

March 24, 2026

Chair Andrae, Vice-Chair Furman, and Members of the Dane County Board Public Protection & Judiciary Committee:

The ACLU of Wisconsin appreciates the opportunity to submit written comments in support of [2025 RES-403](#) to amend the 2026 Operating Budget for the Dane County Sheriff's Office to remove funding for the Flock automatic license plate reader (ALPR) system. **This decision comes at a critical moment, as communities across the country are being forced to confront the real-world consequences of adopting surveillance technologies that operate with limited oversight and far-reaching implications for civil liberties.**

### **What is Flock Safety?**

Flock Safety sells automated license plate readers and a centralized database platform used by thousands of law enforcement agencies nationwide and private entities such as business and homeowner associations. These cameras are not designed to target specific suspects or ongoing investigations. Instead, they **systematically collect data on every vehicle that passes**: recording location, time, and identifying details regardless of whether the driver is suspected of any wrongdoing.

This data is then stored, aggregated, and made searchable across a growing network of law enforcement agencies. In practice, this transforms a tool marketed for public safety into a system of **indiscriminate mass surveillance**, capturing the movements of entire communities rather than specific individuals under investigation.

### **A System That Cannot Be Meaningfully Limited**

Flock's surveillance network spans at least 5,000 police departments nationwide and at least 221 Wisconsin law enforcement agencies.<sup>1</sup> Even when jurisdictions attempt to impose restrictions on data sharing, the structure of Flock's network undermines those efforts. **Data collected in Dane County does not stay in Dane County.** Through network sharing and permissive contract language, that information can become accessible to agencies across the country.

Public records obtained by the ACLU reveal that Flock Safety's nationwide information sharing network allows external federal, state, and local law enforcement to access sensitive license plate data from municipalities and counties without a warrant or meaningful oversight. Police departments have also searched the nationwide database on behalf of the FBI, DHS, and Border Patrol. **Once data enters this system, local governments lose meaningful control over how it is used.**

This lack of control has already led to troubling outcomes.

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<sup>1</sup> "Analysis of Flock use by Wisconsin cops reveals trends, raises questions," Wisconsin Examiner (Aug. 6, 2025), <https://wisconsinexaminer.com/2025/08/06/analysis-of-flock-use-by-wisconsin-cops-reveals-trends-raises-questions/>.

The Department of Homeland Security has intensified surveillance use in immigration enforcement actions (which has targeted not only undocumented immigrants but also green card holders, others with various forms of legal status, and naturalized citizens). **Flock data have been used for federal immigration enforcement through side-door access provided by local law enforcement agencies.**<sup>2</sup> At the same time, the federal government has continued to invoke the specter of terrorism to target individuals based on ideology and opposition to the administration's actions and continues to weaponize surveillance technology against protesters and others expressing dissent.<sup>3</sup> According to an analysis by the Electronic Frontier Foundation, over 50 federal, state, and local **law enforcement agencies ran hundreds of Flock searches in connection with protest activity.**<sup>4</sup> A Texas sheriff's office conducted a nationwide search of more than 83,000 Flock cameras, giving the reason "**had an abortion, search for female**" in the search log.<sup>5</sup>

- In Syracuse, New York,<sup>6</sup> city councilors demanded to know how their local LPR data ended up being searched 4.4 million times by police around the country without a warrant and shared with ICE despite promises to the contrary.
- The Evanston<sup>7</sup> police department revoked out-of-state access to its ALPR database after revelations that the city's data had been subject to at least seven ICE searches, despite a state law that bans data sharing with ICE.
- In Richmond, Virginia<sup>8</sup> the police agreed to share LPR data with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). In June they found out that ATF had been making immigration-related searches without notifying the city.

This is not an abstract risk. Data collected in one state can be used to enforce laws in another, including laws that may directly conflict with local values and legal protections. If Dane County participates in this network, it risks contributing to surveillance pipelines that enable the criminalization of healthcare, immigration enforcement, and the targeting of protesters, activists, and political opponents through surveillance.

