

MILWAUKEE POLICE DEPARTMENT

Automated License Plate Readers
Fire and Police Commission- Regular Session
May 7, 2026

What specific training is provided before anyone is granted access to the department's ALPR and similar technology?

- Fusion Division Training Video
 - Captain of Police is the trainer
 - Emphasis on associating each query with a valid and accurate CAD or Case Number
- ALPR User Agreement
 - Prerequisite to gaining access
 - Requires reading and acknowledging SOP 735

Milwaukee Police Department

Automated License Plate Readers (ALPR) User Agreement

Purpose: This User Agreement must be signed by each user of the MPD ALPR System to ensure users are aware of MPD's policy and the user's obligations for appropriate use of the ALPR System under SOP 735.

By signing this User Agreement, I agree to the following:

1. Each ALPR query I make will be for a legitimate law enforcement purpose. _____ (Initial)
2. Each ALPR query I make will have a complete and accurate Case Number or CAD number associated with the Investigation. _____ (Initial)
3. My access to the MPD ALPR system may be revoked at any time by MPD. _____ (Initial)
4. I have read and understand the procedure and expectations of SOP 735 and I understand that my use of the ALPR System must comply with Department policy. _____ (Initial)
5. If I make a ALPR query on behalf of another Department Member, I am responsible for the accuracy of the information submitted for that query. _____ (Initial)
6. Violations of this agreement, or SOP 735, will be subject to discipline.

MPD Member:

Captain/Commander:

Name Printed _____

Name Printed _____

PeopleSoft # _____

Signature

Signature

How is ongoing use supervised in real time, and who is responsible for reviewing searches and access logs?

- Work location supervision is primarily responsible for review of queries
- Access to the ALPR system is controlled by the Intelligence Fusion Division
- Compliance Management Section provides supervisors a list of queries that are subject to audit.

How frequently are audits conducted, and are they proactive or only triggered after a complaint?

- A regular monthly cadence has been set for the Data Directed Audit
- For Complaints received by MPD, an immediate review would be triggered by IAD and complimented by Compliance Management Section.

What disciplinary policies exist for violations, and are they consistently enforced?

- ALPR User Agreement explicitly acknowledges that misuse/violative use are subject to discipline
- Discipline Matrix ensures consistency in enforcement
- *Wis. Stat.* § 62.50 (17)(b)- seven standards of Just Cause
- Core Value 1.00, 1.04- Competence
 - Police Investigations shall be based, at a minimum, on reasonable suspicion or the occurrence of an actual or possible criminal offense. All investigations shall be conducted- and reports prepared- in a prompt, thorough, impartial, and careful manner to ensure accountability and compliance with the law.
- Core Value 1.00, 1.05-Competence
 - All Department Members shall be familiar with Departmental policies, procedures, and training and expected to conduct themselves in full accordance with them.

What safeguards are in place to ensure these systems are not used for immigration enforcement without a judicial warrant?

- SOP 130.30 (B)- Enforcement of the nation's immigration laws is the responsibility of the federal government, particularly the United States Bureau of Immigrations and Customs Enforcement (ICE). Accordingly, the Milwaukee Police Department does not unilaterally undertake immigration - related investigations and does not routinely inquire into the immigration status of persons encountered during police operations.
 - Note: Most immigration violations are civil and fall under the jurisdiction of the federal government. As such, local law enforcement officers have no right of arrest in these matters.
- SOP 130.30 (E)- Police members shall not detain or arrest an individual solely for a suspected violation of immigration law.... An administrative warrant is not a criminal warrant signed by a judge, and it shall not be used by any department members as the basis to detain or arrest a person.

How is the City ensuring compliance with local policies, state law, and constitutional protections regarding data access and surveillance?

- CJIS Compliance and Audit- State and Federal
- Wisconsin Law Enforcement Accreditation Group
- License Investigation Unit- Compliance with Licensed Premise Ordinances (e.g., 105-91, 84-20-4.5, 68-33)
- “[N]early uniform consensus of courts that have evaluated the constitutionality of ALPRs and held that their uses were not Fourth Amendment searches requiring warrant or probable cause.” *Scholl v. Illinois State Police*, 776 F.Supp.3d 701, 719-20 (N.D. Ill, 2025).

MPD Audit and Review

- Monthly audit of ALPR use by MPD has increased in robustness
- Prior audit process did not leverage data
- MPD now uses a data directed audit that drives the audit process by identifying outliers, volume trends, Z-scores, and basic alpha-numeric use to advance specific queries to a deep dive audit.

Outlier Data Types

- Case Number Outliers
 - Z score of 3 or greater
 - One officer per case number
 - 10 or more queries by Officer
 - 25 or more days
- Officer Assessment Outliers
 - Specific plate assessment for total number of queries
 - Specific case number assessment for total number of queries
- License Plate Outliers
 - One Officer Per Plate
 - Z score of 3 or greater
 - 5 or more queries by Officer
 - 25 or more days

Purpose Limitation Tied to Documented Casework

- Tying each query to a CAD or Case Number ensures that supervision has a documented purpose to audit.
- User agreement explicitly states the required purpose in associating the query to an active law enforcement investigation.

Flagging and Supervisory Escalation

- Recommendation for Removal
 - When member's use falls below expectations of policy, they may be removed from the system
- Discipline
 - Addressed in an earlier slide
 - Criminal Complaint for misconduct in public office
 - Career ending decisions for misuse

Clear Firewall for Immigration Enforcement

- Members are prohibited by SOP 130 from using immigration status as the basis for a criminal investigation and explicitly prohibit civil enforcement of administrative immigration policies.
- Members are required by Core Value 1.04 to base their investigations on reasonable suspicion of a crime.

Questions and Discussion

