automated License Plate Reader Program —
Document and Data Request**

Chief Harding:

The Office of the Independent Police Auditor (“OIPA”) is initiating an independent audit of the Akron Police Department’s deployment, administration, use, access, oversight, information sharing, retention, and governance of the Flock Safety automated license plate reader (“ALPR”) system.

The audit will evaluate APD’s Flock/ALPR program from the perspectives of legal and policy compliance, authorized use, privacy and civil-rights protections, access controls, data sharing, alert verification, supervisory oversight, accountability, transparency, and operational effectiveness. The review will include both an assessment of APD’s overall governance framework and transaction-level testing of system activity.

Attached as **Attachment A** is OIPA’s **Comprehensive APD Flock Audit Document and Data Request**, which identifies the records and electronic data necessary to conduct the audit.

Because transaction-level testing requires OIPA to independently identify the audit population and select records for review, APD is requested to provide the complete underlying populations identified in Attachment A rather than APD-selected samples, summaries, aggregate reports, screenshots, or examples of system activity.

Where responsive information is maintained electronically, OIPA requests that it be produced in its native or most complete machine-readable format, such as CSV, XLSX, JSON, XML, SQL export, or other structured system export, with original data fields and unique identifiers preserved. Policies, contracts, memoranda, training materials, and similar documentary records may be provided in PDF or their native format.

If a requested field, dataset, historical record, audit log, or other category of information cannot be produced directly by APD, please identify the specific item and the reason it is unavailable. Where the information may be maintained or retrievable by Flock Safety but is not directly accessible to APD, please request the information from the vendor or advise OIPA of the technical limitation so that the matter can be addressed.

Given that some Flock records may be subject to automatic retention or deletion periods, APD is also requested to take reasonable steps to preserve records responsive to the audit while the review is pending.

To permit OIPA to begin validating the audit population and developing its sampling methodology while the remaining production is assembled, Attachment A establishes a prioritized production sequence. OIPA requests that the **Priority 1 electronic data sets be produced first**, followed by the remaining materials on a rolling basis.

Please provide Priority 1 production by **November 6, 2026**, with the remaining responsive records produced by **December 15, 2026**, or advise OIPA promptly if APD anticipates a material difficulty meeting those dates. Questions concerning the requested fields, production format, system limitations, or scope should be raised before responsive data are filtered, reformatted, summarized, or excluded.

OIPA appreciates APD's cooperation with this review. The objective is to conduct a thorough, evidence-based, and independent assessment that identifies effective practices as well as opportunities to strengthen governance, accountability, privacy protections, and responsible use of this technology.

Sincerely,



Anthony W. Finnell
Independent Police Auditor
Office of the Independent Police Auditor
City of Akron, Ohio

Attachment A: Comprehensive APD Flock Audit Document and Data Request

COMPREHENSIVE DOCUMENT AND DATA REQUEST

AKRON POLICE DEPARTMENT FLOCK SAFETY / AUTOMATED LICENSE PLATE READER PROGRAM AUDIT

Issued by: Office of the Independent Police Auditor

To: Akron Police Department

Audit Subject: Flock Safety / Automated License Plate Reader Program

Audit Period: January 1, 2024 – August 31, 2026

Request Date: September 17, 2026

Requested Production Date: November 6, 2026

I. PURPOSE OF REQUEST

The Office of the Independent Police Auditor (“OIPA”) is conducting an independent audit of the Akron Police Department’s (“APD”) acquisition, deployment, administration, use, access, oversight, information sharing, retention, auditing, and operational effectiveness of the Flock Safety automated license plate reader (“ALPR”) system and related functionality.

This request is intended to obtain the complete documentary and electronic record necessary to evaluate APD’s Flock/ALPR program at both the program level and the individual transaction level.

OIPA’s audit methodology requires access to complete source populations, native electronic exports, underlying audit logs, historical user and configuration records, and supporting documentation sufficient to independently reconstruct and test Flock activity.

Accordingly, APD should not limit its production to selected examples, screenshots, summaries, presentations, aggregate statistics, supervisory reports, or records chosen by APD personnel unless specifically requested.

Where responsive information exists in an electronic system, OIPA requests production in the most complete, structured, and machine-readable format reasonably available.

II. GENERAL PRODUCTION INSTRUCTIONS

A. Complete Population Required

Unless otherwise specified, each request seeks the complete population of responsive records for the audit period.

APD should not:

- select only records it considers relevant;
- select only records associated with arrests or successful investigations;
- produce only records previously audited internally;
- exclude canceled, unsuccessful, erroneous, incomplete, or nonproductive searches;
- exclude transactions because no enforcement action resulted;
- exclude searches because a case number was not entered;
- exclude records created by former, transferred, suspended, or inactive personnel;
- exclude records involving external agencies; or
- substitute a sample for the complete population.

If the volume of a requested dataset presents a production issue, APD should notify OIPA before reducing or filtering the requested population.

B. Native Electronic Format

Where information is maintained electronically, OIPA requests production in native or machine-readable form.

Preferred formats include:

- CSV;
- XLSX;
- JSON;
- XML;
- SQL export;
- structured system export; or
- another database-readable format preserving discrete data fields.