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<sup>2</sup> "ICE Taps into Nationwide AI-Enabled Camera Network, Data Shows," 404 Media (May 27, 2025), <https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>; "Flock Can Share Driver-Surveillance Data Even When Police Departments Opt Out, And Other Flock Developments," ACLU (Oct. 24, 2025), <https://www.aclu.org/news/privacy-technology/flock-massachusetts-and-updates>.

<sup>3</sup> Exec. Order No. 14161, 90 Fed. Reg. 8451, Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats, <https://perma.cc/82VD-C7ND> (Jan. 20, 2025); "ICE Wants to Go After Dissenters as well as Immigrants," Brennan Center for Justice (Nov. 21, 2025), <https://www.brennancenter.org/our-work/research-reports/ice-wants-go-after-dissenters-well-immigrants>.

<sup>4</sup> "How Cops Are Using Flock Safety's ALPR Network to Surveil Protesters and Activists," EFF (Nov. 20, 2025), <https://www.eff.org/deeplinks/2025/11/how-cops-are-using-flock-safety-s-alpr-network-surveil-protesters-and-activists>.

<sup>5</sup> "Flock Safety and Texas Sheriff Claimed License Plate Search Was for a Missing Person. It Was an Abortion Investigation." EFF (Oct. 7, 2025), <https://www.eff.org/deeplinks/2025/10/flock-safety-and-texas-sheriff-claimed-license-plate-search-was-missing-person-it>.

<sup>6</sup> "Syracuse police 'inadvertently' exposed driver data to thousands of cops around the country," Central Current (July 4, 2025), <https://centralcurrent.org/syracuse-police-exposed-driver-data-to-thousands-of-cops-around-the-country/>.

<sup>7</sup> "Council Bytes: EPD bars out-of-state agencies from plate reader network," Evanston Round Table (June 24, 2025), <https://evanstonroundtable.com/2025/06/24/evanston-alpr-network-access-restricted>.

<sup>8</sup> "Richmond police ban feds from tracking immigrants' license plate data," AXIOS Richmond (July 9, 2025), <https://www.axios.com/local/richmond/2025/07/09/immigrant-license-plate-tracking-richmond-police>.

Also profoundly concerning, according to U.S. Senator Ron Wyden and Congressman Raja Krishnamoorthi, Flock’s failure to require customers to use industry standard security measures to protect their accounts has led to serious cybersecurity breaches of Flock’s data.<sup>9</sup> In a letter calling on the FTC to investigate the company, these members of Congress pointed to at least 35 cases in which Flock passwords had been stolen, and evidence “from a Russian-language cybercrime forum in which Flock accounts appear to be offered for sale.”

### **Documented ALPR Misuse by Local Law Enforcement**

In addition to the weaponization of ALPR surveillance by the federal government and other jurisdictions, there is a well-documented pattern of misuse by local law enforcement officers themselves. In Wisconsin—officers are alleged to have used ALPR systems repeatedly for personal, non-investigative purposes.

- In January 2026, Menasha, Wisconsin police officer Cristian Morales was charged with misconduct in office for allegedly using a license plate reader system to track his ex-girlfriend.<sup>10</sup>
- In February 2026, Milwaukee police officer Josue Ayala was charged with misconduct in office for allegedly using Flock to search the license plate of his romantic partner 124 times and the license plate of his partner’s ex 55 times within a three-month time period.<sup>11</sup> According to the criminal complaint, Ayala entered “investigation” as the reason for each search. The alleged misuse was only uncovered after a victim searched their license plate on “HaveIBeenFlocked.com” and alerted police.
- Former Kenosha County Sheriff Deputy Frank McGrath allegedly used Flock to search the whereabouts of another Kenosha deputy that he was dating, entering “suspicious” as the search reason in the system.<sup>12</sup>

Nationally, the pattern is even more extensive:

- In 2024, Lee Nygaard, the former police chief of Sedgwick, Kansas, used Flock automatic license-plate reader (ALPR) cameras to track his ex-girlfriend’s vehicles 228 times over more than four months — and even followed her and her new boyfriend in his police car.<sup>13</sup>

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<sup>9</sup> Letter from Senator Ron Wyden and Representative Raja Krishnamoorthi, to Federal Trade Commission Chair Andrew N. Ferguson (Nov. 3, 2025), <https://www.documentcloud.org/documents/26212269-wyden-flock-ftc-letter/>.

