

STATE AND LOCAL POLICIES

I. INTRODUCTION

This year, the Board examines its continuing mission to reduce or eliminate racial and identity profiling through a past, present, and future lens. Beginning with the past, Section II assesses whether the adoption of RIPA recommendations by law enforcement agencies has resulted in changes to the data they report under RIPA. In particular, the Board looks at whether there were any changes in racial and identity group disparities in the reporting agencies' stop data, looking at key metrics, such as stops, requests for searches, searches, and length of detention. Examining the Board's past recommendations alongside the reported data can help track law enforcement progress and identity strategies that support the reduction in racial and identity profiling. *[Note: The scope of this analysis is still under development.]*

Turning to the present, the Board analyzes the impact of recent immigration enforcement actions by federal agents on state and local policing. Section III provides a brief overview of *Noem v. Vasquez Perdomo*, where Supreme Court Justice Kavanaugh opined¹ that an immigration agent can consider an individual's apparent race or ethnicity, among other things, to determine whether to stop the individual and ask about their immigration status — the so-called “Kavanaugh stop.”² This section also discusses how RIPA prohibits state and local law enforcement officers from racial and identity profiling using Kavanaugh stops and examines other state laws like the California Values Act. Understanding the landscape of immigration enforcement operations allows the Board to evaluate how participation in joint task forces impacts state and local law enforcement agencies. In Section IV, the Board builds off last year's analysis of stops of individuals with perceived limited English fluency by looking at perceived lack of English fluency, perceived race or ethnicity, and actions taken during the stop, to determine whether there are perceived racial or identity groups that are treated disproportionately, and whether they are adversely affected by their perceived lack of English fluency. Because California is home to approximately 40 million people, of whom nearly 20 percent are considered limited English proficient,³ this analysis by the Board is particularly important. *[Note: Consistent with Board comments, this analysis is subject to DOJ capacity.]*

Looking to the future, Section V expands upon the Board's analysis of law enforcement's use of emergent technologies in the 2026 RIPA Report, and how the use of certain technologies by law enforcement, as well as the use of other technologies for studying law enforcement, might contribute to — or help to reduce — racial and identity profiling and disparities. Finally, Section VI provides recommendations based on research and data relating to policies that, if adopted, could reduce or eliminate racial and identity profiling or disparities going forward.

¹ It should be noted that the case reached the Supreme Court via the emergency docket, where the Supreme Court only decided whether to temporarily block a district court's injunction, and Justice Kavanaugh opinion was a concurrence to that decision. (See *Vasquez Perdomo v. Noem* (C.D.Cal. July 11, 2025), No. 2:25-cv-05605-MEMF-SP). Further, as such, the opinion is his rationale for the Supreme Court's order, not the Court's decision on the merits of the underlying lawsuit.

² “Kavanaugh stop,” Legal Information Institute, Cornell Law School, (May 2026) <<https://tinyurl.com/y76xuk47>> [as of XX, 2026].

³ State of California Employment Development Dep't., Language Access Plan (2025-2027) <<https://tinyurl.com/49smaeew>> [as of XX, 2026].

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II. LOOKING TO PAST RECOMMENDATIONS: LONGITUDINAL ANALYSIS OF RACIAL AND IDENTITY GROUP DISPARITIES FOLLOWING REFORMS

[Content in development]

DOJ is assessing the viability of a longitudinal review of Wave 1 agencies' disparities in perceived racial and identity characteristics by looking at particular RIPA data elements (e.g., stops, consent search requests, use of force, or stop outcomes). This section will examine whether any Wave 1 agency implemented any change(s) in policy, practice, training, deployment, etc. since they began submitting RIPA data and analyze whether those changes are associated with a reduction in disparities. Through this exercise, the Board might be able to identify actions agencies have taken that appear to have worked to reduce racial disparities, including actions the Board may have recommended in past reports. The Board will continue its review of the policies enacted by the Los Angeles Police Department (limiting pretextual vehicle stops and vehicle stops for minor/non-safety violations) and the San Francisco Police Department (limiting vehicle stops for minor/non-safety violations). The Board has made specific policy recommendations in past reports, and is interested both in whether those recommendations were implemented by agencies and, if so, whether those recommendations have resulted in meaningful reform. In continuing the longitudinal look at the LAPD by including 2025 RIPA data, the discussion will note that while the Board has previously recommended the elimination of pretext stops, LAPD's reform stopped short of doing that. The next draft will describe LAPD's reform with more detail. To the extent possible, the analysis will keep consent searches as one of the data elements.

III. PRESENT DAY: "KAVANAUGH STOPS" AND HOW CALIFORNIA LAW PROTECTS INDIVIDUALS FROM RACIAL AND IDENTITY PROFILING

In the past, immigration enforcement operations were primarily focused on targeting individuals identified by immigration enforcement agencies as significant public safety risks.⁴ Today, those operations now involve multiple federal agencies and agents who operate in plainclothes, wear face coverings, or who display limited identifying information as an immigration agent.⁵ The targeting of immigrant communities has resulted in increased frequency of broad-based arrests⁶

⁴ In 2025, then-Acting Immigration and Customs Enforcement (ICE) Director Todd Lyons confirmed in an interview that ICE agents would arrest any undocumented individual regardless of whether they have a criminal record. Asian Journal News, *ICE Chief: Agents will arrest anyone found in U.S. illegally regardless of criminal history*, (July 20, 2025), <<https://tinyurl.com/258j3y5d>> [as of XX, 2026]; Haddock & Roy, *ICE and Deportations: How Trump Is Reshaping Immigration Enforcement*, Council on Foreign Relations (Feb. 27, 2026), <<https://www.cfr.org/articles/ice-and-deportations-how-trump-reshaping-immigration-enforcement>> [as of XX, 2026] (“[T]he Trump administration has, among other actions: declared an emergency at the southern U.S. border, enabling military action there; expanded expedited removals, which allow immigration officials to deport undocumented immigrants without a court hearing; initiated a mass deportation campaign involving hundreds of removal flights; broadened the authority of several agencies to enforce immigration laws; directed the creation of Homeland Security Task Forces in all fifty states to combat cross-border crime; and allocated tens of billions of dollars in additional funding to Immigration and Customs Enforcement (ICE) and other agencies for detention and deportation operations.”); Houser, *I worked for ICE and CBP. Our current system makes everyone less safe*, USA Today (Jan. 13, 2026) <<https://tinyurl.com/4hm7krnx>> [as of XX, 2026].

⁵ Fadel et al., *Masked immigration agents are spurring fear and confusion across the U.S.*, National Public Radio (July 10, 2025), <<https://www.npr.org/2025/07/09/nx-s1-5440311/ice-raids-masked-agents>> [as of XX, 2026].

⁶ Blair & Hausman, *Immigration Enforcement in the First Nine Months of the Second Trump Administration*, Deportation Date Project (Jan. 27, 2026), <<https://deportationdata.org/analysis/immigration-enforcement-first-nine-months-trump.html>> [as of XX, 2026]; Craft & Singh, *US arrests more immigrants in February 2025 than any*

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and increased concerns about racial and identity profiling.⁷ The increase in immigration enforcement actions impacts those residing in California, where foreign-born residents make up 28% of the population and represent 22% of the nation’s immigrant population,⁸ making California home to the largest immigrant population in the country. This shift in immigration enforcement practices has not only impacted individuals but led to the emergence of legal precedent that complicates California’s ability to prevent racial and identity profiling by state and local law enforcement.

Last year, the Board convened a special meeting to discuss racial and identity profiling in light of the immigration enforcement activity happening in California.⁹ The Board expressed that its mandate to reduce or eliminate racial and identity profiling in law enforcement, and the abuse of power that results from it, warranted discussion of recent immigration enforcement actions.¹⁰ The Board noted that although the Supremacy Clause of the U.S. Constitution limits California’s authority over federal matters and federal agents, California has led the nation in enacting state laws to protect the health and welfare of its residents, through its authority over state and local law enforcement officials, including the California Values Act (SB 54) and the Racial & Identity Profiling Act (AB 953).¹¹ This year, the Board takes a closer look at immigration enforcement operations and the state law obligations for California law enforcement agencies under SB 54 and AB 953.

A. *Noem v. Vasquez Perdomo and the Emergence of “Kavanaugh Stops”*

The Board has recognized that increased immigration enforcement activities can create apprehensions among the public, which may impact their engagement with state and local law enforcement agencies.¹² For this reason, the Board is especially interested in taking a closer look at immigration enforcement operations and the effects on Californians.

Public reports indicate that federal immigration enforcement agents are currently relying on a combination of factors that inevitably extend immigration enforcement stops to anyone whose

month in last seven years, The Guardian (Mar. 13, 2025) <<https://www.theguardian.com/us-news/2025/mar/13/us-immigration-arrests-february-2025>> [as of XX, 2026].

⁷ *How the Supreme Court’s Latest Decision Clears the Way for Racial Profiling During Immigration Raids*, American Immigration Council (Sept. 9, 2025), <<https://www.americanimmigrationcouncil.org/blog/supreme-courts-decision-racial-profiling-immigration-raids/>> [as of XX, 2026]; Sanchez & Vargas, *Racial profiling by ICE will have a marked impact on Latino communities*, Brookings (Oct. 16, 2025) <<https://tinyurl.com/p65duf3e>> [as of XX, 2026].

⁸ Cuellar Mejia & Johnson, *Immigrants in California*, Public Policy Institute of California (Jan. 2026), <<https://ppic.org/publication/immigrants-in-california>> [as of XX, 2026].

⁹ More information about the Board’s October 9, 2025 meeting, including the minutes from that meeting, the materials presented, and a recording of the meeting can be found on the Board’s website. (See Cal. Dep’t. of Justice, Racial and Identity Profiling Advisory Board Meetings <https://oag.ca.gov/ab953/meetings> [as of XX, 2026].)

¹⁰ More information about the Board’s October 9, 2025 meeting, including the minutes from that meeting, the materials presented, and a recording of the meeting can be found on the Board’s website. (See Cal. Dep’t. of Justice, Racial and Identity Profiling Advisory Board Meetings <https://oag.ca.gov/ab953/meetings> [as of XX, 2026].)

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appearance, language, employment, or presence matches a subjective profile.¹³ These factors include a person’s presence at particular work sites, the type of work they do, whether they speaking Spanish or speak English with an accent, and their apparent race or ethnicity. Currently, immigration agents can use these factors to determine whether they have reasonable suspicion to ask about an individual’s immigration status.¹⁴

These factors came into consideration by the Supreme Court after three Californians were detained by immigration agents and brought a constitutional challenge against the U.S. Department of Homeland Security (DHS) and DHS Secretary Kristi Noem.¹⁵ While waiting to be picked up for a construction job, four unmarked cars with tinted windows and no license plates abruptly surrounded the men.¹⁶ Multiple immigration agents — who were wearing masks and carrying guns, but who had no visible badges, and did not identify themselves — ran toward the Plaintiffs and arrested them.¹⁷ While the lower courts initially granted plaintiffs’ request for a temporary restraining order, on September 8, 2025, the Supreme Court granted Defendant Noem’s application to stay enforcement of the temporary restraining order, which for many “signaled [] support for ICE’s continued use of racial profiling in immigration policing.”¹⁸

The term ‘Kavanaugh stop’ emerged from Justice Kavanaugh’s concurring opinion and refers to an immigration enforcement stop justified by the factors discussed in *Noem v. Vasquez Perdomo*. Specifically, Justice Kavanaugh opined that, while “apparent ethnicity *alone* cannot furnish reasonable suspicion . . . it can be a ‘relevant factor’ when considered along with other salient factors” that, together, create reasonable suspicion someone is “illegally present” in the United States.¹⁹ Addressing the concern U.S. citizens would also be stopped and questioned based on their apparent ethnicity, Justice Kavanaugh reasoned that any such stops would be “brief,” and that when immigration agents “learn that the individual they stopped is a U.S. citizen or otherwise lawfully in the United States, they promptly let the individual go.”²⁰

As noted by some researchers, however, this assertion is not consistent with the experience of many U.S. citizens when being stopped by federal immigration agents.²¹ Americans have

¹³ Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days*. (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

¹⁴ *Noem v. Vasquez Perdomo* (2025) 146 S.Ct. 1, 2.

¹⁵ *Vasquez Perdomo v. Noem* (9th Cir. 2025) 148 F.4th 656.

¹⁶ *Vasquez Perdomo v. Noem* (9th Cir. 2025) 148 F.4th 656, 668.

¹⁷ *Vasquez Perdomo v. Noem* (9th Cir. 2025) 148 F.4th 656, 668.

¹⁸ Chacón, *Whose Common Sense? Some Reflection on Noem v. Vasquez Perdomo*, Border Criminologies, University of Oxford Faculty Law Blogs, Sept. 24, 2025 <<https://blogs.law.ox.ac.uk/border-criminologies-blog/blog-post/2025/09/whose-common-sense-some-reflections-noem-v-vazquez>> [as of XX, 2026].

¹⁹ *Noem v. Vasquez Perdomo* (2025) 146 S.Ct. 1, 3, emphasis added.

²⁰ *Noem v. Vasquez Perdomo* (2025) 146 S.Ct. 1, 1.

²¹ Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

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reportedly been dragged,²² tackled,²³ beaten,²⁴ tased,²⁵ and shot²⁶ by immigration enforcement agents. Some citizens have also reported having their necks kneeled on,²⁷ being held outside in the rain while in their underwear,²⁸ and being “roughed up” and “shoved” while pregnant.²⁹

²² Wilmer, *US Citizen and Army Veteran Submits Claims for Unconstitutional Immigration Detention* (Aug. 18, 2025) Institute for Justice <<https://tinyurl.com/2hrukr4s>> [as of XX, 2026] (Federal immigration agents encountered U.S. citizen and veteran George Retes, who reported that he was pepper sprayed and tear gassed, and his car window was broken); Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

²³ Louallen, *79-year-old US citizen claims ICE agents body-slammed him at his business, seeks \$50M* (Sept. 26, 2025) ABC News <<https://tinyurl.com/4sefxcw2>> [as of XX, 2026] (Rafie Ollah Shouhed, 79 years old and a U.S. citizen, claims to have “suffered multiple broken ribs, elbow injuries and a traumatic brain injury during the Sept. 9 incident” where he alleges that agents “violently body-slammed him onto the pavement”); Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days*. (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

²⁴ Lehr, *Oxnard Man Released After Being Detained by ICE Agents While Filming Father's Arrest* (June 19, 2025) KEYT News Channel 3-12 <<https://tinyurl.com/yajvfjdd>> [as of XX, 2026] (U.S. citizen claimed to have been “attacked by these ICE agents, maced, punched, and beaten”); Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

²⁵ Terry, *U.S. citizen tased and detained during ICE operation in Des Plaines, Illinois* (Sept. 16, 2026) CBS News <<https://tinyurl.com/5n6p4mmc>> [as of XX, 2026] (“Edgar said he was tased in the face. That’s when he told everyone in the truck to run for their lives. Despite being a U.S. citizen, he said they ran out of fear”); Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

²⁶ Uranga, *U.S. citizen shot from behind as he warned ICE agents about children gathering at bus stop, lawyers say* (Nov. 2, 2025) Los Angeles Times <<https://tinyurl.com/4zetnbre>> [as of XX, 2026] (U.S. citizen Carlos Jimenez reported being shot by ICE agents in Ontario, California after warning them about children gathering at a nearby school bus stop.); Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

²⁷ Democracy Now!, *“They Kidnapped Me”: L.A. Immigrant Rights Activist Recounts Violent Arrest by Masked Federal Agents* (Aug. 19, 2025) <<https://tinyurl.com/nkv9m6du>> [as of XX, 2026] (Footage of the arrest of Amanda Trebach, a U.S. citizen, “shows two plainclothes, masked agents pinning her against the pavement as they kneel on her back and head to handcuff her. One of the agents is seen putting his knee on her head for a brief moment as someone recording yells, “Get off her head!”); Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

²⁸ Acevedo, *U.S.-citizen family “traumatized” after ICE raided their Oklahoma home in search of someone else* (Apr. 30, 2025) NBC News <<https://tinyurl.com/5n8pzswd>> [as of XX, 2026] (A family of U.S. citizens reported that about 20 armed agents “busted through the door in the middle of the night” and ordered the family to step outside, even though it was raining and they barely were given time to put on clothes); Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They've Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

²⁹ Medina & Soto, *Pregnant US citizen speaks out after being detained by ICE agents searching for her husband* (Aug. 8, 2025) MSN <<https://tinyurl.com/597rjxf2>> [as of XX, 2026] (Video on social media shows the arrests of Sabrina Medina, a U.S. citizen, outside her health clinic, who claimed that “agents roughed her up and pushed her belly against the car”); Acevedo, *A pregnant U.S. citizen went to the hospital after immigration agents detained her* (June 10, 2025) NBC News <<https://tinyurl.com/sm37f77b>> [as of XX, 2026] (Cary López Alvarado, a U.S. citizen, reported that she lost her balance as masked agents wearing Border Patrol uniforms “shoved her” during her arrest, and that she started experiencing sharp pains in her stomach after she was arrested and had to go to the hospital);

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ProPublica reviewed accounts of immigration enforcement agents detaining U.S. citizens and “found more than 170 such incidents during the first nine months of President Donald Trump’s second administration.”³⁰ Among the citizens detained were nearly 20 children, including two children with cancer.³¹ Four of the children were held for weeks with their undocumented mother and without access to an attorney until a congresswoman intervened.³² Two dozen Americans reported being held for more than a day without being able to contact attorneys or next of kin. ProPublica also found that agents had arrested about 130 American citizens, including a dozen elected officials, for allegedly interfering with or assaulting officers, yet those cases were often dropped and not prosecuted.³³

Latinos across California have reported heightened levels of fear and anxiety amid increased immigration enforcement activity.³⁴ Mental health clinicians have reported that Latino patients are exhibiting “hypervigilance, a heightened sense of awareness linked to survival that many have started experiencing since the raids began.”³⁵ Experts warn that the effects of hypervigilance and immigration anxiety “are not only mental, but also physical and spiritual, shaping how people think, feel, cope, and make meaning of their daily lives.”³⁶ Over time the “sustained stress can keep the nervous system in a prolonged state of heightened alert, contributing to symptoms like fatigue, headaches, and sleep disturbances as well as increasing the risk or worsening of conditions like hypertension, cardiovascular disease, anxiety disorders, depression, gastrointestinal disorders, and more.”³⁷

While many of the individuals being targeted in response to large-scale immigration sweeps are Latino,³⁸ other demographics are also being impacted, including Native Americans.³⁹ There have been reports of immigration enforcement officers not accepting Tribal citizenship documentation as proof of citizenship during immigration enforcement operations despite longstanding law

Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days*. (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

³⁰ Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

³¹ Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

³² Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

³³ If U.S. citizens interfere with or assault federal immigration enforcement agents while they are performing their duties, the agents are authorized to detain and arrest those individuals for their alleged behavior. Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

³⁴ Sánchez-Tello, *ICE Raids Take Toll on Latino Mental Health: ‘It’s Been Nonstop’*, Capital and Main (Sept. 12, 2025) <<https://tinyurl.com/55s2d6dn>> [as of XX, 2026]; Preciado, *Immigration raids have made skin color top of mind for a new generation of California Latinos*, CalMatters (June 18, 2026) <<https://calmatters.org/commentary/2026/06/immigration-raids-new-generation-latinos/>> [as of XX, 2026].

