



City Council

August 12, 2025
Packet Addendum #1



Flock Safety – License Plate
Reading Camera System and
Technology Discussion
City Council – August 12, 2025

Presented by:
City Manager - Diana Langley



Colorado – Division of Criminal Justice

In Detail: Automated License Plate Readers, Mindy Duong, May 2024

- ALPR Usage for Officers
 - Hotlists automatically identify and track vehicles (and plates) of interest and send alerts when hit.
 - Increase arrest rates due to quicker response times using real-time data and alerts
 - Collect millions of vehicle and plate data to investigate current and past crimes
 - Data collected can provide a geographic timeline of vehicle travel patterns
- Controversies & Ethical Considerations
 - Infringement on privacy and civil liberties
 - Lack of consistent state or federal regulations on data retention and usage raises questions of how information is stored, shared, and protected.
 - Risk of misuse or unauthorized access



Colorado – Division of Criminal Justice In Detail: Automated License Plate Readers, May 2024

▪ Summary of Arguments For and Against ALPR

	Arguments for ALPR	Arguments Against ALPR
1	Law Enforcement Benefits	Privacy Concerns
2	Efficiency	Data Security
3	Traffic Management	Misuse of Data
4	Amber Alerts and Missing Persons	Accuracy Issues

Numerous Recent Articles

- Stanley, J. (2025, August 7). *Surveillance company Flock now using AI to report us to police if it thinks our movement patterns are "Suspicious"*. ACLU. <https://www.aclu.org/news/national-security/surveillance-company-flock-now-using-ai-to-report-us-to-police-if-it-thinks-our-movement-patterns-are-suspicious>
- Colorado News Collaborative. (2025, August 10). *Frequent immigration-related searches of Denver Flock camera data revealed in logs*. KUNC. <https://www.kunc.org/news/2025-08-10/frequent-immigration-related-searches-of-denver-flock-camera-data-revealed-in-logs>
- Manzanares, K. (2025, July 16). *Federal license plate reader searches raise surveillance questions*. VPM. <https://www.vpm.org/news/2025-07-16/flock-license-plate-readers-ice-atf-rva-edwards-kaiser-aclu-cherian>

ACLU White Paper

Fast-Growing Company Flock is Building a New AI-Driven Mass-Surveillance System, Jay Stanley, March 2022

1. Public/private license-scanning network
2. Centralization of data
3. Accuracy problems
4. Beyond license plates
5. Expanding analytics
6. Privacy practices
7. System of mass surveillance
8. Legal analysis

ACLU White Paper

Fast-Growing Company Flock is Building a New AI-Driven Mass-Surveillance System, Jay Stanley, March 2022

- Recommendations
 - Any non-hit data should be permitted to be held only for very short periods of time
 - No hot lists should be used unless they are certified by independent auditors as meeting the highest standards of due process, legitimacy, and reliability
 - Law enforcement agencies should not share license plate reader data with third parties that do not conform to the above principles and should be transparent regarding with whom license plate reader data is shared
 - Communities and their elected representatives should be especially hesitant to embrace networked surveillance cameras
 - Communities that have not yet enacted a Community Control Over Police Surveillance (CCOPS) ordinance should not permit the police that serve them to deploy surveillance cameras without first receiving approval from the city council or other elected governing body.

Potential Approaches

How to Pump the Brakes on Your Police Department's Use of Flock's Mass Surveillance License Plate Readers, Chad Marlow and Jay Stanley, Feb. 2023

▪ Data Retention

- Most Restrictive – ALPR photos or data captured shall be deleted or destroyed by Flock no more than 3 minutes after such photos or data are first captured by, provided to, or shared with Flock
- Moderately Restrictive – ALPR photos or data shall be deleted or destroyed by Flock no more than 72 hours after such photos or data are first captured by, provided to, or shared with Flock
- Least Restrictive – Data is stored for no longer than 30 days in compliance with Flock's records retention policy

Potential Approaches

How to Pump the Brakes on Your Police Department's Use of Flock's Mass Surveillance License Plate Readers, Chad Marlow and Jay Stanley, Feb. 2023