PDF production is acceptable for policies, memoranda, reports, correspondence, contracts, training materials, and similar documentary records.

PDFs, screenshots, printed reports, or images should **not** be substituted for native database exports when the underlying information is stored in structured electronic form.

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C. Preserve Original Fields

Electronic datasets should retain all fields available in the source system, including fields not specifically identified in this request where reasonably available.

APD should not:

- merge discrete fields;
- rename fields without providing a data dictionary;
- truncate text fields;
- remove zero-value records;
- remove blank fields;
- deduplicate records unless the source system itself identifies them as duplicates; or
- reformat dates or identifiers in a manner that prevents linkage between datasets.

If APD creates a derived dataset specifically for OIPA, the original source export should also be preserved and, where reasonably practicable, produced.

D. Date and Time Information

All electronic records should preserve:

- original date;
- original time;
- time zone;
- seconds, if available;
- creation timestamp;
- modification timestamp;
- expiration timestamp; and
- deletion or deactivation timestamp, where applicable.

If a system stores times in UTC or another time zone, APD should identify the time zone and any conversion performed before production.

E. Unique Identifiers

All available unique identifiers should be preserved, including:

- query IDs;
- event IDs;
- alert IDs;
- user IDs;

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- account IDs;
- camera/device IDs;
- hot-list IDs;
- plate-entry IDs;
- export IDs;
- case numbers;
- CAD numbers;
- incident numbers;
- report numbers;
- agency IDs; and
- transaction IDs.

These identifiers are necessary to link related datasets.

F. Data Dictionary

For every structured dataset produced, APD should provide a corresponding data dictionary identifying:

1. Field name;
2. Field definition;
3. Data type;
4. Permissible values;
5. Code meanings;
6. Whether the field is mandatory or optional;
7. Whether the field is user-entered or system-generated;
8. Whether the field has changed during the audit period; and
9. Any known limitations affecting interpretation.

If Flock Safety maintains a vendor-generated data dictionary, schema description, export guide, or audit-log field description, please provide it.

G. Records Unavailable From Flock

For every field, record type, or category requested below that Flock Safety cannot produce, APD should identify:

1. The specific requested item;
2. Whether the information does not exist, is not retained, is technically inaccessible, or is unavailable to APD;
3. Whether Flock Safety possesses the information;
4. Whether APD requested the information from Flock Safety;

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5. Flock Safety’s response;
6. Whether the information was previously available but is no longer retained;
7. Applicable retention period;
8. Date the information ceased to be available, if known; and
9. Any alternative source through which substantially similar information can be obtained.

A statement that “the system does not provide this” should identify whether that conclusion came from APD, Flock Safety, or another source.

H. Vendor Assistance

If APD cannot directly generate a complete response from the Flock platform, APD should request vendor assistance where reasonably necessary.

OIPA requests copies of communications with Flock Safety concerning:

- data extraction;
- audit logs;
- historical user information;
- deleted or inactive accounts;
- sharing history;
- hot-list history;
- configuration history;
- search logs;
- alert records;
- retention;
- technical limitations; and
- fields that cannot be produced.

I. No Destructive Alteration

Following receipt of this request, APD should take reasonable steps to preserve potentially responsive Flock records that may otherwise be deleted or overwritten pursuant to ordinary retention schedules.

This request does not require APD to alter operational retention settings unless separately directed or authorized. It does require preservation of responsive audit records and supporting information reasonably necessary to complete the audit.

III. AUDIT PERIOD AND HISTORICAL RECORDS

Unless otherwise specified, produce responsive records for:

Primary Audit Period:

January 1, 2024, through August 31, 2026

Additionally, for governance, procurement, implementation, user access, configuration, sharing relationships, complaints, discipline, and camera deployment, produce responsive records from:

Program inception through the date of production.

Where responsive records fall outside the primary audit period but explain activity occurring within it, they should also be produced.

IV. PROGRAM GOVERNANCE, AUTHORIZATION, AND PROCUREMENT

Produce all documents concerning the authorization, acquisition, implementation, expansion, administration, or governance of APD's Flock/ALPR program, including:

1. Original proposals;
2. Business cases;
3. Needs assessments;
4. Procurement requests;
5. Requests for proposals;
6. Vendor submissions;
7. Bid documents;
8. Sole-source justifications;
9. Purchase orders;
10. Contracts;
11. Master service agreements;
12. Statements of work;
13. Amendments;
14. Renewal agreements;
15. Pricing schedules;
16. Licensing agreements;
17. Data-processing agreements;
18. Service-level agreements;
19. Security agreements;

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20. Insurance and indemnification provisions;
21. Data ownership provisions;
22. Data-retention provisions;
23. Data-sharing provisions;
24. Vendor-access provisions;
25. Subprocessor information;
26. Termination provisions;
27. Data-return or deletion provisions upon contract termination;
28. Funding authorizations;
29. Grant applications;
30. Grant awards;
31. Federal or state funding documentation;
32. City Council legislation or approvals;
33. Mayor or administration approvals;
34. Legal Department reviews;
35. privacy reviews;
36. privacy impact assessments;
37. technology impact assessments;
38. internal memoranda;
39. command approvals;
40. implementation plans; and
41. documents describing subsequent expansion of the system.

