

February 4, 2026

Chair Dimitrijevic, Vice-Chair Burgelis, and Members of the Finance & Personnel Committee:

The ACLU of Wisconsin appreciates the opportunity to submit a written comment regarding Item 16 on this morning's agenda, File # [251653](#) (Communication from the Department of Administration informing the Finance and Personnel Committee of waivers granted for certain single or sole source contracts or contract amendments)—specifically, the waiver granted for contract number **E21123 regarding a vender service contract for Flock license plate reader cameras and related services from Flock Group, Inc.**

It appears the contract total will increase by \$82,500 from \$100,400 to \$182,900 “in accordance with the contractor’s renewal quote” for the contract term of 1/27/2026 through 1/26/2027 (a contract term extension that was *already* granted without Finance & Personnel Committee approval in 2025). It is our understanding that the requirement for single or sole source service contracts to be approved by the Finance & Personnel committee under City Charter 16-05-4a will not be applied to this contract amendment on the grounds that the contract involves “services related to proprietary products.”

This is particularly concerning in light of the history of recent Flock contract approvals and amendments that bypassed Finance & Personnel Committee approval. The chart below summarizes these recent waivers of Finance & Personnel Committee approval for Flock contracts, and a copy of these waiver recaps are attached to this letter.

Date	Item	Term	Cost
07/09/2025	Original Contract: Vendor Services Contract for Flock License Plate Reader Cameras and Related Services F&P Committee Presentation Date: 07/09/2025	01/27/2025 through 01/26/2026	\$52,500.00
09/17/2025	Amendment #1: Extended the contract term from 01/27/2026 through 01/26/2027. Added six (6) license plate reader cameras and licenses to run conterminously with the original contract and in accordance with contractor’s quotes. Increased contract by \$36,900.00 from \$52,500.00 to \$89,400.00. F&P Committee Presentation Date: 09/17/2025	01/27/2026 through 01/26/2027	\$36,900.00
09/17/2025	Amendment #2: Added three (3) license plate reader cameras and licenses in accordance with the contractor’s quotes. Increased contract by \$11,000.00 from \$89,400.00 to \$100,400.00. F&P Committee Presentation Date: 09/17/2025	N/A	\$11,000.00
Pending	Amendment #3: Increase the contract by \$82,500.00 from \$100,400.00 to \$182,900.00. “These funds are for the renewal of licenses for MPD’s thirty-one (31) City-funded Flock cameras...” F&P Committee Presentation Date: 02/4/2026	N/A	\$82,500.00
Total (including the pending amendments)			\$182,900.00

What is Flock Safety?

Flock sells automated license plate readers (ALPRs) and database software to police departments, federal agencies, and private corporations across the country. These cameras collect data indicating who is driving, where, and when—for every car that passes, not merely cars associated with suspected criminal activity. Flock stores this information in a proprietary database.

Data Sharing Options

Law enforcement agencies that contract with Flock can choose from several data sharing settings, including:

- No sharing outside the department
- Sharing only with specific, named law enforcement agencies
- Sharing only with Wisconsin-based law enforcement agencies
- Sharing with all government customers nationwide

The Contract Language Problem

Even when departments select restrictive administrative settings, there's an additional concern. According to documents obtained by the ACLU through public records requests, Flock's standard contracts with police departments across the country include language giving the company “a nonexclusive, worldwide, perpetual, royalty-free right and license [to] disclose the Agency Data (both inclusive of any Footage) to enable law enforcement monitoring against law enforcement hotlists as well as provide Footage search access to law enforcement for investigative purposes only.”

This contract language may supersede MPD's selection of restrictive settings, meaning departments must amend their contracts with Flock to ensure their data is truly protected.

The Scope of the Problem

Public records recently 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 dozens of Wisconsin 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.

Flock's surveillance network spans at least 5,000 police departments, and the ACLU believes the real number is over 7,000. In Wisconsin, at least 221 Wisconsin law enforcement agencies use Flock including the Milwaukee, Wauwatosa and West Allis police departments as well as the Sheriff's Departments in Milwaukee, Ozaukee and Waukesha counties.¹ According to an analysis of Flock audit data detailing searches between January 1 – May 28, 2025, the **Milwaukee Police Department/STAC performed the most Flock searches of all Wisconsin law enforcement agencies during that time-period, with “[n]early 40,000 searches originating from MPD alone appear[ing] in network audit data from the Wauwatosa Police Department.”**²

¹ “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/>.

² Id.

