VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

HARRISON NEAL, **Plaintiff,**	:	
v.	:	
	:	**Case No. CL-2015-5902**
FAIRFAX COUNTY POLICE DEPARTMENT, et al., **Defendants.**	:	

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF SUMMARY JUDGMENT

Defendants, Fairfax County Police Department (FCPD) and Colonel Edwin C. Roessler Jr. (Colonel Roessler), collectively referred to herein as "the Defendants," file this Memorandum in Support of their Motion for Summary Judgment filed herein.

BACKGROUND

On May 5, 2015, the Plaintiff, Harrison Neal (Neal), filed a Complaint against the FCPD and Colonel Roessler, Chief of the FCPD. The Complaint alleges that the FCPD and Colonel Roessler violated the Data Collections and Dissemination Practices Act (the Act), Va. Code Ann. § 2.2-3800 *et seq.*, by retaining photographic images of Neal's vehicle's license plate in a database. (Compl. ¶ 33.) Neal's assertions are largely premised on a 2013 Attorney General opinion addressing a similar Virginia State Police (State Police) database. (Compl. ¶¶ 26-31.) Neal requests that the Court issue an injunction and/or a writ of mandamus pursuant to Va. Code Ann. § 2.2-3809, prohibiting future violations of the Act. The parties have filed cross-motions

for Summary Judgment pursuant to Rule 3:20, and have stipulated to the authenticity of any documents produced in discovery for purposes of their summary judgment motions.[1]

FACTS NOT GENUINELY IN DISPUTE

1. The FCPD is the primary law enforcement agency in the County of Fairfax, and its officers responded to 447,818 calls for service in 2014. (SJ Ex. 1, Response 1.)[2]

2. Within Fairfax County, on an average day in 2014, 21 citizens were the victim of crimes against persons, and 71 citizens were the victim of crimes against property. (SJ Ex. 1, Response 1.)

3. In 2014, the average number of calls for service per day addressed by FCPD officers was 1,227. (SJ Ex. 1, Response 1.)

4. The FCPD utilizes Automatic License Plate Reader (ALPR) equipment and technology as part of its effort to detect criminal activity and promote the health, safety and welfare of Fairfax County residents and visitors. (SJ Ex. 2.)[3]

5. The FCPD ALPR program is a tool for law enforcement to identify vehicles that are of specific interest in law enforcement investigations. (SJ Ex. 2.)

6. The FCPD receives funding and equipment for its ALPR program through a federal Department of Homeland Security Urban Areas Security Initiative (UASI) monetary grant, and

[1] The Defendants' exhibits in support of Summary Judgment establish that they were produced in discovery through the inclusion of Bates numbering in the lower right hand corner of each page.
[2] Exhibit 1 is a copy of the Defendants' responses to Neal's First Request for Admissions. References to particular responses are cited as "Ex. 1, Response" followed by the applicable request number. Also included within Exhibit 1 is the Defendants' sworn response to Neal's Second Set of Interrogatories, which addresses the Admissions denials.
[3] Exhibit 2 is the FCPD's current Standard Operating Procedure (SOP) 11-039, signed by Colonel Roessler on January 1, 2011, which governs the FCPD ALPR program.

utilizes equipment provided by ELSAG North America, with the MPH-900 computer application. (SJ Ex. 1, Response 6; SJ Ex. 3.)[4]

7. Along with other local jurisdictions in the D.C. Metro area, the FCPD is a member of the National Capital Region (NCR), and participates in the Homeland Security Strategic Plan with all other NCR jurisdictions. The stated purpose of the Strategic Plan is to ensure that NCR jurisdictions are prepared to respond to regional events, including events that require collection, analysis, and dissemination of intelligence and investigative information. (SJ Ex. 4.)[5]

8. The FCPD ALPR program utilizes cameras, which can be stationary or mounted on a police cruiser, and which capture images of passing vehicles' license plates. (SJ Ex. 5; SJ Ex. 6.)[6]

9. The MPH-900 application converts license plate photos taken by ALPR cameras into a digital number/letter combination that is not state specific, and compares that number/letter combination in real time against a list of stolen or wanted license plate numbers, commonly known as a "hot list," which is published twice daily by the State Police. (SJ Ex. 5.)