V. CURRENT AND HISTORICAL POLICIES, RULES, AND PROCEDURES

Produce all current and historical versions of APD policies, rules, procedures, directives, manuals, SOPs, training bulletins, legal bulletins, roll-call materials, or instructions addressing:

- Flock Safety;
- ALPR;
- license plate recognition;
- intelligence databases;
- criminal intelligence;
- investigative databases;
- information sharing;
- hot lists;
- BOLOs;
- stolen vehicle alerts;
- wanted person/vehicle information;
- surveillance technology;

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- data retention;
- privacy;
- First Amendment activity;
- demonstrations;
- sensitive investigations;
- law-enforcement database use;
- unauthorized database access;
- computer misuse;
- cybersecurity;
- auditing;
- user access;
- account management;
- data export;
- evidence retention; and
- disclosure of Flock/ALPR information.

For each policy, identify its effective dates.

VI. FLOCK PRODUCT AND FUNCTIONALITY INVENTORY

Provide a complete inventory of every Flock Safety product, module, capability, feature, integration, or service available to APD during the audit period.

For each, provide:

1. Product/module name;
2. Description;
3. Date acquired;
4. Date activated;
5. Date deactivated, if applicable;
6. Number of licenses;
7. Authorized users;
8. Available search capabilities;
9. Alert capabilities;
10. analytical capabilities;
11. network-search capabilities;
12. geospatial capabilities;
13. vehicle-description capabilities;
14. image capabilities;
15. hot-list capabilities;
16. sharing capabilities;
17. export/download capabilities;

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18. retention setting;
19. data sources;
20. external integrations; and
21. whether the feature was enabled by default or specifically activated by APD.

Provide documents identifying all functionality that was added, removed, enabled, disabled, or materially changed during the audit period.

VII. CAMERA AND DEVICE INVENTORY

Provide a complete machine-readable inventory of every Flock camera or related ALPR device:

- owned by APD;
- leased by APD;
- funded by APD;
- operated for APD;
- accessible to APD through a local partnership; or
- otherwise designated as part of APD's Flock deployment.

Include, where available:

1. Camera/device ID;
2. Device serial number;
3. Flock system identifier;
4. Device name;
5. Street address;
6. intersection;
7. GPS latitude;
8. GPS longitude;
9. city;
10. ZIP code;
11. direction of travel;
12. field of view;
13. camera type;
14. installation date;
15. activation date;
16. deactivation date;
17. current status;
18. relocation history;
19. previous locations;
20. funding source;
21. owner;

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22. operational entity;
23. installation cost;
24. recurring cost;
25. maintenance history;
26. reason for placement;
27. crime/public-safety justification;
28. approving official;
29. approval date;
30. associated neighborhood or district;
31. associated patrol zone/beat;
32. whether camera captures more than one lane/direction;
33. whether camera is fixed or mobile;
34. whether camera is visible to external agencies; and
35. applicable sharing settings.

Also provide all records documenting decisions to install, relocate, deactivate, or remove cameras.

VIII. COMPLETE USER AND ACCOUNT POPULATION

Produce a complete machine-readable list of every person or account that had access to the APD Flock environment at any point during the audit period.

Include active, inactive, deleted, disabled, suspended, transferred, separated, retired, and administrative accounts.

For each account, provide:

1. User/account ID;
2. employee name;
3. employee identification number;
4. rank/title;
5. assignment;
6. unit;
7. bureau/division;
8. email address used for the account;
9. account creation date;
10. account activation date;
11. account deactivation date;
12. deletion date;
13. account status;
14. last login;
15. first login;

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16. first search;
17. last search;
18. permission level;
19. role;
20. administrative privileges;
21. hot-list privileges;
22. export privileges;
23. sharing privileges;
24. network-search privileges;
25. ability to modify system settings;
26. training completion date;
27. training expiration date;
28. date of most recent access review;
29. account sponsor/approver;
30. approving supervisor; and
31. reason for access.

Identify all generic, shared, service, vendor, API, system, or non-person-specific accounts separately.

IX. ACCOUNT AND PERMISSION HISTORY

Produce all available historical records showing:

- creation of user accounts;
- changes in user roles;
- changes in permissions;
- elevation to administrator;
- removal of administrator status;
- assignment changes;
- access suspensions;
- access terminations;
- password resets;
- multi-factor authentication changes;
- login failures;
- account lockouts;
- unusual login events; and
- user-access reviews.

If complete historical permission records are not available, identify the date range for which permission history can be reconstructed.

X. COMPLETE FLOCK SEARCH / QUERY AUDIT LOG

Produce the complete machine-readable population of every search or query performed by any APD user during the audit period.

Do not limit production to searches returning results.

Include failed, zero-result, canceled, incomplete, broad, network, plate, partial-plate, vehicle-description, location, time-range, and other searches.

