
From: Yadi <[REDACTED]>
Sent: Monday, July 13, 2026 4:26 PM
To: Police Commission
Subject: Public Comment - Los Angeles Police Commission Meeting - 07/13/2026
Attachments: Public Comment - Los Angeles Police Commission 07-13-26 Drone.pdf

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi,

Please find attached my public comment for the July 13, 2026 Los Angeles Police Commission meeting, agenda item 5.D. Drone [BPC #26-171].

Thanks,

Yadi
(Attachments: 1)

5.D. Drones

In February 2026, the UC Berkeley Criminal Law & Justice Center presented the report “Drone as First Responder, Policy Review & Recommendations” to the Berkeley Police Accountability Board. The report is attached.

Yadi

Los Angeles Police Commission

July 13, 2026

5.D. Drones [BPC #26-171]

DFR???

***(DRONE AS FIRST
RESPONDER)***

NO

NO

NO



Drone as First Responder

Policy Review & Recommendations

Berkeley Police Accountability Board · February 2026

PRESENTED BY Imaan Maftah · CLJC

1. Background & Objectives

2. Methodology

3. Empirical Evidence

4. Policy Gaps

5. Constitutional Risk

6. Recommendations

Background & Objectives

Background

The Berkeley Police Department has proposed acquiring a Drone as First Responder (DFR) program. In response to this proposal, the Police Accountability Board (PAB) requested that the UC Berkeley Criminal Law & Justice Center conduct an independent policy review.

Objectives

This presentation seeks to evaluate the Berkeley Police Department's proposed Drones as First Responder use policies under Policy 611 and assesses the preliminary analytical framework developed by the Office of the Director of Police Accountability and shared with CLJC in an October 2025 memorandum:

- Empirical Verification
- Policy and Civil-Liberties Analysis
- Transparency and Oversight Framework
- Cost and Operational Modeling
- Equity and Community Impact
- Comparative Benchmarking



Methodology

Empirical Effectiveness Analysis

Empirical Effectiveness Analysis was conducted to examine claims advanced by technology vendors and police departments, including performance assertions and data privacy guarantees, by drawing on publicly available crime statistics, drone deployment data, comparative jurisdictional analysis, and peer-reviewed literature

Policy Analysis

Policy Analysis was undertaken to evaluate BPD's proposed use policies, oversight structures, and documented cost frameworks through a comparative review of peer jurisdictions. The goal was to identify essential safeguards and enforceable provisions that must be in place should the City choose to move forward with approving a Drone as First Responder program.

Legal and Constitutional Review

Legal and Constitutional review focused on Fourth Amendment search limitations, First Amendment protected-activities, California privacy law (Art. I, § 1), AB 481 requirements, and CalECPA electronic surveillance provisions were undertaken to evaluate legal risk, case law, statutory interpretation, and municipal policy precedent. See Appendix A for detailed legal framework.

Limitations: The information in this presentation draws on publicly available data from peer jurisdictions, peer-reviewed scholarship and secondary analyses of department flight logs, and findings should be interpreted accordingly. Clearance rate comparisons are descriptive rather than causal. The observed divergence between high- and low-drone deployment categories may reflect differences in crime type, reporting patterns, prosecutorial standards, or concurrent policy interventions, and cannot be attributed to drone deployment alone without controlled study design and case-level outcome data.

CLJC Recommends Against DFR Procurement

X

NO EMPIRICAL BASIS

Claims of staffing efficiencies, de-escalation and safety are not supported by peer-jurisdiction evidence and peer-reviewed literature.

SFPD data shows that crime categories with high drone deployment underperformed by 85.7pp compared to the control group.

!

CONSTITUTIONAL RISK

Potential for significant 1st and 4th Amendment exposure. Mission creep documented in many peer jurisdictions.

Policy language alone insufficient—restrictions must be built into procurement.

?

CRITICAL POLICY GAPS

In December, 2025, the FCC added all foreign-produced drones to its Covered List under the FY2025 NDAA, creating supply chain and lifecycle uncertainty for BPD's proposed DJI fleet.

