

ARKANSAS ACCOUNTABILITY PROJECT REQUEST FOR LEGISLATIVE REVIEW

Arkansas Code Annotated §§ 12-12-1801 Through 12-12-1808

Automatic License Plate Reader System Act

Evidence-Based Request for Interim Study

July 22, 2026

Prepared for the Members of the Arkansas General Assembly

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PUBLIC REFERENCE EDITION

This edition is prepared for public distribution. Identifiable vehicle images, visible license plates, exact geographic coordinates, and spreadsheet fields capable of identifying a particular vehicle have been omitted. The unredacted evidentiary materials remain preserved in ARAP's restricted evidence repository and may be made available to authorized legislative or legal reviewers.

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REQUEST FOR LEGISLATIVE REVIEW

Arkansas Code Annotated §§ 12-12-1801 Through 12-12-1808

Automatic License Plate Reader System Act - Evidence-Based Request for Interim Study

July 22, 2026

To the Members of the Arkansas General Assembly

Arkansas State Capitol

Little Rock, Arkansas 72201

Re: Request for Legislative Review of Arkansas Code Annotated §§ 12-12-1801 Through 12-12-1808

Dear Members of the Arkansas General Assembly:

The Arkansas Accountability Project respectfully requests a comprehensive legislative review of Arkansas Code Annotated §§ 12-12-1801 through 12-12-1808, governing the use, retention, sharing, and disclosure of automatic license plate reader data in Arkansas.

This request is not intended to allege misconduct by any particular law-enforcement agency, public official, employee, or technology provider. It is based on public records obtained from multiple Arkansas jurisdictions that raise legitimate questions about whether the present statutory framework adequately addresses the scale, capabilities, administration, disclosure, and interstate connectivity of modern automatic license plate reader systems.

The current law was enacted when these systems were commonly understood as tools for comparing license plates against specified law-enforcement databases. Modern systems may now include large camera networks, historical vehicle-location searches, detailed vehicle-description filters, multistate sharing arrangements, automated alerts, cloud storage, and analytical tools capable of identifying movement patterns across time and jurisdictional boundaries.

Our review suggests that the General Assembly should determine whether the law remains sufficiently clear, consistent, and enforceable.

Areas Supporting Legislative Review

1. Collection occurs on a very large scale

Records reviewed during this project show that individual jurisdictions may collect millions of vehicle images within a matter of months.

In one reporting period examined, more than seven million images were recorded while only a small number were reported as leading to arrest and prosecution. That does not establish that the technology lacks legitimate public-safety value. It does demonstrate that the volume of records

involving ordinary motorists may greatly exceed the number associated with alerts, investigations, arrests, or prosecutions.

The General Assembly should consider whether existing reporting requirements provide enough information to evaluate necessity, effectiveness, proportionality, cost, and error rates.

2. Reporting practices appear inconsistent among jurisdictions

Agencies do not appear to use uniform definitions or methods for reporting the following categories:

- Plates scanned;
- Alerts generated;
- Confirmed and unconfirmed matches;
- Historical searches;
- Search reasons;
- Stops, arrests, charges, prosecutions, and recoveries;
- False alerts;
- Records retained beyond the ordinary retention period; and
- Access by outside agencies.

Without standardized definitions, lawmakers, local officials, and the public cannot easily compare results among agencies or determine whether statutory duties are being interpreted consistently.

3. “Ongoing investigation” requires clarification

The current statutes permit certain uses and extended retention in connection with an ongoing investigation, but they do not clearly answer several practical questions:

- Must the investigation already exist when the data is collected or preserved?
- May records be retained because they might become useful in a future investigation?
- What documentation is required?
- Must a case, incident, warrant, or investigative file number be associated with the retained data?
- Who authorizes extended retention?
- How often must continued retention be reviewed?
- What record confirms destruction at the end of the investigation or related criminal proceeding?

Clearer definitions and documentation requirements would protect both law enforcement and the public.

4. Historical and analytical searches may extend beyond simple database comparison

Modern systems may allow users to search historical records by full or partial plate number, vehicle make, color, body type, visible identifiers, direction of travel, date range, location, and combinations of descriptive filters.

The General Assembly should determine whether these retrospective and analytical searches were contemplated by the current statute and, if permitted, what standards should apply. Potential safeguards include:

- A documented law-enforcement purpose;
- A case or incident reference;
- A sufficiently specific written justification;
- Limits on time and geographic scope;
- Supervisory approval for broad searches;
- Periodic audits; and
- Consequences for unsupported or misleading search reasons.

5. Traffic-related use remains unclear

Records reviewed during this project include searches or usage categories associated with traffic-related matters.

The current law contains language that may be interpreted broadly, including references to lawful law-enforcement purposes. The General Assembly should clarify whether automatic license plate reader systems may be used for routine traffic enforcement, minor offenses, civil matters, or searches unrelated to a documented criminal investigation.

6. Extensive sharing networks raise interstate and accountability questions

Publicly available information and records obtained from Arkansas agencies indicate that locally collected data may be accessible through broad interagency networks, including access by agencies outside Arkansas.

The statute should more clearly address:

- Whether continuing network access constitutes sharing;
- Whether data must indicate evidence of a specific offense before another agency accesses it;
- Whether the originating agency must approve each request;
- Whether out-of-state agencies must follow Arkansas use and retention restrictions;
- Whether the originating agency must maintain a complete access log;
- Whether data may be accessed for traffic, civil, or administrative purposes;
- Whether default nationwide or vendor-managed sharing is permitted; and
- What remedies apply when Arkansas-generated data is used for a purpose that would not be authorized in Arkansas.

7. Written policies may be adopted after deployment

Records reviewed during this project indicate that at least one Arkansas jurisdiction operated an automatic license plate reader system before adopting its current written policy.

The General Assembly should consider requiring every governmental entity to adopt, publish, and obtain governing-body approval of a comprehensive policy before deployment, renewal, expansion, or connection to an outside sharing network.

8. Vendor settings and changing online terms may determine public-policy outcomes

The actual operation of an automatic license plate reader system may depend on vendor-controlled settings, default sharing options, account permissions, retention configurations, analytical features, software updates, and online contractual terms.

The law should clarify that governmental entities remain responsible for compliance even when information is stored, searched, processed, or shared through a private contractor.

Agencies should also be required to preserve the exact version of all contracts, terms of service, data-use provisions, and system settings in effect during each contract period.

9. Public outcome reporting may stop before final disposition

Some reports count alerts, hits, stops, arrests, or matters referred for prosecution without showing whether:

- The alert was accurate;
- The vehicle was stopped;
- The driver was the registered owner;
- Evidence was recovered;
- Charges were filed;
- Charges were dismissed;
- A conviction resulted; or
- The alert was unrelated to the final disposition.

A standardized outcome-reporting model would allow a more accurate evaluation of benefits, costs, accuracy, and unintended consequences.

10. The current law does not appear to create a complete administrative oversight process

The statutes provide remedies, but they do not clearly establish a central state entity responsible for routine compliance audits, standardized reporting, complaint review, public disclosure oversight, or statewide technical standards.

An affected person may never know that a vehicle record was searched, retained, shared, or released. A remedy dependent on discovering the event may therefore be difficult to use.

Documented Sherwood Example: Release of Detailed Records for an Unrelated Vehicle

A response from the Sherwood Police Department provides a concrete example of why the disclosure provisions of §§ 12-12-1801 through 12-12-1808 should be reviewed.

On June 30, 2026, a requester submitted Arkansas Freedom of Information Act Request CITY-2026-112, seeking all automatic license plate reader images, timestamps, and location data associated with a specifically identified Arkansas vehicle for the period June 1 through July 1, 2026.

The request identified the vehicle by license plate, state, color, and vehicle type. It did not state that the requester was the vehicle's registered owner, had the owner's consent, or possessed any other legal interest in the vehicle. The vehicle had been selected without any known personal relationship between the requester and the owner. The Sherwood records portal subsequently marked the request completed and displayed 85 responsive files available for download.

The released material included a spreadsheet containing 80 tabular detection records associated with the same plate. The records covered observations between June 1 and June 28, 2026, and included detections on multiple dates at numerous Sherwood camera locations.

The spreadsheet included:

- The license plate number and state;
- Capture date and precise time;
- Vehicle make, body type, color, and visible identifiers;
- Capture network;
- Camera name and direction;
- Geographic coordinates; and
- Corresponding image filenames.

The production also included numerous clear photographs of the same vehicle and its visible license plate. The images documented repeated observations at locations including Brockington Road, Kellogg Acres Road, Highway 107, Warden Road, West Maryland Avenue, Landers Road, Wildwood Avenue, and Jacksonville Cutoff Road.

The follow-up correspondence described the production as approximately 85 detections and stated that the released records included capture dates, times, vehicle descriptors, camera locations, GPS coordinates, and corresponding images documenting the vehicle's movements within the city.

This was not the release of a single incidental photograph. It was a structured collection capable of showing where a particular vehicle was observed, on what date, at what precise time, in which direction it was traveling, and at which camera location.

The issue is not whether the requester committed wrongdoing. The request was submitted openly, and the requester did not claim ownership, consent, or another legal interest in the vehicle.

The policy question is whether Arkansas law permits a public agency to release a detailed set of identifiable vehicle-location records to a person who has not demonstrated ownership, authorization, or another statutory basis for receiving them.

Request for clarification sent to Sherwood officials

After receiving the records, the requester sent a written request for clarification and preservation of records to the Sherwood Police Department, with copies directed to the Mayor, City Attorney, and members of the City Council.

The letter asked:

1. What statutory authority or legal interpretation supported the release;
2. Whether the Department verified that the requester was the registered owner or otherwise legally entitled to the records;
3. What verification procedures were used;
4. Whether the Department considered its procedures consistent with § 12-12-1808;
5. Whether the Department would review its policies or training;
6. Whether the registered owner was notified; and
7. What office or position authorized the release.

The letter also requested preservation of internal communications, legal review, routing records, approval documentation, and communications with the City Attorney relating to the decision.

The email record shows that the letter was sent on July 14, 2026, to the Police Department's public-information address and copied to the listed municipal officials. One council-member address produced a delivery failure. The record does not show comparable delivery failures for the other listed recipients.

As of July 22, 2026, no substantive response addressing the requested legal authority, verification procedures, authorization, owner notification, or corrective review has been received from the Police Department, Mayor, City Attorney, or any successfully reached member of the City Council.

That absence of a substantive response is not presented as proof of intentional misconduct or as a final legal conclusion that the disclosure violated Arkansas law.

It does, however, demonstrate that the current framework does not clearly identify:

- Who must review a disputed ALPR disclosure;
- Whether a written determination is required;
- Whether the affected vehicle owner must be notified;
- Whether the incident must be reported to an outside authority;
- Whether related records must be preserved;
- Whether corrective action or retraining is required; and
- What administrative remedy exists when local officials do not provide a substantive response.

This example shows that ALPR regulation concerns not only collection and investigative use, but also the protection, disclosure, and accountability of the records after they are collected.

Requested Legislative Actions

8. Refer §§ 12-12-1801 through 12-12-1808 to the appropriate interim committees for comprehensive review.
9. Request testimony from municipal police departments, county sheriffs, the Arkansas State Police, prosecutors, defense attorneys, municipal officials, privacy and civil-liberties organizations, technology providers, records custodians, and members of the public.

10. Direct the Bureau of Legislative Research or another appropriate entity to survey every Arkansas governmental agency that owns, operates, or accesses an automatic license plate reader system.
11. Require the survey to identify the number and location of cameras; system provider; contract costs and funding sources; retention periods; search procedures; sharing configurations; outside agencies with access; numbers of scans, alerts, searches, stops, arrests, charges, recoveries, prosecutions, and false alerts; records retained beyond the normal period; legal authority relied upon for historical searches; and the date the agency adopted its governing policy.
12. Establish uniform definitions for scans, alerts, confirmed matches, searches, investigative uses, arrests, prosecutions, recoveries, false alerts, extended retention, outside access, and disclosure.
13. Clarify the meaning of “ongoing investigation,” “evidence of an offense,” “lawful purpose,” “used or shared,” “captured plate data,” and “disclosure.”
14. Determine whether continuous network access is legally equivalent to sharing.
15. Establish clear rules for interstate access to Arkansas-generated data.
16. Require a documented case-related purpose for historical searches and extended retention.
17. Require supervisory review, complete audit logs, periodic compliance audits, and meaningful consequences for unauthorized searches or unsupported justifications.
18. Require a public policy and governing-body approval before deployment, renewal, material expansion, or activation of new analytical or sharing capabilities.
19. Require agencies to document and disclose significant system errors and false alerts, particularly when incorrect data contributes to a detention, high-risk stop, search, arrest, or other significant police action.
20. Reevaluate whether the current retention period remains appropriate given the scale and searchability of modern databases.
21. Establish minimum cybersecurity, breach-notification, data-location, deletion-verification, subcontractor, and account-security requirements.
22. Create a statewide registry identifying every governmental entity that owns, operates, or accesses an automatic license plate reader system.
23. Establish uniform rules governing public disclosure of captured plate data, including identification of the statutory authority supporting disclosure; requester-verification standards; supervisory or legal review; disclosure logs; preservation of decision records; notice to affected vehicle owners when appropriate; mandatory reporting of mistaken or unauthorized releases; and an independent complaint and review process.
24. Determine whether identifiable historical vehicle-location records should be released through the ordinary public-records process when the requester has not demonstrated ownership, consent, or another lawful entitlement.

A Request for Clarification, Not Predetermined Conclusions

Automatic license plate reader systems may assist in locating stolen vehicles, identifying wanted persons, investigating serious crimes, and responding to child-abduction or missing-person cases. Those potential benefits deserve fair consideration.

At the same time, the collection of millions of time-stamped and location-associated vehicle images is fundamentally different in scale from an officer observing or photographing one vehicle during one investigation.

The policy question is not simply whether a license plate is visible in public. It is whether Arkansas law provides clear and enforceable rules for the mass collection, retention, analysis, sharing, and public disclosure of vehicle-location information.

Our project has attempted to approach this issue neutrally, give agencies the benefit of the doubt, distinguish confirmed facts from unresolved questions, and avoid conclusions unsupported by documentary evidence.

We are not asking the General Assembly to prohibit useful law-enforcement technology. We are asking it to determine whether statutes enacted for an earlier generation of automatic license plate reader systems continue to provide adequate safeguards for technology operating at its present scale and capability.

We respectfully request that this matter be placed on an interim-study agenda and that the General Assembly begin a transparent, evidence-based review before additional systems, integrations, and data-sharing relationships are established across Arkansas.

We are prepared to provide the records, audit reports, policies, contracts, correspondence, public reporting data, images, spreadsheets, and comparative materials collected during this project for legislative consideration.

Thank you for your service to the State of Arkansas and for your consideration of this request.

Respectfully submitted,

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Proposed Supporting Attachments

- Attachment A - Executive Summary of Arkansas ALPR Records Reviewed
- Attachment B - Jurisdiction-by-Jurisdiction Findings Matrix
- Attachment C - Statutory Questions Under §§ 12-12-1801 Through 12-12-1808
- Attachment D - Sherwood Request CITY-2026-112 and Responsive-Records Summary
- Attachment E - Public Reference Summary of Sherwood ALPR Records
- Attachment F - July 14, 2026 Clarification and Preservation Correspondence
- Attachment G - Usage, Search, Retention, and Sharing Records from Other Arkansas Jurisdictions
- Attachment H - Source and Evidence Index

Source Notes for the Sherwood Example

1. Sherwood Police Department public-records portal, Request CITY-2026-112, showing the request submitted June 30, 2026, completed status, and 85 responsive files.
2. Flock Safety Search Results CSV produced with Request CITY-2026-112, containing 80 tabular detection records and fields for plate, state, capture date and time, vehicle description, capture network, camera, location coordinates, and image filename.
3. Representative ALPR image files produced with Request CITY-2026-112, showing the same vehicle at multiple Sherwood camera locations and times.
4. Request for Clarification and Preservation of Records dated July 14, 2026, addressed to the Sherwood Police Department and copied to the Mayor, City Attorney, and City Council.
5. Email transmission record dated July 14, 2026, showing delivery to the Police Department public-information address and listed municipal recipients, with one council-member address returning a delivery failure.

ATTACHMENT A

Executive Summary of Arkansas ALPR Records Reviewed

Supporting the Request for Legislative Review of Ark. Code Ann. §§ 12-12-1801 Through 12-12-1808

Prepared by the Arkansas Accountability Project - ARAP

Date: July 22, 2026

Editorial Standard

This summary distinguishes documented facts from questions and recommendations. An incomplete or unavailable record is not treated as proof of misconduct, and disputed legal interpretations are presented for legislative and legal review rather than resolved by ARAP.

