



SAVAGE
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LLP

Michael P. Robinson

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Law and Business Advisors

November 25, 2025

MuckRock News

Attention: Gareth Evans

VIA EMAIL ONLY: 197647-26259303@requests.muckrock.com

Dear Mr. Evans:

This office is in receipt of your Access to Public Records Act (“APRA”) request received by the City of Pawtucket (“City”) on November 17, 2025 (“APRA Request”) wherein you are seeking, inter alia, “records related to the Pawtucket Police Department’s Flock Safety and other automatic license plate readers (ALPRs)... .” Attached hereto are copies of the APRA Request.

As you may be aware, under the APRA, the City is authorized to charge a reasonable amount for the process of searching, retrieving, and redacting requested documents. *See* R.I. Gen. Laws § 38-2-4(b) and *DARE v. Gannon*, 819 A.2d 651, 661 (R.I. 2003) (“[T]he costs of redaction should be borne by the requesting party because it is part of the process of retrieving and producing the requested documents.”). Hourly costs for a search and retrieval shall not exceed fifteen dollars (\$15.00) per hour and no costs shall be charged for the first hour of a search or retrieval.

Please be advised that the City has informed me that there are approximately twelve (12) documents consisting of ninety-four (94) pages which may be responsive to your APRA Request.

Based on the foregoing, we anticipate it will take approximately six point three (6.3) hours to search for and retrieve the potentially responsive documents to your APRA Request, and to review and redact as appropriate. As a result, the City requires advance payment in the amount of \$79.50 (\$94.50 -\$15.00 as first hour is free) in order to perform these tasks. Please note that the City’s time to respond to this APRA Request is tolled pending the receipt of the aforementioned payment. *See Owens v. Rhode Island Department of Health*, PR 20-39 (noting that the timeframe to respond to an APRA request is “subject to tolling if awaiting prepayment”).

If you do not respond to this letter within thirty (30) days, your request will be considered closed.

In order to move forward with your APRA Request, **please remit payment payable to the City of Pawtucket**, in the amount of \$79.50 and reference your APRA Request and this correspondence. Please mail said payment to Savage Law Partners, LLP, Attention: Allison Y. Charette, Paralegal, 564 South Water Street, Providence, RI 02903. Upon receipt of the funds, we will commence the process necessary to respond to your APRA Request. If the actual cost is more than or less than the estimate provided, we will notify you of such difference and as appropriate, either return funds or request that the additional amount be paid to the City of Pawtucket.

Notwithstanding the estimated costs identified herein, you may elect to withdraw your APRA Request and submit a new, more refined request to the City, and we will respond to such new request pursuant to the provisions of APRA.

As per R.I. Gen. Laws § 38-2-8, if you believe that the City has not been responsive to your request, you may appeal to Mayor Donald R. Grebien, 137 Roosevelt Avenue, Pawtucket, RI 02860. You may also file a complaint with the Department of Attorney General, 150 South Main Street, Providence, RI 02903, or the Providence County Superior Court. Additional information concerning the Access to Public Records Act is available through the Attorney General's website at www.riag.ri.gov.

Sincerely,

Michael P. Robinson

Michael P. Robinson, Esquire

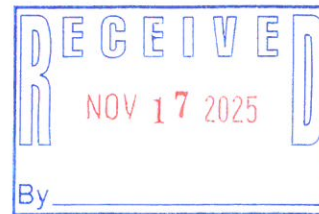
CC: Frank Milos, Jr. Esq.
Nicole Farias



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Mayor's Office
APRA Office
2nd Floor, Room 200
137 Roosevelt Avenue
Pawtucket, RI 02860



November 17, 2025

This request was originally submitted via email to apires@pawtucketri.com (error). It was never acknowledged. Due to issues with the original communication method, we are now directing this request to you.
To Whom It May Concern:

Pursuant to the Rhode Island Access to Public Records Act, I hereby request the following records:

I respectfully request access to the following records related to the Pawtucket Police Department's Flock Safety and other automatic license plate readers (ALPRs), specifically:

1. FLOCK SAFETY INFORMATION

1.1. CONTRACTS and AGREEMENTS

1.1.a. All contracts, licenses, MOUs, MOAs, data agreements, letters of intent, Statement of Work documents, Scope of Work documents, purchase orders, and other agreement documents with Flock Safety ('Flock', and/or 'Flock Group, Inc.') that are currently or were active any time between 1/1/2020 and the date this request is processed (inclusive of those dates). This includes documentation related to the acquisition, leasing, and/or use of Flock Safety cameras or services, including associated data platforms and analytics tools.

1.2. GUIDING DOCUMENTATION and POLICIES

1.2.a. All policies, memorandums of understanding, and other guidance materials generated by the Department and/or any entity operating on its behalf regarding the acquisition and use of any data or services provided by Flock Safety ('Flock', and/or 'Flock Group, Inc.') and any representative thereof or any subdivision thereof. Responsive materials include, but are not limited to, any data-sharing agreements, retention policies, training materials, or other guidance materials.

1.2.b. All policies, records, emails, or data related to the sharing of passwords or otherwise offering access (e.g., performing searches informally by non-official request) with local, regional, or federal task forces or agents.

1.2.c. All non-email records detailing policies, SOPs, directives, training materials, and other guidance materials on when and how ALPR alerts may be utilized to initiate or justify traffic stops or detentions, requirements for independent corroboration or verification before enforcement action, documentation and/or reporting expectations for ALPR-related encounters, how hits are verified and how mismatches or false positives are handled, information on data retention and personnel access restrictions, and any policy memos explaining change history within any related documents.