For each query, provide every available field, including:

1. Unique query/search ID;
2. user ID;
3. user name;
4. employee ID;
5. date;
6. time;
7. timestamp;
8. time zone;
9. search type;
10. search category;
11. plate searched;
12. partial plate;
13. issuing state;
14. plate type;
15. vehicle make;
16. vehicle model;
17. vehicle type;
18. vehicle color;
19. vehicle characteristics;
20. vehicle-description criteria;
21. unique vehicle attributes;
22. date range searched;
23. time range searched;
24. historical lookback period;
25. geographic area searched;
26. radius searched;
27. map coordinates;
28. cameras searched;
29. camera groups searched;
30. APD-only versus network search;
31. external agencies/databases searched;

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32. search justification;
33. purpose category;
34. user-entered narrative;
35. case number;
36. CAD number;
37. incident number;
38. report number;
39. crime type;
40. result count;
41. images returned;
42. images opened/viewed;
43. search duration;
44. refinement of earlier query;
45. related query ID;
46. export/download indicator;
47. sharing indicator;
48. recipient, if shared;
49. hot-list association;
50. alert association;
51. saved-search indicator;
52. notification created;
53. search source/IP/device, if available;
54. location of user at time of search, if logged;
55. browser/session identifier, if available; and
56. any audit or system metadata associated with the transaction.

If Flock logs a justification but not a formal case number, preserve the complete free-text justification exactly as entered.

XI. SEARCH RESULTS AND IMAGE ACCESS

For each query, produce available logs identifying:

- result count;
- records returned;
- plates displayed;
- vehicle records displayed;
- camera source;
- image identifiers;
- images opened;
- images enlarged;
- images downloaded;

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- images exported;
- images printed;
- images shared; and
- records marked, saved, bookmarked, or preserved.

OIPA is not requesting production of every image captured by every camera unless separately requested.

The present request seeks sufficient logs to identify what records or images users accessed as part of selected searches.

XII. DOWNLOAD, EXPORT, AND DISSEMINATION LOGS

Produce the complete population of all Flock information downloaded, exported, printed, emailed, shared, or otherwise transferred from the system during the audit period, where logged.

Include:

1. Export ID;
2. date/time;
3. user;
4. query ID;
5. case number;
6. plate;
7. image/record ID;
8. export format;
9. destination;
10. recipient;
11. reason;
12. external agency;
13. method of transmission;
14. whether the record entered RMS/evidence/intelligence systems; and
15. subsequent retention location, if known.

XIII. HOT LISTS, WATCH LISTS, AND CUSTOM LISTS

Produce a complete machine-readable inventory and history of every hot list, watch list, custom list, BOLO list, alert list, or comparable plate-based list available to APD during the audit period.

For each list, provide:

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1. List ID;
2. list name;
3. list type;
4. source;
5. owner;
6. creation date;
7. creator;
8. approving authority;
9. purpose;
10. criteria;
11. expiration rules;
12. retention rules;
13. sharing settings;
14. agencies receiving alerts;
15. number of entries;
16. activation date;
17. deactivation date; and
18. modification history.

XIV. COMPLETE HOT-LIST ENTRY HISTORY

For every plate added to an APD-created, APD-maintained, or APD-controlled list during the audit period, provide:

1. Entry ID;
2. list ID;
3. plate;
4. state;
5. vehicle information;
6. person associated with vehicle, if recorded;
7. date/time added;
8. user adding entry;
9. employee ID;
10. justification;
11. case number;
12. CAD number;
13. report number;
14. offense/investigation;
15. source of information;
16. approving supervisor;
17. approval date;
18. requested alert duration;

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19. expiration date;
20. actual removal date;
21. user removing entry;
22. reason removed;
23. modification history;
24. number of alerts generated; and
25. whether the entry was renewed or extended.

Produce deleted, expired, and inactive entries as well as active entries.

XV. ALERT POPULATION

Produce the complete machine-readable population of Flock alerts received by or generated for APD during the audit period.

For each alert, provide:

1. Alert ID;
2. date/time;
3. plate;
4. state;
5. vehicle description;
6. camera/device ID;
7. camera location;
8. direction;
9. list/source generating alert;
10. reason for alert;
11. originating agency;
12. receiving user/unit;
13. dispatch notification;
14. CAD number;
15. acknowledgment time;
16. response time;
17. user opening alert;
18. verification status;
19. alert disposition;
20. enforcement indicator;
21. related stop;
22. arrest indicator;
23. vehicle recovery;
24. false/incorrect alert indicator;
25. correction action; and

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26. linked incident/report number.

If APD does not maintain disposition fields within Flock, identify the APD system where outcomes can be linked.

XVI. ALERT-RELATED CAD AND ENFORCEMENT RECORDS

Provide a machine-readable list, to the extent identifiable, of all:

- CAD events;
- traffic stops;
- investigative detentions;
- vehicle stops;
- searches;
- pursuits;
- arrests;
- stolen vehicle recoveries;
- missing-person recoveries;
- firearm recoveries;
- contraband recoveries; and
- other enforcement events

that were initiated, substantially assisted, or materially informed by a Flock alert or Flock search during the audit period.

Include:

1. CAD number;
2. incident number;
3. date/time;
4. Flock alert/query ID;
5. officer;
6. vehicle plate;
7. reason for stop/action;
8. alert source;
9. verification performed;
10. outcome;
11. search conducted;
12. arrest;
13. citation;

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14. warning;
15. release/no action;
16. vehicle recovered;
17. evidence recovered; and
18. associated body-worn-camera event number, where available.

