

Communication from Public

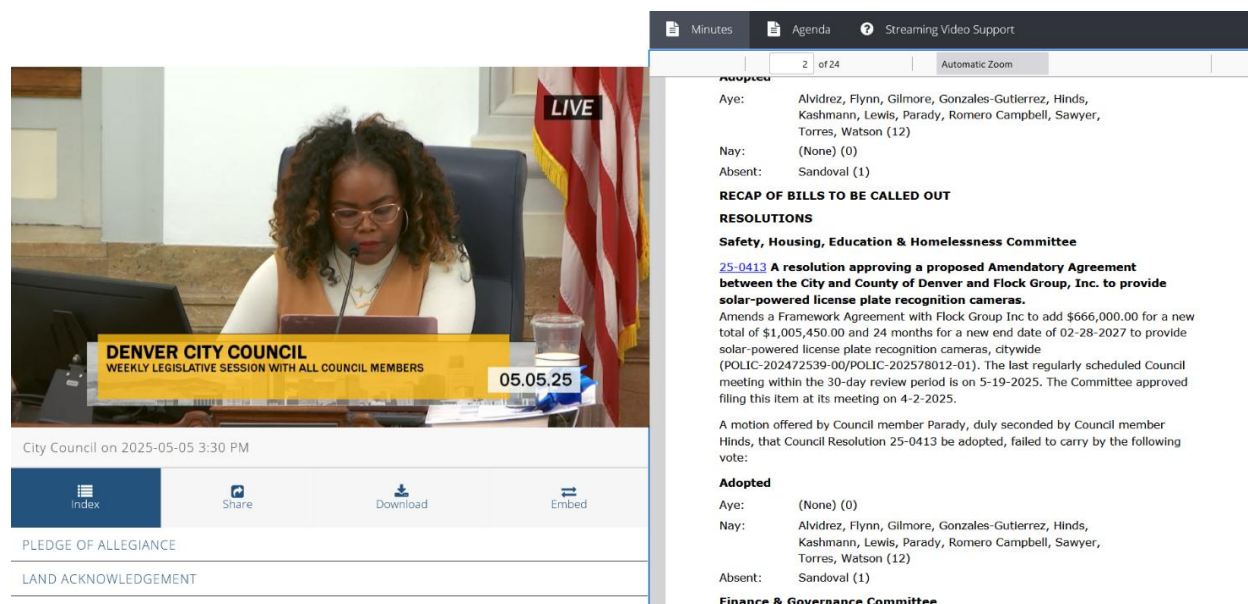
Name: William Kelly

Date Submitted: 08/18/2025 11:06 AM

Council File No: 25-0695

Comments for Public Posting: As a member of the NELA Alliance for Democracy, I request that you amend motion 25-0695 (item 6 on your August 19 agenda) to include a thorough review of how data produced by the city's network of automated license plate readers is managed and to ensure that it cannot go to ICE or be used for other improper purposes.

Time to Review Management of ALPR Data to Secure it from ICE



The image shows a live stream of a Denver City Council meeting. On the left, a woman with curly hair and glasses is speaking at a podium. A 'LIVE' banner is in the top right corner of the video frame. Below the video, a yellow banner reads 'DENVER CITY COUNCIL WEEKLY LEGISLATIVE SESSION WITH ALL COUNCIL MEMBERS' and '05.05.25'. Below that, a blue banner says 'City Council on 2025-05-05 3:30 PM'. At the bottom of the video player are buttons for 'Index', 'Share', 'Download', and 'Embed'. Below the video player are two links: 'PLEDGE OF ALLEGIANCE' and 'LAND ACKNOWLEDGEMENT'.

On the right, the agenda for the meeting is displayed. It includes sections for 'Adopted', 'Aye:', 'Nay:', 'Absent:', 'RECAP OF BILLS TO BE CALLED OUT', 'RESOLUTIONS', 'Safety, Housing, Education & Homelessness Committee', '25-0413 A resolution approving a proposed Ammendatory Agreement between the City and County of Denver and Flock Group, Inc. to provide solar-powered license plate recognition cameras.', 'A motion offered by Council member Parady, duly seconded by Council member Hinds, that Council Resolution 25-0413 be adopted, failed to carry by the following vote:', 'Adopted', 'Aye:', 'Nay:', 'Absent:', and 'Finance & Governance Committee'.

We request that the city review the use of automated license plate readers in a widely publicized participatory forum. Our request is based on recent revelations and concerns about data privacy and the use of data gathered through the cameras from the City of Los Angeles by U.S. Immigration & Customs Enforcement to deport immigrants without due process. The 2017 California Values Act (SB 54), with limited exceptions, prohibits state law enforcement agencies from providing information and assistance to ICE to enforce federal immigration laws (https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB54). Until you can launch and complete the review, we ask that you direct your police department to restrict all access to data collected by the automated license plate readers, except for internal use.