▪ Data Sharing/Use by Others

- Most Restrictive – ALPR photos or data captured shall not be sent to, shared with, or used by or for any other person or entity.
- Moderately Restrictive – ALPR photos or data shall not be sent to or shared with any other person or entity unless (1) permission to do so is granted in writing, and (2) the request pertains to the investigation of an Amber Alert or a violent felony.
- Least Restrictive – Flock may access, use, preserve and/or disclose the ALPR footage to law enforcement authorities, government officials, and/or third parties

Potential Approaches

How to Pump the Brakes on Your Police Department's Use of Flock's Mass Surveillance License Plate Readers, Chad Marlow and Jay Stanley, Feb. 2023

- Database Use

- Most Restrictive – In addition to the language noted below, add that ALPR photos or data captured or shared may be compared only to hot lists created by the government agency that provided the ALPR photo or data.
- Moderately Restrictive – In addition to the language noted below, include the following, “Warning: The database producing this hit/flag does not comply with the 1974 U.S. Privacy Act’s accuracy and completeness requirements. As such, this hit/flag may be inaccurate and must be independently confirmed before it is acted upon.”
- Least Restrictive – Agency grants Flock a non-exclusive, worldwide, perpetual, royalty-free right and license to...enable law enforcement monitoring against law enforcement hot lists as well as provide footage search access to law enforcement for investigative purposes only

From: [H.M](#)
To: [City Council](#); [City Managers Office](#); [H.M](#)
Subject: Special Meeting - Stop Flock Community Mass Surveillance Cameras
Date: Sunday, August 10, 2025 1:21:54 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear City Council Members and City Staff,

I fully support the Council in continuing to restrict and terminate the use of cameras to mass surveil our community. Do not renew this contract to reactivate twenty-five cameras and direct their lenses and databases at us and our visitors as we travel in our neighborhoods, and on the major roads and gateways throughout our city and then share this data with outside groups. The civil rights of our residents and visitors far outweigh the limited and inconclusive policing benefits attributed to these mass surveillance systems.

In 2022 the Council approved a contract to install twenty-five Flock surveillance cameras focussed on neighborhood fire re-construction areas with the goal of impacting construction materials theft because no one lived there during the construction and the area was difficult to fence and secure. In the following years, the Police Department has submitted requests to renew the contract for two year periods and relocate the cameras to surveil “major arterial roadways” throughout Louisville. In the past 2 years the Council has continuously, prudently voted to restrict cameras to the fire areas, limit the contract renewal to one year instead of two and limit access to the data to 85 agencies in CO.

Then just 3 months ago, we made even more progress toward dismantling this community monitoring system - “Due to continued concerns with data sharing and potential access by out-of-state law enforcement and federal agents, on June 30, 2025, the LPD was directed to disable its use of the system.”

But that progress may be lost because in the Special meeting this Tuesday, August 12, 2025, to discuss pending litigation in executive session, the only public agenda item is [a Flock Camera Update and a request to reinstate and continue using the community surveillance technology](#). Per the packet memo, the Flock camera service “costs for 2026 have not been included in the 2026 budget. The Service Agreement renewal request is scheduled to be presented to Council on August 19, 2025.” This lack of transparency and accountability in the budget process is concerning. Just this weekend, [KUNC reported on Denver Flock data being used for immigration searches and concern about employing city](#)

[budget processes to avoid canceling the Flock contract.](#)

The greatest concern is the proposal to continue to the use of technology to conduct mass surveillance of our community, roughly equivalent to putting trackers on everyone's cars, and then storing and sharing this data with agencies across the state and eventually potentially with government enforcement agencies across the country and a growing list of third parties under the standard Flock terms of use.

I am in full agreement with the ACLU on Flock/mass surveillance of folks in the name of crime management - don't do it.

ACLU's Concerns:

The **American Civil Liberties Union (ACLU)** has raised serious alarms about Flock's technology, calling it a form of **mass surveillance** that:

- Tracks people's movements without warrants
- Creates centralized databases accessible to law enforcement nationwide
- Lacks sufficient oversight or regulation
- Can be used to perpetuate and expand systemic bias/racism
- Can be used to persecute and potentially prosecute people in the name of immigration control, access to reproductive rights, exercising LGBT+ rights, and free speech.

The ACLU argues that this system could be abused to:

- Monitor political dissent
- Target marginalized communities
- Chill free movement and association

Worse yet:

- [Flock has begun using AI to analyze driving patterns and flag “suspicious” behavior—even if no crime has occurred.](#)
- [In Wisconsin, vague or unjustified search reasons were logged](#), such as “investigation” or even “had an abortion,” sparking outrage over misuse.