³⁵ Sánchez-Tello, *ICE Raids Take Toll on Latino Mental Health: ‘It’s Been Nonstop’*, Capital and Main (Sept. 12, 2025) <<https://tinyurl.com/55s2d6dn>> [as of XX, 2026].

³⁶ Reichard, *The terror of living with immigration anxiety*, MSN (June 9, 2026) <<https://tinyurl.com/yp429aes>> [as of XX, 2026].

³⁷ Reichard, *The terror of living with immigration anxiety*, MSN (June 9, 2026) <<https://tinyurl.com/yp429aes>> [as of XX, 2026].

³⁸ Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days* (Oct. 16, 2025) ProPublica <<https://tinyurl.com/4paf32wu>> [as of XX, 2026].

³⁹ Hay, *Native Americans Say Tribal Members Harassed by Immigration Agents* (Jan. 30, 2025) Reuters <<https://tinyurl.com/mt4r2fry>> [as of XX, 2026].

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affirming that all Native Americans born within the territorial limited of the United States are U.S. citizens⁴⁰ and that tribal identification cards are an acceptable form of federal identification, including at land and sea borders.⁴¹

Race- and identity-based immigration enforcement creates a climate of fear and anxiety for entire communities. In cities with a “substantial Native population that includes individuals of mixed Native and Latino or Hispanic heritage, the result [is] the profiling of Tribal citizens whose physical appearances [are] treated as a proxy for immigration status.”⁴² Navajo Nation President Buu Nygren shared that members of the Navajo Nation have had traumatizing experiences with ICE agents.⁴³ A telling case is Jose Roberto Ramirez, a 20-year-old citizen of the Red Lake Nation who was detained by ICE agents in January.⁴⁴ Videos show ICE agents “drawing guns, dragging Ramirez from his car, and handcuffing him. Although his aunt showed his birth certificate and U.S. passport, agents refused to release him; one even told Ramirez ‘he wasn’t from here.’ ICE detained Ramirez for several hours before letting him go without charges.”⁴⁵ Examples like this show the consequences of targeting individuals for immigration enforcement based on traits they are born with, places they frequent, profession, or the language they speak.

Reported accounts of interactions between the public and immigration enforcement agents can help California residents understand how these practices may affect California’s diverse communities. For state and local law enforcement agencies, these accounts highlight how immigration enforcement operations may impact the residents in their jurisdictions.

B. California Law

While the Supreme Court’s order in *Noem v. Vasquez Perdomo* may lead to more racially driven immigration enforcement practices by federal officers,⁴⁶ California law protects all Californians from racial and identity profiling in state and local law enforcement operations, regardless of

⁴⁰ Indian Citizenship Act of 1924, Pub. L. No. 68-175, 43 Stat. 253.

⁴¹ Kunesh, *Native Americans are getting swept up in immigration raids. Homeland Security Secretary Mullin has an opportunity to fix it* (Apr. 17, 2025) Brookings <<https://tinyurl.com/ydcus8us>> [as of XX, 2026]. Several Tribes issue Enhanced Tribal Cards (ETCs) that are legal identification documents recognized under 8 C.F.R. § 235.1(e) (2024). See also Western Hemisphere Travel Initiative: Designation of an Approved Native American Tribal Card Issued by the Kickapoo Traditional Tribe of Texas as an Acceptable Document To Denote Identity and Citizenship for Entry in the United States at Land and Sea Ports of Entry, 87 Fed. Reg. 37,879 (June 24, 2022) (representative designation notice under § 7209 of the Intelligence Reform and Terrorism Prevention Act of 2004, Pub. L. No. 108-458, 118 Stat. 3638). Some Tribes, such as the Tlingit and Haida Tribe, also issue enhanced Tribal cards with security features that meet the requirements of the Western Hemisphere Travel Initiative.

⁴² Kunesh, *Native Americans are getting swept up in immigration raids. Homeland Security Secretary Mullin has an opportunity to fix it* (Apr. 17, 2025) Brookings <<https://tinyurl.com/ydcus8us>> [as of XX, 2026].

⁴³ Hay, *Native Americans Say Tribal Members Harassed by Immigration Agents* (Jan. 30, 2025) Reuters <<https://tinyurl.com/mt4r2fry>> [as of XX, 2026].

⁴⁴ Schafer, *‘I felt like I was kidnapped’: Ojibwe man recounts ICE detainment* (Jan. 9, 2026) ICT News <<https://tinyurl.com/38586sst>> [as of XX, 2026] (“Ramirez said multiple times he tried informing the agents he was a US citizen and a descendant of a federally recognized tribe . . .” “I felt like I was kidnapped”).

⁴⁵ Kunesh, *Native Americans are getting swept up in immigration raids. Homeland Security Secretary Mullin has an opportunity to fix it* (Apr. 17, 2025) Brookings <<https://tinyurl.com/ydcus8us>> [as of XX, 2026].

⁴⁶ “The Supreme Court effectively rubber stamped the executive branch’s practice of engaging in racial profiling, without any meaningful consideration of the harms that result from wrongful stops, arrests, detentions, and deportations,” said Elora Mukherjee, the director of Columbia Law School’s Immigrants’ Rights Clinic” Wise, *ICE Apprehension of US Citizens Derided as ‘Kavanaugh Stops* (Oct. 1, 2025) Bloomberg L. <<https://tinyurl.com/2t9kj7xr>> [as of XX, 2026]

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immigration status. AB 953 explicitly prohibits state and local law enforcement officers from engaging in racial or identity profiling and established the Racial and Identity Profiling Advisory Board to help eliminate such practices.⁴⁷ The California Constitution also prohibits law enforcement officers from discriminating against individuals on the basis of race and other protected characteristics.⁴⁸

When state and local law enforcement officers participate in joint task forces with federal agencies, those officers must be careful to ensure that they remain in compliance with state law and California's prohibition on racial and identity profiling, particularly in light of the Supreme Court's order in *Noem v. Vasquez Perdomo*, which, for the time being, has allowed immigration agents to resume stops and detentions based in part on perceived race, language, profession, and location, even though such stops may ultimately be found to be unconstitutional. Under the California Values Act (SB 54), for instance, state and local law enforcement agencies may participate in joint task force with federal law enforcement agencies, so long as the primary purpose of the joint task force is not immigration enforcement.⁴⁹ AB 953 and SB 54 create separate compliance obligations for any state or local law enforcement agency participating in a joint task force with federal law enforcement agencies. Therefore, California law enforcement agencies participating in joint task forces should be especially mindful in ensuring compliance with state law, and that such participation may raise concerns about how that participation may be perceived by the communities they serve.

1. How the Racial and Identity Profiling Act Restricts the Use of Kavanaugh Stops by State and Local Law Enforcement Officers

AB 953⁵⁰ outlines comprehensive protections against law enforcement stops based on protected characteristics. California Penal Code section 13519.4 (f) states that “[a] peace officer shall not engage in racial or identity profiling.”⁵¹ RIPA defines “racial or identity profiling” as “the consideration of, or reliance on, to any degree, actual or perceived race, color, ethnicity, national origin, age, religion, gender identity or expression, sexual orientation, or mental or physical disability in deciding which persons to subject to a stop or in deciding upon the scope or substance of law enforcement activities following a stop.” This prohibition against racial and identity profiling applies to all law enforcement activities by state and local police including traffic stops, pedestrian stops, questioning, searches, and arrests, except when officers rely on characteristics listed in a specific suspect description.⁵²

⁴⁷ The statute defines “racial profiling” as “the consideration of, or reliance on, to any degree, actual or perceived race, color, ethnicity, national origin, age, religion, gender identity or expression, sexual orientation, or mental or physical disability in deciding which persons to subject to a stop or in deciding upon the scope or substance of law enforcement activities following a stop, except that an officer may consider or rely on characteristics listed in a specific suspect description. The activities include, but are not limited to, traffic or pedestrian stops, or actions during a stop, such as asking questions, frisks, consensual and nonconsensual searches of a person or any property, seizing any property, removing vehicle occupants during a traffic stop, issuing a citation, and making an arrest.” Pen. Code, § 13519.4, subd. (e); see *id.*, § 13519.4, subd. (h) (identifying implicit bias as part of what makes up racial or identity profiling).

⁴⁸ Cal. Const., art. I, § 7, subd. (a). Other state laws prohibit state law enforcement discrimination against individuals on the basis of race and other protected characteristics as well. See, e.g., Gov. Code, § 11135.

⁴⁹ Gov. Code, § 7284.6.

⁵⁰ Codified in Pen. Code, § 13519.4.

⁵¹ Pen. Code, § 13519.4, subd. (f).

⁵² Pen. Code, § 13519.4 subd. (e).

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Recognizing the harms of racial and identity profiling, AB 953 notes that “[r]acial or identity profiling alienates people from law enforcement, hinders community policing efforts, and causes law enforcement to lose credibility and trust among the people whom law enforcement is sworn to protect and serve.”⁵³ Because of this, AB 953’s prohibition against profiling applies to all peace officers within California, without exception based on immigration status.

2. The California Values Act (SB 54) and Joint Law Enforcement Task Forces

There have been publicly reported concerns that state and local enforcement officers are engaging in or perceived to be engaging in immigration enforcement actions.⁵⁴ These concerns are difficult for the Board to ignore given the rise in immigration enforcement practices that critics say disproportionately target individuals based on race or ethnicity.⁵⁵ Given its mandate to reduce or eliminate racial and identity profiling, the Board is focusing attention on joint task forces and the obligations California law enforcement agencies carry under AB 953 and SB 54 when participating in joint task force operations.

California state law restricts state and local law enforcement officers from engaging in immigration enforcement actions, with a number of exceptions.⁵⁶ SB 54⁵⁷ defines “immigration enforcement” as “any and all efforts to investigate, enforce, or assist in the investigation or enforcement of any federal civil immigration law, and also includes any and all efforts to investigate, enforce, or assist in the investigation or enforcement of any federal criminal immigration law that penalizes a person’s presence in, entry, or reentry to, or employment in, the United States.”⁵⁸ Importantly, SB 54’s general restrictions do not prevent a state or local law enforcement agency from conducting enforcement or investigative duties associated with a “joint law enforcement task force,” which, by definition, includes at least one federal law enforcement agency,⁵⁹ provided the following conditions are met: (a) the joint task force’s primary purpose is not immigration enforcement; (b) the enforcement or investigative duties are primarily related to a violation of state or federal law unrelated to immigration enforcement; and, (c) participation in the joint task force does not violate any local law or policy to which it is otherwise subject.⁶⁰

California law enforcement agencies must also comply with local laws or agency policies that may impose greater restrictions on their activities than SB 54. The California Department of Justice Division of Law Enforcement has reminded California law enforcement agencies that they should “determine whether, even if SB 54 permits assistance in immigration enforcement

⁵³ Pen. Code, §13519.4 subd. (d)(3).

⁵⁴ [Cite]

⁵⁵ Somin, *Immigration Restrictions Restrict Americans’ Liberties*, Cato Institute (Mar. 20, 2026) <<https://tinyurl.com/52hwa2e6>> [as of XX, 2026]; Chrishti and Bush-Joseph, *In First 100 Days, Trump 2.0 Has Dramatically Reshaped the U.S. Immigration System, but Is Not Meeting Mass Deportation Aims*, Migration Policy Institute (Apr. 24, 2025) <<https://tinyurl.com/y8ae4hxn>> [as of XX, 2026].

⁵⁶ Gov. Code, §§ 7284.6, subd. (a)(1)(C), 7282.5, subds. (a), (b).

⁵⁷ SB 54 was signed into law on October 5, 2017, and went into effect January 1, 2018.

⁵⁸ Gov. Code, § 7284.4, subd. (f).

⁵⁹ Gov. Code, § 7284.4, subd. (g).

⁶⁰ Gov. Code, § 7284.6, subd. (b)(3)(A)-(C). For an overview of the various ways SB 54 limits the discretion of California law enforcement agencies to participate in immigration-related activities please review the information bulletin issues by the California Department of Justice Division of Law Enforcement on January 17, 2025 available here: <https://oag.ca.gov/system/files/media/2025-dle-03.pdf> [as of XX, 2026].

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related activities, the agency’s policy or local law or policies prohibit such activities.”⁶¹ Further, if a particular activity is prohibited by the agency or the agency’s jurisdiction, the agency “must comply with the more restrictive conditions of the agency or jurisdiction so long as the local law or policy complies with 8 U.S.C. §§ 1373 and 1644, governing restrictions on the exchange of a person’s immigration and citizenship status with government officials.”⁶² Among the laws and policies which law enforcement agencies must direct their attention to is, of course, AB 953 and its prohibition on racial and identity profiling. Taken together, SB 54 and AB 953 restrict California law enforcement officers engaging in racial or identity profiling, including while on a joint federal task force.

Thus, while the Supreme Court concurrence in *Noem v. Vasquez Perdomo* means that federal law enforcement agents may rely on factors (such as an individual’s perceived race or ethnicity, or a person’s language or accent) to form reasonable suspicion to stop an individual and ask about their immigration status, state or local law enforcement officers that participate in joint task forces with federal agencies should be cognizant of state law’s prohibition on racial or identity profiling.

[Content in development re: potential, brief discussion of JTF participation as being an area in which CA agencies may contribute data from ALPRs or other cameras, pursuant to Board feedback at June 9, 2026 subcommittee meeting.]

a. SB 54 Joint Task Force Reports

California law enforcement agencies must submit a report annually to the California Department of Justice if they choose to participate in a joint law enforcement task force.⁶³ The Attorney General reports on the total number of arrests made by joint law enforcement task forces and the total number of arrests made for the purpose of immigration enforcement by all task force participants, including federal law enforcement agencies.⁶⁴ The Attorney General’s reporting obligations began on March 1, 2019.⁶⁵ The information contained in the reports is based on the submissions the California Department of Justice receives from law enforcement agencies. The California Department of Justice conducts outreach and quality control reviews, but ultimately California law enforcement agencies are responsible for the accuracy of their submissions.⁶⁶

⁶¹ Cal. Dept. of Justice, *Div. of Law Enforcement, Information Bulletin No. 2025-DLE-03, Updated Responsibilities of Law Enforcement Agencies Under the California Values Act, California TRUST Act, and the California TRUTH Act* (Jan. 17, 2025) <<https://oag.ca.gov/system/files/media/2025-dle-03.pdf>> [as of XX, 2026].

⁶² Cal. Dept. of Justice, *Div. of Law Enforcement, Information Bulletin No. 2025-DLE-03, Updated Responsibilities of Law Enforcement Agencies Under the California Values Act, California TRUST Act, and the California TRUTH Act* (Jan. 17, 2025) <<https://oag.ca.gov/system/files/media/2025-dle-03.pdf>> [as of XX, 2026].

⁶³ Gov. Code, § 7284.6, subd. (c)(1).

⁶⁴ Gov. Code, § 7284.6, subd. (d).