XVII. FALSE, INCORRECT, OR DISPUTED ALERTS

Produce all records concerning:

- false positive alerts;
- plate misreads;
- wrong-state matches;
- stale stolen-vehicle entries;
- recovered vehicles remaining on hot lists;
- incorrect custom-list entries;
- wrong vehicle stops;
- complaints concerning erroneous Flock alerts;
- officer reports identifying Flock errors;
- vendor trouble tickets;
- internal corrective action; and
- training or policy changes resulting from alert errors.

XVIII. INTERAGENCY SHARING — APD DATA PROVIDED TO OTHERS

Produce a complete list of every external agency, organization, jurisdiction, task force, fusion center, governmental entity, or other user that had access to APD-generated Flock data during the audit period.

For each, provide:

1. Agency/entity name;
2. ORI or identifier;
3. jurisdiction;
4. access start date;
5. access end date;
6. current status;
7. type of access;
8. cameras accessible;

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9. data accessible;
10. network permissions;
11. search permissions;
12. download permissions;
13. sharing permissions;
14. approval authority;
15. approving APD official;
16. legal basis;
17. MOU/agreement;
18. permitted purposes;
19. prohibited purposes;
20. audit provisions;
21. retention provisions;
22. secondary-sharing restrictions; and
23. revocation procedures.

XIX. EXTERNAL SEARCHES OF APD DATA

Produce the complete machine-readable population, where available, of searches conducted by non-APD users against APD-generated Flock data during the audit period.

Include:

1. Query ID;
2. external user;
3. external agency;
4. date/time;
5. plate/search criteria;
6. case number;
7. justification;
8. purpose;
9. cameras searched;
10. result count;
11. export/download;
12. APD notification;
13. APD approval, if required; and
14. audit-review status.

If APD cannot see external searches of its data, expressly state that limitation and identify what Flock Safety can provide.

XX. APD ACCESS TO EXTERNAL FLOCK DATA

Produce all records identifying external cameras, agencies, networks, or data sources APD could search during the audit period.

For each, provide:

1. Agency/entity;
2. jurisdiction;
3. camera/data scope;
4. access start date;
5. access end date;
6. authorization;
7. MOU/agreement;
8. applicable limitations;
9. retention limitations;
10. dissemination limitations; and
11. auditing provisions.

Identify whether APD can conduct nationwide, statewide, regional, or other network searches.

XXI. DATA-SHARING AGREEMENTS

Produce all current and historical:

- MOUs;
- MOAs;
- data-sharing agreements;
- regional agreements;
- task-force agreements;
- federal agreements;
- state agreements;
- fusion-center agreements;
- informal written sharing arrangements;
- approval emails; and
- Flock network-sharing configuration documents

governing external access to APD Flock information or APD access to external Flock information.

XXII. RETENTION AND DELETION SETTINGS

Provide complete documentation of all Flock retention settings applicable during the audit period.

Identify:

1. Default retention period;
2. APD-selected retention period;
3. changes during audit period;
4. effective date of each change;
5. approving official;
6. reason for change;
7. captured image retention;
8. query-history retention;
9. alert-history retention;
10. user-audit-log retention;
11. hot-list-history retention;
12. export-log retention;
13. administrative-log retention;
14. deleted-user retention;
15. externally shared data retention; and
16. backup/archive retention.

Provide screenshots or configuration reports in addition to structured exports where they help establish system settings.

XXIII. DATA PRESERVED OUTSIDE FLOCK

Provide policies and records sufficient to determine what occurs when Flock information is:

- downloaded;
- exported;
- placed into RMS;
- attached to reports;
- stored as evidence;
- emailed;
- placed into an intelligence system;
- stored on shared drives;
- used in warrant affidavits; or
- otherwise retained outside Flock.

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Identify applicable retention schedules for each repository.

XXIV. TRAINING RECORDS

Produce all Flock/ALPR training materials, including:

- lesson plans;
- curricula;
- PowerPoints;
- videos;
- instructor guides;
- student guides;
- tests;
- quizzes;
- roll-call training;
- policy acknowledgments;
- legal updates;
- supervisory training;
- administrator training; and
- refresher training.

Also provide a machine-readable roster of all personnel trained during the audit period, including:

1. Employee name;
2. employee ID;
3. rank;
4. assignment;
5. course title;
6. training date;
7. instructor;
8. score, if applicable;
9. pass/fail status;
10. retraining date;
11. acknowledgment of policy; and
12. Flock account activation date.

XXV. INTERNAL AUDITS AND SUPERVISORY REVIEWS

Produce all records of APD reviews of Flock activity, including:

- periodic audits;

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- user audits;
- random audits;
- targeted audits;
- supervisory reviews;
- compliance reviews;
- access reviews;
- hot-list audits;
- sharing audits;
- unusual activity reviews;
- reports generated by Flock administrative tools;
- audit exceptions;
- findings;
- corrective action plans;
- retraining;
- counseling; and
- discipline.

For each internal audit, identify:

1. Reviewer;
2. review period;
3. population;
4. sample-selection method;
5. sample size;
6. criteria;
7. exceptions;
8. findings;
9. corrective action;
10. follow-up; and
11. closure date.

