

In the Matter of a Complaint by

REPLY BRIEF

Kathrine Revello et. al.

Docket #FIC 2024-0808

Complainant

against

Chief of Police Department,
Town of Manchester, et al.

Respondents

RESPONDENT'S REPLY BRIEF

Per order of hearing officer Danielle McGee in the above matter, the respondents hereby submit the following reply to the Claimant's brief dated June 16, 2025.

Argument:

Contrary to the initial statement in the Complainant's post – hearing brief, the Manchester Police Department is not watching. The evidence in this case indicates, that during the course of an average thirty (30) day period, approximately 5 to 6 million images are captured by the ALPRs, yet only an extremely small percentage of those images are ever viewed by police personnel. After thirty (30) days all the images are purged by an outside vendor (i.e. Flock). The only individuals who have access to those images are Manchester police personnel and they only do so while conducting an investigation of a crime. The only purpose in compiling these images is to assist police personnel with their investigatory techniques and falls within the context of the exemption claimed.

The claimant argues in support of their FOI complaint that other departments (i.e. Hartford and University of Connecticut police departments) have previously produced ALPR spreadsheets containing tens to hundreds of thousands of entries/results. That is a mere fraction compared to the 5 to 6 million scans that are captured by ALPR's in the Town of Manchester. Testimony from Jim White confirmed that number of monthly scans as well as the number of man hours involved in downloading scans to produce spreadsheets summarizing scan data. That testimony is undisputed by a qualified witness. The examples cited by the complainant are not comparable to the quantum of data involved in this case.

Conclusion:

The complaint in this matter should be dismissed.

Dated June 30, 2025