⁶⁵ Gov. Code, § 7284.6, subd. (d).

⁶⁶ Gov. Code, § 7284.6, subd. (d). Reports on the number of arrests made by joint law enforcement task forces are available here: <https://openjustice.doj.ca.gov/resources/publications> [as of XX, 2026]. Of note, California law enforcement agencies are the owners of the information submitted to the California Department of Justice. Since there is no list or registry of all joint task forces for comparison, the California Department of Justice cannot verify the completeness or accuracy of the data it receives. The information contained in the reports is based on the submissions it receives from law enforcement agencies. The California Department of Justice conducts outreach and quality control reviews, but ultimately California law enforcement agencies are responsible for the accuracy of their submissions. The reports issued by the California Department of Justice note this limitation.

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Public awareness of the number of arrests made by joint task forces may be becoming more salient given the current approach to immigration enforcement. The number of arrests made by participants in joint task forces that were reported as arrests made for immigration enforcement purposes increased markedly in 2025. The progression is documented in the table below. For clarity, the reported numbers do not indicate how many, if any, of the arrests made for immigration enforcement purposes were made by California state or local law enforcement officers, as distinguished from federal or other non-California officers.

Year	Total Arrests Reported by Task Force Participants	Arrests for Purpose of Immigration Enforcement
2018 ⁶⁷	13,960	7
2019 ⁶⁸	15,672	35
2020 ⁶⁹	13,737	1
2021 ⁷⁰	13,962	0
2022 ⁷¹	14,163	1
2023 ⁷²	13,760	0
2024 ⁷³	18,085	12
2025 ⁷⁴	16,613	300

If the trajectory continues at this rate, immigration enforcement arrests could represent a larger share of total joint task force activity in the coming years. This could raise concerns about whether joint task forces are reshaping how AB 953 and SB 54 operate.

IV. PRESENT DISPARITIES IN POST-STOP ACTIONS BY PERCEIVED ENGLISH FLUENCY

A. Analysis of 2025 RIPA Data Compared to Prior Years

[Content in development]

⁶⁷ Cal. Dept. of Justice, *California Values Act Report 2018* (Aug. 2022) <<https://data-openjustice.doj.ca.gov/sites/default/files/2022-08/values-act-sb54-2018.pdf>> [as of XX, 2026].

⁶⁸ Cal. Dept. of Justice, *California Values Act Report 2019* (Aug. 2022) <<https://data-openjustice.doj.ca.gov/sites/default/files/2022-08/SB54%20Pub%202019.pdf>> [as of XX, 2026].

⁶⁹ Cal. Dept. of Justice, *Values Act Senate Bill 54 Annual Report for 2020* (Aug. 2022) <<https://data-openjustice.doj.ca.gov/sites/default/files/2022-08/SB54%202020%20Final.pdf>> [as of XX, 2026].

⁷⁰ Cal. Dept. of Justice, *Values Act Senate Bill 54 Annual Report for 2021* (Aug. 2022) <<https://data-openjustice.doj.ca.gov/sites/default/files/2022-08/values-act-sb54-2021.pdf>> [as of XX, 2026].

⁷¹ Cal. Dept. of Justice, *Values Act Senate Bill 54 Annual Report for 2022* (Mar. 2023) <<https://data-openjustice.doj.ca.gov/sites/default/files/2023-03/sb54-report-2022.pdf>> [as of XX, 2026].

⁷² Cal. Dept. of Justice, *Values Act Senate Bill 54 Annual Report for 2023* (Mar. 2024) <<https://data-openjustice.doj.ca.gov/sites/default/files/2024-03/SB%2054%20Values%20Act%20Report%202023.pdf>> [as of XX, 2026].

⁷³ Cal. Dept. of Justice, *Values Act Senate Bill 54 Annual Report fo2024* (Feb. 2025) <<https://data-openjustice.doj.ca.gov/sites/default/files/2025-02/sb54-values-act-report-2024.pdf>> [as of XX, 2026].

⁷⁴ Cal. Dept. of Justice, *Values Act Senate Bill 54 Annual Report for 2025* (Feb. 2026) <<https://data-openjustice.doj.ca.gov/sites/default/files/2026-02/sb-54-values-act-report-2025.pdf>> [as of XX, 2026].

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This section will build off last year’s analysis of perceived English fluency by looking at what the stop data shows by perceived language and race/ethnicity. The analysis will look at stops where officers perceived individuals as having limited/no English fluency and examine whether there are differences across perceived racial and ethnic groups across different data elements, including actions taken, whether force was used, the outcome of the stop, and the duration of the stop. DOJ will run this analysis for 2025 and for prior years to determine whether there are any changes over time that may be reflected in the data. The hypothesis being explored is that, for some groups, being perceived as having limited English fluency may have a disparate adverse impact across perceived race or ethnicity groups. Stated differently, this analysis explores whether being perceived as having limited English fluency may increase the likelihood of certain adverse actions being taken against members of one racial group more than it increases the likelihood of such actions being taken against members of other racial groups. In light of the draft, potential Board recommendations concerning language fluency set forth below, if possible, contextual information will be included in this section regarding what policies and trainings presently exist and do not exist related to stops of people who speak limited English.

V. TECHNOLOGIES AND THE FUTURE

This section explores several technologies that may impact the future of racial and identity group profiling and disparities: Automated license plate reader systems, technology-assisted police body-worn camera footage review technologies, and RIPA stop data collection analytics tools. As in the 2026 RIPA Report, the Board addresses automated license plate reader (ALPR) systems in this year’s report as an area requiring further consideration and assessment from the standpoint of racial and identity profiling and disparities. The discussion places particular focus on the concern that California agencies’ ALPR data might contribute to racial and identity profiling by immigration authorities in California, and also notes that connecting private surveillance footage to law enforcement systems carries a risk of private bias leading to racial profiling and disparities by police. The Board also assesses the emerging practice of using technologies to review police body-worn camera footage, and how that practice, when used properly, can aid in various efforts to reduce racial and identity group profiling and disparities. Finally, the Board looks at how California law enforcement agencies can use RIPA stop data collection analytics tools in the future to better equip themselves to act against racial profiling and disparities. It should be noted that, in discussing certain vendor products available to law enforcement agencies in this section, the Board is not endorsing any particular product(s) and is relying on publicly available information.

A. Automated License Plate Reader Technology

Automatic license plate reader (ALPR) systems use cameras and computer software to scan the license plates of automobiles captured by their cameras, logging and storing information about the vehicle, such as the time and date and coordinates of the vehicle, and pictures of the vehicle.⁷⁵ The Board has recognized that ALPR systems “can be deployed to target communities of color and other marginalized populations,” and there is evidence that ALPR cameras, and the queries that have been run against ALPR system databases, can contribute to racial profiling.⁷⁶ In

⁷⁵ 2026 RIPA Board Report, 119 & fn. 207; U.S. Department of Homeland Security and National Urban Security Technology Laboratory, *Automated License Plate Readers, Market Survey Report* (June 2025), <<https://www.dhs.gov/science-and-technology/saver/automatic-license-plate-readers>> [as of XX, 2026]; Finklea, Congressional Research Services, *Law Enforcement and Technology: Use of Automated License Plate Readers* (Aug. 19, 2024), 1-2 <<https://www.congress.gov/crs-product/R48160>> [as of XX, 2026].

⁷⁶ 2026 Annual RIPA Report, 120 & fn. 208, 209.

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the 2026 RIPA Report, the Board also recognized that ALPR systems do, or can, deliver public safety benefits and that some proponents of such technologies promote them as tools that may actually help reduce racial and identity profiling and disparities.⁷⁷

This section reviews ALPR systems' expanding capabilities and applications and briefly revisits the concern about ALPR systems targeting communities of color. The section then addresses the concern that California law enforcement agencies' ALPR data may be shared with immigration authorities. This possibility gives rise to the concern that California law enforcement agencies may be facilitating racial profiling in Californians by federal immigration authorities, even if only inadvertently.

1. Expanding Capabilities and Uses

ALPR systems are powerful surveillance and investigatory tools that are increasingly used to do much more than just read license plate numbers and check them against "hot lists" of stolen vehicles or other vehicles believed to be associated with certain criminal activity.⁷⁸ The U.S. Department of Homeland Security notes that:

ALPR software ranges in complexity from simple smartphone apps that read plates and compare them against user-generated hot lists to sophisticated systems that use machine learning and artificial intelligence to conduct complex analysis. The most sophisticated software can process images, read the plate number, determine the make, model, color and year of a vehicle, compare plates against local and national hot lists, make predictions on probable routes of travel, send localized alerts to law enforcement units in the area, automatically generate vehicle activity reports, and analyze system results to improve future system accuracy.⁷⁹

The technology behind ALPR systems is becoming increasingly sophisticated. ALPR cameras may take pictures of individuals in vehicles⁸⁰ and may even be installed on law enforcement

⁷⁷ 2026 Annual RIPA Report, 116-117.

⁷⁸ Stanley, ACLU, *New Report Highlights How CBP and Border Patrol are Becoming a Repressive Internal Intelligence Agency* (Nov. 24, 2025) <<https://www.aclu.org/news/privacy-technology/border-patrol-alpr-dragnet>> [as of XX, 2026] (describing the U.S. Custom and Border Patrol's use of ALPR surveillance system to identify purportedly suspicious movement patterns).

⁷⁹ U.S. Department of Homeland Security and National Urban Security Technology Laboratory, *Automated License Plate Readers, Market Survey Report* (June 2025), 6 <<https://www.dhs.gov/science-and-technology/saver/automatic-license-plate-readers>> [as of XX, 2026]; see also U.S. Department of Homeland Security and National Urban Security Technology Laboratory, *Automated License Plate Readers, Market Survey Report* (June 2025), 1 <<https://www.dhs.gov/science-and-technology/saver/automatic-license-plate-readers>> [as of XX, 2026] ("With advances in machine learning, computer vision, and artificial intelligence (AI), ALPR systems now can read much more than license plates. ALPR software can detect dents on cars, search for specific bumper stickers, process specialty tags, and recognize rideshare logos"); *id.* at 7 (discussing some systems' capability to use AI to analyze photos and compare them to images in databases); *id.* at 7 (some systems can identify direction of travel and, where there are no egress routes without passing a camera, calculate the amount of time a vehicle remains within a defined area); Finklea, Congressional Research Services, *Law Enforcement and Technology: Use of Automated License Plate Readers* (Aug. 19, 2024), 1 <<https://www.congress.gov/crs-product/R48160>> [as of XX, 2026] ("Initially, ALPRs were thought of as a tool to help combat automobile theft, but their use has expanded. Agencies use ALPRs for a variety of purposes, including gathering intelligence and evidence, helping identify or apprehend potential suspects in a range of criminal investigations, locating missing or kidnapped individuals, and facilitating crime scene analysis").

⁸⁰ Finklea, Congressional Research Service, *Law Enforcement and Technology: Use of Automated License Plate Readers* (Aug. 19, 2024), 5 <<https://www.congress.gov/crs-product/R48160>> [as of XX, 2026]; Congressional

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drones.⁸¹ ALPR systems are also becoming capable of searching for “free-form information” in the photographs they take — “as an example, a ‘red truck with black toolbox mounted on the bed’ or a ‘blue, 4-door hatchback with yellow smiley face bumper sticker.’”⁸² The systems are increasingly used as “a critical component in predictive policing,”⁸³ in which technologies direct law enforcement to areas that have already been receiving a disproportionate share of policing, leading to a prediction of more crime in those areas, an increase in the intensity of policing in such areas, and the possibility of more racial profiling and disparities.⁸⁴ However, ALPR systems are only subject to limited regulations.⁸⁵ The California Governor vetoed a bill in the Fall of 2025 that would have limited the permissible use of ALPR data to locating vehicles or persons when either are reasonably suspected of being involved in the commission of a public offense.⁸⁶ The bill would have limited most data retention to 60 days.⁸⁷

2. Visibility and Public Input

Existing California law requires a public agency that operates or intends to operate an ALPR system to provide an opportunity for public comment at a regularly scheduled public meeting of the governing body of the public agency before implementing the program.⁸⁸ Because ALPR technology and data can be used to target certain racial or identity groups for surveillance or

Research Service, Exposed Data Highlights Law Enforcement Use of Selected Technologies (Jul. 10, 2019), 1 <<https://tinyurl.com/2e59595y>> [as of XX, 2026]; Electronic Frontier Foundation, Street Level Surveillance, Automated License Plate Readers <<https://sfs.eff.org/technologies/automated-license-plate-readers-alprs>> [as of XX, 2026].

⁸¹ Lipton, *That Drone in the Sky Could Be Tracking Your Car*, Electronic Frontier Foundation (Sept. 22, 2025) <<https://www.eff.org/deeplinks/2025/09/drone-sky-could-be-tracking-your-car>> [as of XX, 2026].

⁸² U.S. Department of Homeland Security and National Urban Security Technology Laboratory, *Automated License Plate Readers, Market Survey Report* (June 2025), pp. 9, 16 <<https://www.dhs.gov/science-and-technology/saver/automatic-license-plate-readers>> [as of XX, 2026]; see *id.* at 15 (“AI is advancing applications such as real-time crime predication [*sic*]”); Finklea, Congressional Research Services, *Law Enforcement and Technology: Use of Automated License Plate Readers* (Aug. 19, 2024), 2 <<https://www.congress.gov/crs-product/R48160>> [as of XX, 2026] (“Police can also analyze stored LPR data to help identify patterns of suspicious or criminal activity.”) (citing International Association of Chiefs of Police report).

⁸³ U.S. Department of Homeland Security and National Urban Security Technology Laboratory, *Automated License Plate Readers, Market Survey Report* (June 2025), 16 <<https://www.dhs.gov/science-and-technology/saver/automatic-license-plate-readers>> [as of XX, 2026]; see *id.* at 15 (“AI is advancing applications such as real-time crime predication [*sic*]”); Kristin Finklea, Congressional Research Services, *Law Enforcement and Technology: Use of Automated License Plate Readers* (Aug. 19, 2024), 2 <<https://www.congress.gov/crs-product/R48160>> [as of XX, 2026] (“Police can also analyze stored LPR data to help identify patterns of suspicious or criminal activity”) (citing International Association of Chiefs of Police report).

⁸⁴ See 2026 Annual RIPA Report, 119, 124.

⁸⁵ Civ. Code, § 1798.90.55, subd. (a).

⁸⁶ Johnson and Al Elew, *Newsom Just Vetoed a Bill to Regulate License Plate Readers—Even as Fresh Evidence of Misuse Emerges*, CalMatters (Oct. 3, 2025) <<https://tinyurl.com/aa9ubfev>> [as of XX, 2026]; Governor’s Veto Message <<https://tinyurl.com/33n4pbsz>> [as of XX, 2026]; California Senate Bill No. 274 (2025-2026 Reg. Session) <<https://tinyurl.com/bdc6j9vm>> [as of XX, 2026] (showing how the bill would have amended California’s existing law regulating ALPRs).

⁸⁷ Johnson and Al Elew, *Newsom Just Vetoed a Bill to Regulate License Plate Readers—Even as Fresh Evidence of Misuse Emerges*, CalMatters (Oct. 3, 2025) <<https://tinyurl.com/aa9ubfev>> [as of XX, 2026]; Governor’s Veto Message <<https://tinyurl.com/33n4pbsz>> [as of XX, 2026]; California Senate Bill No. 274 (2025-2026 Reg. Session) <<https://tinyurl.com/bdc6j9vm>> [as of XX, 2026] (showing how the bill would have amended California’s existing law regulating ALPRs).

⁸⁸ Civ. Code, § 1798.90.55, subd. (a).

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profiling, the Board encourages increased openness and disclosures by agencies in regard to how they are using their ALPR systems and data. It is also critical that jurisdictions provide ongoing opportunities for the public to comment on the use of ALPR systems or ALPR data, particularly those jurisdictions that are considering expanding the purposes for which they are using ALPR systems or data, or beginning to use new or additional ALPR system functionalities.

3. ALPR Systems and Racial and Identity Profiling and Disparities

As noted above, in its 2026 Report, the Board expressed concern that law enforcement ALPR systems can be deployed to target racial and other identity groups and ALPR databases queried in racially biased ways.⁸⁹

Since that report was published, most of the critical commentary about ALPR systems have been directed at concerns about costs, privacy, over-surveillance, data sharing/security, and lack of transparency, rather than concerns about racial profiling or disparities.⁹⁰ Nevertheless, concerns about disproportionate placement of ALPR cameras in certain communities continue to be raised.⁹¹

4. California ALPR Data and Racial Profiling Connection to Immigration Enforcement

In the 2026 RIPA Report, the Board expressed concern that ALPR data might be shared for immigration enforcement purposes.⁹² Since then, public reporting has brought greater attention to the continuing concerns with such sharing, including sharing of California agencies' data that might occur through non-California state or local agencies that are assisting in immigration enforcement.⁹³

Where such sharing happens, information — such as the places to which an individual has traveled — can be used to build profiles like those described above, which are also based on race or national origin. These profiles could then be used to identify individuals to be stopped and questioned about their citizenship and immigration status.⁹⁴ California agencies' ALPR data

⁸⁹ 2026 Annual RIPA Board Report, 120-122.