XXVI. COMPLAINTS, INVESTIGATIONS, AND DISCIPLINE

Produce all complaints, allegations, investigations, referrals, or disciplinary matters involving:

- Flock;
- ALPR;
- unauthorized plate searches;
- misuse of police databases;
- improper intelligence searches;
- personal searches;
- stalking or harassment using law-enforcement information;

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- unauthorized sharing;
- improper download/export;
- improper access;
- misuse of hot lists;
- failure to verify an alert; or
- improper surveillance involving vehicle-location information.

For each matter, provide:

- complaint number;
- date;
- allegation;
- employee;
- investigative disposition;
- findings;
- discipline;
- counseling;
- retraining;
- access restriction; and
- final outcome.

XXVII. SECURITY AND SYSTEM ACCESS CONTROLS

Produce documents describing security controls applicable to APD's Flock environment, including:

- authentication;
- multi-factor authentication;
- password standards;
- session controls;
- remote access;
- IP restrictions;
- role-based access;
- administrator controls;
- audit-log protection;
- logging;
- intrusion detection;
- unusual access alerts;
- vendor administrative access;
- employee offboarding;
- account review;
- cybersecurity incident response; and

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- security assessments.

Produce records of any cybersecurity incidents, unauthorized-access events, compromised accounts, or suspected data exposure involving APD Flock information during the audit period.

XXVIII. VENDOR ACCESS

Identify all circumstances in which Flock Safety employees, contractors, subprocessors, support personnel, or other vendor representatives can access APD data.

Provide:

1. Role;
2. purpose;
3. authorization;
4. logging;
5. auditability;
6. retention;
7. geographic location of support/data access;
8. support tickets involving APD data; and
9. records of actual vendor access during the audit period, where available.

XXIX. FLOCK SYSTEM CONFIGURATION HISTORY

Produce all available records showing changes to:

- retention;
- user permissions;
- administrator privileges;
- camera sharing;
- agency sharing;
- network access;
- alert settings;
- hot-list settings;
- search requirements;
- justification requirements;
- mandatory case-number fields;
- geographic settings;
- notification settings;
- user groups;
- camera groups;

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- integrations; and
- privacy/security configurations.

For each change, identify:

1. Date/time;
2. prior setting;
3. new setting;
4. user making change;
5. approving authority; and
6. stated reason.

XXX. REQUIRED SEARCH-JUSTIFICATION FIELDS

Provide documentation identifying what users are required to enter before conducting a Flock search.

Identify:

- whether a justification is mandatory;
- whether a case number is mandatory;
- whether predefined purpose categories exist;
- whether free text is required;
- minimum character requirements;
- whether users can enter generic terms;
- whether system administrators can modify requirements; and
- the historical configuration of these requirements during the audit period.

XXXI. SAVED SEARCHES, ALERT SUBSCRIPTIONS, AND NOTIFICATIONS

Produce records identifying any saved searches, recurring searches, subscriptions, notifications, or continuing vehicle alerts created by APD users during the audit period.

Include:

1. User;
2. creation date;
3. plate/criteria;
4. reason;

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5. case number;
6. duration;
7. expiration date;
8. number of notifications generated; and
9. deletion date.

XXXII. CAMERA PLACEMENT AND DEPLOYMENT JUSTIFICATION

For every existing and historical camera location, produce supporting documentation showing the reason for placement.

Include:

- crime analysis;
- calls-for-service analysis;
- stolen-vehicle analysis;
- traffic analysis;
- investigative need;
- community request;
- council request;
- neighborhood request;
- command request;
- grant requirement;
- tactical reason; and
- relocation rationale.

Identify who approved each deployment decision.

XXXIII. EFFECTIVENESS AND OUTCOME DATA

Produce all reports, spreadsheets, dashboards, memoranda, presentations, statistics, or analyses used by APD to assess Flock effectiveness.

Provide, if maintained:

- number of searches;
- number of alerts;
- arrests;
- stolen vehicles recovered;

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- firearms recovered;
- missing persons located;
- wanted persons located;
- contraband recovered;
- cases cleared;
- prosecutions supported;
- investigative leads;
- case assists;
- false alerts;
- erroneous stops;
- successful hits;
- unsuccessful hits; and
- other outcome measures.

Provide the methodology APD uses to attribute an outcome to Flock.

XXXIV. COST INFORMATION

Produce records showing the full cost of the Flock program, including:

- camera acquisition;
- installation;
- subscriptions;
- licensing;
- network fees;
- software modules;
- maintenance;
- relocation;
- replacement;
- connectivity;
- staffing;
- training;
- grant funding;
- overtime;
- administrative expense; and
- vendor professional services.

Provide annual costs by fiscal year.

XXXV. PUBLIC DISCLOSURE AND TRANSPARENCY

Produce all public-facing materials concerning APD’s Flock program, including:

- website content;
- transparency portal;
- FAQs;
- public presentations;
- press releases;
- media responses;
- community meeting materials;
- council presentations;
- privacy notices;
- maps;
- public statistics;
- annual reports; and
- public statements concerning retention, access, sharing, or effectiveness.

XXXVI. PUBLIC RECORDS REQUESTS

Produce a list of public-records requests concerning Flock/ALPR received during the audit period.

