FREEDOM OF INFORMATION COMMISSION STATEMENT ON HOUSE BILL 5449, AN ACT CONCERNING AUTOMATED LICENSE PLATE READER SYSTEMS.

March 9, 2026

The Freedom of Information Commission offers the following statement on House Bill 5449, which seeks to make confidential "automated license plate reader data," while allowing for disclosure of information regarding locations of still or video image recording devices used as a part of an automated license plate reader system and data derived from audits, usage logs and logs detailing access to such systems.

Specifically, Section 1(d) provides that "[a]utomated license plate reader data shall not be disclosable under the Freedom of Information Act…." Such data is defined (in lines 7-11) as "any data captured, recorded, stored, processed or derived from an automated license plate reader system, including, but not limited to, license plate characters, vehicle still or video images, vehicle attributes, location data, time stamps and metadata."

The FOI Commission would like to make the committee aware that in a November 2025 Final Decision[1], the Commission concluded that the Manchester Police Department violated the disclosure provisions of the Freedom of Information Act by failing to provide the requester with public records; specifically, "license plate data generated by automated license plate readers." In its final decision, the FOI Commission noted that, because the police department had not extracted and preserved the requested records,[2] they could not meet their burden of establishing the applicability of the claimed exemption from disclosure, based upon generalized testimony regarding records they did not review and do not exist.[3] As there were no records to review, the determination regarding the applicability of any particular exemption was not fully adjudicated at that time. A subsequent complaint[4] involving the same parties and a new request for data is pending before the Commission.

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[1] *See* Docket #FIC 2024-0808; Katherine Revello and Connecticut Inside Investigator v. Chief, Police Department, Town of Manchester; Police Department, Town of Manchester; and Town of Manchester (November 19, 2025), available at https://portal.ct.gov/-/media/foi/finaldecisions/2025/nov19/20240808.pdf

[2] In Docket #FIC 2024-0808, the Commission found that since the police department had not extracted the requested records, they were automatically deleted following the receipt of the records request at issue. The data was stored on a cloud-based system for a period of thirty days.

[3] *See* Town of Greenwich v. FOI Commission, 226 Conn. App. 40, 59, *cert. denied,* 349 Conn. 924 (2024) ("without first conducting a search to determine whether the records…exist and, to the extent they exist, reviewing such records, the plaintiffs cannot satisfy their burden of establishing that those records are exempt from disclosure….").

[4] *See* Docket #FIC 2026-0058; Katherine Revello v. William Darby, Chief, Police Department, Town of Manchester; Police Department, Town of Manchester; and Town of Manchester (Filed January 22, 2026).

The Commission believes that there is a strong public interest in law enforcement agency use of automated license plate reader information technology. As the committee may be aware, discussion in the legislature about automated license plate readers has accelerated due in part to reporting[5] by journalists who discovered out-of-state authorities have searched data collected by Connecticut police departments thousands of times in an effort to enforce federal immigration laws. That story came to light due in part to public records requests filed with local police departments.

In light of the case pending before the Commission, we take no further position on the proposal at this time.

For further information contact: Paula S. Pearlman, Managing Director and Associate General Counsel or Russell Blair, Director of Education and Communications, at (860) 566-5682.

[5] Out-of-state police are using Connecticut license plate camera data for immigration enforcement (CTinsider.com, February 3, 2026) https://www.ctinsider.com/connecticut/article/ct-license-plate-camerareader-flock-immigration-21252287.php