⁹⁰ See sources cited at footnote xxx [this is the note a few down, starting with Finn Hertnett article].

⁹¹ Coleman, Pasadena Now, Residents Raise Privacy, Equity Concerns Over Police Use of Flock Cameras (Mar. 20, 2026) <<https://pasadenanow.com/main/residents-raise-privacy-equity-concerns-over-police-use-of-flock-cameras>> [as of XX, 2026] (resident commented that concentrating cameras in certain city districts “reinforces patterns of overpolicing” and questioned why cameras were “placed in historically working class communities that are immigrant communities that have been heavily targeted by ICE”).

⁹² 2026 Annual RIPA Report, 122-123.

⁹³ Koebler, 404 Media, Florida's Wildlife Cops are Searching Thousands of Flock Records for ICE (Apr. 2, 2026) (“The practice highlights how ICE, which does not have a contract with Flock, continues to get access to Flock’s AI-powered license plate scanning cameras through local and state police, and often in ways that are unusual, unexpected, and difficult for the public to track or hold the agency accountable for”); Hartnett, *The Nationwide Revolt Against Flock Safety Cameras* (Feb. 27, 2026) *The New Republic* <<https://tinyurl.com/ubpwmptd>> [as of XX, 2026]; Pinsof, Electronic Frontier Foundation, *San Jose Can Protect Immigrants by Ending Flock Surveillance System* (Feb. 12, 2026) <<https://tinyurl.com/nsfmmrv3>> [as of XX, 2026]; *Secure Justice, Blog, Why Are The Alameda County Sheriff And SFPD Sharing So Much Data With 287(g) Agencies?* <<https://tinyurl.com/56awfeza>> (Dec. 7, 2025) [as of XX, 2026]; see also Wardwell, Politico, Liberal Towns Backtrack on License Plate Trackers Amid Concerns About Privacy — and Trump (Dec. 1, 2025) <<https://www.politico.com/news/2:025/11/30/license-plate-trackers-pushback-00670550>> [as of XX, 2026].

⁹⁴ See *Noem v. Vasquez Perdomo* (S. Ct. No. 25A) Application to Stay the Order Issued by the United States District Court for the Central District of California and Request for an Immediate Administrative Stay (Jul. 11, 2025) 2025 **DRAFT REPORT – PENDING EDITING AND REVIEW**

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could also be used to help locate individuals who have been identified for immigration enforcement purposes based partly on their race or national origin. In other words, if shared for immigration enforcement purposes, California ALPR data could contribute to racial profiling (and unlawful detentions) in immigration enforcement taking place in the State of California.⁹⁵ The Board does not have specific evidence that this practice has been happening to date, but it is an area of concern because of past access to ALPR data for immigration enforcement purposes, evidence of ALPR data being used to identify locations where individuals travel for immigration enforcement purposes,⁹⁶ and evidence that race, including in combination with location, has been considered as a factor in determining when authorities claim to have “reasonable suspicion” to stop a person for immigration enforcement purposes in parts of California.⁹⁷

In view of the foregoing, and because California law already restricts the sharing of ALPR data with non-California entities⁹⁸ and restricts immigration enforcement assistance⁹⁹ — California jurisdictions that use ALPR systems should take all reasonable measures to ensure their ALPR data is not being made available for immigration enforcement purposes or contributing to racial and identity profiling in California.

WL 2323447 (U.S. government brief to U.S. Supreme Court defending immigration authorities’ consideration of a person’s apparent race, and whether the person speaks Spanish, as factors in deciding whether there is reasonable suspicion to stop people in the Central District of California to investigate their immigration status, including in combination with a person’s presence at particular types of locations (e.g., bus stop, car wash, tow yard, day laborer pick up site, agricultural site, etc., or the type of work a person does).

⁹⁵ Cf. Gov. Code, § 7284.2, subd. (e) (State and local participation in federal immigration enforcement programs raises constitutional concerns that that California residents could be detained in violation of the Fourth Amendment to the U.S. Constitution and targeted on the basis of race or ethnicity in violation of the Equal Protection Clause). Sharing of California agencies’ ALPR data for immigration enforcement purposes is problematic (and unlawful) for other reasons too. Under California law, including the California Values Act, California law enforcement officers are generally restricted from assisting in immigration enforcement, **subject to exceptions, including for individuals convicted of** certain serious or violent crimes. (See Gov. Code, §§ 7282.5, 7284.6.) And California law restricts California law enforcement agencies from sharing their ALPR data with federal agencies for immigration enforcement purposes. (Civ. Code, §§ 1798.90.5, subd. (f), 1798.90.55, subd. (b); California Department of Justice, Division of Law Enforcement, Information Bulletin No. 2023-DLE-06, *California Automated License Plate Reader Data Guidance* (Oct. 27, 2023).) In light of its mandate to work for the elimination of racial and identity profiling, however, the Board is focused on the nexus between the sharing of California agencies’ ALPR data and racial profiling, rather than enforcement of the Values Act or the ALPR data-sharing law.

⁹⁶ See, e.g., Byron Tau and Garance Burke, AP, *Border Patrol is Monitoring US Drivers and Detaining Those With ‘Suspicious’ Travel Patterns* (Nov. 20, 2025) < <https://tinyurl.com/3h2zz4dd> > [as of XX, 2026] (reporting that U.S. Customs and Border Protection has been using ALPR data from various jurisdictions to identify and detain people whose travel patterns it deems suspicious); Jason Koebler and Joseph Cox, *ICE Taps Into Nationwide AI-Enabled Camera Network, Data Shows*, 404 Media (May 27, 2025) < <https://tinyurl.com/msjhxmys> > [as of XX, 2026] (reporting that ICE was getting “side door” access to other jurisdictions’ ALPR data by having local and state police perform searches in their ALPR databases or even nationwide ALPR databases).

⁹⁷ See, e.g., *Noem v. Vasquez Perdomo* (S. Ct. No. 25A) Application to Stay the Order Issued by the United States District Court for the Central District of California and Request for an Immediate Administrative Stay (Jul. 11, 2025) 2025 WL 2323447 (U.S. government brief to U.S. Supreme Court defending immigration authorities’ consideration of a person’s apparent race, and whether the person speaks Spanish, as factors in deciding whether there is reasonable suspicion to stop people in the Central District of California to investigate their immigration status, including in combination with a person’s presence at particular types of locations (e.g., bus stop, car wash, tow yard, day laborer pick up site, agricultural site, etc., or the type of work a person does).

⁹⁸ Civ. Code, §§ 1798.90.5, subd. (f), 1798.90.55, subd. (b).

⁹⁹ Gov. Code, § 7282.5.

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Under existing California law, ALPR operators and end-users must “[m]aintain reasonable security procedures and practices, including operational, administrative, technical, and physical safeguards, to protect ALPR information from unauthorized access, destruction, use, modification, or disclosure.”¹⁰⁰ ALPR operators and end-users must implement a usage and privacy policy meeting specified minimum requirements to ensure the collection, use, maintenance, sharing, and dissemination of ALPR information “is consistent with respect for individuals’ privacy and civil liberties.”¹⁰¹ If they access or provide access to ALPR information, ALPR operators are also required to maintain records pertaining to accessing or providing access to ALPR information, as specified in the law.¹⁰²

As noted, California agencies are prohibited from sharing their ALPR information with non-California agencies.¹⁰³ Notwithstanding that rule, agencies can help protect their data by becoming as knowledgeable as possible about how their systems are configured with regard to who is able to access/run searches on their data. Agencies should recognize that even where federal authorities are not themselves able to run a search on a California agency’s data, they may be able to have another entity that has been able to gain such access run the search for them.¹⁰⁴ Another measure that can be taken is to conduct regular audits to identify and log instances in which it appears that searches may have been run on the agency’s data for immigration enforcement purposes.¹⁰⁵ Agencies can also record even just the facts of requests for such searches being made. Agencies can inform and remind their employees about the law against California agencies sharing ALPR data with non-California entities. Employees can be trained, for example, that they are not to run searches on their agency’s ALPR data for anyone other than another California public agency, assuming the agency allows even that. Agencies can also choose to place more restrictions than they currently have on who within the agency is able to access the agency’s ALPR data. An agency can also choose to shorten the amount of time it retains ALPR data.¹⁰⁶

B. Technology-Assisted Body Worn Camera Footage Review

When used responsibly, technology-assisted police body-worn camera footage review, including platforms marketed to law enforcement agencies, has shown that it holds significant promise to help reduce racial and identity profiling and disparities and to improve racial and identity group sensitivity in law enforcement. To maximize its potential, camera footage and technological tools to review would need to be available for use outside of law enforcement

¹⁰⁰ Civ. Code, §§ 1798.90.51, subd. (a) (operators), 1798.90.53, subd. (a) (end-users). An “ALPR operator” is “a person that operates an ALPR system,” and, in general, an “ALPR end user is a person that accesses or uses an ALPR system.” *Id.*, § 1798.90.5, subds. (a), (c).

¹⁰¹ Civ. Code, §§ 1798.90.51, subd. (b) (operators), 1798.90.53, subd. (a) (end-users).

¹⁰² Civ. Code, § 1798.90.52.

¹⁰³ Civ. Code, § 1798.90.55, subd. (b); Civ. Code, § 1798.90.5, subd. (f) (definition of “public agency”).

¹⁰⁴ See Center for Human Rights, University of Washington, *Leaving the Door Wide Open: Flock Surveillance Systems Expose Washington Data to Immigration Enforcement* (Oct. 21, 2025) <<https://tinyurl.com/mr2xf33n>> [as of XX, 2026].

¹⁰⁵ See, e.g., Oxnard Police, Oxnard Police Department Suspends Use of Flock Safety Automated License Plate Readers (Feb. 27, 2026) <<https://tinyurl.com/yzjaw849>> [as of XX, 2026] (reporting that audits revealed that federal law enforcement agencies had been able to run searches in city’s ALPR data); City of Mountainview, Council Report, “Automated License Plate Reader Contract” (Feb. 24, 2026), 14 <<https://tinyurl.com/4fim2v932>> [as of XX, 2026] (same).

¹⁰⁶ Civ. Code, § 1798.90.51, subd. (b)(2)(G) (giving ALPR operator discretion how long to retain ALPR information); Civ. Code, § 1798.90.51, subd. (b)(2)(G) (giving ALPR end-user discretion how long to retain ALPR information).

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agencies and individual cases.¹⁰⁷ It is also important to recognize and guard against the risk of the technology being used disproportionately against certain racial or other identity groups as a surveillance or investigatory tool. More generally, the interests in privacy and transparency that are implicated by using technology to review body-worn camera footage collections must be addressed. Costs (including opportunity costs) to state and local jurisdictions must be considered as well. The decision to have a law enforcement agency purchase and use a technology-assisted review platform should include a public hearing with the opportunity for community input.

1. Background

A body-worn camera (BWC) is a small, wearable device that records video and audio. The device's key components include a camera, a microphone, and an internal memory or storage cards for storing recorded footage.¹⁰⁸ Police BWCs record officers' interactions with the public.¹⁰⁹ Recorded footage is typically stored on secure servers or cloud-based platforms.¹¹⁰ Law enforcement agency usage of body worn cameras is widespread and expected to increase.¹¹¹

¹⁰⁷ See, e.g., Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Mary D. Fan, *Body Camera, Big Data, and Police Accountability* (2018) 43 Law & Social Inquiry 1236 <<https://tinyurl.com/mucx4anv>> [as of XX, 2026].

¹⁰⁸ Morris, *What is a Body Worn Camera?*, AEANET.org (Nov. 25, 2025) <https://www.aeanet.org/what-is-a-body-worn-camera/#google_vignette> [as of XX, 2026]; Sogade, *Body-Worn Camera Footage Retention and Release: Developing an Intermediate Framework for Public Access in a New Affirmative Disclosure-Driven Transparency Movement*, 122 Colum. L. Rev. 1729, 1734 & fn. 14 (Oct. 2022) <<https://tinyurl.com/y7c37ewf>> [as of XX, 2026].

¹⁰⁹ See, e.g., Kevin Strom, RTI International Police Executive Research Forum, *Research on the Impact of Technology on Policing Strategy in the 21st Century, Final Report* (May 2016), 3-4, <https://nij.ojp.gov/library/publications/research-impact-technology-policing-strategy-21st-century-final-report> [as of XX, 2026]; Bureau of Justice Assistance, U.S. Department of Justice, *Body-Worn Camera Frequently Asked Questions* (2015), 1. <https://nij.ojp.gov/library/publications/research-impact-technology-policing-strategy-21st-century-final-report> [as of XX, 2026]; Bureau of Justice Assistance, U.S. Department of Justice, *Body-Worn Camera Frequently Asked Questions* (2015), 1. <https://nij.ojp.gov/library/publications/research-impact-technology-policing-strategy-21st-century-final-report> [as of XX, 2026]; Bureau of Justice Assistance, U.S. Department of Justice, *Body-Worn Camera Frequently Asked Questions* (2015), 1. <https://nij.ojp.gov/library/publications/research-impact-technology-policing-strategy-21st-century-final-report> [as of XX, 2026]; Bureau of Justice Assistance, U.S. Department of Justice, *Body-Worn Camera Frequently Asked Questions* (2015), 1.

¹¹⁰ Morris, *What is a Body Worn Camera?* AEANET.org (Nov. 25, 2025) <https://www.aeanet.org/what-is-a-body-worn-camera/#google_vignette> [as of XX, 2026]; Sogade, *Body-Worn Camera Footage Retention and Release: Developing an Intermediate Framework for Public Access in a New Affirmative Disclosure-Driven Transparency Movement*, 122 Colum. L. Rev. 1729, 1735 (Oct. 2022) <<https://tinyurl.com/y7c37ewf>> [as of XX, 2026].

¹¹¹ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2250 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (reporting that as of 2020, 79% of all local police officers worked in departments that used BWCs and that use is accelerating among sheriffs and federal law enforcement agencies); Lyons, *California Highway Patrol Lags Local Police, Other States in Officer Body Cams*, Cal Matters (Mar. 3, 2022) <<https://calmatters.org/justice/2022/03/california-highway-patrol-body-cams/>> [as of XX, 2026] (reporting that CalMatters had queried more than a dozen of California's largest police and sheriff's departments and found that nearly all had at least some body cameras); Byrhonda Lyons, *California Highway Patrol Fell Behind Other Agencies on Body Cams. Now it's Trying to Fix That*, Cal Matters (Jul. 10, 2025) <<https://calmatters.org/justice/2025/07/chp-body-cams/>> [as of XX, 2026] (reporting that 7,600 California Highway Patrol officers were expected to receive BWCs by March 2026). For additional background on police use of BWCs, see Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (discussing

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Projected benefits of police BWCs have included improving public perception of law enforcement legitimacy, improving transparency and accountability, creating training opportunities, and monitoring the success of policing strategies.¹¹² Studies have shown some apparent effects in terms of BWC use resulting in reductions in use-of-force incidents and civilian complaints about law enforcement encounters.¹¹³ Another hoped-for benefit of police BWCs has been to help reduce racially biased policing, including both intentional disparate treatment and disparate treatment caused by implicit bias.¹¹⁴ For example, in its 2025 Report, the RIPA Board recommended requiring that BWC footage be used in POST racial and identity profiling training.¹¹⁵ Information showing that police use of BWCs correlates with reduced civilian complaints might also suggest that police use of BWCs correlates with a lower incidence of perceived biased policing.

There have been critiques that police use of BWCs has not lived up to its promise of improved accountability and transparency. Common criticisms have focused on law enforcement agencies' control over how and when, if ever, BWC footage is released outside the agency and police

how police BWC use and footage has been largely regulated by police and discussing how police have used BWC footage); Murphy, *Is it Recording?—Racial Bias, Police Accountability, and the Body-Worn Camera Activation Policies of the Ten Largest Metropolitan Police Departments in the USA*, 9 Colum. J. of Race and L. 141 (2018) <<https://journals.library.columbia.edu/index.php/cjrl/article/view/2238>> [as of XX, 2026] (discussing different policies regarding when officers activate their BWCs); Strom, RTI International Police Executive Research Forum, *Research on the Impact of Technology on Policing Strategy in the 21st Century, Final Report* (May 2016), 3-4, 4-13 <<https://nij.ojp.gov/library/publications/research-impact-technology-policing-strategy-21st-century-final-report>> [as of XX, 2026] (general background).

¹¹² See, e.g., Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024), 3-4 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026]; Chapman, *Body-Worn Cameras: What the Evidence Tells Us*, National Institute of Justice (Jan. 2019), 1-2 <<https://nij.ojp.gov/topics/articles/body-worn-cameras-what-evidence-tells-us>> [as of XX, 2026]; see also Stoughton, *Police Body-Worn Cameras*, 96 N. Car. L. Rev. 1363, 1378-1399 (2018) <<https://tinyurl.com/ja29sej4>> [as of XX, 2026] (discussing potential symbolic, behavioral, and informational benefits from having police use BWCs); Miller et al., Police Executive Research Forum, *Implementing a Body-Worn Camera Program: Recommendations and Lessons Learned* (2014), 5-9.