10. Captured license plate images, the letter/number combination, and the GPS coordinates of the location where the image was captured, are stored in an electronic FCPD ALPR database

[4] Exhibit 3 is the MPH-900 Application Overview.
[5] Exhibit 4 is the National Capital Region Homeland Security Strategic Plan.
[6] Exhibit 5 is a copy of the training materials for certificed FCPD ALPR users. Exhibit 6 is a copy of a draft press release published by the FCPD related to its ALPR program.

for 364 days, after which time they are purged from the database pursuant to FCPD policy. (SJ Ex. 2.)[7]

11. Information stored in the FCPD ALPR database provides an additional investigative tool for FCPD officers in the detection or investigation of criminal activity, or in responding to other calls for service, including AMBER alerts and missing or endangered persons. (SJ Ex. 2, SJ Ex. 3.)

12. FCPD employees who have been certified and trained as ALPR system users may query the database to gather information and intelligence in FCPD criminal investigations, or at the request of other NCR member agencies for assistance in their own criminal investigations. (SJ Ex. 7.)[8]

13. The ALPR database is searchable only by license plate number. The database does not maintain the make, model, year, or registration information associated with a vehicle, nor does it photograph or identify the owner or driver of the vehicle, or capture the owner's or driver's identifying information. (SJ Ex. 6.)

14. On May 7, 2014, Neal submitted a request to FCPD pursuant to the Act and the Freedom of Information Act (FOIA), Va. Code Ann. §§ 2.2-3700, *et seq.*, for all documents in the custody of the FCPD pertaining to the license plate number "ADDCAR." (SJ Ex. 8.)[9]

15. On May 15, 2014, the FCPD provided a timely response to Neal's request, producing

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[7] Neal has no objection to the FCPD's capture of license plate images, or its electronic comparison of the resulting number/letter combinations against the State Police hot list. *See* Plaintiff's Complaint, at paragraph 7. At issue in this matter is the FCPD's practice of maintaining a database of the letter/number combinations in a database for 364 days, which Neal alleges is a violation of the Act.

[8] Exhibit 7 contains examples of instances wherein FCPD employees have queried the ALPR database in an effort to further these criminal investigations.

[9] Exhibit 8 is a copy of Neal's May 7, 2014, request for information pertaining to the plate number ADDCAR.

documentation from two instances wherein a FCPD ALPR camera captured the image of the ADDCAR license plate, which were both maintained in the ALPR database. (SJ Ex. 9.)[10]

16. A photo of the ADDCAR license plate was captured by a FCPD LPR camera on April 26, 2014. (SJ Ex. 9.)

17. A photo of the ADDCAR license plate was captured by a FCPD LPR camera on May 11, 2014. (SJ Ex. 9.)

18. The FCPD ALPR database did not contain Neal's name, address, date of birth, or any information related to the individual to whom the ADDCAR license plate number was registered. The only information maintained as to the ADDCAR license plate in the FCPD ALPR database was a photograph of the license plate and the GPS coordinates for the location wherein the photo was captured. (SJ Ex. 2; SJ Ex. 6; SJ Ex. 9.)

19. During the time period that a photo of the ADDCAR license plate was maintained in the FCPD ALPR database, among other criminal investigations, the FCPD was participating in at least two regional task forces. Both task forces involved criminal investigations into a series of burglaries in the region, and both included crimes committed within Fairfax County. (SJ Ex. 1, Response 1; SJ Ex. 10.)[11]

20. During the time period that the ADDCAR license plate photo was maintained in the FCPD ALPR database, certified FCPD users utilized the database to support their investigative efforts into crimes that were committed and investigated during that time. (SJ Ex. 1, Response 2; SJ Ex. 7.)

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[10] Exhibit 9 is the FCPD's response to Neal's May 7, 2014, request.

[11] Exhibit 10 contains documentation related to both task force investigations.