In Denver, for example, [the ACLU described the city’s use of Flock cameras as “Orwellian.”](#) warning that the system could be exploited by federal agencies for political purposes.

<https://denverite.com/2025/04/03/denver-flock-license-plate-readers-arrests-contract-extension/>

Here are some of the numbers: 170 recovered cars, \$350K for 1 yr Flock pilot (\$660K for two more years), citizen's civil rights - priceless.

Flock claims it balances safety and privacy by:

- Retaining data for only 30 days (unless local laws require otherwise)
- Not using facial recognition
- Requiring justification for database searches
- Expanding other agency and customer access

However, critics argue that these safeguards are **voluntary**, not legally binding, and can be bypassed or changed without public input or any control of third party use or abuse of this data.

If you asked Louisville residents if it would be okay with them if the government, without a warrant, was going to track your car 24/7 in all locations, store this information for 30+ days and share that information with other agencies and third parties and compare it to "hot lists" and special requests, they would NOT support this.

The ACLU lays out their concerns with this technology in a [March 2022 white paper on Flock](#), and in a [2013 report on law enforcement use](#).

https://www.aclu.org/wp-content/uploads/publications/flock_1.pdf

<https://www.aclu.org/files/assets/071613-aclu-alprreport-opt-v05.pdf>

Please terminate the Flock contract and remove the cameras to protect the safety of our democratic society - our civil rights.

Sincerely yours,

Helen Moshak

Louisville Resident

From: [sbasker](#)
To: [City Council](#); [City Managers Office](#)
Subject: Remove Flock cameras
Date: Tuesday, August 12, 2025 8:48:07 AM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear City Council Members and Staff,

I urge you not to renew the Flock contract or reinstate the 25 surveillance cameras across Louisville. These systems amount to mass surveillance—tracking residents and visitors without warrants, storing data, and sharing it with parties outside the city. This year, [the Denver City Council decided to terminate their contract for these cameras and data collection](#). The civil rights risks far outweigh any limited policing benefits. This money is better spent in direct support of police training and salaries.

In 2022, the cameras were approved for fire reconstruction zones. Since then, the Council has wisely restricted their use and access. Just three months ago, the system was disabled due to concerns about data sharing with out-of-state and federal agencies. Reinstating it now would reverse that progress.

Mass surveillance should not be quietly budgeted or normalized. The ACLU warns that Flock's technology enables warrantless tracking, centralized databases, and AI-driven profiling—tools that can be used to target marginalized communities, chill free speech, and undermine democratic freedoms.

Please protect our community's civil rights. Terminate the Flock contract and remove the cameras. Thank you.

Sincerely,
Scott Baskerville
Louisville Resident

From: [Katie Lacz](#)
To: [City Council](#)
Subject: Concerns about Flock ALPR cameras
Date: Monday, August 11, 2025 9:42:45 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

To the City Council,

I am writing as a resident of a street heavily impacted by the Marshall Fire, and I live several houses down from where a Flock camera sits on our corner. I was concerned about data privacy and potential misuse of information when the cameras were initially installed, and those concerns have only increased since the [investigative reporting of 404 Media](#) has shown the ways that Flock has allowed ICE and other agencies to use data for immigration enforcement and even to track the movement of women suspected of having an abortion.

I believe in the good-faith efforts of the City of Louisville and the police department to protect our data. However, Flock has shown itself to be an untrustworthy partner and an enabler of some of the worst actors in our federal government as they terrorize undocumented people.

Our comprehensive plan's vision statement describes Louisville as "an equitable, resilient, and sustainable community where everyone has the opportunity to thrive." Continuing to use Flock, given its willingness to share data broadly and given that Louisville's data was shared with other agencies, would compromise our values at a time when every local jurisdiction must speak up in the clearest terms against the spread of fascism that is occurring in our country. A creeping surveillance state harms democracy, even at the local level.

I understand the benefit of lowering the rate of property crime, and celebrate that Louisville's rate has decreased, but I believe that there are too many competing factors from the rebuilding after the Marshall Fire to be able to draw a straight line between the installation of the Flock cameras and the reduction of property crime. The benefits, therefore, are questionable and the harms are real and unignorable. I urge the council, the police department, and the city at large to cease using Flock and find other creative, community-oriented ways to keep our community safe.