¹¹³ See, e.g., Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024), 4 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026]; Corley, *Body-Worn Camera Research Shows Drop In Police Use Of Force*, NPR (Apr. 26, 2021) <<https://www.npr.org/2021/04/26/982391187/study-body-worn-camera-research-shows-drop-in-police-use-of-force>> [as of XX, 2026]; 2024 Annual RIPA Report, 197-198 & fn. 1009-1014.

¹¹⁴ See, e.g., Murphy, *Is it Recording?—Racial Bias, Police Accountability, and the Body-Worn Camera Activation Policies of the Ten Largest Metropolitan Police Departments in the USA*, 9 Colum. J. of Race and L. 141, 171-173 (2018) <<https://journals.library.columbia.edu/index.php/cjrl/article/view/2238>> [as of XX, 2026]; Stoughton, *Police Body-Worn Cameras*, 96 N. Car. L. Rev. 1363, 1370, 1375 (2018) <<https://tinyurl.com/ja29sej4>> [as of XX, 2026]; Murphy, *Is it Recording?—Racial Bias, Police Accountability, and the Body-Worn Camera Activation Policies of the Ten Largest Metropolitan Police Departments in the USA*, 9 Colum. J. of Race and L. 141, 144-145, 147-158, 170, 171-172 (2018) <<https://journals.library.columbia.edu/index.php/cjrl/article/view/2238>> [as of XX, 2026]; see also Southerland, *The Intersection of Race and Algorithmic Tools in the Criminal Justice System*, 80 Md. L. Rev. 487, 548 (2021) <<https://tinyurl.com/2p9udusz>> [as of XX, 2026] (“Body-worn cameras were widely adopted to curtail police violence against communities of color”).

¹¹⁵ 2025 RIPA Board Report, 13; see *id.* at 12, 128, 131 (noting researchers' recommendation that BWC footage be used to train officers and examine their behavior in the field as part of efforts to address implicit bias and reduce disparities).

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control over when BWCs are turned on (or activated).¹¹⁶ Another critique is that police BWC use has drifted toward a technology geared towards criminal investigations.¹¹⁷ There is concern that this drift will be intensified by the use of police BWCs in conjunction with other technologies, including surveillance technologies, to increase law enforcement surveillance over civilians and the resulting intrusions into their lives. In addition, some law enforcement stakeholders have been critical of police BWCs on the ground that they surveil law officers, can intrude on officer privacy, and might result in decreased officer morale and more difficulty in recruiting and retaining officers.

2. Emergence of Technology-Assisted BWC Review

The vast amount of police BWC footage that exists offers a trove of information that could be used to learn about and improve policing through review and analysis.¹¹⁸ But in general, the sheer volume of BWC footage makes manual review of more than a small fraction of existing footage infeasible.¹¹⁹ Manual review also lacks the ability to detect certain linguistic and behavioral patterns that occur across encounters between police and civilians.¹²⁰ Without the capacity to review and analyze footage on a large scale and in depth, the ability to realize BWCs'

¹¹⁶ See, e.g., Umansky, *The Failed Promise of Police Body Cameras*, New York Times (Dec. 13, 2023) <<https://www.nytimes.com/2023/12/13/magazine/police-body-cameras-miguel-richards.html>> [as of XX, 2026].

¹¹⁷ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2252-2253 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (“[B]ecause rules regarding BWCs have been largely left to police, law enforcement has transformed BWCs into a criminal investigative tool—one that raises serious potential privacy concerns.[] With recent technological advances, police now have the option, often unregulated by law, to add AI analytics capabilities, such as real-time search, facial recognition, and license-plate recognition.”) (footnote omitted).

¹¹⁸ See, e.g., Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 7 <<https://tinyurl.com/v33cu597>> [as of XX, 2026]; Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2255, 2259, 2284-2285 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Lasnier, *Stanford Summit Explores AI's Role in Policing Reform*, Stanford Report (Oct. 23, 2024)

<<https://news.stanford.edu/stories/2024/10/summit-explores-ai-s-role-in-policing-reform>> [as of XX, 2026]; Policing Project, New York University School of Law, *Rethinking Response Part Two: AI to Analyze Body Worn-Camera Footage* <<https://tinyurl.com/5n6ha2t5>> [as of XX, 2026]; Fan, *Body Camera, Big Data, and Police Accountability* (2018) 43 Law & Social Inquiry 1236 <<https://tinyurl.com/mucx4anv>> [as of XX, 2026].

¹¹⁹ See, e.g., Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2253, 2257-2259 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Lasnier, *Stanford Summit Explores AI's Role in Policing Reform*, Stanford Report (Oct. 23, 2024) <<https://news.stanford.edu/stories/2024/10/summit-explores-ai-s-role-in-policing-reform>> [as of XX, 2026]; Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024) <<https://tinyurl.com/5ccffev>> [as of XX, 2026]; Sisson, *AI Was Supposed to Make Bodycams Better. What Happened?*, MIT Technology review (Apr. 16, 2024)

<<https://tinyurl.com/mpz8n6jy>> [as of XX, 2026]; Farooq, *Police Departments Are Turning to AI to Sift Through Millions of Hours of Unreviewed Body-Cam Footage*, ProPublica (Feb. 2, 2024)

<<https://www.propublica.org/article/police-body-cameras-video-ai-law-enforcement>> [as of XX, 2026]. Jany, *AI Could Become Answer to Studying Bodycam Footage*, Los Angeles Times (Nov. 19, 2023); Peterson, *How Can Body Worn Cameras Maximize Police Accountability: New Analytic Tools Might be the Answer*, CNA (Mar. 31, 2023) <<https://tinyurl.com/recxc4t>> [as of XX, 2026].

¹²⁰ See, e.g., Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 8 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

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vast potential has been significantly limited, including with regard to using BWCs to address biased policing.¹²¹

However, speech recognition technology and continuing advances in artificial-intelligence (AI)-driven analytics have made it possible to automate and expand the review and analysis of large volumes of police BWC footage.¹²² Automatic speech recognition tools convert BWC audio into text transcripts, and then natural language processing and machine learning models examine the transcripts to identify patterns in language and run analytics.¹²³ Technologies can also be applied to review and analyze BWC audio and video, rather than just text.¹²⁴ Computational linguistic

¹²¹ See, e.g., Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 *Cardozo L. Rev.* 2247, 2253, 2255 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Lasnier, *Stanford Summit Explores AI's Role in Policing Reform*, Stanford Report (Oct. 23, 2024) <<https://news.stanford.edu/stories/2024/10/summit-explores-ai-s-role-in-policing-reform>> [as of XX, 2026]; Sisson, *AI Was Supposed to Make Bodycams Better. What Happened?*, MIT Technology review (Apr. 16, 2024) <<https://tinyurl.com/mpz8n6jy>> [as of XX, 2026]; see also Voight et al., *Language from Police Body Camera Footage Shows Racial Disparities in Officer Respect*, 114 *PNAS* No. 25 (Jun. 5, 2017) 6521 <<https://www.pnas.org/doi/abs/10.1073/pnas.1702413114>> [as of XX, 2026] (“Left unexamined are the common, everyday interactions between the police and the communities they serve.”).

¹²² See, e.g., Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026) 8 <<https://tinyurl.com/v33cu597>> [as of XX, 2026]; Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 *Cardozo L. Rev.* 2247, 2253-2254 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Lasnier, *Stanford Summit Explores AI's Role in Policing Reform*, Stanford Report (Oct. 23, 2024) <<https://news.stanford.edu/stories/2024/10/summit-explores-ai-s-role-in-policing-reform>> [as of XX, 2026]; Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024) <<https://tinyurl.com/5ccffevj>> [as of XX, 2026]; Peterson, *How Can Body Worn Cameras Maximize Police Accountability: New Analytic Tools Might be the Answer*, CNA (Mar. 31, 2023) 2-3, 5, 7 <<https://tinyurl.com/rcxc4t>> [as of XX, 2026]; Policing Project, New York University School of Law, *Rethinking Response Part Two: AI to Analyze Body Worn-Camera Footage* <<https://tinyurl.com/5n6ha2t5>> [as of XX, 2026].

¹²³ See, e.g., Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 1-2 <<https://tinyurl.com/v33cu597>> [as of XX, 2026]; Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 *Cardozo L. Rev.* 2247, 2161-2162 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024), 7 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026]; Sisson, *AI Was Supposed to Make Bodycams Better. What Happened?*, MIT Technology review (Apr. 16, 2024) <<https://tinyurl.com/mpz8n6jy>> [as of XX, 2026]; Peterson, *How Can Body Worn Cameras Maximize Police Accountability: New Analytic Tools Might be the Answer*, CNA (Mar. 31, 2023) <<https://tinyurl.com/rcxc4t>> [as of XX, 2026].

¹²⁴ Srbínovska et al., *Towards AI-Driven Policing: Interdisciplinary Knowledge Discovery from Police Body-Worn Camera Footage* (Jun. 19, 2025) <<https://arxiv.org/abs/2504.20007>> [as of XX, 2026] (introducing a framework demonstrating the potential of combining AI-driven audio, text, and image processing with advanced AI techniques for knowledge discovery from BWC footage); Peterson, *How Can Body Worn Cameras Maximize Police Accountability: New Analytic Tools Might be the Answer*, CNA (Mar. 31, 2023) <<https://tinyurl.com/rcxc4t>> [as of XX, 2026]; Camp et al., *The Thin Blue Waveform: Racial Disparities in Officer Prosody Undermine Institutional Trust in the Police*, 121 *Journal of Personality and Social Psychology: Attitudes and Social Cognition* 1157 (2021); Voight et al., *Language from Police Body Camera Footage Shows Racial Disparities in Officer Respect*, 114 *PNAS* No. 25 (Jun. 5, 2017), 6525 <<https://www.pnas.org/doi/abs/10.1073/pnas.1702413114>> [as of XX, 2026]; see Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site*

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methods are applied as part of some analyses.¹²⁵ To date, there have been several different types and applications of technology-assisted BWC footage review. Again, it should be noted that the Board is not endorsing any particular product(s) and is relying on publicly available information.

a. Technologies Marketed to Law Enforcement

Some companies market products to law enforcement agencies that will review and analyze the agency's BWC footage.¹²⁶ For example, one product automatically transcribes BWC footage audio, analyzes what has been said by officers and citizens, labels noteworthy events, and highlights select events for supervisor review.¹²⁷ The platform assigns event labels to identify events including, but not limited to, the officer introducing themselves, providing a reason for a stop, or attempting to de-escalate an interaction with a noncompliant person.¹²⁸ Using the community member's speech, the platform labels community members who are upset, noncompliant, or expressing gratitude.¹²⁹ The platform assigns labels to report, among other

Randomized Control Trial (Aug. 14, 2024) 5 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026] (noting some vendors' claims to products that analyze both video and audio).

¹²⁵ See, e.g., Lasnier, *Stanford Summit Explores AI's Role in Policing Reform*, Stanford Report (Oct. 23, 2024) <<https://news.stanford.edu/stories/2024/10/summit-explores-ai-s-role-in-policing-reform>> [as of XX, 2026]; Prabhakaran et al., *Detecting Institutional Dialog Acts in Police Traffic Stops*, 6 Transactions of the Association for Computational Linguistics 467, 478 (2018) <<https://aclanthology.org/Q18-1033/>> [as of XX, 2026]; Voight et al., *Language from Police Body Camera Footage Shows Racial Disparities in Officer Respect*, 114 Proceedings of the National Academy of Sciences No. 25 (Jun. 5, 2017) <<https://www.pnas.org/doi/abs/10.1073/pnas.1702413114>> [as of XX, 2026].

¹²⁶ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2253-2254 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024), 3 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026]; Peterson, Blog, *How Can Body Worn Cameras Maximize Police Accountability: New Analytic Tools Might be the Answer*, CNA (Mar. 31, 2023) <<https://tinyurl.com/rccxcc4t>> [as of XX, 2026]; Alcorn, *Police Body Cam Maker Unveils New Features it Hopes Will Curb Officer Misconduct*, CNN Business (Oct. 28, 2020) <<https://abc7.com/post/body-camera-police-bodycam-officer/7422266/>> [as of XX, 2026]; Axon, *Priority Ranked Video Audit Settings in Axon Performance*, <<https://www.axon.com/help/axon-performance/software/axon-performance/setup/priority-ranked-video-audit-settings.htm>> [as of XX, 2026]; TrustStat: The World's First Multimodal AI System for the Analysis of Body-Worn Camera Video <<https://www.polis-solutions.ai/services/truststat>> [as of XX, 2026].

Truleo, Virtual Field Training Officer <<https://truleo.co/virtual-fto>> [as of XX, 2026].

¹²⁷ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2261, 2265 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (describing the product as it existed in the Summer of 2024 and noting that it's constantly evolving); see Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024), 4, 7 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026] (describing the same product); Serrie and Daigle, *Police Departments Across America Using AI to Analyze Officers' Bodycam Video* (Jul. 18, 2023), Fox News <<https://www.foxnews.com/us/police-departments-america-using-ai-analyze-officers-bodycam-video>> [as of XX, 2026] (same); Sisson, *AI Was Supposed to Make Bodycams Better. What Happened?*, MIT Technology review (Apr. 16, 2024) <<https://tinyurl.com/mpz8n6jy>> [as of XX, 2026] (reporting that "Police chiefs or supervisors set up lists of keywords or events, get emails and notifications when the system detects these triggers, and then review the footage"); see also 2023 RIPA Board Report, 145 fn. 673 (describing this product as it existed in 2022).

¹²⁸ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2263 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹²⁹ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2263 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

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things, persons in crisis, stops where a person is not free to leave, traffic stops, searches, pursuits, and arrests.¹³⁰ Based on these labels, the platform will generate labels that single out positive and negative performances by police officers, which are flagged for supervisor review.¹³¹

The platform can be used toward the ends of enhancing accountability and public trust, surfacing positive officer-community member interactions to give credit for good work, serving as “a training and coaching tool, with a focus on promoting de-escalation and procedural justice in police-community interactions.”¹³² Preliminary evaluation and case studies of agencies using the product have shown an increase in product-measured “high professionalism,” a reduction in unprofessional behavior, and a suggestion that “the technology is associated with reductions in the use of force, civilian non-compliance, and increases in officer explanation.”¹³³ The product has been used by several California law enforcement agencies.¹³⁴

Another company whose product is used by police claims its “multimodal technology integrates several powerful AI tools to analyze police-community interactions,” using “computer vision” to analyze behavior, natural language processing, and “speech processing to analyze how people are talking to each other.”¹³⁵

These products marketed to police are products that law enforcement agencies could use to study and improve their policing, including as relates to racial and identity profiling and disparities.

b. Law Enforcement-Researcher Partnerships

Some researchers have worked with law enforcement agencies in voluntary partnerships, which points to further potential for law enforcement agencies to improve their policing as relates to racial profiling disparities. One university lab reportedly “works with police departments by reviewing BWC footage and providing recommendations. With the assistance of AI, researchers analyze video to track factors such as the race of officers and people involved, whether officers

¹³⁰ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2263 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹³¹ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2264 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹³² Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2266 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹³³ Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024), 3 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026]; University of South Carolina Department of Criminology and Criminal Justice, *Truleo Evaluation Experiment: Executive Summary* (Aug. 28, 2024) <<https://tinyurl.com/3sbsmube>> [as of XX, 2026].

¹³⁴ PR Newswire, *Anaheim Police to Deploy Body Camera Analytics* (Apr. 19, 2023)

<<https://www.prnewswire.com/news-releases/anaheim-police-to-deploy-body-camera-analytics-301802117.html>> [as of XX, 2026]; Police 1, *Torrance Police Department signs on to receive software for BWC review* (Mar. 2, 2023) <<https://www.police1.com/police-products/body-cameras/press-releases/torrance-police-department-signs-on-to-receive-software-for-bwc-review-LyqJVXkWokuKlqwN/>> [as of XX, 2026]; PR Newswire, *California Police Departments Aim to Improve Policing with Body Camera Analytics* (Jan. 24, 2022) <<https://www.prnewswire.com/news-releases/california-police-departments-aim-to-improve-policing-with-body-camera-analytics-301466017.html>> [as of XX, 2026].

¹³⁵ Polis, *TrustStat* <<https://www.polis-solutions.ai/services/truststat>> [as of XX, 2026]; see also Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2253 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Farooq, *Police Departments Are Turning to AI to Sift Through Millions of Hours of Unreviewed Body-Cam Footage*, ProPublica (Feb. 2, 2024) <<https://www.propublica.org/article/police-body-cameras-video-ai-law-enforcement>> [as of XX, 2026].

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explained their actions or commands, and whether force was used. AI then identifies correlations between these factors and the outcomes of each encounter. The Lab then shares its findings with police departments, helping to shape training standards and identify areas where policing practices can improve.”¹³⁶

The Los Angeles Police Department has reportedly partnered with university researchers “to develop a new AI-powered tool to examine footage from around 1,000 traffic stops and determine which officer behaviors keep interactions from escalating.”¹³⁷ A Stanford University research team reports that it has performed BWC footage analysis for two large California cities.¹³⁸

These partnerships hold out potential to learn information from BWC footage that can be used to try to reduce racial and identity profiling and disparities.

c. Research and Monitoring Applications¹³⁹

Other technology-assisted BWC footage review applications have been used to gain insights about policing that could be useful to addressing racial profiling and disparities, including studies conducted under the auspices of court-ordered remedial plans.