BPD's Impact Statement contains no reference to the FCC ruling, omits Flock sanctuary law exposure, and fails to project LTE infrastructure, data storage, fleet replacement, or the operational risks the Covered List ruling creates for long-term hardware commitments. Fiscal disclosure is materially incomplete.

BPD Claims: Limits of the Available Evidence Thus Far

BPD / BPA Claim	Evidence Status	Key Finding
Faster Response Times	✓ SUPPORTED	Drones arrive 3-5 min faster. Chula Vista: 74% arrive before ground units.
Enhanced Situational Awareness	⚠ MODERATE	Useful in high-risk scenarios. Limited to specific emergencies; raises routine privacy risk.
Improved Crime Clearance	✗ NO EVIDENCE	SFPD quasi-experiment: High-drone crimes improved 10pp post-deployment vs. 67.3pp for control group.
Crime/Violence Reduction	✗ NO EVIDENCE	No peer-reviewed study demonstrates causal link between drone use & reduced crime rates.
De-escalation & Use of Force	⚠ ANECDOTAL ONLY	Single-incident examples. No empirical data. Denver STAR program shows strong outcomes.
Cost Effectiveness	⚠ UNVERIFIED	No independent audit. Chula Vista's salary-absorption model collapsed. BPD's model mirrors it.

SFPD Drone Deployment vs. Crime Clearance Rates (2023–2025)

HIGH DRONE DEPLOYMENT (Treatment Group)			
Crime	Pre-Drone 23→24	Post-Drone 24→25	Acceleration
Robbery	+12.1%	+1.2%	-10.9pp
Assault	+264.0%	-1.1%	-265.1pp
Burglary	+11.1%	+30.0%	+18.9pp
Mean	+95.7%	+10.0%	-85.7pp

LOW/NO DRONE DEPLOYMENT (Control Group)			
Crime	Pre-Drone 23→24	Post-Drone 24→25	Acceleration
Rape	+17.2%	+30.6%	+13.4pp
HIT-Inv Srv	+19.4%	+31.0%	+11.6pp
Arson	-14.8%	+198.9%	+213.7pp
Larceny	+128.6%	+8.7%	-119.8pp
Mean	+37.6%	+67.3%	+29.7pp

KEY FINDING: High-drone crime categories showed mean acceleration of -85.7pp vs. +29.7pp for low-drone categories — a 115.4pp gap. This is descriptive, not causal, but warrants further investigation before deployment.

What BPD's Impact Statement Omits

✓ DISCLOSED COSTS	✗ NOT DISCLOSED / OMITTED
Initial Hardware (Avata 2 + Matrice 4T) \$44,500	Connectivity / LTE Infrastructure Not quantified
DFR Lease — Year 1 \$100,000	Axon Evidence.com Data Storage Not accounted/omitted
Dock Installation \$15,000	Fleet Replacement (Year 3–4) Not projected
Training (12 pilots) \$72,000	NDAA/FCC Compliance Transition (3 of 4 DJI models added to FCC Covered List Dec 2025) Not quantified
Annual DFR Lease + Radar (ongoing) \$277,000/yr	Sanctuary Law Exposure via Flock Platform Not assessed

NDAA Compliance Changes: Three of BPD's four proposed drone models (DJI Avata 2, Matrice 4T, Matrice 4TD) were added to the FCC Covered List in December 2025. BPD's Impact Statement fails to reference this ruling. Within the disclosed 3-year hardware lifespan, these units may face operational and fiscal restrictions requiring premature NDAA-compliant replacement at significantly higher cost.

Sanctuary Law Risk: ACLU investigations document Flock's default agreements may permit data sharing even when agencies opt out. Oakland PD — prohibited by CA law from sharing with federal agencies — allowed federal-marked data access through Flock in 2025. BPD's proposal does not address vendor data access, third-party access, footage storage location, or warrant-compelled disclosure protocols.

Comparable Program: Chula Vista's salary-absorption model failed — City Council approved \$1.5M annual investment. BPD's proposed model mirrors the same structure which may prove to be unsustainable in the long-term.

