



August 31, 2026

SENT VIA EMAIL

W. [REDACTED]
[REDACTED]

Re: Public Records Act Request - Bishop Police Department

Dear Mr. [REDACTED]

This office represents the City of Bishop Police Department ("BPD") it is in that capacity I write. Your Public Records Act ("PRA") request dated August 26, 2026 has been forwarded to our office for review and response.

Be advised Bishop Police Department cancelled the contract it had with Flock. The cancellation means it no longer has access to any of the data you request. Request numbers 5, 8 and 9 seek records that are disclosable public record. A search for responsive records to these three requests are being conducted now and it is estimated that search will take approximately 30 days to complete. Disclosable records will then be sent to you. Chief Nate Derr made the determinations in this response.

Very truly yours,

Gregory P. Palmer
Counsel for City of Bishop Police Department

GPP/sm
cc: Chief Nate Derr - Bishop Police Department

Northern California
6349 Auburn Blvd.
Citrus Heights, CA 95621
(916) 771-0635

Southern California
3777 N. Harbor Blvd.
Fullerton, CA 92835
(714) 446-1400

[External] FW: Request for Quarterly Confirmation – Flock Data Retention

From Daniel Casabian <dcasabian@townofmammothlakes.ca.gov>

Date Tue 6/16/2026 12:26 PM

To Nate Derr <nderr@bishoppd.org>

Dan Casabian
Chief

From: Chris Colwell <chris.colwell@flocksafety.com>

Sent: Wednesday, May 20, 2026 11:04 AM

To: Daniel Casabian <dcasabian@townofmammothlakes.ca.gov>

Cc: Rob Patterson <rpatterson@townofmammothlakes.ca.gov>; Andrew Morris
<amorris@townofmammothlakes.ca.gov>

Subject: Re: Request for Quarterly Confirmation – Flock Data Retention

[EXTERNAL EMAIL]

Chief Casabian,

Thanks for the note. There is no action needed on your end regarding the reporting; my team will set that up to be sent out quarterly once the cameras are reactivated.

What are the next steps for you and the community to get the system back online? Please let me know if there is anything we can do to help move the ball forward on that process.

Best regards,
Chris

On Wed, May 20, 2026 at 10:38 AM Daniel Casabian
<dcasabian@townofmammothlakes.ca.gov> wrote:

Chris,

Thank you for the detailed explanation and for taking the time to walk through how the process works on the backend. That context is very helpful, and I appreciate the transparency.

The quarterly confirmation process you outlined sounds great and should fully meet our needs moving forward. Having the confirmation that the 30-day deletion policy remained active and operated as intended, along with the capture and deletion totals, will be very helpful for our records and for addressing any future questions that may come up from Council or the community.

I also want to thank you for your responsiveness and partnership throughout this process. Your help has gone a long way in getting everyone comfortable and helping us move toward getting the system back online.

Please feel free to proceed with the reporting format you described. Let me know if there is anything we need to do to get this set up on a quarterly basis.

Thanks again, Chris.

Dan Casabian
Chief

From: Chris Colwell <chris.colwell@flocksafety.com>
Sent: Tuesday, May 19, 2026 14:34
To: Daniel Casabian <dcasabian@townofmammothlakes.ca.gov>
Cc: Rob Patterson <rpatterson@townofmammothlakes.ca.gov>; Andrew Morris <amorris@townofmammothlakes.ca.gov>
Subject: Re: Request for Quarterly Confirmation – Flock Data Retention

[EXTERNAL EMAIL]

Chief Casabian,

Thanks for the kind note, and glad yesterday's information was useful in addressing Council Member Bubser's concerns. Great news that the system is on track to be turned back on. On your request for periodic verification: yes, we can support that. Quick context on how this works under the hood so the format makes sense:

- The 30-day deletion is enforced through AWS's standard S3 lifecycle policy, not a Flock-built process. Deletion runs automatically and continuously in AWS, with AWS-generated logs as the system of record.
- Our team already checks those logs internally as part of routine operations.

If it suffices, here is what we will commit to going forward: a quarterly confirmation email to you, sourced directly from the logs, that includes:

- Confirmation that the 30-day automated deletion process remained in effect and operated as designed during the quarter.
 - The number of images captured on Mammoth Lakes' tenant during the period.
 - The number of images deleted during the period in accordance with the retention policy.
- Please let me know if you have any further questions.

Thanks again,
Chris

On Tue, May 19, 2026 at 12:16 PM Daniel Casabian <dcasabian@townofmammothlakes.ca.gov> wrote:

Chris,

Thank you again for your quick response yesterday and for providing the detailed information regarding the AWS lifecycle rules, CloudTrail logging, and the CJIS/FedRAMP compliance standards associated with the Flock system. The information was extremely helpful and satisfied

the concerns that were recently raised by Council Member Bubser regarding data retention and deletion practices. With this information, we are now in the process with Flock to get the system turned back on after about a 4-6 month suspension.