Put simply: if the MPD or the Fusion Center are sharing data with Flock's national database, police from thousands of outside jurisdictions can track Milwaukee residents and those driving in the city for work and entertainment—including immigrants, people seeking healthcare, elected officials, and other targets of the federal government—as they drive through our communities.

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.³ 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.”

Examples Weaponization of Surveillance by the Federal Government

As the ACLU-WI has warned the Common Council previously⁴—**at this point in time, the proliferation and use of surveillance technology by the Milwaukee Police Department or any law enforcement agency should give everyone pause.**

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.⁵ 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.⁶

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.⁷ For example:

³ 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/>.

⁴ ACLU of Wisconsin Letter to Milwaukee Common Council Re: Surveillance (April 17, 2025), https://www.aclu-wi.org/app/uploads/2025/04/aclu-wi_open_letter_to_milwaukee_common_council_0.pdf; Coalition Letter to Milwaukee Common Council (May 21, 2025), <https://www.aclu-wi.org/app/uploads/2025/05/ccopscoalitionletter.pdf>.

⁵ “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>.

⁶ 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>.

⁷ 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>.

- In Gig Harbor, Washington,⁸ the police chief found himself being grilled by city council members over ICE data sharing. “You sent some information I think about the city of Puyallup and they said that I believe they belong to 593 networks,” asked one. “So ... if we share data with Puyallup what's to keep Puyallup from putting that data all over 593 networks?”
- In Syracuse, New York,⁹ 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 Evanston¹⁰ 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.
- Austin¹¹ officials decided not to renew the city’s contract with Flock. “Austin should not be participating in Trump’s mass surveillance programs,” declared Council Member Mike Siegel.
- In Richmond,¹² 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. Richmond then cut off the data sharing.
- In Verona, the Common Council recently voted not to renew their Flock Contract following an outpouring of public comments opposing the cameras and lack of transparency around how the cameras were being used.¹³

A Pattern of ALPR Misuse by Local Law Enforcement

In addition to the weaponization of ALPR surveillance by the federal government and other jurisdictions, an alarming trend has developed regarding misuse of Flock/ALPR technology by local law enforcement. To name a few examples:

- In January 2026, Menasha police officer Cristian Morales was charged with misconduct in office for allegedly using a license plate reader system to track his ex-girlfriend.¹⁴

⁸ Gig Harbor won’t install license plate-reading cameras, Gig Harbor Now (March 26, 2025), <https://www.gigharbornow.org/news/government/gig-harbor-wont-install-license-plate-reading-cameras/>.

⁹ “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/>.

¹⁰ “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>.

¹¹ “Austin’s automatic license plate reader program will end this month,” KUT News (June 4, 2025), <https://www.kut.org/austin/2025-06-04/austin-tx-automatic-license-reader-program-police-data-privacy-flock>.

¹² “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>.

¹³ “AI-powered police cameras face pushback from Wisconsin communities,” WPR (Dec. 19, 2025), <https://www.wpr.org/news/wisconsin-police-forces-use-cameras-track-vehicles-communities-worry-overreach>.

¹⁴ “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>.

- 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.¹⁵
- 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.¹⁶
- 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.¹⁷
- 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.¹⁸

At a June 18, 2025 meeting of the Milwaukee Equal Rights Commission meeting, MPD Chief of Staff Heather Hough conceded there have been cases of surveillance technology misuse within the department. She said, "'We have systems, for instance, to look up people's license plates that's monitored all the time. And we've had instances where we disciplined individuals because they've looked up a relative.'"¹⁹ While it's unclear if this refers to Flock or another license search platform used by MPD, the Common Council and the public deserve to know the full extent of the risks these technologies present.

Now more than ever, we urge the Finance & Personnel Committee to examine the application of procurement policies surrounding Flock and other surveillance technology contracts that bypass Committee approval—and democratic accountability—based on the purported “proprietary” nature of these products.

While local law enforcement agencies—including the Milwaukee Police Department—may have good intentions, history reminds us how quickly larger systems can override those intentions. Data collected in Milwaukee does not stay in Milwaukee. Once our data enters a federal pipeline or a database connected to surveillance tools in the private sector, it can be accessed, shared, and used in ways we cannot predict—or stop.

[recognition-system-to-track-his-ex-girlfriend-cristian-morales-misconduct-in-office-flock-domestic-abuse-restraining-order-cash-bond.](#)

¹⁵ “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-his-ex-girlfriend-228-times-arrests-charges-probation-flock-safety-follow-stalk-new-boyfriend-broke-up-out-of-town-misuse>.

¹⁶ “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>.

¹⁷ “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.