<sup>10</sup> “Menasha police officer accused of license plate recognition system to track his ex,” Fox 11 News (Jan. 9, 2026), <https://fox11online.com/news/crime/menasha-police-officer-accused-of-using-license-plate-recognition-system-to-track-his-ex-girlfriend-cristian-morales-misconduct-in-office-flock-domestic-abuse-restraining-order-cash-bond>.

<sup>11</sup> “Milwaukee Cop Used Flock Cameras to Track Romantic Partner,” Urban Milwaukee (Feb. 25, 2026), <https://urbanmilwaukee.com/2026/02/25/milwaukee-cop-used-flock-cameras-to-track-romantic-partner/>.

<sup>12</sup> “Wisconsin communities grapple with police misuse of Flock surveillance,” Wisconsin Examiner (March 13, 2026), <https://wisconsinexaminer.com/2026/03/13/wisconsin-communities-grapple-with-police-misuse-of-flock-surveillance/>.

<sup>13</sup> “Police chief gets caught using license plate cameras to track his ex-girlfriend 228 times,” WKRC (Aug. 8, 2024), <https://local12.com/news/nation-world/police-chief-gets-caught-using-license-plate-cameras-to-track->

- Michael Steffman, the former police chief of Braselton, Georgia, was arrested for allegedly using ALPR systems to stalk and harass multiple private citizens who were not being investigated for crimes.<sup>14</sup>
- An officer in Sandy Springs, Georgia resigned in October 2025 after alleged use of Flock searches on behalf of a public safety software startup of employees and their families.<sup>15</sup>
- Jarmarus Brown of Orange City Police Department in Florida, who reportedly ran his girlfriend's and her family's plates over 100 times in a seven-month span — are misusing surveillance tools to abuse.<sup>16</sup>

These examples illustrate a consistent reality: misuse is not rare, and it is not prevented by policy alone. When systems allow for the tracking of individuals at scale, abuse becomes an inherent risk.

### **Mass Surveillance vs. the Illusion of Public Safety**

The risks of overreach are further illustrated by cases such as Lee Schmidt in Norfolk, Virginia. Lee Schmidt, a retired veteran, who was not actively being investigated had his location pinged 526 times between Feb. 19 and July 2, 2025 according to a court filing.<sup>17</sup> That is a rate of nearly four times per day that an innocent American citizen was tracked by Flock.

According to an analysis of Flock audit data from the Wisconsin Examiner detailing Flock searches from Wisconsin law enforcement agencies between January 1 – May 28, 2025, the most commonly used search term was simply “investigation.”<sup>18</sup> There is little to no public insight into what those “investigations” actually entail, who is being targeted, or whether these searches are tied to legitimate criminal activity at all. Without clear reporting, auditing, or disclosure requirements, the term becomes a catch-all justification for accessing a mass surveillance system—one that allows law enforcement to track the movements of individuals without the public ever knowing why.

Supporters of Flock systems often frame them as tools for solving crimes, but this framing obscures their true scope. **Flock does not selectively monitor individuals suspected of wrongdoing—it monitors everyone.**

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[his-ex-girlfriend-228-times-arrests-charges-probation-flock-safety-follow-stalk-new-boyfriend-broke-up-out-of-town-misuse.](#)

<sup>14</sup> “Georgia police chief charged with using license plate readers to stalk and harass people,” AP (Nov. 20, 2025), <https://apnews.com/article/georgia-plate-readers-stalk-harass-chief-arrested-39adb6f89fc2074da61f2801fef3f180>.