21. On January 8, 2016, Neal submitted a second request pursuant to the Act and FOIA for copies of all documents in the custody of the FCPD pertaining to the license plate number ADDCAR. (SJ Ex. 11.)[12]

22. On January 13, 2016, the FCPD provided a timely response to Neal's request, notifying him that the FCPD did not have any documents responsive to his request. (SJ Ex. 12.)[13]

23. On February 13, 2013, the Attorney General of Virginia published an advisory opinion in response to a request made by the Superintendent of the State Police for an opinion as to whether the Act permits law enforcement agencies to collect, maintain and disseminate ALPR data. (SJ Ex. 13)[14]

ARGUMENT

I. LEGAL STANDARD

Under Rule 3:20 of the Rules of the Virginia Supreme Court, either party may make a motion for summary judgment and the trial court may grant such motion if it appears that the moving party is entitled to judgment as a matter of law.

II. NEAL'S COMPLAINT MUST BE DISMISSED FOR HIS FAILURE TO ESTABLISH THE EXISTENCE OF FACTS THAT WOULD ENTITLE HIM TO RELIEF PURSUANT TO VA CODE ANN. § 2.2-3800 *et seq.*

The Act provides that government agencies that maintain an information system that contains the personal information of data subjects must maintain that system within particular standards set out by statute. Va. Code Ann. §§ 2.2-3800, *et seq.* Before Neal may avail himself to the remedies provided in the Act, he must establish that the FCPD's ALPR program is

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[12] Exhibit 11 is a copy of Neal's January 8, 2016, request for information pertaining to the plate number ADDCAR.
[13] Exhibit 12 is the FCPD's response to Neal's January 8, 2016, request.
[14] Exhibit 13 is the Attorney General Opinion, which was attached as an exhibit to Neal's Complaint as Exhibit C.

governed by the Act, and that he qualifies as an individual entitled to an injunction or writ of mandamus pursuant to Va. Code Ann. § 2.2-3809.

a. The Act does not apply to the FCPD's ALPR program because Neal is not a data subject as defined in Va. Code Ann. § 2.2-3801.

To qualify as an aggrieved person who is entitled to an injunction or writ of mandamus pursuant to Va. Code Ann. § 2.2-3809, Neal must first prove that he is a data subject whose personal information has been retained by the FCPD in an agency information system without authorization by law. *See* Va. Code Ann. § 2.2-3800. These terms as defined in the Act impose upon Neal the obligation to prove that images of the license plate ADDCAR and the corresponding date, time and location of the camera that captured the images, constitute his personal information as defined by the Act. As such, the meaning of the terms "personal information," "data subject," and "information system" within Va. Code Ann. § 2.2-3801 are paramount to this Court's consideration.

It is well settled that "[t]he plain, obvious, and rational meaning of a statute is always preferred to any curious, narrow or strained construction." *Rasmussen v. Commonwealth*, 522 S.E. 2d 401, 403 (1999) (quoting *Gilliam v. Commonwealth*, 465 S.E. 2d 592, 594 (1996)). "Where a statute is unambiguous, the plain meaning is to be accepted without resort to the rules of statutory interpretation." *Rasmussen*, 465 S.E. 2d at 403. Furthermore,

> "[u]nder the rule of *ejusdem generis*, when a particular class of persons or things is enumerated in a statute and general words follow, the general words are to be restricted in their meaning to a sense analogous to the less general, particular words. Likewise, according to the maxim *noscitur a sociis* . . . when general and specific words are grouped, the general words are limited by the specific and will be construed to embrace only objects similar in nature to those things identified by the specific words."

Surles v. Mayer, 628 S.E. 2d 563, 572 (2006). *See also Wood by and Through Wood v. Henry Cnty. Public Schs.*, 495 S.E. 2d 255 (1998); *Kappa Sigma Fraternity, Inc. v. Kappa Sigma Fraternity*, 587 S.E. 2d 701, 710 (2003).

The General Assembly has unambiguously defined the term "personal information" in the Act to include information that describes, locates or indexes anything *about an individual*, such as an individual's "social security number, driver's license number, agency-issued identification number, student identification number, real or personal property holdings derived from tax returns, and his education, financial transactions, medical history, ancestry, religion, political ideology, criminal or employment record," or the personal characteristics *of an individual*, such as "finger and voice prints, photographs, or things done by or to *such individual*; and the record of his presence, registration, or membership in an organization or activity, or admission to an institution." Va. Code Ann. § 2.2-3801 (Emphasis added.)