Thank you for your time and for your good work.

Sincerely,

Katie Lacz
874 W Mulberry St.

From: [Cathern Smith](#)
To: [City Council](#); [Diana Langley](#)
Subject: FLOCK Does Not Strike the Right Balance Between Public Safety & Individual Privacy
Date: Monday, August 11, 2025 3:55:09 PM
Attachments: [image.png](#)
[image.png](#)

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor Leh and Members of City Council,

Thank you for disabling Louisville's FLOCK surveillance system in June. This technology does not strike the right balance between public safety and individual privacy. FLOCK has served its purpose and should not be renewed --especially not now.

Through DOGE, the federal government has already vacuumed up unprecedented quantities of private and personal data that it is consolidating for reasons that have not been fully disclosed. The City should not collect data that may ultimately be used to foster federal surveillance, harming individuals and our democracy, reproductive freedom, and civil rights.

These concerns are not hypothetical.

There is an open, formal Congressional investigation into the Flock Group Inc. The impetus for this investigation includes a "case in which a Texas sheriff's office used Flock's 'National Lookup' tool to search for a woman who accessed reproductive care." The Texas sheriff's office apparently used the search query "had an abortion, search for female." The resulting search "reportedly spanned over 6,800 networks and pulled data from more than 83,000 cameras." Some of the cameras were in "states [like Colorado] where abortion remains legal." <https://krishnamoorthi.house.gov/media/press-releases/ranking-members-krishnamoorthi-and-garcia-demand-accountability-flock-group> These databases - combined with the fact that activists opposing reproductive health care document the plates of patients and providers who visit reproductive healthcare facilities - mean that nationwide hunts are possible with just a few key strokes. And, without a finding of probable cause that a crime has been committed. <https://www.eff.org/deeplinks/2025/05/she-got-abortion-so-texas-cop-used-83000-cameras-track-her-down>

The investigating Congressmen also point to the fact that "a Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) analyst reportedly accessed Richmond, Virginia's Flock network to conduct immigration-related queries, despite the city's explicit policy barring such cooperation with federal agencies." (Emphasis added.) <https://krishnamoorthi.house.gov/media/press-releases/ranking-members-krishnamoorthi-and-garcia-demand-accountability-flock-group> Thus, there is no question that the federal government will use FLOCK when it can to further this administration's immigration agenda.

Your decision is made easier by the fact that the FBI reports that both violent crimes and property crimes are declining in Colorado Cities with populations from 10,000 to 24,000.

Copy of query submitted

at <https://cde.ucr.cjis.gov/LATEST/webapp/#/pages/explorer/crime/query>

Query Creator

All queries require a year range, at least one crime type, and at least one location to be valid and submitted.

From: 2015 To: 2025 Crime Select (up to 3): All Violent Crimes, All Property Cri... Location Select: Colorado

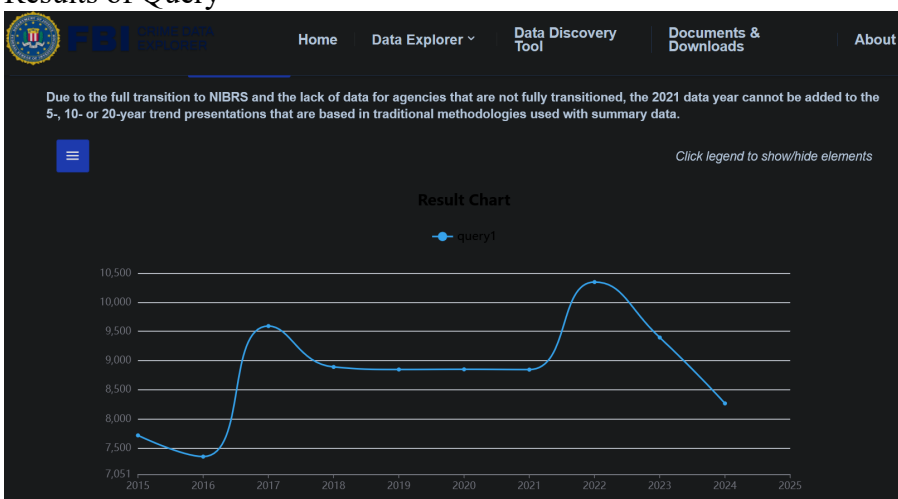
Agency Select (up to 10): e.g. Point Pleasant Polic... -or- Population Range (up to 5): Cities from 10,000 thru 24,999