It has come to public attention that the City of Los Angeles uses a variety of automated license plate readers from various vendors, including Motorola, Vigilant Solutions, and Flock Safety. While Flock Safety has been in the news due to concerns about misuse of the data its cameras collect, it should be noted that data has been shared by the Los Angeles Police Department, and many other departments in California, with ICE, based on a Public Records Act request filed by Oakland Privacy and widely reported (<https://calmatters.org/economy/technology/2025/06/california-police-sharing-license-plate-reader-data/>). Specifically, the Los Angeles Police Department has provided data to ICE, a potential violation of the California Values Act. In addition, one of the license plate reader systems LAPD uses, Vigilant Solutions, has maintained a long-standing agreement with ICE to tap data captured by its cameras, which LAPD and other police

departments use across the nation (https://americandragnet.org/sites/default/files/2025-05/American_Dragnet_English_May2025.pdf, see page 21). Indeed, data collected by Vigilant Solutions from police department license plate readers has been offered for sale through Thomson Reuters for almost a decade (<https://www.thomsonreuters.com/en/press-releases/2017/june/thomson-reuters-brings-vigilant-license-plate-recognition-data-to-clear-investigation-platform>). Across the nation, Flock Safety camera data also has been provided to ICE in numerous instances, as it is widely shared and available through the company's national lookup service, unless otherwise restricted.

Since news broke of California data being shared with ICE and out-of-state law enforcement agencies for inappropriate uses, Flock imposed a firewall preventing California data from being tapped by law enforcement agencies in other states (<https://www.404media.co/flock-removes-states-from-national-lookup-tool-after-ice-and-abortion-searches-revealed/>). However, the company firewall is inadequate because it's become clear that California police agencies themselves are sharing data from Flock systems and other license plate readers with ICE.

In June, for instance, news reports revealed that California police agencies shared data with ICE and that one police agency in Escondido used Flock Safety automated license plate readers to track people participating in a demonstration against federal immigration policies (<https://calmatters.org/economy/technology/2025/06/california-police-sharing-license-plate-reader-data/>; <https://www.404media.co/california-cops-investigate-immigration-protest-with-ai-camera-system/>).

A recent news report by 404 media, for instance, detailed 4,000 instances of ICE gaining side-door access to data produced by the cameras from local law enforcement agencies, even in the sanctuary state of Illinois (<https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>). News of yet another data breach in Illinois prompted the Illinois Secretary of State to launch an inquiry into how license plate reader information is being handled (<https://www.ilsos.gov/news/2025/june/250612d1.pdf>).

Meanwhile, in Virginia, the U.S. District Court for Eastern District of Virginia has agreed to hear a suit filed by a nursing assistant and a Navy veteran contending that Norfolk's use of Flock Safety license plate readers constitutes a remote warrantless search in violation of Fourth Amendment (<https://ij.org/wp-content/uploads/2024/10/2024.10.21-1-Complaint.pdf?ref=404media.co>; <https://ij.org/press-release/judge-rules-lawsuit-challenging-norfolks-use-of-flock-cameras-can-proceed/>).

Earlier this spring, the Denver City Council decided to cancel a contract with Flock Safety when the police department proposed expanding the number of cameras deployed. Councilmembers cited concerns that federal agents were gaining access to license plate reader data as participants in a multi law enforcement agency task force in Northern Colorado

(https://denver.granicus.com/player/clip/16871?view_id=180&meta_id=1549910&redirect=true begins at minute 29). Similar concerns are now being raised in San Diego and in Texas, where the city of Austin canceled its contract with Flock Safety

(<https://www.eff.org/deeplinks/2025/06/san-diegans-push-back-flock-alpr-surveillance>; <https://www.eff.org/deeplinks/2025/06/victory-austin-organizers-cancel-citys-flock-alpr-contract>). The action in Austin came in conjunction with news that a Texas police officer

used a nationwide search of Flock Safety's license plate reader data base to locate a woman who went out of state for an abortion. Abortion is all but banned in Texas

(<https://www.theguardian.com/commentisfree/2025/may/31/a-dystopian-surveillance-fear-has-become-reality-in-texas>). Indeed, the Reason Foundation observed earlier this

summer that Flock Safety's database, which covers some 5,000 communities that use its system nationwide, can be used to access data nationwide as long as users, according to Flock, "are also opted into the National Lookup" service. It should be noted that Flock Safety users are not restricted to law enforcement agencies, but also include companies, homeowner and neighborhood associations,

etc. (<https://reason.com/2025/05/29/illinois-cops-gave-ice-access-to-more-than-5000-surveillance-cameras-nationwide/>). For instance, Home Depot stores, which have been

a key locus for ICE raids in Southern California, use the Flock system along with a thousand others (<https://foxsanantonio.com/newsletter-daily/san-antonio-retailers-turning-to-license-plate-readers-to-help-curb-theft>;