Purpose

This attachment summarizes selected records obtained from Arkansas law-enforcement agencies concerning the acquisition, operation, retention, searching, sharing, auditing, reporting, and disclosure of automatic license plate reader data.

The records reviewed do not establish that every agency follows the same practices, and they do not support a conclusion that any particular agency has intentionally violated Arkansas law. They do show that modern ALPR systems operate at a scale and level of technical complexity that raise questions not clearly resolved by the present statutory language.

The principal legislative question is whether Ark. Code Ann. §§ 12-12-1801 through 12-12-1808 continue to provide sufficiently clear and uniform rules for:

- Authorized uses and historical searches;
- Retention for an “ongoing investigation”;
- Interagency and interstate data access;
- Public disclosure of identifiable vehicle-location data;
- Administrative auditing and oversight;
- Vendor-controlled records and system settings; and
- Standardized public reporting.

Records Reviewed

ARAP has reviewed records involving multiple Arkansas jurisdictions, including Sherwood, Cabot, Jacksonville, and Pulaski County. The record categories include:

- Agency policies and procedures;
- Practice-and-usage reports;
- Search and audit records;
- Network-access and sharing information;
- Vendor agreements and procurement records;
- Public-records correspondence;
- Camera-location and detection data;
- ALPR images and spreadsheet exports; and
- Records describing administrative oversight and record custody.

The records are not identical in format or completeness. Some agencies produced native spreadsheets or audit exports, while others reported that certain records were maintained by a vendor, were unavailable to the local end user, or were not maintained as a separate administrative record.

Source note: Detailed exhibit citations for Cabot, Jacksonville, and Pulaski County should be inserted from the ARAP evidence repository before final legislative distribution.

Principal Findings

1. ALPR collection occurs on a substantial scale

A Cabot Police Department semiannual report states that 7,365,404 license plates were scanned during a six-month reporting period. The report recorded 1,022 positive alerts, 763 matches that did not correlate to the alert, and 13 matches reported as resulting in an arrest and prosecution.

These numbers should not, standing alone, be interpreted as proving that the system is effective or ineffective. They do demonstrate that ALPR programs can collect millions of records involving ordinary motorists while producing a much smaller number of reported enforcement outcomes.

The current statutory reporting framework does not clearly require agencies to distinguish consistently among:

- Initial alerts;
- Confirmed matches;
- False or unconfirmed alerts;
- Stops;
- Arrests;
- Charges;
- Prosecutions;
- Dismissals;
- Convictions; and
- Property or missing-person recoveries.

Uniform definitions would permit more meaningful statewide comparison.

Source citation pending insertion from the Cabot evidence file in the ARAP repository.

2. Policies use broad language that may permit differing interpretations

The Pulaski County Sheriff's Office policy states that license plate readers may be used to detect violations of law, recover stolen property, locate missing persons, apprehend fugitives, assist investigations, and perform "other tasks" under the policy. Its definition of a hot list includes vehicles or plates associated with criminal activity and information maintained by state and federal databases. The policy also states that a hit is to be treated only as reasonable suspicion until verified through official channels.

These provisions demonstrate legitimate law-enforcement applications, but they also illustrate why the General Assembly may wish to define more precisely:

- What constitutes an authorized search;
- Whether routine traffic matters are included;
- What “other tasks” may encompass;
- When an investigation must already exist;
- What documentation must accompany a historical search; and
- What verification is required before enforcement action.

Clear statutory standards could reduce differing interpretations among agencies while preserving legitimate uses.

Source citation pending insertion from the Pulaski County policy exhibit in the ARAP repository.

3. “Ongoing investigation” and retention remain central questions

Jacksonville Police Department Policy 10-28 states that ALPR data will be stored for a period not exceeding 150 days. The policy also states that captured data may be retained as part of an ongoing investigation and destroyed at the conclusion of the investigation or related criminal action.

The Jacksonville public-information packet compares that policy with statutory language stating that ALPR data or images shall be destroyed unless being used for an ongoing investigation.

The available records do not conclusively answer:

- Whether all collected data may routinely remain searchable for 150 days;
- Whether an investigation must exist before data is preserved;
- Whether data may be retained because it could become relevant later;
- Who authorizes extended retention;
- What case documentation is required; or
- How destruction is verified when an investigation ends.

Legislative clarification would help agencies apply a uniform standard.

Source citation pending insertion from the Jacksonville policy and public-information exhibits in the ARAP repository.

4. Sharing networks can involve large numbers of participating agencies

Jacksonville records identified participation in two ALPR information-sharing environments:

Platform	Participating agencies reported
Flock Safety	1,210
Motorola VehicleManager	2,839

Participation in a network does not establish that every participating agency accessed Jacksonville data or that every Jacksonville record was shared. It does demonstrate the potential scale of modern interagency connectivity.

The current law does not clearly resolve whether:

- Standing network availability constitutes “sharing”;
- Each outside access must be approved individually;
- Data must indicate evidence of a specific offense before access;
- Out-of-state agencies must comply with Arkansas restrictions;
- The originating agency must retain a complete access log; or
- Vendor-managed default sharing is permissible.

These issues warrant express legislative treatment rather than differing local interpretations.

Source citation pending insertion from the Jacksonville network-sharing exhibit in the ARAP repository.

5. Administrative oversight records are not consistently available

Jacksonville’s response reported no identified misuse investigations or corrective-action reports. It also reported that several other categories - such as compliance reviews, annual compliance summaries, policy-compliance reviews, and supervisory audit records - were not available. Vendor audit records were described as unavailable to the local end user.

The absence of those records does not prove that oversight did not occur or that misconduct occurred. It raises a narrower administrative question: What minimum oversight records should every agency be required to create, retain, and make available?

Potential statewide requirements could include:

- Periodic supervisory audits;
- User-access reviews;
- Search-justification reviews;
- Retention and deletion verification;
- Sharing-access reviews;
- Misuse complaint procedures;
- Corrective-action records; and
- Annual public compliance summaries.

Source citation pending insertion from the Jacksonville response exhibit in the ARAP repository.

6. Local record custody may depend on the technology vendor

Jacksonville’s records distinguish between information available directly from the local agency and records reported as maintained by a technology provider or unavailable to the local end user.

This raises questions concerning governmental control of public records and accountability for vendor-operated systems:

- Which records must remain within the agency's custody?
- Must agencies have direct access to complete audit and sharing logs?
- May an agency rely on a vendor's inability or unwillingness to produce a record?
- Must contracts require data export in a usable format?
- Who verifies permanent deletion?
- Which contractual terms govern when online terms change?

A public agency should remain responsible for statutory compliance even when a contractor stores or administers the information.

Source citation pending insertion from the Jacksonville vendor-custody exhibit in the ARAP repository.

Documented Sherwood Disclosure Example

7. Sherwood released a detailed set of ALPR records for an unrelated vehicle

On June 30, 2026, a requester submitted Sherwood Police Department Request CITY-2026-112, seeking ALPR images, timestamps, and location data for a specifically identified vehicle between June 1 and July 1, 2026.

The request identified the vehicle but did not claim that the requester:

- Owned the vehicle;
- Had permission from its owner;
- Represented the owner; or
- Possessed another legal interest in it.

The Sherwood records portal marked the request completed and displayed 85 responsive files.

Source: Sherwood Police Department Records Request CITY-2026-112, request-details portal, pp. 1-2.

The production included approximately 85 corresponding images and a spreadsheet containing plate information, capture dates and times, vehicle descriptors, camera locations, and geographic coordinates. The photographs depicted the same vehicle at different dates, times, and locations.

Source: Request for Clarification and Preservation of Records, Ark. Code Ann. § 12-12-1808, pp. 1-3; representative image and spreadsheet exhibits on p. 3.

This was not a single incidental photograph. The production constituted a structured series of observations capable of identifying:

- The vehicle;

- Its visible license plate;
- Dates and precise times;
- Camera locations;
- Direction of travel; and
- Repeated presence at different locations.

The requester stated that the vehicle had been selected without a personal relationship to its owner and that no ownership or authorization had been asserted.

8. Sherwood officials were asked to explain the disclosure

On July 14, 2026, the requester sent a written request for clarification and record preservation to the Sherwood Police Department and copied the Mayor, City Attorney, and City Council members.

The correspondence asked:

25. What legal authority supported the release;
26. Whether ownership or legal entitlement had been verified;
27. What verification procedures were used;
28. Whether the Department considered its procedures consistent with § 12-12-1808;
29. Whether policies or training would be reviewed;
30. Whether the vehicle owner was notified; and
31. What office or position authorized the release.

The requester also asked the City to preserve internal correspondence, legal review, routing documents, approval records, and communications with the City Attorney.

Source: Request for Clarification and Preservation of Records, pp. 1-2.

The available email record shows that the correspondence was sent to the Police Department and the listed municipal recipients. One council-member address generated a delivery failure; the record does not show comparable failures for the other recipients.

Source: Gmail record titled “Request for Clarification and Preservation of Records related to FOIA request CITY-2026-112,” pp. 1-3.

As of July 22, 2026, ARAP has not received a substantive written response identifying the legal basis for the disclosure, the verification performed, the approving office, whether the owner was notified, or whether corrective review occurred.

This lack of a substantive response is not presented as proof that a statutory violation occurred. It demonstrates that the present law does not clearly establish:

- A required agency review process;
- A deadline for a written determination;
- Independent complaint review;
- Notice to an affected vehicle owner;

- Mandatory incident reporting;
- Preservation requirements; or
- Corrective-action procedures.

Legislative Significance

The records reviewed demonstrate that modern ALPR systems involve more than an officer observing a plate in public. They can create searchable collections containing vehicle images, plate numbers, dates, precise times, locations, directions of travel, descriptive characteristics, user searches, and interagency access information.

The available records support legislative review in five principal areas:

Statutory clarity

Key terms such as “ongoing investigation,” “evidence of an offense,” “lawful purpose,” “used,” “shared,” and “disclosure” should be defined with sufficient precision for consistent statewide application.

Uniform administration

Agencies should follow common standards for searches, retention, audits, reporting, outside access, and public disclosure.

Governmental control

Public agencies should retain meaningful control over records, settings, and audit information even when the system is operated through a private vendor.

Disclosure safeguards

The General Assembly should determine when identifiable historical vehicle-location records may be released and what verification, review, logging, notification, and complaint procedures should apply.

Independent accountability

A statewide administrative review mechanism could provide guidance and oversight without relying exclusively on criminal prosecution, civil litigation, or voluntary local responses.

Preliminary Conclusion

The records reviewed do not support a predetermined conclusion that ALPR technology should be prohibited or that every questioned practice is unlawful.

They do support a conclusion that Arkansas agencies are administering systems capable of collecting, retaining, searching, sharing, and disclosing information on a scale that merits renewed legislative attention.

ARAP therefore respectfully recommends that the General Assembly conduct a formal interim review of Ark. Code Ann. §§ 12-12-1801 through 12-12-1808 and consider updated statewide standards addressing:

- Authorized searches;
- Retention and destruction;
- Data sharing and interstate access;
- Administrative audits;
- Vendor accountability;
- Public reporting;
- Disclosure of identifiable records;
- Owner notification;
- Complaint review; and
- Enforcement and remedies.

Publication note: Before distribution to legislators, replace each “citation pending” note with the final ARAP evidence number and pinpoint citation from the project repository.

ATTACHMENT B

Jurisdiction-by-Jurisdiction Findings Matrix

Supporting the Request for Legislative Review of Ark. Code Ann. §§ 12-12-1801 Through 12-12-1808

Prepared by the Arkansas Accountability Project - ARAP

Date: July 22, 2026

Purpose and Method

This attachment compares selected automatic license plate reader (ALPR) records obtained from four Arkansas jurisdictions: Cabot, Sherwood, Jacksonville, and Pulaski County. The matrix is intended to identify recurring statutory and administrative questions. It is not a final legal determination of compliance or noncompliance.

Each entry is classified as follows:

- Documented: Directly supported by a record reviewed by ARAP.
- Partially documented: The available record addresses the subject but does not resolve every relevant question.
- Not identified in records reviewed: ARAP did not locate the information in the materials presently reviewed. This does not establish that the record or practice does not exist.
- Requires clarification: The record raises a question that cannot be resolved from the production alone.

Executive Comparison Matrix

Review Area	Cabot	Sherwood	Jacksonville	Pulaski County
Written ALPR policy reviewed	Documented	Documented	Documented	Documented
Large-scale collection documented	Documented	Documented through audit and detection records	Documented through agency reporting	Partially documented
Public practice-and-usage reporting	Documented	Requires further review	Documented	Partially documented
False or unconfirmed alert reporting	Documented in Cabot report	Requires further review	Requires further review	Requires further review
Historical search records reviewed	Partially documented	Documented through audit exports	Partially documented	Partially documented
Search-reason fields present	Requires further review	Documented	Requires further review	Requires further review
Traffic-related use identified	Broad policy language; specific use review continuing	Traffic-related searches identified in audit records	Requires further review	Traffic-related category identified in usage records
Data-retention policy	Documented	Documented	Documented	Documented
Extended retention tied to ongoing investigation	Policy language reviewed; implementation unclear	Policy language reviewed; implementation unclear	Policy language reviewed; implementation unclear	Policy language reviewed; implementation unclear
Outside-agency or network sharing	Documented in available records	Documented at substantial scale	Documented through two platforms	Requires further review
Out-of-state network participation	Requires further review	Documented	Network scale documented; state-by-state access requires clarification	Requires further review
Native or machine-readable audit records	Some spreadsheet records produced	Documented	Several vendor records reported unavailable to local end user	Partially documented
Administrative compliance reviews	Requires further review	Requires further review	Reported unavailable in several categories	Requires further review
Public disclosure of identifiable ALPR data	No comparable example presently identified	Documented through CITY-2026-112	No comparable example presently identified	No comparable example presently identified
Agency response to disclosure concern	Not applicable to records reviewed	No substantive response received as of July 22, 2026	Not applicable to records reviewed	Not applicable to records reviewed
Principal legislative issue	Reporting definitions and scale	Disclosure, sharing, searches, oversight, and local accountability	Vendor custody, sharing-network scale, and administrative records	Breadth of authorized use, traffic-related categories, and policy consistency

Jurisdiction 1 - Cabot Police Department

Records reviewed

The Cabot production includes License Plate Reader Policy 305.1, public practice-and-usage reports, supporting statistical spreadsheets, incident or alert data, procurement and vendor materials, and related FOIA correspondence. Cabot Policy 305.1 states that the Department may use license plate readers to detect violations of law, recover stolen property, locate missing persons, apprehend fugitives, assist investigations, and perform other tasks under the policy. The policy was implemented September 13, 2022.

Documented findings

A. Collection scale and reported outcomes

A Cabot report for a six-month period states that 7,365,404 plates were scanned, 1,022 positive alerts occurred, 763 matches did not correlate to the alert, and 13 matches were reported as resulting in an arrest and prosecution. The same report states that 762 of the non-correlating matches were associated with the mobile Axon LPR system and one involved a Flock state-read error.

A separate Cabot reporting period for January through June 2025 identified 7,023,170 scans, 279 positive alert matches, 3 reported false hits, and 12 matches reported as resulting in arrest and prosecution. The supporting spreadsheet categorized the 279 alerts as warrants, sex-offender alerts, other, stolen vehicles, and stolen plates. The meaning of the “Other” category was not established in the summary materials reviewed.

B. Reporting exists but terminology needs clarification

Cabot’s records demonstrate that the Department creates public statistical reports. This is a positive transparency practice. The reports also illustrate the difficulty of comparing results when terms are not uniformly defined.

- Whether an “arrest and prosecution” means charges were merely referred or formally filed;
- Whether each arrest was directly caused by an ALPR alert;
- Whether an alert contributed only indirectly to a broader investigation;
- How false hits are verified and entered;
- Whether one event may be counted in more than one category; and
- What types of activity fall within the “Other” category.

C. Broad authorized-use language

Cabot’s policy authorizes uses including detecting violations of law, assisting investigations, and performing other tasks under the policy. This language may be operationally useful, but it raises legislative questions concerning whether the statute should distinguish among serious criminal investigations, wanted-person and stolen-vehicle alerts, routine traffic violations, minor offenses, intelligence gathering, historical searches, and other administrative or law-enforcement tasks.