ADD QUERY

DATERANGE : 2015-2025 OFFENSE : VIOLENT-CRIME OFFENSE : PROPERTY-CRIME STATEABBR : CO POPRANGE : 9

SUBMIT

Results of Query



To further inform your decision, here are some questions you may wish to ask:

- 1) Who are the legal owner(s) of the FLOCK data? If the City does not own the data (and most likely it doesn't), what are the legal and practical implications?
- 2) Which federal agencies or federal workers - including DOGE and immigration enforcers - have had access to FLOCK? What did they do with the information they got?
- 3) What, if anything, prevents FLOCK from entering into contracts with federal agencies, DOGE, or other federal actors?
- 4) What cybersecurity measures, including audits, does FLOCK take? Has FLOCK been breached?
- 5) What's the difference between an "ALPR alert" and a "hit."

Thanks for focusing on this important issue and please deny the request to continue using FLOCK.

Best,

Cathern Smith
Ward III

From: [Tiffany Boyd](#)
To: [Diana Langley](#); [City Council](#)
Subject: Terminate the use of surveillance cameras in Louisville
Date: Tuesday, August 12, 2025 2:46:45 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear City Council Members and City Staff,

I am writing to encourage the City of Louisville to terminate the use of surveillance cameras in our community. I ask you to prioritize the civil rights of our residents over the inconclusive policing benefits that these mass surveillance systems claim to have.

The City of Denver recently voted to terminate their use of surveillance cameras and there are communities throughout the country who are following suit.

I agree with the ACLU that Flock/mass surveillance of citizens in the name of crime management is against people's civil rights. Please terminate the Flock contract and remove the cameras to protect the safety and civil rights of all of us.

Sincerely,

Tiffany Boyd, Louisville Citizen

From: [tamar krantz](#)
To: [City Council](#); [Diana Langley](#)
Subject: Please remove flock cameras from Louisville
Date: Tuesday, August 12, 2025 2:45:36 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor, City Council Members, and City Manager Langley,

I hope you will vote to remove flock cameras from Louisville after your discussion on agenda item 2 tonight.

Thank you for disabling the cameras in June. I hope you will now decide to have them removed. They served their original purpose to provide security in the neighborhoods that were uninhabited after the fire.

I see that the Louisville Police Department is suggesting that they could use the Flock automatic license plate recognition (ALPR) technology more strategically. I don't believe that this is possible while still protecting our privacy.

Stories about misuse of the data worry me: Please see this story from yesterday from ACLU Colorado--

<https://www.aclu-co.org/press-releases/coalition-of-civil-rights-and-advocacy-organizations-deeply-concerned-about-use-of-flock-cameras-for-ice-surveillance/>

This says "Denver Police Department (DPD) released Flock audit logs that prove Denver data was searched more than 1,400 times for ICE since June 2024. This is more evidence conveying the serious threat the Flock mass surveillance system poses to the privacy and safety of not only immigrants in Denver, but across Colorado and the country."

I also advise you to look further into the statement in your packet that says, "The vast majority of community members have indicated their support for the use of the system for public safety purposes and see it as a valuable tool to assist in the LPD's effectiveness. Some members have relayed concerns about data privacy and the potential misuse of the information collected by Flock Safe." The data that our police department finds is probably strongly biased because of the self-selected group who participated in their engagement activities. Please do not base any decisions on an incomplete view of community desires.

I believe I am among many community members who prefer that the Flock ALPR systems were removed.

Thanks for considering this,

Tamar Krantz.
Louisville

From: [Jeff Boyd](#)
To: [City Council](#)
Subject: Surveillance of Louisville
Date: Tuesday, August 12, 2025 2:27:24 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear city council/staff,

I am writing to express my support to terminate the contract that is currently allowing portions of [Louisville.to](#) be under surveillance. Now more than ever we need to be building trust among the community and the police, and this type of para-military surveillance only erodes trust between law enforcement and the general public. Please end it now.

Sincerely,
Jeff Boyd

--

Jeff Boyd
WhizBang Design Company