<https://losspreventionmedia.com/flock-safety-launches-first-ever-business-network-to-strengthen-private-sector-security-collaboration/>). In pursuit of its move fast and break things strategy, Flock late last year was admonished for failing to obtain a private investigator's license for placement of automated license plate readers on the premises of private businesses by the Texas Department of Public Safety

(<https://www.houstonchronicle.com/news/houston-texas/crime/article/flock-cease-and-desist-letter-19795715.php>).

Locally, the city of South Pasadena last month agreed to thoroughly review how data from Flock Safety cameras is secured from improper use and to review how it's contract with the company can be tightened to make the data more secure

(https://www.spectrumstream.com/streaming/south_pasadena/2025_07_16.cfm#; discussion begins at 1:42).

In conclusion, we do not dispute that automated license plate reader technology has public safety benefits. However, the growing and indisputable misuse of the technology--including by ICE to detain immigrants without due process, to arrest citizens who record raids on our streets, to restrict access to women's healthcare, and to potentially intimidate people from exercising their First Amendment rights by attending demonstrations--makes immediate restriction of the data and a review of how data is shared and used an urgent matter.

The bottom line, as observed by Denver Councilmember Kevin Flynn, is that concerns over surveillance have always been present, but that "since January 20" such concerns "have a new reality around them." It's time for Los Angeles to follow the lead of Denver and other cities and carefully and publicly scrutinize the Flock Safety contract.

Communication from Public

Name: William Kelly
Date Submitted: 08/18/2025 10:16 AM
Council File No: 25-0695

Comments for Public Posting: The Northeast Alliance for Democracy, a group of over 200 people in Northeast Los Angeles and contiguous communities formed after last November's election, calls on you to expeditiously approve the following motions: • Motion 25-0695 (Rodriguez) to create legal remedies against federal agencies that violate the constitutional rights of residents within the City; • Motion 25-0747 (Blumenfield, Hernandez) to require LAPD officers to verify the identity of any individual claiming to be a law enforcement officer; • Motion 25-0748 (Rodriguez) drafting a formal Freedom of Information Act request to the U.S Department of Homeland Security, U.S. Customs & Border Protection, and U.S. Immigration & Customs Enforcement to seek records that provide transparency into federal immigration enforcement activity within the City since January 1, 2025; and • Motion 25-0756 (Blumenfield, Hernandez) amending relevant sections of the Los Angeles Municipal Code to maximize any fines and fees associated with impersonating a federal, state, or local law enforcement agent. These motions will ensure that the City establishes an authoritative record of federal Immigration & Customs Enforcement agency actions and prevents imposters and ICE wannabes from kidnaping people off our streets. Citizen ICE patrols have been successful in helping attorneys get charges dropped against onlookers swept up by ICE and helping families locate their relatives within the federal detention system to provide legal aid. It is now time for the City to do the same by approving these directives. Yet, the motions are silent on another important matter, namely, how data collected through the City's automated license plate reader systems are securely managed, to prevent it from falling into the hands of ICE for use in arrests conducted with no warrants nor even a hint of probable cause beyond straight up racial profiling. As documented by Cal Matters in June (<https://calmatters.org/economy/technology/2025/06/california-police-sharing-license-plate-reader-data/>), the Los Angeles Police Department has provided data to ICE, a potential violation of the California Values Act. In addition, one of the license plate reader systems LAPD uses, Vigilant Solutions, has maintained a long-standing agreement with ICE to tap data captured by its cameras, which LAPD and other police departments use across the nation (https://americandraget.org/sites/default/files/2025-05/American_Draget_English_May2025.pdf, see page 21). Indeed, data collected by Vigilant Solutions from police department license plate readers has been offered for sale through Thomson Reuters for almost a decade (<https://www.thomsonreuters.com/en/press-releases/2017/june/thomson-reuters-brings-vigilant-license-plate-recognition-data-to-clear-investigation-platform>). Flock Safety camera data also has been provided to ICE in numerous instances, as it is widely shared and available through the company's national lookup service, unless otherwise restricted. Accordingly, we recommend that you amend one of the motions to require City staff to examine how data from LAPD's automated license plate reader systems are managed and to make sure that federal immigration authorities cannot access it in any way, except in association with the serious felony investigations outlined in the California Values Act. Sheila Pinkel William Kelly Alex Wiesenfeld Muriel Bartol Jasmine Rios Jessica Haye