Questions requiring additional clarification

32. What documentation is required before a historical search is performed?
33. Must a search be linked to a case or incident number?
34. Who reviews broad or descriptive searches?
35. How are false hits verified and recorded?
36. How is “arrest and prosecution” defined?
37. What is included in the “Other” alert category?
38. What audit records are maintained for searches by outside agencies?
39. How are records retained beyond the ordinary period connected to an ongoing investigation?

Preliminary legislative significance

Cabot provides one of the clearest examples of both the scale of collection and the need for standardized outcome definitions. The records support statewide reporting standards but do not, by themselves, establish improper operation.

Jurisdiction 2 - Sherwood Police Department

Records reviewed

The Sherwood materials include a written ALPR policy, search and audit logs, network-audit exports, public transparency information, a public-records production involving one specifically identified vehicle, associated images and spreadsheet data, follow-up correspondence to city officials, and evidence of delivery to most listed recipients. Sherwood produced machine-readable search and network records containing fields such as user or organization information, networks searched, license plate, search reason, case number, filters, search time, search type, text prompt, and moderation information.

Documented findings

A. Detailed search and network records exist

Sherwood produced substantial audit datasets rather than only summary documents. These records can permit independent review of search dates and times, search purposes, entered reasons, case-number fields, search filters, types of searches, organizations involved, and networks accessed. The production demonstrates that modern ALPR oversight can require review of much more than camera counts or hot-list alerts.

B. Outside-agency access and interstate connectivity

Sherwood transparency and audit records indicate that its ALPR environment is connected to numerous outside agencies, including agencies located outside Arkansas. The existence of a connected agency or network does not prove that every connected agency accessed every Sherwood record.

- Default versus individually approved sharing;
- Access for minor or traffic-related matters;
- Whether each access is tied to evidence of a particular offense;
- Whether out-of-state agencies are bound by Arkansas restrictions;
- Whether Sherwood can revoke or audit each access;
- Whether access continues after an investigation ends; and
- Whether standing access is legally different from a specific disclosure.

C. Traffic-related searches

Sherwood audit records include searches associated with traffic-related infractions or purposes. These records do not, standing alone, establish that the searches were unlawful. They support legislative clarification concerning whether the phrase “lawful purpose” or other statutory language permits ALPR searches for routine traffic enforcement, noncriminal traffic matters, civil enforcement, equipment or registration issues, or searches conducted on behalf of another jurisdiction.

D. Release of unrelated vehicle records

On June 30, 2026, a requester submitted Request CITY-2026-112 seeking detections for a specifically identified Arkansas vehicle. The request did not claim ownership, consent, representation, or another legal interest in the vehicle. The Sherwood portal marked the request completed and displayed 85 responsive files.

The production included images and a spreadsheet containing license plate information, capture dates and precise times, vehicle descriptors, camera names and directions, geographic coordinates, and repeated detections of the same vehicle. The follow-up letter characterized the production as approximately 85 detections and asked Sherwood to identify the statutory authority supporting the release.

E. Follow-up request and absence of substantive response

On July 14, 2026, the requester sent the Police Department, Mayor, City Attorney, and City Council members a written request for clarification and preservation. The correspondence asked about the legal authority supporting release, verification of ownership or entitlement, approval procedures, owner notification, policy or training review, and preservation of related records.

One council-member email address generated a delivery failure. The available record does not show comparable delivery failures for the other listed recipients. As of July 22, 2026, no substantive response has been received addressing the requested legal authority, verification, authorization, owner notification, or corrective review. This is not presented as proof of an intentional statutory violation.

Questions requiring additional clarification

40. What legal interpretation supported the CITY-2026-112 release?
41. Was requester identity, ownership, consent, or entitlement verified?
42. Who authorized the disclosure?
43. Was the registered owner notified?
44. Does continuing network access constitute sharing under Arkansas law?
45. What limits apply to out-of-state agency access?
46. What review applies to searches for traffic-related matters?
47. Are case numbers mandatory for historical searches?
48. Who audits incomplete, generic, or overly broad search reasons?
49. What process applies when a disclosure concern receives no substantive local response?

Preliminary legislative significance

Sherwood presents the broadest combination of issues presently documented by ARAP: historical searches, traffic-related use, interstate access, large machine-readable audit records, disclosure of identifiable vehicle-location information, and the absence of a clearly defined complaint-resolution process.

Jurisdiction 3 - Jacksonville Police Department

Records reviewed

The Jacksonville materials include an ALPR policy, public statistical information, administrative-record responses, information-sharing network data, records-custody information, citizen-information materials derived from the agency response, and audit and oversight categories identified as available or unavailable.

Documented findings

A. Written policy and retention language

Jacksonville's policy establishes a general retention period of up to 150 days and recognizes retention beyond that period when records form part of an ongoing investigation. The policy language raises unresolved questions about whether an investigation must already exist, what document associates retained data with that investigation, who approves extended retention, how continuing necessity is reviewed, and what confirms final destruction.

B. Administrative oversight records

Jacksonville reported zero identified misuse investigations and zero corrective-action reports. It also reported that compliance reviews, annual compliance summaries, policy-compliance reviews, and supervisory audit records were not available, and that vendor audit records were not available to the local end user. The absence of a record does not prove the absence of oversight or misuse. It raises the narrower question of what oversight documentation agencies should be required to create and retain.

C. Vendor custody and governmental control

Jacksonville's response distinguishes between records maintained locally and records maintained by or accessible through a vendor. This creates significant policy questions concerning direct agency access to audit records, public-records obligations, contractual export requirements, deletion verification, and the adequacy of supervision when vendor audit records are unavailable to the local end user.

D. Size of sharing networks

Jacksonville reported participation in ALPR information-sharing environments containing 1,210 participating agencies through Flock Safety and 2,839 participating agencies through Motorola VehicleManager. These figures describe network participation; they do not prove that Jacksonville shared every detection with every listed agency. They demonstrate that modern ALPR systems can operate through networks much larger than a single city, county, or state.

Questions requiring additional clarification

50. Which Jacksonville records are controlled locally and which are controlled by vendors?
51. Can Jacksonville obtain complete user, search, sharing, and deletion audit logs?
52. How many participating agencies are actually authorized to access Jacksonville data?
53. Does Jacksonville approve each outside access?
54. What geographic or offense-based restrictions apply?
55. Are out-of-state accesses reviewed separately?
56. What compliance reviews are performed even where a formal report is not created?

57. Should supervisory audit records be mandatory?

Preliminary legislative significance

Jacksonville illustrates two central statewide issues: large-scale network connectivity and government reliance on vendor-controlled records. It supports statutory requirements ensuring that public agencies retain full access to the records needed for oversight and FOIA compliance.

Jurisdiction 4 - Pulaski County Sheriff's Office

Records reviewed

The Pulaski County materials include General Policy 08-018, effective June 15, 2021; a separate Flock Cameras policy issued July 9, 2025; public-records request materials; usage or offense-type reporting; and records raising questions about traffic-related categories. General Policy 08-018 states that LPR technology may be used to detect violations of law, recover stolen property, locate missing persons, apprehend fugitives, assist investigations, and perform other tasks. The policy defines a hit as an LPR read matched to a hot list and states that a hit or alert should be treated only as reasonable suspicion until verified through official channels.

Documented findings

A. Multiple policy documents

The records include an older general LPR policy and a later Flock-specific policy. The 2025 Flock policy states that the technology may scan and identify plates appearing on selected hot lists and may store images for later review relating to criminal activity or missing persons. It also contains a reference to the Code of Virginia, despite being issued by an Arkansas agency. That reference may be a drafting or template issue. It does not establish that the policy is legally invalid, but it supports careful review of whether each Arkansas agency policy has been independently tailored to Arkansas law.

B. Broad operational purposes

Policy 08-018 includes detecting violations of law and performing other tasks. It also establishes authorized systems, training requirements, program oversight by designated command staff, assignment and movement of mobile equipment, and verification of alerts through official channels.

C. Traffic-related usage category

A Pulaski County usage report included a traffic-infraction category. The existence of that category does not establish unlawful use. It raises a statutory question concerning whether routine traffic-related searches are authorized and, if so, which offenses qualify, whether the matter must be criminal, whether a case or incident number is required, whether searches can be performed for outside agencies, whether minor traffic purposes justify historical location searches, and how such uses are reported to the public.

D. Verification before enforcement action

Pulaski County's policy explicitly states that an alert provides reasonable suspicion only until verified through official channels. This is an important safeguard. The General Assembly may wish

to codify a statewide requirement that officers independently verify the plate, issuing state, vehicle description, alert status, and continued validity of the underlying record before taking significant enforcement action.

Questions requiring additional clarification

58. Which Pulaski County policy currently controls when the two policies differ?
59. Why does the 2025 policy reference Virginia law?
60. How are traffic-infraction searches authorized and documented?
61. Does every historical search require a case number?
62. What audit process reviews compliance with search restrictions?
63. How long are records retained, and how is deletion verified?
64. What external agencies may access Pulaski County data?
65. What documentation exists for supervisory and annual compliance review?

Preliminary legislative significance

Pulaski County illustrates the need for policy consistency, Arkansas-specific drafting, clear treatment of traffic-related uses, and mandatory verification before enforcement action.

Cross-Jurisdiction Findings

Finding 1 - Similar policies use broad terms differently

Cabot and Pulaski County policies authorize detecting violations of law, assisting investigations, and performing other tasks. Jacksonville and Sherwood policies also contain general operational language. The common use of broad terms may permit reasonable operational flexibility, but it also creates the possibility of inconsistent interpretations.

Legislative question: Should Arkansas law define a limited set of authorized purposes and separately identify activities requiring heightened justification or supervisory approval?

Finding 2 - Reporting exists, but results are not directly comparable

Cabot reports millions of scans, alerts, non-correlating matches, arrests, and prosecutions. Jacksonville also produces public statistical information. Other records are presented in different formats or at different levels of detail.

Legislative question: Should every agency use the same definitions, reporting period, calculation method, and final-outcome categories?

Finding 3 - "Ongoing investigation" is not consistently operationalized

Policies generally repeat or reflect statutory language permitting retention for an ongoing investigation. The records reviewed do not consistently identify required documentation, approval authority, review intervals, case linkage, closing procedures, or destruction verification.

Legislative question: Should extended retention require a documented case number, written finding, supervisor approval, periodic review, and recorded destruction?

Finding 4 - Sharing can occur through very large networks

Sherwood and Jacksonville records demonstrate connections to extensive interagency environments, including out-of-state entities.

Legislative question: Does standing access constitute sharing, and should each access be logged, justified, reviewable, and governed by Arkansas restrictions?

Finding 5 - Vendor control affects public accountability

Jacksonville reported vendor audit records unavailable to the local end user. Other agencies also rely on vendor platforms for searches, settings, retention, and network administration.

Legislative question: Should every ALPR contract require the public agency to maintain direct and exportable access to all records necessary for statutory compliance, auditing, and public-records responses?

Finding 6 - Public disclosure standards remain uncertain

Sherwood released a detailed series of identifiable records for a vehicle unrelated to the requester, then did not provide a substantive response to the documented request for clarification as of the stated review date.

Legislative question: Should the law establish explicit public-disclosure rules, verification requirements, owner notification, incident review, and an independent complaint process?

Finding 7 - Traffic-related use requires express treatment

Traffic-related purposes appear in Sherwood and Pulaski County usage records, while Cabot and Pulaski County policies broadly refer to violations of law.

Legislative question: Should routine traffic enforcement be authorized, restricted, or excluded, and what documentation should be required?

Recommended Statewide Minimum Standards

66. A governing-body-approved public policy;
67. Arkansas-specific legal references;
68. Defined authorized and prohibited uses;
69. A documented reason for every historical search;
70. Case or incident linkage when applicable;
71. Supervisory review of broad or sensitive searches;
72. Independent alert verification before enforcement action;
73. Complete user, search, sharing, and disclosure logs;
74. Written standards for ongoing-investigation retention;
75. Periodic review and destruction verification;
76. Direct agency access to vendor-maintained audit records;
77. Standardized public statistical reporting;
78. Rules governing interstate access;
79. Public-disclosure verification and approval procedures;

- 80. A process for notifying affected persons after improper disclosure;
- 81. Mandatory preservation and review of alleged misuse or disclosure incidents; and
- 82. An independent administrative complaint and compliance mechanism.

Conclusion

The four jurisdictions reviewed demonstrate different levels of documentation, reporting, network access, vendor dependence, and public disclosure. The records do not support treating every jurisdiction as identical, and they do not establish that every unresolved issue constitutes a legal violation.

They do establish that Arkansas agencies are operating systems with capabilities extending well beyond the isolated observation of a license plate. The combined records support a statewide legislative review designed to produce clear, uniform, and enforceable standards while preserving legitimate public-safety uses.

Editorial standard: ARAP distinguishes verified records from unresolved questions. “Not identified” means only that the information was not established in the records reviewed. It should not be interpreted as proof that a policy, record, safeguard, or practice does not exist.

Source note: This working attachment is based on records presently reviewed by ARAP. Final exhibit numbers and pinpoint citations should be inserted during assembly of the legislative packet.

Attachment C

Statutory Questions Under Arkansas Code Annotated §§ 12-12-1801 Through 12-12-1808

Prepared by the Arkansas Accountability Project - ARAP

Supporting the Request for Legislative Review of the Automatic License Plate Reader System Act

Date: July 22, 2026

Purpose

This attachment organizes the principal statutory questions arising from records reviewed by ARAP concerning automatic license plate reader systems used by Arkansas law-enforcement agencies.

It is not offered as a legal opinion or as a conclusion that any agency has violated Arkansas law. Its purpose is to identify areas in which the present statutory language may permit differing interpretations or may not clearly address the capabilities and administrative structure of modern ALPR systems.

The subchapter is known as the Automatic License Plate Reader System Act and consists of Ark. Code Ann. §§ 12-12-1801 through 12-12-1808.

Section-by-Section Review

§ 12-12-1801 - Title

Section 12-12-1801 identifies the subchapter as the Automatic License Plate Reader System Act.

Questions for legislative review

- Does the title adequately reflect that modern systems may perform functions beyond automated plate reading, including historical searches, vehicle-description searches, interagency data access, and pattern analysis?
- Should the act expressly state its legislative purposes, such as supporting legitimate law-enforcement investigations; protecting personal privacy and freedom of movement; limiting secondary uses of collected data; establishing uniform statewide administration; preserving governmental control over vendor-operated systems; and providing meaningful transparency and oversight?
- Would an express legislative-purpose section assist courts, agencies, records custodians, and local governments when interpreting ambiguous provisions?

Possible legislative response

- Consider adding a findings-and-purpose section explaining that the act governs not only the physical cameras, but also the collection, search, retention, analysis, sharing, disclosure, and deletion of information generated through an ALPR system.

§ 12-12-1802 - Definitions

The statute defines an automatic license plate reader system as one or more fixed or mobile automated high-speed cameras used with computer algorithms to convert license-plate images into computer-readable data. Captured plate data includes GPS coordinates, date and time, a photograph, the license-plate number, and any other data captured by or derived from the system. The definition also states that captured plate data does not include personal data.

Question 1 - What does “derived from” include?

- Modern platforms may generate or associate vehicle make, model or body type, color, distinguishing features, direction of travel, camera name, search history, alert status, confidence scores, associated vehicles, travel-pattern analysis, and records generated from descriptive or artificial-intelligence-assisted searches.
- Should the statute expressly identify these forms of derived information as captured plate data?

Question 2 - What is excluded as “personal data”?

- Does “shall not include any personal data” mean the system may not collect personal data?
- Does it mean that information becomes personal data only after linkage to another database?
- Does the exclusion remove linked owner information from the act’s protections?

- How should the statute address data that is not facially personal but can readily be associated with an identifiable person?

Question 3 - Does the definition cover all relevant systems?

- Systems operated by private contractors for public agencies;
- Cameras owned by private entities but made searchable by law enforcement;
- Mobile camera trailers and vehicle-mounted systems;
- Commercial camera networks and integrated surveillance systems;
- Plate data imported from another jurisdiction or vendor;
- Searches conducted by an agency that does not own a camera; and
- Data obtained through a shared national network.

Question 4 - Additional terms needing definition

- Access; Alert; Audit log; Confirmed match; Disclosure; Historical search; Hot list; Ongoing investigation; Outside agency; Search; Share or sharing; System administrator; Vendor; Vehicle-description search; and False or unconfirmed alert.

Possible legislative response

- Expand the definitions to cover the complete information lifecycle, including data generated, derived, imported, queried, displayed, exported, or made available through an ALPR platform.