Policy 611 Strengths & Critical Remaining Gaps

✓ POLICY 611 STRENGTHS (Exceeds Peer Jurisdictions)

Narrow Scope

11 enumerated emergency uses only; no BPD personnel operate drones

City Manager Approval Chain

Watch Commander → Chief → City Manager required for each use

60-Day Data Purge

Non-evidentiary footage deleted within 60 days

14-Day Transparency Portal

Each deployment published within 14 days

Explicit Prohibitions

Race, religion, sex, gender identity, economic status, disability targeting banned

✗ CRITICAL GAPS — Must Be Addressed Before Council Vote

No Outcome Metrics

Policy 611 does not contain effectiveness benchmarks. No success thresholds or pilot evaluation protocol.

No Vendor Data Controls

Policy 709 does not specify vendor data access restrictions, Flock API sharing rules, or federal agency prohibitions.

No Audio Prohibition

No explicit ban on microphone or audio activation. Could expose the department to suppression risk and potential civil liability under PC §637.2

No Sanctuary Compliance

BMC 13.90 protections not embedded in vendor contract requirements.

No Equity Safeguards

No per-census-tract deployment caps, no demographic flight logging, no disparate impact review.

Mission Creep Precedent: SF flew 78% of drone missions for property crimes (not emergencies) and flew drones at public events (Pride, Dolores Hill Bomb skateboarding event). Las Vegas plans to expand to 24/7 operations in 2026. Policy language alone has proven insufficient.

Why These Risks Are Not Hypothetical

1ST 1st AMENDMENT

2017: Alameda & Contra Costa Sheriff's flew drones over peaceful protests in Berkeley and Richmond

Departments have classified protest surveillance as 'public safety' to circumvent warrant requirements and public record requests

Berkeley must categorically prohibit deployment at assemblies, not merely restrict it

4TH 4th AMENDMENT

Kyllo v. United States: advanced sensors (thermal) into homes = search requiring warrant

Carpenter v. United States: sustained tracking of movements = unconstitutional without warrant

Policy 611's vague authorization language may create litigation risk

EQ RACIAL EQUITY

SFPD: Drone flights concentrated in Tenderloin, Mission, SoMa, Bayview — highest minority & low-income areas

Strong spatial overlap between racialized neighborhoods and drone deployments

Berkeley lacks any equity monitoring or per-tract deployment cap in proposed policy

Addressing the PAB's Five Key Focus Areas

1

Empirical Verification

Unsubstantiated

Clearance improvement, safety and staffing efficiency claims lack peer-reviewed support. SFPD quasi-experiment trends negative for high-deployment crime categories.

2

Policy & Civil Liberties

Major Gaps

No audio prohibition, no Flock vendor controls, no sanctuary protections embedded in Policy 709. Protections must be codified in policy.

3

Transparency & Oversight

Partially Addressed

Policy 611 14-day portal and 60-day purge exceed peer standards. But no case-level data reporting framework, no demographic logging, no independent audit mechanism.

4

Cost & Operational Modeling

Materially Incomplete

BPD discloses ~\$277K/yr but omits cellular/LTE infrastructure, Axon storage, fleet replacement, and NDAA compliance costs. Independent CBA required before Council vote.

5

Equity & Community Impact

Not Addressed

No per-census-tract deployment caps. No demographic flight logging. SFPD data shows predictable disparate impact pattern Berkeley should anticipate and prevent.

CLJC's Staged Recommendation for Council Consideration

PRIMARY: Recommend the City Council REJECT BPD's DFR proposal in its current form. The primary public safety justification is not supported by evidence. Constitutional and fiscal risks are unmitigated. Current and projected fiscal models remain incomplete.

CATEGORICAL PROHIBITION (regardless of any other decision): Categorically prohibit interior drone procurement (drones capable of entering enclosed structures) under any circumstances.

