
	<b>GAITHERSBURG POLICE DEPARTMENT</b>		
	<b>License Plate Recognition System</b>		
	<b>GENERAL ORDER</b>	<b>616.5</b>	
<b>Effective Date</b>	<b>1/15/2026</b>	<b>1.2.9, 42.1.6, 43.1.1, 43.1.2, 46.3.1, 46.3.2, 61.1.7</b>	
<b>Authorized by:</b>		<b>Mark P. Sroka</b> CHIEF OF POLICE	SIGNATURE
			DATE <b>1/15/2026</b>

**1. PURPOSE**

1.1. The purpose of this directive is to establish guidelines for the use of License Plate Recognition (LPR) systems designated for parking enforcement and criminal investigative purposes. LPR technology enhances operational efficiency by enhancing the speed, accuracy, and efficiency of the parking enforcement program and providing a valuable resource for law enforcement investigations, including identifying vehicles associated with criminal activity, missing persons, stolen property, and other legitimate law enforcement objectives. This approach supports the Department’s commitment to public safety while respecting privacy and adhering to all applicable legal standards.

**2. POLICY**

2.1. LPR technology will be used for parking enforcement purposes, including the identification of parking violators and monitoring of parking occupancy patterns, as well as for criminal investigative purposes, including locating vehicles linked to criminal activity, missing persons, or for other similar law enforcement objectives. This directive establishes guidelines for the deployment and use of LPR technology in a manner that is consistent with legal mandates, and which safeguard privacy expectations.

2.2. The operation of all LPR systems must follow the manufacturer’s specifications and Department-approved procedures and best practices. The use of any LPR data shall be for legitimate law enforcement purposes in accordance with the provisions outlined in [Maryland Public Safety Code § 3-509](#).

**3. DEFINITIONS**

3.1. **Alarm** - Within the context of this directive, the terms “alarm” and “hit” are used interchangeably and refer to a positive indication, by visual or audible signal, of a potential match between data on the current parking hot list and data associated with a registration plate scanned by the LPR system. A hit indication is not conclusive, and additional verification is required to confirm the accuracy of any suspected match.

3.2. **Download** - Within the context of this directive, the term “download” refers to a transfer of registration plate listings and associated data from

the T2 Safety System files to the LPR system.

- 3.3. **Hot List** - Within the context of this directive, the term “hot list” refers to a parking enforcement database list where each vehicle is identified by a license plate number, the issuing state, and the reason why the vehicle is of interest to parking enforcement (e.g., permit holder, digital chalking, unpaid parking citations, etc.)
- 3.4. **LPR Generated Data**- Within the context of this directive, the term “LPR generated data” refers to all information, including location, date and time of a registration plate encounter, the optical character recognition (OCR) interpolated data and any LPR generated digital images of a registration plate or vehicle that are generated entirely by and through the use of LPR systems equipment.
- 3.5. **License Plate Recognition (LPR) System**- Within the context of this directive, the terms “License Plate Recognition System” or “LPR System” refer to systems consisting of cameras, computers, and computer software used to capture registration plate images, interpret the characters depicted and compare the data against a regularly updated listing of registration plates and associated information of interest to parking enforcement.

#### 4. **PROCEDURE**

##### 4.1. **General Provisions**

- 4.1.1. The Department’s use of LPR technology is intended to enhance operational effectiveness by supporting parking enforcement and criminal investigations through improved ability to identify and locate vehicles associated with parking violations, multiple unpaid citations, and criminal activity.
- 4.1.2. LPR technology shall be utilized for detection purposes rather than for the collection and retention of information not related to legitimate law enforcement purposes.
- 4.1.3. LPR systems shall only be operated by personnel who have successfully completed Department approved training on use of the equipment.

##### 4.2. **Deployment**

- 4.2.1. LPR systems may be deployed as:
  - 4.2.1.1. Vehicle-mounted units on any Department-owned or leased vehicles approved for parking enforcement.
  - 4.2.1.2. Fixed-mounted units, including fixed-mounted cameras in City facilities such as parking garages, for legitimate law enforcement objectives.