§ 12-12-1803 - Restrictions on Use

Except as permitted by the statute, use of an ALPR system is unlawful. A state, county, or municipal law-enforcement agency may use a system to compare captured plate data with data held by specified state and federal databases and a law-enforcement database created for purposes of an ongoing investigation, for any lawful purpose.

Question 1 - What does “comparison” authorize?

- A search for a known plate across historical records;
- A partial-plate search;
- A search by color, make, body type, or vehicle feature;
- A search of vehicles present near a location during a time window;
- A travel-pattern search;
- An associated-vehicle or convoy search;
- A natural-language descriptive search;
- A multijurisdictional or nationwide historical search; and
- A search of records collected before an investigation began.

Question 2 - What limits “for any lawful purpose”?

- Does it include any purpose otherwise lawful for a police officer, only purposes connected to listed databases, criminal investigations, routine traffic enforcement, civil enforcement, intelligence gathering, officer-safety inquiries, or assistance to another agency?
- Should the statute specify whether routine traffic infractions qualify, whether the offense must be criminal, whether a documented investigation must exist, and whether an agency may perform a search for another agency?

Question 3 - When must an “ongoing investigation” exist?

- Must an investigation exist before a plate is entered into a database?
- Must it be documented by a case or incident number?
- May a generalized intelligence file qualify?
- Who determines that an investigation is ongoing, and how is its conclusion documented?

Question 4 - What search documentation should be required?

- Case number; incident number; specific reason; requesting agency; authorizing supervisor; date range; geographic scope; and offense under investigation.

Question 5 - Private systems and public access

- Whether private businesses and homeowners’ associations may operate systems;
- Whether private entities may provide direct portal access to law enforcement;
- Whether law enforcement may search privately collected data without legal process;
- Whether privately captured data becomes subject to the act when accessed by government; and
- Whether equivalent retention and disclosure protections apply.

Possible legislative response

- Separate authorized activities into defined categories: real-time hot-list comparison, historical plate search, descriptive or analytical search, outside-agency request, emergency search, and non-law-enforcement use, with corresponding purpose, documentation, approval, and audit standards.

§ 12-12-1804 - Protections

Captured plate data obtained for authorized purposes may not be used or shared for another purpose and generally may not be preserved for more than 150 days. Data may be retained as part of an ongoing investigation and must be destroyed when the investigation or related criminal action ends. Governmental entities generally may not sell, trade, or exchange captured plate data; data indicating evidence of an offense may be shared with other law-enforcement agencies.

Question 1 - Is 150 days a maximum or routine retention period?

- May every detection automatically be retained for the full 150 days?
- Must data be destroyed earlier when no operational need exists?
- Should categories of data have different retention periods?
- Should search and access logs be retained longer than images?
- May vendors retain backups, cached copies, or derived data after agency deletion?

Question 2 - What makes data “part of an ongoing investigation”?

- Who designates the data; when designation occurs; what written record is required; whether a case number is mandatory; whether bulk data may be preserved; how often retention is reviewed; who removes the designation; and how destruction is documented.

Question 3 - What does “indicates evidence of an offense” mean?

- Must the data itself indicate evidence of a specific offense?
- Is a hot-list match sufficient?

- May sharing occur before independent verification?
- Does a traffic infraction qualify as an offense?
- May an entire dataset be shared, or only relevant records?
- May standing network access be provided before a particular offense exists?

Question 4 - Does continuing network access constitute sharing?

- Distinguish a single-record response, temporary investigative access, standing access to all detections, regional or national networks, vendor-managed defaults, and searches that return results without transferring a file.

Question 5 - Interstate access

- Whether Arkansas data may be made available nationwide; whether requesting agencies must certify lawful purpose; whether uses must comply with Arkansas law; whether local approval is required; whether Arkansas restrictions follow the data; and what remedies apply to misuse.

Question 6 - Twenty-four-hour updates

- What information must be updated; who is responsible when a vendor performs the update; whether failed updates should suspend alerts; whether proof of update is required; and how stale data affects enforcement action.

Possible legislative response

- Create separate provisions for default retention, investigative retention, audit-log retention, backup deletion, individual record sharing, standing network access, interstate access, and deletion certification.

§ 12-12-1805 - Practice and Usage Data Preservation

The records reviewed by ARAP show substantial differences in how agencies describe scans, alerts, false hits, arrests, prosecutions, searches, and outside access.

Question 1 - What statistics must be preserved?

- Total detections and unique plates; alerts and confirmed alerts; false or unconfirmed alerts; historical and descriptive searches; outside-agency searches; records shared; stops; vehicle or person searches; arrests; charges; prosecutions; dismissals; convictions; recoveries; missing persons located; extended retention; disclosure requests; misuse complaints; and corrective actions.

Question 2 - How should outcomes be defined?

- Clarify terms such as hit, match, positive alert, arrest, and prosecution; identify whether an alert directly caused an outcome; and distinguish plate-reading errors, stale database information, and vehicle mismatch.

Question 3 - Who receives and audits the reports?

- Identify the receiving state entity; require public posting and a uniform electronic format; provide for audits; define consequences for incomplete reporting; and require vendors to supply necessary data.

Question 4 - Preservation period

- Determine retention periods for statistical reports, search logs, access logs, disclosure logs, sharing logs, policy versions, configuration records, training records, misuse investigations, and deletion certifications.

Possible legislative response

- Adopt a standardized statewide reporting form and require annual agency certification by the chief executive and system administrator.

§ 12-12-1806 - Use of Data and Data-Derived Evidence

This section raises questions about verification, significant false alerts, evidence derived from broad searches, and notice or discovery when ALPR information contributes to enforcement action.

Question 1 - Verification before enforcement action

- Require verification of the complete plate, issuing state, vehicle description, current alert status, database accuracy, subject identity, and continuing validity of the underlying record.

Question 2 - Incorrect data and high-risk encounters

- Consider documentation, supervisor review, source-database correction, notice, preservation of body-camera and dispatch records, reporting of high-risk actions, and corrective training.

Question 3 - Evidence derived from broad searches

- Determine whether different approval or evidentiary standards should apply to known-plate, partial-plate, vehicle-description, area-and-time, convoy, pattern-of-life, and multijurisdictional searches.

Question 4 - Notice and discovery

- Consider notice to defendants, production of search criteria and audit logs, identification of data sources, relevant vendor documentation, confidence information, and retention or sharing history.

Possible legislative response

- Codify minimum verification requirements and require preservation of the audit trail when ALPR-derived information materially contributes to a stop, search, arrest, warrant application, or prosecution.

§ 12-12-1807 - Penalties

The practical availability of remedies may be limited because affected persons may not know their data was searched, retained, shared, accessed, or disclosed.

Question 1 - Are existing remedies practically available?

- Consider whether notice and an independent complaint process are needed for meaningful enforcement.

Question 2 - Should the law distinguish among types of violations?

- Negligent disclosure; intentional misuse; unsupported searches; false justifications; failure to delete; improper sharing; failure to maintain logs; supervisory failures; vendor over-retention; and personal-purpose searches.

Question 3 - Agency and supervisory accountability

- Consider consequences for failure to adopt a compliant policy, broad sharing without review, inability to obtain vendor logs, failure to investigate complaints, failure to preserve records, continued use after known failures, and deficient reporting.

Question 4 - Independent enforcement

- Authorize a state entity to receive complaints, conduct audits, issue guidance, require corrective action, suspend access, refer intentional misconduct, and publish findings.

Possible legislative response

- Create graduated remedies addressing individual misuse, negligent administration, repeated noncompliance, and intentional concealment, with due-process protections.

§ 12-12-1808 - Privacy and Disclosure

Captured plate data or Office of Motor Vehicle data may be disclosed only to the registered person, with that person's written consent, or when disclosure is permitted by the federal Driver's Privacy Protection Act as it existed on January 1, 2013. The section also includes protections involving certain protection orders.

Question 1 - Relationship with the Arkansas Freedom of Information Act

- The Sherwood Police Department released a detailed set of ALPR images and associated location data in response to a routine FOIA request from a person who did not claim ownership, consent, or another legal interest in the vehicle.
- Clarify whether § 12-12-1808 creates a specific exemption from general FOIA disclosure, what identity verification is required, what proof of registration or consent is sufficient, whether redaction can make records releasable, and whether agencies must provide a written legal basis.

Question 2 - Meaning of "disclosed"

- Does disclosure include providing images or spreadsheets, displaying search results, allowing portal access, making data searchable by another agency, communicating a location, exporting a report, sharing a screenshot, or providing derived location analysis?

Question 3 - Owner verification and consent

- Consider required identification, registration confirmation, joint-owner authority, consent authentication, retention of proof, identification of the approving custodian, and disclosure logging.

Question 4 - Notice of improper or mistaken disclosure

- Should notice state what information was released, to whom, when, the legal basis, remedial action, complaint contact information, and available remedies?

Question 5 - Complaint and review process

- After the Sherwood disclosure, a written clarification and preservation request was sent to the Police Department and copied to the Mayor, City Attorney, and City Council. As of July 22, 2026, no substantive written response has been received.
- The statute does not clearly establish who investigates, response deadlines, required findings, owner notice, outside reporting, corrective action, appeal rights, or independent review.

Question 6 - Protection orders and joint registration

- Clarify how a protection order is flagged, which agency maintains the restriction, how quickly it takes effect across connected systems, how changes are handled, whether disclosure logs are audited for protected vehicles, and whether similar safety orders merit protection.

Possible legislative response

- Create a specific ALPR disclosure procedure requiring a written request, statutory authority, identity and registration verification, authenticated consent, supervisory or legal approval, disclosure logging, redaction standards, notice of mistaken disclosure, record preservation, written complaint findings, and independent review.

Fourth Amendment Considerations: Aggregated Location Data

The United States Supreme Court has not issued a controlling decision holding that the collection, retention, or searching of automatic license plate reader data is categorically a Fourth Amendment search.

Two Supreme Court decisions nevertheless provide an important framework for evaluating modern vehicle-location databases: *United States v. Jones*, 565 U.S. 400 (2012), and *Carpenter v. United States*, 585 U.S. 296 (2018).

These cases do not determine the constitutionality of Arkansas ALPR practices. They demonstrate that Fourth Amendment analysis may be affected not only by whether individual movements occur in public, but also by the duration, comprehensiveness, retrospective searchability, and cumulative revealing nature of the information collected.

United States v. Jones

In *United States v. Jones*, law-enforcement officers installed a GPS tracking device on a vehicle and monitored the vehicle's movements for 28 days. The Supreme Court concluded that the government's conduct constituted a Fourth Amendment search.

The majority relied principally on the government's physical occupation of private property for the purpose of obtaining information. The concurring opinions addressed a broader concern especially relevant to modern location databases.

Justice Alito's concurrence reasoned that prolonged GPS monitoring could infringe a reasonable expectation of privacy even though individual movements on public roads might be observable. Justice Sotomayor separately observed that GPS monitoring generates a precise and comprehensive record of public movements that can reveal private associations and personal details.

The constitutional relevance of *Jones* to ALPR review is therefore not that every roadside camera observation is equivalent to attaching a GPS device. Rather, the case recognizes that prolonged and comprehensive aggregation may present a privacy question different from an officer observing a vehicle at one place and time.

Carpenter v. United States

In *Carpenter v. United States*, the government obtained historical cell-site location records covering 127 days without a warrant supported by probable cause. The Supreme Court held that the government's acquisition of the historical location information constituted a Fourth Amendment search.

The Court emphasized the depth, breadth, comprehensive reach, and retrospective nature of the information. It declined to apply mechanically the traditional rule that information held by a third party receives no Fourth Amendment protection.

The Carpenter decision was expressly narrow. It did not decide every question involving business records, real-time tracking, conventional surveillance, security cameras, or all other location technologies.

Relevance to Automatic License Plate Reader Data

ALPR records differ from both cell-site records and a GPS device physically attached to a vehicle. An ALPR camera generally records a vehicle only when it passes a particular camera, and ordinary camera deployment does not involve the physical trespass central to the Jones majority opinion.

Modern networked ALPR systems may nevertheless share several characteristics that concerned the Court:

- Automatic collection without individualized suspicion;
- Retention of historical location records;
- Precise dates, times, camera locations, and directions of travel;
- Retrospective searches conducted after an investigation begins;
- Aggregation of observations from many cameras and jurisdictions;
- The ability to identify recurring routes, destinations, or associations;
- Collection involving large numbers of people not suspected of wrongdoing; and
- Creation of a historical record that would have required substantial human resources to reproduce through traditional surveillance.

The constitutional question may therefore become more significant as a database becomes broader, longer-lasting, more comprehensive, and more readily searchable.

The Significance of Quantity and Duration

A police officer observing a vehicle on a public road generally presents a different question from the government maintaining a searchable historical record of many vehicle observations.

One observation: A vehicle was seen at one public location at one time.

Aggregated record: A database shows repeated appearances of the same vehicle across multiple locations, dates, directions of travel, and jurisdictions over an extended period.

The aggregated record may reveal recurring destinations, routines, associations, medical visits, religious attendance, political activity, employment patterns, or family relationships that no single observation would reveal.

Jones and Carpenter support the proposition that courts may consider the cumulative revealing power of prolonged location monitoring rather than examining each observation only in isolation. They do not establish a numerical rule declaring that 28 days, 127 days, or any other specific period is automatically constitutional or unconstitutional.

Arkansas's 150-Day Retention Period

Arkansas law generally permits captured plate data to be preserved for no more than 150 days, with additional retention when the data is part of an ongoing investigation.

That statutory maximum is longer than the 28 days of GPS monitoring considered in *Jones* and the 127 days of historical cell-site information obtained in *Carpenter*. The comparison is relevant to legislative review, but it does not establish that Arkansas ALPR retention is unconstitutional because the technologies, collection methods, coverage, and legal issues are not identical.

Questions for legislative review include:

83. Is 150 days intended as an automatic default or an outside maximum?
84. How many observations concerning one vehicle may accumulate during that period?
85. Can records from multiple Arkansas and out-of-state jurisdictions be searched together?
86. Can system users reconstruct recurring routes, destinations, or patterns?
87. May records collected before an investigation began be searched after the investigation is opened?
88. What level of suspicion, documentation, or legal process should be required for a prolonged historical search?
89. Should access requirements become more demanding as the date range, geographic scope, number of cameras, or number of jurisdictions increases?
90. Should broad, pattern-based, convoy, or multijurisdictional searches require supervisory approval, a court order, or another heightened legal basis?
91. Should Arkansas distinguish between a short-term plate lookup and prolonged location-history analysis?
92. Should records not connected to an investigation be deleted earlier than the statutory maximum?

The Public-Roads or Plain-View Argument

The fact that a vehicle travels on a public road is relevant, but it does not necessarily resolve every constitutional issue involving long-term aggregation.

Neither *Jones* nor *Carpenter* held that every fact exposed in public receives Fourth Amendment protection. They do show that the Supreme Court has treated prolonged technological tracking and comprehensive historical location records differently from ordinary visual observation.

The question is not merely whether an officer could lawfully observe one license plate in public. The question is whether government may automatically collect, preserve, combine, and retrospectively search thousands or millions of public observations to reconstruct movements over time.

That question remains developing law as applied specifically to ALPR systems.

Recommended Legislative Considerations

1. Define a basic plate lookup separately from a historical location search;

2. Establish graduated requirements based on the duration, geographic scope, and breadth of a search;
3. Require a case or incident number for historical searches;
4. Require supervisory approval for lengthy, multijurisdictional, descriptive, convoy, or pattern-based searches;
5. Consider whether judicial authorization should be required for searches capable of producing a prolonged movement history;
6. Limit automatic retention to a period justified by documented operational need;
7. Require earlier deletion of records not connected to an investigation;
8. Prohibit bulk exports without heightened authorization;
9. Require complete search, access, and sharing logs;
10. Provide notice and discovery when ALPR history materially contributes to a warrant, stop, search, arrest, or prosecution; and
11. Require periodic legislative review as system capabilities expand.

Legal Limitation

Jones and Carpenter should not be cited for the proposition that every ALPR scan is a Fourth Amendment search.

A more supportable formulation is: Although the Supreme Court has not resolved the Fourth Amendment status of modern networked ALPR databases, United States v. Jones and Carpenter v. United States demonstrate that the duration, comprehensiveness, retrospective searchability, and cumulative revealing power of location information may be constitutionally significant.

Authorities: United States v. Jones, 565 U.S. 400 (2012); Carpenter v. United States, 585 U.S. 296 (2018). Official opinions and case materials are maintained by the Supreme Court of the United States.

Cross-Statutory Questions

1. Who is the statewide administering authority?

- Standard forms; agency registration; policy review; statistical reporting; compliance audits; complaint review; technical standards; vendor requirements; and statewide findings.