IF COUNCIL DECLINES TO REJECT — Condition Authorization on 3 Mandatory Pre-Deployment Stages:

STAGE 1

Mandatory Risk Assessment

- Independent (non-vendor) constitutional exposure analysis
- Disparate impact modeling using SFPD deployment patterns
- Full lifecycle cost disclosure including NDAA/FCC compliance costs

STAGE 2

Bounded 12-Month Pilot

- Tier 1 emergencies ONLY (violent crime, fires, SAR) — no property crime
- City-controlled data storage; zero vendor access; third-party access controls; automatic sunset
- Per-tract deployment caps + demographic logging required

STAGE 3

Pre-Defined Success Metrics

- Council must adopt binding thresholds BY ORDINANCE before pilot launches
- Metrics: response time, warrant compliance, equity distribution, cost vs. alternatives
- Data architecture built into procurement requirements from day one

Summary: What the PAB Should Request From BPD

- 01 Independent cost-benefit analysis accounting for NDAA/FCC compliance costs, LTE infrastructure, and Flock sanctuary law exposure
- 02 Supplemental disclosure on FCC Covered List ruling for DJI Avata 2, Matrice 4T, and Matrice 4TD — with replacement cost estimates for NDAA-compliant alternatives
- 03 Vendor contract provisions explicitly prohibiting data access by Flock/Axon, with termination clauses tied to sanctuary law violations
- 04 Binding success metrics adopted by ordinance BEFORE any pilot authorization, with data architecture requirements built into procurement specs
- 05 Per-census-tract deployment caps and mandatory demographic flight logging to enable disparate impact monitoring under Berkeley's anti-discrimination policies

Works Cited

Berkeley Police Department. Policy 611: Unmanned Aircraft Systems. City of Berkeley. [Primary policy document — cited directly from text provided.]

Berkeley Police Department. Policy 709: Automated License Plate Readers. City of Berkeley. [Primary policy document.]

FCC Public Safety and Homeland Security Bureau. Covered List Update: Foreign-Produced UAS and UAS Critical Components. Federal Communications Commission, December 22, 2025.

FY2025 National Defense Authorization Act, Section 1709. Pub. L. No. 118-31 (2024).

California Penal Code §§ 632, 637.2. California Legislature

SF Gazetteer. "SFPD Quietly Deployed Drones at Outside Lands, Pride, and the Dolores Hill Bomb." sf.gazetteer.co, 2024. <https://sf.gazetteer.co/sfpd-quietly-deployed-drones-at-outside-lands-pride-and-the-dolores-hill-bomb>

San Francisco Police Department. "Real-Time Investigation Center." sanfranciscopolice.org. <https://www.sanfranciscopolice.org/news/san-francisco-police-department-real-time-investigation>

San Francisco Standard. "SFPD Let Georgia, Texas Cops Illegally Search City Surveillance Data on Behalf of ICE." sfstandard.com, September 8, 2025. <https://sfstandard.com/2025/09/08/sfpd-flock-alpr-ice-data-sharing/>

CBS 8 San Diego. "Chula Vista Model for Police Use of Drones Amid Privacy Concerns." cbs8.com, 2024. <https://www.cbs8.com/article/news/investigations/police-drones-chula-vista/509-31530372-818d-4f40-bafb-35f086249bee>

FOX5 Vegas. "Gateways to the Sky: Las Vegas Police Announce Next Phase of Drone Program." fox5vegas.com, September 11, 2025. <https://www.fox5vegas.com/2025/09/11/gateways-sky-las-vegas-police-announce-next-phase-drone-program/>

From: Yadi <[REDACTED]>
Sent: Monday, July 13, 2026 4:18 PM
To: Police Commission
Subject: Public Comment - Los Angeles Police Commission Meeting - 07/13/2026
Attachments: Public Comment - Los Angeles Police Commission 07-13-26 ALPR .pdf

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi,

Please find attached my public comment for the July 13, 2026 Los Angeles Police Commission meeting, agenda item 5.B. Office of Inspector General Report on Flock Automated License Plate Readers (ALPR) [BPC #26-184].

Thanks,

Yadi
(Attachments: 1)

5.B. Office of Inspector General Report – Flock ALPR

Thank you to the Los Angeles Office of Inspector General for providing a rather comprehensive report about LAPD's Flock ALPR, including factual background such as the vendor contract, and camera details. It is very informative for the public to understand LAPD and Flock's relationship and to weigh in on Flock as a vendor and ALPR as a technology.

I support the recommendation to discontinue, end, and to immediately remove Flock and other stationary ALPR cameras.