As a license plate number is not specifically identified within the definition of "personal information," this Court must determine whether the legislature, by use of the phrase "including, but not limited to," intended to include a vehicle's license plate number as a term similar in nature to the specific examples of an individual's personal information included in the statute. *Surles*, 628 S.E. 2d at 571-72. Unlike all of the specific terms contained in the definition of "personal information," the license plate number of a vehicle, particularly one that is not connected to a particular issuing state, says absolutely nothing about an individual, his personal characteristics such as his fingerprints, or his membership in an organization. Indeed, the only reason that the Defendants received any of Neal's personal information was because Neal himself furnished his name, address, and a photocopy of his Virginia operator's license to the FCPD in his FOIA requests. (SJ Ex. 8; SJ Ex. 11.) The only information that the FCPD

maintained in its information system relevant to Neal's claims were two photographs of a license plate bearing the characters ADDCAR, and the date, time, and location that each photo was taken. (SJ Ex. 9.) The FCPD's ALPR database contained no additional information associated with the license plate number, nor did it contain any information specific to Neal. (SJ Ex. 9.) As such, the license plate photos that are the subject of the Complaint filed herein cannot constitute personal information as defined by the Act.

Neal has also failed to establish that the information regarding the ADDCAR license plate was maintained in an "information system" as defined by the Act. According to Va. Code Ann. § 2.2-3801, an information system consists of "the total components and operations of a record-keeping process, including information collected or managed by means of computer networks and the Internet, whether automated or manual, containing personal information *and the name, personal number, or other identifying particulars of a data subject.*" (Emphasis added.) The record-keeping process at issue here is the FCPD ALPR database. Therefore, even if it is assumed that Neal's license plate number constitutes personal information as defined by the Act, Neal is still required to establish that the FCPD database qualifies as an information system before he will be entitled to relief.

To qualify as an information system that is governed by the Act, the FCPD's ALPR database must house both personal information, and a second piece of information that constitutes "the name, personal number, or other identifying particulars of a data subject." Va. Code Ann. § 2.2-3801. Assuming for the sake of argument that the ADDCAR license plate number constitutes Neal's personal information, Neal must therefore establish that the FCPD's database contains at least one other piece of information that would identify him, such as his name, or a number associated with his name. It is uncontroverted that the FCPD's ALPR

database maintains only the license plate number for a vehicle. No other information about the vehicle, or about the individual who is the owner or driver of the vehicle, is maintained in the database. Therefore, even if it is assumed that a license plate number is personal information, the fact that the database contains no additional information required by Va. Code Ann. § 2.2-3801 is fatal to Neal's claim because the FCPD database cannot, by definition, be an information system.

Therefore, because a license plate number is not personal information as defined by the Act, and because the FCPD's ALPR database does not constitute an information system as defined by the Act, Neal is not a data subject, i.e., "an individual about whom personal information is indexed . . . in an information system." Va. Code Ann. § 2.2-3801. As such, Neal is not entitled to relief pursuant to the Act, and his Complaint must be dismissed.

b. The FCPD's Database is Specifically Excluded from the Provisions of the Act Pursuant to Va. Code Ann. § 2.2-3802(7).

Even if Neal was a data subject and the FCPD ALPR database is an information system as defined by the Act, the Complaint must still be dismissed because a database "that deal[s] with investigations and intelligence gathering related to criminal activity" is specifically excluded from the Act. Va. Code Ann. § 2.2-3802(7). The uncontroverted evidence produced in discovery establishes that the FCPD maintains its database of ALPR information for 364 days in conjunction with the Homeland Security Strategic Plan, and in an effort to provide investigative assistance to its own officers, and officers in the NCR who investigate criminal activity. (SJ Ex. 2; SJ Ex. 4.) This is also demonstrated by instances wherein FCPD employees have conducted queries of the database in criminal cases, including murder, robbery, sexual assault, and burglary investigations. (SJ Ex. 7.)