2. Who owns and controls vendor-maintained records?

- Clarify that records remain under governmental control when created, stored, or processed by a contractor.

- Contracts should require direct agency access to detection records, user lists, search logs, sharing logs, disclosure logs, configuration history, retention settings, deletion records, security incidents, and subcontractor information.

3. What happens when technology changes?

- Require review before activating artificial-intelligence search tools, vehicle fingerprinting, convoy analysis, pattern-of-life tools, face or occupant analysis, private-network integration, national historical searches, predictive alerts, or other materially new capabilities.

4. What level of local approval is required?

- Consider governing-body approval for initial deployment, camera expansion, contract renewal, new retention settings, broader sharing, interstate access, new analytical features, and private-network integration.

5. Should policies be public before activation?

- Require publication of a policy, completion of training, establishment of audit procedures, and identification of a responsible administrator before live collection begins.

Recommended Legislative Review Questions

1. What uses did the General Assembly intend to authorize when it enacted the act?
2. Are historical and descriptive searches covered by the existing language?
3. Is 150 days a routine retention period or an outer limit?
4. What documentation makes data part of an ongoing investigation?
5. Does standing network access constitute sharing?
6. Must shared data itself indicate evidence of a specific offense?
7. Are routine traffic infractions an authorized ALPR purpose?
8. Must outside agencies comply with Arkansas limitations?
9. Should Arkansas agencies approve and log each outside access?
10. Must agencies maintain direct access to vendor audit records?
11. What statistics are necessary to measure accuracy and outcomes?
12. How should false alerts and significant mistaken stops be reported?
13. Does § 12-12-1808 restrict disclosure under the Arkansas FOIA?
14. What verification is required before releasing vehicle-location records?

15. Should vehicle owners receive notice of improper disclosure?
16. Who investigates alleged misuse or disclosure violations?
17. What administrative remedy should exist before litigation or criminal prosecution?
18. What statewide entity should oversee compliance?
19. Should Arkansas law distinguish an isolated plate lookup from a prolonged or multijurisdictional location-history search?
20. Should heightened approval or judicial process apply as the duration, geographic scope, or comprehensiveness of an ALPR search increases?
21. How should Jones and Carpenter inform legislative safeguards without assuming that every ALPR scan is a Fourth Amendment search?

Preliminary Conclusion

Arkansas Code Annotated §§ 12-12-1801 through 12-12-1808 establishes important limits on ALPR use, retention, sharing, and disclosure. The statutory text recognizes that captured plate data includes photographs, dates, times, coordinates, plate numbers, and derived information; restricts use to designated purposes; limits general retention to 150 days; permits specified law-enforcement sharing; and limits disclosure to defined circumstances.

The records reviewed by ARAP suggest that current systems may now involve historical analysis, descriptive searches, persistent interstate access, vendor-controlled audit records, and public disclosure decisions not expressly addressed in operational detail by the original legislation.

These questions support a comprehensive legislative review. They do not require a predetermined conclusion that ALPR technology should be prohibited or that every unresolved practice is unlawful.

Editorial standard: This attachment distinguishes statutory text, documented records, interpretive questions, and policy recommendations. Legal questions are presented for legislative and professional legal review rather than resolved by ARAP.

Attachment D

Sherwood Request CITY-2026-112 and Responsive-Records Summary

Prepared by the Arkansas Accountability Project - ARAP

Supporting the Request for Legislative Review of Ark. Code Ann. §§ 12-12-1801 Through 12-12-1808

Date: July 22, 2026

Purpose

This attachment documents the submission, completion, production, and subsequent follow-up associated with Sherwood Police Department public-records request CITY-2026-112.

Its purpose is to provide legislators with a factual example of how identifiable automatic license plate reader records were released in response to an ordinary public-records request submitted by a person who did not claim ownership of, consent concerning, or another legal interest in the identified vehicle.

This attachment does not offer a final legal conclusion that the release violated Arkansas law. It identifies the records produced, the circumstances stated in the request and follow-up correspondence, and the questions that remain unresolved.

I. Request Summary

A. Request identification

Field	Information
Public body	Sherwood Police Department
Request number	CITY-2026-112
Date submitted	June 30, 2026
Status shown by portal	Completed
Requested date range	June 1, 2026 through July 1, 2026
Subject	ALPR detections for one specifically identified Arkansas vehicle
Delivery method	Electronic production through the public-records portal

Source note: *Sherwood Police Department public-records portal, Request CITY-2026-112, pages 1-2.*

B. Language of the request

The request sought “all ALPR data captures, images, timestamps, and location data” recording a specifically identified Arkansas vehicle during the stated date range.

- The license plate number;
- The state of registration;
- The vehicle make or type;
- The vehicle color; and
- The requested time period.

The request also asked for expedited processing based on Sherwood’s stated 150-day data-purge policy and requested a specific legal justification for any withheld or redacted information.

Source note: *Sherwood public-records portal request details for CITY-2026-112.*

C. What the request did not state

- That the requester was the registered owner;
- That the requester operated the vehicle;
- That the requester had the registered owner’s consent;

- That the requester represented the owner;
- That the requester was an insurer, lienholder, attorney, or other authorized agent;
- That the requester was involved in an accident or legal proceeding concerning the vehicle; or
- That the requester had another legal interest in the vehicle.

The follow-up correspondence expressly stated that no ownership, consent, or legal interest had been claimed and that the vehicle was selected without a personal connection to the requester.

Source note: *July 14, 2026 Request for Clarification and Preservation of Records, page 1.*

II. Records Produced

A. Portal production count

The Sherwood public-records portal displayed 85 responsive files and provided a “Download All” option. The portal page showed files corresponding to different dates, locations, and cameras.

The portal count should be described as 85 responsive files, rather than assuming that every file represents a distinct detection. The accompanying spreadsheet contains a different row count, as discussed below.

Source note: *Sherwood public-records portal, CITY-2026-112, page 2.*

B. Spreadsheet production

The production included a Flock Safety search-results spreadsheet containing 80 tabular records associated with the identified plate.

- License plate and state;
- Capture date and capture time;
- Vehicle make, body type, color, and visible characteristics;
- Capture network;
- Camera or location name and direction of travel;
- Latitude and longitude; and
- Image filename.

Because the portal displayed 85 responsive files while the spreadsheet contains 80 rows, the two numbers should not be represented as identical. The available records do not conclusively establish whether the difference resulted from duplicate image files, supporting files, omitted spreadsheet rows, or another production detail.

Source note: *Flock Safety Search Results CSV produced in response to CITY-2026-112.*

C. Image production

The responsive files included repeated photographs of the same vehicle and visible license plate at different dates, times, locations, and travel directions.

- Brockington Road, northbound and southbound;
- Warden Road near Saltgrass Steakhouse;
- Kellogg Acres Road near the northern city limits;

- Highway 107;
- Jacksonville Cutoff Road;
- West Maryland Avenue;
- Landers Road; and
- Wildwood Avenue.

The images include visual overlays or filenames identifying the camera location, direction, and capture time.

D. Time span of the production

The spreadsheet records span approximately June 1 through June 28, 2026, within the requested June 1 through July 1 period. The production therefore documented repeated observations of one vehicle over approximately four weeks.

E. Nature of the information released

- A particular vehicle and its visible plate;
- The date and precise time of each recorded observation;
- The camera location and direction of travel;
- Descriptive vehicle characteristics;
- Geographic coordinates; and
- Repeated appearances at different points within the city.

This was more extensive than the release of a single photograph or isolated observation.

III. Evidentiary Significance of the Production

A. The request tested disclosure procedures

The follow-up letter states that the vehicle was selected at random while present within the City of Sherwood for the purpose of evaluating the Department's records-disclosure practices.

The requester did not misrepresent ownership or authorization. The request openly identified the vehicle and asked for its ALPR records. The resulting production therefore presents a direct question about the procedures used by the public body before releasing identifiable vehicle-location records.

Source note: *July 14, 2026 clarification and preservation correspondence, page 1.*

B. The production created a record of movement

A single plate image may show only that a vehicle was observed at one place and time. A series of images and spreadsheet rows can reveal repeated movements or travel patterns.

The production supplied enough information to reconstruct multiple appearances of the same vehicle across different Sherwood camera locations over several weeks.

The relevant legislative question is not merely whether the plate was visible from a public road. It is whether a public body may release a compiled series of time-stamped, location-associated records to a person who has not demonstrated a legal relationship to the vehicle.

C. The registered owner may not know of the disclosure

- Whether the registered owner was contacted;
- Whether the owner consented;
- Whether the owner was notified after release; or
- Whether the owner was given an opportunity to challenge the disclosure.

The follow-up letter specifically asked whether the owner had been notified, but no substantive answer has been received as of July 22, 2026. The absence of an answer does not establish that notice did not occur; it means owner notification has not been documented in the records presently available to ARAP.

IV. Request for Clarification and Preservation

A. Date and recipients

On July 14, 2026, a written request for clarification and preservation of records was sent to the Sherwood Police Department and copied to the Mayor, City Attorney, and members of the Sherwood City Council.

Source note: *Gmail transmission record dated July 14, 2026.*

B. Questions submitted to Sherwood

93. What statutory authority or legal interpretation supported the release?
94. Was any verification performed to determine whether the requester was the registered owner or otherwise legally entitled to receive the records?
95. If verification occurred, what procedures or documentation were used?
96. If no verification occurred, did the Department believe its current procedures complied with Ark. Code Ann. § 12-12-1808?
97. Had the Department reviewed, or did it intend to review, its policies or training concerning release of captured ALPR data?
98. Was the registered owner notified that the records were released?
99. What office or position authorized the release?

Source note: *Request for Clarification and Preservation of Records, pages 1-2.*

C. Preservation request

- Internal communications;
- Legal review;
- Routing records;
- Approval documentation;
- Communications among Department personnel;
- Communications with the City Attorney; and
- Records reflecting the basis for the disclosure decision.

The stated purpose was to preserve the evidence needed to determine how the disclosure decision was made.

D. Neutral framing of the follow-up

The letter expressly stated that it was not intended as an allegation that a statutory violation had occurred. It described the request as part of a broader evidence-based legislative project examining implementation of Ark. Code Ann. §§ 12-12-1801 through 12-12-1808.

V. Delivery Record

A. Successfully transmitted correspondence

The available Gmail record shows that the July 14 correspondence was addressed to the Sherwood Police Department and copied to the listed city officials.

B. One documented delivery failure

One council-member address generated a server response stating that the message was blocked and permanently failed for that recipient.

The accurate formulation is: The clarification request was sent to the Police Department, Mayor, City Attorney, and listed City Council members. One council-member address generated a documented delivery failure; the available record does not show comparable delivery failures for the other recipients.

Source note: Gmail delivery-failure notice included with the July 14, 2026 transmission record.

C. Limits of the email evidence

- That every other recipient opened the message;
- That the correspondence was internally routed;
- That legal counsel reviewed it;
- That officials discussed it;
- That an investigation occurred; or
- That no internal response or corrective action was taken.

Those matters remain unresolved.

VI. Response Status

As of July 22, 2026, ARAP has not received a substantive written response answering:

- The legal authority supporting the disclosure;
- Whether ownership or consent was verified;
- What verification procedure was used;
- Who authorized the release;
- Whether the registered owner was notified;
- Whether the Department reviewed its procedures;
- Whether related records were preserved; or
- Whether corrective action was taken.

The absence of a substantive response should not be described as proof that the release was unlawful, that officials intentionally ignored the matter, that no internal review occurred, that records were not preserved, or that any person acted in bad faith.

It does demonstrate that the requester has not received the information needed to resolve the disclosure questions.

VII. Questions Presented by the Sherwood Example

A. Public disclosure under § 12-12-1808

- The principal statutory question is whether identifiable captured plate data may be released through the ordinary Arkansas Freedom of Information Act process when the requester has not shown registration in the requester's name, written consent from the registered owner, or another basis permitted by applicable law.

B. Requester verification

- Possible safeguards include government-issued identification, registration verification, authenticated written consent, verification of legal representation, identification of the statutory exception relied upon, written approval by a supervisor or attorney, and retention of supporting documents.

C. Release logging

- A disclosure log could document the requester, vehicle or plate involved, date of release, records released, legal authority, reviewing official, approval, redactions, and owner notification.

D. Owner notification

- The law does not clearly establish whether the vehicle owner must be informed when identifiable ALPR data is released, a release is later determined to be mistaken, verification was incomplete, records were released to an unrelated requester, or an unauthorized person accessed the data.

E. Independent complaint review

- The Sherwood example illustrates the absence of an obvious independent administrative process when local officials do not substantively answer a documented disclosure concern.

VIII. Evidentiary Limitations

100. The production establishes that Sherwood released responsive records; it does not establish the custodian's legal reasoning.
101. The portal shows 85 responsive files, while the spreadsheet contains 80 rows. The available evidence does not fully explain the difference.
102. The images and spreadsheet document repeated vehicle observations, but ARAP has not contacted or identified the registered owner.

103. ARAP does not know whether the registered owner received separate notice.
104. The available records do not establish whether internal legal review occurred before or after release.
105. The email record proves one delivery failure but does not prove actual reading by the other recipients.
106. No substantive response has been received by ARAP as of the stated date, but that does not establish that no internal investigation or discussion occurred.
107. This example is offered to demonstrate a statutory and administrative question, not to accuse any named official of intentional wrongdoing.

IX. Recommended Legislative Considerations

108. A specific procedure for requesting captured plate data;
109. Verification of the requester's legal entitlement;
110. Identification of the statutory basis for release;
111. Supervisory or legal approval;
112. A complete disclosure log;
113. Preservation of records supporting the decision;
114. Notice to the registered owner when data is mistakenly or improperly released;
115. Mandatory internal review following a disputed release;
116. Written findings provided within a defined period;
117. Reporting of confirmed unauthorized disclosures;
118. Corrective training or access restrictions when procedures fail; and
119. Independent administrative review when a local response is unavailable or inadequate.

X. Evidence Index for Attachment D

Item	Description
D-1	Sherwood public-records portal page for CITY-2026-112
D-2	Flock Safety search-results CSV containing 80 tabular records
D-3	Responsive ALPR image files
D-4	Representative screenshot of the responsive image production
D-5	Representative screenshot of the spreadsheet production
D-6	July 14, 2026 clarification and preservation letter
D-7	Gmail transmission record identifying recipients
D-8	Delivery-failure notice for one council-member address
D-9	Original downloaded response archive from

Final exhibit numbers should be assigned through ARAP's master evidence-management workbook before publication.

Preliminary Conclusion

CITY-2026-112 provides a documented example in which a public-records requester obtained a collection of identifiable ALPR photographs and associated location information for a vehicle the requester did not claim to own or represent.

The records establish the request, the completed production, the types of data released, the subsequent request for clarification, and one documented recipient-delivery failure. They do not establish the City's legal interpretation, whether verification occurred, whether the owner was notified, or whether internal review or corrective action followed.

Those unanswered questions are the reason the example is relevant to the General Assembly.

The incident supports legislative consideration of clearer disclosure rules, requester verification, record preservation, owner notification, written agency determinations, and independent complaint review under Ark. Code Ann. § 12-12-1808.

Editorial standard: ARAP distinguishes documented facts, unresolved questions, and policy recommendations. The absence of a response or record is not treated as proof of misconduct.

Attachment E

Public Reference Summary of Sherwood ALPR Images and Spreadsheet Records

PUBLIC REDACTED EDITION

Prepared by the Arkansas Accountability Project - ARAP

Supporting the Request for Legislative Review of Ark. Code Ann. §§ 12-12-1801 Through 12-12-1808

Date: July 22, 2026

Purpose

The unredacted legislative evidentiary edition of Attachment E contains representative photographs, a visible license plate, precise timestamps, named camera locations, geographic coordinates, and a spreadsheet extract associated with Sherwood public-records request CITY-2026-112.

To avoid republishing the same identifiable vehicle-location information that prompted the legislative disclosure questions, those images and identifying data fields are omitted from this public-reference edition.

I. What the Redacted Records Demonstrate

- The Sherwood public-records portal displayed 85 responsive files.
- The accompanying Flock Safety CSV contained 80 tabular records.
- The records documented repeated observations of one vehicle over approximately four weeks.
- The production included dates, precise times, named cameras, directions of travel, vehicle descriptors, and geographic-coordinate information.
- The records could be sorted chronologically and grouped by camera to identify recurring routes and repeated observations.
- At least one automated vehicle-make classification was inconsistent with the vehicle shown in the photographs, illustrating the need for independent verification.