In one study using body-worn camera footage conducted under the auspices of monitoring a court-ordered settlement, researchers analyzed the respectfulness of police officer language toward White and Black community members during routine traffic stops. The study used computational linguistic methods that extracted levels of respect automatically from transcripts.¹⁴⁰ The study found that officers speak with consistently less respect toward Black versus White community members, even after controlling for the race of the officer, the severity of the infraction, the stop’s location of the stop, and the stops’ outcome.¹⁴¹ A follow-up study reviewed footage to determine that training had resulted in officers employing more of the

¹³⁶ Policing Project, New York University School of Law, Rethinking Response Part Two: AI to Analyze Body Worn-Camera Footage <<https://tinyurl.com/5n6ha2t5>> [as of XX, 2026]; see Washington State University, CSI Lab Site <<https://labs.wsu.edu/csi/>> [as of XX, 2026]; Washington State University, CSI Lab White Paper <<https://labs.wsu.edu/csi/white-paper/>> [as of XX, 2026] (describing the lab’s methodology and potential benefits); Farooq, *Police Departments Are Turning to AI to Sift Through Millions of Hours of Unreviewed Body-Cam Footage*, ProPublica (Feb. 2, 2024) <<https://www.propublica.org/article/police-body-cameras-video-ai-law-enforcement>> [as of XX, 2026] (reporting on the Lab’s work).

¹³⁷ Farooq, *Police Departments Are Turning to AI to Sift Through Millions of Hours of Unreviewed Body-Cam Footage*, ProPublica (Feb. 2, 2024) <<https://www.propublica.org/article/police-body-cameras-video-ai-law-enforcement>> [as of XX, 2026]; see Jany, *LAPD Would Delete Nearly 12 Million Body Camera Videos Under Proposed Policy Change*, Los Angeles Times (Jan. 29, 2026).

¹³⁸ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 6 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹³⁹ Some of the studies discussed here included elements of human review.

¹⁴⁰ Voight et al., *Language from police body camera footage shows racial disparities in officer respect*, 114 *Proceedings of the National Academy of Sciences* No. 25 (Jun. 5, 2017) <<https://www.pnas.org/doi/abs/10.1073/pnas.1702413114>> [as of XX, 2026];

¹⁴¹ Voight et al., *Language from police body camera footage shows racial disparities in officer respect*, 114 *Proceedings of the National Academy of Sciences* No. 25 (Jun. 5, 2017) <<https://www.pnas.org/doi/abs/10.1073/pnas.1702413114>> [as of XX, 2026]; See 2025 RIPA Board Report, 130-131 (discussing this study as part of discussion of using police BWC footage to train police).

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officer-communicated-respect techniques recommended for improving police-community interactions.¹⁴²

Researchers in another study used computational linguistics methods to analyze police BWC footage from 577 stops of Black drivers. The researchers found that “stops with escalated outcomes (those ending in arrest, handcuffing, or a search) diverge from stops without these outcomes in their earliest moments—even in the first 45 words spoken by the officer. In stops that result in escalation, officers are more likely to issue commands as their opening words to the driver and less likely to tell drivers the reason why they are being stopped.”¹⁴³

In another set of studies, researchers used traffic stops BWC footage to examine how officers communicate to drivers and whether racial disparities in officers’ communication erode institutional trust in the police, specifically considering officers’ tone of voice. The studies used technology to treat audio so that study participant reviewers were blind to the content of the officer’s words and their interlocutor’s race. Participants evaluated officers’ tone toward White (vs. Black) men more positively.¹⁴⁴ Participants were more likely to categorize officer speech as toward Black drivers as “*talking down*.”¹⁴⁵ The studies “converge[d] on the same finding: police officers communicated more respect, ease, and warmth toward the White men they stopped than they did toward Black men.”¹⁴⁶ The studies also revealed that participants with greater trust in the police rendered more positive judgments of officer prosody.¹⁴⁷ The researchers noted that BWC footage “could be used to analyze low-frequency but high-impact events that disproportionately impact communities of color, such as escalation [e.g., use of force].”¹⁴⁸

In another study, researchers applied computational dialog methods to police BWC footage to model conversations between police officers and community members in traffic stops and developed a labeling scheme for police speech during traffic stops and a tagger to detect institutional dialog acts (reasons for stops, searches, offering help) from transcribed text.¹⁴⁹ The researchers developed speech recognition and segmentation algorithms to detect these acts at the

¹⁴² Camp et al., *Leveraging Body-Worn Camera Footage to Assess the Effects of Training on Officer Communication During Traffic Stops* (Sept. 2024) 3 Proceedings of the National Academy of Sciences Nexus 1 <<https://academic.oup.com/pnasnexus/article/3/9/pgae359/7756556>> [as of XX, 2026].

¹⁴³ Rho et al., *Escalated Police Stops of Black Men are Linguistically and Psychologically Distinct in Their Earliest Moments*, 120 Proceedings of the National Academy of Sciences (May 30, 2023), 1, 5 <<https://tinyurl.com/mpj6fje5>> < [as of XX, 2026].

¹⁴⁴ Camp et al., *The Thin Blue Waveform: Racial Disparities in Officer Prosody Undermine Institutional Trust in the Police*, 121 Journal of Personality and Social Psychology: Attitudes and Social Cognition 1157, 1161 (2021) <<https://tinyurl.com/mr24sm62>> [as of XX, 2026].

¹⁴⁵ Camp et al., *The Thin Blue Waveform: Racial Disparities in Officer Prosody Undermine Institutional Trust in the Police*, 121 Journal of Personality and Social Psychology: Attitudes and Social Cognition 1157, 1161 (2021) <<https://tinyurl.com/2yhpfv3k>> [as of XX, 2026].

¹⁴⁶ Camp et al., *The Thin Blue Waveform: Racial Disparities in Officer Prosody Undermine Institutional Trust in the Police*, 121 Journal of Personality and Social Psychology: Attitudes and Social Cognition 1157, 1163 (2021) <<https://tinyurl.com/2yhpfv3k>> [as of XX, 2026].

¹⁴⁷ Camp et al., *The Thin Blue Waveform: Racial Disparities in Officer Prosody Undermine Institutional Trust in the Police*, 121 Journal of Personality and Social Psychology: Attitudes and Social Cognition 1157, 1164 (2021) <<https://tinyurl.com/2yhpfv3k>> [as of XX, 2026].

¹⁴⁸ Camp et al., *The Thin Blue Waveform: Racial Disparities in Officer Prosody Undermine Institutional Trust in the Police*, 121 Journal of Personality and Social Psychology: Attitudes and Social Cognition 1157, 1168 (2021) <<https://tinyurl.com/2yhpfv3k>> [as of XX, 2026].

¹⁴⁹ Prabhakaran et al., *Detecting Institutional Dialog Acts in Police Traffic Stops*, 6 Transactions of the Association for Computational Linguistics 467, XX (2018) <<https://aclanthology.org/Q18-1033/>> [as of XX, 2026] (description from abstract).

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stop level from raw camera audio.¹⁵⁰ The study “demonstrate[d] that the dialog structures produced by our tagger could reveal whether officers follow law enforcement norms like introducing themselves, explaining the reason for the stop, and asking permission for searches.”¹⁵¹ The researchers noted that “knowing which requests the officer makes, whether and when they introduce themselves or explain the reason for the stop is a novel way to measure *procedural justice*; a set of fairness principles recommended by the President’s Task Force on 21st Century Policing,[] and endorsed by police departments across the U.S.”¹⁵² The authors further noted that their model allows them to study whether police training has an effect on the kinds of conversations that police officers have with the community.¹⁵³

Another research study was done in connection with litigation challenging the New York Police Department’s stop-and-frisk practices, which the court found, among other things, revealed a pattern of Fourth Amendment violations and racial profiling during stops.¹⁵⁴ As part of its remedies, the court ordered the use of BWCs, and approved research studies designed to leverage the footage.¹⁵⁵ One of the studies used “AI tools and techniques – including machine learning and natural language processing – to computationally analyze BWC recordings and identify key indicators of constitutional compliance in what NYPD officers say and how they say it during encounters with civilians.”¹⁵⁶ Among other things, the study “analyze[d] the NYPD’s consent search practices for compliance with the Fourth Amendment, which requires that consent be voluntary, an inquiry that turns in part on the language officers use.”¹⁵⁷ To assess compliance with the Fourteenth Amendment to the U.S. Constitution’s discrimination prohibition, “the study analyze[d] differences in officer language during encounters with civilians of different races and ethnicities, from low-level interactions to stops and searches.”¹⁵⁸ The study discussed how machine learning models could be used to raise the rate of identification of undocumented

¹⁵⁰ Prabhakaran et al., *Detecting Institutional Dialog Acts in Police Traffic Stops*, 6 Transactions of the Association for Computational Linguistics 467, XX (2018) <<https://aclanthology.org/Q18-1033/>> [as of XX, 2026] (description from abstract).

¹⁵¹ Prabhakaran et al., *Detecting Institutional Dialog Acts in Police Traffic Stops*, 6 Transactions of the Association for Computational Linguistics 467, 467 (2018) <<https://aclanthology.org/Q18-1033/>> [as of XX, 2026] (description from abstract).

¹⁵² Prabhakaran et al., *Detecting Institutional Dialog Acts in Police Traffic Stops*, 6 Transactions of the Association for Computational Linguistics 467, 467 (2018) <<https://aclanthology.org/Q18-1033/>> [as of XX, 2026].

¹⁵³ Prabhakaran et al., *Detecting Institutional Dialog Acts in Police Traffic Stops*, 6 Transactions of the Association for Computational Linguistics 467, 478 (2018) <<https://aclanthology.org/Q18-1033/>> [as of XX, 2026].

¹⁵⁴ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 1 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹⁵⁵ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 1 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹⁵⁶ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 1 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹⁵⁷ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 1 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹⁵⁸ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 1-2 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

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stops.¹⁵⁹ The study found that “unreported stops in particular show the largest racial disparities in language use, such that relative to properly documented stops, unreported stops of Black and Hispanic civilians display substantially more linguistic characteristics of constitutional non-compliance.”¹⁶⁰ In addition, the study “reveal[ed] racial disparities in officer language in consent searches including greater use of ambiguous ‘[do you] mind’ questions in encounters with Black civilians and more commands in encounters with Black and Hispanic civilians.”¹⁶¹ The study also found that “reported encounters of Black and Hispanic individuals” that were not reported as being detentive stops — i.e., stops where the civilian is free to go — were more linguistically similar to stops that were more likely to be detentive stops.¹⁶²

These studies evidence the potential that technology-assisted BWC footage review has to study the existence and potential sources of racial and identity profiling and to contribute to the identification, development, and implementation of potential solutions.

3. For The (Potential) Future: Using Technology-Assisted BWC Footage Analysis in the Effort to Reduce Racially Biased Policing

a. Research Demonstrates Technology-Assisted Reviews and Analysis Can Be Used to Help Bring About Reductions in Racial and Identity Profiling¹⁶³

The future campaign to reduce racial and identity profiling and disparities in California might include much greater use of technology-assisted BWC footage review.

Research demonstrates that analysis of BWC footage could show possible instances or patterns of biased policing, including racial profiling and implicit bias, and could show patterns of officer speech or interactions, or events, occurring during stops that have an adversely disparate impact on certain groups.¹⁶⁴ Researchers have used technology-assisted BWC footage review to identify

¹⁵⁹ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 2-3 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹⁶⁰ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 3-4, 42-43 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹⁶¹ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 4-5, 73, 64 <<https://tinyurl.com/v33cu597>> [as of XX, 2026] (“Implicit search requests—and confusing framing—are most likely to occur in consent search requests of Black and Hispanic civilians and are markedly less common in requests of White civilians. Alongside our findings on ‘stop-like’ interactions in the first aim, they suggest a more investigatory tenor to NYPD encounters with communities of color”).

¹⁶² Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 2, 5, 41, 44, 66, 67, 73 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹⁶³ This Report neither endorses nor disapproves law enforcement use of BWCs but rather takes their use by many California law enforcement agencies as a given for present purposes.

¹⁶⁴ See, e.g., Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 67 <<https://tinyurl.com/v33cu597>> [as of XX, 2026] (“these findings [from technology-assisted BWC footage review] extend the Monitor’s prior analyses, which showed racial disparities in how often stops occur, by demonstrating disparities in how encounters unfold in practice. These patterns point to differential treatment reflected in officer language and, while they do not establish discriminatory intent, they are consistent with the concerns about racially disparate policing that animate the Court’s remedial orders.”); New York Times, **DRAFT REPORT – PENDING EDITING AND REVIEW**

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training opportunities related to biased policing, including the revealing of practices that have racially disparate impacts, to assess the extent to which officers are implementing training and policies related to biased policing.¹⁶⁵ Further, the available research demonstrates that law enforcement agencies could use BWC analysis to evaluate the extent to which certain reforms or training, when implemented, may be effective in reducing racial and identity group profiling or disparities.¹⁶⁶

Even where no information suggesting disparate treatment is found, analyses showing what types of speech or actions correlate with stops elevating to more intrusive actions — e.g., search requests, searches, use of force, ordering car occupants out of the car, ordering pedestrians to sit down, etc. — can be used to inform strategies for reducing the incidence of such actions, which may be experienced at disproportionately high rates by certain racial, ethnic, or other identity groups. Technology-assisted BWC footage analysis might also be able to help police and researchers learn more about what causes perceptions of biased policing, which perceptions are also important to understand and address.¹⁶⁷

In addition, in the RIPA context, a concern raised by law enforcement regarding the use of stop data alone to identify patterns of potential racial bias in the use of force is that such studies do not measure the origin of the force — i.e., was the force proactive by the officer or reactive to a

White Drivers Got a Warning. Latino Drivers Got Detained., (Apr. 29, 2026) (reporting that a *New York Times* review of 50 hours of Immigration and Customs Enforcement BWC footage from a single night in Nashville, Tennessee revealed “a pattern of overt racial profiling”); see also 2023 RIPA Board Report, 91 (discussing Los Angeles Office of the Inspector General audit of Los Angeles Police Department stop data and BWC footage that revealed that some portion of racial disparities observed in stops and actions taken following stops were the result of pretext stops); *id.* at 145 (“Analysis of body-worn camera footage is also a method to detect and prevent problematic practices through review of aggregated data.[] Body-worn camera footage can reveal recurring challenges and patterns across cases.”) (footnote omitted).

¹⁶⁵ See, e.g., Julian R. Murphy, Note, *Is it Recording?—Racial Bias, Police Accountability, and the Body-Worn Camera Activation Policies of the Ten Largest Metropolitan Police Departments in the USA*, 9 Colum. J. of Race and L. 141, (2018), <<https://journals.library.columbia.edu/index.php/cjrl/article/view/2238>> [as of XX, 2026]; cf. Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 14-15 <<https://tinyurl.com/v33cu597>> [as of XX, 2026]; Camp et al., *Leveraging Body-Worn Camera Footage to Assess the Effects of Training on Officer Communication During Traffic Stops* (Sept. 2024) 3 Proceedings of the National Academy of Sciences Nexus 1, <<https://academic.oup.com/pnasnexus/article/3/9/pgae359/7756556>> [as of XX, 2026]. While the 2025 RIPA Board Report touched on this aspect of using BWC footage (2025 RIPA Board report, 130-131), the more specific focus of this Report is the use of technology-assisted BWC footage review.

¹⁶⁶ Cf. Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 6 & fn. 67 <<https://tinyurl.com/v33cu597>> [as of XX, 2026].

¹⁶⁷ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: A Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2255 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (noting that BWC data is a “public resource” related to public safety and policing because it can show challenges to law enforcement officers, provide information for community oversight and others, and can be used as a training resource and as a resource for academic study); *id.* at 2259 (“external actors could use the platform to evaluate the policing agencies’ practices and policies, including whether the agency is implementing new laws or trainings, the terms of a consent decree, departmental policies, and much more”); *id.* at 2285 (“The possibilities of what we might learn from the data are essentially limitless. . . . [¶] Academic researchers working with departments have unlocked a trove of insights from even relatively small sets of BWC footage”).

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show or use of force by the person stopped.¹⁶⁸ Technology-assisted footage review and analysis — including automated analysis of both audio and video — may make it possible to provide or estimate that measure and thereby to perform studies that can more accurately determine whether racial or other identity group disparities in use of force are attributable to racial or other identity group bias, whether intentional or implicit.