Specifically, during the time period wherein the ADDCAR license plate number was maintained in the FCPD ALPR database, the FCPD, in conjunction with the its NCR partner jurisdictions, investigated two serial burglary cases, one involving burglaries of local business establishments, and the other involving residential burglaries of Fairfax County homes. (SJ Ex. 10.) Also during this time period, NCR jurisdictions worked together to locate and capture Wossen Assaye (Assaye), a federal prisoner who escaped from Fairfax hospital and carjacked two victims in the process of his escape. (SJ Ex. 7.) Witness descriptions of the second carjacking victim's vehicle contained conflicting information as to the color of the vehicle. *Id.* ALPR information from a partner NCR jurisdiction provided this crucial information, as the color of the vehicle was visible in the photograph of the license plate, and this information was relayed to FCPD officers, who utilized it to narrow the scope of suspect vehicles during their perimeter search.[15] *Id.*

In addition to these specific examples from the time period wherein the ADDCAR license plate photograph was retained by the FCPD, evidence produced in discovery conclusively establishes that the ALPR database has been an invaluable source of intelligence that has enabled FCPD officers to solve crime and apprehend criminals. (SJ Ex. 7.) This evidence further establishes the need to maintain this data for passive use even if the target vehicle's license plate number is not on the State Police hot list. For example, in 2012, a FCPD officer used the ALPR database to locate a victim's stolen vehicle after he reported that the vehicle was stolen while he was asleep. (SJ Ex. 7.) The database contained an image of the stolen vehicle's license plate number, along with the location where the photograph was

[15] Obviously, the color of a vehicle does not constitute personal information, and the fact that some ALPR license plate images include portions of the exterior of a vehicle does not change the analysis herein.

captured. *Id.* The officer proceeded to that location and found the victim's vehicle. *Id.* The license plate number was not on the State Police hot list when the photograph was taken, because the victim had not yet discovered the crime.

As is demonstrated repeatedly and conclusively by the evidence in this case, information maintained within the FCPD ALPR database constitutes intelligence that the FCPD utilizes routinely in its efforts to investigate crimes and make arrests of individuals who violate the law. As such, the database falls squarely within the exception provided by Va. Code Ann. § 2.2-3802(7), and the ALPR database is not regulated by the Act.

c. The Attorney General's Opinion Supports the Legality of the FCPD Database When Considered in Light of the Evidence Produced in Discovery.

No binding authority exists in Virginia that addresses the issue of whether license plate numbers in a database violate the Act. Neal's Complaint is therefore largely premised on his reliance on the related 2013 Attorney General opinion. (Compl. ¶¶ 26-31.) However, the evidence produced in discovery clearly establishes that the Attorney General opinion upon which Neal relies is inapplicable to the FCPD's database. While an opinion of the Attorney General is not binding authority in the Court's consideration of this matter, it is entitled to "due consideration." *See Twietmeyer v. City of Hampton*, 497 S.E. 2d 858, 861 (1998).

On February 13, 2013, the Attorney General issued an opinion in response to a request by Colonel W.S. Flaherty of the State Police, regarding the State Police ALPR system. Op. Va. Att'y Gen. 12-073 (February 13, 2013). The opinion related to whether law enforcement agencies, including the State Police, could maintain data such as license plate numbers in an ALPR database. As outlined below, the opinion is readily distinguishable when viewed in light of the evidence produced in this case, and therefore does not support Neal's position that the

FCPD violated the Act when it maintained the ADDCAR license plate photos in its ALPR database.