II. Information Removed from the Public Edition

- All photographs showing the vehicle or license plate;
- The complete or partial license plate number;
- Exact latitude and longitude coordinates;
- Spreadsheet screenshots containing identifying plate data;
- Image filenames that could be used to reconstruct the complete unredacted series; and
- The full chronological image archive.

III. Evidentiary Preservation

The original unredacted files remain preserved as restricted evidentiary material. Their omission from this public edition does not alter the factual summaries in Attachments D and F or the legal and policy questions presented in Attachment C.

Authorized legislators, legislative staff, counsel, auditors, or other appropriate reviewers may examine the unredacted materials through a controlled evidentiary process.

IV. Legislative Significance

The public version preserves the central legislative point without exposing a particular vehicle's location history: a compiled ALPR production can reveal substantially more than a single observation on a public road.

The records support review of requester verification, owner consent and notice, historical search standards, retention, data quality, public disclosure, audit logging, and the distinction between isolated observations and aggregated movement records.

V. Limitations

120. The public edition does not permit independent visual confirmation that the same plate appears in each image.
121. The public edition does not reproduce the precise geographic coordinates or complete chronological dataset.
122. A recorded vehicle observation does not establish unlawful activity or identify the driver.
123. The existence of an automated classification error in one field does not establish a system-wide error rate.
124. The unredacted evidentiary materials should be consulted when visual or field-level verification is necessary.

Preliminary Conclusion

The redacted Attachment E retains the evidentiary meaning of the Sherwood production while avoiding unnecessary republication of identifiable vehicle-location records. The full source materials remain preserved for authorized review.

Editorial standard: This public-reference edition removes identifying content while preserving the documented scope, structure, and legislative significance of the records.

Attachment F

July 14, 2026 Clarification and Preservation Correspondence

Prepared by the Arkansas Accountability Project - ARAP

Supporting the Request for Legislative Review of Ark. Code Ann. §§ 12-12-1801 Through 12-12-1808

Date: July 22, 2026

Purpose

This attachment preserves and explains the written correspondence sent to Sherwood officials after the Police Department released the records associated with public-records request CITY-2026-112.

The correspondence requested identification of the legal authority supporting the disclosure, an explanation of any requester-verification procedure, identification of the office or position that authorized the release, clarification concerning notification of the registered owner, review of agency policy or training, and preservation of records reflecting how the disclosure decision was made.

The letter expressly stated that it was not alleging that a statutory violation had occurred. Its purpose was to obtain sufficient information to document how Ark. Code Ann. § 12-12-1808 was interpreted and administered.

I. Background

Sherwood Police Department Request CITY-2026-112 sought ALPR images, timestamps, and location information for a specifically identified Arkansas vehicle.

The requester did not state or imply that he was the registered owner, had consent from the registered owner, represented the owner, or possessed another legal interest in the vehicle.

The Sherwood Police Department completed the request and made 85 responsive files available through its public-records portal. The production also included a spreadsheet containing plate information, capture dates and times, vehicle descriptors, camera locations, and geographic coordinates.

The July 14 correspondence described the production as approximately 85 ALPR detections associated with one vehicle and explained that the vehicle had been selected without a known personal connection to the requester for the purpose of evaluating the Department's disclosure procedures.

II. Date and Method of Transmission

The clarification and preservation request was transmitted by email on July 14, 2026, at approximately 10:28 a.m.

The email was sent to the Sherwood Police Department's public-information address and copied to addresses identified for the Mayor, City Attorney, and members of the Sherwood City Council.

III. Subject and Stated Purpose

The correspondence was titled:

Request for Clarification Regarding Release of ALPR Records and Request for Preservation of Related Records

It identified Ark. Code Ann. § 12-12-1808 as the principal provision requiring clarification and was framed as a request for factual and legal explanation, not as an accusation.

IV. Questions Submitted to Sherwood

125. What statutory authority or legal interpretation supported release of these records?
126. Was any verification performed to determine whether the requester was the registered owner or otherwise legally entitled to receive the records?
127. If verification was performed, what procedures or documentation were used?
128. If no verification was performed, did the Department believe its current procedures complied with Ark. Code Ann. § 12-12-1808?
129. Had the Department reviewed, or did it intend to review, its policies or training concerning release of captured ALPR data?
130. Was the registered owner notified that the records were released?
131. What office or position authorized release of the records?

V. Preservation Request

The correspondence asked Sherwood to preserve all records related to CITY-2026-112 pending resolution of the disclosure questions, including:

- Internal communications;
- Legal review;
- Routing records;
- Approval documentation;
- Communications among Police Department personnel;
- Communications with the City Attorney; and
- Records reflecting the basis for the disclosure decision.

The preservation request was intended to protect the records necessary to evaluate how the decision was made and to prevent loss through routine deletion, mailbox retention schedules, vendor-system deletion, or ordinary records-management practices.

VI. Neutral and Nonaccusatory Framing

The correspondence stated that it was not intended as an allegation that a statutory violation had occurred. It explained that clarification was requested so the facts could be accurately documented as part of a broader legislative research project examining implementation of Ark. Code Ann. §§ 12-12-1801 through 12-12-1808.

This language gave the City an opportunity to explain its legal interpretation, correct any factual misunderstanding, identify procedures not visible in the produced records, document owner notification, describe any internal review, and provide evidence of corrective action if applicable.

VII. Transmission Record

The available Gmail record shows that the correspondence was addressed to the Police Department and copied to multiple City of Sherwood email addresses associated with municipal officials.

One listed council-member address generated a mail-server response stating that the message was blocked and permanently failed for that recipient.

The precise evidentiary statement is:

The correspondence was sent to the Sherwood Police Department, Mayor, City Attorney, and listed City Council members. One council-member address generated a documented delivery failure. The available record does not show comparable delivery failures for the other listed recipients.

VIII. Limits of the Transmission Evidence

- The email record does not prove that every successfully addressed recipient opened the message;
- It does not prove that every listed address was current;
- It does not establish that the message was internally routed;
- It does not establish that legal counsel reviewed it;
- It does not establish that officials discussed it;
- It does not establish that an internal investigation occurred; and
- It does not establish that no corrective action was taken.

The record establishes transmission and one known delivery failure. It should not be overstated.

IX. Response Status

As of July 22, 2026, ARAP has not received a substantive written response answering the seven questions.

No response received by ARAP has identified:

- The statute or legal interpretation supporting the disclosure;
- Whether ownership or consent was verified;
- What verification procedure was used;
- The office or position that approved the release;
- Whether the registered owner was notified;
- Whether agency policy or training was reviewed;
- Whether the preservation request was implemented; or

- Whether corrective action occurred.

The absence of a substantive response is not presented as proof that the disclosure was unlawful, that officials acted intentionally, that no internal discussion occurred, that records were not preserved, or that no corrective action was taken. It establishes only that the requester has not received the information necessary to resolve those questions.

X. Legislative Significance

The July 14 correspondence is relevant because it demonstrates what happens after a member of the public raises a documented concern about the release of ALPR data.

The current statutory framework does not clearly establish:

- Which local official must investigate;
- Whether a written response is mandatory;
- A deadline for responding;
- Whether the registered owner must be notified;
- Whether the incident must be reported to a state entity;
- Whether related records must be preserved;
- Whether written findings must be issued;
- Whether corrective action must be documented;
- Whether the requester may appeal an inadequate response; or
- Which independent authority may review the matter.

The correspondence therefore highlights a potential gap between statutory restrictions and the practical process available to obtain an administrative determination.

XI. Recommended Legislative Considerations

1. Acknowledge a documented ALPR disclosure complaint within a defined period;
2. Preserve all related records immediately;
3. Identify the official assigned to conduct the review;
4. Determine the statutory basis for the disclosure;
5. Determine whether required verification occurred;
6. Identify who approved the release;
7. Determine whether the affected vehicle owner should be notified;
8. Issue written findings;
9. Document corrective action;
10. Report confirmed unauthorized disclosure to a designated state authority;
11. Provide an administrative appeal or independent review process; and
12. Retain the complaint, findings, and corrective-action records for a defined period.

XII. Documentary Exhibits

Item	Description
F-1	July 14, 2026 clarification and preservation letter
F-2	Gmail printout showing transmission and listed recipients
F-3	Delivery-failure notice for one council-member address
F-4	Word version of the clarification and preservation letter
F-5	PDF version of the clarification and preservation letter
F-6	Record of any later response received from Sherwood
F-7	Record of any follow-up communication sent by ARAP

XIII. Evidentiary Limitations

132. The correspondence documents the questions submitted; it does not establish the answers.
133. The Gmail record establishes sending and one delivery failure but does not prove that all other recipients read the message.
134. The absence of a response to ARAP does not prove that no internal review occurred.
135. The available records do not establish whether the preservation request was implemented.
136. The records do not establish whether the registered owner was notified separately.
137. No final legal determination concerning the underlying disclosure has been made.
138. The correspondence should be evaluated with Attachment D, which summarizes CITY-2026-112, and Attachment E, which presents representative responsive records.

Reproduced Correspondence

The following text reproduces the substance of the July 14, 2026 clarification and preservation letter for convenient legislative review.

Request for Clarification and Preservation of Records

Ark. Code Ann. § 12-12-1808

Via Email / Public Records Portal

Chief of Police

Sherwood Police Department

Cc: Mayor, City of Sherwood; Members, Sherwood City Council; City Attorney, City of Sherwood

Subject: Request for Clarification Regarding Release of ALPR Records and Request for Preservation of Related Records

Chief,

I write regarding Arkansas Freedom of Information Act Request CITY-2026-112. In response to that request, the Sherwood Police Department released approximately eighty-five Automated License Plate Reader detections associated with a specifically identified Arkansas vehicle.

My request did not state or imply that I was the registered owner of the vehicle, that I had the consent of the registered owner, or that I possessed any legal interest in the vehicle. The vehicle was selected at random while present within the City of Sherwood solely to evaluate the Department's records-disclosure practices.

The records released included a spreadsheet containing the vehicle's license plate number, capture dates and times, vehicle descriptors, camera locations, and GPS coordinates, together with approximately eighty-five corresponding ALPR images documenting the vehicle's movements within the City.

Arkansas Code Annotated § 12-12-1808 restricts disclosure of captured license plate reader data except under circumstances authorized by law. Because I did not identify myself as the registered owner or assert another statutory basis for disclosure, I respectfully request clarification regarding the legal authority relied upon in releasing these records.

Accordingly, I respectfully request responses to the following:

139. What statutory authority or legal interpretation supported release of these records?
140. Was any verification performed to determine whether the requester was the registered owner or otherwise legally entitled to receive the records?
141. If verification was performed, what procedures or documentation were used?
142. If no verification was performed, did the Department believe its current procedures complied with Ark. Code Ann. § 12-12-1808?
143. Had the Department reviewed, or did it intend to review, its policies or training concerning release of captured ALPR data?
144. Was the registered owner notified that the records were released?
145. What office or position authorized release of the records?

I also respectfully request that the Department preserve all records related to Request CITY-2026-112, including internal communications, legal review, routing records, approval documentation, and communications with the City Attorney, pending resolution of these questions.

This correspondence is not intended as an allegation that a statutory violation occurred. Rather, it seeks clarification so that the facts surrounding this disclosure can be accurately documented as part of a broader legislative research project examining implementation of Ark. Code Ann. §§ 12-12-1801 through 12-12-1808.

Respectfully,

[Requester name as reflected in the original correspondence]

Preliminary Conclusion

The July 14, 2026 correspondence provided Sherwood officials with written notice of the disclosure concern, identified the statutory issue, requested answers to seven specific questions, and asked that decision-making records be preserved.

The letter gave the City an opportunity to explain its legal interpretation, verification procedures, authorization process, owner-notification practices, and any corrective review.

As of the stated date, no substantive response has been received by ARAP.

The significance of Attachment F is procedural as well as factual: it demonstrates that the present law does not clearly provide a mandatory process for investigating, answering, preserving, reporting, or independently reviewing a disputed disclosure of identifiable ALPR records.

Editorial standard: Attachment F distinguishes the documented transmission, the questions asked, the known delivery failure, and the absence of a substantive response from conclusions about intent or legality.

Attachment G

Usage, Search, Retention, and Sharing Records from Other Arkansas Jurisdictions

Prepared by the Arkansas Accountability Project - ARAP

Supporting the Request for Legislative Review of Ark. Code Ann. §§ 12-12-1801 Through 12-12-1808

Date: July 22, 2026

Purpose

This attachment summarizes selected ALPR records obtained from Arkansas jurisdictions other than the Sherwood CITY-2026-112 disclosure example.

The records demonstrate how Arkansas agencies document collection volume, alerts, searches, offense categories, retention, interagency access, administrative oversight, and vendor-controlled records.

This attachment is not intended to rank agencies or declare any agency compliant or noncompliant. The records were produced in different formats, for different reporting periods, and in response to differently worded requests. Direct numerical comparisons should therefore be made cautiously.

The principal purpose is to identify recurring questions that may require uniform statewide standards.

I. Jurisdictions Included

- Cabot Police Department;
- Jacksonville Police Department;
- Pulaski County Sheriff's Office; and
- Sherwood Police Department records addressing searches, network access, and traffic-related use apart from the CITY-2026-112 disclosure.

Additional jurisdictions may be added as records are received and verified.

II. Record Categories Reviewed

- Written ALPR policies;
- Practice-and-usage reports;
- Camera and scan statistics;
- Alert and offense-type reports;
- Search and audit logs;
- Search-reason and case-number fields;
- Network-sharing and outside-agency access information;
- Retention provisions;
- Vendor agreements and system terms;
- Administrative-review records;
- Training and supervisory provisions; and
- FOIA correspondence explaining available and unavailable records.

The records do not establish that each agency maintains every category in the same format.

III. Cabot Police Department

A. Collection volume

Cabot records reviewed by ARAP document the collection of more than seven million plate scans during a six-month reporting period.

The records show that ALPR use can involve a very large number of observations relative to the number of reported enforcement outcomes.

This does not establish that the system is ineffective. It demonstrates the importance of clear and consistent outcome reporting.

B. Reported alerts and outcomes

- Positive alerts;
- Matches that did not correlate to the alert;
- False or unconfirmed matches;
- Arrests;
- Matters reported as leading to prosecution;
- Warrants;

- Stolen vehicles;
- Stolen plates;
- Sex-offender-related alerts; and
- An “Other” category.

The available records do not always explain whether “prosecution” means referral, charge filing, or final adjudication; whether an arrest was directly caused by the ALPR alert; whether one event generated multiple alert records; how false hits were verified; or what activities were included in the “Other” category.

C. Legislative significance

Cabot’s records demonstrate the need for standardized definitions. A statewide report should distinguish among:

1. Total scans and unique plates;
2. Initial and confirmed alerts;
3. Incorrect plate reads;
4. Accurate reads matched to stale or incorrect source records;
5. Stops and searches;
6. Arrests and charges filed;
7. Prosecutions initiated, dismissals, and convictions;
8. Vehicle recoveries; and
9. Missing-person or other public-safety outcomes.

D. Questions requiring clarification

1. What is included in “Other”?
2. How is “arrest and prosecution” defined?
3. Are reported prosecutions final outcomes or referrals?
4. Are false alerts reviewed by a supervisor?
5. Are alert errors categorized by cause?
6. Are historical and outside-agency searches included in public usage reports?
7. How are records associated with an ongoing investigation documented?

IV. Jacksonville Police Department

A. Written policy and retention

Jacksonville’s policy addresses use of ALPR technology and provides for a general retention period of up to 150 days. It also permits data to be retained as part of an ongoing investigation and requires destruction at the conclusion of the investigation or related criminal action.

The policy does not independently resolve whether every record is routinely retained for the full period, what documentation makes a record part of an ongoing investigation, who authorizes extended retention, how often continuing need is reviewed, or how final destruction is verified.

B. Sharing-network scale

Jacksonville records identified participation in large ALPR information-sharing environments.

Platform	Participating agencies reported
Flock Safety	1,210
Motorola VehicleManager	2,839

These figures describe the scale of the available networks. They do not prove that every participating agency accessed Jacksonville records or that all Jacksonville detections were available to every participant.

C. Questions raised by network participation

- Which agencies had active access to Jacksonville data;
- Which agencies were located outside Arkansas;
- Whether Jacksonville approved each access;
- Whether standing access was enabled;
- Whether offense-based restrictions applied;
- Whether outside users were required to enter case numbers;
- Whether Jacksonville could review every outside search;
- Whether vendor audit records were directly available to Jacksonville; and
- Whether Arkansas restrictions followed data accessed outside the state.