When the Town initially approved implementation of the Flock system approximately two years ago, Council Member Bubser expressed concerns regarding how AWS permanently deletes stored data after the 30-day retention period. As part of those discussions, there was also a request for periodic confirmation that the system continued operating as described and that the automated deletion process remained in compliance with the agreed-upon retention standards.

Based on those concerns and discussions at the time, language requiring reviews or confirmations related to the deletion process was incorporated into our contract terms. However, since implementation we have not received any formal correspondence or documentation from Flock confirming the continued operation of the automated deletion process as outlined in the agreement. Given the renewed discussion surrounding the program and the recent questions from Council, I wanted to follow up and see whether your team would be able to provide a quarterly verification, report, or confirmation indicating that the Flock system data deletion process is functioning as intended and consistent with the contractual retention requirements.

I believe having this information available moving forward would help maintain transparency with Council and continue addressing any concerns related to data privacy and retention compliance. Please let me know what options may be available or if there is an established process for agencies requesting this type of periodic verification.

Thanks again for the quick assist yesterday!

Cc'd:

Rob Patterson, Town Manager

Andy Morris, Town Attorney

Daniel Casabian

Chief

Mammoth Lakes Police Department

58 Thompsons Way | P.O. Box 2799

Mammoth Lakes, CA 93546

o [REDACTED] | c [REDACTED]

Non-Emergency Dispatch | [REDACTED] ext 7



Disclaimer: Public documents and records are available to the public as provided under the California Public Records Act (Government Code Sections 7920.000-7931.000). This e-mail may be considered subject to the Public Records Act and may be disclosed to a third-party requester.

[External] FW: Flock Data Deletion — How It Works and How It's Verified

From Daniel Casabian <dcasabian@townofmammothlakes.ca.gov>

Date Tue 6/16/2026 12:26 PM

To Nate Derr <nderr@bishoppd.org>

 1 attachment (323 KB)

Flock Safety - Data deletion on AWS.pdf;

Dan Casabian
Chief

From: Chris Colwell <chris.colwell@flocksafety.com>

Sent: Monday, May 18, 2026 5:23 PM

To: Daniel Casabian <dcasabian@townofmammothlakes.ca.gov>

Cc: Rob Patterson <rpatterson@townofmammothlakes.ca.gov>

Subject: Flock Data Deletion — How It Works and How It's Verified

[EXTERNAL EMAIL]

Chief Cadabian,

Following up on the question raised about proof of data deletion. Below is a direct, plain-language answer you can use when you take this back to Council. I've also attached a short technical brief that walks through the underlying mechanics if anyone wants the deeper detail.

The short answer:

Mammoth Lakes' LPR data is stored in Amazon Web Services (AWS) and is automatically and permanently deleted after 30 days (Our standard retention period is 30 days, unless a different period is required by customer policy, contract, or law). The deletion is enforced by an automated AWS lifecycle rule that AWS itself executes — there is no manual step that can be skipped or overridden.

Every deletion is logged in AWS CloudTrail with a tamper-proof, cryptographically validated timestamp, and AWS CloudWatch shows the corresponding drop in stored data in real time. Once data expires, it cannot be recovered by anyone — including AWS engineers — by design. These controls are independently audited annually under SOC 2, ISO 27001, FedRAMP, and CJIS (AWS is the only cloud provider that is CJIS-compliant in all 50 states).

Please let me know if I can be of further assistance or if you would like anyone from the Flock team to jump on a meeting or call.

Best,
Chris

Chris Colwell

SVP, Customer Experience



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[ter](#)

flocksafety.com



Em

ail

chris.colwell@flocksafety.com



[Flock Safety](#)

Automated License Plate Readers (ALPRs)

429.1 PURPOSE AND SCOPE

The purpose of this policy is to provide guidance for the capture, storage and use of digital data obtained through the use of Automated License Plate Reader (ALPR) technology.

429.2 POLICY

The policy of the Bishop Police Department is to utilize ALPR technology to capture and store digital license plate data and images while recognizing the established privacy rights of the public.

All data and images gathered by the ALPR are for the official use of this department. Because such data may contain confidential information, it is not open to public review.

429.3 ADMINISTRATION

The ALPR technology, also known as License Plate Recognition (LPR), allows for the automated detection of license plates. It is used by the Bishop Police Department to convert data associated with vehicle license plates for official law enforcement purposes, including identifying stolen or wanted vehicles, stolen license plates and missing persons. It may also be used to gather information related to active warrants, homeland security, electronic surveillance, suspect interdiction and stolen property recovery.

