



June 2, 2021

VIA EMAIL

Office of the Attorney General
1300 "I" Street
Sacramento, CA 95814-2919

Attn: Public Integrity Unit

RE: Request for Investigation of LAPD's Relationship With Ring LLC

Dear Attorney General Bonta:

The Electronic Frontier Foundation (EFF) respectfully requests that the California Department of Justice initiate a public integrity investigation into the relationship between Ring LLC and the Los Angeles Police Department (LAPD) and other local law enforcement agencies in California.

Ring, a subsidiary of Amazon based in Santa Monica, CA, sells home surveillance cameras and operates a social media service, Neighbors, for members of the public to post videos and other, often unsubstantiated, claims of suspicious activity. As part of its business model, Ring has formed partnerships with more than 2,000 local law enforcement agencies nationwide, including more than 145 in California. These partnerships purport to allow law enforcement to more easily seek video evidence of crime from residents. In reality, these partnerships serve as the means for Ring to use gifts and favors to enlist law enforcement officers to market and promote their products to community members in violation of prohibitions on both accepting gifts and endorsing products.

As has been previously reported by publications such as *Vice* and *CNET*, Ring has for many years engaged in questionable practices to cultivate law enforcement partnerships, such as hosting parties at police conferences where officers received free food, free drinks, and free Ring video doorbells. Ring representatives also provided free cameras and discount codes to police departments directly.

In response to a California Public Records Act (CPRA) request from NBC, LAPD has released more than 3,000 pages of emails between Ring representatives and LAPD personnel that reveal a widespread practice of improper influence.

Over the course of just a few years, a small team of Ring representatives systematically courted individual police officers, offering free equipment and discounts in exchange for LAPD officers using their position to promote Ring's products to other police officers and the larger community. The emails involved dozens of officers across multiple LAPD

divisions, reaching all the way to the office of the Chief of Police. In general, these emails followed a similar strategy, often including boilerplate language: they often started with Ring soliciting a preliminary phone call with an LAPD officer, followed by a free gift or substantial discount, then a request for the officer to arrange community meetings or promote the Ring product over social media. In the aggregate, the communications implicate a broad scheme to improperly influence government officials.

Examples of these improper relationships include:

- In May 2016, an LAPD Senior Lead Officer (SLO) in the West Hollywood Division provided Ring with a list of people who attended an LAPD Religious Forum, who would each be receiving free devices. In the same email, the SLO noted that a patrol captain's supervisor wanted Ring cameras for his new house. The SLO asked for a quote; however, no quote was provided. Instead, the supervisor contacted Ring directly with a request for three cameras, which Ring then sent free of charge via FedEx. (Binder B, pp. [1821](#), [1226](#))
- In June 2016, an LAPD West Los Angeles Division officer thanked Ring for his free camera: "Thank you very much for the stick up camera[.] I really appreciate your generosity. I love the ring doorbell, I recommend it to everyone that I meet." The officer then expressed interest in acquiring three more products. Six minutes later, the Ring representative responded: "I'll get your order started right away. It's our pleasure, your service is truly appreciated." (Binder B, p. [1097](#))
- In April 2016, an LAPD officer connected a Ring representative with the South Brentwood Residents Association via email. The officer openly endorsed the product, telling the association that "[o]ur detectives use and support this product" and that "I completely believe in and support this product!" The officer added, "I'd be more than welcome to attend and help facilitate any meetings." (Binder B, p. [61](#))
- Between June and August 2016, Ring recruited an LAPD officer in the Emergency Services Division to circulate a coupon code to neighborhood watch groups and military personnel in exchange for free equipment depending on how many times the code was used. Over the course of many weeks, the Ring representative regularly updated the officer on how close he was to receiving various perks. "Mike, I just wanted to check in and see if your solar panel and stick up were delivered. You are killing it by the way. Your code has 14 uses, eleven more and I will be sending you every device that we sell," the Ring representative wrote in August 2016. (Binder B, pp. [293-303](#))
- In April 2016, an LAPD sergeant in the West Los Angeles division worked with Ring to distribute promotional material in the station that would allow all station personnel to receive a free Ring camera. Numerous officers and civilian personnel then contacted Ring for free cameras. "Ring.com (the maker of the Ring Video Doorbell) is offering WLA personnel only one free Ring Stick-Up Cam. The Stick-Up cam is weather resistant and can be placed anywhere, to see, hear, and speak