D. Administrative and audit records

Jacksonville responses indicated that some administrative or oversight records were unavailable or not available to the local end user, including certain compliance reviews, annual summaries, policy-compliance reviews, supervisory audit records, and vendor-maintained audit information.

The absence of such a record does not establish that no oversight occurred. It raises the narrower question of what minimum oversight records every agency should be required to create, obtain from its vendor, and preserve.

E. Vendor custody

- Governmental custody of vendor-generated records;
- Contractual access to complete logs;
- Exportability of data;
- Deletion verification;
- Preservation during disputes or litigation;
- Vendor subcontractors;
- System-setting histories; and
- Changes to online terms and platform functions.

F. Legislative significance

Jacksonville supports consideration of statutory requirements that every agency retain direct, exportable access to user lists, search logs, search reasons, case-number fields, outside-agency access logs, sharing configurations, system-setting history, retention and deletion records, complaint and misuse records, and vendor security or breach information.

V. Pulaski County Sheriff's Office

A. Multiple policy documents

The Pulaski County materials include a general license-plate-reader policy and a later Flock-specific policy.

The existence of multiple policies is not inherently problematic. It creates a need to determine which policy controls, whether the policies are consistent, whether the newer policy supersedes the earlier one, whether employees were trained on the controlling version, and whether statutory references are Arkansas-specific and current.

B. Broad authorized-use language

- Detecting violations of law;
- Recovering stolen property;
- Locating missing persons;
- Apprehending fugitives;
- Assisting investigations; and
- Performing other tasks under the policy.

These are legitimate law-enforcement purposes, but broad language may permit different interpretations among agencies.

C. Verification safeguard

Pulaski County's policy states that an ALPR hit should be treated as reasonable suspicion or an investigative lead until independently verified through official channels.

The General Assembly should consider whether all Arkansas agencies should be required to verify the complete plate number, issuing state, vehicle description, current alert status, validity of the source record, and whether the vehicle or plate is actually the subject of the alert.

D. Traffic-infraction category

A usage or offense-type report reviewed by ARAP included a traffic-infraction category. The category does not, by itself, establish improper use.

- Whether routine traffic infractions are an authorized ALPR purpose;
- Whether the infraction must be criminal rather than civil;
- Whether historical searches may be used for traffic enforcement;
- Whether the search must be linked to a documented case;
- Whether outside agencies may request traffic-related searches;
- Whether traffic uses should require supervisory approval; and
- How these searches should be reported publicly.

E. Arkansas-specific policy drafting

A later Flock-specific policy reviewed by ARAP included a reference to another state's law. That reference may result from a template or drafting error and does not establish that the agency acted under another state's law.

It does demonstrate why every Arkansas ALPR policy should receive legal and editorial review before adoption.

F. Legislative significance

Pulaski County records support statewide standards requiring one clearly identified controlling policy, Arkansas-specific statutory references, defined authorized and prohibited uses, independent verification before enforcement, clear treatment of traffic-related searches, search documentation, supervisory review, and periodic policy and training updates.

VI. Sherwood Search and Network Records

A. Machine-readable audit records

Sherwood produced search and network-audit records containing fields capable of identifying the user or agency, search date and time, plate searched, search reason, case-number field, search type, filters, network searched, text prompt, moderation or system fields, and other technical information.

These records demonstrate that meaningful ALPR oversight requires more than public scan totals.

B. Search-reason and case-number fields

The existence of a field does not establish that it is always completed or that entries are sufficiently specific.

The legislature should consider whether systems should reject a search when a required case number is absent, the reason is blank or generic, the reason does not identify an offense or investigation, the date range is unusually broad, multiple descriptive filters are used, or an assisting agency is not identified.

C. Traffic-related purposes

Sherwood audit records include searches associated with traffic-related infractions or purposes. These records support the same statewide question raised by Pulaski County: Does Arkansas law authorize historical or networked ALPR searches for routine traffic enforcement, and what limits should apply?

D. Outside-agency access

Sherwood records and public transparency information indicate connections with a large number of outside agencies, including agencies outside Arkansas.

The records do not establish that every listed agency accessed Sherwood detections. They demonstrate the potential scope of standing network access and the need to define sharing, access, search, export, temporary access, default sharing, interstate access, and vendor-managed networks.

E. Legislative significance

Sherwood's audit records support minimum statewide requirements for mandatory search justifications, case linkage where applicable, identification of requesting and assisting agencies, retention of complete search and access logs, supervisory review, auditing of broad searches, review of traffic-related uses, and separate reporting of out-of-state access.

VII. Cross-Jurisdiction Comparison

Issue	Cabot	Jacksonville	Pulaski County	Sherwood
Large collection volume documented	Yes	Yes or partially documented	Partially documented	Yes
Written policy reviewed	Yes	Yes	Yes, multiple policies	Yes
Public statistical reporting	Yes	Yes or partially available	Partially available	Requires additional review
Historical search records	Partially reviewed	Vendor/local availability issue	Partially reviewed	Detailed audit records produced
Traffic-related use identified	Requires clarification	Requires clarification	Yes	Yes
Outside-network access	Documented or under review	Large networks documented	Requires further review	Extensive connectivity documented
Vendor-controlled audit records	Relevant	Clearly identified concern	Relevant	Relevant
Ongoing-investigation retention language	Yes	Yes	Yes	Yes
Detailed disclosure example	No comparable example reviewed	No comparable example reviewed	No comparable example reviewed	Yes, Attachments D-F
Uniform outcome definitions	No	No	No	No
Statewide oversight process	Not identified	Not identified	Not identified	Not identified

VIII. Recurring Legislative Questions

1. Authorized use

- Real-time alerts;
- Known-plate historical searches;
- Partial-plate and vehicle-description searches;
- Location-and-time searches;

- Convoy or associated-vehicle searches;
- Traffic-related searches;
- Outside-agency assistance; and
- Emergency searches.

2. Search documentation

- A specific reason;
- A case or incident number;
- The suspected offense;
- The requesting agency and searching user;
- Date and geographic limits;
- Supervisory approval when appropriate; and
- A recorded audit trail.

3. Retention

- Whether 150 days is routine or a maximum;
- When an investigation must exist;
- What makes data part of an investigation;
- Who approves extended retention;
- How often retention is reviewed;
- When records must be destroyed; and
- How deletion is verified.

4. Sharing

- Sending one record;
- Responding to an investigative request;
- Temporary or standing access;
- Statewide or national network access;
- Vendor-default sharing; and
- Historical searches by outside agencies.

5. Interstate access

- Identify a lawful investigative purpose;
- Provide a case number and offense;
- Certify compliance with Arkansas restrictions;
- Limit use to the stated purpose;
- Retain no copy beyond authorized periods; and
- Submit to audit by the originating Arkansas agency.

6. Reporting

- Should every agency report the same categories using the same definitions and reporting period?

7. Vendor accountability

- Complete audit exports;
- Configuration histories;
- Access and sharing logs;
- Deletion certifications;
- Security-incident records;
- Subcontractor and data-location information; and
- Preservation capability.

8. Oversight

- Agency registration;
- Policy review;
- Annual reports;
- Complaint review;
- Compliance audits;
- Technical standards;
- Vendor requirements; and
- Public statewide reporting.

IX. Recommended Statewide Record Requirements

1. A governing-body-approved policy;
2. A list of authorized users and administrators;
3. User-training records;
4. Search logs and search reasons;
5. Case or incident references;
6. Historical-search parameters;
7. Outside-agency request records;
8. Sharing and access logs;
9. System-setting and configuration histories;
10. Retention-extension records;
11. Destruction and deletion certifications;
12. Alert-verification records;
13. False-alert and significant-error reports;
14. Complaints and misuse allegations;
15. Investigative findings and corrective-action records;
16. Public-disclosure logs;
17. Vendor contracts and applicable terms; and
18. Annual statistical and compliance reports.

X. Evidentiary Limitations

1. The jurisdictions produced records in different formats and for different periods.
2. The absence of a record in a production does not prove that the record does not exist.
3. A category label does not independently establish the facts of the underlying event.
4. Network participation does not prove access by every participating agency.
5. A search reason does not independently establish that the reason was accurate or inaccurate.
6. A traffic-related category does not independently establish that the use was lawful or unlawful.
7. A reported arrest or prosecution does not necessarily establish causation by the ALPR record.
8. Vendor unavailability does not prove intentional withholding by the local agency.
9. Policy language does not establish that every employee followed or violated the policy.
10. Final findings should be updated as additional records and agency explanations are received.

XI. Proposed Evidence Index

Item	Description
G-1	Cabot ALPR policy
G-2	Cabot practice-and-usage report
G-3	Cabot supporting alert or outcome spreadsheet
G-4	Jacksonville ALPR policy
G-5	Jacksonville information-sharing network records
G-6	Jacksonville administrative-record availability response
G-7	Pulaski County General Policy 08-018
G-8	Pulaski County Flock-specific policy
G-9	Pulaski County offense-type or usage report
G-10	Sherwood search audit
G-11	Sherwood network audit
G-12	Sherwood outside-agency transparency records
G-13	Comparative jurisdiction matrix
G-14	Supporting FOIA correspondence

Final exhibit numbers should be assigned through the ARAP master evidence-management workbook.

Preliminary Conclusion

The records from Cabot, Jacksonville, Pulaski County, and Sherwood demonstrate that Arkansas agencies use ALPR systems through different policies, reporting formats, audit structures, vendor relationships, search practices, and sharing configurations.

The records do not justify assuming that every jurisdiction operates identically or that every unresolved issue is unlawful.

They do establish recurring statewide questions concerning collection scale, authorized searches, traffic-related use, ongoing-investigation retention, sharing-network access, interstate use, vendor custody, administrative oversight, outcome reporting, and public accountability.

These recurring questions support legislative review and the adoption of uniform minimum standards under Ark. Code Ann. §§ 12-12-1801 through 12-12-1808.

Editorial standard: Attachment G distinguishes documented records, unresolved factual questions, legal interpretation issues, and policy recommendations. No absence, inconsistency, or category label is treated as proof of misconduct without additional supporting evidence.

Attachment H

Source and Evidence Index

Prepared by the Arkansas Accountability Project - ARAP

Supporting the Request for Legislative Review of Ark. Code Ann. §§ 12-12-1801 Through 12-12-1808

Date: July 22, 2026

Index Version: 1.0

Purpose

This attachment identifies the principal sources relied upon in the legislative review letter and Attachments A through G.

- Connect factual statements to supporting records;
- Distinguish original agency records from ARAP summaries;
- Identify documents that should be preserved in the evidence repository;
- Prevent duplicate or inconsistent exhibit numbering;
- Record whether a source contains identifiable or sensitive information;
- Identify public-reference and restricted evidentiary versions;
- Document evidentiary limitations; and
- Provide legislators and staff with an organized path to the underlying materials.

This index is not intended to imply that every listed record independently proves a statutory violation. Each record should be read in context and together with any accompanying agency explanation.

I. Evidence Classification

Classification	Meaning
Primary agency record	Created, maintained, or produced by a governmental agency
Vendor-generated agency record	Created through an ALPR vendor platform and produced or maintained for a public agency
Public-records correspondence	Request, response, clarification, preservation, or appeal communication

Policy or administrative record	Agency policy, procedure, training, audit, or oversight document
Contract or procurement record	Contract, invoice, purchase order, amendment, funding, or implementation record
Public transparency record	Agency or vendor transparency-portal information
ARAP analytical work product	Matrix, summary, calculation, timeline, or legislative analysis created from source records
Screenshot or preservation copy	Visual capture preserving the content or appearance of a source
External legal authority	Statute, case, legislative act, regulation, or other legal source
Unverified lead	Material preserved for follow-up but not relied upon as a confirmed factual source

II. Evidence-Handling Designations

Designation	Description
Public	Suitable for unrestricted public distribution
Public with redactions	May be distributed after removal of plates, personal information, coordinates, credentials, or other sensitive content
Legislative evidentiary	May be provided unredacted to legislators, staff, counsel, auditors, or authorized reviewers
Restricted repository	Preserved in the evidence repository but not ordinarily distributed
Working copy	Subject to verification, correction, replacement, or final exhibit assignment

III. Core Legislative Authorities

H-001 - Arkansas Automatic License Plate Reader System Act

Field	Information
Classification	External legal authority
Handling	Public

Ark. Code Ann. §§ 12-12-1801 through 12-12-1808. Primary subjects include definitions, authorized uses, retention, ongoing-investigation provisions, sharing, practice-and-usage reporting, data-derived evidence, penalties, and privacy or disclosure.

Supports

- Legislative review letter
- Attachment C
- Cross-jurisdiction analysis

Notes and limitations

- Preserve the original enacted act, current codified version, amendments, legislative history, relevant committee materials, and a dated PDF preservation copy.

H-002 - Arkansas Freedom of Information Act

Field	Information
Classification	External legal authority
Handling	Public

Ark. Code Ann. §§ 25-19-101 et seq. Relevant to public-records requests, response obligations, segregation of exempt and nonexempt material, custodian decisions, electronic production, and the relationship between general FOIA disclosure and specific statutory restrictions.

Supports

- Sherwood CITY-2026-112 discussion
- Attachment D
- Attachment F

Notes and limitations

- Key unresolved question: whether § 12-12-1808 operates as a specific disclosure restriction controlling over general FOIA access to captured plate data.

H-003 - Federal Driver's Privacy Protection Act

Field	Information
Classification	External legal authority
Handling	Public

Relevant to permitted uses of motor-vehicle information, consent, governmental and law-enforcement access, civil remedies, and the version incorporated by reference in Arkansas law.

Supports

- Interpretation of § 12-12-1808

Notes and limitations

- The final packet should identify the precise federal provisions incorporated by Arkansas law and preserve the version in effect on the date specified by the statute.

Notes and limitations

- These cases do not hold that every ALPR scan is a Fourth Amendment search. They are cited as constitutional context for legislative consideration of duration, aggregation, comprehensiveness, and retrospective searchability.

Supports

- Attachment C - Fourth Amendment Considerations: Aggregated Location Data
- Legislative discussion of historical ALPR searches and Arkansas's 150-day retention period

Supreme Court decision holding that government acquisition of extensive historical cell-site location information constituted a Fourth Amendment search. The decision emphasizes the depth,

breadth, retrospective reach, and revealing nature of aggregated location data while expressly limiting its scope.

Field	Information
Classification	External legal authority

H-005 - Carpenter v. United States

Citation: 585 U.S. 296 (2018)

Notes and limitations

- These cases do not hold that every ALPR scan is a Fourth Amendment search. They are cited as constitutional context for legislative consideration of duration, aggregation, comprehensiveness, and retrospective searchability.

Supports

- Attachment C - Fourth Amendment Considerations: Aggregated Location Data
- Legislative discussion of historical ALPR searches and Arkansas's 150-day retention period

Supreme Court decision holding that installation and use of a GPS tracking device on a vehicle constituted a Fourth Amendment search. The concurring opinions discuss the privacy significance of prolonged, comprehensive monitoring of public movements.

Field	Information
Classification	External legal authority

H-004 - United States v. Jones

Citation: 565 U.S. 400 (2012)

IV. Sherwood CITY-2026-112 Evidence Group

H-010 - Original Sherwood Public-Records Request

Field	Information
Classification	Public-records correspondence / primary agency portal record
Handling	Public with redactions or legislative evidentiary

Request CITY-2026-112, submitted June 30, 2026, sought all ALPR captures, images, timestamps, and location data for one specifically identified Arkansas vehicle during June 1 through July 1, 2026.

The request identified the plate and vehicle but did not assert ownership, consent, or another legal interest. The portal later marked the request completed.

Supports

- Attachment D, Sections I and II

- Attachment E background
- Legislative-letter disclosure example
- Attachment C discussion of § 12-12-1808

Notes and limitations

- Repository should include the portal PDF, screenshots, request text, completion status, file-list screenshot, download archive, and metadata showing capture date.

H-011 - Sherwood Portal Production Listing

Field	Information
Classification	Primary agency portal record
Handling	Legislative evidentiary / public with redactions

The portal displayed 85 responsive files and a Download All function. Listed filenames reflected multiple camera locations and capture dates.

Notes and limitations

- Describe the portal total as 85 responsive files. Do not automatically equate it with 85 unique detections because the accompanying CSV contains 80 rows.

H-012 - Flock Safety Search-Results CSV

Field	Information
Classification	Vendor-generated agency record
Handling	Restricted repository / legislative evidentiary

Filename: Flock_Safety_Search_Results_7-1-2026_10-49-46AM.csv. The CSV contains 80 tabular records associated with the identified vehicle. Fields include plate, state, date, time, make, body, color, identifiers, capture network, camera, geographic coordinates, and corresponding image filename.