- 4.2.2. Operation of LPR-equipped vehicles and fixed-mounted systems shall be in accordance with all Department directives governing equipment use and associated procedure.
- 4.2.3. All LPR systems shall be installed and maintained in accordance with manufacturer specifications and vendor instructions.
- 4.2.4. Prior to use, authorized personnel shall ensure that vehicle mounted LPR devices are properly configured and loaded with the most current hot list or investigative data, following Department-approved training and protocols.
- 4.2.5. LPR systems and related resources may be utilized in support of:
  - 4.2.5.1. Area-wide parking enforcement activities and objectives, in alignment with the City's Parking Permit Program and established enforcement protocols.
  - 4.2.5.2. Authorized criminal investigations, consistent with Department policies and applicable legal standards.

**4.3. Response to LPR System Alerts**

- 4.3.1. When a registration plate from the hot list is detected on a parking enforcement vehicle mounted LPR system, an audible and visual alert is given by the system. The LPR operator should:
  - 4.3.1.1. Take reasonable measures to verify that the alert corresponds to a valid parking violation or permit infraction, ensuring the registration plate captured matches the alert details;
  - 4.3.1.2. As soon as practicable, confirm the violation status using authorized parking enforcement systems or databases via the mobile data computer; and
  - 4.3.1.3. Initiate appropriate enforcement action, such as issuing a citation or coordinating with towing services, in accordance with City Code and established parking enforcement procedures.
  - 4.3.1.4. Fixed-mounted LPR's do not generate alerts.
- 4.3.2. Any response to LPR system alerts for parking enforcement shall comply with applicable laws, City Code provisions, and Department directives, including policies governing vehicle operations, use of mobile data systems, and data handling protocols.

- 4.3.3. When LPR-generated data directly results in a parking enforcement action (e.g., citation issuance or a vehicle being towed), the associated use of the LPR system shall be documented in the narrative section of the corresponding parking enforcement report or citation.
- 4.3.4. Parking-related vehicle information (e.g., permit violations, time-restricted parking data) shall not be manually entered into LPR systems.

#### **4.4. Data Storage, Retention, and Access**

- 4.4.1. All LPR data shall be retained and stored as described below and thereafter shall be purged unless it has become or it is reasonable to believe it will become evidence in a criminal or civil action or is subject to a lawful action to produce records. In those circumstances the applicable data shall be downloaded from the T2 server and logged into evidence. The records will then be subject to standard evidence retention policies in accordance with the procedures outlined in the Department's Records and Retention Manual.
- 4.4.2. Data that may become, or is reasonably believed to become, evidence in a criminal or civil proceeding, or that is subject to a lawful request or order to produce records, the data shall be downloaded from the T2 Server, submitted and logged into evidence. Parking enforcement LPR data is stored based on the following schedule:
  - 4.4.2.1. Read Metadata- 30 days
  - 4.4.2.2. Read Images- 30 days
  - 4.4.2.3. Hit Metadata- 365 days
  - 4.4.2.4. Hit Images- 365 days
  - 4.4.2.5. Patroller Tracking (LPR vehicle)- 90 days
- 4.4.3. The Gaithersburg Police Traffic Section Supervisor, City of Gaithersburg Administrative Staff, and any contractors involved in issuing citations and collecting parking citation fines are authorized to access the LPR data needed to process citations. No LPR operator (Parking Enforcement Officials) may access the T2 Systems Telecommunications data unless otherwise authorized by the Commander, Special Operations Bureau.
- 4.4.4. City personnel shall not use, or allow others to use, the LPR equipment or database records for any unauthorized purpose. Staff shall ensure that the LPR system is operated in conformity with this Policy and other Departmental policies, procedures, rules and

regulations.

- 4.4.5. Access to LPR systems and related data is restricted to LPR-trained Parking Enforcement Officials, authorized Gaithersburg Police personnel for investigative purposes, and authorized City of Gaithersburg IT administrators.