For each, provide:

- request date;
- general subject;
- disposition;
- records produced;
- records withheld;
- exemption asserted; and
- date closed.

OIPA does not initially request personally identifying information concerning the requester unless necessary for an identified audit issue.

XXXVII. LEGAL GUIDANCE AND LEGAL REVIEW

Produce legal memoranda, advisories, opinions, emails, or other written guidance provided to APD concerning:

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- legality of ALPR use;
- constitutional considerations;
- privacy;
- First Amendment implications;
- data retention;
- public records;
- interstate data sharing;
- immigration-related use;
- federal agency access;
- surveillance;
- warrant requirements;
- use in criminal investigations; and
- vendor contractual provisions.

Privileged materials may be identified on an appropriate privilege log if APD asserts privilege rather than producing them.

XXXVIII. DATA QUALITY AND SYSTEM LIMITATIONS

Produce records concerning known Flock system limitations, including:

- plate-read accuracy;
- state-identification errors;
- image-quality limitations;
- weather effects;
- duplicate reads;
- false hits;
- camera outages;
- connectivity problems;
- latency;
- incorrect timestamps;
- GPS/location errors;
- vehicle-description inaccuracies;
- historical-search limitations; and
- audit-log limitations.

Also produce vendor performance or technical reports supplied to APD.

XXXIX. SERVICE INTERRUPTIONS AND CAMERA DOWNTIME

Provide machine-readable or other available records of:

- camera downtime;
- device failures;
- outages;
- maintenance periods;
- communication failures;
- service interruptions;
- replacement periods; and
- decommissioned devices.

Include device ID, dates, duration, and reason.

XL. DATA LINKAGE CROSSWALK

To facilitate transaction-level testing, provide a crosswalk identifying how Flock records can be linked to APD systems, including:

- Flock query ID ↔ case number;
- Flock alert ID ↔ CAD event;
- CAD event ↔ incident report;
- incident report ↔ BWC event;
- arrest ↔ report;
- hot-list entry ↔ investigative case; and
- exported image ↔ evidence/RMS record.

If no formal crosswalk exists, identify the fields OIPA should use to perform these linkages.

XLI. SYSTEM-GENERATED REPORT INVENTORY

Provide a list of all administrative, audit, compliance, usage, sharing, access, performance, and activity reports Flock can generate for APD.

For each report, provide:

1. Report name;

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2. description;
3. available fields;
4. maximum historical period;
5. export format;
6. whether APD can generate it;
7. whether vendor assistance is required; and
8. whether it has been produced in response to this request.

XLII. RECORDS DELETED OR UNAVAILABLE

Identify categories of responsive records that:

- have already been deleted;
- expired under retention rules;
- cannot be restored;
- are vendor-controlled;
- are no longer accessible due to account deletion;
- existed only in a prior version of Flock; or
- cannot be exported.

For each category, provide:

1. Record type;
2. period affected;
3. reason unavailable;
4. applicable retention rule;
5. estimated number of records affected, if known;
6. whether backup copies exist; and
7. whether the vendor retains a recoverable copy.

XLIII. APD-CREATED DERIVED RECORDS

Produce databases, spreadsheets, intelligence products, dashboards, trackers, worksheets, or other APD-created records containing or derived from Flock data.

This includes records created outside the Flock system.

XLIV. SYSTEM INTEGRATIONS

Identify every APD or external system integrated with Flock during the audit period.

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For each integration, provide:

1. System name;
2. owner;
3. function;
4. information sent to Flock;
5. information received from Flock;
6. frequency;
7. retention;
8. access controls;
9. audit logging;
10. implementation date; and
11. termination date, if applicable.

XLV. API ACCESS

Identify whether APD, the City, Flock Safety, or any third party has API access to APD Flock information.

If so, provide:

- API user/account;
- purpose;
- permissions;
- data accessible;
- calls made;
- logging;
- credentials management;
- date activated;
- date deactivated; and
- receiving system/entity.

XLVI. RECORDS OF POLICY OR CONFIGURATION EXCEPTIONS

Produce records documenting any approved exception, waiver, override, temporary authorization, emergency access, or departure from normal Flock policies or configurations.

For each, identify:

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- requesting person;
- approving authority;
- reason;
- duration;
- affected data/users; and
- termination date.

XLVII. INTERNAL COMMUNICATIONS CONCERNING MISUSE OR RISK

Produce communications concerning identified or suspected:

- improper searches;
- inappropriate hot-list entries;
- overbroad use;
- external agency misuse;
- privacy concerns;
- civil-rights concerns;
- erroneous stops;
- data-sharing concerns;
- security concerns;
- retention concerns;
- employee misuse; or
- need for corrective policy changes.

XLVIII. AUDIT CONTACTS

Identify the APD personnel responsible for:

1. Flock program administration;
2. system administration;
3. user provisioning;
4. hot-list management;
5. camera deployment;
6. data sharing;
7. training;
8. legal review;
9. cybersecurity;
10. procurement;
11. contract management;

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12. internal auditing;
13. investigations;
14. patrol use;
15. intelligence use; and
16. records retention.

Include names, titles, assignments, and areas of responsibility.