As a survivor of the LA fires, I am personally disgusted that Flock ALPR cameras were quietly installed in devastated regions like Palisades and Altadena under the guise of goodwill and safety.

Stationary ALPR is warrantless mass surveillance and infringes on our civil liberties, is undemocratic, and violates our privacy.

This should be a reckoning that the people don't want to live in a surveillance state. What we want is housing and healthcare. That's public security.

Yadi

Los Angeles Police Commission

July 14, 2026

5.B. Office of Inspector General Report – Flock ALPR

From: Century Glen <[REDACTED]>
Sent: Monday, July 13, 2026 3:45 PM
To: Police Commission
Subject: Item 5A -Automated License Plate Recognition (ALPR) & Flock Safety MOU

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Dear Commissioners,

Our community has demonstrated its commitment to public safety by raising private funds to lease Automated License Plate Reader technology via the Police Foundation. Today, many of those investments remain on hold because uncertainty surrounding LAPD's ability to move forward has delayed implementation.

Our HOA spent months evaluating public safety options before deciding to invest in ALPR technology. We listened to residents, reviewed local crime trends, and carefully weighed the benefits and concerns. This was not a decision we made lightly.

Our goal is straightforward: to help deter crime and provide law enforcement with valuable investigative leads when crimes occur. We also recognize the importance of protecting privacy. That is why we support clear policies, strong oversight, and responsible use of this technology, and why we selected Flock Safety as our vendor.

We respectfully ask the Commission to approve the MOU and allow LAPD to continue partnering with communities that have chosen to invest in this proven public safety tool, while ensuring appropriate safeguards, transparency, and accountability remain in place.

Thank you,

Century Glen HOA / Tract 7260

www.CenturyGlen.org

From: Carey J Bennett <[REDACTED]>
Sent: Monday, July 13, 2026 10:49 AM
To: Police Commission; cityatty.help@lacity.org; communityrelationsoig@lacity.org
Subject: Public Comment: Terminate All Partnerships With Flock Safety

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

To the Los Angeles Board of Police Commissioners:

I am deeply concerned and reject the Los Angeles Police Department's use of the Flock "Safety" ALPR system to surveil and stalk Angelenos.

Flock is a company that specializes in Automatic License Plate Readers (ALPRs) and other surveillance technology. But Flock does not just capture license plate data. Flock's ALPRs capture people's movement, location, date, time, images of drivers and passengers, dog walkers, and more. Flock is an expansion of the mass surveillance state, a technology that accelerates the mass deportation pipeline, criminalizes all Angelenos across the city including Black folks, immigrants, trans folks, youth, abortion seekers, sex workers and more. Flock weaponizes our movement data to expand the presumption of guilt.

I know Flock is one of the many enablers of the state's ability to monitor and criminalize marginalized communities. Automatic License Plate Readers cannot be reformed with better privacy policies or data-sharing guardrails. They have to be abolished.

ALPR cameras and surveillance technology do not keep us safe. Angelenos need investment in housing and services that meet our basic needs, not more surveillance technology that police and criminalize us.

I demand that the Board of Police Commissioners instruct LAPD to terminate all partnerships with Flock with immediate effect. I demand that the Los Angeles Police Department terminate all partnerships with Flock "Safety." I demand that LAPD, the Board of Police Commissioners, the LA City Council, and the Mayor do not enter into any new partnerships with other ALPR companies (Axon, Vigilant Solutions, etc.).

Sincerely,

Carey Bennett

Los Feliz 90027

Sent from [Proton Mail](#) for Android.

From: Jamie Cunningham <[REDACTED]>
Sent: Friday, July 10, 2026 3:32 PM
To: Police Commission
Subject: Public comment: Justice for Jameson/ NRF027/ LAPD OIS-A

ATTENTION: This email originated outside of LAPD. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

My name is Jamie Cunningham and I would like this to be entered into public record. I am requesting immediate release of the full office responding list, CAD logs, radio traffic, the offending officer's full name and serial number, 911 audio, incident reports, and force investigation division records related to NRF027-26 the LAPD officer involved pet canine shooting that killed Jameson in Canoga Park.