¹⁸ “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>.

¹⁹ Recording of the June 18, 2025 Milwaukee Equal Rights Commission Meeting at timestamp [1:10:30], https://milwaukee.granicus.com/player/clip/4739?view_id=2&redirect=true.

**Department of Administration
Purchasing Division**

**Waiver of Finance & Personnel Committee Approval
For Single Source Contract
Contract #E0000021123**

Background:

User Department:	Milwaukee Police Department
Purchasing Agent:	Michael Siler
Contract Description:	Vendor Service Contract for Flock License Plate Reader Cameras and Related Service
Vendor Name and Location:	Flock Group, Inc. dba Flock Safety (Atlanta, GA)
Contract Term:	01/27/2025 through 01/26/2026 with options to extend annually upon mutual agreement
Requisition # and Date Received:	0000021123 & 04/15/2025
Original Contract Amount:	\$52,500.00
Expenditures to Date:	\$0
Current Contract Amount:	\$52,500.00

Purpose of Contract:

It is recommended that the Milwaukee Police Department (MPD) be permitted to dispense with the competitive bid process and enter into a Vendor Service Contract for Flock License Plate Reader Cameras and Related Service with Flock Group, Inc. dba Flock Safety (Flock) for a contract term of 01/27/2025 through 01/26/2026 with options to extend annually upon mutual agreement, and a contract total of \$52,500.00.

Justification for Waiver:

Flock is the only purveyor of license plate reader cameras that also connect with Axon's proprietary software that catalogs and stores MPD body-camera footage, allowing photos and recordings to be stored and accessed in a single system.

Currently, MPD has thirty-one (31) cameras in use. Ten (10) cameras are licensed and paid for through December 2025 via the most recent amendment to Contract E18484. In 2021 MPD was able to secure the license and use of twenty-one (21) cameras through a grant from Axon, allowing for their use without cost. That grant expired at the end of 2024, requiring a contract with an Order Form and Master Service Agreement (MSA). Contract E21123 will place those twenty-one (21) cameras on a City of Milwaukee contract, exhibiting the MSA and the Order Form, in order to pay for their use in 2025 and all future renewals. Additionally, there is already a requisition (21264) created to amend contract E21123 to add six (6) cameras to Business Improvement Districts (BID). Specifically, three (3) cameras will be leased to BID #6 and three (3) cameras will be leased to BID #32.

For this reason and in accordance with City Charter 16-05-4a, Finance and Personnel Committee approval is waived for services authorized by the Common Council.

DocuSigned by:

Rhonda U. Kelsey

City Purchasing Director
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6/16/2025

Date

F&P Waiver Presentation Date: 07/09/2025

**Department of Administration
Purchasing Division**

**Waiver of Finance & Personnel Committee Approval
For Single Source Contract
Contract #E0000021123**

Background:

User Department:	Milwaukee Police Department
Purchasing Agent:	Michael Siler
Contract Description:	Vendor Service Contract for Flock License Plate Reader Cameras and Related Services
Vendor Name and Location:	Flock Group, Inc. dba Flock Safety (Atlanta, GA)
Contract Term:	From 01/27/2025 through 01/26/2026 with options to extend annually upon mutual agreement
Requisition # and Date Received:	0000021303 & 07/03/2025
Original Contract Amount:	\$52,500.00
Expenditures to Date:	\$61,950.00
Current Contract Amount:	\$100,400.00

History of Contract Amendments:

Date	Item	Term	Cost
07/09/2025	Original Contract: Vendor Service Contract for Flock License Plate Reader Cameras and Related Services F&P Committee Presentation Date: 07/09/2025	01/27/2025 through 01/26/2026	\$52,500.00
Pending	Amendment #1: Extended the contract term from 01/27/2026 through 01/26/2027. Add six (6) license plate reader cameras and licenses to run conterminously with the original contract and in accordance with the contractor's quotes. Increase the contract by \$36,900.00 from \$52,500.00 to \$89,400.00. F&P Committee Presentation Date: 09/17/2025	01/27/2026 through 01/26/2027	\$36,900.00
Pending	Amendment #2: Add three (3) license plate reader cameras and licenses in accordance with the contractor's quotes. Increase the contract by \$11,000.00 from \$89,400.00 to \$100,400.00.	N/A	\$11,000.00
Total (including the pending amendments)			\$100,400.00

Purpose of Amendment:

The purposes of these amendments is for the Milwaukee Police Department (MPD) to amend its Vendor Service Contract with Flock Group, Inc. dba Flock Safety (Flock) for License Plate Reader Cameras and Related Services by one (1): extending the contract term from 01/27/2026 through 01/26/2027, and adding six (6) additional license plate reader cameras licenses to run conterminously with the original contract and in accordance with the contractor's quotes, and two (2): adding three (3) additional license plate reader cameras and licenses in accordance with the contractor's order form.