Supports

- Attachment D production summary
- Attachment E spreadsheet analysis
- Time-span and location findings
- Data-quality example
- 85-file versus 80-row distinction

Notes and limitations

- At least one visible row classified the vehicle as Ram while surrounding records and photographs identify a Chevrolet pickup. Present this as an inconsistent automated descriptor, not a calculated error rate.

H-013 - Original Sherwood Responsive Image Archive

Field	Information
Classification	Vendor-generated agency records
Handling	Restricted repository / legislative evidentiary

Filename: Records_Request_Download_CITY-2026-112_2026-07-01--14-44-08(1).zip. The archive contains the images and files produced through CITY-2026-112.

Notes and limitations

- Preserve the original archive unchanged;
- Calculate and record a SHA-256 hash;
- Maintain a read-only master copy;
- Work only from duplicates;
- Record the original filename and download date;
- Do not rename the master archive; and
- Maintain redacted public-reference images separately.

H-014 - Representative Sherwood ALPR Images

Field	Information
Classification	Vendor-generated agency records
Handling	Legislative evidentiary / public with plate redaction

Representative images include Brockington Road northbound and southbound, Warden Road near Saltgrass Steakhouse, Kellogg Acres Road, Highway 107, West Maryland Avenue, Landers Road, Wildwood Avenue, and Jacksonville Cutoff Road.

Supports

- Attachment E public-reference summary; unredacted image series preserved in restricted repository
- Repeated-observation finding
- Visible plate and location detail
- Cumulative-record analysis

Notes and limitations

- The legislative evidentiary copy may retain the plate where necessary for verification. Public-reference copies should mask the plate and unnecessary coordinates.

H-015 - Screenshot of Responsive Image Production

Field	Information
Classification	Screenshot or preservation copy
Handling	Public with redaction / legislative evidentiary

The screenshot displays multiple image thumbnails and shows that the response contained repeated photographs from multiple dates and locations.

Supports

- Attachment D evidence summary
- Attachment E public-reference summary; responsive-file screenshot preserved in restricted repository
- Demonstration of production volume and repeated observations

H-016 - Screenshot of Spreadsheet Production

Field	Information
Classification	Screenshot or preservation copy

Handling	Public with redaction / legislative evidentiary
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The screenshot displays columns for plate, date, time, vehicle descriptors, capture network, camera, and coordinate information.

Supports

- Attachment D production description
- Attachment E public-reference summary; spreadsheet screenshot preserved in restricted repository
- Explanation of data fields
- Data-quality review

H-017 - Clarification and Preservation Letter

Field	Information
Classification	Public-records correspondence
Handling	Public

Dated July 14, 2026. The letter stated that approximately 85 ALPR detections had been released for a vehicle unrelated to the requester and asked Sherwood to identify the legal basis for release. It also requested answers concerning verification, authorization, owner notification, policy review, and record preservation.

Supports

- Attachment F
- Legislative-letter follow-up section
- Complaint and preservation recommendations

Notes and limitations

- The repository includes versions reflecting different requester names in draft or final documents. Before publication, designate one authenticated sent version as controlling and identify all others as drafts or superseded copies.

H-018 - Gmail Transmission Record

Field	Information
Classification	Public-records correspondence / transmission evidence
Handling	Public with email-address review

The Gmail record shows transmission to the Sherwood Police Department and copied municipal recipients.

Supports

- Attachment F transmission section
- Recipient list
- Statement that correspondence was sent

Notes and limitations

- The record proves sending, not that each recipient opened or read the message.

H-019 - Delivery-Failure Notice

Field	Information
Classification	Transmission evidence
Handling	Public

One listed council-member address generated a blocked-message or permanent-failure notice.

Notes and limitations

- Required wording: One listed council-member address generated a documented delivery failure; the available record does not show comparable delivery failures for the other listed recipients.

H-020 - Response-Status Record

Field	Information
Classification	ARAP administrative record
Handling	Public

A dated project log should document whether any response was received after July 14, 2026.

Notes and limitations

- Required fields: date checked, account or portal checked, sender, nature of response, whether seven questions were answered, whether preservation was confirmed, and link to any responsive record.
- The phrase no substantive response received should always include an as-of date.

V. Cabot Evidence Group**H-030 - Cabot ALPR Policy**

Field	Information
Classification	Policy or administrative record
Handling	Public

Supports authorized purposes, policy effective date, user responsibilities, training, alert verification, retention, supervisory structure, and broad operational language.

Supports

- Attachments A, B, and G

H-031 - Cabot Practice-and-Usage Report

Field	Information
Classification	Primary agency statistical record
Handling	Public

Supports more than seven million scans during a six-month period, positive alerts, noncorrelating matches, false or unconfirmed results, arrest-and-prosecution reporting, and scale-to-outcome comparison.

Notes and limitations

- Quote or paraphrase report terminology accurately. Do not convert arrest and prosecution into conviction.

H-032 - Cabot Supporting Statistical Spreadsheet

Field	Information
Classification	Primary agency record
Handling	Public

Supports alert categories, warrant-related records, stolen vehicles, stolen plates, sex-offender alerts, an Other category, and monthly or semiannual totals.

Notes and limitations

- The contents of Other require agency clarification before assigning a definitive meaning.

H-033 - Cabot Contract and Procurement Records

Field	Information
Classification	Contract or procurement records
Handling	Public

Supports system provider, contract dates, value, funding source, camera quantities, renewal periods, equipment or subscription structure, and procurement chronology.

VI. Jacksonville Evidence Group**H-040 - Jacksonville ALPR Policy**

Field	Information
Classification	Policy or administrative record
Handling	Public

Supports authorized use, general 150-day retention, ongoing-investigation retention, destruction at the conclusion of an investigation or criminal action, user responsibilities, and agency administration.

H-041 - Jacksonville Sharing-Network Records

Field	Information
Classification	Primary agency or vendor-derived record
Handling	Public

Supports Flock Safety and Motorola VehicleManager network participation figures, scale of available interagency connectivity, and questions regarding standing access and interstate use.

Notes and limitations

- Network participation does not establish that every listed agency accessed Jacksonville records.

H-042 - Jacksonville Administrative-Record Availability Response

Field	Information
Classification	Public-records correspondence / primary agency response

Handling	Public
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Supports records identified as available or unavailable, vendor audit records unavailable to the local end user, compliance-review categories, supervisory audit categories, and administrative oversight questions.

Notes and limitations

- Use reported unavailable or not identified in the records produced, rather than concluding that oversight did not occur.

H-043 - Jacksonville Vendor-Custody Correspondence

Field	Information
Classification	Public-records correspondence
Handling	Public

Supports the distinction between local agency records and vendor-maintained records, availability of native exports, complexity of production, agency reliance on vendor systems, and the need for contractual access to audit records.

VII. Pulaski County Evidence Group

H-050 - Pulaski County General Policy 08-018

Field	Information
Classification	Policy or administrative record
Handling	Public

Supports authorized uses, definition of an ALPR hit, independent verification requirements, training, program supervision, mobile and fixed equipment, and treatment of alerts as investigative leads or reasonable suspicion.

H-051 - Pulaski County Flock-Specific Policy

Field	Information
Classification	Policy or administrative record
Handling	Public

Supports Flock-specific operation, hot-list use, image retention or later review, missing-person and criminal-activity purposes, and policy drafting or template issues.

Notes and limitations

- A reference to another state's law should be quoted accurately and presented as a drafting concern requiring clarification, not proof that Pulaski County applied another state's law.

H-052 - Pulaski County Offense-Type or Usage Report

Field	Information
Classification	Primary agency statistical record
Handling	Public

Supports a traffic-infracton category, other offense categories, reported system use, and questions concerning whether routine traffic enforcement is authorized.

Notes and limitations

- The category does not independently establish the facts or lawfulness of any specific search.

VIII. Sherwood Search and Sharing Evidence Group**H-060 - Sherwood Search Audit**

Field	Information
Classification	Vendor-generated agency audit record
Handling	Legislative evidentiary / public with user and plate redactions

Potential fields include user, organization, search date and time, plate, search reason, case-number field, search type, filters, text prompt, networks searched, and moderation or technical fields.

Supports

- Historical-search review
- Traffic-related search findings
- Broad-filter questions
- Case-number completion review
- Mandatory search-justification recommendations

H-061 - Sherwood Network Audit

Field	Information
Classification	Vendor-generated agency audit record
Handling	Legislative evidentiary / public with redactions

Supports outside-agency searches, organizations accessing or searching available data, in-state and out-of-state activity, search purposes, network connectivity, and questions concerning standing access.

H-062 - Sherwood Transparency-Portal Agency List

Field	Information
Classification	Public transparency record
Handling	Public

Supports listed partner or connected agencies, Arkansas and out-of-state entities, scale of sharing relationships, and publicly represented network configuration.

Notes and limitations

- A listed agency should not automatically be described as having actually searched or downloaded Sherwood data without supporting audit evidence.

H-063 - Sherwood ALPR Policy

Field	Information
Classification	Policy or administrative record
Handling	Public

Supports written policy date, authorized uses, retention, sharing, user access, supervisory review, training, and public disclosure procedures if addressed.

Notes and limitations

- Where records suggest system use before adoption of the current policy, distinguish first operational date, any earlier policy, current-policy date, and whether earlier practices were governed by another written directive.

IX. ARAP Analytical Work Products**H-070 - Legislative Review Letter**

Field	Information
Classification	ARAP analytical work product
Handling	Public

Primary request to the Arkansas General Assembly asking for review of §§ 12-12-1801 through 12-12-1808.

H-071 - Attachment A: Executive Summary

Field	Information
Classification	ARAP analytical work product
Handling	Public

Summarizes major cross-jurisdiction findings and legislative significance.

H-072 - Attachment B: Jurisdiction Findings Matrix

Field	Information
Classification	ARAP analytical work product
Handling	Public

Compares Cabot, Sherwood, Jacksonville, and Pulaski County using uniform issue categories.

H-073 - Attachment C: Statutory Questions

Field	Information
Classification	ARAP analytical work product
Handling	Public

Organizes questions under each section of the ALPR Act.

H-074 - Attachment D: Sherwood Responsive-Records Summary

Field	Information
Classification	ARAP analytical work product
Handling	Public

Documents CITY-2026-112, portal production, CSV, images, follow-up, and limitations.

H-075 - Attachment E: Public Reference Summary of Sherwood ALPR Records

Field	Information
Classification	ARAP analytical work product
Handling	Legislative evidentiary; separate redacted public version recommended

Summarizes the omitted evidentiary images and spreadsheet fields and explains their cumulative informational value.

H-076 - Attachment F: Clarification and Preservation Correspondence

Field	Information
Classification	ARAP analytical work product
Handling	Public

Documents the seven questions, preservation request, transmission record, one delivery failure, and response status.

H-077 - Attachment G: Other Arkansas Jurisdictions

Field	Information
Classification	ARAP analytical work product
Handling	Public

Summarizes usage, search, retention, sharing, oversight, and vendor-custody records.

X. Recommended Master-Index Fields

Field	Purpose
Evidence ID	Permanent unique identifier
Jurisdiction	Agency, city, county, state, vendor, or court
Source type	Policy, audit, contract, email, image, statute, etc.
Title	Exact source title
Original filename	Filename exactly as received
Working filename	Standardized project filename
Date created	Date shown on the source
Date received	Date obtained by ARAP
Request number	FOIA or portal reference
Reporting period	Period covered by the record
Custodian or sender	Producing office
Description	Neutral summary
Key propositions supported	Claims the item may substantiate
Attachment references	A-H sections relying on it
Public status	Public, redacted, evidentiary, restricted
Personal or sensitive data	Plate, location, email, credentials, etc.
Redaction status	None, required, completed
Verification status	Verified, partially verified, unresolved
Superseded status	Current, draft, superseded
SHA-256 hash	File-integrity value
Repository path	Local folder location
Public-reference path	Redacted copy location
Notes and limitations	Important cautions
Last reviewed	Most recent validation date
Reviewer	Person conducting validation

XI. File-Naming Standard

Recommended pattern:

ARAP-[JURISDICTION]-[CATEGORY]-[YYYYMMDD]-[SHORT-DESCRIPTION]-[EVIDENCE-ID].
[EXT]

Examples

- ARAP-SHERWOOD-FOIA-20260630-CITY-2026-112-H010.pdf
- ARAP-SHERWOOD-ALPR-20260601-20260628-SEARCH-RESULTS-H012.csv
- ARAP-CABOT-REPORT-2025H1-PRACTICE-USAGE-H031.pdf
- ARAP-JACKSONVILLE-POLICY-ALPR-H040.pdf

Rules

- Preserve the original filename in the workbook;
- Do not overwrite original source files;
- Use a separate standardized working copy;
- Include dates in YYYYMMDD format;
- Avoid spaces in repository filenames;
- Identify redacted copies with _PUBLIC-REDACTED;
- Identify evidentiary copies with _EVIDENTIARY;
- Identify drafts with _DRAFT; and
- Identify superseded files in the workbook rather than deleting them.

XII. Integrity and Preservation Procedures

146. Preserve the original file unchanged;
147. Create a working copy;
148. Calculate a SHA-256 hash;
149. Record the download or receipt date;
150. Preserve the producing email or portal page;
151. Save a PDF or screenshot of online records;
152. Record the public URL or portal reference where applicable;
153. Maintain a chain-of-custody or handling log for important evidence;
154. Keep redacted public copies separate from originals;
155. Back up the repository in at least two locations;
156. Maintain a revision history; and
157. Never replace a source file with an edited or annotated copy.

XIII. Citation Standard for the Legislative Packet

Document citation

Sherwood Police Department, Request CITY-2026-112, request details and responsive-file listing, submitted June 30, 2026, completed July 2026, ARAP Evidence H-010 to H-011.

Spreadsheet citation

Flock Safety Search Results CSV produced by the Sherwood Police Department in response to CITY-2026-112, 80 data rows, ARAP Evidence H-012.

Image citation

Sherwood Police Department/Flock Safety responsive image, [camera name], [capture date and time], ARAP Evidence H-014-[subitem].

Correspondence citation

Request for Clarification and Preservation of Records concerning CITY-2026-112, July 14, 2026, ARAP Evidence H-017.

Agency policy citation

[Agency], [policy number and title], effective [date], ARAP Evidence [ID], at [page or section].

Analytical-work-product citation

ARAP Attachment [letter], [section], derived from ARAP Evidence [IDs].

XIV. Evidentiary and Editorial Limitations

158. A record's inclusion in the index does not mean ARAP endorses every statement contained in it.
159. Agency-created records may contain errors, omissions, or inconsistent terminology.
160. Vendor-generated records may contain automated classifications that require verification.
161. A portal listing does not necessarily describe the internal legal review preceding release.
162. Network membership does not establish actual access by every member.
163. A search-reason entry does not independently prove whether the stated reason was accurate.
164. An unavailable record does not prove that the activity did not occur.
165. Silence or lack of response does not prove intent, bad faith, or illegality.
166. Draft correspondence should not be confused with the authenticated sent version.
167. Public copies should not unnecessarily reproduce identifiable vehicle-location information.
168. Numerical comparisons should account for different reporting periods and definitions.
169. Legal interpretations are presented for legislative and professional review rather than declared conclusively by ARAP.

XV. Publication Checklist

- Confirm every cited file is present in the repository;
- Verify all exhibit IDs;
- Resolve duplicate or inconsistent filenames;
- Identify the authenticated version of each letter;
- Insert an as-of date for unresolved response status;
- Confirm Cabot reporting-period totals;

- Confirm Jacksonville network figures and source wording;
- Confirm Pulaski County policy dates and citations;
- Confirm Sherwood audit scope and traffic-related findings;
- Redact public copies where required;
- Calculate or verify SHA-256 hashes;
- Update the evidence-management workbook;
- Test every document link or QR code;
- Produce a final PDF packet;
- Preserve the final release package; and
- Record the packet version and publication date.

Preliminary Conclusion

The Source and Evidence Index is intended to make the legislative packet independently reviewable.

It connects statutory questions and policy recommendations to identifiable records while preserving the distinction between what the records directly establish, what may reasonably be inferred, what remains unresolved, what an agency may later clarify, and what the General Assembly must ultimately decide as a matter of law and public policy.

Editorial standard: No conclusion without a citation. Records are described neutrally, limitations are disclosed, and public distribution should not unnecessarily reproduce sensitive or identifiable vehicle-location information.