XLIX. REQUIRED CERTIFICATION OF PRODUCTION

At the conclusion of production, OIPA requests a written certification from the appropriate APD custodian or program administrator stating:

1. That APD conducted a reasonable search for responsive records;
2. That the datasets produced represent the complete populations available to APD for the requested periods, except as specifically identified;
3. That no intentional filtering, sampling, or exclusion occurred unless disclosed;
4. That all date ranges are identified;
5. That all known gaps are identified;
6. That all known deleted/unavailable records are identified;
7. That all responsive datasets created by Flock Safety and available to APD were produced or specifically identified;
8. That all requested information APD cannot obtain from Flock Safety has been specifically identified;
9. That material transformations performed before production have been disclosed; and
10. That supplemental responsive records discovered after certification will be promptly provided to OIPA.

L. PRODUCTION INDEX

APD should provide a production index accompanying each production.

The index should identify:

Field	Description
Production Number	Unique production identifier
Request Section	Section of this request
Record/Dataset Name	Name of item
Source System	Flock, RMS, CAD, etc.
Date Range	Period covered

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Field	Description
Format	CSV, XLSX, PDF, etc.
Record Count	Number of rows/records
Custodian	Responsible APD component
Complete Population	Yes/No
Filtered	Yes/No
Filtering Description	If applicable
Known Gaps	Description
Data Dictionary Included	Yes/No
Notes	Additional information

LI. PREFERRED FILE-NAMING CONVENTION

To facilitate audit control, electronic files should, where practicable, use the following convention:

APD_FLOCK_*[RequestSection]/[DatasetName]/[StartDate]/[EndDate]/[ProductionDate]*

Example:

APD_FLOCK_X_SearchAuditLog_20260101_20261231_20270115.csv

LII. SUPPLEMENTAL REQUESTS

This request is intended to identify the principal records necessary to begin the audit.

OIPA may issue supplemental requests based upon:

- information identified during data analysis;
- missing fields;
- anomalies;
- audit exceptions;
- interviews;
- external-agency relationships;
- system capabilities not previously disclosed;
- changes in audit scope; or
- records necessary to independently verify selected transactions.

LIII. PRIORITY PRODUCTION SEQUENCE

To permit OIPA to begin data validation and sample design while other records are being assembled, APD should prioritize production in the following order:

Priority 1

- Complete Flock search/query audit log;
- Complete user/account population;
- Account and permission history;
- Camera/device inventory;
- Hot-list entry population;
- Alert population;
- data-sharing agency inventory;
- external-search logs;
- APD external-network access records; and
- data dictionaries.

Priority 2

- Policies;
- contracts;
- system configuration;
- retention;
- training;
- internal audits;
- complaint/disciplinary records;
- deployment documentation; and
- data-sharing agreements.

Priority 3

- CAD/enforcement linkage data;
- effectiveness records;
- program costs;
- public transparency records;
- legal reviews;
- system limitations;
- technical documentation; and
- supporting records necessary for transaction verification.

LIV. REQUIRED DISCLOSURE WHEN REQUESTED DATA CANNOT BE PRODUCED

For clarity, APD should not omit a requested item merely because:

- Flock does not make it visible in the standard user interface;
- APD has never previously requested the information;
- extraction requires vendor assistance;
- the data are difficult to export;
- the information exists only in a backend audit log;
- the data are retained for a limited period;
- a user account has been deleted; or
- APD does not ordinarily use the field.

If responsive information cannot be produced, APD must affirmatively identify that limitation in writing.

For each unavailable item, APD should state whether:

- A. The information never existed;**
- B. The information existed but was deleted;**
- C. The information exists but APD cannot access it;**
- D. The information exists and Flock Safety controls access;**
- E. The information exists but cannot be exported;**
- F. The information is maintained in another APD/City system; or**
- G. The status of the information is unknown.**

Where vendor assistance could resolve the issue, APD should contact Flock Safety and provide OIPA with the resulting response.

LV. FINAL PRODUCTION EXPECTATION

OIPA's audit requires the ability to independently reconstruct the operation of APD's Flock program.

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The production should therefore permit OIPA to determine, to the greatest extent supported by available records:

- Who had access;**
- what permissions they possessed;**
- what they searched;**
- when they searched;**
- what justification they entered;**
- what case or investigative activity supported the search;**
- what information the search returned;**
- whether information was downloaded or shared;**
- whether an alert was generated;**
- whether officers independently verified the information;**
- what enforcement action resulted;**
- who outside APD accessed APD data;**
- whose external data APD accessed;**
- how long records were retained;**
- whether APD audited the activity;**
- whether misuse or noncompliance was identified; and**
- what corrective action occurred.**

A production consisting only of policies, aggregate usage statistics, selected success stories, supervisory summaries, screenshots, or manually selected examples will not provide the underlying audit populations necessary to conduct an independent compliance audit.

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The purpose of this request is therefore to obtain the complete documentary, administrative, transactional, and electronic record necessary for OIPA to evaluate APD's Flock/ALPR program objectively, independently, and reproducibly.

Respectfully submitted,

Anthony Finnell

A handwritten signature in blue ink, appearing to read "A. Finnell", is positioned below the typed name.

Independent Police Auditor