The Attorney General opinion addressed two provisions of the Act that impacted the conclusion that the State Police ALPR program violated the Act. First, the Attorney General assumed that the State Police program maintained personal information of data subjects. Op. Va. Att'y Gen. 12-073 (February 13, 2013). Second, the Attorney General concluded that the State Police program was not exempted from the Act. *Id.* While the opinion ultimately concluded that the State Police failed to demonstrate that their ALPR database met the parameters of the Act, the opinion clearly left open the possibility that other ALPR programs could either satisfy the Act, or be excluded entirely from the Act pursuant to Va. Code Ann. § 2.2-3802(7), based upon the particulars of the database related to that program. *Id.* at 5 (concluding that the Act "does not preclude law enforcement agencies from maintaining, using and disseminating personal information collected by an LPR, provided such data specifically pertains to investigations and intelligence gathering related to criminal activity"). Applying the reasoning of the Attorney General opinion to the evidence produced in this case, Neal can no longer rely on the opinion to support his claims, because the FCPD ALPR program does not contain personal information, and because the program clearly falls within the exemption provided in Va. Code Ann. § 2.2-3802(7), as recognized by the Attorney General.

First, as to the issue of whether an ALPR program maintains personal information, the Attorney General opined that a database that "may assist in locating an individual data subject, documenting his movements, or determining his personal property holdings," would fall within the parameters of the Act. *Id.* at 3. In further explanation, the Attorney General stated that "[r]eadily attainable information" in such a database "may include the vehicle registrant's name,

address, vehicle information, and potential lien status." *Id.* at n. 7. The FCPD ALPR database clearly falls outside of the Attorney General's definition of a database that would violate the Act because it does not house any of the types of information listed within the Attorney General's examples of personal information of an individual. Quite to the contrary, the information contained in the FCPD ALPR database contains none of the information outlined above, nor does the database index the license plate number of a vehicle with any of the types of personal information listed in the opinion. (SJ Ex. 9.) As such, the opinion's analysis of whether the State Police database contains personal information is inapplicable to an analysis of the FCPD database.

Second, as to the issue of whether the State Police ALPR database was exempt from the Act, the opinion's analysis is also inapplicable to this case. According to the Attorney General, an ALPR database could be excluded from the Act pursuant to two separate statutes: Va. Code Ann. § 52-48, which establishes the Virginia Fusion Intelligence Center (Fusion Center), which is to be maintained by the State Police, and Va. Code Ann. § 2.2-3802(7), which is the exemption contained within the Act for "investigations and intelligence gathering relating to criminal activity" and which is the exemption relied upon by the FCPD in this case should the Court conclude that the FCPD ALPR database is subject to the Act.

The Fusion Center database is exempted from the Act because the information contained therein constitutes "criminal intelligence information," a term that by definition is more restrictive than the exemption provided in the Act. Va. Code Ann. § 52-48. According to the Attorney General, because State Police are required to maintain intelligence information in accordance with the parameters of the Fusion Center statutes, they may not maintain a database outside of those parameters. Op. Va. Att'y Gen. 12-073, at 4 (February 13, 2013). Therefore,

because the State Police database must comply with the Fusion Center statutes, which provide a more restrictive exemption for criminal intelligence information, and because the Attorney General found that the State Police database did not conform to the requirements for the Fusion Center, the Attorney General opined that the State Police ALPR database was not exempted from the Act.

This leaves, however, the exemption provided within the Act for information related to "investigations and intelligence gathering respecting criminal activity." *Id.* at 5. In analyzing this exemption as it would relate to other ALPR databases, the Attorney General recognized that, although the State Police could not justify their ALPR database by labelling the data contained within "criminal intelligence information," an ALPR database could still be exempted from the Act if it satisfied Va. Code Ann. § 2.2-3082(7). The FCPD ALPR database does just that. The evidence produced in this case conclusively establishes, as outlined *supra*, that the FCPD database is clearly properly classified as "deal[ing] with investigations and intelligence gathering relating to criminal activity." *See* Va. Code Ann. § 2.2-3802(7). As such, according to the Attorney General's analysis, the FCPD database is not governed by the Act. Therefore, Neal has wholly failed to establish that the FCPD ALPR database exists in violation of the Act, and his Complaint must be dismissed.

CONCLUSION

The Defendants are entitled to summary judgment in this matter because the FCPD ALPR database is not governed by the Act, and therefore, Neal is not entitled to the relief that he seeks from this Court.

Respectfully submitted,

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By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of August, 2016, a true copy of the foregoing document was sent via electronic mail and mailed, first-class mail, postage prepaid, to:

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