<sup>15</sup> “Sandy Springs officer resigns amid Flock misuse investigation,” Appen Media (Oct. 10, 2025), [https://www.appenmedia.com/news/sandy-springs-officer-resigns-amid-flock-misuse-investigation/article\\_b2aa4213-4acc-4098-9f94-2ec986165bac.html](https://www.appenmedia.com/news/sandy-springs-officer-resigns-amid-flock-misuse-investigation/article_b2aa4213-4acc-4098-9f94-2ec986165bac.html).

<sup>16</sup> “Cop stalks girlfriend, runs her license plate 70 times in 7 months, Florida cops say,” Miami Herald (Feb. 7, 2025), <https://www.miamiherald.com/news/state/florida/article299881644.html>.

<sup>17</sup> “Police cameras tracked one driver 526 times in four months, lawsuit says,” NBC News (Sept. 18, 2025), <https://www.nbcnews.com/tech/security/virginia-police-used-flock-cameras-track-driver-safety-lawsuit-surveil-rcna230399>.

<sup>18</sup> “Analysis of Flock use by Wisconsin cops reveals trends, raises questions,” Wisconsin Examiner (Aug. 6, 2025), <https://wisconsinexaminer.com/2025/08/06/analysis-of-flock-use-by-wisconsin-cops-reveals-trends-raises-questions/>.

## **A Growing National Reconsideration of Flock**

Policymakers are beginning to recognize that the boundaries between local surveillance and the Trump Administration are hard to maintain; if you collect data on your residents' comings and goings, it will be difficult to keep that from being used in unintended ways. As a result, many jurisdictions across the country are cancelling their Flock contracts or rethinking their use of this surveillance technology.<sup>19</sup> Even within Wisconsin, communities have started to push back, acknowledging that the long-term consequences of mass surveillance often outweigh its perceived benefits.

Jurisdictions deactivating Flock cameras or terminating contracts in recent years include:

- Flagstaff, AZ
- Sedona, AZ
- South Tuscon, AZ
- Los Altos Hills, CA
- Mountain View, CA
- Richmond, CA
- Santa Cruz, CA
- South Pasadena, CA
- Denver, CO
- Longmont, CO
- Coralville, IA
- Evanston, IL
- Oak Park, IL
- Cambridge, MA
- Greenfield, MA
- Natick, MA
- Watertown, MA
- Hillsborough, NC
- Scarsdale, NY
- Syracuse, NY
- Bend, OR
- Eugene, OR
- Lane County, OR
- Springfield, OR
- Woodburn, OR
- Warren, RI
- Austin, TX
- Hays County, TX
- San Marcos, TX
- Charlottesville, VA
- Staunton, VA
- Lynnwood, WA
- Mountlake Terrace, WA
- Prosser, WA
- Skamania County, WA
- Walla Walla, WA
- Verona, WI

Given the inability to meaningfully restrict data sharing, the expansion of federal surveillance under the Trump administration, the documented misuse by law enforcement, and the fundamentally indiscriminate nature of this technology, **we respectfully urge the Dane County Board to discontinue funding for Flock Safety cameras and related surveillance systems.**

This decision is not simply about one contract or one technology. It is about whether Dane County will endorse a model of public safety built on mass surveillance, or whether it will prioritize privacy, civil liberties, and democratic accountability. Once this infrastructure is expanded, it becomes extraordinarily difficult to dismantle. **The time to act is now.**

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<sup>19</sup> "Police cameras track billions of license plates per month. Communities are pushing back," NBC News (Jan. 1, 2025), <https://www.nbcnews.com/tech/tech-news/flock-police-cameras-scan-billions-month-sparking-protests-rcna230037>; "Why some cities are ditching their Flock license plate readers," NPR (Feb. 19, 2026), <https://www.npr.org/2026/02/17/nx-s1-5612825/flock-contracts-canceled-immigration-surveillance-concerns>;