Similarly, technology-assisted review could be used to better identify the officer’s claimed legal justification for conducting a search, which would address another law enforcement suggestion for how to supplement the currently collected RIPA data elements to facilitate more reliable measures of patterns of racial or other identity group bias in police searches.¹⁶⁹ Also on the subject of searches, the New York City Police Department stop study discussed above shows that it is possible to layer on to RIPA data regarding searches reported as consensual a qualitative layer of analysis that looks at whether there are disparities in how different racial or other identity groups are asked for consent.¹⁷⁰

Below the level of aggregate analyses, there is also the potential for technology-assisted BWC footage review to provide police leadership with opportunities for coaching, commendation, problem-detection, and, where warranted, corrective action — and as discussed above, some law enforcement agencies, including California agencies, are already using technology for some of these purposes. It might be possible to use technology-assisted BWC footage review to audit RIPA stop entries for accuracy as to some of the data elements and to audit, or assist in auditing, for unreported stops.¹⁷¹ For example, technology-assisted BWC footage review could be used to determine the extent to which an agency’s officers are giving the person stopped a reason for why they were stopped.¹⁷²

To be clear, technology-assisted BWC footage analysis is no panacea. Standing alone, it will not reduce racial identity profiling or disparities (though there could be some positive effect simply from officers knowing that *all* their BWC footage is being reviewed and analyzed). But there appears to be significant potential for these tools to be a valuable part of a suite of efforts to reduce racially biased policing.

b. Access to BWC Footage and Police Review Platforms

Researchers into the use of BWC footage and police review platforms have noted that the practice of transcribing and annotating recorded police encounter “can help begin to unlock

¹⁶⁸ Police Officers Research Association of California, *Nation-Leading Racial Profiling Expert Finds Significant Flaws in Original Analysis of California Racial & Identity Profiling Board’s Stop Data* (Jan. 1, 2024), 1; Brian L. Withrow, *Efficacy of the California Department of Justice & Resident Contact Data Set for Evaluating Police Stops*, 5. To facilitate the envisioned analysis, it might be necessary for officers to state why they are conducting a search so the claimed legal basis for the search is recorded.

¹⁶⁹ Police Officers Research Association of California, *Nation-Leading Racial Profiling Expert Finds Significant Flaws in Original Analysis of California Racial & Identity Profiling Board’s Stop Data* (Jan. 1, 2024), 1; Brian L. Withrow, *Efficacy of the California Department of Justice & Resident Contact Data Set for Evaluating Police Stops*, 3.

¹⁷⁰ Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 4-5, 73 <<https://tinyurl.com/yv4yxb36>> [as of XX, 2026].

¹⁷¹ Cf. Voight et al., *What Can AI Tell Us About NYPD Street Stops? Using Natural Language Processing and Machine Learning to Analyze Investigative Encounters and Consent Searches from Police Body-Worn Camera Footage* (Apr. 2026), 2-3 <<https://tinyurl.com/yv4yxb36>> [as of XX, 2026].

¹⁷² See generally Gov. Code, § 12525.5, subd. (b)(3) (requiring peace officers to report the reason given to the person stopped at the time of the stop).

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perhaps the greatest untapped reservoir of data about policing,” as such review has the potential to provide insight that could benefit both the police agencies and the communities they serve.¹⁷³ However, they caution that when communities pay for BWCs, and agencies do not conduct such a review or “ignore the insights these data might offer,” that potential is wasted.¹⁷⁴ Instead, agencies “must rethink traditional notions of who owns BWC footage” and should treat the footage as “‘civic data,’ owned by the public, not by the police,” and “should be made far more widely available for research and training purposes.”¹⁷⁵

In fact, researchers have asserted that it is not enough to harness technology-assisted review’s potential to help reduce racially biased policing that law enforcement agencies have access to BWC footage and technological tools to review it.¹⁷⁶ Broader access to footage and review platforms is required. For example, policymakers could require, “at the time of purchase, that BWC analytics platforms adopted by police also be made available to prosecutors, public defense offices, and oversight entities in the jurisdiction.”¹⁷⁷ Access to footage might not be equal — the authors referenced above suggest that footage might be made available with court authorization or by legislation — but such entities would “not be at a technological disadvantage when it comes to review BWC footage.”¹⁷⁸ Further, the discussion above shows the value of making BWC footage available to researchers.¹⁷⁹

¹⁷³ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2284-2285 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; *id.* at 2286-2288.

¹⁷⁴ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2284-2285 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; *id.* at 2286-2288.

¹⁷⁵ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2284-2285 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; *id.* at 2286-2288 (discussing the status quo under which law enforcement agencies act as BWC footage owners and controllers) (authored by several leaders of the Policing Project at NYU School of Law, the Faculty Director for the Vanderbilt Project on Prosecution Policy at Vanderbilt Law School, and an additional law professor); *see* Southerland, *The Intersection of Race and Algorithmic Tools in the Criminal Justice System*, 80 Md. L. Rev. 487, 548 (2021) <<https://tinyurl.com/2p9udusz>> [as of XX, 2026] (“Yet for all of the accountability promised [by police body-worn cameras], the institutional actors holding the tools of accountability have not changed, which means the tools have not been able to meet their potential”).

¹⁷⁶ *See, e.g.,* Sisson, *AI Was Supposed to Make Bodycams Better. What Happened?*, MIT Technology review (Apr. 16, 2024) <<https://tinyurl.com/mpz8n6jv>> [as of XX, 2026] (noting that outsiders do not know what terms police are searching for, reporting one researcher’s comments that “[p]olice departments have little incentive to ask pointed questions about racial bias,” and stating that, “[t]he promise of these bodycam-to-text programs won’t be fully met if key terms, phrases, and interactions aren’t commonly tagged and analyzed”); *see also* Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2282 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; *id.* at 2270-2271 (discussing how one leading platform’s product and messaging has changed over time in response to pushback from line officers and law enforcement labor organizations).

¹⁷⁷ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2282 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; *id.* at 2286-2288 (discussing the status quo in which law enforcement agencies act as BWC footage owners and controllers).

¹⁷⁸ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2286-2288 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹⁷⁹ In most of the studies discussed above, the law enforcement agencies included in the study volunteered to make their footage available to researchers. In the New York City stop-and-frisk litigation, the footage was provided under the court’s remedial orders.

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The authors referenced above discuss what a regime of expanded access to BWC footage might look like, including a “data trust” model, under which controls are set on who has access to footage and the nature of different users’ access.¹⁸⁰ Any access regime must protect privacy rights and interests.¹⁸¹ Companies offering analytics platforms should be required to enter into agreements about permissible and impermissible data uses.¹⁸² Researcher access should be provided in ways to keep officer and civilian identities confidential.¹⁸³ Subsets of footage collections could be put in more controlled environments for individuals working to develop working on new review and analytics technologies.¹⁸⁴ Police background checks might be required for individuals accessing collections who might have access to personally identifiable information.¹⁸⁵ Given the high privacy interest stakes, the need for strong privacy protections to facilitate any type of BWC footage access regime is critical and legislation would be required to ensure the need is properly met.¹⁸⁶

The extent to which the public might currently be able to access California police BWC footage under the State’s public records law is beyond the scope of this Report. However, under current California law,¹⁸⁷ law enforcement agencies, departments, or entities establishing policies and procedures for the implementation and operation of a body-worn camera system are required to consider various “best practices regarding the downloading and storage of body-worn camera data,”¹⁸⁸ including that such data be considered the property of the law enforcement agency, and “shall not be accessed or released for any unauthorized purpose.”¹⁸⁹ This statute does not limit the public’s right to access recorded data under the California Public Records Act.¹⁹⁰ Generally, the California Public Records Act does not require the disclosure of law enforcement investigation records.¹⁹¹ That Act has a specific provision regulating when BWC footage related to a “critical incident,” as defined in the Act, may be withheld.¹⁹²

¹⁸⁰ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2288-2291 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹⁸¹ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2290-2291 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (emphasizing the importance of protecting officer and civilian privacy rights when making BWC footage available).

¹⁸² Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2291 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹⁸³ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2291 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹⁸⁴ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2291 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹⁸⁵ Voight et al., *Language from Police Body Camera Footage Shows Racial Disparities in Officer Respect*, 114 Proceedings of the National Academy of Sciences No. 25 (Jun. 5, 2017), 6525 <<https://tinyurl.com/7b3ujmcp>> [as of XX, 2026].

¹⁸⁶ Privacy protections are discussed further in section XX below in the context of how vendor analytics platforms and research applications can take measures to reduce privacy invasion risks.

¹⁸⁷ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2291 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

¹⁸⁸ Pen. Code, § 832.18, subd. (b).

¹⁸⁹ Pen. Code, § 832.18, subd. (b)(8).

¹⁹⁰ Pen. Code, § 832.18, subd. (d).

¹⁹¹ Gov. Code, § 7923.600, subd. (a).

¹⁹² Gov. Code, § 7923.625. Footage relates to a “critical incident” if it depicts an incident involving the discharge of a firearm at a person by a peace officer or custodial officer or an incident in which the use of force by a peace officer or custodial officer against a person resulted in death or in great bodily injury. Gov. Code, § 7923.625, subd. (e).

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In sum, to better utilize the potential for using technology-assisted BWC footage review to help study and ameliorate racial and identity profiling and disparities, BWC footage must be made more accessible beyond law enforcement agencies, and it would generally be beneficial to have access to collections of footage covering relatively large period. At the same time, the need to protect privacy is critical.

c. Retaining BWC Footage for Study

In general, having a large volume of police BWC footage to review — including a collection that covers enough time to encompass potentially relevant changes in law, policies, practices, and training — will increase the potential learning opportunities such footage may offer where technology is being leverage to perform the review and analysis.¹⁹³ At the same time, storage costs are obviously a consideration.

Under California law, agencies establishing policies and procedures for BWC systems must consider the following “best practices.”¹⁹⁴ First, the following footage should be retained for at least two years: (1) footage of incidents involving the use of force or an officer-involved shooting; (2) footage of an incident that leads to an individual’s detention or arrest; and, (3) footage relevant to a formal or informal complaint against a law enforcement officer or a law enforcement agency.¹⁹⁵ Second, footage that may be relevant to a criminal prosecution should be retained for the same time that other evidence that may be relevant to a criminal prosecution must be retained.¹⁹⁶ Third, in general, all other footage should be retained for at least 60 days.¹⁹⁷

d. Surveillance, Criminal Investigation, and Disparate Policing

The 2026 RIPA Report discussed the need to consider how technologies used by law enforcement may be concentrated on certain racial groups and the harm that can follow.¹⁹⁸ Technology-assisted BWC footage review warrants the same circumspection. In particular, the use of technology-assisted BWC footage review by police poses risks to civilian privacy — heightened by the potential integration of other surveillance technology tools — and raises the possibility that the technology will be used as a law enforcement surveillance and investigation tool, despite BWCs’ original purposes being to improve police training, accountability, and transparency.¹⁹⁹ This risk will be greater for communities that are already disproportionately

¹⁹³ See generally Mary D. Fan, *Body Camera, Big Data, and Police Accountability* (2018) 43 *Law & Social Inquiry* 1236 <<https://tinyurl.com/mucx4anv>> [as of XX, 2026].

¹⁹⁴ Pen. Code, § 832.18, subd. (b).

¹⁹⁵ Pen. Code, § 832.18, subd. (b)(5)(B).

¹⁹⁶ Pen. Code, § 832.18, subd. (b)(5)(C).

¹⁹⁷ Pen. Code, § 832.18, subd. (b)(5)(A).

¹⁹⁸ Racial and Identity Profiling Board, Annual Report (2026), p. 114-124 <<https://oag.ca.gov/ab953/board/reports>> [as of XX, 2026].

¹⁹⁹ “A paramount concern with platforms that transcribe and analyze BWC footage is that they will further the use of BWCs as a surveillance or criminal investigative tool. BWC footage contains a tremendous amount of data on members of the public—the technology captures their movements, statements made to police, and conversations with one another, among other things. As such, BWCs themselves present serious privacy risks.[] A platform that aggregates and analyzes all of an agency’s BWC footage, making it more widely accessible and easily searchable, could prove useful to investigators, but also would amplify these privacy risks.” Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 *Cardozo L. Rev.* 2247, 2267-2268 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (footnote omitted); *id.* at 2252-2253 (“because rules regarding BWCs have been largely left to police, law enforcement has transformed BWCs into a criminal investigative tool—one that raises serious potential privacy concerns.[] With recent technological advances,

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policed.²⁰⁰ And it is reasonable to expect that such communities will be disproportionately impacted by law enforcement actions and privacy incursions that follow from using technology-assisted BWC footage review as a surveillance and investigatory tool directed at civilians. Regulators may find the risks presented by some BWC analytics platforms are too great to permit their use by law enforcement agencies.²⁰¹ Vendor analytics platforms can be designed to limit the risk that they will be used by law enforcement for surveillance or investigative purposes — e.g., by focusing on audio rather than video, redacting personally identifiable information (PII) from transcripts, or controlling whether and how transcripts are searched.²⁰²

e. Privacy Issues

(1) Vendor analytics platforms

Because technology-assisted BWC footage review increases the amount of footage reviewed by humans, law enforcement officer privacy protections “are a relevant consideration.”²⁰³ It has been suggested that law enforcement agencies “should be transparent when using BWC analytics, making clear to officers the purpose of the tool, the information it will analyze, and the sorts of judgments it (with supervisor review) will make.”²⁰⁴ Vendor analytics products can be designed to protect the privacy of the officer and the individual stopped, such as by not

police now have the option, often unregulated by law, to add AI analytics capabilities, such as real-time search, facial recognition, and license-plate recognition”) (footnote omitted); Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024), 5 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026] [noting concerns centered on civilians’ privacy]; Sisson, *AI Was Supposed to Make Bodycams Better. What Happened?*, MIT Technology review (Apr. 16, 2024) <<https://tinyurl.com/mpz8n6jy>> [as of XX, 2026] (reporting concerns that potential to use AI technology for purposes other than accountability raises significant questions that must be addressed and that the technology “opens up law enforcement’s frame of surveillance” in a way that must be dealt with); see also Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2255 <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (commending the currently leading BWC footage review platform marketed to law enforcement for “design[ing] its platform to mitigate the chance it will drift toward investigative or surveillance uses”); Policing Project, New York University School of Law, Rethinking Response Part Two: AI to Analyze Body Worn-Camera Footage <<https://tinyurl.com/5n6ha2t5>> [as of XX, 2026] (“Jurisdictions should set clear rules governing how agencies can use BWC analytics and should make clear that these tools, which are adopted for accountability purposes, cannot be repurposed for surveillance”)

²⁰⁰ Cf. *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2283 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (considering the possibility of prohibiting police BWC analytics presenting an outsized risk to “equity”).

²⁰¹ See Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2283 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (noting the possibility of prohibiting BWC analytics that pose outsized risks to privacy, equity, and other values, “such as BWCs with real-time facial recognition capabilities”).

²⁰² Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2268-2269 (2025) <<https://tinyurl.com/y5ra98kw>> [as of May XX, 2026].

²⁰³ *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2284 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; see Watts et al., *Automating Body-Worn Camera Footage Review Through AI: Preliminary Findings From a Multi-Site Randomized Control Trial* (Aug. 14, 2024), 5 <<https://tinyurl.com/5ccffevj>> [as of XX, 2026] (noting that police have raised concerns about officer privacy).

²⁰⁴ *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2284 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]

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identifying or authenticating individuals based on their voice, storing officers' personally identifiable information separately from audio analysis, and not analyzing videos marked as confidential within the agency's evidence management system.²⁰⁵ In addition, vendor analytics products can and should provide officer and citizen privacy protections as appropriate to the context — e.g., not revealing personally identifiable information where it is not needed.²⁰⁶ Additional privacy protections for citizens are discussed in the section above relating to the interests in vendor BWC analytics products not being used for surveillance or investigation purposes.

(2) Researchers

Privacy interests are also implicated when researchers have access to BWC video collections to conduct studies using technological tools, which studies sometimes involve human reviewers as well. Researchers report they can use techniques to protect officer and community member privacy.²⁰⁷ In one study, researchers reported that, to protect privacy, they and their transcribers underwent police background checks, data was maintained on a central server, and speech unnecessary to the study was removed from the transcripts.²⁰⁸ Researchers can redact personally identifiable information in transcripts,²⁰⁹ remove identifying information from audio recordings,²¹⁰ and blur faces and remove private or sensitive information,²¹¹ in the same way that vendor analytics platforms can do so.

²⁰⁵ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 *Cardozo L. Rev.* 2247, 2284 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

²⁰⁶ See Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 *Cardozo L. Rev.* 2247, 2284 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Policing Project, New York University School of Law, *Rethinking Response Part Two: AI to Analyze Body Worn-Camera Footage* (2025) <<https://tinyurl.com/5n6ha2t5>> [as of XX, 2026] (“Data privacy is another critical concern. BWC footage often contains sensitive personal information—for example, an individual’s address or phone number. To protect individual privacy, and because such information is not needed for BWC footage to serve accountability or research ends, any system or program that analyzes BWC footage should ensure personally identifiable information is redacted before it reaches human reviewers”).

²⁰⁷ Voight et al., *Language from Police Body Camera Footage Shows Racial Disparities in Officer Respect*, 114 *Proceedings of the National Academy of Sciences* 6521, 6524, 6525 (Jun. 5, 2017) <<https://www.pnas.org/doi/abs/10.1073/pnas.1702413114>> [as of XX, 2026]; Camp et al., *The Thin Blue Waveform: Racial Disparities in Officer Prosody Undermine Institutional Trust in the Police*, 121 *Journal of Personality and Social Psychology: Attitudes and Social Cognition* 1157, 1159-1160 (2021); see also Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 *Cardozo L. Rev.* 2247, 2291 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026] (noting that in a “data trust” model for sharing BWC footage, “[r]esearchers might get access only to audio transcript, keeping officer and public identities confidential”).