- with your visitors,” the sergeant wrote in his message to staff. (Binder B, p. [47](#)). At least 20 officers requested free Ring cameras in the coming days and weeks.
- In April 2016, two LAPD officers from the Pacific Division turned up in person at Ring’s headquarters to inquire about Ring’s premium cameras. A representative wrote back the next day to ask for their shipping addresses. That was followed by further communication about promo events and community meetings where Ring could promote its product. “I could sense a tremendous amount of energy in your voice,” the Ring representative wrote. “That energy is going to translate through myself...so that every member of the community can have a Ring Video Doorbell.” (Binder B, pp. [114-115](#))
 - In March 2016, the LAPD Officer in Charge (OIC) of the Gang and Narcotics Division’s Special Electronic Unit asked Ring’s Chief Technology Officer to provide a quote for 20 Ring cameras to put in locations under investigation. Rather than provide an estimate, a Ring representative agreed to send the cameras free of charge. Three months later, the LAPD OIC contacted Ring to seek a quote for six more cameras with solar chargers for an investigation into a church burglary. Again, Ring provided the cameras free of charge, but this time the Ring representative added, “If the church sees value in the devices, perhaps it’s something that they can talk about with their members. Let’s talk more about this on the phone, but for now, I’ll get those devices sent out ASAP.” (Binder B, pp. [1241-1245](#))
 - In April 2016, a Ring representative met with an officer in LAPD’s Hollenbeck division to discuss “[h]ow Ring can help reduce crime in your neighborhood.” The next day, the Ring representative sent the officer a free Ring camera worth \$200. The LAPD officer then promised to speak to Hollenbeck Division’s lead officers “about the effectiveness of the unit so they can relay information to the citizens here in Hollenbeck.” In the same thread, the officer also asked Ring to donate even more cameras to be raffled off at the Police and Business Association of Hollenbeck’s annual golf tournament. Ring agreed, and after the tournament Ring asked the officer to provide him with “neighborhood watch, crime prevention fairs or safety events” where Ring could promote its product. The Hollenbeck officer also connected the Ring representative with contacts in the Manhattan Beach Police Department. (Binder B, pp. [34](#), [426](#), [692](#), [744-746](#), [2154](#))
 - In April 2016, Ring sent an LAPD detective in the Harbor Division a free Ring camera, then followed up seeking an introduction to neighborhood watch groups, including a group called Cyberwatch in San Pedro. (Binder B, p. [193](#))
 - In July 2016, Ring provided an LAPD Community Relations Division officer with a free Ring camera after learning the officer was actively promoting the product. “I’m happy to hear you’ve been talking about Ring and video doorbell technology with your community. I’d love to help you get situated with some flyers. I have also put in an order for a video doorbell for you,” the Ring representative wrote. (Binder B, p. [530](#))

- In May 2016, an officer in the LAPD Hollywood Community Relations Office agreed to a meeting with Ring after the company offered to send him a free camera. (Binder B, p. [2115](#))
- In August 2016, an LAPD officer in the Van Nuys Division reached out to Ring to discuss “a first alert system” to prevent break-ins. In the same email, the officer asked Ring to sponsor a “Cops & Cowboys” fundraising event for LAPD by providing free cameras for prizes. Ring CEO Jamie Siminoff agreed to provide the cameras. (Binder B, pp. [263-264](#))
- In July 2016, an LAPD officer invited Ring to set up a table to promote its products at a National Night Out event. In a follow-up email, the officer asked Ring for a discount code that he would provide to his wife. The office also asked Ring to donate a camera as a prize for a fundraiser for the officer’s division. Ring agreed on one condition: “Would you be willing to distribute promotional materials if we did?” the Ring representative asked. The officer responded: “[o]f course.” (Binder B, pp. [304-319](#))

It is also evident from the emails that some LAPD officers recognized they were treading a thin line with regard to their relationship with Ring.

