



# Surveillance Impact Report

## TLOxp

### San Diego Police Department

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## DESCRIPTION

TLOxp is an internet-based online service provided by TransUnion. As defined on TLO.com, “TLOxp® is the latest generation of the technology that originated the science of data fusion. Built on an architecture of supercomputers running proprietary linking and assessment algorithms, TLOxp filters through a massive repository of public and proprietary data almost instantly.” It offers real-time resources to locate information about individuals, utilities, and assets. It is used to support San Diego Police Department criminal investigations. It is not a means to run credit reports.

## PURPOSE

TLOxp is utilized by Investigative units (Homicide, Sex Crimes, Missing Persons, Narcotics, Child Abuse, etc.) as well as the Crime Analysts that support these units for investigative purposes. Access is on a “need to know, right to know” basis, meaning there is an active crime case or law enforcement event that initiates the data inquiry. Utilizing this database enhances and advances the investigative process.

## LOCATION

TLOxp is a secure intranet available via web browser at SDPD substations, SDPD Headquarters and via Department-approved cellphones. Computer access requires user login multi-factor authentication and are situated in secure SDPD law enforcement facilities. Cellphone access requires multifactor authentication on Department-approved phones.

City of San Diego crime statistics can be viewed at [Crime Statistics & Crime Mapping | Police | City of San Diego Official Website](#).

## IMPACT

Only authorized law enforcement or criminal justice personnel with investigative casework responsibilities may be given access to TLOxp. They must articulate a “need to know, right to know” requirement. All transactions are for the furtherance of a law enforcement activity.

When accessing TLOxp, the user identifies their “need to know and right to know” by selecting the following purpose levels:

1. GLBA (Gramm-Leach-Bliley Act)  
Our purpose is “to comply with Federal, State, or local laws, rules, and other applicable legal requirements.”
2. DPPA (Driver's Privacy Protection Act)  
Our purpose is “Use by any government agency, including any court or law enforcement agency, in carrying out its functions, or any private person or entity acting on behalf of a Federal, State, or local agency in carrying out that agency’s functions.”

In addition, the user enters a case number or other unique identifier associated with the related law enforcement event in the “Reference ID” field.



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TLOxp enhances investigations by providing access to a vast amount of data from various sources, enabling investigators to gather comprehensive information about individuals, businesses, and other entities. This enhances the efficiency and effectiveness of investigations, allowing investigators to uncover connections, identify potential leads, and build a complete picture of a subject under investigation.

TLOxp improves risk assessment capabilities by analyzing multiple data points and providing insights into potential risks associated with individuals. The system consolidates various data sources into a single platform, which saves investigators time and effort in gathering information and research.

The San Diego Police Department's TLOxp Surveillance Use Policy safeguards civil liberties and civil rights. The uses and deployments of surveillance technology are not based upon discriminatory or viewpoint-based factors. The Department's use of surveillance technology is intended to support and benefit the communities of San Diego while minimizing and mitigating potential impacts on the civil rights and civil liberties of community members.

## MITIGATIONS

The following procedures are used to ensure compliance with the City of San Diego's Surveillance Ordinance:

1. Notification that the user is accessing a restricted information system.
2. Notification that system usage may be monitored, recorded and subject to audit.
3. Unauthorized use of the system is prohibited and may be subject to criminal and/or civil penalties.
4. Use of the system indicates consent to monitoring and recording.

SDPD personnel's use of TLOxp is regulated by Department Procedure 1.45 Use of City/Department Computer Systems.

The collection, use, retention, or dissemination of data shall not be used to violate the Constitutional rights of any person or in any manner that would discriminate against any person based upon their ethnicity, race, gender, natural origin, religion, sexual orientation or gender identity.

## DATA TYPES AND SOURCES

Users can make inquiries on a variety of identifiers that include name, date of birth, social security number, address, business, phone, land ownership, email addresses and social media usernames. A comprehensive report can be requested that puts this information in a report format, in logical groupings that make it easier to understand. The information is only a possible match and must be confirmed, that is, vetted for accuracy with the source agency/custodian of records before a law enforcement response can be initiated.



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## DATA SECURITY

Computers require user login multi-factor authentication and are situated in secure law enforcement facilities. Cellphone access at crime scenes and in the pursuit of a fugitive, child abduction or kidnapping for ransom require multifactor authentication. Both levels of access capture the inquiry transactions. An audit can be performed by site administrators on an as-needed basis.

## FISCAL COST

In the fiscal year 2022, TLOxp cost SDPD \$12,790. In the fiscal year 2023, TLOxp cost SDPD \$13,000. It is estimated that TLOxp will cost SDPD \$14,000 in fiscal year 2024.

## THIRD PARTY DEPENDENCE

There is no third-party data sharing.

## ALTERNATIVES

TLOxp offers real-time resources to locate information about individuals, utilities, and assets. It is a valuable tool that aids the accuracy and efficacy of the investigative process by identifying individuals, associated assets, utilities, businesses and social media identifiers. An alternative to TLOxp is CPClear, which SDPD investigative units and crime analysts utilize. Both platforms offer a wide range of data sources. However, the specific databases, interfaces, and user experience vary between systems.

## TRACK RECORD

There are no known adverse actions related to using this system, only benefits. TransUnion is responsible for uploading the information into TLOxp. Information gathered is only a pointer system. The user validates the authenticity of the information through the appropriate custodian of records, typically a law enforcement agency, or if necessary, through another non-law enforcement service provider by means of a search warrant.

## PUBLIC ENGAGEMENT AND COMMENTS

On January 11, 2024, at 1800 hours, there was a publicly held meeting in all nine council districts in the City of San Diego. The following surveillance technologies were presented by the San Diego Police Department:

1. ARJISNET
2. Cal-Photo
3. Code5Group GPS Bike
4. Covert Cloud-Based Mobile Application
5. NICE Logging Recorder
6. Object Tracker
7. Parole LEADS
8. SDLaw
9. TLOxp



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## 10. Vehicle Tracker

There were no attendees in District 1. There were no attendees in District 2. There were no attendees in District 3. There were four attendees in District 4. There were no attendees in District 5. There was one attendees in District 6. There were no attendees in District 7. There were no attendees in District 8. There were two attendees in District 9. There was a total of one comment and no questions out of the seven attendees. There were no comments submitted to the online public comment form.

Question:

Question regarding the lack of notification of the meetings and a comment regarding the fiscal impact and waste of City employee time and wasted city funds for the presentations, in compliance with the ordinance.

Answer:

Advance notification was given because we want to hear everyone's voice.

To maximize the reach of the materials presented at the community meetings, the Police Department created a link to the City of San Diego's technology website which provides all materials for presented technologies as well as upcoming technologies and additional materials. The materials and questions/comments section could be accessed by visiting the below web address: [www.sandiego.gov/police/technology](http://www.sandiego.gov/police/technology). The web address was posted in conjunction with the QR code at the community meeting.

The Department also video recorded a meeting so that it could be presented to a larger group. The benefit of the video was the capability of translating the presentation into over 100 languages such as Spanish, and other languages frequently used by the communities within San Diego, to maximize penetration of the materials to affected groups. The link to the video is at the San Diego Police Department's YouTube channel under: [Surveillance Technology Community Meeting 01/11/2024 \(youtube.com\)](https://www.youtube.com/watch?v=Surveillance Technology Community Meeting 01/11/2024)