²⁰⁸ Voight et al., *Language from Police Body Camera Footage Shows Racial Disparities in Officer Respect*, 114 *Proceedings of the National Academy of Sciences* No. 25 (Jun. 5, 2017), 6525 <<https://tinyurl.com/7b3ujmcp>> [as of XX, 2026] (transcribers and researchers underwent police background checks).

²⁰⁹ See, e.g., Prabhakaran et al., *Detecting Institutional Dialog Acts in Police Traffic Stops* (2018) 6 *Transactions of the Association for Computational Linguistics* 467, 469 <<https://tinyurl.com/3kp83pm8>> [as of XX, 2026].

²¹⁰ See, e.g., Rho et al., *Escalated Police Stops of Black Men are Linguistically and Psychologically Distinct in Their Earliest Moments* (May 30, 2023) 120 *Proceedings of the National Academy of Sciences*, 4 <<https://tinyurl.com/mpj6fje5>> [as of XX 2026].

²¹¹ See, e.g., Sribinowska et al., *Towards AI-Driven Policing: Interdisciplinary Knowledge Discovery from Police Body-Worn Camera Footage* (Jun. 19, 2025) <<https://tinyurl.com/3sv77ccr>> [as of XX, 2026].

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f. Democratic Authorization

Researchers have advocated for law enforcement agencies to employ the concept of “democratic authorization,” or an analysis of the impact to the rights and public safety of individuals, to determine whether to implement technologies, including products that permit LEAs to review and analyze BWC footage.²¹² The democratic authorization process, including providing an opportunity for public input and debate, ensures transparency and strengthens public trust in law enforcement’s use of these technologies; absent such a process, law enforcement agencies run the risk of undermining public trust and could face backlash.²¹³

As noted above, with regard to automated license plate reader systems, California law requires a public agency that operates or intends to operate an ALPR system to provide an opportunity for public comment at a regularly scheduled public meeting of the governing body of the public agency before implementing the program.²¹⁴ The California Legislature could enact similar legislation related to the purchase and use of technology-assisted BWC footage review tools. Regarding expanded access to BWC footage for study and analysis using technology-assisted BWF footage review, if this matter is to be left to local jurisdictions to decide, the Legislature could again impose a public notice and comment opportunity requirement.

g. Transparency

Transparency with communities and policymakers can be facilitated by vendors of technology-assisted BWC review disclosing products how their products work, including how the vendor developed its artificial intelligence models and how it validated its outputs.²¹⁵ Law enforcement agencies can “develop, implement, and make public a use policy that explains how officers and supervisors are to use the platform,” and “make public at least aggregate data gleaned from their use of the platform.”²¹⁶ Legislative bodies can require such disclosures and policies, which can also respond to privacy concerns and other civil liberties issues.²¹⁷

California law currently requires law enforcement agencies to consider some “best practices” in establishing policies and procedures for their BWC systems that may be relevant to transparency

²¹² Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2279 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]; Policing Project, New York University School of Law, *Rethinking Response Part Two: AI to Analyze Body Worn-Camera Footage* (2025) <<https://tinyurl.com/5n6ha2t5>> [as of XX, 2026]; *ibid.* (“when police obtain and use technology without permission or transparency, there can be backlash. This undermines public trust and sometimes ends up depriving police of a tool that might have furthered community safety.”); cf. Murphy, *Is it Recording?—Racial Bias, Police Accountability, and the Body-Worn Camera Activation Policies of the Ten Largest Metropolitan Police Departments in the USA*, 9 Colum. J. of Race and L. 141, 180 (2018) <<https://journals.library.columbia.edu/index.php/cjrl/article/view/2238>> [as of XX, 2026] (proposing model policy for police BWC activation and asserting that, “[a]ny efforts to adopt this model ought to be preceded by meaningful community consultation, especially with regard to the countervailing privacy interests”).

²¹³ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2279 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026]

²¹⁴ Civ. Code, § 1798.90.55, subd. (a).

²¹⁵ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2281 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

²¹⁶ Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo’s AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2281 (2025) <<https://tinyurl.com/y5ra98kw>> [as of XX, 2026].

²¹⁷ See, e.g., Civ. Code, §§ 1798.90.5-1798.90-55 (statutes regulating use of ALPR systems); Pen. Code, § 832.18, subd. (b) (statute requiring consideration of best practices for issues related to downloading and storage of police BWC footage).

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issues arising from using technology-assisted footage review (including third-party researchers), including, but not limited to: (1) that records or logs of footage access should be retained permanently,²¹⁸ (2) that where an agency uses a third-party vendor to manage storage, the agency should consider whether the vendor is using a system that has a built-in audit trail to prevent data tampering and unauthorized access,²¹⁹ and, (3) that footage “shall not be accessed or released for any unauthorized purpose.”²²⁰

C. Stop Data Analytics Tools for Law Enforcement Agencies

The RIPA Board seeks a future in which agencies are better able to make use of their RIPA stop data to improve outcomes, with the ultimate objective being to eliminate racial or identity profiling and disparities. Stop data analytics tools that are available to agencies — whether offered by third-party vendors, developed by agencies themselves, or provided by researchers or consultants — would likely be a part of this future.

Having RIPA data analytics tools puts agencies in a better position to identify racial disparities that may be indicative of racial profiling and to assess what might be causing observed disparities and how they might be addressed. Data analytics tools might also help to identify subsets of stops that warrant deeper study through the types of technology-assisted BWC footage review discussed above, either by focusing third-party vendor review tools on those stops, or by having interested researchers perform such work. Agencies equipped with analytics tools may similarly be in a better position to assess what they are doing that might be reducing racial and identity profiling or disparities. If nothing else, for any given agency, data analytics tools can be used to enhance public reporting of an agency’s RIPA stop data.

1. Stop Data Analytics Tools

Some California law enforcement agencies use products offered by third-party vendors for their officers to record their RIPA stop data. Such vendors may offer associated product features that enable agencies to gather (and report) analytics on their RIPA data on a continuous basis.²²¹ While the RIPA Board does not recommend any particular product or tool, one product offering publicly advertises that such tools may be used to show stop data by year, month, race, use of force, and other data elements, to provide detailed demographic breakdowns by race or other identity groups, and to show data regarding reasons for stops, stop results, and search data.²²² Marketing materials suggests the software can be configured to run customized RIPA data analytics for an agency based on its areas of interest.²²³ Agencies that find a need for third-party products should undertake research of available offerings to fit their RIPA reporting needs.

Some agencies use their own technology or forms for their officers to record their RIPA stop data. Depending on its resources, such an agency may be able to run its own RIPA stop data analytics. Indeed, in general, any agency, *provided it has the resources*, is capable of analyzing its own RIPA stop data, whether the agency uses its own tools to record stop data or a third-party vendor’s tool.

²¹⁸ Pen. Code, § 832.18, subd. (b)(5)(E).

²¹⁹ Pen. Code, § 832.18, subd. (b)(7)(C).

²²⁰ Pen. Code, § 832.18, subd. (b)(8).

²²¹ Veritone, Inc., *Veritone Introduces Contact Analytics for California Law Enforcement to Enhance Real-Time Data Insights and Strengthen Public Trust* (Jan. 9, 2025) <<https://www.veritone.com/newsroom/press-releases/contact-analytics/>> [as of XX, 2026].

²²² *Ibid.*

²²³ *Ibid.*

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In addition to what agencies may do on their own, each year's RIPA Report includes disaggregated statistical data for each reporting law enforcement agency reported by the California Department of Justice.²²⁴ This data is only reported on an annual basis, however, and does not include any time series data or longitudinal analyses. The types of RIPA stop data analytics tools under discussion here may be more robust in these regards.

2. Agency Disclosures Reflecting the Use of Stop Data Analytics Tools

Some California law enforcement agencies publish their reported RIPA stop statistics.²²⁵ For example, the Los Angeles County Sheriff's Department has an online RIPA data information data dashboard/interactive database that gives nearly up-to-date numbers and statistics and includes a filtering function to view data disaggregated by calls for service versus deputy-initiated calls, bicycle stops, vehicle stops, pedestrian stops, station name, and city/area.²²⁶ The data can also be viewed for viewer-selected date ranges.²²⁷ This dashboard/interactive database is reflective of the types of data (and filtered data) that can be generated with the types of stop data analytics tools under discussion here.

One private website reflects the use of data analytics tools to show agency-level RIPA stop data for a large collection of California agencies, including some statistical disparities measures, including data filtered by year, which facilitates year-over-year comparisons.²²⁸

3. Using Analytics Tools to Improve Outcomes

Provided they have the resources, agencies can acquire or develop stop data analytics tools to apply to the raw RIPA stop data they are collecting for RIPA reporting requirements to go beyond merely generating numbers and statistics that are not contextualized.²²⁹ Tools that enable agencies to generate and publish statistics related to particular areas, organizational units, officers, types of stops, time periods, or other stop data elements, alone or in combination, can be used to provide agencies, policymakers, civilian oversight entities, community members, and

²²⁴ Pen. Code, § 13519.4, subd. (j)(3)(E).

²²⁵ Los Angeles County Sheriff's Department, AB 953 - R.I.P.A Stop Data Information Dashboard <<https://lasd.org/transparency/ripa-dashboard/>> [as of XX, 2026]; San Francisco Police Department, Police Department Stop Data <https://data.sfgov.org/Public-Safety/Police-Department-Stop-Data/ubqf-aqzw/about_data> [as of XX, 2026] (data reportedly updated quarterly); see also Los Angeles Police Department, LAPD Community RIPA Dashboard <<https://www.lapdonline.org/ripa-dashboard/>> [as of XX, 2026] (online "RIPA dashboard" but reporting pages blocked without a valid account sign-in as of XX, 2026). The City of Oakland Police Department publishes annual stop data statistics reports on its website. City of Oakland, Data from Police Officer Visits and Stops <<https://www.oaklandca.gov/Public-Safety-Streets/Police/OPD-Data/Data-from-Police-Officer-Visits-and-Stops>> [as of XX, 2026]. The Board has not verified the accuracy of the data in these sources.

²²⁶ Los Angeles County Sheriff's Department, AB 953 - R.I.P.A Stop Data Information Dashboard <<https://lasd.org/transparency/ripa-dashboard/>> [as of XX, 2026].

²²⁷ Los Angeles County Sheriff's Department, AB 953 - R.I.P.A Stop Data Information Dashboard <<https://lasd.org/transparency/ripa-dashboard/>> [as of XX, 2026].

²²⁸ RIPA Explorer, Agency Explorer <<https://ripastops.org/agency/CA0431400>> [as of XX, 2026]. The Board has not determined whether all RIPA-reporting agencies are included in this interactive database tool. The Board has not verified the data on this site.

²²⁹ Veritone, Inc., *Veritone Introduces Contact Analytics for California Law Enforcement to Enhance Real-Time Data Insights and Strengthen Public Trust* (Jan. 9, 2025) <<https://www.veritone.com/newsroom/press-releases/contact-analytics/>> [as of XX, 2026] (vendor product marketing this functionality); Los Angeles County Sheriff's Department, AB 953 - R.I.P.A Stop Data Information Dashboard <<https://lasd.org/transparency/ripa-dashboard/>> [as of XX, 2026] (data dashboard indicating the department has acquired or developed such analytics).

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researchers with potentially valuable insights.²³⁰ Analytics tools that facilitate analyses by time periods in particular are useful insofar as they make it possible to compare data (e.g., racial and identity group statistical disparities) from before the date that a relevant reform or other event was implemented or occurred with data from after that date.²³¹ Trends may be more readily identified when agencies have the ability to see their stop data in real time or to run comparisons across time periods. It is not possible to design and implement interventions in response to trends if the trends are not observed.

4. Other Considerations

Similar to the case of technologies for reviewing police BWC footage, discussed above, a process of democratic authorization, including community review and input, may be appropriate before a law enforcement agency makes any significant expenditure to acquire (or develop) stop data analytics tools.²³² Decisionmakers can also consider hearing from various stakeholders about the types of stop data analyses the agency should be running and the format and functionalities desired of data dashboards or other reporting systems to be provided by the agency.

There are also transparency considerations.²³³ The values of trust and accountability can be served when agencies (and third-party vendors, as applicable) are transparent about the data they are using, how any non-obvious aspects of their analytics tools operate, how they are resolving any significant data issues, how various terms used in their reporting are defined, and what the various data fields they show are capturing. Agencies using stop data analytics tools can also be transparent about how they are using the tools and the data they generate to try to reduce racial and identify profiling and disparities. Agencies can also help justify their investments in stop data analytics tools by disclosing the analyses they are generating and by making the tools available to non-agency actors, as through interactive online dashboards and databases.

VI. POLICY RECOMMENDATIONS

[Area for Board discussion. Below are potential policy recommendations based on the research and data discussed above, for the Board's consideration and input.]

Potential recommendations related to Kavanaugh stops

1. *All law enforcement agencies covered by AB 953 shall adopt policies prohibiting racial or identity profiling that include the RIPA definition of "racial or identity profiling" and all officers should be trained on that definition.*

²³⁰ See generally Pryor, et al., *Collecting, Analyzing, and Responding to Stop Data: A Guidebook for Law Enforcement Agencies, Government, and Communities* (2020) <<https://www.policingproject.org/stopdata>> [as of XX, 2026].

²³¹ See 2026 Annual RIPA Report, 125-151 (comparing stop data and statistics before and after policy reforms).

²³² Cf. Civ. Code, § 1798.90.55, subd. (a) (requiring an opportunity for public comment at a regularly scheduled public meeting before implementing an automated license plate reader program; Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2279-2280 (2025) <<https://scholarship.law.vanderbilt.edu/faculty-publications/1703/>> [as of XX, 2026]; see generally Barry Friedman, *Democratic Policing* (2015) 90 N.Y.U. L. Rev. 1827, 1832-1835.

²³³ Cf. Heydari et al., *Putting Police Body-Worn Camera Footage to Work: a Civil Liberties Evaluation of Truleo's AI Analytics Platform*, 46 Cardozo L. Rev. 2247, 2281-2282 (2025), <https://scholarship.law.vanderbilt.edu/faculty-publications/1703/> [as of xx, 2026] (discussing transparency issues related to use of technology-assisted police body-worn camera review).

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Potential recommendations related to perceived English fluency

2. *Law enforcement agencies should consider creating standardized language-need protocols for officers to use as a structured tool to identify language needs rather than making on-the-spot judgments. This could reduce the risk that race shapes assumptions about who need language support.*
3. *Law enforcement agencies should acquire and use real-time translation technology, if non-English fluency is having a disproportionate impact on a particular racial or ethnic group.*

Potential recommendations related to ALPR systems

4. *The Legislature should amend Civil Code section 1798.90.55, subdivision (a), to provide: (1) that a public agency that operates an automated license plate reader system and that intends to expand the functionalities or uses of the system or the information it collects beyond what was disclosed in a prior noticed meeting of the agency's governing body shall provide an opportunity for public comment at a regularly scheduled meeting of the governing body of the public agency before implementing the expansion; and, (2) a public agency that operates an automated license plate reader system and did not provide an opportunity for public comment at a regularly scheduled meeting of the governing body of the public agency before implementing the system (or before expanding the functionalities or uses of the system or the information it collects) shall, within 90 days, provide an opportunity for public comment regarding the agency's use of the system at a regularly scheduled meeting of the governing body of the public agency.*

Potential recommendations related to BWC footage review

5. *Law enforcement agencies should audit BWC footage specifically for language-related interactions to detect patterns and identify potential areas for improvement.*
6. *The Legislature and local legislative bodies should enact legislation requiring police body-worn camera footage to be retained for at least [x years] and requiring public and researcher access to body-worn camera footage collections for review and study, subject to provisions designed to protect active, ongoing investigations, protect individually identifiable personal information, protect privacy rights and interests (including legitimate privacy rights and interests of peace officers), protect data security, and prevent misuse.*
7. *The Legislature should enact legislation similar to Civil Code section 1798.90.55, subdivision (a), requiring a public agency that operates or intends to operate a technology-assisted body-worn camera footage review platform to provide an opportunity for public comment at a regularly scheduled meeting of the governing body of the public agency before implementing the program.*
8. *The Legislature should enact legislation requiring that agencies operating a technology-assisted body-worn camera footage review platform shall not use the platform as a tool for surveilling or investigating civilians.*

Potential recommendations related to stop data analytics tools

9. *The Legislature or local legislative bodies should enact legislation allocating funds to State and local law enforcement agencies to procure data analytics tools that generate statistical analyses of the agency's RIPA stop data—including racial and identity group disparities—as the data is collected electronically, on a real-time,*

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continuous basis, and require agencies receiving such funds to provide such the agencies' RIPA stop, and the statistical analyses run on the data using the procured analytics tools, on their websites, and to provide the data in a manner that allows for interactive use, such as filtering by time periods, locations, other variables, and combinations of variables, to the greatest extent reasonably possible.

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