1.2.d. All policies, SOPs, or other guidance materials generated by the agency detailing the required frequency of Organization Audits, Network Audits, and other audits of the Flock system and its use by personnel.

2. FLOCK SPECIFIC DATA

2.1. Organization Audit in Flock.

2.1.a. Flock-generated export report: This report should include data logged from the period of 1/1/2025, to the date this request is processed (inclusive of those dates). Per Flock's documentation, the Organization Audit is available within the Insights tab and is defined as searches done within the Department. Please include, at a minimum, the following fields: Name, Total Networks Searched, Time Frame, License Plate, Case #, Filters, Reason, and Search Date/Time.

2.2. Network Audit in Flock.

2.2.a. Flock-generated export report: This report should include data logged from the period of 1/1/2025, to the date this request is processed (inclusive of those dates). Per Flock's documentation, the Network Audit is available within the Insights tab and is defined as searches of the Department's Flock network by any agency in the Flock System. Please include, at a minimum, the following fields: Name, Org Name, Total Networks Searched, Total Devices Searched, Time Frame, License Plate, Case #, Filters, Reason, and Search Date/Time.

2.3. List of Network Share Settings in Flock:

2.3.a. Data from Flock Platform: The names of agencies and organizations with which the Department shares ALPR data, also referred to as "Networks that I'm sharing."

2.3.b. Data from Flock Platform: The names of agencies and organizations from which the Department receives ALPR data, also referred to as "Flock networks shared with me."

2.3.c. Data from Flock Platform: The names of agencies and organizations with which the Department shares "hotlist" information, also referred to as "Hotlists that I'm sharing."

2.3.d. Data from Flock Platform: The names of agencies and organizations from which the Department receives "hotlist" information, also referred to as "Hotlists shared with me."

2.4. Hotlist Information in Flock.

2.4.a. Flock-generated export report: An exported log of hot list actions (typically "create," "update," and delete") in the Department's Flock Safety system spanning the last 6 months from the date this request is processed. This log should include fields detailing, at minimum, a timestamp, user performing the action, the event type (e.g., 'create', 'update', 'delete'), entity type, and entity details (For Entity Details, please include at minimum the fields 'hotlist name', 'reason', 'case', and 'expiry'). An example of this document may be viewed here:

https://cdn.muckrock.com/foia_files/2025/08/23/CPRA_C001586_Hotlist.xlsx

2.4.b. Documentation regarding which external Hotlists the Flock system is configured to utilize.

2.5. Information on Users with Access to the Flock System.

2.5.a. Documentation indicating users with access to the agency's Flock deployment and the access that is enabled/disabled for each user account. The report should include: User Id, Name, Role, Identity Provider, Last login, User Mgmt, Search, Device Mgmt, and Hotlist Tool.

3. GENERAL ALPR QUESTIONS

3.1. ALPR "Hot Lists"

3.1.a. A description of all "hot lists" or "custom hot lists" currently maintained for use in Automated License Plate Reader (ALPR) systems.

3.1.b. Any policies, agreements, or data-sharing documents identifying external data sources used to populate those lists (e.g., DMV data on suspended/revoked licenses, NCIC, CLETS, Amber Alerts, stolen vehicle databases).

3.1.c. Any documentation offering guidance or specifying the criteria under which plates are added or removed from hot lists.

3.1.d. Any policies, SOPs, and/or software specification indicating how vehicles without plates or with plates that are unable to be read via automated software trigger alerts within system(s) utilized by the department.

3.2. ALPR Installation Locations.

3.2.a. Documentation detailing the location of all Flock camera and other non-mobile ALPR-capable recording device installations, both city-owned and non-city owned, that are located in Pawtucket with which the Department has access to (including via indirect access, such as the ability to query or otherwise view logged data or analytics). For each device, please include the following details: location of installation (provided with enough detail to make the location clear, either as streets at an intersection or geographic coordinates),

street of which camera's field of view covers, and direction in which camera's field of view covers (using cardinal directions e.g., 'Eastbound'), device make and model, and associated owner(s) and/or third-party service provider name(s), if applicable (e.g., Flock).

3.2.b. If available, documentation including but not limited to memos or similar which indicate the selection criteria that determined placement of installed ALPR devices.

GENERAL NOTES:

***Please provide all documents in their original electronic, machine readable format. For example, please provide files as they are natively output by Flock's and other systems' export tools (e.g., as .csv) where applicable. Otherwise, please utilize .pdf, .csv, .xls, .xlsx files as appropriate.

***If necessary, please forward this request or portions thereof to the appropriate custodian(s) (e.g., policy/training/legal custodians).

***If this request is denied in whole or in part, please justify all deletions and/or redactions by reference to the specific exemptions of the Access to Public Records Act. Additionally, if any documents are withheld, please inform me of the existence of such documents and the specific reasons for their being withheld.

The requested documents will be made available to the general public, and this request is not being made for commercial purposes.

In the event that there are fees, I would be grateful if you would inform me of the total charges in advance of fulfilling my request. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not.

Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving your response to this request within 10 business days, as the statute requires.

Sincerely,

Gareth Evans

View request history, upload responsive documents, and report problems here:
<https://www.muckrock.com/respond/2131317/>

Filed via MuckRock.com

E-mail (Preferred): 197647-26259303@requests.muckrock.com

PLEASE NOTE OUR NEW ADDRESS

For mailed responses, please address (see note):

MuckRock News

DEPT MR 197647

263 Huntington Ave

Boston, MA 02115

PLEASE NOTE: This request is not filed by a MuckRock staff member, but is being sent through MuckRock by the above in order to better track, share, and manage public records requests. Also note that improperly addressed (i.e., with the requester's name rather than "MuckRock News" and the department number) requests might be returned as undeliverable.