#### **4.5. Care and Maintenance**

- 4.5.1. Members shall not attempt any modification of, or repair to, LPR systems or operating software. The LPR has no user serviceable components. All maintenance and repair will be coordinated with the appropriate vendor.
- 4.5.2. The Traffic Section Supervisor shall be notified of any LPR system component requiring maintenance or repair, or in the event of damage or malfunction.
  - 4.5.2.1. Any Parking Enforcement Official or authorized Gaithersburg Police personnel who causes or discovers damage to an LPR unit or related equipment shall immediately notify the Traffic Section Supervisor via email, providing detailed information about the circumstances of the equipment.
  - 4.5.2.2. The Traffic Section Supervisor shall in turn notify the Special Operations Bureau Commander and initiate any necessary review or follow-up in accordance with Department protocols without delay.
- 4.5.3. LPR camera lenses may be cleaned with glass cleaner or mild soap and water and a soft, non-abrasive cloth.
- 4.5.4. Personnel will exercise all reasonable means to safeguard the integrity and serviceability of LPR equipment, in a manner consistent with vendor and manufacturer recommendations.

#### **4.6. Information Sharing**

- 4.6.1. Any LPR data collected is for the official use of the City of Gaithersburg. This data may contain confidential information and is not open to public review.
  - 4.6.1.1. LPR information gathered and retained by this Department may be used and shared with the State's Attorney's Office or others as permitted by law.
- 4.6.2. Non-law enforcement requests for information regarding a specific vehicle's license plate may be honored when the requester is the registered owner of the vehicle, and when providing such

information will not infringe upon the privacy interests of a third party or the information will not interfere with an active criminal investigation. The requester in such cases must provide acceptable proof of his or her identity and of ownership of the vehicle in question.

- 4.6.3 Reports provided by the LPR vendor may periodically be aggregated so that data can be analyzed. LPR data contains no Personally Identifiable Information (PII) that may be used to connect license plate detection to an individual. Rather, the reports will consist of anonymized information using identification numbers that are not associated with a particular license plate or registered owner.

#### **4.7. Information Security**

- 4.7.1. The LPR system database and software resides in a Cloud Server, featuring full redundancy and access controls. The data remains the property of the City of Gaithersburg.
- 4.7.2. All queries into LPR data are logged by user and available for auditing and review by the Department. To ensure proper operation and facilitate oversight of the LPR system, all users will be required to have individual credentials for access and use of the systems and/or data.
- 4.7.3. Retention is automated, so that all data from the vehicle-mounted and fixed-mounted LPR-equipped is retained in accordance with Section 4.4.2. of this General Order.
- 4.7.4. All data collected from the LPR-equipped Parking Enforcement vehicles on-board system must be exported to the T2 server when the Parking Enforcement Officer logs off at the end of the shift. No data from those vehicles is retained by the Gaithersburg Police Department except for records identified as being related to a parking violation or investigation and exported during the shift it was captured.
- 4.7.5. All data collected for Parking Enforcement purposes (Handheld Mobile Units and Genetec LPR Systems) are hosted on City of Gaithersburg servers and are not accessible by vendors without knowledge and/or permission of City of Gaithersburg IT personnel.

#### **4.8. Auditing and Oversight**

- 4.8.1 To ensure proper oversight into the use of the LPR systems, both

vehicle-mounted and fixed-mounted, and adherence to this policy, all activities (e.g., plate detections, queries, reports) are automatically recorded by the system for auditing purposes. The audit report shall include an explanation regarding any data retained longer than one year (e.g., data retained as evidence as a result of parking violations/investigations).

4.8.1.1. An annual audit report will be prepared by the Special Operations Bureau Commander. This audit report shall include, but is not limited to, the total number of LPR units in operation, number of readings submitted to the Maryland Coordination Analysis Center (MCAC), number of readings being retained, number of in-state and out of state requests, and number of release of information requests.

4.8.2 [Maryland Public Safety Article § 3-509](#) requires Maryland Law Enforcement Agencies who capture and store Historical Automated LPR data to report by March 1 of each year to the Senate Judicial Proceedings Committee, the House Judiciary Committee, and the Legislative Policy Committee, in accordance with [§ 2-1257 of the State Government Article](#), on data collected via LPR systems from the previous calendar year.

4.8.2.1. The Special Operations Bureau Commander shall be responsible for ensuring this report is conducted.