All installation and maintenance of ALPR equipment, as well as ALPR data retention and access, shall be managed by the Administration Operation Commander. The Administration Operation Commander will assign members under his/her command to administer the day-to-day operation of the ALPR equipment and data.

429.3.1 ALPR ADMINISTRATOR

The Administration Operation Commander shall be responsible for developing guidelines and procedures to comply with the requirements of Civil Code § 1798.90.5 et seq. This includes, but is not limited to (Civil Code § 1798.90.51; Civil Code § 1798.90.53):

- (a) A description of the job title or other designation of the members and independent contractors who are authorized to use or access the ALPR system or to collect ALPR information.
- (b) Training requirements for authorized users.
- (c) A description of how the ALPR system will be monitored to ensure the security of the information and compliance with applicable privacy laws.
- (d) Procedures for system operators to maintain records of access in compliance with Civil Code § 1798.90.52.
- (e) The title and name of the current designee in overseeing the ALPR operation.
- (f) Working with the Custodian of Records on the retention and destruction of ALPR data.

Bishop Police Department

Bishop PD Policy Manual

Automated License Plate Readers (ALPRs)

- (g) Ensuring this policy and related procedures are conspicuously posted on the department's website.

429.4 OPERATIONS

Use of an ALPR is restricted to the purposes outlined below. Department members shall not use, or allow others to use the equipment or database records for any unauthorized purpose (Civil Code § 1798.90.51; Civil Code § 1798.90.53).

- (a) An ALPR shall only be used for official law enforcement business.
- (b) An ALPR may be used in conjunction with any routine patrol operation or criminal investigation. Reasonable suspicion or probable cause is not required before using an ALPR.
- (c) While an ALPR may be used to canvass license plates around any crime scene, particular consideration should be given to using ALPR-equipped cars to canvass areas around homicides, shootings and other major incidents. Partial license plates reported during major crimes should be entered into the ALPR system in an attempt to identify suspect vehicles.
- (d) No member of this department shall operate ALPR equipment or access ALPR data without first completing department-approved training.
- (e) No ALPR operator may access department, state or federal data unless otherwise authorized to do so.
- (f) If practicable, the officer should verify an ALPR response through the California Law Enforcement Telecommunications System (CLETS) before taking enforcement action that is based solely on an ALPR alert.

429.5 DATA COLLECTION AND RETENTION

The Patrol Operation Commander is responsible for ensuring systems and processes are in place for the proper collection and retention of ALPR data. Data will be transferred from vehicles to the designated storage in accordance with department procedures.

All ALPR data downloaded to the server should be stored for a minimum of one year and in accordance with the established records retention schedule. Thereafter, ALPR data should be purged unless it has become, or it is reasonable to believe it will become, evidence in a criminal or civil action or is subject to a discovery request or other lawful action to produce records. In those circumstances the applicable data should be downloaded from the server onto portable media and booked into evidence.

429.6 ACCOUNTABILITY

All data will be closely safeguarded and protected by both procedural and technological means. The Bishop Police Department will observe the following safeguards regarding access to and use of stored data (Civil Code § 1798.90.51; Civil Code § 1798.90.53):

Automated License Plate Readers (ALPRs)

- (a) All ALPR data downloaded to the mobile workstation and in storage shall be accessible only through a login/password-protected system capable of documenting all access of information by name, date and time (Civil Code § 1798.90.52).
- (b) Members approved to access ALPR data under these guidelines are permitted to access the data for legitimate law enforcement purposes only, such as when the data relate to a specific criminal investigation or department-related civil or administrative action.
- (c) ALPR system audits should be conducted on a regular basis.

For security or data breaches, see the Records Release and Maintenance Policy.

429.7 RELEASING ALPR DATA

The ALPR data may be shared only with public agencies and only as otherwise permitted by law (Civil Code § 1798.90.55).

For purposes of this section, a public agency is limited to California state or local agencies, including law enforcement agencies, and does not include out-of-state or federal law enforcement agencies (Civil Code § 1798.90.5).

The following procedures are guidelines for ALPR requests:

- (a) The agency makes a written request for the ALPR data that includes:
 - 1. The name of the agency.
 - 2. The name of the person requesting.
 - 3. The intended purpose of obtaining the information.
- (b) The request is reviewed by the Administration Operation Commander or the authorized designee and approved before the request is fulfilled.
- (c) The approved request is retained on file.

Requests for ALPR data by non-California public agencies will be processed as provided in the Records Maintenance and Release Policy (Civil Code § 1798.90.55).

429.8 TRAINING

The Training Coordinator should ensure that members receive department-approved training for those authorized to use or access the ALPR system (Civil Code § 1798.90.51; Civil Code § 1798.90.53).

