

THORNTON POLICE DEPARTMENT MEMORANDUM



Date: April 1, 2026

To: City Council

From: Chad Parker
Division Commander

RE: Follow-up: Responses to Council Inquiries Regarding the Thornton Police Department's ALPR Program

Honorable Mayor, Mayor Pro Tem and City Council Members,

Following our discussion during the City Council Planning Session on February 3, 2026, I am providing this memorandum to address the specific questions and requests for additional information regarding the police department's use of automatic license plate reader technology.

The presentation from the February planning session is [linked here for easy reference](#).

Question 1: What percentage of Thornton searches included a case number?

In 2025, approximately 8% of total system searches included a specific case report or call for service number. It is important to note that many searches are conducted during proactive "real-time" patrol operations or initial lead-generation phases before a formal case number has been generated.

Following the February meeting, we have seen an increase in the inclusion of case report numbers or call for service numbers. This has been a result of internal messaging to users regarding the importance of this information.

Question 2: Are case numbers appropriately entered by existing policy?

Yes. The use of a case report or call for service number is optional because of the reasons further explained in Question 3 below.

Question 3: What are the pros and cons of requiring a case number for all searches?

Officers frequently review vehicles that trigger real-time alerts to determine whether the vehicle has appeared elsewhere in Thornton and whether that information could help locate a stolen vehicle or a vehicle connected to a crime.

Because of the real-time investigative uses, requiring a case number or call for service number to be entered for every search would not always be practical. Doing so would create a delay in the investigation and unnecessary administrative steps, such as generating a call for service solely to document the search. Even so, all searches are required by policy to be associated with an active law enforcement investigation or for training purposes.

Question 4: To how many agencies has the department revoked access, and what criteria are used to evaluate outside agencies to determine reasons for revocations?

To date, the department has revoked over 2,100 agencies. Our primary goal is to ensure that every search of Thornton data aligns with both state law and department policy. Outside agency searches are regularly audited to evaluate the reason for the search. If the justification does not clearly adhere to legal or department standards, access is immediately revoked.

When a search does not clearly meet legal or policy standards, access may be revoked. Following recent software updates by Flock that made "Reason for Search" a mandatory field, our audits identified a number of agencies selecting the "Other" option without providing a sufficient explanation. Because these searches could not be validated against legal or policy requirements, those agencies' access was revoked.

Question 5: Previously released public records indicate searches were conducted for "Homeland Security." How many such searches occurred, and is there detail regarding their appropriateness?

The data referenced stems from the December 2025 National Audit, which captured a total of 1,048,576 system searches conducted by other agencies that touched our network. Approximately 131 searches identified "HSI" (Homeland Security Investigations) as the reason. Of these only 2 returned results from our system. An additional 125 searches citing "FED" or "Federal" of which on 1 returned a result from our system.

Upon further review, approximately 58 of these searches provided detailed justifications tied to specific criminal investigation including "Criminal Motor Vehicle Offense", "Drugs/Narcotics" and "Elder Fraud Victim". Access was revoked for agencies with reasons that could not be validated against legal and policy requirements.

Question 6: Why were "Convoy" searches not included in search data from presentation?

The data provided during the February 3rd presentation was a focused snapshot of system activity from December 2025. During that specific one-month period, no "Convoy" searches were conducted, which is why that category did not appear in the sample set. To provide the Council with a more comprehensive view of system usage, the Department has expanded the reporting parameters to encompass the full 2025 calendar year.

2025 Search Activity

Search Type	Count
Convoy	27
Lookup	18,425
MultiGeo	1
Search	27,570
Visual	207
Grand Total	46,230

Question 7: How many searches does Westminster conduct through the Flock system and how does it compare to Thornton?

The Westminster Police Department advised they are currently in the process of reviewing the use of Automatic License Plate Readers in their jurisdiction as well. They were not currently willing to share their search numbers with us, but advised that they currently use three different ALPR systems.

To compare our use of the Flock system to those of other regional law enforcement agencies, we reached out to several other metro area law enforcement agencies to see if any were using the system differently than the Thornton Police Department. We received responses from ten different agencies.

From those responses we found that none of the agencies placed any specific limitations on the use of the system beyond the need for searches to be tied to official police business with specific crimes being identified.

Only three of the ten agencies require a case number or call for service number.

Sharing protocols varied with seven agencies sharing nationally, two restricting sharing to the State of Colorado, and one limiting access to internal use only.

Comparison of number of ALPR cameras by jurisdiction

Agency	# of LPR Cameras	Population
Arvada	20	122,000
Aurora	110	400,000
Boulder PD	30	106,000
Brighton	9	45,062
Broomfield	2	80,237
Colorado Springs	57	494,219
Commerce City	32	70,000

Denver	116	716,000
Ft. Collins	20	171,000
Greeley	22	116,900
Lakewood	34	156,000
Northglenn	10	38,410
Pueblo	8	110,794
Thornton	15	147,000
Westminster	7	115,000

Question 8: What are the CJIS requirements for ALPR systems?

ALPR data is largely considered Criminal Justice Information (CJI) because it is frequently derived from or compared against restricted files (like the NCIC "Hot List"). ALPR data has the same security requirements as does any Criminal Justice Information.

Question 9: If Agencies do not have MFA, how do they comply, and is there an intention to make MFA a requirement?

City Information Technology's Cybersecurity Team is currently evaluating the Flock system using the National Institute of Standards and Technology (NIST) Cybersecurity Framework (CSF). The purpose of this review is to assess concerns raised through public comments and emails from Thornton residents. The evaluation is ongoing, and a portion of the review has been completed. This evaluation will include an evaluation of all Flock system security features to include MFA requirements.