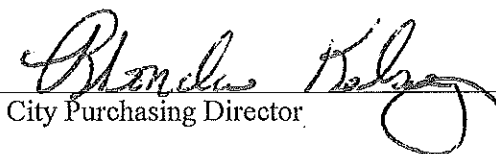
Amendments one (1) and two (2) increase the contract total by \$36,900.00 from \$52,500.00 to \$89,400.00 and \$11,00.00 from \$89,400.00 to \$100,400.00 respectively.

Justification for Waiver:

Business Improvement Districts (BID) thirty-two (32) and forty-one (41) added three (3) cameras in each district in August 2025 for a total of six (6) in Amendment one (1). After the execution of Amendment one (1), BID forty-three (43) requested three (3) additional cameras to be utilized by MPD. While the nine (9) cameras are added to MPD Contract E0000021123, the cameras will be paid for with funds collected from the BID.

Flock cameras are the only license plate reader cameras that also connect with Axon's proprietary software that catalogs and stores MPD body-camera footage, allowing photos and recordings to be stored and accessed in a single system.

For this reason and in accordance with City Charter 16-05-4a, Finance and Personnel Committee approval is waived for services authorized by the Common Council.



City Purchasing Director

9.17.2025
Date

F&P Waiver Presentation Date: 09/17/2025

**Department of Administration
Purchasing Division**

**Waiver of Finance & Personnel Committee Approval
For Single Source Contract
Contract #E0000021123**

Background:

User Department:	Milwaukee Police Department
Purchasing Agent:	Michael Siler
Contract Description:	Vendor Service Contract for Flock License Plate Reader Cameras and Related Services
Vendor Name and Location:	Flock Group, Inc. dba Flock Safety (Atlanta, GA)
Contract Term:	From 01/27/2025 through 01/26/2026 with options to extend annually upon mutual agreement
Requisition # and Date Received:	Req 0000021583 & rec'd 11/24/2025
Original Contract Amount:	\$52,500.00
Expenditures to Date:	\$61,950.00
Current Contract Amount:	\$100,400.00

History of Contract Amendments:

Date	Item	Term	Cost
07/09/2025	Original Contract: Vendor Service Contract for Flock License Plate Reader Cameras and Related Services F&P Committee Presentation Date: 07/09/2025	01/27/2025 through 01/26/2026	\$52,500.00
09/17/2025	Amendment #1: Extended the contract term from 01/27/2026 through 01/26/2027. Added six (6) license plate reader cameras and licenses to run conterminously with the original contract and in accordance with the contractor's quotes. Increased the contract by \$36,900.00 from \$52,500.00 to \$89,400.00. F&P Committee Presentation Date: 09/17/2025	01/27/2026 through 01/26/2027	\$36,900.00
09/17/2025	Amendment #2: Added three (3) license plate reader cameras and licenses in accordance with the contractor's quotes. Increased the contract by \$11,000.00 from \$89,400.00 to \$100,400.00. F&P Committee Presentation Date: 09/17/2025	N/A	\$11,000.00
Pending	Amendment #3: Increase the contract total by \$82,500.00 from \$100,400.00 to \$182,900.00.	N/A	\$82,500.00
Total (including the pending amendments)			\$182,900.00

Purpose of Amendment:

The purpose of this amendment is for the Milwaukee Police Department (MPD) to amend its Vendor Service Contract with Flock Group, Inc. dba Flock Safety (Flock) for License Plate Reader Cameras and Related Services by increasing the contract total by \$82,500.00. from \$100,400.00 to \$182,900.00, in accordance with the contractor's renewal quote.

Justification for Waiver:

These funds are for the renewal of licenses for MPD's thirty-one (31) City-funded Flock cameras for the period of 01/27/2026 through 01/26/2027.

Flock cameras are the only license plate reader cameras that also connect with Axon's proprietary software that catalogs and stores MPD body-camera footage, allowing photos and recordings to be stored and accessed in a single system.

For this reason and in accordance with City Charter 16-05-4a, Finance and Personnel Committee approval is waived for services authorized by the Common Council.

DocuSigned by:

Rhonda U. Kelsey

City Purchasing Director
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12/9/2025

Date

F&P Waiver Presentation Date: 02/04/2026