- In April 2016, an LAPD Harbor Division officer began distributing information about Ring products and a discount code at community meetings. The officer wrote to Ring saying: “I got the go ahead from my Sergeant to put the promo code out to our community...[s]he cautioned me to word the email so that it won’t appear that we are endorsing the product, merely offering it as an option among others for home security.” Nevertheless, the officer steadily promoted Ring at community events and in discussions with various block captains, and even offered for Ring to attend community meetings. Ring regularly communicated with the officer to discuss whether community members were using the discount code. (Binder B, pp. [2050-2056](#))
- In July 2016, a member of LAPD’s West LA Division planning for a department beach party solicited a donation of Ring products to raffle off at the event, while indicating that the request may be inappropriate. “We use our measly station fund and buy some gifts to raffle off as prizes. Without me asking, do you see where I’m going with this email?” The representative from Ring indicated that they remembered the event from the previous year and could donate a Ring doorbell and solar powered security sign. (Binder B, p. [718](#))
- In May 2016, an LAPD officer in the Wilshire Community Relations Office asked Ring to speak about its products at a community event. “I spoke with my Sargent [sic]. He spoke with the Captain about your product. He likes the product and would like you to spoke [sic] about the product. The only issue is selling the product. Due to the fact that we are holding the meeting on City of Los Angeles property, you will not be able to talk about pricing during the meeting. You can

hand out your business [cards] and talk to the community on the side regarding pricing.” (Binder B, pp. [1934-1937](#))

The LAPD Code of Ethics states that officers will not accept “any gifts, gratuities or favors of any kind which might reasonably be interpreted as an attempt to influence their actions with respect to City business.” The Code of Ethics further states that officers “shall not use or attempt to use their position to secure unwarranted privileges or exemptions for themselves or others.” LAPD’s policy manual also includes a prohibition on endorsements of products and services: “The Department’s position of providing fair and impartial service dictates that each employee must scrupulously avoid using his/her official capacity, title, or position in the Department to endorse any organization, program, product, or service” unless it is required for performance of their duties and has been approved by the both the Chief of Police and the Police Commission.

These policies are crucial to ensuring that law enforcement officers act without bias and in the public interest. However, these emails indicate a calculated effort to undermine the integrity of the LAPD for commercial gain; at the same time, the emails show that at all levels of the LAPD there was a willingness to disregard these ethical guidelines.

As Ring said in a 2016 blog post, “Fear sells.” Ring marketers have operated on the assumption that the more individuals that fear crime in their communities, the more likely they will be to purchase cameras. There is a major concern, however, that the fear police are promoting when they encourage the adoption of Ring cameras may be misplaced. As police take it upon themselves to promote the expansion of Ring and introduce Ring representatives to homeowners and community groups, pecuniary entanglements such as those demonstrated in emails between the LAPD and the company introduce a specter of doubt. Is a home security camera necessary to contend with rising rates of crime, or are police advocating for the adoption of Ring cameras as a favor for a company that has provided them and their colleagues with merchandise?

These emails also provide a window into a potentially more widespread collaboration between law enforcement across the state and Ring. Ring has established partnerships with more than 140 law enforcement agencies in California. News reports have identified similarly problematic Ring cameras-for-promotion arrangements with other California police departments, such as the El Monte Police Department. In the emails, a Ring representative told an LAPD officer about a new contact he made in the Manhattan Beach Police Department: “He is still getting his feet wet because it is his first week but I think we are going to create a good relationship between the two of us.” Ring partnerships also extend to 18 sheriff offices in California.

Because of the cross-jurisdictional scope of this issue, we feel that the California Department of Justice is the appropriate law enforcement entity to examine this issue. Therefore, as the state chief law enforcement officer, we request that you intervene and initiate a public integrity investigation into Ring, LAPD, and other California law

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enforcement agencies where personnel have accepted gifts from Ring or publicly promoted its products.

Please do not hesitate to contact me if you have any questions. I can be reached at matthew@eff.org or (415) 436-9333. Thank you for your attention to this matter.

Sincerely,

Matthew Guariglia
Policy Analyst
Electronic Frontier Foundation